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State of Iowa 2025-2029 Fair Housing Plan

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Executive Summary

Purpose of Fair Housing Planning

Iowa last completed a Fair Housing Plan (or Analysis of Impediments to Fair Housing Choice) in 2018. The purpose of this update is to better understand the challenges faced by specific groups of people who tend to experience greater housing challenges based on their specific characteristics and needs. Federal and state governments put legal protections in place to ensure no person faces housing discrimination based on characteristics associated with a particular group. The groups covered by these laws are called protected classes.

The protected classes in Iowa are color, creed, marital status, mental disability, national origin, physical disability, race, religion, retaliation, sex, and sexual orientation. There is a limited allowance for discrimination in the following areas:

- **Age:** A person is protected from employment and credit discrimination.
- **Family Status:** A person is protected from housing and credit discrimination.
- **Marital Status:** A person is protected only from credit discrimination.
- **Mental disability:** A person is protected from all discrimination except credit discrimination.

Every person belongs to a protected class because every person has a race, age, national origin, etc. However, certain groups within each protected class, such as people who are members of racial or ethnic minorities, seniors, or families with children, often face additional barriers to securing housing that meets their needs.

Throughout the fair housing planning process, Iowa analyzed census data, state policies, and community feedback. The Assessment of Fair Housing (AFH) serves as the summary of these efforts. The AFH includes a description of fair housing laws, community needs and trends, access to opportunity, local policies, and fair housing complaints.

The fair housing planning process uncovered certain barriers, or impediments, to fair housing in Iowa. The AFH describes these impediments and actions Iowa will take to overcome them.

Key Findings

Iowa analyzed various topics, including demographics, income, housing, transportation, local policies, and fair housing complaints, through the lens of certain groups. Note that Iowa analyzed the most recent datasets available at the time of drafting the AFH.

Community Needs and Trends

- **Demographics:** Many Iowa residents belong to groups that may face additional housing challenges, such as people identifying as racial or ethnic minorities, people living with a disability, and households with children. In 2022, 17.6 percent of residents were over the age of 65, 13.1 percent identified as a race other than White, and 12.2 percent lived with a disability. In addition, 26.9 percent of households included at least one child.
- **Median Income and Poverty:** Households with at least one member belonging to the following groups earned less on average than Iowa's median income: Black, Hispanic, senior, and female and male householders.

- **Housing Cost Burden:** Elderly households were particularly vulnerable to experiencing severe housing cost burden (meaning they paid more than 50 percent of their income on housing expenses). In 2020, elderly households represented about half of the severely cost-burdened owners across each income category.
- **Homeownership Rates:** From 2018 to 2022, homeownership rates varied, with White households having the highest homeownership rate (74.5%) to Black or African American households at 28%.
- **People Experiencing Homelessness:** In 2021, people with disabilities were overrepresented among people experiencing homelessness. While 12 percent of the population lived with a disability, 54 percent of people experiencing homelessness lived with a disability.
- **Education Rates:** In 2022, Black or African American, Asian and Hispanic residents were less likely than White residents to obtain a high school diploma, while Black and Hispanic residents were less likely than White residents to obtain a bachelor's degree. 94.5 percent of White residents obtained a high school diploma, compared to 84.5 percent of Black or African American residents, 80 percent of Asian residents and 67.5 percent of Hispanic residents. Additionally, 30.7 percent of White residents obtained a Bachelor's degree, compared to 18.2 percent of Black residents and 15.6 percent of Hispanic residents. Asian residents had the highest percent of residents receiving a Bachelor's degree at 47.3 percent.

Policy Review

- **Assisted Housing Units:** In terms of affordability restrictions, there are 5,302 assisted units (13 percent) with restrictions that are set to expire between 2024 and 2028 if no action is taken to preserve affordability. Assuming nothing is done to preserve affordability, Iowa would lose about a quarter of its assisted housing over the next ten years. The period with the greatest estimated affordability expirations is 2039 to 2043 during which the state could lose 9,557 (23 percent) of its assisted housing units.
- **Housing Lending Outcomes:** An analysis of housing lending outcomes indicates that certain groups, including members of racial and ethnic minorities, women, and seniors, were less likely to apply for housing financing than others. The data indicates that most applicants are White (68 percent), with less than 5 percent of applicants identifying as a race other than White. Additionally, 23 percent of applicants identified as Hispanic or Latino, and 29 percent of applicants identified as male while 18 percent identified as female.
- **Loan Denial Reasons:** Debt-to-income ratio, lack of collateral, and credit history were the most common reasons non-White residents were denied loans.

Evidence of Housing Discrimination

- **Number of Complaints:** From 2009 to 2019, 2,409 complaints were filed. 1,245 (52 percent) were for discrimination on the basis of disability. The second most common basis for complaints was sex, which accounted for 11 percent of complaints.
- **Basis of Complaints:** Federally and statewide, a person's disability was the most common basis of the alleged housing discrimination.
- **Insight from Fair Housing Organizations:** During consultation sessions, fair housing organizations emphasized that fair housing training, testing, and outreach to service

organizations, developers, and residents can help to promote fair housing knowledge and help prevent incidences of discrimination.

Identified Impediments to Fair Housing

Iowa identified three impediments to fair housing.

- There is a low supply of affordable housing.
- Affordable housing options often lack accessibility features for people with physical disabilities and seniors.
- Community members have limited knowledge of their fair housing rights and landlord responsibilities.

Iowa identified various actions it will take over the next five years to overcome the identified impediments to fair housing.

Increasing Affordable Housing Supply

- Iowa will continue to partner with housing organizations to explore building more affordable housing.

Increasing Accessible Housing Supply

- Iowa will create and preserve affordable homeownership housing by assisting eligible homeowners to rehabilitate their homes to address accessibility needs and requisite structural and other repairs.

Promoting Knowledge of Fair Housing

- Iowa will organize and host a fair housing training for organizations working with residents.

Increasing Language Access

- Iowa will continue to work on translating key documents, such as program applications, into other languages.
- Iowa will work with non-profit agencies to understand the barriers and services needed for non-English-speaking residents.

Introduction

Assessments of Fair Housing (AFHs) provide valuable insight into the needs of a cross-section of Iowa residents. They include an assessment of available data, policies, and insights from community partners and residents across the state. This section provides an overview of the fair housing planning process and how it can be used in Iowa. This section also describes the fair housing planning process completed by Iowa and summarizes actions taken to address previously identified fair housing issues.

Overview

Iowa conducts a fair housing planning process every five years and creates a corresponding report. The purpose of this process is to better understand the challenges faced by specific groups of people who tend to experience greater housing challenges based on their specific characteristics and needs. Federal and state governments put legal protections in place to ensure that no person faces housing discrimination based on characteristics associated with a particular group. The groups covered by these laws are called protected classes. Under federal law, there are seven protected classes, which are listed below.

- Race
- Religion
- Color
- Sex
- National origin
- Familial status
- Disability

The protected classes in Iowa are color, creed, marital status, mental disability, national origin, physical disability, race, religion, retaliation, sex, and sexual orientation. There is a limited allowance for discrimination in the following areas:

- Age: A person is protected from employment and credit discrimination.
- Family Status: A person is protected from housing and credit discrimination.
- Marital Status: A person is protected only from credit discrimination.
- Mental disability: A person is protected from all discrimination except credit discrimination.

Every person belongs to a protected class because every person has a race, age, national origin, etc. However, certain groups within each protected class, such as people who are members of racial or ethnic minorities, seniors, foreign-born residents, or families with children often face additional barriers to securing housing that meets their needs.

The fair housing planning process allows communities to analyze fair housing issues among certain groups, such as housing affordability and availability, homelessness, and access to jobs and services. All of these factors may limit the range of housing choices available or impede a person's access to housing. The fair housing planning process is a useful tool for jurisdictions to collect recent data on fair housing issues to inform programs, provide information to members of the public, and reaffirm working relations with partners.

The fair housing planning process also allows communities to examine their progress toward their goals of eliminating housing discrimination and providing current and future residents with access to equal housing opportunities. In addition, the process allows communities to explore additional actions that are being taken or could be taken to further increase housing choice and create a plan for action over the next five years.

Through the planning process, Iowa identified three barriers to fair housing. Iowa has developed action steps to be taken over the next five years to remove those barriers and promote fair housing.

Through the fair housing planning process and implementation of identified actions in the AFH, Iowa is affirmatively furthering fair housing as required by the Fair Housing Act as a recipient of federal funding through HUD.

Community Participation Process

The AFH was developed using a variety of information sources. Iowa used these sources to develop key themes regarding housing needs for certain populations. Community and stakeholder input served as an important source of information. This section describes the efforts to engage community members to inform the development of the plan.

Community and Stakeholder Engagement Process

The fair housing planning process sought to ensure members of diverse groups of people and organizations that serve them had the opportunity to comment on housing needs. Iowa asked for input from community members and service providers in the fall of 2024. Their feedback was used in the development of Iowa's 2025–2029 Consolidated Plan and the AFH.

Community engagement activities took place from September to October 2024. These activities reached 15 unique stakeholder organizations and 88 community members through multiple engagement strategies. See Table 1A in the appendix for the full list of organizations consulted.

Iowa conducted a survey for stakeholder organizations as well as a survey for community members. Both surveys were conducted through a robust online process and distributed through various channels, including e-blasts, to encourage participation. The surveys asked respondents questions regarding community needs on the following topic areas:

- Affordable housing
- Housing and supportive services
- Public facilities and infrastructure
- Human services
- Fair housing

Stakeholder Survey Responses – Fair Housing

Agency Capacity Regarding Fair Housing

Overall, organizations responding to the survey indicated a high level of understanding regarding the steps to request reasonable accommodations and file a fair housing complaint. Most respondent organizations (65 percent) indicated that their organization has received fair housing training in the last three years. Organizations indicated that the best way to increase

fair housing is to increase both the number of affordable units and fair housing education within the community.

- **Fair Housing Training (n=136)**
 - 65 percent of organizations have participated in fair housing training in the last three years.
 - 11 percent of organizations have not participated in fair housing training in the last three years.
- **Knowledge of Fair Housing Protections (n=136)**
 - 53 percent of organizations indicated that they were “very well informed” regarding Fair Housing Act protections.
 - 32 percent of organizations indicated that they were “somewhat informed” regarding Fair Housing Act protections.
 - 13 percent of organizations indicated that they were “a little informed” regarding Fair Housing Act protections.
 - 3 percent of organizations indicated that they were “not at all informed” regarding Fair Housing Act protections.
- **Requesting reasonable accommodations (n=134)**
 - 73 percent of organizations indicated that they know how to request a reasonable accommodation for housing.
 - 27 percent of organizations indicated that they do not know how to request a reasonable accommodation for housing.
- **Filing a Fair Housing Complaint (n=135)**
 - 71 percent of organizations indicated that they know how to file a fair housing complaint.
 - 29 percent of organizations indicated that they do not know how to file a fair housing complaint.
- **Strategies Currently Used to Educate the Community on Fair Housing (top five answers) (n=129)**
 - Posting physical copies of materials (57 percent selected).
 - Providing information at time of housing transaction (55 percent selected).
 - Publishing information on the organization’s website (30 percent selected).
 - My organization does not conduct outreach on fair housing (22 percent selected)
 - Broadcasting messages to the public (12 percent selected)
- **Fair Housing Activities Organizations would like to See More Of (top five answers) (n=130)**
 - Increases in the number of two- and three- bedroom affordable housing units for families with children (70 percent selected).
 - Fair housing education and resources for the public (60 percent selected).
 - Help for people with disabilities to access reasonable accommodations (changes to the rules or policies to allow people with disabilities to live or stay in housing, including service and support animals) (52 percent selected).
 - Fair housing training for program staff or specific groups such as tenants or landlords (50 percent selected).
 - Coordinated Reentry services (49 percent selected).

Observed Discrimination/Fair Housing Issues

Stakeholders indicate the criminal history serves as the most observed discriminated class, as well as a barrier to renting housing. Stakeholders emphasize cost as the primary barrier to renting housing. Of note, 75 percent of survey respondents agreed or strongly agreed with the statement that infrastructure contributes to segregation in the community.

- **Protected Classes Facing Discrimination (top five answer choices) (n=133)**
 - Criminal History (77 percent selected)
 - Source of Income (74 percent selected)
 - Race/Ethnicity (59 percent selected)
 - Disability (53 percent selected)
 - Sexual Orientation (41 percent selected)
- **Challenges Faced Renting Housing (top five answer choices) (n=133)**
 - Cost of Rent (90 percent selected)
 - Cost of a Deposit (81 percent selected)
 - Access to Housing because of Criminal History (77 percent selected)
 - Credit and Background Screening (68 percent selected)
 - Access to Accessible Housing (54 percent selected)
- **Infrastructure contributes to segregation in the community (n=135)**
 - Strongly Agree (39 percent selected)
 - Agree (36 percent selected)
 - Neither Agree nor Disagree (18 percent selected)
 - Disagree (7 percent selected)
 - Strongly Disagree (0 percent selected)

Assessment of Residents Knowledge of Fair Housing

In contrast to the fair housing knowledge demonstrated in the stakeholder's assessment of their own organizations, stakeholders believed that residents are not aware/would not report a fair housing violation. This indicates a need for more awareness and outreach to the community.

- **Residents are generally aware of how to report a fair housing violation (n=135)**
 - Disagree (32 percent selected)
 - Neither Agree nor Disagree (27 percent selected)
 - Agree (24 percent selected)
 - Strongly Agree (11 percent selected)
 - Strongly Disagree (5 percent selected)
- **Residents are likely to report a fair housing violation (n=134)**
 - Disagree (31 percent selected)
 - Neither Agree nor Disagree (28 percent selected)
 - Agree (24 percent selected)
 - Strongly Disagree (10 percent selected)
 - Strongly Agree (7 percent selected)

Key Themes from the Community Engagement Process

Several key fair housing themes emerged through consultation sessions. Table 1 identifies each theme and how they might affect different protected classes.

Table 1—Key Themes from the Community Engagement Process

Theme	Connection with Fair Housing	Impacted Protected Classes
Iowa’s high housing costs and lack of supply, evident through the CHAS estimates. According to CHAS data, 15.3 percent of households are cost-burdened and 11.6 percent of households are severely cost-burdened.	Housing issues affect all members of the population. Protected classes can be more likely to experience housing problems due to increased social and economic vulnerability.	All
Many available units are not accessible to persons with disabilities and/or do not meet Section 8 inspection criteria, further limiting housing options.	People with disabilities and some seniors have limited mobility and need specific design elements incorporated into a housing unit to provide more housing choice.	People with Disabilities
There is a need to continue the removal of barriers in streets, such as through curb and ramp improvements, and add sidewalks to increase accessibility.	People with disabilities are more likely to have mobility challenges, which makes using streets and sidewalks with barriers, such as curbs, difficult.	People with Disabilities
There is a need to increase fair housing knowledge. Over 29 percent of surveyed organizations didn’t know how to file a fair housing complaint.	Fair housing reporting and reasonable accommodation requests are important aspects of fair housing. Knowing their rights, responsibilities, and options under the Fair Housing Act equips residents with the knowledge to advocate for their needs	All

Data Source: Community and Stakeholder Consultations and Survey (2024).

Progress Since Previous Fair Housing Plan

Assessing past progress on fair housing goals lays the groundwork for understanding the current fair housing landscape in Iowa. This allows Iowa to understand the impact of previous actions to inform the development of future goals and actions.

In the previous AFH prepared in 2018, Iowa outlined six impediments that acted as barriers to certain populations finding and maintaining fair housing. From 2020 to 2025, Iowa has taken

multiple steps to help overcome those barriers. The table below lists the six impediments, their descriptions, and the actions taken over this time period.

Table 2—Progress Since the Previous Fair Housing Plan

Impediment	Recommended Actions to be Taken	Actions Taken
Segregation	Promote the development of affordable housing units in high opportunity areas	Iowa has outperformed its affordable housing goals for the past three years. Generally, differences between goals and accomplishments may be due to fluctuations from one year to the next in activity completions. With respect to the Homeless population, the increase in actual households supported may be due to the state receiving and granting out additional ESG-CV funds. In February of 2023 the state received \$627,305 in reallocations and made 11 awards as a result
Disparities in Access to Opportunity	Promote the development of affordable housing units in low poverty areas and areas with proficient school Continue to work with the Olmstead Task Force to reduce barrier to affordable housing for persons with disabilities	In 2024, IFA awarded approximately \$13.3 million dollars of available HOME-ARP funds aimed at developing additional housing units and providing needed supportive service activities to qualifying populations including vulnerable Iowans at the lowest rung of the housing continuum.
Disproportionate Housing Needs	Continue to preserve affordable housing options through owner-occupied and rental rehabilitation and expand affordable housing options throughout the State. Review programs on an annual basis	Iowa has placed tremendous resources into the development of affordable housing. Consequently, almost twice as many rental units have been constructed using HUD funds since 2020 than were originally contemplated. Moreover, the state has leveraged additional federal funds to develop both a \$20 million program for owner occupied new home construction, rehabilitation, adaptive re-use, and down payment assistance; as well as a \$4 million Home Rehabilitation Block Grant program that offers rural Iowa communities an opportunity help preserving their homes, respectively
Publicly supported housing	Continue to require projects under LIHTC, HOME, and NHTF to establish Affirmative Fair Marketing Plans (AFHMP) that reduce barriers to housing	Iowa Economic Development Authority (IEDA) and Iowa Finance Authority (IFA) have several policies to promote and demonstrate their commitment to Fair Housing in the State. These are conveyed through workshops, contractual language, management guide instructions and technical assistance. IEDA's CDBG Management Guide, which is distributed to program recipients and is available on the IEDA

Impediment	Recommended Actions to be Taken	Actions Taken
		<p>website, contains sections on fair housing and affirmative marketing. The sections provide guidance for achieving goals. IFA provides a HOME Program Guide to Rental, Homebuyer, and TBRA recipients which provides guidance on civil rights and fair housing. HOME recipients and developers must submit an Affirmative Fair Housing Marketing Plan, so IFA developed an Outreach Guide to assist them in completing their AFHM Plans.</p>
Disability and Access	<p>Continue to work with the Olmstead Task Force to reduce barrier to affordable housing for persons with disabilities. Explore the option of creating a program to provide home loan opportunities targeted to people with disabilities. Encourage a percentage of new LIHTC and HOME units are accessible in areas with higher access to needed services. Continue use of LIHTC's Qualified Action Plan (QAP) Olmstead Goals</p>	<p>IFA has worked with the Olmstead Task Force to reduce barriers to affordable housing for those with disabilities and continued to identify education and outreach efforts. HOME recipients are required to target persons with disabilities regardless of percentages found in the housing market area and were asked to provide Affirmative Fair Housing Marketing Plans that were complete and demonstrated the opportunity for effective implementation to meet Affirmative Fair Housing Marketing goals. Recipients were encouraged to document extra effort taken to directly market to underserved populations so they could effectively evaluate their outreach efforts.</p>
Fair Housing Enforcement and Outreach	<p>Continue to work with Iowa Civil Rights Commission (ICRC) to provide trainings, CDBG grantee requirements on an annual basis. Promote outreach and education related to credit for prospective homebuyers. Include enhanced financial literacy for senior high school students</p>	<p>Iowa Economic Development Authority (IEDA) and Iowa Finance Authority (IFA) have several policies to promote and demonstrate their commitment to Fair Housing in the State. The Iowa Civil Rights Commission contracted with Family Housing Advisory Services, Inc. (hereafter FHAS) to conduct testing in Iowa. The Commission and FHAS worked together to identify communities in need of this work. The Fair Housing Center of NE-IA (hereafter FHC) is a subsidiary of FHAS. FHC carried out the testing. In the first phase of the project, FHC conducted matched pair fair housing telephone test. Of these tests, many were related to real estate transactions and sales and rental transactions. These tests were conducted to determine if race and nation origin were being used to exclude those from renting or purchasing.</p>

Fair Housing Laws

Overview

Fair housing laws outline certain practices communities must follow to prevent and address housing discrimination. Understanding federal and state laws allows community members and service providers to ensure the housing rights of residents are being protected. This section describes the federal and state laws that pertain to fair housing.

Federal Housing Laws

All states and municipalities in the United States are subject to the Fair Housing Act, administered and enforced by HUD, and other federal housing laws such as the Housing for Older Persons Act of 1995 (HOPA) and the Fair Housing Amendments Act of 1988 (FHAA).

Fair Housing Act

In 1968, Congress passed the Civil Rights Act after years of advocacy in the United States against overt discrimination and segregation in the sale and rent of housing based on a person's race, national origin, skin color, gender, and religion. In 1988, Congress added additional protections against housing discrimination for people based on their familial status (e.g., women who are pregnant or the presence of children under 18) and disability.

The Fair Housing Act applies to almost any person or group involved with housing in the United States, including landlords, realtors, homeowners' associations, mortgage lenders, and homeowner's insurance companies. Under the Fair Housing Act, it is illegal to discriminate on the basis of race, religion, color, sex, national origin, familial status, or disability. The following are examples of actions that are violations of the Fair Housing Act when made on the basis of a protected class:

- Refusing to rent or sell housing.
- Refusing to negotiate for housing.
- Otherwise making housing unavailable.
- Setting different terms, conditions, or privileges for the sale or rental of a dwelling.
- Providing a person with different housing services or facilities.
- Falsely denying that housing is available for inspection, sale, or rental.
- Making, printing, or publishing any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination.
- Imposing different sales prices or rental charges for the sale or rental of a dwelling.
- Using different qualification criteria (such as different procedures, documents, or information) for rental standards, applications, income standards, application requirements, application fees, credit analyses, sale approval, or rental approval.
- Evicting a tenant or a tenant's guest.
- Harassing a person.
- Failing or delaying performance on maintenance or repairs.
- Limiting privileges, services, or facilities of a dwelling.
- Discouraging the purchase or rental of a dwelling.

- Assigning a person to a particular building, neighborhood, or section of a building or neighborhood.
- For profit, persuading or trying to persuade homeowners to sell their homes by suggesting that people of a particular protected characteristic are about to move into the neighborhood (referred to as “blockbusting”).
- Refusing to provide or discriminating in the terms or conditions of homeowner’s insurance because of the race, color, religion, sex, disability, familial status, or national origin of the owner or occupants of a dwelling.
- Denying access to or membership in any multiple listing service or real estate brokers’ organization.
- Refusing to make a mortgage loan or provide other financial assistance for a dwelling.
- Refusing to provide information regarding loans.
- Imposing different terms or conditions on a loan, such as different interest rates, points, or fees.
- Discriminating in appraising a dwelling.
- Conditioning the availability of a loan on a person’s response to harassment.
- Refusing to purchase a loan.

Under the Fair Housing Act, it is also illegal to threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise the right or retaliate against a person who has filed a fair housing complaint or assisted in a fair housing investigation.

Certain types of housing are exempt from federal fair housing laws, such as owner-occupied buildings with four or fewer units, single-family homes sold or rented by the owner without an agent, and housing operated by religious organizations or private clubs that are limited to members.

Some examples of housing practices that violate the Fair Housing Act include the following:

- The manager of an apartment complex restricts families with children to only one section of the building.
- An apartment manager will not show a unit on an upper floor to a senior or person with a disability.
- A realtor lies about a home having a pending offer when showing it to a couple who do not speak English proficiently.
- An apartment manager runs a credit check on applicants under 30 years old but not on older applicants.

Housing for Seniors

The 1995 HOPA creates an exception to Title VIII of the Fair Housing Act to allow for housing developments for seniors (referred to as “older persons” in the law). HOPA offers exceptions to discrimination based on family status for housing specifically designed for elderly individuals. To qualify for this exception, the housing must meet certain criteria and comply with all HOPA exemption requirements. The housing may be provided under a state or federal program designed to assist elderly persons or intended for and solely occupied by those at least 62 years old. Alternatively, the housing may be intended and operated for occupancy by those who are at

least 55 years old, with at least 80 percent of the units having at least one occupant verified to be 55 years of age or older.

All other Fair Housing Act protections apply to housing for seniors, including the prohibition of discrimination on the basis of race, color, religion, sex, disability, or national origin.

Fair Housing Amendments Act

The FHAA, signed in 1988, amended the Fair Housing Act to include persons with disabilities as a protected class and added additional regulations for policy accommodations and building modifications.

Under the FHAA, a person with a disability includes individuals with a physical or mental impairment that substantially limits one or more major life activities; individuals who are regarded as having such an impairment; and individuals with a record of such an impairment. “Major life activities” include walking, seeing, caring for oneself, hearing, speaking, breathing, learning, and working. Disabilities may also include mental or emotional illness, difficulties associated with aging, HIV/AIDS, and recovering from alcohol or drug addiction (completing a treatment program).

If a person requires the use of a walker, a wheelchair, a personal-care attendant, or a service animal to live in and enjoy housing in a way that is equivalent to a person without a disability, they are protected from housing discrimination.

An **accommodation** is a change in any rule, policy, procedure, or service needed for a person with a disability to have equal access to and enjoyment of their home. For example, allowing a service animal despite a “no pets” policy or allowing a tenant to mail in a rent check when others must physically deliver checks to a drop box.

A **modification** is a structural change made to the existing premises occupied or to be occupied by a person with a disability to afford such persons full enjoyment of the premises. A ramp installed into the front entrance of a house where there are only stairs, changing doorknobs to levers for someone with a mobility disability, or allowing a tenant with a sight impairment to install visual doorbells are all examples of reasonable modifications.

Like other housing discrimination laws, protections for people with disabilities apply to rental and owner-occupied housing, government zoning and other land-use planning, and homeowners’ associations.

Other Federal Laws and Regulations Impacting Fair Housing

In addition to the laws described in this section, there are additional federal laws, executive orders, and regulations that impact fair housing and provide protection against discrimination. Table 2A in the appendix lists notable fair housing laws and regulations and provides a brief description of their protections.

State Housing Laws

Iowa Civil Rights Act

Iowa’s Civil Rights Act protects residents against discrimination in housing by underscoring the protections outlined under federal law and, in certain instances, expanding groups covered by

these laws called protected classes. Under federal law, there are seven protected classes, which are listed below.

- Race
- Religion
- Color
- Sex
- National origin
- Familial status
- Disability

The protected classes in Iowa are color, creed, marital status, mental disability, national origin, physical disability, race, religion, retaliation, sex, and sexual orientation. There is a limited allowance for discrimination in the following areas:

- Age: A person is protected from employment and credit discrimination.
- Family Status: A person is protected from housing and credit discrimination.
- Marital Status: A person is protected only from credit discrimination.
- Mental disability: A person is protected from all discrimination except credit discrimination.

Interaction of Federal and State Law

Residents can report alleged instances of housing discrimination to both the HUD Office of Fair Housing and Equal Opportunity (FHEO) and the Iowa Office of Civil Rights (now part of the Iowa Department of Inspections, Appeals, and Licensing (DIAL)). IOCR has a cooperative agreement with HUD, which allows the agency to process and investigate dual-filed housing complaints for which the commission receives findings under the Fair Housing Assistance Program. Any Iowa resident who believes to have been discriminated against in housing based on a protected class can file a complaint with IOCR by completing a DocuSign form online or downloading and completing a complaint form and mailing, faxing, or emailing it to the commission. A complaint must be filed with the IOCR within 300 days of the last alleged discriminatory incident.

Summary of Fair Housing Protections

Table 3 provides a summary of the protected classes in Iowa as described in both federal and state laws.

Table 3—Summary of Protected Classes in Iowa

The following table shows the protected classes under chapter 216 of the Iowa Code:

Protected Classes	Areas of Protection				
	Employment	Housing	Public Accommodation	Education	Credit
Age	Yes	No	No	No	Yes

Color	Yes	Yes	Yes	Yes	Yes
Creed	Yes	Yes	Yes	Yes	Yes
Familial Status	No	Yes	No	No	Yes
Marital Status	No	No	No	No	Yes
Mental Disability	Yes	Yes	Yes	Yes	No
National Origin	Yes	Yes	Yes	Yes	Yes
Physical Disability	Yes	Yes	Yes	Yes	Yes
Race	Yes	Yes	Yes	Yes	Yes
Religion	Yes	Yes	Yes	Yes	Yes
Retaliation	Yes	Yes	Yes	Yes	Yes
Sex	Yes	Yes	Yes	Yes	Yes
Sexual Orientation	Yes	Yes	Yes	Yes	Yes

Iowa Mandatory and Elective Actions to Affirmatively Further Fair Housing

All units of local government applying for and receiving Community Development Block Grant (CDBG) funds from the State must document how they are meeting their fair housing obligations to ensure that grantees are fulfilling their requirements to affirmatively further fair housing.

A unit of local government can participate in the State’s CDBG Program by agreeing to implement all mandatory actions and at least one elective activity appropriate to the conditions and needs in its area. The selected elective activities are of the local government’s choice chosen from the list below. All grantees receiving CDBG funds through the State must complete the mandatory strategies and at least one elective strategy regardless of whether they are using CDBG funds for housing activities. The implementation of the mandatory strategies must be carried out each year for which the jurisdiction has received HUD funds through IEDA. This may be achieved through the posting of information in a conspicuous public place and/or publication in a local newspaper of general circulation.

Mandatory activities to promote Fair Housing include the following:

1. Advertise, publicize and pass an affirmative fair housing policy that will certify that the local government adheres to the requirements of the federal Fair Housing Act and the Iowa Civil Rights Act of 1965 (adoption and use of the Equal Housing Opportunity logo and the Equal Housing Opportunity statement), and

2. Identify and publish the name and contact information of a Discrimination Complaint Officer within the agency or jurisdiction for any housing-related bias or discrimination complaint, and
3. Refer housing discrimination complaints and assist in filing complaints with the Iowa Civil Rights Commission (based within the Iowa Office of Civil Rights), the U.S. Department of Housing & Urban Development, or a local civil rights commission.

In addition, there are **elective activities** to promote Fair Housing which include the following:

1. Advertise the availability of housing and related assistance to population groups that are least likely to apply through various forms of media (i.e. radio stations, posters, flyers, newspapers, Facebook, city web page) in English and other languages spoken by eligible families within the project service area
2. Include a flyer about fair housing in a local utility or tax bill and send it to every household in the municipality
3. Have the Responsible Entity staff attend a fair housing training or conference
4. Organize a local letter writing campaign to local legislators and/or local government about the need to fund and support fair housing programs
5. Sponsor trainings for realtors, bankers, landlords, homebuyers, tenants, public housing authority and other city/town employees to educate them on their fair housing rights and responsibilities. This activity **MUST** be done in collaboration with the Iowa Office of Civil Rights or a local civil rights commission.
6. Provide training/educational programs about fair housing for financial, real estate, and property-management professionals at local firms, including their obligations to comply with the federal Fair Housing Act and the Iowa Civil Rights Act of 1965 (this can be done by partnering with a bank, board of realtors association, or other local group and helping to sponsor a program taught by a qualified entity such as ICRC)
7. Conduct meetings with advocacy groups for members of the protected classes (i.e. persons with disabilities, immigrants, refugees, etc.) on the availability of affordable and accessible housing and determine housing needs to plan future projects
8. Establish and/or fund fair housing organizations in areas where there are no such organizations
9. Conduct fair housing testing to ensure that local housing providers and/or lenders do not discriminate (fair housing testing must be conducted by a HUD-certified fair housing agency)
10. Assist Housing Choice Voucher program participants to help locate and secure housing outside of racially concentrated areas of poverty (RCAPs) or near-RCAPs
11. Conduct outreach to housing providers and housing developers to discuss affordable and accessible housing needs in RCAPs and near-RCAPs
12. Evaluate the local zoning ordinance against the fair housing benchmarks identified in this Fair Housing Plan, using the [Iowa Zoning Guide](#). Evaluate the need for amendments to the zoning ordinance and make them.
13. Organize a tester recruitment event in collaboration with the Iowa Civil Rights Commission to help document instances of housing discrimination

Copies of Iowa's fair housing guides are included in the appendices.

Iowa Community Needs and Trends

Overview

This section provides an overview of community needs and trends in Iowa that informed the identifications of barriers to housing for certain groups as well as planned actions. This section explores the population, income, housing, and education trends of Iowa residents using data from the 2018–2022 American Community Survey (ACS) and the 2016–2020 Comprehensive Household Affordability Strategy (CHAS) datasets, as well as supplementary data from various other sources. This data is derived primarily from Iowa’s Consolidated Plan (2025-2029) and HOME-ARP Allocation Plan (2023). Iowa utilized 5-year estimates, which provide a greater sample size and more statistically reliable data than 1-year estimates. The analysis was supplemented with newer data, such as 2024 Zillow data, when appropriate.

Population Trends

Demographic trends provide insight into the makeup of Iowa’s population. Understanding the characteristics of certain groups, particularly those more vulnerable to housing challenges, allows communities in Iowa to be more responsive to housing needs.

Population Growth

Increases in population put pressure on existing housing supply and may require communities to provide additional resources and to ensure all residents have access to housing that fits their needs.

Demographic indicators are essential to understanding the state’s housing needs. The data provides a snapshot of the state’s growth and highlights the ongoing increase in population and households.

Table 4 presents the growth rate in Iowa from 2012 to 2022 according to ACS estimates.

Table 4—Population Increases (2012 to 2022)

State	Base Year Population: 2012	Most Recent Year Population: 2022	% Change
Iowa	3,047,646	3,118,836	5%

Data Source: 2012–2016 ACS Estimates (Base Year) and 2018-2022 ACS Estimates (Most Recent Year).

The population of Iowa will continue to increase based on growth projections. Table 5 provides these population estimates and the approximate growth rate from 2022 to 2040. In that period, Iowa is expected to grow its population by over 11 percent.

Table 5—Population Projections in the Next 15 Years

State	Base Year Population: 2022	Population Projections	% Change
Iowa	3,118,836	3,487,942 (2040)	11.8%

Data Source: 2018–2022 ACS Estimates (Base Year) and Woods & Poole Economics (Population Projections)

Age

Elderly residents often face additional challenges to obtaining and maintaining housing. Many elderly residents live on fixed incomes, such as social security, which can make affording high rents difficult. In addition, elderly residents often experience limited mobility and may need physical modifications to units to ensure safety.

In 2022, 17.6 percent of Iowa residents were over the age of 65. Table 6 displays the number and percentage of Iowa residents in each age category.

Table 6—Ages

Total Population	# Total Individuals	% Total Population
Under 5 years	189,797	6.0%
5 to 19 years	636,208	20.0%
20 to 34 years	626,963	19.7%
35 to 64 years	1,175,743	36.9%
65 to 74 years	321,302	10.1%
75 years or more	238,823	7.5%
Total	3,188,836	100%

Data Source: 2018–2022 ACS Estimates

Race and Ethnicity

People often experience discrimination in housing based on their race and ethnicity. 13.1 percent of Iowa identifies as a race other than White alone. Table 7 provides a breakdown of the state's population by their self-identified race. The next closest identification was Some other Race/Two or more Races at 6.4 percent.

Table 7—Race as a Percentage of the Population

Racial Category	Iowa
White	86.9%
Black or African American	3.8%
Asian	2.5%
Native Hawaiian and Pacific Islander	0.1%
Some Other Race/Two or More Races	6.4%

Data Source: 2018–2022 ACS Estimates

Table 8 presents the ethnic identities of Iowa residents: 6.5 percent of Iowa residents identified as Hispanic.

Table 8—Ethnicity as a Percentage of the Population

Ethnic Category	Iowa
Hispanic	6.5%
Not Hispanic	93.5%

Data Source: 2018–2022 ACS Estimates.

From 2017 to 2022, there have been shifts in the racial and ethnic makeup of Iowa. Table 9 displays the shifts. The percentage of residents identifying as White decreased slightly while the percentage of residents identifying as Hispanic increased from 2017 to 2022.

Table 9—Race and Ethnicity (2017 and 2022)

	2017	2022
Racial or Ethnic Group	2017	2022
White	90.6%	86.9%
Black or African American	3.4%	3.8%
Asian	2.3%	2.5%
Native Hawaiian and Other Pacific Islander	0.1%	0.1%
Hispanic or Latino (of any race)	5.7%	6.5%

Data Source: 2013–2017 ACS Estimates (Base Year) and 2018–2022 ACS Estimates (Most Recent Year).

Ancestry and National Origin

People born outside of the United States may have a limited understanding of how to navigate the housing system due to lack of familiarity with housing laws and protections and language barriers.

In 2022, 178,537 were foreign-born. Table 10 depicts the continent of origin for foreign-born residents. The most common birthplace of foreign-born residents was Latin America, followed closely by Asia.

Table 10—Foreign-Born Residents by Continent of Origin

Continent	Iowa
Europe	10.4%
Asia	35.1%

Africa	16.2%
Oceania	1.4%
Latin America	35.3%
Northern America	1.7

Data Source: 2018–2022 ACS Estimates

Limited-English Proficiency

Both foreign-born and native residents may have Limited English Proficiency (LEP). For the purposes of data collection, the U.S. Census Bureau considers a person to have LEP if they read, write, speak, and understand English “less than very well.” In practice, people with LEP lack fluency in the English language. Similarly to foreign-born residents, LEP residents have additional barriers to understanding rental contracts, fair housing protections, and laws.

In 2022, approximately 6.9 percent (207,260 people) of Iowa households were identified as LEP.

People with Disabilities

People with disabilities may need additional support to obtain and maintain housing that suits their needs. People with physical disabilities may require modifications to units to ensure accessibility. People with cognitive disabilities may need services and support to maintain independent living.

In 2022, approximately 12.2 percent of Iowa residents lived with a disability. The most common forms of disability were ambulatory difficulty, cognitive difficulty, and difficulty living independently.

From 2017 to 2022, the percentage of residents living with a disability increased in Iowa by approximately half a percent. Table 11 depicts the disability rates in Iowa in 2017 and 2022.

Table 11—Disability as a Percentage of the Population

State	2017	2022
Iowa	11.6%	12.2%

Data Source: 2013–2017 ACS Estimates (2017) and 2018–2022 ACS Estimates (2022).

Household Type

Different household types, such as roommates, presence of children, or presence of a senior, have unique housing needs, such as number of rooms, access to schools, and accessibility options.

Most households (rentals and owner-occupied) in Iowa did not include children. Table 12 depicts the percentage of household types by whether there are children present in the home. The most common household type was married couples without children, representing 30.2 percent of

households in 2022. Married couples were also the most likely to have children, representing 18.7 percent of total households.

Nearly a quarter of all households consisted of a female household with no spouse present. Table 11 depicts the percentage of family types in Iowa.

Table 12—Household Type as a Percentage of the Population

Household Type	With Children	Without Children	Total
Married Couple	18.7%	30.2%	48.9%
Cohabiting Couple	2.6%	4.9%	7.5%
Single Male Household	1.3%	17.8%	19.1%
Single Female Household	4.3%	20.2%	24.5%
Total	26.9%	73.1%	100%

Data Source: 2018–2022 ACS Estimates.

Income Trends

Income is one of several factors used to determine a household’s eligibility for a home mortgage loan or an apartment lease. Income directly affects a household’s ability to pay for not only housing but other necessities such as transportation, food, and childcare. Households with lower incomes and households in poverty often experience greater housing challenges, such as difficulty making housing payments or choosing to live in substandard units due to cost savings.

Median Income

Median income provides insight into the purchasing power of households, which directly affects their ability to obtain and maintain housing.

Median income can vary for different groups of people. Table 13 displays the household median income for various groups. All non-White racial and ethnic categories, besides Asian residents, had a median income less than the overall median income. This was also true of unmarried households.

Table 13—Median Incomes of Selected Protected Classes

	Iowa
Total Household Median Income	\$70,571
Race	
White	\$72,363
Black	\$40,592
Asian	\$79,307

	Iowa
Hispanic	\$58,899
Family Type	
Married	\$103,944
Female Householder	\$42,609
Male Householder	\$59,208

Data Source: 2018–2022 ACS Estimates, Iowa State Data Center.

Low Income Residents

As described in the previous section, households with different characteristics often have lower median incomes than average (Table 13). This section provided information about household incomes combined with other household characteristics, including household size and household type. Area median income (AMI) is used to determine if a household is considered low- or moderate-income. Households earning less than 50 percent AMI are considered low-income, and households earning less than 30 percent AMI are considered extremely low-income. Understanding the number and characteristics of low- and moderate-income households helps communities identify housing needs.

In Iowa, certain household types are more likely to be low- and moderate-income. Table 14 presents the number of low- and moderate-income households in Iowa by family type. Overall, 42.5 percent of households in Iowa were considered low- to moderate-income in 2020. In each income category, small families (2–4 people) comprised the greatest share of low- to moderate-income households. Additionally, households with at least one senior present also comprised a significant portion of low- to moderate-income households. 38 percent of extremely low-income households, 46.6 percent of low-income households, and 39.5 percent of moderate-income households included at least one senior.

Table 14—Income Category by Family Type

Household Type	Extremely Low-Income	Low-Income	Moderate-Income
Total Households	153,705	151,755	236,290
Small-Family Households	34,735	37,590	69,120
Large-Family Households	6,410	9,305	18,610
Household contains at least one person aged 62 to 74 years of age	29,940	34,115	55,595
Household contains at least one person aged 75 or older	28,720	36,700	37,775

Household Type	Extremely Low-Income	Low-Income	Moderate-Income
Household contains one or more children aged 6 years or younger	19,880	21,450	35,770

Data Source: 2016–2020 CHAS Estimates.

Poverty

Many low- and extremely low-income households live in poverty. Households in poverty lack sufficient resources to meet their basic needs. Certain groups experience poverty at higher rates than the community as a whole.

In 2022, the overall poverty rate in Iowa was 11 percent. Table 15 outlines the instances of people in poverty by race and ethnicity in Iowa. As seen in the table, poverty rates among Black or African American households, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander alone, multiracial, and Hispanic households were higher than the overall poverty rate in 2022.

Table 15—Poverty Rates by Race and Ethnicity

Race and Ethnicity	People in Poverty	Poverty Rate
White alone	259,751	9.7%
Black or African American alone	34,288	30.5%
American Indian and Alaska Native alone	2,627	27.6%
Asian alone	10,470	13.6%
Native Hawaiian and Other Pacific Islander alone	1,501	33.1%
Some other race alone	8,849	16.6%
Two or more races	25,655	17.6%
Hispanic or Latino origin (of any race)	35,429	17.4%
White alone, not Hispanic or Latino	243,253	9.4%

Data Source: 2018–2022 ACS Estimates.

Table 16 depicts the poverty rate for people with disabilities and people without disabilities in each city. The poverty rate for people with disabilities was over twice as high as the overall poverty rate for people without disabilities.

Table 16—Poverty Rates for People with Disability

City	Poverty Rate (with a Disability)	Poverty Rate (without a Disability)
Richland	26.2%	10.9%

Data Source: 2018–2022 ACS Estimates; State Data Center of Iowa

Table 17 presents the poverty rate for different types of family situations in Iowa. Married couples had the lowest poverty rate of 7 percent, while female households had the highest poverty rate, which was more than double the poverty rate of Iowa as a whole.

Table 17—Poverty Rates by Familial Status

Familial Status	Poverty Rate
Married	7%
Female Household	25.4%
Male Household	15.1%

Data Source: 2018–2022 ACS Estimates.

Table 18 presents the poverty rate for foreign-born residents in Iowa. The poverty rate for foreign-born residents was almost twice as high as it was for native residents.

Table 18—Poverty Rates by National Origin

State	Poverty Rate of Native-Born Residents	Poverty Rate of Foreign-Born Residents
Iowa	11.1%	21%

Data Source: 2018–2022 ACS Estimates.

Table 19 presents the poverty rate of two age brackets.

Table 19—Poverty Rates by Age

State	Poverty Rate of Residents Aged 18–64	Poverty Rate of Residents Aged 65+
Iowa	11.7%	8.5%

Data Source: 2018–2022 ACS Estimates.

Housing Trends

An affordable, adequate, and accessible housing stock ensures that community members can find units that fit their needs. Understanding the housing trends currently experienced in Iowa helps the community make informed decisions about projects and programs.

Housing Problems

The number and type of housing problems provide information regarding housing costs and the rehabilitation needs of housing units. Certain groups may be at a greater risk of housing

problems due to limited financial resources, unfair housing practices, and other considerations. While the housing problems discussed in this section does not represent all housing issues, the data highlights specific areas of need within the community.

The CHAS provides data on housing problems. During the fair housing planning process, the most recent CHAS estimates were derived from 2020 ACS data. CHAS defines a housing problem as a household experiencing at least one of the following four conditions:

- The housing unit lacks complete kitchen facilities.
- The housing unit lacks complete plumbing facilities.
- The household is crowded (more than one person per room).
- The household is cost-burdened (the household spends between 30 percent and 50 percent of its income on housing costs).

CHAS also provides information on severe housing problems. HUD defines a severe housing problem as a household experiencing at least one of the following four conditions:

- The housing unit lacks complete kitchen facilities.
- The housing unit lacks complete plumbing facilities.
- The household is severely crowded (more than 1.5 people per room).
- The household is severely cost-burdened (the household spends more than 50 percent of its income on housing costs).

Housing cost burden and severe housing cost burden were the most common housing problems in Iowa in 2020. Tables 20 and 21 outline the housing problems experienced by renter and owner households. Listed below are the number of Iowa households who experienced both housing cost burden and severe housing cost burden.

More recent ACS data (2019-2023) provided an updated analysis of cost burden. The more recent data showed that renter households had a cost burden of 40.2 percent, while 16.7 percent of owner households were cost burdened. For severely cost burdened households by tenure, 20 percent of renter households were impacted with 6.2 percent for owner households. These larger numbers reflect the increase in housing costs burden over the past five plus years.

Table 20—Housing Problems (Renters)

Housing Problem	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Substandard Housing	2,645	2,245	2,070	480	7,440
Severely Overcrowded	985	775	615	360	2,735
Overcrowded	2,305	1,570	1,695	1,090	6,660
Severe Housing Cost Burden	53,655	8,970	1,360	75	64,060

Housing Problem	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing Cost Burden	15,210	33,745	13,585	1,460	64,000
Zero/Negative Income (and none of the above problems)	7,150	0	0	0	7,150

Data Source: 2016–2020 CHAS Estimates.

Table 21—Housing Problems (Owners)

Housing Problem	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Substandard Housing	930	555	765	420	2,670
Severely Overcrowded	165	310	450	260	1,185
Overcrowded	580	1,160	1,960	1,060	4,760
Severe Housing Cost Burden	28,570	11,785	5,545	1,350	47,250
Housing Cost Burden	13,000	23,295	27,500	8,985	72,780
Zero/Negative Income (and none of the above problems)	4,820	0	0	0	4,820

Data Source: 2016–2020 CHAS Estimates.

CHAS data indicates certain populations (such as elderly households) and household types were more affected by housing problems. As defined by HUD, the four housing problems are insufficient plumbing, insufficient kitchen facilities, overcrowding, and/or a housing cost burden. Analyzing occurrences of housing problems across different populations is useful because it demonstrates the interaction between cost burden, overcrowding, and substandard housing conditions. As shown in Table 20 and Table 21, housing cost burden is the most significant housing problem experienced by both renter- and owner-occupied households. Additional observations from this analysis are described below.

- In Iowa, 2016-2020 data showed that roughly 12 percent are considered “cost-burdened” (30–50 percent of income spent on housing costs), and 9 percent are considered “severely cost-burdened” (more than 50 percent of income spent on housing costs).

More recent 2019-2023 ACS data showed that 23.8 percent of occupied housing units were cost burdened.

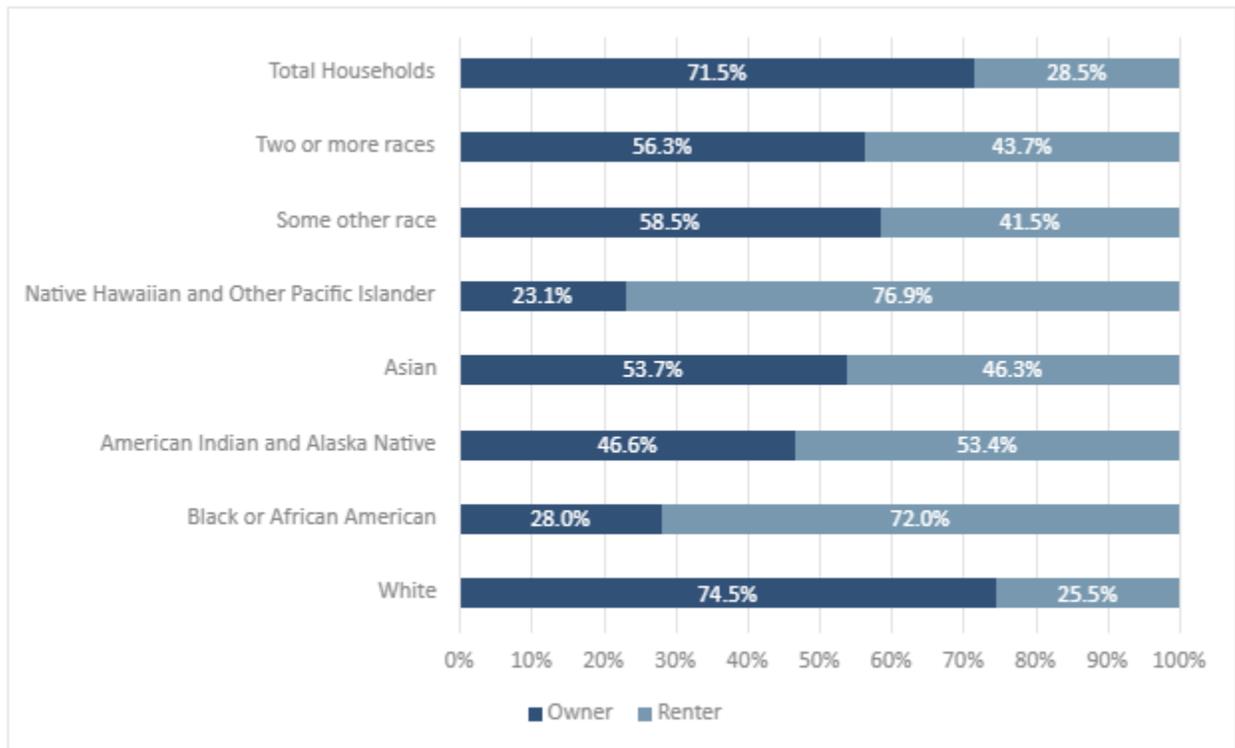
- Renters are more likely to have one or more of the four severe housing problems in each of the income categories. Twenty-three percent (almost one in four) of all renters experience one or more of the housing problems listed.
- Elderly households represent about half of the severely cost-burdened owners across each income category. However, renter family types are different across each income category, with elderly households accounting for 65 percent of moderate-income renters.

Homeownership

Homeownership provides meaningful opportunities for community members to integrate into a community with stable housing. Historically, certain groups have had limited homeownership opportunities due to restrictive borrowing practices and economic factors.

For example, homeownership rates vary across racial and ethnic groups. Figure 1 displays the homeownership rates for each racial and ethnic group in 2022. Homeownership rates were greatest among households identifying as White. Black or African American, Native Hawaiian and Pacific Islander, and American Indian and Alaska Native households had the lowest rate of homeownership.

Figure 1—Homeownership Rates by Race and Ethnicity in 2022



Data Source: 2018–2022 ACS Estimates.

Homelessness

Homelessness results from complex situations that include income, housing, and social factors. People experiencing homelessness often face unique challenges to obtaining and maintaining

housing. Some groups of people may be at a greater risk of experiencing homelessness due to vulnerabilities associated with their specific protected class. Understanding the demographics of people experiencing homelessness helps the community tailor shelter and supportive services to best support people experiencing homelessness.

Data on the demographics of people who are experiencing homelessness comes from the 2023 Iowa HOME American Rescue Plan Program (HOME-ARP) Allocation Plan. According to 2021 HMIS data for three of the CoCs serving individuals in Iowa, there were 11,117 people across 8,726 households experiencing homelessness. Specifically, 63 percent were served by the Iowa Balance of State CoC, 31 percent by the Des Moines/Polk County CoC, and 6 percent by the Sioux City/Dakota, Woodbury Counties CoC.

Certain populations within Iowa represented a greater share of the population experiencing homelessness than other populations. Table 22 provides demographic information from the 2021 Homeless Management Information System report. Black/African American residents comprised 33 percent of the homeless population, despite representing 5 percent of the total population.

Table 22—Demographics of Individuals Experiencing Homelessness in Iowa (2021)

Group	Homeless Population	Percentage of Homeless Population	General Population
Gender	-	-	-
Male	6,673	60%	50%
Female	4,346	39%	50%
Trans/Non-Binary/Questioning	57	1%	N/A
Race/Ethnicity	-	-	-
White, Non-Hispanic	6,769	62%	92%
Black/African American/African	3,570	33%	5%
American Indian, Alaskan Native, or Indigenous	451	4%	1%
Asian/Asian American	80	1%	3%
Native Hawaiian or Other Pacific Islander	54	Less than 1%	Less than 1%
Hispanic/Latino	957	9%	6%
Age	-	-	-
Under 18	2,822	26%	23%
18–24	976	9%	10%
25–54	5,587	51%	37%
55 and Older	1,608	15%	30%
Veteran Status	-	-	-

Group	Homeless Population	Percentage of Homeless Population	General Population
Veteran	1,307	10%	7%
Disability	-	-	-
Disabling Condition	5,884	54%	12%
Type of Homelessness	-	-	-
Unaccompanied Youth	881	8%	-
Chronically Homeless	1,003	9%	-

Data Source: Iowa HOME-ARP Allocation Plan (2023).

*Note that many people have multiple disabilities. The percentages in this group will not add to 100.

In 2021, HMIS data shows that there were 5,884 individuals, or over half of all people experiencing homelessness, who had a disabling condition. Of these individuals, 60 percent had a mental health disorder, 42 percent had a chronic health condition, 35 percent had a physical disability, 34 percent had a substance-related disability, and 19 percent had a developmental disability.

The National Alliance to End Homelessness reported a 56 percent rise in Iowa’s unsheltered population since 2023 in its August 2024 State of Homelessness report.

The BoS CoC PIT count conducted in late January 2024 counted a total of 2,734 homeless persons (all Iowa CoC totals). Approximately 36 percent of homeless people counted were unsheltered. Twice as many sheltered homeless persons were living in emergency housing (1,476) than in transitional housing (712). accounting for 40 percent of total instances of homelessness as described in the Point-in-Time count.

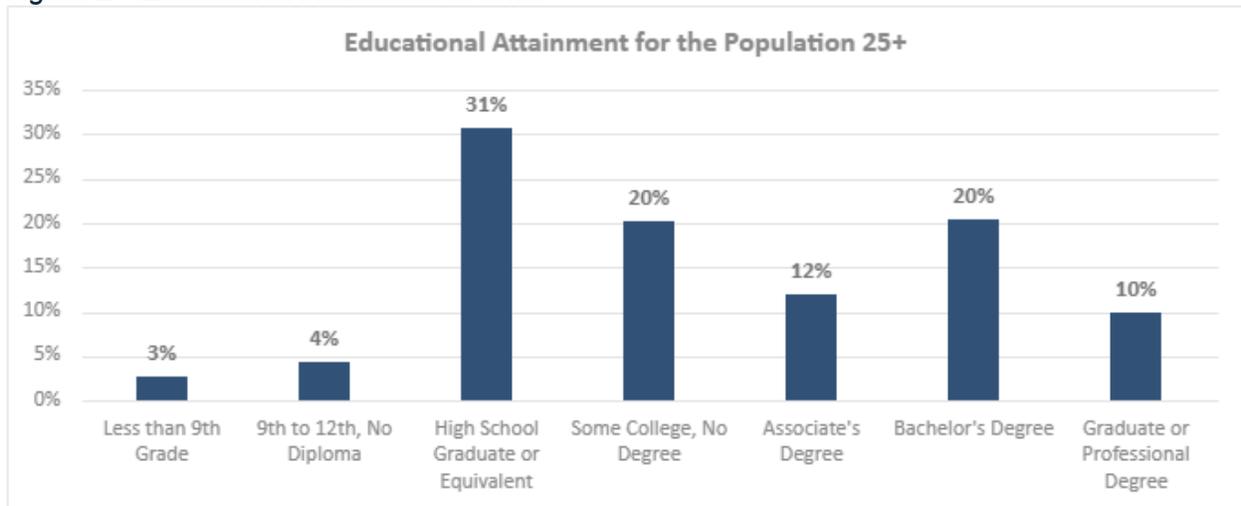
Education Trends

Access to education provides community members with opportunities to obtain higher-paying jobs and improve their quality of life. Many factors, such as poverty and geographic location, impact the quality of education people may receive. Understanding barriers to education for certain populations helps communities implement programs and practices to improve educational attainment.

Educational Attainment

Figure 2 depicts the educational attainment of Iowa residents over the age of 25 in 2022. Iowa has a comparable education attainment level to the U.S. overall.

Figure 2—Educational Attainment in Iowa



Data Source: 2018–2022 ACS Data.

Educational attainment varies by racial or ethnic group. Table 23 presents the percentage of various racial or ethnic groups that attained a high school diploma or a bachelor’s degree. In 2022, Black, Asian and Hispanic residents were less likely than White residents to obtain a high school diploma, while Black and Hispanic residents were less likely than White residents to obtain a bachelor’s degree.

Table 23—Educational Attainment by Race and Ethnicity

Group	High School Graduate	Bachelor's Degree
White	94.5%	30.7%
Black	84.2%	18.2%
Asian	80%	47.3%
Hispanic	67.5%	15.6%

Data Source: 2018–2022 ACS Estimates; S1501 Educational Attainment.

Policy Review

Overview

Public and private policies form the environment in which communities create programs and address community needs. Sometimes, policies can have adverse effects that exacerbate needs. Understanding the regulatory environment within Iowa allows the state to analyze the ways in which public and private policies impact certain populations. This section reviews zoning, assisted housing, and mortgage lending information to provide an overview of the policy landscape in Iowa.

Public Policy

Public policy decisions can set the parameters for how housing is developed and maintained. Reviewing aspects of Iowa's public policy allows the state to analyze whether certain policies or practices may inhibit housing development or create barriers to obtaining housing.

Iowa Landlord and Tenant Act

The Iowa Landlord and Tenant Act applies to rental agreements for most houses or apartments. It does not cover all situations. A rental agreement is the understanding between the landlord and tenant. It may be in writing or oral.

Duties of Landlords (Iowa Code 562A.15)

In most cases, the landlord has the duty to:

- Follow building and housing codes that affect health and safety in an important way;
- Make repairs to keep the house or apartment in a fit and livable condition;
- Provide for garbage receptacles and removal;
- Supply hot and cold running water and heat, unless the tenant pays the utility company directly, and the water heater and furnace are under the tenant's control;
- Keep areas used by the tenants of more than one apartment clean and safe; and
- Keep facilities and appliances such as electric wiring, plumbing, heating, and air conditioning in good and safe working order.

Only in limited cases can the landlord and tenant agree that the tenant will be responsible for any of the landlord's duties. In any case where the tenant agrees to be responsible for the landlord's duties, the agreement should be in writing, and fair to both.

Duties of Tenants (Iowa Code 562A.17)

In addition to paying rent, the tenant must do all of the following:

- Follow any building and housing codes that apply to tenants, and that affect health and safety in an important way;
- Keep his or her living area clean and dispose of garbage properly;

- Properly use all appliances and facilities such as plumbing, heating, wiring, air conditioning;
- Not damage or abuse the apartment on purpose or carelessly, or knowingly allow someone else to do so; and
- Avoid doing things that will disturb the neighbors' peace and quiet.

Landlord's Remedies

A landlord can take certain steps if a tenant fails to comply with the law or the rental agreement.

- If the tenant violates his or her duties in a major way, like not paying rent, the landlord may cancel the rental agreement by giving proper written notice. The length of time in the notice depends on what was done to violate the rental agreement. In most cases, the landlord has to give the tenant a chance to fix whatever the problem was. Once the landlord takes proper steps to cancel the agreement, he or she must file a court action. The court can take action to remove the tenant from the rental unit if the tenant fails to move. It is illegal for a landlord to try to force a tenant to move by any other means, such as changing locks or shutting off the utilities.
- In some cases, if a tenant damages the property, the landlord may require the tenant to pay for the necessary repairs. However, a landlord is not allowed to hold a tenant's property even if the tenant owes rent or owes money for damage to the property.

Tenant Remedies

If a landlord fails to perform some of his or her important duties, the tenant may end the agreement by giving a proper written notice. The length of time in the notice depends on what has happened. In some cases, the tenant must give the landlord a chance to fix the problem(s). Sometimes the tenant can make repairs and deduct the cost from rent owed to the landlord. Very specific steps must be taken to end an agreement or withhold rent. A tenant should also consider contacting the Housing Inspector if a landlord fails to make necessary repairs and maintain the house or apartment. Some cities have ordinances that require the tenant to give the landlord the written notice to fix the problem (s) before the Housing Inspector will inspect the home, except in the case of an emergency.

Rent Increases

If the tenant has signed a rental agreement for a set period of time (for example 6 or 12 months), the landlord can't raise the rent during that period, unless there is something in the lease that specifically allows for an increase. If a tenant rents month-to-month, the landlord must give you notice in writing that there will be an increase in your rent. The landlord must give the notice at least 30 days before the increase happens.

Ending the Rental Agreement

Normally, unless there is a violation of the agreement, neither the landlord nor the tenant can end a rental agreement during its term. For example, in most cases a six-month rental agreement cannot be ended until the six months are up. To end a month-to-month agreement,

written notice must be given at least 30 days before the next time rent is due (not including any grace period). For example, if rent is due on the first of the month, and the landlord gives a notice to end the agreement on the 10th of June, the earliest the tenancy could end would be the 1st of August.

Building Code

The Iowa building code utilizes a mix of state-mandated codes and locally adopted regulations to ensure safety and quality in construction projects. The state requires specific codes for all occupancies, while local jurisdictions can adopt those or stricter codes. Key codes include the 2021 International Building Code (IBC), 2021 International Residential Code (IRC), and the 2015 International Fire Code (IFC). Additionally, state codes like the Mechanical Code, Plumbing Code, and Fuel Gas Code are adopted, along with the 2015 International Energy Conservation Code.

Key Aspects of Iowa's Building Codes:

The state mandates the 2015 IFC and 2015 IECC for all occupancies statewide, enforced by state and local agencies.

Local Options:

Local jurisdictions have the flexibility to adopt the state-required codes or stricter ones.

Specific Codes:

- 2021 IBC: Focuses on general construction requirements for various building types.
- 2021 IRC: Specifically addresses residential construction.
- 2015 IFC: Ensures fire safety in buildings.
- State Mechanical Code: Based on the 2024 International Mechanical Code.
- State Plumbing Code: Based on the 2024 Uniform Plumbing Code.
- State Fuel Gas Code: Based on the 2024 National Fuel Gas Code, NFPA 54/58.
- 2015 IECC: Addresses energy efficiency in buildings.

Enforcement:

Both state and local authorities are responsible for enforcing the building codes.

Plan Review:

The building code requires wet-signed/sealed paper plans for construction, and preliminary meetings are held before plan review.

Exemptions:

Certain types of buildings, such as residential buildings with a limited number of family dwelling units, buildings used for agricultural purposes, and certain commercial or light industrial buildings, may be exempt from certain building code requirements.

Publicly Assisted Housing

Publicly assisted housing, also called assisted housing, refers to housing units that are subsidized through local, state, and/or federal housing programs such as Section 8. These units provide low-income residents with the opportunity to obtain affordable housing. The number of assisted units available and the demographics of people utilizing those units provides valuable insight into community needs.

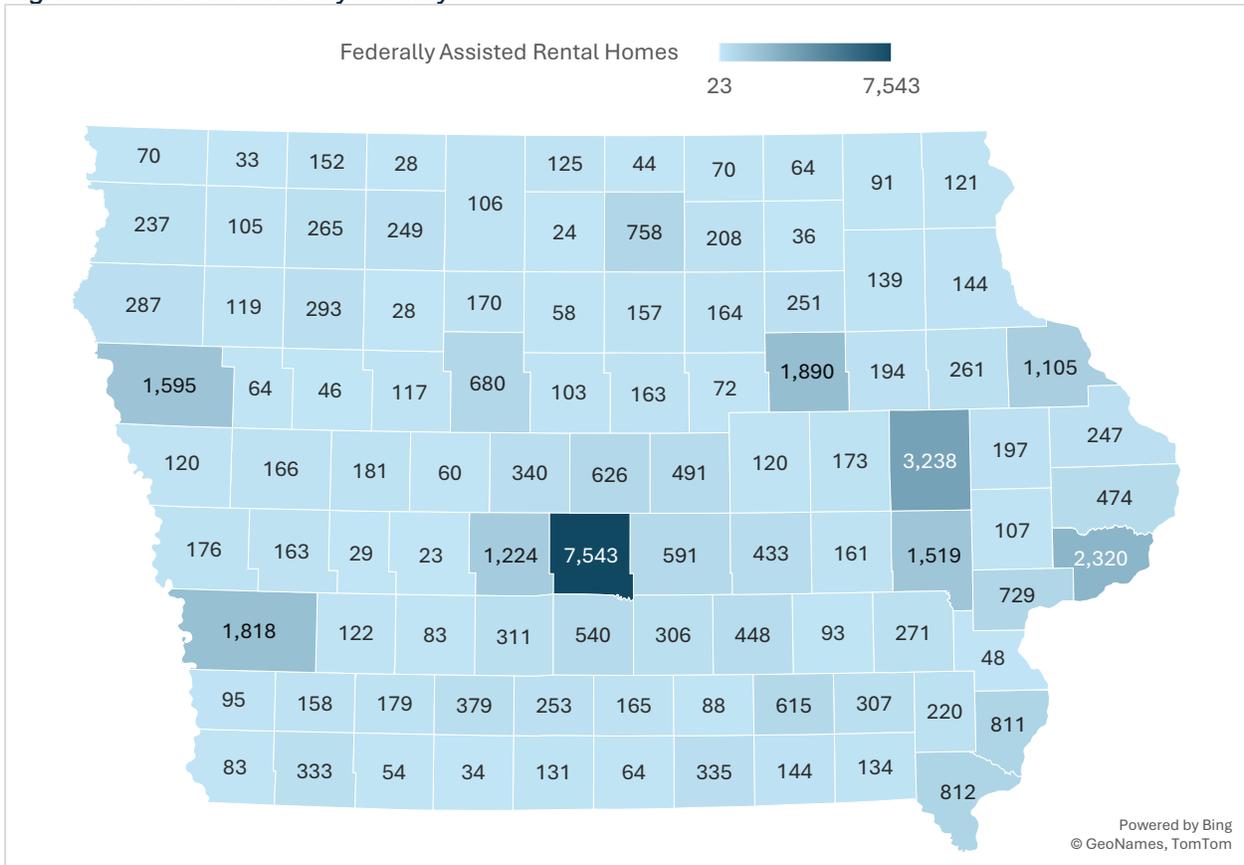
Assisted Unit Inventory

Publicly available data on the number and types of subsidized units provides insight into Iowa's current assisted housing inventory. The [National Housing Preservation Database](#) provides information on the number of assisted housing units across Iowa by program type. The 2024 Preservation Profile for Iowa indicates that the state has 41,595 total assisted rental units which is 1,028 units fewer than the state's inventory in 2022. Although the state preserved 526 assisted units in 2023, the data indicates that the total number of assisted units has decreased over time.

The database also indicates that Iowa is in need of an estimated 58,674 units that are affordable to extremely low-income renter households (at or below 30 percent area median income) and 25,234 units that are affordable to low-income renter households (at or below 50 percent area median income).

Figure 3 depicts a heat map showing which counties across the state include the most assisted units. The map indicates that there are some assisted units in every county, however more populous counties contain more assisted units than Iowa's more rural counties.

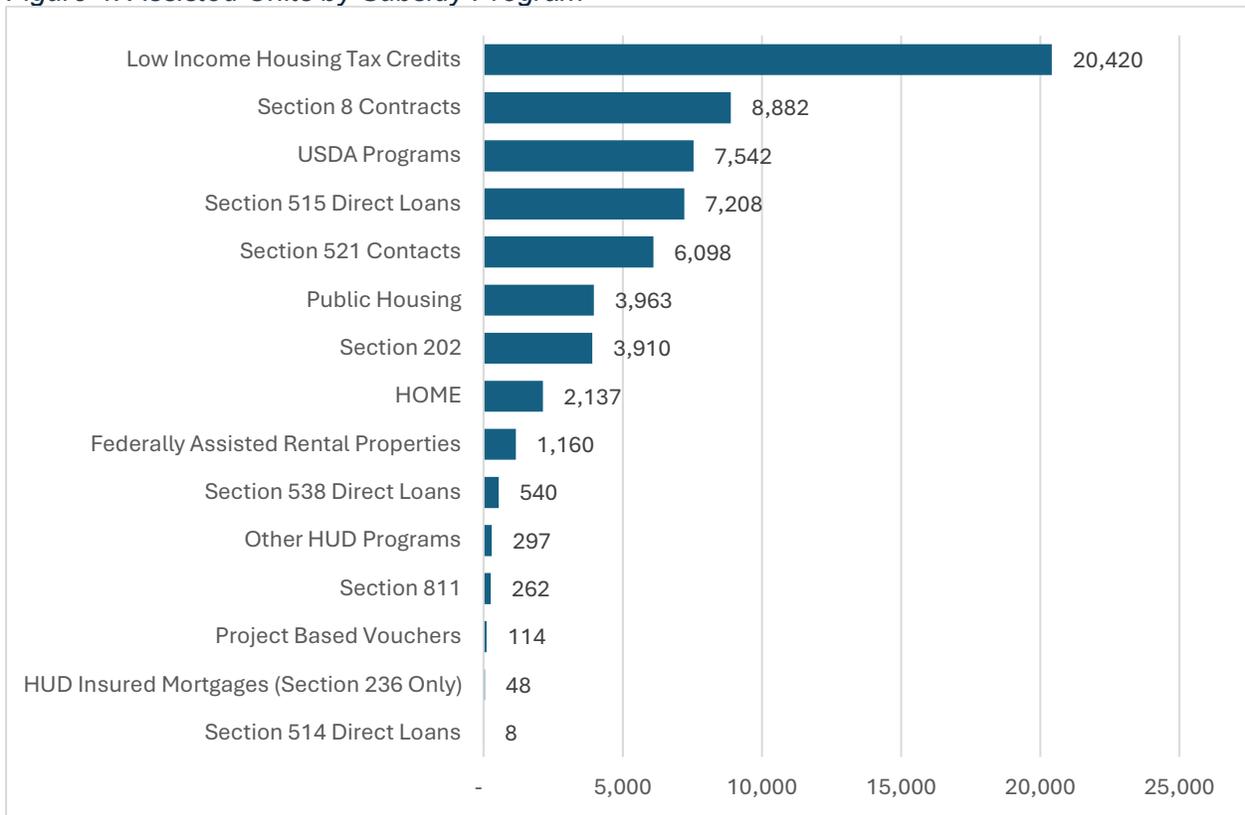
Figure 3: Assisted Units by County



National Housing Preservation Database, 2024, Iowa.

Of the state's current inventory, the top three programs that subsidize the most units include the Low-Income Housing Tax Credit (LIHTC) (20,420 units or 49 percent of all assisted units), Section 8 contracts (8,882 units or 21 percent of all assisted units), and US Department of Agriculture (USDA) programs (7,542 units or 17 percent of all assisted units).

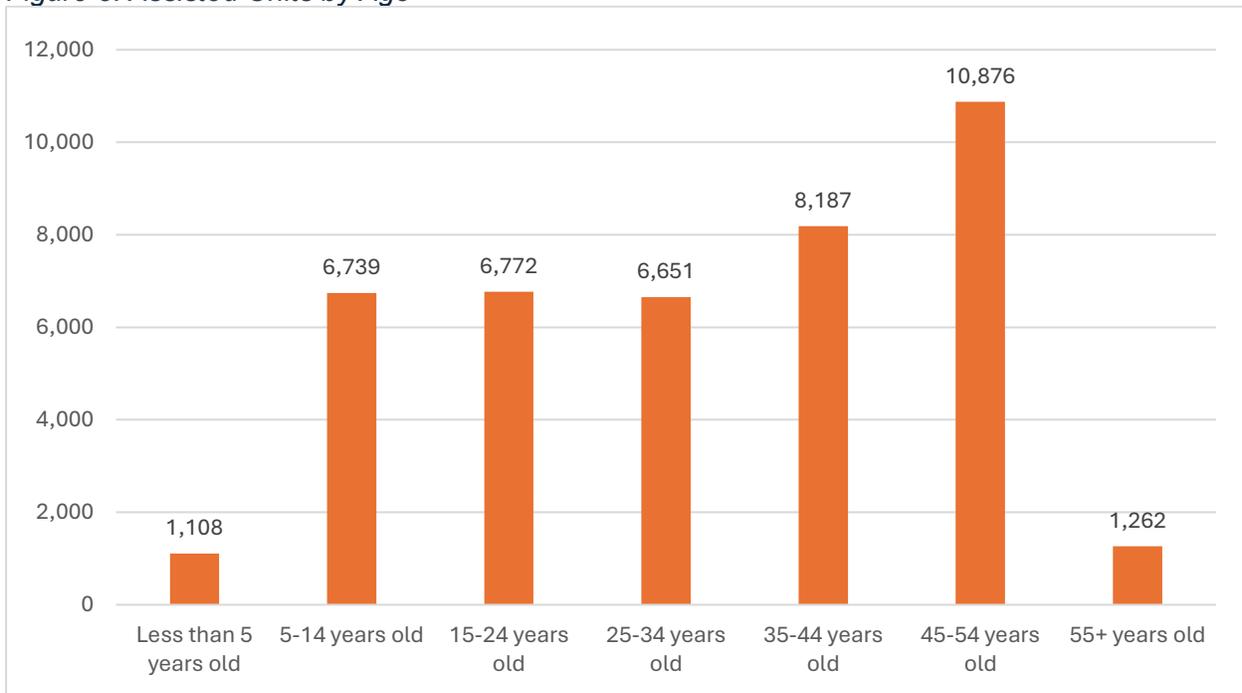
Figure 4: Assisted Units by Subsidy Program



National Housing Preservation Database, 2024, Iowa. *Units may be subsidized by more than one program.

Data from the National Housing Preservation Database also indicates that 26 percent of Iowa's assisted housing inventory is between 45 to 54 years old. Newer units constructed within the past five years comprise the smallest share of assisted units at 2.7 percent. Although the database does not include information on unit condition, having a large number of older units could signify a greater need for rehabilitation and repair of an aging inventory.

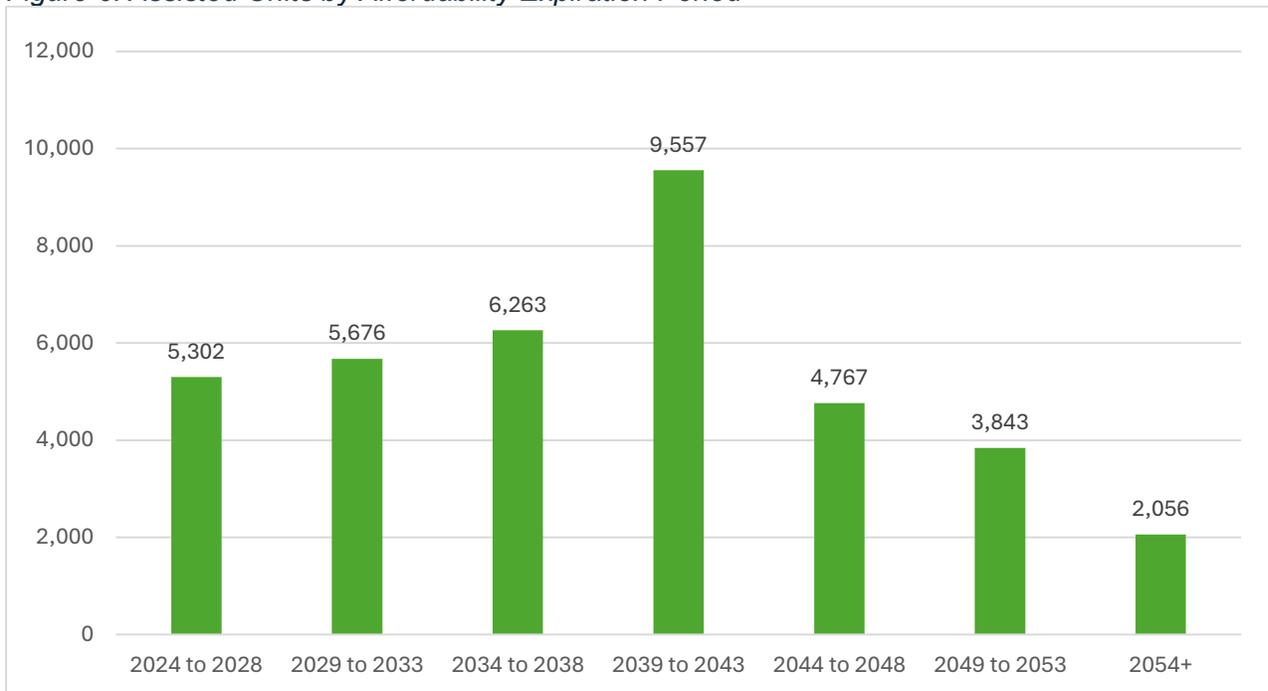
Figure 5: Assisted Units by Age



National Housing Preservation Database, 2024, Iowa.

In terms of affordability restrictions, there are 5,302 assisted units (13 percent) with restrictions that are set to expire between 2024 and 2028 if no action is taken to preserve affordability. Assuming nothing is done to preserve affordability, Iowa would lose about a quarter of its assisted housing over the next ten years. The period with the greatest estimated affordability expirations is 2039 to 2043 during which the state could lose 9,557 (23 percent) of its assisted housing units.

Figure 6: Assisted Units by Affordability Expiration Period



National Housing Preservation Database, 2024, Iowa.

Data on the demographic characteristics of households living in assisted housing can be difficult to obtain, partially because households may change. Unlike tenant-based vouchers which are associated with a specific household, project-based subsidies and rental assistance are tied to a specific unit. The database provides information on whether units in the state’s assisted housing inventory are targeted to particular populations and indicates that 19,740 units are targeted to households containing people who are elderly or disabled and 14,377 are targeted to families. About 11 percent of units do not contain publicly available information on targeted populations and 7 percent of units include a mix of targeted populations or groups not listed in Table 24.

Table 24—Targeting of Assisted Units in Iowa

Targeted Tenant Type	# Assisted Units	% Assisted Units
Elderly or disabled	19,740	47%
Families	14,377	35%
Missing	4,628	11%
Mixed	2,501	6%
Other	349	1%
Total	41,595	100%

National Housing Preservation Database, 2024, Iowa.

HUD’s [Picture of Subsidized Housing](#) dataset provides further insight into the people served by public housing, Project-Based Section 8, Section 811, and Section 202 properties in 2024. The data indicates that in 2024, 66 percent of public housing households, 80 percent of Project-

Based Section 8 households, 84 percent of Section 811 households, and 64 percent of Section 202 households were extremely low-income or earned less than 30 percent area median income. Specifically, the average annual household income for public housing households was \$18,939 while it was \$14,945 for Project-Based Section 8 households, \$18,526 for Section 202 households, and \$14,843 for Section 811 households.

In addition, large segments of households across all four programs included families where the head, co-head, or spouse of the household had a disability. Among public housing households where the head, co-head, or spouse was under age 62, 48 percent had a disability and among public housing households where the head, co-head, or spouse was above age 62, 38 percent had a disability. For Project-Based Section 8 households, these figures were 54 percent and 35 percent, respectively; for Section 202 households, these figures were 100 percent and 10 percent, respectively; and for Section 811 households, these figures were both 100 percent. Lastly, most households residing in public housing, Project-Based Section 8 units, Section 811 units, and Section 202 units were White. Specifically, 85 percent of public housing households, 72 percent of Project-Based Section 8 households, 86 percent of Section 202 households, and 79 percent of Section 811 households were White.

Housing Vouchers and Rental Assistance

Housing authorities can operate and manage assisted units—such as public housing included in the state’s assisted housing inventory—as well as administer voucher and rental assistance programs that offer housing assistance to low- and moderate-income people in their communities. Housing authorities collect information on the number of vouchers and units available as well as the demographics of people receiving assistance. Analyzing this data allows communities to better understand the types of services and programs needed.

Listed below are definitions of the types of programs included in this section.

Vouchers

The Section 8 Housing Choice Voucher (HCV) program provides vouchers to low-income households. Through the voucher program, the tenant pays the landlord 30 percent of the household income in rent, and the public housing authority (PHA) pays the remaining rental balance. Section 8 vouchers can be either project-based or tenant-based.

- **Project-Based Voucher:** A Section 8 voucher that must be used at a specific property.
- **Tenant-Based Voucher:** A Section 8 voucher that can be used at any private housing that meets the requirements of the Section 8 program.

PHAs also administer special purpose vouchers, which are distinct from the Section 8 HCV program. These include:

- **Mainstream:** Offers rental assistance to families that include a non-elderly person with disabilities. These vouchers were previously known as Mainstream 5 or Section 811 vouchers.
- **Family Unification Program (FUP):** Provides rental assistance to eligible families with inadequate housing and eligible youth exiting foster care who are homeless or at imminent risk of homelessness.
- **Non-Elderly Disabled (NED):** Offers rental assistance to households where the head, co-head, or spouse is a non-elderly person with disabilities. There are several categories

of NED vouchers including NED Category 1, NED Category 2 (also known as Nursing Home Transition vouchers), Designated Housing, and Certain Developments vouchers.

- **HUD Veterans Affairs Supportive Housing (HUD-VASH):** Offers rental assistance paired with case management and supportive services to eligible veterans experiencing homelessness.

HUD’s [Public Housing Data Dashboard](#) and [Housing Choice Voucher Data Dashboard](#) indicate that among Iowa’s 63 PHAs, 44 PHAs operate public housing units and 37 PHAs administer HCV programs. Table 25 provides the number of public housing units and vouchers available and in use in the state in 2025. Combined, the state’s PHAs manage 3,964 public housing units, 24,068 HCVs, 319 Mainstream vouchers, 178 FUP vouchers, 513 NEDs, and 498 HUD-VASH vouchers.

Table 25: Iowa PHA Voucher Utilization Data

Program Type	# Vouchers/Units Available	# Vouchers/Units in Use	Voucher/Unit Utilization Rate
Public Housing	3,964	3,748	94.6%
HCV	24,068	19,244	80.5%
Mainstream	319	239	74.9%
FUP	178	120	67.4%
NED	513	482	93.9%
HUD-VASH	498	409	82.1%

HUD Public Housing Data Dashboard, data as of July 2025 (data on public housing). HUD Housing Choice Voucher Data Dashboard, data as of April 2025 (data on Certificate, Mainstream, FUP, NEDs, and HUD-VASH).

HUD’s [Picture of Subsidized Housing](#) dataset also provides insight into the people that used a HCV in 2024. Information on public housing households is described in the previous section. The data indicates that 82 percent of HCV households were extremely low-income or earned less than 30 percent area median income. Specifically, the average annual household income for HCV recipients was \$15,208. As with public housing, large shares of HCV households included a head, co-head, or spouse with a disability. Among HCV households where the head, co-head, or spouse was under age 62, 46 percent had a disability and among public housing households where the head, co-head, or spouse was above age 62, 63 percent had a disability. Lastly, 67 percent of HCV households were White.

Private Policy

Private policy refers to the way in which non-government entities interact with the housing system. This includes private landlords, leasing agencies, and banks. Despite being non-governmental, private institutions play an important role in the housing process. Analyzing the policies and patterns of private entities provides insight into barriers that may exist to serving certain groups of people.

Mortgage Lending

Mortgage lending is a large industry that has direct impacts on the housing system. Most people wishing to purchase a home must be approved for financing from a private entity, such as a bank. Analyzing the lending practices of banks in Iowa highlights trends in borrowing practices and can help identify gaps in the lending system for certain populations.

An analysis of mortgage lending in Iowa primarily relies on lending data made publicly available through the Home Mortgage Disclosure Act (HMDA) Regulation C. HMDA, enacted in 1975, requires that financial institutions, including banks, savings associations, credit unions, and other lenders, annually disclose mortgage data to the public and regulators to show lending patterns. This data serves various purposes, including determining whether lenders are meeting community housing needs, supporting public officials in investments to encourage development, and identifying potential patterns of discriminatory lending that are illegal under the Fair Housing Act.

It is important to note that HMDA data alone cannot conclusively identify individual instances of discrimination in lending. Instead, the HMDA analysis aims to explore patterns of discrepancies in lending outcomes and identify areas of concern. If a pattern of discrimination is suspected based on the data, an in-depth investigation will look at the lending institution's loan data, policies, and practices to determine if discrimination has occurred based on a protected class.

HMDA Data Terminology

The following terms are used regarding mortgage lending in HMDA data:

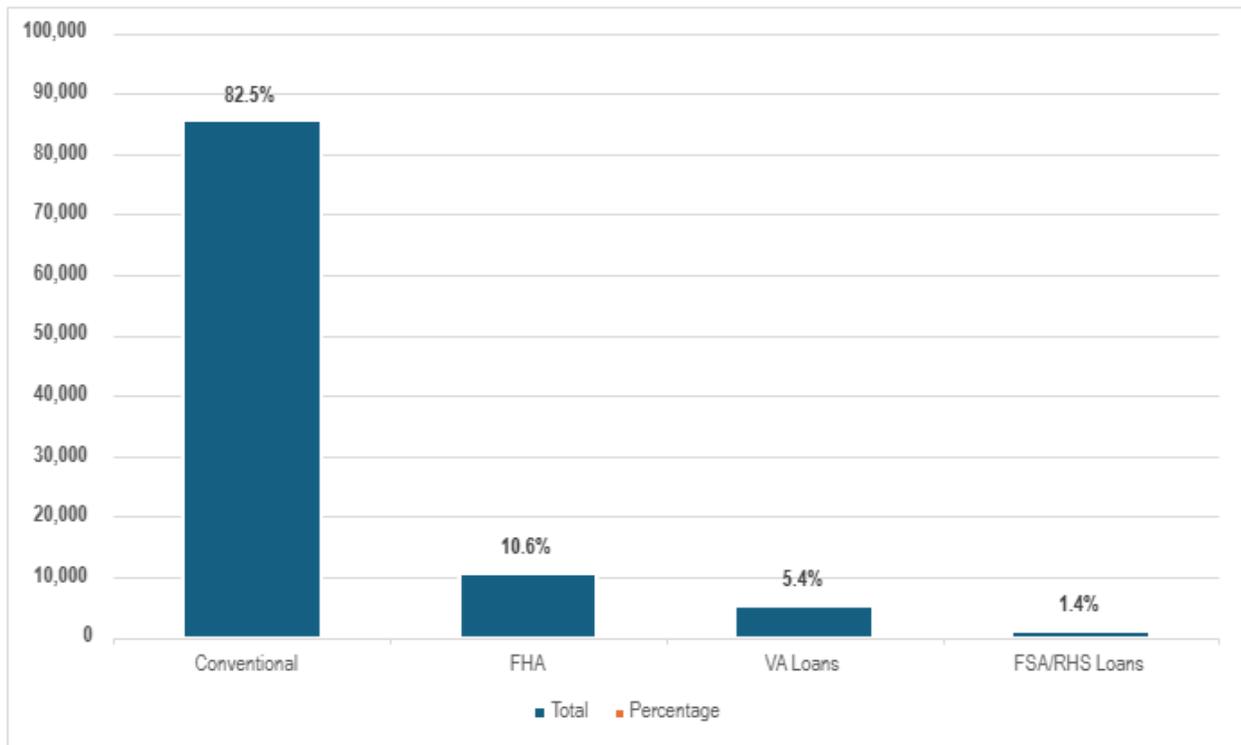
Loan origination	The multi-step process by which borrowers apply for a loan and lenders process the loan application. ¹
Lien	A legal right that gives an individual or entity a claim to a collateral property until the outstanding debt is paid off. ²
Conventional loan	Any mortgage loan that is not insured or guaranteed by the government (such as under the Federal Housing Administration, Department of Veterans Affairs, or Department of Agriculture loan programs). ³
FHA loan	A mortgage loan guaranteed by the Federal Housing Administration. Serves low- and moderate-income households with mortgage, refinancing, or rehabilitation loans. ⁴
VA loan	A mortgage loan guaranteed by the U.S. Department of Veterans Affairs. Serves eligible veterans, service members, or surviving spouses with mortgage, refinancing, or rehabilitation loans. ⁵
FSA/RHS loan	A mortgage loan guaranteed by the U.S. Department of Agriculture's Farm Service Agency/Rural Housing Service. Serves low- and moderate-income households living in rural areas with mortgage, refinancing, or rehabilitation loans. ⁶

- First lien** Also called the first mortgage lien or the primary lien, is the first lien that is placed on a property.⁷
- Subordinate lien** Any lien that is not the first lien. The order of the lien on the property determines the order in which the lien is repaid.⁸
- Cash-out refinancing** A type of mortgage refinancing that converts home equity into cash. A new mortgage is taken out for more than the previous mortgage balance, and the difference is paid in cash.⁹

HMDA Overview

In 2023, 103,992 loan applications were reported by financial institutions in Iowa. Figure 7 displays the different types of loans. Most loans (82.5 percent) were conventional loans, while 5.4 percent were VA loans, 10.6 percent were FHA loans, and 1.4 percent were FSA/RHS loans.

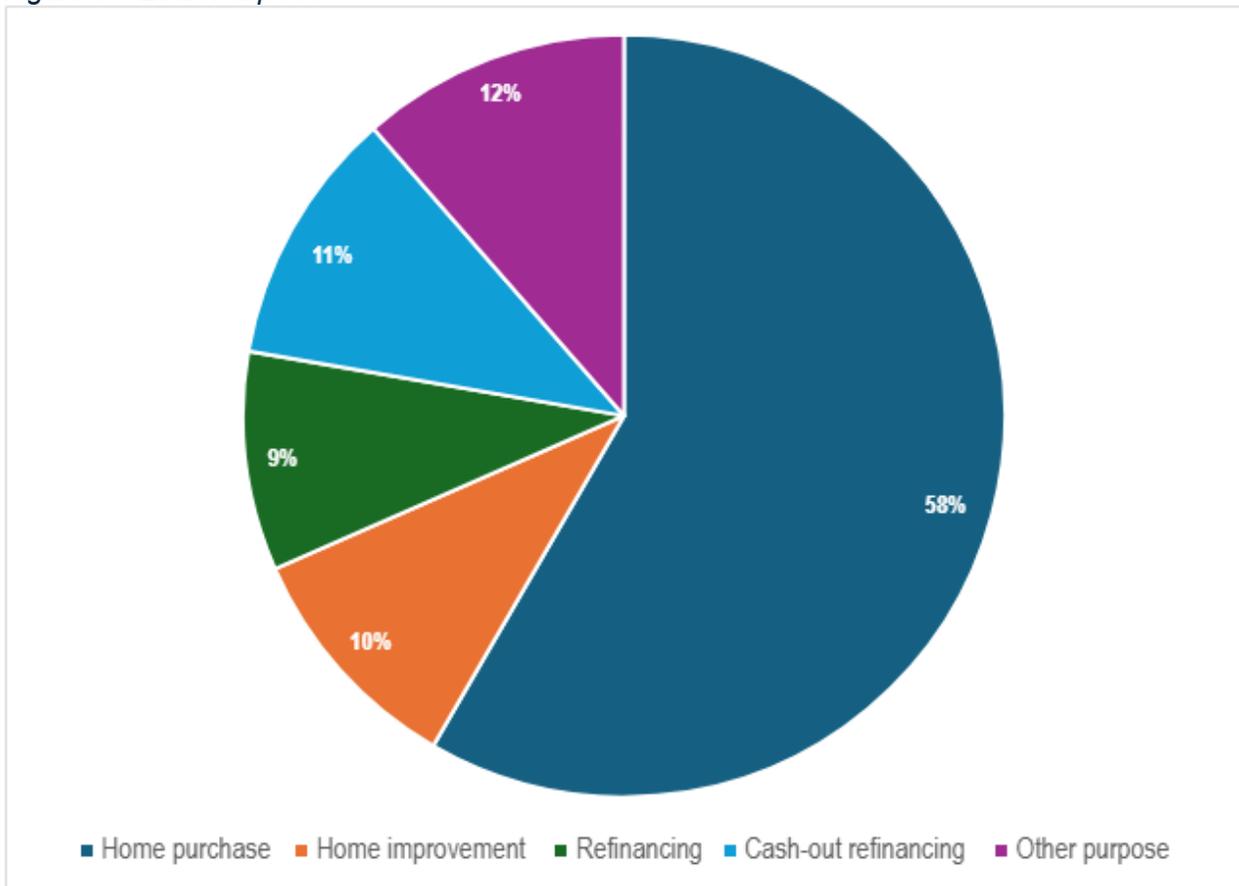
Figure 7—Types of Loans



Data Source: 2023 HMDA Estimates.

Across Iowa, 58 percent of loans were used for home purchases. Twelve percent was used for other purposes, nine percent of loans were used for refinancing and 10 percent for home improvement. 94 percent of all loan applicants used the loan for their primary residence, as opposed to a secondary residence or investment property.

Figure 8—Loan Purpose



Data Source: 2023 HMDA Estimates.

HMDA also provides information on the action taken, or status of a loan application. Explanations of the actions are listed below.

- Loan originated: The loan application was approved and the financial institution offered credit to the applicant.
- Loan approved but not accepted: The loan application was approved but the applicant did not accept the offer of credit.
- Loan denied: The loan application was denied.
- Loan withdrawn by applicant: The applicant withdrew the loan application before the financial institution made a credit decision on the application.
- Loan closed due to incompleteness: The loan application was closed due to lack of information. The financial institution sent the applicant a written notice of incompleteness.
- Loan purchased: The financial institution purchased the loan after closing and did not make a credit decision prior to closing.

In 2023, most loan applications were originated (63 percent). Table 26 depicts the loan outcomes for Iowa. 12 percent were denied, and three percent were withdrawn.

Table 26—Actions Taken on Loans

Action Taken	Percentage
Originated	63%
Approved But Not Accepted	12%
Denied	12%
Withdrawn	3%
Incomplete	10%
Purchased	0.09%
Other	0%

Data Source: 2023 HMDA Estimates.

Characteristics of Loan Applicants

One method to explore whether barriers to lending opportunities exist is to analyze differences in outcomes by an applicant’s demographic characteristics. Table 27 depicts the race, ethnicity, gender, and age characteristics of loan applicants in Iowa. The data indicates that most applicants are White (68 percent), with less than 5 percent of applicants identifying as a race other than White. Additionally, 23 percent of applicants identified as Hispanic or Latino, and 29 percent of applicants identified as male while 18 percent identified as female. Finally, the two most common age brackets were 25–34 and 35–44, accounting for 47 percent of loan applicants.

Table 27—Characteristics of Loan Applicants

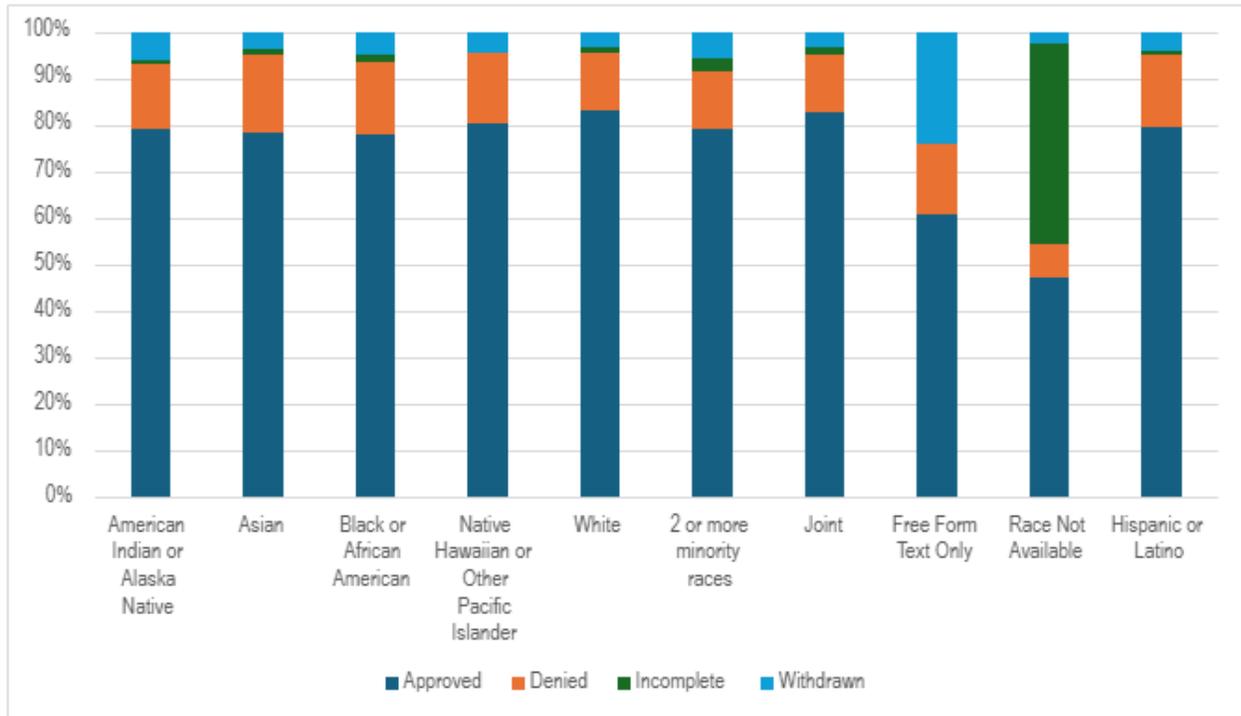
Category	Percentage
Race	-
White	72%
Asian	2%
Black or African American	2%
American Indian or Alaska Native	0.36%
Native Hawaiian or Other Pacific Islander	0.11%
Two or More Minority Races	0.1%
Race Not Available	22%
Ethnicity	-
Not Hispanic or Latino	72.3%
Hispanic or Latino	5.1%
Ethnicity Not Available	9%
Gender	-

Male	28%
Female	19%
Multiple Co-Applicants with Different Genders	35%
Sex Not Available	18%
Age	-
25-34	21%
35-44	21%
45-54	17%
55-64	12%
65-74	7%
<25	6%
>74	2%

Data Source: 2023 HMDA Estimates.

White applicants had the highest loan origination rate at 72 percent. Figure 9 depicts the percentage of loan applications by action taken for race and ethnicity compared to the jurisdiction as a whole. Black and African American and Asian households had the lowest origination rate of 78 percent. White households had the lowest denial rate at 13 percent, while Asian households had the highest denial rates at 17.

Figure 9—Actions Taken by Race and Ethnicity

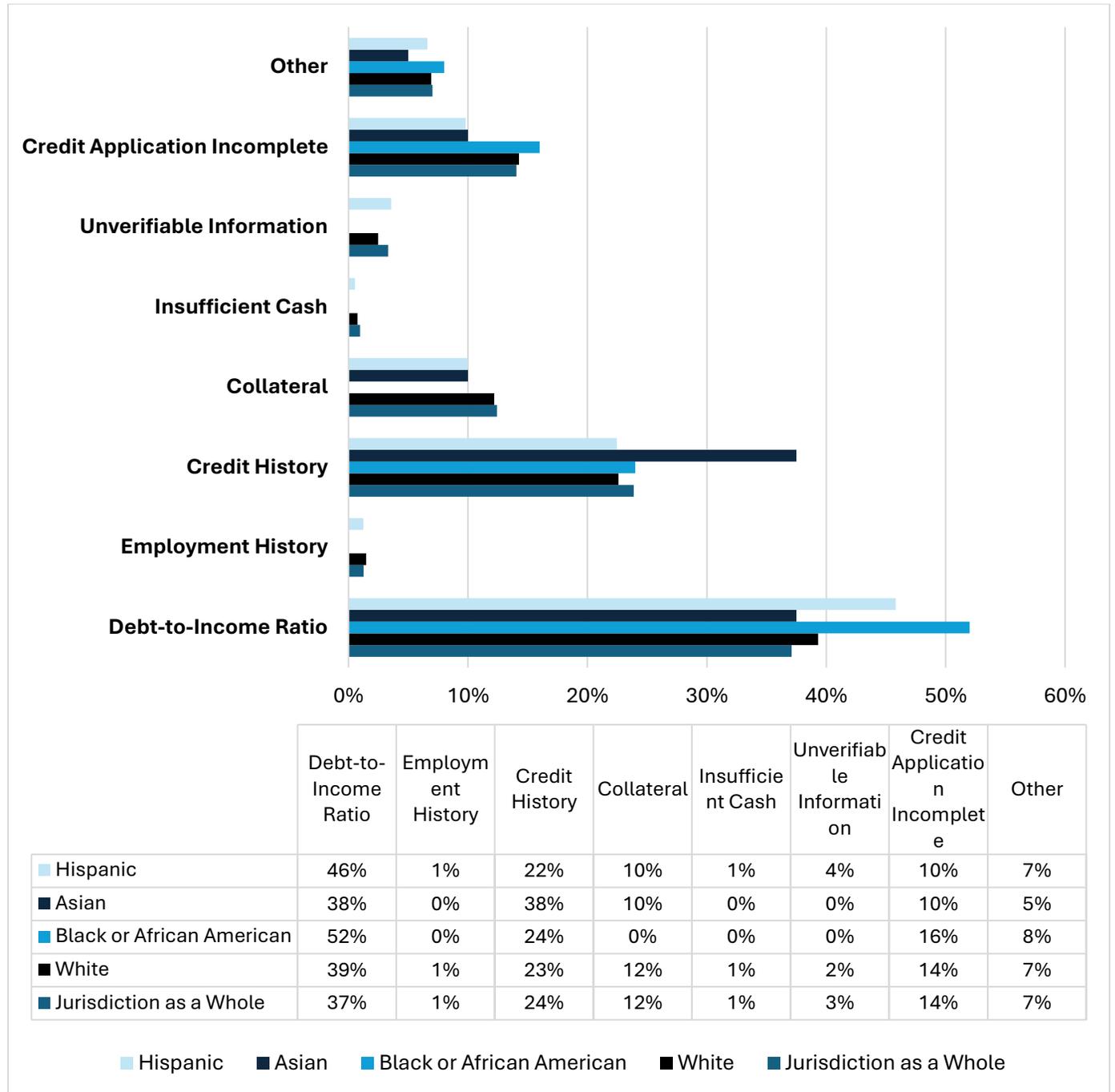


Data Source: 2023 HMDA Estimates.

Loan Denial by Race/Ethnicity

Understanding which communities have higher denial rates of loans provides insight into the needs of homebuyers. In 2023, 1,666 loan applications were denied. The most common loan denial reason was debt-to-income ratio. Figure 10 shows that there was variation in the primary reasons for denial by race and ethnicity. Asian, Black or African American, Hispanic, and White applicants were most likely to be denied because of debt-to-income ratios. Black or African American and Hispanic households experienced the greatest denials of debt-to-income ratios (52 percent and 46 percent respectively). American Indian applicants were most often denied due to credit history, and Native American or Pacific Islander households were most often denied due to collateral.

Figure 10—Denial Reasons by Race and Ethnicity



Data Source: 2023 HMDA Estimates.

Evidence of Housing Discrimination

Overview

Certain groups may face housing discrimination when buying or renting housing units. Housing discrimination can occur at all points in the housing process, including inquiries and applications for rental housing, lease conditions, rental housing renewal, viewing homes for sale, offering to purchase a home, and getting a mortgage. Understanding the nature of housing discrimination in Iowa allows the community to better respond to resident needs. This section explores themes from consultations with fair housing organizations and reviews complaint data from two different sources. In analyzing fair housing complaints, Iowa utilized the most recent data available from the HUD Office of Fair Housing and Equal Opportunity and the Iowa Office of Civil Rights.

Context from Fair Housing Organizations

Fair housing organizations play a vital role in the community. These organizations often represent residents who believe they have been discriminated against, provide fair housing training, and conduct outreach. As a result, representatives from these organizations can provide valuable context into how residents experience housing discrimination.

During the fair housing planning process, Iowa consulted two fair housing organizations. Listed below are key themes that emerged from those consultations regarding the fair housing needs of the community.

- Fair housing organizations in Iowa find that reasonable accommodation for people with disabilities, such as parking, assistance animals, and communication assistance, is their largest service area. This means that there is a need in the community for more accessible housing options and practices.
- Participants noted that migrant workers, immigrants, and people with limited English proficiency are often unaware of their housing rights.
- Organizations emphasize that rising housing costs create financial and legal hardships for their clients.
- Participants recommended fair housing training, testing, and outreach to service organizations, developers, and residents to help promote fair housing knowledge.

Fair Housing Complaints

People who believe they have experienced housing discrimination have several avenues to file a complaint. Residents can file a complaint with HUD's Office of Fair Housing and Equal Opportunity Office (FHEO) for allegations of housing discrimination on the basis of a federally protected class. Residents of Iowa can also file complaints with the Iowa Office of Civil Rights regarding discrimination against state or federally protected classes. This section presents the most recent fair housing complaint data from both sources. Analyzing complaint data allows communities to identify trends in fair housing discrimination.

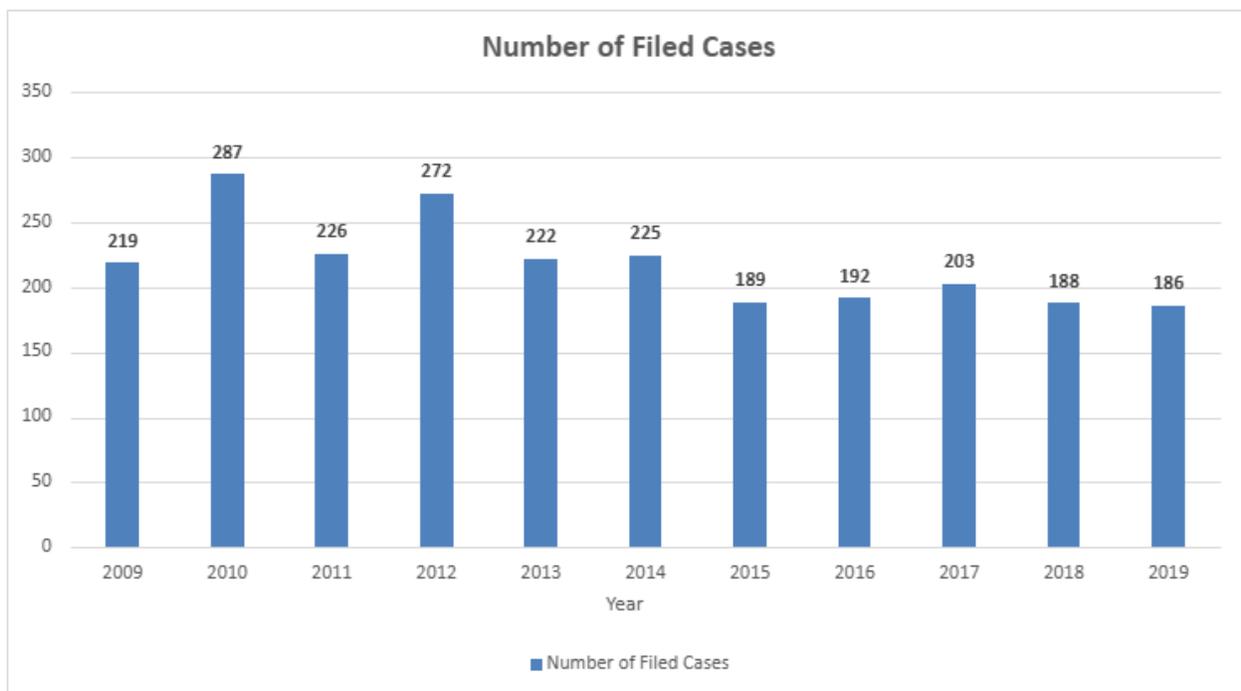
The Office of Fair Housing and Equal Opportunity

HUD provides publicly available data on housing complaints submitted to FHEO since 2000, with the most recent data being for 2019. For this analysis, data from 2009 to 2019 was utilized. While HUD complaint data is a useful resource for better understanding the prevalence and

nature of housing discrimination, it is often an undercount of instances of housing discrimination because many individuals who experience discrimination or suspect they have been discriminated against do not report it. There are various reasons an individual may not report housing discrimination such as lacking evidence to support their case; fearing retaliation for reporting the event; being unwilling to participate in an investigation; not wanting to bring attention to themselves, the suspected perpetrator, or the incident; not knowing how to file a complaint; not knowing that the discrimination they experienced is a fair housing violation; and more.

FHEO data indicate that from 2009 to 2019, there were 2,409 complaints filed by individuals for housing discrimination in which the alleged violation took place (Figure 11). There does not appear to be a trend in the number of cases filed each year.

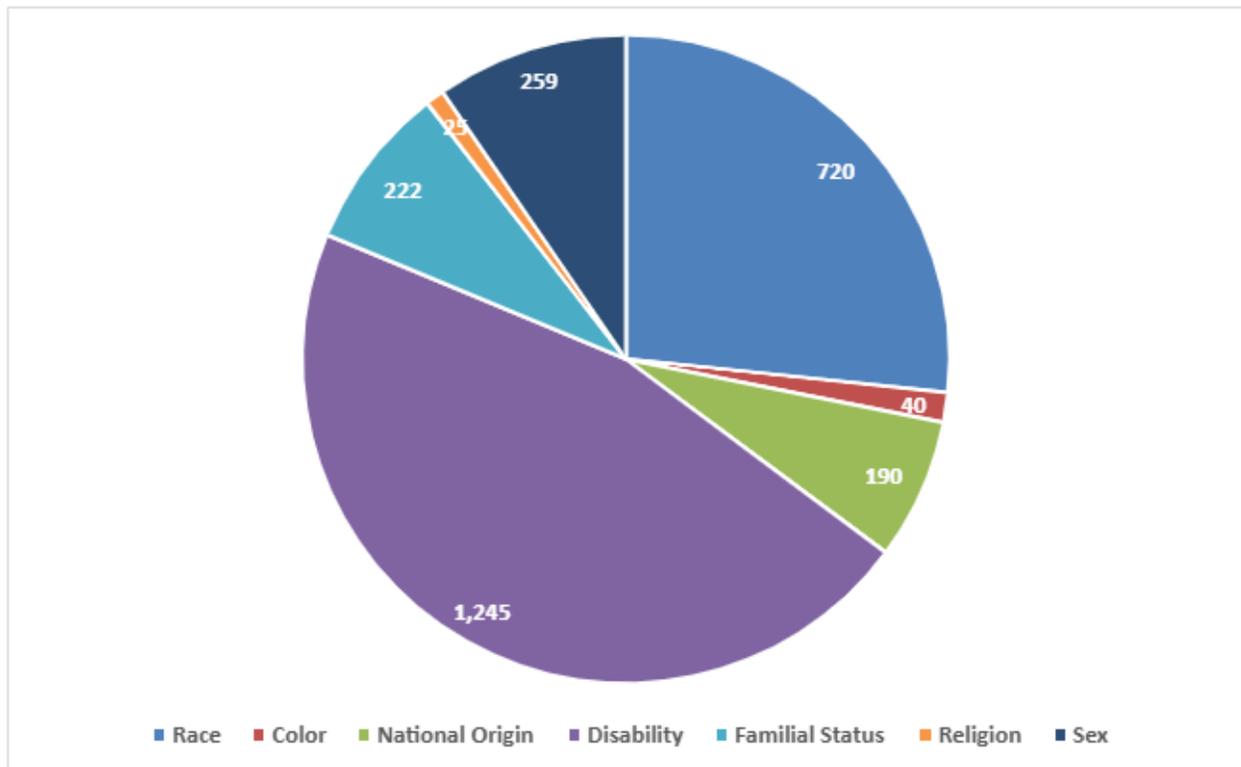
Figure 11—FHEO Filed Complaints by Year



Data Source: HUD Data Catalog (FHEO Filed Title VII Cases).

Of the 2,409 complaints filed during the time period, 1,245 (52 percent) were for discrimination on the basis of disability. Figure 12 displays the basis of complaints. Note, complaints can include multiple bases (such as race and national origin). The second most common basis for complaints was sex, which accounted for 11 percent of complaints.

Figure 12—Housing Complaints by Protected Class



Data Source: HUD Data Catalog (FHEO Filed Title VII Cases).

Iowa Office of Civil Rights (IOCR)

Iowa residents also have the option of reporting alleged instances of housing discrimination to the IOCR, which works with HUD to process and investigate claims filed both with FHEO and IOCR.

Fair Housing Testing and Training

Fair housing testing and training help communities understand gaps in fair housing practices and fair housing laws and regulations. They serve as tools to reduce housing discrimination. Knowing how to use and access these tools equips communities with resources to better confront discrimination and unfair housing practices.

Fair housing testing is provided by organizations receiving Fair Housing Initiatives Program (FHIP) funding from HUD. FHIP organizations help handle fair housing complaints, investigations, and testing. FHIPs send fair housing testers to properties suspected of practicing housing discrimination to uncover information about any potential fair housing issues.

Fair Housing Action Plan

Introduction

Through the fair housing planning process, Iowa gained valuable insight into the housing needs of many groups with certain characteristics. Iowa identified five primary barriers to fair housing, also known as impediments to fair housing. Iowa also identified a set of actions to address each barrier and promote affordable, available housing for all residents.

Identified Impediments to Fair Housing

Impediments to fair housing restrict fair housing choice or access to opportunity. Impediments to fair housing can include local segregation, disproportionate housing needs in one section of the population, and documented instances of housing discrimination. Identifying impediments to fair housing allows Iowa to explore programs and policies to help encourage fair housing.

Iowa identified three impediments to fair housing, which are listed below.

Table 28—Identified Impediments to Fair Housing

Impediment	Description/Contributing Factors	Impacted Groups
Limited supply of affordable housing.	Low affordable housing supply often means that residents must live in either unaffordable or unsuitable living conditions (such as overcrowding). All residents are affected by a lack of affordable housing, but oftentimes certain groups face additional barriers to securing affordable housing, such as accessibility needs, difficulty navigating the housing system, or intentional exclusion.	All
Limited knowledge of their fair housing rights and landlord responsibilities.	In a survey conducted for the Consolidated and Fair Housing Planning process, 29 percent of respondents were not aware of how to report a fair housing violation. In addition, 27 percent of respondents indicated that they didn't know how to request reasonable accommodation. 60 percent of the respondents would like to see more fair housing education and resources available to the public.	All

Impediment	Description/Contributing Factors	Impacted Groups
	<p>Fair housing reporting and reasonable accommodation requests are important aspects of fair housing. Knowing their rights, responsibilities, and options under the Fair Housing Act equips residents with the knowledge to advocate for their needs.</p>	
<p>Lack accessible features for people with physical disabilities and seniors.</p>	<p>During consultation sessions, stakeholders working with certain populations expressed difficulty in finding physically accessible units for clients. 53 percent of survey respondents felt that having a disability a top primary discrimination issue with the most prevalent filed complaints.</p> <p>People with physical disabilities, such as wheelchair users, and seniors often have accessibility requirements for housing units. Some examples of accessibility requirements include ramps, grab bars, elevators, wide doorways, and walk-in showers. These modifications make it possible for people with limited physical mobility to reside safely and comfortably in their homes.</p>	<p>People with a disability</p>

Recommended Actions

Iowa recognizes that the impediments described in the previous section have impacts on how certain groups find and maintain housing that suits their needs. Iowa is committed to removing barriers to fair housing. Through the fair housing planning process, Iowa identified a set of actions to take over the next five years to work toward overcoming the identified impediments to fair housing.

Table 29—Fair Housing Action Plan

Impediment	Strategy	Action Steps	Connection to Impediment
<p>There is a low supply of affordable housing in Iowa.</p>	<p>Iowa will create and maintain affordable housing stock, both rental and owner-occupied, throughout the state with the construction of new affordable rental housing, rehabilitation of existing affordable housing, and provision of TBRA to eligible populations to access affordable, safe rental housing.</p> <p>Iowa will support eligible homebuyers by providing financial assistance in the form of down payment assistance and other eligible closing costs to encourage homeownership for LMI households. Iowa will create and preserve affordable homeownership housing by assisting eligible homeowners to rehabilitate their homes to</p>	<p>Iowa will analyze the most effective ways to reach all populations and will explore using those methods to advertise the housing programs.</p>	<p>Building additional housing units with affordability criteria, such as income limits, increases the housing supply. Ensuring those units are affordable helps all populations access those units.</p> <p>Assisting certain groups with homeownership opportunities. However, these populations must be aware of the program and their requirements. Targeted outreach to populations who may have not otherwise known about the program increases the likelihood of them applying and receiving assistance.</p>

	address accessibility needs and requisite structural and other repairs.		
Affordable housing options often lack accessible aspects for people with physical disabilities and seniors.	IFA will continue to award points if 50 percent of the HOME-assisted units are fully accessible (not adaptable) and shown as such in the plans submitted with the HOME Rental application package.	Iowa will analyze barriers to ADU development in each of their communities and develop policy and program suggestions to overcome these barriers.	Many housing units can be modified to be more accessible. For instance, ramps and grab bars can be added to the front of the unit to make the entrance easier to get to. Modifying existing units increases the accessible housing supply. these populations must be aware of the program and their requirements. Targeted outreach to populations who may have not otherwise known about the program increases the likelihood of them applying and receiving assistance.
Limited knowledge of their fair housing rights and landlord responsibilities.	Iowa will organize and host a fair housing training for organizations working with residents.	Iowa will continue to provide online and in-person workshops to enhance knowledge of fair housing rights and responsibilities. Iowa will continue to work with municipal grant recipients of state and federal funds to implement fair housing activities to enhance the awareness of landlord responsibilities and tenant rights	Service providers often have direct contact with certain groups. Equipping staff with fair housing knowledge that is specific to the characteristics of the groups they serve allows them to assist residents with questions and complaints.

Appendix

Table 1A—Other Federal Regulations Regarding Fair Housing

Federal Law/Regulation	Brief Description
<u>Title VI of the Civil Rights Act of 1964</u>	Title VI prohibits discrimination against any person on the basis of race, color, and national origin in programs and activities that received federal funding.
<u>Age Discrimination Act of 1975</u>	This Act prohibits discrimination on the basis of age in programs and activities that receive federal funding.
<u>Violence Against Women Act of 1994</u>	The Violence Against Women Act provides housing protections for people who have previously or are currently experiencing domestic violence, sexual assault, dating violence, or stalking and are applying for or living in housing units that receive federal funding.
<u>Equal Credit Opportunity Act of 1974</u>	This Act prohibits discrimination on the basis of race, color, religion, national origin, sex, marital status, age, receipt of public assistance, or good faith exercise of any rights under the Consumer Credit Protection Act. Creditors must also provide applicants with the reasons they were denied credit, if it is requested.
<u>Consumer Credit Protection Act of 1968</u>	This Act provides protections for consumers from creditors, banks, and credit card companies by requiring the full disclosure of the terms and conditions of finance charges in credit transactions and offers to extend credit.
<u>Home Mortgage Disclosure Act (1975) (“HMDA”)</u>	This Act requires that many financial institutions maintain, report, and publicly disclose information about mortgage loans.
<u>Section 1031 Of Dodd-Frank Wall Street Reform and Consumer Protection Act (2010) (“Dodd-Frank”)</u>	Section 1031 of the Dodd-Frank Act provides protections for consumers by allowing the Consumer Financial Protection Bureau to prevent individuals or service providers from committing unfair, deceptive, or abusive acts or practices under federal law in connection with consumer transactions for financial products or services.
<u>Executive Order 11063: Equal Opportunity in Housing (1962)</u>	This Executive Order prohibits discrimination on the basis of race, color, creed, and national origin in the sale, leasing, rental, or other disposition of properties owned or operated by the federal government or provided with federal funding.

Federal Law/Regulation	Brief Description
Executive Order 12892: Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing (1994)	This Executive Order requires federal agencies to affirmatively further fair housing in their programs and activities and tasks the secretary of HUD with coordinating efforts to affirmatively further fair housing.