Analysis of Impediments to Fair Housing Choice

City of Sioux Falls
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Fair Housing Analysis

This report, an update to the City of Sioux Falls Analysis of Impediments to Fair Housing Choice, supplements the City of Sioux Falls 2019-2023 Five-year Consolidated Plan.

An analysis of barriers to fair housing choice—and development of action items to address those barriers—is required of the City as a condition of receiving federal housing and community development block grant funds. The overall goal of this report is to demonstrate how the City can take actions to Affirmatively Further Fair Housing Choice (AFFH), expanding housing choice for all residents and workers in Sioux Falls.

As a federal entitlement community, the City of Sioux Falls has specific fair housing planning responsibilities:
- Conducting an Analysis of Impediments to Fair Housing Choice;
- Developing actions to overcome the effects of identified impediments to fair housing; and
- Maintaining records to support the City’s initiatives to affirmatively further fair housing.

This report covers the HUD-recommended analysis in the Fair Housing Guide and incorporates maps and tables from HUD’s Affirmatively Furthering Fair Housing mapping and data tool (AFFH-T). The data used represent a combination of Census data, the Comprehensive Housing Affordability Strategy (CHAS) database, and the Sioux Falls Consolidated Plan Stakeholder Survey, which was completed as part of the Consolidated Plan. The following fair housing topics are analyzed for the City of Sioux Falls:
- Demographic Summary;
- Segregation/Integration;
- Disparities in Access to Opportunity;
- Disproportionate Housing Needs;
- Publicly Supported Housing Analysis;
- Disability and Access Analysis;
- Fair Housing Enforcement, Outreach Capacity, and Resources Analysis; and
- Fair Housing Challenges and Action Plan.

Demographic Summary

As of 2017, Sioux Fall’s population was 170,401, 35 percent higher than in 2000 (or an increase of 44,330 residents). By comparison, the State of South Dakota grew by 13 percent between
2000 and 2017. Sioux Falls is the largest city in South Dakota, by a wide margin—the second largest city is Rapid City with 75,443 people.¹

The City’s growth is closely related to its strong labor market. The Minneapolis Federal Reserve’s December 2018 Fedgazette calls Sioux Falls the “state’s engine for job growth” and relates the City’s economic health to its ability to accommodate a growing labor force.² Although this growth has boosted many facets of the City’s economy, it has also led to growing demand for housing.

In terms of race and ethnicity, the City of Sioux Falls has historically been predominately White, non-Hispanic; though resident diversity has increased in recent years. Between 2000 and 2017, Sioux Falls saw a 22 percent increase in its non-Hispanic white population compared to a 169 percent increase in non-white residents. Even so, non-Hispanic white residents account for 82 percent of the total population.

Among individual minority groups, the highest growth was for black, non-Hispanic residents (increasing by 214% between 2000 and 2017) and Hispanic residents (increasing by 178% between 2000 and 2017). Each of these groups accounted for 5 percent of the Sioux Falls population in 2017. Asian and Native American residents collectively account for another 4 percent of the population.

Along with an increase in racial/ethnic diversity, Sioux Falls’ experienced growth in residents who are born outside of the U.S. (growth of 6,756 residents from 2000) and residents with Limited English Proficiency (growth of 3,022 resident from 2000).³

The age profile of Sioux Falls has not shifted substantially from 2000. Children account for about one-quarter of the total population and seniors account for about half that (12%). Nearly two-thirds of the population are between the ages of 18 and 64, generally key workforce aged residents.

Figure 1, from HUD’s Affirmatively Furthering Fair Housing data tool (AFFH-T), summarizes the demographic changes Sioux Falls has experienced since 1990.

¹ 2000 Census and 2017 1-year American Community Survey (ACS)
³ Limited English Proficient means “speaks English less than very well” (self reported).
Figure 1.
Demographic Trends, City of Sioux Falls, 1990-2017

<table>
<thead>
<tr>
<th></th>
<th>1990</th>
<th>2000</th>
<th>2010</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>104,677</td>
<td>126,071</td>
<td>153,967</td>
<td>170,401</td>
</tr>
<tr>
<td></td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Race/Ethnicity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>101,151</td>
<td>114,818</td>
<td>130,804</td>
<td>140,080</td>
</tr>
<tr>
<td></td>
<td>97%</td>
<td>91%</td>
<td>85%</td>
<td>82%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>710</td>
<td>2,866</td>
<td>7,891</td>
<td>9,006</td>
</tr>
<tr>
<td></td>
<td>1%</td>
<td>2%</td>
<td>5%</td>
<td>5%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>575</td>
<td>3,077</td>
<td>6,785</td>
<td>8,545</td>
</tr>
<tr>
<td></td>
<td>1%</td>
<td>2%</td>
<td>4%</td>
<td>5%</td>
</tr>
<tr>
<td>Asian or Pacific Isl.,</td>
<td>649</td>
<td>1,875</td>
<td>3,369</td>
<td>3,899</td>
</tr>
<tr>
<td>Non-Hispanic</td>
<td>1%</td>
<td>1%</td>
<td>2%</td>
<td>2%</td>
</tr>
<tr>
<td>Native American,</td>
<td>1,544</td>
<td>3,052</td>
<td>4,905</td>
<td>4,023</td>
</tr>
<tr>
<td>Non-Hispanic</td>
<td>1%</td>
<td>2%</td>
<td>3%</td>
<td>2%</td>
</tr>
<tr>
<td>National Origin</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foreign-born</td>
<td>1,716</td>
<td>5,736</td>
<td>9,097</td>
<td>12,492</td>
</tr>
<tr>
<td></td>
<td>2%</td>
<td>5%</td>
<td>6%</td>
<td>7%</td>
</tr>
<tr>
<td>LEP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Limited English</td>
<td>1,275</td>
<td>4,043</td>
<td>6,204</td>
<td>7,065</td>
</tr>
<tr>
<td>Proficiency</td>
<td>1%</td>
<td>3%</td>
<td>4%</td>
<td>4%</td>
</tr>
<tr>
<td>Sex</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>50,100</td>
<td>62,165</td>
<td>76,333</td>
<td>84,964</td>
</tr>
<tr>
<td></td>
<td>48%</td>
<td>49%</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>Female</td>
<td>54,577</td>
<td>63,906</td>
<td>77,634</td>
<td>85,437</td>
</tr>
<tr>
<td></td>
<td>52%</td>
<td>51%</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>Age</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under 18</td>
<td>27,342</td>
<td>32,879</td>
<td>37,848</td>
<td>42,554</td>
</tr>
<tr>
<td></td>
<td>26%</td>
<td>26%</td>
<td>25%</td>
<td>25%</td>
</tr>
<tr>
<td>18-64</td>
<td>65,317</td>
<td>79,364</td>
<td>99,212</td>
<td>107,479</td>
</tr>
<tr>
<td></td>
<td>62%</td>
<td>63%</td>
<td>64%</td>
<td>63%</td>
</tr>
<tr>
<td>65+</td>
<td>12,019</td>
<td>13,828</td>
<td>16,907</td>
<td>20,368</td>
</tr>
<tr>
<td></td>
<td>11%</td>
<td>11%</td>
<td>11%</td>
<td>12%</td>
</tr>
<tr>
<td>Family Type</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Families with children</td>
<td>14,278</td>
<td>11,366</td>
<td>18,400</td>
<td>20,236</td>
</tr>
<tr>
<td></td>
<td>53%</td>
<td>50%</td>
<td>49%</td>
<td>49%</td>
</tr>
</tbody>
</table>

Note: Percentages reflect percent of total population for all metrics except Family Type which reflects percent of total families.
Source: HUD AFFHT Table 2 and 2017 5-year ACS.

Segregation/Integration

The Dissimilarity Index, or DI, is a common tool that measures segregation in a community. Specifically, the DI is an index that measures the degree to which two distinct groups are evenly distributed across a geographic area. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. DI values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

Figure 2, from the AFFH template, shows the DI for Sioux Falls in 1990, 2000, 2010, and 2013. The table at the top shows the DI values and the line graph illustrates the trends between 1990 and 2013.

The highest level of segregation, based on the DI, is between Black and White residents; segregation is Moderate. Segregation between these two groups increased significantly
between 1990 and 2013. Segregation also increased significantly between Hispanic and White residents yet remains in the Low-to-Moderate range. In contrast, segregation between Asian and White residents is Low and remained Low between 1990 and 2013.

Figure 2.
Trends in Segregation as Measured by the Dissimilarity Index, Sioux Falls, 1990-2013

<table>
<thead>
<tr>
<th></th>
<th>1990</th>
<th>2000</th>
<th>2010</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-White/White</td>
<td>29</td>
<td>31</td>
<td>31</td>
<td>36</td>
</tr>
<tr>
<td>Black/White</td>
<td>32</td>
<td>31</td>
<td>35</td>
<td>44</td>
</tr>
<tr>
<td>Hispanic/White</td>
<td>24</td>
<td>37</td>
<td>34</td>
<td>37</td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td>23</td>
<td>21</td>
<td>19</td>
<td>26</td>
</tr>
</tbody>
</table>

Source: HUD AFFH-T.

It is important to note that the index does not indicate spatial patterns of segregation, just the relative degree of segregation. The following maps demonstrate those geographic patterns.

Patterns of segregation. Figures 3 through 5 compare racial and ethnic distribution patterns in Sioux Falls in 1990, 2000, and 2010. It is important to note that all the maps are set to the same dot scale (1 dot = 15 people) to allow an equal comparison among racial and ethnic categories. A comparison of the maps reveals that:

■ There has been a steady increase in minority populations in Sioux Falls since 1990.

■ The City’s Black, non-Hispanic and Native American, non-Hispanic residents have historically and consistently resided in the central and east central part of Sioux Falls. Many still reside in this part of the City, although the City’s minority residents live throughout the City.

■ Most Hispanic residents reside in central and east central part of Sioux Falls; however, Hispanics are the most dispersed minority population, also living in the west part of the City.
Figure 3. Distribution of Sioux Falls Residents by Race/Ethnicity, 1990

Source: HUD AFFH-T Map2.

1 Dot = 15 People
- Black, Non-Hispanic
- Native Am. Non-Hispanic
- Asian/Pac. Isl. Non-Hispanic
- Hispanic

Figure 4. Distribution of Sioux Falls Residents by Race/Ethnicity, 2000

Source: HUD AFFH-T Map2.

1 Dot = 15 People
- Black, Non-Hispanic
- Native Am. Non-Hispanic
- Asian/Pac. Isl. Non-Hispanic
- Hispanic
The next set of maps shows the spatial distribution of residents by National Origin and Limited English Proficiency, respectively, in 2010. The top five national origins of Sioux Falls residents born outside of the United States are Mexico, Sudan, Ethiopia, Guatemala and El Salvador.

According to the maps, Sioux Falls residents from Mexico and Ethiopia are relatively dispersed across the City with a higher concentration of Sudanese in central Sioux Falls and El Salvadorians living in the northeast. This may be related to cultural preferences in location, as well as availability of housing to accommodate residents’ affordability and household needs.

Not surprisingly, the Limited English Proficiency map shows patterns that align with the languages spoken by the resident’s national origin.
Figure 6.
Distribution of Sioux Falls Residents by National Origin, 2010

Source: HUD AFFH-T Map 3.

1 Dot = 5 People
- Mexico
- Sudan
- Ethiopia
- Guatemala
- El Salvador

Figure 7.
Distribution of Limited English Proficient Residents, 2010

Source: HUD AFFH-T Map 4.

1 Dot = 5 People
- Spanish
- African
- Vietnamese
- Serbo-Croatian
- Other Indic Language
Tenure and segregation. Limiting the ability of certain residents to own homes—particularly in fast-growing and high-demand markets—prevents wealth creation and widens economic gaps. These limitations also prevent residents from accessing neighborhoods with high quality schools and other community amenities (e.g., recreational facilities and parks), because these are often funded by builders and homeowners’ associations as part of master development agreements and/or fees paid by owners.

The maps below show the location of renters (Figure 8) and owners (Figure 9) in Sioux Falls. The areas with the highest rental rates—and, inversely, lowest ownership rates—are some of the same areas with clusters of non-White and Hispanic populations.

Figure 8.
Housing Tenure – Renters, City of Sioux Falls, 2010

Source: HUD AFFH-T Map 16.
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). A Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) is a neighborhood with a poverty rate of 40 percent (or three times the region proportion) and a racial and ethnic concentration. Concentrations are defined as a non-White and Hispanic proportion of more than 50 percent in urban areas and 20 percent in rural areas.

It is important to note that R/ECAPs are not areas of focus because of racial and ethnic concentrations alone. This study recognizes that racial and ethnic clusters can be a part of fair housing choice if they occur in a non-discriminatory market. Rather, R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

According to HUD, there are no R/ECAPs in the City of Sioux Falls or in the greater region. This is good news and indicates that no racial or ethnic group is highly concentrated in areas with higher rates of poverty.

Sioux Falls does not have areas where poverty is highly concentrated—but there are areas where poverty is relatively high. These are shown in Figure 10. Dark grey indicates low poverty neighborhoods; light grey indicates high poverty neighborhoods. The map also shows where residents of different races and ethnicities live. In sum, the City’s minority residents are
more likely to live in high poverty, rather than low poverty, neighborhoods. The City’s lowest poverty neighborhoods are located almost exclusively in the southern part of the City. Minority populations are more likely to live in Central Sioux Falls.

Figure 10.  
Race/Ethnicity and Poverty, 2010

Source: HUD AFFH-T Map 12.

Disparities in Access to Opportunity

The Access to Opportunity framework in the AFH expands the fair housing analysis beyond housing. This segment of the AFH examines community needs, such as access to quality education, employment, and transportation. It draws from data and maps provided by HUD and findings from the community engagement process.

Economic opportunity and fair housing overview. The Federal Fair Housing Act recommends that HUD programs and activities be administrated in a manner that affirmatively furthers the policies of the Fair Housing Act. Federal courts have interpreted this to mean doing more than simply not discriminating: AFFH also recommends recipients of federal housing funds to take meaningful actions to overcome historic and current barriers to accessing housing and economically stable communities.
Recent research has demonstrated that fair housing planning has benefits beyond complying with federal funding obligations:

- Dr. Raj Chetty’s well known Equality of Opportunity research found economic gains for adults who moved out of high poverty neighborhoods when they were children. The gains were larger the younger the children were.\(^4\)

- A companion study on social mobility isolated the neighborhood factors that led to positive economic mobility for children: lower levels of segregation, lower levels of income inequality, high quality education, greater community involvement (“social capital”), greater family stability.

- A 2016 study by the National Bureau of Economic Research (NBER) found positive economic and social outcomes for children raised in publicly subsidized housing, regardless of the poverty level of the neighborhood.\(^5\)

This has been articulated by HUD as: “the obligations and principles embodied in the concept of fair housing are fundamental to healthy communities…and…actions in the overall community planning and development process lead to substantial positive change.”

**Differences in Access to Opportunity.** To facilitate the Assess to Opportunity analysis, HUD provides a table that measures access to opportunity by various indices related to poverty, school quality, labor market and jobs, transit, transportation cost, and environmental health. These indices allow comparison of opportunity indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and to the region.

Figure 11 illustrates the opportunity indicators for Sioux Falls by race/ethnicity. The top graphic shows indices for all households and the bottom graphic shows the indices just for households living in poverty. The values shown in Figure 11 are referenced in the opportunity indicators discussions that follow.

To interpret the indices in the figure, use the rule that a higher number is always a better outcome. The index should not be thought of as a percentage—but as an “opportunity score.”

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Figure 11.
Opportunity Indicators by Race/Ethnicity, Sioux Falls

Note: Refer to the AHHF-T Data Documentation for details (www.hudexchange.info).

Source: HUD AFFH-T from Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.
The differences in opportunity index values between all households and those living in poverty are modest, suggesting that below-poverty residents do not face major barriers to opportunity amenities.

Disparities in access to opportunity by race/ethnicity are evident when comparing all households and when comparing income-similar households who are living in poverty:

- Non-Hispanic white and Asian residents have higher access to low poverty areas, quality schools, labor market engagement and environmental health than other racial/ethnic minority groups.

- Disparities in transit use and low transportation costs are minimal.

- Native American and African American residents live in close proximity to jobs (high value of jobs proximity index) but may not be qualified for those jobs (low labor market index value).

**Access to Low Poverty Neighborhoods.** Figure 12 shows the Low Poverty Index, which is simply a measure of the poverty rate. A higher value indicates a higher likelihood that a resident lives in a low poverty neighborhood.

**Figure 12.**
Low Poverty Index and Race/Ethnicity, City of Sioux Falls, 2010

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool – Map 7 (https://egis.hud.gov/affht/).
The areas with a high poverty rate (lighter shading) are located in the northern and central portions of the city and overlap with the Census tracts that have a high proportion of non-white residents.

**Access to proficient schools.** Figure 13 shows access to proficient schools for children of different races and ethnicities. The darker gray areas are those areas with better school proficiency and the lighter areas have lower school proficiency. As the figure indicates, there are better schools outside the City of Sioux Falls. Additionally, Black, Native American and Asian children—largely clustered in central neighborhoods in Sioux Falls—have low to moderate access to high proficiency schools. In comparison, the Census tracts with the highest access to high proficiency school have a large proportion of White, non-Hispanic residents.

**Figure 13.**
School Proficiency Index and Race/Ethnicity, City of Sioux Falls, 2010

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool – Map 7 ([https://egis.hud.gov/affht](https://egis.hud.gov/affht)).

**Access to Employment.** The employment opportunities analysis examines disparities that may exist in access to jobs and labor markets using both the Job Proximity Index and the Labor Market Engagement Index.

The Job Proximity Index measures the physical distance between place of residence and jobs. Values are percentile ranked with values ranging from 0-100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood. The index also
takes into consideration the relative competition for those jobs based on the population living near jobs.

As shown in Figure 14, access to jobs is highest in the central city, in north central Sioux Falls, as well as in some south central neighborhoods. The majority of businesses located in and around the City center, coincides with the majority of minority populations living in or near the City center, with the exception of many Black/Non-Hispanic populations living in neighborhoods with low access to employment (0-50 index range).

**Figure 14.**  
**Job Proximity Index and Race/Ethnicity, City of Sioux Falls, 2010**

![Image: Job Proximity Index and Race/Ethnicity, City of Sioux Falls, 2010](https://egis.hud.gov/affht/)

The Demographics and Labor Market Index measures unemployment rate, labor force participation rate, and percent of population age 25 and above with at least a bachelor’s degree, by Census tract. In other words, this index provides a measure of the human capital or capacity to engage with the labor market in a given neighborhood. The darker gray areas are those areas with greater labor market engagement and the lighter gray areas have lower labor market engagement.

As shown in Figure 15, there is generally greater labor market engagement in the outskirts of the city and less labor market engagement in the city center. When analyzed in conjunction with the race/ethnicity dot density map, non-Hispanic white residents are more likely to live in the
areas with better labor market and minority residents disproportionately live in the areas with less labor market engagement.

**Figure 15.**
**Labor Market Index and Race/Ethnicity, 2010**

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool – Map 9 (https://egis.hud.gov/affht/).

**Access to Transportation.** Transportation is identified in the City of Sioux Falls Stakeholder Survey 2019 as a barrier in a series of questions about resident access to economic opportunity. The vast majority of survey participants (81%), say that ‘insufficient availability of public transportation’ is a serious or very serious fair housing issue or contributing factor (based on survey response rates at 6 or greater on a seriousness scale from 1 to 9).

Furthermore, additional data from the City of Sioux Falls Stakeholder Survey 2019, suggest that 52 percent of respondents shared that lack of availability of public transportation near affordable housing, is a very serious fair housing issue or contributing factor.

HUD’s transit index shows relatively low but relative equitable access to transit opportunities (see Figure 11). However, residents who depend on transit—those with low incomes and those with disabilities—are disproportionately impacted when transit service is inadequate.

Figure 16 shows the transit route map for Sioux Falls. Service hours are Monday through Friday 5:45am to 7:45 pm and Saturdays 7:45am to 6:45pm. There is no service offered on Sundays.
The 2012 AI identified inadequate public transportation as a major impediment in Sioux Falls due to lack of sufficient funding, limited weekend service, and lack of service to locations of key employers. The same challenges remain today.

HUD also provides opportunity index data on transportation cost by neighborhood in Sioux Falls. As shown in Figure 17, transportation cost are fairly equitable across the city and do not appear to have a disproportionately negative impact on racial/ethnic minority groups.
Language access. Language can pose a barrier to accessing opportunity and city services for limited English proficient (LEP) residents if there are not language access procedures in place. Indeed, the 2012 AI identified the city’s lack of a Language Access Plan as a fair housing impediment. The City addressed that concern by conducting a four-factor analysis and approving a Language Access Plan in 2013.

Figure 18 shows the number and proportion of Sioux Falls residents by the language spoken in their home and their ability to speak English. In total there are 7,065 LEP residents in Sioux Falls (residents that speak English “less than very well.”) — about 4.5 percent of the total population. These residents speak a variety of languages — about one-third of LEP residents speak Spanish, 24 percent speak other Indo-European languages, 15 percent speak Asian and Pacific Island languages, and 28 percent speak other languages.
Stakeholder perspective on access to opportunity. Stakeholders who represent the interests of low and moderate income populations and who participated in the survey for the Consolidated Plan and AI were asked about the community needs of residents in Sioux Falls.

As shown in Figure 19, the top five greatest unmet community needs, according to the Sioux Falls Consolidated Plan Stakeholder Survey 2019, include:

- Access to reliable and affordable public transportation (69% of respondents);
- Mental health services (64% of respondents);
- Affordable childcare (52% of respondents);
- Support services for low-income residents (48% of respondents), including access to affordable housing and rental assistance; and
- Job training (36% of respondents).

Survey respondents noted that the greatest unmet community development needs are most prevalent in low-income and immigrant communities. Geographically, stakeholders identified downtown, just outside downtown (approximately one-mile radius), Whittier, Pettigrew, and neighborhoods with public transportation routes as recommended priority focus areas.
Figure 19.
Greatest unmet community development needs in Sioux Falls

- Access to reliable and affordable public transportation: 69%
- Mental health services: 64%
- Affordable child care: 52%
- Support services for low income residents: 48%
- Job training programs: 36%
- Neighborhood improvement: 31%
- Assistance for non-profits in identifying loan/grant opportunities: 29%
- Food pantries: 19%
- Access to Internet for low income residents: 17%
- Senior center/senior services: 14%
- Accessibility (ADA) improvements to community amenities: 10%
- Flood plain or other environmental hazard mitigation: 7%
- Sidewalks: 7%
- Accessibility (ADA) improvements to public buildings: 5%
- Infrastructure for high speed/broadband internet access: 5%
- Do not know: 2%
- Parks in certain neighborhoods: 2%
- Street lighting: 2%

Note: n=42.

The stakeholder survey also asked about fair housing challenges in the city, including those related to access to opportunity. Survey respondents were asked on a scale from 0 to 9, where 0 is “Not a Fair Housing Issue or Contributing Factor” and 9 is “A Very Serious Fair Housing
Issue or Contributing Factor”, to rank the level of seriousness on a variety of access to opportunity indicators.

Transportation was identified as a key barrier to economic opportunity: The vast majority of survey participants (81%), say that ‘insufficient availability of public transportation is a serious or very serious fair housing issue or contributing factor.

Seventy-two percent of survey participants state that deteriorated and abandoned vacant properties concentrated in certain areas in Sioux Falls is a serious or very serious fair housing issue or contributing factor (based on survey response rates at 6 or greater on a seriousness scale from 1 to 9).⁶

Disproportionate Housing Needs

This section supports an important component of fair housing planning: to assess if any groups of persons, based on race, color, religion, national origin, sex, familial status, or disability, experience greater housing needs when compared to other populations in the jurisdiction. An assessment of cost burden, severe cost burden, overcrowding, and substandard housing, for example, helps set goal and priorities, and develop strategies to address barriers to fair housing choice.

The AFH defines “disproportionate housing needs” as a “condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of members of any other relevant groups of the total population experiencing that category of housing needs in the applicable geographical area.”

Sioux Falls housing needs overview. Top housing needs in Sioux Falls include affordable rental housing, accessible housing for people with special needs, and ownership opportunities for low- and moderate-income renters who would like to buy homes. Cost burden and severe cost burden are the most common housing problems Sioux Falls.

Low to moderate to income households and residents belonging to a racial/ethnic minority—including Asian, Hispanic, African American and American Indian, Alaska Native—are more likely to be affected by housing problems than higher income and non-Hispanic White households.

People experiencing homelessness in Sioux Falls. The Sioux Falls Housing for the Homeless Consortium January 2019 Point in Time (PIT) count identified 334 persons experiencing homelessness in Sioux Falls. Nearly one-third were newly homeless, with 28 persons identifying as chronically homeless. Among those counted in the PIT, the following

⁶ For additional detail see Appendix A Sioux Falls Survey Results Summary
conditions were most common: challenges with mental health (12%), currently fleeing domestic violence (12%), and challenges with substance abuse (8%).

**Non-homeless special needs.** Non-homeless special needs populations include households containing persons with a disability, elderly households, large families, female headed households with children, limited English proficient households, and those at risk of homelessness. For non-homeless populations, survey participants overwhelmingly advise Sioux Falls to maintain, create, grow, and support affordable housing options.

Additionally, survey respondents suggest addressing barriers to housing, increasing funds for housing and investing in infrastructure improvements, predominantly in expanding routes and times for public transportation. A long-term strategic plan approach that involves residential feedback, in collaboration with the public and private sector, was recommended throughout most responses.

**Housing problems by race and ethnicity.** Disproportionate housing needs in a population are defined as having one or more of the following four housing problems in greater proportion than the jurisdiction as a whole or than whites:

1) Living in housing that lacks complete kitchen facilities;

2) Living in housing that lacks complete plumbing facilities;

3) More than one person per room (overcrowded); and

4) Cost burden greater than 30 percent of Area Median Income (AMI).

Figure 20 shows the proportion of residents by income and by race/ethnicity that have one of the four housing problems outlined above. In general, households with lower incomes are more likely to experience housing problems than those with higher incomes.

Among all low- and moderate-income households (those earning less than 100% AMI), African American and Native American householders are disproportionately more likely than non-Hispanic white households to experience housing problems.
Figure 20.
Housing Problems by Income and Race/Ethnicity, Sioux Falls

**Cost burden and severe cost burden.** Cost burden and severe cost burden, for both renter and owner households, are the most common housing problems in Sioux Falls. According to the 2011-2015 CHAS data, 4,605 low to moderate income renter households experience cost burden (22%) and another 4,195 low to moderate income rental households experience severe cost burden (20%). Among owner households, a lower number but similar proportion (3,765 or 24%) are cost burdened and 1,780 or 11 percent are severely cost burdened.

Those households who are most affected by housing problems, especially cost burden, include:

- Renters earning 0-30 percent AMI—59% experience severe cost burden.
- Owners earning 0-30 percent AMI—55% experience severe cost burden.
- Renters earning 30-50 percent AMI—50% experience cost burden.
- Elderly owners on a fixed income earning 0-30 percent AMI represent 67% of those owners experiencing cost burden.
- Elderly renters on a fixed income earning 50-80 percent AMI represent 76% of those renters experiencing severe cost burden.

<table>
<thead>
<tr>
<th>Households by AMI</th>
<th>Has 1 or more of 4 housing problems</th>
<th>Has none of the 4 housing problems</th>
<th>Household has no income, but none of the other housing problems</th>
<th>Percent with 1 or more of the 4 housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-30% AMI</td>
<td>5,895</td>
<td>1,225</td>
<td>510</td>
<td>77%</td>
</tr>
<tr>
<td>30-50% AMI</td>
<td>4,825</td>
<td>2,845</td>
<td>0</td>
<td>63%</td>
</tr>
<tr>
<td>50-80% AMI</td>
<td>4,170</td>
<td>9,475</td>
<td>0</td>
<td>31%</td>
</tr>
<tr>
<td>80-100% AMI</td>
<td>880</td>
<td>6,345</td>
<td>0</td>
<td>12%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Households earning 0-100% AMI by Race/Ethnicity</th>
<th>Has 1 or more of 4 housing problems</th>
<th>Has none of the 4 housing problems</th>
<th>Household has no income, but none of the other housing problems</th>
<th>Percent with 1 or more of the 4 housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>15,770</td>
<td>19,890</td>
<td>510</td>
<td>44%</td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>12,900</td>
<td>17,060</td>
<td>510</td>
<td>42%</td>
</tr>
<tr>
<td>Black / African American</td>
<td>1,149</td>
<td>950</td>
<td>0</td>
<td>55%</td>
</tr>
<tr>
<td>Asian</td>
<td>179</td>
<td>319</td>
<td>0</td>
<td>36%</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>660</td>
<td>325</td>
<td>0</td>
<td>67%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>620</td>
<td>810</td>
<td>0</td>
<td>43%</td>
</tr>
</tbody>
</table>

Renter households are also more likely to be living in overcrowded conditions than homeownership households. Crowding is particularly prevalent in single family households. Of the 805 low to moderate income renters facing crowding problems, 86 percent are single family households.

Cost burden is disproportionately experienced by residents of diverse races. The residents who experience the highest rates of cost burden include American Indians, African Americans and Asian Americans.

Figure 21 below shows the neighborhoods with the highest housing burdens and their relation to households of different races and ethnicities. In general, housing burden is moderate to high in Sioux Falls. The highest rates of housing burden exist in the central Census tracts, where there are the higher clusters of minority residents.

Figure 21.
Housing Problems, City of Sioux Falls, 2010

The National Low Income Housing Coalition (NLIHC) produces an annual report on the wages required to afford a modest apartment in different metro areas and states across the country. In 2019 NLIHC reported that in Sioux Falls workers need to earn $16.79 per hour in order to afford
a modest two-bedroom apartment. Sioux Falls workers earning minimum wage would have to work 74 hours per week to afford a modest two-bedroom apartment.\textsuperscript{7}

**Housing condition.** Per the City of Sioux Falls Stakeholder Survey 2019, nearly 70 percent of respondents share that affordable housing that is in poor condition is a very serious fair housing issue or contributing factor. Nearly one-third of respondents also rate loss of low-cost or market rate affordable housing due to revitalization, commercialization, urban renewal, or rapid economic growth in Sioux Falls as a very serious fair housing issue. Conversely, of 30 respondents, 17 participants (nearly 60%) stated that the loss of manufactured housing (or mobile home) communities to redevelopment was not a fair housing issue or contributing factor (based on survey response rates at 5 or less on a seriousness scale from 1 to 9).

Many survey respondents recommend creating incentives and implementing regulations for landlords and suggest improving the standards for deteriorating housing stock to help Sioux Falls address fair housing issues and factors.

**Homeownership.** Figure 22 shows homeownership rates by race and ethnicity for Sioux Falls. Non-Hispanic white residents have the highest homeownership rates in the city (65%) though Asian residents are close behind (58% ownership). Black residents and Native American residents have significantly lower ownership rates than other racial/ethnic groups—fewer than one in five households in these minority groups are home owners. These disparities are similar to ownership differences identified in the 2012 AI.

**Figure 22.**
**Homeownership by Race/Ethnicity**

\begin{itemize}
  \item All Householders: 61%
  \item Non-Hispanic white: 65%
  \item Asian: 58%
  \item Hispanic: 43%
  \item African American: 17%
  \item Native American: 13%
\end{itemize}

Source: 2017 5-year ACS.

**Disparities in mortgage lending.** This section uses an analysis of Home Mortgage Disclosure Act data (HMDA) to identify areas of private disinvestment in the Sioux Falls Metro Area and the households most affected by lack of capital.

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\textsuperscript{7} National Low Income Housing Coalition Out of Reach 2019 Report: https://reports.nlhhc.org/oor/south-dakota
HMDA data are widely used to examine potential discrimination in mortgage lending. Financial institutions have been required to report HMDA data since the 1970s, when civil rights laws prompted higher scrutiny of lending activity. The variables contained in the HMDA dataset have expanded over time, allowing for more comprehensive analyses and better results. However, despite expansions in the data reported, public HMDA data remain limited because of the information that is not reported. As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities, genders, and location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Violations of fair lending, practices, however, generally originate with federal regulators who have access to a broader set of information (e.g., borrower loan files) of lending practices.

This section uses the analysis of HMDA data to determine if disparities in loan approvals and terms exist for loan applicants of different races and ethnicities. The HMDA data analyzed in this section reflect loans applied for by residents of the Sioux Falls Metro in 2015, 2016, and 2017. A three-year period is used so that there are sufficient data to analyze by race/ethnicity.

**Loan applications and outcomes.** In 2015-17, there were about 31,700 loan applications made in the Sioux Falls metro for owner-occupied homes. Just over half (52%) were for home purchases, 45 percent were for refinances, and 4 percent were home improvement applications.

Overall, 72 percent of the applications resulted in originated loans. Another 7 percent were approved but not accepted and 11 percent of applications were either withdrawn by applicants or closed for incompleteness. The remainder were denied by the financial institution.

The most common reasons for denial were credit history (31%), debt-to-income ratio (26%) and collateral (15%).

**Denial rate by race/ethnicity.** Figure 23 shows denial rates by race/ethnicity for all loan applications.\(^8\) Denial rates were highest for African American and Native American applicants (both 23%)—much higher than the denial rate for non-Hispanic white applicants (11%). These disparities are similar to those identified in the 2012 AI.

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\(^8\) The “denial rate” is defined as the number of denied loan applications divided by the total number of applications excluding withdrawn applications and application files closed for incompleteness.
There are many reasons why denial rates may be higher for certain racial and ethnic groups. First, overall denial rates for some racial and ethnic groups may skew towards lower income households, since some minority groups typically have lower incomes. Figure 24 examines differences in loan origination and denial rates by income range. Loan applicants were grouped into one of three income ranges:

- Applicants earning less than 80 percent of the HUD Area Median Income (AMI) at the time—about $59,000 or less;
- Applicants earning between 80 and 120 percent AMI—about $59,000 and $89,000; and
- Applicants earning greater than 120 percent AMI—about $89,000 and more.

As shown by Figure 24, the disparity in denial rates persists for Hispanic, African American, and Native American applicants, even at higher incomes.
Second, loan denial rates can also vary by race and ethnicity based on the type of loans applied for by applicants. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution.

Figure 25 displays the denial rate by race and ethnicity and loan purpose. Denial rates for home purchases are low across racial and ethnic groups but are highest for African Americans and Native Americans. All minority groups experience higher rates of denial for refinancing applications than non-Hispanic whites.

**Figure 25.**
Denial Rate by Race/Ethnicity and Loan Purpose, Sioux Falls Metro, 2015-2017

Subprime by race/ethnicity. Among applicants whose loans were originated, racial/ethnic disparities can still exist in the form of subprime loans (those with disproportionately high interest rates). Figure 26 shows subprime loans as a percent of all originated loans by race/ethnicity in the Sioux Falls Metro. Hispanic and Native American borrows have the highest incidence of subprime loans.

**Figure 26.**
Subprime Loans by Race/Ethnicity, Sioux Falls Metro, 2015-2017

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9 For the purposes of this section, “subprime” is defined as a loan with an APR of more than three percentage points above comparable Treasuries, a definition consistent with the intent of the Federal Reserve in defining “subprime” in the HMDA data.
Zoning and land use. The key land use and zoning issues evaluated in the 2012 AI were residential zoning districts (and permitted dwelling types), the definition of family, and regulations for group homes. These topics are in line with HUD’s Fair Housing Planning Guide which focuses the review on diversity of housing choice (allowance of various housing types) and policies that may impact housing choice for people with disabilities. The same topics are reviewed here under the City’s current code, the “2013 Shape Places Zoning Ordinance of the City of Sioux Falls.”

- Residential zoning districts and dwelling types. The City of Sioux Falls’ code does have districts with exclusively single family forms (RR, RS, and RT-1) but also has a number of residential districts that allow for gentle density (town homes, duplexes, etc.) and higher density (multifamily development. Overall, the code is inclusive of a variety of housing types.

- Definition of family. The code does include some occupancy restrictions (no more than three unrelated adults) but makes an exception for people with disabilities (no more than seven). The code defines “handicapped” by referencing the Fair Housing Act. Sioux Falls definition of family does not appear to be a barrier to fair housing choice.

- Groups homes. Per the definition of family, above, group homes with fewer than eight residents are allowed by right in residential districts. Group homes with more than eight residents, called community residential homes” in the code, are facilities with eight or more individuals that are “handicapped” as defined in the Fair Housing Act. Community residential homes fall under the “neighborhood residential facilities” form and are allowed in the following districts as a principal use: RD-2, RT-2, RA-1, RA-2, RA-3, O, S-1, S-2, LW, and PO-PUD districts.

Publicly Supported Housing Analysis

The AFH defines the term “publicly supported housing” as housing assisted with funding through federal, State, or local agencies or programs as well as housing that is financed or administered by or through any such agencies or programs.

According to HUD, the latest inventory of publicly supported housing in the City of Sioux Falls is 1,177 public housing units (including public housing, project-based Section 8, and Other Multifamily) and 1,881 housing choice vouchers. The city also has 71 Low Income Housing Tax Credit developments that supply 2,841 income-restricted units (according to the HUD LIHTC database).

Representation of racial and ethnic groups by housing program. HUD provides data on the racial and ethnic makeup of households assisted by housing authorities; these are shown below in Figure 27. (These data do not include LIHTC units). The figure also includes the distribution of households by race/ethnicity by various income levels to allow for comparison of those who are likely to qualify for publicly supported housing and those who are actually occupying publicly supported housing.
The racial/ethnic distribution of publicly supported housing in Sioux Falls is 82 percent non-Hispanic white, 14 percent Black or African American, 2 percent Hispanic, and 1 percent Asian. This distribution differs slightly from the income-qualified population which indicates that African Americans are slightly over represented in publicly assisted housing while Hispanic and non-Hispanic white households are underrepresented.

### Patterns in location by program

Figure 28 shows the distribution of publicly supported housing relative to where residents of different races and ethnicities live. The icons represent different types of publicly supported housing:

- Blue icons indicate housing that is owned and operated by a public housing authority;
- Orange icons represent affordable rental housing that offers Section 8 subsidies;
- Purple icons represent Low Income Housing Tax Credit (LIHTC) developments;
- Green icons show other types of publicly supported rental housing; and
- Grey shading shows the percentage of rental units that house Housing Choice Voucher holders.
Figure 28.  
PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY, CITY OF SIOUX FALLS, 2010

The majority of publicly supported developments are grouped together near the highest concentration of minority residents, central and east central in the City. Although this area contains many of the City’s subsidized housing developments, the percent of voucher units are ‘low to moderately low’ per the need. Vouchers holders tend to be on the outskirts of the City or outside the jurisdictional boundaries.

PHA policy review. The Sioux Falls Housing and Redevelopment Commission is the Public Housing Authority (PHA) serving low income households in the city. It administers public housing programs, housing choice vouchers and other services for low income households. As discussed in the 2012 AI, the Commission’s Admissions and Continued Occupancy Plan (ACOP) and reasonable accommodation procedures do not create impediments to fair housing choice.

Additional good practice that may help improve transparency and access to services for residents would be:

- Improve website to accommodate LEP residents (e.g., add “google translate” capability) and ensure that all information and documents related to application and eligibility are in Spanish and English;
- Utilize technology to better accommodate applications from persons with disabilities and families working traditional hours (e.g., online applications) and increase transparency (e.g., post PHA plans and other draft review documents online).

**Disability and Access Analysis**

This section analyzes individuals with disabilities in Sioux Falls with a focus on fair housing issues assessed in previous sections from the perspective of individuals with disabilities. While individuals with disabilities may experience the same fair housing issues as individuals without disabilities, they also may experience additional disability-related barriers that are distinct from the barriers experienced by individuals without disabilities.

**Persons with disabilities population overview.** More than 13,010 households in Sioux Falls have a disability (hearing or vision impairment, ambulatory limitation, cognitive limitation or self-care or independent living limitation).

Approximately 40 percent of households living with a disability have a housing need—equal to 5,151 households—based on the housing problems data provided by HUD (CHAS data). In the next five years, households with disabilities in need of housing assistance is projected to grow by 613 households, totaling 5,764 who will have needs.

Many people with disabilities have limited income and likely to be receiving social security disability payments. Those with mobility or physical disabilities have a need for accessibility modifications to housing and access to reliable, affordable public transportation.

Like most other cities in the United States, there is a large, growing population of elderly households (containing at least one person 62 years of age or older). In Sioux Falls, there are 16,900 elderly households. Of the 16,900 households, 27 percent have housing needs. Housing needs for the elderly are projected to grow by 541 households in the next 5 years.

Additional special needs populations in Sioux Falls include:

- 12,804 residents 18 years or older have a substance dependence addiction.
- 132 residents are living with HIV/AIDS.
- 16,619 residents are persons with a mental, physical, and/or developmental disability.
- 7,170 residents are victims of domestic violence (such as rape, physical violence, and/or stalking by an intimate partner).

**Availability of housing stock accessible to persons with disabilities.** As shown in the below, 11 out of 13 survey respondents (85%) who work directly with persons with disabilities mention that there is an insufficient number of housing units accessible for this population. Specifically, survey respondents shared that housing is particularly difficult to access for chronically homeless and those suffering from mental health...
and substance abuse. Family housing that is adaptable to physical disabilities, such as ramps for wheelchair accessibility or a housing unit without stairs, was also mentioned by multiple survey respondents as an important consideration.

**Figure 29.**
How would you characterize the availability of housing stock in the area you serve that is accessible to persons with disabilities?

Note: N=13.


**Availability of information.** Additionally, 12 out of the 13 survey respondents shared that it is difficult or very difficult for persons with disabilities to find information about grant or loan programs to make needed accessibility improvements/modifications to their homes.

**Figure 30.**
Availability of information about grant or loan programs for persons with disabilities

Note: N=13.


**Principal challenges faced by persons with disabilities.** Of the 12 survey respondents who answered the question on challenges faced by persons with disabilities, all agree that acquiring housing and remaining housed and accessing public transportation are the major challenges. Finding employment, living in the neighborhood of the persons with disabilities’ choice, accessing need services, and finding home health care also are expressed by survey respondents as major challenges.

- “Finding a place that is affordable, safe, accessible to support services, and accessible to transportation is a huge issue.”

- “Some of my tenants, nearly all of whom are disabled, struggle with housekeeping or other lifestyle choices that endanger their housing. Those individuals would greatly benefit from close, frequent, in-person monitoring and mentoring.”
It is important to note that, just like any household, not all persons with disabilities need or desire the same housing options. Fair housing analyses often focus on how zoning and land use regulations govern the siting of group homes. Although group homes should be an option for some persons with disabilities, other housing choices—particularly scattered site units—must be available to truly accommodate the variety of needs of residents with disabilities.

Figures 31-34 show where persons with disabilities reside in Sioux Falls. As the maps demonstrate, there is no distinct pattern to where people with disabilities live based on their age or disability type.

**Figure 31. Disability by Age**

Source: HUD AFFH-T Map 15.
Figure 32. Disability by Type: Ambulatory, Self-Care, and Independent Living Disabilities

Source: HUD AFFH-T Map 14.

Figure 33. Disability by Type: Hearing, Vision, and Cognitive Disabilities

Source: HUD AFFH-T Map 14.
Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

AFFH defines “fair housing enforcement and fair housing outreach capacity” to mean “the ability of a jurisdiction, to accept complaints of violations of fair housing laws, investigate such complaints, obtain remedies, engage in fair housing testing, and educate community members about fair housing laws and rights.”

Fair housing protections. Insufficient enforcement at the state level is most critical for residents who fall within protected classes covered by state, but not federal, law. These include residents who have a different sexual orientation, gender identity or expression, and ancestry than the majority.

South Dakota Division of Human Rights. The South Dakota Division of Human Rights (DHR) is located in Pierre and exists to address issues of human rights in the state of South Dakota. Specifically, the mission of the DHR is to promote equal opportunity through the administration and enforcement of the Human Relations Act of 1972. The Act was designed to protect the public from discrimination in regard to race, color, creed, religion, sex, disability, ancestry or national origin in relation to employment practices, labor union membership, education, public accommodations, public services, and also housing accommodations and property rights.

The Act also prohibits discriminating against someone who has filed a complaint with the Division of Human Rights, has testified on a matter before the Division or has assisted the Division in carrying out the purposes of the Act. This law also created the South Dakota Commission of Human Rights. The Commission is comprised of five members who are appointed by the governor with Senate confirmation for four-year terms. The Division of Human Rights addresses administration issues in relation to enforcement of the Human Relations Act, offers technical assistance, accepts fair housing complaints in relation to violations of the Act, investigates complaints that are filed with the agency, and also attempts to settle complaints that are filed through conciliatory efforts.10

Sioux Falls Human Relations Commission. Sioux Falls City Ordinance Chapter 21 1/2 prohibits discrimination on the basis of race, color, creed, religion, sex, national origin, ancestry, disability, or familial status. The ordinance applies only in the following areas: employment, housing, public services, public accommodations, financial institutions, insurance companies, labor organizations, and educational institutions. Religious organizations are exempt only as to religious qualifications for employment or residence in church-owned or operated property. The Commission enforces the law by investigating allegations of illegal discrimination. The role of the Commission investigation is one of being a neutral fact finder. The Sioux Falls Human Relations Commission has jurisdiction only within city limits. It may

10 EzineArticles.com/6467870
order compensatory damages, reasonable accommodations and modifications, affirmative action, hiring, reinstatement, promotion, posting of EEO notices, etc. The Commission will also provide technical assistance to employers or any organization interested in maintaining compliance with local and federal antidiscrimination laws. The Commission views as one of its major objectives to give each person and organization whatever assistance or guidance is necessary to increase public knowledge and understanding of the law, and to secure, where possible, voluntary compliance. The Disability Awareness Commission and the ADA Accessibility Review Board are two separate arms of the Human Relations Commission.

**Capacity, knowledge and resources issues.** Overwhelmingly, stakeholder survey participants report that lack of resources for housing agencies and organizations, including case management services and financial education and literacy, is a *serious or very serious* fair housing issue or contributing factor (based on survey response rates at 6 or greater on a seriousness scale from 1 to 9).

- Lack of case management for critical housing (81%)
- Lack of financial education and literacy (81%)
- Lack of case management for accessing housing resources (75%)
- Lack of case management for mental health (72%)
- Lack of resources for fair housing agencies and organizations (63%)

Survey participants expand on their concerns over lack of resources and share some recommended actions.

- “We need our current case managers and navigators EDUCATED and CONNECTED. And we need more case managers and navigators.”
- “A housing coordinator with REAL time vacancies that all landlords must use. Access for case managers to review this and point their clients/patients in the right direction.”
- “Need someone outside the city that teaches and keeps up on fair housing to be the arbitrator for the parties involved.”
- “Train mentors to address these needs on a volunteer basis.”
- “Landlords must also be held to a standard. And frankly, property taxation may need to be considered as to how high they can be taxed on their non-owner-occupied facilities. When the landlords are taxed too high, the cost of rent goes up and the maintenance doesn’t always follow suit.”
Housing practices and programs. Per the City of Sioux Falls Stakeholder Survey 2019, respondents share recommendations to address housing practices and programs that contribute to fair housing issues. Overwhelmingly, responses are rooted in education and collaboration among public, private, and nonprofit entities.

- “We need better education of landlords and enforcement for those who are breaking fair housing standards, local ordinance and generally being slum lords. But we also need to find resources and partnerships to assist hard-to-place tenants with the legitimate issues landlords have that are keeping them from housing.”

- “We should have an attorney that can help enforce the laws that are already in place and keeping landlords accountable, for example, not letting them get away with illegal evictions. Fair housing should address all fair housing issues and not just discrimination and retaliation claims. Most don't have money to get an attorney or have anyone to advocate for them. Landlords should be required to take a course on rights and responsibilities prior to being allowed to operate as a landlord.”

- “Bring in all the entities who deal with these issues on a regular basis. I can't speak to all of the needs, but put us all together, and we can come up with solutions.”

- “Education, prevention, collaboration. Again, seek input from case managers and clients.”

State and federal regulations and policies. Forty percent of respondents share that the state school funding formulas that do not create equity between “have” and “have not” districts are a very serious fair housing issue or contributing factor. One in four respondents also believe that state regulations that govern renter evictions is a very serious fair housing issue or contributing factor (based on survey response rates at 8 and 9 on the seriousness scale from 1 to 9).

- “We should review HUD and SDHA rules and regulations that are negatively affecting our work in Sioux Falls and work to change policy/law.”

- “Current state property tax regulations that set rental properties the same as commercial limits investments.”

Local and jurisdictional regulations and policies. Nearly half of respondents share that lack of enforcement or lack of regulations governing housing condition/quality is a very serious fair housing issue or contributing factor. Also, nearly 50 percent of survey participants say that laws or policies that limit adequate availability of public transportation is a serious or very serious fair housing issue or contributing factor (based on survey response rates at 6 or greater on a seriousness scale from 1 to 9).

Respondents offered some actionable recommendations to address the above fair housing issues or factors. Common suggestions include expanding public transportation routes and
times; more quality, affordable housing dispersed throughout the city, including in workforce areas; and better access to community services, such as access to healthy foods.

One survey participant reiterated the importance of expanding the accessibility of public transportation and say, “We need to allow bus routes to run longer hours and go to outer parts of the city where they are finding room to build multi-family units so they have transportation and close to grocery stores and services.”

**Stakeholder Perceptions of Fair Housing Barriers**

The stakeholder survey conducted for the Consolidated Plan and AI update asked about fair housing challenges in the city across a variety of topics including:

- Housing location;
- Housing availability;
- Housing practices and programs;
- State and federal regulation and policies;
- Local and jurisdictional regulations and policies;
- Access to opportunity; and
- Capacity, knowledge and resource issues.

Figure 34 shows all statements that stakeholder rated a 6.5 or higher (on average) on a scale of 0 to 9 where 0 is Not a Fair Housing Issue or Contributing Factor and 9 is A Very Serious Fair Housing Issue or Contributing Factor.
Figure 34.
On a scale from 0 to 9, where 0 is Not a Fair Housing Issue or Contributing Factor and 9 is A Very Serious Fair Housing Issue or Contributing Factor, please rate the level of seriousness of the following statements:

<table>
<thead>
<tr>
<th>Issue</th>
<th>Category</th>
<th>Average Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of Case Management for Critical Housing Needs</td>
<td>Capacity, Knowledge, and Resources</td>
<td>7.62</td>
</tr>
<tr>
<td>Affordable housing in poor condition</td>
<td>Housing Availability</td>
<td>7.47</td>
</tr>
<tr>
<td>Lack of affordable housing near proficient schools</td>
<td>Housing Location statements</td>
<td>7.24</td>
</tr>
<tr>
<td>Lack of enforcement or lack of regulations governing housing condition/quality</td>
<td>Local and jurisdictional regulations and policies</td>
<td>7.21</td>
</tr>
<tr>
<td>Lack of Financial Education and Literacy</td>
<td>Capacity, Knowledge, and Resources</td>
<td>7.13</td>
</tr>
<tr>
<td>Lack of availability of public transportation near affordable housing</td>
<td>Housing Location statements</td>
<td>7.06</td>
</tr>
<tr>
<td>Local elected officials not being aware of state or federal fair housing laws</td>
<td>Capacity, Knowledge, and Resources</td>
<td>7.04</td>
</tr>
<tr>
<td>Insufficient availability of public transportation</td>
<td>Access to Opportunity</td>
<td>7.03</td>
</tr>
<tr>
<td>Lack of Case Management for Mental Health</td>
<td>Capacity, Knowledge, and Resources</td>
<td>7.00</td>
</tr>
<tr>
<td>Lack of Case Management for Accessing Housing Resources</td>
<td>Capacity, Knowledge, and Resources</td>
<td>6.97</td>
</tr>
<tr>
<td>Lack of funding or assistance for housing accessibility modifications</td>
<td>Capacity, Knowledge, and Resources</td>
<td>6.96</td>
</tr>
<tr>
<td>Affordable rental housing only located in high-poverty, low opportunity areas</td>
<td>Housing Location statements</td>
<td>6.91</td>
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<tr>
<td>Lengthy time of investigating fair housing complaints</td>
<td>Capacity, Knowledge, and Resources</td>
<td>6.90</td>
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<tr>
<td>Landlords not being aware of local, state or federal fair housing laws</td>
<td>Capacity, Knowledge, and Resources</td>
<td>6.90</td>
</tr>
<tr>
<td>Lack of affordable, integrated housing for individuals who need supportive services</td>
<td>Housing Availability</td>
<td>6.84</td>
</tr>
<tr>
<td>Deteriorated and abandoned vacant properties concentrated in certain areas</td>
<td>Access to Opportunity</td>
<td>6.82</td>
</tr>
<tr>
<td>Lack of resources for fair housing agencies and organizations</td>
<td>Capacity, Knowledge, and Resources</td>
<td>6.81</td>
</tr>
<tr>
<td>Neighborhood or community distress or disinvestment</td>
<td>Access to Opportunity</td>
<td>6.78</td>
</tr>
<tr>
<td>Lack of regional coordination</td>
<td>Access to Opportunity</td>
<td>6.71</td>
</tr>
<tr>
<td>NIMBYism/community opposition or resistance to development by neighbors</td>
<td>Housing Practices and Programs</td>
<td>6.69</td>
</tr>
<tr>
<td>Lack of affordable in-home or community-based supportive services available to residents</td>
<td>Access to Opportunity</td>
<td>6.60</td>
</tr>
<tr>
<td>Lack of new housing development in workforce areas</td>
<td>Housing Location statements</td>
<td>6.59</td>
</tr>
<tr>
<td>Lack of community revitalization strategies</td>
<td>Access to Opportunity</td>
<td>6.56</td>
</tr>
<tr>
<td>Lack of local public or private fair housing enforcement</td>
<td>Capacity, Knowledge, and Resources</td>
<td>6.56</td>
</tr>
<tr>
<td>Lack of or disparities in public investment (e.g., services, public facilities, infrastructure) in specific</td>
<td>Access to Opportunity</td>
<td>6.55</td>
</tr>
<tr>
<td>Lack of larger housing units for families</td>
<td>Housing Availability</td>
<td>6.52</td>
</tr>
</tbody>
</table>

Note: n=35.
**Fair Housing Challenges and Action Plan**

The 2012 AI identified the following potential impediments to fair housing choice:

- Minority households in Sioux Falls, particularly Black and Hispanic households are less likely to be homeowners.
- The City’s existing supply of both affordable and accessible housing is inadequate and does not meet current demand levels.
- Community Development’s process for allocating and reporting CDBG and HOME funds could be improved from a fair housing perspective.
- The majority of fair housing complaints filed involved disability as the primary basis for alleged housing discrimination indicating a need for continued fair housing testing, education, training, and outreach, particularly among landlords. This indicates that there is a lack of fair housing awareness.
- It is unclear whether the City adequately meets the language needs of persons with LEP, especially given its growing population in recent years.
- Transit-dependent households are in need of additional public transit services to provide better linkages to employment centers and amenities.
- Cost Burden (Housing Cost v. Income Available).
- Transportation.
- Mortgage loan denial and high-cost lending disproportionately affect minority applicants.

This AI update finds that many of these potential impediments remain true today. The top fair housing challenges identified through this update are:

- Lack of affordable housing—particularly in areas with access to opportunity—along with racial/ethnic disparities in housing needs and home ownership rates;
- Limited access to transit which disproportionately impacts people with disabilities who are transit dependent and extremely low income households who are transit dependent; and
- Lack of fair housing knowledge and resources to address fair housing concerns.

Figure 35 presents the Action Plan from the 2012 AI along with updates for this 2019 AI Update.
Figure 35.
Fair Housing Action Plan

<table>
<thead>
<tr>
<th>Impediment / Goal</th>
<th>Strategies to Meet Goals</th>
<th>2019 Update</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impediment No. 1. Minority households in Sioux Falls, particularly blacks and Hispanics, were less likely to be homeowners.</td>
<td>A. Identify effective ways for the City, certified housing counselors to continue their work to increase home ownership among minorities. Potential strategies include increased education, marketing, and outreach efforts.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>1 Increase homeownership opportunities among minority and lower-income households.</td>
<td>A. Identify effective ways for the City, certified housing counselors to continue their work to increase home ownership among minorities. Potential strategies include increased education, marketing, and outreach efforts.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td></td>
<td>B. Continue requiring that all HOME-assisted units meet the ADA and Uniform Federal Accessibility Standards.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>Impediment No. 2. The City's existing supply of both affordable and accessible housing is inadequate and does not meet current need.</td>
<td>A. Continue to strike a balance in investing in both impacted and nonimpact areas.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>2 Increase the supply of decent, affordable housing and accessible housing throughout the city.</td>
<td>A. Continue to strike a balance in investing in both impacted and nonimpact areas.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td></td>
<td>B. Continue requiring that all HOME-assisted units meet the ADA and Uniform Federal Accessibility Standards.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>Impediment No. 3 Community Development's process for allocating and reporting CDBG and HOME funds could be improved from a fair housing perspective.</td>
<td>A. Allocate 1% to 3% of the City's yearly CDBG entitlement grant for pure fair housing activities such as education, outreach, training, and enforcement.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>3 Improve processes for allocating and reporting investments of entitlement funds to ensure compliance with applicable laws and regulations.</td>
<td>A. Allocate 1% to 3% of the City's yearly CDBG entitlement grant for pure fair housing activities such as education, outreach, training, and enforcement.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>Impediment No. 4. Need for continued fair housing education, training, and outreach, particularly among landlords, as well as the general public. There is a general lack of fair housing awareness.</td>
<td>A. Partner with HRC to offer annual fair housing training seminars to area landlords and property management companies as well as the general citizenry.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>4 Support fair housing education, outreach, and training to reduce housing discrimination.</td>
<td>A. Partner with HRC to offer annual fair housing training seminars to area landlords and property management companies as well as the general citizenry.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td></td>
<td>B. Contract with a qualified fair housing instructor to conduct fair housing training annually.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>5 Have qualified, independent, and knowledgeable fair housing training provided on an annual basis.</td>
<td>B. Contract with a qualified fair housing instructor to conduct fair housing training annually.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>6 To enhance marketing and knowledge of fair housing laws. Provide links to fair housing questions.</td>
<td>C. Put fair Housing information on City's home web page.</td>
<td>Accomplished. Could improve by adding info in multiple languages.</td>
</tr>
</tbody>
</table>

Source: City of Sioux Falls 2012 AI and Root Policy Research.
### Fair Housing Action Plan

<table>
<thead>
<tr>
<th>Impediment / Goal</th>
<th>Strategies to Meet Goals</th>
<th>2019 Update</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impediment No. 5. It is unclear whether the City adequately meets the language needs of persons with LEP, especially given its growing population in recent years.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 Improve access to programs and services for persons with LEP.</td>
<td>Conduct the four-factor analysis to determine the extent to which an LAP may be needed.</td>
<td>Accomplished. Continue to monitor and update LAP as necessary.</td>
</tr>
<tr>
<td><strong>Impediment No. 6. Transit-dependent households are in need of additional public transit services to provide better linkages to</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8 Increase access to public transit options for minority households.</td>
<td>A. The City should continue to provide an annual contribution to Sioux Area Metro.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td></td>
<td>B. Identify opportunities for the development of medium and high density affordable family housing along existing transit routes. Collaborate with Sioux Area Metro to adequately serve these areas with public transit.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td><strong>Impediment No. 7. Cost Burden (Housing Cost v. Income Available).</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9 Reduce cost burdens that stretch household budgets to the breaking point. High housing costs drain household resources needed for other staples such as food and transportation.</td>
<td>A. Continue developing partnerships with lenders, Realtors, developers, bankers.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td>10 Decrease the high cost of housing in some areas of the city limits housing choice for low income households, creating a situation where the poor become concentrated in small areas of the city.</td>
<td>A. Continue to work with builders and developers to expand housing stock.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td></td>
<td>B. Continue to partner with developers and lenders to develop in all areas of the city.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td><strong>Impediment No. 8. Transportation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11 To solve issues in transportation as impediments were most apparent in the route system as well as in the hour of service.</td>
<td>Work with SAM to change routes and hours and to look for additional funding sources to aid in those changes.</td>
<td>Continue to pursue.</td>
</tr>
<tr>
<td><strong>Impediment No. 9. Mortgage loan denials and high-cost lending disproportionately affect minority applicants.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 Increase and enhance fair housing outreach and education efforts throughout the City.</td>
<td>A. Encourage HUD-approved homebuyer counseling providers to continue this invaluable service for lower-income and minority households.</td>
<td>Continue to pursue.</td>
</tr>
</tbody>
</table>

Source: City of Sioux Falls 2012 AI and Root Policy Research.
Fair Housing Appendix

The city’s 2012 AI included a comprehensive background on the Fair Housing Act, the Americans with Disabilities Act, and related concepts. That section is included here as reference.

The Federal Fair Housing Act

1. What Housing is Covered? The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

2. What Does the Fair Housing Act Prohibit?

- **In the sale and rental of housing.** No one may take any of the following actions based on race, color, religion, sex, disability, familial status, or national origin:
  
  - Refuse to rent or sell housing.
  - Refuse to negotiate for housing.
  - Make housing unavailable.
  - Deny a dwelling.
  - Set different terms, conditions or privileges for the sale or rental of a dwelling.
  - Provide different housing services or facilities.
  - Falsely deny that housing is available for inspection, sale, or rental.
  - For profit, persuade owners to sell or rent (blockbusting).
  - Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

- **In mortgage lending.** No one may take any of the following actions based on race, color, religion, sex, disability, familial status, or national origin:
  
  - Refuse to make a mortgage loan.
  - Refuse to provide information regarding loans.
  - Impose different terms or conditions on a loan, such as different interest rates, points, or fees.
  - Discriminate in appraising property.
  - Refuse to purchase a loan.
  - Set different terms or conditions for purchasing a loan.
Other prohibitions. It is illegal for anyone to:

- Threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right.
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability, familial status, or national origin.
- This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

3. Additional Protections for People with Disabilities. If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person’s expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the disabled person to use the housing.

For example, a building with a “no pets” policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

4. Housing Opportunities for Families with Children. Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent or a person who has legal custody of the child or children or the designee of the parent or legal custodian with the parent or custodian’s written permission. Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.
- Housing for older persons is exempt from the prohibition against familial status discrimination if:
  - The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state, or local government program.
  - It is occupied solely by persons who are 62 or older.
  - It houses at least one person who is 55 or older in at least 80 percent of the occupied units, and it adheres to a policy that demonstrates the intent to house
persons who are 55 or older as previously described. A transition period permits residents on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

5. Recent Changes to HUD Program Regulations. As of a final rule, effective March 5, 2012, HUD implemented a policy with the intention of ensuring that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. In response to evidence suggesting that lesbian, gay, bisexual, and transgender individuals and families were being arbitrarily excluded from housing opportunities in the private sector. HUD’s aim was to ensure that its own programs do not allow for discrimination against any eligible person or household and that HUD’s own programs serve as models for equal housing opportunity. This change to the HUD program regulations does not amend the Fair Housing Act to prohibit all discrimination in the private market on the basis of sexual orientation, gender identity, or marital status. However, it prohibits discrimination of those types by any housing provider who receives HUD funding, including public housing agencies, those who are insured by the Federal Housing Administration, including lenders, and those who participate in federal entitlement grant programs through HUD.

Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the fair housing analysis. These standards are listed below along with a summary of the features within each category or a direct link to the detailed standards.

1. Fair Housing Act. In buildings that are ready for first occupancy after March 13, 1991, and include four or more units:

   - There must be an accessible entrance on an accessible route.
   - Public and common areas must be accessible to persons with disabilities.
   - Doors and hallways must be wide enough for wheelchairs.
   - All ground floor units and all units in elevator buildings must have:
     - An accessible route into and through the unit.
     - Accessible light switches, electrical outlets, thermostats, and other environmental controls. ¾ Reinforced bathroom walls to allow later installation of grab bars.
     - Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.
2. **Americans with Disabilities Act (ADA).** ADA standards are required to ensure equal access to places of public accommodation and commercial facilities by individuals with disabilities. These building standards are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by federal agencies, including the Department of Justice (DOJ), under the Americans with Disabilities Act of 1990 (ADA). Revised ADA Title II and III Regulations were adopted by the DOJ in 2010 and included the 2010 ADA Standards for Accessible Design, or the “2010 Standards.” As of March 15, 2012, compliance with the 2010 Standards is required for new construction, for alterations, and for places of recreation where guidance did not previously exist. These recreational areas include swimming pools, exercise equipment, golf courses, play areas, saunas and steam rooms, and boating and fishing platforms.

Changes incorporated into the 2010 standards include:

- Addition of technical requirements based on children’s dimensions.
- Use of ranges rather than absolutes for most elements.
- Location of accessible routes must be in general circulation paths.
- If a circulation path is provided between seated areas and a stage, it must be accessible.
- All direct entrances in multilevel parking garages must be accessible.
- More guidance on location of accessible seating in assembly areas.
- Single-user toilet rooms must now provide both a parallel and side approach to a water closet.

A complete description of the guidelines can be found at: www.ada.gov/2010ADAstandards_index.

ADA regulations are to be followed to ensure equal access to programs for people with disabilities. Compliances with the revised ADA Title II and III Regulations began on March 15, 2011. In addition to the changes listed above, the amended regulations include revisions to definitions of service animals, wheelchairs and other power-driven mobility devices, and updated guidance for the provision of auxiliary devices and accessible ticketing practices.

A complete description of the revised ADA Title II and III Regulations can be found online at: www.ada.gov/regs2010/ADAregs2010.

3. **Uniform Federal Accessibility Standards (UFAS).** UFAS accessibility standards are required for facility accessibility by physically handicapped persons for federal and federally funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural

4. **Section 504.** Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that at least 5 percent of all public housing units be accessible to persons with mobility impairments. In addition, at least 2 percent of public housing units must be accessible to persons with sensory impairments. These are minimum requirements. A higher percentage may be required in circumstances where greater need is determined by the PHA. The 2 percent sensory-accessible unit requirement can be a mobile requirement, depending on where the tenant with visual and/or impairments could stay in a standard unit. In addition, a PHA’s administrative offices, application offices, and other nonresidential facilities must be accessible to persons with disabilities. Either the Uniform Federal Accessibility Standards (UFAS) or other safe harbor accessibility standards are the standard against which residential and nonresidential spaces are judged to be accessible.

5. **Visitability Standards.** The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance.
- Doors and hallways wide enough to navigate a wheelchair through.
- A bathroom on the first floor big enough to get into in a wheelchair and close the door.

6. **Universal Design.** Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide the Universal Design. These include:

- Equitable use (e.g., make the design appealing to all users).
- Flexibility in use (e.g., accommodate right- or left-handed use).
- Simple and intuitive use (e.g., eliminate unnecessary complexity).
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations).
- Tolerance for error (e.g., provide fail-safe features).
- Low physical effort (e.g., minimize repetitive actions).