



Impediments to Fair Housing 2025 - 2030

Acknowledgements

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Special Thanks To:

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Housing Commission Members

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Table of Contents

Executive Summary.....	Pg. 3
Introduction.....	Pg. 7
Community Participation.....	Pg. 10
Focus Groups.....	Pg. 10
Survey.....	Pg. 11
Assessment of Past Goals.....	Pg. 13
Fair Housing Activities.....	Pg. 16
Complaints.....	Pg. 16
Lawsuits.....	Pg. 18
Housing Inspections.....	Pg. 19
Fair Housing Materials.....	Pg. 20
Demographic Data.....	Pg. 21
Housing Profile.....	Pg. 36
Access to Opportunity.....	Pg. 50
2025 and Forward.....	Pg. 68
Goals and Actions.....	Pg. 68
Conclusion.....	Pg. 71
Appendix.....	Pg. 72
Definitions.....	Pg. 72
Table of Figures.....	Pg. 75
Survey Questions and Results.....	Pg. 77

Executive Summary

This document outlines the Analysis of Impediments to Fair Housing Choice (AI) for the City of Dubuque, Iowa. The U.S. Department of Housing and Urban Development (HUD) requires an AI for communities that receive federal housing and community development funds. These funds come from the Community Development Block Grant (CDBG) program, which supports affordable housing, anti-poverty efforts, and infrastructure development. Dubuque must perform this analysis as part of their Five-Year CDBG Consolidated Plan. This is also required for Section 8 Housing Choice Voucher Program.

This Executive Summary highlights key findings from the 2025 Analysis of Impediments to housing and access to opportunities in Dubuque. It also proposes action items to overcome these obstacles. The AI consists of four main sections that include data, trends, maps, and analysis. Generally, the AI is structured to reflect on past conditions and efforts, examine the current environment, and anticipate future developments.

This Analysis of impediments aims to advance upon previous efforts made by the City through its comprehensive plan, Imagine Dubuque, which has already set forth strategies to expand affordable housing and improve the conditions of the aging housing stock. Additionally, the City's Equitable Poverty Prevention Plan provides best practice approaches to address poverty that impacts Dubuque's youngest and oldest residents, women, and communities of color the most. These plans, along with the 2019 Impediments to Fair Housing Plan set a stage for this AI to build from.

Along with the importance of previous plans, HUD's Fair Housing Planning Guide highlights the importance of public engagement. Community members possess the deepest understanding of their own community and input from over 450 Dubuque residents, gathered through focus groups and a community-wide survey, played a crucial role in the development of this AI. Their insights, along with data from the U.S. Census Bureau and other relevant sources, shaped the proposed five-year fair housing goals and actions.

The key barriers identified throughout this AI were as follows:

- Lack of available, affordable, quality housing.
- The Housing Choice Voucher Program is still not accepted city-wide; current locations of HCVs show higher usage in concentrated areas of poverty and older housing stock.
- Unequal access to opportunities and resources within Dubuque such as school quality, food, and transportation.
- More affordable childcare, activities, and programming.

The matrix below is to be used as a guide to help prioritize actions that should be taken to help address these barriers and continue to foster the growth and development of Dubuque in regard to fair housing and opportunities for all residents.

The Dubuque community has a history of coming together to address challenges collaboratively. By building on the foundation of Imagine Dubuque and aligning with the Equitable Poverty Prevention Plan, this analysis not only fulfills federal requirements but also supports the City of Dubuque in its mission to foster a more equitable, sustainable, and livable community for all its residents.

Proposed Fair Housing Plan

Goal #1: Advance equity with fair housing advocacy, education, and enforcement.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
Housing Choice Vouchers are not being protected as a source of income for many rental units and many landlords do not accept them. This limits where individuals and families are able to live and the type of housing available to them.	Continue working with landlords in Dubuque to educate them on the benefits and importance of Housing Choice Vouchers in order to expand the program throughout Dubuque.	
	Create more educational opportunities for first time homebuyers and renters on topics like financial literacy and home maintenance.	
	Enhance education and training for landlords through the Successful Property Maintenance course that the PHA presents regarding the Housing Choice Voucher Program.	
	Provide educational resources about pets in Housing Choice Voucher units.	

Goal #2: Implement local government policies that encourage equity and decrease disparate impacts.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
While childcare has grown over the past few years, there is still a need for more, affordable childcare and activities for children in Dubuque. (Noted in Focus Groups).	Look into partnering with schools or other organizations to provide more public activities, amenities, and programs to children in underserved parts of Dubuque.	
	Continue to grow affordable childcare and consider care for special needs children and children whose parents work the 2nd or 3rd shift.	

Goal #3: Increase and promote safe, affordable housing.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
Lack of quality, affordable housing stock.	Allocate more resources and work with Iowa Finance Authority (IFA) and other agencies to grow affordable housing development and provide incentives for developers to include affordable units in their projects.	
	Implement policies to protect, maintain, and grow current affordable housing stock, including working with homeowners, landlords, and tenants.	
	Investigate to ensure that current affordable housing is not at risk of being converted to higher-end units.	
Home ownership in Dubuque for non-white residents can be challenging as they tend to face more barriers such as denied loans, language barriers, and general lack of awareness of the materials and resources available to them.	Develop a policy for regular review of City administered lending practices for fair housing issues. Include, at a minimum, loans for home purchase, home improvement, and refinancing.	
	Consider creating an independent fair housing testing program to ascertain if prohibited discriminatory practices are occurring.	

	Ensure translations are available for all important documents and applications and easily accessible both online and in physical form.	
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Goal #4: Increase access to opportunity and the building of social capital.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
The nonprofit service array is confusing to consumers.	Use assessments from the Equitable Poverty Prevention Plan and any other relevant plans regarding the nonprofit services array and gaps to make necessary improvements that increase access to opportunity and coordinated entry.	
Unequal access to opportunities and resources such as food, quality education, and transportation.	Increase regional cooperation among service providers.	
	Consider community gardens or incentivize grocery store development within food-insecure neighborhoods of Dubuque.	
	Identify transportation gaps throughout Dubuque for those that may not have their own vehicles and rely on walking, biking, or public transportation.	

Introduction

This section provides the context for the Analysis of Impediments document with a brief overview of Fair Housing Law and the methodology used to develop this AI.

The City of Dubuque is the lead agency responsible for preparing the analysis (AI), the Community Development Block Grant (CDBG) 5-Year Consolidated Plan and subsequent Annual Action Plans. The City's Housing & Community Development Department (HCD) is responsible for managing CDBG activities, funding, and policies. The City contracted with MSA Professional Services to assist in the AI development. The U.S. Department of Housing and Urban Development (HUD) has not issued regulations defining the scope of analysis and the format to be used by CDBG grantees when they prepare their AIs.

HUD does provide a Fair Housing Planning Guide which includes a 'Suggested AI Format' which was used in the development of this report. Fair Housing Choice is equal opportunity housing. It is the right of all people to obtain housing, of their choice, without discrimination. To complement this, Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act (FHA), was passed by Congress to prohibit discrimination concerning the sale, rental and financing of housing based on race, religion, national origin, gender, or sexual orientation. The FHA was amended in 1988 to provide stronger penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination because of familial status and disability.

"Impediments to fair housing choice" is anything that impedes equal opportunity housing, the ability of individuals and families to have the information, opportunity, and option to live where they choose without unlawful discrimination and other barriers related to race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, or disability. Impediments to fair housing choice encompasses:

1. Actual choice, which is the existence of realistic housing options;
2. Protected choice, which is housing that can be accessed without discrimination; and
3. Enabled choice, which is the realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs as required under Federal civil rights law, including disability-related services that an individual needs to live in such housing.

The Fair Housing Act

The Fair Housing Act safeguards certain groups from discrimination in securing and keeping housing. This law covers the rental or sale of residential units, with exceptions for single-family homes (provided the owner has no more than three such homes) and buildings with up to four units where one unit is owner-occupied

Discrimination based on the following characteristics is prohibited under the act:

- Race
- Color
- Religion
- National Origin
- Sex (including sexual orientation and gender identity)
- Familial Status
- Disability

HUD generally defines impediments to fair housing to include acts or omissions in three categories:

1. Actions which constitute violations or potential violations of the Fair Housing Act;
2. Actions which are counter-productive to fair housing choice such as resistance to the introduction of minority, immigrant, disabled, or low-income populations into a community;
3. Actions which have the effect of restricting housing opportunities on the basis of protected class membership.

As an entitlement city that receives a direct allocation from HUD, the City must also certify that it completes required actions to affirmatively further fair housing. These actions entail:

- Analyzing and eliminating housing discrimination within the City’s jurisdiction;
- Promoting fair housing choice for all persons;
- Creating opportunities for diverse racial and ethnic groups to live in inclusive housing communities;
- Promoting housing that is physically accessible to persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the FHA.

There are two types of discrimination:

- Intentional discrimination against a protected class; and
- Disparate impact, practices not necessarily intended to discriminate but that have a disproportionately adverse effect on a protected class.

AI Methodology

The AI development process involved looking at a variety of data sources related to housing and persons who are in protected classes under civil rights law. The U.S. Census Bureau’s American Community Survey 5-year estimates (2018-2022) is the primary dataset used consistently throughout the AI unless noted as unavailable or where other reliable data sources were utilized. Data was collected and evaluated through a mixed-method approach:

1. Primary Research – the collection and analysis of raw data that did not previously exist;
2. Secondary Research – the review of existing data and studies;
3. Quantitative Analysis – the evaluation of objective, measurable, and numerical data;
4. Qualitative Analysis – the evaluation and assessment of subjective data such as people's beliefs, feelings, attitudes, opinions, and experiences

Community Participation

HUD encourages meaningful citizen participation in the AI development process. This section outlines Dubuque’s initiatives to involve the community in addressing barriers to fair housing.

- Methodology
- Participants
- Summary of Input and Potential Solutions

Methodology

A variety of engagement methods were used to obtain information for the AI, including focus groups, a community-wide survey, and other public meetings.

Participants

Focus Groups

Four focus groups were held to collect input from groups of residents and professionals with specific backgrounds and unique perspectives on fair housing impediments. In most cases, the City worked with local agencies and organizations to host and promote the focus groups to respective members or clients. The core community engagement guide for focus groups, stakeholder interviews, and survey questions may be found in the Appendix to this study.

Groups engaged

It was important to engage the following groups to get a diverse range of input from those with a vested interest in the topic:

- Homeless Advisory Coalition
 - Friends of the Family
 - CSEI – Community Solutions of Eastern Iowa
 - Rescue Mission
 - Almost Home
 - St. Vincent DePaul
 - Crescent Community Health Center
 - Four Oaks
 - Hillcrest Path
 - Iowa Works
 - Almost Home
 - Opening Doors
 - Operation Empower
 - Dubuque Veterans
 - Dubuque Food Pantry
 - Dubuque County Public Health

- Fountain of Youth
- DCSD School Staff
- Project Hope
 - Community Foundation of Greater Dubuque
 - ECIA – East Central Intergovernmental Association
 - GDDC – Greater Dubuque Development Corporation

Focus Groups Input Themes

The focus group participants provided invaluable input. Barriers to fair housing choice shared were a wide and deep range, from affordability to living wages, the need for job search assistance, and the lack of permanent supportive housing as well as the following topics were discussed:

- Challenges with Landlords:
 - Reluctance to Take Risks:
 - Individuals with limited rental history,
 - Those with poor or no credit,
 - Funding to maintain properties.
 - Non-Acceptance of Vouchers
- The cost to rent or buy is too high for many.
- Multigenerational households are not understood.
- Cultural and communication barriers.
- More educational opportunities for house buyers, renters, and landlords.
- More expansive public transportation throughout Dubuque.

Survey

The City of Dubuque implemented the Housing and Community Development Survey, which asked residents a variety of questions ranging from what they believed the needs of the community were, to what major barriers make housing difficult in the City.

Four hundred and fifty one people took the Housing and Community Development Survey provided by the City of Dubuque. Of those 451, 76% said that they believe that some services are less available or accessible to some people in the community.

Key Themes from Survey

- More shelter/housing.
- More jobs and higher wages.
- More access and availability of childcare, healthcare for children, and programming for children.

- Better food access/security.

Top Barriers to Access:

- Income level
- Physical Ability
- Brain Health
- Age
- Race

Abused and neglected children were also seen as a major concern by 62% of survey respondents, although there was no data to support this as an active problem in Dubuque.

It should be noted that the key themes taken from the Focus Groups and Survey may not match those identified in this AI due to them being based on opinion and personal experience as opposed to data collection and analysis.

Assessment of Past Goals

This section examines Dubuque’s past goals and the actions taken:

- Four fair housing goals were established in FY2020.
- Of those goals, there has been progress with respect to three action steps. Two action steps from the goal “Increase access to opportunity and the building of social capital” and one from “Advance equity and fair housing advocacy, education, and enforcement” were not completed.
- The action step “Use assessments currently underway (Equitable Poverty Prevention Plan process and another group’s review) regarding the nonprofit services array and gaps to make necessary improvements that increase access to opportunity” was still deemed relevant and carried over to the 2025 goals and actions.

FY2020 Fair Housing Goals: Progress & Action

Action	Success or Completed Steps
Goal: Advance equity with fair housing advocacy, education, and enforcement.	
Continue obtaining accurate Housing Choice Voucher data from landlords as to the number of units, location of units, vacancies, and denials of rental applications; identify landlords unwilling to accept HCVs and conduct targeted outreach and education.	Data collected on ~90% (10,601 units) of licensed rental units indicates approximately 32% (3,386 units) of landlords would consider renting to an HCV tenant if there was a vacancy.
Publish HCV program information, particularly vacancies, in real time via a website	The Vacant Unit Listing is updated on the City's Website weekly (every Tuesday) once property owners notify the City of vacancy. On that same page, other resources are listed that may have units listed to aid in the search for a rental unit. Collect voucher acceptance & vacancy data for every licensed rental property in the city. https://cityofdubuque.org/726/Housing-Choice-Voucher-Section-8
Implement communication and trust-building activities for landlords and HCV program participants such as “Meet and Lease” events or other national promising approaches	The City of Dubuque has increased landlord education about the HCV program as well as created a landlord education video to be shared among that specific group to clarify how HCV benefits the entire community. PHA also implemented a new, easier to use software that aids owners and tenants in communication and document transmittal. The City of Dubuque meets monthly with the Landlord Association to further connection and collaboration efforts. FY24 was focused on recruitment of landlord participation through the Successful Property Maintenance Course and through the networking of individuals through the Landlord Association

Assess Human Rights Commission and support capacity building efforts, including publication of a strategic plan	Action not taken.
Review the inventory of fair housing education materials (e.g., fact sheets), and update to reflect the languages spoken in the community and what community members say they most want and need	Efforts continue to translate all necessary documents into Spanish and Marshallese to break down communication barriers and allow easier accessibility to programs and information for the entire community. PHA is focusing efforts on translation services and interpreter needs and accessibility. Assessed & revised our HCV general forms for readability and adapted them all to a 6-7th grade level. PHA is also working on reducing our applications/forms of asking for unneeded information in order to make the processes less burdensome on participants. Efforts increased to create more social media presence to engage the community through education and awareness. A landlord education video was released in Spring of 2022. City staff are also researching the potential benefits of offering a tenant education course and other ways to lessen the burden of moving and unit damage.
Establish an external fair housing testing program for residential, accessibility, sales and lending or insurance discrimination to identify the problems members of protected classes face when seeking housing in Dubuque.	Grant awarded to Iowa Legal Aid to create testing program.

Actions	Successes or Completed Actions
Goal: Increase and promote safe, affordable housing.	
Continue implementation of the Imagine Dubuque strategies, and the City Housing and Community Development Department's efforts to affirmatively further fair housing through licensing and tiered inspections, making decisions more transparent	Inspections cycle has been reduced to <4 years between routine inspections and Council recently approved moving to a 2-year license and inspection cycle with the ability for properties in good standing to self-certify code compliance every other cycle.
To build community trust, publish short (e.g., one pagers or data dashboard if possible) updates regarding the increase in safe, affordable housing	Adoption of the 2016 International Property Maintenance Code to hold units to a higher standard with the goal of providing quality, healthy, and safe environments for citizens to choose to live in. Code enforcement policies structured to give more attention to properties & owners that persistently fail inspections. Proactively address nuisance property owners through more frequent inspections, better maintenance, and safer units.
The City Council should take any and all appropriate action to protect the residents in mobile home communities. This protection may come in the form of	Application submitted for the PRICE Grant.

an ordinance or other action that promotes safe, affordable housing for the over 800 Dubuque residents who live in mobile homes	
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Action	Successes or Completed Actions
Goal: Implement local government policies that encourage equity and decrease disparate impacts.	
Audit the background check process required by local Ordinance for disparate impact.	Audited background check process from local ordinance requirements. City runs free background checks for landlords on prospective tenants for the HCV program. Arrest records were removed from the landlord background checks provided by the city – reviewed in April 2021 to ensure compliance with new forms.
Implement quarterly review of eviction data to evaluate for disparate impact.	Implement quarterly review of eviction data for disparate impacts. (We are unable to track this data due to lack of capability in the County Offices to support reporting. We continue to work with individuals and complaints about wrongful evictions.)
Educate regarding the impact of the state’s minimum wage and conduct activities to increase wages.	See the 23-24 Annual Report from Greater Dubuque Development Corporation. https://www.greaterdubuque.org/pdfs/23-24_Annual_Report_final_for_web.pdf
Continue exploring a Source of Income Ordinance.	Continue efforts of re-branding the HCV Program adopted by City Council as an alternative to a Source of Income Ordinance–In fiscal year 2020 the city focused on researching ways to incentivize landlords to accept HCV Program vouchers. We are still implementing efforts to increase landlord education surrounding the HCV program, a landlord education video was released in Spring of 2022. Despite efforts to promote landlord incentives in fiscal year 2021, we learned that they were not successful in increasing landlord participation. Fiscal year 2023 will focus more on the landlord/PHA communication to ensure those landlords that do participate in the HCV program continue to accept vouchers. Fiscal Year 2024 aims to enhance education and training for landlords through the Successful Property Maintenance course that the PHA presents regarding the HCV Program.
Evaluate the potential for including childcare proximity into housing development proposals and assess the feasibility of a local subsidy to support	See the 23-24 Annual Report from Greater Dubuque Development Corporation.

childcare and/or preschool accessibility, affordability, and quality.	https://www.greaterdubuque.org/pdfs/23-24_Annual_Report_final_for_web.pdf
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Action	Successes or Completed Actions
Goal: Increase access to opportunity and the building of social capital.	
Assess, develop, and implement metrics and strategies to reduce the Gender Wage Gap.	See the 23-24 Annual Report from Greater Dubuque Development Corporation. https://www.greaterdubuque.org/pdfs/23-24_Annual_Report_final_for_web.pdf
Increase community awareness about the impact of poverty and toxic stress on the brain; develop measurable equity and inclusion metrics.	OSPNS working to automate and visualize EPRPP data in a way that is accessible to the public.
Evaluate disparities in arrest rates by race and detail metrics and actions to decrease racially disproportionate arrest rates.	Action not taken.
Use assessments currently underway (Equitable Poverty Prevention Plan process and another group's review) regarding the nonprofit services array and gaps to make necessary improvements that increase access to opportunity.	Action not taken.
Assess the need for public transit to Northeast Iowa Community College programs in Peosta and make improvements as indicated	See the 23-24 Annual Report from Greater Dubuque Development Corporation. https://www.greaterdubuque.org/pdfs/23-24_Annual_Report_final_for_web.pdf

Fair Housing Activities

This section describes the City's fair housing activities and provides suggested ways to strengthen fair housing in Dubuque. The list below are the five areas of focus related to discrimination or acts deemed unfair that have taken place over the past 5 years within the City of Dubuque regarding housing.

- Fair Housing Complaints
- Lawsuits
- Inspections
- Resources/Materials
- Fair Housing Initiative Program

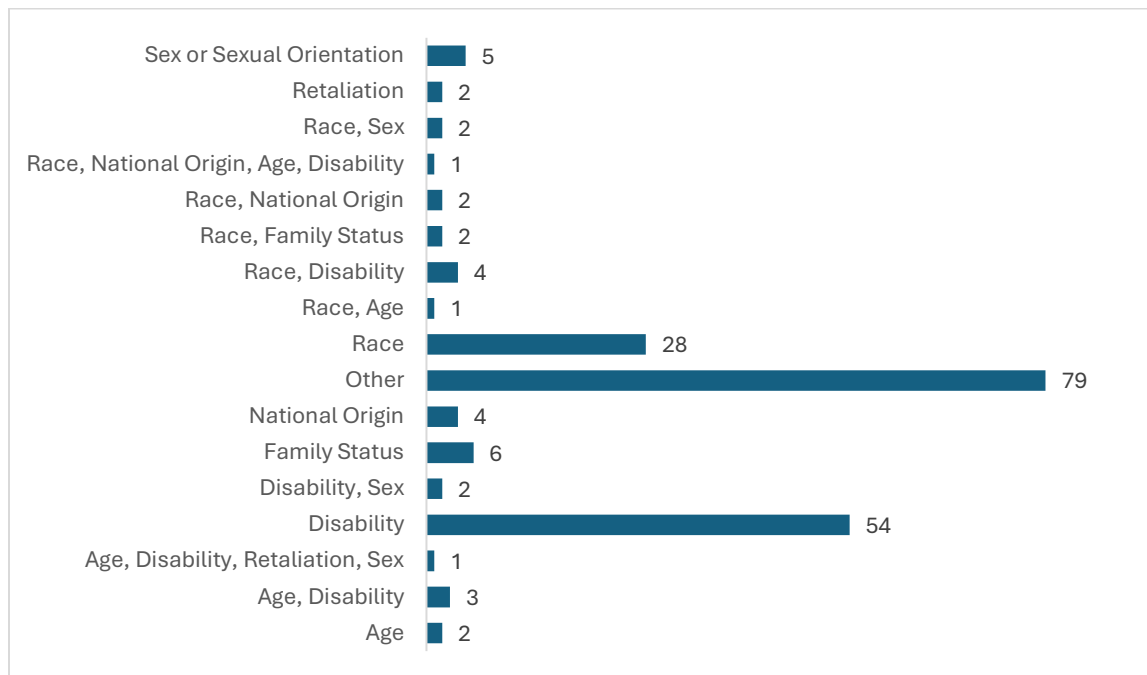
Under Iowa law, a city with a population of twenty-nine thousand, or greater, must maintain an independent local civil rights agency or commission. As a qualifying community, the City of Dubuque's Human Rights Commission (HRC), is comprised of 9 members appointed by the City Council for 3-year terms, holds the powers and duties that are detailed in Title 8 Dubuque Code of Ordinance. The City's fair housing ordinances comply with the Iowa Civil Rights Act (ICRA) provisions, per Section 8-2-12.

The City of Dubuque's Equity & Human Rights Department (HRD) reports to HUD, staffs the Human Rights Commission, and is responsible for enforcing City ordinances that include fair housing reports and complaints. The HRD forwards formal complaints to the Dubuque City Attorney's Office for investigation. The HRC sees its role as one of education with the City Attorney's Office providing investigation and enforcement.

Fair Housing Complaints

The department of Equity & Human Rights for the City of Dubuque has received 198 discriminatory complaints or inquiries about rights related to housing since 2019:

Figure 1: Fair Housing Complaints Since 2019.



Source: The City of Dubuque

The top three complaints received were based on disability, race, and “other”. The category “other” is generally used for inquiries about their rights rather than claims of discrimination based on a specific type of discrimination.

Lawsuits

Table 1: Lawsuits Filed Related to Fair Housing.

Date Filed	Area	Basis	Department	Outcome
ICRC				
10/12/2020	Housing and Retaliation	Race, Skin Color, National Origin, Sex, Disability, Religion, Familial Status, Retaliation	Housing	Administrative Closure
10/16/2020	Housing	Reasonable Accommodation and Disability	Housing	No Probable Cause
9/24/2021	Housing	Reasonable Accommodation and Disability	Housing	No Probable Cause

1/15/2023	Public Accommodation and Housing	Retaliation, Race, Skin Color	Housing	Administrative Closure
5/3/2024	Housing	Reasonable Accommodation and Disability	Housing	Pending
9/10/2024	Housing	Race	Housing	Pending
HUD				
7/8/2022	Housing	Reasonable Accommodation and Disability	Housing	Pending

Source: The City of Dubuque

Housing Inspections

The City of Dubuque adopts the International Property Maintenance Code (IPMC) along with local amendments and policies related to rental licensing and inspections which includes a tiered inspection policy. The IPMC has a new edition published by the International Code Council (ICC) every three years and the City currently adopts the 2021 version of the IPMC.

Currently (2024), inspections are being conducted on an approximate 4-year cycle. Beginning in 2025, rental licensing periods will be changed from an annual license to a biennial license and there will be an inspection required in each licensing period, so every two years, however properties in good standing will have the opportunity to self-certify code compliance every other cycle.

Fair Housing Resources/Materials

The City of Dubuque's website hosts a comprehensive collection of materials and resources for the City's Housing Programs. Currently, the City offers four types of housing programs: Housing Choice Voucher/Section 8, Home Improvement, Homebuyer, and Security Deposit Assistance. Applications for the Housing Choice Voucher Program/Section 8 and Security Deposit Assistance Program are available in both English and Spanish, along with staff contact information.

[Housing Programs | Dubuque, IA - Official Website](#)

[Equity & Human Rights | Dubuque, IA - Official Website](#)

Fair Housing Initiative Program

The City of Dubuque ended mandatory Fair Housing Training in 2021, as the program was terminated at that time. It continued Fair Housing Training in the housing department through a focus on it once a year.

Demographic Data

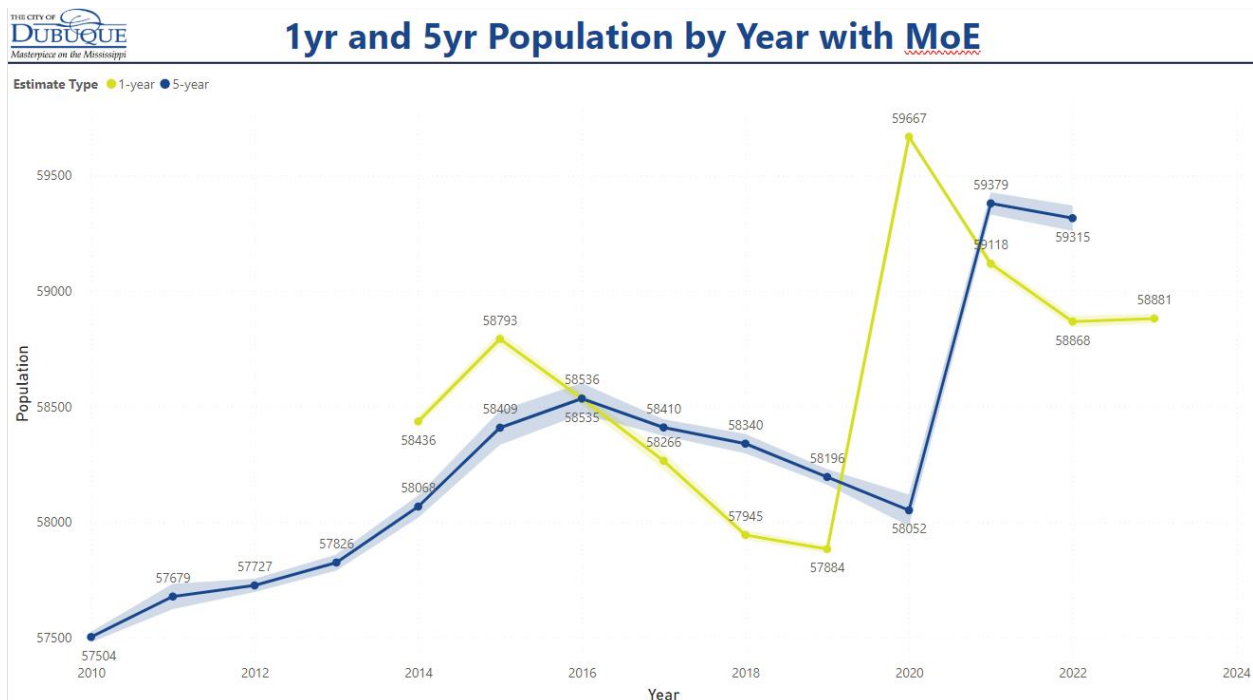
This section provides a look at demographics trends and analyzes the interplay between demographics and housing,

- Population
- Age
- National Origin
- Familial Status
- Other Vulnerable Populations
- Educational Attainment
- Race and Ethnicity
- Sex
- Persons With Limited English Proficiency
- Disability
- Poverty
- Employment

Population Trends

Since 2019, Dubuque has seen an increase in population. In 2021, the population of Dubuque rose to a high of 59,379 and over the past two years decreased by .08%.

Figure 2: City of Dubuque Population.



Source: 2014-2019, 2021-2023. 1-year ACS Supplemental Estimates.

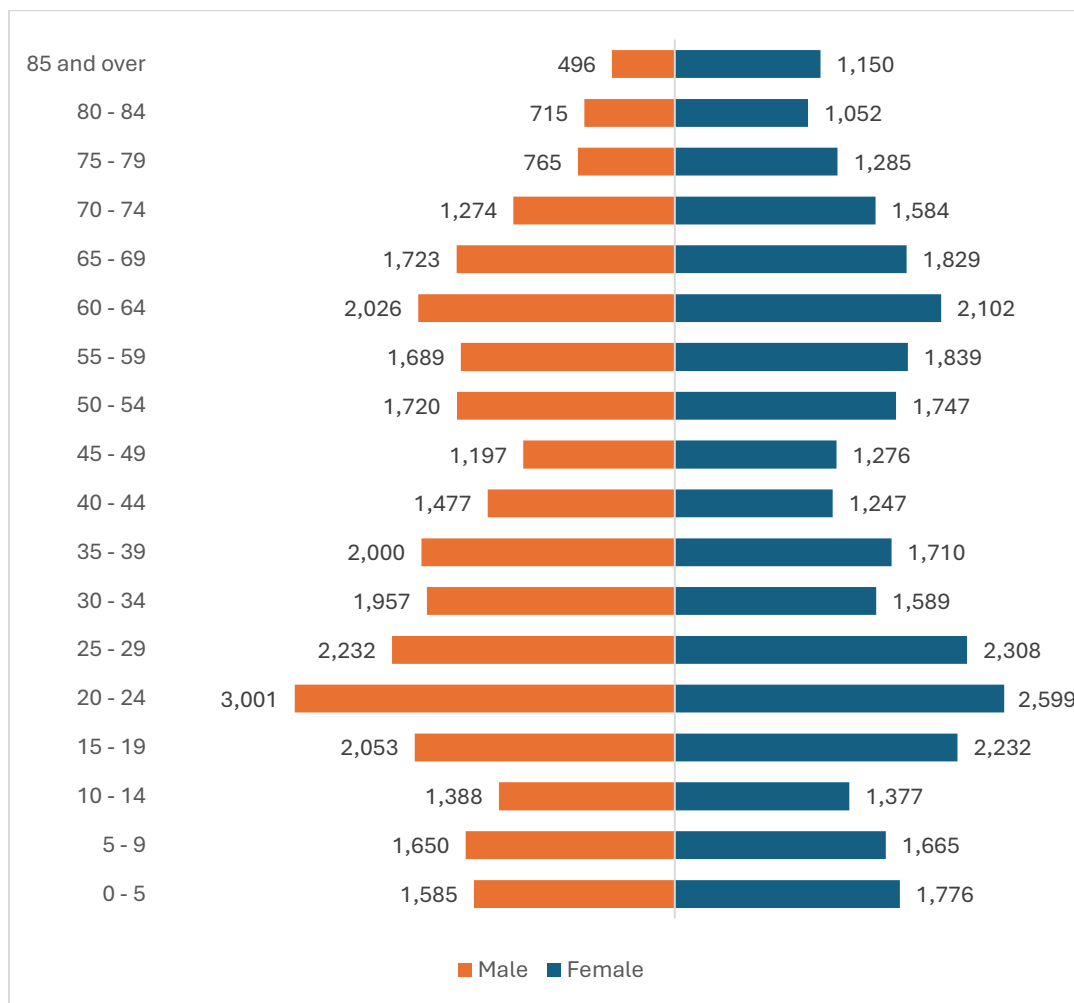
<https://data.census.gov/table?q=population&g=160XX00US1922395&d=ACS%201-Year%20Supplemental%20Estimates>

Age & Sex

Today, the growing disparity between income and home values, coupled with a housing shortage, makes homeownership increasingly unattainable for younger generations. Millennials face housing challenges unlike any previous generation.

The largest age group in the population is 25 to 34 years old, comprising 13.6%. The median age of the population is 37.9, but, this is not a statistically significant difference. The national median is 38.9.

Figure 3: Age & Sex.



Source: ACS 2018-2022 5-Year Estimates, Census Bureau

Females represent the majority of residents in Dubuque at over 51% of the population. They also account for 60% of the population of 65 years and older and make up a greater share of the community’s lower income (15% female, 10.0% male) group.

Race & Ethnicity

The population in Dubuque is predominantly White non-Hispanic with the second largest group in the community being Black or African American. Dubuque also has a large Marshallese population from the Marshall Islands.

Table 2: Race and Ethnicity

Race	2022 ACS Estimates	
White	54,733	92.3%
Black or African American	3,883	6.5%
American Indian and Alaska Native	342	0.6%
Asian	1,321	2.2%
Native Hawaiian and Other Pacific Islander	671	1.1%
Some Other Race	1,043	1.8%
Hispanic or Latino (of any race)	1,685	2.8%

Source: ACS 2018-2022 5-Year Estimates, Census Bureau <https://www.census.gov/newsroom/blogs/random-samplings/2024/04/updates-race-ethnicity-standards.html>

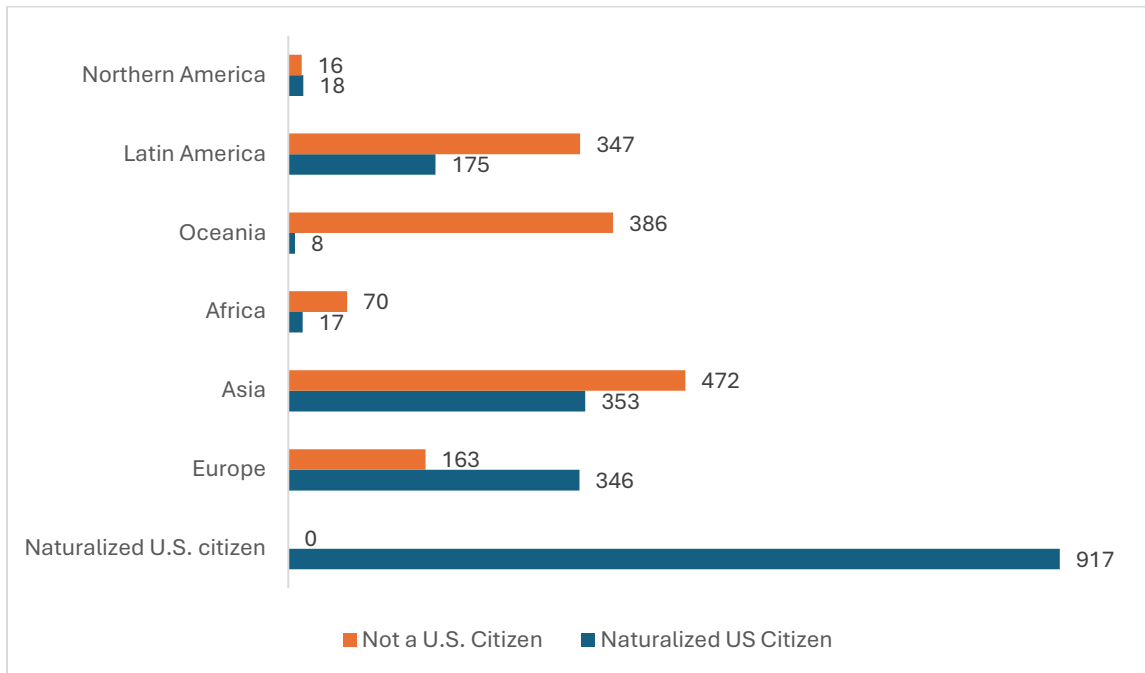
National Origin

In 2022, an estimated 4% of the people living in Dubuque are foreign-born, which is lower than the national percentage at 16%. In 2021, 2.78% of the population in Dubuque was foreign-born, which shows that the rate has been increasing slightly. Of the 2,371 residents who are foreign born, 917 are now naturalized US citizens and 1,454 are not US citizens.

Table 3: Foreign Born Population & Non-Citizens.

	Foreign born Population	Not a U.S. citizen
Naturalized U.S. citizen	917	0
Europe	346	163
Asia	353	472
Africa	17	70
Oceania	8	386
Latin America	175	347
Northern America	18	16
TOTAL	2,371	1,454

Figure 4: Foreign Born Population & Non-Citizens.



Source: ACS 2018-2022 5-Year Estimates, Census Bureau

Persons with Limited English Proficiency

The vast majority of Dubuque residents, 94.6%, speak only English. An estimated 2.4% of the population speaks Spanish, followed by 1.6% Asian and Pacific Island languages spoken while at home. Following English, Spanish is the second most common language spoken at home by Dubuque residents (2.4% of households or 1.6% of the total population). The language demographics of Dubuque have remained virtually unchanged between 2017 and 2022.

Familial Status

“Familial status” refers to the presence of at least one child under 18 years old and protects prospects and tenants who are pregnant or in the process of adopting a child. More than 6,000 (23.8%) households fit this profile in the City of Dubuque.

Table 4: Families and Households with Children.

2022 American Community Survey 5-Year Estimates	Total	Married-couple family household	Male householder, no spouse present, family household	Female householder, no spouse present, family household	Non-family household
Total households	25,198	10,596	1138	2438	11026
Average household size	2.2	2.89	2.96	3.14	1.26
FAMILIES					
Total families	14,172	10596	1138	2438	N/A
Average family size	2.87	2.87	2.66	2.95	N/A
SELECTED HOUSEHOLDS BY TYPE					
Households with one or more people under 18 years	23.8%	33.9%	49.9%	71.7%	0.8%
Households with one of more people 60 years and over	42.4%	47.8%	23.0%	26.1%	42.8%
Householder living alone	34.9%	N/A	N/A	N/A	79.7%
65 years and over	13.8%	N/A	N/A	N/A	31.6%
UNMARRIED-PARTNER HOUSEHOLDS					
Same sex	1.6%	N/A	N/A	N/A	N/A
Opposite sex	98.4%	N/A	N/A	N/A	N/A

Source: ACS 2018-2022 5-Year Estimates, Census Bureau

Disability

The Census Bureau defines “disability” as a long-term physical, mental, or emotional condition that hinders a person’s ability to perform daily activities, go outside alone, or work outside the home. Among the civilian noninstitutionalized population, 12.9% reported a disability. The disability rate for females was 12.9%, compared to 12.8% for males. The likelihood of having a disability varies significantly by age. As is generally the case, adults aged 75 and older have the highest rate (39.4%) of disabilities, something for Dubuque to continually assess as Boomers in the community age.

More than 7,000 residents (across all age groups) reported a disability in the City of Dubuque. In terms of disabilities by type, Ambulatory (6.6%) followed by Cognitive (4.7%) and Independent Living (5.3%) were the most common. Approximately 1,000 (32.6%) of Dubuque’s veterans also reported having a disability.

Race and Poverty

Minority groups living in Dubuque have the highest numbers of individuals experiencing poverty, with the highest percentage being Black or African American.

Table 5: Poverty Status by Race.

Race	Below Poverty Level	Percent Below Poverty Level
White alone	5,551	11.3%
Black or African American alone	914	42.7%
American Indian and Alaska Native alone	0	0.0%
Asian alone	37	4.1%
Native Hawaiian and Other Pacific Islander alone	259	38.7%
Some other race alone	84	18.0%
Two or more races	435	17.6%
Hispanic or Latino origin (of any race)	193	13.0%
White alone, not Hispanic or Latino	5,456	11.2%

Source: ACS 2018-2022 5-Year Estimates, Census Bureau.

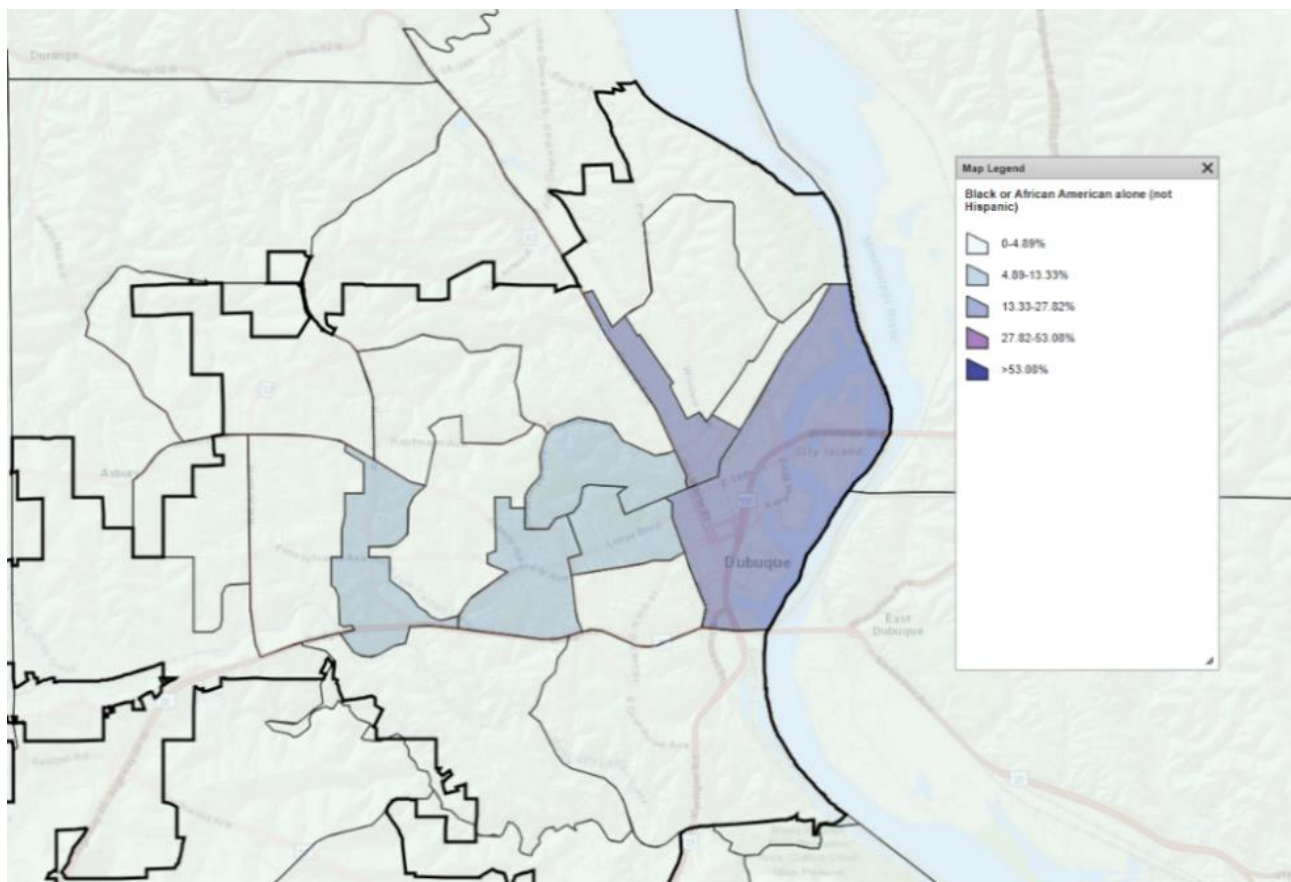
<https://data.census.gov/table/ACSST5Y2017.S1701?q=dubuque%20city%20poverty>

<https://data.census.gov/table/ACSST5Y2022.S1701?q=dubuque%20city%20poverty>

The largest community of color in Dubuque is African Americans. The poverty rate for Black or African American alone was 42.7% according to the 2018-2022 ACS 5-yr estimate. The 2013-2017 ACS 5-yr estimate showed 60.1%. This data however, had a large margin of error, indicating that there is not a significant statistical difference between the data collected in the 2013-2017 estimates and those of the 2018-2022 estimates.

The following maps show the concentrations of poverty in the City of Dubuque for Black or African Americans.

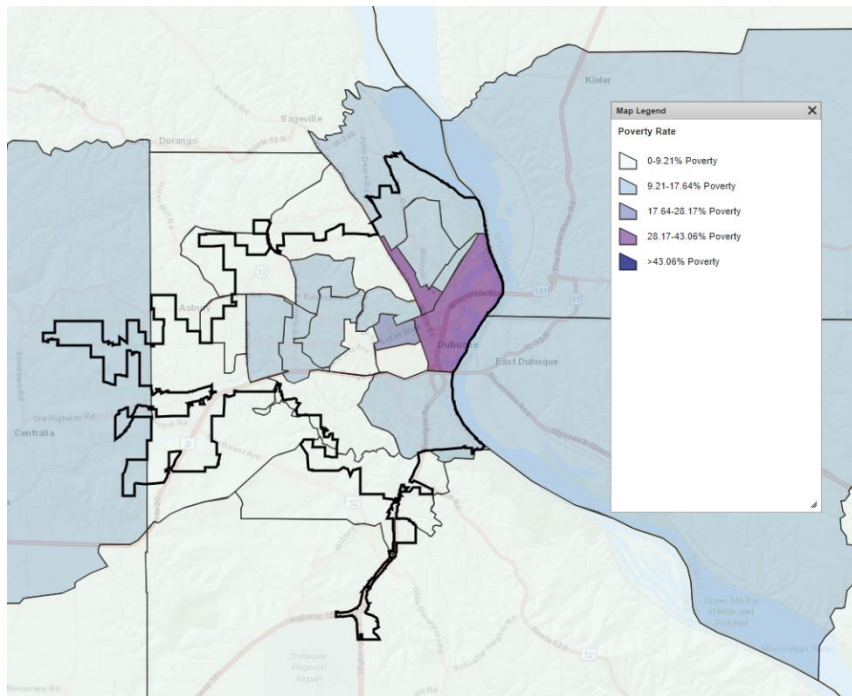
Figure 5: Map of Black or African American Alone.



Source: [CPD Map https://egis.hud.gov/cpdmaps/s](https://egis.hud.gov/cpdmaps/s)

Black or African American residents of Dubuque are most likely to live in the Downtown, easternmost part of the City in census tracts 1 and 5.

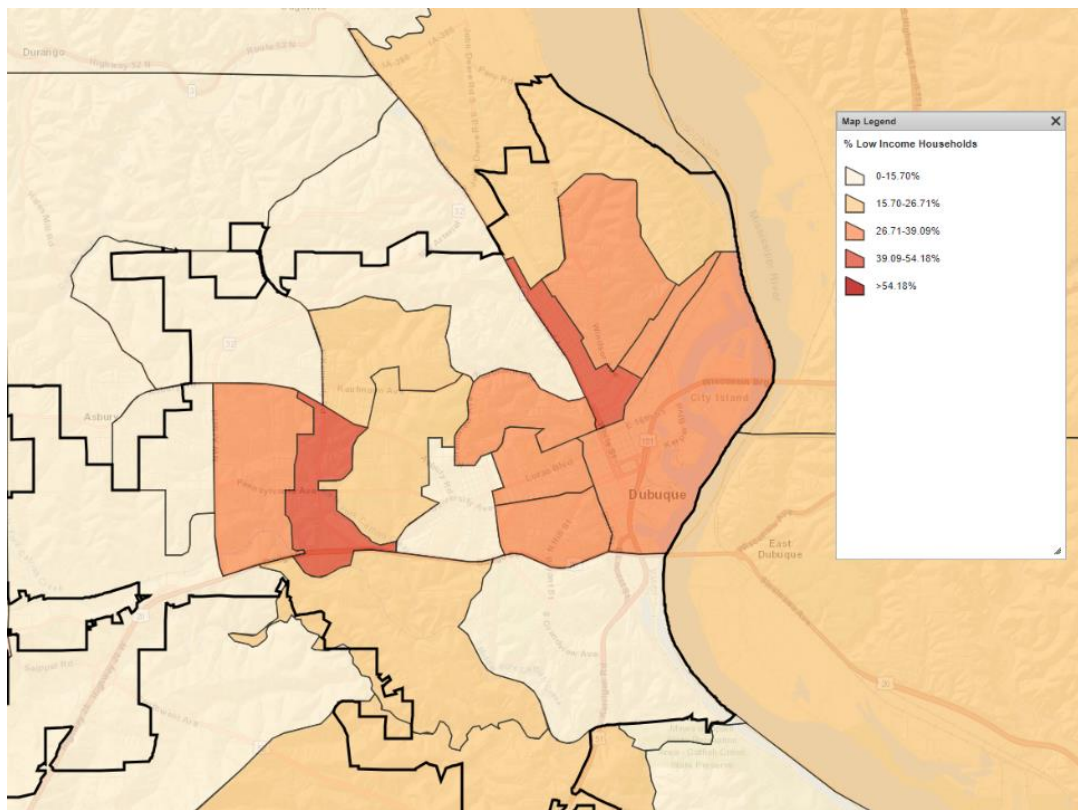
Figure 6: Map of Poverty Rate.



Source: [CPD Map https://egis.hud.gov/cpdmaps/s](https://egis.hud.gov/cpdmaps/s)

As can be seen in Figure 6, tracts 1 and 5 which have the highest poverty rate in the City are also home to the most Black or African American residents.

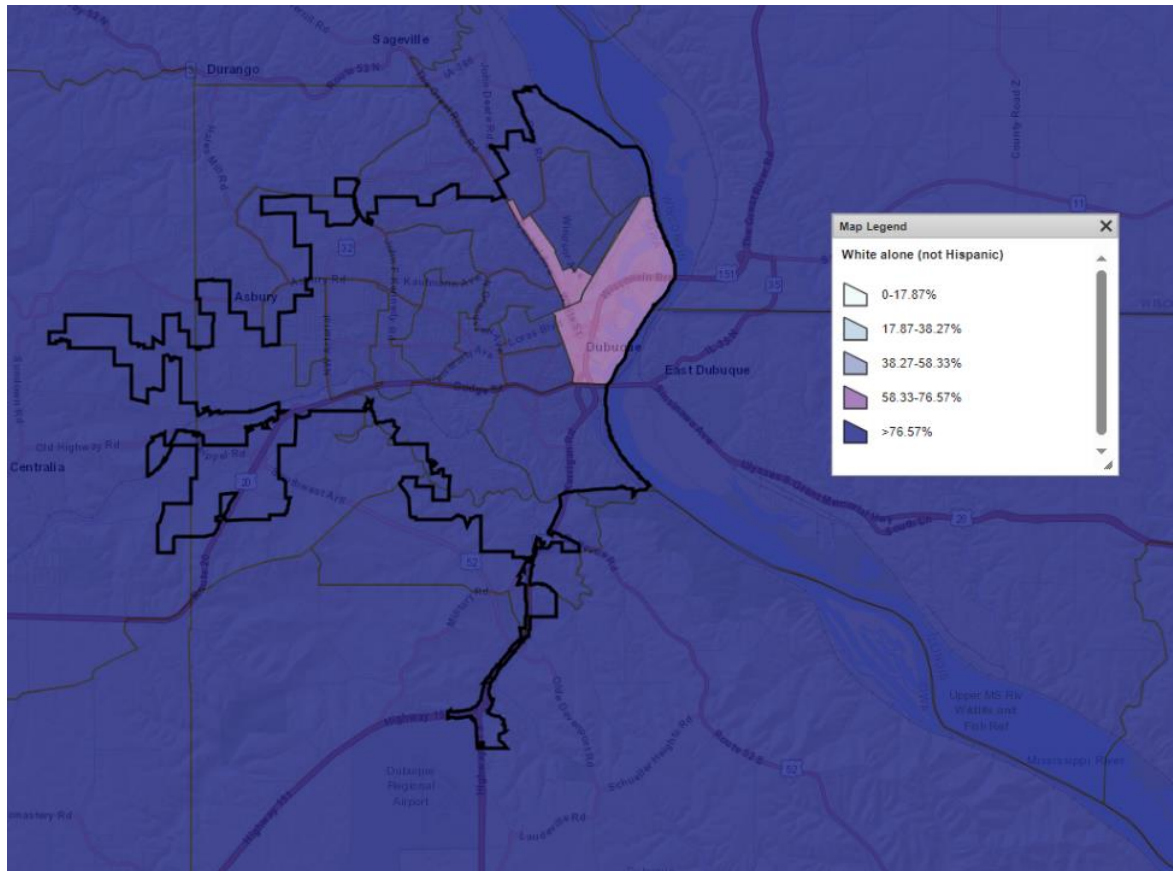
Figure 7: Map of Low-Income Households.



Source: CPD Map <https://egis.hud.gov/cpdmaps/s>

Low-income households are predominantly located in the eastern side of the City in census tracts 1, 3, 4, 5, 7.01, and 7.02. These tracts are also home to older housing stock and higher concentrations of rental units. Poverty rate and low income are similar, but different in the fact that poverty rate measures those below the poverty threshold, while low incomes is more broad and covers a range of individuals and families that are above the poverty threshold, but still face financial difficulties.

Figure 8: Map of White Population Alone.



Source:

CPD Map <https://egis.hud.gov/cpdmaps/s>

The majority of White residents live predominantly in northwestern areas of Dubuque. Those familiar with the City will note that these areas are located on top of the large hill that splits the City of Dubuque in half. As highlighted in Figure 8, the only parts of the City with lower numbers of White residents are tracts 1 and 5, which are neighborhoods lower in income and higher in poverty.

Homeless

High housing costs, low vacancies for affordable housing, and poor-quality housing are most associated with instability and increased risk of homelessness. Single female heads of households are more likely to be cost-burdened. According to Dubuque census data, 93% (708) of single head households that reported being below poverty status in the past 12 months were female, while only 7% (49) were male.

In June 2024, Community Solutions of Eastern Iowa (CSEI) counted 23 unsheltered residents in Dubuque, which was 7 more than counted in January 2023.

The homeless population, while not a protected class per se, is often disproportionately comprised of persons of color. The Consolidated Plan provides more information about homeless and the Continuum of Care.

Educational Attainment

Educational attainment is crucial for sustainable development, influencing an individual's economic status and determining their place of residence. The data reveals that 93.3% of residents in Dubuque had a high school education. 33.1% of Dubuque residents earned a bachelor's degree or higher, which is slightly less than the national level of 36.2%. 21% of residents aged 25 and older hold a bachelor's degree, matching the national average.

Table 6: Dubuque Educational Attainment.

Population 18 to 24	Estimate	Percent
Less than high school graduate	516	6.7
High school graduate (includes equivalency)	2131	27.5
Some college or associate's degree	3722	48.1
Bachelor's degree or higher	1376	17.8
Less than high school graduate	516	6.7
Population 25 and Over	Estimate	Percent
Less than 9th grade	791	2.0
9th to 12th grade, no diploma	1871	4.7
High school graduate (includes equivalency)	12957	32.4
Some college, no degree	7155	17.9
Associate's degree	3976	9.9
Bachelor's degree	8612	21.5
Graduate or professional degree	4627	11.6
High school graduate or higher	37327	93.3
Bachelor's degree or higher	13239	33.1

Source: ACS 2018-2022 5-Year Estimates, Census Bureau

Table 7: Degree Status by Race.

Race/Ethnicity	High School Graduate or Higher	Bachelor's Degree or Higher
White Alone	34,467	12,438
White Alone, Not Hispanic or Latino	34,241	12,268
Black Alone	1,120	232
American Indian or Alaska Native Alone	52	0
Asian Alone	454	189
Native Hawaiian and Other Pacific Islander Alone	269	0
Some Other Race Alone	143	19
Two or More Races	822	361
Hispanic or Latine Origin	468	229

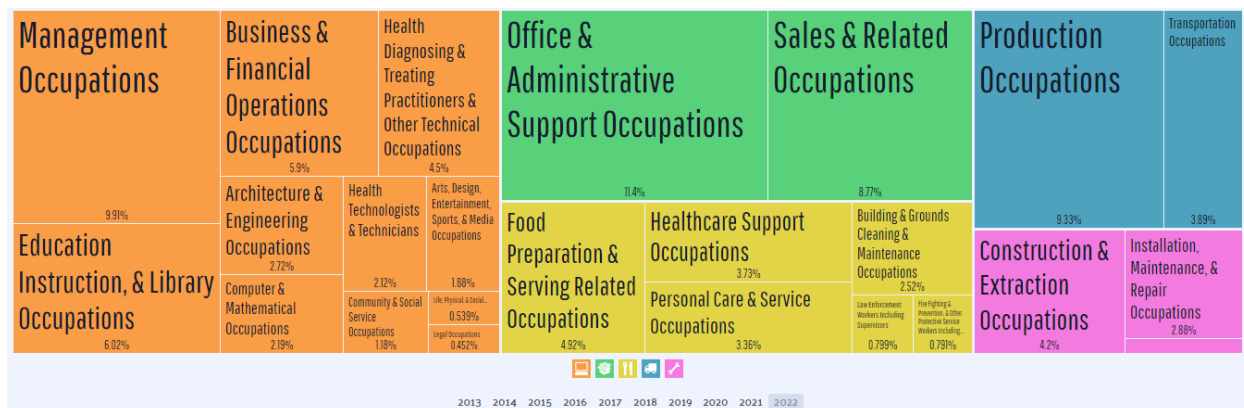
Source: ACS 2018-2022 5-Year Estimates, Census Bureau

The table above shows that in proportion to how many individuals of color live in Dubuque. On average less than 40% graduated High School or went on to graduate with a degree from higher education, compared to 62% of White residents.

Employment

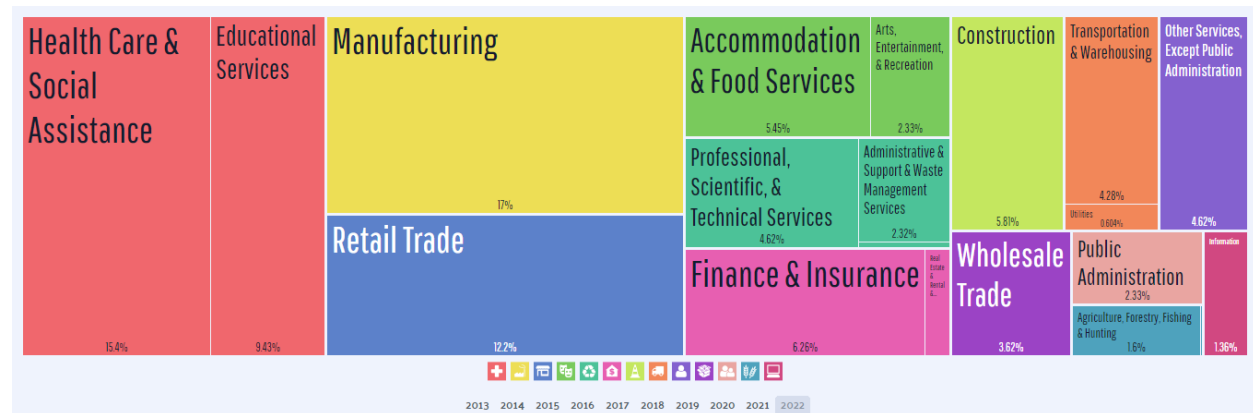
Dubuque's economy employs approximately 32,000 people. The largest industries are Manufacturing, Health Care & Social Assistance, and Retail Trade. The highest paying industries are Management of Companies and Enterprises and Public Administration. The income of males in Iowa is 1.34 times higher than the average income of females.

Figure 9: Employment by Occupation.



Source: <https://datausa.io/profile/geo/dubuque-county-ia>

Figure 10: Employment by Industry.



Source: <https://datausa.io/profile/geo/dubuque-county-ia>

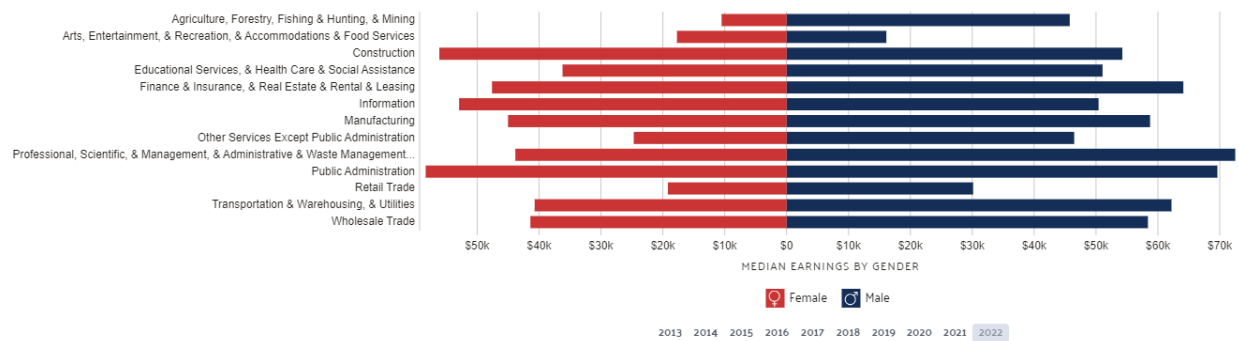
Table 8: Employment Status.

Race	Total	Labor Force Participating Rate	Employment/Population Rate
White alone	44,523	63.3	61.0
Black or African American alone	1,662	83.5	55.6
American Indian and Alaska Native alone	94	55.3	40.4
Asian alone	783	82.2	81.2
Native Hawaiian and Other Pacific Islander alone	402	57.7	57.7
Some other race alone	367	77.4	77.4
Two or more races	1,529	79.7	74.2
Hispanic or Latino origin (of any race)	1,151	70.9	70.1
White alone, not Hispanic or Latino	44,028	63.2	60.9
Poverty Status			
Below poverty level	4,174	59.6	47.2
At or above the poverty level	27,829	88.6	85.4
Disability Status			
With any disability	3,575	48.6	43.1

Source: ACS 2022 5-Year Estimates, Census Bureau

The table above shows that the Labor Force of Dubuque is quite diverse, with all but American Indian and Alaska Natives having an employment rate above 50.

Figure 11: Median Earnings by Industry.



Source: <https://datausa.io/profile/geo/dubuque-county-ia>

In Dubuque, median earnings for men and women differ across various industries. Women earn the most in public administration, construction, and information sectors. On the other hand, men have the highest median incomes in management, public administration, and finance, insurance, and real estate. Notably, both genders have high earnings in public administration, but men’s median income in this field is ten thousand dollars higher than that of women.

Table 9: Means of Transportation to Work by Race.

	White	Black or African American Alone	American Indian and Alaska Native Alone	Asian Alone	Native Hawaiian and Other Pacific Islander Alone
Car, truck, or van - drove alone	21,020	636	38	400	98
Car, truck, or van - carpooled	1,791	71	0	88	126
Public transportation (excluding taxicab)	262	58	0	64	0
Walked	765	84	0	77	0
Taxicab, motorcycle, bicycle, or other means	270	51	0	7	0
Worked from home	2,576	22	0	1	0

Source: ACS 2018-2022 5-Year Estimates, Census Bureau

Most residents in Dubuque travel to and from work alone by car. A larger percentage of Black or African American (10%), Asian (18%), and Native Hawaiian or Pacific Islander (56%) residents carpool to work in comparison to White commuters (8%).

Over 20% of Black or African American and Asian commuters also either walk, bike, or use some sort of public transportation to get to work in the City, while 5% or less White, American Indian, and Native Hawaiian or Pacific Islanders do.

Additional Iowa Protected Class Members and Other Vulnerable Populations

Under Iowa law, protected classes include Sexual Orientation and Gender Identity. Members of these protected classes and other vulnerable populations should also be acknowledged as residents likely to face greater challenges in securing safe, stable, and affordable housing.

Dubuque is making progress to address the affordable housing needs of Veterans and is home to 3,369 veterans of whom 1,888 are age 65 years or over and 184 are female Veterans.

The majority of Dubuque's veterans served during Vietnam War Era 1964-1975 (1,333). Dubuque is home to veterans who served during World War II, 1941-1946 (66), Korean War, 1950-1955 (290), First 1990-2001 (572) and Second Gulf Wars 2001 or later (576). Dubuque is also home to 3,369 veterans of whom 1,888 are age 65 years or over and 184 are female Veterans.

Note: The Second Gulf War era is more commonly called the Post 9/11 era to describe the world-wide scope of the Global War on Terror.

Housing Profile

This section provides an overview of housing, types, and locations of units. The four HUD-defined housing problems are addressed in several subsections, chief of which is the cost burden impediment.

Housing Overview

Since 2019, Dubuque's total housing units have increased from 23,620 to 25,198 in 2022, adding 1,578 units. However, vacancy rates remain a significant barrier, especially for those seeking affordable housing (housing that a household can pay for while still having money left over for other necessities). Vacant units are scattered throughout Dubuque, with the largest concentrations on the east side and downtown—areas noted in this document for high poverty and racial/ethnic diversity. Imagine Dubuque, the City of Dubuque's Comprehensive Plan includes strategies for expanding land use, the preservation of historic housing stock, and developing new housing units.

Housing Choice Voucher Program

The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program. Tenant-based vouchers are the process by which voucher recipients can find and receive help paying for rental housing on the private market. The City, as the Public Housing Authority, makes monthly housing assistance payments to landlords to help the voucher-holder households pay their rent each month. Participating households pay a minimum of 30% of their adjusted income for rent and utilities. Inadequate federal funding to meet the HCV need negatively affects Dubuque residents too, which is a barrier in itself.

Also, a nationwide issue, few landlords in Dubuque are willing to accept vouchers as rental applicants "*source of income*." In 2015, the City reported just 17% of property owners accepted HCVs; however, this data was found to be an unreliable assumption based on poor data. To obtain accurate data, the City of Dubuque passed an Ordinance January 22, 2019, that requires landlords report if and where they will accept HCVs to receive a rental license. In 2023, 32% landlords accept HCVs. Eighty landlords stated that they would need more information on the HCV program in order to decide whether they would be for or against it.

The Housing Choice Voucher Program in Dubuque offers affordable housing options for low (<50%) AMI and very low income (<30%) households.

Housing Types

Table 10: Units in Structure.

Number of Units	Estimate
1, detached	16,306
1, attached	1,110
2 apartments	1,381
3 or 4 apartments	1,821
5 to 9 apartments	1,379
10 or more apartments	3,747
Mobile home or other type of housing	9,471

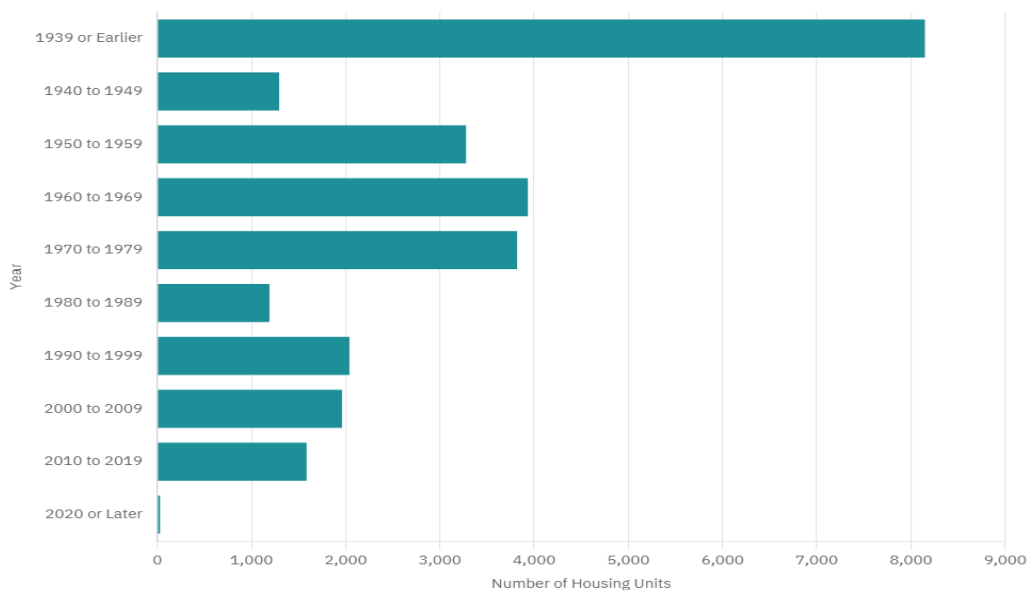
Source: Selected Housing Characteristics DP04 ACS 2018-2022 5-Year Estimates, Census Bureau

The majority of housing in the City of Dubuque is single-family detached. The City also has a large mobile home community.

Age of Housing Built

Dubuque's historic structures contribute to the community's charm and beauty. However, the aging housing stock presents challenges, with nearly 30% of the city's housing built in 1939 or earlier.

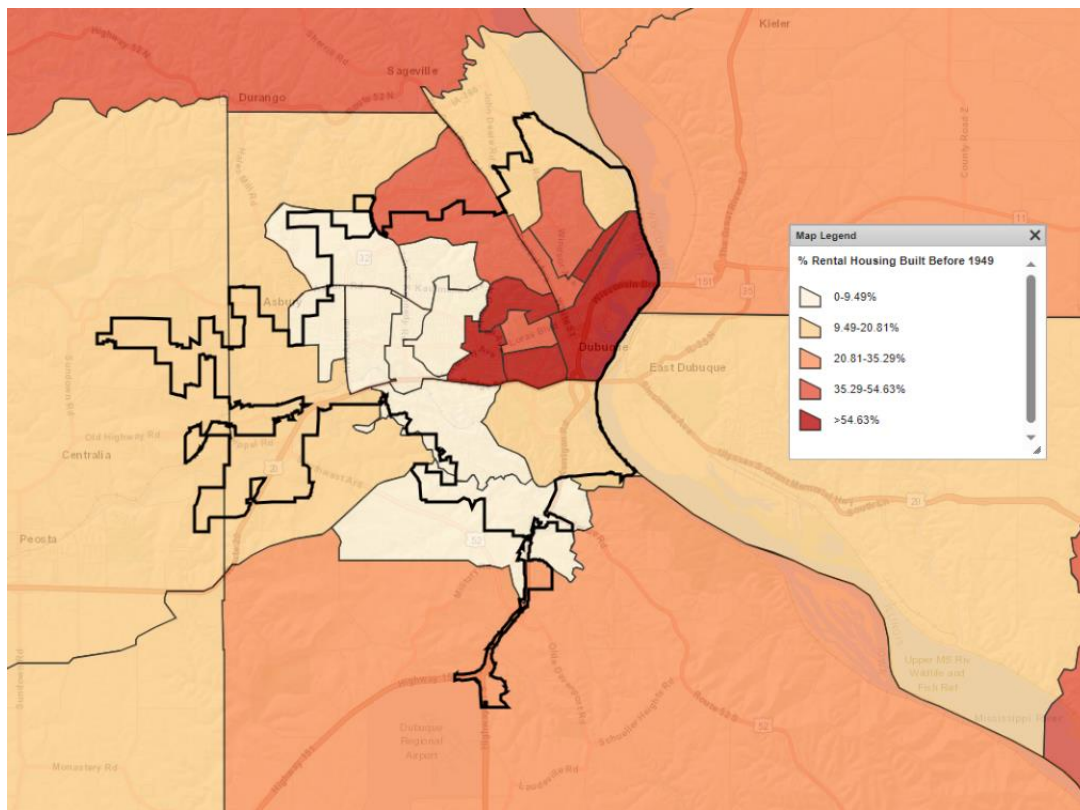
Figure 12: Year Structure Built.



Source: ACS 2018-2022 5-Year Estimates, Census Bureau

<https://data.census.gov/table/ACSDP5Y2022.DP04?q=dubuque%20city%20housing%20units&moe=false>

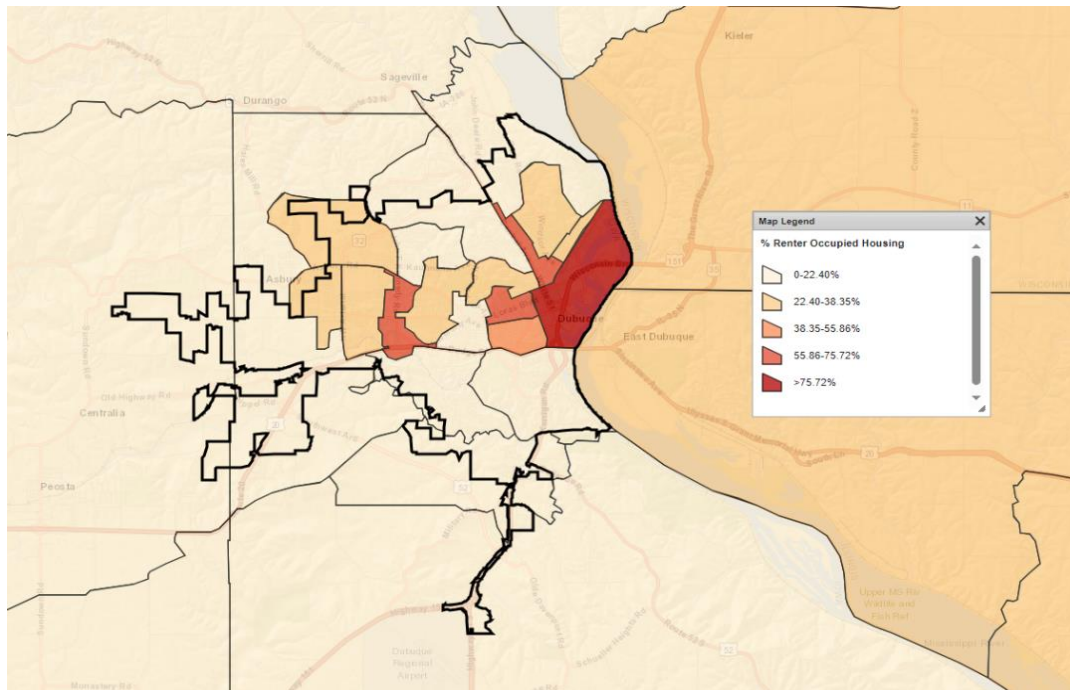
Figure 13: Rental Housing Built Before 1949.



Source: [CPD Maps \(hud.gov\)](https://cpd.maps.hud.gov/)

Over 50% of the rental units in census tracts 1, 3, and 7.02 were built before 1949. This does not immediately mean that they are in poor condition, but they are more prone to having issues due to their age and require more maintenance, which can be expensive for both the owner and renters.

Figure 14: Renter Occupied Housing.



Source: [CPD Maps \(hud.gov\)](https://cpdmaps.hud.gov/)

The majority of renter occupied housing is located within tracts 1,5, and 7.01 in Downtown Dubuque.

Ownership by Race

Table 11: Number of Owner-Occupied Housing Units by Race.

Race	Owner-occupied Housing Units	Owner-Occupied by Race Percentage
White	15817	68%
Black or African American	147	16%
American Indian and Alaska Native	16	42%
Asian	110	32%
Native Hawaiian and Other Pacific Islander	16	14%
Some other race	29	30%
Two or more races	186	39%
Hispanic or Latino origin	126	43%

Source: ACS 2018-2022 5-Year Estimates, Census Bureau

Table 11 shows that there is a much higher number of White owner-occupied housing units than any other race in Dubuque. While the population of Dubuque is predominantly White, when the total population for other races is compared to these numbers, the percentage of home ownership for people of color is very low in comparison.

Housing Problems

The four HUD-defined housing problems are: (1) Incomplete kitchen facilities, (2) Incomplete plumbing facilities, (3) more than 1 person per room (overcrowding), and (4) cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

The cost burden is the ratio of housing costs to household income. For renters, housing costs are measured by gross rent (contract rent plus utilities). For homeowners, housing costs (select monthly owner costs) are mortgage payments, utilities, association fees, insurance, and real estate/property taxes. HUD defines cost-burdened families as those who pay more than 30% of their income for housing and may have difficulty affording necessities such as food, clothing, transportation, and medical care. A severe cost burden is defined as paying more than 50% of one's income on rent.

HUD includes overcrowding as a housing problem as it correlates to more health issues and accidents. In Dubuque, 99% of owner-occupied units and 98.2% of renter-occupied units have one person per room.

Table 12: Housing Problems.

Housing Problems Overview 1	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	2,725	4,385	7,110
Household has none of 4 Housing Problems or cost burden not available, no other problems	13,420	4,320	17,740
Total	16,145	8,705	24,850
Severe Housing Problems Overview	Owner	Renter	Total
Household has at least 1 of 4 Severe Housing Problems	880	2,825	3,705
Household has none of 4 Housing Problems or cost burden not available, no other problems	15,265	5,880	21,145
Total	16,145	8,705	24,850

Source: [Consolidated Planning/CHAS Data](#) | HUD USER

The CHAS data in Table 12 reveals that 28% of both owners and renters in the City of Dubuque live in a household with at least 1 of 4 housing problems identified by HUD. These problems are

identified as: (1) Incomplete kitchen facilities, (2) Incomplete plumbing facilities, (3) more than 1 person per room (overcrowding), and (4) cost burden greater than 30%.

Cost Burden and Income

HUD Area Median Family Income (HAMFI) Classification

Extremely Low – Income <30%
Very Low – Income <50%
Low – Income <80%
Low – and Moderate Income <100%

An owner or renter's income is closely correlated to housing problems. Inherently, cost burden is going to affect those in poverty more readily. HUD's Area Median Family Income (HAMFI) is the measure of median income by household calculated by HUD-determined housing markets, largely based on metropolitan statistical areas. While HAMFI does not provide the precision of a County Median Income or City Median Income, HAMFI offers HUD the ability to adjust median income by known household size in the Comprehensive Housing Affordability Strategy (CHAS) tabulations, providing more consistent data metrics across demographics.

Table 13: Housing Problems for Renters.

Income by Housing Problems (Renters only)	At least 1 of 4	None of 4 housing problems or cost burden not available, no other problems	Total	Percentage of Renters with At Least 1 of 4 Housing Problems
<= 30% HAMFI	1,940	400	2,340	82%
>30% <=50% HAMFI	1,380	375	1,755	78%
>50% <=80% HAMFI	745	1,185	1,930	38%
>80% <=100% HAMFI	105	745	850	12%
>100% HAMFI	215	1,620	1,835	11%
Total	4,385	4,320	8,705	50%

Source: [Consolidated Planning/CHAS Data](#) | HUD USER

The table above shows that about 50% of rental households in Dubuque have at least one of four problems: (1) Incomplete kitchen facilities, (2) Incomplete plumbing facilities, (3) more than 1 person per room (overcrowding), and (4) cost burden greater than 30%. Of these renters that are facing one or more of these housing problems, 75% of them would be classified as being low to extremely low income and make less than 50% of the area median family income.

Table 14: Housing Problems for Owners.

Income by Housing Problems (Renters only)	At least 1 of 4	None of 4 housing problems or cost burden not available, no other problems	Total
<= 30% HAMFI	795	175	970
>30% <=50% HAMFI	670	665	1,330
>50% <=80% HAMFI	880	2,110	2,990
>80% <=100% HAMFI	200	1,710	1,910
>100% HAMFI	180	8,765	8,945
Total	2,725	13,420	16,145

Source: [Consolidated Planning/CHAS Data | HUD USER](#)

Table 14 shows that about 17% of owner-occupied households struggle with at least one of the following problems: (1) Incomplete kitchen facilities, (2) Incomplete plumbing facilities, (3) more than 1 person per room (overcrowding), and (4) cost burden greater than 30%.

Housing problems are most prevalent in areas with the highest poverty levels. This places significant financial strain on residents, making it difficult to afford basic necessities. The situation worsens when large, unexpected expenses, such as car repairs, arise.

The City has been addressing the aging housing stock issue through CDBG funds and partnerships. Additionally, for over a decade significant investments have been made in the Washington Neighborhood. Investment and preservation strategies, including the use of CDBG funds, Low Income Housing Tax Credit (LIHTC) and other funding is a community strength.

An example of this would be the Housing Investment Pilot Program, part of the Central Avenue Corridor Initiative, which aims to create more upper story residential units along the corridor. The City of Dubuque's Central Avenue Corridor Housing Investment Pilot Program incentivizes housing improvement and creation along the Central Avenue corridor by offering 10-year forgivable loans of \$10,000 per unit for projects that enhance or create quality, affordable residential housing on Central Ave. from 11th to 22nd Streets.

Figure 15: Map of project-based and LIHTC properties.

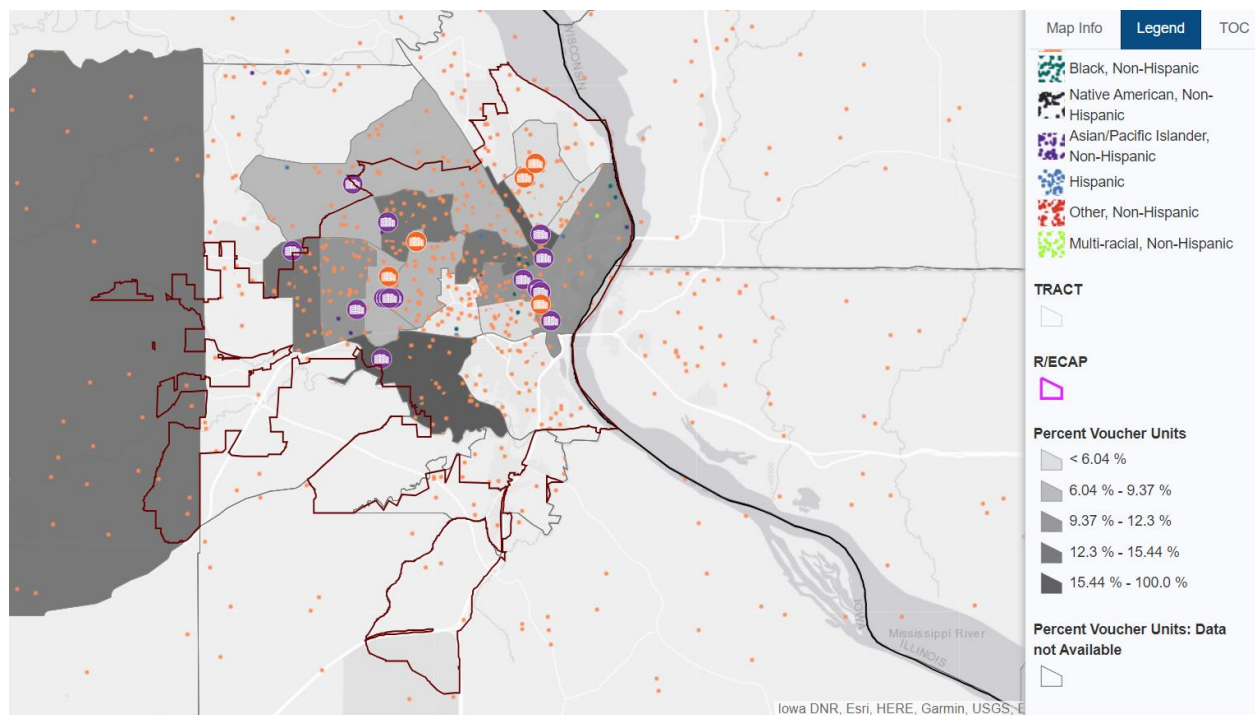


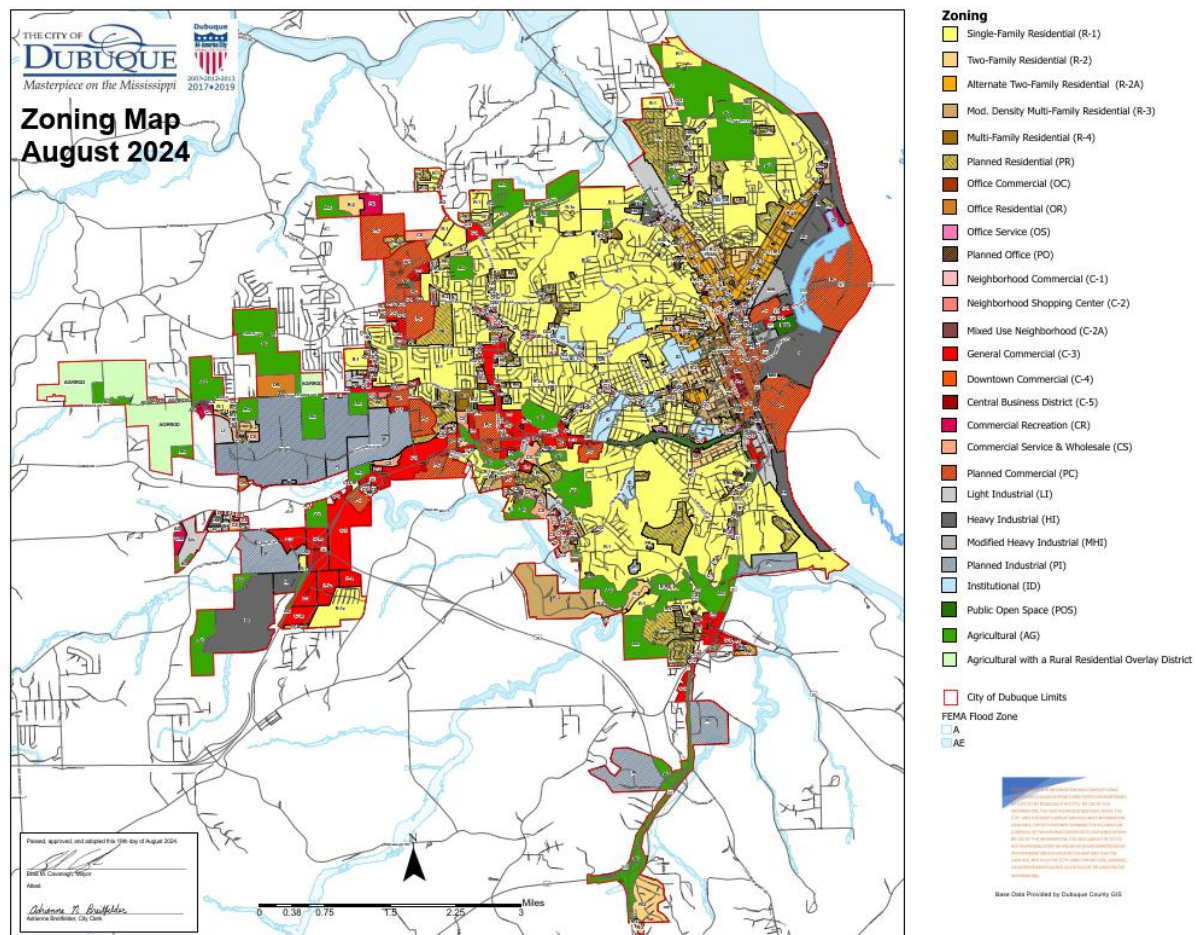
Figure 15 highlights the locations of project-based and LIHTC properties (in purple). Note that there is no public housing in Dubuque.

The mapping patterns reveal that publicly assisted housing, especially for Housing Choice Voucher program tenants, remains concentrated in older housing stock. As consistently highlighted in this document, the most vulnerable residents are found living in the oldest and most at-risk housing in the City.

Zoning

Within Dubuque city limits, the Zoning map highlights areas currently vacant and developable for residential use based on the 2024 zoning designation. Because there are fewer units available than households in need for those who make less than 30% Household Area Median Family Income, land use and development decisions will make affordable housing a priority. The following map details the City Council-approved future land use map that Imagine Dubuque strategies build upon.

Figure 16: Dubuque Zoning Map.



Source: [Zoning Map | Dubuque, IA - Official Website \(cityofdubuque.org\)](https://cityofdubuque.org)

Imagine Dubuque Strategies for Expanding Affordable Housing

The following are recommendations taken from Imagine Dubuque and show their completion status.

Figure 17: Imagine Dubuque Housing Recommendations.

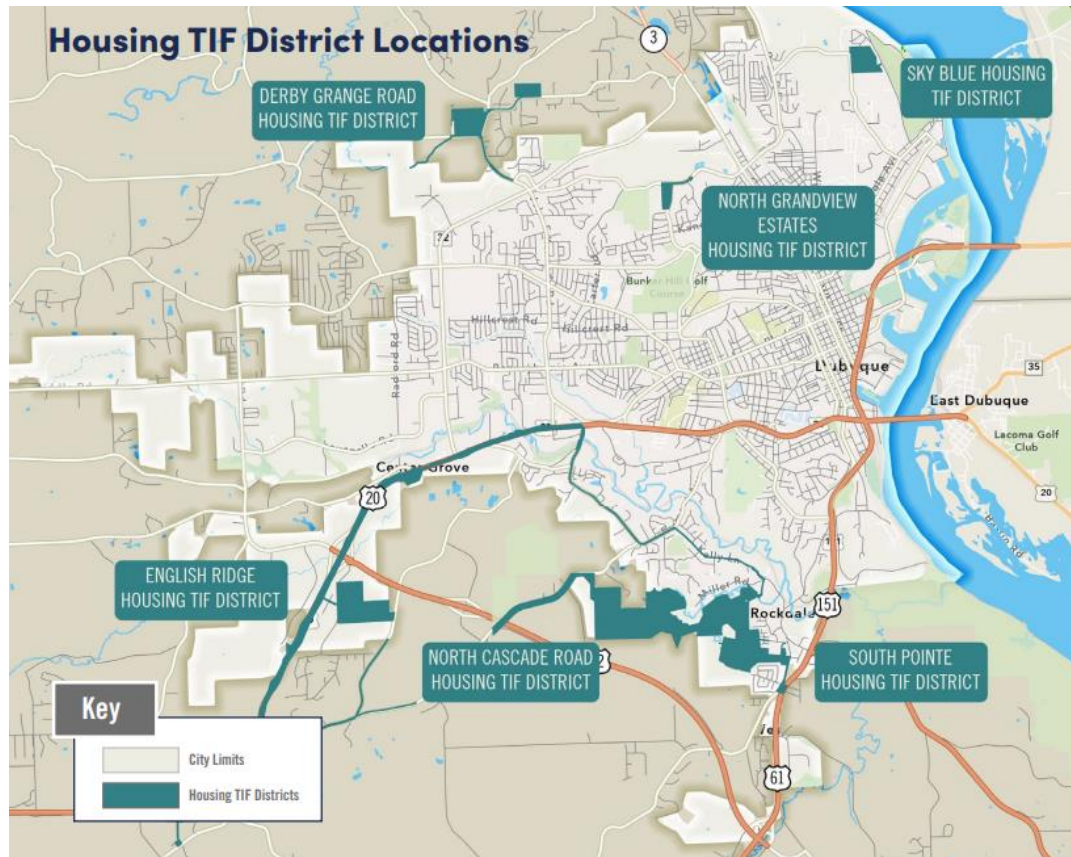
Housing Recommendations	
Name	Status
Support the City's inspection programs as well as the Green and Healthy Homes Initiative.	On Track
Monitor affordability and housing stress, an important health indicator, annually.	On Track
Look to increase wages and self-sufficiency opportunities in the community to make housing more attainable.	Off Track
Adopt and implement a mix of educational/outreach programs to increase housing provider participation in Housing Choice Voucher program.	On Track
Adopt and implement a mix of financial incentives/policies for creation of Housing Choice Voucher units throughout community.	On Track

Source: [Imagine Dubuque | Dubuque, IA - Official Website \(cityofdubuque.org\)](https://cityofdubuque.org/)

TIF Districts

Dubuque has six TIF districts. Each district has an Urban Renewal Plan that describes the specific use of tax increment funds, such as providing tax rebates, installing public infrastructure, or other planned expenditures. These Housing TIF Districts, consistent with state law, currently set aside approximately 38 percent of project cost increment, thus providing funding for the benefit of low- and moderate-income family housing opportunities anywhere in the City of Dubuque.

Figure 18. Dubuque Housing TIF Districts.



Source: [Tax-Increment Financing | Dubuque, IA - Official Website \(cityofdubuque.org\)](https://cityofdubuque.org/tax-increment-financing)

More information about these districts can be found on the Dubuque City website: [Tax-Increment Financing | Dubuque, IA - Official Website \(cityofdubuque.org\)](https://www.cityofdubuque.org/financing)

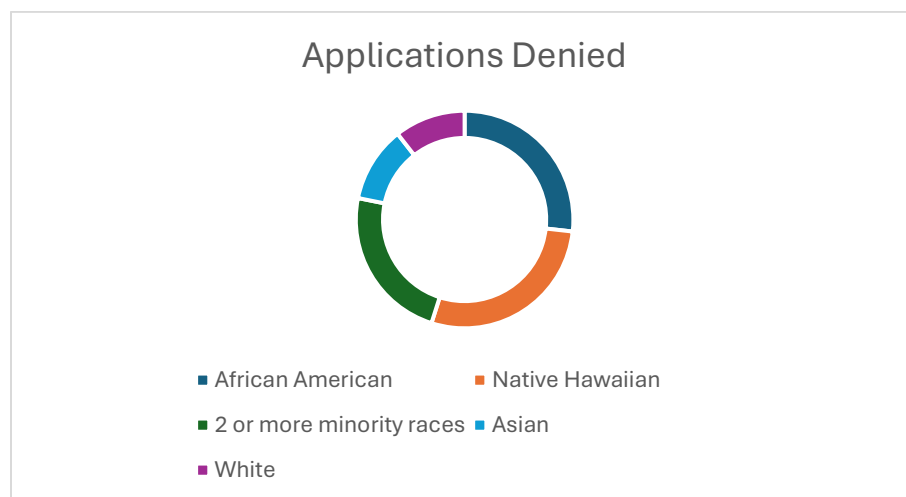
Potential Private Sector Discrimination

The following prohibited practices may not currently be occurring in Dubuque, but they are important to be vigilant about:

- Redlining, refusing to extend home loans/insurance or offering less favorable terms to someone based on the race of their neighborhood.
- Blockbusting, persuading owners to sell property cheaply based on fear that people of another race will move into the neighborhood, and thus profiting by reselling at a higher price.
- Steering, housing providers guide prospective buyers/renters towards or away from certain neighborhoods based on race.

Among home loan applicants of color, the ability to achieve homeownership is impeded by higher rates of mortgage application denials. Black and Hispanic households in Iowa were denied mortgages at higher rates than White households, even when controlling for income. Higher cost loans were more prevalent among lower income households than upper income households. According to Home Mortgage Disclosure Act (HMDA) nationwide data (2023), 5 out of every 1000 people have their Home Mortgage application denied in Dubuque County. In 2023, 38% of African American applications were denied, 40% of Native Hawaiian were denied, 33% of persons 2 or more minority races were denied, and 16% of Asian applications were denied. In comparison, 15% of White applications were denied.

Figure 19. Loan Application Denial by Race

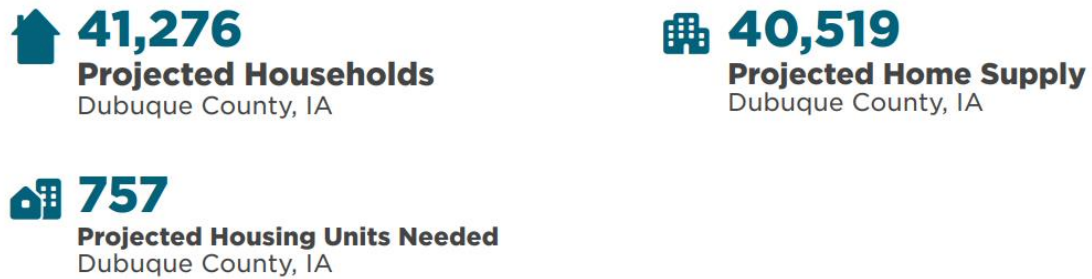


The data does not include some legitimate credit risk considerations for loan approval and loan pricing decisions. There is a large significant percentage of loans where race and ethnicity data is not available, although race and ethnicity data is reported for the majority of loan types.

Housing Forecast

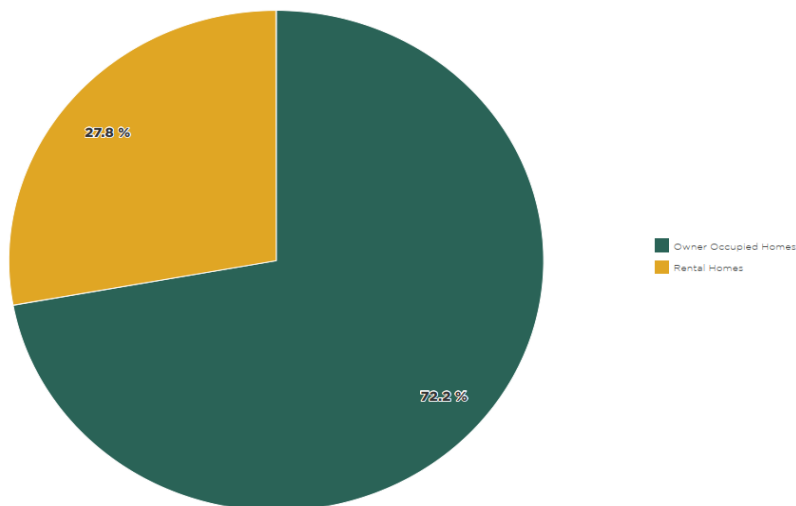
The Dubuque, Iowa Housing Needs Forecast Model predicts that in 2030 there will be a projected 41,275 households.

Figure 20. 2030 Dubuque County Housing Forecast



Sources: Housing Needs Forecast Model 2030

Figure 21. 2030 Projected Home Demand by Category

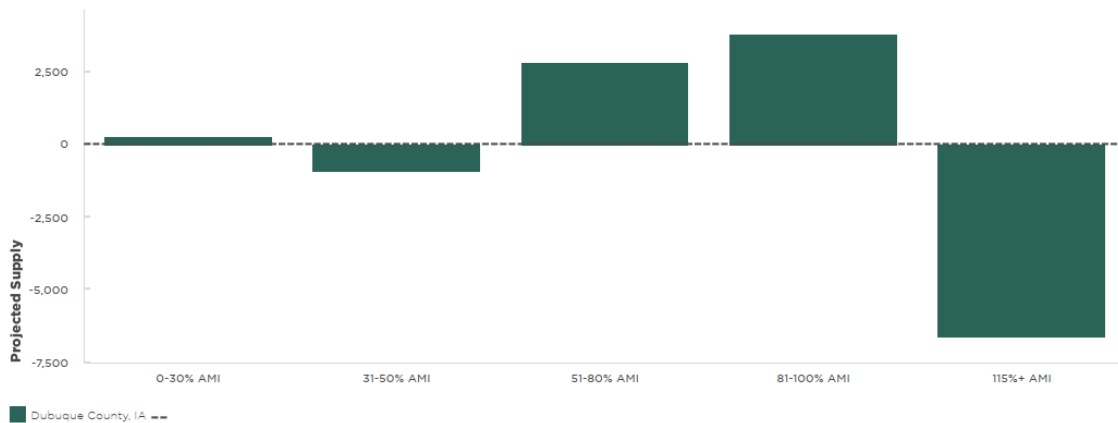


Dubuque County, IA

Sources: Housing Needs Forecast Model 2030

The owner and renter-occupied housing split in Dubuque is expected to stay about the same, at around 30% rental units and 70% owner units being supplied.

Figure 22. 2030 Projected Owner-Occupied Home Supply by AMI



Sources: Housing Needs Forecast Model 2030

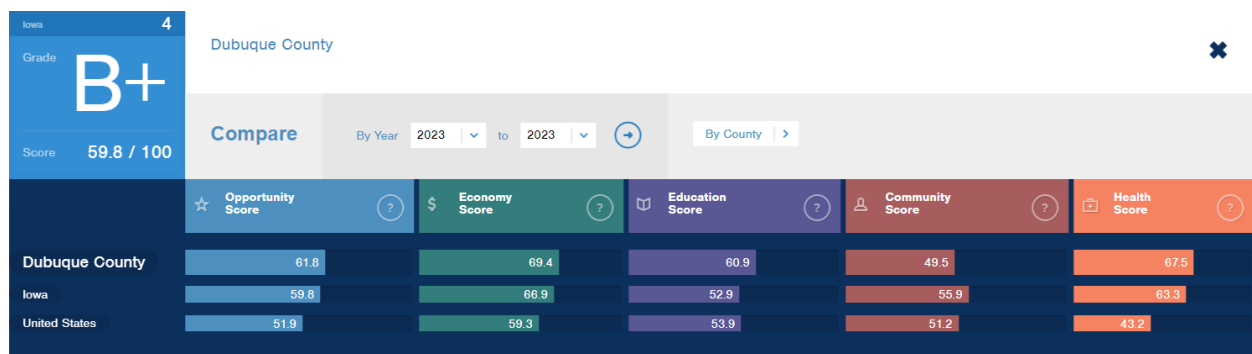
The forecast predicts an increase in homes that would fall between 51-100% AMI (area median income) and a decrease in those above 100%. This means Dubuque would be looking to develop more affordable housing that would fall between 31-50% AMI and more expensive options for those that fall into the 115%+ AMI column.

Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors. HUD refers to these factors within communities as ‘areas of opportunity.’ To thrive one needs living wages, good schools, affordable housing, efficient public transportation, safe streets, good services, adequate parks, and full-service grocery stores. While not mentioned by HUD, childcare has increasingly become a factor that impacts one’s ability to thrive.

HUD has developed a series of indices to help inform communities about segregation in their jurisdiction and region, as well as about disparities in access to opportunity. Each opportunity index is percentile ranked on a 0–100 scale, with a score closer to 100 indicating a higher level of opportunity.

Figure 23: Dubuque County Opportunity Index.



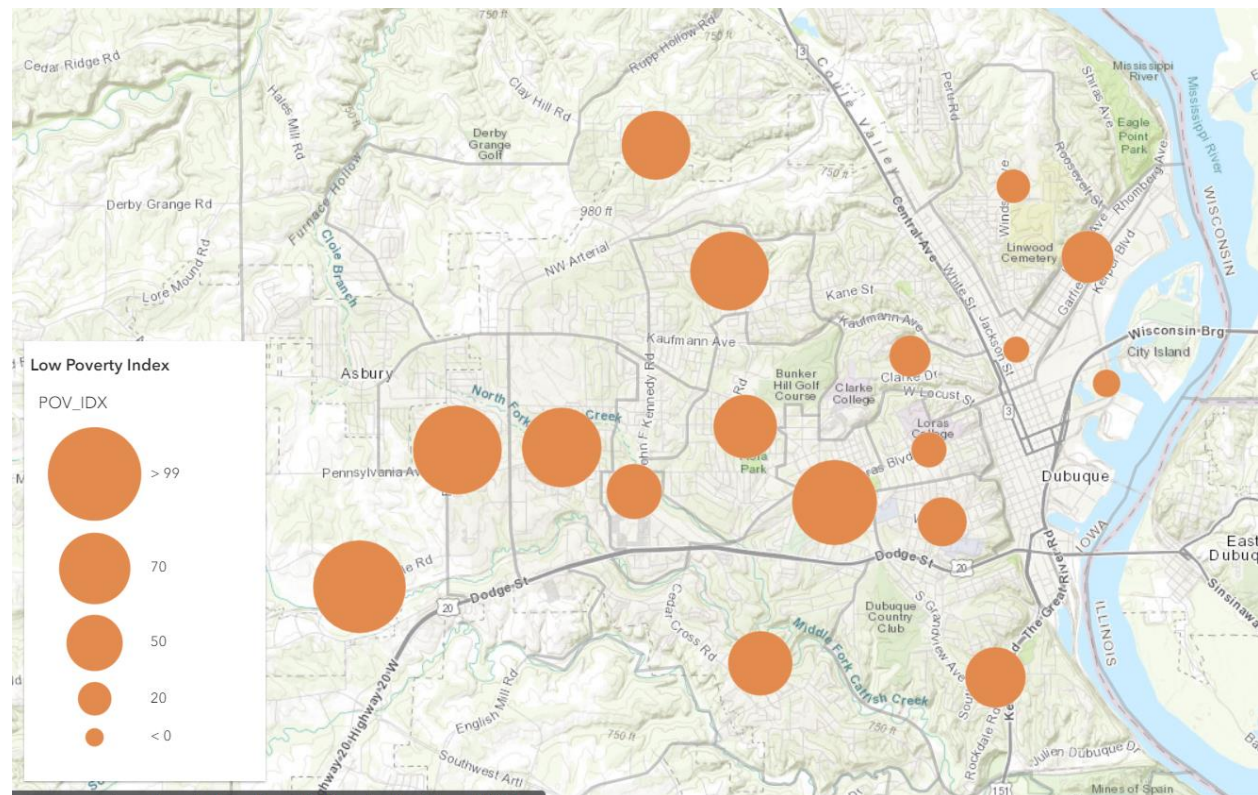
Source: <https://opportunityindex.org/>

According to HUD Exchange, “The Opportunity Index is an annual report developed by Opportunity Nation, a campaign of the Forum for Youth Investment, and Child Trends.” The Opportunity Index shows how Dubuque County is doing in terms of economy, education, community, and health in comparison to the State of Iowa and United States as a whole. Dubuque County scored a B plus and beat out the United States and State of Iowa in every category except for community, where it fell short due to having less grocery store and produce vendors per 10,000 people and having no data available for voter registration and volunteering.

Low Poverty Index & Income

Poverty significantly impacts access to opportunity. Dubuque’s poverty rate of 13% is both higher than the county (9.2%) and the state (11.3%). The Low Poverty Index is based on the poverty rate and captures poverty in a given neighborhood with the poverty rate determined at the census tract level. Poverty Index values are inverted meaning the higher the score, the less exposure to poverty in a neighborhood.

Figure 24: Low Poverty Index Map.

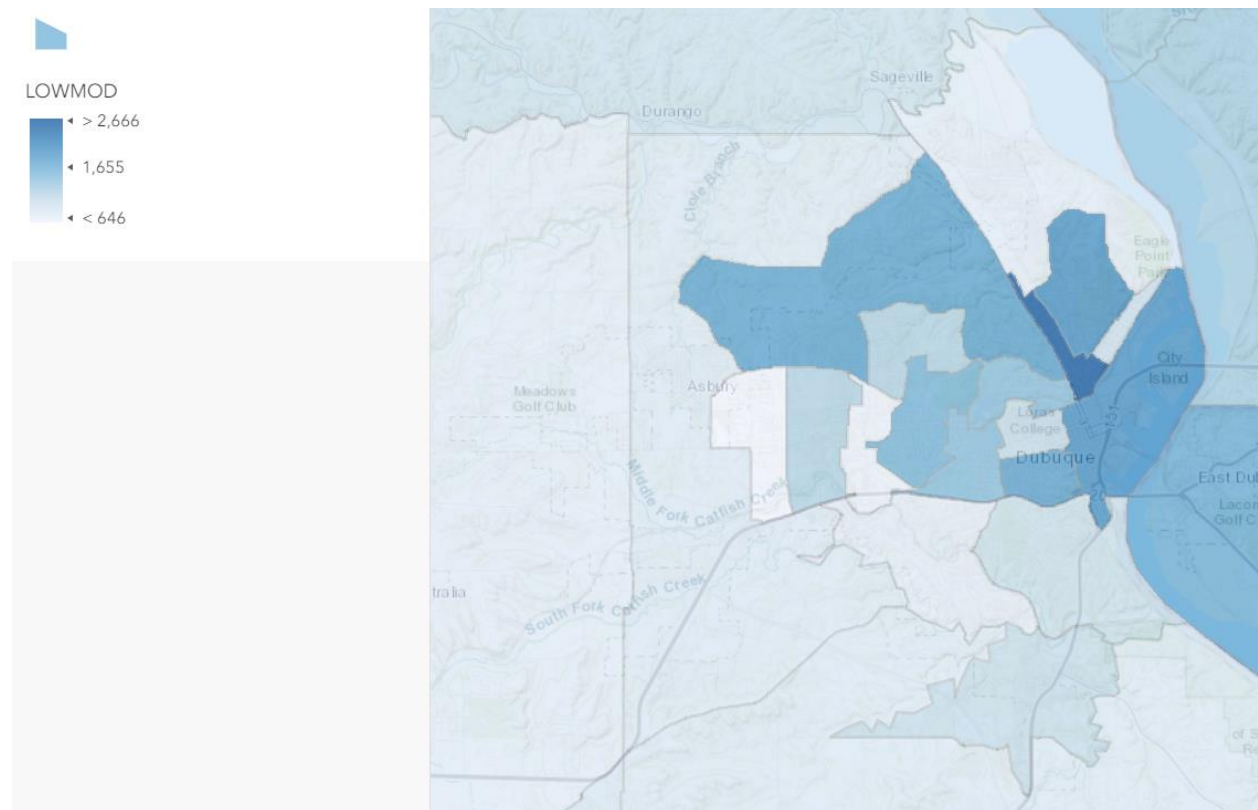


Source: [Low Poverty Index | HUD Open Data Site \(arcgis.com\)](#)

The Poverty Index map above shows the poverty rate in each tract of Dubuque. The smaller circles indicate where areas of poverty are present. As can be seen here, tracts 1 and 5 in Downtown Dubuque have the highest rates of poverty in the City.

The median income for the City of Dubuque is \$59,317 (ACS 2022). For White Alone householders, the median income is \$ 64,949 and for African American householders it is \$ 38,262. The 20% Gender Income Gap (females less than males) disparately impacts all households but especially female-led households (5,946) which are nearly 42% of the percent of total family households (14,172) in Dubuque. Female-led households with no spouse present had a median income of \$41,411 and \$38,180 for those with children under the age of 18.

Figure 25: Low to Moderate Income Population by Tract.



Source: [Low to Moderate Income Population by Tract | HUD Open Data Site \(arcgis.com\)](#)

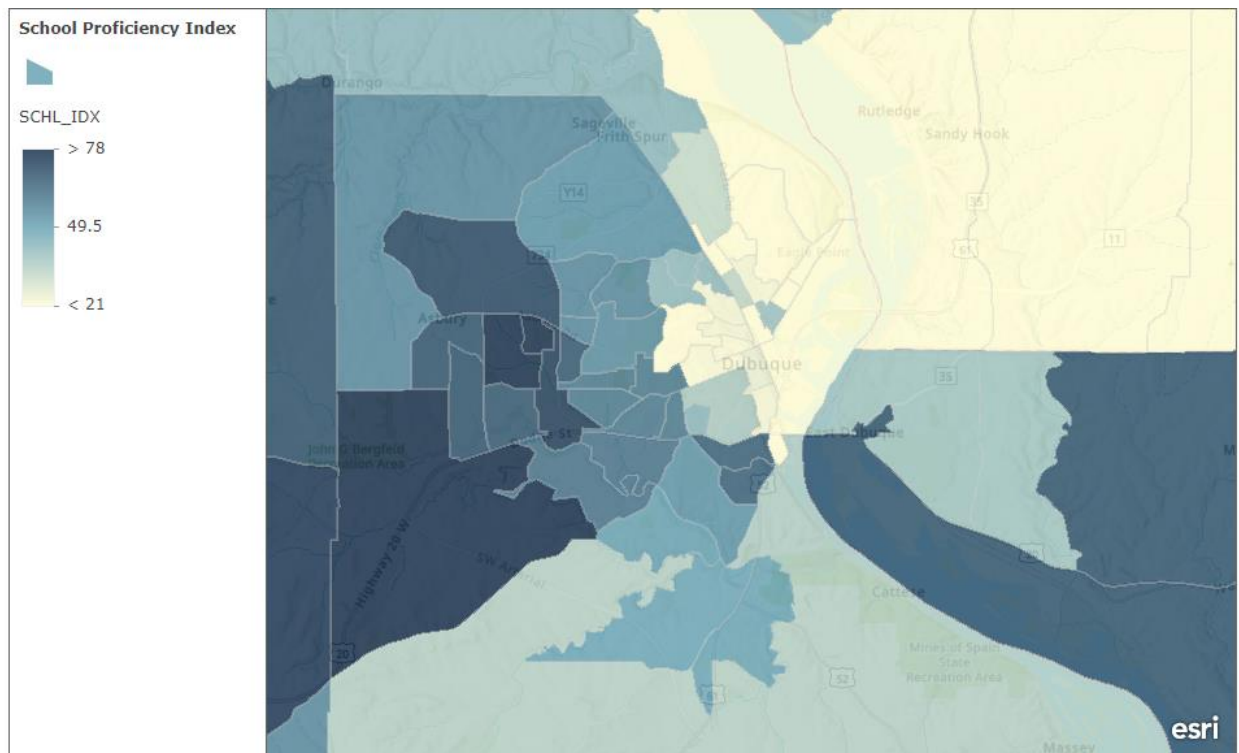
Areas of lowest income (dark blue) in Dubuque are found in Tract 5, which also reflects Figure 24 that showed this area being the highest in poverty. Low and moderate income tracts show us where the median family income is less than 50% (Low) or 50%-80% (Moderate) less than the Area Median Income in Dubuque.

School Proficiency Index

School proficiency is viewed by HUD as an indication of the quality of education that is available to residents of an area. High quality education is thought to be a vital community resource that may lead to more opportunities and improved quality of life. Importantly, Dubuque uses a neighborhood schools' model, meaning that schools are typically populated with children from surrounding residences and neighborhoods.

The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The index ranges in value from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

Figure 26: School Proficiency Index.



This dataset denotes values of the School Proficiency Index. The index illustrates school-level data to describe neighborhoods relative to nearby school performance. Specifically, the data is on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools.

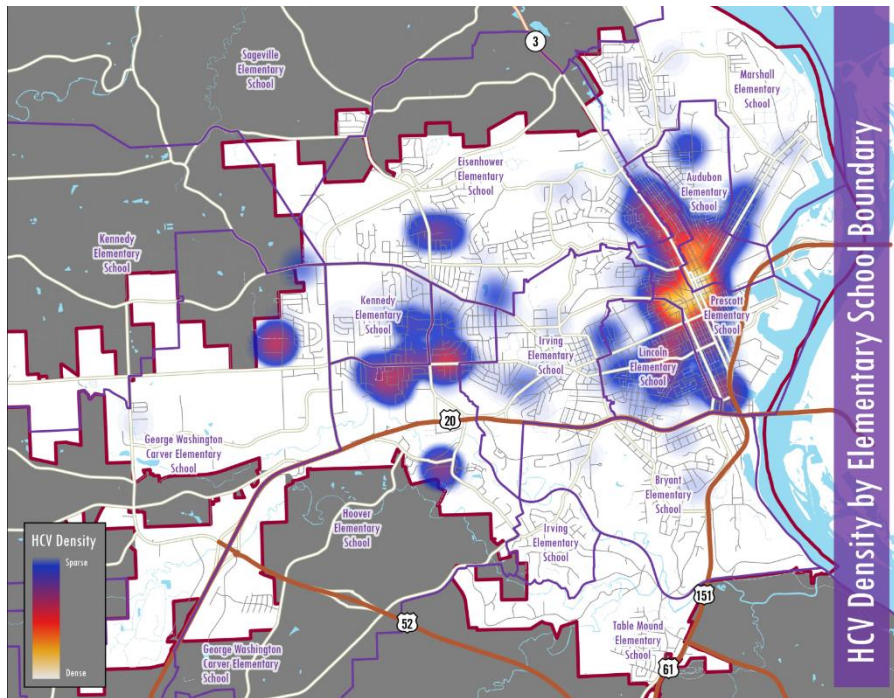
Esri, NASA, NGA, USGS | City of Dubuque, IA, Iowa DNR, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS | U.S. Department of Housing and Urban Development

Source: [School Proficiency Index | HUD Open Data Site \(arcgis.com\)](#)

The map above shows the proficiency of the schools located within the City of Dubuque. The darker the color, the better the performance. Based on the map, the schools located outside of the Downtown (Tracts 1, 4, 5,6) have a higher performance and quality than those located within Downtown Dubuque. This shows that while all schools across the community are providing the same level of education, the outcomes have been different in these locations.

HCV Density in Relation to Schools

Figure 27: HCV Density by Elementary School.



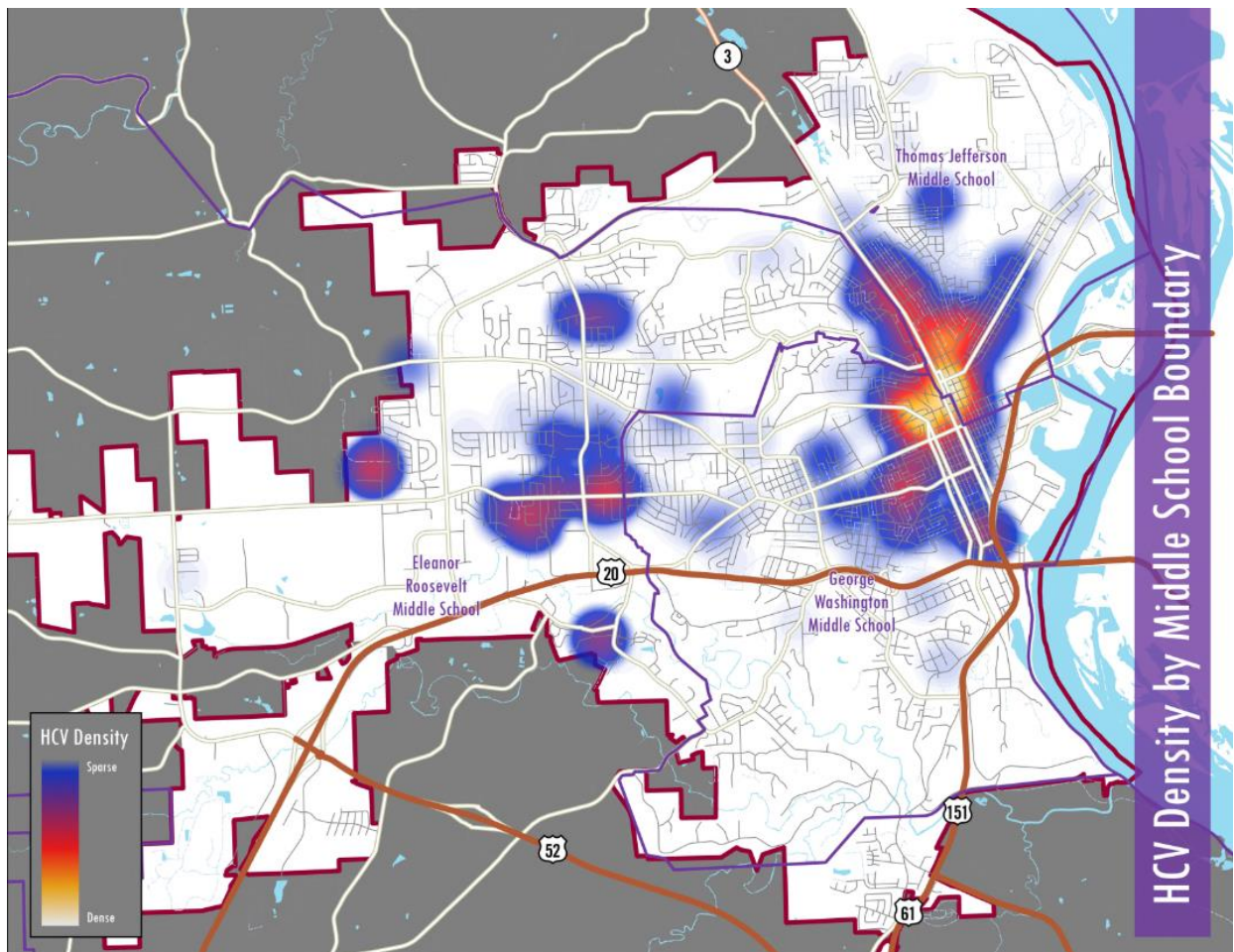
Source: City of Dubuque.

The following maps indicate the level of Housing Choice Voucher usage around the City in relation to the schools. The lighter the color, the denser the HCV usage and accessibility. Areas with more color are sparse or lacking in this program.

The City of Dubuque has 12 Elementary Schools scattered throughout the community. Of these, two of them are located within neighborhoods that have very dense Housing Choice Voucher density, meaning that the residents in these areas actively partake in the program to help provide for their housing. The schools located in these neighborhoods are in Downtown Dubuque (tracts 1 and 7.02). It should be noted that these areas are more commercial and retail based due to them being Downtown, but this map still highlights the lack of HCV in these areas.

It is interesting to note that these tracts are also areas with low income, old housing stock, and high poverty rates.

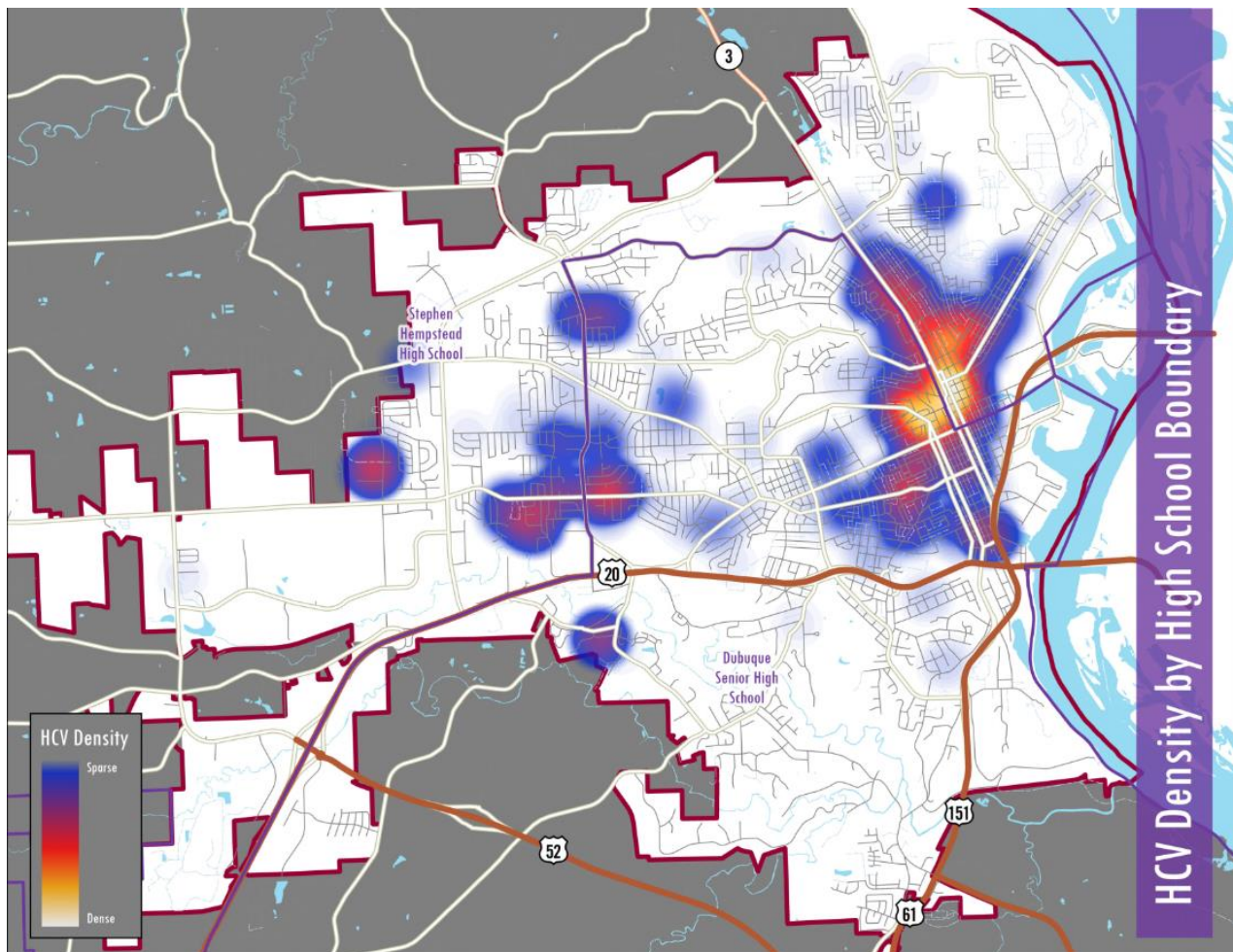
Figure 28: HCV Density by Middle School.



Source: City of Dubuque.

Three middle schools are located within the City of Dubuque. All of them are in neighborhoods with quite sparse Housing Choice Voucher usage and accessibility.

Figure 29: HCV Density by High School.

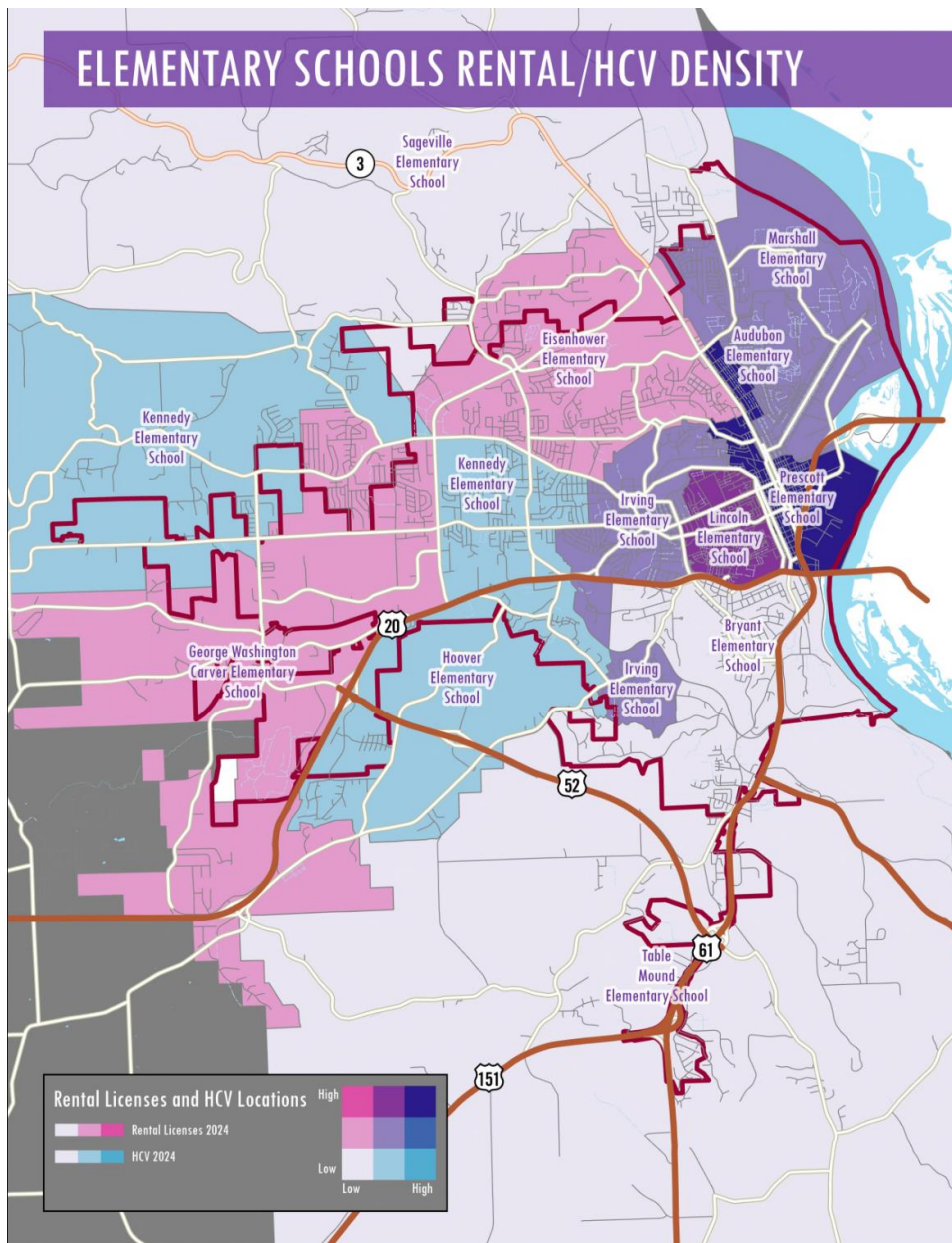


Source: City of Dubuque.

Dubuque has two High Schools and both of are located in Housing Choice Voucher sparse areas.

Schools in Relation to Rental Units

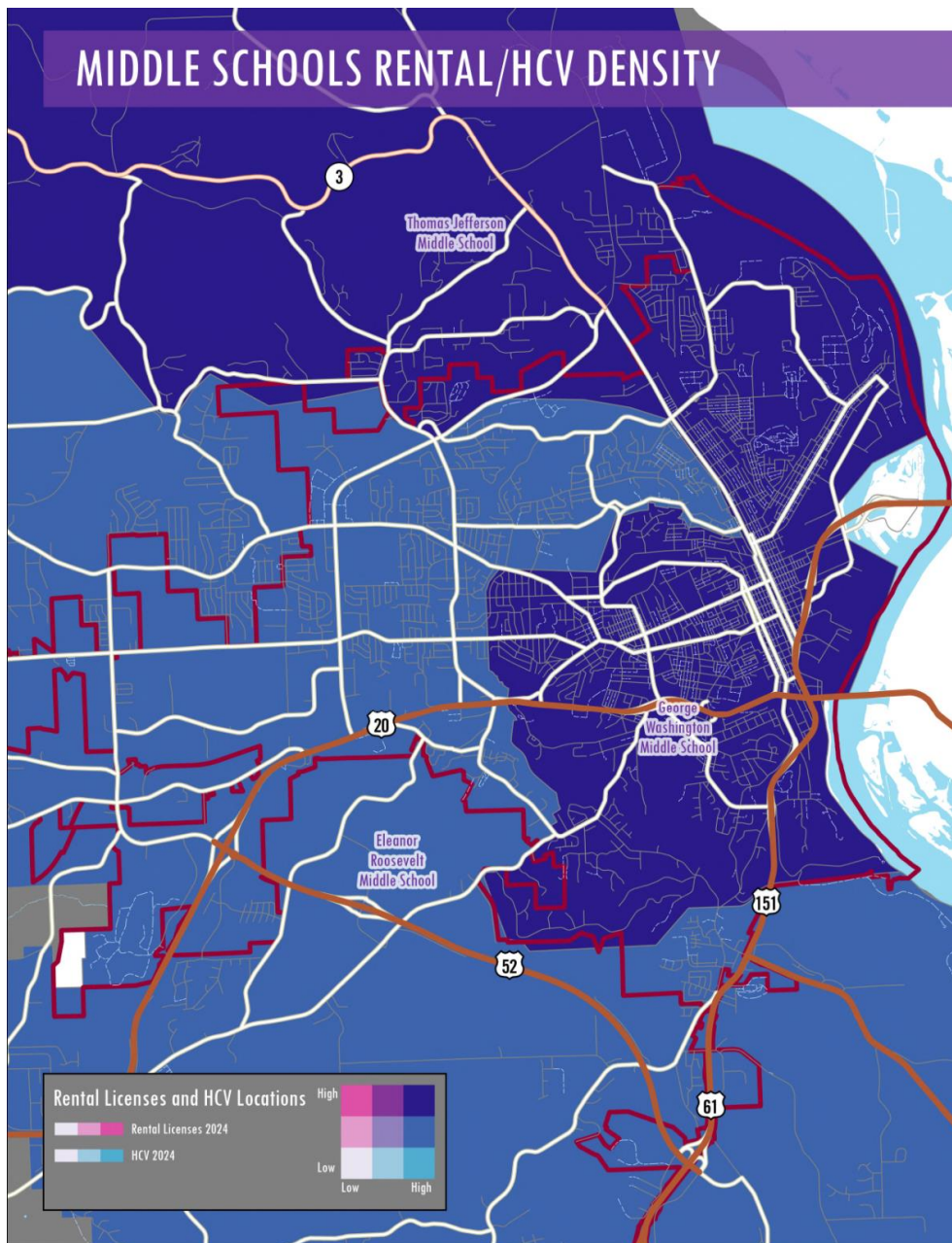
Figure 30: Elementary Schools vs. Rental/HCV Density.



Source: City of Dubuque.

The following maps show where rental licenses and Housing Choice Voucher density meet within the City of Dubuque. Prescott Elementary school sits in a neighborhood with high rental licenses and high Housing Choice Voucher presence. Figure 23 indicated the neighborhood was dense in Housing Voucher Usage compared to the rest of the City and appears to be high in renter-occupied housing.

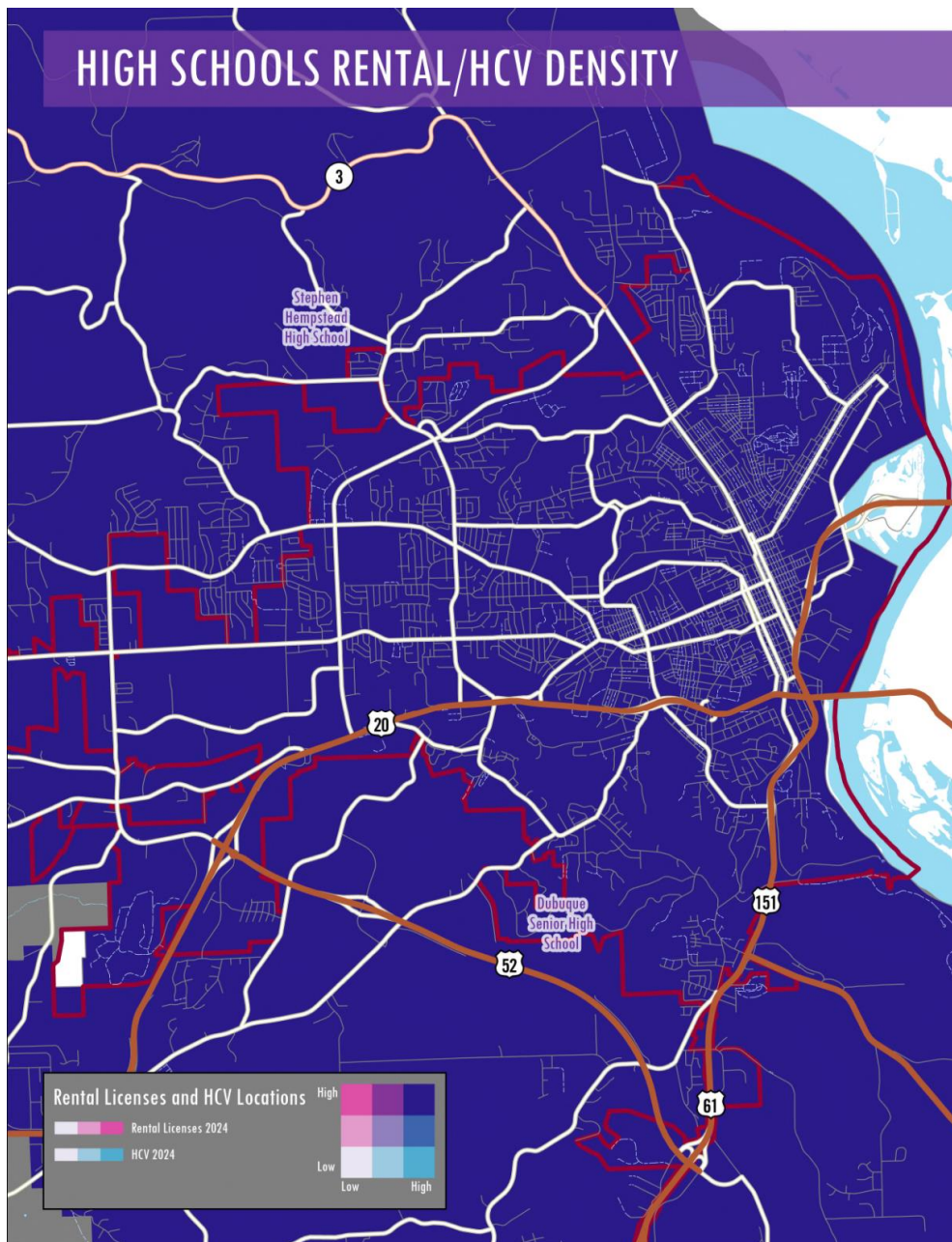
Figure 31: Middle Schools vs. Rental/HCV Density.



Source: City of Dubuque.

The Middle Schools in Dubuque are in areas that are both higher in rental licenses and dense in Housing Choice Voucher recipients.

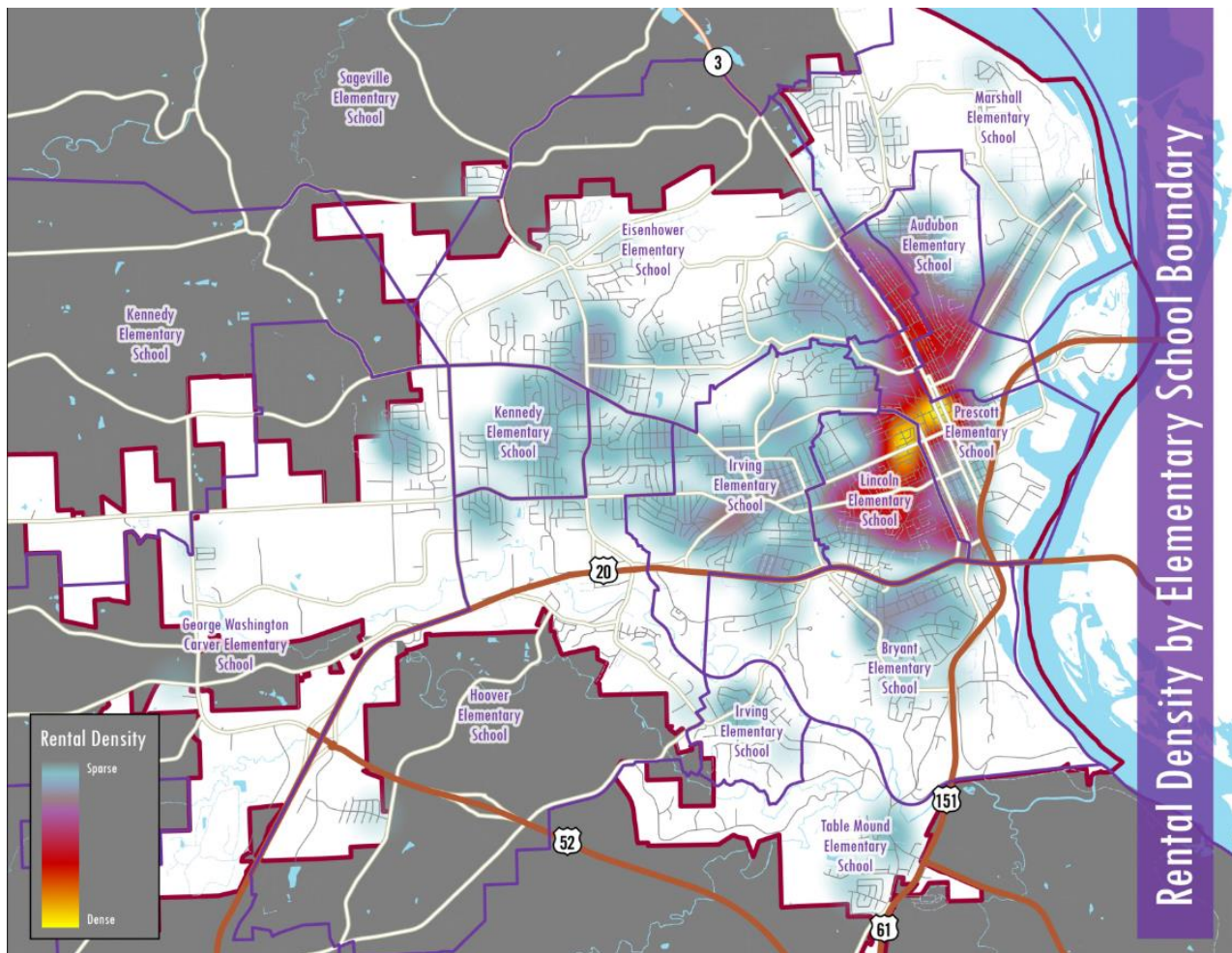
Figure 32: High Schools vs. Rental/HCV Density.



Source: City of Dubuque.

The High Schools in Dubuque are also located in areas that are high in rental licenses and Housing Choice Voucher recipients.

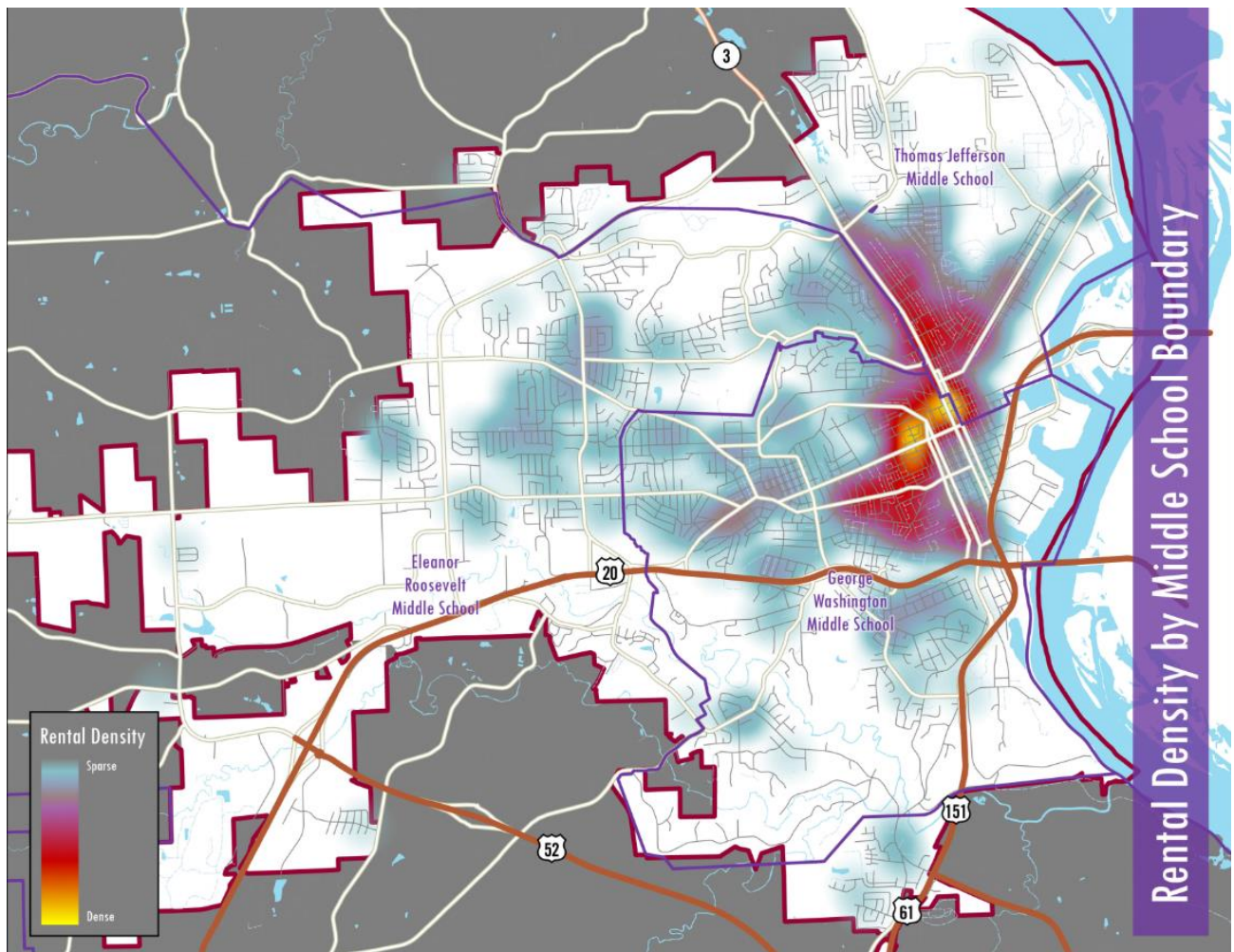
Figure 33: Rental Density by Elementary School Boundary.



Source: City of Dubuque.

As can be seen in Figure 29, rental density is highest in Downtown Dubuque (Tracts 3, 5, 7.01, 7.02) where Prescott and Lincoln Elementary Schools are located.

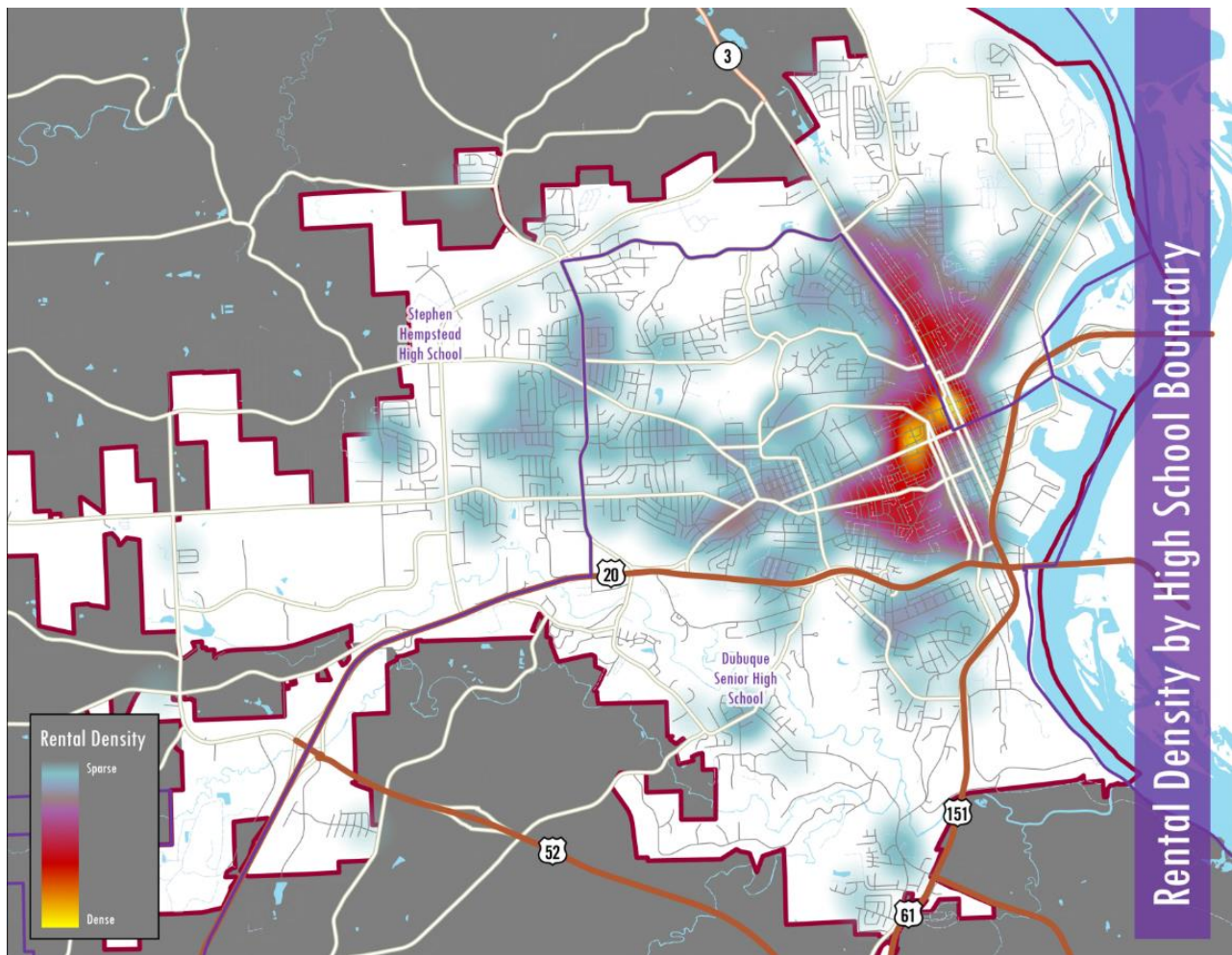
Figure 34: Rental Density by Middle School Boundary.



Source: City of Dubuque.

Both Middle Schools are located on the fringe of the dense rental neighborhoods.

Figure 35: Rental Density by High School Boundary.



Source: City of Dubuque

Dubuque's High Schools are also located in parts of the City heavy in owner-occupied housing and far from areas of rental density.

Transit Access

According to the Center for Neighborhood Technology's Housing + Transportation Affordability Index, Dubuque housing and transportation combined costs consume 44% of the families' total incomes. Single occupancy driving of car, truck or van is the most common form of commuting (80.3%) and the average work commute for City residents is 14.5 minutes. Compared to the rest of the country, Dubuquers spend much less time in their cars going to and from work.

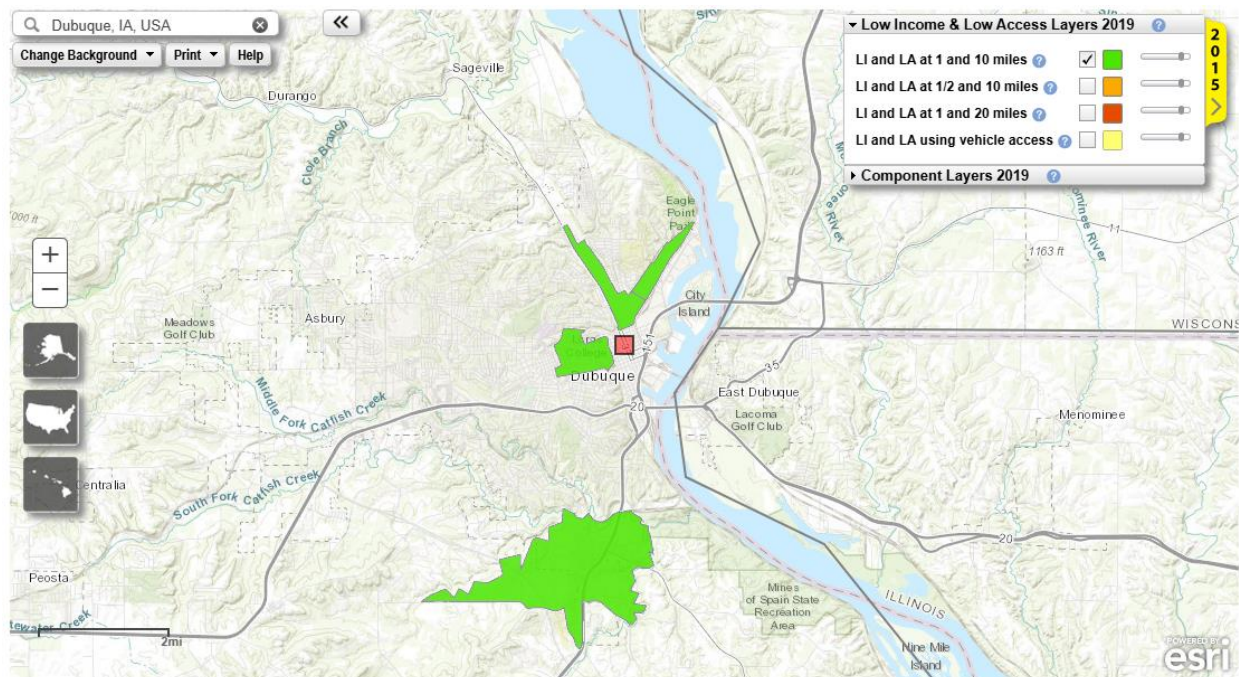
The city reports that over the past 5 years, the public transportation system has been expanded to increase accessibility for individuals with disabilities and low-income populations. Routes have also been changed. The Jule now offers two fixed-route busses and door-to-door paratransit mini-bus service throughout the city:

- Rack & Ride. All Jule buses are equipped with bike racks for passengers to use free of charge with the purchase of a regular bus fare ticket.
- Accessibility. All Jule buses are equipped with ramps and/or lifts to accommodate mobility devices. All Jule facilities and bus stops are accessible in compliance with the Americans with Disabilities Act (ADA).

Additionally, a door-to-door service for seniors is provided by a local nonprofit: DuRide. DuRide offers private car service 365 days a year and all DuRide volunteers complete a background check, hold a valid driver's license, and proof of insurance.

Food Access

Figure 36: Low Income and Low Access Map.



Last updated: Thursday, July 06, 2023

For more information, contact: [Alana Rhone](#)

Source: [USDA ERS - Food Access Research Atlas](#)

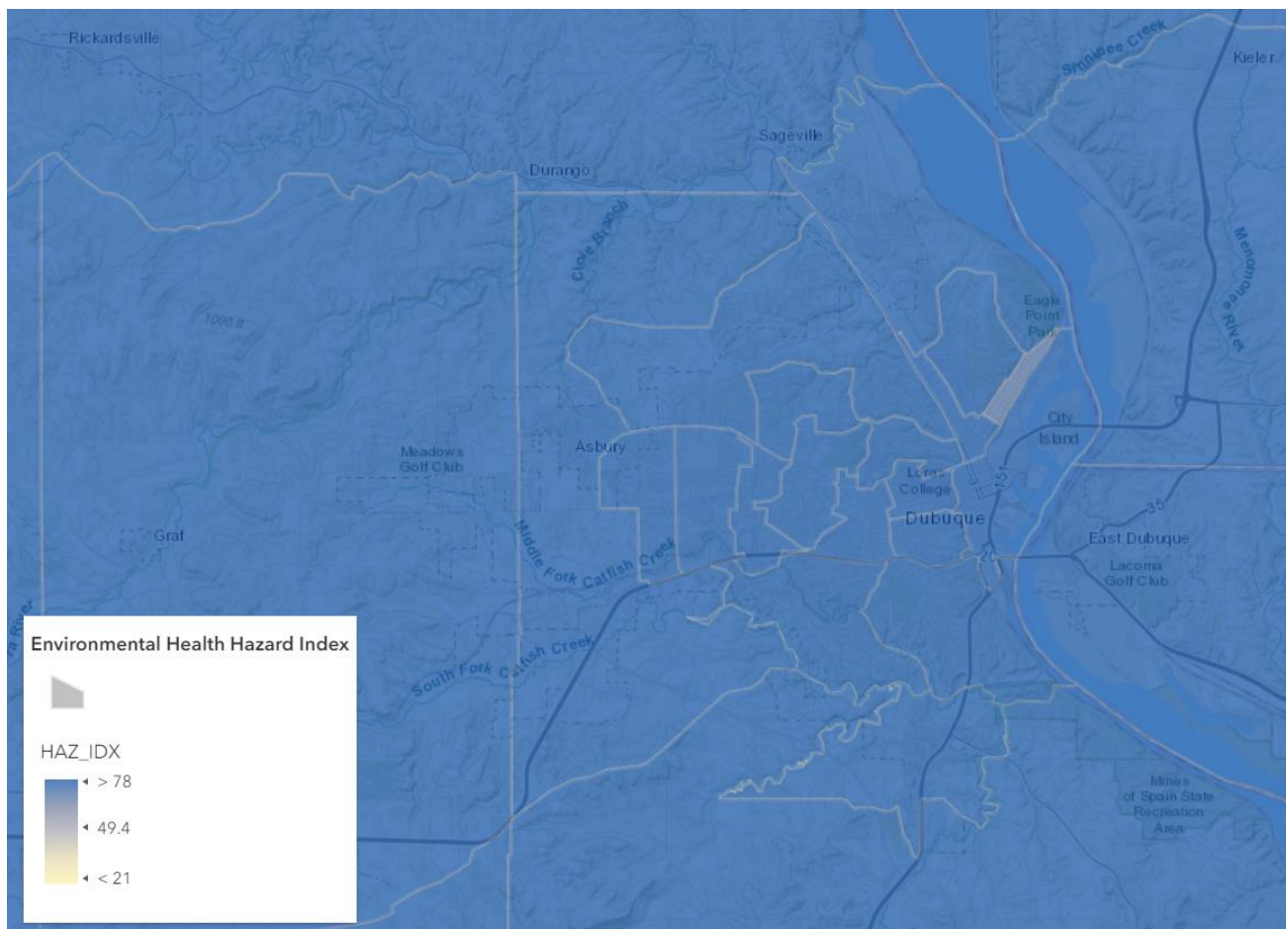
While slightly older data, the U.S. Department of Agriculture’s Food Access Research Atlas map above gives a spatial overview of food access indicators for low-income and other census tracts using different measures of supermarket accessibility. The map shows food access by census tract based on 2019 data (which was then updated July 6, 2023) and the distance one would need to travel to reach a full-service grocery store – the same areas within Dubuque where residents are more likely to live in poverty and rely upon public transit.

Figure 32 shows that Tracts 3, 5, and 7.01 within the City of Dubuque have lower levels of food access than other areas in the community. The average person would have to travel at least a mile in order to reach a full-service grocery store.

Environmental Health Index

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood. Values are inverted and then percentile ranked nationally. Values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group. Unfortunately, large parts of Iowa do not have any data, and there is little to no variance among the areas that do have data available. For Dubuque, there are variances again in the tracts where poverty is most concentrated.

Figure 37: Environmental Health Hazard Index.



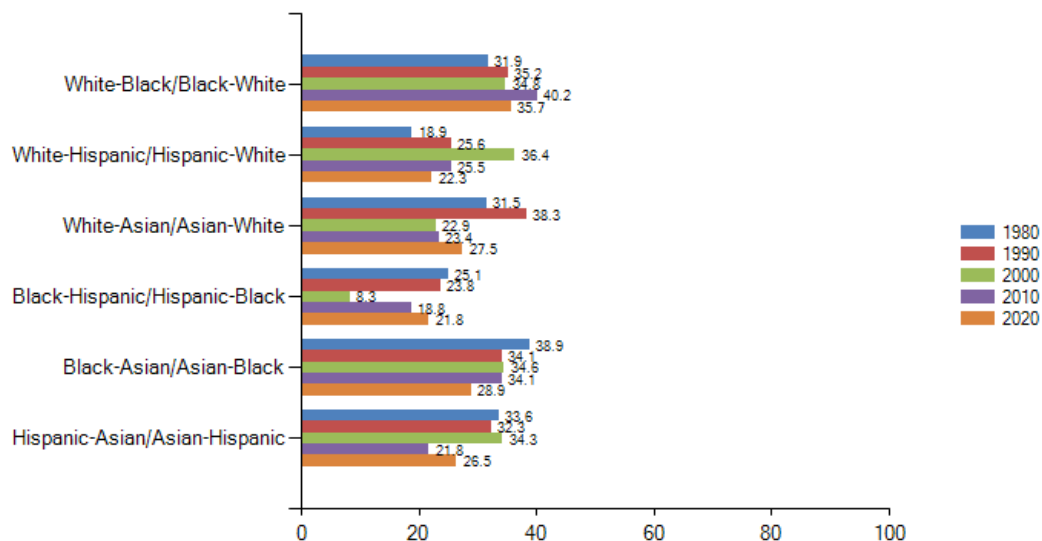
Source: [Environmental Health Hazard Index | HUD Open Data Site \(arcgis.com\)](https://arcgis.com)

The map above shows that the City of Dubuque does not have high levels of exposure to toxins. Tract 3 is the only census tract in the City to have a lower level of environmental quality. The tract itself is predominantly residential but is next to a heavy industrial neighborhood along the river.

Dissimilarity Index

The dissimilarity index is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block-groups. Index values range from 0 to 100. A high value indicates that the two groups tend to live in different tracts. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are fairly low. The chart below shows how the values have changed over time between 1980 and 2020.

Figure 38: Dissimilarity Index.



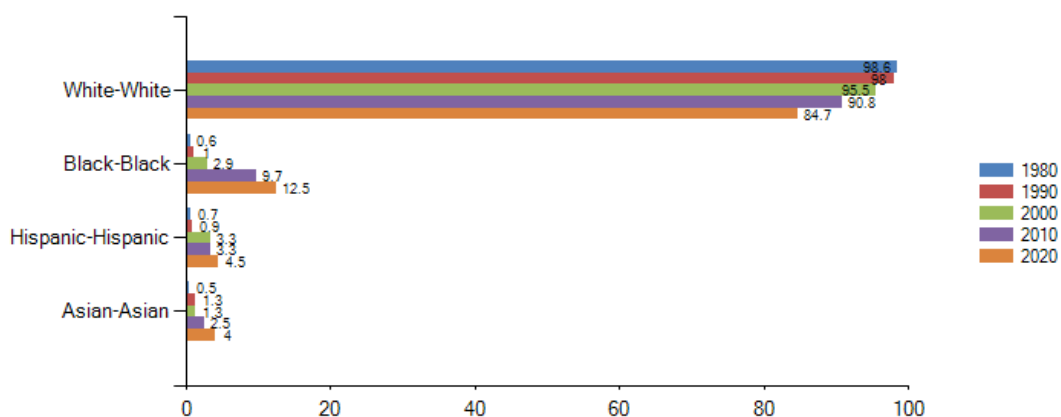
Source: <https://s4.ad.brown.edu/projects/diversity/index.htm>

The Dissimilarity Index for Dubuque shows that there is a moderate to low level of segregation. This means that in most tracts throughout the City are diverse and consist of at least two racial or ethnic groups.

Isolation Index

The isolation index is the percentage of the same-group population in the census tract where the average member of a racial/ethnic group lives. It has a lower bound of zero (for a very small group that is quite dispersed) to 100 (meaning that group members are entirely isolated from other groups). It should be kept in mind that this index is affected by the size of the group - it is almost inevitably smaller for smaller groups, and it is likely to rise over time if the group becomes larger. This chart illustrates that the isolation index of white individuals is consistently higher than that of its black, Hispanic, and Asian counterparts.

Figure 39: Isolation Index.



Source: [Diversity and Disparities \(brown.edu\)](https://brown.edu/diversity-and-disparities)

The Isolation Index for Dubuque shows that White individuals are widely dispersed throughout the City, while Black, Hispanic, and Asian groups are significantly more limited in what tracts they live in. The data shows that there has been growth and expansion each decade in where minority groups in Dubuque are living, but due to the size of these groups in comparison to White residents these numbers may seem more extreme than they are.

2025 And Forward

The fair housing barriers identified through AI research are provided in the table below. A priority ranking of actions, per HUD's AFH tool, are assigned based on:

- The significance of the barrier in limiting housing choice,
- The significance of the barrier in contributing to segregation, and
- Ease of implementation (12-24 months).

This plan and its activities span a five-year period.

Key themes that serve as the foundation for 2025 plan include:

- Lack of available, affordable, quality housing.
- The Housing Choice Voucher Program is still not accepted city-wide; current locations of HCVs show higher usage in concentrated areas of poverty and older housing stock.
- Unequal access to opportunities and resources within Dubuque such as school quality, food, and transportation.
- More affordable childcare, activities, and programming.

The following goals and action items were derived from both the data collected and analyzed within this document as well as the feedback received from the Focus Groups and Survey.

2025 Fair Housing Plan

Goal #1: Advance equity with fair housing advocacy, education, and enforcement.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
Housing Choice Vouchers are not being protected as a source of income for many rental units and many landlords do not accept them. This limits where individuals and families are able to live and the type of housing available to them.	Continue working with landlords in Dubuque to educate them on the benefits and importance of Housing Choice Vouchers in order to expand the program throughout Dubuque.	
	Create more educational opportunities for first time homebuyers and renters on topics like financial literacy and home maintenance.	

	Enhance education and training for landlords through the Successful Property Maintenance course that the PHA presents regarding the Housing Choice Voucher Program.	
	Provide educational resources about pets in Housing Choice Voucher units.	

Goal #2: Implement local government policies that encourage equity and decrease disparate impacts.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
While childcare has grown over the past few years, there is still a need for more, affordable childcare and activities for children in Dubuque. (Noted in Focus Groups).	Look into partnering with schools or other organizations to provide more public activities, amenities, and programs to children in underserved parts of Dubuque.	
	Continue to grow affordable childcare and consider care for special needs children and children whose parents work the 2nd or 3rd shift.	

Goal #3: Increase and promote safe, affordable housing.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
Lack of quality, affordable housing stock.	Allocate more resources and work with Iowa Finance Authority (IFA) and other agencies to grow affordable housing development and provide incentives for developers to include affordable units in their projects.	
	Implement policies to protect, maintain, and grow current affordable housing stock, including working with homeowners, landlords, and tenants.	
	Investigate to ensure that current affordable housing is not at risk of being converted to higher-end units.	

Home ownership in Dubuque for non-white residents can be challenging as they tend to face more barriers such as denied loans, language barriers, and general lack of awareness of the materials and resources available to them.	Develop a policy for regular review of City administered lending practices for fair housing issues. Include, at a minimum, loans for home purchase, home improvement, and refinancing.	
	Consider creating an independent fair housing testing program to ascertain if prohibited discriminatory practices are occurring.	
	Ensure translations are available for all important documents and applications and easily accessible both online and in physical form.	

Goal #4: Increase access to opportunity and the building of social capital.		
Barrier	Action	Status (Upcoming, In Progress, On Hold, Complete)
The nonprofit service array is confusing to consumers.	Use assessments from the Equitable Poverty Prevention Plan and any other relevant plans regarding the nonprofit services array and gaps to make necessary improvements that increase access to opportunity and coordinated entry.	
Unequal access to opportunities and resources such as food, quality education, and transportation.	Increase regional cooperation among service providers.	
	Consider community gardens or incentivize grocery store development within food-insecure neighborhoods of Dubuque.	
	Identify transportation gaps throughout Dubuque for those that may not have their own vehicles and rely on walking, biking, or public transportation.	

Conclusion

Housing is an essential asset to the community and a key indicator of the health and quality of life of Dubuque. The City of Dubuque is an award-winning community that has earned positive recognition to be proud of over the past few years:

- Score of 100 on 2023 Municipal Equality Index
- America in Bloom – Growing Vibrant Communities 2022
 - Over 35,000 Population Category Award
- Named an Iowa Thriving Community 2023
- Named one of 24 selected cities to participate in Cities Forward Program 2023
- Iowa Community of Character 2024

Despite these accolades, 13% of Dubuque’s population still lives in poverty. Although this figure has improved since 2018, it remains a significant issue. The close connection between poverty and housing reveals several barriers to fair housing, including a shortage of affordable housing, substandard living conditions, and high housing costs. A major concern is the reluctance of landlords to accept housing vouchers as a source of income for renters. Additionally, residents’ housing options are limited by poverty and a state minimum wage that has not kept pace with the rising costs of housing and living expenses.

The City aims to attract new businesses while ensuring that current residents can thrive. Its comprehensive plan, Imagine Dubuque, outlines strategies to enhance housing options and neighborhood livability. Additionally, the Equitable Poverty Prevention Plan offers further strategies to increase equity within the jurisdiction.

This analysis highlights that some previous fair housing actions have not seen as much progress. Specifically, the action to streamline the nonprofit services array and to make necessary improvements to increase access to opportunity and coordinated entry. This action carries over from the 2019 Impediments to Fair Housing Plan.

These actions remain relevant and are included in the proposed five-year fair housing plan. Specifically, fair housing enforcement and expanding safe and affordable housing units is essential for Dubuque’s future. By addressing fair housing impediments and related contributing factors, in conjunction with Imagine Dubuque and the Equitable Poverty Prevention Plan, the community can be transformed, ultimately achieving Dubuque’s vision of a viable, livable, and equitable community.

Appendix

Definitions

Affirmatively Furthering Fair Housing

Taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all program participant's activities and programs relating to housing and urban development.

Affordable Housing

Affordability of housing is relative to income generated per household. The most used statistic for gauging affordability is 30% of a household's income, meaning that a household spending up to 30% of their income towards housing related expenses equates to affordability. Renter's housing costs, for example, may include utilities. Homeowner costs may include things like insurance, mortgage payment and anticipated costs of repair, taxes, and utilities.

American Community Survey (ACS)

ACS is an ongoing survey conducted by the US Census Bureau that provides data estimates every year. ACS data is used to show characteristics and trends in populations, not hard counts. In this AI, five-year data is used when available to increase the accuracy and readers' understanding of trends; ACS five-year estimates 2019-2014 are the primary data source in the City's 2025 Analysis of Impediments.

Community Development Block Grant (CDBG)

CDBG is a federal grant program administered by the US Department of Housing and Urban Development (HUD) that provides funding for community development opportunities. For municipalities with populations over 50,000 are called entitlement communities. The goal of the CDBG program is to provide benefit to low- and medium income households to ensure affordable housing opportunities, provide services to vulnerable populations, and support economic development opportunities.

Comprehensive Housing Affordability Strategy (CHAS)

CHAS data is a US Department of Housing and Urban Development (HUD) custom tabulation of ACS data from the US Census Bureau that are not available through standard Census products. Datasets are typically released a year behind ACS tabulations, but have increased precision of

tabulations, especially among housing-related data. This data is meant to demonstrate the extent of housing problems and housing needs, particularly for low-income renter households.

Disability

(1) The term "disability" means, with respect to an individual:

- (i) A physical or mental impairment that limits one or more major life activities of such individual;
- (ii) A record of such an impairment; or
- (iii) Being regarded as having such an impairment.

(2) The term "disability" as used herein shall be interpreted consistent with the definition of such term under section 504 of the Rehabilitation Act of 1973, as amended by the Americans with Disabilities Act Amendments Act of 2008. This definition does not change the definition of "disability", or "disabled person" adopted pursuant to a HUD program statute for purposes of determining an individual's eligibility to participate in a housing program that serves a specified population.

Home Mortgage Disclosure Act (HMDA)

The HMDA is a data source supplied in part by mandatory reporting of loan applications within metropolitan statistical areas. HMDA data is used in this report to show loan originations and denials only, by race, for first liens on owner-occupied housing.

Housing Choice Voucher (HCV)

HCV is a major program by the federal government to assist the very low-income families, the disabled and the elderly to access safe, sanitary, and decent housing available in the private market. Often referred to as "Section 8."

Housing Cost Burden

When a household spends more than 30% of adjusted gross household income on housing, they are considered cost burdened. Households that spend more than 50% of their household income on housing are considered severely cost burdened.

HUD Area Median Family Income (HAMFI)

HAMFI is a measure of median income by household calculated by HUD determined housing markets, based on metropolitan statistical areas. While HAMFI does not provide the precision of a County Median Income or City Median Income, HAMFI offers HUD the ability to adjust median income by known household size in CHAS tabulations, providing more consistent data metrics across demographics.

CDBG programs define "low-income" households as earning below 50% of the Area Median Income, while under Section 8 Housing Assistance Payments a household earning 50% of the Area

Median Income or under would be considered “very low-income”. These income definitions vary by program across all income levels. For this report's purposes, a variation of the most common definitions is used to describe the income levels of households of various sizes.

Iowa Finance Authority (IFA)

IFA administers statewide affordable housing programs including mortgage and down payment assistance, as well as programs that assist in the development and preservation of affordable rental properties. IFA also offers programs to assist in community development and maintains a searchable database—Iowa Interactive Dashboard—a key data source for this AI.

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

The federal government agency that implements law, policies and programs related to housing and community development. HUD was created to strengthen the housing market and fair access to it.

Table of Figures

Figure 1: Fair Housing Complaints Since 2019.....	Pg. 18
Figure 2: City of Dubuque Population.....	Pg. 21
Figure 3: Age & Sex.....	Pg. 22
Figure 4: Foreign Born Population & Non-Citizens.....	Pg. 24
Figure 5: Map of Black or African American Alone.....	Pg. 27
Figure 6: Map of Poverty Rate.....	Pg. 28
Figure 7: Map of Low-Income Households.....	Pg. 29
Figure 8: Map of White Population Alone.....	Pg. 30
Figure 9: Employment by Occupation.....	Pg. 32
Figure 10: Employment by Industry.....	Pg. 33
Figure 11: Median Earnings by Industry.....	Pg. 34
Figure 12: Year Structure Built.....	Pg. 37
Figure 13: Rental Housing Built Before 1949.....	Pg. 38
Figure 14: Renter Occupied Housing.....	Pg. 39
Figure 15: Map of Project-based and LIHTC Properties.....	Pg. 43
Figure 16: Dubuque Zoning Map.....	Pg. 44
Figure 17: Imagine Dubuque Housing Recommendations.....	Pg. 45
Figure 18: Dubuque Housing TIF Districts.....	Pg. 46
Figure 19. Loan Application Denial by Race	Pg. 47
Figure 20. 2030 Dubuque County Housing Forecast	Pg. 48
Figure 21. 2030 Project Home Demand by Category	Pg. 48
Figure 22. 2030 Projected Owner-Occupied Home Supply by AMI	Pg. 49
Figure 23: Dubuque County Opportunity Index.....	Pg. 50
Figure 24: Low Poverty Index Map.....	Pg. 51
Figure 25: Low to Moderate Income Population by Tract.....	Pg. 52
Figure 26: School Proficiency Index.....	Pg. 53

Figure 27: HCV Density by Elementary School	Pg. 54
Figure 28: HCV Density by Middle School	Pg. 55
Figure 29: HCV Density by High School	Pg. 56
Figure 30:: Elementary Schools vs. Rental/HCV Density	Pg. 57
Figure 31: Middle Schools vs. Rental/HCV Density	Pg. 58
Figure 32: High Schools vs. Rental/HCV Density	Pg. 59
Figure 33: Rental Density by Elementary School Boundary	Pg. 60
Figure 34: Rental Density by Middle School Boundary	Pg. 61
Figure 35: Rental Density by High School Boundary	Pg. 63
Figure 36: Low Income and Low Access Map.....	Pg. 64
Figure 37: Environmental Health Hazard Index.....	Pg. 65
Figure 38: Dissimilarity Index.....	Pg. 66
Figure 39: Isolation Index.....	Pg. 67
CDBG Survey Questions.....	Pg. 77

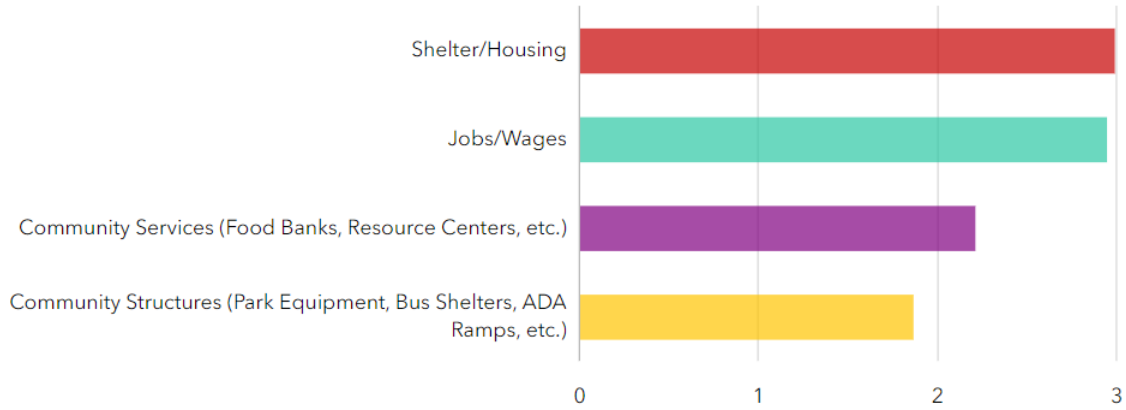
CDBG Survey Questions and Results

● What are the highest needs in our community? *



Column

Bar



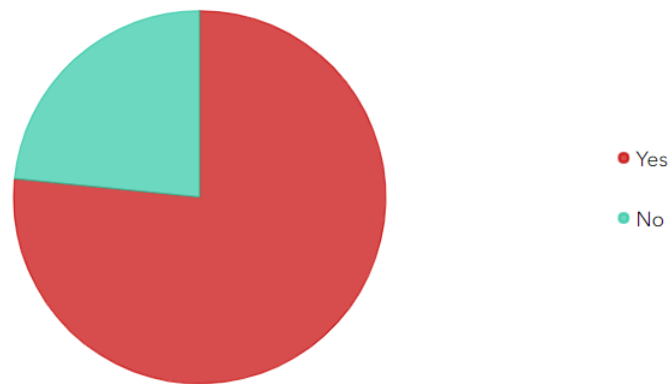
● Do you feel some services are less available or accessible to some people? *

Column

Bar

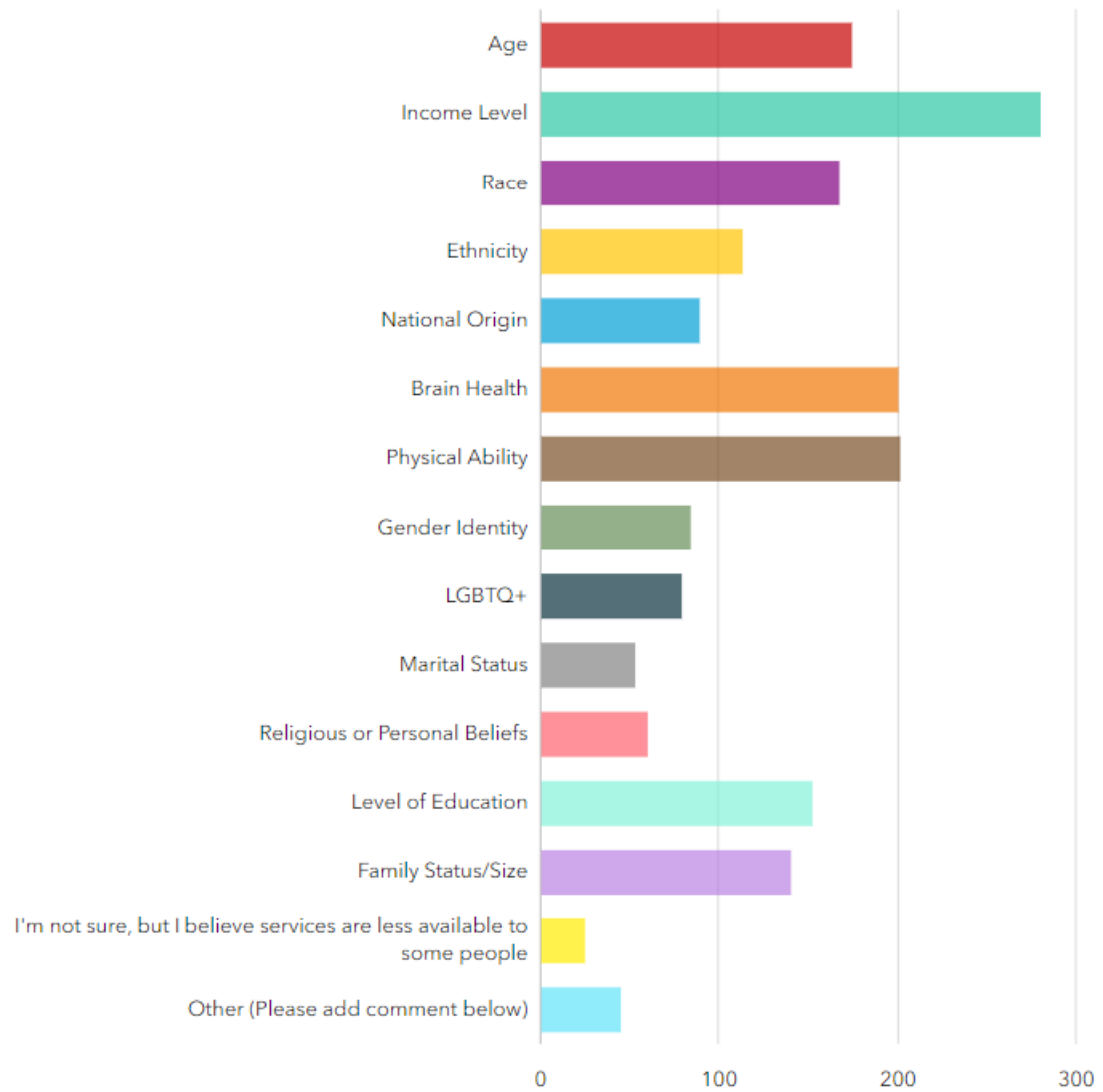
Pie

Map



● Select which characteristics may create barriers to access

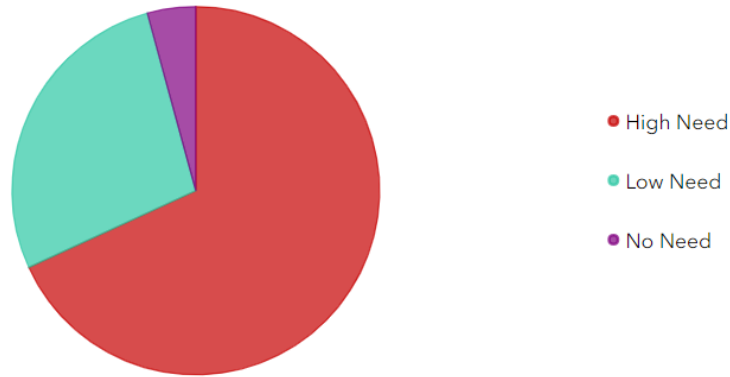
Column Bar



Access to Services > Please rate the level of need for each activity or group in the Dubuque Community

● ● Abused and/or Neglected Children

Column Bar Pie Map



● ● Buildings for Persons with Disabilities

Column Bar Pie Map

