NORTH TEXAS REGIONAL HOUSING ASSESSMENT

City of Dallas

November 2018

UNIVERSITY OF TEXAS ARLINGTON

Pursuant to the U.S. Department of Housing and Urban Development's (HUD's) new rule issued in 2015 to affirmatively further fair housing, the Dallas City Council authorized an interlocal agreement in December of 2016 with The University of Texas at Arlington to conduct the North Texas Regional Assessment of Fair Housing. This was a collaborative effort and included a total of 21 jurisdictions in the North Texas Region. In May of 2018, HUD suspended the requirement to conduct the Assessment of Fair Housing. Based on the fact that the City of Dallas was already under contract and that the study would assist the City of Dallas and other jurisdictions in the duty to affirmatively further fair housing, staff recommended and the Dallas City Council approved the completion of the study.

The information from the AFH study will be utilized to develop the Analysis of Impediments, 5 Year Consolidated Plan, Equity Plan and make refinements to the City of Dallas Housing Policy. A draft of the report is now available for public review and comment. You can access the report at **www.dallasfairhousing.com** or northtexasrha.com.

Hard copies of the report are also available at the J. Erik Jonsson Central Library, 1515 Young Street, Dallas, Texas 75201 and at the Office of Equity and Human Rights at Dallas City Hall, 1500 Marilla Street, Room 1BN, Dallas, Texas 75201. Comments on the draft report will be received over the next 45 days from November 19- through January 2, 2019. Comments should be emailed to **AFH@dallascityhall.com** or can be submitted in writing to Hiwote Tadesse, Fair Housing Coordinator, Office of Equity and Human Rights, 1500 Marilla Street, Room 1BN, Dallas, Texas 75201.

Table of Contents

List of Tables

List of Figures

COVERSHEET

This page left blank intentionally

I. Coversheet

1. Submission date:
2. Submitter name:
3. Type of submission (*e.g.*, single program participant, joint submission):
4. Type of program participant(s) (*e.g.*, consolidated plan participant, PHA):
5. For PHAs, Jurisdiction in which the program participant is located:
6. Submitter members (if applicable):
7. Sole or lead submitter contact information:
   a. Name:
   b. Title:
   c. Department:
   d. Street address:
   e. City:
   f. State:
   g. ZIP code:
8. Period covered by this assessment:
9. Initial, amended, or renewal AFH:
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;

11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o) and 903.15(d), as applicable.

***(Print Name)   (Program Participant/Title)   (Signature) (date)

***(Print Name)   (Program Participant/Title)   (Signature) (date)

***(Print Name)   (Program Participant/Title) (Signature) (date)

This page left blank intentionally

EXECUTIVE SUMMARY

This page left blank intentionally

II. Executive Summary

In 2016, a consortium of more than 20 Dallas-Fort Worth (DFW) cities and housing authorities ("regional working group") formed to respond to the U.S. Department of Housing and Urban Development's (HUD) requirement to complete an Assessment of Fair Housing (AFH) pursuant to the new rule on "Affirmatively Furthering Fair Housing (the "AFFH Rule").

Under the lead of the City of Dallas, the regional working group retained the University of Texas at Arlington[1] (UTA) as a consultant to conduct the assessment. The North Texas Regional Housing Assessment (NTRHA) launched in January 2017 and entailed three integrated phases: community outreach, data analysis and the formulation of fair housing goals to address the issues identified.

For the purpose of the assessment, HUD provided data and analytical tools, which the UTA researchers supplemented with local knowledge and local data obtained through outreach activities and additional data collection and analysis.

This report documents the AFH process and findings for the City of Dallas and the North Texas region; it intends to provide meaningful, data-driven insight for the City to develop strategies that affirmatively further fair housing. The following sections discuss the results:

- **Community participation** – Throughout the assessment, the City of Dallas devoted considerable effort and resources to continuously engage the community through a variety of strategies. The UTA researchers collected information from the public, stakeholders and subject matter experts through public meetings, focus groups, consultations and surveys.
- **Assessment of past goals and strategies** – The City of Dallas has made progress toward affirmatively furthering fair housing by promoting decent, safe and affordable housing through rehabilitation, homeownership and housing development programs, rental assistance, and housing for homeless persons and families and other special needs populations.
- **Fair housing analysis** – The UTA researchers conducted a variety of quantitative analyses examining the intersection of poverty, transportation, segregation and housing to create an informed and balanced picture of the fair housing landscape in Dallas and North Texas. Stakeholder and expert knowledge informed the development of analytical procedures. The study focuses on racial and ethnic segregation, the concentration of poverty, and housing problems for families with children, seniors and persons with disabilities and limited English proficiency as well as other protected classes to identify fair housing issues and barriers to access opportunity.
- **Fair housing goals and priorities** – In collaboration with City staff, the UTA researchers identified priorities for action among the fair housing issues that the research process recognizes and consequently developed fair housing goals to address these issues.

Seven preeminent **fair housing issues** transpire from this assessment:

- **Imbalances region/jurisdiction:** The nonwhite population and the population in poverty disproportionally reside in Dallas than in the region. Similarly, the rate of housing problems remains greater in Dallas than in the region.
- **Racial/ethnic inequities**: Black and Hispanic households face housing problems and cost-burden challenges at a higher rate and with greater geographic dispersion than do

---

[1] Researchers from the Department of Civil Engineering and the College of Architecture, Planning and Public Affairs at the University of Texas at Arlington

white households. The data suggests that nonwhite households have a lower access to opportunity than white households.

- **Persistence and proliferation of racially/ethnically concentrated areas of poverty**: While some R/ECAPs dissipated over time, the number of R/ECAPs in Dallas doubled over the last 26 years, with persistent patterns in south and west Dallas. Two-thirds of the 1990 R/ECAPs retain their designation.
- **Growing segregation:** The data shows an increasing level of nonwhite/white segregation characterized by clear spatial patterns.
- **Source of income discrimination:** The data suggests that the prerogative of landlords to refuse voucher holders affects the residential pattern of housing choice voucher families and the concentration of poverty.
- **Growing affordability pressure**: Home prices, apartment rents and property taxes continue to rise rapidly and exceed the capacity of many residents to afford housing, especially households with income at or below 30% of the area median income, persons with disabilities, persons living on fixed incomes, and single-parent families with small children.
- **Transportation/employment:** Lower income residents have limited access to affordable housing in proximity to good jobs with better wages. The lack of affordable, reliable transit options worsens this problem.

Though public engagement activities, participants identified six additional issues and/or contributing factors to fair housing issues:

- **The location of proficient schools and school assignment policies** contribute to residential sorting across racial and economic lines.
- **The loss of and location of affordable housing** exacerbate neighborhood inequities and tend to contribute to poverty concentration.
- **The lack of integrated, supported, affordable housing for persons with disabilities**: Most persons with disabilities find housing completely unaffordable, especially when they have a limited or fixed income.
- **Discrimination and community opposition**: Discrimination manifests in many compounding ways – through community opposition, source of income discrimination, lending discrimination and private discrimination, which tend to exacerbate housing challenges.
- **Resources for fair housing enforcement**: Residents need more support to know and exercise their rights in relation to problems with landlords and tenancy. Fair housing agencies are being asked to do more with no increase in resources.
- **Investment in and revitalization of neighborhoods**: Older, lower income neighborhoods need more holistic investment to improve and increase public infrastructure, retail services and recreational opportunities.

This report sets forth six **fair housing goals** to affirmatively further fair housing:

- Increase access to affordable housing in high opportunity areas
- Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas
- Increase supply of accessible, affordable housing for persons with disabilities
- Make investments in targeted and segregated neighborhoods to increase opportunity while protecting residents from displacement
- Increase services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing
- Increase access to information and resources on fair and affordable housing

COMMUNITY PARTICIPATION

Photo Credit: City of Dallas, 2018

This page left blank intentionally

III. Community Participation Process

| 1 | *Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP) and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.* |

i. Overall Strategies

The public participation strategies developed and pursued for the purpose of the assessment included various methods and platforms to ensure continuous and meaningful community engagement. In order to remain responsive to the needs of the community, many outreach tools were updated and created at different stages in an effort to further broaden and facilitate participation. Table 1 shows the key tools utilized throughout the process, as well as their intended goals and target groups.

Table 1: Public participation tools, goals and target groups

Tool/Strategy	Goals	Target Groups
Public Meetings	• Fulfill governmental requirements for transparency • Convey HUD data in understandable ways to the public • Provide opportunity for attendees to comment on information provided • Gather community reaction to HUD data and local information about fair housing opportunities	• All citizens interested in the subject • Low-income community members • Residents of publicly supported housing
Focus Groups – Demand Side	Gather local, group-specific and site-specific information about housing experiences and needs, including: • Disparate treatment in housing access • Impediments to accessing affordable, quality housing • Barriers to housing in high-opportunity areas • Experiences with gaining access to high-quality education, affordable transportation, environmentally healthy communities • Satisfaction with ability to access fair housing information • Priorities for housing improvement • Experiences with publicly supported housing programs, including positive	• Consumers of publicly supported housing programs • Residents of low-income communities • Persons with disabilities • Renters and owners • Seniors • Limited English proficiency groups

Tool/Strategy	Goals	Targets
Focus Groups – Supply Side	Gather local and jurisdiction-specific information about challenges of producing and supporting affordable housing, including: • Housing market conditions such as cost, availability, development, etc. • Programs available to assist homeowners and renters • Programs available to support developers (tax credits, etc.) • Public housing authority operations, management, conditions, challenges • Supportive services available for low-income housing residents to increase opportunity and access to affordable housing • Strategies for increasing accessibility to affordable housing in high-opportunity areas and improving conditions in low-opportunity areas	• Housing authority and city staff and leadership • Real estate professionals and associations • Developers and owners/managers of rental housing properties • Affordable housing providers • Providers of housing services and supports for low-income residents
Consultations	Gather local information on: • School systems and the impact of housing instability on education outcomes • Environmental hazards affecting residents • Transportation system capacity and gaps • Other systemic barriers to affordable housing, including criminal background, bad credit, family size, disability • Health outcomes and disparities based on location of residence	• School district staff, leadership, homelessness coordinators • Planning managers of transit programs • City and county staff and leaders • Low-income housing advocates • Advocates for special populations, including persons with disabilities, low-income community residents, minorities, women • Low-income housing academic experts
Survey	Gather information on housing and neighborhood priorities from community members	• Public at large • Consumers of publicly supported housing • Special housing needs groups

Independent facilitators, i.e. UTA researchers, rather than individuals associated with the City of Dallas, conducted all public participation efforts throughout this project, including public meetings and focus groups. This ensured that all community members would feel comfortable sharing firsthand experiences and knowledge and could criticize agencies openly, if desired. The UTA research team is confident that this report captures community voices and their account of housing realities.

ii. Overview of Public Participation Structure and Timeline

The North Texas Regional Housing Assessment started in January 2017. The following section offers a brief overview of the key public participation/consultation phases that took place throughout the life of the project.

Two rounds of **public meetings** were conducted. The first round sought to present to the community the HUD-provided data on fair housing-related challenges and collect local knowledge and insight on the contributing factors to those issues. The second round consisted of briefly presenting the key findings from the assessment (derived from both data and public input analysis) and gather feedback from the community on the proposed goals and tools to affirmatively further fair housing in Dallas and North Texas.

In parallel, a **surveys** were developed to further gain insight on fair housing challenges and broaden public participation. These surveys were made available on the NTRHA website, relayed on participating cities' and housing authorities' websites as well as other agencies/organizations providing supportive services, and disseminated at public meetings, public libraries, housing-related events occurring in the region and participating housing authorities' and cities' headquarters.

In addition, UTA lead researchers conducted targeted **focus groups** and **consultation** meetings to further gain insight on fair housing barriers existing in the City and the North Texas region. The UTA research team assembled a technical advisory board of experts to critically review data findings and the proposed fair housing goals.

Finally, the UTA research team participated in several **events** and **panel discussions** to raise awareness about the fair housing assessment, gather insight and share key AFH-findings with the audience.
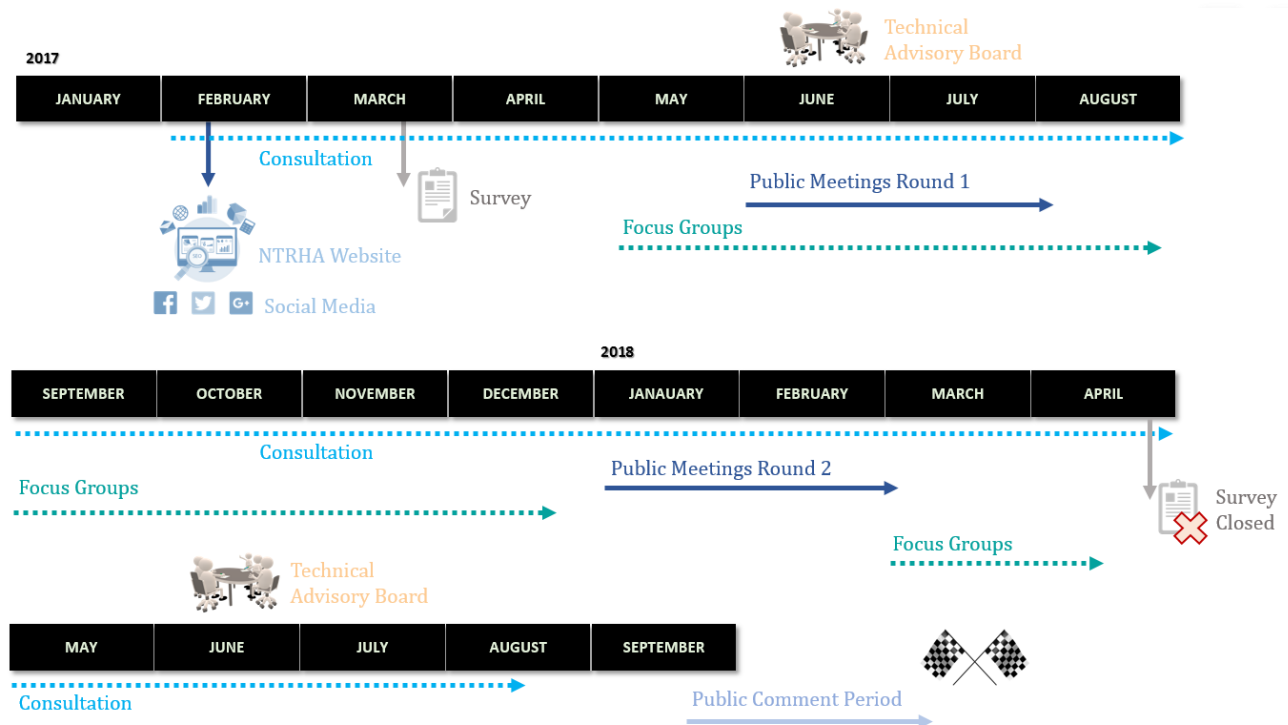
Figure 1: Public participation structure and timeline

Continuous public engagement began with the development of the **NTRHA website** (www.northtexasrha.com) in mid-February 2017. Viewers had the option to translate the site into over 100 languages (including Spanish and Chinese). The website was information-rich and presented in terms easily understandable to the general population (non-experts in housing). NTRHA updated the website with times and locations of public meetings and focus groups throughout the length of the project and posted relevant presentations, videos and links to keep the community up to date with the project progress. The website also contained links to HUD guidelines, media mentions and other relevant information.
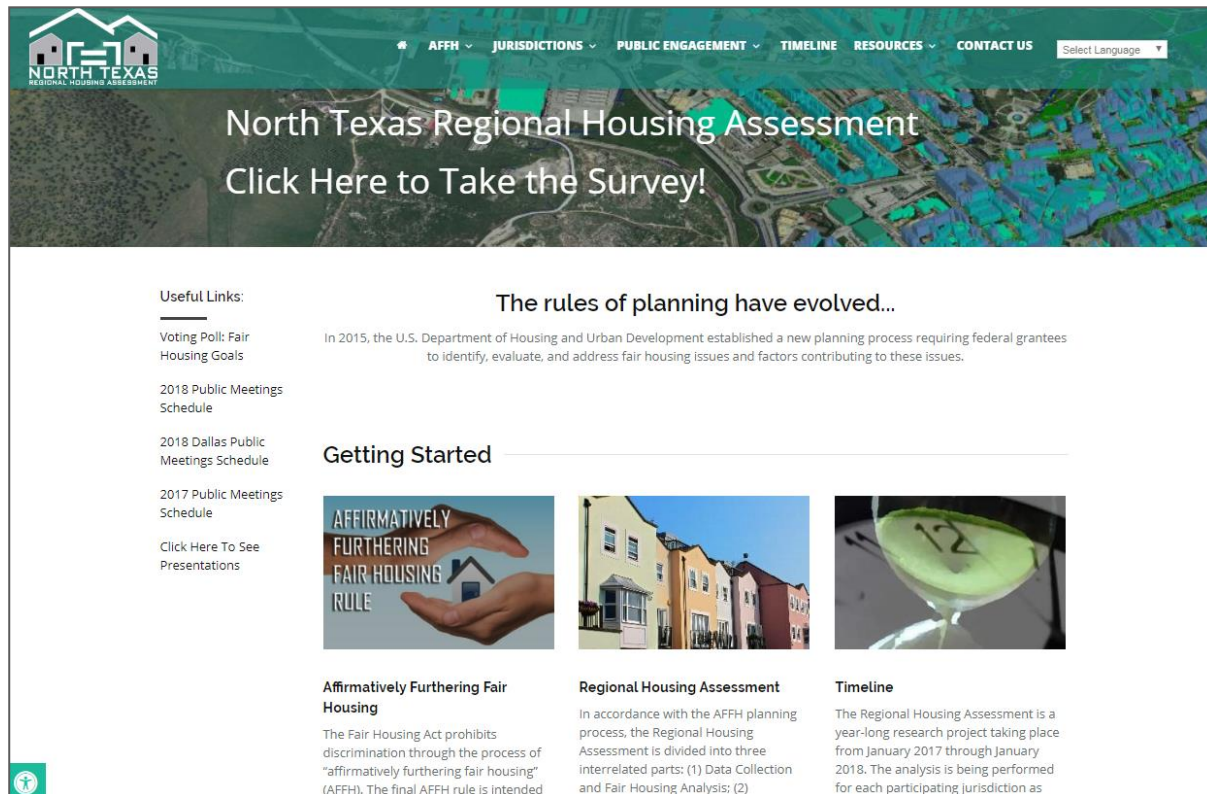
Figure 2: NTRHA Website

NTRHA launched a Facebook page and a Twitter account early in the project (January/February) to share AFH-related information and resources such as links to the survey, public meeting dates and locations, and updates on the NTRHA process and timeline. These tools proved useful for immediate updates and promoting public engagement. The Facebook page garnered approximately 120 "likes" overall and achieved additional engagement through sharing and "liking" individual posts. The NTRHA used **social media** in a supporting role to other methods of online outreach such as the website and email.

At each stage of the research process, NTRHA updated its online presence (website and social media). This included updates to the data, new surveys and other voting tools such as the draft goals poll initiated during the second round of public meetings.

Figure 3: NTRHA social media platforms

Participating jurisdictions and advocacy groups incorporated links to the NTRHA website and the NTRHA surveys on their websites. These organizations also promoted public meetings and focus groups. Aside from participating cities and housing authorities, other organizations relayed NTRHA-related information. Parties sharing NTRHA-related information included:

- Deaf Network – Housing focus groups for people with ALL Disabilities (deafnetwork.com, 2017)
- D Magazine – Dallas fair housing study won't be stopped by Trump Administration (Macon, 2018)
- University of Texas at Arlington – Aim of assessment study to foster collaboration (Booth, 2017)
- ICP – Getting your fair housing concerns heard – VRO Webinar (ICP: inclusive communities project, 2017)
- National Apartment Association – DFW Continues Regional Assessment (NAA: National Apartment Association, 2018)
- Community for Permanent Supported Housing – NTR Fair Housing Assessment Meetings (Community for Permanent Supported Housing, 2018)
- CPSH – Across DFW: Assessment of Fair Housing (CPSH, 2017)

Efforts were made throughout the project to engage populations that are typically underrepresented in the planning process such as persons who are limited English proficient (LEP) and persons with disabilities. The NTRHA research team utilized a variety of tools, available in Spanish (dominant LEP population in Dallas), and conducted public meetings in every council district to maximize engagement opportunities (Figure 4).
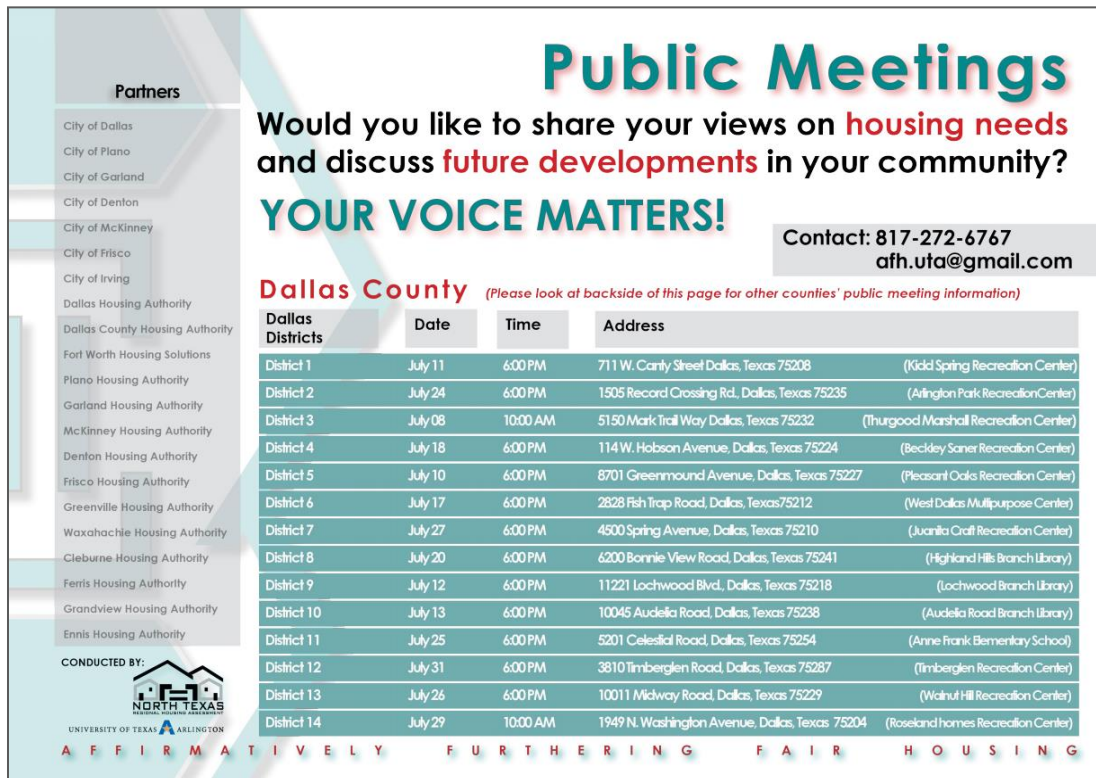
Public meetings and focus groups were held in public libraries and community centers to ensure that all residents, including persons who lived in R/ECAPs and low-income residents, had greater access to participate. The research team also leveraged relationships with community leaders and local organizations to encourage participation. Community organizations assisted the NTRHA research team in keeping the public informed on upcoming meetings and focus groups, as well as by distributing the survey through their respective networks.

b. Public Meetings

Public meetings were conducted in two rounds. The first public meetings held in 2017 were designed to present HUD data and get community input on contributing factors to barriers to fair housing. The UTA research team conducted the meetings in partnership with staff from the City of Dallas, the Dallas Housing Authority (DHA) and the Dallas County HA. The staff members were available to distribute fair housing-related brochures and information and address any questions.

The first round of 2017 meetings consisted of a short overview of the Assessment of Fair Housing and the Affirmatively Furthering Fair Housing Rule (AFFH) followed by an overview of the HUD data. A question and answer exchange followed with the audience regarding fair housing issues in Dallas and North Texas. Attendees were asked to identify contributing factors to fair housing challenges and were encouraged to provide comments/insight and share their view on these factors. (Presentation slides and posters were also posted online and are included in the Appendix.)

Thirty-eight public meetings were conducted as a collaboration between the City of Dallas and the Dallas and Dallas County HAs. A meeting was scheduled in each Dallas council district and public housing community (DHA). The figure below displays the dates, times, locations, number of attendees and whether the site was within a ZIP code that included racially and ethnically concentrated areas of poverty (R/ECAPs). A total of 400 persons attended public meetings. All meetings were held in physically accessible buildings. Spanish language surveys and interpreters were made available at each of the community meetings to ensure that the limited English proficiency population was supported.

Figure 4: NTRHA public meetings flyer

Public meeting were advertised using the following strategies:

- Published by the City of Dallas, Dallas Housing Authority and Dallas County Housing Agency, in The Dallas Morning News
- Posting on www.northtexasrha.com
- Flyers prepared and distributed in English and Spanish to HAs' properties, nonprofit organizations providing social services, libraries, advocacy/civil rights organizations (e.g., LULAC, NAACP, Inclusive Communities Project) and public libraries
- Emails with flyers to distribution lists of the several nonprofit service providers
- Distribution of information at neighborhood association meetings coordinated by City of Dallas
- NTRHA social media and mass emails to listserv
- Posting on Nextdoor.com

c. Focus Groups

Eighteen focus groups were scheduled on behalf of the City of Dallas and the Dallas Housing Authority and Dallas County. Most of the focus groups targeted a specific group of stakeholders (i.e. nonprofits, developers) and/or locations (i.e. R/ECAP, gentrifying areas) and often focused on a preeminent fair housing issue (i.e. disproportionate housing needs, access to opportunities).

Focus groups were advertised through the following strategies:

- Posted at www.northtexasrha.com
- Posted flyers at housing facilities in English and Spanish
- Flyers distributed during public meetings
- Email and phone call recruiting by NTRHA researchers
- Emails to nonprofit service provider network
- Publicizing by City of Dallas, Dallas Housing Authority Dallas and Dallas County HA

Figure 5: NTRHA focus groups flyer

Key targeted focus groups

Red Bird area
City Square and homeless population
LGBTQ
CHODOs and Nonprofit Developers
Individuals with Disabilities
Seniors
Gentrifying areas/LEP
Oak Cliff

d. Surveys

An initial short survey was developed to allow respondents to share their views, concerns, priorities and level of satisfaction as it pertains to fair housing and other issues related to quality of life topics (transportation, health, community needs). The survey was later coupled with an additional questionnaire capturing socio-demographic information, as well as tenure and employment status. Finally, the survey was expanded to include fair housing enforcement-related questions. [See Appendix]. More than 1,500 surveys were collected, which includes surveys collected via the NTRHA website.

e. Consultations

Consultations (interviews, meetings, tours) were conducted with key informants and subject matter experts. Subject matter experts were identified with the help of the City of Dallas, the Dallas Housing Authority, Dallas County Housing Agency and research by NTRHA staff. A list of all the organizations with whom researchers consulted is included in the following section.

City of Dallas, Dallas Housing Authority and Dallas County staff resources:

- Office of Budget
- Economic Development
- Housing and Neighborhood Services
- Neighborhood Plus
- Immigration Services/Integration
- DHA Board
- DHA Resident Advisory Board
- Dallas County Execs
- Community Development Commission
- Housing and Economic Development Committee
- Dallas Poverty Task Force

National/State/Regional Resources:

- Center for Public Policy Priorities: Dick Lavine, Senior Fiscal Policy Analyst; Dr. Frances Deviney, Director of Research
- State Rep. Eric Johnson, housing legislative strategies
- National Low Income Housing Coalition
- Inclusive Community Project
- Texas Low Income Housing Information Service:
- University of Texas Law School: Kelly Haragan, Environmental Clinic Director
- Dallas Women's Foundation: Dena Jackson, Director of Programs and Research
- bcWorkshop
- Texas Civil Right Project: Wallis Nader, attorney
- NTRHA Technical Advisory Board
- University of Kansas: Dr. Kirk McClure, AFH researcher
- Gateway Planning: Brad Lonberger, Principal Planner
- Community for Permanent Supportive Housing: Robin LeoGrande, President

Further input was collected via email.

d. Technical Advisory Board

The NTRHA research team also established a technical advisory board that met twice during the project. The first meeting was held June 28, 2017, to present the project study plan and get input from the board on important issues to address throughout the study. The second meeting was June 8, 2018, to discuss the draft goals and strategies developed by each jurisdiction and get feedback. Table 2 below lists the organizations and their representatives participating in the technical advisory board. The technical advisory board includes representatives of advocacy organizations for protected groups and related industries. Technical advisory board members also attended other NTRHA public engagement events and participated in individual consultations.

Table 2: NTRHA Technical Advisory Board

NTRHA Technical Advisory Board	
Organization	Representative
Coalition of Texans with Disabilities	Dennis Borel, Executive Director
Dallas Women's Foundation	Dena Jackson, Director, Research and Programs
Federal Reserve Bank	Roy Lopez, Community Development Officer
Habitat for Humanity	Latosha Herron-Bruff, VP Homeowner Services
Legal Aid of Northwest Texas (LANWT)	Nancy Jakowitsch, Attorney; Supawon Lervisit, Attorney
League of United Latin American Citizens (LULAC)	Lee Saldivar, President
Metro Dallas Homeless Alliance (MDHA)	Cindy Crain, Executive Director
National Association for the Advancement of Colored People (NAACP)	Tim Robinson, Housing Chairman
North Central Texas Aging and Disability Resource Center	Marty Mascari, Collin County Project Coordinator
Rehabilitation, Education and Advocacy for Citizens with Handicaps (REACH)	Charlotte Stewart, Executive Director
Texas Organizing Project (TOP)	Brianna Brown, Deputy Director
Texas Low Income Housing Services	Adam Pirtle
The Real Estate Council (TREC)	Linda McMahon, President
Texas Workforce Commission (ex officio member)	Lowell Keig, Director, Civil Rights Division

2. **Provide a list of organizations consulted during the community participation process.**

The following table lists the organizations and individuals consulted during the community participation process. Note that, in many instances, individuals and organizations were consulted more than once and as a rule were involved continuously throughout the process.

Table 3: List of organizations consulted

Organization	Attendees	Event/Topic
Building Community (BC) Workshop	Brent Brown, founder; Owen Wison-Chavez, staff; Lizzie MacWillie, Director	Discuss AFH process and research on affordable housing strategies
Center for Public Policy Priorities	Steven Murdock, Rice University, former Texas State Demographer and head of 2010 US Census; Simran Noor, Vice President, Center for Social Inclusion	Board meeting/presentation addressing changing demographics and strategies to discuss social inclusion, racial inequities
Center for Public Policy Priorities	Frances Deviney, Director of Research	Discuss research on women, economic opportunity and housing
Center for Public Policy Priorities	Dick Lavine, Senior Researcher	Discuss policy to address rising property taxes and housing affordability
City Square	Dr. John Slburt, President; other Staff	Tour of Opportunity Center and tiny home development, discussion of affordable housing programs and challenges
Community for Permanent Supportive Housing	Robin LeoGrande, President	Gather information on challenges in housing access by persons with disabilities
Communities in Schools, Dallas Region	Amy Wyatt, Elementary Programs; Dr. Judith Allen, CEO	Discuss at-risk students and programs to mitigate risk
Criterion Development Partners	Pretlow Riddick, President	Discuss barriers to construction of affordable housing
Dallas Women's Foundation	Dena Jackson, Director, Programs and Research	Discuss AFH process and housing issues related to gender
Dallas Women's Foundation	Roslyn Dawson Thompson, President & CEO	Discuss release of Women's Economic Issues Report
Disability Rights Texas	Rachel Cohen-Miller, Attorney; Christopher McGreal, Attorney	Discuss state and municipal policies relating to fair housing for persons with disabilities
Gateway Planning	Brad Lonberger, principal	Discuss planning issues relating to affordable housing
Guardianship Services	Executive Director	Discuss programs available to support very low-income persons with disabilities in housing
Hap Baggett Properties	Hap Baggett	Discuss issues of affordable housing development and neighborhood revitalization
HousingWorks Austin/Federal Reserve Bank of Dallas	Mayor, County Commissioner, researchers, advocates	Housing + Economic Opportunity Summit (conference)
HUD	Beth Van Duyne, Regional Administrator	Discuss barriers to affordable housing and strategies for permanent supported housing
Inclusive Communities Project	Demetria McCain, President; Elizabeth Julian, Treasurer; Michael Daniel, attorney; other staff	Discuss AFH process and barriers to housing
Kilpatrick Insurance	Kim Kilpatrick-Terrell, CEO and landlord	Discuss impact of insurance costs on housing and experience as landlord with publicly assisted housing

Organization	Attendees	Event/Topic
HousingWorks Austin/Federal Reserve Bank of Dallas	Steve Adler, Mayor of Austin; Judge Sarah Eckhardt, Travis County; Rolf Pendall, Urban Institute; other researchers, advocates	Housing + Economic Opportunity Summit (conference)
National Association of Housing and Redevelopment Officials	Subject matter experts from industry and academia, public housing authority executives	Annual Summer Conference focusing on best practices in managing affordable housing
Texas Low-income Housing Information Service	Adam Pirtle, Northwest Texas Director	Discuss AFH data, process, goals
Texas Civil Rights Project	Wallis Nader, Attorney	Discuss impact of probation fees on housing affordability
Texas Legislature	State Rep. Eric Johnson and staff	Discuss recent legislative strategies to address affordable housing
University of Kansas	Dr. Kirk McClure, researcher, Mid-America Regional Council/AFH	Discuss strategies for analyzing voucher use and regional management of HCVs
University of North Texas Health Science Center	Dr. Emily Spence-Almaguer, Associate Dean for Community Health and Health Equity	Discuss issues connecting persons emerging from chronic homelessness with medical services in permanent supportive housing
Congress for New Urbanism, TX	Rik Adamski, President	Discuss AFH process, HUD data and regional collaboration in assessing and addressing housing challenges
Texas Organizing Project	Brianna Brown	Discuss AFH process, goals and barriers to fair housing
National Fair Housing Alliance	Debby Goldberg Vice President, Housing Policy & Special Projects	Discuss outreach, community engagement strategies and AFH process
Opportunity Dallas	Mike Koprowski, Executive Director Emeritus	Discuss AFH data, process, key findings and strategies to address fair housing challenges in Dallas
Oak Cliff Chamber of Commerce	Members and community leaders	Discuss AFH data and barriers to fair housing
The Commit Partnership	Robert Mundinger, Manager, Data Analytics and Visualization	Discuss AFH data, process, key findings and strategies to address fair housing challenges in Dallas
National Low Income Housing Coalition	Dr. Andrew Aurand, VP for Research	Discuss AFH process, data and analytical tools
Reinvestment Fund	Dr. Ira Goldstein, President, Policy Solutions at Reinvestment Fund	Discussed MVA and AFH methodology and findings
Williams Family Foundation	Garrett Landry Senior Officer, Education Strategies	Discuss AFH key findings, educational disparities and school-related data
Building Community (BC) Workshop	Owen Wilson-Chavez, Lizzie MacWillie	Discuss housing challenges and upcoming State of Dallas Housing report (2018)
National Low Income Housing Coalition	Mike Koprowski, National Campaign Director	Discussed recommended AFH goals and Strategies for Dallas
League of Women Voters of Dallas	Susybelle Gosslee	Discuss AFH key findings, housing needs in Dallas and strategies to address fair housing
MetroTex Association of REALTORS	Andrea Bell, Lei Ann Reeves and workshop attendees	Workshop: Diversity Day for Leadership Academy: discuss fair housing challenges
University of Texas School of Law	Kelly Haragan, Environmental Clinic, Director	Discuss AFH data, process, environmental justice challenges and data sources
North Texas Fair Housing Center	Francis Espinoza, Executive Director	Discuss fair housing enforcement and issues of discrimination
Leadership Dallas, Dallas Regional Chamber	Curt Hazelbaker, President and Chief Executive Officer, YMCA of Metropolitan Dallas	Discuss/present AFH process, findings and issues of segregation and discrimination

Organization	Attendees	Event/Topic
Legal Aid of NorthWest Texas	Supawon Lervisit, Matthew Miller, Stephanie Champion, Attorneys John Hasley, Deputy Director of Litigation	Discuss AFH findings and issues of segregation and discrimination and strategies to address fair housing challenges in Dallas
Collaborative working group led by CPSH Peter B. Kahn Director, Economic and Market Analysis Division - U.S. Department of Housing and Urban Development Katy Lopez-Daniel & Beshara, P.C Adam Guerra, Molina Healthcare Beverly Davis, Fair Housing and Human Rights, City of Dallas Brianna Adams, Independent Bank Carrie Parks, Metrocare Services Cindy Patrick, Meadows Foundation Commissioner Daniel, Dallas County Commissioner David Mintz, Texas Apartment Association Dena Jackson, Dallas Women's Foundation Edd Eason, CitySquare Erin Moore, Office of Dallas County Commissioner Irene Niemotka, CPSH Jacky Sylvie, CPSH James McClinton, Metro Dallas Homeless Alliance Jason Simon, Apartment Association of Greater Dallas Joseph Dingman, Catholic Housing Initiative Kathy Carlton, Apartment Association of Greater Dallas Kenn Webb, Dallas Citizen Homeless Commission Maricela Martinez, United Healthcare - Community Plan Mike Koprowski, Opportunity Dallas Dr. Myriam Igoufe, Dr. Stephen Mattingly, Dr. Ivonne Audirac, NTRHA, UT Arlington Peggy Shadduck, University of North Texas & CPSH Ray Charles Gulley, RC Gulley Consulting Sheila Shelton, Molina Healthcare Thomas Lewis, Dallas County Housing Sheila Shelton, Molina Healthcare	Discuss AFH findings on R/ECAP and segregation issues as they relate to HCV residential patterns and potential SAFMR survey methodology to enhance competitiveness of vouchers
CHODO and Non Profit Developers City Wide Community Development Corporation Intercity Community Development Corporation East Dallas Community Organization South Dallas Fair Park Community Development Corporation Builders of Hope Community Development Corporation Habitat For Humanity Frazier Community Development Corporation		Discuss barriers to affordable housing development

Table 4: NTRHA Technical Advisory Board

NTRHA Technical Advisory Board	
Organization	**Representative**
Coalition of Texans with Disabilities	Dennis Borel, Executive Director
Dallas Women's Foundation	Dena Jackson, Director, Research and Programs
Federal Reserve Bank	Roy Lopez, Community Development Officer
Habitat for Humanity	Latosha Herron-Bruff, VP Homeowner Services
Legal Aid of Northwest Texas (LANWT)	Nancy Jakowitsch, Attorney; Supawon Lervisit, Attorney
League of United Latin American Citizens (LULAC)	Lee Saldivar, President
Metro Dallas Homeless Alliance (MDHA)	Cindy Crain, Executive Director
National Association for the Advancement of Colored People (NAACP)	Tim Robinson, Housing Chairman
North Central Texas Aging and Disability Resource Center	Marty Mascari, Collin County Project Coordinator
Rehabilitation, Education and Advocacy for Citizens with Handicaps (REACH)	Charlotte Stewart, Executive Director
Texas Low Income Housing Services	Adam Pirtle
Texas Organizing Project (TOP)	Brianna Brown, Deputy Director
The Real Estate Council (TREC)	Linda McMahon, President
Texas Workforce Commission (ex officio member)	Lowell Keig, Director, Civil Rights Division

3.	***Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?***

Effectiveness of Outreach Activities

Community participation, in terms of the number of people engaged, exceeded average industry standards for an assessment of such magnitude, geographically and topically. All input was sought and incorporated in meaningful ways: each public participation strategy and tool was designed to fit each stage of the assessment (i.e. identification contributing factors, vetting fair housing goals, prioritizing issues) and to maximize participation.

The UTA research team strategically leveraged existing local knowledge and relationships to maximize community outreach by incorporating the suggestions of staff from the City of Dallas, the Dallas Housing Authority, the Dallas County Housing Agency, industry experts and community leaders. The UTA research team is confident that the insights captured through public participation efforts are representative of the diverse voices found throughout Dallas and the region.

The surveys proved to be useful tools for widespread input. They were available online and distributed at community events, public meetings, focus groups, public places and disseminated through City, HAs and community networks. These surveys allowed individuals to participate on their terms rather than being restricted to physically attend a public meeting to give input. The diverse comments gathered in the surveys were instrumental to further contextualize and substantiate the data analysis and fair housing goals components of the assessment.

The most fruitful engagement methods were the targeted focus groups and the two rounds of public meetings. The purpose of the public meetings was to present HUD data, get community input on contributing factors to barriers to fair housing and collect feedback on the proposed fair housing goals. A large number of public meetings were held and these meetings attracted standard levels of attendance and the rooms were filled with members of the Dallas community who were eager to engage with the data and talk about their housing experiences.

While intensive efforts and resources were dedicated to recruiting participants for focus groups, securing of participants proved challenging. Several focus groups were scheduled but not conducted because of the lack of participants. The intended focus on underrepresented populations, which very often are difficult to reach, contributed to the challenges faced in securing participants. The UTA researchers found that it was more effective to recruit participants by partnering with community organizations and/or by leveraging existing meetings. This approach also allowed the research team to engage with participants and population groups not typically included fair housing analysis. For instance, by leveraging local community networks, two successful regional focus groups were conducted in partnership with the Community for Permanent Supported Housing involving many participants who might not be conventionally comfortable in participating in discussion groups.

Successfully conducting the focus groups provided critical input from local/community organizations and effectively engaged underrepresented populations with diverse housing experiences. Focus groups notably engaged seniors, persons with disabilities, the LGBTQ community, homeless individuals, communities in R/ECAPs and developers.

The UTA research team received comments and questions regarding the public participation process and notification strategy throughout the public participation process. Researchers prioritized outreach strategies to maximize reach and widen the possibility of diverse input, within its constraints. Efforts were made to include all populations, neighborhoods and other groups; none were intentionally excluded. As the assessment progressed, the research team continuously adjusted outreach strategies to address gaps.

Strategies to Improve Community Participation

To maximize community input, the UTA research team developed an online polling to gather feedback and allow respondents to vote on the importance of each suggested fair housing goal. There was little engagement in online polling, which the research team suspects could be the result of the difficulties inherent in providing sufficient written narrative or explanation online that would allow the community to vote with confidence. Budget and time constraints did not allow for the presentations to be videotaped and placed online, but doing so in future efforts would give community members a common vocabulary and base of knowledge that would allow for increased participation in the online polling platform.

The UTA research team acknowledges that social media (Facebook/Twitter) was not leveraged to the fullest extent possible to increase public meeting attendance due to constraints in time, budget and staffing resources. Utilizing social media more frequently and boosting engagement through "paid posts" and other methods could widen the reach among populations who have online access. Social media resources were redirected into other outreach methods that proved more effective in reaching specific protected class groups.

The provision of incentives (transportation support, food, raffle prizes) as well as addressing the needs of the LEP population beyond Spanish-speaking individuals could have increased participation.

Attendance for the second round of public meetings was slightly lower than the first, although the meetings were publicized through the same traditional media outlets, social media, printed flyers and community organizations. The UTA researchers also communicated with individuals who expressed interest in updates on the research by using email addresses obtained from focus group/public meeting sign-in sheets, surveys and any written comments to recruit for second-round meetings. Lower attendance could be attributed to the fact that the first round of public meetings was in the summer and the second round was in the winter. The North Texas region experienced unprecedented rain and near-freezing temperatures in February 2018, making it difficult for some individuals to leave home and travel to a public meeting. Another reason could be that all interested parties felt that they had already given sufficient input. In the future, this could be remedied by more accurately explaining the difference in the public meetings. Despite publicly announcing that the assessment would not be canceled, residents and stakeholders explained that the changes and challenges surrounding the AFFH rule and required conduct of the AFH contributed to the confusion of the general public on whether to continue to engage in the process.

In all, the NTRHA group is pleased with the quality, diversity and depth of public engagement and outreach activities conducted throughout the AFH process.

4.	*Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.*

The UTA research team meaningfully engaged the community using a variety of tools and venues, which included public meetings, consultation, focus groups, surveys, comment boards, phone calls and email.

In addition to the written comments received directly from participants, notes were taken at each public event and consultation by UTA researchers and loaded into qualitative analysis software for coding and summarization (Sociocultural Research Consultants, LLC, 2018). All data was analyzed and sorted into the seven issue areas and associated contributing factors provided by the AFH tool. Comments were sorted based first on their context, i.e. the question or material provided by the researcher, and second, by the contributing factor to which they related. These results directly shape the contributing factors and fair housing prioritization process, as well as the formulation of fair housing goals for Dallas. Comments from public engagement activities are used throughout this report to illustrate, substantiate and contextualize AFH findings.

The following section is a general summary of the public input, including quotes, received throughout the NTRHA process.

Contributing factors to segregation

- Discrimination
    - Community opposition
        - Not In my Back Yard: "affordable housing brings crime".
        - The conditions in segregated areas are the result of behaviors and choices made by the individuals living there
    - Source of income discrimination/Private Discrimination
        - Deters relocation to non-segregated areas
        - Apartment complexes report different availability/vacancy of units to individuals of different races
- Loss of affordable housing and location of affordable housing
        - Apartment complexes were demolished to build new apartments out-of-reach for low-incomes, pushing the residents out
- Lack of investments and revitalization strategies
        - Investments in poverty areas were insufficient and inadequate, pointing to the "historic disinvestment" in these areas
        - Location of proficient schools and **school assignment policies**: "nice schools go right in line with the wealth of the area"

Contributing factors of R/ECAPs

- Lack of investments and revitalization strategies
        - The lack of amenities, lot vacancies and deteriorated properties in neighborhoods perpetuate these housing issues
        - "The only *(type of)* investments in R/ECAP areas is more low-income housing"
- Location and type of affordable housing
        - Participants stated that affordable housing tend to be concentrated in the same areas, which inevitably concentrates poverty
        - Residents explained that the poverty concentration, resulting from affordable housing sitting decisions, is further reinforced by the lack of access to transportation and jobs for the residents of these neighborhoods
- Discrimination and community opposition
        - Landlords 'prerogative to refuse vouchers significantly contributes to the issue of R/ECAPs by prohibiting voucher holders to relocate to low-poverty areas.
        - "Not In My Back Yard"

Contributing factors to disparities in access to opportunity

- Lack of investments and revitalization strategies and crime
        - There is a lack of development and investment in retail, a lack of employment and basic infrastructure, which in return, prevents investments
        - The lack of affordable transportation options and high-performing public transit further deepens neighborhood equities
- Discrimination

- Landlords' prerogative to refuse vouchers significantly contributes to disparities by prohibiting voucher families to access opportunity-rich areas
- Residents expressed their concerns about the inequitable and limited housing options that formerly incarcerated individuals must face
  - Location of proficient schools
    - Participants attributed residential patterns of economic segregation to the real estate premium associated with access to good schools
  - Environmental Health Hazard
    - Participants expressed their concerns regarding the presence of environmental health hazards and negative impact on residents' health and a neighborhood's ability to attract investments

Contributing factors to disproportionate housing needs

- Loss of affordable housing, gentrification and rising cost of housing
  - A great majority of residents reported facing "unacceptable" taxes increases
  - Residents expressed their concerns regarding the growing demolition trend and conversion of affordable housing into high-end apartments
- Lack of investments and lack of code and law enforcement
  - Lack of code enforcement and resulting dilapidated homes continue to not only deter families from moving in but also private investments to occur
  - Greater law enforcement and police coverage would effectively deter crime and contribute to overall community safety
- Discrimination
  - Participants expressed the obstacles they faced in accessing and securing financial support
  - "Why can't bank give more loans to help people move for improvement", "lending institutions don't give the public the information they need"
- Aging homes, need for major repairs and failure from landlords to maintain properties up to code
  - Residents explained facing major foundation issues and continue to struggle to secure funding to repair their homes
  - There is a lack of funding option to address these issues, especially for seniors

Contributing factors to barriers to publicly supported housing

- Site selection policies and decisions, discretionary aspects of qualified allocation plans (QAP) and other programs, and other practices
  - There is a continuous concentration of publicly supported housing in the same areas
  - Investments going into high-poverty areas are inadequate
  - There is a lack of deep income targeting under the current city programs
- Loss of affordable housing, gentrification and rising cost of housing

- "We can't talk about affordable housing while in Dallas, it simply does not exist"
- Residents expressed their concern about the lack of housing options for low-income families and people on fixed income such as individuals with disabilities.
- Lack of quality affordable housing information programs
  - The lack of easy access to information greatly contributed to families not taking full advantages of their rights
- Lack of investments and lack of law enforcement
  - The risk of crime is high; it deters private investments and families to move in

Contributing factors to barriers for people with disabilities

- Lack of access to transit
  - Para-transit service is not reliable or customer-friendly
  - Public transit vehicles do not have spaces that fit modern wheelchairs, especially those that are electrically operated and have additional adaptive equipment; not enough space for multiple wheelchairs
  - Transit services provided by public schools are great but end just when young people need them to become independent and employed, especially after their guardians pass away
  - Limited access to transportation for food shopping for seniors
- Lack of affordable in-home and community-based supportive services
  - Many people with disabilities require in-home services, including 24-hour live-in
  - Caregivers are paid only $8-$9 per hour, making it difficult to recruit and retain qualified staff for in-home assistance
  - Group homes provide inadequate levels of service, including limitations on independence and the ability to participate in activities in the community
  - Assisted living communities start at $3,500 per month, far above the income of persons living on SSI and SSDI
  - What we need is a village within the larger community where we can help each other and share supportive services
  - Need to maintain housing and independence: medical support, especially in-home or community monitoring for emergencies; supervision for safety; assistance to get out of bed, dress and prepare to leave the home for employment or other community activities; day activity programs to prevent isolation and support community integration; legal support and guardianship-type services that enable supported decision-making and choice
  - Texas Medicaid waiver programs do not provide sufficient supportive services
- Inaccessible public and private infrastructure
  - Handicapped parking spaces do not fit modern van ramps
  - Most single-family neighborhoods not designed for walkability (no sidewalks), and that impacts people with disabilities and those aging in place
  - Side streets largely inaccessible
  - Not enough accessible public bathrooms – often used by people who don't need them

- o Sidewalks, crosswalks, crossing signals inaccessible and bar access to transit stops
- Lack of affordable, accessible housing in a range of sizes
  - o Lack of housing that allows persons with disabilities to live together with their families in the community
  - o Emergency shelters lack sufficient, accessible facilities that allow families to stay together
  - o Persons with disabilities have incomes of $735 to $1,000 per month – no housing available that is affordable at these incomes ($300 to $400 per month)
  - o LIHTC properties are not being built with enough accessible units
  - o Group homes require residents to share bedrooms (no privacy), and many rooms are not big enough for persons with wheelchairs and other adaptive equipment
  - o Persons with disabilities often suffer from job loss and loss of income creating barriers to affordability; my son was bullied and had to quit; not enough companies are willing to make accommodations; too many jobs for persons with disabilities pay piece rate that tops out at minimum wage
  - o Even with a "gifted" home, persons with disabilities unable to afford property taxes and maintenance
- Lack of assistance for housing accessibility modifications
  - o People don't know how to go about requesting modifications
  - o Waiting list to get a ramp built by a nonprofit is one year
- Access to publicly supported housing for persons with disabilities
  - o Assisted living facilities have rules that prevent family members from living with persons with disabilities for support
  - o Very difficult to get into housing programs
  - o Funding cuts keep supply below the need
  - o When housing subsidy becomes available (voucher), there are no accessible units located near services or adjacent to public transit
  - o For some with Social Security and VA benefits, income may be too high to qualify for housing program but too low to afford market rate housing
  - o LIHTC restricted rents are too high to be affordable for people on SSI, SSDI – rents are $700 per month and landlords require double or triple deposits – rents below $700 have one- to two-year waiting lists
- Access to proficient schools
  - o Need more post-secondary schools, programs that provide job training for persons with disabilities, including intellectual and developmental disabilities (IDD)
  - o Need more supportive services on campuses for persons with disabilities
  - o Public school class sizes were too large for our daughter and their expectations were too low
- Lack of affordable, integrated housing for individuals who need supportive services
  - o While community integration is preferred, it can be isolating – hard to find other people with disabilities to interact with – need services and supports to overcome isolation
  - o Don't want to have to live in a nursing home when I can be independent just because I can't find affordable housing
  - o Many nursing homes will not accept patients who are ventilator dependent, forcing them to move out of their home community – home-based community care more desirable and effective
- Lack of assistance for transitioning from institutional settings to integrated housing

- o You have to have accessible, affordable housing to transition to that can support the adaptive and supportive equipment you need – tough to find
- Inaccessible government facilities or services
  - o Parking spaces at City Hall and other public facilities don't fit a seven-foot van ramp – have to use two parking spaces
  - o New public coliseum is being built for 18- to 35-year-olds without disabilities
  - o Can get positive responses to requests for accommodations or accessible programs in public facilities but it takes a long time and a lot of activism
- Lending discrimination
  - o Too hard to get mortgage when you have limited stable income from wages or salaries

Contributing factors to barriers to fair housing enforcement

- Resources (staff, budget, etc.) for fair housing enforcement agencies and organizations
- Local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.)

Short Survey Results

The following charts summarize the results of surveys received from participants at Dallas, Dallas Housing Authority and Dallas County Housing Agency public meetings and focus groups and residents who have completed surveys online.

Respondents ranked four types of housing needs from 1 to 5 with 1 indicating most important and 5 indicating the least important. Not all need types received a rank from every respondent. The table below shows that housing affordability received the greatest number of responses (1,030), and Figure 6 shows it also received the greatest proportion of rankings (73%) as the most important housing need. Housing quality received the next most responses (765) and the next highest proportion of rankings as most important (44%).

Table 5: Survey Results: Greatest Housing Need

Greatest housing need?	Total Votes
Housing Affordability (monthly cost)	1,030
Housing Availability (range of unit size)	857
Special Accommodations (disability)	771
Housing Quality	765
Other	104
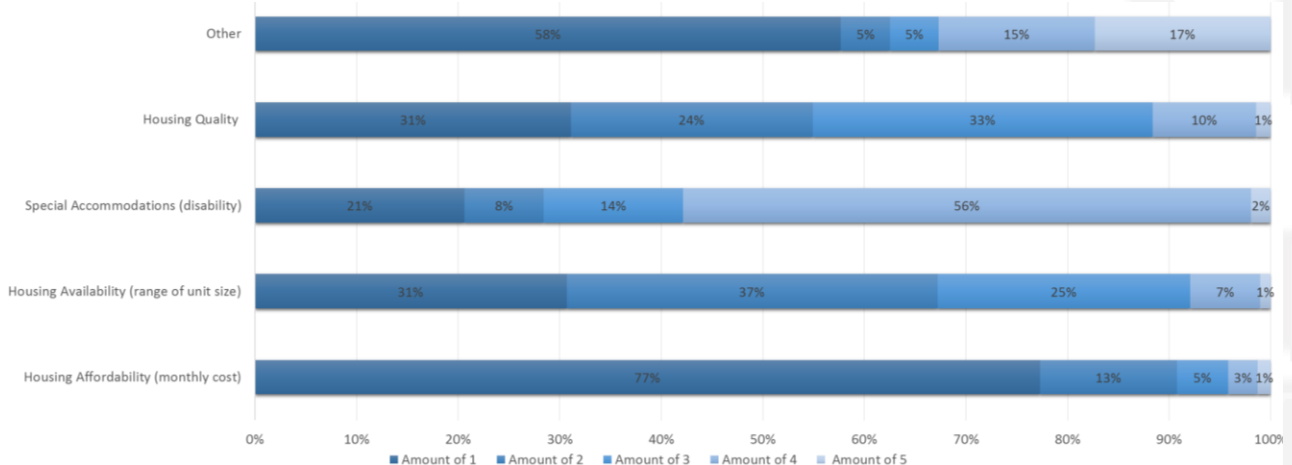
Figure 6: Greatest housing need ranking results

Respondents were asked to rate their satisfaction with their current housing situation on a scale from 1 to 5 with 1 indicating that they were very satisfied and 5 indicating that they were not at all satisfied. The following figure displays the number and percent of responses for each level of satisfaction. Twenty-seven percent of respondents said they were very satisfied with their current housing situation while 60% rated their satisfaction 3 or below.

How satisfied are you with your current housing situation?
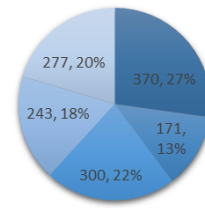
■ Amount of 1   ■ Amount of 2   ■ Amount of 3   ■ Amount of 4   ■ Amount of 5

Figure 7: Housing situation satisfaction survey results

Respondents ranked characteristics of public transportation from 1, indicating most important, to 6, indicating least important. Respondents included transit users and non-users and did not necessarily rank every transportation characteristic. The following table displays total responses and responses of transit users only. Affordability was most frequently ranked as most important. Reliability ranked second in importance for users, and service areas ranked second for non-users.

Table 6: Transportation greatest need survey results

Transportation characteristics	Total votes	Public transit users only
Affordability	605	514
Reliability	578	359
Accessibility near house and work	378	282
Serviced areas	513	385
Hours of services	441	346
Time to reach destinations	448	345

■ Amount of 1   ■ Amount of 2   ■ Amount of 3   ■ Amount of 4   ■ Amount of 5   ■ Amount of 6
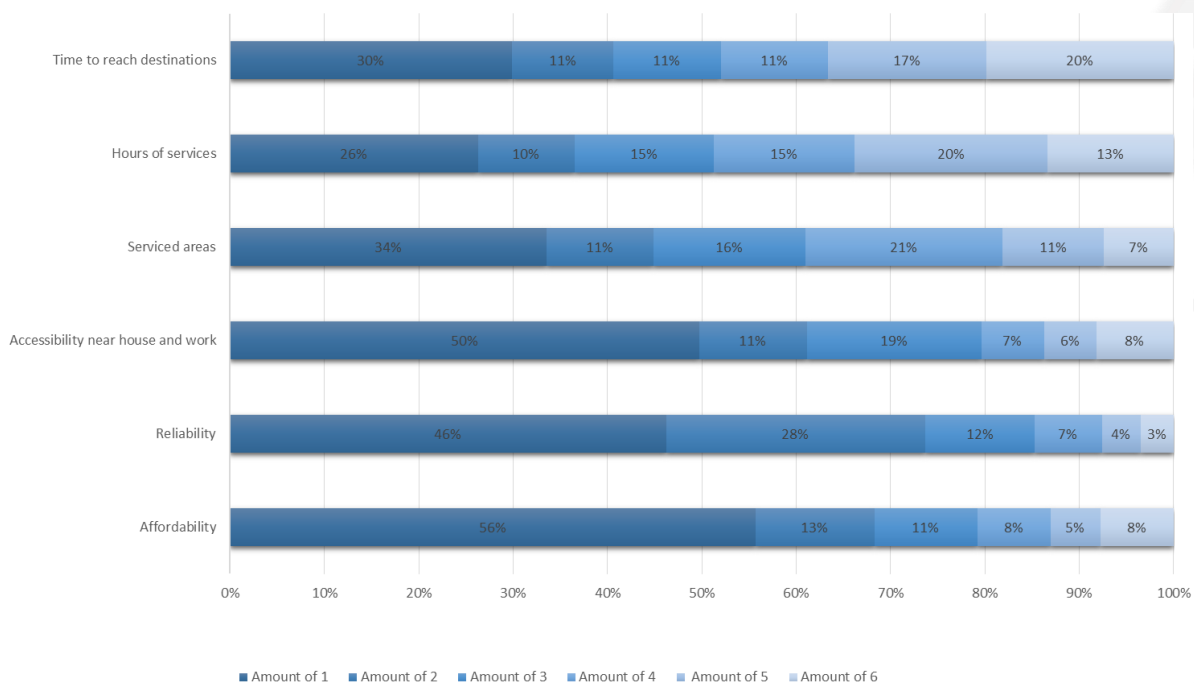
Figure 8: Transportation characteristics ranking results

The figure above displays, for each transportation characteristic, the distribution of relative importance. Affordability and accessibility (from/to home and work) each ranked as the most important more frequently than other public transit characteristics. Also, respondents were asked to rate their satisfaction with current transportation options on a scale from 1 to 5 with 1 indicating very satisfied and 5 indicating not satisfied at all. Thirty-four percent said they were very satisfied while another 34% rated their satisfaction 4 or 5, as displayed in Figure 9.

How satisfied are you with current transportation options?
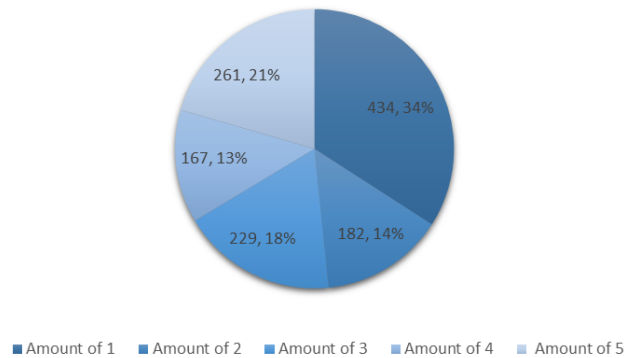
Figure 9: Transportation situation satisfaction survey results

Respondents ranked six selected characteristics of neighborhoods and "other" in order of importance with 1 indicating most important and 7 indicating least important. The figure below shows that safety and access to quality education in low-poverty neighborhood received the highest number of responses, 948 and 824, respectively, followed by economically integrated neighborhoods (767).

Table 7: Top neighborhood characteristics survey results

Neighborhood characteristics	Total Votes
Low poverty neighborhood	824
Healthy Neighborhood	122
Safety	948
Access to quality education	749
Racially integrated neighborhoods	591
Economically integrated neighborhoods	767
Access to employment opportunities	664
Transportation options and affordability	727
Other	87

By far, "safety", as a neighborhood characteristic, received the greatest proportion of rankings of 1 (most important) and 2 (combined amounting to over 90%). Access to healthy neighborhoods received the next highest proportion of 1 and 2 rankings (72%).

Other neighborhood characteristics received a large number of votes, such as access to quality education, to employment opportunities and to affordable transportation options. Overall, these neighborhood characteristics were primarily assigned rankings from 1 to 4. From this set of neighborhood characteristics, access to quality educational opportunities received a high number of ranked votes 1 and 2 (combined 62%).

What neighborhood characteristics are the most important to you?

	Amount of 1	Amount of 2	Amount of 3	Amount of 4	Amount of 5	Amount of 6	Amount of 7	Amount of 8
Other	64%	10%	5%	3%	3%	2%	6%	6%
Transportation options and affordability	24%	10%	10%	12%	13%	12%	17%	1%
Access to employment opportunities	23%	11%	16%	14%	15%	15%	5%	1%
Economically integrated neighborhoods	27%	14%	16%	15%	15%	9%	3%	1%
Racially integrated neighborhoods	19%	8%	15%	17%	16%	13%	11%	1%
Racially and economically-integrated neighborhood	23%	21%	18%	13%	14%	11%	0%	
Access to quality education	30%	32%	15%	7%	6%	5%	3%	1%
Safety	84%	7%	3%	2%	1%	1%	2%	1%
Healthy Neighborhood	56%	16%	11%	11%	5%	1%	0%	
Low poverty neighborhood	25%	10%	15%	11%	9%	13%	15%	1%

Figure 10: Neighborhood characteristics ranking results

The following charts describe the demographic characteristics of the respondents willing to complete demographic surveys at public meetings, focus groups and online. As a reminder, respondents included community leaders, advocates and stakeholders in addition to families needing affordable housing.

- Female (87%)
- Hispanic (74%)
- Black (86%)
- Single (73%)
- Have a college degree (12%)

- Employed (44%)
- Annual incomes of less than $35k per year (91%)
- Own their home (92%)

What is your gender?
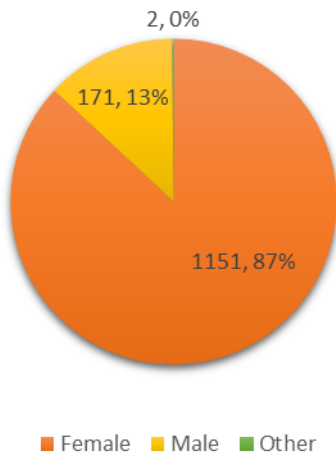
What is your race/ethnicity?
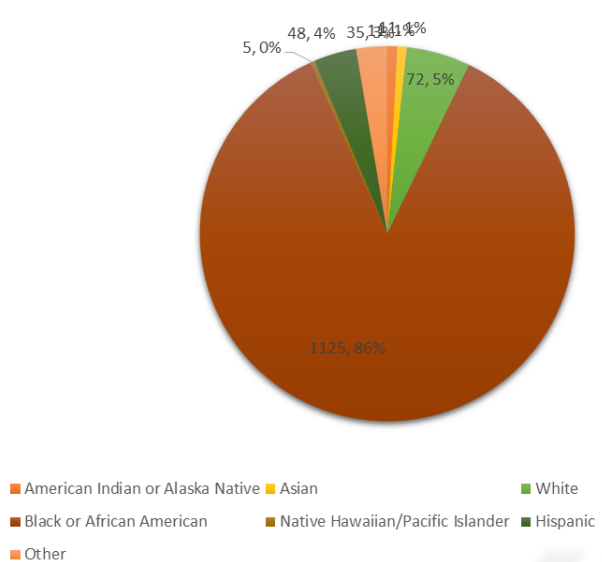
What is your marital status?
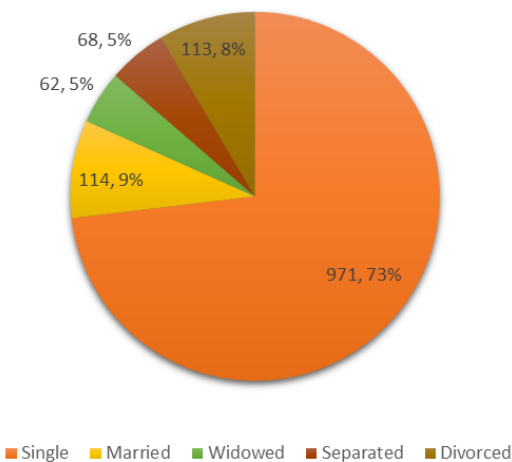
Are you Hispanic, Latino and/or of Spanish origin?
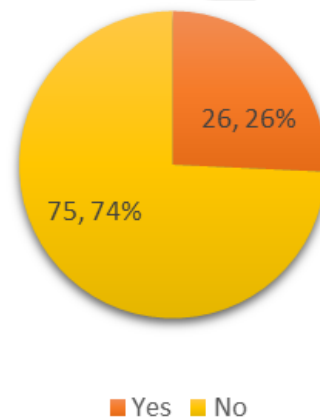
Figure 11: Survey respondents by gender, race/ethnicity and marital status

What is the highest level of school you have completed or highest degree you have received?
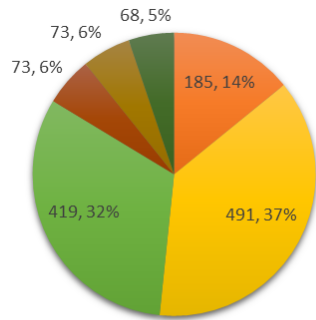
- Less than high school degree
- High school degree or equivalent
- Some college but no degree
- Associate Degree
- Bachelor degree
- Graduate degree

Which of the following categories best describes your employment status?
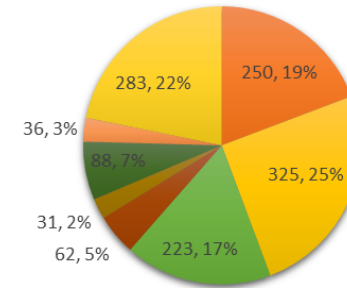
- Employed part time
- Employed full time
- Not employed-looking for work
- Not employed-not looking for work
- Student
- Retired
- Self-employed
- Disabled

What was your total household income before taxes during the past 12 months?
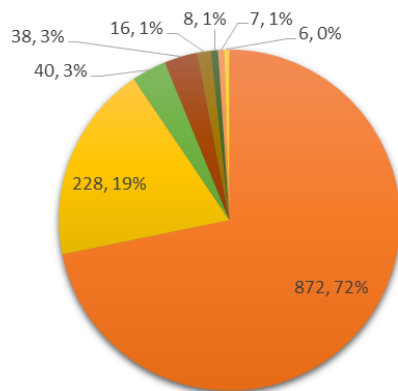
- Less than 20000
- 20000 to 34999
- 35000 to 49999
- 50000 to 74999
- 75000 to 99999
- 100000 to 149999
- 150000 to 199999
- 200000 or more

Do you own a car?
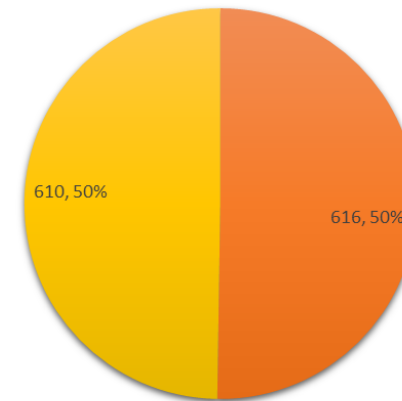
- Yes
- No

Figure 12: Survey respondents by education level, employment status, income, and car ownership

What type of community do you live in?

3, 3%
1, 1%
10, 10%
82, 86%
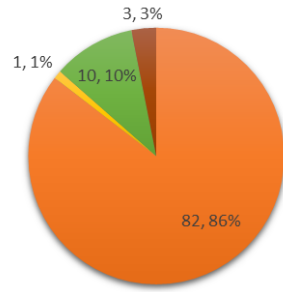
- City or urban community
- Rural community
- Surburban community
- Other

Do you live in a single-family home or in an apartment?

518, 42%
726, 58%
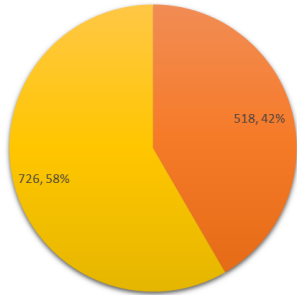
- Single Family Home
- Apartment

If you live in a single-family home, do you rent?

77, 8%
909, 92%

- Rent
- Own

Figure 13: Survey respondents by housing tenure and type
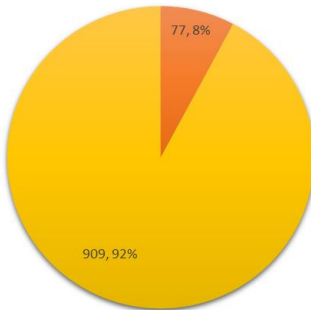
Do you, someone in your household, or someone you provide care for experience any of the

55, 4%
105, 7%
235, 17%
651, 46%
146, 10%
222, 16%
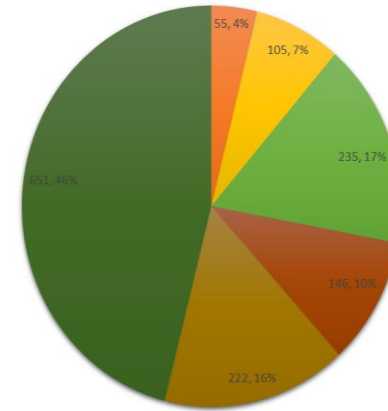
- A hearing problem
- A vision problem
- Any condition that substantially limits one or more basic physical activities
- Any other physical disability
- Any emotinal or mental disability
- Not applicable

Which option below describes your living quarters?

7, 7%
4, 4%
29, 31%
55, 58%
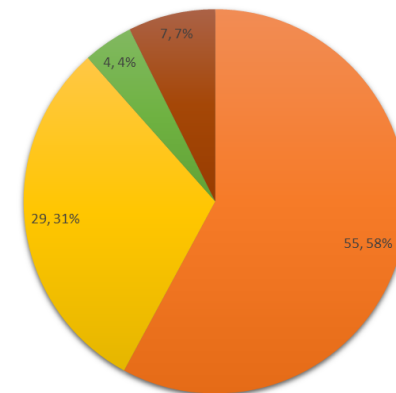
- Owned or being bought by your or someone in your household
- Rented for cash by the respondent
- Occupied by the respondent without payment of cash rent
- Other

Discrimination in housing occurs in many ways. They include, but are not limited to:

- An agent refusing to sell, rent, or show available housing
- A person being shown mostly housing in areas or neighborhoods of minority concentration
- A landlord providing different housing services or enforcing different rules for minority tenants
- A prospective tenatn being told the dwellin is not appropriate for a family
- A person being denied a loan or getting a higher interest rate because of being a member of a certain group
- A person being denied a loan or getting a different interest rate because buying in a minority neighborhood

How informed are you about fair housing?

- Very informed
- Somewhat informed
- Not informed

If you answered yes to the above question, what do you believe was the basis for the discrimination that you experienced?

■ Race	■ Color	■ Religion
■ Sex	■ National Origin	■ Disability/Handicap
■ Familial Status	■ Age	■ Other
■ Familial Status	■ Ethnicity	■ Marital Status
■ Age	■ Limited English Profieciency	■ Citizenship status
■ Level of income	■ Source of income	

Figure 14: Survey respondents on fair housing and discrimination

This page left blank intentionally

ASSESSMENT PAST GOALS AND ACTIONS

North Texas Regional Housing Assessment 2018

This page left blank intentionally

V. Assessment of Past Goals and Actions

1. *Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:*

The following section is based on the Analysis of Impediments (AI) to Fair Housing Choice conducted in 2015 and the 2017 Consolidated Annual Performance and Evaluation Report (CAPER) produced by the City of Dallas.

a. *Discuss what progress has been made toward the achievement of fair housing goals.*

The City of Dallas' 2015 AI identified several impediments to fair housing choice and provided recommendations for specific actions that the City could take to reduce or remove those impediments. The following actions were identified:

- Increase the production and preservation of affordable housing units.
- Increase the number of accessible housing units based on need.
- The City should expand its rehabilitation programs to cover repairs, including accessibility modifications for rental properties.
- The City should ensure that persons with disabilities are aware of the procedure by which they may request reasonable accommodations or modifications on the basis of disability.
- Develop a strategy to address historic patterns of concentration and move toward achieving a balance in housing investments between the northern and southern sectors.
- The City should work with lenders in Dallas and request that they review their underwriting standards to determine that loan decisions are being made equitably.
- Promote education on reasonable accommodation and support services for persons with mental disabilities.
- Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as Asian Americans, persons with disabilities including the hearing impaired, the lesbian, gay, bisexual and transgender (LGBT) community and persons with LEP.
- Increase access to public transportation and transit services for low- and moderate-income persons, persons with disabilities and other protected class members.
- Increase education and outreach to dispel myths and false perceptions about "affordable housing."

Dallas' Comprehensive Annual Performance Evaluation Report (CAPER) includes an assessment of the City's progress towards meeting the goals and objectives established in its 5-year Consolidated Plan and subsequent Annual Action Plans. The CAPERs for the 2009-2011 program years as well as the 2013 Annual Action Plan and the 2013-2017 Consolidated Plan were reviewed to determine recent housing accomplishments and actions taken to promote fair housing.

The City of Dallas' housing priorities are **to increase the supply of affordable housing**, expand **homeownership opportunities**, **revitalize neighborhoods** and **create mixed-income** communities. The CAPERs indicate that the City has consistently provided funding to nonprofit and for-profit developers, sub-recipients and other community-based organizations to operate programs and carry out projects aimed at providing decent housing conditions for low- and moderate-income

residents. According to the 2013-2017 Consolidated Plan, **there is not sufficient affordable housing in Dallas for lower income families**. The City recognizes the need for specific types of housing based on population data and has utilized General Obligation Funds in combination with economic development and transit-oriented initiatives to provide affordable housing.

The City also implemented several housing programs, including the Neighborhood Investment Program (NIP), Community Prosecution Program and the SAFE Program. Each supports code enforcement activities in CDBG-eligible census tracts to correct code violations, reduce criminal activity and create safer and healthy neighborhoods.

Progress made to carry out action plan

Provide Decent Housing. To promote decent, safe, affordable housing, the City administered rehabilitation, homeownership and housing development programs, rental assistance, and housing for homeless persons and families and other special needs populations. Highlights include:

The City used Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds to rehabilitate 219 housing units owned by low- and moderate-income (LMI) households during FY 2016-17. Reconstruction was completed on 20 units, 118 units were repaired through the Major Systems Repair Program, and the People Helping People program provided minor exterior rehabilitation of 81 units for lower-income elderly and/or disabled, single-family homeowners. Through partnership with community housing development corporations and other developers, 59 new housing units were constructed and occupied by lower income buyers. Through the use of general obligation bonds, 200 housing units, single- and multifamily, were constructed.

Homeownership assistance was provided to 120 LMI households through the City's Mortgage Assistance Program (MAP), utilizing both CDBG and HOME funds. Additionally, 43 households received homebuyer outreach, education, counseling, foreclosure counseling and mortgage qualification services through the Housing Services Program.

Emergency Solutions Grant (ESG) funds were used to provide rapid re-housing to 348 homeless persons, shelter and services to 3,055 individuals, and homeless prevention assistance to 147 persons at risk of becoming homeless. Essential services were provided to 610, and 456 received street outreach services – a total of 4,682 unduplicated individuals received an array of services.

Housing Opportunities for Persons with AIDS (HOPWA) funds were used to provide housing assistance and related services to 1,036 households. Of these, 914 received housing assistance, the remainder, 122 received only supportive services through agencies/organizations that also provide housing/housing assistance.

The City administered 419 units of tenant-based rental assistance for homeless individuals and families using HOME, Shelter Plus Care and Supportive Housing Program funds.

Suitable Living Environment. CDBG-funded public service projects served 8,714 persons during the program year. Highlights include:

• Neighborhood Investment Program areas responded to 24,772 code violations and provided improvements to infrastructure. Code enforcement was within all five NIP areas; however, infrastructure improvements were concentrated within only three and neighborhood improvements only within one.

• 3,042 youth received services through two programs, After-School/Summer Outreach and Child Care Services (2,800 and 242, respectively).

• 4,680 seniors received assistance through the Office of Senior Affairs, and an additional 1,267 were provided information through outreach efforts. (The City Office of Senior Services was combined with the Senior Services Program and now operates as the Office of Senior Affairs under the auspices of the City of Dallas Senior Affairs Commission.)

• Training and Employment for Adults with Disabilities assisted 118 individuals.

• 874 defendants who entered the Community Court system received assistance that included short-term intensive case management, job training, housing, employment search services and rehabilitation/treatment services.

Expanded Economic Opportunity. CDBG funds were used to provide business loans, create jobs and provide technical assistance to eligible businesses and people seeking to start their own business. Highlights include:

• Two eligible businesses received a loan, totaling $126,000.

• Loan funds were committed to create and/or retain five positions for businesses receiving loans; six jobs were created – two full time and four part time, or four full-time equivalents (FTEs).

b. *Discuss how successful the participant is in achieving past goals and/or how it has fallen short (including potentially harmful unintended consequences).*

The following tables are extracted from the 2017 CAPER and offer an overview of the specific annual objectives and outcomes achieved by the City. The last column provides comments/insight on the City's relative success in achieving the objectives.

The tables list 50 objectives. While many of these objectives reach a near-completion rate (close to 100%), an estimated 62% (n=31) have not been fully achieved (5-year goal). These include:

- Mortgage Assistance Program **(94%)**
- Major Systems Repair Program (**97%**)
- People Helping People (47%)
- Minor Plumbing Repair/Replacement Program **(62%)**
- Affordability of Decent Housing [low income] **(36%)**
- Affordability of Decent Housing [moderate income] (18%)
- Neighborhood Enhancement Program **(37%)**
- Tenant Based Rental Assistance **(16%)**
- Availability/Accessibility of Sustainable Living Environment **(77%)**
- Tenant Based Rental Assistance [HOPWA] **(94%)**
- Affordability of Decent Housing, Operations [HOPWA] **(61%)**
- Affordability of Decent Housing, Supportive Services [HOPWA] **(88%)**
- After-School/Summer Outreach Program **(68%)**
- Child Care Services Program **(22%)**
- City Child Care Services **(99%)**
- Clinical Health Programs **(13%)**
- Senior Services Program **(55%)**
- Training and Employment for Adults with Disabilities **(80%)**
- South Dallas/Fair Park Community Court **(48%)**
- South Oak Cliff Community Court (54%)
- West Dallas Community Court **(95%)**

- City Crisis Intervention **(38%)**
- Neighborhood Investment Program (NIP) **(27%)**
- Southern Dallas Development Corporation (SDDC) [business loans] **(50%)**
- Southern Dallas Development Corporation (SDDC) [jobs created] **(73%)**
- Business Assistance Centers (BACs) [businesses] **(54%)**
- Code Enforcement – Neighborhood Investment Program (NIP) [units = complexed] **(88%)**
- Code Enforcement – Neighborhood Investment Program (NIP) [events] **(78%)**
- Fair Housing [complaints] **(93%)**
- Fair Housing [events] **(93%)**
- Fair Housing [housing complexes] **(93%)**

UNIVERSITY OF TEXAS ARLINGTON

Table 8: Summary annual objectives City of Dallas (2017 CAPER), items 1-7

CITY OF DALLAS - PROGRAM YEARS 2013-2018 CONSOLIDATED PLAN
TABLE 3A - SUMMARY OF SPECIFIC ANNUAL OBJECTIVES AND OUTCOMES

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Numbers Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
		HOUSING NEEDS - Homeownership Opportunities								
1	HOU	**Mortgage Assistance Program**	CDBG/ HOME/ ADDI	Provide downpayment assistance, closing costs, principle reduction and/or costs for minor repairs for homes to qualify.	Housing Units	2013	120	176	147%	Total for year, DCBG and HOME goals combined = 160. 120 of 160= 75.00%
						2014	120	115	96%	
		DH-1: Availability/Accessibility of Decent Housing				2015	120	153	128%	
						2016	120	120	100%	
						2017	120			
						5-Year Goal	600	564	94%	
		HOUSING NEEDS - Homebuyer/Homeownership Counseling								
2	HOU	**Housing Services Program**	CDBG/ HOME	Provide homebuyer outreach, education, counseling, foreclosure counseling and mortgage qualification.	Housing Units	2013	25	28	112%	The economoy and market has improved for homebuyers and with that the need for these services.
						2014	25	38	152%	
		DH-1: Availability/Accessibility of Decent Housing				2015	25	26	104%	
						2016	25	43	172%	
						2017	25			
						5-Year Goal	125	135	108%	
		HOUSING NEEDS - Homeowner Repairs								
3	HOU	**Reconstruction**	CDBG/ HOME	Provide homeowners assistance for demolition of existing home and reconstruction of a new house on the lot; deferred payment loans.	Households	2013	10	8	80%	These units are generated through the MSRP program. Reprogramming added additional funds which allowed more units to be completed more quickly.
						2014	10	19	190%	
		DH-3: Sustainability of Decent Housing				2015	10	10	100%	
						2016	10	20	200%	
						2017	10			
						5-Year Goal	50	57	114%	
4	HOU	**Major Systems Repair Program**	CDBG	Provide eligible low income and handicapped homeowners with repairs to or replacement of major housing systems.	Households	2013	110	152	138%	Reprogramming added additional funds which also changed the goal to 504 (inclusive of Reconstruction and People Helping People). Overall 219 of 504 = 43.45%
						2014	110	134	122%	
		DH-2: Affordability of Decent Housing				2015	110	132	120%	
						2016	110	118	107%	
						2017	110			
						5-Year Goal	550	536	97%	
5	HOU	**People Helping People**	CDBG	Provide volunteers/contracted services to lower income, elderly, and disabled, single-family homeowners for minor exterior repairs.	Households	2013	350	258	74%	Program was not renwed as of 9.30.17 in order to streamline the Home Repair Program services. Funds were slow to be expended and projects to complete because of a lack of volunteer groups to implement the program.
						2014	350	258	74%	
		DH-3: Sustainability of Decent Housing				2015	350	204	58%	
						2016	350	81	23%	
						2017	350			
						5-Year Goal	1,750	801	46%	
		HOUSING NEEDS - Critical home repair and excessive cost of utilities for elderly homeowners								
6	DWU	**Minor Plumbing Repair/Replacement Program**	CDBG/ General Fund	Provide leak repairs, low flow toilet and fixture replacement and minor plumbing repair assistance to low income, senior citizen homeowners.	People	2013	75	48	64%	Not funded after PY15
						2014	75	93	124%	
		DH-2: Affordability of Decent Housing				2015	75	93	124%	
						2016	75			
						2017	75			
						5-Year Goal	375	234	62%	
		HOUSING NEEDS - Rental Housing								
7	HOU	**Extremely low income**	CDBG/ HOME	Extremely low income	Households	2013	10	20	200%	No new rental units were brought on-line during the program year. The focus was on completing full lease-up at existing developments - filling market rate units was completed. These units are included in the goal for Development Loan Program.
						2014	10	28	280%	
		DH-2: Affordability of Decent Housing				2015	10	21	210%	
						2016	10	0	0%	
						2017	10			
						5-Year Goal	50	69	138%	Goal = 55/year. 18 completed units = 32.73%

Table 9: Summary annual objectives City of Dallas (2017 CAPER), items 8-14

CITY OF DALLAS - PROGRAM YEARS 2013-2018 CONSOLIDATED PLAN
TABLE 3A - SUMMARY OF SPECIFIC ANNUAL OBJECTIVES AND OUTCOMES

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Numbers Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
8	HOU	DH-2: Affordability of Decent Housing	CDBG/ HOME	Low income	Households	2013	10	10	100%	No new rental units were brought on-line during the program year. The focus was on completing full lease-up at existing developments - filling market rate units was completed. These units are included in the goal for Development Loan Program.
						2014	10	7	70%	
						2015	10	1	10%	
						2016	10	0	0%	
						2017	10			
						5-Year Goal	50	18	36%	Goal = 55/year. 18 completed units = 32.73%
9	HOU	DH-2: Affordability of Decent Housing	CDBG/ HOME	Moderate income	Households	2013	10	5	50%	No new rental units were brought on-line during the program year. The focus was on completing full lease-up at existing developments - filling market rate units was completed. These units are included in the goal for Development Loan Program.
						2014	10	2	20%	
						2015	10	2	20%	
						2016	10	0	0%	
						2017	10			
						5-Year Goal	50	9	18%	Goal = 55/year. 18 completed units = 32.73%
HOUSING NEEDS - Affordable Housing										
10	HOU	Development Program / DH-2: Affordability of Decent Housing	CDBG/ HOME	Provide developers with loans/grants for acquisition of vacant and improved properties, predevelopment and development costs, operating assistance and development, etc.	Housing Units	2013	10	50	500%	Annual Goal inclusive of rental units. Goal = 55/year. 18 completed units = 32.73%
						2014	10	12	120%	
						2015	10	11	110%	
						2016	10	18	180%	
						2017	10			
						5-Year Goal	50	91	182%	
11	HOU	CHDO Development Loans / DH-2: Affordability of Decent Housing	HOME	Provide developers with loans/grants for acquisition of vacant and improved properties, predevelopment and development costs, operating assistance and development, etc.	Housing Units	2013	10	33	330%	Annual goal adjusted based on funding - 23 units/year. 41 units = 178.27% Availability of gap financing for developers allowed for more units to be completed more quickly. Uptick in employment rates and continued economic growth resulted in additional mortgage-ready buyers.
						2014	10	22	220%	
						2015	10	26	260%	
						2016	10	41	410%	
						2017	10			
						5-Year Goal	50	122	244%	
HOUSING NEEDS - Other Housing/Neighborhood Revitalization and Code Enforcement										
12	HOU	Neighborhood Enhancement Program / SL-3: Sustainability of Suitable Living Environment	CDBG	Provide toolbox of neighborhood improvements to increase aesthetic appeal and complement community development efforts in neighborhood investment and other strategically targeted areas.	People	2013	47,179	7,857	17%	Not funded after PY15 Accomplishments are for projects started in PY15 and/or utilized funding not spent in previous PY. Public improvements were concentrated in just 1 of the 5 targeted NIP areas. Within that area, improvements were not implemented in the entire area. This was the final improvement for the target area. This program is completed.
						2014	47,179	62,715	133%	
						2015	47,179	12,670	27%	
						2016	47,179	3,075	7%	
						2017	47,179			
						5-Year Goal	235,895	86,317	37%	
13	DPD DFD CCS	Dedicated SAFE II Expansion Code Inspection - Police/Fire/Code / SL-3: Sustainability of Suitable Living Environment	CDBG / N/A	Provide strict code and fire enforcement services to substandard properties in high crime areas to bring properties into code compliance.	People	2013	94,592	66,418	70%	Not funded after PY15
						2014	94,592	388,635	411%	
						2015	94,592	229,550	243%	
						2016	94,592			
						2017	94,592			
						5-Year Goal	472,960	684,603	145%	
HOMELESS SERVICES										
14	HOU	Tenant Based Rental Assistance / DH-2: Affordability of Decent Housing	HOME	Provide transitional rental assistance to homeless families and individuals for up to one year, up to 24 months.	Households	2013	190	0	0%	Not funded after PY15 Households served were enrolled in prior program year
						2014	190	62	33%	
						2015	190	69	36%	
						2016	190	25	13%	
						2017	190			
						5-Year Goal	950	156	16%	

Table 10: Summary annual objectives City of Dallas (2017 CAPER), items 15-22

CITY OF DALLAS - PROGRAM YEARS 2013-2018 CONSOLIDATED PLAN
TABLE 3A - SUMMARY OF SPECIFIC ANNUAL OBJECTIVES AND OUTCOMES

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Numbers Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
15	HOU	Shelter Plus Care DH-2: Affordability of Decent Housing	Shelter Plus Care	Provide long-term tenant based and project based rental assistance and supportive services to homeless families and individuals.	Households	2013	229	333	145%	
						2014	229	310	135%	
						2015	229	306	134%	
						2016	229	230	100%	
						2017	229			
						5-Year Goal	1,145	1,179	103%	
16	HOU	Supportive Housing Program DH-2: Affordability of Decent Housing	Supportive Housing Program N/A	Provide long-term and transitional tenant based and project based rental assistance and supportive services to homeless families and individuals.	Households	2013	107	127	119%	Additional households were served from savings on rent subsidies where clients with income pay a portion of their rent.
						2014	107	128	120%	
						2015	107	144	135%	
						2016	107	164	153%	
						2017	107			
						5-Year Goal	535	563	105%	
17	HOU	Essential Services SL-1: Availability/Accessibility of Sustainable Living Environment	ESG	Provide direct services to homeless persons to address employment, substance abuse treatment and health prevention services.	People	2013	486	428	88%	Goal adjusted based on funding, perceived need. New goal = 645/year. 908 of 645 = 140.78% Greater demand for essential services in shelter than projected.
						2014	486	491	101%	
						2015	486	899	185%	
						2016	486	908	187%	
						2017	486			
						5-Year Goal	2,430	2,726	112%	
18	HOU	Operations SL-1: Availability/Accessibility of Sustainable Living Environment	ESG/ General Fund	Provide operational costs for shelters or transitional housing facilities for homeless persons.	People	2013	6,315	7,759	123%	Goal adjusted based on funding, perceived need. New goal = 4,315/year. 4,682 of 4,315 = 108.51% Greater use of shelter services than originally projected.
						2014	6,315	9,263	147%	
						2015	6,315	2,504	40%	
						2016	6,315	4,682	74%	
						2017	6,315			
						5-Year Goal	31,575	24,208	77%	
19	HOU	Prevention DH-2: Affordability of Decent Housing	ESG	Provide short-term (3 months) and long-term (4 to 24 months) rental assistance ; moving costs, utility assistance, deposits, and last month's rent to person's who are at risk of homelessness and are 30% of the area	People	2013	102	213	209%	Goal adjusted based on funding, perceived need. New goal = 70/year. 147 of 70 = 210.00% Greater demand for homeless prevention services than projected.
						2014	102	132	129%	
						2015	102	196	192%	
						2016	102	147	144%	
						2017	102			
						5-Year Goal	510	688	135%	
20	HOU	Rapid Rehousing DH-2: Affordability of Decent Housing	ESG	Provide short-term (3 months) and long-term (4 to 24 months) rental assistance ; moving costs, and last month's rent to person's who are homeless and are at 30% of the area median income	People	2013	119	507	426%	Goal adjusted based on funding, perceived need. New goal = 162/year. 348 of 162 = 214.81% Greater demand for Rapid Re-housing services than projected.
						2014	119	218	183%	
						2015	119	280	235%	
						2016	119	348	292%	
						2017	119			
						5-Year Goal	595	1,353	227%	
OTHER HOUSING - Persons living with HIV/AIDS and Their Families										
21	HOU	Tenant Based Rental Assistance DH-2: Affordability of Decent Housing	HOPWA	Provide long-term and transitional rental assistance to persons with HIV/AIDS and their families living in the metropolitan area.	Households	2013	190	182	96%	Goal adjusted based on funding. New goal = 270/year. 277 of 270 = 102.59% Additional households were served due to increase in funding. Focus was on reducing the TBRA waiting list.
						2014	190	213	112%	
						2015	190	217	114%	
						2016	190	277	146%	
						2017	190			
						5-Year Goal	950	889	94%	
22	HOU	Prevention DH-2: Affordability of Decent Housing	HOPWA	Provide short-term rent, mortgage and utility assistance to persons with HIV/AIDS and their families living in the metropolitan area.	Households	2013	250	405	162%	Goal adjusted based on funding (goal in this table is a typo and should be 350). New goal 380/year. 359 of 380 = 94.47% Greater demand for STRMU homeless prevention assistance remains high.
						2014	250	423	169%	
						2015	250	382	153%	
						2016	250	359	144%	
						2017	250			
						5-Year Goal	1,250	1,569	126%	

Table 11: Summary annual objectives City of Dallas (2017 CAPER), items 23-30

CITY OF DALLAS - PROGRAM YEARS 2013-2018 CONSOLIDATED PLAN
TABLE 3A - SUMMARY OF SPECIFIC ANNUAL OBJECTIVES AND OUTCOMES

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
23	HOU	**Operations** DH-2: Affordability of Decent Housing	HOPWA	Provide operational costs, including lease, maintenance, utilities, insurance and furnishings for facilities that provide housing to persons with HIV/AIDS and their families living in the metropolitan area.	Households	2013	315	243	77%	Goal adjusted based on funding (goal in this table is a typo and should be 350). New goal = 230/year. 267 of 230 = 116.08%. There was less turnover in project-based units than originally expected.
						2014	315	209	66%	
						2015	315	247	78%	
						2016	315	267	85%	
						2017	315			
						5-Year Goal	**1,575**	**966**	**61%**	
24	HOU	**Supportive Services** DH-2: Affordability of Decent Housing	HOPWA	Provide housing services, information, outreach and support to enhance the quality of life for persons living with HIV/AIDS and their families living in the metropolitan area, including hospice/respite care for affected	Households	2013	925	1,025	111%	
						2014	925	1,066	115%	
						2015	925	950	103%	
						2016	925	1,036	112%	
						2017	925			
						5-Year Goal	**4,625**	**4,077**	**88%**	
25	HOU	**Housing Information Services** DH-2: Affordability of Decent Housing	HOPWA	Provide housing informtion services and resurce identification for persons living with HIV/AIDS and their families living in the metropolitan area, including hospice/respite care for affected children	Housing Units	2013	175	268	153%	Demand for housing information services for those seeking to find affordabable housing is high. This is more of an issue now that there is a short supply of affordable housing units and long waiting lists for Section 8 and TBRA programs.
						2014	175	278	159%	
						2015	175	225	129%	
						2016	175	232	133%	
						2017	175			
						5-Year Goal	**875**	**1,003**	**115%**	

PUBLIC SERVICE NEEDS - Youth Programs

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
26	PKR	**After-School/Summer Outreach Program** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Provide after-school and summer outreach programs for youth (ages 6-12) Monday-Friday through structured recreational, cultural, social and life skill activities.	Youth	2013	3,300	2,845	86%	Goal adjusted based on funding. New goal = 2,800. 2,800 of 2,900 = 96.55%
						2014	3,300	2,868	87%	
						2015	3,300	2,682	81%	
						2016	3,300	2,800	85%	
						2017	3,300			
						5-Year Goal	**16,500**	**11,195**	**68%**	
27	HOU	**Child Care Services Program** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG/ General Fund	Provide after-school programs and daycare for special needs children, homeless children and children with disabilities.	Youth	2013	330	140	42%	Not funded after PY15. Combined with the City Child Care Services.
						2014	330	53	16%	
						2015	330	168	51%	
						2016	330			
						2017	330			
						5-Year Goal	**1,650**	**361**	**22%**	
28	HOU	**City Child Care Services** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG/ Texas Workforce Commission	Provide child care subsidies for low/mod income working parents and teenage parents who are attending school and do not qualify for any other form of public assistance.	Youth	2013	120	69	58%	Goal changed based on reduced funding and combining City Child Care Services with Child Care Services. New goal = 175/year. 242 of 175 = 138.29% Increased efficiency in service delivery costs account for increase in number served.
						2014	120	104	87%	
						2015	120	180	150%	
						2016	120	242	202%	
						2017	120			
						5-Year Goal	**600**	**595**	**99%**	

PUBLIC SERVICE NEEDS - Clinical Health Programs

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
29	HOU	**Clinical Dental Care Program** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG/ General Fund	Provide dental health services to low income seniors.	Seniors	2013	200	184	92%	Not funded after PY15
						2014	200	0	0%	
						2015	200	0	0%	
						2016	200			
						2017	200			
30	HOU	**Clinical Dental Care Program** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG/ General Fund	Provide dental health services to low income children and youth through age 19.	Youth	2013	200	73	37%	Not funded after PY15
						2014	200	0	0%	
						2015	200	0	0%	
						2016	200			
						2017	200			
						5-Year Goal	**2,000**	**257**	**13%**	

Table 12: Summary annual objectives City of Dallas (2017 CAPER), items 31-37

CITY OF DALLAS - PROGRAM YEARS 2013-2018 CONSOLIDATED PLAN
TABLE 3A - SUMMARY OF SPECIFIC ANNUAL OBJECTIVES AND OUTCOMES

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
							Numbers			
PUBLIC SERVICE NEEDS - Senior Programs										
31	HOU	**City Office of Senior Affairs** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Enhance the quality of life for older adults by disseminating support services information and providing direct and emergency support services.	Seniors	2013	4,800	4,845	101%	Numbers reflect the combination of the City Office of Senior Affairs and the Senior Services Program (Contract Ombusdsman Project). The combination of pograms and reduction in funding reduced overall goal to 2,000; outreach resulted in a greater number of seniors receiving information, services, referral to services. Ombudsman program continues as part of the Office of Senior Affairs program.
						2014	4,900	9,299	190%	
						2015	5,000	7,781	156%	
						2016	5,100	4,680	92%	
						2017	5,200			
						5-Year Goal	**25,000**	**26,605**	**106%**	
32	HOU	**Senior Services Program** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Provide case management and other programs for seniors, as well as investigative support services in both community and institutional settings.	Seniors	2013	2,680	1,599	60%	Not after PY15. Rolled into the City Office of Senior Affairs as the Ombudsman Program.
						2014	2,680	1,876	70%	
						2015	2,680	3,933	147%	
						2016	2,680			
						2017	2,680			
						5-Year Goal	**13,400**	**7,408**	**55%**	
PUBLIC SERVICE NEEDS - Other Public Service Activities (Non-Youth)										
33	HOU	**Training and Employment for Adults with Disabilities** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Provides development of life skills, vocational training and job placement for adults with disabilities.	People	2013	130	141	108%	Cost per client to provide training services increased thus not able to meet the goal.
						2014	130	128	98%	
						2015	130	131	101%	
						2016	130	118	91%	
						2017	130			
						5-Year Goal	**650**	**518**	**80%**	
34	ATT	**South Dallas/Fair Park Community Court** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Provide an opportunity to enforce municipal laws for offenses and code violations of properties.	People	2013	107,440	107,440	100%	New goal = 1,375/year > 14.62% Overall 874 of 4,125 = 21.19% Original goal was LMA; changed to LMC. Goal based on number of unduplicated defendants who participated in the program - not all defendants opt to work with the program.
						2014	107,440	150,980	141%	
						2015	107,440	550	1%	
						2016	107,440	201	0%	
						2017	107,440			
						5-Year Goal	**537,200**	**259,171**	**48%**	
35	ATT	**South Oak Cliff Community Court** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Provide an opportunity to enforce municipal laws for offenses and code violations of properties.	People	2013	73,906	73,906	100%	New goal = 1,375/year > 20.8% Overall 874 of 4,125 = 21.19% Original goal was LMA; changed to LMC. Goal based on number of unduplicated defendants who participated in the program - not all defendants opt to work with the program.
						2014	73,906	126,465	171%	
						2015	73,906	726	1%	
						2016	73,906	286	0%	
						2017	73,906			
						5-Year Goal	**369,530**	**201,383**	**54%**	
36	ATT	**West Dallas Community Court** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Provide an opportunity to enforce municipal laws for offenses and code violations of properties.	People	2013	59,639	59,639	100%	New goal = 1375/year > 28.15% Overall 874 of 4,125 = 21.19% Original goal was LMA; changed to LMC. Goal based on number of unduplicated defendants who participated in the program - not all defendants opt to work with the program.
						2014	59,639	221,755	372%	
						2015	59,639	1,087	2%	
						2016	59,639	387	1%	
						2017	59,639			
						5-Year Goal	**298,195**	**282,868**	**95%**	
37	DPD	**City Crisis Intervention** SL-1: Availability/Accessibility of Sustainable Living Environment	CDBG	Provide case management to seniors experiencing mental health crisis, and link to services. Provide assertive street outreach, conduct assessments, and link unsheltered homeless persons to treatment services.	People	2013	54	103	191%	Not funded after PY13
						2014	54			
						2015	54			
						2016	54			
						2017	54			
						5-Year Goal	**270**	**103**	**38%**	

Table 13: Summary annual objectives City of Dallas (2017 CAPER), items 38-44

CITY OF DALLAS - PROGRAM YEARS 2013-2018 CONSOLIDATED PLAN
TABLE 3A - SUMMARY OF SPECIFIC ANNUAL OBJECTIVES AND OUTCOMES

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
		INFRASTRUCTURE - Infrastructure Improvements								
38	HOU	**Neighborhood Investment Program (NIP)**	CDBG	Provide public improvement projects to address concerns for public health and safety and provide focus for new developments to stabilize neighborhoods and build communities.	People	2013	47,179	14,945	32%	Not funded after PY15. Accomplishments reflect projects started in prev PY and use of remaining funding. Projects concentrated in 3 of 5 NIP areas and where other improvements were already underway/complete. This Program is in the close-out phase; will be replaced with Neighborhood Plus.
						2014	47,179	12,975	28%	
		SL-3: Sustainability of Suitable Living Environment				2015	47,179	17,885	38%	
						2016	47,179	18,053	38%	
						2017	47,179			
						5-Year Goal	235,895	63,858	27%	
		ECONOMIC DEVELOPMENT - Financial Assistance to Small Businesses								
39	ECO	**Southern Dallas Development Corporation (SDDC)**	CDBG	Business loans (for profit).	Businesses	2013	5	5	100%	Limited funding availability - program relies on program income received from loan repayment and no additional entitlement funds - limits the number of loans that can be made.
						2014	5	3	60%	
		EO-2: Affordability of Economic Opportunity				2015	4	1	25%	
						2016	4	2	50%	
						2017	4			
						5-Year Goal	22	11	50%	
40	ECO	**Southern Dallas Development Corporation (SDDC)**	CDBG	Jobs created.	Jobs	2013	17	24	141%	Goal changed based on funding. New goal = 8/year. 4 of 8 = 50.00% Limited funding availability - program relies on program income received from loan repayment and no additional entitlement funds - limits the number of loans that can be made and jobs created.
						2014	17	25	147%	
		EO-2: Affordability of Economic Opportunity				2015	17	9	53%	
						2016	17	4	24%	
						2017	17			
						5-Year Goal	85	62	73%	
		ECONOMIC DEVELOPMENT - Technical Assistance to LMI Persons Own/Developing Micro-Enterprise Businesses								
41	ECO	**Business Assistance Centers (BACs)**	CDBG	Provide comprehensive and group technical assistance sessions and support services to micro enterprise incubator tenants, existing business and prospective new micro-enterprises (8 BACs)	Businesses	2013	640	732	114%	Not funded after PY15.
						2014	640	540	84%	
		EO-2: Affordability of Economic Opportunity				2015	640	458	72%	
						2016	640			
						2017	640			
						5-Year Goal	3,200	1,730	54%	
42	ECO	**Business Assistance Centers (BACs)**	CDBG	Total number attending BAC TA sessions or accessing support services. Number may include those potential entrepreneurs attending multiple TA sessions (8 BACs).	People	2013	720	1,185	165%	Not funded after PY15.
						2014	720	1,984	276%	
		EO-2: Affordability of Economic Opportunity				2015	720	1,185	165%	
						2016	720			
						2017	720			
						5-Year Goal	3,600	4,354	121%	
		OTHER NEEDS - Code Enforcement (Revitalize and Preserve Neighborhoods by Enhancing Code Enforcement Activities)								
43	CCS	**Code Enforcement - Neighborhood Investment Program (NIP)**	CDBG	Provide enhanced code enforcement activities in the targeted NIP areas.	Inspections	2013	18,911	23,073	122%	Goal in ConPlan is based on LMA = 46,335 of 50,000 = 79.95%
						2014	19,478	30,738	158%	
		SL-3: Sustainability of Suitable Living Environment				2015	20,063	32,645	163%	
						2016	20,665	24,772	120%	
						2017	21,284			
						5-Year Goal	100,401	111,228	111%	
44	CCS	**Code Enforcement - Neighborhood Investment Program (NIP)**	CDBG/ General Fund	Monitor and expand the Multifamily Inspection Program.	Units= Complexes	2013	1,045	1,630	156%	Goal in Con Plan is based on LMA = 46,335 of 50,000
						2014	1,045	1,329	127%	
		SL-3: Sustainability of Suitable Living Environment				2015	1,045	764	73%	
						2016	1,045	891	85%	
						2017	1,045			
						5-Year Goal	5,225	4,614	88%	

Table 14: Summary annual objectives City of Dallas (2017 CAPER), items 45-50

CITY OF DALLAS - PROGRAM YEARS 2013-2018 CONSOLIDATED PLAN
TABLE 3A - SUMMARY OF SPECIFIC ANNUAL OBJECTIVES AND OUTCOMES

	Dept	Project Name/Specific Objective	Funds Source	Outcome	Accomplishment Type	Program Year	Numbers Proposed	Actual	Percent Complete	Program Year 2016-17 Comments
		OTHER NEEDS - Code Enforcement (Revitalize and Preserve Neighborhoods by Enhancing Code Enforcement Activities)								
45	CCS	**Code Enforcement - Neighborhood Investment Program (NIP)** SL-3: Sustainability of Suitable Living Environment	General Fund	Aggressively pursue the Graffiti Removal Program (abatement).	Buildings	2013	1,206	1,237	103%	The department experienced another significant decline in graffiti violations citywide. LMA = 46,335 of 50,000 = 79.95%
						2014	1,327	4,611	347%	
						2015	1,459	1,124	77%	
						2016	1,605	432	27%	
						2017	1,766			
						5-Year Goal	7,363	7,404	101%	
46	CCS	**Code Enforcement - Neighborhood Investment Program (NIP)** SL-3: Sustainability of Suitable Living Environment	CDBG	Develop and implement a code enforcement public awareness campaign.	Events	2013	13	15	115%	Goal in Con Plan is based on LMA = 46,335 of 50,000 = 79.95%
						2014	15	15	100%	
						2015	17	18	106%	
						2016	19	18	95%	
						2017	21			
						5-Year Goal	85	66	78%	
		FAIR HOUSING								
47	OFS	**Fair Housing** N/A	CDBG	Housing assistance inquiries processed and/or referred annually.	People	2013	1,200	1,864	155%	Number of inquiries has grown as citizen's and other agencies have become more aware of the services offered by the Dallas Fair Housing Office. Awareness is due to outreach efforts by the FHO.
						2014	1,200	2,708	226%	
						2015	1,200	3,561	297%	
						2016	1,200	5,093	424%	
						2017	1,200			
						5-Year Goal	6,000	13,226	220%	
48	OFS	**Fair Housing** N/A	CDBG	Investigate discrimination complaints of violations of the Fair Housing Ordinance.	Complaints	2013	70	82	117%	Number of inquiries has grown as citizen's and other agencies have become more aware of the services offered by the Dallas Fair Housing Office. Awareness is due to outreach efforts by the FHO.
						2014	70	93	133%	
						2015	70	78	111%	
						2016	70	74	106%	
						2017	70			
						5-Year Goal	350	327	93%	
49	OFS	**Fair Housing** N/A	CDBG	Provide fair housing education and outreach.	Events	2013	70	79	113%	Number of inquiries has grown as citizen's and other agencies have become more aware of the services offered by the Dallas Fair Housing Office. Awareness is due to outreach efforts by the FHO.
						2014	70	50	71%	
						2015	70	64	91%	
						2016	70	82	117%	
						2017	70			
						5-Year Goal	350	275	79%	
50	OFS	**Fair Housing** N/A	CDBG	Approve and monitor Affirmative Fair Housing Marketing Plans (AFHMO) for city assisted housing programs and projects.	Housing Complexes	2013	38	43	113%	Number of inquiries has grown as citizen's and other agencies have become more aware of the services offered by the Dallas Fair Housing Office. Awareness is due to outreach efforts by the FHO.
						2014	38	23	61%	
						2015	38	29	76%	
						2016	38	44	116%	
						2017	38			
						5-Year Goal	190	139	73%	

c. *Discuss any additional policies, actions or steps that the program participant could take to achieve past goals or mitigate problems it has experienced.*

The City of Dallas is working in a more collaborative way across departmental lines to ensure that fair housing goals are achieved. City leadership has formed cross functional teams that have representation from multiple departments to achieve goals and remove silos that hinder progress. Decisions are being made utilizing objective data with all affected departments having access to the same data. This approach will result in a more productive use of resources and better fair housing outcomes for the community.

d. *Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.*

The AFH goals proposed in this report are a natural outgrowth of past Dallas goals. Goals continue to emphasize the need to increase the production and preservation of affordable housing and the imperative to address geographic imbalances, notably between the northern and southern sectors of the City.

New goals seek to unequivocally combat patterns of segregation and concentrated poverty through strategic and spatially targeted actions. New AFH goals are designed to foster new and strengthen existing coalitions for coordinated actions across sectors and entities (i.e. housing authorities, transportation authorities and nonprofits).

The AFH goals are designed with the intent to respond to growing market pressures (i.e. gentrification, rapidly rising taxes and lack of affordability) and systemic challenges including source of income discrimination. Currents goals are also intended to leverage ongoing city-led efforts to address growing inequities and the recent adoption of the housing policy and development of analytical tools (Market Value Analysis and upcoming Neighborhood Change Index).

In addition, the current goals are designed to not only enhance fair housing in Dallas, but to remove obstacles to the DHA furthering fair housing.

FAIR HOUSING ANALYSIS

This page left blank intentionally

V. Fair Housing Analysis

A. Demographic Summary

Overall trends 1990-2013

From 1990 to 2013, the racial and ethnic composition of Dallas changed considerably. The white population declined from close to 48% to only 29% of the City's overall population. This change mirrors the regional trend, where the proportion of white residents declined from 70% in 1990 to 51% in 2013.

While the share of white residents declined both at the jurisdictional and regional levels, contrasting trends can be observed for the Hispanic population. In Dallas from 1990 to 2013, the Hispanic population proportion doubled from 21% to 42%. Hispanics at the regional level experienced a similar increase with a shift from 13% to 27%.

As for the black population, Dallas and the region experienced diverging trends. In Dallas, the share of black residents declined from 29% to 25% between 1990 and 2013. Regionally, the share of black residents slightly increased from 14% (1990) to 15% (2013). However, the black and Hispanic share of Dallas' population remains significantly greater than the regional share, which likely affects these groups' residential sorting and patterns of segregation at the jurisdictional and regional levels.

The Asian or Pacific Islander (Asian/PI) share of the population slightly increased from 2% to 3% between 1990 and 2013, while regionally it increased from 2% to 5%. Except for minor changes in the intervening decades, the share of Native American residents in Dallas and the region remained about the same at 0.3% and 0.4%, respectively.
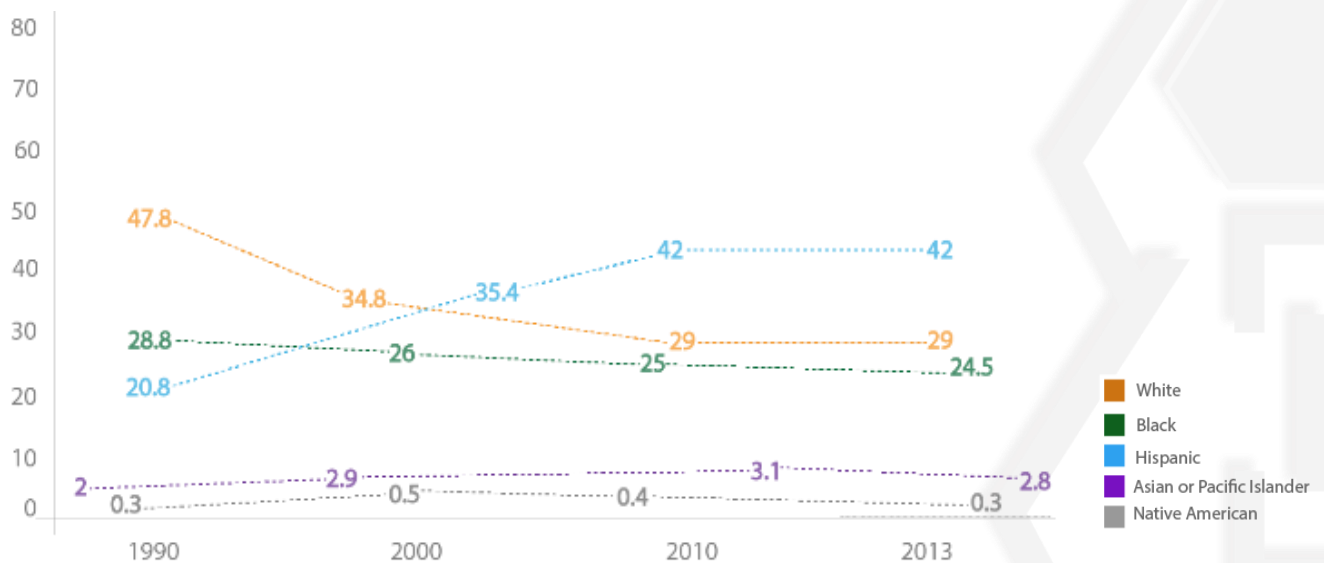
Figure 15: Percent of population by race and ethnicity, City of Dallas
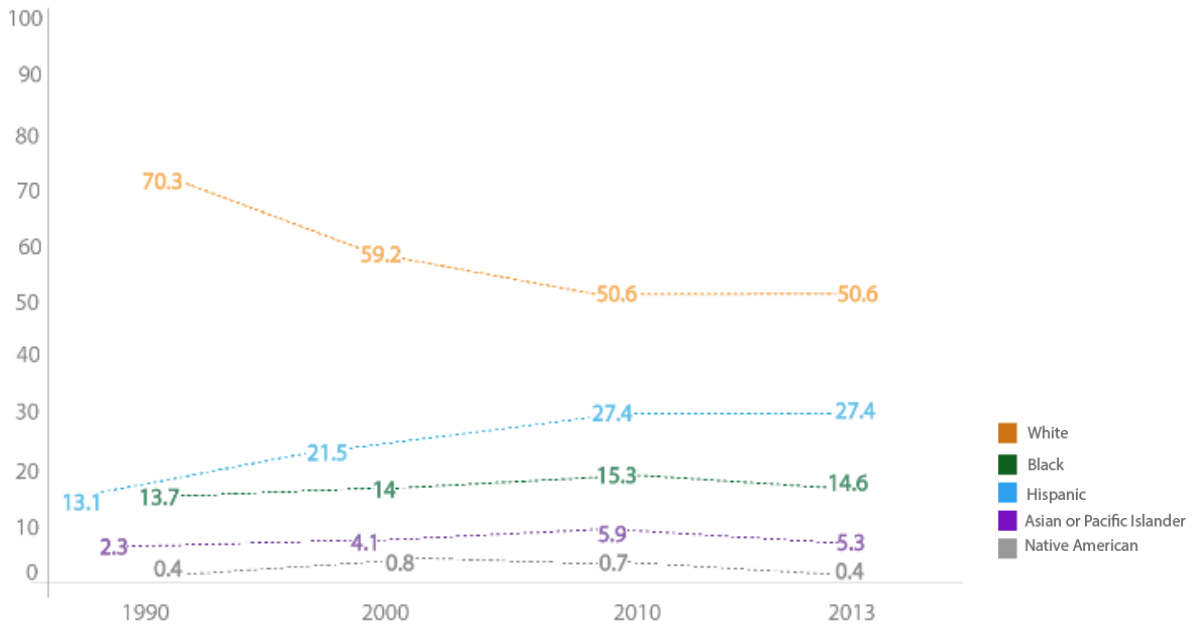
Figure 16: Percent of population by race and ethnicity, Dallas Fort Worth Region

Spatial patterns 1990-2015

Finer insight can be gained by mapping these trends. The following maps illustrate the population's racial or ethnic concentration at the census tract level (roughly equivalent to a neighborhood) for 1990, 2000, 2010 and 2015. The data is drawn from the U.S. Decennial Census and the American Community Survey and is expressed as percentages. As the racial or ethnic concentration increases, the shaded area in the map darkens.

In 1990, white residents predominantly lived in the northern and eastern parts of the City. By 2010, the concentration had significantly shifted to north Dallas, a pattern that persisted in 2015. In 1990, the black population primarily lived in the southern sectors, west Dallas and Pleasant Grove, which also had a low concentration of white residents (Figure 17). With the exception of far northeast Dallas, from 1990 to 2015 black residents remained mainly concentrated in the southern sectors. Throughout 1990-2015, areas of black residential concentration typically correlated with a low white residential concentration.

The growth of the Hispanic population can be seen as replacing white residents in both west and east Dallas. Similar to the black population, the areas with high Hispanic concentrations show a low concentration of white residents. In 1990, the highest concentration of Hispanics occurred in western Dallas with the proportion of Hispanic households in these census tracts ranging from 60% to 90%. In 2010, areas of high Hispanic concentration expanded into west, northwest and east Dallas. In 2015, the concentration of Hispanic residents in northwest and northeast Dallas decreased.

In 1990 and 2000, some concentration of Asian/PI households occurred in far northwest Dallas. In 2010, the census tracts with the largest concentrations (45% to 53%) of Asian/PI shifted to the Love Field and North Lake areas. Neighborhoods with lower concentrations appeared in north Dallas. In 2015, small pockets of relatively high concentration persisted in northeast and far north Dallas.
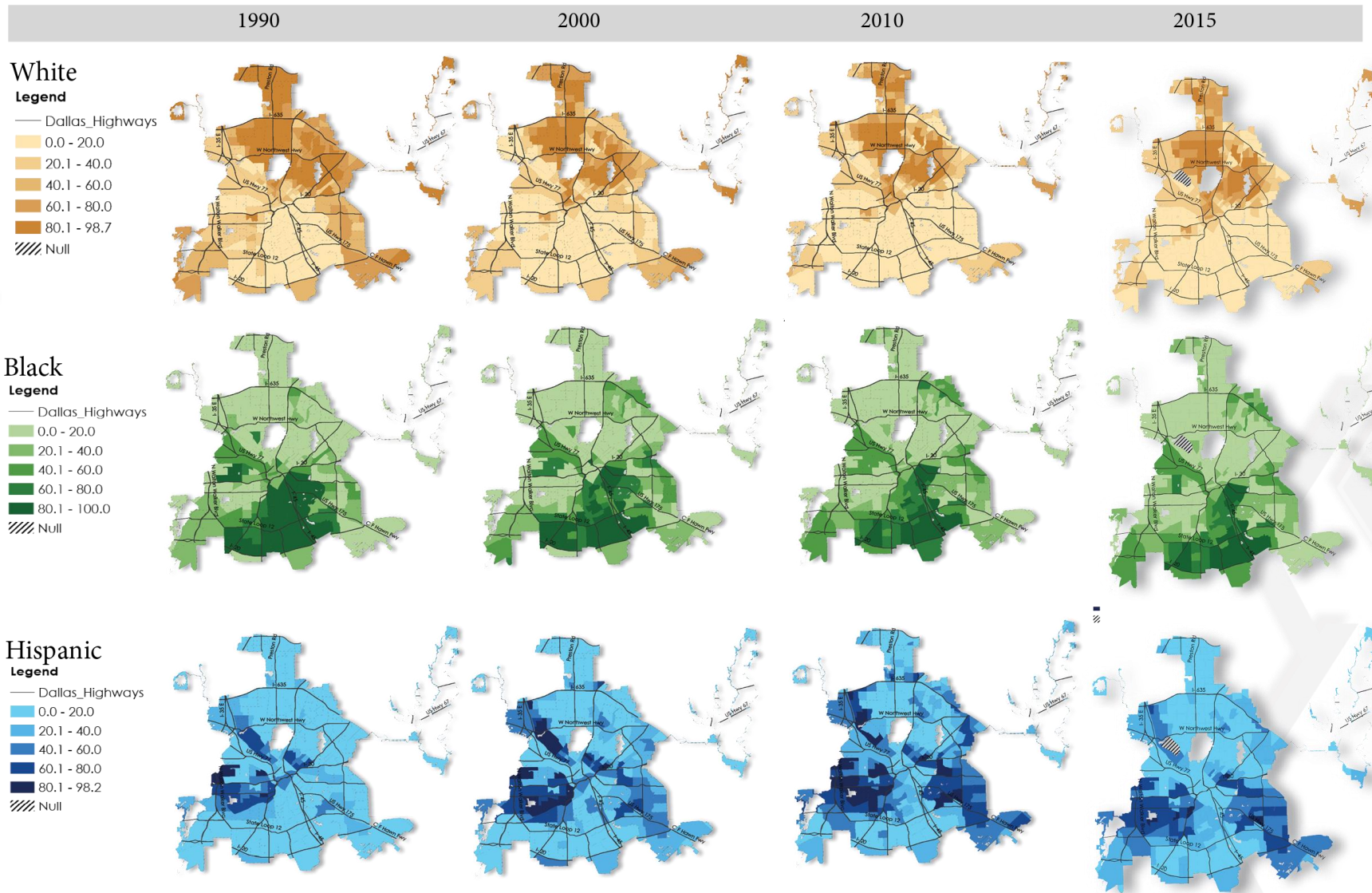
Figure 17: Percent of population by race and ethnicity, City of Dallas

| 1990 | 2000 | 2010 | 2015 |

Asian or Pacific Islander

Legend
— Dallas_Highways
▫ 0.0 - 15.0
▫ 15.1 - 30.0
▫ 30.1 - 45.0
▫ 45.1 - 56.4
▨ Null
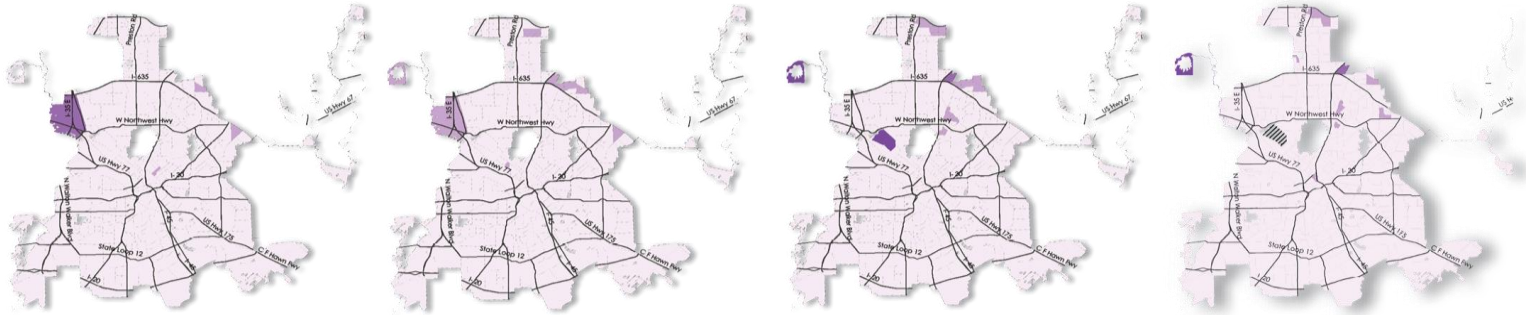
Native American

Legend
— Dallas_Highways
▫ 0.00 - 1.00
▫ 1.01 - 2.00
▫ 2.01 - 3.10
▨ Null
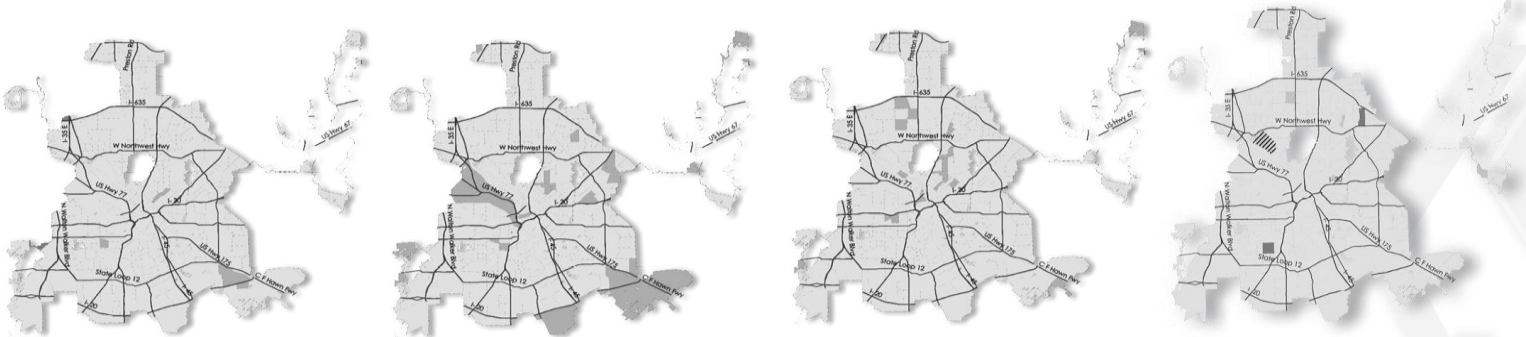
Figure 18: Percent of population by race and ethnicity, City of Dallas

B. General Issues

i. Segregation / Integration

1. Analysis

a. *Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*

To gauge the levels of segregation in Dallas and the region, HUD provides a dissimilarity index, which is a conventional measure that assesses the degree of residential segregation between two groups. The higher the dissimilarity index value, the greater the level of segregation. The index value ranges from 0 to 100 where 0 to 39 indicate segregation, 40 to 54 moderate segregation and values from 55 to 100 a high level of segregation.
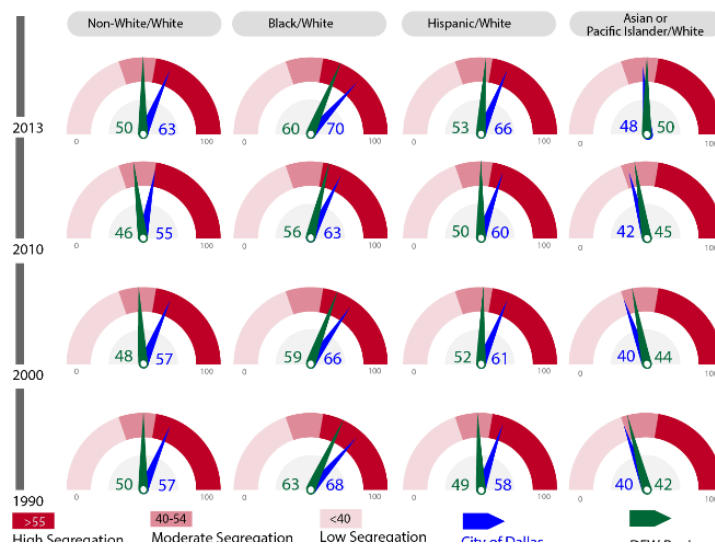
Figure 19: Dissimilarity index, City of Dallas and DFW region

Comparing only 1990 to 2013, the dissimilarity index values indicate an increase in segregation levels for all comparison groups in the City. More specifically, in 2013, all comparison groups aside from Asian/PI register a high level of segregation in Dallas. The level of segregation between Asian/PI and white residents continued to be moderate, although this comparison group registered an overall increase from 1990 to 2013 (+8 points).

In 2013, a dissimilarity index value of 63 pointed to a high level of segregation in Dallas between nonwhite and white residents. With a value of 70 for the same year, the black/white comparison group recorded the highest level of segregation and the 'Hispanic/white' comparison group generated a value of 66.

As a whole, the level of segregation in Dallas appears considerably higher than the region, with the exception of the Asian/PI comparison group. Although the black/white comparison group demonstrated the highest level of segregation in Dallas-Fort Worth, it also registered an overall decline from 1990 to 2013 (as opposed to the increasing jurisdictional trend). On the other hand, the regional level of segregation between Hispanic and white residents remained moderate, although it registered an overall increase from 1990 to 2013. Distinctively, the level of segregation

between Asian/PI and white residents remained lower in Dallas than in the region where it consistently increased during the same period.

b. *Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin or LEP group and indicate the predominant group living in each area.*

To supplement the HUD-provided dissimilarity index and assess spatial patterns of segregation, additional maps identify potential disparities in racial composition (and other group characteristics) between the City and its neighborhoods (census tracts) and assess to what extent the racial composition of a given neighborhood differs from the overall jurisdictional racial composition. The data used for the following maps comes from the HUD-provided raw dataset; for the full methodology, refer to Appendix A.

NONWHITE/WHITE SEGREGATION

As discussed in the previous section, Dallas registers high levels of nonwhite/white segregation. Figure 20 illustrates this spatial divide and the significantly greater concentration of the nonwhite population in the southern sector of Dallas and a considerable cluster of white residents in north Dallas. The concentration of the nonwhite population is significantly greater and more acute in the Fair Park area, south Dallas, east and southeast Oak Cliff, and west Dallas south of the Trinity River. The dominant groups living in these segregated areas are black (southern areas) and Hispanic (eastern and western areas) (Figure 20).

Dallas has very few areas of relative *integration*[2] that is, where the racial composition of the neighborhood appears comparable to the city's overall composition. More specifically and as of 2010, integrated areas occur along: (1) SH 190 in north Dallas, (2) southwest of the Dallas Athletic Club, (3) south of Old East Dallas,(4) the Bishop Arts area, (5) and finally far southwest Dallas along State Spur 408.
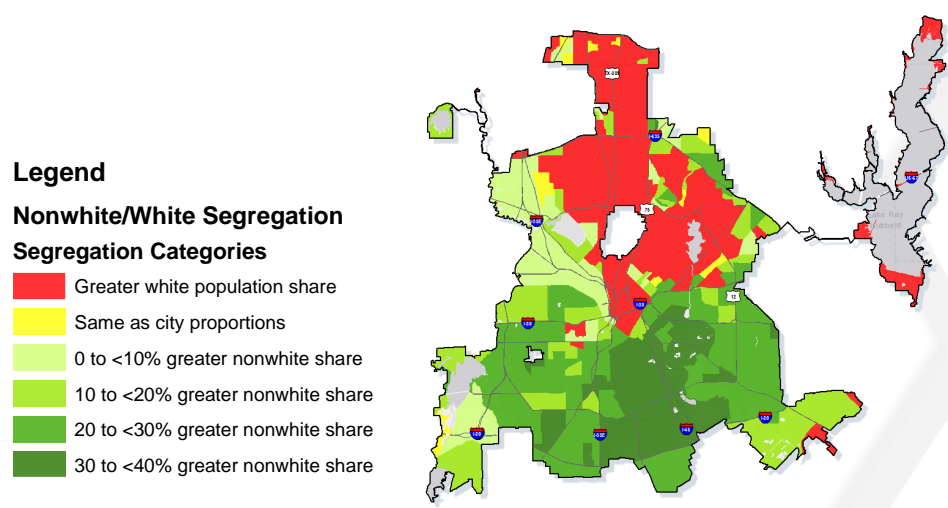
Figure 20: Nonwhite/white segregation, Dallas 2015

---

[2] Relative to the overall jurisdictional racial and ethnic composition. It is critical to keep in mind that the maps in this section are built around the HUD-provided dissimilarity index and capture the extent to which a given neighborhood differs from the overall racial and ethnic composition of the City. The City of Dallas registers high nonwhite/white segregation. Therefore, a neighborhood designated as integrated (yellow areas), is only as integrated as the City.

REGIONAL PATTERNS OF NONWHITE/WHITE SEGREGATION

A regional perspective best captures patterns of segregation. While the dissimilarity index for the region indicates an overall moderate level of nonwhite/white segregation in 2010, a spatial analysis reveals a stark contrast for Dallas.

In the Dallas-Fort Worth region, nonwhite residents disproportionately concentrate in the inner suburbs, Fort Worth and Dallas. As indicated by the darkest shade of green, nearly all neighborhoods in the southern sector of Dallas, the Pleasant Grove area and in west Dallas experience a share of nonwhite residents at least 40% greater than the regional proportion. Smaller clusters occur around the Love Field area.

From a regional perspective, the north/south spatial divide in Dallas appears even more acute and further highlights the extent to which nonwhite residents in the region disproportionately live in the west and southern sectors of Dallas (south of I-30).
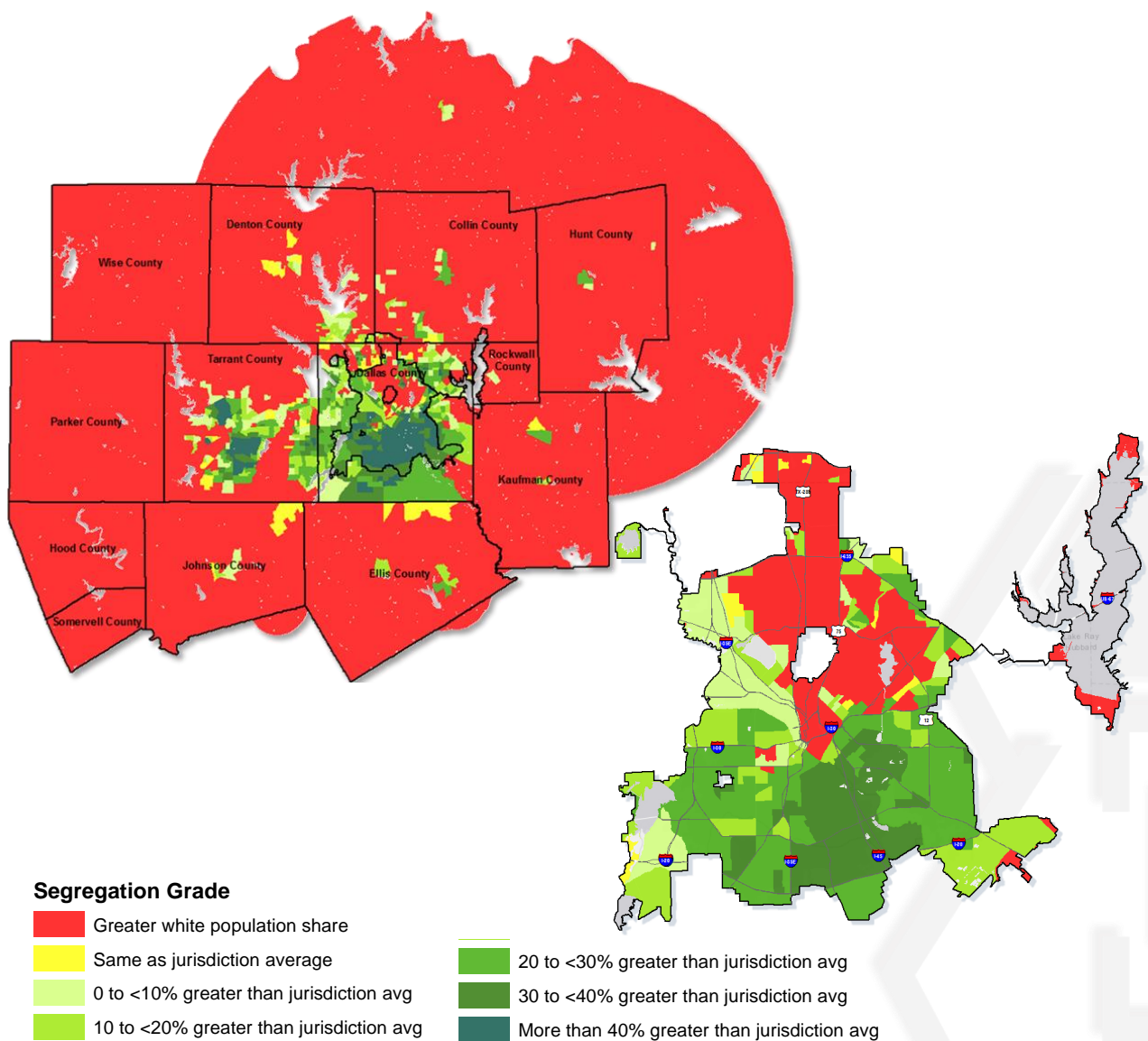
Figure 21: Nonwhite/white segregation, Dallas and North Texas region, 2015

BLACK/NON-BLACK SEGREGATION

Figure 22 further illustrates the spatial segregation for Dallas and reveals a large cluster of census tracts in south Dallas with a concentration of black residents at least 40% larger than the proportion of blacks for the whole jurisdiction. The highest levels of black segregation also occur in the Fair Park area and east Oak Cliff. Other pockets with significant concentrations occur in west Dallas (south of Harry Hines Boulevard), northeast Dallas near I-635 and east Dallas along I-30 near Mesquite. A few integrated areas, highlighted in yellow, display a proportion of black residents similar to the one found in the overall jurisdiction.
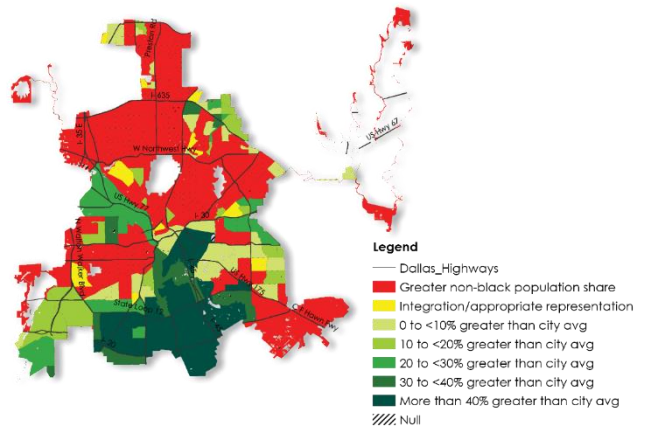
Figure 22: Black/non-black segregation, Dallas 2010

HISPANIC/NON-HISPANIC SEGREGATION

Similar segregation patterns occur in Figure 23 for the Hispanic population where clusters of census tracts with a concentration of Hispanics at least 40% greater than the jurisdictional proportion also exist. These clusters primarily occur in west Dallas, northwest Dallas near I-35E, east Dallas. Some isolated pockets of concentration occur in north Dallas near I-635.
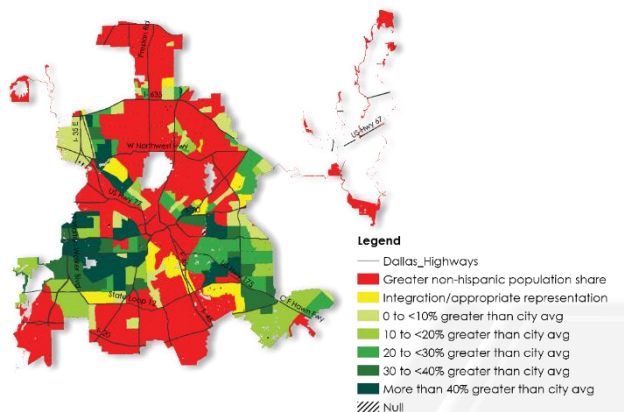
Figure 23: Hispanic/non-Hispanic segregation, Dallas 2010

ASIAN OR PACIFIC ISLANDER/NON-ASIAN OR PACIFIC ISLANDER SEGREGATION

As for the Asian/PI population, although the dissimilarity index values indicate a moderate level of segregation for the City, their concentration reaches at least 40% greater than the jurisdictional proportion around North Lake and Dallas Love Field. Lower concentrations occur throughout north Dallas.
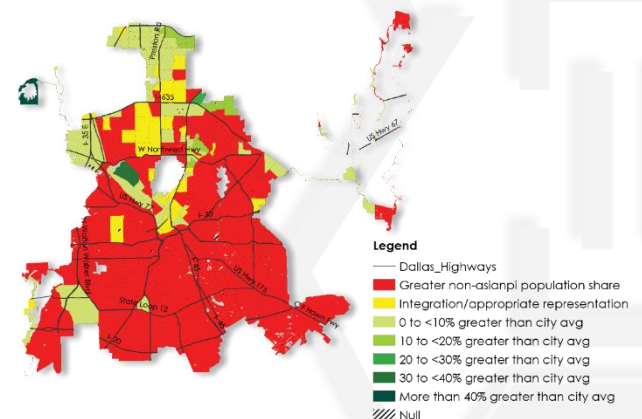
Figure 24: Asian or PI/Non-Asian or PI segregation, Dallas 2010

NATIONAL ORIGIN

From 1990 to 2013, the share of foreign-born residents in Dallas more than doubled, from 12% to 25% (Figure 25) he most represented country of origin is Mexico, which accounted for 205,124 individuals in 2013. The figure below reveals clusters of segregated neighborhoods with a share of foreign-born residents 30%-40% higher than the jurisdictional share.

Based on 2010 data, a few clusters emerge across the City where the share of foreign-born residents represents at least 30% more than the expected jurisdictional proportion. These clusters appear in (1) northwest Dallas (north of Bachman Lake) and northeast Dallas near SH Loop 12.
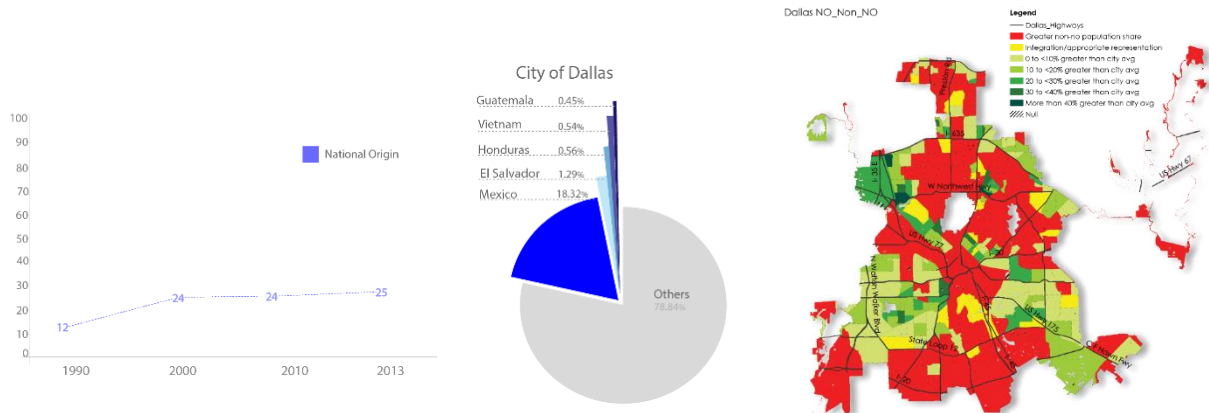
Figure 25: National origins: trends, top countries (2013) and segregation (2010)

LIMITED ENGLISH PROFICIENCY (LEP)

From 1990 to 2013, the proportion of LEP residents in Dallas more than doubled, increasing from 10% to 21%. Spanish (20%) represents the predominant language for LEP residents while the next most common, Vietnamese (0.4%) and Chinese (0.3%), fall far behind. The map below shows that the census tracts with a greater share of non-Spanish LEP individuals are predominantly located in the northern section of the City, with the exception of downtown and the far southwestern (Mountain Creek) and Red Bird/Southeast Oak Cliff sectors. The map further shows a few areas whose share of Spanish LEP individuals is 10%-20% greater than the jurisdictional average. These areas tend to correspond to the same areas with clusters of highly concentrated foreign-born residents from Mexico.
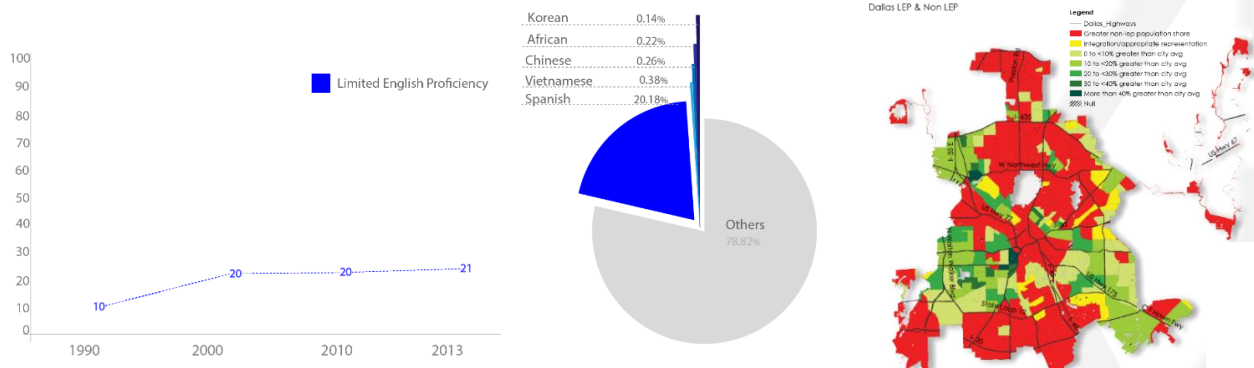
Figure 26: LEP: trends, top languages (2013) and segregation (2010)

PREDOMINANT GROUPS LIVING IN INTEGRATED AND SEGREGATED AREAS

The study uses the nonwhite/white segregation maps as the basis for identifying integrated and segregated areas and the predominant groups living in those areas. This approach builds a socio-demographic profile of the neighborhoods contained within each segregation category, as presented in the table below.

The neighborhood composition considers race, ethnicity, limited English proficiency, national origin, family with children and three levels of household income – (1) less or equal to 30% of area median income (AMI), (2) greater than 30% but less or equal to 50% of AMI, and (3) more than 50% but less or equal to 80% of AMI.

2010

2015

Segregation Grade

- 🟥 Greater white population share
- 🟨 Same as jurisdiction average
- 🟩 0 to <10% greater than jurisdiction avg
- 🟩 10 to <20% greater than jurisdiction avg
- 🟩 20 to <30% greater than jurisdiction avg
- 🟩 30 to <40% greater than jurisdiction avg
- 🟩 More than 40% greater than jurisdiction avg
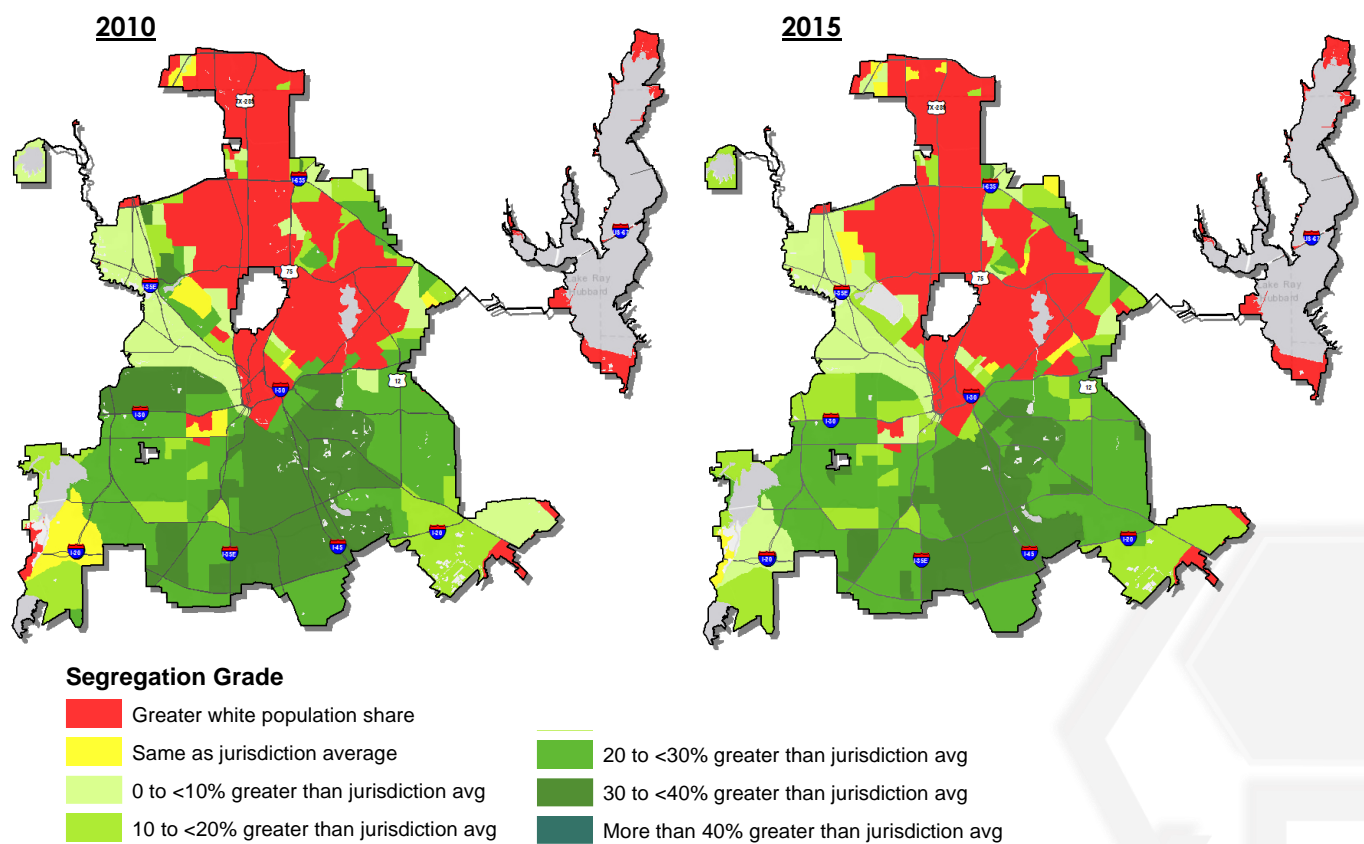
Figure 27: Spatial patterns of segregation nonwhite/white Dallas, 2010 and 2015

Category 6: Nonwhite share 30% to <40% greater than jurisdiction

From 2010 to 2015, the most segregated neighborhoods of Dallas, those concentrating nonwhite residents at a proportion 30%-40% greater than the jurisdiction, decreased slightly and primarily retreated to southern Dallas. In this five-year period, the share of black households increased by 6 percentage points, while the share of Hispanic households decreased. On the other hand, the share of white household remained at only 2%. In 2015, close to 40% of households had extremely low income (30% AMI). In these highly segregated census tracts, almost 80% of the population experiences poverty (at levels below 80% AMI). From 2010 to 2015, the proportion of foreign-born in these census tracts decreases from 24% to 17% while LEP increases from 24% to 32%.
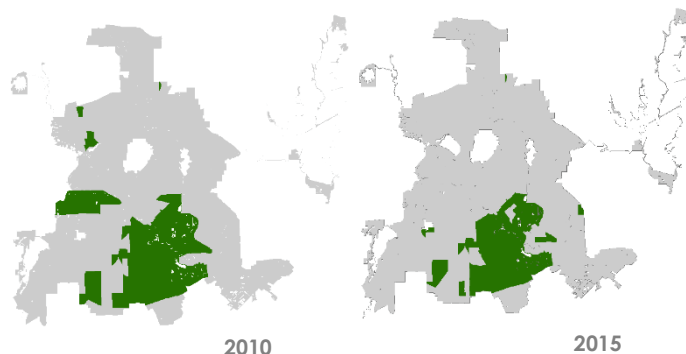
2010   2015

Figure 28: Patterns, Segregation Category 6 (2010 and 2015)

Table 15: Neighborhood composition, Segregation Category 6 (2010 and 2015)

YEAR	White	Black	Hispanic	Asian/PI	30% AMI	50% AMI	80% AMI	LEP	Top LEP	POB	TOP POB
2010	2%	53%	45%	0.3%				24%	Spanish (24%)	24%	Mexico (20%)
2015	2%	59%	38%	0.1%	37%	21%	21%	32%	Spanish (31%)	17%	Mexico (15%)

Category 5: Nonwhite share 20% to <30% greater than jurisdiction

The second most segregated category of neighborhoods, those whose share of nonwhites exceeds the jurisdictional average by 20%-30%, expanded in west and east Dallas from 2010 to 2015. These predominantly Hispanic census tracts represent most of Oak Cliff and east Dallas. Although the share of Hispanics declined by 2 percentage points from 2010 to 2015, the overall share of the LEP population substantially increased (estimated to be 52% in 2015). The predominant LEP language spoken is Spanish and the country of origin for foreign-born residents is Mexico. Almost 70% of the population in these census tracts experiences poverty (at levels below 80% AMI).

2010   2015
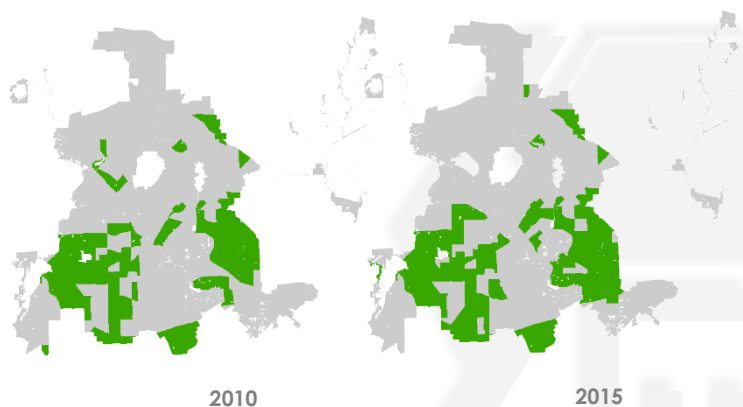
Figure 29: Patterns, Segregation Category 5 (2010 and 2015)

Table 16: Neighborhood composition, Segregation Category 5 (2010 and 2015)

YEAR	White	Black	*Hispanic*	Asian/PI	30% AMI	50% AMI	80% AMI	LEP	Top LEP	POB	TOP POB
2010	8%	28%	62%	1%				29%	Spanish (28%)	31%	Mexico (26%)
2015	8%	30%	60%	1%	26%	21%	24%	52%	Spanish (49%)	28%	Mexico (23%)

Category 4: Nonwhite share 20% to <10% greater than jurisdiction

The spatial distribution of census tracts whose share of nonwhites exceeds the jurisdictional average by 20%-10% remains relatively dispersed from 2010 to 2015. In 2015, a few more of these census tracts emerge on the western side of the City, as well as north of Pleasant Grove and around Love Field. These census tracts remain predominantly Hispanic (51%). Similar to the previous category (5), a substantial share of the residents in these tracts have LEP. Almost 60% of the population in these census tracts experiences poverty (at levels below 80% AMI).

2010   2015
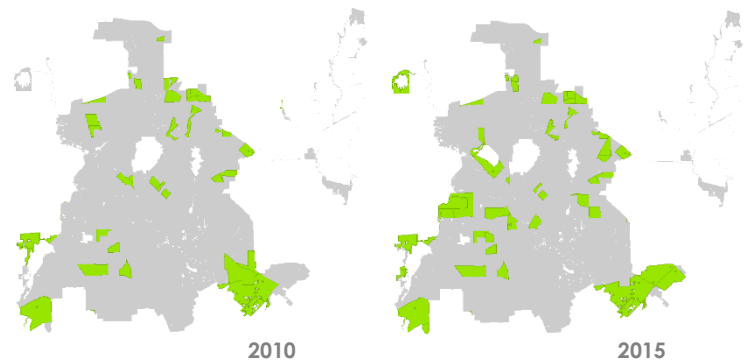
Figure 30: Patterns, Segregation Category 4 (2010 and 2015)

Table 17: Neighborhood composition, Segregation Category 4 (2010 and 2015)

YEAR	White	Black	Hispanic	Asian/PI	30% AMI	50% AMI	80% AMI	LEP	Top LEP	POB	TOP POB
2010	18%	25%	51%	5%				25%	Spanish (23%)	32%	Mexico (21%)
2015	19%	24%	51%	5%	21%	19%	23%	49%	Spanish (42%)	31%	Mexico (19%)

Category 3: Nonwhite share 10% to <0% greater than jurisdiction

The spatial patterns for census tracts whose share of nonwhites exceeds the jurisdictional average by at least 10% remains relatively constant from 2010 to 2015 and primarily occur near Mountain Creek Lake.
While these areas remain majority nonwhite, their share of white households increases by almost 10%, and only about 55% of the households live in poverty.
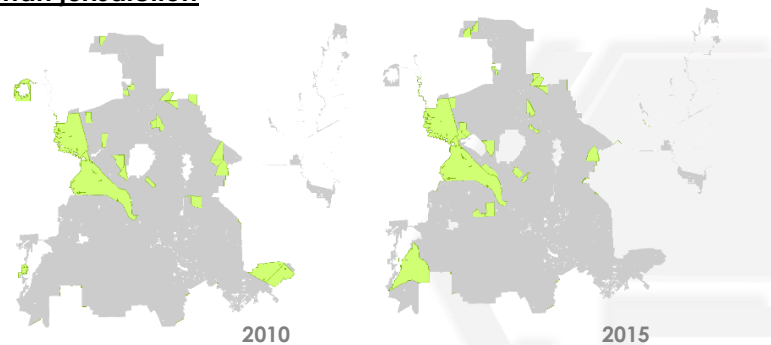
2010   2015

Figure 31: Patterns, Segregation Category 3 (2010 and 2015)

Table 18: Neighborhood composition, Segregation Category 3 (2010 and 2015)

YEAR	White	Black	Hispanic	Asian/PI	30% AMI	50% AMI	80% AMI	LEP	Top LEP	POB	TOP POB
2010	29%	22%	41%	8%				19%	Spanish (17%)	31%	Mexico (15%)
2015	28%	21%	42%	7%	17%	18%	21%	47%	Spanish (38%)	31%	Mexico (18%)

Category 2: Nonwhite share similar greater than jurisdiction

Census tracts whose share of the nonwhite population matches the jurisdiction occur sporadically throughout the City other than south Dallas. The LEP proportion remains high for these census tracts, but the white proportion also exceeds 33%. Poverty does not appear as problematic for these census tracts.
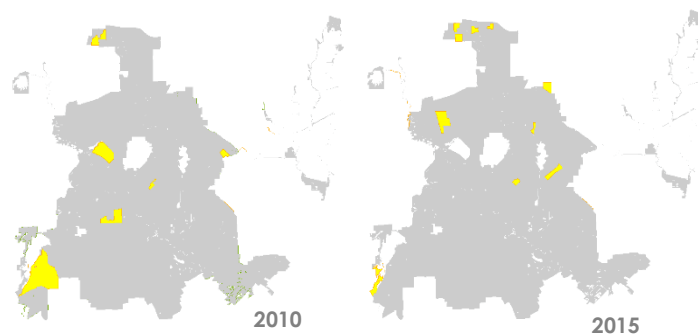
Figure 32: Segregation patterns category 2 (2010 and 2015)

Table 19: Neighborhood composition, Segregation Category 2 (2010 and 2015)

YEAR	White	Black	Hispanic	Asian/PI	30% AMI	50% AMI	80% AMI	LEP	Top LEP	POB	TOP POB
2010	35%	24%	34%	8%				19%	Spanish (17%)	31%	Mexico (15%)
2015	34%	22%	28%	11%	14%	11%	17%	36%	Spanish (24%)	26%	Mexico (10%)

Category 1: White share greater than jurisdiction

The spatial pattern of disproportionately white census tracts (with respect to the City's overall share of whites) remains virtually identical from 2010 to 2015.

Note the persistent north/south divide between these more affluent northern tracts and the substantially less affluent tracts in the southern sector of Dallas.

In contrast to the census tracts in Category 6, a significantly lower share of low-income households can be found in Category 1 census tracts, which typically include a greater share of the white population.
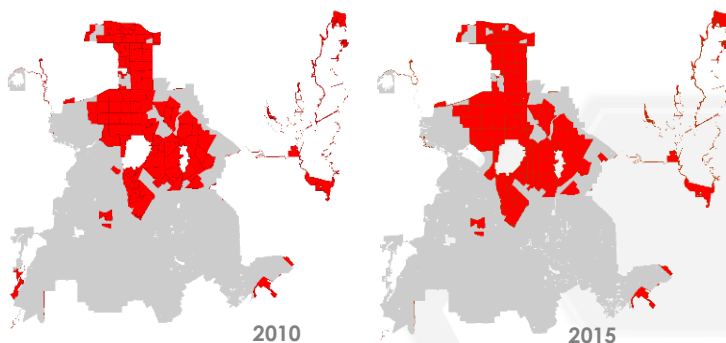
Figure 33: Patterns, Segregation Category 1 (2010 and 2015)

Table 20: Neighborhood composition, Segregation Category 1 (2010 and 2015)

YEAR	White	Black	Hispanic	Asian/PI	30%AMI	50%AMI	80%AMI	LEP	Top LEP	POB	TOP POB
2010	64%	11%	18%	6%				7%	Spanish (5%)	13%	Mexico (5%)
2015	63%	10%	19%	5%	9%	9%	14%	22%	Spanish (15%)	15%	Mexico (6%)

c. ***Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).***

From 1990 to 2013, the level of nonwhite/white segregation in Dallas remained high; as measured by the dissimilarity index, it increased six points. Regionally, segregation remained moderate during this period (dissimilarity index value of 50 for both 1990 and 2013).

The level of black/white segregation increased in Dallas from 1990 to 2013 by two points from 68 to 70. However, the black/white dissimilarity index values were consistently higher than any other racial or ethnic group comparison in any year. On the other hand, while remaining high, the black/white segregation level declined somewhat in the region.

Similar to black/white segregation and despite declining slightly in 2010, the level of Hispanic/white segregation remained high from 1990 to 2013. Regionally, the changes in segregation levels for this group comparison show an overall increase from 1990 to 2013, although the segregation levels remained moderate.

Levels of Asian or Pacific Islander/white segregation continue to remain lower in Dallas than in the Dallas-Fort Worth region. Both regionally and jurisdictionally, the levels increased from 1990 to 2013 while remaining moderate.
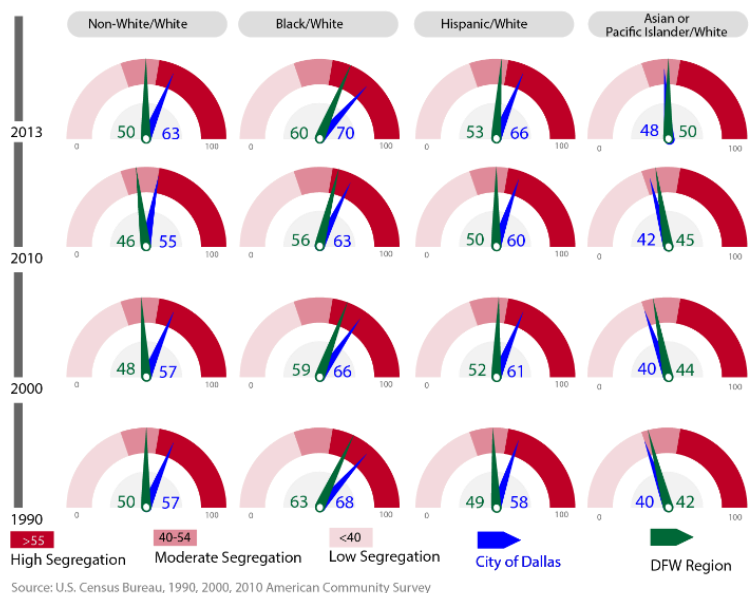
Figure 34: Dissimilarity index, Dallas and region

SPATIAL PATTERNS OF SEGREGATION

Persistently high racial and ethnic segregation in Dallas is obvious. To better understand this landscape of segregation, additional maps were created to identify the disparities in racial and ethnic composition across neighborhoods (census tracts) and across years (1990, 2000, 2010 and 2015).

A first clear feature of segregation in Dallas is the north/south divide as noted by the green areas in figure 35 where a significantly larger share of nonwhite population resides. Overall, from 1990 to 2015, the majority of the neighborhoods in the southern sector of Dallas continue to account for a nonwhite population share 20%-30% greater than the City's share. Across the

years, significantly more acute levels of segregation continue to affect the Fair Park area, south Dallas, east Oak Cliff, north Oak Cliff, and central and southeast Oak Cliff.

A second striking feature revealed by these patterns of segregation is the shrinking number of relatively integrated areas[3], where the racial and ethnic composition of a given neighborhood is similar to the one of the City. The very few integrated areas found in 2010 in the southern sectors disappeared by 2015, which along with the previously mentioned segregation measures indicates a growing racial/ethnic polarization in Dallas' neighborhoods.

Segregation Grade

- Greater white population share
- Same as jurisdiction average
- 0 to <10% greater than jurisdiction avg
- 10 to <20% greater than jurisdiction avg
- 20 to <30% greater than jurisdiction avg
- 30 to <40% greater than jurisdiction avg
- More than 40% greater than jurisdiction avg
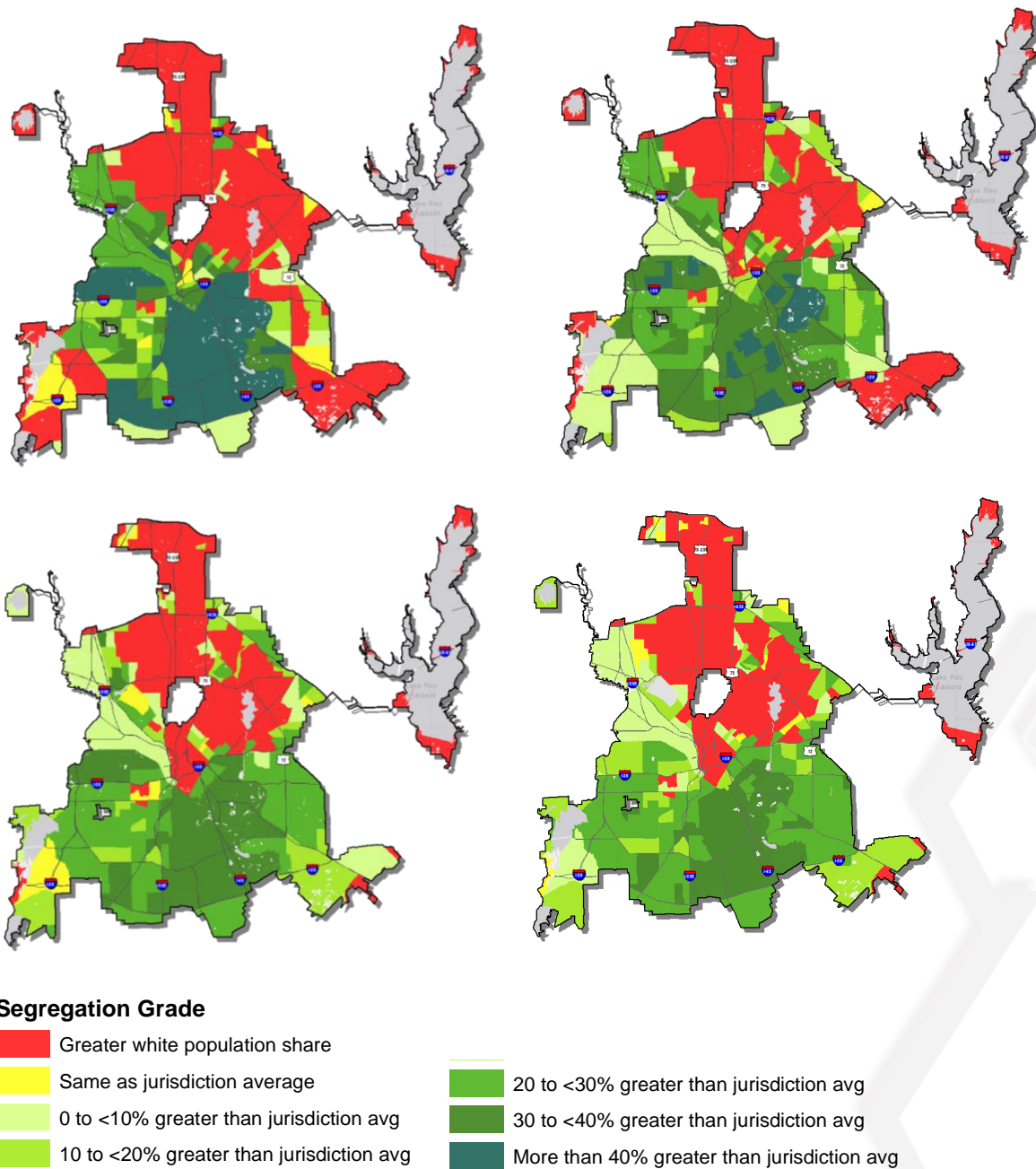
Figure 35: Segregation patterns nonwhite/white, Dallas (1990-2015)

---

[3] Relative to the overall jurisdictional racial and ethnic composition. See Dissimilarity Index

d. **Consider and describe the location of owner- and renter-occupied housing in the jurisdiction and region in determining whether such housing is located in segregated of integrated area and describe trends over time.**

The following tables describe the demographics of census tracts in Dallas with increasing levels of nonwhite/white segregation. As segregation becomes more pronounced, the proportion of renters per census tract tends to increase in 2010. In 2013, locations with population shares similar to the overall City and with low levels of segregation appear to have a greater proportion of renters, which may indicate gentrifying locations. Ownership appears much more segregated at the regional level.

Table 21 shows that regionally, homeownership predominates among white census tracts with 72% homeownership and among integrated census tracts with over 50% homeownership. In 2013, all other categories had between 45% and 53% homeownership. Homeownership was significantly higher in census tracts where the percent of white residents exceeded the average for the region.

While some fluctuation in overall ownership occurred between 2010 and 2013 in the different segregation categories, most changes appear less than 4%. The largest variation occurs in Category 4 where the ownership percentage dropped 5.6 points. Furthermore, Category 4 also represented the only segregated category to experience a drop in homeownership between 2010 and 2013; all other segregated categories experienced increasing homeownership rates.

Table 21: Housing tenure (2010 and 2013) and segregation, Dallas and North Texas region

Segregation/Integration degree: Dallas (2010)		Total Owner	Total Renters
Nonwhite share 30% to <40% greater than jurisdiction		41.8%	58.2%
Nonwhite share 20% to <30% greater than jurisdiction		46.7%	53.3%
Nonwhite share 10% to <20% greater than jurisdiction		37.8%	62.2%
Nonwhite share 0% to <10% greater than jurisdiction		45.9%	54.1%
Nonwhite share similar to jurisdiction's share		41.0%	59.0%
Greater White population share than jurisdiction		55.4%	44.6%

Segregation/Integration degree: Dallas (2013)		Total Owner	Total Renters
Nonwhite share 30% to 40% greater than jurisdiction		48.5%	51.5%
Nonwhite share 20% to 30% greater than jurisdiction		48.1%	51.9%
Nonwhite share 10% to 20% greater than jurisdiction		41.6%	58.4%
Nonwhite share 0% to 10% greater than jurisdiction		31.4%	68.6%
Nonwhite share similar to jurisdiction's share		34.9%	65.1%
Greater white population share than jurisdiction		53.5%	46.5%

Segregation/Integration degree: Region (2010)		Total Owner	Total Renters
Nonwhite share more than 40% greater than jurisdiction		47.4%	52.7%
Nonwhite share 30% to <40% greater than jurisdiction		42.6%	57.4%
Nonwhite share 20% to <30% greater than jurisdiction		49.3%	50.7%
Nonwhite share 10% to <20% greater than jurisdiction		53.1%	46.9%
Nonwhite share 0% to <10% greater than jurisdiction		49.0%	51.0%
Nonwhite share similar to jurisdiction's share		57.0%	43.0%
Greater white population share than jurisdiction		71.9%	28.1%

Segregation/Integration degree: Region (2013)		Total Owner	Total Renters
Nonwhite share more than 40% greater than jurisdiction		50.5%	49.5%
Nonwhite share 30% to 40% greater than jurisdiction		45.7%	54.3%
Nonwhite share 20% to 30% greater than jurisdiction		48.6%	51.4%
Nonwhite share 10% to 20% greater than jurisdiction		47.5%	52.5%
Nonwhite share 0% to 10% greater than jurisdiction		53.0%	47.0%
Nonwhite share similar to jurisdiction's share		55.5%	44.5%
Greater white population share than jurisdiction		72.2%	27.8%
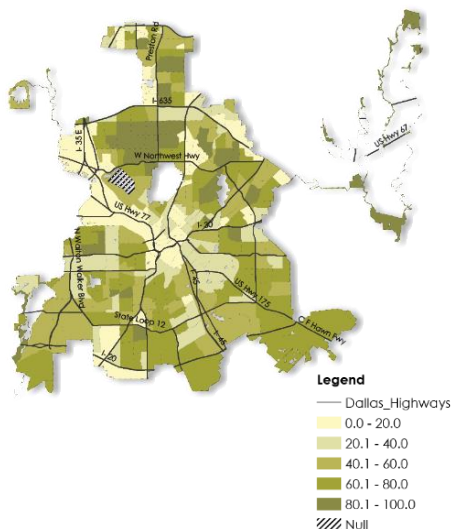
Figure 37: Homeownership patterns, Dallas (2013)
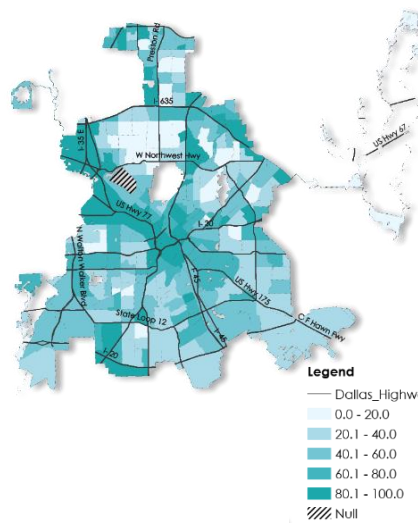
Figure 36: Renters patterns, Dallas (2013)

Figure 37 shows that many census tracts in north Dallas show very high ownership rates while the I-35E corridor north of downtown has very low ownership rates. The R/ECAPs located in north Dallas coincide with high rental percentages (Figure 37) however, many of the segregated census tracts in east, west and south Dallas have moderate to high ownership rates. These locations with moderate to high ownership rates include some R/ECAPs in south Dallas.
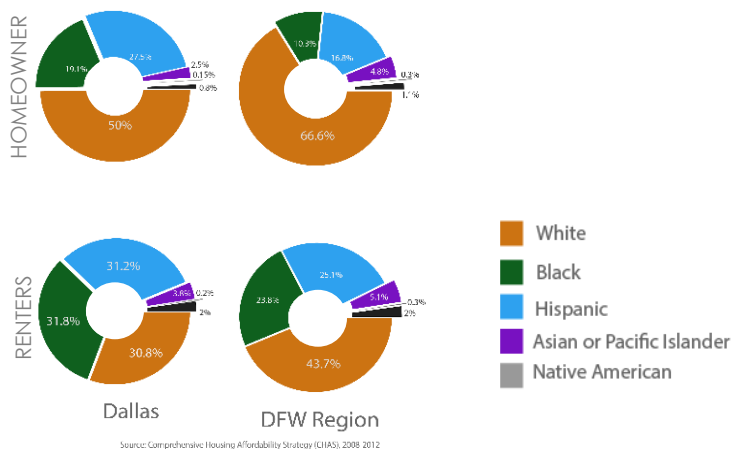
Figure 38: Housing tenure by race/ethnicity, Dallas and DFW (2013)

In Dallas, 50% of homeowners are white, 28% are Hispanic, 19% are black and 2.5% are Asian/PI. This trend becomes more dominant at the regional level, where 67% of homeowners are white, 17% are Hispanic, 10% are black, and 5% are Asian/PI. Renters in Dallas are evenly split between black (32%), Hispanic (31%) and white (31%); Asian/PI represents 4% of the renters. Regionally, renters are not as evenly distributed: 44% white, 25% Hispanic, 24% black and 5% Asian/PI. As opposed to the region, Dallas counts more renters than homeowners.

e. *Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies or practices.*

Segregation within the City of Dallas has increased for all racial/ethnic groups as indicated by the dissimilarity index and mapping of segregation. Segregation at the regional level is generally lower than in the City with the exception of Asian or Pacific Islander/white segregation.

National research, using methods other than the dissimilarity index and focused at a finer census geography i.e., at the block group level, finds that segregation within cities and suburbs has declined. On the other hand, segregation between central cities and their suburbs has intensified, especially as the metropolitan size has increased (Lichter, Parisi, & Taquino, 2015). Current conditions that could contribute to greater increases in segregation in the future, without changes in current state policy include:

- State and city policies that permit source of income discrimination;
- State and city policies that emphasize local community approval for new affordable housing projects;
- State and local policies that limit the amount of available rental and multifamily housing and higher housing densities (eight units per acre and above) (Pendall, 2000);
- National and regional trends in housing prices and property valuations that exceed increases in local wages for service and support workers.
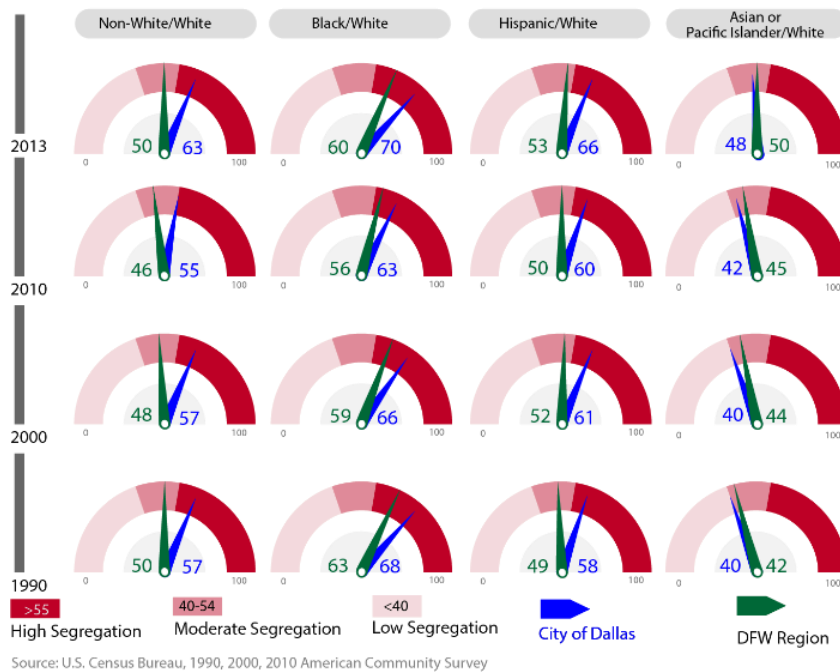
Figure 39: Dissimilarity index, Dallas and DFW region

2. Additional Information

Single mothers with children

The Fair Housing Act prohibits discrimination in housing based on familial status. In other words and with some exceptions, it prohibits discrimination against families with children under the age of 18.

Research has shown that single-mother households are particularly at risk of poverty and housing problems. Indeed, single mothers with young children make up the greatest share of families who are homeless and are at greater risk for homelessness (Culhane, Metraux, Byrne, Stino, & Bainbridge, 2013). Research finds that neighborhoods with the following characteristics have higher rates of homeless residents (Byrne, 2013; Culhane D. P., 1996; Crane, 2008; Culhane D. P., 2008; Early, 2004; Rukmana, 2010):

- higher numbers of single mothers with children under age 6
- higher concentrations of black and Hispanic families
- high rates of unemployment and of domestic violence
- low high school graduation rates
- concentrations of families with income below 75% of the federal poverty rate
- housing crowding, abandonment and vacancy
- higher rent to income ratios

Figure 40 displays the number of households in each Dallas census tract headed by a single mother with children under age 6. Census tracts with darker colors have higher numbers of households (e.g. darkest shade equals 123 to 222 households) and those with lighter shades have lower numbers of households with a single mother with small children (e.g. lightest shade equals 0 to 16 households). Dallas had an estimated 11,660 households composed of single mothers with very young children (ACS 2015).

As denoted with a dotted line, a few clusters of neighborhoods with a relatively high number of single mothers with children can be found predominantly in southwest, south, northeast and east Dallas.
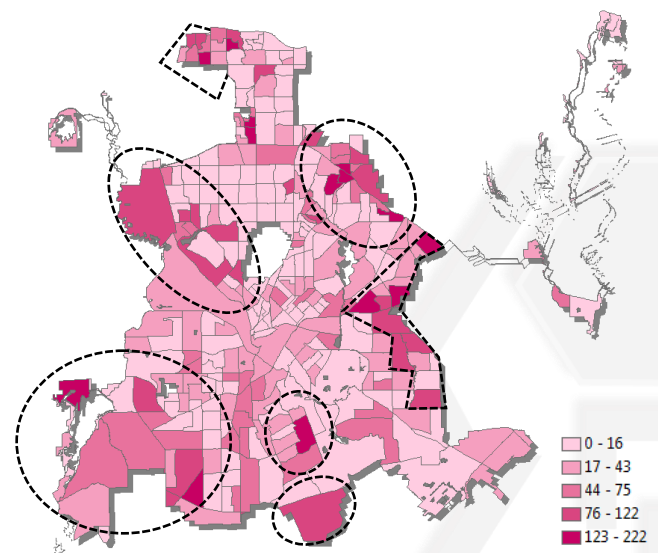
Figure 40: Number of households headed by single mothers with children under age 6 (2015 ACS)

Housing Choice Voucher single mothers with children

Local data was collected from the participating jurisdictions in the North Texas Regional Housing Assessment regarding the residential patterns of Housing Choice Voucher (HCV) families in the region. A total of 27,743 HCV families were located.

More than 3,800 of HCV families residing within the City are led by a single mother with one or more dependents[4]. The map below shows the residential patterns of these families with respect to segregation. It appears that single mother-led families tend to disproportionately reside in Dallas' most segregated neighborhoods (darkest green).
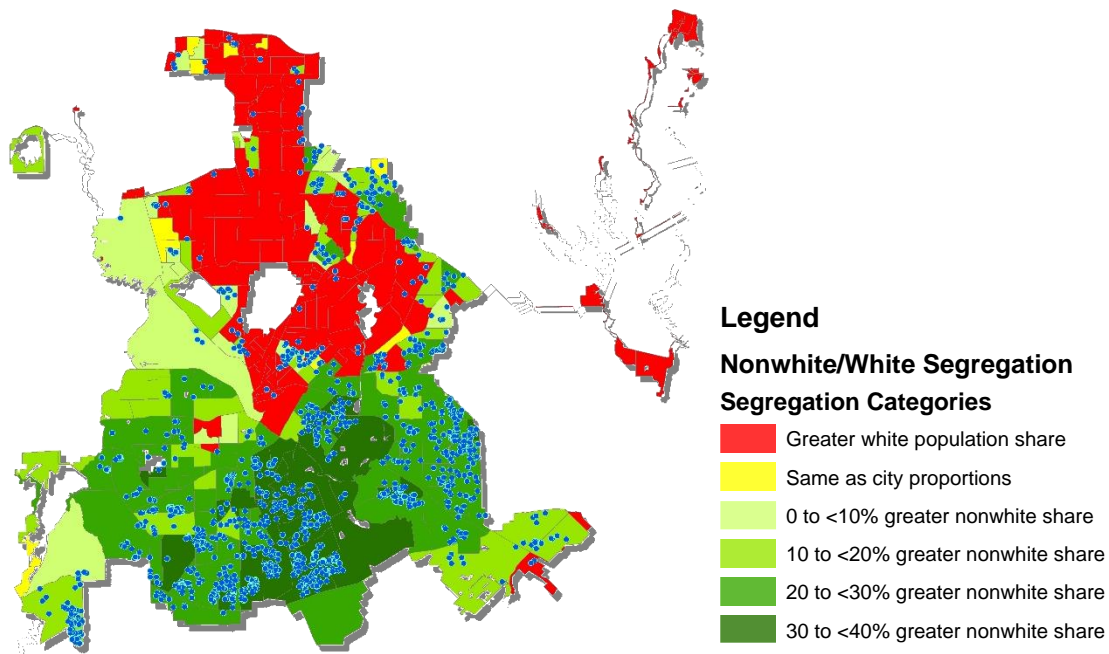
Figure 41: HCV single mothers' residential patterns and segregation (Source: NTRHA, 2017)

Housing Choice Voucher program, source of income discrimination and segregation

The ability of HCV families to secure housing in integrated, opportunity-rich neighborhoods is not only affected by market constraints but also by the ability to use and access information, as well as by discrimination. Research suggests that voucher holders would like to move to higher opportunity neighborhoods but often are unable to do so (Tighe, Hatch and Mead 2017). A justification for their inability to access opportunity-rich neighborhoods is that in most cities and states, local law allows landlords to refuse vouchers. Texas law (TX LOCAL GOVT § 250.007) preempts local governments from protecting housing voucher recipients.

HCV families tend to be disproportionately members of protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. Thus, source of income discrimination against HCV families has the potential of being illegal because members of protected classes are disproportionately harmed (Tighe, Hatch and Mead 2017).

---

[4] Dependents are defined as "people under 18, or with disability, or full-time student

Daniel and Beshara, P.C., conducted a survey of private market-rate multifamily apartment complexes in Dallas to gauge the participation rate of landlords in the HCV program. An overwhelming majority (87%) of the surveyed landlords do not accept vouchers (Inclusive Communities Project, 2017). To further gain insight on the intersection of source of income discrimination, patterns of segregation and the residential living patterns of HCV families, the following maps were created:

- ○ Surveyed landlords refusing vouchers (overlaid with segregation patterns)
- ○ Surveyed landlords accepting vouchers (overlaid with segregation patterns)
- ● HCV residential living patterns (overlaid with segregation patterns)

Figure 43 shows that the surveyed landlords refusing vouchers tend to be disproportionately located in neighborhoods with a significantly greater share of white population than the City average (red shade). As for the surveyed landlords accepting vouchers, they are primarily located in census tracts with a significantly greater share of nonwhite population (Figure 42). Correspondingly, HCV families tend to disproportionately reside outside of neighborhoods in which the surveyed landlords refuse vouchers (red shades, Figures 43 and 44).
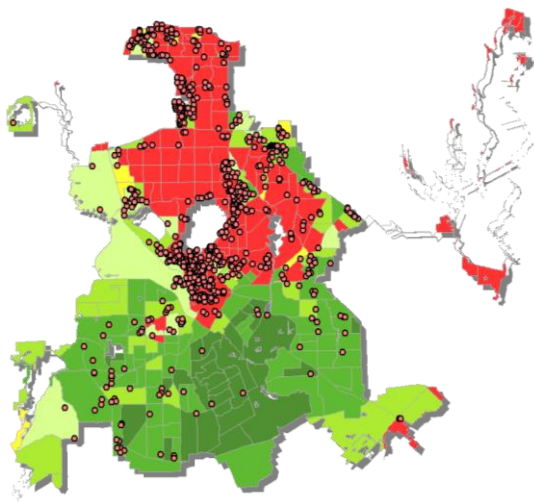
Figure 43: Surveyed landlords refusing vouchers (Source: ICP, 2017)
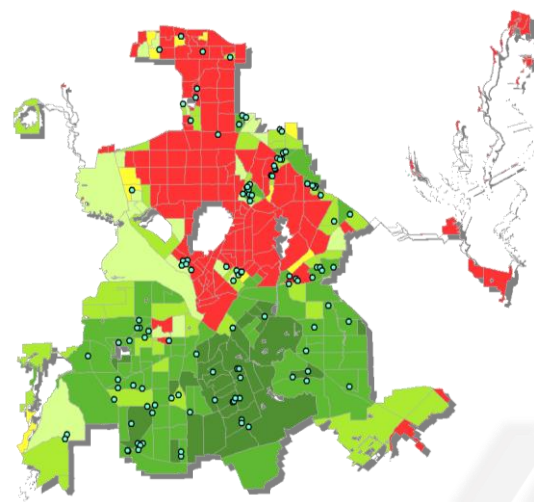
Figure 42: Surveyed landlords accepting vouchers (Source: ICP, 2017)

Legend

Nonwhite/White Segregation

Segregation Categories

🟥	Greater white population share
🟨	Same as city proportions
🟩	0 to <10% greater nonwhite share
🟩	10 to <20% greater nonwhite share
🟩	20 to <30% greater nonwhite share
🟩	30 to <40% greater nonwhite share
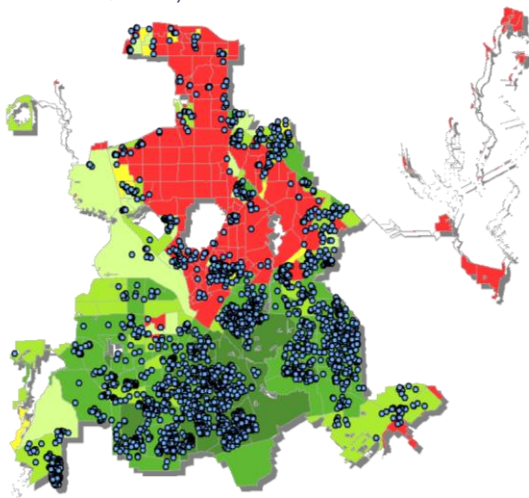
Figure 44: HCV residential patterns and segregation (Source: NTRHA, 2017)

Supportive Housing for the Elderly (Section 202) and for Persons with Disabilities (Section 811), Project Based Section 8

The Fair Housing Act prohibits discrimination on the basis of race, color, national origin, religion, sex, familial status and **disability**. While age is not explicitly designated as a protected class (aside from familial status considerations), disabilities tend to be more predominant among older individuals. It is important to note that the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 CFR Part 146 prohibit age discrimination in the provision of services or programs receiving federal financial assistance.

Within that context, the following sections examine the residential patterns of HUD-subsidized households with a disability that are participating in Supportive Housing for Elderly (Section 202), for Persons with Disabilities (Section 811) and the project based voucher programs.

Figure 45 shows locational characteristics and resident-related information for Section 202 and Section 811 housing developments within the City of Dallas. Nine supportive housing for elderly (Section 202) and three for persons with disabilities (Section 811) exist within the City.
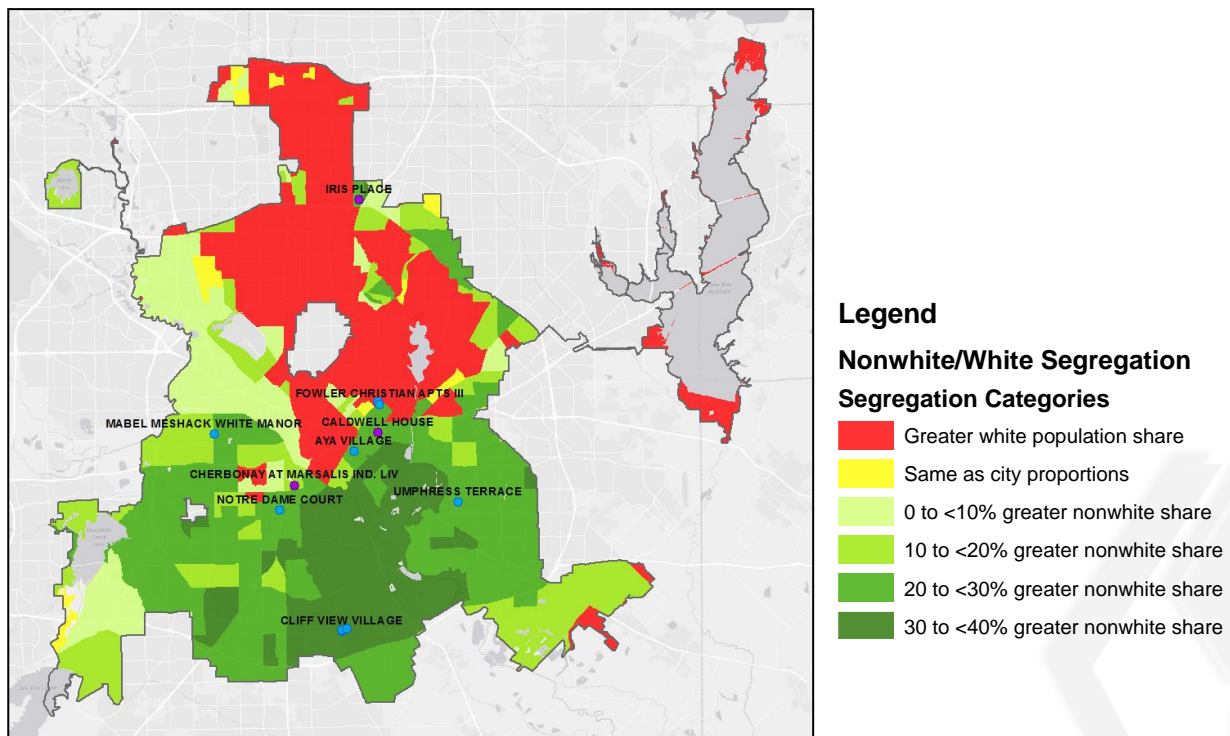
Figure 45: Section 202 and Section 811 supportive housing developments and segregation patterns

As depicted in the table below, nine out of the 11 supportive housing developments are located in census tracts with a share of nonwhite 20%-40% greater than the City average (darkest shades of green). Distinctively, Fowler Christian Apartments II and III are located in a census tract with a greater white population share than the City average. These two developments also compose a significantly lower proportion of extremely low-income households compared to other 202 and 811 supportive housing developments. On the other hand, Fowler Christian Apartments II and III contain the highest proportions of HUD-assisted households with a disability (respectively 18% and 11%) among 202 housing developments.

Table 22: Section 202 and section 811 supportive developments' characteristics (disability, segregation, poverty rate)

Program	Name	Number Subsidized units	Percent VLI	Percent ELI	Percent assisted HHWD	R/ECAP 2016	Percent Nonwhite	Poverty Rate	Seg Grade
202_PRAC	CLIFF VIEW VILLAGE	28	100	**86**	0	0	99	20	**6**
202_PRAC	MABEL MESHACK WHITE MANOR	65	100	**92**	3	**1**	91	**55**	5
202_PRAC	AYA VILLAGE	29	100	**89**	7	0	90	34	5
202_PRAC	CLIFF VIEW VILLAGE II	27	100	**88**	0	0	97	35	**6**
202_PRAC	FOWLER CHRISTIAN APARTMENTS II	20	95	57	18	0	**29**	11	1
202_PRAC	CLIFF VIEW VILLAGE III	27	100	**88**	0	0	99	20	**6**
202_PRAC	UMPHRESS TERRACE	53	98	**83**	2	0	90	24	5
202_PRAC	NOTRE DAME COURT	68	100	**93**	1	0	92	24	5
202_PRAC	FOWLER CHRISTIAN APTS III	36	100	59	11	0	**29**	11	1
811_PRAC	IRIS PLACE	18	100	**89**	100	0	91	29	5
811_PRAC	CALDWELL HOUSE	6	Null	Null	Null	0	94	39	5
811_PRAC	CHERBONAY AT MARSALIS IND. LIV	11	Null	Null	Null	0	81	21	4
TOTAL		388				1			

VLI: Very Low-Income
ELI: Extremely Low-Income
HHWD: Households with a disability
R/ECAP: 1(Yes)/ 0 (No)
N/A: Not Applicable
Null: Missing Value

Segregation Grade (2015)
Nonwhite share 30% to 40% greater than jurisdiction: **6**
Nonwhite share 20% to 30% greater than jurisdiction: **5**
Nonwhite share 10% to 20% greater than jurisdiction: **4**
Nonwhite share 0% to 10% greater than jurisdiction: **3**
Nonwhite share similar to jurisdiction's share: **2**
Greater White population share than jurisdiction:

Loan originations and residential living patterns

Several factors can shape residential living patterns and hence the level of segregation or integration in the City of Dallas and the region. Such factors may include the distribution of private investments, both in number and geographically. The ability of residents to secure funding for new homes or new businesses can restrict the likelihood of residents moving to new opportunities. One way to measure this is to evaluate the amount and types of **financial investments** present in communities from local banking institutions. The Home Mortgage Disclosure Act (HMDA) and the Community Reinvestment Act (CRA) are federal regulations that require similar record keeping and provide a wealth of information on the level of financial investment in communities. An analysis of their data is included below at the county and regional level categorized by race, ethnicity and income bracket.

Home Mortgage Disclosure Act (HMDA)

The HMDA is implemented by the Consumer Financial Protection Bureau's Regulation C, mandating that financial institutions report on loans, applications and other information. The charts utilized here show data compiled from reported mortgage application denials in 2016 (Federal Financial Institutions Examination Council, 2018).

A few key findings emerge from the data collected and analyzed:

- White households represent a substantially higher share of all loan applicants in the county and region.
- Credit history is a preeminent reason for denial respectively for black and American Indian households in Dallas County.
- Debt-to-income ratio is a dominant reason for loan denial for white and Asian/Pacific Islander households in Dallas County.
- The predominant reasons for denial across all racial groups are credit history and debt-to-income ratio.
- For all racial groups except for black households, the majority of accepted loans are for home purchasing.
- For white households, the majority of accepted loan applications are for home purchasing. On the other hand, the majority of denied applications are for refinancing purposes.
- For black households, the majority of accepted loan applications are for refinancing. A lower share of accepted applications is for home purchases.
- The rate of approval/denial is comparable across racial and ethnic groups.
- Regional and county patterns remain relatively comparable, with the exception of black households registering a higher rate of approval for home purchasing (+5 percentage points) at the regional level.

The two charts below show the number and corresponding percentages of mortgage applications denied in Dallas County and the region, classified by race and reason for denial. Percentages within each race column represent 100% of the recorded home mortgage denials. Regional figures are available in the appendix.
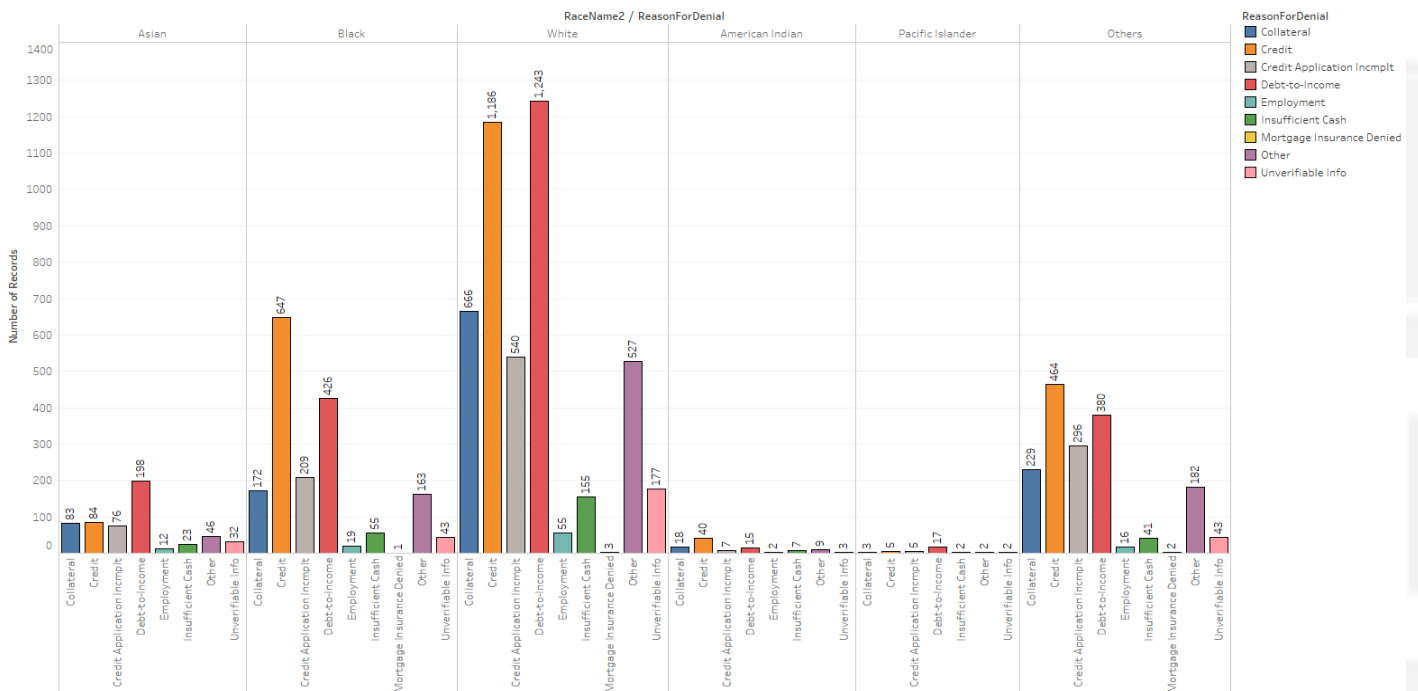
Figure 46: Denied HMDA applications with reason for denial by race, Dallas County (count)
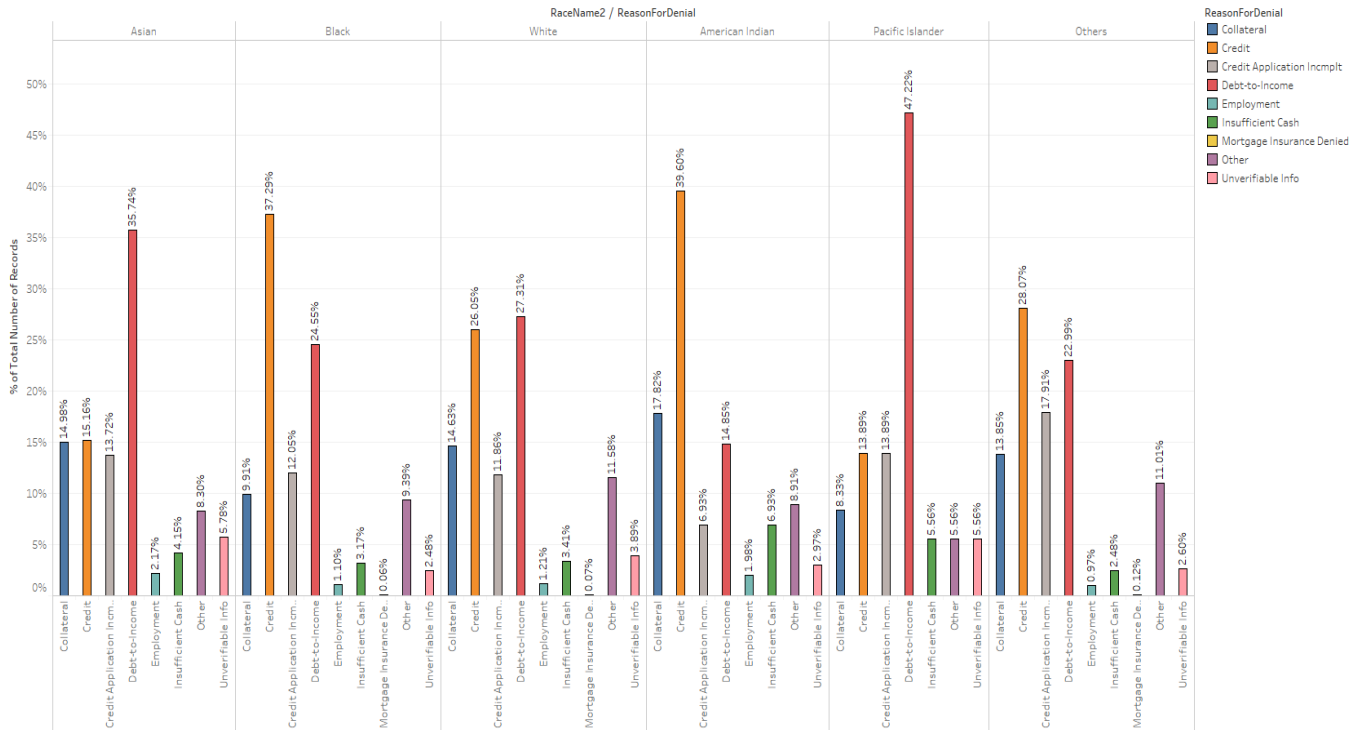
Figure 47: Denied HMDA applications with reason for denial by race, Dallas County (percent)

The following charts display the rate of denial and approval by race and loan purposes for Dallas County and the region, respectively.
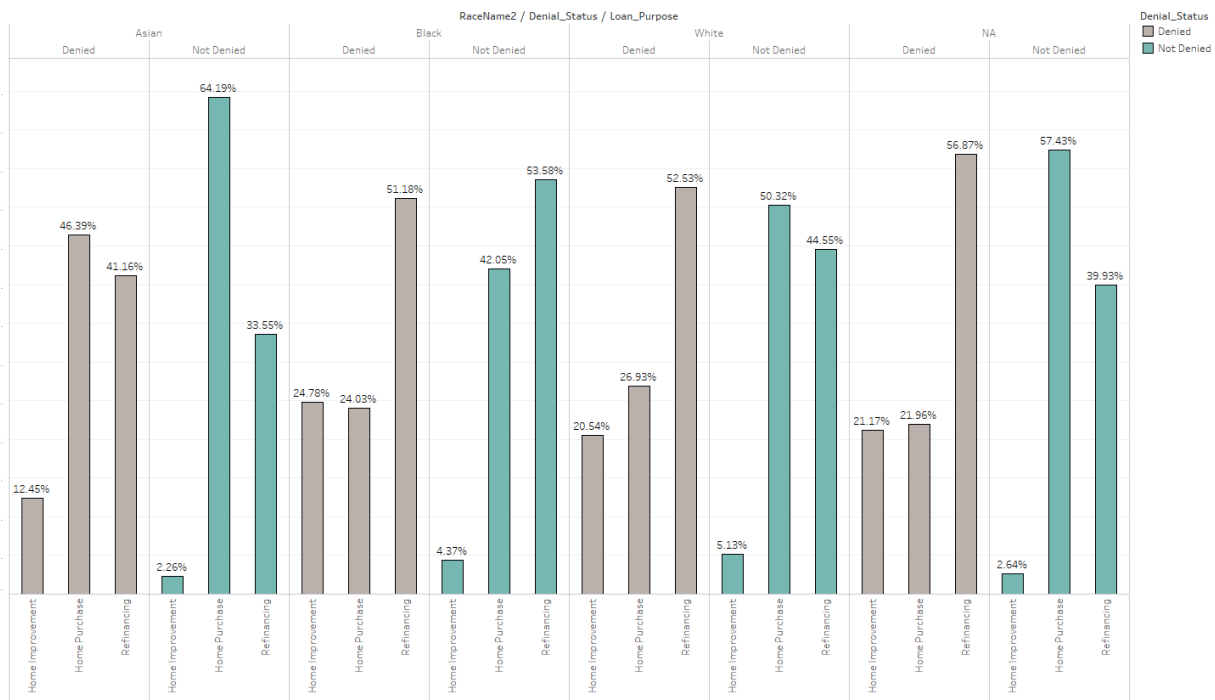
Figure 48: HMDA denial rate by loan purpose and race, Dallas County (percent)
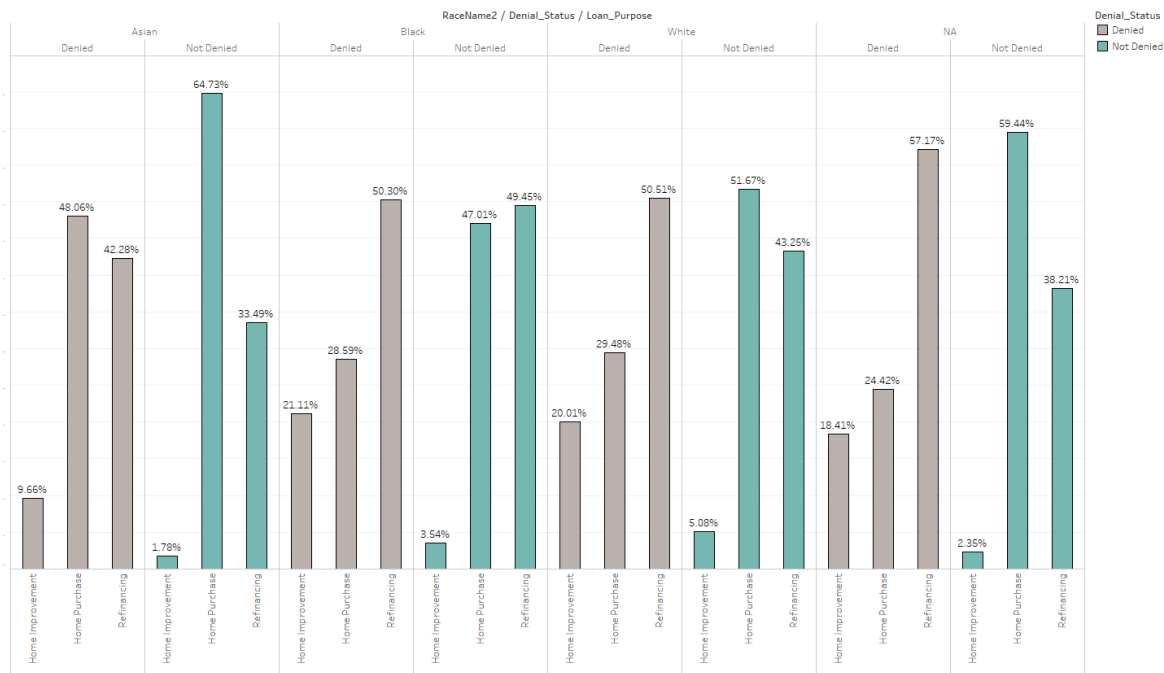
Figure 49: HMDA denial rate by loan purpose and race, DFW region (percent)

Community Reinvestment Act (CRA)

The Community Reinvestment Act (CRA) was enacted by Congress in 1977 (12 U.S.C. 2901) to **prevent redlining and encourage banks to provide financial services that meet the needs of their communities** (Federal Financial Institutions Examination Council, 2016). Redlining is denying or using methods to increase the cost of banking to residents of racially distinct neighborhoods, which can lead to high amounts of segregation and low amounts of integration (Office of the Comptroller of the Currency). Encouraging banks, credit unions and other financial institutions to meet the credit needs of the communities in which they operate encourages them to tailor their financial offerings/programs to the needs of the entire community, including **meeting the needs of residents in low- and moderate-income neighborhoods** (Office of the Comptroller of the Currency, 2014).

The CRA was created to **assist in the rebuilding and revitalization of communities** using sound business judgment and lending practices (Office of the Comptroller of the Currency, 2014). Although the CRA requires financial institutions to meet the needs of the communities in which they are located, it does not require specific ratios or benchmarks that each institution must meet (Office of the Comptroller of the Currency, 2014). Instead, the CRA provides a framework for financial institutions and community organizations to collaborate to promote the availability of different types of credit and banking services in low- and moderate-income neighborhoods (Office of the Comptroller of the Currency, 2014). In addition, CRA has encouraged banks to provide substantial commitments to state and local governments and community development organizations to increase lending to underserved segments of local economies and populations (Office of the Comptroller of the Currency, 2014).

Table 23 shows the total value of the CRA loans made to small businesses by institutions in Dallas County categorized by the median family income of the business applicant's census tract. Columns two through four categorize the total amount loaned by the size of the loan. Column five shows the amount of money loaned to small businesses (revenue less than or equal to $1 million).

Thirty-nine percent of Dallas County CRA loans went to businesses located in census tracts where family incomes are greater than 120% of the area median income for the DFW MSA. Around 15% of CRA dollars went to communities with median incomes below 50% of area median income. Significantly fewer CRA dollars are going to lower income census tracts; this disproportionately affects minority residents who are more likely to live in census tracts with lower median incomes.

Table 23: CRA small business loans by census tract income, Dallas County

% of Area Median Family Income	Loan Amount at Origination < $100,000	Loan Amount at Origination > $100,000 But < $250,000	Loan Amount at Origination > $250,000	Loans to Businesses with Gross Annual Revenues < $1 Million	TOTAL Dollars Loaned	TOTAL % of Dollars Loaned
Dallas County, TX	(Number in 1,000s)					Percent
10-20%	275	0	947	6	1,228	0.0
20-30%	2,334	1,181	4,011	2,841	10,367	0.3
30-40%	31,759	14,647	76,273	28,689	15,1368	4.9
40-50%	75,431	38,671	132,173	68,650	31,4925	10.3
50-60%	89,941	47,152	203,554	81,626	422,273	13.7
60-70%	47,467	17,423	56,663	39,751	161,304	5.3
70-80%	34,430	12,190	49,999	29,106	125,725	4.1
80-90%	62,866	24,814	101,086	64,385	253,151	8.2
90-100%	55,838	19,704	97,294	50,538	223,374	7.3
100-110%	35,143	11,043	28,193	31,768	106,147	3.5
110-120%	26,566	8,849	23,441	17,099	75,955	2.5
>= 120%	295,098	125,761	456,918	311,458	1,189,235	38.7
MFI Not Known	5,064	2,114	9,378	2,107	18,663	0.6
Tract Not Known	9,881	1,461	1,529	4,600	17,471	0.6
TOTAL	772,093	325,010	1,241,459	732,624	3,071,186	100%

The following maps show the distribution of CRA loans by census tracts: darker shade means greater amount. Overall, greater amounts are granted in the northern than the southern sector of the City. Distinctively, census tracts south of I-20 received a greater number of loans than the southern sector (Red Bird area, southeast Oak cliff, Mountain Creek).

R/ECAPs are census tracts characterized by a nonwhite population of at least 50% and a poverty rate of 40% or more (considered extreme poverty). R/ECAPs are delineated in pink in the following map. Overall, R/ECAP census tracts are characterized by a relatively low loan amount. A few exceptions exist, notably for the R/ECAP south of I-20 and the one in the Vickery Meadow area.

Legend

R/ECAP 2016

Loan (in 000s)

$10 - $757

$757.01 - $1,794

$1,794.01 - $3,763

$3,763.01 - $7,463

$7,463.01 - $180,848
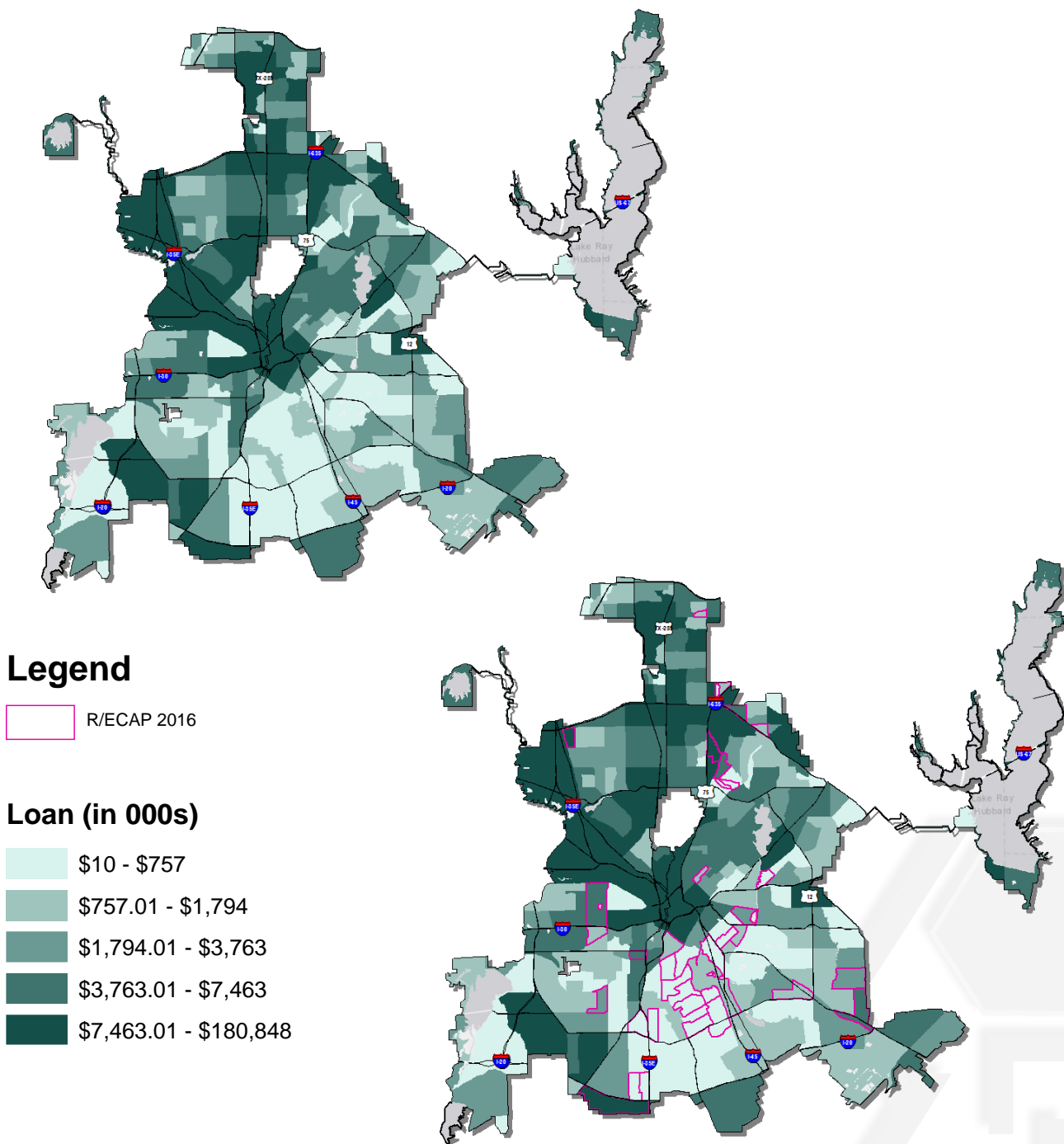
Figure 50: CRA small business loans amount by census tract overlaid with R/ECAPs, Dallas

The City of Dallas has a long-established and documented legacy of segregation (Huyn & Kent, 2015; McCormick, 2017; Opportunity Dallas, 2017). The compounding barriers of segregation faced by communities in Dallas are multiple. A study conducted by the Pew Research Center (2015) found that Dallas is not only segregated along racial lines but also economically. Harvard-led research conducted by Raj Chetty and his colleagues (2015) found a strong negative correlation between segregation (racial and economic) and relative economic mobility.

Unless addressed, persistent residential segregation in Dallas is likely to inhibit the economic mobility of vulnerable communities, altogether deepening stark disparities. The severity of segregation, coupled with systemic barriers (i.e. source of income discrimination), highlights the critical need for targeted place-based investments.

Neighborhood Plus Plan

In 2015, Dallas developed and adopted a Neighborhood Revitalization Plan that focuses on alleviating poverty, fighting blight and enhancing rental options, among other things. The plan identifies 12 Neighborhood Plan (NP) focus areas, namely:

- Elm Thicket-Northpark
- Red Bird
- Kiest Cliff
- The Bottom
- Pemberton Hill
- Arcadia Park
- Skyline
- Bonnie View
- Casa View
- Family Corridor
- Coit/Spring Valley
- Vickery Meadow

At the intersection of place-based investments and the issue of segregation, this section assesses place-based investments intended to foster economic and racial integration in Dallas.

A few patterns emerged from mapping NP focus areas and reviewing their respective Strategic Neighborhood Action Plans (SNAP):

- The designated Neighborhood Plus Plan focus areas greatly vary in racial/ethnic composition. Several designated areas respectively cover predominantly white areas, and census tracts with a nonwhite population share less than 10% greater than city average. A few other designated areas encompass census tracts with a nonwhite population share between 20% and 30% greater than city average.

- Neighborhood Actions Plans appear to primarily focus on community engagement and participatory planning. As such, these action plans aim at developing a community-driven vision for development as opposed to

Figure 51: Neighborhood Plan focus areas (Source: City of Dallas website)
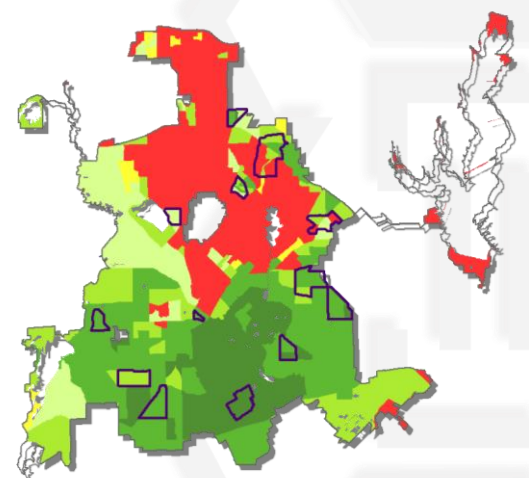
Figure 52: Segregation patterns and Neighborhood Plus focus areas

delivering major revitalization/infrastructure investments that foster integration and combat segregation.

- The issue of segregation is not documented, and it does not seem to be a factor of Neighborhood Plus revitalization efforts.

GrowSouth Initiative

The GrowSouth (GS) initiative is another major place-based investment strategy led by the City of Dallas since 2012 to bring economic development to the southern half. The economic development strategy set forth identified eight focus areas that are divided into three categories as displayed in the map and table below. Given the clustering of highly segregated neighborhoods in the southern sector and the intentional geographical focus of GrowSouth, great overlap exists between the GS focus areas and areas of high segregation.
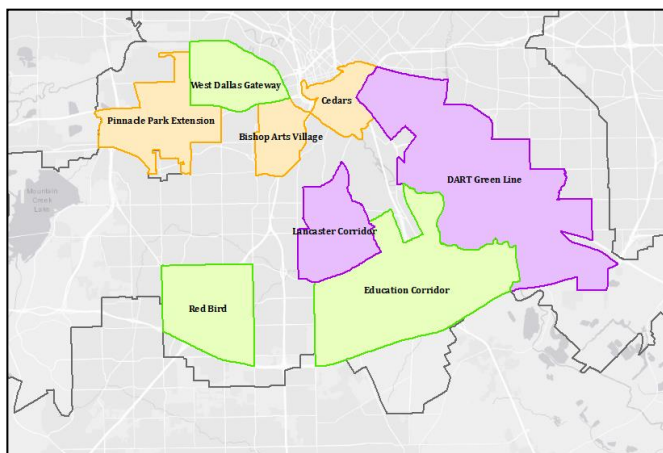
Figure 53: GrowSouth focus areas

Table 24: GrowSouth focus areas' categories

GrowSouth Focus Areas		
Category 1	Category 2	Category 3
Pinnacle Park Expansion	Education Corridor	Lancaster Corridor
North Oak Cliff (Bishop Arts Village)	Red Bird	Dart Green Line
Greater Downtown/ Cedars	West Dallas Gateway	
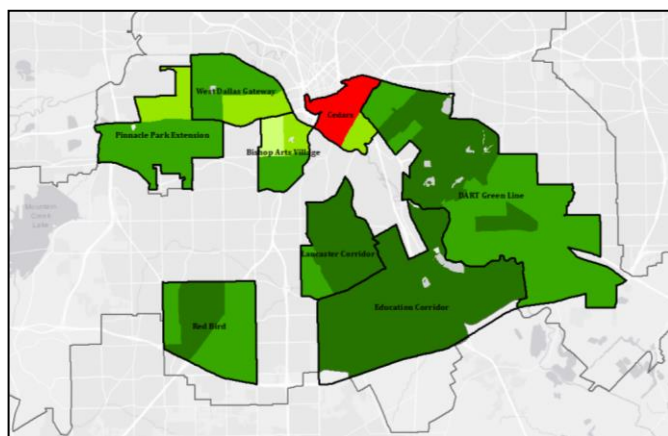
Nonwhite/White Segregation
Segregation Categories

- Greater white population share
- Same as city proportions
- 0 to <10% greater nonwhite share
- 10 to <20% greater nonwhite share
- 20 to <30% greater nonwhite share
- 30 to <40% greater nonwhite share

Figure 54: GrowSouth focus areas and segregation patterns

A progress report, released in May 2018, shows noticeable trends across GS focus areas. Overall, from 2012 to 2017[5], there has been:

- an increase in population
- an increase in residential investments accompanied by an increase in median home sales prices
- a decline in public school enrollment
- a decline in property crime accompanied by an increase in violent crime

The performance across community indicators, namely measures of commitment, resilience and amenities, differs across GS focus areas. Distinctively, the Education Corridor, Red Bird area and the DART Green Line areas registered a greater number of negative marks across community indicators (total of 12 indicators).

Table 25: Indicators' negative change in value across GrowSouth focus areas

Focus Area	Cedars	Education Corridor	Red Bird	DART Green Line
Negative Change in value 2012-17	Percentage of residents with a Bachelor's degree or higher	Residential Investment	Percentage of residents with a Bachelor's degree or higher	Local Public School enrollment
	Public High School Graduation Rate	Percentage of residents with a Bachelor's degree or higher	Labor Force Participation	Percentage of residents with a Bachelor's degree or higher
	Labor Force Participation	Public High School Graduation Rate	Violent Crimes per 1,000 Residents	Labor Force Participation
	School Performance	Violent Crimes per 1,000 Residents	School Performance	Violent Crimes per 1,000 Residents
		School Performance		

While the listed community indicators are important to gauging the economic impact of revitalization efforts as it pertains to racial/ethnic segregation, capturing the change in socio-demographics is equally indispensable. The table below shows the change (2012-2016) in racial/ethnic composition as well as the share of families living in poverty for each GS focus area.

Collectively, GS focus areas have seen an increase in white population of close to 1% from 2012 to 2016. This change in white/nonwhite population share is accompanied by a decrease increase in Hispanic population (2%) and a slight decrease of 1.2% in the share of the population living in poverty.

---

[5] While the report shows a 2012-2017 timeframe, many of the listed indicators such as population, per capita income, education and labor force participation do not extend beyond year 2016 (latest U.S. Census Bureau American Community Survey available to date).

Table 26: Change in racial/ethnic composition and poverty rate across GrowSouth focus areas (2012-2016)

	Race (Nonwhite) 2016		Ethnicity (Hispanic/Latino) 2016		Poverty 2016	
	Count	Percent	Count	Percent	Count	Rate
All Focus Areas	202,558	93%	101,334	46%	69,837	32%
Change in population and % point	*-5,419*	*-0.7%*	*+8,406*	*-1.7%*	*+1,012*	*-1.2%*
Pinnacle Park Expansion	23,557	92%	21,118	83%	7,736	30%
Change in population and % point	*+2,208*	*+3.5%*	*+2,220*	*+4.1%*	*+917*	**+1.9%**
North Oak Cliff (Bishop Arts Village)	16,749	85%	14,755	75%	5,257	27%
Change in population and % point	*-2,054*	*-3.3%*	*-2,132*	*-4.4%*	*-1,621*	*-5.7%*
Greater Downtown/ Cedars	4,838	61%	1,401	18%	2,594	33%
Change in population and % point	*+961*	*-4.9%*	*+428*	*+1.1%*	*+950*	**+4.5%**
Education Corridor	25,393	98%	3,057	12%	7,277	29%
Change in population and % point	*+687*	*-0.4%*	*+1,597*	*+6%*	*-1,405*	*-6.5%*
Red Bird	24,852	97%	4,784	19%	6,262	24%
Change in population and % point	*+3,005*	*+1.7%*	*+2,304*	*+7.8%*	*+1,469*	**+3.6%**
West Dallas Gateway	13,309	87%	6,748	44%	5,431	36%
Change in population and % point	*-743*	*-8.2%*	*-1,770*	*-13.6%*	*-745*	*-6.8%*
Lancaster Corridor	28,724	98%	9,861	34%	11,212	38%
Change in population and % point	*+2,389*	*-1%*	*+2,496*	*+5.9%*	*+1,921*	**+3.3%**
Dart Green Line	65,136	94%	39,610	57%	24,068	35%
Change in population and % point	*+1,920*	*+0.2%*	*+3,263*	*+3.2%*	*-474*	*-1.7%*

Overview of Changes
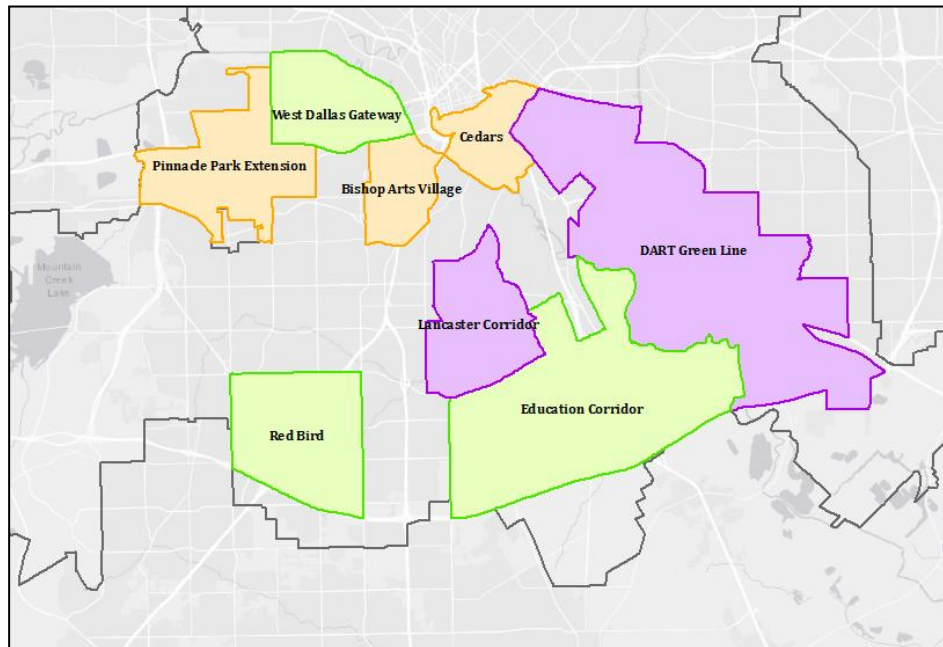
Figure 55: GrowSouth focus areas

While the GS focus areas collectively registered a decrease in nonwhite population from 2012 to 2016, the magnitude of the decrease greatly varies. The highest decrease was registered for the West Dallas Gateway (-8.2%), followed by the Greater Downtown/Cedars areas (-4.9%). It is important to note that as of 2015 and as depicted in the segregation map, most of the Greater Downtown/Cedars already included a greater share of whites than the City's overall share of the white population. This might indicate gentrification dynamics. On the other hand and in contrast to the other focus areas, the nonwhite population in Pinnacle Park Expansion and the Red Bird areas increased respectively by close to 4% and 2%. Correspondingly, these areas remain disproportionately nonwhite (92% and 97%, respectively).

From 2012 to 2016, the share of Hispanic population increased in most GS focus areas with the exception of the north Oak Cliff and west Dallas Gateway areas. These areas, which respectively registered a significant decline of approximately 4% and 14% in Hispanic population, have been identified in several studies as gentrifying areas.

While the majority of the GS focus areas recorded positive change in community indicators (i.e. residential investments, median home sales price), half of these areas also have seen an increase in poverty rates ranging from 2% to 5%. This increase could potentially be explained by pre-existing poverty trends outpacing the economic benefits of GrowSouth investments and/or because the economic benefits of GrowSouth tend to benefit residents outside of the focus areas or due to an influx of people living in poverty.

A review of the change in race, ethnicity and poverty rate of the GrowSouth focus areas offers important considerations to inform and coordinate revitalization strategies, siting of affordable housing and poverty de-concentration efforts.

Mobility Programs

In the Dallas metropolitan area, patterns of segregation set the stage for litigation in Walker v HUD beginning in 1985 (Daniel & Beshara, P.C., 2018). The initial lawsuit was against the City of Mesquite, a suburb of Dallas, where the plaintiff was prevented from using a Section 8 voucher. The Walker decision found that "certain housing programs prevented minorities from moving into non-minority areas of Dallas" and the surrounding suburbs (Dallas Housing Authority, 2012). The court ordered, among other remedies, that programs be established to facilitate the use of rental subsidy vouchers in predominantly white, lower poverty communities (Debra Walker, et al., v. U.S. Department of Housing and Urban Development, et al., 2001).

The Mobility Assistance Program, operated by Inclusive Communities Project (ICP), resulted from the Walker Settlement and serves residents participating in the Dallas Housing Authority's Housing Choice Voucher program. Families are assisted in using vouchers to obtain housing in higher opportunity areas in seven counties.

The DHA was provided funds for mobility counseling in the form of moving expenses. Those funds are now exhausted. However, in 2017 DHA expended over $1 million on mobility counseling, landlord bonuses, application fees, security deposits, moving expenses and utility deposits. To reverse patterns of segregation, Walker Settlement Voucher holders (currently 579 families) must move to housing in a Walker Targeted Area (HOAs) defined as a census tract in which the poverty rate is less than or equal to 22.3%, the black population is less than or equal to 25.7%, and where no public housing is located (Inclusive Communities Project, 2013). ICP further assists DHA voucher holders to relocate in high-opportunity areas, defined as census tracts in which residents have incomes at or above 80% of area median income, no more than 10% of residents have incomes below the federal poverty rate, and public schools meet the standards of the Texas Education Agency and have 4-year graduation rates of 85% or higher.
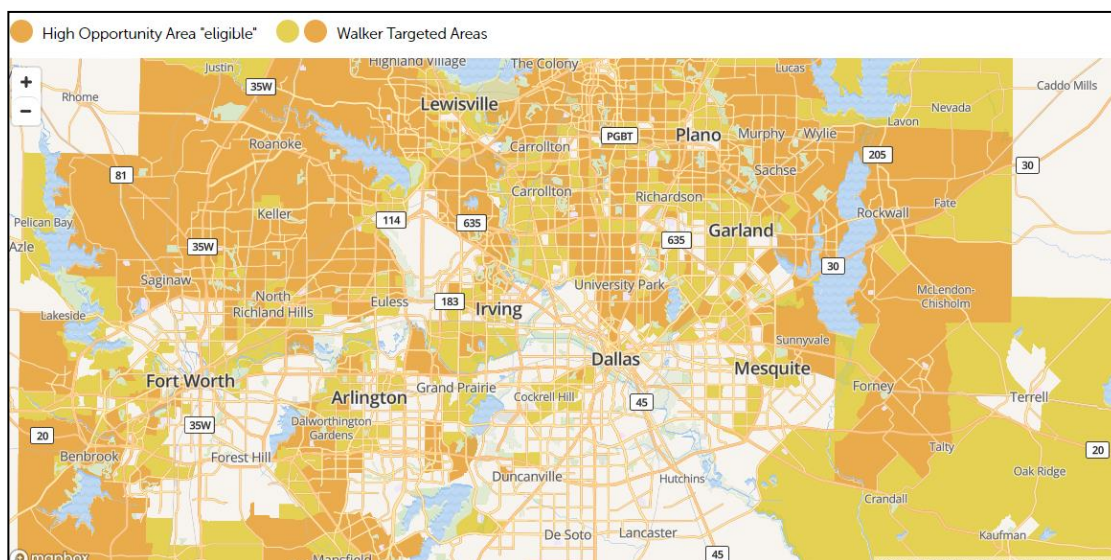
Figure 56: ICP designated high-opportunity area and walker targeted areas

The map below displays the boundaries of the cities and housing authorities engaged in the North Texas Regional Housing Assessment. The housing authorities of McKinney, Plano, Fort Worth, Denton, Greenville, Frisco, City of Dallas and Dallas County have significant areas of overlap. Housing authority jurisdictions overlap such that a single rental property may include residents holding vouchers from several housing authorities.

REGIONAL LANDSCAPE

Dallas HA
Dallas County HA
McKinney HA
Greenville HA
Denton HA
Plano HA
Fort Worth HS
City of Dallas
City of Frisco/HA
City of Garland/HA
City of Plano
City of McKinney
City of Denton
Royse City HA
City of Irving
Ennis HA
Waxahachie HA
Ferris HA
Grandview HA
Cleburne HA

Figure 57: NTRHA participating entities and their jurisdictions

3. Contributing Factors of Segregation

During the first round of public meetings and focus groups, participants were asked to identify contributing factors to the seven fair housing issues at the heart of the AFH tool[6]. The issue of segregation ranked second – after the issue of disparities in access to opportunity – in generating the most comments from participants.

The most frequently cited contributing factor to segregation was **discrimination**. The issue of discrimination manifests itself in many compounding ways: through community opposition, source of income discrimination, lending discrimination and private discrimination. Participants reported that the issue of segregation is notably due to community opposition and the stereotyping of the black and Hispanic communities. Community opposition to affordable and low-income housing ("Not In my Back Yard") was not only primarily denounced by attendees, but also substantiated by other participants' comments positing that "affordable housing brings crime" or alluding that the conditions in segregated areas were the result of behaviors and choices made by the individuals living there.

Similarly, participants said the prerogative of landlords to refuse vouchers also significantly contributes to segregation by deterring relocation to non-segregated areas. In addition, participants reported private discrimination practices where individuals with disabilities were "not given opportunities like other folks" and where apartment complexes reported different availability/vacancy of units to individuals of different races. While comments may appear anecdotal, it is important to note that these issues of discrimination were invariably raised at all public meetings.

The second most cited set of factors contributing to segregation in Dallas included the **loss of affordable housing**, the **displacement** of residents due to economic pressures, and the **location and type of affordable housing**. Residents reported that "apartment complexes were demolished to build new apartments out-of-reach for low-incomes, pushing the residents out". Similarly, participants explained that there is a lack of affordable housing in areas like Uptown, forcing them "to go to west Dallas or Oak Cliff in order to get something that is achievable".

Finally, residents pointed to the **institutional factors** contributing to segregation, including the location of proficient schools and **school assignment policies**, as well as land use and **zoning laws** and the **lack of public investments and revitalization strategies**. Corroborating the findings of the Pew Research Center (2015), public meeting participants discussed the state of economic segregation. Commenters notably attributed residential patterns of economic segregation to the real estate premium associated with access to good schools. One participant said: "I want to move by the great schools, well guess what, you're going to pay for it in real estate and that's true. The nice schools go right in line with the wealth of the area." Another participant added that "there is a high demand for education in that area, so if this school right here is high class and classified as one of the top schools in Dallas or in Texas, I promise you that the houses around it are going to be triple the value than the ones that are somewhere else. The school is what is making the house price rise. It is all tied to DISD."

---

[6] Segregation/Integration, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing Analysis, Disability and Access Analysis and Fair Housing Enforcement, Outreach Capacity and Resources Analysis.

Public meeting participants also stated that investments in poverty areas were insufficient and inadequate, pointing to the "historic **disinvestment**" in these areas. Additionally, some residents argued that local policies and "the way the City of Dallas directs its subsidies contributes to segregation", specifically referring to the TIF programs and the subsidies granted to developers to provide affordable housing.

Sample AFH public engagement

The following comments from public meetings, focus groups and surveys express public participants' views about racial and economic segregation, discrimination, the role of schools and local policies and practices:

Answering "What are the contributing factors to segregation?"

- "Discrimination. Some people will not accept vouchers in certain areas"
- "Recruiting only goes to certain schools"
- "We have over 70% of staff of the City of Dallas who do not live here. It's all tied to DISD. The integration is not so much racial but economic. People that can afford to send their children to private school define how integrated the neighborhood becomes"
- "The way the City of Dallas directs its subsidies contributed to segregation, meaning the money that goes to developers. The way they define affordable. Townhomes that cost $280,000, workers in that area cannot afford to live in the place like that"
- "There hasn't been the same priority in the budget to cover housing needs in the area. The housing *(situation)* is a by-product of that TIF program"
- "The school is what is making the house price rise"
- "Schools that are highly rated, they're going to be in your more economically advantaged areas"
- "I live in District 9. Three apartment complexes were demolished to build new apartments out of reach for low incomes. Pushing the residents out"
- "The ability of landlord to look over vouchers"
- "The black community has always been stereotyped. They view blacks as criminals. Blacks are ostracized. They have always been concentrated in those areas. The stereotype of African American has contributed to the segregation."
- "Some individuals influence policies and politics in the City of Dallas and decide how things are developed and where development should occur. The decision-makers are of the important groups that contribute to segregation. Economic mobility is influenced by decision-makers because they don't give people the opportunity to move from level to another."
- "Historical factors that relate to segregation. You can't ignore the fact of historic disinvestment"
- "Racism", "NIMBYism"
- "We have investments going into poverty areas but they are not adequate … no awareness of the enormity to change the community"
- "Failure of the city to invest in truly affordable housing, lack of protections for tenants"
- "There is not wealth passed on from generation to generation"
- "Redlining banks and insurance companies did not help individuals get insured or loans"
- "Life is not equitable in these areas"
- "Policies tend to encourage segregation"

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

a. *Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.*

To assist communities in identifying racially or ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test (HUD, 2017). R/ECAPs must have a **nonwhite population of 50 percent** or more and a **poverty rate of 40 percent** or more (extreme poverty). Poverty rate is based on the number of individuals living at or below the poverty line within a given census tract.

2015   **2016**

Legend
R/ECAP
☐ Yes

Figure 58: R/ECAPs 2015 and 2016, Dallas

In 2015, R/ECAP tracts (in pink) were primarily located in south Dallas; east, west and central Oak Cliff; and the Red Bird area. Other R/ECAPs were found in west Dallas and northern sectors (Vickery Meadow and far northeast Dallas). In 2016, R/ECAPs in the southern sector remained, while new R/ECAPs appeared in northwest Dallas and far southeast Dallas.

In the region, Dallas and Tarrant County contain most of the R/ECAPs (Figure 59). Inside Dallas County but outside Dallas, R/ECAPs exist in Carrollton near I-35E, north Desoto and Garland.

In Fort Worth, the R/ECAPs concentrate in the southeast from downtown to I-820. Other locations in Fort Worth include an area between I-35W and US 287 along SH 183, Lake Como and areas around the Naval Air Station and Texas Christian University. Inside Tarrant County but outside Fort Worth, R/ECAPs exist in central Arlington and west Grand Prairie near SH 360.

Outside Dallas and Tarrant counties, four other counties contain R/ECAPs. Collin County has a R/ECAP in north Dallas near SH 190. Denton County has a R/ECAP in south Denton. Ellis County has a R/ECAP in Ennis. Hunt County has two R/ECAPs – one in Commerce (2016) and one in Greenville (2015).

Figure 59: R/ECAPs 2013 (top) and 2015 (bottom), North Texas region

b. *Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?*

The following figures show the demographics of the R/ECAPs of Dallas and the DFW region, including race, ethnicity, family type and national origin. Because HUD defines a R/ECAP as at least 50% nonwhite, R/ECAPs in both Dallas and the region remain predominantly black and Hispanic. However, while the definitional threshold requires 50% minority, R/ECAPs in Dallas and the region appear significantly minority-concentrated. On average, a Dallas R/ECAP has a 93.5% nonwhite population and a regional R/ECAP an 88.5% nonwhite population. These averages indicate not only nonwhite population concentration, by definition, but also nonwhite segregation.

Black residents account for a greater share of nonwhite R/ECAP population in Dallas (48%) than in an average regional R/ECAP (37%). The average regional R/ECAP has a greater Hispanic share (47%) because Hispanics typically form the core of the population within the R/ECAPs developing in the suburbs. While Hispanic households account for a lesser share than black households in R/ECAPs, they still represent a large share of the nonwhite population in an average Dallas R/ECAP (43%). In Dallas, the share of families in R/ECAPs (55.5%) is slightly lower than the regional average (56.7%)
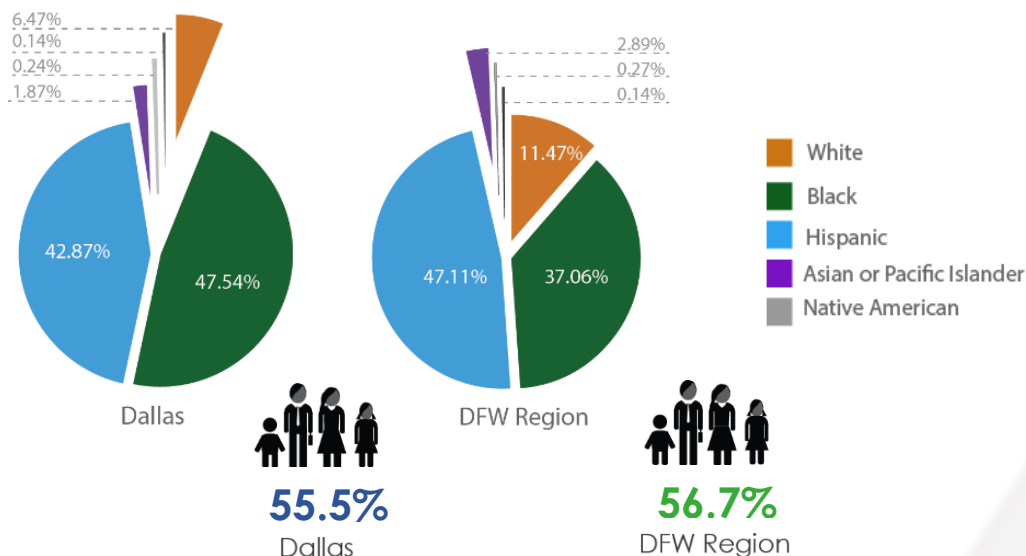
Figure 60: Racial/ethnic shares, family with children concentration in R/ECAPs, Dallas and DFW

Foreign-born individuals from Mexico represent around 20% of the foreign-born population in R/ECAPs in both Dallas and the region. Regionally, Hispanic and black residents account for over 84% of R/ECAP residents, but only 41% of the region's residents are Hispanic and black. Mexican immigrants represent over 20% of R/ECAP residents but less than 10% of the regional population. About 57% of the regional R/ECAP households have children as opposed to 51% of the overall regional households.
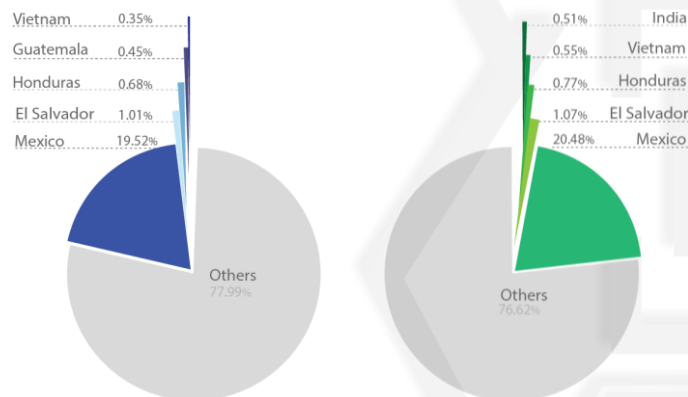
Figure 61: Foreign-born population proportion in R/ECAPs, Dallas and DFW region

c. *Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).*

Key Findings

The following maps shows the location of R/ECAPs in 1990, 2000, 2010, 2013, 2015 and 2016. A few key patterns emerge:

- Long-lasting R/ECAPs in south Dallas and west Dallas
- Proliferation of R/ECAPs over time

  - 1990: 18
  - 2000: 18
  - 2010: 32

  - 2013: 33
  - 2015: 32
  - 2016: 36

- Spatial dispersion of R/ECAPs across the City
- R/ECAPs tend to be characterized by not only extreme poverty but by racial segregation (highest segregation grades, nonwhite concentration above 90%)
- R/ECAPs tend to emerge as a result of poverty increase, as opposed to a nonwhite population increase

Overview

In 1990, 15 of the 18 R/ECAPs in Dallas appeared in southeast Dallas near Fair Park and the I-45 and SH 175 corridors. One isolated R/ECAP in Old East Dallas persists even though it briefly dropped out of R/ECAP status in 2010. Another isolated R/ECAP has existed for 25 years between Hampton and Westmoreland and north of I-30 in west Dallas. The final 1990 R/ECAP also persists in Oak Cliff north of the Dallas Zoo and near the Bishop Arts District even though it failed to meet the poverty requirement in 2000, 2010 and 2015. Two-thirds of the 18 R/ECAPs in 1990 persist in 2016 and only two of the six redesignated tracts (48113020300 and 48113020400) have poverty rates less than 35%, which means most remain at risk for R/ECAP classification.

In 2000, the R/ECAP distribution appeared remarkably similar to 1990 with 14 of the 18 R/ECAPs appearing in southeast Dallas (a few census tracts changed designation) while three new persistent R/ECAPs developed. The first north Dallas R/ECAP appeared near Richardson between Coit Road and US 75. Another persistent R/ECAP appeared east of Samuell Grand Park. Seventy-two percent of the R/ECAPs in 2000 persist 16 years later and only two of the redesignated tracts (48113020300 and 48113020400) have poverty rates less than 35%, which means most remain at risk for R/ECAP classification.

The 2010 census identified 17 new R/ECAPs throughout the City. While some of these remain (35%), many others have lost their R/ECAP designation as their poverty rate fluctuates. The improvements in many of these new R/ECAPs appear significant with the poverty rate exceeding 35% for only about 25% of the reclassified tracts, which indicates almost half of the new tracts appear at risk for R/ECAP classification in 2020.

In general, despite the relative waxing and waning and dispersion and concentration of R/ECAP clusters, over the years, south Dallas, east and central Oak Cliff, the Red Bird area and west Dallas consistently encompass the long-lasting R/ECAPs in the south, southwest and western sectors. In the City's east sector, Old East Dallas and far east Dallas have fewer but

also enduring R/ECAP areas, and to the north and northwest, far north Dallas (since 2000) and east Dallas (since 2010) have continuously included at least one R/ECAP.

The following table lists the census tracts that qualified as a R/ECAP at least once between the snapshot years 1990-2016. For each of these census tracts, the table lists the segregation level as well as the poverty and nonwhite concentration levels for 2015 and 2016. By 2015 and 2016, the 1990 census tracts closest to the CBD have lost their R/ECAP designation, but new emerging areas of concern seem to be appearing. In north Dallas, the Vickery Meadow area, two tracts in far northeast Dallas north of I-635 near Garland, another in far north Dallas and a final tract in northwest Dallas all have current R/ECAP designations. The Vickery Meadow area has persisted for the entire decade. In east Dallas, an area near Eastfield College appears at risk, and an area in Pleasant Grove has a R/ECAP that has persisted for the decade. The area near Kiest Park has a new R/ECAP emerging and the area between US 67, I-35E and DeSoto has numerous emerging R/ECAPS, especially near highways. These new R/ECAP locations emerge due to an increase in their poverty rates. Thus these tracts, already characterized by a high nonwhite concentration (and likely segregation), also experience an increase in poverty.

Legend
R/ECAP

☐ Yes

1990

2000

2010

2013
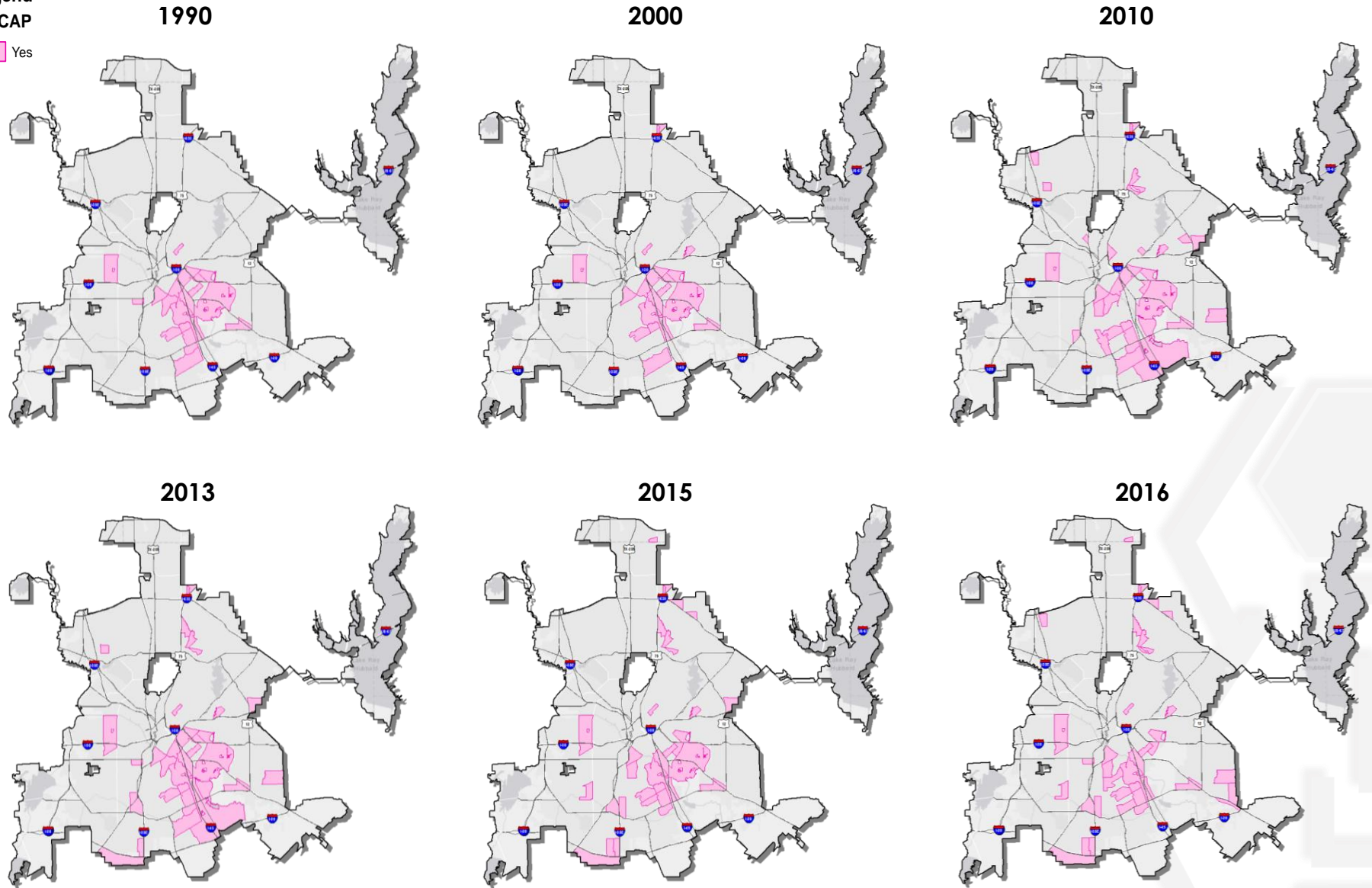
2015

2016

Figure 62: R/ECAPs patterns 1990-2016, Dallas

Table 27: R/ECAPs over time: change in poverty and nonwhite concentration, Dallas

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015	2016	2016
48113002701	1	1	1	1	1	1	6	6	58	100	55	99
48113004100	1	1	1	1	1	1	6	5	47	98	45	98
48113008604	1	1	1	1	1	1	6	6	53	98	55	98
48113008802	1	1	1	1	1	1	6	6	52	98	50	98
48113009304	1	1	1	1	1	1	6	6	64	98	57	98
48113020500	1	1	1	1	1	1	6	5	57	93	55	91
48113008603	1	1	0	1	1	1	5	6	52	99	51	100
48113004000	1	1	0	1	1	1	5	6	45	99	46	99
48113008701	1	0	1	1	1	1	5	6	50	99	44	99
48113019212	0	1	1	1	1	1	5	6	52	98	46	98
48113003800	1	1	0	1	1	1	5	5	41	97	41	97
48113011500	1	1	1	1	1	0	5	6	44	99	39	97
48113012208	0	1	1	1	1	1	5	5	43	95	42	95
48113001503	1	1	0	1	1	1	5	4	55	84	54	86
48113019213	0	1	1	1	1	1	5	3	48	77	45	79
48113011401	1	1	1	0	0		4	6	39	97	35	97
48113007820	0	0	1	1	1	1	4	4	48	83	46	90
48113020300	1	1	1	1	0	0	4	5	31	91	34	90
48113003400	1	1	1	1	0	0	4	4	34	88	26	88
48113007815	0	0	1	1	1	1	4	4	58	86	50	87
48113002702	1	1	0	1	0	0	3	6	37	98	36	99
48113004900	0	0	1	0	1	1	3	6	50	98	53	99
48113008900	1	0	1	1	0	0	3	6	40	98	39	97
48113003901	0	0	1	0	1	1	3	6	51	98	53	96
48113011105	0	0	0	1	1	1	3	5	47	96	40	96
48113012302	0	0	1	1	1	0	3	5	42	94	38	94

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015	2016	2016
48113006900	0	0	0	1	1	1	3	5	53	88	49	92
48113011800	0	0	1	1	0	1	3	5	36	94	46	91
48113016605	0	0	0	1	1	1	3	5	46	90	44	90
48113004700	1	0	0	1	0	1	3	5	39	89	41	89
48113006002	0	0	0	1	1	1	3	4	42	82	41	81
48113007823	0	0	0	1	1	1	3	3	48	76	41	77
48113011104	0	0	0	0	1	1	2	6	47	99	46	100
48113006001	0	0	1	1	0	0	2	6	33	99	31	99
48113020200	0	0	1	1	0	0	2	6	29	99	29	99
48113010804	0	0	0	0	1	1	2	5	43	96	46	97
48113005902	0	0	0	0	1	1	2	5	46	95	43	96
48113018503	0	0	0	0	1	1	2	5	42	90	42	93
48085031720	0	0	0	0	1	1	2	4	45	83	43	87
48113019016	0	0	0	0	1	1	2	3	47	74	40	75
48113009610	0	0	1	0	0	1	2	3	38	71	40	70
48113009804	0	0	1	1	0	0	2	3	39	74	39	67
48113008703	0	0	0	0	1	0	1	6	41	98	39	99
48113005500	0	0	0	0	0	1	1	6	38	98	41	98
48113008704	0	0	0	0	0	1	1	6	40	98	42	98
48113001204	0	0	1	0	0	0	1	5	19	97	17	95
48113005700	0	0	1	0	0	0	1	6	40	98	36	95
48113011702	0	0	0	0	0	1	1	5	37	91	42	92
48113007818	0	0	0	0	0	1	1	5	38	90	40	90
48113000405	0	0	1	0	0	0	1	4	30	80	29	81
48113012210	0	0	1	0	0	0	1	4	34	77	31	81
48113007819	0	0	1	0	0	0	1	3	30	74	27	80

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015	2016	2016
48113001600	0	0	1	0	0	0	1	1	31	60	29	57
48113014204	0	0	1	0	0	0	1	1	37	54	43	46

R/ECAP: 1(Yes)/ 0 (No)

Segregation Grade (2015)

Nonwhite share 30% to 40% greater than jurisdiction: **6**   Nonwhite share 0% to 10% greater than jurisdiction: **3**
Nonwhite share 20% to 30% greater than jurisdiction: **5**   Nonwhite share similar to jurisdiction's share: **2**
Nonwhite share 10% to 20% greater than jurisdiction: **4**   Greater White population share than jurisdiction: **1**

Change in R/ECAP over the years

The following map shows in pink the census tracts that have been designated as a R/ECAP at least once during 1990, 2000, 2010, 2013, 2015 and 2016. These census tracts are also labeled based on the number of years for which they have been a R/ECAP.
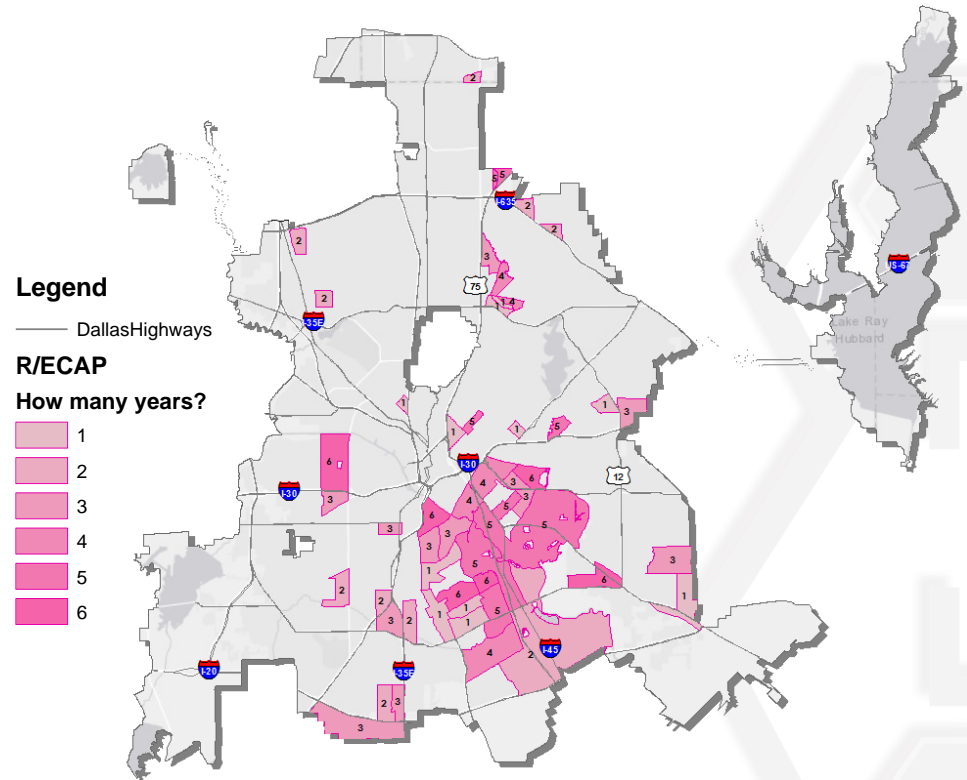
Figure 63: R/ECAPs presence over time

Case study: **Bonton and Ideal Neighborhoods: From R/ECAP to Non-R/ECAP**

While many persistent R/ECAPs occur from 1990-2016, the Bonton Neighborhood successfully lost its R/ECAP designation in 2016 after 25 years. Indeed, the neighborhood (primarily census tract 115.00) registered a decline in poverty of 5 percentage points and hence effectively shifted from being a R/ECAP for at least 25 years, to not being designated as one as of 2016. While it remains at risk, this represents a significant accomplishment.

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015	2016	2016
48113011500	1	1	1	1	1	0	5	6	44	99	39	97

Figure 64: Bonton R/ECAP revitalization

Considerable efforts and resources were dedicated to revitalize the area. Indeed, in an effort to holistically revitalize the area, the City of Dallas invested **$31,568,454** between 2003 and 2012 in the area. City-led initiatives sought to address the presence of blighted structures, the lack of adequate transportation, the lack of access to public facilities, the presence of crime and the lack employment opportunities. In conjunction with these efforts, the Dallas Housing Authority demolished 650 public housing units and redeveloped Buckeye Trail Commons Buckeye Trail Commons and Buckeye Trail Commons II (total development cost of approximately **$51 million**). The efforts to revitalize the area include a wide range of entities, which include grassroots and community-based organizations *(see City of Dallas South Dallas Ideal/Rochester Park Community Revitalization Plan, 2012)*.

Table 28: List of projects and funding amount and sources to revitalize South Dallas Ideal/Rochester Park Neighborhood (source: NIP, Dallas)

South Dallas Ideal/Rochester Park NIP/CRP Funding Plan (2003-Present)

QAP ELEMENT ADDRESSED *	Allocation	Funding Source	Use of Funds	Status
Presence of blighted structures				
Projects				
> Land bank Program activities	631,750	Bond	Land acquisition	Ongoing
> Housing + mixed-use developments	6,055,000	Bond, HOME, CDBG, HFC	Development Asst.	Funding Expended/Project Completed
> Housing + mixed-use developments	1,914,326	CDBG	Land acquisition	Funding Expended/Project Completed
> DHA Buckeye Trail Commons (Turner Courts)	2,500,000	Bond	Infrastructure	Underway
Presence of inadequate transportation				
Projects				
> Bexar Phase I infrastructure/streetscape improvements	2,901,652	CDBG	Construction	Funding Expended/Project Completed
> Bexar Phase II infrastructure/streetscape improvements	8,012,297	Bond, CDBG	Construction	Under construction
> Bexar Phase III infrastructure/streetscape improvements	1,651,204	Bond, CDBG	Construction	Under construction
> Neighborhood street improvements	3,597,876	CDBG	Construction	Funding Expended/Project Completed
Lack of access to public facilities				
Projects				
Presence of significant crime				
Projects				
> Community Prosecution Progam (CPP)	--	Gen. Fund, JAG, CDBG	CPP activities	Ongoing
> Dallas Police Department Satellite Station	2,700,000	Cert. of Obligation, Bond, CDBG	Construction + Public improvements	Construction start Winter 2013
Lack of access to businesses providing employment opportunities				
Projects				
> Bexar Employment/Training Campus	190,000	Bond	Land acquisition	Ongoing
> Bexar Employment/Training Campus Area	782,882	CDGB, Bond	Public improvements	Construction start Spring 2013
Miscellaneous				
Projects				
> Neighborhood Enhancement Program activities	451,467	CDBG	Landscaping-beautification-public art	Funding Expended/ Project Completed
> Busienss Incentive Program	180,000	CDBG	Working capital + Façade improvements	Funding committed / Program implementation underway
Total CRP Investment	$31,568,454			
* Note: Projects may address more than one QAP Element				

R/ECAP Patterns in North Texas

For the region from 1990 to 2015, R/ECAP areas primarily appeared in Dallas and Tarrant County (Figure 65-Figure 68). During this time period, many R/ECAPs have persisted in Dallas County near Fair Park and south Dallas near I-45 and US 175; in Tarrant County, southeast Fort Worth contains R/ECAPs from downtown to I-820. The exact census tracts designated as R/ECAPs during this period may fluctuate but poverty and segregation remain continuously present; furthermore, the R/ECAPs in southeast Fort Worth increased and expanded. In west Dallas, another isolated R/ECAP has existed for 25 years near Fish Trap Park and Rupert Park between the Trinity River and Fort Worth Avenue. In suburban Tarrant County, one R/ECAP has existed in Arlington near I-30 since 1990.

In 1990, R/ECAPs also occur just north of I-30 in Greenville. The Hunt County seat experiences fluctuations in the designation of its census tracts as R/ECAPs over the 25-year study period. In 2000, R/ECAPs disappear in Greenville (Figure 65), but in 2010 they reappear. In 2015, the Greenville R/ECAP disappears again, but R/ECAPs persist in Hunt County by appearing in Commerce.

In addition to these long-existing R/ECAPs, many Dallas R/ECAPs have appeared and persisted in other locations. In 2000, the first R/ECAP in north Dallas near Richardson north of I-635 and adjacent to US 75 developed. Since 2000, two new clusters in east Dallas have persisted: north of I-30 and east of Samuell Grand Park and near the US 175 and Loop 12 interchange. In 2010, the west Dallas R/ECAP experienced a small expansion; another cluster appeared in north Dallas east of US 75 between I-635 and Loop 12, and many other clusters developed near freeway interchanges in south and east Dallas: 1) I-35E and US 67, 2) I-35E and SH 180, and 3) Loop 12 and I-30. In 2015, a new R/ECAP cluster emerges in Oak Cliff and another develops north of I-635 and east of US 75 near Garland.

Fort Worth experienced more fluctuations in R/ECAP location from 1990 to 2015. In 2000 (Figure 65), a R/ECAP first appears in the Lake Como area; the Como area does not appear as a R/ECAP in 2010, but the designation reappears in 2013 and 2015. Since 2010, an area north of SH 183 and south of I-820 near both I-35W and US 287 has experienced fluctuating designations; in 2015, an area between I-35W and US 287 along SH 183 persists. Since 2010, a R/ECAP has existed in an area near Texas Christian University, and in 2013, a R/ECAP developed in the area around the Naval Air Station.

Since 2010, more R/ECAPs have begun to appear in Dallas and Tarrant County suburbs. While some R/ECAPs existed in Irving in 2010 and 2013, they do not appear in 2015. At the same time, a R/ECAP appeared in Carrolton near I-35E and another appeared in north Desoto. In Garland, a R/ECAP developed in 2013 and expanded in 2015. Since 2010, the Tarrant County R/ECAPs have expanded to include central Arlington and west Grand Prairie near SH 360.

Outside Dallas and Tarrant counties, four other counties contain R/ECAPs. R/ECAPs have persisted in south Denton, the Denton County seat, since 2000. Hunt County has experienced fluctuations in its designated R/ECAPs since 1990, but in 2015, a new R/ECAP appeared in Commerce. In 2015, the first R/ECAP in Collin County appeared in Dallas near SH 190, and in Ellis County, its first R/ECAP appeared in Ennis. While the R/ECAPs in the region primarily occur in Dallas and Tarrant County, they have increased in number and spatial breadth from 1990-2015.

Figure 65: R/ECAPs 1990 and 2000, North Texas region

Figure 67: R/ECAPS 2010 and 2013, North Texas region

Legend

— Region_Highways

☐ Greenville_City_Limit

☐ FortWorth_City_Limit

☐ Dallas_City_Limit

☐ McKinney_City_Limit

☐ No

☐ Yes
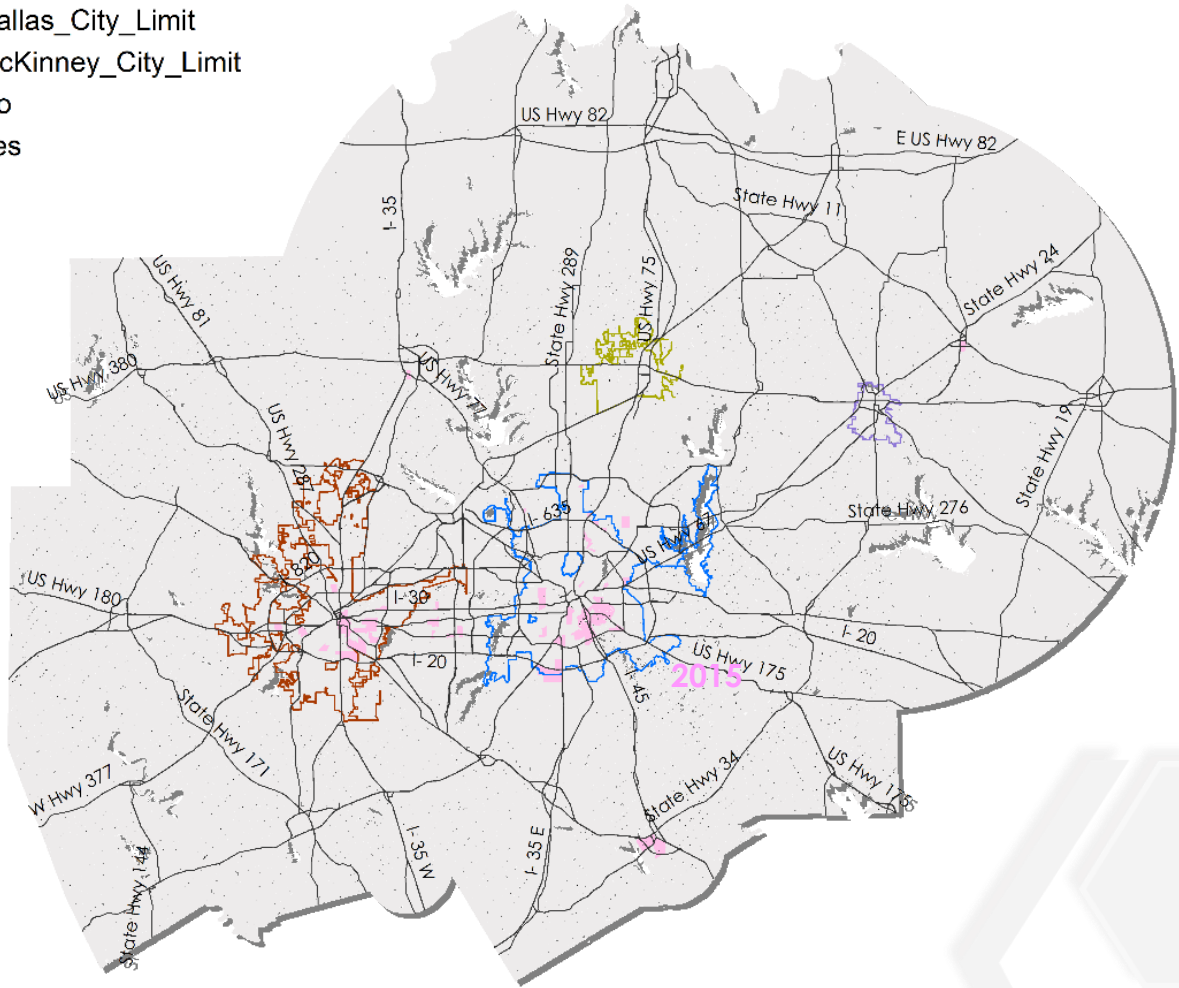
Figure 68: R/ECAPs 2013 and 2015, North Texas region

a. *Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.*

Single female-led families with children

The Fair Housing Act prohibits discrimination in housing based on familial status. In other words, with some exceptions, it prohibits discrimination against families with children under the age of 18. Research has shown that single mothers are particularly at risk of poverty and housing problems.

The following maps display the number of households in each Dallas census tract headed by a single mother with children under age 6 (ACS, 2015). This information is overlaid with census tracts, delineated in black, that are designated as R/ECAPs (pink).

While not all census tracts with a relatively high number of single-female-led families are R/ECAPs, most R/ECAP census tracts account for a relatively high number of single-female-led families (between 76 and 222).

Legend

R/ECAP 2016

Yes
No

Single mothers with children under 6 Count

0 - 16
17 - 43
44 - 75
76 - 122
123 - 222
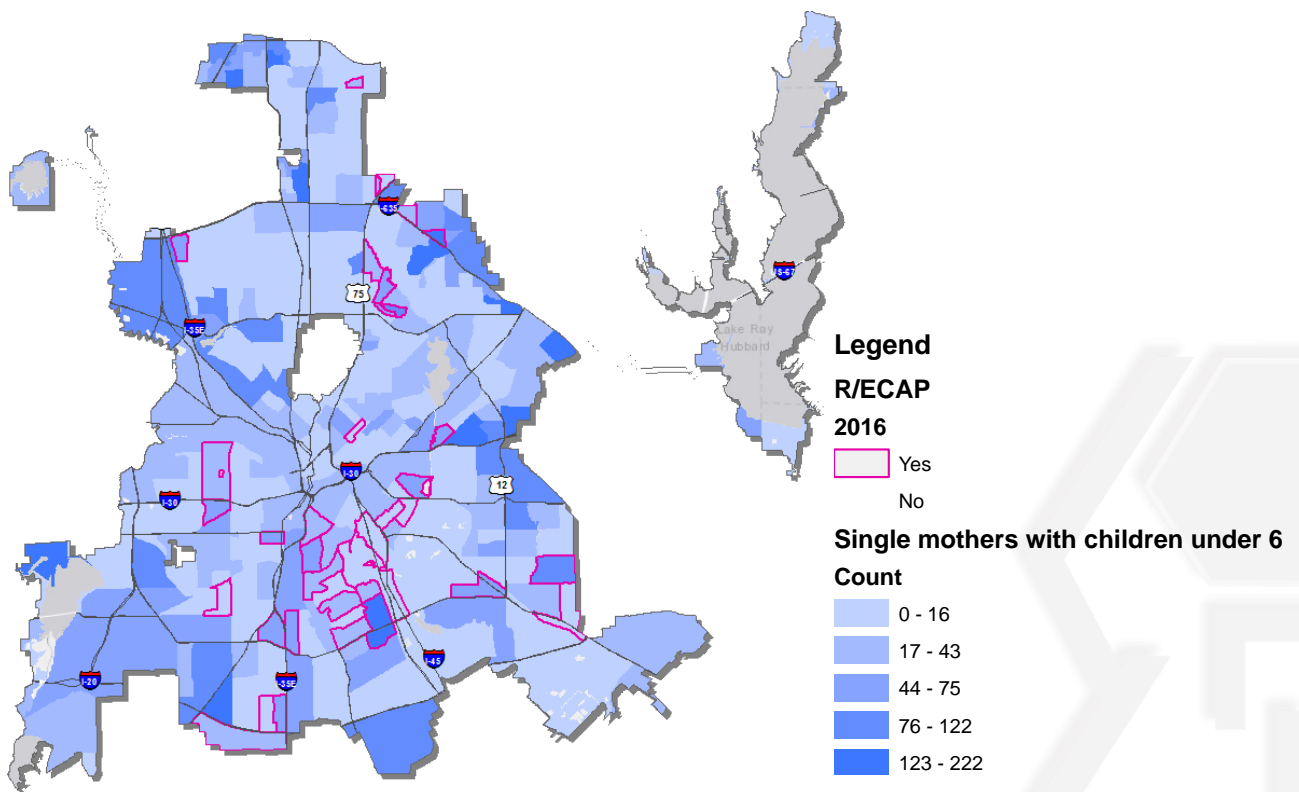
Figure 69: Single female-headed families with children and R/ECAPs, Dallas

Patterns of segregation and R/ECAPs

A census tract is designated as a R/ECAP if it meets the racial/ethnic and poverty concentration thresholds set by HUD (50% nonwhite population and poverty rate 40%). For the purpose of this assessment of fair housing, it is critical to bring nuance to the concepts of **concentration** and **segregation** and shed light on the compounding barriers faced by residents of specific neighborhoods in Dallas.

R/ECAP census tracts in the City of Dallas not only are characterized by an "extreme poverty" level (Wilson, 1980; HUD, 2017), but also by the most severe degrees of racial/ethnic segregation found in the City (darkest shades of green).

Most of the R/ECAPs is Dallas have a share of nonwhite residents that is 30%-40% greater than the City average.
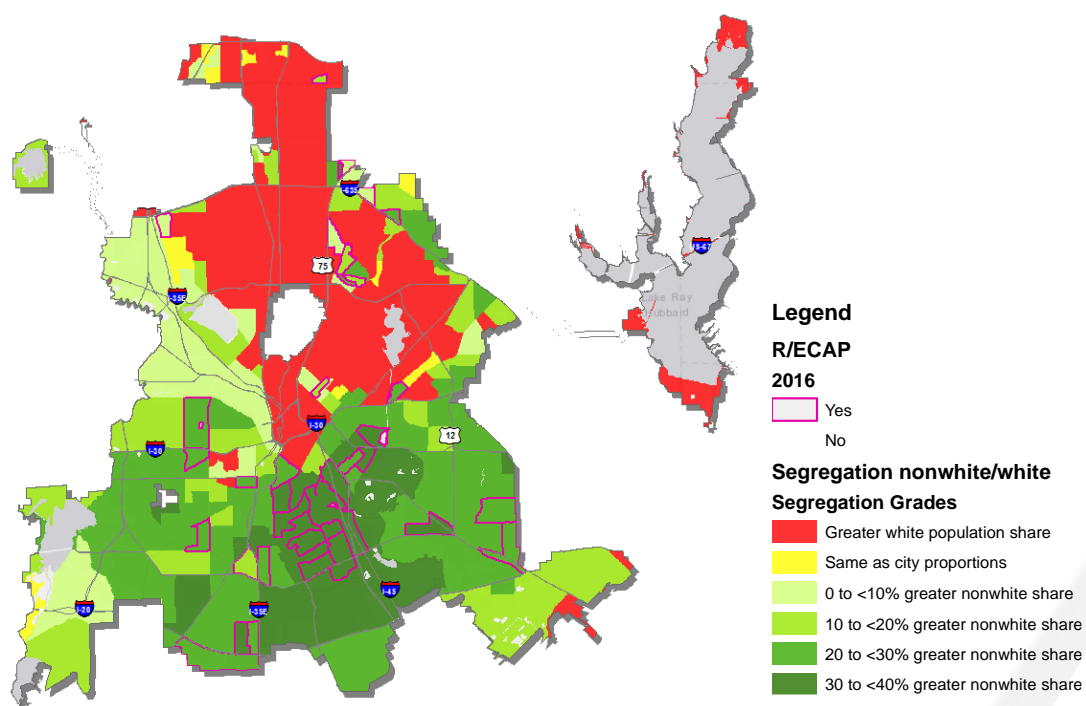
Figure 70: Segregation patterns and R/ECAPs, Dallas

Housing Choice Voucher Families and R/ECAPs

Housing Choice Voucher (HCV) families tend to be disproportionately in protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. Therefore, examining the residential patterns of HCV families with respect to R/ECAPs is particularly relevant for assessing fair housing issues.

Local data was collected from the participating jurisdictions in the North Texas Regional Housing Assessment regarding the residential patterns of HCV families. A total of 27,743 HCV families were located across the North Texas region. The City of Dallas is home to 10,531 HCV families.

As of 2016, Dallas had 36 R/ECAP census tracts. An estimated 3,000, or 28%, of the HCV families residing in Dallas were located in R/ECAPs. The number of HCV families in R/ECAP tracts ranged from 1 to 286, with an average of 83 families. The average number of HCV families in non-R/ECAP, HCV-populated census tracts, is 22. In sum, the concentration of HCV families is disproportionately greater in R/ECAP as opposed to non-R/ECAP census tracts.

Summary key facts:

- Of the 380 census tracts in Dallas, 36 are R/ECAP
- Thirty-six R/ECAP census tracts were home to 28% of all HCV families in Dallas, as of 2016
- The average number of HCV families is disproportionately greater in R/ECAPs (83 families) than in non-R/ECAPs (22 families) and in non-R/ECAPs with at least one HCV family (39 families).
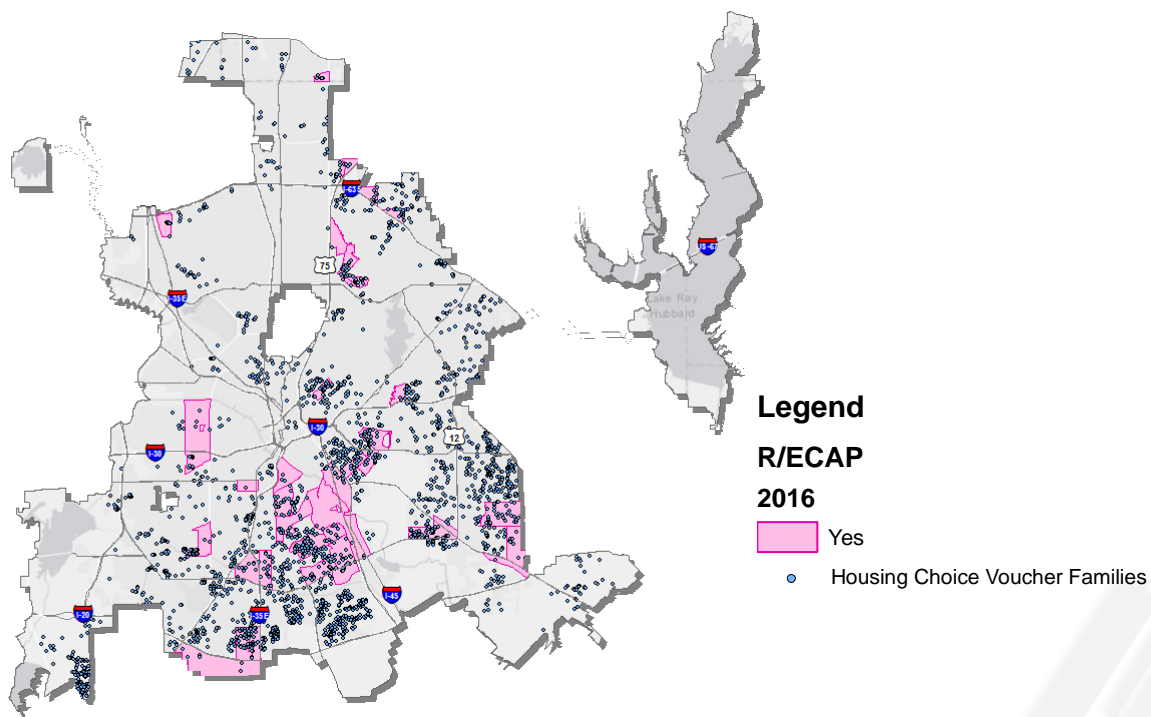
Figure 71: HCV residential patterns and R/ECAPs, Dallas

Supportive Housing for the Elderly (Section 202) and for Persons with Disabilities (Section 811), Project Based Section 8

The Fair Housing Act prohibits discrimination on the basis of race, color, national origin, religion, sex, familial status and **disability**. While age is not explicitly designated as a protected class concern (familial status aside), disabilities tend to be more predominant among older individuals. It is important to note that the Age Discrimination Act of 1975 and HUD's implementing regulations (24 CFR Part 146) prohibit age discrimination in the provision of programs receiving federal financial assistance. Within this context, the following section examines the residential patterns of HUD-subsidized households with a disability that are participating in Supportive Housing for the Elderly (Section 202), in Persons with Disabilities (Section 811) and in project-based voucher programs.

Figure 72 the locational characteristics and residents-related information for Section 202 and Section 811 housing developments in Dallas.
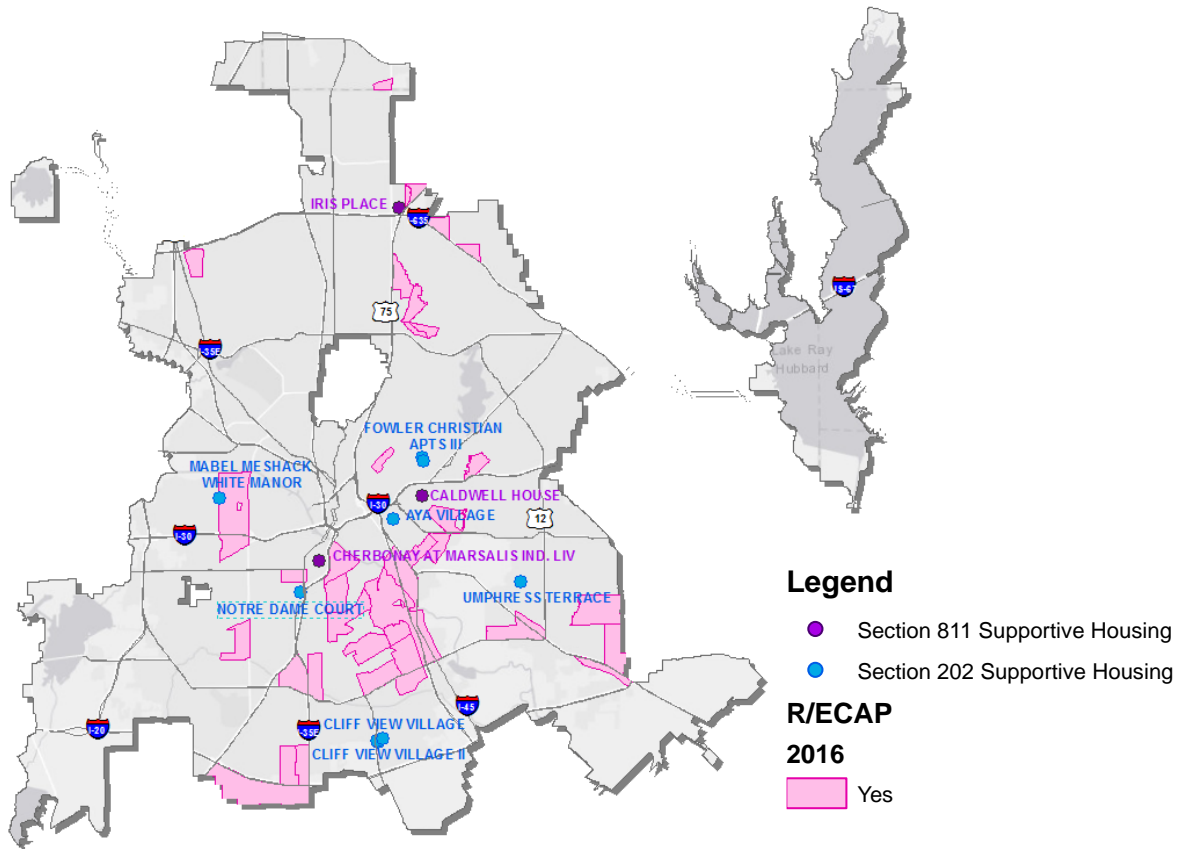
Figure 72: Sections 202 and 811 supportive housing developments and R/ECAPs, Dallas

Nine supportive housing for the elderly (Section 202) and three for persons with disabilities (Section 811) exist within the city of Dallas. Mabel Meshack White Manor (Section 202), which has the second largest number of subsidized units, is located within a R/ECAP census tract that has a poverty rate substantially above the "extreme poverty threshold" of 40%. While all other properties are located outside of R/ECAP census tracts, eight of the 11 supportive housing developments are located in census tracts with a poverty rate above 20%.

Fowler Christian Apartments II and III, which contain the highest proportions of HUD-assisted households with a disability (respectively 18% and 11%) among 202 supportive housing developments, are located in the census tract with the lowest poverty rate and nonwhite concentration. Distinctively, these two developments also account for a significantly lower share of extremely low-income households compared to other 202 supportive housing developments.

Overall, the majority of the Section 202 and 811 housing developments are located in south Dallas, yet most of them are located outside R/ECAP census tracts.

Table 29: Sections 202 and 811 supportive housing development characteristics: R/ECAP, poverty rate, nonwhite concentration

Program	Name	Number Subsidized units	Percent VLI	Percent ELI	Percent assisted HHWD	R/ECAP 2016	Percent Nonwhite	Poverty Rate	Segregation Grade	GS Focus Area	Neighborhood Plus Focus Area
202_PRAC	CLIFF VIEW VILLAGE	28	100	**86**	0	0	**91**	20	**6**	Education Corridor	Bonnie View
202_PRAC	MABEL MESHACK WHITE MANOR	65	100	**92**	3	**1**	**78**	**55**	5	West Dallas Gateway	N/A
202_PRAC	AYA VILLAGE	29	100	**89**	7	0	**84**	34	5	DART Green Line	N/A
202_PRAC	CLIFF VIEW VILLAGE II	27	100	**88**	0	0	**85**	35	**6**	Education Corridor	Bonnie View
202_PRAC	FOWLER CHRISTIAN APARTMENTS II	20	95	57	18	0	10	11	1	N/A	N/A
202_PRAC	CLIFF VIEW VILLAGE III	27	100	**88**	0	0	**91**	20	**6**	Education Corridor	Bonnie View
202_PRAC	UMPHRESS TERRACE	53	98	**83**	2	0	27	24	5	DART Green Line	N/A
202_PRAC	NOTRE DAME COURT	68	100	**93**	1	0	20	24	5	Bishop Arts Village	N/A
202_PRAC	FOWLER CHRISTIAN APTS III	36	100	59	11	0	10	11	1	N/A	N/A
811_PRAC	IRIS PLACE	18	100	**89**	100	0	**79**	29	5	N/A	Spring Valley/ Coit
811_PRAC	CALDWELL HOUSE	6	Null	Null	Null	0	35	39	5	N/A	N/A
811_PRAC	CHERBONAY AT MARSALIS IND. LIV	11	Null	Null	Null	0	31	21	4	Bishop Arts Village	The Bottom
	TOTAL	388				1					

PRAC: Project Rental Assistance Contract
VLI: Very Low-Income
ELI: Extremely Low-Income
HHWD: Households with a disability
R/ECAP: 1(Yes)/ 0 (No)
GS Focus Area: GrowSouth Focus Area
N/A: Not Applicable
Null: Missing Value

Segregation Grade (2015)
Nonwhite share 30% to 40% greater than jurisdiction: **6**
Nonwhite share 20% to 30% greater than jurisdiction: **5**
Nonwhite share 10% to 20% greater than jurisdiction: **4**
Nonwhite share 0% to 10% greater than jurisdiction: **3**
Nonwhite share similar to jurisdiction's share: **2**
Greater white population share than jurisdiction

Table 30: Project-based Section 8 development characteristics: R/ECAP, poverty rate, nonwhite concentration

Program label	Name	Subsidized units available	Percent VLI	Percent ELI	Percent assisted HHWD	Segregation Grade	R/ECAP (2016)	Percent Nonwhite (2016)	Poverty Rate (2016)	GS FOCUS AREA	Neighborhood Plus Focus Area
Project Based Section 8	CASA TREVINO	85	100	85	14	3	0	70	21	<Null>	<Null>
Project Based Section 8	CATHEDRAL GARDENS	23	100	73	27	4	1	86	54	<Null>	<Null>
Project Based Section 8	CHEROKEE VILLAGE	61	100	89	12	6	1	98	57	DART Green Line	Pemberton Hill
Project Based Section 8	COLONIA TEPEYAC	280	98	85	12	4	0	82	37	<Null>	<Null>
Project Based Section 8	DICKINSON PLACE	116	100	96	4	1	0	42	30	<Null>	<Null>
Project Based Section 8	ESTELLE VILLAGE	288	100	90	11	6	0	97	35	Education Corridor	Bonnie View
Project Based Section 8	SILVER GARDENS FKA ECHAD	200	99	87	9	4	0	80	35	<Null>	Casa View
Project Based Section 8	FOREST GREEN MANOR	251	99	91	71	1	0	45	12	<Null>	<Null>
Project Based Section 8	FOWLER CHRISTIAN	144	99	59	30	1	0	29	11	<Null>	<Null>
Project Based Section 8	FRIENDSHIP TOWERS I	150	99	89	59	5	0	94	20	N/A	N/A
Project Based Section 8	GREATER BETHLEHEM PLAZA	30	100	90	27	4	0	89	35	N/A	Skyline Place APts CRP
Project Based Section 8	TRINITY APARTMENTS	143	100	84	10	6	1	98	57	DART Green Line	Pemberton Hill
Project Based Section 8	MIRASOL FKA LAKE JUNE	100	99	83	10	5	1	91	46	N/A	N/A

Project Based Section 8	LAKELAND MANOR	171	99	93	**80**	4	0	81	31	N/A	N/A
Project Based Section 8	NORTHGATE VILLAGE	167	99	68	1	4	0	84	32	N/A	Family Corridor
Project Based Section 8	PLEASANT VILLAGE APARTMENTS AKA CRE	130	100	96	9	5	0	98	31	DART Green Line	Pemberton Hill
Project Based Section 8	PRAIRIE CREEK VILLAGE APARTMENTS	118	100	85	5	5	0	91	29	N/A	Pleasant Grove
Project Based Section 8	PYTHIAN MANOR	75	100	88	9	6	0	99	28	Lancaster Corridor	N/A
Project Based Section 8	RIDGECREST TERRACE APARTMENTS	246	99	93	8	5	0	94	28	N/A	Arcadia Park
Project Based Section 8	SHILOH VILLAGE APARTMENTS	167	96	77	1	5	0	94	38	N/A	N/A
Project Based Section 8	PARKS AT WYNNEWOOD APARTMENTS	116	99	81	4	5	0	91	32	N/A	N/A
Project Based Section 8	BENNETT PLAZA	48	100	96	8	1	0	56	29	N/A	N/A
Project Based Section 8	ROYAL CREST	165	100	90	3	6	**1**	99	**44**	Education Corridor	N/A
Project Based Section 8	ST. JAMES MANOR APARTMENTS	149	99	94	7	6	**1**	98	**50**	Lancaster Corridor	N/A
Project Based Section 8	HIGH POINT SENIOR LIVING - A	11	100	82	**100**	5	0	91	32	N/A	N/A

Figure 73: Project-based Section 8 developments in R/ECAPs, Dallas

Among the 25 project-based Section 8 developments in Dallas, six are located within a R/ECAP census tract and five have a share of households with a disability of at least 30%.

For the developments located in R/ECAP census tracts, the poverty rate ranges from 44% to 57%, and the concentration of nonwhite households varies from 62% to 97%. In sum, these R/ECAP census tracts present a level of poverty and minority concentration significantly higher than the qualifying R/ECAP thresholds (50% nonwhite and poverty rate of 40%).

None of the four project-based Section 8 developments with a 30% or greater share of households with a disability is located within a R/ECAP census tract. For these developments, the poverty rate does not exceed 32% and the nonwhite concentration ranges from 10% to 67%.

b. *The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.*

Neighborhood Plus Plan and R/ECAPs

In 2015, Dallas adopted its Neighborhood Revitalization Plan, which focuses on alleviating poverty, fighting blight and enhancing rental options. The plan identifies 13 Neighborhood Plan (NP) focus areas (Table 32). As noted in the preceding section, the Neighborhood Action Plans for the NP focus areas appear to be primarily about community engagement and participatory planning. The following maps show the overlap between the areas targeted for revitalization under Neighborhood Plus and R/ECAP census tracts in 2015 and 2016.

While one of the core intents of the Neighborhood Plus Plan is to combat poverty through revitalization, little overlap exists between the designated NP focus areas and areas of high poverty and minority concentration (R/ECAPs). More precisely, in 2015, seven of the 32 existing R/ECAP census tracts were at least partially contained `an NP focus area (Table 31). As of 2016, six out of the 36 existing R/ECAPs overlapped with NP focus areas.

Table 31: Neighborhood Plus focus areas: poverty rate, nonwhite concentration and R/ECAP overlap

Neighborhood Plus Focus Areas Overlapping with R/ECAPs	Number of R/ECAPs at least partially within NP areas in 2015	Number of R/ECAPs at least partially within NP areas in 2016	Average Poverty Rate (2016)	Average Nonwhite concentration (2016)
The Bottom	1		26%	85%
Vickery Meadow	2	2	33%	71%
Pemberton Hills	1	1	**41%**	**97%**
Family Corridor	1	1	24%	70%
Coit/Spring Valley	2	2	30%	82%
Elm Thicket-Northpark			9%	53%
Bonnie View			27%	98%
Kiest Cliff/Kimball Heights			28%	91%
Red Bird			28%	94%
Casa View			20%	74%
Skyline			28%	80%
Arcadia Park			27%	94%
Pleasant Grove			24%	89%
Total	**7 (out of 32)**	**6 (out of 36)**	**26%**	**80%**

Overall, not all NP focus areas encompass the same level of poverty and minority concentration. Both a high poverty rate and a high level of nonwhite population concentration characterize the Pemberton Hills focus area. The Vickery Meadow and Coit/Spring Valley NP focus areas also show a relatively high poverty rate and high concentration of nonwhite population. On the other hand, the Elm Thicket-Northpark NP focus area reveals a significantly lower poverty rate (9%) than the other NP focus areas. Similarly, the Casa View focus area has a relatively low poverty rate of 20%.

This preliminary overview of designated revitalization focus areas related to R/ECAPs and their overarching poverty and minority-concentration patterns suggests the need for a re-evaluation of targeted areas for revitalization to best capture R/ECAPs and other poverty-concentrated areas in the City.
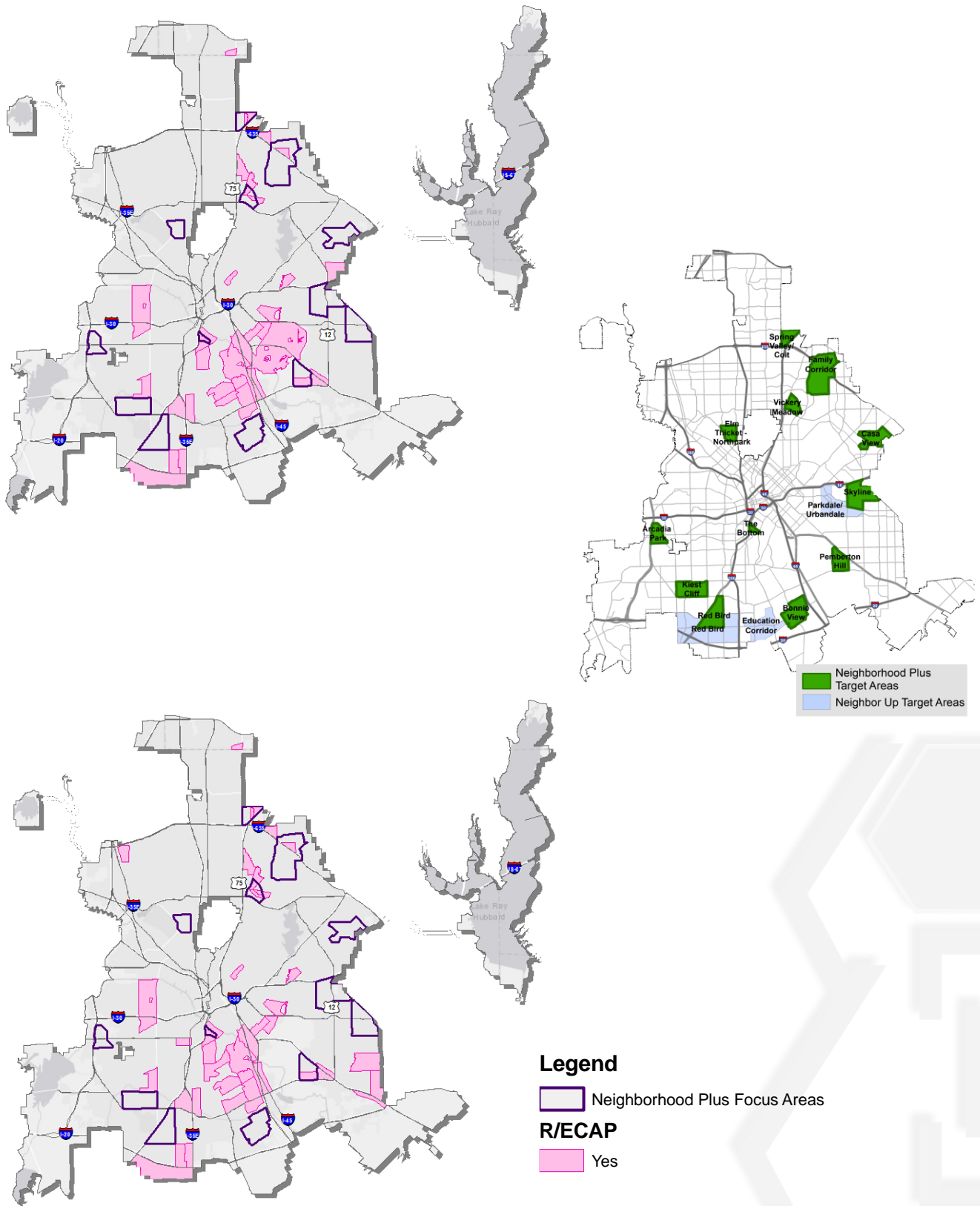
Figure 74: Neighborhood Plus focus areas: overlap R/ECAP 2015 (top) and 2016 (bottom)

Market Value Analysis and R/ECAPs

In 2018, Reinvestment Fund (RF) conducted a Market Value Analysis (MVA) for the City of Dallas. Its matrix identified nine market types (A through I) on a spectrum of residential market strength and weakness. The market classification is based on various indicators, including median home sales prices, variation in sales prices, percent owner-occupied, percent new construction, percent rehabilitation, percent public subsidy, percent code violations, percent of vacant homes, percent foreclosure filings and household density.

The following maps superimpose 2015 R/ECAPs on maps depicting (1) the different real estate market types; (2) market strength; (3) median home sales prices; and (4) the percent of code violations at the block group level.

The MVA shows that mostly distressed and a few middle real estate markets characterize R/ECAP areas. The median home sales price is significantly lower in R/ECAPs, although reflective of an overall pattern for south Dallas. Similarly, R/ECAPs in north Oak cliff, east Oak Cliff, Fair Park and south Dallas evince higher rates of homes with code violation liens. In sum, a typical R/ECAP census tract in Dallas is not only characterized by the vulnerability of its residents (racial/ethnic and poverty concentration), but also by the relative acute weakness and distress level of its real estate market.

Because of the level of granular information analyzed and produced, the MVA constitutes a critical tool to direct revitalization efforts and real estate investments to targeted R/ECAPs and weaker real estate markets.

Overview Market Value Analysis Results
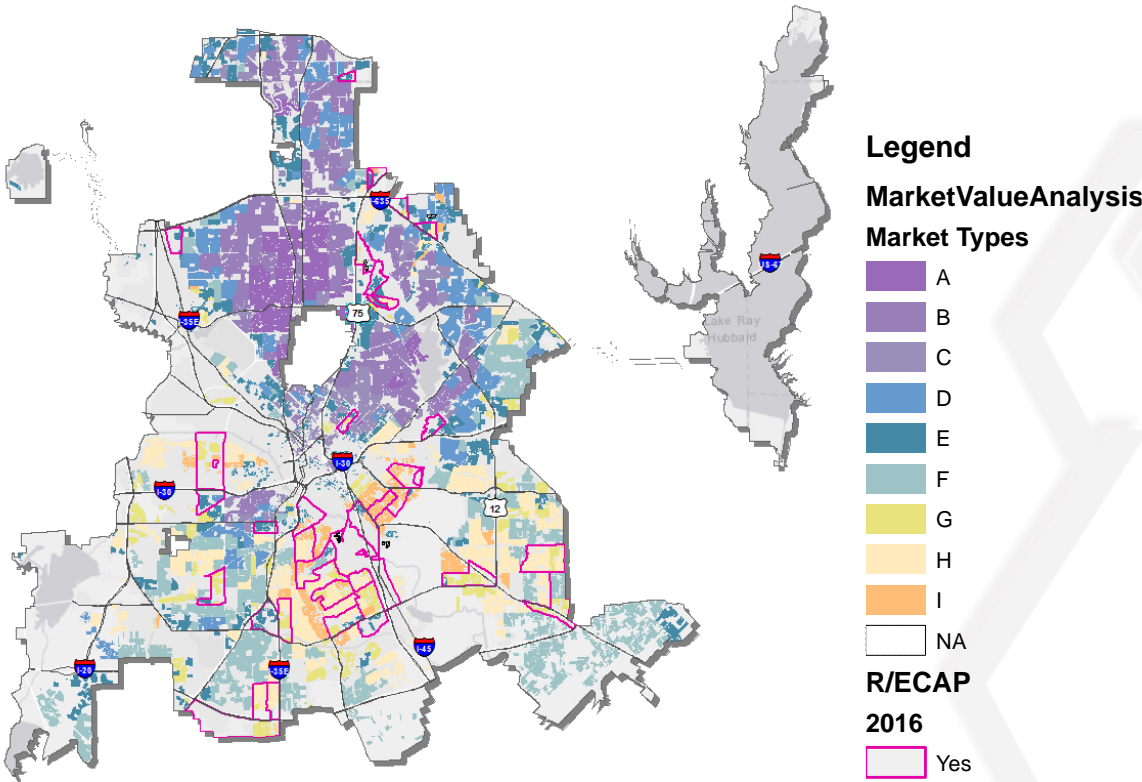
Figure 75: Dallas Market Value Analysis results (Source: RF, 2018) and R/ECAP overlap

Legend

Combined_Markets_MVA

mvacluster

- Strong Markets (A,B,C)
- Middle Markets (D, E, F)
- Distressed Markets (G, H, I)
- NA

R/ECAP

2016

- Yes
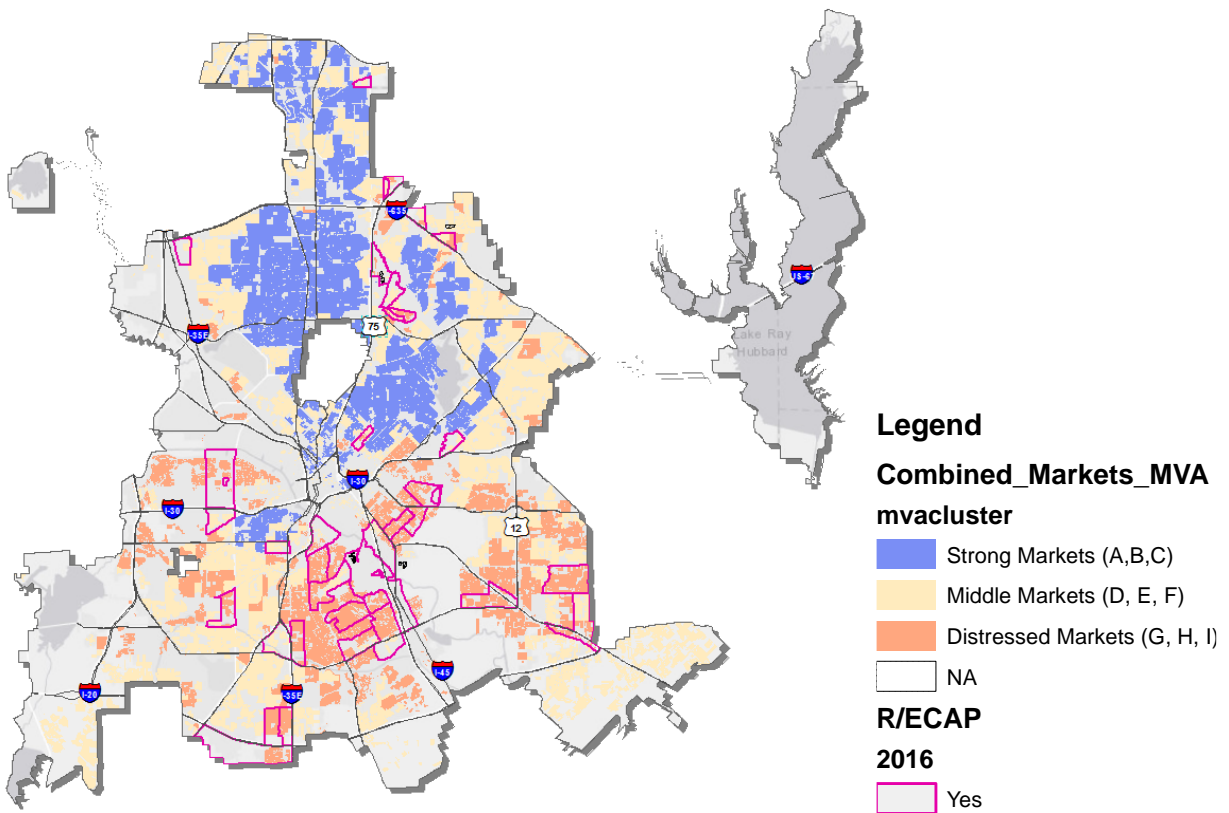
Figure 76: Dallas Market Value Analysis results: grouped market classification (Source: RF, 2018)

Legend

R/ECAP

2016

- Yes
- No

Median Sales Price

- $0.00 - $145,000
- $145,000.01 - $279,500
- $279,500.01 - $470,000
- $470,000.01 - $946,000
- $946,000.01 - $2,897,000
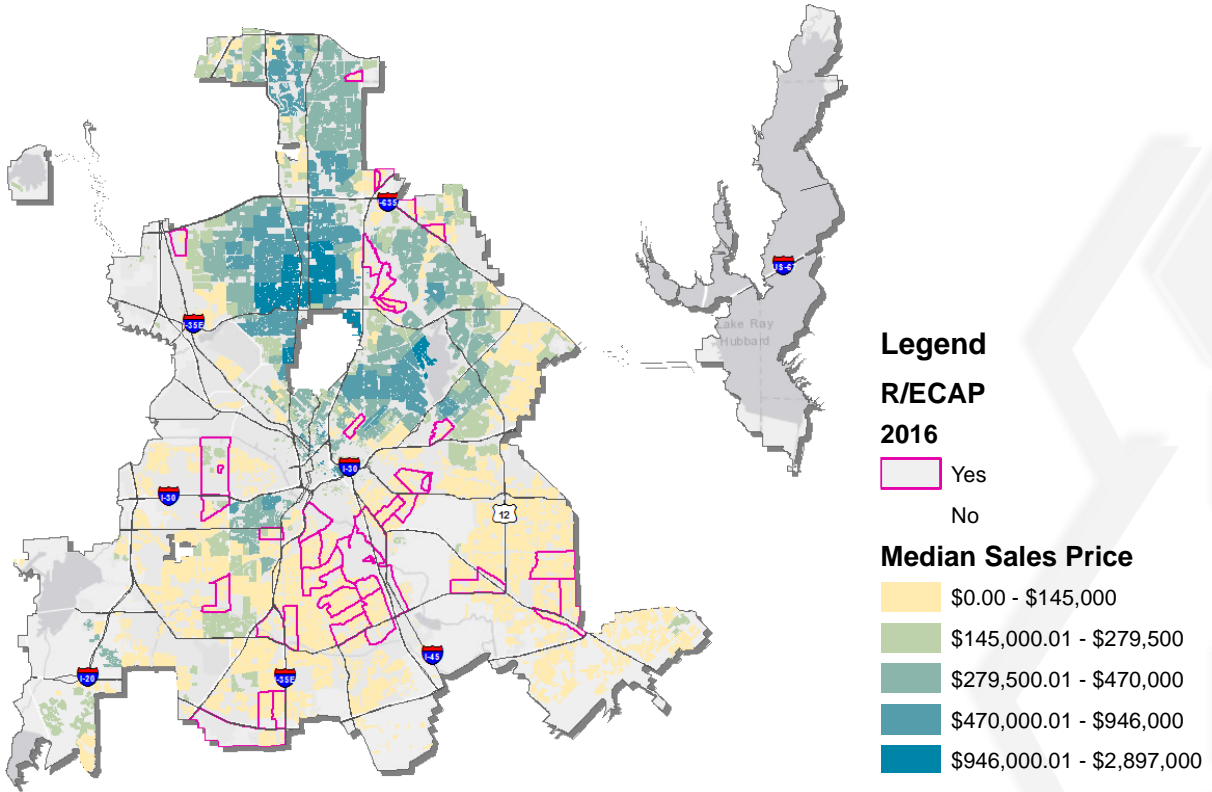
Figure 77: Median home sales prices (Source: RF, 2018)
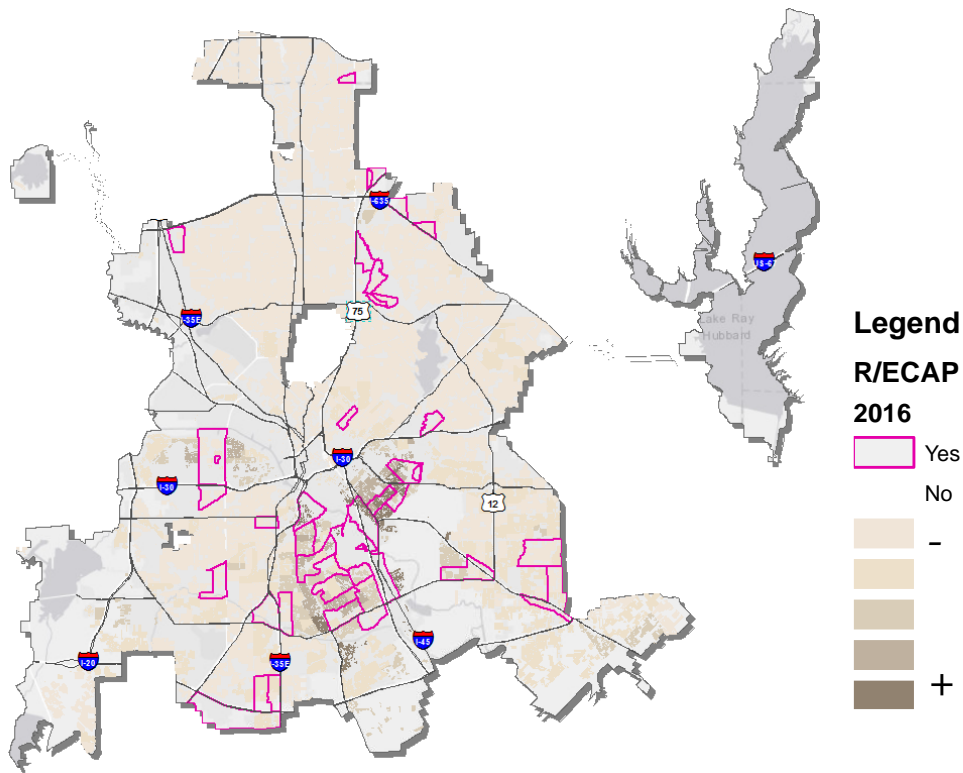
Figure 78: Percent code violation (Source: RF, 2018)

Based on the results of the Market Value Analysis, the newly adopted housing policy proposes a geographic prioritization among three reinvestment areas: Redevelopment Areas; Stabilization Areas; and Emerging Market Areas.
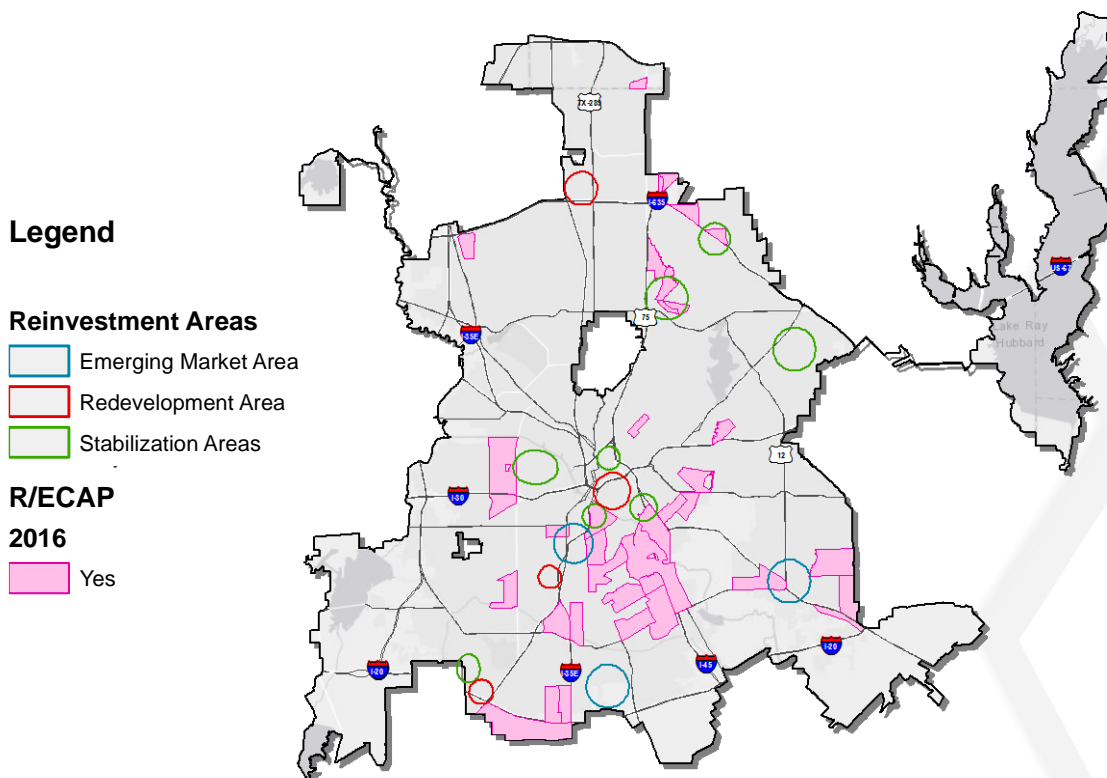
Figure 79: Dallas housing policy targeted areas and R/ECAP overlap

The targeted areas are classified as follows:

Redevelopment Areas (4)
Catalytic project scheduled to occur within the next 12 months that is supported by a third-party, independent market analysis. Project must include new housing production with affordable units offered for sale or rent to a mix of income bands.

Stabilization Areas (8)
Weaker real estate markets (G,H,I) surrounded by stronger markets (A-E), and, as such, are at risk of displacement based on market conditions and scheduled redevelopment projects.

Emerging Market Areas (3)
A blend of middle markets (C,D,E) with mostly G,H,I markets. Needs intensive environmental enhancements, public infrastructure assessments and corrective plans, code enforcement, master planning and formalized neighborhood organizations to be prepared for real estate investment.

The AFFH rule specifically calls for R/ECAP areas to be transformed into areas of opportunity and extends this duty to actions related to housing and urban development. Furthermore, the housing policy seeks "geographic strategies for **overcoming concentrations of poverty and segregation**" for "families at various income levels".

For purposes of the rule, affirmatively furthering fair housing "specifically 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 and 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 of a program participant's activities and programs relating to housing and urban development.**" (source: HUD, 2017)

The following table shows the extent to which the targeted areas under the housing policy overlap with R/ECAPs and the relative concentration of poverty and nonwhite population in each focus area.

Table 32: Housing policy targeted areas, R/ECAP overlap, poverty rate and nonwhite concentration

MAP ID	NAME	TYPE	R/ECAP Overlap?	Poverty Rate	Percent Nonwhite
1	LBJ – Skillman	Stabilization Areas	Complete	30%	79%
2	Vickery Meadow	Stabilization Areas	Complete	30%	65%
3	Casa View	Stabilization Areas	No	18%	66%
4	East Downtown	Stabilization Areas	No	26%	50%
5	The Bottom	Stabilization Areas	Substantial	31%	75%
6	Forest Heights	Stabilization Areas	Partial	34%	94%
7	Red Bird	Stabilization Areas	No	23%	89%
8	West Dallas	Stabilization Areas	Slight	36%	87%
9	Midtown	Redevelopment Area	No	17%	62%
10	High Speed Rail	Redevelopment Area	No	31%	68%
11	Wynnewood	Redevelopment Area	No	23%	90%
12	Red Bird	Redevelopment Area	No	34%	95%
13	University Hills	Emerging Market Area	No	23%	97%
14	Pleasant Grove	Emerging Market Area	Partial	37%	93%
15	Southern Gateway	Emerging Market Area	Partial	31%	89%

MAP ID	NAME
1	LBJ - Skillman
2	Vickery Meadow
3	Casa View
4	East Downtown
5	The Bottom
6	Forest Heights
7	Red Bird
8	West Dallas
9	Midtown
10	High Speed Rail
11	Wynnewood
12	Red Bird
13	University Hills
14	Pleasant Grove
15	Southern Gateway

Legend

Reinvestment Areas

▢ Emerging Market Area

▢ Redevelopment Area

▢ Stabilization Areas

R/ECAP

2016

▢ Yes

Figure 80: Housing policy targeted areas by types and R/ECAPs

GrowSouth Initiative and R/ECAPs

As presented in the preceding sections, the GrowSouth initiative is a major place-based investment strategy, begun in 2012, to bring economic development to the City's southern half. The economic development strategy identified eight focus areas as displayed in the maps below.
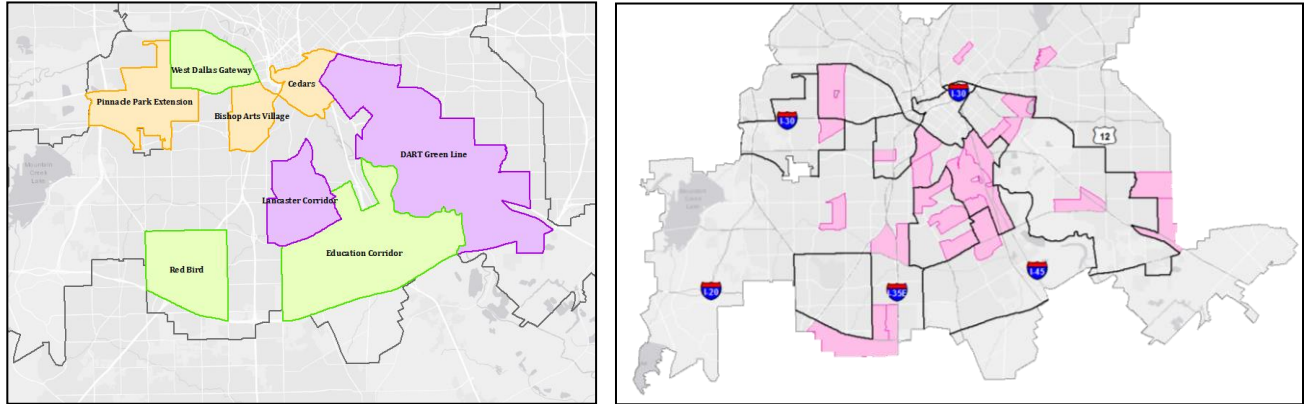
Figure 81: GrowSouth focus areas and R/ECAP overlap (2016)

Similar to the preceding section on Neighborhood Plus revitalization efforts, the following table shows the number of R/ECAPs contained (even partially) within designated GrowSouth focus areas. In addition, the table shows the average nonwhite population and poverty concentrations for each focus area.

Table 33: GrowSouth focus area, R/ECAPs, poverty rate and nonwhite concentration

	Number of R/ECAPs within GS focus area	Average nonwhite population concentration	Average poverty rate
Pinnacle Park Expansion	0	92%	30%
North Oak Cliff (Bishop Arts Village)	0	85%	27%
Greater Downtown/Cedars	0	61%	33%
Education Corridor	1	98%	29%
Red Bird	0	97%	24%
West Dallas Gateway	1	87%	36%
Lancaster Corridor	3	98%	38%
Dart Green Line	4	94%	35%
Total	9	93%	32%

The Lancaster Corridor and DART Green Line focus areas account for seven of the nine R/ECAPs contained in all GS focus areas. The West Dallas Gateway and Lancaster focus areas are respectively 4 and 2 percent points away from qualifying as an area of "extreme poverty level" (Wilson, 1980; HUD, 2017).

As discussed in the Segregation section, from 2012-2016 GS focus areas collectively registered a slight an increase in nonwhite population. While the majority of the GS focus areas recorded positive change in community indicators, half of these areas also saw an increase in the poverty rate, from 2% to 5%. This increase could potentially be explained by pre-existing poverty trends outpacing the economic benefits of GrowSouth investments, by economic benefits of GrowSouth Investments benefiting residents outside the focus areas, and/or by an influx of people living in poverty.

Table 34: Change in racial/ethnic composition and poverty rate for GrowSouth focus areas (2012-2016)

	Race (Nonwhite) 2016		Ethnicity (Hispanic/Latino) 2016		Poverty 2016	
	Count	Percent	Count	Percent	Count	Rate
All Focus Areas	202,558	93%	101,334	46%	69,837	32%
Change in population and % point	*-5,419*	*-0.7%*	*+8,406*	*-1.7%*	*+1,012*	*-1.2%*
Pinnacle Park Expansion	23,557	92%	21,118	83%	7,736	30%
Change in population and % point	*+2,208*	*+3.5%*	*+2,220*	*+4.1%*	*+917*	**+1.9%**
North Oak Cliff (Bishop Arts Village)	16,749	85%	14,755	75%	5,257	27%
Change in population and % point	*-2,054*	*-3.3%*	*-2,132*	*-4.4%*	*-1,621*	*-5.7%*
Greater Downtown/ Cedars	4,838	61%	1,401	18%	2,594	33%
Change in population and % point	*+961*	*-4.9%*	*+428*	*+1.1%*	*+950*	**+4.5%**
Education Corridor	25,393	98%	3,057	12%	7,277	29%
Change in population and % point	*+687*	*-0.4%*	*+1,597*	*+6%*	*-1,405*	*-6.5%*
Red Bird	24,852	97%	4,784	19%	6,262	24%
Change in population and % point	*+3,005*	*+1.7%*	*+2,304*	*+7.8%*	*+1,469*	**+3.6%**
West Dallas Gateway	13,309	87%	6,748	44%	5,431	36%
Change in population and % point	*-743*	*-8.2%*	*-1,770*	*-13.6%*	*-745*	*-6.8%*
Lancaster Corridor	28,724	98%	9,861	34%	11,212	38%
Change in population and % point	*+2,389*	*-1%*	*+2,496*	*+5.9%*	*+1,921*	**+3.3%**
Dart Green Line	65,136	94%	39,610	57%	24,068	35%
Change in population and % point	*+1,920*	*+0.2%*	*+3,263*	*+3.2%*	*-474*	*-1.7%*

3. Contributing Factors of R/ECAPs

During the first round of public meetings and focus groups, participants were asked to identify contributing factors to the seven fair housing issues at heart of the AFH tool[7]. The issue of R/ECAPs ranked fourth, after the issue of disparities in access to opportunity, segregation and disproportionate housing needs, in generating the most comments.

The most frequently cited contributing factor to R/ECAPs was the **lack of investments (public, private and community revitalization strategies) in specific neighborhoods**. Participants reported that the lack of amenities, lot vacancies and deteriorated properties in neighborhoods perpetuate housing issues. They explain that such issues deter individuals from buying and investing in homes because "property value will not increase". Residents stated that there is an overall lack of access to retail and different services, of transportation options, as well as lack of facilities for seniors. Importantly, meeting participants said that often, the only investment in R/ECAP areas is more low-income housing. In addition, residents expressed their concerns regarding the impacts that the chronic lack of investment and the presence of deteriorated and abandoned properties carry on communities. Participants explained that "if the community does not believe that there is a future, then they will lose hope and not try to make a difference". Others commented that the lack of investment and interest from the City resulted in "people giving up in their neighborhood and no longer calling 911".

The second most frequently cited set of contributing factors to R/ECAPs was the **location and type of affordable housing**, as well as the **loss of affordable housing** and the **displacement** of residents due to economic pressures. Residents reported that affordable housing tends to be concentrated in the same areas, which inevitably concentrates poverty. They further explained that the poverty concentration, resulting from affordable housing siting decisions, is further reinforced by the lack of access to transportation and jobs for the residents of these neighborhoods. In addition, meeting participants stated that the loss of affordable housing and gentrification is also contributing to the concentration of nonwhite and extreme poverty. The economic pressure felt by residents was overwhelmingly expressed in meetings in west Dallas. Attendees explained that "individuals have very limited resources" and are facing "major house repairs that are not covered by insurance", in addition to an increase in property taxes, all resulting in community displacement and poverty concentration.

Another major contributing set of factors to R/ECAPs identified by participants revolved around the issues of **discrimination** and **community opposition**. For meeting participants, the issue of community opposition to affordable and low-income housing ("Not In my Back Yard") was not only primarily denounced by attendees but also substantiated by other participants' comments positing that "affordable housing brings crime" or saying that the conditions in poverty-concentrated and racially segregated areas were the result of individuals' choices and behaviors. Similarly, participants stated that the ability of landlords to refuse vouchers also significantly contributes to the issue of R/ECAPs by prohibiting voucher holders to relocate to low-poverty areas.

Finally, residents expressed their concerns regarding the perceived lack of interest and responsiveness from the City in affirmatively addressing poverty and minority concentration. Participants explained that it is "government actions that intentionally create Negro districts", as well as local zoning decisions and lack of actions (deep income targeting) that is contributing to R/ECAP patterns.

---

[7] Segregation/Integration, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing Analysis, Disability and Access Analysis and Fair Housing Enforcement, Outreach Capacity and Resources Analysis.

<u>Sample AFH public engagement</u>

The following comments from public meetings, focus groups and surveys express public participants' concerns and views about poverty and minority concentration, community opposition and barriers to affordable housing development and local policies and practices:

Answering "What are the contributing factors to R/ECAPs?"

- "They are providing affordable housing but if it is provided in the same location: that will perpetuate the concentration *(of poverty)*"

- "The only investments in R/ECAPs is more low-income housing"

- "If you get too much affordable housing in a certain area, it does not grow"

- "So location and type: one of the biggest things that is driving the Trinity toll road is how people can get to their jobs, we don't' have good transit in low-income areas"

- "The more tear-downs you have, the fewer amenities, it's all perpetuating housing issues. How do you change this economic cycle to prevent this?"

- "You create areas that people want, if you look at vacant lots, the lack of amenities then there's no need to buy, as property value will not increase"

- "The TIF program was not designed to bring affordable housing. It's an economic tool, if you want more housing, you need to put it where land is cheap"

- "If you stick to where the land is the cheapest and if we're talking about fair housing, we stick to where the land is the cheapest, we will be looking into already segregated neighborhood"

- "The basic problem is not having houses near where you work"

- "The vouchers give people the opportunity to move out but today, these vouchers are turned down by most apartment complexes"

- "Criminal background limit people's opportunity in labor force and housing. This serves to further perpetuate the crisis"

- "If the community doesn't believe they have a future, they will lose hope and not try to make a change"

- "Concentration of affordable housing and lack of affordable housing"

- "Government actions that intentionally create negro districts"

- "The City does not do their part"

- "Discriminator housing policies and community opposition fueled by fear"

- "Citizens would like to hear solutions to the problems; the city has not addressed the issues in the past, citizens want to see action plans"

- "Individuals have shared that they have lost confidence in government"

- "West Dallas is getting gentrified very quickly"

- "Mixed-income housing. We have too much low-income housing that has made the mean income of our area so low. We are having trouble getting upscale restaurants and stores in our areas"

iii. Disparities in Access to Opportunity

1. Analysis

a. EDUCATION

i For the protected class groups on which HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe neighborhoods with high-performing elementary schools nearby and those near lower performing elementary schools. As the school system quality in a neighborhood improves, the score increases.

In Dallas, 78% of the black population and 67% of the Hispanic residents live in census tracts with school proficiency scores lower than 39 while 31% of the Asian/PI population and about 28% of the white population live in the same census tracts. On the other hand, 24% of the Asian/PI and almost 34% of the white populations live in census tracts with school proficiency scores greater than 80; however, only about 5% of the Hispanic and 4% of the black populations live in similar census tracts. The disparities that exist between different races and ethnicities in Dallas surpass those at the regional level.

Census tracts in the DFW region with school proficiency scores lower than 39 contain over 51% of the Hispanic population, over 56% of the black population but only 19% of the Asian/PI population and 22% of the white population. Census tracts in the DFW region with school proficiency scores greater than 80 contain almost 40% of the Asian/PI population and over 33% of the white population but only 11% of the Hispanic and black populations. An estimated 55% of Dallas families with children live in census tracts with school proficiency scores lower than 39 while only 32% of families with children in the region live in similar census tracts. Regionally, almost 28% of families with children live in census tracts with high school proficiency scores, but high-performing census tracts in Dallas only contain 15% of families with children.

Overall patterns across groups

Table 35: School proficiency index scores across groups, Dallas

Dallas Index Score	Number of census tracts	Percent White	Percent Black	Percent Hispanic	Percent Asian/PI	Percent Families with Children
0-9	125	3.8	22.8	12.4	3.7	10.7
10-19	147	7.0	26.6	18.3	7.5	16.1
20-29	142	7.6	15.8	19.3	8.8	14.9
30-39	142	9.2	12.3	16.5	11.2	13.3
40-49	97	9.9	6.1	10.8	14.3	9.8
50-59	94	9.9	5.8	7.9	9.9	7.2
60-69	74	9.7	3.9	5.6	11.3	7.1
70-79	66	8.9	2.9	3.9	9.2	5.7
80-99	96	18.0	2.7	3.8	11.7	8.4
90-100	70	16.0	1.1	1.5	12.3	6.7

Table 36: School proficiency index scores across groups, region

Region Index Score	Number of census tracts	Percent White	Percent Black	Percent Hispanic	Percent Asian/PI	Percent Families with Children
0-9	276	2.6	14.1	7.8	1.6	5.1
10-19	436	6.2	16.1	14.6	4.8	9.3
20-29	431	5.6	12.4	14.3	5.6	8.5
30-39	494	8.0	14.1	14.5	7.7	10.1
40-49	413	8.3	9.5	10.7	9.5	8.8
50-59	462	10.0	8.3	10.6	8.9	9.4
60-69	433	12.0	7.6	8.4	8.9	10.2
70-79	466	13.7	6.4	7.9	13.0	11.0
80-99	460	14.6	6.4	6.5	15.6	12.1
90-100	511	19.0	5.1	4.7	24.4	15.6

Spatial patterns in Dallas and the North Texas region
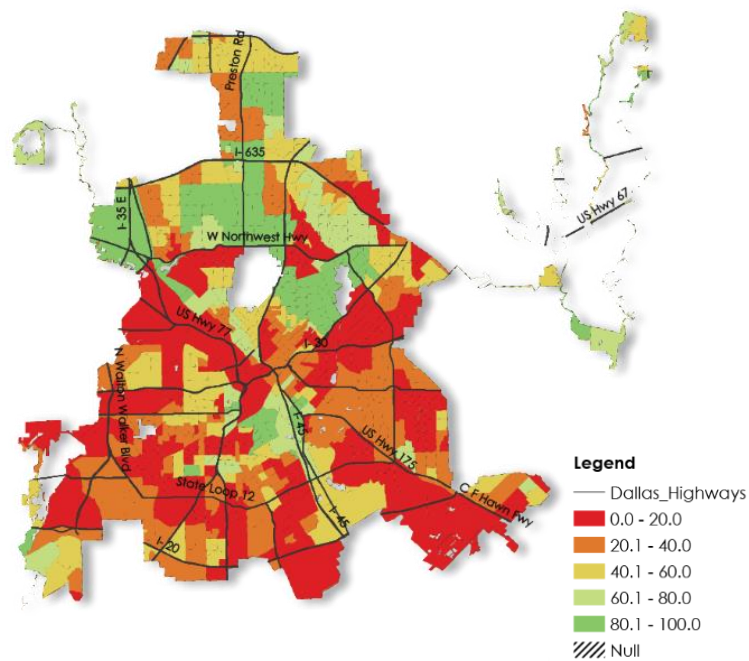
Figure 82: School proficiency index: spatial patterns, Dallas

While the school proficiency index does not provide a consistent spatial pattern, it does offer trends. In general, the school proficiency patterns match segregation patterns and the high-performing schools appear in north Dallas and the low-performing schools concentrate in east, west and south Dallas. However, some highly segregated Oak Cliff and even south Dallas neighborhoods also receive high school proficiency scores. Unfortunately, the emerging R/ECAP areas in north Dallas appear to coincide with low school proficiency scores. In Dallas, the low-performing school locations match patterns of both black and Hispanic segregation.
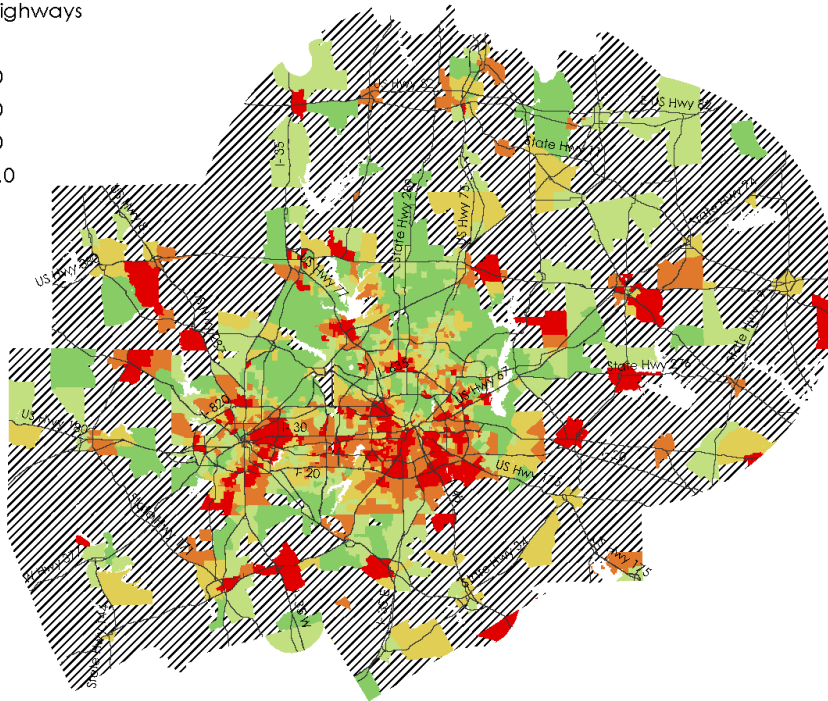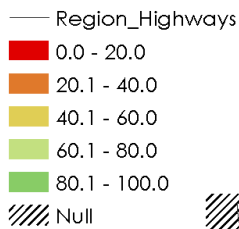
Figure 83: School proficiency index: spatial patterns, North Texas region

Figure 83 shows that the school proficiency index experiences significant geographic variability throughout the region; however, a few trends appear clear. The school proficiency indices for Dallas and Fort Worth show that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have low-performing schools. The school performance appears strongest in many suburban areas, especially those north of the two urban centers. Outside the urban cores, the remaining low-performing school communities mostly occur in rural areas. As an indicator, the index shows promise to help identify areas of opportunity.

> **ii.** *For the protected class groups on which HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.*

The HUD-provided table below shows that all populations within the City have an educational index above 30, indicating low or moderate access to quality schools. Black and Hispanic residents, whether in the total population or below the federal poverty line, have the lowest access to quality schools within the City and the region. Meanwhile, whites in total population have the greatest access to quality schools. But in population below the federal poverty line, Native American has greater access than white to quality schools.

The SP Index is lowest for black populations and lower still for Hispanics below the poverty line. The trends remain the same, with black populations having the lowest access to quality schools while whites and Asian/PI have the highest access throughout the region.

Access to proficient schools is significantly greater in north Dallas and lower in south Dallas.

(Dallas, TX CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	56.57	51.88	75.49	55.85	74.41	54.53	27.95
Black, Non-Hispanic	20.12	30.14	30.66	54.63	70.09	40.83	23.63
Hispanic	21.40	32.10	36.58	55.58	72.18	45.30	27.22
Asian or Pacific Islander, Non-Hispanic	42.89	45.18	64.65	61.57	81.45	51.30	27.75
Native American, Non-Hispanic	34.71	39.51	52.19	55.86	73.63	50.31	26.81
Population below federal poverty line							
White, Non-Hispanic	36.94	40.14	57.21	58.22	76.96	49.78	27.36
Black, Non-Hispanic	14.23	28.32	24.55	55.35	70.97	40.63	23.22
Hispanic	16.56	31.84	34.22	57.04	74.01	46.17	26.14
Asian or Pacific Islander, Non-Hispanic	29.17	38.36	50.87	62.96	82.98	49.06	25.65
Native American, Non-Hispanic	20.31	40.75	35.78	58.61	77.74	52.68	25.32
(Dallas-Fort Worth-Arlington, TX) Region							
Total Population							
White, Non-Hispanic	64.62	60.86	67.57	42.14	51.91	50.10	33.02
Black, Non-Hispanic	40.78	40.39	47.59	48.17	60.55	44.28	29.40
Hispanic	37.25	41.24	45.75	48.70	61.74	47.18	29.86
Asian or Pacific Islander, Non-Hispanic	66.83	61.68	74.36	48.94	60.65	48.35	33.45
Native American, Non-Hispanic	56.41	54.36	59.73	43.05	53.41	49.43	32.51
Population below federal poverty line							
White, Non-Hispanic	48.24	50.43	53.86	44.63	57.02	52.01	31.42
Black, Non-Hispanic	24.15	33.32	33.43	51.04	65.56	45.27	27.00
Hispanic	25.63	37.16	38.58	51.35	65.99	48.95	28.30
Asian or Pacific Islander, Non-Hispanic	51.26	52.34	60.78	52.22	67.80	51.48	30.06
Native American, Non-Hispanic	35.38	43.07	43.31	46.44	60.60	55.88	29.75

Background

In the context of fair housing, assessing disparities in access to proficient schools inevitably calls for consideration of the reciprocal relationship between housing and school policy. Analysts continue to point to the effects of education policies on housing segregation and disparities in access to opportunities (Tegeler & Hilton, 2017). As a point of departure, experts call attention to school district boundaries and school assignment policies. In a significant and rigorous article, Tegeler and Hilton (2017) critically examine the relationship between housing and school policies. They list some of the key drivers to housing segregation and hence disparities:

- "school district boundaries that are coterminous with local land use jurisdiction boundaries;
- state policies that prohibit or discourage school enrollment across school district lines;
- school attendance zones that are closely tied to demographically identifiable neighborhood boundaries;
- uncontrolled school choice policies (charters, vouchers and open enrollment);
- school siting decisions that do not take into account patterns of residential racial and economic segregation;
- resource allocation among schools;
- school rating systems and parental perceptions of school quality; and
- student transportation policies"

School Districts Boundaries

Dallas has 340 schools (Texas Education Agency, 2018). The City is primarily served by the Dallas Independent School District (DISD, 230 schools), followed by Richardson ISD (30 schools) and Uplift Education ISD (public charter school network, 18 schools). Figure 84 through Figure 86 show the boundaries of the school districts in the greater Dallas area and DISD elementary school attendance boundaries, as well as the schools located in Dallas.

Legend
Greater Dallas Area

Name ISD
- Carrollton-Farmers Branch ISD
- Cedar Hill ISD
- Coppell ISD
- Dallas ISD
- DeSoto ISD
- Duncanville ISD
- Forney ISD
- Garland ISD
- Grand Prairie ISD
- Highland Park ISD (Dallas)
- Irving ISD
- Lancaster ISD
- Lewisville ISD
- Mesquite ISD
- Plano ISD
- Richardson ISD
- Rockwall ISD
- Sunnyvale ISD
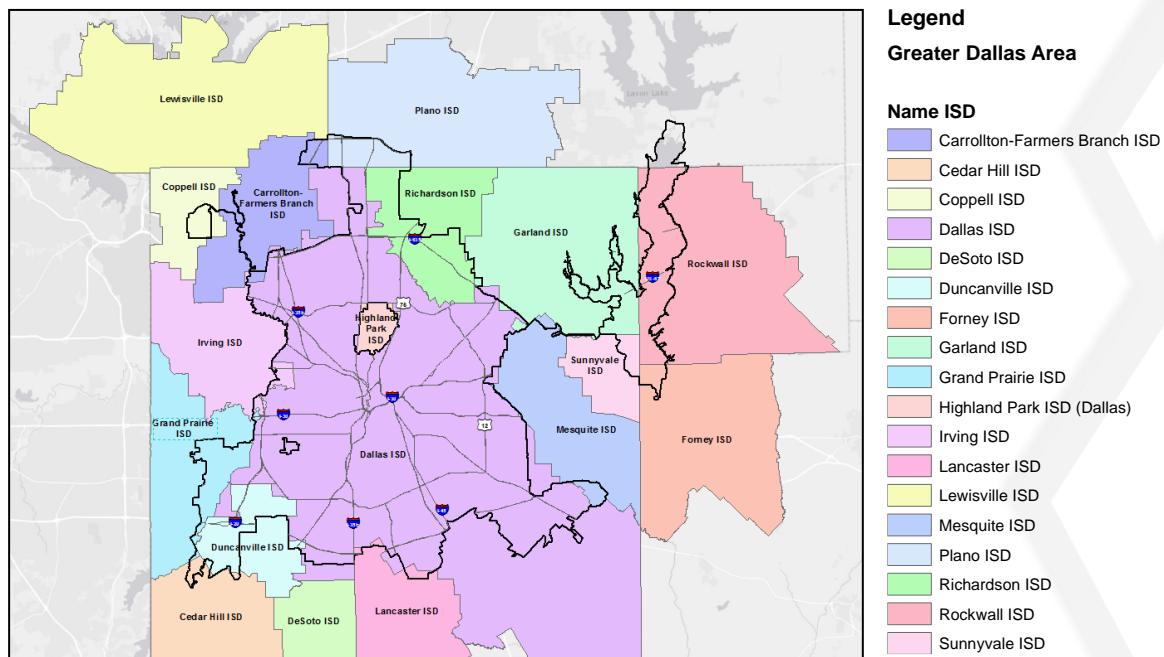
Figure 84: Independent school district boundaries (source: Texas Education Agency)
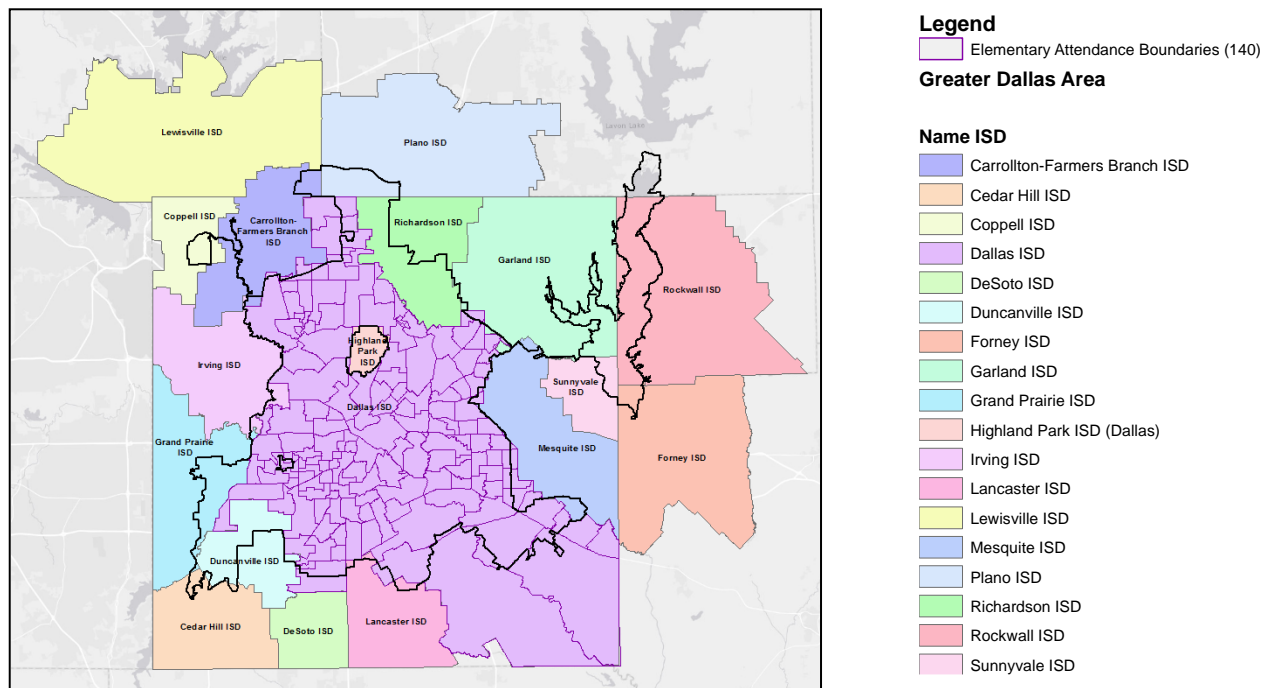
Figure 85: DISD school attendance boundaries

Attendance Zones and Neighborhood Racial/Ethnic Composition

Dallas County counts 17 public school districts[8] and 46 independent school districts (including open enrollment charter schools)[9]. DISD, the region's largest school district, has 140 elementary school attendance zones. The following map shows the concentration of nonwhite population at the census tract level overlaid with attendance zones. Because attendance zones tend to envelope more than a single census tract, a single colored attendance zone shows the relative homogeneity in racial/ethnic composition of the attendance zone.

The map sheds light on the widespread racially homogeneous composition of these attendance zones. As discussed in the preceding section on segregation, the southern sector of Dallas and hence its attendance zones are characterized by a disproportionately greater share of nonwhite population.
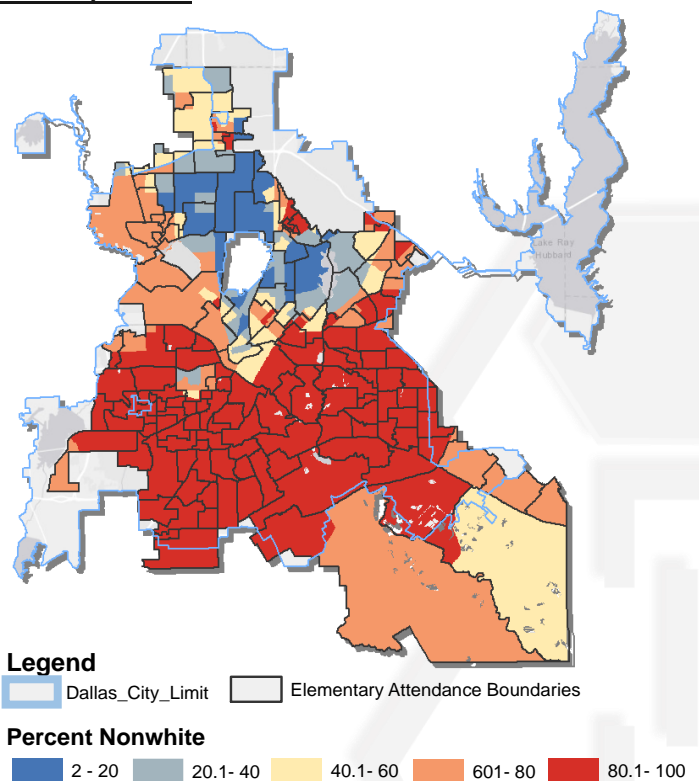
Figure 86: Nonwhite share within school attendance boundaries (DISD)

---

[8] http://www.dallascountytexas.us/publicschools/public _schools.htm
[9] https://www.har.com/school/list/county/DALLAS

Enrollment Policies

DISD follows primarily the traditional model of "**neighborhood attendance zones**", where most students are assigned to schools based on their residence. Parents are required to provide proof of residency for enrollment.

The following descriptive summary of **public school choice** options is extracted from DISD's informational guide for parents and students (FAQ) on the DISD website:

- Magnet Schools: This is a pre-existing list. The schools will stay the same as well as the academic entry requirements. The success of the district's Magnet offerings is a key driver in the district's commitment to expand a "best-fit" school for every child in Dallas ISD without academic entry requirements.

- Transformation Schools (Choice School): These are start-up campuses that design and implement a new school-wide Choice model. They do not have academic or parental entry requirements and showcase district-wide open enrollment procedures. They will open in previously vacant buildings, new school buildings, or in nontraditional spaces such as a co-location with a community college.

- Innovation Schools (Choice School): These are existing neighborhood schools that re-purpose the existing campus into a school-wide Choice model. They do not have academic or parental entry requirements. They stay in their existing facilities with current staff and continue to enroll students from their traditional attendance zones, maintaining their traditional neighborhood identities[10].

- In-school Choice Programs: These are small-scale choice programs that exist within a school. They are not school-wide models and not every student in the school participates. They may or may not have entry requirements.

School attendance zone boundaries, especially when tied to demographically identifiable neighborhood boundaries, produce public schools reflecting the demographics of the neighborhood. As such, attendance zones in racially/ethnically segregated neighborhoods are likely to produce segregated schools. Given the high degree of racial/ethnic segregation characterizing Dallas and in the context of fair housing, well-executed school choice systems are viable tools to foster integration and bridge disparity gaps.

Variations within but also across districts have the potential to deepen school segregation and unequal educational opportunities. The following tables compare adjacent districts characteristics and performance (Figure 87 and Table 37).

Considerable differences exist not only in terms of the socio-demographic characteristics, but also the performance rate of students served in each district. Highland Park ISD, which recorded a STAAR achievement rate of 97%, serves primarily white and no low-income students. On the other hand, DISD serves primarily low-income, nonwhite students and has a STAAR achievement rate 30 percentage points lower than Highland Park ISD.

As advanced by Tegeler and Hilton (2017), "the ability of wealthier towns to maintain high housing prices, commensurately high tax bases and well-resourced schools, and creating costly externalities in nearby cities and towns that have disproportionate shares of poor families— is a key structural driver of segregation".

---

[10] Commentary: the research has established that attendance zone boundaries tied to racially and economically segregated neighborhoods will likely produce segregated schools and perpetuate unequal educational opportunities.

Table 37: School district characteristics and performance

	Dallas ISD	Richardson ISD	Uplift Education ISD	Duncanville ISD	Highland Park IDS
STAAR Achievement (All students)	67%	79%	74%	66%	97%
STAAR Achievement (Low Income)	66%	70%	70%	64%	N/A
Percent White	5.13%	29.7%	4.2%	3.9%	85.8%
Percent African American	22.5%	21.1%	19%	40.9%	0.7%
Percent Hispanic	69.6%	38.9%	67.6%	52.3%	4.9%
Percent Other	2.4%	10.4%	9.3%	3.6	8.6%
Low-Income	87.8%	54.2%	75.4%	76%	0%
LEP/English Learner	43.9%	25.8%	31.5%	18.6%	0.8%
Mobility	20.4%	17.1%	4.8%	18.4%	2.3%
Enrollment	157,787	39,170	15,768	12,792	7,024
Student-teacher ratio	15 to 1	15.2 to 1	15.8 to 1	15.5 to 1	15 to 1
Average Teacher Salary	$56,063	$54,538	$50, 268	$54,422	$55,319
Average teacher Experience (years)	9.9	9.9	2	9.4	13

Legend

Elementary Attendance Boundaries (140)

Greater Dallas Area

Name ISD

- Carrollton-Farmers Branch ISD
- Cedar Hill ISD
- Coppell ISD
- Dallas ISD
- DeSoto ISD
- Duncanville ISD
- Forney ISD
- Garland ISD
- Grand Prairie ISD
- Highland Park ISD (Dallas)
- Irving ISD
- Lancaster ISD
- Lewisville ISD
- Mesquite ISD
- Plano ISD
- Richardson ISD
- Rockwall ISD
- Sunnyvale ISD
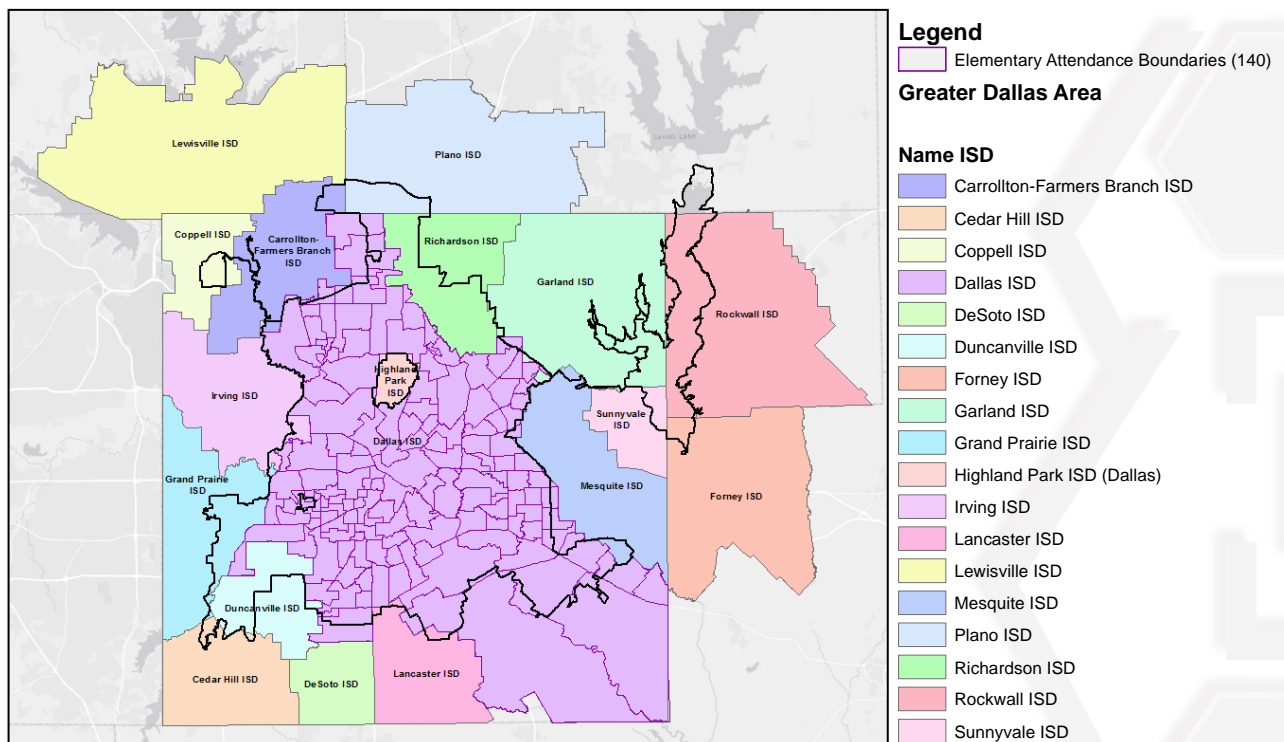
Figure 87: Independent school district boundaries (source: Texas Education Agency)

School funding

Texas has an extremely complex system for school finance that relies extensively on local property tax revenue, which is heavily dependent on property wealth (Villanueva, Education: Latest Work, 2018). To adjust for differences in property wealth among districts, the state recaptures revenue from wealthy districts and redistributes the funds to property-poor districts. Figures below show per-student revenue by source and program expenses by type for Dallas ISD and Highland Park ISD (Texas Education Agency, 2018). Figure 88 shows heavy reliance on local revenue and disparities between districts due to property wealth.
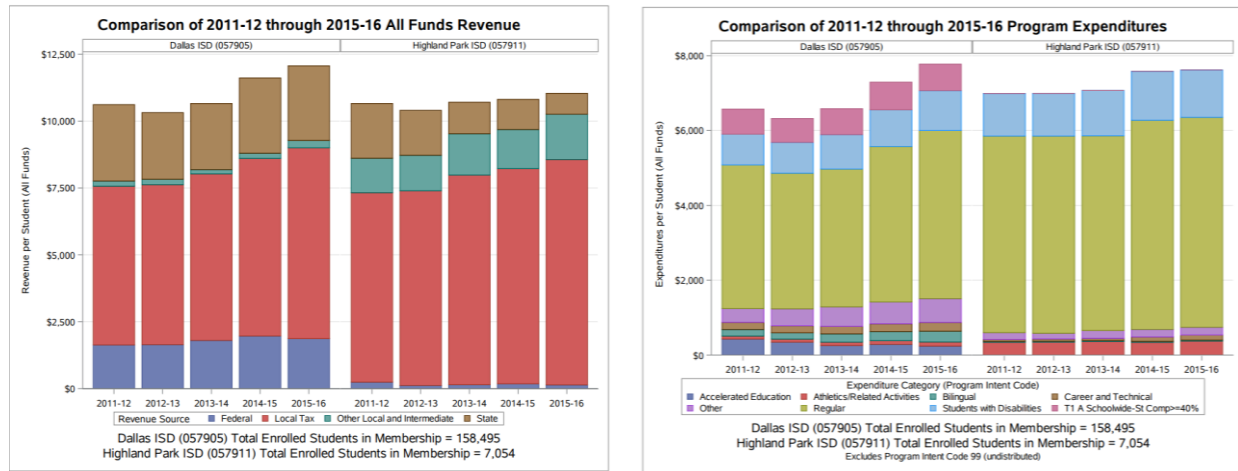
Figure 88: All funds revenue and programs expenditures: DISD, Highland Park ISD

Texas restricts its expenditures on education. Figure 89 shows statewide per-student expenditures in constant 2014 dollars. In real terms, with the exception of an increase in 2009, per-student expenditures are below 2003 levels, and average expenditure levels after the recession of 2008/09 are $400 less than before the recession. This is during a period of rapid growth in public school district enrollments across the state, including students who are English language learners and/or from impoverished households (Villanueva, 2015). Evidence shows that additional funding improves student performance outcomes by reducing class sizes, improving curriculum, addressing specific challenges, providing pre-kindergarten programs, retaining the best teachers and providing special programming for struggling learners (Lesley, 2010)

School Funding is Still Below Pre-Recession Levels

Per-student spending, in 2014 $
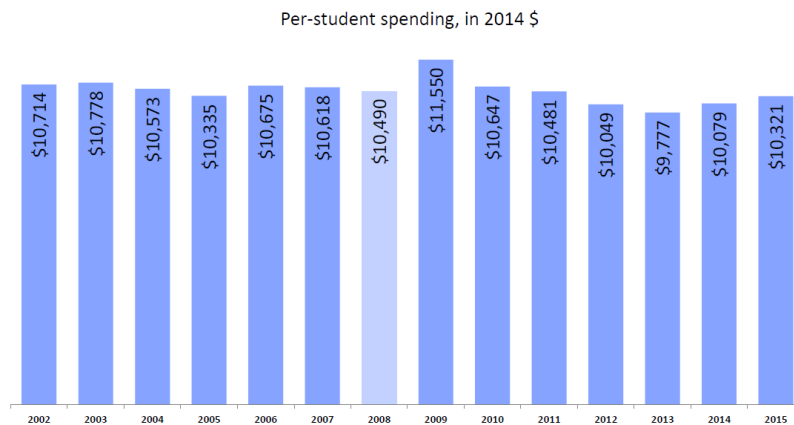
Source: CPPP analysis of TEA appropriations plus local revenue values from LBB.

Figure 89: School funding: per-student spending over time

a. *EMPLOYMENT*

The labor market engagement (LME) index provides a description of the relative intensity of labor market engagement and human capital in a neighborhood. The values represent the percentile of each census tract's score ranked nationally with a range from 0 to 100. As the labor market engagement index score increases, the labor force participation and human capital in a neighborhood appear stronger.

In Dallas, over 45% of the Asian/PI population and about 52% of the white population live in census tracts with labor market engagement scores greater than 80 while only 10% of the Hispanic population and 9% of the black population live in similar census tracts. The disparities between races and ethnicities in Dallas exceed those at the regional level. Census tracts in Dallas with labor market engagement scores lower than 40 contain almost 60% of the Hispanic population and almost 62% of the black population, but they only contain about 16% of the Asian/PI population and almost 14% of the white population.

Census tracts in the DFW region with labor market engagement scores lower than 40 contain over 47% of the Hispanic population, over 42% of the black population, less than 12% of the Asian/PI population and less than 18% of the white population. DFW regional census tracts with labor market engagement scores greater than 80 contain almost 53% of the Asian/PI population, over 37% of the white population and only 17% of the black and 13% of the Hispanic populations. In Dallas, 47% of families with children live in census tracts with labor market engagement scores lower than 40, while in the region 27% of families with children live in similar census tracts.

In Dallas, only 18% of the extremely low-income population (30% AMI) lives in census tracts with labor market engagement scores greater than 80 while in the region only 15% of the extremely low-income population live in these census tracts. In Dallas, almost 57% of these extremely low-income households live in census tracts with labor market engagement scores lower than 40 while in the region only 47% of these extremely low-income households live in comparable census tracts.

In Dallas, an estimated 16% of the population between 30% and 50% AMI live in census tracts with labor market engagement scores greater than 80 while in the DFW region, only 15% live in similar census tracts. In Dallas, almost 52% of the very-low-income households live in census tracts with labor market engagement scores lower than 40, but in the DFW region, only 42% of these households live in comparable tracts. In Dallas, 22% of the ami80 population lives in census tracts with labor market engagement scores greater than 80 while in the region, only 20% live in similar census tracts. In the DFW region, about 34% of low-income households live in census tracts with labor market engagement scores lower than 39 and over 44% of Dallas low-income households live in comparable census tracts. For poverty, the comparison between Dallas and the region presents a mixed outcome for the labor market engagement score where more people live in census tracts at each extreme than the corresponding regional values.

Overall patterns across groups

Table 38: Labor market engagement index score across groups, Dallas

Dallas Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	36	1.4	20.5	8.1	0.7	15.4	10.5	7.2	7.8	6.3	7.0	12.6
10-19	40	3.7	21.2	17.2	2.9	17.6	15.0	12.4	15.5	13.3	12.0	17.0
20-29	33	3.1	9.2	17.9	5.3	12.0	12.6	11.9	19.7	16.3	11.8	10.0
30-39	35	5.5	10.7	16.4	6.8	11.8	13.7	12.7	16.6	14.9	11.8	11.4
40-49	22	3.7	5.5	10.3	7.0	7.7	9.6	8.8	11.1	10.6	7.6	5.7
50-59	25	6.6	7.9	7.8	6.7	5.9	7.3	8.7	7.0	7.1	7.6	7.3
60-69	32	9.7	7.6	6.4	12.6	6.6	7.9	8.3	7.4	7.4	8.1	7.7
70-79	33	14.3	7.9	5.5	12.5	5.3	7.1	8.4	4.5	6.4	10.1	8.9
80-99	36	15.1	4.0	5.0	12.1	6.7	5.8	7.0	4.9	7.0	8.7	6.8
90-100	87	37.0	5.5	5.5	33.2	10.9	10.5	14.6	5.4	10.6	15.3	12.6

Table 39: Labor market engagement index score across groups, North Texas

Region Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	73	1.4	11.7	6.0	0.8	9.6	6.1	3.9	6.0	4.4	3.2	5.9
10-19	95	3.1	11.5	11.6	1.7	11.8	9.8	7.4	10.9	8.3	6.0	9.0
20-29	114	5.8	8.6	14.7	4.0	13.0	12.0	10.7	15.6	12.4	8.4	10.4
30-39	137	7.7	10.8	14.9	4.6	13.1	14.1	11.9	15.2	12.6	9.7	12.2
40-49	135	9.6	7.9	11.8	5.4	11.0	12.6	11.8	11.7	10.0	9.7	11.3
50-59	129	10.1	9.7	9.8	6.6	9.4	10.4	10.8	9.1	8.6	9.7	10.8
60-69	130	10.4	10.8	8.9	10.2	8.4	9.6	10.6	9.0	9.1	10.1	9.7
70-79	166	14.8	12.2	8.9	13.7	8.3	10.2	12.5	8.0	9.9	12.8	11.3
80-99	164	16.1	9.1	7.5	17.9	7.3	7.7	9.9	7.3	10.4	13.5	9.6
90-100	250	21.1	7.7	6.0	35.0	8.1	7.6	10.4	7.1	14.2	16.9	9.6

In Dallas, only 10% of the limited English proficiency (LEP) population lives in high performing census tracts with labor market engagement scores greater than 80 while in the region, 14% lives in similar census tracts. While 59% of the Dallas LEP population lives in census tracts with labor market engagement scores lower than 39, in the region, over 47% of the LEP population lives in similar census tracts. In Dallas, only 18% of the foreign-born population lives in census tracts with labor market engagement scores greater than 80 while in the region, 24% lives in similar census tracts. Almost 51% of the Dallas foreign-born population lives in census tracts with labor market engagement scores lower than 39 while 38% of the regional foreign-born population lives in low performing census tracts. In both Dallas and the region, 19% of the disability population lives in census tracts with labor market engagement scores greater than 80. Almost 51% of the Dallas disability population lives in census tracts with labor market engagement scores lower than 39 while 38% of the regional disability population lives in low performing census tracts. The white population equals or outperforms all protected classes except Asian/PI in Dallas and the region, and the region consistently outperforms Dallas for these protected classes.

The job proximity index provides a description of the relative accessibility of a given neighborhood to all jobs locations. The values represent the percentile of each census tract's score ranked nationally with a range from 0 to 100. As the job proximity index score increases, job opportunities in a neighborhood appear stronger.

Overall, the index values indicate that Dallas offers a greater access to jobs than the region, but the relative access to jobs varies across population groups. The white population significantly outperforms all other groups. The highest scoring block groups contain 26% of the white population, but only 18% of the black population and families with children live in these block groups. While 36% of the white population lives in low performing block groups, these neighborhoods house fifty percent of the black population. Hispanic and Asian/PI households fall in-between these extremes with Asian/PI households having better job proximity. White and Asian/PI households in Dallas tend to live in areas of significantly greater job access than black and Hispanic households.

Table 40: Job index score across groups, Dallas

Dallas Index Score	Number of census tracts	Percent White	Percent Black	Percent Hispanic	Percent Asian/PI	Percent Families with Children
0-9	114	4.9	17.7	12.8	5.5	11.4
10-19	114	7.5	12.1	12.3	9.0	11.4
20-29	116	12.8	11.9	11.3	12.8	12.7
30-39	96	10.6	8.7	10.0	10.1	10.6
40-49	104	8.9	10.0	10.0	10.5	9.6
50-59	93	10.1	9.7	7.2	13.6	9.4
60-69	95	9.9	5.9	9.6	8.1	9.1
70-79	89	9.3	6.1	7.6	7.7	7.7
80-99	106	12.5	8.0	9.6	9.3	9.6
90-100	126	13.5	9.8	9.6	13.4	8.4

Table 41: Job index score across groups, North Texas

Region Index Score	Number of census tracts	Percent White	Percent Black	Percent Hispanic	Percent Asian/PI	Percent Families with Children
0-9	439	7.5	14.2	11.7	8.2	10.0
10-19	437	8.9	11.2	10.7	11.1	10.2
20-29	441	10.9	11.5	10.4	11.1	11.5
30-39	442	11.8	10.4	10.7	11.2	11.9
40-49	436	11.0	10.1	9.9	12.6	10.9
50-59	439	11.1	9.4	9.3	10.3	10.3
60-69	441	11.0	8.4	9.5	9.0	10.1
70-79	437	10.3	7.9	9.7	8.0	9.5
80-99	436	9.4	8.8	9.5	9.4	8.8
90-100	435	8.0	8.1	8.7	9.1	6.8

At the regional level, all of the races and ethnicities have similar proportions living in very high scoring census tracts; however, families with children lag a few percent behind the white

population. Low performing census tracts contain a smaller share of the white population (39%) than the other groups; these census tracts contain 42% of the Asian/PI population, 44% of the Hispanic population, 44% of families with children and 47% of the black population. While most of the white population in these low performing census tracts resides in rural areas, the other groups regularly live in denser areas.

ii.	*For the protected class groups on which HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.*

Figure 90 shows the jobs proximity index scores. The scores vary widely with higher proximity scores in north and northwest Dallas, while the scores improve along the freeway corridors in these areas. South and particularly southeast Dallas score poorly for jobs proximity outside most freeway corridors. Some developing R/ECAPs in north and east Dallas have low jobs proximity index scores. The jobs proximity index shows some relationship with nonwhite segregation patterns; however, transportation facilities also play a significant role in this index.
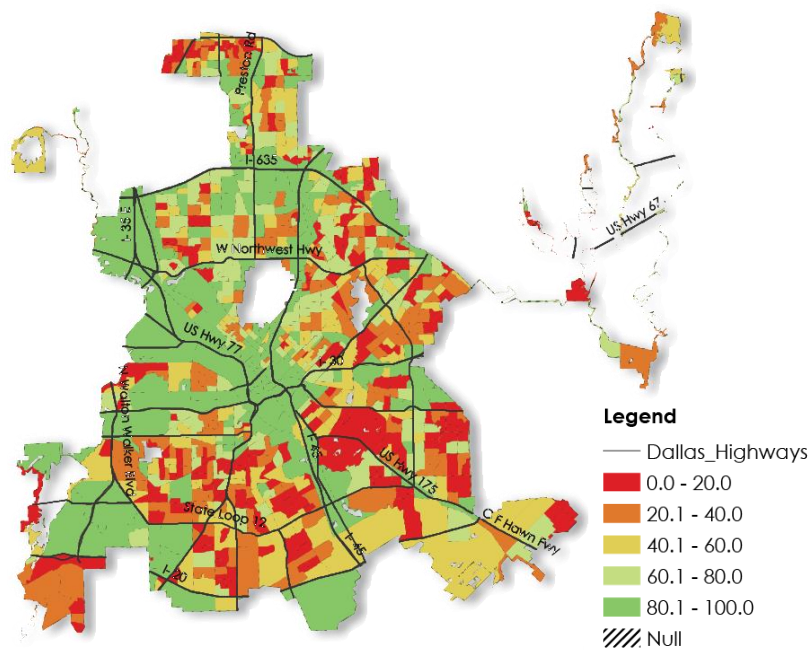
Figure 90: Jobs proximity index: spatial patterns, Dallas

Figure 91 shows the HUD LME Index scores for each census tract in Dallas. The LME index almost directly matches the patterns of white/nonwhite segregation present in Dallas. Only north Dallas produces consistently high scores and almost all of east, west and south Dallas generate low scores for LME, which indicates that they have lower employment, lower labor force participation rates and fewer numbers of residents with bachelor's degrees or other higher education; however, a few pockets of opportunity may be developing in Oak Cliff. Unfortunately, many of the areas in north Dallas with developing R/ECAPs appear to have lower LME scores. All persistent R/ECAPs have very low labor market index scores.
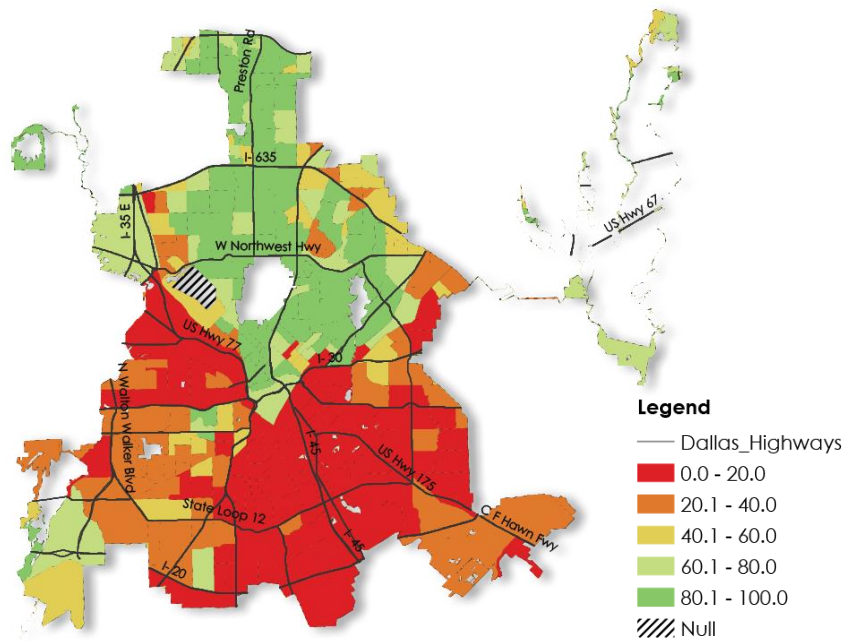
Figure 91: Labor market engagement index: spatial patterns, Dallas

From a regional perspective, lower JP scores occur in more rural locations. The highest access to jobs follows the highway system with the mid-cities showing the most consistently higher scores. The southeastern portions of Dallas and Fort Worth that demonstrate the most severe black segregation have the most consistently low performance within the urbanized area for the JP index. Many rural areas have low jobs proximity index scores. Closer proximity to a freeway corridor appears to positively influence this score, but the index does not demonstrate any other clear trends. Segregation in the region appears to have a limited effect on this index.

At the regional level, the labor market engagement Index reveals clear trends. The labor market indices for Dallas and Fort Worth show that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have low labor market engagement. The suburban areas within the NCTCOG planning area have the strongest labor market engagement; however, some suburban areas in Dallas and Tarrant County do not score as well, and south and southeast Dallas County perform particularly poorly. Most rural census tracts have at best a moderate labor market engagement score, although exceptions emerge in Cooke, Ellis and Parker counties. As an indicator, the LME index shows promise to help identify areas of opportunity.

Figure 92: Labor market engagement (bottom) and jobs proximity (top) indices: spatial patterns, North Texas region

Spatial mismatch: Job-Affordable Housing

Participants in public participation events identified the location of employers and low wage rates as important contributing factors to access to opportunity. Participants stated that jobs are not located near housing affordable to the employees and that the problem is exacerbated by the lack of affordable transportation connecting jobs with affordable housing. Many participants also added that more affordable housing is needed that could meet the needs of low- and moderate-income households, including factory workers. Participants stated that affordable housing is not available to meet the needs of all workers. ICP representatives said one of the factors motivating their clients to move out of high-poverty communities is to have greater access to job centers.

The following map shows the aggregate number of employees (for employers with at least 100 employees) at the census tract level. Major employment centers are primarily located in the west Dallas, downtown and northern areas of the City.

Table 42: Top employers in Dallas

Rank	Employer	Sector	Number employees
1	UT Southwestern Kern Wildenthal Biomedical Research Building	Health Care and Social Assistance	12,600
2	UT Southwestern Medical Center at Dallas	Administrative, Support and Waste Management Services	10,794
3	Parkland Hospital	Health Care and Social Assistance	6,900
4	Medical City Dallas Hospital	Health Care and Social Assistance	6,000
5	Children's Medical Center Dallas Baylor University Medical Center	Health Care and Social Assistance	5,500
6	Baylor University Medical Center	Health Care and Social Assistance	5, 500
7	Southwest Airlines Corporate Office	Retail Trade	5, 049
8	Texas Health Presbyterian Hospital	Health Care and Social Assistance	4, 019

While skill requirements, wage rates and salary information are not available for this data set, this list suggests it is very likely that for these employers, employees hold high-paying white-collar jobs.
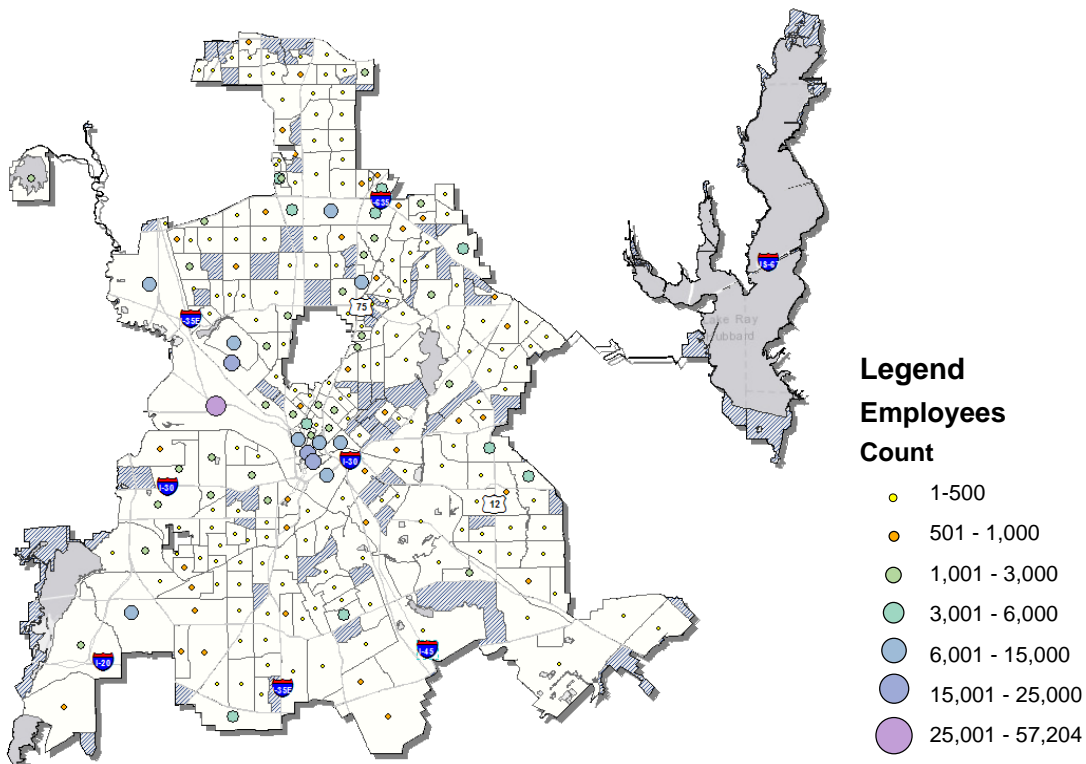
Figure 93: Employees count by census tract, Dallas

Small Business Job Growth

Source: Paychex IHS Small Business Jobs Index, December 2017.

Figure 94: Paychex IHS small business jobs index (source: City of Dallas website)

The Paychex IHS small business jobs Index provides an up-to-date measurement of the change in small business employment. An index value less than 100 indicates a slowdown in small business hiring. According to the index, Dallas continued to decline in small business employment growth compared to other indexed metro areas in the nation, decreasing to 99.7 in December as compared to November's index value of 108.7 (source: City of Dallas Economic Development website).

Public Transportation Performance and Access to Employment

The Center for Neighborhood Technology (CNT) created an analytical platform using a wealth of transportation-related data to assess the performance, quality and impact of public transit.

The following map shows the number of jobs accessible within a 30-minute transit commute by workers with monthly earnings greater than $3,333. The darker the shade (blue) the lower the number of jobs accessible within that time commute. The southern sector, northwest and far east Dallas have a significantly lower access to jobs (in numbers) than the rest of the City. Greater access to higher paying jobs by transit is found around the Central Business District and north of the Park Cities.

While more than 92% of commuters live near transit (half a mile), only 4.7% commute via public transportation. Proximity to transit does not always translate into transit use, nor transportation affordability (Smart & Klein, 2018). In other words, it is possible that low-income households living near transit are unable to commute to work.

Key facts:

- An estimated 10% of households (46,627) near transit have occupants who own no vehicles
- A regional monthly transit pass costs $160
- Jobs near transit are primarily in health care and social assistance and require some college or associate degree
- Jobs ($3,333/month) are not equally accessible by transit within the City

Number of jobs accessible within a 30 minute transit commute held by workers with earnings greater than $3333/month on average for households.

< 12,500 Jobs ■ 12,500-25,000 Jobs ■ 25,000-50,000 Jobs ■ 50,000-75,000 Jobs ■ 75,000-100,000 Jobs ■ 100,000-125,000 Jobs ■ 125,000-150,000 Jobs ■ 150,000 Jobs+
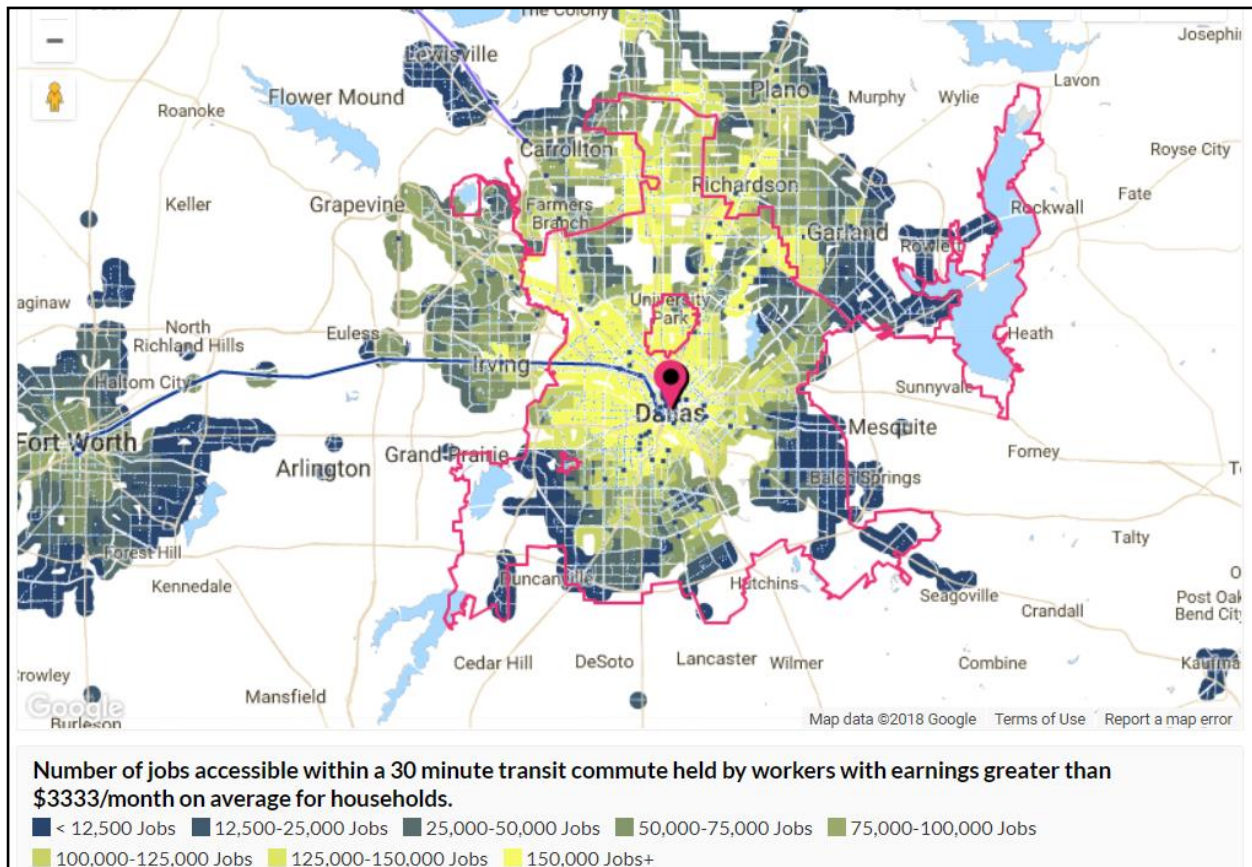
Figure 95: Number of jobs with earnings exceeding $3,333/month accessible within a 30-minute transit commute (source: Center for Neighborhood Technology)

JOBS NEAR TRANSIT IN DALLAS, TX

93.9%

Percent of jobs near transit

785,901 of **836,594** total jobs in Dallas, TX are within ½ mile of transit.

Top 3 Jobs Near Transit by Type:

109,583 Health Care and Social Assistance

98,384 Information, Professional, Scientific, and Technical Services

84,785 Management of Companies and Enterprises, Administrative and Support and Waste Management and Remediation Services

Jobs Near Transit by Educational Attainment:

185,959 Bachelor Degree or Advanced

196,492 Some College/Associates Degree

147,220 High School

92,966 Less than High School

TRANSIT ACCESS TO JOBS WITHIN A 30 MINUTE COMMUTE

184,638

Jobs accessible by transit

Total number of jobs accessible from the average household in Dallas, TX within a 30 minute transit commute.

Transit Access to Jobs by Type:

Arts, Entertainment, and Recreation, Accommodation and Food Services (18,469 jobs)

Construction, Utilities, Agriculture, Forestry, Fishing and Hunting, Mining, Quarrying, and Oil and Gas Extraction (9,655 jobs)

Educational Services (18,115 jobs)

Finance and Insurance, Real Estate and Rental and Leasing (21,559 jobs)

Health Care and Social Assistance (23,621 jobs)

Information, Professional, Scientific, and Technical Services (29,135 jobs)

Management of Companies and Enterprises, Administrative and Support and Waste Management and Remediation Services (17,327 jobs)

Manufacturing (6,434 jobs)

Public Administration and Other Services (13,921 jobs)

Retail Trade (13,695 jobs)

Wholesale Trade, Transportation and Warehousing (12,707 jobs)

VEHICLES BY OWNERSHIP: Households within ½ mile of transit that own vehicles.

No Vehicles	1 Vehicle	2+ Vehicles
10%	**44%**	**46%**
46,627 households within ½ mile of transit own no vehicles.	195,886 households within ½ mile of transit own 1 vehicle.	202,554 households within ½ mile of transit own 2 vehicles.
compared to 48,205 or 10% for this location	compared to 207,229 or 43% for this location	compared to 223,927 or 47% for this location

Figure 96: Access to jobs: performance metrics (source: CNT)

Employment location, wage rate and housing affordability

Public meeting participants stated that in Dallas, employment locations, transportation barriers and low wages considerably affect their ability to secure affordable housing and to access opportunities.

In 2018, the National Low Income Housing Coalition (NLIHC) released its Out of Reach report that documented the gap between renters' wages and the cost of rental housing. The report's Housing Wage was the hourly wage a full-time worker must earn to afford a modest rental home without spending more than 30% of his or her income on housing costs. It was based on HUD's Fair Market Rent (FMR), which is an estimate of what a family moving today can expect to pay for a modest rental home in the area (source: NILHC website). The following key findings are based on NLIHC's Out of Reach report (2018).

- In Texas, an individual working for minimum wage ($7.25/hour) needs to work 86 hours a week to afford a modest one-bedroom rental home
- A rent affordable at minimum wage in Texas and Dallas County is $377
- A significant wage/cost-of-housing gap exists for low-income households in Texas and Dallas County
- The housing wage is greater in Dallas County ($20.71) than the state average ($19.32) and considerably larger than minimum wage ($7.25) *[two-bedroom]*
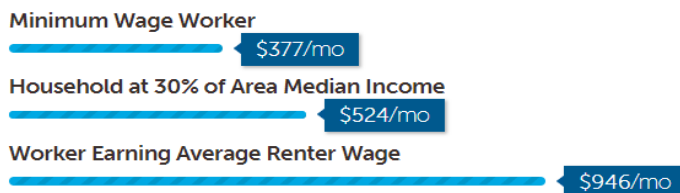
Figure 97: Housing wage and affordability, State of Texas (Source: NLIHC)

Number of Households	Texas	Dallas County
TOTAL	9,289,554	894,542
RENTER	3,542,096	442,258
PERCENT RENTERS	38%	49%

Housing Wage	Texas	Dallas County
ZERO-BEDROOM	$13.52	$14.04
ONE-BEDROOM	$15.62	$16.88
TWO-BEDROOM	$19.32	$20.71
THREE-BEDROOM	$26.10	$27.83
FOUR-BEDROOM	$32.31	$35.69

Fair Market Rent	Texas	Dallas County
ZERO-BEDROOM	$703	$730
ONE-BEDROOM	$812	$878
TWO-BEDROOM	$1,005	$1,077
THREE-BEDROOM	$1,357	$1,447
FOUR-BEDROOM	$1,680	$1,856

Annual Income Needed to Afford	Texas	Dallas County
ZERO-BEDROOM	$28,129	$29,200
ONE-BEDROOM	$32,489	$35,120
TWO-BEDROOM	$40,185	$43,080
THREE-BEDROOM	$54,280	$57,880
FOUR-BEDROOM	$67,204	$74,240

Minimum Wage	Texas	Dallas County
MINIMUM WAGE	$7.25	$7.25
RENT AFFORDABLE AT MINIMUM WAGE	$377	$377

Work Hours/Week at Minimum Wage	Texas	Dallas County
ZERO-BEDROOM	75	77
ONE-BEDROOM	86	93
TWO-BEDROOM	107	114
THREE-BEDROOM	144	154
FOUR-BEDROOM	178	197

Renter Wage	Texas	Dallas County
ESTIMATED MEAN RENTER WAGE	$18.20	$23.99
RENT AFFORDABLE AT MEAN RENTER WAGE	$946	$1,248

Work Hours/Week at Mean Renter Wage	Texas	Dallas County
ZERO-BEDROOM	30	23
ONE-BEDROOM	34	28
TWO-BEDROOM	42	35
THREE-BEDROOM	57	46
FOUR-BEDROOM	71	60

Supplemental Security Income (SSI) Payment	Texas	Dallas County
SSI MONTHLY PAYMENT	$750	$750
RENT AFFORDABLE TO SSI RECIPIENT	$225	$225

Rent Affordable at Different Income Levels	Texas	Dallas County
30% OF AREA MEDIAN INCOME (AMI)	$524	$579
ESTIMATED RENTER MEDIAN HOUSEHOLD INCOME	$954	$980

Figure 98: Housing wage, Fair Market Rent and affordability, State of Texas and Dallas County (Source: NLIHC)

Workforce Advancement, Training and Resources:

Workforce Solutions Greater Dallas (WFSDallas), which is the workforce system for the Greater Dallas region, has developed a Workforce Innovation and Opportunity Act Plan (2017-2020) with six key elements:

- engage employers within the workforce system to offer business-led programming,
- assist workers and families to bring in a living wage,
- provide educational and skills opportunities to special populations of youth, offenders (Dallas LEAP2) and individuals with disabilities (Vocational Rehabilitation),
- engage disconnected youth to offer career exploration and skills training in demand occupations with the goal of employment or enrollment in post-secondary education,
- organize education and training into career pathways for job seekers to accelerate their advancement while meeting employer needs, and
- focus on people living in poverty to better their lives through better work.

WFSDallas invests approximately $90 million annually in workforce supported by government and private funding. These funds provide a broad range of programs to address regional workforce issues with business-led objectives including job training, workplace education, child care and educational initiatives. From the WFSDallas website:

Talent Identification– WFSDallas uses WorkInTexas.com, the State's online job matching platform, as part of effective sourcing plan. We assist hiring managers find the talent they need from posting jobs, applicant screening, interviewing candidates to on-boarding new hires.

Customized Hiring Events-held at our eight workforce centers to assist employers with finding a quality workforce. Please see our website @ www.wfsdallas.com or the Employer Hotline @ 214-302-5555 for hiring event schedules.

Training New and Current Employees—offered on-site high school equivalency and English language acquisition services and skills training scholarships for job seekers. We also coordinate current worker skills training through Skills Development Grants with the Dallas County Community College District and other resources.

Outplacement Services–we offer employers outplacement/Rapid Response services for their employees should a lay-off be necessary. Services include customized onsite career counseling and job search assistance, resume and interview preparations workshops, education and training resources, unemployment insurance information and lay-off aversion information.

Additional Services may include labor market, talent supply and prevailing wage data for existing/prospective employers, as well as, Work Opportunity Tax Credits/ Incentives information and employer seminars.

WORKFORCESOLUTIONS
GREATER DALLAS

Job-ready individuals can access hiring events and job postings within all eight workforce centers throughout Dallas County and obtain that next job! www.workintexas.com

Job seekers compete due to academic or skill deficiencies can attend seminars, classroom instruction and/or formal college classes that facilitate workforce "credentials" leading to a job or obtaining better jobs, leading to a career.

Job Seekers and Current Workers access "no cost" instruction for adult literacy, HS equivalency, English language skills, workplace "soft" skills needed for employment and future career opportunities.

Online services include job matching, virtual job readiness workshops, high school equivalency instruction, career pathway information—to name a few.

Workforce Centers provide self-help to accomplish job search assistance, job matching and career exploration! All centers have computers available, learning labs, work-ready workshops (resume writing, social media for job search, interviewing skills, financial literacy, networking and more) and weekly hiring events.

Specialized services can make a difference. Highly trained workforce staff assist with assessment, training, job search, referrals to improve English language skills, high school equivalency certificates and skills training. Customized efforts are made for individuals with disabilities, workers 50+, military veterans, young adults/students and laid off workers, including professionals.

WORKFORCE TRAINING

A skilled and talented workforce is critical for the development and sustainability of growing industries and a vibrant and diversified Dallas economy. Various resources are available, at no cost, to address your business' workforce development needs.

The Texas Workforce Commission

The Texas Workforce Commission (TWC) is a state agency that provides workforce development services to employers and job seekers. TWC provides grants for customized training:

The **Skills Development Fund** is Texas' premier job-training program. The program assists businesses and trade unions by financing the design and implementation of customized job-training projects. This fund successfully merges business needs and local customized training opportunities into a winning formula to increase the skills levels and wages of the Texas workforce.

The **Skills for Small Businesses** program supports companies with fewer than 100 employees, emphasizing training for new workers though it also may help upgrade the skills of incumbent workers. In partnership with a public training provider, the program pays up to $1,800 for each new employee or $900 for existing employees using existing curriculum.

All TWC programs require employers to pay no less than the prevailing wages in their local market for the trained occupation. Program parameters are subject to change at any time. For more information on training programs and services visit http://www.twc.state.tx.us/businesses/train-your-workforce or call (877) 463-1777.

Federal support is also available through the **Work Opportunity Tax Credit**. Visit http://www.doleta.gov/wotc for more information.

Workforce Solutions Greater Dallas

Workforce Solutions Greater Dallas (WFS Dallas) provides human resource solutions for employers seeking a talented workforce and for jobseekers seeking competitive employment opportunities in Dallas County. WFS Dallas services include:

o Applicant screening and recruiting, including specialized recruiting services;

o Hiring events for individual employers and groups of employers;

o Assessment services;

o Customized training for new and current employees;

o Outplacement services during downsizing;

o Information regarding labor market, applicant pool, and hiring climate.

For more information visit: http://employer.wfsdallas.com/employers or call (214) 302-5555.

Dallas County Community College District

Dallas County Community College District (DCCCD) is one of the largest undergraduate institutions in the state of Texas with seven colleges offering customized training to meet employers' needs for training, re-training, industry-specific certifications. Needs assessment / skills training / professional development can be offered at the job site with flexible scheduling for employees and assistance in client-targeted job placement.

Visit http://www.dcccd.edu/workforcepartners for more program information.

b. TRANSPORTATION

i | *For the protected class groups on which HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.*

Low Transportation Cost Index (LTC)

This index estimates the transportation costs for a three-person single-parent family with income at 50% of the area median income for renters for the region. Values are inverted and percentile ranked nationally, from 0 to 100. A higher index score indicates lower transportation costs for a neighborhood.

Given that transportation costs tend to be lower near the center of urban areas, nonwhite and low-income groups tend to live in areas with relatively high LTC Index scores. Despite this trend, a smaller disparity between scores for different racial or ethnic groups within Dallas exists than throughout the region, where white residents appear more likely to live in areas with LTC Index scores below 40. In Dallas, about 11% of white residents live in areas with LTC Index scores below 40, compared to roughly 4% of the black population and 3% of Hispanics. When looking more broadly at the region, 38% of white residents live in areas with poor LTC Index scores, as opposed to 16% of the black population and 14% of Hispanics. In Dallas, a greater share of the foreign-born, LEP, and low income households reside in census tracts with the highest index scores (above 80) than white households. Persons with disabilities and families with children inside Dallas appear considerably more likely to live in neighborhoods with relatively low transportation costs than their counterparts throughout the region, but a greater share of white households live in the best neighborhoods in Dallas than these protected classes.

Within Dallas very little difference exists among groups in terms of likelihood to live in the lowest transportation cost areas; however, 50% of the Asian/PI population live in census tracts with low transportation cost index scores 80 and higher. The trend toward smaller discrepancies within Dallas alone reflects the fact that most of Dallas has lower transportation costs than the overall region. Within Dallas and the DFW region, all protected groups have better scores than the white population; this likely occurs due to the greater proportion of the white population residing in the suburbs where transportation costs remain higher than in the primary urban cores (Dallas and Fort Worth).

Table 43: Low transportation cost index scores across groups, Dallas

Dallas Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	0	0	0	0	0	0	0	0	0	0	0
10-19	0	0	0	0	0	0	0	0	0	0	0	0
20-29	4	3.4	1.1	0.9	2.6	0.4	0.6	1.2	0.5	0.8	2.4	1.5
30-39	15	8.0	2.8	1.8	4.3	1.4	1.8	2.2	1.0	2.0	4.6	3.9
40-49	42	14.3	15.4	9.2	9.2	7.2	10.0	10.4	7.5	8.1	13.2	13.6
50-59	43	7.8	12.7	18.3	4.1	10.6	11.9	12.5	17.0	14.3	13.6	13.8
60-69	71	16.0	20.3	20.7	11.7	18.5	18.9	17.9	19.4	17.2	18.6	21.9
70-79	75	20.7	20.5	18.1	18.0	22.1	17.4	17.6	16.7	16.8	18.9	20.5
80-99	73	16.4	16.5	15.0	32.3	20.6	20.0	18.7	17.4	20.0	17.0	15.5
90-100	56	13.4	10.7	16.1	17.8	19.1	19.4	19.5	20.4	20.8	11.7	9.3

Table 44: Low transportation cost index scores across groups, North Texas region

Region Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	14	1.6	0.2	0.3	0.1	0.9	1.0	1.0	0.3	0.2	0.8	2.0
10-19	30	3.3	0.6	0.8	0.3	1.5	2.0	1.8	0.6	0.6	1.8	3.2
20-29	107	12.7	4.5	3.8	5.9	4.5	4.9	6.1	2.5	3.9	8.9	8.4
30-39	187	20.6	10.3	9.3	13.7	9.3	10.1	11.6	7.2	9.4	16.9	15.7
40-49	194	15.9	16.9	12.2	14.5	9.9	11.3	12.8	10.5	11.2	15.9	14.6
50-59	195	12.7	15.3	17.8	12.7	13.4	14.1	14.0	16.3	15.3	14.6	14.5
60-69	245	13.3	20.0	23.3	16.8	20.5	20.2	19.4	23.6	21.3	16.8	18.7
70-79	194	10.1	15.5	15.7	15.4	17.8	15.6	14.5	17.1	16.3	12.2	12.3
80-99	156	7.0	12.0	10.8	14.7	14.9	13.9	12.6	13.6	13.9	8.6	8.1
90-100	70	2.8	4.8	6.0	5.9	7.3	6.9	6.3	8.3	7.9	3.5	2.6

Transit Trip Index (TT)

This index estimates the number of transit trips taken by a three-person single-parent family with income at 50% of the median income for renters in the region. Scores are compared with a national distribution and range from 0 to 100. As the TT index increases, residents in that neighborhood are more likely to utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

Trends for the TT index tend to mirror those of the LTC index, although the TT index generally results in lower scores within Dallas and the region. Within Dallas, the percentage of every racial or ethnic group within each band of scores appears similar; however, in Dallas, almost 18% of the white population lives in census tracts with low transit trip index scores of 39 or less and none of the protected classes have a higher percentage. In the DFW region a larger percentage (43%) of the white population lives in low TT score areas when compared with nonwhite groups (20% or less). Dallas consistently outperforms the region across all groups because transit serves more of the jurisdiction than many other parts of the region. The stronger performances of the protected classes likely result from the greater proportion of the white population residing in the suburbs and rural areas, where transit service may not be available, rather than the primary urban cores (Dallas and Fort Worth).

Table 45: Transit trip index scores across groups, Dallas

Dallas Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
10-19	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
20-29	7	3.5	0.5	0.7	1.8	0.6	0.9	1.1	0.3	0.6	1.8	1.4
30-39	40	14.2	12.6	10.0	8.9	6.5	9.0	10.0	7.8	8.5	13.5	12.3
40-49	121	33.8	33.8	34.5	21.7	27.0	28.6	30.4	30.9	28.4	33.2	36.8
50-59	102	23.7	24.8	27.1	26.1	28.7	25.1	23.5	26.9	25.8	24.9	26.9
60-69	63	13.9	18.0	13.9	25.3	21.0	19.2	17.8	16.4	18.2	15.6	14.8
70-79	45	10.7	10.1	13.6	15.1	15.5	16.4	17.0	17.4	17.9	10.7	7.6
80-99	1	0.2	0.2	0.3	1.1	0.6	0.8	0.3	0.3	0.6	0.3	0.1
90-100	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 46: Transit trip index scores across racial/ethnic groups and families with children, North Texas region

Region Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	40	4.2	0.6	1.0	0.5	2.0	2.3	2.2	0.7	0.8	2.3	4.0
10-19	20	2.0	0.4	0.6	0.6	0.8	1.0	1.2	0.4	0.5	1.2	1.5
20-29	136	15.6	4.4	5.6	3.3	7.4	8.0	8.9	3.4	4.0	10.3	12.2
30-39	228	20.8	15.6	13.8	15.9	12.1	12.9	14.3	11.3	12.9	18.5	17.2
40-49	450	31.5	37.6	34.4	35.3	28.7	30.3	31.2	32.5	32.8	34.6	32.7
50-59	315	16.8	24.4	27.6	26.9	27.2	25.2	23.7	30.2	28.1	21.0	21.6
60-69	145	6.7	12.2	11.3	13.2	15.0	13.6	12.7	13.7	13.5	8.9	8.3
70-79	57	2.3	4.7	5.7	4.0	6.5	6.5	5.8	7.8	7.2	3.2	2.5
80-99	1	0.0	0.1	0.1	0.2	0.2	0.2	0.1	0.1	0.2	0.1	0.0
90-100	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

ii — *For the protected class groups on which HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.*
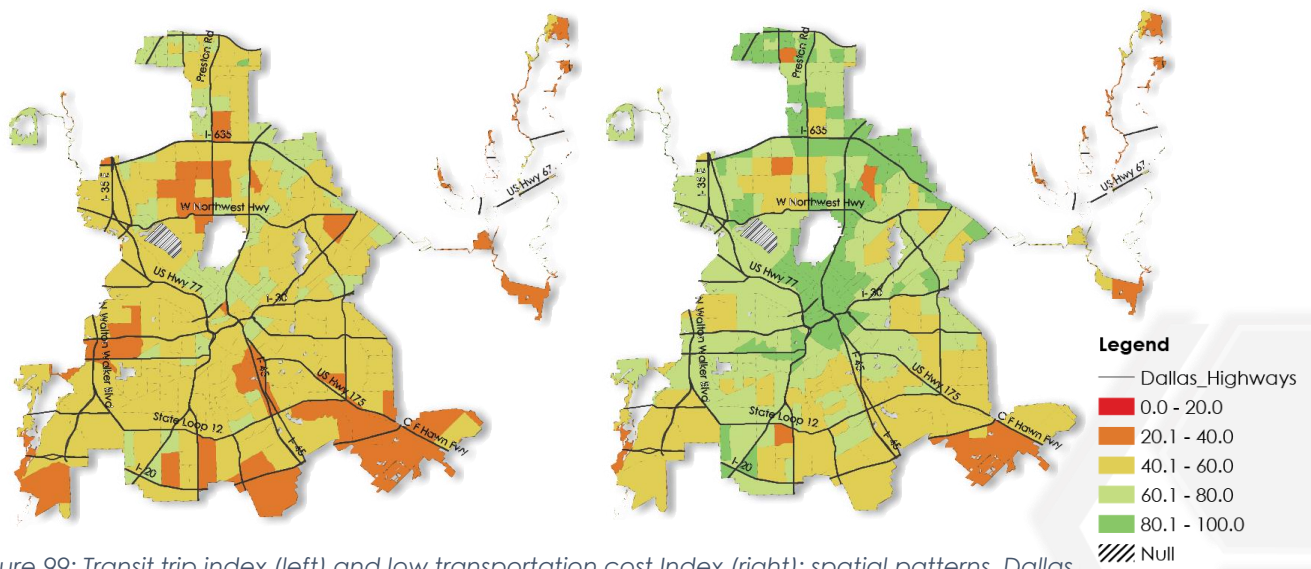
Figure 99: Transit trip index (left) and low transportation cost Index (right): spatial patterns, Dallas

Low transportation cost index: Most of Dallas has relatively strong transportation cost index values. As expected, the values increase away from the highways. The lowest performing census tracts occur in southeast Dallas as well as a few in northwest Dallas; the low-scoring areas of Lake Highlands coincide with a R/ECAP. Meanwhile, many high-performing census tracts occur in far northeast Dallas, which coincides with higher black and Hispanic segregation. Other areas with very high scores include far north Dallas, downtown, Oak Lawn, north Oak Cliff along SH 180 and Old East Dallas.

Transit trip index: Most of Dallas has rather moderate transit accessibility. Some of the low-performing census tracts coincide with the highest concentration of Hispanics in Dallas; however, other low-performing census tracts occur in predominantly white north Dallas. Far northeast Dallas, Love Field, Oak Lawn and Old East Dallas have some neighborhoods with higher scores.
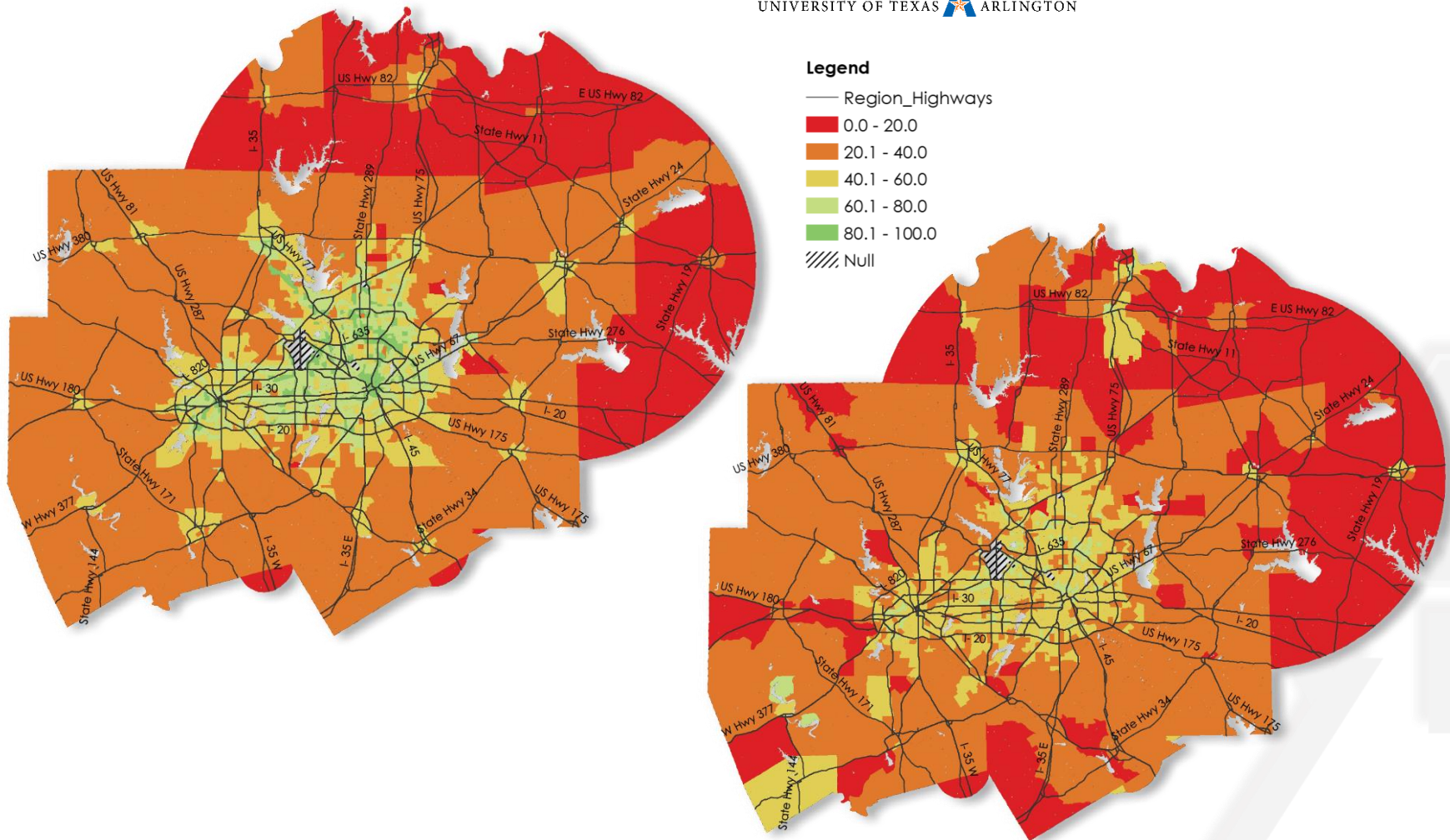
Figure 100: Low transportation cost index (right) and transit trip index (left): spatial patterns, North Texas region

At the regional level, the transit trip index reveals trends similar to the low transportation cost index. For this index, locations near transit service and the urban core appear to have higher scores than rural areas. Suburban areas have low scores. This index produces some unusual results where some locations without transit service (i.e. Arlington) receive moderate scores.

At the regional level, the LTC index also shows clear trends. For this index, locations near freeways and the urban core appear to perform significantly better than rural areas. Within suburban areas, portions of Collin and Rockwall counties have low scoring census tracts; however, most of the lower scoring areas occur beyond the most developed and populated areas of the region.

Comments received through public engagement identified the **lack of access to transportation** as one of the top contributing factors to disparities in access to opportunity, along with the issue of discrimination, lack of investments and the resulting impediments to mobility. The NTRHA team developed a short survey to assess, among other things, respondents' transportation priorities and level of satisfaction. The survey asked:

a. *What public transportation characteristics are the most important to you?*

- *Affordability*
- *Reliability*
- *Accessibility (near house and work)*

- *Serviced areas*
- *Hours of services*
- *Time to reach destinations*
- *I do not use public transit*

More than 1,500 short surveys were filled. The **affordability of public transit** (question a) received the most answers (n=470) and was primarily ranked as being of highest importance (61%).

Transportation Affordability for Housing Choice Voucher Families

A study conducted by Igoufe, Mattingly and Audirac (2018) at the University of Texas at Arlington examined the extent to which HUD-assisted families (HCV) face cumulative barriers to affordable transportation options. The assessment looked at both private and public transportation options[11].

Using granular household-level data, the authors found that, after meeting all non-transportation needs (food, clothing, healthcare) a large share of HCV families face severe transportation affordability challenges that threaten their ability to meet basic needs and achieve upward mobility. For these families, transportation is out of reach not only financially but spatially as they do not reside near transit. In addition, while some families reside near transit, a majority do not have sufficient resources to travel via transit, even when only the head of household needs to commute.

The following graphs respectively show the HCV median income by household size and transportation affordability results.
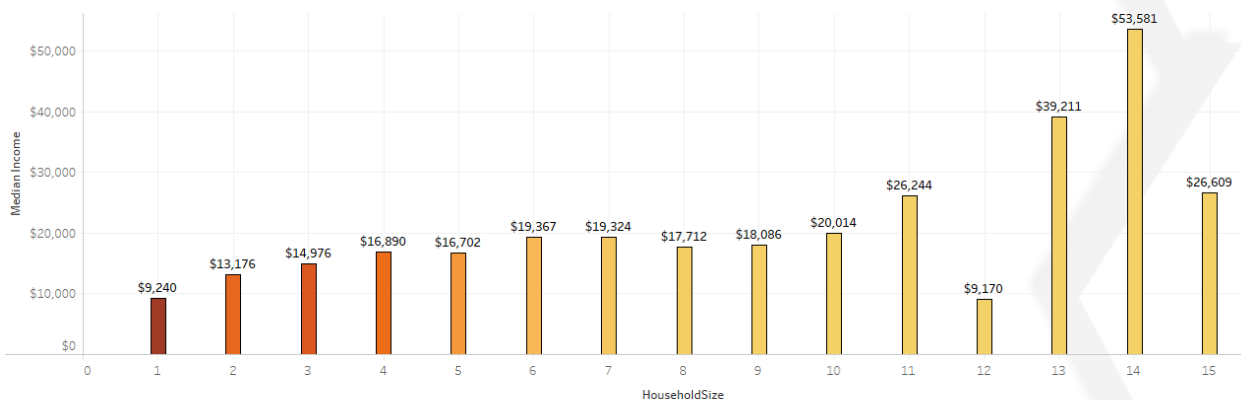
Figure 101: HCV families' median income by household size

---

[11] Sample of 28,195 HCV families served by participating housing authorities in the NTRHA
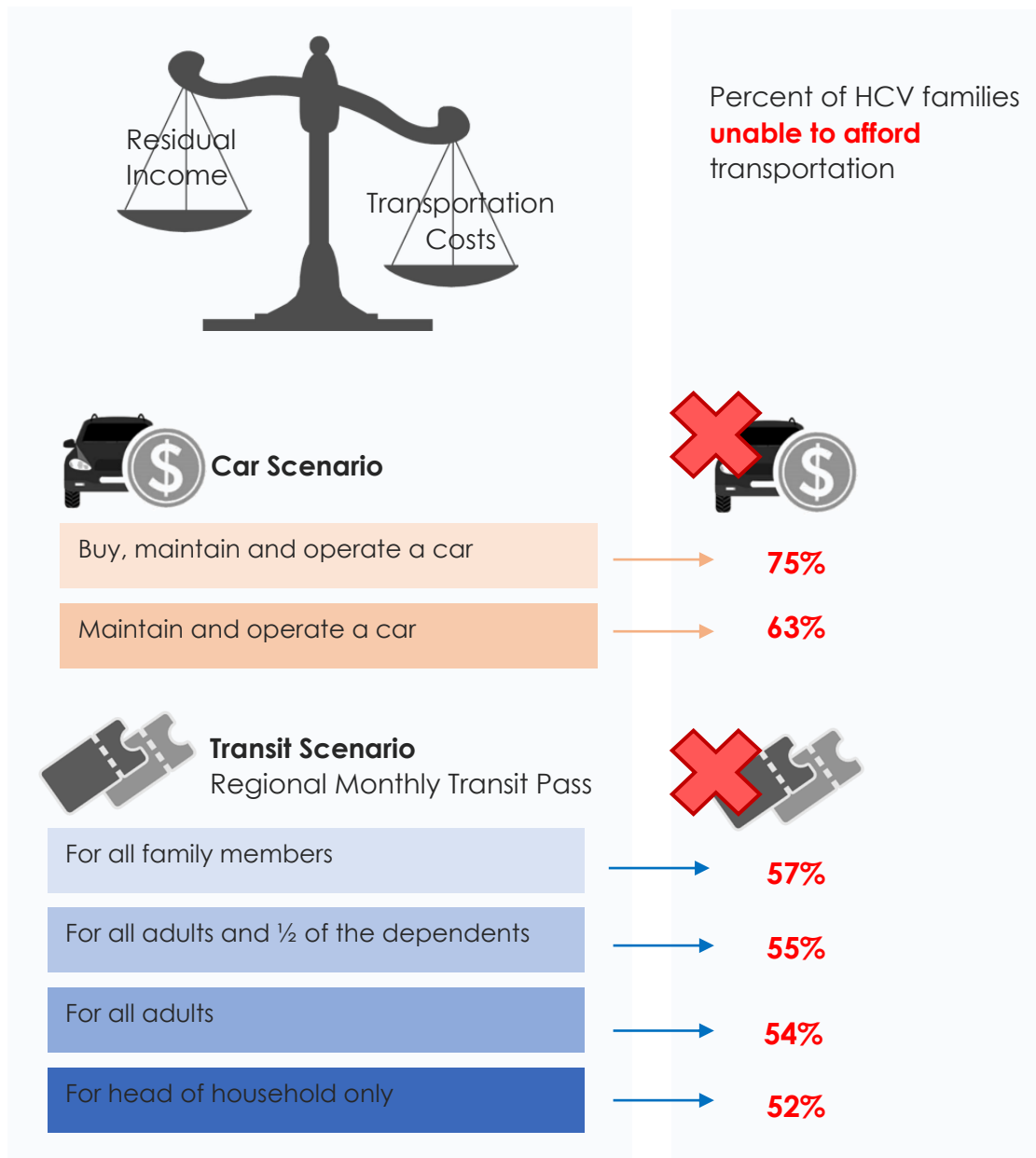
Figure 102: Transportation affordability challenges faced by HCV families (source: Igoufe et al., 2018)

After meeting non-transportation needs (food, childcare), results show that about 75% of HCV families cannot afford to buy, maintain and operate a car, and close to six out of 10 families cannot afford a regional monthly transit pass (each $160 or reduced fare $40). Given the very likely need to travel to access food, school or employment, the results shed light on a potential recourse left to these families to meet their transportation needs: having to forego a nutritious diet, medical care or other necessities.

While the study conducted by Igoufe et al. focuses on HCV families in the region, the results offer critical insight on the barriers to self-sufficiency faced by the extremely and low-income population. While the results provide strong empirical evidence of the barriers to transportation affordability faced by HCV families, they do not capture the costs of longer commuting time and limited destination accessibility associated with public transit vis-a-vis private transportation.

Public Transportation Performance and Access to Employment

The Center for Neighborhood Technology (CNT) has created an analytical platform using a wealth of transportation-related data to assess the relative performance, quality and impacts of public transit. Among others, CNT developed employment-related metrics to gauge the relative level of access to jobs for workers.

The following map shows the number of jobs accessible within a 30-minute transit commute by workers with monthly earning greater than $3,333. The darker the shade (blue) the lower the number of jobs accessible within that commute time. The southern sector of Dallas, northwest and far east Dallas have significantly lower access to jobs (in numbers) than the rest of the City. Greater access to higher paying job by transit is found around the Central Business District (downtown) and north of the Park Cities.

While more than 92% commuters live near transit (within half a mile), only 4.7% commute via public transportation. Importantly, proximity to transit does not always translate into transit usage, nor transportation affordability (Smart & Klein, 2018). In other words, it is possible that low-income households living near transit are unable to commute to work or use other mode of travel.

Key facts:

- An estimated 10% of households (46,627) who live near transit own no vehicles
- A regional monthly transit pass costs $160
- Jobs near transit are primarily in health care and social assistance and require some college or associate degree
- Jobs ($3,333/month) are not equally accessible by transit within the City
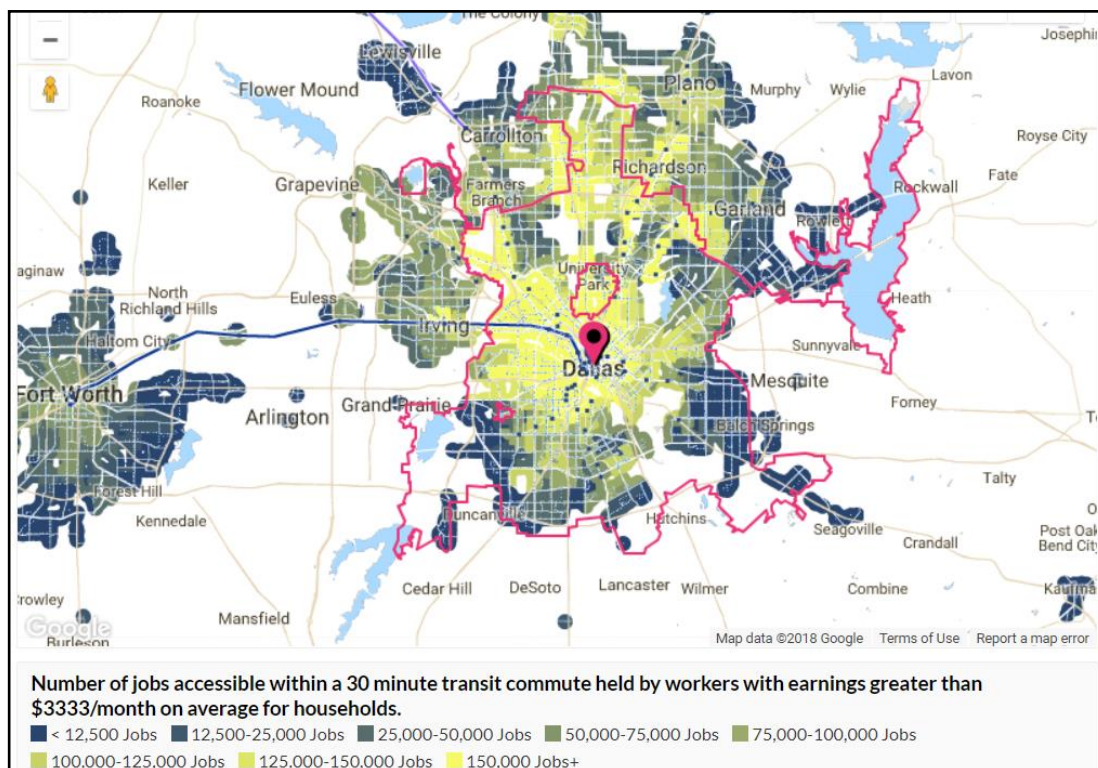
Figure 103: Number of jobs with earnings greater than $3,333/month accessible within a 30min commute by transit (Source: CNT)

JOBS NEAR TRANSIT IN DALLAS, TX

93.9%

Percent of jobs near transit

785,901 of **836,594** total jobs in Dallas, TX are within ½ mile of transit.

Top 3 Jobs Near Transit by Type:

109,583 Health Care and Social Assistance

98,384 Information, Professional, Scientific, and Technical Services

84,785 Management of Companies and Enterprises, Administrative and Support and Waste Management and Remediation Services

Jobs Near Transit by Educational Attainment:

185,959 Bachelor Degree or Advanced

196,492 Some College/Associates Degree

147,220 High School

92,966 Less than High School

TRANSIT ACCESS TO JOBS WITHIN A 30 MINUTE COMMUTE

184,638

Jobs accessible by transit

Total number of jobs accessible from the average household in Dallas, TX within a 30 minute transit commute.

Transit Access to Jobs by Type:

Arts, Entertainment, and Recreation, Accommodation and Food Services (18,469 jobs)

Construction, Utilities, Agriculture, Forestry, Fishing and Hunting, Mining, Quarrying, and Oil and Gas Extraction (9,655 jobs)

Educational Services (18,115 jobs)

Finance and Insurance, Real Estate and Rental and Leasing (21,559 jobs)

Health Care and Social Assistance (23,621 jobs)

Information, Professional, Scientific, and Technical Services (29,135 jobs)

Management of Companies and Enterprises, Administrative and Support and Waste Management and Remediation Services (17,327 jobs)

Manufacturing (6,434 jobs)

Public Administration and Other Services (13,921 jobs)

Retail Trade (13,695 jobs)

Wholesale Trade, Transportation and Warehousing (12,707 jobs)

VEHICLES BY OWNERSHIP: Households within ½ mile of transit that own vehicles.

No Vehicles

10%

46,627 households
within ½ mile of transit own no vehicles.

compared to 48,205 or 10% for this location

1 Vehicle

44%

195,886 households
within ½ mile of transit own 1 vehicle.

compared to 207,229 or 43% for this location

2+ Vehicles

46%

202,554 households
within ½ mile of transit own 2 vehicles.

compared to 223,927 or 47% for this location

Figure 104: Access to Jobs: performance metrics (Source: CNT)

C. *Access to Low Poverty Neighborhoods*

i. *For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.*

Low Poverty Neighborhoods

The low poverty (LP) index captures poverty in a given neighborhood. Its values are inverted and percentile ranked nationally with a range from 0 to 100. A higher score indicates less exposure to poverty in a neighborhood. The index is based on the number of residents with incomes below the federal poverty level.

Inside Dallas, over two-thirds of both the black and Hispanic populations live in neighborhoods with LP index scores below 30 while less than 19% of the white population and about 26% of the Asian/PI population live in similar tracts. While black and Hispanic residents remain more likely to live in areas with low LP Index scores throughout the region, the extent of the imbalance does not appear as extreme. Roughly 43% of black residents and 50% of Hispanics live in neighborhoods with LP Index scores below 30 while about 13% of both the white and Asian/PI populations live in similar neighborhoods.

On the other end of the spectrum, roughly 51% of Dallas' white population and 43% of its Asian/PI population live in neighborhoods with LP index scores of at least 70 while about 11% of the black population and 9% of the Hispanic population live in these low-poverty neighborhoods. Disparities seem less pronounced when looking at the Metroplex, but the same general patterns hold true. As a whole, these numbers emphasize the concentration of poverty along racial and ethnic categories within Dallas and across the entire region.

Table 47: Low poverty index scores across groups, Dallas

Dallas Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	65	4.3	28.2	20.6	7.8	29.8	21.2	15.0	22.8	19.7	15.5	20.0
10-19	71	7.6	24.0	34.8	9.1	27.0	28.7	25.4	37.5	30.9	23.8	21.9
20-29	39	6.6	15.0	14.6	9.5	12.1	14.1	13.8	13.6	13.2	11.4	13.7
30-39	31	6.7	8.4	8.1	7.9	7.1	8.0	8.4	7.1	8.1	7.4	7.2
40-49	19	7.0	4.2	4.8	2.8	4.4	5.1	6.1	3.6	4.0	4.9	5.8
50-59	22	8.1	6.1	4.1	6.4	5.0	5.2	6.7	4.1	4.8	5.2	5.8
60-69	23	8.5	3.4	4.2	13.6	4.5	5.1	6.7	4.0	5.8	5.7	5.0
70-79	26	11.3	3.3	3.1	12.7	3.0	4.2	5.2	2.6	4.1	6.1	5.3
80-99	31	15.5	4.4	2.8	15.0	4.2	4.3	6.1	2.4	4.8	7.5	6.9
90-100	52	24.5	3.0	2.9	15.1	2.8	4.1	6.5	2.3	4.6	12.5	8.5

A large percentage of Dallas' low-income residents live in high-poverty areas. Even among individuals at 80% of AMI, over 54% live in areas with LP index values below 30, as opposed to just under 18% in areas with values of at least 70. In Dallas, 51% of families with children live in census tracts with poverty index scores lower than 30 while only 27% of families with children in the region live in census tracts with similar scores. For the other protected groups (LEP, foreign-born and individuals with disability), a similar trend occurs where the DFW region consistently outperforms Dallas. Within Dallas, the LEP population has the greatest share (74%) of all population groups living in areas with LP index values below 30, and the smallest share (7%) living in neighborhoods with LP scores of at least 70. This pattern repeats for the LEP population at the

regional level with 54% living in areas with LP index values below 30; within the region, a greater share of the LEP population resides in neighborhoods with LP scores of at least 70 than some of the other population groups like those experiencing extremely low income. In Dallas and the region, the white population consistently and significantly outperforms all other protected classes except Asian/PI.

Table 48: Low poverty index scores across groups, North Texas region

Region Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	126	1.9	16.5	14.6	3.0	18.5	12.4	8.0	16.5	12.6	6.9	9.0
10-19	167	5.5	16.0	22.3	5.0	20.1	18.4	14.6	24.3	18.3	11.5	13.3
20-29	122	6.0	11.8	13.4	5.4	12.2	12.5	11.2	13.1	11.6	8.5	10.5
30-39	135	9.3	10.0	10.6	6.4	10.9	12.3	11.2	10.2	9.6	9.0	10.9
40-49	119	8.9	8.0	8.4	5.6	8.6	9.3	9.9	7.5	7.2	8.1	9.8
50-59	109	9.1	7.2	5.9	6.0	7.2	8.0	9.1	5.3	5.9	7.3	8.7
60-69	127	11.5	7.1	6.4	12.1	7.4	8.2	9.6	6.1	7.9	9.4	9.4
70-79	126	13.2	8.3	6.9	14.7	6.3	7.0	9.1	6.1	8.1	11.1	9.5
80-99	157	15.5	7.4	5.9	18.7	5.3	6.5	9.0	5.6	8.9	12.6	9.2
90-100	205	18.9	7.7	5.6	23.1	3.6	5.3	8.3	5.2	9.9	15.5	9.7

> **i**   *For the protected class groups on which HUD has provided data, describe any disparities in access to low-poverty neighborhoods in the jurisdiction and region.*

According to Figure 105, Dallas has a large number of locations with low scores on the LP index (0.0 to 20.0). High-scoring census tracts occur throughout north Dallas; however, pockets of low-scoring tracts also occur, with the lowest scores concentrating in far northeast Dallas and Lake Highlands; some of these also coincide with existing R/ECAPs and indicate that many of these census tracts have the potential to become R/ECAPs. The Mountain Creek tract with a moderate LP score also has a moderate percentage of renters. The locations with low and very low index scores closely follow the previously acknowledged patterns of segregation with low scores occurring throughout west, east and south Dallas. Since this pattern follows the white vs. nonwhite segregation figure, poverty appears to have a relationship with nonwhite segregation levels in Dallas. Oak Cliff has a few census tracts with moderate or higher scores, which may indicate emerging areas of opportunity.

Regionally, Figure 105 shows that the LP index has clear trends. The low poverty indices for Dallas and Fort Worth show that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have low scores. The suburban areas within the NCTCOG planning area have the highest LP scores; however, limited concentrations of low-scoring census tracts occur in most suburbs. Rural index scores appear to vary more for this index than other indices, but the exurban areas appear to perform above average. Rural areas east and southeast of Dallas have lower scores than other rural areas.

Legend

— Dallas_Highways

■ 0.0 - 20.0
■ 20.1 - 40.0
■ 40.1 - 60.0
■ 60.1 - 80.0
■ 80.1 - 100.0
▨ Null

Legend

— Region_Highways

■ 0.0 - 20.0
■ 20.1 - 40.0
■ 40.1 - 60.0
■ 60.1 - 80.0
■ 80.1 - 100.0
▨ Null
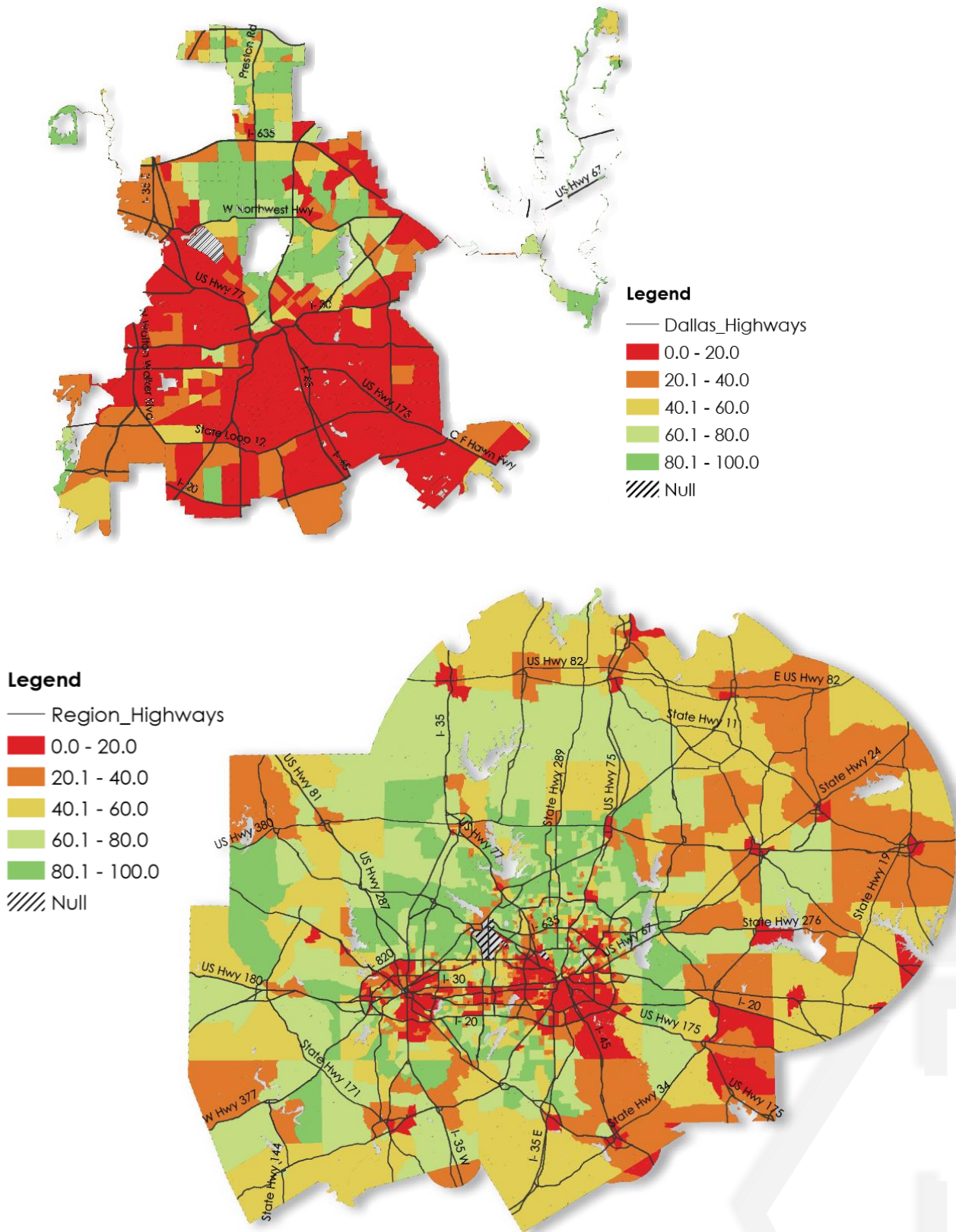
Figure 105: Low poverty index: spatial patterns Dallas and North Texas region

Background

An examination of current fair housing challenges and inequities, notably as they relate to poverty and segregation, requires critical considerations of past policies and practices. In the book "The Color of Law," Richard Rothstein, a Fellow of the Economic Policy Institute, looks at the local, state and federal policies that mandated segregation and inevitably shaped the landscape of housing and opportunity for generations to come.

In the following excerpts from a series of NPR[12] interviews, Rothstein highlighted some of these policies and practices, which have negatively affected residential patterns.

- **Redlining:** The Federal Housing Administration, which was established in 1934, furthered segregation by refusing to insure mortgages in or near African American neighborhoods.

- **Zoning laws**: Neighborhoods that once had African American residents were rezoned to permit industrial and toxic uses. Those rezonings turned those neighborhoods into slums.

- **Government regulations**: The Underwriting Manual (1946) of the Federal Housing Administration:

  - Recommended that highways would be a good way to separate African American from white neighborhoods.
  - Stated that "incompatible racial groups should not be permitted to live in the same communities".
  - "Properties shall continue to be occupied by the same social and racial classes."
  - "Appraisers are instructed to predict the probability of the location being invaded by . . . incompatible racial and social groups."

- **Loss of equity generation and appreciation**: African American families who were forbidden to buy homes in suburbs from the '40s to the '60s were prevented from accruing equity, which could have been passed to their children.

- **Public housing to be predominantly black and poor:** White and black families lived in separate public housing projects. The subsidized development of white-only suburbs led to the depopulation of public housing of white families, leaving housing authorities

Rothstein's work offers invaluable lessons and context to comprehend the magnitude of fair housing challenges faced by vulnerable communities. It not only highlights the systemic and persisting negative impacts that regulatory decisions have had on families and communities, but it sheds light on potential alternatives to address inequities through policy actions.

---

[12] https://www.npr.org/2017/05/17/528822128/the-color-of-law-details-how-u-s-housing-policies-created-segregation
https://www.npr.org/2017/05/03/526655831/a-forgotten-history-of-how-the-u-s-government-segregated-america

Current policy/regulatory context

- ▪ Source of Income Discrimination

The ability of Housing Choice Voucher (HCV) families to secure housing in integrated, low-poverty, opportunity-rich neighborhoods is not only affected by market constraints, but by the use and access to information, as well as by discrimination. Research suggests that voucher holders would like to move to higher-opportunity neighborhoods but often are unable to do so (Tighe, Hatch and Mead 2017). A reason for their inability to access opportunity-rich neighborhood is that in most cities and states, laws allow landlords to refuse vouchers. Texas law (TX LOCAL GOVT § 250.007) forbids local governments from protecting housing voucher recipients.

As discussed in the preceding sections (**Segregation**) and leveraging results from a survey conducted by Daniel and Beshara, P.C., a series of analyses show that:

- the surveyed landlords refusing vouchers tend to be disproportionately located in neighborhoods with a significantly greater share of white population than the city average
- surveyed landlords accepting vouchers are primarily located in racially segregated census tracts
- correspondingly, HCV families tend to disproportionately reside outside of neighborhoods in which the surveyed landlords refuse vouchers

More than 91% of the 764 landlords[13] refusing vouchers are located <u>outside</u> Racially/Ethnically Concentrated areas of Poverty (R/ECAPs). The average poverty rate of the census tracts in which these landlords are located is about 17%. On the other hand, an estimated 28% of the HCV families (3,000 families) residing in Dallas are located in R/ECAPs, with an average of 83 HCV families per R/ECAP. Hypothetically, if each of these landlords would house four HCV families, no HCV family would be residing within a R/ECAP in Dallas.
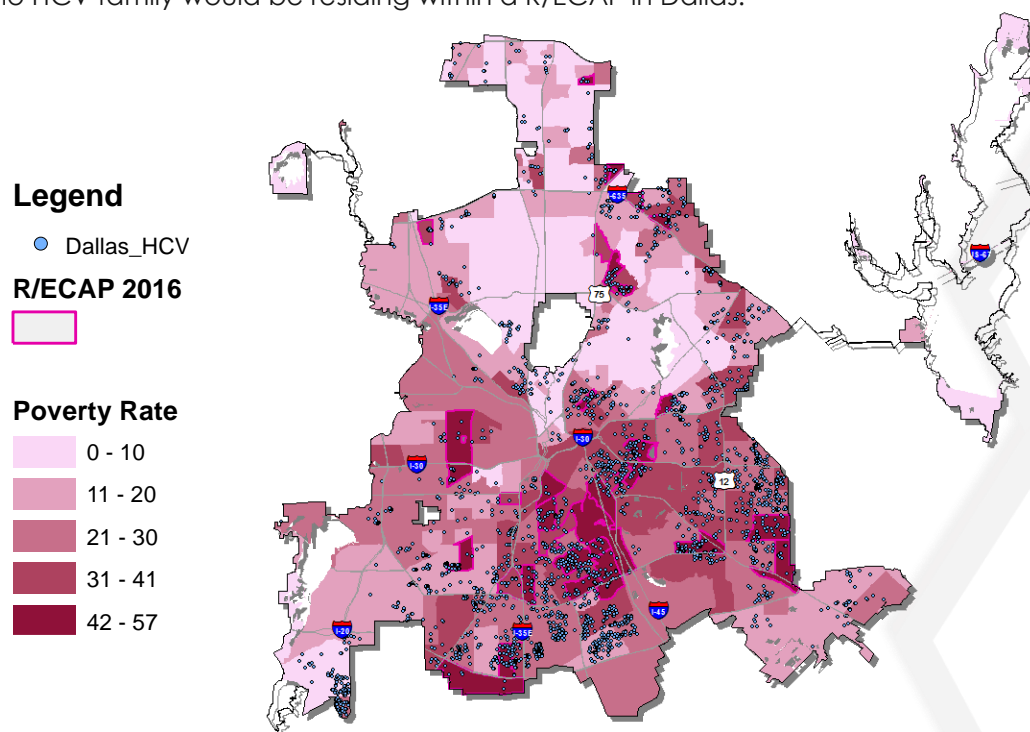
Figure 106: HCV residential patterns with respect to poverty rate and R/ECAPs

---

[13] successfully geolocated by NTRHA research team based on survey raw data

- <u>Small Area Fair Market Rent (SAFMR):</u>

Policy analysts and advocates alike have long criticized the conventional method of deriving Fair Market Rent (FMR) on a region-wide basis as it prevents voucher holders from renting in more expensive, opportunity-rich neighborhoods. This effectively forces voucher households into neighborhoods with higher poverty rates (Matthew, Reeves, & Rodrigue, 2017).

As a response, state and local agencies in 23 metropolitan areas were required to adopt Small Area Fair Market Rents (SAFMRs) estimated at the ZIP code level. SAFMRs were first implemented in the Dallas metropolitan area in 2011 following the settlement of fair housing litigation. An evaluation of the SAFMR policy took place in the Dallas region's fifth year on the program and found that voucher families entered neighborhoods with less poverty, unemployment and violent crime. The Dallas metropolitan area, where SAFMRs applied throughout the area and had been in place the longest, saw some of the largest improvements in opportunity for voucher holders. For example, among the **Dallas Housing Authority's** voucher holders who moved from one ZIP code to another, the **share moving to high-opportunity neighborhoods tripled**, from 5% to 15%.

The SAFMR policy is considered a critical tool to unlock access to low-poverty and opportunity-rich neighborhoods for voucher families. However, relying on survey data made available by ICP, further analysis shows that the number of landlords refusing vouchers in the greater Dallas area tends to be significantly larger in ZIP codes with higher FMRs (the two highest quintiles). As an illustration, in Dallas the highest number of landlords refusing vouchers are located in ZIP codes with the highest FMR (downtown and Uptown, as well as Park Cities). Based on the public participation and consultation feedback, as well as the series of analyses conducted by the UTA research team, it appears likely that source of income discrimination is severely undermining access to low-poverty, opportunity-rich neighborhoods located in high FMR ZIP codes.
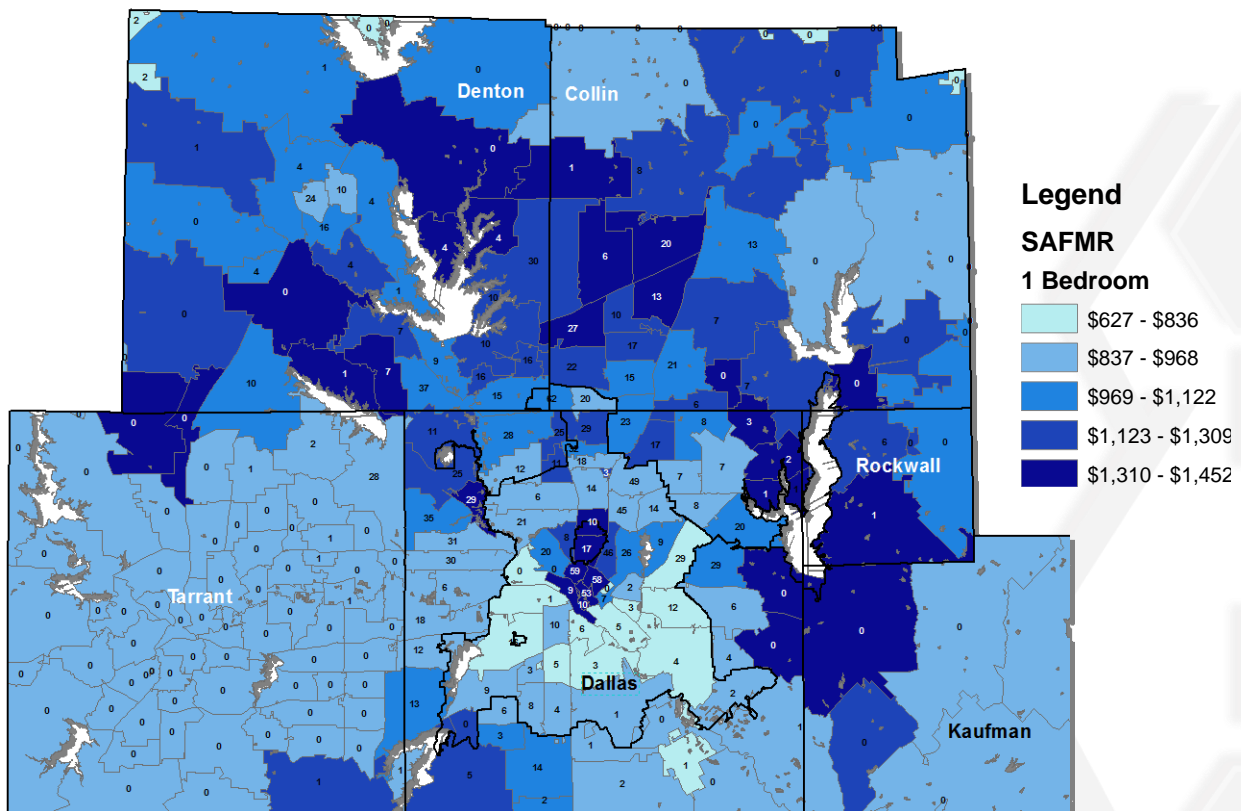
Figure 107: SAFMR and the number of landlords refusing vouchers (label), Greater
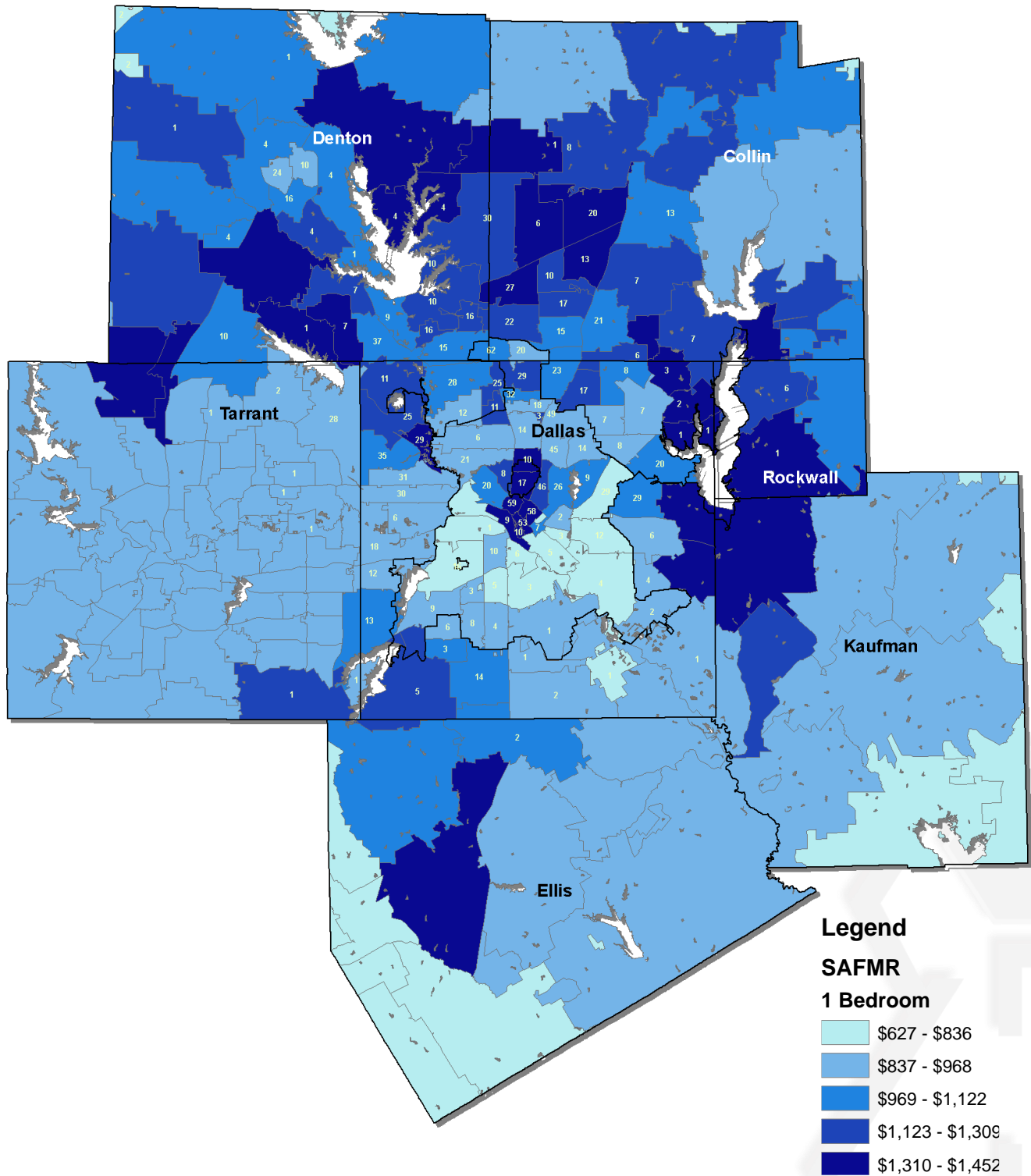
Figure 108: SAFMR and the number of landlords refusing vouchers in Dallas, Colling, Denton, Tarrant, Rockwall, Kaufman and Ellis counties
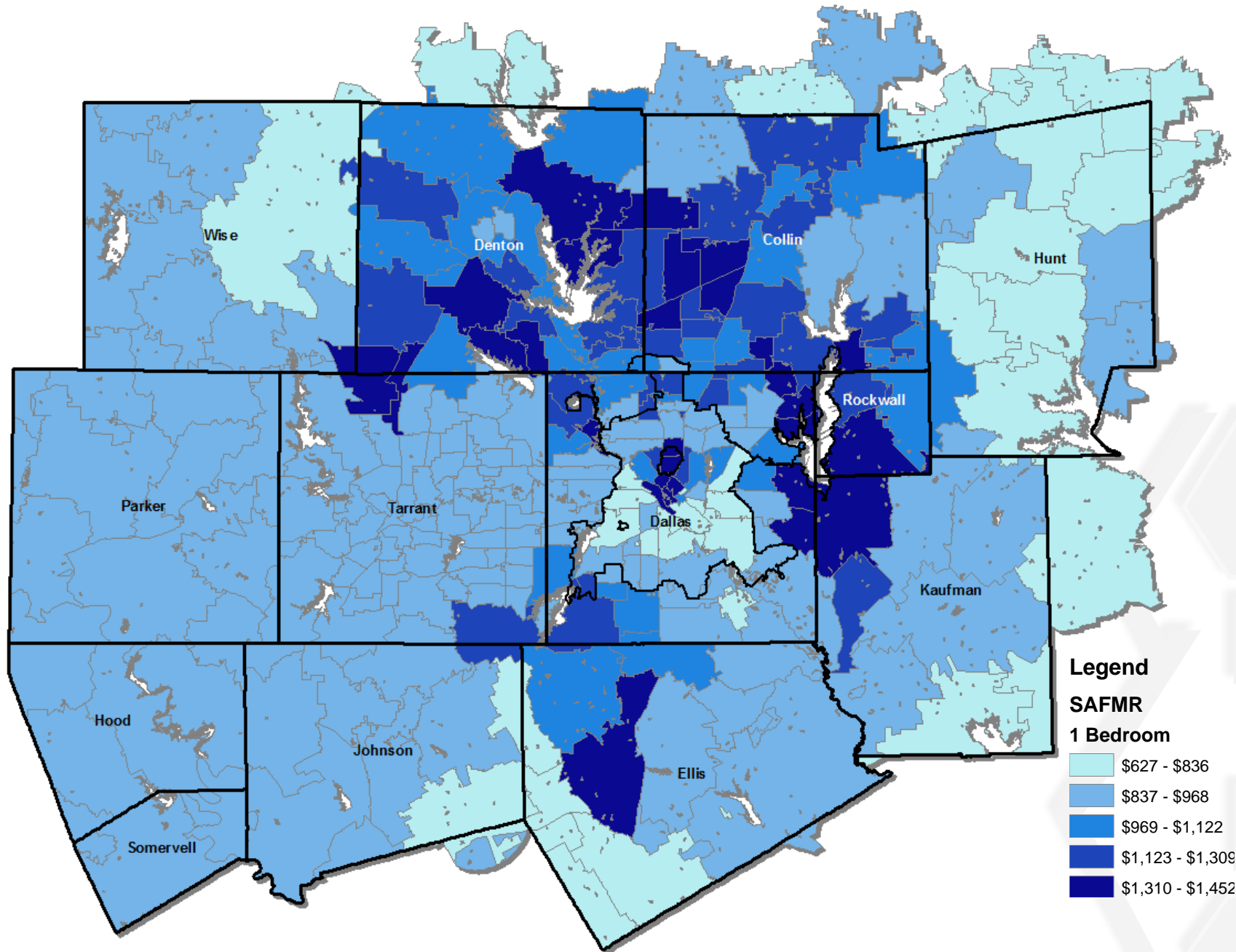
Figure 109: SAFMR and payment standards (DHA)

Mobility Counseling and Moving to Low-Poverty Neighborhoods

A study conducted by the Urban Institute (2005) found that families with vouchers were 52% more likely to move to low-poverty neighborhoods if they received mobility counseling. The Mobility Assistance Program, operated by Inclusive Communities Project (ICP), resulted from the Walker Settlement and serves residents participating in the Dallas Housing Authority's Housing Choice Voucher Program. Mobility assistance typically entails housing search assistance and move-related financial assistance (landlord bonuses, security deposits, utility deposits, moving expenses and application fees). Families are assisted to use vouchers to obtain housing in lower poverty areas in seven counties: Dallas, Tarrant, Collin, Denton, Rockwall, Kaufman and Ellis.

Walker Settlement Voucher holders must move to housing in a Walker Targeted Area, defined as a census tract in which the poverty rate is less than or equal to 22.3%, the black population is less than or equal to 25.7% and where no public housing is located (Inclusive Communities Project, 2013). ICP further assists DHA voucher holders to relocate to High Opportunity Areas, defined as census tracts in which residents have incomes at or above 80% of the Area Median Income, no more than 10% of residents have incomes below the federal poverty rate and public schools meet the standards of the Texas Education Agency and have 4-year graduation rates of 85% or higher.
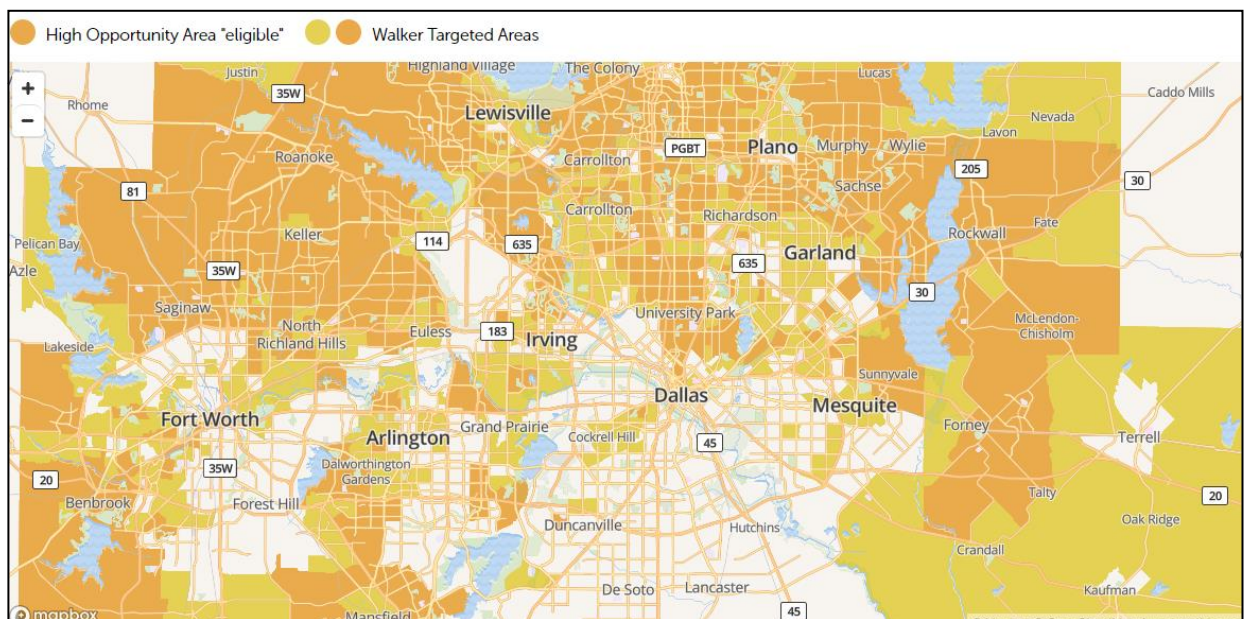
Figure 110: High-opportunity areas and Walker targeted areas (source: ICP)

A report produced by ICP (2013) found that: "Black HCV holders who receive some type of mobility assistance live in higher quality neighborhoods with more opportunity, less distress and less crime. Households that receive multiple types of mobility assistance live in better conditions than households with less mobility assistance. The more mobility assistance a Black household receives, the better the conditions are in the neighborhoods to which they move."

d. ACCESS TO ENVIRONMENTALLY HEALTHY NEIGHBORHOODS

> **i** For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The Environmental Health (EH) Index uses data on hazardous air pollutants that cause cancer or have other serious health effects. It measures exposures and risks across broad geographic areas and generates values from 0 to 100 based on a national distribution of raw scores. As the index value increases, residents experience less exposure to toxins.

Almost 95% of the Dallas census tracts receive scores below half of the census tracts in the United States. While none of the census tracts in the jurisdiction have very high scores, the protected classes have larger proportions of their populations living in the very-low-performing census tracts. About 26% of the black population and 15% of the Hispanic population live in census tracts with environmental health index scores 19 and lower while only 8% of the white and 10% of the Asian/PI populations live in these census tracts. The remaining vulnerable groups all fare more poorly than the white population. In Dallas, about 19% of ami30 and ami50 residents live in census tracts with environmental health index scores 19 and lower, and about 15% of ami80 residents live in the same census tracts. About 13% of families with children and 17% of individuals with disabilities live in these very-low-performing census tracts. The other protected groups (LEP and foreign-born) experience population distributions with respect to the environmental health index similar to the Hispanic populations within Dallas.

Table 49: Environmental health index scores across groups, Dallas

Dallas Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	9	2.3	5.7	2.1	5.2	4.1	3.6	3.4	1.9	2.3	2.6	3.0
10-19	35	5.9	19.9	12.7	4.8	16.3	15.4	12.1	13.7	13.4	10.7	13.8
20-29	82	26.4	24.8	26.1	23.7	28.8	26.9	26.6	30.6	27.8	24.2	24.0
30-39	102	35.6	25.0	34.0	41.5	33.0	31.9	32.4	32.4	34.2	34.8	32.2
40-49	45	18.6	16.3	18.8	13.9	14.0	16.6	17.9	16.2	16.1	17.9	19.0
50-59	11	5.7	6.3	4.8	6.6	3.1	4.5	5.6	4.5	4.6	6.5	5.6
60-69	4	5.4	1.9	1.4	4.4	0.9	1.2	2.1	0.7	1.5	3.4	2.5
70-79	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
80-99	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
90-100	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

The overall region (Table 50) has a lower proportion of the population living in census tracts with very low EH scores than Dallas. Census tracts in the DFW region with environmental health index scores lower than 19 contain 15% of the Hispanic population and almost 16% of the black population but only about 8% of the white and Asian/PI populations. Census tracts in the DFW region with environmental health index scores greater than 60 contain almost 14% of the white population and about 3% of the Hispanic, black and Asian/PI populations. Families with children appear slightly better off at the regional level than Dallas; however, overall they appear better off than all other protected classes at the regional level and not much worse than the white population. The other protected groups (LEP, foreign-born, and disability) experience population distributions with respect to the environmental health index similar to the black and Hispanic populations at the regional level.

Table 50: Environmental health index scores across groups, North Texas region

Region Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	16	1.5	2.7	1.4	1.6	2.6	1.9	1.7	1.1	1.2	1.5	1.9
10-19	91	6.9	13.1	13.6	6.3	13.6	12.4	10.6	13.4	12.6	9.1	10.2
20-29	267	25.1	27.6	29.8	26.9	30.9	29.8	29.4	32.2	29.7	26.6	26.6
30-39	254	24.8	27.5	28.8	27.7	26.9	26.9	26.7	28.6	28.9	27.6	25.2
40-49	144	19.0	16.4	15.8	25.3	13.0	14.9	15.9	15.5	17.4	18.2	16.3
50-59	63	8.5	10.0	6.9	9.3	6.6	6.7	7.9	6.7	7.2	8.9	8.2
60-69	50	11.1	2.2	3.3	2.6	5.1	5.6	6.2	2.1	2.6	6.6	9.1
70-79	20	3.0	0.5	0.5	0.3	1.4	1.7	1.6	0.3	0.4	1.5	2.5
80-99	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
90-100	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

i

For the protected class groups on which HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

Most scores for the environmental health index in Dallas fall below 60. The moderate EH scores occur in Mountain Creek, west Dallas, Lakewood, far east Dallas, south Dallas and southeast Dallas. The lower scores occur along Northwest Highway near Love Field, in and north of downtown, and east and southeast Oak Cliff. Other than the concentration of very-low-performing census tracts in south Dallas, which matches black segregation patterns, the EH index scores do not show a distinctive pattern.

At the regional level, the EH index shows clear trends. First, the analysis remains incomplete because many of the census tracts lack data. Because these scores relate to air pollution and the DFW region remains in non-attainment for ozone, the census tracts in the urban cores and suburbs record low scores. Only rural areas receive higher scores, and none of the census tracts reach the top 20% nationwide.
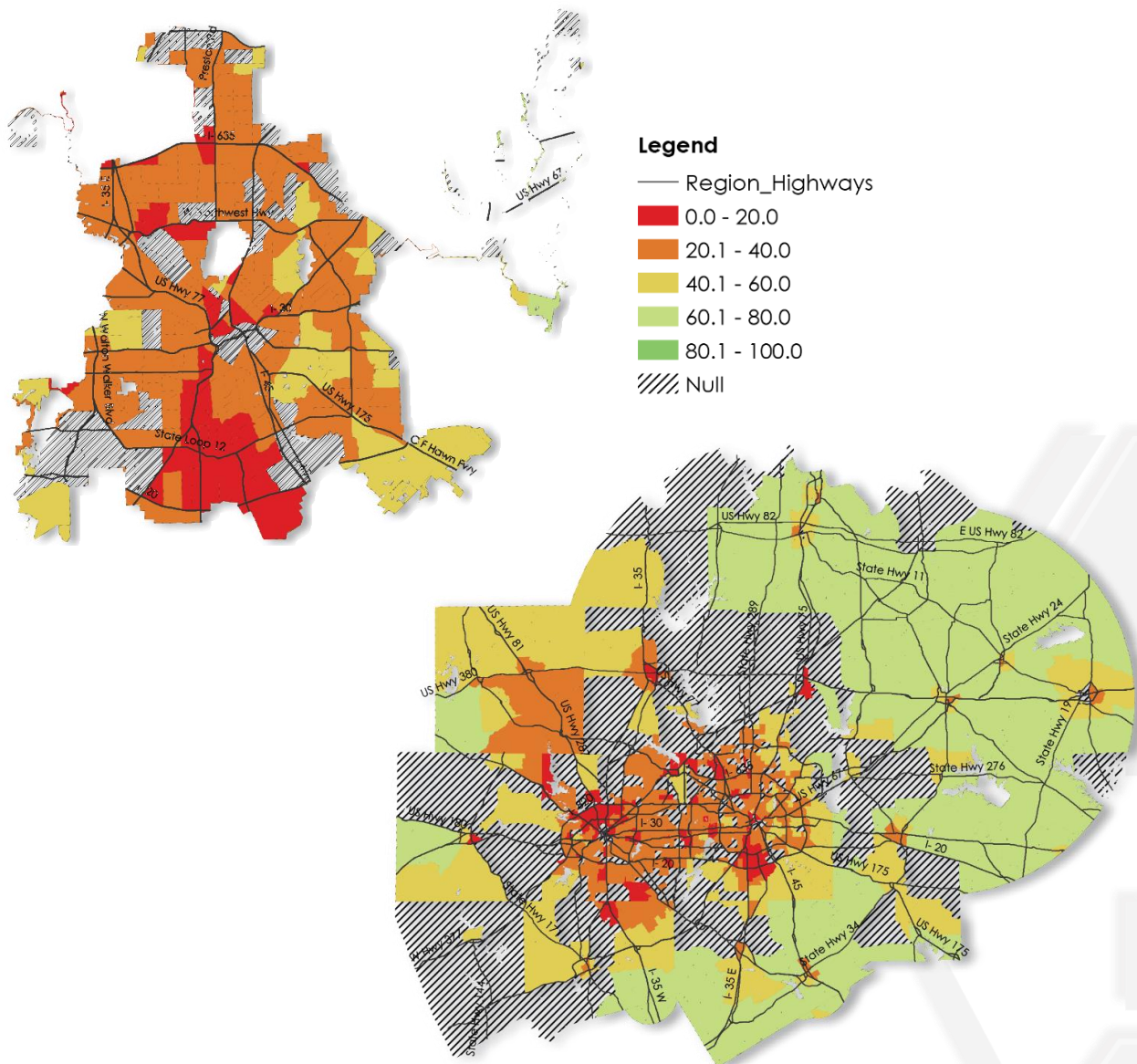
Figure 111: Environmental health index: spatial patterns Dallas and North Texas region

Informed by community participation, any consultation with other relevant government agencies and the participant's own local data and local knowledge, discuss whether there are programs, policies or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

Environmental Factors: Risk, Exposure and Proximity

Public meeting participants and the research all point to hazardous land uses and facilities, as well as the lack of access to transportation, healthcare and grocery stores, as factors perpetuating inequitable access to healthy neighborhoods (see contributing factors to disparities in access to opportunities for greater details on public input).

The U.S. Environmental Protection Agency collects a wide variety of environmental and health-related data on air quality, chemicals and toxic exposure, as well as land, waste and cleanups. The following maps and associated data descriptions are extracted from the EnviroFacts and EJScreen databases and from data documentation maintained by EPA:

- Hazardous Waste Proximity (2017)

Proximity to waste and hazardous chemical facilities or sites: number of significant industrial facilities and/or hazardous waste sites nearby and distance from those: National Priorities List (NPL) sites, Risk Management Plan (RMP) Facilities, hazardous waste Treatment, Storage and Disposal Facilities (TSDFs)

- RMP Proximity (2017)

Facilities producing, using, or transporting substances that pose the greatest risk of harm from accidental releases must file a Risk Management Plan with EPA (Clean Air Act section 112(r)).

- Lead Paint Indicator (2011-2015)

Lead-based paint was banned in the United States by the Consumer Product Safety Commission in 1978, but lead-based paint used in housing before the ban remains a significant source of exposure to lead for children and adults. The percentage of occupied housing units built before 1960 was selected as an indicator of the likelihood of having significant lead-based paint hazards in the home.

- Wastewater Discharge Indicator (2017)

Proximity to toxicity-weighted wastewater discharges.

- NATA Air Toxics Cancer Risk (2011)

Lifetime inhalation cancer risk from the analyzed carcinogens in ambient outdoor air.
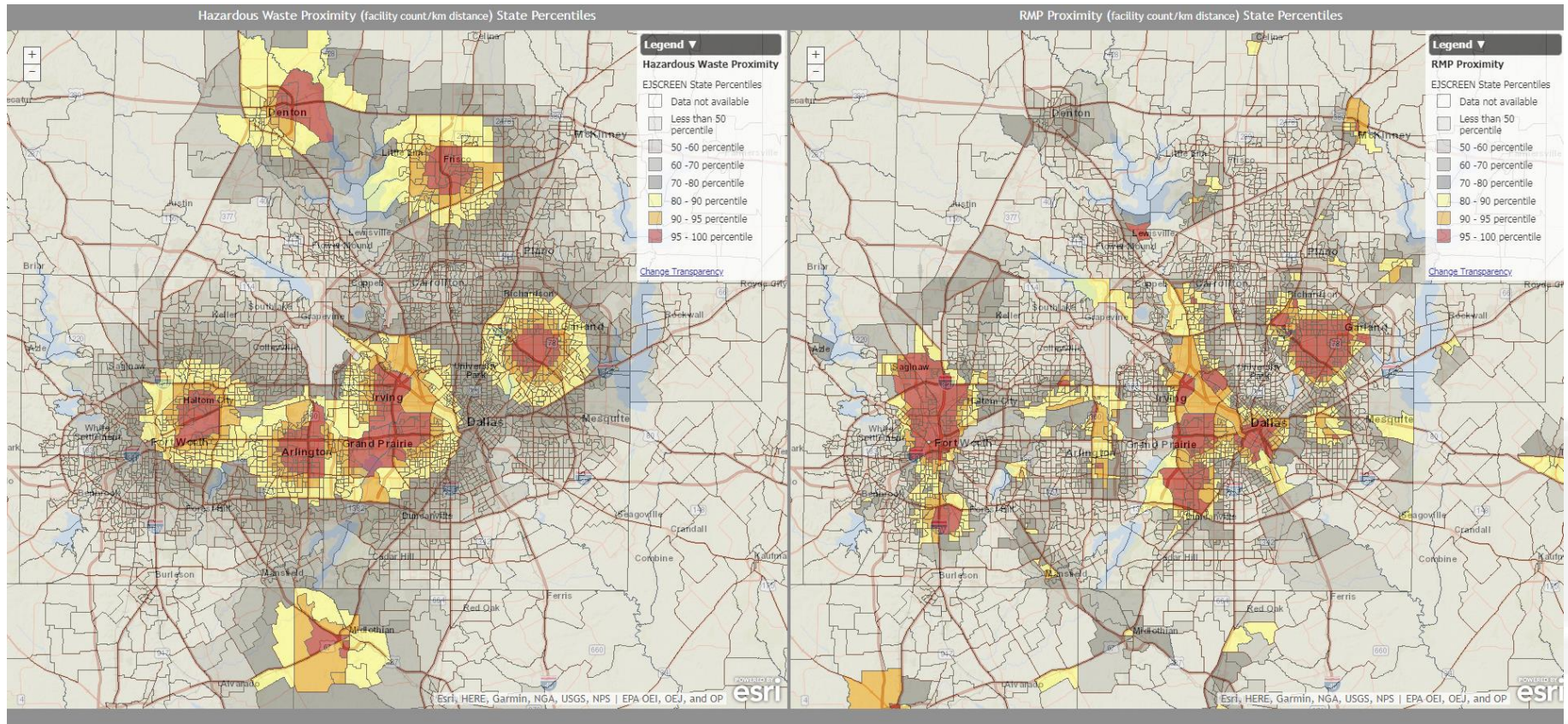
Figure 112: Hazardous waste proximity (right) and RMP proximity (left), North Texas region (source: EJ Screen)

With respect to proximity to waste and hazardous sites and facilities, several places (red and orange shades) in the region stand out as being in the top percentile brackets in the state. These areas include far northeast Dallas and Lake Highlands, west Dallas (extending to Grand Prairie and Irving), as well as Arlington and northeast Fort Worth and Richland Hills. Similar patterns can be found with respect to proximity to RMP facilities. It is notably the case for the far northeast Dallas/Lake Highlands area, as well as west Dallas. Additional locations within Dallas appearing in the highest percentile bracket in the state as well are the Red Bird/west Oak Cliff, Fair Park/south Dallas and Dallas Love Field areas.
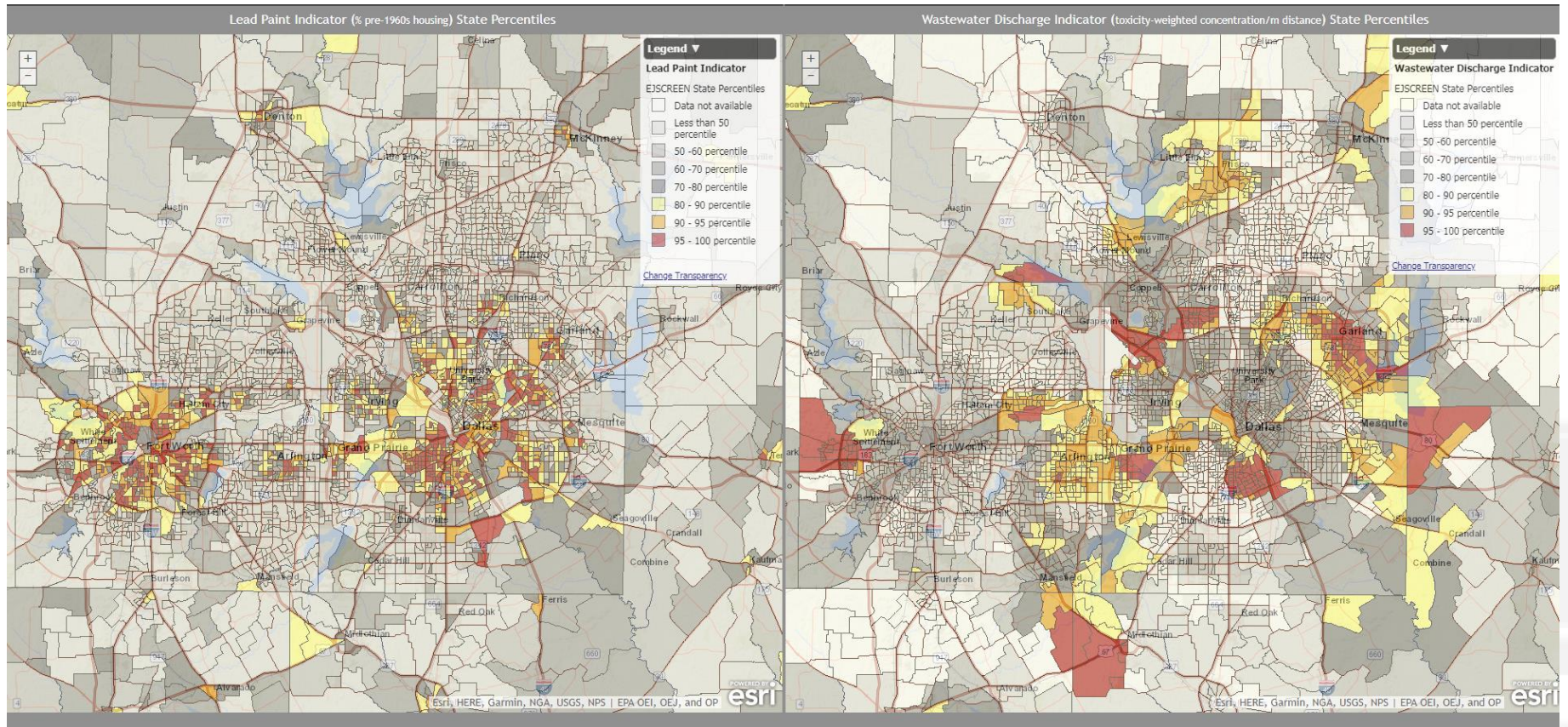
Figure 113: Lead paint (right) and wastewater discharge indicators, North Texas (source: EJ Screen)

The lead paint indicator maps, which show the percentage of occupied housing units built before 1960, reveals a few clusters of block groups falling under the highest percentile brackets. These include the north Oak Cliff/west Oak Cliff area, old east Dallas and far east Dallas. As for the proximity to wastewater discharge, the highest levels in Dallas are found in the east Oak Cliff and south Dallas areas.
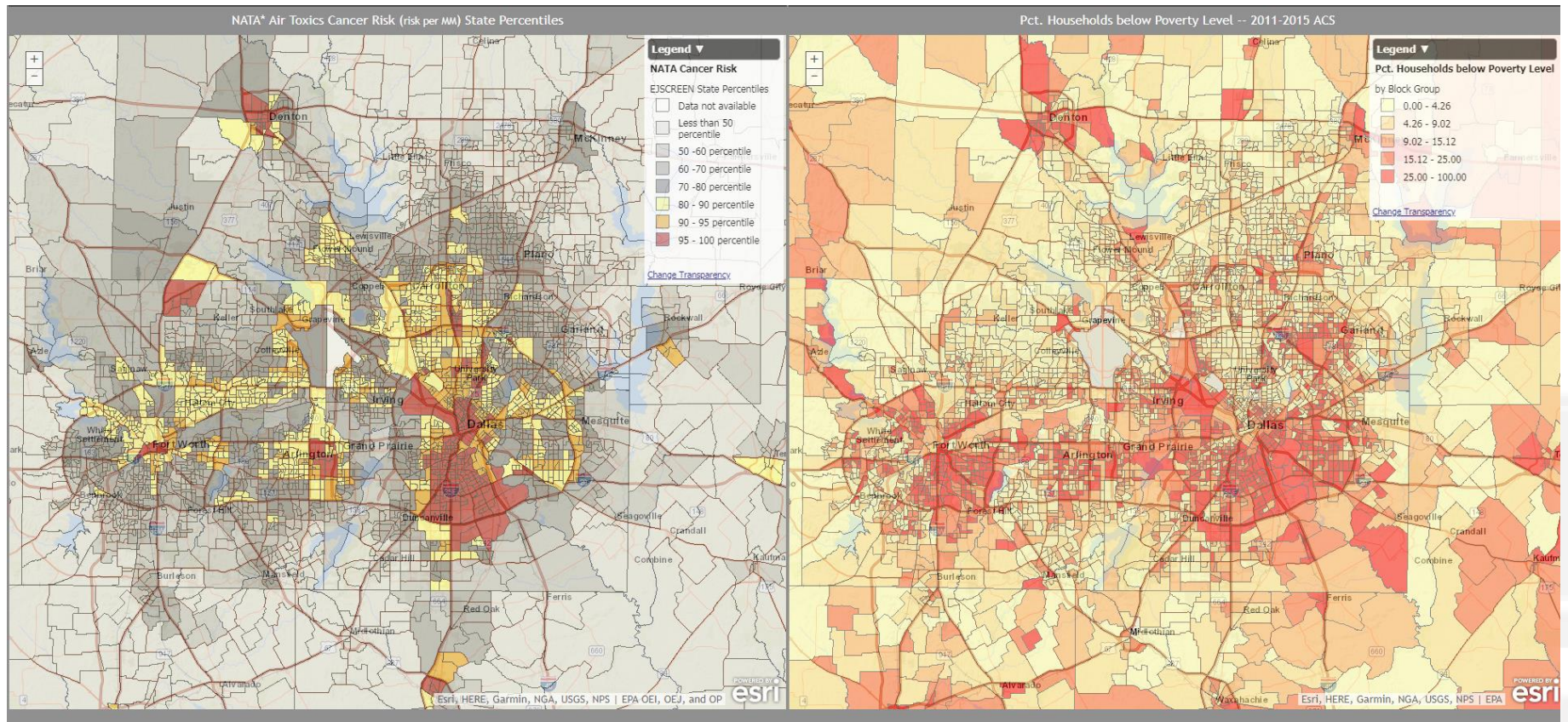
Figure 114: NATA air toxics cancer risk (right) and percent of households in poverty (left), North Texas

Air toxics cancer risk is relatively more prevalent (highest state percentiles, red shade) in the southern sector of Dallas. It also extends to downtown, the Oak Lawn area and northeast Dallas. These patterns are mirrored by the residential living patterns of households living below the poverty line. Areas with relatively higher toxics cancer risks tend to be areas where the concentration of poor households is relatively higher.

Grants awarded to support EPA programs

EPA's management information system for grants programs is the Integrated Grants Management System (IGMS), which awards and administers grants. Grants are regularly awarded to federal, state or local government agencies, universities and other institutions that support EPA programs.

The following table shows the EPA grants awarded to applicants in Dallas and to the North Central Texas Council of Governments (NCTCOG), designated metropolitan planning organizations for the Dallas-Fort Worth area.

Table 51: EPA grants awarded in Dallas: applicant, award value and project start and end date

Applicant Name	Address	Award Date	Cumulative Award	Project Start	Project End
Dallas, Texas					
American Lung Association of the Central States	8150 Brookriver Drive, Suite S102	SEP-29-2009	$39,990	OCT-01-2009	JAN-29-2011
Today Foundation	8150 North Central Expressway, Suite 1900 South Tower	JUL-17-2014	$125,000	JUL-01-2014	DEC-31-2016
Project United Community Development Corporation	5315 Elkridge Dr.	SEP-15-2014	$200,000	OCT-01-2014	SEP-30-2017
Positive Breathing Organization	4907 Spring Ave, Suite #209	SEP-09-2016	$25,000	OCT-01-2016	SEP-30-2018
City of Dallas	1500 Marilla Street	NOV-10-2008	$9,500,000	DEC-01-2008	MAY-29-2013
Southern Methodist University	6425 Boaz Lane, Suite 101	NOV-17-2015	$15,000	SEP-01-2015	AUG-31-2016
Southern Methodist University	6425 Boaz Lane Suite 101	DEC-02-2016	$14,885	SEP-01-2016	AUG-31-2017
U.S. Army Corps of Engineers	Southwestern Division / 1100 Commerce Street	OCT-28-2008	$83,442	OCT-27-2008	APR-30-2010
U.S. Army Corps of Engineers	Southwestern Division / 1100 Commerce Street	MAR-10-2010	-$632	AUG-04-2009	JUN-30-2011
U.S. Army Corps of Engineers	Southwestern Division / 1100 Commerce Street	AUG-18-2009	$7,684,600	AUG-14-2009	JUL-06-2016
U.S. Army Corps of Engineers	Southwestern Division / 1100 Commerce Street	DEC-31-2013	$139,680	JAN-01-2014	DEC-31-2019
U.S. Army Corps of Engineers	Southwestern Division / 1100 Commerce Street	JUN-29-2016	$3,598,400	JUL-07-2016	JUL-06-2023
Texas Discovery Gardens	P.O. Box 152537	SEP-15-2008	$15,000	SEP-19-2008	SEP-30-2009
American Lung Association of the Central States	8150 Brookriver Drive, Suite 102	SEP-15-2008	$39,829	SEP-15-2008	AUG-31-2011
American Lung Association of the Central States	8150 Brookriver Drive, Suite 102	SEP-30-2009	$19,086	OCT-01-2009	OCT-31-2010
		Total	**$21,499,280**	**(2008-2023)**	
North Central Texas Council of Governments (Arlington, Texas)					
North Central Texas Council of Governments	P.O. Box 5888	JUN-03-2010	$500,000	AUG-01-2010	MAR-31-2013
North Central Texas Council of Governments	616 Six Flags Drive	JUN-03-2010	$500,000	AUG-01-2010	MAR-31-2013
North Central Texas Council of Governments	P.O. Box 5888	JUN-03-2010	$500,000	OCT-01-2010	MAR-31-2012
North Central Texas Council of Governments	616 Six Flags Drive	FEB-10-2015	$298,728	FEB-10-2015	JUL-31-2018

North Central Texas Council of Governments	616 Six Flags Drive	JAN-14-2016	$661,834	JAN-01-2016	DEC-30-2018
North Central Texas Council of Governments	616 Six Flags Drive	NOV-30-2017	$2,090,742	JAN-01-2018	DEC-30-2019
North Central Texas Council of Governments	616 Six Flags Dr.	SEP-29-2011	$486,767	SEP-01-2011	OCT-31-2017
North Central Texas Council of Governments	P.O. Box 5888	DEC-19-2008	$2,750	DEC-19-2008	JUL-31-2009
North Central Texas Council of Governments	616 Six Flags Drive, Centerpoint Two	DEC-12-2008	$750,000	JAN-01-2009	DEC-31-2011
North Central Texas Council of Governments	P.O. Box 5888	DEC-12-2008	$750,000	JAN-01-2009	DEC-31-2011
North Central Texas Council of Governments	P.O. Box 5888	JUN-12-2009	$2,188,195	JUN-12-2009	SEP-30-2011
North Central Texas Council of Governments	P.O. Box 5888	JUN-12-2009	$1,550,157	JUN-12-2009	SEP-30-2011
		Total	**$14,300,872**	**(2008-2019)**	

Region and City-led efforts in protecting and improving the environment

In 2012, EPA designated 10 counties (Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant and Wise) as non-attainment because they violated federal standards for having high concentrations of ground-level ozone. In 2018, NCTCOG published an Air Quality Plan, known as the State Implement Plan, to reduce ozone levels to comply with federal standards. Some of the programs in this plan seek to get older cars off the road, utilize technologies to clean up vehicles already on the road, and education programs to improve air quality.

The Office of Environmental Quality in the City of Dallas is at the forefront of several initiatives to improve and protect the environment. These include:

- **Try Parking It**: Try Parking It is a ride-match and trip-logging program available to help participants locate carpool and vanpool matches, along with transit, biking and walking buddy matches.
- **Regional Smoking Vehicle Program (RSVP)**. Residents can report smoking vehicles to RSVP. RSVP also advises vehicle owners of their possible emission problems and offers suggestions on how to repair or replace those vehicles.
- Maintaining a robust **Air Pollution Control Program**
- Upgrading the City fleet to **electric vehicles** and **alternative fuel vehicles**
- Reducing idling through an **Anti-Idling Ordinance and sign program**
- Construction of resource-efficient, **LEED-certified City buildings**
- Improving the **energy efficiency** of existing City buildings
- Implementing a City-wide **Environmental Management System**
- Maintaining a 10-day mowing cycle at City parks
- Increasing bicycle trails and lanes through the **Dallas Bicycle Program** to improve non-vehicle **transit accessibility**
- Encouraging City employees to find **alternative transit**
- Encouraging City departments to offer employees **flexible schedules or condensed work weeks**
- Planting trees to improve air quality

Incentive Programs, Grants and Tax Credits

- **Air Check Texas**: Grant program to assist vehicle owners with emissions-related repairs or the purchase of a newer, less polluting vehicle.
- **Texas Emissions Reduction Plan (TERP) Grant Program**: Provides financial assistance to businesses and individual truck drivers to replace or upgrade their diesel-powered vehicles and equipment.
- **Electric Vehicle tax credit**: Up to $7,500 back on the purchase a plug-in electric vehicle.
- **North Central Texas Council of Governments**: NCTCOG has transportation funding programs that address air quality ranging from compressed natural gas vehicle purchases to truck electrification. Funding programs are available from a number of federal, state, local and nonprofit entities. This site provides links to various current and recurring grant opportunities and incentives for clean technology and infrastructures.

Access to healthy grocery stores

Environmental burdens expand beyond risk and hazard exposure. The lack of healthy food sources is recognized as a contributing factor to disparities in healthy neighborhoods. Limited access to grocery stores affects the daily lives of American families and shape lifelong healthy eating habits. This section explores the extent to which spatial patterns and inequities exist with respect to healthy food access.

In 2015, the U.S. Department of Agriculture (USDA) developed its second **Food Access Research Atlas**. It offered several food access measures at the census tract level using half-mile and 1-mile demarcations to the nearest supermarket for urban areas, 10-mile and 20-mile demarcations to the nearest supermarket for rural areas. It included a measure of vehicle availability for all tracts (USDA, 2015). These food access measures are derived based on a 2015 list of supermarkets, the 2010 Decennial Census and the 2010-14 American Community Survey (ACS).

For the purpose of this Fair Housing Assessment and relying on the public input received throughout the AFH process, the focus is made on further examining the intersection of food access, transportation access, poverty and residential living patterns.

Key concepts, definition and computation:

- A census tract is considered **low access** if a significant number (at least 500) or share of (at least 33%) individuals is far from a supermarket.

- **Low vehicle availability**: more than 100 households in the tract report having no vehicle available and are more than half a mile from the nearest supermarket.

- **Low-income**: tract with a poverty rate of at least 20%, or a median income family less than 80% of statewide median income family, or a median income family less than 80% of the surrounding metropolitan area.

- **Poverty Rate:** share of population at or below poverty line

- **R/ECAP**: a tract characterized by a nonwhite population share of at least 50% and a poverty rate of at least 40%.

Map 115 shows census tracts with a poverty rate of at least 40% that is flagged as "low income and low access" as well as 2016 R/ECAPs. About 56% of all R/ECAPs in Dallas (20 out of 36) are also areas with low access to food. Conversely, 77% (20 out of 26) of areas characterized by low access to food and vehicle availability are also R/ECAPs.
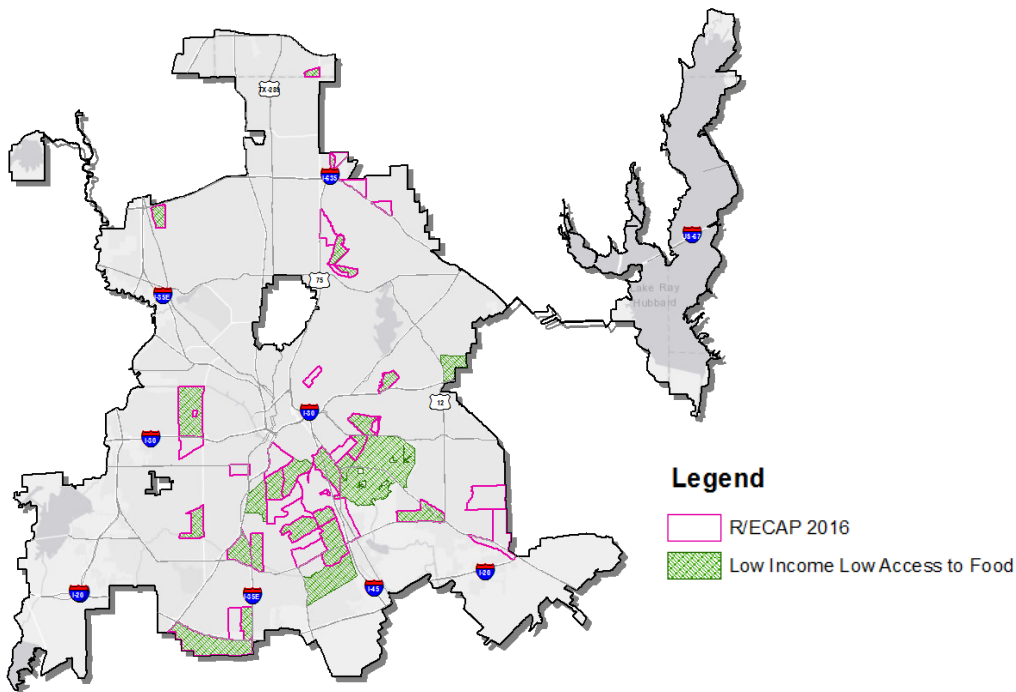
Figure 115: Low-Income Low-Access (LILA) to food census tracts and R/ECAPs

Map 116 overlays 2016 R/ECAPs with the share of housing units that are without a vehicle and located more than half a mile from a supermarket. Similarly, census tracts with the highest shares of housing units without a vehicle and beyond half a mile from a supermarket tend to also be in a R/ECAP.
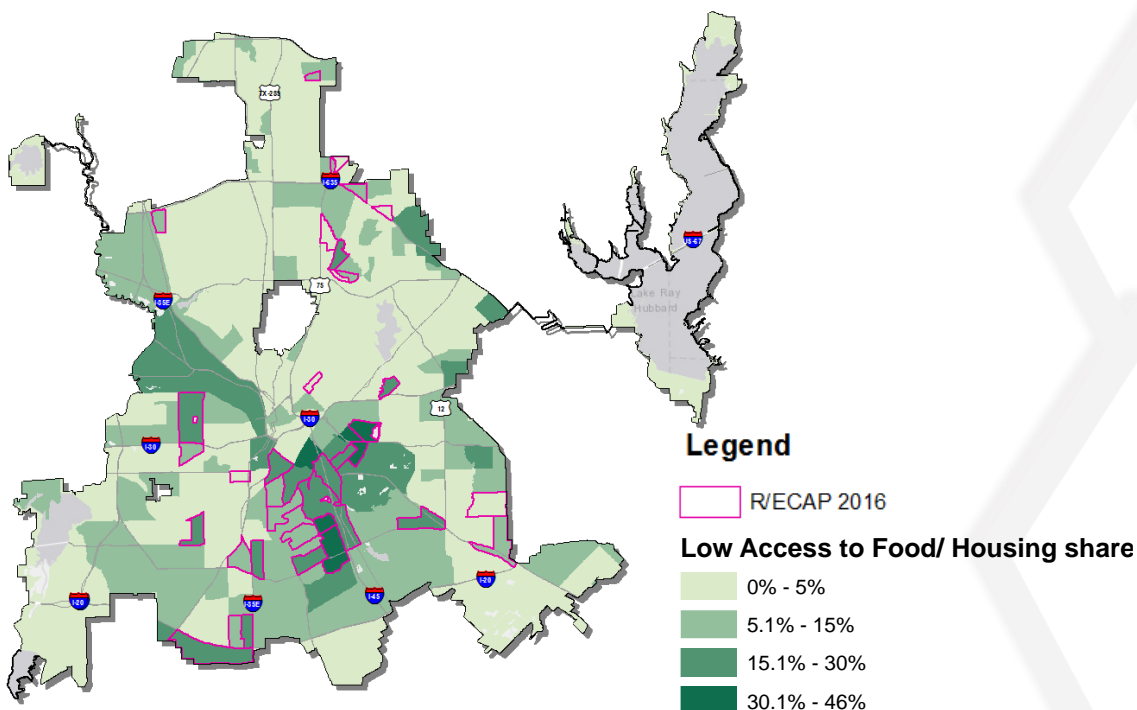
Figure 116: Share of housing units without a vehicle and beyond half a mile from a supermarket
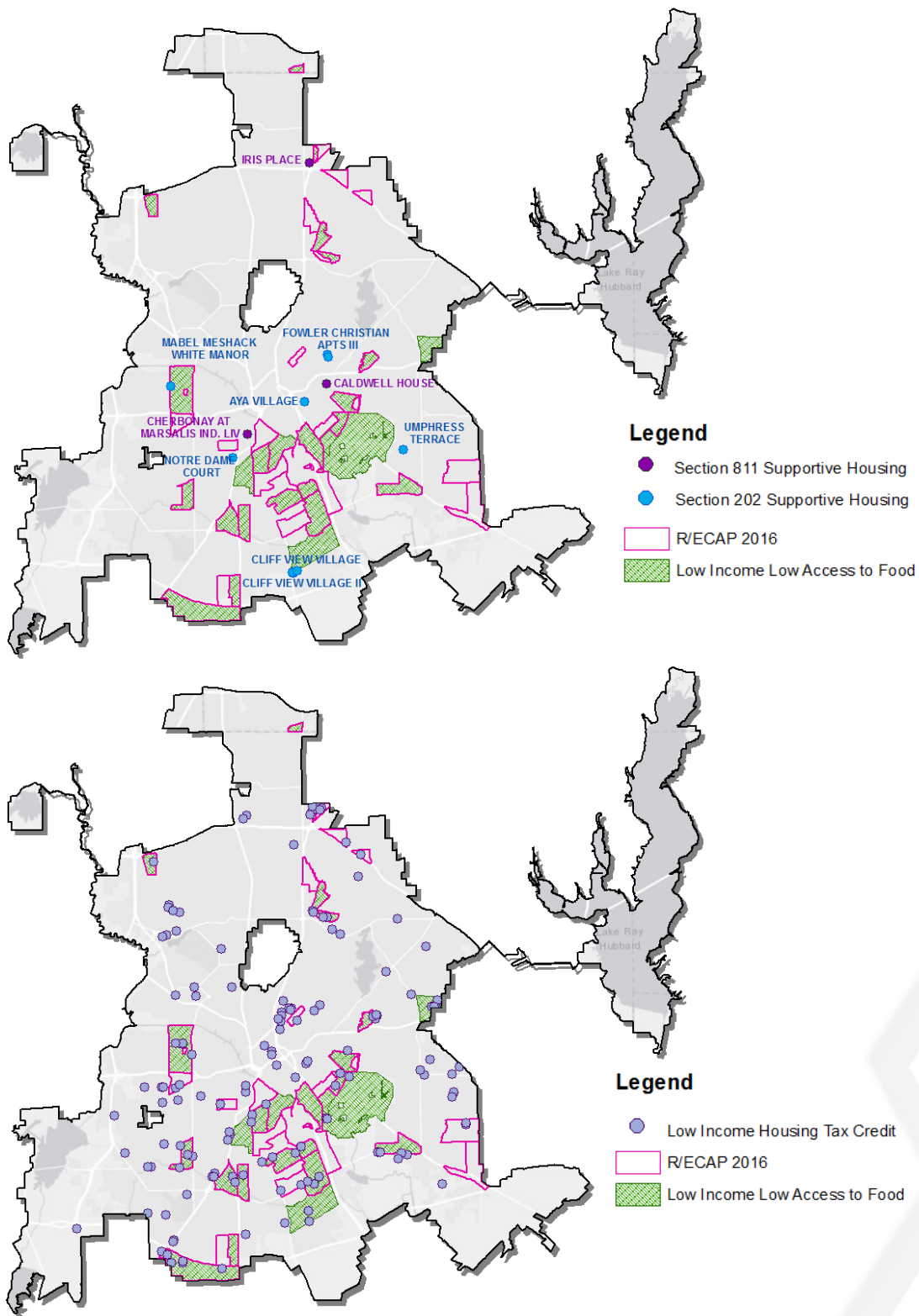
Figure 117: LILA census tracts, Sections 202 and 811 supportive housing (top) and LIHTC developments (bottom)

While only one Section 202 Supportive Housing development (Mabel Meshack White Manor) is located within a low income low access (LILA) census tract, there are an estimated 49 Low Income Housing Tax Credits within LILA census tracts, with an average of 1.8 per LILA tract.
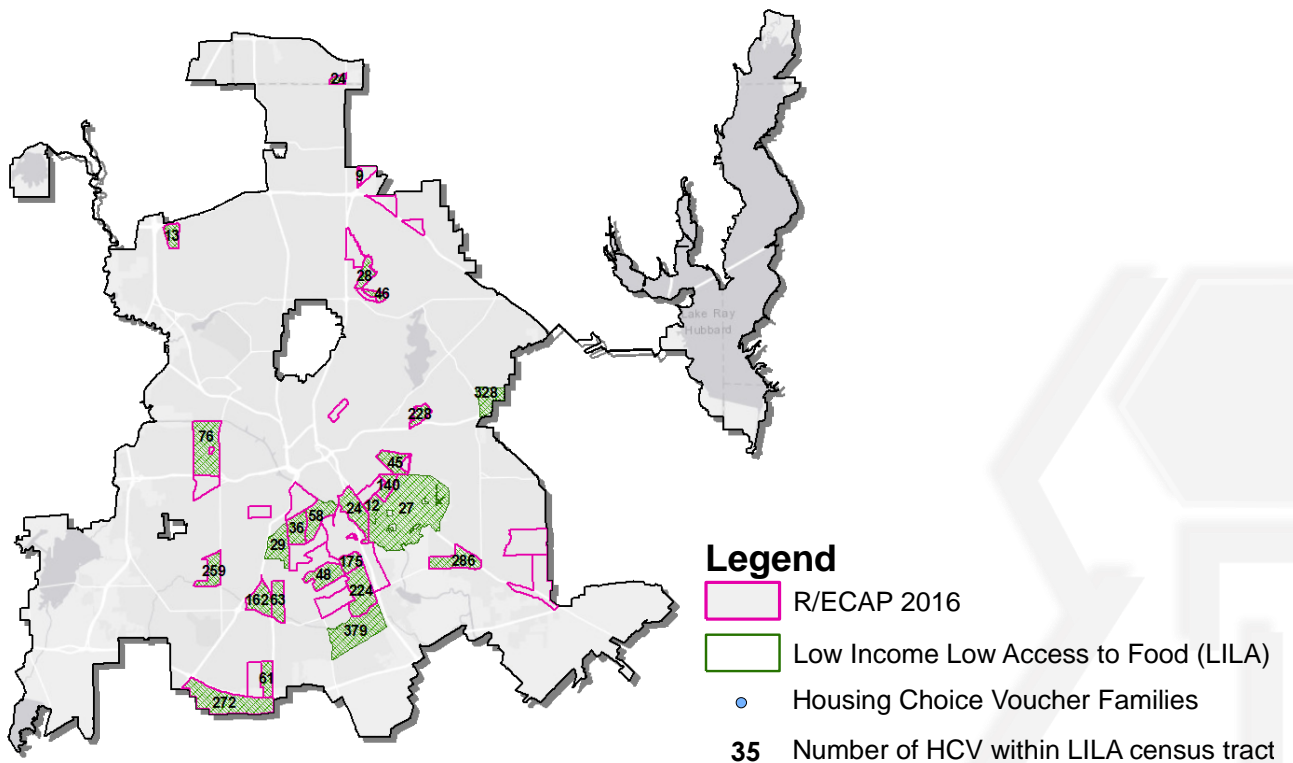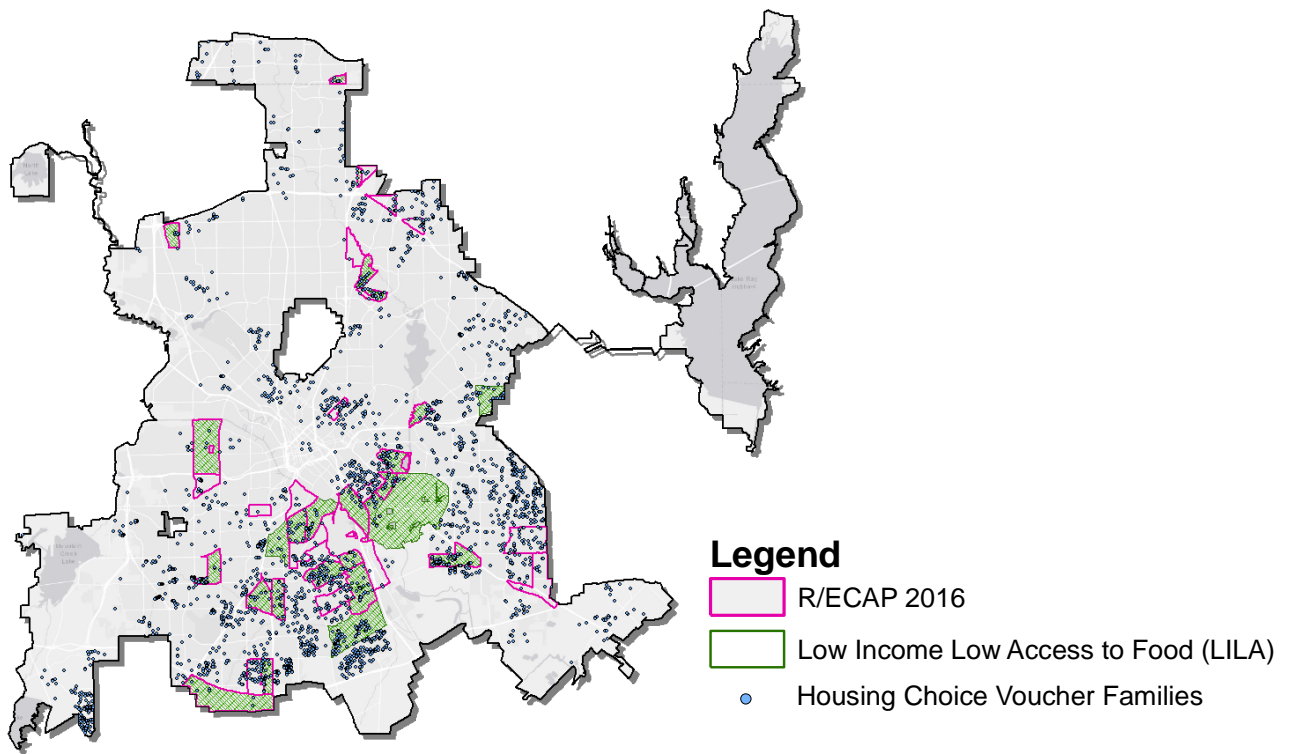
Figure 118: HCV residential patterns, R/ECAPs and low access to food stores

An estimated 3,052 HCV families are within census tracts characterized by low income and low access to food. The average number of HCV families per LILA tract is approximately 117. The most HCV-populated LILA tracts are located in the southeast Oak Cliff, west Oak Cliff and Red Bird areas.

Health Care

In 2018, the Center for Public Policy Priorities (CPPP) released a report on economic opportunity in Dallas County. The report analyzed a series of economic opportunity indicators as well as indicators of health and safety. The following graph and table, extracted from the CPPP report, indicate that since the passing of the Affordable Care Act, the number of uninsured individuals has declined. However, variations across racial and ethnic groups persist, with nonwhite households being uninsured at a greater rate than white households.
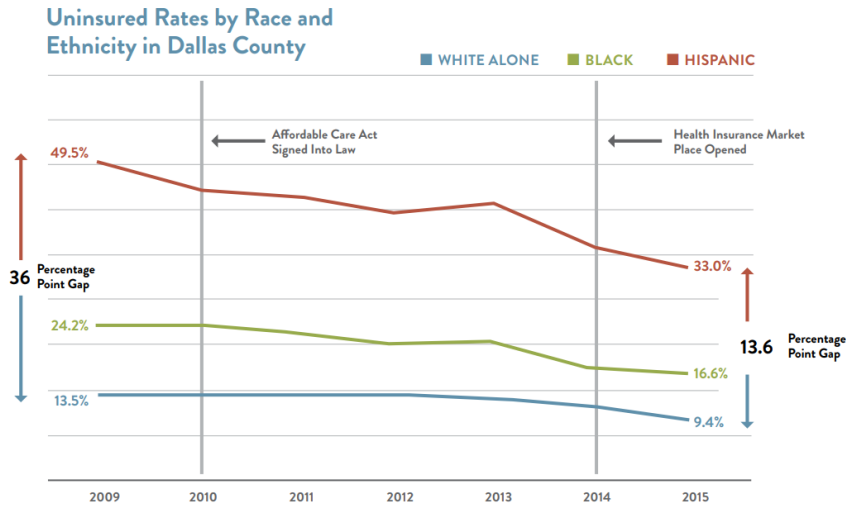
Figure 119: Uninsured rates by race and ethnicity in Dallas County (source: CPPP)

From 2009 to 2015, the share of insured black households (from the total population) increased by 2 percentage points, while it declined by 1 percentage point for, respectively, Hispanic and white households.

Table 52: Share of uninsured households by race and ethnicity (source: CPPP)

Year	Total	Black	Hispanic	White	Asian Pacific Islander
2009	735,131	116,155	476,940	111,782	N/A
	% from Total	**16%**	**65%**	**15%**	N/A
2015	524,247	93,611	331,983	72,003	N/A
	% from Total	**18%**	**63%**	**14%**	N/A

CPPP's analysis also showed that lower income residents had the highest insured rates. On the other hand, as income increased, the individual was more likely to have access to private and employer-based coverage.
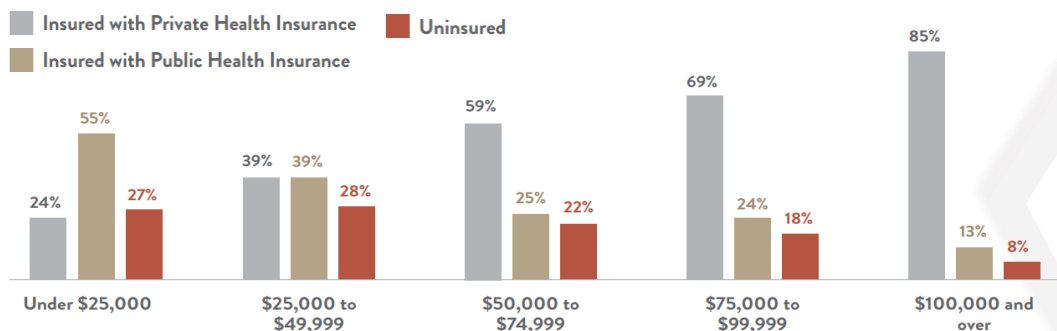
Figure 120: Uninsured rates across income brackets (source: CPPP)

e. *PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY*

| i | *For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration and R/ECAPs. Describe these patterns for the jurisdiction and region.* |

Table 53 provides the average index scores for the races and ethnicities for the overall population and the population below the federal poverty level in Dallas and the DFW region. In Dallas, only the low poverty and labor market engagement indices appear to be significantly impacted by poverty; however, the school proficiency index also significantly impacts whites and Asian/PIs below the poverty line. White households in Dallas appear to be most disadvantaged by their poverty because their scores drop significantly for all three of the previously highlighted indices; however, white population living below the poverty line still outperforms the black and Hispanic populations regardless of poverty. These differences between the white population living below the poverty line and the black and Hispanic populations range from about eight points for the school proficiency index to about 20 points for the LME index. For black and Hispanic households below the poverty line, their scores for the three key indicators drop between two and six points from the corresponding overall population, which indicates that poverty still imposes some decrease in access to opportunities, but these seem minor when compared to the racial disparities. The Hispanic population slightly outperforms the black population across the key indicators. In Dallas, the spatial segregation of the black and Hispanic populations has a much more significant impact than poverty on the populations' access to opportunities.

In Plano, spatial concentrations of nonwhite residents coincide strongly with the LME index and LP index spatial distributions. While the school proficiency index does not coincide as strongly as the previous indices, it still shows a strong overall spatial correlation with nonwhite residents. The black population concentration in south Dallas sees some spatial correlation with the environmental health Index, which helps explain the four-point difference in average scores between the white and black populations. For Dallas, the spatial patterns of segregation and R/ECAP locations match the locations with lower SP, LME and LP index scores.

Regardless of poverty status, the black and Hispanic populations suffer significant location disadvantages within the DFW region because their scores remain 20 points below the average scores for the white population across the key indices and as much as 10 points below the white population living below the poverty line for the SP index. Within the DFW region, all races and ethnicities living below the poverty line appear to suffer location disadvantages based on the aforementioned indices; however, when comparing the Hispanic and black populations, poverty appears to have a slightly greater impact on the black population with their scores dropping under the Hispanic population below the poverty line. At the regional level, the spatial patterns of regional segregation and R/ECAP locations match the locations with lower SP, LME and LP index scores.

When comparing Dallas to the DFW region, all populations live in locations with lower scores for the LP and SP indices. For all Dallas groups, the scores appear to be at least eight points lower than their corresponding regional comparison group. LME for the white population appears particularly strong in Dallas for the overall population and those living in poverty; in both cases, Dallas outperforms the overall regional population by three to eight points. This stands in sharp contrast to the Hispanic and black populations in Dallas, which score approximately 40 points lower than the overall white population and about 10 points lower than the corresponding

regional populations. This indicates that Dallas may represent a location of opportunity for the white population but that the current segregation patterns present a barrier due to the lack of features furthering access to opportunities in the segregated locations.

Table 53: HUD-provided opportunity indices scores across groups

(Dallas, TX CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	56.57	51.88	75.49	55.85	74.41	54.53	27.95
Black, Non-Hispanic	20.12	30.14	30.66	54.63	70.09	40.83	23.63
Hispanic	21.40	32.10	36.58	55.58	72.18	45.30	27.22
Asian or Pacific Islander, Non-Hispanic	42.89	45.18	64.65	61.57	81.45	51.30	27.75
Native American, Non-Hispanic	34.71	39.51	52.19	55.86	73.63	50.31	26.81
Population below federal poverty line							
White, Non-Hispanic	36.94	40.14	57.21	58.22	76.96	49.78	27.36
Black, Non-Hispanic	14.23	28.32	24.55	55.35	70.97	40.63	23.22
Hispanic	16.56	31.84	34.22	57.04	74.01	46.17	26.14
Asian or Pacific Islander, Non-Hispanic	29.17	38.36	50.87	62.96	82.98	49.06	25.65
Native American, Non-Hispanic	20.31	40.75	35.78	58.61	77.74	52.68	25.32
(Dallas-Fort Worth-Arlington, TX) Region							
Total Population							
White, Non-Hispanic	64.62	60.86	67.57	42.14	51.91	50.10	33.02
Black, Non-Hispanic	40.78	40.39	47.59	48.17	60.55	44.28	29.40
Hispanic	37.25	41.24	45.75	48.70	61.74	47.18	29.86
Asian or Pacific Islander, Non-Hispanic	66.83	61.68	74.36	48.94	60.65	48.35	33.45
Native American, Non-Hispanic	56.41	54.36	59.73	43.05	53.41	49.43	32.51
Population below federal poverty line							
White, Non-Hispanic	48.24	50.43	53.86	44.63	57.02	52.01	31.42
Black, Non-Hispanic	24.15	33.32	33.43	51.04	65.56	45.27	27.00
Hispanic	25.63	37.16	38.58	51.35	65.99	48.95	28.30
Asian or Pacific Islander, Non-Hispanic	51.26	52.34	60.78	52.22	67.80	51.48	30.06
Native American, Non-Hispanic	35.38	43.07	43.31	46.44	60.60	55.88	29.75

ii *Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.*

North Dallas consistently receives higher scores for the key indicators of interest; however, pockets of poverty and segregation appear in a few locations discussed in the R/ECAP section. Low access across multiple indicators occurs throughout most of east, west and south Dallas. While most potential areas of opportunity with lower poverty and higher labor market engagement appear in north Dallas outside these emerging R/ECAP locations, two potential locations occur in Oak Cliff. One of these locations occurs along the south side of I-30 near Hampton. The other occurs on the north side of I-20 in the Red Bird area.

At the regional level, the suburbs outperform Dallas and Fort Worth across the key indicators; however, most suburbs have isolated pockets of lower performance for the LME and LP index scores. The school proficiency index does not provide a clear recommendation for opportunity because not all suburbs have strong schools; however, they almost all have schools that outperform Dallas and Fort Worth ISD schools.

2. Additional Information

a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.*

The preceding Fair Housing Analysis subsections on segregation, R/ECAPs and disparities in access to opportunity shed light on critical patterns and systemic challenges that are likely to continue to shape the landscape of opportunity and inequities in Dallas and the North Texas region if not explicitly acknowledged and addressed.

To assist with the effective provision of affordable housing and the implementation of the Fair Housing Act's 1968's obligation to affirmatively further fair housing, the assessment calls for careful attention to the following:

- *Persistent and severe patterns of segregation*

   The level of racial and ethnic segregation in Dallas continues to increase since 1990 and is characterized by stark geographical patterns.

- *Proliferation of R/ECAPs*

   From 1990 to 2016, the City of Dallas experienced a proliferation of R/ECAP areas, with persistent extreme poverty levels in the southern sector.

- *Source of income discrimination*

   The data suggests that source of income discrimination is likely undermining federal national policy goals (i.e. poverty deconcentration) and appears to conflict with other policies (i.e. SAFMR) established in the pursuit of fair housing.

- *Racial/ethnic inequities*

   The data shows that nonwhite populations tend to face higher rates of fair housing challenges and an overall lower access to opportunity. Such trends are likely exacerbated by spatial patterns of segregation, poverty and access to affordable transportation options.

- *Economic vulnerability and market pressures*

   Trends of increasing housing prices and property valuations that exceed growth in local wages disproportionally affect lower income individuals and their ability to secure and maintain affordable housing.

- *Inclusive Investments and deep income targeting strategies*

b. *The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities and transportation).*

The City of Dallas is pursuing a series of initiatives to bridge inequities and foster greater access to opportunity and supportive services:

Dallas Equity Indicators

"The Dallas Equity Indicators project was developed in collaboration with the City University of New York's Institute for State and Local Governance (CUNY ISLG) and the University of Texas at Dallas' Institute for Urban Policy Research (IUPR) as a comprehensive tool to help Dallas understand and measure progress toward equity in our community. Dallas' 72 Equity Indicators are designed to measure equity, or the fairness or justice in outcomes for Dallas residents, across six thematic areas: Economic Opportunity, Education, Housing and Neighborhood, Justice and Government, Public Health, and Transportation and Infrastructure." (source: City of Dallas website).
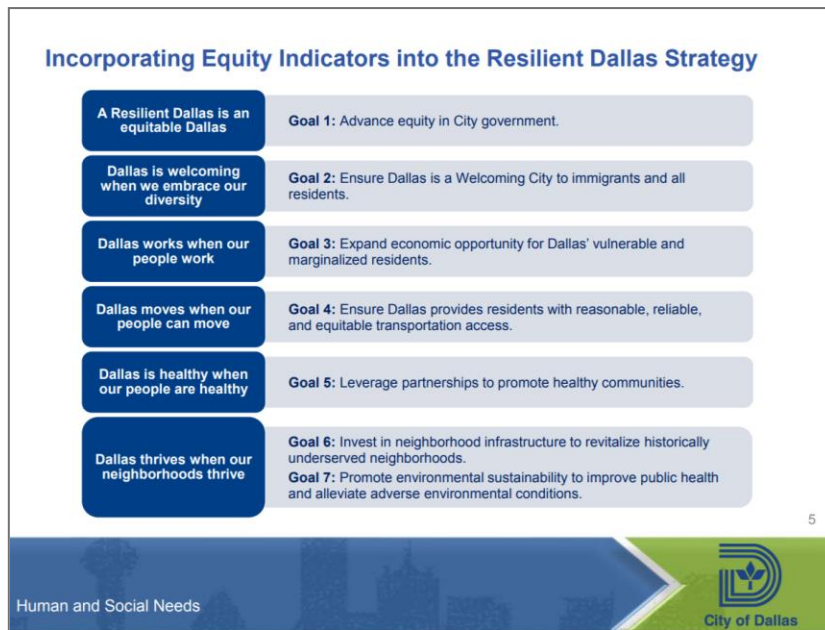
Figure 121: Incorporating equity indicators into the Resilient Dallas Strategy

Market Value Analysis

"The Market Value Analysis (MVA) is a tool to assist residents and policy-makers understand the elements of their local residential real estate markets. It is an objective, data-driven tool built on local administrative data and validated with local experts. This analysis was prepared for the City of Dallas by The Reinvestment Fund. Public officials and private actors can use the MVA to more precisely target intervention strategies in weak markets and support sustainable growth in stronger markets." (source: City of Dallas website).

The MVA is a tool issued by the City of Dallas in the development of its newly adopted Housing Policy.

Housing Policy

On March 12, 2017, the Dallas City Council Housing Committee established three goals for the development of a comprehensive strategy for housing: 1) Create and maintain available and affordable housing throughout Dallas, 2) Promote greater fair housing choices, and 3) Overcome patterns of segregation and concentrations of poverty through incentives and requirements. A housing policy was approved in May 2018. The policy is guided by a Market Value Analysis.
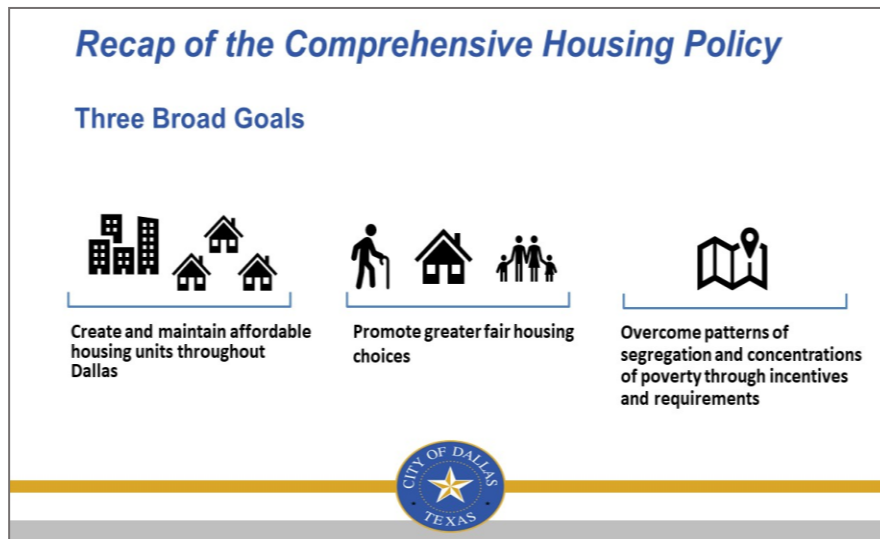
Figure 122: Three broad goals of Dallas' Housing Policy

Strategies in the housing policy include:

New Development: Incentivize private investment for the development of quality, sustainable housing that is affordable

Preservation of Existing Housing Stock: Preserve existing housing stock by financing home improvements that address health, safety, accessibility and structural/deferred maintenance deficiencies; by granting tax freezes to owners who make improvements to their properties; and by incentivizing developers to preserve affordable housing.

Direct Assistance: Enable persons to purchase homes within the City by providing direct funding assistance.

Smart Growth for Dallas

Smart Growth for Dallas is a partnership between The Trust for Public Land, the **City of Dallas**, the Texas Trees Foundation and buildingcommunityWORKSHOP. Smart Growth for Dallas is a data-driven initiative aiming to improve the environmental, social and economic resilience of Dallas by creating close-to-home parks, trails and greenspaces. One core outcome of the partnership is the creation of an online mapping platform. The tool highlights and prioritizes specific geographic areas for investment as it relates to parks, trails, greenbelts, trees, green storm water infrastructure and other green assets. Following a "triple bottom line" strategy, the analysis seeks to identify where green assets can provide tangible social, economic and environmental benefits.

Welcoming Communities and Immigrant Affairs

Established in March 2017, the Dallas Office of Welcoming Communities and Immigrant Affairs is creating a multifaceted program, **Welcoming Plan**, to promote the inclusion of immigrants into the social and economic fabric of the Dallas community.

EQUITABLE ACCESS

WCIA works to ensure that existing and proposed policies simplify and increase immigrant access to City services. WCIA works with other departments to ensure that immigrants and refugees are aware of and have access to all City of Dallas services.

Older Americans Employment Initiative Program

Provides employment assistance to adults age 60 and above throughout Dallas, including:

- Training on job search techniques

- Assisting older adults with job search

- Providing referrals

The program also provides community presentations to seniors on employment training and other related topics of interest. The Older Americans Employment Initiative Program is implemented by The Senior Source.

Senior Medical Transportation Program (SMTP)

The SMTP provides transport services to medical facilities for low- to moderate-income seniors. Eligible residents must be 60 years of age or older and reside within the City of Dallas. Medical facilities must be located within the City. Services are door-to-door and free to eligible clients. Wheelchair vehicles are available upon request.

Child Care Services

Child Care Assistance, which is a component of the Child Care Services program, is designed to assist the "working poor" or full-time students with the cost of child care for a maximum of one (1) year. This program handles child care subsidies for income-eligible parent(s). In addition, child care information, referrals and workshops for parents/providers are offered. The Adolescent Parent Program component of Child Care Services seeks to provide quality child care for children of adolescent parents who are full-time students.

3.   Contributing Factors of Disparities in Access to Opportunity

During the first round of public meetings and focus groups, participants were asked to identify contributing factors to the seven fair housing issues at the heart of the AFH tool. The issue of disparities in access to opportunity generated the most comments from participants. Indeed, more than 31% of all comments were related to disparities in access to opportunities.

The most cited set of contributing factors to disparities in access to opportunities was the **lack of public and private investments**, as well as **crime**. Participants reported that there is a lack of development and investment in retail, a lack of employment and basic infrastructure, which in return prevents investments. A participant commented that "families want grocery stores and retail, nobody wants to live in a food desert". The lack of access to grocery stores and healthy food was reported by several participants, who further explained that this resulted in "overpaying for groceries because of the lack of markets in the area". Similarly, participants emphasized the lack of affordable transportation options and high-performing public transit as further deepening equities. Residents explained that "there is a lack of connectivity between DART light rail and the bus system" and that "greater distances must be traveled to reach Walmart and other stores". In addition, participants expressed their concerns about poor quality of sidewalks and overall lack of safety around transit stops.

Public meeting participants identified **crime and the lack of safety** as critical factors affecting investments, neighborhood quality and access to opportunity. Residents mentioned that the issue of loose dogs, the lack of policy presence and response significantly contribute to neighborhood disparities.

The second most frequently cited contributing factor to disparities in access to opportunity was **discrimination**. The issue of discrimination manifests itself in many compounding ways: through community opposition, source of income discrimination, lending discrimination and private discrimination. Participants stated that the ability of landlords to refuse vouchers also significantly contributes to disparities by prohibiting voucher families to access opportunity-rich areas. A resident further commented that "having a voucher in not an end, because they are not accepted". In addition, participants reported discriminatory lending practices, such as red lining, as well as private discrimination practices where, for example, workers at apartment complexes were instructed to not allow tattooed individuals. Residents also expressed their concerns about the inequitable and limited housing options that formerly incarcerated individuals must face.

Residents also pointed to the location of proficient schools and **school assignment policies** as contributing to disparities. Corroborating the findings of the Pew Research Center (2015), public meeting participants discussed the state of economic segregation, poverty and disparities. Commenters notably attributed residential patterns of economic segregation to the real estate premium associated with access to good schools. One participant explained: "I want to move by the great schools, well guess what, you're going to pay for it in real estate, and that's true. The nice schools go right in line with the wealth of the area." Another participant added that "there is a high demand for education in that area so it this school right here is high class and classified as one of the top schools in Dallas or in Texas, I promise you that the houses around it are going to be triple the value than the ones that are somewhere else. The school is what is making the house price rises – it's all tied to DISD".

Participants also expressed their concerns about the presence of environmental health hazards and its negative impacts on residents' health and a neighborhood s' ability to attract investments.

Finally, residents expressed their concerns regarding the perceived lack of interest and responsiveness from policymakers and the City in effectively addressing disparities. Participants explained that "the city lacks accountability to ensure that people are better served", "there is a role for city governments, to address these issues. They should create a safe environment".

Sample AFH public engagement

The following comments from public meetings, focus groups and surveys express public participants' views about poverty, housing and disparities in access to opportunities.

Answering "What are the contributing factors to disparities in access to opportunity?"

- "Discrimination. Some people will not accept vouchers in certain areas"
- "I'm overpaying for housing because of my situation, overpaying for groceries because of the lack of market"
- "The cement factory in West Dallas has a large impact on Dallas as well as District 1"
- "The City ignores the help needed. In the meantime, all these high-end houses pop up"
- "The basic problem of not having houses near where you work"
- "It should be necessary for the City to make sure there are enough units to accept vouchers"
- "Different areas of Dallas north/south are treated different"
- "Certain roads are only populated with companies that deal with metal (…) it is hard to get over these environmental hazards because they will continue to exist"
- "There is also a lot of discrimination against women with kids"
- "There is a lack of political will from city government"
- "Air toxins exposure is very high, the environmental issues are real in West Dallas"
- "A lot of zoning they are doing now include environmental studies and they are unable to pass them in West Dallas because of the problems that people are mentioning"
- "Handicap people have it hard in some places with no opportunity, because they cannot walk"
- "We need more resources to know how to voice our opinion and how to help ourselves"
- "I would like to live in a community where you don't have to worry, where council members listen to you. Safety and good education"
- "Lack of job and basic infrastructure"
- "People in low income communities are so caught in trying to stay above water that things that impact their lives, they are not part of it"
- "Expensive apartments continue to be built"
- "Environmentally harming businesses continue in the neighborhood"
- "There is a large amount of seniors dying , possibly due to worsening environmental conditions"
- "More police, enforce speed limits, good lighting (…) crime in neighborhood"
- "More banks, supermarkets"
- "Economic development designed by and with the immediate community"

iv. Disproportionate Housing Needs

1. Analysis

a. *Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?*

The following figure shows the percentage of race/ethnicity groups experiencing one of four **housing problems: housing cost burden** (defined as paying more than 30% of income for monthly housing costs, including utilities), **overcrowding** (more than one person per room), **lacking a complete kitchen**, or **lacking plumbing**. Figure 123 presents the same data for **severe housing cost burden**, which is paying more than **50% of income for monthly housing costs** including utilities. Table 54 has an additional section that shows the severe burden, which replaces regular (30%) cost burden with the severe (50%) cost burden while keeping the other burdens the same.

By Race and Ethnicity

Around 42% of Dallas households suffer at least one housing problem while at the regional level almost 35% of households experience a housing problem. The Hispanic households in Dallas appear disproportionately impacted by housing problems, with 54% of Hispanic households experiencing housing problems, which is greater than the regional value of 49%. Black households in Dallas have the second highest rate at about 48%, and this is greater than the regional rate of 46%. White households in Dallas experience housing problems at a slightly higher rate (30) as white households throughout the region (27%). Finally, Asian/PI households and other, non-Hispanic households both experience higher housing problem rates in Dallas when compared to the DFW region. Housing problems for white households in Dallas happen significantly less frequently than all other racial and ethnic groups; furthermore, a greater proportion of Hispanic and black households experience housing problems than all other races and ethnicities.
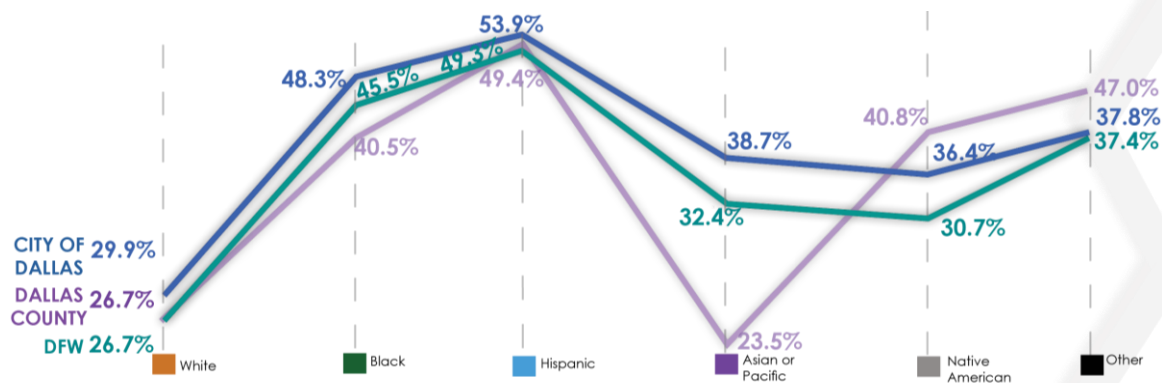
Figure 123: Rates of housing problems by race and ethnicity, City of Dallas, Dallas County, DFW region

As before with housing problems, severe housing problems occur in 24% of Dallas households while at the regional level over 18% of households experience a severe housing problem. Dallas' white (15%), Hispanic (34%), black (28%), Asian/PI (25%), Native American (19%) and other (20%) households experience severe housing problems more frequently than their overall

regional rates (12%, 30%, 24%, 19%, 17%, respectively). Severe housing problems for white households in Dallas happen significantly less frequently than all other racial and ethnic groups.

By Family Type and Size

In Dallas, non-family households experience a rate of housing problems comparable to the regional rate of over 40 percent. Both types of family households experience more housing problems than at the regional level; 67% of Dallas-based family households of five or more face housing problems while 50% of these households encounter housing problems in the DFW region. Only about 37% of small family households encounter housing problems in Dallas while 28% of families this size encounter housing problems in the DFW region.

Figure 124: Rate of housing problems by household type and size

Table 54: Disproportionate housing needs by race/ethnicity and household size and type, Dallas and DFW region

Disproportionate Housing Needs	(Dallas, TX CDBG, HOME, ESG) Jurisdiction			(Dallas-Fort Worth-Arlington, TX) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	54,205	180,765	29.99%	360,875	1,348,425	26.76%
Black, Non-Hispanic	58,725	121,260	48.43%	165,008	362,115	45.57%
Hispanic	73,790	136,729	53.97%	230,317	466,931	49.33%
Asian or Pacific Islander, Non-Hispanic	5,830	15,032	38.78%	37,039	114,143	32.45%
Native American, Non-Hispanic	297	814	36.49%	2,352	7,647	30.76%
Other, Non-Hispanic	2,793	7,383	37.83%	12,863	34,357	37.44%
Total	*195,640*	*462,000*	*42.35%*	*808,445*	*2,333,530*	*34.64%*
Household Type and Size						
Family households, <5 people	78,435	212,860	36.85%	375,730	1,337,021	28.10%
Family households, 5+ people	35,730	53,435	66.87%	142,804	283,318	50.40%
Non-family households	81,465	195,705	41.63%	289,900	713,190	40.65%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	26,740	180,765	14.79%	166,886	1,348,425	12.38%
Black, Non-Hispanic	33,425	121,260	27.56%	88,173	362,115	24.35%
Hispanic	47,045	136,729	34.41%	138,278	466,931	29.61%
Asian or Pacific Islander, Non-Hispanic	3,784	15,032	25.17%	21,545	114,143	18.88%
Native American, Non-Hispanic	157	814	19.29%	1,307	7,647	17.09%
Other, Non-Hispanic	1,454	7,383	19.69%	6,805	34,357	19.81%
Total	*112,610*	*462,000*	*24.37%*	*422,970*	*2,333,530*	*18.13%*

Dallas Severe Cost Burden by Ethnic Group

In 2013, around 24% of Dallas households experienced severe housing cost burden, which remains greater than the regional rate of 18%. This trend manifests across all races and ethnicities. The white population experiences a greater rate (15%) of severe housing cost burden in Dallas and the rest of the region (12%). Dallas Hispanic households experience severe cost burden at a greater rate (34%) than regional Hispanic households (30%) and all other races and ethnicities. Black and Asian/PI households experience severe housing cost burden at a rate (28%, 25%), greater than in the region (24%, 19%). Severe housing problems for white households in Dallas happen significantly less frequently than all other racial and ethnic groups.

b. *Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*

<u>Locating Dallas' Housing Problems by Race</u>

As of 2013, the rate of housing problems in Dallas census tracts ranged from a low of 10% to a high of 77%. Most census tracts had between 40% and 60% of households report housing problems. North Dallas, other than locations of racial and ethnic concentrations, consistently has fewer housing problems than west, south and east Dallas (Figure 125); this pattern matches the nonwhite segregation pattern in Dallas. In addition to differences based on location, housing problems varied significantly by race and ethnicity. While white households in southeast Dallas and far northeast Dallas frequently experience housing problems, Hispanic and black households experience housing problems at greater rates throughout the City. Furthermore, many of the census tracts with the greatest rates for Hispanics and black households occur in north Dallas where the access to opportunities remains high. Many areas observe over 60% of the Hispanic households incurring housing problems. Among tracts with available data for Asian/PI households, several report over 80% experiencing housing problems in 2013, including in a few census tracts in central and north Dallas, but many other census tracts in the same areas show less than 20% of Asian/PI households experiencing housing problems. As a whole, housing problems tend to match closely with the spatial distribution of the low poverty index and nonwhite segregation.
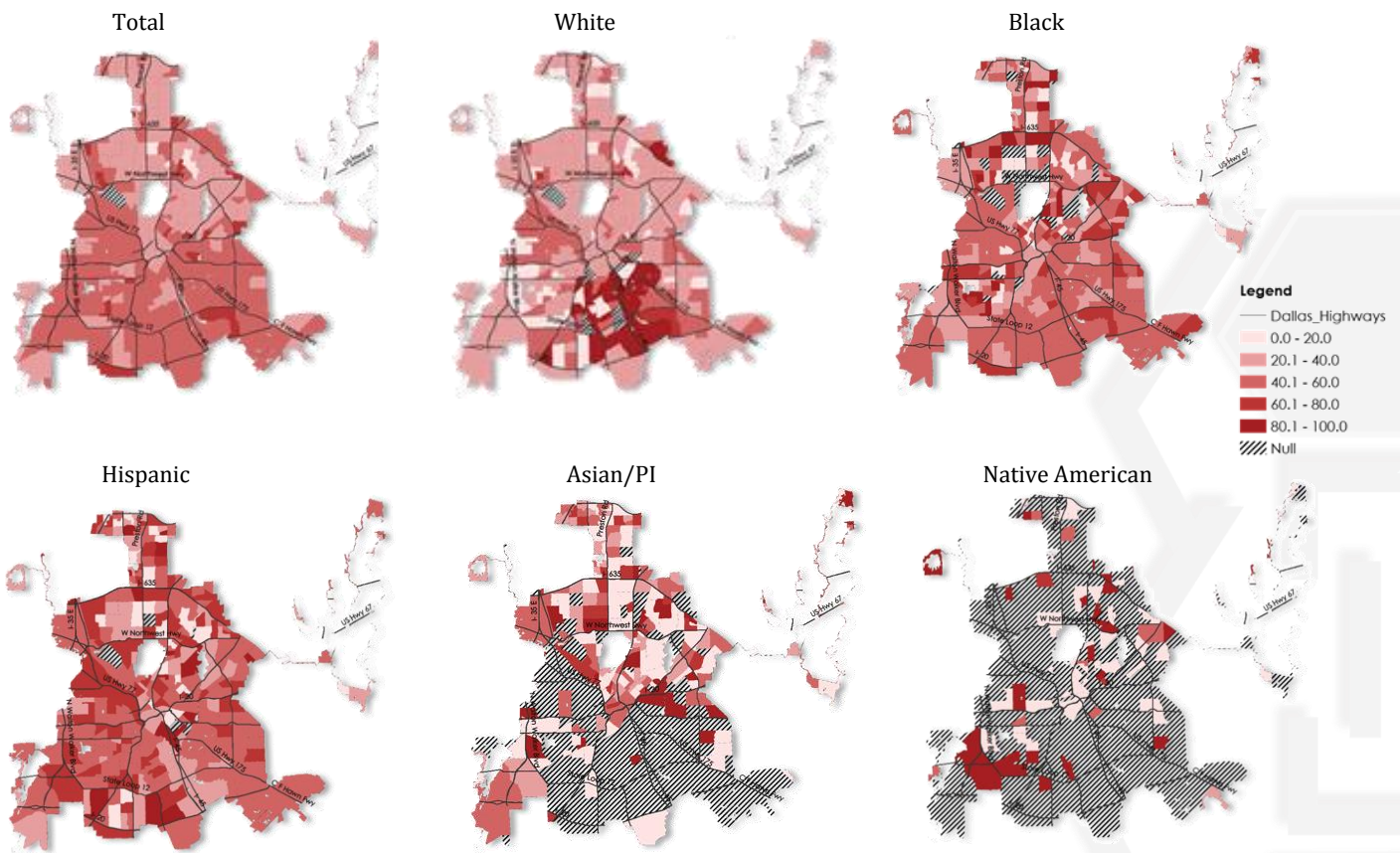
Figure 125: Housing problems by race/ethnicity: spatial patterns, Dallas

Locating the region's housing problems by race/ethnicity

On the whole, housing problems prevail in and around the region's two hubs, Dallas and Fort Worth. Both cities feature large areas where the residents experience housing problems at a rate of at least 40% (Figure 126). Areas with particularly high rates of housing problems are found throughout most of Dallas, with the sole exception of north Dallas and in southeast as well as northwest Fort Worth (inside I-820). Other areas where over 40% of households experience housing problems include Irving, Garland near I-635 and areas of Arlington and Grand Prairie between I-30 and I-20. Many clusters of census tracts in each city exist where more than 60% of the population suffer at least one housing problem and where there exist several R/ECAPs.

Minority households seem to be far more likely than white households to suffer housing problems in the region's rural and suburban areas (Figure 127). While the nonwhite populations in some of these areas may be relatively small, those present often incur extremely high rates of housing problems. Large proportions of the white population only appear to suffer housing problems in a few isolated census tracts, while the intensity of housing problems for other races and ethnicities appears far greater. Another aspect of the problem may be the emergence of struggling enclaves, with lower living standards than surrounding neighborhoods.
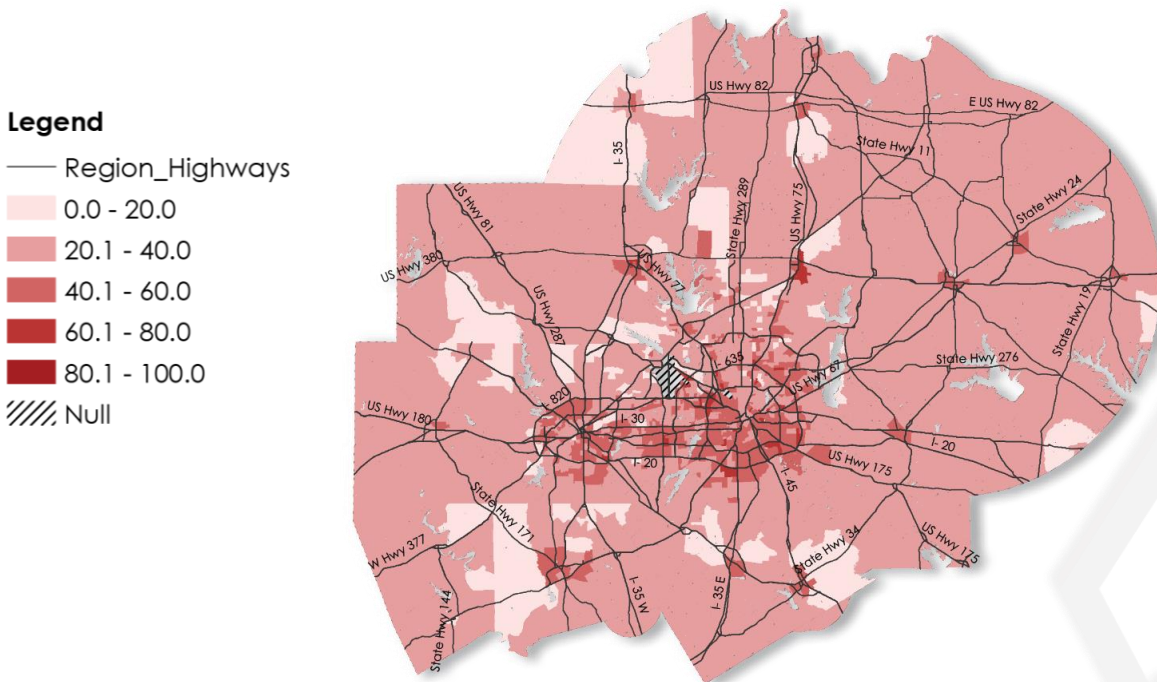
Figure 126: Housing problems: spatial patterns, North Texas region

Comparing Dallas and the Region, Housing Problems

To some extent Dallas typifies the issue described above. Even given that the percentage of households experiencing housing problems remains higher than in the region, portions of Dallas along East Ledbetter Drive with high Hispanic concentrations suffer particularly high rates of housing problems. In addition to experiencing housing problems in areas with a concentration of nonwhite individuals, each nonwhite group tends to experience housing problems in locations where the white population does not. As an example within Dallas, the rate of housing

problems in much of central and south Dallas is elevated for all groups, but Hispanic and black households incur a high rate of housing problems throughout virtually all of Dallas.

Legend

— Region_Highways
- 0.0 - 20.0
- 20.1 - 40.0
- 40.1 - 60.0
- 60.1 - 80.0
- 80.1 - 100.0
- Null
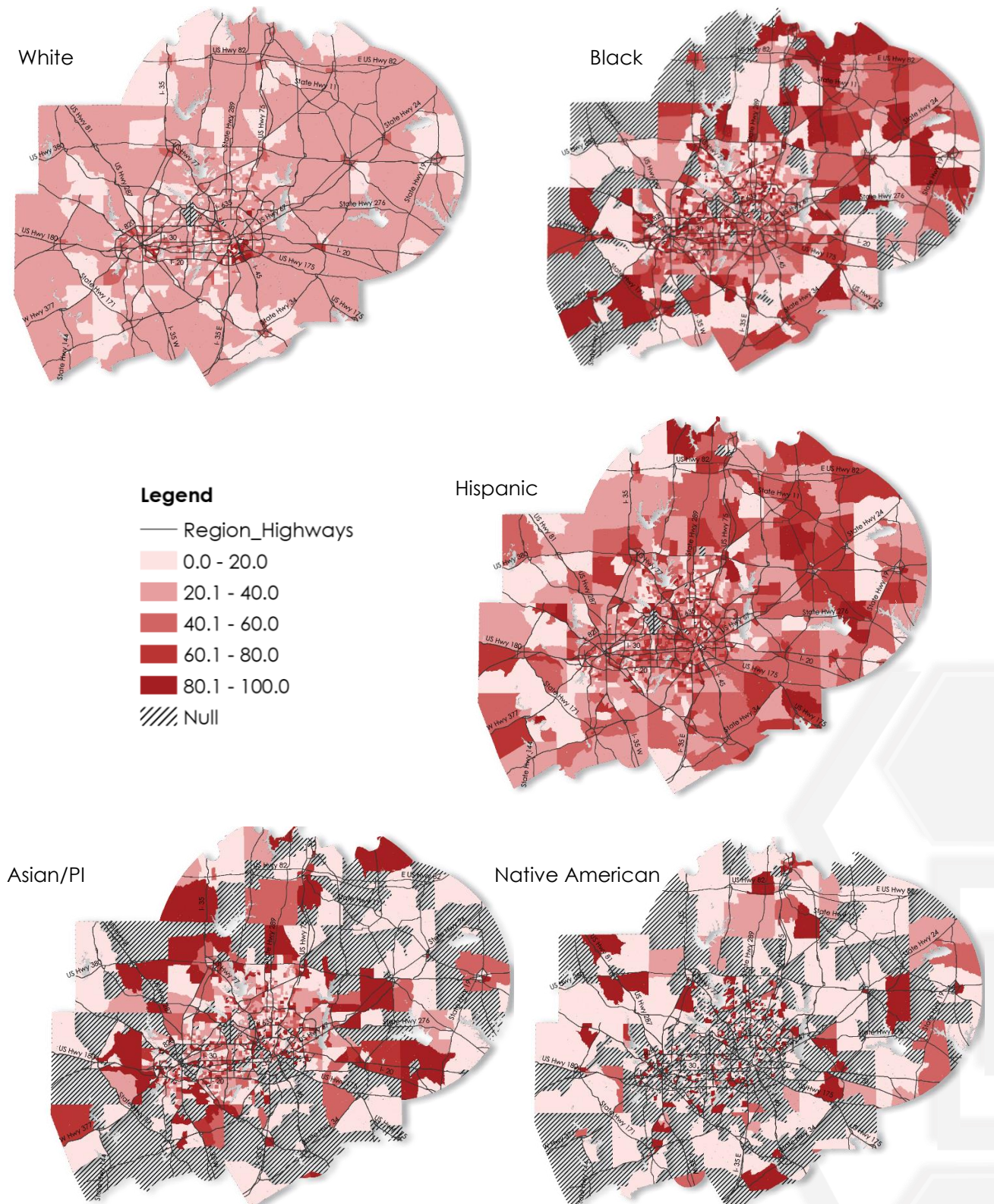
Figure 127: Housing problems by race/ethnicity: North Texas region

Locating Severe Cost Burden by Race/Ethnicity in Dallas

As of 2013, 17% of households in Dallas report spending more than 50% of their income on housing and utilities (severe housing cost burden). In Dallas, only one census tract records severe housing burden in more than 40% of households, in Old East Dallas (Figure 128). In a few census tracts north of I-30 and Oak Cliff, at least 60% of black households report severe cost burden. Throughout Dallas, all nonwhite groups experience significant concentrations of elevated severe cost burden rates. The most concentrated areas of poverty in Dallas present a greater proportion of elevated severe housing burden for all observed races and ethnicities.

Overall Severe Cost Burden

White Severe Cost Burden   Black Severe Cost Burden   Hispanic Severe Cost Burden

Asian/PI Severe Cost Burden   Native American Severe Cost Burden
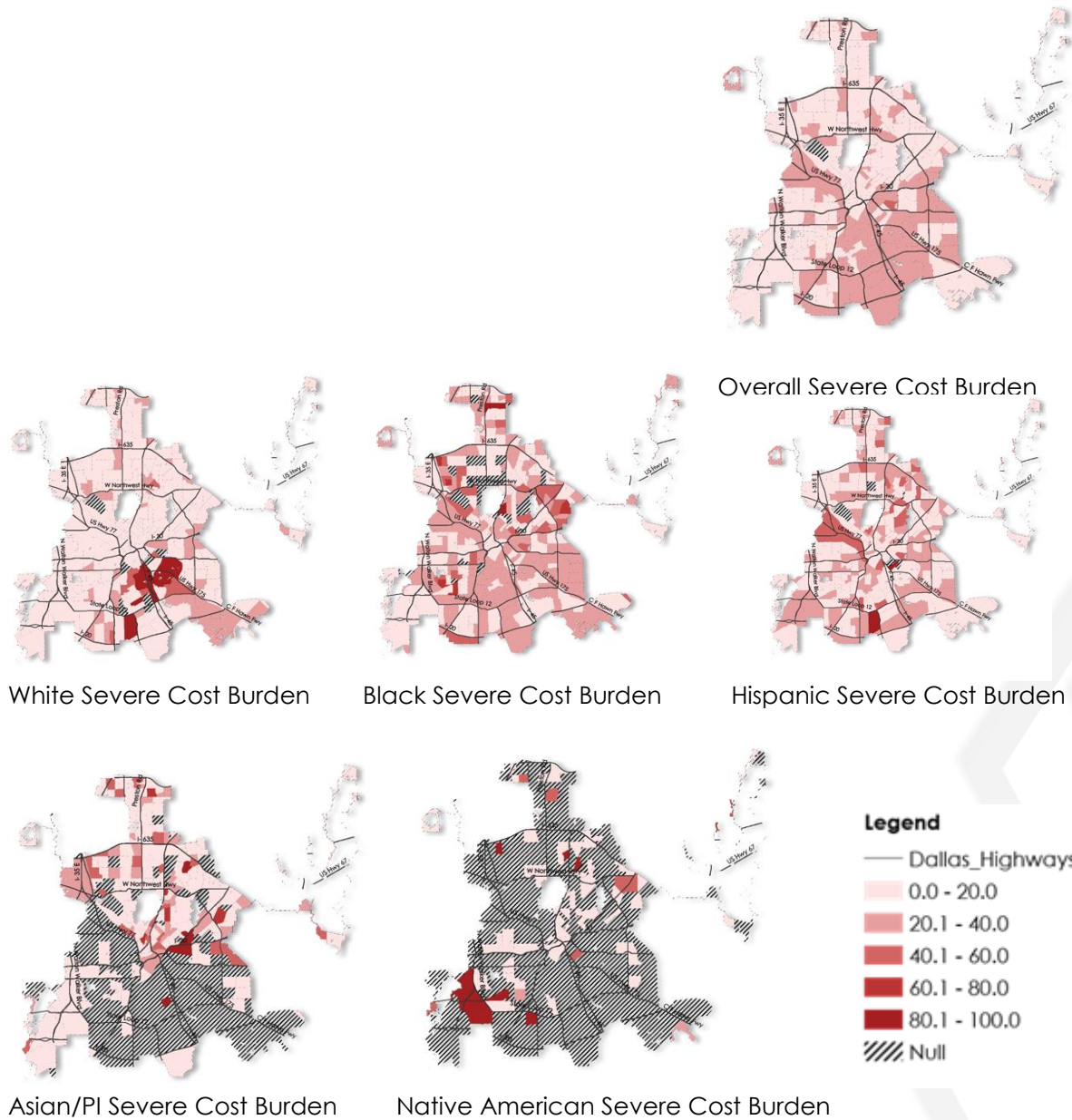
Figure 128: Severe housing cost burden by race/ethnicity: spatial patterns, Dallas

Looking at the population as a whole, the largest concentrations of severe cost burden appear in south and east Dallas, as well as in southeast Fort Worth. Smaller concentrations appear in south Denton, east McKinney, southeast Irving and other southern suburbs in Dallas and Tarrant counties. The white population faces concentrations of severe cost burden in isolated cases that often mirror the overall spatial distribution. Several outlying areas feature high levels of severe cost burden for some of the region's minority populations, which repeat the pattern evident for housing problems. While the black population remains less spatially distributed than the white and Hispanic populations, it frequently experiences concentrations of elevated severe cost burden rates throughout the study region. High percentages of the black population scattered in the region's northeast corner pay over 50% of income for housing. The Hispanic population has the same wide spatial distribution of severe cost burden as the white population, but it experiences greater concentrations of severe cost burden. These concentrations appear particularly strong near areas with high access to opportunities. Asian/PI households tend to experience severe cost burden in areas with or near greater access to opportunities.

Comparing Dallas and the Region, Severe Cost Burden

Within Dallas, the only concentration of elevated severe cost burden rates for the general population appears in south Dallas where extreme poverty rates (greater than 40%) tend to exist. At the same time, the minority populations appear to experience pockets of concentrated high severe cost burden throughout the City. In several cases, these locations possess high access to opportunities. This demonstrates that even in areas with stronger labor markets, the minority populations experience greater risk of severe housing burden and concentration into enclaves. This closely matches the findings for cost burden rates.
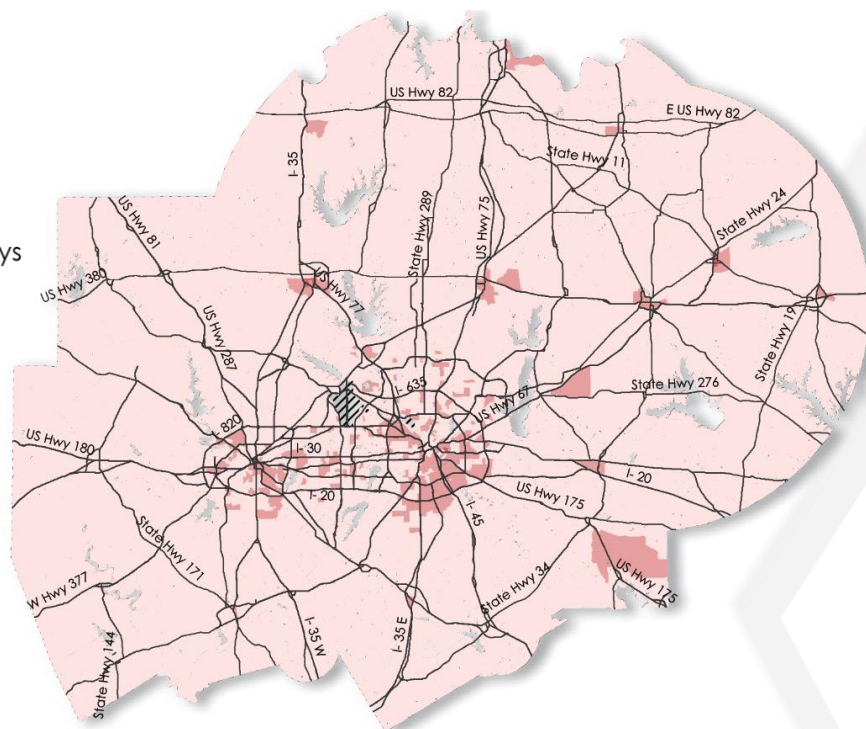
Figure 129: Severe cost burden: spatial patterns, North Texas region
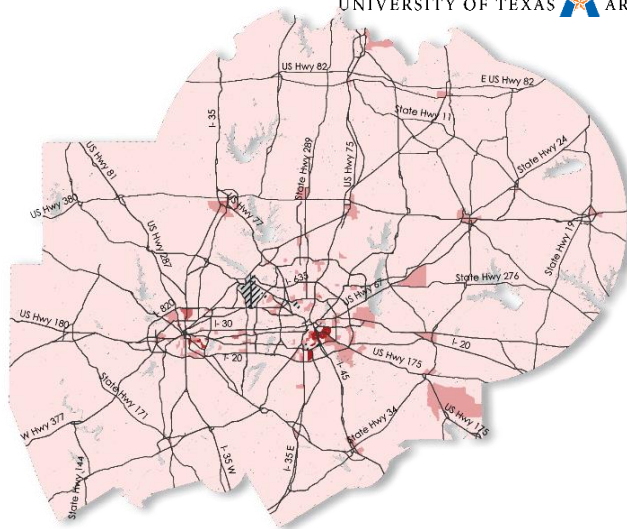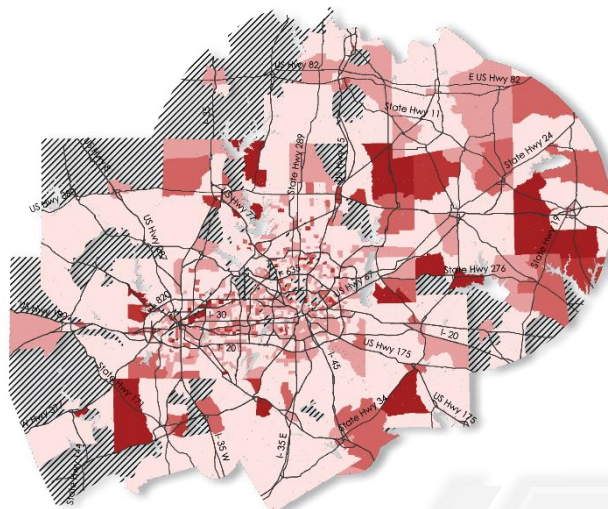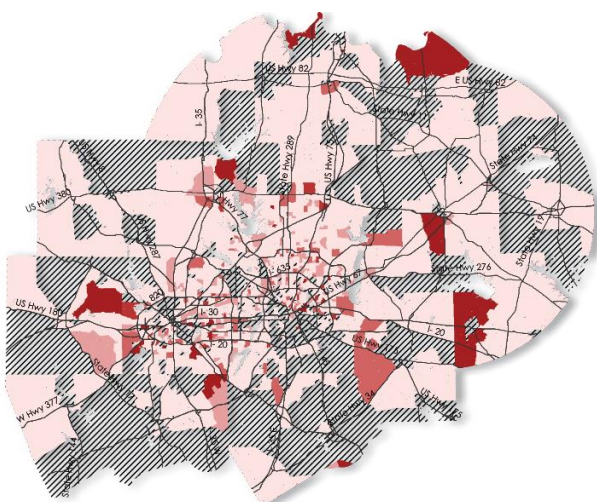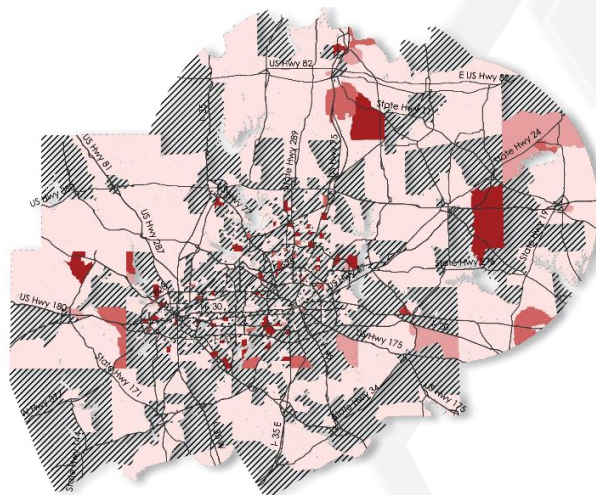
Figure 130: Severe cost burden: spatial patterns, North Texas region

c. **Compare the needs of families with children for housing units with two and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.**

Figure 131 displays the percent of households reporting housing problems (2012 US Census, CHAS data) by household size, as well as the percentage of each type of publicly supported housing units with one or fewer, two, or at least three bedrooms. Housing problems appear most prevalent among large family households in Dallas because 67% experience housing problems. In the Dallas, 27% of units utilized within the HCV program have three or more bedrooms, while just 26% of project-based Section 8 units and 30% of public housing have at least three bedrooms. The relatively low percentage of publicly supported housing units with three or more bedrooms compared to the elevated rate of housing problems families with at least five members, indicates the supply of publicly supported housing falls far below the needs of families with housing problems.
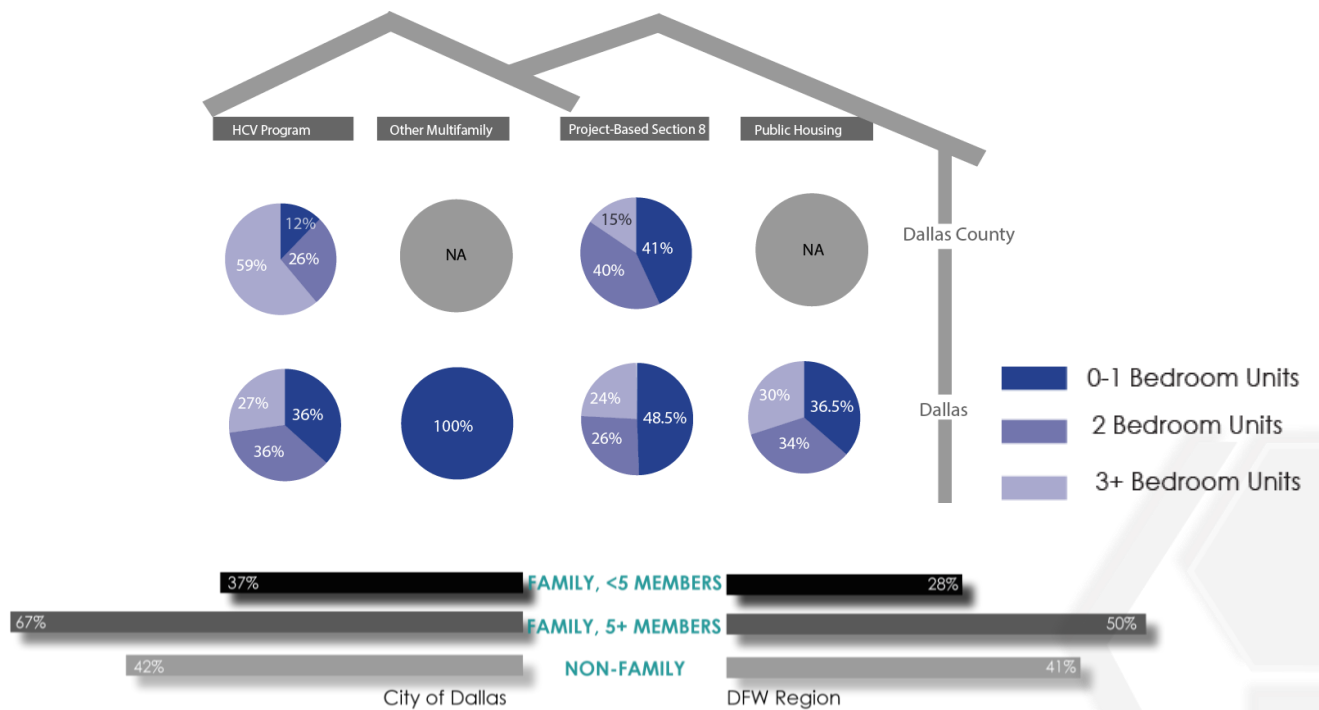
Figure 131: Bedrooms per category of publicly supported housing and housing needs of family with children

d. *Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.*

According to Figure 132, 44% of Dallas households own the home, which remains well below the regional rate of 61%. Over half of Dallas census tracts have over 40% homeownership. White households represent 50% of homeowners in Dallas, which significantly exceeds their representation of about 30% of the general population. This trend mirrors one found at the regional level as white households account for about two-thirds of homeowners but only represent about half the population. Asian/PI households in Dallas rent (4%) and own (3%) homes at rates near their population distribution of 3%; this also remains true at the regional level. In both Dallas and the region, black households represent a smaller share of homeowners (19% and 10%, respectively) than the overall population (24% and 15%). In turn, black households represent a greater share of renting households than their population distribution in Dallas and the region. In Dallas, the Hispanic population accounts for 31% of homeowners while representing almost 42% of total Dallas residents. This gap also occurs on the regional level, where Hispanic households account for about 17% of homeownership and over 27% of the total population. While Hispanic homeownership rates remain lower than expected, the percentage of Hispanic rental households reflects their population distribution, which likely indicates differing household density patterns between Hispanic households and other races.
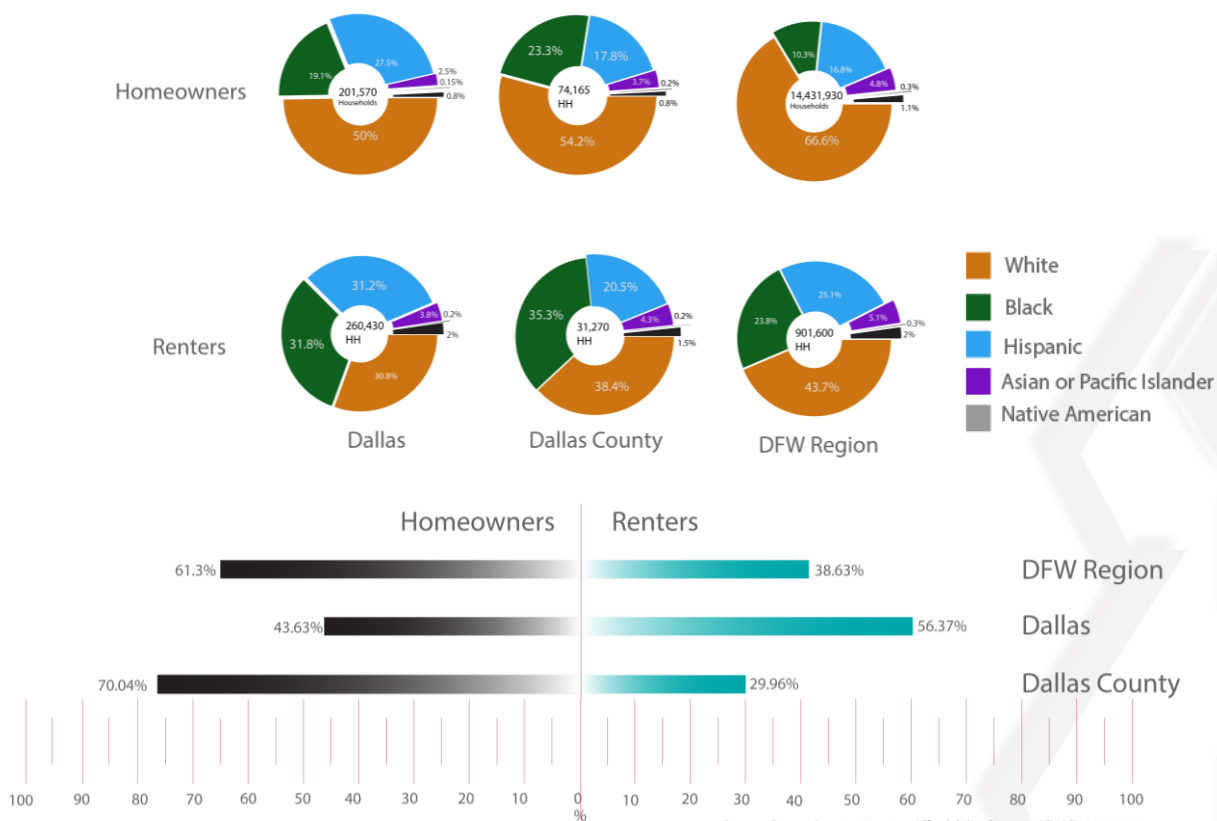
Figure 132: Housing tenure by race/ethnicity, City of Dallas, Dallas County and DFW region

2. Additional Information

Despite registering a decrease in annual rent change in the third quarter of 2017, rent prices continue to rise in Dallas, with a projected increase in annual rent change for the third quarter of 2018 (MPF, 2017).
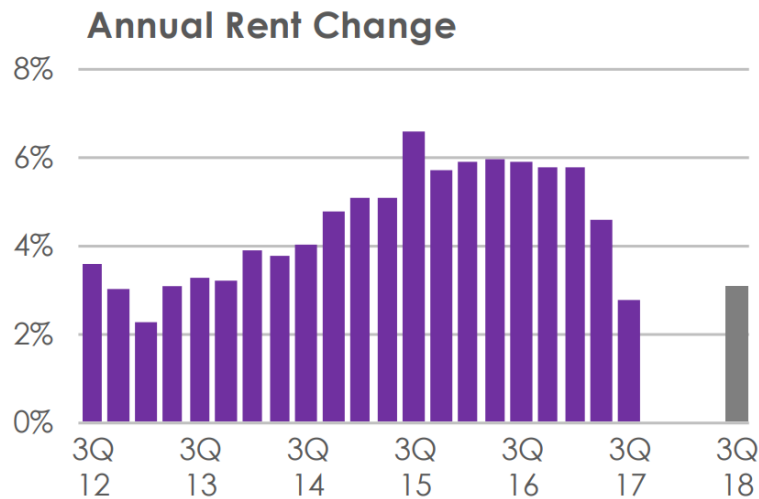
Figure 133: Annual rent change in Dallas (source: MPF)

The rising cost of housing exerts considerable pressure on economically vulnerable populations and tends to disproportionately affect the following types of households in Dallas and across the region:

- Families with children
- Senior citizens and others living on fixed incomes such as persons with disabilities
- People who are homeless
- Lower income residents
- Young people just starting out to form their own households

Fixed-income households and affordability

Table 55 displays 2016 income data in the City of Dallas (U.S. Census Bureau, 2016). In 2016, 20% of Dallas households (97,756) received Social Security benefits (SS). The average income received from Social Security was $16,727. About 9 percent of households in Dallas received retirement income, which accounts for over 45,000 households.

A household receiving average SS benefits alone could afford no more than $419 per month on rent and utilities (spending 30% of income on housing). Households living on Supplemental Security Income (SSI) had incomes averaging only $8,694 and could only afford monthly rent and utilities of $218. Households living on Cash Public Assistance (TANF, over 7,000 households) had average incomes of $2,979 and could afford only $75 per month in rent and utilities.

Table 55: Households on fixed incomes in Dallas

Dallas, TX: Households with fixed incomes (ACS, 2016)	Number of households	Average income by Source	Affordable Monthly Housing (30% of Income) rounded to nearest dollar
With Social Security	97,756	$16,727	$419
With retirement income	45,382	$24,007	$601
With Supplemental Security Income	22,659	$8,694	$218
With cash public assistance income	7,254	$2,979	$75

Average monthly rent in Dallas in the third quarter of 2017 was $1,127, which appears considerably out of reach for the population on fixed income averaging the income figures described above (MPF Research, 2017). Monthly rent for an efficiency apartment in Dallas averaged $835, and a one-bedroom averaged $998, which would be unaffordable to households living on SSI, cash public assistance or one SS income alone.

Submarket Number (Key Below)	1	2	3	4	5	6	7	8	9	10	METRO
Monthly Rent	$1,738	$1,592	$1,327	$1,146	$998	$1,329	$873	$1,059	$902	$890	$1,127
Rank	1	2	5	14	21	3	30	18	28	29	

Submarket Number (Key Below)	11	12	13	14	15	16	17	18	19	20	METRO
Monthly Rent	$799	$811	$993	$1,011	$959	$1,298	$1,096	$1,230	$1,010	$1,293	$1,127
Rank	32	31	22	19	23	6	17	11	20	7	

Submarket Number (Key Below)	21	22	23	24	25	26	27	28	29	30	METRO
Monthly Rent	$951	$922	$1,126	$1,282	$1,292	$1,195	$1,135	$1,329	$1,194	$1,241	$1,127
Rank	24	27	16	9	8	12	15	3	13	10	

Submarket Number (Key Below)	31	32	METRO
Monthly Rent	$931	$947	$1,127
Rank	26	25	

Dallas Sub-markets			
1 Intown Dallas	9 Northeast Dallas	17 Carrollton/Farmers Branch	25 West Plano
2 Oak Lawn/Park Cities	10 Far East Dallas	18 Addison/Bent Tree	26 Central/East Plano
3 East Dallas	11 Southeast Dallas	19 Far North Dallas	27 Denton
4 Zang triangle/Cedars/Fair Park	12 Southwest Dallas	20 Richardson	28 Frisco/Prosper
5 North Oak Cliff/West Dallas	13 Southern Dallas County	21 Garland	29 Allen/McKinney
6 Love Field/Medical District	14 Grand Prairie	22 Mesquite	30 Rockwall/Rowlett/Wylie
7 Northwest Dallas	15 Irving	23 Lewisville/Flower Mound	31 Kaufman County
8 North Dallas	16 Las Colinas/Coppell	24 The colony/Far North Carrolton	32 Ellis County

Figure 134: Monthly rent by sub-markets in greater Dallas (source: MPF)

The following map displays the geographic boundaries of each sub-market as delineated by MPF Research (2017).

As of the third quarter of 2017, the highest ranked sub-markets in Dallas are Intown Dallas, Oak Lawn/Park Cities and Love Field/Medical District. The lowest ranked sub-markets are southeast, southwest and northwest Dallas.
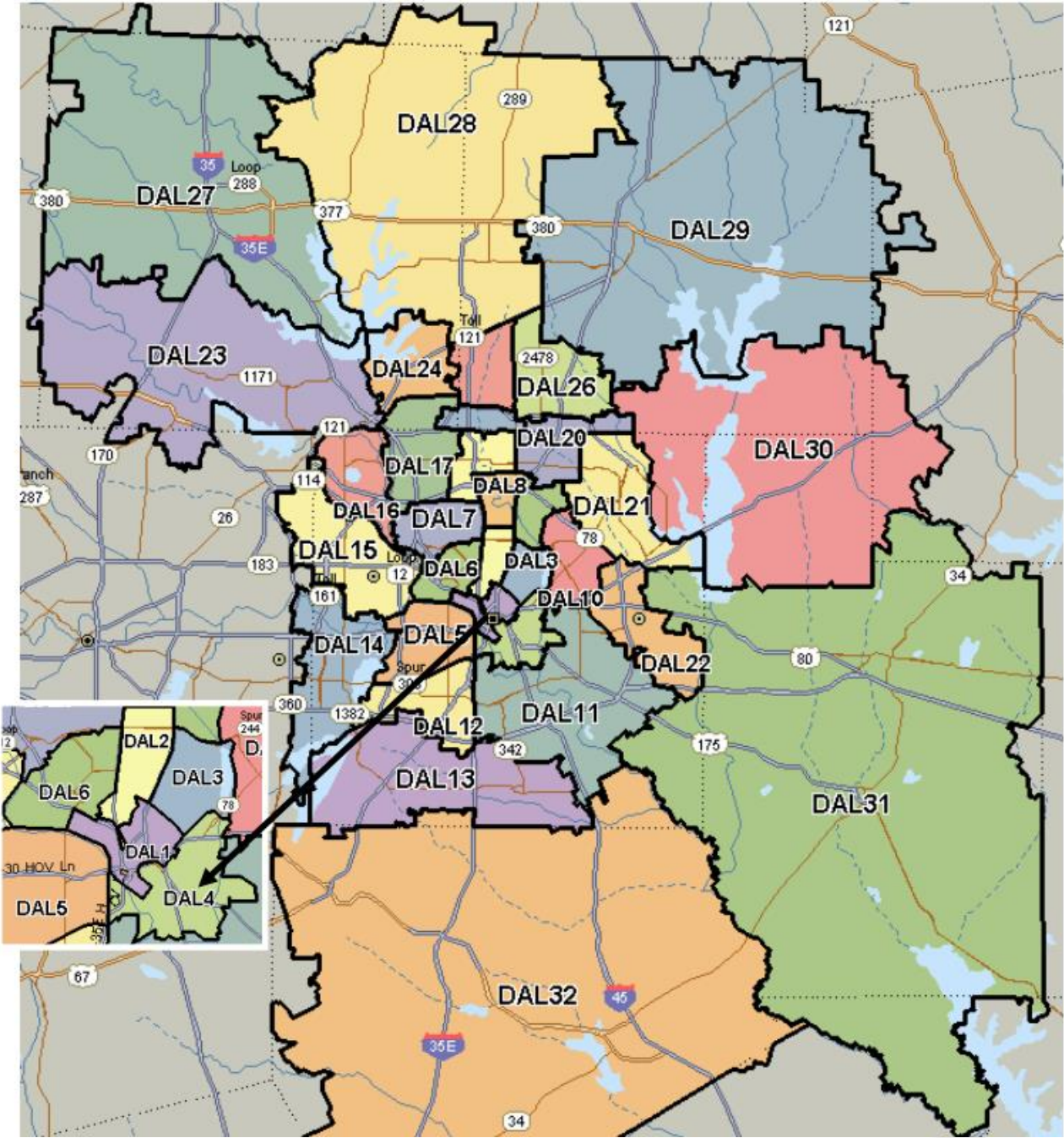
Figure 135: Sub-market delineation (source: MPF)

Table 56 displays annual household income for 2016 and the number of households at low- and moderate-income levels (U.S. Census Bureau, 2016). Approximately 42,000 households in Dallas would only be able to afford up to $250 per month for rent at 30% of income, leaving too little residual income to afford transportation, health care, child care and to meet other basic needs. Households with incomes up to $15,000 per year would not be able to afford an average efficiency apartment in Dallas ($835 per month) (MPF Research, 2017).

Table 56: Number of households within income brackets (low to moderate income), Dallas

Dallas, Texas			
Income Bracket	Percentage	Total Households	Affordable rent at 30% of income
Less than $10,000	8.70%	42,296	$250
$10,000 to $14,999	5.90%	28,720	$375
$15,000 to $24,999	12.60%	61,427	$625
$25,000 to $34,999	12.10%	59,023	$875
$35,000 to $49,999	15.00%	72,995	$1,250
Total		**487,855**	
Median income (dollars)	$45,215		
Mean income (dollars)	$75,411		

Worst case housing needs

The U.S. Census defines worst case housing needs as households that meet all the following criteria:

- No more than 50% of the Area Median Income (AMI)
- Do not receive government housing assistance
- Pay more than half of income for rent, live in severely inadequate conditions, or both (Watson, Steffen, Martin, & Vandenbroucke, 2017)

Almost half (48.5%) of households (177,000) in the Dallas-Fort Worth-Arlington metropolitan statistical area with incomes at or below 50% of area median income met the criteria for worst case housing needs in 2015. The number of households with worst case housing needs grew nationally by 39% from 2005 to 2015. Most worst case housing needs resulted from severe rental cost burden rather than inadequate conditions. The national increase in worst case housing needs precipitated a significant shift from homeownership to rental housing. New renters absorbed much of the increase in the supply of rental housing, continuing competitive upward pressure on rents (Watson, Steffen, Martin, & Vandenbroucke, 2017).

Dallas-Fort Worth-Arlington, TX		
Total households (thousands)	**365**	**1,019**
Unassisted with severe problems	177	
Unassisted with nonsevere problems only	112	
Unassisted with no problems	22	
Assisted	54	

Metropolitan Area	0–50% AMI
Dallas-Fort Worth-Arlington, TX	
Number (thousands)	365
Number with worst case needs (thousands)	177
Percent with worst case needs	48.5

Figure 136: Worst case housing needs, DFW region

Housing cost burden by income distribution and housing tenure

Since 1990, HUD and the Census Bureau have produced custom tabulations that provide grantees with information about the housing needs of low- and moderate-income households. Comprehensive Housing Affordability Strategy (CHAS) data combines ACS micro-data with HUD-adjusted median family incomes (HAMFI) and incorporates households, housing units and housing tenure characteristics.

Table 57: Housing tenure across income distribution, Dallas

Dallas, Texas (2015)						
Income Distribution Overview	**Owner**	**%**	**Renter**	**%**	**Total**	**%**
Household Income less-than or= 30% HAMFI	22,425	**24%**	72,830	**76%**	95,255	**20%**
Household Income >30% to less-than or= 50% HAMFI	25,105	**33%**	50,985	**67%**	76,090	**16%**
Household Income >50% to less-than or= 80% HAMFI	33,530	**37%**	56,555	**63%**	90,085	**19%**
Household Income >80% to less-than or=100% HAMFI	18,925	**43%**	25,030	**57%**	43,955	**9%**
Household Income >100% HAMFI	101,865	**59%**	70,000	**41%**	171,865	**36%**
Total	**201,855**		**275,395**		**477,250**	

Table 58: Cost burden by income distribution and housing tenure

Dallas, Texas (2015)					
Income by Cost Burden (Renters only)	**Cost burden > 30%**	**%**	**Cost burden > 50%**	**%**	**Total**
Household Income less-than or= 30% HAMFI	57,575	**79%**	46,910	**64%**	72,830
Household Income >30% to less-than or= 50% HAMFI	38,270	**75%**	10,020	**20%**	50,985
Household Income >50% to less-than or= 80% HAMFI	18,130	**32%**	2,490	**4%**	56,555
Household Income >80% to less-than or= 100% HAMFI	3,625	**14%**	380	**2%**	25,030
Household Income >100% HAMFI	3,170	**5%**	340	**0.5%**	70,000
Total	**120,770**		**60,140**		**275,395**
Income by Cost Burden (Owners only)	**Cost burden > 30%**	**%**	**Cost burden > 50%**	**%**	**Total**
Household Income less-than or= 30% HAMFI	15,860	**71%**	11,490	**51%**	22,425
Household Income >30% to less-than or= 50% HAMFI	14,095	**56%**	6,060	**24%**	25,105
Household Income >50% to less-than or= 80% HAMFI	11,655	**35%**	3,335	**10%**	33,530
Household Income >80% to less-than or= 100% HAMFI	4,080	**22%**	995	**5%**	18,925
Household Income >100% HAMFI	8,890	**9%**	1,520	**1%**	101,865
Total	**54,580**		**23,400**		**201,855**

Table 57 shows the number and distribution of owners and renters across income brackets. Lower income households (below 100% HAMFI) tend to rent their housing units, as opposed to owning. On the other hand, higher income households (100% HAMFI and above) tend to be owners. As households slide down the income spectrum, they are more likely to be renters than owners. The proportion of renters within each income bracket tends to be higher as income declines.

Table 58 shows the extent to which households within an income bracket tend to be cost burdened (spend more than 30% of income for housing) and severe cost burdened (spend more than 50% of income for housing).

In Dallas, a substantially greater share of households at and below 30% and 50% HAMFI were cost burdened and severely cost burdened, compared to any other income group. The rates of cost burden and severe cost burden are greater for renters than for owners and the greatest for renters at and below 30 HAMFI. Close to eight out of 10 renter families at 30% HAMFI are cost burdened in Dallas.

Income Distribution

In 2016, the estimated median income in Dallas was $45,215. The conventional thresholds AMI equivalences are 30% AMI = $13,565; 50% AMI = $22,608; 80% AMI = $36,172.

Figure 137 shows the median income by census tract for 2016. From an overall perspective, the observed spatial economic divide seems to follow the racial segregation lines identified in the segregation section. Specifically, lower income census tracts are found in the larger southern sector, far northeast Dallas, Vickery Meadow, west Dallas and the Red Bird area. R/ECAPs correlate with census tracts with a median income below 50% AMI and below 80% AMI.
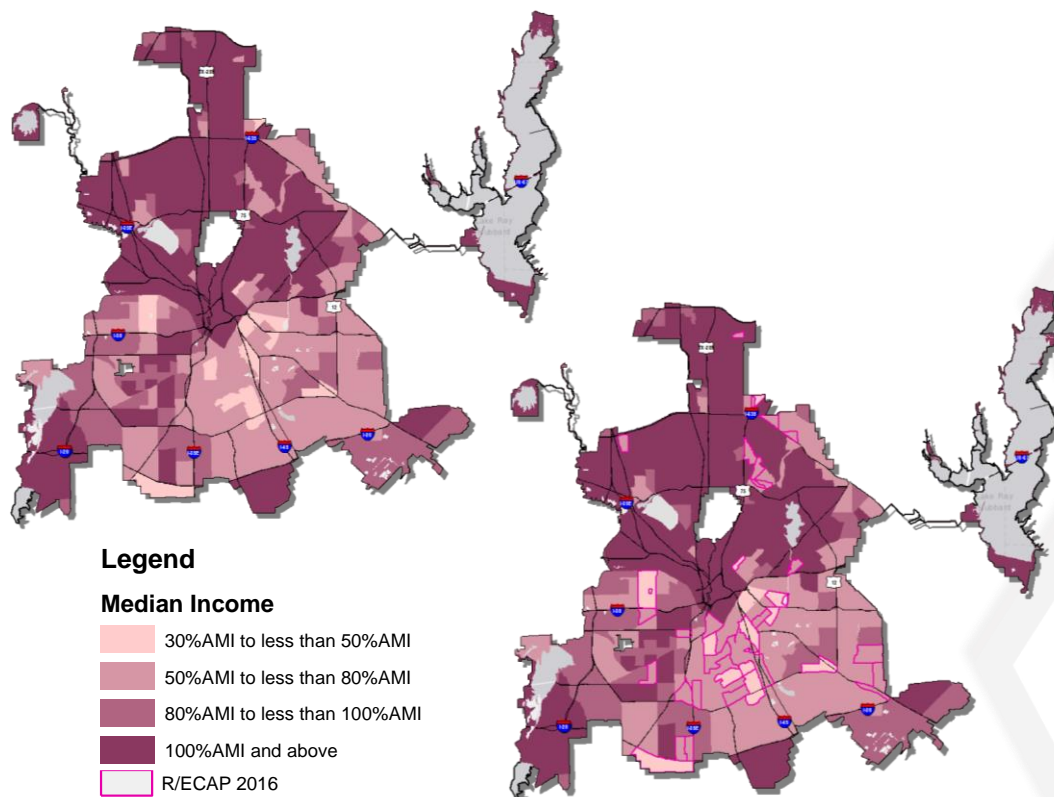
Figure 137: Median income by census tracts and R/ECAPs, Dallas

In 2016, the estimated median income in Dallas-Fort Worth was $63,330. The conventional thresholds AMI equivalences are then as follow: 30% AMI = $18,399; 50%AMI=$30,665; and 80%AMI=$49,064.
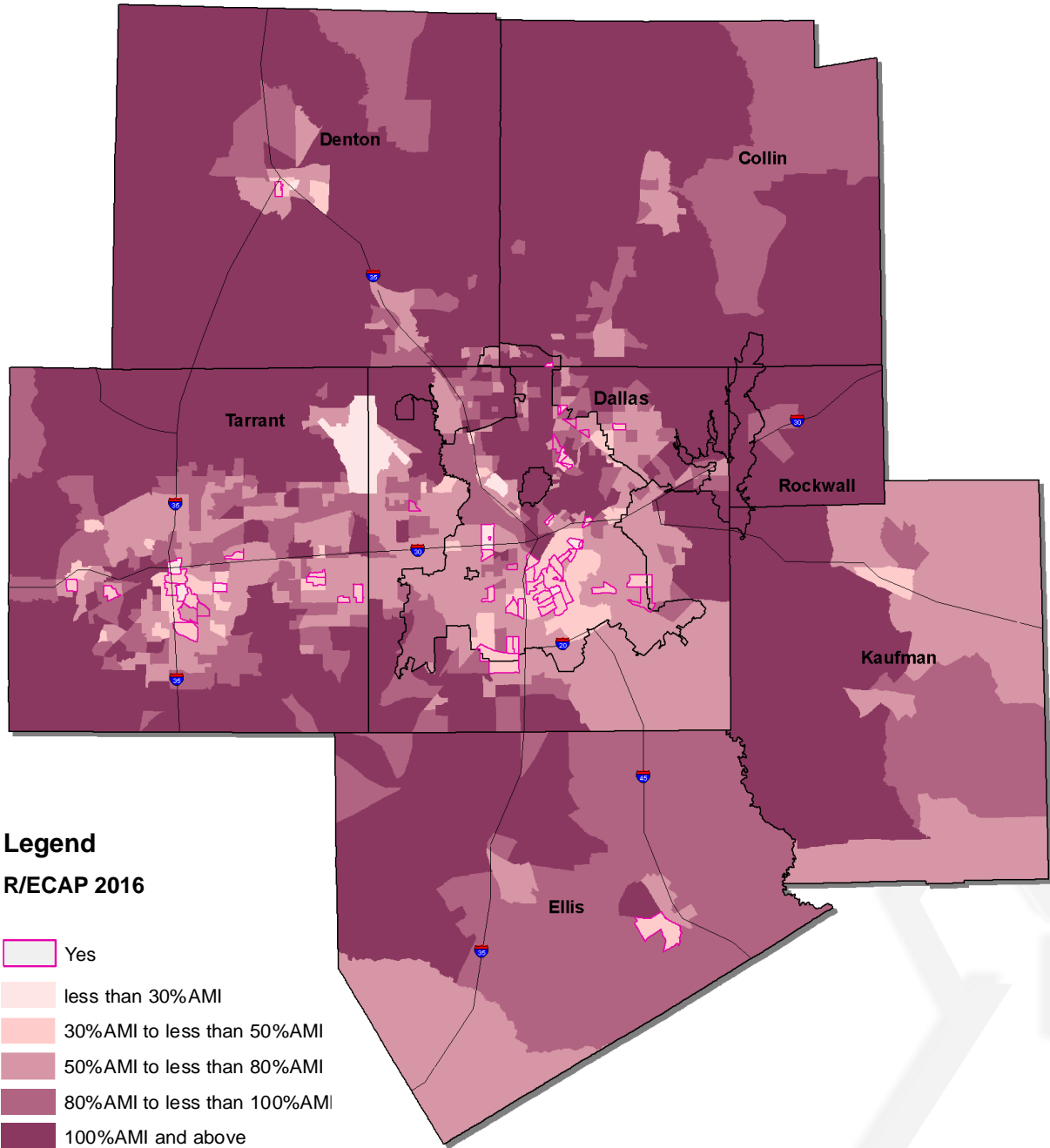
Figure 138: Median income by census tract and R/ECAPs, Dallas, Tarrant, Collin, Denton, Kaufman, Rockwall, and Ellis Counties

Housing Production and Renovation in Dallas

In "State of Dallas Housing", bcWorkshop reported significant variations in housing production. The construction of new, higher-priced housing continued to rise and to exceed the share of less expensive housing, which continued to decline (Figure 139). The report also found that "new housing built in North Texas from 2011 to 2016 was largely concentrated in areas that are the least affordable to Dallas' median income households of color" (bcWorkshop, 2018).

Figure 139: Housing production by price, Dallas (Source: bcWorkshop)

The following maps (Figure 140) show respectively the density of new construction and renovation permits issued in Dallas (2017) as well as the list of areas where such activities occurred between 2011 and 2017.

New Construction

Uptown,
Lower Greenville,
Old East Dallas,
Midway Hollow,
Preston Hollow,
Preston Hollow North,
Southwest Medical District and
Walnut Hill neighborhoods

Renovation

Old East Dallas,
Northwest Dallas,
Kessler Park,
Buckner Terrace,
Red Bird,
Far North Dallas
Downtown and
Uptown neighborhoods
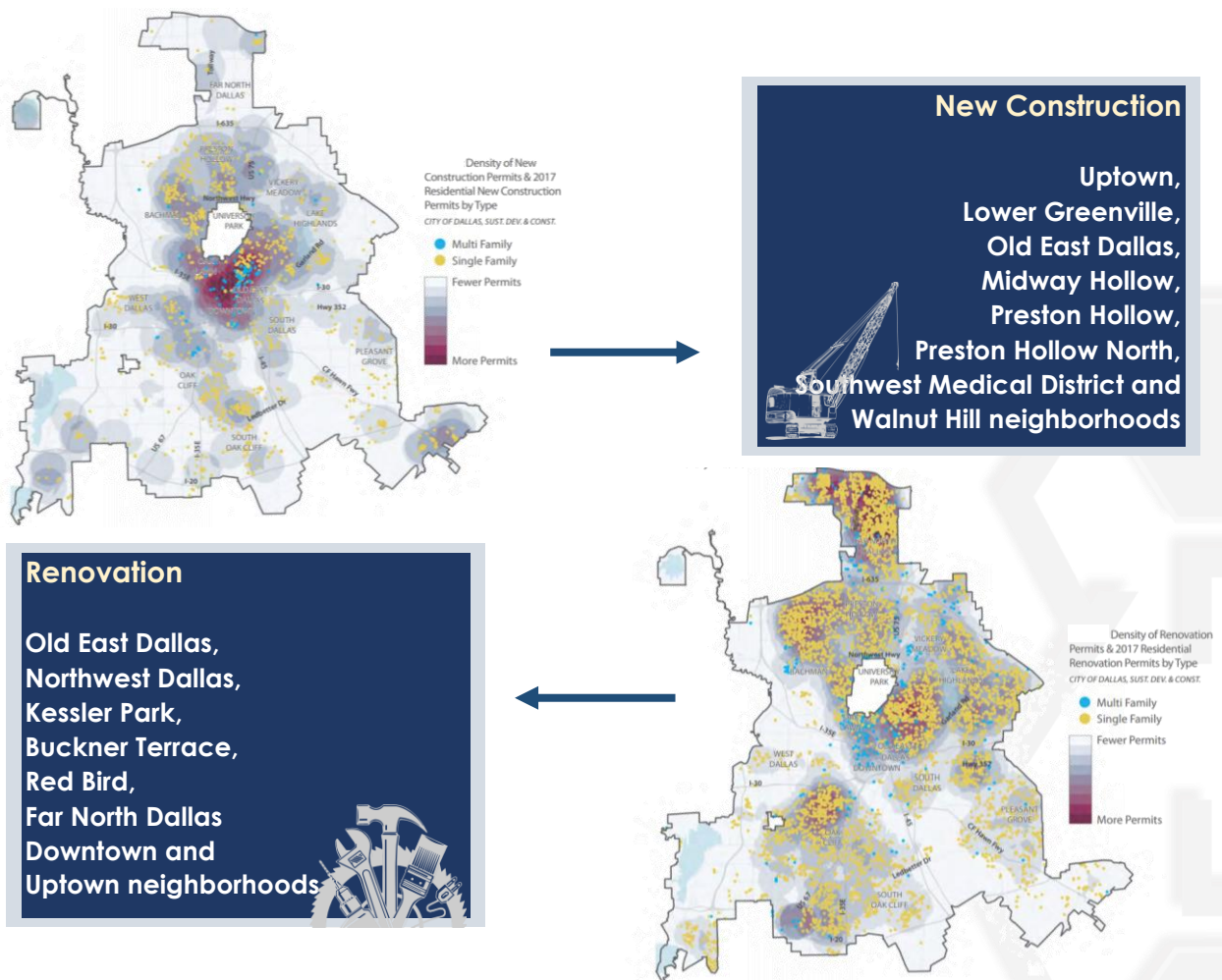
Figure 140: New construction density (left) and renovation permit density (right), Dallas (source: bcWorkshop)

Market Pressure, Gentrification and Opportunity Zones

A preeminent concern voiced throughout the process of public engagement and consultation was the deeply felt impacts of gentrification and the loss of affordable housing, which in turn exacerbate neighborhood inequities and disproportionate needs.

In an effort to help localities direct and prioritize Opportunity funds (federal incentives from The Tax Cuts and Jobs Act), the Urban Institute developed a metric to gauge high levels of socioeconomic change usually associated with gentrification. The index is composed of four indicators of change (2000-2016):

- "Percentage point change in the share of residents with a bachelor's degree or higher
- Dollar change in median family income
- Percentage point change in the share of non-Hispanic white residents (which, for example, can help to explain difference in assets, not just incomes) and
- Change in average housing burden" *Source: Urban Institute, 2018*

The following map shows the census tract flagged as having experienced sizeable socioeconomic changes across these indicators (blues hash marks), as well as designated Opportunity Zone (turquoise boundaries) and R/ECAPs (pink).

The census tracts flagged as located far northwest Dallas, northeast Dallas by Vickery Meadow, downtown and north Oak Cliff. Two opportunity zones matched with two flagged census tracts and three with R/ECAPs. Other opportunity zones are adjacent to R/ECAPs, with three exceptions.
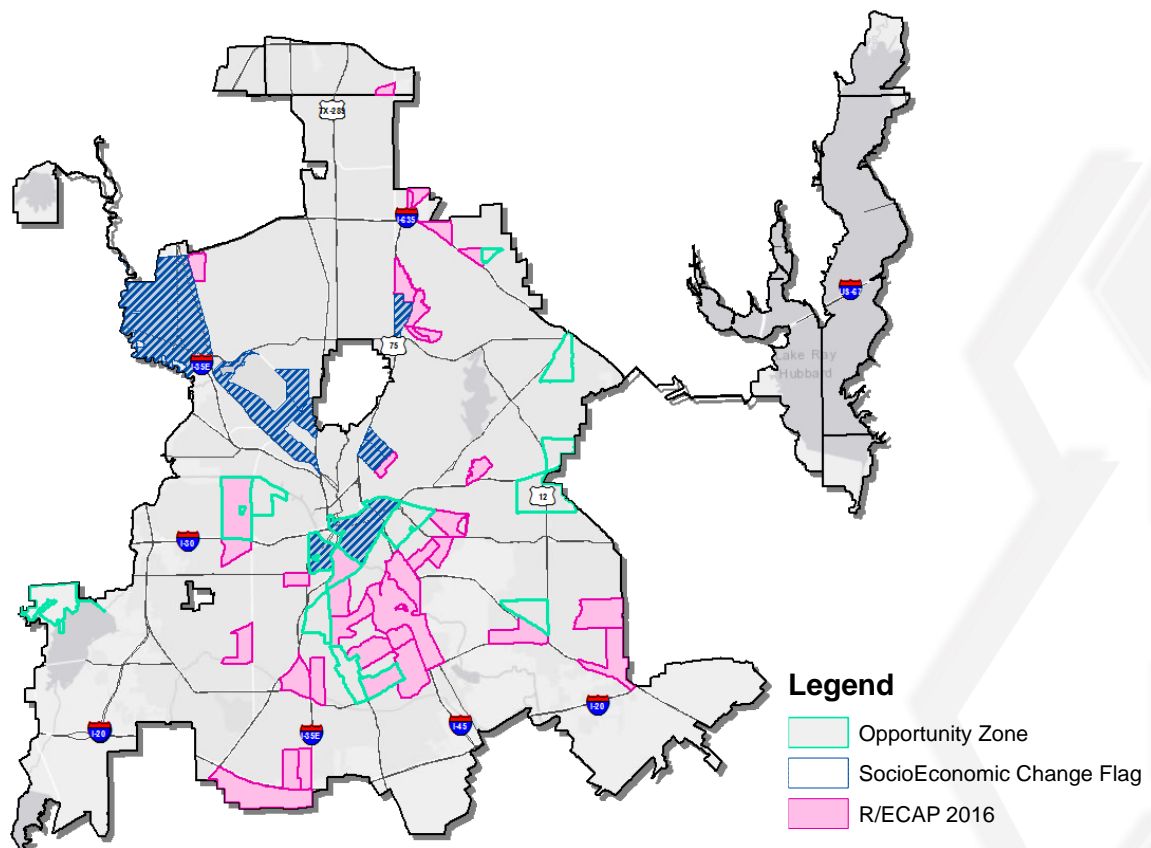
Figure 141: Opportunity zones, R/ECAPs and census tracts flagged for sizable socioeconomic change

Housing Policy

On March 12, 2017, the Dallas City Council Housing Committee established three goals for the development of a comprehensive strategy for housing: 1) Create and maintain available and affordable housing throughout Dallas, 2) Promote greater fair housing choices and 3) Overcome patterns of segregation and concentrations of poverty through incentives and requirements. A housing policy was approved in May 2018.
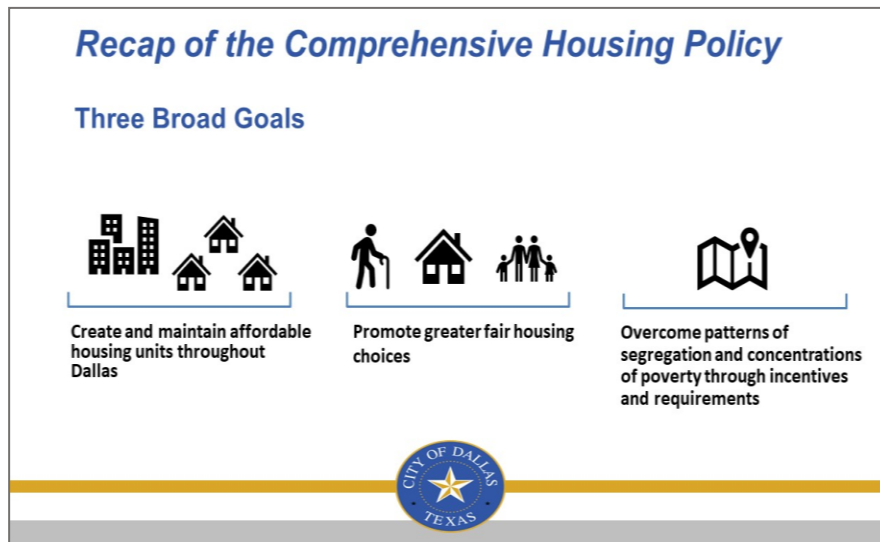
Figure 142: Dallas housing policy three broad goals

Strategies in the housing policy include:

New Construction and Substantial Rehabilitation
The purpose of this program is to provide financial assistance to new developments or substantial rehabilitation developments, where such assistance is necessary, and appropriately incentivize private investment for the development of quality, sustainable housing that is affordable. Funds may be used for projects to: 1) build new single-family with five or more homes, 2) build new multifamily rental housing with five or more units, or 3) substantially rehabilitate multifamily rental housing greater than five units. The City shall award, when funds are available, through a competitive Notice of Funding Availability (NOFA) or Request for Applications (RFA) process in accordance with the program's scoring policy.

Rental Rehabilitation and Reconstruction
Provides an all-inclusive repair and rehabilitation program for single-family (1-4) rental units. The Home Improvement and Preservation Program (HIPP) expands to offer a repayment loan program to landlords who lease to low-income households, with the purpose of making needed improvements and preserving affordable housing. HIPP is designed to finance home improvements and address health, safety, accessibility modifications, reconstruction and structural/deferred maintenance deficiencies.

Direct Assistance

Enable persons to purchase homes within the City by providing direct funding assistance to homebuyers and enable persons using housing vouchers to access quality, sustainable housing throughout Dallas by providing direct assistance to eligible landlords and developers.

The housing policy is guided by a **Market Value Analysis**. The MVA identifies nine market types (A through I) on a spectrum of residential market strength or weakness. The market classification is based on various indicators including: median home sales prices, variation sales prices, percent owner-occupied, percent new construction, percent rehabilitation, percent public subsidy, percent code violations, percent of vacant homes, percent foreclosure filings and household density.

Based on the MVA, the housing policy identified **geographic focus areas**. The targeted areas are classified as follows:

Redevelopment Areas (4)
Catalytic project scheduled to occur within the next 12 months that is supported by a third-party, independent market analysis. Project must include new housing production with affordable units offered for sale or rent to a mix of income bands.

Stabilization Areas (8)
Weaker real estate markets (G,H,I) surrounded by stronger markets (A-E) and at risk of displacement based on market conditions and scheduled redevelopment projects.

Emerging Market Areas (3)
A blend of middle markets (C,D,E) with mostly G,H,I markets. Need intensive environmental enhancements, public infrastructure assessments and corrective plans, code enforcement, master planning and formalized neighborhood organizations to be prepared for real estate investment.

The following maps overlay these targeted areas with R/ECAPs in Dallas.
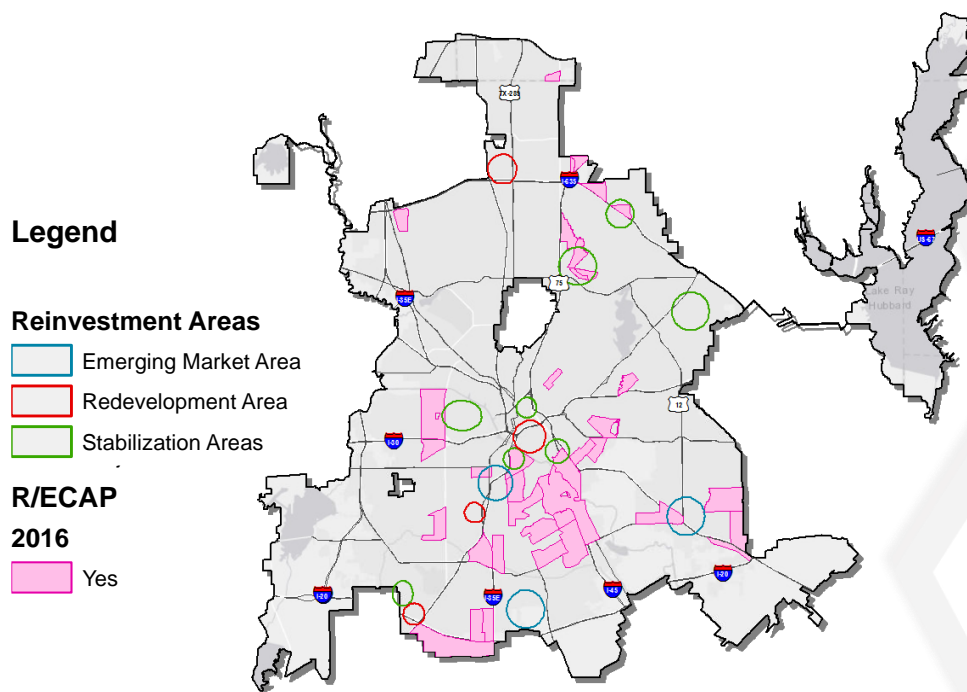
Figure 143: Housing policy's target areas and R/ECAPs

Figure 144 shows Dallas' production goals by income band to be served for both renters and owners.

The policy seeks to "create 3,733 homeownership units: 55% market rate, 45% low/mod-income. Create 2,933 rental units: 40% market rate, 60% low/mod-income. The policy focuses on serving families at 30% to 120% Area Median Income (AMI)."

Table 59 shows the number (and proportion) of households within different income bands that are cost burdened and severely cost burdened in Dallas (both renters and owners).

Figure 144: Housing policy production goals by income bands and housing tenure

In Dallas, a substantially greater share of households at and below 30% and 50% HAMFI were cost burdened and severely cost burdened, compared to any other income group (2015). The rates of cost burden and severe cost burden issues are greater for renters than for owners and the greatest for renters at and below 30 HAMFI. About eight out of 10 renter families at 30% HAMFI are cost burdened in Dallas; close to 30,000 households with an income below 50% HAMFI were cost burdened in 2015.

Table 59: Cost burdened and severely cost burdened households by income brackets and housing tenure, Dallas

Dallas, Texas (2015)					
Income by Cost Burden (Renters only)	Cost burden > 30%	%	Cost burden > 50%	%	Total
Household Income less-than or= 30% HAMFI	57,575	**79%**	46,910	**64%**	72,830
Household Income >30% to less-than or= 50% HAMFI	38,270	**75%**	10,020	**20%**	50,985
Household Income >50% to less-than or= 80% HAMFI	18,130	**32%**	2,490	**4%**	56,555
Household Income >80% to less-than or= 100% HAMFI	3,625	**14%**	380	**2%**	25,030
Household Income >100% HAMFI	3,170	**5%**	340	**0.5%**	70,000
Total	**120,770**		**60,140**		**275,395**
Income by Cost Burden (Owners only)	Cost burden > 30%	%	Cost burden > 50%	%	Total
Household Income less-than or= 30% HAMFI	15,860	**71%**	11,490	**51%**	22,425
Household Income >30% to less-than or= 50% HAMFI	14,095	**56%**	6,060	**24%**	25,105
Household Income >50% to less-than or= 80% HAMFI	11,655	**35%**	3,335	**10%**	33,530
Household Income >80% to less-than or= 100% HAMFI	4,080	**22%**	995	**5%**	18,925
Household Income >100% HAMFI	8,890	**9%**	1,520	**1%**	101,865
Total	**54,580**		**23,400**		**201,855**

3. Contributing Factors of Disproportionate Housing Needs

During the first round of public meetings and focus groups, participants were asked to identify contributing factors to the seven fair housing issues at heart of the AFH tool. The issue of disproportionate housing needs ranked third in generating the most comments from participants. Indeed, close to 17% of all comments were related to disproportionate housing needs.

The most cited set of contributing factors to disproportionate housing needs included **the loss of affordable housing**, **displacement** due to economic pressure, **rising rents and costs of living**, as well as the lack of affordable units in range of sizes. A great majority of residents reported facing "unacceptable" tax increases, a considerable pressure intensified by growing repair needs and limited resources. A participant said that "people don't have enough income to pay rent"; another added that "the minimum wage is not the living wage … which cannot cover their expenses". Residents also expressed their concerns regarding the growing demolition trend and conversion of affordable housing into high-end apartments, as well as the aggressive investors seeking to exploit neighborhoods' and residents' economic vulnerability.

The second most cited set of contributing factors to disproportionate housing included the **lack of public and private investments** and lack of **code and law enforcement**. Residents reported that the lack of code enforcement and resulting dilapidated homes continued to not only deter families from move in but also private investments to occur. Participants also attributed the lack of investments and developments to city policies and HUD policies as being obstacles to new development. Residents reported on the need for streets improvement and infrastructure upkep. Public meeting participants also stated greater law enforcement and police coverage would effectively deter crime and contribute to overall community safety.

The third category of contributors to disproportionate housing needs was **discrimination**. The issue of discrimination manifests itself in many compounding ways: through lending discrimination, evictions and source of income discrimination. The issue of **lending discrimination** was relatively preeminent; participants expressed the obstacles they faced in accessing and securing financial support. A resident explained that "people trying to finance a home in this area have a problem getting financing; bankers are hesitant to help those in this area". Others added "why can't bank give more loans to help people move for improvement" and "lending institutions don't give the public the information they need". Participants stated that the ability of landlords to refuse vouchers also significantly contributes to disparities and disproportionate needs. Residents also expressed their concerns about the inequitable and limited housing options that formerly incarcerated individuals must face.

Finally, residents said another set of major contributors to disproportionate needs included the growing number of **aging homes**, the need for **major repairs** and the fact that l**andlords fail to maintain properties** up to code. Many residents, especially in west Dallas, explained that they are facing major foundation issues and continue to struggle to secure funding to repair their homes. A resident explained "the housing stock in the district is old. My father built our house in 1945, we didn't have drainage even a sewer system". Another added that "people feel that earthquakes have caused foundation issued and that insurance have refused to repair". Correspondingly, residents expressed their concerns about the lack of funding option to address these issues, especially for seniors.

<u>Sample AFH public engagement</u>

The following comments from public meetings, focus groups and surveys express public participants' views about housing needs, inequities and disparities in access to opportunities:

Answering "What are the contributing factors to disproportionate housing?"

- "We need lots of production of housing that is affordable"
- "Properties are beginning to flood"
- "Increase of taxes"
- "Apartments are supposed to set aside some to low-income but they aren't, or they are tearing them down"
- ""Dumping on vacant lots"
- "Foundations and roofing are the most important housing problems in the district"
- "It should be some funding especially for seniors to repair these houses"
- "Income and tax base. Oak cliff and South Dallas are experiencing this issue"
- "I don't understand why so much money is given to investors but they can't give us the same money to fix our houses"
- "Our taxes are very high, that is unacceptable"
- "They say the Trinity Road will help us, but they push *[us]* out of the district by upgrading the neighborhood. When you bring investors to build housing that costs $4,000 a month, how can a person who lives on a fixed income of $700 can afford it?!"
- "Lending discrimination: in the area people have a problem to get a loan" (District8)
- "The City doesn't do anything to enforce its own laws. Many violations you see around here. Who wants to move in a neighborhood like this?"
- "Bring business in the neighborhood, but half of people working here come from North Dallas"
- "In District 13, we have less options where people can live"
- "City of Dallas, Dallas County and Dallas Housing Authority need to have more communication with the community members"
- "No one is going to invest money in the South of Dallas"
- "Lack of funding for seniors that want to repair their homes"
- "Years of non-existent code enforcement"
- "City doesn't care if communities get bulldozed and eliminated"
- "More police or security presence to deter drug trafficking among youth in my neighborhood"
- "The taxes are too high and people are losing their homes"
- "Lack of access to opportunity due to high housing costs"
- ""Quality low to middle income housing options in all districts throughout Dallas"
- "When I say lending discrimination, I mean that /I have been told many times that I need to bring my husband with me to complete loans. I have 7 houses, but I had them in low income areas because I could not get a loan"
- "More mixed income and mixed-use developments. I'd like to see affordable housing component in each new housing project – a reasonable amount of affordable housing units, up to 30%"
- "Police coverage and code compliance"

This page left black intentionally

PUBLICLY SUPPORTED HOUSING

This page left black intentionally

C. Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

1ai. *Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?*

This section follows HUD's methodology and groups publicly supported housing programs into four categories: Public Housing, Project-Based Section 8, the Housing Choice Voucher program, and finally Other Multifamily housing which include Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities.

Table 60 provides the participation rates for the aforementioned housing programs by race and ethnicity for Dallas and the region. Dallas counts an estimated 20,511 households residing in publicly supported housing units, which represents more than 4.5% of Dallas's total household population (453,786 households). Furthermore, Dallas accounts for 48% of households residing in publicly supported housing units within the DFW region. Overall, black households characterize the largest group (17,169 households) living in publicly supported housing, followed by white (1,482), Hispanic (1,446), and Asian/PI (414) households. More specifically, black households represent a majority in all programs. Based on the size of the Dallas programs, the largest counts of white, black, Hispanic, and Asian/PI households participate in the HCV program.

In the study area, the region counts an estimated 42,522 households residing in publicly supported housing units, which represents almost 2% of the region's total household population (2,333,530 households). In Dallas and the DFW region, black households reside in publicly supported housing units at rates (84% and 70%) significantly greater than their population distribution (25% and 15%) while the Hispanic population appears particularly underrepresented at only 7% in Dallas and 8% in the region. Black households represent the largest group in all programs except Other Multifamily where white households represent the greatest number of recipients.

Table 60: Housing type and race/ethnicity, Dallas and Region

(Dallas, TX CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	107	3.53%	2,636	87.05%	273	9.02%	10	0.33%
Project-Based Section 8	519	16.02%	2,164	66.79%	416	12.84%	136	4.20%
Other Multifamily	82	22.65%	169	46.69%	88	24.31%	22	6.08%
HCV Program	774	5.57%	12,200	87.76%	669	4.81%	246	1.77%
(Dallas-Fort Worth-Arlington, TX) Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	326	7.49%	3,515	80.75%	434	9.97%	76	1.75%
Project-Based Section 8	1,827	26.07%	3,507	50.04%	1,165	16.62%	474	6.76%
Other Multifamily	623	45.98%	333	24.58%	181	13.36%	209	15.42%
HCV Program (Local Data)	4,679	0.17%	22,827	0.81%	1,738	0.06%	608	0.02%

1aii. *Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.*

The comparative racial/ethnic demographic portraits of each program at the jurisdictional and regional levels rely primarily on HUD-provided data and local data. The study combines local information from the jurisdictions participating in the North Texas Regional Housing Assessment to create a regional demographic profile of the Housing Choice Voucher program.

The racial/ethnic groups' shares differ substantially between the city and region. For the Project-Based Section 8 program, the Dallas share of black households (67%) exceeds the regional proportion (49%). The share of Hispanic households residing in Project-Based Section 8 units in the region (17%) exceeds their share in Dallas (13). The share of Asian/PI households in Project-Based Section 8 units in Dallas (4%) remains less than the regional share (7%).

As for the Public Housing program, black households represent a greater share in Dallas (87%) than the region (77%). Correspondingly, white households represent a lower proportion in Dallas (7%) compared with the region (4%).The portion of Hispanic households seems comparable between Dallas and the region (10%)while Asian/PI households only represent 3% in the region and 0.3% in Dallas. As for the Other Multifamily program, black households represent a greater share in Dallas (47%) than the region (25%). Correspondingly, white households represent a lower proportion in Dallas (23%) compared with the region (46%). Hispanic households represent a represent greater share in Dallas (24%) than the region (13%) while Asian/PI households represent 15% in the region and 6% in Dallas. The HCV program in Dallas predominately serves black households (88%) at a rate greater than the overall DFW region (81%). The shift in racial composition occurs to white households where the Dallas program has a 6% share of white households, but the region has less than a 1% share. Hispanic households in McKinney and overall region participate at a rate of 6%. Asian/PI households account for 2% of Dallas recipients but less than 1% of regional recipients.
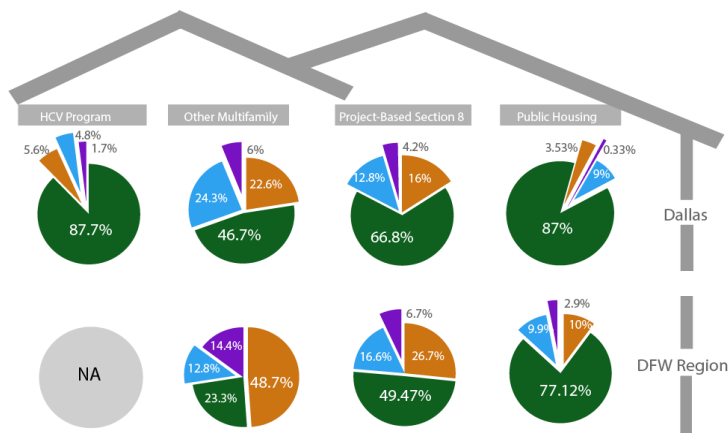
Figure 145: Housing type by race and ethnicity, Dallas and region

Table 61: HCV program's racial and ethnic composition based on local data (NTRHA)

(Dallas-Fort Worth-Arlington, TX) Region	White		Black		Hispanic		Asian or Pacific Islander	
HCV Program (Local Data)	4,679	16.60%	22,827	80.96%	1,738	6.16%	608	2.16%

1aiii. *Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.*

Race/Ethnicity and Income Eligibility

The HUD-provided table includes race/ethnicity data for the total population in the jurisdiction and for persons meeting the income eligibility requirements for publicly supported housing programs. The study includes three additional rows. One row displays the aggregate percentage of income eligible households (0-80% AMI) for each race/ethnicity group. A second row captures program participation rates, which is the percentage of participants in publicly supported housing program based on total income eligible population for each racial/ethnic group. The final row identifies the total proportion of each racial and ethnic group in all publicly supported housing programs combined.

Table 62 shows that white households make up 39% of the total city population, followed by 30% Hispanic, 26% Black, and 3% Asian/PI households. The racial/ethnic composition of publicly supported housing programs in Dallas differs from that of the region. The share of black households residing in publicly supported housing remains lower in the region (71%) than in Dallas (84%). Conversely, the proportions of white (7%) and Hispanic (7%) households represent greater proportions in Dallas than in the region (respectively 18% and 8%). In Dallas, the white, Asian/PI, and Hispanic populations represent greater than expected proportions of the Project-Based Section 8 and Other Multifamily programs. The black population represents a greater proportion of the Public Housing and HCV programs. These trends appear similar at the regional level.

In Dallas, 70% of Hispanic households, 69% of black households, 46% of Asian/PI households, and 29% of white households have income eligibility. About 20% of income eligible black households participate in publicly supporting housing programs, primarily in the HCV program. While 70% of Hispanic households have income eligibility, only 2% participate in publicly supported housing programs, primarily in HCV programs. Similarly, while 46% of Asian or Pacific Islander meet income eligibility requirement, only about 6% participate in publicly supported housing programs. Finally, 3% of income eligible white households live in publicly supported housing, and they primarily receive assistance through the HCV program.

In the region, all races and ethnicities have lower eligibility rates than Dallas; for example, over 61% of Hispanic households have income eligibility. Region-wide, over 55% of black households remain eligible for assistance based on income. The income eligibility rests at 27% for the white population and 33% for the Asian/PI population. Dallas has greater participation rates of income-eligible households than the region. While the participation rates between the city and region remain relatively close for white and Hispanic households, a five percentage point increase occurs between the city (20%) and regional (15%) rates for black households.

Table 62: Racial/ethnic composition and participation rate by housing program, Dallas and region

(Dallas, TX CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	107	3.53%	2,636	87.05%	273	9.02%	10	0.33%
Project-Based Section 8	519	16.02%	2,164	66.79%	416	12.84%	136	4.20%
Other Multifamily	82	22.65%	169	46.69%	88	24.31%	22	6.08%
HCV Program	774	5.57%	12,200	87.76%	669	4.81%	246	1.77%
Total From all Programs		7.23%		83.71%		7.05%		2.02%
Total Households	180,765	39.13%	121,260	26.25%	136,729	29.60%	15,032	3.25%
0-30% of AMI	17,145	19.55%	37,105	42.31%	29,065	33.14%	2,782	3.17%
0-50% of AMI	28,555	17.78%	58,465	36.41%	62,060	38.64%	4,656	2.90%
0-80% of AMI	51,580	20.86%	83,990	33.97%	96,314	38.95%	6,866	2.78%
Percentage of Income Eligible		28.53%		69.26%		70.44%		45.68%
Participation Rate based on Income Eligible Population		2.87%		20.44%		1.50%		6.03%
(Dallas-Fort Worth-Arlington, TX) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	326	7.49%	3,515	80.75%	434	9.97%	76	1.75%
Project-Based Section 8	1,827	26.07%	3,507	50.04%	1,165	16.62%	474	6.76%
Other Multifamily	623	45.98%	333	24.58%	181	13.36%	209	15.42%
HCV Program (HUD data)	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program (Local Data)	4,679	16.60%	22,827	80.96%	1,738	6.16%	608	2.16%
Total From all Programs		17.53%		70.98%		8.27%		3.21%
Total Households	1,348,425	57.78%	362,115	15.52%	466,931	20.01%	114,143	4.89%
0-30% of AMI	104,295	37.22%	77,243	27.57%	79,215	28.27%	13,070	4.66%
0-50% of AMI	179,100	32.49%	129,423	23.47%	173,909	31.54%	23,463	4.26%
0-80% of AMI	363,800	38.65%	199,927	21.24%	286,859	30.48%	38,118	4.05%
Percentage Income Eligible		26.98%		55.21%		61.43%		33.39%
Participation Rate based on Income Eligible Population		2.05%		15.10%		1.23%		3.59%

b. Publicly Supported Housing Location and Occupancy

Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

Sections 811 and 202 Supportive Housing

As depicted by the map and table below, nine out of the 11 supportive housing developments are located in census tract with a nonwhite share 20% to 40% greater than the city average (darkest shades of green). Distinctively, the Fowler Christian Apartments II and III are located in a census tract with a greater white population share than the city average. These two developments also comprise a significantly lower proportion of extremely low-income households compared to other 202 and 811 supportive housing developments The Fowler Christian Apartments II and III also contain the highest proportions of HUD-assisted households with a disability (respectively 18% and 11%) amongst 202 housing developments.
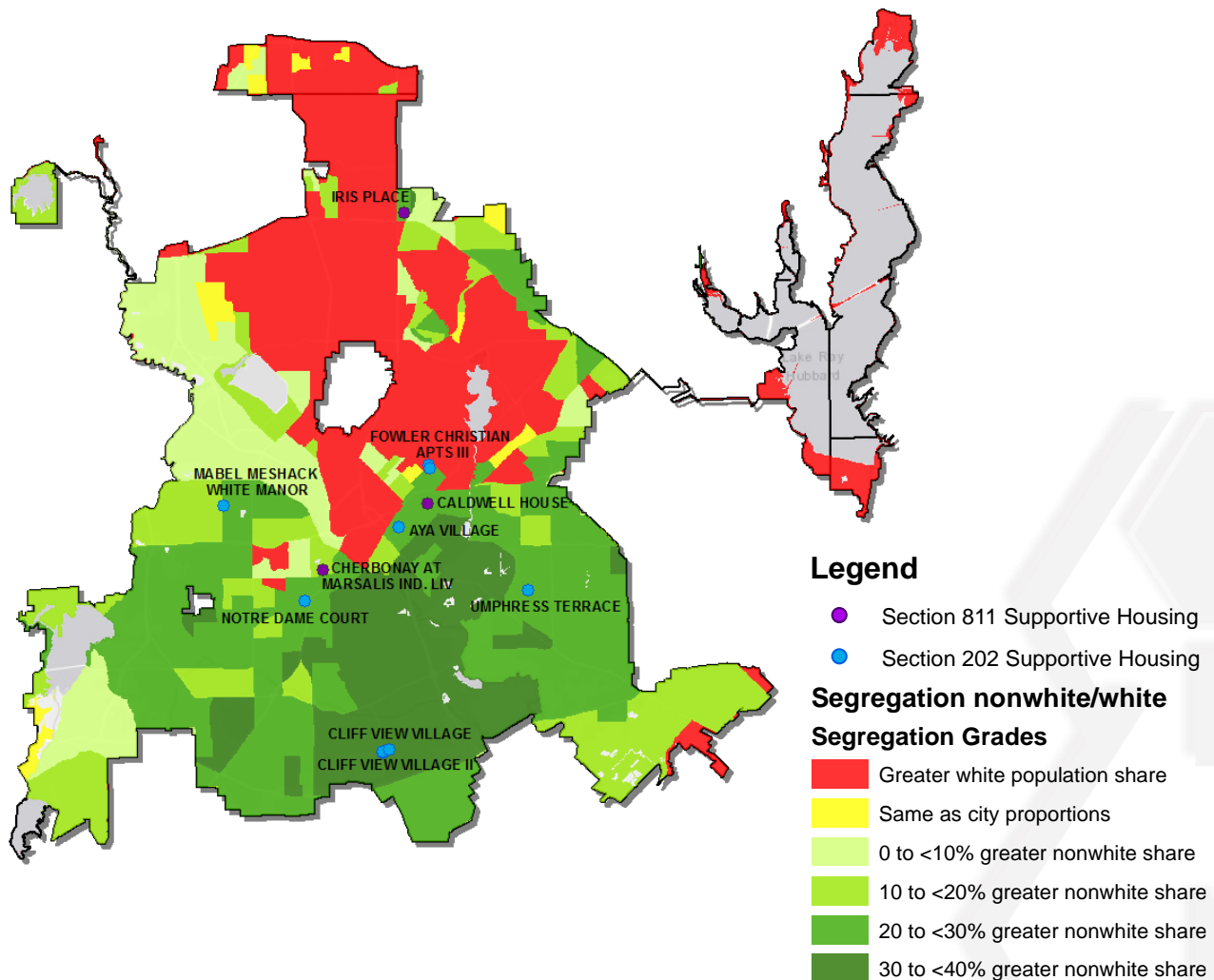
Figure 146: Sections 202 and 811 supportive housing and patterns of segregation, Dallas

Legend

- Section 811 Supportive Housing
- Section 202 Supportive Housing

Segregation nonwhite/white
Segregation Grades

- Greater white population share
- Same as city proportions
- 0 to <10% greater nonwhite share
- 10 to <20% greater nonwhite share
- 20 to <30% greater nonwhite share
- 30 to <40% greater nonwhite share
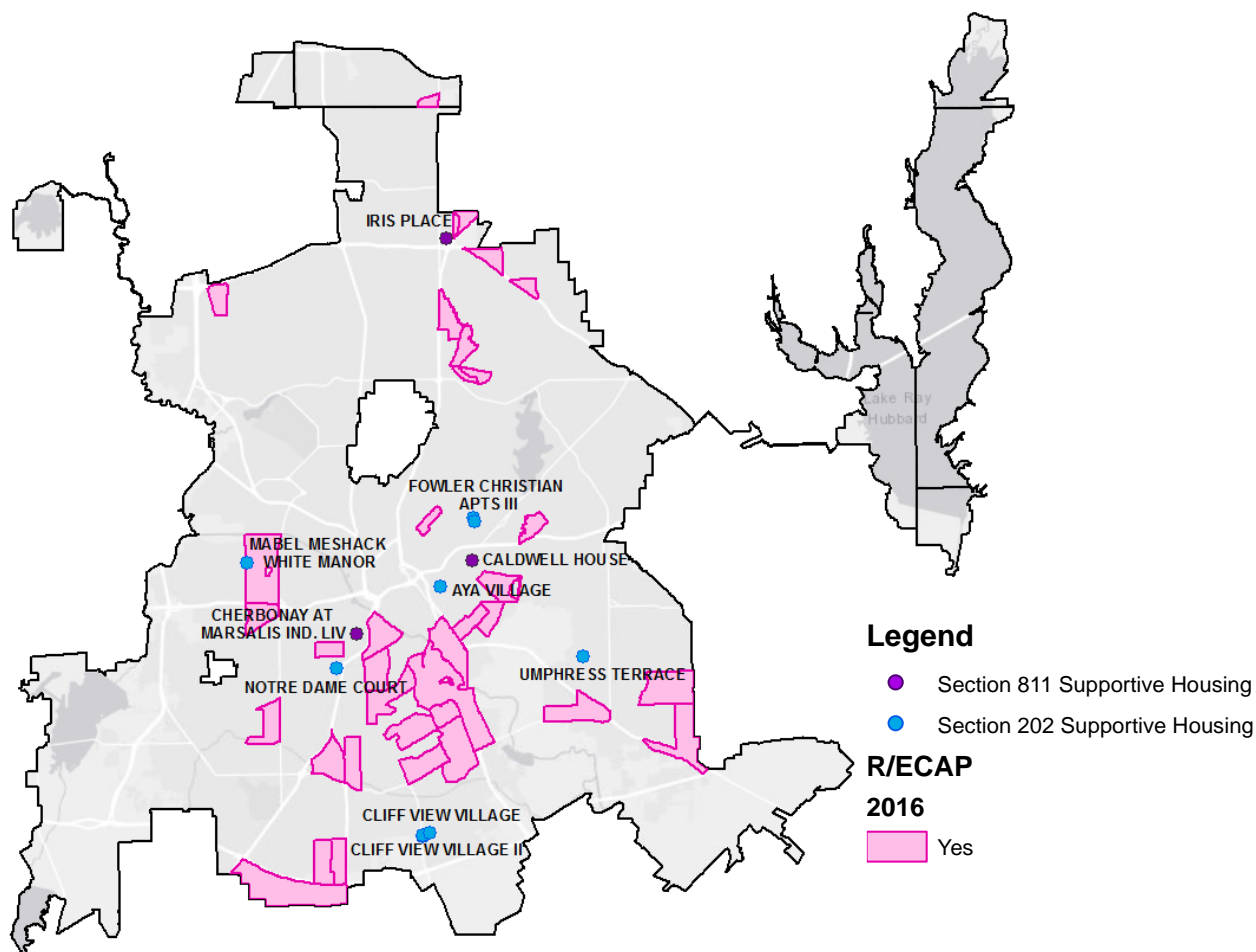
Figure 147: Sections 202 and 811 supportive housing and R/ECAPs, Dallas

Nine supportive housing for elderly (Section 202) and three for persons with disabilities (Section 811) exist within the city of Dallas. The Mabel Meshack White Manor (Section 202), which has the second largest number of subsidized units, is located within a R/ECAP census tract. While all other properties are located outside of R/ECAP census tracts, the poverty rate exceeds 20% in the census tracts shared by eight out of the 11 supportive housing developments.

The Fowler Christian Apartments II and III, which contain the highest proportions of HUD-assisted households with a disability (respectively 18% and 11%) amongst 202 supportive housing developments, appear in a nonwhite census tract with a low poverty rate. Overall, the majority of the Section 202 and 811 housing developments exist in the southern sector of Dallas, but most remain located outside R/ECAP census tracts.

Table 63: Sections 202 and 811 supportive housing, percent nonwhite, poverty rate and segregation grade

Program	Name	Number Subsidized units	Percent VLI	Percent ELI	Percent assisted HHWD	R/ECAP 2016	Percent Nonwhite	Poverty Rate	Segregation Grade
202_PRAC	CLIFF VIEW VILLAGE	28	100	86	0	0	99	20	6
202_PRAC	MABEL MESHACK WHITE MANOR	65	100	92	3	1	91	55	5
202_PRAC	AYA VILLAGE	29	100	89	7	0	90	34	5
202_PRAC	CLIFF VIEW VILLAGE II	27	100	88	0	0	97	35	6
202_PRAC	FOWLER CHRISTIAN APARTMENTS II	20	95	57	18	0	29	11	1
202_PRAC	CLIFF VIEW VILLAGE III	27	100	88	0	0	99	20	6
202_PRAC	UMPHRESS TERRACE	53	98	83	2	0	90	24	5
202_PRAC	NOTRE DAME COURT	68	100	93	1	0	92	24	5
202_PRAC	FOWLER CHRISTIAN APTS III	36	100	59	11	0	29	11	1
811_PRAC	IRIS PLACE	18	100	89	100	0	91	29	5
811_PRAC	CALDWELL HOUSE	6	Null	Null	Null	0	94	39	5
811_PRAC	CHERBONAY AT MARSALIS IND. LIV	11	Null	Null	Null	0	81	21	4
TOTAL		388				1			

PRAC: Project Rental Assistance Contract
VLI: Very Low-Income
ELI: Extremely Low-Income
HHWD: Households with a disability
R/ECAP: 1(Yes)/ 0 (No)
GS Focus Area: GrowSouth Focus Area
N/A: Not Applicable
Null: Missing Value

Segregation Grade (2015)

Nonwhite share 30% to 40% greater than jurisdiction: **6**
Nonwhite share 20% to 30% greater than jurisdiction: **5**
Nonwhite share 10% to 20% greater than jurisdiction: **4**
Nonwhite share 0% to 10% greater than jurisdiction: **3**
Nonwhite share similar to jurisdiction's share: **2**
Greater white population share than jurisdiction

Housing Choice Voucher

Housing Choice Voucher (HCV) families tend to be disproportionately members of protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. Therefore, examining the residential patterns of HCV with respect to R/ECAP and segregation patterns appears particularly relevant for assessing fair housing issues.

The participating jurisdictions to the North Texas Regional Housing Assessment provide local data regarding the residential patterns of HCV families. The research team geolocated 27,743 HCV families across the North Texas region. Dallas represents the home for 10,531HCV families.

HCV families tend to disproportionately reside in Dallas' most segregated neighborhoods (darkest green shades) and close to seven out of 10 families (69%) reside in a neighborhood of the highest segregation grades (5 or 6 = nonwhite population share between 20 and 40% greater than overall City).

As of 2016, Dallas includes 36 R/ECAPs (almost 10%) out of 380 total census tracts. An estimated 28% of the HCV families (n=3,000) residing in Dallas live in R/ECAPs. The number of HCV families in a R/ECAP ranges from one to 286, with an average of 83 HCV families in R/ECAP census tracts while the average number of HCV families in non-R/ECAP HCV-populated census tracts only reaches 22 or 39 in non-R/ECAPs with at least one HCV family. The concentration of HCV families seems disproportionately greater in R/ECAP as opposed to non-R/ECAP census tracts.
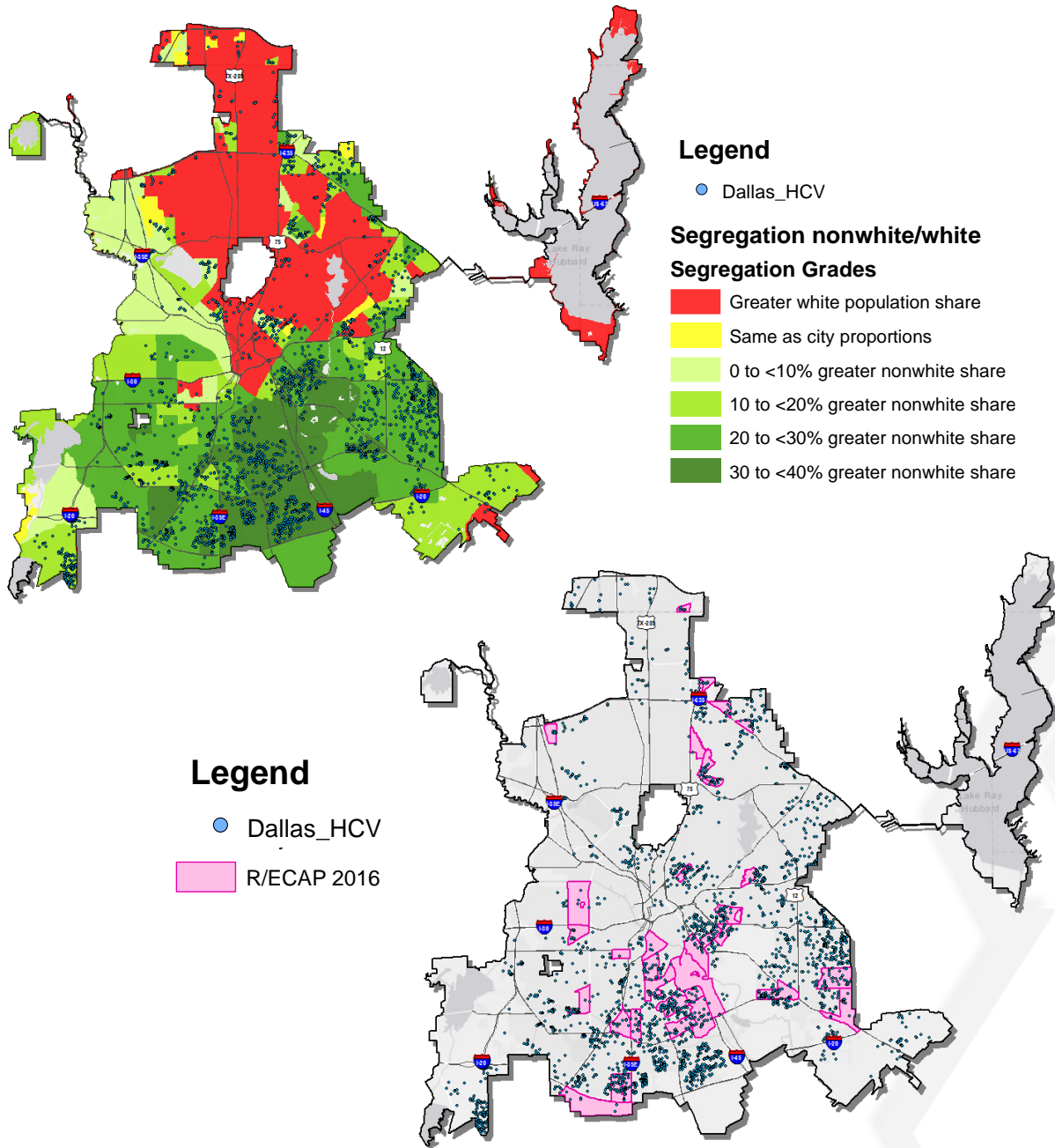
Figure 148: HCV residential patterns with respect to segregation and R/ECAPs, Dallas

Project-based Section 8

Among the 25 project-based Section 8 developments in Dallas, six are located within a R/ECAP census tract and five have a share of households with a disability of at least 30%.

For the developments located in R/ECAP census tracts, the poverty rate ranges from 44% to 57% and the concentration of nonwhite households from 62% to 97%. These R/ECAP census tracts have poverty levels and minority concentrations significantly higher than the qualifying R/ECAP thresholds (50% nonwhite and poverty rate of 40%).

None of the four project-based Section 8 developments with a 30% or greater share of households with disability appear within a R/ECAP census tract. For these developments, the poverty rate does not exceed 32% and the nonwhite concentration ranges from 10% to 67%.
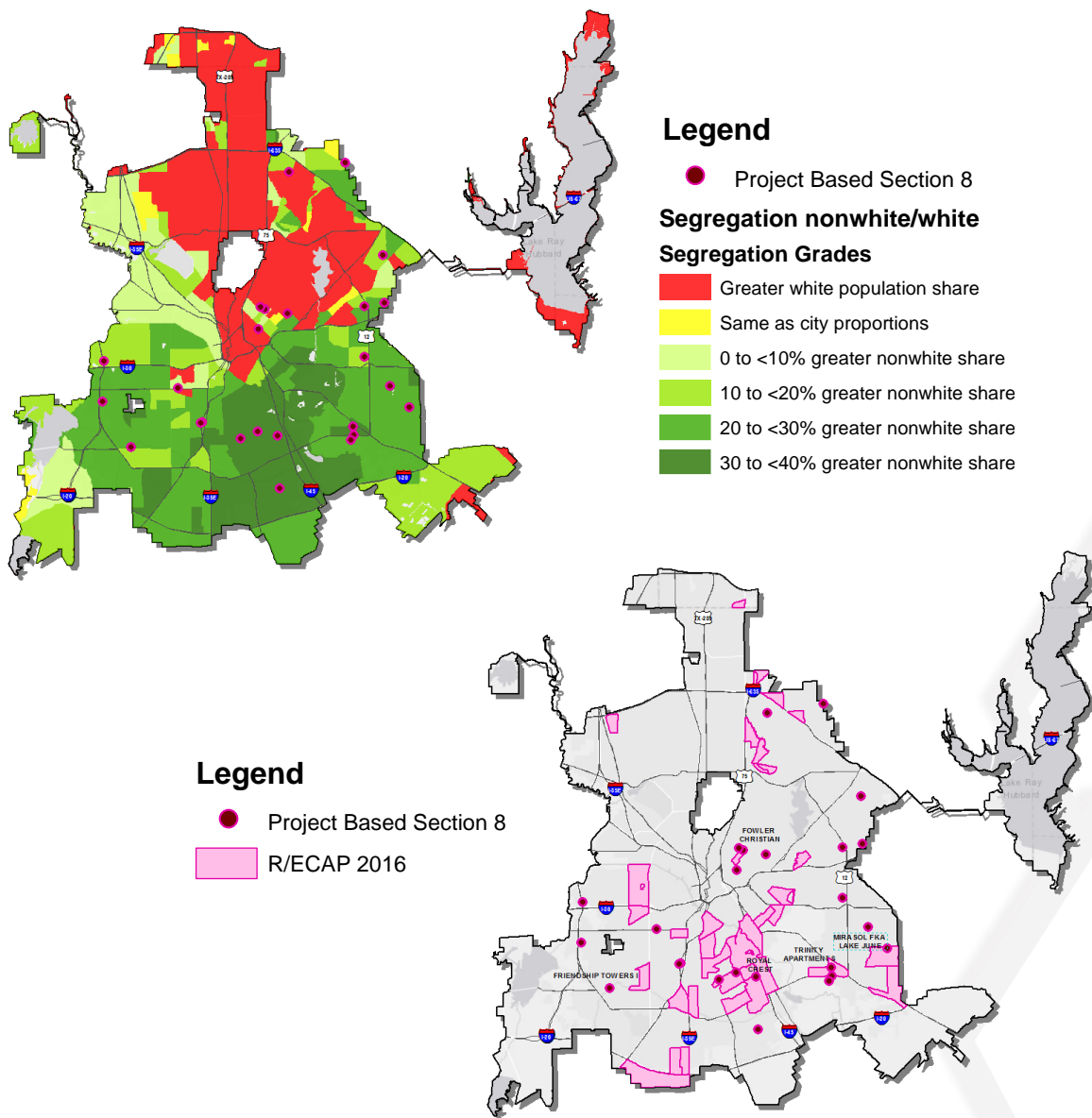
Figure 149: Project-based Section 8 location with respect to segregation and R/ECAPs

Table 64: Project-based Section 8, nonwhite concentration, poverty rate and R/ECAP status

Program label	Name	Subsidized units available	Percent VLI	Percent ELI	Percent assisted HHWD	Segregation Grade	R/ECAP16	Percent nonwhite	Poverty rate	GS FOCUS AREA	Neighborhood Plus Focus Area
Project Based Section 8	CASA TREVINO	85	100	85	14	3	0	70	21	<Null>	<Null>
Project Based Section 8	CATHEDRAL GARDENS	23	100	73	27	4	1	86	54	<Null>	<Null>
Project Based Section 8	CHEROKEE VILLAGE	61	100	89	12	6	1	98	57	DART Green Line	Pemberton Hill
Project Based Section 8	COLONIA TEPEYAC	280	98	85	12	4	0	82	37	<Null>	<Null>
Project Based Section 8	DICKINSON PLACE	116	100	96	4	1	0	42	30	<Null>	<Null>
Project Based Section 8	ESTELLE VILLAGE	288	100	90	11	6	0	97	35	Education Corridor	Bonnie View
Project Based Section 8	SILVER GARDENS FKA ECHAD	200	99	87	9	4	0	80	35	<Null>	Casa View
Project Based Section 8	FOREST GREEN MANOR	251	99	91	71	1	0	45	12	<Null>	<Null>
Project Based Section 8	FOWLER CHRISTIAN	144	99	59	30	1	0	29	11	<Null>	<Null>
Project Based Section 8	FRIENDSHIP TOWERS I	150	99	89	59	5	0	94	20	N/A	N/A
Project Based Section 8	GREATER BETHLEHEM PLAZA	30	100	90	27	4	0	89	35	N/A	Skyline Place APts CRP
Project Based Section 8	TRINITY APARTMENTS	143	100	84	10	6	1	98	57	DART Green Line	Pemberton Hill
Project Based Section 8	MIRASOL FKA LAKE JUNE	100	99	83	10	5	1	91	46	N/A	N/A
Project Based Section 8	LAKELAND MANOR	171	99	93	80	4	0	81	31	N/A	N/A
Project Based Section 8	NORTHGATE VILLAGE	167	99	68	1	4	0	84	32	N/A	Family Corridor
Project Based Section 8	PLEASANT VILLAGE APARTMENTS AKA CRE	130	100	96	9	5	0	98	31	DART Green Line	Pemberton Hill

Project Based Section 8	PRAIRIE CREEK VILLAGE APARTMENTS	118	100	85	5	5	0	91	29	N/A	Pleasant Grove
Project Based Section 8	PYTHIAN MANOR	75	100	88	9	6	0	99	28	Lancaster Corridor	N/A
Project Based Section 8	RIDGECREST TERRACE APARTMENTS	246	99	93	8	5	0	94	28	N/A	Arcadia Park
Project Based Section 8	SHILOH VILLAGE APARTMENTS	167	96	77	1	5	0	94	38	N/A	N/A
Project Based Section 8	PARKS AT WYNNEWOOD APARTMENTS	116	99	81	4	5	0	91	32	N/A	N/A
Project Based Section 8	BENNETT PLAZA	48	100	96	8	1	0	56	29	N/A	N/A
Project Based Section 8	ROYAL CREST	165	100	90	3	6	1	99	44	Education Corridor	N/A
Project Based Section 8	ST. JAMES MANOR APARTMENTS	149	99	94	7	6	1	98	50	Lancaster Corridor	N/A
Project Based Section 8	HIGH POINT SENIOR LIVING -A	11	100	82	100	5	0	91	32	N/A	N/A

Public Housing

The study geolocated a total of 16 developments using public housing data from the Picture of Subsidized Households database (2017). Twelve (75%) of these developments appear in predominantly nonwhite census tracts, and nine (56%) of these appear in the most segregated census tracts (at least 30% greater nonwhite share).

Four public housing projects (Frazier, Brackins Village, Cliff Manor, and Hamptons at Lakewest) are located within a R/ECAP census tract. The poverty rates of these neighborhoods vary from 49% to 59% while the poverty rates for the other public housing developments range from 29% to 39%. The nonwhite concentration of most census tracts with public housing developments exceeds 90%; the census tracts containing Renaissance Oaks (57%) and Cedar Springs Place both have much lower nonwhite concentrations.

.

Legend

Nonwhite/White Segregation

Segregation Categories

- Greater white population share
- Same as city proportions
- 0 to <10% greater nonwhite share
- 10 to <20% greater nonwhite share
- 20 to <30% greater nonwhite share
- 30 to <40% greater nonwhite share

Legend

- Public Housing

R/ECAP

- 1
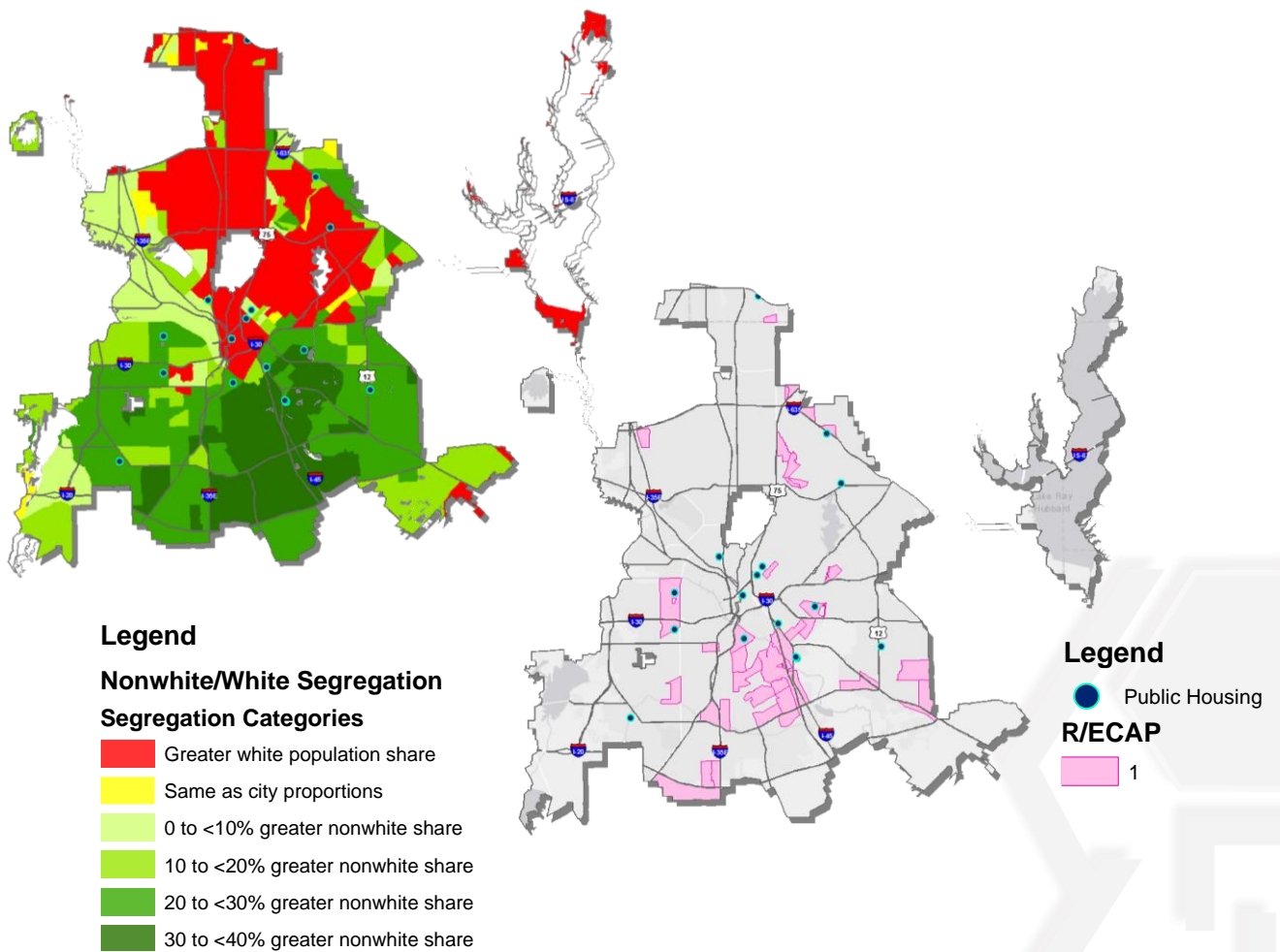
Figure 150: Public housing locations with respect to segregation and R/ECAPs

Low Income Housing Tax Credits

The study geolocated a total of 159 developments using Low Income Housing Tax Credit (LIHTC) data from HUD's Low-Income Housing Tax Credit Database. Twenty-nine (18%) of these developments appear in census tracts with a nonwhite population share at least 30% greater than the city average (darkest green shade), and 101 (64%) of the LIHTC developments appear in census tracts with a nonwhite population share at least 20% greater than the city average. Only twenty-four (15%) LIHTC developments appear in predominantly white census tracts (red shade). Furthermore, fifty-six (35%) of the LIHTC developments appear in R/ECAP census tracts. On average the census tracts containing a LITHC development have a poverty rate of 25%.

Legend

Nonwhite/White Segregation

Segregation Categories
- Greater white population share
- Same as city proportions
- 0 to <10% greater nonwhite share
- 10 to <20% greater nonwhite share
- 20 to <30% greater nonwhite share
- 30 to <40% greater nonwhite share

Legend
- Low Income Housing Tax Credit
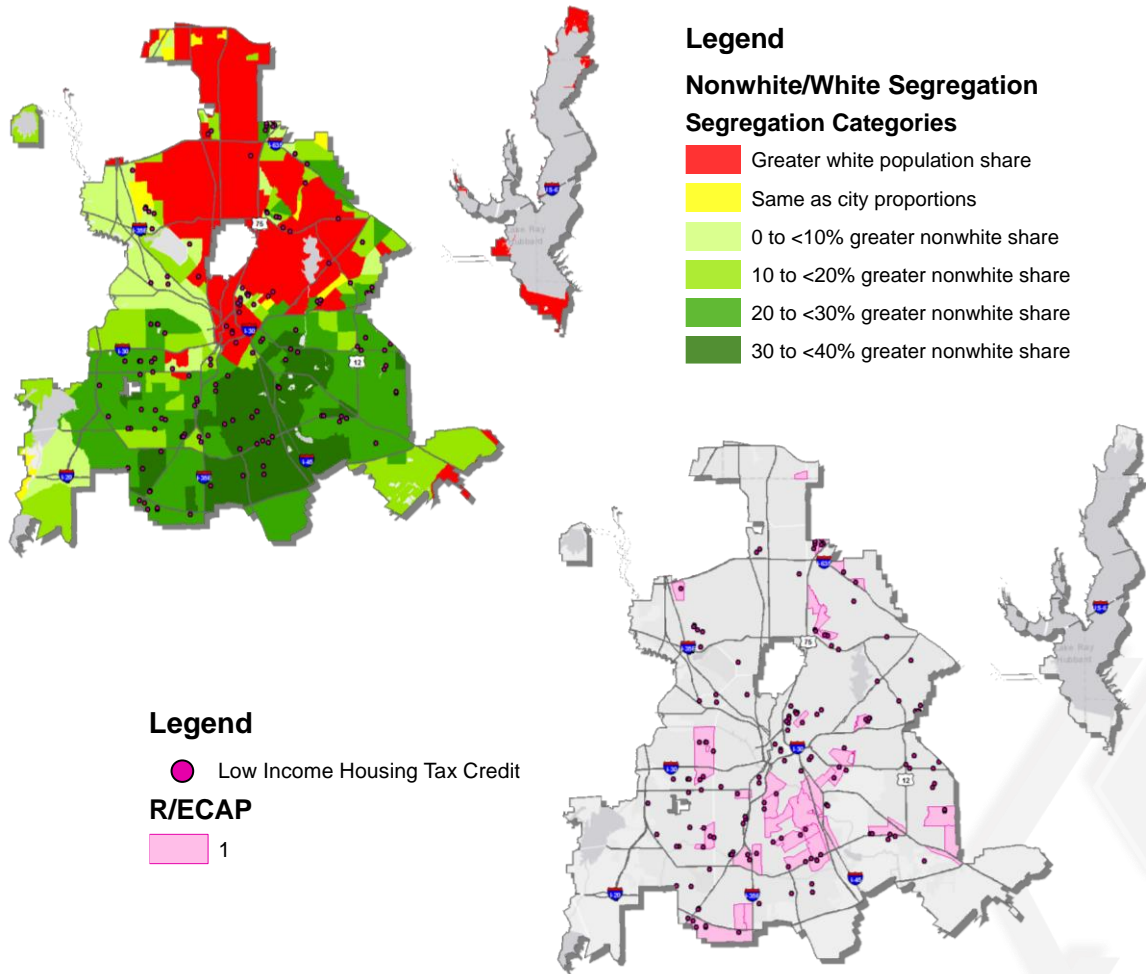
R/ECAP
- 1

Figure 151: Low Income Housing Tax Credit developments locations with respect to segregation and R/ECAPs

ii *Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.*

City of Dallas

Families with children are similarly proportioned in public housing and the HCV Program, while in project-based Section 8 housing, families with children are more than twice as frequent in R/ECAP tracts (69%) as in non-R/ECAP tracts (31%). Elderly persons are similarly proportioned in public housing, Other HUD Multifamily and HCV programs, while in project-based Section 8 housing, elderly persons are nearly a fifth as frequent in R/ECAP tracts (10%) as in non-R/ECAP tracts (46%).

Persons with disabilities are similarly proportioned in HCV programs, more frequently present in R/ECAP tracts for public housing than in non-R/ECAP tracts for public housing, and less frequently present in project-based Section 8 housing and Other HUD Multifamily housing R/ECAP tracts as compared to non-R/ECAP tracts for project-based Section 8 housing and Other HUD Multifamily housing. A visual comparison of the proportions present can be seen in the infographic.

Table 65: Racial/ethnic composition of publicly supported housing programs within and outside R/ECAPs, Dallas (source: HUD)

Dallas, TX	Total units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	1,376	3.15%	87.32%	9.46%	0.00%	44.53%	17.33%	34.66%
Non R/ECAP tracts	1,362	4.45%	86.13%	8.83%	0.59%	50.99%	14.53%	27.37%
Project-based Section 8								
R/ECAP tracts	947	6.13%	87.12%	5.11%	1.53%	68.64%	9.82%	6.77%
Non R/ECAP tracts	2,292	20.29%	58.00%	16.18%	5.35%	30.69%	46.05%	25.36%
Other HUD Multifamily								
R/ECAP tracts	117	1.74%	65.22%	19.13%	13.91%	0.00%	100.00%	4.24%
Non R/ECAP tracts	250	32.39%	38.06%	26.72%	2.43%	0.00%	89.62%	12.69%
HCV Program								
R/ECAP tracts	4,361	5.89%	88.71%	3.92%	1.47%	40.94%	28.74%	29.42%
Non R/ECAP tracts	9,379	5.49%	87.24%	5.22%	1.93%	44.02%	19.03%	25.49%

Regional Patterns

HUD did not provide a table for the region to compare regional patterns.
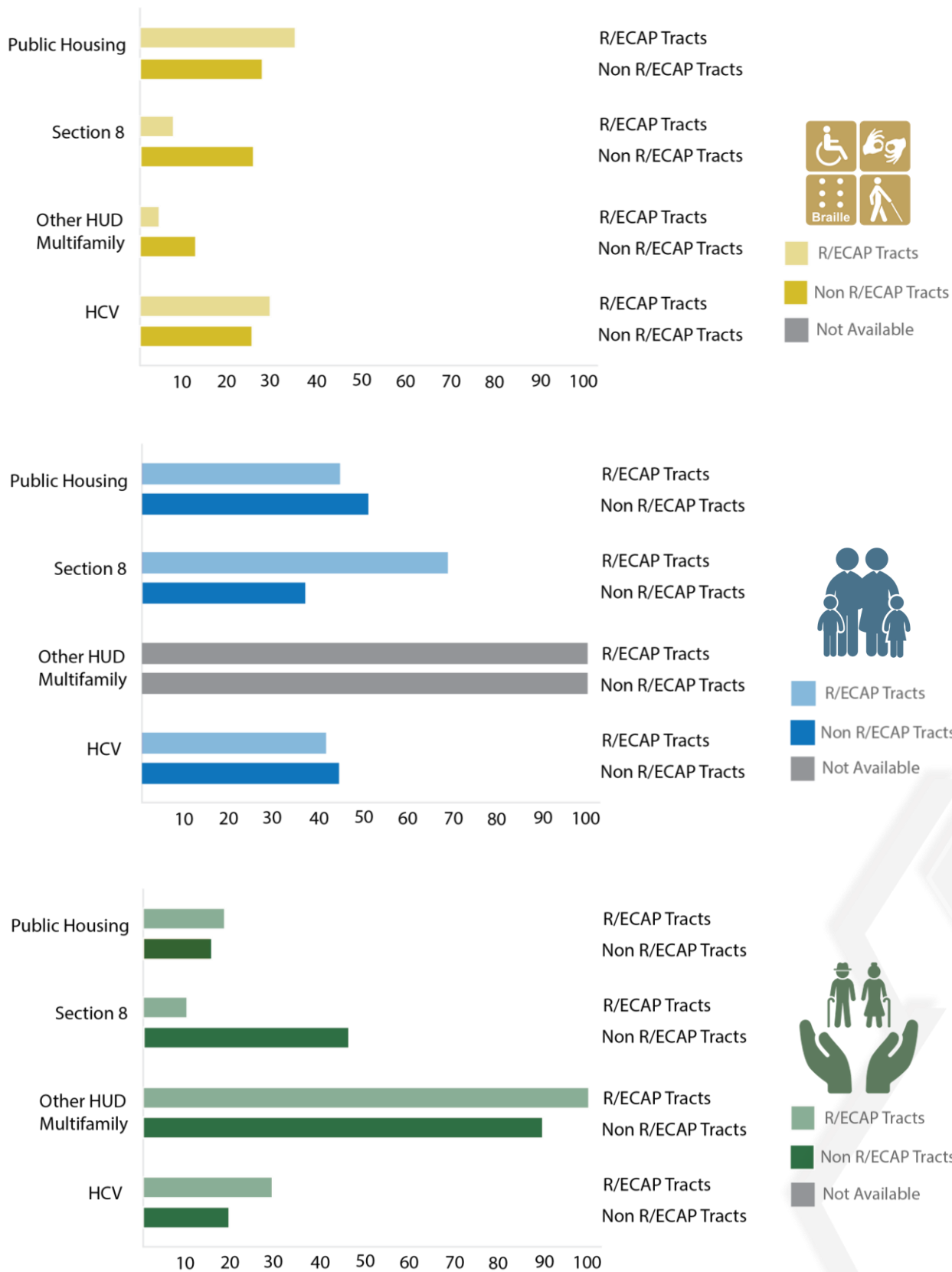
Figure 152: Percent of households with disability, families with children, and elderly individuals across publicly supported programs within and outside R/ECAPs (source: HUD)

City of Dallas

The demographic composition of publicly supported housing in R/ECAPs compared to non-R/ECAPs can be seen in the figure below. Residents of **public housing** and **HCV** units in R/ECAP tracts show comparable demographic proportions to those in non-R/ECAP ones. However, in **project-based Section 8** housing and other multifamily housing, black participants display a larger percentage in R/ECAPs than non-R/ECAPs. The percentage of occupied units in R/ECAPs for these two HUD programs substantially decreases for all other demographic groups except for Asian/Pacific Islanders in **other multifamily housing**. This group's percentage of multifamily occupied units is higher in R/ECAP than in non-R/ECAP tracts.

More **elderly** and **disabled households** living in public housing and HCV units reside in R/ECAPs than non-R/ECAPs; more families with children in these units are found in non-R/ECAP than in R/ECAP tracts. Also, according to HUD data, more seniors in other HUD multifamily units reside in R/ECAP neighborhoods, while their presence in Section 8 units is higher in non-R/ECAP ones. The percentage of disabled persons in Section 8 units is also higher in non-R/ECAP. It must be noted that with the exception of public housing (1,376 units), a larger number of occupied units in non-R/ECAPs as opposed to R/ECAPs can be observed for each HUD housing program.

Table 66: Demographic composition of publicly supported housing programs within and outside R/ECAPs, Dallas (source: HUD)

Dallas, TX	Total units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	1,376	3.15%	87.32%	9.46%	0.00%	44.53%	17.33%	34.66%
Non R/ECAP tracts	1,362	4.45%	86.13%	8.83%	0.59%	50.99%	14.53%	27.37%
Project-based Section 8								
R/ECAP tracts	947	6.13%	87.12%	5.11%	1.53%	68.64%	9.82%	6.77%
Non R/ECAP tracts	2,292	20.29%	58.00%	16.18%	5.35%	30.69%	46.05%	25.36%
Other HUD Multifamily								
R/ECAP tracts	117	1.74%	65.22%	19.13%	13.91%	0.00%	100.00%	4.24%
Non R/ECAP tracts	250	32.39%	38.06%	26.72%	2.43%	0.00%	89.62%	12.69%
HCV Program								
R/ECAP tracts	4,361	5.89%	88.71%	3.92%	1.47%	40.94%	28.74%	29.42%
Non R/ECAP tracts	9,379	5.49%	87.24%	5.22%	1.93%	44.02%	19.03%	25.49%

Figure 153: Racial/ethnic composition of publicly supported housing programs, Dallas

Regional Patterns

The following information, also retrieved from HUD table 7 for each jurisdiction or area containing R/ECAPs, combines local data on the HCV program collected from participating jurisdictions.
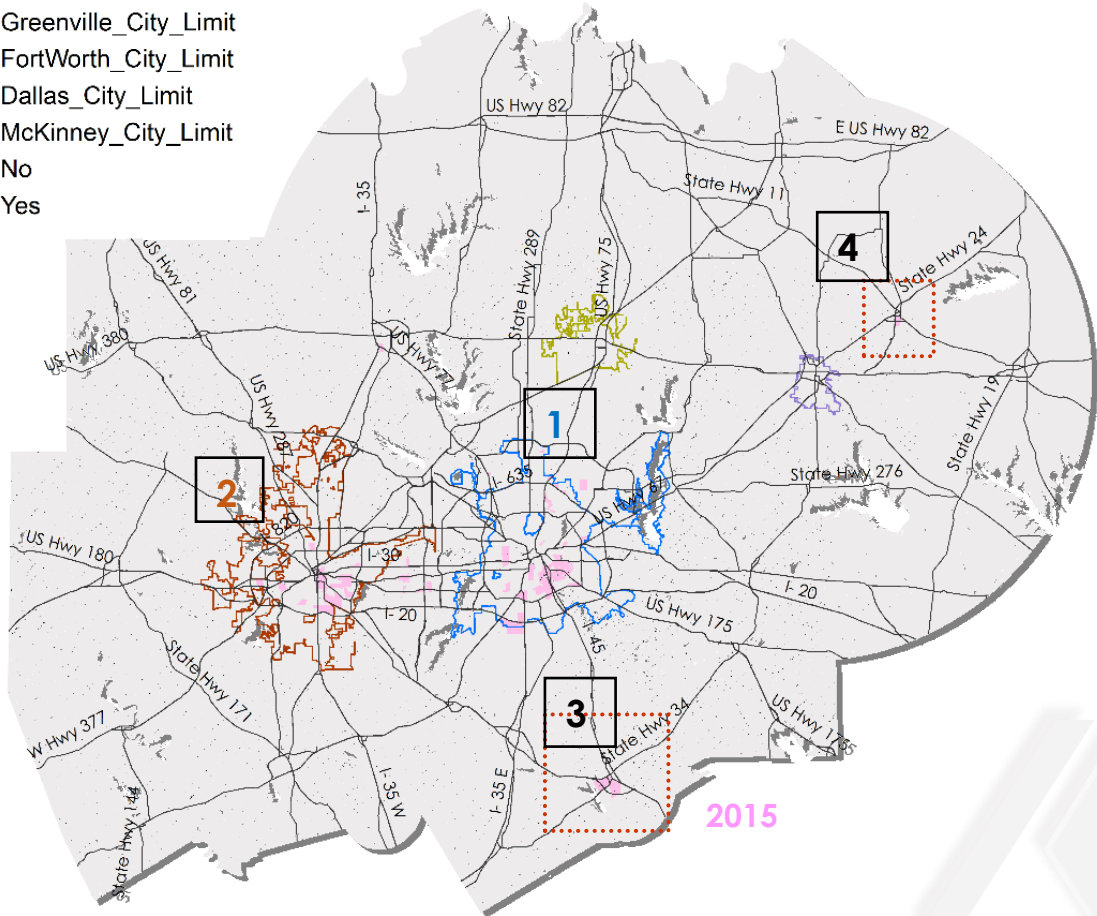
Figure 154: R/ECAP patterns, North Texas region

Area 1: Dallas County

Comparable proportions of **Public Housing** units are located in R/ECAP (50.3%) and non-R/ECAP census tracts (49.7%). Units in both R/ECAP and non-R/ECAP tracts show comparable demographic compositions in terms of race and ethnicity. However, units in R/ECAP tracts tend to be occupied by a slightly higher percentage of both elderly individuals and persons with disabilities.

A substantially higher proportion (71%) of **project-based Section 8** units are located in non-R/ECAP tracts as opposed to R/ECAP census tracts (29%). Units in R/ECAP tracts tend to be occupied by a considerably higher proportion of black households (87%) as well as by families with children (69%). Conversely, project-based Section 8 units in non-R/ECAP tracts, compared

to R/ECAP tracts, tend to have a higher proportion of white households (20%), elderly individuals (46%) and persons with disabilities (25%).

With respect to **other multifamily housing**, a greater proportion of units (68%) are located in non-R/ECAP tracts. However, black households tend to reside in other multifamily housing located in R/ECAP tracts (65%) as opposed to non-R/ECAP tracts. This is also the case for Asian or Pacific Islander households and for elderly households.

The figure above shows that a higher proportion (68%) of **HCV** families reside in non-R/ECAP areas. The table further shows that the race/ethnic composition of R/ECAP tracts is comparable to non-R/ECAP tracts. Similar to the public housing program, a higher proportion of families with children and persons with disability live in non-R/ECAP tracts.

As presented in the preceding sections, **local data** has been gathered to supplement the HUD-provided data. A sample of 28,194 **HCV** families served by the participating jurisdictions in the North Texas Regional Housing Assessment has been assembled. A total of 27,743 HCV families have been successfully geolocated, enabling a finer spatial analysis of residential patterns. A total of 10,470 HCV families reside in Dallas and 17,222 HCV families in Dallas County. About 34% of HCV families residing in the City live in R/ECAP census tracts and about 26% of HCV families residing in Dallas County live in R/ECAP census tracts.

An estimated 4,642 heads of household with a disability reside in the City of Dallas and about 36% of these HCV families reside in R/ECAP census tracts. An estimated 1,735 heads of household are elderly (65 and over) and about 31% of these HCV families live in R/ECAP areas.

In Dallas County, non-R/ECAP census tracts have an average concentration of 28 HCV families, while R/ECAP census tracts have an average of 100 HCV families. This indicates a disproportionate spatial concentration of HCV families in R/ECAP areas.

Area 2: City of Fort Worth

A substantially higher proportion of **public housing** units in Fort Worth are located in R/ECAP tracts (73%) as opposed to non-R/ECAP tracts (27%). The concentration of black households and families with children is also higher in R/ECAP tracts. Conversely, the concentration of white and Asian or Pacific Islander households is higher in non-R/ECAP tracts. In addition, the proportion of elderly individuals and persons with disabilities is also higher in non-R/ECAP than R/ECAP tracts.

The figure above shows that more **project-based Section 8** units are located in non-R/ECAP tracts (55%) than in R/ECAP tracts (45%). Similarly, more **HCV** families reside in non-R/ECAP tracts (85%). For both housing programs, the proportion of black households is higher in R/ECAP tracts; correspondingly, the proportions of white and Hispanic households are higher in non-R/ECAP tracts. The proportion of families with children is higher in R/ECAP tracts for the project-based Section 8 program, while it is higher in non-R/ECAP tracts for the HCV program. The concentration of **elderly program participants** is lower in R/ECAP tracts for Section 8 while higher in R/ECAP tracts for the HCV programs. As for the concentration of **persons with disabilities**, the numbers are comparable across R/ECAP and non-R/ECAP tracts for both the HCV and project-based Section 8 programs.

Analysis of **local data assembled on the HCV program** shows that an estimated 5,055 HCV families reside in the City of Fort Worth and 5,562 families in Tarrant County (excluding Arlington). An estimated 33% of HCV families residing in Fort Worth live in R/ECAP census tracts. There are 2,246 HCV families with a head of household with a disability living in the City of Fort Worth and about 35% of these families live in R/ECAP census tracts. An estimated 789 families

have an elderly head of household and 38% of elderly-led HCV families reside in R/ECAP areas. In Tarrant County, non-R/ECAP census tracts include an average of 14 HCV families per census tract, while R/ECAP census tracts have an average of 39 HCV families. In other words, R/ECAP census tracts in Tarrant County tend to include twice as many HCV families as a non-R/ECAP neighborhood.

Areas 3 and 4: Commerce and Ennis

HUD Table 7, "R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category," is unavailable for these areas. Relying on local knowledge and local data, an estimated 517 HCV families reside in Greenville (containing a R/ECAP in 2013); 45% of these families have a head of household with a disability and 27% have an elderly head of household. There is one R/ECAP in Hunt County, which includes 37 HCV families; non-R/ECAP areas have an average of 36 HCV families. An estimated 24 HCV families live in the City of Ennis. Five out of the seven families with a head of household with a disability live in a R/ECAP area. There is one R/ECAP area in Ellis County, including 17 HCV families. Non-R/ECAP areas have an average of two HCV families.

| iv. A | *Do any developments of public housing, properties converted under the RAD and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.* |

The comparative racial/ethnic demographic portraits (Figure 155) of each program at the jurisdictional level rely primarily on HUD-provided data. More specifically, local information was collected from the jurisdictions participating in the North Texas Regional Housing Assessment to address a regional demographic profile of the Housing Choice Voucher program.

In Dallas, the HCV and Public Housing programs are largely composed of black households (respectively 88% and 87%). While representing a lesser share, black households remain the dominant group in project-based Section 8 (67%) and other multifamily programs (47%). Hispanic households make up the second largest group in other multifamily programs (24%) and the third largest group (13%) in the Section 8 programs, after white households (16%). Asian/Pacific Islander households are participating at a greater rate in the Other Multifamily programs compared to the HCV or public housing programs.

Families with children represent a greater share of residents in public housing (49%), followed by the voucher programs, where 43% of participating households are families with children.
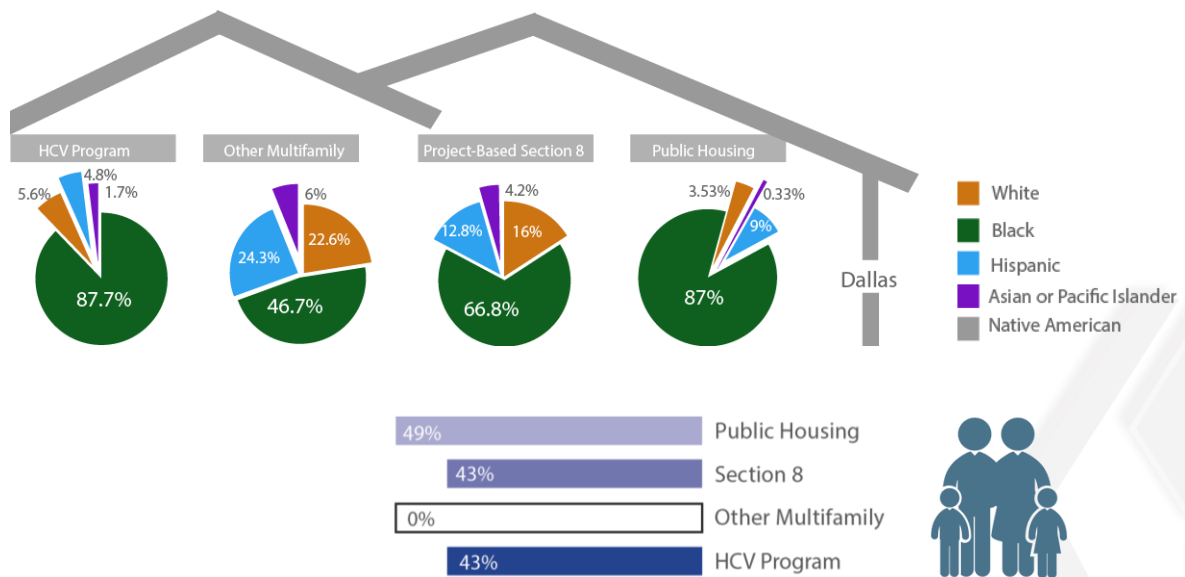
Figure 155: Racial/ethnic composition and share of families with children by publicly supported housing programs, Dallas

Using local data in the table below, all public housing developments appear to have predominantly black residents, which agrees with the HUD data previously presented, and an indefinite mix of percentages exist for households with children. All Section 8 developments have predominantly black residents, except for three developments that have predominantly white residents and one development that has predominantly Hispanic residents, in agreement with the HUD data previously presented. Six of the studied Other Multifamily Assisted Housing developments have predominantly black residents, four have predominantly white residents, and two have predominantly Hispanic residents, also in general agreement with the HUD data.

Table 67: Demographic composition of publicly supported housing by properties

Development Name	# Low-income Units	White	Black	Hispanic	Asian	Households with Children
Public Housing						
Hamptons At Lakewest	775	1%	86%	12%	0%	61%
Audelia Manor	122	13%	82%	5%	N/a	1%
Cliff Manor	178	12%	79%	9%	N/a	2%
Cedar Springs Place	180	6%	83%	8%	2%	44%
Wahoo Frazier	248	1%	94%	4%	0%	60%
Hidden Ridge	226	4%	89%	5%	1%	29%
Park Manor	196	7%	86%	7%	N/a	N/a
Frankford Townhomes	135	5%	81%	12%	2%	69%
Barbara Jordan Square	120	1%	83%	16%	N/a	98%
Roseland Townhomes, Phase I	417	1%	90%	9%	0%	64%
Renaissance Oaks_Scattered Sites Ii	91	14%	77%	9%	N/a	7%
Scattered Sites	125	4%	83%	12%	1%	80%
Project-Based Section 8						
Mirasol Fka Lake June	100	7%	86%	7%	1%	81%
Parks At Wynnewood Apartments	116	1%	96%	3%	N/a	86%
Pleasant Village Apartments Aka Cre	130	2%	97%	2%	N/a	77%
Friendship Towers I	150	29%	53%	17%	N/a	N/a
Prairie Creek Village Apartments	118	16%	64%	20%	N/a	N/a
Royal Crest	165	0%	98%	2%	N/a	82%
St. James Manor Apartments	100	2%	96%	2%	N/a	72%
Cathedral Gardens	23	83%	13%	0%	N/a	N/a
Forest Green Manor	251	19%	72%	8%	2%	1%
Greater Bethlehem Plaza	30	17%	79%	3%	N/a	N/a
Echad Apartments I	231	50%	8%	9%	33%	N/a
Lakeland Manor	171	10%	82%	6%	1%	1%
Shiloh Village Apartments	167	7%	72%	11%	9%	84%
Estelle Village	288	1%	92%	7%	N/a	69%
Ridgecrest Terrace Apartments	246	2%	74%	22%	1%	77%
Pythian Manor	75	1%	99%	0%	N/a	N/a
Colonia Tepeyac	280	3%	64%	30%	2%	77%
Fowler Christian	144	81%	10%	8%	1%	1%
Dickinson Place	116	35%	39%	23%	2%	N/a
Cherokee Village	61	31%	69%	0%	N/a	48%
High Point Senior Living -A	11	0%	100%	0%	N/a	N/a
Casa Trevino	85	11%	13%	74%	2%	N/a
Northgate Village	167	28%	47%	0%	25%	76%
Peoples El Shaddai Village	100	1%	95%	3%	N/a	77%
Trinity Apartments	143	N/a	N/a	N/a	N/a	N/a
Bennett Plaza	48	20%	13%	65%	N/a	N/a
Other Multifamily Assisted Housing						
Caldwell House	6	N/a	N/a	N/a	N/a	N/a
Cliff View Village	28	11%	89%	0%	N/a	N/a
Fowler Christian Apts Iii	36	77%	6%	11%	6%	N/a
Mabel Meshack White Manor	65	2%	35%	37%	26%	N/a
Fowler Christian Apartments Ii	20	76%	5%	14%	5%	N/a
Cliff View Village Iii	27	8%	92%	0%	N/a	N/a
Umphress Terrace	53	18%	47%	27%	6%	N/a
Notre Dame Court	68	10%	19%	71%	N/a	N/a
Cliff View Village Ii	27	4%	96%	0%	N/a	N/a
Cherbonay At Marsalis Ind. Liv	11	18%	82%	0%	N/a	9%
Iris Place	18	100%	N/a	0%	N/a	N/a
Aya Village	29	0%	100%	0%	N/a	N/a

v. *Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

In Dallas, the HCV and public housing programs are largely composed of black households (respectively 88% and 87%). While representing a lesser share, black households remain the dominant group in Section 8 (67%) and other multifamily programs (47%). Hispanic households make up the second largest group in other multifamily programs (24%) and the third largest group (13%) in the project-based section 8 programs, after white households (16%). Asian or Pacific Islander households are participating at a greater rate in the other multifamily program, as opposed to the HCV or public housing programs.
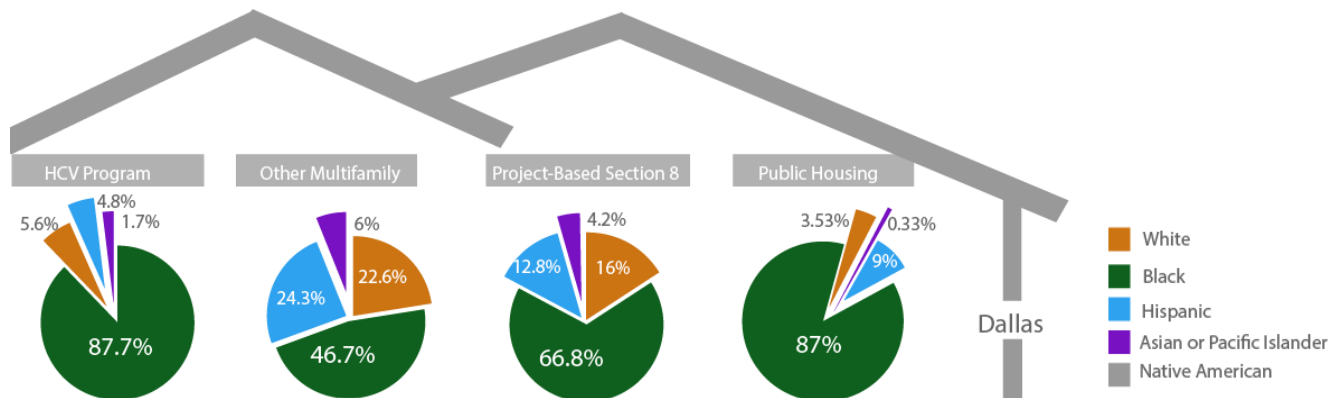
Figure 156: Racial/ethnic composition of publicly supported housing programs, Dallas (source: HUD)

The following table shows, for each housing program, the average share by race and ethnicity and median income of the census tract in which developments and families are located. The information was computed for each program by geolocating developments and families, extracting locational information and then deriving averages at the census tract level.

Table 68: Average racial/ethnic composition and median income of census tract by publicly supported housing programs

Averages by race and ethnicity, median income of census tract in which developments/families are located						
	HCV Program	LITHC	Section 202	Section 811	Project-Based Section 8	Public Housing
White	12%	17%	14%	11%	13%	24%
Black	45%	34%	56%	17%	38%	33%
Hispanic	39%	45%	28%	66%	49%	98%
Asian or PI	2.2%	2.3%	1.2%	4.3%	1.9%	4.3%
Native American	0.1%	0.1%	0.1%	0%	0.1%	0.05%
Median Income	$40,155	$30,932	$35,918	$31,823	$31,958	$33,689
Total	10,531	159	9	3	25	16

The average neighborhood racial and ethnic composition for each program does not perfectly reflect (in proportion) the composition of each program, although developments and families tend to be located in mostly nonwhite neighborhoods (proportion greater than City average).

v. *Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

Similar to the analysis conducted in the preceding question, each program's developments and families were geolocated to extract locational information (index score) and then derive averages for each index at the census tract and block group level.

Table 69: Average opportunity index score by publicly supported housing programs

Average opportunity index score						
Index	HCV Program	LITHC	Section 202	Section 811	Project-Based Section 8	Public Housing
Low Poverty	16	13	16	13	14	21
Environmental Health Hazard	28	27	26	26	28	31
Labor Market Engagement	28	31	24	30	31	39
Job Index	44	54	51	67	44	59
School Index	29	29	36	34	23	39
Transportation Cost	73	77	68	83	71	77
Transit	56	58	53	60	54	56

Overall, programs tend to register comparable scores across indices. Developments and HCV families tend to be located in areas of relatively high poverty exposure (low poverty index scores). On the other hand, the transportation indices suggest that developments tend to be transportation-affordable and transit-accessible areas[14]. Section 202 and 811 developments scored higher than other HUD programs on the school index, which indicates a greater access to proficient schools. Distinctively, Section 811 developments outperform other programs with respect to access to transportation, jobs and schools.

---

[14] Refer to appendix for description and limitation of indices

a. *Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD provided data.*

Preferences

The Dallas Housing Authority uses preferences to establish the order of applicants on its waiting list, which is vital to the provision of publicly supported housing inside the City. Every applicant must still meet selection criteria before being offered an apartment. As listed in DHA's 2018 Public Housing Authority Plan, preferences will be granted to applicants who are otherwise qualified and who, at the time of the offer, are verified to meet one of the definitions of the preferences described below (Dallas Housing Authority, 2017).

There are five local preferences in effect. An applicant will qualify for a preference if he/she qualifies in one or more category:

a. *Vulnerable homeless persons*

1) A preference shall be granted to vulnerable homeless individuals and families as identified by the Bridge (individuals), the Salvation Army, Family Gateway, Family Place (families with children) and other organizations that serve homeless individuals and families when supportive services are available under a memorandum of agreement or through DHA social service staff. Additionally, persons with disabilities from other DHA properties who can remain as residents with the benefit of supportive services will be given a preference to transfer to such property.

2) Units at Renaissance Oaks, Park Manor, Audelia Manor, Forest Green Manor and Lakeland Manor and subsequently developed mixed population properties shall be offered to vulnerable homeless persons/couples.

3) In addition, turnover units at family properties shall be made available to homeless and formerly homeless families, with the exception of scattered site homes.

b. *Disaster preference*

Applicants displaced by a federally declared disaster or a disaster to a DHA-assisted unit will qualify for this preference if they apply within 90 days from the date the disaster is declared (and the waiting list is open at that time). They will be admitted in the following order:

1) Existing public housing residents and HCV program participants

2) Applicants who were not previously living in assisted housing but who meet all other application criteria

c. *Working families*

Applies to up to one-half of any year's admissions at non-elderly developments only. (Families whose sole adult members are elderly individuals or persons with disabilities at these properties will automatically be awarded this preference.) A family will qualify for this preference if they have at least one adult member who has been employed at least 30 hours per week in the six consecutive months prior to admission with no period of unemployment for more than two weeks. 1) At Fairmount Crossing, working families will receive a preference for the two- and three-bedroom units. 2) If there are insufficient working families to fill up to one-half of the year's admissions, units will not be held vacant – non-preference waiting list families will be admitted.

d. *Elderly or disabled persons of families in general occupancy properties*

For the one-bedroom units at Fairmount Crossing, applications from single persons who qualify under the definitions of elderly family and disabled family will be ranked higher than those of single persons who are not elderly, disabled or displaced.

e. *Mixed population building preference*

In buildings designed for occupancy by elderly and disabled families (Renaissance Oaks, Park Manor, Cliff Manor, Audelia Manor, Forest Green Manor and Lakeland Manor), applications from single persons who qualify under the definitions of elderly family, disabled family and displaced person will be ranked higher than those of single persons who are not elderly, disabled or displaced. None of these properties has been formally designated for elderly and disabled families. 1) Roseland Gardens, Buckeye Senior Building and Lakewest Senior Village properties are designated for occupancy by elderly families. Only families whose head, spouse or sole member is a person 55 years old or older may be admitted to these properties. No families with children may be admitted.

LIHTC programs

The availability of Low Income Housing Tax Credit units falls short of the need for housing for low-income residents in Dallas and throughout the region. Table 70 compares the availability of LIHTC units with the number of low-income households across major cities participating in the North Texas Regional Housing Assessment. Over twenty thousand units, or 3.7%, of housing units located in the City of Dallas in 2017 are LIHTC units (Texas Department of Housing and Community Affairs, 2017; North Central Texas Council of Governments, 2018). This rate is above the region-wide rate of 2.4%. Looking further at the available data, about 27% of Dallas households had incomes below $25,000 per year in 2016 (U.S. Census Bureau, 2016). These households have annual incomes below 50% of area median income and would qualify for LIHTC and other publicly supported housing but may not have sufficient income to afford LIHTC rents.

Table 70: LIHTC units in NTRHA cities as a percent of total housing units compared with low-income households

NTRHA Cities	# of LIHTC Units TDHCA 2017	# of Housing Units NCTCOG 2017	LIHTC Units as % of Total Housing Units (2017)	% Total Households < $25k annual income (2016 ACS)	Median Household Income (ACS 2016)	$25k as % of Median Household Income (2016 ACS)
Ennis	508	6,695	7.6%	29%	$ 43,774	57%
Cleburne	703	11,302	6.2%	25%	$ 49,573	50%
Fort Worth	13,698	314,761	4.4%	22%	$ 54,876	46%
Waxahachie	563	13,374	4.2%	19%	$ 55,385	45%
Denton	2,156	52,044	4.1%	26%	$ 50,487	50%
Grandview	24	604	4.0%	28%	$ 44,193	57%
Greenville	428	10,971	3.9%	32%	$ 37,304	67%
Dallas	20,116	542,928	3.7%	27%	$ 42,215	55%
McKinney	2,262	61,220	3.7%	11%	$ 83,257	30%
Ferris	16	864	1.9%	24%	$ 50,150	50%
Garland	1,287	82,787	1.6%	19%	$ 53,220	47%
Irving	1,322	96,160	1.4%	19%	$ 54,868	47%
Plano	1,174	109,813	1.1%	11%	$ 85,085	29%
Frisco	404	58,150	0.7%	6%	$ 117,642	21%
Region/MSA	64,775	2,650,896	2.4%	18%	$ 61,330	41%

LIHTC property rents primarily target households with incomes at 50%-60% of area median income such that housing expense does not exceed 30% of annual income (Texas Department of Housing and Community Affairs, 2018). The LIHTC supply fails to meet the need for housing for households at 30% area median income across the nation (Kitchens, 2017). Figure 159 displays the affordable rents offered by LIHTC projects in the Fort Worth-Arlington metropolitan area for different income levels (60% AMI, 50% AMI, 30% AMI) (Novogradac & Company LLP, 2018). Rents at properties providing housing for persons at 60% AMI would not be affordable to 30% AMI households without additional subsidies such as HCVs.

Bedrooms (People)	Charts	60.00%	50.00%	40.00%	30.00%	FMR
Efficiency (1.0)		811	676	541	405	730
1 Bedroom (1.5)		869	724	579	434	878
2 Bedrooms (3.0)		1,042	868	695	521	1,077
3 Bedrooms (4.5)		1,204	1,003	803	602	1,447
4 Bedrooms (6.0)		1,344	1,120	896	672	1,856
5 Bedrooms (7.5)		1,483	1,236	989	741	

LIHTC Rent Limits for 2018 (Based on 2018 MTSP/VLI Income Limits)

Figure 157: LIHTC-authorized rents for the Dallas HUD Metro FMR Area, 2018

Figure 158 displays the location of Dallas LIHTC properties as of July 2017 (Novogradac & Company LLP, 2017). The largest number of tax credit properties is located in south Dallas, although there are properties throughout the City. TDHCA lists 138 projects with 20,116 units in Dallas approved from 1990 to 2017. About 14% of these properties target elderly residents.
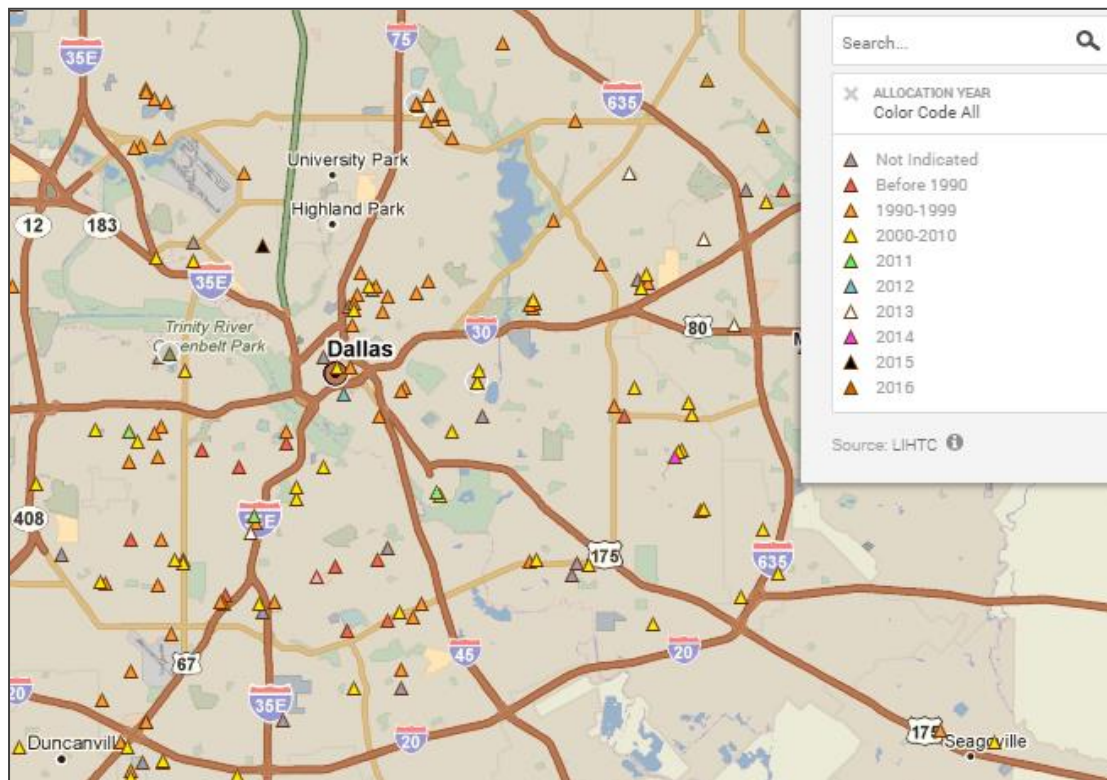
Figure 158: LIHTC properties in Dallas as of July 2017 by allocation year (Novogradac 2017)

The amount of publicly supported housing is far below the number of households that would qualify for assistance. Approximately 8% of the housing units in Dallas are supported by some form of housing assistance, including public housing, vouchers and LIHTC units (Texas Department of Housing and Community Affairs, 2017; U.S. Department of Housing and Urban Development, 2017). Households with incomes less than $25,000 per year would require an affordable rent (including utilities) of approximately $600 per month or less at 30% of income. Average rents now exceed $900 per month (MPF Research, 2017). Twenty-seven percent of households in the City of Dallas had incomes below $25,000 in 2016 (U.S. Census Bureau, 2016).

Table 71: Comparison of available units of publicly supported housing with low-income households (TDHCA 2017, HUD 2017, ACS 2016)

Dallas	
Total Housing Units	542,928
Low-income housing supply	
LIHTC Units	20,116
Public Housing Authority Units	22,916
Subtotal	**43,032**
Subtotal: As a % of total housing units	**7.9%**
Households w/income < $25k	**27%**

Mobility Programs

In the Dallas metropolitan area, patterns of segregation set the stage for litigation in Walker v HUD beginning in 1985 (Daniel & Beshara, P.C., 2018). The initial lawsuit was against the city of Mesquite, a suburb of the city of Dallas, where the plaintiff was prevented from using a Section 8 voucher. The Walker decision found that "certain housing programs prevented minorities from moving into non-minority areas of Dallas" and the surrounding suburbs (Dallas Housing Authority, 2012). The court ordered (among other remedies) that programs be established to facilitate the use of rental subsidy vouchers in predominantly white, lower poverty communities (Debra Walker, et al., v. U.S. Department of Housing and Urban Development, et al., 2001).

The Mobility Assistance Program, operated by Inclusive Communities Project (ICP), resulted from the Walker Settlement and serves residents participating in the Dallas Housing Authority's Housing Choice Voucher Program. Families are assisted in using vouchers to obtain housing in higher opportunity areas in seven counties.

The Dallas Housing Authority (DHA) was provided funds for mobility counseling in the form of moving expenses—now exhausted. However, in 2017 DHA expended over 1 million dollars on mobility counseling, landlord bonuses, application fees, security deposits, moving expenses and utility deposits. To reverse patterns of segregation, Walker Settlement Voucher holders (currently 579 families) must move to housing in a Walker Targeted Area (HOAs) defined as a census tract in which the poverty rate is less than or equal to 22.3%, the black population is less than or equal to 25.7% and where no public housing is located (Inclusive Communities Project, 2013). ICP further assists DHA voucher holders to relocate in High Opportunity Areas, defined as census tracts in which residents have incomes at or above 80% of the area median income, no more than 10% of residents have incomes below the federal poverty rate and public schools meet the standards of the Texas Education Agency and have 4-year graduation rates of 85% or higher.

Figure 159: High-opportunity areas and Walker targeted areas (source: ICP)

Family Self-Sufficiency (FSS) Program

The Dallas Housing Authority Family Self-Sufficiency (FSS) Program is a voluntary program designed to assist families in becoming economically independent and self-sufficient within five years. All Dallas Housing Authority Housing Choice Voucher and public housing residents are eligible to participate in FSS. From the FSS materials:

Program Discovery

- There is NO COST to participate - receive services of case management, resource assistance, problem solving and referral services which include GED classes, training and job search assistance.

- Remain a member of the Family Self-Sufficiency (FSS) for up to five years working toward your goals. While in the Family Self-Sufficiency (FSS) Program, you must be active; either in school or working at least 30 hours per week. You have five (5) years to reach your goals.

- Receive extensive case management; meet with your assigned case manager and complete a family assessment. It is the responsibility of the program participant to stay in contact with the Case Manager by phone, email, office visits or sending in progress reports.

- Enter into an agreement with the Dallas Housing Authority Family Self-Sufficiency Program. This agreement is called a Contract of Participation. This agreement explains Dallas Housing Authority's responsibility to you and it also explains your responsibility as a participant in the Family Self-Sufficiency Program.

- Develop a "Service Plan"; which is your plan of action to reach your goals. This "service plan" will have written steps of what you will do to become self-sufficient. The Case Manager will be available to you as you work to complete the goals and help with problem solving.

Program Completion Requirements:

- Must be employed

- Household must be free of TANF (cash benefits only) for 12 consecutive months prior to completion

- Complete goals outlined in Individual Service Training Plan

Program Incentive:

- The program incentive or reward for successful growth and completion of the Family Self-Sufficiency Program is the ESCROW account. Reach your goals and discontinue receipt of any welfare assistance and you are eligible for your escrow funds (if applicable).

- During your participation in the Family Self-Sufficiency program, if you have achieved interim goals (after one year of enrollment) and need assistance with attaining goals related to education, training and starting own business; you may request an ESCROW advancement

- The ESCROW Advancements are determined based on those items that directly impact the Family's ability to get to and from work. Can only receive advance once within a twelve (12) month timeframe.

GrowSouth

The GrowSouth (GS) initiative is another major place-based investment strategy led by the City of Dallas since 2012 to bring economic development to the City's southern half. The economic development strategy identified eight focus areas that are divided into three categories as displayed in the map and table below.
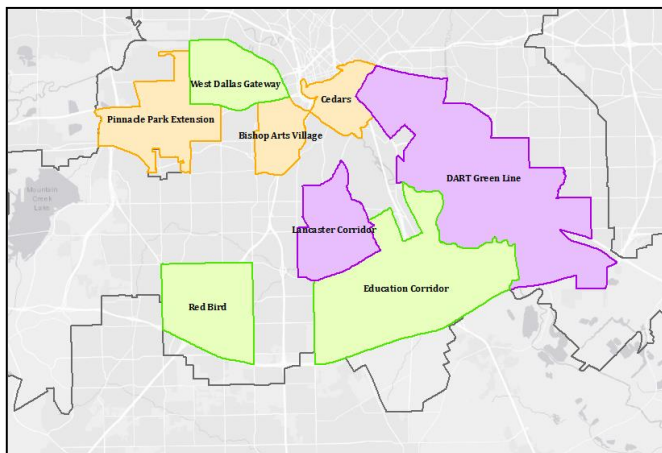
Figure 160: GrowSouth focus area

GrowSouth Focus Areas		
Category 1	**Category 2**	**Category 3**
Pinnacle Park Expansion	Education Corridor	Lancaster Corridor
North Oak Cliff (Bishop Arts Village)	Red Bird	Dart Green Line
Greater Downtown/ Cedars	West Dallas Gateway	

Neighborhood Plus Plan

In 2015, Dallas adopted a Neighborhood Revitalization Plan that focuses on alleviating poverty, fighting blight and enhancing rental options, among other things. The plan identifies 12 Neighborhood Plan (NP) focus areas:

- Elm Thicket-Northpark
- Red Bird
- Kiest Cliff
- The Bottom
- Pemberton Hill
- Arcadia Park

- Skyline
- Bonnie View
- Casa View
- Family Corridor
- Coit/Spring Valley
- Vickery Meadow

The segregation and R/ECAPs sections offer an overview and evaluation of the GrowSouth initiative and Neighborhood Plus Plan.
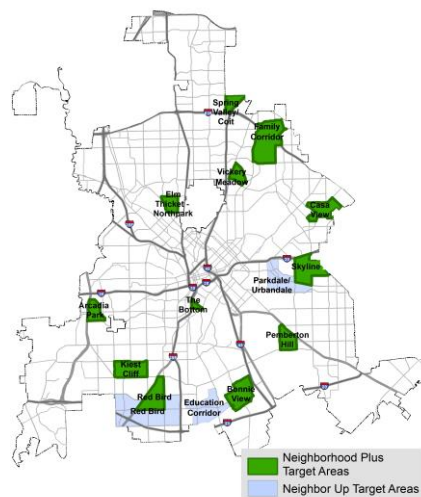
Figure 161: Neighborhood Plan focus areas areas (source: city of Dallas website)

<u>Housing Policy and Place-based investments:</u>

Based on the results of the Market Value Analysis, the newly adopted housing policy proposes a geographic prioritization among 3 reinvestment areas: Redevelopment Areas; Stabilization Areas; and Emerging Markets Areas.

> **Redevelopment Areas (4)**
> Catalytic project scheduled to occur within the next 12 months that is supported by a third-party, independent market analysis. Project must include new housing production with affordable units offered for sale or rent to a mix of income bands.
> **Stabilization Areas (8)**
> Weaker real estate markets (G,H,I) surrounded by stronger markets (A-E) and, as such, are at risk of displacement based on market conditions and scheduled redevelopment projects.
> **Emerging Market Areas (3)**
> A blend of middle markets (C,D,E) with mostly G,H,I markets. Needs intensive environmental enhancements, public infrastructure assessments and corrective plans, code enforcement, master planning and formalized neighborhood organizations to be prepared for real estate investment.

<u>Voucher sublease program</u>

The City also proposes that a sublease agreement arrangement be structured with an incentive to a landlord/developer to facilitate the rental of units to voucher holders. This would be done through the Dallas Housing Finance Corporation (DHFC).

2. Contributing Factors of Publicly Supported Housing Location and Occupancy

During the first round of public meetings and focus groups, participants were asked to identify contributing factors to the seven fair housing issues at the heart of the AFH tool. Specifically, participants were asked to identify factors contributing to fair housing issues such as segregation, R/ECAPs, disproportionate housing needs and disparities as they relate to publicly supported housing.

The most cited set of contributing factors to these fair housing as it relates to publicly supported housing included **siting selection policies and decisions**, discretionary aspects of qualified allocation plans (QAP) and other programs, and other **practices and decisions** for publicly supported housing. The continuous concentration of publicly supported housing in the same areas was a dominant concern voiced by residents. Commenters noted that while some investments are going into high-poverty areas, they remain inadequate. Participants notably expressed their concerns regarding the lack of deep income targeting under the current TIF program. A respondent explained "there are ongoing issues on how TIF is handling affordable housing. First of all, there's no accountability, if you're talking about 80% *[AMI]*, you will not cover all families". Public participants advocated not only for changes in local policies, but also at the county and state levels. Another prevalent concern voiced by residents was the too-short time window granted to voucher holders to secure housing while facing source of income discrimination.

The second most cited set of contributed factors included the lack of access to opportunity due to high housing costs, the **loss of affordable housing** and **displacement** due to economic pressures. A resident explained: "we can't talk about affordable housing while in Dallas, it simply does not exist". Several residents expressed their concerns about the lack of housing options for low-income families and people on fixed income such as individuals with disabilities.

Another dominant contributing factor to fair housing issues related to publicly supported housing was the lack of quality affordable **housing information programs**. Commenters suggested that the lack of easy access to information greatly contributed to families not taking full advantage of their rights, while it also fuels the fear of some individuals about applying for assistance. A resident explained that "they need to provide a lot of information, but they are afraid to expose themselves".

Residents identified the **lack of public and private investments** and lack of **law enforcement** as contributing to fair housing issues. They notably mentioned the lack of city-funded programs to help the communities. They further explained that, because the area is not attractive and the risk of crime is high, it deters private investments and families to move in. Residents are concerned about the perception of their neighborhood, with respect to crime but also the presence of dilapidated housing and vacant lots. Public meeting participants also stated greater law enforcement and police coverage would effectively deter crime and contribute to overall community safety.

Sample AFH public engagement

Answering "What are the contributing factors to fair housing issues as they relate to publicly supported housing?"

- "Lack of regional collaboration"

- "Educate people from the area because people get comfortable, most people don't do anything until it affects them"
- "We need to educate more individuals"
- "And to get a place like that, you need policy on city, county and state [levels] that will encourage that. When state changed its policy, it's got to be pushed by the right policy"
- "I think that housing policy needs to reflect that it [housing] is not the box that you live in, it is the sum of everything in the neighborhood, the parks, the schools. If you can't find policies that fix problems in the neighborhood … step by step, district by district"
- "It should be necessary for the city to make sure that there are enough units to accept vouchers"
- "There is nowhere to live with a low income"
- "They will take your application and rip it after you leave"
- "The continuation of building public housing in the same area over and over"
- "Tenant-based voucher allow to move where you want to. This information need to be out there"
- "I don't know about District 9, but in west Dallas I see people being displaced by economic pressures"
- "Proximity to grocery stores"
- "You must be in a specific ZIP code to have some help with vouchers"
- "You have three months to use your voucher and three months extension to find an apartment, so six months total"
- "The political side would slow us down"
- "Cutting down on regulations"
- "Some people don't care enough to stop the city from [this type of] decision-making"
- "The city needs to share plans with the community to avoid problems in the future instead of just approving"
- "Risk of crime is high; businesses don't want to move into areas with high risk of crime"
- "There is not enough awareness for change"
- "Cutting down on some regulations to make things happen"
- "Some law enforcement don't care much for improvement in the area"
- "Perception of the neighborhood is a major issue due to previous shootings"
- "Blight is a large issue at the intersection of Bonnie View and Kiest. And the city is not doing enough"
- "More housing options for low-income clients and people on Social Security with disabilities"
- "Admission and occupancy policies"
- "Displacement due to economic pressure"
- "Policies that ensure equitable boundary determination for financial incentives"
- "Chance to experience game changing housing solution. Other cities are developing better solutions and Dallas can, too"
- "Source of income discrimination"
- "Lack of access to opportunity due to high housing costs"
- "Lot of things can be cultural, but most of the time, it could be economical too"

D. Disability and Access Analysis

1. Population Profile

a. *How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*

All census tracts have less than 10% of disabled residents between the ages of 5 and 17 in 2013 (Figure 162). In that same year, many census tracts in west Dallas, downtown, south Dallas and southeast Oak Cliff have between 10.1% and 20% of working-age adults (ages 18 to 64) with disabilities as residents. Many of these neighborhoods coincide with R/ECAPs and minority concentrations. Census tracts with 10.1%-20% of disabled residents over age 64 appear sparingly throughout north Dallas, south Dallas and southeast Oak Cliff. One census tract in northwest Dallas has between 20.1% and 30.2% of residents over age 64 with disabilities. This area includes several senior housing developments, including those for persons needing memory care, which accounts for the higher concentration.

.

Legend

Nonwhite/White Segregation

Segregation Categories

- Greater white population share
- Same as city proportions
- 0 to <10% greater nonwhite share
- 10 to <20% greater nonwhite share
- 20 to <30% greater nonwhite share
- 30 to <40% greater nonwhite share

Age 5 to 17

Age 18 to 64

Age 65 and up

Legend

- Dallas_Highways
- 0.0 - 10.0
- 10.1 - 20.0
- 20.1 - 30.2
- Null
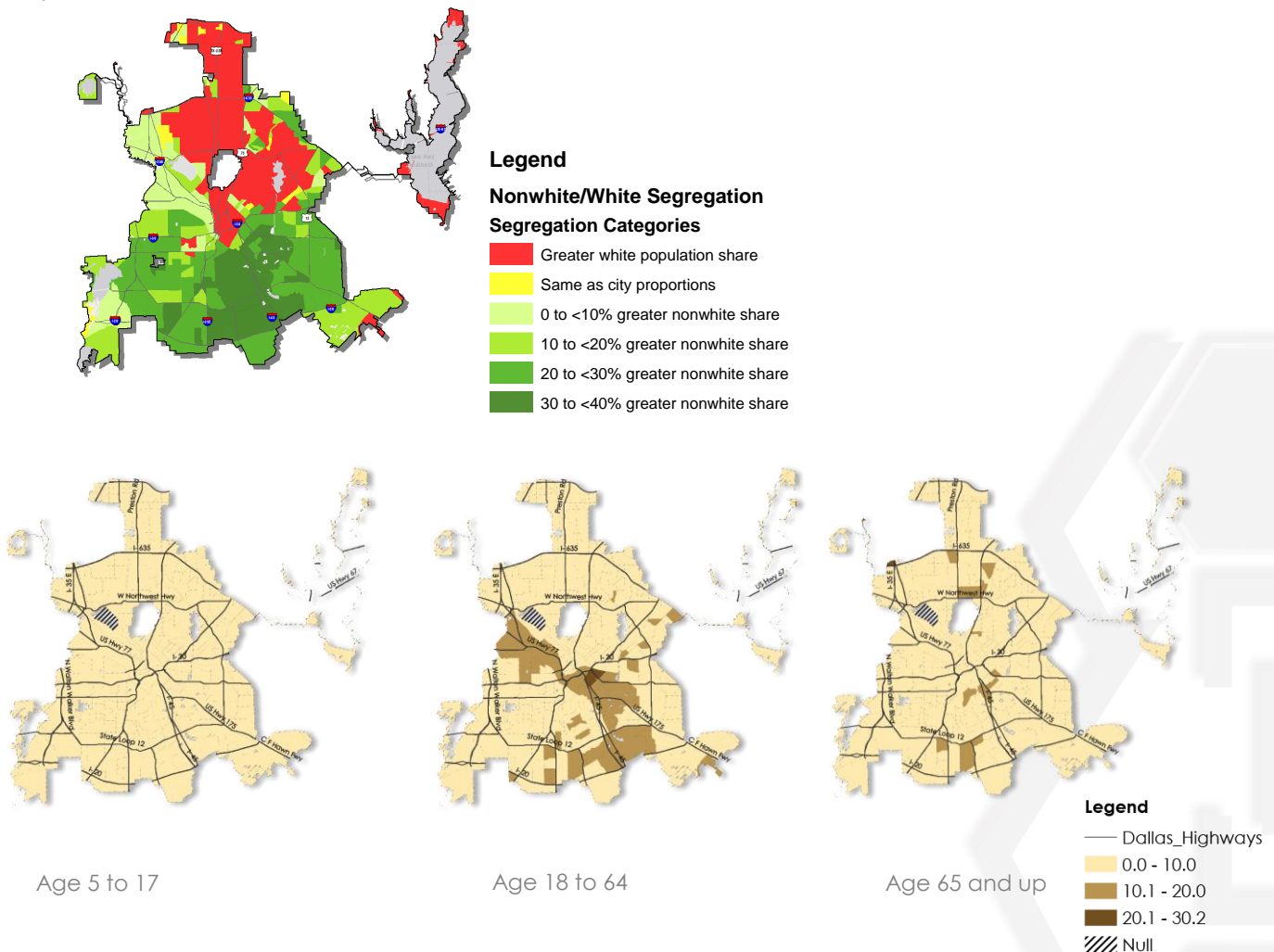
Figure 162: Individuals with a disability by age: spatial patterns, Dallas

All census tracts in the region have less than 10% of residents, age 5 to 17, with disabilities (Figure 163). Census tracts with 10%-20% of working-age adult residents (age 18-64) tend to be in the rural areas. These tracts also appear in lower income and more highly segregated sectors of Dallas (southeast and northwest) and Fort Worth (north, east and southeast). Small pockets of communities with 10%-20% of residents over age 64 with disabilities are in Dallas and Fort Worth (especially where senior housing, assisted living and nursing facilities exist), while most census tracts with high rates of disabilities among seniors occur in rural areas.

Age 5 to 17

Age 17 to 64

Age 5 to 17

Legend

—— Dallas_Highways

0.0 - 10.0

10.1 - 20.0

20.1 - 30.2

//// Null
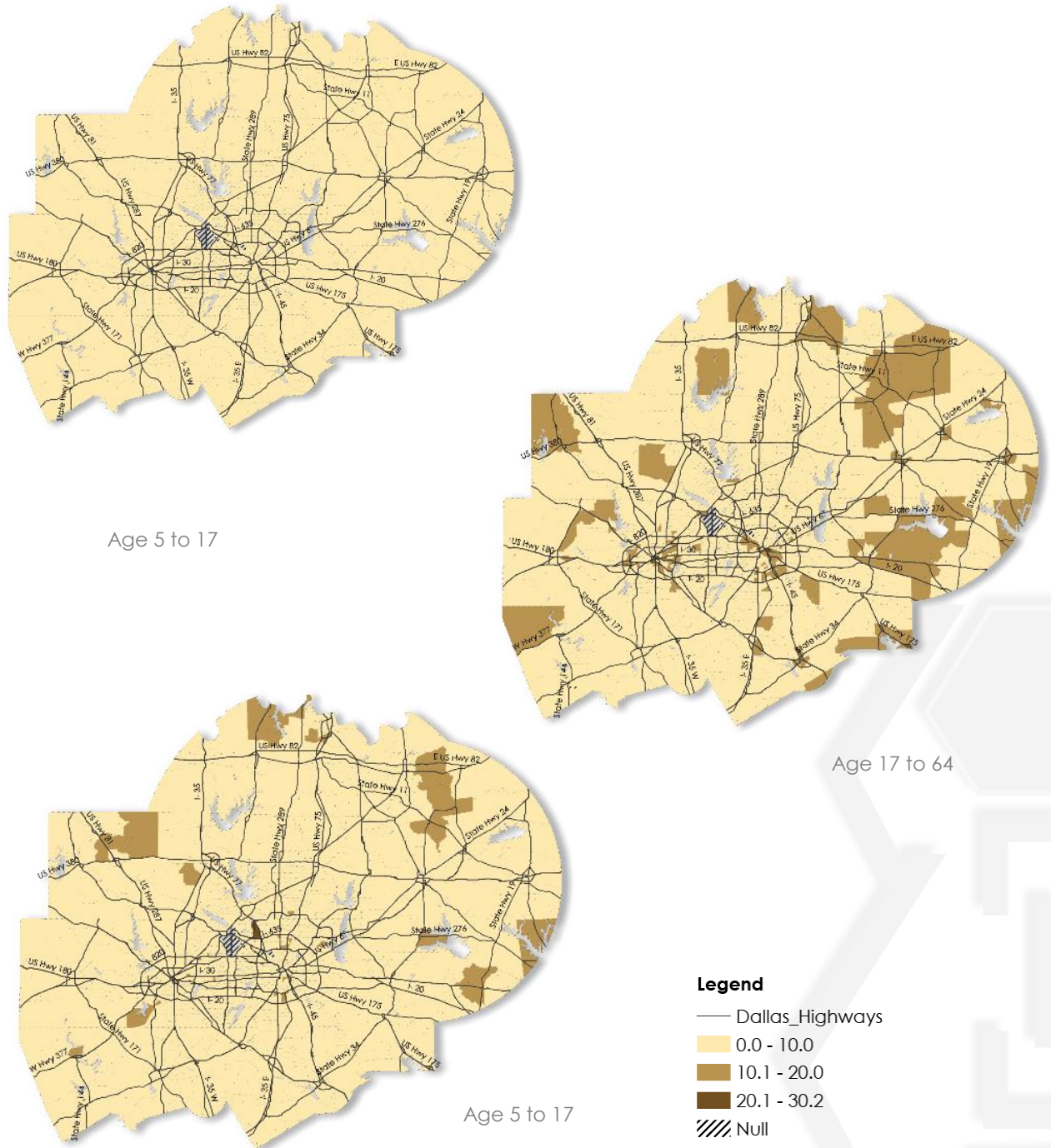
Figure 163: Individuals with a disability by age: spatial patterns, North Texas region

The following maps display rates of different types of disabilities in the general population in 2013 in Dallas and the region. Persons with ambulatory disabilities, as well as those with difficulties living independently, tend to concentrate in areas with higher rates of persons aged 18-64 with disabilities and in neighborhoods that may be R/ECAPs. Census tracts with higher rates of persons with ambulatory disabilities (10.1%-30.2%) appear more widely spread throughout the City and tend to overlap areas with higher rates of other types of disabilities. Areas with lower incomes and higher minority populations, such as neighborhoods near Love Field, Old East Dallas, east and southeast Oak Cliff and southeast Dallas have higher rates of persons with ambulatory disabilities, cognitive disabilities and difficulties with independent living.

Ambulatory   Self-Care   Cognitive

Hearing   Independent Living   Visual

Legend
— Dallas_Highways
  0.0 - 10.0
  10.1 - 20.0
  20.1 - 30.2
  Null
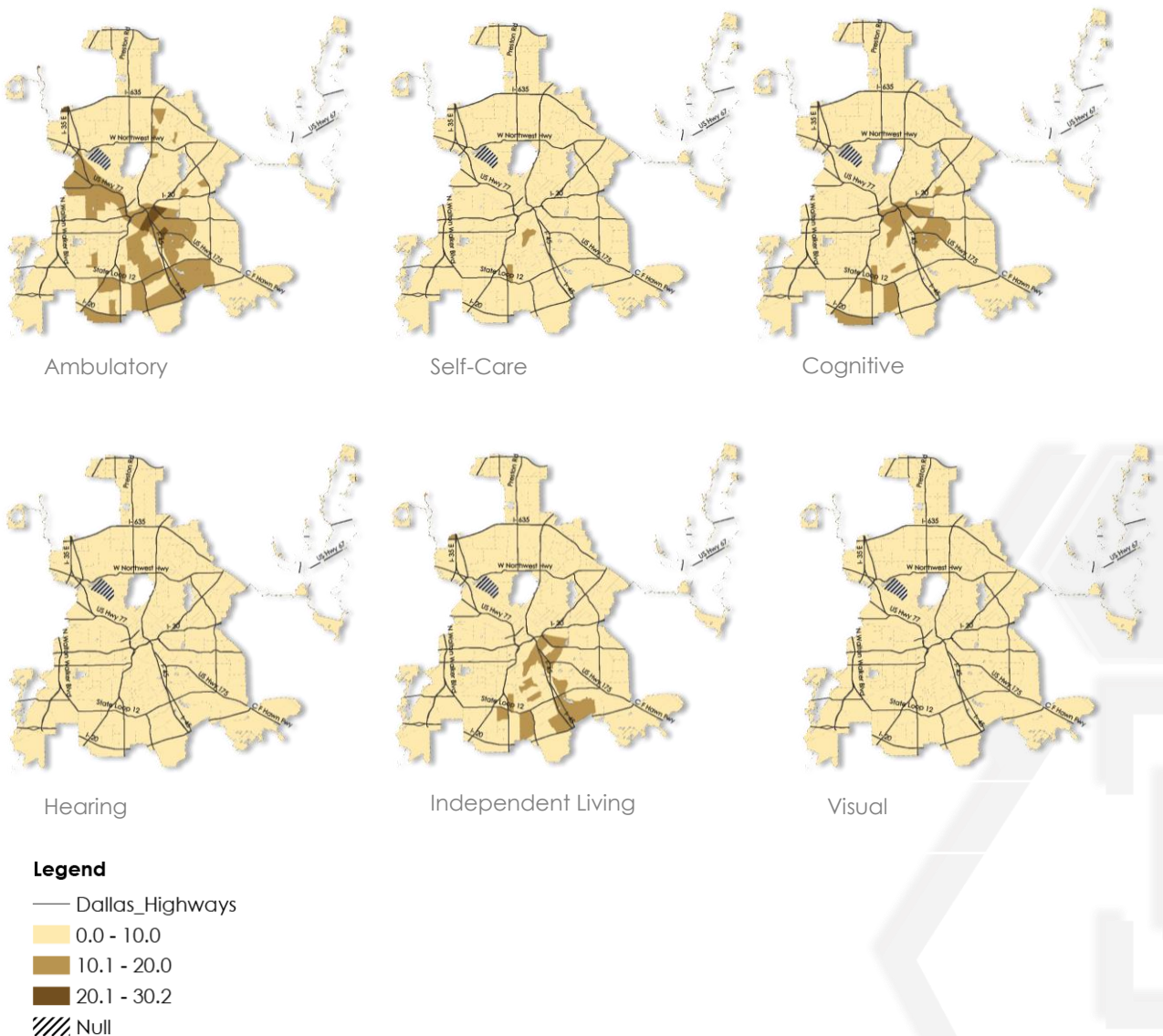
Figure 164: Individuals with a disability by type: spatial patterns, Dallas

Census tracts with higher percentages of persons with ambulatory disabilites (10%-20% of residents) occur throughout the region and appear more common than with other disabilities (Figure 165). Greater concentrations exist in rural areas and in lower income, higher minority sections of Fort Worth and Dallas, primarily in the southeast sections of both cities. Significant concentrations of persons with cognitive disabilities occur in southeast and south Dallas when compared to the region. Residents with independent living difficulties also occur at higher rates in southeast Dallas, which has significant concentrations of minorities and poverty, than in the region.

Ambulatory

Cognitive

Self-Care
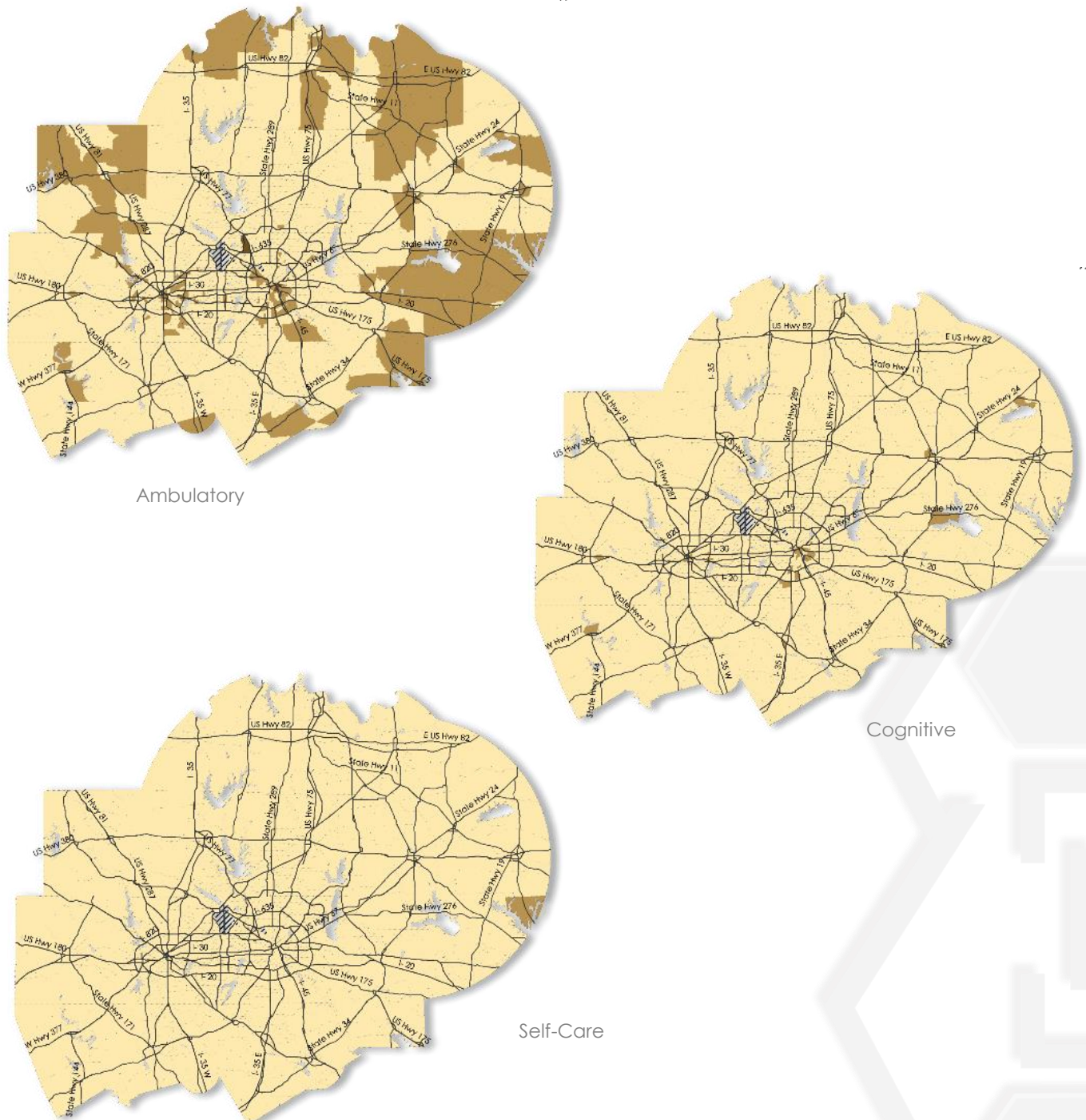
Figure 165: Individuals with a disability by type: spatial patterns, North Texas region

Independent Living

Hearing

Visual

Figure 166: Individuals with a disability by type: spatial patterns, North Texas region

2. Housing Accessibility

a. *Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*

Supplemental Security Income (SSI) is a federal income support program that provides monthly payments to persons who are disabled, blind or age 65 or over and have little or no income and assets of less than $2k (Social Security Administration, 2017). Monthly payments were $721 in 2014 or 18.2% of area median income in the Dallas Metropolitan Statistical Area (MSA). Income earned through wages decreases the monthly benefit by $.50 for each $1 earned (Social Security, 2018). Monthly SSI payments in the Dallas MSA in 2014 equaled 101% of the cost of an average one-bedroom apartment and 84% of the cost of an efficiency apartment (Cooper, Knott, Schaak, Sloane, & Zovistoski, 2015). Thirty-nine percent of renter households, including non-elderly people with disabilities, had incomes of 50% or less of the area median income, received no government housing assistance and paid more than 50% of their income for rent and/or lived in inadequate housing (Watson, Steffen, Martin, & Vandenbroucke, Worst case housing needs: 2017 report to Congress, 2017). Most of the complaints received by Disability Rights Texas, a federally supported advocacy organization for persons with disabilities, concerned inability to find affordable housing (Cohen-Miller, 2017).

Researchers found that 45% of all housing units in western U.S. metropolitan areas in 2011 had some level of accessibility for persons with disabilities but that only 0.16% of housing units were fully wheelchair accessible. Homes built before 1950 had the lowest levels of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). About 89% of housing units in the City of Dallas were built after 1950, increasing the likelihood of accessibility (U.S. Census Bureau, 2016). One-fourth of Dallas' 2016 housing stock was built after 1990, meaning just 25% of housing units were subject to federal requirements that multifamily properties with four or more dwelling units must be adaptable to the needs of persons with mobility impairments (Proctor, 2018; U.S. Department of Housing and Urban Development, U.S. Department of Justice, 2013). In all, 59% of housing units occupied by persons with disabilities in the western U.S. had some level of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). However, only 0.53% of housing units occupied by persons with disabilities were fully wheelchair accessible. This goes some way in showing why accessible housing within the region is insufficient to meet the needs of persons with physical disabilities, especially lower income housing, usually located in neighborhoods with less security (Garnett, 2017).

Approximately 10% of Dallas residents reported some type of disability in the 2016 American Community Survey (U.S. Census Bureau, 2016). Over 65,000 persons with ambulatory disabilities lived in Dallas in 2016, which accounted for 5.7% of the total population (U.S. Census Bureau, 2016).

Table 72 uses numbers from the HUD study of the 2011 American Housing Survey referenced above to estimate the number and percent of housing units in Dallas at different levels of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015; U.S. Census Bureau, 2016). Over 47% of the housing stock might be potentially modifiable to meet the needs of persons using wheelchairs. About 11% of the housing units could be livable for persons with moderate disabilities. Based on the study, we would expect only 2,879 units to be fully accessible to persons using wheelchairs. The table also shows the estimated percent of households with members who have mobility difficulties or use a mobility device living in housing units with each of the levels of accessibility in the Dallas MSA (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015).

Households with members who have mobility impairments do not necessarily live in housing units that are suited to their needs or even modifiable to meet their needs. Many Dallas homes have the potential to be modified, but the challenge is to provide modification assistance and to help persons with disabilities find and afford housing that meets their needs. The greatest barriers to full wheelchair accessibility are lack of extra-wide doorways and hallways and accessible bathrooms (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Higher income residents were more likely to live in accessible units in the Dallas area (64%). Low- to moderate-income families were less likely to live in accessible housing units (43%-47% of residents).

Table 72: Estimate of Dallas housing accessibility based on HUD 2011 findings

Level of accessibility	Est. % of housing units in Western US MSAs (HUD 2011)	Est. # of housing units in Dallas	Est. % of households with disabled members Dallas MSA
Total Housing Units		543,275	
Level 1: Potentially modifiable	47.06%	255,665	57.21%
Level 2: Livable	11.33%	61,553	8.99%
Level 3: Wheelchair accessible	0.53%	2,879	0.27%

b. **Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?**

Figure 167 displays the results of a query for the location of apartments for rent with wheelchair access in Dallas (Costar Group, 2018). Most properties identified in the search are located in or around downtown, with a scattering of units in other areas. While some of these units are in R/ECAP tracts, particularly in south Dallas, the locational diversity in wheelchair-accessible units ensures access to areas that are not segregated and are not within R/ECAPs.
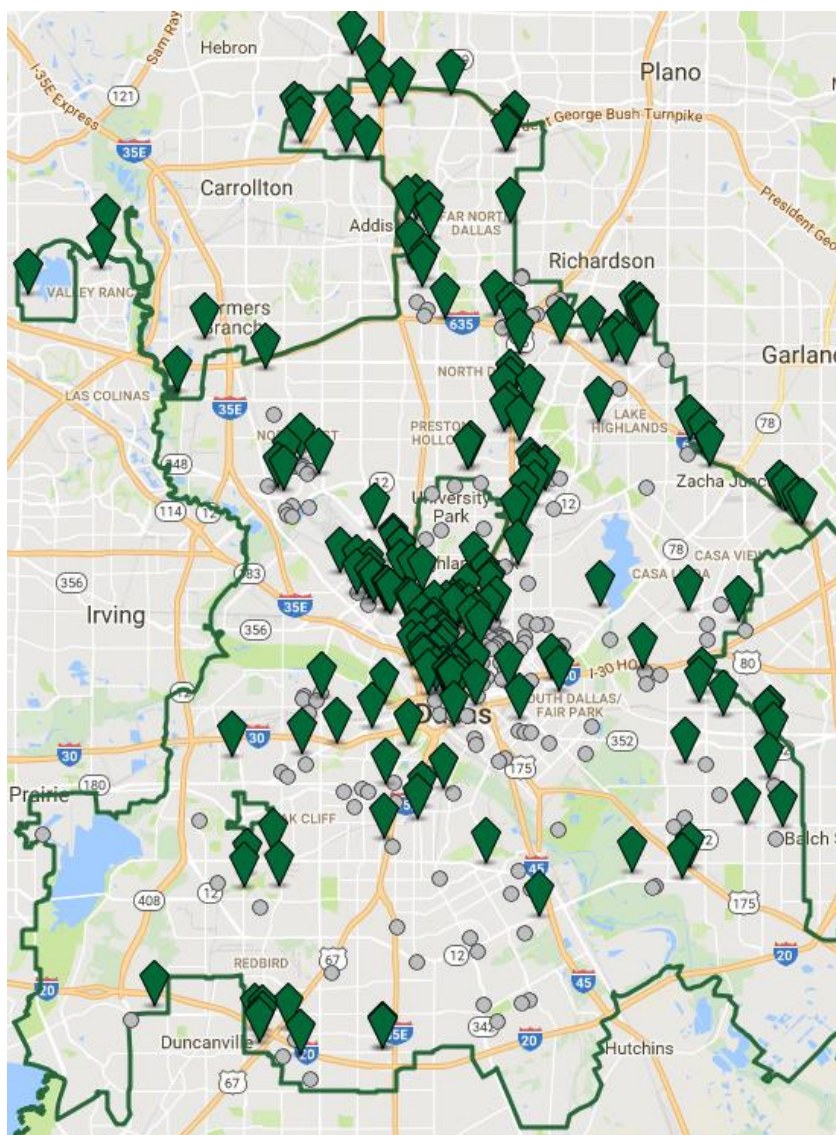
Figure 167: Locations of wheelchair-accessible apartments for rent in Dallas (CoStar 2018)

Narrowing the search to **affordable** apartments with wheelchair access significantly reduces the number of suitable properties. Figure 168 displays the results of a query for the location of affordable apartments for rent with wheelchair access in Dallas (Costar Group, 2018). Most available properties identified in the search are located in south Dallas, with a few in west or east Dallas and a scattering of units in north and south Dallas. While relatively few of these units are in R/ECAP tracts, a number are in areas previously identified as segegated.
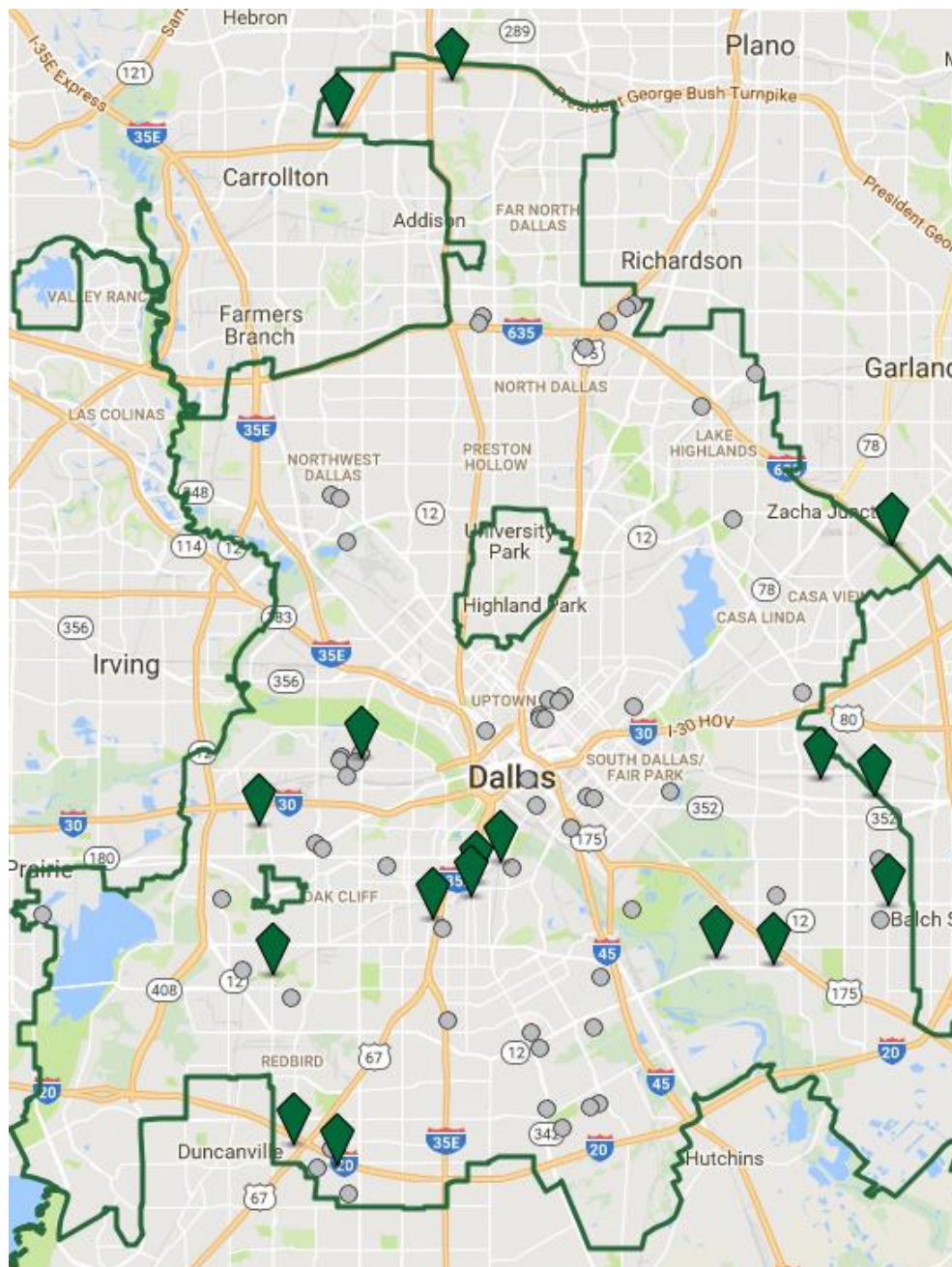
Figure 168: Locations of "affordable" wheelchair-accessible apartments for rent in Dallas (CoStar 2018)

C. **To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?**

Very little information documents the availability of publicly supported housing accessible to persons with different disabilities. The North Central Texas Aging and Disability Resource Center maintains a list of housing by city (North Central Texas Council of Governments, 2018). Table 73 lists assisted living properties in the City of Dallas. In all, NCTCOG lists over 7,400 assisted living units across 120 facilities inside the City of Dallas. Assisted living housing units in the DFW region cost an average of $3,129 per month and are unaffordable to low-income seniors living in publicly supported housing with average annual incomes of $10,000 (Hubanks, 2017; Caring, Inc., 2018). Availability and affordability of assisted living falls far short of the over 64,000 residents with self-care difficulties (U.S. Census Bureau, 2016).

Table 73: Assisted living in the City of Dallas (NCTCOG 2018)

ORGANIZATION/PROPERTY NAME	Address	Number of Units
THE POTTERS PALACE ASSISTED LIVING HOME	4054 HUCKLEBERRY CIRCLE	7
Agape Place II	631 W 10th Street	24
Agape Place Personal Care Home	801 W 10th Street	28
Andrew's Place	2430 Overton Rd.	5
Angel Hands	3337 Gladiolus Lane	6
Ann Arbor House	1712 E Ann Arbor Ave	6
Bluffman House	5557 Bluffman Drive	6
Circle of the Hearts Residential Care - Akar's	8701 Old Homestead	5
COLES RESIDENTIAL HOME	1364 GILLETTE ST	7
Community Homes for Adults Inc.	15606 Moondust Drive	6
Community Homes for Adults Inc.	7628 Village Trail Drive	8
Darnell Residential Care	7532 Gayglen Drive	6
Della's Residential Care	1363 Owega Ave	8
FAITH HOME ASSISTED LIVING	2155 GAYLORD	6
Five Star Quarters Inc.	4023 Mehalia Drive	5
Freemans Assisted Living	6735 Seco Blvd	7
Glen Oak Assisted Living Home	905 Misty Glen Lane	6
Griffins Homecare Haven	1208 Whispering Circle	8
Hazel's Home Care - Fortune	4149 Fortune	10
Hazels Home Care - Highfall	533 Highfall Drive	9
Helen's Care	2318 Morrell Ave	9
Helping Hands Care Inc	2923 Gladiolus Lane	11
Home of Hope	2539 Kirkley Street	8

Hurd Senior Care Home - Russell Glen	1530 Russell Glen Ln.	6
In Milords Hands II	421 Glen Oaks Blvd., Suite A	9
Inspirational Care	707 Hoke Smith	8
Jackson Living Center of Juliette Fowlet Homes Inc.	1230-1250 Abrams Rd.	32
Jenny's Resident Group Care #2	808 W Red Bird Lane	8
Jenny's Resident Group Care #3	7306 Hardwood Trail	8
Jones Board and Care	2826 Maryland Ave	8
Jones Board and Care	612 Misty Glen Lane	5
JOY ASSISTED LIVING	3208 PLUMSTEAD DR	7
Joy Assisted Living II Inc.	2128 Green Point St.	6
Linda Faye Dixon Assisted Living	920 Emberwood	6
Living Peaceful Inc.	3368 Lockmoor Lane	6
Living Peaceful Inc.	3930 Clear Cove Lane	7
Oaks Assisted Living	3327 Springwood Lane	5
Only the Strong Survive Assisted Living	3018 Weather Vane Lane	8
Ora Lee's Group Home	5822 Lake Placid Drive	8
Pearl's Place	1030 Oxbow Lane	6
PROFESSIONAL CARE FACILITY INC	6327 TEAGUE DR	8
Renaissance Assisted Living	7315 Oakstone Drive	6
Rene's Professional Home Care	2829 Seaton Drive	8
Rising Sun Residential Care Facility	6310 Clubhouse Circle	6
Shang's Garden Inc.	2617 Birmingham Ave	6
SHIELD OF FAITH ASSISTED LIVING	1206 DEERWOOD DR	8
St Bernard Assisted Living Facility	6005 Blackberry Circle	9
Stella Rd Assisted Living	1840 Stella Ave	6
Sweet Care Facility	6723 Atha Drive	8
Talco House Inc.	2328 Talco Drive	6
The Forum at Park Lane	7827 Park Lane	38
THE POTTERS PALACE ASSISTED LIVING HOME- ATOLL	2720 E ATOLL DR	8
Town Village North Dallas	12271 Coit Rd	33
Trinity-Faith's Place	2209 INCA DR	6
Trinity-Faith's Place II	2205 Inca	8
V.S. MORALES PERSONAL CARE HOME FOR THE AGING	9508 CIRCLEWOOD DR	12
Vision of Hope	1302 Hendricks	5
3 Angels Caregivers	9754 Amberley Drive	8

Abbey Residential Care Homes Inc	7615 Meadow Rd	12
Assisted Living at Silver Gardens	3980 Deep Valley Drive	8
At Home Elderly Living, LLC	7541 Royal Place	8
Autumn Leaves Personal Care Unit	1010 Emerald Isle Drive	58
Avalon Residential Care Home	4330 Allencrest	12
Avalon Residential Care Home	6217 Crestmere Drive	12
Avalon Residential Care Home	7315 Glendora Ave	10
Avalon Residential Care Home	7355 Royal Circle	10
Avalon Residential Care Home	13215 Hughes Circle	10
Avalon Residential Care Home	6908 Quarterway	12
Avalon Residential Care Home	7212 Canongate Drive	8
Bentley Manor Assisted Living	3344 Forest Lane	108
Buckner Baptist Trew Retirement Center	4800 Samuell Blvd	75
C C Young Memorial Home	4829 W Lawther Dr.	55
C C Young Memorial Home	4847 West Lawther Dr, Suite 100	76
Caruth Haven Court	5585 Caruth Haven Court	95
Chandler Way Assisted Living	9606 Moss Farm	9
Desoto TX Arbor House	8027 W. Virginia	52
EMERITUS AT LAKE HIGHLANDS	9715 PLANO RD	116
Emeritus at Stone Bridge	9271 White Rock Trail	56
EMERITUS AT VICKERY TOWERS	5619 BELMONT	175
Evergreen Assisted Living LLC	6521 Clearhaven Circle	6
Evergreen Assisted Living LLC	6322 Pineview Road	7
Evergreen Assisted Living LLC	16401 Amberwood Rd	8
Evergreen Assisted Living LLC	16830 Hunters Point Drive	8
FOWLER CHRISTIAN APARTMENTS	105 Juliette Fowler St	25
Grace Presbyterian Village	550 E Ann Arbor Ave	71
Gracefield Residential Carehome	7412 Gracefield Lane	8
Hillcrest House	11240 Hillcrest Road	9
Jackson's Place Inc	7210 Duffield Drive	8
Lakeland Hills Assisted Living	3205 Dilido Road	45
Lexington Place Assisted Living Home - Lavendale	7205 Lavendale Circle	10
Lexington Place Assisted Living Home - Meadow	7123 Meadow Road	10
Lexington Place Assisted Living Home - Merriman	7125 Merriman Parkway	10

Lexington Place Assisted Living Home - Royal	3925 Royal Lane	10
Lexington Place Assisted Living Home - Spanky Branch	6906 Spanky Branch	10
Loyds of Dallas Enterprises, LLC	5105 Creighton Drive	8
Manchester Place LLC	7109 Spring Valley	16
Manchester Place LLC	10754 St. Michaels	16
Medallion Senior Living	12400 Preston Rd.	107
Monticello West	5114 McKinney Ave	159
North Texas Personal Care Homes Inc Graystone	17207 Graystone	10
Parsons House Preston Hollow LP	4205 W Northwest Highway	16
Parsons House Preston Hollow LP	4205 W Northwest Highway	51
Presbyterian Village North Assisted Living Facility	8668 Skyline Drive	85
Senior Senior Living of Hillcrest	13001 Hillcrest Rd	115
Signature Pointe On The Lake Healthcare Community A L	14655 Preston Road	76
Silverado Senior Living - Turtle Creek	3611 Dickason Ave	30
St Joseph's Resicence Inc.	330 W Pembroke Ave	49
T L C	7116 Tophill Circle	8
The Family's Choice	7048 Hillwood Ln	8
The Family's Choice	7405 Hillwood Lane	8
The Family's Choice	17217 Graystone Dr	8
The Legacy at Preston Hollow	11409 N Central Expressway	54
The Plaza at Edgemere Assisted Living	8502 Edgemere	101
Trinity Residential Care	1427 Caravan Trail	6
Villages of Lake Highlands Assisted Living	8615 Lullwater Dr	58
Walnut Place P C Unit	5515 Glen Lakes Drive	100
Weismer House	7038 Lattimore Drive	8
Wellington Residential Care LLC	7304 Campbell Rd	8
Wellington Residential Care LLC	6806 Rocky Top Circle	8
Windsor Senior Living	7750 LBJ Freeway	103
Total		7455

Far fewer options exist for individuals with intellectual disabilities who might need dedicated care. Figure 73 shows the address of 64 Dallas units listed by the North Central Texas Aging and Disability Resource Center within intermediate care facilities for individuals with intellectual disabilities. This points to a paucity of options for individuals with a need for specialized care.

Table 74: Intermediate care facilities for individuals with intellectual disabilities in Dallas (NCTCOG 2018)

ORGANIZATION/PROPERTY NAME	Address	Number of Units
14 Ferris Creek	9814 Ferris Creek	6
23 Ferris Creek	12323 Ferris Creek	6
27 Ferris Creek	12327 Ferris Creek	6
Ability Connections Texas Jubilee House	3108 Jubilee Trail	6
Braddock House	6520 Braddock Place	6
Educare Community Living Corporation Texas	14163 Haymeadow Dr.	6
Educare Community Living Corporation Texas	3111 Leharve	6
Educare Community Living Corporation Texas	14255 Haymeadow Drive	6
Educare Community Living Corporation Texas	5922 Lewisburg	6
Henry House	7153 Pineberry	10
Total		64

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. *To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*

The lack of affordable, accessible housing can force persons with disabilities into nursing homes when they might be able to live independently in the community with supportive services (Gooden, 2017). Almost all participants in focus groups expressed the desire to live in an integrated setting in the community with a mix of persons with and without disabilities. Parents and guardians of persons with intellectual and developmental disabilities (IDDs) who participated in NTRHA focus groups were currently supporting their adult children in their own homes and expressed concerns about whether their children would be able to continue to live independently when the guardians were no longer available. Some of these guardians expressed concern that their adult children would never be able to afford to live in the communities in which they grew up and had developed social connections with clubs, Special Olympics teams, jobs and friends. Medicare/Medicaid certified nursing homes were home to 5,196 people in Dallas County in June 2018 with an average bed occupancy rate by county precinct of only 74% (Texas Health and Human Services Commission, 2018).

Facility-based care involves a greater degree of segregation than community-based care. Options for persons with disabilities are limited, especially for those with intellectual and developmental disabilities (ICF/IID). Nursing facilities are the most available yet offer the most segregated setting. Nursing facility placement for persons with disabilities has been shown to contribute to physical and mental deterioration in environments where sexual assault and abuse are problems (Cohen-Miller, 2017). Advocates find serious problems with Texas nursing homes, including licensing violations, lack of state enforcement and sanctions, and quality of care deficiencies (AARP, 2017). Most assisted living facilities serve people with significant disabilities who require monitoring and assistance throughout the night and are unable to evacuate in case of emergency without assistance.

None of the participants in focus groups designed for persons with disabilities lived in segregated housing. Most lived in communities where there were few other people with disabilities. Participants said that they would like to live in communities where there were more people with disabilities than the places they currently lived. Participants said people with disabilities have "limited ways of finding each other" in the community and that this situation was undesirable. The desire to find other persons with disabilities, however, should not be interpreted as indicating that the participants were expressing a desire for segregated housing. Participants clearly prefer community-based, integrated housing, but community-based housing can be isolating without transportation, services and social supports. Participants said they desired to be in "community" with other people like them but within an integrated, community-based setting.

Some focus group participants presented ideas for mutually supportive communities or properties for persons with disabilities and their families, in a community-based setting. One focus group participant had designed a small community of "villas" where persons with disabilities could live in their homes with their own families while sharing personal care assistants and other resources. Some families with higher incomes are developing and using "ranches" that provide supported independent living for persons with IDD, an example of the movement toward protected, community living for persons with disabilities (Down Home Ranch, 2018; Marbridge Foundation, 2018). Costs to live in these communities are $3,600 per month, private pay only. Families in public participation stated that even these programs were not right for everyone and,

due to limited availability, often required individuals to live two to three hours away from family. Some participants are actively seeking resources to purchase homes to share with other families to allow their family members with self-care limitations to live independently, even after their guardians are no longer living. Participants felt that living in close proximity to other persons with disabilities yet within an integrated community helped to fight isolation.

Group homes, or community homes for persons with disabilities, are sometimes subject to special restrictions for spacing or fire safety in local zoning ordinances affecting their location. A body of case law now maintains that restrictions on family homes used to house small groups of persons with disabilities may not exceed restrictions on other family homes unless there is a legitimate government interest (Cohen-Miller, 2017). United States v Beaumont ruled that a one-half-mile separation between community homes was overly restrictive (United States v. City of Beaumont, Texas (E.E. Tex.), 2016). The Texas Human Resources Code Chapter 123 regulates community homes, requiring that such homes not be located closer than half a mile from another community home (State of Texas, 2018).

b. *Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.*

Medicaid and Social Security disability income are the most important resources for persons with disabilities in Texas (Garnett, 2017). Texas offers many programs to provide housing and supportive services to persons with disabilities varying by age and type of disability; however, most are not entitlement programs and have extensive wait lists. Texas' publicly supported options include the following (Texas Health and Human Services, 2018; Texas Health and Human Services, 2018):

- State Supported Living Centers for persons with Intellectual and Development Disabilities (IDD) (cost $232,000 per person per year, 60-460 residents); none located in Collin County (Texas Council for Developmental Disabilities, 2017)
- Intermediate Care Facilities for persons with Intellectual and Development Disabilities (cost $54,000 per person per year, range from six- to 60-person facilities or homes) (Texas Health and Human Services, 2018)
- Home and Community-based Services (HCS); group homes for up to four IDD residents (cost $63,000 per person per year); includes supported home living services; 90,847 on state wait list, wait length up to 13 years (Texas Health and Human Services, 2018)
- Supportive services provided to persons with disabilities living independently or with family members in the community:
  - Community Living Assistance and Support Services (CLASS) (cost $15,000 per person per year) – 64,906 on state wait list, up to 12 years wait
  - Consumer Managed Personal Attendant Services (sliding scale with some cost paid by consumer) – optional program varies by county
  - Deaf Blind with Multiple Disabilities – 357 on wait list, up to two years wait
  - Medically Dependent Children Program – 18,018 on wait list, up to five years wait
  - Primary Home Care, Family Care, Personal Care Services, Community Attendant Services programs – no wait list, limited services
  - Texas Home Living for persons with IDD – 70,714 on wait list, up to nine years wait
  - Star Plus (managed care) – 10,116 on wait list, wait one year
- Independent Living Centers – provide advocacy, information, referrals, training, peer counseling, transition support from nursing facilities to community, assistive equipment loan, includes a regional network of offices, including REACH of Dallas (REACH, Inc., 2018)
- Dallas County Aging and Disability Resource Center – maintain network of housing assistance providers through partnerships with government and nonprofit agencies; provide referral assistance and resource links, including housing (http://www.connecttocaredallas.org/, 2018)
- Dallas Housing Authority (no supportive services) – public housing and Housing Choice Vouchers (dependent on market availability of accessible units)
- Project Access Program – for persons transitioning from nursing homes to independent living who also qualify for the Tenant Based Rental Assistance program; must be HCV or HOME TBRA availability; provides relocation contractors to coordinate with service coordinators (Texas Department of Housing and Community Affairs, 2018)
- Oxford House – nonprofit corporation offering a network of peer-managed sober-living homes for persons recovering from alcohol and drug addiction (Oxford House, Inc., 2018); 32 Oxford Houses in Dallas (Oxford House, Inc., 2018)

- Community for Permanent Supported Housing – nonprofit organization that offers training and assistance to persons with IDD who are preparing to live independently in the community; Project Independence transition program guides guardians through the process of finding housing and supportive services for community-based living (Community for Permanent Supported Housing, 2018)
- Neighborhood Homes – program funded by Dallas Housing Authority to provide subsidized rent through Project-Based Vouchers for housing with a minimum of two bedrooms and two residents with disabilities. PBVs are issued on a competitive basis, and no bids are currently being accepted (Community for Permanent Supported Housing, March 2018)

- United Way of Dallas County – coordinates programs to help persons with Alzheimer's disease remain in community-based housing for as long as possible (United Way of Dallas County, 2018). The Alzheimer's Association of North Central Texas provides one-on-one coaching and support to family caregivers. Easter Seals of North Texas provides weekly respite care that allows family caregivers to take breaks. The Area Agency on Aging provides a training program that teaches family caregivers to manage stress.

4. **Disparities in Access to Opportunity**

a. *To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:*

Government services and facilities

Participants in public meetings and focus groups identified accessibility to government services and facilities as a significant barrier to opportunity both in general and in the following ways:

- Areas on public transit vehicles designed for wheelchairs do not fit modern wheelchairs, especially those that are electrically operated and have accessories for special needs. These areas are too small and seem to be getting smaller.
- Handicapped parking spaces do not fit modern van ramps.
- A participant who serves on an advisory committee for a new public coliseum stated that the building seemed to be designed for people aged 18 to 35 without disabilities.
- Participants with disabilities said there is a lack of accessible community recreation centers both in terms of physical access and in programming for persons with disabilities.

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Participants expressed many concerns over the inaccessibility of public infrastructure. One participant expressed the concern that most single-family neighborhoods were not designed for walk-ability and that the lack of walk-ability affected the health of residents as well as posed challenges to persons aging in place and persons with disabilities. The standard manuals from the Institute for Traffic Engineering that guide municipal planning, according to one participant, still favor high-speed traffic over pedestrian and disability-friendly environments. Multiple participants commented that the inaccessibility of public infrastructure was a growing problem with the aging of the population and the increase in number of persons with disabilities. Additional comments:

- While main streets received attention for improved accessibility, side streets were largely inaccessible.
- Inaccessibility of public infrastructure around places of employment presents barriers to opportunity.
- Bathrooms designed for persons with disabilities are often in use by persons without disabilities and unavailable for extended periods in both public and private buildings.
- Inaccessible (or absent) sidewalks, crosswalks and crossing signals present problems for persons with disabilities, including persons with intellectual and developmental disabilities. These barriers also contribute to lack of access to public transit stops. Participants recognized that lack of accessible sidewalks is also a problem for families with children and the populace in general.

Transportation

Participants stated that lack of public transportation has a disproportionate impact on persons with disabilities due to both low income and inability (for some) to safely operate a private auto.

Complaints about the availability, effectiveness and affordability of paratransit services for persons with disabilities were common in public meetings and focus groups. Paratransit services

were described as "not friendly", requiring appointments to be made by 5 pm the previous day and requiring at least 90 minutes of travel time. Participants reported that paratransit services are not reliable, often causing missed appointments. Guardians of minors with disabilities reported worrying about the level of independence their children would need to engage in further education, jobs and recreation once they exited the public school system and/or their guardians have passed away. Participants said the lack of public transportation impacts independence as well as the ability for persons with disabilities to socialize with friends who also may have disabilities, creating further isolation. Focus group members reported that lack of transportation was a significant barrier to access to food shopping for seniors with increasing levels of disability and low incomes.

Persons with disabilities reported that they did not have accessible bus stops nearby, and some reported not having access to on-demand transit. Public transit authorities must provide door-to-door transit for persons with disabilities within three-quarters of a mile of any fixed-route transit (Dupler, 2017). Paratransit services are very expensive to operate when compared with fixed-route transit (Comfort, 2017). Lack of passable sidewalks contributes to the barriers to fixed-route transit for persons with disabilities.

Participants summarized the importance of transit by saying that, in the words of one, "housing without transportation is a prison" for persons with disabilities.

Proficient schools and educational programs

Texas public schools must provide services to children and youth with disabilities until age 21, including transportation (Garnett, 2017). Twenty-two comments were collected related to lack of access to proficient schools for persons with disabilities. Specific complaints focused on the lack of post-secondary education, especially job training that meets the needs of persons with disabilities. Individuals expressed a need for more supportive services available on campuses. One family explained that they moved their child with intellectual and developmental disabilities into a private (K-12) school with smaller class sizes because the public school had very low expectations for achievement and did not provide educational opportunities that met their child's abilities.

Jobs

In 2015, the Texas Legislature mandated the transition of responsibilities from the Department of Assistive and Rehabilitative Services (DARS) to the Texas Workforce Commission (TWC) and the Department of Health and Human Services, culminating in the elimination of DARS (Texas Workforce Commission, Texas Department of Assistive and Rehabilitative Services, Texas Health and Human Services Commission, 2016; State of Texas, 2016). The transition was to begin in 2016 and complete by 2019. Stakeholders in public engagement expressed concern over the success of the transition (Garnett, 2017). Participants in focus groups for persons with disabilities identified the lack of supported employment opportunities, including supportive services and accessible environments in the workplace, as a barrier to employment.

Texas Medicaid and the Texas Workforce Commission offer supported employment programs in which persons with disabilities get assistance to find and maintain competitive, integrated employment (Texas Council for Developmental Disabilities, 2018). Texas Medicaid programs began to offer supported employment in 2013, but less than 2% of eligible consumers have been approved for or received these services. TWC offers supported employment by contracting with community rehabilitation providers (WorkReady Texas, 2018). Medicaid-supported employment

services are mediated by managed care companies that appear to have little understanding of these benefits (Garnett, 2017). State and federal law allows persons with disabilities working in sheltered workshops to be paid by the piece of work produced as long as the amount paid per hour of work is at least minimum wage. Sheltered workshops are available in the region in Tarrant County only (AMFIBI, 2018). Piece-rate employment can provide important benefits to persons with disabilities but the depressed wages add to problems with the ability to afford housing (Garnett, 2017).

Participants in focus groups stated that persons with disabilities suffer from job loss leading to eviction and loss of housing. One of the participants (herself a person with a disability) had founded and operated a successful employment agency for persons with disabilities. She talked about the need for employment for persons with disabilities and opportunities for job training, perhaps on a sliding scale. She said, "Employment is part of being independent". Another guardian of a person with IDD shared that her son had been bullied on the job, increasing his anxiety problems and forcing him to the quit the job. Her son had gotten the initial job through the Department of Assistive and Rehabilitative Services. DARS helped him to find a subsequent job with job search and job coaching services. The owner of the employment agency talked about a friend with disabilities who worked for a company that allowed him to have a flexible work start time for days when his attendant was late or unavailable and he was delayed. Participants indicated that not enough companies are willing to make these kinds of accommodations and affirmed the need for more customized employment opportunities and on-the-job supportive services. Many participants said they did not have access to a workplace in which they could "get around and work in safely". Texas law allows employers to pay 'piece rate' as long as total pay for each seven-day period equals at least the Federal minimum wage for the number of hours worked (Texas Workforce Commission, 2018). The program also allows these companies to pay employees with disabilities less than the federal minimum wage, sometimes as little as 61 cents per hour to adjust for lower productivity (Walters, 2016). A guardian with a son with IDD participating in a State Use program said persons with disabilities need to be "paid a decent wage – not 8 cents a bag of folded towels".

b. *Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

The Fair Housing Act requires that owners and landlords of multifamily housing (excluding owner-occupied properties with four or fewer units) permit the modification of existing premises at the renter's expense if required to enable full enjoyment of the property, especially by persons with disabilities (U.S. Department of Justice; U.S. Department of Housing and Urban Development, 2008; Disability Rights Texas, 1996). Dallas Housing Authority documents its process for requesting reasonable accommodations and has published its Request for Reasonable Accommodation Form online (Dallas Housing Authority, 2018). Persons must request a reasonable accommodation. Dallas Housing Authority has a 504 ADA coordinator who will contact the medical practitioner to verify the accommodation is needed (Dallas Housing Authority, 2016). The City of Dallas also maintains a process to allow residents to request a reasonable accommodation to modify dwellings or parking spaces as necessary (City of Dallas, 2018).

C. *Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.*

Low income is the primary barrier to homeownership for persons with disabilities. Persons with disabilities have virtually no possibility of owning a home due to cost (Cohen-Miller, 2017). Participants in public engagement events echoed this statement. Persons who are aging in place also find it difficult to maintain their homes and continue to meet city codes for property maintenance without assistance or reasonable accommodation (Cohen-Miller, 2017).

Families contemplate buying homes for their family members with disabilities, but the additional costs of maintaining a second home (taxes, mortgage, utilities) make the project unaffordable, according to participants in focus groups. The Home and Community-based Services (HCS) program provides services to persons with IDD living with their own family, in their own home or other community-based housing such as small group homes (Texas Health and Human Services, 2018). Program participants in shared housing split all costs of room and board for the property and pay for them out of SSI benefits. SSI does not supply sufficient income for homeownership. Participants said HCS providers in their community have difficulty finding affordable homes to purchase.

Project-based vouchers are an avenue by which developers or families could buy homes for group living and rent them to persons with disabilities and receive Section 8 rent subsidies to pay the difference between what SSI recipients can afford and the cost of operating the home. Section 8 does not normally permit rental of housing to family members, but the practice may be approved by the housing authority as a reasonable accommodation for a family member with disabilities.

Participants in focus groups said the only way their family members with disabilities could own a home would be for a group of families, with compatible persons with disabilities, to buy a home together. Participants say that finding compatible residents as well as compatible families who will share responsibilities equally is a challenge.

5. Disproportionate Housing Needs

a. *Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.*

The greatest amount of public input on disproportionate housing needs for persons with disabilities came from discussions about the **lack of in-home or community-based supportive services**. The following needs emerged from public meetings and focus groups:

- Medical support, especially in-home or community monitoring for emergencies
- Supervision for safety
- Assistance to get out of bed, dress and prepare to leave the home for employment or other community activities
- Day activities to prevent isolation and support community integration
- Legal support and guardianship-type services that enable supported decision-making and choice
- Transportation
- Need for housing modifications
- Safe neighborhoods for vulnerable people
- Supported recreation opportunities

Many participants discussed the importance of recreation and supports that enabled persons with disabilities to get out into the community. Guardians said that persons with disabilities need day programs that enable them to be productively active with shopping, dining, attending community events and recreation. During a focus group, participants (guardians and persons with disabilities) were asked to draw their "dream home" and their ideal community. One of the participants with intellectual and developmental disabilities filled her drawing with recreation and activities, including sports, music making and job training opportunities. These comments were highly related to the desire to live in an integrated community that was not like "an institution".

Participants said Texas Medicaid waiver programs were insufficient to provide the supportive services needed. One guardian was very frustrated because his son, a person with intellectual and developmental disabilities who is not able to live independently without support, had been dropped completely from waiver programs because he did not need skilled nursing services and the guardian had no idea what to do. Participants emphasized the importance of housing that is integrated with services and supports and maximizes community integration.

Persons with multiple disabilities, including mobility and respiratory problems, find few housing options. The number of nursing homes that will accept ventilator-dependent patients is highly limited in Texas and quality of care has been deficient, leading to closures (Hopper, 2002; Associated Press, 2007; Hearst Newspapers LLC, 2007). Medicaid waiver programs provide for community-based housing for persons with ventilators, but the transition is challenging. The person must have affordable housing that is accessible and can support the physical demands of the ventilator equipment. The person must also be able to hire attendants who are able to learn the challenging tasks of maintaining ventilator equipment and supporting respiratory health (Hill & Brewer, 2014). Caregiver compensation at $8-$9 per hour is inadequate to retain skilled caregivers. A working group met briefly with Texas Health and Human Services to identify the needs of ventilator-dependent people in the community with little success. Many

participants in public engagement find little assistance for transitioning from nursing homes to community-based housing.

6. Additional Information

a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.*

Community opposition

Community opposition is a significant barrier to housing access for persons with disabilities, according to representatives of Disability Rights Texas, a nonprofit organization funded by Congress to protect and advocate on behalf of persons with disabilities (Cohen-Miller, 2017).

Intellectual and developmental disabilities

Susan Garnett, CEO of MHMR of Tarrant County and a member of many organization boards and state commissions, described the situation facing families living with members with intellectual and developmental disabilities in Texas (Garnett, 2017). Middle-income and upper-income families are banding together to purchase homes or apartments where their family members can live independently with supports now and after their guardians' death. Lower income families, especially the great number living in families with multigenerational poverty, have no options. They are living with their children and relatives with IDD and face significant problems in finding and maintaining affordable housing where their family members are accepted. Many of these lower income families are dealing with multiple family members with disabilities.

Ms. Garnett gave the example of a mother with a 13-year-old son with IDD. The mother has been evicted from apartments because her son's behaviors make other residents uncomfortable. The reasonable accommodation process was not able to address the situation. Another mother who works as a waitress approached MHMR for services for her 15-year-old son and found a 12-year wait list to get her son into the HCS program. She is unable to find or afford sitters for her son and has been forced to lock him in her car while she's at work, checking on him frequently, jeopardizing her employment. Children are not generally eligible for after-school services after age 13 in Texas.

Need for Further Action

In its Frequently Asked Questions, the Community for Permanent Supported Housing lists the following factors among those illustrating the need for further work to provide for accessible housing (Community for Publicly Supported Housing, 2018):

- Most concentrated populations of people with intellectual/developmental disabilities is located in North Texas.
- About 100,000 North Texas adults have an IDD and at least one independent living difficulty.
- Enough beds will be available for about 3% of this population when their primary caretaker is no longer able to help them.
- Caregivers (mostly parents) are aging; 20% are 60+ years old, and 35% are 41-59.
- Neighbors are not aware of the capabilities of people living with disabilities.

b. *The program participant may also describe other information relevant to its assessment of disability and access issues.*

<u>Access to supportive services</u>

Many participants in focus groups for persons with disabilities identified problems with the affordability of quality caregivers and personal care attendants. Parents reported having to leave the workforce to provide care for family members due to the lack of affordable, quality caregivers. Participants reported that low reimbursement rates for caregivers hired through Medicaid programs are a barrier to quality care. Few resources exist to assist families in developing a network of caregivers.

Reimbursement rates are universally low across the U.S., averaging slightly more than minimum wage (LeBlanc, Tonner, & Harrington, 2001). The Texas Home and Community-based Services Workforce Advisory Council found that Texas had among the lowest rates in the nation and that low wages seriously impaired the ability of the state to meet current and future needs for direct-support workers (caregivers) (Texas Department of Aging and Disability Services; Texas Health and Human Services Commission, 2010). The advisory council found that high turnover among direct-support workers was caused by low wages, physically demanding work and the lack of health insurance, resulting in no opportunity to avoid or leave nursing home care. The annual 2016 mean wage for personal care aides in the Dallas-Plano-Irving metropolitan area was $18,790, the lowest of all occupations (U.S. Department of Labor, 2016). The median hourly wage was $8.83. The base wage for community attendants working in the Texas Medicaid system is $8 per hour, and 54% of attendants surveyed used means-tested public assistance (e.g., SNAP) (Ginny McKay Consulting, 2017).

7. Disability and Access Issues Contributing Factors

In Dallas, the contributing factor to disability and access issues that came up most frequently was a **lack of affordable, integrated housing for individuals who need supportive services**. This relates to other issues cited, including **lack of affordable, accessible housing in a range of unit sizes; lack of access to opportunity due to high housing costs;** and **lack of affordable in-home or community-based supportive services.** Participants in focus groups specially designed for persons with disabilities and their guardians reported being able to afford between $150 and $700 per month for rent, with most reporting around $300. They said that housing did not exist in their community at these price points. Persons with disabilities make up a high percentage of individuals seeking affordable housing and so are disproportionately impacted by any factors that make housing unaffordable (Cohen-Miller, 2017). Participants reported that affordable units were not in good condition and that landlords were not helpful in making repairs and assuring safe and healthy conditions.

Most participants with disabilities said they would not be able to live independently without supportive services and felt they needed to be able to live near family because community-based supportive services were not available. Participants identified a lack of affordable assisted living centers that could provide safety, supervision and meals. Persons living independently in their own homes identified a need for services that assist with delivered meals and home repair. Participants reported having to leave the workforce in order to provide support to family members.

The second most cited contributing factor to disability and access issues in Dallas was **access to transportation for persons with disabilities.** Residents noted the lack of reliable service with sufficient coverage, leaving persons with disabilities unable to reach their location on time. Participants from independent living apartment projects said that, while some transportation was provided by the facility, it was inadequate. They did not have the transportation they needed to shop or participate in community activities. Participants also identified problems with the service provided by local paratransit, including long trips, overly restrictive pick-up rules and lack of drivers trained to work with persons with disabilities, especially persons with intellectual and developmental disabilities. Individuals also cited issues with Dallas Area Rapid Transit, with multiple references to a collective sense that DART is not prepared to deal with individuals who have disabilities.

Lack of access to publicly supported housing for persons with disabilities was identified as another contributing factor, as well as state and local laws or policies that limit access to publicly supported housing. Participants identified an inadequate availability of publicly supported housing in their communities, forcing persons with disabilities to move away from their support systems.

The Community for Permanent Supported Housing suggests that it is within the law for housing authorities to award project-based vouchers to homeowners who plan to provide group housing for persons with disabilities, even if one of the residents is related to the homeowner. Some housing authorities contend that recipients of PBVs (developers/landlords/owners) may not be related to any of the residents. Many guardians participating in focus groups hoped their adult children would be able to find housing in group homes or that they might collaborate with other guardians to purchase homes for their children to live in independently. The cost of purchasing an additional home in a high-opportunity community is prohibitive, and additional resources and public-private cost-sharing arrangements are required to implement this strategy.

Inaccessible public or private infrastructure: Participants in focus groups identified the need for improvements in the accessibility of streets, sidewalks, traffic signals, bus stops and recreation centers.

Lack of assistance for housing modifications: Participants in focus groups and public meetings identified unmet needs for housing modification.

Gaps in **access for persons with disabilities to proficient schools:** Participants in public engagement identified a need for programs at the community college level to provide greater assistance to develop skills for the job market for persons with disabilities.

Laws and policies: Participants in focus groups identified barriers to using the project-based voucher program to develop group homes that might include family members of the owner/developer.

Sample comments from the appendix:

- With $730 SSI as my daughter's only income, $300 is reasonable. What is available for $300? Nothing!
- Want a neighborhood with friends like me to socialize with, different people to be role models, people with different hobbies, people who would exercise with us.
- We would love to have our daughter close by; she's 22 and lives at home but would like to live with two other little girls so she can do her chic thing. There's nothing remotely close (that's affordable). She has her girlfriends, her Special Olympics team and her entire social circle. It breaks her heart to think of leaving. So my husband and I are looking to buy a home but it's difficult. We may have found something but it's a stretch. But not everyone can do that. Affordable housing, Section 8, they need that. The closest place is 2-3 hours away. And it's just horrible. I mean she'd have to leave her job her buddies, her team, everything. There just really needs to be more that's available to them.
- My daughter cannot comb her own hair, cook for herself or maintain personal hygiene. If a fire or flood occurred, she would freak. She can't drive and has bad motor skills.
- I believe my daughter, 21, with autism, epilepsy and intellectual disability, will never be independent. She will always need much support.
- Providers of supportive service programs, such as the Medicaid HCS program, do not buy or rent homes in Collin County as they are too expensive. We are waiting for other families in our situation that will share the cost of a house.
- Finding an accessible, affordable home is incredibly difficult. The demand is entirely greater than the supply. The lag time for getting an accessible home is years.
- Housing is very high. For a two-bedroom it was about $2,000 and something (rent); just for a two-bedroom.
- The places where apartments are affordable aren't very safe. The area where they (my grandson and his roommate, both with disabilities) are living you would think they are safe, but they aren't. The issues are health and safety for them. If the guys didn't have parents to advocate for them, who is there to help them make sure it's safe and healthy for them (before they move in).
- We didn't get a chance to see the unit before move-in because the tenant moved out late. There was animal urine, the sink was leaking, there was mold, the tub had been resurfaced but the epoxy was peeling, tiles were cracked, there was a hole around the faucet you could put your hand in, a six-inch step up that was a safety hazard, actively growing mold on the air conditioning unit, no smoke detector in my grandson's room. A punch list of 30 things the day they moved in. We're still fighting with them. I'm getting ready to go to one of these TV outlets for help. My grandson is asthmatic and the active mold is a danger. It's even

in all the vents. It's been a month and I went to the young girl (property manager) and said, the health and safety issues, how do you think this is going to play on the evening news with two young men who are disabled? Within two days they were in the unit making repairs.

- I am concerned that as I get older I won't be able to stay in my place since it is a two-story. I would like to see single-story townhomes.
- There are only so many apartments that are retrofitted for mobility issues. When they have only three units they can charge what they want for them. Small supply and high demand.
- Transportation service at our independent living facility is weak. We just have one bus and one van for 500 residents.
- Everyone in this room and in Texas who have family members who need assistance – the reimbursement rates (on Texas Medicaid programs for personal attendant care) given to caregivers are so low that it, in and of itself, is a barrier to getting quality care for our family members. I just stopped working and came home to take care of my daughter.
- From my standpoint as a single parent, there is no one who can provide all that I do for him (my son with IDD) that will allow him to live independently. And even when he does (live independently), the transition will be me. I'll be over the transition, paying the caregivers; there isn't someone to replace me right now. I'm the quarterback and that's what worries me. That one day I won't be able to do that. So now instead of five years, I'm thinking longer term because if I'm not there, there will be no one else to be the quarterback. And we did move here to be closer to family and they came together to allow me to go on vacation with my older son, but it took six of them to do it for 10 days. They tried really hard and did their best but they just aren't trained to do it. It was really nice; the first time I've been able to do that in 20 years. But it took six of them to replace me. There's no one who can replace me right now.
- There is an agency that will come into your home every week to get your loved ones ready for independent living; the Coalition for Permanent Supported Housing has a great program. The issue is when we get them ready there is no place for them to go (that's affordable). Caregivers are poorly paid and you have to be on a waiting list for a long time to get to the (Medicaid) program.

E. Fair Housing Enforcement, Outreach Capacity and Resources Analysis

1.	*List and summarize any of the following that have not been resolved:*

A charge or letter of finding from HUD concerning a violation of a civil rights-related law;

- N/A

A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;

- N/A

Any voluntary compliance agreements, conciliation agreements, or settlement agreements 40 entered into with HUD or the Department of Justice;

- ✓ Response: The City of Dallas was under a Voluntary Compliance Agreement (VCA) with HUD from November 2014 through November 2017. The City fulfilled the requirements of the VCA. Copies of the compliance reports will be provided under separate cover.

A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;

- N/A

A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or

- N/A

A pending Administrative complaint or lawsuit against an individual or company alleging fair housing discrimination

- ✓ Response: There is one pending Fair Housing complaint filed against the City, Center for Housing Resources, Inc. vs City of Dallas, [HUD: 06-17-6202-18]. This complaint was filed based on the alleged denial to allow an affordable housing project in the northern section of Dallas and is being investigated by HUD.

If a client is a FHIP or FHAP, request a copy of their annual report to HUD

- ✓ Response: The City provides HUD an Annual Summary of Case Closures and Training and Outreach Activities as part of the Annual Grant submission. Annual Summaries will be provided under separate cover.

2. *Describe any state or local fair housing laws. What characteristics are protected under each law?*

SUBSTANTIALLY EQUIVALENT
Are they substantially equivalent to the federal law/rule?

Response: The City of Dallas' Fair Housing Ordinance, Chapter 20A, is substantially equivalent to the federal Fair Housing Act. The City of Dallas Fair Housing Office received its certification of substantial equivalency April 24, 1995.

PROTECTED CLASSES
Any additional protected class(es) beyond Fair Housing Act?

Response: The Dallas City Council adopted Ordinance 46 in April 2002 prohibiting unlawful discriminatory practices related to sexual orientation and gender identity. The ordinance not only addresses issues related to housing discrimination but also in employment and discrimination in places of public accommodation.

Oct. 31, 2016, the City of Dallas amended the Fair Housing Ordinance, Chapter 20A, to add "Source of Income" as an additional protected class. This new protection addresses discriminatory practices related to financial sources such as disability, Social Security, spousal support, child support, veterans housing assistance vouchers and in some circumstances Section 8 housing vouchers.

Additional Comments: Response: LGBT is not identified as a protected class under the federal Fair Housing Act; however, issues related to discrimination because of an individual's sexual orientation and/or gender identity are prohibited under the City's Chapter 46, "Unlawful Discriminatory Practices Relating to Sexual Orientation". This ordinance prohibits discrimination based on sexual orientation in housing, employment and public accommodations.

Chapter 20, Fair Housing Ordinance, was amended to include "Source of Income" as a protected class. This protection is not prohibited in the federal Fair Housing Act. This amendment includes protections for holders of any Housing Choice Vouchers against discrimination from housing providers who benefit from subsidies approved by the Dallas City Council.

REMEDIES AT LAW
What remedies at law do they offer (i.e. administrative penalties, fines, criminal punishments, etc.)?

Response: An offense committed under this Chapter 46 ordinance is punishable by a fine of not less than $200 or more than $500.

If a respondent party is found by the Administrator and the City Attorney to have violated the Chapter 20 Ordinance, the City Attorney, upon the request of the Administrator, shall initiate and maintain a civil action on behalf of the aggrieved person in the state district court seeking relief under this chapter. Venue is in Dallas County, Texas.

In some instances, the City Attorney will contact the parties [both complainant and respondents] and work out a "settlement". Under the settlement agreement the complainant party is made whole of all damages incurred and there is provision to address issues related to protecting the "public interest". Most of these settlement agreements similarly mirror in format and language the Conciliation Agreements facilitated by the FHO during the investigative stage of the process. Under a Conciliation Agreement, the parties to the investigation reach an agreement to resolve the fair housing complaint. Under the terms of the conciliation, the respondent parties agree to make the complainant party whole of damages incurred. In addition, the respondents are required to attend fair housing training and provide monthly monitoring reports to the FHO. These reports that are submitted to the FHO focus on specific housing practices related to the issue alleged in the complaint matter.

TEXAS FAIR HOUSING LAW(S)
Review Texas state fair housing law (Texas Fair Housing Act).

Response: The City of Dallas Fair Housing Office does not have authority to enforce state law. Thus, the FHO does not enforce or investigate complaints related to the Texas Fair Housing Act.

The Texas Fair Housing Act, Property Code, Title 15, Chapter 301, states that persons may not discriminate in the sale, rental, terms or conditions of housing based on race, color, religion, gender, familial status or national origin (State of Texas, 2018). The state code includes a section titled "disability" that prohibits discrimination on the basis of disability in all aspects of sale, rental, terms and conditions, refusal to permit reasonable modifications, and design and construction of multifamily dwellings (after March 13, 1991, with four or more units). The state code includes the city exemptions plus an exemption for housing exclusively for elderly persons.

3. *Identify any local and regional agencies and organizations that provide fair housing information, outreach and enforcement, including their capacity and the resources available to them.*

The agencies listed in the table below provide fair housing outreach, information and enforcement in the region.

Name	Website	Address	Number
City of Dallas Fair Housing Office **FHAP *(Local)***	http://dallascityhall.com/departments/fairhousing/Pages/default.aspx	1500 Marilla Street, Room 1B North Dallas, TX 75201-6318	(214) 670-5677
Fort Worth Human Relations Commission **FHAP *(Local)***	http://fortworthtexas.gov/humanrelations/housing/	1000 Throckmorton Street Fort Worth, TX 76102-6312	(817) 392-7525
Garland Office of Housing and Neighborhood Services **FHAP/FHIP *(Local)***	http://www.garlandtx.gov/gov/hk/housing/fair/default.asp	210 Carver Street, Suite 102A Garland, TX 75040-7386	(972) 205-3316
Fort Worth Regional Office of FHEO *(Regional)*	https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint	U.S. Department of Housing and Urban Development 801 Cherry Street, Unit #45, Suite 2500 Fort Worth, Texas 76102	(817) 978-5900 (800) 669-9777 (817) 978-5595
Tarrant County Housing Assistance Office **FHAP *(Local/County)***	http://access.tarrantcounty.com/en/housing-assistance-office/about-us/fair-housing.html	2100 Circle Drive Fort Worth, Texas 76119	817-884-1111
North Texas Fair Housing Center	http://www.northtexasfairhousing.org/	8625 King George Drive, Ste. 130 Dallas, TX 75235	(469) 941-0375

The HUD **Fair Housing and Equal Opportunity** (FHEO) office in Fort Worth receives complaints from throughout the region. The mission of the FHEO is to "eliminate housing discrimination, promote economic opportunity and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development and public understanding of federal fair housing policies and laws. FHEO protects people from discrimination on the basis of race, color, religion, sex, national origin, disability and familial status" (U.S. Department of Housing and Urban Development, 2018). HUD maintains a list of cases filed by type and name of alleged party in violation. Complaints can be filed online, by mail or phone, including accommodations for persons with disabilities. Investigations are completed within 100 days of receipt of complaint or the complainant is notified. HUD may refer complaints to local offices that have been approved to handle housing discrimination investigations. The local office must begin work within 30 days of the assignment or HUD reassumes responsibility for the complaint. The HUD website offers possible immediate assistance with judicial relief if a situation of irreparable harm is imminent or a clear violation exists. Services are offered at no cost. Complaints resulting in a finding of discrimination must be heard by a court within 120 days of the finding. The national FHEO organization consists of 24 offices, including programs, investigations, enforcement, administration, planning and budget, information services and communications, field oversight and legislative initiatives. and outreach. The Fort Worth office (Region VI) is staffed by two directors and one additional contact person (U.S. Department of Housing and Urban Development, 2018).

The **City of Dallas Fair Housing Office (FHO)** is a participant in HUD's Fair Housing Assistance Program and is funded to enforce local fair housing laws that are substantially equivalent to the Federal Housing Act (U.S. Department of Housing and Urban Development, 2018). The Dallas

FHO receives housing discrimination complaints, investigates complaints, conducts conciliation and mediation, offers fair housing training, approves and monitors Affirmative Fair Housing Marketing Plans, maintains a list of publicly assisted affordable housing, produces a Housing and Disability Resource Guide and monitors ADA compliance for Dallas and the region (City of Dallas, 2018). Training and complaint procedures can be accessed through the website. Training is offered on a customized basis, including speaking at events such as the MetroTex Leadership Academy for real estate agents (MetroTex, 2018). Training and presentations are offered free of charge.

The **Human Relations Unit** (HRU) of the City of Fort Worth has the authority as a Fair Housing Assistance Program funded by the federal government to receive complaints and investigate and enforce violations of city and federal fair housing laws (City of Fort Worth, 2018). The HRU also provides fair housing information, outreach, conciliation services and supports the work of the Fort Worth Human Relations Commission (monthly meetings). The HRU also supports the Mayor's Committee on Persons with Disabilities (monthly meetings), provides training for ADA coordinators and City department liaisons, hosts ADA/FHA training for City employees, hosts a public film series addressing matters important to protected classes, participates in a City diversity and inclusion committee, and supports special events and projects around special populations (Fort Worth Human Relations Commission, 2017).

The **Texas Workforce Commission** (TWC) accepts complaints of housing discrimination for locations other than Dallas, Fort Worth and Garland, where fair housing offices are located, and for complaints that have not previously been submitted to HUD (Texas Workforce Commission, 2018). TWC maintains a website with information on fair housing rights, including accessibility requirements for buildings, rights of persons with disabilities and familial status, mortgage lending and sales or rental housing. Complaints may be filed via the website online form, email, U.S. mail or fax. TWC attempts to contact the alleged discriminating party requesting a response. An optional mediation process is offered to all parties. If conciliation and mediation are not possible, TWC conducts an investigation. A Charge of Discrimination is issued if a violation is found. The Texas Attorney General's Office files lawsuits against discriminating parties. TWC maintains a Civil Rights Division to enforce the Texas Commission on Human Rights Act and the Texas Fair Housing Act. The Texas Fair Housing Act requires that TWC produce an annual report on housing discrimination (State of Texas, 2018). TWC offers training and presentations to its partners on fair housing, including a fair housing self-help library, at little or no cost (Texas Workforce Commission, 2018).

The **North Texas Fair Housing Center** (NTFHC) is a participant in HUD's Fair Housing Initiatives Program and receives federal funding to provide free fair housing services (U.S Department of Housing and Urban Development, 2018). NTFHC provides housing problem counseling, complaint investigation and training to residents of 12 North Texas counties (North Texas Fair Housing Center, 2018). Training is available for landlords, property managers, real estate agents, tenants, prospective homebuyers, city governments and nonprofit organizations on fair housing topics at no charge. NTFHC partnered with other fair housing organizations to successfully pursue a judgment against Wells Fargo Bank for allegedly providing poorer care for real estate-owned foreclosed properties in nonwhite communities than in white communities. Proceeds from the successful action are being used to fund NTFHC grants to nonprofit agencies for housing rehabilitation, housing retention in owner-occupied homes, neighborhood revitalization, accessibility modifications and down payment assistance for persons earning up to 120% of area median income. NTFHC also conducts paired testing to assess the level of unfair housing discrimination. The agency has produced one report of its testing since it was formed in 2010.

The paired testing study found that 37% of rental attempts by black testers (N=27), 33% of Hispanic attempts and 20% of attempts by families with children (N=10) were met with illegal housing discrimination (North Texas Fair Housing Center, 2011). Violations included differences in rental prices offered, information regarding availability of units, security deposit amounts, move-in specials, treatment, access to rental applications and steering buyers to certain properties and areas.

4. Additional Information

4a.   *Provide additional relevant information, if any, about fair housing enforcement, outreach capacity and resources in the jurisdiction and region.*

HISTORY
History of fair housing enforcement in the jurisdiction.

Response: On Nov. 21, 1971, the Dallas City Council adopted the Fair Housing Ordinance, Chapter 20A. This ordinance recognized protections for the original four protected classes: race, color, religion and national origin. Under this ordinance the City created an agency to review complaints of housing discrimination. At its inception, this enforcement agency was operated out of the City's Department of Housing. In February 1975, Chapter 20A was amended to include the adoption of sex (gender) as a new protected class to mirror the expansion of the federal law.

In April 1989, the city took action to enhance its fair housing program by creating a formal Fair Housing Office staffed by an administrator, two investigators and one clerk. This office was now separate and independent of the Department of Housing.

On June 13, 1990, the Fair Housing Ordinance, Chapter 20A, was amended once more to add two new protected classes: Handicapped status and Familial status [families with children under age 18]. Again this action was taken to reflect similar actions adopted at the federal level expanding the scope of the Fair Housing Act.

The City of Dallas Fair Housing Office received its certification of substantial equivalency April 24, 1995, from the U.S. Department of Housing and Urban Development.

The Dallas City Council adopted Ordinance 46 in April 2002 prohibiting unlawful discriminatory practices related to sexual orientation and gender identity. The ordinance not only addresses issues related to housing discrimination but also in employment and discrimination in places of public accommodation.

Oct. 31, 2016, the City of Dallas amended the Fair Housing Ordinance, Chapter 20A, to add "Source of Income" as an additional protected class. This new protection addresses discriminatory practices related to financial sources such as disability, Social Security, spousal

support, child support, veterans housing assistance vouchers and in some circumstances Section 8 housing vouchers.

PREVIOUS ISSUES
What previous issues have been encountered?

Response: Prior to City Council amending the Fair Housing Ordinance, Chapter 20A, to add protections for "Source of Income", this posed a serious issue. However, despite adopting this new protected class it does not go far enough to protect those most vulnerable who depend on Section 8 vouchers to secure housing. The amendment only provides protection in limited circumstances where a housing provider receives some measure of financial assistance from the City. Under these circumstances a housing provider is prohibited from denying housing to a Section 8 voucher holder. Thus, housing providers who have no financial arrangements or obligations to the City may refuse a Section 8 voucher as a legitimate source of income.

Another issue that plagued the City but has since been addressed is denying applicants for rental housing who had "criminal history & backgrounds". Some of the main actors in this practice were public housing authorities. In some instances, the execution of this "no criminal history/background" policy was applied in a manner that had a negative impact on minorities, particularly African Americans and Hispanics. In some cases the policy was used as a pretext to bar these applicants from living on the property. In 2015 HUD issued new guidelines to address this issue and provide sound guidance on how to deal with rental applicants who were burdened by this problem.

HUD stated that the policy is unlawful if it is not necessary to serve a legitimate, nondiscriminatory interest of the housing provider, or if such interest could be served by a practice that has a less discriminatory effect. Such policy or practice must be supported by a legally sufficient justification. Housing providers should look at each applicant who has a criminal background on a case-by-case basis.

AREAS FOR IMPROVEMENT
Where are the areas that can be improved?

No response.

SUCCESS
What initiatives have worked well?

Response: One initiative with a positive effect was HUD upgrading its data tracking system from TEAPOTS to HEMS. "TEAPOTS" stood for Title VIII Automated Paperless Office Tracking System. It was a comprehensive automated system used in the investigation and tracking of complaints and compliance reviews. Investigative data information was submitted through the TEAPOTS interface and stored in the database in real time. The system performed searches and generated reports by querying and retrieving data from the database.

HEMS stands for HUD Enforcement Management System. It operates much like TEAPOTS, but it has more functions and capabilities and is more user-friendly. HEMS is designed to encompass multiple enforcement systems. The upgrade improved security, modernized the platform and look, and allowed more documents to be added. HEMS replaced TEAPOTS in fall 2015.

An additional success was achieved when the FHO took a more proactive approach to resolving complaints. Instead of providing the additional option of allowing parties to resolve the complaints via outside resolution, they were being instructed to enter into conciliation. The outside resolution allowed the complainant party to just withdraw the complaint without further involvement by the FHO to protect the public interest. Outside resolutions are only allowed now under extenuating circumstances. Under the City's conciliation agreement the FHO is able to require that respondent parties attend fair housing training and submit monthly monitoring reports. This has provided the FHO with the ability to stay involved to make sure that the complained-of discriminatory activity does not continue.

PROCESS
What are pivotal points along the path of enforcement where cases can seem to bottleneck?

Response: There are a couple of situations that can create a bottleneck.

One involves respondent parties that are uncooperative and/or untimely in responding to requests. The untimeliness factor is more common when respondents are represented by attorneys. They will request extra time to respond or provide documents that have been requested by the investigator.

The second situation begins once the case is sent to the City Attorney's Office for review and determination. If several cases go up at the same time, it can create a backlog and delay the cases being returned in the normal timeframe. This is particularly true for cases that have been recommended as "cause". These take much longer and require much more work to prepare for trial.

Each situation not only creates a bottleneck but creates potential issues of "aging the case".

SOLUTIONS
What changes have been made to address previous reoccurring issues?

Response: A noted, HUD's new guidelines [2015] provided additional tools to assist people find and maintain housing. This guidance addressed four fundamental areas:

- Limited English Proficiency
- Domestic Violence and Nuisance Laws, including VAWA protections
- HUD's Equal Access Rule
- Criminal History and Background Checks

Under the HUD guidelines individuals that have experienced any acts of discrimination in trying to secure housing because of their limited English proficiency will have standing to file a fair housing complaint on the basis of "National Origin".

Under the Domestic Violence and Nuisance Laws guidance, the protections apply for all victims of domestic violence, dating violence, sexual assault and stalking, regardless of sex, gender identity or sexual orientation. This also considers protections under the Violence Against Women Act. VAWA provides advocacy, services and support for all victims of domestic violence, sexual assault, dating violence and stalking – crimes that primarily impact women, in addition to too many children and some men.

Housing providers that receive HUD funding or have loans insured by the Federal Housing Administration, as well as lenders insured by FHA, are subject to HUD's Equal Access Rule, which requires equal access to HUD programs without regard to a person's actual or perceived sexual orientation, gender identity or marital status.

Under the fourth category, Criminal History and Background Checks, housing providers that seek to limit housing based on this criteria must be supported by a legally sufficient justification and should look at each applicant who has a criminal background on a case-by-case basis.

4b.	*The program participant may also include information relevant to programs, actions or activities to promote fair housing outcomes and capacity.*

NEW INITIATIVES
What initiatives has the jurisdiction executed to further fair housing?

Response: In October 2016, the City Council amended the Fair Housing Ordinance to include "Source of Income" as a protected class. Council amended the ordinance to offer protections to people who depend solely on non-traditional income providers such as Social Security, spousal and child support, and in some instances housing vouchers. This new protected class prohibits housing providers from denying rental applicants because they utilize non-traditional sources of income to qualify for tenancy. Also, a person cannot be denied a mortgage solely because he or she uses a non-traditional source of income to qualify.

A drawback to this amendment is that landlords are only required to accept Section 8 housing vouchers if they have accepted city money for their housing project; otherwise, they can deny an applicant who has a housing voucher.

Additional Comment: The FHO has been tasked with conducting reviews of potential affordable or low-income development projects to ensure that they affirmatively further fair housing. In addition, the city adopted a comprehensive housing policy utilizing data gleaned from Market Value Analysis. MVA identifies where and how to invest limited resources that can

transform urban real estate markets into revitalized neighborhoods. Included in this policy are measures to address affordability, among other critical housing issues. A copy of this policy will be provided under separate cover.

NEW PARTNERSHIPS
What partnerships have been formed to further fair housing goals and capacity?

Response: The FHO has developed partnerships with other FHAPS, housing departments and public housing agencies in North Texas to strategize and produce a regional Assessment of Fair Housing. The group represents 21 entities composed of public housing authorities and localities in Dallas, Collin, Tarrant, Denton, Ellis and Johnson counties. It has been a positive experience and has set a foundation for relationships between the agencies to share information and work together to affirmatively further fair housing in the region.

COMMUNITTY BUY-IN
What initiatives have been well received by the community?

Response: The FHO has participated in various outreach events that have been well received by community groups and the public.

EDUCATIONAL OUTREACH
What different types of outreach activities have been conducted?

Response: The outreach events include National Night Out [in various council districts], police-sponsored "Chief on the Beat" and the Harambee Festival at Fair Park.

The FHO annually holds 60-70 outreach training events and this year conducted a Fair Housing Partners Forum to provide information to various entities and housing providers. In the past, the FHO has conducted Fair Housing Symposiums, bringing in nationally known experts on subjects related to fair housing and sustainable communities.

EVALUATION
What programs (long or short term) have proved useful in furthering fair housing goals?

Response: The "Friday Caucus" internal training sessions for investigators and staff have been beneficial. The FHO invites various professionals to speak and train on different aspects of the law or skill-building. The program started in 2015, and the sessions are quarterly.

5. Fair Housing Enforcement, Outreach Capacity and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

Compared to the previously analyzed fair housing issues, a substantially lower number of comments were gathered on contributing factors to the lack of fair housing enforcement, outreach capacity and resources. The following table displays the number of codes for each identified factor:

Table 75: Contributing factors to fair housing enforcement

Fair Housing Enforcement	10	
Resources (Staff, Budget, etc.) for Fair Housing Enforcement Agencies and Organizations	3	30%
Local Education and Fair Housing Enforcement by Private Housing Providers (Real Estate Agents, Builders, etc.)	2	20%
Local Fair Housing Enforcement by Agencies and Government	2	20%
Resolution of Violations of Fair Housing or Civil Rights Law	2	20%
State or Local Fair Housing Laws	0	0%

The intersection of fair housing enforcement and other fair housing issues has been thoroughly discussed by participants and reported under the preceding sections on contributing factors. The majority of the comments gravitated around source of income discrimination (although not protected in Texas), private discrimination and the denial of reasonable accommodation for individuals with a disability.

To gain further insight on fair housing enforcement challenges, the UTA research team extended its initial short survey to incorporate questions on the topic. Fifty-four percent of respondents estimated being somewhat informed about fair housing. The rest of the respondents were split between being "very informed" and "not informed".

Respondents also reported having faced a variety of discriminatory situations. While the responses were uniformly distributed across the options, the top three situations were (a) an agent refusing to sell, rent or show available housing (20%), (b) a person being shown mostly housing in areas or neighborhoods of minority concentration (19%), and (c) a person being denied a loan or getting a higher rate because of being a member of a certain group (19%). The top three reasons cited for the perceived discrimination were race, sex and level of income.

How informed are you about fair housing?

31, 23%

31, 23%

72, 54%

■ Very informed ■ Somewhat informed ■ Not informed
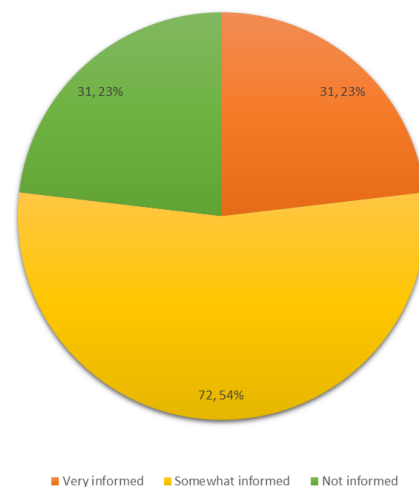
Figure 169: How informed are you about fair housing?

Discrimination in housing can occur in many ways. They include but are not limited to (select all that apply)
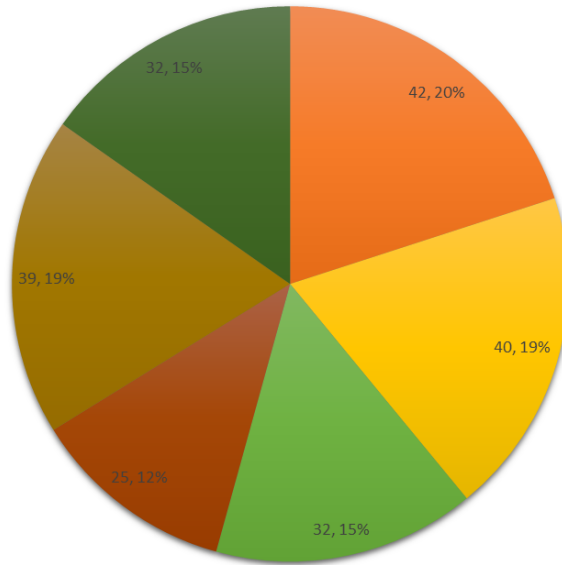
- ■ An agent refusing to sell, rent, or show available housing
- ■ A person being shown mostly housing in areas or neighborhoods of minority concentration
- ■ A landlord providing different housing services or enforcing different rules for minority tenants
- ■ A prospective tenant being told the dwelling is not appropriate for a family
- ■ A person being denied a loan or getting a higher interest rate because of being a member of a certain group
- ■ A person being denied a loan or getting a different interest rate because buying in a minority neighborhood

If you answered yes to the above question, what do you believe was the basis for the discrimination that you experienced?
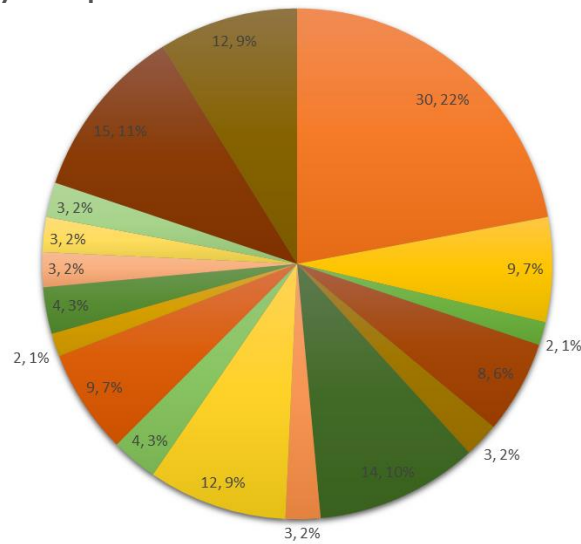
- ■ Race
- ■ Color
- ■ Religion
- ■ Sex
- ■ National Origin
- ■ Disability/Handicap
- ■ Familial Status
- ■ Age
- ■ Other
- ■ Familial Status
- ■ Ethnicity
- ■ Marital Status
- ■ Age
- ■ Limited English Profieciency
- ■ Citizenship status
- ■ Level of income
- ■ Source of income

Figure 170: Survey results on discrimination-related questions

FAIR HOUSING GOALS AND PRIORITIES

This page left blank intentionally

VI. Fair Housing Goals and Priorities

1   *For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.*

Procedure

Information gathered from public meetings, focus groups and stakeholder interviews was obtained and analyzed in a variety of ways to ascertain the overall importance of contributing factors to fair housing issues within each issue area and across issue areas. All comments were considered, but priority was placed on factors and issue areas that received repeated comments and were substantiated by local research and quantitative and GIS analysis.

Comments received from public meetings, focus groups, stakeholder or subject matter expert interviews and consultations were coded according to the list of contributing factors initially set forth in the tool and summarized using qualitative analysis software. Additional codes were created for comments relating to contributing factors not included the initial tool list. Related contributing factors were grouped to identify trends.

Contributing Factors to Fair Housing Issues

The following table displays the number of codes applied under each fair housing issue. The most comments received pertained to disparities in access to opportunity.

Table 76: Contributing factors to fair housing issues

City of Dallas, Texas	Number 1153	Percent 100%
Contributing Factors of Disparities in Access To Opportunity	**363**	**31%**
Contributing Factors of Segregation	196	17%
Contributing Factors of Disproportionate Housing Needs	195	17%
Contributing Factors of R/ECAPs	169	15%
Contributing Factors of Publicly Supported Housing Location and Occupancy	128	11%
Disability and Access Issues Contributing Factors	92	8%
Fair Housing Enforcement	10	1%

The tables below show the number of codes received for each set of contributing factors under each fair housing issue.

Table 77: Contributing factors to access to opportunity, segregation and disproportionate housing needs

Contributing Factors of Disparities in Access To Opportunity	363	
Lack of public investments in specific neighborhoods, lack of private investment, crime	88	24%
Source of income discrimination, private discrimination, lending discrimination, access to financial services, impediments to mobility	48	13%
Availability, type, frequency and reliability of public transportation	47	13%
Location of proficient schools and school assignment policies	47	13%
Lack of access to opportunity due to high housing costs, loss of affordable housing, location and type of affordable housing	41	11%
Location of employers	37	10%
Lack of local or regional cooperation	21	6%
Location of environmental health hazards	14	4%
Strengths recommendations (from surveys)	7	2%
Other, lack of information, immigration status	5	1%
Occupancy codes and restrictions	4	1%
Child care	2	1%
Land use and zoning laws	2	1%

Contributing Factors of Segregation	196	
Community Opposition, source of income discrimination, private discrimination, lending discrimination	59	30%
Loss of Affordable Housing, Displacement of Residents due to economic pressures, location and type of affordable housing	51	26%
Lack of Public Investments in Specific Neighborhoods	40	20%
Lack of regional cooperation	19	10%
Land Use and Zoning Laws	18	9%
Occupancy Codes and Restrictions	5	3%
Income	2	1%
Other	2	1%

Contributing Factors of Disproportionate Housing Needs	195	
Availability of Affordable Units in Range of Size, Loss of affordable housing, displacement due economic pressures, access to opportunity, high housing costs, rising rents	68	35%
Lack of Public Investments in Specific Neighborhoods, lack of private investments, lack of police protection or visibility in neighborhood	36	18%
Housing Problems, older homes need expensive repairs, landlords failing to maintain property	31	16%
Source of Income Discrimination, lending discrimination, eviction and criminal background	28	14%
Other, building code and regulation, lack of awareness	18	9%
Displacement of and/or Lack of Housing Support for Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking	7	4%
Land Use and Zoning Laws	7	4%
Rates of renter- and owner-occupied housing by Race/Ethnicity	0	0%

Table 78: Contributing factors to R/ECAPs, issues related to publicly supported housing, and disability and access to opportunity

Contributing Factors of R/ECAPs	169	
Lack of Public Investments in Specific Neighborhoods, lack of private investments, lack of community revitalization strategies, deteriorated and abandoned properties	65	38%
Location and Type of Affordable Housing, loss of affordable housing, displacement of residents due to economic pressure	45	27%
Source of Income Discrimination, community opposition, private discrimination	29	17%
Lack of Local or Regional Cooperation	10	6%
Land Use and Zoning Laws	9	5%
Occupancy Codes and Restrictions	7	4%
Other, Language Barrier	4	2%

Contributing Factors of Publicly Supported Housing Location and Occupancy	128	
Siting Selection Policies, Practices and Decisions for Publicly Supported Housing, Including Discretionary Aspects of Qualified Allocation Plans and Other Programs, community opposition, impediments to mobility, income discrimination	35	27%
Lack of Access to Opportunity Due to High Housing Costs, loss of affordable housing, displacement due to economic pressures	28	22%
Quality of Affordable Housing Information Programs	14	11%
Lack of Public Investment in Specific Neighborhoods, lack of private investment	13	10%
Lack of Local or Regional Cooperation	11	9%
Admissions and Occupancy Policies and Procedures, Including Preferences in Publicly Supported Housing	7	5%
Land Use and Zoning Laws	7	5%
Displacement of and/or Lack of Housing Support for Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking	5	4%
Lack of meaningful language access	4	3%
Occupancy Codes and Restrictions	2	2%
Other	2	2%
Crime/Security	0	0%

Disability and Access Issues Contributing Factors	92	
Lack of Affordable, Integrated Housing, accessible housing, in-home services and community service for Individuals Who Need Supportive Services in a range of sizes	24	26%
Access to Transportation for Persons with Disabilities	12	13%
Loss of Affordable Housing, lack of access to opportunity due to high housing costs	9	10%
State/Local Laws, Policies, Practices that Discourage Individuals W/Disabilities Living in Apartments, Family Homes, Supportive Housing, Shared Housing and Other Integrated Settings, access to publicly supported housing	9	10%
Regulatory Barriers to Providing Housing and Supportive Services for Persons With Disabilities	8	9%
Other, language barrier	6	
Inaccessible Government Facilities or Services, inaccessible public or private infrastructure	6	7%
Location of Accessible Housing	5	5%
Lack of Assistance for Housing Accessibility Modifications	4	4%
Access for Persons with Disabilities to Proficient Schools	3	3%
Lack of local or regional cooperation	2	2%
Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing	2	2%
Occupancy Codes and Restrictions	1	1%
Land use and zoning laws	0	0%
Source of Income Discrimination, lending discrimination	0	0%

Table 79: Contributing factors to fair housing enforcement

Fair Housing Enforcement	10	
Resources (Staff, Budget, etc.) for Fair Housing Enforcement Agencies and Organizations	3	30%
Local Education and Fair Housing Enforcement by Private Housing Providers (Real Estate Agents, Builders, etc.)	2	20%
Local Fair Housing Enforcement by Agencies and Government	2	20%
Resolution of Violations of Fair Housing or Civil Rights Law	2	20%
State or Local Fair Housing Laws	0	0%

2	*For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved and indicate the timeframe for achievement.*

Vetting proposed Fair Housing Goals:

Based on the data analyzed (quantitative data, policy analysis, best practices) and the public input gathered throughout the process (meeting, consultation, focus group, surveys), the UTA research team formulated a preliminary set of goals and strategies to address the identified fair housing challenges.

The team presented the proposed goals to the community at a second round of public meetings. Participants voted on the importance for each goal and provided comments on how to improve the goals.

The following boards were used to collect votes and comments from participants. Illustrative strategies accompanied the goals to help participants reflect on the suitability of each goal and also recommend potential strategies.

These goals and a broader list of potential strategies were discussed and presented to the NTRHA Technical Advisory Board, Community Development Commission and other organizations that were consulted throughout the process, such as Legal Aid of Northwest Texas and National Low Income Housing Coalition.

The following tables show the number of votes received for each goal and the assessed level of importance of each goal. Close to 200 votes were registered per goal, and all goals were considered of high importance.

Table 80: Fair housing goals initially proposed

Goal A	Increase access to affordable housing in high-opportunity areas
Goal B	Increase supply and prevent loss of affordable housing units
Goal C	Increase supply of accessible, affordable housing for persons with disabilities
Goal D	Make investments in targeted neighborhoods to increase opportunity
Goal E	Increase supports and services for residents of publicly supported housing
Goal F	Increase access to information and resources on fair and affordable housing

Table 81: Voting results on proposed fair housing goals

Level (%)	Goal A	Goal B	Goal C	Goal D	Goal E	Goal F
High	89%	86%	80%	87%	81%	79%
Medium	6%	12%	18%	12%	15%	18%
Low	5%	2%	2%	1%	4%	3%
Not Important	1%	1%	0%	0%	0%	1%
Level (Count)	**Goal A**	**Goal B**	**Goal C**	**Goal D**	**Goal E**	**Goal F**
High	168	161	151	166	155	148
Medium	11	22	34	23	28	33
Low	9	3	4	1	8	5
Not	1	2	0	0	0	1
Total Votes	189	188	189	190	191	187

Prioritize Goal

Goal A: Increase access to affordable housing in high opportunity areas

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Adopt a comprehensive and balanced housing policy and establish Housing Trust Fund to support aggressive affordable housing strategies
- Provide mobility counseling and search assistance to help families make informed housing choices based on data and other information on neighborhood opportunity.
- Administer Housing Choice Voucher Program regionally: including mobility counseling, and housing retention support (support participants at all stages – pre- moving; moving; post-move support)
- Prioritize the Low-Income Housing Tax Credit and Project-based Vouchers developments in high-opportunity areas
- Form partnerships to provide affordable transportation options to connect residents to employment and to regional destinations

Prioritize Goals

Goal B: Increase supply and prevent loss of affordable housing units

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Promote reforms to current zoning regulations including the development of voluntary inclusionary zoning policies to support the production of affordable housing in high opportunity neighborhoods.
- Amend local zoning codes to incentivize the construction of accessible units in higher density, mixed-use locations and to allow for a broader range of affordable housing options for older adults and protected classes, including accessory dwellings and co-housing.
- Develop programs to protect current homeowners and affordable rental units from rapidly rising valuation and taxes in gentrifying neighborhoods

Prioritize Goals

Goal C: Increase supply of accessible, affordable housing for persons with disabilities

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Form partnership to deliver a training session on fair housing accessibility issues to local code enforcement officials, design professionals and property owners
- Adopt a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request
- Expand the use of PBVs for development of housing for persons with disabilities including development of single family homes for shared housing in coordination with Medicaid supportive service programs (Home and Community-based Services)

Prioritize Goals

Goal D: Make investments in targeted neighborhoods to increase opportunity

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Incorporate community knowledge of gaps in service and potential solutions in underserved neighborhoods to prioritize City development incentives that address infrastructure upgrades, reduction of blight and commercial development.
- Focus on identifying and prioritizing needed public improvements that will enhance existing transportation systems (transit and roadway) that contribute to economic opportunity for area disadvantaged persons and minority populations
- Revise economic development policies and incentives to prioritize efforts to attract and support businesses that provide well-paying jobs in lower opportunity and Racially/Ethnically Concentrated Areas of Poverty

Prioritize Goals

Goal E: Increase supports and services for residents of publicly supported housing

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Annually gather feedback from residents on the quality of the management of publicly supported housing units and/or landlord-related issues
- Partner with supportive agencies and nonprofits to provide on-site support to residents (counseling, child care, transportation…)
- Promote services, including career exploration, mentoring, peer-programs, and experiential learning to enable middle and high school students in publicly supported housing to better prepare for careers

Prioritize Goals

Goal F: Increase access to information and resources on fair and affordable housing

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Expand fair housing outreach, education, and training for youth and other targeted populations through collaborative strategies
- Develop a robust plan to assess banks' performance related to the Community Reinvestment Act (CRA).
- Provide support (letters, endorsements, financial etc.) for local fair housing groups' education and/or local fair housing groups' fundraising efforts.
- Establish ongoing community meetings with financial institutions, insurance companies, landlords, realtors, and foundations in order to enhance their knowledge and support for fair housing goals

Additional Goals

What other goal(s) would you like your city and/or housing agency to pursue?

Figure 171: Voting boards used during public meetings

Finalized Fair Housing Goals and Priorities

What should this include?
(source: Assessment of Fair Housing Tool for Local Governments-Instructions, HUD 2017)

- Set one or more **goals to address each fair housing** issue with significant contributing factors. For each goal, program participants must identify one or more contributing factors that the goal is designed to address, describe how the goal relates to overcoming the identified contributing factor(s) and related fair housing issue, and **identify metrics and milestones** for determining what fair housing results will be achieved

- Program participants should note that the **strategies and actions and the specifics of funding decisions**, subject to the consolidated plan, PHA plan or other applicable planning process, **are not required to be in the AFH**. However, the goals set by program participants will factor into these planning processes. These **goals will form the basis for strategies and actions in subsequent planning documents.**

- While contributing factors **may be outside the ability of program participants** to directly control or influence, (…) there still may be policy options or goals that program participants should identify, while recognizing the limitations involved.

Steps taken to finalize goals

Based on the feedback received throughout public outreach activities, the initial goals were enhanced.

Table 82: Initial and final fair housing goals proposed

	Initial Goals
Goal A	Increase access to affordable housing in high-opportunity areas
Goal B	Increase supply and prevent loss of affordable housing units
Goal C	Increase supply of accessible, affordable housing for persons with disabilities
Goal D	Make investments in targeted neighborhoods to increase opportunity
Goal E	Increase supports and services for residents of publicly supported housing
Goal F	Increase access to information and resources on fair and affordable housing
	Final Goals
Goal A	Increase access to affordable housing in high-opportunity areas
Goal B	Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas
Goal C	Increase supply of accessible, affordable housing for persons with disabilities
Goal D	Make investments in targeted and segregated neighborhoods to increase opportunity while protecting residents from displacement
Goal E	Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing
Goal F	Increase access to information and resources on fair and affordable housing

To enhance the meaningfulness of the exercise of deriving data-driven fair housing goals and to facilitate their implementation, the UTA researchers formulated a set of potential strategies.

Table 83: Fair Housing Goal A

Goal A	Contributing Factors	Fair Housing Issues	Metrics, Milestones and Timeframe for Achievement	Responsible
Increase access to affordable housing in high opportunity areas	Location and type of affordable housing, lack of access to opportunity due to high housing costs, loss of affordable housing, source of income discrimination, availability of affordable units in range of sizes	Segregation, R/ECAPs, disproportionate housing needs, disparities in access to opportunity, publicly supported housing	• Establish Housing Trust Fund to support aggressive affordable housing development and deep income targeting strategies in high opportunity areas and non-segregated areas • File amicus curae brief in support of lawsuit challenging the Texas State law prohibiting municipal source of income protection ordinances • Provide mobility counseling and search assistance to help families make informed housing choices based on data and other information on neighborhood opportunity • Create outreach programs and provide financial/programmatic incentives for landlords in high opportunity areas o Establish and fund a set of incentives based on successful best practices including consideration of risk pools, paid deposits and application fees, double deposits, single point of contact for problems • Form partnerships to provide affordable transportation options to connected residents and HUD-assisted households to employment and to regional destinations	City of Dallas, Dallas Housing Authority, Dallas County Housing Authority
Discussion: Increasing access to higher opportunity areas deconcentrates poverty, combat segregation and foster upward mobility. Pathways to opportunities and self-sufficiency appear to be greatly weakened by systemic barriers (i.e. source of income discrimination) and a persistent geography of inequity. The pursuits of deep income targeting strategies/programs, and the provision of incentives are intended to remove such barriers.				

...

Table 84: Fair Housing Goal B

Goal B	Contributing Factors	Fair Housing Issues	Metrics, Milestones and Timeframe for Achievement	Responsible
Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas	Location and type of affordable housing, community opposition, housing problems	Disproportionate housing needs, segregation, R/ECAPs	• Promote reforms to current zoning regulations including the development of voluntary inclusionary zoning policies connected to deep income targeting strategies in all new or renovated housing projects in high-opportunity areas • Develop strategies to retain expiring LIHTC projects as affordable housing • Proactively lock-in affordable housing in gentrifying areas (i.e. LITHC developments, TIFs). • Draw from the Montgomery County's model to develop right of first refusal program for Housing Authorities to purchase buildings being sold for the purpose of conversion to condominium. • Develop programs to protect current homeowners and affordable rental units from rapidly rising valuation and taxes in gentrifying neighborhoods (Market Segmentation analysis for property appraisal: Travis County model) • Develop strategies to monitor and support existing affordable housing in gentrifying communities, including addressing problems arising from rapidly increasing property valuations and taxes (i.e. Neighborhood Change Index) • Consider expanded home repair programs to include single and multifamily housing, owner-occupied and rental property • Continue the development of mixed-income housing that preserves and increases the quantity of high-quality affordable housing • Expand special tax districts (TIFs, etc.) that provide funds for affordable housing development	City of Dallas, Dallas Housing Authority, Dallas County Housing Authority, Dallas Central Appraisal District

Discussion: The need for affordable housing in Dallas and the DFW region is acutely growing while affordable housing choices seem to be shrinking. Increasing the supply of affordable housing throughout the community must be pursued in a way that does not further segregate and concentrate poverty, but rather foster inclusive, mixed-income communities. The supply of affordable housing is also effected by the loss of affordable housing (i.e. gentrification, demolition, conversion to higher-end units). Proactive measures can be taken to protect residents and mitigate seemingly-irrepressible market pressures, by notably "locking-in" affordability as markets transition but also by developing property valuation processes accounting for "markets within markets" (segmentation approach). A viable and complementary route —already pursued, would consists of expanding financial resources for home repairs.

Table 85: Fair Housing Goal C

Goal C	Contributing Factors	Fair Housing Issues	Metrics, Milestones and Timeframe for Achievement	Responsible
Increase supply of accessible, affordable housing for persons with disabilities	• Lack of affordable integrated housing for persons needing supportive services • Lack of affordable, accessible housing for persons with disabilities • Lack of affordable in-home or community based supportive services • State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings	Disabilities and accessibility	• Amend local zoning codes to incentivize the construction of accessible units in higher density, mixed-use locations and to allow for a broader range of affordable housing options for older adults and protected classes, including accessory dwellings and cohousing. • Adopt a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request. • Expand the use of PBVs for development of housing for persons with disabilities including development of single family homes for shared housing in coordination with Medicaid supportive service programs (Home and Community-based Services). • Form partnership to deliver a training session on fair housing accessibility issues to local code enforcement officials, design professionals and property owners. • Develop programs to promote universal design (for housing accessibility) in new construction and renovation • Continue to survey public infrastructure (sidewalks, crosswalks, business entrances, etc.) for accessibility and allocate appropriate funds to bring public areas up to codes	City of Dallas, Dallas Housing Authority, Dallas County Housing Authority

Discussion: Project-based vouchers can be targeted to provide accessible housing opportunities for persons with disabilities that work together with state Medicaid long term care programs. City-wide programs that incentivize and encourage universal design expand the total pool of accessible housing and create housing that supports the entire human lifecycle. City-wide programs ensure that accessible housing is not segregated in higher poverty communities. City programs to address infrastructure increase access to opportunity (transportation, etc.) for persons with disabilities in all communities

Table 86: Fair Housing Goal D

Goal D	Contributing Factors	Fair Housing Issues	Metrics, Milestones and Timeframe for Achievement	Responsible
Make investments in targeted and segregated neighborhoods to increase opportunity while protecting residents from displacement	Lack of public or private investments in specific neighborhoods, including services or amenities Lack of revitalization strategies	Access to Opportunity, Segregation, R/ECAPs	• Ensure meaningful community engagement in identifying alternate uses for vacant and derelict land to support food access, recreation and green space in underserved communities. • Revise/expand boundaries of focus areas designated in urban development-related policies and programs to target racially segregated census tracts, R/ECAPs, and/or most distressed real estate markets. • Advocate for the participation of housing policymakers/PHAs in the development of the Transportation Improvement Program as well as Title VI and Environmental Justice analyses. • Revise economic development policies and incentives to prioritize efforts to attract and support businesses that provide well-paying jobs in lower opportunity and R/ECAP areas • Collaborate with transportation agencies to create innovative programs providing affordable transportation options in lower opportunity areas, and R/ECAPs and to HUD-assisted families • Adopt racial/ethnic impact statement	City of Dallas, Dallas Housing Authority, Dallas County Housing Authority, Dallas Area Rapid Transit, North Central Texas Council of Governments

Discussion: Stark patterns of neighborhood inequities characterize Dallas. Addressing this inequitable landscape of opportunity requires coordinated and geographically-targeted actions across City departments and agencies. In 2018, the City of Dallas created the Office of Equity and Human Rights, which intends to not only institutionalize the equity-focus adopted by the City, but also effectively place equity at the forefront of city-led actions and initiatives across many departments (i.e. transportation, housing, neighborhood services…).

Table 87: Fair Housing Goal E

Goal E	Contributing Factors	Fair Housing Issues	Metrics, Milestones and Timeframe for Achievement	Responsible
Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing	Lack of public or private investments in specific neighborhoods, including services or amenities Lack of revitalization strategies	Disproportionate housing needs, disparities in access to opportunity, R/ECAPs Segregation Publicly Supported Housing	• Partner with supportive agencies and nonprofits to provide on-site support to residents (counseling, child care, transportation). • Annually gather feedback from residents on the quality of the management of publicly supported housing units and/or landlord-related issues. • Foster economic self-sufficiency by supporting jobs skills workshops to assist PHA residents to obtain and retain jobs and/or support agencies providing job training programs to PHA-residents. • Evaluate economic viability of subsidized households leveraging HUD form 50058 to identify needs and provide adequate assistance/support/referral. • Expand efforts toward coordination among public housing authorities with residents at common properties, including inspections, monitoring and problem solving • Expand fair housing outreach, education, and training for residents and individuals on waiting-list • Create shared information program between City (Neighborhood Services, etc.) and housing authority to facilitate resolution of potential problems where publicly assisted housing is located, including code compliance complaints, crime data and public infrastructure impact	City of Dallas, Dallas Housing Authority, Dallas County Housing Authority
Discussion: Community investments can increase access to opportunity (jobs, services, recreation, etc.) in higher poverty areas with higher levels of ethnic segregation. Local research demonstrates that the condition (maintenance, management) of publicly assisted and low-income housing is a significant driver of community attitudes. Well-managed and well-maintained properties improve public opinion and may effectively reduce some community opposition. Importantly, the provision of support for residents of publicly supported housing also include the locational characteristics in which neighborhoods are located, ipso facto, the pursuit of this goal is indissociable from sitting selection decisions and policies.				

Table 88: Fair Housing Goal F

Goal F	Contributing Factors	Fair Housing Issues	Metrics, Milestones and Timeframe for Achievement	Responsible
Increase access to information and resources on fair and affordable housing	Local education and fair housing enforcement by private housing provider (real estate agents, builders, etc.) Quality of affordable housing information programs	Fair Housing Enforcement Publicly supported housing	• Support Tenant Rights Workshops to educate low-income renters about Fair Housing rights. • Provide support (letters, endorsements, financial etc.) for local fair housing groups' education and/or local fair housing groups' fundraising efforts. • Establish ongoing community meetings with financial institutions, insurance companies, landlords, realtors, and foundations in order to enhance their knowledge and support for fair housing goals. • Develop a robust plan to assess banks' performance related to the Community Reinvestment Act (CRA). • Expand fair housing outreach, education, and training for youth and other targeted populations through collaborative strategies.	Dallas Housing Authority, Dallas County Housing Authority, Federal Reserve Bank, Non-Profits, Advocacy Groups

Discussion: The lack of awareness about the fair housing resources available/tenants' rights is very likely to worsen housing problems and fuel predatory practices (i.e. wrongful evictions, landlords and builders to take advantage of uninformed individuals). Active dissemination and outreach, as well as effective fair housing enforcement are pivotal to affirmatively further fair housing.

Table 89: Metrics to track and implement fair housing goals

GOALS	METRICS
Increase access to affordable housing in high-opportunity areas	• Change in percent of vouchers used in high-opportunity areas • Increase in number of graduates from self-sufficiency programs • Increase in number of landlords participating in high-opportunity areas and high SAFMR ZIP codes • Increase in affordable housing within 1.5 miles of quality schools • Increase in affordable housing within 5 miles of quality employment • Percent of households that successfully secure housing in high-opportunity areas through mobility counseling
Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas	• Increase in relative and absolute housing units available for low-income households (LIHTC + PHA + low-rent market) • Percent decrease in housing gap (the difference between affordable housing need and housing supply) by year • Percent increase in jurisdictions at or above the calculated regional target of affordable housing units • Increase in number of landlords accepting HCVs • Percent of households not cost burdened (30% or less of income spent on housing/utilities or other relevant measures) • Increase in diversity of housing types accepting HCVs (duplex, townhome, single-family home, etc.); create and maintain database of housing types • Percent increase in regional share • Rate of vouchers returned for inability to secure a unit, recorded by reason (none available, disability, etc.) • Monitor sub-market rate change (quarterly/annually) using analytical tool such as MPF Research or RealPage
Increase supply of accessible, affordable housing for persons with disabilities	• Number of new units produced that are fully accessible • Number of units converted to meet accessibility requirements • Increase in number of designated accessible units • Increase in LIHTC accessible units • Increase in number of persons with disabilities in publicly supported housing occupying accessible/converted units • Number of program participants with documented disabilities who leave the wait list due to securing a home • Number of landlords who accept HCV with disability • Number of accessible units in publicly supported housing (add line to checklist)
Make investments in targeted and segregated neighborhoods to increase opportunity	• Percent increase in annual amount invested in infrastructure projects (i.e. sidewalks, roadways, lighting, piping, etc.) • Percent increase in diverse banking services (i.e. addition of credit unions and state, local, national, international banks) • Increase in diverse grocery options, restaurant options, business, retail in R/ECAPs • Increase in small business loans or grants to lower income neighborhoods and R/ECAPs • Percent increase in local neighborhood improvement grants • Decrease in number of R/ECAPs
Increase supports and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing	• Number of calls for service to police and fire, including number of responses • Performance on City inspections (multifamily, etc.) • Percent increase of passing inspections by code enforcement • Decrease in HA turnaround on meetings, inspections, phone calls, payments for landlords and streamlined recertification • Percent change in complaints about landlord response to tenants • Percent of landlords retained, year to year
Increase access to information and resources on fair and affordable housing	• Annual survey to assess reach of information or resources invested in outreach • Increase in diverse evidence-based outreach efforts • Percent increase in ZIP codes reached at fair and affordable housing outreach activities (use surveys or sign-in sheets with ZIP code entry lines) • Percent increase in online resources and outreach, certifications, etc.

Bibliography

AARP. (2017, January 24). Intolerable care: A snapshot of the Texas nursing home quality crisis. Retrieved from AARP: https://s18672.pcdn.co/wp-content/uploads/2017/01/INTOLERABLE-CARE.pdf

bcWORKSHOP (2018). State of Dallas Housing Report. Retrieved from http://www.bcworkshop.org/posts/2018-state-of-dallas-housing-report

Bo'sher, L., Chan, S., Gould Ellen, I., Karfunkel, B., & Liao, H.-L. (2015, May 26). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey (AHS). Retrieved from HUDUSER: https://www.huduser.gov/portal/publications/mdrt/accessibility-america-housingStock.html

Byrne, T. M. (2013). New perspectives on community-level determinants of homelessness. Journal of Urban Affairs, 607-625.

Center for Neighborhood Technology. (2017). AllTransit Rankings. Retrieved from AllTransit: http://alltransit.cnt.org/rankings

Center for Public Policy Priorities. (2017). Dallas Economic Assessment. Retrieved from https://www.cftexas.org/dallas-economic-opportunity-assessment

Chetty, R., & Hendren, N. (2017). The impact of neighborhoods on intergenerational mobility II: county-level estimates. Retrieved from Harvard University: https://scholar.harvard.edu/hendren/publications/impact-neighborhoods-intergenerational-mobility-ii-county-level-estimates

Chetty, R., Hendren, N., Kline, P., & Saez, E. (2014). Where is the land of opportunity? The geography of intergenerational mobility in the United States. Quarterly Journal of Economics, 1553-1623. Retrieved from www.equality-of-opportunity.org

Cohen-Miller, R. (2017, August 3). Attorney, Disability Rights Texas. (F. A. Brewer, Interviewer)

Comfort, P. (2017, September 25). 4 instruments to manage paratransit costs. Retrieved from Trapeze: http://www.trapezegroup.com/blog-entry/4-instruments-to-manage-paratransit-costs#

Community for Permanent Supported Housing. (2018, February 18). North Texas regional fair housing assessment meetings. Retrieved from CPSH: http://fortworthtexas.gov/fairhousing/afh/

Community for Permanent Supported Housing. (2018, March 10). Project Independence. Retrieved from CPSH: https://www.txcpsh.org/project-independence/

Community for Permanent Supported Housing. (March 2018, March 10). Neighborhood Homes Project. Retrieved from CPSH: https://www.txcpsh.org/neighborhood-homes

Cooper, E., Knott, L., Schaak, G., Sloane, L., & Zovistoski, A. (2015). Priced out in 2014. The Housing Crisis for People with Disabilities, Technical Assistance Collaborative, Inc., Consortium for Citizens with Disabilities, Housing Task Force.

Costar Group. (2018, June 2). Fort Worth Apartments for Rent with Wheelchair Access. Retrieved from Apartments.com: https://www.apartments.com/fort-worth-tx/wheelchair-accessible/?bb=v-4lkjms3J92yxypP

Crane, R. &. (2008). People or place? Revisiting the who versus the where of urban development. Lincoln Institute. Retrieved from http://www.lincolninst.edu/pubs/1403_People-or-Place-

Culhane, D. P. (1996). Where the homeless come from: A study of the prior address distribution of families admitted to public shelters in New York City and Philadelphia. Housing Policy Debate, 7(2), 327-365.

Culhane, D. P. (2008). Rearranging the deck chairs or reallocating the lifeboats? Journal of the American Planning Association, 74(1), 111-121.

Culhane, D. P., Metraux, S., Byrne, T., Stino, M., & Bainbridge, J. (2013). The age structure of contemporary homelessness: Evidence and implications for public policy. Analyses of Social Issues and Public Policy, 13(1), 228-244

Dallas Housing Authority. (2012). Walker Settlement. Retrieved February 11, 2018, from Dallas Housing Authority: http://www.dhadal.com/about-DHA/2/Walker%20Settlement

Daniel & Beshara, P.C. (2018, February 12). walker v. hud. Retrieved from Daniel & Beshara, P.C.: https://www.danielbesharalawfirm.com/walker-v-hud/

Debra Walker, et al., v. U.S. Department of Housing and Urban Development, et al., 3:85-CV-1210-R (United States District Court for the Northern District of Texas Dallas Division April 26, 2001). Retrieved from squarespace.

Down Home Ranch. (2018, March 4). Residency at Down Home Ranch. Retrieved from Down Home Ranch: http://www.downhomeranch.org/our-programs/residency/

Dupler, P. (2017, September 19). Senior Planner, Fort Worth Transportation Authority. (F. Brewer, Interviewer)

Early, D. W. (2004). The determinants of homelessness and the targeting of housing assistance. Journal of Urban Economics, 55(1), 195-214.

Federal Financial Institutions Examination Council. (2015). A Guide to CRA data collection and reporting. Retrieved from FFIEC: https://www.ffiec.gov/cra/pdf/2015_CRA_Guide.pdf

Federal Financial Institutions Examination Council. (2016). Home Mortgage Disclosure Act. Retrieved from FFIEC: https://www.ffiec.gov/hmda/default.htm

Fischer, W. (2015). Neighborhood-based subsidy caps can make housing vouchers more efficient and effective. Center on Budget and Policy Priorities. Accessed on March, 3, 2016.

Garnett, S. (2017, October 24). Chief Executive Officer. (F. A. Brewer, Interviewer)

Ginny McKay Consulting. (2017). Crushing the Workforce. Austin: Coalition of Texans with Disabilities.

Gooden, D. (2017, September 25). Chair, Fort Worth Mayor's Committee on Persons with Disabilities. (C. o. Group, Interviewer)

Hearst Newspapers LLC. (2007, July 23). Trustee appointed for Celina nursing home. Retrieved from mrt: https://www.mrt.com/news/article/Trustee-appointed-for-Celina-nursing-home-7656637.php

Hill, D., & Brewer, F. (2014). A better way: In home care for Texans who are ventilator dependent. Fort Worth.

Hopper, L. (2002, July 8). Texas lacks resources for ventilator patients. Retrieved from Chron: https://www.chron.com/news/health/article/Texas-lacks-resources-for-ventilator-patients-2075469.php

Huynh, T., & Kent, L. (2015). In Greater Dallas Area, Segregation by Income and Race. Pew Research Center.

Inclusive Communities Project. (2013). Frequently Asked Questions. Retrieved from Opportunity Moves: http://opportunitymoves.org/faq

Inclusive Communities Project. (2013). Home. Retrieved from Opportunity Moves: http://opportunitymoves.org/

Inclusive Communities Project. (2017, July). Survey of Multi-Family Properties. Retrieved from Inclusive Communities Project: https://www.inclusivecommunities.net/wp-content/uploads/2017/07/Survey-of-Multi-Family-properties-Analysis-CDDR-6-8-17-w-cover.pdf

Inclusive Communities Project. (2018, May 3). Mobility Assistance Program. Retrieved from ICP: inclusive communities project: http://www.inclusivecommunities.net/moving.php

Kitchens, B. (2017, May 2). Where are LIHTC units most scarce? MPF research examines metro-level availability. Retrieved from Real Page: https://www.realpage.com/analytics/lihtc-units-most-scarce-metro-level/

LeBlanc, A. J., Tonner, M. C., & Harrington, C. (2001). State Medicaid Programs Offering Personal Care Services. Health Care Financing Review, 155-173.

Lesley, B. A. (2010). Money does matter! Investing in Texas children and our future. Retrieved from Equity Center: http://equitycenter.org/wp-content/uploads/2014/10/moneymatters.pdf

Lichter, D. T., Parisi, D., & Taquino, M. C. (2015). Toward a New Macro-Segregation? Decomposing segregation within and between metropolitan cities and suburbs. American Sociological Review, 843-873.

Marbridge Foundation. (2018, March 7). Live here - admissions process. Retrieved from Marbridge: A whole new life: https://www.marbridge.org/live-here/live-here-admissions-process/

MPF Research. (2017). Apartment market report: Dallas/Fort Worth. RealPage, Inc.

National Low Income Housing Coalition. (2018) Out of Reach 2018

North Central Texas Council of Governments. (2018). North Central Texas Major Employers. Retrieved from RDC NCTCOG: http://nctcoggis.maps.arcgis.com/apps/SummaryViewer/index.html?appid=575a1895697a4f5b84b9bbeca6cb63f6

North Central Texas Council of Governments. (2018, February 3/3/2018). Housing Resources.

Novogradac & Company LLP. (2017, July). Novogradac & Company LLP. Retrieved from Affordable Housing Resource Center: https://www.novoco.com/resource-centers/affordable-housing-tax-credits/data-tools/lihtc-mapping-tool

Novogradac & Company LLP. (2018). Rent & Income limit calculator. Retrieved from Novogradac & Company LLP: https://ric.novoco.com/tenant/rentincome/calculator/z4.jsp

Office of the Comptroller of the Currency. (2014). Community Reinvestment Act fact sheet. Retrieved from Office of the Comptroller of the Currency: https://www.occ.treas.gov/topics/compliance-bsa/cra/index-cra.html

Office of the Comptroller of the Currency. (2018). Community Reinvestment Act (CRA). Retrieved from Office of the Comptroller of the Currency: https://www.occ.treas.gov/topics/compliance-bsa/cra/index-cra.html

Oxford House, Inc. (2018, March 6). Directory of Oxford Houses. Retrieved from Oxford House: https://www.oxfordhouse.org/userfiles/file/house-directory.php

Oxford House, Inc. (2018, March 6). The Purpose and structure of Oxford House. Retrieved from Oxford House: https://www.oxfordhouse.org/userfiles/file/purpose_and_structure.php

Pendall, R. (2000). Local land use regulation and the chain of exclusion. Journal of the American Planning Association, 66(2), 125-142.

Rothstein, R. (2017). The color of law. New York: Liveright.

Rukmana. (2010). Gender differences in the residential origins of the homeless: Identification of areas with high risk of homelessness. Planning Practice and Research, 25(1).

Social Security. (2018). Understanding supplemental Security Income SSI Income -- 2018 Edition. Retrieved from Social Security: https://www.ssa.gov/ssi/text-income-ussi.htm

Sociocultural Research Consultants, LLC. (2018). Dedoose Version 8.0.35, web application for managing, analyzing and presenting qualitative and mixed method research data. Retrieved from Dedoose.com: https://app.dedoose.com/App/?Version=8.0.35

Tegeler, P., & Hilton, M. (2017). Disrupting the reciprocal relationship between housing and school segregation.

Texas Council for Developmental Disabilities. (2017, February). State Supported Living Centers: Consolidate state supported living centers and improve community services for Texans with IDD. Retrieved from TCDD: http://www.tcdd.texas.gov/wp-content/uploads/2017/04/SSLCs-Fact-Sheet.pdf

Texas Council for Developmental Disabilities. (2018, March 4). Employment assistance and supported employment versus day habilitation. Retrieved from Texas Council for Developmental Disabilities: http://www.tcdd.texas.gov/resources/fact-sheets-issue-briefs/employment-supported-assistance-vs-day-habilitation/

Texas Department of Housing and Community Affairs. (2017, October). Housing Tax Credit Property Inventory . Retrieved from Texas Department of Housing and Community Affairs: http://www.tdhca.state.tx.us/multifamily/htc/docs/HTCPropertyInventory.xls

Texas Department of Housing and Community Affairs. (2018, March 4). Project Access Program. Retrieved from Texas Department of Housing and Community Affairs: https://hhs.texas.gov/about-hhs/records-statistics/interest-list-reduction

Texas Department of Housing and Community Affairs. (2018, May 31). Housing Tax Credit Basics - FAQs. Retrieved from Texas Department of Housing and Community Affairs: https://www.tdhca.state.tx.us/multifamily/faqs-htc-basics.htm

Texas Education Agency. (2016). Glossary: 2015-16 Texas Academic performance report. Retrieved from TEA: https://rptsvr1.tea.texas.gov/perfreport/tapr/2016/glossary.pdf

Texas Education Agency. (2016). Snapshot 2016. Retrieved from TEA: https://rptsvr1.tea.texas.gov/perfreport/snapshot/2016/index.html

Texas Education Agency. (2017). 2016-2017 Economically Disadvantaged Students: Statewide totals by district. Retrieved from TEA: Texas Education Agency: https://rptsvr1.tea.texas.gov/cgi/sas/broker

Texas Education Agency. (2017). 2016-2017 Texas Academic Performance Report. Retrieved from TEA: https://rptsvr1.tea.texas.gov/perfreport/tapr/2017/index.html

Texas Education Agency. (2018, February 15). Revenue Sources and Expenditures Categories Bar Charts. Retrieved from TEA: Texas Education Agency: https://rptsvr1.tea.texas.gov/school.finance/forecasting/financial_reports/1516_stacked_bar_charts.html

Texas Education Agency. (2018, May 7). Public Education Grant (PEG) FAQ. Retrieved from TEA: https://tea.texas.gov/Student_Testing_and_Accountability/Accountability/State_Accountability/Performance_Reporting/Public_Education_Grant_(PEG)_FAQ/

Texas Health and Human Services Commission. (2017, December). Medicaid Occupancy Reports. Retrieved from Texas Health Human Services: https://hhs.texas.gov/sites/default/files//documents/doing-business-with-hhs/providers/long-term-care/nf/occupancy/2017/Occupancy_December_17.pdf

Texas Health and Human Services. (2018, January). Interest list reduction. Retrieved from Texas Health and Human Services: https://hhs.texas.gov/about-hhs/records-statistics/interest-list-reduction

Texas Health and Human Services. (2018, June 2). Intermediate Care Facilities (ICF/IID. Retrieved from Texas Health and Human Services: https://hhs.texas.gov/doing-business-hhs/provider-portals/long-term-care-providers/intermediate-care-facilities-icfiid

Texas Health and Human Services. (2018, March 4). Long Term Care Provider Search. Retrieved from Texas Health and Human Services: https://apps.hhs.texas.gov/LTCSearch/

Texas Health and Human Services. (2018, March 4). Residential Options. Retrieved from Texas Health and Human Services: https://hhs.texas.gov/services/disability/intellectual-or-developmental-disabilities-idd-long-term-care

Texas Health and Human Services. (2018, March 7). Home and Community-based Services (HCS). Retrieved from Texas Health and Human Services: https://hhs.texas.gov/doing-business-hhs/provider-portals/long-term-care-providers/home-community-based-services-hcs

Texas Health and Human Services. (2018, March). Evaluation of Intermediate Care Facility conversion cost effectiveness. Retrieved from Texas Health and Human Services: https://hhs.texas.gov/reports/2018/02/evaluation-intermediate-care-facility-conversion-cost-effectiveness

Texas Low Income Housing Information Service. (2018, March 13). About. Retrieved from Texas Housers: https://texashousers.net/members/

Tighe, J. R., Hatch, M. E., & Mead, J. (2017). Source of income discrimination and fair housing policy. Journal of Planning Literature, 32(1), 3-15.

U.S. Census Bureau. (2016). Industry by sex for the civilian employed population 16 years and over: 2012-2016 American Community Survey 5-year estimates. Retrieved from United States Census Bureau: American FactFinder: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF

U.S. Census Bureau. (2016). Poverty status in the past 12 months of families by family , age of related children. Retrieved from American FactFinder: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_16_5YR_B17010&prodType=table

U.S. Census Bureau. (2016). Selected economic characteristics: 2012-2016 American Community Survey 5-year estimates. Retrieved from United States Census Bureau: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF

U.S. Centers for Medicare & Medicaid Services. (2016, November 22). Intermediate care facilities for individuals with intellectual disabilities (ICFs/IID). Retrieved from CMS.gov: https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/CertificationandComplianc/ICFIID.html

U.S. Department of Housing and Urban Development, U.S. Department of Justice. (2013, April 30). Joint statement of the department of housing and urban development and the department of justice: Accessibility (design and construction) requirements for covered multifamily dwellings under the fair housing act.

U.S. Department of Housing and Urban Development. (2013). Affirmatively Furtherting Fair Housing Data Analysis Tool. Retrieved from Affirmatively Furthering Fair Housing: https://egis.hud.gov/Affht/#

U.S. Department of Housing and Urban Development. (2014, July 14). Relocation Requirements under the Rental Assistance Demonstration (RAD) Program, Public Housing in the First Component. Retrieved from HUD.gov: https://www.hud.gov/sites/documents/RAD_NOTICE2.PDF

U.S. Department of Housing and Urban Development. (2016, September). What is a balanced approach to fair housing? Retrieved from HUD Exchange: https://www.hudexchange.info/faqs/3016/what-is-a-balanced-approach-to-fair-housing/

U.S. Department of Housing and Urban Development. (2017). Assisted Housing: National and local. Retrieved from HUD User: https://www.huduser.gov/portal/datasets/assthsg.html#2009-2017

U.S. Department of Housing and Urban Development. (2018, April 30). Rental Assistance Demonstration (RAD). Retrieved from HUD.GOV: https://www.hud.gov/RAD

U.S. Department of Housing and Urban Development. (2018, March 10). Fair Housing Assistance Program. Retrieved from HUD.Gov: https://www.hud.gov/program_offices/fair_housing_equal_opp/partners/FHAP

U.S. Department of Housing and Urban Development. (2018, March 12). Fair Housing. Retrieved from HUD.GOV: https://www.hud.gov/program_offices/fair_housing_equal_opp

U.S. Department of Housing and Urban Development. (2018, March 12). FHEO Directory. Retrieved from HUD.GOV: https://www.hud.gov/program_offices/fair_housing_equal_opp/fheodir#oplio

U.S. Department of Housing and Urban Development: Office of Policy Development and Research. (2014). Consolidated Planning/CHAS data. Retrieved from HUD User: https://www.huduser.gov/portal/datasets/cp.html

U.S. Department of Housing and Urban Development: Office of Policy Development and Research. (2014). Income limits. Retrieved from HUD User: https://www.huduser.gov/portal/datasets/il.html

United States Department of Agriculture. (2015). Food Access Research Atlas. Retrieved from USDA: https://www.ers.usda.gov/data-products/food-access-research-atlas/

United States v. City of Beaumont, Texas (E.E. Tex.), 1:15-cv-00201 (United States District Court for the Eastern District of Texas Beaumont Division January 14, 2016).

United Way of Tarrant County. (2018, May 6). Las Vegas Trail Revitalization project. Retrieved from United Way of Tarrant County: https://unitedwaytarrant.org/lvtrp/

Urban Institute (2005). Low-Income Families Are Moving to Better Neighborhoods with Help from Chicago's Housing Mobility Program. Retrieved from http://webarchive.urban.org/publications/900789.html

Villanueva, C. (2015, February 16). School finance made easy: Part 1: Educational instruction and operation. Retrieved from Center for Public Policy Priorities: https://forabettertexas.org/images/EO_2015_SchoolFinance_FlowChart.pdf

Villanueva, C. (2018, February 15). Education: Latest Work. Retrieved from Center for Public Policy Priorities: https://www.forabettertexas.org/images/EO_2015_SchoolFinance_FlowChart.pdf

Villanueva, C. (2018, February). Investing in our future: What you need to know as Texas re-examines the school finance system. Retrieved from Center for Public Policy Priorities: https://www.forabettertexas.org/images/EO_2018_SchoolFinSeries_part2.pdf

Walters, E. (2016, May 30). Disability community divided on sub-minimum wage program. Retrieved from The Texas Tribune: https://www.texastribune.org/2016/05/30/disability-community-split-sub-minimum-wage-progra/

Watson, N. E., Steffen, B. L., Martin, M., & Vandenbroucke, D. A. (2017, August). Worst case housing needs: 2017 report to Congress. Retrieved from HUD User: https://www.huduser.gov/portal/sites/default/files/pdf/Worst-Case-Housing-Needs.pdf

WorkReady Texas. (2018, March 4). Our Locations. Retrieved from WorkReady Texas: http://workreadytexas.com/locations/

Affirmatively Furthering Fair Housing
Data and Mapping Tool (AFFH-T)
Data Documentation

Data Version AFFHT0001

Last revised:
September 29, 2017

HUD, Office of Policy Development & Research[1]

Table of Contents

List of Tables

Document Revision History

Date (in order of most recent revision)	Change Description / Purpose
September 29, 2017	In Section X: R/ECAPs, formula has been modified to reflect the correct calculation method for R/ECAPs
July 20, 2016	Original document provided with AFFH-T Release 3.1/Data Version AFFHT0001

I.   Overview

HUD has asked its program participants to take a more serious look at their fair housing context. The agency is taking a more active role as a dynamic partner by providing data and analytical tools to help grantees quantify and interpret particular fair housing dynamics. HUD provides a dynamic online mapping and data-generating tool for communities to aid in their completion of the Assessment of Fair Housing using the Assessment Tool. HUD accompanies this tool with guidance tailored to accommodate program participants of all capacity levels.

This document outlines the data, methods, and sources behind the tool that HUD provides. It describes demographic, socioeconomic, and housing characteristics, as well as access to opportunity areas through a series of Opportunity Indices.

This data package is not exhaustive and should not supplant local data or knowledge that is more robust. It represents a baseline effort to assemble consistent, nationally available data from a variety of sources compiled into one location.

II.   Data Sources

Table 1 lists data sources, years, and the spatial scale used to populate the tables and maps in the AFFH Tool.

Table 1: Data Sources

Data Category	Variables	Geographic level or Primary Sampling Unit	Tables	Maps	Sources and years
Demographics	Race/Ethnicity population in 2010	Block-group	1, 2, 4	1, 5-7, 9-15	Decennial Census, 2010
Demographics	Race/Ethnicity population in 2000 & 1990	Tract	2	2	Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2000 & 1990
Demographics	Percent of race/ethnicity census tract	Tract	8	na	Decennial Census, 2010
Demographics	Limited English Proficiency (LEP) population; LEP languages; Foreign-born population; Foreign-born population place of birth (national origin)	Tract	1, 2, 4	3, 4, 8, 9-15	American Community Survey (ACS), 2009-2013; Decennial Census, 2000; Decennial Census, 1990[a]
Demographics	Disability Type population; Disabled population by Age	Tract	1, 13, 14	16, 17	American Community Survey (ACS), 2009-2013[b]
Demographics	Population by Age, Sex, Family Type	Tract	1, 2, 4	9-15	Decennial Census, 2010; Decennial Census, 2000; Decennial Census, 1990
Socioeconomic	Racially/Ethnically-Concentrated Areas of Poverty (R/ECAP)	Tract	4, 7	1-17	American Community Survey (ACS), 2009-2013; Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2000 & 1990
Housing	Population, housing units, occupied housing units, race/ethnicity, age, disability status, household type, and household size by Housing Type	Development; Tract	5-7, 11, 15	5, 6	Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACS), 2013
Housing	Low-Income Housing Tax Credit developments	Development	8	5	National Low-Income Housing Tax Credit (LIHTC) Database, 2013

Data Category	Variables	Geographic level or Primary Sampling Unit	Tables	Maps	Sources and years
Housing	Households with Housing Problems; Households with Severe Housing Problems; Households with Income Less than 31% of Area Median Income (AMI); Households with Severe Housing Cost Burden; Households with Housing Problems by Race, Household Type, Household Size	Tract	9, 10	7, 8	Comprehensive Housing Affordability Strategy (CHAS), 2008-2012
Opportunity Indices	Dissimilarity Index	Community Development Block Grant (CDBG); Core Based Statistical Area (CBSA)	3	na	Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990
Opportunity Indices	Low Poverty Index, Labor Market Engagement Index	Tract	12	11, 14	American Community Survey (ACS), 2009-2013
Opportunity Indices	School Proficiency Index	Block-group	12	9	Great Schools, 2012; Common Core of Data (4th grade enrollment and school addresses), 2012; School Attendance Boundary Information System (SABINS), 2012
Opportunity Indices	Low Transportation Cost Index; Transit Trips Index	Tract	12	12, 13	Location Affordability Index (LAI) data, 2008-2012
Opportunity Indices	Jobs Proximity Index	Block-group	12	10	Longitudinal Employer-Household Dynamics (LEHD), 2013
Opportunity Indices	Environmental Health Index	Tract	12	15	National Air Toxics Assessment (NATA) data, 2005

[a] For variables on limited English proficiency, foreign born, and foreign born by national origin, percentages using data from the American Community Survey (ACS), 2009-2013 are calculated using total population from the 2010 decennial census. Percentages using 2000 and 1990 decennial census data are also calculated using total population.

[b] For variables on disability, percentages are calculated based on the total population age 5 years and older.

III.   Levels of Geography and Weights

The AFFH Tool includes data for all U.S. states, the District of Columbia, and Puerto Rico. Users may access data through the AFFH Tool at various spatial scales, including geo-boundaries of Census tracts, the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), and the Core-based Statistical Area (CBSA). As shown in Table 1, most data in the AFFH Tool are at the Census tract or block-group levels. The selection of a spatial scale to use as the initial basis for each data element is primarily based on the lowest level in which HUD has faith in its accuracy. For example, data elements constructed from the American Community Survey (ACS) data are based on Census tract estimates rather than block-group estimates due to concerns about sampling errors.

Data displayed in the AFFH Tool map views are at the Census tract level. Data displayed in the report tables are aggregated from smaller geographic units (i.e. either the Census tract or block-group level) to the CDBG[2] and CBSA levels. As shown in Table 1, the AFFH data are from multiple sources in various years. In order to compile them into one mapping tool database, data issued or released at different years need to be adjusted to the same year. The Census tract and block-group boundaries in the AFFH Tool are based on those released by Census in 2010. The Tool incorporates minor changes indicated in the ACS "Geography Release Notes" for 2011 and 2012 on the Census Bureau website[3], resulting in boundaries and corresponding data adjusted to calendar year 2012. The CDBG and HOME boundaries are based on political jurisdiction boundaries for calendar year 2015. The CBSA boundaries are based on OMB 2013 definitions.

The CDBG level and the HOME level reflect the geographical boundaries for grantees that receive direct allocations of CDBG and HOME funds from HUD. CDBGs and HOMEs are not census-designated areas, which means that these jurisdictional boundaries do not fall consistently along Census tracts or block-groups. A series of technical procedures were necessary to construct a crosswalk between census-designated areas and CDBGs and HOMEs. Census geographic identifiers at the summary level 070 (state-county-county subdivision-place/remainder) and summary level 080 (state-county-county subdivision-place/remainder-census tract) were matched to HUD CDGB and HOME jurisdiction geographic identifiers.

Weights

At the boundaries of CDBG and HOME jurisdictions, some Census tracts fell partially within the jurisdiction and partially outside of the jurisdiction. Data from these tracts were weighted by the share of the population within the CDBG and HOME boundaries to approximate including only the portion of those tracts within the jurisdictions in aggregate figures reported at the CDBG and HOME levels. In contrast, block groups were simply assigned to the CDBG and HOME jurisdictions that contained its centroid.

---

[2]   CDBG jurisdictions in the AFFH Tool exclude non-entitlement jurisdictions.

[3]   Tract changes between 2010 and 2011 are here: http://www.census.gov/acs/www/data_documentation/2011_geography_release_notes/; Tract changes between 2011 and 2012 are here: http://www.census.gov/acs/www/data_documentation/2012_geography_release_notes/

IV. Race/Ethnicity

Among other factors, the Fair Housing Act prohibits housing discrimination based on race. HUD offers information on both race and ethnicity. HUD provides data for non-Hispanic whites, considering Hispanics of any race as a separate race/ethnic category that can experience housing discrimination differently than other groups. Similarly, the data provided for the other race groups – black, Asian and Pacific Islander, Native American, and other – also exclude information for people who identify as having Hispanic ethnicity. Other race/ethnicity data are discussed in sections IX and XI.

The 2010 racial data from the 2010 census in Table 2 and Map 1 excludes multiracial individuals, while the 1990 and 2000 racial data from the Brown Longitudinal Tract Database in Table 2 and Map 2 includes multiracial individuals in the racial categories. The public use files include 2010 racial data from the Brown Longitudinal Tract Database consistent with its 1990 and 2000 data. These data will be incorporated into a future update of the mapping tool.

Counts of multiracial individuals from the 2010 census are included in the public use files.

Data Source: American Community Survey (ACS) 2009-2013; Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2000 & 1990

Related Template Tables/Maps: Table 1, 2, 4; Map 1, 2, 5-7, 9-15

V. National Origin and Limited English Proficiency (LEP)

The Fair Housing Act also prohibits housing discrimination based on national origin. The AFFH Tool provides data for four indicators of national origin. The first two are the ten most common places of birth of the foreign-born population by jurisdiction and region and the number and percentage of the population that is foreign-born. The second two indicators are the ten most common languages spoken at home (for the population age 5 years and over) for those who speak English "less than 'very well,'" and the number and percentage of the population who speak English "less than very well."[4]

Data on national origin and LEP originate from the 2009-2013 American Community Survey and from 2000 and 1990 Decennial Census data. Counts of each place of birth by tract were aggregated to the jurisdiction and regional level separately. Within these geographies, the counts for places of birth were ranked and the ten most populous groups were determined and are presented.

The ten most common places of birth and LEP languages are displayed in the Template Tables, while the top five are displayed in the Template Maps. HUD limits the number of categories for the maps in order to better visualize the most significant groups. National origin and LEP data were missing for Puerto Rico.

---

[4] Percentages using data from the American Community Survey (ACS), 2009-2013 are calculated using total population from the 2010 decennial census. Percentages using decennial census data from 2000 and 1990 are also calculated using total population.

Data Source: American Community Survey (ACS) 2009-2013; Decennial Census, 2000; Decennial Census 1990.

Related Template Tables/Maps: Table 1, 2, 4; Map 3, 4, 8, 9-15

VI.   Disability Status and Type

The Fair Housing Act prohibits housing discrimination of any person based on disability. The AFFH Tool provides information on disability type, disability status by age group, and disability status by housing type. The disability type and disability status by age group measures are from the ACS, while the measure of people with disabilities by housing type is from the PIC/TRACS data (see section IX). The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

The disability type categories are: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. These categories are based on a new set of disability questions introduced into the ACS in 2008 and are not comparable to disability type figures in prior years.[5]

Data Source: American Community Survey (ACS), 2009-2013; Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACS), 2013
Related Template Tables/Maps: Table 1, 13, 14; Map 16, 17

VII.   Sex

The Fair Housing Act prohibits housing discrimination of any person based on sex. The AFFH Tool provides information on male/female status.

Data Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2000 & 1990

Related Template Tables/Maps: Table 1, 2

VIII. Families with Children and Age

The Fair Housing Act prohibits housing discrimination of any person based on familial status. The AFFH Tool provides information on families with children. Specifically, familial status is measured as the number and percentage of all families (with two or more related people in the household) that are families with children under age 18. The Tool also provides data on age group (under 18, 18-64, and 65+).

The 1990 data on families with children in Table 2 did not include information on families with a male householder, no wife present. The data have been corrected in the public use files and will be incorporated in a future update of the mapping tool.

Data Source: Decennial Census, 2010; Decennial Census, 2000; Decennial Census 1990

---

[5]   For variables on disability, percentages are calculated based on the total population age 5 years and older.

Related Template Tables/Maps: Table 1, 2, 4; Map 9-15

IX.   Households in Publicly Supported Housing

The AFFH Tool provides data on households within the following housing categories: Public Housing, Section 8 Project-based Rental Assistance (PBRA), other assisted housing multifamily properties, Section 8 Housing Choice Voucher (HCV) Program, and Low-Income Housing Tax Credit (LIHTC). The "Other HUD Multifamily" properties include properties funded through the Supportive Housing for the Elderly (Section 202), Supportive Housing for Persons with Disabilities (Section 811), Rental Housing Assistance (Section 236), Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Below Market Interest Rates (BMIR) programs.

The sources for data on households in these housing types are:

- HCV: census tract-level data extract from the Family Report Form HUD-50058 (PIC)
- Public Housing: development-level data extract from the Family Report Form HUD-50058 (PIC)
- PBRA and other multifamily properties: development-level data extract from HUD-50059 (TRACS)
- LIHTC: National Low-Income Housing Tax Credit (LIHTC) Database

The Tool reports data by housing type differently depending on the report table. These details are outlined below:

Tables 5, 6, 11, and 15 present data on households in Public Housing, PBRA, other publicly supported housing multifamily properties, and HCV. Data on developments with fewer than 11 households reported or with fewer than 50 percent of occupied units reported at the CDBG or HOME and CBSA aggregations were omitted to ensure confidentiality.

Table 5 presents the total number of units in publicly supported housing programs and their share of the total number of housing units within CDBG or HOME jurisdictions. The denominator used in Table 5 is the total number of housing units in the 2010 census block-group aggregated at the CDBG or HOME level.

Table 6 presents data on the race and ethnicity of households in publicly supported housing programs. The race/ethnicity categories are non-Hispanic white, non-Hispanic black, Hispanic, and non-Hispanic Asian or Pacific Islander. Information on the race and ethnicity of households with incomes at or below 30 percent of the area median income (AMI) is from the Comprehensive Housing Affordability Strategy (CHAS) database.

Table 7 reports the following data on households in publicly supported housing programs within the CDBG or HOME jurisdiction: race/ethnicity (percent white, black, Hispanic, and Asian or Pacific Islander), percent of households with at least one member with a disability, and percent of households where the head or spouse is age 62 or older. The data in this table are presented separately for properties/households located within and outside of racially/ethnically-concentrated areas of poverty (detailed below in section X) within the CDBG or HOME jurisdiction.

Table 8 presents data on the composition of households assisted through Public Housing, PBRA, and other HUD multifamily properties. Population characteristics – race/ethnicity (white, black, Hispanic, Asian), households with children, and poverty rate – of the census tracts that contain assisted housing are also presented. Although information on households in LIHTC properties is not displayed in Table 8, the data on geographical coordinates for properties were used to identify the list of census tracts presented. Data on properties with fewer than 11 households reported or with fewer than 50 percent of occupied units reported at the development and at the Census tract aggregation were omitted to ensure confidentiality.

Tables 7 and 8 include only developments with precise spatial information, such as a rooftop location or the ZIP+4 centroid associated with the address. Developments with less precise spatial information are omitted because they cannot reliably be located to the correct street block or the correct side of the street block.

In conjunction with Tables 7 and 8, Maps 5 and 6 also include only developments with precise spatial information. Over 96 percent of Public Housing, PBRA, and other HUD multifamily properties and 84 percent of LIHTC properties have sufficient geographical information to be included in the tables and maps.

Tables 11 and 15 present data on unit size (households in 0-1 bedroom units, 2 bedroom units, and 3 or more bedroom units), households with children, and households where at least one member has a disability.

Data Source: Inventory Management System (IMS)/PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACS), 2013; National Low-Income Housing Tax Credit (LIHTC) Database, 2013; Decennial Census, 2010; Comprehensive Housing Affordability Strategy (CHAS), 2008-2012

Related Template Tables/Maps: Table 5-8, 11, 15; Map 5, 6

X.   R/ECAPs

To assist communities in identifying racially or ethnically-concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of "extreme poverty" as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. This translates into the following equation:

$$\frac{R}{ECAP_i} = yes \dots if \dots \begin{cases} PovRate_i \geq \left[3 * \mu_{PovRate}^{cbsa}\right] \\ or \\ PovRate_i \geq 0.4 \end{cases} \cap \left[\frac{(Pop_i - NHW_i)}{Pop_i}\right] \geq 0.50$$

Where i represents census tracts, $(\mu_{PovRate}^{cbsa})$ is the metropolitan/micropolitan (CBSA) mean tract poverty rate, PovRate is the ith tract poverty rate, (NHW_i) is the non-Hispanic white population in tract i, and Pop is the population in tract i.

While this definition of R/ECAP works well for tracts in CBSAs, place outside of these geographies are unlikely to have racial or ethnic concentrations as high as 50 percent. In these areas, the racial/ethnic concentration threshold is set at 20 percent.

Data Source: American Community Survey (ACS), 2009-2013; Decennial Census (2010); Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2000 & 1990

Related Template Tables/Maps: Table 4, 7; Map 1-17

References:
Wilson, William J. (1980). The Declining Significance of Race: Blacks and Changing American Institutions. Chicago: University of Chicago Press.

XI.   Housing Problems and Disproportionate Housing Need

To assist communities in describing disproportionate housing need in their geography, the AFFH Tool provides data identifying instances where housing problems or severe housing problems exist. The Tool presents housing problems overall, as well as variations by race/ethnicity, household type and household size. The race/ethnicity categories presented are non-Hispanic white, non-Hispanic black, Hispanic, non-Hispanic Asian or Pacific Islander, non-Hispanic Native American, and non-Hispanic other. The household type and size categories presented are family households of less than five people, family households of five or more people, and non-family households of any size.

Information on housing problems is drawn from CHAS, which demonstrate the extent of housing problems and housing needs, particularly for low-income households. The CHAS data are produced via custom tabulations of ACS data by the U.S. Census Bureau.

The Tool provides data on the number and share of households with one of the following four housing problems:

1. Lacks complete kitchen facilities
2. Lacks complete plumbing facilities
3. More than one person per room
4. Cost Burden - monthly housing costs (including utilities) exceed 30% of monthly income

Additionally, the Tool provides data on the number and share of households with one or more of the following "severe" housing problems, defined as:

1. Lacks complete kitchen facilities
2. Lacks complete plumbing facilities
3. More than one person per room
4. Severe Cost Burden - monthly housing costs (including utilities) exceed 50% of monthly income

Program participants should review these data to determine where disproportionate housing need may be found. For example, a sub-group, such as households of a particular racial/ethnic group or household size, may experience housing problems more frequently than the overall population.

Data Source: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012

Related Template Tables/Maps: Table 9, 10; Map 7, 8

XII.   Indices

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. A description of the methodology for each of the following indices may be found below:

1. Dissimilarity Index
2. Low Poverty Index
3. School Proficiency Index
4. Jobs Proximity Index
5. Labor Market Engagement Index
6. Low Transportation Cost Index
7. Transit Trips Index
8. Environmental Health Index

Table 3 of the AFFH data tables provides values for the dissimilarity index. Table 12 of the AFFH data tables provides values for all the remaining indices.

To generate Table12, index values were calculated for each census tract. These tract values were averaged and then weighted based on the distribution of people of different races and ethnicities within the CDBG jurisdiction, HOME jurisdiction, or CBSA to generate composite index values for each race and ethnicity. A similar process was applied to weight the data based on the distribution of people of different races and ethnicities who are living below the federal poverty line within the CDBG or HOME jurisdiction and CBSA. The population estimates are based on the 2010 Decennial Census at the census tract or block-group level, depending on the geographic level at which the index was originally calculated.

The indices from Table 12 are also used to populate maps generated by the AFFH data and mapping tool, showing the overall index values of census tracts juxtaposed against data on race/ethnicity, national origin, and family type.

The following details each of the eight indices used in the AFFH Template.

A. Analyzing Segregation

1. Dissimilarity Index

Summary
The dissimilarity index (or the index of dissimilarity) 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. It is calculated as:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes census block-groups or tracts, j is the jth jurisdiction, W is group one and B is group two, and N is the number of block-groups or tracts i in jurisdiction j.

Interpretation
The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups. The following is one way to understand these values:

Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

In Table 3, the dissimilarity indices for 2010 exclude multiracial individuals, while the 1990 and 2000 racial data from the Brown Longitudinal Tract Database includes multiracial individuals in the racial categories. The public use files include 2010 dissimilarity indices based on data from the Brown Longitudinal Tract Database consistent with its 1990 and 2000 data. These 2010 dissimilarity indices will be added into a future update of the mapping tool.

Data Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990. Block-group level data were used for 2010, and census tracts were used for 2000 and 1990.

Related Template Tables/Maps: Table 3

References:
Massey, Douglas S. and Nancy A. Denton. 1988. The Dimensions of Residential Segregation. Social Forces, 67(2): 281-315.

B. Analyzing Disparities in Access to Opportunity

HUD has developed a two-stage process for analyzing disparities in access to opportunity. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important opportunity indicators such as education, employment, and transportation, among others. This stage uses metrics that rank each neighborhood along a set of key dimensions. In the second stage, HUD compares these rankings across people in particular racial and economic subgroups to characterize disparities in access to opportunity. HUD considers opportunity indicators a multi-dimensional notion. To focus the analysis, HUD developed methods to quantify a selected number of the important opportunity indicators in every neighborhood. These dimensions were selected because existing research suggests they have a bearing on a range of individual outcomes. HUD has selected five dimensions upon which to focus: poverty, education, employment, transportation, and health.

Invariably, these dimensions do not capture everything that is important to the well-being of individuals and families. In quantifying indicators of access to opportunity, HUD is not making a definitive assessment of one's life chances based on geography. HUD is quantifying features of neighborhoods for the purpose of assessing whether significant disparities exist in the spatial access or exposure of particular groups to these quality of life factors. While these important dimensions capture a number of key concepts identified by research as important to quality of life, the measures are not without limitations. HUD constrained the scope of HUD-provided items to those that are closely linked to neighborhood geographies and could be measured consistently at small area levels across the country. For example, HUD's measure of school performance only reflects elementary school proficiency. It does not capture academic achievement for higher grades of schooling, which is important to a community's well-being, but likely less geographically tied to individual neighborhoods than elementary schools. Similarly, the health hazard measure only captures outdoor toxins, missing indoor exposures. The national-availability restriction is a necessity given that all HUD program participants must complete an Assessment of Fair Housing. HUD realizes that there are other assets that are relevant, such as neighborhood crime or housing unit lead and radon levels. However, these lack consistent neighborhood-level data across all program participant geographies. As a consequence, HUD encourages program participants to supplement the data it provides with robust locally-available data on these other assets so that the analysis is as all-encompassing as possible. The five dimensions are operationalized by seven indices, described below.

2. Low Poverty Index

Summary
The low poverty index captures poverty in a given neighborhood. The index is based on the poverty rate (*pv*).

$$Pov_i = \left[\left(\frac{pv_i - \mu_{pv}}{\sigma_{pv}} \right) * -1 \right]$$

The mean (μ_{pv}) and standard error (σ_{pv}) are estimated over the national distribution.

The poverty rate is determined at the census tract level.

Interpretation
Values are inverted and percentile ranked nationally. The resulting values range from 0 to 100. The higher the score, the less exposure to poverty in a neighborhood.

Data Source: American Community Survey, 2009-2013

Related Template Tables/Maps: Table 12; Map 14

3. School Proficiency Index

Summary
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 school proficiency index is a function of the percent of 4th grade students proficient in reading (*r*) and math (*m*) on state test scores for up to three schools (i=1,2,3) within 1.5 miles of the block-group centroid. *S* denotes 4th grade school enrollment:

$$School_i = \sum_{n=i}^{3} \left(\frac{s_i}{\sum^n s_i}\right) * \left[\frac{1}{2} * r_i + \frac{1}{2} * m_i\right]$$

Elementary schools are linked with block-groups based on a geographic mapping of attendance area zones from School Attendance Boundary Information System (SABINS), where available, or within-district proximity matches of up to the three-closest schools within 1.5 miles. In cases with multiple school matches, an enrollment-weighted score is calculated following the equation above.

Interpretation
Values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

Data Source: Great Schools (proficiency data, 2011-12 or more recent); Common Core of Data (school addresses and enrollment, 2011-12); SABINS (attendance boundaries, 2011-12).

Related Template Tables/Maps: Table 12; Map 9

4. Jobs Proximity Index

Summary
The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. Specifically, a gravity model is used, where the accessibility (*Ai*) of a given residential block-group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. More formally, the model has the following specification:

$$A_i = \frac{\sum_{j=1}^{n} \frac{E_j}{d_{i,j}^2}}{\sum_{j=1}^{n} \frac{L_j}{d_{i,j}^2}}$$

Where *i* indexes a given residential block-group, and *j* indexes all *n* block groups within a CBSA. Distance, *d*, is measured as "as the crow flies" between block-groups *i* and *j*, with distances less than 1 mile set equal to 1. *E* represents the number of jobs in block-group *j*, and *L* is the number of workers in block-group *j*.

The Longitudinal Employer-Household Dynamics (LEHD) has missing jobs data in all of Puerto Rico and a concentration of missing records in Massachusetts.

Interpretation
Values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

Data Source: Longitudinal Employer-Household Dynamics (LEHD) data, 2013

Related Template Tables/Maps: Table 12; Map 10

5. Labor Market Engagement Index

Summary
The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract (*i*). Formally, the labor market index is a linear combination of three standardized vectors: unemployment rate (*u*), labor-force participation rate (*l*), and percent with a bachelor's degree or higher (*b*), using the following formula:

$$LBM_i = \left[\left(\frac{u_i - \mu_u}{\sigma_u} \right) * -1 \right] + \left(\frac{l_i - \mu_l}{\sigma_l} \right) + \left(\frac{b_i - \mu_b}{\sigma_b} \right)$$

Where the means (μ_u, μ_l, μ_b) and standard errors (σ_u, σ_l, σ_b) are estimated over the national distribution. Also, the value for the standardized unemployment rate is multiplied by -1.

Interpretation
Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.

Data Source: American Community Survey, 2006-2010

Related Template Tables/Maps: Table 12; Map 11

6. Low Transportation Cost Index

Summary
This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. CBSA). The estimates come from the Location Affordability Index (LAI). The data used in the AFFH Tool correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary. More specifically, among this household type, we model transportation costs as a percent of income for renters (t_rent). Neighborhoods are defined as census tracts. The LAI data do not contain transportation cost information for Puerto Rico.

Interpretation
Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the index, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a range of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

Data Source: Location Affordability Index (LAI) data, 2008-2012

Related Template Tables/Maps: Table 12; Map 13

References:
www.locationaffordability.info
http://lai.locationaffordability.info//lai_data_dictionary.pdf

7. Transit Trips Index

Summary

This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The estimates come from the Location Affordability Index (LAI). The data used in the AFFH tool correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary. More specifically, among this household type, we model annual transit trips for renters (transit_trips_rent). Neighborhoods are defined as census tracts. The LAI has missing transit trip information for Puerto Rico.

Interpretation

Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the transit trips index, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

Data Source: Location Affordability Index (LAI) data, 2008-2012

Related Template Tables/Maps: Table 12; Map 12

References:
www.locationaffordability.info
http://lai.locationaffordability.info//lai_data_dictionary.pdf

8. Environmental Health Index

Summary

The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic (*c*), respiratory (*r*) and neurological (*n*) hazards with *i* indexing census tracts.

$$EnvHealth_i = \left[\left(\frac{c_i - \mu_c}{\sigma_c}\right) + \left(\frac{r_i - \mu_r}{\sigma_r}\right) + \left(\frac{n_i - \mu_n}{\sigma_n}\right)\right] * -1$$

Where means (μ_c, μ_r, μ_n) and standard errors ($\sigma_c, \sigma_r, \sigma_n$) are estimated over the national distribution.

Interpretation

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.

Data Source: National Air Toxics Assessment (NATA) data, 2005

Related Template Tables/Maps: Table 12; Map 15

References:
http://www.epa.gov/ttn/atw/natamain/

C. Computing Indices by Protected Class

The AFFH Tool provides index values documenting the extent to which members of different racial or ethnic groups have access to particular opportunity indicators. The Tool provides a weighted average for a given characteristic. The generic access for subgroup *M* to asset dimension *R* in jurisdiction *j* is calculated as:

$$Index_M^R = \sum_{i}^{N} \frac{M_i}{M_j} * R_i$$

Where *i* indicates Census tracts in jurisdiction *j* for subgroup *M* to dimension *R*. *N* is the total number of Census tracts in jurisdiction j.

It is useful to provide an example of this in practice (Table 2). Consider Jurisdiction X with a total of three neighborhoods (A, B, and C). Each neighborhood has an index score representing the prevalence of poverty within that neighborhood (Column (1), with higher values representing lower levels of poverty. To compute the index value for a particular subpopulation, such as white or black individuals, the values are weighted based on the distribution of that subpopulation across the three neighborhoods. For example, 40% of the jurisdiction's white population lives in neighborhood A, so the index value for neighborhood A represents 40% of the composite index value for the white population in the jurisdiction. The values for neighborhoods B and C are weighted at 40% and 20% respectively, based on the share of white individuals living in those neighborhoods, leading to a final weighted low poverty index for whites in the jurisdiction of 56.

Table 2. Example of Weighting of Low Poverty Index by Race in a Hypothetical Jurisdiction

	Dimension	White			Black		
Neighborhood	**Low Poverty Index**	**white pop**	**%white of total pop**	**Index for whites [(1)*(3)]**	**black pop**	**%black of total pop**	**Index for blacks [(1)*(6)]**
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
A	80	400	40%	32	100	20%	16
B	50	400	40%	20	150	30%	15
C	20	200	20%	4	250	50%	10
Total		1000	100%	**56**	500	100%	**41**

This exercise can be repeated for each racial/ethnic group. For example, the low poverty index among blacks in Jurisdiction X is 41. Using these indices, it is possible to identify differences in access to opportunity across protected classes.

To account for differences in household income across groups, the AFFH Tool also provides separate index values for persons below the federal poverty line, again breaking out values by racial or ethnic group. This helps program participants understand whether there are meaningful differences in access to opportunity indicators across groups that cannot be explained by differences in income. These index values by protected class among the total and populations below the federal poverty line are available in Table 12.

Assessing Segregation

To assess levels and patterns of segregation, HUD has provided program participants with a 'Dissimilarity Index" which measures the relative degree of segregation between two groups. A higher value indicates a higher degree of dissimilarity. To supplement the HUD dissimilarity index and assess spatial patterns of segregation, our team of researchers has developed the following methodological protocol.

Using the dissimilarity value as a starting point, the intent is to measure to what extent the racial composition of a given census tract significantly differs from the overall jurisdictional racial composition. In other words, the objective is to assess whether a statistically significant difference between the racial makeup of a census tract (conventional equivalent of a neighborhood) and the overall city exists. The assessment performs a series of "Z-test" for Non-white groups/White, Non-black groups/Black, Non-Hispanic groups/Hispanic, and Non-AsianPI groups/AsianPI – in accordance with the available HUD dissimilarity indices. The values obtained from this type analysis allow determining whether a statistical difference exists.

Below is a brief overview of the analytical steps taken to assess spatial patterns of segregation.

A. Z-TEST

In order to compare the jurisdictional racial/ethnic composition with that in each census tract, we decided to use t-test.

Test statistic:

$$Z = \frac{\hat{p} - p_0}{\sqrt{\frac{p_0(1-p_0)}{n}}}$$

$\hat{p}$= percentage of selected racial/ethnic group in census tract (i.e. 'Non-white)

p_0= percentage of selected racial/ ethnic group in jurisdiction (i.e. 'Non-white)

n= total population census tract

For each census tract, a Z value and its corresponding 'p-value' may be used to assess changes from the jurisdictional values; using these values one may accept or reject the hypothesis that the racial composition of the census tract is statistically different from the jurisdiction. Put simply, if the p-value is smaller than 0.05 (one tail) or 0.025 (two-tail test), then a statistical difference between the census tract and the city (at a 95% of confidence) exists.

B. METHODOLOGICAL APPROACH

In order to assess the magnitude of the difference between the census tract and the jurisdiction, the analysis sequentially performs multiple z-tests. The first test considers if the census tract population proportion of interest is at least 40% larger than the jurisdictional proportion. After this first hypothesis test, the methodology conducts a series of hypothesis tests to form several percentage difference brackets:

- 30% - <40% greater than jurisdictional proportion
- 20% - <30% greater than jurisdictional proportion
- 10% - <20% greater than jurisdictional proportion

- 0% - <10% greater than jurisdictional proportion

If the change from the jurisdictional mean, is neither significantly greater nor lower (a two-tailed test) at a significance of five percent, the census tract is deemed integrated when considering the non-white groups/White comparison, and appropriately represented for the other comparisons. The final category includes the census tracts where the population proportion of interest is significantly smaller than the jurisdictional proportion at a significance of 2.5 percent.

The flow chart below shows how we decide which category a census tract belongs to:

Category	Meaning
1	Greater white (non-xxx) population share
2	Same as jurisdiction
3	0 to <10% greater than jurisdiction avg
4	10 to <20% greater than jurisdiction avg
5	20 to <30% greater than jurisdiction avg
6	30 to <40% greater than jurisdiction avg
7	More than 40% greater than jurisdiction avg
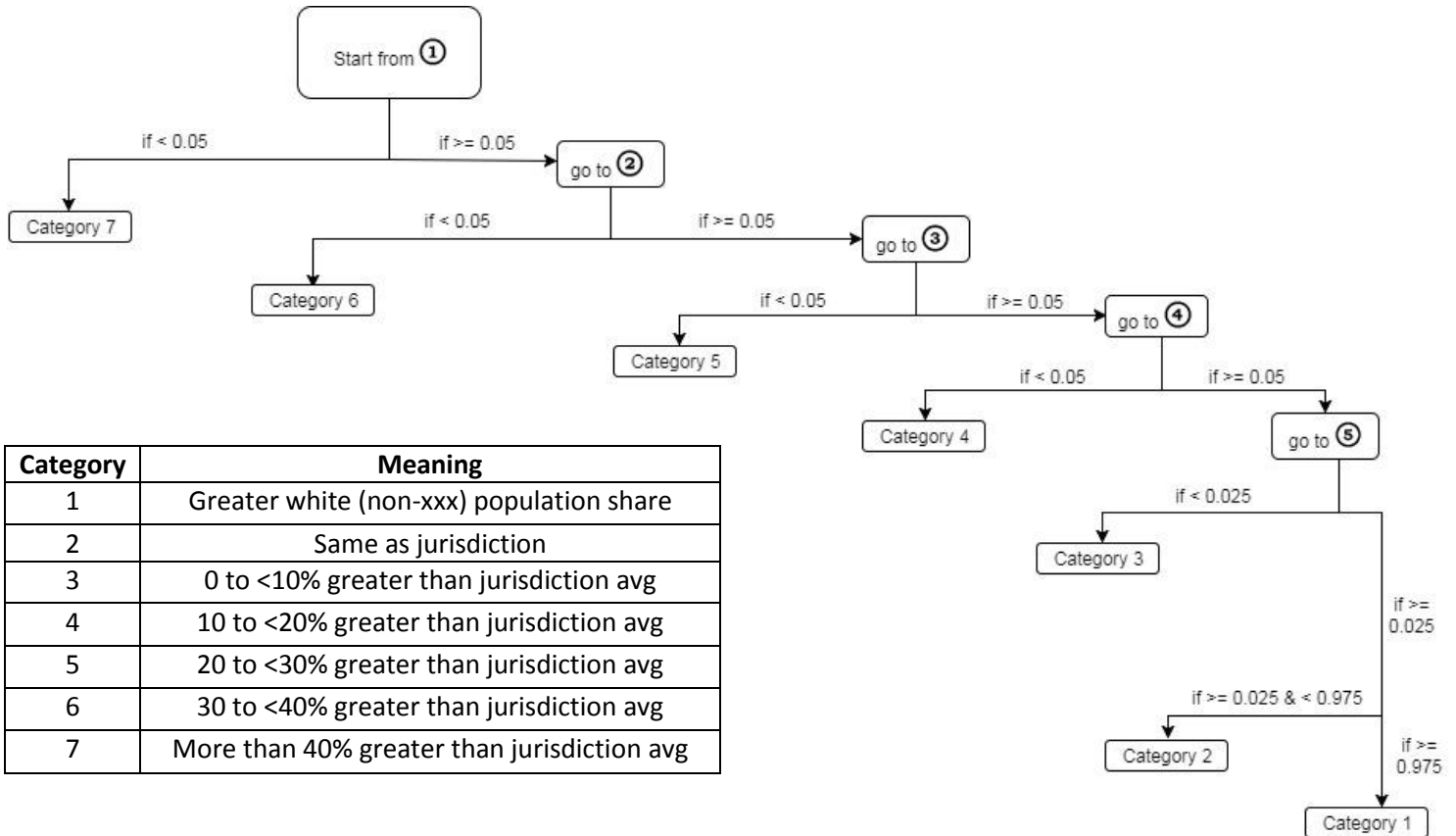
Example:

geoid	>40% z-score	① p-value	>30% z-score	② p-value	>20% z-score	③ p-value	>10% z-score	④ p-value	z-score	⑤ p-value	Category
48113014132	-43.9300	1	-34.15	1	-24.37	1	-14.6	1	-4.805	1	1
48113018505	-18.8854	1	-7.02	1	-4.839	0	16.7	0	-28.56	0	5
48113013625	-21.3627	1	-10.60	1	-0.158	0.437	10.9	0	21.68	0	4
48113010704	-16.3246	1	-0.923	0.822	14.48	0	29.9	0	45.28	0	5
48113010801	-24.3470	1	-4.024	1	16.30	0	36.6	0	56.94	0	5

NORTH TEXAS REGIONAL HOUSING ASSESSMENT

Data Summary
Dallas, TX

This document is intended to synthesize the key findings of the North Texas Regional Housing Assessment for the City of Dallas, TX. Additional information pertaining to assessment, data analyses, and fair housing goals can be found in Dallas' complete Assessment of Fair Housing report and data documentation booklet.

DALLAS/REGION IMBALANCES (ACS, 2016)

From a regional perspective, acute imbalances characterize the North Texas sociodemographic landscape.

Summary data findings:

- Nonwhite and households with an income below the poverty line disproportionally reside in the Dallas.
- A greater share of working poor households reside in Dallas than in the region.
- Correspondingly, data suggest that a greater supply of *more* affordable housing/cheaper housing units exists in Dallas than in the region

RACE/ETHNICITY	Dallas, TX		Dallas-Fort Worth-Arlington, TX Metro Area	
	Total	Below poverty line	Total	Below poverty line
White alone, not Hispanic or Latino	29%	**10%**	48%	**7%**
Black alone, not Hispanic or Latino	24%	**31%**	15%	**22%**
Hispanic of any race	42%	**28%**	28%	**22%**
Asian alone, not Hispanic or Latino	3%	**20%**	6%	**10%**
Other, not Hispanic or Latino	2%		3%	
EMPLOYMENT STATUS				
Employed	93%	**11%**	94%	**7%**
Unemployed	7%	**38%**	6%	**29%**

INCOME AND BENEFITS (IN 2016 INFLATION-ADJUSTED DOLLARS)	Dallas, TX		Dallas-Fort Worth-Arlington, TX Metro Area	
Total households	487,855	487,855	2,451,163	2,451,163
Less than $10,000	42,296	**8.7%**	135,118	**5.5%**
$10,000 to $14,999	28,720	**5.9%**	98,147	**4.0%**
$15,000 to $24,999	61,427	**12.6%**	217,666	**8.9%**
$25,000 to $34,999	59,023	**12.1%**	232,955	**9.5%**
$35,000 to $49,999	72,995	15.0%	319,172	13.0%
$50,000 to $74,999	81,389	16.7%	446,704	18.2%
$75,000 to $99,999	45,485	9.3%	304,489	12.4%
$100,000 to $149,999	44,858	9.2%	368,959	15.1%
$150,000 to $199,999	19,770	4.1%	158,327	6.5%
$200,000 or more	31,892	6.5%	169,626	6.9%
Median household income (dollars)	**$45,215**		**$61,330**	
Mean household income (dollars)	$75,411		$85,693	

PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL	Dallas, TX	Dallas-Fort Worth-Arlington, TX Metro Area
All families	**19.4%**	**10.8%**
Married couple families	11.6%	5.9%
Families with female householder, no husband present	36.8%	27.9%

MONTHLY HOUSING COSTS	Dallas, TX	Dallas-Fort Worth-Arlington, TX Metro Area
Less than $300	4.7%	3.3%
$300 to $499	7.1%	6.9%
$500 to $799	25.0%	18.4%
$800 to $999	17.9%	14.7%
$1,000 to $1,499	24.0%	27.3%
$1,500 to $1,999	8.9%	14.4%
$2,000 to $2,499	4.2%	6.3%
$2,500 to $2,999	2.6%	3.3%
$3,000 or more	4.5%	4.2%
Median (dollars)	$938	$1,100

SEGREGATION

To gauge the levels of segregation in Dallas and the region, HUD provides a dissimilarity index, which is a conventional measure that assesses the degree of residential segregation between two groups. The higher the dissimilarity index value, the greater the level of segregation. The index value ranges from 0 to 100 where 0 to 39 indicate segregation, 40 to 54 moderate segregation and values from 55 to 100 a high level of segregation.

Summary data findings:

- Segregation levels in the region and within Dallas have increased for all racial/ethnic groups since 1990
- Regional level segregation generally remains lower than in Dallas with the exception of Asian or Pacific Islander/white segregation.
- Segregation black/white is the most severe in both the region and Dallas.
- In the Dallas-Fort Worth region, nonwhite residents disproportionately concentrate in the Dallas and Tarrant Counties.
- Dallas is characterized by sharp spatial patterns of segregation with a stark north/south divide and a disproportionate concentration nonwhite residents in the southern sector (up to 40% greater nonwhite population)
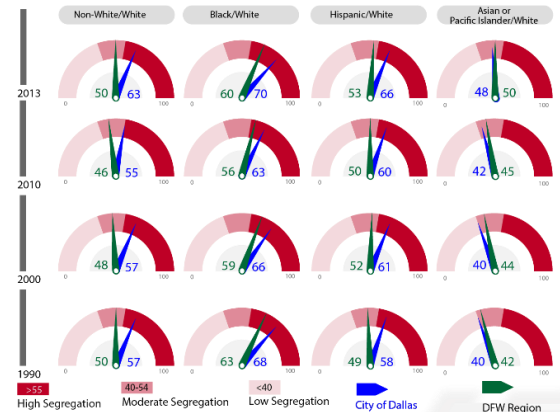
Dissimilarity Index, HUD
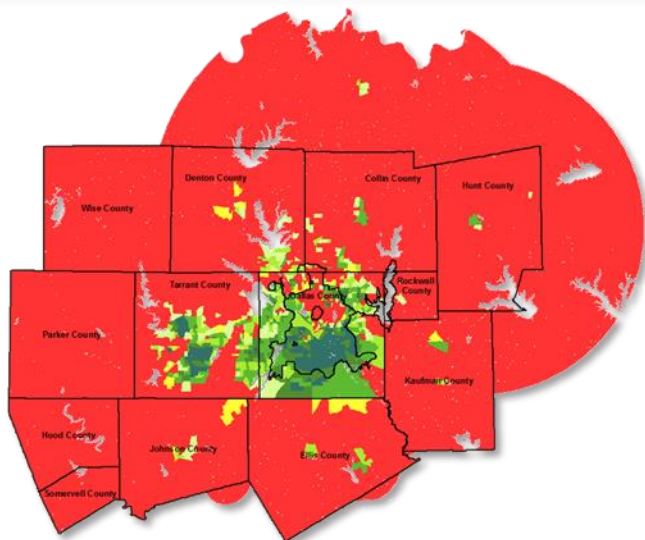
Segregation patterns, North Texas (2015)
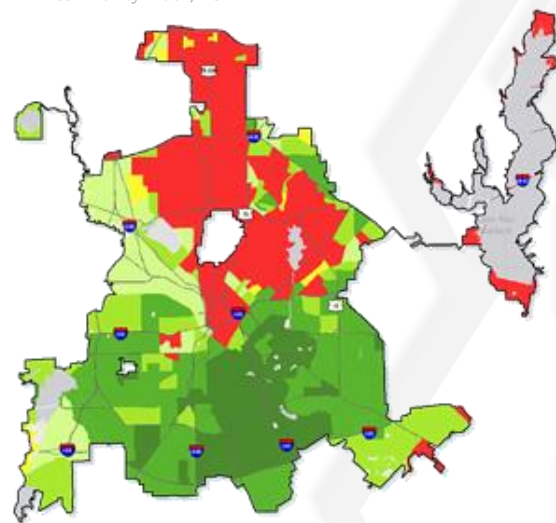
Segregation patterns, Dallas (2015)

Segregation Grade

- Greater white population share
- Same as jurisdiction average
- 0 to <10% greater than jurisdiction avg
- 10 to <20% greater than jurisdiction avg
- 20 to <30% greater than jurisdiction avg
- 30 to <40% greater than jurisdiction avg
- More than 40% greater than jurisdiction avg

4
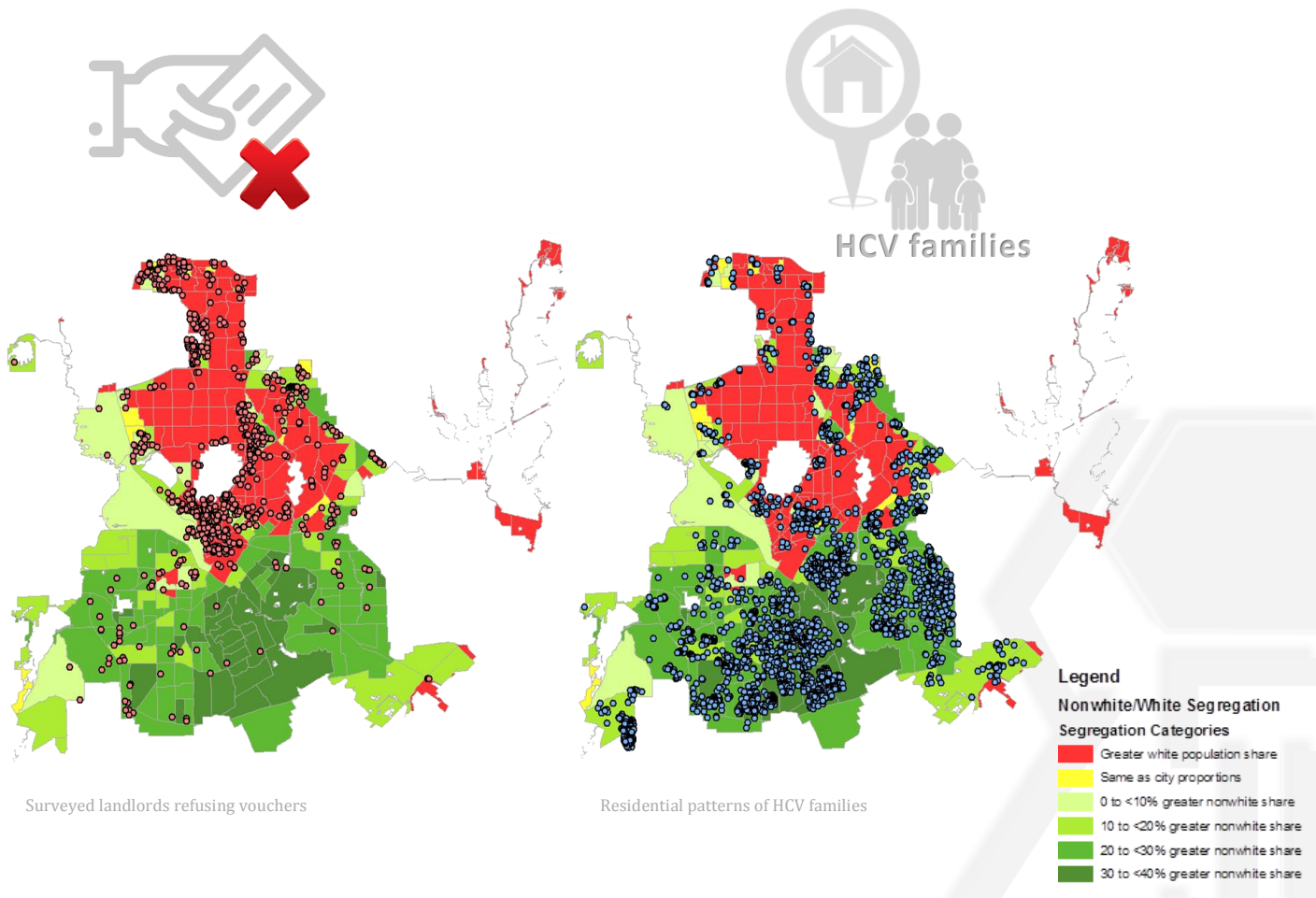
SOURCE OF INCOME DISCRIMINATION

Market constraints, the ability to use and access information, and discrimination affect the capability of Housing Choice Voucher (HCV) families to secure housing in integrated, opportunity-rich neighborhoods.

HCV families tend to be disproportionately members of protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. Thus, source of income discrimination against HCV families, in addition to hindering residential integration, has the potential of being illegal because it disproportionately harms members of protected classes (Tighe, Hatch and Mead 2017).

Daniel and Beshara, P.C., conducted a survey of private market-rate multifamily apartment complexes in Dallas to gauge the participation rate of landlords in the HCV program.

Summary data findings:

- Over 1,300 landlords within Dallas were surveyed
- 87% surveyed landlords refuse vouchers
- Surveyed landlords refusing vouchers disproportionally located in predominantly white neighborhoods
- Correspondingly, HCV families disproportionally locate in non-white, segregated neighborhoods

Surveyed landlords refusing vouchers

Residential patterns of HCV families

HCV families

Legend

Nonwhite/White Segregation

Segregation Categories

- Greater white population share
- Same as city proportions
- 0 to <10% greater nonwhite share
- 10 to <20% greater nonwhite share
- 20 to <30% greater nonwhite share
- 30 to <40% greater nonwhite share

5

HOME MORTGAGE DISCLOSURE ACT (HMDA), 2016

The HMDA is implemented by the Consumer Financial Protection Bureau's Regulation C, mandating that financial institutions report on loans, applications and other information.
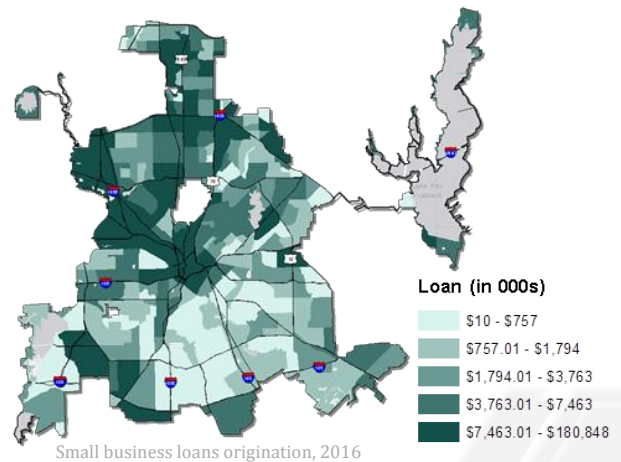
Summary data findings:

- White households represent a substantially higher share of all loan applicants in Dallas County and the region.
- Credit history is a preeminent reason for denial respectively for black and Native American households in Dallas County.
- Debt-to-income ratio is a dominant reason for loan denial for white and Asian/Pacific Islander households in Dallas County.
- For all racial groups except for black households, the majority of accepted loans are for home purchasing.
- For black households, the majority of accepted loan applications are for refinancing. A lower share of accepted applications is for home purchases.

COMMUNITY REINVESTMENT ACT (CRA)

The Community Reinvestment Act (CRA) was enacted by Congress in 1977 (12 U.S.C. 2901) to **prevent redlining and encourage banks to provide financial services that meet the needs of** the entire community, including **meeting the needs of residents in low- and moderate-income neighborhoods.**

Summary data findings:

- Thirty-nine percent of Dallas County CRA loans went to businesses located in census tracts where family incomes are greater than 120% of the area median income for the DFW MSA.
- Around 15% of CRA dollars went to communities with median incomes below 50% of area median income.
- Significantly fewer CRA dollars are going to lower income census tracts predominantly populated by nonwhite households.


Loan (in 000s)

$10 - $757
$757.01 - $1,794
$1,794.01 - $3,763
$3,763.01 - $7,463
$7,463.01 - $180,848

Small business loans origination, 2016

% of Area Median Family Income	Loan Amount at Origination < $100,000	Loan Amount at Origination > $100,000 But < $250,000	Loan Amount at Origination > $250,000	Loans to Businesses with Gross Annual Revenues < $1 Million	TOTAL Dollars Loaned	TOTAL % of Dollars Loaned
Dallas County, TX	(Number in 1,000s)					Percent
10-20%	275	0	947	6	1,228	0.0
20-30%	2,334	1,181	4,011	2,841	10,367	0.3
30-40%	31,759	14,647	76,273	28,689	15,1368	4.9
40-50%	75,431	38,671	132,173	68,650	31,4925	10.3
50-60%	89,941	47,152	203,554	81,626	422,273	13.7
60-70%	47,467	17,423	56,663	39,751	161,304	5.3
70-80%	34,430	12,190	49,999	29,106	125,725	4.1
80-90%	62,866	24,814	101,086	64,385	253,151	8.2
90-100%	55,838	19,704	97,294	50,538	223,374	7.3
100-110%	35,143	11,043	28,193	31,768	106,147	3.5
110-120%	26,566	8,849	23,441	17,099	75,955	2.5
>= 120%	295,098	125,761	456,918	311,458	1,189,235	38.7
TOTAL	772,093	325,010	1,241,459	732,624	3,071,186	100%

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

To assist communities in identifying racially or ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. R/ECAPs must have a **nonwhite population of 50 percent** or more and a **poverty rate of 40 percent** or more (extreme poverty).

Summary data findings:

- Long-lasting R/ECAPs in southern sector of Dallas and West Dallas
- Proliferation of R/ECAPS over time

    - 1990: **18**
    - 2000: 18
    - 2010: 32
    - 2013: 33
    - 2015: 32
    - 2016: **36**

- Spatial dispersion of R/ECAPs across the city
- R/ECAPs tend to be characterized by not only extreme poverty but by racial segregation (highest segregation grades, nonwhite concentration above 90%)
- R/ECAPs tend to emerge as a result of poverty increase, as opposed to a nonwhite population increase

R/ECAPs

50% Non-white and 40% Household below Federal poverty line

R/ECAPs (1990 -2016), Dallas
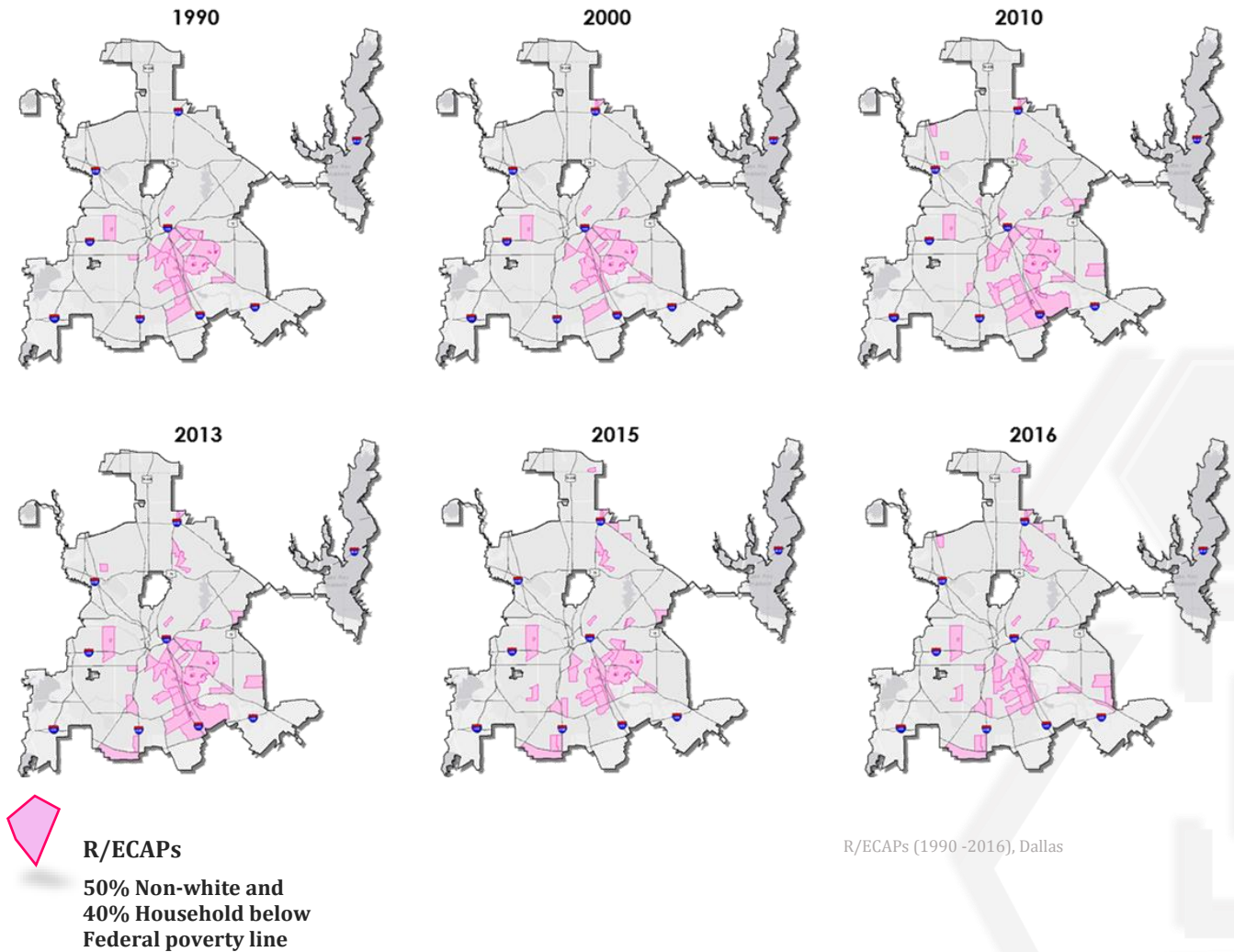
SOURCE OF INCOME DISCRIMINATION AND R/ECAPs

As of 2016, Dallas had 36 R/ECAP census tracts. An estimated 3,000, or 28%, of the HCV families residing in Dallas located in R/ECAPs, which represented an overall disproportionate concentration of HCV families in R/ECAP census tracts.

Summary data findings:

- Of the 380 census tracts in Dallas, 36 are R/ECAPs
- Thirty-six R/ECAP census tracts were home to 28% of all HCV families in Dallas, as of 2016
- The average number of HCV families is disproportionately greater in R/ECAPs (83 families) than in non-R/ECAPs (22 families) and in non-R/ECAPs with at least one HCV family (39 families).

Daniel and Beshara, P.C., conducted a survey of private market-rate multifamily apartment complexes in Dallas to gauge the participation rate of landlords in the HCV program.

Summary data findings:

- More than 91% of the 764 landlords refusing vouchers have properties outside R/ECAPs.
- The average poverty rate (17%) of the census tracts with landlord refusal remain far below R/ECAP classification.
- An average of 83 HCV families lives in each R/ECAP tract.
- Hypothetically, if each of these landlords would house three or four HCV families, no HCV family would reside within a R/ECAP

Surveyed landlords refusing vouchers overlaid with poverty rate (2016)

Residential patterns of HCV overlaid with poverty rate (2016)
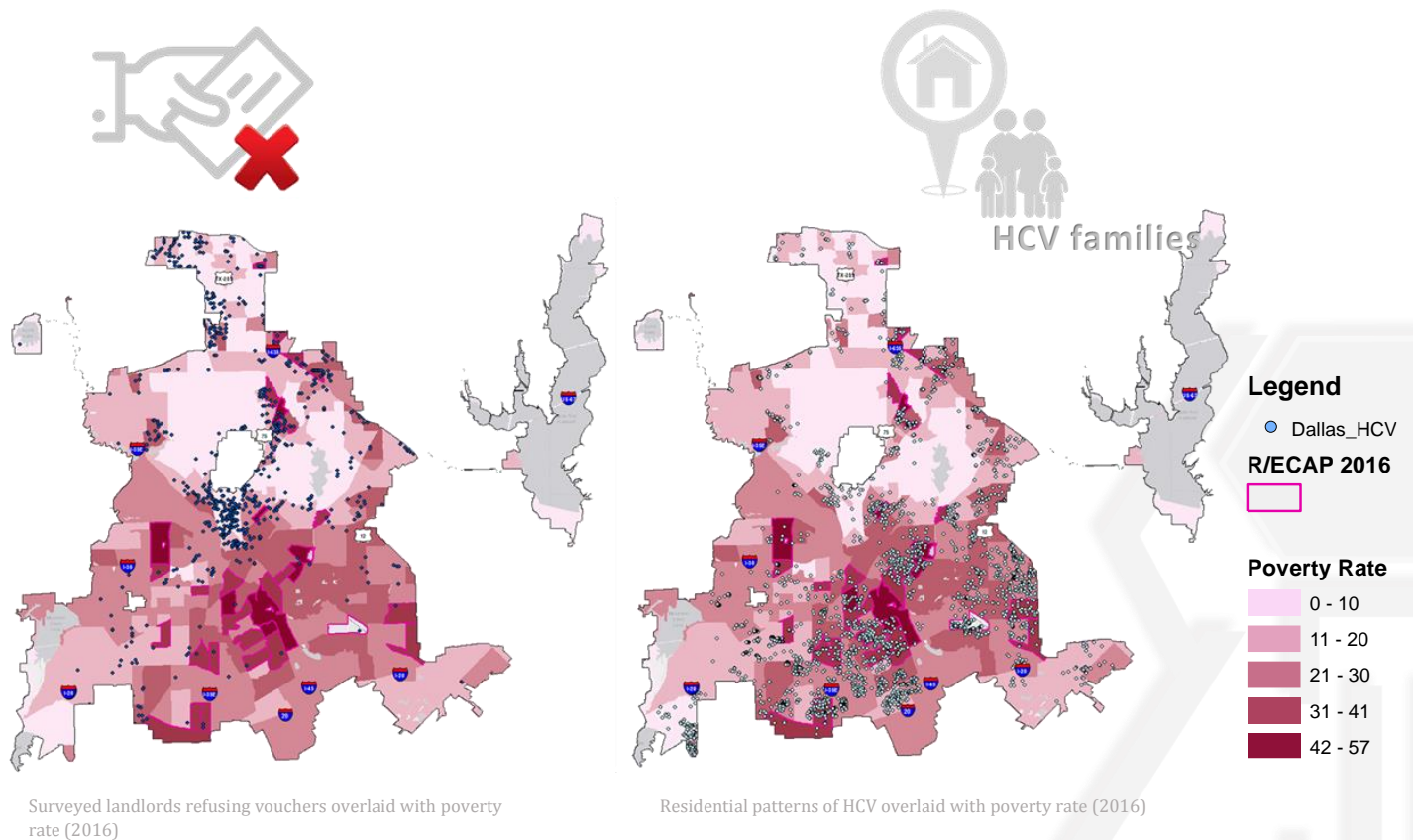
PUBLICLY SUPPORTED HOUSING AND R/ECAPs

The following infographics show the proportions of households with disability, families with children, and older adults across publicly supported housing developments within and outside R/ECAPs.

Summary data findings:
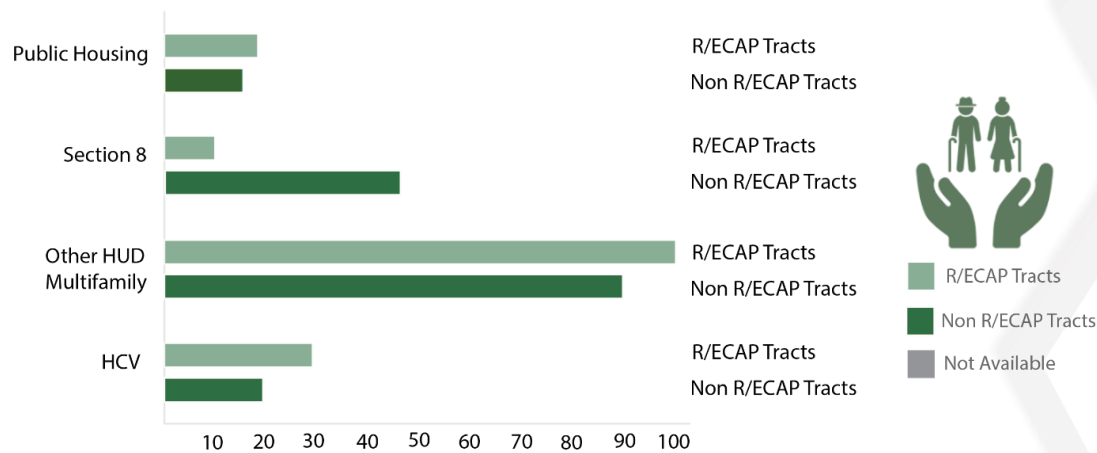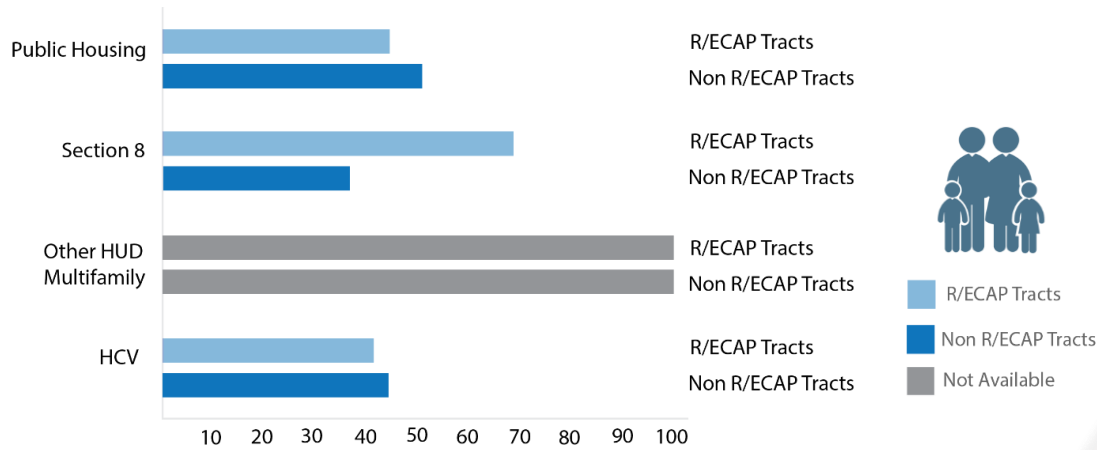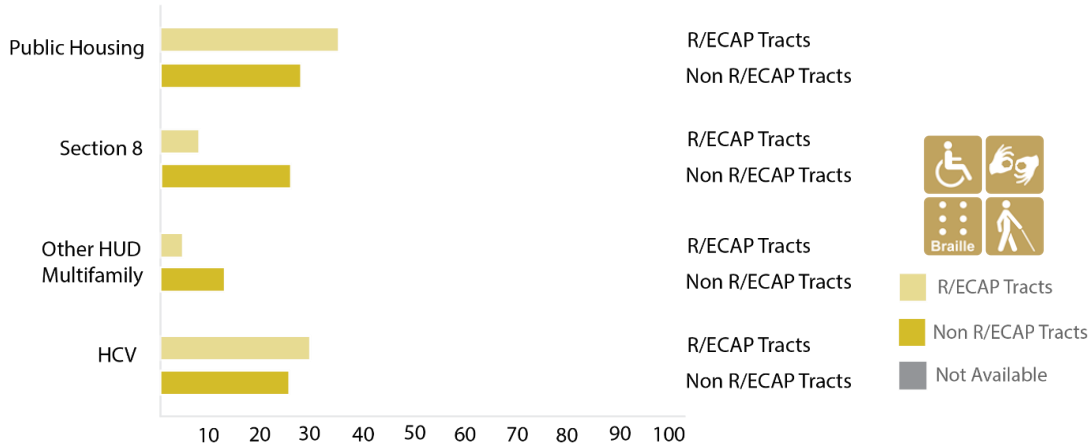
Percent of households with disability, families with children, and older adults across publicly supported housing developments within and outside R/ECAPs (source: HUD)

AFFORDABILITY PRESSURES

In 2018, the National Low Income Housing Coalition (NLIHC) released its "Out of Reach" report that documented the gap between renters' wages and the cost of rental housing. The report's **Housing Wage** was the hourly wage a full-time worker must earn to afford a modest rental home without spending more than 30% of his or her income on housing costs (source: NILHC website). The following key findings are based on NLIHC's Out of Reach report (2018).

Summary data findings

- In Texas, an individual working for minimum wage ($7.25/hour) needs to work 86 hours a week to afford a modest one-bedroom rental home
- A minimum wage earner in Texas and Dallas County can afford a **$377** rent
- A significant wage/cost-of-housing gap exists for low-income households in Texas and Dallas County
- **The housing wage remains greater in Dallas County ($20.71) than the state average ($19.32) and considerably larger than minimum wage ($7.25)** *[two-bedroom]*

#21 Texas | View State Map

State Facts

MINIMUM WAGE	$7.25
AVERAGE RENTER WAGE	$18.20
2-BEDROOM HOUSING WAGE	$19.32
NUMBER OF RENTER HOUSEHOLDS	3,542,096
PERCENT RENTERS	38%

Affordable Rent for Low Income Households

Minimum Wage Worker — $377/mo

Household at 30% of Area Median Income — $524/mo

Worker Earning Average Renter Wage — $946/mo

Fair Market Rent

1-Bedroom Fair Market Rent — $812/mo

2-Bedroom Fair Market Rent — $1,005/mo

Working at minimum wage $7.25/hr

Each <u>week</u> you have to work 86 HOURS!

To afford a modest 1 bedroom rental home at Fair Market Rent

Annual Income Needed to Afford

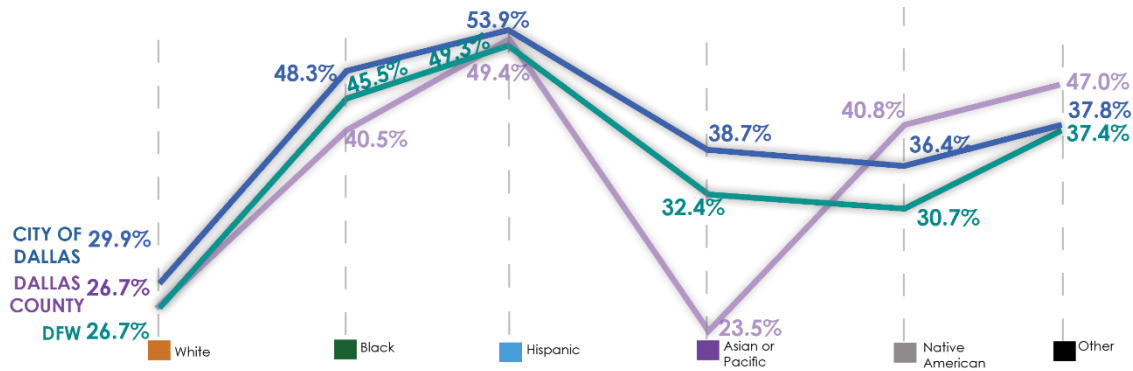|	Texas	Dallas County
ZERO-BEDROOM	$28,129	$29,200
ONE-BEDROOM	$32,489	$35,120
TWO-BEDROOM	$40,185	$43,080
THREE-BEDROOM	$54,280	$57,880
FOUR-BEDROOM	$67,204	$74,240

Source: National Low Income Housing Coalition (2018)

DISPROPORTIONATE HOUSING NEEDS

A household faces "**housing problems**" if it experiences one or more of the following: **housing cost burden** (defined as paying more than 30% of income for monthly housing costs, including utilities), **overcrowding** (more than one person per room), **lacking a complete kitchen**, or **lacking plumbing**.

Summary data findings:

- Overall, Dallas registers higher rates of housing problems than Dallas County and the DFW region
- Hispanic households tend to face housing problems at a higher rate than in other households
- Nonwhite households tend to face housing problems at a significantly higher rate than white households

Housing problems by race and ethnicity, Dallas/Dallas County/DFW

A household is considered **cost-burdened** if it spends more than 30% of its income towards housing and **severely cost-burdened** if housing consumes 50% or more of its income.

Summary data findings

- In Dallas, a substantially greater share of households at and below 30% and 50% HAMFI were cost burdened and severely cost burdened, compared to any other income group (2015).
- Renters suffer greater rates of cost burden and severe cost burden issues than owners
- Renters at and below 30 HAMFI experience the highest rates of cost burden and severe cost burden.
- About eight out of 10 renter families at 30% HAMFI face a housing cost burden in Dallas
- More than 95,000 renters and close to 30,000 owners with an income below 50% HAMFI were cost burdened in 2015.

Dallas, Texas (2015)					
Income by Cost Burden (Renters only)	**Cost burden > 30%**	**%**	**Cost burden > 50%**	**%**	**Total**
Household Income less-than or= 30% HAMFI	57,575	**79%**	46,910	**64%**	72,830
Household Income >30% to less-than or= 50% HAMFI	38,270	**75%**	10,020	**20%**	50,985
Household Income >50% to less-than or= 80% HAMFI	18,130	**32%**	2,490	**4%**	56,555
Household Income >80% to less-than or= 100% HAMFI	3,625	**14%**	380	**2%**	25,030
Household Income >100% HAMFI	3,170	**5%**	340	**0.5%**	70,000
Total	**120,770**		**60,140**		**275,395**
Income by Cost Burden (Owners only)	**Cost burden > 30%**	**%**	**Cost burden > 50%**	**%**	**Total**
Household Income less-than or= 30% HAMFI	15,860	**71%**	11,490	**51%**	22,425
Household Income >30% to less-than or= 50% HAMFI	14,095	**56%**	6,060	**24%**	25,105
Household Income >50% to less-than or= 80% HAMFI	11,655	**35%**	3,335	**10%**	33,530
Household Income >80% to less-than or= 100% HAMFI	4,080	**22%**	995	**5%**	18,925
Household Income >100% HAMFI	8,890	**9%**	1,520	**1%**	101,865
Total	**54,580**		**23,400**		**201,855**

HAMFI: HUD adjusted median family incomes

Housing cost burden information by income band, Dallas (2015)

R/ECAPs AND ACCESSIBILITY BARRIERS

In 2015, the U.S. Department of Agriculture (USDA) developed its second Food Access Research Atlas. It offered several food access measures at the census tract level combined with a measure of vehicle availability for all tracts (USDA, 2017). The atlas considers a census tract low access if a significant number (at least 500) or share of (at least 33%) individuals live far from a supermarket.

Summary data findings:

- About 56% of all R/ECAPs in Dallas (20 out of 36) also have low access to food.
- Conversely, 77% (20 out of 26) of the areas characterized by low access to food and vehicle availability also receive a R/ECAP designation.
- Census tracts with the greatest shares of housing units without a vehicle and beyond ½ mile from a supermarket correlate with R/ECAP and/or tend to be located in the southern sector of Dallas.
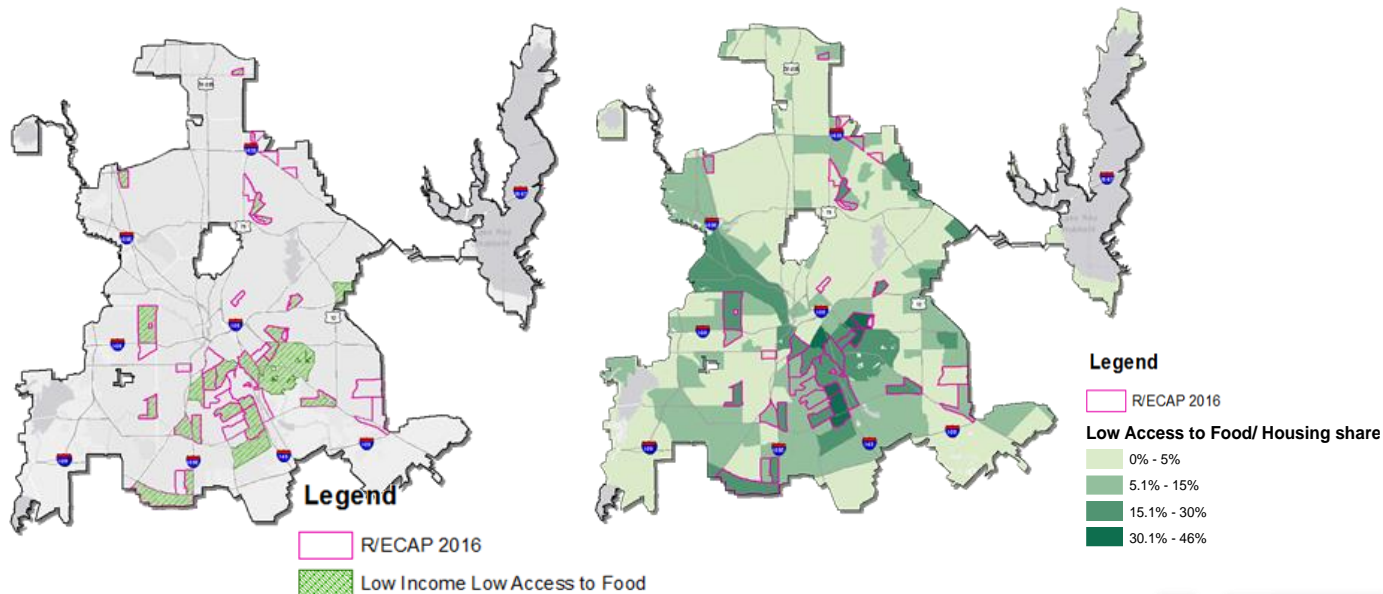
Low Income and Low Access census tract, Dallas (2015)

Share how housing with low access to supermarket, Dallas (2015)

PUBLIC TRANSPORTATION AND ACCESS TO JOBS

The Center for Neighborhood Technology (CNT) created an analytical platform using a wealth of transportation-related data to assess the performance, quality and impact of public transit (source: AllTransit). The following sets of maps show the number of jobs accessible within a 30-minute transit commute by workers with monthly earning greater than $3,333.

Summary data findings:

- Overall greater access in Dallas than in counterpart cities (i.e. Fort Worth, Garland, Plano…)
- Yet, jobs ($3,333/month) appear not equally accessible by transit within Dallas
- Relatively lower access to jobs occurs in southern Dallas and the previously identified R/ECAP census tracts
- An estimated 10% of households (46,627) who live near transit own no vehicles
- While more than 92% commuters live near transit (within half a mile), only 4.7% commute via public transportation
- Proximity to transit does not always translate into transit usage, or transportation affordability (Smart & Klein, 2018).
- A regional monthly transit pass costs $160
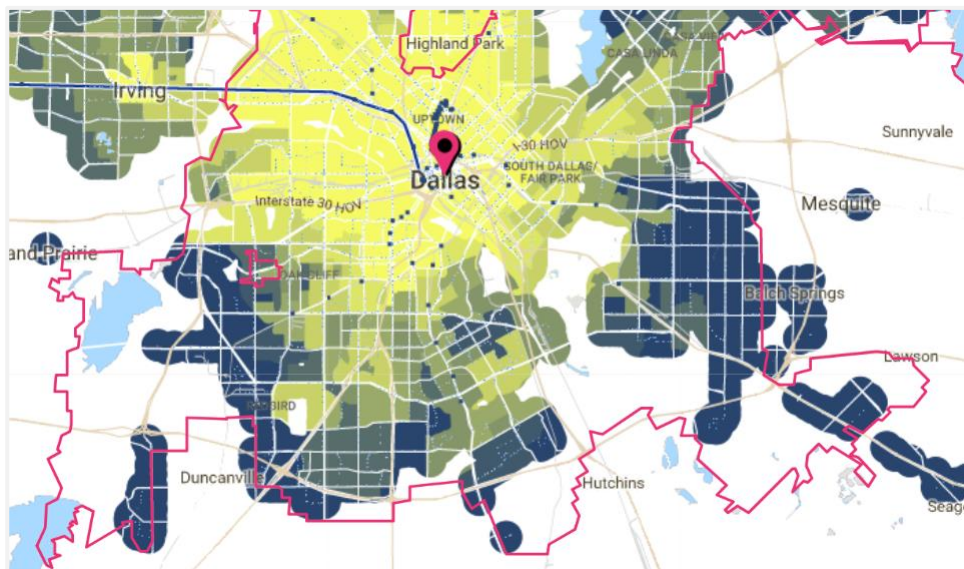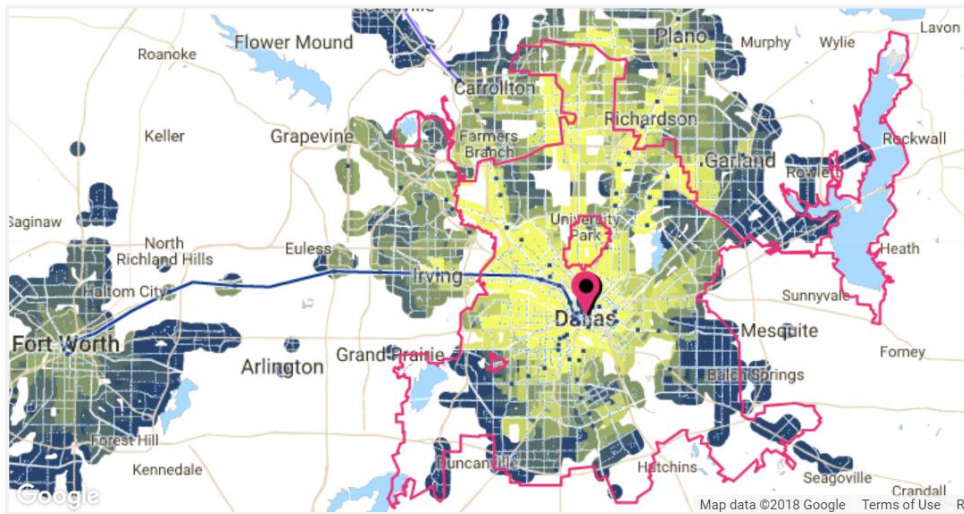
Number of jobs accessible within a 30 minute transit commute held by workers with earnings greater than $3333/month on average for households.

- ■ < 12,500 Jobs
- ■ 12,500-25,000 Jobs
- ■ 25,000-50,000 Jobs
- ■ 50,000-75,000 Jobs
- ■ 75,000-100,000 Jobs
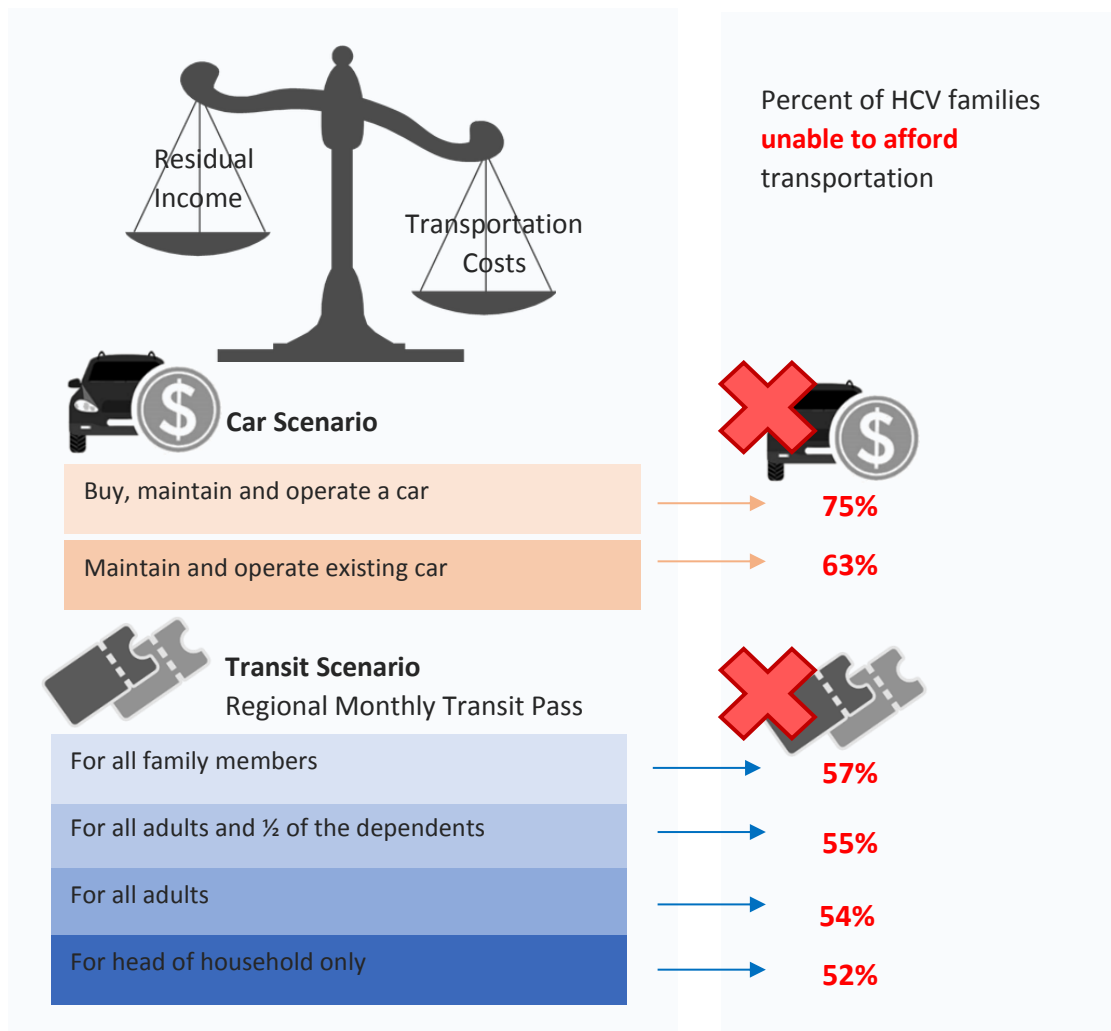- ■ 100,000-125,000 Jobs
- ■ 125,000-150,000 Jobs
- ■ 150,000 Jobs+

Source: Center for Neighborhood Technology, AllTransit

TRANSPORTATION AFFORDABILITY

A study conducted by Igoufe, Mattingly, and Audirac (2018) at the University of Texas at Arlington examined the extent to which HUD-assisted families (HCV) face cumulative barriers to affordable transportation options. The assessment looked at both private and public transportation options.

Summary data findings:

- A large share of HCV families face severe transportation affordability challenges that threaten their ability to meet basic needs and achieve upward mobility
- After meeting non-transportation needs (food, childcare, health care, housing…), results show that about 75% of HCV families cannot afford to buy, maintain and operate a car
- Close to six out of 10 families cannot afford a regional monthly transit for their family
- While some families reside near transit, a majority do not have sufficient resources to travel via transit, even when only the head of household needs to commute.
- Study offers insight on barriers to self-sufficiency faced by the extremely and low-income population in DFW.

Percent of HCV families **unable to afford** transportation

Car Scenario

Buy, maintain and operate a car	**75%**
Maintain and operate existing car	**63%**

Transit Scenario
Regional Monthly Transit Pass

For all family members	**57%**
For all adults and ½ of the dependents	**55%**
For all adults	**54%**
For head of household only	**52%**

Source: Igoufe, Mattingly, and Audirac (2018)

INEQUITIES IN ACCESS TO OPPORTUNITY

To assess disparities in access to opportunity, HUD provided seven opportunity indices (Low Poverty, School Proficiency, Labor Market, Transit, Low Transportation Cost, Jobs Proximity, and Environmental Health indices). Four overarching patterns emerged.

Summary data findings:

- From a regional perspective, suburbs tend to outperform Dallas (and Fort Worth area) across all but transportation-related indices. Correspondingly, the region tends to outperform Dallas.
- In Dallas, stark inequities exist across groups. Low-income, nonwhite, Limited English Proficiency, foreign-born populations as well as individuals with disability and families with children tend to have significantly lower access to opportunity compared to their counterparts.
- Spatially, the disparities across population groups follow the identified segregated residential patterns, along both economic and racial/ethnic lines.
- The stark geography of inequity and segregation compounds the fair housing challenges faced by vulnerable populations

Labor Market Engagement Index provides a description of the relative intensity of labor market engagement and human capital in a neighborhood.

The following map shows the geography of the index. The table shows the distribution of each population groups across low and high-performing census tracts.

Legend
Dallas_Highways
0.0 - 20.0
20.1 - 40.0
40.1 - 60.0
60.1 - 80.0
80.1 - 100.0
Null

0   Index Score   100

Spatial patterns: Labor Market Engagement Dallas
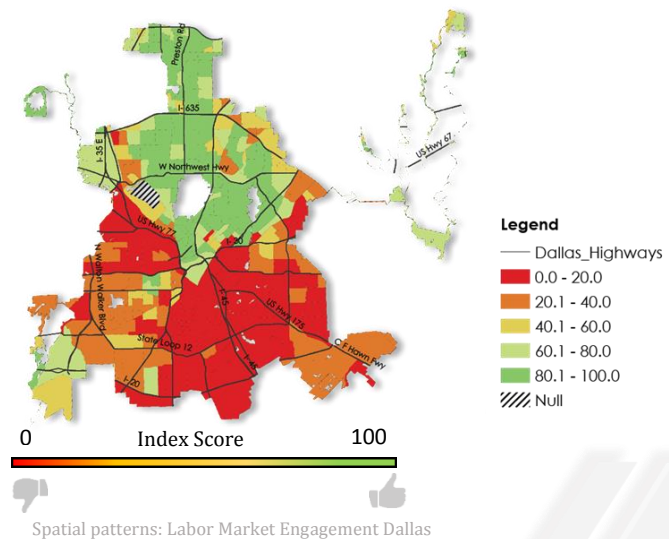
Labor Market Engagement Score across groups, Dallas

Dallas Index Score	Number census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	36	1.4	20.5	8.1	0.7	15.4	10.5	7.2	7.8	6.3	7.0	12.6
10-19	40	3.7	21.2	17.2	2.9	17.6	15.0	12.4	15.5	13.3	12.0	17.0
20-29	33	3.1	9.2	17.9	5.3	12.0	12.6	11.9	19.7	16.3	11.8	10.0
30-39	35	5.5	10.7	16.4	6.8	11.8	13.7	12.7	16.6	14.9	11.8	11.4
40-49	22	3.7	5.5	10.3	7.0	7.7	9.6	8.8	11.1	10.6	7.6	5.7
50-59	25	6.6	7.9	7.8	6.7	5.9	7.3	8.7	7.0	7.1	7.6	7.3
60-69	32	9.7	7.6	6.4	12.6	6.6	7.9	8.3	7.4	7.4	8.1	7.7
70-79	33	14.3	7.9	5.5	12.5	5.3	7.1	8.4	4.5	6.4	10.1	8.9
80-99	36	15.1	4.0	5.0	12.1	6.7	5.8	7.0	4.9	7.0	8.7	6.8
90-100	87	37.0	5.5	5.5	33.2	10.9	10.5	14.6	5.4	10.6	15.3	12.6

LOCATIONAL PATTERNS OF PUBLICLY SUPPORTED HOUSING

In Dallas, black households represent the majority of participants in the HCV (88%) and public housing (78%) programs. While representing a lesser share, black households remain the dominant group in Section 8 (67%) and other multifamily programs (47%). Hispanic households make up the second largest group in other multifamily programs (24%) and the third largest group (13%) in the project-based section 8 programs, after white households (16%). Asian or Pacific Islander households participate at a greater rate in the other multifamily program, as opposed to the HCV or public housing programs.
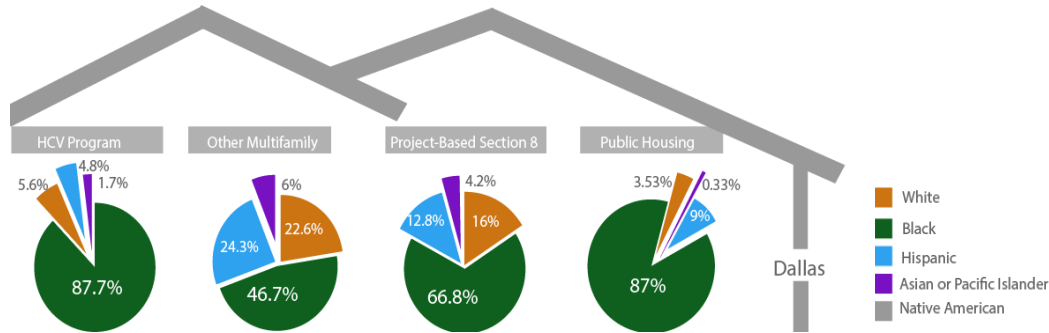
Racial/ethnic composition of publicly supported housing programs, Dallas (source: HUD)

Averages by race and ethnicity, median income of census tract in which developments/families are located						
	HCV Program	LITHC	Section 202	Section 811	Project-Based Section 8	Public Housing
White	12%	17%	14%	11%	13%	24%
Black	45%	34%	56%	17%	38%	33%
Hispanic	39%	45%	28%	66%	49%	98%
Asian or PI	2.2%	2.3%	1.2%	4.3%	1.9%	4.3%
Native American	0.1%	0.1%	0.1%	0%	0.1%	0.05%
Median Income	$40,155	$30,932	$35,918	$31,823	$31,958	$33,689
Total	10,531	159	9	3	25	16

The average neighborhood racial and ethnic composition for each program does not perfectly reflect (in proportion) the composition of each program, although developments and families tend to be located in mostly nonwhite neighborhoods (proportion greater than city average).

Average opportunity index score						
Index	HCV Program	LITHC	Section 202	Section 811	Project-Based Section 8	Public Housing
Low Poverty	**16**	**13**	**16**	**13**	**14**	**21**
Environmental Health Hazard	**28**	**27**	**26**	**26**	**28**	**31**
Labor Market Engagement	**28**	**31**	**24**	**30**	**31**	**39**
Job Index	**44**	**54**	**51**	**67**	**44**	**59**
School Index	**29**	**29**	**36**	**34**	**23**	**39**
Transportation Cost	**73**	**77**	**68**	**83**	**71**	**77**
Transit	**56**	**58**	**53**	**60**	**54**	**56**

Overall, HCV families and developments tend to register comparable low scores across opportunity indices, with relatively higher scores for job (50s-60s) and transportation-related (70s-80s) indices.
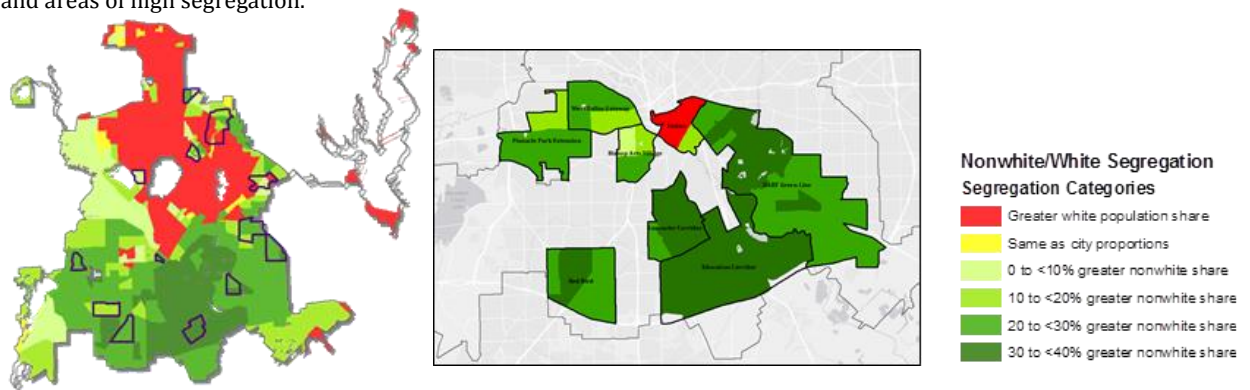
OVERVIEW OF GEOGRAPHIC STRATEGIES/PLACE-BASED INVESTMENTS

Location matters. For purposes of the rule, **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 and ethnically concentrated areas of poverty into areas of opportunity**, and fostering and maintaining compliance with civil rights and fair housing laws.

SEGREGATION:

Neighborhood Plus Plan: The designated Neighborhood Plus Plan focus areas greatly vary in racial/ethnic composition. Several designated areas respectively cover predominantly white areas, and census tracts with a nonwhite population share less than 10% greater than city average. A few other designated areas encompass census tracts with a nonwhite population share between 20% and 30% greater than city average.

GrowSouth Initiative: Given the clustering of highly segregated neighborhoods in the southern sector of Dallas and the intentional geographical focus of the GrowSouth (GS) initiative, great overlap exists between the GS designated focus areas and areas of high segregation.

Nonwhite/White Segregation
Segregation Categories
- Greater white population share
- Same as city proportions
- 0 to <10% greater nonwhite share
- 10 to <20% greater nonwhite share
- 20 to <30% greater nonwhite share
- 30 to <40% greater nonwhite share

Overlay Neighborhood Plus (left) and GrowSouth (right) focus areas with segregation patterns (2015)

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY:

Neighborhood Plus Plan: Little overlap exists between the designated NP focus areas and areas of high poverty and minority concentration (R/ECAPs). The poverty rate of all NP focus areas (except Pemberton Hills) remains significantly lower than R/ECAPs (at least 40%).

Neighborhood Plus Focus Areas Overlapping with R/ECAPs	Number of R/ECAPs at least partially within NP areas in 2015	Number of R/ECAPs at least partially within NP areas in 2016	Average Poverty Rate (2016)	Average Nonwhite concentration (2016)
The Bottom	1		26%	31%
Vickery Meadow	2	2	33%	43%
Pemberton Hills	1	1	41%	53%
Family Corridor	1	1	24%	50%
Coit/Spring Valley	2	2	30%	73%
Elm Thicket-Northpark			9%	49%
Bonnie View			27%	87%
Kiest Cliff/Kimball Heights			28%	46%
Red Bird			28%	76%
Casa View			20%	46%
Skyline			28%	46%
Arcadia Park			27%	21%
Pleasant Grove			24%	39%
Total	**7 (out of 32)**	**6 (out of 36)**	**26%**	**50%**

Legend
- Neighborhood Plus Focus Areas
- **R/ECAP**
- Yes
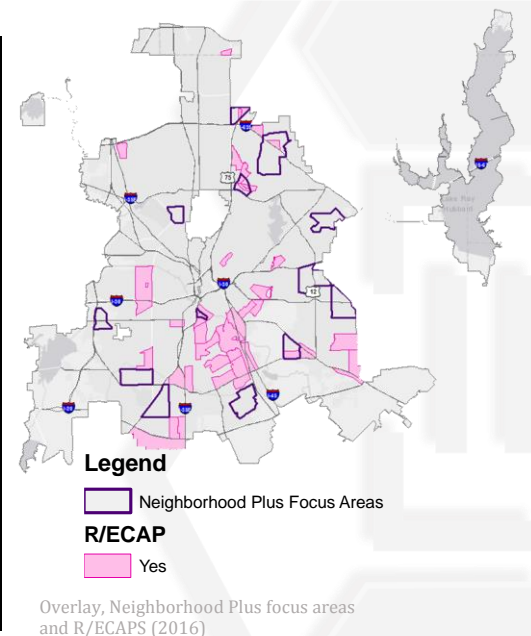
Overlay, Neighborhood Plus focus areas and R/ECAPS (2016)

GrowSouth Initiative: Substantial overlap exists between the GS designated focus areas and R/ECAPs. An estimated nine R/ECAPs are contained (even partially) within GS focus areas. The average poverty rate of GS focus areas is lower than the one of R/ECAPs (at least 40%).
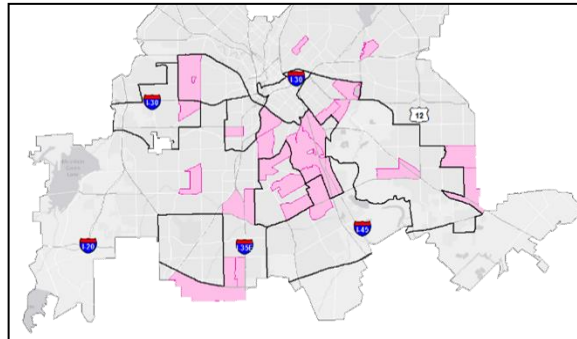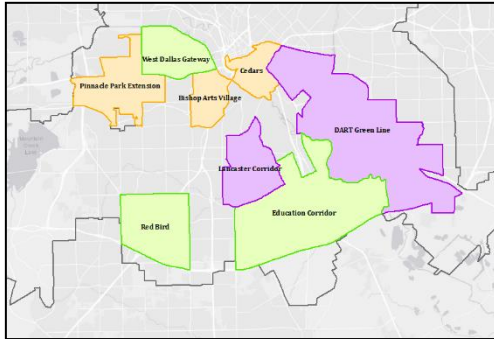

Overlay GrowSouth (right) focus areas and R/ECAPS (2016)

GrowSouth Focus Area	Number of R/ECAPs within GS focus area	Average nonwhite population	Average poverty rate
Pinnacle Park Expansion	0	92%	30%
North Oak Cliff (Bishop Arts Village)	0	85%	27%
Greater Downtown/Cedars	0	61%	33%
Education Corridor	1	98%	29%
Red Bird	0	97%	24%
West Dallas Gateway	1	87%	**36%**
Lancaster Corridor	3	98%	**38%**
Dart Green Line	4	94%	35%
Total	9	93%	32%

Housing Policy targeted areas: Little overlap exists between targeted areas and existing R/ECAPs. Similarly, the poverty rate of these targeted areas remains lower than R/ECAPs (at least 40%).

MAP ID	NAME	TYPE	R/ECAP Overlap?	Poverty Rate	Percent Nonwhite
1	LBJ – Skillman	Stabilization	Complete	30%	79%
2	Vickery Meadow	Stabilization	Complete	30%	65%
3	Casa View	Stabilization	No	**18%**	**66%**
4	East Downtown	Stabilization	No	26%	50%
5	The Bottom	Stabilization	Substantial	31%	75%
6	Forest Heights	Stabilization	Partial	34%	94%
7	Red Bird	Stabilization	No	23%	89%
8	West Dallas	Stabilization	Slight	36%	87%
9	Midtown	Redevelopment	No	**17%**	**62%**
10	High Speed Rail	Redevelopment	No	31%	68%
11	Wynnewood	Redevelopment	No	23%	90%
12	Red Bird	Redevelopment	No	34%	95%
13	University Hills	Emerging Market	No	23%	97%
14	Pleasant Grove	Emerging Market	Partial	37%	93%
15	Southern Gateway	Emerging Market	Partial	31%	89%
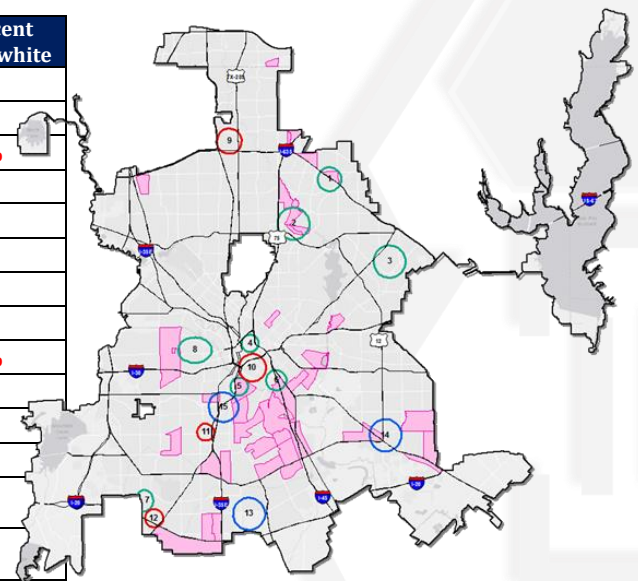
Overlay Housing Policy focus areas and R/ECAPS (2016)

18

OVERVIEW CONTRIBUTING FACTORS TO FAIR HOUSING ISSUES

Comments received from public meetings, focus groups, stakeholder or subject matter expert interviews and consultations were analyzed and coded according to the list of contributing factors initially set forth by HUD. Related contributing factors were grouped to identify trends. Top 5 contributing factors to fair housing issues in Dallas are as follow:

Contributing Factors of Disparities in Access To Opportunity	363	
Lack of public investments in specific neighborhoods, lack of private investment, crime	88	24%
Source of income discrimination, private discrimination, lending discrimination, access to financial services, impediments to mobility	48	13%
Availability, type, frequency and reliability of public transportation	47	13%
Location of proficient schools and school assignment policies	47	13%
Lack of access to opportunity due to high housing costs, loss of affordable housing, location and type of affordable housing	41	11%

Contributing Factors of Segregation	196	
Community Opposition, source of income discrimination, private discrimination, lending discrimination	59	30%
Loss of Affordable Housing, Displacement of Residents due to economic pressures, location and type of affordable housing	51	26%
Lack of Public Investments in Specific Neighborhoods	40	20%
Lack of regional cooperation	19	10%
Land Use and Zoning Laws	18	9%

Contributing Factors of Disproportionate Housing Needs	195	
Availability of Affordable Units in Range of Size, Loss of affordable housing, displacement due economic pressures, access to opportunity, high housing costs, rising rents	68	35%
Lack of Public Investments in Specific Neighborhoods, lack of private investments, lack of police protection or visibility in neighborhood	36	18%
Housing Problems, older homes need expensive repairs, landlords failing to maintain property	31	16%
Source of Income Discrimination, lending discrimination, eviction and criminal background	28	14%
Other, building code and regulation, lack of awareness	18	9%

Contributing Factors of R/ECAPs	169	
Lack of Public Investments in Specific Neighborhoods, lack of private investments, lack of community revitalization strategies, deteriorated and abandoned properties	65	38%
Location and Type of Affordable Housing, loss of affordable housing, displacement of residents due to economic pressure	45	27%
Source of Income Discrimination, community opposition, private discrimination	29	17%
Lack of Local or Regional Cooperation	10	6%
Land Use and Zoning Laws	9	5%

Contributing Factors of Publicly Supported Housing Location and Occupancy	128	
Siting Selection Policies, Practices and Decisions for Publicly Supported Housing, Including Discretionary Aspects of Qualified Allocation Plans and Other Programs, community opposition, impediments to mobility, income discrimination	35	27%
Lack of Access to Opportunity Due to High Housing Costs, loss of affordable housing, displacement due to economic pressures	28	22%
Quality of Affordable Housing Information Programs	14	11%
Lack of Public Investment in Specific Neighborhoods, lack of private investment	13	10%
Lack of Local or Regional Cooperation	11	9%

Disability and Access Issues Contributing Factors	92	
Lack of Affordable, Integrated Housing, accessible housing, in-home services and community service for Individuals Who Need Supportive Services in a range of sizes	24	26%
Access to Transportation for Persons with Disabilities	12	13%
Loss of Affordable Housing, lack of access to opportunity due to high housing costs	9	10%
State/Local Laws, Policies, Practices that Discourage Individuals W/Disabilities Living in Apartments, Family Homes, Supportive Housing, Shared Housing and Other Integrated Settings, access to publicly supported housing	9	10%
Regulatory Barriers to Providing Housing and Supportive Services for Persons With Disabilities	8	9%

Fair Housing Enforcement	10	
Resources (Staff, Budget, etc.) for Fair Housing Enforcement Agencies and Organizations	3	30%
Local Education and Fair Housing Enforcement by Private Housing Providers (Real Estate Agents, Builders, etc.)	2	20%
Local Fair Housing Enforcement by Agencies and Government	2	20%
Resolution of Violations of Fair Housing or Civil Rights Law	2	20%
State or Local Fair Housing Laws	0	0%

NORTH TEXAS REGIONAL HOUSING ASSESSMENT
DALLAS CITY COUNCIL BRIEFING
NOVEMBER 6, 2018

Dr. Myriam Igoufe
Co-Principal Investigator and Project Manager

Dr. Stephen Mattingly,
Principal Investigator

PRESENTATION OVERVIEW

- Background, Structure, and Purpose

- Key Findings

- Fair Housing Goals

- Moving Forward

ASSESSMENT OF FAIR HOUSING

- Requirement set forth by HUD in 2015 pursuant to new rule on **Affirmatively Furthering Fair Housing**

  o Data-driven examination
  o Regional collaboration

- North Texas working group formed (21 entities), led by the City of Dallas
- UT Arlington retained as a consultant in January 2017

STRUCTURE

Assess Disparities:
Among groups, Dallas/Region

FAIR HOUSING ISSUES
SEGREGATION
RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY
HOUSING NEEDS
ACCESS TO OPPORTUNITY
DISABILITY & ACCESS TO HOUSING
PUBLICLY SUPPORTED HOUSING
FAIR HOUSING ENFORCEMENT

HUD data

Supplemental Data

Outreach

Place-based investments/ Policies

Quantitative Analysis

FAIR HOUSING GOALS

PURPOSE

- For the City of Dallas to be better positioned to Affirmatively Further Fair Housing

  - o Address inequities (segregation, poverty…)
  - o Remove obstacles to access to opportunity
  - o Integrated and balanced living patterns

- "The duty to affirmatively further fair housing **extends to all of a program participant's activities and programs relating to housing and urban development**."

- Five-year Consolidated Plan (August 2019)

AFFIRMATIVELY FURTHERING FAIR HOUSING

For purposes of the rule, **affirmatively furthering fair housing** "specifically, 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 and 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 of a program participant's activities and programs relating to housing and urban development**."
(Source: HUD, 2017)

KEY FINDINGS

- REGION
  - Persisting patterns of segregation
  - Racial/ethnic inequities
  - Affordability Pressures
  - Dallas/Region imbalances

KEY FINDINGS, DALLAS

Stark geography of inequity

- o Growing racial/ethnic and economic segregation
- o Racial/ethnic inequities
- o Affordability pressures
- o Dallas/Region imbalances
- o Systemic barriers to access opportunities

Compounding effects of inequitable geography
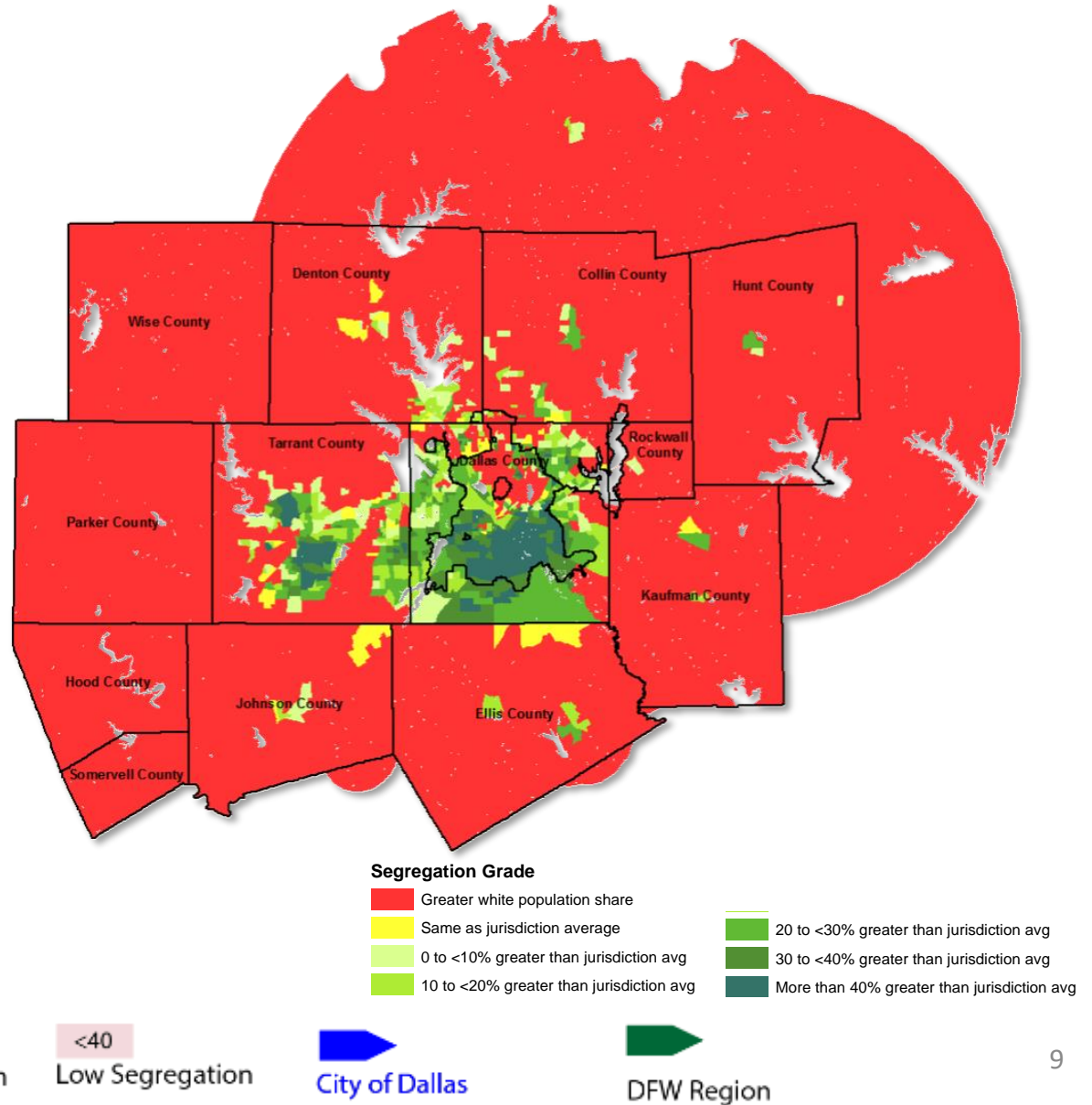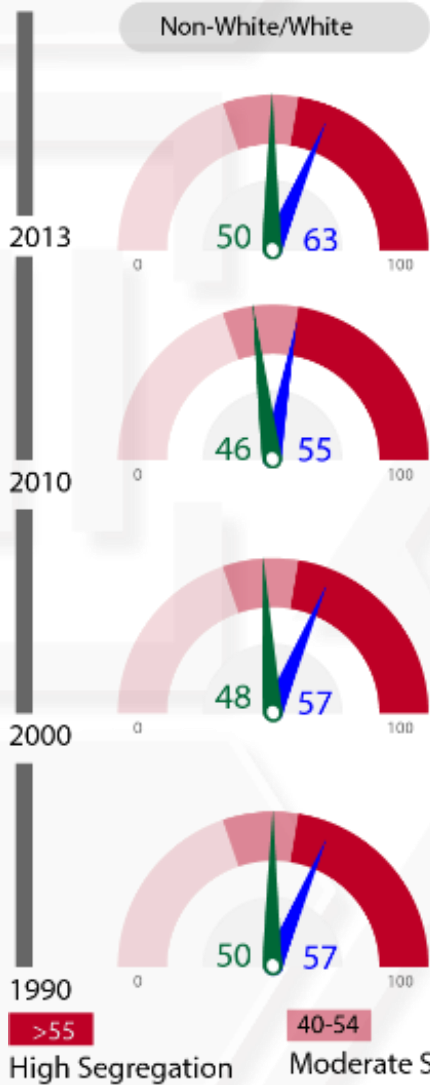
SEGREGATION, NORTH TEXAS

SEGREGATION, NORTH TEXAS
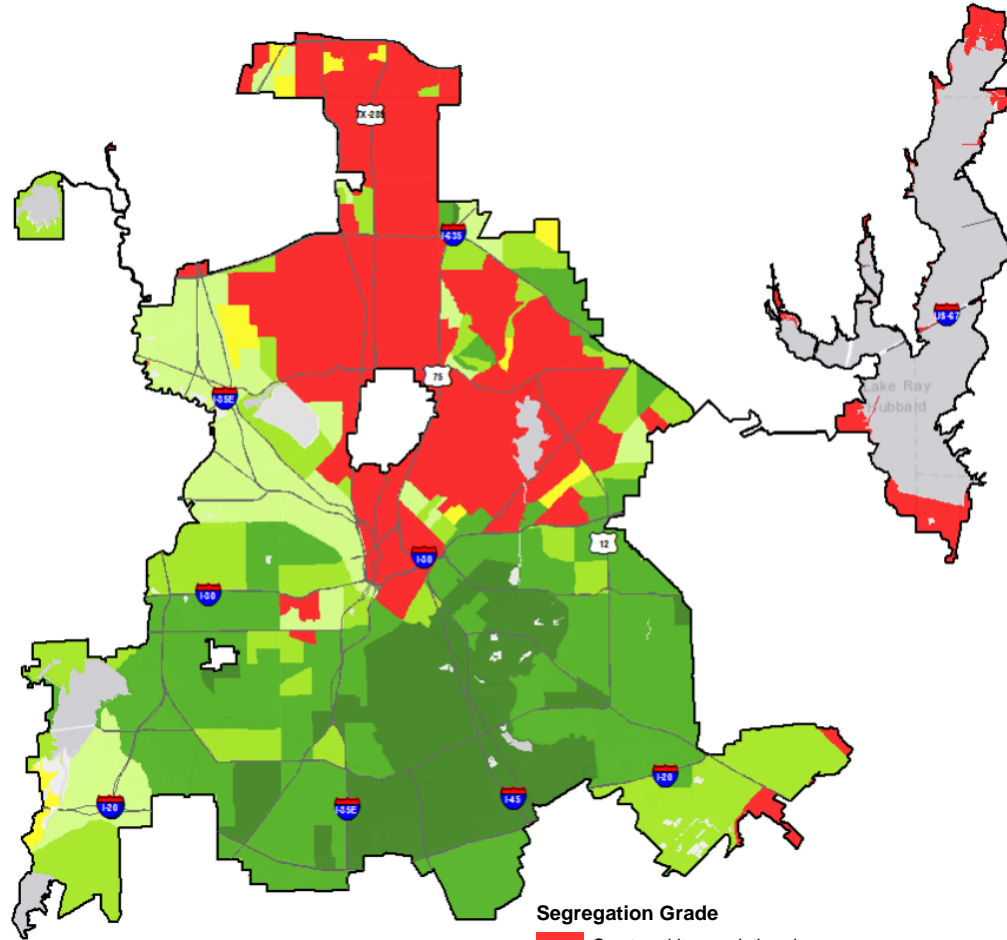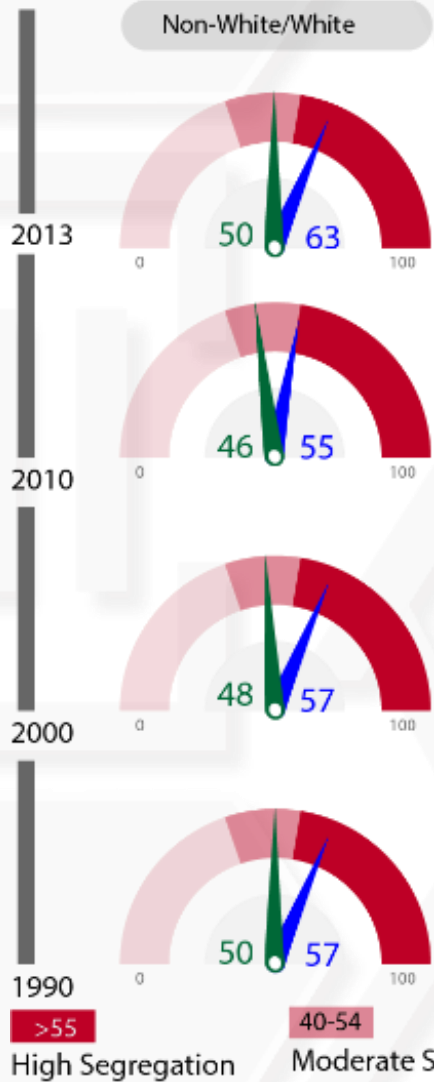
Source: U.S. Census Bureau, 1990, 2000, 2010 American Community Survey

10

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

R/ECAPs

50% Non-white and 40% Household below Federal poverty line
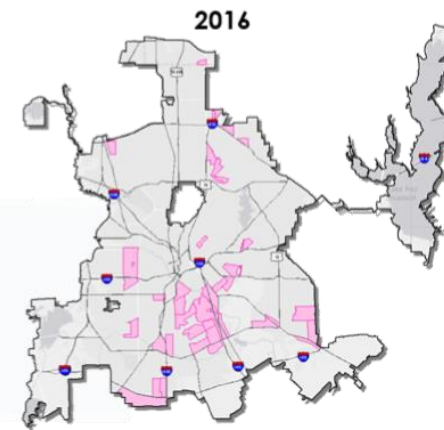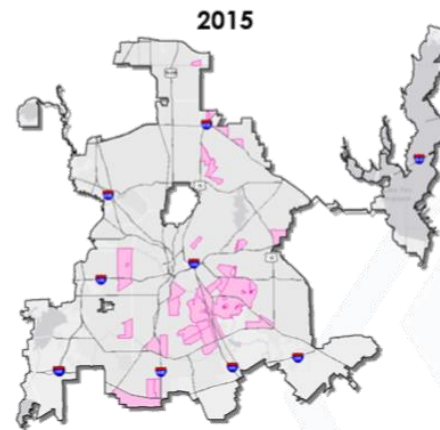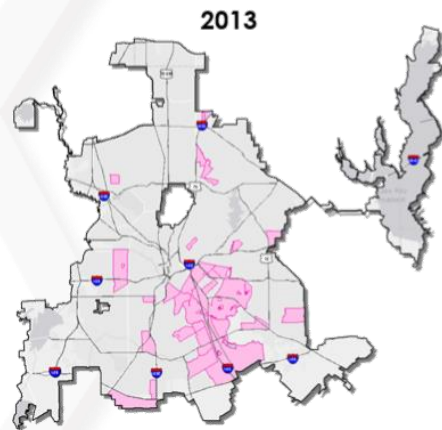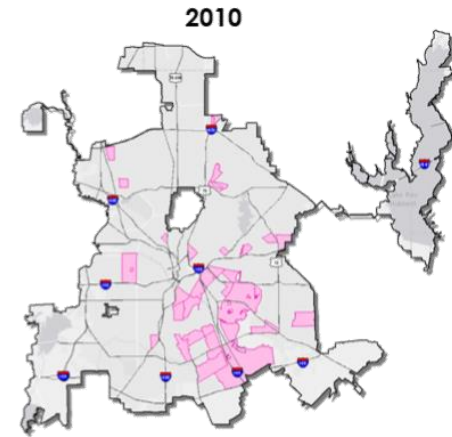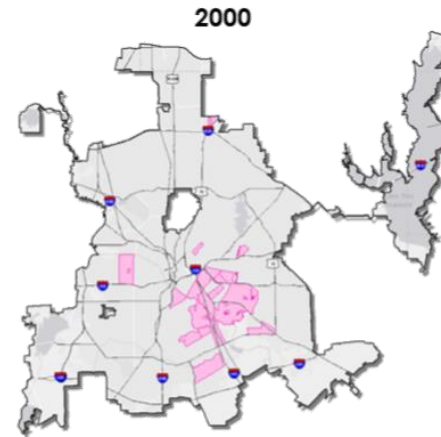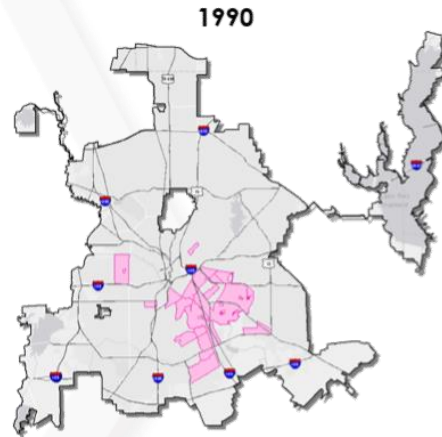
RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

- Long-lasting R/ECAPs in Southern sector of Dallas and West Dallas

- Proliferation of R/ECAPs over time

  1990: (18)   2000: (18)   2010: (32)
  2013: (33)   2015: (32)   2016: (36)

- Spatial dispersion of R/ECAPs across the city and region

- Segregation ~~Nonwhite concentration~~

- R/ECAPs tend to emerge as a result of poverty increase, as opposed as to a nonwhite population increase.

R/ECAPs
50% Non-white and 40% Household below Federal poverty line

Legend

— DallasHighways

R/ECAP
How many years?

- 6
- 5
- 4
- 3
- 2
- 1

R/ECAPs (2016**)**

12
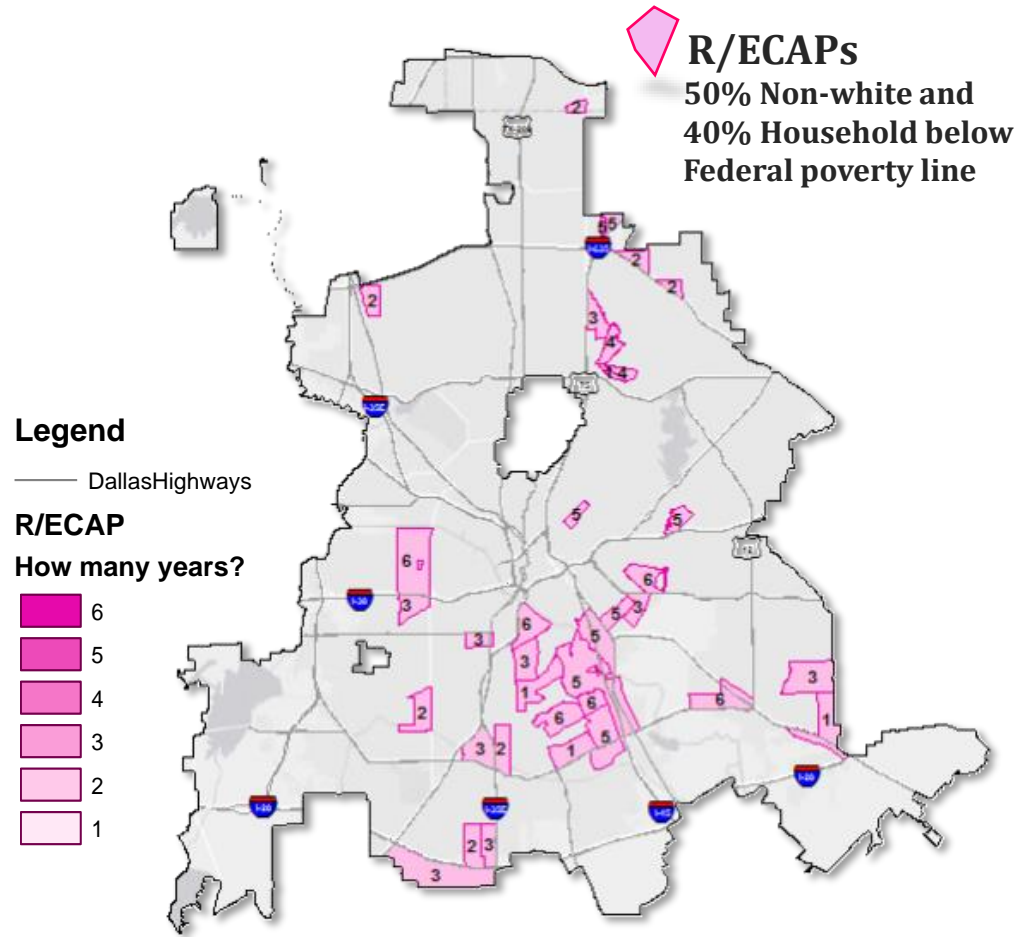
R/ECAP , Segregation, and HCV
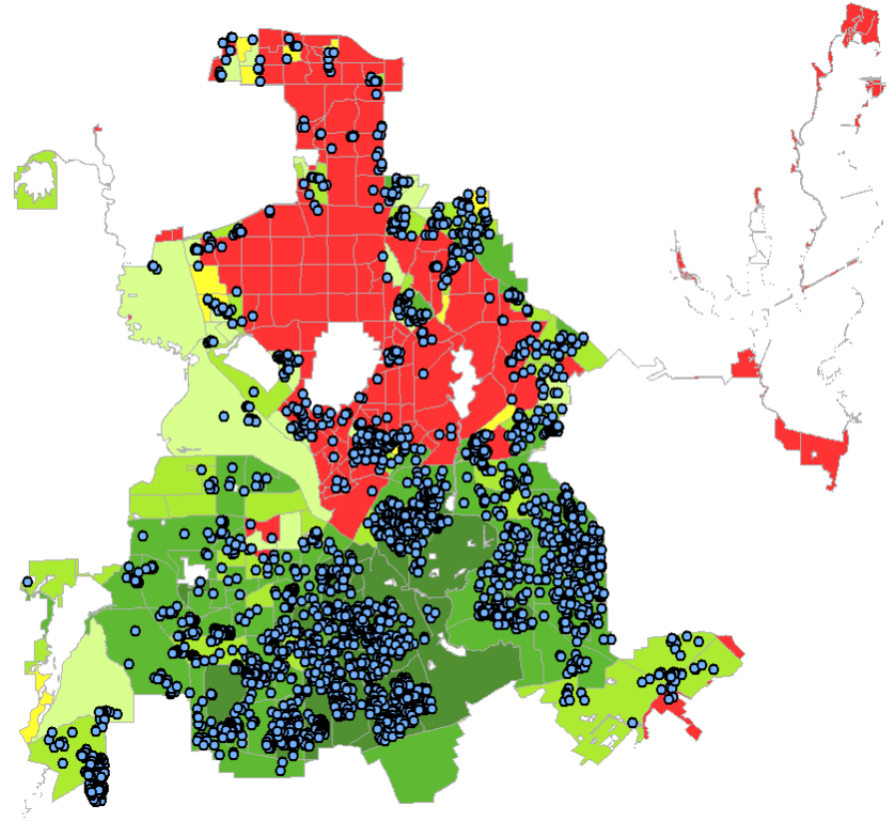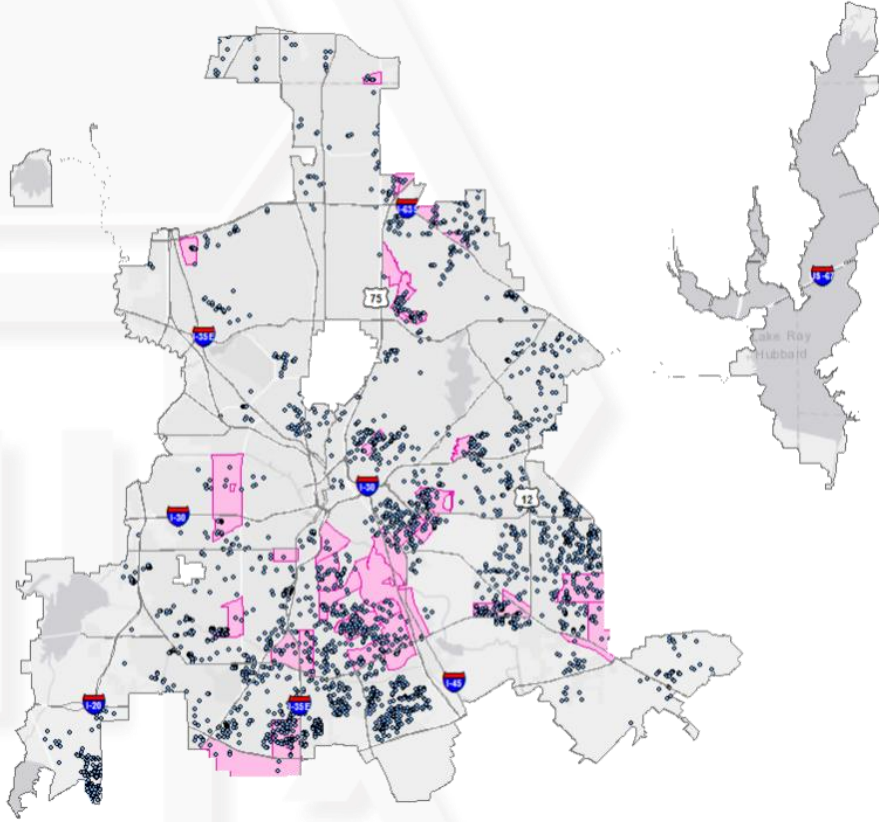
503 HCV families in one census tract

85 HCV families in average in R/ECAP

22 HCV families in average in non-R/ECAP

HCV families tend to live in the most segregated areas in Dallas, and region

R/ECAPs
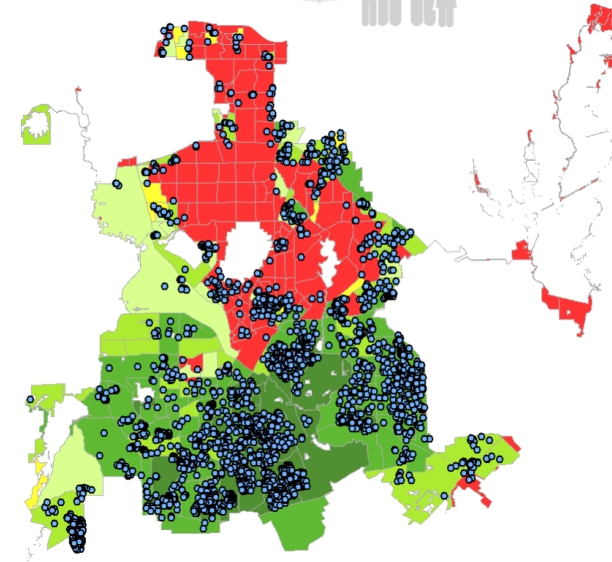50% Non-white and
40% Household below
Federal poverty line

Source of Income Discrimination and Residential living patterns of HCV
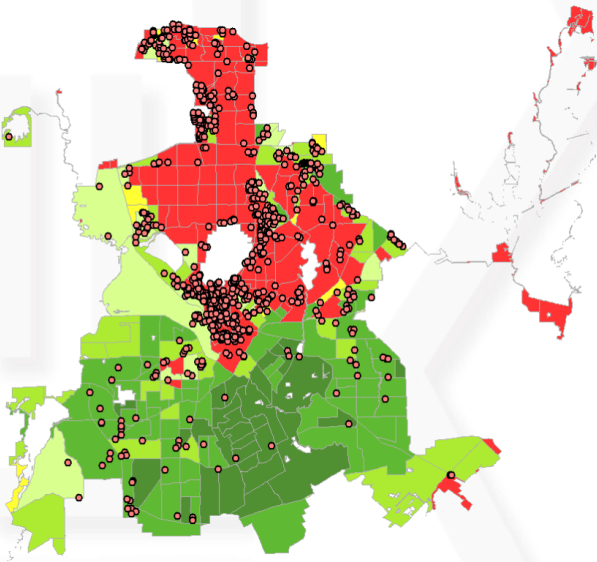
Surveyed landlords refusing vouchers
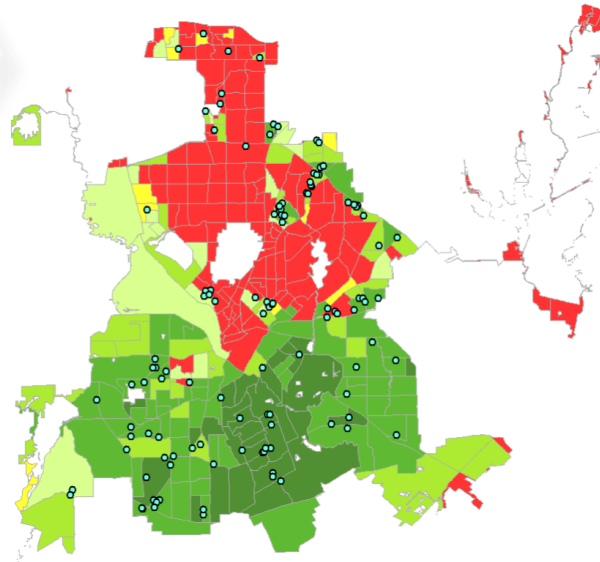
Surveyed landlords accepting vouchers

Residential patterns HCV families

Source: Raw data made available by Inclusive Communities Project, analyses conducted by UTA Researchers

HCV disproportionately concentrated in R/ECAPs

91 % of surveyed landlords reside outside R/ECAPs

If each of these landlords would house four families, **no HCV family would reside within a R/ECAP in Dallas**

14

R/ECAPs and Accessibility Challenges

1.8 LIHTCs per LILA tracts
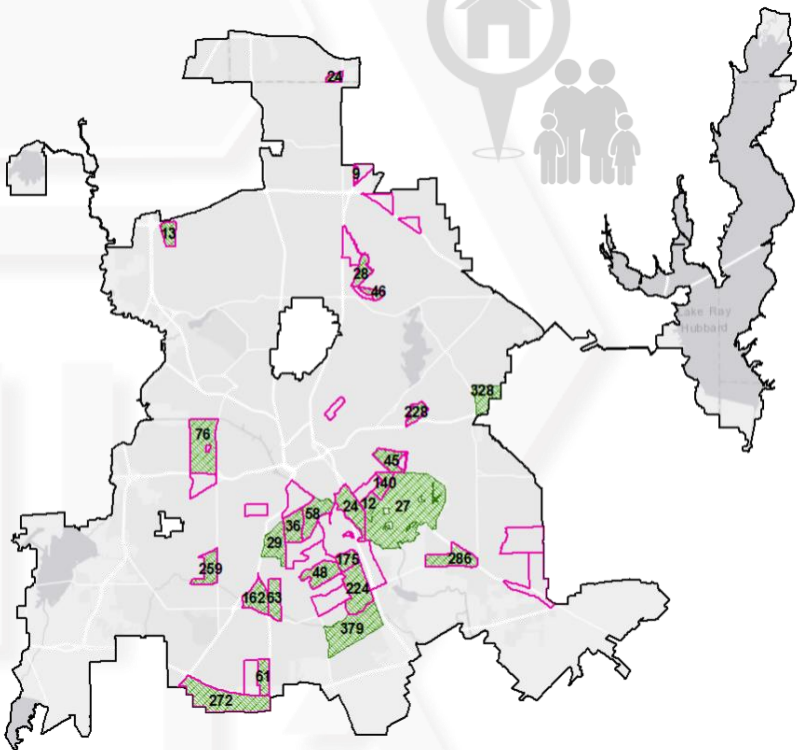
Legend
- □ R/ECAP 2016
- □ Low Income Low Access to Food (LILA)
- ∘ Housing Choice Voucher Families
- **35** Number of HCV within LILA census tract
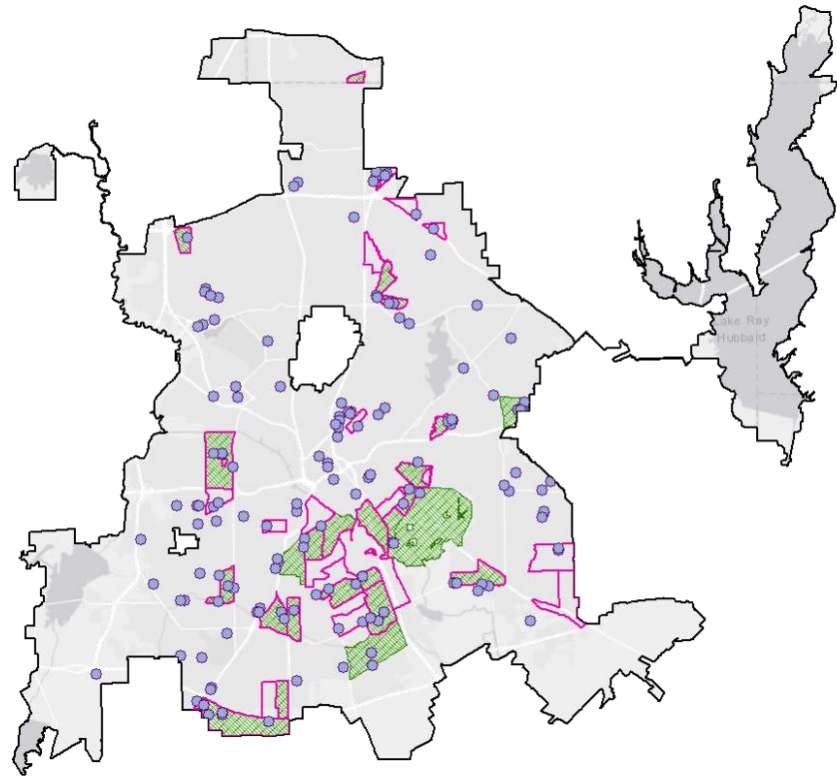
Legend
- ● Low Income Housing Tax Credit
- □ R/ECAP 2016
- ▨ Low Income Low Access to Food

Low-Income Low-Access (LILA) tracts: characterized by extreme poverty rate (40%) as well as low access to food and vehicle availability

UNIVERSITY OF
TEXAS
ARLINGTON

15

Transportation Barriers

Overwhelming majority of HCV families have insufficient resources to meet transportation needs

Affordability pressures faced by 30%AMI, 50%AMI, 80% AMI households
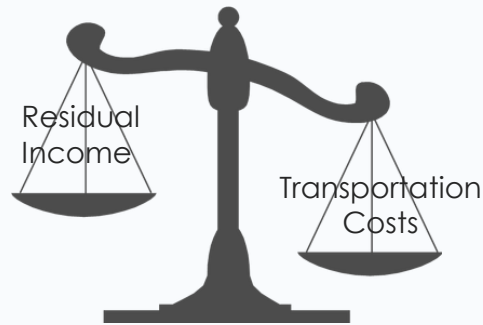
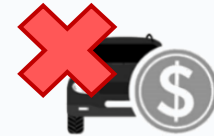Percent of HCV families **unable to afford** transportation

Car Scenario

Buy, maintain and operate a car	**75%**
Maintain and operate a car	**63%**

Transit Scenario
Regional Monthly Transit Pass

For all family members	**57%**
For all adults and ½ of the dependents	**55%**
For all adults	**54%**
For head of household only	**52%**

UNIVERSITY OF
TEXAS
ARLINGTON
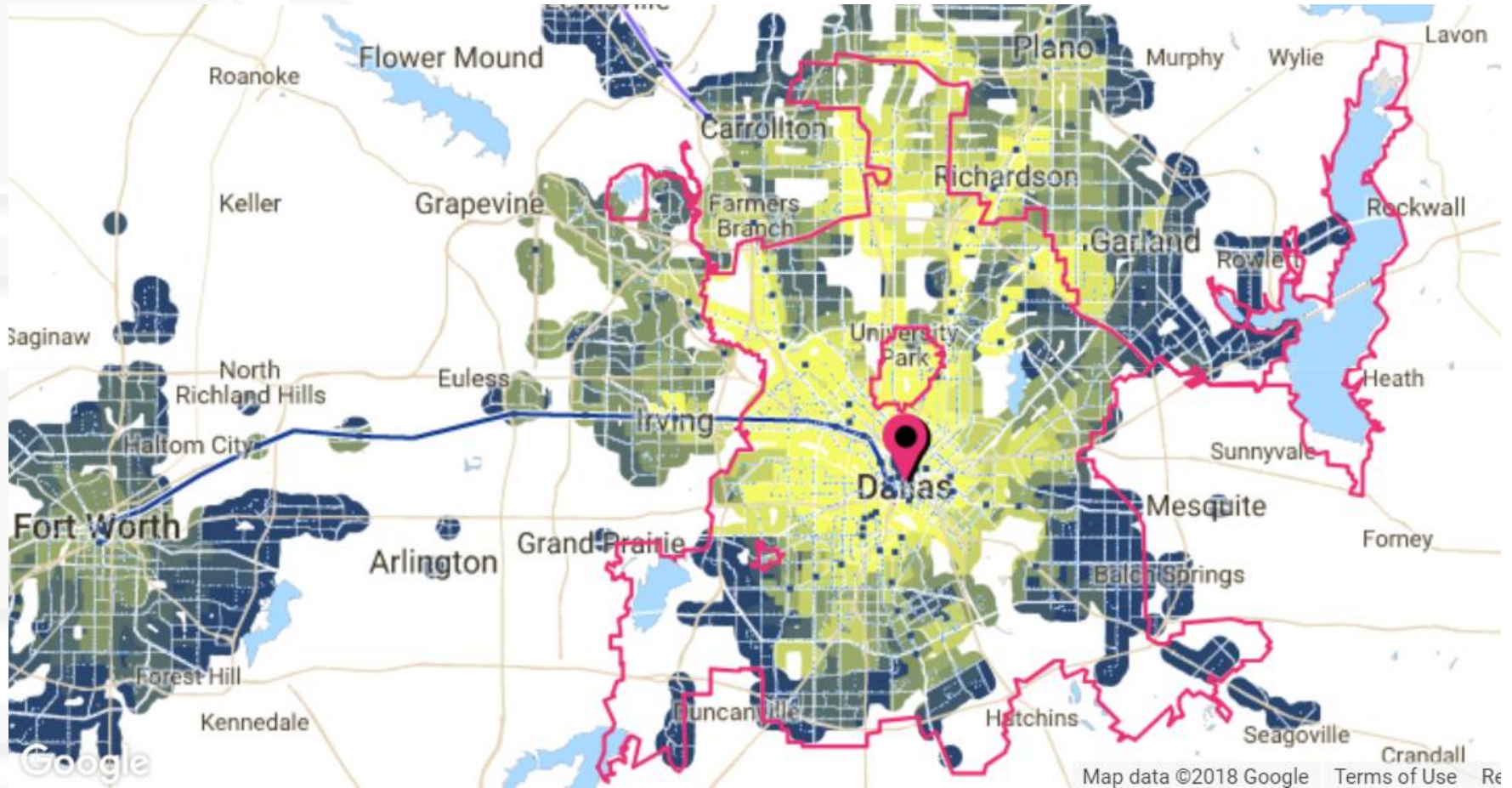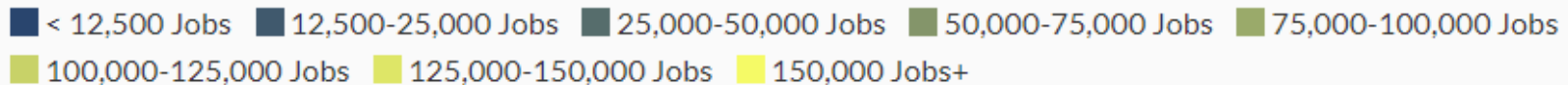
16

R/ECAPs and Accessibility Challenges

Number of jobs accessible within a 30 minute transit commute held by workers with earnings greater than $3333/month on average for households.

- ■ < 12,500 Jobs
- ■ 12,500-25,000 Jobs
- ■ 25,000-50,000 Jobs
- ■ 50,000-75,000 Jobs
- ■ 75,000-100,000 Jobs
- ■ 100,000-125,000 Jobs
- ■ 125,000-150,000 Jobs
- ■ 150,000 Jobs+

17

Source: Center for Neighborhood Technology

AFFORDABILITY PRESSURES

#21 Texas — View State Map

State Facts

MINIMUM WAGE	$7.25
AVERAGE RENTER WAGE	$18.20
2-BEDROOM HOUSING WAGE	$19.32
NUMBER OF RENTER HOUSEHOLDS	3,542,096
PERCENT RENTERS	38%

Working at minimum wage
$7.25/hr

Each week you have to work
86 HOURS!

To afford a modest 1 bedroom rental home at Fair Market Rent

Affordable Rent for Low Income Households

Minimum Wage Worker — $377/mo

Household at 30% of Area Median Income — $524/mo

Worker Earning Average Renter Wage — $946/mo

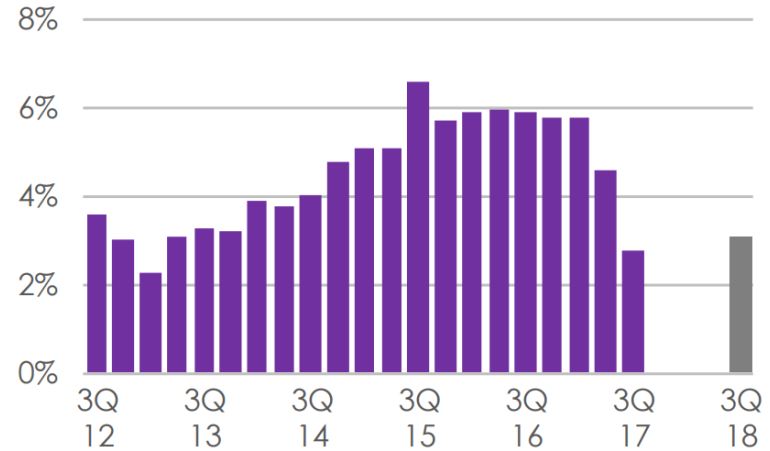### Fair Market Rent

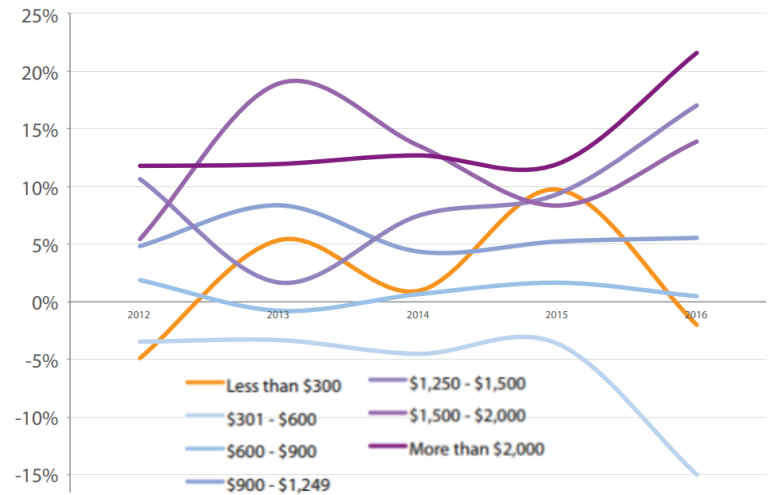**1-Bedroom Fair Market Rent** — $812/mo

2-Bedroom Fair Market Rent — $1,005/mo

Source: Out of Reach (2018) National Low Income Housing Coalition

Annual Rent Change

Source: MPF Research

Legend: Less than $300 · $301 - $600 · $600 - $900 · $900 - $1,249 · $1,250 - $1,500 · $1,500 - $2,000 · More than $2,000

Source: Housing production, bcWorkshop (2018)

AFFORDABILITY PRESSURES

Burden is greater for:
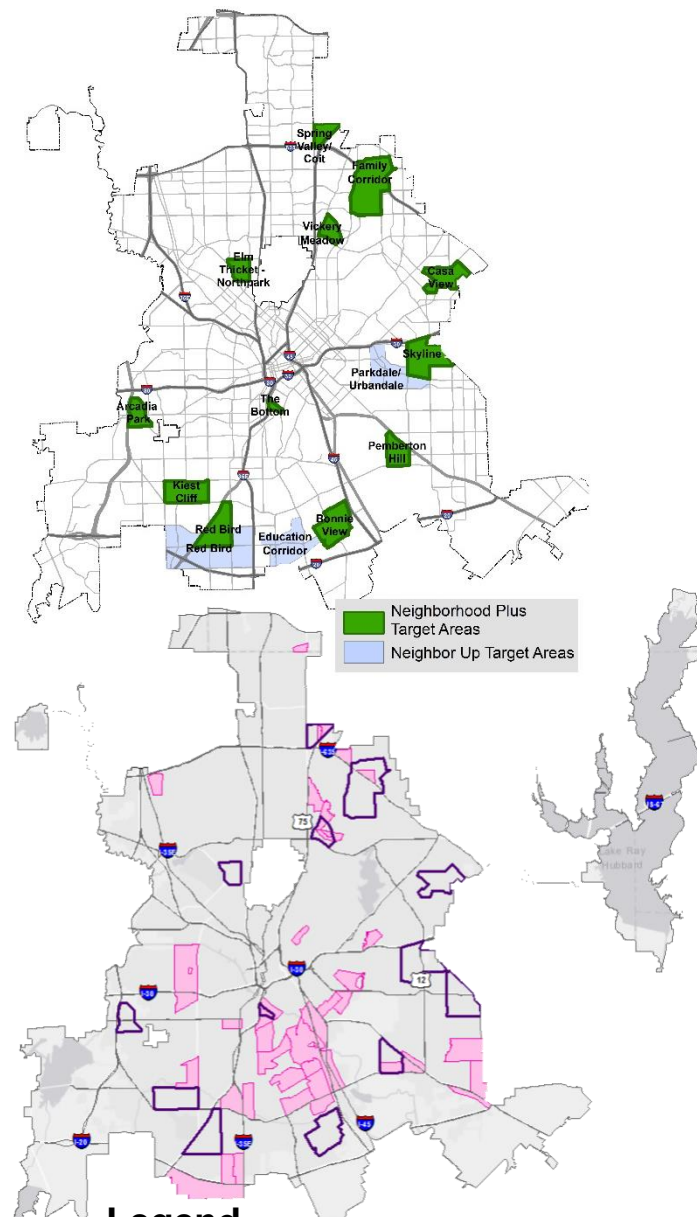
Renters > Owners

Households below or at 30%AMI

Households below or at 50%AMI

| Dallas, Texas (2015)					
Income by Cost Burden (Renters only)	**Cost burden > 30%**	**%**	**Cost burden > 50%**	**%**	**Total**
Household Income less-than or= 30% HAMFI	57,575	79%	46,910	64%	72,830
Household Income >30% to less-than or= 50% HAMFI	38,270	75%	10,020	20%	50,985
Household Income >50% to less-than or= 80% HAMFI	18,130	32%	2,490	4%	56,555
Household Income >80% to less-than or= 100% HAMFI	3,625	14%	380	2%	25,030
Household Income >100% HAMFI	3,170	5%	340	0.5%	70,000
Total	**120,770**		**60,140**		**275,395**
Income by Cost Burden (Owners only)	**Cost burden > 30%**	**%**	**Cost burden > 50%**	**%**	**Total**
Household Income less-than or= 30% HAMFI	15,860	71%	11,490	51%	22,425
Household Income >30% to less-than or= 50% HAMFI	14,095	56%	6,060	24%	25,105
Household Income >50% to less-than or= 80% HAMFI	11,655	35%	3,335	10%	33,530
Household Income >80% to less-than or= 100% HAMFI	4,080	22%	995	5%	18,925
Household Income >100% HAMFI	8,890	9%	1,520	1%	101,865
Total	**54,580**		**23,400**		**201,855**

REVITALIZATION PROGRAMS
Neighborhood Plus Plan

Neighborhood Plus Focus Areas Overlapping with R/ECAPs	Number of R/ECAPs at least partially within NP areas in 2015	Number of R/ECAPs at least partially within NP areas in 2016	Average Poverty Rate (2016)	Average Nonwhite concentration (2016)
The Bottom	1		26%	85%
Vickery Meadow	2	2	33%	71%
Pemberton Hills	1	1	41%	97%
Family Corridor	1	1	24%	70%
Coit/Spring Valley	2	2	30%	82%
Elm Thicket-Northpark			9%	53%
Bonnie View			27%	98%
Kiest Cliff/Kimball Heights			28%	91%
Red Bird			28%	94%
Casa View			20%	74%
Skyline			28%	80%
Arcadia Park			27%	94%
Pleasant Grove			24%	89%
Total	**7 (out of 32)**	**6 (out of 36)**	**26%**	**80%**

Legend

Neighborhood Plus Focus Areas

R/ECAP

Yes

REVITALIZATION PROGRAMS
MVA/ Housing Policy

R/ECAPs:
distressed and middle
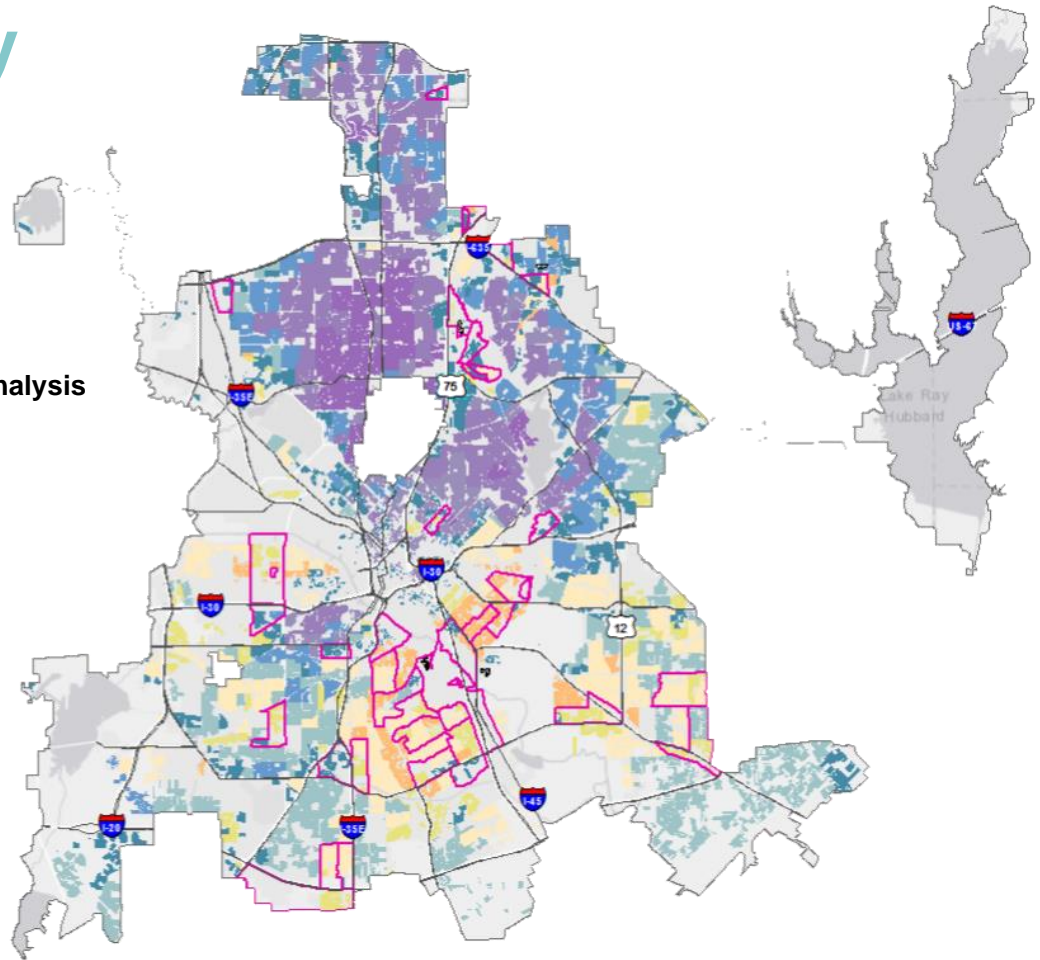**real estate** markets

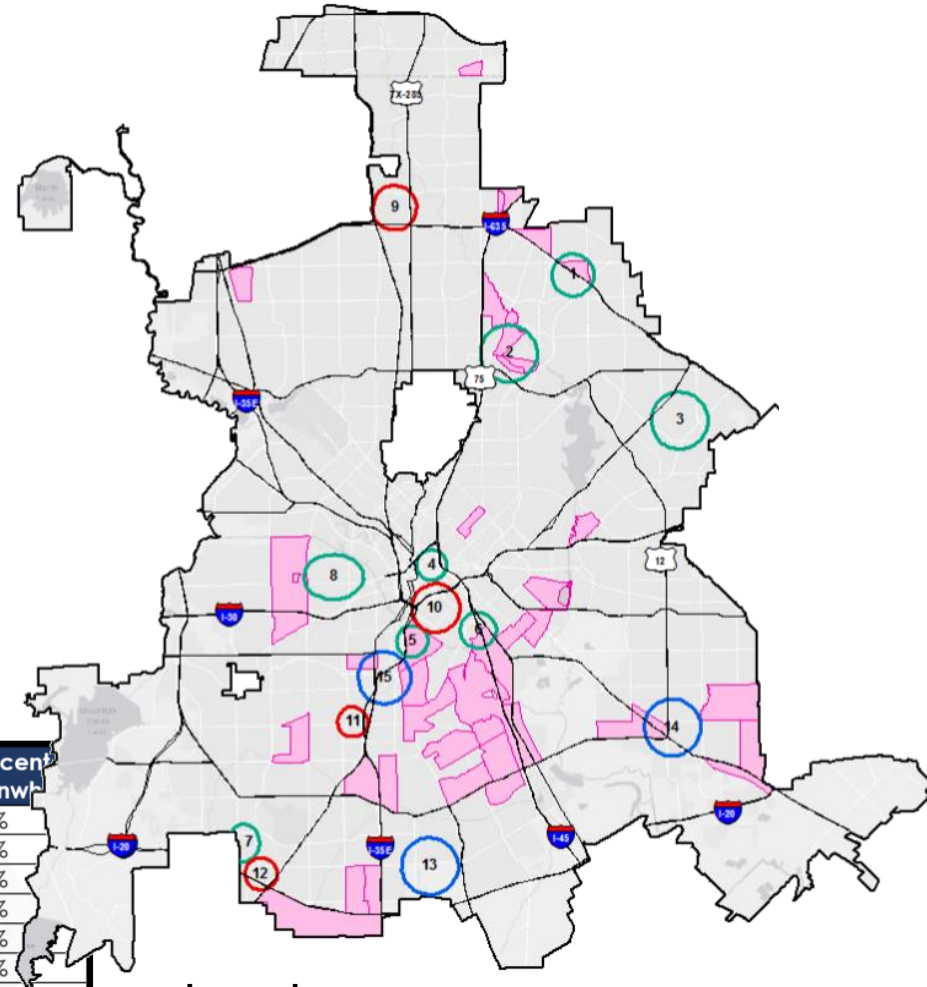
Legend

MarketValueAnalysis

Market Types

A
B
C
D
E
F
G
H
I
NA

R/ECAP
2016

Yes

REVITALIZATION PROGRAMS
MVA/ Housing Policy

MAP ID	NAME	TYPE	R/ECAP Overlap?	Poverty Rate	Percent Nonwh
1	LBJ - Skillman	Stabilization Areas	Complete	30%	79%
2	Vickery Meadow	Stabilization Areas	Complete	30%	65%
3	Casa View	Stabilization Areas	No	18%	66%
4	East Downtown	Stabilization Areas	No	26%	50%
5	The Bottom	Stabilization Areas	Substantial	31%	75%
6	Forest Heights	Stabilization Areas	Partial	34%	94%
7	Red Bird	Stabilization Areas	No	23%	89%
8	West Dallas	Stabilization Areas	Slight	36%	87%
9	Midtown	Redevelopment Area	No	17%	62%
10	High Speed Rail	Redevelopment Area	No	31%	68%
11	Wynnewood	Redevelopment Area	No	23%	90%
12	Red Bird	Redevelopment Area	No	34%	95%
13	University Hills	Emerging Market Area	No	23%	97%
14	Pleasant Grove	Emerging Market Area	Partial	37%	93%
15	Southern Gateway	Emerging Market Area	Partial	31%	89%

Legend

Reinvestment Areas

Emerging Market Area

Redevelopment Area

Stabilization Areas
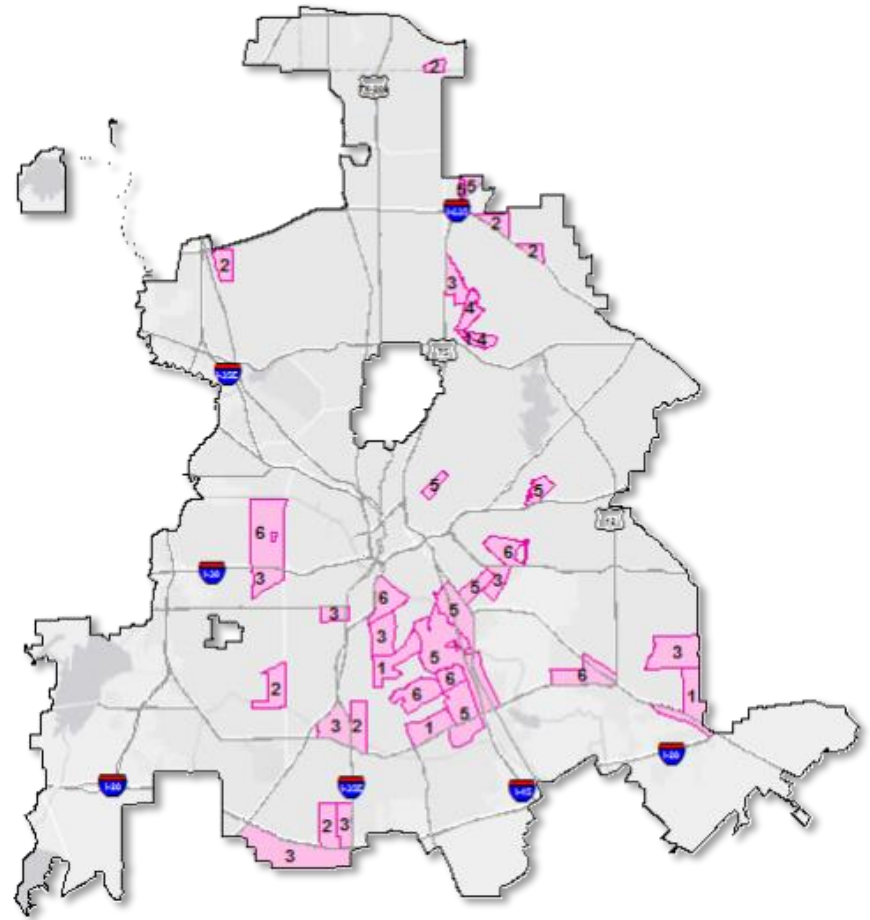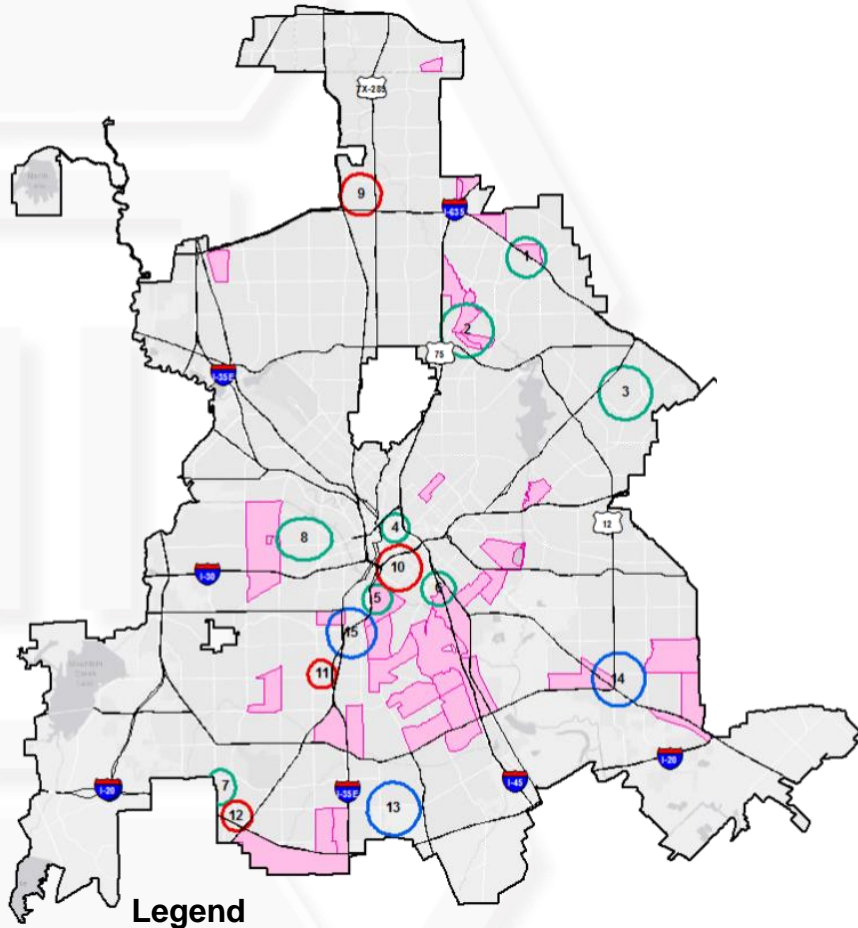
R/ECAP 2016

Yes

22

REVITALIZATION PROGRAMS MVA/ Housing Policy
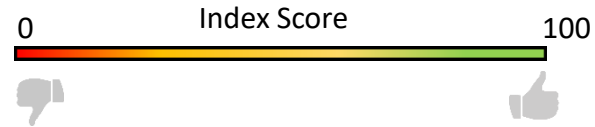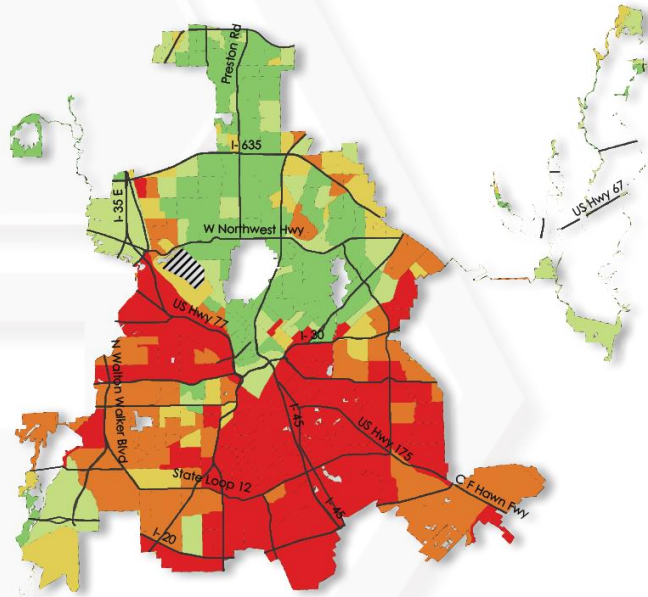
Legend

Reinvestment Areas
- Emerging Market Area
- Redevelopment Area
- Stabilization Areas

R/ECAP 2016
- Yes

23

Labor Market Engagement – Opportunity Index

Dallas Index Score	Number census tracts	Percent White	Percent Black	Percent Hispanic	Percent Asian/PI	Percent 30%AMI	Percent 50%AMI	Percent 80%AMI	Percent Families with Children
0-9	36	1.4	20.5	8.1	0.7	15.4	10.5	7.2	15.4
10-19	40	3.7	21.2	17.2	2.9	17.6	15.0	12.4	17.6
20-29	33	3.1	9.2	17.9	5.3	12.0	12.6	11.9	12.0
30-39	35	5.5	10.7	16.4	6.8	11.8	13.7	12.7	11.8
40-49	22	3.7	5.5	10.3	7.0	7.7	9.6	8.8	7.7
50-59	25	6.6	7.9	7.8	6.7	5.9	7.3	8.7	5.9
60-69	32	9.7	7.6	6.4	12.6	6.6	7.9	8.3	6.6
70-79	33	14.3	7.9	5.5	12.5	5.3	7.1	8.4	5.3
80-99	36	15.1	4.0	5.0	12.1	6.7	5.8	7.0	6.7
90-100	87	37.0	5.5	5.5	33.2	10.9	10.5	14.6	10.9

KEY FINDINGS

- Stark geography of inequity

  - o Growing racial/ethnic and economic segregation
  - o Racial/ethnic inequities
  - o Affordability pressures
  - o Dallas/Region imbalances
  - o Systemic barriers to access opportunities

    Compounding effects of inequitable geography

- Promising initiatives:
  - o Housing Policy, Office of Equity and Human Rights

FAIR HOUSING GOALS

- Analysis of public input (coding and ranking)
- Prioritization of contributing factors to fair housing issues
- Synthesis quantitative data/qualitative data

City of Dallas, Texas	Number	Percent
	1153	100%
Contributing Factors of Disparities in Access To Opportunity	363	31%
Contributing Factors of Segregation	196	17%
Contributing Factors of Disproportionate Housing Needs	195	17%
Contributing Factors of R/ECAPs	169	15%
Contributing Factors of Publicly Supported Housing Location and Occupancy	128	11%
Disability and Access Issues Contributing Factors	92	8%
Fair Housing Enforcement	10	1%

UNIVERSITY OF
TEXAS
ARLINGTON

26

FAIR HOUSING GOALS

- Foster collaboration (Region/City/Housing authorities)
- Acknowledge and address inequitable geography
- Both substantive and procedural

❑ See handout for potential strategies

Final Goals	
Goal A	Increase access to affordable housing in high opportunity areas
Goal B	Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas
Goal C	Increase supply of accessible, affordable housing for persons with disabilities
Goal D	Make investments in targeted and segregated neighborhoods to increase opportunity while protecting residents from displacement
Goal E	Increase support and services for residents of publicly supported housing, and maintain and improve the quality and management of publicly supported housing
Goal F	Increase access to information and resources on fair and affordable housing

NORTH TEXAS REGIONAL ASSESSMENT

Dr. Myriam Igoufe
Co-Principal Investigator and Project Manager

Dr. Stephen Mattingly,
Principal Investigator

Research Team

University of Texas at Arlington (UTA) is an elite, diverse research university with activities focused around four key areas: Sustainable Urban Communities, Health and the Human Condition, Global Environmental Impact, and Data-Driven Discovery. UTA is classified as a Tier 1 Research University from the Carnegie Classification of Institutions for Higher Education.

Faculty and researchers from diverse disciplines including Urban Planning, Public Policy, and Civil Engineering led the Regional Assessment. The research team for this project included more than 30 researchers (professors, doctoral, masters and undergraduate students).

Principal Investigators

Dr. Stephen Mattingly, Principal Investigator (Civil Engineering)
Dr. Myriam Igoufe, Co-Principal Investigator and Project Manager (Urban Planning and Public Policy)
Dr. Ivonne Audirac, Co-Principal Investigator (Urban Planning and Public Policy)
Dr. Rod Hissong, Co-Principal Investigator (Public and Urban Administration)

Lead PhD Students

Flora Brewer, Urban Planning and Public Policy
Lorin Carter, Urban Planning and Public Policy
Eric Varela, Urban Planning and Public Policy
Indira Manandhar, Urban Planning and Public Policy

Graduate and Undergraduate Research Assistants

Han Jiang, PhD student in Civil Engineering
Will Sanders, PhD student in Civil Engineering
Trevor Stull, Undergraduate student in Civil Engineering
Kevin Wienhold, Masters student in Civil Engineering
Priscylla Bento, PhD student in Urban Planning Policy
Aldo Fritz, PhD student Urban Planning and Public Policy
Carlye Lide, Masters student in Civil Engineering
Nick Sopko, Undergraduate student in Civil Engineering
Dr. Abeer Almughrabi, Urban Planning and Public Policy
Gedeon Modo Modo, PhD student in Urban Planning and Public Policy
Gwendolyn Isokpan, PhD student in Urban Planning and Public Policy
Baharan Rahnama, PhD student in Urban Planning and Public Policy
Kate Norris, PhD student in Public and Urban Administration
Hannah Carrasco, Masters Student in City and Regional Planning

Jesika Gohil, Masters student in City and Regional Planning
Felipe Rocha, Masters student in Civil Engineering
Jose Bautista, Undergraduate student in Civil Engineering
Richard Stiles, Undergraduate student in Civil Engineering
Marena Jensen, Undergraduate student in Civil Engineering
Boni Jobaidul Alam, Masters student in Civil Engineering
Sheida Khademi, PhD student in Civil Engineering
Ellen Dinh, Undergraduate student in Civil Engineering
Raymond Aung, Undergraduate student in Civil Engineering
Guillermo Mendoza, Undergraduate student in Civil Engineering
Letty Duarte, Undergraduate student in Civil Engineering
Hayden Lewis, Undergraduate student in Civil Engineering
Karyna Uribe, Undergraduate student in Civil Engineering
Maria Frias, Undergraduate student in Civil Engineering