Analysis of Impediments To Fair Housing Choice

City of Dallas, Texas

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Prepared for:
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I. INTRODUCTION

Context

The City of Dallas, Texas is an entitlement participant in the U.S. Department of Housing and Urban Development's (HUD) federal block grant funding administered through the Community Planning and Development office of HUD. Equal access to housing is one of the principles of equality HUD pursues for everyone who lives in the United States. Equal access includes protections from discrimination in:

1. housing,
2. sale, rental, and financing of dwellings,
3. lending,
4. home appraisal,
5. insurance, as well as
6. accessibility and the freedom for anyone to live where they choose.

In 2016, HUD published new guidance related to the AFFH. This guidance included a prescribed information collection device to be used to assess fair housing issues as part of the consolidated planning process. The resulting assessment was referred to as an Assessment of Fair Housing (AFH). The AFH was developed to replace the Analysis of Impediments. According to the new HUD rules, the AFH was required to be submitted no less than 270 days before the new five-year Consolidated Plan. The deadline for submission of the AFH was January 4, 2018.   In preparation for submission of the next Five-Year Con Plan, for the period of FY 2018-19 through FY 2022-23 (due to HUD by August 16, 2018), the City immediately began work on the AFH.

HUD encouraged collaboration for completion of the AFH so that jurisdictions would be able to share resources and consider fair housing issues from a broader perspective. The City of Dallas led the consortium in retaining the University of Texas at Arlington (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.

Because the City of Dallas was the lead entity, the deadline for submission of the regional assessment was also January 4, 2018. Because of multiple changes by HUD to the new AFH rules, the City submitted a request to HUD for approval of a one-year extension to the current five-year period covered by the City's approved Consolidated Plan to complete the AFH. HUD approved the City's request to extend the period covered by the Consolidated Plan to September 30, 2019. Following HUD's approval, on June 27, 2018, the City Council authorized final adoption of a Substantial Amendment to the current five-year Consolidated Plan to extend the covered period by one year, from September 30, 2018 to September 30, 2019, by Resolution No. 18-0987.

In January 2018, the acting presidential administration delayed implementation of the AFFH Rule until at least 2020, precluding the need to submit an Assessment of Fair Housing to HUD. Nevertheless, the regional working group and UTA completed the AFH process, finalizing reports over the course of 2018 and 2019.

Analysis of Impediments Background

As a recipient of federal block grant funds including Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) funds from U.S. HUD, the City of Dallas must certify that it will "affirmatively further fair housing" in accordance with federal regulatory requirements at 24 CFR 91.225(a)(1). The certification means that the City will conduct an Analysis of Impediments to fair housing choice (AI) within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.[1] Given that submission of the Assessment of Fair Housing to HUD was no longer necessary, the City of Dallas was instead required to complete an update of its 2015 Analysis of Impediments.

The City of Dallas and NTRHA went above and beyond what was required to update its Analysis of Impediments. The comprehensive nature of that effort to "affirmatively further fair housing" and the proximity between completion of the AFH and submission of the Analysis of Impediments permits a significant portion of information gathered throughout the AFH process to be utilized throughout this Analysis of Impediments. Such information comes from all three vital phases of the AFH process: community outreach, data analysis and the formulation of fair housing goals to address the issues identified.

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[1] http://www.gpo.gov/fdsys/pkg/CFR-2004-title24-vol1/pdf/CFR-2004-title24-vol1-sec91-225.pdf.
U.S. Government Printing Office retrieved March 20, 2015

Fair Housing Laws and Regulatory Framework

The Federal Fair Housing Act (FHA) or Title VIII of the Civil Rights Act of 1968, and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status, and disability (physical and mental). The persons represented in the above categories are referred to as "protected classes". The FHA covers most housing types including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

Section 808 of the Act says that the authority and responsibility for administering the Act resides with the Secretary of Housing and Urban Development. Among the functions of the Secretary are to prepare an annual report to Congress; and *administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this subchapter.*

The National Affordable Housing Act of 1990, which governs the HOME program, as amended, {Section 105 (b)(15)} requires jurisdictions to include a certification with the housing strategy certifying that the jurisdiction will *affirmatively further fair housing.* Specifically, Consolidated Plan Regulations at 24 CFR 91.225 (a) state that the following certification must be included in the annual submission to HUD: (1) *Affirmatively furthering fair housing* - Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

The regulations governing the CDBG program also address fair housing requirements. Under 24 CFR 570.506(g) – Records to be maintained - the grantee must maintain fair housing and equal opportunity records containing: a) Documentation of the analysis of impediments; and b) The actions the recipient has carried out with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice in the recipient's community. Also, per 24 CFR 570.601 (a) (2) the Fair Housing Act (42 USC 3601-3620 applies. It states that "in accordance with the Fair Housing Act, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner to *affirmatively further the policies of the Fair Housing Act.* Furthermore, in accordance with section 104(b)(2) of the Act, for each community receiving a grant under subpart D of this part, the certification that the grantee will affirmatively further fair housing shall specifically require the grantee *to assume the responsibility of fair housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintaining records reflecting the analysis and actions in this regard.*"

Finally, the Consolidated Plan certifications include under the Specific CDBG Certifications that the Entitlement Community certifies under "Compliance with Anti- Discrimination Laws - that the grant will be conducted and administered in conformity with title VI of the Civil Rights Acts of 1964 (42 USC 2000d), the Fair Housing Act (42UAC 3601-3619), and implementing regulations.

In addition to the abovementioned federal requirements, the City of Dallas is required to comply with any state and local fair housing laws. The State of Texas also prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, disability, or familial status. The Texas Fair Housing Act applies to the sale, rental and financing of residential housing. According to the website of the Texas Workforce Commission, which administers the Act's provisions, "*the Texas Fair Housing Act covers most housing. In some circumstances, the law exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members. Also, housing developments that qualify as housing for persons age 55 or older may be exempt from*

the provisions barring discrimination on the basis of familial status."[2] The State does not recognize4 any other protected classes.

The City of Dallas's Fair Housing Office (FHO) is certified by HUD as a substantially equivalent agency and participates in the Fair Housing Assistance Program (FHAP). Substantial equivalence certification takes place when a State or local agency applies for certification and U.S. HUD determines that the agency enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. Locally, the City adopted a sexual orientation ordinance on May 8, 2002 which became effective October 1, 2002. Chapter 46, "Unlawful Discriminatory Practices Relating to Sexual Orientation" prohibits discrimination based on sexual orientation in housing, employment and public accommodations.

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[2] Texas Workforce Commission website, http://www.twc.state.tx.us/partners/housing-discrimination#overview, accessed April 12, 2015

Purpose of the AI

The Fair Housing regulations of January 1989 did not include guidelines concerning how to "affirmatively further fair housing." Requirements with review criteria and the areas to be covered by the analysis of impediments to fair housing choice were included in the CDBG regulations published in September 6, 1988. It was not until the Fair Housing Planning Guide was published that affirmatively furthering fair housing was defined. The HUD Fair Housing Planning Guide provides the following definitions and outlines the purpose of the AI.

According to HUD, impediments to fair housing choice are any actions, omissions, or decisions:

1. *That are taken because of* someone's membership in one of the protected classes and that restrict housing choices or the availability of housing.
2. *That has the effect* of restricting housing choices or the availability of housing choices on the basis of membership in the protected classes.

According to the Guide, policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to persons because of race, ethnicity, disability, and families with children may constitute such impediments, referred to as "disparate impact."

The AI involves:

- A review of the City's demographic, economic, and housing characteristics;
- A review of a City's laws, regulations, and policies, procedures and practices and how they affect the location, availability and accessibility of housing;
- An assessment of conditions, both public and private, affecting fair housing choices for all protected classes;
- Public education and outreach efforts, and a community fair housing survey; and
- Identifying any existing impediments or barriers to fair housing choice and to develop an action plan containing strategies to overcome the effects of any impediments identified in the AI.[3]

The Guide states that the purposes of the AI are to:

- Serve as the substantive, logical basis for the fair housing planning;
- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and
- Assist in building public support for fair housing efforts within a City and beyond.[4]

The Guide provides suggested sources of data and studies, methods to obtain citizen participation, suggested outline, format for fair housing planning, sample of corrective actions and measurable results, and suggestions for complying with fair housing requirements for persons with disabilities. HUD does not require the City to commence a data collection effort in order to complete an AI. HUD allows grantees to use existing available data. Data includes HUD and Federal agency databases and studies, State and local information sources, private housing industry reports, and college university/research. The Guide also indicates that data from the Consolidated Plan can be used for the analysis of impediments.

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[3] U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-7) March 1996
[4] U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, page 2-8) March 1996

Planning Research and Methodology

The consultant's methodology in conducting the Dallas AI was based on the recommended methodology in the *Fair Housing Planning Guide Vol. 1* (published by HUD's Office of Fair Housing and Equal Opportunity in 1996); experience completing similar reports, and the desires of the City's leadership. Revisions to fair housing strategies, new ways to access data, and improved ways of conducting the AI have occurred since 1996. Still, both HUD and program participants have recognized that the AFFH certification has not been as effective as it could be due to inconsistencies in conducting an AI and in implementing the requirements. As a result, HUD published the proposed "Affirmatively Furthering Fair Housing" (AFFH) Rule in July 2013, with further guidance on the AFFH Rule coming in 2016. The intent of the rule as articulated in the Federal Register Notice is to "refine existing requirements with a fair housing assessment and planning process that will better aid HUD program participants fulfill this statutory obligation and address specific comments raised by the U.S. Government Accountability Office (GAO)." Fulfilling the proposed rule guided the City of Dallas and University of Texas at Arlington in their completion of both the North Texas Regional Housing Assessment and AI.

Public Participation in the AI

As noted previously, this AI utilizes information gathered over the course of public participation efforts conducted for the Assessment of Fair Housing. In accordance with the City Citizen Participation Plan and Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i), the City of Dallas conducted an inclusive community participation process that included input from City officials, residents, and key persons involved in the housing and community development industry, and in particular, fair housing.

As part of the Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i) and in accordance with its Citizen Participation Plan, 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.

As noted under "Context", public participation efforts from the North Texas Regional Housing Assessment are utilized throughout this AI. Public participation was conducted by independent facilitators from the University of Texas at Arlington, rather than individuals associated with the City of Dallas. This included all public meetings and focus groups. Facilitation by individuals not employed by the City of Dallas ensured that all community members would feel comfortable sharing firsthand experiences, knowledge and criticism of agencies, if desired. The UTA research team is confident that this report captures community voices and their account of housing realities. Table 1 shows the key tools utilized throughout the process, as well as their intended goals and target groups. Additional information is provided in Section V, "Public Outreach".

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

Table 1: Public participation strategies

Fair Housing Planning

While fair housing planning (FHP) is not the main purpose of the AI, the Fair Housing Planning Guide identifies three AI components that guide fair housing planning as summarized below:

Component I The AI involves:	Assembling Fair Housing Information Information needs include the following:
A review of the grantee's laws, regulations, etc.; An assessment of how those laws, etc. affect the location, availability, and accessibility of housing; An assessment of conditions, both public and private, affecting fair housing choice for all protected classes; Assessment of the availability of affordable, accessible housing in a range of unit sizes.	Housing policies, practices, and procedures; zoning and land use policies; Fair housing complaints/suits or other data; Demographic patterns; Home Mortgage Disclosure Act (HMDA) data; Results of testing; Results of Fair Housing Initiatives Program (FHIP) grants; Patterns of occupancy in Section 8, Public and Assisted Housing, and private rental housing.
Component 2	**Fair Housing Actions**
Before developing actions to eliminate effects the grantee should: Ensure diverse groups participate in the developmental process; Create the structure for the design/ implementation of the actions. Steps to take before developing actions: Define objectives with measurable results; For each objective, the jurisdiction should have a set of goals or actions	Fair housing action(s) for each objective; Time period for completion; Resources from local, State, and Federal agencies; Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.

Implement Fair Housing Actions

- Designed achievable actions, designed to address real fair housing problems
- Assessed its FHP activities on a regular basis

Self-Assessment

Fair housing planning should include a process for monitoring the progress in carrying out each action and evaluating effectiveness

Changes

Fair housing planning should include a process for making "mid-course" corrections, changes, or additions as the planned actions are underway.

Component 3	Maintenance of Records

- The AI
- Actions to eliminate identified impediments.
- A description of the nature of the chief executive or governing body's commitment to FHP
- A description of the financial and in-kind support for FHP, including funds provided by the jurisdiction. A list of groups participating in the formulation of FHP
- Notes from public meetings/forums and citizen comments/input.
- Progress reports.

Table 2: Fair housing planning and the Analysis of Impediments

Data Limitations

The data gathered for the AI has limitations that can affect any conclusions drawn from data analysis. The preparers of the AI that all of the data used from official sources, regardless of source, are accurate. All data is not consistent in the level of information provided, or the timeframe it is drawn from. For example, more current data sources such as ACS data may not have as many data sets to analysis as the Decennial Census, and a time-lag in the availability of many data sources exists. The AI is a point-in-time study intended to analyze the current fair housing environment within the City of Dallas and identify impediments. Some of the impediments that are identified may need additional research and analysis.

For the surveys, the respondents were asked to respond based on personal knowledge, perceptions, and experience. As such, responses may be influenced by the respondents' perception of housing discrimination and fair housing, certain neighborhoods, and understanding of terms. Several focus groups conducted nationally noted a greater awareness of discrimination based on race and less awareness of discrimination based on disability especially mental disability. In some cases, segregation of housing may not be due to lack of inclusive public policy, but rather social and cultural factors that remain beyond the City's control. Also, the delay in the completion of the AI may affect the responses received especially if conditions changed from the beginning of the survey period to the present. However, the sample size is sufficiently large and the experiences significant enough to guide people's perceptions of fair housing.

The use of data from other parts of the country is at times used to extrapolate potential patterns in Dallas, but such patterns might not necessarily hold true. Recommendations made by the preparer intend to serve as a guide to fair housing planning. Ultimately, the actions to be taken by the City of Dallas will be determined by the City's financial and human resources, as well as the City leadership's prioritization.

Summary of 2015 Impediments and Recommendations

The following is a summary of impediments and actions identified in the 2015 AI. A status of the recommendations shows the actions taken by the City and whether the impediment still exists. A fair housing action plan was developed in response to the 2015 impediments. Most of the proposed activities were education and outreach related. As such, actions were implemented by the City's Fair Housing Office. All proposed goals/actions were projected to take place from October 2013 to September 2018. Section VI, "Fair Housing Impediments and Recommendations", goes into further detail on 2015 impediments and recommendations.

Previous Impediment A: Lack of affordable housing for Dallas residents.

Action/Goal: Increase the production and preservation of affordable housing units.

Current status: A housing policy was developed with the goal of producing thousands of affordable units in the Dallas. The City has also successfully produced and preserved units through a multitude of programs in recent years.

Updated Recommendation(s): The goal has been partially met and should be maintained.

Previous Impediment B: Lack of accessible housing limiting housing choices for seniors and persons with disabilities.

Action/Goal: Increase the number of accessible housing units based on need.

Current status: Targeted action has been taken to increase housing choices for seniors and persons with disability.

Updated Recommendation(s): The goal has been partially met and should be maintained.

Previous Impediment C: Housing rehabilitation resources available to the City are not distributed between owner and renter households.

Action/Goal: The City should expand the rehabilitation programs to include repairs and accessibility modifications for rental properties.

Current status: NSP funds and HOME Tenant-based Rental Assistance have been used to offer some rehabilitation resources to Dallas's renters.

Updated Recommendation(s): The goal has been partially met, but further action is necessary to bridge the gap between owner and renter households.

Previous Impediment D: Lack of awareness of a reasonable accommodation procedure to provide relief from codes that may limit housing opportunities to individuals with disabilities.

Action/Goal: The City should ensure that persons with disabilities are aware of the procedure by which such persons may request reasonable accommodations or modifications on the basis of disability.

Current status: Held a fair housing forum during Fair Housing Month with presentations on disability protections. The City also conducted fair housing training for Disability Rights Texas and conducted training with lenders and real estate professionals working with the City of Dallas Mortgage Assistance Program.

Updated Recommendation(s): The action has been put in place and should be maintained.

Previous Impediment E: Historic pattern of concentration of racial/ethnic and low-income populations in the City.

Action/Goal: Develop a strategy to address historic patterns of concentration.

Current status: The City has worked with the community in developing numerous goals to address this issue over the course of completing the Assessment of Fair Housing.

Updated Recommendation(s): Complete the process articulated in the City of Dallas AFH Report and reiterated within this Analysis of Impediments.

Previous Impediment F: Lending practices may be disproportionately impacting racial and ethnic minority populations based on loan denial rates.

Action/Goal: 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.

Current status: The FHO has ramped up its education and outreach activities to cover underrepresented populations. The City has also conducted Monthly Homebuyer Training to educate homebuyers on fair housing laws and their rights.

Updated Recommendation(s): The action has been put in place and should be maintained.

Previous Impediment G: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.

Action/Goal: Promote education on reasonable accommodation and support services for persons with mental disabilities.

Current status: The City conducted Fair Housing Training for Disability Rights Texas and held a Fair Housing Forum during Fair Housing Month with presentations on disability protections.

Updated Recommendation(s): The action was put in place and should continue to be expanded.

Previous Impediment H: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP).

Action/Goal: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as persons with LEP, Asian Americans, and persons with disabilities including the hearing impaired, and the LGBT community.

Current status: The Fair Housing Office has increased outreach, training, and education. The City also purchased additional advertisements on Spanish-language radio and conducted Fair Housing Training for Disability Rights Texas.

Updated Recommendation(s): The recommended action has been put in place and should be maintained.

Previous Impediment I: Residents face challenges accessing public transportation, especially special needs population members including persons with disabilities and homeless persons.

Action/Goal: Increase access to public transportation and transit services for low- and moderate-income persons and protected class members.

Current status: The Fair Housing Office has increased outreach, training, and education. The City also purchased additional advertisements on Spanish-language radio and conducted Fair Housing Training for Disability Rights Texas.

Updated Recommendation(s): The recommended action has been put in place and should be maintained.

Previous Impediment J: Not in my Backyard (NIMBYism) sentiment is an impediment to fair housing choice.

Action/Goal: Increase education and outreach to dispel myths and false perceptions about affordable housing.

Current status: New HUD requirements and addition of staff have enabled the Fair Housing Office to increase its outreach, training, and education efforts.

Updated Recommendation(s): The recommended action has been put in place and should be maintained.

Summary of Current 2019 Impediments and Recommended Actions

Based on the available data and community input, the following is a summary of the current impediments to fair housing choice in both the public and private sectors in 2019 and recommended actions to address them. It must be noted that there are some impediments that were previously identified that are also identified in this current list. Recommendations were formulated for each impediment, as detailed later in Section VI, "Fair Housing Impediments and Recommendations".

Impediment #1: Lack of affordable housing in high-opportunity areas

Action: Increase access to affordable housing in high-opportunity areas.

Impediment #2: Insufficient affordable housing available in the City of Dallas

Action: Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas.

Impediment #3: Lack of affordable, accessible housing for persons with disabilities

Action: Increase supply of affordable, accessible housing for persons with disabilities.

Impediment #4: Lack of public or private investments in certain neighborhoods

Action: Make investments in targeted and segregated neighborhoods to increase opportunity while protecting residents from displacement.

Impediment #5: Insufficient access to opportunity for residents of supported housing

Action: Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing. Support development of affordable housing in areas with good access to opportunities.

Impediment #6: Lack of education regarding affordable housing and fair housing enforcement

Action: Increase access to information and resources on fair and affordable housing

II.   COMMUNITY PROFILE

Introduction

The 2010 Census, 2013-17 American Community Surveys, and several other official sources were utilized for the preparation of this report. These sources include information released as part of the Home Mortgage Disclosure Act (HMDA), Community Reinvestment Act (CRA) reports, Comprehensive Housing and Affordability Strategy data, as well as official City of Dallas planning and reporting documents. This report documents the findings for the City of Dallas and intends to provide meaningful, data-driven insight for the City.

The American Community (ACS) is particularly useful because it offers the most recent estimates for demographic and population data. According to the ACS General Handbook, "While the main function of the U.S. decennial census is to provide counts of people for the purpose of congressional apportionment, the primary purpose of the American Community Survey (ACS) is to measure the changing social and economic characteristics of the U.S. population—our education, housing, jobs, and more. Every 10 years since 1790, Congress has authorized the government to conduct a national census of the U.S. population, as required by the U.S. Constitution. In every decennial census from 1940 through 2000, two questionnaires were used to collect information: a "short form" with only basic questions such as age, sex, race, and Hispanic origin; and a "long form" with the basic short-form questions plus additional questions on social, economic, and housing characteristics. Only a subset of households received the long-form questionnaire—about one in every six in 2000. After the 2000 Census, the long form was replaced by the ACS, which continued to collect long-form type information throughout the decade. The ACS includes not only the basic short-form questions, but also detailed questions about population and housing characteristics. It is a nationwide, continuous survey designed to provide communities with reliable and timely social, economic, housing, and demographic data every year" (U.S. Census Bureau, 2018).

CDBG Eligible Tracts

HUD's income limits apply to the Community Development Block Grant (CDBG) program, with three separate eligibility brackets:
1. extremely low income (below 30% Area Median Income, or AMI),
2. very low income (between 30% and 50% AMI), and
3. low income (from 50% to 80% AMI).

The map below shows all 379 Dallas census tracts, with the relationship between each tract's 2016 median income and Area Median Income indicated by different shades of purple. Many of the City's lowest income tracts could be found in south Dallas, with relatively fewer north Dallas tracts eligible for CDBG funding. A cluster of CDBG eligible tracts can, however, be found in northeast Dallas, near Garland. Conversely, some portions of far-south Dallas are at or above AMI, also eschewing the general trend.

Legend

Median Income

	30%AMI to less than 50%AMI
	50%AMI to less than 80%AMI
	80%AMI to less than 100%AMI
	100%AMI and above
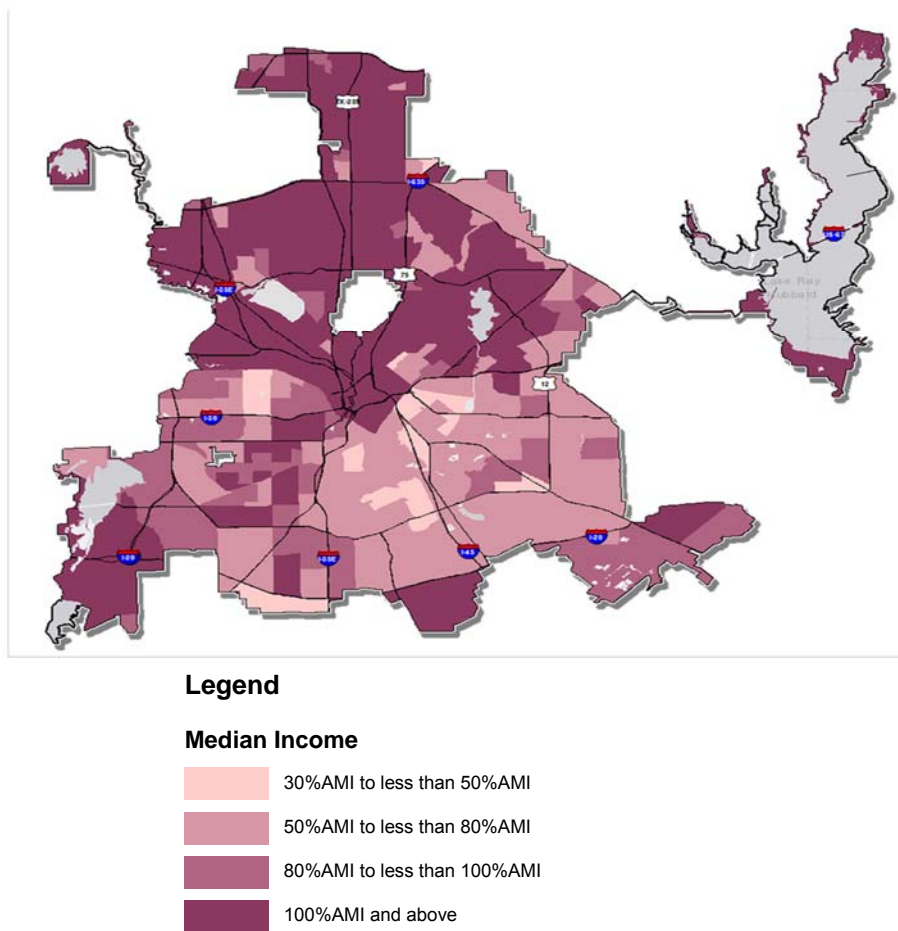
Figure 1: City of Dallas census tracts by median income in relation to AMI, 2016

Population, Race, and Ethnicity

At the time of the 2017 American Community Survey (Table 3), the population in Dallas reached an estimated total of 1,300,122. The 2010 Census shows a Dallas population of 1,197,816, which means Dallas experienced an estimated population increase of 102,306 persons over the seven-year period from 2010 to 2017. According to the ACS 2017, the racial makeup of the community was about 29% white, Non-Hispanic. Over one quarter of Dallas residents identified as black or African American (25.4%), and 3.9% of the population was Asian. About one percent of Dallasites were American Indian or Alaskan Native (1.2%), and 41.7% of the population across all races identified as Hispanic.

Between the 2010 census and 2017 ACS, Dallas's black population grew by 10.3%. During that period, the population of Hispanic or Latino origin increased by 9.7%, the Asian population became 49.4% larger, and the American Indian/Alaskan Native population grew by 92.6%. These demographic changes reflect an increased need for fair housing education and outreach as population changes occur.

Table 3. Population, Race, and Ethnicity 2010 and 2017 Census Count Changes - Dallas, TX

	2010 Population	% of Total 2010 Population	2017 Population	% of Total 2017 Population	2010 to 2017 Increase
Total Population	1,197,816	100%	1,300,122	100%	102,306
Black or African American	298,993	25.0%	330,062	25.4%	31,069
Asian	34,263	2.9%	51,200	3.9%	16,937
American Indian and Alaskan Native	8,099	0.7%	15,602	1.2%	7,503
White, Non-Hispanic	345,205	28.8%	377,990	29.1%	32,785
Two or More Races	31,733	2.6%	33,696	2.6%	1,963

Table 3: Dallas population in 2010 and 2017

Spatial Patterns

By Race and Ethnic Group

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 2). 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 west 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 and Pacific Islander (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.
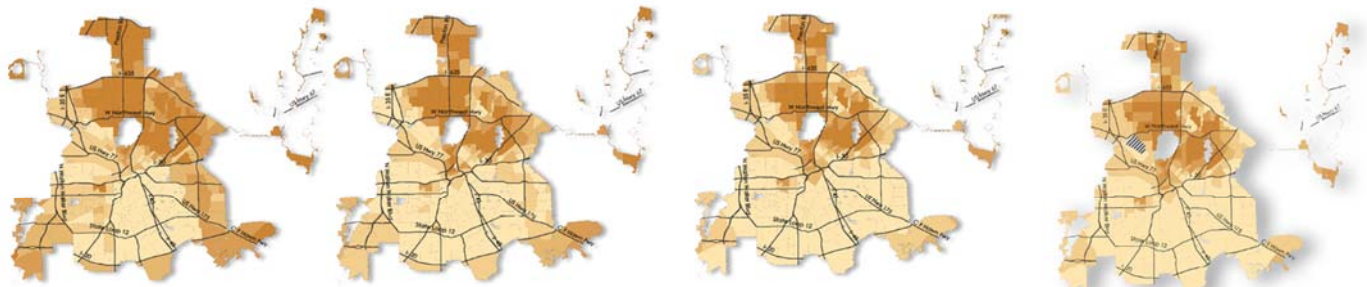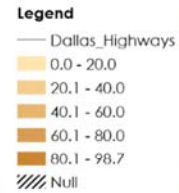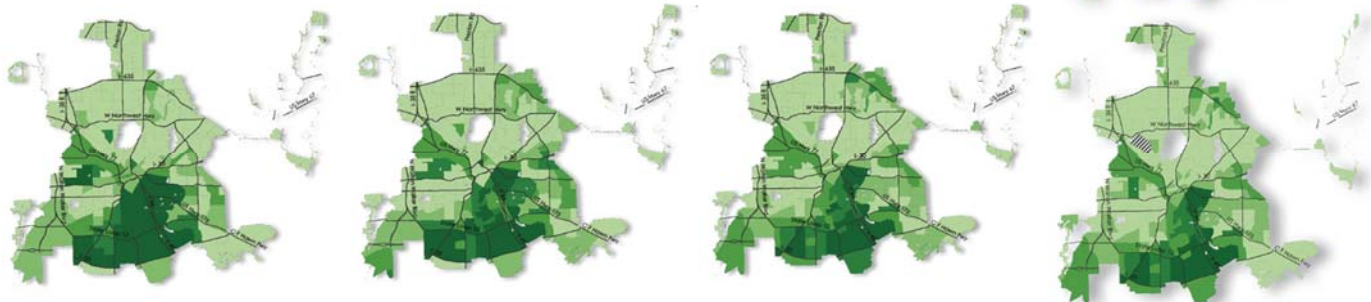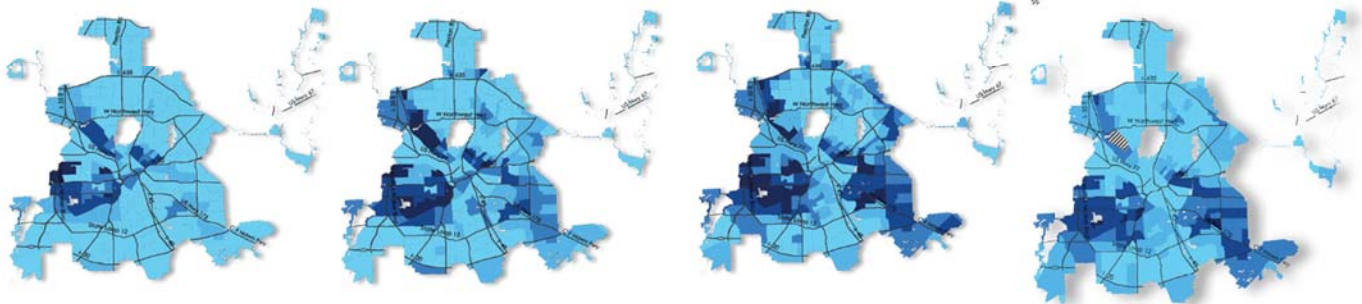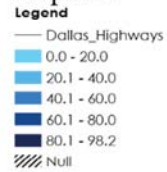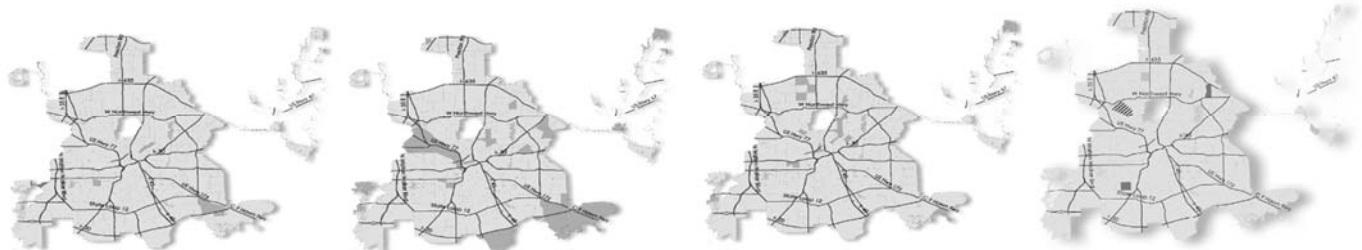
Figure 2: Percent of each racial and ethnic group in Dallas census tracts from 1990 to 2015

Non-White/White Segregation

Dallas registered high levels of non-white/white segregation. Figure 3 illustrates this spatial divide and the significantly greater concentration of the non-white population in the southern sector of Dallas and a considerable cluster of white residents in north Dallas. The concentration of the non-white population was 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 were black (southern areas) and Hispanic (eastern and western areas).

Dallas had very few areas of relative *integration*[5] that is, where the racial composition of the neighborhood appears comparable to the city's overall composition. Integrated areas occurred 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.

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
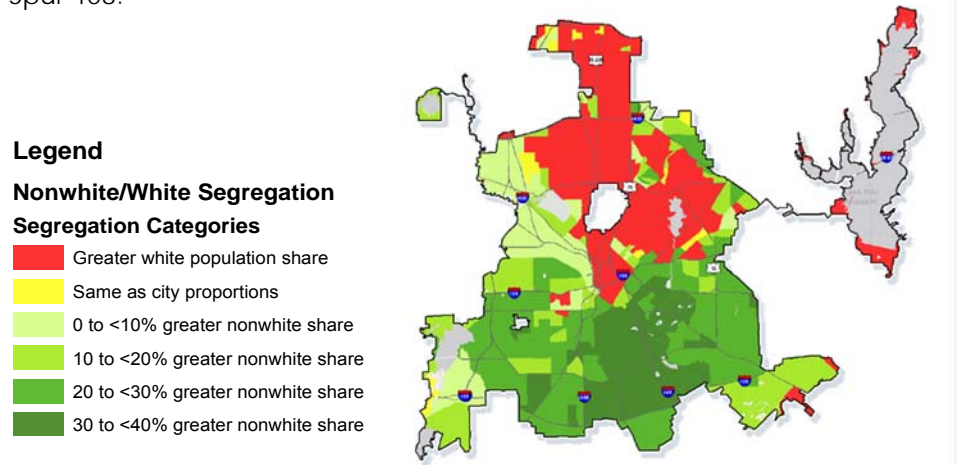
Figure 3: Non-white/white segregation in Dallas

Black/Non-Black Segregation

Description	Category	
Nonwhite share more than 40% greater than jurisdiction	7	
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	1	

Figure 4 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 black residents for the whole jurisdiction. The highest levels of black segregation also occurred in the Fair Park area and east Oak Cliff. Other pockets with significant concentrations occurred 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.

Legend
- Dallas_Highways
- Greater non-black population share
- Integration/appropriate representation
- 0 to <10% greater than city avg
- 10 to <20% greater than city avg
- 20 to <30% greater than city avg
- 30 to <40% greater than city avg
- More than 40% greater than city avg
- Null
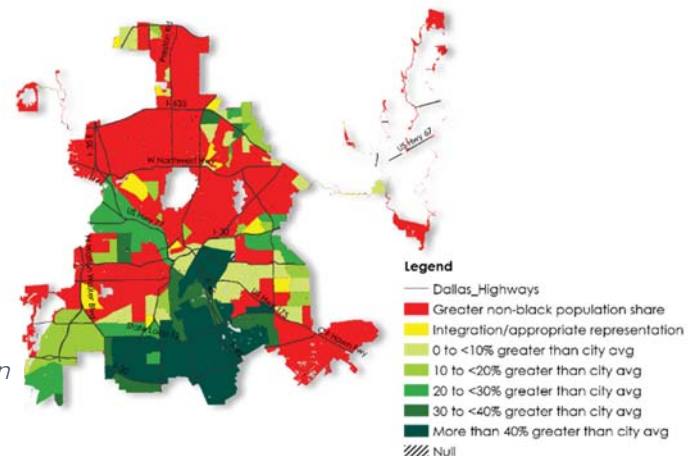
Figure 4: Black/non-black segregation

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[5] 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.

Hispanic/Non-Hispanic

Similar segregation patterns occurred in Figure 5 for the Hispanic population where clusters of census tracts with a concentration of Hispanics at least 40% greater than the jurisdictional proportion were also present. These clusters are visible primarily in west Dallas, northwest Dallas near I-35E, east Dallas. Some isolated pockets of concentration were also found in north Dallas near I-635.
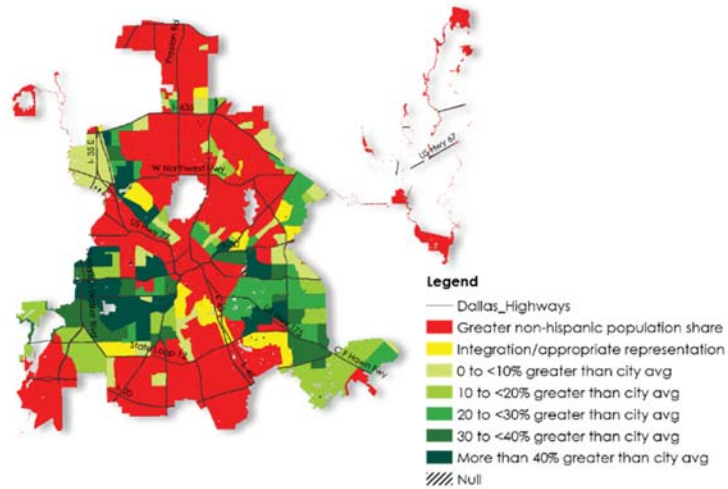
Figure 5: Hispanic/non-Hispanic segregation

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Racially and 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. 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). The poverty rate is based on the number of individuals living at or below the poverty line within a given census tract.

In 2015, R/ECAP tracts (in pink) were primarily located in south Dallas; east, west and central Oak Cliff; and the Red Bird area (Figure 6). 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.

2015   **2016**
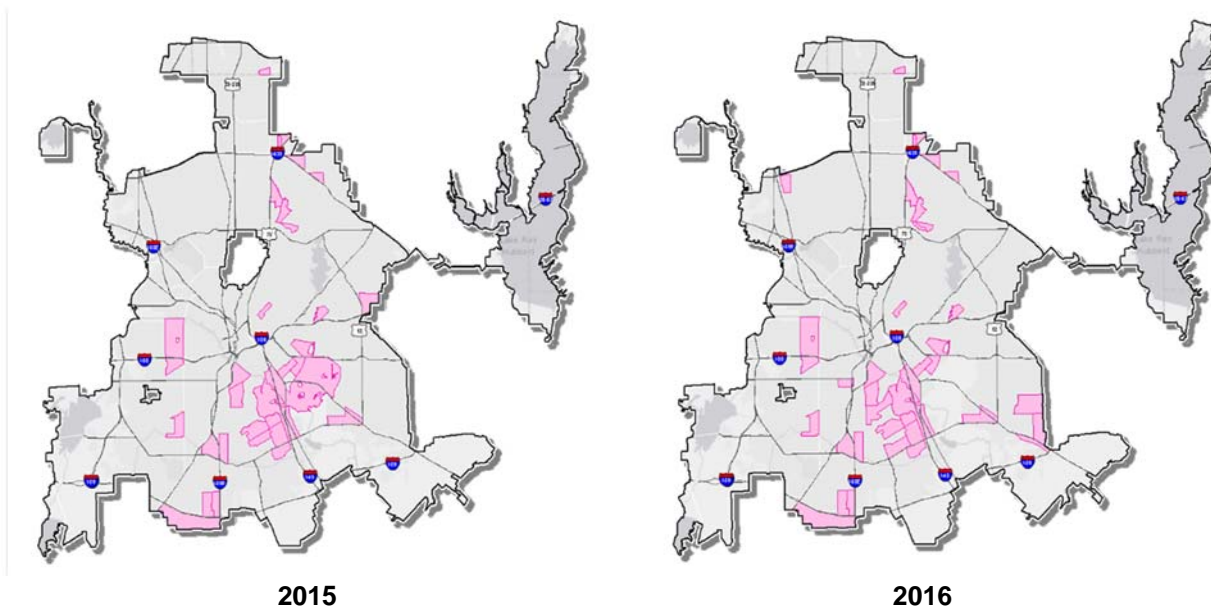
Figure 6: Dallas R/ECAPs in 2015 and 2016

Figures 7 and 8 show the demographics (race, ethnicity, family type and national origin) of Dallas and the DFW region R/ECAPs. Because HUD defines a R/ECAP as at least 50% nonwhite, R/ECAPs in both Dallas and the region remain predominantly black and Hispanic. While the definitional threshold requires 50% minority, the R/ECAPs in Dallas and the region appear to be significantly minority-concentrated. On average, a Dallas R/ECAP has a 93.5% non-White population.

Black residents accounted for a greater share of nonwhite R/ECAP population in Dallas (48%) than in an average R/ECAP in the DFW region as a whole (37%). The average regional R/ECAP had a greater Hispanic share (47%), which makes sense given Hispanics typically form the core of the population within the R/ECAPs developing in the suburbs. While Hispanic households accounted for a lesser share than black households in R/ECAPs, they still represented a large share of the non-white population in an average Dallas R/ECAP (43%). In Dallas, the share of families in R/ECAPs (55.5%) was slightly lower than the regional average (56.7%)
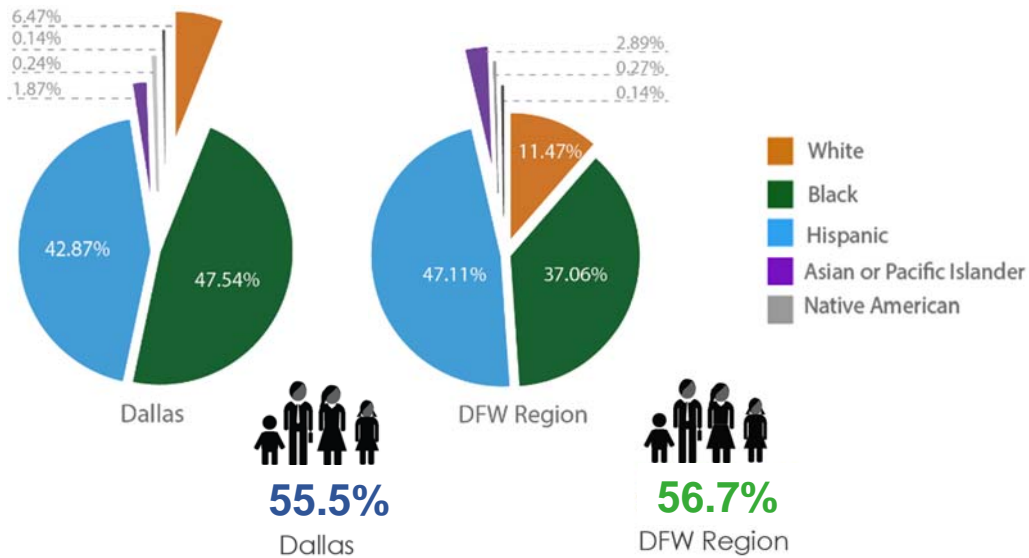
Figure 7: Racial/ethnic shares and family with children concentration in R/ECAPs for Dallas & DFW

Foreign-born individuals from Mexico represented around 20% of the foreign-born population in R/ECAPs in both Dallas and the region (Figure 8). Regionally, Hispanic and black residents accounted for over 84% of R/ECAP residents, but only 41% of the region's residents are Hispanic and black. Mexican immigrants represented over 20% of R/ECAP residents but less than 10% of the regional population. About 57% of the regional R/ECAP households had children, as opposed to 51% of the overall regional households.
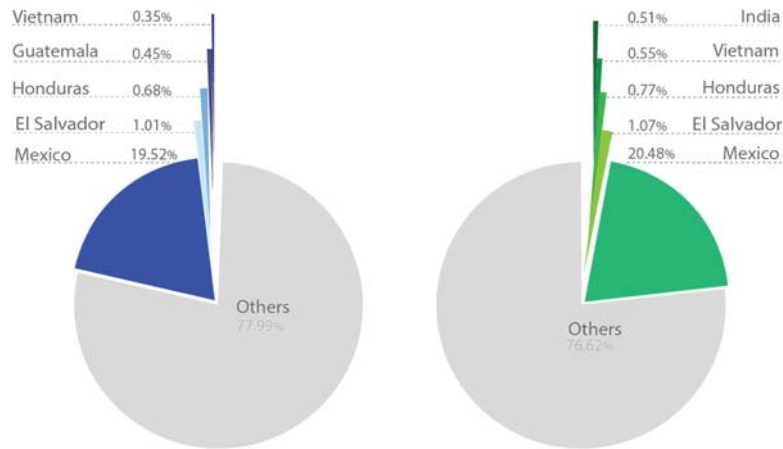
Figure 8: Foreign-born population proportion in R/ECAPs, Dallas and DFW region

Key Findings

Figure 9 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 tended to be characterized by not only extreme poverty but by racial segregation (highest segregation grades, nonwhite concentration above 90%)
- R/ECAPs tended to emerge as a result of poverty increasing, as opposed to a nonwhite population increase.

1990   **2000**   **2010**

2013   **2015**   **2016**
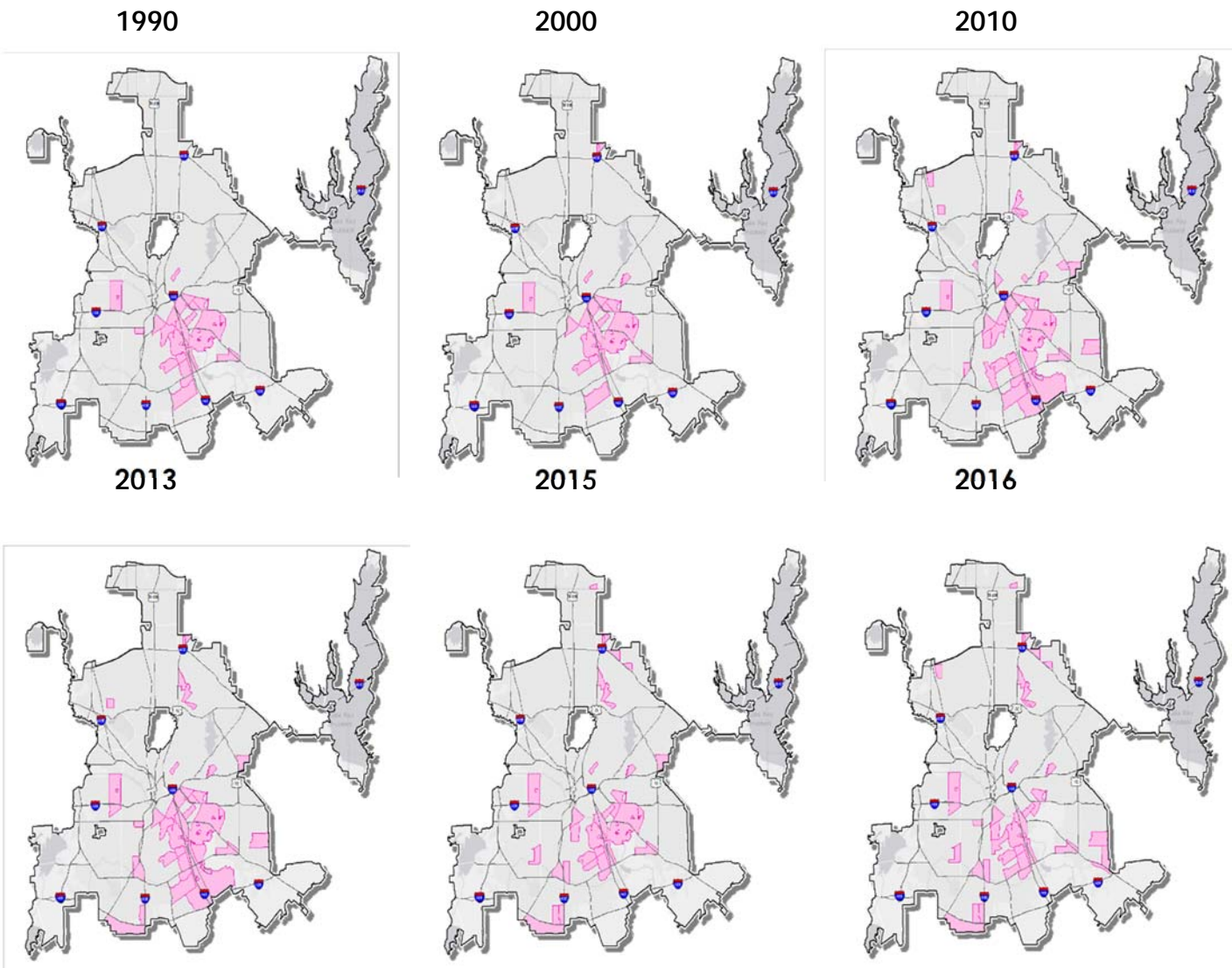
Figure 9: R/ECAPs patterns 1990-2016, Dallas

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 re-designated 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 re-designated 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 Dallas. While some of these remained through 2016 (35%), many others lost their R/ECAP designation due to a declining poverty rate. The improvements in many of these 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.

Table 4 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 lost their R/ECAP designation, but new emerging areas of concern seemed 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 there is an area near Pleasant Grove where a R/ECAP tract has persisted throughout the decade. The area near Kiest Park had a new R/ECAP emerging and the area between US 67, I-35E and DeSoto had numerous emerging R/ECAPS, especially near highways. These new R/ECAP locations emerged due to an increase in their poverty rates. As such these tracts, already characterized by a high non-white concentration (and likely segregation), also experience an increase in poverty.

The definition of a racially/ethnically-concentrated area of poverty (R/ECAP) as developed by the HUD Office of Policy Development and Research (OPDR) requires R/ECAPs census tracts to have a minority population of 50% or more and an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower). Analyzing the concentration of minorities in high poverty areas assists in the review of access to housing.

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015
48113002701	1	1	1	1	1	1	6	6	55	99
48113004100	1	1	1	1	1	1	6	5	45	98
48113008604	1	1	1	1	1	1	6	6	55	98
48113008802	1	1	1	1	1	1	6	6	50	98
48113009304	1	1	1	1	1	1	6	6	57	98
48113020500	1	1	1	1	1	1	6	5	55	91
48113008603	1	1	0	1	1	1	5	6	51	100
48113004000	1	1	0	1	1	1	5	6	46	99
48113008701	1	0	1	1	1	1	5	6	44	99
48113019212	0	1	1	1	1	1	5	6	46	98
48113003800	1	1	0	1	1	1	5	5	41	97
48113011500	1	1	1	1	1	0	5	6	39	97
48113012208	0	1	1	1	1	1	5	5	42	95
48113001503	1	1	0	1	1	1	5	4	54	86
48113019213	0	1	1	1	1	1	5	3	45	79
48113011401	1	1	1	1	0	0	4	6	35	97
48113007820	0	0	1	1	1	1	4	4	46	90
48113020300	1	1	1	1	0	0	4	5	34	90
48113003400	1	1	1	1	0	0	4	4	26	88
48113007815	0	0	1	1	1	1	4	4	50	87
48113002702	1	1	0	1	0	0	3	6	36	99
48113004900	0	0	1	0	1	1	3	6	53	99
48113008900	1	0	1	1	0	0	3	6	39	97
48113003901	0	0	1	0	1	1	3	6	53	96
48113011105	0	0	0	1	1	1	3	5	40	96
48113012302	0	0	1	1	1	0	3	5	38	94
48113006900	0	0	0	1	1	1	3	5	49	92
48113011800	0	0	1	1	0	1	3	5	46	91
48113016605	0	0	0	1	1	1	3	5	44	90
48113004700	1	0	0	1	0	1	3	5	41	89
48113006002	0	0	0	1	1	1	3	4	41	81
48113007823	0	0	0	1	1	1	3	3	41	77
48113011104	0	0	0	0	1	1	2	6	46	100
48113006001	0	0	1	1	0	0	2	6	31	99

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015
48113020200	0	0	1	1	0	0	2	6	29	99
48113010804	0	0	0	0	1	1	2	5	46	97
48113005902	0	0	0	0	1	1	2	5	43	96
48113018503	0	0	0	0	1	1	2	5	42	93
48085031720	0	0	0	0	1	1	2	4	43	87
48113019016	0	0	0	0	1	1	2	3	40	75
48113009610	0	0	1	0	0	1	2	3	40	70
48113009804	0	0	1	1	0	0	2	3	39	67
48113008703	0	0	0	0	1	0	1	6	39	99
48113005500	0	0	0	0	0	1	1	6	41	98
48113008704	0	0	0	0	0	1	1	6	42	98
48113001204	0	0	1	0	0	0	1	5	17	95
48113005700	0	0	1	0	0	0	1	6	36	95
48113011702	0	0	0	0	0	1	1	5	42	92
48113007818	0	0	0	0	0	1	1	5	40	90
48113000405	0	0	1	0	0	0	1	4	29	81
48113012210	0	0	1	0	0	0	1	4	31	81
48113007819	0	0	1	0	0	0	1	3	27	80
48113001600	0	0	1	0	0	0	1	1	29	57
48113014204	0	0	1	0	0	0	1	1	43	46

Table 4: R/ECAPs over time: change in poverty and nonwhite concentration, Dallas

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

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: **1**

Change in R/ECAPs over the years

Figure 10 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.
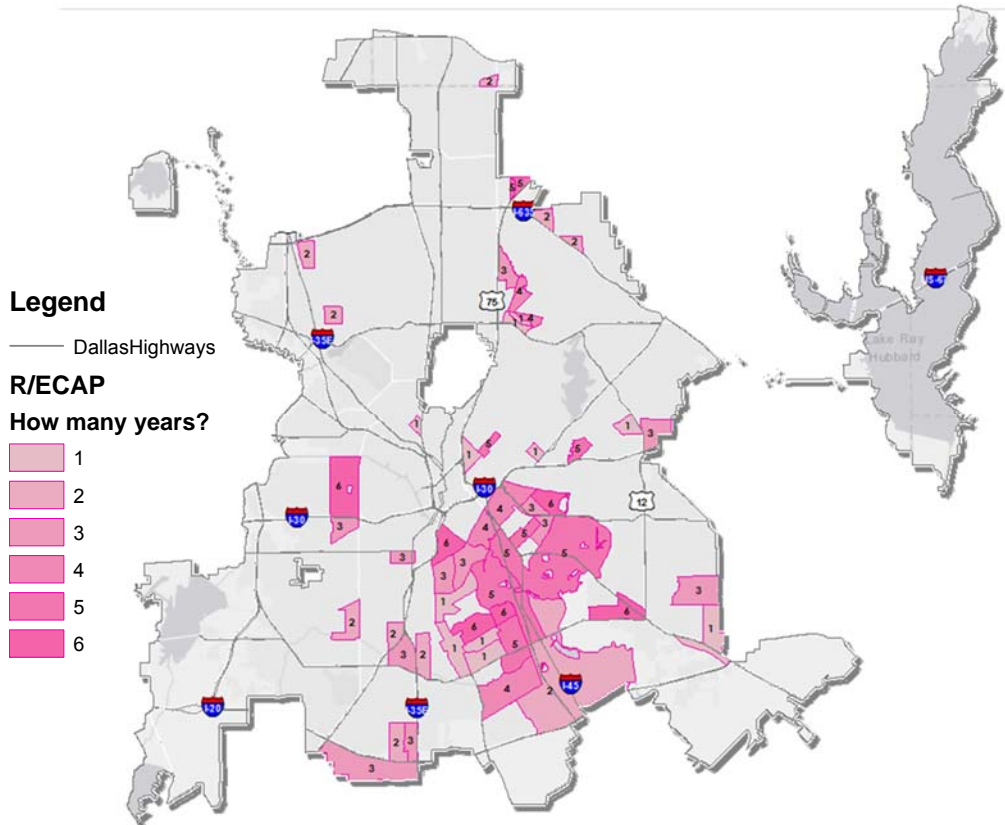
Figure 10: Years as R/ECAP for Dallas census tracts

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 (Figure 11). 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 (2016)	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2016	2016
48113011500	1	1	1	1	1	0	5	6	39	97

Figure 11: Bonton R/ECAP revitalization

Considerable efforts and resources were dedicated to revitalizing 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 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).*

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.

Figure 12 displays 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 R/ECAP census tracts delineated in pink.

While not all census tracts with a relatively high number of single-female-led families were R/ECAPs, most R/ECAP census tracts accounted 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
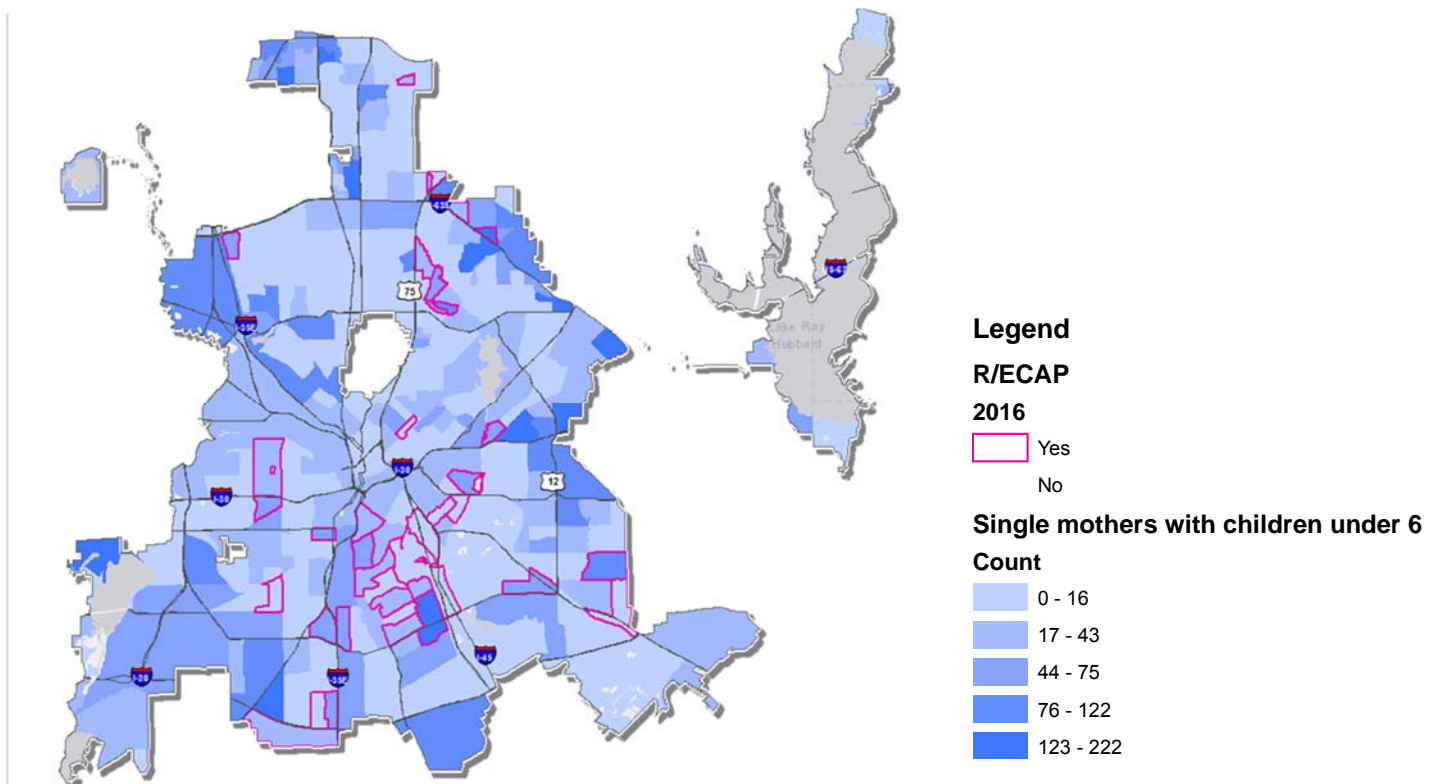
Figure 12: Single female-headed families with children and R/ECAPs, Dallas

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 Analysis of Impediments, 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 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) (Figure 13). Most of the R/ECAPs found in Dallas had a share of nonwhite residents that is 30%-40% greater than the city average.
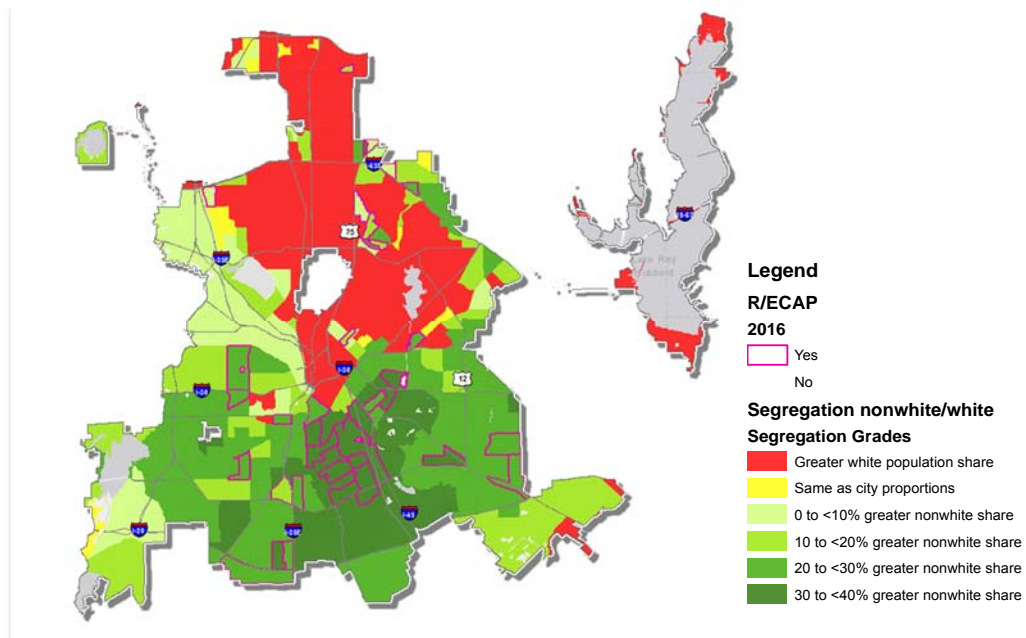
Figure 13: Segregation patterns and R/ECAPs, Dallas

Housing Choice Voucher Families and R/ECAPs

Housing Choice Voucher (HCV) families have tended to disproportionately be members of protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. As a result, 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. Dallas is home to 10,531 HCV families.

As of 2016 (Figure14), 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 of key facts

- Of the 379 census tracts in Dallas, 36 are R/ECAPs
- The 36 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)
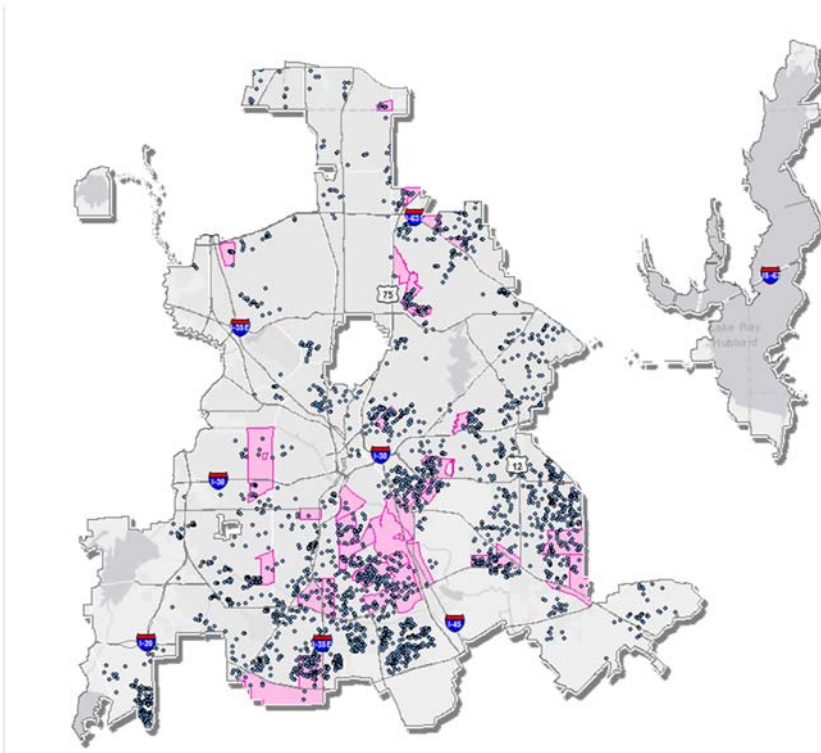
Figure 14: HCV residential patterns and R/ECAPs, Dallas

Supportive Housing and R/ECAPs

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. 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.

Dallas contains nine supportive housing facilities for the elderly (Section 202) and three for persons with disabilities (Section 811) (Figure 15). Mabel Meshack White Manor (Section 202), which had the second largest number of subsidized units, is located within a R/ECAP census tract that had a poverty rate substantially above the extreme poverty threshold of 40%. While all other properties are located outside of tracts with R/ECAP designation, eight of the 11 supportive housing developments are located in census tracts with a poverty rate that was above 20%. Fowler Christian Apartments II and III, which contained the highest proportions of HUD-assisted households with a disability (18% and 11%, respectively) among 202 supportive housing developments, are located in the census tract that had the lowest poverty rate and non-white concentration. These two developments also accounted 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 appear in south Dallas, but most are located outside tracts designated as R/ECAPs.
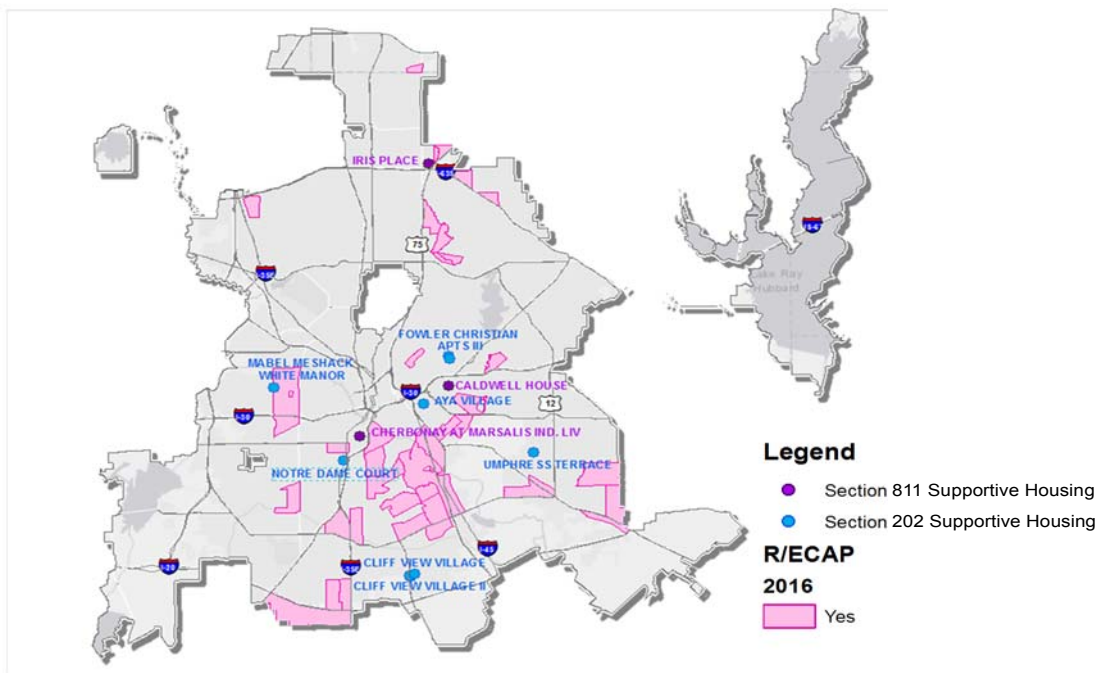
Figure 15: Sections 202 and 811 supportive housing developments and R/ECAPs, Dallas

Household Characteristics

According to the 2017 ACS, 497,672 households reside in Dallas. Of all Dallas households, 57.5% are family households, and the remaining 42.5% are considered non-family households. Figure 16 breaks household types down further, showing families with two married parents, a single male parent, or a single female parent.
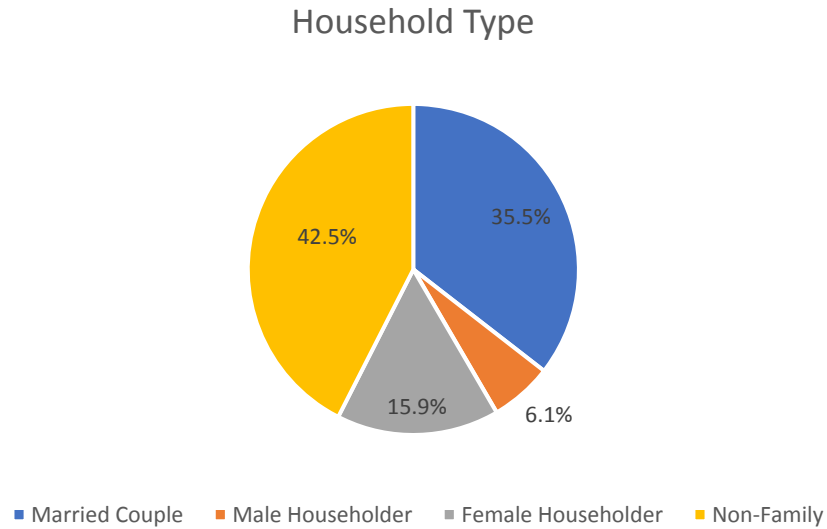
Household Type

Figure 16: Dallas household types

Figure 17 shows a breakdown of household size derived from the 2017 ACS. Single-person households comprised over one-third of all Dallas households, while two-person households were just over 29% of the total. Roughly one in seven households were composed of three people, and about 22% of Dallas households were made up of four-or-more residents.

Dallas Household Size
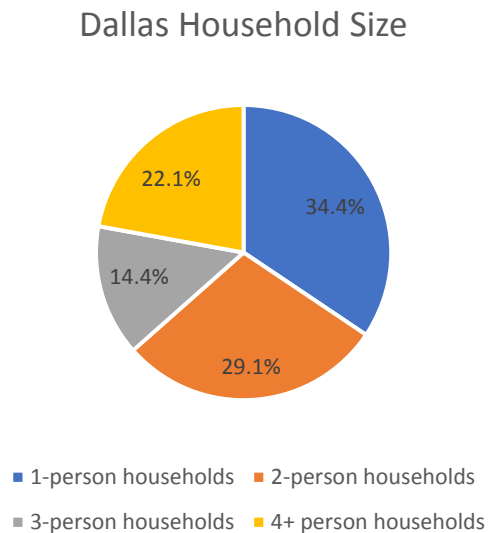
Figure 17: Dallas household size

Income Characteristics

Dallas is located in the Dallas, TX HUD Metro Fair Market Rent (FMR) Area. The Dallas, TX HUD Metro FMR Area contains the following counties: Collin, Dallas, Denton, Ellis, Hunt, Kaufman, and Rockwall.

HUD's FY2018 Income Limits were based off of ACS median household income estimates (Table 5). Extremely Low (30%) Income limits for the Dallas, TX HUD Metro FMR Area were set at $23,160, the Very Low Income (50%) Income limit is placed at $38,600, and the Low Income (80%) limit is defined as those earning no more than $61,760. All figures are based on a household size of four (4) and a 2018 Area Median Income of $77,200 for the Metro Area.

FY 2018 Income Limit Category	1 Person	2 Person	3 Person	*4 Person*	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30%)	$16,250	$18,550	$20,850	*$23,150*	$25,050	$26,900	$28,750	$30,600
Very Low Income (50%)	$27,050	$30,900	34,750	*$38,600*	$41,700	$44,800	$47,900	$51,000
Low Income (80%)	$43,250	$49,400	55,600	*$61,750*	$66,700	$71,650	$76,600	$81,550

Table 5: FY 2018 income limits for the Dallas, TX HUD FMR Area

While the Metro Area Median Income for 2018 was set at $77,200, Median Household Income for Dallas County alone was just $53,626, according to the 2017 ACS. Within the city limits of Dallas, Median Household Income was lower still, at $47,285. However, this is higher than at the time of the 2010 Census when Median Household Income for Dallas was $41,682. Table 6 compares 2017 Median Household Income for each of the seven counties within Dallas's Metro FMR Area.

2017 Median Household Incomes
Dallas, TX Metro Area

County Within Dallas, TX Metro Area	Median Household Income
Collin County	$90,124
Dallas County	$53,626
Denton County	$80,290
Ellis County	$67,371
Hunt County	$49,319
Kaufman County	$63,926
Rockwall County	$93,269

Table 6: Median household income for Dallas Metro counties

Data from the 2017 ACS provides further context regarding income levels in Dallas (Table 7). Of 499,672 total households in Dallas, 25.8% (128,387) earned less than $25,000 annually, with another 26.4% (129,382) earned between $25,000 and $50,000. For the middle-and-upper-income brackets in 2017, 26.8% (133,363) earned between $50,000 and $100,000, while 21.1% (104,998) of households earned over $100,000. Approximately 20% of Dallas households received Social Security Income, while 9.5% enjoyed Retirement Income. About 4.5% of households benefitted from Supplemental Security Income, as opposed to 15.4% that utilized the Supplemental Nutrition Assistance Program (SNAP).

INCOME LEVEL	# OF HOUSEHOLDS	% OF HOUSEHOLDS
Less than $10,000	41,800	8.4%
$10,000 to $14,999	26,872	5.4%
$15,000 to $24,999	59,715	12.0%
$25,000 to $34,999	57,227	11.5%
$35,000 to $49,999	72,155	14.9%
$50,000 to $74,999	85,591	17.2%
$75,000 to $99,999	47,772	9.6%
$100,000 to $149,99	48,269	9.7%
$150,000 to $199,999	21,398	4.3%
$200,000 or more	35,331	7.1%

Table 7: Household income levels in Dallas

Figure 18 shows the poverty level for Dallas census tracts in 2013, with the highest levels of poverty evident in south Dallas. This is especially true in and around Oak Cliff, where some of the highest poverty rates are found. Relatively elevated poverty can also be found in portions of northeast Dallas near Garland, Vickery Meadow and in parts of west Dallas.
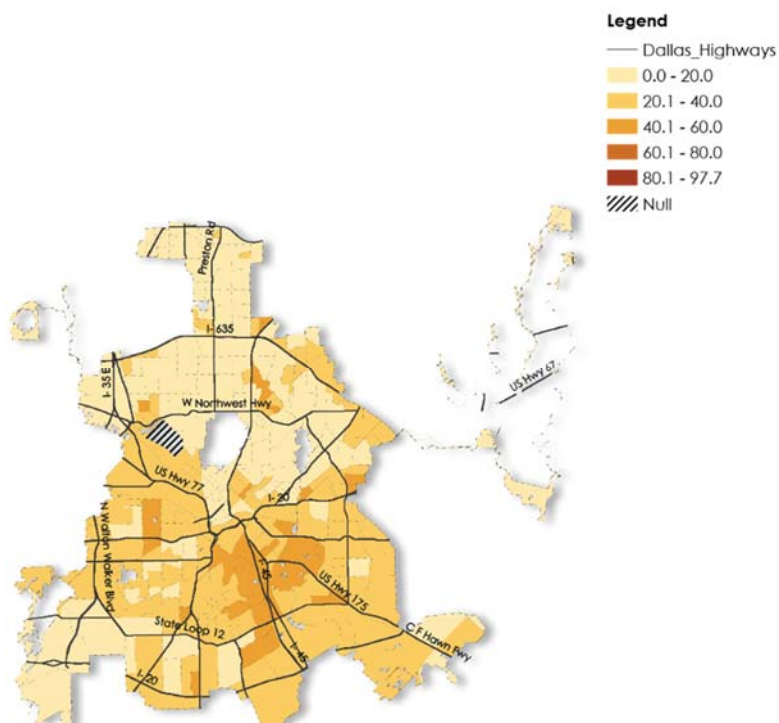
Figure 18: Households in poverty by census tract, Dallas

Poverty rates by race/ethnicity, education level, and age group can be found in Figure 19 below. Drawn from ACS 2017, these numbers show that non-white populations and individuals without a high school diploma are far more likely to incur poverty than other Dallas residents. Based on the 2017 estimate, over one-third of Dallas children live in poverty, which indicates that families with children undergo particular hardship in relation to the rest of the population.

Race/Ethnicity	Poverty Rate
White, Non-Hispanic	9.6%
Black	30.0%
Hispanic	25.9%
Asian	20.0%
American Indian	28.0%

Education Level	Poverty Rate
No High School Diploma	28.4%
High School Graduate	22.1%
Some College, No Diploma	14.7%
Bachelor's Degree or Higher	5.6%

Age Group	Poverty Rate
Under 18	34.2%
18-34	20.0%
35-64	16.7%
65+	14.1%

Figure 19: Poverty level in Dallas by race/ethnicity, education level, and age group

Educational Attainment

According to the 2017 ACS, about 24% of Dallas residents 25 or over had not graduated from high school (including equivalency). Nearly 40% of Dallasites finished high school but did not complete any further degrees, while over 24% had received either an Associate's or Bachelor's degree. About 12% of Dallas's 25 or over population completed a Graduate or Professional degree of some sort. Figure 20 provides further specifics regarding educational attainment among Dallas residents.
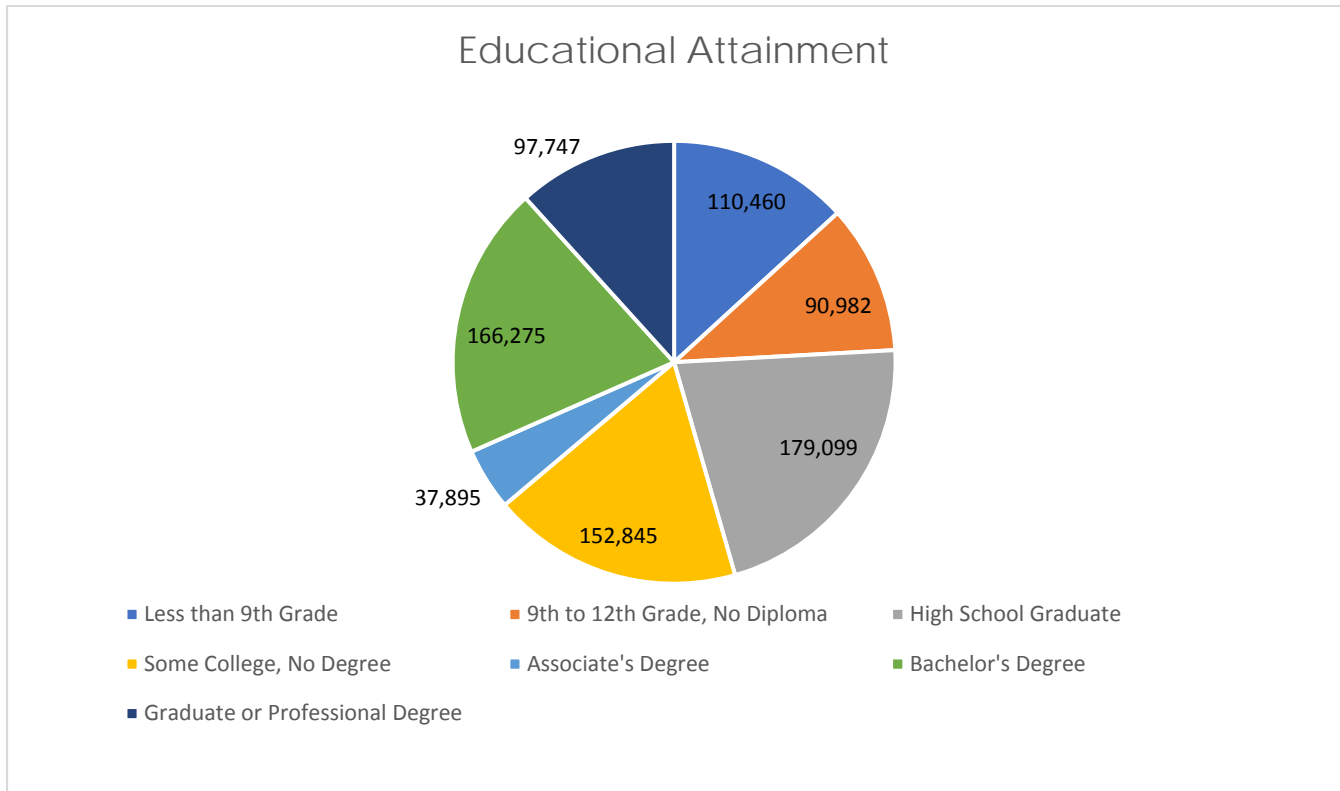
Figure 20: Educational Attainment in Dallas

The estimated total school enrollment for the population aged 3 years and over in Dallas was 325,896 in 2017 (ACS, 2017). The majority (over 64%) of that enrollment comes from students between first and twelfth grade. About 22% of individuals enrolled in school are students who have already completed high school, while 13% of students are enrolled in either pre-school or Kindergarten. Figure 21 provides more information about school enrollment in Dallas.
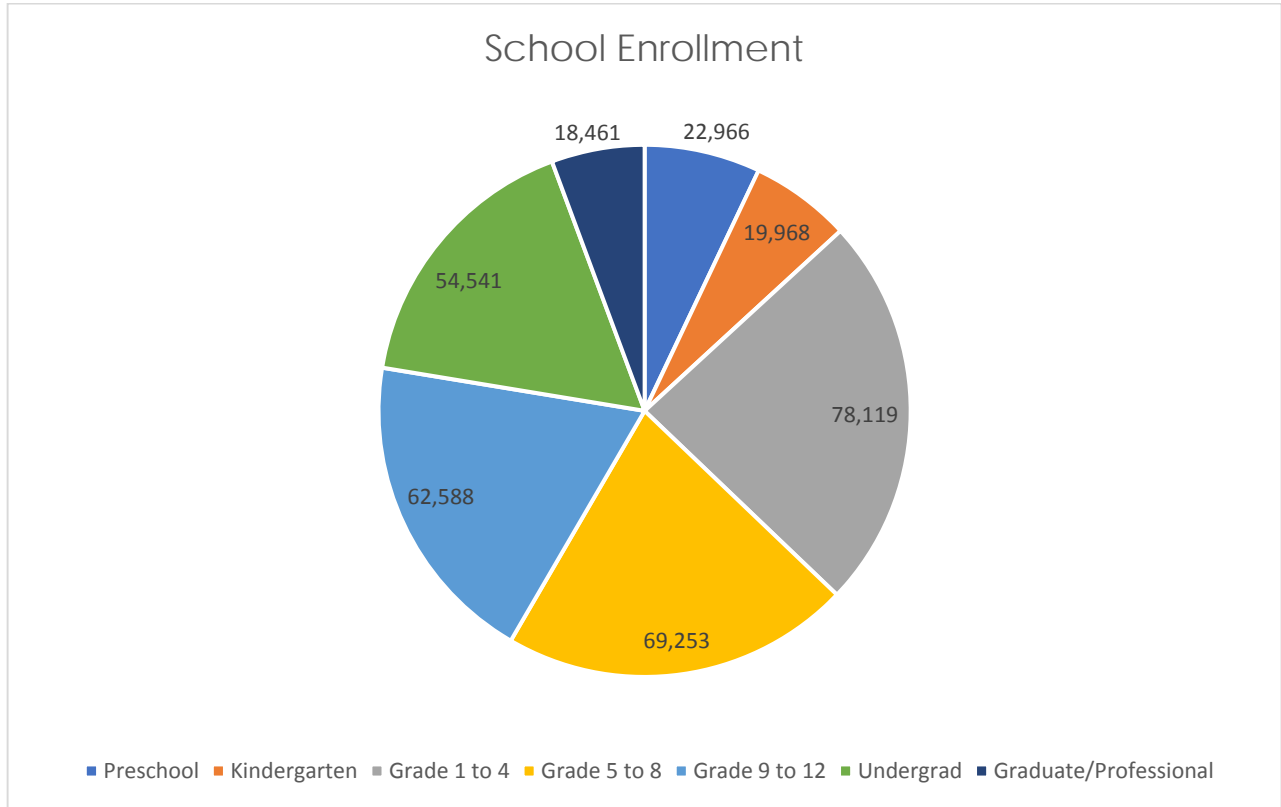
Figure 21: School enrollment in Dallas

Quality of Education

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 lived in census tracts with school proficiency scores lower than 39, while 31% of the Asian/PI population and about 28% of the white population lived in the same census tracts (Table 8). On the other hand, 24% of the Asian/PI and almost 34% of the white population lived in census tracts with school proficiency scores greater than 80. Only about 5% of the Hispanic and 4% of the black population lived in similar census tracts; however, the disparities that existed between different races and ethnicities in Dallas surpassed those present at the regional level.

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 8: School proficiency index scores across groups, Dallas
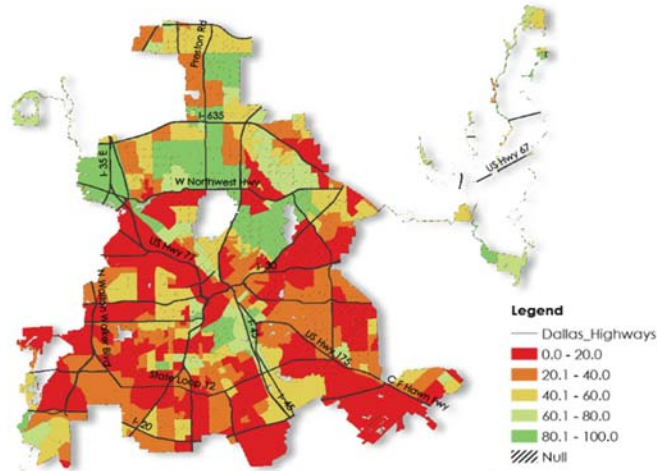
Figure 22: School proficiency index: spatial patterns in the City of Dallas

While the school proficiency index does not provide a consistent spatial pattern, it does offer trends (Figure 22). In general, the school proficiency patterns match segregation patterns and the high-performing schools appeared in north Dallas and the low-performing schools were concentrated in east, west and south Dallas. However, some highly segregated Oak Cliff and even south Dallas neighborhoods also received high school proficiency scores. Unfortunately, the emerging R/ECAP areas in north Dallas appeared to coincide with low school proficiency scores. In Dallas, the low-performing school locations match patterns of both black and Hispanic segregation.

Employment

The Dallas population of persons aged at least 16 years old included 998,447 individuals in 2017. Approximately 68.3% of that population participated in the labor force with a 5.9% unemployment rate. Unemployment among white, non-Hispanic residents was at just 3.7%, while unemployment for black Dallasites was around 10%. Just over 5% of Hispanics and Asians were unemployed. Unemployment for persons with disabilities in Dallas was around 13%.

Figures 23 and 24 provide context regarding changes since 1990 to the labor market in the Dallas-Fort Worth-Arlington, TX MSA and Dallas County, both of which include Dallas. The labor force has grown substantially in both the Dallas-Fort Worth-Arlington MSA and Dallas County, especially since the recession that began to wind down around 2010. While growth since 1990 has been more dramatic in the larger MSA, Dallas businesses enjoy access to a significantly larger and more competitive pool than ever before.
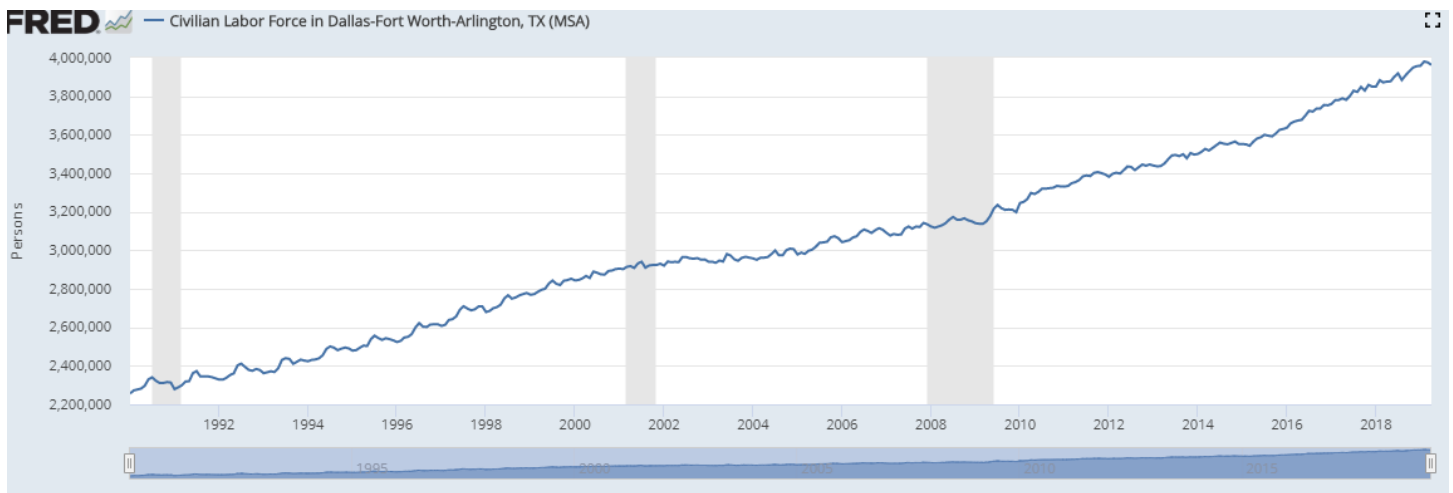
Figure 23: Size of the civilian Labor Force in the Dallas-Fort Worth-Arlington, TX MSA between 1990 and 2019
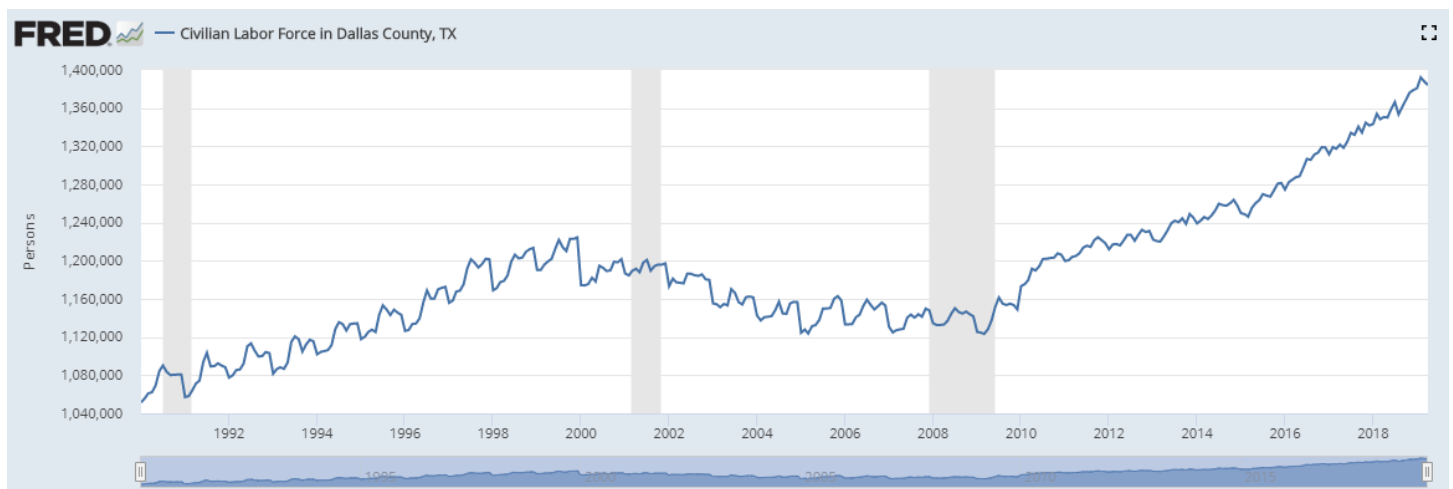
Figure 24: Size of the civilian Labor Force in Dallas County between 1990 and 2019

Figures 25 and 26 show that despite the presence of a much larger labor pool the unemployment rate has fallen dramatically since the recession. The most recent numbers put unemployment at less than half its recession-era peak in both the MSA and, more specifically, in Dallas County.
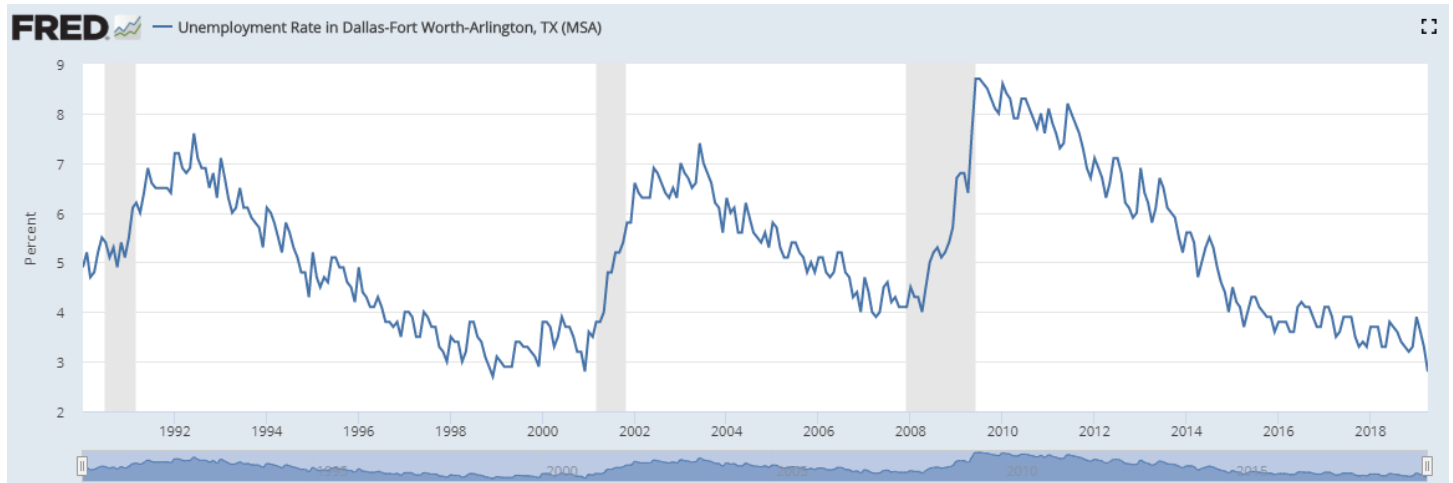
Figure 25: Unemployment rate in the Dallas-Fort Worth-Arlington, TX MSA between 1990 and 2019
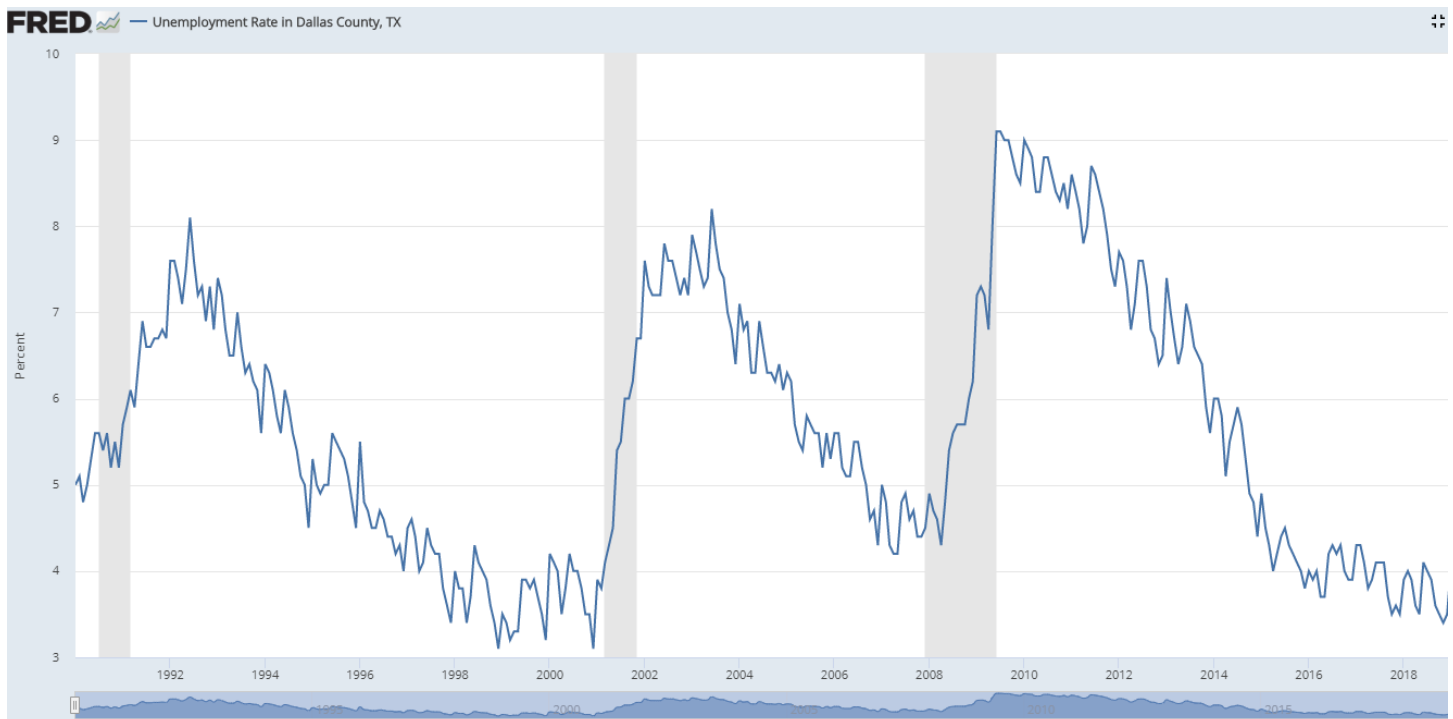
Figure 26: Unemployment rate in Dallas County between 1990 and 2019

The job proximity index provides a description of the relative accessibility of 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, Dallas appeared to offer greater access to jobs than most of the surrounding area. Despite that fact, the relative access to jobs varied greatly across population groups. The data shows that white and Asian/PI households tended to live in areas of significantly greater job access than black and Hispanic households. Indeed, 30% of black households resided in the lowest performing areas, with the lowest access to jobs (score below 20), while 26% of white households lived in the highest performing areas (score greater than 80).

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 9: Job proximity index scores across groups, Dallas

Figure 27 shows the jobs proximity index scores for each census tract in Dallas. The scores vary widely with higher proximity scores in north and northwest Dallas, while the scores improved along the freeway corridors in these areas. South and particularly southeast Dallas scored poorly for jobs proximity outside most freeway corridors. Some developing R/ECAPs in north and east Dallas had low jobs proximity index scores. The jobs proximity index shows some relationship with non-white segregation patterns; however, transportation facilities also play a significant role in this index.
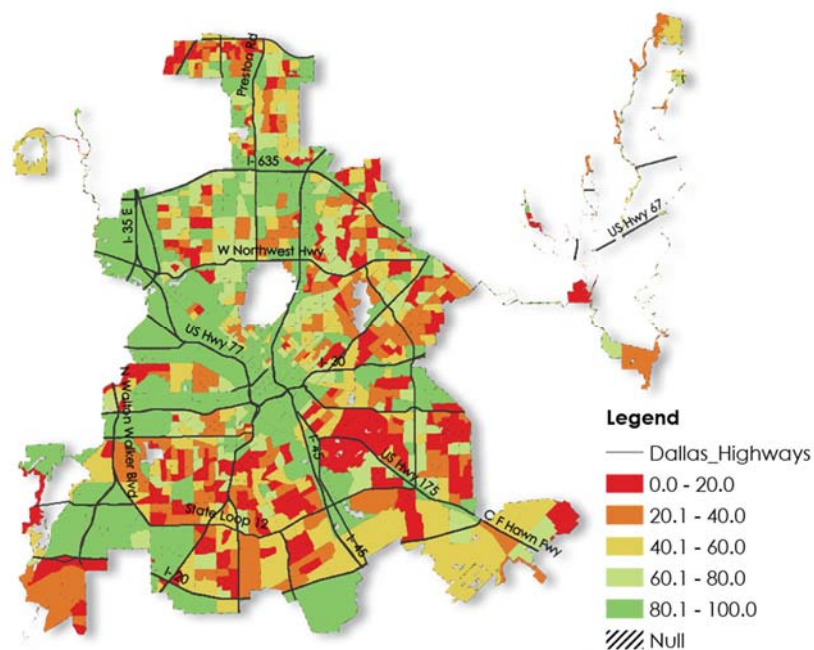
Figure 27: Job proximity index scores by census tract, Dallas

Dallas has an abundance of job opportunities in a fairly diversified economy, and the character of its population is reflected in the major industries of employment. According to the 2017 ACS, the seven top industries provided employment for almost four-fifths of the city's workforce of 641,391 (Table 10). White-collar industries have seemingly become more prominent within Dallas, though construction and manufacturing both maintain a place among the city's most important industries.

Industry	Number	Percentage
Education, Healthcare, and Social Assistance	112,734	17.6%
Professional, Scientific, Waste Management Services	97,377	15.2%
Retail Trade	70,952	11.1%
Arts, Entertainment, and Recreation	67,739	10.6%
Construction	66,666	10.4%
Finance and Insurance; Real Estate/Leasing	56,958	8.9%
Manufacturing	50,262	7.8%

Table 10: Top industries in Dallas

Table 11 lists the major employers within Dallas and the surrounding area based on employees and the North American Industry Classification System (NAICS), with data coming from the Dallas Chamber of Commerce (2018).

10,000+ Employers			
Company	Industry	Company	Industry
American Airlines	Transportation	Medical City	Healthcare
AT&T	Professional Services	Naval Air Station	Government
Baylor Scott & White	Healthcare	Texas Health Resources	Healthcare
HCA North Texas	Healthcare	Texas Instruments	Manufacturing
JP Morgan Chase	Finance, Insurance, and Real Estate	US Postal Service	Government
Kroger	Retail Trade	UT Southwestern	Healthcare
Lockheed Martin	Manufacturing	Walmart Stores	Retail Trade

5,000 Employees to 9,999 Employees	
Children's Medical Center Dallas	Healthcare
Cook Children's Health Care	Healthcare
Dallas County Community College District	Education
DXC Technology	Professional Services
FedEx	Professional Services
Fidelity Investments	Finance, Insurance, and Real Estate
Home Depot	Retail Trade
HP Enterprise Services	Professional Services
JC Penney Company	Retail Trade
L-3 Communications	Manufacturing
Lowe's Companies	Retail Trade
McAfee	Professional Services
Methodist Health System	Healthcare
Parkland Hospital	Healthcare
Raytheon	Manufacturing
Southwest Airlines	Transportation
State Farm Insurance	Finance, Insurance, and Real Estate
Target	Retail Trade
Tom Thumb	Retail Trade
United Parcel Service	Professional Services
UNT System	Education
Verizon Communications	Professional Services

Table 11: Top employers in Dallas

Transportation and Commuting

Public Transit

Dallas Area Rapid Transit (DART) is a regional transit agency authorized under Chapter 452 of the Texas Transportation Code. It was created by voters and funded with a one-cent local sales tax on August 13, 1983. The service area consists of 13 cities: Addison, Carrollton, Cockrell Hill, Dallas, Farmers Branch, Garland, Glenn Heights, Highland Park, Irving, Plano, Richardson, Rowlett, and University Park. A network of DART Rail, Trinity Railway Express (TRE) and bus services moves more than 220,000 passengers per day across a 700-square-mile service area. DART operates both local and express bus routes.

The DART Rail System provides service to work, shopping and entertainment destinations in Dallas, Carrollton, Farmers Branch, Garland, Irving, Plano and Richardson, as well as DFW International Airport. The TRE commuter line links DART to downtown Fort Worth. Free parking is available at most rail stations, and many are served by DART bus routes. Popular shopping and entertainment destinations near DART Rail stations in Dallas include North Park Center and Upper Greenville Avenue (Park Lane Station), West Village (Cityplace/Uptown Station), Mockingbird Station, the Dallas Museum of Art (St. Paul Station), American Airlines Center (Victory Station), West End Historic District (West End Station), Fair Park (Fair Park Station and MLK, Jr. Station), the Dallas Convention Center (Convention Center Station) and the Dallas Zoo (Dallas Zoo Station).

DART has more than 11,000 bus stops throughout Dallas and the surrounding area, and a total of 161 distinct routes as of March 2019. This total includes:

- 29 Local Routes
- 8 Express Routes
- 14 Transit Center Feeder Routes
- 22 Crosstown Routes
- 60 Rail Feeder Routes
- 9 Site Specific Shuttles
- 6 Flex Routes
- 6 DART On-Call Zones
- 6 DART GoLink Zones

Maps of the regional rail system (Figure 28) and most of the DART bus system (Figure 29) provide more information about the system.

Figure 28: DART and regional-rail map
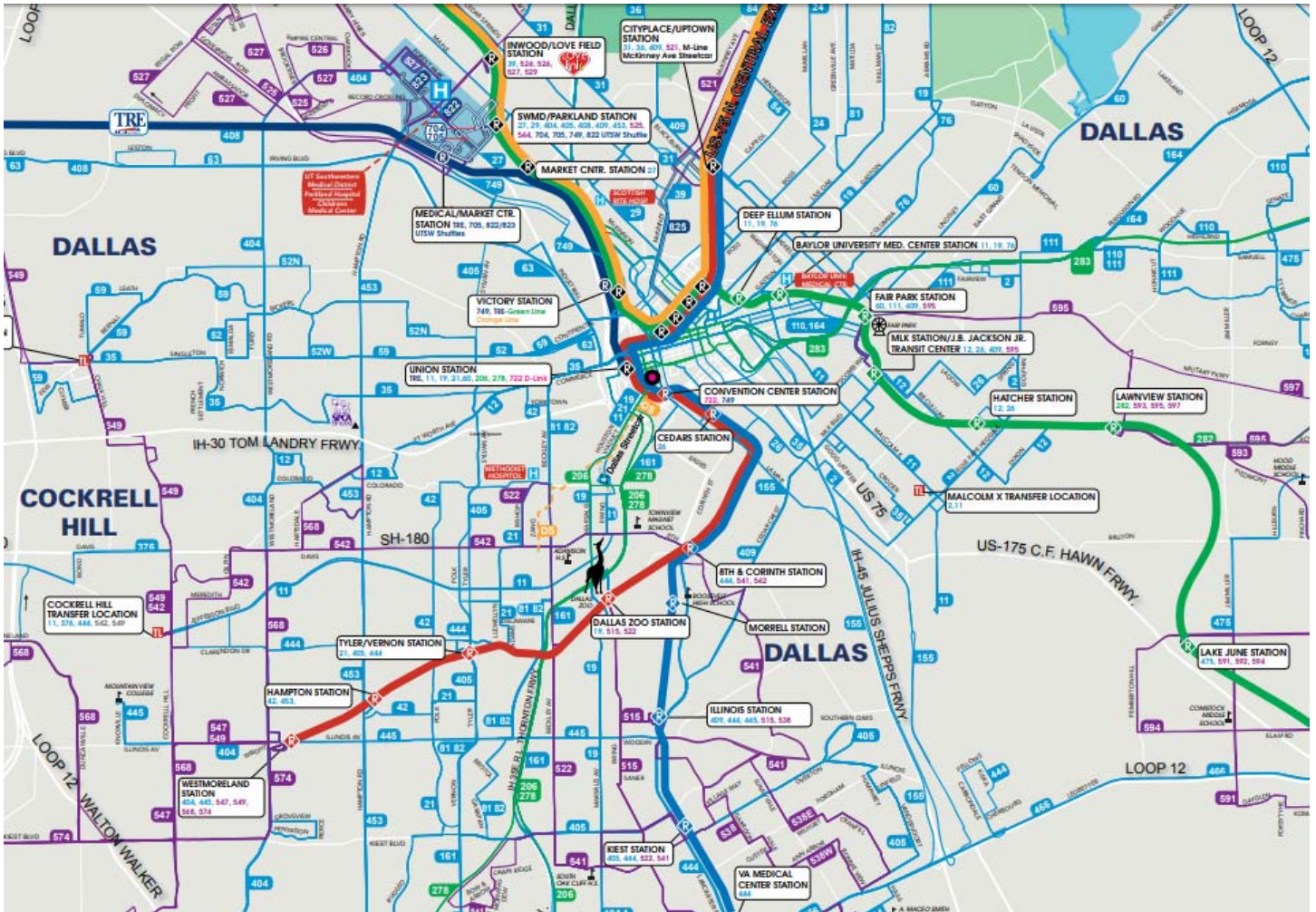
Figure 29: DART bus routes

DART offers four basic local fares, including a:

> $2.50 Single Ride for DART buses

- $3 AM/PM Pass (valid for either morning or night, depending on time of purchase) that covers all bus and rail modes
- $2 Midday Pass valid for all modes between 9:30 a.m. and 2:30 pm.
- $6 Day Pass, good for unlimited rides on the date of purchase through 3 a.m. the following day

Other options include a Regional Day Pass for $12, which covers all DART buses and trains, GoLink and FLEX service, as well as all Trinity Railway Express service, Trinity Metro in Fort Worth, TEXRail, and DCTA in Denton County, including the A-train. Monthly passes for Local and Regional Service, which cost $96 and $192 also exist. The following groups qualify for reduced fares:

- Seniors (65 or older) with valid DART photo ID
- Non-paratransit certified persons with disabilities with valid DART photo ID. (Click here to view medical certificate or state or federal disability identifications required for proof of disability)
- Medicare card holders
- Children ages 5-14 (Children under age 5 may ride free when accompanied by an adult with valid local, regional or reduced fare [up to two children].)
- High school students with a valid DART Service Area high school ID, or a valid DART-issued student ID. High school reduced fare extends to weekends as of August 18, 2018.

- College/Trade School students with valid DART-issued student photo ID for full-time undergraduate students registered at schools which are located in the DART Service Area and are not participating in the Higher Education Program.

DART oversees a free RideShare computerized match list program to put residents in touch with other commuters who want to share the ride. In addition, the DART Vanpool allows 15 passengers to share the cost of riding to work. Vanpool is available anywhere in Dallas, Ellis, Collin, Hunt, Rockwall, Kaufman and Navarro counties. Emergency Ride Home service is provided for vanpoolers who have personal or work related emergencies. Riders are given a ride home via taxi or a rental car, available two times each quarter. The cost of the Emergency Ride Home co-pay is $10.

Certified paratransit-eligible riders may use the bus and rail service free (with valid Paratransit photo ID). Guide dogs and other service animals are permitted on DART vehicles. DART buses offer wheelchair lifts and other features to accommodate riders with disabilities. Seats near the front door are reserved for the elderly and people with disabilities. According to the Americans with Disabilities Act (ADA) standards, wheelchairs must be secured on buses. There are two wheelchair securement locations per bus, each equipped with devices which hold the wheelchairs safely in place. Operators provide securement assistance as needed. Lap/shoulder belts are available upon request. In addition, DART buses offer "stop announcements" provided by automated equipment or bus operators at major intersections and transfer points.

DART Paratransit Service is a curb-to-curb public transportation service for people with disabilities who are unable to use DART buses or trains. Paratransit is a shared-ride service operated with modern, accessible vehicles, and taxi cabs. Riders who are unable to access vans by using steps can use the wheelchair lifts or ramps. On the large accessible vans, boarding chairs are available upon request. DART also offers free travel training, along with travel ambassadors, to persons with disabilities who are capable of riding accessible bus and rail services. Certified Paratransit riders are welcome to schedule trips to begin and end anywhere in the following cities: Addison; Garland; Rowlett; Carrollton; Glenn Heights; Plano; Cockrell Hill; Highland Park; University Park; Dallas; Irving; Farmers Branch; and Richardson. Service is also provided to and from DFW International Airport.

DART buses have bike racks on the front of the bus. DART has updated its fleet of light rail vehicles (LRV) by inserting a new, low floor insert between the existing sections of the vehicle adding seating capacity and improving access through level boarding. The SLRVs allow passengers with bicycles to roll directly onto the trains. DART offers bike racks for short-term parking at most rail stations and transit centers. Bike racks are free of charge and are available on a first-come, first-served basis. DART received a federal grant to replace aged and worn bike lockers with a new environmentally friendly state of the art bike lids. The new bike lids meet homeland security requirements, are homeless and vandal resistant, and do not overheat and melt plastic bike components. Use of the new bike lids will be on a first-come, first-served basis.

In addition to more traditional service, DART also operates or partners to operate both the Dallas Streetcar (Figure 30) and the M-Line. The M-Line is the McKinney Avenue Trolley service. The historic M-Line Trolley offers rides up and down McKinney Avenue, connecting to the west entrance of Cityplace/Uptown Station on the DART Rail system. The M-Line's operates 365 days a year, providing safe, clean, reliable, and convenient public transportation free of charge (except charters) in Dallas' vibrant Uptown Neighborhood. The M-Line is operated by the McKinney Avenue Transit Authority, in partnership with DART. The McKinney Avenue Transit Authority is a 501(c) (3) nonprofit organization. The Dallas Streetcar began service in April of 2015 and is a daily sight on the Oak Cliff landscape. Service begins at 5:30 a.m. and the cars run until midnight, making connections with the final DART Rail trains at Union Station. Trains operate every 20 minutes.

Figure 30: The Dallas Streetcar

North Central Texas Council of Governments

The North Central Texas Council of Governments (NCTCOG) is a voluntary association of local governments, established to assist local governments in planning for common needs, cooperating for mutual benefit, and coordinating for sound regional development. NCTCOG's purpose is to strengthen both the individual and collective power of local governments and to help them recognize regional opportunities, eliminate unnecessary duplication, and make joint decisions. NCTCOG serves a 16-county region of North Central Texas, centered on the two urban centers of Dallas and Fort Worth. NCTCOG has over 230 member governments including 16 counties, numerous cities, school districts, and special districts.

As the Metropolitan Planning Organization for the Dallas-Fort Worth area, NCTCOG is required to maintain a long-range transportation plan that defines a vision for the region's multimodal transportation system. This plan is known as the Metropolitan Transportation Plan (MTP) and its aim is to identify policies, programs, and projects for development that respond to adopted goals and to guide expenditures for state and federal funds over the next twenty-plus years. The Mobility 2045 Plan is a blueprint for the region's 2045 transportation system that aims to respond to the regional mobility goals and guide the expenditure of federal and state transportation funds. The plan makes recommendations for all travel modes through the following:

- Policies to guide transportation infrastructure
- Implementation programs to improve mobility
- Projects to increase efficiency, safety and transportation system capacity

Mobility 2045 was adopted as the current Metropolitan Transportation Plan for North Central Texas by the Regional Transportation Council on June 14, 2018. Mobility 2045 is the product of a comprehensive, cooperative, and continuous planning effort. Providing a variety of transportation options now and into the future is essential to creating a high quality of life in the Dallas-Arlington-Fort Worth area. The following is extracted from the Mobility 2045 Plan:

Goals define the purpose of Mobility 2045 and guide efforts to accommodate the multimodal mobility needs of a growing region. These goals support and advance the development of a transportation system that contributes to the region's mobility, quality of life, system sustainability, and continued project implementation.

Mobility
- Improve the availability of transportation options for people and goods.
- Support travel efficiency measures and system enhancements targeted at congestion reduction and management.
- Ensure all communities are provided access to the regional transportation system and planning process.

Quality of Life
- Preserve and enhance the natural environment, improve air quality, and promote active lifestyles.
- Encourage livable communities which support sustainability and economic vitality.

System Sustainability
- Ensure adequate maintenance and enhance the safety and reliability of the existing transportation system.
- Pursue long-term sustainable revenue sources to address regional transportation system needs.

Implementation
- Provide for timely project planning and implementation.
- Develop cost-effective projects and programs aimed at reducing the costs associated with constructing, operating, and maintaining the regional transportation system. Metropolitan Transportation Plan Development Process Mobility 2045 was developed amid growing concern about increased congestion, more restrictive air quality requirements, and the balance of tax and toll-funded projects.

Mobility 2045 also accounts for additional revenue sources that were identified by the State Legislature in the 2015 Legislative Session and approved by Texas voters in November 2015. To make the most efficient use of available funds, Mobility 2045 recommendations were prioritized to first maximize the existing transportation system, then invest strategically in infrastructure improvements. The principles used to allocate financial resources include:

- Maintain and operate existing facilities
- Improve efficiency of existing facilities
- Reduce single-occupancy trips
- Improve land use-transportation connection
- Increase transit trips
- Increase auto occupancy
- Increase system capacity for autos

(goals extracted from page 4 of the Mobility 2045 Introduction)

According to the Mobility Plan, "Mobility 2045 recommendations are required to be financially constrained, meaning only reasonably expected sources of revenue over the time horizon of the plan can be included. Many transportation funding sources, such as gas tax revenues, have not kept pace with increasing fuel efficiency. This has created a gap between the funding that is available and the funding that is needed for system improvements. In the 2013, 2015, and 2017 State Legislative sessions, legislators took steps to partially address this shortfall by allocating new revenue sources to certain types of transportation projects. This additional revenue addresses some, but not all, of the transportation needs in Texas. Therefore, Mobility 2045 strikes a balance between a range of existing and expected funding sources to achieve financial constraint" (NCTCOG, 2018, p 5). Figure 31 shows projected spending on Mobility 2045.

Mobility 2045 Planning Approach	
Infrastructure Maintenance*	$36.8
Management and Operations	$9.5
Growth, Development, and Land Use Strategies	$3.2
Rail & Bus**	$33.3
HOV/Managed Lanes + Freeways/Tollways and Arterials	$53.6
Total, Actual $, Billions	$136.4

Values may not sum due to independent rounding

*Includes transit system maintenance

**Transit capital expenditures, including those using innovative revenue sources such as public-private partnerships

Figure 31: Projected Mobility 2045 expenditures

Figure 32 shows projected figures for 2045, both with and without efforts to combat congestion. The "no-build" scenario sees the cost of congestion within the DFW area increase nearly four-fold from 2018, growing to $47.9 billion. This, along with the massive loss of time brought about by vehicular congestion, is a major part of the impetus for Mobility 2045. The hope is that a concerted effort to improve all parts of the transportation system can help combat congestion and make transportation easier in and around Dallas.

Regional System Performance	2018	2045	No-Build
Population	7,429,723	11,246,531	11,246,531
Employment	4,793,363	7,024,227	7,024,227
Vehicle Miles of Travel (Daily)	212,232,952	331,495,638	332,500,169
Hourly Capacity (Miles)	44,794,000	54,330,341	44,297,513
Vehicle Hours Spent in Delay (Daily)	1,680,685	3,788,105	6,654,772
Increase in Travel Time Due to Congestion	40.94%	59.32%	101.65%
Annual Cost of Congestion (Billions)	*$12.1*	*$27.3*	*$47.9*

Figure 32: Regional highway system performance, projected for 2045 in "build" and "no-build" scenarios

III.   HOUSING PROFILE

Housing by Tenure

Table 12 describes the demographics of census tracts in Dallas with increasing levels of non-white/white segregation. In 2013, locations with population shares similar to Dallas as a whole and with low levels of segregation appear to have had the greatest proportion of renters. This might be attributed to gentrification in areas near downtown Dallas, as well as the relatively low-density present in much of far-south Dallas. Patterns within Dallas appear quite different to those in the region as a whole, as homeownership was much more segregated at the regional level than in Dallas.

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%

Table 12: Housing tenure and segregation, Dallas

In Dallas, 49% of homeowners were white, 29% Hispanic, 18% were black and 3% were Asian/PI. Renters were far more prominent in Dallas than elsewhere in the DFW region, and well over half of Dallas households rented their domicile. Looking within each racial and ethnic group, 46% of Dallas's white households rented, with 54% owning their home. This is by far the highest level of homeownership among any group in Dallas. Most black households rented (71%), as did 65% of Asian/PI households and 59% of Hispanic households.

Figures 33 and 34 show that many census tracts in north Dallas demonstrated very high ownership rates compared with other portions of the city; however. R/ECAP tracts located in that portion of north Dallas coincided with high rental percentages. The I-35E corridor to the northeast of downtown had very low ownership rates, but many of the segregated census tracts in east, west and south Dallas had moderate to high ownership rates. These locations with moderate to high ownership rates included some R/ECAPs in south Dallas; this indicates long lasting patterns of segregation with relatively high ownership rates in some of Dallas's poorest areas.
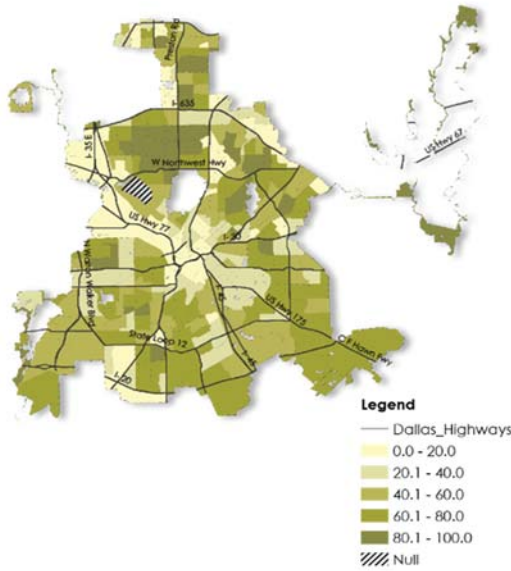
Figure 34: Homeownership patterns, Dallas (2013)
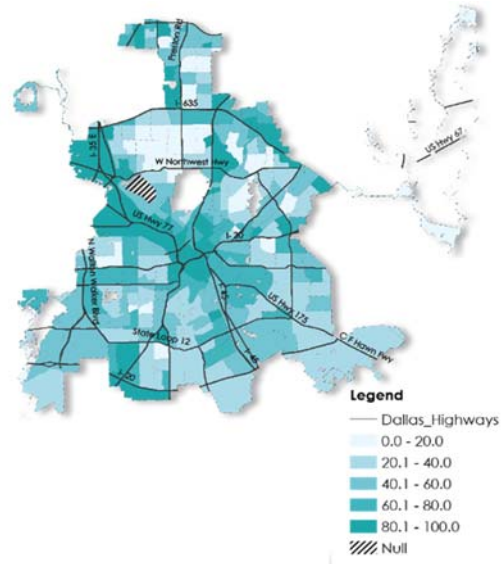
Figure 33: Renters patterns, Dallas (2013)

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 13 shows the number and distribution of owners and renters across income brackets. Lower income households (below 100% HAMFI) tend to rent their housing units, while higher income households (100% HAMFI and above) tend to be homeowners.

Dallas, Texas (2015)						
Income Distribution Overview	Owner	%	Renter	%	Total	%
30% HAMFI or less	22,425	**24%**	72,830	**76%**	95,255	**20%**
30% to 50% HAMFI	25,105	**33%**	50,985	**67%**	76,090	**16%**
50% to 80% HAMFI	33,530	**37%**	56,555	**63%**	90,085	**19%**
80% to 100% HAMFI	18,925	**43%**	25,030	**57%**	43,955	**9%**
100% HAMFI	101,865	**59%**	70,000	**41%**	171,865	**36%**
Total	**201,855**		**275,395**		**477,250**	

Table 13: Housing tenure across income distribution, Dallas

Housing Conditions

The 2017 ACS reports 552,711 total housing units in Dallas and gives a break-out of the types of units in the Dallas housing stock, as well as the year the structures were built (Table 14).

Year Structure Built	Number of Units	Percentage
Built 2010 or later	23,123	4.2%
Built 2000 to 2009	62,627	11.3%
Built 1990 to 1999	55,813	10.1%
Built 1980 to 1989	99,294	18.0%
Built 1970 to 1979	97,854	17.7%
Built 1960 to 1969	76,052	13.8%
Built 1950 to 1959	76,249	13.8%
Built 1940 to 1949	30,840	5.6%
Built 1939 or earlier	30,859	5.6%

Table 14: Year of construction for Dallas housing units

Much of Dallas's housing stock was built before 1980. Units constructed before 1980 accounted for over 56% of the city's total in 2017. According to the ACS, the predominant type of housing in Dallas was the single-unit, detached structure (43.9%), followed by structures with 20 or more units (22.4%), structures with 5 to 9 units (10.2%), and structures with 10 to 19 units (12.7%). There were 497,622 occupied housing units, as opposed to 55,089 vacant units. About seven percent of rental units were vacant, as opposed to just under two percent of single-family units.

Housing Affordability

Average monthly rent in Dallas during 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.

Table 15 shows Fair Market Rents for the Dallas HUD Metro Area, but Small Area Fair Market Rent is utilized inside Dallas. Small Area Fair Market Rents (SAFMRs) are FMRs calculated for ZIP Codes within Metropolitan Areas. Small Area FMRs are used to set Section 8 HCV payment standards in areas designated by HUD.

Final FY 2019 FMRs By Unit Bedrooms					
	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2019 FMR	$836	$989	$1,201	$1,600	$2,080

Table 15: Fair Market Rent for different unit sizes in 2019

By Tenure

Table 16 shows the extent to which households within a given income bracket tend to be cost burdened (spend more than 30% of income for housing) or severe cost burdened (spend more than 50% of income for housing). A substantially greater share of Dallas households at or below 50% HAMFI were cost burdened and severely cost burdened, compared to any other income group. The rates of cost burden and severe cost burden were greater for renters than for owners and the greatest for renters at and below 30 HAMFI. Close to eight out of 10 Dallas's renter families at 30% HAMFI or below were cost burdened. The data from Table 16 indicates lower-income households are significantly more likely to incur some form of cost burden than others.

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 16: Cost burden by HAMFI and tenure

By Race and Ethnicity

Figure 35 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**. Around 42% of Dallas households suffered at least one housing problem while at the regional level almost 35% of households experienced a housing problem. The Hispanic households in Dallas appear disproportionately impacted by housing problems, with 54% of Hispanic households experiencing housing problems, which was greater than the regional value of 49%. Black households in Dallas had the second highest rate at about 48%, and this was greater than the regional rate of 46%. White households in Dallas experienced housing problems at a slightly higher rate (30%) than white households throughout the region (27%). Finally, Asian/PI households and other, non-Hispanic households both experienced 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 experienced housing problems than all other races and ethnicities.
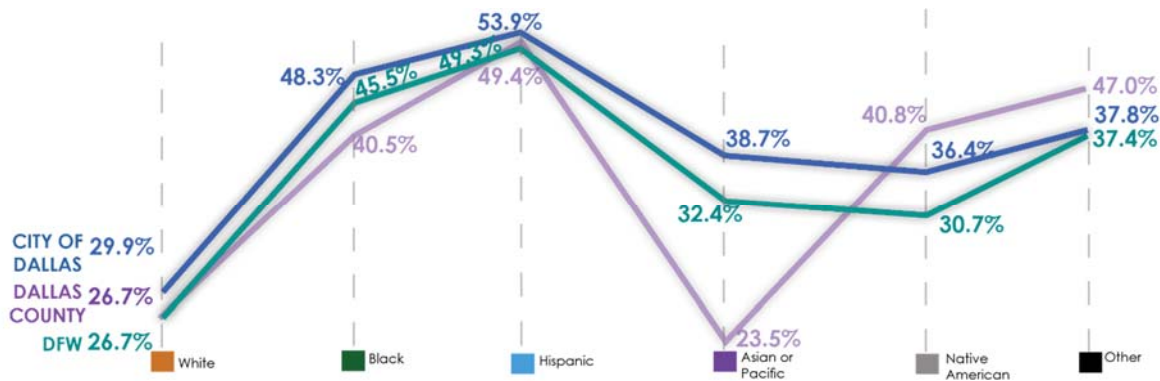
Figure 35: Rates of housing problems by race and ethnicity, City of Dallas, Dallas County, DFW region

As before with housing problems, severe housing problems occurred in 24% of Dallas households while at the regional level over 18% of households experience a severe housing problem. Dallas's white (15%), Hispanic (34%), black (28%), Asian/PI (25%), Native American (19%) and "other" (20%) households experienced severe housing problems more frequently than their overall regional rates (12%, 30%, 24%, 19%, 17%, respectively). Severe housing problems for white households in Dallas happened were significantly rarer than for all other racial and ethnic groups.

By Family Type and Size

In Dallas, non-family households experienced a rate of housing problems comparable to the regional rate of over 40 percent (Figure 36). Both types of family households experienced more housing problems than at the regional level; 67% of Dallas-based family households of five or more faced housing problems while 50% of these households encountered 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. Table 17 provides the total numbers for Dallas by household type.

Figure 36: Rate of housing problems by household type and size

Disproportionate Housing Needs	(Dallas, TX CDBG, HOME, ESG) Jurisdiction		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Household Type and Size			
Family households, <5 people	78,435	212,860	36.85%
Family households, 5+ people	35,730	53,435	66.87%
Non-family households	81,465	195,705	41.63%

Table 17: Disproportionate housing needs by race/ethnicity and household size and type, Dallas and DFW region

By Location

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 had fewer housing problems the rest of the city (Figure 37); this pattern matched the general white/non-white 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 experienced 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 were located in north Dallas, where the access to opportunities remains high. Many areas observed over 60% of the Hispanic households incurring housing problems. Among tracts with available data for Asian/PI households, several reported over 80% experiencing housing problems in 2013, including in a few census tracts within central and north Dallas. Still, many other census tracts in the same areas showed less than 20% of Asian/PI households experiencing housing problems. As a whole, housing problems tended to match closely with the spatial distribution of the low poverty index and non-white segregation.
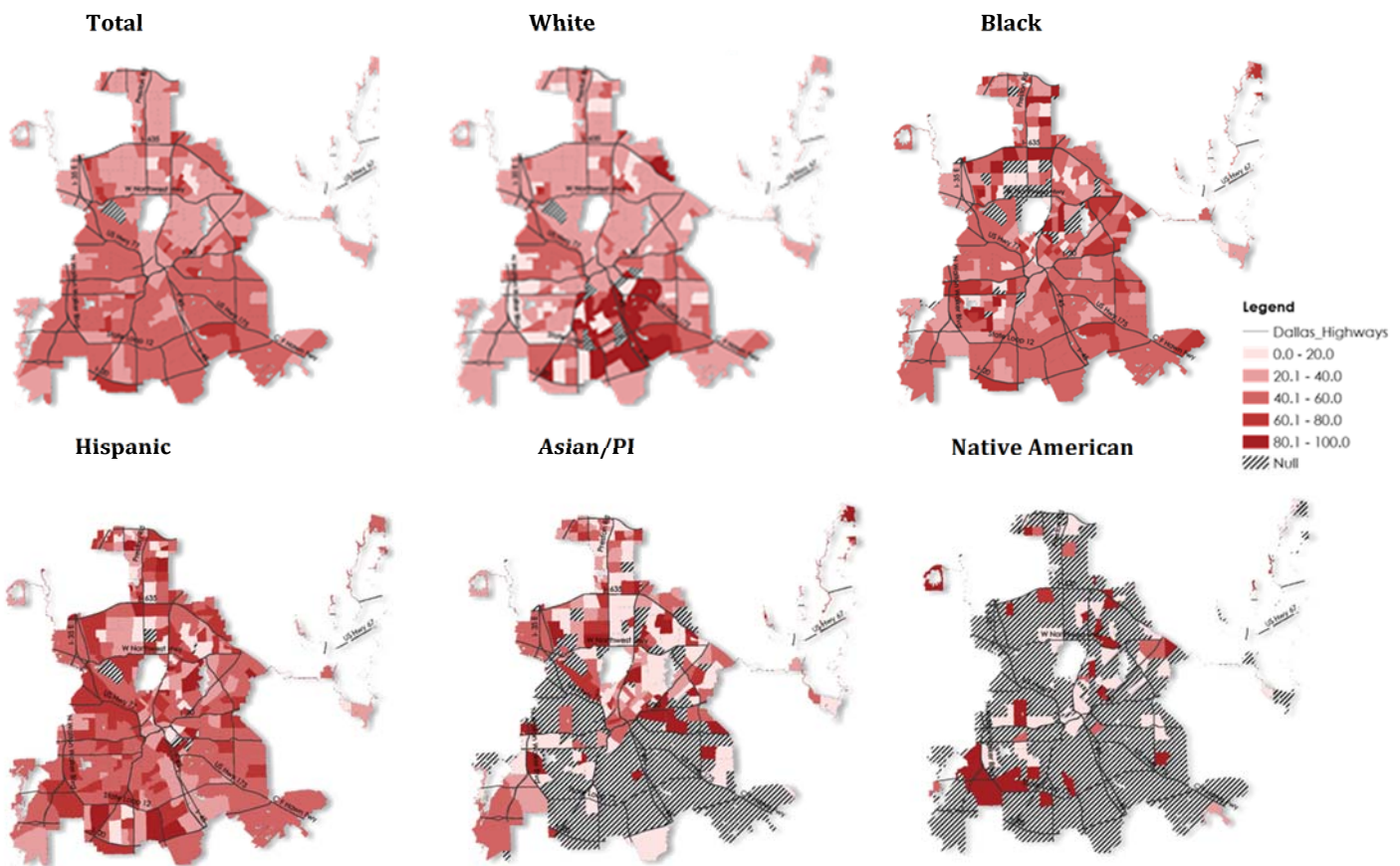
Figure 37: Housing problems by race/ethnicity: spatial patterns, Dallas

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Figure 38 depicts the percentage of rental units considered affordable in each Dallas census tract. An affordable rental unit is defined in the Comprehensive Housing Affordability Survey as one renting at or less than 30 percent of household income for a household whose income is at 50 percent of area median income. Inside Dallas, most tracts with a high percentage of affordable units appear in south Dallas; however, areas with relatively high percentages of affordable rental units also appear throughout the city. Figure 39 shows the number of affordable rental units by tract. Affordable units appear most abundant in and around downtown Dallas because these tracts have a large number of total units available. Other areas with relatively large quantities of affordable rental units appear in the I-35E corridor north of downtown Dallas, along I-635 in north Dallas and in portions of far-south Dallas near Duncanville.
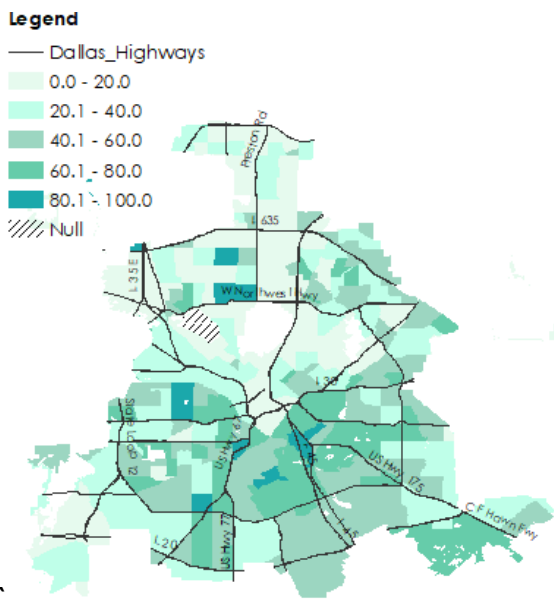
Figure 38: Percentage of affordable rental units
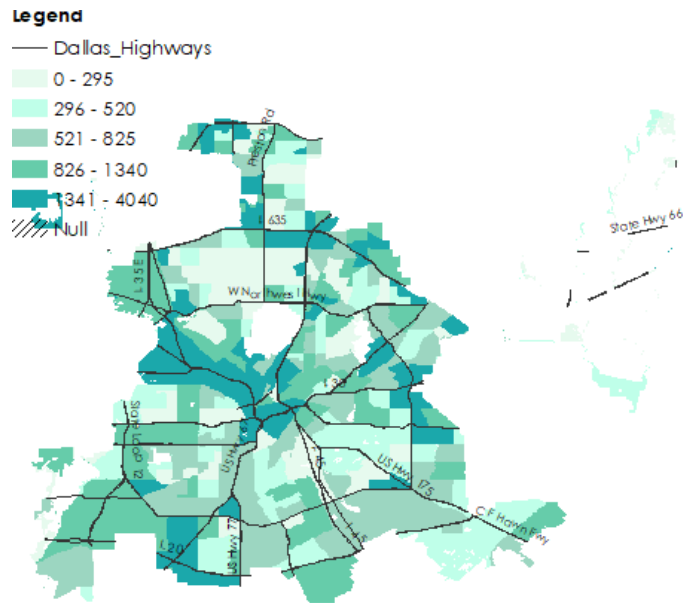
Figure 39: Number of affordable rental units

Table 18 displays 2016 income data in Dallas (U.S. Census Bureau, 2016). In 2016, 20% of Dallas households (97,756) received Social Security (SS) benefits. The average income received from SS 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.

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

Table 18: Income assistance and affordable monthly housing in Dallas

Market Analysis

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.

Figures 40 – 43 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.
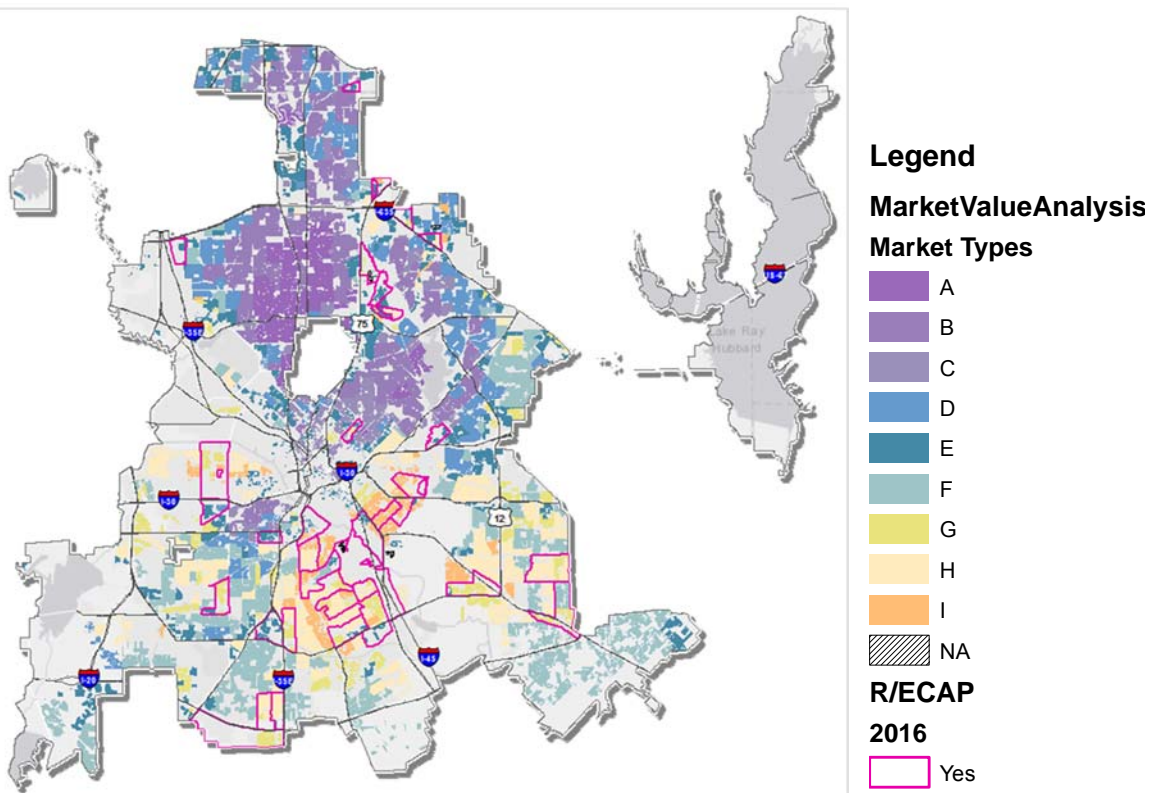
Figure 40: Dallas Market Value Analysis results and R/ECAP overlap
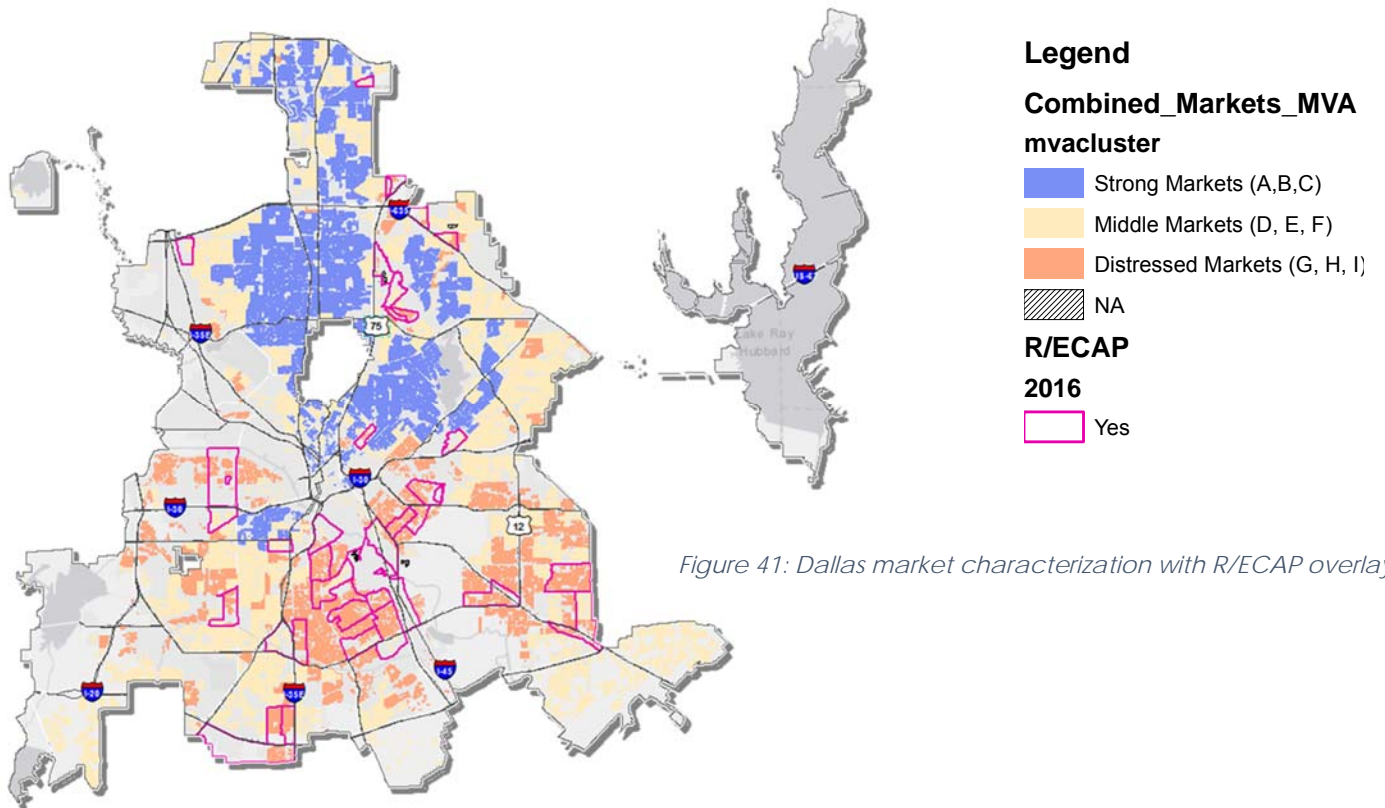
Figure 41: Dallas market characterization with R/ECAP overlay
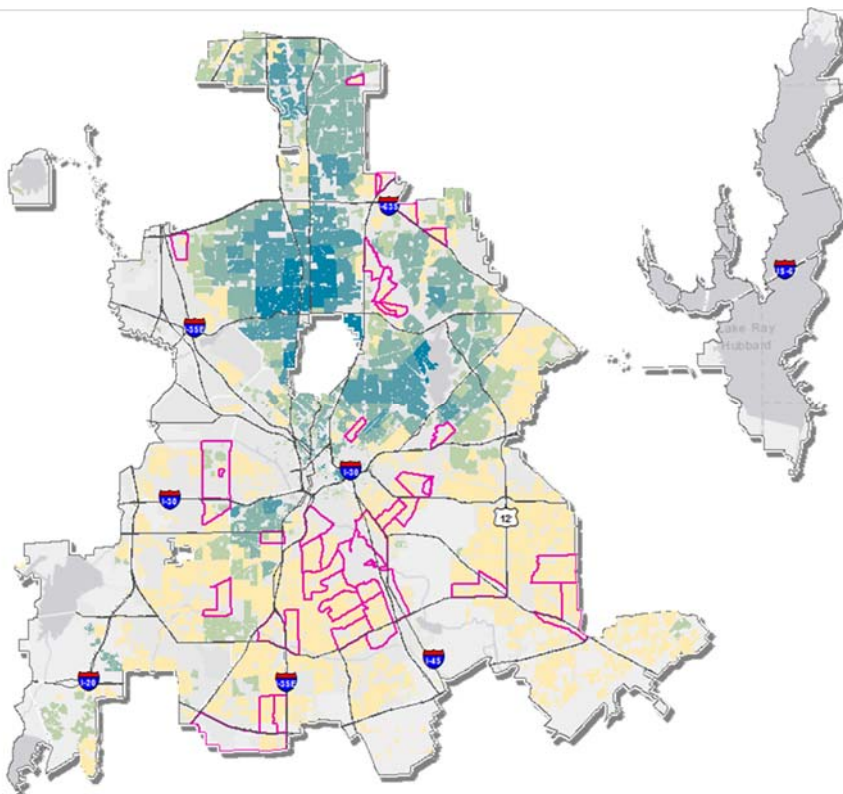
Figure 42: Median sales prices in Dallas

The MVA shows most R/ECAP areas could be characterized as distressed. The median home sales price was significantly lower in R/ECAPs than elsewhere; however, R/ECAP pricing generally reflected the overall pattern for south Dallas. Similarly, R/ECAPs in north Oak cliff, east Oak Cliff, Fair Park and south Dallas include higher rates of homes with code violation liens. In sum, a typical R/ECAP census tract in Dallas was not only characterized by the vulnerability of its residents (racial/ethnic and poverty concentration), but also by a relative acute weakness and high distress level in its real estate market.

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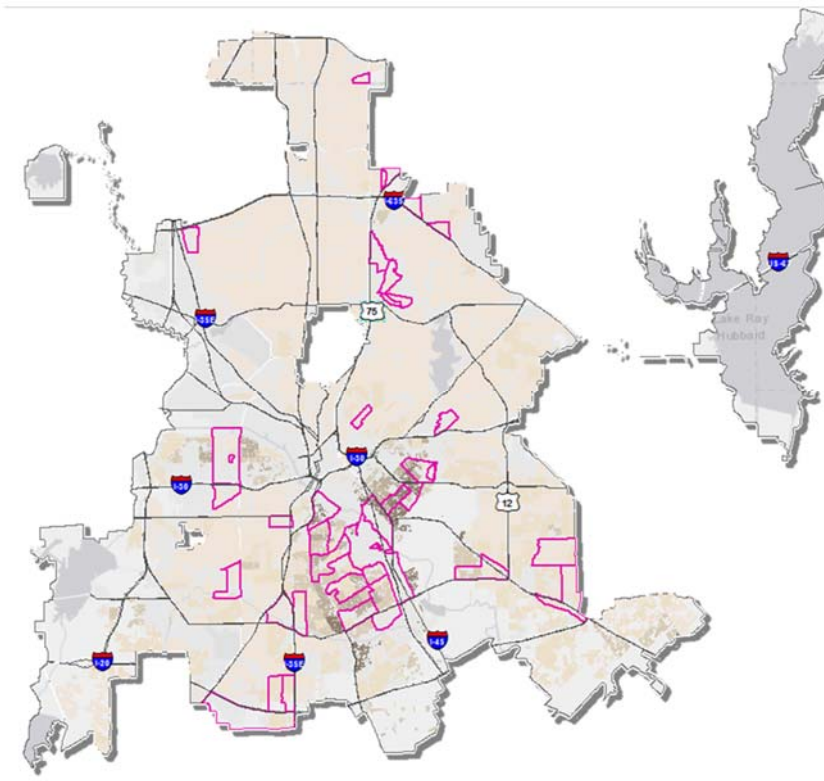
Figure 43: Percent with code violations

Legend

R/ECAP
2016

Yes

No

-

+

Legend

Reinvestment Areas

Emerging Market Area

Redevelopment Area

Stabilization Areas

R/ECAP
2016

Yes
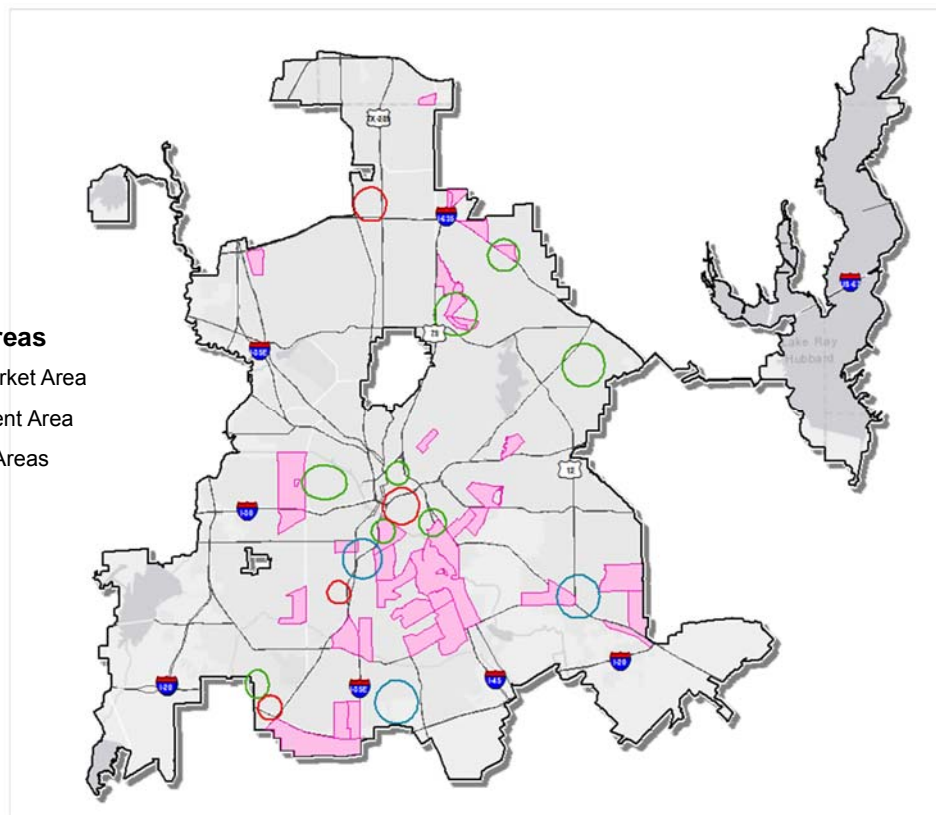
Figure 44: Reinvestment areas depicted with differently colored circles

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. The City housing policy targeted areas 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.

Housing Stock Available to Persons with Disabilities

To determine if sufficient housing available for disabled persons exists, the analysis first determines the number of persons in the city considered disabled. HUD defines a disabled person as "any person who has a physical or mental impairment that substantially limits one or more major life events (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment". The City of Dallas adopted this federal definition of disability in its City Code.

The most recent data comprehensive data on disability status among Dallas' population comes from the 2017 ACS. According to the 2017 ACS, 9.6% (123,845 persons) of Dallas' civilian non-institutionalized population report a disability. Table 19 includes the breakdown of the disabled population by age group. Individuals 75 and older were most likely to be disabled, and the 35-to-64 category had the largest number of disabled persons.

Age	Disabled Population	Percent of Age Group
Under 5 years	877	.9%
5 to 17 years	9,336	4.1%
18 to 34 years	15,494	4.2%
35 to 64 years	53,177	11.4%
65 to 74 years	20,179	27.1%
75 and over years	24,782	49.1%

Table 19: Disabled population by age group

The 2017 ACS also provides information regarding the type of disabilities within the Dallas population. Persons with ambulatory disabilities are the most common in the city, while the least common disability reported among Dallas residents is self-care difficulty (Table 20).

Disability Type	Disabled Population	Percent of Population
Hearing Difficulty	30,015	2.3%
Vision Difficulty	28,832	2.2%
Cognitive Difficulty	47,779	4.0%
Ambulatory Difficulty	66,224	5.6%
Self-Care Difficulty	28,128	2.4%
Independent Living Difficulty	44,554	4.6%

Table 20: Disabled population by disability

No more than 10% of individuals between 5 and 17 years old in any Dallas census tract were considered disabled (Figure 45). Many census tracts in west Dallas, downtown, south Dallas and southeast Oak Cliff had rates of disability between 10.1% and 20% for working-age adults (ages 18 to 64) Many of these neighborhoods coincide with R/ECAPs and minority concentrations. Census tracts with rates of disability between 10.1% and 20% for residents age 64 or over appear infrequently throughout north Dallas, south Dallas and southeast Oak Cliff. One census tract in northwest Dallas had between a 20.1% and 30.2% disability rate among individuals 64 or over. This area includes several senior housing developments, including those for persons needing memory care, which accounts for the higher concentration.

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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

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— Dallas_Highways

- 0.0 - 10.0
- 10.1 - 20.0
- 20.1 - 30.2
- Null
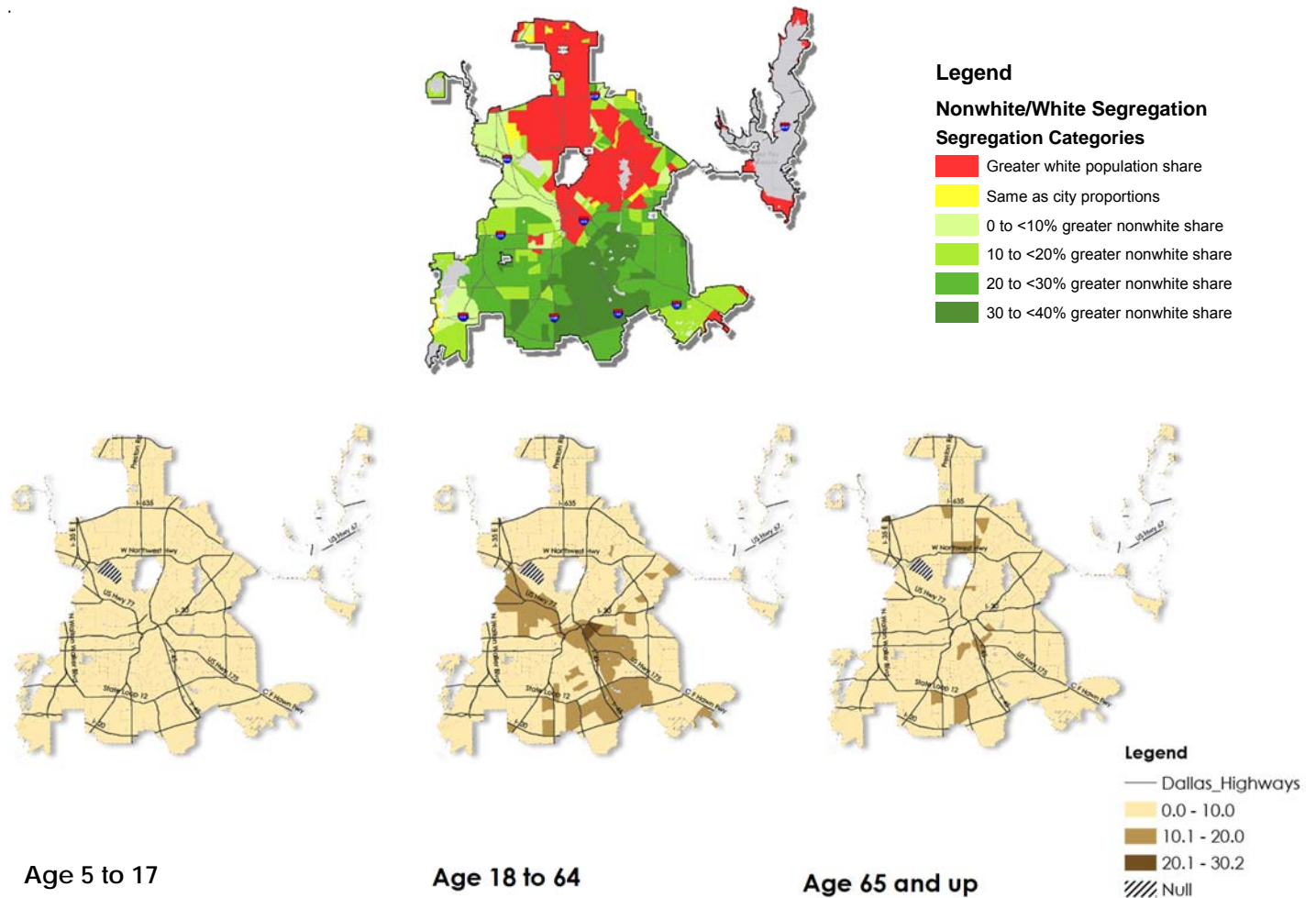
Figure 45: Comparing disability and segregation in Dallas

Figure 46 displays the rates of different types of disabilities in Dallas's general population. 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 had higher rates of persons with ambulatory disabilities, cognitive disabilities and difficulties with independent living.
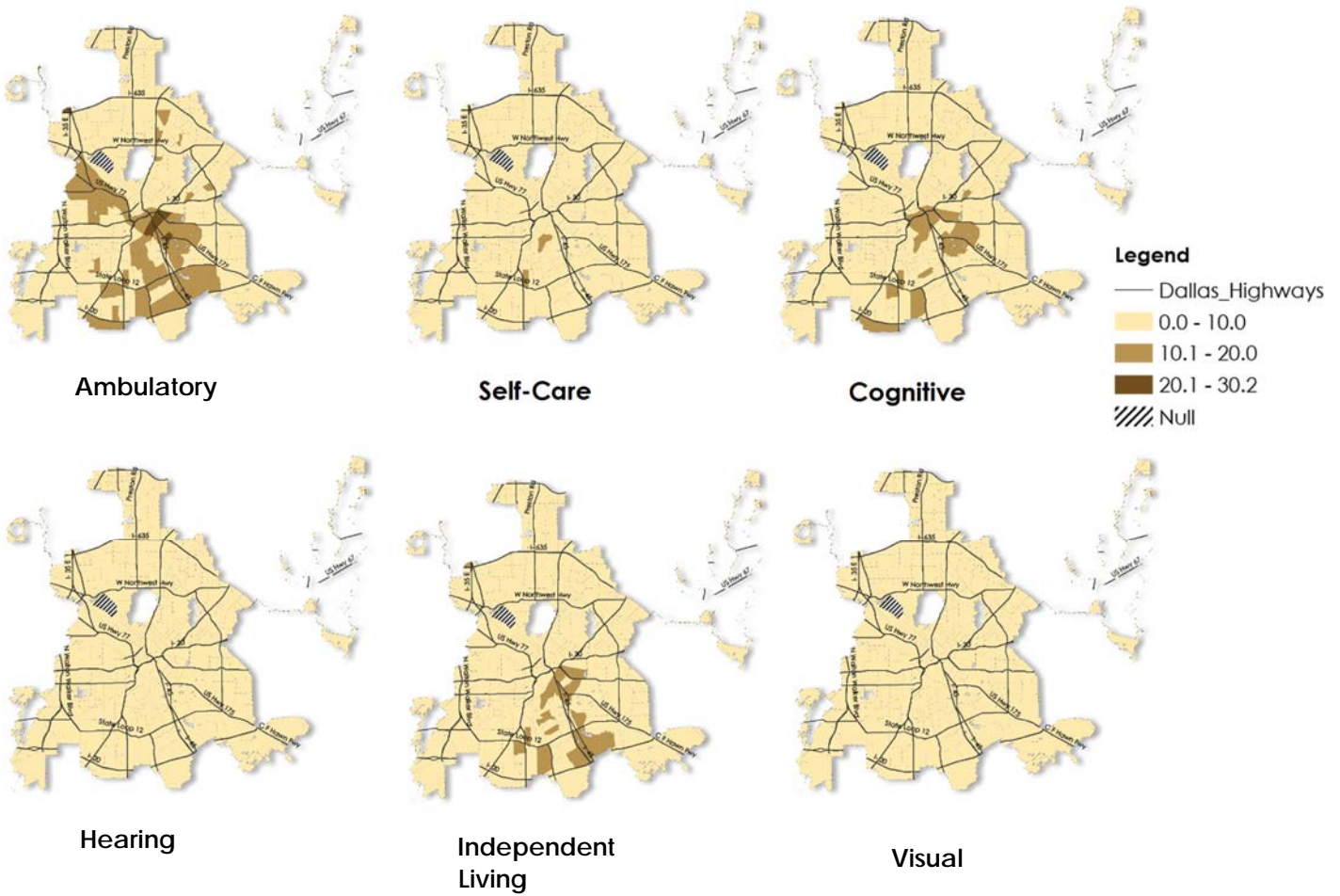
Figure 46: Individuals with a disability by type: spatial patterns, Dallas

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 21 lists assisted living properties in Dallas. In all, NCTCOG lists over 7,400 assisted living units across 120 facilities inside Dallas. Assisted living housing units in the DFW region cost an average of $3,129 per month and seem unaffordable to low-income seniors living in publicly supported housing with average annual incomes of $10,000 (Hubanks, 2017; Caring, Inc., 2018). The availability and affordability of assisted living falls far short of the over 64,000 residents with self-care difficulties (U.S. Census Bureau, 2016).

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

Table 21: Assisted living properties in the City of Dallas with number of units

Far fewer options exist for individuals with intellectual disabilities who might need dedicated care. Table 22 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.

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

Table 22: Intermediate care facilities in the City of Dallas with number of units

The City of Dallas's 2017-18 Consolidated Annual Performance and Evaluation Report notes that, "In May 2018, the City Council adopted a Comprehensive Housing Policy that addresses citywide housing issues systematically and strategically. The policy has these goals:

• Create and maintain available and affordable housing throughout Dallas.
• Promote greater fair housing choices.
• Overcome patterns of segregation and concentration of poverty through incentives and requirements.

To inform the policy, the City first developed the Dallas Market Value Analysis (MVA) – an analytical tool used to assess the residential real estate market throughout the city to determine with granular detail where market strength, transition, and stress exist.

Both serve to provide the City with data through the analysis of housing-related challenges and other factors contributing to, in whole or part, disparities in access to affordable/accessible housing, employment opportunities, [and] transportation. Each also completes an analysis of the real estate market to support impactful data-based community investment. Through data analysis from each initiative, in combination with public/stakeholder meetings, households of the worst-case housing needs and those of persons/households with disabilities can be more easily identified and remediation incorporated utilizing federal resources and/or to leverage existing community resources and programs. These initiatives provide the City with data to make strategic, data driven decisions that impact all its citizens, most particularly those most vulnerable, while building on the sustainability in stronger, more stable segments of the City" (p 32).

"The City has established guidelines in relation to Universal Design. In addition, the City wants to ensure that newly constructed units are compatible with existing neighborhoods. This comprehensive housing policy creates a Universal Design construction requirement for all new single-family homes, duplexes, and triplexes using financial assistance from the City.

The goal of "Universal Design" is to ensure that housing can accommodate the needs of people with a wide range of abilities, including children, aging populations and persons with disabilities. Consequently, all new construction housing projects using City of Dallas CDBG and/or HOME funds will meet all the following criteria:

• At least one entrance shall have 36-inch door and be on an accessible route.
• All interior doors shall be no less than 32-inches wide; except for a door that provides access to a closet of fewer than 15 square feet in area. Each hallway shall have a width of at least 36-inches wide and shall be level and ramped or beveled changes at each door threshold.
• All bathrooms shall have the wall reinforced around the toilet, bathtub and shower; for future installation of grab bars.
• Each electrical panel, light switch or thermostat shall be mounted no higher than 48 inches above the floor. Each electrical plug or other receptacle shall be at least 15 inches from the finished floor.
• An electric panel located outside the dwelling unit must be between 18 inches and 42 inches above the ground served by an accessible route
• All hardwire installed to open/close doors and operate plumbing fixtures shall be lever handles" (pp 48-49).

The City has undertaken several actions in recent years to address the need for housing for the disabled. A review of the City of Dallas' FY 2018-2019Action Plan revealed that the city worked with the following agencies and organizations providing services to persons with disabilities:

- Texas Department of Aging and Disability Services
- Texas Department of Assistive and Rehabilitative Services
- Texas Department of Housing and Community Affairs
- Local Homeless Continuum of Care
- U.S. Department of Health and Human Services
- Substance Abuse and Mental Health Services Administration
- Texas Department of State Health Services
- CitySquare
- PWA Coalition of Dallas, Inc.
- Legacy Counseling Center, Inc.
- Shelter Ministries of Dallas
- Legal Aid of Northwest Texas
- Dallas MetroCare Services
- The Bridge
- VA North Texas Health Care System
- Nexus Recovery Center
- Salvation Army
- The Senior Source
- Health Services of North Texas
- The Wilkinson Center
- City of Dallas Office of Community Care
- Transicare
- Association of Persons Affected by Addiction
- Child and Family Guidance Center

One of the major partners of the City is the Dallas Housing Authority (DHA). A review of DHA's 2019 Public Housing Authority Plan shows that well over 7,000 disabled households were on the waiting list for public housing. Over 4,000 disabled households were on the waiting list for Section 8 Housing. This seems to point toward a need to increase the available housing stock for Dallas's persons with disabilities.

Subsidized Multi-family Affordable Housing Stock

Introduction

One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multi-family housing developments for a variety of income groups and ages such as the elderly. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, concerns about racial and ethnic concentrations of housing must be considered. The following are some of the multi-family housing types that meet the needs of low income, elderly and persons with disabilities in Dallas:

- Low income housing tax credits (LIHTC) – The LIHTC program administered by the Texas Department of Housing and Community Affairs (TDHCA) and provides for the development costs of low-income housing by giving a federal tax credit to investors for investing in housing for low-income households typically at 60% of the Area Median Income (AMI) and below. However, due to the rent levels, renters at 30% AMI may not be able to afford the units.

- Section 202 Supportive Housing for the Elderly – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for very low-income elderly persons.

- Section 811 Supportive Housing for Persons with Disabilities – A HUD-funded program that provides interest-free capital advances to private, non-profit sponsors to fund the development and operating costs of affordable housing with support services for persons with disabilities. The program also provides rental assistance to state housing agencies for new and existing multi-family housing developments.

- Section 8 Loan Management Set-Aside (LMSA) Program – A HUD-funded program that provides financial assistance in the form of rental subsidies to multi-family properties subject to Federal Home Administration (FHA) insured mortgage loans which are in immediate or potential financing difficulty; and thereby to reduce the volume of mortgage loan defaults as well as claims for FHA mortgage insurance benefits from private lenders holding the FHA insured mortgage loans and such projects.[7]

- Public Housing – A HUD-funded program that provides financial assistance to local housing agencies (HAs or PHAs) to develop and operate decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. The public housing program in Dallas is administered by the Dallas Housing Authority. Public Housing is a program funded by the U.S. Department of Housing and Urban Development (HUD) for low-income residents. Annual gross income must be within limits established by HUD, and eligible families pay a monthly rent equal to the greater between 30% of monthly adjusted income or 10% of unadjusted monthly income. Applicants may qualify as a family and/or as an eligible single person. DHA owns and manages all rental units offered under this program. According to the agency's 2019 PHA Annual Plan, DHA owns 3,527 public housing units. Under the Conventional Housing Program, DHA offers Mixed Population Housing where individuals over the age of 62 and disabled adults reside together and are able to participate in a variety of group activities that allow them to socialize. Other programs include the Family Self-Sufficiency Program, designed to assist families in becoming economically independent and self-sufficient, and resident services which include home study centers, and Resident Employment & Training (RET). As of May 2019, the average household income for public housing residents was $13,270. The average rent paid in DHA's public housing units was $221.

[7] U.S. Department of Housing and Urban Development (HUD) website. Section 8 Program Background Information. http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/rfp/s8bkinfo

- Section 8 Housing Choice Voucher Program – A HUD-funded program that provides financial assistance for the rental of housing from private landlords for eligible low-income families, the elderly, and persons with disabilities. Tenants may find their own housing including single–family homes, townhouses, and apartments. The section 8 voucher program in Dallas is administered by DHA. The HCV Program (formerly known as Section 8) is a federal program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Eligibility for a housing voucher is determined by the PHA based on the total annual gross income and family. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live.

As it relates to the fair housing, one of the goals of the DHA is to ensure equal housing opportunity and to affirmatively further fair housing. To achieve this goal, the agency will undertake:

- Affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familiar status, and disability;
- Affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability;
- Affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required;
- Reserve up to 20% of the Section 8 Housing Choice Vouchers for Project- Based assistance which will provide housing for families with special needs; and
- Comply with the Violence against Women and Justice Department Reauthorization Action of 2005 (VAWA).

According to the 2019 PHA Plan, DHA conducts affirmative marketing of the programs to ensure that the waiting list includes a mix of applicants in term of race, ethnicity, age, and disability.

To meet the housing needs of families of races and ethnicities with disproportionate housing needs, the DHA plans to: increase awareness of PHA resources by affirmatively marketing to races or ethnicities shown to have disproportionate housing needs; conduct activities to affirmatively further fair housing such as informing Section 8 tenants of the location of units outside areas of poverty or minority concentration as well as marketing the program to landlords outside of areas of poverty or minority concentration.

DHA has a policy to respond to all complaints received from applicants and tenants who believe they may have been discriminated against. The agency maintains records of all complaints, investigations, and final decisions. Applicants are also advised of their right to file a complaint with the HUD Fair Housing and Equal Opportunity Office and the process to do so.

The mission of the DHA is to provide quality, affordable housing to low-income families and individuals through the effective and efficient administration of housing assistance programs; and by creating and cultivating opportunities for program participants to achieve self-sufficiency and economic independence. The DHA was created in 1938 by the Dallas City Council after being authorized by the Legislature of Texas under the Housing Authorities Law of 1937. The goals of the agency include:

- Increasing the availability of decent, safe, and affordable housing
- Improving community quality of life and economic viability
- Promoting self-sufficient and asset development of families and individuals
- Ensuring equal opportunity in housing for all Americans; and
- Promoting resident employment and business opportunities

DHA provides housing opportunities to roughly 55,000 people in total. As of May 2019, 86% of households assisted by DHA identified as African American. Seniors and persons with disabilities combined to compose about 46% of DHA clients. According to the agency's 2019 PHA Plan, there were 22,426 individuals on the public housing waiting list and 16,775 on the HCV waiting list. Currently, DHA offers clients a wide range of housing choices and support services designed to move clients towards self-sufficiency.

Since its creation, DHA has experienced several challenging periods in its history. As a result of problems highlighted in an audit of the agency, the DHA was completely reorganized in 1979. Another major milestone in its history is the 1985 case that has come to be known as the Walker Settlement. A lawsuit brought against the City of Dallas, HUD, and the DHA by seven African American women alleged that public housing units were built in the minority areas within the city and that tenant selection procedures encourages racial segregation. DHA entered into a Consent Decree as a result of this lawsuit.

Program Participation by Race/Ethnicity

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 23 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 households. Furthermore, Dallas accounts for 48% of households residing in publicly supported housing units within the DFW region. Overall, black households represent the largest group (17,169 households) living in publicly supported housing, followed by white (1,482), Hispanic (1,446), and Asian/PI (414) households. Black households represented a majority in all programs.

In the region, an estimated 42,522 households reside in publicly supported housing units, which represents almost 2% of the region's total household population. 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.

(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%

Table 23: Housing type and race/ethnicity, Dallas and Region

The racial/ethnic groups' representation within each housing program differs substantially between the city and region. For the Project-Based Section 8 program, the Dallas share of black households (67%) exceeded the regional proportion (49%). The share of Hispanic households residing in Project-Based Section 8 units in the region (17%) exceeded their share in Dallas (13%). The share of Asian/PI households in Project-Based Section 8 units in Dallas (4%) remained 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 account for a lower proportion in Dallas (7%) compared with the region (4%). The portion of Hispanic households in Public Housing seems comparable between Dallas and the region (10% for each), while Asian/PI households only represented 3% of the total in the region and 0.3% in Dallas. The HCV program in Dallas serves black households (88%) at a rate greater than the overall DFW region (81%).

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 24 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 program participants. 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.

Race/Ethnicity								
(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%
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%

Table 24: Racial/ethnic composition and participation rate by housing program, Dallas

Locating Sections 811 and 202 Supportive Housing

As depicted in Figure 47, nine out of the 11 supportive housing developments are located in census tracts with a non-white population share 20% to 40% greater than the city average (darkest shades of green). 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 the 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.
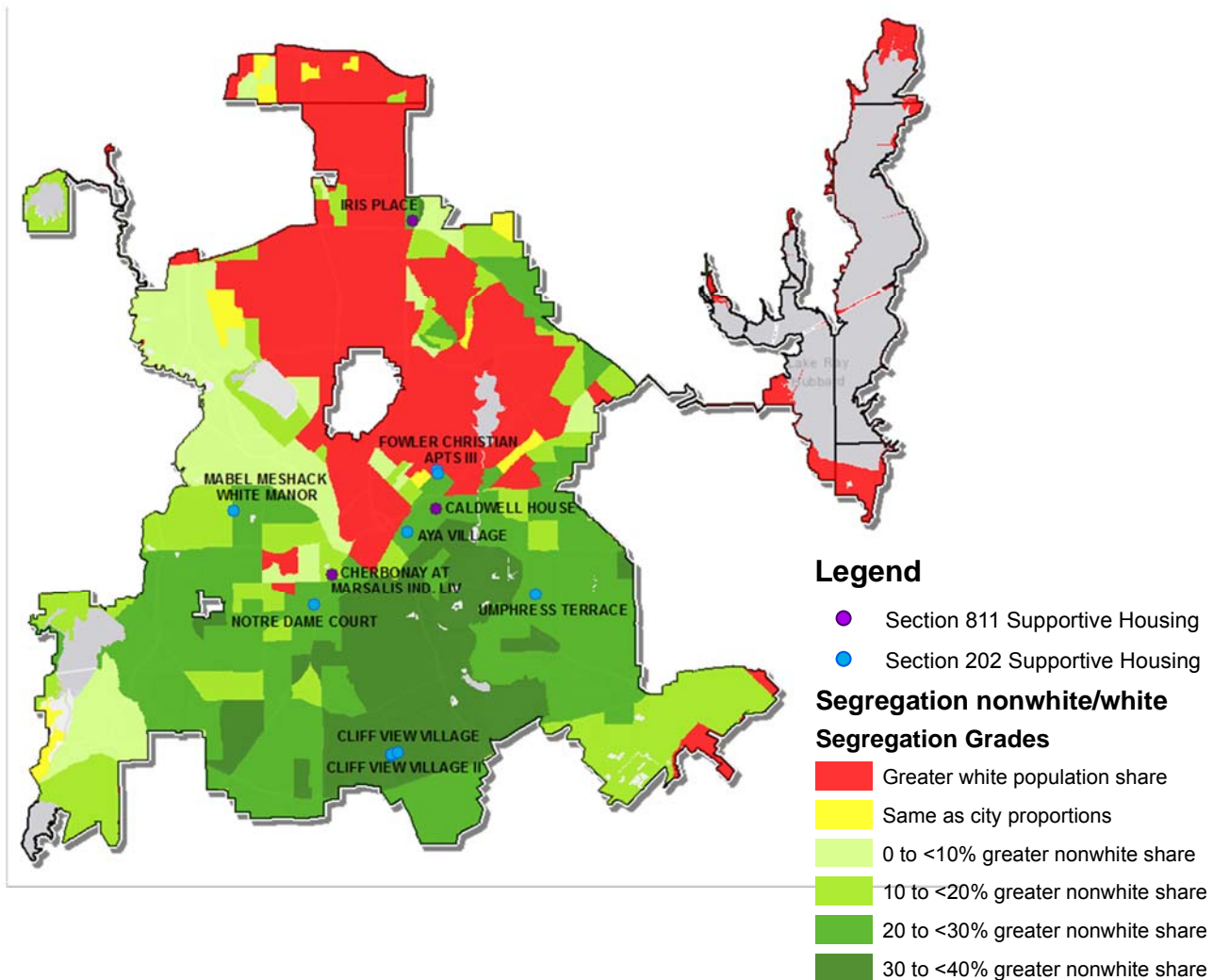
Figure 47: Sections 202 and 811 supportive housing and patterns of segregation, Dallas

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 in a R/ECAP designated census tract (Figure 48). While all other properties are located outside of R/ECAP-designated census tracts, the poverty rate exceeds 20% in the census tracts shared by eight out of the 11 supportive housing developments (Table 25).

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.
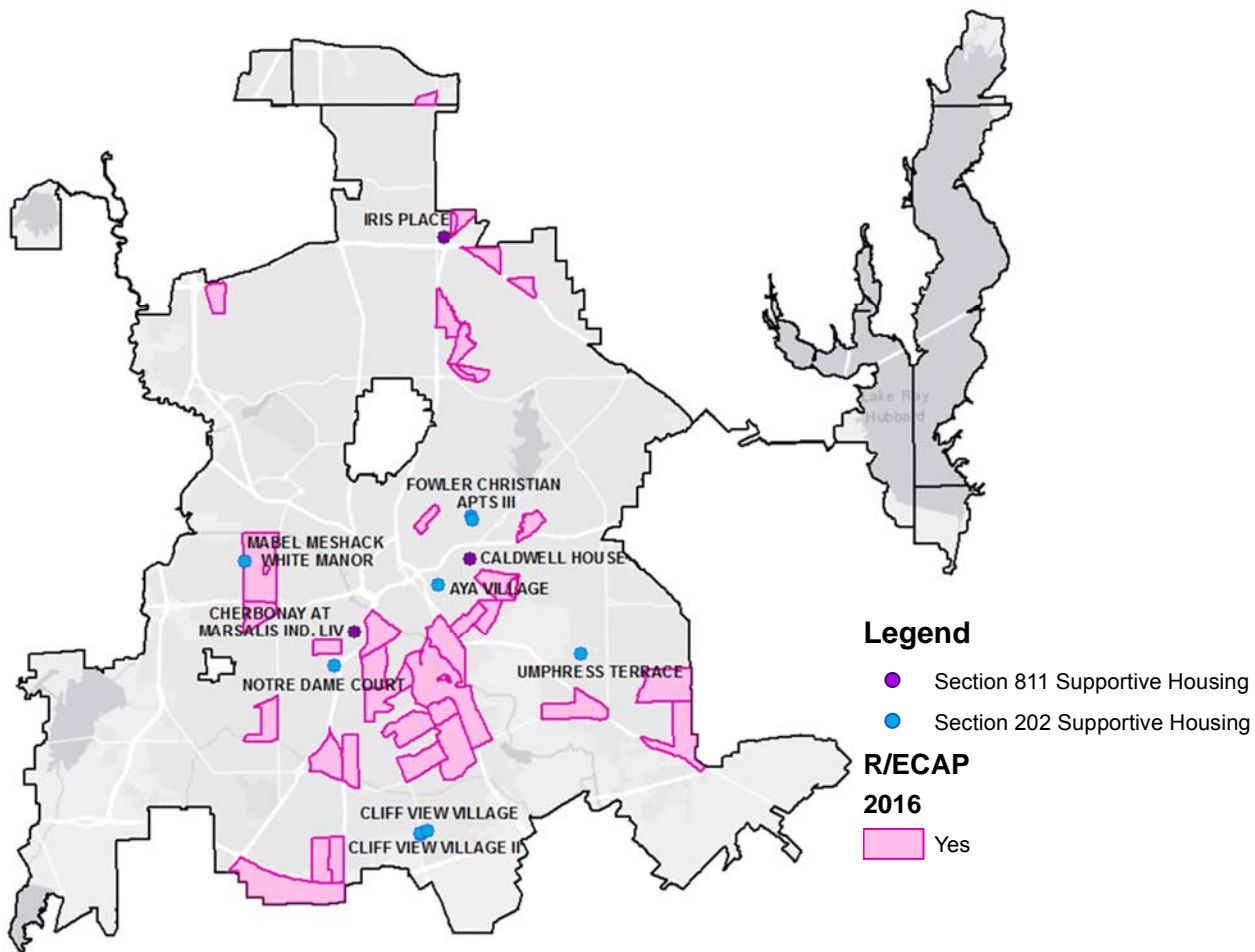

Figure 48: Sections 202 and 811 supportive housing and R/ECAPs, Dallas

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			

Table 25: Sections 202 and 811 supportive housing, percent nonwhite, poverty rate and segregation grade

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: **1**

Locating Housing Choice Voucher Holders

Housing Choice Voucher (HCV) families tend to be disproportionately members of protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. Because of this, 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 in the North Texas Regional Housing Assessment provided local data regarding the residential patterns of HCV families. The research team geolocated 27,743 HCV families across the North Texas region. Dallas was home to 10,531 of those HCV families (Figure 49).

HCV families tend to disproportionately reside in Dallas' most segregated neighborhoods (darkest green shades) and close to seven out of 10 families (69%) live in a neighborhood of the highest segregation grades (5 or 6 = nonwhite population share between 20 and 40% greater than the overall city).

As of 2016, Dallas included 36 R/ECAPs (almost 10%) out of 380 total census tracts. An estimated 28% of the HCV families (n=3,000) residing in Dallas lived in these R/ECAPs. The number of HCV families in a R/ECAP ranged from one to 286, with an average of 83 HCV families in R/ECAP census tracts. The average number of HCV families in non-R/ECAP HCV-populated census tracts only reached 22, or 39 in only non-R/ECAPs with at least one HCV family. The concentration of HCV families seemed disproportionately greater in R/ECAP as opposed to non-R/ECAP census tracts.
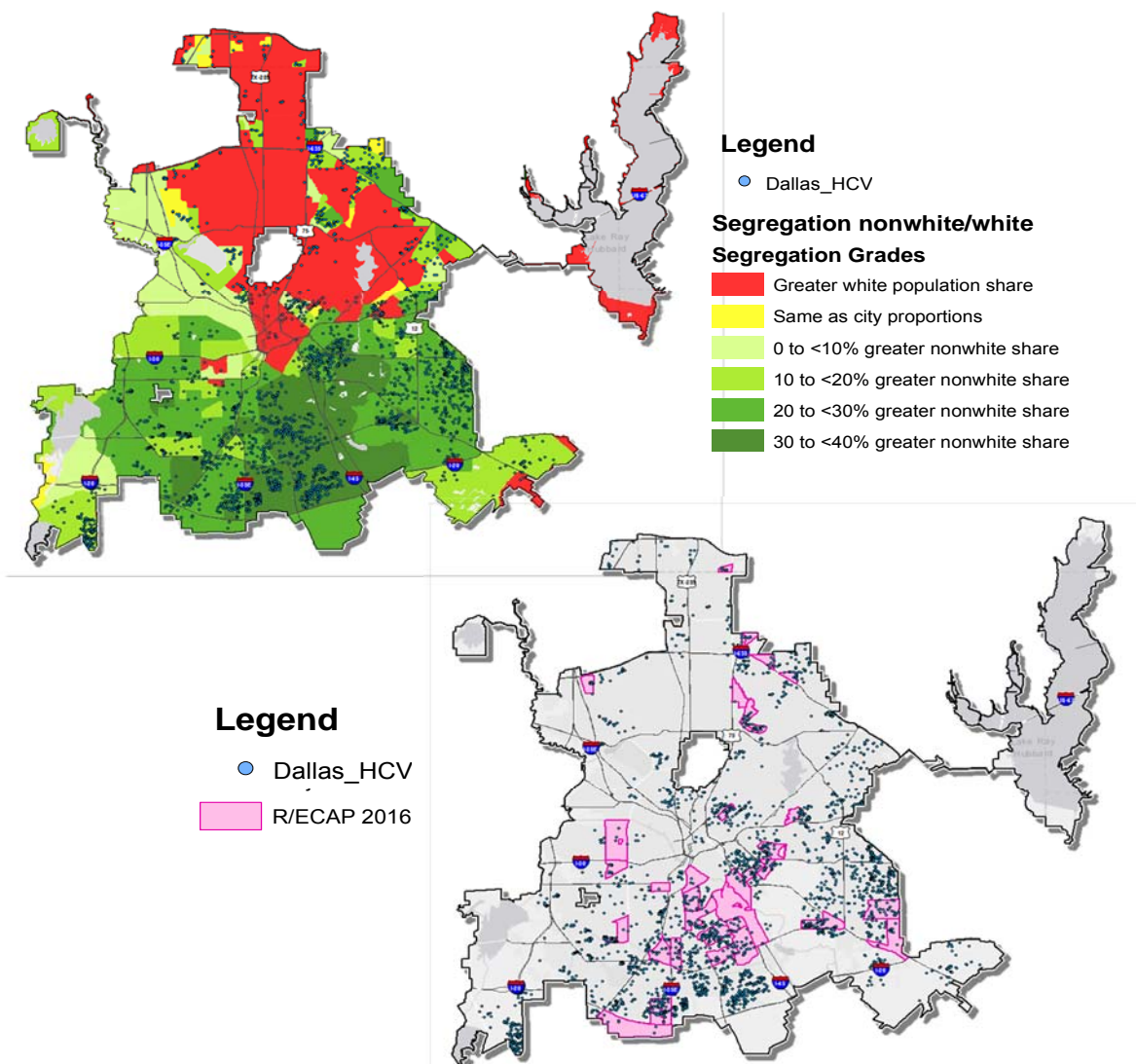

Figure 49: HCV residential patterns with respect to segregation and R/ECAPs, Dallas

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Locating Project Based Section 8

The study retrieved Project-based Section 8 data from the Picture of Subsidized Households database (2017) and geolocated 25 developments (Table 26). Among these 25 developments, 22 developments appeared in predominantly non-white census tracts, and six occurred in tracts the most segregated (at least 30% greater nonwhite share) census tracts.

Six Project Based Section 8 projects are located within a R/ECAP-designated census tract: Cathedral Gardens, Cherokee Village, Trinity Apartments, Mirasol FKA Lake June, Royal Crest and St. James Manor Apartments. The poverty rate of the neighborhoods varies from 44% to 57%. The poverty rates for the other Project-based Section 8 properties located in segregated areas range from 20% to 38% while the poverty rates for those located in non-segregated areas range from 11% to 30%.

Program label	Name	Subsidized units available	% VLI	% ELI	% assisted HHWD	Segregation Grade	R/ECAP 2016	%non-white	Pov 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

90

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

Table 26: Project-based Section 8 location characteristics

Locating Public Housing

The analysis retrieved Public Housing data from the Picture of Subsidized Households database (2017) and geolocated 16 developments (Figure 50). Among these developments, 12 developments appeared in predominantly non-white census tract, and nine developments occurred in the most segregated (at least 30% greater nonwhite share) census tracts.

Four public housing projects appear within a R/ECAP-designated census tract: Frazier, Brackins Village, Cliff Manor, and Hamptons at Lakewest. The poverty rate of these neighborhoods varies from 49% to 59 while the poverty rates for the other public housing developments range from 29% to 39%.
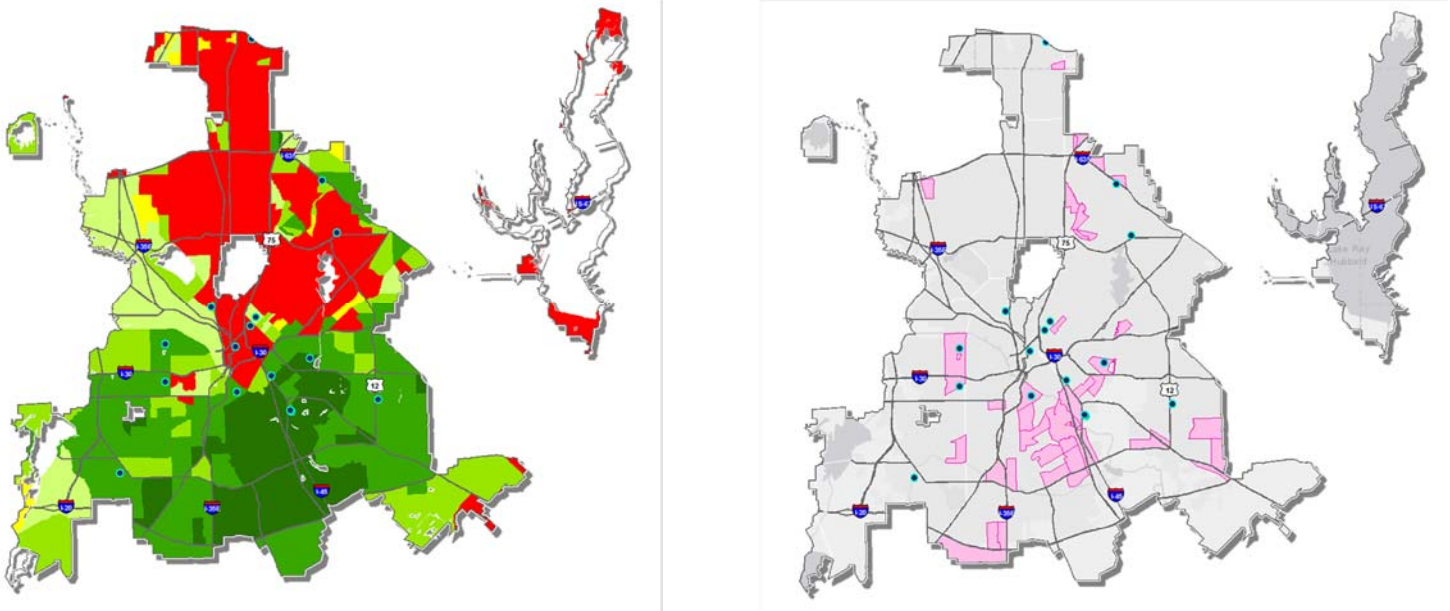

Figure 50: Public housing locations with respect to segregation and R/ECAPs

Locating Low Income Housing Tax Credits

The analysis retrieved Low Income Housing Tax Credit (LIHTC) data from HUD's Low-Income Housing Tax Credit Database, and geolocated 159 developments. About 29 developments appeared in census tracts with a non-white population share at least 30% greater than the city average (darkest green shade), and 101 of the LIHTC developments appeared in census tracts with a non-white population share at least 20% greater than the city average. On the other hand, 24 LIHTC developments appeared in predominantly white census tracts (red shade). R/ECAP-designated census tracts contained 56 of the LIHTC properties.
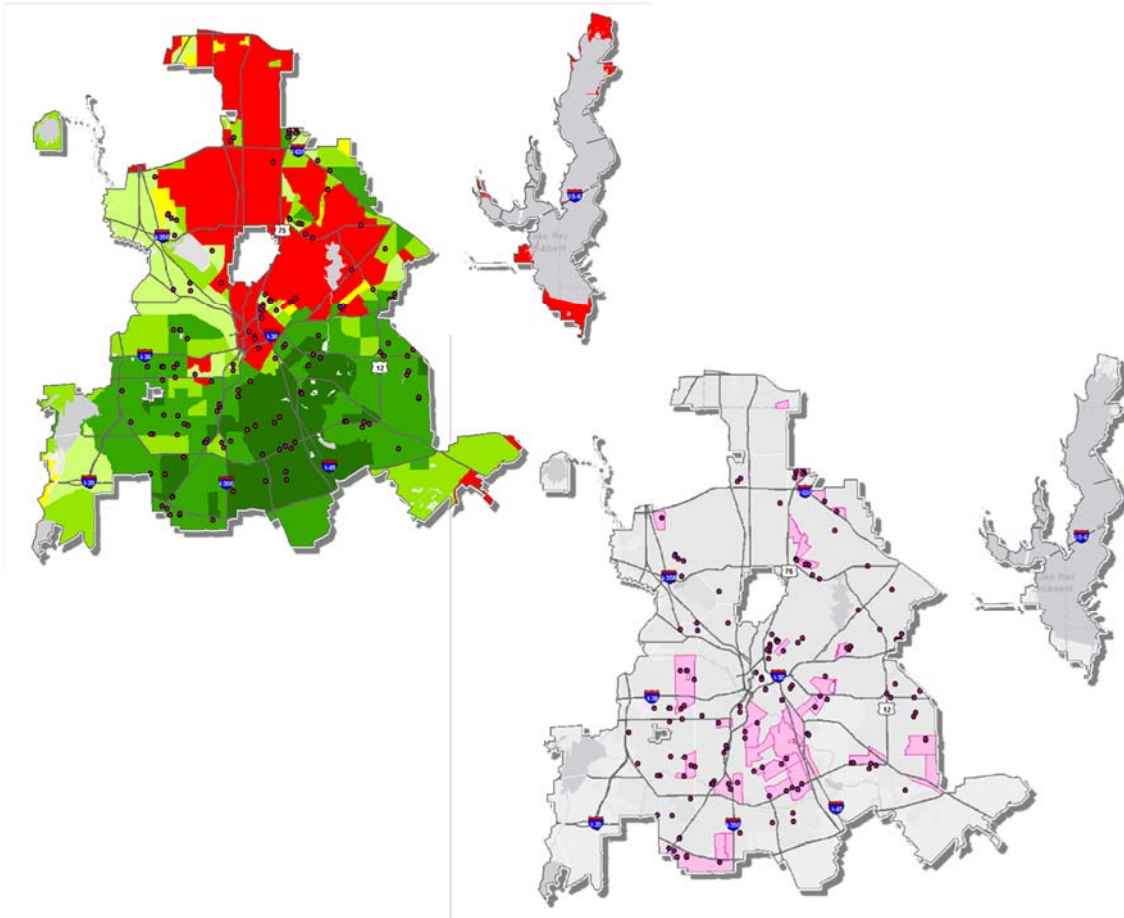

Figure 51: Low Income Housing Tax Credit developments locations with respect to segregation and R/ECAPs

Characteristics of Publicly Supported Housing Location

Table 27 shows the average share by race and ethnicity and median income of the census tracts containing each housing program (i.e. development or household). The analysis geolocates the developments and families, extracts locational information and then derives averages at the census tract level. Overall, the programs appear to be used and implemented more frequently in lower income and non-white locations. The HCV program appears to provide the opportunity to locate in tracts with higher median income than the other 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%	48%
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

Table 27: Average racial/ethnic composition and median income of census tract by publicly supported housing programs

Table 28 contains the averages for each index at the census tract and block group level for the geographic unit containing each housing program (i.e. development or household). Overall, programs tend to register comparable scores across indices. The developments and HCV families tend to locate in areas of relatively high poverty exposure (low poverty index scores). On the other hand, the transportation indices suggest that developments appear to be transportation-affordable and transit-accessible areas[6]. Section 202 and 811 developments score higher than other HUD programs on the school index, which indicates a greater access to proficient schools. Section 811 developments outperform other programs with respect to access to transportation, jobs and schools.

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

Table 28: Average opportunity index score by publicly supported housing programs

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[6] Refer to appendix for description and limitation of indices

Housing Choice Voucher Homeownership Program

In addition to rental assistance, the housing choice voucher program also supports homeownership for first-time homebuyers through the DHA HCV Homeownership Program. The program allows first-time homebuyers to use voucher assistance toward the purchase of a home. According to DHA's website:

"The Housing Choice Voucher (HCV) Homeownership Program was created by HUD to assist low-income, first-time homebuyers in purchasing homes. Through the Homeownership option, a public housing agency may provide voucher assistance for an eligible family that purchases a dwelling unit for residence by the family. To participate in the HCV homeownership program, the HCV family must meet specific income and employment requirements (the employment requirement does not apply to elderly and disabled families), be a first-time homeowner as defined in the regulation, attend and satisfactorily complete the pre-assistance homeownership and housing counseling program required by the PHA, and meet any additional eligibility requirements set by the PHA.

For the purposes of this program, a first-time homebuyer is defined as:

- A single parent or a displaced homemaker who, during the preceding three years, was married and, while married, owned a home with his or her spouse, or lived in a home owned by his or her spouse.

- A family that includes a person with a disability, in which any member has owned a unit during the preceding three years, but for which the PHA determines that the use of the homeownership option is necessary as a reasonable accommodation to make the program accessible to the family."

Potential homebuyers complete a first-time homebuyer training course and have to meet other qualifications. The program is structured to allow homebuyers to locate their own homes and to secure financing. DHA can assist with securing financing through relationships developed with lenders. The family is also responsible for hiring an independent professional inspector to inspect the property. DHA will conduct an initial Housing Quality Standard (HQS) inspection to determine if the property is decent, safe and sanitary. Under the program, families are responsible for a minimum of 1 percent of the homes sale price as the down payment.

Current voucher program participants or those eligible to participate in the HCV program qualify for the program if they are:

- Able to secure a mortgage loan based on income, credit and debt;
- First-time homebuyers (no member of the household has had ownership in a principal residence in the past three years)
- Families with one adult family member who has an income equal to or greater than the federal minimum wage multiplied by 2000 hours and who has been employed on a full-time basis and continuously for at least one year
- Disabled families whose annual income is equal to the minimum monthly Federal Supplemental Security Income (SSI) X 12 (welfare assistance no included for eligibility) and
- Those who have not previously defaulted on a mortgage while participating in the program and who can satisfy other initial eligibility requirements.

Recent City Housing Accomplishments and Use of Resources

The City of Dallas is an entitlement community and receives federal funds from the U.S. Department of Housing and Urban Development (HUD) annually. The City receives funds under its Consolidated Plan for the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Housing for Persons with AIDS (HOPWA), and Emergency Solutions Grant (ESG) Programs. As part of the Consolidated Planning process, the City is required to prepare an annual report of its accomplishments known as the Comprehensive Annual Performance Evaluation Report (CAPER). The CAPER generally 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 2009-2018 program years and the 2013-2018 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 non-profit and for-profit developers, subrecipients, 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 2013-2019 Consolidated Plan, insufficient affordable housing in Dallas for lower income families exists. 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.

Fair Housing Accomplishments

To address fair housing, the Fair Housing Office provides the following services:

- Discrimination complaint Intake
- Investigates and enforces discrimination complaints
- Conciliation and mediation
- Fair housing training
- Approve and monitor Affirmative Fair Housing Marketing Plans
- Government-assisted Affordable Housing List
- Housing and Disability Resource Guide

The CAPERs demonstrate that the City of Dallas has participated in several activities to address its pledge to "affirmatively further fair housing." According to the CAPERs, in addition to enforcement activities, the City through the FHO affirmatively furthered fair housing by:

- Engaging in education of its citizens, employees, and housing providers on fair housing rights and responsibilities;
- Promoting fair housing by marketing on local radio stations, television, and in newspaper advertisements;
- Distributing affordable housing referral packets;
- Maintaining and updating a list of government-assisted affordable multifamily units for distribution to citizens;
- Monitoring affirmative fair housing marketing plans for City-assisted multifamily family housing developments; and
- Observing Fair Housing Awareness Month and conducting seminars and other meetings that increase awareness and knowledge of fair housing.

October 2010 – September 2011

- The Fair Housing Office spent $19,392.50 in advertising – this consisted of 55 radio advertisements, of which 30 were conducted in Spanish and 40 newspaper advertisements, of which 16 were printed in Spanish newspapers. In addition, the Office purchased 25 spots (advertisements) on a Spanish television station.
- The Office conducted 53 outreach activities.
- During Fair Housing month, the Office partnered with NACA and the City Credit Union to educate the public on fair housing and the mortgage lending process.
- The Fair Housing Office partnered with the Women Council of Dallas Association of Real Estate Brokers and Bank of America to provide fair housing and educational information to address barriers to low-income and the minority population.
- The Fair Housing Office partnered with LULAC to provide fair housing and human relations information to the GLBT community.
- The Fair Housing Office partnered with the Southeast Dallas Hispanic Chamber of Commerce and provided educational information to the Hispanic community during Hispanic Festival
- The Fair Housing Office partnered with the Greater Dallas Hispanic Chamber of Commerce to provide fair housing and human relations information to the Hispanic community at the Viva Dallas Expo.
- The Fair Housing Office provided (5) fair housing training to DHA staff and resident councils.
- The Fair Housing Office provided 587 housing referral packets, which included resources for disabled persons

October 2011 – September 2012

- The Fair Housing Office spent $20,433.72 in advertising – this consisted of 138 radio advertisements, of which 106 were conducted in Spanish and 60 newspaper advertisements, of which 16 were printed in Spanish newspapers. In addition, the Office purchased 35 spots (Advertisements) on a Spanish television station.
- The Office conducted 49 outreach activities.
- During Fair Housing month, the Office partnered with City Credit Union and Metro-Tex Association of Realtors to educate the public on the mortgage lending process.
- The Fair Housing provided (1) fair housing training to DHA staff and resident council.
- The Fair Housing Office partnered with the Greater Dallas Hispanic Chamber of Commerce to provide fair housing and human relations information to the Hispanic community at the Viva Dallas Expo.
- The Fair Housing Office partnered with the Women Council of Dallas Association of Real Estate Brokers and Metro-Tex Association of Realtors to provide fair housing information and encourage lender education on the mortgage lending requirements.
- The Fair Housing Office provided 500 housing referral packets, which included resources for disabled persons.

October 2012 – September 2013

- The Fair Housing office spent $13,971.00 in advertising – this consisted of 115 Spanish radio advertisements and 45 newspaper advertisements, of which 16 were printed in Spanish newspapers.
- The Office conducted 68 outreach activities.
- During Fair Housing month, the Office partnered with the City Credit Union to provide fair housing information and lender education on the mortgage lending process and eligibility requirements.
- The Fair Housing Office provided fair housing training to 20 Dallas County Housing staff members.
- The Fair Housing Office provided 425 housing referral packets, which included resources for disabled persons

October 2013 – September 2014
- The Fair Housing office spent $17,886.15 in advertising – this consisted of 197 radio advertisements, of which 150 were conducted in Spanish and 65 newspaper advertisements, of which 14 were printed in Spanish newspapers. In addition, the Office purchased 35 advertisements on a Spanish television station and 50,000 email advertisements.
- The Office conducted 77 outreach activities.
- Held Analysis of Impediments meetings and distributed Analysis of Impediments Surveys to Citizens, Civil Rights, Advocacy & Faith Based Organizations, Real Estate Community & Mortgage Institutions, CHODOs, Chambers of Commerce & Developers and Continuum of Care & Disability Organizations to receive input.
- The Fair Housing Office provided 436 housing referral packets, which included resources for disabled persons
- Received $40,000 Partnership Grant from HUD to increase public access to more information about their rights under Fair Housing law and promote the goal of Affirmatively Furthering Fair Housing by providing training and outreach. Hired 1 bilingual intern that assisted Fair Housing Staff with distributing Fair Housing and Housing literature to 113 organizations (civil rights organizations, Hispanic and faith-based groups) within the city of Dallas.
- Conducted special outreach with the Senior Source, MDHA (Metro Dallas Homeless Alliance) and Veterans Coalition of North Central Texas to provide training and literature to the homeless and disability communities.
- Posted a monthly message to promote Fair Housing on the City of Dallas Facebook page.
- Purchased 1,500 Sexual Orientation and 1,500 Fair Housing brochures. Purchase a variety of promotional items totaling 7,000 items. These materials were utilized to improve outreach to Hispanic, LGBT, Disabled and other underrepresented population.

October 2014 - September 2015
- Distributed 368 government-assisted housing/affordable housing referral packets
- Submitted 2015 draft of the AI to HUD on May 1, 2015
- Approved Fair Housing and Affirmative Fair House Marketing Plan applications for investors and property managers on marketing strategies, advertising and community contact usage requirements when receiving federal funds
- Reviewed and evaluated 23 Affirmative Fair Housing Marketing Plans for City-assisted multifamily housing developments to ensure all marketing results are in order and updated based on their census tract requirements.
- The City used Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funds to rehabilitate 504 housing LMI units.
- Reconstruction was performed on 19 units and 134 units were repaired through the Major Systems Repair Program.
- The People Helping People program rehabilitated 258 units for lower-income elderly and disabled, single-family homeowners.
- Ninety-three (93) units were repaired through the Minor Plumbing Repair/Replacement Program.
- Homeownership assistance was provided to 115 LMI households through the City's Mortgage Assistance Program (MAP). Additionally, 36 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 218 homeless persons, shelter and services to 3,205 individuals, and homeless prevention assistance to 132 persons at risk of becoming homeless.
- Housing Opportunities for Persons with AIDS (HOPWA) funds were used to provide housing assistance to 867 households.
- The City administered 500 units of tenant-based rental assistance for homeless individuals and families using HOME, Shelter Plus Care and Supportive Housing Program funds.

October 2015 - September 2016

- Distributed 368 government-assisted housing/affordable housing referral packets.
- Submitted 2015 final AI to HUD on December 2015.
- Approved Fair Housing and Affirmative Fair House Marketing Plan applications for investors and property managers. Provided guidance to investors and property managers on marketing strategies to affirmatively further fair housing; advertising and community contact usage requirements when receiving federal funds.
- Reviewed 23 plans monthly to ensure all marketing results are in order and updated based on their census tract requirements.
- Dallas City Council formally adopted Neighborhood Plus on October 7, 2015.
- October 1, 2015, the City Manager appointed a Chief of Neighborhood Plus to direct and implement strategies to revitalize and create sustainable communities. • Co-sponsored Accessibility Training with Accessibility First in June of 2016.
- Hired Full Time Title VI/Accessibility Coordinator in May of 2016.
- Over 20 briefings presented to City Council Housing committee as part of the Housing Policy development process.
- Developed a Fair Housing review process for all projects that receive federal or city funding to ensure projects meet fair housing goals.
- The City used Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funds to rehabilitate 439 housing units owned by low- and moderate-income (LMI) households.
- Reconstruction was performed on 12 units and 132 units were repaired through the Major Systems Repair Program.
- People Helping People rehabilitated 204 units.
- Ninety-three (93) units were repaired through the Minor Plumbing Repair/Replacement Program.
- Homeownership assistance was provided to 153 LMI households through the City's Mortgage Assistance Program (MAP).
- Housing Services Program served 26 households through homebuyer outreach, education, counseling, foreclosure counseling and mortgage qualification services.
- Emergency Solutions Grant (ESG) funds were used to provide rapid re-housing to 280 homeless persons, shelter and services to 2,504 individuals, and homeless prevention assistance to 196 persons at risk of becoming homeless.
- Housing Opportunities for Persons with AIDS (HOPWA) funds were used to provide housing assistance to 851 households.
- The City administered 519 units of tenant-based rental assistance for homeless individuals and families using HOME, Shelter Plus Care and Supportive Housing Program funds.

October 2016 - September 2017

- 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, 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, a total of 59 new housing units were constructed and occupied by lower income buyers. Through the use of general obligation bonds funds 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.

October 2017 - September 2018
- Promoted the services of the FHO through three print ads; 1 African American publication, printed bi-weekly and 1 LGBT newspaper printed monthly. And 1 Spanish newspaper printed monthly.
- Sent 70,000 Email advertisements to 50,000 of the public and 20,000 retargeted in the community; purchased 130 radio advertisements to air weekly and run for six months (Spanish language radio). Provided Facebook video posts with 250,000 total impressions Facebook Feeds, Facebook Instant Articles, and Audience Network video link.
- Evaluated and monitored 44 Affirmative Fair Housing Marketing Plans for City-assisted housing developments.
- Received, processed, and made necessary referrals for 2,380 citizen requests for services.
- Distributed 367 government assisted housing/affordable housing referral packets.
- Maintained and updated semi-annually, for distribution to citizens, the list of 238 government-assisted affordable multifamily housing units in Dallas.
- The City used Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds to rehabilitate 127 housing units owned by low- and moderate-income (LMI) households during FY 2017-18.
- The Major Systems Repair Program repaired 124 housing units and reconstruction was completed on 3 housing units.
- Through partnership with Community Housing Development Corporations and other Developers, a total of 35 new housing units were constructed and occupied by lower income buyers.
- Using general obligation bonds funds 54 housing units, single- and multifamily, were constructed.
- Homeownership assistance was provided to 42 LMI households through the Dallas Home Buyers Assistance Program (DHAP), utilizing both CDBG and HOME funds.
- Emergency Solutions Grant (ESG) funds were used to provide an array of services to a total of 9,207 persons experiencing homelessness and those at risk of homelessness. 8,272 individuals received shelter and related services.
- Essential services were provided to 857 and 562 received street outreach services. Homeless prevention services aided 309 persons at risk of becoming homeless, and Rapid Re-housing ensured 64 persons who lost their homes where quickly able to obtain permanent housing.
- Housing Opportunities for Persons with AIDS (HOPWA) funds were used to provide housing assistance and related services to 1,002 unduplicated households. Of these 925 received housing assistance, the remainder, 77 received only supportive services through agencies/organizations that also provide housing/housing assistance.
- The City administered 328 units of tenant-based rental assistance for homeless individuals and families using HOME, Shelter Plus Care, and Supportive Housing Program funds

City of Dallas Housing Programs

In order to address fair housing choice through providing a variety of affordable and accessible housing opportunities, the City of Dallas offers the following housing programs that the Housing and Community Services Department primarily administer:

- *Comprehensive Homeless Outreach Program*

The program serves individuals who are homeless and or ex-offenders through a continuum of care method that includes emergency shelter, case work services, intake and assessment, transitional housing, supportive services, and job readiness placement with the goal of gaining or regaining economic self-sufficiency

Homeless Services oversees and manages all Homeless programs, processes rental and utility payments, case manages clients, and provides bi-weekly home visits to housing residents.

The Homeless Supportive Housing Assistance Program requires participation in supportive services as the participants obtain and remain in stable housing. The supportive services help participants increase skills and/or income, with the goal of becoming self-sufficient.

The supportive services provided to program participants include assessing the needs of the individuals and/or families and facilitating access to ancillary services such as health care, behavioral health care, housing placement, job training and placement, substance abuse treatment, transportation, hygiene, and food.

- *Emergency Shelter Grant (ESG) Rapid Re-housing Program and HOME Tenant-based Rental Assistance (TBRA)*

The program provides services to high-risk adult ex-offenders who have minor children and families. The program will provide case management and referrals that will assist the individuals with re-entry into the community. Staff provides direct services to clients to assist them with employment, housing, education, life skills, mentoring, substance abuse treatment and community services.

- *Project Reconnect*

The program provides non-violent ex-offenders on parole with case management and services or referrals that will assist them with re-entry into the community. Staff provides direct services to clients to assist them with employment, housing, education, life skills, mentoring, substance abuse treatment and community services. Also provides referrals to partner agencies for supportive services.

- *HIV/AIDS Housing and Services*

HIV/AIDS Housing Services provides housing assistance and support services for persons living with HIV/AIDS and their families in the Dallas eligible metropolitan statistical area.

- *City Child Care Services*

The Childcare Program, through partnerships with non-profit agencies, provides childcare for low to moderately low-income working parents and teenage parents who are attending school and do not qualify for any other form of public assistance. Intake/assessments are completed to determine eligibility both on the phone and in-person. Program participants are required to pay a portion towards subsidy amount based on a sliding fee scale.

- *Senior Services Program*

The Senior Services Program provides services on behalf of the 155,000+ adults aged 60 years or older in Dallas and assists the elderly through education, outreach, and information and referral services. The program provides staff support to the City Council appointed Senior Affairs Commission and its various committees. A senior ombudsman provides assistance for complex non-traditional requests and conducts non-emergency home visits. A senior employment contract provides effective job search training and techniques for older adults. Bilingual staff is available.

- *Supplemental Nutrition Program for Women, Infants and Children (WIC)*

WIC is a fully grant-funded Texas Department of State Health Services (DSHS) preventative program that provides low-income pregnant women, new mothers, infants and children up to age 5 with nutritious foods that are high in protein, iron, calcium, vitamin B6 and folic acid. WIC also provides nutrition education, breastfeeding support and improved access to health care and social services in order to prevent nutrition-related problems in pregnancy, infancy and early childhood.

Lactation services and breastfeeding support are available through two specialty facilities, the Dallas Lactation Care Center and Community Baby Café

- *Community Based Development Organizations (CBDO) Program*

The program provides eligible community-based development nonprofits with interim construction financing for building new homes in Neighborhood Investment Program areas.

- *Community Housing Development Organization (CHDO) Program*

The program provides community-based housing development organizations with loans/grants for operating assistance and development funding. These include but are not limited to pre-development costs, development costs, construction subsidies, relocation costs, demolition costs, acquisition costs, related acquisition costs, rehabilitation, home replacement, rental rehabilitation, lease purchase, homebuyer subsidies and operating assistance.

- *Neighborhood Stabilization Program (NSP)*

The program allows the City of Dallas to purchase foreclosed property and pursue land banking, redevelopment, rehabilitation and down payment assistance.

- *Dallas Homebuyer Assistance Program (DHAP)*

DHAP provides assistance to homebuyers at 80% (or less) of Area Median Family Income (AMFI) for principal reduction, down payment, and closing costs. The amount of assistance will be based on need as determined by the program underwriting guidelines. The purchase property must be within the city limits of Dallas.

Fair Housing Actions

- The City of Dallas established a Fair Housing/Human Rights Office (FHO) with the mission "to promote and preserve housing choice without regard to race, color, religion, sex, national origin, handicap, familial status or sexual orientation; and to promote and preserve equal employment and public accommodations without regard to sexual orientation."[7] In 2005, the City of Dallas was granted final certification as a substantially equivalent fair housing agency. This means that HUD has determined that the City enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. After a certification determination, HUD refers complaints of housing discrimination that it receives to the City for investigation. Further information is included in the Fair Housing Complaint Data section of this AI.

- Fair Housing is a shared concern, regionally and locally, in the City and the County. The City of Dallas completed its last Analysis of Impediments (AI) to Fair Housing Choice in 2015. The analysis identifies barriers to fair housing choice, to prevent and address discriminatory housing practices based on race, color, national origin, sex, religion, disability and familial status. In the years since, the City has initiated activities to address the impediments identified, as detailed within this AI.

- During FY 2017-18, the City developed a Comprehensive Housing Policy to better serve low-income families and better utilize the limited funding sources available to the Housing and Neighborhood Revitalization Department. Along with a Comprehensive Housing Policy, the city revised its home repair, homebuyer assistance and development programs to better align the needs of the city with the Comprehensive Housing Policy and funding.

- The Neighborhood Plus Plan is a citywide neighborhood revitalization plan intended to update the forwardDallas! Housing and Neighborhood elements. The Neighborhood Plus Plan focused on creating a collective impact framework, alleviating poverty, fighting blight, attracting and retaining the middle class, increasing home ownership, and enhancing rental options. The Plan recommends the use of a holistic approach to pursue these goals.

- The Fair Housing Office 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.

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[7] Dallas Fair Housing/Human Rights Office website, http://dallascityhall.com/departments/fairhousing/pages/default.aspx Accessed April 21, 2015

City Regulatory Review

Accessibility

Section U.S.C 3604 (f)(3)(C) and (f)(7) of the Fair Housing Act defines discrimination as a failure to design and construct covered multi-family housing (building of four or more units) for first occupancy after March 13, 1991 in a manner that allows those buildings to be readily accessible and useable for persons with disabilities. Accessibility and use includes items such as wider doors and passages for wheelchairs, and adaptive design features such as accessible ingress and egress, accessible switches and outlets, reinforced bathroom walls for later grab bar installation, and usable kitchen and bathroom spaces for wheelchair maneuverability.

The provisions of the Act cover a wide range of residential housing including, but not limited to, apartments, condominiums, singe room occupancy units, public housing, extended stay and residential hotels, nursing homes, dorms, shelters, and other units funded through federal block grant funds. Any redevelopment of an existing property to add public and common areas or four or more units is considered a new building and subject to the provisions. Per U.S.C 3604 (f) (7), for buildings that meet the criteria of four or more units and have at least one elevator, all units are subject to the provisions. For covered buildings without an elevator, only the ground floors and common use areas are subject to the provisions. While single-family detached units are not typically subject to the provisions, those that are funded with federal block grant funds may be subject to the provisions.

In addition to provisions in the FHA, the following requirements apply to accessibility of residential units:
- The Architectural Barriers Act (ABA) Standards – applies to facilities designed, built, altered, or leased with federal funds
- Section 504 of the Rehabilitation Act of 1973 – applies to residential units designed, built, altered, or leased with federal funds
- Uniform Federal Accessibility Standards (UFAS) or a stricter standard (41 CFR Ch. 101, Appendix A) – applies to new constructed housing with five or more units in which 5% or at least one unit, whichever is greater, must be accessible for persons with mobility disabilities. Also, 2% of the units or at least one unit, whichever is greater, must be accessible for persons with visual or hearing disabilities.

Constitutional Equal Protection Considerations

Under the current state of the law, a local government cannot adopt ordinances or other regulations based on race, ethnicity, or national origin, even if for their benefit, unless the ordinance or regulation are justified by a compelling governmental interest and are narrowly tailored to further that interest. Comprehensive planning must be adopted with regard to this "strict scrutiny" limitation.

Inequity and Challenges to Fair Housing

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[8] interviews, Rothstein highlighted some of these policies and practices, which have negatively affected residential patterns.

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[8] 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

- 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.

Source of Income Discrimination

The ability of 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.

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 DHA's HCV 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 where 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; they define these as census tracts with a median income at or above 80% of the Area Median Income, no more than 10% of residents with incomes below the federal poverty rate and public schools that meet the standards of the Texas Education Agency and have 4-year graduation rates of 85% or higher.

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."

NIMBYism in Dallas

Resistance to new or different housing is often referred to as "Not in my backyard" or NIMBYism. NIMBYism is based on the fear that the proposed housing is to be occupied by individuals in some way different from those already residing in the area. Stereotypes often get combined with fears such as loss in property values, attraction of crime, and substandard housing and results in neighborhood resistance. Over the course of public participation in Dallas and throughout the region, a significant emphasis on the importance of overcoming NIMBYism in order to promote fair housing occurred.

NIMBYism is most effectively addressed through education and awareness that results in corrected perceptions and elimination of stereotypes. The City has actively pursued such education efforts through its Fair Housing Office.

Review of the ForwardDallas! Comprehensive Plan

The reviewing of the City's forwardDallas! Comprehensive Plan identifies the extent that the Comprehensive Plan helps the City implement its commitment to equal housing opportunity and the extent any portions of the plan may serve as impediments to fair housing choice for persons protected by the FHA. As such, the review covers six subject areas selected because of their correlation with fair housing choice:

1. Inclusion of Protected Group Demographic Description
2. Plans for Affordable Housing/Diverse Community
3. Reference to CDBG or Other Federal Housing Programs
4. Affirmatively Furthering Fair Housing
5. Compliance with Applicable Laws and Regulations
6. Other Items

The Dallas City Commission adopted by Ordinance No. 26371 and passed the forwardDallas! Comprehensive Plan in June 2006 and amended the plan in 2013. The Plan was prepared with a broad range of input from the community. ForwardDallas! builds from other plans such as the 1994 Dallas Plan, the 1987 City of Dallas Growth Policy Plan, the adopted Trinity River Corridor Comprehensive Land Use Plan, the Strategic Engagement Economic Development Plan and the many small Area Plans such as the Inside the Loop Plan, Arts District Plan and the Fair Park Comprehensive Development Plan.

In general, a comprehensive plan represents a long-term guide for the development of a community by outlining existing conditions and providing goals, policies, and actions to meet future needs as determined by factors such as population, economic conditions, and impacts of regional change. Comprehensive plans are typically developed with input from stakeholders in the community and function as a living document used in the decision-making process by current and future community leaders. The comprehensive plan provides guidance for the City's future in regard to the type and intensity of development, land uses, and open space.

ForwardDallas! is comprised of four major components: a Vision, Policy Plan, Implementation Plan, and Monitoring Plan.

The Vision for the City is a broad perspective of the future of the city based on the desires of its residents. The Vision includes six core values that represent the foundation for the plan's objectives and recommendations. The six priorities of the community are:

1. Education
2. Public Safety
3. Healthy Environment
4. Job Growth
5. Convenient Choices
6. Quality of Life

For fair housing, quality of life includes the availability of diverse housing choices due to Dallas' diverse population. Using the core values, common themes emerged at public meetings held to garner input on the plan. These themes also form the basis for guiding principles in the policy plan. Some of the key themes that relate to housing and that may impact fair housing choice include protecting and preserving existing neighborhoods, building on the success of historic preservation in the community, matching housing with jobs, improving opportunities for homeownership, and providing housing choices for people at various income levels.

The policy plan covers seven areas and is the outline to bring the City's vision to reality. The seven areas are land use, economic development, housing, transportation, urban design, the environment and neighborhoods. Each element of the plan includes goals, policies and implementation measures to achieve the vision. The policy plan includes five guiding principles that tie back to the core values identified in the vision:

1. Economic Development;
2. Housing and Community;
3. Social Equity;
4. Environmental Sustainability; and
5. Transportation and Infrastructure.

The Housing and Community Principle focuses on providing new housing choices to citizens of all income levels, and the Social Equity Principle fosters equal access to quality housing, jobs, education and healthcare.

The Implementation Plan provides a timeline for accomplishing the policy plan implementation measures or actions. The fourth component of forwardDallas!, the Monitoring Program, establishes a tracking mechanism to monitor progress as well as changes in the city. This section of the plan also provides the basis for annual reports, adjustments and updates to the forwardDallas! Policy Plan.

Section 3

The Section 3 Program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low or very low-income residents in connection with projects and activities in their neighborhoods. In Dallas, DHA has an active, nationally recognized Section 3 program and strongly supports opportunities for Section 3 residents to access education, training, and employment and has consistently exceeded the numerical goals in the expenditure of the covered assistance. Where applicable, the DHA procurement process includes in its selection criteria efforts to employ Section 3 resident.

DHA has a scholarship and intern program through the DHA Opportunity Rising Foundation, formerly known as Phoenix Foundation. Since 1997, DHA has awarded more than $1.4 million in college scholarships to more than 1,000 students. In 2018, DHA awarded approximately $64,000.00 in scholarships to 37 students. Also, in 2018, DHA employed 12 college and high school students through its summer internship program. Additionally, the Section 3 program promotes economic development and self-sufficiency through entrepreneurial and community reinvestment opportunities through DHA's resident and employment coordinators work closely and directly with residents in providing employment, education, and training opportunities through DHA's partnership with potential employers and with for-profit and nonprofit entities in the community.

Community Participation in the Planning Process

As mentioned above, the development of forwardDallas! included significant public participation. The City organized a 75-member Advisory Committee comprised of business leaders, neighborhood representatives, public agency leaders, and concerned citizens. In addition, the City used various methods to gather input on the Plan. Specifically, they conducted the following activities:

- A scientific and representative public opinion survey (a telephone survey evenly distributed across all council districts, in-depth interviews with community leaders and person-on-the-street interviews) with almost 800 respondents.
- An eight-page insert published in the Dallas Morning News.
- Nine community workshops and two citywide workshops.
- Ten open houses to solicit feedback from the workshops and to present interim results.
- Ten Advisory Committee meetings.
- More than 100 meetings with stakeholder groups, including neighborhood associations and business groups.
- Two public meetings on the draft version of forwardDallas!
- Ten small-group work sessions on the draft attended by some Advisory Committee members, elected officials and the public.

In developing Dallas' new housing policy, the Neighborhood Plus Plan, the City has implemented a process to encourage input and involvement from residents. The City has held several events including community workshops throughout the city in English and Spanish to identify and prioritize issues and identify opportunities to improve neighborhoods. The City has also hosted a neighborhood block party, National Night Out, and attended community festivals to inform residents about the new direction the City is taking to improve all the neighborhoods in Dallas.

The Downtown Dallas 360, adopted in 2011, included an 18 month planning process, which a Steering Committee, Technical Committee, and Project Management Team led. The Steering and Technical committees included representatives from City departments and organizations, stakeholder groups and corporations such as Dallas Area Rapid Transit (DART), Dallas Convention and Visitors Bureau, Dallas Convention Center, private developers, Downtown Residents Council, and Downtown Dallas Inc. (DDI). Two community forums and multiple sessions with area stakeholders, Dallas City Council members and key staff helped garner additional community and staff input.

The Trinity River Corridor Comprehensive Land Use Plan also had an extensive public process that included opportunities for input utilizing five methods: individual comments, stakeholder meetings, community workshops, meetings with interested organizations, and briefing and input from official groups including the Dallas City Council, City Council Trinity River Committee, City Plan Commission, and Park and Recreation Board.

Finally, the City of Dallas and North Texas Regional Housing Assessment solicited significant public engagement over the course of the Assessment of Fair Housing, which served as the foundation for this AI. Engagement efforts included focus groups, public meetings, and surveys, which combined to reach thousands of Dallas residents. This effort is covered in further detail within Section V, "Public Outreach".

Based on the review of these planning documents, the City regularly seeks citizen input and encourages public participation in its planning process. The City should continue citizen participation activities and include persons from all racial, ethnic and religious groups as well as persons with disabilities.

Zoning Code

Zoning Ordinances are enforceable in courts of law by the local community and warrant closer attention to ensure that the ordinances help the community "affirmatively further fair housing" and do not, either intentionally or unintentionally, serve as "impediments to the exercise of fair housing choice". Dallas'

Development Code review covers key areas that have an impact on fair housing choice including zoning, building regulations, accessibility standards, and other policies and practices. The analysis reviews the following subject areas:

- Minimum Lot Size for Single Family Residential
- Definition of "Family"
- Group Living Facilities
- Multifamily Maximum Structure Height and Densities
- Other Comments

Minimum Lot Size for Single Family Residential

The City's zoning regulations relating to residential development include 20 residential districts comprised of single family, duplex, townhouse, multifamily, and manufactured home districts. The variety in the zoning districts indicates a broad range of land use and density categories to promote housing variety. Of the 20 residential districts, seven are single family districts with minimum lot sizes ranging from 5,000 square feet to one acre lots. Section 51A-4.410 – Schedule of Yard, Lot and Space Regulations provides the minimum lot dimensions for all zoning districts (Table 29).

Residential Zoning District	Minimum Front yard (in feet)
R-ac Single family district 1 acre	40
R-1/2ac Single family district ½ acre	40
R-16 Single family district 16,000 sq. ft.	35
R-13 Single family district 13,000 sq. ft.	30
R-10 Single family district 10,000 sq. ft.	30
R-7.5 Single family district 7,500 sq. ft.	25
R-5 Single family district 5,000 sq. ft.	20

Table 29: Setbacks for each Residential Zoning District

Single family residential uses also represent the primary residential use in the townhouse districts and the clustered housing district. These districts accommodate smaller lot sizes of at least 2,000 square feet. Additionally, the City of Dallas adopted Section 51A-4.900, Affordable Housing, of the Development Code. The purpose of the Affordable Housing section is to:

- Encourage the provision of dwelling units affordable to families of low income throughout the city;
- Ensure that these dwelling units are safe, sanitary, decent, and otherwise substantially equivalent to public housing in the city
- Ensure that these dwelling units are available in a variety of sizes to the same extent as throughout the city
- Otherwise promote the general welfare of the city and its residents

The Affordable Housing section of the development code applies to lots in a Standard Affordable Housing (SAH) district. The SAH district is comprised of multifamily and mixed-use districts as follows: MF-1(SAH), MF-2(SAH), MU-1(SAH), MU-2(SAH), and MU-3(SAH). The Affordable Housing section is applicable when an application is made for a building permit that would increase the dwelling unit density permitted in that district above the number permitted by right. The City Council may also impose an SAH requirement in a planned development district that allows 15 or more multifamily dwelling units in the district. Single family units are not permitted by right in the MU2(SAH), and MU-3(SAH) districts.

Definition of "Family"

The definition of families in a zoning ordinance represents a potential concern because the Fair Housing Act requires that groups of unrelated persons be treated equally as traditional families and be held to the same regulatory requirements. The City indicated in the questionnaire on public policies and practices that the

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definition of family in the Development Code does not prevent unrelated individuals from sharing the same home. The City's Development Code defines a family as individuals living together as a single housekeeping unit in which not more than four individuals are unrelated to the head of the household by blood, marriage, or adoption.

The current definition of family limits the number of unrelated persons in a home to a maximum of four individuals. The Dallas Development Code allows a larger number of unrelated persons to reside in handicapped group dwelling units; therefore, the cap on unrelated persons does not negatively impact persons with disabilities.

Group Living Facilities

The City's Development Code defines handicap as (i) a physical or mental impairment that substantially limits one or more major life activities, (ii) a record of a physical or mental impairment, or (iii) being regarded as having a physical or mental impairment. The Development Code does not restrict housing opportunities for individuals with disabilities nor deny housing with supportive services. The code does include restrictions for senior housing for persons 55 years of age or older, which is in compliance with Federal law on housing for older persons. The Development Code includes three group living facilities (i.e. group residential facilities, handicapped group dwelling unit, and retirement housing) classified as residential use and serving older adults and persons with disabilities.

Group Residential Facility

The code defines a group residential facility as an interim or permanent residential facility that provides room and board to a group of persons who are not a "family", whether or not the facility is operated for profit or charges for the services it offers. Group residential facilities do not include:

- Facilities that negotiate sleeping arrangements on a daily basis
- Dwelling unit occupied exclusively by families
- Any other use specifically defined in the code.

Group residential facilities have density restrictions that allow up to 160 dwelling units or suites per net acre or 320 beds per net acre. This use must comply with statutory licensing requirements. When located at least 1,000 feet from all other group residential facilities and handicapped group dwelling units, the use in permitted by right in the clustered housing, multifamily, central area, and mixed-use districts; otherwise, by SUP only in the same districts.

Handicapped Group Dwelling Unit

The code defines a handicapped group dwelling unit as a single dwelling unit that is the domicile of not more than eight handicapped persons who are not a "family", and who are persons living together as a single housekeeping unit. The code allows up to two supervisory personnel to reside on the premises. Supervisory personnel are counted as part of the eight total occupants only if they reside at the dwelling and typically such personnel do not reside there. Thus, in the typical dwelling, up to eight handicapped persons reside at the dwelling.

Handicapped group dwelling units are permitted by right in all residential districts and in the central area and MU-1 districts so long as they are at least 1,000 feet from all other handicapped group dwelling units and group residential facilities; otherwise, by special use permit only in the same districts.

Additional provisions in the code state that no certificate of occupancy is required for the use. The code also states that the use liberalizes current restrictions on the number of unrelated persons who may reside together in a dwelling unit for the exclusive benefit of handicapped persons seeking to permanently reside together as a single housekeeping unit. The City of Dallas' policies on handicapped group dwelling units has been challenged in court and found to be non-discriminatory. Hundreds of group homes appear throughout Dallas.

Retirement Housing

The code defines retirement housing as a residential facility principally designed for persons 55 years of age or older that does not include a convalescent or nursing home, hospice care, or related institutions. The maximum number of dwelling units or suites per net acre is 160 in the townhouse, clustered housing, and multifamily districts.

The code defines adult day care facilities as a facility that provides care or supervision for five or more persons 18 years of age or older who are not related by blood, marriage, or adoption to the owner or operator of the facility. This use is permitted by right in retail, industrial, mixed-use, and several commercial districts. Additionally, the use is by right as a limited use in MF-3(A), MF-4(A), and office districts. Adult day care facilities require a special use permit in residential districts.

The Texas Department of Aging and Disability Services (DADS) administers long-term services and support for seniors and people with intellectual and physical disabilities. DADS also licenses and regulates providers of these services. DADS regulates adult day care facilities, assisted living facilities, nursing facilities and skilled nursing facilities, home and community support service agencies including home health agencies, and hospices, publicly and privately operated intermediate care facilities for individuals with an intellectual disability or related conditions, publicly and privately operated Home and Community-based Services waiver providers, and publicly and privately owned Texas Home Living waiver providers.

Multifamily Maximum Structure Height and Densities

According to the chart of zoning rules on the City's website, in multifamily districts where the primary use is residential, districts MF-1(A) and MF-2(A), the maximum building height is 36 feet. Districts MF-3(A) and MF-4(A) which in addition to residential uses support limited retail and personal services uses go up to 90 feet and 240 feet, respectively. Special standards such as residential proximity slope are also imposed assuring that single family neighborhoods are protected. Multifamily housing, defined as three or more dwelling units per lot are permitted by right in the clustered housing, multifamily, central area and mixed-use districts. The inclusion of multifamily and high-density housing encourages the development of affordable housing.

Off-Street and Handicap Parking

According to the questionnaire completed by the City, the requirements for all uses with respect to handicap parking is that handicapped parking must be provided and maintained in compliance with all Federal and State laws and regulations. In regard to required off-street parking, group residential facilities must have 0.25 spaces per bed, plus one space per 200 square feet of office area or a minimum of four spaces is required. Single family uses and handicapped group dwelling units are required to have one space in R-7.5(A), R-5(A), and TH districts and two spaces in all other districts. Multifamily districts require one space for each 500 square feet of dwelling unit floor area within the building site, except that in central area districts, only one space for each 2,000 square feet of dwelling unit floor area within the building site is required and handicapped parking must be provided if more than ten off-street parking spaces are required for this use. If a special use permit is required for any use, the off-street parking requirement may be established in the ordinance granting the special use permit.

Planned Development District

Chapter 51P of the Development Code provides regulations for planned development districts (PDDs). A PDD is a customized zoning district intended for larger scale, mixed use development which would not be possible within any of the standard zoning districts. Development standards such as height, setbacks, and allowed uses are contained within the ordinance written specifically for the PDD.

Accessory Structures

On June 27, 2018, City Council approved two different options, each with very specific regulations, that allow Accessory Dwelling Units (ADUs) to be built and/or rented. However, action is required by the City (on one of the two options below) before an ADU can be built. ADUs are not allowed to be built by right in most cases.

Accessory Dwelling Unit Overlay (ADUO):

A neighborhood driven process where a neighborhood submits an application to the City to create an overlay that would allow ADUs. A neighborhood committee consisting of at least 10 property owners within the proposed overlay area would form and provide to the department a list of Committee members, boundary map and plat of neighborhood or area of request.

City staff would conduct a neighborhood meeting, with notices sent to all property owners within the area of request and generate the petitions necessary for signature. The neighborhood committee is responsible for gathering the signatures and submitting the petitions to the City for verification. Petitions must be signed by more than 50% of the property owners within the area of request and verified by staff in order for an application for on overlay to be considered.

Once an application has been submitted to the department, the request for an overlay will be scheduled for City Plan Commission (CPC) consideration at a public hearing. If approval is recommended at the CPC, it will be scheduled for City Council (CC) consideration at a public hearing. If the CC approves, an Accessory Dwelling Unit Overlay is placed over the neighborhood and property owners may then submit necessary plans and documents to Building Inspection for permits to build an ADU.

Board of Adjustment process: Ordinance

A property owner may file an application with the Board of Adjustment (if applicable for their property) requesting a special exception to allow an additional dwelling unit to be built and/or rented.

An application is submitted to the Building Inspection Division at the Oak Cliff Municipal Center, 320 East Jefferson, Room 105. This is where one can obtain a Board of Adjustment application, a checklist of what materials are needed to be submitted in conjunction with the application, the month in which the completed application would be scheduled before one of the three board panels, and the amount for the related application filing fee ($600.00 for an ADU exception).

The Board administrator will schedule the case and will notify the applicant by mail of the hearing date, time, and location. The applicant, or the applicant's representative, is encouraged to attend both the briefing and the hearing. The applicant has the burden of proof to establish the necessary facts to warrant favorable action by the Board. The Board will hear and decide special exception request for an ADU expressly provided for in the zoning ordinance. In general, the Board may grant a special exception when, in the opinion of the Board, the special exception will not adversely affect neighboring property. The Board does not consider how the appeal may benefit the applicant. No case sets a precedent.

Building Codes and Accessibility

Local jurisdictions such as the City of Dallas adopt building or construction codes to regulate building safety and other standards for residential and commercial buildings. These codes are enforced through a permitting and inspection system that authorizes a specific governmental unit, typically a building department, to set fees and carry out actions. The City's Building Inspection Department is responsible for building code compliance.

The building codes used by a City are not required to include or enforce federal accessibility requirements. The responsibility of ensuring that residential projects meet federal accessibility requirements is left to the developers, designers, and operators of such buildings. State and local accessibility requirements must be enforced by the local governmental unit such as the City of Dallas.

The FHA and the American with Disabilities Act (ADA) has design and accessibility standards but does not have a permitting and plan review process for enforcement. However, the issuance of a certificate of completion and building permits by the City's building department does not protect the developer or owner from compliance actions under the FHA and does not pass liability for such compliance unto the City.

Ordinance No. 30321 amended Chapter 53 of the Dallas City Code to adopt the 2015 edition of the International Building Code with certain changes. The building code regulates the construction, enlargement, alteration, repair, demolition, use, and maintenance of construction work in the City. Section 1101.2 of the Building Code states that building and facilities shall be designed and constructed to be accessible with the Dallas Building Code and the International Code. Section 1107.2.1.1 addresses multifamily dwellings and requires compliance with accessibility requirements pertaining to accessible entrances, accessible routes and accessible common and public use areas in multifamily dwellings containing four or more units that were built after March 13, 1991. During plan review, building staff reviews plans to ensure compliance with accessibility standards.

The City has adopted the following requirements for new buildings:

- In buildings that are ready for first occupancy after March 13, 1991, and have an elevator and four or more units
- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs

All units must have:
- An accessible route into and through the unit
- Accessible light switches, electrical outlets, thermostats and other environmental controls
- Reinforced bathroom walls to allow for the later installation of grab bars to kitchen and bathroom areas

If a building with four or more units has no elevator and was ready for first occupancy after March 13, 1991, these standards apply to ground floor units.

The issuance of a certificate of completion and building permits by the City's building department does not protect the developer or owner from compliance actions under the FHA and does not pass liability for such compliance unto the City.

Property Tax Policies

Policies regarding property tax increases and tax relief impact housing affordability. The Texas Property Tax Code allows for property tax exemptions for seniors and persons with disabilities, two groups of people that are generally low income. Each homesteaded household is exempted for $3,000 for county purposes and $15,000 of the appraised value from the school district. In addition to these exemptions, disabled persons and seniors also qualify for an exemption of $10,000 of the appraised value of his or her homesteaded residence. Disabled veterans who are 100% disabled and their surviving spouses are tax exempt.

In addition to property tax exemption for qualified residents, the Texas Property Code also provides tax exemptions to CHDOS, Community Land Trusts, and other developers of affordable housing that is for rent or sale to low- and moderate-income households. Any property that an organization owns for the purpose of building or repairing housing for sale or rental to a low- and moderate-income household without profit may be tax exempt. Each form of tax relief is subject to certain specific criteria and must be applied for. These forms of tax relief reduce or eliminate tax liability for owners and reduce housing costs for renters making housing units more affordable.

Boards and Commissions

The City of Dallas has several boards and commissions that relate to fair housing issues. Other corporate entities related to the City may also have governing boards. Usually, each board requires members to meet specific qualifications and are generally appointed by members of the City Council. The City Secretary oversees the process of receiving nominations for all Boards and Commissions and coordinating with departments that work directly with each board. Maintaining active boards and commissions allows residents of Dallas to have input on the programs and the actions of the City. Some of the City's boards include but are not limited to[9]:

- City Plan Commission

Responsible for making recommendations to the City Council regarding planning and zoning matters, and for administering Chapter 212 of the Texas Local Government Code regarding the platting and recording of subdivisions and additions. The COC appointed two advisory bodies: the Zoning Ordinance Committee (ZOC) and the Urban Design Committee (UDC). The ZOC is responsible for reviewing potential amendment to the City's Development Code and the UDC is responsible for reviewing long range planning and area plans prior to the City Plan Commission consideration.

- Zoning Board of Adjustment

A fifteen-member citizen board appointed by the City Council to hear and take action on variations to the Development Code regulations, on appeal from decisions of the Building Official made in the enforcement of the Development Code and on termination of nonconforming uses.

- Landmark Commission & Task Force

The Landmark Commission is responsible for making decisions regarding Certificate of Appropriateness applications within all City of Dallas historic districts and individually designates structures.

- Southern Dallas Development Corporation Board

Assists in the development and financing of small businesses, create jobs and stimulate the economic growth of Southern Dallas and the Enterprise Zone by promoting investment. The Southern Dallas Development Corporation is a separate corporate entity and is not a City department.

- Community Development Commission

Fosters citizen participation and provides advice and recommendations to the City Manager and City Council on the use of CDBG and other HUD grant funds.

- Housing Finance Corporation Board

Responsible for issuing tax-exempt mortgage revenue bonds and oversee operation of single-family mortgage programs. The Housing Finance Corporation is a separate corporate entity and not a City department.

- Building Inspection Advisory, Examining and Appeals Board

Assists the building official in the administration and interpretation of the building, electrical, plumbing and mechanical codes adopted by the City of Dallas.

- Dallas Area Rapid Transit Board

Implements the DART Service Plan to provide mobility, improve quality of life, and stimulate economic development. DART is a separate corporate entity and not a City department.

- Dallas Housing Authority (DHA) Board of Commissioners

Responsible for local policymaking, administration and planning of programs that provide, or assist others in providing an adequate supply of quality housing which meets the needs and financial abilities of low-income citizens. DHA is a separate corporate entity and not a City department.

- Senior Affairs Commission

Promotes independence, dignity and purpose through education, volunteerism, advocacy, and services.

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[9] http://citysecretary.dallascityhall.com/boards.html

- Tax Increment Financing Districts (TIF) Boards

The TIF Boards for their respective TIF districts review and provide recommendations to the City Council concerning TIF funding.

Visitability and Universal Design

The City of Dallas has incorporated FHA accessibility requirements in its Building Code and adheres to Section 504 of the Rehabilitation Act in regard to accessibility in its housing programs. Section 1107.2.11 of the City's Building Code, Multifamily Dwellings, requires that all covered multifamily dwellings contain adaptable design features including:

- an accessible route into and through the dwelling unit
- light switches, electrical outlets, thermostats, and other environmental controls in accessible locations; reinforcements in bathroom walls to allow later installation of grab bars around the toilet, tub, shower and shower seat, if provided, and usable kitchens and bathrooms that an individual in a wheelchair can maneuver about the space.

HUD's CPD Notice 05-09: *Accessibility Notice – Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act and their applicability to Housing Programs funded by HOME and CDBG*, recommends the use of the visitability concepts in addition to the requirements of Section 504 and the FHA. Visitability is defined by AARP in the *Increasing Home Access: Designing for Visitability*[10] brief as a house built to include a zero-step entrance, wide doorways with 32″ of clear passage space, and a half bathroom on the main floor. The visitability concept applies to single family and other housing types that are not covered by federal law to incorporate accessibility features.

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[10] http://assets.aarp.org/rgcenter/il/inb163_access.pdf

IV.   COMPLIANCE DATA AND ANALYSIS

Introduction

This section contains an analysis of home loan, community reinvestment and fair housing complaint data. The AI uses Community Reinvestment Act (CRA) performance ratings and Home Mortgage Disclosure Act (HMDA) data to examine fair lending practices within a jurisdiction. Data regarding fair housing complaints and cases help to further illustrate the types of fair housing impediments that may exist.

Home Mortgage Disclosure Act (HMDA)

The HMDA is implemented by the Consumer Financial Protection Bureau's Regulation C, and mandates 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 (Figures 52 -54):

- 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 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.
- 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.
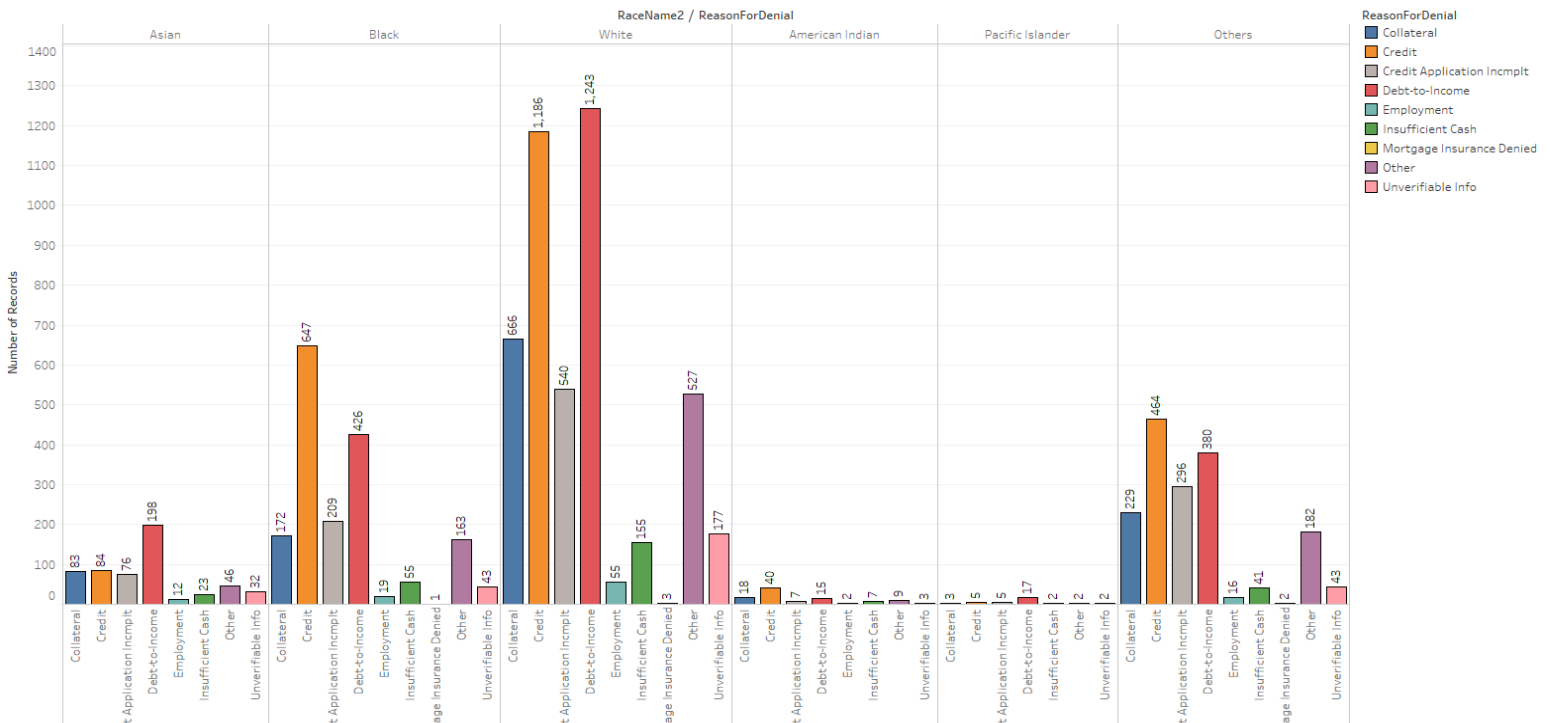
Figure 52: Denied HMDA applications with reason for denial by race, Dallas County (count)
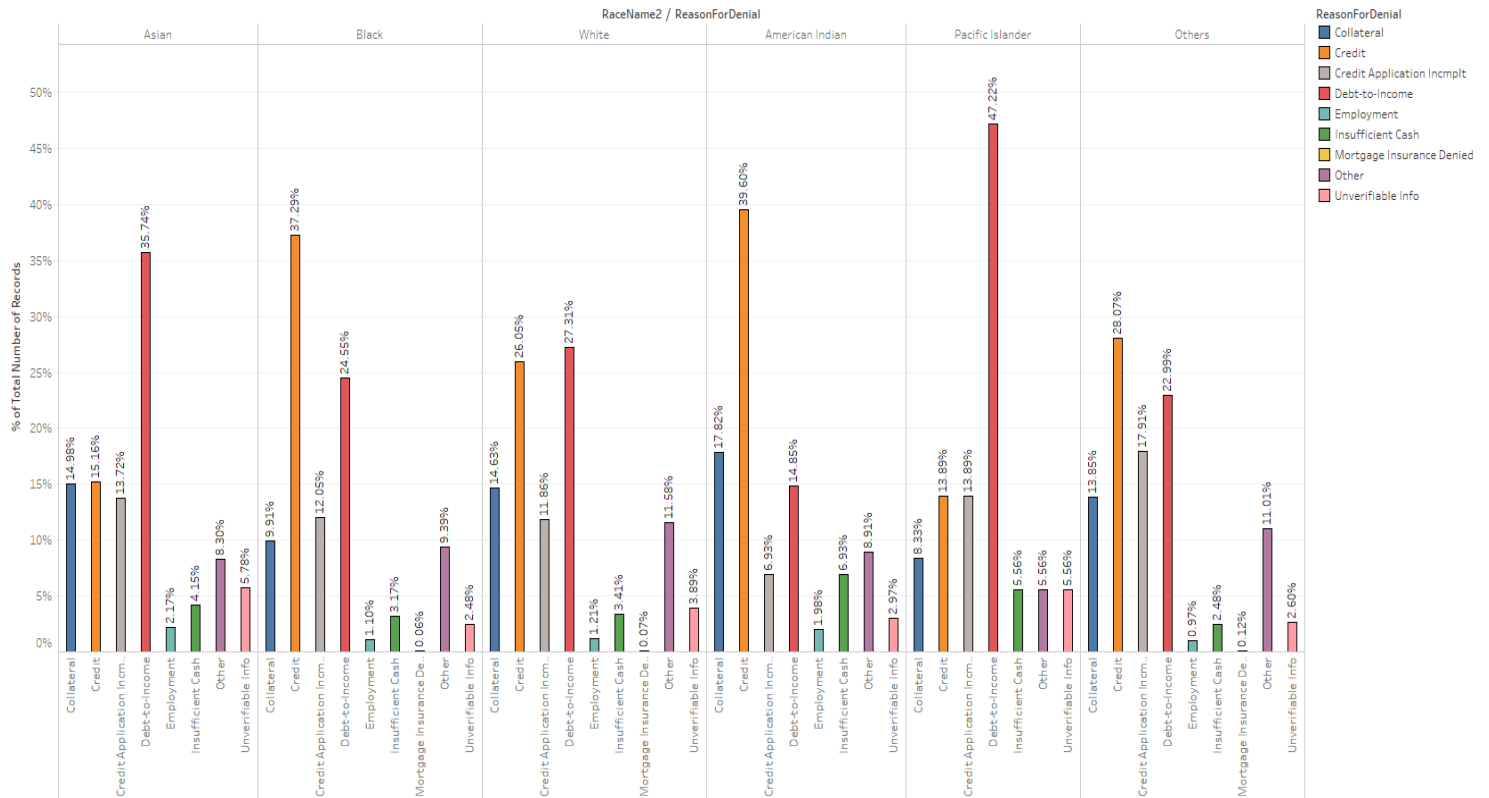
Figure 53: Denied HMDA applications with reason for denial by race, Dallas County (percent)
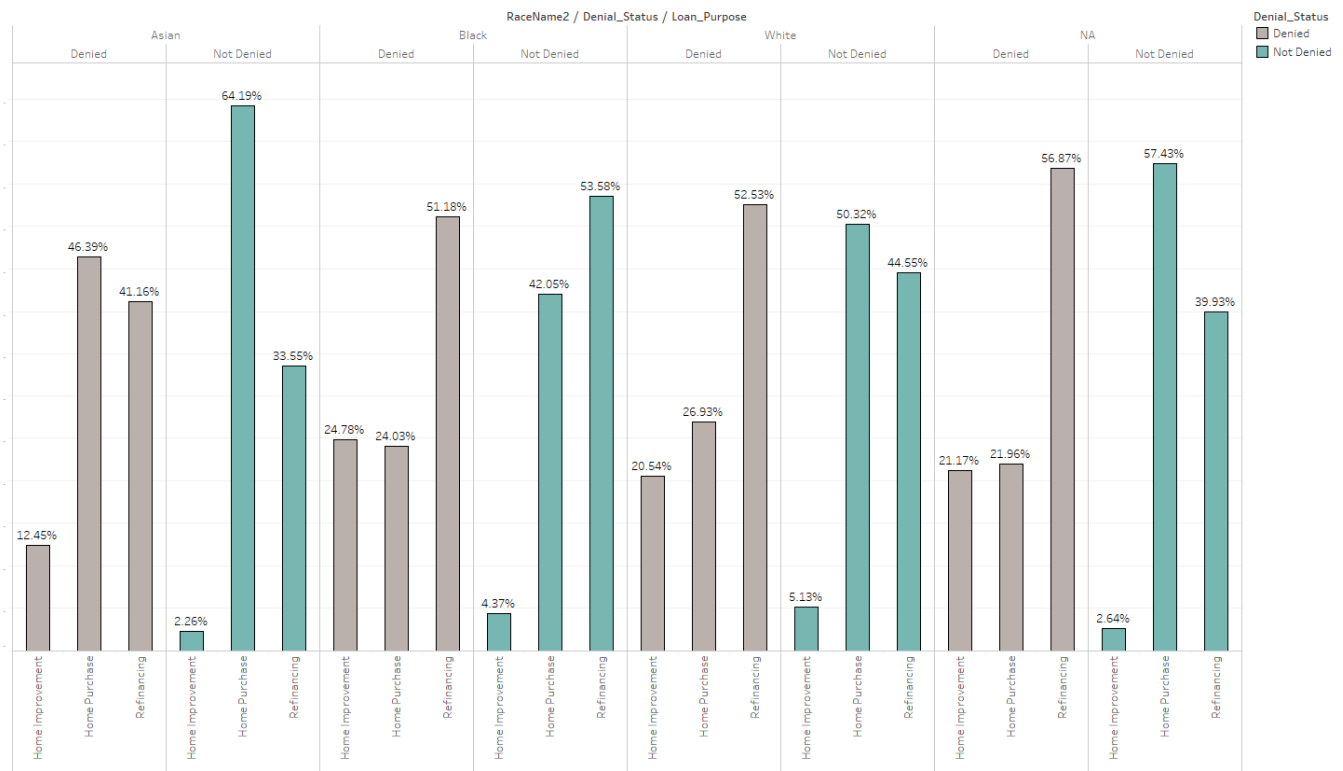
Figure 54: HMDA denial rate by loan purpose and race, Dallas County (percent)

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CRA Compliance

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 30 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.

% 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%

Table 30: CRA small business loans by census tract income, Dallas County

Figure 55 shows the distribution of CRA loans by census tracts: a darker shade means greater amount. Overall, banks grant greater amounts of loans in the northern sector than the southern sector of the city. Census tracts south of I-20 receive a greater number of loans than the southern sector (Red Bird area, southeast Oak cliff, Mountain Creek).

The map delineates R/ECAPs in pink. Overall, the R/ECAP census tracts have relatively low loan amounts; however, a few exceptions exist, notably 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
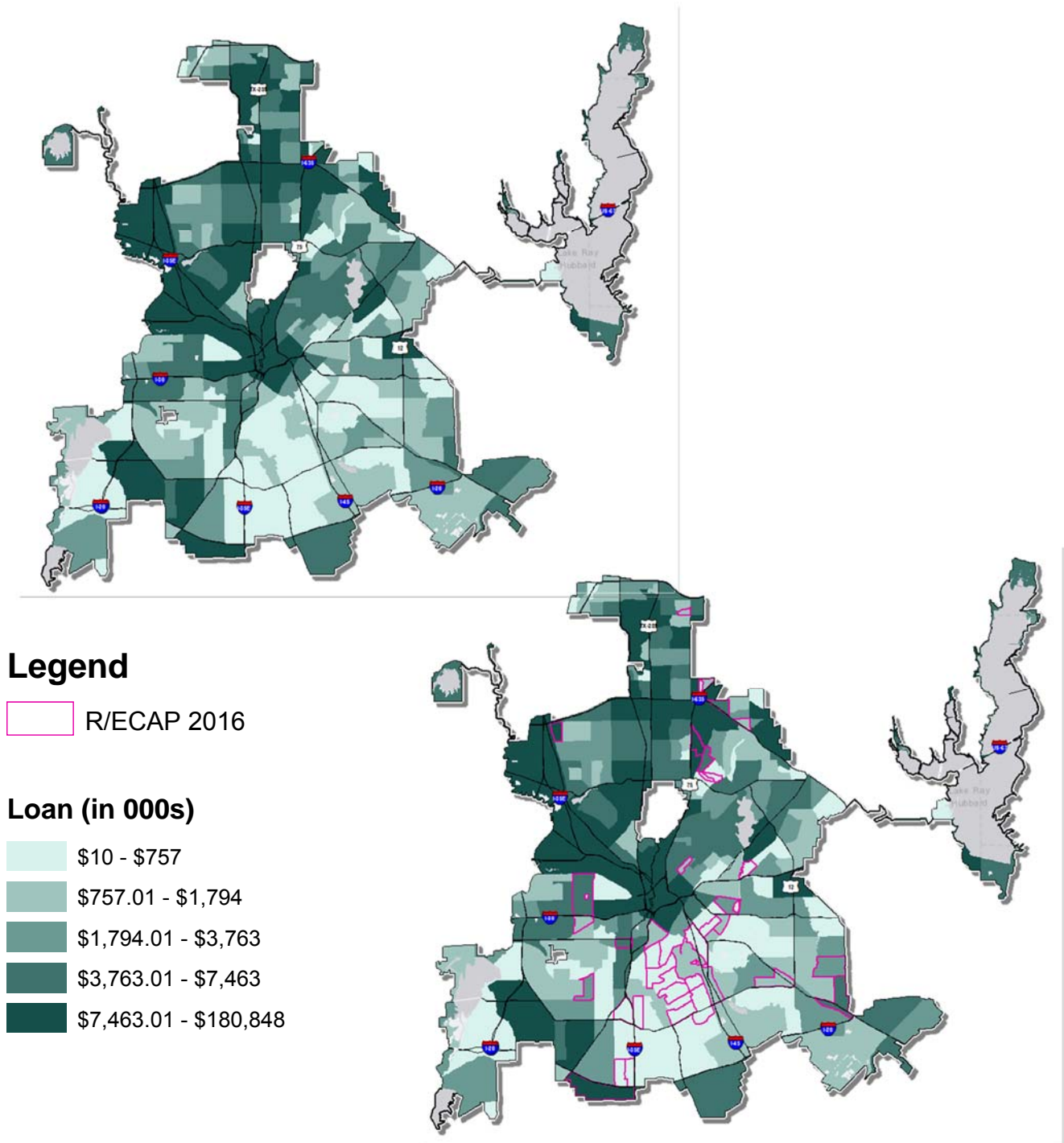
Figure 555: CRA small business loans amount by census tract overlaid with R/ECAPs, Dallas

Fair Housing Complaint Data

The City of Dallas Fair Housing Office receives discrimination complaints, investigates complaints, and provides conciliation as an option to resolve their complaint including the execution of conciliation agreements. The section of the Analysis of Impediments to Fair Housing Choice includes a review of the nature and extent of fair housing complaints filed with the City in recent years. The review of complaint data identifies trends in fair housing discrimination and can guide the direction that fair housing education and outreach actions need to take.

Filing a Complaint

To file a complaint with the City of Dallas Fair Housing Office, residents of Dallas may complete a fair housing complaint form, which is available on the City's website, or call or visit the Fair Housing Office at the following location:

Dallas Fair Housing Office
1500 Marilla St., Room 1BN
Dallas, TX 75201
(214) 670-FAIR (3247)
Fax (214) 670-0665
TTY (214) 670-6936

All complaints are investigated to determine whether a reasonable cause to determine a violation of the City's Fair Housing Ordinance exists. Complaints are dual filed with HUD's Office of Fair Housing and Equal Opportunity. If reasonable cause is established, the Dallas Fair Housing Office may continue to attempt to facilitate an agreement between the complainant and the respondent, if appropriate. The finding of cause is established by the City Attorney's office, which then passes the case to the Fair Housing Office. The Fair Housing Administrator or Assistant Director of Fair Housing may issue a charge and a lawsuit will be filed in the State District Court. However, during this period, conciliation attempts may be considered, if appropriate. The conciliation agreement, if reached, lays out provisions to protect the filer of the complaint and the public interest. If an agreement is executed, the Fair Housing Office will take no further action unless the agreement is violated. The final investigation report is submitted to the City's Attorney Office for determination.

Housing Discrimination Complaints

The analysis uses data from the City's Comprehensive Annual Performance and Evaluation Reports, which provide data for the period from FY 2013-14 to FY 2017-18.

Housing discrimination complaints were filed on the basis of race, color, religion, sex, disability, familial status, national origin, and retaliation. In some cases, complaints were filed on more than one basis. A total of 393 complaints were filed between October 2013 and September 2018. FY 2014-15 had the most complaints, with a total of 93. Just 66 complaints occurred during FY 2017-18.

As an example of the Fair Housing Office's response to these complaints, 67 total cases were closed FY 2017-18. Of these, 18 cases were conciliated for a total of $37,248.54 and one case settled for a total of $45,500.00 in monetary and valuable consideration.

Nationally, the 2017-18 Office of Fair Housing and Equal Opportunity Annual Report reported 8,196 complaints filed with HUD and Fair Housing Assistant Program agencies in FY 2017-18. The majority of those complaints were filed on the basis of disability, with race the second most frequently cited basis for complaint. Almost half of all complaints were found to have been made without cause, and a further nine percent were withdrawn. Just over one-fourth of complaints were conciliated, and about one-in-twenty were closed with a determination that the case was valid. A total of $8,907,003 in monetary relief was provided in response to fair housing cases.

Hate Crimes

Any traditional crime, such as murder, arson, or vandalism, can be classified as a hate crime if it is motivated by a bias against a race, religion, disability, ethnic origin, sexual orientation, gender, and gender identity. The gender and gender identity bias types were added in 2013 in response to the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009. Because these protected classes significantly overlap those classes protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments to Fair Housing.

Hate crimes are reported to the Federal Bureau of Investigation (FBI) by jurisdictions. Incidents are reported by number of incidents per bias motivation, and the available data was reviewed for the years 2013 to 2017. Over the five-year period examined, there were 67 hates crimes reported in the City of Dallas. Sexual orientation was the motivating bias in over 52% of the reported crimes. The table below provides the hate crime incidents by year.

Year	Race/Ethnicity	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2017	2	0	12	0	0	0	14
2016	7	2	2	0	0	0	11
2015	4	3	2	0	2	2	13
2014	4	1	10	0	0	0	15
2013	3	2	9	0	0	0	14
Total	20	8	35	0	2	2	67

Table 31: Number of hate crime incidents per bias

Legal Cases

As part of the fair housing analysis, recent legal cases were reviewed to determine significant fair housing issues in the City of Dallas. The purpose of the case analysis is to understand fair housing issues and challenges and to identify possible impediments or barriers to fair housing choice in the region. Information was gathered from court documents and rulings, newspaper articles, and press announcements. The review provides a summary of the case highlights as it relates to fair housing.

Disparate Impact under the Fair Housing Act

Subpart G 100.500 (a) of the February 15, 2013 fair housing regulations define discriminatory effect as follows: A practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of persons or creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin.

HUD explains that the February 15, 2013 Fair Housing Act's Discriminatory Standard Rule formalizes the longstanding interpretation of the Fair Housing Act to include liability for discriminatory effects and establishes a uniform standard of liability for facially neutral practices that have a discriminatory effect. It adds that under this rule liability is determined by a "burden-shifting" approach. The charging party or plaintiff in an adjudication first must bear the burden of proving its prima facie case of either disparate impact or perpetuation of segregation, after which the burden shift to the defendant or respondent to prove that the challenged practice is necessary to achieve one or more of the defendant's or respondent's substantial, legitimate, nondiscriminatory interests. If the defendant or respondent satisfies its burden, the charging party or plaintiff may still establish liability by demonstrating that this substantial legitimate, nondiscriminatory interest could be served by a practice that has a less discriminatory effect.

Subpart B Section 100.70 (d) adds subsection (5) as other prohibited conduct under discriminatory housing practices – enacting or implementing land-use rules, ordinances, policies, or procedures that restrict or deny housing opportunities or otherwise make unavailable or deny dwelling to persons because of race, color, religion, sex handicap, familiar status, or national origin.

Texas Department of Housing and Community Affairs v. Inclusive Communities Project

In 2015, the U.S. Supreme Court ruled on Texas Department of Housing and Community Affairs v. Inclusive Communities Project, affirming that disparate impact claims are cognizable under the FHA. The TDCHA v. ICP case had been an ongoing case since 2008, and a summary follows:

ICP filed suit against the TDHCA claiming that the state housing agency intentionally discriminated based on race and that the TDHCA's administration of Low-Income Housing Tax Credit (LIHTC) Program had a disparate racial impact thus violating the Fair Housing Act (FHA). Specifically, ICP alleged that TDHCA disproportionately approved LIHTC allocations in predominantly minority neighborhoods and disproportionately denied LIHTC projects in predominantly non-white neighborhoods.

On Mach 20, 2012, the district court found that TDHCA, while not intentionally discriminating against minorities, had funding processes and guidelines that had a disparate impact by having the effect of providing LIHTC to projects that were primarily located in high minority areas.

The court ordered that TDHCA submit a remedial plan to remedy the FHA violation and to prevent future violations. The Court adopted the remedial plan on August 7, 2012 along with a requirement for annual reporting to ensure that the new application scoring guidelines outlined in the remedial plan would have the effect of not causing any further violations of the FHA and remove any effects from the past discrimination.

TDHCA appealed to the U.S. Fifth Circuit Court of Appeals. During the appeal, HUD issued new regulations that established standards for proving disparate-impact claims under the FHA – "Implementation of the Fair Housing Act's Discriminatory Effects Standards." The Fifth Circuit reversed the district court's decision and remanded the case to evaluate disparate impact under the new regulations. TDHCA requested that the U.S. Supreme Court review the decision. The issues presented are:

1) Are disparate-impact claims cognizable under the FHA? and,
2) If disparate-impact claims are cognizable under the FHA, what are the standards and burdens of proof that should apply? [11]

The case was heard by the Supreme Court on January 21, 2015, and the Court's amicus brief states that "when government officials use "mechanisms [that] are race conscious but do not lead to different treatment based on a classification," it is unlikely those mechanisms "would demand strict scrutiny to be found permissible." Parents Involved in Cmty. Schs., 551 U.S. at 789 (concurring in part and concurring in the judgment). The FHA's disparate-impact prohibition fits comfortably within the history of statutory prohibitions on disparate-impact discrimination long recognized by this Court."

This decision held that disparate-impact claims are, in fact, cognizable under the FHA, and directly serve the FHA's anti-discrimination intent.

The TDCHA v. ICP case was the third time this matter is going before the Supreme Court with two earlier cases being Mt. Holly Gardens Citizens in Action, Inc. vs. Township of Mount Holly, 658 F.3d 375 (3d Cir. 2011), cert. granted, 133 S. Ct. 2824, 186 L. Ed. 2d 883 (2013) and Magner v. Gallagher, 619 F.3d 823 (8th Cir. 2010), cert. granted, 132 S. Ct. 1306 (2012). Both the Mount Holly and Magner v. Gallagher cases were settled after the completion of briefing but before the Supreme Court could hear oral argument and answer the question presented.

National Fair Housing Alliance v. Bank of America Corporation

In 2018, the National Fair Housing Alliance (NFHA) and several of its member organizations filed a federal Fair Housing Act lawsuit against Bank of America.

The lawsuit alleges that BOA has violated the FHA as it " intentionally failed to provide routine exterior maintenance and marketing at Bank of America-owned homes in working- and middle-class African American and Latino neighborhoods in 37 metropolitan areas, while they consistently maintained similar bank-owned homes in comparable white neighborhoods" (National Fair Housing Alliance, 2018). Dallas is among the 37 metropolitan areas in question.

HUD v. Wells Fargo Bank N.A., et al

NFHA filed a similar complaint as noted above, against Wells Fargo in April 2012. This complaint alleged an investigation of 19 metropolitan areas including Dallas and claimed Wells Fargo to have "harmed existing homeowners in predominantly minority communities, individuals who successfully purchases Wells Fargo's REO properties, prospective purchasers who are interested in purchasing REO properties, NFHA and its Operating Members, and others."

NFHA and Wells Fargo entered into a Conciliation Agreement that became effective in June 2013. According to the Conciliation Agreement, Wells Fargo denied differential treatment but agreed to the settlement to avoid further litigation. Wells Fargo agreed to modify its REO maintenance and marketing standards, utilize NFHA as a consultant to assist in the monitoring of maintenance and marketing of REO properties, sponsor conferences for industry and non-profit participants to provide education on fair housing issues, REO, short sales, and other areas, and provide $250,000 to NFHA and its partners to hold seminars on foreclosures and REOs in certain communities.

Wells Fargo also had to provide $27 million to NFHA and its partners to provide programs and services to promote homeownership, rehabilitation, and development in predominantly minority communities in the 19 metropolitan areas identified in the complaint. The fair housing organization in Dallas that is party to the Agreement is the North Texas Fair Housing Center (NTFHC).

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[11] Petition of Writ of Certiorari filed by TDCHA (May 13, 2014)

<u>1600 Pacific Building LP v. City of Dallas (Case No.: 06-10-0449-4, -6, -8, -9)</u>

In 2007, 1600 Pacific Building LP (Claimant) received an award of $16 million (TIF funding) to develop a vacant office building in downtown Dallas into housing. One of the conditions for the City's funds was that 20% of the housing units be affordable. Claimant was unable to start construction and the agreement lapsed. Thereafter, the Claimant approached the City with new development ideas for the building and seeking considerably more financial assistance from the City and others. The Claimant presented various proposals including the addition of additional stories onto the vacant building and creating small apartments. The Claimant proposed that a majority of the housing units be affordable. In June 2009, the Claimant presented its proposal to the TIF Board and the City Council Housing Committee. Both declined to support Claimant's request for funding. Among the many reason for not supporting the project with public monies were the following:

1. The project was in bankruptcy and the project's lender was seeking to foreclose on the property because of nonpayment for at least a year. The project had failed to pay property taxes for two years totaling $263,000 and was being sued by the county to foreclose its tax lien. The project had failed to pay its insurance premiums and was being sued by a utility provider for $66,000 for nonpayment. The landlord on a ground lease with a related entity for the adjacent garage, a key component of the project, was suing to terminate the lease in part because of nonpayment. The developers had failed to keep the building in compliance with code requirements and had no plan to address any of these issues.

2. The Claimant sought more than $70 million in TIF support (which are City funds not federal funds), which would have committed 85% of the then available TIF funds from the TIF district where the project was located and which was four to five times more than any other housing project seeking TIF support.

3. To maximize its return, the Claimant proposed adding five stories onto the vacant building and then squeezing a large number of tiny apartments into the building, some as small as 375 square feet. No other City-supported renovation project had ever such small units or so many small units or found it necessary to take this approach. Despite the request, the Claimant did not produce evidence that the addition was structurally feasible.

4. The Claimant sought to use public financing (federal, state, and local) in excess of $112 million, without contributing any of their own capital or equity, to build a structure with a projected completed value of ranging from $37 million to $48 million.

5. Before the DC-TIF Board, the Claimant asserted they would secure other public financing (i.e. LIHTCs, grants), but had taken no action or spent any money to secure it and the project did not qualify for significant portions of the other proposed public funding even if the developers had attempted to seek it.

6. The developers had never completed any project anywhere.

Approximately eight (8) months after the City declined to provide funding, the Claimant submitted an administrative complaint to HUD. The Claimant alleged that the funding was denied because it included affordable housing. The Claimant also made vague and broad allegations against the City's housing policies and the City's support of other projects with affordable housing. The City responded and provided information and documents to HUD. The City was not contacted by HUD for approximately three years.

On November 22, 2013, HUD issued a Letter of Findings of Non-Compliance with fair housing and civil rights laws based on the allegations of Claimant. The City promptly filed a request for review with supporting evidence that demonstrated the falseness of the Claimant's allegations and the incorrectness of factual statement and findings in the Letter of Non-Compliance. The City and HUD began discussions concerning the Letter and the Claimant's allegations.

In November 5, 2014, the City entered into a Voluntary Compliance Agreement (VCA) with HUD. HUD agreed that all issues and findings in the Letter of Non-Compliance were superseded by the VCA. HUD acknowledged

that some of its findings in the Letter were incorrect. There were no findings or relief for the Claimant. The primary terms of the VCA were that the City would

1) Continue to develop its Housing Plus Plan.
2) Present City Council with an ordinance that prohibits discrimination based on source of income.
3) Work with area governments in attempt to develop a 10-year regional housing, and
4) Convene a symposium to discuss regional planning activities for fair housing.

The Claimant dismissed its remaining claims in its administrative HUD complaint on or before the VCA was signed.

U.S. ex rel. Lockey, et. al v, City of Dallas, et al.

The individuals involved in the 1600 Pacific Building HUD complaint also filed a False Claims Act case in federal district court against the City and DHA. They repeated and relied on the allegations in HUD administrative proceeding to claim that the City had falsely certified that it was affirmatively furthering fair housing and falsely certified it was complying with other required federal civil rights obligations. The federal district court granted the City's and DHA's motions to dismiss. The plaintiffs appealed. The Fifth Circuit affirmed the district court's decision. The plaintiff attempted to amend their pleadings after the mandate was issued. The district court denied their request. Plaintiff then brought a new, very similar claim forward. This was again dismissed by both the district and appellate courts.

Complaints filed against developers for housing discrimination based on disability

Section U.S.C 3604 (f)(3)(C) and (f)(7) of the Fair Housing Act defines discrimination as a failure to design and construct covered multi-family housing (building of four or more units) for first occupancy after March 13, 1991 in a manner that allows those buildings to be readily accessible and useable for persons with disabilities. Accessibility and use include items such as wider doors and passages for wheelchairs, and adaptive design features such as accessible ingress and egress, accessible switches and outlets, reinforced bathroom walls for later grab bar installation, and usable kitchen and bathroom spaces for wheelchair maneuverability.

The provisions of the Act cover a wide range of residential housing including, but not limited to, apartments, condominiums, singe room occupancy units, public housing, extended stay and residential hotels, nursing homes, dorms, shelters, and other units funded through federal block grant funds. Redevelopment of an existing property to add public and common areas or four or more units is considered a new building and subject to the provisions. Per U.S.C 3604 (f) (7), for buildings that meet the criteria of four or more units and have at least one elevator, all units are subject to the provisions. For covered buildings without an elevator, only the ground floors and common use areas are subject to the provisions. While single-family detached units are not typically subject to the provisions, those that are funded with federal block grant funds may be subject to the provisions. In addition to provisions in the FHA, the following requirements apply to accessibility of residential units:

- The Architectural Barriers Act (ABA) Standards – applies to facilities designed,
- Section 504 of the Rehabilitation Act of 1973 – applies to residential units designed, built, altered, or leased with federal funds
- Uniform Federal Accessibility Standards (UFAS) or a stricter standard (41 CFR Ch. 101, Appendix A) – applies to new constructed housing with five or more units in which 5% or at least one unit, whichever is greater, must be accessible for persons with mobility disabilities. Also, 2% of the units or at least one unit, whichever is greater, must be accessible for persons with visual or hearing disabilities.

The following cases are examples of alleged housing discrimination on the basis of disability in the City of Dallas.

NFHA and North Texas Fair Housing Center v. UDR, Inc. (Case No.: 3.2012cv03641)

Filed in September 2012, the case brought against UDR, Inc. a real estate investment trust, by the NFHA and NTFHC, involved three multi-family developments owned by UDR in the Dallas area – the Savoye, the Belmont, and the Riachi. The lawsuit alleged that UDR and its affiliates discriminated against persons with disabilities by designing and/constructing multi-family dwellings and common areas without the FHA required accessibility features. The case was settled in June 2013, and UDR agreed to renovate the three developments and pay $87,000. UDR also agreed to build all new apartments that meet the accessible design and construction requirements. UDR was also required to provide education on fair housing rights to its tenants and training to its staff.

<u>NFHA and North Texas Fair Housing Center v. BBL Builders L.P.</u>
The NFHA and NTFHC filed a federal complaint against BBL Builders L.P. and the owners of nine Texas apartment complexes for discriminating against persons with disabilities. The lawsuit filed in October 2013, alleged that the apartments designed/constructed by BBL Builders L.P. did not meet the accessibility requirements of the FHA, specifically because "there was insufficient space to navigate bathrooms and kitchens in a wheelchair and narrow and steep routes through the property, among other violations."

Other discrimination

On January 8, 2014, "a district court entered a consent decree in United States v. Stonebridge (N.D. Tex), a Fair Housing Act pattern or practice case against the owners and operators of Stonebridge Apartments, a 184-unit complex outside of Dallas. The complaint, which was filed on April 5, 2013, alleged that the defendants denied apartments to persons of Middle Eastern and South Asian descent, misrepresented apartment availability on the basis of race and national origin, and segregated those persons who were not denied into designated buildings. The consent decree requires training of staff, the adoption of fair housing policies, termination of the apartment manager, $210,000 in damages and $107,000 in civil penalties" (United States Department of Justice, 2019).

Foreclosure Data

For analysis of foreclosure impacts in Dallas, data was gathered from RealtyTrac.com. RealtyTrac is recognized as the most comprehensive, one-stop source of foreclosure data. The RealtyTrac data management system was utilized to gather the figures and charts cited herein, including homes in pre-foreclosure, at auction, and bank owned (REO) properties. The information from RealtyTrac represents the most recent data available as of Spring 2019.

According to RealtyTrac, one out of every 3,526 homes in Dallas was under foreclosure in April 2019. RealtyTrac further analyzes foreclosures according to zip code within the city of Dallas. In March 2014, the zip codes with the highest number of foreclosures were as follows:

- *75249*- 1 in 1268 homes
- *75216*- 1 in 1277 homes
- *75210*- 1 in 1630 homes
- *75241*- 1 in 1651 homes
- *75224*- 1 in 1969

RealtyTrac provides a geographical comparison of foreclosures within the city, county, and state, as well as on the national level. The City of Dallas rate of foreclosure (0.02%) is the lowest of the four geographic levels, and it is half the national foreclosure rate (Figure 56).
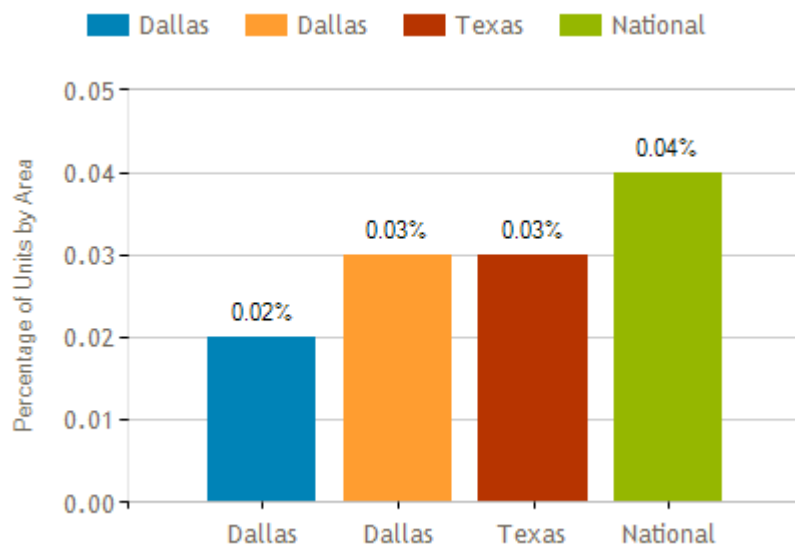
Figure 566: Percent of units in foreclosure by geographic level, with City of Dallas far left

On average, just over 100 foreclosures per month in Dallas from Spring 2018 to Spring 2019 occurred (Figure 57). February of 2019 had the most foreclosures of any individual month, while January of that same year actually had the fewest foreclosures. Foreclosures appear to have gone down considerably recently, especially in comparison to the recession of the late-2000s. The change in delinquent mortgages over time also showed clear Improvement (Figure 58). While delinquency in Dallas County was slightly higher in 2018 than it was throughout the country as a whole, it was far lower than the previous ten years (National Mortgage Database, 2018).
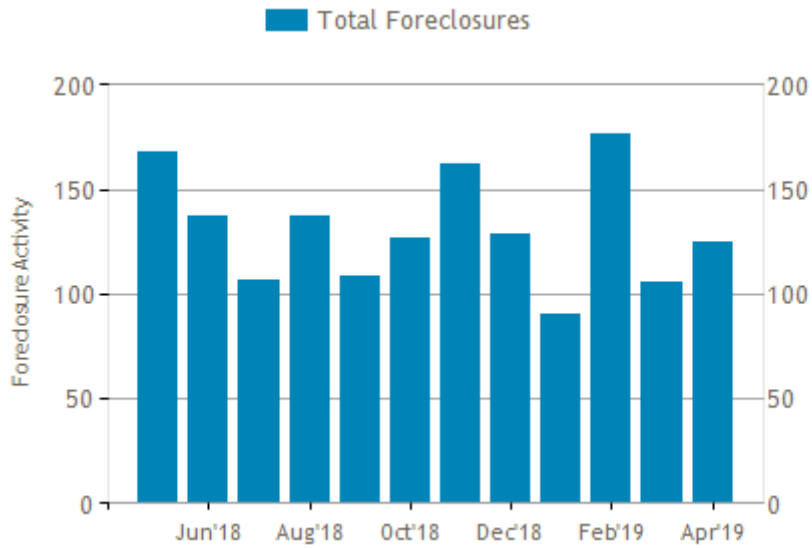
Figure 577: Number of foreclosures per month for Dallas between Spring of 2018 and Spring of 2019

Percentage of mortgages 30–89 days delinquent:
Dallas County, TX versus **national average**, January 2008–
September 2018
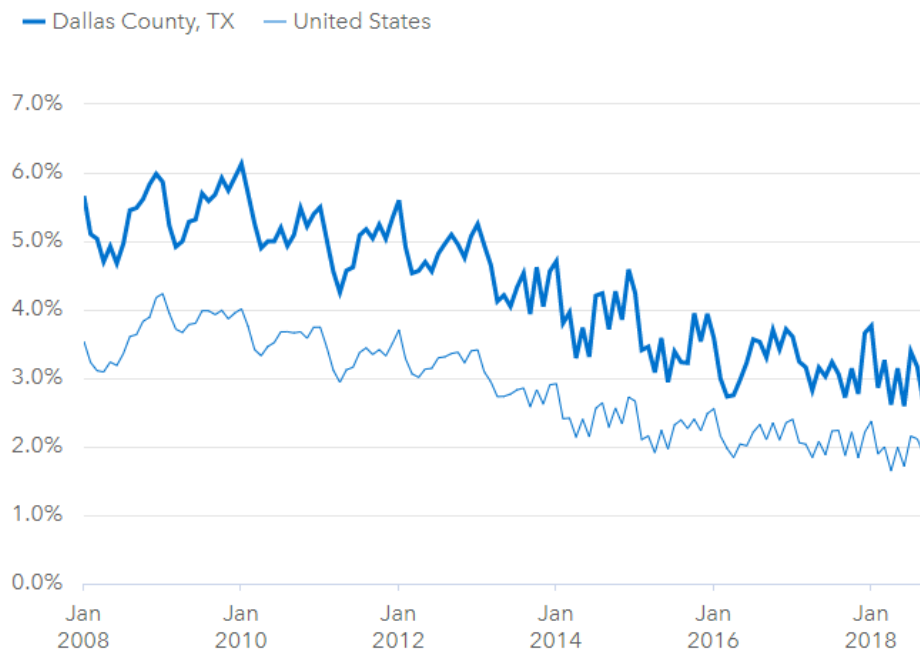
Figure 588: Mortgage delinquency rate in Dallas between 2008 and 2018

Through its role as fiscal sponsor for the TFPTF, the Texas State Affordable Housing Corporation (TSAHC) administered federal National Foreclosure Mitigation Counseling (NFMC) funding on behalf of the state of Texas. The program served more than two million homeowners nationwide but was ended in 2018. Local coalitions like the Dallas–Fort Worth Home Ownership Preservation Enterprise (DFW HOPE) continue to host events to raise awareness of alternatives to foreclosure.

V.   PUBLIC OUTREACH

Overall Strategies for Public Participation in the AI

As part of the Consolidated Plan requirements at 24 CFR 91.105(a)(2)(i) and in accordance with its Citizen Participation Plan, 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.

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.

Table 32 shows the key tools utilized throughout the process, as well as their intended 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

Table 32: Public participation tools, goals and target groups

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 (Figure 59).

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.
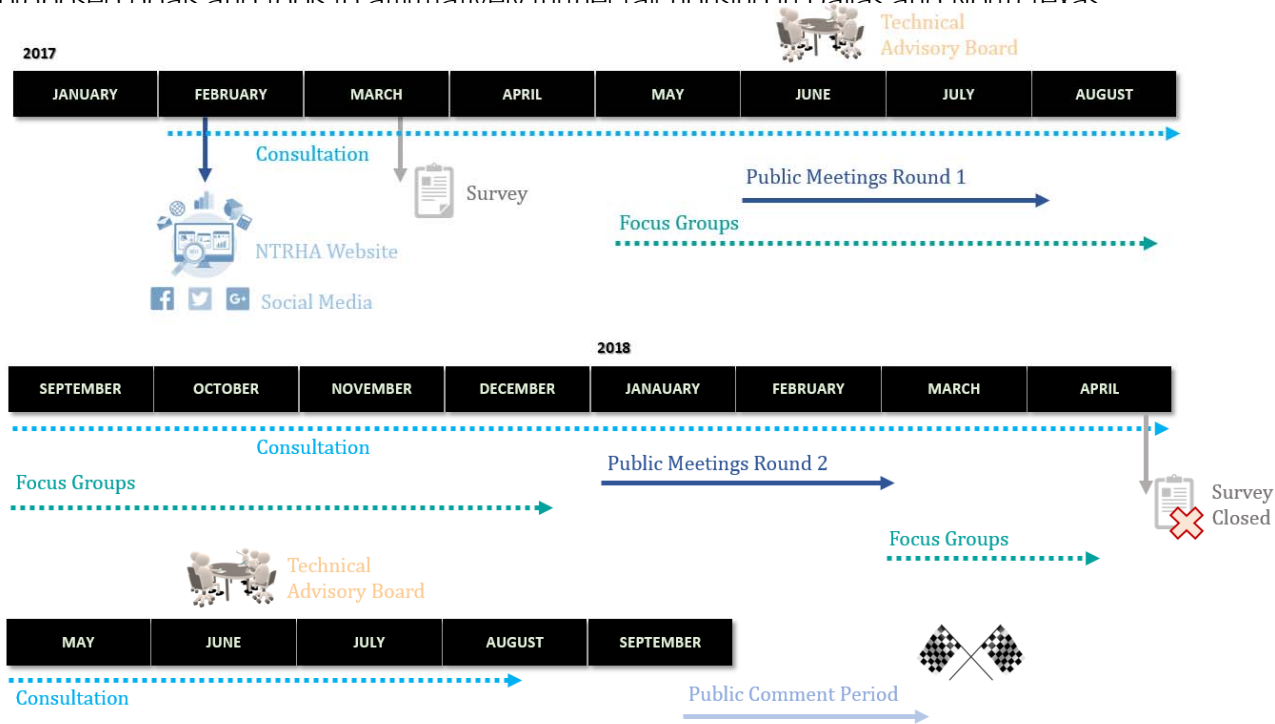
Figure 59: Public participation structure and timeline

In parallel, a **survey** was 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.

Web/Social Media Presence

Continuous public engagement began with the development of the **NTRHA website** (www.northtexasrha.com) in mid-February 2017 (Figure 60). 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.
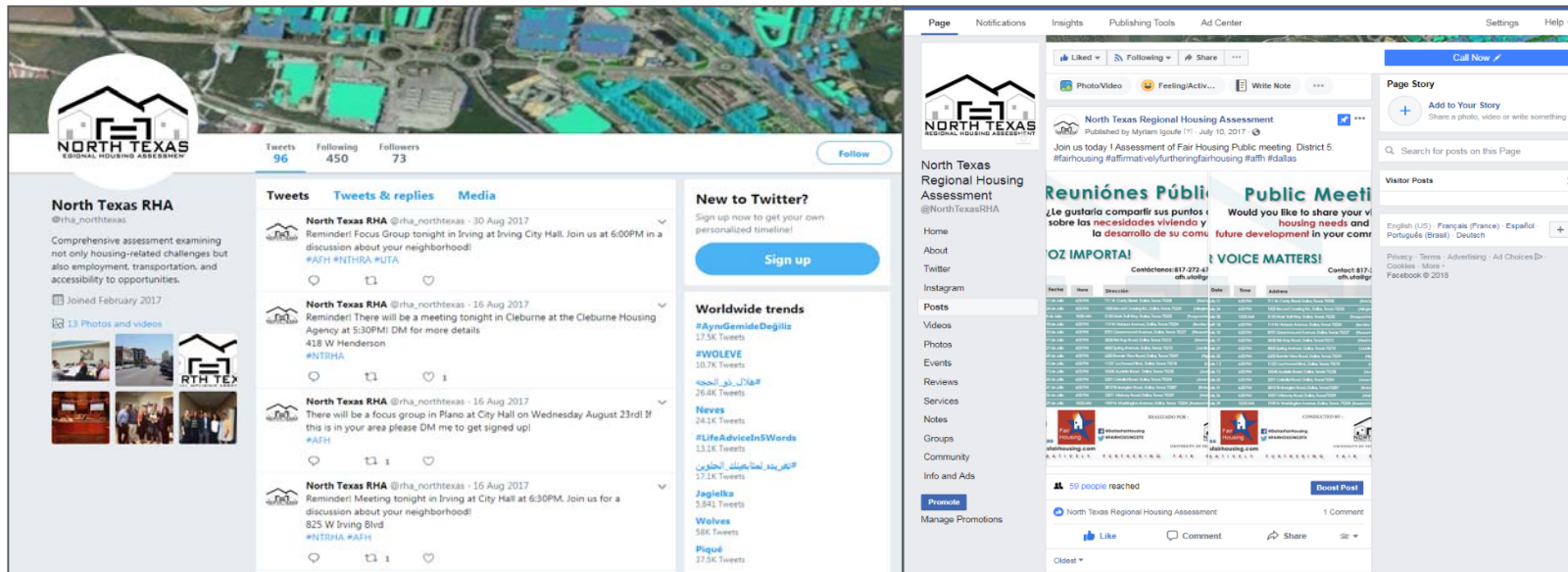
Figure 60: NTRHA Website

NTRHA launched a Facebook page and a Twitter account (Figure 61) 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.
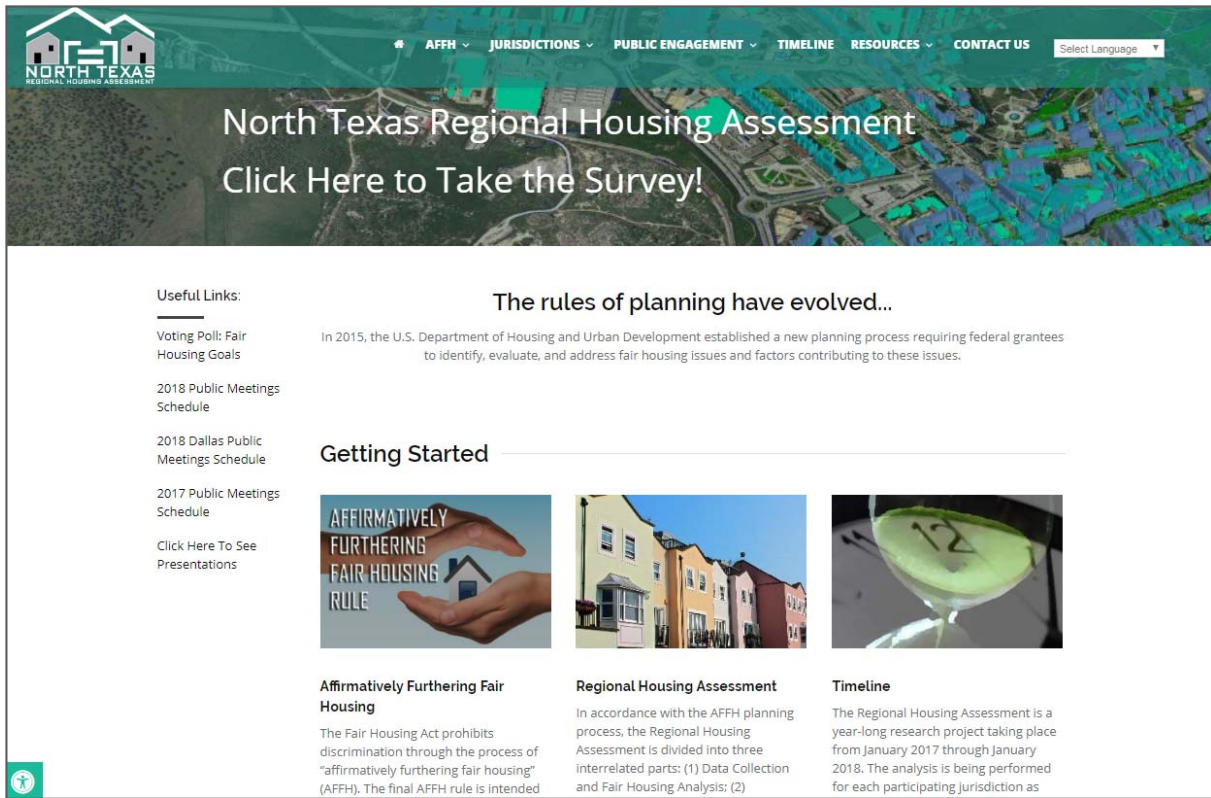
Figure 61: NTRHA social media platforms

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 63).

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.

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 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). Figure 62 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 62: NTRHA public meetings flyer

Public meetings 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

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 (Figure 63)
- 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

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

Figure 64: Focus group flyer

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.

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.

Dallas-specific 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.

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 33 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.

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

Table 33: Technical advisory board members

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 of 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.

Summary of Comments

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
  - Sidewalks, crosswalks, crossing signals inaccessible and bar access to transit stops

- Lack of affordable, accessible housing in a range of sizes
    - Lack of housing that allows persons with disabilities to live together with their families in the community
    - Emergency shelters lack sufficient, accessible facilities that allow families to stay together
    - 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)
    - LIHTC properties are not being built with enough accessible units
    - Group homes require residents to share bedrooms (no privacy), and many rooms are not big enough for persons with wheelchairs and other adaptive equipment
    - 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
    - Even with a "gifted" home, persons with disabilities unable to afford property taxes and maintenance
- Lack of assistance for housing accessibility modifications
    - People don't know how to go about requesting modifications
    - Waiting list to get a ramp built by a nonprofit is one year
- Access to publicly supported housing for persons with disabilities
    - Assisted living facilities have rules that prevent family members from living with persons with disabilities for support
    - Very difficult to get into housing programs
    - Funding cuts keep supply below the need
    - When housing subsidy becomes available (voucher), there are no accessible units located near services or adjacent to public transit
    - 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
    - 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
    - Need more post-secondary schools, programs that provide job training for persons with disabilities, including intellectual and developmental disabilities (IDD)
    - Need more supportive services on campuses for persons with disabilities
    - 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
    - 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
    - Don't want to have to live in a nursing home when I can be independent just because I can't find affordable housing
    - 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
    - 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
    - Parking spaces at City Hall and other public facilities don't fit a seven-foot van ramp – have to use two parking spaces
    - 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, DHA 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%).

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

Table 34: Survey Results: Greatest Housing Need
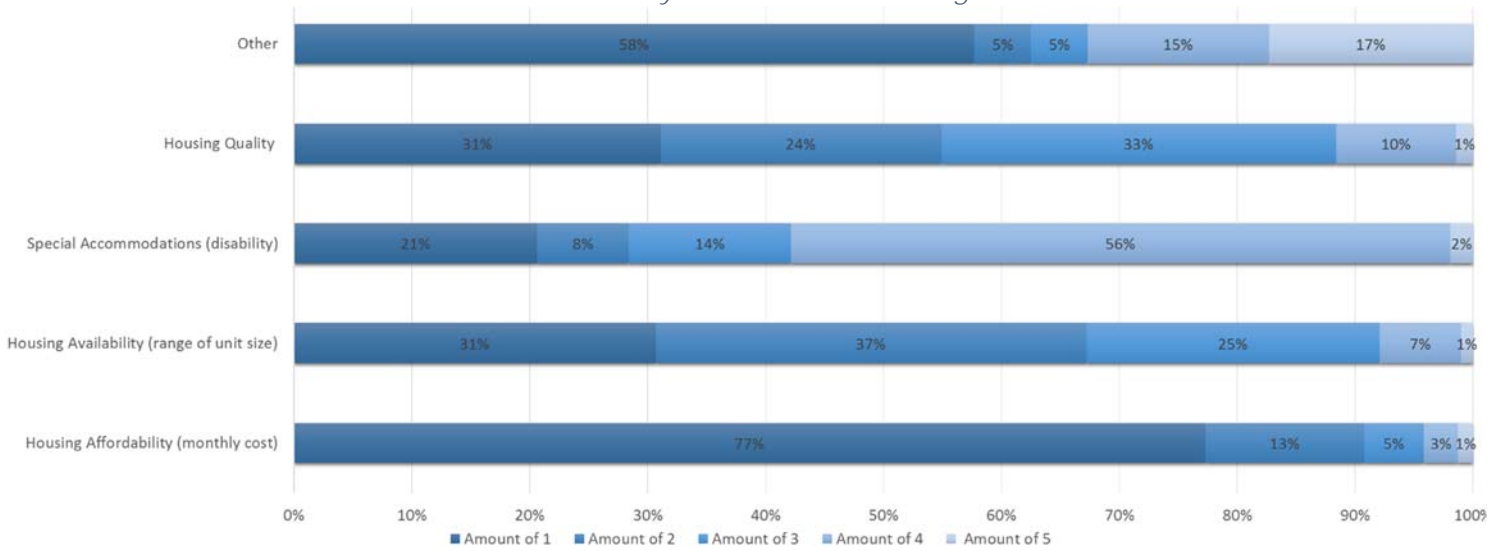
Figure 65: Greatest housing need ranking results

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?
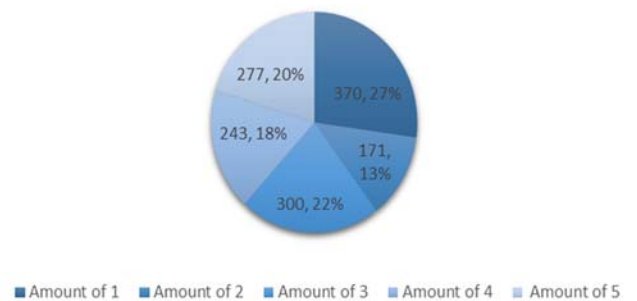
Figure 665: Housing situation satisfaction survey results

145

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.

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

Table 35: Transportation greatest need survey results
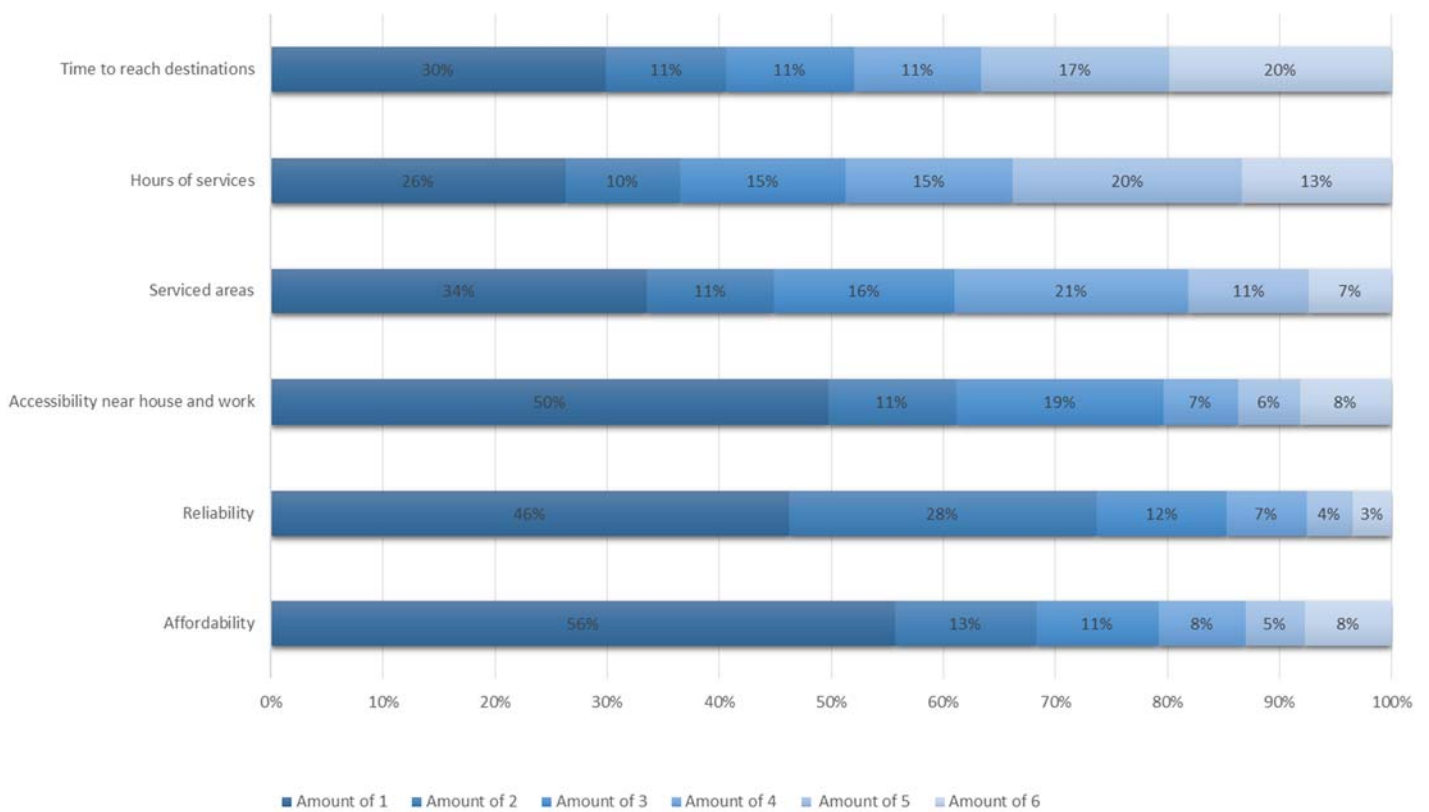
Figure 67: Transportation characteristics ranking results

The figure below 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. Respondents were also 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 69.
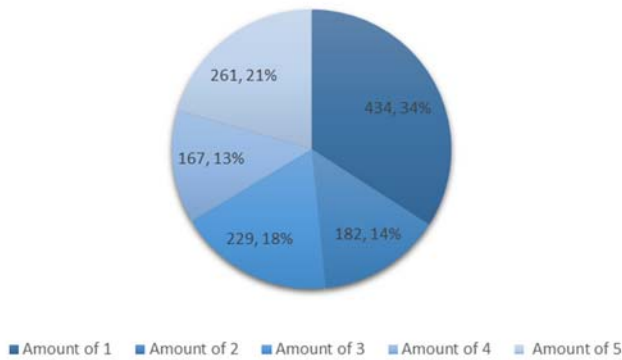
Figure 687: Transportation situation satisfaction survey results

Respondents ranked 6 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).

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

Table 36: Top neighborhood characteristics survey results

Among neighborhood characteristics, safety easily 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 that received a large number of votes include 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%).

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. The demographic characteristics of those respondents are as follows:

- Female (87%)
- Hispanic (74%)
- Black (86%)
- Single (73%)

- Have a college degree (12%)
- Employed (44%)
- Annual incomes less than $35k per year (91%)
- Own their home (92%)
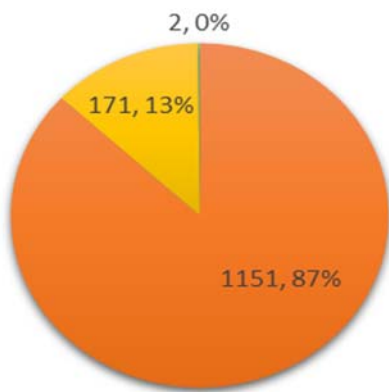
What is your gender?

What is your race/ethnicity?
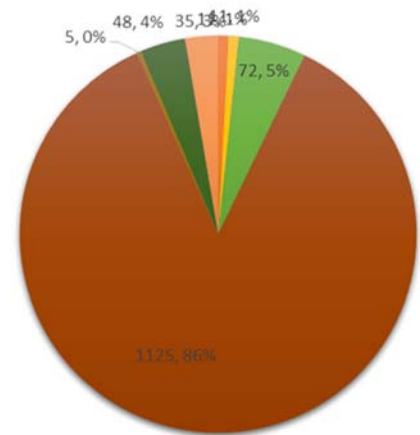
What is your marital status?
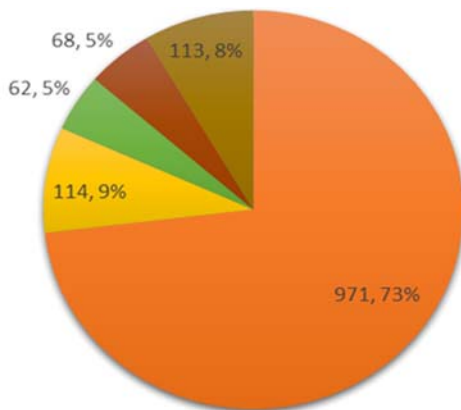
Are you Hispanic, Latino and/or of Spanish origin?
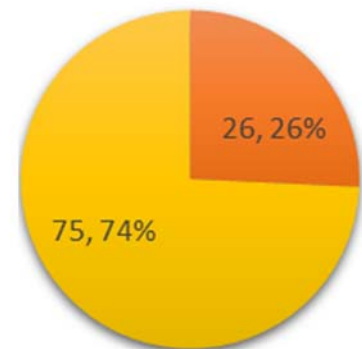
Figure 69: Respondent characteristics 1

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What is the highest level of school you have completed or highest degree you have received?

Legend:
- Less than high school degree
- High school degree or equivalent
- Some college but no degree
- Associate Degree
- Bachelor degree
- Graduate degree

Values: 68, 5% · 73, 6% · 73, 6% · 185, 14% · 419, 32% · 491, 37%
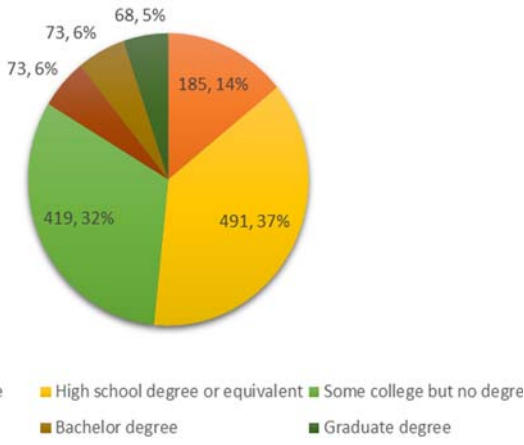
What was your total household income before taxes during the past 12 months?

Legend:
- Less than 20000
- 20000 to 34999
- 35000 to 49999
- 50000 to 74999
- 75000 to 99999
- 100000 to 149999
- 150000 to 199999
- 200000 or more

Values: 38, 3% · 40, 3% · 16, 1% · 8, 1% · 7, 1% · 6, 0% · 228, 19% · 872, 72%
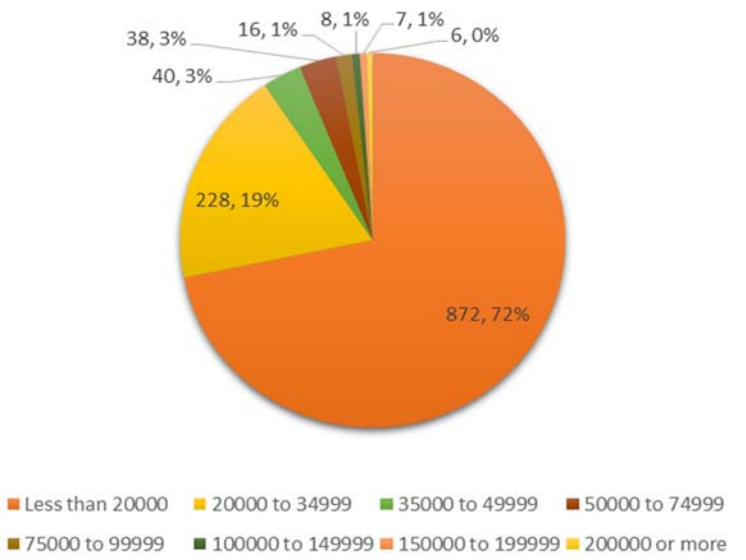
Which of the following categories best describes your employment status?

Legend:
- Employed part time
- Employed full time
- Not employed-looking for work
- Not employed-not looking for work
- Student
- Retired
- Self-employed
- Disabled

Values: 250, 19% · 325, 25% · 223, 17% · 62, 5% · 31, 2% · 88, 7% · 36, 3% · 283, 22%

Do you own a car?

Legend:
- Yes
- No

Values: 616, 50% · 610, 50%
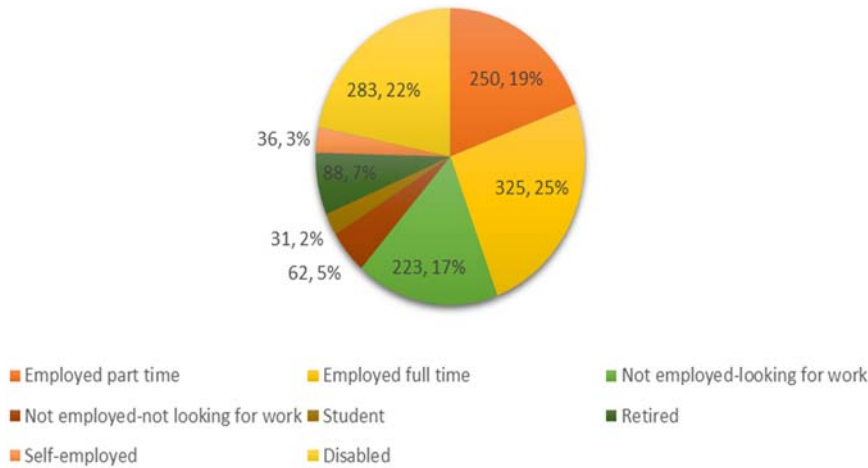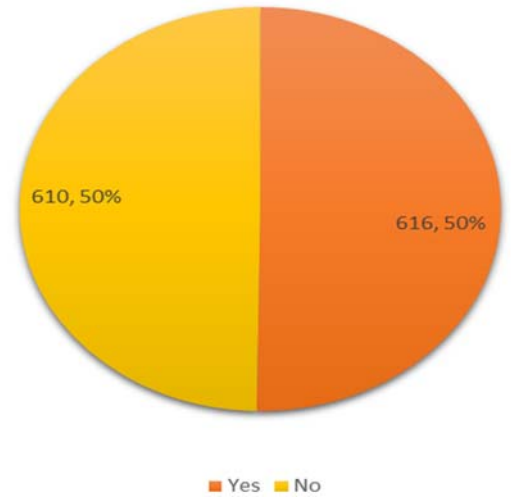
Figure 70: Respondent characteristics 2

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What type of community do you live in?
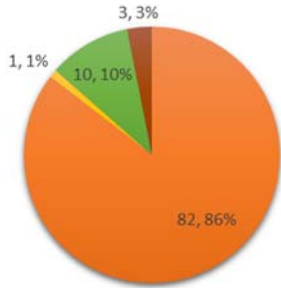
- City or urban community
- Rural community
- Surburban community
- Other

Do you live in a single-family home or in an apartment?
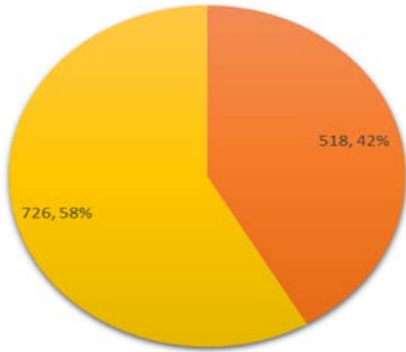
- Single Family Home
- Apartment

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

- Rent
- Own

Do you, someone in your household, or someone you provide care for experience any of the following?

- 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?

- 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

Figure 71: Respondent household information

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

How informed are you about fair housing?

Pie chart values: 42, 20%; 40, 19%; 32, 15%; 25, 12%; 39, 19%; 32, 15%
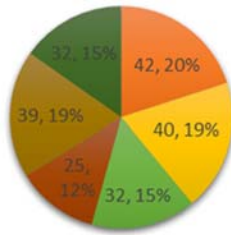
- An agent refusing to sell, rent, or show available housing
- A person being shown mostly housing in areas or neighborhoods of minority concentration
- A landlord providing different housing services or enforcing different rules for minority tenants
- A prospective tenatn being told the dwellin is not appropriate for a family
- A person being denied a loan or getting a higher interest rate because of being a member of a certain
- A person being denied a loan or getting a different interest rate because buying in a minority neighborl

Pie chart values: 31, 23%; 31, 23%; 72, 54%

- Very informed
- Somewhat informed
- Not informed

If you have experienced housing discrimination, what do you believe was the basis for the discrimination that you experienced?

Pie chart values: 30, 22%; 9, 7%; 2, 1%; 8, 6%; 3, 2%; 14, 10%; 3, 2%; 12, 9%; 4, 3%; 9, 7%; 2, 1%; 3, 2%; 3, 2%; 3, 2%; 4, 3%; 15, 11%; 12, 9%
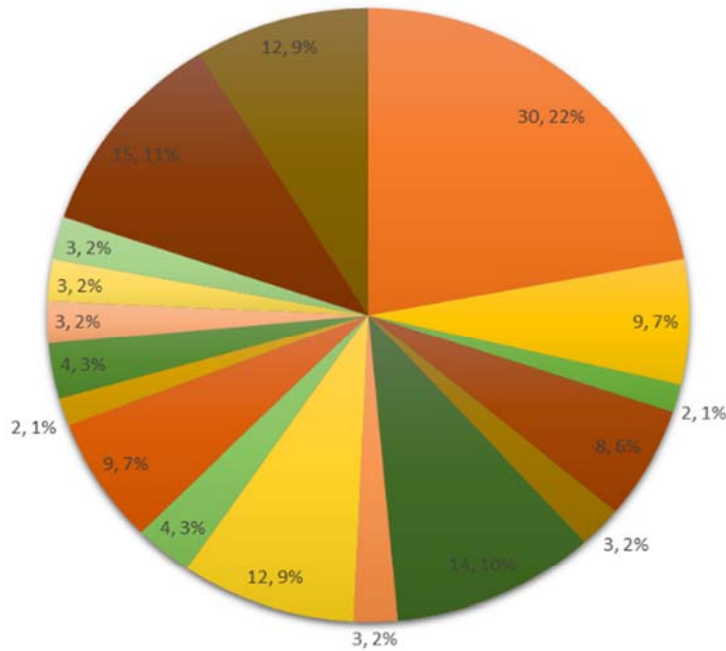
- Race
- Color
- Religion
- Sex
- National Origin
- Disability/Handicap
- Familial Status
- Age
- Other
- Familial Status
- Ethnicity
- Marital Status
- Age
- Limited English Profieciency
- Citizenship status
- Level of income
- Source of income

Figure 721: Respondents and fair housing

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VI.   FAIR HOUSING IMPEDIMENTS AND RECOMMENDATIONS

Introduction

The City of Dallas has identified impediments to fair housing choice and recommendations for specific actions that the City could take to reduce or remove those impediments. This section reviews any current impediments identified through this 2019 study, discuss the issues related to the impediments and their impact on members of the protected classes and the community, and provide recommendations to the City. The recommendations consist of both reactive and proactive actions to address the impediments and ultimate acceptance and implementation of any or all recommendations will be done by the City's governing Council. This section also reviews the impediments and action plan identified in the City's prior 2015 AI and the status of fair housing activities and whether the impediments then still need addressing.

One of the main implications of HUD's final rule on "affirmatively furthering fair housing" is a focus on affirmative housing actions in the Consolidated Plan process. Fair housing planning will become one of the factors in setting Consolidated Plan priorities and how resources are to be committed including fair housing activities. Many of the recommendations contained in this report are based on a proactive or "affirmative" approach that reflects the goals and objectives of the proposed Fair Housing Rule up to its becoming a final rule.

In order to develop a viable implementation plan, the City may view the recommendations as a framework for addressing the impediments and a guide to facilitate further community dialogue, research, feasibility testing, and fair housing action planning.

Summary of 2015 Impediments and Recommendations

The following is a summary of impediments and actions identified in the 2015 AI. A status of the recommendations is included herein showing actions taken by the City, the amounts of CDBG and other funds invested in fair housing activities and whether the impediment still exists. A fair housing action plan was developed in response to the 2015 impediments. Most of the proposed activities were education and outreach related and as such were implemented by the City's FHO.

<u>Previous Impediment A:</u> Lack of affordable housing for Dallas residents.

Recommendation #A-1 The City should increase the supply of affordable housing for renters and homeowners by supporting the development of inclusive housing projects by leveraging federal, state, and local public funding with private sector funding.

Recommendation #A-2 The City should improve partnerships with non-profit housing developers, such as Community Housing Development Organizations (CHDOs) and Community Land Trusts (CLTs), which are familiar with the development process, aware of neighborhood issues, and that have a mission to improve the lives of low- and moderate-income persons.

Recommendation #A-3 Provide a fast-track permitting and site development review process for affordable housing projects and dedicate staff in the Planning and Economic Development departments to assist non-profit developers to move small scale, infill housing projects through each stage of development.

Recommendation #A-4 Offer new or continue existing development incentives such as density bonuses, waivers of setbacks, lot widths, and height restrictions, and reduce or waive impact fees in order to increase the supply of buildable lots for infill housing and lower costs for housing development.

Recommendation #A-5 The City should establish a policy that requires deed restrictions with housing developers to maintain long-term affordability even when federal/state funds are not used in the project.

Recommendation #A-6
In order to maintain or increase homeownership in Dallas, the City should increase the provision of services including housing, credit, and foreclosure prevention counseling and financial assistance with the goal of reaching an increased number of minorities and low- and moderate-income households.

Recommendation #A-7
The City should work towards increasing leveraging as much as possible with private sector funds and other public funding to fund the development of a variety of affordable and accessible housing units suitable for different types of households. The City should also implement policies which encourage the creation, construction, and/or preservation of affordable and accessible housing for families in all areas of the City.

Action/Goal: Increase the production and preservation of affordable housing units.

Current status: A housing policy was developed with the goal of producing thousands of affordable units in the Dallas. The City has also successfully produced and preserved units through a multitude of programs in recent years.

Updated Recommendation(s): The goal has been partially met and should be maintained.

Previous Impediment B: Lack of accessible housing limiting housing choices for seniors and persons with disabilities.

Recommendation #B-1 Based on current supply and projected growth of residents with disabilities and an aging population, the City should determine the need for accessible units and seek out additional resources to fill the gap.

Recommendation #B-2 The City should review its policies, staff training needs, and awareness related to accessibility inspections of new multi-family housing to ensure that builders are meeting accessibility design requirements.

Recommendation #B-3 The City should consider incorporating the visitability standards into its building requirements for new single-family housing and housing not covered by federal accessibility regulations.

Action/Goal: Increase the number of accessible housing units based on need.

Current status: Targeted action has been taken to increase housing choices for seniors and persons with disability.

Updated Recommendation(s): The goal has been partially met and should be maintained.

Previous Impediment C: Housing rehabilitation resources available to the City are not distributed between owner and renter households.

Recommendation #C-1 Develop and implement a rental rehabilitation program that provides funding to property owners that provide housing for low- and moderate-income persons including persons with disabilities.

Action/Goal: The City should expand the rehabilitation programs to include repairs and accessibility modifications for rental properties.

Current status: NSP funds and HOME Tenant-based Rental Assistance have been used to offer some rehabilitation resources to Dallas's renters.

Updated Recommendation(s): The goal has been partially met, but further action is necessary to bridge the gap between owner and renter households.

Previous Impediment D: Lack of awareness of a reasonable accommodation procedure to provide relief from codes that may limit housing opportunities to individuals with disabilities.

Recommendation #D-1 The City should coordinate outreach and education about the procedures to seek reasonable accommodation that allows certain deviations from the City's zoning and land use requirements and development standards.

Action/Goal: The City should ensure that persons with disabilities are aware of the procedure by which such persons may request reasonable accommodations or modifications on the basis of disability.

Current status: Held a fair housing forum during Fair Housing Month with presentations on disability protections. The City also conducted fair housing training for Disability Rights Texas and conducted training with lenders and real estate professionals working with the City of Dallas Mortgage Assistance Program.

Updated Recommendation(s): The action has been put in place and should be maintained.

Previous Impediment E: Historic pattern of concentration of racial/ethnic and low-income populations in the City.

Recommendation #E-1 Adopt policies that increase the supply of affordable housing for families in all areas and neighborhoods of the city.

Recommendation #E-2 Increase coordination and collaboration between the City's Fair Housing Office, the Housing and Community Services and other departments in the housing strategy and annual planning process.

Recommendation #E-3 The City should annually monitor residential concentration by race and/or ethnicity.

Recommendation #E-4 The City should assess the feasibility of using strategies such as developing housing on smaller non-conforming lots, scattered site infill rental housing and land donation in neighborhoods throughout the City.

Action/Goal: Develop a strategy to address historic patterns of concentration.

Current status: The City has worked with the community in developing numerous goals to address this issue over the course of completing the Assessment of Fair Housing.

Updated Recommendation(s): Complete the process articulated in the City of Dallas AFH Report and reiterated within this Analysis of Impediments.

Previous Impediment F: Lending practices may be disproportionately impacting racial and ethnic minority populations based on loan denial rates.

Recommendation #F-1 The City should coordinate with lenders and banking associations to ensure that any discriminatory lending practices are eliminated.

Action/Goal: 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.

Current status: The FHO has ramped up its education and outreach activities to cover underrepresented populations. The City has also conducted Monthly Homebuyer Training to educate homebuyers on fair housing laws and their rights.

Updated Recommendation(s): The action has been put in place and should be maintained.

Previous Impediment G: Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.

Recommendation #G-1 The City of Dallas should work with its partners to promote education and awareness about mental disabilities and encourage housing providers to provide reasonable accommodation for persons with mental disabilities to ensure that they do not lose housing because of their disability.

Action/Goal: Promote education on reasonable accommodation and support services for persons with mental disabilities.

Current status: The City conducted Fair Housing Training for Disability Rights Texas and held a Fair Housing Forum during Fair Housing Month with presentations on disability protections.

Updated Recommendation(s): The action was put in place and should continue to be expanded.

Previous Impediment H: Inadequate fair housing education and awareness in community, especially for underrepresented and minority populations with Limited English Proficiency (LEP).

Recommendation #H-1 The City of Dallas should expand its fair housing education and outreach efforts to groups that are underrepresented in its pool of clients to help continue to keep the public informed of their rights and specifically targeting more efforts in minority areas.

Recommendation #H-2 The City should use the City's cable television channel(s) and social media as a source of fair housing information and public education efforts including the use of public service announcements and fair housing videos from HUD's YouTube channel.

Recommendation #H-3 Increase education and awareness of the City's FHO through partnerships with agencies that represent individuals and families with LEP.

Action/Goal: Continue fair housing education and outreach and expand opportunities for fair housing training for underrepresented populations such as persons with LEP, Asian Americans, and persons with disabilities including the hearing impaired, and the LGBT community.

Current status: The Fair Housing Office has increased outreach, training, and education. The City also purchased additional advertisements on Spanish-language radio and conducted Fair Housing Training for Disability Rights Texas.

Updated Recommendation(s): The recommended action has been put in place and should be maintained.

Previous Impediment I: Residents face challenges accessing public transportation, especially special needs population members including persons with disabilities and homeless persons.

Recommendation #I-1: Seeking funding opportunities to improve public transportation and infrastructure, the City should ensure that consideration is given to the transportation needs of protected class members and low- and moderate-income persons. Attention should be given to the cost of utilizing transit services, service areas, availability and time of routes, fleet size for alternative transit services such as Dial-A-Ride, and access to employment opportunities.

Action/Goal: Increase access to public transportation and transit services for low- and moderate-income persons and protected class members.

Current status: The Fair Housing Office has increased outreach, training, and education. The City also purchased additional advertisements on Spanish-language radio and conducted Fair Housing Training for Disability Rights Texas.

Updated Recommendation(s): The recommended action has been put in place and should be maintained.

Previous Impediment J: Not in my Backyard (NIMBYism) sentiment is an impediment to fair housing choice.

Recommendation #J-1 Focus training and public hearings throughout the City on NIMBYism to provide residents an opportunity to express their concerns and learn about affordable and accessible housing.

Recommendation #J-2 Work with partners throughout the region to raise awareness of the concepts of "housing affordability" and "affordable financing."

Action/Goal: Increase education and outreach to dispel myths and false perceptions about affordable housing.

Current status: New HUD requirements and addition of staff have enabled the Fair Housing Office to increase its outreach, training, and education efforts.

Updated Recommendation(s): The recommended action has been put in place and should be maintained.

Summary of Current 2019 Impediments and Recommended Actions

Based on the available data and community input, the following is a summary of the current impediments to fair housing choice in both the public and private sectors in 2019 and recommended actions to address them. Some previously identified impediments remain in this current list. For each impediment, the analysis recommends remediation strategies.

Affordable Housing

The FHA does not require that communities plan for constructing or assist in the construction of "affordable" housing nor require that communities be or advertise themselves as "diverse communities." However, HUD has taken the position that the inclusion of "affordable" housing and promotion of a community as a "diverse community" are steps that communities can take to "affirmatively further fair housing." Protected classes are often over-represented in the low- and moderate-income categories and often likely to need "affordable" housing. Taking steps to address the housing needs of lower income persons and to establish respect for a "diverse" community are therefore regarded by HUD as "affirmatively furthering fair housing actions." Barriers to affordable housing are addressed in the City's Comprehensive Plan and it is incorporated by reference. Other jurisdictions address affordable housing in their AIs and any new regulation may require that affordable housing be addressed. As currently defined by statute, regulation, and the Guide, the lack of affordable housing and related issues do not represent an impediment but because of the potential impact on fair housing issues, affordable housing is addressed in this AI.

Impediment #1: Lack of affordable housing in high-opportunity areas

Action: Increase access to affordable housing in high-opportunity areas.

Recommendation #1-A: Establish Housing Trust Fund to support aggressive affordable housing development and deep income targeting strategies in high-opportunity areas and non-segregated areas.

Recommendation #1-B: File *amicus curae* brief in support of lawsuit challenging the Texas law prohibiting municipal source of income protection ordinances.

Recommendation #1-C: Provide mobility counseling and search assistance to help families make informed housing choices based on data and other information on neighborhood opportunity.

Recommendation #1-D: Create outreach programs and provide financial/programmatic incentives for landlords in high-opportunity areas.

Recommendation #1-E: Establish and fund a set of incentives based on successful best practices, including consideration of risk pools, paid deposits and application fees, double deposits, and single point of contact for problems.

Discussion

Increasing access to higher opportunity areas deconcentrates poverty, combats segregation and fosters 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 pursuit of deep income targeting strategies/programs, and the provision of incentives are intended to remove such barriers.

Impediment #2: Insufficient affordable housing available in the City of Dallas

Action: Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas.

Recommendation #2-A: 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.

Recommendation #2-B: Develop strategies to retain expiring LIHTC projects as affordable housing.

Recommendation #2-C: Proactively lock in affordable housing in gentrifying areas (i.e. LITHC developments, TIFs).

Recommendation #2-D: Draw from the Montgomery County model to develop right of first refusal program for housing authorities to purchase buildings being sold for the purpose of conversion to condominiums.

Recommendation #2-E: Develop programs to protect homeowners and affordable rental units from rapidly rising valuation and taxes in gentrifying neighborhoods (Market Segmentation analysis for property appraisal: Travis County model).

Recommendation #2-F: 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).

Recommendation #2-G: Consider expanded home repair programs to include single- and multifamily housing, owner-occupied and rental property.

Recommendation #2-H: Continue to develop mixed-income housing that preserves and increases the quantity of high-quality affordable housing.

Recommendation #2-I: Expand special tax districts (TIFs, etc.) that provide funds for affordable housing development.

Discussion

The need for affordable housing in Dallas and the DFW region is growing exponentially, 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 fosters inclusive, mixed-income communities. The supply of affordable housing is also affected by the loss of affordable housing (including gentrification, demolition, and conversion to higher-end units). Proactive measures can be taken to protect residents and mitigate seemingly irrepressible market pressures. One path to doing so includes "locking-in" affordability as markets transition, but property valuation processes must also account for "markets within markets" (segmentation approach). A viable and complementary route includes expanding financial resources for home repairs.

Impediment #3: Lack of affordable, accessible housing for persons with disabilities

Action: Increase supply of affordable, accessible housing for persons with disabilities

Recommendation #3-A: 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.

Recommendation #3-B: 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.

Recommendation #3-C: 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).

Recommendation #3-D: Form a partnership to deliver training sessions on fair housing accessibility issues to local code enforcement officials, design professionals and property owners.

Recommendation #3-E: Develop programs to promote universal design (for housing accessibility) in new construction and renovation.

Recommendation #3-F: Continue to survey public infrastructure (sidewalks, crosswalks, business entrances, etc.) for accessibility and allocate ample funds to bring public areas up to code.

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.

Impediment #4: Lack of public or private investments in certain neighborhoods

Action: Make investments in targeted and segregated neighborhoods to increase opportunity while protecting residents from displacement.

Recommendation #4-A: Ensure meaningful community engagement in identifying alternate uses for vacant and derelict land to support food access, recreation and green space in underserved communities.

Recommendation #4-B: Revise boundaries of designated focus areas in housing policy to target racially segregated census tracts, R/ECAPs and/or the most distressed real estate markets.

Recommendation #4-C: 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.

Recommendation #4-D: 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.

Recommendation #4-E: Collaborate with transportation agencies to create innovative programs that provide affordable transportation options in lower opportunity areas and R/ECAPs and for HUD-assisted families.

Recommendation #4-F: Adopt racial/ethnic impact statement.

Discussion

Stark patterns of neighborhood inequities are evident within 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 (such as transportation, housing, neighborhood services, etc.).

Impediment #5: Insufficient access to opportunity for residents of supported housing

Action: Increase support and services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing.

Recommendation #5-A: Partner with supportive agencies and nonprofits to provide on-site support to residents (counseling, childcare, transportation).

Recommendation #5-B: Annually gather feedback from residents on the quality of the management of publicly supported housing units and/or landlord-related issues.

Recommendation #5-C: Foster economic self-sufficiency by supporting jobs skills workshops to help PHA residents obtain and retain jobs and/or support agencies that provide job training programs for PHA residents.

Recommendation #5-D: Evaluate economic viability of subsidized households; leverage HUD form 50058 to identify needs and provide adequate assistance/support/referral.

Recommendation #5-E: Expand efforts toward coordination among public housing authorities with residents at common properties, including inspections, monitoring and problem solving.

Recommendation #5-F: Expand fair housing outreach, education and training for residents and individuals on wait lists.

Recommendation #5-G: 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.

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. As a result, the pursuit of this goal is indissociable from sitting selection decisions and policies.

Impediment #6: Lack of education regarding affordable housing and fair housing enforcement

Action: Increase access to information and resources on fair and affordable housing

Recommendation #6-A: Support tenant rights workshops to educate low-income renters.

Recommendation #6-B: Provide support (letters, endorsements, financial aid) for local fair housing groups' education and fundraising.

Recommendation #6-C: Establish ongoing community meetings with financial institutions, insurance companies, landlords, real estate agents and foundations to enhance their knowledge of and support for fair housing goals.

Recommendation #6-D: Develop a robust plan to assess banks' performance related to the Community Reinvestment Act (CRA).

Recommendation #6-E: Expand fair housing outreach, education and training for youth and other targeted populations through collaborative strategies.

Discussion

The lack of awareness about both the fair housing resources available and tenants' rights is very likely to worsen housing problems and fuel predatory practices. Active dissemination of materials and outreach, as well as effective fair housing enforcement are pivotal to affirmatively further fair housing.

APPENDICES

Appendix 1- Glossary of tables and figures

Appendix 2- List of acronyms

Appendix 3- Housing goals

Contributing factors by type

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%

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%
Childcare	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%

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%

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%

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

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

Finalized housing goal matrix

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.

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 affected 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.

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

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…).

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, childcare, 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.

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.

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.

Appendix 4- HUD data documentation

Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation

Data Version AFFHT0004a

Document last revised:

March 5, 2019

HUD, Office of Policy Development & Research

Document Revision History

Date	Change Description / Purpose
March 5, 2019	Original document provided with Raw Data Version AFFHT0004a posted on HUD Exchange

Overview

The Affirmatively Furthering Fair Housing (AFFH) rule created a standardized process for fair housing planning that program participants use to help meet their longstanding requirement to affirmatively further fair housing. As part of this process, program participants analyze data and other information to assess fair housing issues in their jurisdictions and regions. Program participants use HUD-provided data, as well as local data and local knowledge, to conduct their assessment of fair housing.

This document outlines the data, methods, and sources behind the data and mapping 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 local knowledge that is more robust, timely, or accurate. It represents a baseline effort to assemble consistent, nationally available data from a variety of sources compiled into one location.

Data Updates, Additions and Revisions

HUD-provided data are periodically updated. Versions of HUD-provided data are labeled with the letters 'AFFHT' followed by four digits (e.g. AFFHT0001). The labels progress in chronological order, meaning that the greater the number, the more recent the version of HUD-provided data. More information on earlier data versions are provided on HUD Exchange.

Currently the AFFH-T provides maps and tables using data version AFFHT0004a. The following additions, revisions and corrections are now included in the AFFHT0004a maps and tables.

In previous versions, HOME Consortia jurisdictions whose boundaries do not fall entirely within a single CBSA may have had its region data based on adjacent CBSA or a CBSA that was within the HOME Consortia jurisdictional boundary. In AFFHT0004a, this issue has been addressed.

In previous versions of the raw data, there were missing or incorrect tract-level Environmental Health Indices. AFFHT0004a contains the corrected Environmental Health index values for tract-level reports in the raw data.

Table 1. Data Sources by Data Version Number

AFFH-T data version Number	AFFHT0004	AFFHT0003	AFFHT0002	AFFHT0001
Boundaries for Jurisdictions	Program Participant list for FY2017	Program Participant list for FY2016	Program Participant list for FY2016	Program Participant list for FY2013
R/ECAPs	ACS 2009-13 with CBSA delineations released in July 2015	ACS 2009-13 with CBSA delineations released in July 2015	ACS 2009-13 with CBSA delineations released in July 2015	ACS 2009-13 with CBSA delineations released in February 2013
Brown Longitudinal Tract Database (LTDB)	1990, 2000 and 2010	1990, 2000 and 2010	1990, 2000 and 2010	1990 and 2000
Inventory Management System (IMS)/PIH Information Center (PIC)	2016	2016	2016	2013
Tenant Rental Assistance Certification System (TRACS)	2016	2016	2016	2013
Comprehensive Housing Affordability Strategy (CHAS)	2009-13	2009-13	2009-13	2008-12
Longitudinal Employer-	2014	2014	2014	2013

Household Dynamics (LEHD)				
Great Schools	2013-14*	2013-14*	2012	2012
Common Core of Data	2013-14*	2013-14*	2012	2012
School attendance boundaries	Maponics School Attendance Zone Database 2016*	Maponics School Attendance Zone Database 2016*	School Attendance Boundary Information System (SABINS) 2012	School Attendance Boundary Information System (SABINS) 2012
National Air Toxics Assessment (NATA)	2011	2011	2011	2005
Location Affordability Index (LAI)	2008-2012	2008-2012	2008-2012	2008-2012

*Please note that school proficiency data for jurisdictions in Kansas, West Virginia, and Puerto Rico have not been updated because no data was reported for these jurisdictions in the Great Schools 201314 dataset. In the AFFH-T, the school proficiency index for these jurisdictions will continue to display the data from AFFHT0002 when AFFHT0004 is selected. Jurisdictions in all other states have new, updated data for school proficiency as noted in the AFFHT0004 details above. Please also refer to the section below on the School Proficiency Index for more information.

Data Sources

Table 2 lists data sources, years, and the spatial scale used to populate the tables and maps in the

AFFH-T.

Table 2: 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, 4	1, 5-13	Decennial Census, 2010
Demographics	Race/Ethnicity population in 2010, 2000 & 1990	Tract	2	2	Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990
Demographics	Limited English Proficiency (LEP) population; LEP languages; Foreign-born population; Foreignborn population place of birth (national origin)	Tract	1, 2, 4	3, 4, 6-13	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	14, 15	American Community Survey (ACS), 2009-2013[b]
Demographics	Population by Age, Sex, Family Type	Tract	1, 2, 4	7-13	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, 1990, 2000 & 2010
Housing	Population, housing units, occupied housing units, race/ethnicity, age, disability status, household type, and household size by Housing Type	Development; Tract	5-8, 11, 15	5	Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014 [c]
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	Tract	9, 10, 16	6, 16, 17	Comprehensive Housing Affordability Strategy (CHAS), 2009-2013

Data Category	Variables	Geographic level or Primary Sampling Unit	Tables	Maps	Sources and years
	by Race, Household Type, Household Size; Housing Tenure				
Opportunity Indices	Dissimilarity Index	Community Development Block Grant (CDBG); HOME Investment Partnerships Program (HOME), 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	9, 12	American Community Survey (ACS), 2009-2013
Opportunity Indices	School Proficiency Index	Block group	12	7	Great Schools (proficiency data), 2013-14; Common Core of Data (4th grade enrollment and school addresses), 201314; Maponics School Attendance Zone database, 2016
Opportunity Indices	Low Transportation Cost Index; Transit Trips Index	Tract	12	10, 11	Location Affordability Index (LAI) data, 2008-2012
Opportunity Indices	Jobs Proximity Index	Block group	12	8	Longitudinal Employer-Household Dynamics (LEHD), 2014
Opportunity Indices	Environmental Health Index	Tract	12	13	National Air Toxics Assessment (NATA) data, 2011

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.

For variables on disability, percentages are calculated based on the total population age 5 years and older. Because of incorrect or missing address information, which prevents 100 percent success rate in geocoding, some properties in IMS/PIC as well as

TRACS may not be included in the calculation (which may impact housing data).

Levels of Geography and Weights

The AFFH-T includes data for all U.S. states, the District of Columbia, and Puerto Rico. Users may access data through the AFFH-T at various spatial scales, including geo-boundaries of Census tracts, the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Core-based Statistical Area (CBSA), County, Public Housing Agency (PHA) Service

Area, State entitlement and non-entitlement areas, and State. As shown in Table 2, most data in the AFFH-T 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-T map views are at the Census tract level for Local Governments and for PHAs, and at the county level for States. 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 and CBSA, PHA Service Area, county, State entitlement and non-entitlement areas, and State 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-T are based on those released by Census in

2010. The AFFH-T incorporates minor changes indicated in the ACS "Geography Release Notes" for 2011 and 2012 on the Census Bureau website, resulting in boundaries and corresponding data adjusted to calendar year 2012. The CDBG and HOME jurisdiction, as well as State entitlement and non-entitlement boundaries are based on political jurisdiction boundaries for calendar year 2017. The CBSA boundaries are based on OMB 2015 definitions. The PHA boundaries are based either on summary level 050 (State-County) or on summary level 160 (State-Place).

The CDBG level, the HOME level and the State entitlement and non-entitlement reflect the geographic boundaries for grantees that receive direct allocations of CDBG and HOME funds from HUD. CDBG and HOME jurisdictions as well as State entitlement and non-entitlement level are not census-designated areas, which mean 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 CDBG, HOME jurisdictions and State entitlement and non-entitlement level Census geographic identifiers at the summary level 070 (state-county/county subdivision-place/remainder), summary level 080 (state-county-county subdivisionplace/remainder-census tract) and summary level 091 (state-county-county subdivisionplace/remainder-census tract-block group). Similarly, although county, place, Census tract and block group are all census-designated areas, there is necessarily no direct mapping of a Census tract or block group to a State-Place (summary level 160). A series of technical procedures were necessary to construct a crosswalk between the Census tract/block group and place.

Weights

At the boundaries of local government, PHA and State jurisdictions and their respective regions, some Census tracts/block groups fell partially within the boundaries and partially outside of the boundaries. Data from these tracts were weighted by the share of the population within the boundaries to approximate including only the portion of those tracts/block groups within the jurisdictions and regions in estimates reported for these levels.

Race/Ethnicity

Among other protected characteristics, the Fair Housing Act prohibits housing discrimination based on race. HUD offers data 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 their ethnicity as Hispanic. Other race/ethnicity data are discussed in sections IX and XI.

To make the racial categories in the demographic trend data more comparable between the historic data and the 2010 data, HUD has produced two sets of 2010 race data, provided in Table 2 and Map 2. One is based on 2010 Census race/ethnicity categories and the other is based on the categories provided in the Longitudinal Tract Database (LTDB) produced by Brown University. In Table 2 and Map 2, the 1990/2000/2010 "Trend" data uses LTDB, which does not have the Other category nor the Two or More Races category. The "Current" data in Table 2 is the same data in Table 1, but without the additional categories in Table 1, in order to align with the 1990/2000/2010 "Trend" data in Table 2.

The data for R/ECAPs in Map 2 are based on LTDB 2010 data that have been normalized to 2012 Census tract boundaries. For all maps, the CBSA definitions remain the same, using the Census Bureau's July 2015 CBSA delineation.

Data Source: American Community Survey (ACS) 2009-2013; Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010

Related AFFH-T Local Government, PHA and State Tables/Maps: Tables 1, 2, 4, 12; Maps 1, 2, 513.

National Origin and Limited English Proficiency (LEP)

The Fair Housing Act also prohibits housing discrimination based on national origin. The AFFH-T 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.'"

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 AFFH-T Tables, while the top five are displayed in the AFFH-T Maps. HUD limits the number of categories for the maps to enable users to better visualize the most populous groups. The data does not contain National origin and LEP for Puerto Rico.

Data Source: American Community Survey (ACS) 2009-2013; Decennial Census, 2000; Decennial Census 1990.

Related AFFH-T Local Government and PHA Tables/Maps: Tables 1, 2, 4; Maps 3, 4, 6-13.

Related AFFH-T State Tables/Maps: Tables 1, 2, 4; Maps 3, 4.

Disability Status and Type

The Fair Housing Act prohibits housing discrimination against any person based on disability. The AFFH-T 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 persons 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 certain HUD programs, which sometimes use different definitions of disability for purposes of determining eligibility.

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.

Data Source: American Community Survey (ACS), 2009-2013; Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System

(TRACS), 2016

Related AFFH-T Local Government, PHA and State Tables/Maps: Tables 1, 13, 14, 15; Maps 14, 15.

Sex

The Fair Housing Act prohibits housing discrimination against any person based on sex. The AFFH-T provides information on male/female status.

Data Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010

Related AFFH-T Local Government, PHA and State Tables/Maps: Tables 1, 2.

Families with Children and Age

The Fair Housing Act prohibits housing discrimination against any person based on familial status. For purposes of the Fair Housing Act, familial status includes one or more individuals under the age of 18 being domiciled with a parent or other person with legal custody of such individuals. The AFFH-T 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 AFFH-T 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 AFFH-T.

Data Source: Decennial Census, 2010; Decennial Census, 2000; Decennial Census 1990 Related AFFH-T Local Government and PHA Tables/Maps: Tables 1, 2, 4; Maps 7-13.

Related AFFH-T State Tables/Maps: Tables 1, 2, 4.

Households in Publicly Supported Housing

The AFFH-T provides data on households within the following housing categories: Public Housing,

Section 8 Project-based Rental Assistance (PBRA), other assisted housing multifamily properties, and Section 8 tenant-based Housing Choice Voucher (HCV) Program. The "Other Multifamily" category includes properties funded through the Section 202 Supportive Housing for the Elderly Program (with both capital advance grants

and Project Rental Assistance Contracts) and the Section 811 Supportive Housing for Persons with Disabilities Program.

The AFFH-T also provides locational information for Low-Income Housing Tax Credit properties.

The sources for data on 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 AFFH-T reports data by housing category 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, 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, 50 percent, and 80 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 non-Hispanic White, non-Hispanic Black, Hispanic, and non-Hispanic 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 or ethnically concentrated areas of poverty (R/ECAPs) (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 multifamily properties. Population characteristics include race/ethnicity (White, Black, Hispanic, Asian), and households with children. 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 spatial information that is precise enough to accurately determine their location within a Census tract, 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, Map 5 also includes only developments with spatial information that is precise enough to accurately determine their location within a Census tract. Over 94 percent of Public Housing, PBRA, and other multifamily have sufficient geographical information to be included in the tables and maps.

Tables 11 and 15 present data on unit size (households in 0 or 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), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014; Decennial Census, 2010; Comprehensive Housing Affordability Strategy (CHAS), 2009-2013

Related AFFH-T Local Government and PHA Tables/Maps: Tables 5-8, 11, 15; Map 5.

Related AFFH-T State Tables/Maps: Tables 5-8, 15; Map 5.

Racially or Ethnically Concentrated Areas of Poverty (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 group concentration threshold and a poverty test. The racial/ethnic group 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:

$$\frac{R}{ECAP_i} = yes \ldots if \ldots \begin{cases} PovRate_i \geq \left[3 * \mu_{PovRate}^{cbsa}\right] \\ or \\ PovRate_i \geq 0.4 \end{cases} \cap \left[\frac{(Pop_i - NHW_i)}{Pop_i}\right] \geq 0.50$$

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, places outside of these geographies are unlikely to have racial or ethnic group concentrations as high as 50 percent. In these areas, the racial/ethnic group concentration threshold is set at 20 percent.

Since the R/ECAPs information is based on CBSAs, in the AFFHT0004 data version, there is no R/ECAPs information for counties in the map tool. At the State level, the current and historical R/ECAPs flags are replaced by the following attributes: County Population in R/ECAPs, Percentage of County Population living in R/ECAPs, Number of R/ECAPs County Tracts, and Percentage of County Tracts that are R/ECAPs.

Data Source: American Community Survey (ACS), 2009-2013; Decennial Census (2010); Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010 <u>Related AFFH-T Local Government and PHA Tables/Maps</u>: Tables 4, 7; Maps 1-17.

<u>Related AFFH-T State Tables/Maps</u>: Tables 4, 7; Maps 1-15, 18.

<u>References:</u>

Wilson, William J. (1980). The Declining Significance of Race: Blacks and Changing American Institutions. Chicago: University of Chicago Press.

Housing Problems and Disproportionate Housing Needs

To assist communities in describing and identifying disproportionate housing needs in their jurisdictions and regions, the AFFH-T provides data identifying instances where housing problems or severe housing problems exist. The AFFH-T 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 demonstrates 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 AFFH-T provides data on the number and share of households with one of the following four housing problems:

Lacks complete kitchen facilities

Lacks complete plumbing facilities

More than one person per room

Cost Burden - monthly housing costs (including utilities) exceed 30% of monthly income

Additionally, the AFFH-T provides data on the number and share of households with one or more of the following "severe" housing problems, defined as:

Lacks complete kitchen facilities

Lacks complete plumbing facilities

More than one person per room

Severe Cost Burden - monthly housing costs (including utilities) exceed 50% of monthly income

Program participants should review these data to determine where disproportionate housing needs may be found in their jurisdictions and regions. 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 as a whole or than another sub-group.

Data Source: Comprehensive Housing Affordability Strategy (CHAS), 2009-2013

<u>Related AFFH-T Local Government, PHA and State Tables/Maps</u>: Tables 9, 10; Map 6.

Housing Tenure

To assist in understanding the entire housing stock in a jurisdiction and region, the AFFH-T provides information on housing tenure. The number and percentage of housing units occupied by renters and homeowners are available for households overall and by the race of the head of household. Additionally, the AFFH-T contains a map showing the percentage of rental units that are affordable, defined as renting at or less than 30 percent of household income for a household whose income is at 50 percent of area median income.

Data Source: Comprehensive Housing Affordability Strategy (CHAS), 2009-2013 Related AFFH-T Local Government and PHA Tables/Maps: Table 16; Maps 16, 17.

Related AFFH-T State Tables/Maps: none.

Indices

HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. A description of the methodology for each of the following indices may be found below:

Dissimilarity Index

Low Poverty Index

School Proficiency Index

Jobs Proximity Index

Labor Market Engagement Index

Low Transportation Cost Index

Transit Trips Index

Environmental Health Index

Table 3 of the AFFH-T tables provides values for the dissimilarity index. Table 12 of the AFFH-T tables provides values for all the remaining indices, which relate to disparities in access to opportunity.

To generate Table 12, index values were calculated for each census tract. These tract values were averaged and then weighted based on the distribution of people of different racial and ethnic groups within the CDBG jurisdiction, HOME jurisdiction, CBSA, PHA Service Areas, State entitlement/non-entitlement areas, or State 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 racial and ethnic groups who are living below the federal poverty line within the CDBG, HOME, or State Entitlement jurisdiction, CBSA, PHA Service Area, and State. 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-T, 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-T.

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 current dissimilarity indices for 2010 exclude multiracial individuals, while the 1990, 2000, and 2010 trend racial data from the Brown Longitudinal Tract Database includes multiracial individuals in the racial categories.

Data Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990. Decennial Census data are Block-group level, , and LTDB data are census tract level..

Related AFFH-T Local Government and PHA Tables/Maps: Table 3.

Related AFFH-T State Tables/Maps: Table 3; Map 18.

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 used a two-stage process for developing the data needed to analyze disparities in access to opportunity. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important opportunity indicators. In the second stage, HUD compares these rankings across people in particular

racial and economic subgroups to characterize disparities in access to opportunities. 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 opportunity indicators do not capture all that is encompassed in an individual's or a family's access to opportunity. In quantifying opportunity indicators, HUD is quantifying features of neighborhoods for the purpose of assessing whether significant disparities exist in the access or exposure of particular groups to these quality of life factors. While these important dimensions are identified by research as important to quality of life, the measures are not without limitations. HUD constrained the scope of HUD-provided data 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 may not be as geographically tied to individual neighborhoods as 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 opportunity indicators that may be relevant, such as neighborhood crime or housing unit lead and radon levels. However, these lack consistent neighborhood-level data across all program participant geographies. HUD encourages program participants to supplement the HUD-provided data with local data and local knowledge on these other opportunity indicators so that the analysis is as thorough as possible. The five opportunity indicators 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 AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 12. School Proficiency Index

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 3 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.

In the AFFHT0004 data version, there is no school proficiency data for jurisdictions in Kansas, West

Virginia, and Puerto Rico because no data was reported for jurisdictions in these states in the Great Schools 2013-14 dataset. For the jurisdictions in these states, the block group and county level school proficiency index in Map 7 revert to using AFFHT0002, instead of the data in AFFHT0004. In Table 12 for these jurisdictions, the school proficiency index also reverts to AFFHT0002, as well as for regions that do not cross state boundaries. However, please note if region crosses state boundaries, Table 12 region-level school proficiency index reflects AFFHT0004 data.

The raw data contain an alternative school proficiency index that is adjusted for the percentage of students that are economically disadvantaged. Please note that the use of this alternative school proficiency index is optional; program participants are not required to include the alternative school proficiency index in their analysis. The alternative school proficiency index is not included in the AFFH-T online maps and tables, but is only provided in the raw data provided on HUD Exchange.

The adjusted school proficiency index is a function of the percent of 4th grade students, economically disadvantaged and not economically disadvantaged, that are proficient in reading and math on state test scores for up to three schools (i=1,2,3) within 3 miles of the block group centroid. In the formula below, j=1 denotes economically disadvantaged students, and j=2 denotes students that are not economically disadvantaged. $S_{i,j}$ denotes the count of group j students in school i, and s_i denotes total 4th grade enrollment in school i.

$$School_i = \sum_{i=1}^{3} \frac{s_i}{S} * \sum_{j=1}^{2} \frac{s_{i,j}}{s_i} \, \theta_{i,j}$$

Where $\theta_{i,j}$ is an index, percentile ranked by state, for group j in school i:

$$\theta_{i,j} = \left[\frac{1}{2} * r_{i,j} + \frac{1}{2} * m_{i,j} \right]$$

$m_{i,j}$ denotes math scores for group j in school i, and $r_{i,j}$ denotes reading scores for group j in school i.

Interpretation

Values are percentile ranked at the state level and range from 0 to 100. The higher the score, the higher the quality of the school system in a neighborhood.

Data Source: Great Schools (proficiency data, 2013-14); Common Core of Data (4th grade school addresses and enrollment, 2013-14); Maponics (attendance boundaries, 2016).

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 7.

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 (A_i) 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) database has no data for Puerto Rico and has a concentration of missing records for Massachusetts.

The downloadable raw data contain an alternative jobs proximity index. Please note that the use of this alternative jobs proximity index is optional; program participants are not required to include the alternative jobs proximity index in their analysis. The alternative jobs proximity index is not included in the AFFH-T online maps and tables, but is only provided in the raw data provided on HUD Exchange.

The alternative index is computed with the following formula, weighting the numerator and denominator by the inverse of distance instead of distance squared:

$$A_i = \frac{\sum_{j=1}^{n} \frac{E_j}{d_{i,j}}}{\sum_{j=1}^{n} \frac{L_j}{d_{i,j}}}$$

Interpretation

Values are percentile ranked at the CBSA level 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, 2014

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 8.

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 AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 9.

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-T correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary. More specifically, among this household type, the AFFH-T models 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 value, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a variety 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 AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 11.

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., CBSA). The estimates come from the Location Affordability Index (LAI). The data used in the AFFH-T correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary.

More specifically, among this household type, the AFFH-T models annual transit trips for renters (transit_trips_rent). Neighborhoods are defined as census tracts. The LAI does not contain transit trip information for Puerto Rico.

Interpretation

Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the value, 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 AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 10.

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 (σ_c, σ_r, σ_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 tract.

Related AFFH-T Local Government, PHA and State Tables/Maps: Table 12; Map 13.

References:

http://www.epa.gov/ttn/atw/natamain/

C. Computing Indices by Protected Class

The AFFH-T provides index values documenting the extent to which members of different racial or ethnic groups have access or exposure to particular opportunity indicators. The AFFH-T provides a weighted average for a given protected 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 protected class, 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 the White population in the jurisdiction of 56.

Table 3. Example of Weighting of Low Poverty Index by Race in a Hypothetical Jurisdiction

Neighborhood	Dimension	White			Black		
	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)
Neighborhood	Dimension	White			Black		
	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)]
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 or ethnic group. For example, the low poverty index among the Black population in Jurisdiction X is 41. Using these indices, it is possible to identify disparities in access to opportunity across protected classes.

To account for differences in household income across groups, the AFFH-T also provides separate index values for persons below the federal poverty line, again breaking out values by racial or ethnic group. This will aid program participants in understanding whether there are disparities in access to opportunity indicators across protected class 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.

Appendix 5- Dallas, TX Small Area Fair Market Rents for 2019

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms				
ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75001	$1,070	$1,260	$1,530	$2,040	$2,650
75002	$1,050	$1,240	$1,510	$2,010	$2,610
75006	$860	$1,010	$1,230	$1,640	$2,130
75007	$920	$1,090	$1,320	$1,760	$2,290
75009	$810	$950	$1,160	$1,550	$2,010
75010	$1,000	$1,180	$1,430	$1,900	$2,480
75011	$830	$980	$1,190	$1,580	$2,060
75013	$1,190	$1,410	$1,710	$2,280	$2,960
75014	$800	$950	$1,150	$1,530	$1,990
75015	$800	$950	$1,150	$1,530	$1,990
75016	$800	$950	$1,150	$1,530	$1,990
75017	$800	$950	$1,150	$1,530	$1,990
75019	$1,040	$1,230	$1,500	$2,000	$2,600
75022	$1,250	$1,480	$1,800	$2,400	$3,120
75023	$1,020	$1,200	$1,460	$1,940	$2,530
75024	$1,250	$1,480	$1,800	$2,400	$3,120
75025	$1,080	$1,280	$1,550	$2,060	$2,680
75026	$970	$1,150	$1,400	$1,860	$2,420
75027	$870	$1,030	$1,250	$1,660	$2,160
75028	$1,250	$1,480	$1,800	$2,400	$3,120
75029	$870	$1,030	$1,250	$1,660	$2,160
75030	$800	$950	$1,150	$1,530	$1,990
75032	$1,130	$1,340	$1,630	$2,170	$2,820
75033	$890	$1,050	$1,280	$1,710	$2,220
75034	$1,100	$1,300	$1,580	$2,100	$2,740

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75035	$1,250	$1,480	$1,800	$2,400	$3,120
75038	$900	$1,060	$1,290	$1,720	$2,230
75039	$1,250	$1,480	$1,800	$2,400	$3,120
75040	$810	$960	$1,170	$1,560	$2,030
75041	$770	$910	$1,100	$1,470	$1,900
75042	$720	$850	$1,030	$1,370	$1,780
75043	$880	$1,050	$1,270	$1,690	$2,200
75044	$950	$1,120	$1,360	$1,810	$2,350
75045	$800	$950	$1,150	$1,530	$1,990
75046	$800	$950	$1,150	$1,530	$1,990
75047	$800	$950	$1,150	$1,530	$1,990
75048	$1,200	$1,420	$1,720	$2,290	$2,980
75049	$800	$950	$1,150	$1,530	$1,990
75050	$810	$950	$1,170	$1,560	$2,020
75051	$730	$860	$1,040	$1,390	$1,810
75052	$900	$1,050	$1,290	$1,730	$2,230
75053	$790	$920	$1,120	$1,510	$1,950
75054	$1,130	$1,280	$1,600	$2,190	$2,770
75056	$1,000	$1,180	$1,430	$1,900	$2,480
75057	$930	$1,090	$1,330	$1,770	$2,300
75058	$720	$840	$1,060	$1,440	$1,640
75060	$750	$890	$1,080	$1,440	$1,870
75061	$780	$920	$1,120	$1,490	$1,940
75062	$790	$940	$1,140	$1,520	$1,970
75063	$1,070	$1,270	$1,540	$2,050	$2,670
75065	$870	$1,030	$1,250	$1,660	$2,160

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75067	$930	$1,100	$1,340	$1,780	$2,320
75068	$1,250	$1,470	$1,790	$2,380	$3,100
75069	$880	$1,040	$1,260	$1,680	$2,180
75070	$1,190	$1,410	$1,710	$2,280	$2,960
75071	$1,060	$1,250	$1,520	$2,020	$2,630
75074	$930	$1,090	$1,330	$1,770	$2,300
75075	$900	$1,060	$1,290	$1,720	$2,230
75077	$1,020	$1,200	$1,460	$1,940	$2,530
75078	$1,130	$1,330	$1,620	$2,160	$2,810
75080	$900	$1,060	$1,290	$1,720	$2,230
75081	$1,070	$1,260	$1,530	$2,040	$2,650
75082	$1,100	$1,300	$1,580	$2,100	$2,740
75083	$800	$950	$1,150	$1,530	$1,990
75085	$800	$950	$1,150	$1,530	$1,990
75086	$970	$1,150	$1,400	$1,860	$2,420
75087	$1,080	$1,280	$1,550	$2,060	$2,680
75088	$1,180	$1,400	$1,700	$2,260	$2,940
75089	$1,250	$1,470	$1,790	$2,380	$3,100
75093	$1,130	$1,340	$1,630	$2,170	$2,820
75094	$1,250	$1,480	$1,800	$2,400	$3,120
75098	$1,030	$1,220	$1,480	$1,970	$2,560
75101	$680	$800	$970	$1,290	$1,680
75104	$1,040	$1,230	$1,490	$1,980	$2,580
75106	$800	$950	$1,150	$1,530	$1,990
75114	$970	$1,140	$1,390	$1,850	$2,410
75115	$870	$1,030	$1,250	$1,660	$2,160

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75116	$770	$910	$1,110	$1,480	$1,920
75119	$750	$890	$1,080	$1,440	$1,870
75123	$800	$950	$1,150	$1,530	$1,990
75125	$790	$940	$1,140	$1,520	$1,970
75126	$1,160	$1,370	$1,670	$2,220	$2,890
75132	$1,090	$1,290	$1,570	$2,090	$2,720
75134	$810	$960	$1,170	$1,560	$2,030
75135	$680	$810	$980	$1,310	$1,700
75137	$950	$1,130	$1,370	$1,820	$2,370
75138	$800	$950	$1,150	$1,530	$1,990
75141	$750	$890	$1,080	$1,440	$1,870
75142	$730	$860	$1,050	$1,400	$1,820
75143	$690	$810	$990	$1,320	$1,710
75146	$770	$910	$1,110	$1,480	$1,920
75147	$610	$720	$880	$1,170	$1,520
75149	$810	$960	$1,170	$1,560	$2,030
75150	$860	$1,010	$1,230	$1,640	$2,130
75152	$760	$900	$1,090	$1,450	$1,890
75154	$910	$1,070	$1,300	$1,730	$2,250
75156	$790	$930	$1,130	$1,510	$1,960
75157	$630	$760	$930	$1,250	$1,600
75158	$790	$940	$1,140	$1,520	$1,970
75159	$790	$930	$1,130	$1,510	$1,960
75160	$760	$900	$1,090	$1,450	$1,890
75161	$800	$950	$1,150	$1,530	$1,990
75164	$910	$1,080	$1,310	$1,740	$2,270

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75165	$780	$920	$1,120	$1,490	$1,940
75166	$1,240	$1,470	$1,780	$2,370	$3,080
75167	$1,220	$1,440	$1,750	$2,330	$3,030
75168	$810	$950	$1,160	$1,550	$2,010
75169	$670	$790	$960	$1,280	$1,660
75172	$610	$720	$880	$1,170	$1,520
75173	$970	$1,140	$1,390	$1,850	$2,410
75180	$790	$930	$1,130	$1,510	$1,960
75181	$1,250	$1,480	$1,800	$2,400	$3,120
75182	$1,250	$1,480	$1,800	$2,400	$3,120
75185	$800	$950	$1,150	$1,530	$1,990
75187	$800	$950	$1,150	$1,530	$1,990
75189	$950	$1,130	$1,370	$1,820	$2,370
75201	$1,250	$1,480	$1,800	$2,400	$3,120
75202	$1,200	$1,420	$1,720	$2,290	$2,980
75203	$640	$760	$920	$1,230	$1,590
75204	$1,250	$1,480	$1,800	$2,400	$3,120
75205	$1,200	$1,420	$1,730	$2,300	$3,000
75206	$1,080	$1,280	$1,550	$2,060	$2,680
75207	$1,250	$1,480	$1,800	$2,400	$3,120
75208	$770	$910	$1,100	$1,470	$1,900
75209	$1,040	$1,230	$1,490	$1,980	$2,580
75210	$580	$690	$840	$1,120	$1,450
75211	$710	$840	$1,020	$1,360	$1,770
75212	$650	$770	$940	$1,250	$1,630
75214	$870	$1,030	$1,250	$1,660	$2,160

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75215	$660	$780	$950	$1,270	$1,640
75216	$630	$750	$910	$1,210	$1,580
75217	$680	$810	$980	$1,310	$1,700
75218	$860	$1,020	$1,240	$1,650	$2,150
75219	$1,160	$1,370	$1,670	$2,220	$2,890
75220	$770	$910	$1,110	$1,480	$1,920
75221	$800	$950	$1,150	$1,530	$1,990
75222	$800	$950	$1,150	$1,530	$1,990
75223	$730	$860	$1,050	$1,400	$1,820
75224	$680	$810	$980	$1,310	$1,700
75225	$1,250	$1,480	$1,800	$2,400	$3,120
75226	$930	$1,100	$1,340	$1,780	$2,320
75227	$720	$850	$1,030	$1,370	$1,780
75228	$700	$830	$1,010	$1,350	$1,750
75229	$760	$900	$1,090	$1,450	$1,890
75230	$790	$930	$1,130	$1,510	$1,960
75231	$770	$910	$1,110	$1,480	$1,920
75232	$770	$910	$1,100	$1,470	$1,900
75233	$730	$860	$1,050	$1,400	$1,820
75234	$840	$1,000	$1,210	$1,610	$2,100
75235	$910	$1,080	$1,310	$1,740	$2,270
75236	$740	$880	$1,070	$1,430	$1,850
75237	$760	$900	$1,090	$1,450	$1,890
75238	$790	$930	$1,130	$1,510	$1,960
75240	$810	$950	$1,160	$1,550	$2,010
75241	$780	$920	$1,120	$1,490	$1,940

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75242	$800	$950	$1,150	$1,530	$1,990
75243	$790	$930	$1,130	$1,510	$1,960
75244	$1,040	$1,230	$1,500	$2,000	$2,600
75246	$600	$710	$860	$1,150	$1,490
75247	$700	$830	$1,010	$1,350	$1,750
75248	$1,030	$1,220	$1,480	$1,970	$2,560
75249	$1,040	$1,230	$1,500	$2,000	$2,600
75250	$800	$950	$1,150	$1,530	$1,990
75251	$1,040	$1,230	$1,490	$1,980	$2,580
75252	$870	$1,030	$1,250	$1,660	$2,160
75253	$790	$940	$1,140	$1,520	$1,970
75254	$930	$1,090	$1,330	$1,770	$2,300
75270	$800	$950	$1,150	$1,530	$1,990
75287	$950	$1,120	$1,360	$1,810	$2,350
75313	$800	$950	$1,150	$1,530	$1,990
75315	$800	$950	$1,150	$1,530	$1,990
75336	$800	$950	$1,150	$1,530	$1,990
75339	$800	$950	$1,150	$1,530	$1,990
75342	$800	$950	$1,150	$1,530	$1,990
75354	$800	$950	$1,150	$1,530	$1,990
75355	$800	$950	$1,150	$1,530	$1,990
75356	$800	$950	$1,150	$1,530	$1,990
75357	$800	$950	$1,150	$1,530	$1,990
75360	$800	$950	$1,150	$1,530	$1,990
75367	$800	$950	$1,150	$1,530	$1,990
75370	$970	$1,150	$1,400	$1,860	$2,420

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75371	$800	$950	$1,150	$1,530	$1,990
75372	$800	$950	$1,150	$1,530	$1,990
75374	$800	$950	$1,150	$1,530	$1,990
75376	$800	$950	$1,150	$1,530	$1,990
75378	$800	$950	$1,150	$1,530	$1,990
75379	$970	$1,150	$1,400	$1,860	$2,420
75380	$800	$950	$1,150	$1,530	$1,990
75381	$800	$950	$1,150	$1,530	$1,990
75382	$800	$950	$1,150	$1,530	$1,990
75390	$800	$950	$1,150	$1,530	$1,990
75401	$650	$770	$940	$1,250	$1,630
75402	$680	$800	$970	$1,290	$1,680
75403	$670	$790	$960	$1,280	$1,660
75404	$670	$790	$960	$1,280	$1,660
75407	$810	$950	$1,160	$1,550	$2,010
75409	$1,040	$1,230	$1,500	$2,000	$2,600
75422	$720	$860	$1,040	$1,390	$1,800
75423	$790	$930	$1,130	$1,510	$1,960
75424	$860	$1,010	$1,230	$1,640	$2,130
75428	$700	$830	$1,010	$1,350	$1,750
75442	$810	$950	$1,160	$1,550	$2,010
75448	$670	$790	$960	$1,280	$1,660
75449	$520	$620	$750	$1,000	$1,300
75452	$500	$590	$720	$960	$1,250
75453	$770	$910	$1,110	$1,480	$1,920
75454	$920	$1,090	$1,320	$1,760	$2,290

Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
75469	$670	$790	$960	$1,280	$1,660
75474	$630	$750	$910	$1,210	$1,580
75491	$640	$780	$950	$1,280	$1,640
75495	$660	$770	$970	$1,320	$1,480
75496	$580	$680	$830	$1,110	$1,440
76041	$810	$950	$1,160	$1,550	$2,010
76050	$620	$700	$880	$1,200	$1,530
76052	$1,130	$1,280	$1,590	$2,170	$2,750
76055	$810	$950	$1,160	$1,550	$2,010
76063	$950	$1,080	$1,350	$1,850	$2,340
76064	$610	$720	$870	$1,160	$1,510
76065	$910	$1,070	$1,300	$1,730	$2,250
76078	$810	$980	$1,160	$1,470	$1,680
76084	$650	$740	$920	$1,250	$1,590
76092	$760	$860	$1,070	$1,470	$1,860
76177	$1,060	$1,210	$1,510	$2,050	$2,610
76201	$790	$940	$1,140	$1,520	$1,970
76202	$870	$1,030	$1,250	$1,660	$2,160
76204	$870	$1,030	$1,250	$1,660	$2,160
76205	$850	$1,000	$1,220	$1,620	$2,110
76206	$870	$1,030	$1,250	$1,660	$2,160
76207	$910	$1,080	$1,310	$1,740	$2,270
76208	$870	$1,030	$1,250	$1,660	$2,160
76209	$740	$880	$1,070	$1,430	$1,850
76210	$1,000	$1,190	$1,440	$1,920	$2,490
76226	$1,250	$1,480	$1,800	$2,400	$3,120

ZIP Code	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Dallas, TX HUD Metro FMR Area Advisory Small Area FMRs By Unit Bedrooms					
76227	$1,250	$1,480	$1,800	$2,400	$3,120
76234	$750	$900	$1,070	$1,350	$1,520
76247	$1,020	$1,200	$1,460	$1,940	$2,530
76249	$1,030	$1,220	$1,480	$1,970	$2,560
76258	$880	$1,040	$1,270	$1,690	$2,190
76259	$920	$1,090	$1,320	$1,750	$2,280
76262	$930	$1,080	$1,320	$1,780	$2,290
76266	$910	$1,070	$1,300	$1,730	$2,250
76272	$650	$770	$940	$1,250	$1,630
76623	$810	$950	$1,160	$1,550	$2,010
76626	$810	$950	$1,160	$1,550	$2,010
76641	$810	$950	$1,160	$1,550	$2,010
76651	$600	$710	$860	$1,150	$1,490
76670	$700	$820	$1,000	$1,330	$1,730

Appendix 6- Public meeting notices

NOTICE OF
PUBLIC MEETINGS:

ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING CHOICE

The City of Dallas Office of Equity & Human Rights will be holding two Public Meetings in the month of June. These meetings are set to discuss and inform Dallas residents about the Analysis of Impediments to Fair Housing Choice (AI), as well as provide an opportunity for all to participate in the AI planning process.

Martin Luther King Center Building E June 4th, 10:00 AM - 11:30 AM, 2922 Martin Luther King Jr Blvd, Dallas, TX 75215	**West Dallas Multipurpose Center, June 5th, 6:00 PM - 7:30 PM Main Room, 2828 Fish Trap Road, Dallas, TX 75212**

AUXILIARY AID OR SERVICE NEEDED?

CONTACT FAIR HOUSING AND HUMAN RIGHTS OFFICE AT (214) 670-5689 OR TTY 1-800-735-2989. PLEASE CONTACT 48 HOURS PRIOR TO THE SCHEDULED HEARING.

If you have any questions about the meeting, please contact Jessica Esquivel, of the Office of Equity and Human Rights at (214) 670-5686.

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City of Dallas

Fair Housing

City of Dallas

PUBLIC HEARING
HUD Consolidated Plan FY 2019-20 through FY 2023-24 and FY 2019-20 HUD CONSOLIDATED PLAN PROGRAMS
NOTICE OF PUBLIC REVIEW AND COMMENT PERIOD FOR DALLAS
Five-Year HUD Consolidated Plan and FY 2019-20 ANNUAL ACTION PLAN

FOR THE FISCAL YEAR ENDING SEPTEMBER 30, 2020

The City of Dallas will submit its FY 2019-20 through FY 2023-24 Five-Year Consolidated Plan and FY 2019-20 Annual Action Plan on August 15, 2019 to the U.S. Department of Housing and Urban Development (HUD). The City's public notice for this Action Plan includes the various locations of services offered to low-to-moderate income families in the City of Dallas.

On May 8, 2019, City Council is scheduled to authorize a public hearing to be held on June 4 and 5, 2019, to receive citizen comments on the Proposed FY 2019-20 through FY 2023-24 Five-Year HUD
Consolidated Plan and the FY 2019-20 HUD Consolidated Plan Budget. The HUD Consolidated Plan Budget includes the following grants: Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grant, and Housing Opportunities for Persons with AIDS.

The purpose of the public hearing is to receive comments on the City's proposed HUD Consolidated Plan for FY 2019-20 through FY 2023-24, FY 2019-20 HUD Annual Action Plan, and FY 2019-20 HUD Consolidated Plan Budget. The public review and comment period will run through August 15, 2019. Final adoption is scheduled for August 16, 2019. Details of the proposed Five-Year Consolidated Plan and budget will be available at all City of Dallas libraries and the Office of Budget – Grant Administration Division.

Members of the public wishing to make comments are invited to attend the public hearing, which will be held not earlier than 10 a.m. June 4, 2019, in the Martin Luther King Center Building E, 2922 Martin Luther King Blvd.. Anyone interested in signing up in advance to speak at the public hearing may contact the City Secretary's Office at 214-670-5686.

Citizens in the Dallas Metropolitan area may submit written comments to the Office of Budget – Grant Administration Division, Dallas City Hall, 1500 Marilla Street, Room 4FS, Dallas, Texas 75201, or email ofscommunitydevelopment@dallascityhall.com on or before 5:00 p.m., on August 15, 2019. Written comments may also be faxed to 214-670-0741.

The City of Dallas will make "Reasonable Accommodations" to programs and/or other related activities to ensure that persons with disabilities have access to services and resources to create an equal opportunity to participate in all city related programs, services and activities. Anyone who requires an auxiliary aid or service to fully participate in or attend any meeting should notify the Office of Budget/Grants Administration Division at (214) 670-4550 or TTY 1-800-735-2989, forty-eight (48) hours prior to the scheduled meeting. Cualquier persona que requiera asistencia auxiliar o algún servicio para participar plenamente en, o para asistir a cualquier reunión del CDC, debe notificarlo a la oficina de Presupuesto / División de la Administración de Subvenciones al (214) 670-4550 o TTY 1-800-735-2989, cuarenta y ocho (48) horas antes de la reunión programada.