

**BOARD ACTION REQUEST**

**FAIR HOUSING, DATA MANAGEMENT, AND REPORTING**

**SEPTEMBER 5, 2019**

Presentation, discussion, and possible action to approve the Analysis of Impediments to Fair Housing Choice

**RECOMMENDED ACTION**

**WHEREAS**, the U.S. Department of Housing and Urban Development (HUD) requires the development of an Analysis of Impediments to Fair Housing Choice (AI) in accordance with the Affirmatively Furthering Fair Housing (AFFH) rule for HUD Community Planning and Development (CPD) funding recipients;

**WHEREAS**, the AI is required by HUD to be completed as a component of the Consolidated Planning process and serves as a basis for fair housing planning with an aim toward increasing housing choice and identifying any patterns of fair housing complaints;

**WHEREAS**, the AI is required because the Department operates several HUD Community Planning and Development (CPD) funded programs - the HOME Investment Partnerships Program (HOME), the National Housing Trust Fund (NHTF), and the Emergency Solutions Grants (ESG) programs;

**WHEREAS**, three other state agencies, the Texas General Land Office (GLO), Texas Department of State Health Services (DSHS), and Texas Department of Agriculture (TDA), are also recipients of CPD funds from HUD, and TDHCA leads the AI development and HUD Consolidated Planning process on behalf of the all Texas state agencies that receive CPD funds;

**WHEREAS**, at the TDHCA Board meeting of March 21, 2019, a Draft AI was approved to be released for public comment in compliance with the State's HUD-approved Citizen Participation Plan, and the public comment period for the Draft AI was open from March 25 through May 6, 2019, and 13 public hearings, one in each TDHCA State Service Region, were held during the public comment period;

**WHEREAS**, eight individuals gave comment at the public hearings, some of whom also submitted written comment via email; six additional email submissions of written comment were received; and two comments were received outside of the public comment period; and

**WHEREAS**, HUD does not require that the AI be submitted nor does HUD provide for an approval process for the AI, however HUD does require that the AI be available upon request and that a summary of the AI be provided as part of the State's Consolidated Annual Performance and Evaluation Report (CAPER) as required by the Consolidated Plan regulation at 24 CFR §91.520(a);

**NOW, therefore, it is hereby**

**RESOLVED**, that the Analysis of Impediments to Fair Housing Choice, in the form presented to this meeting, is hereby approved and the Executive Director and his designees are each hereby authorized, empowered and directed, for and on behalf of the Department, to publish on the Department's website the Analysis of Impediments to Fair Housing Choice and, in connection therewith, to make such non-substantive grammatical and technical changes as they deem necessary or advisable.

### **BACKGROUND**

The Analysis of Impediments to Fair Housing Choice (AI) is a process that recipients of U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) grant funds, such as states, local governments, and public housing agencies, undertake as part of their obligation to affirmatively further fair housing (AFFH) under the Fair Housing Act.

At the state level, the Texas Department of Housing and Community Affairs (Department), the Texas Department of Agriculture (TDA), the Texas General Land Office (GLO), and the Texas Department of State Health Services (DSHS), are responsible for carrying out the work of the AI because these agencies receive and disburse HUD Community Planning and Development (CPD) funds. TDHCA administers the HOME Investment Partnerships Program (HOME), the National Housing Trust Fund (NHTF), and the Emergency Solutions Grants (ESG) programs. TDA administers the Community Development Block Grant (CDBG), GLO administers CDBG Disaster Recovery, and DSHS administers the Housing Opportunities for Persons With AIDS (HOPWA) program. TDHCA leads the AI development and HUD Consolidated Planning process on behalf of the all Texas state agencies that receive CPD funds. The Texas Workforce Commission, Civil Rights Division (TWC-CRD) also participates in the process, providing training, technical assistance, and data on fair housing complaints.

#### *Consultation Process*

In accordance with its Citizen Participation Process identified in its Consolidated Plan, the State conducted more than 40 separate consultations in order to garner input for the initial draft Analysis of Impediments during summer 2018. These consultations took the form of conference calls, webinars, in-person meetings, public hearings, and participation in regularly-scheduled meetings with specific stakeholder groups. Written input was also accepted during the consultation period by email, mail, and fax. This robust early input and participation period provided great insight in the State of Texas' identification of impediments and in its ability to assess progress made toward previously identified

impediments to fair housing choice. Following this consultation period, at the TDHCA Board meeting of March 21, 2019, the Draft AI was approved to be released for public comment.

#### *Public Comment Period*

To garner input on the draft AI, a public comment period was open from March 25 through May 6, 2019. Notification of the public comment period and public hearings was announced by email distribution and published in the *Texas Register* on April 5, 2019. Thirteen public hearings were held, one in each TDHCA State Service Region. Notification of the public hearings was also released by TDHCA's Twitter and Facebook accounts and posted on the TDHCA Events Calendar and the TDHCA Public Comment Center (<https://www.tdhca.state.tx.us/events/index.jsp> and <http://www.tdhca.state.tx.us/public-comment.htm>).

Eight individuals gave comment at the public hearings. Staff also received six email submissions of written comments; however, some of the commenters at the public hearings also submitted written comment via email. Two comments were received outside of the public comment period. For a summary of public comment received and staff's reasoned responses, see Attachment A of this Board action and Chapter 1 of the AI. All written comments and transcripts of all hearings are provided as an Appendix to the AI.

#### *About the AI*

The AI both assesses where Texas is as a state as it relates to fair housing, and then identifies impediments and possible solutions, where applicable. This assessment is achieved by looking at a statewide overview and regional analysis of demographics and housing considerations, by reviewing statewide regulations and rules, by discussing and describing actions that have been taken and are currently being undertaken to affirmatively further fair housing by the state, by performing an assisted housing portfolio analysis and a lending analysis, and through an overview of fair housing complaints and cases. All of those topics together, presented chapter by chapter in the AI, lay the framework for the identification of statewide impediments. Recommended actions to address those identified impediments are then also provided. A separate chapter provides a review of specific considerations and actions that have been taken specifically as it relates to disaster recovery and response with CPD funds by the GLO.

The following five impediments, as detailed in Chapter 10 of the AI, represent five major themes on fair housing which the State determined based on input and analysis. There are opportunities within the five impediments for the Texas state agencies who receive HUD CPD funds to utilize those funds to alleviate, mitigate, or take steps to combat certain problems in accessing fair housing choice. While there may be other obstacles to fair housing choice in local areas or outside the purview of the State, these five impediments represent those issues for which the state agencies receiving CPD funds may have some influence to promote safe, decent, affordable, and fair housing.

Impediment 1: Not in My Backyard Syndrome (NIMBYism) can limit affordable housing development, which could limit housing choice for protected classes in some communities.

Impediment 2: There is a lack of understanding of and awareness of resources on fair housing law, rights, and duties available to local governments, stakeholders, and the public about fair housing requirements and programs to assist low-income residents and persons with disabilities.

Impediment 3: Protected classes may experience obstacles in accessing homeownership and lending products.

Impediment 4: The scarcity and location of accessible and visitable housing units limits fair housing choice for persons with disabilities.

Impediment 5: There are barriers for specific protected classes that may limit mobility and free housing choice.

Recommendations and proposed action steps to address to impediments identified above are listed below and are presented in detail in Chapter 11 of the AI.

Recommendation 1: Maximize accessible housing choice by promoting preservation and limiting displacement, continuing to encourage development in high opportunity areas, and encouraging creative, innovative solutions.

Recommendation 2: Increase the provision of educational resources to the developer, property manager, and tenant communities, and to the mortgage lending and realtor industries.

Recommendation 3: Reduce Stigmatizing Language and Practices

Recommendation 4: Actively Engage in the Enforcement of the Fair Housing Act

Recommendation 5: Work with Trade Organizations, Local Jurisdictions, and Regulatory Agencies for Mutual Benefit

In the development of the AI, the State has focused its efforts on those avenues where state agencies receiving HUD CPD funds could act within their authority, and with these HUD CPD resources. Once these impediments were identified, the state agencies receiving HUD CPD funds developed recommendations for ways to use these HUD CPD funds to alleviate obstacles. Over the next 5 years, until an updated fair housing document is required by HUD, the State intends to use the AI as a guide to take specific, measurable, actionable, reasonable, and time-bound actions to address the identified impediments that are likely to be achievable within current resource constraints.

#### *Submission and Availability of the AI*

While HUD does not require that the AI be submitted or approved, it does require that the AI be available upon request in the event of a complaint or as part of a routine monitoring. HUD also requires that a summary of the AI be provided as part of the State's 2020 Consolidated Annual Performance and Evaluation Report (CAPER), reporting on Program Year 2019, as required by the Consolidated Plan regulation at 24 CFR §91.520(a). The Department will place this completed AI on its website at <https://www.tdhca.state.tx.us/fair-housing/analysis-impediments.htm>.

Staff recommends approval of this action.

**Attachment A:** Summary of Public comment and Reasoned Response on the Draft State of Texas Analysis of Impediments to Fair Housing Choice (AI)

**Summary of Public comment and Reasoned Response on the Draft State of Texas Analysis of Impediments to Fair Housing Choice (AI)**

At the TDHCA Board meeting of March 21, 2019, the Draft AI was approved to be released for public comment. Two weeks prior to the TDHCA Board meeting, the Draft AI was posted to the TDHCA website and notification of this posting announced by email distribution to over 5,000 email addresses.

In accordance with the State's HUD approved Citizen Participation Plan, the public comment period for the Draft AI was open from March 25, 2019, to May 6, 2019. Notification of the public comment period and public hearings was announced by email distribution and published in the *Texas Register* on April 5, 2019. Thirteen public hearings were held, one in each TDHCA State Service Region. Notification of the public hearings was also released by TDHCA's Twitter and Facebook accounts and posted on the TDHCA Events Calendar (<https://www.tdhca.state.tx.us/events/index.jsp>) and the TDHCA Public Comment Center (<http://www.tdhca.state.tx.us/public-comment.htm>) webpages.

Eight individuals gave comment at the public hearings. Staff also received six email submissions of written comment; some of the commenters at the public hearings also submitted written comment via email. It should also be noted that one commenter at the public hearing in Midland did discuss HUD waivers with the Department, but did not specifically comment on the AI document or fair housing.

*Comment Received Outside the Public Comment Period*

One commenter submitted comment prior to the start of the public comment period. That commenter identified an error in a case citation of *Sims v. TDHCA*. While the case of *Sims v. TDHCA* had a correct citation, the State did, as a result, add some clarifying language to another related case citation in Chapter 8 to indicate that the case had originally been filed in the Western District of Louisiana. This change was already reflected in the final draft of the Analysis of Impediments that was approved by the TDHCA Board, and which was released for public comment. As a result, no changes to the Analysis of Impediments needed to be made to that version.

One comment was received after the public comment period closed; however three of the four topics addressed by this late comment were covered in other timely submitted public comments so are still addressed in the following summary. The fourth topic covered in this late submission was not germane to the AI.

**Summary of Comments and Staff Responses**

A summary of the comments received during the public comment period presented by topic, along with staff responses, is below.

## 1. Scope – Breadth of Agencies Covered

Four commenters indicated that the scope of the AI should not only focus on the agencies that administer the HUD CPD programs, but should be expanded to include a broader range of State and governmental agencies both in addressing impediments and in identifying actions to be taken. For example, one commenter indicated that the Texas Commission on Environmental Quality (TCEQ) should be included to consider environmental impacts of low income minority populations residing near industrial activity, and another felt that the Texas Department of Transportation (TXDOT) or the Texas Transportation Commission should be included so that regional mobility planning could be considered during housing development planning. Another agency noted as not having been involved in the development of the AI that should have been is the Texas Department of Emergency Management (TDEM).

One comment also noted that AFFH is not confined to expanding housing opportunities and encompasses remedying historical disinvestment and discrimination, and addressing structural factors that have deprived protected classes in Texas of access to opportunity and meaningful housing choice, and perpetuated segregation.

One commenter noted that such a narrow scope does not allow adequate consideration of all the factors in our state that influence fair housing; another suggests that the list of impediments and actions steps to address those impediments is incomplete by nature of excluding the broader scope of agencies. A commenter takes this further and suggests that if in fact the impediments and action list do not include this broader scope, then the AI is incomplete and cannot support the Department's AFFH certification, thus creating a basis for HUD to disapprove any Consolidated Plan submitted. One other comment related to scope critiqued the fact that the list of impediments is essentially the same as the list of issues for the 2013 AI.

*(Comments made by: Madison Sloan, Texas Appleseed; Demetria McCain, Inclusive Communities Project; Amelia Adams, Texas Housers; Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff response: In the development of the draft AI, the State used the HUD Fair Housing Planning Guide (FHPG) as a reference guide for much of the content and format. However, it should be emphasized that the FHPG is merely guidance for the AI, and is not a promulgated regulation.

In 2018, HUD promulgated two important Advance Notices of Proposed Rulemaking (ANPR): one requested comment on the changes to its disparate impact rule necessitated by the U.S. Supreme Court's ruling in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135

S. Ct. 2507 (2015) (“*ICP*”). The resulting new disparate impact rule proposed by HUD (currently out for public comment at the time of this response) will drastically change the HUD standard of what constitutes actionable disparate impact discrimination, and how it can be prosecuted under the FHA. The second ANPR was a broad-reaching request for comment on changes to the entire AFFH rule in light of this landmark Supreme Court opinion. Accordingly, the AI is most appropriately conformed to the current Supreme Court interpretation of the scope of the Fair Housing Act, as opposed to HUD’s decades-old planning guide or its soon-to-be-superseded rules that HUD has already taken steps to rectify to conform with the Supreme Court’s opinion.

In *ICP*, the Court adopted an exacting standard for disparate-impact claims under the FHA. At the *prima facie* stage, a disparate-impact claim requires the plaintiff identify a particular facially neutral practice, prove a robust causal connection between the identified practice and the claimed disparate impact, and demonstrate that the disparate impact causes a barrier to housing. *See id.* at 2523. Thus, in the disparate-impact context, the FHA prohibits only specific, identified practices that cause a statistical disparity regarding a classification protected under the Fair Housing Act and create a barrier to housing for that protected class. *See id.*; *see also id.* at 2521 (stating the “[t]he FHA . . . was enacted to eradicate discriminatory practices”). Notably, the Court found that the FHA may be used to remove artificial, arbitrary, and unnecessary barriers to housing, but stated, pointedly, that it “is not an instrument to force housing authorities to reorder their priorities,” nor does it “decree a particular vision of urban development.” *Id.* at 2522, 2523. It follows that any analysis of impediments to fair housing would use the current legal standard of what can be enforced under the FHA (as well as whether an identified impediment is within the control of the State) as the basis for its plan.

Regarding certain commenters’ requests to include all State agencies in the AI, the FHPG states: “(a)lthough the grantee’s AFFH obligation arises in connection with the receipt of Federal funding, its AFFH obligation is not restricted to the design and operation of HUD funded programs at the State or local level.”<sup>1</sup> Indeed, while the inclusion of a broader range of State agencies is “not restricted” in the AI, it is quite notably also not required. No law or regulation exists that requires states to expand the scope of a state AI beyond the programs that receive specific types of HUD CPD funding.

It is important to note that none of the Texas state agencies that administer these specific types of HUD CPD funding have the statutory authority or ability to direct or influence policy at other Texas state agencies. To suggest that the AFFH certification signed by TDHCA could only be accurately and truthfully signed if TDHCA exceeds its statutory scope by presuming the ability to set policy within other state agencies, except as specifically allowed for under state legislation or as agreed to by other state agencies

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<sup>1</sup> HUD Fair Housing Planning Guide, page 1-3.

that receive specific types of HUD CPD funding, would be legally remiss. Therefore, while TDHCA understands that many things outside of its control may affect how low income Texans seek and find housing, TDHCA disagrees that all of those issues should fall within the scope of this document. No changes have been made to the AI as a result of these comments.

As it relates to the comment that the impediments appear to repeat the same issues from the prior AI, the State addressed the reason for this in the AI:

*“In developing the specific impediments for the draft AI, the Department considered past impediments and whether they continued to exist, the trends and observations seen through the earlier chapters in this document, as well as new input received during consultations. Because the issues addressed in past AIs were broad and pervasive challenges, and continued to be reiterated and reaffirmed across many input sessions, the state does not consider those past impediments to be resolved. However, based on newer insights and input those impediment statements have been revised to make them as current and relevant as possible.”*

## **2. Scope – Local and Regional Coverage**

One commenter indicated that the scope of the AI should be focused more locally to propose region-specific solutions and implementation processes. They suggest that the AI should address how TDHCA will work with regulatory agencies and local jurisdictions within each of the state’s 13 regions. They also suggest that the State should work with units of government that receive these types of HUD CPD funding on the development of their AIs. One commenter also noted that activities of the North Central Texas Council of Governments, who use their funds for infrastructure, also play a role in housing, and could better address environmental justice issues.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff response: The State does not agree that the development of local and regional AI documents is part of its responsibility; those activities are the responsibility of local units of government themselves. The commenter admittedly notes that it is because their local PJ, the City of Lubbock, has not performed an AI that they feel the Department should now step in. The process for developing a state level AI is different from the process that local municipalities and regional PJs use to develop their AI or Assessment of Fair Housing (AFH), whichever is required by HUD for a particular local entity. However, in an effort to enhance the actions identified to support Recommendation 5, regarding Work with Trade Organizations, Local Jurisdictions, and Regulatory Agencies for Mutual Benefit, the State has added language regarding coordination with units of government required to perform an AI, and sharing of best practices.



### **3. Scope – Historical Perspective**

One commenter suggested that the AI should include a detailed historical account of the reasons for current patterns of discrimination and segregation. They posit that only through understanding the historic patterns of segregation can impediments to fair housing be understood; without explaining the history in the AI, the document will be weak in overcoming barriers. They appear to suggest that each region’s analysis section should cover that region’s history and background. Further, comment criticized the lack of more detailed statistical and regional patterns of historical and current segregation or race-related impediments.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: As stated, above, the opinion in the ICP case makes clear that the FHA can be used to challenge current policies that are demonstrated to have a robust causal connection to a disparately impacting barrier to fair housing. As important as a city’s history may be to its citizens, it is not particularly relevant to the legal analysis of whether a current policy is responsible for creating a barrier to fair housing. After all, only current policies could be enjoined as a remedy – not historical policies. No changes to the Analysis of Impediments have been made as a result of these comments.

### **4. Source of Income Discrimination**

Six comments indicated that source of income discrimination, specifically discrimination against Housing Choice Voucher holders, was an obstacle in protecting tenants from discrimination. More specifically, several commenters criticize the state law that bars municipalities from enacting local ordinances that would protect tenants from discrimination based on source of income. These comments also pointed to the correlation between race and ethnicity and status as a Housing Choice Voucher holder. Commenters stated that this could be considered grounds for a claim of disparate impact and suggested the state look at the recent report published by the Urban Institute.

*(Sandy Rollins, Texas Tenant’s Union; Owen Wilson Chavez, Child Poverty Action Lab; Demetria McCain, Inclusive Communities Project; Maddison Sloan, Texas Appleseed; Amelia Adams, Texas Housers; Christa Walikonis, Disability Rights Texas)*

Staff Response: Neither source of income nor poverty status are protected classes under the Federal Fair Housing Act or the Texas Fair Housing Act. While the Urban Institute’s study on Housing Choice Voucher denials does support that in the metropolitan areas tested many landlords do not accept vouchers, the study only included one city in Texas (Fort Worth) and does not offer a full picture of the situation in the state. Moreover, the United States Court of Appeals for the Fifth Circuit upheld a previous District Court ruling in *Inclusive Communities Project v. Lincoln Property Company et al.*, 17-10943 (5<sup>th</sup> Cir. July 16, 2019) and found that refusal to participate in the Housing Choice Voucher Program did not constitute

disparate impact or disparate treatment. Additionally, it is not under the jurisdiction of any of the State agencies who receive HUD CPD funds to mandate that private market landlords accept Housing Choice Vouchers. For the portfolio for which TDHCA does have authority, TDHCA requires any Development that receives Low Income Housing Tax Credits, Bonds, or Direct Loan funds from TDHCA to accept Housing Choice Vouchers, HOME Tenant Based Rental Assistance, or other federal, state, or local government rental assistance program. See 10 TAC §10.610(b)(2)(B). The Texas Legislature, in 2015, banned local jurisdictions from passing protections against source of income discrimination.<sup>2</sup> No changes to the Analysis of Impediments have been made as a result of these comments.

## **5. Income Levels**

One commenter noted that programs that focus affordable housing at 80% of area median income are not often creating units that are below market rents; they are often at or above market rents. To serve those most in need, who are often protected classes, programs should be targeted to lower area median income levels.

*(Sandy Rollins, Texas Tenants Union)*

Staff Response: The Department agrees that program limits do not always result in rent levels that are achievable for all low income households. Many of TDHCA's programs do serve households well below 80% of area median income. No revision to the AI is suggested.

## **6. Persons with Disability**

One commenter appreciated the inclusion of the impediments faced by persons with disabilities in the Draft AI. They stated that they felt the Department's representation of disability issues made good use of the most recent data, and that the Department made clear the connection between disability and poverty, and their combined effects on finding housing. They also were pleased to see the Department address service animals and possible training in that regard.

*(Christa Walikonis, Disability Rights Texas)*

Staff Response: Staff appreciates the feedback, and no revision to the AI is suggested as a result of this comment.

## **7. TDHCA Home Purchase Programs**

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<sup>2</sup> ICP sued Texas Governor Greg Abbott over the enforcement of this law, and the case was dismissed on jurisdictional grounds. See *ICP v. Abbott*, No. 3:2017cv00440 (N.D. Tex. 2018)(S. Fitzwater) Doc. 63 (Memorandum Opinion and Order).

One commenter made comments regarding the State of Texas homebuyer and homeownership programs. Specifically, comment was received that participation in TDHCA's homeownership and homebuyer programs was low in the City of Lubbock, and that TDHCA did not have enough low income homebuyer activities. Furthermore, the commenter suggested that the Analysis of Impediments should include a detailed plan for better educating the community on resources available to help lower income households.

*(Michael Bates, Northwest Texas Legal Aid/Alliance of East Lubbock Neighborhood Associations)*

Staff Response: TDHCA recognizes that there may be a lack of awareness of the homeowner and homebuyer programs that the agency provides. For this reason, the State proposed Recommendation 2 which is to increase the provision of educational resources to the developer, property manager, and tenant communities, and to the mortgage lending and realtor industries. Specifically, the state plans to provide and promote training for nonprofit and realtor groups who work with low income households on TDHCA's homeownership and homebuyer programs. Additionally, TDHCA will reach out to credit counseling agencies to provide targeted outreach and identify areas where there may be a shortage of HUD certified housing counseling organizations. Additionally, Recommendation 5, which increases collaboration with trade groups, local jurisdictions, and regulatory agencies, specifically mentions targeting outreach and collaboration with groups that can help low income Texans learn about and access TDHCA homebuyer programs. No changes have been made to the Analysis of Impediments as a result of these comments.

## **8. Lending Activities and Credit History**

One comment indicated that the Analysis of Impediments ignored evidence of lending discrimination and suggests that the state perform testing to find said discrimination.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The State disagrees with this comment, specifically the characterization that evidence was ignored. Chapter 7 of the Analysis of Impediments presented a detailed review of lending in the State of Texas. In this chapter, the State identifies differences in home mortgage loan denial rates for several different protected classes: sex, race, and national origin. Furthermore, the State further analyzed these differences by income grouping to add statistical controls and increase the generalizability of the analysis. Additionally, the State identified differences in the primary reasons given for loan denials between races and national origins. The State concludes that the data available is insufficient to establish a causal relationship statewide between an applicant's sex, race, or national origin, and their denial for a home mortgage loan. This insufficient data problem is echoed by many studies; conclusions cannot be determined on the causality of loan denials without data on credit scores of applicants, actual debt-to-income ratios of applicants, and the formulae used by credit agencies and

lending institutions to determine credit score and credit worthiness. The State does suggest that greater transparency from lenders and credit agencies on their lending decisions and credit worthiness decisions could shed light on what, if any, causal mechanisms account for denial rates that vary across protected classes. No changes have been made to the Analysis of Impediments as a result of this comment. One further comment objected to the framing of credit history as a problem attributable solely to housing seekers.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The State does not agree with the characterization of credit history as a problem only attributable to housing seekers. In fact, the State identified the lack of clarity and transparency used by lenders to calculate credit score and evaluate credit history as the reason the State is unable to identify a causal mechanism statewide for the identified disparities in lending denial rates and reasons for those denials. Those same factors may affect those seeking rental housing; however, the lacking data still precludes a means of establishing causality statewide. No changes have been made to the Analysis of Impediments as a result of this comment.

One comment requested that the AI should also address the lack of private lending products available to low income households.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: The State agencies that receive these HUD CPD funds do not have the authority to force or require private institutions that engage in lending to extend products to low income households. To help in addressing gaps in the private lending market, TDHCA does offer programs for low-income households through the My First Texas Home program, as well as several homeownership related products through its HOME, Bootstrap, and Self-Help Center Programs. No changes have been made to the Analysis of Impediments based upon this comment.

One other comment on this topic specifically noted the lack of Federal Housing Administration loans in the City of Lubbock.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: Federal Housing Administration loans are federal products that are administered through private lenders. This loan program is not something overseen by TDHCA, nor does TDHCA dictate or control Federal Housing Administration policies. As a result, TDHCA is unable to take any action regarding these loans. No changes have been made to the Analysis of Impediments as a result of this comment.

## **9. Transportation and Increasing Mobility**

One commenter noted a strong tie between public transportation and fair housing choice, and suggested that the AI include incorporating regional public transit planning, for areas of the state such as the City of Lubbock. Additionally, the commenter remarked on the state of public transit in Lubbock being ineffective and the siting of LIHTC properties in Lubbock being too far from transit services. The commenter suggested said that Lubbock needs State coordination to increase mobility. The commenter also suggests that the data provided regarding commute distances and times, because they are provided at the broader regional level, give a perspective that those who deal with housing barriers do not have mobility barriers.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: The State is aware that individual cities and regions have their own critical issues to face and their own unique situations. However, the State of Texas Analysis of Impediments is focused on activities stemming from the State’s allocation of HUD CPD funds. Because of the limited scope and amount of these funds, and the statewide breadth of the AI, the State is not in a position to generate data, information, and mobility planning services for every city, county, and region in Texas. Additionally, any jurisdiction receiving these CPD funds has the duty to produce an AI. Lubbock, as a recipient of these funds, will have the ability to focus on the issues that are specific to this region in its own AI or AFH per HUD guidance.

In Chapter 5 of the Analysis of Impediments, the State performed analysis on the transportation situation of each TDHCA service region by way of commute times and inflow and outflow of workers; this data was not intended to imply that no mobility barriers exist, but only to show the relative commute data from region to region. While the amount and availability of public transportation will vary by city, none of the state agencies receiving these CPD funds have the authority to make any mandates to local transit authorities. In an area of policy that TDHCA can influence, TDHCA’s Qualified Allocation Plan and Uniform Multifamily Rules have historically incentivized siting Multifamily properties near public transit opportunities. No changes have been made to the Analysis of Impediments as a result of this comment.

#### **10. Data in the AI.**

Several comments stated that the data used in the Analysis of Impediments should have included other groups, used different definitions or provided more analysis as provided more specifically below.

One commenter noted that the definition of “disability” used in the analyses in the AI is not the same as the definition of “disability” as understood in the Fair Housing Act.

*(Jason Howell, Recovery People)*

Staff Response: The State agrees that the FHA definition is not used in the data presented. Unfortunately, the FHA definition of “disability” is not universally used and does not readily translate for the scale of the data that was needed and the broad range of data sources required to complete this document. For

instance, the American Community Survey does not report data on the type of disability in line with the definition offered by the FHA. As the ACS comprised a large portion of the data used and required, it was not possible to use the definition given by the FHA. In response to this comment, the State will add a disclaimer at the beginnings of Chapter 2 and Chapter 5 explaining that the FHA definition of “disability” is broader than the definitions used in the ACS data.

Another commenter indicated that the Analysis of Impediments should include individuals in recovery in the Special Needs Populations segment of Chapter 2.

*(Jason Howell, Recovery People)*

Staff Response: The State is not aware of statewide data that would reliably capture this population. Additionally the State, for consistency, used the same Special Needs Populations in the AI as are contained in other related Department documents such as the State of Texas Low Income Housing Plan and Report (SLIHP). Populations that the Department considers to be Special Needs are required to be in the SLIHP in accordance with §2306.0721(c)(1) of the Tex. Gov’t Code. While the State does recognize that individuals in recovery are a subset of persons with a substance use disorder, it is not a specifically listed group in the aforementioned Tex. Gov’t Code. No changes have been made to the Analysis of Impediments in response to this comment.

Two other comments recommended that data reported in the Analysis of Impediments should be broken out by race and ethnicity, especially in Chapters 2 and 5.

*(Demetria McCain, Inclusive Communities Project)*

Staff Response: Staff agrees that because race and national origin are protected classes, these are vital categories for data analysis. Unfortunately, the State is limited by the availability of data and the constraints of the data used. For instance, the HUD Comprehensive Housing Affordability Strategy data (CHAS) does not include race and national origin in all of their tables. Without this, the State is unable to create breakouts by race and national origin for data on housing problems such as cost burden, lacking complete kitchen and plumbing, and overcrowding. Wherever possible and germane, the State has tried to include data on any protected classes other than religion, which had a very low incidence of complaints. No changes were made to the Analysis of Impediments based on this comment.

## **11. Boarding Home and Group Home Terminology Usage**

One commenter indicated that the Analysis of Impediments did not accurately define the term “boarding home” and used the term “group home” too loosely.

*(Jason Howell, Recovery People)*

Staff Response: The state appreciates this comment and has made changes to keep the use of terminology more consistent when discussing group home facilities. Staff used the HUD and Department of Justice Joint Statement on State and Local Land Use Laws and Practices and the Application of the Fair Housing Act as a guide for how to use the proper terminology. However, staff would note that the AI did correctly define boarding home per §260.001 of the Tex. Health and Safety Code.

## **12. State Laws**

One commenter broadly addressed their concern over this section (Chapter 3) on state laws and regulations, and suggested that the list of state laws and regulations described in Chapter 3 do not account for the disparate impact of facially neutral laws on protected classes, and that the chapter “glaringly” excludes several state laws with discriminatory effects that may have been passed with discriminatory motives. *(Note: the specific laws noted by this commenter are described below.)* This commenter also noted that the AI fails to discuss state law as it relates to the QAP for the LIHTC program.

*(Madison Sloan, Texas Appleseed)*

More specifically, two comments stated that the State should identify the state statute that bans inclusionary zoning as an impediment. Inclusionary zoning refers to the practice of cities requiring or incentivizing developers to set aside a portion of new housing units produced for “below market rate” (BMR). In 2015, the Texas State Legislature passed legislation that disallowed Texas municipalities from engaging in inclusionary zoning. One of those commenters also noted that Chapter 3 did not include the state statute banning linkage fees. Texas Local Gov’t Code §250.008 states that a political subdivision may not adopt or enforce a charter provision, ordinance, order, or other regulation that imposes, directly or indirectly, a fee on new construction for the purposes of offsetting the cost or rent of any unit of residential housing.

One comment also suggested that the State statute that requires any housing project by a Public Housing Authority to have a meeting in order for the project to begin construction, should be identified as an impediment. The law treats “public housing as a more noxious use than a major source of pollution...” Further, the commenter states that the signage requirements and meeting requirements for those meetings allow for NIMBYism.

This commenter also noted that state law parameters on non-entitlement CDBG programs can also have a disparate impact.

*(Madison Sloan, Texas Appleseed; Demetria McCain, Inclusive Communities Project)*

Staff Response: As previously stated, the opinion of the Supreme Court in *ICP* governs how a disparate impact theory of discrimination may be recognized under the FHA. Regarding a challenge to a state

policy, it is the claimant's burden of proof and persuasion to make a *prima facie* showing of discrimination (a demonstration of a robust causal link between the policy and a disparately impacting barrier to fair housing). Only then does the burden shift to the state to provide an explanation of the policy's rationale: "housing authorities and private developers [are provided] leeway to state and explain the valid interest served by their policies." *ICP*, 135 S. Ct. at 2522. Thereafter, the claimant then resumes their burden of proof and persuasion to rebut this explanation, and to satisfy the formidable legal standard that challenged policies "are not contrary to the disparate-impact requirement unless they are artificial, arbitrary, and unnecessary barriers." *ICP*, 135 S. Ct. at 2524 (internal citation and quotation omitted).

The Commenters would have TDHCA reverse this burden-shifting analysis, and have the Department presume the illegitimacy of a state law on the basis of the Commenter's suspicion that it was tainted at some point in the legislative process with "discriminatory motives." This, despite the fact that TDHCA (as an executive agency of the State of Texas) has no legal authority to simply ignore state law, or presume a lack of constitutionality, reasonableness, or public interest in any duly-enacted statute.<sup>3</sup>

Regarding the exclusion of the laws that relate to the Housing Tax Credit programs, as discussed earlier in the section on scope, the Department does not believe the LIHTC Program is subject to AI. Moreover, the elements of the QAP that were questioned by the Commenter are required by state statute to be in the QAP, raising the above-discussed issues of the burden-shifting analysis for showing a disparate impact, as well as TDHCA's lack of authority to manipulate state law. No changes to the AI are made in response to these comments.

### **13. Impediment One**

One comment agreed with the inclusion of the first impediment regarding Not in My Backyard Syndrome (NIMBYism). It was criticized that several state laws might be considered as enabling and encouraging NIMBYism, which was addressed in the item above. Another commenter noted that they agreed with the inclusion of this impediment, but thought more detail on NIMBYism should be provided.

*(Madison Sloan, Texas Appleseed; Johanna Rohan, Aging and Disability Resource Center)*

Staff Response: The State appreciates these comments. Staff did not feel that further additions on the subject of NIMBYism were needed. No changes have been made to the Analysis of Impediments as a result of this comment.

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<sup>3</sup> See, e.g. Tex. Gov't Code §311.021 (Intention in Enactment of Statutes)



#### **14. Impediment Two**

One comment suggested that impediment 2, relating to a lack of understanding and awareness of resources on fair housing, should be reformulated to include reference to local government officials. Currently the impediment focuses on education and outreach to housing providers and housing seekers.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The State agrees that outreach under Impediment Two should include local government and in the title to the Impediment specifies local government as part of those that warrant ongoing awareness.

Another commenter addressed a specific facet of Impediment Two, and an area of input received, relating to the negative impact that criminal background criteria have on seeking affordable housing, and that protected classes are impacted by this. Inconsistent provider policies, unreasonable look-back periods and challenges with reading criminal histories were all concerns. This commenter also noted concern with helping those that have been formerly incarcerated with accessing disability benefits.

*(Natalie Burtzos)*

Staff Response: Staff appreciates this comment, which further supports this issue as summarized in the AI. The Department is addressing this issue through Recommendation Two.

#### **15. Impediment Four**

One commenter indicated that the fourth identified impediment regarding the lack of accessible and visitable housing should be reworded to include issues with the location of accessible and visitable housing. The commenter did note that in the description of the impediment in the AI text the State did address location as part of the impediment.

*(Madison Sloan, Texas Appleseed)*

Staff Response: Impediment 4 has been revised to include the location of accessible and visitable housing, since location of accessible and visitable housing is discussed in the description of Impediment 4.

#### **16. List of Impediments**

Discussed in part already under Item One, relating to Scope, one commenter suggested that the list of impediments in Chapter 10 was incomplete. In particular, the commenter cited a bill regarding eviction history distribution when the eviction is dismissed, a lack of regulation of predatory lending, and a lack of regulation on insurance denials as examples of issues to be included with the fifth impediment. The

commenter also suggested adding deliberate zoning decisions and environmental hazards as further examples.

*(Madison Sloan, Texas Appleseed)*

Staff Response: While these issues may be perceived as having an effect on where low income households locate housing, these are not issues that the agencies receiving HUD CPD funds have statutory authority to effect. Therefore, no changes have been made to the AI as a result of these comments.

### **17. Public Comment Process**

Two comments suggested that the Analysis of Impediments should include a list of the participants in the public comment process.

*(Demetria McCain, Inclusive Communities Project; Owen Wilson Chavez, Child Action Poverty Lab)*

Staff Response: The state conducted robust early public consultation for the initial Draft Analysis of Impediments in accordance with 24 CFR §91.110 and the State's HUD-approved Citizen Participation Plan. This initial consultation process, conducted prior to and outside of the official public comment process, is documented in Chapter 1. All public comment received during the public comment period of the draft AI is considered public. Those public comments will be summarized in Chapter 1 and given reasoned response, and the comments themselves will be provided in an appendix as well as transcripts of all hearings, in accordance with the State's HUD-approved Citizen Participation Plan. While this was already the plan for handling comment received, the State appreciates these comments.

Two commenters critiqued the public comment process itself. These comments suggested that the State needed to give more notice to the public regarding the AI process and public comment period. Additionally, these comments indicated that the State should have utilized methods other than mass emails to solicit input for the AI.

*(Demetria McCain, Inclusive Communities Project; Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: The State appreciates these comments. While no changes have been made to the document itself as a result of these comments, the State will use these suggestions for outreach as it takes actions under Recommendations 3 and 5 to educate and work with stakeholders on implementing action, in the preparation of future Analyses of Impediments, and possibly other documents as appropriate. Changes to Recommendation 5 have been made as a result of these comments to indicate that the State will invite more local entities to join its fair housing communications distribution list.

### **18. Low Income Housing Tax Credits**

Six comments discussed the importance of the process in the QAP for considering undesirable site and neighborhood features as an essential step in ensuring that new affordable housing does not perpetuate the concentration of affordable housing and of people of color who disproportionately comprise the tenants in the developments. The comment indicated that, during the 9% HTC application process specifically related to evaluating the undesirable site and neighborhood standards associated with specific properties, “while the TDHCA staff has routinely noted applications that fail to meet the criteria for an appropriate location, the [Governing Board] of TDHCA has waived the negative area determination and restored the application for consideration. This happens routinely to the point of rendering the criteria irrelevant. This segregative practice is now a major impediment to Fair Housing in Texas and must be identified as such in the AI and an action step proposed to restrain these board actions.” One of the commenters also noted that there is no evaluation in the AI of whether there are patterns of discretionary decision-making that override QAP requirements, and that the program continues to be ineffective in providing low-income children with access to high-performing schools.

*(Amelia Adams, Texas Housers; Madison Sloan, Texas Appleseed)*

Staff Response: As a general legal matter, the question of whether the board’s “discretion” in the interpretation and application of its rules, on its own, can serve as the basis for a discrimination suit under the FHA has already been answered in the negative. Following the Supreme Court’s remand of the ICP case to the District Court, the plaintiff advanced this as their primary theory. The District court thoroughly rejected it:

By relying simply on TDHCA’s exercise of discretion in awarding tax credits, ICP has not isolated and identified the specific practice that caused the disparity in the location of low-income housing. Like the plaintiff in *Anderson*, ICP has pointed to the “cumulative effects” of TDHCA’s decision-making process over a multi-year period. ICP cannot rely on this generalized policy of discretion to prove disparate impact.

...

Finally, ICP maintains that TDHCA has used its discretion to approve projects located in areas of slum and blight, with high crime rates, adverse environmental conditions, and where there is a high concentration of LIHTC units. TDHCA responds that ICP’s concerns are exaggerated, and that ICP has not demonstrated that the decision to approve projects in certain areas causes a statistically-significant disparity. ICP has not established that TDHCA’s approval

of projects in areas of slum and blight caused a racially disparate impact, and ICP does not seek a constitutionally-permissible remedy.<sup>4</sup>

The statement by commenter that pairs the review of individual applications and the limited use of discretion, and then labels determinations as a “segregative practice” is without logical or factual foundation. It should be noted that in many cases exceptions to neighborhood risk factors made by the Board are related to rehabilitation activities – in other words, if the exception were not granted, the low income households residing in the affected properties would have continued to live at the property *without* rehabilitation and improved conditions. But in all cases, the record before the board will reflect the individual application’s specific circumstances that would justify the request before the Board, and often contains pleas from members of the community who are seeking the low-income housing resources in their neighborhood. No changes to the Analysis of Impediments have been made as a result of these comments.

Two of these comments related to TDHCA’s strategy of “balancing” the siting of new affordable housing against the preservation of aging housing or housing that is nearing the end of its affordability period. These comments specifically asked the State to conduct an analysis of LIHTC projects and siting to determine if the program helps to locate affordable housing in high opportunity areas. Two further comments indicated that the current definition of “Concentrated Community Revitalization Plans” in the LIHTC program is not clear and is too easy to circumvent. Finally, two comments asked TDHCA and the State to evaluate the impact of LIHTC sites that were near industrial areas and suggested that industrial zoning might be concentrated around minority neighborhoods.

*(Madison Sloan, Texas Appleseed; Amelia Adams, Texas Housers; Demetria McCain, Inclusive Communities Project; Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: Tax Code requires that the QAP provide a priority for developments associated with community revitalization efforts; over the last several years, revisions to this section of the QAP have been made to try to ensure that they are not easy to circumvent. TDHCA’s Qualified Allocation Plan has a point structure built to incentivize developments from being sited near undesirable site and neighborhood features such as heavy industry. Further, the State, maintains the strategy of balancing new development with preservation in order to maximize affordable housing stock without displacing residents from affordable units and improving the conditions of aging stock. Finally, in Recommendation 1, the State includes encouraging development in high opportunity areas. This recommendation also

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<sup>4</sup> *ICP v. TDHCA*, No 3:08-CV-0546, 2016 WL 4494322 (N.D. Tex. Aug. 26, 2016)

includes 9 action steps that the State can take to work toward this goal. No changes have been made to the Analysis of Impediments as a result of these comments.

Three comments related to letters of support or opposition from officials. One comment suggested that consideration should be given to the way local officials have used their power to support – or not – tax credit applications. These letters can effectively act as veto power. Another commenter noted that both local official and state official letters can stop a project completely and that this should be addressed as part of the cause of the NIMBYism that occurs.

*(Amelia Adams, Texas Housers; Christa Walikonis, Disability Rights Texas; Demetria McCain, Inclusive Communities Project)*

Staff Response: The requirement for the QAP to provide points for local government support is a state statutory requirement (Tex. Gov't Code §2306.6710(b)(1)(B)) therefore it must be included in the QAP. However, in an effort to highlight fair housing to local governments, the QAP states in this scoring item: "A municipality or county should consult its own staff and legal counsel as to whether its handling of their actions regarding such resolution(s) are consistent with Fair Housing laws as they may apply, including, as applicable, consistency with any Fair Housing Activity Statement-Texas (FHAAT) form on file, any current Analysis of Impediments to Fair Housing Choice, or any current plans such as one year action plans or five year consolidated plans for HUD block grant funds, such as HOME or CDBG funds."

### **19. Fair Housing Testing**

One comment suggested that the State include in Recommendation 4 of Chapter 11 funding for fair housing testing and enforcement of Affirmatively Furthering Fair Housing obligations on subrecipients. This comment further suggested that the state require AFFH training for all subrecipients of its funding.

*(Madison Sloan, Texas Appleseed)*

Staff Response: Funds available to perform fair housing testing are limited to those CPD funds provided to the State, and allowed to be spent on such activities.<sup>5</sup> CPD administrative funds are used for enforcement of federal and state statutes, regulations, and rules, which as applicable for Fair Housing Act complaints may be referred to the Texas Workforce Commission. Additionally, the State's CPD

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<sup>5</sup> Fair Housing Testing is an allowable public service activity with non-administrative CDBG funds. However, unlike a local entitlement community the State cannot operate its own program, and may only award funds to units of general local government that do not receive direct CDBG funding. See 24 CFR §570.480(g) Thus, the State cannot award funds under the public services category to FHIPs or FHAPs, as there are no FHAPs in Texas that are non-entitlement communities. Fair Housing Testing is not an allowable program activity in other CPD programs.

subrecipients do receive fair housing and AFFH training. No changes have been made to the Analysis of Impediments as a result of this comment.

## **20. Recommended Actions**

One comment stated that the Analysis of Impediments lacks metrics, timetables, and other measurable to determine the State's progress on the listed action steps. The comment further indicates that HUD's Fair Housing Planning Guide requires measurable and time-bound goals.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The Fair Housing Planning Guide is a guide not a regulation, nor does it offer any guidance on timelines or metrics. The State contends that the AI and Consolidated Plan process is on a five year cycle and, as such, the State will be seeking to progress toward the stated action steps over the five year period. The action steps themselves are the metrics that will be used to prescribe and evaluate progress. No changes have been made to the Analysis of Impediments as a result of this comment.

## **21. Steering**

One comment requested that the State present detailed steps to neutralize practices that steer households to high poverty and segregated areas. Steering is the policy or practice of, either through word or action, directing those seeking housing toward an area based upon that area's overrepresentation or paucity of member of protected classes.

*(Demetria McCain, Inclusive Communities Project)*

Staff Response: The State did not receive any comments during its consultation period indicating that steering practices were occurring, nor did the State's analysis uncover any evidence of overt steering practices. However, TDHCA, via its Qualified Allocation Plan, incentivizes LIHTC developments to seek sites that are integrated and have low poverty levels. Furthermore, as the AI is has focused on impediments and activities that were highly commented on, the State does not wish to direct efforts away from taking actions on the identified impediments. No changes were made to the Analysis of Impediments as a result of this comment.

## **22. TxCDBG AFFH**

One comment stated that TDA requires AFFH actions only for potential housing projects.

*(Madison Sloan, Texas Appleseed)*

Staff Response: TDA disagrees with this comment. Chapter 10 of the TxCDBG Project Implementation Manual clearly requires all Grant Recipients, regardless of project type, to take action to Affirmatively Further Fair Housing prior to disbursement of any TxCDBG funding. In addition, each application for funding requires the applicant to identify those AFFH activities that have been performed and/or are

planned for the future. These activities are not limited to housing-specific projects in either the application or implementation documents. No changes have been made to the AI as a result of these comments.

### **23. TxCDBG – Project Selection**

One comment was in favor of requiring an AFFH review and approval for each project funded through TxCDBG, including project site selection.

*(Madison Sloan, Texas Appleseed)*

Staff Response: TDA evaluates each proposed project for compliance with the National Program Objective and activity eligibility as described by statute. HUD regulations do not require each project scope to result directly in AFFH outcomes, nor does HUD define what threshold might be used for such an eligibility standard. Rather, HUD focuses the primary eligibility of each project on assisting low- to moderate-income persons or other National Program Objectives, and separately requires the program overall to Affirmatively Further Fair Housing. TDA, in turn, requires each Grant Recipient to conduct AFFH activities. The program meets its obligation, in part, by ensuring that communities across the state have formally adopted and regularly reviewed policies and ordinances to prohibit discrimination and affirm fair housing choice, and to ensure the public is informed of their rights related to fair housing choice in each benefitting community.

Should HUD choose to introduce a defined AFFH “test” for subrecipient project selection in its basic eligibility requirements, TDA will implement the policy for all non-entitlement communities. No changes have been made to the AI as a result of these comments.

### **24. Disaster Recovery – Distribution of Funding**

One comment was made disagreeing with the current distribution of funding under FEMA’s Hazard Mitigation Grant Program and recommending that the State step in to help smaller jurisdictions advocate for more grant funding. The commenter posited that well-connected and well-resourced jurisdictions like Houston and Harris County secure larger amounts of funding from this grant source because they have the resources to do so. Absent necessary aid from the State in applying for these funds, smaller jurisdictions will continue to fail in their acquisition of essential funds for long-term mitigation.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas General Land Office, as the primary administrator of Community Development Block Grant for Disaster Recovery (CDBG-DR) funds, continuously works with and advocates on behalf of impacted communities to ensure that long-term disaster recovery needs are properly addressed.

It should be noted that FEMA’s Hazard Mitigation Grant Program is beyond the scope of the Texas General Land Office’s duties as the administrator of CDBG-DR funds in the State of Texas. No change has been made to the AI as a result of this comment.

One comment also disagreed with the GLO’s acceptance of the South East Texas Method of Distribution as it allocated funds based solely on level of inundation and total population without considering unmet need, ability to recover, or the relative population of the impacted area.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas GLO has worked diligently with impacted areas to ensure that proposed and accepted Methods of Distribution are designed in a manner that fosters an effective and efficient recovery for the associated disaster-impact area. No change has been made to the AI as a result of this comment.

### **25. Disaster Recovery – Requirement to Benefit Low and Moderate Income Populations**

One comment was made expressing concern that the requirement that 70% of the aggregate of CDBG-DR funds be utilized to benefit the low- and moderate-income population in the disaster impact area could, potentially, be reduced to a lower overall percentage.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas General Land Office (GLO) remains committed to the administration of CDBG-DR funds in strict compliance with all applicable local, state, and federal law. The current requirement that 70% of the aggregate of all CDBG-DR funds be utilized to benefit the low- and moderate-income population in the disaster impact area is mandated by HUD and, absent any changes issued directly by HUD, will remain unchanged. The GLO shall continue to advocate on behalf of all impacted Texans as it administers disaster recovery programs within the bounds of the law. No change has been made to the AI as a result of this comment.

### **26. Disaster Recovery – Assessment Method**

One comment was made expressing concern about the methodology by which the GLO assessed unmet need in the area impacted by Hurricane Harvey. The GLO’s usage of FEMA Verified Loss undercounts many low- and moderate-income disaster victims.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas GLO is committed to utilizing the most up-to-date and innovative methods of data analysis to adequately assess unmet need following a natural disaster. The GLO has recognized that there are issues with utilizing only FEMA verified loss when determining unmet need and, in an effort to



resolve some of those issues, supplemented that analysis with data presented by The Social Vulnerability Index. The GLO remains open to alternative means of data collection and analysis and seeks to ensure that the unmet need of every disaster-impacted Texan properly calculated. No change has been made to the AI as a result of this comment.

### **27. Disaster Recovery – Programs**

One comment was made in favor of the creation of more disaster recovery programs that would directly benefit low- and moderate-income renters in a disaster area. They suggested that there should be a program to provide direct assistance to renters in order to aid them in being able to stay in their community while long-term recovery, i.e. the rebuilding of rental units, is ongoing.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas GLO recognizes the validity of this comment and will give it adequate consideration as disaster recovery programs continue to develop. No change has been made to the AI as a result of this comment.

### **28. Disaster Recovery – TDEM Mitigation**

One comment was made recommending that The Texas Department of Emergency Management (TDEM) develop mitigation activities and plans that include a specific consideration of fair housing and civil rights implications of how these funds are awarded, targeted, and administered. TDEM has not participated in the Analysis of Impediments and should contribute alongside other State agencies.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The substance of this comment is beyond the scope of the Texas General Land Office. No change has been made to the AI as a result of this comment.

### **29. Disaster Recovery – Support**

One comment praised the Texas GLO for institutionalizing Affirmatively Furthering Fair Housing reviews as a part of the Community Development Block Grant for Disaster Recovery programs and commended the GLO's commitment to ensuring compliance with all federal fair housing and civil rights requirements. The GLO's statement of principles and criteria for buyout assistance is excellent.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The Texas General Land Office remains committed to ensuring all disaster recovery programs are administered in full compliance with local, state, and federal laws, including all federal fair housing and civil rights requirements. No change has been made to the AI as a result of this comment.

### **30. Disaster Recovery – Hurricane Harvey**

Comments were made regarding Hurricane Harvey funding:

- a. Hurricane Ike programs run by the State offered homeowners the ability to utilize their reconstruction benefit amount to rebuild on site or, in the alternative, to voluntarily move to a safer area with less concentrated poverty and lower levels of segregation;
- b. Buyout programs must provide families with real choice and this can be accomplished through the availability of certain incentives, like those available through The Harris County Flood Control District's buyout program. To date, there are no guidelines for local buyout programs that require the use of such incentives;
- c. The Method of Distribution (MOD) process following Hurricane Harvey was flawed and the MOD submitted by Southeast Texas Regional Planning Commission failed to properly address unmet need as required by the Federal Register notice;
- d. In conducting planning activities, the GLO is encouraged to look at previously conducted studies as models. Previous planning studies, like the Colonia Drainage Study, resulted in a comprehensive overview of the areas of need and infrastructure deficiencies, particularly in disinvested communities that may lack the most basic infrastructure protection;
- e. The state-administered FEMA temporary housing programs do not help the LMI population because FEMA makes all eligibility determinations; and
- f. Affirmatively Furthering Fair Housing and Civil Rights must be incorporated into the State's Action Plan for \$4 Billion in Mitigation funds when the Federal Notice for those funds is officially published.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The Texas General Land Office, in response to the above-listed comments, presents the following:

- a. Hurricane Ike programs allowed for homeowners to utilize their reconstruction benefit on-site or, in the alternative, to voluntarily move to a safer area. The Texas General Land Office recognizes the validity of this comment and is dedicated to exploring how the repeated usage of successful programs could benefit current disaster recovery efforts.
- b. The Texas General Land Office shall, through coordinated efforts with areas receiving direct allocations, work to ensure that all programs are administered in accordance with developed policies within all applicable federal law. As programs develop, implementation policies and supporting guidelines shall be drafted in a manner that considers all relevant factors and works to establish the most effective and efficient means for program implementation.

- c. The Method of Distribution submitted by the Southeast Texas Regional Planning Commission has been reviewed and approved by the GLO in accordance with all requirements outlined in the Federal Register notice.
- d. The Texas General Land Office remains dedicated to utilizing all relevant data and analysis, including previously conducted studies, to inform the agency as planning activities are developed.
- e. The Texas General Land Office, in its role as a State agency working to aid in the administration of a federal disaster relief program, is not charged with eligibility determinations. All eligibility determinations for FEMA Programs are the sole responsibility of FEMA and outside of the roles and responsibilities assigned to the GLO during that process. However, the GLO recognizes the issues presented in this comment and will continue to advocate for all impacted Texans during every stage of disaster response and recovery.
- f. The Texas General Land Office remains committed to ensuring that all federal disaster funding is implemented in accordance with all applicable local, state, and federal law, including all Affirmatively Furthering Fair Housing and Civil Rights laws. As with each federal disaster allocation, a detailed Action Plan shall be published to govern the administration of funds once those funds have been officially published for award in the Federal Register.

No changes have been made to the AI as a result of these comments.



**State of Texas**  
**Analysis of Impediments to Fair Housing**  
**Choice**  
**2019**

Prepared by:  
Texas Department of Housing and Community Affairs  
Texas General Land Office  
Texas Department of Agriculture  
Texas Department of State Health Services



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## Executive Summary

The Texas Department of Housing and Community Affairs (the Department) has produced this Draft 2019 Analysis of Impediments to Fair Housing Choice (AI) in conformance with the Affirmatively Furthering Fair Housing (AFFH) rule for HUD Community Planning and Development (CPD) funding recipients. The Department serves as the central coordinator of this document on behalf of all Texas state agencies which receive such CPD funds. More specific information on the member agencies and applicable CPD Programs can be found in Chapter 1, Introduction.

The overarching purpose of this document is to serve as a basis for fair housing planning with an aim towards increasing housing choice and identifying patterns of fair housing complaints. The aim of expanding housing opportunities and choice, regardless of protected class status, is a key factor in affirmatively furthering fair housing in Texas. The aim of identification of impediments allows the state to determine which of those impediments fall within the control and capacity of the state agencies that administer the CPD funds, and then take steps to address those impediments within their control.

Expanding housing opportunities and choice requires action and engagement across all levels of government. Impediments to fair housing choice manifest in a myriad of ways which are not all uniformly able to be addressed by state CPD recipient agencies. Solutions to addressing impediments, depending on the impediment involved, may be best resolved by local officials, other state agencies, federal programs, or private market activities. The State of Texas, through the efforts of state agencies participating in HUD CPD Programs, uses this AI process to ensure that it is able to take a meaningful role in affirmatively furthering fair housing choice for Texans.

The process used in generating this AI is already under way and is compliant with HUD requirements and the Department's Citizen Participation Plan. Extensive public input and consultation were garnered as further described in Chapter 1, Introduction. This draft AI is being presented to the Department's Board for approval, so that it can then be released for a formal public comment process and public hearings. Only after opportunities for comment are provided and comment considered, will a final AI document be presented to the Department's Board for consideration and final approval.

This AI both assesses where we are as a state as it relates to fair housing, and then identifies impediments and possible solutions, where applicable. Chapter 1 introduces the partner agencies, covered CPD Programs, methodology for the AI, and the public input process utilized. The subsequent several chapters look at where we are as a state through several lenses: through looking at a statewide overview of demographics and housing considerations (Chapter 2) and a regional analysis (Chapter 5), through reviewing statewide regulations and rules (Chapter 3), through discussing and describing actions that have been taken and are currently being undertaken to affirmatively further fair housing by the covered state agencies (Chapter 4), through performing an assisted housing portfolio analysis (Chapter 6) and a lending analysis (Chapter 7), and through an overview of fair housing complaints and cases (Chapter 8). All of those chapters together lay the framework for the identification of statewide impediments. Chapter 9 provides a review of specific considerations and actions having been taken specifically as it relates to disaster recovery and response with CPD funds by the General Land Office (GLO).



## Executive Summary

As noted, it is only through identification of those factors that stymie housing choice that we can determine what steps can be taken to attempt to mitigate those impediments. In developing the specific impediments for the draft AI, the Department considered past impediments and whether they continued to exist, the trends and observations seen through the earlier chapters in this document, as well as new input received during consultations. Because the issues addressed in past AIs were broad and pervasive challenges, and continued to be reiterated and reaffirmed across many input sessions, the state does not consider those past impediments to be resolved. However, based on newer insights and input those impediment statements have been revised to make them as current and relevant as possible. To that end, the state has identified five impediments to fair housing choice that it will strive to address during the next five years. Those impediments, listed in summary form below, are expanded upon in Chapter 10.

**Impediment No. 1:** Not in My Backyard Syndrome (NIMBYism) limits affordable housing development, which could limit housing choice for protected classes in some communities.

**Impediment No. 2:** There is a lack of understanding of and awareness of resources on fair housing law, rights, and duties available to local governments, stakeholders, and the public about fair housing requirements and programs to assist low-income residents and persons with disabilities.

**Impediment No. 3:** Protected classes may experience obstacles in accessing homeownership and lending products.

**Impediment No. 4:** The scarcity and location of accessible and visitable housing units limits fair housing choice for persons with disabilities.

**Impediment No. 5:** There are barriers for specific protected classes that limit mobility and free housing choice.

Finally, in Chapter 11, Conclusions and Recommendations are presented laying out the ways in which the state agencies with HUD CPD programs will use those resources to address solutions within their control with the CPD funds available. The AI works from the guiding principle of seeking to identify impediments to fair housing choice and to identify specific actionable steps that can be taken to effect meaningful changes aimed at mitigating the barriers to fair housing choice. The recommendations to address the identified impediments, listed in summary form below, are expanded upon with proposed action steps in Chapter 11.

**Recommendation 1:** Maximize accessible housing choice by promoting preservation and limiting displacement, continuing to encourage development in high opportunity areas, and encouraging creative, innovative solutions.

**Recommendation 2:** Increase the provision of educational resources to the developer, property manager, and tenant communities, and to the mortgage lending and realtor industries.

**Recommendation 3:** Reduce stigmatizing language and practices.

**Recommendation 4:** Actively engage in the enforcement of the Fair Housing Act.

**Recommendation 5:** Work with trade organizations, local jurisdictions, and regulatory agencies for mutual benefit.

## Chapter 1 - Introduction

Funds from the U.S. Department of Housing and Urban Development (HUD) come with the duty to affirmatively further fair housing. This obligation generates from the Fair Housing Act of 1968 which gives HUD a lead role in administering the Fair Housing Act. In 2015, HUD finalized the Affirmatively Furthering Fair Housing (AFFH) rule requiring HUD Community Planning and Development (CPD) funding recipients to complete an Assessment of Fair Housing (AFH) using a HUD created tool. Because the tools required to be used by state recipients of CPD funds have still not been finalized by HUD for use by states, the State is to continue to affirmatively further fair housing and assess fair housing issues through the use of the regulation that pre-existed that rule. The pre-existing regulation requires states to perform an Analysis of Impediments to Fair Housing Choice (AI).

HUD released a Frequently Asked Questions (FAQ) document regarding the Federal Register Notice: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants on January 16, 2018. The FAQ affirmed what process should be followed by specifying that states should conduct an AI within their jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions, as was the process prior to the AFFH rule. Therefore the State of Texas is achieving its fair housing planning through the completion of this AI. The AI covers policies, practices, and procedures affecting housing choice.

### **Texas' HUD Community Planning and Development Programs (CPD)**

The State of Texas administers its CPD program funds received from HUD across four state agencies: the Texas Department of Housing and Community Affairs (TDHCA), the Texas Department of Agriculture (TDA), the Texas Department of State Health Services (DSHS), and the General Land Office (GLO). This AI is a document reflective of all of those agencies efforts and activities as it relates to their CPD programs.

### **HOME Investment Partnerships Program - TDHCA**

The purpose of the HOME Program is to expand the supply of decent, safe, and affordable housing for extremely low-, very low-, and low-income households and to alleviate the problems of excessive rent burdens, barriers to homeownership, and deteriorating housing stock. HOME strives to meet both the goal of increasing the supply and the availability of affordable housing, and the goal of building partnerships between state and local governments and private and nonprofit organizations in order to strengthen their capacity to meet the diverse affordable housing needs of lower income Texans. To achieve this purpose, the HOME Program allows funds to be used for both development of multifamily properties affordable to low-income Texans, as well as for tenant based rental assistance, homebuyer assistance, rehabilitation assistance, and single family development. The Department's HOME Program provides loans and grants through units of general local government, public housing authorities, Community Housing Development Organizations (CHDOs), nonprofit organizations and other qualified entities to provide assistance to eligible households.

## Introduction

In accordance with state law (Tex. Gov't Code §2306.111) the Department is directed to expend 95% of its HOME Program funds for the benefit of non-participating small cities and rural areas that do not qualify to receive funds directly from HUD. This directs HOME funds into rural Texas. Those funds are further allocated regionally to promote dispersion of resources statewide. However, from time to time the Governor has waived this requirement to allow the State to respond more effectively in addressing disaster-related needs. Texas law also directs that 5% of the annual HOME Program allocation shall be allocated for applications serving persons with disabilities living in any part of the state. In addition, typically, federal regulations require that a minimum of 15% of the annual HOME allocation be reserved for CHDOs. However, this requirement has been waived by HUD for the 2016-2018 allocations. CHDO set-aside projects are owned, developed, or sponsored by the CHDO and result in the development of multifamily rental units or single-family homeownership.

### **Emergency Solutions Grants Program (ESG) - TDHCA**

ESG funds are awarded as grants to units of local government and private nonprofit entities that provide persons experiencing homelessness and at risk of homelessness with the services necessary to quickly regain stability in permanent housing. ESG funds can be utilized for the rehabilitation or conversion of buildings for use as emergency shelter for persons experiencing homelessness; the payment of certain expenses related to operating emergency shelters; essential services related to emergency shelters and street outreach for persons experiencing homelessness; and, homelessness prevention and rapid re-housing assistance such as rental and utility assistance.

TDHCA programs its ESG funds regionally for each of the HUD-designated Continuum of Care (CoC) Regions according to a combination of the region's proportionate share of a number of factors that may include population experiencing homelessness based on the Point-in-Time count submitted to HUD by the CoCs; people living in poverty; renters with incomes less than 30% Area Median Income (AMI) that experience cost burden; the amount of ESG funding received by federal and state funding streams in the past year; and other factors as listed in the Notice of Funding Availability (NOFA).

### **National Housing Trust Fund (NHTF) - TDHCA**

NHTF was created under the Housing and Economic Recovery Act of 2008. NHTF funding comes from a small percentage of the Federal Home Loan Mortgage Corporation's (Freddie Mac) and the Federal National Mortgage Association's (Fannie Mae) new business purchases annually, rather than from appropriations. Currently, the Department has programmed its NHTF funds for the development of affordable rental housing. HUD determines NHTF formula allocation amounts for each state based on several factors, but primarily the shortage of rental units affordable and available to households with extremely low income. NHTF requires that units are affordable for 30 years, and the households to be served must be at or below the greater of either 30% AMI or the federal poverty line. In Texas a primary focus of NHTF funds is to promote Supportive Housing.

## **Community Development Block Grant Program – Texas Department of Agriculture**

The TDA administers the non-entitlement portion of the Texas Community Development Block Grant Program (TxCDBG), which provides financial assistance to cities with populations of less than 50,000 and counties with population under 200,000. At the federal level, the funds are allocated under the Community Development Block Grant (CDBG) Program by HUD. The TxCDBG Program is a key federal source of funding that provides direct grant assistance to rural areas for public infrastructure improvements, disaster relief, housing, and economic development. In Texas the funds are competitively made available within each of 24 state planning regions. Most funds are utilized for public facilities, however a variety of other activities are eligible including, but not limited to, real estate development activities, Main Street revitalization projects, efforts in colonias and capacity building.

## **Community Development Block Grant Program – Colonia Self Help Centers – TDHCA**

The operation of the Colonia Self Help Centers (SHCs) is funded through a 2.5% set-aside from the CDBG Program at TDA. There are seven SHCs in the following counties: Cameron/Willacy, El Paso, Hidalgo, Starr, Webb, Maverick, and Val Verde. As provided for in Tex. Gov't Code 2306, Subchapter Z, each center identifies five colonias to receive concentrated on-site technical assistance to low- and very low-income individuals and families in a variety of ways. Colonia SHCs provide technical assistance in credit and debt counseling, housing finance, contract for deed conversions, and capital access for mortgages. The Colonia SHCs also offer housing rehabilitation, reconstruction, new construction, surveying and platting, and construction skills training. Lastly, the Colonia SHCs operate tool libraries to support self-help construction by residents of colonias. Operation of the Colonia SHC for each county is managed by a local nonprofit organization, Community Action Agency (CAA), or local unit of government that has demonstrated capacity to operate a Colonia SHC and been selected to do so by the county.

## **Housing Opportunities for Persons with HIV/AIDS (HOPWA) – Texas Dept. of State Health Services**

The DSHS administers the HOPWA Program. The program provides housing assistance and supportive services to help low-income persons living with HIV/AIDS and their households establish or maintain affordable and stable housing, reduce their risk of homelessness, and improve their access to health care and supportive services. DSHS contracts with Administrative Agencies (AAs) in seven Ryan White Part B HIV Planning Areas encompassing 26 HIV Service Delivery Areas (HSDAs). AAs subcontract with Project Sponsors in each HSDA for statewide service delivery, thereby serving all counties in Texas. DSHS selects AAs through a combination of competitive Requests for Proposals (RFP) and intergovernmental agency contracts. AAs act as an administrative arm for DSHS, with DSHS oversight, by administering the HOPWA program locally for a five-year project period. DSHS authorizes the following program services: tenant-

based rental assistance, short-term rent, mortgage and utility assistance, facility-based housing assistance, permanent housing placement, and supportive services.

## **Community Development Block Grant Program, Disaster Recovery — General Land Office**

Since July 1, 2011, the GLO has administered CDBG Disaster Recovery (CDBG-DR) Programs in Texas. CDBG-DR funds are a special appropriation from Congress, associated with presidentially declared disasters for long-term recovery efforts. The allocation, programming and planning is specialized to the specific disaster(s) for which the unique appropriation has been made. The Texas General Land Office serves as the Governor’s designated state agency responsible for administering CDBG-DR funds. Historically, less than 15 percent of the presidentially declared disasters have received Congressional supplemental funding. CDBG-DR Funds must meet one of the HUD designated National Objectives to be eligible for award: benefit low-to-moderate income persons, prevent or eliminate slums or blight, or meet urgent needs.

## **Methodology, Consultation, and Public Participation**

The four state agencies in Texas that receive HUD CPD funds - TDHCA, TDA, GLO, and DSHS - collaborated on the creation of the 2019 Analysis of Impediments to Fair Housing Choice. TDHCA takes the lead role in collaborating on the year-round coordination for fair housing among the agencies, and in drafting the AI. The Texas Workforce Commission, Civil Rights Division (TWC-CRD) also participates in the process, providing technical assistance and data on fair housing complaints.

In compliance with its Citizen Participation Process identified in its Consolidated Plan, the State conducted more than 40 separate consultations in order to garner input for the initial draft Analysis of Impediments. Thirty of those meetings were conducted around the state and were advertised to the public and to stakeholders alike. Four of the thirty public consultation meetings were public hearings that were published in the *Texas Register* and were posted on TDHCA’s external website. E-mail blasts were used to contact local officials, advocacy groups, stakeholder groups, and the public at large, inviting them to provide input on fair housing issues in their community for use in the draft Analysis of Impediments. An Analysis of Impediments webpage was created at <https://www.tdhca.state.tx.us/fair-housing/analysis-impediments.htm> listing the AI process and public meetings. The information was translated into Spanish and Vietnamese to reach persons with limited English proficiency, per the State’s language access plan. Accommodations were available to individuals requiring auxiliary aids, services, or sign language interpretation to participate in meetings, if requested three days before the meeting so that appropriate arrangements could be made. In addition, notices were made available in Spanish and Vietnamese for persons with limited English proficiency that interpreters would be made available for meetings if requests were made five days before a specific meeting so that appropriate arrangements could be made.

TDHCA sent e-mail blasts to the Department’s various distribution groups including: community affairs, consumer news and info, multifamily program participants, and all single family sub-

## Introduction

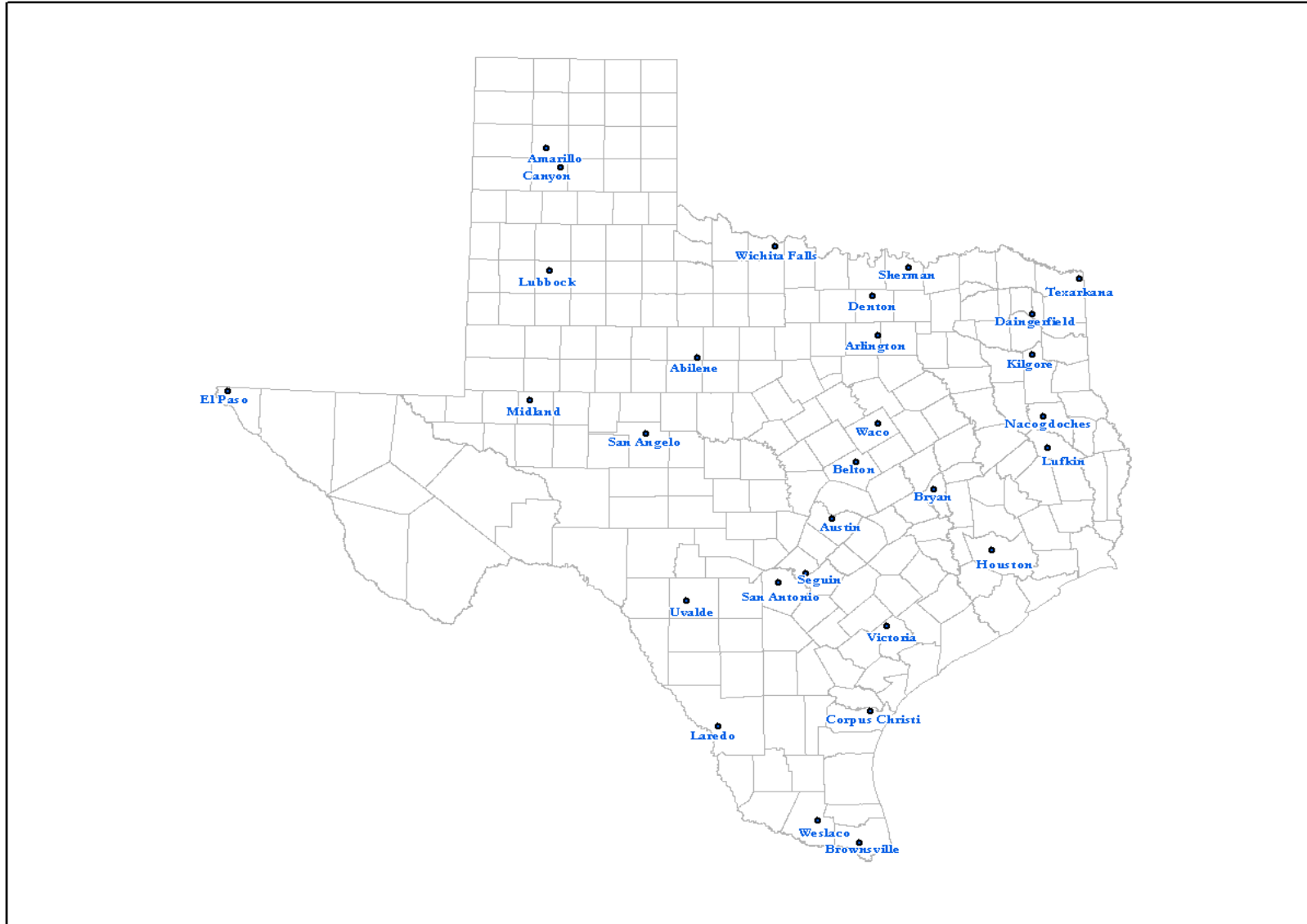
recipients. Media advisories were sent in English, Spanish, and Vietnamese to press contacts in the 12 different markets where TDHCA held public meetings. Those markets included Amarillo, Abilene, Austin, Brownsville, Corpus Christi, Denton, El Paso, Houston, Midland, Nacogdoches, Seguin, and Texarkana. The consultation meetings sought feedback regarding fair housing issues, particularly issues affecting protected classes under the Fair Housing Act: race, color, religion, national origin, sex, disability, and familial status; and specifically sought out information on the previously identified impediments and whether those issues continued to pose problems for communities.

Four opportunities for consultation were provided at regularly-scheduled meetings with specific stakeholder groups in order to reach as many groups as possible. These consultations included meetings with the Texas Interagency Council for the Homeless (TICH), the Housing and Health Services Coordination Council (HHSCC), the Disability Advisory Workgroup (DAW), and the Texas Affiliation of Affordable Housing Developers (TAAHP) during their annual affordable housing conference. Finally, six targeted online consultations were conducted using webinar software to reach specific stakeholder groups statewide. The online consultations covered the following topics: Fair Housing Initiatives Program (FHIP) & Fair Housing Assistance Program (FHAP) recipients seeking their insight on fair housing issues (two consultations); Housing Opportunities for Persons with AIDS Program participants and interested parties; fair housing specifically as it relates to disaster recovery and response; issues around narrowing the digital divide and how that can relate to fair housing; and the intersection of health services and fair housing.

Any and all input for the AI was accepted during the online consultations and allowed persons to contribute input from their own home, office, or remotely by phone. In total, across all scheduled outreach and consultations, only one meeting was not attended by any interested parties, and overall there were 495 individuals that attended consultations and meetings. An additional 15 parties submitted written input.

The in-person consultation meetings and public hearings were the primary avenue by which most individuals and groups chose to participate. Figure 1-1 provides a map of the consultation locations and Figure 1-2 provides the specific participant counts at each consultation meeting. Of the 510 total participants, 377 generated from these meetings and hearings. In addition to the meetings and hearings, members of the public and stakeholder groups were encouraged to submit written feedback and input to the Fair Housing and Data Management and Reporting (FHDMR) division at TDHCA. Written input was accepted throughout the public outreach process via email or postal mail. Input received by 5:00pm Austin local time on August 10, 2018, was considered as consultation for the draft Analysis of Impediments to Fair Housing Choice. Written input allowed persons unable to attend a meeting to provide input. In addition this allowed parties who attended a meeting in person to provide further consultation in a greater level of detail and analysis, even after the meeting had taken place. This robust early input and participation period provided great insight in the State of Texas' identification of impediments and in its ability to assess progress made toward previously identified impediments to fair housing choice.

Figure 1-1: Map of Outreach, Consultation Meetings for the AI



**Figure 1-2: Outreach, Consultation Meetings for the AI**

<b>Date</b>	<b>Outreach Type</b>	<b>Location / Subject</b>	<b>Attendees</b>
5/21/2018	Public Meeting	Waco	16
5/24/2018	Public Meeting	San Angelo	14
5/31/2018	Public Meeting	Lufkin	32
6/1/2018	Public Meeting	Kilgore	21
6/8/2018	Public Meeting	Laredo	2
6/11/2018	Public Meeting	Belton	16
6/12/2018	Public Meeting	Amarillo	5
6/12/2018	Public Meeting	Daingerfield	20
6/13/2018	Public Meeting	Midland	6
6/13/2018	Public Meeting	Seguin	1
6/14/2018	Public Meeting	El Paso	2
6/14/2018	Public Meeting	Abilene	2
6/18/2018	Public Meeting	Canyon	20
6/18/2018	Public Meeting	Lubbock	13
6/19/2018	Public Meeting	Abilene	13
6/20/2018	Public Meeting	Texarkana	7
6/20/2018	Public Meeting	Wichita Falls	17
6/21/2018	Public Meeting	Sherman	12
6/21/2018	Public Meeting	Weslaco	15
6/26/2018	Public Meeting	Bryan	12
6/27/2018	Public Meeting	Denton	4
6/28/2018	Public Meeting	Uvalde	20
7/9/2018	Public Meeting	Arlington	33
7/10/2018	Public Meeting	Victoria	29
7/20/2018	Public Meeting	Brownsville	5
7/20/2018	Public Meeting	San Antonio	18
6/14/2018	Public Hearing	Houston	5
6/22/2018	Public Hearing	Austin	2
7/12/2018	Public Hearing	Nacogdoches	0
7/27/2018	Public Hearing	Corpus Christi	7
7/10/2018	Stakeholder Meeting	Texas Interagency Council for the Homeless	15
7/11/2018	Stakeholder Meeting	Housing and Health Services Coordination Council	12
7/24/2018	Stakeholder Meeting	Texas Affiliation of Affordable Housing Providers	16
7/24/2018	Stakeholder Meeting	Disability Advisory Workgroup	11
6/14/2018	Stakeholder Web Meeting	FHIP/FHAP Meeting 1	9



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<b>Date</b>	<b>Outreach Type</b>	<b>Location / Subject</b>	<b>Attendees</b>
6/14/2018	Stakeholder Web Meeting	Housing Opportunities for Persons Living with AIDS/HIV	48
6/15/2018	Stakeholder Web Meeting	Disaster Related Issues	4
6/21/2018	Stakeholder Web Meeting	Digital Divide and Infrastructure	4
6/25/2018	Stakeholder Web Meeting	Health Services and Providers	4
7/12/2018	Stakeholder Web Meeting	FHIP/FHAP Meeting 2	3
8/10/2018	Submitted Written Input	Written Consultations and Input	15
Total Individuals Attending Consultations			510

## Summary of Public Comment and Reasoned Responses

### Summary of Public comment and Reasoned Response on the Draft State of Texas Analysis of Impediments to Fair Housing Choice (AI)

At the TDHCA Board meeting of March 21, 2019, the Draft AI was approved to be released for public comment. Two weeks prior to the TDHCA Board meeting, the Draft AI was posted to the TDHCA website and notification of this posting announced by email distribution to over 5,000 email addresses.

In accordance with the State's HUD approved Citizen Participation Plan, the public comment period for the Draft AI was open from March 25, 2019, to May 6, 2019. Notification of the public comment period and public hearings was announced by email distribution and published in the *Texas Register* on April 5, 2019. Thirteen public hearings were held, one in each TDHCA State Service Region. Notification of the public hearings was also released by TDHCA's Twitter and Facebook accounts and posted on the TDHCA Events Calendar (<https://www.tdhca.state.tx.us/events/index.jsp>) and the TDHCA Public Comment Center (<http://www.tdhca.state.tx.us/public-comment.htm>) webpages.

Eight individuals gave comment at the public hearings. Staff also received six email submissions of written comment; some of the commenters at the public hearings also submitted written comment via email. It should also be noted that one commenter at the public hearing in Midland did discuss HUD waivers with the Department, but did not specifically comment on the AI document or fair housing.

#### Comment Received Outside the Public Comment Period

One commenter submitted comment prior to the start of the public comment period. That commenter identified an error in a case citation of *Sims v. TDHCA*. While the case of *Sims v. TDHCA* had a correct citation, the State did, as a result, add some clarifying language to another related case citation in Chapter 8 to indicate that the case had originally been filed in the Western District of Louisiana. This change was already reflected in the final draft of the Analysis of Impediments that was approved by the TDHCA Board, and which was released for public comment. As a result, no changes to the Analysis of Impediments needed to be made to that version.

One comment was received after the public comment period closed; however three of the four topics addressed by this late comment were covered in other timely submitted public comments so are still addressed in the following summary. The fourth topic covered in this late submission was not germane to the AI.

#### Summary of Comments and Staff Responses

A summary of the comments received during the public comment period presented by topic, along with staff responses, is below.

## 1. Scope – Breadth of Agencies Covered

Four commenters indicated that the scope of the AI should not only focus on the agencies that administer the HUD CPD programs, but should be expanded to include a broader range of State and governmental agencies both in addressing impediments and in identifying actions to be taken. For example, one commenter indicated that the Texas Commission on Environmental Quality (TCEQ) should be included to consider environmental impacts of low income minority populations residing near industrial activity, and another felt that the Texas Department of Transportation (TXDOT) or the Texas Transportation Commission should be included so that regional mobility planning could be considered during housing development planning. Another agency noted as not having been involved in the development of the AI that should have been is the Texas Department of Emergency Management (TDEM).

One comment also noted that AFFH is not confined to expanding housing opportunities and encompasses remedying historical disinvestment and discrimination, and addressing structural factors that have deprived protected classes in Texas of access to opportunity and meaningful housing choice, and perpetuated segregation.

One commenter noted that such a narrow scope does not allow adequate consideration of all the factors in our state that influence fair housing; another suggests that the list of impediments and actions steps to address those impediments is incomplete by nature of excluding the broader scope of agencies. A commenter takes this further and suggests that if in fact the impediments and action list do not include this broader scope, then the AI is incomplete and cannot support the Department's AFFH certification, thus creating a basis for HUD to disapprove any Consolidated Plan submitted. One other comment related to scope critiqued the fact that the list of impediments is essentially the same as the list of issues for the 2013 AI.

*(Comments made by: Madison Sloan, Texas Appleseed; Demetria McCain, Inclusive Communities Project; Amelia Adams, Texas Housers; Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff response: In the development of the draft AI, the State used the HUD Fair Housing Planning Guide (FHPG) as a reference guide for much of the content and format. However, it should be emphasized that the FHPG is merely guidance for the AI, and is not a promulgated regulation.

In 2018, HUD promulgated two important Advance Notices of Proposed Rulemaking (ANPR): one requested comment on the changes to its disparate impact rule necessitated by the U.S. Supreme Court's ruling in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015) ("*ICP*"). The resulting new disparate impact rule proposed by HUD (currently out for public comment at the time of this response) will drastically change the HUD standard of what constitutes actionable disparate impact discrimination, and how it can be prosecuted under the FHA. The second ANPR was a broad-reaching request for comment on changes to the entire AFFH rule in light of this landmark Supreme Court opinion. Accordingly, the AI is most appropriately conformed to the current Supreme Court interpretation of the scope of the Fair Housing Act, as opposed to HUD's decades-old planning guide or its soon-to-be-superseded rules that HUD has already taken steps to rectify to conform with the Supreme Court's opinion.

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In *ICP*, the Court adopted an exacting standard for disparate-impact claims under the FHA. At the *prima facie* stage, a disparate-impact claim requires the plaintiff identify a particular facially neutral practice, prove a robust causal connection between the identified practice and the claimed disparate impact, and demonstrate that the disparate impact causes a barrier to housing. *See id.* at 2523. Thus, in the disparate-impact context, the FHA prohibits only specific, identified practices that cause a statistical disparity regarding a classification protected under the Fair Housing Act and create a barrier to housing for that protected class. *See id.*; *see also id.* at 2521 (stating the “[t]he FHA . . . was enacted to eradicate discriminatory practices”). Notably, the Court found that the FHA may be used to remove artificial, arbitrary, and unnecessary barriers to housing, but stated, pointedly, that it “is not an instrument to force housing authorities to reorder their priorities,” nor does it “decree a particular vision of urban development.” *Id.* at 2522, 2523. It follows that any analysis of impediments to fair housing would use the current legal standard of what can be enforced under the FHA (as well as whether an identified impediment is within the control of the State) as the basis for its plan.

Regarding certain commenters’ requests to include all State agencies in the AI, the FHPG states: “(a)lthough the grantee’s AFFH obligation arises in connection with the receipt of Federal funding, its AFFH obligation is not restricted to the design and operation of HUD funded programs at the State or local level.”<sup>1</sup> Indeed, while the inclusion of a broader range of State agencies is “not restricted” in the AI, it is quite notably also not required. No law or regulation exists that requires states to expand the scope of a state AI beyond the programs that receive specific types of HUD CPD funding.

It is important to note that none of the Texas state agencies that administer these specific types of HUD CPD funding have the statutory authority or ability to direct or influence policy at other Texas state agencies. To suggest that the AFFH certification signed by TDHCA could only be accurately and truthfully signed if TDHCA exceeds its statutory scope by presuming the ability to set policy within other state agencies, except as specifically allowed for under state legislation or as agreed to by other state agencies that receive specific types of HUD CPD funding, would be legally remiss. Therefore, while TDHCA understands that many things outside of its control may affect how low income Texans seek and find housing, TDHCA disagrees that all of those issues should fall within the scope of this document.

No changes have been made to the AI as a result of these comments.

As it relates to the comment that the impediments appear to repeat the same issues from the prior AI, the State addressed the reason for this in the AI:

*“In developing the specific impediments for the draft AI, the Department considered past impediments and whether they continued to exist, the trends and observations seen through the earlier chapters in this document, as well as new input received during consultations. Because the issues addressed in past AIs were broad and pervasive challenges, and continued to be reiterated and reaffirmed across many input sessions, the state does not consider those past impediments to*

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<sup>1</sup> HUD Fair Housing Planning Guide, page 1-3.

*be resolved. However, based on newer insights and input those impediment statements have been revised to make them as current and relevant as possible.”*

## **2. Scope – Local and Regional Coverage**

One commenter indicated that the scope of the AI should be focused more locally to propose region-specific solutions and implementation processes. They suggest that the AI should address how TDHCA will work with regulatory agencies and local jurisdictions within each of the state’s 13 regions. They also suggest that the State should work with units of government that receive these types of HUD CPD funding on the development of their AIs. One commenter also noted that activities of the North Central Texas Council of Governments, who use their funds for infrastructure, also play a role in housing, and could better address environmental justice issues.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff response: The State does not agree that the development of local and regional AI documents is part of its responsibility; those activities are the responsibility of local units of government themselves. The commenter admittedly notes that it is because their local PJ, the City of Lubbock, has not performed an AI that they feel the Department should now step in. The process for developing a state level AI is different from the process that local municipalities and regional PJs use to develop their AI or Assessment of Fair Housing (AFH), whichever is required by HUD for a particular local entity. However, in an effort to enhance the actions identified to support Recommendation 5, regarding Work with Trade Organizations, Local Jurisdictions, and Regulatory Agencies for Mutual Benefit, the State has added language regarding coordination with units of government required to perform an AI, and sharing of best practices.

## **3. Scope – Historical Perspective**

One commenter suggested that the AI should include a detailed historical account of the reasons for current patterns of discrimination and segregation. They posit that only through understanding the historic patterns of segregation can impediments to fair housing be understood; without explaining the history in the AI, the document will be weak in overcoming barriers. They appear to suggest that each region’s analysis section should cover that region’s history and background. Further, comment criticized the lack of more detailed statistical and regional patterns of historical and current segregation or race-related impediments.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: As stated, above, the opinion in the ICP case makes clear that the FHA can be used to challenge current policies that are demonstrated to have a robust causal connection to a disparately impacting barrier to fair housing. As important as a city’s history may be to its citizens, it is not particularly relevant to the legal analysis of whether a current policy is responsible for creating a barrier to fair housing. After all, only current policies could be enjoined as a remedy – not historical policies.

No changes to the Analysis of Impediments have been made as a result of these comments.

#### 4. Source of Income Discrimination

Six comments indicated that source of income discrimination, specifically discrimination against Housing Choice Voucher holders, was an obstacle in protecting tenants from discrimination. More specifically, several commenters criticize the state law that bars municipalities from enacting local ordinances that would protect tenants from discrimination based on source of income. These comments also pointed to the correlation between race and ethnicity and status as a Housing Choice Voucher holder. Commenters stated that this could be considered grounds for a claim of disparate impact and suggested the state look at the recent report published by the Urban Institute.

*(Sandy Rollins, Texas Tenant's Union; Owen Wilson Chavez, Child Poverty Action Lab; Demetria McCain, Inclusive Communities Project; Maddison Sloan, Texas Appleseed; Amelia Adams, Texas Housers; Christa Walikonis, Disability Rights Texas)*

Staff Response: Neither source of income nor poverty status are protected classes under the Federal Fair Housing Act or the Texas Fair Housing Act. While the Urban Institute's study on Housing Choice Voucher denials does support that in the metropolitan areas tested many landlords do not accept vouchers, the study only included one city in Texas (Fort Worth) and does not offer a full picture of the situation in the state. Moreover, the United States Court of Appeals for the Fifth Circuit upheld a previous District Court ruling in *Inclusive Communities Project v. Lincoln Property Company et al.*, 17-10943 (5<sup>th</sup> Cir. July 16, 2019) and found that refusal to participate in the Housing Choice Voucher Program did not constitute disparate impact or disparate treatment. Additionally, it is not under the jurisdiction of any of the State agencies who receive HUD CPD funds to mandate that private market landlords accept Housing Choice Vouchers. For the portfolio for which TDHCA does have authority, TDHCA requires any Development that receives Low Income Housing Tax Credits, Bonds, or Direct Loan funds from TDHCA to accept Housing Choice Vouchers, HOME Tenant Based Rental Assistance, or other federal, state, or local government rental assistance program. See 10 TAC §10.610(b)(2)(B). The Texas Legislature, in 2015, banned local jurisdictions from passing protections against source of income discrimination.<sup>2</sup> No changes to the Analysis of Impediments have been made as a result of these comments.

#### 5. Income Levels

One commenter noted that programs that focus affordable housing at 80% of area median income are not often creating units that are below market rents; they are often at or above market rents. To serve those most in need, who are often protected classes, programs should be targeted to lower area median income levels.

*(Sandy Rollins, Texas Tenants Union)*

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<sup>2</sup> ICP sued Texas Governor Greg Abbott over the enforcement of this law, and the case was dismissed on jurisdictional grounds. See *ICP v. Abbott*, No. 3:2017cv00440 (N.D. Tex. 2018)(S. Fitzwater) Doc. 63 (Memorandum Opinion and Order).

Staff Response: The Department agrees that program limits do not always result in rent levels that are achievable for all low income households. Many of TDHCA's programs do serve households well below 80% of area median income. No revision to the AI is suggested.

## **6. Persons with Disability**

One commenter appreciated the inclusion of the impediments faced by persons with disabilities in the Draft AI. They stated that they felt the Department's representation of disability issues made good use of the most recent data, and that the Department made clear the connection between disability and poverty, and their combined effects on finding housing. They also were pleased to see the Department address service animals and possible training in that regard.

*(Christa Walikonis, Disability Rights Texas)*

Staff Response: Staff appreciates the feedback, and no revision to the AI is suggested as a result of this comment.

## **7. TDHCA Home Purchase Programs**

One commenter made comments regarding the State of Texas homebuyer and homeownership programs. Specifically, comment was received that participation in TDHCA's homeownership and homebuyer programs was low in the City of Lubbock, and that TDHCA did not have enough low income homebuyer activities. Furthermore, the commenter suggested that the Analysis of Impediments should include a detailed plan for better educating the community on resources available to help lower income households.

*(Michael Bates, Northwest Texas Legal Aid/Alliance of East Lubbock Neighborhood Associations)*

Staff Response: TDHCA recognizes that there may be a lack of awareness of the homeowner and homebuyer programs that the agency provides. For this reason, the State proposed Recommendation 2 which is to increase the provision of educational resources to the developer, property manager, and tenant communities, and to the mortgage lending and realtor industries. Specifically, the state plans to provide and promote training for nonprofit and realtor groups who work with low income households on TDHCA's homeownership and homebuyer programs. Additionally, TDHCA will reach out to credit counseling agencies to provide targeted outreach and identify areas where there may be a shortage of HUD certified housing counseling organizations. Additionally, Recommendation 5, which increases collaboration with trade groups, local jurisdictions, and regulatory agencies, specifically mentions targeting outreach and collaboration with groups that can help low income Texans learn about and access TDHCA homebuyer programs. No changes have been made to the Analysis of Impediments as a result of these comments.

## **8. Lending Activities and Credit History**

One comment indicated that the Analysis of Impediments ignored evidence of lending discrimination and suggests that the state perform testing to find said discrimination.

*(Madison Sloan, Texas Appleseed)*

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Staff Response: The State disagrees with this comment, specifically the characterization that evidence was ignored. Chapter 7 of the Analysis of Impediments presented a detailed review of lending in the State of Texas. In this chapter, the State identifies differences in home mortgage loan denial rates for several different protected classes: sex, race, and national origin. Furthermore, the State further analyzed these differences by income grouping to add statistical controls and increase the generalizability of the analysis. Additionally, the State identified differences in the primary reasons given for loan denials between races and national origins. The State concludes that the data available is insufficient to establish a causal relationship statewide between an applicant's sex, race, or national origin, and their denial for a home mortgage loan. This insufficient data problem is echoed by many studies; conclusions cannot be determined on the causality of loan denials without data on credit scores of applicants, actual debt-to-income ratios of applicants, and the formulae used by credit agencies and lending institutions to determine credit score and credit worthiness. The State does suggest that greater transparency from lenders and credit agencies on their lending decisions and credit worthiness decisions could shed light on what, if any, causal mechanisms account for denial rates that vary across protected classes. No changes have been made to the Analysis of Impediments as a result of this comment.

One further comment objected to the framing of credit history as a problem attributable solely to housing seekers.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The State does not agree with the characterization of credit history as a problem only attributable to housing seekers. In fact, the State identified the lack of clarity and transparency used by lenders to calculate credit score and evaluate credit history as the reason the State is unable to identify a causal mechanism statewide for the identified disparities in lending denial rates and reasons for those denials. Those same factors may affect those seeking rental housing; however, the lacking data still precludes a means of establishing causality statewide. No changes have been made to the Analysis of Impediments as a result of this comment.

One comment requested that the AI should also address the lack of private lending products available to low income households.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: The State agencies that receive these HUD CPD funds do not have the authority to force or require private institutions that engage in lending to extend products to low income households. To help in addressing gaps in the private lending market, TDHCA does offer programs for low-income households through the My First Texas Home program, as well as several homeownership related products through its HOME, Bootstrap, and Self-Help Center Programs. No changes have been made to the Analysis of Impediments based upon this comment.

One other comment on this topic specifically noted the lack of Federal Housing Administration loans in the City of Lubbock.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*



Staff Response: Federal Housing Administration loans are federal products that are administered through private lenders. This loan program is not something overseen by TDHCA, nor does TDHCA dictate or control Federal Housing Administration policies. As a result, TDHCA is unable to take any action regarding these loans. No changes have been made to the Analysis of Impediments as a result of this comment.

### **9. Transportation and Increasing Mobility**

One commenter noted a strong tie between public transportation and fair housing choice, and suggested that the AI include incorporating regional public transit planning, for areas of the state such as the City of Lubbock. Additionally, the commenter remarked on the state of public transit in Lubbock being ineffective and the siting of LIHTC properties in Lubbock being too far from transit services. The commenter suggested said that Lubbock needs State coordination to increase mobility. The commenter also suggests that the data provided regarding commute distances and times, because they are provided at the broader regional level, give a perspective that those who deal with housing barriers do not have mobility barriers.

*(Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: The State is aware that individual cities and regions have their own critical issues to face and their own unique situations. However, the State of Texas Analysis of Impediments is focused on activities stemming from the State's allocation of HUD CPD funds. Because of the limited scope and amount of these funds, and the statewide breadth of the AI, the State is not in a position to generate data, information, and mobility planning services for every city, county, and region in Texas. Additionally, any jurisdiction receiving these CPD funds has the duty to produce an AI. Lubbock, as a recipient of these funds, will have the ability to focus on the issues that are specific to this region in its own AI or AFH per HUD guidance.

In Chapter 5 of the Analysis of Impediments, the State performed analysis on the transportation situation of each TDHCA service region by way of commute times and inflow and outflow of workers; this data was not intended to imply that no mobility barriers exist, but only to show the relative commute data from region to region. While the amount and availability of public transportation will vary by city, none of the state agencies receiving these CPD funds have the authority to make any mandates to local transit authorities. In an area of policy that TDHCA can influence, TDHCA's Qualified Allocation Plan and Uniform Multifamily Rules have historically incentivized siting Multifamily properties near public transit opportunities. No changes have been made to the Analysis of Impediments as a result of this comment.

### **10. Data in the AI.**

Several comments stated that the data used in the Analysis of Impediments should have included other groups, used different definitions or provided more analysis as provided more specifically below.

One commenter noted that the definition of "disability" used in the analyses in the AI is not the same as the definition of "disability" as understood in the Fair Housing Act.

*(Jason Howell, Recovery People)*

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Staff Response: The State agrees that the FHA definition is not used in the data presented. Unfortunately, the FHA definition of “disability” is not universally used and does not readily translate for the scale of the data that was needed and the broad range of data sources required to complete this document. For instance, the American Community Survey does not report data on the type of disability in line with the definition offered by the FHA. As the ACS comprised a large portion of the data used and required, it was not possible to use the definition given by the FHA. In response to this comment, the State will add a disclaimer at the beginnings of Chapter 2 and Chapter 5 explaining that the FHA definition of “disability” is broader than the definitions used in the ACS data.

Another commenter indicated that the Analysis of Impediments should include individuals in recovery in the Special Needs Populations segment of Chapter 2.

*(Jason Howell, Recovery People)*

Staff Response: The State is not aware of statewide data that would reliably capture this population. Additionally the State, for consistency, used the same Special Needs Populations in the AI as are contained in other related Department documents such as the State of Texas Low Income Housing Plan and Report (SLIHP). Populations that the Department considers to be Special Needs are required to be in the SLIHP in accordance with §2306.0721(c)(1) of the Tex. Gov’t Code. While the State does recognize that individuals in recovery are a subset of persons with a substance use disorder, it is not a specifically listed group in the aforementioned Tex. Gov’t Code. No changes have been made to the Analysis of Impediments in response to this comment.

Two other comments recommended that data reported in the Analysis of Impediments should be broken out by race and ethnicity, especially in Chapters 2 and 5.

*(Demetria McCain, Inclusive Communities Project)*

Staff Response: Staff agrees that because race and national origin are protected classes, these are vital categories for data analysis. Unfortunately, the State is limited by the availability of data and the constraints of the data used. For instance, the HUD Comprehensive Housing Affordability Strategy data (CHAS) does not include race and national origin in all of their tables. Without this, the State is unable to create breakouts by race and national origin for data on housing problems such as cost burden, lacking complete kitchen and plumbing, and overcrowding. Wherever possible and germane, the State has tried to include data on any protected classes other than religion, which had a very low incidence of complaints. No changes were made to the Analysis of Impediments based on this comment.

### **11. Boarding Home and Group Home Terminology Usage**

One commenter indicated that the Analysis of Impediments did not accurately define the term “boarding home” and used the term “group home” too loosely.

*(Jason Howell, Recovery People)*

Staff Response: The state appreciates this comment and has made changes to keep the use of terminology more consistent when discussing group home facilities. Staff used the HUD and Department of Justice Joint Statement on State and Local Land Use Laws and Practices and the Application of the Fair Housing Act as a guide for how to use the proper terminology. However,

staff would note that the AI did correctly define boarding home per §260.001 of the Tex. Health and Safety Code.

## 12. State Laws

One commenter broadly addressed their concern over this section (Chapter 3) on state laws and regulations, and suggested that the list of state laws and regulations described in Chapter 3 do not account for the disparate impact of facially neutral laws on protected classes, and that the chapter “glaringly” excludes several state laws with discriminatory effects that may have been passed with discriminatory motives. *(Note: the specific laws noted by this commenter are described below.)* This commenter also noted that the AI fails to discuss state law as it relates to the QAP for the LIHTC program.

*(Madison Sloan, Texas Appleseed)*

More specifically, two comments stated that the State should identify the state statute that bans inclusionary zoning as an impediment. Inclusionary zoning refers to the practice of cities requiring or incentivizing developers to set aside a portion of new housing units produced for “below market rate” (BMR). In 2015, the Texas State Legislature passed legislation that disallowed Texas municipalities from engaging in inclusionary zoning. One of those commenters also noted that Chapter 3 did not include the state statute banning linkage fees. Texas Local Gov’t Code §250.008 states that a political subdivision may not adopt or enforce a charter provision, ordinance, order, or other regulation that imposes, directly or indirectly, a fee on new construction for the purposes of offsetting the cost or rent of any unit of residential housing.

One comment also suggested that the State statute that requires any housing project by a Public Housing Authority to have a meeting in order for the project to begin construction, should be identified as an impediment. The law treats “public housing as a more noxious use than a major source of pollution...” Further, the commenter states that the signage requirements and meeting requirements for those meetings allow for NIMBYism.

This commenter also noted that state law parameters on non-entitlement CDBG programs can also have a disparate impact.

*(Madison Sloan, Texas Appleseed; Demetria McCain, Inclusive Communities Project)*

Staff Response: As previously stated, the opinion of the Supreme Court in *ICP* governs how a disparate impact theory of discrimination may be recognized under the FHA. Regarding a challenge to a state policy, it is the claimant’s burden of proof and persuasion to make a *prima facie* showing of discrimination (a demonstration of a robust causal link between the policy and a disparately impacting barrier to fair housing). Only then does the burden shift to the state to provide an explanation of the policy’s rationale: “housing authorities and private developers [are provided] leeway to state and explain the valid interest served by their policies.” *ICP*, 135 S. Ct. at 2522. Thereafter, the claimant then resumes their burden of proof and persuasion to rebut this explanation, and to satisfy the formidable legal standard that challenged policies “are not contrary to the disparate-impact requirement unless they are artificial, arbitrary, and unnecessary barriers.” *ICP*, 135 S. Ct. at 2524 (internal citation and quotation omitted).

The Commenters would have TDHCA reverse this burden-shifting analysis, and have the Department presume the illegitimacy of a state law on the basis of the Commenter’s suspicion that it was tainted at some point in the legislative process with “discriminatory motives.” This, despite the fact that TDHCA (as an executive agency of the State of Texas) has no legal authority to simply ignore state law, or presume a lack of constitutionality, reasonableness, or public interest in any duly-enacted statute.<sup>3</sup>

Regarding the exclusion of the laws that relate to the Housing Tax Credit programs, as discussed earlier in the section on scope, the Department does not believe the LIHTC Program is subject to AI. Moreover, the elements of the QAP that were questioned by the Commenter are required by state statute to be in the QAP, raising the above-discussed issues of the burden-shifting analysis for showing a disparate impact, as well as TDHCA’s lack of authority to manipulate state law. No changes to the AI are made in response to these comments.

### **13. Impediment One**

One comment agreed with the inclusion of the first impediment regarding Not in My Backyard Syndrome (NIMBYism). It was criticized that several state laws might be considered as enabling and encouraging NIMBYism, which was addressed in the item above. Another commenter noted that they agreed with the inclusion of this impediment, but thought more detail on NIMBYism should be provided.

*(Madison Sloan, Texas Appleseed; Johanna Rohan, Aging and Disability Resource Center)*

Staff Response: The State appreciates these comments. Staff did not feel that further additions on the subject of NIMBYism were needed. No changes have been made to the Analysis of Impediments as a result of this comment.

### **14. Impediment Two**

One comment suggested that impediment 2, relating to a lack of understanding and awareness of resources on fair housing, should be reformulated to include reference to local government officials. Currently the impediment focuses on education and outreach to housing providers and housing seekers.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The State agrees that outreach under Impediment Two should include local government and in the title to the Impediment specifies local government as part of those that warrant ongoing awareness.

Another commenter addressed a specific facet of Impediment Two, and an area of input received, relating to the negative impact that criminal background criteria have on seeking affordable housing, and that protected classes are impacted by this. Inconsistent provider policies, unreasonable look-back periods and challenges with reading criminal histories were all concerns. This commenter also noted concern with helping those that have been formerly incarcerated with accessing disability benefits.

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<sup>3</sup> See, e.g. Tex. Gov’t Code §311.021 (Intention in Enactment of Statutes)

*(Natalie Burtzos)*

Staff Response: Staff appreciates this comment, which further supports this issue as summarized in the AI. The Department is addressing this issue through Recommendation Two.

### **15. Impediment Four**

One commenter indicated that the fourth identified impediment regarding the lack of accessible and visitable housing should be reworded to include issues with the location of accessible and visitable housing. The commenter did note that in the description of the impediment in the AI text the State did address location as part of the impediment.

*(Madison Sloan, Texas Appleseed)*

Staff Response: Impediment 4 has been revised to include the location of accessible and visitable housing, since location of accessible and visitable housing is discussed in the description of Impediment 4.

### **16. List of Impediments**

Discussed in part already under Item One, relating to Scope, one commenter suggested that the list of impediments in Chapter 10 was incomplete. In particular, the commenter cited a bill regarding eviction history distribution when the eviction is dismissed, a lack of regulation of predatory lending, and a lack of regulation on insurance denials as examples of issues to be included with the fifth impediment. The commenter also suggested adding deliberate zoning decisions and environmental hazards as further examples.

*(Madison Sloan, Texas Appleseed)*

Staff Response: While these issues may be perceived as having an effect on where low income households locate housing, these are not issues that the agencies receiving HUD CPD funds have statutory authority to effect. Therefore, no changes have been made to the AI as a result of these comments.

### **17. Public Comment Process**

Two comments suggested that the Analysis of Impediments should include a list of the participants in the public comment process.

*(Demetria McCain, Inclusive Communities Project; Owen Wilson Chavez, Child Action Poverty Lab)*

Staff Response: The state conducted robust early public consultation for the initial Draft Analysis of Impediments in accordance with 24 CFR §91.110 and the State's HUD-approved Citizen Participation Plan. This initial consultation process, conducted prior to and outside of the official public comment process, is documented in Chapter 1. All public comment received during the public comment period of the draft AI is considered public. Those public comments will be summarized in Chapter 1 and given reasoned response, and the comments themselves will be provided in an appendix as well as transcripts of all hearings, in accordance with the State's HUD-approved Citizen Participation Plan. While this was already the plan for handling comment received, the State appreciates these comments.

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Two commenters critiqued the public comment process itself. These comments suggested that the State needed to give more notice to the public regarding the AI process and public comment period. Additionally, these comments indicated that the State should have utilized methods other than mass emails to solicit input for the AI.

*(Demetria McCain, Inclusive Communities Project; Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: The State appreciates these comments. While no changes have been made to the document itself as a result of these comments, the State will use these suggestions for outreach as it takes actions under Recommendations 3 and 5 to educate and work with stakeholders on implementing action, in the preparation of future Analyses of Impediments, and possibly other documents as appropriate. Changes to Recommendation 5 have been made as a result of these comments to indicate that the State will invite more local entities to join its fair housing communications distribution list.

### **18. Low Income Housing Tax Credits**

Six comments discussed the importance of the process in the QAP for considering undesirable site and neighborhood features as an essential step in ensuring that new affordable housing does not perpetuate the concentration of affordable housing and of people of color who disproportionately comprise the tenants in the developments. The comment indicated that, during the 9% HTC application process specifically related to evaluating the undesirable site and neighborhood standards associated with specific properties, “while the TDHCA staff has routinely noted applications that fail to meet the criteria for an appropriate location, the [Governing Board] of TDHCA has waived the negative area determination and restored the application for consideration. This happens routinely to the point of rendering the criteria irrelevant. This segregative practice is now a major impediment to Fair Housing in Texas and must be identified as such in the AI and an action step proposed to restrain these board actions.” One of the commenters also noted that there is no evaluation in the AI of whether there are patterns of discretionary decision-making that override QAP requirements, and that the program continues to be ineffective in providing low-income children with access to high-performing schools.

*(Amelia Adams, Texas Housers; Madison Sloan, Texas Appleseed)*

Staff Response: As a general legal matter, the question of whether the board’s “discretion” in the interpretation and application of its rules, on its own, can serve as the basis for a discrimination suit under the FHA has already been answered in the negative. Following the Supreme Court’s remand of the ICP case to the District Court, the plaintiff advanced this as their primary theory. The District Court thoroughly rejected it, stating:

*“By relying simply on TDHCA’s exercise of discretion in awarding tax credits, ICP has not isolated and identified the specific practice that caused the disparity in the location of low-income housing. Like the plaintiff in Anderson, ICP has pointed to the “cumulative effects” of TDHCA’s decision-making process over a multi-year period. ICP cannot rely on this generalized policy of discretion to prove disparate impact.*

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...

*Finally, ICP maintains that TDHCA has used its discretion to approve projects located in areas of slum and blight, with high crime rates, adverse environmental conditions, and where there is a high concentration of LIHTC units. TDHCA responds that ICP's concerns are exaggerated, and that ICP has not demonstrated that the decision to approve projects in certain areas causes a statistically-significant disparity. ICP has not established that TDHCA's approval of projects in areas of slum and blight caused a racially disparate impact, and ICP does not seek a constitutionally-permissible remedy.”<sup>4</sup>*

The statement by commenter that pairs the review of individual applications and the limited use of discretion, and then labels determinations as a “segregative practice” is without logical or factual foundation. It should be noted that in many cases exceptions to neighborhood risk factors made by the Board are related to rehabilitation activities – in other words, if the exception were not granted, the low income households residing in the affected properties would have continued to live at the property *without* rehabilitation and improved conditions. But in all cases, the record before the board will reflect the individual application’s specific circumstances that would justify the request before the Board, and often contains pleas from members of the community who are seeking the low-income housing resources in their neighborhood. No changes to the Analysis of Impediments have been made as a result of these comments.

Two of these comments related to TDHCA’s strategy of “balancing” the siting of new affordable housing against the preservation of aging housing or housing that is nearing the end of its affordability period. These comments specifically asked the State to conduct an analysis of LIHTC projects and siting to determine if the program helps to locate affordable housing in high opportunity areas. Two further comments indicated that the current definition of “Concentrated Community Revitalization Plans” in the LIHTC program is not clear and is too easy to circumvent. Finally, two comments asked TDHCA and the State to evaluate the impact of LIHTC sites that were near industrial areas and suggested that industrial zoning might be concentrated around minority neighborhoods.

*(Madison Sloan, Texas Appleseed; Amelia Adams, Texas Housers; Demetria McCain, Inclusive Communities Project; Michael Bates, Alliance of East Lubbock Neighborhood Associations)*

Staff Response: Tax Code requires that the QAP provide a priority for developments associated with community revitalization efforts; over the last several years, revisions to this section of the QAP have been made to try to ensure that they are not easy to circumvent. TDHCA’s Qualified Allocation Plan has a point structure built to incentivize developments from being sited near undesirable site and neighborhood features such as heavy industry. Further, the State, maintains the strategy of balancing new development with preservation in order to maximize affordable housing stock without displacing residents from affordable units and improving the conditions of aging stock. Finally, in Recommendation 1, the State includes encouraging development in high opportunity areas. This recommendation also includes 9 action steps that the State can take to

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<sup>4</sup> *ICP v. TDHCA*, No 3:08-CV-0546, 2016 WL 4494322 (N.D. Tex. Aug. 26, 2016)

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work toward this goal. No changes have been made to the Analysis of Impediments as a result of these comments.

Three comments related to letters of support or opposition from officials. One comment suggested that consideration should be given to the way local officials have used their power to support – or not – tax credit applications. These letters can effectively act as veto power. Another commenter noted that both local official and state official letters can stop a project completely and that this should be addressed as part of the cause of the NIMBYism that occurs.

*(Amelia Adams, Texas Housers; Christa Walikonis, Disability Rights Texas; Demetria McCain, Inclusive Communities Project)*

Staff Response: The requirement for the QAP to provide points for local government support is a state statutory requirement (Tex. Gov't Code §2306.6710(b)(1)(B)) therefore it must be included in the QAP. However, in an effort to highlight fair housing to local governments, the QAP states in this scoring item: "A municipality or county should consult its own staff and legal counsel as to whether its handling of their actions regarding such resolution(s) are consistent with Fair Housing laws as they may apply, including, as applicable, consistency with any Fair Housing Activity Statement-Texas (FHAAT) form on file, any current Analysis of Impediments to Fair Housing Choice, or any current plans such as one year action plans or five year consolidated plans for HUD block grant funds, such as HOME or CDBG funds."

### **19. Fair Housing Testing**

One comment suggested that the State include in Recommendation 4 of Chapter 11 funding for fair housing testing and enforcement of Affirmatively Furthering Fair Housing obligations on subrecipients. This comment further suggested that the state require AFFH training for all subrecipients of its funding.

*(Madison Sloan, Texas Appleseed)*

Staff Response: Funds available to perform fair housing testing are limited to those CPD funds provided to the State, and allowed to be spent on such activities.<sup>5</sup> CPD administrative funds are used for enforcement of federal and state statutes, regulations, and rules, which as applicable for Fair Housing Act complaints may be referred to the Texas Workforce Commission. Additionally, the State's CPD subrecipients do receive fair housing and AFFH training. No changes have been made to the Analysis of Impediments as a result of this comment.

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<sup>5</sup> Fair Housing Testing is an allowable public service activity with non-administrative CDBG funds. However, unlike a local entitlement community the State cannot operate its own program, and may only award funds to units of general local government that do not receive direct CDBG funding. See 24 CFR §570.480(g) Thus, the State cannot award funds under the public services category to FHIPs or FHAPs, as there are no FHAPs in Texas that are non-entitlement communities. Fair Housing Testing is not an allowable program activity in other CPD programs.



## 20. Recommended Actions

One comment stated that the Analysis of Impediments lacks metrics, timetables, and other measurable to determine the State's progress on the listed action steps. The comment further indicates that HUD's Fair Housing Planning Guide requires measurable and time-bound goals.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The Fair Housing Planning Guide is a guide not a regulation, nor does it offer any guidance on timelines or metrics. The State contends that the AI and Consolidated Plan process is on a five year cycle and, as such, the State will be seeking to progress toward the stated action steps over the five year period. The action steps themselves are the metrics that will be used to prescribe and evaluate progress. No changes have been made to the Analysis of Impediments as a result of this comment.

## 21. Steering

One comment requested that the State present detailed steps to neutralize practices that steer households to high poverty and segregated areas. Steering is the policy or practice of, either through word or action, directing those seeking housing toward an area based upon that area's overrepresentation or paucity of member of protected classes.

*(Demetria McCain, Inclusive Communities Project)*

Staff Response: The State did not receive any comments during its consultation period indicating that steering practices were occurring, nor did the State's analysis uncover any evidence of overt steering practices. However, TDHCA, via its Qualified Allocation Plan, incentivizes LIHTC developments to seek sites that are integrated and have low poverty levels. Furthermore, as the AI has focused on impediments and activities that were highly commented on, the State does not wish to direct efforts away from taking actions on the identified impediments. No changes were made to the Analysis of Impediments as a result of this comment.

## 22. TxCDBG AFFH

One comment stated that TDA requires AFFH actions only for potential housing projects.

*(Madison Sloan, Texas Appleseed)*

Staff Response: TDA disagrees with this comment. Chapter 10 of the TxCDBG Project Implementation Manual clearly requires all Grant Recipients, regardless of project type, to take action to Affirmatively Further Fair Housing prior to disbursement of any TxCDBG funding. In addition, each application for funding requires the applicant to identify those AFFH activities that have been performed and/or are planned for the future. These activities are not limited to housing-specific projects in either the application or implementation documents. No changes have been made to the AI as a result of these comments.

## 23. TxCDBG – Project Selection

One comment was in favor of requiring an AFFH review and approval for each project funded through TxCDBG, including project site selection.

*(Madison Sloan, Texas Appleseed)*

Staff Response: TDA evaluates each proposed project for compliance with the National Program Objective and activity eligibility as described by statute. HUD regulations do not require each project scope to result directly in AFFH outcomes, nor does HUD define what threshold might be used for such an eligibility standard. Rather, HUD focuses the primary eligibility of each project on assisting low- to moderate-income persons or other National Program Objectives, and separately requires the program overall to Affirmatively Further Fair Housing. TDA, in turn, requires each Grant Recipient to conduct AFFH activities. The program meets its obligation, in part, by ensuring that communities across the state have formally adopted and regularly reviewed policies and ordinances to prohibit discrimination and affirm fair housing choice, and to ensure the public is informed of their rights related to fair housing choice in each benefitting community.

Should HUD choose to introduce a defined AFFH “test” for subrecipient project selection in its basic eligibility requirements, TDA will implement the policy for all non-entitlement communities. No changes have been made to the AI as a result of these comments.

#### **24. Disaster Recovery – Distribution of Funding**

One comment was made disagreeing with the current distribution of funding under FEMA’s Hazard Mitigation Grant Program and recommending that the State step in to help smaller jurisdictions advocate for more grant funding. The commenter posited that well-connected and well-resourced jurisdictions like Houston and Harris County secure larger amounts of funding from this grant source because they have the resources to do so. Absent necessary aid from the State in applying for these funds, smaller jurisdictions will continue to fail in their acquisition of essential funds for long-term mitigation.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas General Land Office, as the primary administrator of Community Development Block Grant for Disaster Recovery (CDBG-DR) funds, continuously works with and advocates on behalf of impacted communities to ensure that long-term disaster recovery needs are properly addressed.

It should be noted that FEMA’s Hazard Mitigation Grant Program is beyond the scope of the Texas General Land Office’s duties as the administrator of CDBG-DR funds in the State of Texas. No change has been made to the AI as a result of this comment.

One comment also disagreed with the GLO’s acceptance of the South East Texas Method of Distribution as it allocated funds based solely on level of inundation and total population without considering unmet need, ability to recover, or the relative population of the impacted area.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas GLO has worked diligently with impacted areas to ensure that proposed and accepted Methods of Distribution are designed in a manner that fosters an effective and efficient recovery for the associated disaster-impact area. No change has been made to the AI as a result of this comment.

## **25. Disaster Recovery – Requirement to Benefit Low and Moderate Income Populations**

One comment was made expressing concern that the requirement that 70% of the aggregate of CDBG-DR funds be utilized to benefit the low- and moderate-income population in the disaster impact area could, potentially, be reduced to a lower overall percentage.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas General Land Office (GLO) remains committed to the administration of CDBG-DR funds in strict compliance with all applicable local, state, and federal law. The current requirement that 70% of the aggregate of all CDBG-DR funds be utilized to benefit the low- and moderate-income population in the disaster impact area is mandated by HUD and, absent any changes issued directly by HUD, will remain unchanged. The GLO shall continue to advocate on behalf of all impacted Texans as it administers disaster recovery programs within the bounds of the law. No change has been made to the AI as a result of this comment.

## **26. Disaster Recovery – Assessment Method**

One comment was made expressing concern about the methodology by which the GLO assessed unmet need in the area impacted by Hurricane Harvey. The GLO's usage of FEMA Verified Loss undercounts many low- and moderate-income disaster victims.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas GLO is committed to utilizing the most up-to-date and innovative methods of data analysis to adequately assess unmet need following a natural disaster. The GLO has recognized that there are issues with utilizing only FEMA verified loss when determining unmet need and, in an effort to resolve some of those issues, supplemented that analysis with data presented by The Social Vulnerability Index. The GLO remains open to alternative means of data collection and analysis and seeks to ensure that the unmet need of every disaster-impacted Texan properly calculated. No change has been made to the AI as a result of this comment.

## **27. Disaster Recovery – Programs**

One comment was made in favor of the creation of more disaster recovery programs that would directly benefit low- and moderate-income renters in a disaster area. They suggested that there should be a program to provide direct assistance to renters in order to aid them in being able to stay in their community while long-term recovery, i.e. the rebuilding of rental units, is ongoing.

*(Amelia Adams, Texas Housers)*

Staff Response: The Texas GLO recognizes the validity of this comment and will give it adequate consideration as disaster recovery programs continue to develop. No change has been made to the AI as a result of this comment.

## **28. Disaster Recovery – TDEM Mitigation**

One comment was made recommending that The Texas Department of Emergency Management (TDEM) develop mitigation activities and plans that include a specific consideration of fair housing and civil rights implications of how these funds are awarded, targeted, and administered.

TDEM has not participated in the Analysis of Impediments and should contribute alongside other State agencies.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The substance of this comment is beyond the scope of the Texas General Land Office. No change has been made to the AI as a result of this comment.

### **29. Disaster Recovery – Support**

One comment praised the Texas GLO for institutionalizing Affirmatively Furthering Fair Housing reviews as a part of the Community Development Block Grant for Disaster Recovery programs and commended the GLO's commitment to ensuring compliance with all federal fair housing and civil rights requirements. The GLO's statement of principles and criteria for buyout assistance is excellent.

*(Madison Sloan, Texas Appleseed)*

Staff Response: The Texas General Land Office remains committed to ensuring all disaster recovery programs are administered in full compliance with local, state, and federal laws, including all federal fair housing and civil rights requirements. No change has been made to the AI as a result of this comment.

### **30. Disaster Recovery – Hurricane Harvey**

Comments were made regarding Hurricane Harvey funding:

- a. Hurricane Ike programs run by the State offered homeowners the ability to utilize their reconstruction benefit amount to rebuild on site or, in the alternative, to voluntarily move to a safer area with less concentrated poverty and lower levels of segregation;
- b. Buyout programs must provide families with real choice and this can be accomplished through the availability of certain incentives, like those available through The Harris County Flood Control District's buyout program. To date, there are no guidelines for local buyout programs that require the use of such incentives;
- c. The Method of Distribution (MOD) process following Hurricane Harvey was flawed and the MOD submitted by Southeast Texas Regional Planning Commission failed to properly address unmet need as required by the Federal Register notice;
- d. In conducting planning activities, the GLO is encouraged to look at previously conducted studies as models. Previous planning studies, like the Colonia Drainage Study, resulted in a comprehensive overview of the areas of need and infrastructure deficiencies, particularly in disinvested communities that may lack the most basic infrastructure protection;
- e. The state-administered FEMA temporary housing programs do not help the LMI population because FEMA makes all eligibility determinations; and
- f. Affirmatively Furthering Fair Housing and Civil Rights must be incorporated into the State's Action Plan for \$4 Billion in Mitigation funds when the Federal Notice for those funds is officially published.

## Introduction

*(Madison Sloan, Texas Appleseed)*

Staff Response: The Texas General Land Office, in response to the above-listed comments, presents the following:

- a. Hurricane Ike programs allowed for homeowners to utilize their reconstruction benefit on-site or, in the alternative, to voluntarily move to a safer area. The Texas General Land Office recognizes the validity of this comment and is dedicated to exploring how the repeated usage of successful programs could benefit current disaster recovery efforts.
- b. The Texas General Land Office shall, through coordinated efforts with areas receiving direct allocations, work to ensure that all programs are administered in accordance with developed policies within all applicable federal law. As programs develop, implementation policies and supporting guidelines shall be drafted in a manner that considers all relevant factors and works to establish the most effective and efficient means for program implementation.
- c. The Method of Distribution submitted by the Southeast Texas Regional Planning Commission has been reviewed and approved by the GLO in accordance with all requirements outlined in the Federal Register notice.
- d. The Texas General Land Office remains dedicated to utilizing all relevant data and analysis, including previously conducted studies, to inform the agency as planning activities are developed.
- e. The Texas General Land Office, in its role as a State agency working to aid in the administration of a federal disaster relief program, is not charged with eligibility determinations. All eligibility determinations for FEMA Programs are the sole responsibility of FEMA and outside of the roles and responsibilities assigned to the GLO during that process. However, the GLO recognizes the issues presented in this comment and will continue to advocate for all impacted Texans during every stage of disaster response and recovery.
- f. The Texas General Land Office remains committed to ensuring that all federal disaster funding is implemented in accordance with all applicable local, state, and federal law, including all Affirmatively Furthering Fair Housing and Civil Rights laws. As with each federal disaster allocation, a detailed Action Plan shall be published to govern the administration of funds once those funds have been officially published for award in the Federal Register.

No changes have been made to the AI as a result of these comments.

## Chapter 2 - Statewide Overview of Demographics and Economic Conditions

An important step in performing the Analysis of Impediments to Fair Housing Choice is a review of statewide trends, demographics, and economic conditions. Household economics are a major factor affecting a household's ability to make housing choices. Demographics not only show important information in household sizes and attributes, but can also be considered together to identify area-specific challenges. For example, larger household sizes in an area with expensive housing stock may lead to overcrowding in parts of the state.

### Purpose of This Section

This section will provide an overview of the demographic characteristics of Texas residents that may influence housing choice and housing needs and provide information on concentrations by race, ethnicity and poverty. The section also provides information on special needs populations as defined in TDHCA's State of Texas Low-Income Housing Plan and Annual Report (SLIHP) and by the State of Texas 5-year Consolidated Plan, as defined in 24 CFR §91.305. These special needs populations include the following groups: persons experiencing homelessness, elderly persons, persons with disabilities (mental, physical, and developmental), persons with substance use disorders, persons living with HIV/AIDS and their families, persons with Violence Against Women Act (VAWA) protections, residents of Colonias, farmworkers, residents of public housing, youth aging out of foster care, and veterans and wounded warriors.

### Organization, Definitions, and Data Sources

This chapter provides an overview of the state as a whole. Chapter 5 further evaluates these resources to provide regional profiles which include county-level data. The primary data sources for this chapter are the U.S. Census Bureau's five-year American Community Survey (2012-2016), the Texas Demographic Center Population Projections Project, the U.S. Census Bureau's 2010 Decennial Census, and HUD's Comprehensive Housing Affordability Strategy Data (2010-2014). Within the state summary, data for metro and non-metro areas are reported separately where relevant and available. One limitation of the available data is that the definitions of "disability" used by the data sets is not identical to the definition given in the Fair Housing Act (FHA).

*"[The FHA] defines persons with a disability to mean those individuals with mental or physical impairments that substantially limit one or more major life activities. The term mental or physical impairment may include conditions such as blindness, hearing impairment, mobility impairment, HIV infection, mental retardation, alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness. The term major life activity may include seeing, hearing, walking, breathing, performing manual tasks, caring for one's self, learning, speaking, or*

*working. The Fair Housing Act also protects persons who have a record of such an impairment, or are regarded as having such an impairment.”<sup>6</sup>*

## **Racially or Ethnically Concentrated Areas of Poverty**

HUD has developed a census tract-based definition of Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs<sup>7</sup>). The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50% or more of the tract’s total population. The poverty threshold is defined by HUD as neighborhoods of extreme poverty which are census tracts in which 40% or more of the individuals in the tract are living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this poverty threshold with an alternate criterion; that criterion would also classify a tract as a R/ECAP if the tract’s rate of individuals in poverty is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts which meet one of the two thresholds for extreme poverty, and also satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. It should be noted that HUD’s methodology for R/ECAPs includes only racial and ethnic minorities; it does not contemplate white racially concentrated areas of poverty. For more detailed information on R/ECAPs, please see Appendix D

## **TDHCA Service Regions**

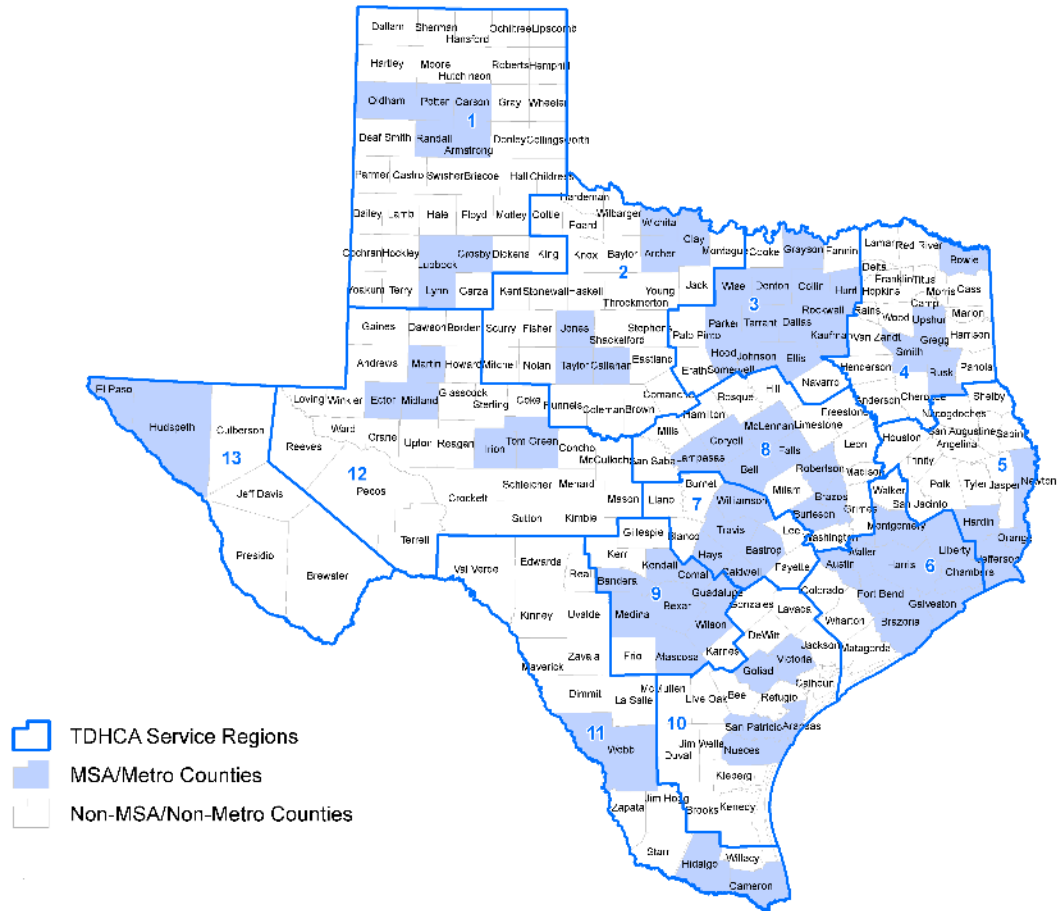
Figure 2-1 displays the 13 TDHCA uniform state service regions and the counties they contain. The AI divides the state into those 13 regions to analyze regional data and trends.

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<sup>6</sup> The Department of Justice. “The Fair Housing Act”, updated December 21, 2017. <<https://www.justice.gov/crt/fair-housing-act-1#disability>>.

<sup>7</sup>AFFH-T Data Documentation, Data Version AFFHT0004, November 2017. <<https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf>>

Figure 2-1: State of Texas Regional Map



The Office of Management and Budget (OMB), which is responsible for creating and maintaining geographic statistical areas, defines a Metropolitan Statistical Area (MSA) as:

*“a Core Based Statistical Area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.”<sup>8</sup>*

Any county that is identified by the OMB in April 2018 as being in an MSA is considered to be a Metro county in the AI analysis, and throughout this document. Any county outside of an MSA is considered to be a Non-Metro county.

<sup>8</sup> Federal Register Part IV, Volume 75, Number 123, 37252. Monday, June 28, 2010.



## Statewide Demographic Data

### State of Texas Population Growth

Between 2000 and 2010 the population of Texas grew by 21% (4.3 million residents)—more than twice the rate of growth for the U.S. as a whole (10%). Since 2010, Texas has continued to experience robust population growth. Yearly population estimates indicate that between 2010 and 2017 the population of Texas grew by 12.1% (3 million residents). This population growth is primarily through a combination of natural population increase and net migration. According to the U.S. Census Bureau for each year between 2010 and 2016, the state of Texas has had the nation’s largest annual population growth. The state’s major metropolitan statistical areas (Austin-Round Rock, Dallas-Fort Worth-Arlington, Houston-The Woodlands-Sugar Land, and San Antonio-New Braunfels) are leading areas of population growth in Texas.<sup>9</sup>

### Race and Ethnicity

Figure 2-2 shows the Diversity Index by Census tract for the State of Texas. The Diversity Index is a metric designed to measure how equally distributed races and ethnicities are in a particular area. Mathematically, the index can range from zero to one, in which zero would represent an area where every person was the same race and ethnicity, while a score of one would represent an area where every person was a different race and ethnicity. In short, the more evenly distributed people are as it relates to race and ethnicity in an area, the closer to a score of one the diversity index would get. It should be noted that, while mathematically possible to achieve a score of one, in reality it would be impossible to achieve a diversity score of one because the number of race and ethnicity options measured by ACS data are not unlimited. The ACS provides data for race in seven different categories (White, Black and African American, Asian, American Indian and Alaskan Native, Hawaiian and Other Native Pacific Islander, Some Other Race Alone, and Two or More Races) and ethnicity in two categories (Hispanic or Latino Origin and Not Hispanic or Latino Origin). For more information on the diversity index and to see its mathematical form, please see Appendix E For the purposes of clarity, the Diversity Index is used in lieu of other theoretical metrics due to it being relatively simple and easily understood. The Diversity Index is calculated for each Census tract. A higher Diversity Index score means that the tract’s racial and ethnic composition is more evenly distributed between racial and ethnic groups while a lower score means that there is a concentration in the tract of only a few racial and ethnic groups.

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<sup>9</sup> United States Census Bureau. “Births and Migration Push Population to Nearly 28 Million.”

<<https://www.census.gov/library/stories/2017/08/texas-population-trends.html>>

**Figure 2-2: Diversity Index by Census Tract, Texas**

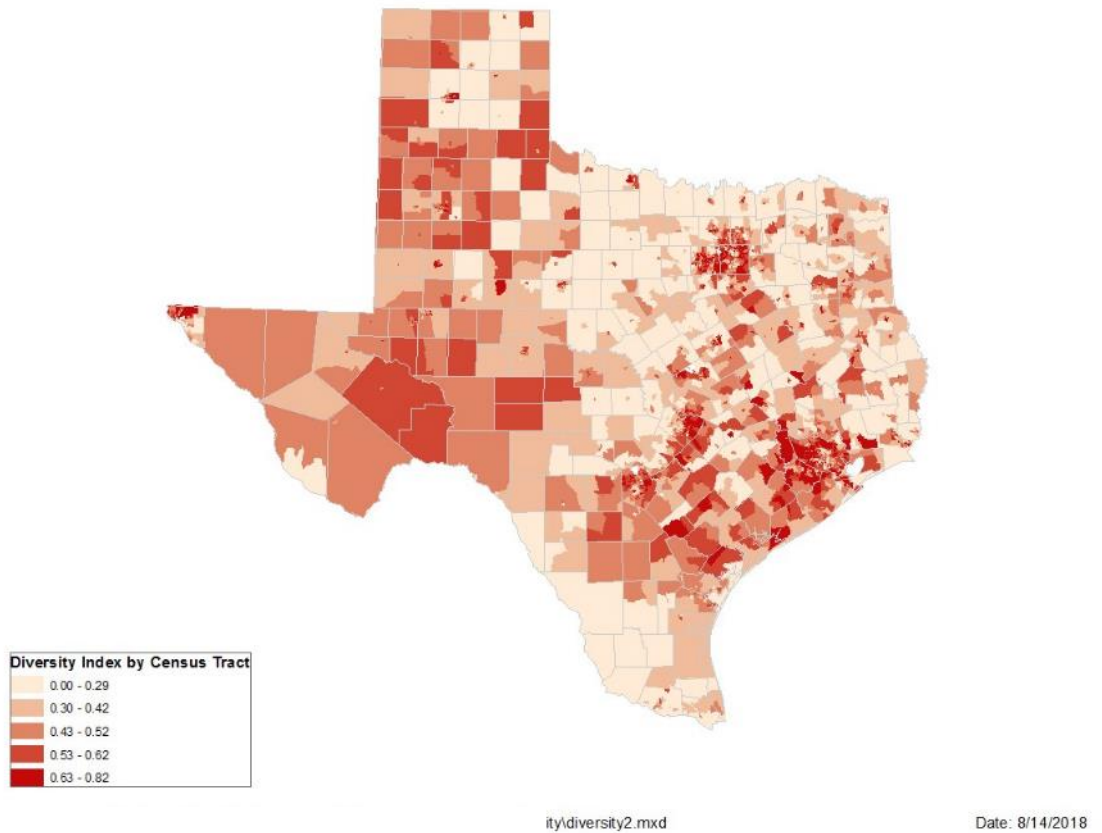


Figure 2-3 displays the population estimates for Texas by race and ethnicity in 2010 and 2018, and population projections for 2020, 2030, 2040 and 2050. These projections reveal that the White population is expected to remain fairly consistent in raw numbers, with the percentage White population gradually decreasing, the Black population increasing slightly, the Other population almost doubling, and the Hispanic population increasing significantly from 9.4 million in 2010 to an estimated 21.5 million in 2050. All population projections in the AI used the Texas Demographic Center’s (TDC) half migration scenario, which assumes that the migration rate (population change excluding birth and death rates) from 2000 to 2010 will continue at half of its rate from 2010 to 2050. This is the scenario that TDC recommends when looking at long term population projections. In January 2019, the TDC further refined their migration scenario, using the migration rate from 2010 to 2015. In the 2010 to 2015 scenario, the Texas population is predicted to grow by an additional 7 million individuals statewide over the half-migration scenario.<sup>10</sup>

<sup>10</sup> Texas Demographic Center. Texas Population Projections 2010 to 2050. January 2019. <  
[http://demographics.texas.gov/Resources/publications/2019/20190128\\_PopProjectionsBrief.pdf](http://demographics.texas.gov/Resources/publications/2019/20190128_PopProjectionsBrief.pdf) >

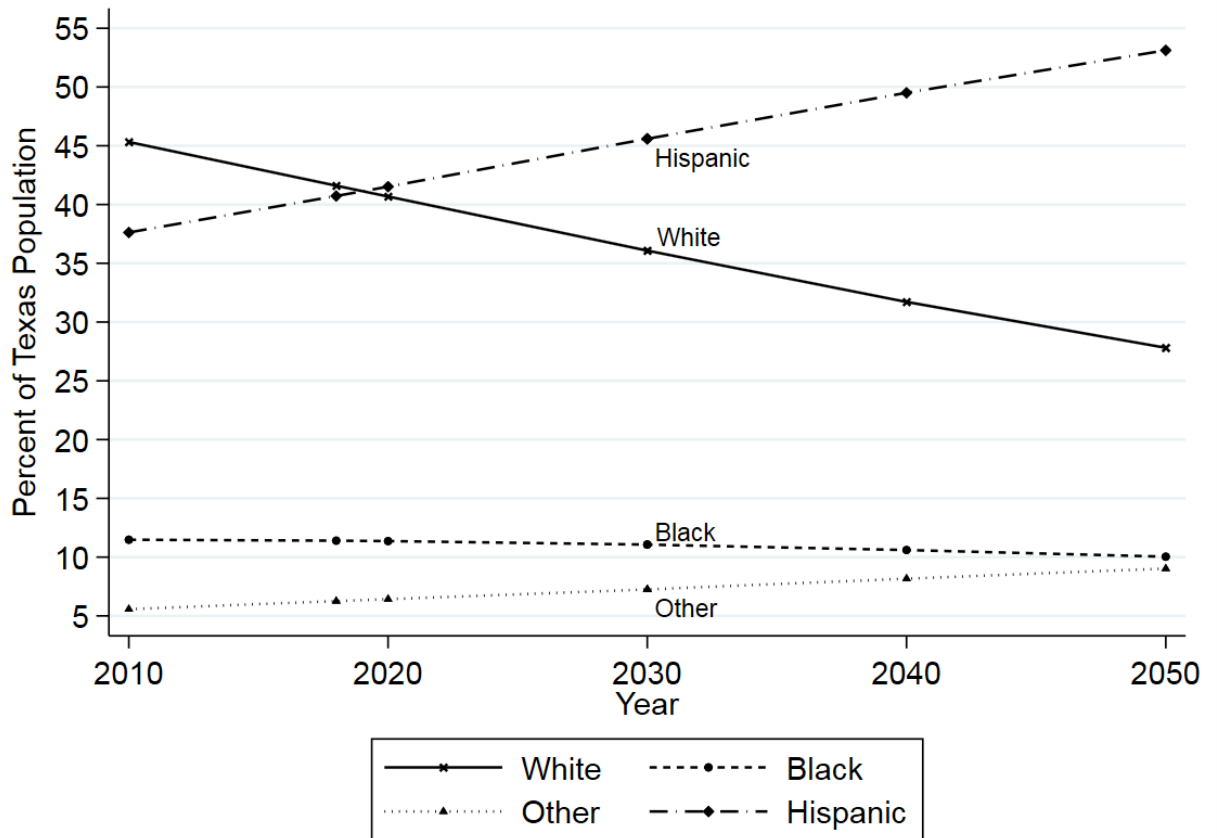
**Figure 2-3: Population Projections by Race and Ethnicity, Texas, 2010 to 2050**

	2018	2010	2020	2030	2040	2050
<b>White</b>	11,674,950	11,397,345	11,723,184	11,792,588	11,593,202	11,265,371
<b>Growth</b>			2.86%	0.59%	-1.69%	-2.83%
<b>Black</b>	3,199,578	2,886,825	3,274,738	3,616,745	3,876,830	4,065,757
<b>Growth</b>			13.44%	10.44%	7.19%	4.87%
<b>Other</b>	1,756,663	1,400,470	1,851,409	2,369,978	2,984,989	3,655,259
<b>Growth</b>			32.20%	28.01%	25.95%	22.45%
<b>Hispanic</b>	11,428,226	9,460,921	11,963,951	14,900,906	18,095,574	21,516,362
<b>Growth</b>			26.46%	24.55%	21.44%	18.90%

Source: Texas Demographic Center, Population Projections Project, Data as of 6/18/18.

Note: Texas Demographic Center projections include Hispanic as a race, not an ethnicity.

**Figure 2-4: Population Projections by Race and Ethnicity as a Percentage of State Population, Texas, 2010 to 2050**



Source: Texas Demographic Center, Population Projections Project, Data as of 6/18/18.

Note: Texas Demographic Center projections include Hispanic as a race, not an ethnicity.

Figure 2-4 plots the population projections of Texas by race and ethnicity as a percentage of the state population from 2010 through 2050. In 2010, Texas was already a majority-minority state, meaning that minority populations together were greater than 50% of the population as a whole.

By 2020, the TDC projects that Hispanics will be the largest population in the state and that by 2050, Hispanics will make up more than half of the Texas population. Almost all of this demographic trend will be as a result of an aging White population.

### Age

As is the case in many states, the population of Texas is aging. In 2010, the median age was 34.5; by 2016 the median age had increased almost two years to 34.2 years. Before 2050, the population of Texans aged 64 to 84 years is expected to more than double and the population of Texans aged 85 and older is expected to more than triple. Figure 2-5 displays the projected population sizes, for age groups under 18 years, 18 to 24 years, 25 to 44 years, 45 to 64 years, 64 to 84 years and 85 years and older.

**Figure 2-5: Population Growth by Age Group, Texas, 2010 to 2050**

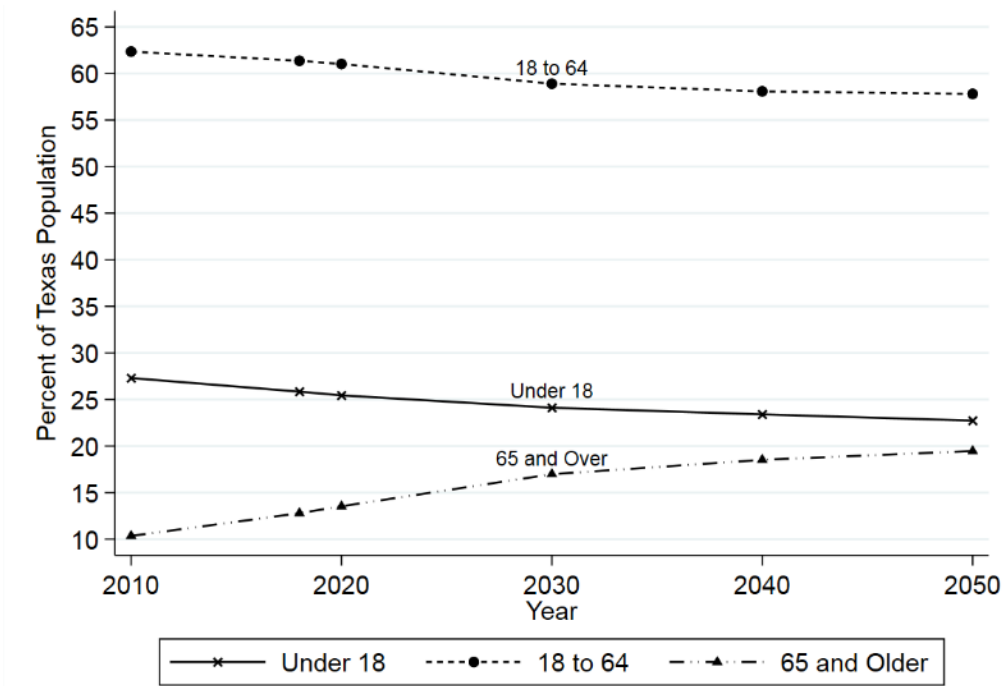
Age Group	2018	2010	2020	2030	2040	2050
<b>Under 18 Years</b>	7,251,938	6,865,824	7,332,021	7,882,049	8,553,347	9,207,545
<b>18 to 24 Years</b>	2,801,971	2,572,969	2,879,390	3,094,071	3,315,888	3,648,314
<b>25 to 44 Years</b>	7,630,222	7,071,855	7,805,278	8,715,998	9,615,093	10,389,536
<b>45 to 64 Years</b>	6,785,736	6,033,027	6,897,741	7,439,388	8,297,330	9,374,969
<b>65 to 84 Years</b>	3,202,708	2,296,707	3,490,399	4,948,291	5,750,616	6,411,087
<b>85 Years and Older</b>	386,842	305,179	408,453	600,420	1,018,321	1,471,298
<b>Total Texas Population</b>	<b>28,059,417</b>	<b>25,145,561</b>	<b>28,813,282</b>	<b>32,680,217</b>	<b>36,550,595</b>	<b>40,502,749</b>

Source: Texas Demographic Center, Population Projections Project, Data as of 6/18/18.

At current growth rates and assuming a 0.5 migration scenario as mentioned above as recommended by the TDC, Texas will be getting older. When looking at this data as percentages of the population, the percentage of the population over the age of 85 is expected to more than double while the percentage of those aged 65 to 84 is expected to increase more than 50%. At the same time, every other age group (those 64 and younger) will experience declines in the percentage of the population that they constitute, most of which will be driven by losses in those under 45 years old. This is going to place strains on accessible housing stock, assisted living stock, and other senior housing.

Figure 2-6 shows projected population growth by age group as a percentage of the state’s population according to the Texas Demographic Center.

**Figure 2-6: Population Projections by Age Group as a Percentage of State Population, Texas, 2010 to 2050**



Source: Texas Demographic Center, Population Projections Project, Data as of 6/18/18.

### Household Composition

In the American Community Survey, the Census Bureau recognizes two different types of households: family and non-family. Families and family households are defined by the Census Bureau as:

*“A family consists of a householder and one or more other people living in the same household who are related to the householder by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of his or her family. A family household may contain people not related to the householder, but those people are not included as part of the householder’s family in tabulations. Thus, the number of family households is equal to the number of families, but family households may include more members than do families. A household can contain only one family for purposes of tabulations. Not all households contain families since a household may be comprised of a group of unrelated people or of one person living alone – these are called nonfamily households. Families are classified by type as either a “married-couple family” or “other family” according to the sex of the householder and the presence of relatives. The data on family type are based on answers to questions on sex and relationship that were asked of all people.”<sup>11</sup>*

<sup>11</sup> United States Census Bureau, American Community Survey and Puerto Rico Community Survey 2017 Subject Definitions. [https://www2.census.gov/programs-surveys/acs/tech\\_docs/subject\\_definitions/2017\\_ACSSubjectDefinitions.pdf](https://www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2017_ACSSubjectDefinitions.pdf).

A non-family household is defined as:

*“A householder living alone or with nonrelatives only. Unmarried couples households, whether opposite-sex or same-sex, with no relatives of the householder present are tabulated in nonfamily households.”<sup>12</sup>*

The AI examines all households and family households. Family households are more likely to include a minor and to be subject to familial status protections under the Fair Housing Act.

In 2016, approximately 37.6% of all Texas households were families with children under age 18. The average non-family household size is 1.28, whereas the average family household size, both single parent and two-parent households was 3.44. Figure 2-7 displays the state’s 2016 household composition.

**Figure 2-7: Household Composition, Texas, 2012 to 2016**

<b>Average Household Size</b>	2.84
<b>Average Family Household Size</b>	3.44
<b>Average Non-Family Household Size</b>	1.28
<b>Percent of Households with a Minor</b>	37.6%

Source: 2012-2016 American Community Survey, Tables S2501 and S1101.

Of the 9.3 million households in Texas, almost 70% are family households, with family household sizes ranging from two person households to seven or more person households. Texas households are diverse in number; this is an important consideration in housing availability and choice as households with large household sizes may find it difficult to find sufficiently sized rental housing stock and affordable housing stock. The large portion of the state being comprised of family households affirms the need for a diverse portfolio of affordable housing options in Texas. Figure 2-8 shows Texas household types and sizes in 2016.

**Figure 2-8: Household Types and Sizes, Texas, 2012 to 2016**

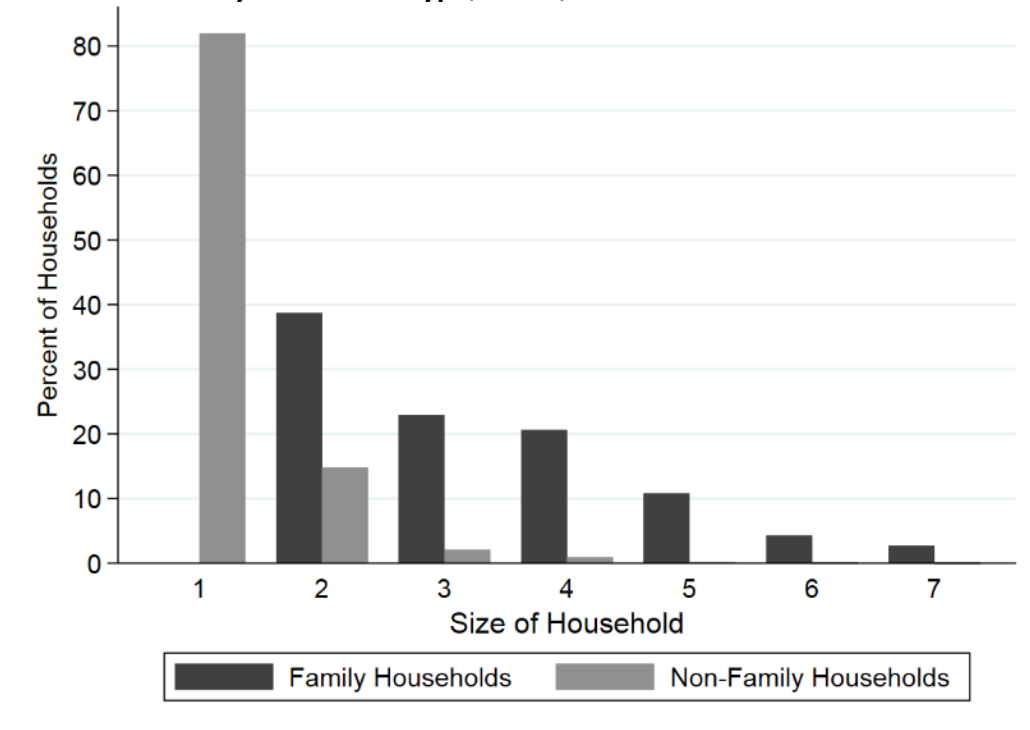
<b>Household Size</b>	<b>Family</b>	<b>Non-Family</b>
<b>Total Households</b>	6,450,049	2,839,505
<b>1-person household</b>	-	82.00%
<b>2-person household</b>	38.70%	14.80%
<b>3-person household</b>	22.90%	2.10%
<b>4-person household</b>	20.60%	0.90%
<b>5-person household</b>	10.80%	0.20%
<b>6-person household</b>	4.30%	0.05%
<b>7-or-more person household</b>	2.70%	0.03%

Source: 2012-2016 American Community Survey, Table B11016.

<sup>12</sup> United States Census Bureau, American Community Survey and Puerto Rico Community Survey 2017 Subject Definitions. <[https://www2.census.gov/programs-surveys/acs/tech\\_docs/subject\\_definitions/2017\\_ACSSubjectDefinitions.pdf](https://www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2017_ACSSubjectDefinitions.pdf)>

The vast majority of non-family households consist of only one individual (more than 80%), while among family households approximately 80% of the households are represented by 2, 3 and 4 member households. This data indicates that there is a need for 1-bedroom units, and a need for larger units to provide for families with household sizes greater than two. Figure 2-9 shows household size by household type in 2016.

**Figure 2-9: Household Size by Household Type, Texas, 2012 to 2016**



Source: 2012-2016 American Community Survey, Table B11016.

### Disability

There are more than three million Texans with a disability (11.6% of the total non-institutionalized state population) and a significant number of persons with disabilities face extreme housing needs. The 2011-2015 ACS data show that 17.5% of individuals who live below the poverty level in Texas have a disability, while 8.8% of individuals who live at or above the poverty level have a disability. As demonstrated by Figure 2-10, which shows disability types by age group, seniors are much more likely to have a disability than non-seniors. For non-seniors, ambulatory and cognitive disabilities are the most common type of disability. Persons with disabilities face challenges finding housing that is affordable, accessible, and located near transit and supportive services.

**Figure 2-10: Disability Type by Age Group in Texas, 2012 to 2016**

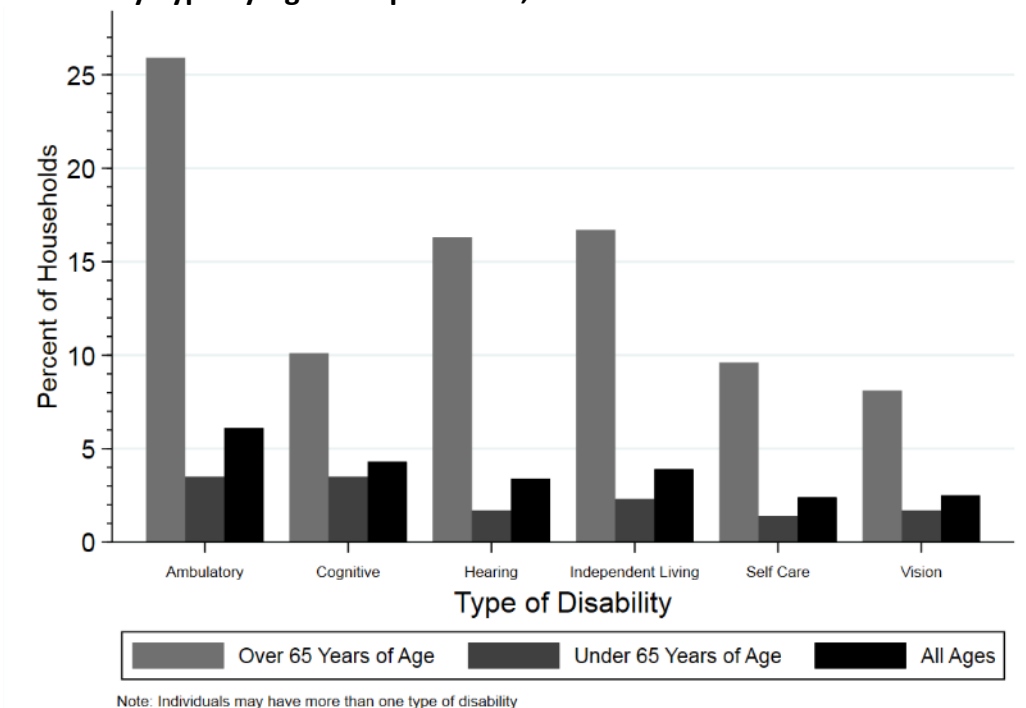
Disability Type	65 Years and Over	Under 65 Years	All Ages
Ambulatory	25.9%	3.8%	6.5%
Cognitive	10.1%	3.8%	4.6%
Hearing Difficulty	16.3%	1.7%	3.4%
Independent Living	16.7%	3.2%*	5.3%
Self-Care	9.6%	1.4%	2.5%
Vision Difficulty	8.1%	1.7%	2.5%
Any Disability	39.1%	8.1%	11.6%

Source: 2012-2016 American Community Survey, Table S1810.

Note: Individuals may have more than one disability type.

\*The ACS does not provide estimates for the number of residents under 18 with an Independent Living disability. The state’s proportion of persons with a disability (11.6%) is largely driven by the population over age 65. Two out of every five persons 65 and over have at least one disability. More than 25% of the population over 65 has an ambulatory disability, further highlighting the need for accessible units and access to accessible transportation options. When considered in combination with the aging nature of Texas’s projected population, the incidence of disability is likely to increase over the coming decades. Figure 2-11 demonstrates disability types by age group (Note: Figure 2-11 is the visual representation of Figure 2-10).

**Figure 2-11: Disability Type by Age Group in Texas, 2012 to 2016**



Source: 2012-2016 American Community Survey, Table S1810.

Note: Individuals may have more than one disability type.



## Economic Data

### Income

The median household income of Texans was \$54,727 in 2012-2016, slightly lower than the national median of \$55,322. More than one in five Texas households earn less than \$25,000 per year and nearly one in three families earns less than \$35,000 per year. Figure 2-12 displays the 2016 income distribution by household type in Texas. It should be noted that the number of households reflected for each income band is a discrete total, however the percentage of households and percent of families are not discrete to each income band, but are cumulative so that each percentage shown reflects the percentage calculated based on the total households for that row plus all households from lower incomes as well.

**Figure 2-12: Income by Household Type, Texas 2012 to 2016**

	Households	Percent of Households at or Below Income Group	Families	Percent of Families at or Below Income Group
Less than \$10,000	644,199	6.9%	306,138	4.7%
\$10,000 to \$14,999	457,750	11.9%	217,159	8.1%
\$15,000 to \$19,999	469,854	16.9%	259,521	12.1%
\$20,000 to \$24,999	490,569	22.2%	287,428	16.6%
\$25,000 to \$29,999	469,817	27.3%	298,924	21.2%
\$30,000 to \$34,999	472,587	32.3%	298,593	25.9%
\$35,000 to \$39,999	436,692	37.0%	286,544	30.3%
\$40,000 to \$44,999	431,486	41.7%	286,128	34.7%
\$45,000 to \$49,999	382,311	45.8%	258,729	38.7%
\$50,000 to \$59,999	737,074	53.7%	502,078	46.5%
\$60,000 to \$74,999	920,198	63.6%	663,360	56.8%
\$75,000 to \$99,999	1,102,563	75.5%	855,772	70.1%
\$100,000 to \$124,999	775,702	83.9%	637,252	80.0%
\$125,000 to \$149,999	471,427	88.9%	399,884	86.2%
\$150,000 to \$199,999	496,104	94.3%	428,870	92.8%
\$200,000 or more	531,221	100.0%	463,669	100.0%
<b>Total Households</b>	<b>9,289,554</b>	-	<b>6,450,049</b>	-

Source: 2012-2016 American Community Survey, Table DP03.

HUD sets maximum income limits that determine eligibility for its assisted housing programs including Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

*More than half of Texas households live below 100% of HUD’s Area Median Family Income (AMFI); of those households, four out of five are low income with incomes at or below 80% AMFI, and a quarter of those households are very low income with incomes at or below 50% AMFI. All in all, more than one in ten Texas households is classified as extremely low income with incomes at 30% AMFI or less. This supports the continued need for affordable units for low income, very low income, and extremely low income households.*

Figure 2-13 displays the number and percent of households in HUD’s Area Median Family Income Groupings.

**Figure 2-13: Households at Area Median Family Income Groupings, Texas, 2010 to 2014**

Income Grouping	Household Count	Percent
0 to 30% AMFI	1,172,048	13.0%
30 to 50% AMFI	1,096,585	12.2%
50 to 80% AMFI	1,514,051	16.8%
80 to 100% AMFI	860,693	9.5%
>100% + AMFI	4,370,194	48.5%
Total	9,013,571	100.0%

Source: HUD Comprehensive Housing Affordability Strategy Data, 2010-2014, Table 8.

Figure 2-14 displays median income by household and family size.

**Figure 2-14: Median Income by Household and Family Size, Texas, 2012 to 2016**

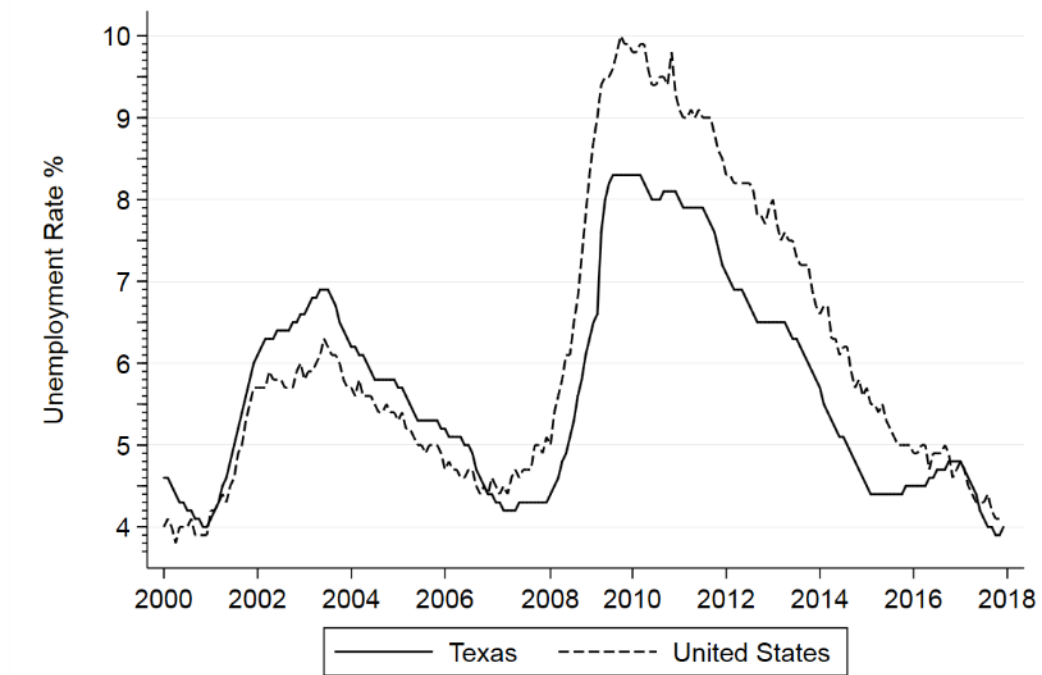
Family Size	Median Income (dollars)
All Households	54,727
1-Person Households	30,738
All Families	64,585
2-Member Families	60,506
3-Member Families	64,571
4-Member Families	74,896
5-Member Families	66,611
6-Member Families	62,062
7+ Member Families	63,792

Source: 2012-2016 American Community Survey, Tables B19119 and B19019.

## Employment

Since 2007, the unemployment rate in Texas has generally been lower than the national unemployment rate. In 2015, Texas began seeing an increase in unemployment; however that increase was slight and in 2017, the unemployment rate continued to drop. At the end of 2017, the unemployment rate for Texas and the United States was 4% and 4.1% respectively, some of the lowest experienced since the early 2000s. Figure 2-15 graphs the unemployment rate in Texas and the United States from 2000 to 2017.

**Figure 2-15: Unemployment Rate in Texas and the United States, 2000 to 2017**



Source: United States Bureau of Labor Statistics.  
 Note: Year labels indicate the unemployment rate for January of that year.

The largest job sector in the State of Texas is Trade, Transportation and Utilities which supports 2.5 million jobs statewide, or 20% of total nonfarm employment. The next largest employment sectors include Government (15% of nonfarm jobs), Education and Health Services (14%) and Professional and Business Services (14%).

**Poverty**

According to the U.S. Census Bureau, a person’s poverty status is determined by comparing the person’s total family income with the poverty threshold appropriate for that person’s family size and composition. If the total income of that person’s family is less than the poverty threshold appropriate for that family, then the person is considered to be in poverty, together with every member of his or her family. If a person is not living with anyone related by birth, marriage or adoption, then the person’s own income alone is compared with the poverty threshold for a one-person household. The same procedure applies for calculating households in poverty. In 2017, the federal poverty threshold for a family of four was \$25,283, for a single householder under the age of 65 was \$12,752, and for a single householder aged 65 or older was \$11,756. Figure 2-16 displays the poverty rate by age, race/ethnicity, disability and family status.

**Figure 2-16: Poverty Status for Population for Whom Poverty Status Can Be Determined, Texas, 2012 to 2016**

	<b>Total</b>	<b>In Poverty</b>	<b>Poverty Rate</b>
<b>State of Texas</b>	26,334,005	4,397,307	16.7%
<b>Poverty By Age</b>			
Children under 5	1,946,154	508,487	26.1%
Children under 18	7,048,643	1,685,859	23.9%
Seniors (65 and older)	3,008,037	326,261	10.8%
<b>Poverty by Race/Ethnicity</b>			
American Indian and Alaskan Native	124,076	26,264	21.2%
Asian	1,160,922	129,228	11.1%
Black or African American	3,081,576	697,386	22.6%
Native Hawaiian and Other Pacific Islander	21,661	3,024	14.0%
White	19,756,685	3,054,970	15.5%
Some other race	1,533,580	373,974	24.4%
Two or more races	655,505	112,461	17.2%
Hispanic or Latino Origin (of any race)	10,218,274	2,468,927	24.2%
<b>Poverty by Disability Status</b>			
Total Population with a Disability	3,072,974	669,908	21.8%
Population Under 5 years with a Disability	14,422	3,642	25.3%
Population 65 and over with a Disability	1,261,270	172,528	13.7%
In Family Households	22,683,337	3,511,723	15.5%

Source: 2012-2016 American Community Survey, Tables S1701, S1703, and B17021; 2016 American Community Survey, Table B18130.

16.7% of all Texans live in poverty; however, higher poverty rates are seen disproportionately in different subsets of the population. Almost one quarter of minors live in poverty (26.1% for children under 5, and 23.9% for children under 18). Individuals with a disability also experience poverty at a higher rate (21.8%) than the general population. Among minorities, poverty is highest for persons of Hispanic or Latino origin (24.2%) and Black or African American race (22.6%).

## Special Needs Populations Data

Special needs populations, as identified in the 2018 State of Texas Low Income Housing Plan and Annual Report (SLIHP), include elderly persons, farmworkers, persons experiencing homelessness, persons living with HIV/AIDS and their families, persons with disabilities (mental, physical, and developmental), persons with substance use disorders, persons with Violence Against Women Act (VAWA) protections, residents of colonias, residents of public housing, Veterans and wounded warriors, and youth aging out of foster care. The special needs populations identified in the State of Texas 5-year Consolidated Plan are all included with additional populations identified in the Department’s SLIHP in order to provide a fuller

understanding of the State’s special needs populations. Estimates of the proportions and numbers of special needs residents in Texas follow.

### Persons Experiencing Homelessness

According to the 2017 Point-in-Time count compiled by HUD of sheltered and unsheltered persons experiencing homelessness, there are 23,548 homeless persons in Texas. Texas is one of five states that together accounted for half of the nation’s population experiencing homelessness in 2017 with 4% of the national total in Texas. Between 2016 and 2017, Texas saw the fifth largest percentage increase (1.8%) of all states. However, between 2007 and 2017, Texas saw the largest percentage decrease (40.8%) in the number of people experiencing homelessness compared to other states. Figure 2-17 shows the breakdown of homeless subpopulations including the chronically homeless, those with severe mental illness, those with chronic substance abuse issues, veterans, persons with HIV/AIDS, and survivors of domestic violence.

**Figure 2-17: Homeless Populations, Texas, 2017**

Homeless Subpopulations	Sheltered	Unsheltered	Total
Chronically Homeless	1,481	2,230	3,711
Severely Mentally Ill	2,562	2,571	5,133
Chronic Substance Use Issues	1,969	2,404	4,373
Veterans	1,379	821	2,200
Persons with HIV/AIDS	166	176	342
Survivors of Domestic Violence	2,593	1,175	3,768

Source: U.S. Department of Housing and Urban Development Point in Time Count and Housing Inventory Count, 2017.

Note: Individuals can be members of multiple subpopulations, so the subtotals may not add up to the total number of homeless in Texas.

### Elderly Persons

In 2012-2016, 11.5% of Texans, totaling more than three million residents, were age 65 or older. Of all elderly Texans (aged 55 and over), about 85% live in metro counties and about 15% live in non-metro counties. Figure 2-18 displays the population of elderly persons in Texas. Figure 2-20 shows the population that is 65 and over with a disability, an approximation for frail elderly, as defined in 24 CFR 91.305. Discussion of frail elderly is included in the AI because of this particular group’s possible need for supportive housing.

**Figure 2-18: Persons Aged 55, 62, and 65 Years Old and Over in Texas, 2012 to 2016**

	Non-Metro	Metro	Total	Percent of Statewide Population
<b>55 and Over</b>	904,000	5,157,000	6,061,000	22.5%
<b>62 and Over</b>	627,000	3,248,000	3,876,000	14.4%
<b>65 and Over</b>	520,000	2,577,000	3,098,000	11.5%

Source: 2012-2016 American Community Survey, Table S0101.

Note: Census estimates for the number of residents were not available for all age groups. Numbers are rounded to the nearest thousand to compensate for this discrepancy.

### Persons with Disabilities (Mental, Physical, and Developmental)

As discussed earlier in this chapter, 11.6% of Texas residents - more than 3 million people - have some type of disability. According to Figure 2-19, of those Texans with disabilities, approximately 81.8% live in urban areas. Persons with disabilities are more likely to be living in urban areas due to their ability to access transportation and the close proximity to health related and other services and supports.<sup>13</sup> This subpopulation is included in the AI because of this particular group's possible need for supportive housing.

**Figure 2-19: Persons with Disabilities, Texas, 2012 to 2016**

Non-Metro	Metro	Total Non-Institutionalized Civilian Population	Percent of Civilian Non-Institutionalized Population with a Disability
484,325	2,598,816	3,083,141	11.6%

Source: 2012-2016 American Community Survey, Table S1810.

There are 1.6 million persons aged 18-64 years with a disability, which is 9.8% of that age group. There are just over one quarter of a million children aged 5-17 years with a disability in Texas, which is 5.5% of that age group. There are approximately 1.2 million persons 65 years and older with a disability, which is 39.1% of that age group. Figure 2-20 shows the age breakdown of persons with disabilities as compared to the total population.

**Figure 2-20: Persons with Disabilities as a Percentage of Total Population in Texas, 2012 to 2016**

	Population with a Disability	Total Non-Institutionalized Population	Percent of Non-Institutionalized Population with a Disability
<b>Under 5 Years</b>	16,387	1,970,499	0.8%
<b>5 to 17 Years</b>	281,123	5,151,301	5.5%
<b>18 to 64 Years</b>	1,608,392	16,349,031	9.8%
<b>65 Years and Over</b>	1,177,239	3,008,037	39.1%
<b>Total</b>	3,083,141	26,478,868	11.6%

Source: 2012-2016 American Community Survey, Table S1810.

### Persons with Substance Use Disorders

The 2015-2016 National Survey on Drug Use and Health (NSDUH) estimates that 6.9% of Texans 18 or older were dependent on or abused an illicit drug or alcohol in the past year. This is slightly lower than the national estimate of 7.9%.<sup>14</sup> Alcohol and substance use issues can be linked to housing problems, including homelessness. Many individuals with substance use issues face

<sup>13</sup> Housing and Health Services Coordination Council meeting transcript, Testimony before the Housing & Health Services Coordination Council Public Forum < <http://www.tdhca.state.tx.us/hhsc/docs/10-PublicForumsTranscript-Austin.pdf>.>

<sup>14</sup> NSDUH, (2015-2016). 2015-2016 National Survey on Drug Use and Health: Model-Based Prevalence Estimates (50 States and the District of Columbia), <<https://www.samhsa.gov/data/sites/default/files/NSDUHsaePercents2016/NSDUHsaePercents2016.pdf>.>

multiple barriers to accessing housing while suffering from addiction. Housing first programs, which are programs that seek to stably house a homeless individual with a substance use disorder without or before requiring treatment, do not increase the likelihood of an individual to continue heavy alcohol or drug use, even though those without housing reported higher rates of psychiatric and substance use treatment.<sup>15</sup> The Fair Housing Act protects persons who are recovering from substance abuse. It does not protect persons who are currently engaging in the current illegal use of controlled substances. It would be illegal under the FHA to refuse to rent to someone solely on the basis of their status as a recovering substance user. However, some factors in finding a unit, such as an individual’s credit or criminal history, may be impacted by their substance abuse related disability making their ability to find housing more challenging. This subpopulation is included in the AI because of this particular group’s possible need for supportive housing.

### Persons Living with HIV/AIDS and Their Families

Human Immunodeficiency Virus (HIV) is the virus that causes Acquired Immunodeficiency Syndrome (AIDS). HIV infects cells and attacks the immune system, which weakens the body and makes it especially susceptible to other infections and diseases. Because of increased medical costs, the loss of the ability to work and earn income, or stigma, people with HIV/AIDS may be at risk of losing their housing arrangements. Although the number of Texans living with HIV rises each year, Texas has seen a steep decline in the number of deaths among persons with HIV. As reported by the Texas Department of State Health Services, there were 82,745 Texans living with a diagnosed HIV infection at the end of 2015 and 86,669 Texans living with a diagnosed HIV infection at the end of 2016.<sup>16</sup> Figure 2-21 shows the number of persons living with HIV in Texas. Persons living with HIV/AIDS may be considered disabled if the disease substantially limits at least one major life activity, the person has a record of an impairment, or is regarded as having an impairment. This subpopulation is included in the AI because of this particular group’s possible need for supportive housing.

**Figure 2-21: Persons Living with HIV in Texas, 2016**

State	Persons with HIV-Rural <sup>17</sup>	Persons with HIV-Urban	Total Persons with HIV <sup>18</sup>	2012-2016 Total Population	Percent of Persons with HIV to Statewide Population
Total	3,922	78,550	86,669	26,956,435	0.33%

Source: Texas Department of State Health Services, 2017.

<sup>15</sup> Padgett, Deborah K, Leyla Gulcur, and Sam Tsemberis. Housing First Services for People Who Are Homeless with Co-Occurring Serious Mental Illness and Substance Abuse. Research on Social Work Practice, Vol. 16 No. 1, January 2006. <<https://bobcat.militaryfamilies.psu.edu/sites/default/files/placed-programs/2006%20Padgett,%20Gulcur,%20&%20Tsemberis.pdf>>

<sup>16</sup> Texas Department of State Health Services. (2017, July 25). Texas HIV surveillance report: 2016 Annual Report. <<http://www.dshs.state.tx.us/hivstd/reports/>>

<sup>17</sup> Due to the way this data were aggregated to protect the anonymity of the subject, urban and rural is used here instead of metro and non-metro.

<sup>18</sup> The 4,197 people counted in Texas Department of Criminal Justice facilities, Federal Prison facilities, and Federal Immigration and Customs Enforcement facilities are not attributed to a geographic area.

Note: Figures do not include those unaware of their HIV infection or those who tested HIV positive solely through an anonymous HIV test.

### Persons with Violence against Women Act (VAWA) Protections

Persons with VAWA protections include survivors of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are available equally to all individuals regardless of sex, gender identity, or sexual orientation. In some instances advocates have used the Fair Housing Act’s prohibition of discrimination based on sex to ensure persons with VAWA protections are not discriminated against in accessing housing. The Texas Department of Public Safety reports that the total number of Texas family violence incidents in 2016 was 196,564. This represented a 0.9% increase compared to 2015. These incidents involved 214,815 victims (up 1.7% from 2015) and 208,764 offenders (up 1.8% from 2015). It must be noted that there is not a one-for-one relationship between incidents and victims of domestic violence. One incident can involve multiple victims, and one victim can experience multiple incidents. However, the numbers reported below do not reflect the severity of the problem. According to data from the National Crime Victimization Survey, in 2017 only 44.9% of violent crimes were reported to police, while only 40.4% of rapes or sexual assaults were reported. Less than half of all instances of domestic violence (47.2%) and serious domestic violence (48.3%) were reported to police.<sup>19</sup> Figure 2-22 shows the number of victims of domestic violence in Texas in 2016.

**Figure 2-22: Victims of Domestic Violence, Texas, 2017**

Area	Total Victims in 2016	Total Population, 2012-2016	% of Victims to Population
Non-Metro	18,014	3,034,567	0.5%
Metro	194,293	23,921,868	0.81%
Texas	212,307	26,956,435	0.79%

Source: Texas Department of Public Safety Public Information Request, 2018 and 2012-2016 American Community Survey.

### Residents of Colonias

Colonias are substandard housing developments concentrated along the Texas-Mexico border. These developments lack basic services such as drinking water and sewage treatments. Several state agencies, including TDHCA, are working to address barriers in colonia communities. According to Texas Government Code §2306.581 “Colonia” means:

*a geographic area located in a county some part of which is within 150 miles of the international border of this state, consists of 11 or more dwellings that are located in close proximity to each other in an area that may be described as a community or neighborhood, has a majority population composed of individuals and families with low income and very low income, based on the federal OMB poverty index and meets the qualifications of an economically distressed area*

<sup>19</sup> Morgan, Rachel and Jennifer Truman. Bureau of Justice Statistics. “Criminal Victimization, 2017”. <<https://www.bjs.gov/content/pub/pdf/cv17.pdf>>



*under Section 17.921, Water Code; or has the physical and economic characteristics of a colonia, as determined by the department.*

Many colonias are located along the border region, usually beyond the limits of incorporated areas where there are fewer local codes and regulations. The classic hallmarks of colonias include limited infrastructure and a high level of substandard housing, including self-built homes, structures not primarily intended for residential use, and homes with extensions and modifications, often added on a self-help basis, which may not be secure or safe. An estimated 500,000 people live in 2,294 colonias in Texas.<sup>20</sup> Based on a 2014 assessment by the Texas Secretary of State’s Colonia Initiatives Program, six Texas counties (El Paso, Maverick, Webb, Starr, Hidalgo, and Cameron) have the largest population of colonias and are home to an estimated 369,500 people. Population numbers in this assessment were validated in several ways: by 2010 census data, by city and county figures, and (in some cases) by colonia ombudspersons conducting site visits. In particular, persons living in Colonias may have protections under the Fair Housing Act related to race, ethnicity, and/or national origin status and may have limited English proficiency.

### Residents of Public Housing

In 2017, there were 54,266 public housing units in Texas, almost 75% of which were in urban areas. Residents of public housing often have low educational attainment, poor mental and physical health, limited access to social networks that facilitate job access, and physical isolation from opportunity.<sup>21</sup> Figure 2-23 and Figure 2-24 show the race and ethnicity of the householder in public housing units. In Texas, residents of public housing are more likely to be Black than the rest of the statewide population. However, this discrepancy is less stark than in the rest of the United States. While Texas public housing residents are twice as likely to be Hispanic as their peers nationwide, this number is well in line with the overall demographics of the state and does not constitute a disparity. Neither TDHCA nor HUD maintain demographic data about persons on public housing waitlists, so no analysis can be performed.

**Figure 2-23: Race of Head of Household in Public Housing, 2017-2018**

	White	Black or African American	American Indian or Alaskan Native	Asian	Native Hawaiian or Other Pacific Islander
<b>United States</b>	54%	42%	1%	2%	1%
<b>Texas</b>	62%	36%	0%	1%	0%

Source: U.S. Department of Housing and Urban Development PIH Information Center Resident Characteristics Report.

Note: Data represents tenants of public housing from May 1, 2017 through August 31, 2018.

<sup>20</sup> Federal Reserve Bank of Dallas. (2015, April). Las Colonias in the 21st Century: Progress Along the Texas-Mexico Border. <<http://dallasfed.org/assets/documents/cd/pubs/lascalonias.pdf>.>

<sup>21</sup> Urban Institute. (2013, January). Improving the lives of public housing’s most vulnerable families. <<http://www.urban.org/sites/default/files/alfresco/publication-pdfs/412763Improving-the-Lives-of-Public-Housing-s-Most-Vulnerable-Families.PDF>.>

**Figure 2-24: Ethnicity of Head of Household in Public Housing, 2017-2018**

	Hispanic or Latino	Non - Hispanic or Latino
<b>United States</b>	19%	81%
<b>Texas</b>	37%	63%

Source: U.S. Department of Housing and Urban Development PIH Information Center Resident Characteristics Report.  
 Note: Data represents tenants of public housing from May 1, 2017 through August 31, 2018.

Figure 2-25 shows some selected characteristics relating to protected classes of households in public housing. Compared to the rest of Texas, the heads of housing in public housing units are more than three times as likely to have a disability, while equally as likely to have a child. Additionally, a full third of all households in public housing units are a single female head of household with a child.

**Figure 2-25: Selected Characteristics of Households in Public Housing, 2017-2018**

	Head of Household with a Disability	Household with a Child	Female Head of Household with a Child
<b>United States</b>	36%	38%	34%
<b>Texas</b>	37%	45%	41%

Source: U.S. Department of Housing and Urban Development PIH Information Center Resident Characteristics Report.  
 Note: Data represents tenants of public housing from May 1, 2017 through August 31, 2018.

### Youth Aging Out of Foster Care

In Texas, youth in the foster care system age out at 18 years of age (although under a variety of programs they may remain in the system to receive ongoing services and assistance until the age of 24). Foster youth that age out of foster care often have multiple factors that can keep them from entering into or maintaining stable housing and are more likely than other youth to become homeless. In Fiscal Year 2016, 1,250 foster youth aged out of foster care in Texas, 84.5% of which lived in Metro counties. A recent study of youth who had been in foster care found that when asked where they went when they aged out, some of the most common responses included 26% went to a family home, 15% to a foster family home, 5% to a relative’s home, 15% to the home of a friend or boyfriend/girlfriend, , 5% to transitional living or their own place, and 8% went to the streets.<sup>22</sup>

Figure 2-26 shows the racial and ethnic composition of youth exiting Texas Department of Family and Protective Services (DFPS) Child Protective Services (CPS) custody. While approximately 19% of children leaving DFPS custody were Black or African American,

<sup>22</sup> Narendorf, S., Santa Maria, D. & Cooper, J. (2015). YouthCount 2.0!: Full report of findings. Houston, TX. <[http://www.uh.edu/socialwork/New\\_research/projects/Youth%20Count%202.0/](http://www.uh.edu/socialwork/New_research/projects/Youth%20Count%202.0/)>

Figure 2-26 shows that 24% of youth emancipated or aged out were African American. This would mean that because African American children are overrepresented in DFPS custody in Texas, they are also more likely to be overrepresented in those aging out of the system.

**Figure 2-26: Race and Ethnicity of Youth Exiting DFPS Custody in Texas, 2017**

	White	African American	Hispanic	Other	Asian	Native American
<b>Custody with Relatives with PCA</b>	31.4%	23.6%	37.9%	6.9%	0.1%	0.0%
<b>Custody with Relatives without PCA</b>	32.9%	19.5%	41.1%	6.4%	0.2%	0.0%
<b>Family Reunifications</b>	33.1%	16.9%	42.3%	6.6%	0.9%	0.1%
<b>Non Relative Adoption</b>	36.5%	16.0%	38.1%	8.7%	0.6%	0.2%
<b>Other</b>	24.0%	19.5%	48.4%	7.7%	0.0%	0.5%
<b>Relative Adoption</b>	27.6%	18.9%	47.2%	6.2%	0.1%	0.0%
<b>Youth Emancipation</b>	32.6%	23.9%	38.7%	4.0%	0.4%	0.0%
<b>Total Leaving DFPS Custody</b>	32.5%	18.6%	41.7%	6.6%	0.4%	0.1%

Source: Texas Department of Family Protective Services, CPS Conservatorship: Children Exiting DFPS Legal Custody.

### Veterans and Wounded Warriors

According to the 2011-2015 American Community Survey, in 2015, there were 1,539,655 Veterans in Texas, which is 7.9% of the Texas population over the age of 18. During the 2017 Point-in-Time count, 9.3% of the adult population experiencing homelessness identified as Veterans. On a single night in 2017, there were 40,056 Veterans experiencing homelessness in the United States, and nearly all (98%) were homeless in households without children (as individuals). Between 2016 and 2017, homelessness among Veterans increased by 1.5% nationwide. Texas had the third largest percentage increase in homeless Veterans from 2016 to 2017 at 24%.<sup>23</sup>

Figure 2-27 highlights the clear demographic differences between veterans and non-veterans. Texas veterans are significantly more likely to be male, White, Non-Hispanic, and have a disability.

<sup>23</sup> U.S. Department of Housing and Urban Development. (2017, December). The 2017 Annual Homeless Assessment Report (AHAR) to Congress. <<https://www.hudexchange.info/resources/documents/2017-AHAR-Part-1.pdf>>

**Figure 2-27: Demographics of Texas Veterans, 2012-2016**

	<b>Total</b>	<b>% of Total</b>	<b>Veterans</b>	<b>% of Veterans</b>	<b>Non-Veterans</b>	<b>% of Non-Veterans</b>
<b>Population 18 and Over</b>	19,731,218		1,513,294		18,217,924	
<b>Male</b>	9,660,820	49.0%	1,364,615	90.2%	8,296,205	45.5%
<b>Female</b>	10,070,398	51.0%	148,679	9.8%	9,921,719	54.5%
<b>White Alone</b>	14,940,554	75.7%	1,223,023	80.8%	13,717,531	75.3%
<b>Black or African American Alone</b>	2,342,833	11.9%	201,817	13.3%	2,141,016	11.8%
<b>Asian Alone</b>	896,890	4.5%	14,171	0.9%	882,719	4.8%
<b>American Indian or Alaskan Native</b>	94,241	0.5%	8,746	0.6%	85,495	0.5%
<b>Native Hawaiian or Other Pacific Islander</b>	15,621	0.1%	2,329	0.2%	13,292	0.1%
<b>Some other Race</b>	1,085,721	5.5%	34,011	2.2%	105,710	0.6%
<b>Two or More Races</b>	355,358	1.8%	29,197	1.9%	326,161	1.8%
<b>Hispanic or Latino</b>	6,894,250	34.9%	267,761	17.7%	6,626,489	36.4%
<b>White, non-Hispanic</b>	9,334,627	47.3%	1,001,970	66.2%	8,332,657	45.7%
<b>Disabled</b>	2,779,773	14.1%	415,799	27.5%	2,363,974	13.0%

Source: U.S. Census Bureau American Community Survey 5 Year Estimates, 2012-2016, Table S2101.

## Chapter 3 - Review of State- Level Laws, Regulations, and Programs

This chapter summarizes Texas state-level laws, regulations, and programs, and analyzes if they have the effect of making housing unavailable for groups of persons protected by the Fair Housing Act Amendments of 1988 (the FHAA as later amended since that date), if any. The FHAA create obligations that all levels of government not “make unavailable” housing to serve certain protected classes of U.S. persons.

This review focuses specifically and only at the state level - not the local level. Texas confers a great deal of land use and planning authority on its cities and counties. This review focuses on how the state government directly influences the availability of housing through its own programs, and indirectly influences that availability through state level requirements or restrictions on the land use and housing powers of its local government. The fact that a city or county could decide to use state-granted authority that is facially-neutral in ways that would violate the FHAA is not considered as a state-created barrier to fair housing.

The FHAA prohibits housing discrimination based on race, color, religion, sex, national origin, familial status, and disability. We refer to those groups as “FHAA-protected persons.” Income is not a protected class and low-income persons are not protected under the FHAA. However, there may be instances of overlap between the FHAA-protected classes and lower income populations; in such cases, this chapter mentions potential impacts on affordability.

This review covered the following Texas Statutes: The Government Code, the Health and Safety Code, the Local Government Code, the Property Code, and chapters 1201 and 1202 of the Occupations Code. In addition, Title 10 of the Texas Administrative Code (TAC), which contains the Texas rules that govern the Department, and portions of Title 40 of TAC (Social Services and Assistances) referenced by the above listed Codes were reviewed. The chapter is divided into the following topics:

- Building (including accessibility, siting)
- Statewide planning of Public Transportation
- Social Services
- State Laws - Texas Fair Housing Act
- State Banking and Insurance Laws
- Taxation

### Building

Regulation on construction, if extensive, can have the potential to increase housing costs, and thereby make production of affordable housing even more challenging, in turn reducing the supply of affordable housing. In addition, if regulations contain provisions that discourage or prohibit the types of modifications that may be needed to meet the needs of FHAA-protected persons they could create barriers to fair housing choice.

## State Policy – Occupancy Codes

Regulations on the number of occupants permitted in residential dwelling units exist to preserve health and safety and prevent overcrowding in dwelling units. However, it is possible that some municipalities might use this tool to restrict the number of unrelated persons living together in one dwelling unit, which, in turn, could limit group home and other affordable housing options. Texas Property Code §92.010 requires that landlords limit occupancy to three times the number of bedrooms in a dwelling; it also provides an option to increase that limit as required by state or federal fair housing law.

Texas Property Code §92.010. OCCUPANCY LIMITS.

- (a) Except as provided by Subsection (b), the maximum number of adults that a landlord may allow to occupy a dwelling is three times the number of bedrooms in the dwelling.
- (b) A landlord may allow an occupancy rate of more than three adult tenants per bedroom:
  - (1) to the extent that the landlord is required by a state or federal fair housing law to allow a higher occupancy rate; or
  - (2) if an adult whose occupancy causes a violation of Subsection (a) is seeking temporary sanctuary from family violence, as defined by Section 71.004, Family Code, for a period that does not exceed one month.

§92.010 does allow landowners to comply with federal law and does not appear to create a barrier to fair housing choice under the FHAA. Note that occupancy codes — like manufactured home safety codes and building codes — are considered a public health and safety protection in which the government’s desire to ensure that all housing is safe and sanitary implicitly outweighs its impact on making some sizes or types or qualities of housing unavailable for the general public.

## State Policies - Different Types of Homes

### Manufactured Homes

State-level laws governing manufactured homes are addressed in Texas Occupations Code (while those related to the creation of Manufactured Home Rental Communities are addressed in the Local Government Code discussed below). The Texas Occupations Code Chapter 1201 defines manufactured and mobile homes and those definitions are binding on all political subdivisions. Like many other states, cities, and counties, “mobile home” means a pre-HUD-standard (i.e. pre-1976) manufactured home, and “manufactured home” means a post-1976 manufactured home that meets HUD safety standards.

Texas Occupations Code §1201.252 grants authority to local governmental units to adopt different standards for construction and installation of manufactured homes if the new standards are established for public health and safety reasons. Texas Occupations Code §1201.008 grants municipalities the authority to prohibit mobile homes (as opposed to manufactured homes) from being used as a residential dwelling. Finally, 10 TAC Chapter 80, which provides the rules of the

Department of Manufactured Housing, contains technical standards and other process requirements that must be adhered to by those who provide manufactured housing in the state, such as installation, licensing, enforcement, etc.

Texas Occupations Code §1201.008, as noted above, prohibits mobile homes; this is a standard provision found in many state and local regulations. While restricting pre-HUD-standard manufactured housing units may remove those units from possible affordable housing options for lower-income persons, their restriction does not pose an impact on a class of FHAA-protected persons any more or less than any other lower-income persons. More importantly, the public health and safety benefits of requiring manufactured housing to be of a recent enough age that it meets federal safety standards is generally considered a benefit that outweighs the potential value of making these aged units available to the public.

### **Industrialized Housing**

Texas Department of Licensing and Regulation (TDLR) regulates industrialized housing and performs inspections of such construction. Texas Occupations Code Chapter 1202 defines industrialized housing, which generally includes pre-assembled or modular housing, and includes standards for construction (building, mechanical, plumbing, etc.) codes, grants authority for municipalities to regulate land use, zoning, setbacks, and other areas.

Texas Occupations Code, §1202 Section 1202.253 states that:

- (a) Single-family or duplex industrialized housing must have all local permits and licenses that are applicable to other single-family or duplex dwellings.
- (b) For purposes of this section, single-family or duplex industrialized housing is real property.
- (c) A municipality may adopt regulations that require single-family or duplex industrialized housing to:
  - (1) have a value equal to or greater than the median taxable value for each single-family dwelling located within 500 feet of the lot on which the industrialized housing is proposed to be located, as determined by the most recent certified tax appraisal roll for each county in which the properties are located;

Section 1202.253 states that:

- (a) Single-family or duplex industrialized housing must have all local permits and licenses that are applicable to other single-family or duplex dwellings.

Provisions such as §1202.253(a), clearly authorize Texas municipalities (but not counties) to take actions consistent with the exercise of general zoning authority, and to adopt regulations that would limit the availability of modular housing and/or raise the price of those units. As with the manufactured housing statutes reviewed above, the resulting potential impact on reducing affordable housing options for lower-income households would be the same on FHAA-protected

persons and other persons. They do not create barriers to fair housing choice specific to those groups protected under the FHAA.

In addition, 28 TAC §5.4011 requires that to be eligible for catastrophe property insurance, structures located in the designated catastrophe areas must be built to the 2006 International Residential Code. Requiring that proposed affordable housing developments have defined levels of insurance coverage, and that new housing structures be built to defined building code standards in order to be eligible for catastrophic damage insurance, may raise the cost and possibly reduce the supply of affordable housing. However, insurance requirements are intended to provide for the public's health and safety based on risks of different types of housing, and impact of those requirements on housing supply is considered secondary. The regulations do not address FHAA-protected groups, and any impacts on affordable housing supply or price will have the same impacts on FHAA-protected groups and non-protected groups.

### **State Laws on Local Regulations of Buildings**

The Texas Legislature has passed laws relating to the state's governance over local policies. Those regulations are found in the Texas Local Government Code (as detailed in the Local Regulations section, below) and relate to issues that include housing, building regulations, zoning or community development. These are state statutes that govern local regulation of zoning, platting, community development, regulation of buildings, etc. Such regulations, depending on how they are implemented and applied locally, could have an impact on the availability and affordability of housing.

Some building occupancy restrictions in zoning ordinances have an exception to allow any number of related individuals to occupy a dwelling unit. In contrast, many building codes or standards simply establish a standard for overcrowding — a number of people per room, or per square foot — that cannot be exceeded regardless of whether the occupants are related or not. Building occupancy regulations that are too stringent can serve as a barrier to housing choice for lower income households and for large families. A second way in which governments may restrict occupancy is through landlord-tenant laws. (Texas Property Code §92.010).

It is important to acknowledge that occupancy codes may have a disproportionate impact on FHAA-protected households in two situations. First, some group homes or boarding houses for persons with disabilities may have more residents than an average family so an occupancy limit anywhere below the average occupancy of a group home or boarding house may have a disproportionate impact on group home occupants. Second, if households (family or not) of a particular protected racial group are likely to be larger than average, an occupancy limit anywhere below the average household size for that racial group may have a disproportionate impact on that group.

### **Local Regulations**

The following text summarizes the various sections in Texas Local Government Code that affect building structures.



Texas Local Government Code Chapter 214, relates to municipal regulation of housing and other structures. The chapter covers municipal regulations of dangerous structures, manufactured homes, plumbing and sewers, swimming pool enclosures, building lines, building and rehabilitations codes, registration of vacant buildings, energy conservation, rent control, building permits (only for emergency management), prohibition of requirements regarding sale of housing units and lots to establish a maximum price. Local Government Code §214.219 specifies minimum habitability standards for multifamily rental buildings for large cities like Houston, though subsection (f) requires a municipality to try to relocate tenants when ordering the closure of a multifamily building due to a violation of the minimum habitability ordinance. Such standards establish the municipal authority to ensure that residential buildings meet a certain safety and building standard, though such regulations may, thereby, indirectly limit the availability of low income housing.

Several statutes relate to actions that may or may not be taken by a local government to promote affordable housing. Local Government Code §214.902 speaks to the issue of rent controls and allows municipalities to establish rent control only in the event of a disaster and with approval of the governor. Rent control is not available as a general tool to be used by Texas cities or counties. As it relates to homeownership, Texas Local Government Code §214.905 also states that a municipality cannot adopt a maximum sale price (except in limited circumstances), but can create and implement incentives or other programs to incentivize moderate- or lower-cost housing. However, those incentives cannot include linkage fees. Texas Local Government Code §250.008, relating to linkage fees, states that a political subdivision may not adopt or enforce a charter provision, ordinance, order, or other regulation that imposes, directly or indirectly, a fee on new construction (other than affordable housing) for the purposes of offsetting the cost or rent of any unit of residential housing.

The regulations in Chapter 214 may limit the tools available to local government in Texas that are used in other areas of the country to increase the supply of housing for low-income groups (commonly called “inclusionary zoning.”). However, their impacts on FHAA-protected groups should be equal to persons of low-income without such protections. These statutes do not directly create a barrier to fair housing choice.<sup>24</sup>

Local Government Code §§214.212 and 214.215 require cities (but not counties) throughout the state to use the International Residential Code (May 1, 2001) or rehabilitation codes as the residential building code throughout the state, but provides an ability to adopt local amendments or a different code as long as the resulting code includes provision for building rehabilitation or a separate rehabilitation code.

The adoption of an internationally recognized building code protects public health and safety; it may also possibly result in increases in housing costs, however those may be offset by the

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<sup>24</sup> Though not a barrier to fair housing choice, it is noted that in the Texas Senate Committee on Intergovernmental Relations hearing held on May 31, 2018, the Urban Institute report on housing was cited, and noted that one of the challenges to affordability is that Texas does not allow inclusionary zoning for local governments to promote or require the development of affordable housing.

efficiencies of using a predictable set of building standards across the state. The requirement for a building rehabilitation code or code provisions is a best practice that tends to maintain a habitable existing housing stock and extend that stocks useful life. In addition, some building codes include a provision for variances or alternative compliance that can be used to respond to requests for “reasonable modification” under the FHAA. For these reasons, building construction codes are seldom targeted as significant impediments to fair housing choice. Neither sections of this statute create barriers to fair housing choice for FHAA-protected persons.

Texas Local Government Code Chapter 244, Subchapter B, relates to Municipal regulation of Shelter for Homeless Individuals. Texas Local Government Code §§244.021 through .023 addresses issues such as spacing and location requirements for homeless shelters, but only applies to cities with a population greater than 1.6 million, which currently applies to Houston, the one large city in Texas that has chosen not to exercise its option to adopt zoning controls. This statute requires a city that has chosen not to adopt zoning to impose zoning-like controls over homeless shelters (which could limit the availability of that housing where it is needed). However, the regulation then provides that the city may “consent” to exceptions to the spacing requirements (which could minimize the impact of the restriction). Nevertheless, since homeless individuals are not an FHAA-protected group, this does not constitute a violation of the FHAA, although in any given area or locale other factors may result in the homeless population having a high level of overlap with one or more protected classes.

Texas Local Government Code Chapter 233 relates to county regulation of housing and other structures. The chapter covers county regulations of dangerous structures, building and setback lines, residential building code standards for unincorporated areas of counties, and other regulations. Such standards establish the county authority to ensure that residential buildings meet a certain safety and building standard. In many cases these regulations are more limited than those within incorporated areas. This may result in the ability to create more affordable housing, however the lower protections and codes may be detrimental to those purchasing those units, such as may occur in colonias.

Texas Local Government Code §233.153 authorizes (but does not require) counties that are within 50 miles of the international border or that have a population of more than 100 to require that single family homes and duplexes comply with the International Residential Code. Counties may also adopt the international building code as adopted by their county seat. This was created to give the authority to small communities and border communities to adopt a residential code, to offset the possible negative conditions created in colonias. Note that the statutory language does not require that those constructing a house or duplex to notify the county of construction of housing, so as a practical matter it may be difficult for counties to implement and enforce even if they have adopted the International Residential Code. Since no Texas county is obligated to adopt these standards, this regulation does not create barriers to protected classes.

## **Other Homes**

The following statutes also govern various types of non-standard housing or other residential facilities:

- Texas Health and Safety Code Chapter 247 stipulates standards, including accessibility standards, and municipal reinforcement, for assisted living facilities. Assisted living facilities fall under the authority of the Texas Health and Human Services Commission, and Chapter 247 of the Texas Health and Safety Code requires assisted living facilities to be licensed by that department. TDLR also governs the interpretation and enforcement of accessibility standards in assisted living. (Health and Safety Code, §247.0264)

Chapter 247 does not authorize any specific land use treatment of group homes — i.e., it does not limit Texas cities in their zoning authority to permit, or exclude, group homes in residential areas, and it does not give Texas counties zoning-like powers to exclude them. The regulation simply requires that group homes have a state-issued license. While some groups likely to occupy assisted living facilities, such as persons with disabilities, are FHAA-protected persons, it is quite common for states and/or local governments to establish licensing systems for group home operators in order to protect the health and safety of residents with limited abilities to protect themselves. State and local licensing systems are not intended to restrict the number of assisted living facilities except for reasons of public health and safety, and the facility licensing systems in place by the state are not considered to create barriers to fair housing choice for these groups.

- Texas Health and Safety Code Chapter 260, relates to requirements for boarding home facilities. Texas Health and Safety Code Chapter 260 defines “boarding home facility” and enables a county or municipality to require a person to obtain a permit to operate a boarding home facility (§260.004); clarifies model standards; and states that facilities meeting the standards may not be excluded from a residential area by zoning ordinance or similar regulations. Like assisted living facilities, boarding houses are regulated by the Texas Health and Human Services Commission (HHSC). While a local government that decides to establish a permit system may not exclude boarding homes that meet its standards from residential areas (§260.011), there is no stated limit to the strictness or laxity of the boarding home standards that would need to be met for this to apply. Chapter 260 enables — but does not require — cities to establish a system that could remove some barriers to boarding homes for some FHAA-protected persons in residential areas.

In contrast, Texas counties do not have general zoning powers. Counties would presumably not be able to exclude boarding homes from residential areas in the absence of some legislatively granted power to do so.

Note, however, that Chapter 260 does not apply to the full range of FHAA-protected persons; it applies to persons with disabilities, but the definition of boarding house would not cover facilities based on family status or recovering alcohol and drug addicts. Texas counties would not have the power to exclude boarding homes for groups other than persons with disabilities from residential areas, and Chapter 260 does not give them that power.

- Texas Health and Safety Code, Chapter 591.003. Group homes are regulated by the HHSC. The definition of a Group Home is found in Texas Health and Safety Code Chapter §591.003(10). This statute does not authorize any specific land use treatment of group homes — i.e. it does not limit Texas city zoning authority to permit or exclude group homes in residential areas, and it does not give Texas counties zoning-like powers to

exclude them. It simply requires that they have a state-issued license. While persons with cognitive disabilities are FHAA-protected persons, it is quite common for states and/or local governments to establish licensing systems for group home operators in order to protect the health and safety of residents with such disabilities.

Related codes:

- Texas Health and Safety Code Chapter 555 stipulates requirements for state supported living centers for people with intellectual and developmental disabilities.
- Texas Human Resource Code Chapter 105 stipulates disclosure requirements for residential facilities for persons with disabilities or who are elderly.
- Texas Human Resource Code 123.003 stipulates requirements for Community Homes for persons with disabilities, which prohibits zoning and restriction discrimination against community homes.
- Texas Health and Safety Code 388 stipulates requirements for building energy performance standards.

### **Restrictive Covenants**

Texas Property Code Chapter 201 (Restrictive Covenants Applicable to Certain Subdivisions) authorizes restrictive covenants in unincorporated subdivisions but prohibits racial covenants. These are fairly standard provisions applicable in many states, and the prohibition on racial covenants confirms the removal of barriers to fair choice in housing based on race already embedded in federal law.

Restrictive covenants that prohibit the construction or use of houses as assisted living and group housing facilities for groups of up to six or eight persons (which have occupancy characteristics similar to single family homes) can be a barrier to fair housing choice.

### **Programs - Specific Building Requirements**

State agencies that administer programs may have additional requirements for their programs. For instance, the Department is authorized by Tex. Gov't Code §2304.005 to adopt minimum housing, building, fire, and related code standards applicable to areas where a housing rehabilitation plan has been approved by the Department and for which local government standards are not in effect. Tex. Gov't Code §2306.514 delineates construction requirements for single family affordable housing. These standards, and others provided in Department rules for single and multifamily housing, are in furtherance of its statutory mission to assist in the providing of safe, decent, and affordable housing to all low-income Texans. They do not create barriers to fair housing choice.

### **Accessibility**

The FHAA offers protection to persons with disabilities to ensure they have equal access to safe and affordable housing options. However, that right may be impaired if the available housing is not accessible to disabled persons (e.g. doors are too narrow to accommodate wheelchairs, or building entries are located above or below grade level with no means for a wheelchair to

accommodate that change in grade). See the “Housing Programs for Persons with Disabilities” section, below, for more details.

Texas Government Code Chapter 469, Elimination of Architectural Barriers, requires that each building and facility subject to the chapter be accessible to and functional for persons with disabilities without causing the loss of function, space, or facilities. Specifically, the chapter ensures accessible design for people with disabilities in buildings funded with public money, emergency or temporary structures, buildings leased or rented by the state, a “public accommodation”, and “commercial facilities.” This statute appears to be consistent with the requirements of the Americans with Disabilities Act. The Texas Accessibility Standards have also been adopted by TDLR as required by Tex. Gov’t Code §469.052.

In addition, TDLR provides registration requirements for accessibility specialists and education requirements for coursework that includes the Fair Housing Act, Americans with Disabilities Act (ADA), Texas accessibility standards, and other topics related to the profession.

16 TAC Chapter 68 further provides clarifications on buildings and facilities subject to compliance with the Texas accessibility standards, reviews and inspections of buildings, responsibilities of registered accessibility specialists, and other regulations affecting elimination of Architectural Barriers.

In addition, the Texas Board of Architectural Examiners (TBAE) administers a licensing program to ensure that only qualified professionals become licensed in Texas. Under Texas Occupation Code, Chapter 1051, practices of architecture and engineering include implementing programming, regulatory, and accessibility requirements for a building, that would affect the living environment for persons with disabilities.

Other laws also exist to protect the safety and environment of persons with disabilities. For instance, there are reasonable accommodation requirements for fire alarms for hearing impaired persons (Texas Property Code §92.254, Subsection (a-1)). In addition, a purchaser under a written contract for the sale of a one-family or two-family dwelling may require the seller to install smoke detectors for hearing-impaired persons under certain conditions (Health and Safety Code §766.0021).

For the FHAA, Texas Property Code Chapter 301 codifies selected provisions of the FHAA, including the reasonable accommodations clause — provisions that would apply even without the statute — and reiterates existing federal requirements that remove potential barriers to fair housing choice for persons with disabilities (See Texas Fair Housing Act section further in this chapter).

## **Housing Programs Offered by the State**

TDHCA provides a variety of housing programs, including multifamily and single family housing. The agency has published accessibility and reasonable accommodations rules in 10 TAC Chapter 1, Subchapter B, on reasonable accommodations, the Fair Housing Act, construction standards, and requirements for multifamily housing and resources. Note the applicability of construction standards with Sec. 504 of the Rehabilitation Act of 1973:

10 Texas Administrative Code §1.206, Applicability of the Construction Standards for Compliance with §504 of the Rehabilitation Act of 1973

(a) The following types of Multifamily Housing Developments must comply with the construction standards of §504 of the Rehabilitation Act of 1973, as further defined through the Uniform Federal Accessibility Standards (UFAS):

(1) New construction and reconstruction HOME and NSP Multifamily Housing Developments that began construction before March 12, 2012;

(2) Rehabilitation HOME and NSP Multifamily Housing Developments that submitted a full application for funding before January 1, 2014; and

(3) All Housing Tax Credit and Tax Exempt Bond Developments that were awarded after September 1, 2001, and submitted a full application before January 1, 2014.

(b) The following types of Multifamily Housing Developments must comply with the construction requirements of 2010 ADA standards with the exceptions listed in "Nondiscrimination on the Basis of Disability in Federally Assisted Programs and Activities" Federal Register 79 FR 29671 and not otherwise modified in this subchapter:

(1) New construction and reconstruction HOME and NSP Multifamily Housing Developments that began construction after March 12, 2012; and

(2) All Multifamily Housing Developments that submit a full application for funding after January 1, 2014.

(c) After March 12, 2012, Recipients of ESG and HHSP funds must comply with the 2010 ADA Standards with the exceptions listed in "Nondiscrimination on the Basis of Disability in Federally Assisted Programs and Activities" Federal Register 79 FR 29671 and not otherwise modified in this subchapter.

(d) Effect on LURAs. These rules do not serve to amend contractual undertakings memorialized in a recorded LURA but may, by operation of law, place requirements on a property owner beyond those contained in the LURA.

For construction of single family housing funded by the Department, the following applies:

Texas Government Code, §236.514

CONSTRUCTION REQUIREMENTS FOR SINGLE FAMILY AFFORDABLE HOUSING. (a) If a person is awarded state or federal funds by the department to construct single family affordable housing for individuals and families of low and very low income, the affordable housing identified on the person's funding application must be constructed so that:

(1) at least one entrance door, whether located at the front, side, or back of the building:

(A) is on an accessible route served by a ramp or no-step entrance; and

(B) has at least a standard 36-inch door;

(2) on the first floor of the building:

(A) each interior door is at least a standard 32-inch door, unless the door provides access only to a closet of less than 15 square feet in area;

(B) each hallway has a width of at least 36 inches and is level, with ramped or beveled changes at each door threshold;

(C) each bathroom wall is reinforced for potential installation of grab bars;

(D) each electrical panel, light switch, or thermostat is not higher than 48 inches above the floor; and

(E) each electrical plug or other receptacle is at least 15 inches above the floor; and

(3) if the applicable building code or codes do not prescribe another location for the breaker boxes, each breaker box is located not higher than 48 inches above the floor inside the building on the first floor.

(b) A person who builds single family affordable housing to which this section applies may obtain a waiver from the department of the requirement described by Subsection (a)(1)(A) if the cost of grading the terrain to meet the requirement is prohibitively expensive.

In addition, reasonable accommodations requirements for single family housing activities are provided in 10 TAC §20.9.

## Integrated Housing

The state addresses integrated housing in several areas. For the Health and Human Services Commission's Voucher Program for Transitional Living Assistance for Persons with Disabilities, Tex. Gov't Code §531.059 provides for integrated housing as follows:

(a)(2) "**Integrated housing**" means housing in which a person with a disability resides or may reside that is found in the community but that is not exclusively occupied by persons with disabilities and their care providers.

Integrated housing allows persons with disabilities to live in the community with full and equal access to a variety of housing opportunities. TDHCA also has an Integrated Housing Rule which applies to all multifamily developments funded through the Department. The standard provided for in that rule follows:

**10 TAC §1.15(d), Integrated Housing Standard**

Integrated Housing Standard. Units exclusively set aside or containing a preference for Households with Disabilities must be dispersed throughout a Development.

(1) A Development may not market or restrict occupancy solely to Households with Disabilities unless required by a federal funding source.

(2) Developments with 50 or more Units shall not exclusively set aside more than 25 percent of the total Units in the Development for Households with Disabilities.

(3) Developments with fewer than 50 Units shall not exclusively set aside more than 36 percent of the Units in the Development for Households with Disabilities.

In addition, the rule for mental health community-related services, 25 TAC §416.9(c)(3), also mentions integrated housing as part of the considerations when providing services:

Housing related services develop an individual's strengths and abilities to manage the symptoms of the individual's serious mental illness that interfere with the individual's capacity to obtain or maintain tenure in independent integrated housing. Such services consist of:

(A) skills training related to:

(i) home maintenance and cleanliness;

(ii) problem-solving with the individual's landlord and neighbors, mortgage lender, or homeowners association; and

(iii) maintaining appropriate interpersonal boundaries; and

(B) supportive contacts with the individual to reduce or manage the behaviors or symptoms related to the individual's serious mental illness that interfere with maintaining independent integrated housing.

## **Visitability**

TDHCA has incorporated visitability requirements into its multifamily rules to ensure expanded choice for tenants.



10 TAC §11.101(b)(8) states:

(8) Development Accessibility Requirements. All Developments must meet all specifications and accessibility requirements as identified in subparagraphs (A) - (C) of this paragraph and any other applicable state or federal rules and requirements. The accessibility requirements are further identified in the Certification of Development Owner as provided in the Application.

(A) The Development shall comply with the accessibility requirements under Federal law and as further defined in Chapter 1, Subchapter B of this title (relating to Accessibility Requirements). (§§2306.6722; 2306.6730)

(B) Regardless of building type, all Units accessed by the ground floor or by elevator ("affected units") must comply with the visitability requirements in clauses (i)-(iii) of this subparagraph. Design specifications for each item must comply with the standards of the Fair Housing Act Design Manual. Buildings occupied for residential use on or before March 13, 1991 are exempt from this requirement. If the townhome Units of a Rehabilitation Development do not have a bathroom on the ground floor, the Applicant will not be required to add a bathroom to meet the requirements of 10TAC §11.101(b)(8)(B)(iii).

(i) All common use facilities must be in compliance with the Fair Housing Design Act Manual;

(ii) To the extent required by the Fair Housing Design Act Manual, there must be an accessible or exempt route from common use facilities to the affected units;

(iii) Each affected unit must include the features in subclauses (I) - (V) of this clause.

(I) at least one zero-step, accessible entrance;

(II) at least one bathroom or half-bath with toilet and sink on the entry level. The layout of this bathroom or half-bath must comply with one of the specifications set forth in the Fair Housing Act Design Manual;

(III) the bathroom or half-bath must have the appropriate blocking relative to the toilet for the later installation of a grab bar, if ever requested by the tenant of that Unit;

(IV) there must be an accessible route from the entrance to the bathroom or half-bath, and the entrance and bathroom must provide usable width; and

(V) light switches, electrical outlets, and thermostats on the entry level must be at accessible heights.

(C) The Development Owner is and will remain in compliance with state and federal laws, including but not limited to, fair housing laws, including Chapter 301, Property Code, Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), the Fair Housing Amendments Act of 1988 (42 U.S.C. §§3601 et seq.); the Civil Rights Act of 1964 (42 U.S.C. §§2000a et seq.); the Americans with Disabilities Act of 1990 (42 U.S.C. §§12101 et seq.); the Rehabilitation Act of 1973 (29 U.S.C. §§701 et seq.); Fair Housing Accessibility; the Texas Fair Housing Act; and that the Development is designed consistent with the Fair Housing Act Design Manual produced by HUD, and the Texas Accessibility Standards. (§2306.257; §2306.6705(7))

(D) All Applications proposing Rehabilitation (including Reconstruction) will be treated as substantial alteration, in accordance with Chapter 1, Subchapter B of this title (relating to Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act).

## **Housing Programs for Persons with Disabilities**

Multiple housing programs are available to assist persons with disabilities at the state level. TDHCA currently offers Section 8 Housing Choice Vouchers, Section 811 PRA, HOME and Amy Young Barrier Removal Program (AYBR) for persons with disabilities.

The Section 811 PRA program provides project-based rental assistance for extremely low-income persons with disabilities linked with long term services. The program is made possible through a partnership between TDHCA, the Texas Health and Human Services Commission (HHSC) and eligible multifamily properties.

The Project Access program utilizes Section 8 Housing Choice Vouchers administered by TDHCA to assist low-income persons with disabilities in transitioning from institutions into the community by providing access to affordable housing.

Programs are also available for persons with disabilities for home accessibility modifications. For HOME, additional funds are set-aside for units of general local governments, public housing authorities, local mental health authorities, and nonprofit entities that assist households that include a person with a disability. The funds set-aside for persons with disabilities can be used for the TBRA, HBA, and HRA activities and may be utilized throughout the state, including within participating jurisdictions.

The Amy Young Barrier Removal Program (AYBR) provides one-time grants of up to \$20,000 for Persons with Disabilities who need modifications to increase accessibility and eliminate hazardous conditions in their home. Program beneficiaries must include a Person with Disability, must have a household income that does not exceed 80% of the Area Median Family Income. This program is available to both homeowners and renters.

Other state agencies offer housing-related assistance promoting fair housing choice for persons with disabilities:

- General Land Office administers the CDBG-DR program. The program allows for the modification of program eligible homes to increase accessibility levels for the homeowner or a family member. A home must qualify for assistance under a CDBG-DR program (such as, single family rehabilitation or single family reconstruction) and modifications are an eligible cost. For example, many of the homes in Galveston that flooded during Hurricane Ike and received assistance through CDBG-DR programs required significant elevation of the entire structure. Many of these homes were equipped with either accessibility ramps and/or chair lifts to accommodate any homeowners with accessibility needs. These types of needs are met for those who require them once they are deemed eligible under other programs.
- Texas Dept. of Agriculture administers Texas CDBG, with housing rehabilitation that offers housing modifications for persons with disabilities being an eligible activity under the Community Development Fund and Colonia Fund - Construction program.
- Texas Veterans Land Board (VLB) provides low interest land loans, and home/home improvement loan to Texas veterans, including accessibility modifications.

- Texas Veterans Commission (TVC) operates the Housing for Texas Heroes grants, which allow organizations to assist Texas Veterans and their families in obtaining, maintaining, or improving housing. Projects include homeless Veterans support, Veteran homelessness prevention, home modification assistance, and housing assistance for families of Veterans being treated at Texas medical facilities.

## Siting

State laws on siting and property taxes, have an impact on the location of housing and the affordability of housing. While many regulations reside at the local level, the state does have laws on municipal zoning, platting and other laws that govern such local regulations:

Texas Local Government Code Chapter 211	Municipal Zoning
<p>The State of Texas—like every other state in the United States—grants municipalities zoning authority to divide land into districts and regulate things like building height, lot coverage, setbacks, and density.<sup>25</sup> State-level zoning enabling acts may create barriers to fair housing choice if they require local government to adopt standards, definitions of land uses, or procedures that restrict housing options for FHAA-protected persons, but the mere fact that the acts allow local governments to take those actions does not constitute a state-level barrier to fair housing.</p> <p>Each of these laws giving cities certain authority includes fairly typical provisions in line with those found in many states. While the ability to regulate population density raises the possibility that individual cities could restrict density in ways that raise the costs of housing (which is common), the Texas law does not create or encourage that result. These statutes do not require local governments to take any actions that would restrict access to housing for FHAA-protected persons, and do not create state-level barriers to fair housing for those groups.</p>	
Texas Local Government Code 212	Municipal Subdivision and property development
<p>The State of Texas authorizes municipalities to adopt rules governing subdivisions and plat and covers the authority of municipalities to enforce land use restrictions, building permits in <b>extraterritorial jurisdiction</b>, etc. Texas statutes describe platting requirements in general and for specific areas. Platting regulations can increase the cost of housing by requiring large lots, extensive infrastructure improvements, and other regulations, but those impacts do not directly implicate FHAA-protected persons. Local Government Code §212.002 includes authorization for municipalities to adopt rules governing subdivisions and plats, including the platting requirements. §212.002 does not create barriers to fair housing.</p>	

In short, all of the special cases in which Texas counties are given zoning powers or zoning-like powers are similar to the municipal zoning enabling powers and do not create barriers to fair housing choice to FHAA-protected persons. The State of Texas does not grant zoning authority to counties, with a few exceptions. However, counties do have selected land use powers that can

<sup>25</sup> Levine, Jonathan, *Zoned Out*, (Washington, RFF Press), 2006.

affect development. Finally, Local Government Code Chapter 231 grants zoning authority in specific listed areas of counties in specific areas of the state, including parts of South Padre Island; Amistad Recreation Area; areas around many listed lakes (and large lakes in general); the El Paso Mission Trail Historical Area; areas around U.S. military bases; and, in one case, to an entire county (Hood County). Local Gov't Code Chapter 231 is where Texas extends zoning powers to specific unincorporated areas — often to protect natural resources, tourism potential, or public safety — because, without specific enabling authority, the county involved would not have powers to regulate development and prevent adverse impacts. Twelve different subchapters for specific areas and types of areas have been added to Chapter 231 over time. In almost all cases, the county powers granted are identical, and include the power to regulate the height, number of stories, and size of buildings; percentages of a lot that may be occupied; the size of yards, courts, and other open spaces; population density; location and use of buildings; and building construction standards. In some cases they extend to placement of water and sewage facilities, parks and other public facilities.

There are different statutes that govern county subdivision powers. Texas Local Government Code Subchapter A (§232.001) grants Texas counties subdivision platting powers and lists related requirements.

Local Government Code §232.007 (part of Subchapter A) states that a manufactured home rental community is not a subdivision, grants counties the power to adopt minimum infrastructure standards for a manufactured home community, and includes what aspects of the development the county may regulate. Note that this statute does not address regulation of individual manufactured homes on individual lots in the community — only the creation of a manufactured home park, which involves land layout and servicing issues similar to that addressed by subdivision controls. This regulation does not present barriers to housing for FHAA-protected groups of persons.

In the 85<sup>th</sup> Regular Legislative Session, HB 2359 was passed which amended Civil Practice and Remedies Code, Chapter 125. The bill authorizes a court (including a county court) to order the appointment of a receiver to manage a property if it is determined by the court that a person is not maintaining a vacant lot or vacant or abandoned building to abate the nuisance.

Local Government Code Chapter 232 Subchapter E (§232.101) includes a separate statement of plat regulation powers for “urban counties.” Although the subchapter title references infrastructure planning, the substance of the text is not limited to that topic, but addresses general subdivision plat regulation power. In addition, the title references urban counties, but the text does not define which Texas counties are being enabled to use these powers, rather than those in Subchapter A of Chapter 232, as their authority to regulate subdivisions.

Such laws giving counties certain authority are fairly typical and in line with laws found in many other states, with one exception. The provisions of Local Government Code Chapter 232 Subchapter B addressing subdivision powers near international borders include significantly more detailed provisions that may “raise the bar” higher than the state applies to non-border counties. Instead of simply authorizing county governments to adopt platting regulations, Subchapter B requires certain counties to adopt certain regulations that could result in water and sewer service requirements higher than those imposed by other counties (although, not

necessarily higher than is expected in municipalities) and prohibits county commissioner's courts from approving plats that do not meet those standards. As such, these regulations, while protecting residents and consumers, could, in theory, have the effect of raising land subdivision prices — and therefore housing prices — for those persons living in the area, however, no conclusive evidence is presented that suggests this has occurred.

These statutes do not require local governments to take any actions that would restrict access to housing for FHAA-protected persons, and do not create state-level barriers to fair housing for those groups.

Generally, zoning and subdivision regulations do not prevent the sale of already-created nonconforming parcels, but may prevent homes from being built on these lots until they are made conforming (for example, by buying an adjacent parcel and combining them) or until a variance is obtained.

Texas Local Government Code Chapter 253 authorizes municipalities to sell land to a nonprofit organization that develops housing for low-income individuals and may also determine qualification standards for low-income housing based on median individual and family income. By allowing this activity, §253.010 potentially increases the supply of housing that can be made available for lower-income groups, which may reduce barriers to housing choice by improving affordability.

Homestead Preservation Districts and Reinvestment Zones, under Texas Local Government Code Ch 373A, (1) promote the ability of municipalities to increase home ownership, provide affordable housing, and prevent the involuntary loss of homesteads by existing low-income and moderate-income homeowners living in disadvantaged neighborhoods; (2) protect a municipality's interest in improving economic and social conditions within disadvantaged communities by enhancing the viability of home ownership among low-income and moderate-income residents in areas experiencing economic pressures; and (3) provide municipalities with a means to expand and protect the homestead interests of low-income and moderate-income families.

A community land trust created or designated under Section 373B.002 must be a nonprofit organization that is: (1) created to acquire and hold land for the benefit of developing and preserving long-term affordable housing in the municipality or county; and (2) exempt from federal income taxation under Section 501(a), Internal Revenue Code of 1986, by being certified as an exempt organization under Section 501(c)(3) of that code. These trusts (1) provide affordable housing for low-income and moderate-income residents in the community; (2) promote resident ownership of housing; (3) keep housing affordable for future residents; and (4) capture the value of public investment for long-term community benefit.

Texas Local Government Code Ch. 379C-E provides that a governing body of a municipality may adopt an urban land bank demonstration program in which the officer charged with selling real property ordered sold pursuant to foreclosure of a tax lien may sell certain eligible real property by private sale for affordable housing development or other purposes as provided by this chapter.

Local Government Code §374.014 requires urban renewal plans that may be adopted by municipalities to have a feasible method for relocation. Under the federal Uniform Relocation Act, assistance must be made available without regard to the status or characteristics of the individual receiving assistance, so this requirement should not affect free housing choice for FHAA-protected groups any differently than for others. Likewise, Texas Property Code §21.046 requires any department, agency, instrumentality, or political subdivision of the state that is using eminent domain powers to remove existing structures to provide relocation assistance that is compatible with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

The elements in §373.005 for community development programs do not contain any language either requiring the programs to address, or prohibiting them from addressing, housing availability for FHAA-protected groups. The statute is facially neutral towards those groups, though it does allow various programs to assist or rehabilitate federally-funded projects for low-income households. The statute is generally intended to improve housing quality, and does not create barriers to fair housing choice.

Texas Local Government Code Chapter 379E permits municipalities to adopt an urban land bank program to promote affordable housing development. Urban land bank programs are a tool to manage the price of housing and increase the supply of affordable housing. The impacts on housing for FHAA-protected persons should be the same as on housing for the general public.

Texas Local Government Code Chapters 392 and 393 authorize the establishment of local housing authorities and establish authority for cooperation among local governments to work on local affordable housing projects. Such laws are meant to support affordable housing, and combat a shortage of safe or sanitary housing available to persons of low income.

Texas Local Government Code Chapter 394 authorizes the establishment of housing finance corporations whose purposes must include affordable housing.

In addition, a housing finance corporation may issue bonds to finance a multifamily residential development to be owned by the housing finance corporation if at least 50 percent of the units in the multifamily residential development are reserved for occupancy by individuals and families earning less than 80 percent of the area median family income.

Texas Local Government Code Chapter 395 gives authority for political subdivisions to reduce or waive impact fees for affordable housing.

Texas Local Government Code 395.016(g).

Notwithstanding Subsections (a)-(e) and Section 395.017, the political subdivision may reduce or waive an impact fee for any service unit that would qualify as affordable housing under 42 U.S.C. Section 12745, as amended, once the service unit is constructed. If affordable housing as defined by 42 U.S.C. Section 12745, as amended, is not constructed, the political subdivision may reverse its decision to waive or reduce the impact fee, and the political subdivision may assess an impact fee at any time during the development approval or building process or after the building process if an impact fee was not already assessed.

This provision supports the development of affordable housing for low-income households. The effect on housing for FHAA-protected groups should be the same as on housing for lower-income households that are not part of an FHAA-protected class.

Texas Property Code Chapter 203 (Enforcement of Land Use Restrictions in Certain Counties) authorizes the county attorney, in counties larger than 200,000 people, to enforce restrictions contained in properly recorded real property records including uses, setbacks, lot size, type and number of buildings or other structures that may be built on the property. This statute does not grant authority to adopt restrictions. Nevertheless, this statute does not require local governments to take any actions that would restrict access to housing for FHAA protected persons, and does not create state-level barriers to fair housing for those groups. Furthermore §203.003(b) would prevent the enforcement of restrictions enacted in violation of the Equal Protection Clause in the 14th Amendment to the U.S. constitution.

State standards that authorize local governments to remove blight and slums through the use of eminent domain, or restrict them from taking those actions, or that authorize them to sell or demolish multifamily housing or substandard housing can affect low-income housing options. The main concern with such provisions is the potential to dislocate disproportionate numbers of FHAA-protected persons without compensation or assistance with relocation. See Chapter 2206, Tex. Gov't Code, Chapter 373 or 374, Local Government Code, and Section 311.005(a)(1)(I), Tax Code.

### **State Housing Assistance and Siting**

TDHCA provides housing tax credits and loan assistance for the development of multifamily developments through a variety of funding sources, and provides criteria by which those proposed developments may be approved. Neither TDHCA nor any other agency of Texas state government authorizes, or directs the criteria for housing developments that do not involve the use of state or federal funds. Approval of individual projects that do not receive state or federal monies is performed by the city or county governments within which those projects are located — subject only to the zoning, subdivision, and development regulations established by those local governments.

**TDHCA Programs.** TDHCA currently administers a federal tax credit program that includes competitively awarded 9 percent credits and noncompetitive 4 percent credits (which are credits associated with private activity bond issuances). Competitive credits are awarded based on a point system that covers such factors as financial feasibility, quantifiable community participation, tenant income levels, size and quality of units, rent levels of units, cost of development per square foot, tenant services, declared disaster areas, development location, tenant populations with special housing needs, length of affordability period, and others. The Non-Competitive (4%) Housing Tax Credit program is coupled with the Multifamily Bond Program when the bonds finance at least 50% of the cost of the land and buildings in the Development.

The Department publishes rules on site and development requirements and restrictions. Such regulations include requirements and limitations with regard to development in floodplains; siting near undesirable site features such as within a certain distance of junkyards, solid waste facilities, etc; and siting in a location with neighborhood risk factors such as high crime areas or

being in a school attendance zone of a school that has not met standard. The rules also stipulate a point structure for developments that provide mandatory unit amenities such as energy-star appliances or lighting fixtures, storage space, or covered patios, etc; common amenities such as accessible walking/jogging paths or playscapes; and tenant support services.

TDHCA publishes the Qualified Allocation Plan (QAP) each year, which provides the rules that govern multifamily products developed with Department resources, to incentivize tax credit developments in certain areas or with certain features. The point award system varies from year to year based on policy priorities and extensive public input. In the past, point features have included proximity to the urban core, dispersion criteria, and concerted community revitalization.

Additionally, TDHCA administers a Colonia Self-Help Center Program, with centers located in El Paso, Val Verde, Maverick, Webb, Starr, Hidalgo, Cameron/Willacy counties to assist low-income and very low-income individuals and families. Colonia Self-Help Centers work to finance, refinance, construct, improve, or maintain a safe, suitable home in the Colonias' designated service area.

**Programs in Other State Agencies.** Texas Department of Agriculture does not require agency approval for project sites. Building construction must conform to federal CDBG regulations, state building standards, and local building codes. Federal CDBG regulations require that any housing unit demolished be replaced on a one-for-one basis. Likewise, displacement of residents is covered by the Uniform Relocation Act (URA) requirements and incorporated into program rules, but no recent grants have triggered this requirement.

At the General Land Office site approvals go through a federally mandated environmental review and Affirmatively Furthering Fair Housing review. Building requirements (water efficiency, green building standards, etc.) are laid out in both federal law and the federal register when published for any given allocations. Demolition is determined on a case-by-case basis with cost reasonableness being the primary deciding factor. If residents and/or businesses are displaced or relocated as a result of the CDBG-DR programs then URA rules apply and those residents and/or businesses receive relocation assistance. This decision is directly related to the type of work needed to be done on the structure and the potential disruption it could have on the current inhabitants.

## **Statewide Planning of Public Transportation**

Transportation intersects in a significant way with affordable housing. When households rely significantly on public transportation, this can have an impact on where the household may choose to live. The Texas Transportation Commission and Texas Department of Transportation (TxDOT) use the Unified Transportation Program (UTP) as TxDOT's 10-year plan to guide transportation project development across Texas. The UTP is developed annually in accordance with 43 TAC §16.105, and is approved by the Texas Transportation Commission annually. The UTP is an intermediate programming document linking the planning activities of the Statewide Long-Range Transportation Plan (SLRTP), the Metropolitan Transportation Plans, and Rural



Transportation Plan to the detailed programming activities under the Statewide Transportation Improvement Program (STIP) and TxDOT's 24-month (2-year) Letting Schedule.<sup>26</sup>

The public Transportation portion of the 2018 Unified Transportation Plan lays out the planning process involving public transportation statewide. In FY 2015, the Public Transportation Division managed grant projects that supported more than 30 million passenger trips in Texas, across 128 agencies. These grants include projects like capital investments in bus replacement, job access programs in rural areas, and programs to assist the transportation needs of people with disabilities. Additionally, there are more than 135 operators in Texas providing transportation services to the elderly and to individuals with disabilities.

TxDOT itself does not own capital equipment or facilities for use in transit service, nor does it provide actual services to transit passengers. TxDOT does not develop capital projects funded through transit grant funds, but instead manages grant projects that support operating and capital projects implemented by rural and urban transit districts and other eligible entities. The transit program provides the funding authority for public transportation projects through the distribution of federal apportioned dollars and state funds. The Texas Transportation Commission has established funding allocation methodologies for the various programs, and development of these methodologies has been guided by the department's goals. Biennially, the Texas Legislature appropriates state funds, which are also disbursed on a reimbursement basis. For FY 2018-19, this amount is expected to be \$67.7 million. Public transportation providers may use their state funds to meet the match requirements of federal grants or for any other public transportation purpose that is allowable under federal or state law. These funds are awarded to rural and urban transit districts, and other eligible entities, by formula. In addition, federal funding is available through Section 5303 and 5304 planning programs, Section 5307 urbanized formula program, Section 5310 Seniors and Individuals with Disabilities Program, Section 5311 non-urbanized program, the 15% set aside for intercity bus, rural transit assistance program, Section 5339 bus and bus facilities program, etc.

In addition, Local Government Code Chapter 615, Subchapter C, details transportation laws including grants, transportation expenses for senior citizens, and other items. In particular, the "commissioners court of a county with a population of 2.2 million or more may pay out of the county general funds costs and expenses for the transportation of senior citizens and their caregivers for civic, community, educational, and recreational activities within and outside the county if a majority of the costs and expenses paid are for the transportation of senior citizens." (Local Govt. Code 615.022)

Because of the importance of transportation to low income households in maximizing their choices for affordable housing, the Department incentivizes developments applying for Housing Tax Credits to locate near public transportation, or to provide on-demand transportation.

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<sup>26</sup> Source: <https://www.txdot.gov/inside-txdot/division/transportation-planning/utp.html>

## Social Services

The state offers a wide variety of programs that help persons with disabilities. In particular, the Texas Health and Human Services Commission offers a variety of services to Texans with disabilities that help ensure their well-being, dignity, and choice. Programs also are in place to support family members who care for them. Some are targeted at persons with specific disabilities, while others are for independent living or services for persons with disabilities in general. Housing related services from these areas can include tenancy supports, housing navigators, relocation services, etc. In addition, 2-1-1 Texas, a program of Texas Health and Human Services, is committed to helping Texas citizens connect with the services they need. The scope of those programs and their associated criteria can be found at <https://hhs.texas.gov/>.

Many state agencies other than HHSC, offer state programs with housing-related services as part of social services provisions that assist with providing affordable housing, as further described below. Such programs help relieve the burden of persons with disabilities and other persons in need of affordable housing.

TDHCA is the state agency responsible for affordable housing, poverty prevention, energy assistance programs, colonia activities, and regulation of the state's manufactured housing industry. The Department currently administers \$2 billion in resources which it provides to for-profit, nonprofit, and local government partnerships to deliver local housing and community-based opportunities and assistance to Texans in need. Housing Programs at TDHCA were described in brief earlier, and will be addressed in future chapters as well. As it relates to services, additional activities provided by the Department include:

- Colonia Self-Help Centers
- Utility Assistance
- Weatherization
- Poverty Assistance
- Homelessness prevention
- Amy Young Barrier Removal Program
- Section 811 Project Rental Assistance (PRA)

The Texas Department of Agriculture administers its CDBG programs in accordance with funding rules and regulations set by HUD. The primary objective of the Community Development Block Grant program is to develop viable communities by providing decent housing and suitable living environments, and expanding economic opportunities principally for persons of low- to moderate-income. The Department of Agriculture administers the Community Development Block Grant Colonia Set-Aside Program by allocating no less than 10 percent of the yearly allocation of CDBG funds for eligible activities to assist in providing for the housing, planning, and infrastructure needs in Colonias.

The Texas General Land Office oversees long-term disaster recovery through Community Development Infrastructure and Housing projects, including rebuilding and repairing homes and rebuilding infrastructure and community development and revitalization. The Community Development Block Grants for Disaster Recovery (DR) program allows the GLO to work with local

leadership on long-term housing that not only helps to rebuild a community, but lessen the cost and impact of future disasters. The use of best practices and innovative construction in the rehabilitation and reconstruction of impacted housing strengthens the community and ensures community resiliency. More extensive discussion of the GLOs activities are provided in Chapter 9.

Within their DR resources the GLO administers the Multifamily Affordable Rental Housing Program. This program currently provides a total of \$250 million for the rehabilitation, reconstruction, and new construction of affordable multifamily housing projects in areas impacted by Hurricane Harvey. The maximum award for any applicant/development is \$25 million. The program includes resiliency and mitigation efforts. GLO flooding mitigation efforts include: home elevation, and first floors designed to serve as parking or storage areas with no living spaces to minimize flooding impact.

The Texas Veterans Land Board is administratively attached to GLO. The Texas Veterans Land Board also provides low interest land loans, and home/home improvement loans to Texas veterans, and includes resources for accessibility modifications. The VLB Texas State Veterans Homes provide affordable, long-term nursing care for Texas Veterans, their spouses and Gold Star parents. In addition, all amounts necessary from the Veterans' Land Administration Fund No. 522 and the Veterans' Home Administration Fund No. 374 are appropriated to administer the Veterans' Land Program, Veterans' Housing Assistance Program, State Veterans' Homes, and Veterans' Cemeteries, including the amounts incurred in issuing bonds.

The Texas Veterans Commission. The Fund for Veterans' Assistance (FVA) was established in 2005 by the 79th Legislature and funded in late 2009. The FVA program oversees five grant categories: General Assistance, Housing4TexasHeroes, Veterans Mental Health, Veterans Treatment Courts, and Highly Rural Transportation Grants. These grants offer funding to non-profit and local government organizations which, in turn, provide direct services to Texas Veterans and their families. Since 2009, the Texas Veterans Commission (TVC) has awarded over \$88 million in 488 grants to non-profit and local government entities. As of December 2017, grantees have served over 244,000 Texas Veterans and dependents. Housing for Texas Heroes Grants (H4TXH) awards grants to eligible organizations that assist Texas Veterans and their families in obtaining, maintaining, or improving housing. Currently, these grants address homeless/housing needs as well as home modification assistance needs of disabled veterans, low income, and very low income veterans. Projects include homeless veterans support, veteran homelessness prevention, home modification assistance, and housing assistance for families of veterans being treated at Texas medical facilities. These grants are funded through \$1.5 million appropriated by the 85th Legislature for the biennium and other FVA revenue sources. Since 2011, the FVA program awarded over \$15 million in H4TXH grants to help over 3,300 Texas Veterans and dependents.

Funds were appropriated to HHSC to provide rental assistance and supportive housing through the Local Mental Health Authorities (LMHAs) for individuals who are homeless or at significant risk of becoming homeless. For instance, Projects for Assistance in Transition from Homelessness (PATH) program is authorized under §521 (290cc-21) of the Public Health Service Act. Funds are distributed on a formula basis by the federal Center for Mental Health Services to the States and Territories. Texas Health and Safety Code §142 stipulates requirements for home and community

support services that allow people in need of such services to receive them in their own residence.

Texas Utilities Code §14.005, gives the Public Utility Commission permissive authority to “establish criteria and guidelines with the utility industry relating to industry procedures used in terminating services to the elderly and disabled.”

### **Statewide Delivery of HUD CPD Programs Providing Social Services**

There are numerous social services for families with children and persons with disabilities available through different state agencies or entities. The ones that include HUD CPD funding are listed below.

The State of Texas administers its CDBG programs in accordance to funding rules and regulations set by HUD. The primary objective of the Community Development Block Grant program is to develop viable communities by providing decent housing and suitable living environments, and expanding economic opportunities principally for persons of low- to moderate-income.

The Emergency Solutions Grants program, is a competitive grant that awards funds to provide the services necessary to help persons that are at-risk of homelessness or homeless quickly regain stability in permanent housing. The ESG program provides funding to:

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate these shelters;
- Provide essential services to shelter residents;
- Rapidly re-house homeless individuals and families; and
- Prevent families and individuals from becoming homeless.

The Texas Department of State Health Services, Housing Opportunities for Persons with AIDS Program provides housing assistance and supportive services to help low-income persons living with HIV and their households establish or maintain affordable and stable housing, reduce their risk of homelessness, and improve their access to health care and supportive services. Eligible HOPWA program activities include: tenant-based rental assistance, short-term rent, mortgage, and utility assistance, facility-Based Housing Assistance, permanent housing placement, and supportive services.

While not CPD funded, the Department operates the Section 811 Project Rental Assistance program, which provides project-based rental assistance for extremely low-income persons with disabilities linked with long term services. The program is made possible through a partnership between TDHCA, Texas Health and Human Services, and participating multifamily properties.

The Section 811 PRA program creates the opportunity for persons with disabilities to live as independently as possible through the coordination of voluntary services and providing a choice of subsidized, integrated rental housing options.

In addition, the following councils help coordinate social services on homelessness services and housing and health services:

The Texas Interagency Council for the Homeless (TICH) coordinates the state's resources and services to address homelessness. TICH is statutorily established with representatives from eleven state agencies along with members appointed by the governor, lieutenant governor, and speaker of the House of Representatives.

The Housing and Health Services Coordination Council, codified in Texas Government Code §2306.1091, works to increase state efforts to offer service-enriched housing through increased coordination of housing and health services. The Council seeks to improve interagency understanding and increase the number of staff in state housing and health services agencies that are conversant in both housing and services.

The Department of Health and Human Services established the Behavioral Health Advisory Committee (BHAC) as the state mental health planning council in accordance with the state's obligations under 42 U.S.C. §300x-3. The purpose of the committee is to provide customer/consumer and stakeholder input to the Health and Human Services system in the form of recommendations regarding the allocation and adequacy of behavioral health services and programs within the State of Texas.

## **State Laws – Texas Fair Housing Act**

Texas Property Code Chapter 301 includes the state's fair housing law. The Texas Fair Housing Act and the U.S. Fair Housing Act protect Texans from discriminatory housing practices in the sale, rental and financing of dwellings based on race, color, national origin, religion, sex, physical or mental disability, or familial status (presence of a child under age 18 living with parents or legal custodians, person securing custody of children under 18, or a pregnant woman).

Texas Property Code

§301.021. SALE OR RENTAL.

(a) A person may not refuse to sell or rent, after the making of a bona fide offer, refuse to negotiate for the sale or rental of, or in any other manner make unavailable or deny a dwelling to another because of race, color, religion, sex, familial status, or national origin.

(b) A person may not discriminate against another in the terms, conditions, or privileges of sale or rental of a dwelling or in providing services or facilities in connection with a sale or rental of a dwelling because of race, color, religion, sex, familial status, or national origin.

(c) This section does not prohibit discrimination against a person because the person has been convicted under federal law or the law of any state of the illegal manufacture or distribution of a controlled substance.

Sec. 301.022. PUBLICATION. A person may not make, print, or publish or effect the making, printing, or publishing of a notice, statement, or advertisement that is about the sale or rental of a dwelling and that indicates any preference, limitation, or discrimination or the intention to make a preference, limitation, or discrimination because of race, color, religion, sex, disability, familial status, or national origin.

Sec. 301.023. INSPECTION. A person may not represent to another because of race, color, religion, sex, disability, familial status, or national origin that a dwelling is not available for inspection for sale or rental when the dwelling is available for inspection.

Sec. 301.024. ENTRY INTO NEIGHBORHOOD. A person may not, for profit, induce or attempt to induce another to sell or rent a dwelling by representations regarding the entry or prospective entry into a neighborhood of a person of a particular race, color, religion, sex, disability, familial status, or national origin.

Sec. 301.025. DISABILITY. (a) A person may not discriminate in the sale or rental of, or make unavailable or deny, a dwelling to any buyer or renter because of a disability of:

- (1) the buyer or renter;
- (2) a person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or
- (3) any person associated with the buyer or renter.

(b) A person may not discriminate against another in the terms, conditions, or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with the dwelling because of a disability of:

- (1) the other person;
- (2) a person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or
- (3) any person associated with the other person.

(c) In this section, discrimination includes:

- (1) a refusal to permit, at the expense of the person having a disability, a reasonable modification of existing premises occupied or to be occupied by the person if the modification may be necessary to afford the person full enjoyment of the premises;
- (2) a refusal to make a reasonable accommodation in rules, policies, practices, or services if the accommodation may be necessary to afford the person equal opportunity to use and enjoy a dwelling; or
- (3) the failure to design and construct a covered multifamily dwelling in a manner:

- (A) that allows the public use and common use portions of the dwellings to be readily accessible to and usable by persons having a disability;
- (B) that allows all doors designed to allow passage into and within all premises within the dwellings to be sufficiently wide to allow passage by a person who has a disability and who is in a wheelchair; and
- (C) that provides all premises within the dwellings contain the following features of adaptive design:
  - (i) an accessible route into and through the dwelling;
  - (ii) light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;
  - (iii) reinforcements in bathroom walls to allow later installation of grab bars; and
  - (iv) kitchens and bathrooms that are usable and have sufficient space in which an individual in a wheelchair can maneuver.
- (d) Compliance with the appropriate requirements of the American National Standard for buildings and facilities providing accessibility and usability for persons having physical disabilities, commonly cited as "ANSI A 117.1," satisfies the requirements of Subsection (c)(3)(C).
- (e) Subsection (c)(3) does not apply to a building the first occupancy of which occurred on or before March 13, 1991.
- (f) This section does not require a dwelling to be made available to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals or whose tenancy would result in substantial physical damage to the property of others.
- (g) In this subsection, the term "covered multifamily dwellings" means:
  - (1) buildings consisting of four or more units if the buildings have one or more elevators; and
  - (2) ground floor units in other buildings consisting of four or more units.

Sec. 301.026. RESIDENTIAL REAL ESTATE RELATED TRANSACTION. (a) A person whose business includes engaging in residential real estate related transactions may not discriminate against another in making a real estate related transaction available or in the terms or conditions of a real estate related transaction because of race, color, religion, sex, disability, familial status, or national origin.

(b) In this section, "residential real estate related transaction" means:

(1) the making or purchasing of loans or the provision of other financial assistance:

(A) to purchase, construct, improve, repair, or maintain a dwelling; or

(B) to secure residential real estate; or

(2) the selling, brokering, or appraising of residential real property.

Sec. 301.027. BROKERAGE SERVICES. A person may not deny another access to, or membership or participation in, a multiple-listing service, real estate brokers' organization, or other service, organization, or facility relating to the business of selling or renting dwellings, or discriminate against a person in the terms or conditions of access, membership, or participation in such an organization, service, or facility because of race, color, religion, sex, disability, familial status, or national origin.

#### SUBCHAPTER C. EXEMPTIONS

Sec. 301.041. SALES AND RENTALS EXEMPTED. (a) Subchapter B does not apply to:

(1) the sale or rental of a single-family house sold or rented by the owner if:

(A) the owner does not:

(i) own more than three single-family houses at any one time; or

(ii) own any interest in, nor is there owned or reserved on the person's behalf, under any express or voluntary agreement, title to or any right to any part of the proceeds from the sale or rental of more than three single-family houses at any one time; and

(B) the house is sold or rented without:

(i) the use of the sales or rental facilities or services of a broker, agent, or salesperson licensed under Chapter 1101, Occupations Code, or of an employee or agent of a licensed broker, agent, or salesperson, or the facilities or services of the owner of a dwelling designed or intended for occupancy by five or more families; or

(ii) the publication, posting, or mailing of a notice, statement, or advertisement prohibited by Section 301.022; or

(2) the sale or rental of the rooms or units in a dwelling containing living quarters occupied by or intended to be occupied by not more than four families living independently of each other, if the owner maintains and occupies one of the living quarters as the owner's residence.

(b) The exemption in Subsection (a)(1) applies only to one sale or rental in a 24-month period if the owner was not the most recent resident of the house at the time of the sale or rental.

Sec. 301.042. RELIGIOUS ORGANIZATION, PRIVATE CLUB, AND APPRAISAL EXEMPTION. (a) This chapter does not prohibit a religious organization, association, or society or a nonprofit institution or organization operated, supervised, or controlled by or in conjunction with a religious organization, association, or society from:

(1) limiting the sale, rental, or occupancy of dwellings that it owns or operates for other than a commercial purpose to persons of the same religion; or



(2) giving preference to persons of the same religion, unless membership in the religion is restricted because of race, color, or national origin.

(b) This chapter does not prohibit a private club that is not open to the public and that, as an incident to its primary purpose, provides lodging that it owns or operates for other than a commercial purpose from limiting the rental or occupancy of the lodging to its members or from giving preference to its members.

(c) This chapter does not prohibit a person engaged in the business of furnishing appraisals of real property from considering in those appraisals factors other than race, color, religion, sex, disability, familial status, or national origin.

Sec. 301.043. HOUSING FOR ELDERLY EXEMPTED. The provisions of this chapter relating to familial status do not apply to housing:

(1) that the commission determines is specifically designed and operated to assist elderly individuals under a federal or state program;

(2) intended for, and solely occupied by, individuals 62 years of age or older; or

(3) intended and operated for occupancy by at least one individual 55 years of age or older for each unit as determined by commission rules.

Sec. 301.044. EFFECT ON OTHER LAW. (a) This chapter does not affect a reasonable local or state restriction on the maximum number of occupants permitted to occupy a dwelling or a restriction relating to health or safety standards.

(b) This chapter does not affect a requirement of nondiscrimination in any other state or federal law.

The Texas Workforce Commission (TWC), Civil Rights Division enforces the Texas Fair Housing Act. Persons that believe they may have been discriminated against while trying to buy, finance or rent a home or apartment in Texas, may submit a discrimination complaint through the TWC Civil Rights Division. Complaints may be submitted within one year from the date of alleged harm.

Texas Property Code §301.025 cited earlier in this section clarifies that failure to allow reasonable modifications to housing units, failure to make reasonable accommodations to housing rules and policies, and failure to provide accessible units when required by the ADA are all prohibited forms of discrimination. These provisions align with various sections of the FHAA and help prevent barriers to fair housing.

To further protect tenant's rights, H.B. 1099 was passed by the Texas 85<sup>th</sup> Regular Legislative Session in 2017 to amend Texas Property Code §92.015, which expanded the protection of a tenant's rights, especially for families, and the ability to summon police or emergency assistance for family violence. In addition, Texas Health and Safety Code §592.016 provides that an "owner, lessee, sublessee, assignee, or managing agent or other person having the right to sell, rent, or lease real property, or an agent or employee of any of these, may not refuse to sell, rent, or lease to any person or group of persons solely because the person is a person with an intellectual disability or a group that includes one or more persons with an intellectual disability."

This statute incorporates an FHAA requirement that removes a potential barrier to housing availability for persons with intellectual disabilities.

Texas Property Code Chapter 92 addresses landlord-tenant rights in general, Chapter 94 covers landlord-tenant relations for lots in a manufactured home development (not rental of the homes themselves), and Chapter 82 governs the creation and operation of condominiums. All of these statutes are neutral with respect to the identity of the renter or the condominium owner or renter; they do not create barriers to fair housing choice.

Texas Local Government Code also authorizes municipalities to adopt fair housing ordinances:

Texas Local Government Code §214.903.

**FAIR HOUSING ORDINANCES.**

(a) The governing body of a municipality may adopt fair housing ordinances that provide fair housing rights, compliance duties, and remedies that are substantially equivalent to those granted under federal law. Enforcement procedures and remedies in fair housing ordinances may vary from state or federal fair housing law.

(b) Fair housing ordinances that were in existence on January 1, 1991, and are more restrictive than federal fair housing law shall remain in effect.

In addition, housing authorities under Texas Local Government Code Chapter 392 are “subject to all landlord obligations and tenant remedies, other than a suit for personal injuries, as set forth in any lease or rental agreement and in Chapters 24, 54, 91, 92, and 301 of the Property Code” (Tex. Local Gov’t Code §392.006).

Texas Local Government Code §250.007 prohibits (with exceptions) a city or county from adopting an ordinance that prevents a landlord from refusing to lease due to the source of income of the lessee being a federal housing assistance program.

**Sec. 250.007. REGULATION OF RENTAL OR LEASING OF HOUSING ACCOMMODATIONS.**

(a) Except as provided by this section, a municipality or county may not adopt or enforce an ordinance or regulation that prohibits an owner, lessee, sublessee, assignee, managing agent, or other person having the right to lease, sublease, or rent a housing accommodation from refusing to lease or rent the housing accommodation to a person because the person's lawful source of income to pay rent includes funding from a federal housing assistance program.

(b) This section does not affect an ordinance or regulation that prohibits the refusal to lease or rent a housing accommodation to a military veteran because of the veteran's lawful source of income to pay rent.

(c) This section does not affect any authority of a municipality or county or decree to create or implement an incentive, contract commitment, density bonus, or other voluntary program designed to encourage the acceptance of a housing voucher directly or indirectly funded by the federal government, including a federal housing choice voucher.

This statutory provision was challenged in Federal District Court in 2017, and the Court dismissed the case, finding any injury that occurred as a result of the statutory prohibition would exist

regardless of the statute, and would continue to have a remedy if it was the result of illegal discrimination.<sup>27</sup>

The Department's governing statute, Tex. Gov't Code Chapter 2306, and the Department's administrative rules found at 10 TAC Chapter 1 also incorporate requirements of federal law providing for protections and reducing barriers to fair housing choice.

Tex. Gov't Code §Sec. 2306.257.

APPLICANT COMPLIANCE WITH STATE AND FEDERAL LAWS PROHIBITING DISCRIMINATION: CERTIFICATION AND MONITORING.

(a) The department may provide assistance through a housing program under this chapter only to an applicant who certifies the applicant's compliance with:

- (1) state and federal fair housing laws, including Chapter 301, Property Code, Title VIII of the Civil Rights Act of 1968 (42 U.S.C. Section 3601 et seq.), and the Fair Housing Amendments Act of 1988 (42 U.S.C. Section 3601 et seq.);
- (2) the Civil Rights Act of 1964 (42 U.S.C. Section 2000a et seq.);
- (3) the Americans with Disabilities Act of 1990 (42 U.S.C. Section 12101 et seq.); and
- (4) the Rehabilitation Act of 1973 (29 U.S.C. Section 701 et seq.).

## State Insurance and Banking Laws

### Insurance

Access to insurance is an important aspect of one's ability to own and maintain a home, or protect the contents of a leased unit. Texas Insurance Code Chapter 544 clarifies general prohibitions against discrimination by an insurer, including title insurance companies. A person may not refuse to insure or provide coverage to an individual, refuse to continue to insure or provide coverage to an individual, limit the amount, extent, or kind of coverage available for an individual, or charge an individual a rate that is different from the rate charged to other individuals for the same coverage because of the individual's:

- (1) race, color, religion, or national origin;
- (2) age, gender, marital status, or geographic location; or
- (3) disability or partial disability.

In addition, under Texas Insurance Code §560.002, a rate is unfairly discriminatory if the rate:

- (A) is not based on sound actuarial principles;
- (B) does not bear a reasonable relationship to the expected loss and expense experience among risks; or
- (C) is based wholly or partly on the race, creed, color, ethnicity, or national origin of the policyholder or an insured.

Texas Insurance Code §§3502.053 and 3502.102 also clarify the prohibitions on discrimination in mortgage guaranty insurance, another important component of being able to buy a home,

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<sup>27</sup> See ICP v. Abbott, 3:17-cv-00440-G (USDC ND-Tex) Dkt # 63, pp.16-18

especially for low-income or first time homebuyers who do not have significant funds for large downpayments. That section provides that in extending or issuing mortgage guaranty insurance, a mortgage guaranty insurer may not discriminate on the basis of the applicant's sex, marital status, race, color, creed, national origin, disability, or age or solely on the basis of the geographic location of the property to be insured unless:

- (1) the discrimination related to geographic location is for a business purpose that is not a mere pretext for unfair discrimination; or
- (2) the refusal, cancellation, or limitation of the insurance is required by law or regulatory mandate.

§3502.102 further provides that:

- (a) A mortgage guaranty insurance rate, rating plan, or charge may not be excessive, inadequate, or unfairly discriminatory and must be reasonable with respect to the benefits provided.
- (b) This chapter does not require the department to:
  - (1) establish standard and absolute rates or a single and uniform rate for each risk or risks; or
  - (2) compel all insurers to adhere to rates previously filed by other insurers.
- (c) The department may accept different rates for different insurers for the same risk or risks on mortgage guaranty insurance. The department may accept different rates for different insurers as filed by any authorized insurer unless the department finds that the filing does not meet the requirements of this chapter.

The Texas Department of Insurance Bill of Rights, which is posted on the agency's website, has listed the protected class and protections offered:

**PROTECTED CLASSES.** An insurance company cannot discriminate against you by refusing to insure you; limiting the amount, extent or kind of coverage available to you; charging you a different rate for the same coverage; or refusing to renew your policy: because of race, color, religion, gender, marital status, disability or partial disability, or national origin; or unless justified by actual or anticipated loss experience, because of age or geographic location.

**AGE OF HOUSE.** An insurance company cannot refuse to insure your property based on the age of your house. However, an insurance company may refuse to sell you insurance coverage based on the condition of your property, including the condition of your plumbing, heating, air conditioning, wiring and roof.

**VALUE OF PROPERTY.** An insurance company cannot refuse to insure your property because the value is too low or because the company has established minimum coverage amounts.

**UNDERWRITING GUIDELINES.** Underwriting guidelines may not be unfairly discriminatory and must be based on sound actuarial principles.

**EQUAL TREATMENT.** Unless based on sound actuarial principles, an insurance company may not treat you differently from other individuals of the same class and essentially the same hazard. If you sustain economic damages as a result of such unfair discrimination, you have the right to sue that insurance company in Travis County District Court.

In addition, Texas Insurance Code Chapter 2004 requires designation of underserved areas for residential property insurance. 28 TAC, §§5.3700 and 3702 have designated specific underserved areas for residential property insurance. Factors for considering an area as underserved takes into account low median household income, low median value of homes, and older median age of homes. Such considerations help mitigate the risk that people living in specific areas may not be served.

Insurance underwriting requirements, determined by the private sector, may create barriers to fair housing choice if they discourage or prohibit property features or management practices necessary to accommodate the needs of FHAA-protected groups.

## **Banking**

Texas banking and mortgage laws are governed by the Texas Finance Code. Specifically, in Texas Finance Code, §156.303, the “Department of Savings and Mortgage Lending may order disciplinary action against a licensed or registered residential mortgage loan company or a licensed residential mortgage loan originator when the commissioner, after notice and opportunity for hearing, has determined that the company discriminated against a prospective borrower on the basis of race, color, religion, sex, national origin, ancestry, familial status, or a disability.”

Other sections in Texas Finance Code cover various sections on prohibition and penalties for discrimination:

**SUBCHAPTER E. PROHIBITIONS AND VIOLATIONS**

Texas Finance Code Sec. 341.401. **DISCRIMINATION PROHIBITED.** (a) An authorized lender or other person involved in a transaction subject to this title may not deny to an individual who has the capacity to contract an extension of credit, including a loan, in the individual's name or restrict or limit the credit extended:

- (1) because of sex, race, color, religion, national origin, marital status, or age;
- (2) because all or part of the individual's income derives from a public assistance program in the form of social security or supplemental security income; or
- (3) because the individual has in good faith exercised a right under the Consumer Credit Protection Act (15 U.S.C. Section 1601 et seq.; 18 U.S.C. Section 891 et seq.).

(b) In interpreting this section, a court or administrative agency shall be guided by the Equal Credit Opportunity Act (15 U.S.C. Section 1691 et seq.) and regulations under and interpretations of that Act by the Federal Reserve Board to the extent that Act and those regulations and interpretations can be made applicable to conduct prohibited by this section.

Sec. 341.402. **PENALTIES FOR PROHIBITED DISCRIMINATION.** (a) A person who violates Section 341.401 is liable to the aggrieved individual for:

- (1) the actual damages caused by the violation;
- (2) punitive damages not to exceed \$10,000 in an action brought by the aggrieved individual; and
- (3) court costs.

(b) The liability of a person under this section is instead of and not in addition to that person's liability under Title VII of the Consumer Credit Protection Act (15 U.S.C. Section 1691 et seq.). If the same act or omission violates Section 341.401 and applicable federal law, the person aggrieved by that conduct may bring a legal action to recover monetary damages either under this section or under that federal law, but not both.

(c) In addition to the other liabilities prescribed by this section, a person holding a license issued under this subtitle who violates Section 341.401 is subject to revocation or suspension of the license or the assessment of civil penalties by the commissioner.

## **Real Estate**

Protections of real estate transactions are specified in Texas Property Code, Chapter 301. In addition, Texas Real Estate Commission, by rule, prescribes the content of the qualifying real estate courses listed in statute for real estate agents and brokers, which requires 150 minutes of education in fair housing laws (Occupations Code 1101 and 22 TAC §535.64). The Commission may also suspend or revoke a license issued under this chapter or take other disciplinary action authorized by this chapter if the license holder, while engaged in real estate brokerage:

- (1) acts negligently or incompetently;
- (2) engages in conduct that is dishonest or in bad faith or that demonstrates untrustworthiness;
- (3) makes a material misrepresentation to a potential buyer concerning a significant defect, including a latent structural defect, known to the license holder that would be a significant factor to a reasonable and prudent buyer in making a decision to purchase real property;
- (4) fails to disclose to a potential buyer a defect described by Subdivision (3) that is known to the license holder;
- (5) makes a false promise that is likely to influence a person to enter into an agreement when the license holder is unable or does not intend to keep the promise;
- (6) pursues a continued and flagrant course of misrepresentation or makes false promises through an agent or sales agent, through advertising, or otherwise;
- (7) fails to make clear to all parties to a real estate transaction the party for whom the license holder is acting;
- (8) receives compensation from more than one party to a real estate transaction without the full knowledge and consent of all parties to the transaction;
- (9) fails within a reasonable time to properly account for or remit money that is received by the license holder and that belongs to another person;
- (10) commingles money that belongs to another person with the license holder's own money;
- (11) pays a commission or a fee to or divides a commission or a fee with a person other than a license holder or a real estate broker or sales agent licensed in another state for compensation for services as a real estate agent;
- (12) fails to specify a definite termination date that is not subject to prior notice in a contract, other than a contract to perform property management services, in which the license holder agrees to perform services for which a license is required under this chapter;
- (13) accepts, receives, or charges an undisclosed commission, rebate, or direct profit on an expenditure made for a principal;
- (14) solicits, sells, or offers for sale real property by means of a lottery;
- (15) solicits, sells, or offers for sale real property by means of a deceptive practice;
- (16) acts in a dual capacity as broker and undisclosed principal in a real estate transaction;
- (17) guarantees or authorizes or permits a person to guarantee that future profits will result from a resale of real property;
- (18) places a sign on real property offering the real property for sale or lease without obtaining the written consent of the owner of the real property or the owner's authorized agent;
- (19) offers to sell or lease real property without the knowledge and consent of the owner of the real property or the owner's authorized agent;
- (20) offers to sell or lease real property on terms other than those authorized by the owner of the real property or the owner's authorized agent;
- (21) induces or attempts to induce a party to a contract of sale or lease to break the contract for the purpose of substituting a new contract;
- (22) negotiates or attempts to negotiate the sale, exchange, or lease of real property with an owner, landlord, buyer, or tenant with knowledge that that person is a party to an

outstanding written contract that grants exclusive agency to another broker in connection with the transaction;

(23) publishes or causes to be published an advertisement that:

- (A) misleads or is likely to deceive the public;
- (B) tends to create a misleading impression;
- (C) implies that a sales agent is responsible for the operation of the broker's real estate brokerage business; or
- (D) fails to include the name of the broker for whom the license holder acts, which name may be the licensed name, assumed name, or trade name of the broker as authorized by a law of this state and registered with the commission;

(24) withholds from or inserts into a statement of account or invoice a statement that the license holder knows makes the statement of account or invoice inaccurate in a material way;

(25) publishes or circulates an unjustified or unwarranted threat of a legal proceeding or other action;

(26) establishes an association by employment or otherwise with a person other than a license holder if the person is expected or required to act as a license holder;

(27) aids, abets, or conspires with another person to circumvent this chapter;

(28) fails or refuses to provide, on request, a copy of a document relating to a real estate transaction to a person who signed the document;

(29) fails to advise a buyer in writing before the closing of a real estate transaction that the buyer should:

- (A) have the abstract covering the real estate that is the subject of the contract examined by an attorney chosen by the buyer; or
- (B) be provided with or obtain a title insurance policy;

(30) fails to deposit, within a reasonable time, money the license holder receives as escrow or trust funds in a real estate transaction:

- (A) in trust with a title company authorized to do business in this state; or
- (B) in a custodial, trust, or escrow account maintained for that purpose in a banking institution authorized to do business in this state;

(31) disburses money deposited in a custodial, trust, or escrow account, as provided in Subdivision (30), before the completion or termination of the real estate transaction;

(32) discriminates against an owner, potential buyer, landlord, or potential tenant on the basis of race, color, religion, sex, disability, familial status, national origin, or ancestry, including directing a prospective buyer or tenant interested in equivalent properties to a different area based on the race, color, religion, sex, disability, familial status, national origin, or ancestry of the potential owner or tenant; or

(33) disregards or violates this chapter.

For the purpose of regulating real estate brokers and agents, disability includes AIDS, HIV-related illnesses, or HIV infection as defined by the Centers for Disease Control of the United States Public Health Service (22 TAC §531.19).



## Taxation

Property taxes are one of the significant operating expenses for affordable rental properties. Nonprofit organizations, if qualified and eligible, may have a tax advantage under certain state laws that allow specific entities to be exempted from some or all property taxation if those entities fulfill certain conditions. In addition, local tax policy can encourage or discourage the development of affordable housing in jurisdictions by setting higher or lower capitalization or “cap rates” to calculate property tax assessments. The cap rate is determined by dividing the property net operating income by its sales cost. Affordable housing developments by design have lower net income flows than similar properties operating at market rates and pay lower taxes.

<p>Tax Code §§11.181, 182, 11.1825, 1826, 1827</p>	<p>Charitable organizations improving property for low-income housing                      Community housing development organizations improving property for low-income and moderate-income housing: property previously exempt                      Organizations Constructing Or Rehabilitating Low-Income Housing: Property Not Previously Exempt                      Monitoring Of Compliance With Low-Income And Moderate-Income Housing Exemptions                      Community Land Trust</p>
<p>Tax policy incentivizes affordable housing by allowing certain entities to be exempt from taxation of improved or unimproved real property if entities fulfill certain conditions.</p> <p>Tax Code §11.181 Charitable organizations improving property for low-income housing is entitled to an exemption from taxation of improved or unimproved real property it owns if “(1) it meets the requirements of a charitable organization provided by Sections 11.18(e) and (f);                      (2) owns the property for the purpose of building or repairing housing on the property primarily with volunteer labor to sell without profit to an individual or family satisfying the organization's low-income and other eligibility requirements; and                      (3) engages exclusively in the building, repair, and sale of housing as described by Subdivision (2), and related activities.”</p> <p>§11.182 allow CHDOs to be exempt from taxation of improved or unimproved real property An organization is entitled to an exemption from taxation of improved or unimproved real property it owns if the organization:                      (1) is organized as a community housing development organization;                      (2) meets the requirements of a charitable organization provided by Sections 11.18(e) and (f);                      (3) owns the property for the purpose of building or repairing housing on the property to sell without profit to a low-income or moderate-income individual or family satisfying the organization's eligibility requirements or to rent without profit to such an individual or family; and</p>	

<p>Tax Code §§11.181, 182, 11.1825, 1826, 1827</p>	<p>Charitable organizations improving property for low-income housing                  Community housing development organizations improving property for low-income and moderate-income housing: property previously exempt                  Organizations Constructing Or Rehabilitating Low-Income Housing: Property Not Previously Exempt                  Monitoring Of Compliance With Low-Income And Moderate-Income Housing Exemptions                  Community Land Trust</p>
<p>(4) engages exclusively in the building, repair, and sale or rental of housing as described by Subdivision (3) and related activities.</p> <p>§11.1825 allows organizations constructing or rehabilitating low-income housing to an exemption from taxation of real property owned by the organization that the organization constructs or rehabilitates and uses to provide housing to individuals or families meeting certain income eligibility requirements.</p> <p>§11.1826 stipulates certain monitoring requirements with such exemptions.</p> <p>§11.1827 allows community land trusts to be exempt from taxation by a taxing unit of land owned by the trust together with the housing units located on the land if they are owned by the trust if:</p> <p>(1) the trust:</p> <p>(A) meets the requirements of a charitable organization provided by Sections 11.18(e) and (f);</p> <p>(B) owns the land for the purpose of leasing the land and selling or leasing the housing units located on the land as provided by Chapter 373B, Local Government Code; and</p> <p>(C) engages exclusively in the sale or lease of housing as described by Paragraph (B) and related activities, except that the trust may also engage in the development of low-income and moderate-income housing; and</p> <p>(2) the exemption is adopted by the governing body of the taxing unit before July 1 in the manner provided by law for official action by the body.</p>	

Tax laws, which give tax breaks and exemptions to certain homeowners, and developers, may impact the affordability of housing:

Tax Code §§11.13, 11.26, 11.261	LIMITATION OF SCHOOL TAX ON HOMESTEADS OF ELDERLY OR DISABLED LIMITATION OF COUNTY, MUNICIPAL, OR JUNIOR COLLEGE DISTRICT TAX ON HOMESTEADS OF DISABLED AND ELDERLY
<p>State tax policy provides for certain limitations of tax that allows the elderly or persons with disabilities to stay in their homes while reducing their tax burden.</p> <p>§11.13. In addition, an adult who is disabled or is 65 or older is entitled to an exemption from taxation by a school district of \$10,000 of the appraised value of his residence homestead.</p> <p>(d) In addition to the exemptions provided by Subsections (b) and (c) of this section, an individual who is disabled or is 65 or older is entitled to an exemption from taxation by a taxing unit of a portion (the amount of which is fixed as provided by Subsection (e) of this section) of the appraised value of his residence homestead if the exemption is adopted either:</p> <p>(1) by the governing body of the taxing unit; or</p> <p>(2) by a favorable vote of a majority of the qualified voters of the taxing unit at an election called by the governing body of a taxing unit, and the governing body shall call the election on the petition of at least 20 percent of the number of qualified voters who voted in the preceding election of the taxing unit.</p> <p>§11.26 and §11.261 sets forth limitation of school tax or county, municipal, or junior college district tax on homestead for the elderly or disabled.</p>	

Tax limits placed on homesteads of the elderly and disabled persons reduce the taxes to be paid and thereby can prevent a low-income household from being displaced due to increasing taxes. This facilitates affordability for those vulnerable populations and allows persons in those groups to be able to afford to stay in their property. This is particularly useful in neighborhoods experiencing significant change and increases in market demand and property value. As values increase those on fixed incomes, most likely seniors and disabled persons, are unable to afford the rising property tax costs. Tax Codes §§11.13, 11.26, and 11.261 make homeownership more affordable for persons with disabilities, a protected class under FHAA.

## Conclusion

Texas state laws and programs provide significant considerations for protected classes and do not reflect discriminatory practices; while some Texas laws do authorize – or do not prohibit – local actions that could lead to local decision-making practices that may affect protected classes, those laws do not themselves treat protected classes differently.

Although there are Texas statutes that help improve the accessibility of housing units for persons with disabilities, many Texans may not understand or are unaware of fair housing laws and rights, as evidenced by the number of fair housing complaints that are based on persons with disabilities as a protected class. In addition, the data in Chapter 6, relating to Assisted Housing Program and Portfolio Analysis, seems to indicate that more accessible housing units may be needed.

## **Chapter 4 - Review of Prior and Current Actions Taken to Affirmatively Further Fair Housing**

### **Previous Impediments to Fair Housing Choice**

Chapter 4 reviews the impediments to fair housing choice identified in the 2013 Phase II Analysis of Impediments to Fair Housing Choice (AI) and the 2011 Phase I AI for disaster impacted counties in Texas and describes the documented actions taken by the Texas Department of Housing and Community Affairs (TDHCA), Texas Department of Agriculture (TDA), Department of State Health Services (DSHS), General Land Office (GLO), and Texas Workforce Commission – Civil Rights Division (TWC-CRD) to address the effects of the identified impediments. Noted below are the listed impediments from those two documents.

The 2013 Phase II AI identified the following six impediments to fair housing choice in Texas:

1. Not in My Backyard Syndrome (NIMBYism) can create barriers to housing choice for protected classes in some communities.
2. There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements.
3. The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.
4. Protected classes may experience disparities in home mortgage loan denials and high cost loans.
5. Lack of accessible housing and visitability standards limits fair housing choice for persons with disabilities.
6. There are barriers to mobility and free housing choice for protected classes.

The 2011 Updated AI – Phase I Hurricane Impacted Communities identified the following sixteen impediments to fair housing choice in Texas:

1. Protected classes may experience disparities in home mortgage lending and high cost loans.
2. There is inadequate information available to the real estate community, governments and the public about fair housing requirements and enforcement procedures.
3. The public is not sufficiently aware of their Fair Housing rights and how to obtain the assistance necessary to protect those rights.
4. Not in my Backyard Syndrome (NIMBY) may be an impediment to fair housing in Texas communities.
5. Certain governmental policies and practices may not meet current HUD policy concerning affirmatively furthering fair housing. Jurisdictions should act to ensure that their policies affirmatively further fair housing, address mal-distribution of resources, and that they do not unnecessarily impact housing choice.
6. Governmental entities at all levels do not appear to have been proactive in the enforcement of both the Fair Housing Act and the obligation to affirmatively further fair

housing. The State and subrecipients should implement a robust and effective structure for identifying and pursuing suspected violations.

7. Many local jurisdictions have zoning codes, land use controls, and administrative practices that may impede free housing choice and fail to affirmatively further fair housing.
8. Inadequate planning for re-housing after an emergency situation creates a situation where persons who are uninsured or under insured, low income, or special needs can be displaced for long periods of time.
9. There are impediments in public and private actions and private attitudes to housing choice for persons with disabilities.
10. There are barriers to mobility and free housing choice for Housing Choice Voucher holders including: inadequate tenant counseling services and mobility assistance, failure of Public Housing Authorities (PHAs) to apply for the FMR pilot demonstration, and government policies, procedures, and regulations that tend to decrease participation by private housing providers and to restrict available housing to “racially or low-income populated neighborhoods” with little access to economic, educational, or other opportunity.
11. Loss of housing stock in Hurricanes Dolly and Ike compounded the shortage of affordable housing in disaster recovery areas. This shortage is particularly acute in safe, low poverty neighborhoods with access to standard public services, job opportunities and good schools.
12. Lack of financial resources for both individuals and housing providers limits Fair Housing choice. Using an effective program under Section 3 of the Housing and Urban Development Act of 1968 may help members of protected classes gain economic opportunities necessary to allow them to exercise fair housing choice.
13. Location and lack of housing accessibility and visitability standards within political jurisdictions limits fair housing choice for persons with disabilities.
14. Many Colonias residents live in developments that have insufficient infrastructure and protections against flooding and are impacted by flooding beyond events like Hurricanes Dolly and Ike.
15. Minority neighborhoods in disaster areas are primarily served by non-regulated insurance companies that do not adhere to underwriting guidelines and may be discriminated against in the provision of insurance. Texas has passed aggressive statutes to prevent insurance “redlining.” National research indicates that protected classes face unwarranted disparities in the cost of insurance, the amount of coverage, and cancellation of policies without notice to the homeowner.
16. Many jurisdictions do not have adequate Analysis of Impediments to Fair Housing or Fair Housing Plans, and do not keep sufficient records of their activities.

The Phase I AI is used by the GLO when serving disaster impacted communities. The Phase II AI is used by TDHCA, TDA, and DSHS, as well as GLO when serving households outside of the original disaster impacted communities identified in 2011.

## **Actions Taken by State Agencies**

This section briefly describes documented actions recently completed or actions currently underway by State HUD CPD recipients to address the corresponding impediments related to their jurisdiction and programs in the applicable AI.

### **Texas Department of Housing and Community Affairs**

TDHA has taken significant action in this area. Included in Appendix Kis a comprehensive report of efforts, referred to as Action Steps, that TDHCA is currently planning, implementing, or has already incorporated into the rules and processes of the housing and/or community affairs programs that TDHCA administers. While the report provides the specific details on actions taken, a brief summary by impediment is provided below. It should be noted that some activities undertaken address more than one impediment and may be repeated.

#### **Impediment 1: Not in My Backyard Syndrome (NIMBYism) can create barriers to housing choice for protected classes in some communities.**

To make efforts toward mitigating this impediment several of the key activities the Department undertook included: redeveloped its website to improve how fair housing complaints are directed, to provide more targeted resources, and to announce events; produced a short video series in conjunction with the Housing and Health Services Coordination Council (HHSCC) to educate the public; contracted with the University of Houston to produce a Multifamily Primer to aid the needs of the public, advocacy groups and local officials in understanding the housing tax credit program; ran an ad on fair housing in several years of publications for the Texas Affiliation of Affordable Housing Providers (TAAHP); spoke at the Texas American Planning Association conference on Zoning Laws and Best Practices for Fair Housing; published an article in the Texas Municipal League's newsletter to provide local elected officials with clear information on affordable housing; conducted a series of Housing and Services Partnership Academies, also in conjunction with the HHSCC to promote service-enriched housing, in which local teams, including local governments, learned more about how to develop affordable housing; and created a series of fair housing webinars which had more than 400 participants.

#### **Impediment 2: There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements.**

Many of the actions taken to combat NIMBYism through education and increased exposure to the issues of fair housing, also address this impediment for which inadequate information exists on fair housing requirements. All of the items noted in Impediment 1 above have achieved the dual goal of improving the availability of information. In addition the Department has also: provided information the beginning of housing tax credit public forums during the tax credit cycle to address common questions; added a point item to single family HOME competitive applicants if they have attended fair housing training or have fair housing duties as part of an employee's job duties to ensure that recipients of funds are cognizant of fair housing issues; reviewed and revised the Department's Language Access Plan to ensure that language barriers do not make Department information inaccessible; established a fair housing listserv group for information

dissemination; attended the Opportunity Forum presented by the University of Texas LBJ School of Public Affairs; spoke at the TAAHP annual housing conference on fair housing; internally presented on fair housing considerations for rule writers so that all Department staff are in alignment on fair housing; created opportunity maps that are distributed to the Department's Section 8 Housing Choice Voucher clients that show schools, median income, poverty rates, etc. so that the clients can make informed choices in selecting units; participated in local discussions on source of income as a protected class; in coordination with the Texas Affiliation of Affordable Housing Providers, hosted a Fair Housing Accessibility First Construction and Compliance training for development owners; hosted a training on 2010 ADA standards; and implemented a requirement that all TDHCA employees attend fair housing training at least biennially.

**Impediment 3: The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.**

As with the impediment above, steps taken under the first two impediments have also served to address improving public awareness of how to protect fair housing rights. In addition to many of the items in those descriptions working toward this impediment, the Department has also undertaken the following: updated the Department's Section 8 Administrative Plan to ensure that there is clear information for the handling of reasonable accommodation requests; created a Language Assistance webpage, including translations in the 25 most spoken languages in Texas by income eligible households, that detail how persons who are not able to speak, read, write or understand English may request translation assistance with documents and events; created a brochure regarding Tenant's Programmatic Rights which are provided to tenants at move-in; created an agency-wide reasonable accommodation rule that applies to any requests of the Department; provided ESG subrecipients with sample language access plans and checklists for how to assist and interact with limited English proficiency clients; attended a webinar on advocacy strategies for protecting fair housing rights of people with criminal records; and provided fair housing training to Medicaid relocation contractors.

**Impediment 4: Protected classes may experience disparities in home mortgage loan denials and high cost loans.**

To make efforts toward mitigating this impediment several of the key activities the Department undertook included: created a glossary of mortgage terms for use by consumers and prospective homebuyers to help them understand terms such as points, amortization and earnest money; provided credit rating information on the Department's homebuyer website on how to obtain a free credit report and how to access consumer credit counseling; ensured that all marketing materials for the Department's homebuyer program is in Spanish and English; required owner-builders accessing the Department's Bootstrap program to attend homeownership classes that help them understand and build credit; allowed the use of CDBG funds through the Colonia Self-Help Centers to provide credit and debt counseling relating to home purchase and financing; developed a free online homebuyer education module "Becoming a Homeowner" which provides an understanding of what to expect including rates; provided outreach through the Department's Loan Servicing Division to current borrowers on homestead and other exemptions and how to lower tax and insurance payments; through utilizing a new Master Servicer for the Department's first time homebuyer programs, increased lending options for households at risk for predatory

and high cost loans; and created a single family affirmative marketing rule to ensure all single family subrecipients are fairly offering their programs to clients.

**Impediment 5: Lack of accessible housing and visitability standards limits fair housing choice for persons with disabilities.**

Several of the steps undertaken within the impediments above have also served to address access to accessible housing. In addition the Department has: since the last AI, pursued (and successfully received) a second round of Section 811 Project Rental Assistance funding to improve housing options for persons with disabilities; increased the number of Project Access vouchers in 2014 up to 140 vouchers made available for persons with disabilities exiting institutions into the community; revised the multifamily rules to require that regardless of building type, all units accessed by the ground floor or by an elevator must comply with visitability standards; operated a Project Access Pilot specifically for clients exiting state psychiatric hospitals; established a HOME Tenant Based Rental Assistance “bridge” program to allow clients waiting on the Project Access waiting list to exit their institution prior to the voucher being available through use of HOME funds; revised the Housing Trust Fund rules to allow Amy Young Barrier Removal program funds to be used to make accessibility modifications to manufactured housing; expanded universal design elements to single family homeowner rehabilitation activities; allowed additional funds for accessibility modifications in the single family HOME rehabilitation, Contract for Deed, and home buyer assistance activity; participated in the Money Follows the Person program through a collaboration with Texas Health and Human Services; and actively consulted with the Department’s Disability Advisory Workgroup to garner ongoing input on how to make efforts that mitigate this impediment.

**Impediment 6: There are barriers to mobility and free housing choice for protected classes.**

One of the key ways to improve housing choice and barriers to mobility is for the Department to take efforts to site the affordable housing that it funds, or provides housing tax credits to, in a variety of different areas and community types, including high opportunity areas or urban areas undergoing significant redevelopment. Sites located in such areas have greater access to good schools, employment, services and other features. The Department consistently over the last five years since the previous AI has taken active steps to ensure that its multifamily rules incentivize siting in areas of high opportunity and disincentive, or require mitigation, if sited in areas that would be considered to be undesirable or involve a concentration of affordable housing. This continued applicability in the multifamily rules is the greatest contribution toward addressing this impediment. In addition, several of the key activities the Department undertook included: designed the 811 PRA Program to promote choice among properties, entered into a Memorandum of Understanding with the Texas Workforce Commission to provide improved training and collaboration in the handling of complaints related to fair housing; revised the tenant selection criteria; disseminated and hosted a webinar on HUD’s guidance relating to rights of people with criminal records; examined fair market rents and small area fair market rents to set higher payment standards in the Section 8 Voucher Program to expand choices to areas that otherwise may not have qualified for the voucher amount available; sought out a waiver from HUD to increase fair market rents and expand tenant choice in the ESG Program; used its Multifamily Direct Loan Program funds to promote supportive housing development and



developments providing deeper subsidy units, allowing for greater choice; and took actions through policy and creation of forms and trainings to comply with the Violence Against Women Act, thereby providing choice and options for individuals protected by that act.

### **Fair Housing Database Report Details**

The report at Appendix K lists TDHCA's Fair Housing Action Steps. The report is organized by Impediment. Each Action Step is also identified as either ongoing, which are actions that have been taken but that also are continuously, or periodically, performed on an ongoing basis, or as completed, which are specific one-time actions that have been finished or will be finished, and include items such as rule changes and specific outreach efforts. Action Steps may be associated with one or more of the six impediments identified in the 2013 AI; the report indicates which impediments were related to which steps. This report includes all Fair Housing Action Steps taken by TDHCA for both HUD and non-HUD funded TDHCA activities.

Included in the report is a summary of each Action Step and the overhead category describing the activity. Categories include Agency Wide, Single Family, and Multifamily. Community Affairs items, which include the Emergency Solutions Grant Program, are included in the Single Family category. Action Steps are tied to specific TDHCA program areas. The "H" noted in the report indicates that the program area includes HUD funded programs. This report tracks all Fair Housing activity, including activities on non-HUD funded programs.

### **Texas Department of Agriculture (TDA) – CDBG Program**

This section reflects TDA's efforts to affirmatively further fair housing and promote fair housing choice, and is categorized by each impediment identified in the 2013 Phase II AI, followed by the steps TDA has taken to address those impediments.

#### **Impediment 1 - Not in My Backyard Syndrome (NIMBYism) can create barriers to housing choice for protected classes in some communities.**

TDA provides Fair Housing information on its website, including the regulatory basis for Affirmatively Furthering Fair Housing, suggestions for AFFH activities, and contact information for filing fair housing complaints. NIMBYism is not a common discussion point for TxCDBG projects. TxCDBG projects fall into several categories:

- Target area projects that specifically benefit the neighborhood where the construction takes place;
- Projects that benefit all residents of the community that take place at existing infrastructure locations like water treatment plants; and
- Other community-wide projects.

The first two types of TxCDBG projects are relatively unlikely to trigger NIMBY concerns. Local government approval is required for all projects, as the local government is the applicant, and at least one public hearing is mandatory before and after each project. In the rare instance that NIMBY concerns are raised, TDA will require the community to address the issue to the agency's satisfaction prior to approving the project.

**Impediment 2 - There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements.**

All TxCDBG subrecipients are required to take action to inform the public and affirmatively affirm fair housing. These requirements are documented in the TxCDBG Implementation Manual, Chapter 10, excerpted in Appendix H.

All TxCDBG administrators (the point of contact for each grant contract) are required to complete training annually, which includes fair housing information including suggested fair housing activities that can be conducted. In addition, TDA began offering a monthly webinar series called CDBG Over Coffee – the 2018 April topic was “Fair Housing.” TDA hosted a booth at the 2017 and 2018 Texas Municipal League (TML) conference, themed “What is in your Fair Housing Toolbox” to inform local leaders of the obligations and opportunities to impact fair housing choice. TDA participated in the State Fair of Texas, hosting a booth in the Food and Fiber / Go Texan Pavilion in 2015 and 2016, and posting signage in the pavilion in 2017. TDA participated in the Rodeo Austin hosting a booth in 2017.

**Impediment 3 - The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.**

TDA hosted a booth at the 2017 and 2018 TML conference, themed “What is in your Fair Housing Toolbox” to inform local leaders of the obligations and opportunities to impact fair housing choice. TDA participated in the State Fair of Texas, hosting a booth in the Food and Fiber / Go Texan Pavilion in 2015 and 2016, and posting signage in the pavilion in 2017. The TDA website and TxCDBG Implementation Manual direct those seeking to file Fair Housing complaints to HUD and/or the Texas Workforce Commission. Stakeholders with questions about fair housing requirements can also contact TDA’s Fair Housing and Civil Rights Specialist on the TxCDBG compliance team.

**Impediment 4 - Protected classes may experience disparities in home mortgage loan denials and high cost loans.**

TDA included an article in their April 2018 E-zine, *Go Texan*, marketing magazine on the mortgage lending process. TDA does not frequently fund homeownership activities. Housing rehabilitation activities, although rarely included in TxCDBG applications, usually prioritize owner-occupied housing for elderly and/or disabled persons. Housing rehabilitation activities are more likely to be requested under the Colonia Fund. While TDA does allow for rehabilitation of non-profit owned units, this activity has yet to be requested in an application. For more information, see Appendix H.

**Impediment 5 - Lack of accessible housing and visitability standards limits fair housing choice for persons with disabilities.**

TDA encourages housing rehabilitation projects, which typically prioritize homeowners with disabilities, in the Community Development Fund, a TxCDBG program, and Colonia Fund. These programs attempt to increase accessible and visitable housing in rural Texas.

**Impediment 6 - There are barriers to mobility and free housing choice for protected classes.**

All TxCDBG subrecipients are required to take action to inform the public and affirmatively affirm fair housing. The most common actions include supporting city ordinances and county resolutions addressing fair housing choice.

TxCDBG Planning and Capacity Building grant recipients include fair housing elements in several planning components, including housing inventory analysis, capital improvement needs planning, analysis of zoning ordinances, and overall planning strategies.

Some TxCDBG projects address fair housing choice by providing first time utility services to improve living conditions in existing communities. These projects benefitted 1,864 individuals in 2016 and 2,100 individuals in 2017.

**Texas Department of State Health Services (DSHS) – HOPWA Program**

This section reflects DSHS’s efforts to affirmatively further fair housing and increase fair housing choice and is categorized by each impediment identified in the 2013 Phase II AI, followed by the steps DSHS has taken to address those impediments.

**Impediment 1 - Not in My Backyard Syndrome (NIMBYism) can create barriers to housing choice for protected classes in some communities.**

DSHS prohibits the use of HOPWA Program funds for construction activities. DSHS Project Sponsors cannot use DSHS HOPWA Program funds to acquire, rehabilitate, convert, repair, dispose of, demolish, or construct property. DSHS authorizes the following services:

- Tenant-Based Rental Assistance (TBRA)
- Short-Term Rent, Mortgage, and Utility (STRMU)
- Facility-Based Housing Assistance (FBHA)
  - Short-Term Supportive Housing (STSH)
  - Transitional Supportive Housing (TSH)
- Permanent Housing Placement (PHP)
- Supportive Services

Of these services, TBRA, STRMU, PHP, and Supportive Services are client-determined and facilitate housing choice. Whether FBHA services are client-determined depends on the way the Project Sponsor has designed their service. FBHA encompasses all expenditures for or associated with a broad range of supportive housing facilities. Presently, all Project Sponsors that provide FBHA services are only making client-determined STSH payments to independent, temporary shelter vendors. DSHS has not approved any non-client-determined FBHA projects at this time. DSHS authorizes TBRA services. Project Sponsors coordinate rental assistance payments to owners without the use of vouchers. This payment method can have the effect of increasing the likelihood that a voucher-averse owner will work with Project Sponsors and eligible households. A voucher-less service design has expanded the stock of potential tenant-based units by increasing the number of owners who are willing to accept ongoing rental assistance payments. In turn, this helps reduce barriers to fair housing choice.

**Impediment 2 - There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements.**

DSHS disseminates informational emails from TDHCA and TWC about upcoming fair housing webinars with Administrative Agencies (AAs) and Project Sponsors. AAs and Project Sponsors are a mix of public and private non-profit entities. HUD considers HIV to be a disabling condition, so it is important for AAs and Project Sponsors to understand how fair housing laws apply to their work with eligible households and to understand reasonable accommodation and modification requests. DSHS encourages AAs and Project Sponsors to register for and attend these webinars. As part of the AI consultation process, TDHCA and DSHS held a fair housing webinar discussion on June 14, 2018. The webinar was attended by 48 AAs and Project Sponsors and gathered feedback on impediments to fair housing choice. In addition, the webinar provided a fair housing training on protected classes and reasonable accommodation requests.

**Impediment 3 - The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.**

DSHS has created and maintains a DSHS HOPWA Program Manual (“the Manual”), which addresses the Fair Housing Act, Affirmatively Furthering Fair Housing, the Americans with Disabilities Act, Affirmative Outreach, and Reasonable Accommodations. The Manual links to HUD’s Office of Fair Housing and Equal Opportunity Website and informational materials, including materials for persons who are victims of housing discrimination.

The DSHS HOPWA Program uses a standardized program agreement that informs households of their right to receive services in a non-discriminatory manner without regard to race, color, religion, sex, national origin, disability, and familial status. The program agreement also informs households of their right to 1) use Project Sponsor grievance procedures if their rights have been violated, and 2) file a fair housing complaint with HUD.

DSHS requires all AAs and Project Sponsors to have anti-discrimination and grievance protocols.

DSHS requires all Project Sponsors to have Affirmative Outreach policies that ensure all persons who qualify for the assistance, regardless of their race, color, religion, sex, age, national origin, familial status, or handicap, know of the availability of the HOPWA Program, including facilities and services accessible to persons with disabilities, and maintain evidence of implementation of the policies.

**Impediment 4 - Protected classes may experience disparities in home mortgage loan denials and high cost loans.**

Homeownership assistance is not an eligible activity under the HOPWA Program. DSHS has not undertaken activities to address homeownership.

**Impediment 5 - Lack of accessible housing and visitability standards limits fair housing choice for persons with disabilities.**

Project Sponsors must ensure their application offices are in easily accessible locations and that assisted units meet minimum Housing Quality Standards. Section 7 of the Manual, Ensuring

Access to the Program, outlines guidance on application office locations, providing information about housing assistance, methods of taking applications, information sharing, and waitlists. Section 10, Housing Quality Standards, outlines the requirements for assisted units (which includes a Habitability Standard for Access).

The Manual describes reasonable accommodations and provides examples of when property owners may be required to grant exceptions to their policies or allow persons with disabilities to make reasonable access-related modifications to their private living and common-use spaces. DSHS encourages AAs and Project Sponsors to advocate for reasonable accommodations with and on behalf of eligible households when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling. The Manual also provides examples of when it would be appropriate to grant reasonable accommodations to other programmatic requirements or guidance found in the Manual.

**Impediment 6 - There are barriers to mobility and free housing choice for protected classes.**

*TBRA Services*

DSHS authorizes TBRA services. Project Sponsors coordinate rental assistance payments to owners without the use of vouchers. This payment method can have the effect of increasing the likelihood that a voucher-averse owner will work with Project Sponsors and eligible households. A voucher-less service design has expanded the stock of potential tenant-based units by increasing the number of owners who are willing to accept ongoing rental assistance payments. In turn, this helps reduce barriers to fair housing choice.

Historically, the DSHS HOPWA Program has devoted approximately 60 percent of its annual program funds to TBRA services. TBRA is a rental subsidy used to help households obtain or maintain permanent housing, including assistance for shared housing arrangements, in the private rental housing market until they are able to enroll in the Section 8 Housing Choice Voucher (HCV) Program or other affordable housing programs. With TBRA, the household selects a housing unit of their choice. If the household moves out of the unit, payments to the owner will end and the household can move with continued assistance to another unit. In other words, TBRA is portable and moves with the household.

Per 24 CFR §574.320(a), the gross rent of TBRA-assisted units cannot exceed HUD's established rent standard. The gross rent must also be reasonable in relation to rents for comparable unassisted units in the private market and must not be in excess of rents charged by the owner for comparable unassisted units. The gross rent of the proposed unit must be at or below the lower of the rent standard or the reasonable rent. If the gross rent of the proposed unit exceeds the lower of the rent standard or the reasonable rent, then rental assistance services may not be provided. Locating units that comply with these requirements, as well as other requirements for rental assistance services, can sometimes be challenging for eligible households and Project Sponsors. In the interest of expanding fair housing choice, DSHS supports several approaches for troubleshooting rent standard and rent reasonableness requirements for rental assistance services:

The DSHS HOPWA Program uses HUD's Fair Market Rent (FMR) for the unit size per the household's county of residence as the rent standard. Alternatively, Project Sponsors may use a

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HUD-approved community-wide exception rent standard if one is locally available. Project Sponsors may request current copies of exception rent standard tables from local housing authorities. Using an exception rent standard further expands the stock of potential units, especially in tight rental markets where housing costs are high.

Per 24 CFR §574.320(a)(2), the Project Sponsor may increase the rent standard by up to 10 percent on a unit by unit basis for up to 20 percent of the units that receive rental assistance (i.e., Project Sponsors may use 110 percent of the rent standard for 2 out of 10 of the households that receive rental assistance services in a given program year). Increasing the rent standard on a case-by-case basis can help eligible households secure a unit of their choice that otherwise would not qualify for TBRA services.

Households receiving rental assistance services must receive a utility allowance if they pay a separate utility vendor in addition to rent and utilities paid to the owner. Households only receive an allowance for utility costs that are not paid by another source. If a household is able to secure documentation from a friend, family member, or local utility assistance program stating that they will assume ongoing responsibility for paying utility costs that the household would otherwise have to pay, this document can be used to waive specific utility allowances and reduce the gross rent of the proposed unit. Waiving a utility allowance and reducing the gross rent of the proposed unit increases the likelihood that a household's chosen unit will meet rent standard and rent reasonableness requirements and be approved for TBRA services.

DSHS encourages Project Sponsors to advocate with and on behalf of eligible households that have barriers to accessing housing (criminal history, poor rental history, eviction history, insufficient income, etc.) so that the household may secure their chosen unit.

DSHS encourages Project Sponsors and eligible households to negotiate reduced rents with owners so that the gross rent of the household's chosen unit will meet rent standard and rent reasonableness requirements and be approved for TBRA services.

Per 24 CFR §574.320(b), shared housing arrangements where two or more unrelated households live together are eligible for TBRA services. Shared housing arrangements further expand the stock of potential units by allowing eligible households to consider roommate scenarios and can often be a cost effective alternative to individual housing arrangements. Shared housing arrangements are always voluntary and subject to additional requirements as outlined in the DSHS HOPWA Program Manual in Appendix H: Rental Assistance Instructions for Shared Housing Arrangements.

The shared housing regulations at 24 CFR §982.615(b)(3) state that "an assisted person may not be related by blood or marriage to a resident owner." Per 24 CFR §982.306(d), Project Sponsors cannot provide housing assistance if the unit owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family. However, Project Sponsors may grant an exception to these regulations if they determine that approving the unit would provide a reasonable accommodation for a household member who is a person with disabilities (see the DSHS HOPWA Program Manual, Appendix J: "Can I Pay this Owner?").

Finally, DSHS authorizes the use of HOPWA funds for PHP services, which pays for initial move-in costs and can help eligible households relocate to a unit of their choice that complies with rent standard and rent reasonableness requirements.

#### *STRMU Services*

STRMU is a client-determined activity that provides short-term, stabilizing interventions to households experiencing a financial crisis as a result of their HIV health condition or a change in their economic circumstances. STRMU is designed to prevent households from becoming homeless by helping them remain in their own dwellings, and when utilized together with other efforts, including access to health care services, case management, benefits counseling, and employment or vocational services, works to stabilize assisted households.

DSHS seeks to foster long-term solutions to housing instability for households receiving time-limited housing assistance. Stand-alone STRMU payments are likely to create only a temporary solution for an unstable living arrangement unless connected to a long-term housing stabilization plan. Project Sponsors are encouraged to coordinate related housing efforts to assess the ongoing housing needs of these households and provide access to other permanent housing options for HOPWA-eligible persons and their households as appropriate.

#### *STSH Services*

STSH services provide temporary shelters to households experiencing homelessness as a bridge to permanent housing. Households that are experiencing homelessness are more likely to experience positive long-term housing stability when short-term assistance connects them to long-term assistance. STSH allows households an opportunity to develop individualized housing plans that guide their linkage to permanent housing. Per 24 CFR §574.330(c), Project Sponsors must, to the maximum extent practicable, provide each household receiving STSH services an opportunity for placement in permanent housing or housing appropriate to their assessed needs. Project Sponsors should initiate assessments of each households' supportive housing needs, begin development of an individualized housing and service plan, and consider the use of PHP and rental assistance or other affordable housing programs as needed to promote stable housing results.

STSH pays necessary minimum costs for temporary shelters, including post-incarceration re-entry facilities, recovery or respite facilities, sober or detoxification facilities, and other non-traditional housing arrangements on a nightly and/or bed-rate basis. STSH is a facility-based service. Presently, all Project Sponsors that provide FBHA services are only making client-determined STSH payments to independent temporary shelter vendors, like hotels and motels.

#### *PHP Services*

PHP services may be used to help households establish permanent residence in which continued occupancy is expected. Eligible PHP housing assistance costs include: Application fees, related credit checks, utility hookup fees and deposits, first month's rent, and reasonable security deposits necessary to move persons into permanent housing. PHP housing assistance costs may also include rental and utility arrears or other past expenses if a household must pay them to secure a new unit.

Households can be housed or experiencing homelessness. PHP can assist households in finding and moving into more affordable, permanent housing arrangements if long-term housing stability is not expected in their current arrangements. Similarly, if households are not living in a place meant for human habitation, PHP can assist households in establishing permanent residence in which continued occupancy is expected.

PHP services are appropriate in a variety of circumstances, including, but not limited to:

- If a household must locate to a new unit that meets rent standard and rent reasonableness requirements;
- If a surviving household member is fleeing domestic violence, dating violence, sexual assault, or stalking;
- If a household member has reasonable concerns about safety (actual and imminent threats if they remain within the same unit);
- If a household must locate a new unit that meets Habitability Standards when an owner cannot or refuses to bring a proposed unit into compliance; and
- If a household has identified a different unit that would be more accessible or visitable for household members with disabilities.

## **General Land Office**

GLO's efforts to affirmatively further fair housing and increase fair housing choice is included in Chapter 9 regarding Disaster Recovery.

## **Texas Workforce Commission – Civil Rights Division (TWC-CRD or CRD)**

TWC-CRD conducts fair housing enforcement and education in the State of Texas. While TWC-CRD does not receive HUD CPD funds or administer HUD CPD programs, their role in fair housing enforcement puts them in a unique position, and they do undertake fair housing activities. TWC-CRD activities have specifically addressed three impediments identified in the 2013 Phase II AI:

- Impediment 2 - There is inadequate information available to local governments, stakeholders and the public about fair housing requirements and programs to assist persons with disabilities and low income residents.
- Impediment 3 - The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.
- Impediment 4 - Protected classes may experience disparities in home mortgage loan denials.

Due in large part to the \$50,000 grant awarded to TWC-CRD by HUD in 2016, TWC-CRD continued to conduct an extensive fair housing community outreach campaign. One of the major goals of the grant is to emphasize outreach on disability issues. Below is a brief summary of the disability and low-income outreach activities that have been achieved by CRD with the grant since September 2016. TWC-CRD conducted 12 Fair Housing Overview and four Reasonable Accommodations/Modifications webinars. The webinars were attended by close to 1,100 participants. Participants included property managers, leasing agents, local housing authority staff, maintenance workers, and other fair housing stakeholders. The presentation slides and



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HUD/Department of Justice (DOJ) Memoranda on Reasonable Accommodations, Modifications, and Service Animals were available to all participants for downloading.

Staff provided 15 Fair Housing presentations and staffed booths for community and professional organizations throughout Texas. Approximately 1,300 individuals have been reached through these efforts. Organizations involved include Special Olympics Texas (SOTX) and the Community Association Institute (CAI). At each event, information regarding reasonable accommodations, reasonable modifications, and emotional support/support animals were discussed and informational brochures distributed. Figure 4-1 provides a list of the community and professional organizations, in-person trainings, and presentations.

**Figure 4-1: Texas Workforce Commission Outreach, Trainings, and Presentations**

<b>Date</b>	<b>Topic</b>	<b>Location</b>	<b>Attendees</b>
10/14/2016	SOTX Outreach Support Services Fair for Fall Classic	Bryan	115
10/20/2016 to 10/21/2016	Victoria Apartment Association	Victoria	55
3/11/2017 to 3/25/2017	TDA Austin Rodeo	Austin	500
3/14/2017	CAI Luncheon	San Antonio	74
4/4/2017	Garland Fair Housing Celebration	Garland	72
4/12/2017	Fair Housing Workgroup	Austin	14
5/26-28, 2017	Texas Apartment Association Education Conference	Fort Worth	106
7/13/2017	Multifamily Legal Summit	Houston	100
7/18/2017	TWC-CRD/Fair Housing Council of Greater San Antonio Reasonable Accommodations Training	New Braunfels	34
7/20/2017	TWC-CRD/Fair Housing Council of Greater San Antonio Reasonable Accommodations Training	Mission	11
7/25/2017	Texas Affiliation of Affordable Housing Providers (“TAAHP”) Conference	Austin	50
8/3/2017	CAI Houston Chapter	Houston	40
10/7/2017	Round Rock Hope in the Community Outreach	Round Rock	30
10/13/2017	SOTX Statewide Fall Classic Competition	Bryan	68
10/19/2017	Texas Chapter of the National Association of Housing and Redevelopment Officials	San Marcos	7
11/2/2017	Texas Apartment Association Legal Symposium	Austin	30

TWC-CRD placed bus transit advertising in Austin, Dallas-Fort Worth, Houston, Midland, and McAllen at a cost of approximately \$20,000 in December 2017. The bus ads included a photo of a man in a wheelchair with his dog, with the following message: "Housing discrimination hurts us all. Let's Work Together for Fair Housing." Figure 4-2 displays this advertisement.

**Figure 4-2: Texas Workforce Commission Bus Advertisement**



TWC-CRD also placed online ads on Facebook at a cost of more than \$20,000 between November and December 2017. The ads targeted the following geographic areas: Austin, Dallas-Fort Worth, Gulf Coast, Midland-Odessa, San Antonio, and the Rio Grande Valley. The ads were viewed by more than 450,000 people. The Facebook advertisement, shown in Figure 4-3, included a photo of a woman in a wheelchair with her arms around two children, with the following message: "Discrimination in housing rental, sales and lending is prohibited. The Civil Rights Division, in partnership with the U.S Department of Housing and Urban Development, are here to help consumers and housing providers."

**Figure 4-3: Texas Workforce Commission Facebook Advertisement**



TWC-CRD is also responsible for enforcing the Fair Housing Act in Texas, including complaints and cases involving lending discrimination. Figure 4-4 provides a list of the discrimination lending cases closed by TWC-CRD during Fiscal Years 2014 to 2018.

**Figure 4-4: TWC-CRD Lending Cases, FY 2014 through March 31, 2018**

<b>Totals</b>	<b>Fiscal Year</b>	<b>Resolution Type</b>	<b>Number of Lending Cases</b>
	2014	Complaint withdrawn by complainant after resolution	2
	2014	Complaint withdrawn by complainant without resolution	0
	2014	Conciliation/settlement successful	0
	2014	No cause determination	5
<b>FY Total 14</b>			<b>7</b>
	2015	Complaint withdrawn by complainant after resolution	0
	2015	Complaint withdrawn by complainant without resolution	1
	2015	Conciliation/settlement successful	2
	2015	No cause determination	10
<b>FY Total 15</b>			<b>13</b>
	2016	Complaint withdrawn by complainant after resolution	0
	2016	Complaint withdrawn by complainant without resolution	0
	2016	Conciliation/settlement successful	1
	2016	No cause determination	3
<b>FY Total 16</b>			<b>4</b>
	2017	Complaint withdrawn by complainant after resolution	1
	2017	Complaint withdrawn by complainant without resolution	0
	2017	Conciliation/settlement successful	1
	2017	No cause determination	3
<b>FY Total 17</b>			<b>5</b>
	2018	Complaint withdrawn by complainant after resolution	1
	2018	Complaint withdrawn by complainant without resolution	1
	2018	Conciliation/settlement successful	0
	2018	No cause determination	3
<b>FY Total 18</b>			<b>5</b>

## Chapter 5 - Regional Analysis

### Section Overview

This Chapter provides a regional level analysis of information presented in Chapter 2, Statewide Analysis, based on the Texas Department of Housing and Community Affairs' (TDHCA) 13 Uniform State Service Regions. It should be noted that the regions analyzed in this chapter are unique to TDHCA. Other state agencies administering HUD CPD funds in Texas have their own regional distribution and coverage of the state in the administration of their programs. For the sake of clarity and simplicity, TDHCA's service regions are used throughout this chapter.

This section will provide demographic, economic, and housing information on the State, much like Chapter 2, but at the more detailed, regional level. These regional analyses allow a more nuanced look at one of the largest states in the country and allow for variation that may exist between parts of the state.

The primary data sources for this chapter are the American Community Survey (ACS), Comprehensive Housing Affordability Strategy data (CHAS), the Texas Demographic Center (TDC), and the United States Census Bureau's On the Map data tool (On the Map). Other data sources are used infrequently and may include TDHCA-housed databases. Because of the size and scope of the state of Texas as well as the prevalence of geographically large, but sparsely populated areas of Texas, the State will use the United States Office of Management and Budget's Metropolitan Statistical Areas (MSA) as a proxy for urban and rural.

One limitation of the available data is that the definitions of "disability" used by the data sets is not identical to the definition given in the Fair Housing Act (FHA):

*"[The FHA] defines persons with a disability to mean those individuals with mental or physical impairments that substantially limit one or more major life activities. The term mental or physical impairment may include conditions such as blindness, hearing impairment, mobility impairment, HIV infection, mental retardation, alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness. The term major life activity may include seeing, hearing, walking, breathing, performing manual tasks, caring for one's self, learning, speaking, or working. The Fair Housing Act also protects persons who have a record of such an impairment, or are regarded as having such an impairment."*<sup>28</sup>

**Legal Note:** In light of the suspension of the AFFH rule and its state tool, the pending rule revisions regarding HUD's disparate impact rule, and the broad-reaching impact of the U.S. Supreme Court's opinion in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015), the inclusion in this chapter of the "Race and Ethnicity" sections by region (including R/ECAP and Diversity Index figures) is objected to, but included as an attempt to satisfy HUD's request for such analyses only. It is expressly disclaimed

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<sup>28</sup> The Department of Justice. "The Fair Housing Act", updated December 21, 2017. <<https://www.justice.gov/crt/fair-housing-act-1#disability>>.

## Regional Analysis

that any analysis of this type, or conclusions that may be drawn from such analyses, is either required or causally associated with a current policy or practice.

## Region 1—“High Plains”

**Point of Reference Cities:** Amarillo, Lubbock

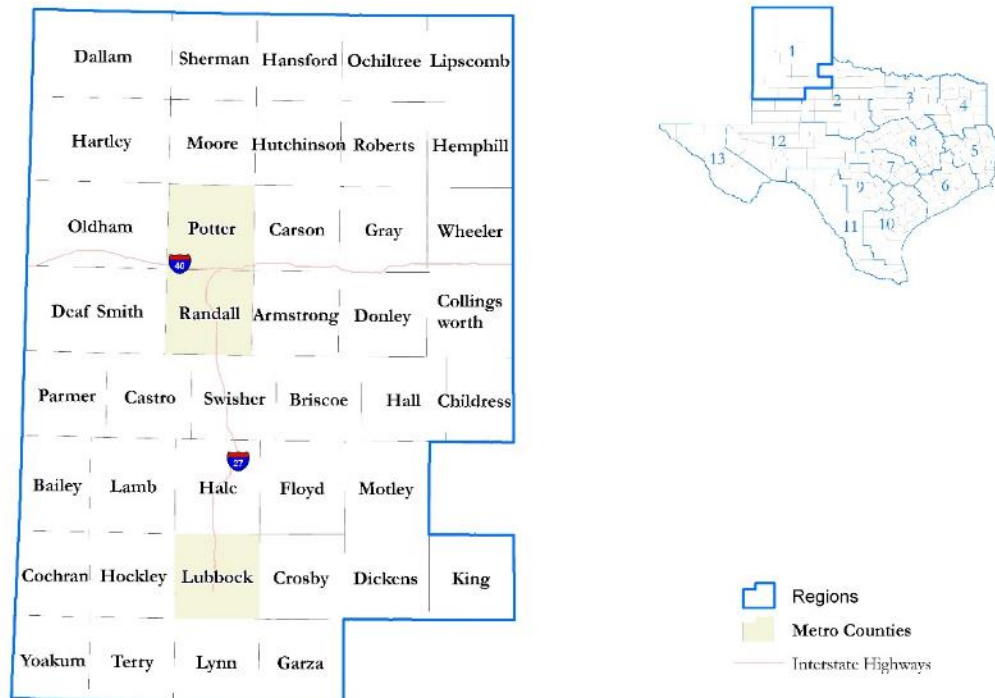
### Geo-Demographic Background

The High Plains Region is a primarily rural region of communities with diverse economies based around agriculture and ranching. The two major cities, Amarillo and Lubbock, contain most of the region’s population. These cities make up the primary educational, cultural, and economic hubs of the High Plains Region. Both cities arose as centers of cotton and cattle markets. Helium production, sorghum, corn, wheat and soybean farming, and meat packing are also major industries in the region. Recently, Amarillo and Lubbock have experienced moderate population growth, while Non-Metro counties in the region are seeing mostly population stagnation and even decline.

This region was originally home to Plains American Indians, but disease and war with European settlers decimated the population of the dominant Comanche tribe in the region by the 1870s. Growth in farming and ranching brought a wave of settlers to the region in the 1880s. Today American Indians represent a very small share of the population and there are no established reservations in the region.

The vast majority of residents in Region 1 identify their race and ethnicity as White, non-Hispanic, although this is shifting due to growth in the Hispanic population. Lower-income minority citizens live throughout the region in both small agricultural towns and in clusters in Amarillo and Lubbock. Figure 5-1 displays TDHCA Region 1 and the counties it contains.

**Figure 5-1: State of Texas’ Region 1 Counties**



## Regional Analysis

Figure 5-2 displays the population projections of Texas by race and ethnicity as a percentage of the population of Region 1 from 2010 through 2050. Race and ethnicity are combined for population projections. All persons identified as Hispanic or Latino, regardless of race, are categorized as Hispanic or Latino. Those identified as Non-Hispanic or Latino are categorized depending on their race. All races besides White and Black or African American have been combined into the 'Other' category due to the methodology and reporting employed by the Texas Demographic Center.

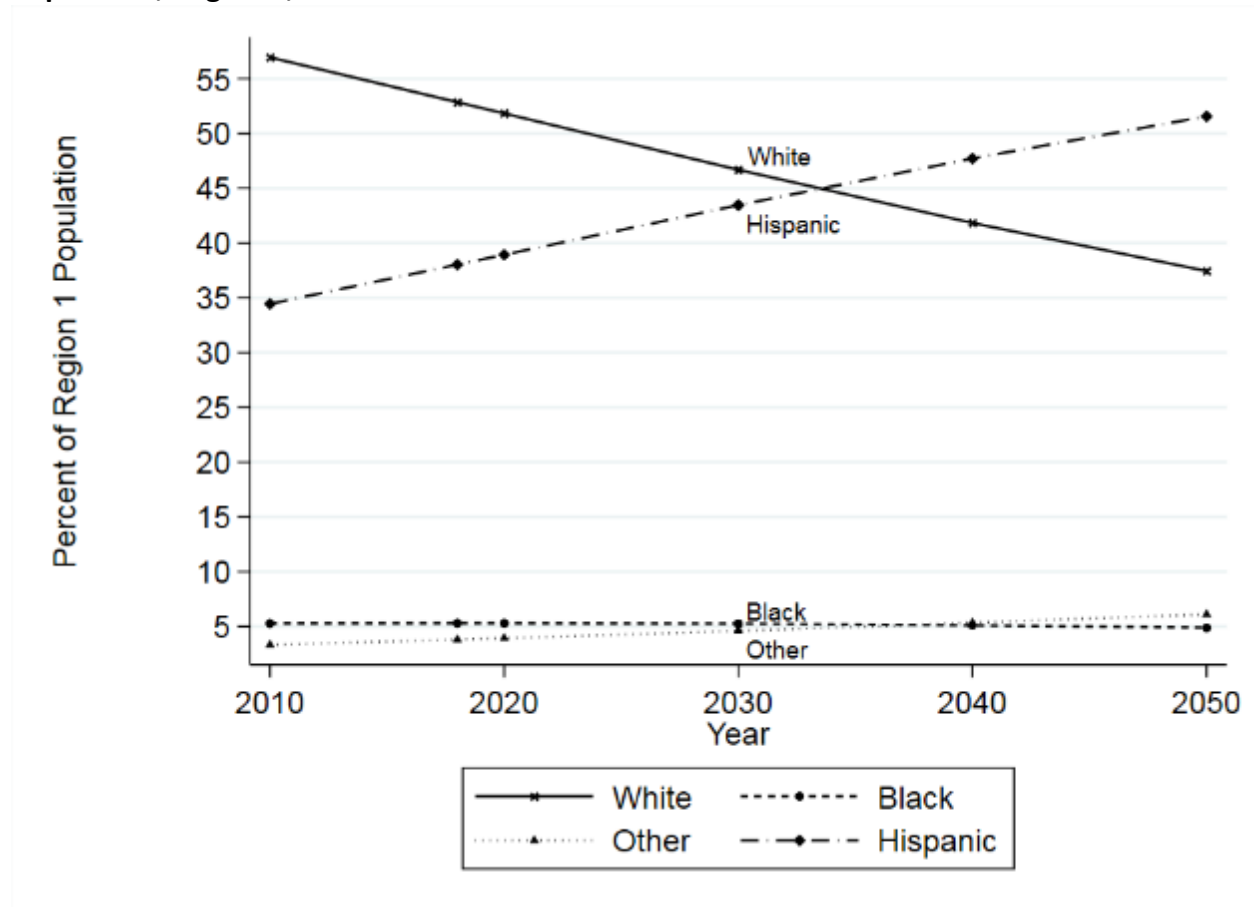
**Figure 5-2: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 1, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	57.0%	5.3%	3.3%	34.4%	839,586
2018	52.9%	5.3%	3.8%	38.0%	905,637
2020	51.8%	5.3%	3.9%	38.9%	922,887
2030	46.7%	5.3%	4.6%	43.5%	1,012,942
2040	41.8%	5.1%	5.3%	47.7%	1,098,537
2050	37.4%	4.9%	6.1%	51.6%	1,185,481

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Unlike the state as a whole, Region 1 is majority White, non-Hispanic or Latino, rather than majority-minority, meaning that minority populations together are greater than 50% of the state population as a whole. However, just like the rest of the state, the population is looking at a dramatic shift over the next several decades. Region 1 is projected to become a majority-minority region by 2030, and by 2050 the area will have a Hispanic majority. Unlike the rest of Texas, this area is not projected to experience explosive population growth. Instead, a modest growth rate of approximately 10% per decade is projected. Figure 5-3 is a visual representation of Figure 5-2.

**Figure 5-3: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 1, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

### Race and Ethnicity

As described in the statewide analysis, in order to assist communities in identifying Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs), HUD developed a census tract-based definition of R/ECAPs<sup>29</sup>. The definition involves a racial/ethnic concentration threshold and a poverty threshold. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-White population of 50% or more. Regarding the poverty threshold, HUD defines neighborhoods of extreme poverty as census tracts where 40% or more of individuals are living at or below the federal poverty level. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. A neighborhood can be considered a R/ECAP if it has a poverty rate that exceeds 40% or if it is three or more times the average tract poverty rate for the Metropolitan or Micropolitan Statistical Area, whichever threshold is lower. Census tracts with this level of poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. More detail on the definition and delineation of

<sup>29</sup>Affirmatively Furthering Fair Housing Data Documentation, Version 3.1, July 2016.



## Regional Analysis

R/ECAPs can be found in Appendix D. Figure 5-4 shows the R/ECAPS in Region 1. A list of the census tracts designated as R/ECAPS is available in Appendix D as well.

The Diversity Index is a metric designed to measure how equally distributed races and ethnicities are in a particular area. The index ranges from zero to one, where zero represents an area where every person is the same race and ethnicity and a one would represent an area where every person is a different race and ethnicity. A higher diversity index score means that the area's racial and ethnic composition is evenly distributed between the racial and ethnic groups represented and a lower score means that there is a concentration of only a few racial and ethnic groups out of the total population in that area. For more information on the Diversity Index refer to the Statewide Analysis (Chapter 2) or Appendix E. Figure 5-7 shows the Diversity Index by census tract for Region 1. Census tracts for which no data were available are shown in white. These tracts are typically airports, military bases, or other sparsely inhabited or uninhabited areas.

**Figure 5-4: Map of R/ECAPs, Region 1, 2018**

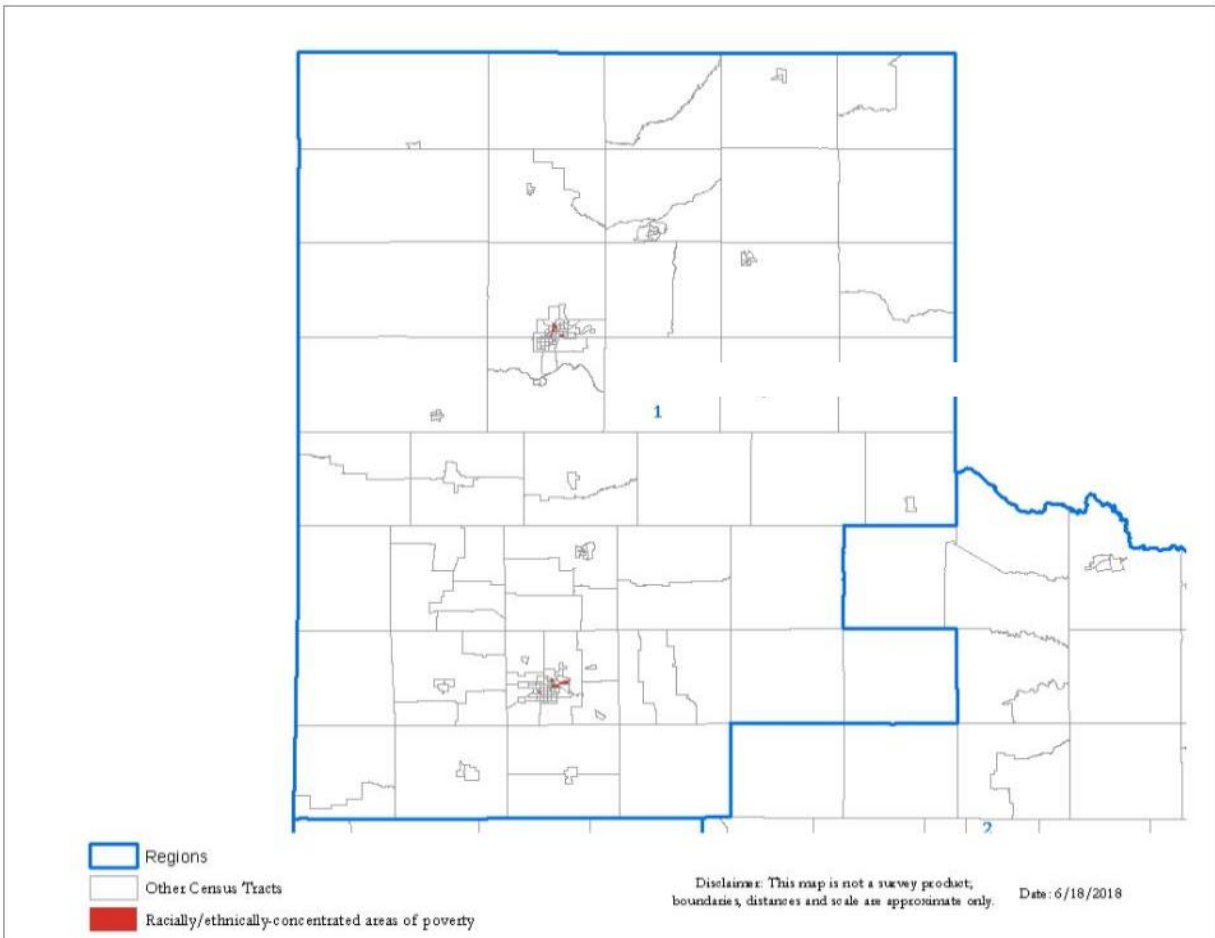
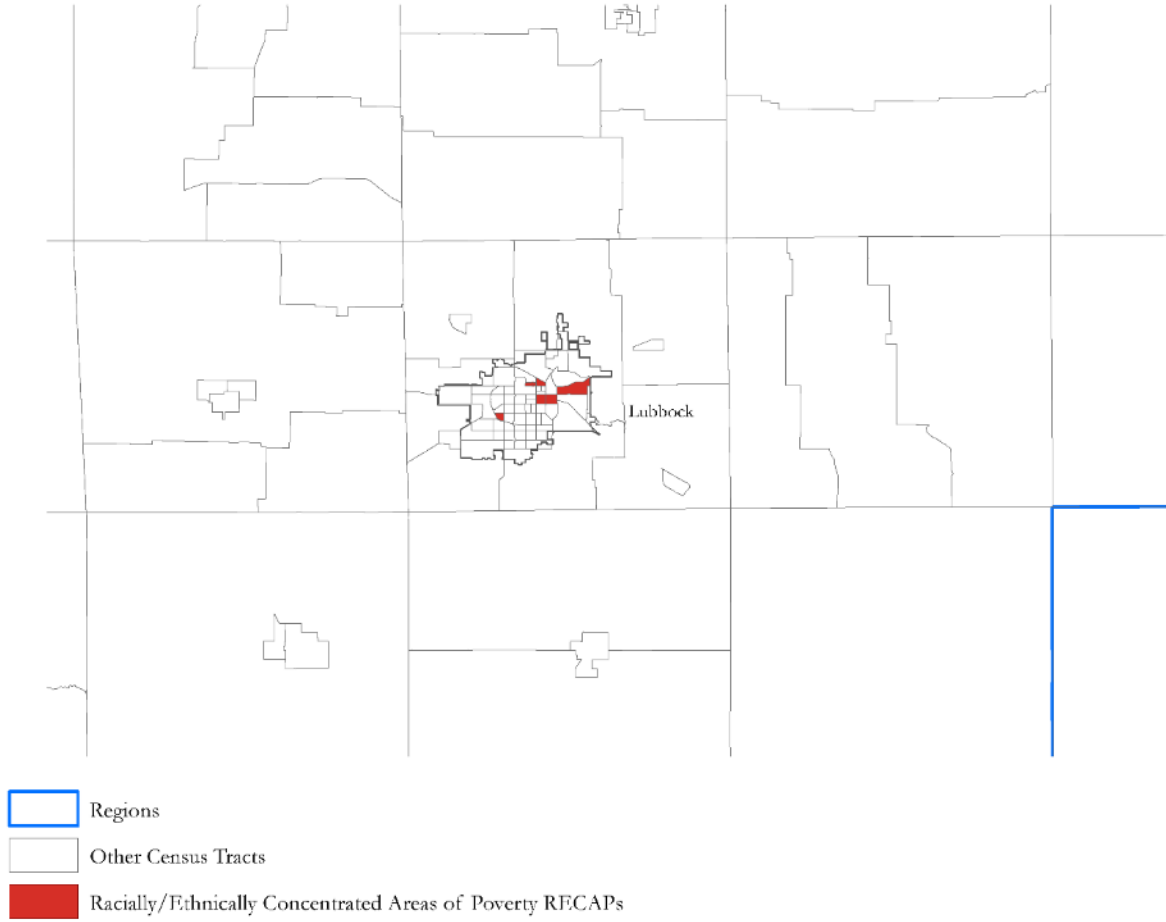
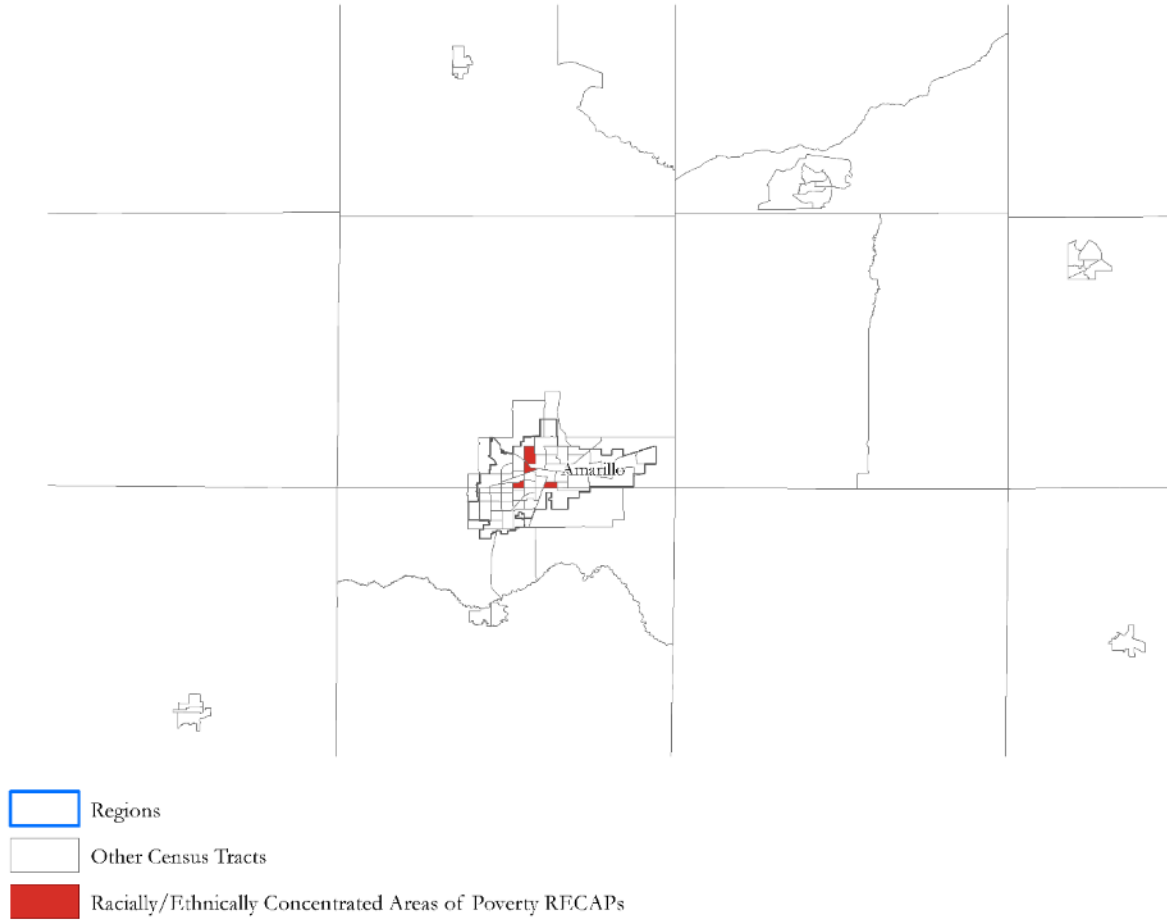


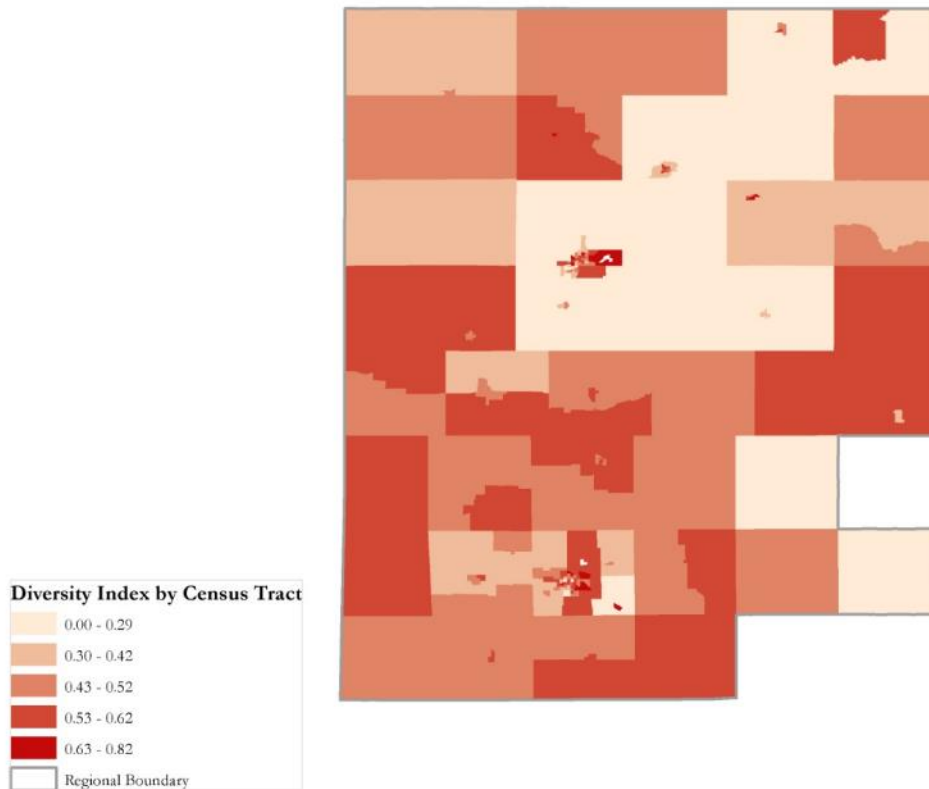
Figure 5-5: Map of R/ECAPs, Lubbock, TX, Region 2, 2018



**Figure 5-6: Map of R/ECAPs, Amarillo, TX, Region 2, 2018**



**Figure 5-7: Diversity Index, Region 1, 2018**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table B03002.

R/ECAPS in Region 1 are isolated within the urban cores of Amarillo and Lubbock. The racial and ethnic composition of Region 1 is somewhat evenly distributed, with only a handful of census tracts around Amarillo lacking diversity. The most diverse areas are concentrated in the two urban areas of Lubbock and Amarillo. Most of this diversity is binary, with White and Hispanic populations dominating the area, but there is also a small Black population. Detailed tables of the diversity index by census tract can be found in Appendix E

## Household Characteristics

Figure 5-8 shows the family characteristics of Region 1 households.

**Figure 5-8: Household and Family Characteristics, Region 1, 2012 to 2016**

	<b>Texas</b>	<b>Region 1</b>
Total Households	9,289,554	308,986
Average Household Size	2.84	2.67
Percent of Households with a Minor	37.6%	35.0%
Family Households	6,405,049	207,235
Average Family Household Size	3.44	3.26
Average Non-Family Household Size	1.28	1.30

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 1 has a lower rate of family households and households with minors than the State of Texas overall, however, a greater proportion of male- and female-headed households in Region 1 have a minor than at the state level. While the average household size and average family household size are smaller in Region 1 than Texas as a whole, the nonfamily household size for Region 1 is slightly larger than the average for Texas.

## Income

Figure 5-9 displays the percentage of the regional population by household income category and race and ethnicity for Region 1. In order to analyze household income, HUD’s Comprehensive Housing Affordability Strategy (CHAS) data will be used to present the race and ethnicity of Texas households by income category. The income categories used by CHAS are as follows:

- Extremely Low Income (ELI): at or below 30% Area Median Family Income (AMFI);
- Very Low Income (VLI): greater than 30% but less than or equal to 50% AMFI;
- Low Income (LI): greater than 50% but less than or equal to 80% AMFI;
- Moderate Income (MI): greater than 80% but less than or equal to 100% AMFI; and
- Greater than 100% AMFI.

Race and ethnicity are considered separately in the following data; persons who identified as Hispanic or Latino are included both in their identified race category and under Hispanic or Latino.

Overall, Region 1 aligns closely with the state’s household income distribution by race and ethnicity. Nearly two thirds of Black or African American households in Region 1 have incomes less than or equal to 80% AMFI. After Region 4, Region 1 has the highest rate of Black or African American households that are ELI. Over one quarter of Black or African American households have incomes at or below 30% AMFI. This is only slightly greater than the proportion of Black or African American households with incomes greater than 100% AMFI. Native Hawaiian or Other Pacific Islander households have similarly high percentages of households with incomes at or below 80% AMFI.

**Figure 5-9: Household Income Category by Race and Ethnicity, Region 1, 2010 to 2014**

	Texas	Region 1	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	12.6%	10.0%	26.0%	14.9%	13.9%	10.7%	18.9%	16.3%
VLI	12.2%	12.4%	10.5%	16.6%	8.9%	13.3%	30.5%	13.6%	16.1%
LI	16.8%	17.9%	15.4%	21.5%	18.5%	19.1%	25.4%	18.8%	23.2%
MI	9.5%	10.0%	9.2%	11.2%	11.7%	6.1%	5.6%	8.0%	11.5%
Greater than 100 Percent AMFI	48.5%	47.1%	54.8%	24.6%	46.0%	47.6%	27.7%	40.6%	32.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 1, 13.5% has a disability, which is slightly higher than the state’s rate of 11.6%. However, unlike other parts of the state, there are minimal differences in rates of disability between the Metro and Non-Metro areas of Region 1. Figure 5-10 shows prevalence of disability by disability type in Region 1, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 5-10: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 1, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	838,024	554,254	283,770
Percent of Population with a Disability	11.6%	13.5%	13.4%	13.8%
Percent of Population with a Hearing Difficulty	3.4%	4.2%	4.0%	4.7%
Percent of Population with a Vision Difficulty	2.5%	2.8%	2.8%	2.7%
Percent of Population with a Cognitive Difficulty	4.3%	4.7%	4.8%	4.3%
Percent of Population with an Ambulatory Difficulty	6.1%	7.2%	7.0%	7.6%
Percent of Population with a Self-Care Difficulty	2.4%	2.4%	2.5%	2.3%
Percent of Population with an Independent Living Difficulty	3.9%	4.1%	4.2%	4.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-11 shows the percent of the civilian non-institutionalized population of persons with a disability in Region 1 by gender and age. The higher rates of disability in Region 1 compared to the state are reflected in higher rates of disability among both men and women.

**Figure 5-11: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 1, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Percent of Population with a Disability	11.6%	13.5%	13.4%	13.8%
Percent of Males with a Disability	11.5%	13.2%	12.8%	13.8%
Percent of Female with a Disability	11.8%	13.9%	13.9%	13.8%
Percent of Minors With a Disability	4.2%	4.2%	4.7%	3.5%
Percent of Children Under Age 5 with a Disability	0.8%	1.0%	1.1%	0.7%
Percent of Children Aged 5-17 with a Disability	5.5%	5.5%	6.1%	4.5%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-12 shows the percent of the civilian non-institutionalized population of persons with a disability in Region 1 by race and ethnicity. Race and ethnicity are considered separately in the following data; persons who identified as Hispanic or Latino are included both in their identified race category and under Hispanic or Latino.

**Figure 5-12: Percent of Civilian Non-Institutionalized Population with Disability by Race/Ethnicity, Region 1, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Population	11.6%	13.5%	13.4%	13.8%
White	11.9%	13.6%	13.4%	14.0%
Black or African American	13.4%	15.6%	15.2%	17.5%
American Indian and Alaskan Native	15.8%	17.2%	18.2%	15.6%
Asian	5.7%	4.9%	4.2%	8.3%
Hawaiian and Other Pacific Islander	8.5%	14.4%	20.5%	7.3%
Some Other Race	9.2%	13.8%	14.7%	12.0%
Two or More Races	11.1%	12.0%	11.9%	12.3%
Hispanic or Latino	9.5%	10.8%	11.2%	10.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

Region 1 has a slightly higher overall poverty rate compared to the state as well as higher rates of individuals living below 150% and 200% of poverty. Figure 5-13 shows the prevalence of poverty in Region 1 by poverty level.

**Figure 5-13: Poverty Rates by Poverty Level, Region 1, 2012 to 2016**

	<b>Texas</b>	<b>Region 1</b>
Total Population for Whom Poverty Status is Determined	26,334,005	826,122
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.5%
Below 50% of Poverty	7.0%	7.6%
Below 150% of Poverty	27.3%	29.3%
Below 200% of Poverty	37.2%	40.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-14 shows the percent of individuals under the poverty line, or 100% of the federal poverty level, in Region 1 by age, gender, and race and ethnicity. Race and ethnicity are considered separately in the following data; persons who identified as Hispanic or Latino are included both in their identified race category and under Hispanic or Latino. Compared to the state, poverty in Region 1 is more heavily concentrated among Black or African American individuals and other racial minority groups, including Asian individuals and persons identifying as two or more races. Compared to other regions, Region 1 has the highest rate of poverty among Black and African American individuals at 31.8%.

**Figure 5-14: Poverty Rates by Age, Gender, and Race/Ethnicity, Region 1, 2012 to 2016**

	<b>Texas</b>	<b>Region 1</b>
Total Population for Whom Poverty Status is Determined	26,334,005	826,122
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.5%
Metro County	16.4%	17.7%
Non-Metro County	18.7%	17.1%
Under 18	23.9%	22.9%
Male	15.2%	15.8%
Female	18.2%	19.2%
White	15.5%	15.9%
Black or African American	22.6%	31.8%
American Indian and Alaskan Native	21.2%	24.2%
Asian	11.1%	21.8%
Hawaiian and Other Pacific Islander	14.0%	12.3%
Some Other Race	24.4%	22.3%
Two or More Races	17.2%	26.2%
Hispanic or Latino	24.2%	23.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

The Census Bureau’s On the Map Tool provides data at the census block level on the travel distance from work to home and home to work for individuals. This data provides information on transportation needs and jobs proximity. Figure 5-15 shows the share of total jobs (job counts) by distance between the Work Census Block and the Home Census Block of individuals in the Amarillo, TX Core Based Statistical Area (CBSA). Work Census Blocks are all located within the



listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 5-15: Share of Job Counts by Distance between Work Census Block and Home Census Block, Amarillo CBSA, TX, 2015**

	Count	Share
Total All Jobs	116,657	100.0%
Less than 10 miles	77,359	66.3%
10 to 24 miles	15,534	13.3%
25 to 50 miles	5,010	4.3%
Greater than 50 miles	18,754	16.1%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-16 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Lubbock, TX CBSA. A majority of job holders working in Region 1 live within 10 miles of their work. There is a group who travels more than 50 miles for work, but it is possible that this is simply transfer between Lubbock and Amarillo. However, it is more likely that people from surrounding communities commute into the CBSA for work.

**Figure 5-16: Share of Job Counts by Distance between Work Census Block and Home Census Block, Lubbock CBSA, TX, 2015**

	Count	Share
Total All Jobs	149,434	100.0%
Less than 10 miles	100,852	67.5%
10 to 24 miles	12,356	8.3%
25 to 50 miles	7,901	5.3%
Greater than 50 miles	28,325	19.0%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-17 shows the employment and living situation of individuals in each county of Region 1. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There is a high degree of mobility in and out of counties in Region 1. More individuals come in to Potter (Amarillo, TX) and Lubbock Counties for work than live and work in those counties respectively. 40% of all job holders living in these counties leave the county in which they live.

**Figure 5-17: Employment and Living Situations, Counties in Region 1, 2015**

County	Lived Outside of County, Worked in County	Lived and Worked in County	Lived in County, Worked Outside of County	Percent that Lived in County and Worked Outside of County
Armstrong	146	94	621	86.9%
Bailey	905	1,227	1,678	57.8%
Briscoe	192	158	282	64.1%
Carson	493	430	1,701	79.8%
Castro	1,022	1,130	1,690	59.9%
Childress	550	941	1,093	53.7%

Regional Analysis

<b>County</b>	<b>Lived Outside of County, Worked in County</b>	<b>Lived and Worked in County</b>	<b>Lived in County, Worked Outside of County</b>	<b>Percent that Lived in County and Worked Outside of County</b>
Cochran	136	274	869	76.0%
Collingsworth	216	525	544	50.9%
Crosby	446	678	1,700	71.5%
Dallam	2,374	1,942	1,637	45.7%
Deaf Smith	2,924	4,675	3,329	41.6%
Dickens	89	233	452	66.0%
Donley	746	450	577	56.2%
Floyd	549	1,043	1,349	56.4%
Garza	880	935	1,036	52.6%
Gray	3,283	5,501	3,591	39.5%
Hale	4,937	6,672	7,616	53.3%
Hall	224	430	620	59.0%
Hansford	894	1,179	958	44.8%
Hartley	1,760	519	1,447	73.6%
Hemphill	1,107	1,012	593	36.9%
Hockley	5,954	4,810	4,975	50.8%
Hutchinson	3,359	5,306	3,361	38.8%
King	17	10	121	92.4%
Lamb	1,414	1,757	3,614	67.3%
Lipscomb	794	392	657	62.6%
Lubbock	38,054	109,101	23,656	17.8%
Lynn	490	665	1,702	71.9%
Moore	3,393	4,461	3,316	42.6%
Motley	76	96	267	73.6%
Ochiltree	2,300	2,802	1,721	38.0%
Oldham	758	197	328	62.5%
Parmer	3,616	2,344	1,176	33.4%
Potter	47,534	32,169	17,491	35.2%
Randall	16,987	17,849	42,767	70.6%
Roberts	65	73	354	82.9%
Sherman	548	347	451	56.5%
Swisher	781	1,142	1,488	56.6%
Terry	1,715	1,908	2,928	60.5%
Wheeler	1,542	1,177	884	42.9%
Yoakum	2,015	1,593	1,111	41.1%
<b>Total</b>	<b>155,285</b>	<b>218,247</b>	<b>145,751</b>	<b>40.0%</b>

Source: On The Map data, 2015, with out of state employment data excluded.

## Regional Analysis

Figure 5-18 shows the mean travel time to work for counties in Region 1. Average commute times do not vary widely across counties within the region. Most individuals have commutes that are less than 20 minutes.

**Figure 5-18: Mean Travel Time to Work, Counties in Region 1, 2012 to 2016**

<b>County</b>	<b>Mean travel time to work (minutes)</b>
Armstrong	26.6
Bailey	19.8
Briscoe	21.9
Carson	19.7
Castro	16.2
Childress	14.9
Cochran	21.5
Collingsworth	18.1
Crosby	22
Dallam	13.3
Deaf Smith	13.7
Dickens	18.9
Donley	24.1
Floyd	15.7
Garza	20.1
Gray	19.9
Hale	16.7
Hall	15.7
Hansford	16.3
Hartley	11.2
Hemphill	16.7
Hockley	19.7
Hutchinson	19.1
King	13
Lamb	15.5
Lipscomb	18.4
Lubbock	17.2
Lynn	20.8
Moore	16.9
Motley	18.1
Ochiltree	18.5
Oldham	18.2
Parmer	15.2
Potter	18.1

## Regional Analysis

<b>County</b>	<b>Mean travel time to work (minutes)</b>
Randall	19.1
Roberts	20.4
Sherman	19.1
Swisher	19.9
Terry	20.7
Wheeler	18.6
Yoakum	13.7

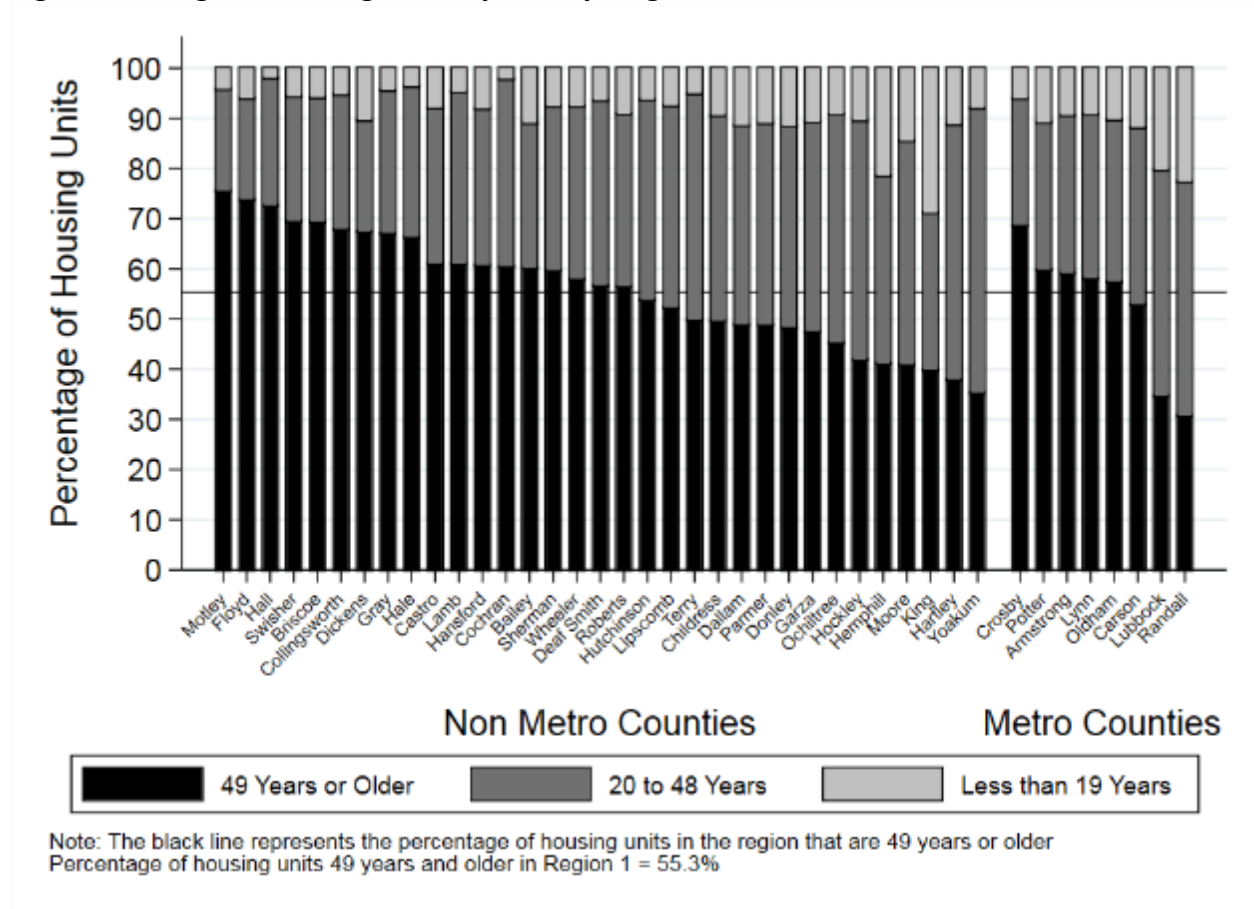
Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

### **Housing Profile**

HUD's Comprehensive Housing Affordability Strategy (CHAS) data include information on households experiencing housing problems. The four factors included in the HUD definition of housing problems can be used to analyze local housing markets and develop strategies for meeting housing challenges. These factors include households lacking complete kitchen facilities, households lacking complete plumbing facilities, cost burdened households, and overcrowded households. The State also analyzes data from the ACS to look at the age of the housing stock in the region, which can be useful in determining the condition of housing units and as a measure of housing unit growth.

Figure 5-19 shows the average age of housing stock by county in Region 1 as a percentage of the total housing stock.

Figure 5-19: Age of Housing Stock by County, Region 1, 2012 to 2016



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Region 1 has some of the oldest stock in the state, with some counties having more than 70% of their housing units being 49 years old or more. Figure 5-20 shows the data visually represented in Figure 5-19 in table form.

Figure 5-20: Age of Housing Stock by County, Region 1, 2012 to 2016

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Armstrong	59.2%	31.5%	9.4%
Bailey	60.1%	28.9%	10.9%
Briscoe	69.3%	24.8%	5.8%
Carson	52.9%	35.3%	11.8%
Castro	61.0%	31.1%	7.9%
Childress	49.6%	41.0%	9.4%
Cochran	60.5%	37.4%	2.1%
Collingsworth	67.9%	26.8%	5.3%
Crosby	68.7%	25.2%	6.1%
Dallam	48.9%	39.7%	11.4%
Deaf Smith	56.7%	36.9%	6.4%
Dickens	67.4%	22.2%	10.4%

## Regional Analysis

<b>County</b>	<b>49 Years or Older</b>	<b>20 to 48 Years Old</b>	<b>Less than 19 Years Old</b>
Donley	48.3%	40.1%	11.5%
Floyd	73.8%	20.2%	6.0%
Garza	47.5%	41.8%	10.7%
Gray	67.1%	28.5%	4.4%
Hale	66.3%	30.1%	3.6%
Hall	72.6%	25.4%	2.0%
Hansford	60.8%	31.2%	8.1%
Hartley	37.9%	50.9%	11.2%
Hemphill	41.1%	37.4%	21.5%
Hockley	41.9%	47.7%	10.4%
Hutchinson	53.8%	39.9%	6.3%
King	39.9%	31.3%	28.8%
Lamb	61.0%	34.3%	4.7%
Lipscomb	52.3%	40.2%	7.5%
Lubbock	34.6%	45.1%	20.3%
Lynn	58.1%	32.7%	9.2%
Moore	40.9%	44.6%	14.5%
Motley	75.5%	20.3%	4.1%
Ochiltree	45.3%	45.5%	9.2%
Oldham	57.4%	32.3%	10.3%
Parmer	48.9%	40.2%	10.9%
Potter	59.8%	29.3%	10.8%
Randall	30.7%	46.7%	22.6%
Roberts	56.5%	34.4%	9.1%
Sherman	59.7%	32.7%	7.6%
Swisher	69.5%	24.9%	5.6%
Terry	49.8%	45.1%	5.1%
Wheeler	58.0%	34.4%	7.6%
Yoakum	35.3%	56.7%	8.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

## Regional Analysis

Figure 5-21 shows households in Region 1 experiencing one or more housing problems.

**Figure 5-21: Percent of Households with One or More Housing Problems, Region 1, 2010 to 2014**

<b>Households with One or More Housing Problems</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 1 Total</b>	<b>State Total</b>
ELI Renter Households	79.0%	67.0%	76.2%	79.4%
VLI Renter Households	81.6%	65.8%	77.4%	82.7%
LI Renter Households	49.1%	32.9%	44.8%	52.1%
MI Renter Households	23.1%	13.5%	20.3%	24.2%
Renter Households with Incomes Greater than 100% AMFI	8.2%	7.1%	7.9%	8.5%
Percent Total Renter Households	49.3%	36.0%	45.7%	48.2%
ELI Owner Households	71.9%	65.6%	69.5%	73.6%
VLI Owner Households	53.5%	37.6%	46.8%	57.2%
LI Owner Households	35.9%	24.2%	31.4%	42.8%
MI Owner Households	21.7%	19.7%	21.0%	29.0%
Owner Households with Incomes Greater than 100% AMFI	6.8%	5.9%	6.5%	9.1%
Percent Total Owner Households	20.7%	18.0%	19.7%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

In all regions, the majority of ELI households and VLI renter households experience one or more of the housing problems identified by HUD. VLI renter households actually have higher rates of housing problems than ELI renter households for all regions. In many regions, the majority of VLI owner households and LI households also experience one or more housing problems. Renter households in all income categories are more likely to experience housing problems than owner households in the same categories, and households in a Metro county are more likely to experience housing problems than households in a Non-Metro county. Region 1 has the lowest rate of LI and MI renter households experiencing housing problems among all regions. Region 1 has the second lowest rate of households experiencing at least one problem for owner households.

Figure 5-22 shows renter and owner households in Region 1 that lack complete plumbing and/or kitchen facilities. Lacking complete plumbing and/or kitchen facilities is an indication of physical inadequacies in housing. While this is not a complete measure of physical inadequacy, the lack of plumbing and/or kitchen facilities can serve as a strong indication of one type of housing inadequacy.

**Figure 5-22: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 1, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 1 Total</b>	<b>State Total</b>
ELI Renter Households	1.6%	1.8%	1.7%	2.7%
VLI Renter Households	3.2%	5.5%	3.8%	2.3%
LI Renter Households	1.7%	1.6%	1.6%	1.8%
MI Renter Households	1.5%	0.5%	1.2%	1.4%
Renter Households with Incomes Greater than 100% AMFI	2.1%	1.2%	1.9%	1.2%
Percent Total Renter Households	2.0%	2.1%	2.1%	1.9%
ELI Owner Households	2.4%	2.6%	2.5%	2.6%
VLI Owner Households	3.4%	2.5%	3.0%	1.6%
LI Owner Households	0.6%	0.6%	0.6%	0.8%
MI Owner Households	0.1%	0.5%	0.2%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.3%	0.5%	0.3%	0.4%
Percent Total Owner Households	0.7%	0.9%	0.8%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Only a small percentage of total Texas households lack complete plumbing and/or kitchen facilities. With a few exceptions, the lower the household income, the higher the chance of that household lacking plumbing and/or kitchen facilities. Renter households are more likely to lack plumbing and/or kitchen facilities than owner households. Rates for households in Metro and Non-Metro counties have less of a noticeable pattern and vary from region to region. Region 1 is the only region where VLI renter and owner households are more likely than ELI households to lack complete plumbing and/or kitchen facilities.

Figure 5-23 shows renter and owner households in Region 1 that are cost burdened. Cost burdened households spend more than 30% of their monthly income on housing costs, including utilities. When so much is spent on housing, other basic household needs may suffer.

Housing cost burden is a serious issue that affects the individuals participating in a great number of our programs. For all regions, cost burden makes up the vast majority of housing problems that owner and renter households encounter. The majority of ELI households and VLI renter households in all regions experience housing cost burden. In all regions, rates of housing cost burden decrease as income increases. While in general ELI, VLI, and LI renter households are more likely to experience housing cost burden than owner households in the same income categories, owner households with incomes greater than 80% AMFI are more likely to experience housing cost burden than renter households in the same income categories. With a few exceptions, housing cost burden affects households in Metro counties more significantly than those in Non-Metro counties. Region 1 has relatively low rates of housing cost burden, though Metro county renter households are more heavily affected by housing cost burden than other household types.



**Figure 5-23: Percent of Households Experiencing Cost Burden, Region 1, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 1 Total</b>	<b>State Total</b>
ELI Renter Households	78.0%	62.8%	74.4%	77.3%
VLI Renter Households	79.5%	58.5%	74.0%	78.1%
LI Renter Households	44.6%	23.3%	38.9%	44.5%
MI Renter Households	15.7%	8.4%	13.6%	17.0%
Renter Households with Incomes Greater than 100% AMFI	3.8%	0.5%	2.8%	4.0%
Percent Total Renter Households	45.8%	29.3%	41.4%	43.3%
ELI Owner Households	69.4%	63.1%	66.9%	70.9%
VLI Owner Households	49.8%	32.7%	42.6%	52.8%
LI Owner Households	32.3%	20.3%	27.6%	37.5%
MI Owner Households	18.0%	12.0%	15.7%	24.3%
Owner Households with Incomes Greater than 100% AMFI	4.9%	2.7%	4.2%	6.9%
Percent Total Owner Households	18.1%	14.1%	16.7%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Figure 5-24 shows renter and owner households in Region 1 that are overcrowded. Overcrowding occurs when a residence accommodates more than one person per each room in the dwelling. Overcrowding may indicate a general lack of affordable housing in a community where households have been forced to share space, either because other housing units are not available, or because the units available are too expensive.

**Figure 5-24: Percent of Households Experiencing Overcrowding, Region 1, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 1 Total</b>	<b>State Total</b>
ELI Renter Households	4.9%	9.4%	6.0%	10.0%
VLI Renter Households	5.9%	9.1%	6.8%	10.7%
LI Renter Households	4.9%	9.2%	6.0%	7.9%
MI Renter Households	6.2%	4.9%	5.8%	6.2%
Renter Households with Incomes Greater than 100% AMFI	2.8%	5.7%	3.6%	3.6%
Percent Total Renter Households	4.7%	7.7%	5.5%	7.5%
ELI Owner Households	3.8%	1.4%	2.8%	5.5%
VLI Owner Households	2.7%	4.6%	3.5%	6.1%
LI Owner Households	4.0%	4.1%	4.1%	5.8%
MI Owner Households	3.7%	7.3%	5.0%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.7%	2.8%	2.1%	1.8%
Percent Total Owner Households Overcrowded	2.5%	3.6%	2.9%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

With some exceptions, overcrowding is a more prevalent issue than households lacking kitchen or plumbing facilities. The problem of overcrowding is generally more prevalent in lower income households, but regions follow this pattern less than with other housing problems. VLI

households tend to have higher rates of overcrowding than ELI households, and in some regions LI and MI households have higher rates than households in lower income categories. Owner households with incomes greater than 100% AMFI have the lowest rates of overcrowding across all regions with very few exceptions. Region 1 has relatively low rates of overcrowding compared to other regions, though rates are higher in Non-Metro than in Metro counties. ELI owner households in Non-Metro counties have the lowest rates of overcrowding in Region 1.

Figure 5-25 shows the average housing costs in Region 1. Housing costs in Region 1 are lower than in most other regions.

**Figure 5-25: Average Housing Costs, Region 1, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$668
Average Monthly Rent	\$680

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Figure 5-26 shows the number of bedrooms in renter and owner occupied housing units with complete plumbing and kitchen facilities in Region 1. A higher concentration of 1 bedroom units for rent may contribute to the housing problem of overcrowding, and may be further exacerbated by the prevalence of cost burden. ELI and VLI households may not be able to afford units with enough bedrooms for the household’s size.

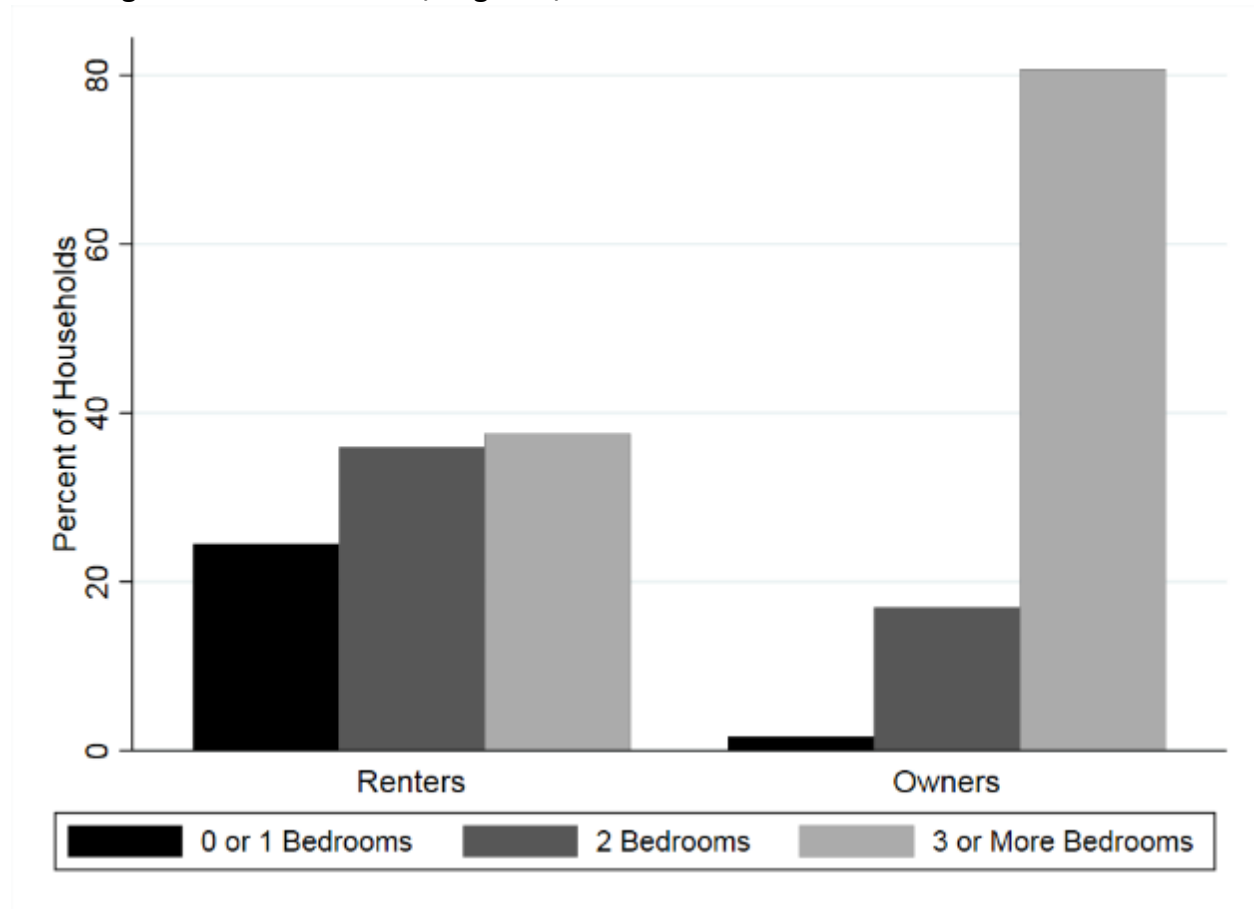
**Figure 5-26: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 1, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	108,681	25.0%	36.7%	38.3%
Owner Occupied	195,573	1.7%	17.1%	81.3%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-27 is a visual representation of the regional data from Figure 5-26.

**Figure 5-27: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 1, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

The breakdown of tenure and number of bedrooms in Region 1 is relatively close to state figures. Like all state service regions, the most prevalent housing type is owner occupied units with 3 or more bedrooms and the rarest housing type are 0 or 1 bedroom owner occupied units. Region 1 has the second lowest percentage of owner occupied units with 0 or 1 bedrooms, behind Region 3.

## Regional Analysis

Figure 5-28 maps the active multifamily properties in Region 1 participating in TDHCA programs.

**Figure 5-28: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 1, 2018**

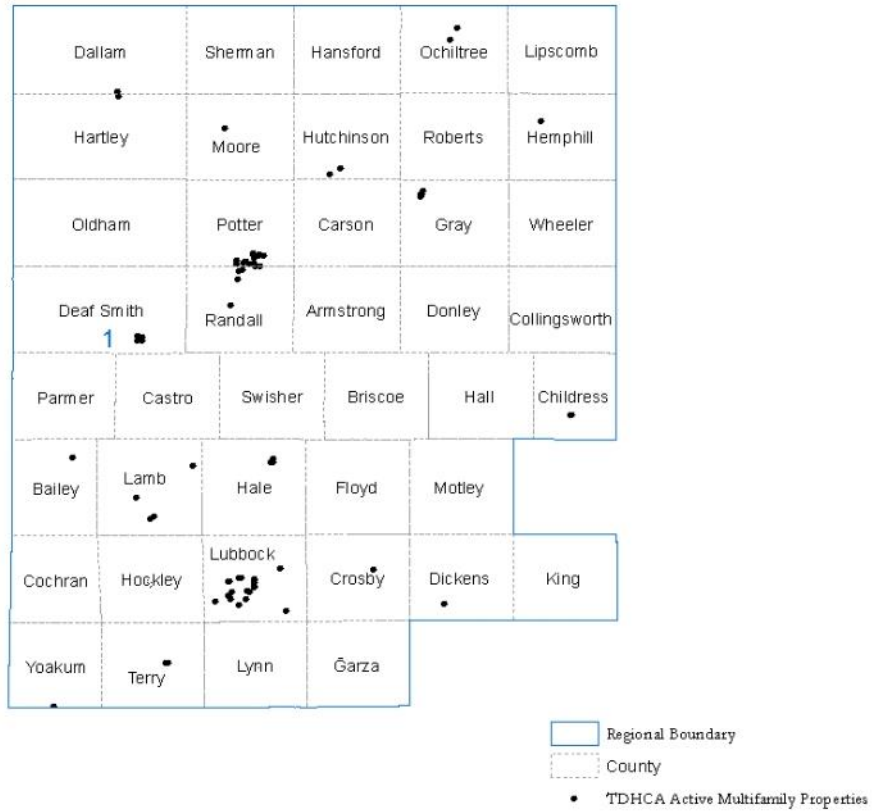


Figure 5-29 shows the number of multifamily properties participating in TDHCA programs by county in Region 1. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-29: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 1, 2018**

<b>Region/County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Bailey	1	16	16
Carson	1	60	54
Childress	2	80	80
Crosby	1	24	24
Dallam	2	100	100
Deaf Smith	5	288	285
Dickens	1	3	3
Garza	1	24	24
Gray	4	244	244
Hale	5	288	235
Hemphill	1	64	64
Hockley	4	150	129
Hutchinson	3	144	142
Lamb	5	68	68
Lubbock	22	2,655	2,442
Lynn	1	24	24
Moore	1	64	60
Ochiltree	2	96	92
Potter	21	1,850	1,683
Randall	5	639	636
Terry	2	72	72
Yoakum	1	3	3
<b>Total</b>	<b>91</b>	<b>6,956</b>	<b>6,480</b>

Source: TDHCA, Central Database, data pull from June 2018.

A majority of TDHCA assisted properties are clustered in and around Amarillo, which is in Potter and Randall counties, and Lubbock, which is in Lubbock County, with some pockets in outlying counties around smaller cities.

## Region 2—“Northwest Texas”

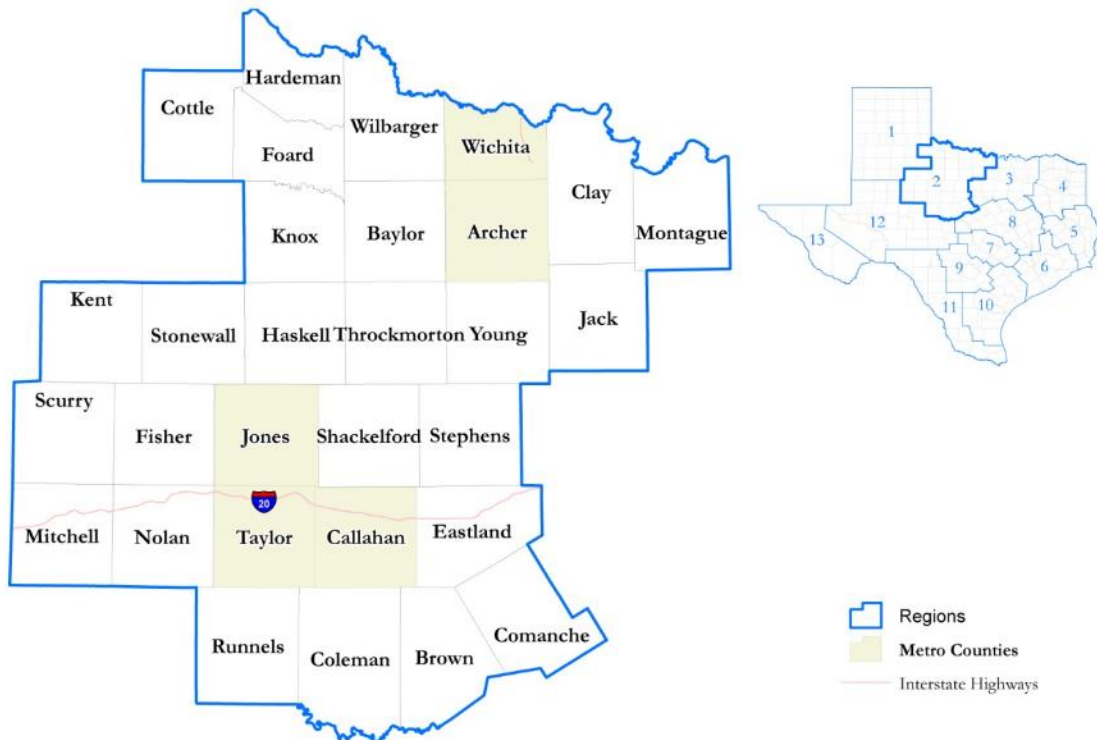
**Point of Reference Cities:** Abilene, Wichita Falls, Brownwood

### Geo-Demographic Background

Historically, the Northwest Region was an agricultural and livestock-based area, well positioned along railroad and cattle drive routes. Settlers came into the region to farm and raise cattle. The City of Abilene began as a stopping and shipping point for cattle on the Texas and Pacific Railway. In the mid-20th century, the discovery of oil in the southwest of the region boosted the regional economy. Wichita Falls, located on the border of Texas and Oklahoma, began as a railroad depot town.

There are three universities near Abilene. The region is predominantly White, non-Hispanic, with clusters of Black or African American individuals and other minority populations in the cities, especially Abilene and Wichita Falls. Figure 5-30 shows the counties of TDHCA Region 2.

**Figure 5-30: State of Texas’ Region 2 Counties**



## Regional Analysis

Figure 5-31 displays the population composition of Region 2 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

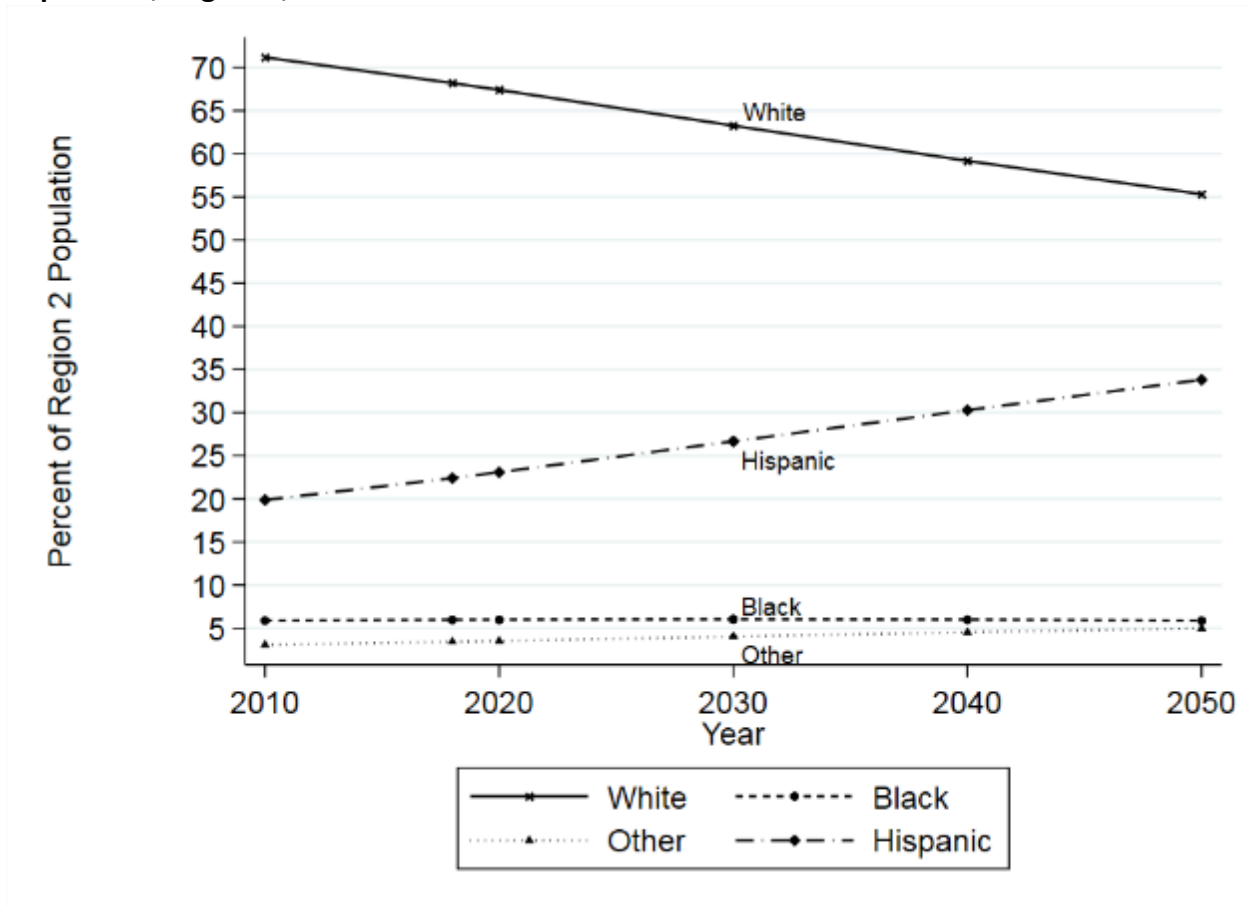
**Figure 5-31: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 2, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	71.2%	5.9%	3.1%	19.9%	550,250
2018	68.2%	6.0%	3.4%	22.4%	570,955
2020	67.4%	6.0%	3.5%	23.1%	576,162
2030	63.3%	6.0%	4.0%	26.7%	599,868
2040	59.2%	6.0%	4.5%	30.3%	614,605
2050	55.3%	5.9%	5.0%	33.8%	626,423

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 2 is anomalous in the state of Texas, as it is the only region projected to remain majority White for the next 30 years, though the percentage of the population identified as White will decrease. Region 2 is the only region with a projected stable, as opposed to decreasing, Black or African American population from 2010 to 2050. Figure 5-32 is a visual representation of Figure 5-31.

**Figure 5-32: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 2, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

**Race and Ethnicity**

Figure 5-33 shows the R/ECAPs in Region 2. Figure 5-34 and Figure 5-35 show R/ECAPs in Wichita Falls and Brownwood respectively. A list of the census tracts designated as R/ECAPS is available in Appendix Das well.



Figure 5-33: Map of R/ECAPs, Region 2, 2018

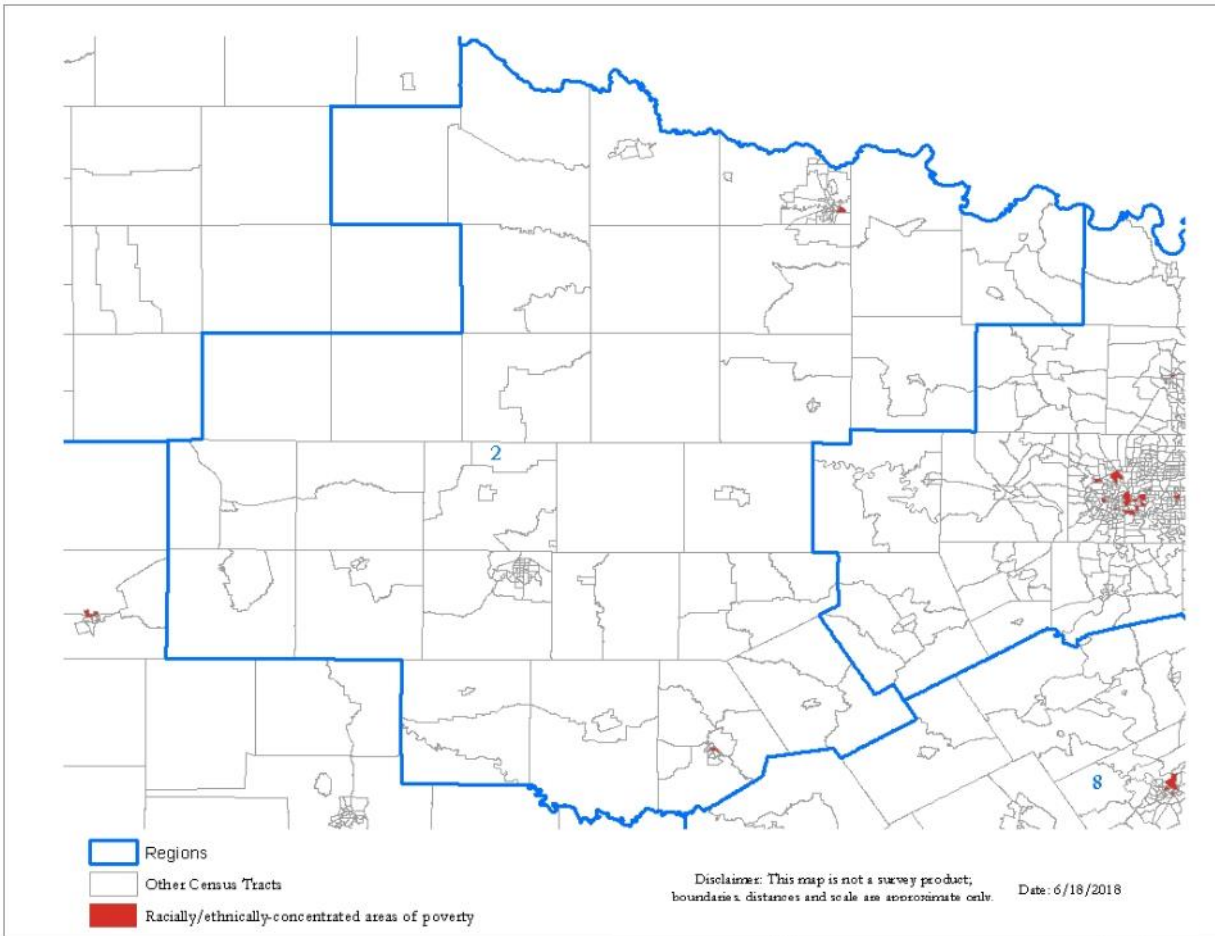


Figure 5-34: Map of R/ECAPs, Wichita Falls, TX, Region 2, 2018

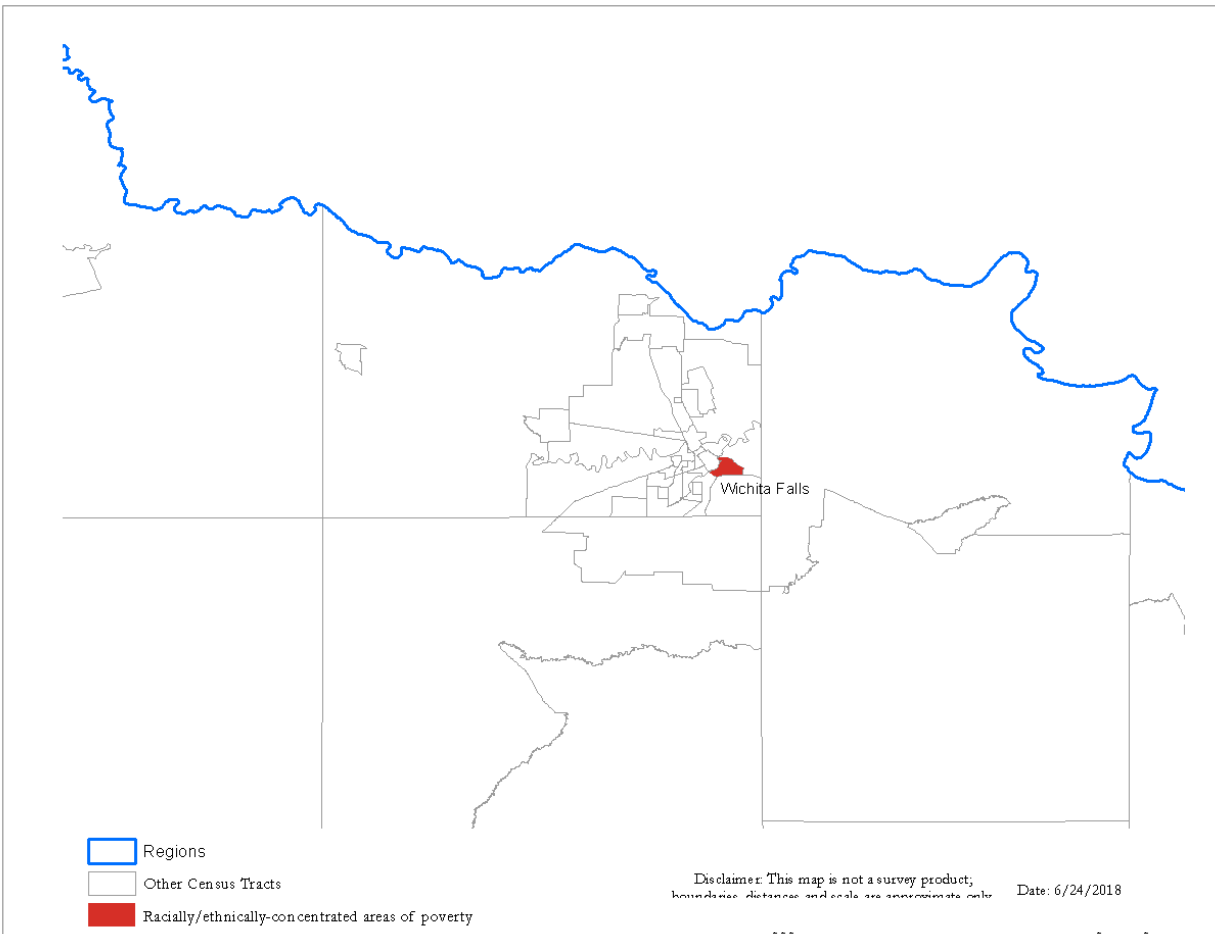


Figure 5-35: Map of R/ECAPs, Brownwood, TX Region 2, 2018

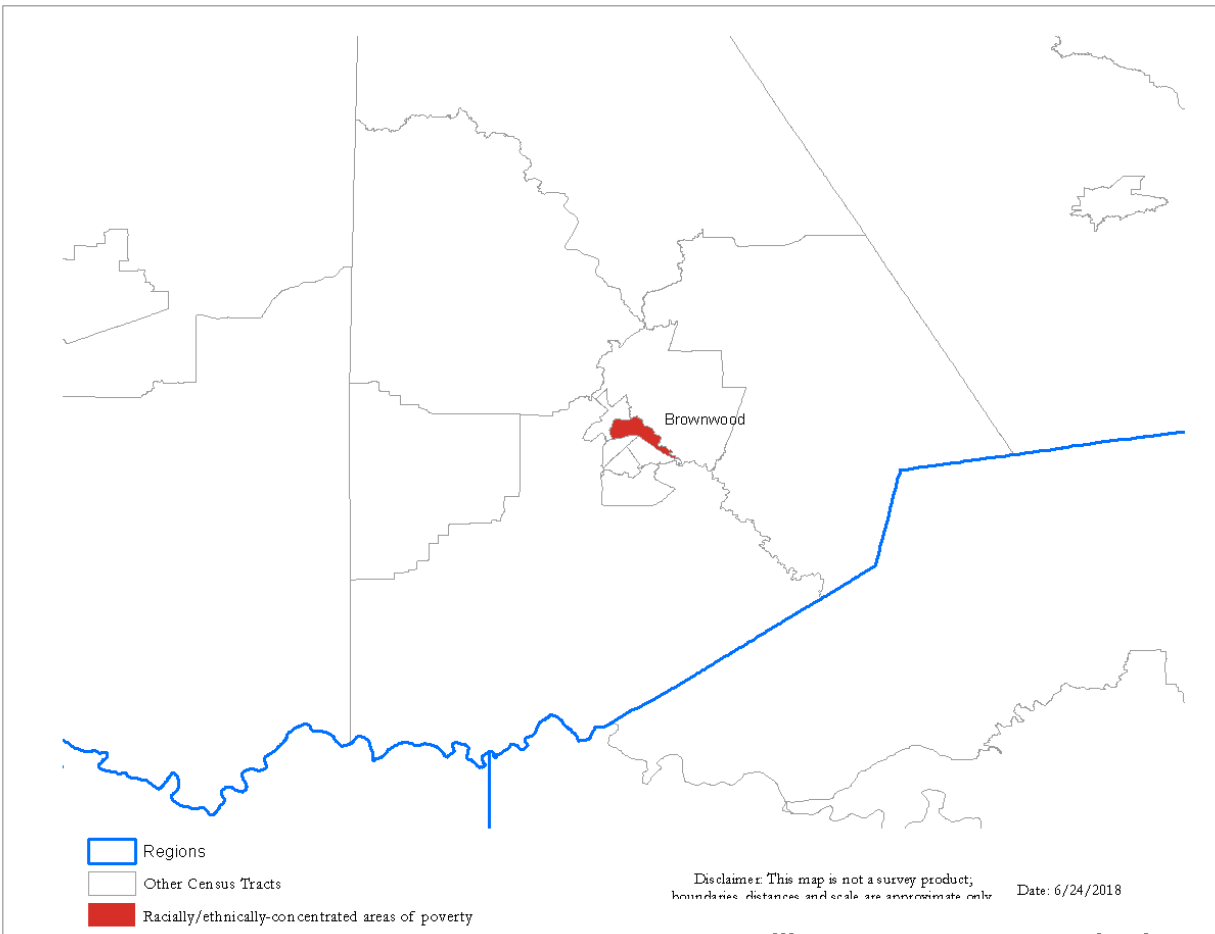
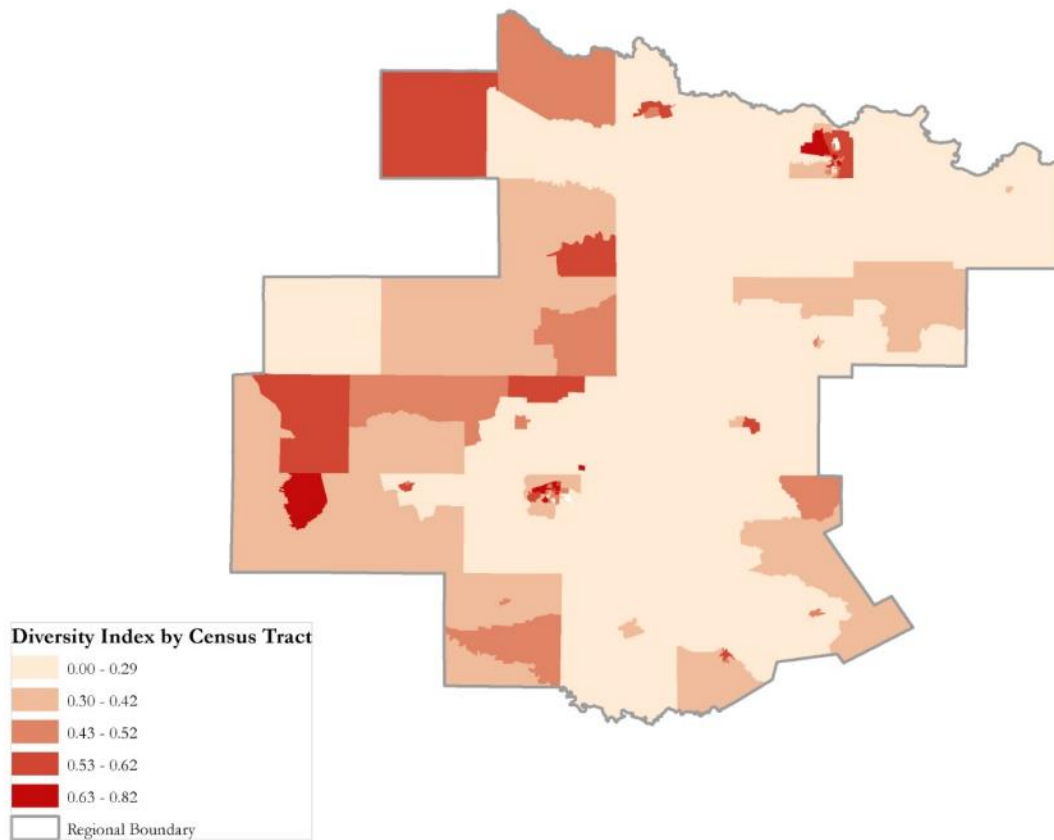


Figure 5-36 shows the Diversity Index by census tract for Region 2. Census tracts for which no data were available are shown in white.

**Figure 5-36: Diversity Index, Region 2, 2018**



R/ECAPS in Region 2 are specifically located only in the urban core of Wichita Falls and Brownwood. The majority of Region 2 has a low diversity index value. This is not surprising considering the regional population is nearly 70% White. The cities of Region 2, primarily Abilene and Wichita Falls, as well as some rural tracts in the western area of the region, do have census tracts with high diversity index values. Detailed tables of the diversity index by census tract can be found in Appendix E

### Household Characteristics

Figure 5-37 shows the household characteristics of Region 2 households. Unlike most regions and the state as a whole, the percent of male- and female-headed households with a minor in Region 2 are relatively close. The percent of male-headed households with a minor is higher in Region 2 than in any other region, while the percent of female-headed households with a minor is the median for all regional values. Region 2 has the lowest average household and lowest average family household sizes of all regions as well as the lowest rate of households with a minor.

**Figure 5-37: Household and Family Characteristics, Region 2, 2012 to 2016**

	Texas	Region 2
Total Households	9,289,554	202,338
Average Household Size	2.84	2.51
Percent of Households with a Minor	37.6%	30.8%
Family Households	6,450,049	134,003
Average Family Household Size	3.44	3.10
Average Non-Family Household Size	1.28	1.22

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

## Income

Figure 5-38 displays the percentage of the regional population by household income category and race and ethnicity for Region 2. Overall, Region 2 aligns closely with the state’s household income category distribution. 43.1% of Black or African American households are at or below 50% AMFI, and over 70% have incomes less than or equal to 100% AMFI. Hispanic households are also more likely to have incomes less than or equal to 100% AMFI, but to a lesser extent than Black or African American households. More than 30% of Hispanic households have incomes less than or equal to 50% AMFI, and almost 65% have incomes less than or equal to 100% AMFI.

**Figure 5-38: Household Income Category by Race and Ethnicity, Region 2, 2010 to 2014**

	Texas	Region 2	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	11.8%	10.1%	23.3%	12.5%	12.7%	51.3%	13.2%	16.2%
VLI	12.2%	12.4%	11.2%	19.8%	11.5%	6.8%	10.3%	18.0%	15.7%
LI	16.8%	17.6%	16.6%	16.4%	16.8%	19.4%	0.0%	20.8%	22.9%
MI	9.5%	9.9%	9.7%	11.5%	11.8%	9.4%	0.0%	13.1%	9.8%
Greater than 100 Percent AMFI	48.5%	48.4%	52.3%	28.9%	47.5%	51.6%	38.5%	35.0%	35.4%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 2, 16.7% has a disability, which is the second highest after Region 5. Compared to other regions, Region 2 has the highest rate of disability in Metro counties at 16.3%. Figure 5-39 shows the prevalence of disability and disability types in Region 2, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. For the region as a whole and in

both Metro and Non-Metro counties there is a higher rate of every type of disability compared to statewide rates.

**Figure 5-39: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 2, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Civilian Non-Institutionalized Population	26,478,868	512,560	292,536	220,024
Percent of Population with a Disability	11.6%	16.7%	16.3%	17.3%
Percent of Population with a Hearing Difficulty	3.4%	5.4%	5.3%	5.6%
Percent of Population with a Vision Difficulty	2.5%	3.3%	3.2%	3.4%
Percent of Population with a Cognitive Difficulty	4.3%	6.1%	6.3%	5.7%
Percent of Population with an Ambulatory Difficulty	6.1%	9.2%	8.7%	10.0%
Percent of Population with a Self-Care Difficulty	2.4%	3.2%	3.0%	3.3%
Percent of Population with an Independent Living Difficulty	3.9%	5.6%	5.6%	5.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-40 shows the percent of the civilian non-institutionalized population with a disability in Region 2 by gender and age. After Region 5, Region 2 has the highest rate of disability among both males and females.

**Figure 5-40: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 2, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Percent of Population with a Disability	11.6%	16.7%	16.3%	17.3%
Percent of Males with a Disability	11.5%	17.0%	16.6%	17.5%
Percent of Female with a Disability	11.8%	16.5%	16.0%	17.2%
Percent of Minors With a Disability	4.2%	4.9%	5.3%	4.3%
Percent of Children Under Age 5 with a Disability	0.8%	0.7%	0.7%	0.8%
Percent of Children Aged 5-17 with a Disability	5.5%	6.4%	7.1%	5.5%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-41 shows the percent of the civilian non-institutionalized population with a disability in Region 2 by race and ethnicity. Higher rates of disability among almost all races and ethnicities is consistent with the higher overall rate of disability in Region 2 compared to the state and other regions.

**Figure 5-41: Percent of Civilian Non-Institutionalized Population with Disability by Race/Ethnicity, Region 2, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	16.7%	16.3%	17.3%
White	11.9%	16.9%	16.6%	17.4%
Black or African American	13.4%	18.2%	19.3%	14.7%
American Indian and Alaskan Native	15.8%	22.0%	17.2%	31.5%
Asian	5.7%	6.4%	6.0%	8.7%
Hawaiian and Other Pacific Islander	8.5%	4.5%	0.0%	57.1%
Some Other Race	9.2%	14.7%	14.1%	16.2%
Two or More Races	11.1%	13.2%	11.3%	18.0%
Hispanic or Latino	9.5%	10.4%	11.1%	9.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

### Poverty

Region 2 has slightly higher rates of poverty than the state but overall aligns closely with state levels. Figure 5-42 shows the prevalence of poverty in Region 2 by poverty level.

**Figure 5-42: Poverty Rates by Poverty Level, Region 2, 2012 to 2016**

	Texas	Region 2
Total Population for Whom Poverty Status is Determined	26,334,005	509,064
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.2%
Below 50% of Poverty	7.0%	7.3%
Below 150% of Poverty	27.3%	28.8%
Below 200% of Poverty	37.2%	39.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-43 shows the percent of individuals under the poverty line, or 100% of the federal poverty level, in Region 2 by age, gender, and race and ethnicity. Across age and gender, Region 2 aligns closely with the state. Compared to the state, poverty in Region 2 is more heavily concentrated among Black or African American individuals and other racial minority groups, including Asian, Hawaiian and Other Pacific Islander, Other Race and two or more races. Compared to other regions, Region 2 has the one of the highest rates of poverty among Black or African American individuals at 31.6%. Nearly one third of Black or African American residents of Region 2 live below the poverty line. By population, Region 2 is the smallest region, but it also has some of the highest rates of poverty among racial and ethnic minority groups.

**Figure 5-43: Poverty Rates by Age, Gender, and Race/Ethnicity, Region 2, 2012 to 2016**

	Texas	Region 2
Total Population for Whom Poverty Status is Determined	26,334,005	509,064
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.2%
Metro County	16.4%	17.6%
Non-Metro County	18.7%	16.7%
Under 18	23.9%	23.7%
Male	15.2%	15.2%
Female	18.2%	19.1%
White	15.5%	15.4%
Black or African American	22.6%	31.6%
American Indian and Alaskan Native	21.2%	21.9%
Asian	11.1%	25.6%
Hawaiian and Other Pacific Islander	14.0%	57.0%
Some Other Race	24.4%	30.1%
Two or More Races	17.2%	24.3%
Hispanic or Latino	24.2%	26.4%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-44 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Abilene, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 5-44: Share of Job Counts by Distance between Work Census Block and Home Census Block, Abilene CBSA, TX, 2015**

	Count	Share
Total All Jobs	64,662	100.0%
Less than 10 miles	38,964	60.3%
10 to 24 miles	6,302	9.7%
25 to 50 miles	2,723	4.2%
Greater than 50 miles	16,673	25.8%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-45 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Wichita Falls, TX CBSA. In Region 2, approximately three in five individuals working in the Abilene and Wichita Falls CBSAs live within ten miles of their work. There is a large group of individuals who travel more than 50 miles, roughly one in four job holders in the Abilene CBSA and one in five in the Wichita Falls CBSA, this may be due to the fact that there are only three Metro counties in the region and persons in Non-Metro counties have to commute to the city for work.



**Figure 5-45: Share of Job Counts by Distance between Work Census Block and Home Census Block, Wichita Falls CBSA, TX, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	52,987	100.0%
Less than 10 miles	32,659	61.6%
10 to 24 miles	7,298	13.8%
25 to 50 miles	2,338	4.4%
Greater than 50 miles	10,692	20.2%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-46 shows the employment and living situation of individuals in each county of Region 2. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There is a high degree of mobility in and out of counties in Region 2. Two counties, Taylor County (Abilene, TX) and Wichita County (Wichita Falls, TX), account for approximately half of the entire region’s jobs.

**Figure 5-46: Employment and Living Situations, Counties in Region 2, 2015**

County	Lived Outside of County, Worked in County	Lived and Worked in County	Lived in County, Worked Outside of County	Percent that Lived in County and Worked Outside of County
Archer	933	396	2,853	87.8%
Baylor	368	741	684	48.0%
Brown	5,397	9,377	6,372	40.5%
Callahan	1,110	1,051	2,511	70.5%
Clay	406	826	3,533	81.1%
Coleman	773	1,418	1,627	53.4%
Comanche	1,344	2,409	3,395	58.5%
Cottle	90	157	280	64.1%
Eastland	4,295	3,103	4,010	56.4%
Fisher	284	529	1,111	67.7%
Foard	152	183	291	61.4%
Hardeman	538	684	707	50.8%
Haskell	722	818	1,358	62.4%
Jack	1,521	983	2,138	68.5%
Jones	1,737	1,664	5,389	76.4%
Kent	129	99	178	64.3%
Knox	471	485	861	64.0%
Mitchell	750	1,188	1,848	60.9%
Montague	2,157	2,811	4,867	63.4%
Nolan	3,023	3,365	3,261	49.2%
Runnels	1,004	1,919	2,531	56.9%
Scurry	3,121	3,603	2,953	45.0%
Shackelford	919	435	802	64.8%
Stephens	1,380	1,749	1,963	52.9%
Stonewall	177	207	357	63.3%
Taylor	19,575	39,525	16,907	30.0%
Throckmorton	142	245	357	59.3%
Wichita	15,073	35,353	11,891	25.2%
Wilbarger	1,984	3,877	2,281	37.0%
Young	2,761	4,299	3,625	45.7%
Total	72,336	123,499	90,941	42.4%

Source: On the map data, 2015, with out of state employment data excluded.

Figure 5-47 shows the mean travel time to work for counties in Region 2. Average commute times do not vary widely across counties within the region. Most individuals have commutes that are less than 25 minutes, with many counties having mean travel times to work under 20 minutes.

**Figure 5-47: Mean Travel Time to Work, Counties in Region 2, 2012 to 2016**

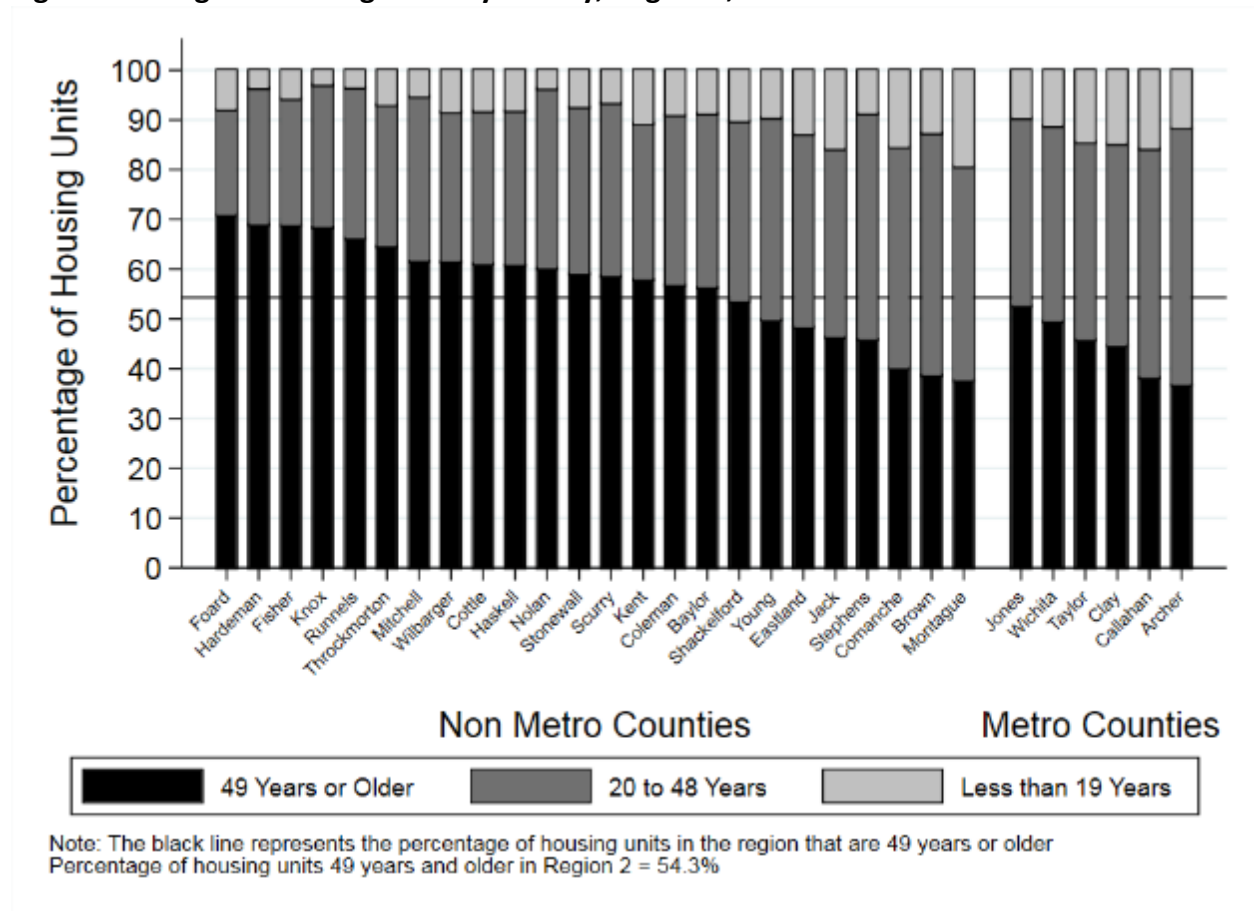
<b>County</b>	<b>Mean travel time to work (minutes)</b>
Archer	21.6
Baylor	12.7
Brown	17.2
Callahan	22.5
Clay	24.8
Coleman	25.6
Comanche	23.7
Cottle	15
Eastland	18.1
Fisher	20.7
Foard	16.6
Hardeman	17.7
Haskell	16.1
Jack	26.9
Jones	21
Kent	9.6
Knox	17.4
Mitchell	20.6
Montague	23.5
Nolan	15.3
Runnels	19
Scurry	15.9
Shackelford	19.3
Stephens	19.2
Stonewall	16.9
Taylor	16.7
Throckmorton	25.7
Wichita	15.5
Wilbarger	13
Young	14.9

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

### **Housing Profile**

Figure 5-48 shows the average age of housing stock by county in Region 2 as a percentage of the total housing stock.

Figure 5-48: Age of Housing Stock by County, Region 2, 2012 to 2016



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Much like Region 1, the majority of Region 2’s housing stock is 49 years old or more. Figure 5-49 shows the data visually represented in Figure 5-48 in table form.

**Figure 5-49: Age of Housing Stock by County, Region 2, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Archer	36.7%	51.6%	11.7%
Baylor	56.3%	34.9%	8.8%
Brown	38.6%	48.7%	12.7%
Callahan	38.1%	46.0%	15.8%
Clay	44.6%	40.6%	14.9%
Coleman	56.8%	34.2%	9.0%
Comanche	40.0%	44.5%	15.5%
Cottle	61.0%	30.7%	8.3%
Eastland	48.4%	38.8%	12.9%
Fisher	68.9%	25.4%	5.8%
Foard	70.9%	21.2%	8.0%
Hardeman	68.9%	27.4%	3.6%
Haskell	60.8%	31.0%	8.2%
Jack	46.3%	37.8%	15.9%
Jones	52.6%	37.7%	9.7%
Kent	57.9%	31.3%	10.8%
Knox	68.4%	28.6%	3.0%
Mitchell	61.6%	33.0%	5.4%
Montague	37.6%	43.0%	19.4%
Nolan	60.1%	36.1%	3.8%
Runnels	66.1%	30.3%	3.6%
Scurry	58.6%	34.8%	6.6%
Shackelford	53.6%	36.1%	10.3%
Stephens	45.8%	45.4%	8.8%
Stonewall	59.0%	33.5%	7.4%
Taylor	45.8%	39.7%	14.6%
Throckmorton	64.5%	28.4%	7.0%
Wichita	49.4%	39.3%	11.3%
Wilbarger	61.5%	30.0%	8.5%
Young	49.7%	40.6%	9.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-50 shows households in Region 2 experiencing one or more housing problems.

**Figure 5-50: Percent of Households with One or More Housing Problems, Region 2, 2010 to 2014**

<b>Households with One or More Housing Problems</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 2 Total</b>	<b>State Total</b>
ELI Renter Households	77.7%	59.8%	70.8%	79.4%
VLI Renter Households	79.3%	61.0%	71.8%	82.7%
LI Renter Households	56.0%	39.6%	49.8%	52.1%
MI Renter Households	24.6%	19.1%	22.7%	24.2%
Renter Households with Incomes Greater than 100% AMFI	7.8%	6.7%	7.4%	8.5%
Percent Total Renter Households	45.6%	37.2%	42.5%	48.2%
ELI Owner Households	77.2%	68.7%	72.7%	73.6%
VLI Owner Households	54.3%	46.5%	50.2%	57.2%
LI Owner Households	32.9%	24.0%	28.3%	42.8%
MI Owner Households	19.0%	16.0%	17.6%	29.0%
Owner Households with Incomes Greater than 100% AMFI	6.0%	5.8%	5.9%	9.1%
Percent Total Owner Households	19.8%	20.0%	19.9%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

Households in Metro counties in Region 2 are more likely than households in Non-Metro counties to experience at least one housing problem. The lower the household's income, the more likely they are to experience at least one housing problem. Region 2 has the lowest rates of housing problems for owner households with incomes greater than 80% AMFI (MI and above) and VLI renter households among all regions. Region 2 also has the third lowest rate of households experiencing at least one problem for owner households and the second lowest rate for renter households. Figure 5-51 shows renter and owner households in Region 2 that lack complete plumbing and/or kitchen facilities. Of the household problems, lacking kitchen and/or plumbing facilities is not a prevalent issue in this region or any region. VLI renter households in Region 2 are less likely to lack plumbing and/or kitchen facilities than all households with incomes greater than 50% AMFI, the only region where this is the case.

**Figure 5-51: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 2, 2010 to 2014**

Households Lacking Complete Plumbing or Kitchen Facilities	Metro	Non-Metro	Region 2 Total	State Total
ELI Renter Households	2.9%	3.4%	3.1%	2.7%
VLI Renter Households	1.7%	1.3%	1.5%	2.3%
LI Renter Households	3.0%	2.1%	2.7%	1.8%
MI Renter Households	1.8%	2.0%	1.8%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.2%	3.2%	1.9%	1.2%
Percent Total Renter Households	2.1%	2.5%	2.2%	1.9%
ELI Owner Households	3.0%	2.9%	2.9%	2.6%
VLI Owner Households	3.4%	1.9%	2.6%	1.6%
LI Owner Households	1.5%	1.4%	1.4%	0.8%
MI Owner Households	0.4%	0.8%	0.6%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.6%	0.7%	0.6%	0.4%
Percent Total Owner Households	1.1%	1.1%	1.1%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Figure 5-52 shows renter and owner households in Region 2 that are cost burdened.

**Figure 5-52: Percent of Households Experiencing Cost Burden, Region 2, 2010 to 2014**

Households Cost Burdened	Metro	Non-Metro	Region 2 Total	State Total
ELI Renter Households	75.8%	57.2%	68.6%	77.3%
VLI Renter Households	77.8%	58.4%	69.9%	78.1%
LI Renter Households	49.3%	33.6%	43.3%	44.5%
MI Renter Households	20.8%	7.8%	16.3%	17.0%
Renter Households with Incomes Greater than 100% AMFI	4.5%	1.5%	3.5%	4.0%
Percent Total Renter Households	42.1%	32.4%	38.5%	43.3%
ELI Owner Households	75.6%	67.1%	71.1%	70.9%
VLI Owner Households	49.8%	43.4%	46.5%	52.8%
LI Owner Households	30.3%	21.1%	25.6%	37.5%
MI Owner Households	16.8%	13.2%	15.1%	24.3%
Owner Households with Incomes Greater than 100% AMFI	4.8%	3.5%	4.3%	6.9%
Percent Total Owner Households	18.0%	17.5%	17.8%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Region 2 has particularly high rates of housing cost burden among ELI owner households in Metro counties compared to other regions. Besides relatively high rates of cost burden for ELI and VLI

## Regional Analysis

owner households, the majority of household types have low rates of cost burden. Figure 5-53 shows renter and owner households in Region 2 that are overcrowded.

**Figure 5-53: Percent of Households Experiencing Overcrowding, Region 2, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 2 Total</b>	<b>State Total</b>
ELI Renter Households	3.7%	4.4%	4.0%	10.0%
VLI Renter Households	4.3%	3.2%	3.9%	10.7%
LI Renter Households	6.2%	4.9%	5.7%	7.9%
MI Renter Households	3.2%	10.2%	5.6%	6.2%
Renter Households with Incomes Greater than 100% AMFI	2.6%	2.9%	2.7%	3.6%
Percent Total Renter Households	3.9%	4.4%	4.1%	7.5%
ELI Owner Households	2.3%	1.5%	1.8%	5.5%
VLI Owner Households	4.7%	2.3%	3.4%	6.1%
LI Owner Households	2.2%	1.9%	2.0%	5.8%
MI Owner Households	1.9%	2.3%	2.1%	4.5%
Owner Households with Incomes Greater than 100% AMFI	0.7%	1.6%	1.1%	1.8%
Percent Total Owner Households Overcrowded	1.5%	1.8%	1.6%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Region 2 has the lowest rates of overcrowding for renter and owner households compared to other regions. However, there is a noticeable spike for MI renter households in Non-Metro counties. ELI owner households in Region 2 are more likely to lack complete plumbing and kitchen facilities than they are to experience overcrowding, one of two regions where households have higher rates of lacking facilities than overcrowding in a particular income category. Figure 5-54 shows the average housing costs in Region 2.

**Figure 5-54: Average Housing Cost, Region 2, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$527
Average Monthly Rent	\$598

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Similar to Region 1, Region 2 tends to have lower monthly housing costs than the regions of the state with a larger Metro population. Figure 5-55 shows the number of bedrooms in renter and owner occupied housing units in Region 2.



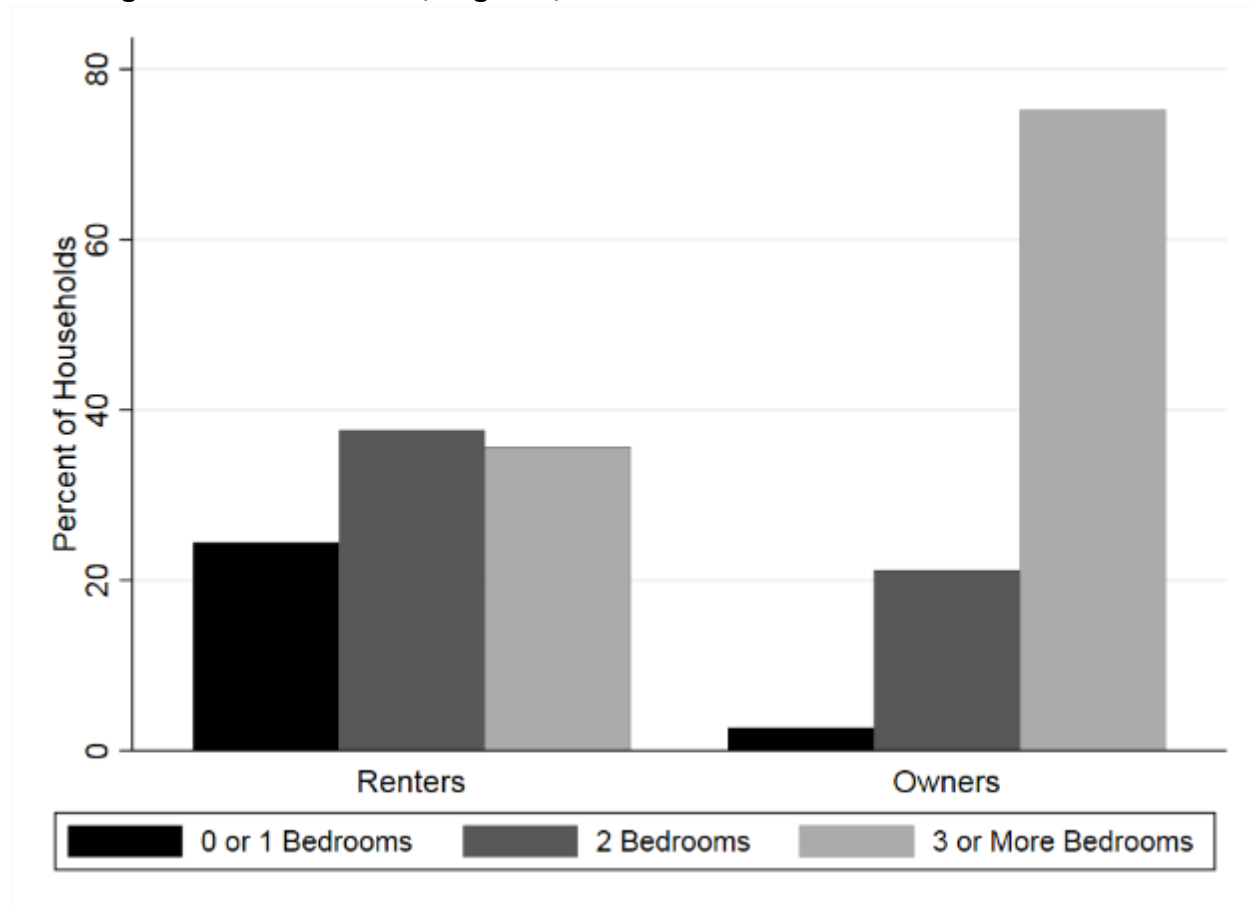
**Figure 5-55: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 2, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	64,286	25.0%	38.5%	36.5%
Owner Occupied	135,445	2.7%	21.4%	76.0%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-56 is a visual representation of the regional data from

**Figure 5-56: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 2, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Region 2 has the highest percentage of owner occupied units with 2 bedrooms and the lowest percentage of owner occupied units with 3 or more bedrooms among all regions. While the

## Regional Analysis

profile for renter occupied units is close to state figures, the tenure and unit size profile for owner occupied units in Region 2 varies from state percentages more than any other region due to the high share of 2 bedroom and low share of 3 bedroom owner occupied units. Figure 5-57 maps the active multifamily properties in Region 2 participating in TDHCA programs.

**Figure 5-57: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 2, 2018**

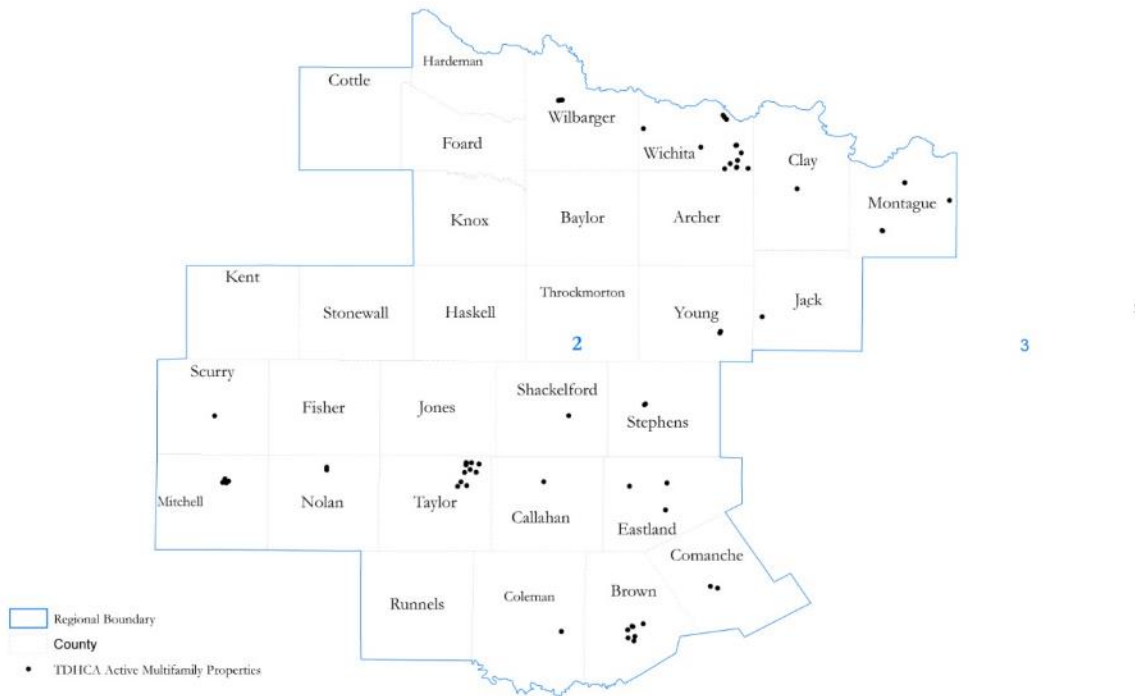


Figure 5-58 shows the number of multifamily properties participating in TDHCA programs by county in Region 2. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-58: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 2, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Brown	10	598	540
Callahan	1	24	24
Clay	2	97	85
Coleman	1	24	24
Comanche	2	70	49
Eastland	4	174	174
Jack	3	76	76
Mitchell	4	66	66
Montague	4	156	150
Nolan	2	86	86
Scurry	1	80	80
Shackelford	1	40	40
Stephens	2	56	56
Taylor	12	1,226	1,180
Wichita	18	1,276	1,244
Wilbarger	3	132	129
Young	2	88	88
<b>Total</b>	<b>72</b>	<b>4,269</b>	<b>4,091</b>

Source: TDHCA, Central Database, data pull from June 2018.

Properties are clustered primarily in Wichita, Taylor, and Brown counties, which contain Wichita Falls, Abilene, and Brownwood, respectively. A notable cluster is also visible in Colorado City in Mitchell County.

## Region 3—“Metroplex”

**Point of Reference Cities:** Dallas, Fort Worth, Denton

### Geo-Demographic Background

The Metroplex Region is the most populous region in the State, containing more than one-fourth of the state’s entire population. A large number of corporate headquarters, information technology companies, energy companies, defense contractors, farming and ranching industries, and tourism activity support the region’s economy.

Historical records indicate that the region began to gain population due to its position at the crossroads of north-south and east-west railroad lines. The region became the center of the oil and cotton industries. In the mid-20<sup>th</sup> century, Dallas became a convergence point of interstate highways from all directions. Dallas’ status as a crossroads and transportation hub continues to this day with the Dallas-Fort Worth airport serving as an “inland port.”

Historically, the region was divided along racial and ethnic lines by major highways and geographic barriers. This institutional separation influenced settlement patterns in the area. The Metroplex area has also had a history of litigation surrounding fair housing.<sup>30</sup> New business center development, housing, and population growth have tended to be more rapid in the suburban areas north of Dallas and Fort Worth, while growth has tended to be weaker in the southern part of the region. Figure 5-59 shows the counties of TDHCA Region 3.

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<sup>30</sup> See State of Texas Analysis of Impediments, p. 13 and 14 (2003); State of Texas Plan for Fair Housing Choice: Analysis of Impediments, Section VI (2013).

**Figure 5-59: State of Texas' Region 3 Counties**

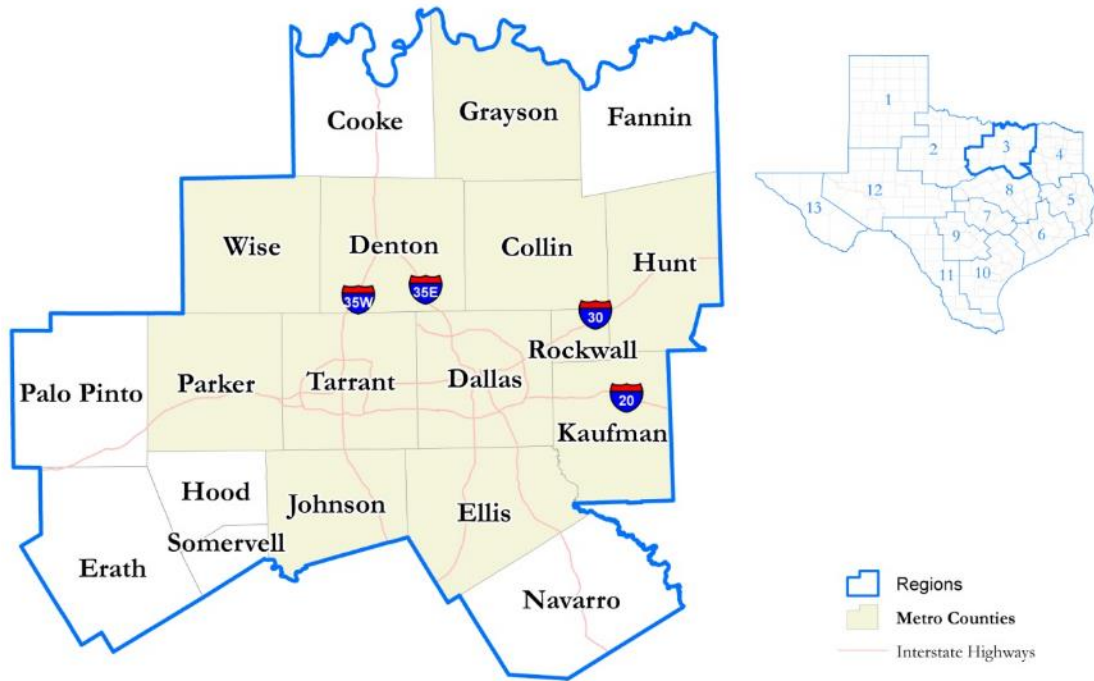


Figure 5-60 displays the population projections of Texas by race and ethnicity as a percentage of the population of Region 3 from 2010 through 2050.

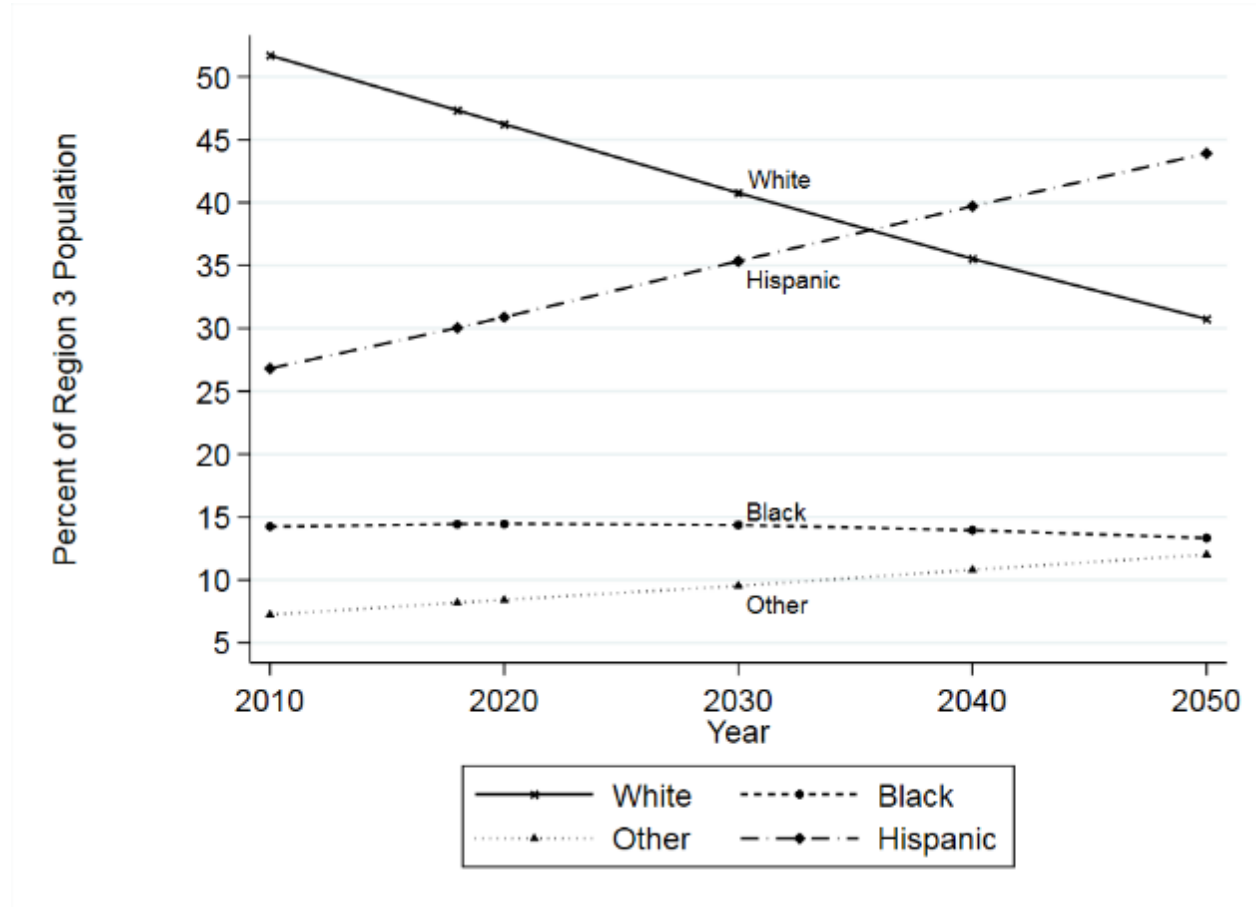
**Figure 5-60 : Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 3, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	51.7%	14.2%	7.2%	26.8%	6,733,179
2018	47.3%	14.4%	8.2%	30.0%	7,528,332
2020	46.2%	14.5%	8.4%	30.9%	7,735,274
2030	40.8%	14.4%	9.5%	35.3%	8,839,425
2040	35.5%	14.0%	10.8%	39.7%	10,015,740
2050	30.7%	13.3%	12.0%	43.9%	11,229,837

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 3 is already majority-minority, and is projected to continue to be majority-minority. Unlike other parts of the state, however, the Metroplex will maintain a high degree of racial and ethnic diversity, despite a shrinking White population. Almost all of the growth in the area is predicted to be among Hispanic residents, with some more modest increases among other minorities. Figure 5-61 is a visual representation of Figure 5-60.

**Figure 5-61: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 3, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

**Race and Ethnicity**

Figure 5-62 shows the R/ECAPs in Region 3. Figure 5-63 and Figure 5-64 show R/ECAPs in Denton, the Dallas-Fort Worth area, and Greenville respectively. A list of the census tracts designated as R/ECAPS is available Appendix Das well.

Figure 5-62: Map of R/ECAPs, Region 3, 2018

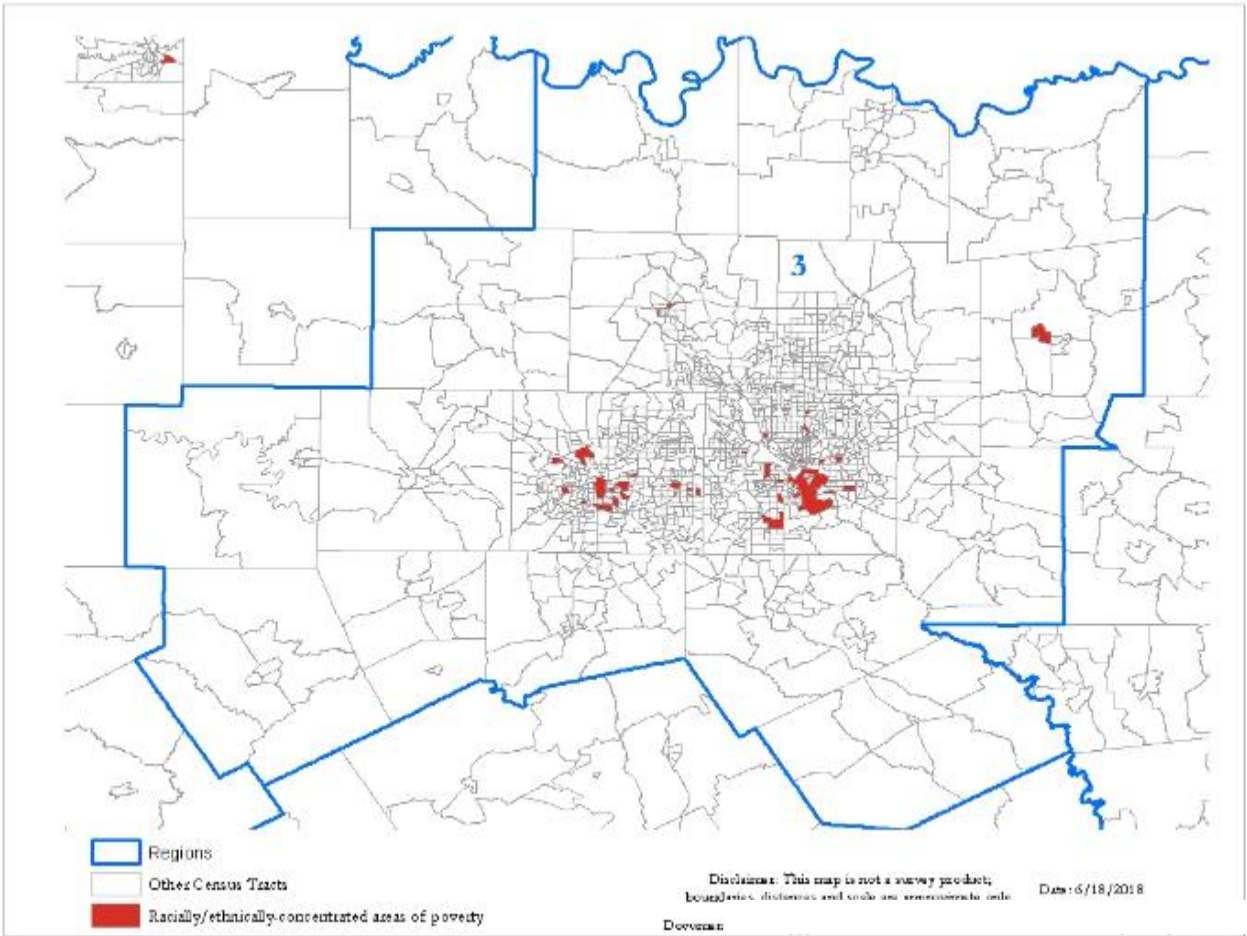


Figure 5-63: Map of R/ECAPS, Denton, TX, Region 3, 2018

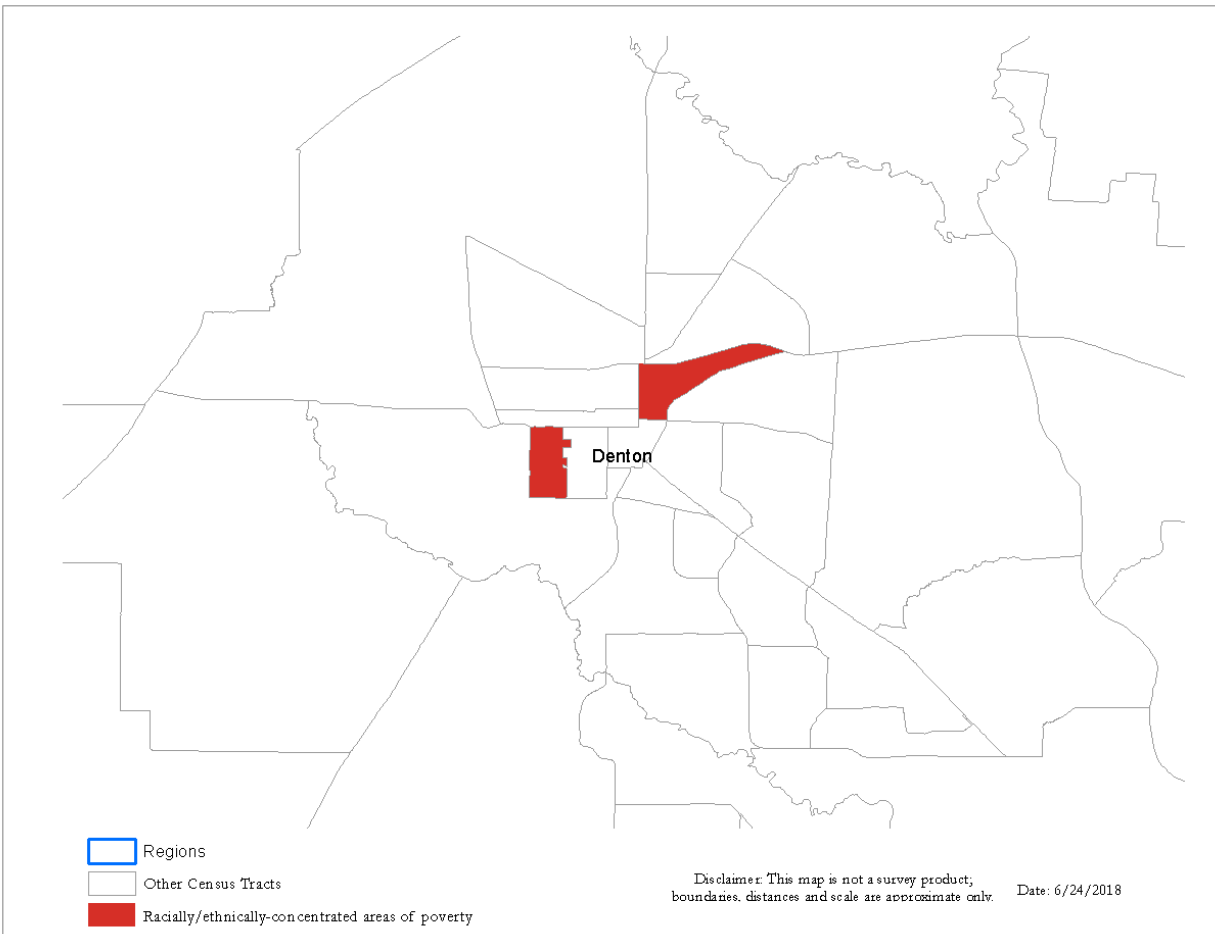




Figure 5-64: Map of R/ECAPS, Greenville, TX, Region 3, 2018

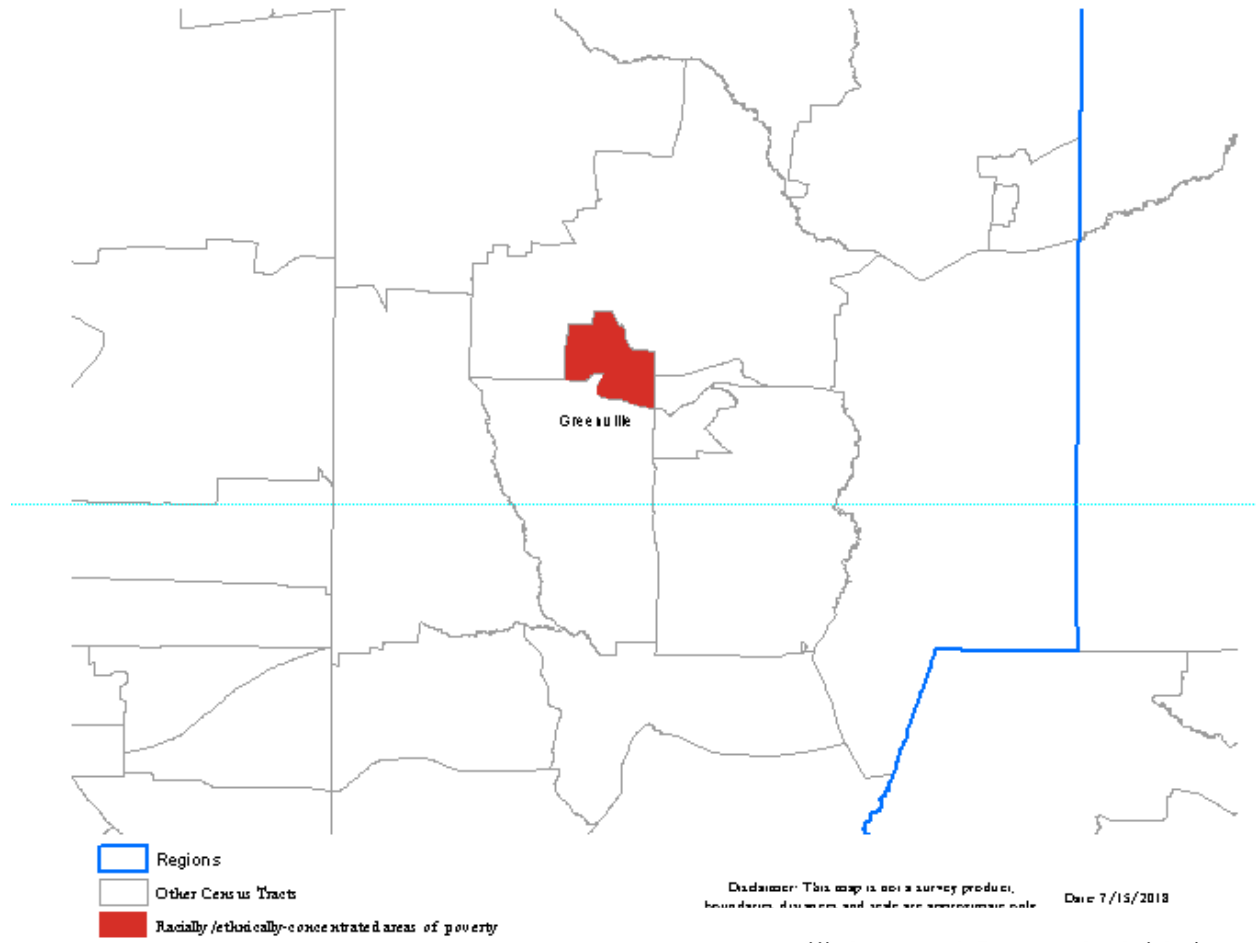
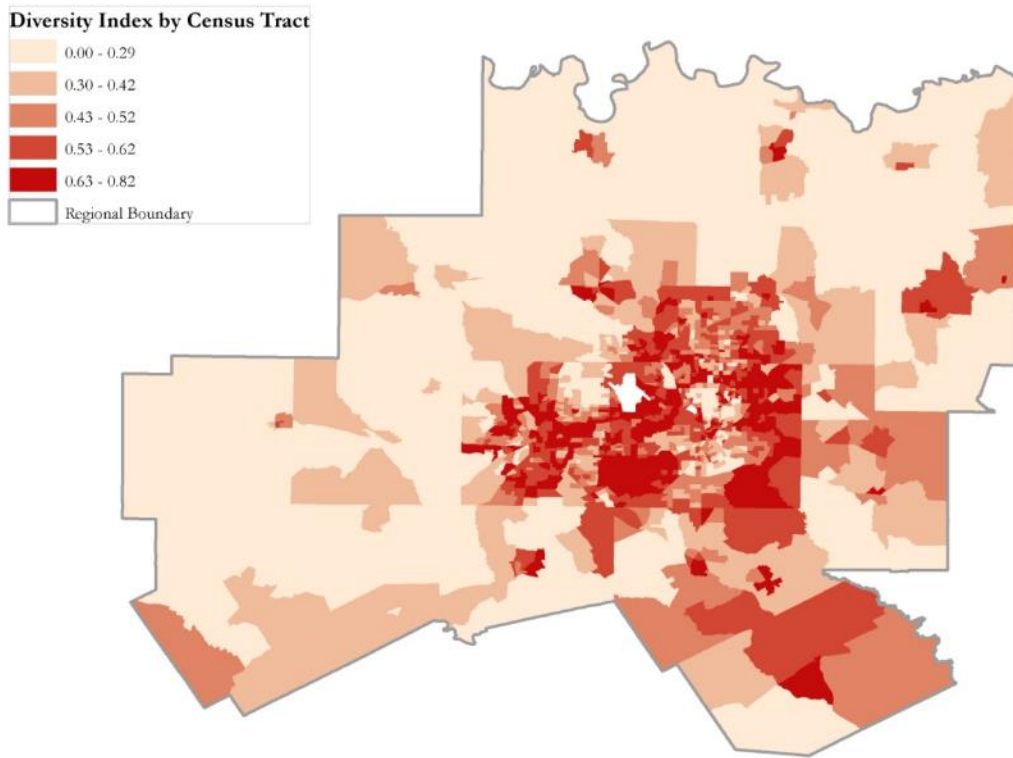


Figure 5-65 shows the Diversity Index by census tract for Region 3. Census tracts for which no data were available are shown in white.

**Figure 5-65: Diversity Index, Region 3, 2018**



R/ECAPs in Region 3 are spread throughout the urban centers of Dallas and Fort Worth, as well as in central Denton and Greenville. R/ECAPs in Dallas are primarily in the southeastern part of the city. The Diversity Index map indicates that the urban centers of Dallas and Fort Worth are more diverse, which is consistent with the definition of a R/ECAP and the Region 3 R/ECAP maps. The northwestern portion of Region 3 has a lower diversity index compared to the southeastern area of the region, suggesting less equitable distribution of diversity in the northwest. Detailed tables of the diversity index by census tract can be found in Appendix E

### **Household Characteristics**

Figure 5-66 shows the household characteristics of Region 3 households.

**Figure 5-66: Household and Family Characteristics, Region 3, 2012 to 2016**

	Texas	Region 3
Total Households	9,289,554	2,567,264
Average Household Size	2.84	2.79
Percent of Households with a Minor	37.6%	38.4%
Total Family Households	6,405,049	1,782,164
Average Family Household Size	3.44	3.38
Average Non-Family Household Size	1.28	1.27

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

The household characteristics of Region 3 are closely aligned with the characteristics for the state as a whole. A greater percentage of female-headed households have a minor than male-headed households, and both are greater than the percentage of total households with a minor.

### Income

Figure 5-67 displays the percentage of the regional population by household income category and race and ethnicity for Region 3. Overall, Region 3 has a slightly lower percentage of households with incomes less than or equal to 50% AMFI. More than 35% of Black or African American households have incomes less than or equal to 50% AMFI, and two in three Black or African American households have incomes less than or equal to 100% AMFI. Over 35% of Hispanic households have incomes less than or equal to 50% AMFI, and more than 70% have incomes less than or equal to 100% AMFI. Region 3 has the highest rate of Hispanic households with incomes less than or equal to 100% AMFI, and only 27.8% of Hispanic households have incomes greater than 100% AMFI.

**Figure 5-67: Household Income Category by Race and Ethnicity, Region 3, 2010 to 2014**

	Texas	Region 3	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	12.3%	8.1%	21.9%	11.5%	13.3%	8.2%	17.6%	17.1%
VLI	12.2%	11.7%	8.5%	14.6%	9.1%	11.7%	7.3%	10.7%	19.7%
LI	16.8%	16.8%	14.0%	19.0%	12.2%	14.0%	16.7%	17.8%	24.2%
MI	9.5%	9.7%	9.1%	10.6%	8.2%	9.6%	15.0%	9.6%	11.2%
Greater than 100 Percent AMFI	48.5%	49.5%	60.3%	33.8%	59.0%	51.4%	52.7%	44.3%	27.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

## Disability

Region 3, along with Regions 6 and 7, has the lowest rates of disability among the civilian non-institutionalized population at less than 10%. This is likely due to these regions having large Metro county populations, where rates of disability are lower. Only 9.7% of the Metro population has a disability, while 15.7% of the Non-Metro population has a disability. Figure 5-68 shows the prevalence of disability and disability types in Region 3, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. For the region as a whole and in Metro counties there is a lower rate of every type of disability compared to statewide rates.

**Figure 5-68: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 3, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	7,210,191	7,025,820	184,371
Population With a Disability	3,083,141	711,848	682,967	28,881
Percent of Population with a Disability	11.6%	9.9%	9.7%	15.7%
Percent of Population with a Hearing Difficulty	3.4%	2.7%	2.7%	4.9%
Percent of Population with a Vision Difficulty	2.5%	1.9%	1.9%	3.3%
Percent of Population with a Cognitive Difficulty	4.3%	3.7%	3.6%	5.6%
Percent of Population with an Ambulatory Difficulty	6.1%	5.1%	5.0%	8.7%
Percent of Population with a Self-Care Difficulty	2.4%	1.9%	1.9%	3.1%
Percent of Population with an Independent Living Difficulty	3.9%	3.3%	3.2%	5.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-69 shows the percent of the civilian non-institutionalized population with a disability in Region 3 by gender and age. Lower rates of disability in Region 3 compared to the state and to other regions are reflected in lower rates of disability among men, women, and children.

**Figure 5-69: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 3, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Percent of Population with a Disability	11.6%	9.9%	9.7%	15.7%
Percent of Males with a Disability	11.5%	9.6%	9.4%	16.0%
Percent of Female with a Disability	11.8%	10.2%	10.0%	15.3%
Percent of Minors With a Disability	4.2%	3.5%	3.4%	5.6%
Percent of Children Under Age 5 with a Disability	0.8%	0.7%	0.7%	0.8%
Percent of Children Aged 5-17 with a Disability	5.5%	4.5%	4.4%	7.5%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-70 shows the percent of civilian non-institutionalized population with a disability in Region 3 by race and ethnicity. Lower rates of disability across almost all races and ethnicities is consistent with the lower overall rate of disability in Region 3 compared to the state and other

regions. As with other demographics, a higher rate of disability is seen in Non-Metro counties across almost all races and ethnicities.

**Figure 5-70: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 3, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	9.9%	9.7%	15.7%
White	11.9%	10.1%	9.9%	15.7%
Black or African American	13.4%	12.0%	11.9%	20.0%
American Indian and Alaskan Native	15.8%	13.7%	13.8%	12.7%
Asian	5.7%	5.2%	5.2%	7.2%
Hawaiian and Other Pacific Islander	8.5%	9.7%	10.2%	5.0%
Some Other Race	9.2%	6.3%	6.2%	12.6%
Two or More Races	11.1%	9.3%	9.2%	13.2%
Hispanic or Latino	9.5%	5.9%	5.9%	7.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

Region 3 has lower rates of poverty than the state. Figure 5-71 shows the prevalence of poverty in Region 3 by poverty level.

**Figure 5-71: Poverty Rates by Poverty Level, Region 3, 2012 to 2016**

	Texas	Region 3
Total Population for Whom Poverty Status is Determined	26,334,005	7,171,038
Below 100% Poverty (Overall Poverty Rate)	16.7%	14.2%
Below 50% of Poverty	7.0%	5.7%
Below 150% of Poverty	27.3%	24.0%
Below 200% of Poverty	37.2%	33.4%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-72 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 3 by age, gender and race and ethnicity. Across age, gender, and race and ethnicity, the poverty rate in Region 3 is slightly lower than statewide rates.

**Figure 5-72: Poverty Rates by Age, Gender and Race/Ethnicity, Region 3, 2012 to 2016**

	<b>Texas</b>	<b>Region 3</b>
Total Population for Whom Poverty Status is Determined	26,334,005	7,171,038
Below 100% Poverty (Overall Poverty Rate)	16.7%	14.2%
Metro County	16.4%	14.1%
Non-Metro County	18.7%	19.0%
Under 18	23.9%	20.4%
Male	15.2%	12.9%
Female	18.2%	15.4%
White	15.5%	12.2%
Black or African American	22.6%	21.7%
American Indian and Alaskan Native	21.2%	16.7%
Asian	11.1%	10.3%
Hawaiian and Other Pacific Islander	14.0%	11.2%
Some Other Race	24.4%	23.4%
Two or More Races	17.2%	15.7%
Hispanic or Latino	24.2%	22.4%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-73 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Dallas-Fort Worth-Arlington, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. An equal share of job holders working in the Dallas-Fort Worth-Arlington CBSA drive less than 10 miles and between 10 to 24 miles to work, this may be due to the Dallas-Fort Worth-Arlington CBSA having such a large area.

**Figure 5-73: Share of Job Counts by Distance between Work Census Block and Home Census Block, Dallas-Fort Worth-Arlington CBSA, TX, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	3,372,034	100.0%
Less than 10 miles	1,277,443	37.9%
10 to 24 miles	1,243,606	36.9%
25 to 50 miles	424,532	12.6%
Greater than 50 miles	426,453	12.6%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-74 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Sherman-Denison, TX CBSA. Job holders working in the Sherman-Denison CBSA have a wider distribution of distance traveled to work than in the Dallas-Fort Worth-Arlington CBSA, with twice the percentage of the population commuting more than 50 miles to work. This may be due to people from surrounding communities, including from other states, commuting into the CBSA for work.

**Figure 5-74: Share of Job Counts by Distance between Work Census Block and Home Census Block, Sherman-Denison CBSA, 2015**

	Count	Share
Total All Jobs	44,034	100.0%
Less than 10 miles	18,097	41.1%
10 to 24 miles	8,770	19.9%
25 to 50 miles	6,444	14.6%
Greater than 50 miles	10,723	24.4%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-75 shows the employment and living situation of individuals in each county of Region 3.

**Figure 5-75: Employment and Living Situations, Counties in Region 3, 2015**

County	Lived Outside of County, Worked in County	Lived and Worked in County	Lived in County, Worked Outside of County	Percent that Lived in County and Worked Outside of County
Collin	224,562	168,091	268,579	61.5%
Cooke	8,541	6,903	8,342	54.7%
Dallas	842,608	778,541	334,170	30.0%
Denton	121,298	100,606	283,501	73.8%
Ellis	24,880	21,414	54,329	71.7%
Erath	6,034	7,880	8,631	52.3%
Fannin	2,919	3,634	9,173	71.6%
Grayson	20,085	23,949	24,322	50.4%
Hood	8,631	7,189	15,478	68.3%
Hunt	15,015	13,398	21,837	62.0%
Johnson	25,828	18,887	50,585	72.8%
Kaufman	16,815	10,262	41,938	80.3%
Navarro	7,710	8,160	12,042	59.6%
Palo Pinto	3,749	3,724	5,872	61.2%
Parker	19,545	14,631	38,151	72.3%
Rockwall	18,567	7,274	34,540	82.6%
Somervell	2,889	1,038	2,190	67.8%
Tarrant	358,125	530,276	357,079	40.2%
Wise	12,910	8,754	14,907	63.0%
Total	1,740,711	1,734,611	1,585,666	47.8%

Source: On the map data, 2015, with out of state employment data excluded.

Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There

## Regional Analysis

is a high degree of mobility in and out of counties in Region 3, with about the same number of job holders commuting to other counties for work as job holders that work and reside in the same county. Jobs in the region are heavily concentrated in the Dallas-Fort Worth-Arlington CBSA, as evidenced by the nearly 850,000 individuals who commute into Dallas County (Dallas) and the further 360,000 that commute into Tarrant County (Fort Worth) for their jobs.

Figure 5-76 shows the mean travel time to work for counties in Region 3. Average commute times in Region 3 are higher than in most regions, with many over 30 minutes. This may be due to the fact that a majority of counties in the region are Metro counties and are more densely populated. Kaufman County and Hood County have the longest mean commute times at 33.8 and 32.9 minutes respectively. This is likely due to job holders commuting into the Dallas-Fort Worth area for work.

**Figure 5-76: Mean Travel Time to Work, Counties in Region 3, 2012 to 2016**

County	Mean travel time to work (minutes)
Collin	28.4
Cooke	24.4
Dallas	26.9
Denton	28.8
Ellis	29
Erath	19.5
Fannin	29.6
Grayson	24.7
Hood	32.9
Hunt	30.6
Johnson	30
Kaufman	33.8
Navarro	25
Palo Pinto	23.5
Parker	31.8
Rockwall	33
Somervell	28.2
Tarrant	26.9
Wise	31.2

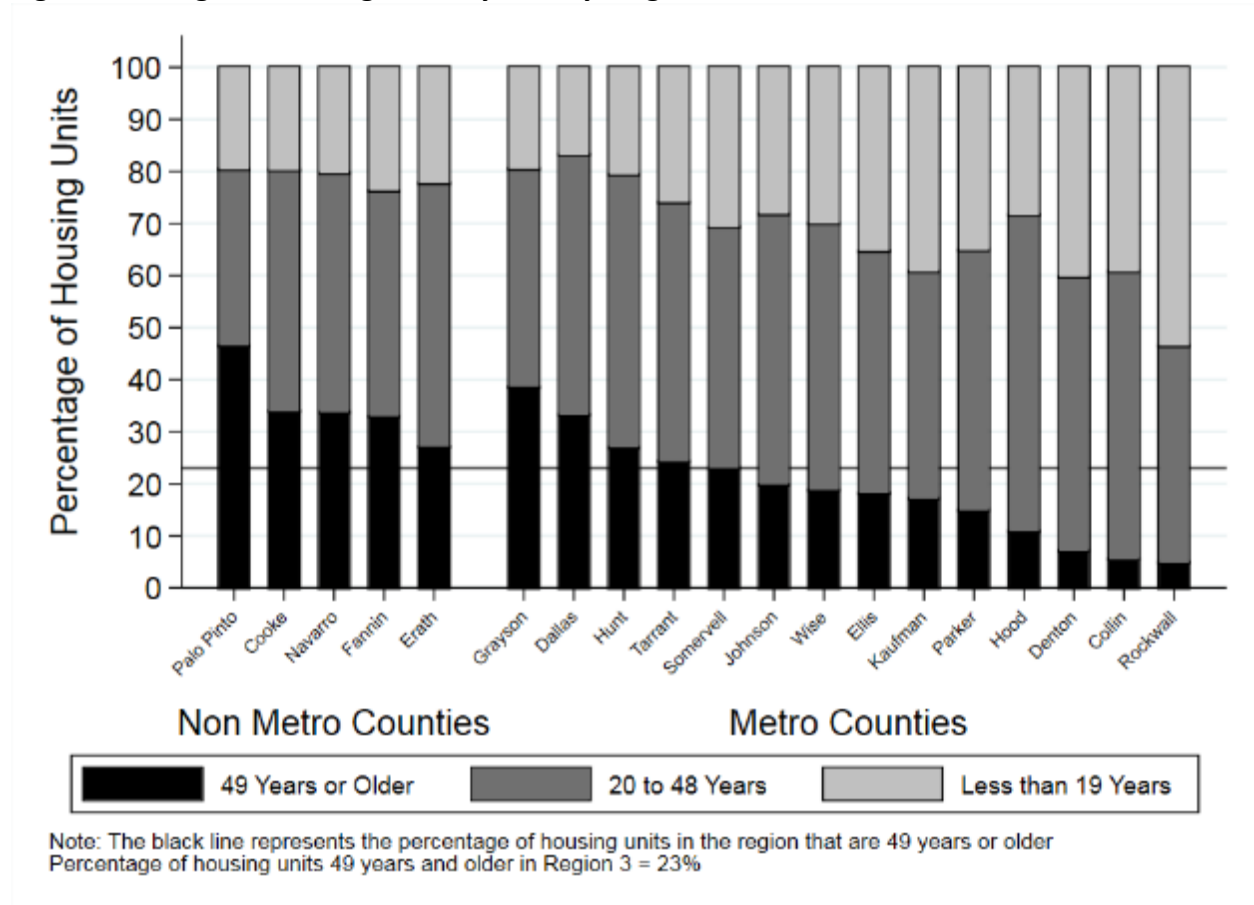
Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.



### Housing Profile

Figure 5-77 shows the average age of housing stock by county in Region 3 as a percentage of the total housing stock.

**Figure 5-77: Age of Housing Stock by County, Region 3, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Unlike TDHCA Service Regions 1 and 2, most of the housing stock in Region 3 is less than 49 years old, with some counties having 33% or more of their housing stock less than 19 years old. Figure 5-78 shows the data visually represented in Figure 5-77 in table form. Figure 5-79 shows households in Region 3 experiencing one or more housing problems.

**Figure 5-78: Age of Housing Stock by County, Region 3, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Collin	5.5%	55.2%	39.3%
Cooke	33.9%	46.3%	19.8%
Dallas	33.2%	50.0%	16.8%
Denton	7.1%	52.6%	40.3%
Ellis	18.2%	46.5%	35.3%
Erath	27.1%	50.6%	22.3%
Fannin	32.9%	43.4%	23.7%
Grayson	38.6%	41.9%	19.5%
Hood	10.8%	60.8%	28.4%
Hunt	26.9%	52.4%	20.6%
Johnson	19.8%	52.0%	28.2%
Kaufman	17.1%	43.6%	39.3%
Navarro	33.7%	45.9%	20.3%
Palo Pinto	46.5%	33.8%	19.7%
Parker	14.9%	50.0%	35.2%
Rockwall	4.9%	41.6%	53.5%
Somervell	23.0%	46.3%	30.8%
Tarrant	24.3%	49.8%	25.9%
Wise	18.8%	51.2%	30.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

**Figure 5-79: Percent of Households with One or More Housing Problems, Region 3, 2010 to 2014**

Households with One or More Housing Problems	Metro	Non-Metro	Region 3 Total	State Total
ELI Renter Households	82.0%	77.3%	81.9%	79.4%
VLI Renter Households	85.7%	67.1%	85.3%	82.7%
LI Renter Households	51.1%	48.2%	51.1%	52.1%
MI Renter Households	22.5%	20.7%	22.4%	24.2%
Renter Households with Incomes Greater than 100% AMFI	7.7%	9.1%	7.7%	8.5%
Percent Total Renter Households	48.1%	46.7%	48.1%	48.2%
ELI Owner Households	76.9%	75.0%	76.9%	73.6%
VLI Owner Households	64.0%	51.5%	63.5%	57.2%
LI Owner Households	47.9%	33.4%	47.4%	42.8%
MI Owner Households	31.8%	23.0%	31.5%	29.0%
Owner Households with Incomes Greater than 100% AMFI	9.3%	8.1%	9.3%	9.1%
Percent Total Owner Households	25.4%	22.4%	25.3%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

## Regional Analysis

Households with incomes greater than 100% AMFI are substantially less likely to experience any type of housing problem, while most households with incomes less than or equal to 50% AMFI tend to experience at least one housing problem. Region 3 has the highest rate of Non-Metro renter households experiencing at least one housing problem among all regions. ELI and VLI owner households in Region 3 are only second to Region 7 for rates of experiencing housing problems, and ELI and VLI renter households are third and second respectively. Figure 5-80 shows renter and owner households in Region 3 that lack complete plumbing and/or kitchen facilities.

**Figure 5-80: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 3, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 3 Total</b>	<b>State Total</b>
ELI Renter Households	2.3%	2.6%	2.3%	2.7%
VLI Renter Households	1.9%	6.4%	2.0%	2.3%
LI Renter Households	1.7%	1.9%	1.7%	1.8%
MI Renter Households	1.3%	1.8%	1.3%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.0%	1.6%	1.0%	1.2%
Percent Total Renter Households	1.6%	2.8%	1.6%	1.9%
ELI Owner Households	1.6%	2.6%	1.7%	2.6%
VLI Owner Households	0.8%	2.1%	0.9%	1.6%
LI Owner Households	0.5%	1.1%	0.6%	0.8%
MI Owner Households	0.6%	0.9%	0.6%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.3%	1.1%	0.4%	0.4%
Percent Total Owner Households	0.5%	1.3%	0.5%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Region 3 has a high rate of VLI renter households and owner households with incomes greater than 100% AMFI in Non-Metro counties lacking plumbing and/or kitchen facilities compared to other regions. Non-Metro households in Region 3 have higher rates than Metro households in general. Overall, Region 3 has low rates of households in all income categories lacking plumbing or kitchen facilities compared to the rest of the state.

## Regional Analysis

Figure 5-81 shows renter and owner households in Region 3 that are cost burdened.

**Figure 5-81: Percent of Households Experiencing Cost Burden, Region 3, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 3 Total</b>	<b>State Total</b>
ELI Renter Households	80.6%	76.0%	80.4%	77.3%
VLI Renter Households	80.7%	61.5%	80.2%	78.1%
LI Renter Households	43.3%	43.6%	43.3%	44.5%
MI Renter Households	15.8%	12.5%	15.7%	17.0%
Renter Households with Incomes Greater than 100% AMFI	4.0%	2.0%	4.0%	4.0%
Percent Total Renter Households	43.4%	41.7%	43.4%	43.3%
ELI Owner Households	75.4%	73.5%	75.3%	70.9%
VLI Owner Households	60.6%	46.9%	60.1%	52.8%
LI Owner Households	42.8%	28.7%	42.3%	37.5%
MI Owner Households	27.8%	19.1%	27.5%	24.3%
Owner Households with Incomes Greater than 100% AMFI	7.9%	5.1%	7.8%	6.9%
Percent Total Owner Households	23.1%	19.0%	23.0%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Region 3 has high rates of cost burden for ELI and VLI households. Four out of 5 renter households with incomes at or below 50% AMFI are cost burdened, while more than 3 in 5 owner households in the same income category are cost burdened. Rates of cost burden for owner households with incomes greater than 50% AMFI are also higher than the majority of rates for other regions. Region 3 is one of six regions where a majority of VLI owner households experience cost burden and has the second highest rate of VLI owner cost burden behind Region 7. Compared to other regions with high levels of owner cost burden, renter cost burden is not as significant in Region 3. Figure 5-82 shows renter and owner households in Region 3 that are overcrowded.

**Figure 5-82: Percent of Households Experiencing Overcrowding, Region 3, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 3 Total</b>	<b>State Total</b>
ELI Renter Households	10.3%	4.9%	10.2%	10.0%
VLI Renter Households	11.3%	7.5%	11.2%	10.7%
LI Renter Households	8.0%	3.9%	8.0%	7.9%
MI Renter Households	5.8%	6.2%	5.8%	6.2%
Renter Households with Incomes Greater than 100% AMFI	2.9%	5.5%	2.9%	3.6%
Percent Total Renter Households	7.4%	5.5%	7.3%	7.5%
ELI Owner Households	4.6%	7.6%	4.7%	5.5%
VLI Owner Households	6.0%	4.1%	5.9%	6.1%
LI Owner Households	5.7%	4.3%	5.7%	5.8%
MI Owner Households	3.8%	3.1%	3.8%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.1%	2.0%	1.2%	1.8%
Percent Total Owner Households Overcrowded	2.6%	3.1%	2.6%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Region 3 has a particularly high rate of overcrowding for ELI owner households in Non-Metro counties—7.6% of ELI Non-Metro owner households in Region 3 experience overcrowding, second only to Region 11 at 9.1%, which has the highest rates of overcrowding across household types. Overall, households with incomes less than or equal to 100% AMFI have higher rates of overcrowding in Region 3 compared to other regions, but households with incomes greater than 100% AMFI have very low rates of overcrowding. ELI, VLI, and LI renter households in Metro counties have higher rates of overcrowding than those in Non-Metro counties, while the reverse is true for renter households with incomes greater than 80% AMFI. ELI owner households experience overcrowding at higher rates in Non-Metro counties, but VLI, LI, and MI owner households have higher rates in Metro counties. Figure 5-83 shows the average housing costs in Region 3.

**Figure 5-83: Average Housing Cost, Region 3, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$1,202
Average Monthly Rent	\$885

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Unlike Regions 1 and 2, the Metroplex has significantly higher costs of housing, especially for homeowners with a mortgage, who have costs that are more than twice that of Region 2. Figure 5-84 shows the number of bedrooms in renter and owner occupied housing units in Region 3.

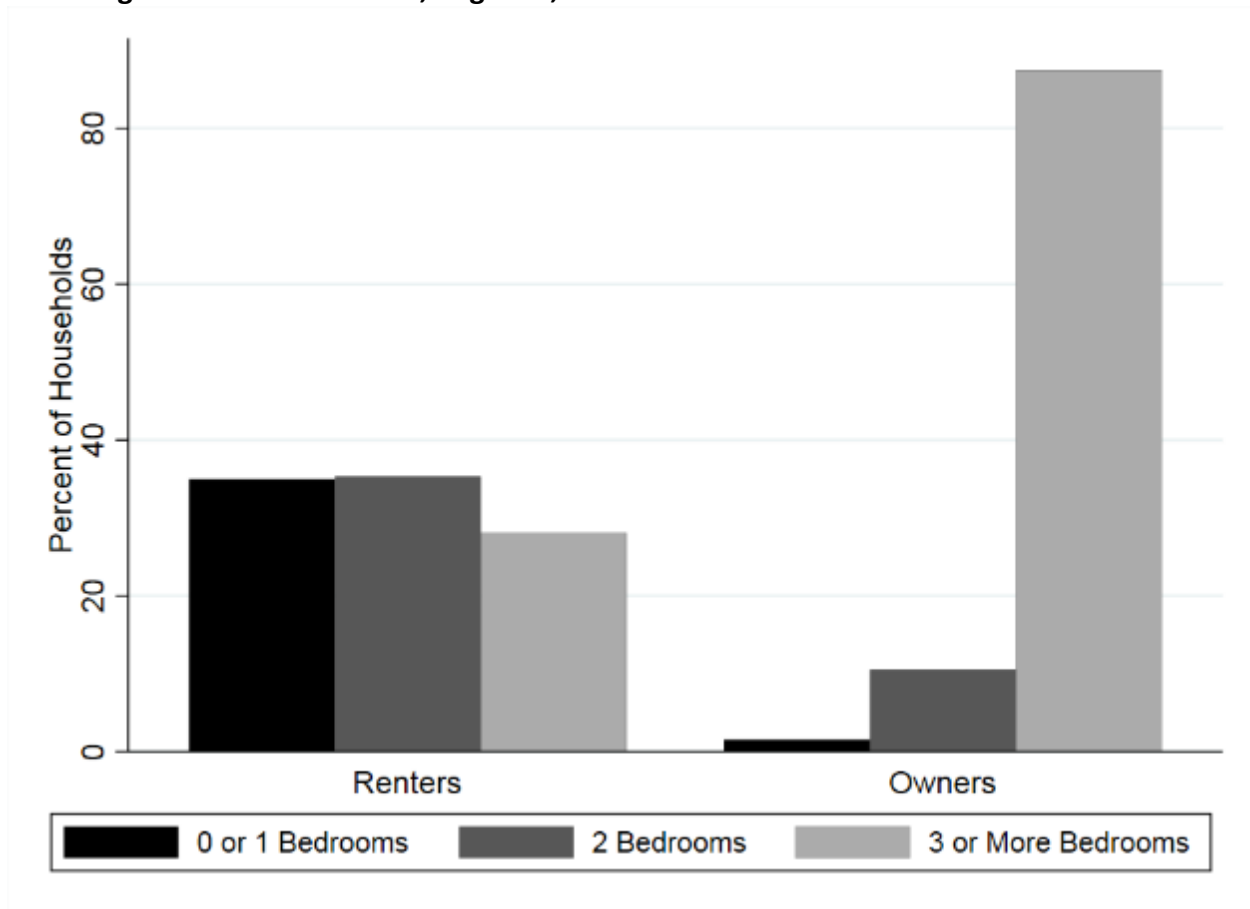
**Figure 5-84: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 3, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	952,720	35.6%	35.9%	28.6%
Owner Occupied	1,509,381	1.5%	10.6%	87.9%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-85 is a visual representation of the regional data from Figure 5-84.

**Figure 5-85: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 3, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Region 3 has the highest percentage of renter occupied units with 0 or 1 bedrooms. This explains why, despite having the lowest percentage of owner occupied units with 0 or 1 bedrooms, nearly 15% of all households in Region 3 have 0 or 1 bedrooms, the third highest share of total 0 or 1

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bedroom units among all regions. Region 3 also has the third lowest percentage of renter units with 3 or more bedrooms and the highest percentage of owner units with 3 or more bedrooms among all regions, which might explain the difference between owner and renter overcrowding.

Figure 5-86 maps the active multifamily properties in Region 3 participating in TDHCA programs.

**Figure 5-86: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 3, 2018**

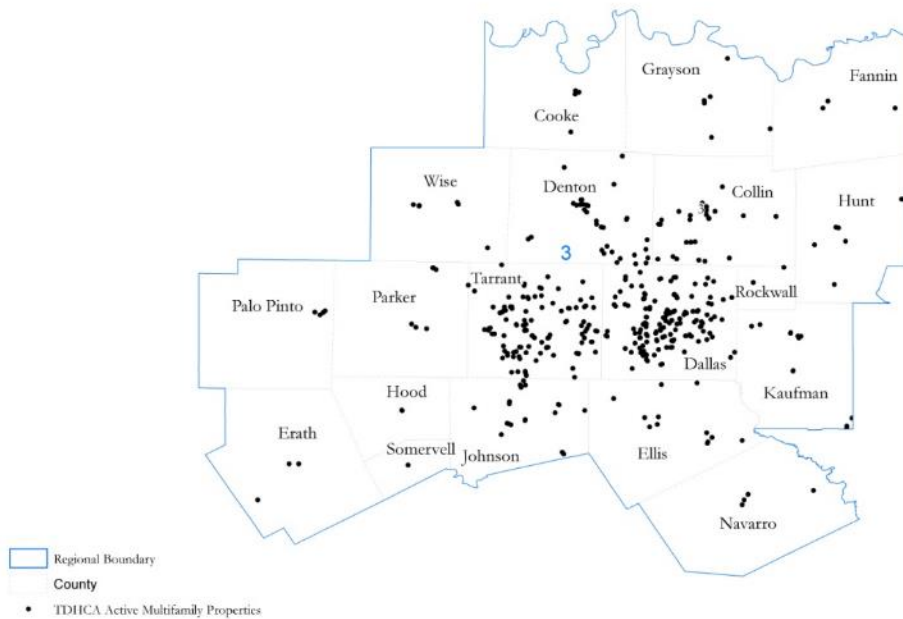


Figure 5-87 shows the number of multifamily properties participating in TDHCA programs by county in Region 3.

**Figure 5-87: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 3, 2018**

County	Active Property Count	Active Property Unit Count	Active Property Program Unit Count
Collin	34	5,282	4,401
Cooke	4	304	296
Dallas	176	30,631	28,736
Denton	42	6,075	5,494
Ellis	16	1,634	1,599
Erath	4	230	230
Fannin	3	97	97
Grayson	10	1,096	975
Hood	5	121	121
Hunt	7	774	595
Johnson	20	1,818	1,609
Kaufman	14	1,114	1,013
Navarro	4	184	170
Palo Pinto	4	267	267
Parker	7	446	446
Rockwall	3	393	313
Somervell	1	20	20
Tarrant	129	22,127	20,774
Wise	9	294	265
<b>Total</b>	<b>492</b>	<b>72,907</b>	<b>67,421</b>

Source: TDHCA, Central Database, data pull from June 2018.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county. There is a heavy concentration of TDHCA units in the four most populous central counties of Region 3: Dallas County, Tarrant County, Denton County, and Collin County.



## Region 4—“Upper East Texas”

**Point of Reference Cities:** Tyler, Longview, Texarkana

### Geo-Demographic Background

The northeast corner of Texas is home to the East Texas Oil Field, which is the largest and most prolific oil reservoir in the contiguous United States. The area also includes abundant portions of the East Texas Timberlands Region, with significant harvesting of pinewood and hardwood. Beef cattle, horses, hay, and nursery crops are among the main agricultural products in the area, and oil and gas extraction firms, educational and medical facilities, and retail shops employ many of the workers.

The region’s largest city is Tyler, which began as a railroad depot for the cotton trade. The region saw a boom with the discovery of oil in the 20<sup>th</sup> century, bringing more people, businesses, and development to the area. Tyler has become a medical center for the region. Roses are a quite lucrative product in Tyler as both a money crop and a tourist attraction. Figure 5-88 shows the counties of TDHCA Region 4.

**Figure 5-88: State of Texas’ Region 4 Counties**

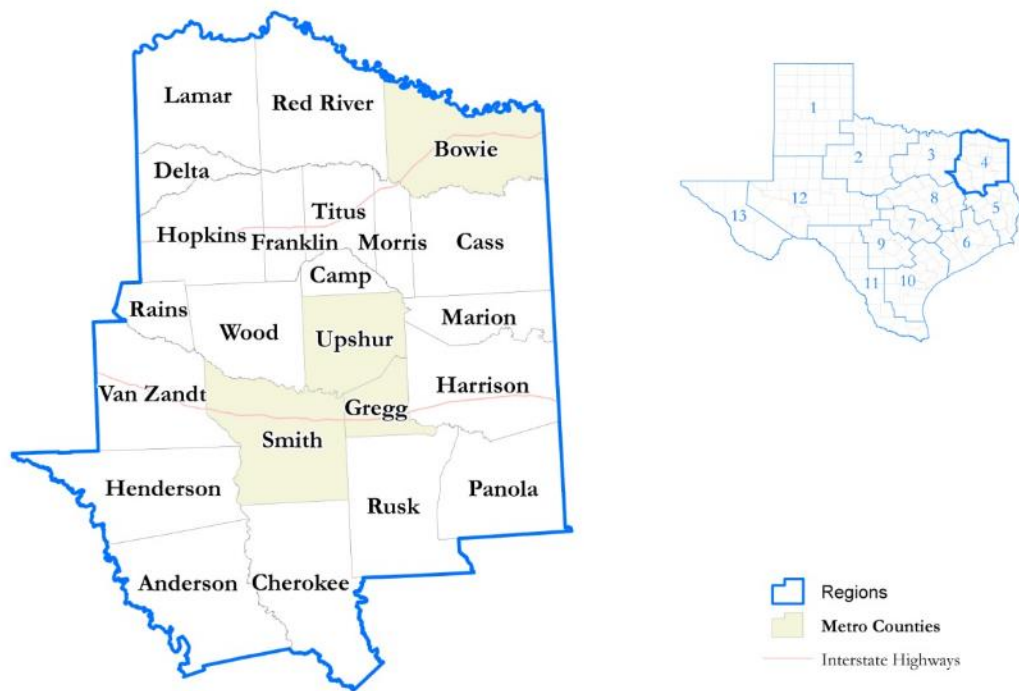


Figure 5-89 displays the population projections of Texas by race and ethnicity as a percentage of the population of Region 4 from 2010 through 2050.

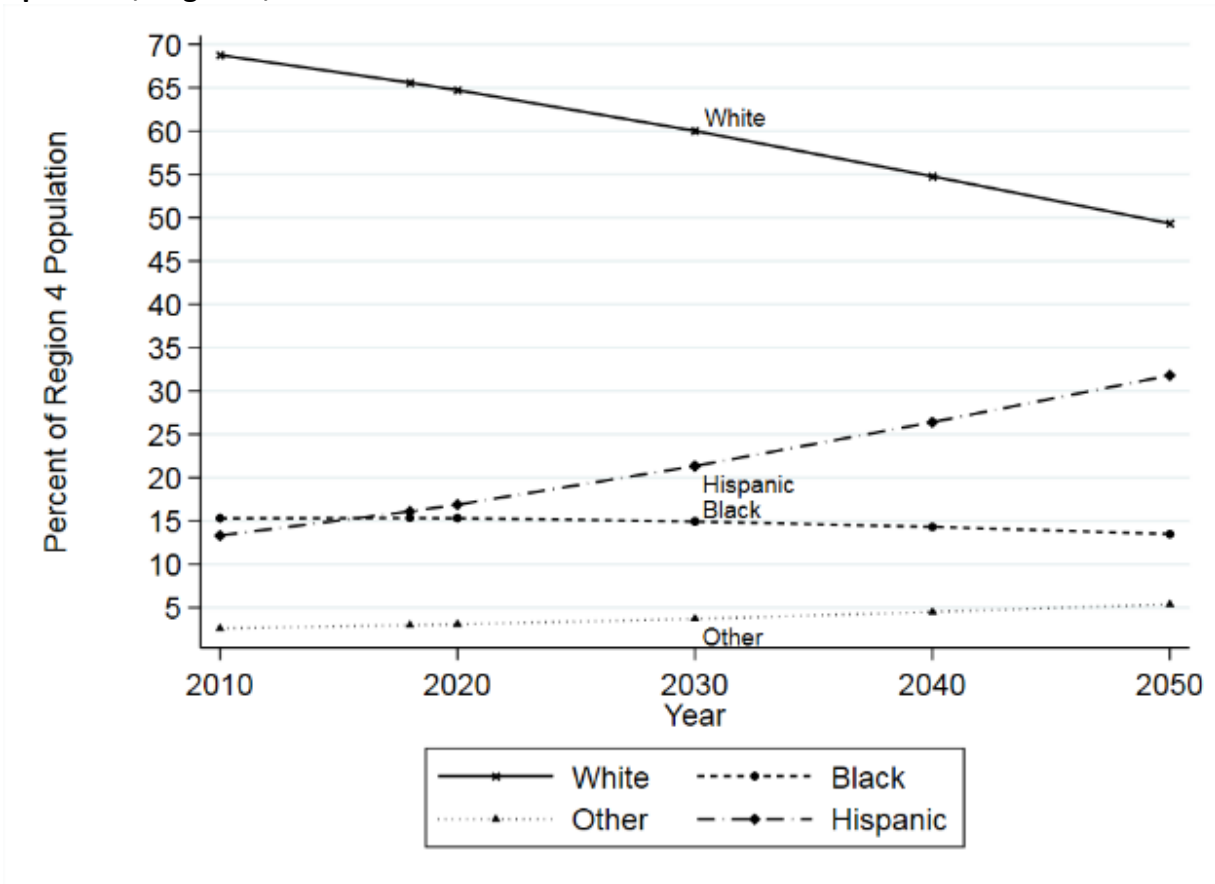
**Figure 5-89: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 4, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	68.8%	15.3%	2.6%	13.3%	1,111,696
2018	65.6%	15.4%	3.0%	16.1%	1,177,087
2020	64.7%	15.3%	3.1%	16.9%	1,193,621
2030	60.0%	14.9%	3.7%	21.3%	1,275,288
2040	54.8%	14.3%	4.5%	26.4%	1,347,107
2050	49.3%	13.5%	5.4%	31.8%	1,426,588

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 4 is projected to not experience demographic change for longer than most other regions, remaining majority white for nearly the entire 3 decade span covered by the population projections. Furthermore, the region is not projected to experience the same rapid growth of its Hispanic population that the rest of the state is likely to experience for at least a decade. During this time frame, the region is expected to only minimally increase its total population. Figure 5-90 is a visual representation of Figure 5-89.

**Figure 5-90: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 4, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 5-91 shows the R/ECAPs in Region 4. Figure 5-92, Figure 5-93, and Figure 5-94 show R/ECAPs in Paris, the Tyler-Jacksonville-Palestine area, and in Texarkana respectively. A list of the census tracts designated as R/ECAPS is available in Appendix D as well.

**Figure 5-91: Map of R/ECAPS, Region 4, 2018**

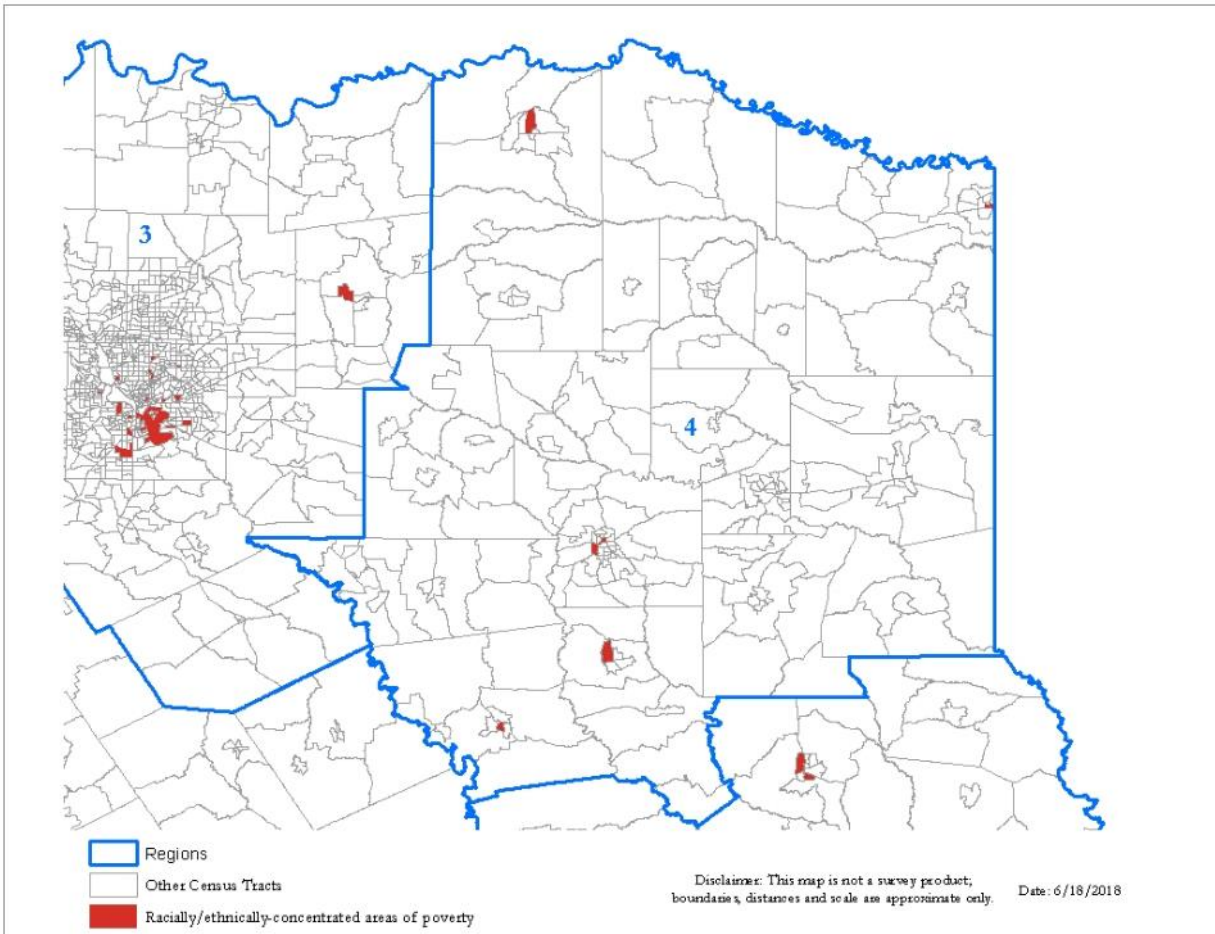
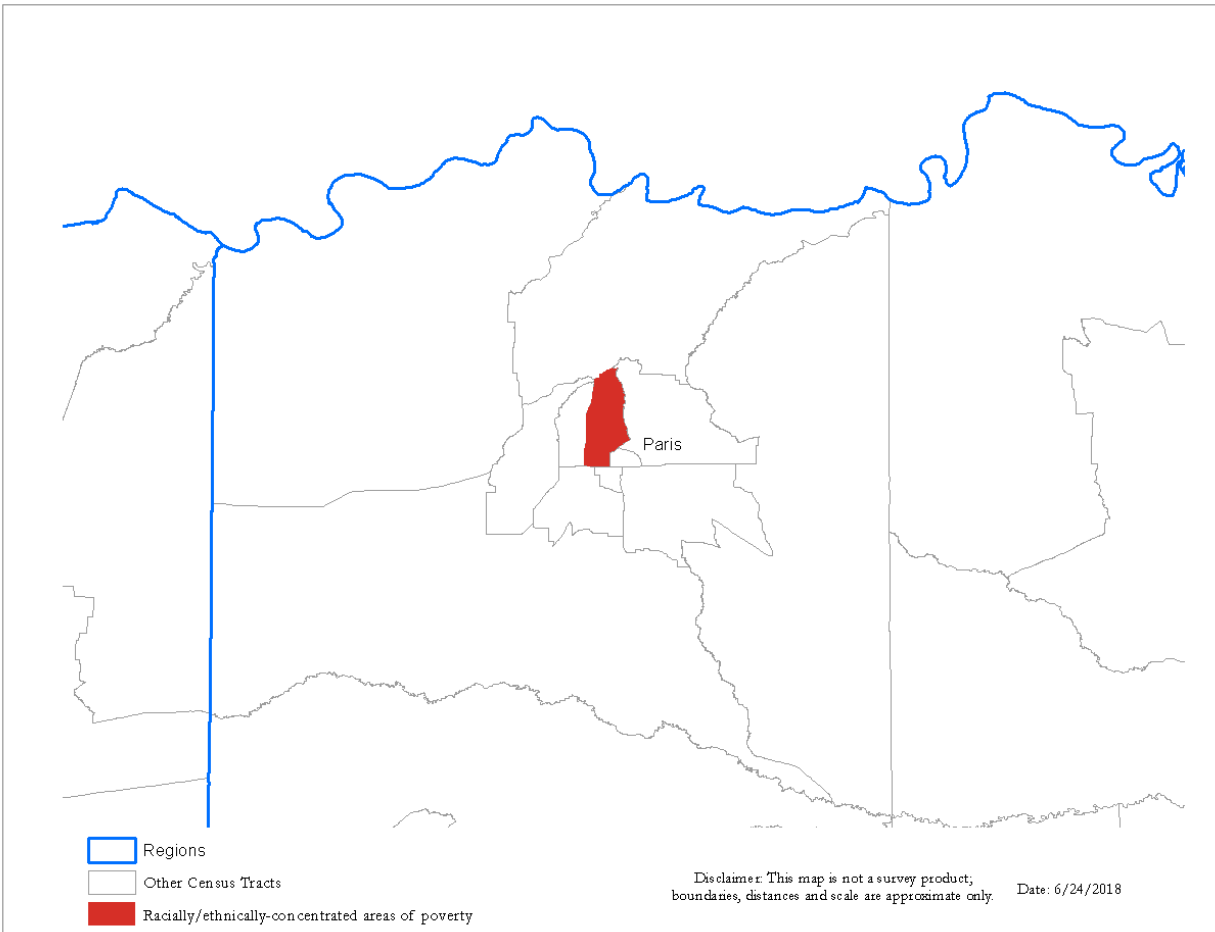


Figure 5-92: Map of R/ECAPS, Paris, TX, Region 4, 2018



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**Figure 5-93: Map of R/ECAPS, Tyler, Jacksonville and Palestine, TX, Region 4, 2018**

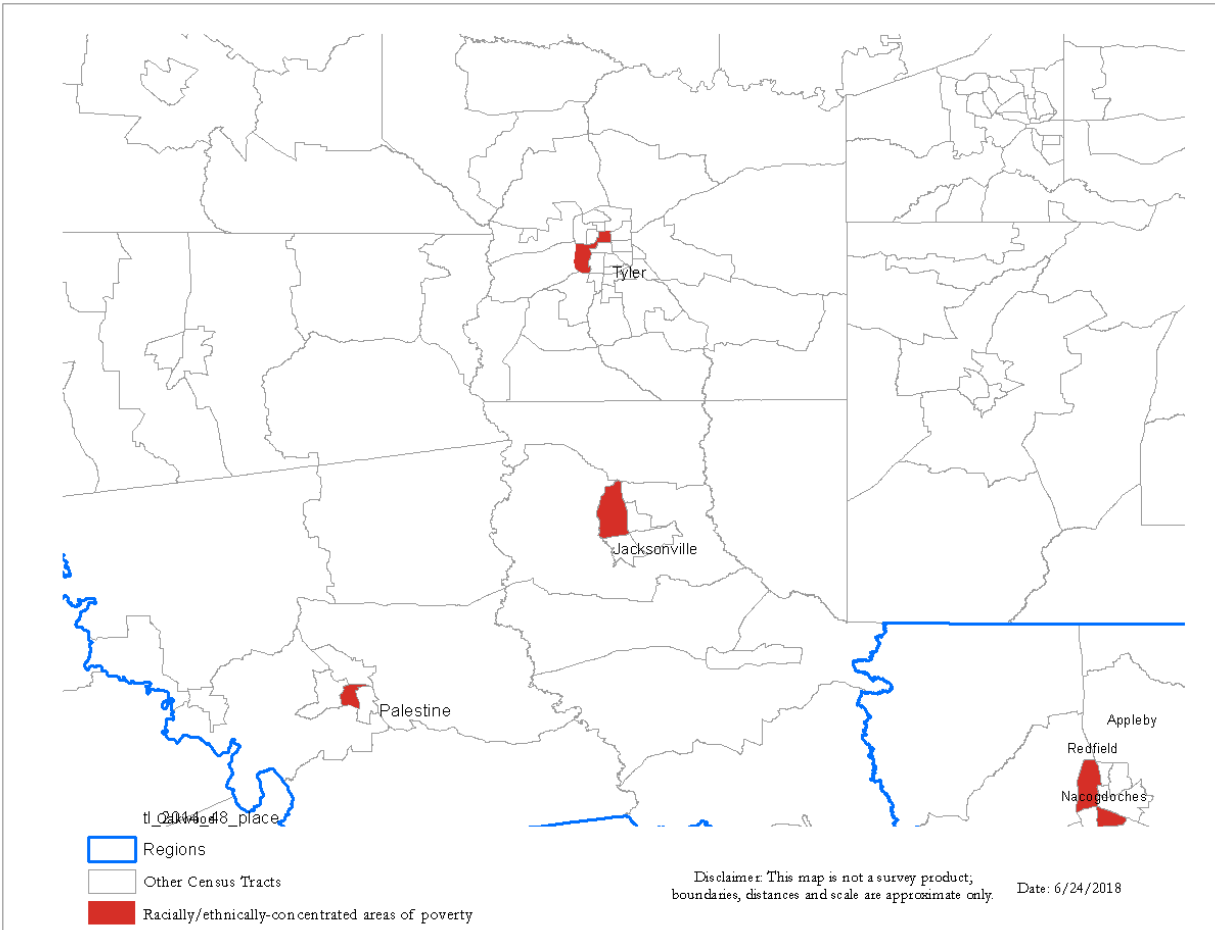


Figure 5-94: Map of R/ECAPS, Texarkana, TX, Region 4, 2018

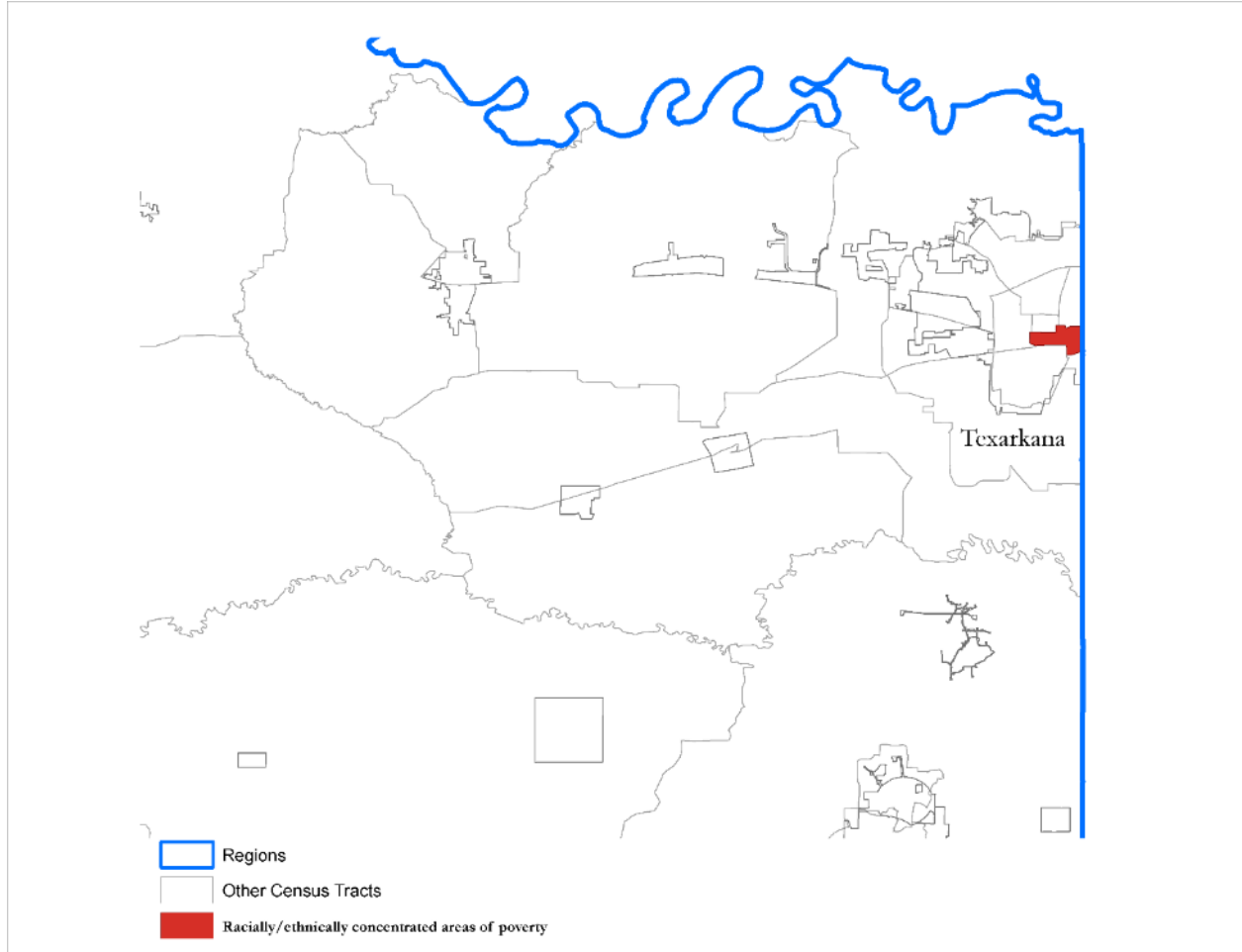
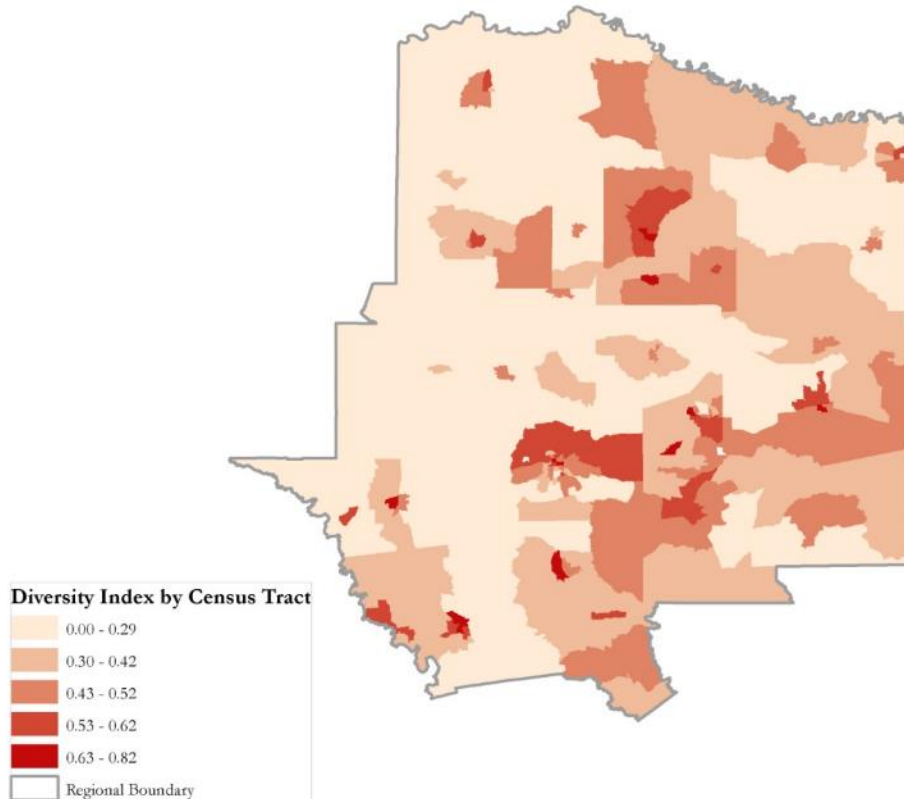


Figure 5-95 maps the Diversity Index in Region 4. Census tracts for which no data were available are shown in white.

**Figure 5-95: Diversity Index, Region 4, 2018**



R/ECAPs in Region 4 are concentrated in the city centers of the region’s smaller population centers such as Tyler, Texarkana, and Paris. These areas are small and dispersed. Areas with a high Diversity Index value, similarly to R/ECAPs, are concentrated in the center of smaller population centers spread throughout the region. Notably the area north of Tyler and the area surrounding Mount Pleasant have relatively high Diversity Index values. Detailed tables of the diversity index by census tract can be found in Appendix E

**Household Characteristics**

Figure 5-96 shows household characteristics of Region 4 households.

**Figure 5-96: Household and Family Characteristics, Region 4, 2012 to 2016**

	Texas	Region 4
Total Households	9,289,554	404,507
Average Household Size	2.84	2.68
Percent of Households with a Minor	37.6%	32.8%
Total Family Households	6,405,049	282,598
Average Family Household Size	3.44	3.23
Average Non-Family Household Size	1.28	1.22

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Household characteristics of Region 4 resemble the state in general. The average household size for all household types and the percentage of total households with a minor and female-headed households with a minor are all below the figures for the state as a whole, while the percent of male-headed households with a minor is slightly above the state percentage. Region 4 has the lowest percent of female-headed households with a minor of all the regions.

### Income

Figure 5-97 displays the percentage of the regional population by household income category and race and ethnicity for Region 4. Overall, Region 4 aligns closely with the state’s household income category distribution by race and ethnicity, though it has a slightly smaller percentage of households that are ELI. Over 70% of Black or African American households in Region 4 have incomes less than or equal to 80% AMFI. Almost one in four Black or African American households are ELI.

**Figure 5-97: Household Income Category by Race and Ethnicity, Region 4, 2010 to 2014**

	Texas	Region 4	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	11.9%	9.2%	24.1%	13.0%	11.2%	6.2%	16.6%	14.3%
VLI	12.2%	12.9%	11.2%	18.4%	9.2%	9.7%	0.0%	12.9%	18.3%
LI	16.8%	17.1%	15.8%	19.3%	14.4%	23.8%	32.2%	16.0%	24.9%
MI	9.5%	10.1%	10.0%	9.6%	9.0%	9.7%	0.0%	11.7%	11.7%
Greater than 100 Percent AMFI	48.5%	47.9%	53.8%	28.5%	54.4%	45.5%	61.6%	42.7%	30.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.



## Disability

Of the civilian non-institutionalized population of Region 4, 15.7% has a disability, which is relatively higher than statewide rate of 11.6%. Figure 5-98 shows the prevalence of disability and disability types in Region 4, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Unlike other regions, there is not a significant difference in the rates of specific disability types between the Metro and Non-Metro counties.

**Figure 5-98: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 4, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	1,091,130	514,870	576,260
Population With a Disability	3,083,141	171,271	74,765	96,506
Percent of Population with a Disability	11.6%	15.7%	14.5%	16.7%
Percent of Population with a Hearing Difficulty	3.4%	4.7%	4.2%	5.2%
Percent of Population with a Vision Difficulty	2.5%	3.0%	2.7%	3.2%
Percent of Population with a Cognitive Difficulty	4.3%	5.6%	5.4%	5.7%
Percent of Population with an Ambulatory Difficulty	6.1%	8.8%	7.8%	9.7%
Percent of Population with a Self-Care Difficulty	2.4%	3.2%	3.1%	3.3%
Percent of Population with an Independent Living Difficulty	3.9%	5.4%	5.1%	5.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-99 shows the percent of the civilian non-institutionalized population with a disability in Region 4 by gender and age.

**Figure 5-99: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 4, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Percent of Population with a Disability	11.6%	15.7%	14.5%	16.7%
Percent of Males with a Disability	11.5%	15.8%	14.4%	17.0%
Percent of Female with a Disability	11.8%	15.6%	14.6%	16.5%
Percent of Minors With a Disability	4.2%	5.4%	5.8%	5.0%
Percent of Children Under Age 5 with a Disability	0.8%	0.8%	0.7%	0.8%
Percent of Children Aged 5-17 with a Disability	5.5%	7.1%	7.8%	6.4%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-100 shows the percent of civilian non-institutionalized population with a disability in Region 4 by race and ethnicity. Higher rates of disability across almost all races and ethnicities is consistent with the higher overall rate of disability in Region 4 compared to the state and other regions. After Region 10, Region 4 has the highest rate of American Indians and Native Alaskans with a disability.

**Figure 5-100: Percent of Civilian Non-Institutionalized Population with Disability by Race/Ethnicity, Region 4, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Population	11.6%	15.7%	14.5%	16.7%
White	11.9%	15.8%	14.2%	17.0%
Black or African American	13.4%	17.2%	17.2%	17.1%
American Indian and Alaskan Native	15.8%	25.8%	24.5%	26.8%
Asian	5.7%	6.8%	5.9%	8.5%
Hawaiian and Other Pacific Islander	8.5%	4.5%	2.6%	6.8%
Some Other Race	9.2%	7.0%	7.3%	6.8%
Two or More Races	11.1%	14.9%	10.7%	18.3%
Hispanic or Latino	9.5%	6.0%	5.4%	6.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

Region 4 has slightly higher rates of poverty than the state but overall aligns closely with state levels. Figure 5-101 shows the prevalence of poverty in Region 4 by poverty level.

**Figure 5-101: Poverty Rates by Poverty Level, Region 4, 2012 to 2016**

	<b>Texas</b>	<b>Region 4</b>
Total Population for Whom Poverty Status is Determined	26,334,005	1,082,139
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.7%
Below 50% of Poverty	7.0%	7.3%
Below 150% of Poverty	27.3%	29.6%
Below 200% of Poverty	37.2%	41.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701

Figure 5-102 shows the percent of individuals under the poverty line, or 100% of the federal poverty level, in Region 4 by age, gender, and race and ethnicity. Across age and gender, Region 4 aligns closely with the state. Compared to other regions, Region 4 has the highest rate of poverty among Black or African American individuals at 32%. After Region 7, Region 4 has the lowest rate of poverty among American Indian and Alaskan Native individuals.

**Figure 5-102: Poverty Rates by Age, Gender and Race and Ethnicity, Region 4, 2012 to 2016**

	<b>Texas</b>	<b>Region 4</b>
Total Population for Whom Poverty Status is Determined	26,334,005	1,082,139
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.7%
Metro County	16.4%	17.4%
Non-Metro County	18.7%	18.1%
Under 18	23.9%	26.5%
Male	15.2%	16.0%
Female	18.2%	19.4%
White	15.5%	14.8%
Black or African American	22.6%	32.0%
American Indian and Alaskan Native	21.2%	15.1%
Asian	11.1%	15.8%
Hawaiian and Other Pacific Islander	14.0%	6.1%
Some Other Race	24.4%	27.6%
Two or More Races	17.2%	22.6%
Hispanic or Latino	24.2%	27.9%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701

## Employment

Figure 5-103 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Longview, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 5-103: Share of Job Counts by Distance between Work Census Block and Home Census Block, Longview CBSA, TX, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	95,818	100.0%
Less than 10 miles	38,794	40.5%
10 to 24 miles	21,327	22.3%
25 to 50 miles	12,355	12.9%
Greater than 50 miles	23,342	24.4%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-104 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Texarkana, TX CBSA.

**Figure 5-104: Share of Job Counts by Distance between Work Census Block and Home Census Block, Texarkana CBSA, TX, 2015**

	Count	Share
Total All Jobs	54,565	100.0%
Less than 10 miles	29,561	54.2%
10 to 24 miles	9,829	18.0%
25 to 50 miles	4,068	7.5%
Greater than 50 miles	11,107	20.4%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-105 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Tyler, TX CBSA. Across the three CBSAs in Region 4, a majority of job holders drive less than 10 miles to work, but at least 20% of job holders are commuting greater than 50 miles to work.

**Figure 5-105: Share of Job Counts by Distance between Work Census Block and Home Census Block, Tyler, TX, 2015**

	Count	Share
Total All Jobs	101,350	100.0%
Less than 10 miles	45,429	44.8%
10 to 24 miles	19,653	19.4%
25 to 50 miles	12,068	11.9%
Greater than 50 miles	24,200	23.9%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-106 shows the employment and living situation of individuals in each county of Region 4. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There is a high degree of mobility in and out of counties in Region 4; in fact, more people commute to a different county for work than live and work in the same county. Jobs in Region 4 are most prevalent in Smith County (Tyler, TX) and Gregg County (Longview, TX). One and a half times as many people commute into Gregg County for work than those that live and work in Gregg County.

**Figure 5-106: Employment and Living Situations, Counties in Region 4, 2015**

<b>County</b>	<b>Lived Outside of County, Worked in County</b>	<b>Lived and Worked in County</b>	<b>Lived in County, Worked Outside of County</b>	<b>Percent that Lived in County and Worked Outside of County</b>
Anderson	8,268	6,428	9,706	60.2%
Bowie	17,505	20,153	9,211	31.4%
Camp	2,362	1,505	3,927	72.3%
Cass	3,365	3,537	5,176	59.4%
Cherokee	7,137	7,907	11,011	58.2%
Delta	395	205	1,543	88.3%
Franklin	2,203	724	2,259	75.7%
Gregg	45,594	30,827	20,228	39.6%
Harrison	12,135	9,590	16,648	63.4%
Henderson	6,853	8,440	17,416	67.4%
Hopkins	5,250	6,544	6,701	50.6%
Lamar	7,533	12,189	6,700	35.5%
Marion	1,118	768	3,195	80.6%
Morris	2,744	1,442	3,009	67.6%
Panola	6,034	3,783	4,889	56.4%
Rains	1,138	768	2,400	75.8%
Red River	887	1,493	2,918	66.2%
Rusk	7,187	5,724	14,542	71.8%
Smith	43,702	57,648	30,846	34.9%
Titus	7,881	7,682	5,594	42.1%
Upshur	3,547	2,939	12,754	81.3%
Van Zandt	5,229	5,207	11,931	69.6%
Wood	4,311	3,887	10,465	72.9%
<b>Total</b>	<b>202,378</b>	<b>199,390</b>	<b>213,069</b>	<b>51.7%</b>

Source: On the map data, 2015, with out of state employment data excluded.

Figure 5-107 shows the mean travel time to work for counties in Region 4. Average commute times vary widely across counties within the region, ranging from 17.6 minutes to 34.8 minutes. Region 4 experiences fairly high commute times in counties that surround the Metro counties, likely due to job holders in Non-Metro counties commuting into the job centers in Smith County (Tyler, TX), Gregg and Harrison Counties (Longview, TX), and Bowie County (Texarkana, TX).

**Figure 5-107: Mean Travel Time to Work, Counties in Region 4, 2012 to 2016**

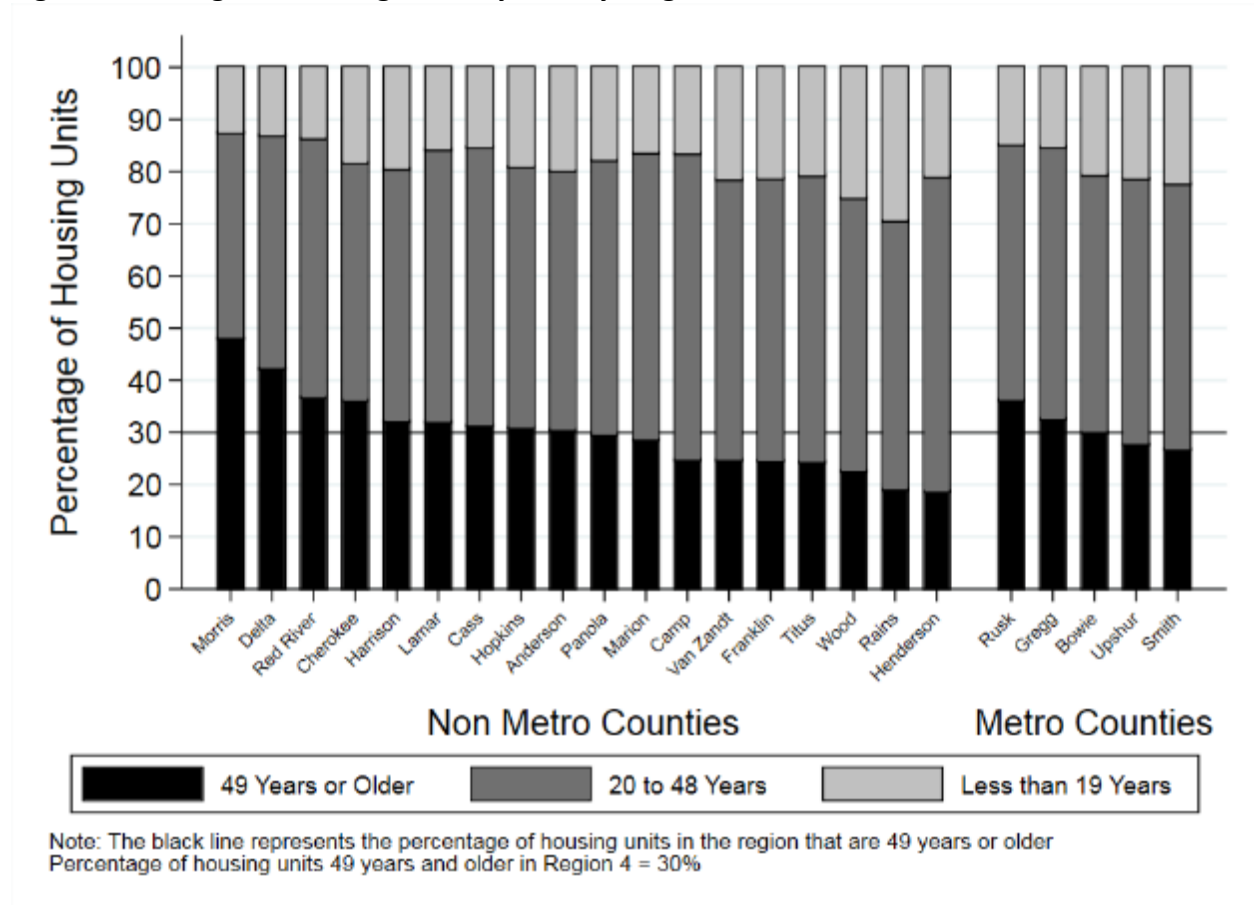
<b>County</b>	<b>Mean travel time to work (minutes)</b>
Anderson	22.7
Bowie	17.6
Camp	24.5
Cass	24.9
Cherokee	24.6
Delta	32.4
Franklin	21.9
Gregg	20.2
Harrison	21.5
Henderson	29.6
Hopkins	23
Lamar	20.4
Marion	30.5
Morris	23.2
Panola	24.2
Rains	34.8
Red River	30.8
Rusk	23.7
Smith	23.3
Titus	19
Upshur	27.6
Van Zandt	33.7
Wood	30.6

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

### Housing Profile

Figure 5-108 shows the average age of housing stock by county in Region 4 as a percentage of the total housing stock.

**Figure 5-108: Age of Housing Stock by County, Region 4, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Region 4 has a fairly uniform mix of housing unit ages. A few counties have significantly older stock, but unlike Region 1 and 2, no county’s housing units are a majority 49 or more years old. Figure 5-109 shows the data visually represented in Figure 5-108 in table form.

**Figure 5-109: Age of Housing Stock in Region 4, By County, 2012 to 2016**

<b>County</b>	<b>49 Years or Older</b>	<b>20 to 48 Years Old</b>	<b>Less than 19 Years Old</b>
Anderson	30.5%	49.7%	19.9%
Bowie	30.0%	49.3%	20.7%
Camp	24.7%	58.7%	16.6%
Cass	31.3%	53.4%	15.4%
Cherokee	36.1%	45.5%	18.3%
Delta	42.3%	44.6%	13.1%
Franklin	24.6%	54.1%	21.3%
Gregg	32.6%	52.1%	15.3%
Harrison	32.1%	48.4%	19.5%
Henderson	18.7%	60.4%	21.0%
Hopkins	30.9%	50.0%	19.1%
Lamar	32.0%	52.2%	15.8%
Marion	28.6%	55.0%	16.4%
Morris	48.1%	39.4%	12.5%
Panola	29.6%	52.6%	17.8%
Rains	19.0%	51.5%	29.4%
Red River	36.7%	49.6%	13.6%
Rusk	36.2%	49.0%	14.8%
Smith	26.7%	50.9%	22.3%
Titus	24.3%	54.9%	20.8%
Upshur	27.7%	50.9%	21.4%
Van Zandt	24.7%	53.8%	21.5%
Wood	22.6%	52.3%	25.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-110 shows households in Region 4 experiencing one or more housing problems.



**Figure 5-110: Percent of Households with One or More Housing Problems, Region 4, 2010 to 2014**

<b>Households with One or More Housing Problems</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 4 Total</b>	<b>State Total</b>
ELI Renter Households	76.3%	70.8%	73.5%	79.4%
VLI Renter Households	79.5%	68.5%	74.2%	82.7%
LI Renter Households	58.1%	43.2%	51.4%	52.1%
MI Renter Households	23.1%	22.4%	22.8%	24.2%
Renter Households with Incomes Greater than 100% AMFI	6.2%	7.3%	6.7%	8.5%
Percent Total Renter Households	47.6%	43.1%	45.5%	48.2%
ELI Owner Households	68.5%	67.6%	68.0%	73.6%
VLI Owner Households	49.3%	48.4%	48.7%	57.2%
LI Owner Households	37.3%	30.9%	33.6%	42.8%
MI Owner Households	23.7%	20.9%	22.1%	29.0%
Owner Households with Incomes Greater than 100% AMFI	7.1%	7.0%	7.0%	9.1%
Percent Total Owner Households	21.5%	21.8%	21.7%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

Region 4 has fewer households experiencing housing problems than the statewide rate. Region 4 has the lowest rates of ELI owner households and renter households with incomes greater than 100% AMFI experiencing at least one housing problem among all the regions. Figure 5-111 shows renter and owner households in Region 4 that lack complete plumbing and/or kitchen facilities. Region 4 has higher rates of MI renter households lacking plumbing or kitchen facilities than LI renter households. MI renter households in Metro and Non-Metro counties as well as VLI renter households in Metro counties have notably high rates of units lacking plumbing or kitchen facilities.

**Figure 5-111: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 4, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 4 Total</b>	<b>State Total</b>
ELI Renter Households	3.3%	4.1%	3.7%	2.7%
VLI Renter Households	4.4%	2.8%	3.6%	2.3%
LI Renter Households	2.6%	2.6%	2.6%	1.8%
MI Renter Households	3.9%	2.9%	3.4%	1.4%
Renter Households with Incomes Greater than 100% AMFI	0.9%	1.6%	1.2%	1.2%
Percent Total Renter Households	2.7%	2.8%	2.7%	1.9%
ELI Owner Households	1.1%	3.6%	2.6%	2.6%
VLI Owner Households	1.5%	1.5%	1.5%	1.6%
LI Owner Households	1.2%	1.1%	1.2%	0.8%
MI Owner Households	0.6%	0.7%	0.6%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.3%	0.4%	0.4%	0.4%
Percent Total Owner Households	0.6%	0.9%	0.8%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

## Regional Analysis

Figure 5-112 shows renter and owner households in Region 4 that are cost burdened.

**Figure 5-112: Percent of Households Experiencing Cost Burden, Region 4, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 4 Total</b>	<b>State Total</b>
ELI Renter Households	74.7%	68.7%	71.7%	77.3%
VLI Renter Households	76.5%	64.4%	70.7%	78.1%
LI Renter Households	49.6%	35.5%	43.2%	44.5%
MI Renter Households	15.3%	13.9%	14.6%	17.0%
Renter Households with Incomes Greater than 100% AMFI	2.7%	1.4%	2.1%	4.0%
Percent Total Renter Households	43.1%	37.8%	40.6%	43.3%
ELI Owner Households	65.8%	64.8%	65.3%	70.9%
VLI Owner Households	44.4%	44.6%	44.5%	52.8%
LI Owner Households	33.5%	26.2%	29.3%	37.5%
MI Owner Households	19.8%	18.0%	18.8%	24.3%
Owner Households with Incomes Greater than 100% AMFI	5.1%	4.9%	5.0%	6.9%
Percent Total Owner Households	18.7%	19.0%	18.9%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Region 4 has low rates of cost burden compared to the state as a whole and other regions. Somewhat high rates in Non-Metro counties are balanced by low rates in Metro counties. Figure 5-113 shows renter and owner households in Region 4 that are overcrowded.

**Figure 5-113: Percent of Households Experiencing Overcrowding, Region 4, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 4 Total</b>	<b>State Total</b>
ELI Renter Households	5.4%	6.3%	5.9%	10.0%
VLI Renter Households	5.0%	6.5%	5.7%	10.7%
LI Renter Households	8.2%	7.1%	7.7%	7.9%
MI Renter Households	5.2%	6.3%	5.8%	6.2%
Renter Households with Incomes Greater than 100% AMFI	2.7%	4.4%	3.5%	3.6%
Percent Total Renter Households	5.1%	6.0%	5.6%	7.5%
ELI Owner Households	3.3%	3.1%	3.2%	5.5%
VLI Owner Households	5.6%	5.5%	5.5%	6.1%
LI Owner Households	3.7%	4.4%	4.1%	5.8%
MI Owner Households	3.6%	2.8%	3.1%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.7%	1.7%	1.7%	1.8%
Percent Total Owner Households Overcrowded	2.7%	2.8%	2.7%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

## Regional Analysis

Region 4 has relatively low rates of overcrowding, particularly for ELI and VLI renters in Metro counties. Rates of overcrowding among these household types are about half the rates for Region 3. Figure 5-114 shows the average housing costs in Region 4.

**Figure 5-114: Average Housing Costs, Region 4, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$597
Average Monthly Rent	\$620

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Like other less densely-populated regions, the cost of housing in Region 4 is low compared to denser areas. Figure 5-115 shows the number of bedrooms in renter and owner occupied housing units in Region 4.

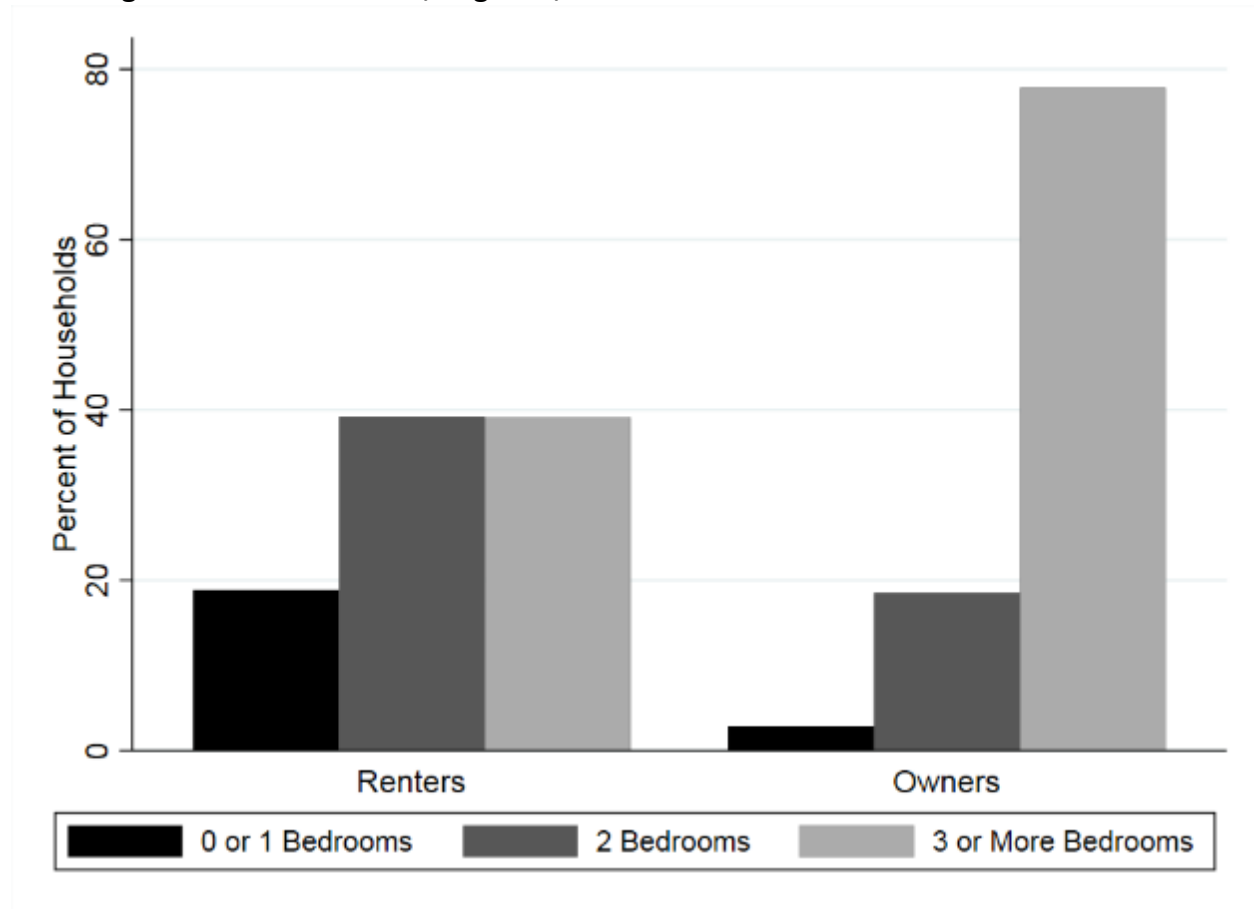
**Figure 5-115: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 4, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	115,462	19.4%	40.3%	40.3%
Owner Occupied	284,493	2.9%	18.7%	78.4%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-116 is a visual representation of the regional data from Figure 5-115.

**Figure 5-116: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 4, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Region 4 varies the most from state figures for tenure and unit size, particularly the renter occupied unit profile. Region 4 has the lowest percentage of renter occupied units with 0 or 1 bedrooms, the second highest percentage of renter occupied units with 2 bedrooms, and the third highest percentage of renter occupied units with 3 or more bedrooms among all regions.

Region 4 has the largest proportion of owner as opposed to renter occupied units among all regions. Of Region 4 housing units, 55.8% are owner occupied units with 3 or more bedrooms, the highest percentage among all regions. Region 4 has the second highest percentage of total 3 or more bedroom units and the lowest percentage of total 0 or 1 bedroom units among all regions.

Low rates of overcrowding in Region 4 are likely due to the availability of units with 3 or more bedrooms and an average household size lower than the state average. The lack of zero or one bedroom units may be a driving force behind cost burden, as people are forced to obtain a larger unit size, therefore increasing the price. Figure 5-117 maps the active multifamily properties in Region 4 participating in TDHCA programs.

**Figure 5-117: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 4, 2018**

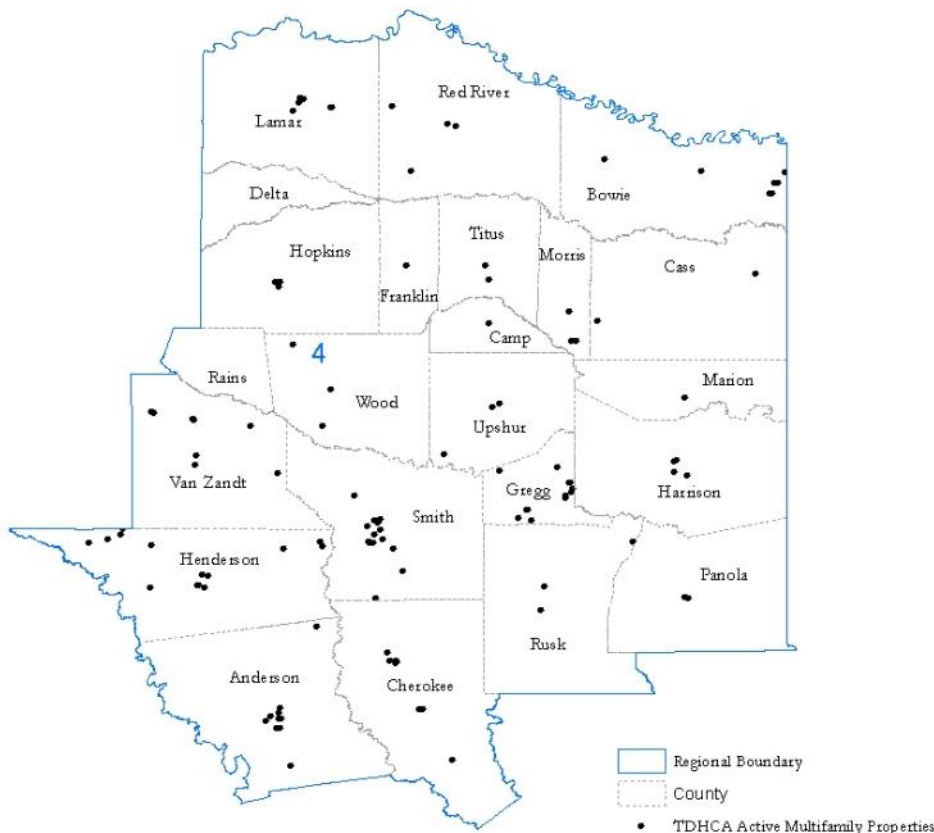


Figure 5-118 shows the number of multifamily properties participating in TDHCA programs by county in Region 4. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-118: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 4, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Anderson	13	666	665
Bowie	11	1,096	1,054
Camp	1	76	76
Cass	2	68	68
Cherokee	9	426	426
Franklin	1	100	100
Gregg	15	1,125	1,070
Harrison	4	324	314
Henderson	14	727	698
Hopkins	3	184	178
Lamar	6	344	306
Marion	1	24	24
Morris	3	60	60
Panola	3	82	82
Rains	1	56	50
Red River	4	96	82
Rusk	3	180	168
Smith	23	2,226	2,127
Titus	2	112	112
Upshur	3	78	78
Van Zandt	8	330	315
Wood	5	182	176
<b>Total</b>	<b>135</b>	<b>8,562</b>	<b>8,229</b>

Source: TDHCA, Central Database, data pull from June 2018.

Active multifamily properties participating in TDHCA programs are fairly well dispersed throughout the region, which is in line with the population dispersion.

## Region 5—“Southeast Texas”

**Point of Reference Cities:** Beaumont, Port Arthur, Nacogdoches

### Geo-Demographic Background

Also known as “Deep East,” this southeastern region shares a border with Louisiana and is populated primarily with small and medium sized towns. Region 5 also contains the Beaumont-Port Arthur MSA. Beaumont, Port Arthur, and neighboring Orange form the cities of the once-revered “Golden Triangle,” so-called following the discovery of considerable oil reserves at Spindletop Hill in 1901. Beaumont is now an important shipping point, petrochemical producer, and hospital and nursing home center. The region’s economy includes logging in the wooded areas and chemical production, in addition to oil and gas production and refineries in the southern part of the region. One of only three federally recognized tribes that reside in Texas, the Alabama-Coushatta Tribe, resides in Polk County. Figure 5-119 shows the counties of TDHCA Region 5.

**Figure 5-119: State of Texas’ Region 5 Counties**

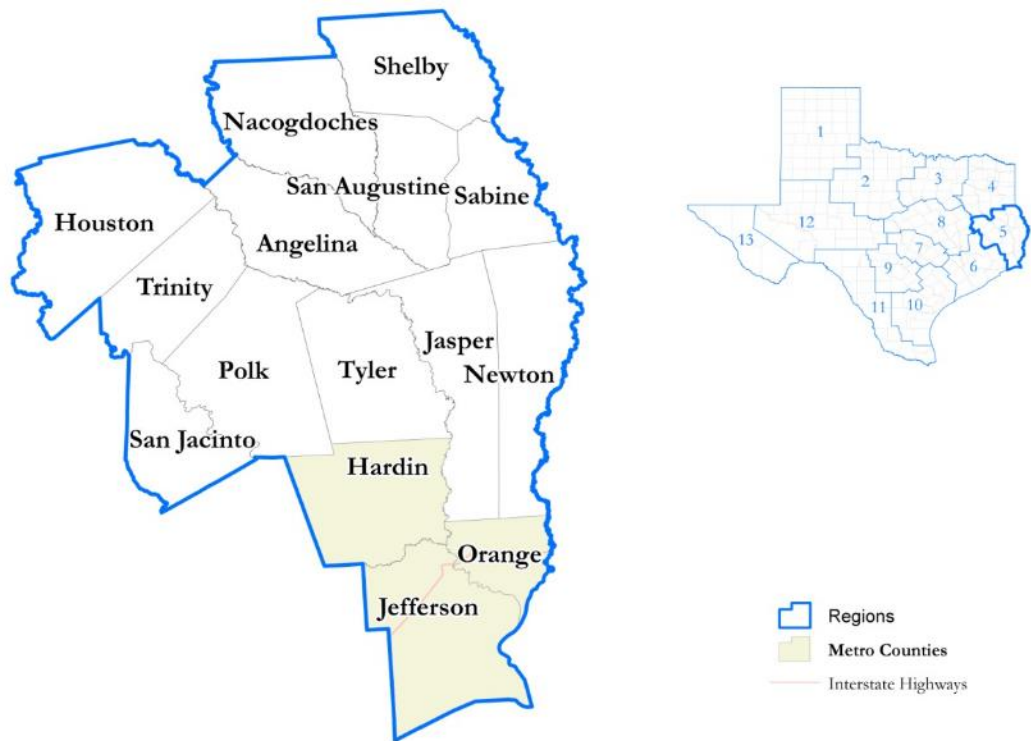


Figure 5-120 displays the population composition of Region 5 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

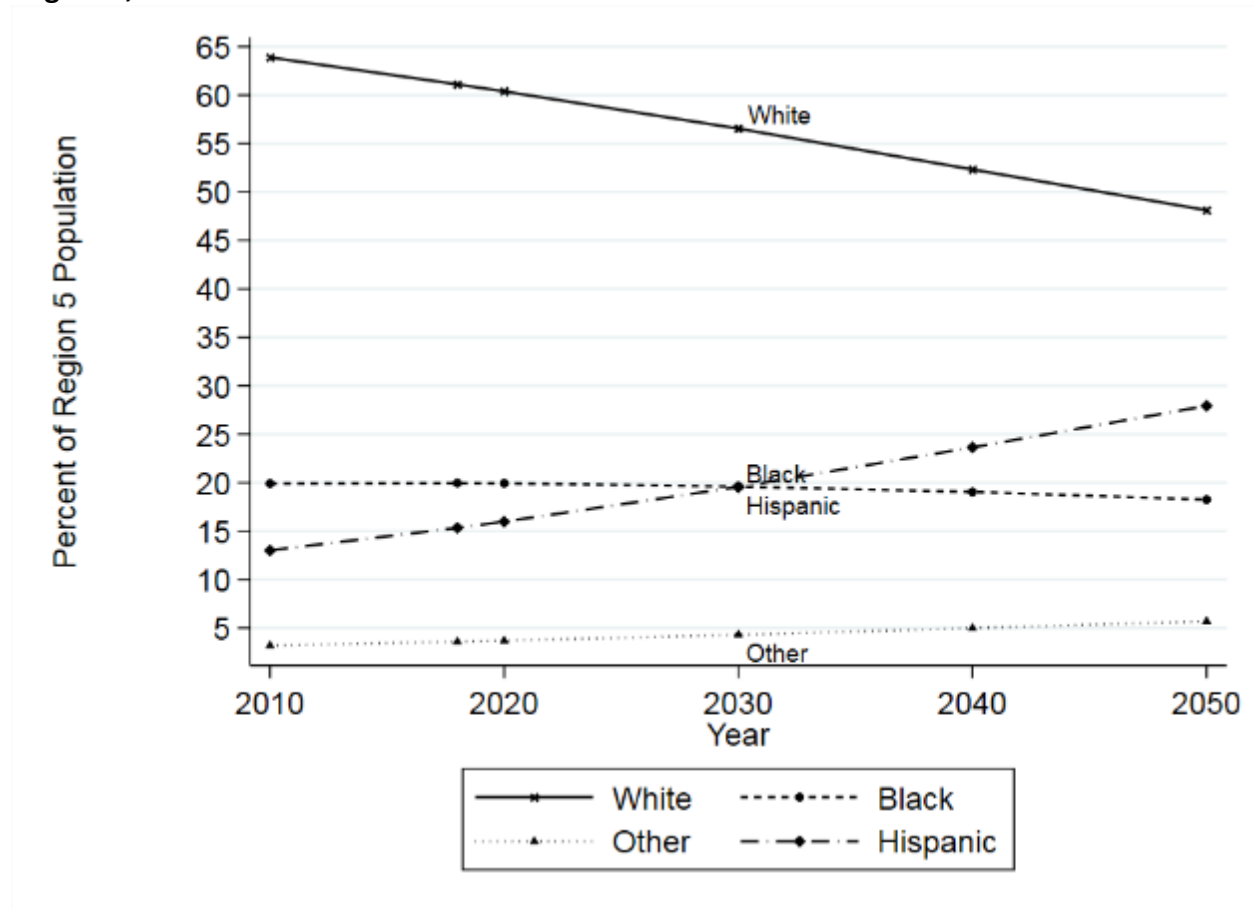
**Figure 5-120: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 5, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	63.9%	19.9%	3.2%	13.0%	767,222
2018	61.1%	20.0%	3.6%	15.3%	807,364
2020	60.4%	19.9%	3.7%	16.0%	817,678
2030	56.5%	19.6%	4.3%	19.6%	867,269
2040	52.3%	19.0%	5.0%	23.6%	908,384
2050	48.1%	18.3%	5.7%	27.9%	950,296

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Like its neighbor Region 4, Region 5 is projected to have slow demographic shifts over the coming decades. This region is currently one fifth Black and African American and only 15% Hispanic. It is the only region in the state that has fewer Hispanics or Latinos than Blacks or African Americans. Figure 5-121 is a visual representation of Figure 5-120.

**Figure 5-121: Population Projections by Race and Ethnicity as a Percentage of the Population, Region 5, 2010 to 2050**





## Race and Ethnicity

Figure 5-122 shows the R/ECAPs in Region 5. Figure 5-123 and Figure 5-124 show R/ECAPs in the Nacogdoches-Crockett-Jasper area and the Beaumont-Port Arthur area respectively. A list of the census tracts designated as R/ECAPS is available in Appendix Das well.

**Figure 5-122: Map of R/ECAPS, Region 5, 2018**

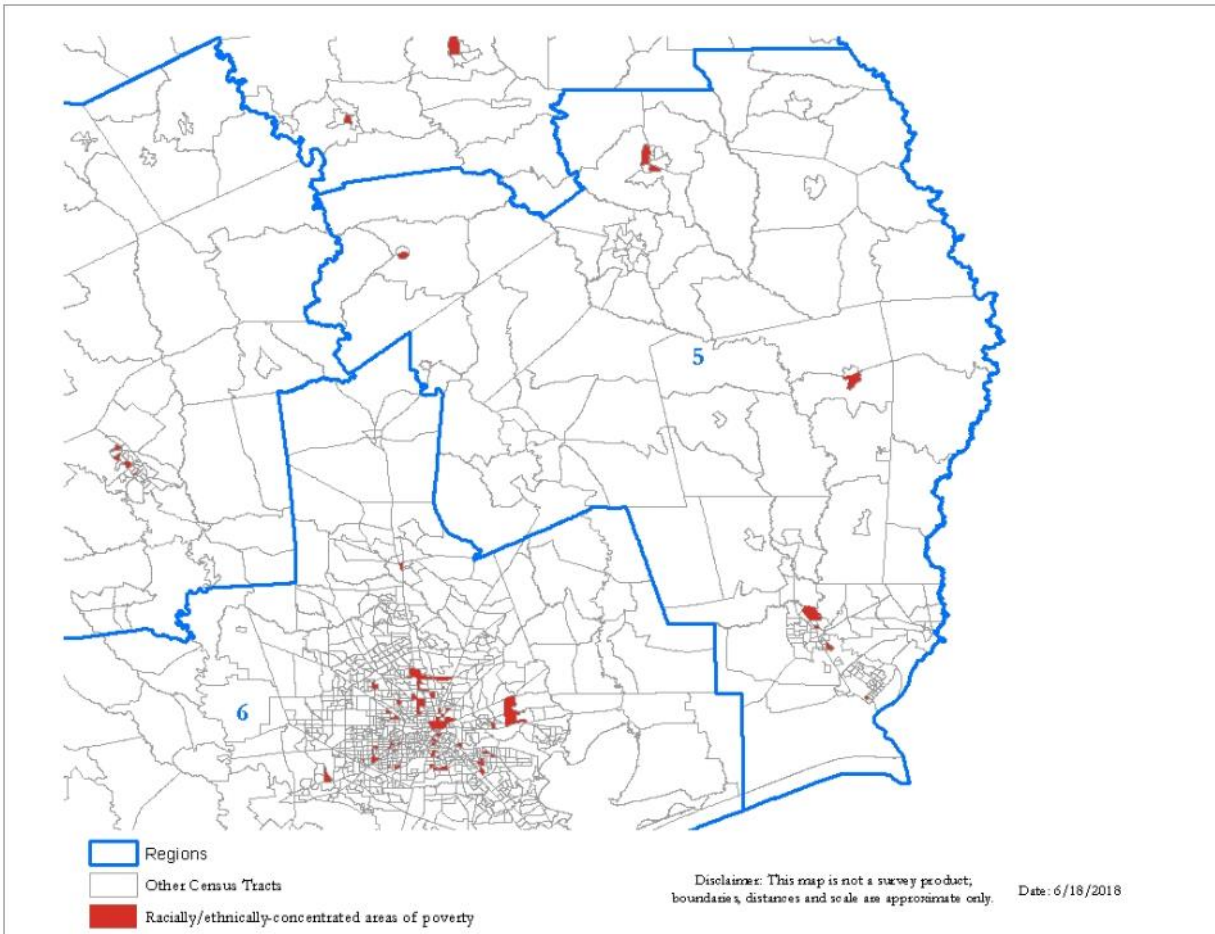


Figure 5-123: Map of R/ECAPS, Nacogdoches, Crockett, and Jasper, TX, Region 5, 2018

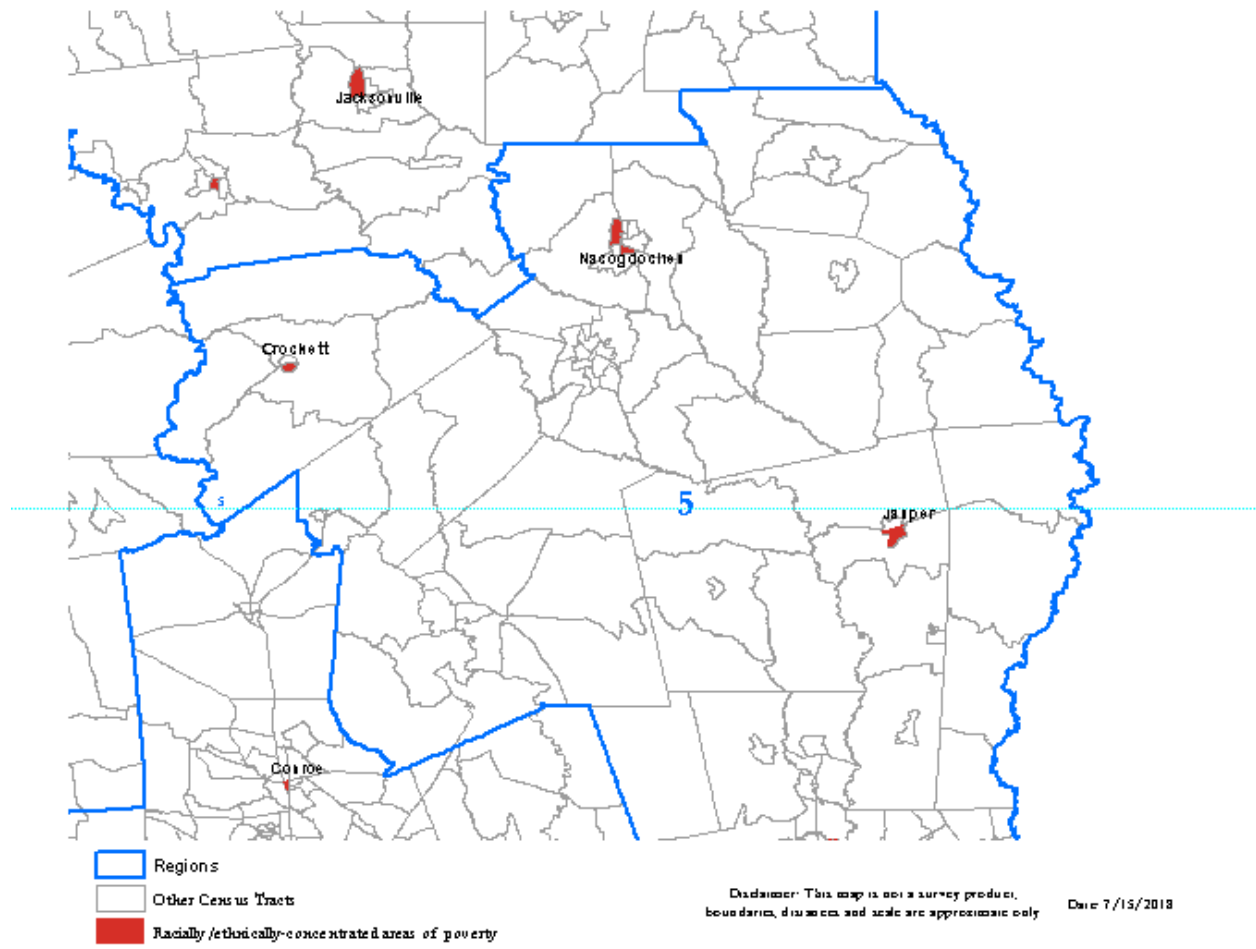


Figure 5-124: Map of R/ECAPS, Beaumont and Port Arthur, TX, Region 5, 2018

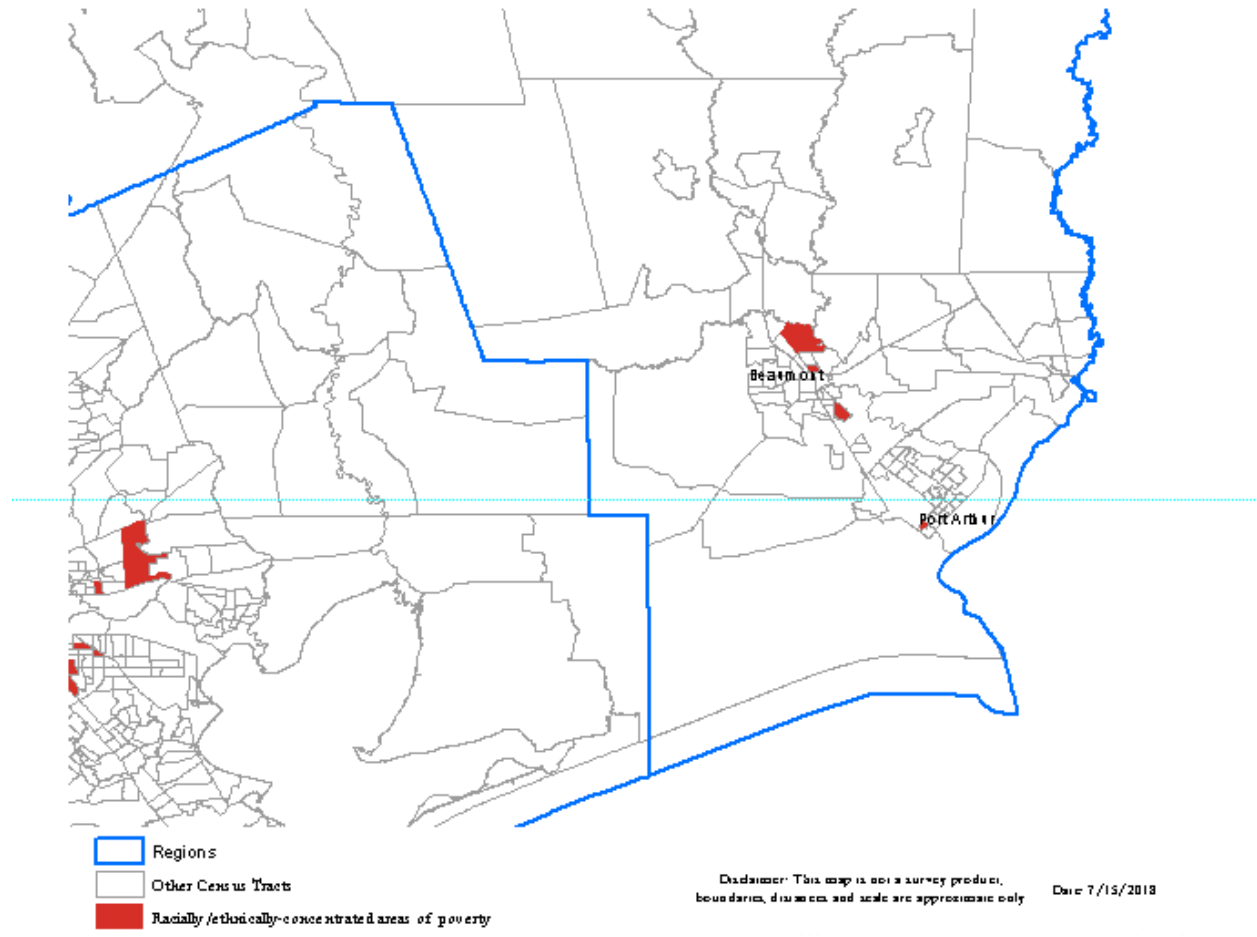
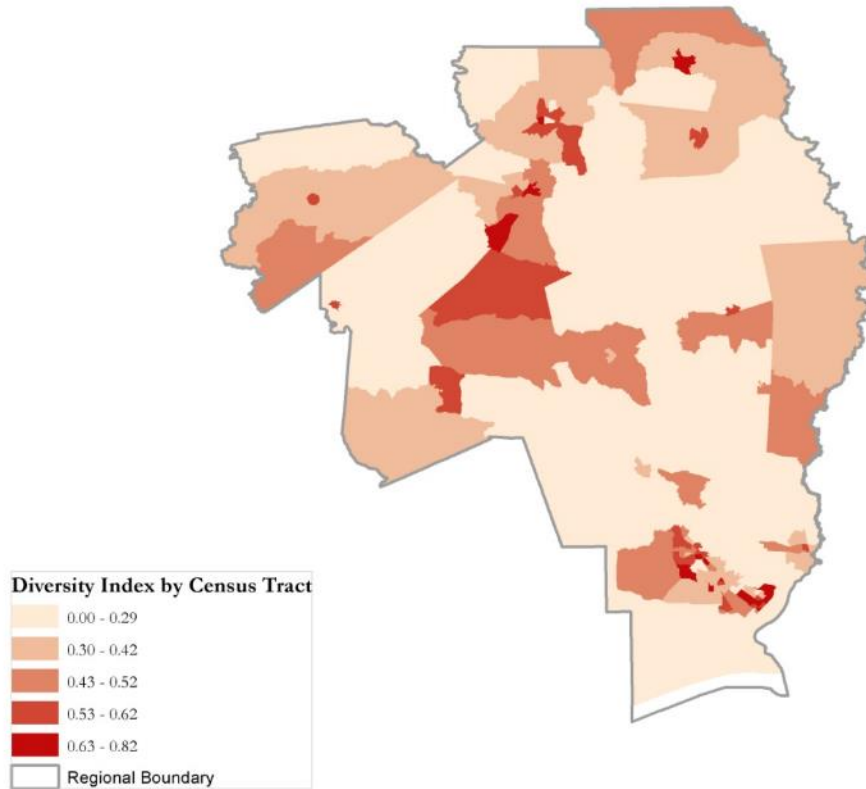


Figure 5-125 shows the Diversity Index by census tract for Region 5.

**Figure 5-125: Diversity Index, Region 5, 2018**



Diversity is largely concentrated in the four main cities in the region, Beaumont, Port Arthur, Jasper, and Nacogdoches. The northern half of Polk County, where Corrigan is located, has a relatively high Diversity Index value compared to the rest of the Region’s rural areas. Detailed tables of the diversity index by census tract can be found in Appendix E

### Household Characteristics

Figure 5-126 shows the family characteristics of households in Region 5.

**Figure 5-126: Household and Family Characteristics, Region 5, 2012 to 2016**

	<b>Texas</b>	<b>Region 5</b>
Total Households	9,289,554	282,233
Average Household Size	2.84	2.60
Percent of Households with a Minor	37.6%	32.0%
Total Family Households	6,405,049	189,184
Average Family Household Size	3.44	3.22
Average Non-Family Household Size	1.28	1.18

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

The family characteristics of Region 5 are very similar to those of Region 4. The largest difference is that the percent of male-headed households with a minor is lower in Region 5; 52.1% in Region 5 compared to 58.7% in Region 4 and 57.1% in the State of Texas. The percentage of male-headed households with a minor is the lowest percentage of all regions. Region 5 also has the lowest average non-family household size among all regions.

**Income**

Figure 5-127 displays household income by race and ethnicity for Region 5. Region 5 follows the same trend as most other regions in the state, with almost a quarter of African American households below 30% AMFI and seven out of ten African American households below the AMFI. African Americans make up 20% of the region’s population.

**Figure 5-127: Household Income Category by Race and Ethnicity, Region 5, 2010 to 2014**

	Texas	Region 5	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	13.3%	9.6%	24.8%	13.9%	16.8%	24.2%	18.4%	15.9%
VLI	12.2%	13.0%	11.1%	18.3%	9.7%	16.8%	16.1%	10.1%	16.7%
LI	16.8%	16.7%	15.6%	18.9%	14.8%	13.6%	6.5%	16.2%	20.8%
MI	9.5%	9.5%	9.5%	8.8%	9.5%	6.9%	0.0%	10.6%	11.7%
Greater than 100 Percent AMFI	48.5%	47.5%	54.2%	29.2%	52.1%	45.9%	53.2%	44.7%	35.0%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

**Disability**

Compared to other regions, Region 5 has the highest percentage of disability amongst the civilian non-institutionalized population at 17.4%. After Region 13, Region 5 has the highest rate of disability in Non-Metro counties, where one in five individuals has a disability. Unlike Region 13, Region 5 has a significant percent of the population living in Non-Metro counties, almost half of the region. Figure 5-128 shows prevalence of disability by disability type in Region 5, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. There is a significantly higher rate of ambulatory, hearing and cognitive disabilities in Region 5 compared to the statewide average. At 6.6%, Region 5 has the highest rate of cognitive difficulties of any of the other regions and also has the highest rate of cognitive difficulties in Non-Metro counties at 8.1%.

**Figure 5-128: Percent of Civilian Non-Institutionalized Population with Disability by Disability Types Region 5, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Population for Whom Poverty Status is Determined	26,478,868	742,355	391,179	351,176
Population With a Disability	3,083,141	129,171	58,399	70,772
Percent of Population with a Disability	11.6%	17.4%	14.9%	20.2%
Percent of Population with a Hearing Difficulty	3.4%	5.4%	4.5%	6.3%
Percent of Population with a Vision Difficulty	2.5%	3.5%	2.9%	4.2%
Percent of Population with a Cognitive Difficulty	4.3%	6.6%	5.4%	8.1%
Percent of Population with an Ambulatory Difficulty	6.1%	9.8%	8.5%	11.1%
Percent of Population with a Self-Care Difficulty	2.4%	3.2%	2.8%	3.7%
Percent of Population with an Independent Living Difficulty	3.9%	5.4%	4.7%	6.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-129 shows the percent of the civilian non-institutionalized population with a disability in Region 5 by gender and age. Region 5 has the highest rate of children aged 5-17 years with disabilities at 7.8%. Nearly one in ten children aged 5-17 years in the Non-Metro counties of the region has some type of disability.

**Figure 5-129: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 5, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Percent of Population with a Disability	11.6%	17.4%	14.9%	20.2%
Percent of Males with a Disability	11.5%	17.7%	15.0%	20.8%
Percent of Female with a Disability	11.8%	17.1%	14.9%	19.5%
Percent of Minors With a Disability	4.2%	5.9%	4.8%	7.3%
Percent of Children Under Age 5 with a Disability	0.8%	1.0%	0.7%	1.3%
Percent of Children Aged 5-17 with a Disability	5.5%	7.8%	6.3%	9.5%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-130 shows the percent of the civilian non-institutionalized population with a disability in Region 5 by race/ethnicity. Higher rates of disability among almost all races and ethnicities is consistent with the higher overall rate of disability in Region 5 compared to the state and other regions. With Region 5 having the highest rate of disability in the state, it also sees some of the highest rates across race and ethnicity with the exception of Hispanics or Latinos.

**Figure 5-130: Percent of Civilian Non-Institutionalized Population with Disability by Race/Ethnicity, Region 5, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Population	11.6%	17.4%	14.9%	20.2%
White	11.9%	17.7%	15.0%	20.4%
Black or African American	13.4%	17.7%	15.7%	21.4%
American Indian or Alaskan Native	15.8%	17.0%	25.7%	12.3%
Asian	5.7%	6.5%	6.2%	7.5%
Hawaiian or Other Pacific Islander	8.5%	9.7%	18.2%	0.0%
Some Other Race	9.2%	10.9%	12.8%	9.7%
Two or More Races	11.1%	17.4%	15.3%	19.8%
Hispanic or Latino	9.5%	8.2%	8.1%	8.4%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

### Poverty

Region 5 has slightly higher rates of poverty than the state but overall aligns closely with state levels. Figure 5-131 shows the prevalence of poverty in Region 5 by poverty level.

**Figure 5-131: Poverty Rates by Poverty Level, Region 5, 2012 to 2016**

	Texas	Region 5
Total Population for Whom Poverty Status is Determined	26,334,005	733,474
Below 100% Poverty (Overall Poverty Rate)	16.7%	18.9%
Below 50% of Poverty	7.0%	8.4%
Below 150% of Poverty	27.3%	30.5%
Below 200% of Poverty	37.2%	40.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-132 shows the percent of individuals below the poverty line (100% poverty) in Region 5 by age, gender and race/ethnicity. Across gender, Region 2 has a higher rate of females living in poverty compared to the state and compared to males within the same region. In Region 5, more than 30% of Black and African American residents, more than 40% of American Indians and Alaskan Natives, more than 20% of Asians, and almost 28% of Hispanics or Latinos live below the poverty line. Compared to other regions, Region 5 has the highest poverty rate among American Indians and Alaskan Natives, almost double that of the state, which is likely attributed to the Alabama-Coushatta Indian Reservation being located in the region.

**Figure 5-132: Poverty Rates by Age, Gender and Race/Ethnicity, Region 5, 2012 to 2016**

	<b>Texas</b>	<b>Region 5</b>
Total Population for Whom Poverty Status is Determined	26,334,005	733,474
Below 100% Poverty (Overall Poverty Rate)	16.7%	18.9%
Metro County	16.4%	17.7%
Non-Metro County	18.7%	20.2%
Under 18	23.9%	27.4%
Male	15.2%	16.6%
Female	18.2%	21.0%
White	15.5%	15.2%
Black or African American	22.6%	31.1%
American Indian and Alaskan Native	21.2%	41.1%
Asian	11.1%	21.8%
Hawaiian and Other Pacific Islander	14.0%	11.7%
Some Other Race	24.4%	23.3%
Two or More Races	17.2%	27.0%
Hispanic or Latino	24.2%	27.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

### Employment

Figure 5-133 shows the share of job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Beaumont-Port Arthur, TX. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. More than half of job holders drive over 10 miles to work, with almost one in four job holders driving over 50 miles to work.

**Figure 5-133: Share of Job Counts by Distance between Work Census Block and Home Census Block, Beaumont-Port Arthur CBSA, TX, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	154,096	100.0%
Less than 10 miles	66,347	43.1%
10 to 24 miles	40,461	26.3%
25 to 50 miles	9,670	6.3%
Greater than 50 miles	37,618	24.4%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-134 shows the employment and living situation for individuals in each county of Region 5. Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it. Jobs in the region are primarily located in Jefferson County, where a majority of the Beaumont-Port Arthur CBSA is located. There are a large number of individuals who are employed in the city they do not live in, which may be due to jobs primarily being in the



Beaumont-Port Arthur CBSA, however, this could also be attributed to individuals who commute into nearby Region 6, or even across the border into Louisiana.

**Figure 5-134: Employment and Living Situations, Counties in Region 5, 2015**

County	Employed in County & Living Outside	Lived and Worked in County	Live in County and employed outside	Percent Live in County and employed outside
Angelina	16,250	21,207	13,451	38.8%
Hardin	7,524	5,095	16,558	76.5%
Houston	2,665	2,539	4,807	65.4%
Jasper	5,804	4,565	6,995	60.5%
Jefferson	55,390	62,790	36,422	36.7%
Nacogdoches	10,073	12,499	10,980	46.8%
Newton	733	410	3,224	88.7%
Orange	10,772	11,382	23,474	67.3%
Polk	5,278	4,945	9,297	65.3%
Sabine	1,126	917	1,785	66.1%
San Augustine	772	765	1,896	71.3%
San Jacinto	883	848	6,754	88.8%
Shelby	3,873	3,904	3,880	49.8%
Trinity	1,150	850	3,785	81.7%
Tyler	1,607	1,657	3,966	70.5%
Total	123,900	134,373	147,274	52.3%

Source: On the map data, 2015, with out of state employment data excluded.

Figure 5-135 shows the mean travel time to work for counties in Region 5. Average commute times vary widely across counties within the region ranging from 17.8 minutes to 40.1 minutes. A majority of commute times in counties of Region 5 are greater than 25 minutes.

**Figure 5-135: Mean Travel Time to Work, Counties in Region 5, 2012 to 2016**

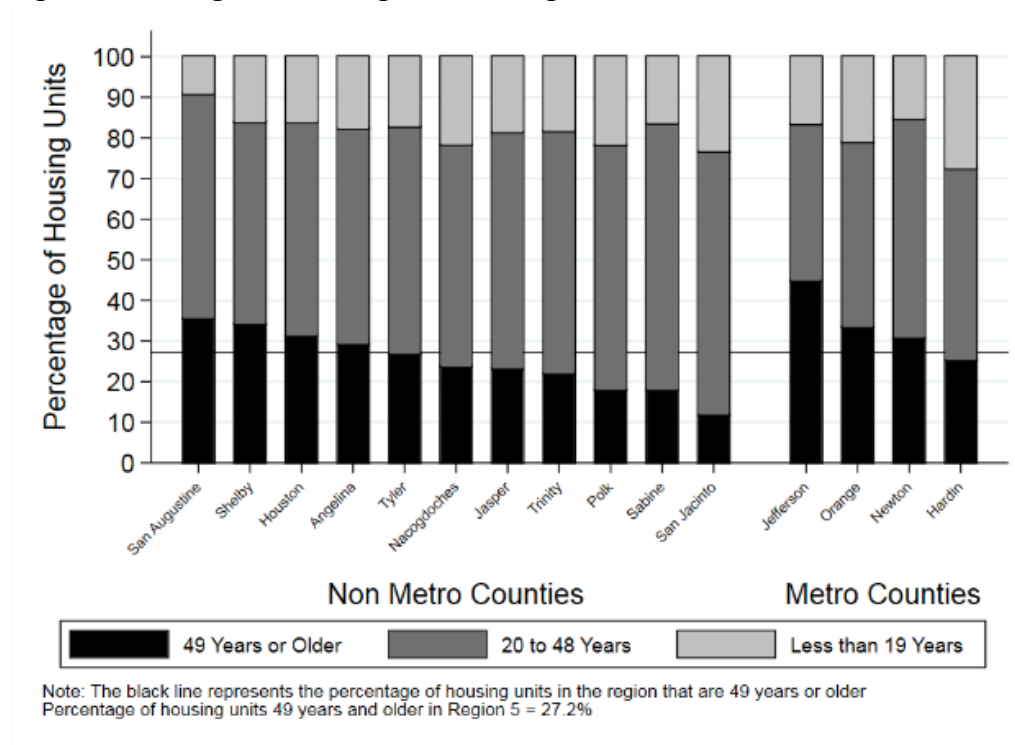
<b>County</b>	<b>Mean travel time to work (minutes)</b>
Angelina	17.8
Hardin	27.8
Houston	25.7
Jasper	30
Jefferson	19.4
Nacogdoches	19.8
Newton	35.2
Orange	23.6
Polk	28.7
Sabine	26.5
San Augustine	25.1
San Jacinto	40.1
Shelby	27.5
Trinity	33.6
Tyler	34.3

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 5-136 shows the age of housing stock in Region 5.

**Figure 5-136: Age of Housing Stock in Region 5, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Figure 5-137 shows the age of housing stock in Region 5 in a tabular format. Region 5 primarily has housing units between 20 and 48 years old. Figure 5-138 shows the percent of households in Region 5 experiencing one or more housing problems by income category and housing tenure.

**Figure 5-137: Age of Housing Stock in Region 5, By County, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Angelina	29.2%	53.1%	17.7%
Hardin	25.3%	47.1%	27.6%
Houston	31.3%	52.5%	16.2%
Jasper	23.2%	58.2%	18.7%
Jefferson	44.9%	38.5%	16.6%
Nacogdoches	23.7%	54.7%	21.7%
Newton	30.8%	53.9%	15.3%
Orange	33.4%	45.6%	21.0%
Polk	17.9%	60.3%	21.8%
Sabine	17.9%	65.7%	16.4%
San Augustine	35.5%	55.3%	9.2%
San Jacinto	11.8%	64.8%	23.3%
Shelby	34.2%	49.7%	16.1%
Trinity	22.0%	59.7%	18.3%
Tyler	26.8%	56.0%	17.2%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

**Figure 5-138: Percent of Households with One or More Housing Problems, Region 5, 2010 to 2014**

<b>Households with One or More Housing Problems</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 5 Total</b>	<b>State Total</b>
ELI Renter Households	70.9%	69.7%	70.3%	79.4%
VLI Renter Households	78.0%	72.4%	75.3%	82.7%
LI Renter Households	53.4%	45.5%	49.6%	52.1%
MI Renter Households	27.3%	21.5%	24.8%	24.2%
Renter Households with Incomes Greater than 100% AMFI	8.1%	6.3%	7.4%	8.5%
Percent Total Renter Households	45.8%	45.4%	45.6%	48.2%
ELI Owner Households	69.1%	67.4%	68.3%	73.6%
VLI Owner Households	45.4%	40.4%	42.9%	57.2%
LI Owner Households	29.6%	28.2%	28.9%	42.8%
MI Owner Households	23.1%	15.0%	18.9%	29.0%
Owner Households with Incomes Greater than 100% AMFI	7.3%	6.5%	6.9%	9.1%
Percent Total Owner Households	20.5%	20.2%	20.3%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

Region 5 has the lowest rate of ELI renter households experiencing housing problems, the third lowest rate for ELI owner households, the lowest rate for VLI owner households, the third lowest rate for LI owner households, and the second lowest rate for MI owner households. Figure 5-139 shows renter and owner households in Region 5 lacking complete plumbing or kitchen facilities.

**Figure 5-139: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 5, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 5 Total</b>	<b>State Total</b>
ELI Renter Households	1.9%	3.3%	2.6%	2.7%
VLI Renter Households	1.9%	3.1%	2.5%	2.3%
LI Renter Households	1.3%	1.8%	1.6%	1.8%
MI Renter Households	1.1%	2.1%	1.5%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.9%	1.7%	1.8%	1.2%
Percent Total Renter Households	1.7%	2.5%	2.1%	1.9%
ELI Owner Households	1.2%	2.8%	2.0%	2.6%
VLI Owner Households	0.6%	1.9%	1.3%	1.6%
LI Owner Households	0.6%	1.9%	1.3%	0.8%
MI Owner Households	1.0%	1.3%	1.2%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.7%	0.9%	0.8%	0.4%
Percent Total Owner Households	0.8%	1.4%	1.1%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

## Regional Analysis

For all households with less than or equal to 100% AMFI, lacking plumbing or kitchen facilities is more likely in Non-Metro than Metro counties. Households with incomes greater than 100% AMFI have relatively high rates of units lacking plumbing or kitchen facilities compared to other regions with higher rates in Metro counties for renters and Non-Metro counties for owners. Figure 5-140 shows renter and owner households in Region 5 that are cost burdened.

**Figure 5-140: Percent of Households Experiencing Cost Burden, Region 5, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 5 Total</b>	<b>State Total</b>
ELI Renter Households	68.8%	67.3%	68.1%	77.3%
VLI Renter Households	77.1%	67.6%	72.6%	78.1%
LI Renter Households	49.2%	40.5%	45.0%	44.5%
MI Renter Households	20.8%	9.3%	15.9%	17.0%
Renter Households with Incomes Greater than 100% AMFI	3.4%	2.3%	3.0%	4.0%
Percent Total Renter Households	42.4%	40.7%	41.6%	43.3%
ELI Owner Households	67.6%	64.9%	66.2%	70.9%
VLI Owner Households	41.8%	36.1%	38.9%	52.8%
LI Owner Households	26.9%	23.0%	24.9%	37.5%
MI Owner Households	19.5%	11.0%	15.1%	24.3%
Owner Households with Incomes Greater than 100% AMFI	5.1%	4.0%	4.6%	6.9%
Percent Total Owner Households	18.0%	16.9%	17.5%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Region 5, similarly to Region 4, has low rates of cost burden. Slightly higher rates in Non-Metro counties are offset by low rates in Metro counties. This may indicate that housing is simply more affordable in Region 4. Figure 5-141 shows renter and owner households in Region 5 that are overcrowded.

**Figure 5-141: Percent of Households Experiencing Overcrowding, Region 5, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 5 Total</b>	<b>State Total</b>
ELI Renter Households	4.7%	4.6%	4.6%	10.0%
VLI Renter Households	3.2%	8.5%	5.7%	10.7%
LI Renter Households	4.3%	5.1%	4.7%	7.9%
MI Renter Households	5.6%	10.3%	7.6%	6.2%
Renter Households with Incomes Greater than 100% AMFI	2.9%	2.4%	2.7%	3.6%
Percent Total Renter Households	3.9%	5.4%	4.6%	7.5%
ELI Owner Households	2.6%	3.5%	3.0%	5.5%
VLI Owner Households	4.1%	4.3%	4.2%	6.1%
LI Owner Households	3.1%	4.0%	3.6%	5.8%
MI Owner Households	2.8%	2.8%	2.8%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.5%	1.7%	1.6%	1.8%
Percent Total Owner Households Overcrowded	2.2%	2.6%	2.4%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Overcrowding rates in Region 5 are very similar to rates in Region 4. Rates are very low, with a spike for MI renter households in Non-Metro counties. Rates are higher in Non-Metro counties with the exception of ELI renter and MI owner households.

**Figure 5-142: Average Housing Costs, Region 5, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$518
Average Monthly Rent	\$593

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Figure 5-142 shows the average housing costs in Region 5. Region 5, one of the regions with a larger Non-Metro population in the state, has much lower housing costs than regions with a larger Metro population. Figure 5-143 shows the number of bedrooms in renter and owner occupied households in Region 5.

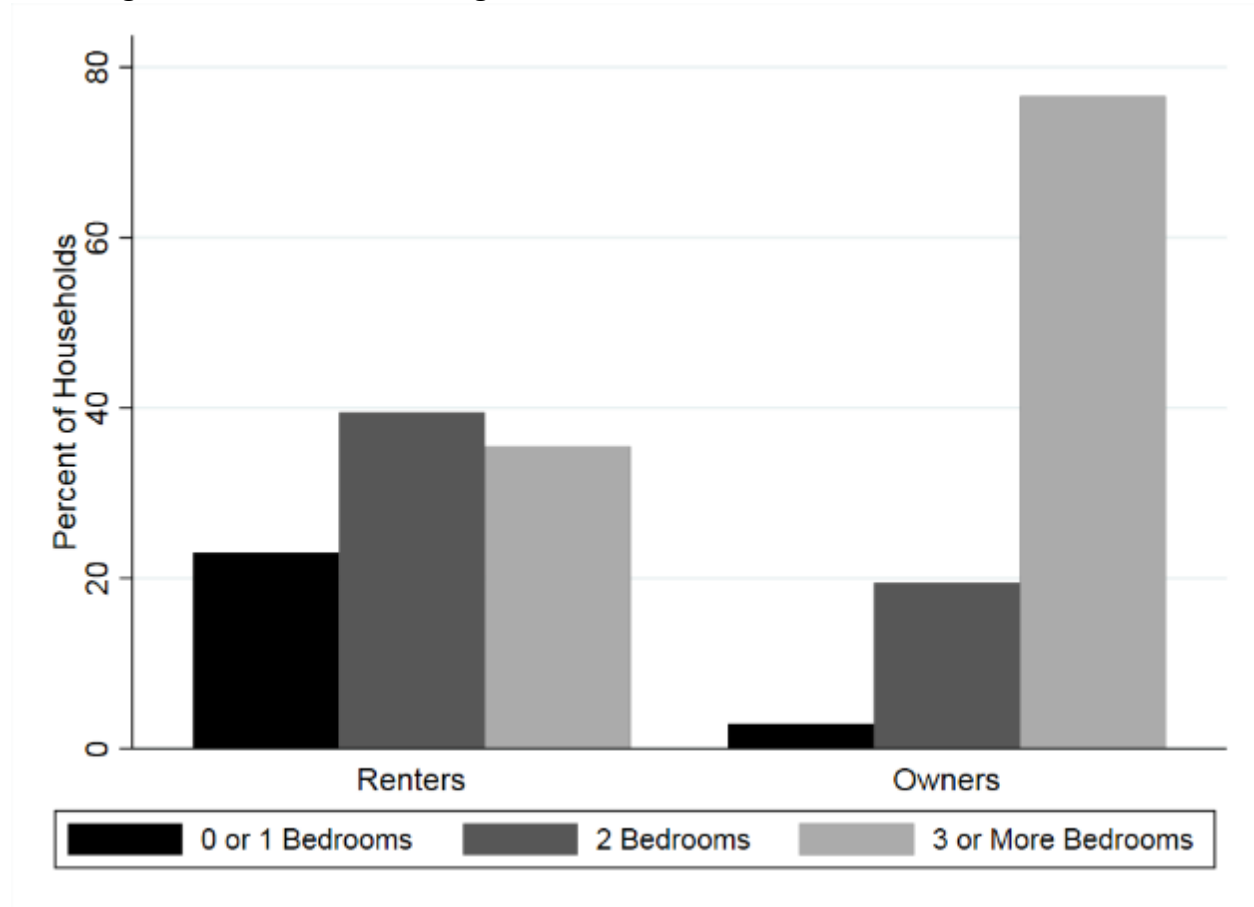
**Figure 5-143: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 5, 2010 to 2014**

	<b>Total Units</b>	<b>Percent of Units with 0 or 1 Bedrooms</b>	<b>Percent of Units with 2 Bedrooms</b>	<b>Percent of Units with 3 or More Bedrooms</b>
Renter Occupied	82,216	23.5%	40.3%	36.2%
Owner Occupied	194,913	2.9%	19.7%	77.4%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-144 is a visual representation of Figure 5-143, showing the number of bedrooms in renter and owner occupied households in Region 5.

**Figure 5-144: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 5, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

The tenure and unit size profile of Region 5 is close to that of Region 4. Region 5 has the second largest proportion of owner as opposed to renter occupied units among all regions behind Region 4. Of Region 5 housing units, 54.4% are owner occupied units with 3 or more bedrooms, the second highest percentage among all regions also behind Region 4. Region 5 has the second lowest percentage of total 0 or 1 bedroom units, again behind Region 4. Figure 5-145 maps the active multifamily properties in Region 5 participating in TDHCA programs.

**Figure 5-145: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 5, 2018**

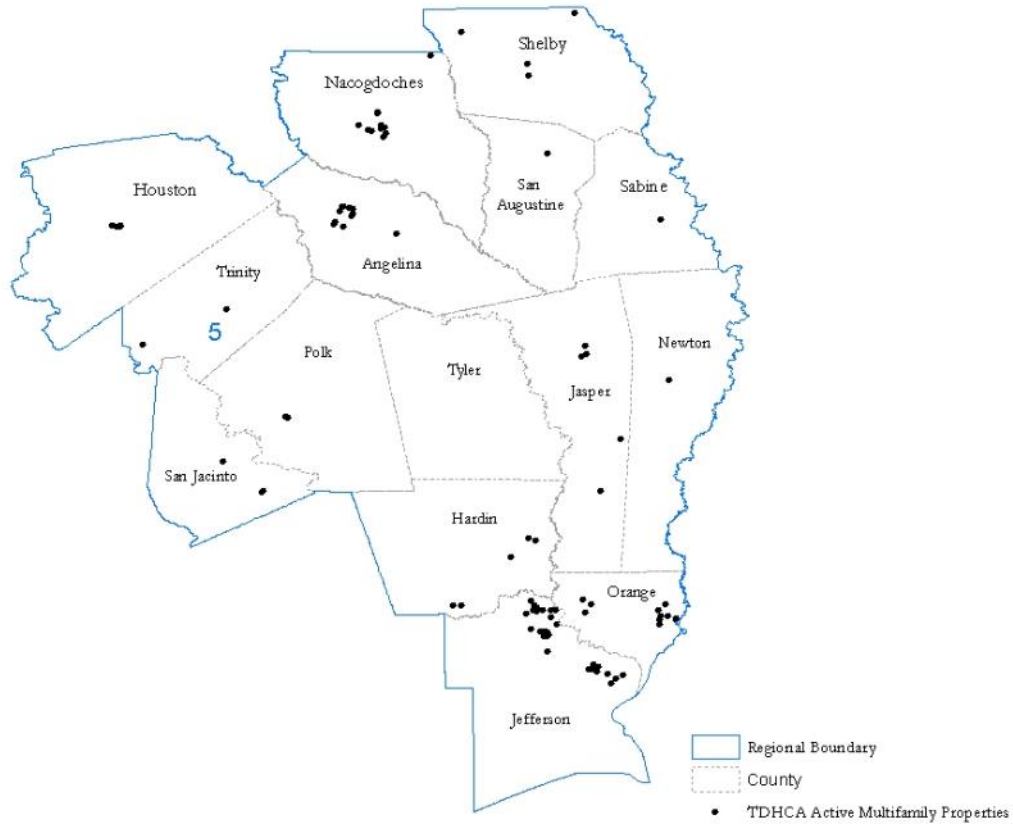


Figure 5-146 shows the number of active multifamily properties participating in TDHCA programs by county in Region 5. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.



**Figure 5-146: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 5, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Angelina	13	900	886
Hardin	7	434	405
Houston	4	210	206
Jasper	6	228	224
Jefferson	38	4,909	4,582
Nacogdoches	12	816	813
Newton	1	24	23
Orange	14	1,099	1,089
Polk	3	110	110
Sabine	1	32	32
San Augustine	1	36	36
San Jacinto	3	128	128
Shelby	4	118	118
Trinity	2	68	68
<b>Total</b>	<b>109</b>	<b>9,112</b>	<b>8,720</b>

Source: TDHCA, Central Database, data pull from June 2018.

The highest concentration of TDHCA multifamily properties is in Jefferson County, a local job center that contains the Beaumont-Port Arthur MSA. Other clusters of properties exist in Orange, Angelina, and Nacogdoches counties, which contain Orange, Lufkin, and Nacogdoches, respectively.

## Region 6—“Gulf Coast”

**Point of Reference Cities:** Houston, Galveston

### Geo-Demographic Background

The Gulf Coast region is an economically and demographically diverse region with a rich Texan history. Due to the region’s prime location along the Gulf of Mexico and the presence of natural ports, many European colonists claimed the area as their new home. The most sought-after part of the region was Galveston Island, as a trade port. The Republic of Texas temporarily established their capital in Galveston in 1836.

Today the region is dominated by the City of Houston. The fourth largest city in the country, Houston is a complex, international city with a healthy economy built on the oil and gas industry, chemical industry, aeronautics, and shipping. Houston’s inner city is divided into nine wards. It is the largest city in the U.S. without formal zoning regulations.

Though the city is very diverse overall, there are very distinct clusters of African American, Hispanic, and Asian communities within the city. The Houston suburbs are vast, sprawling far beyond the urban core, and are majority White. Houston’s robust oil and gas industry supports many gas and chemical refineries near the coast and around the periphery of the Metro area. More affluent communities are generally located to the west and north of Houston, away from more industrial areas. Areas not yet included in the reaches of developing Houston have agricultural-based economies. Figure 5-147 shows the counties of TDHCA Region 6.

**Figure 5-147: State of Texas’ Region 6 Counties**

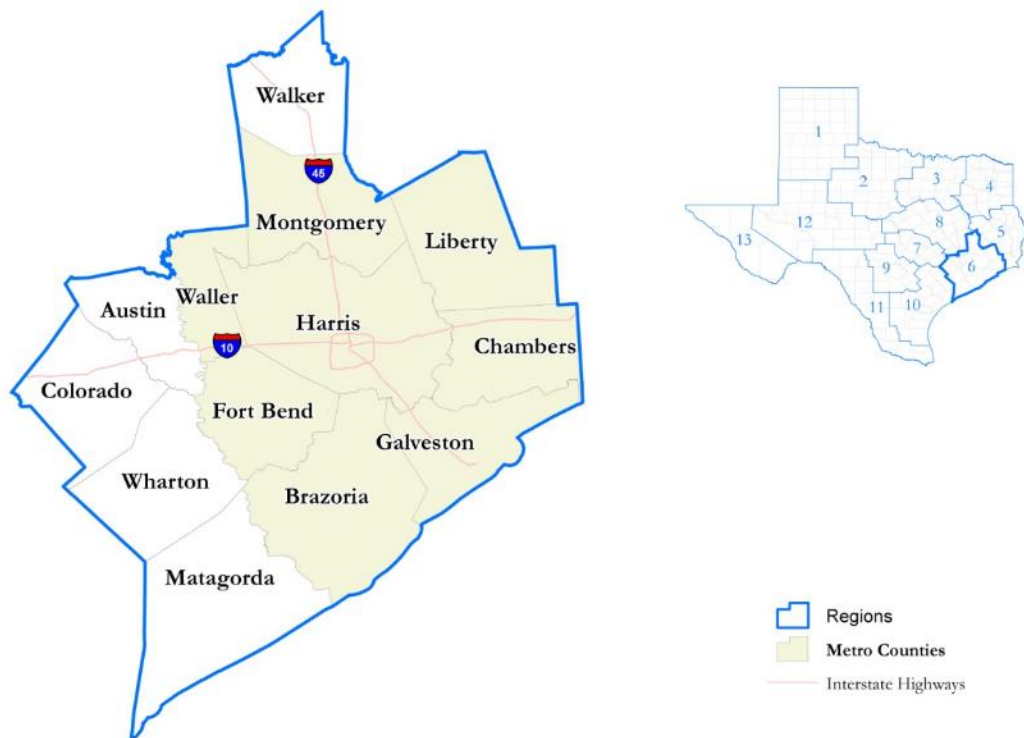


Figure 5-148 displays the population projections of Texas by race and ethnicity as a percentage of the population of Region 6 from 2010 through 2050.

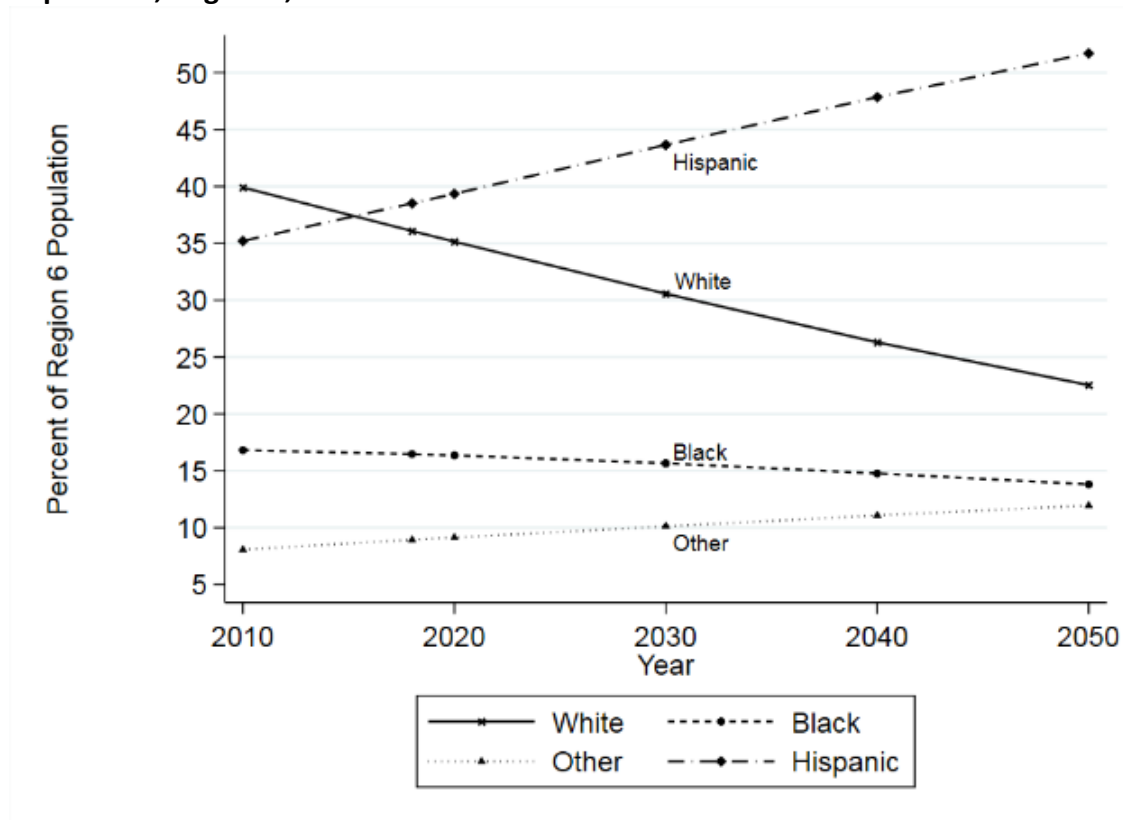
**Figure 5-148: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 6, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	39.9%	16.8%	8.1%	35.2%	6,087,133
2018	36.1%	16.5%	8.9%	38.5%	6,874,572
2020	35.2%	16.4%	9.1%	39.4%	7,075,093
2030	30.6%	15.7%	10.1%	43.7%	8,111,578
2040	26.3%	14.8%	11.1%	47.9%	9,157,981
2050	22.5%	13.8%	11.9%	51.7%	10,205,569

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Like Region 3 (the Dallas-Fort Worth Metroplex), Region 6 is already majority-minority with Hispanics making up the largest group in the region. The growth of the Hispanic population is projected to steadily increase, while the percentage of White, Non-Hispanic population is predicted to decline over the next 30 years. Overall, the region is experiencing and will continue to experience explosive population growth. Figure 5-149 is a visual representation of Figure 5-148.

**Figure 5-149: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 6, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 5-150 shows the R/ECAPS in Region 6. A list of the census tracts designated as R/ECAPS is available in Appendix D as well.

**Figure 5-150: Map of R/ECAPS, Region 6, 2018**

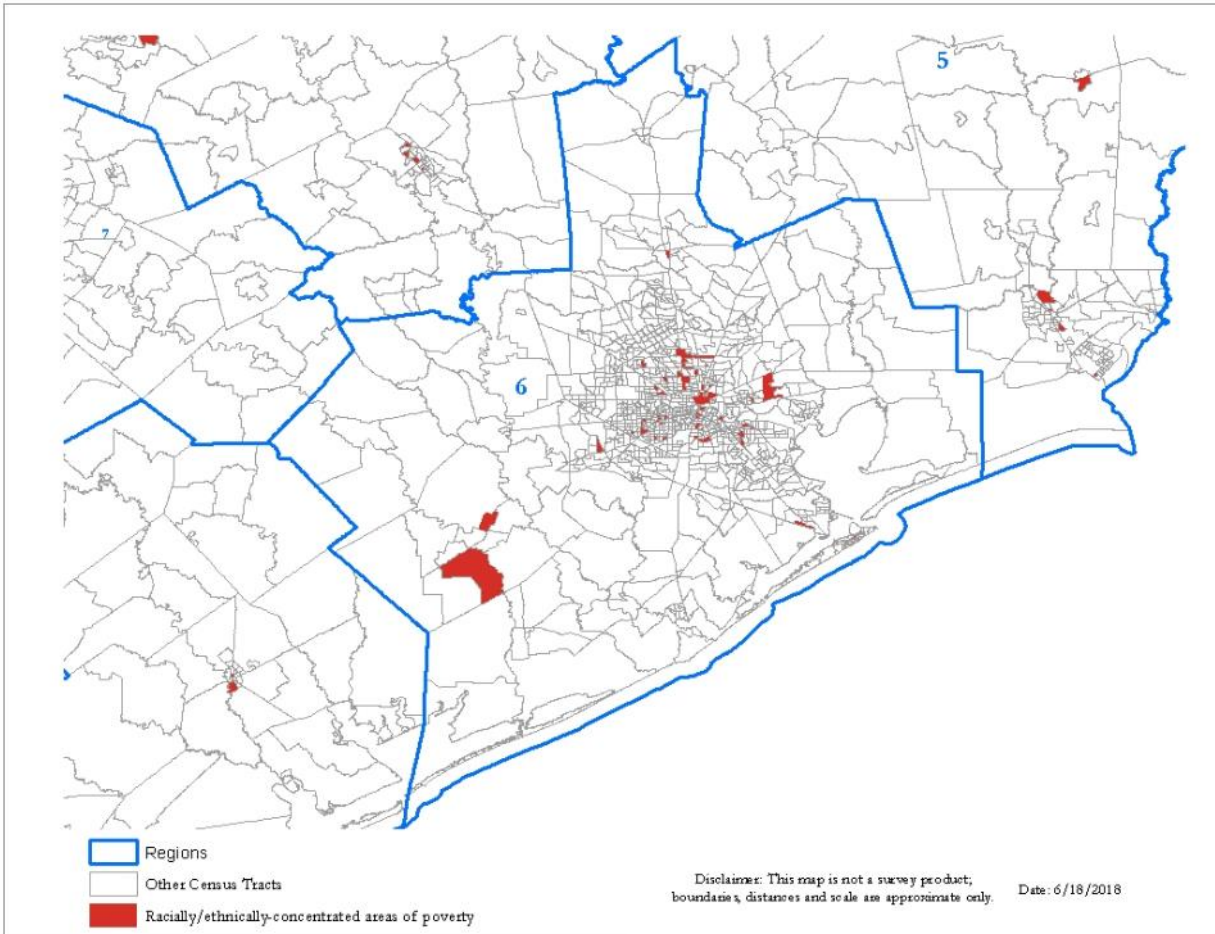


Figure 5-151: Map of R/ECAPS, Houston, TX, Region 6, 2018

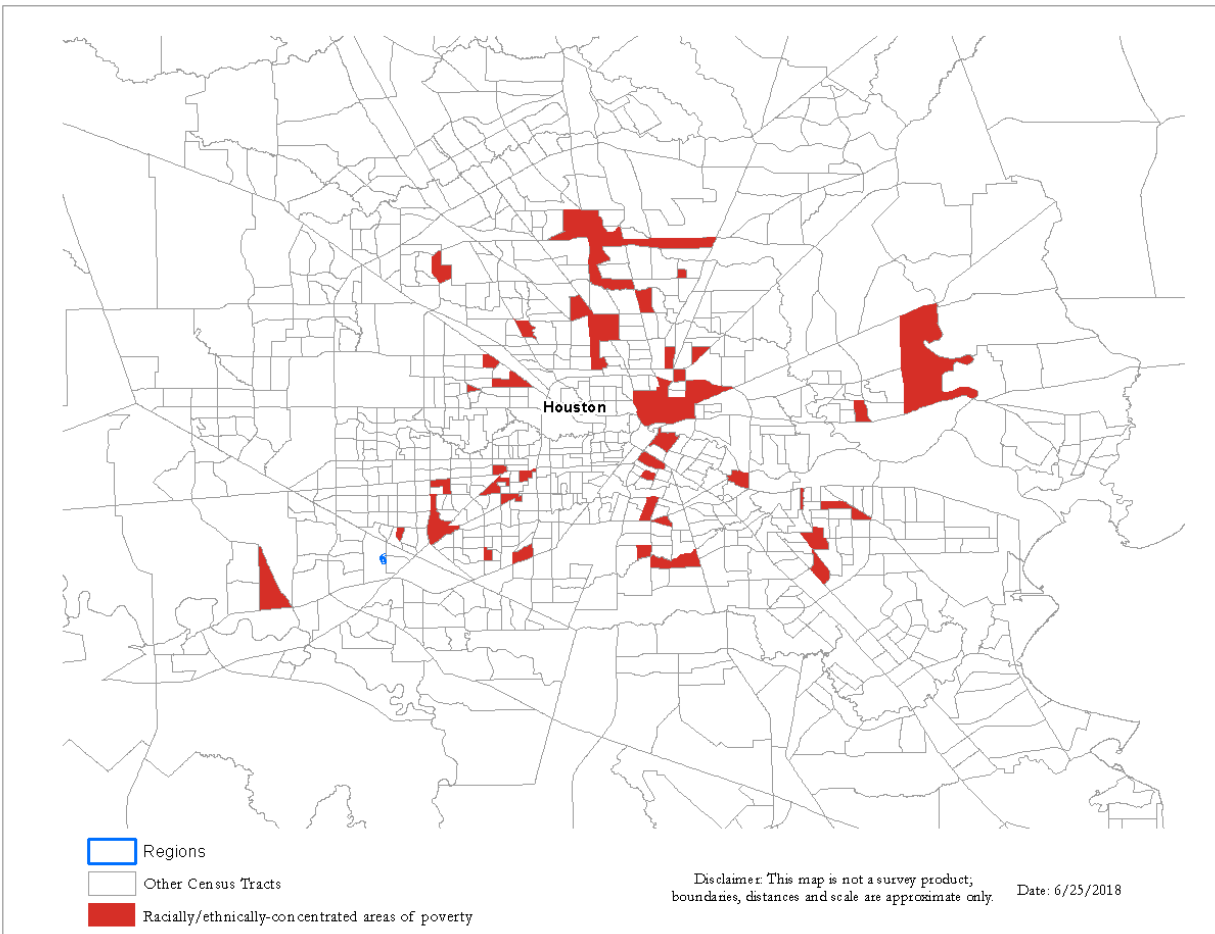


Figure 5-152: Map of R/ECAPS, Conroe, TX, Region 6, 2018

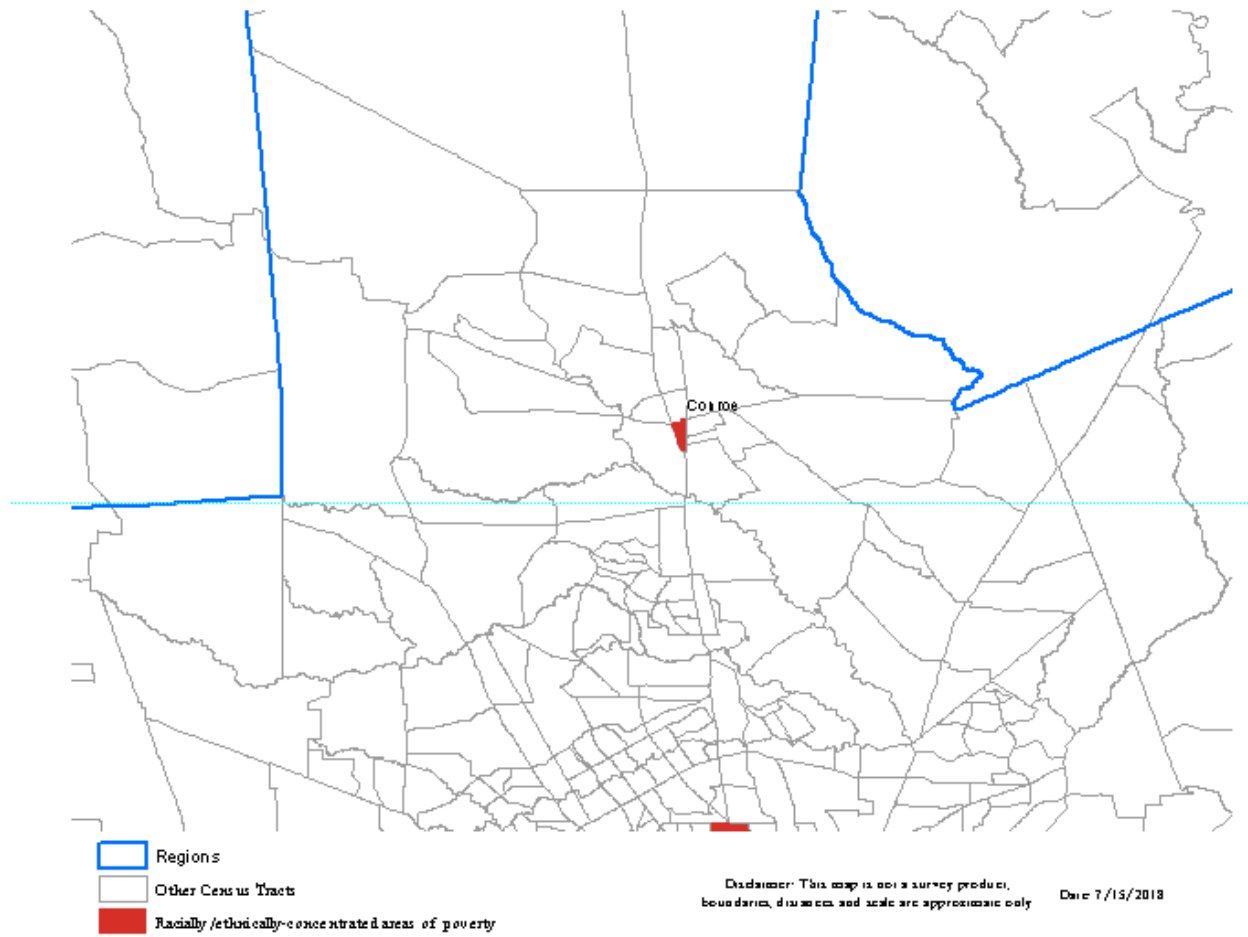


Figure 5-153: Map of R/ECAPS, El Campo, TX, Region 6, 2018

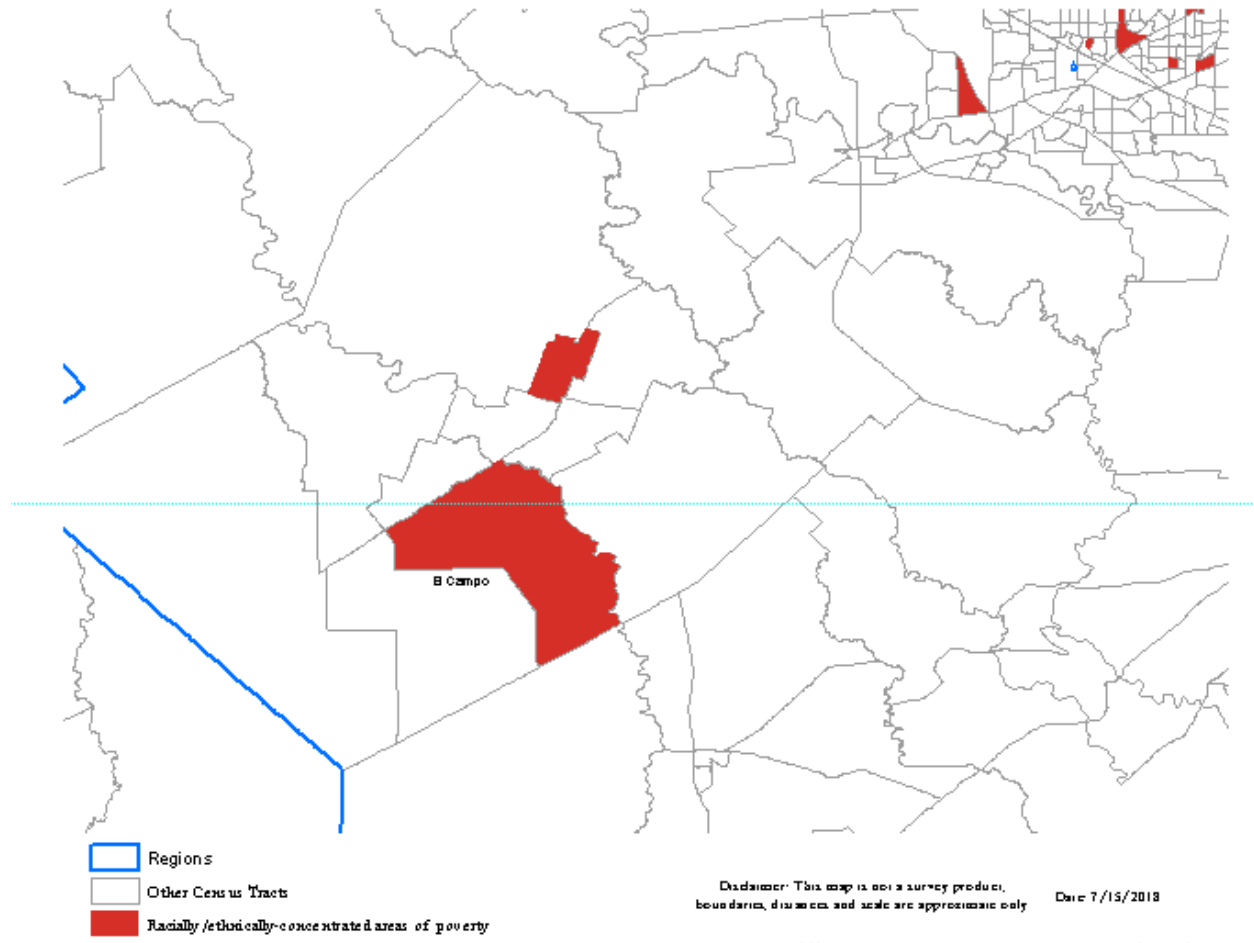


Figure 5-154: Map of R/ECAPS, Galveston and Hitchcock City, TX, Region 6, 2018

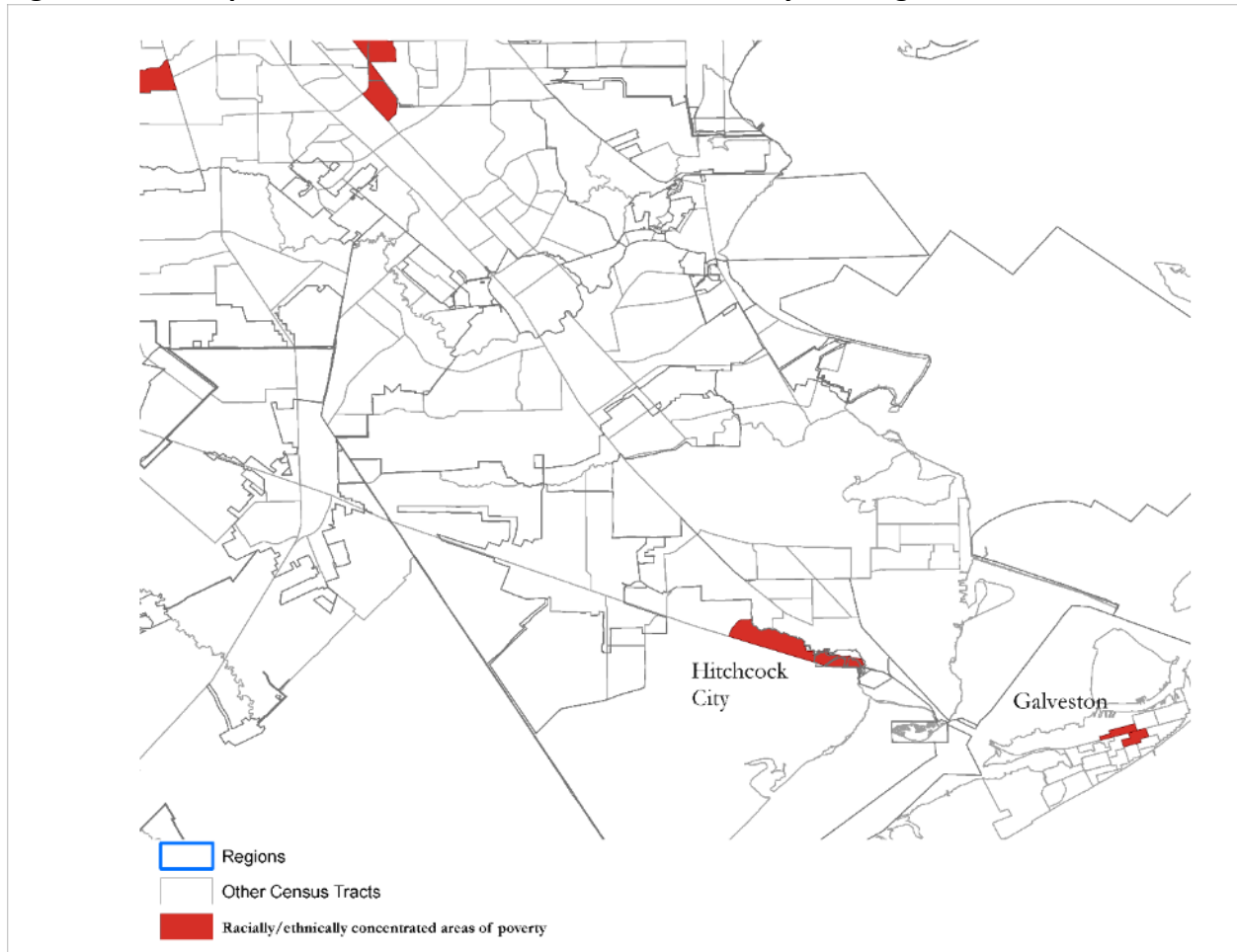
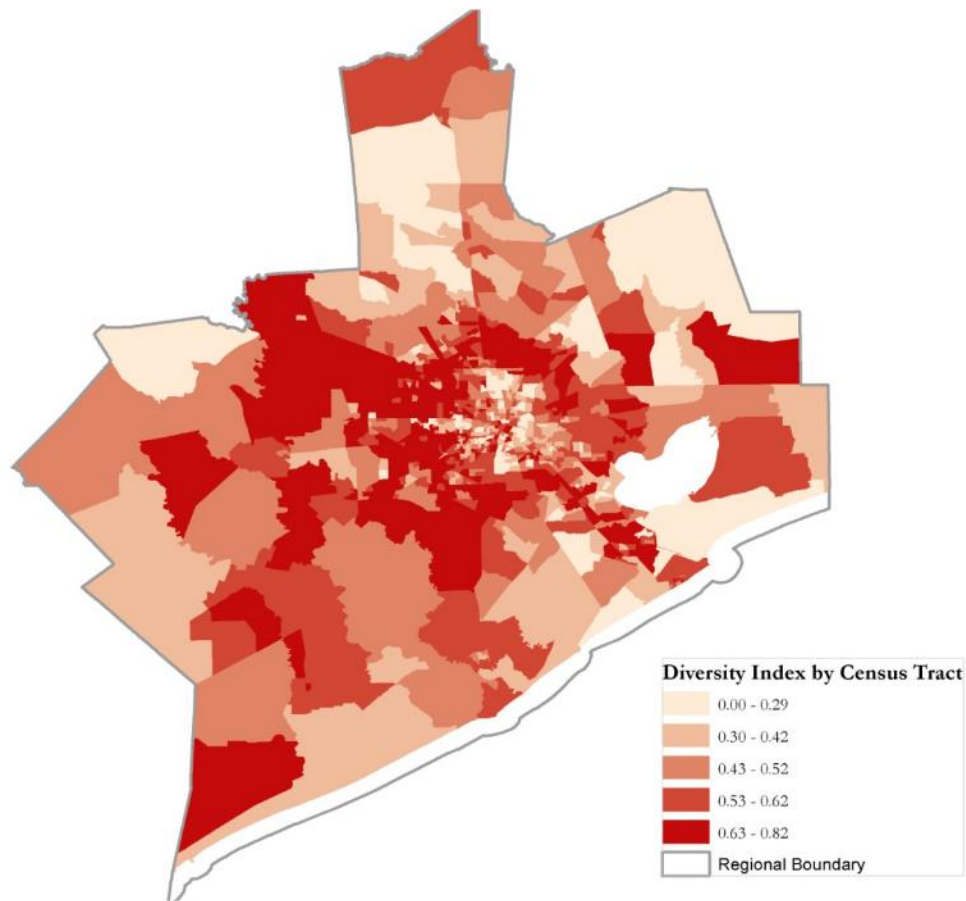


Figure 5-155 shows the Diversity Index by census tract for Region 6.



**Figure 5-155: Diversity Index, Region 6, 2018**



The Diversity Index indicates that Houston has large areas of racial and ethnic concentrations throughout the urban core, including R/ECAPs. The more diversified areas are in the middle and outer rings around the city, as opposed to the downtown core, as well as in some outlying areas. Detailed tables of the diversity index by census tract can be found in Appendix E

### Household Characteristics

Figure 5-156 shows the family characteristics of Region 6 households.

**Figure 5-156: Household and Family Characteristics, Region 6, 2012 to 2016**

	<b>Texas</b>	<b>Region 6</b>
Total Households	9,289,554	2,280,793
Average Household Size	2.84	2.87
Percent of Households with a Minor	37.6%	39.2%
Total Family Households	6,405,049	1,603,867
Average Family Household Size	3.44	3.47
Average Non-Family Household Size	1.28	1.25

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 6 household characteristics closely mirror those of the rest of the state. Region 6 has a slightly higher rate of households with a minor than other parts of the state, but slightly lower percentages of male- and female-headed households with a minor. The region also has a larger than average family size, explaining some of the population growth.

**Income**

Figure 5-157 displays the household income by race and ethnicity for Region 6. For both Hispanic and Black or African American households 36% are at or below 50% AMFI, while only about 15% of White households are at or below 50% AMFI and more than 70% of White households are at or above 80% AMFI. Region 6 experiences an income gap along racial and ethnic lines.

**Figure 5-157: Household Income Category by Race and Ethnicity, Region 6, 2010 to 2014**

	Texas	Region 6	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	13.2%	7.9%	21.3%	10.1%	16.6%	23.1%	14.1%	17.7%
VLI	12.2%	12.2%	7.9%	14.7%	8.6%	8.7%	16.2%	11.9%	18.6%
LI	16.8%	16.3%	12.9%	18.5%	13.1%	10.9%	29.5%	15.5%	21.5%
MI	9.5%	9.2%	8.3%	10.1%	8.0%	10.7%	6.9%	7.4%	10.6%
Greater than 100 Percent AMFI	48.5%	49.0%	62.9%	35.4%	60.2%	53.1%	24.2%	51.1%	31.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

**Disability**

Region 6, along with Regions 3 and 7, has the lowest rates of disability among the civilian non-institutionalized population at less than 10%. This is likely due to these regions having large Metro areas, where rates of disability are lower. In addition, Region 6 has a younger population, which is statistically less likely to have a disability. Only 9.6% of the Metro population has a disability, while 12.8% of the Non-Metro population has a disability.

Figure 5-158 shows prevalence of disability by disability type in Region 6, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. For the region as a whole and in Metro counties there is a lower rate of every type of disability compared to statewide rates.

**Figure 5-158: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 6, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Civilian Non-Institutionalized Population	26,478,868	6,582,191	6,431,084	151,107
Population With a Disability	3,083,141	638,937	619,592	19,345
Percent of Population with a Disability	11.6%	9.7%	9.6%	12.8%
Percent of Population with a Hearing Difficulty	3.4%	2.6%	2.6%	3.9%
Percent of Population with a Vision Difficulty	2.5%	2.0%	2.0%	2.7%
Percent of Population with a Cognitive Difficulty	4.3%	3.5%	3.5%	3.8%
Percent of Population with an Ambulatory Difficulty	6.1%	5.0%	5.0%	7.0%
Percent of Population with a Self-Care Difficulty	2.4%	2.0%	2.0%	2.4%
Percent of Population with an Independent Living Difficulty	3.9%	3.4%	3.4%	4.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-159 shows the percent of the civilian non-institutionalized population with a disability in Region 6 by gender and age. Lower rates of disability in Region 6 compared to the state and to other regions are reflected in lower rates of disability among both men and women and among children.

**Figure 5-159: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 6, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Percent of Population with a Disability	11.6%	9.7%	9.6%	12.8%
Percent of Males with a Disability	11.5%	9.4%	9.4%	12.9%
Percent of Female with a Disability	11.8%	10.0%	9.9%	12.7%
Percent of Minors With a Disability	4.2%	3.5%	3.5%	4.0%
Percent of Children Under Age 5 with a Disability	0.8%	0.7%	0.7%	1.1%
Percent of Children Aged 5-17 with a Disability	5.5%	4.6%	4.6%	5.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-160 shows the percent of civilian non-institutionalized population with a disability in Region 6 by race/ethnicity. Lower rates of disability in Region 6 compared to the state and to other regions are reflected in lower rates of disability across most races and ethnicities in the Region.

**Figure 5-160: Percent of Civilian Non-Institutionalized Population with Disability by Race/Ethnicity, Region 6, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Population	11.6%	9.7%	9.6%	12.8%
White	11.9%	9.6%	9.5%	12.3%
Black or African American	13.4%	12.7%	12.6%	16.2%
American Indian or Alaskan Native	15.8%	12.9%	12.8%	14.4%
Asian	5.7%	6.1%	6.1%	2.5%
Hawaiian or Other Pacific Islander	8.5%	6.6%	6.7%	0.0%
Some Other Race	9.2%	7.0%	6.9%	14.4%
Two or More Races	11.1%	9.7%	9.7%	9.7%
Hispanic or Latino	9.5%	6.8%	6.7%	7.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

Region 6 has slightly lower rates of poverty than the state. Figure 5-161 shows the prevalence of poverty in Region 6 by poverty level.

**Figure 5-161: Poverty Rates by Poverty Level, Region 6, 2012 to 2016**

	<b>Texas</b>	<b>Region 6</b>
Total Population for Whom Poverty Status is Determined	26,334,005	6,544,890
Below 100% Poverty (Overall Poverty Rate)	16.7%	15.4%
Below 50% of Poverty	7.0%	6.2%
Below 150% of Poverty	27.3%	25.3%
Below 200% of Poverty	37.2%	34.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-162 shows the percent of individuals below the poverty line (100% poverty) in Region 6 by age, gender and race/ethnicity. With the exception of Hawaiian and Other Pacific Islanders, Region 6 is slightly lower than statewide rates of poverty across age, gender and race/ethnicity.

**Figure 5-162: Poverty Rates by Age, Gender and Race/Ethnicity, Region 6, 2012 to 2016**

	Texas	Region 6
Total Population for Whom Poverty Status is Determined	26,334,005	6,544,890
Below 100% Poverty (Overall Poverty Rate)	16.7%	15.4%
Metro County	16.4%	15.3%
Non-Metro County	18.7%	20.4%
Under 18	23.9%	22.5%
Male	15.2%	14.0%
Female	18.2%	16.9%
White	15.5%	13.8%
Black or African American	22.6%	20.7%
American Indian and Alaskan Native	21.2%	20.6%
Asian	11.1%	10.2%
Hawaiian and Other Pacific Islander	14.0%	16.9%
Some Other Race	24.4%	23.7%
Two or More Races	17.2%	14.8%
Hispanic or Latino	24.2%	22.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-163 shows the share of job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Houston-The Woodlands-Sugarland, TX. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. An equal share of job holders working in the Houston-The Woodlands-Sugarland CBSA drive less than 10 miles and 10 to 24 miles to work, this may be due to the Houston-The Woodlands-Sugarland CBSA having such a large area and the ability to live closer to work due to the lack of zoned residential versus employment areas.

**Figure 5-163: Share of Job Counts by Distance between Work Census Block and Home Census Block, Houston-The Woodlands-Sugar Land CBSA, TX, 2015**

	Count	Share
Total All Jobs	2,984,892	100.0%
Less than 10 miles	1,131,435	37.9%
10 to 24 miles	1,083,077	36.3%
25 to 50 miles	362,671	12.2%
Greater than 50 miles	407,709	13.7%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-164 shows the employment and living situation for individuals in each county of Region 6. Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it.

**Figure 5-164: Employment and Living Situations, Counties in Region 6, 2015**

<b>County</b>	<b>Employed in County &amp; Living Outside</b>	<b>Lived and Worked in County</b>	<b>Live in County and employed outside</b>	<b>Percent that Live in County and employed outside</b>
Austin	5,304	3,595	10,973	75.3%
Brazoria	54,611	48,310	102,511	68.0%
Chambers	8,073	3,111	15,906	83.6%
Colorado	3,761	3,363	6,277	65.1%
Fort Bend	112,624	70,695	245,078	77.6%
Galveston	46,028	54,844	87,784	61.5%
Harris	793,098	1,585,214	355,757	18.3%
Liberty	9,092	6,145	25,348	80.5%
Matagorda	5,170	5,537	11,500	67.5%
Montgomery	96,965	72,479	148,422	67.2%
Walker	18,279	9,894	11,651	54.1%
Waller	11,797	2,907	14,779	83.6%
Wharton	7,485	8,115	12,905	61.4%
<b>Total</b>	<b>1,172,287</b>	<b>1,874,209</b>	<b>1,048,891</b>	<b>35.9%</b>

Source: On the map data, 2015, with out of state employment data excluded.

There is a high degree of mobility in and out of counties in Region 6. The City of Houston, which extends into Fort Bend, Montgomery, and Harris counties, is the job center of the region. These three counties alone account for more than 2.7 million jobs in Region 6, almost 90% of the jobs in the entire region. Figure 5-165 shows the mean travel time to work for counties in Region 6.

**Figure 5-165: Mean Travel Time to Work, Counties in Region 6, 2012 to 2016**

<b>County</b>	<b>Mean travel time to work (minutes)</b>
Austin	30.3
Brazoria	29.4
Chambers	29.2
Colorado	19.5
Fort Bend	32.6
Galveston	27.8
Harris	28.6
Liberty	35.6
Matagorda	23.9
Montgomery	32.5
Walker	25.5
Waller	31.6
Wharton	22.6

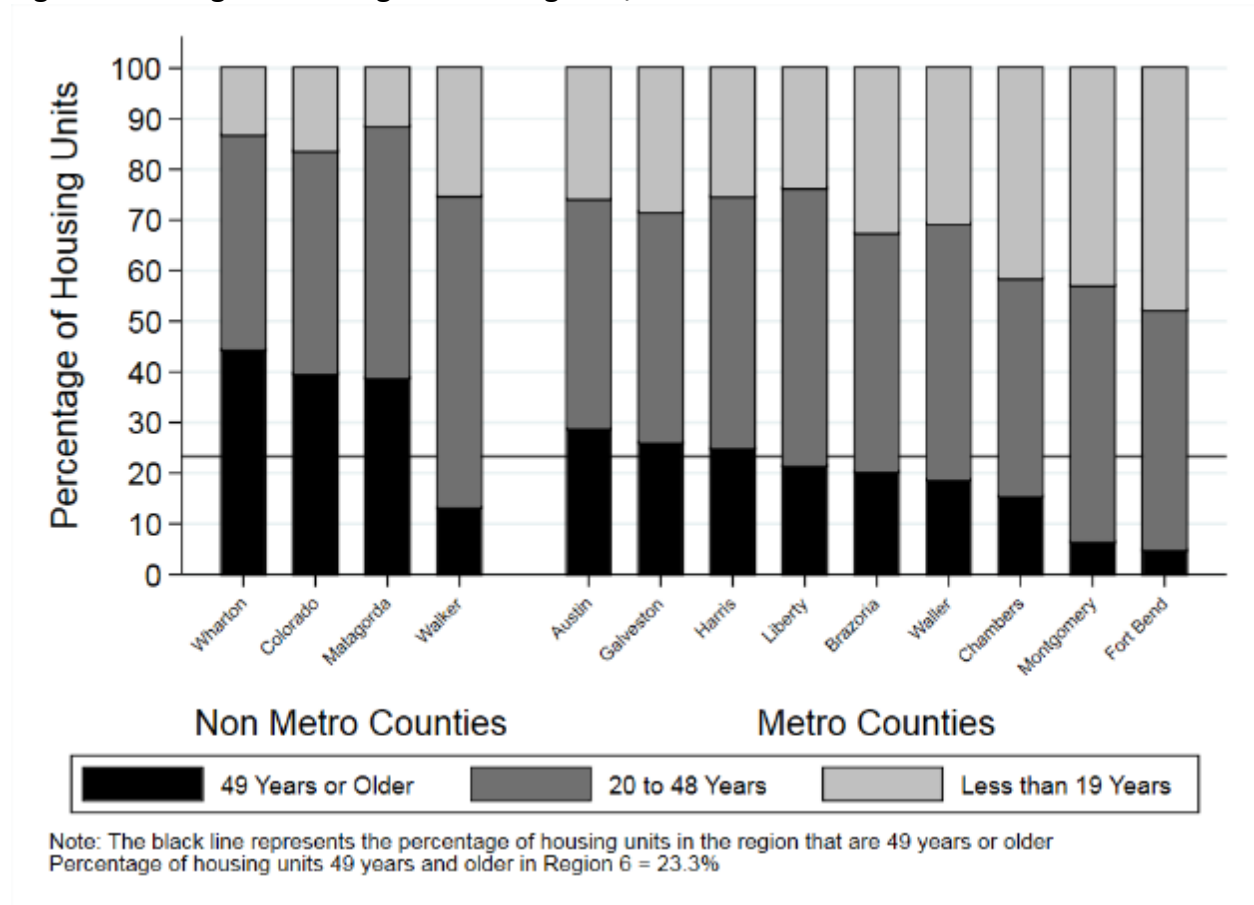
Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

High mean commute times in Region 6 are likely due to high density in the region along with the centrality of jobs in the Houston area.

### Housing Profile

Figure 5-166 and Figure 5-167 show the age of the housing stock in Region 6.

**Figure 5-166: Age of Housing Stock in Region 6, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

The area around Houston has experienced explosive growth within Metro counties, though this growth in construction over the last 18 years has not yet reached all of the Non-Metro counties in Region 6.

**Figure 5-167: Age of Housing Stock in Region 6, By County, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Austin	28.8%	45.4%	25.8%
Brazoria	20.2%	47.2%	32.6%
Chambers	15.4%	43.0%	41.6%
Colorado	39.6%	44.0%	16.4%
Fort Bend	4.8%	47.5%	47.8%
Galveston	26.0%	45.6%	28.4%
Harris	24.9%	49.8%	25.4%
Liberty	21.4%	54.9%	23.7%
Matagorda	38.8%	49.7%	11.5%
Montgomery	6.4%	50.7%	42.9%
Walker	13.2%	61.6%	25.2%
Waller	18.7%	50.6%	30.7%
Wharton	44.4%	42.5%	13.2%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-168 shows households in Region 6 experiencing one or more housing problems. Region 6 has the second highest rates of housing problems for ELI and VLI renter households behind Region 7 and the third highest rates for ELI, VLI, LI, and MI owner households behind Region 7 and Region 3. Housing problems are more prevalent in Non-Metro counties of Region 6 for ELI owner households but less prevalent for Non-Metro ELI renter households.

**Figure 5-168: Percent of Households with One or More Housing Problems, Region 6, 2010 to 2014**

Households with One or More Housing Problems	Metro	Non-Metro	Region 6 Total	State Total
ELI Renter Households	82.8%	70.7%	82.4%	79.4%
VLI Renter Households	84.6%	79.4%	84.5%	82.7%
LI Renter Households	49.6%	37.3%	49.3%	52.1%
MI Renter Households	24.1%	7.9%	23.8%	24.2%
Renter Households with Incomes Greater than 100% AMFI	9.0%	2.1%	8.8%	8.5%
Percent Total Renter Households	49.0%	43.9%	48.8%	48.2%
ELI Owner Households	74.8%	75.5%	74.9%	73.6%
VLI Owner Households	62.2%	45.1%	61.6%	57.2%
LI Owner Households	48.8%	28.5%	48.2%	42.8%
MI Owner Households	32.8%	15.7%	32.2%	29.0%
Owner Households with Incomes Greater than 100% AMFI	9.2%	7.5%	9.2%	9.1%
Percent Total Owner Households	26.0%	21.4%	25.9%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.



## Regional Analysis

Rates of housing problems among MI and above renter households are particularly low in Non-Metro counties of Region 6. Figure 5-169 shows renter and owner households in Region 6 lacking complete plumbing or kitchen facilities.

**Figure 5-169: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 6, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 6 Total</b>	<b>State Total</b>
ELI Renter Households	2.4%	2.1%	2.4%	2.7%
VLI Renter Households	2.0%	1.3%	2.0%	2.3%
LI Renter Households	1.7%	1.5%	1.7%	1.8%
MI Renter Households	1.2%	0.2%	1.2%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.0%	0.7%	1.0%	1.2%
Percent Total Renter Households	1.7%	1.4%	1.7%	1.9%
ELI Owner Households	2.1%	2.1%	2.1%	2.6%
VLI Owner Households	1.2%	1.5%	1.2%	1.6%
LI Owner Households	0.8%	0.6%	0.7%	0.8%
MI Owner Households	0.5%	1.1%	0.5%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.4%	0.3%	0.4%	0.4%
Percent Total Owner Households	0.7%	0.7%	0.7%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Region 6 has low rates of units lacking plumbing or kitchen facilities compared to other regions, particularly in Non-Metro counties. Figure 5-170 shows renter and owner households in Region 6 that are cost burdened.

**Figure 5-170: Percent of Households Experiencing Cost Burden, Region 6, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 6 Total</b>	<b>State Total</b>
ELI Renter Households	80.7%	69.5%	80.3%	77.3%
VLI Renter Households	79.4%	76.6%	79.3%	78.1%
LI Renter Households	41.2%	33.7%	41.1%	44.5%
MI Renter Households	16.8%	6.3%	16.6%	17.0%
Renter Households with Incomes Greater than 100% AMFI	4.2%	0.5%	4.2%	4.0%
Percent Total Renter Households	43.7%	41.8%	43.7%	43.3%
ELI Owner Households	72.0%	73.7%	72.1%	70.9%
VLI Owner Households	57.9%	39.7%	57.3%	52.8%
LI Owner Households	43.2%	23.4%	42.5%	37.5%
MI Owner Households	27.9%	12.6%	27.4%	24.3%
Owner Households with Incomes Greater than 100% AMFI	7.3%	5.4%	7.3%	6.9%
Percent Total Owner Households	23.1%	18.5%	23.0%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Region 6 has high rates of cost burden compared to other regions, particularly among owner households. Region 6, like Region 3, has high rates of cost burden for ELI and VLI renter households and all owner households compared to other regions. The majority of ELI and VLI households in Region 6 experience housing cost burden. Figure 5-171 shows renter and owner households in Region 6 that are overcrowded.

**Figure 5-171: Percent of Households Experiencing Overcrowding, Region 6, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 6 Total</b>	<b>State Total</b>
ELI Renter Households	11.9%	2.6%	11.6%	10.0%
VLI Renter Households	12.2%	6.3%	12.1%	10.7%
LI Renter Households	8.3%	3.1%	8.1%	7.9%
MI Renter Households	6.4%	1.2%	6.3%	6.2%
Renter Households with Incomes Greater than 100% AMFI	3.9%	0.8%	3.8%	3.6%
Percent Total Renter Households	8.3%	2.8%	8.2%	7.5%
ELI Owner Households	5.9%	3.0%	5.8%	5.5%
VLI Owner Households	6.7%	5.6%	6.6%	6.1%
LI Owner Households	6.4%	4.5%	6.4%	5.8%
MI Owner Households	4.7%	2.7%	4.7%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.5%	1.8%	1.6%	1.8%
Percent Total Owner Households Overcrowded	3.2%	2.8%	3.2%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Rates of overcrowding in Region 6 are slightly higher than state rates. Within Region 6, households in Metro counties with incomes less than or equal to 100% AMFI experience overcrowding at higher rates than households in Non-Metro counties. Renter households in Non-Metro counties have low rates of overcrowding compared to other regions, particularly ELI households. However, very high rates for ELI and VLI renter households in Metro counties, where the vast majority of Region 6’s population lives, give Region 6 an overall high rate for ELI and VLI renter households. Figure 5-172 shows average housing costs in Region 6.

**Figure 5-172: Average Housing Costs, Region 6, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$1,142
Average Monthly Rent	\$891

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Along with fast growth and a denser population, Region 6 has some of the highest average housing costs in the state. Figure 5-173 shows the number of bedrooms in renter and owner occupied households in Region 6.

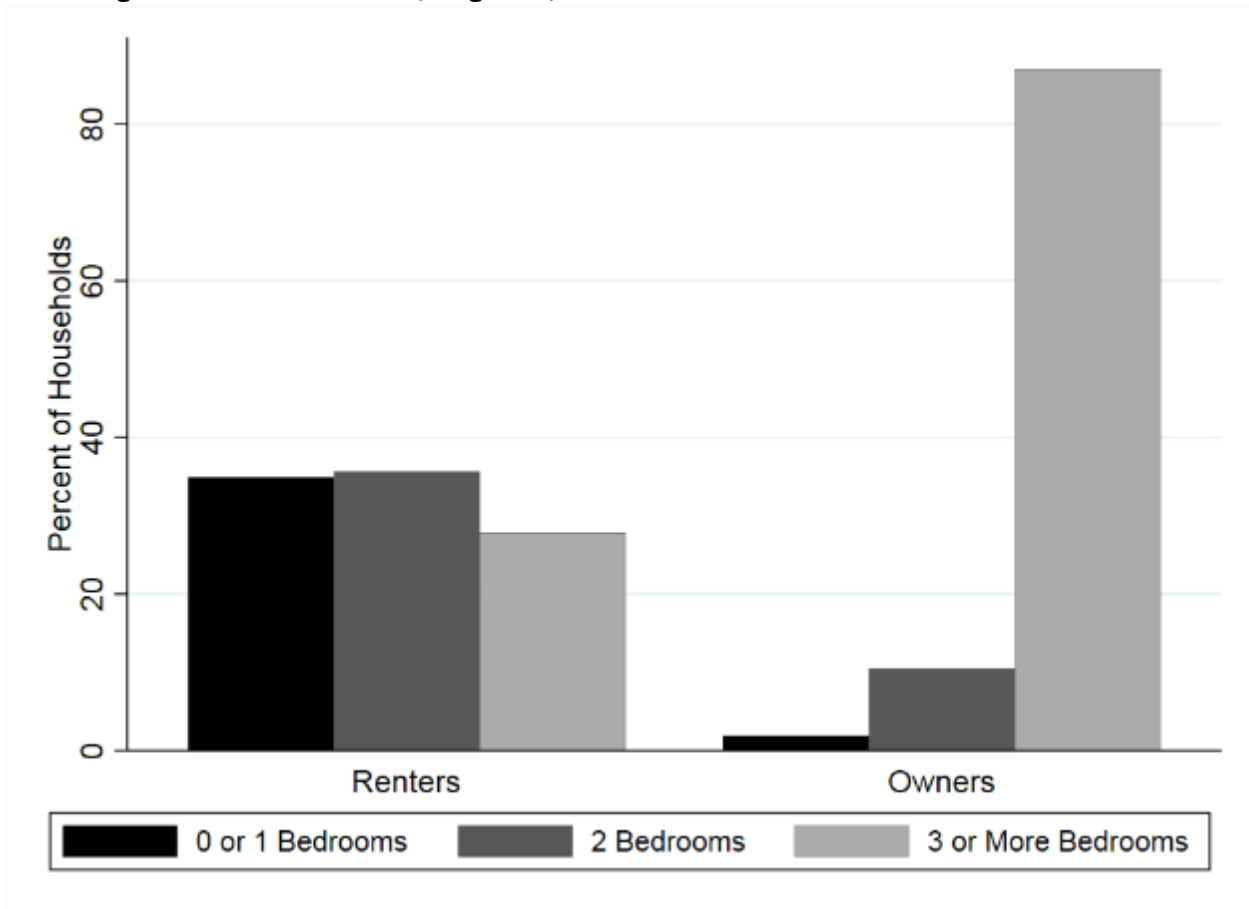
**Figure 5-173: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 6, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	822,650	35.5%	36.2%	28.3%
Owner Occupied	1,323,299	1.9%	10.5%	87.6%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-174 is a visual representation of the regional data from Figure 5-173. The overall tenure and unit size characteristics of Region 6 are relatively close to the characteristics for the state as a whole. Region 6 has the second highest percentage of renter occupied units with 0 or 1 bedrooms, behind Region 3, and the second lowest percentage of renter occupied 3 or more bedroom units, behind Region 7. Of total occupied units in Region 6, 13.6% are renter occupied and consist of 0 or 1 units, the third highest percentage among all regions. This would suggest it may be more difficult for larger households, such as families, to find rental units. Despite having the second highest percentage of owner occupied 3 or more bedroom units, the severe lack of renter occupied 3 or more bedroom units gives Region 6 the second lowest percentage of total units with 3 or more bedrooms, again behind Region 7.

**Figure 5-174: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 6, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

High rates of overcrowding among renter households aligns with the distribution of unit sizes in Region 6. There are very few owner occupied units with fewer than 3 bedrooms, while rental units are heavily concentrated in zero to two bedroom units. Figure 5-175 maps the active multifamily properties in Region 6 participating in TDHCA programs.

**Figure 5-175: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 6, 2018**

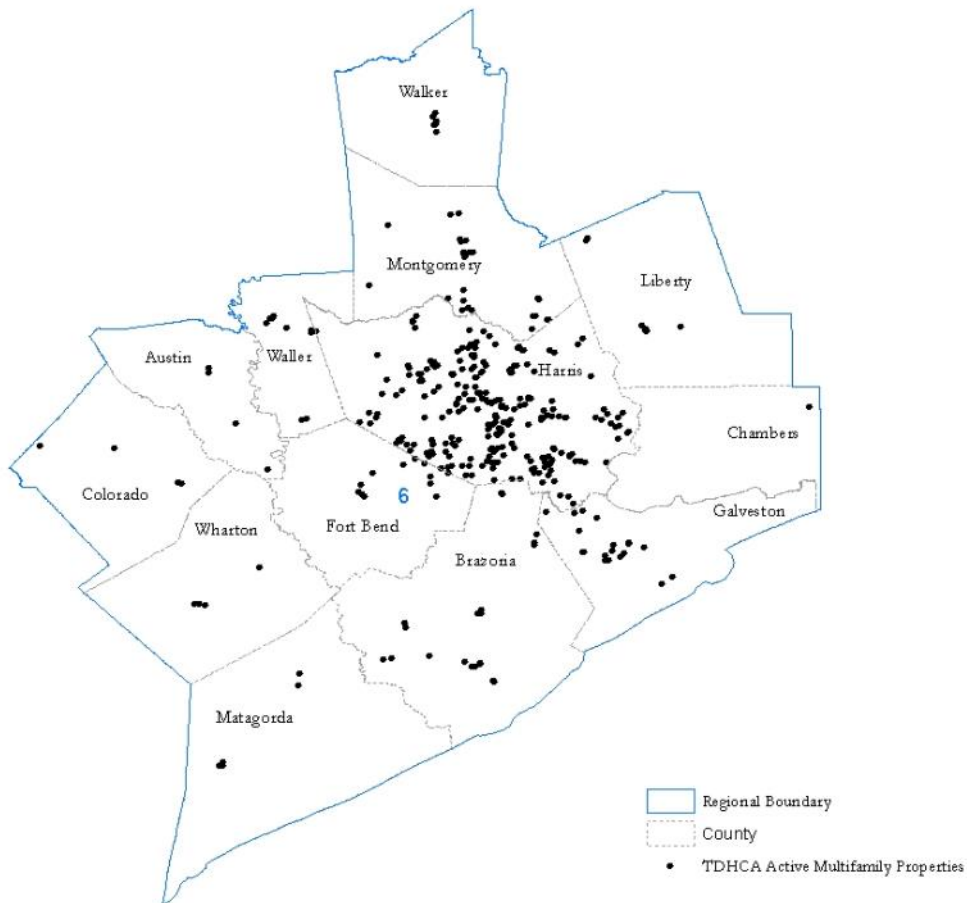


Figure 5-176 shows the number of active multifamily properties participating in TDHCA programs by county in Region 6. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-176: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 6, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Austin	4	150	150
Brazoria	29	2,550	2,439
Chambers	1	32	32
Colorado	4	158	158
Fort Bend	20	3,003	2,683
Galveston	26	3,350	3,132
Harris	285	50,377	47,660
Liberty	10	536	476
Matagorda	5	226	222
Montgomery	30	4,297	4,124
Walker	9	619	562
Waller	9	491	488
Wharton	4	232	224
<b>Total</b>	<b>436</b>	<b>66,021</b>	<b>62,350</b>

Source: TDHCA, Central Database, data pull from June 2018.

Harris County, which contains the majority of the City of Houston, has the largest population in Region 6 and has the greatest number of active multifamily properties participating in TDHCA programs. Houston's boundaries extend into Fort Bend and Montgomery counties, which also have a large number of multifamily properties participating in TDHCA programs. Galveston and Brazoria counties, which also have a large number of properties participating in TDHCA programs, are just south of Houston and capture many of its suburbs and additional large population centers such as Pearland, League City, and Galveston.

## Region 7—“Capital”

**Point of Reference Cities:** Austin, Georgetown, Round Rock, Bastrop, San Marcos

### Geo-Demographic Background

The Capital region is the fastest growing region in the state due to a robust technology industry, state government, and environmental and cultural amenities. The State Capitol, as well as the state’s flagship university, The University of Texas, are both located in Austin. The region is home to geographically appealing highland lakes, parks, and the eastern edge of Texas Hill Country. The rapidly growing Hill Country region is becoming a favorite place for retirees, second homes, wine vineyards, outdoor recreation, and tourism.

The recent demand to live in Austin’s urban core has caused property values to spike and has created a challenge in affordable housing development. Many neighborhoods in south and east Austin are gentrifying quickly, further exacerbating housing challenges for the historically minority populations living in those areas. Figure 5-177 shows the counties of TDHCA Region 7.

**Figure 5-177: State of Texas’ Region 7 Counties**

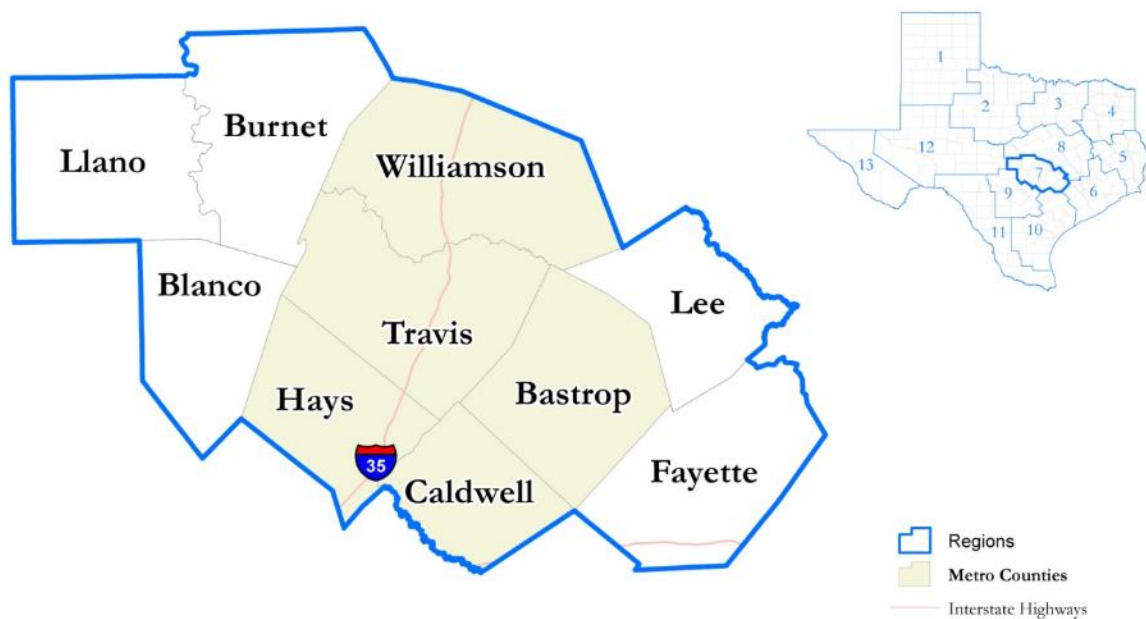


Figure 5-178 displays the population composition of Region 7 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040 and 2050.

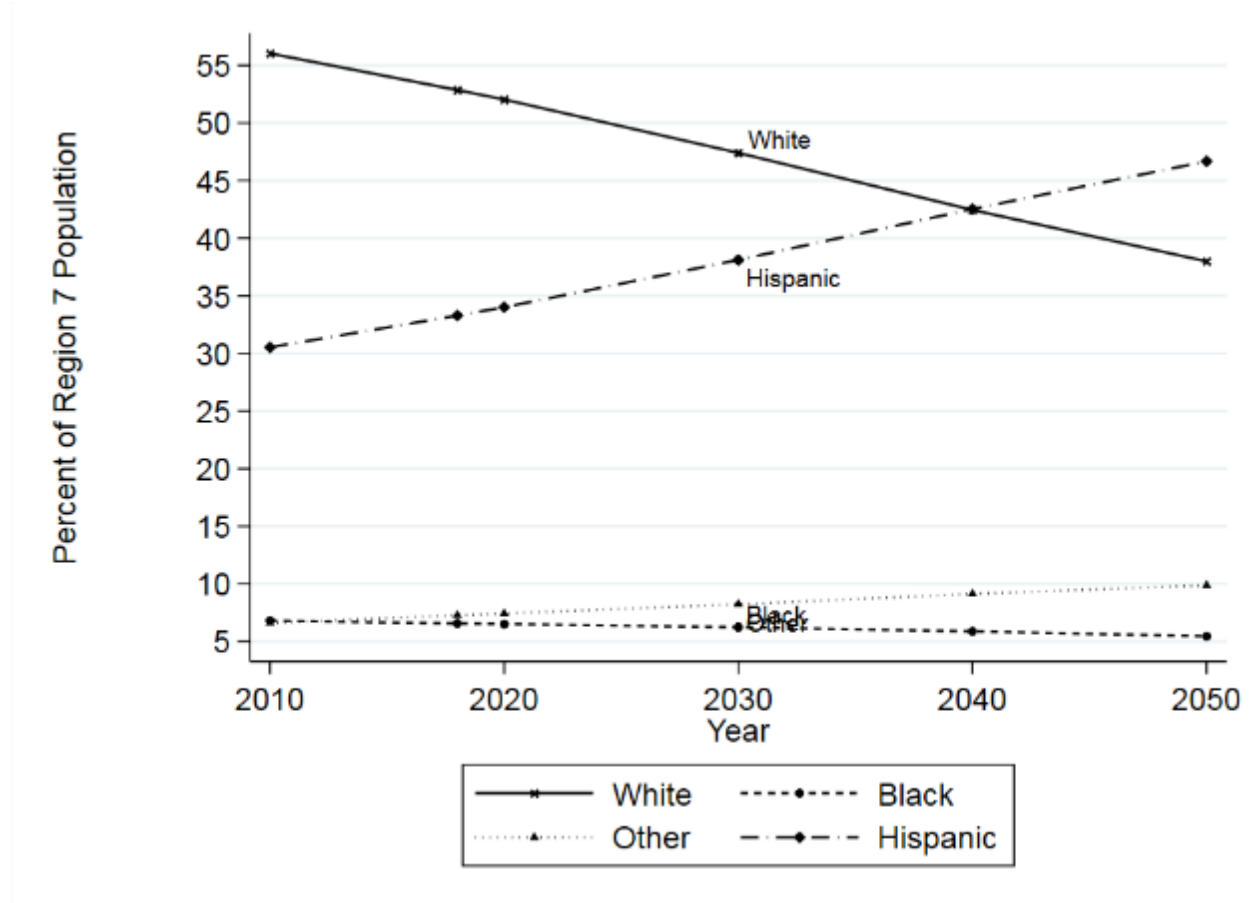
**Figure 5-178: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 7, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	56.0%	6.8%	6.6%	30.5%	1,830,003
2018	52.9%	6.6%	7.3%	33.3%	2,125,179
2020	52.0%	6.5%	7.4%	34.0%	2,200,953
2030	47.4%	6.2%	8.2%	38.1%	2,573,614
2040	42.5%	5.9%	9.1%	42.5%	2,967,407
2050	38.0%	5.5%	9.9%	46.7%	3,398,682

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 7 has a much lower population of African Americans as compared to the state as a whole. While the Capital region is currently majority White, Non-Hispanic, that is projected to change within the next 20 years, when the area is anticipated to be nearly evenly split between White, Non-Hispanic residents and Hispanic or Latino residents. High population growth rates are predicted to continue and even increase their pace. Figure 5-179 is a visual representation of Figure 5-178.

**Figure 5-179: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 7, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.



### Race and Ethnicity

Figure 5-180 shows the R/ECAPs in Region 7. Figure 5-181 shows the R/ECAPs in Austin and San Marcos. A list of the census tracts designated as R/ECAPS is available in Appendix Das well.

**Figure 5-180: Map of R/ECAPS, Region 7, 2018**

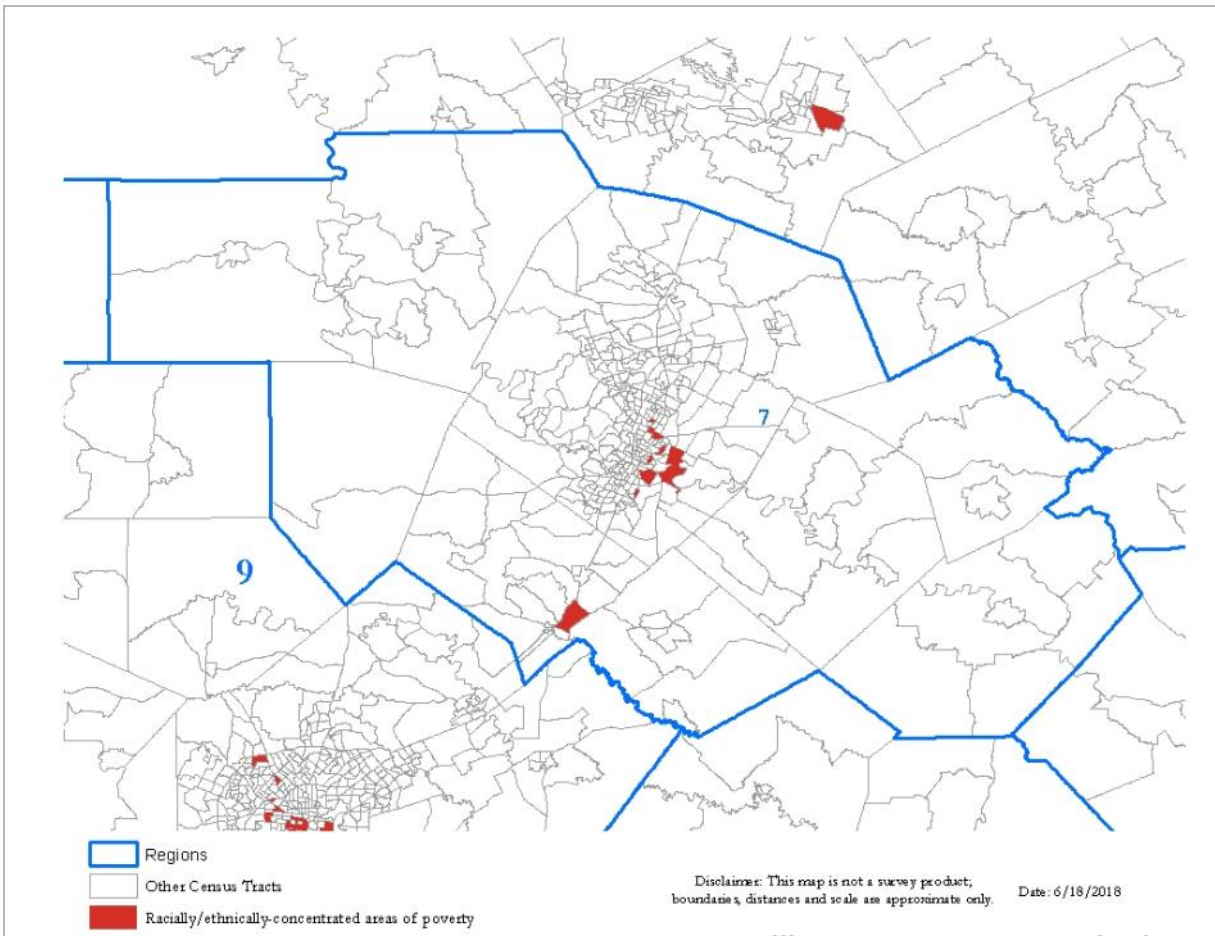


Figure 5-181: Map of R/ECAPS, Austin and San Marcos, Region 7, 2018

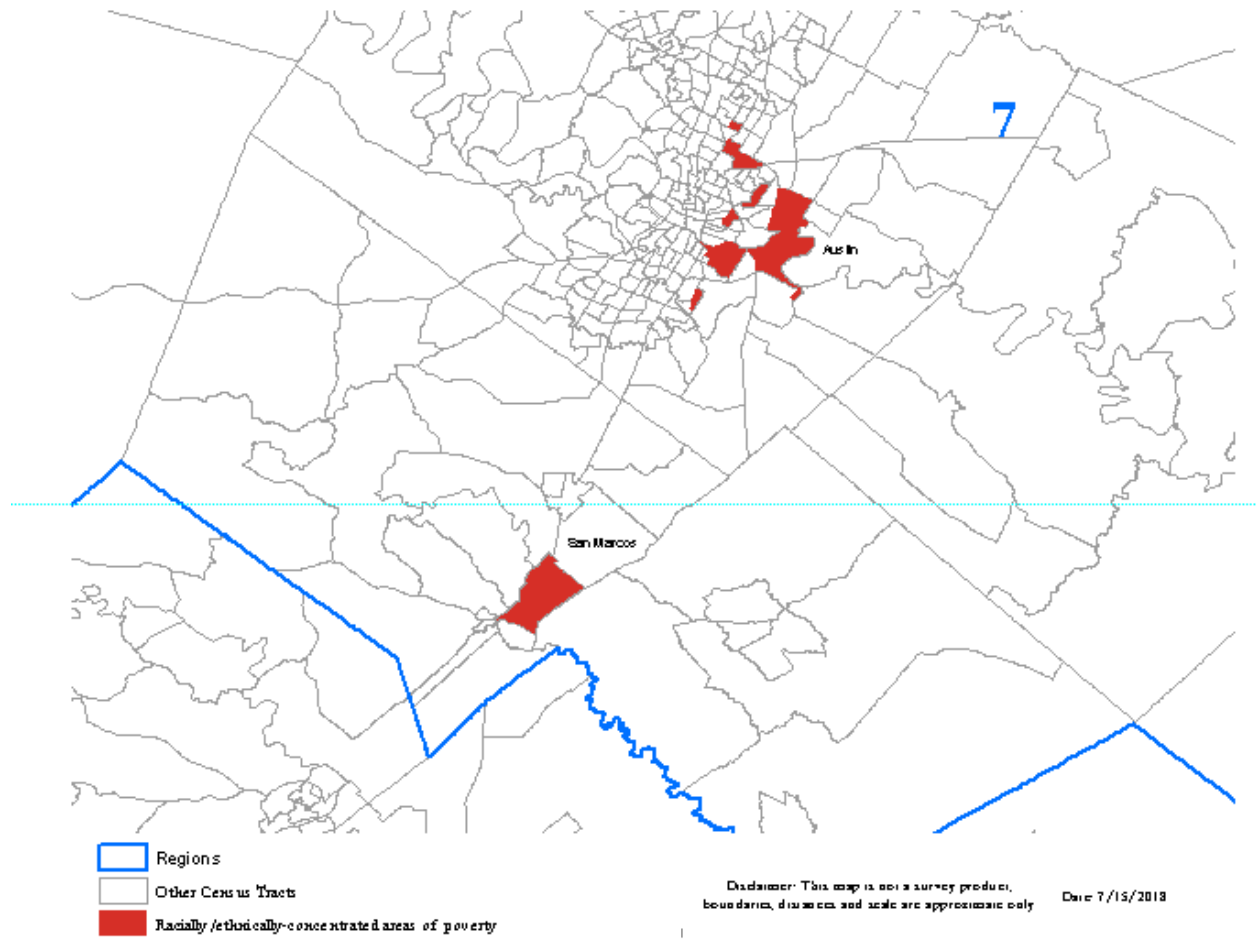
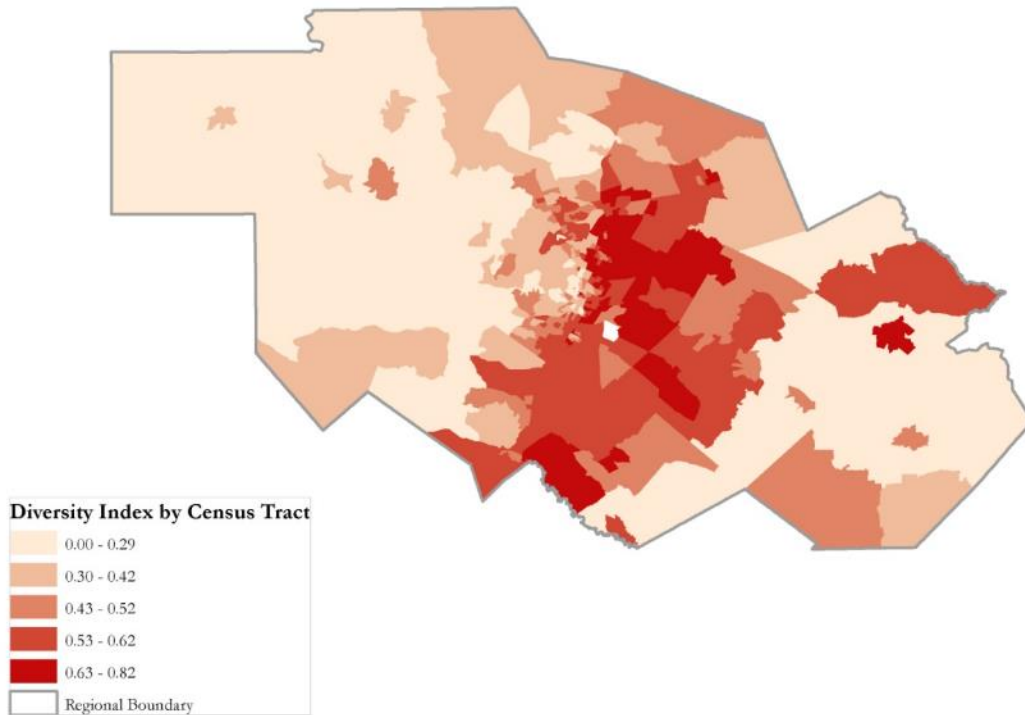


Figure 5-182 shows the Diversity Index by census tract for Region 7.

**Figure 5-182: Diversity Index, Region 7, 2018**



Detailed tables of the diversity index by census tract can be found in Appendix E

### Household Characteristics

Figure 5-183 shows the family characteristics of households in Region 7.

**Figure 5-183: Household and Family Characteristics, Region 7, 2012 to 2016**

	Texas	Region 7
Total Households	9,289,554	750,902
Average Household Size	2.84	2.69
Percent of Households with a Minor	37.6%	32.8%
Total Family Households	6,405,049	468,552
Average Family Household Size	3.44	3.34
Average Non-Family Household Size	1.28	1.44

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 7 has the largest average non-family household size, suggesting that non-related persons might be living together in order to bring down high housing costs, an expected housing trend in communities with a high number of university students. In all other categories, Region 7 values

are slightly lower than state figures. The average family household size is the median household size of all regional figures.

**Income**

Figure 5-184 displays household income category by race and ethnicity for Region 7. In Region 7, White and Asian households are both overrepresented above the AMFI, with close to 60% of both White and Asian households at or above the AMFI. African American and Hispanic households however are more clustered below the median AMFI, though not quite as concentrated at the very lowest incomes as in other regions.

**Figure 5-184: Household Income Category by Race and Ethnicity, Region 7, 2010 to 2014**

	Texas	Region 7	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	12.4%	8.9%	21.1%	13.4%	12.2%	7.2%	18.2%	18.9%
VLI	12.2%	10.8%	8.3%	13.8%	9.0%	6.3%	19.1%	11.5%	17.4%
LI	16.8%	16.3%	14.5%	19.3%	10.2%	20.2%	28.7%	18.5%	21.4%
MI	9.5%	9.8%	9.8%	11.0%	6.8%	8.4%	6.7%	8.1%	10.1%
Greater than 100 Percent AMFI	48.5%	50.7%	58.6%	34.9%	60.6%	52.9%	38.3%	43.7%	32.2%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

**Disability**

Region 7, along with Regions 3 and 6, has the lowest rates of disability among the civilian non-institutionalized population at less than 10%. This is likely due to these regions having large Metro areas, where rates of disability are lower. Only 9.3% of the Metro population in Region 7 has a disability, while 18.4% of the Non-Metro population has a disability. If services and amenities for persons with disabilities are concentrated in the Metro areas, this could be a burden to those living in the outlying regions.

Figure 5-185 shows prevalence of disability by disability type in Region 7, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. For the region as a whole and in Metro counties there is a lower rate of every type of disability compared to statewide rates.

**Figure 5-185: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 7, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Civilian Non-Institutionalized Population	26,478,868	2,040,536	1,925,402	115,134
Population With a Disability	3,083,141	199,726	178,590	21,136
Percent of Population with a Disability	11.6%	9.8%	9.3%	18.4%
Percent of Population with a Hearing Difficulty	3.4%	2.9%	2.7%	5.9%
Percent of Population with a Vision Difficulty	2.5%	1.8%	1.7%	3.3%
Percent of Population with a Cognitive Difficulty	4.3%	3.7%	3.6%	6.6%
Percent of Population with an Ambulatory Difficulty	6.1%	4.7%	4.4%	9.4%
Percent of Population with a Self-Care Difficulty	2.4%	1.8%	1.7%	3.3%
Percent of Population with an Independent Living Difficulty	3.9%	3.1%	3.0%	5.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-186 shows the percent of the civilian non-institutionalized population with a disability in Region 7 by gender and age. Lower rates of disability in Region 7 compared to the state and to other regions are reflected in lower rates of disability among both men and women and among children.

**Figure 5-186: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 7, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Percent of Population with a Disability	11.6%	9.8%	9.3%	18.4%
Percent of Males with a Disability	11.5%	9.7%	9.2%	18.3%
Percent of Female with a Disability	11.8%	9.9%	9.4%	18.4%
Percent of Minors With a Disability	4.2%	4.0%	3.9%	5.4%
Percent of Children Under Age 5 with a Disability	0.8%	0.7%	0.7%	0.2%
Percent of Children Aged 5-17 with a Disability	5.5%	5.2%	5.1%	7.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-187 shows the percent of civilian non-institutionalized population with a disability in Region 7 by race/ethnicity. Lower rates of disability in Region 7 compared to the state and to other regions are reflected in lower rates of disability across most races and ethnicities in the Region.

**Figure 5-187: Percent of Civilian Non-Institutionalized Population with Disability by Race/Ethnicity, Region 7, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	9.8%	9.3%	18.4%
White	11.9%	9.9%	9.3%	18.6%
Black or African American	13.4%	13.0%	12.8%	17.9%
American Indian or Alaskan Native	15.8%	12.6%	12.3%	17.8%
Asian	5.7%	4.5%	4.5%	5.2%
Hawaiian or Other Pacific Islander	8.5%	4.2%	4.2%	0.0%
Some Other Race	9.2%	8.0%	7.9%	11.9%
Two or More Races	11.1%	11.4%	11.2%	21.4%
Hispanic or Latino	9.5%	7.7%	7.7%	10.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

Region 7 has lower rates of poverty than the state. After Region 12, Region 7 has the lowest overall poverty rate. Figure 5-188 shows the prevalence of poverty in Region 7 by poverty level.

**Figure 5-188: Poverty Rates by Poverty Level, Region 7, 2012 to 2016**

	Texas	Region 7
Total Population for Whom Poverty Status is Determined	26,334,005	2,016,278
Below 100% Poverty (Overall Poverty Rate)	16.7%	13.3%
Below 50% of Poverty	7.0%	6.2%
Below 150% of Poverty	27.3%	21.3%
Below 200% of Poverty	37.2%	29.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-189 shows the percent of individuals below the poverty line (100% poverty) in Region 7 by age, gender and race/ethnicity. With the exception of Hawaiian and Other Pacific Islanders, Region 6 is slightly lower than statewide rates of poverty across age, gender and race/ethnicity. Region 7 has the lowest rate of poverty among persons who identify as two or more races as well as among American Indians and Alaskan Natives.

**Figure 5-189: Poverty Rates by Age, Gender and Race/Ethnicity, Region 7, 2012 to 2016**

	Texas	Region 7
Total Population for Whom Poverty Status is Determined	26,334,005	2,016,278
Below 100% Poverty (Overall Poverty Rate)	16.7%	13.3%
Metro County	16.4%	13.3%
Non-Metro County	18.7%	13.1%
Under 18	23.9%	17.4%
Male	15.2%	12.2%
Female	18.2%	14.3%
White	15.5%	12.3%
Black or African American	22.6%	20.2%
American Indian and Alaskan Native	21.2%	14.7%
Asian	11.1%	11.0%
Hawaiian and Other Pacific Islander	14.0%	19.1%
Some Other Race	24.4%	22.0%
Two or More Races	17.2%	12.6%
Hispanic or Latino	24.2%	20.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-190 shows the share of job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Austin-Round Rock, TX. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. The Austin-Round Rock CBSA has a greater percentage of job holders commuting less than 10 miles to work than other large CBSAs like Houston-The Woodlands-Sugarland and Dallas-Fort Worth-Arlington, but still has one in five job holders commuting more than 50 miles to work.

**Figure 5-190: Share of Job Counts by Distance between Work Census Block and Home Census Block, Austin-Round Rock CBSA, Region 7, 2015**

	Count	Share
Total All Jobs	956,883	100.0%
Less than 10 miles	419,431	43.8%
10 to 24 miles	273,139	28.5%
25 to 50 miles	67,716	7.1%
Greater than 50 miles	196,597	20.5%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-191 shows the employment and living situation for individuals in each county of Region 7. Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it. There is a high degree of mobility in and out of counties in Region 7. Jobs are centrally located in the city of Austin, with almost as many people coming into Travis County

for work as there are living in and working in the county. In every county except Travis County (Austin, TX), more people work outside of the county they reside in than live and work in the same county.

**Figure 5-191: Employment and Living Situations, Counties in Region 7, 2015**

County	Employed in County & Living Outside	Lived and Worked in County	Live in County and employed outside	Percent that Live in County and employed outside
Bastrop	7,674	7,367	25,700	77.7%
Blanco	2,115	1,161	2,494	68.2%
Burnet	6,261	5,773	11,752	67.1%
Caldwell	4,984	3,386	13,223	79.6%
Fayette	4,513	4,093	6,673	62.0%
Hays	35,674	21,671	58,278	72.9%
Lee	4,694	2,785	4,850	63.5%
Llano	2,586	2,028	4,909	70.8%
Travis	325,873	394,075	148,999	27.4%
Williamson	81,686	74,493	164,498	68.8%
Total	476,060	516,832	441,376	46.1%

Source: On the map data, 2015, with out of state employment data excluded.

Figure 5-192 shows the mean travel time to work for counties in Region 7. Average commute times do not vary widely across counties within the region. Most individuals have commutes that are less than 30 minutes. Somewhat higher mean commute times for counties surrounding Travis County (Austin, TX) in Region 7 is likely due to the centrality of job locations in the Austin area and is likely due to job holders commuting into the Austin area for work.

**Figure 5-192: Mean Travel Time to Work, Counties in Region 7, 2012 to 2016**

County	Mean travel time to work (minutes)
Bastrop	34.1
Blanco	28
Burnet	25.1
Caldwell	29.7
Fayette	22.4
Hays	29.8
Lee	26.9
Llano	24.9
Travis	25
Williamson	27.4

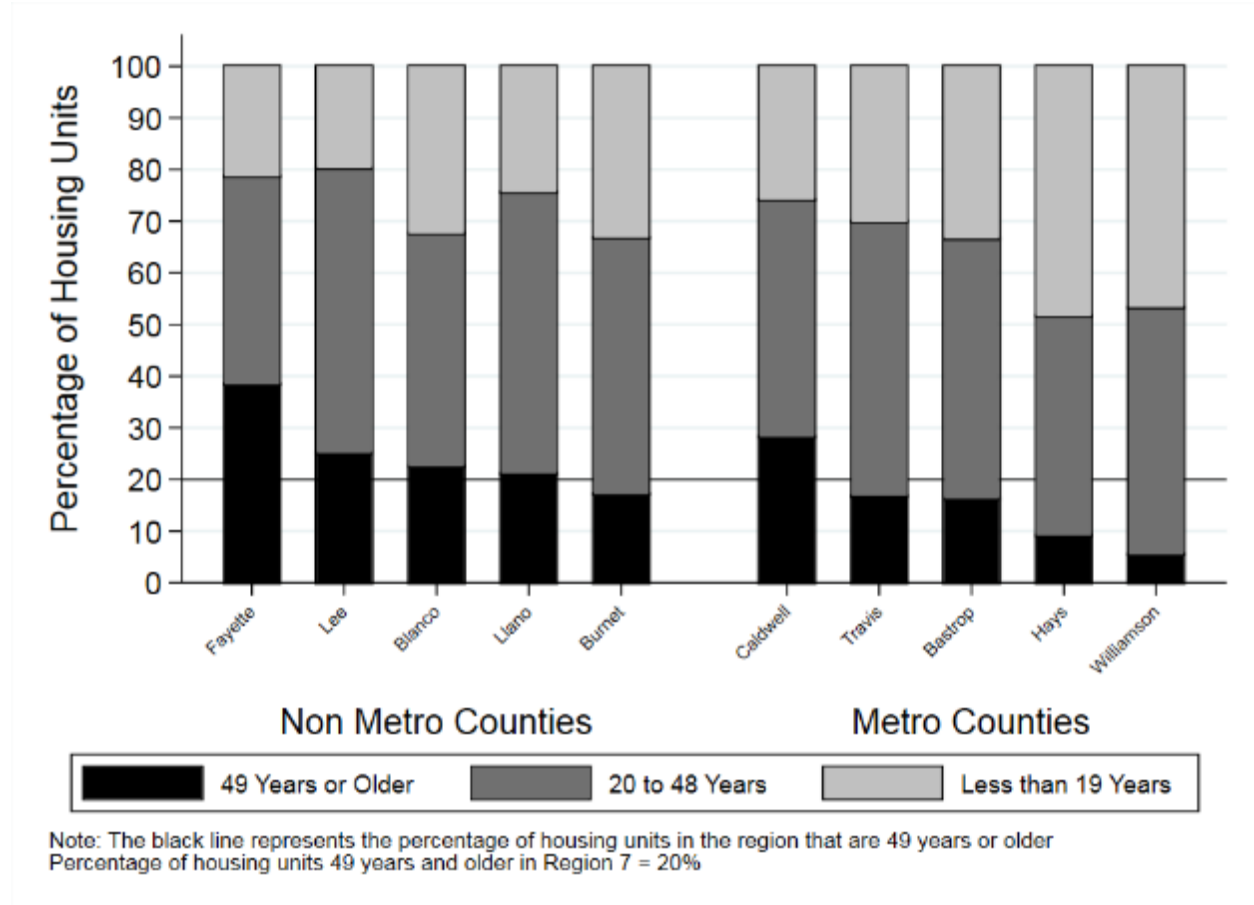
Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.



### Housing Profile

Figure 5-193 and Figure 5-194 show the age of the housing stock in Region 7.

**Figure 5-193: Age of Housing Stock in Region 7, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Population growth in Region 7 has largely been in Austin and the surrounding area. In Williamson and Hays counties, the counties neighboring Travis County (Austin, TX), nearly half of the housing stock is less than 19 years old and less than 10% is older than 48 years, which suggests a rapidly growing suburban area.

**Figure 5-194: Age of Housing Stock in Region 7, By County, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Bastrop	16.3%	50.3%	33.4%
Blanco	22.5%	45.1%	32.4%
Burnet	17.1%	49.7%	33.2%
Caldwell	28.2%	45.9%	25.9%
Fayette	38.4%	40.2%	21.4%
Hays	9.2%	42.4%	48.4%
Lee	25.1%	55.2%	19.7%
Llano	21.1%	54.4%	24.4%
Travis	16.8%	53.1%	30.1%
Williamson	5.4%	47.8%	46.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-195 shows households in Region 7 experiencing one or more housing problems.

**Figure 5-195: Percent of Households with One or More Housing Problems, Region 7, 2010 to 2014**

Households with One or More Housing Problems	Metro	Non-Metro	Region 7 Total	State Total
ELI Renter Households	84.6%	73.0%	84.2%	79.4%
VLI Renter Households	90.6%	66.7%	89.4%	82.7%
LI Renter Households	58.0%	36.3%	57.3%	52.1%
MI Renter Households	24.0%	16.1%	23.7%	24.2%
Renter Households with Incomes Greater than 100% AMFI	8.2%	3.9%	8.0%	8.5%
Percent Total Renter Households	50.5%	38.9%	50.0%	48.2%
ELI Owner Households	77.8%	71.4%	77.1%	73.6%
VLI Owner Households	66.4%	49.9%	64.2%	57.2%
LI Owner Households	55.7%	32.0%	53.3%	42.8%
MI Owner Households	37.5%	18.8%	36.1%	29.0%
Owner Households with Incomes Greater than 100% AMFI	10.3%	8.0%	10.2%	9.1%
Percent Total Owner Households	26.0%	23.1%	25.8%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

The Metro counties of Region 7 in particular have very high rates of housing problems for ELI, VLI, LI, and MI owner and ELI and VLI renter households, the highest rates among all regions. Rates of housing problems are so high in Metro counties that despite average rates in Non-Metro counties, Region 7 as a whole still has the highest percentage of households experiencing housing problems in the previously mentioned income categories among all regions. Figure 5-196 shows renter and owner households in Region 7 lacking complete plumbing or kitchen facilities.

**Figure 5-196: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 7, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 7 Total</b>	<b>State Total</b>
ELI Renter Households	2.0%	5.3%	2.1%	2.7%
VLI Renter Households	1.3%	2.4%	1.4%	2.3%
LI Renter Households	1.3%	3.8%	1.4%	1.8%
MI Renter Households	1.1%	2.6%	1.2%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.0%	2.8%	1.1%	1.2%
Percent Total Renter Households	1.3%	3.4%	1.4%	1.9%
ELI Owner Households	2.3%	2.4%	2.3%	2.6%
VLI Owner Households	1.0%	3.2%	1.3%	1.6%
LI Owner Households	0.7%	1.7%	0.8%	0.8%
MI Owner Households	0.3%	0.0%	0.3%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.4%	0.3%	0.4%	0.4%
Percent Total Owner Households	0.6%	1.0%	0.6%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Region 7 has low percentages of units lacking plumbing or kitchen facilities compared to other regions, particularly in Metro counties. Rates are higher in Non-Metro than Metro counties for all households with incomes less than or equal to 80% AMFI and for renter households with incomes greater than 80% AMFI. Owner households with incomes greater than 80% AMFI have higher rates of lacking plumbing or kitchen facilities in Metro counties. ELI owner households are more likely to lack complete facilities than ELI renter households. Figure 5-197 shows renter and owner households in Region 7 that are cost burdened. Region 7 has by far the highest rates of housing cost burden among all regions. Over 4 out of 5 ELI renter households in Region 7 experience housing cost burden. Both owner and renter households in Metro counties are particularly affected by housing cost burden. Metro counties have higher rates than Non-Metro counties in general, which would suggest that the Austin-Round Rock MSA has a particularly expensive housing market.

**Figure 5-197: Percent of Households Experiencing Cost Burden, Region 7, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 7 Total</b>	<b>State Total</b>
ELI Renter Households	83.3%	70.8%	82.9%	77.3%
VLI Renter Households	87.2%	65.4%	86.1%	78.1%
LI Renter Households	52.5%	30.1%	51.7%	44.5%
MI Renter Households	19.0%	11.4%	18.7%	17.0%
Renter Households with Incomes Greater than 100% AMFI	4.8%	0.6%	4.6%	4.0%
Percent Total Renter Households	46.9%	35.6%	46.5%	43.3%
ELI Owner Households	75.7%	68.8%	74.9%	70.9%
VLI Owner Households	63.6%	47.1%	61.4%	52.8%
LI Owner Households	51.8%	30.5%	49.6%	37.5%
MI Owner Households	34.1%	17.2%	32.8%	24.3%
Owner Households with Incomes Greater than 100% AMFI	9.0%	7.0%	8.8%	6.9%
Percent Total Owner Households	24.0%	21.7%	23.8%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Figure 5-198 shows renter and owner households in Region 7 that are overcrowded.

**Figure 5-198: Percent of Households Experiencing Overcrowding, Region 7, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 7 Total</b>	<b>State Total</b>
ELI Renter Households	9.5%	7.0%	9.4%	10.0%
VLI Renter Households	9.5%	9.8%	9.6%	10.7%
LI Renter Households	6.0%	2.8%	5.9%	7.9%
MI Renter Households	4.2%	1.6%	4.1%	6.2%
Renter Households with Incomes Greater than 100% AMFI	2.6%	0.4%	2.5%	3.6%
Percent Total Renter Households	6.1%	4.4%	6.1%	7.5%
ELI Owner Households	5.3%	1.6%	4.9%	5.5%
VLI Owner Households	5.5%	0.5%	4.8%	6.1%
LI Owner Households	4.6%	1.6%	4.3%	5.8%
MI Owner Households	3.2%	2.2%	3.1%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.1%	0.7%	1.0%	1.8%
Percent Total Owner Households Overcrowded	2.2%	1.0%	2.1%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Rates of overcrowding are higher in the Metro counties of Region 7 for all but VLI renter households, where the rates are extremely close but slightly higher in Non-Metro counties. The cost of housing in Region 7 is prohibitively high, which exacerbates the higher than average rate

of overcrowding among households with incomes less than or equal to 50% AMFI. Overcrowding rates are extremely low for owner households in Non-Metro counties of Region 7.

**Figure 5-199: Average Housing Costs, Region 7, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$1,320
Average Monthly Rent	\$999

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Figure 5-199 shows the average housing costs in Region 7. The average monthly rent for Region 7 is approximately \$1,000, nearly twice that of many other region in Texas, and the highest of all the regions. Additionally, Region 7 has the highest average monthly owner costs of any region. Figure 5-200 shows the number of bedrooms in renter and owner occupied households in Region 7.

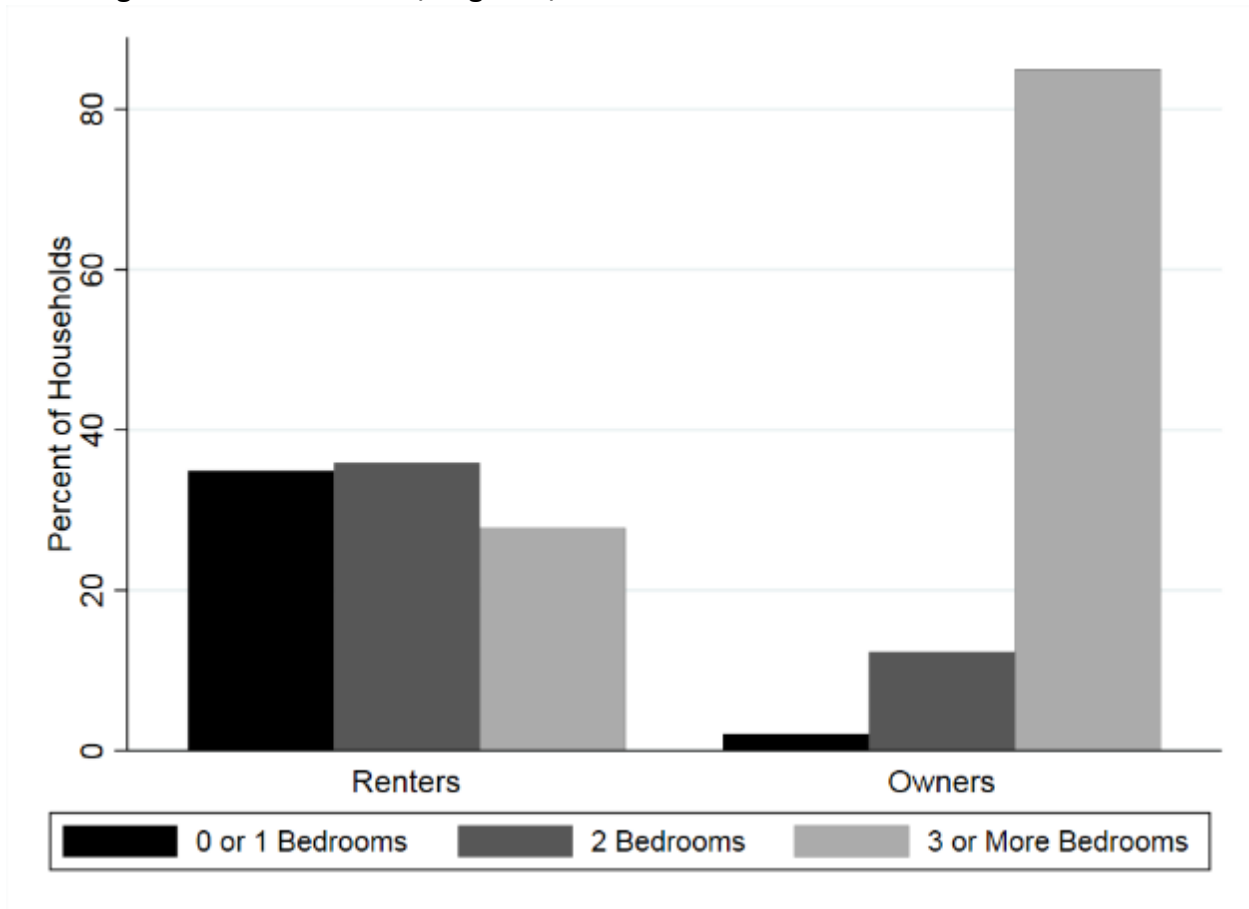
**Figure 5-200: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 7, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	290,434	35.4%	36.4%	28.2%
Owner Occupied	421,985	2.1%	12.4%	85.5%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-201 is a visual representation of the regional data from Figure 5-200.

**Figure 5-201: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 7, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Region 7 has the largest proportion of renter occupied units compared to owner occupied units among all regions with 40.8% of total occupied units being renter occupied. Of total occupied units in Region 7, 15.7% consist of 0 or 1 bedrooms, the highest percentage among all regions. 62.1% of total occupied units and 28.2% of renter occupied units consist of 3 or more bedrooms, the lowest among all regions. More than 7 in 10 rental units have only two or fewer bedrooms, which can exacerbate high rents in the area and contribute to the overcrowding that Metro renters experience. Figure 5-202 maps the active multifamily properties in Region 7 participating in TDHCA programs.

**Figure 5-202: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 7, 2018**

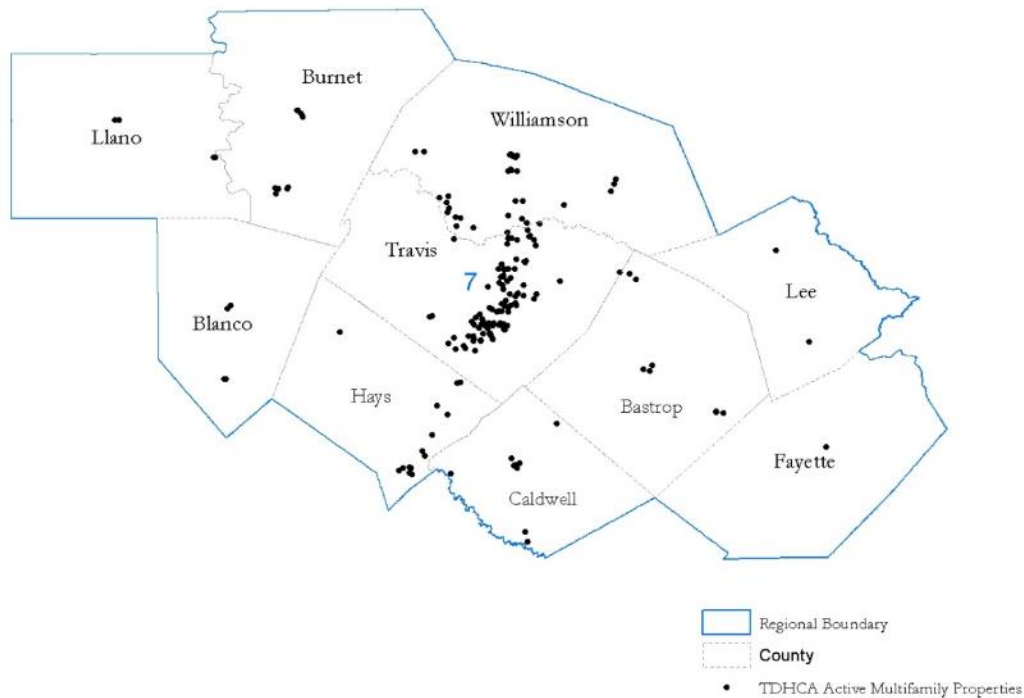


Figure 5-203 shows the number of multifamily properties participating in TDHCA programs by county in Region 7. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-203: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 7, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Bastrop	10	383	363
Blanco	6	142	114
Burnet	10	572	540
Caldwell	11	357	347
Fayette	1	40	40
Hays	20	2,850	2,601
Lee	3	136	135
Llano	6	338	323
Travis	118	19,313	18,442
Williamson	38	4,992	4,333
<b>Total</b>	<b>223</b>	<b>29,123</b>	<b>27,238</b>

Source: TDHCA, Central Database, data pull from June 2018.

Active multifamily properties participating in TDHCA programs are concentrated along the Interstate 35 corridor, particularly in Travis and Williamson counties. The City of Austin is primarily in Travis County but extends into Williamson and Hays counties, which also have a notable property count. Williamson County also contains Georgetown and Round Rock, and Hays County contains San Marcos, all along the Interstate 35 corridor and all with a presence of active multifamily properties participating in TDHCA programs.



## Region 8—“Central Texas”

**Point of Reference Cities:** Waco, College Station, Temple, Killeen

### Geo-Demographic Background

Settlers from around the world found their home in the Central Texas region as the land supports ranching cattle and farming. The Brazos River bisects the region and flows directly through Waco, which is the largest city in the region. Cattle drives, railroads, and farming communities along with settlers from Germany, Spain, and Italy made this region a diverse collection of new Texans. Similar to other Texas towns based around agriculture and ranching, religious institutions are centers of the community.

Today agriculture and ranching is still a large part of the economy and the region is supported by two major universities, Baylor University in Waco and Texas A&M University in College Station. Fort Hood Military Base, located in Killeen, is also a significant institution in the region. Lower income and minority households reside mostly within the region’s cities. Figure 5-204 shows the counties of TDHCA Region 8.

**Figure 5-204: State of Texas’ Region 8 Counties**

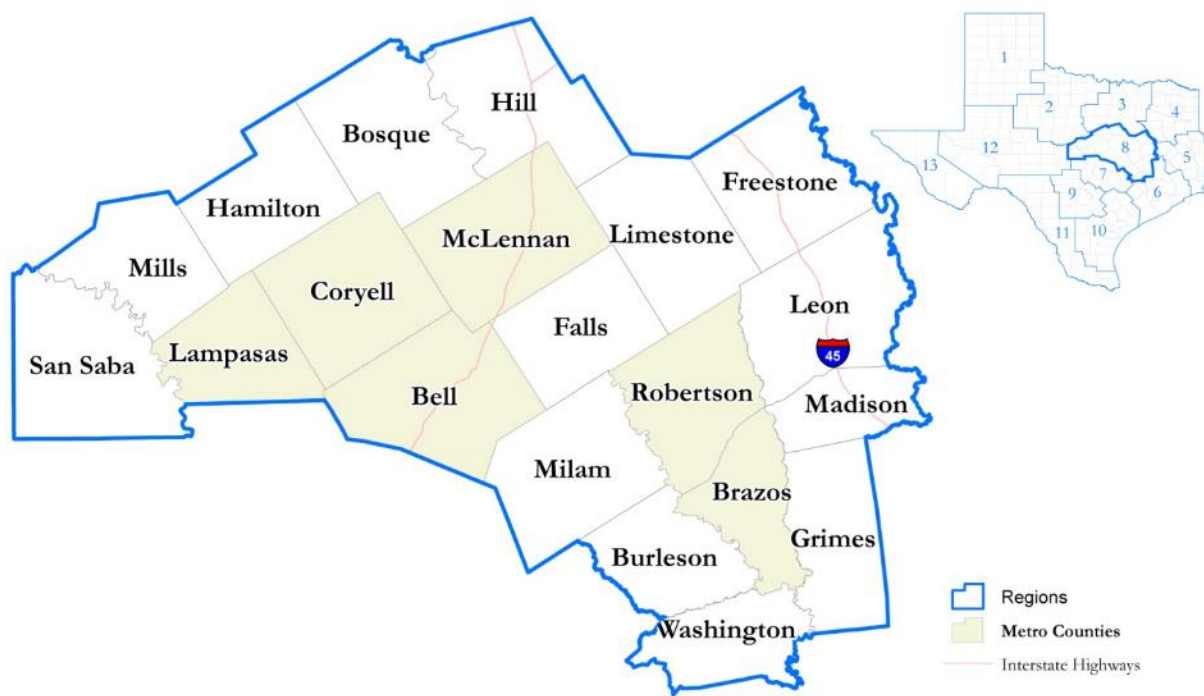


Figure 5-205 displays the population composition of Region 8 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

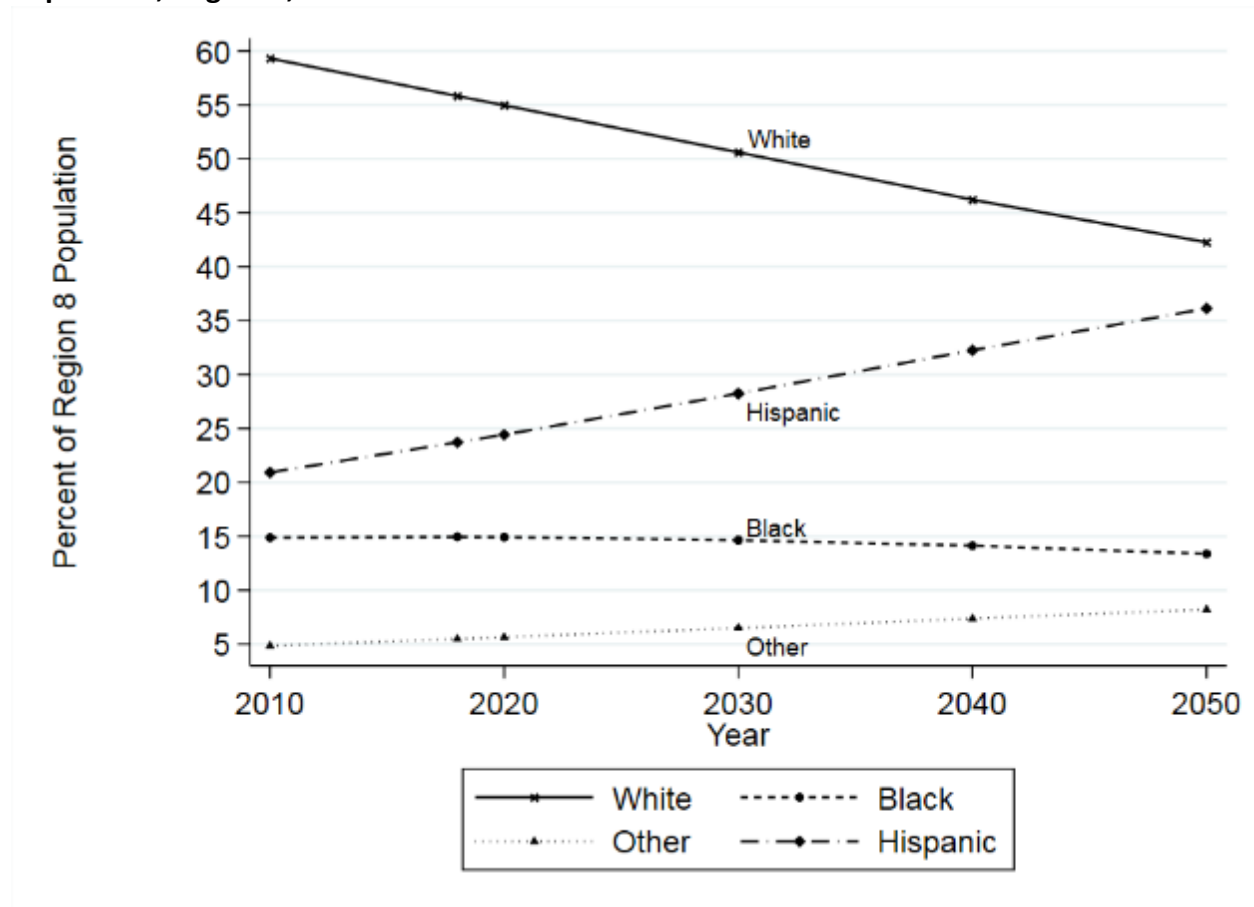
**Figure 5-205: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 8, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	59.3%	14.9%	4.9%	20.9%	1,118,361
2018	55.8%	15.0%	5.5%	23.7%	1,230,888
2020	55.0%	14.9%	5.7%	24.4%	1,260,125
2030	50.6%	14.6%	6.5%	28.2%	1,404,196
2040	46.2%	14.1%	7.4%	32.3%	1,544,552
2050	42.3%	13.4%	8.2%	36.1%	1,694,350

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 8 closely reflects the state as a whole. Race and ethnicity population projections show Region 8 slowly becoming majority-minority. Figure 5-206 is a visual representation of Figure 5-205.

**Figure 5-206: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 8, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

### Race and Ethnicity

Figure 5-207 shows the R/ECAPs in Region 8. Figure 5-208 shows the R/ECAPs in Waco and Temple. Figure 5-209 shows the R/ECAPs in Bryan and CLooege Station. A list of the census tracts designated as R/ECAPS is available in Appendix D as well.

**Figure 5-207: Map of R/ECAPS, Region 8, 2018**

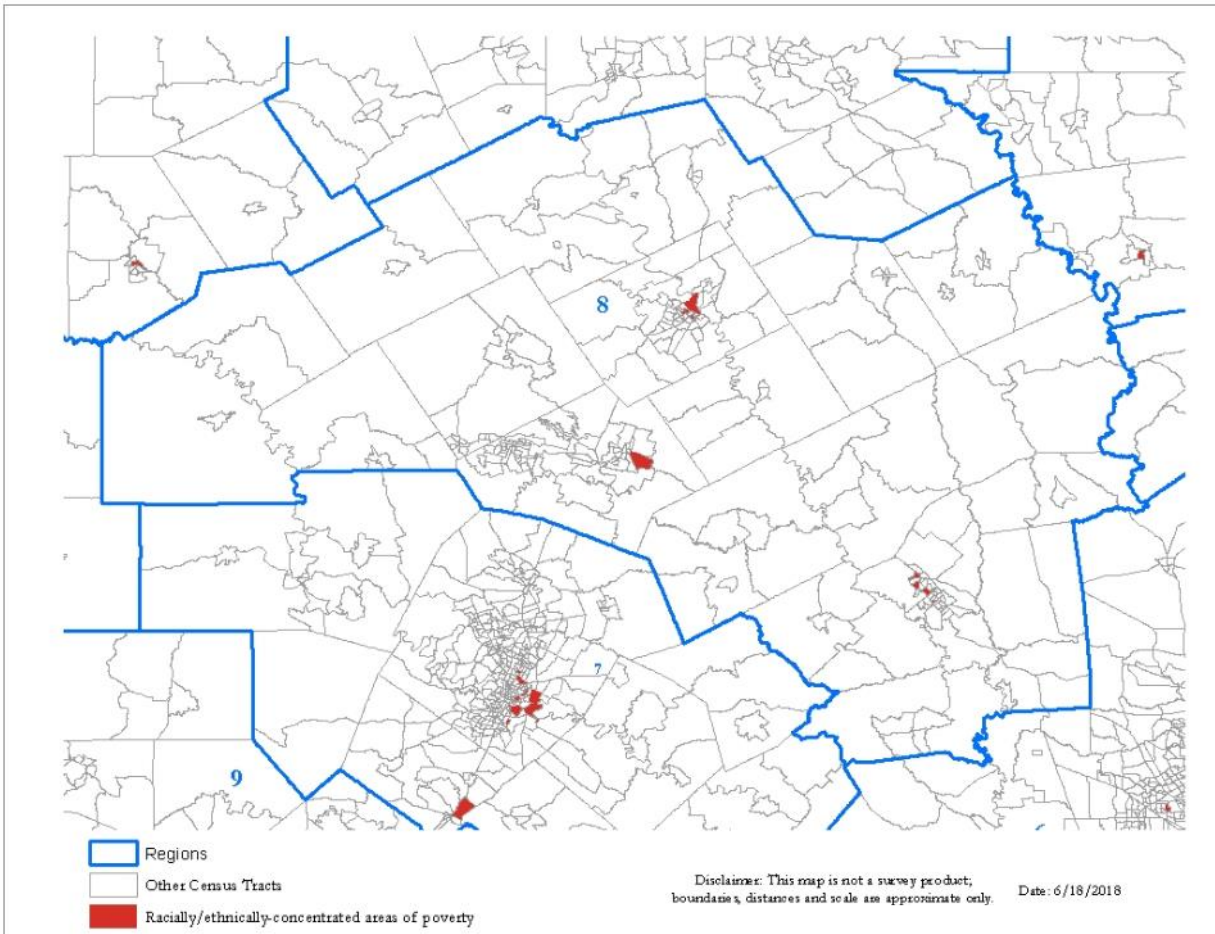


Figure 5-208: Map of R/ECAPS, Waco and Temple, Region 8, 2018

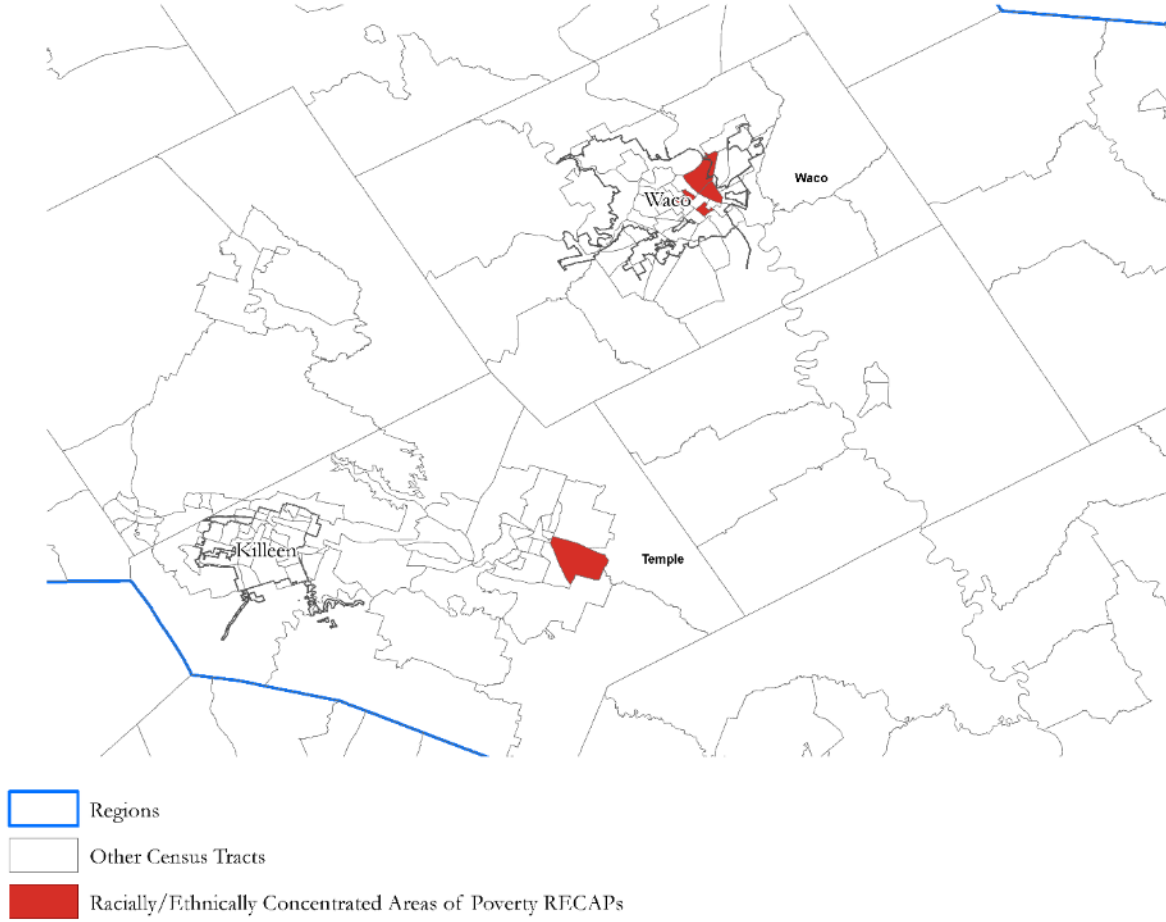


Figure 5-209: Map of R/ECAPS, Bryan and College Station, Region 8, 2018

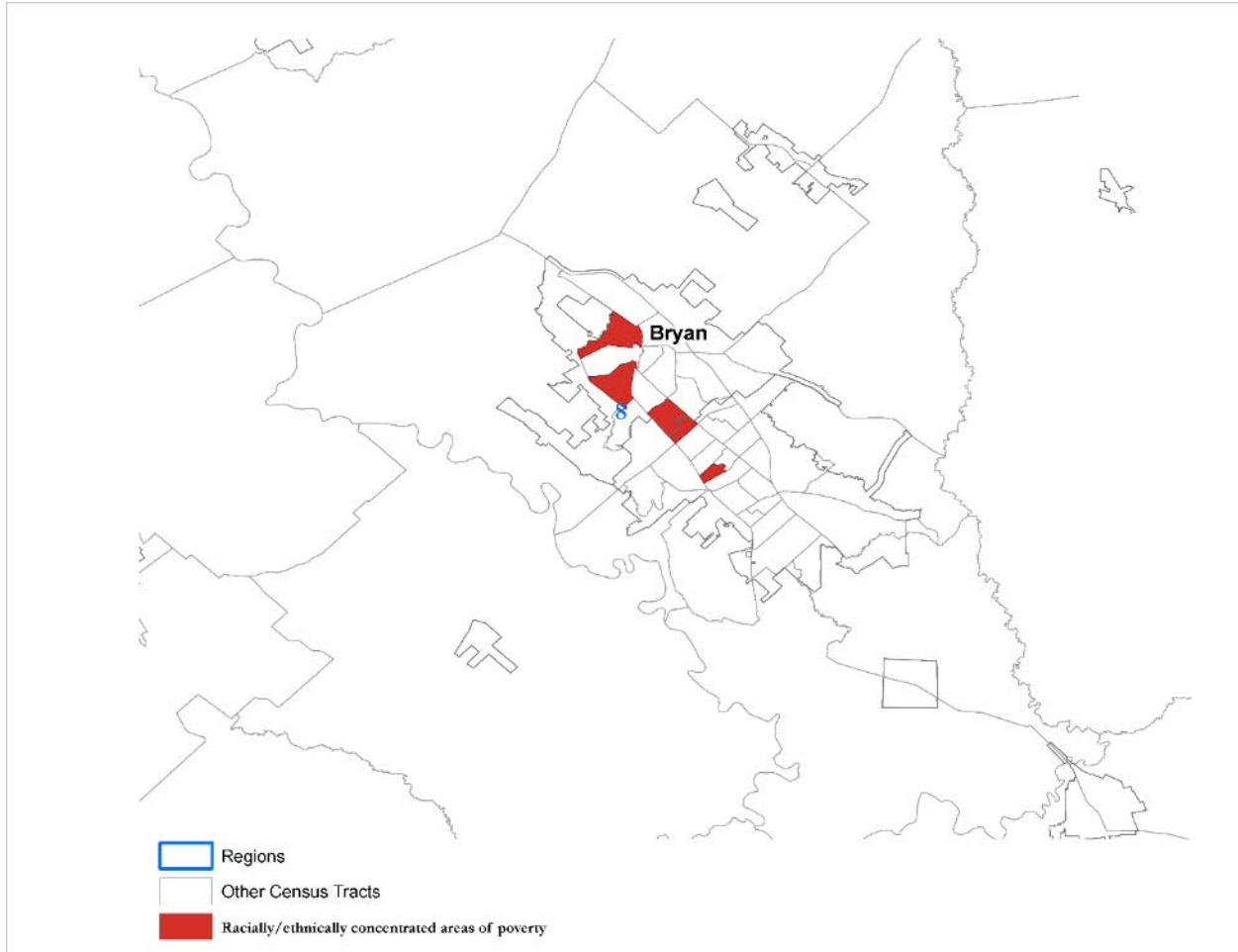
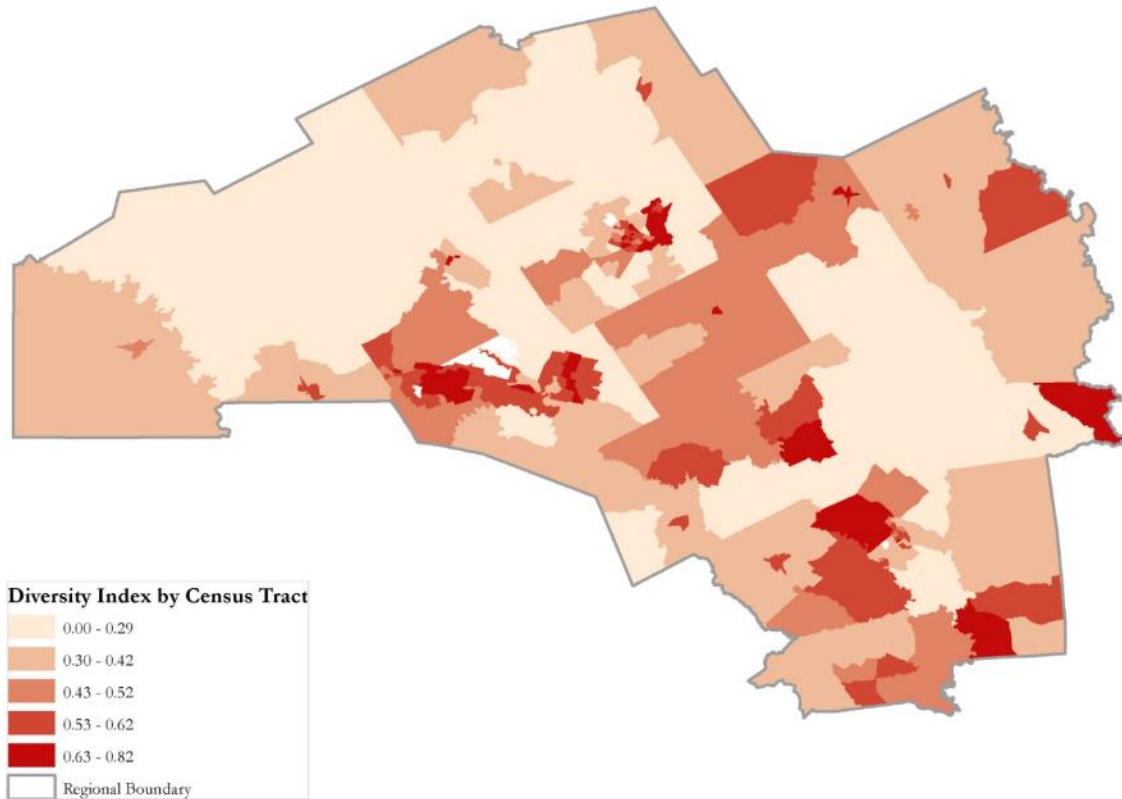


Figure 5-210 shows the Diversity Index by census tract for Region 8.

**Figure 5-210: Diversity Index, Region 8, 2018**



R/ECAPs in Region 8 are focused in the urban centers of Waco, Temple, and College Station. Similar to Region 7, based on the R/ECAPs in Waco and Temple and the Diversity Index values of census tracts in the Waco-Temple-Killeen area, much of the minority population in Region 8 resides along the Interstate 35 corridor. While Waco, Temple, and College Station all have census tracts with high Diversity Index values, there are some outlying tracts in the eastern half of Region 8 with equitable distribution of diversity as well. Detailed tables of the diversity index by census tract can be found in Appendix E

### Household Characteristics

Figure 5-211 shows the family characteristics of Region 8 households.

**Figure 5-211: Household and Family Characteristics, Region 8, 2012 to 2016**

	Texas	Region 8
Total Households	9,289,554	407,893
Average Household Size	2.84	2.69
Percent of Households with a Minor	37.6%	34.0%
Total Family Households	6,405,049	273,028
Average Family Household Size	3.44	3.26
Average Non-Family Household Size	1.28	1.37

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 8 has the second highest average non-family household size behind Region 7, indicating there may be affordability issues in that region. The percent of female-headed households with a minor is slightly larger in Region 8 than in the state as a whole, though not by as much as Region 1 or Region 11.

### Income

Figure 5-212 displays household income by race and ethnicity for Region 8. Region 8 is very similar to Region 7, with a majority of White and Asian households at or above the AMFI. Like many other regions more than 35% of Black or African American households are at or below 50% AMFI, however slightly fewer Hispanic households are at that same income category, with only 30% of Hispanic households at or below 50% AMFI.

**Figure 5-212: Household Income Category by Race and Ethnicity, Region 8, 2010 to 2014**

	Texas	Region 8	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	13.5%	10.9%	20.5%	25.3%	15.3%	13.1%	17.5%	15.7%
VLI	12.2%	11.6%	9.7%	16.4%	9.4%	6.6%	10.2%	14.0%	15.4%
LI	16.8%	17.1%	15.8%	17.9%	15.8%	19.5%	26.4%	8.7%	22.5%
MI	9.5%	9.6%	9.2%	9.2%	10.8%	5.0%	8.2%	10.3%	11.5%
Greater than 100 Percent AMFI	48.5%	48.1%	54.4%	35.9%	38.7%	53.6%	42.2%	49.5%	34.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

### Disability

Of the civilian non-institutionalized population of Region 8, 13.7% has a disability, which is slightly higher than state’s rate of 11.6%. The disparity between Metro and Non-Metro counties is also present, but less pronounced than in more urbanized regions of the state. The biggest difference in Region 8 is a high rate of ambulatory disabilities, which may be due to a large concentration of

military and veteran residents and proximity to the Fort Hood Military Base in Killeen, TX. Figure 5-213 shows prevalence of disability by disability type in Region 8, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 5-213: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 8, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	1,098,913	880,860	218,053
Population With a Disability	3,083,141	150,167	112,839	37,328
Percent of Population with a Disability	11.6%	13.7%	12.8%	17.1%
Percent of Population with a Hearing Difficulty	3.4%	4.0%	3.7%	5.3%
Percent of Population with a Vision Difficulty	2.5%	2.6%	2.4%	3.2%
Percent of Population with a Cognitive Difficulty	4.3%	5.0%	5.0%	5.4%
Percent of Population with an Ambulatory Difficulty	6.1%	7.3%	6.7%	10.0%
Percent of Population with a Self-Care Difficulty	2.4%	2.6%	2.4%	3.2%
Percent of Population with an Independent Living Difficulty	3.9%	4.3%	4.1%	5.4%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-214 shows the percent of the civilian non-institutionalized population with a disability in Region 8 by gender and age. Unlike much of the rest of the state, Region 8 has higher rates of disability among children in Metro counties than in Non-Metro counties

**Figure 5-214: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 8, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Percent of Population with a Disability	11.6%	13.7%	12.8%	17.1%
Percent of Males with a Disability	11.5%	13.8%	13.0%	17.0%
Percent of Female with a Disability	11.8%	13.5%	12.7%	17.2%
Percent of Minors With a Disability	4.2%	5.0%	5.0%	4.8%
Percent of Children Under Age 5 with a Disability	0.8%	1.2%	1.2%	0.8%
Percent of Children Aged 5-17 with a Disability	5.5%	6.6%	6.7%	6.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-215 shows the percent of the civilian non-institutionalized population with a disability in Region 8 by race/ethnicity. Region 8 rates of disability across races and ethnicity align closely with the state rates.



**Figure 5-215: Percent of Civilian Non-Institutionalized Population with Disability by Race/Ethnicity, Region 8, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Population	11.6%	13.7%	12.8%	17.1%
White	11.9%	13.9%	12.9%	17.2%
Black or African American	13.4%	15.7%	15.2%	19.0%
American Indian or Alaskan Native	15.8%	13.6%	13.1%	15.6%
Asian	5.7%	6.0%	5.9%	6.6%
Hawaiian or Other Pacific Islander	8.5%	8.2%	8.3%	0.0%
Some Other Race	9.2%	8.7%	8.6%	9.3%
Two or More Races	11.1%	12.4%	11.9%	16.8%
Hispanic or Latino	9.5%	8.7%	8.8%	8.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

### Poverty

Region 8 has slightly higher rates of poverty than the state but overall aligns closely with state levels. Figure 5-216 shows the prevalence of poverty in Region 8 by poverty level.

**Figure 5-216: Poverty Rates by Poverty Level, Region 8, 2012 to 2016**

	<b>Texas</b>	<b>Region 8</b>
Total Population for Whom Poverty Status is Determined	26,334,005	1,096,556
Below 100% Poverty (Overall Poverty Rate)	16.7%	18.6%
Below 50% of Poverty	7.0%	8.8%
Below 150% of Poverty	27.3%	29.7%
Below 200% of Poverty	37.2%	40.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-217 shows the percentage of individuals below the poverty line (100% poverty) in Region 8 by age, gender and race/ethnicity. In Region 8, more than one in four Black and African American and Asians live below the poverty line. Compared to other regions, Region 8 has the highest poverty rate among Asians, more than double that of the state.

**Figure 5-217: Poverty Rates by Age, Gender and Race/Ethnicity, Region 8, 2012 to 2016**

	Texas	Region 8
Total Population for Whom Poverty Status is Determined	26,334,005	1,096,556
Below 100% Poverty (Overall Poverty Rate)	16.7%	18.6%
Metro County	16.4%	18.9%
Non-Metro County	18.7%	17.2%
Under 18	23.9%	23.9%
Male	15.2%	17.2%
Female	18.2%	19.9%
White	15.5%	16.2%
Black or African American	22.6%	26.6%
American Indian and Alaskan Native	21.2%	18.6%
Asian	11.1%	26.7%
Hawaiian and Other Pacific Islander	14.0%	12.4%
Some Other Race	24.4%	24.2%
Two or More Races	17.2%	22.5%
Hispanic or Latino	24.2%	24.2%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-218 shows the share of job counts by distance between the Work Census Block and the Home Census Block in the CBSA of College-Station-Bryan, TX. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. Over half of job holders in the College Station-Bryan CBSA drive less than 10 miles to work, but one in three still drive over 50 miles to work, this is likely due to people from surrounding communities commuting into the CBSA for work.

**Figure 5-218: Share of Job Counts by Distance between Work Census Block and Home Census Block, College Station-Bryan CBSA, TX 2015**

	Count	Share
Total All Jobs	111,198	100.0%
Less than 10 miles	57,103	51.4%
10 to 24 miles	10,096	9.1%
25 to 50 miles	6,839	6.2%
Greater than 50 miles	37,160	33.4%

Source: Job center information, On the Map data tool 2015, Census.gov

Figure 5-219 shows the share of job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Killeen-Temple, TX.

**Figure 5-219: Share of Job Counts by Distance between Work Census Block and Home Census Block, Killeen-Temple CBSA, TX, 2015**

	Count	Share
Total All Jobs	122,475	100.0%
Less than 10 miles	58,500	47.8%
10 to 24 miles	23,786	19.4%
25 to 50 miles	15,260	12.5%
Greater than 50 miles	24,929	20.4%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-220 shows the share of job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Waco, TX. Across the three CBSAs most job holders are traveling fewer than 10 miles between home and work. However, in all three CBSAs, a significant portion travels more than 50 miles for work. This indicates both near and far proximity to jobs within CBSAs.

**Figure 5-220: Share of Job Counts by Distance between Work Census Block and Home Census Block, Waco CBSA, TX, 2015**

	Count	Share
Total All Jobs	108,033	100.0%
Less than 10 miles	54,237	50.2%
10 to 24 miles	17,911	16.6%
25 to 50 miles	8,155	7.5%
Greater than 50 miles	27,730	25.7%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-221 shows the employment and living situation for individuals in each county of Region 8.

**Figure 5-221: Employment and Living Situations, Counties in Region 8, 2015**

County	Employed in County & Living Outside	Lived and Worked in County	Live in County and employed outside	Percent that Live in County and employed outside
Bell	37,177	62,003	48,937	44.1%
Bosque	1,730	2,032	5,254	72.1%
Brazos	45,005	58,616	27,154	31.7%
Burleson	2,423	1,534	6,695	81.4%
Coryell	12,867	6,522	13,789	67.9%
Falls	1,564	1,074	5,304	83.2%
Freestone	3,378	2,233	5,490	71.1%
Grimes	3,700	2,022	9,797	82.9%
Hamilton	1,003	1,292	2,031	61.1%
Hill	5,442	3,629	9,634	72.6%
Lampasas	2,083	1,823	6,120	77.0%
Leon	3,370	1,787	3,215	64.3%
Limestone	3,204	3,109	6,219	66.7%
McLennan	37,707	67,688	36,157	34.8%
Madison	3,231	1,885	3,856	67.2%
Milam	3,005	3,029	7,026	69.9%
Mills	570	821	1,037	55.8%
Robertson	1,972	1,648	5,572	77.2%
San Saba	559	781	1,487	65.6%
Washington	8,229	7,552	9,321	55.2%
Total	178,219	231,080	214,095	48.1%

Source: On the map data, 2015, with out of state employment data excluded.

Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it. While a majority of job holders are traveling less than 10 miles to work, an abnormally high level of job holders are travelling more than 50 miles to work in Region 8 likely indicating that jobs are not evenly distributed across the region. Some job holders may be travelling to other regions, such as nearby Region 7 and Region 3, for jobs.

Figure 5-222 shows the mean travel time to work for counties in Region 8. Mean travel times in Region 8 vary widely from 17.3 minutes to 31.6 minutes. Considering the high number of individuals driving more than 50 miles to work as well as somewhat higher commute times, it can be assumed that many individuals are driving to the job centers in CBSAs for work, indicating job distribution across the region is inconsistent with where individuals are finding housing.

**Figure 5-222: Mean Travel Time to Work, Counties in Region 8, 2012 to 2016**

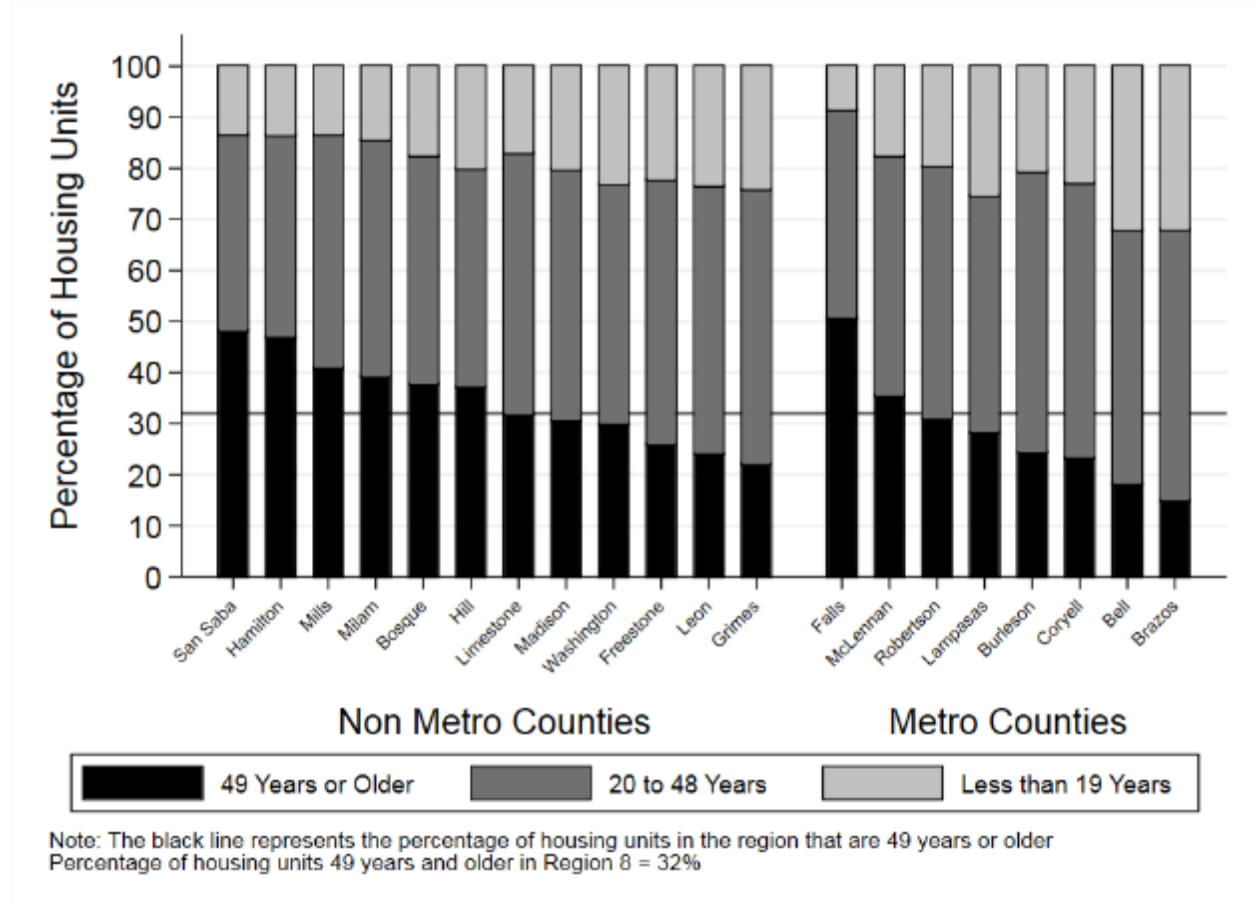
<b>County</b>	<b>Mean travel time to work (minutes)</b>
Bell	20.2
Bosque	29.5
Brazos	17.3
Burleson	26.7
Coryell	21.6
Falls	26
Freestone	25.8
Grimes	31.6
Hamilton	20
Hill	27.6
Lampasas	27.3
Leon	27.8
Limestone	20.6
Madison	23.6
McLennan	19.1
Milam	27.9
Mills	17.1
Robertson	24.4
San Saba	20.8
Washington	21.1

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

### Housing Profile

Figure 5-223 and Figure 5-224 show the age of the housing stock in Region 8.

**Figure 5-223: Age of Housing Stock in Region 8, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Nestled between the Capital Region and the Metroplex, Region 8 follows a similar pattern to other less urbanized regions, with approximately one in three housing units being 49 years or older. However, unlike Regions 1 and 2, more of the housing stock is newer.

**Figure 5-224: Age of Housing Stock in Region 8, By County, 2012 to 2016**

<b>County</b>	<b>49 Years or Older</b>	<b>20 to 48 Years Old</b>	<b>Less than 19 Years Old</b>
Bell	18.1%	49.8%	32.1%
Bosque	37.8%	44.7%	17.5%
Brazos	14.9%	53.1%	32.0%
Burleson	24.4%	54.9%	20.7%
Coryell	23.3%	53.8%	22.9%
Falls	50.7%	40.8%	8.5%
Freestone	25.9%	51.9%	22.2%
Grimes	22.1%	53.8%	24.1%
Hamilton	46.9%	39.6%	13.5%
Hill	37.2%	42.7%	20.1%
Lampasas	28.3%	46.4%	25.4%
Leon	24.1%	52.4%	23.4%
Limestone	31.8%	51.2%	17.0%
Madison	30.6%	49.2%	20.2%
McLennan	35.5%	47.0%	17.5%
Milam	39.2%	46.4%	14.4%
Mills	40.9%	45.7%	13.4%
Robertson	31.0%	49.4%	19.6%
San Saba	48.2%	38.5%	13.4%
Washington	29.9%	46.9%	23.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-225 shows households in Region 8 experiencing one or more housing problems.

**Figure 5-225: Percent of Households with One or More Housing Problems, Region 8, 2010 to 2014**

Households with One or More Housing Problems	Metro	Non-Metro	Region 8 Total	State Total
ELI Renter Households	79.0%	72.0%	78.2%	79.4%
VLI Renter Households	83.9%	62.8%	80.5%	82.7%
LI Renter Households	59.5%	36.3%	56.3%	52.1%
MI Renter Households	27.3%	16.9%	26.0%	24.2%
Renter Households with Incomes Greater than 100% AMFI	8.0%	7.1%	7.9%	8.5%
Percent Total Renter Households	49.6%	39.4%	48.2%	48.2%
ELI Owner Households	70.7%	73.5%	71.6%	73.6%
VLI Owner Households	61.0%	48.2%	56.8%	57.2%
LI Owner Households	40.7%	26.9%	36.4%	42.8%
MI Owner Households	26.2%	19.6%	24.6%	29.0%
Owner Households with Incomes Greater than 100% AMFI	8.0%	8.3%	8.1%	9.1%
Percent Total Owner Households	22.3%	22.2%	22.3%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

In general, rates of households experiencing one or more housing problems in Region 8 are relatively average, however LI renter households in Metro counties in particular have higher rates of housing problems compared to other regions. Rates of owner households with incomes above 100% AMFI experiencing one of more housing problems are higher in Non-Metro counties than in Metro counties, which differs from the pattern seen in other regions. Figure 5-226 shows renter and owner households in Region 8 lacking complete plumbing or kitchen facilities.

**Figure 5-226: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 8, 2010 to 2014**

Households Lacking Complete Plumbing or Kitchen Facilities	Metro	Non-Metro	Region 8 Total	State Total
ELI Renter Households	2.2%	8.1%	2.9%	2.7%
VLI Renter Households	1.4%	1.3%	1.4%	2.3%
LI Renter Households	1.7%	1.7%	1.7%	1.8%
MI Renter Households	1.5%	2.4%	1.6%	1.4%
Renter Households with Incomes Greater than 100% AMFI	0.9%	1.9%	1.0%	1.2%
Percent Total Renter Households	1.5%	3.1%	1.7%	1.9%
ELI Owner Households	1.9%	4.2%	2.6%	2.6%
VLI Owner Households	1.5%	1.4%	1.5%	1.6%
LI Owner Households	0.5%	1.1%	0.7%	0.8%
MI Owner Households	0.6%	1.8%	0.9%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.4%	0.8%	0.4%	0.4%
Percent Total Owner Households	0.6%	1.3%	0.8%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.



## Regional Analysis

Rates of units lacking complete plumbing or kitchen facilities in Region 8 are similar to statewide rates. Renter households in Non-Metro counties of Region 8 in particular have a higher percentage of units lacking complete plumbing or kitchen facilities than other regions. Figure 5-227 shows renter and owner households in Region 8 that are cost burdened.

**Figure 5-227: Percent of Households Experiencing Cost Burden, Region 8, 2010 to 2014**

Households Cost Burdened	Metro	Non-Metro	Region 8 Total	State Total
ELI Renter Households	77.7%	65.0%	76.2%	77.3%
VLI Renter Households	81.9%	59.1%	78.2%	78.1%
LI Renter Households	55.2%	29.7%	51.7%	44.5%
MI Renter Households	23.1%	8.2%	21.2%	17.0%
Renter Households with Incomes Greater than 100% AMFI	5.1%	1.1%	4.6%	4.0%
Percent Total Renter Households	46.7%	33.3%	44.9%	43.3%
ELI Owner Households	67.8%	71.0%	68.8%	70.9%
VLI Owner Households	58.1%	44.9%	53.7%	52.8%
LI Owner Households	38.7%	23.5%	33.9%	37.5%
MI Owner Households	22.8%	15.3%	20.9%	24.3%
Owner Households with Incomes Greater than 100% AMFI	6.3%	5.1%	6.0%	6.9%
Percent Total Owner Households	20.1%	18.9%	19.8%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Region 8 has higher rates of cost burden among renter households with incomes greater than 50% AMFI in Metro counties compared to other regions. Overall the rates of cost burden in Region 8 are relatively close to statewide figures. Figure 5-228 shows renter and owner households in Region 8 that are overcrowded.

**Figure 5-228: Percent of Households Experiencing Overcrowding, Region 8, 2010 to 2014**

Renter Households Overcrowded (>1 Person per Room)	Metro	Non-Metro	Region 8 Total	State Total
ELI Renter Households	3.4%	4.6%	3.5%	10.0%
VLI Renter Households	7.1%	5.1%	6.7%	10.7%
LI Renter Households	5.3%	7.6%	5.6%	7.9%
MI Renter Households	3.4%	6.6%	3.8%	6.2%
Renter Households with Incomes Greater than 100% AMFI	2.5%	4.2%	2.7%	3.6%
Percent Total Renter Households	4.1%	5.4%	4.3%	7.5%
ELI Owner Households	4.3%	4.2%	4.3%	5.5%
VLI Owner Households	4.2%	3.6%	4.0%	6.1%
LI Owner Households	2.5%	2.6%	2.5%	5.8%
MI Owner Households	2.9%	2.9%	2.9%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.4%	2.5%	1.6%	1.8%
Percent Total Owner Households Overcrowded	2.1%	2.8%	2.3%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Region 8 has relatively low levels of overcrowding for renter households, though generally higher rates in Non-Metro counties than in Metro counties. Compared to other regions and the state as a whole, Region 8 has low levels of overcrowding for both renter and owner households. ELI renter households in Region 8 have the lowest rate of overcrowding among all regions.

**Figure 5-229: Average Housing Costs, Region 8, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$736
Average Monthly Rent	\$716

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Figure 5-229 shows the average housing costs in Region 8. Situated along the Interstate 35 corridor between Austin and the Dallas-Fort Worth area, housing costs are lower than in the larger cities but higher than more outlying areas. Figure 5-230 shows the number of bedrooms in renter and owner occupied households in Region 8.

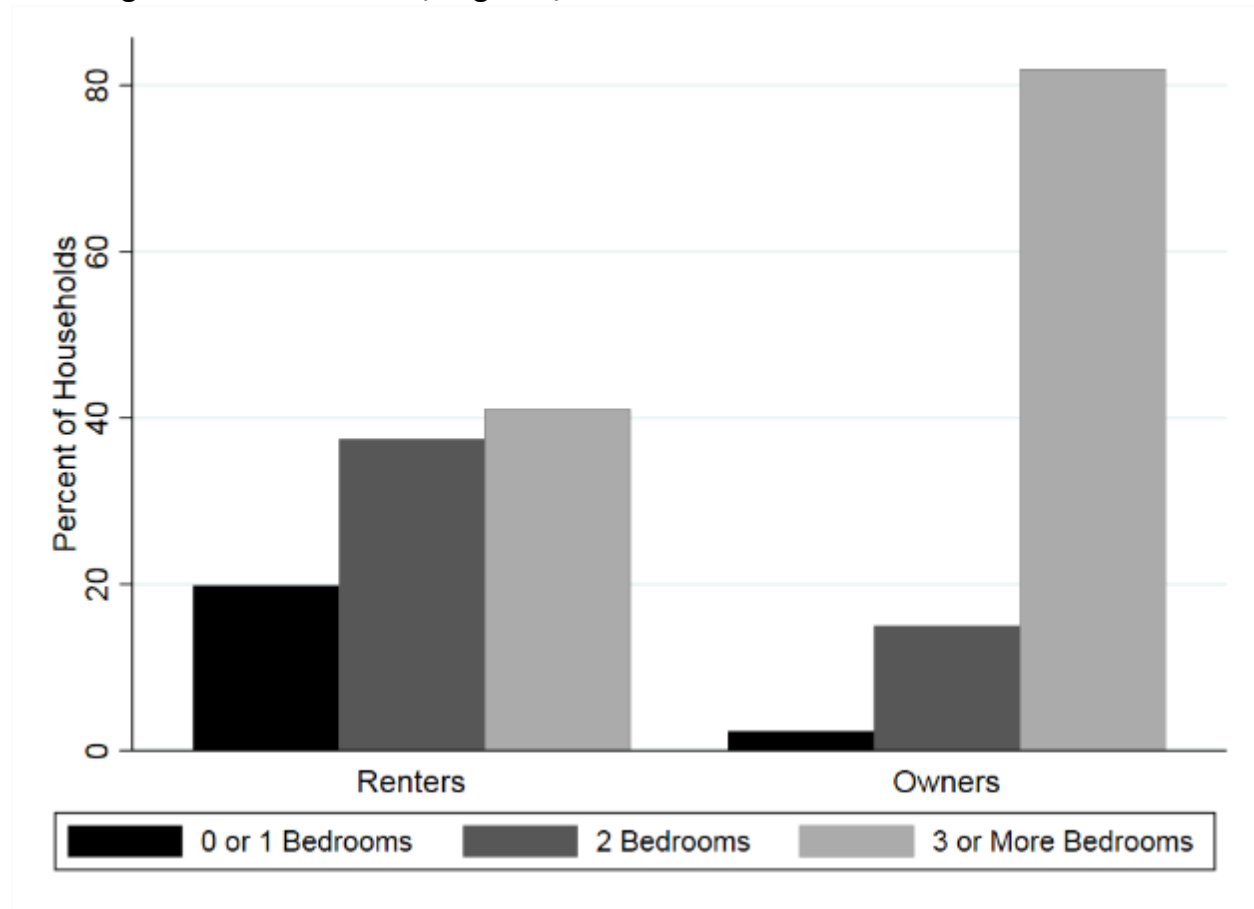
**Figure 5-230: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 8, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	155,582	20.2%	38.1%	41.8%
Owner Occupied	233,679	2.4%	15.1%	82.6%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-231 is a visual representation of the regional data from Figure 5-230.

**Figure 5-231: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 8, 2010 to 2014**



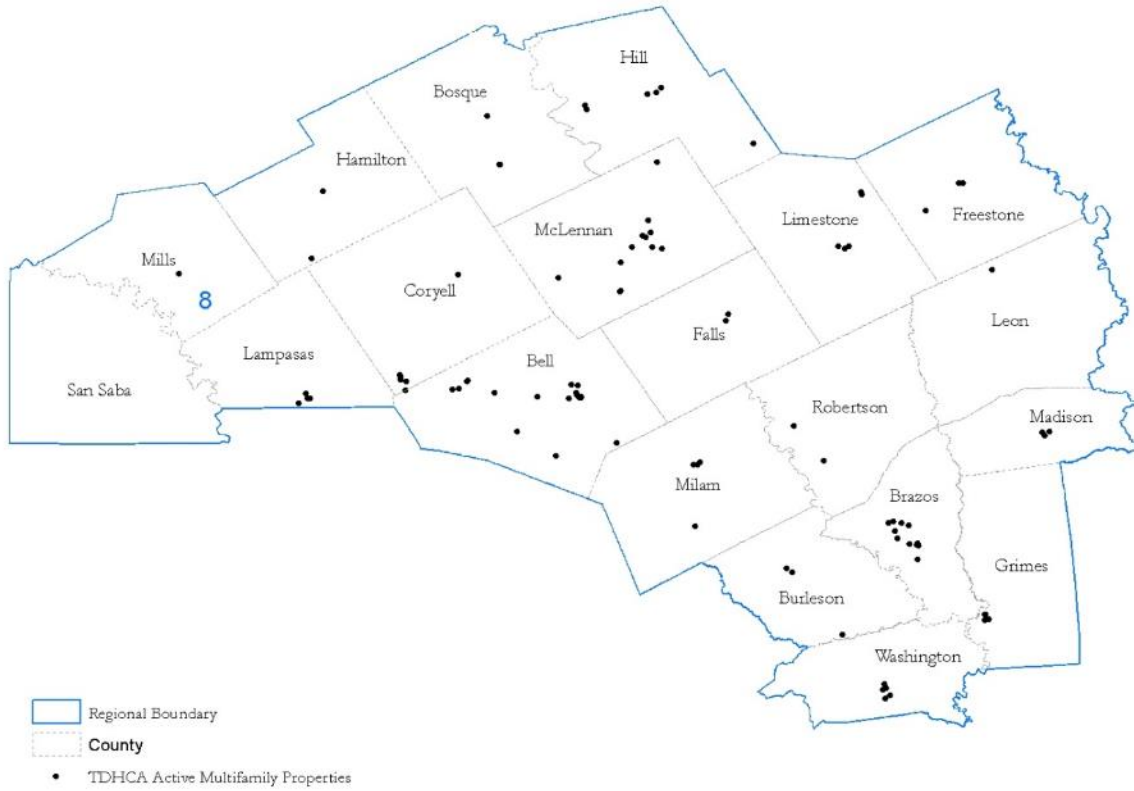
Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

40% of Region 8 occupied units are renter occupied, the second highest proportion behind Region 7. Region 8 is the only region where owner occupied units with 3 or more bedrooms do not make up the majority of the regional housing stock—only 49.6% of all units fall in this category.

Cost burden is the primary housing problem in Region 8, as is the case in the rest of the state. Region 8 has the second lowest percentage of renter occupied units with 0 or 1 bedrooms and the highest percentage of renter occupied units with 3 or more bedrooms among all regions. 31% of the occupied units in Region 8 are renter occupied units with 2 or more bedrooms, the highest percentage among all regions. The lack of smaller units available to both renters and owners likely affects the housing cost burden. Figure 5-232 maps the active multifamily properties in Region 8 participating in TDHCA programs.

Regional Analysis

Figure 5-232: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 8, 2018



## Regional Analysis

Figure 5-233 shows the number of multifamily properties participating in TDHCA programs by county in Region 8. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-233: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 8, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Bell	23	2,197	1,814
Bosque	3	86	86
Brazos	12	1,266	1,169
Burleson	3	80	80
Coryell	7	452	448
Falls	2	57	57
Freestone	3	93	89
Grimes	4	188	188
Hamilton	1	18	18
Hill	7	250	250
Lampasas	4	232	226
Leon	1	24	24
Limestone	5	280	280
Madison	3	84	84
McLennan	18	1,561	1,397
Milam	4	236	235
Mills	1	24	24
Robertson	2	40	40
Washington	6	418	412
<b>Total</b>	<b>109</b>	<b>7,586</b>	<b>6,921</b>

Source: TDHCA, Central Database, data pull from June 2018.

Active multifamily properties participating in TDHCA programs are clustered around larger municipalities and population centers. Bell County contains Temple, McLennan County contains Waco, and Brazos County contains the Bryan-College Station MSA.

## Region 9—“Alamo”

**Point of Reference Cities:** San Antonio, New Braunfels

### Geo-Demographic Background

Having the largest Spanish mission settlement in Texas, the San Antonio area has deep Texas roots and was the location of many important battles against Mexico for Texas’ independence, such as the Battle of the Alamo. The economy is supported by a large concentration of military bases and associated industries, tourism, and corporate headquarters. San Antonio has a proud and unique Texan and Hispanic cultural influence evident in its architecture, food, and cultural events.

The region has experienced strong suburban growth in the affluent suburbs north of San Antonio. The north side of the city and northern suburbs of San Antonio are majority White, while the remainder of the city is majority Hispanic or Latino. Counties surrounding San Antonio are less populated and participate in ranching, farming, and rural activities. Figure 5-234 shows the counties of TDHCA Region 9.

**Figure 5-234: State of Texas’ Region 9 Counties**

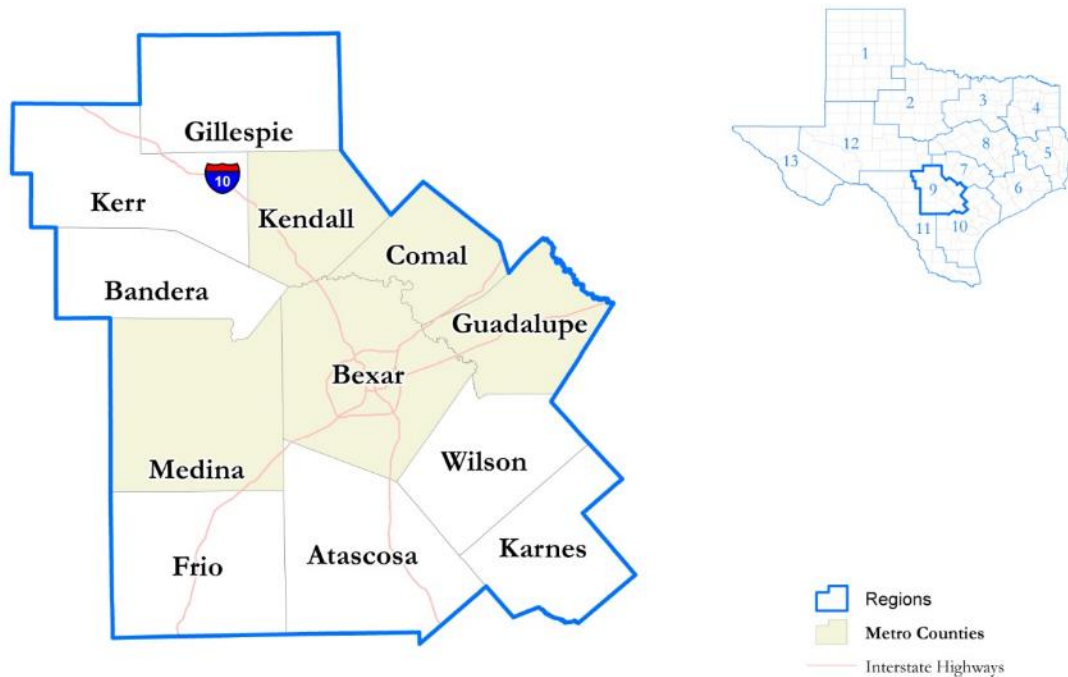


Figure 5-235 displays the population composition of Region 9 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

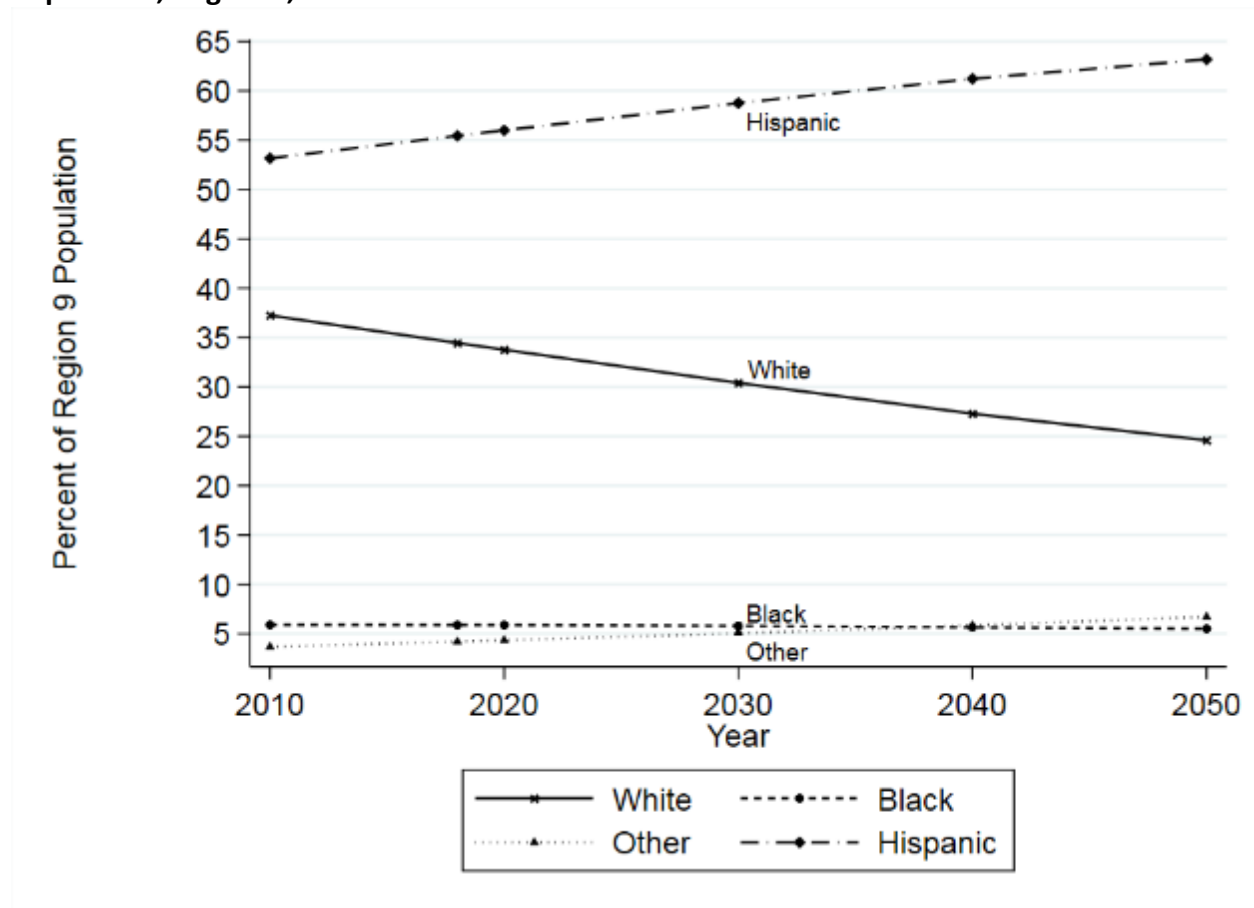
**Figure 5-235: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 9, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	37.3%	5.9%	3.7%	53.2%	2,249,011
2018	34.5%	5.9%	4.2%	55.4%	2,516,654
2020	33.8%	5.9%	4.3%	56.0%	2,585,407
2030	30.4%	5.8%	5.0%	58.8%	2,923,746
2040	27.3%	5.7%	5.8%	61.2%	3,229,351
2050	24.6%	5.5%	6.7%	63.2%	3,518,315

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Unlike other largely Metro regions, Region 9 is currently a majority Hispanic region. This trend is predicted to continue. By 2050, it is projected that one in four residents will be White, Non-Hispanic, and approximately two in three will be Hispanic or Latino. Figure 5-236 is a visual representation of Figure 5-235.

**Figure 5-236: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 9, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 5-237 shows the R/ECAPS in Region 9. Figure 5-238 shows the R/ECAPS in San Antonio. A list of the census tracts designated as R/ECAPS is available in Appendix D as well.

**Figure 5-237: Map of R/ECAPS, Region 9, 2018**

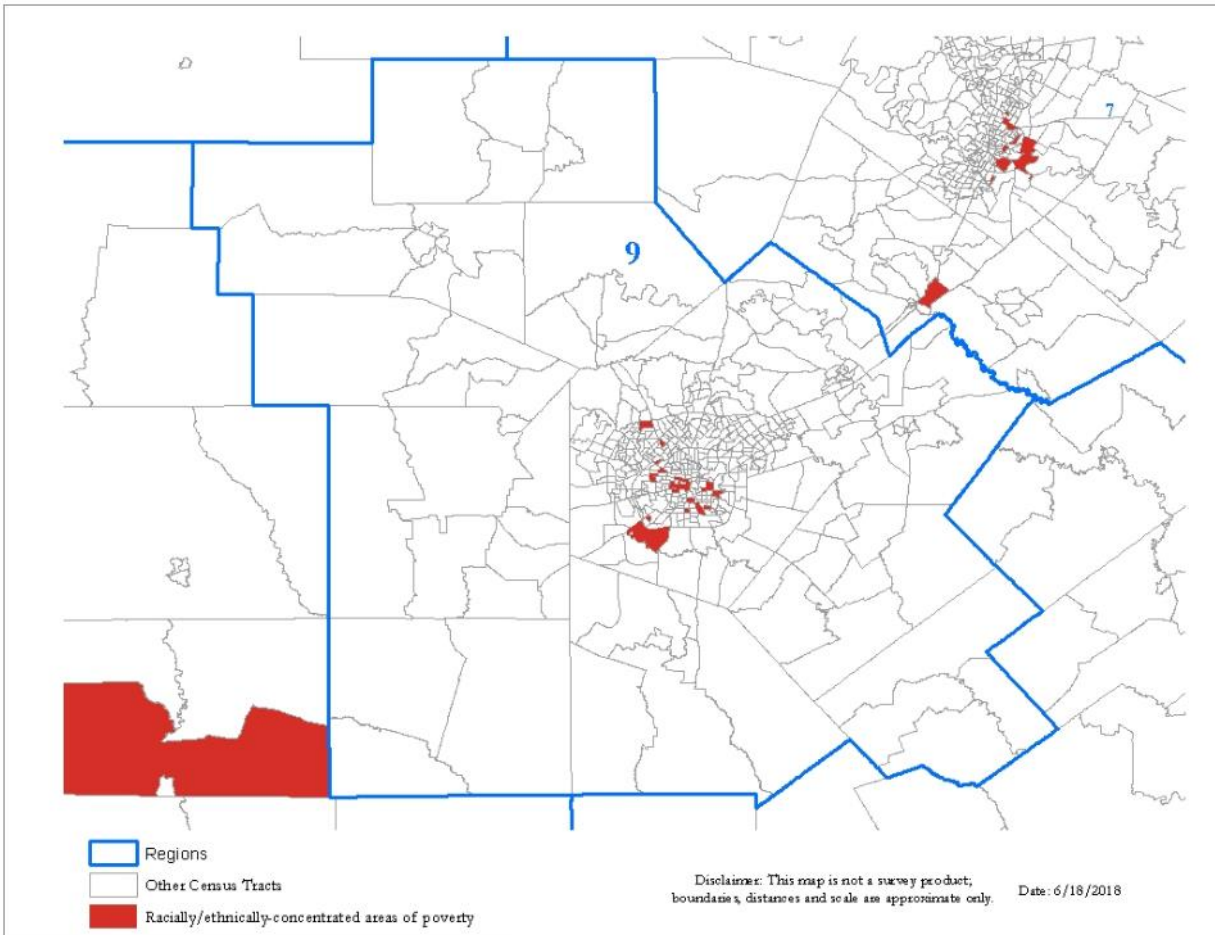




Figure 5-238: Map of R/ECAPS, San Antonio, Region 9, 2018

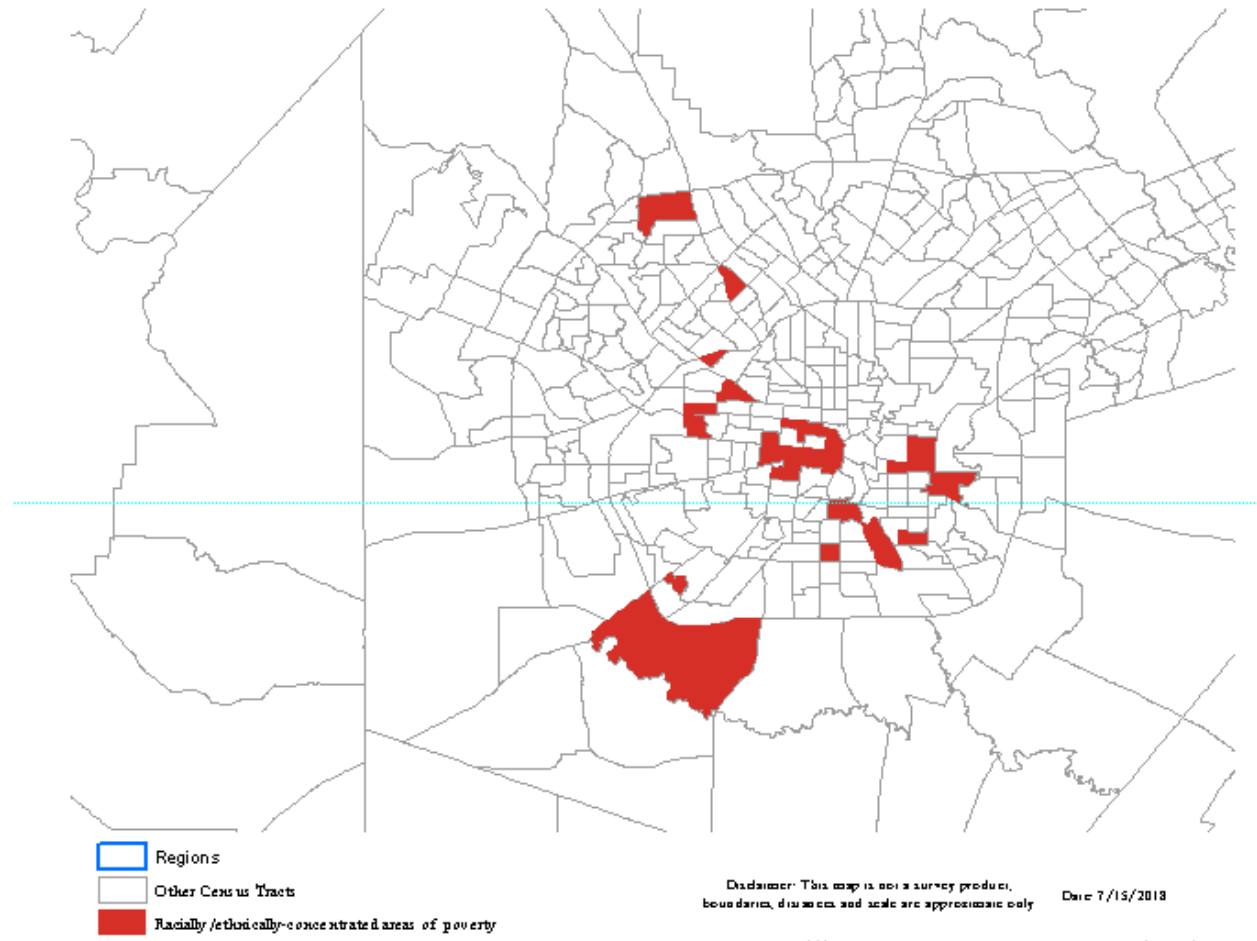
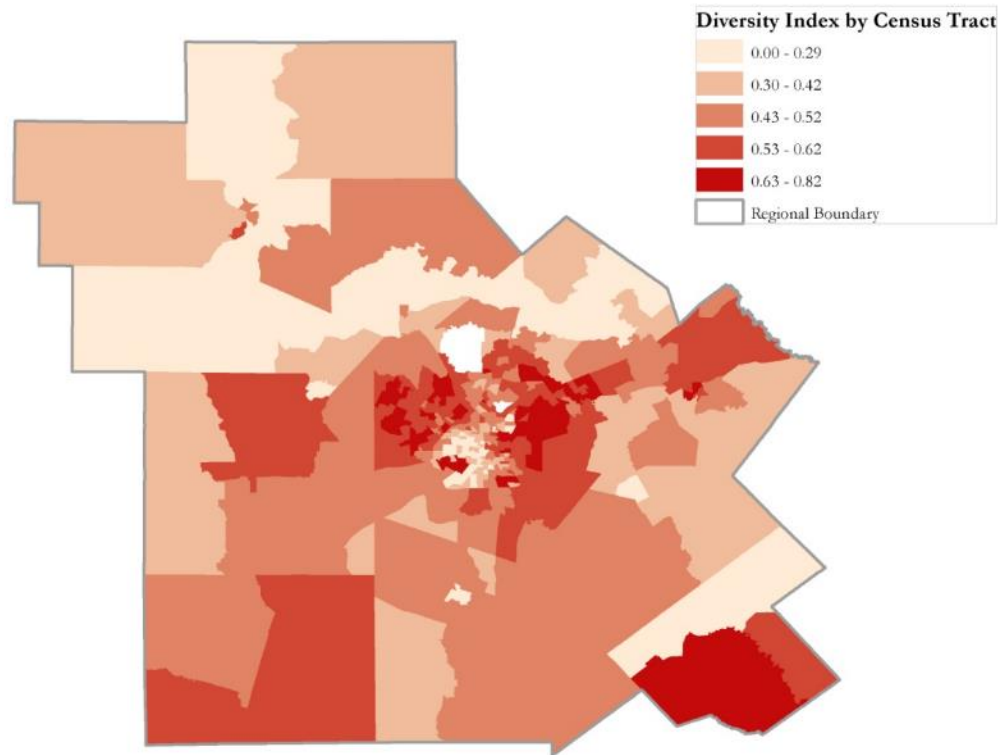


Figure 5-239 shows the Diversity Index by census tract for Region 9.

**Figure 5-239: Diversity Index, Region 9, 2018**



Many R/ECAPs overlap with census tracts that have a high Diversity Index in the San Antonio area. R/ECAPs are spread throughout central San Antonio with a few northwest and southwest of the core. Region 9 has relatively high Diversity Index values across the region, with a few areas with less diversity in the north and southeast portions of the region and southwest San Antonio. Detailed tables of the diversity index by census tract can be found in Appendix E

### **Household Characteristics**

Figure 5-240 shows the household and family characteristics of Region 9 households. Region 9 has very similar family and household characteristics to the state as a whole, particularly the average non-family household size. As with all other regions and statewide, the percent of female-headed households with a minor is greater than the percent of male-headed households with a minor.

**Figure 5-240: Household and Family Characteristics, Region 9, 2012 to 2016**

	Texas	Region 9
Total Households	9,289,554	826,078
Average Household Size	2.84	2.90
Percent of Households with a Minor	37.6%	36.7%
Total Family Households	6,405,049	570,054
Average Family Household Size	3.44	3.53
Average Non-Family Household Size	1.28	1.28

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 9 has very similar family and household characteristics to the state as a whole, particularly the average non-family household size. As with all other regions and statewide, the percent of female-headed households with a minor is greater than the percent of male-headed households with a minor.

### Income

Figure 5-241 displays the percentage of the regional population by household income category and race and ethnicity for Region 9. For both Hispanic and Black or African American households in Region 9, about 30% of households have incomes at or below 50% AMFI, while less than 20% of White and Asian households are at or below the same income category.

**Figure 5-241: Household Income Category by Race and Ethnicity, Region 9, 2010 to 2014**

	Texas	Region 9	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	12.5%	7.9%	18.1%	11.8%	20.2%	10.7%	13.6%	16.1%
VLI	12.2%	11.4%	7.9%	12.1%	7.5%	6.7%	24.2%	11.1%	14.9%
LI	16.8%	16.6%	13.7%	18.0%	13.0%	15.0%	13.4%	15.9%	19.5%
MI	9.5%	9.7%	8.8%	8.9%	9.4%	13.0%	6.0%	10.6%	10.5%
Greater than 100 Percent AMFI	48.5%	49.8%	61.6%	43.0%	58.2%	45.2%	45.6%	48.9%	38.9%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

### Disability

Of the civilian non-institutionalized population of Region 9, 13.7% has a disability, which is slightly higher than state’s rate of 11.6%. Figure 5-242 shows the prevalence of disability by disability

type in Region 9, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 5-242: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 9, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	2,397,011	2,294,179	102,832
Population With a Disability	3,083,141	329,278	310,816	18,462
Percent of Population with a Disability	11.6%	13.7%	13.5%	18.0%
Percent of Population with a Hearing Difficulty	3.4%	4.0%	3.9%	6.2%
Percent of Population with a Vision Difficulty	2.5%	2.8%	2.8%	3.6%
Percent of Population with a Cognitive Difficulty	4.3%	5.3%	5.3%	6.1%
Percent of Population with an Ambulatory Difficulty	6.1%	7.1%	7.0%	9.7%
Percent of Population with a Self-Care Difficulty	2.4%	2.8%	2.7%	3.1%
Percent of Population with an Independent Living Difficulty	3.9%	4.6%	4.6%	5.5%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-243 shows the percent of the civilian non-institutionalized population with a disability in Region 9 by gender and age.

**Figure 5-243: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 9, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Percent of Population with a Disability	11.6%	13.7%	13.5%	18.0%
Percent of Males with a Disability	11.5%	13.9%	13.7%	18.8%
Percent of Female with a Disability	11.8%	13.5%	13.4%	17.1%
Percent of Minors With a Disability	4.2%	5.0%	5.0%	5.2%
Percent of Children Under Age 5 with a Disability	0.8%	1.0%	1.0%	0.6%
Percent of Children Aged 5-17 with a Disability	5.5%	6.4%	6.4%	6.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-244 shows the percent of the civilian non-institutionalized population with a disability in Region 9 by race and ethnicity. While slightly higher, Region 9 rates of disability regardless of race and ethnicity align closely with statewide rates, however, disability rates among Hispanic or Latino individuals is higher than the rates among most other regions for the same population.

**Figure 5-244: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 9, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	13.7%	13.5%	18.0%
White	11.9%	13.8%	13.6%	18.5%
Black or African American	13.4%	15.5%	15.4%	16.6%
American Indian or Alaskan Native	15.8%	19.2%	20.0%	4.5%
Asian	5.7%	7.3%	7.3%	7.8%
Hawaiian or Other Pacific Islander	8.5%	10.4%	10.6%	0.0%
Some Other Race	9.2%	13.3%	13.3%	13.6%
Two or More Races	11.1%	12.7%	12.4%	21.6%
Hispanic or Latino	9.5%	12.8%	12.8%	13.2%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

Region 9 has slightly lower rates of poverty than the state across all poverty levels. Figure 5-245 shows the prevalence of poverty in Region 9 by poverty level.

**Figure 5-245: Poverty Rates by Poverty Level, Region 9, 2012 to 2016**

	Texas	Region 9
Total Population for Whom Poverty Status is Determined	26,334,005	2,392,193
Below 100% Poverty (Overall Poverty Rate)	16.7%	15.9%
Percent below 50% of Poverty	7.0%	6.5%
Below 150% of Poverty	27.3%	26.6%
Below 200% of Poverty	37.2%	36.5%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-246 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 9 by age, gender, and race and ethnicity. Across age, gender, and race and ethnicity, the poverty rate in Region 9 is generally lower than statewide rates. Compared to other regions, Region 9 has one of the higher rates of poverty among American Indian and Alaskan Native individuals at 27.8% and Native Hawaiian and Other Pacific Islander individuals at 19.6%. Hispanic or Latino individuals make up over half of the population in Region 9, which has the third lowest poverty rate among Hispanic or Latino individuals in the state at 20.5%.

**Figure 5-246: Poverty Rates by Age, Gender, and Race and Ethnicity, Region 9, 2012 to 2016**

	Texas	Region 9
Total Population for Whom Poverty Status is Determined	26,334,005	2,392,193
Below 100% Poverty (Overall Poverty Rate)	16.7%	15.9%
Metro County	16.4%	15.9%
Non-Metro County	18.7%	16.8%
Under 18	23.9%	22.8%
Male	15.2%	14.7%
Female	18.2%	17.2%
White	15.5%	14.9%
Black or African American	22.6%	21.2%
American Indian and Alaskan Native	21.2%	27.8%
Asian	11.1%	11.2%
Hawaiian and Other Pacific Islander	14.0%	19.6%
Some Other Race	24.4%	22.3%
Two or More Races	17.2%	17.3%
Hispanic or Latino	24.2%	20.5%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-247 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the San Antonio-New Braunfels, TX CBSA. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. The majority of people in the San Antonio-New Braunfels CBSA tend to live within 25 miles of their job, with only one in five travelling 25 miles or further, one of the lowest rates in the state. This tends to indicate that a majority of people live and work in the area, which is supported by the 620,000 individuals reflected in Figure 5-248 who live and work in Bexar County alone, which accounts for around half of all jobs in the Region.

**Figure 5-247: Share of Job Counts by Distance between Work Census Block and Home Census Block, San Antonio-New Braunfels CBSA, TX, Region 9, 2015**

	Count	Share
Total All Jobs	949,296	100.0%
Less than 10 miles	455,894	48.0%
10 to 24 miles	285,126	30.0%
25 to 50 miles	63,157	6.7%
Greater than 50 miles	145,119	15.3%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-248 shows the employment and living situation of individuals in each county of Region 9. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. Compared to other regions, there is a low degree of mobility in and out of counties in Region 9,

where twice as many people live and work in the same county than commute to another county for work. Jobs are primarily located in the San Antonio area; Bexar County (San Antonio, TX) alone accounts for over 80% of the jobs in the entire region.

**Figure 5-248: Employment and Living Situations, Counties in Region 9, 2015**

County	Lived Outside of County, Worked in County	Lived and Worked in County	Lived in County, Worked Outside of County	Percent that Lived in County and Worked Outside of County
Atascosa	7,265	5,147	12,538	70.9%
Bandera	1,313	1,635	5,674	77.6%
Bexar	200,267	620,495	159,172	20.4%
Comal	32,531	16,450	37,956	69.8%
Frio	4,883	2,234	3,432	60.6%
Gillespie	3,806	6,262	4,562	42.1%
Guadalupe	20,496	14,564	51,528	78.0%
Karnes	4,040	1,706	3,363	66.3%
Kendall	9,085	3,996	11,585	74.4%
Kerr	6,684	10,160	9,273	47.7%
Medina	4,358	4,209	13,687	76.5%
Wilson	3,709	3,776	16,241	81.1%
Total	298,437	690,634	329,011	32.3%

Source: On the map data, 2015, with out of state employment data excluded.

Figure 5-249 shows the mean travel time to work for counties in Region 9, which vary greatly from 15.7 minutes to 35.5 minutes.

**Figure 5-249: Mean Travel Time to Work, Counties in Region 9, 2012 to 2016**

County	Mean travel time to work (minutes)
Atascosa	30.3
Bandera	35.5
Bexar	24.7
Comal	30.8
Frio	15.7
Gillespie	20.2
Guadalupe	26.2
Karnes	22.8
Kendall	30.4
Kerr	19.1
Medina	30.4
Wilson	32.7

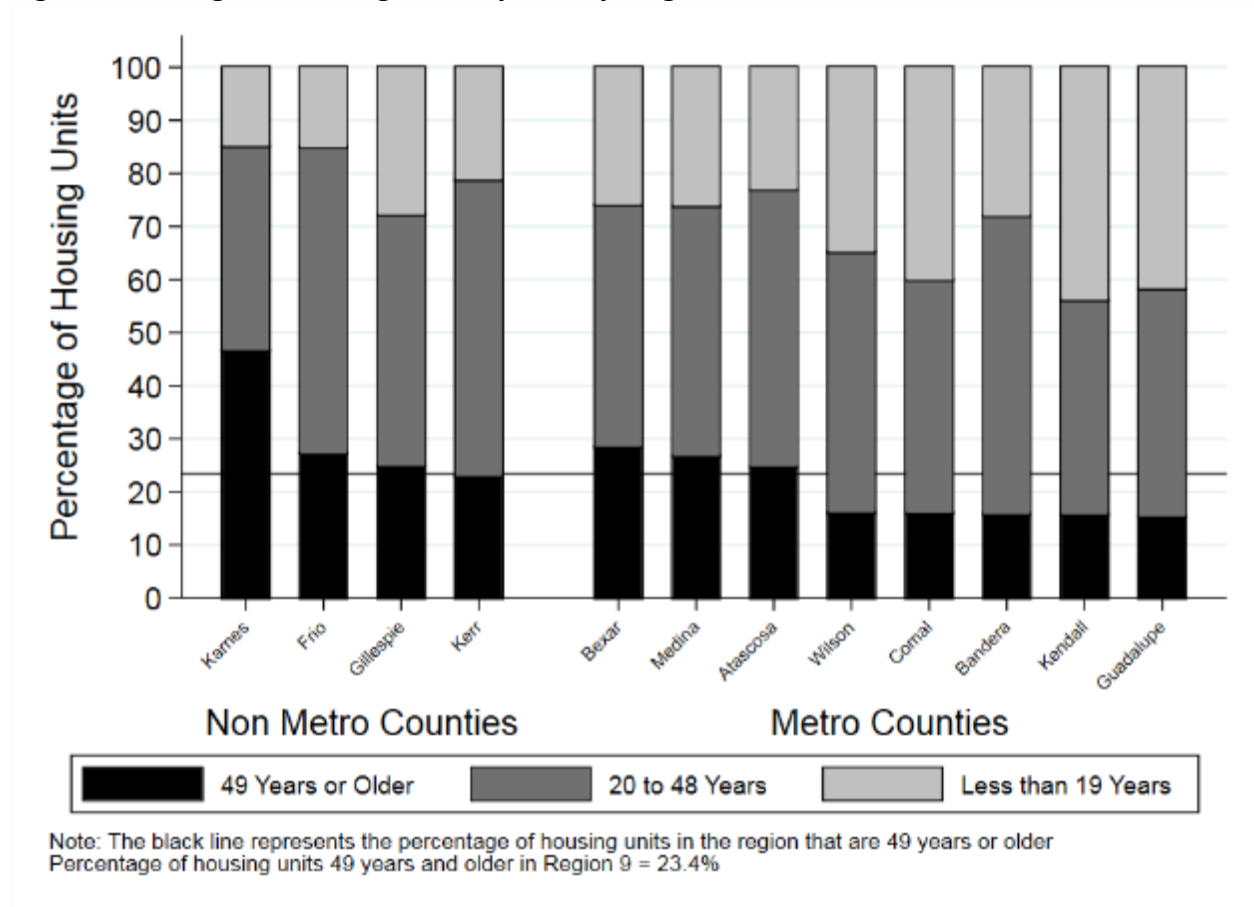
Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

Somewhat higher mean commute times for counties surrounding Bexar County are likely due to the centrality of job locations in the San Antonio area and is likely due to job holders commuting into the San Antonio area for work.

### Housing Profile

Figure 5-250 shows the average age of housing stock by county in Region 9 as a percentage of the total housing stock.

**Figure 5-250: Age of Housing Stock by County, Region 9, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Like other regions with large populations in Metro counties, Region 9 has a younger housing stock than primarily Non-Metro regions, and has a high percentage of units that are newer than 19 years old. Figure 5-251 shows the data visually represented in Figure 5-250 in table form.



**Figure 5-251: Age of Housing Stock by County, Region 9, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Atascosa	24.7%	52.2%	23.1%
Bandera	15.8%	56.2%	28.0%
Bexar	28.5%	45.6%	25.9%
Comal	16.0%	43.9%	40.1%
Frio	27.2%	57.7%	15.1%
Gillespie	24.8%	47.4%	27.8%
Guadalupe	15.3%	42.9%	41.7%
Karnes	46.7%	38.5%	14.9%
Kendall	15.7%	40.4%	43.9%
Kerr	23.0%	55.8%	21.2%
Medina	26.7%	47.1%	26.2%
Wilson	16.1%	49.1%	34.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-252 shows households in Region 9 experiencing one or more housing problems. ELI renter households in Region 9 have higher rates of housing problems in Non-Metro as opposed to Metro counties. Non-Metro households in Region 9 have high rates of experiencing at least one housing problem compared to other regions except for in the MI category. Figure 5-253 shows renter and owner households in Region 9 that lack complete plumbing or kitchen facilities.

**Figure 5-252: Percent of Households with One or More Housing Problems, Region 9, 2010 to 2014**

Households with One or More Housing Problems	Metro	Non-Metro	Region 9 Total	State Total
ELI Renter Households	75.2%	80.2%	75.4%	79.4%
VLI Renter Households	83.3%	73.9%	82.9%	82.7%
LI Renter Households	56.8%	54.5%	56.7%	52.1%
MI Renter Households	24.5%	13.2%	24.0%	24.2%
Renter Households with Incomes Greater than 100% AMFI	9.2%	10.1%	9.3%	8.5%
Percent Total Renter Households	47.5%	45.2%	47.4%	48.2%
ELI Owner Households	72.1%	73.5%	72.2%	73.6%
VLI Owner Households	55.7%	53.1%	55.5%	57.2%
LI Owner Households	41.9%	36.1%	41.5%	42.8%
MI Owner Households	30.5%	23.4%	30.1%	29.0%
Owner Households with Incomes Greater than 100% AMFI	9.4%	9.2%	9.3%	9.1%
Percent Total Owner Households	24.0%	25.7%	24.1%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

**Figure 5-253: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 9, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 9 Total</b>	<b>State Total</b>
ELI Renter Households	2.1%	3.9%	2.1%	2.7%
VLI Renter Households	2.3%	6.0%	2.5%	2.3%
LI Renter Households	1.7%	4.0%	1.8%	1.8%
MI Renter Households	1.7%	2.3%	1.7%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.5%	2.0%	1.5%	1.2%
Percent Total Renter Households	1.8%	3.5%	1.9%	1.9%
ELI Owner Households	2.6%	3.3%	2.6%	2.6%
VLI Owner Households	1.6%	2.7%	1.7%	1.6%
LI Owner Households	0.7%	0.5%	0.7%	0.8%
MI Owner Households	0.5%	0.6%	0.5%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.5%	0.7%	0.5%	0.4%
Percent Total Owner Households	0.7%	1.1%	0.8%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

The percentages of units lacking complete plumbing or kitchen facilities in Region 9 are relatively close to state figures. Region 9 is one of three regions where VLI renter households are more likely to lack complete plumbing or kitchen facilities than ELI renter households. ELI owner households are more likely to lack complete facilities than ELI renter households.

**Figure 5-254: Percent of Households Experiencing Cost Burden, Region 9, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 9 Total</b>	<b>State Total</b>
ELI Renter Households	73.5%	77.7%	73.6%	77.3%
VLI Renter Households	80.2%	71.0%	79.8%	78.1%
LI Renter Households	49.0%	35.9%	48.5%	44.5%
MI Renter Households	17.3%	9.5%	17.0%	17.0%
Renter Households with Incomes Greater than 100% AMFI	4.4%	3.7%	4.3%	4.0%
Percent Total Renter Households	42.8%	37.8%	42.6%	43.3%
ELI Owner Households	70.2%	70.6%	70.3%	70.9%
VLI Owner Households	51.5%	49.3%	51.3%	52.8%
LI Owner Households	36.7%	30.8%	36.3%	37.5%
MI Owner Households	26.1%	19.9%	25.7%	24.3%
Owner Households with Incomes Greater than 100% AMFI	7.1%	6.3%	7.0%	6.9%
Percent Total Owner Households	21.0%	22.3%	21.1%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

## Regional Analysis

Figure 5-254 shows renter and owner households in Region 9 that are cost burdened. Compared to other regions, Region 9 has higher than average rates of cost burden in Non-Metro counties and average rates of cost burden in Metro counties. With 77.7% of ELI renter households in Non-Metro counties cost burdened, Region 9 has the highest rate among all regions for that household type, compared to 73.5% of ELI renter households in Metro counties. Region 9's rates of housing cost burden are relatively close to statewide figures. Figure 5-255 shows renter and owner households in Region 9 that are overcrowded.

**Figure 5-255: Percent of Households Experiencing Overcrowding, Region 9, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 9 Total</b>	<b>State Total</b>
ELI Renter Households	6.9%	12.2%	7.1%	10.0%
VLI Renter Households	9.1%	13.3%	9.3%	10.7%
LI Renter Households	8.4%	17.0%	8.7%	7.9%
MI Renter Households	5.8%	4.5%	5.7%	6.2%
Renter Households with Incomes Greater than 100% AMFI	3.7%	4.3%	3.7%	3.6%
Percent Total Renter Households	6.5%	10.2%	6.6%	7.5%
ELI Owner Households	4.0%	4.7%	4.0%	5.5%
VLI Owner Households	6.2%	3.9%	6.0%	6.1%
LI Owner Households	5.8%	6.2%	5.8%	5.8%
MI Owner Households	4.3%	3.7%	4.3%	4.5%
Owner Households with Incomes Greater than 100% AMFI	1.9%	2.1%	1.9%	1.8%
Percent Total Owner Households Overcrowded	3.2%	3.4%	3.2%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Region 9 has average to somewhat high rates of overcrowding when compared to other regions. Renter households in Non-Metro counties with incomes less than or equal to 80% AMFI have particularly high rates of overcrowding in Region 9. Figure 5-256 shows the average housing costs in Region 9

**Figure 5-256: Average Housing Costs, Region 9, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$948
Average Monthly Rent	\$811

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Region 9 contains the state's second most populous city (San Antonio), but housing costs in Region 9 are lower than those in regions containing other large Texas cities such as Region 3, Region 6, and Region 7. Figure 5-257 shows the number of bedrooms in renter and owner occupied housing units in Region 9.

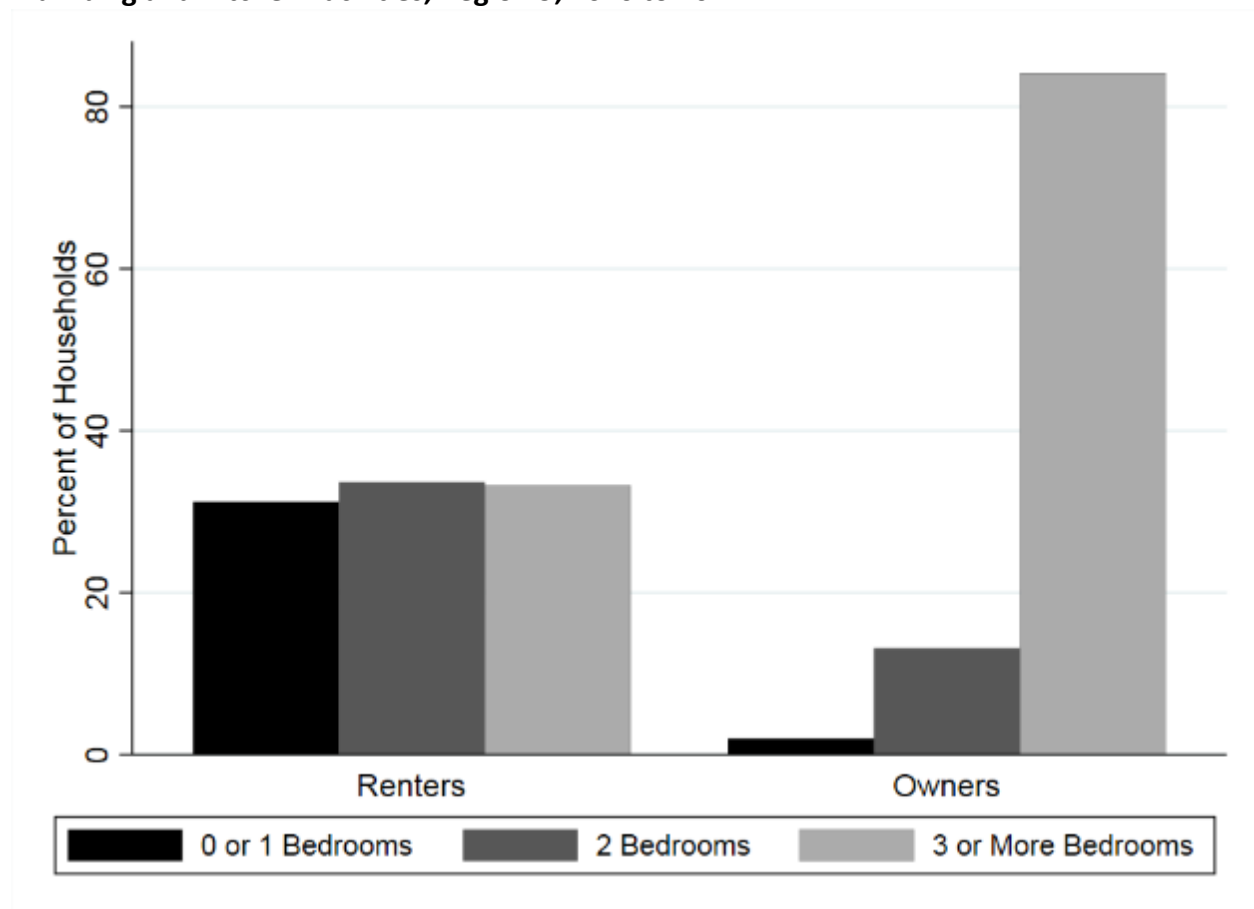
**Figure 5-257: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 9, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	293,341	31.8%	34.3%	33.9%
Owner Occupied	509,202	2.0%	13.2%	84.8%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-258 is a visual representation of the regional data from Figure 5-257.

**Figure 5-258: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 9, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

## Regional Analysis

Region 9, out of all the state regions, most closely matches the state tenure and unit size profile. Unit sizes are well distributed among renter occupied units in Region 9, and more evenly spread than in any other region. Affordability and overcrowding are the key drivers of housing problems in the region. This is less of a problem for owner households, who have access to many larger units with 3 or more bedrooms. Renters in Non-Metro counties may have a hard time finding large enough units without experiencing housing cost burden. Considering the size of the area, and the average family size of over 3.53, the need for affordable rental units with three or more bedrooms may be unmet. Figure 5-259 maps the active multifamily properties in Region 9 participating in TDHCA programs.

**Figure 5-259: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 9, 2018**

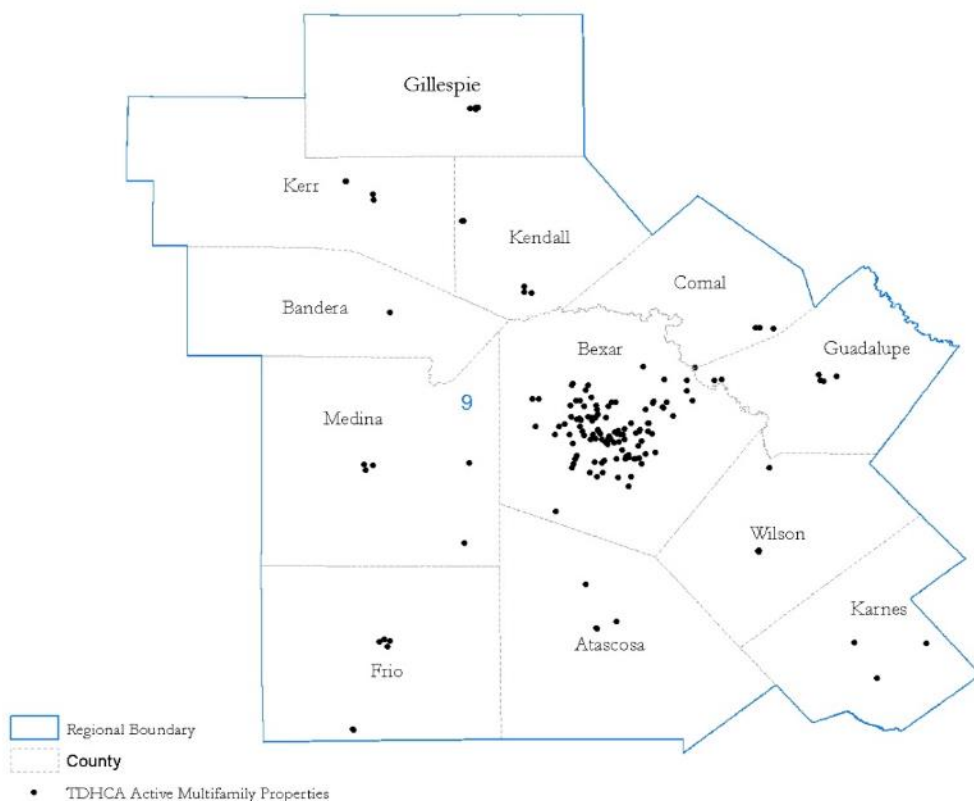


Figure 5-260 shows the number of multifamily properties participating in TDHCA programs by county in Region 9. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-260: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 9, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Atascosa	4	152	152
Bandera	1	76	76
Bexar	125	19,974	18,008
Comal	5	368	358
Frio	7	272	268
Gillespie	6	326	283
Guadalupe	8	784	723
Karnes	3	132	128
Kendall	6	485	473
Kerr	6	401	398
Medina	5	220	216
Wilson	4	218	193
<b>Total</b>	<b>180</b>	<b>23,408</b>	<b>21,276</b>

Source: TDHCA, Central Database, data pull from June 2018.

Bexar County, which contains San Antonio, dominates the region in terms of population, jobs, and active multifamily properties participating in TDHCA programs. Active properties exist in each of the counties in the region.

## Region 10—“Coastal Bend”

**Point of Reference Cities:** Corpus Christi, Victoria, Kingsville

### Geo-Demographic Background

The Coastal Bend was the first area settled by Europeans in Texas when the French established a colony near Matagorda Bay, which prompted the Spanish to also attempt to colonize the region followed by German and Polish settlers. Culturally, the area today is mainly a mix of White and Hispanic or Latino residents and is thought to be the birthplace and epicenter of Mexico-American Tejano music.

Economic activities include ranching, farming, and fishing along the coast. Recently, oil and gas development and exploration is supporting economic growth in the region. There are still historic and large private ranches in the region, most notably the King Ranch. Additionally, tourist destinations include Corpus Christi for its beaches, the Padre Island National Seashore, the Texas State Aquarium, and a naval aviation museum housed on the WWII aircraft carrier, USS Lexington.

The region has a high percentage of persons identifying as Hispanic or Latino contributing to a very diverse demographic. Low income families are often clustered in areas within the major cities.

Figure 5-261 shows the counties of TDHCA Region 10.

**Figure 5-261: State of Texas’ Region 10 Counties**

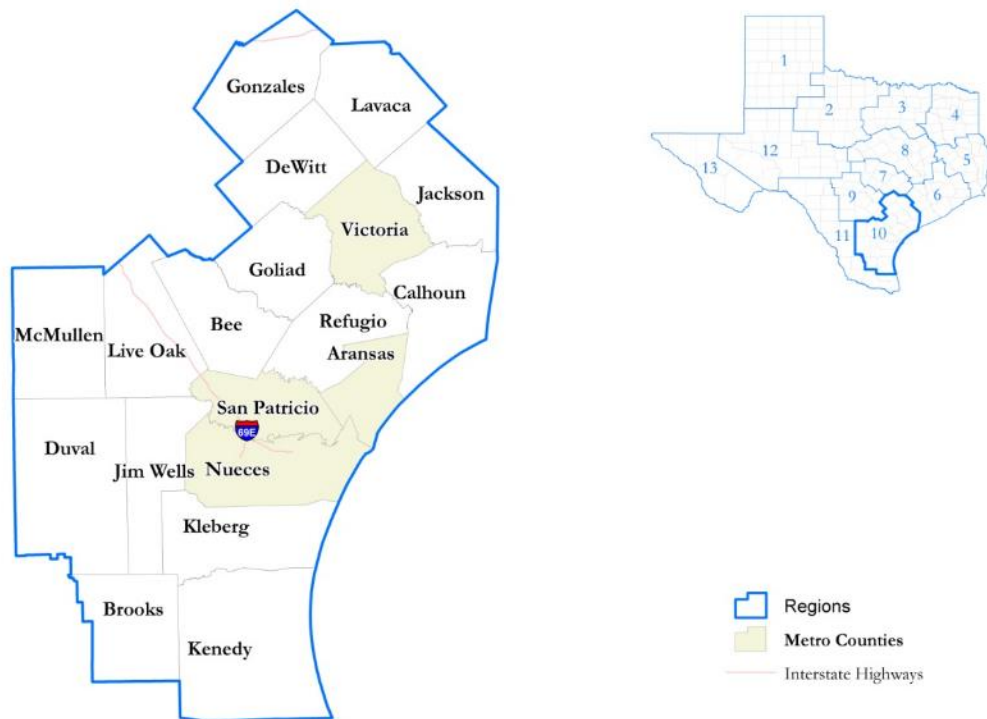


Figure 5-262 displays the population composition of Region 10 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

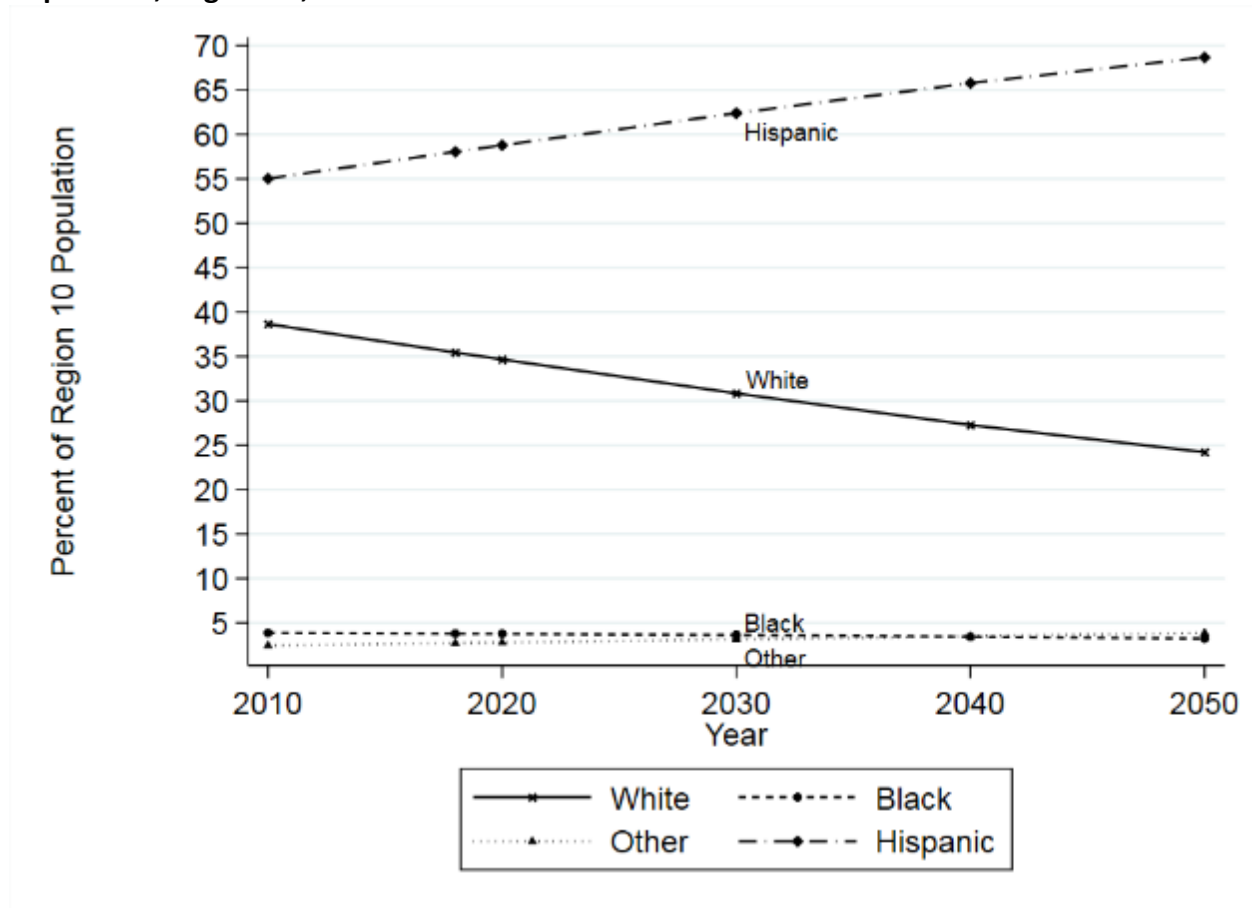
**Figure 5-262: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 10, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	38.7%	3.9%	2.4%	55.0%	760,613
2018	35.4%	3.8%	2.7%	58.0%	809,952
2020	34.7%	3.8%	2.8%	58.8%	822,702
2030	30.8%	3.6%	3.1%	62.4%	881,649
2040	27.3%	3.4%	3.5%	65.8%	925,253
2050	24.2%	3.2%	3.9%	68.7%	964,601

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 10 is currently majority Hispanic. Population projections indicate that this trend is expected to continue. Region 10 is projected to have the third largest percentage of the population identifying as Hispanic by 2050, behind Region 11 and Region 13. Figure 5-263 is a visual representation of Figure 5-262.

**Figure 5-263: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 10, 2010 to 2050**





### Race and Ethnicity

Figure 5-264 shows the R/ECAPs in Region 10. Figure 5-265 and Figure 5-266 show the R/ECAPs in Victoria and Corpus Christi respectively. A list of the census tracts designated as R/ECAPS is available in Appendix Das well.

**Figure 5-264: Map of R/ECAPS, Region 10, 2018**

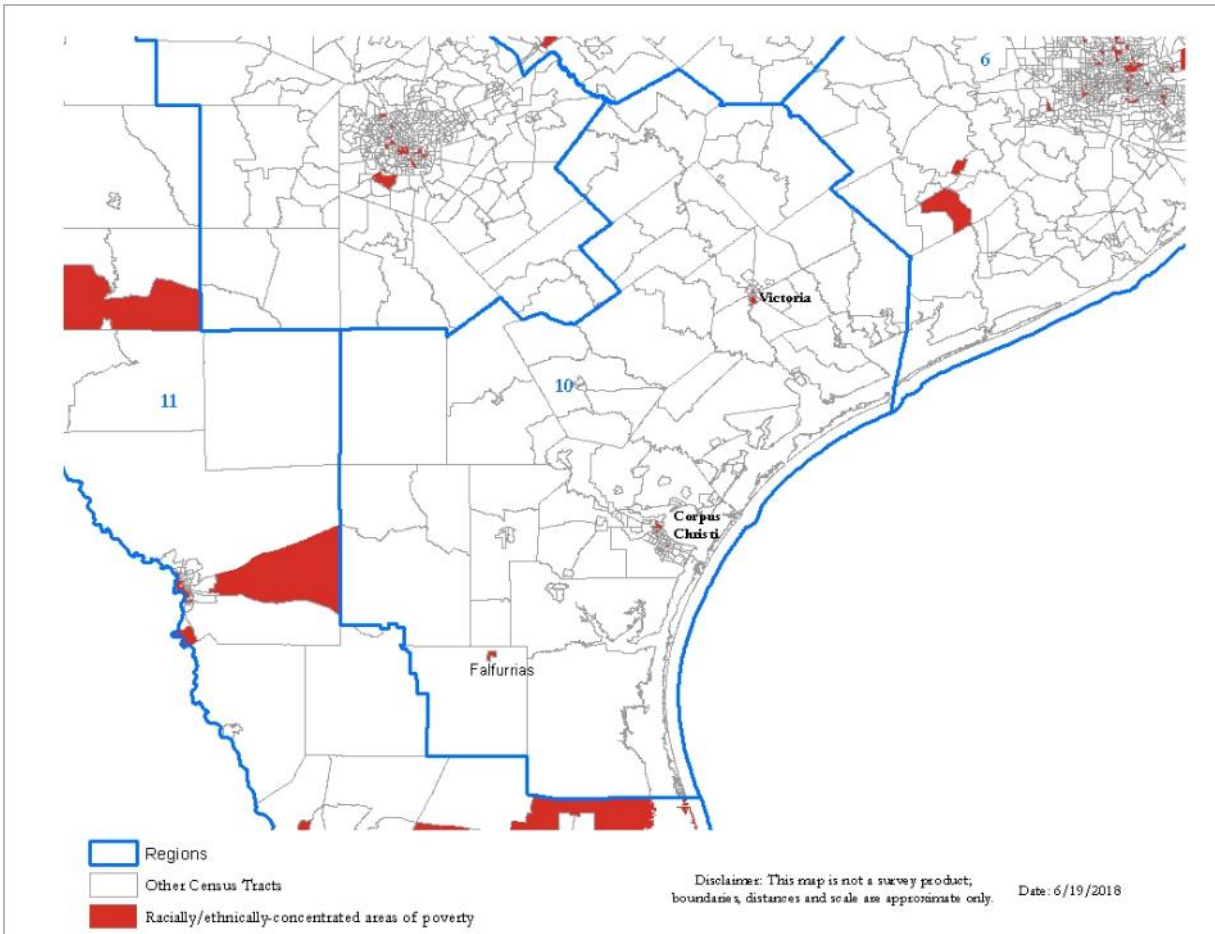


Figure 5-265: Map of R/ECAPS, Victoria, TX, Region 10, 2018

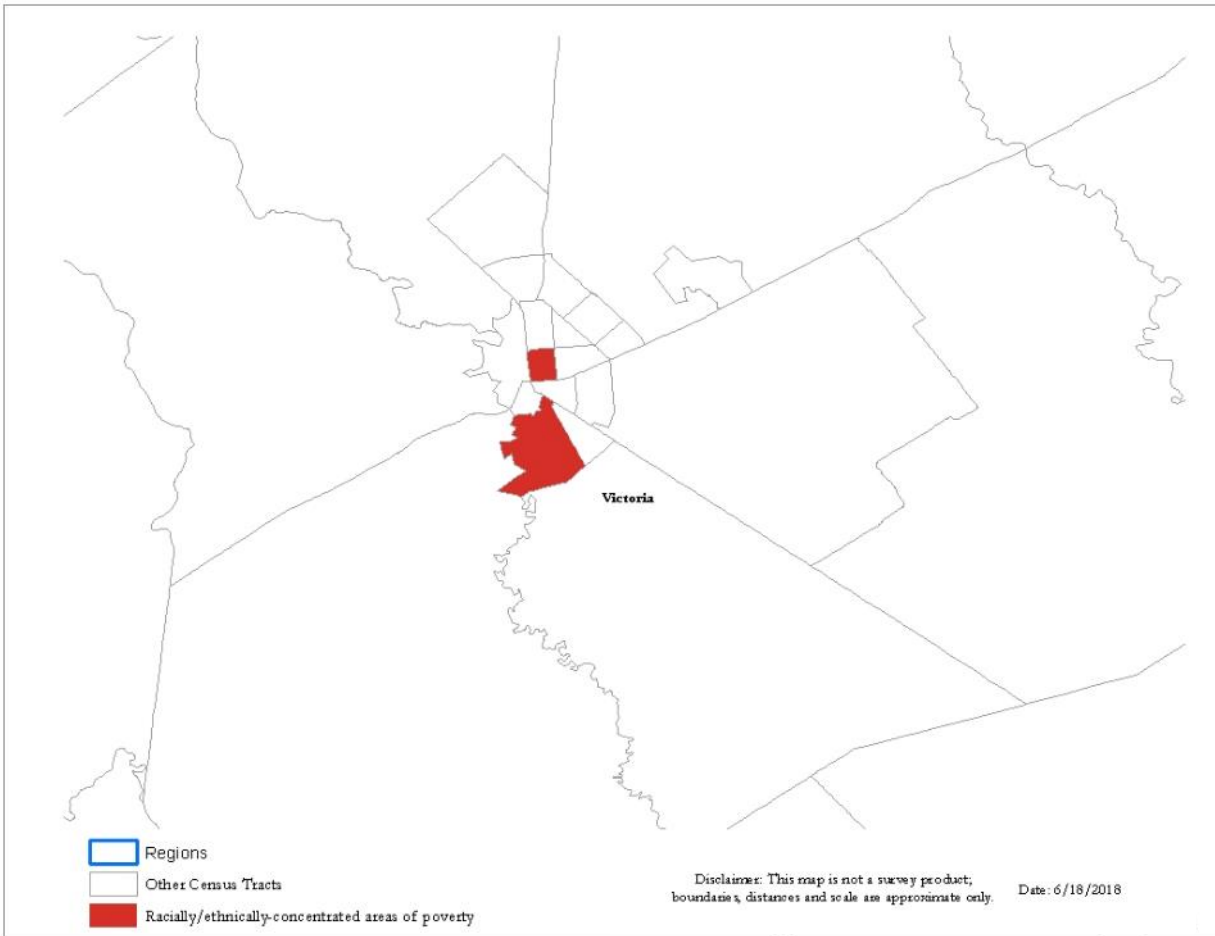


Figure 5-266: Map of R/ECAPS, Corpus Christi, TX, Region 10, 2018

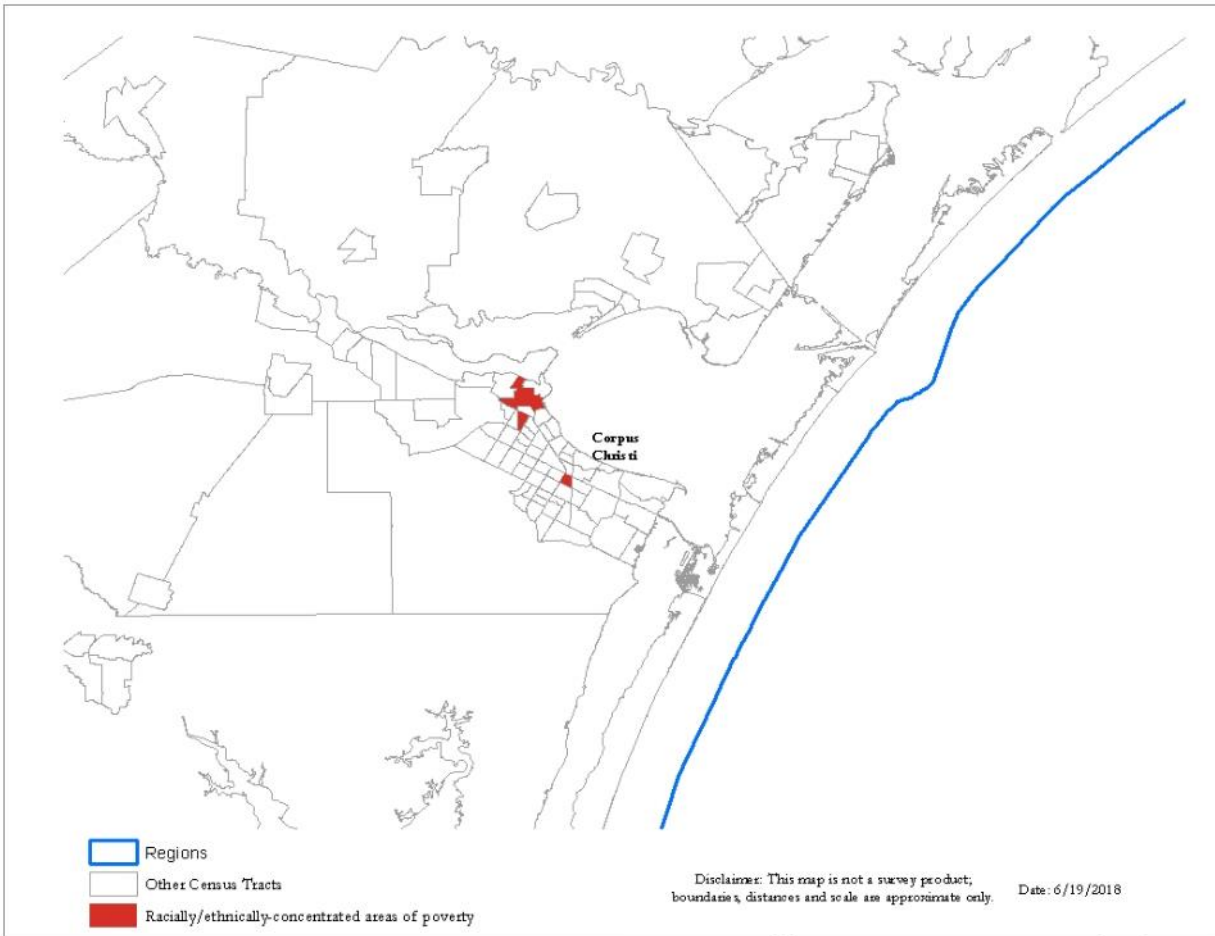
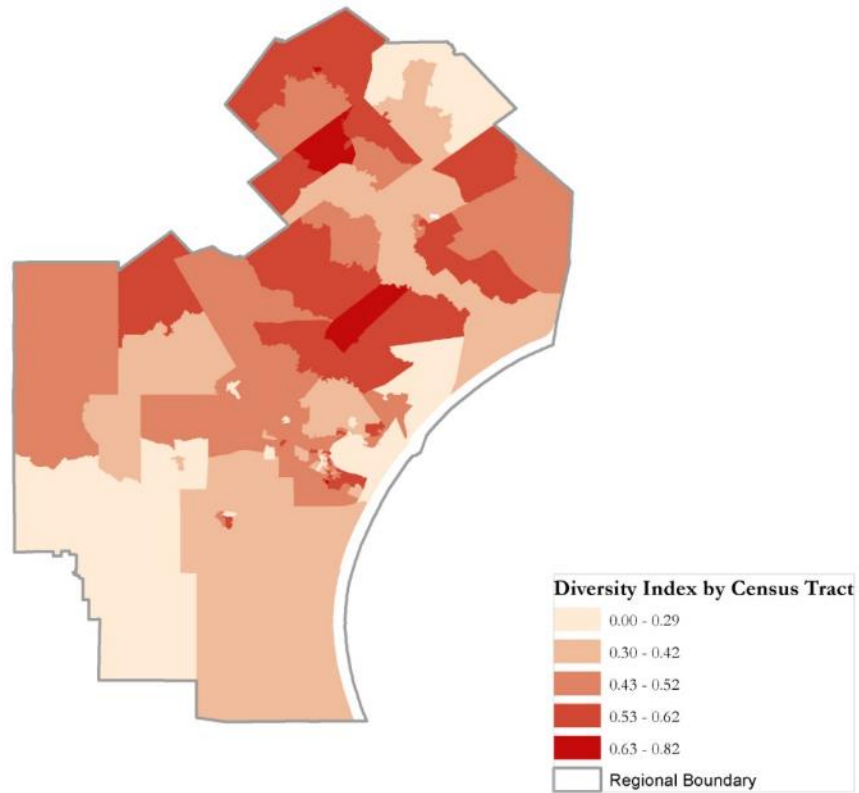


Figure 5-267 shows the Diversity Index by census tract for Region 10.

**Figure 5-267: Diversity Index, Region 10, 2018**



Overall, Region 10 is fairly diverse, particularly in the northern half of the region. Exceptions seem to be some of the coastal areas and some of the far north and south portions of the region. Detailed tables of the diversity index by census tract can be found in Appendix E

### Household Characteristics

Figure 5-268 shows the household and family characteristics of Region 10 households.

**Figure 5-268: Household and Family Characteristics, Region 10, 2012 to 2016**

	Texas	Region 10
Total Households	9,289,554	276,443
Average Household Size	2.84	2.76
Percent of Households with a Minor	37.6%	35.3%
Total Family Households	6,405,049	192,906
Average Family Household Size	3.44	3.31
Average Non-Family Household Size	1.28	1.26

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 10 is similar to the state as a whole based on family and household characteristics. The average household size, average family household size, and percent of households with a minor

in Region 10 are the median values for all regions. Average household, family household, and non-family household sizes are slightly smaller than statewide figures while the percent of households with a minor, male-headed households with a minor, and female-headed households with a minor are slightly larger than statewide figures.

**Income**

Figure 5-269 displays the percentage of the regional population by household income and race and ethnicity for Region 10. Compared to other regions, Hispanic households are not nearly as clustered in the ELI and VLI categories. One in five Black or African American households are in the ELI category. A majority of households who do not identify as Hispanic or Latino or Black or African American have incomes greater than 100% AMFI.

**Figure 5-269: Household Income Category by Race and Ethnicity, Region 10, 2010 to 2014**

	Texas	Region 10	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	12.2%	7.9%	20.2%	12.4%	5.0%	0.0%	15.6%	15.6%
VLI	12.2%	12.3%	9.3%	15.6%	6.5%	9.3%	0.0%	13.6%	14.9%
LI	16.8%	17.0%	14.5%	21.7%	11.3%	21.3%	24.2%	19.4%	19.1%
MI	9.5%	9.0%	8.8%	8.0%	7.1%	9.5%	15.3%	7.3%	9.4%
Greater than 100 Percent AMFI	48.5%	49.4%	59.5%	34.6%	62.7%	54.8%	60.5%	44.1%	41.0%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

**Disability**

Of the civilian non-institutionalized population of Region 10, 15.6% has a disability, higher than state’s rate of 11.6%. There is very little difference between Metro and Non-Metro counties. Figure 5-270 shows prevalence of disability by disability type in Region 10, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Region 10 has a higher rate of ambulatory disabilities than much of the state.

**Figure 5-270: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 10, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Total Civilian Non-Institutionalized Population	26,478,868	766,578	538,345	228,233
Population With a Disability	3,083,141	119,227	78,997	40,230
Percent of Population with a Disability	11.6%	15.6%	14.7%	17.6%
Percent of Population with a Hearing Difficulty	3.4%	4.9%	4.5%	5.7%
Percent of Population with a Vision Difficulty	2.5%	3.5%	3.1%	4.3%
Percent of Population with a Cognitive Difficulty	4.3%	5.6%	5.2%	6.3%
Percent of Population with an Ambulatory Difficulty	6.1%	8.5%	8.2%	9.3%
Percent of Population with a Self-Care Difficulty	2.4%	3.1%	2.9%	3.5%
Percent of Population with an Independent Living Difficulty	3.9%	5.3%	4.7%	6.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-271 shows the percent of the civilian non-institutionalized population with a disability in Region 10 by gender and age. Higher rates of disability amongst children, males, and females compared to statewide figures is consistent with the higher overall rate of disability in Region 10. Children in the Non-Metro counties of Region 10 experience higher rates of disability than children in the Metro counties of the region.

**Figure 5-271: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 10, 2012 to 2016**

<b>Population Group</b>	<b>Texas</b>	<b>Region Total</b>	<b>Metro</b>	<b>Non-Metro</b>
Percent of Population with a Disability	11.6%	15.6%	14.7%	17.6%
Percent of Males with a Disability	11.5%	15.8%	14.9%	17.9%
Percent of Female with a Disability	11.8%	15.3%	14.4%	17.3%
Percent of Minors With a Disability	4.2%	5.7%	5.2%	7.0%
Percent of Children Under Age 5 with a Disability	0.8%	1.0%	0.9%	1.3%
Percent of Children Aged 5-17 with a Disability	5.5%	7.5%	6.8%	9.2%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-272 shows the percent of the civilian non-institutionalized population with a disability in Region 10 by race and ethnicity. Higher rates of disability among almost all races and ethnicities is consistent with the higher overall rate of disability in Region 10 compared to the state and other regions. Region 10 has the highest rate of American Indian and Native Alaskan individuals with a disability among all regions; over one in four American Indian and Native Alaskan individuals in Metro counties have a disability and one in three individuals in Non-Metro counties have a disability. Region 10 also has the highest rate of persons with a disability for Black or African American individuals at 18.4%, Asian individuals at 8.1%, Hawaiian and Other Pacific Islander individuals at 20.7%, individuals identifying as Other Race at 17.0%, and the highest rate of Hispanic individuals at 14.4%.

**Figure 5-272: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 10, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	15.6%	14.7%	17.6%
White	11.9%	15.4%	14.6%	17.3%
Black or African American	13.4%	18.4%	16.9%	22.4%
American Indian or Alaskan Native	15.8%	28.9%	27.6%	33.0%
Asian	5.7%	8.1%	8.6%	6.1%
Hawaiian or Other Pacific Islander	8.5%	20.7%	8.8%	54.9%
Some Other Race	9.2%	17.0%	15.1%	19.1%
Two or More Races	11.1%	16.8%	16.6%	17.3%
Hispanic or Latino	9.5%	14.4%	13.5%	16.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

### Poverty

Region 10 has slightly higher rates of poverty than the state does, but overall rates in Region 10 align closely with state levels. Figure 5-273 shows the prevalence of poverty in Region 10 by poverty level.

**Figure 5-273: Poverty Rates by Poverty Level, Region 10, 2012 to 2016**

	Texas	Region 10
Total Population for Whom Poverty Status is Determined	26,334,005	761,429
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.1%
Below 50% of Poverty	7.0%	6.8%
Below 150% of Poverty	27.3%	27.9%
Below 200% of Poverty	37.2%	38.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-274 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 10 by age, gender, and race and ethnicity. Across age and gender, Region 10 has slightly higher poverty rates than the state. Generally speaking, Region 10 rates of poverty among racial and ethnic minorities are average compared to other regions, however poverty rates for Hispanic and Latino individuals are one of the lower rates in the state. With the exception of Hispanic or Latino individuals, Native Hawaiian and Other Pacific Islander, and persons identifying as Some Other Race, Region 10 has slightly higher poverty rates compared to the state.

**Figure 5-274: Poverty Rates by Age, Gender and Race/Ethnicity, Region 10, 2012 to 2016**

	<b>Texas</b>	<b>Region 10</b>
Total Population for Whom Poverty Status is Determined	26,334,005	761,429
Below 100% Poverty (Overall Poverty Rate)	16.7%	17.1%
Metro County	16.4%	16.3%
Non-Metro County	18.7%	19.0%
Under 18	23.9%	24.2%
Male	15.2%	15.3%
Female	18.2%	18.8%
White	15.5%	16.3%
Black or African American	22.6%	23.5%
American Indian and Alaskan Native	21.2%	22.3%
Asian	11.1%	15.8%
Hawaiian and Other Pacific Islander	14.0%	10.5%
Some Other Race	24.4%	23.1%
Two or More Races	17.2%	21.0%
Hispanic or Latino	24.2%	21.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-275 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Corpus Christi, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 5-275: Share of Job Counts by Distance between Work Census Block and Home Census Block, Corpus Christi CBSA, TX, Region 10, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	183,916	100.0%
Less than 10 miles	96,453	52.4%
10 to 24 miles	34,708	18.9%
25 to 50 miles	11,220	6.1%
Greater than 50 miles	41,535	22.6%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-276 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Victoria, TX CBSA. Despite a relatively sparse population, job holders in both the Corpus Christi CBSA and Victoria CBSA primarily live within 10 miles of where they work. A larger percent of individuals drive more than 50 miles to work in the Victoria CBSA, but overall that number is smaller than in the Corpus Christi CBSA, which contains the majority of jobs in the Region.



**Figure 5-276: Share of Job Counts by Distance between Work Census Block and Home Census Block, Victoria CBSA, TX, Region 10, 2015**

	Count	Share
Total All Jobs	40,122	100.0%
Less than 10 miles	19,292	48.1%
10 to 24 miles	4,617	11.5%
25 to 50 miles	2,802	7.0%
Greater than 50 miles	13,411	33.4%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-277 shows the employment and living situation of individuals in each county of Region 10.

**Figure 5-277: Employment and Living Situations, Counties in Region 10, 2015**

County	Lived Outside of County, Worked in County	Lived and Worked in County	Lived in County, Worked Outside of County	Percent that Lived in County and Worked Outside of County
Aransas	2,854	2,711	5,865	68.4%
Bee	3,813	3,970	6,507	62.1%
Brooks	1,169	740	2,035	73.3%
Calhoun	6,518	4,045	4,994	55.2%
DeWitt	4,189	3,074	5,204	62.9%
Duval	2,179	900	2,674	74.8%
Goliad	839	486	2,194	81.9%
Gonzales	3,595	3,367	4,940	59.5%
Jackson	3,164	2,018	3,660	64.5%
Jim Wells	11,744	7,489	8,341	52.7%
Kenedy	154	16	370	95.9%
Kleberg	5,734	5,281	6,787	56.2%
Lavaca	3,067	3,268	5,678	63.5%
Live Oak	2,695	1,091	2,646	70.8%
McMullen	469	89	223	71.5%
Nueces	55,196	104,575	41,061	28.2%
Refugio	1,426	959	1,813	65.4%
San Patricio	10,254	8,326	19,786	70.4%
Victoria	16,821	21,976	18,446	45.6%
Total	135,880	174,381	143,224	45.1%

Source: On the map data, 2015, with out of state employment data excluded.

Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There

is a high degree of mobility in and out of counties in Region 10. Nueces County (where Corpus Christi is located) has a majority of the jobs in the Region. Figure 5-278 shows the mean travel time to work for counties in Region 10. Despite the relatively sparse population, a large number of individuals tend to live and work in the same county, with just a few exceptions. This is reflected in the relatively low mean travel times; a majority of travel times are under 25 minutes.

**Figure 5-278: Mean Travel Time to Work, Counties in Region 10, 2012 to 2016**

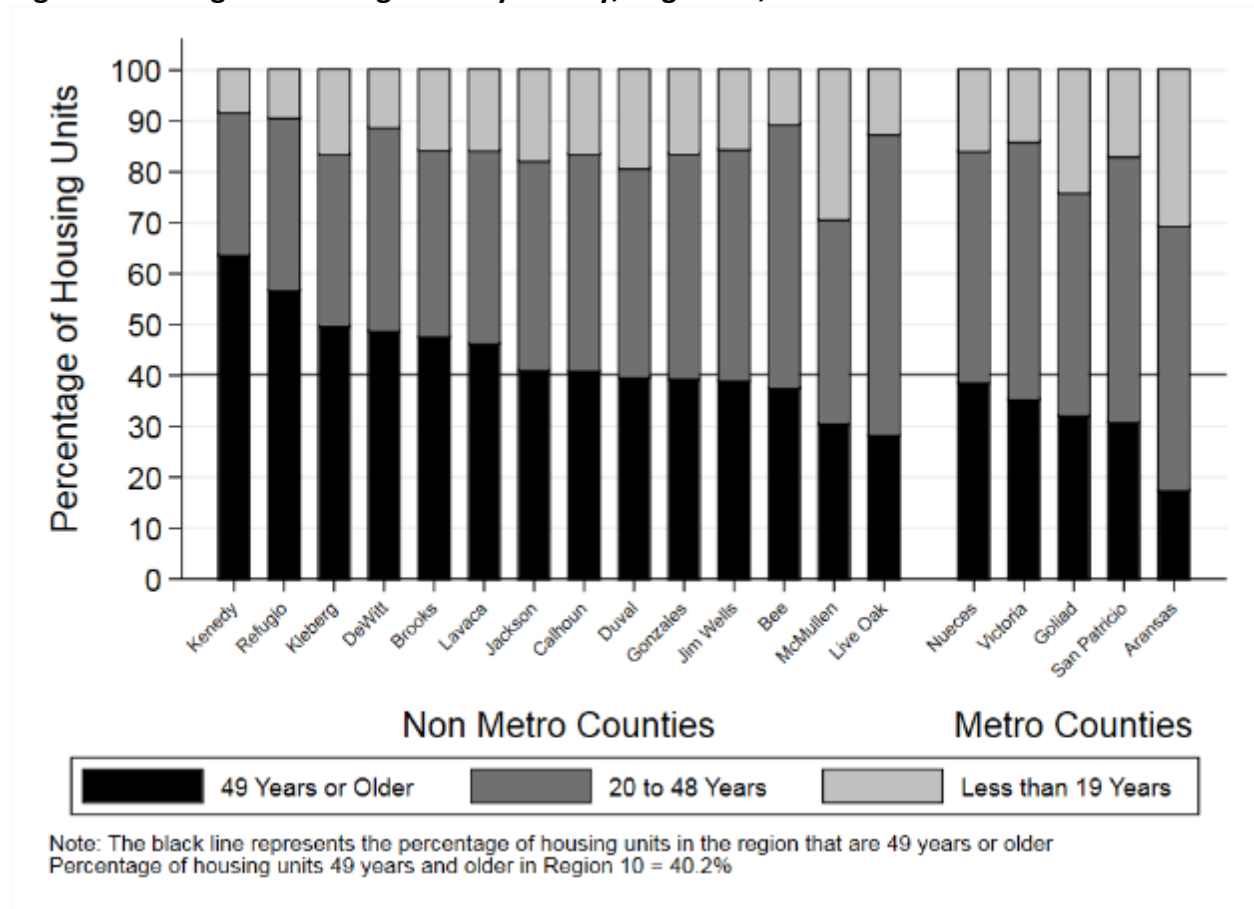
<b>County</b>	<b>Mean travel time to work (minutes)</b>
Aransas	21
Bee	21.5
Brooks	20.9
Calhoun	21.9
DeWitt	23.8
Duval	28.2
Goliad	27.3
Gonzales	22.4
Jackson	25.1
Jim Wells	27.5
Kenedy	17.3
Kleberg	17.7
Lavaca	27
Live Oak	32.4
McMullen	16
Nueces	19.8
Refugio	23
San Patricio	23.2
Victoria	20.4

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 5-279 shows the age of housing stock by county in Region 10 as a percentage of the total housing stock.

Figure 5-279: Age of Housing Stock by County, Region 10, 2012 to 2016



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Region 10 has relatively old housing stock; 40.2% of housing units are 49 years old or older. Even the Metro counties of Region 10 have a high percentage of older housing stock. Figure 5-280 shows the data visually represented in Figure 5-279 in table form. Figure 5-281 shows households in Region 10 experiencing one or more housing problems.

**Figure 5-280: Age of Housing Stock by county, Region 10, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Aransas	17.4%	51.9%	30.6%
Bee	37.6%	51.8%	10.7%
Brooks	47.6%	36.7%	15.7%
Calhoun	40.9%	42.6%	16.5%
DeWitt	48.7%	40.0%	11.2%
Duval	39.6%	41.1%	19.3%
Goliad	32.1%	43.8%	24.1%
Gonzales	39.4%	44.2%	16.4%
Jackson	41.0%	41.1%	17.8%
Jim Wells	39.0%	45.4%	15.5%
Kenedy	63.7%	28.1%	8.3%
Kleberg	49.7%	33.8%	16.5%
Lavaca	46.3%	37.9%	15.8%
Live Oak	28.3%	59.2%	12.6%
McMullen	30.5%	40.1%	29.3%
Nueces	38.6%	45.5%	15.9%
Refugio	56.8%	33.9%	9.4%
San Patricio	30.9%	52.2%	17.0%
Victoria	35.4%	50.6%	14.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

**Figure 5-281: Percent of Households with One or More Housing Problems, Region 10, 2010 to 2014**

Households with One or More Housing Problems	Metro	Non-Metro	Region 10 Total	State Total
ELI Renter Households	79.3%	68.4%	76.1%	79.4%
VLI Renter Households	85.3%	67.4%	80.9%	82.7%
LI Renter Households	55.6%	40.6%	52.0%	52.1%
MI Renter Households	33.7%	29.9%	32.9%	24.2%
Renter Households with Incomes Greater than 100% AMFI	10.5%	8.8%	10.1%	8.5%
Percent Total Renter Households	48.3%	41.3%	46.6%	48.2%
ELI Owner Households	69.7%	65.6%	68.2%	73.6%
VLI Owner Households	53.9%	39.8%	48.4%	57.2%
LI Owner Households	37.2%	25.9%	33.1%	42.8%
MI Owner Households	28.3%	16.7%	24.4%	29.0%
Owner Households with Incomes Greater than 100% AMFI	8.9%	8.6%	8.8%	9.1%
Percent Total Owner Households	22.7%	20.7%	22.1%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

## Regional Analysis

Region 10 has particularly high rates of MI renter households experiencing one or more housing problems compared to other regions. Figure 5-282 shows renter and owner households in Region 10 that lack complete plumbing or kitchen facilities.

**Figure 5-282: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 10, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 10 Total</b>	<b>State Total</b>
ELI Renter Households	5.4%	2.5%	4.5%	2.7%
VLI Renter Households	3.6%	4.5%	3.8%	2.3%
LI Renter Households	1.6%	1.7%	1.6%	1.8%
MI Renter Households	0.8%	1.8%	1.0%	1.4%
Renter Households with Incomes Greater than 100% AMFI	0.8%	1.4%	0.9%	1.2%
Percent Total Renter Households	2.3%	2.3%	2.3%	1.9%
ELI Owner Households	3.4%	3.1%	3.3%	2.6%
VLI Owner Households	2.3%	2.9%	2.5%	1.6%
LI Owner Households	0.8%	1.5%	1.0%	0.8%
MI Owner Households	1.1%	2.1%	1.4%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.3%	0.9%	0.5%	0.4%
Percent Total Owner Households	0.8%	1.5%	1.0%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Households with incomes greater than 30% AMFI are more likely to lack complete plumbing or kitchen facilities in Non-Metro counties than households in the same income category in Metro counties in Region 10, with the reverse being true for ELI households.

**Figure 5-283: Percent of Households Experiencing Cost Burden, Region 10, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 10 Total</b>	<b>State Total</b>
ELI Renter Households	76.6%	64.6%	73.1%	77.3%
VLI Renter Households	80.5%	59.7%	75.4%	78.1%
LI Renter Households	51.4%	30.9%	46.5%	44.5%
MI Renter Households	25.8%	16.5%	23.9%	17.0%
Renter Households with Incomes Greater than 100% AMFI	4.7%	1.4%	3.9%	4.0%
Percent Total Renter Households	43.4%	33.9%	41.0%	43.3%
ELI Owner Households	67.1%	62.0%	65.2%	70.9%
VLI Owner Households	50.0%	33.9%	43.7%	52.8%
LI Owner Households	33.2%	18.8%	28.0%	37.5%
MI Owner Households	22.5%	11.2%	18.7%	24.3%
Owner Households with Incomes Greater than 100% AMFI	6.6%	3.7%	5.7%	6.9%
Percent Total Owner Households	19.7%	15.4%	18.3%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

## Regional Analysis

Rates for households lacking facilities are average to slightly high for owner households compared to other regions and state figures. Lower income renter households have high rates of lacking plumbing or kitchen facilities while higher income renter households have low rates compared to other regions. Renter households with incomes greater than 100% AMFI have the lowest rate of lacking plumbing or kitchen facilities in Region 10. Figure 5-283 shows renter and owner households in Region 10 that are cost burdened. Region 10 has high rates of cost burden among MI renter households compared to other regions, but otherwise relatively low rates of cost burden. Region 10 ELI owner households in particular have lower rates of cost burden than in other regions. Households in Metro counties have a higher rate of cost burden than households in Non-Metro counties. Figure 5-284 shows renter and owner households in Region 10 that are overcrowded.

**Figure 5-284: Percent of Households Experiencing Overcrowding, Region 10, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 10 Total</b>	<b>State Total</b>
ELI Renter Households	9.5%	6.6%	8.7%	10.0%
VLI Renter Households	10.9%	14.0%	11.6%	10.7%
LI Renter Households	6.6%	11.0%	7.6%	7.9%
MI Renter Households	6.9%	11.4%	7.9%	6.2%
Renter Households with Incomes Greater than 100% AMFI	5.1%	6.1%	5.4%	3.6%
Percent Total Renter Households	7.4%	8.9%	7.8%	7.5%
ELI Owner Households	3.5%	5.5%	4.2%	5.5%
VLI Owner Households	5.1%	4.1%	4.7%	6.1%
LI Owner Households	3.8%	6.5%	4.7%	5.8%
MI Owner Households	5.2%	4.3%	4.9%	4.5%
Owner Households with Incomes Greater than 100% AMFI	2.2%	4.2%	2.8%	1.8%
Percent Total Owner Households Overcrowded	3.0%	4.7%	3.5%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Overall, Region 10 has average rates of overcrowding compared to other regions. With a few exceptions, overcrowding in Region 10 is worse for renter households in Non-Metro counties. VLI, LI, and MI renter households in Non-Metro counties in particular have high rates of overcrowding compared to other household types. Region 10 has the second worst rate of overcrowding among renter households with incomes greater than 100% AMFI at 5.4%, behind Region 11 at 8.1%. Figure 5-285 shows the average housing costs in Region 10.

**Figure 5-285: Average Housing Costs, Region 10, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$661
Average Monthly Rent	\$718

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Consistent with other less populated regions, housing costs in Region 10 are fairly low. Figure 5-286 shows the number of bedrooms in renter and owner occupied housing units in Region 10.

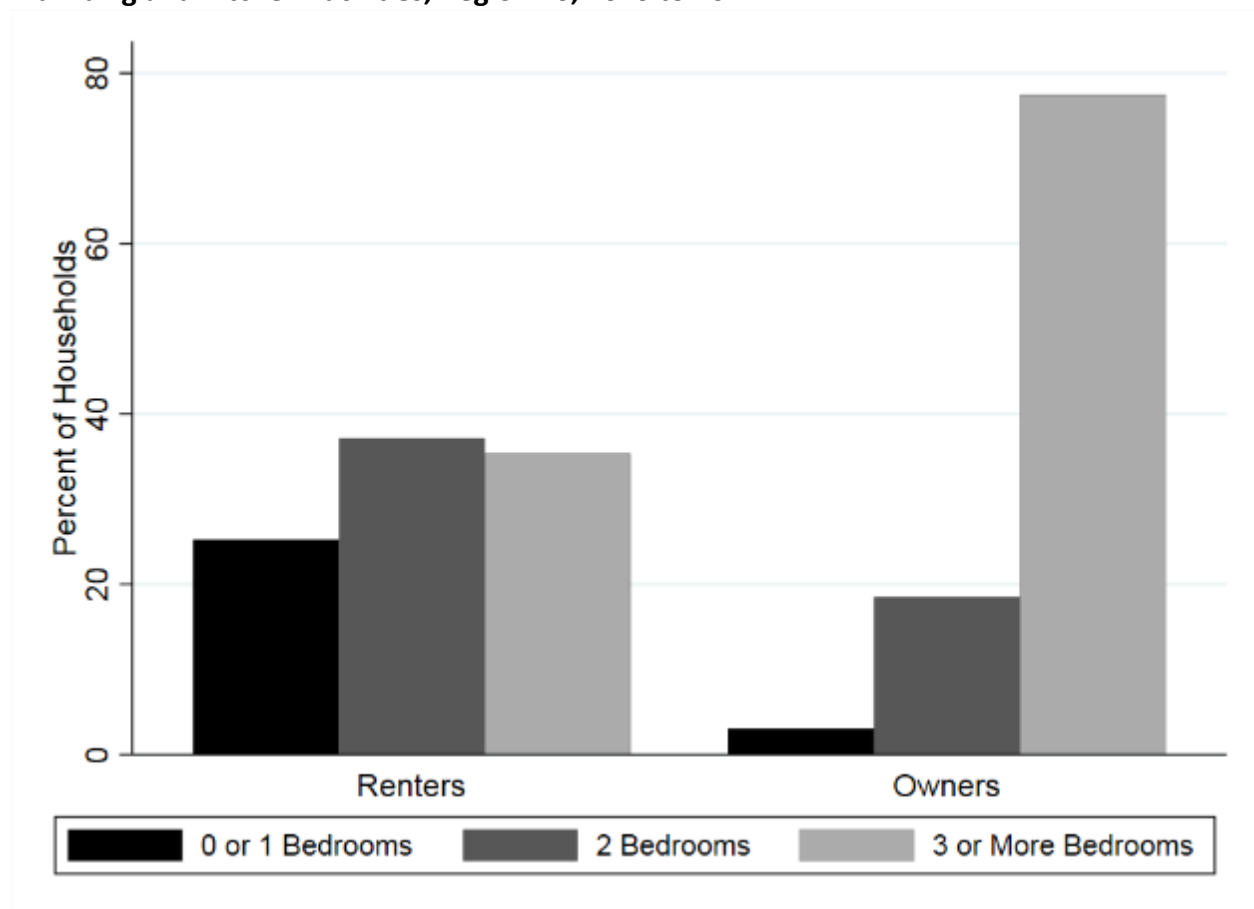
**Figure 5-286: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 10, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	96,041	25.8%	38.0%	36.2%
Owner Occupied	173,387	3.1%	18.7%	78.3%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-287 is a visual representation of the regional data from Figure 5-286.

**Figure 5-287: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 10, 2010 to 2014**

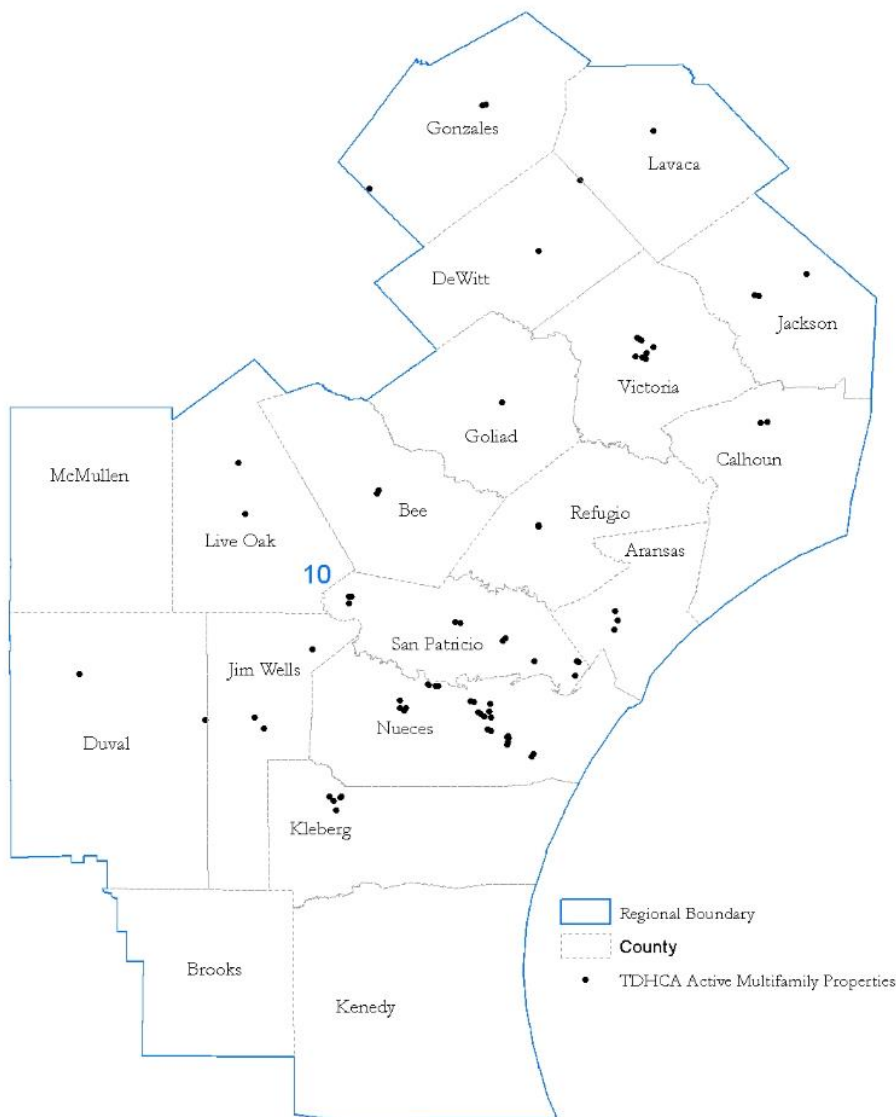


Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

## Regional Analysis

Region 10 has the third lowest percentage of 3 or more bedroom units regardless of tenure, at 63.3% (63.28%), behind Region 7, at 62.1%, and Region 2, at 63.3% (63.26%). Of total occupied units in Region 10, 50.4% are owner occupied units with 3 or more bedrooms, the second lowest percentage among all regions, also behind Region 7 at 49.6%. This might suggest larger households having a more difficult time finding appropriately sized housing, which could encourage overcrowding. Figure 5-288 maps the active multifamily properties in Region 10 participating in TDHCA programs.

**Figure 5-288: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 10, 2018**





## Regional Analysis

Figure 5-289 shows the number of multifamily properties participating in TDHCA programs by county in Region 10. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-289: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 10, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Aransas	3	154	154
Bee	3	180	180
Calhoun	3	262	262
De Witt	1	56	48
Duval	2	49	49
Goliad	1	32	32
Gonzales	3	129	119
Jackson	4	120	106
Jim Wells	4	220	220
Kleberg	5	478	476
Lavaca	2	64	64
Live Oak	3	108	101
Nueces	32	3,645	3,553
Refugio	2	68	46
San Patricio	11	590	549
Victoria	9	876	835
<b>Total</b>	<b>88</b>	<b>7,031</b>	<b>6,794</b>

Source: TDHCA, Central Database, data pull from June 2018.

Active multifamily properties participating in TDHCA programs are concentrated in and around Nueces County, which contains the majority of Corpus Christi. Most counties within the region have at least one active multifamily property.

## Region 11—“South Texas Border”

**Point of Reference Cities:** Del Rio, Laredo, Harlingen, Brownsville, McAllen, South Padre Island

### Geo-Demographic Background

This region encompasses the southern border between Texas and Mexico, and the population is majority Hispanic or Latino. The region’s economy is based on trade and business operations between the two countries, tourism, manufacturing, natural gas, oil, food processing, and other agribusinesses. The City of Brownsville in Cameron County also serves as a major gateway to and from Mexico for tourists and shoppers. One of only three federally recognized tribes that reside in Texas, the Kickapoo tribe, resides in Maverick County in Eagle Pass.

Outside of population centers are communities of Mexican-American and immigrant families called “colonias.” These small communities often operate outside of municipal control, and may lack one or more of running water, sewer, paved roads or city services. Figure 5-290 shows the counties of TDHCA Region 11.

**Figure 5-290: State of Texas’ Region 11 Counties**

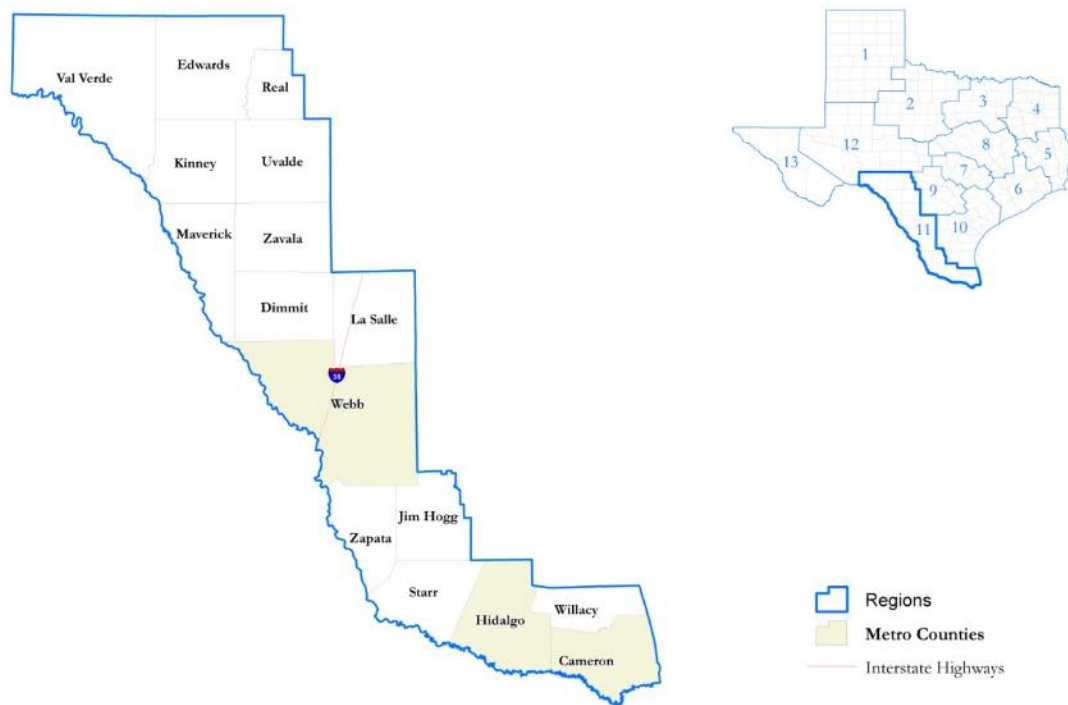


Figure 5-291 displays the population composition of Region 11 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

**Figure 5-291: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 11, 2010 to 2050**

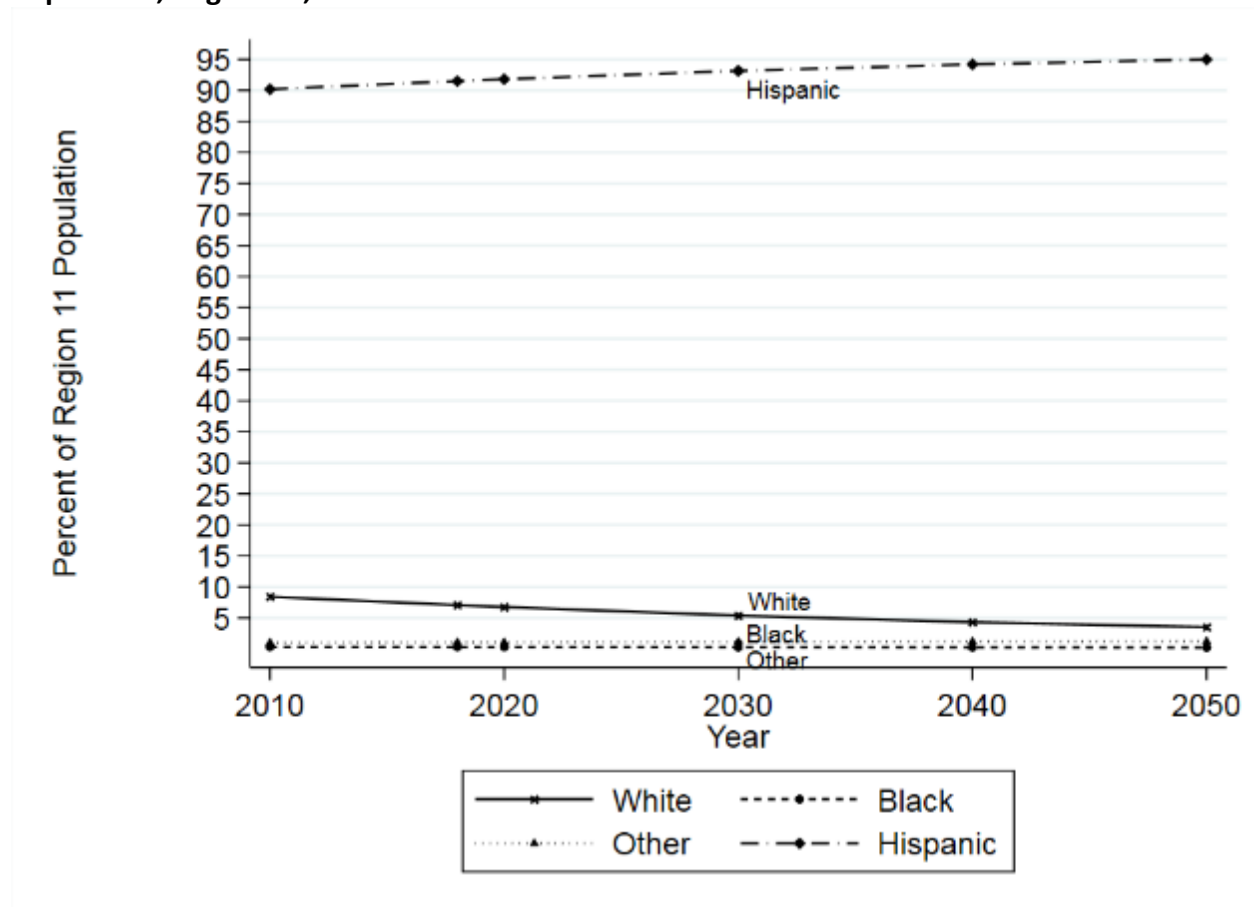
Year	White	Black	Other	Hispanic	Total
2010	8.4%	0.3%	1.0%	90.2%	1,700,723
2018	7.1%	0.3%	1.1%	91.5%	1,968,884
2020	6.8%	0.3%	1.1%	91.8%	2,041,381
2030	5.4%	0.3%	1.1%	93.2%	2,419,109
2040	4.3%	0.3%	1.2%	94.2%	2,798,321
2050	3.5%	0.2%	1.2%	95.0%	3,193,455

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

The Texas Demographic Center projects high population growth rates in Region 11. The region is currently majority Hispanic and this trend is projected to continue. Region 11 is projected to have the largest proportion of residents identifying as Hispanic or Latino and the smallest proportion of residents identifying as Black or African American and White by 2050.

Figure 5-292 is a visual representation of Figure 5-291.

**Figure 5-292: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 11, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

### Race and Ethnicity

Figure 5-293 shows the R/ECAPS in Region 11. A list of the census tracts designated as R/ECAPS is available in Appendix D as well.

**Figure 5-293: Map of R/ECAPS, Region 11, 2018**

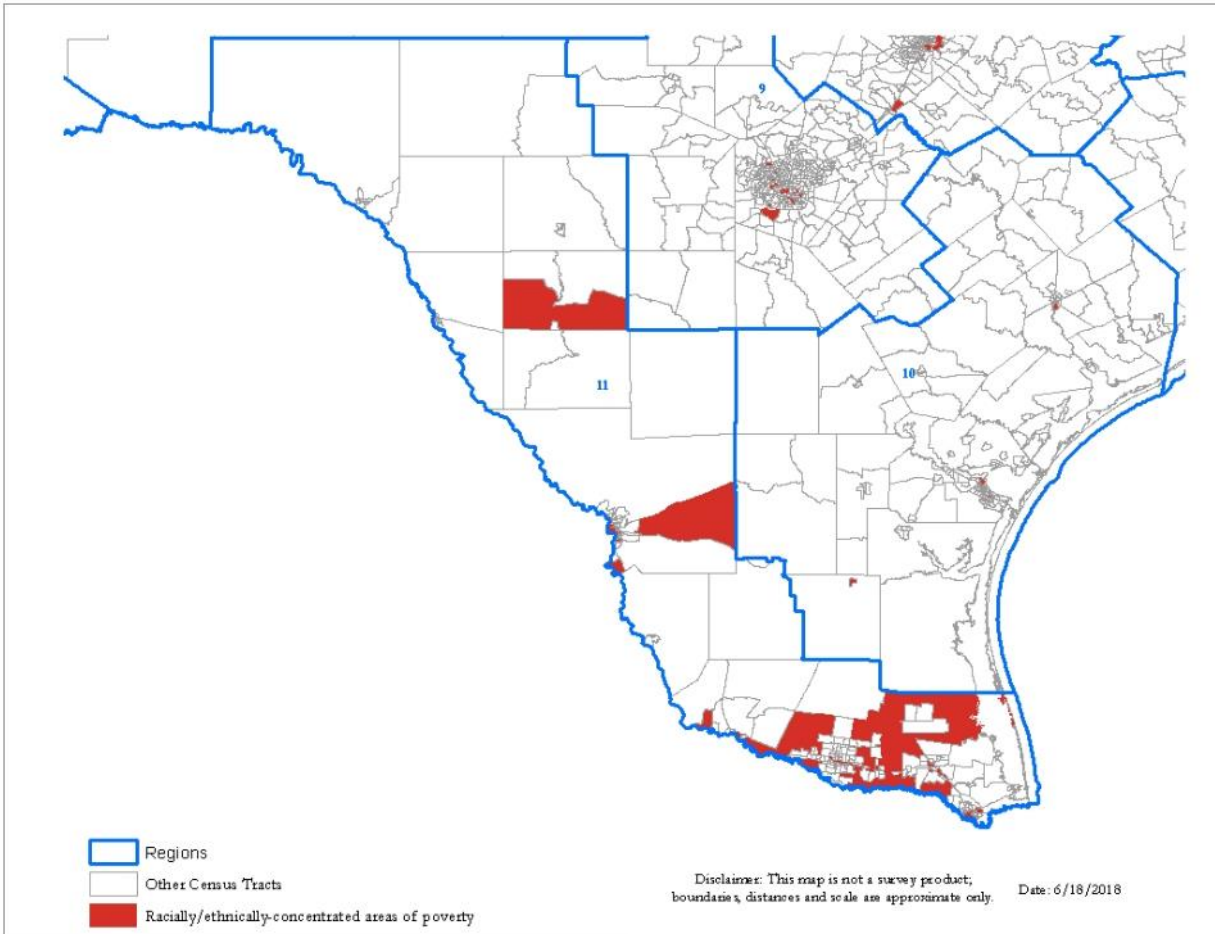
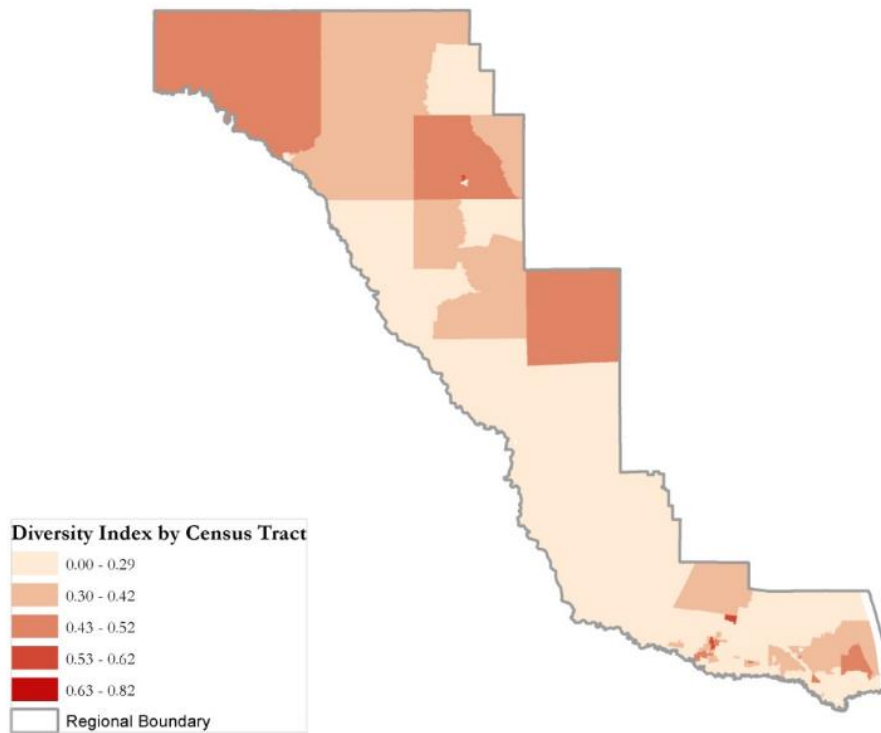


Figure 5-294 shows the Diversity Index by census tract for Region 11.

**Figure 5-294: Diversity Index, Region 11, 2018**



Region 11 is ethnically concentrated, as previously described. The region also experiences high rates of poverty, twice the state rate, which means large portions of the region are considered to be R/ECAPs. R/ECAPs are primarily located outside of city centers, with many R/ECAPs clustered around Laredo, the McAllen-Edinburg-Mission MSA and the Brownsville-Harlingen MSA. Detailed tables of the diversity index by census tract can be found in Appendix E.

### Household Characteristics

Figure 5-295 shows the household and family characteristics of Region 11 households.

**Figure 5-295: Household and Family Characteristics, Region 11, 2012 to 2016**

	Texas	Region 11
Total Households	9,289,554	499,924
Average Household Size	2.84	3.53
Percent of Households with a Minor	37.6%	49.2%
Total Family Households	6,405,049	400,202
Average Family Household Size	3.44	4.04
Average Non-Family Household Size	1.28	1.19

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 11 differs the most from the State of Texas when it comes to household and family characteristics. Region 11 has the largest average household and family household sizes among all regions, but the third smallest average non-family household size (behind Region 5 and Region 13). Region 11 also has the largest percentages of households and female-headed households with a minor among all regions. The percent of male-headed households with a minor in Region 11 is only slightly smaller than the statewide figure and is in the about average compared to other regions.

**Income**

Figure 5-296 displays household income by race and ethnicity for Region 11. Compared to the other regions, Region 11 has the lowest overall percent of households with incomes greater than 100% AMFI, less than 40% of all households in the region. Region 11 has a poverty rate twice that of the state rate, and is approaching 33% of the population in poverty. Region 11 has the highest percent of Hispanic households in the ELI category, and is the only region with more than 20% of Hispanic households with incomes less than or equal to 30% AMFI. At the same time, Region 11 has the highest percent of Black or African American households with incomes greater than 100% AMFI at 61.7%. Region 11 has the lowest rate of Black or African American households in the ELI category, at 8.1%.

**Figure 5-296: Household Income Category by Race and Ethnicity, Region 11, 2010 to 2014**

	Texas	Region 11	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	19.2%	8.6%	8.1%	3.9%	18.2%	22.2%	8.2%	21.0%
VLI	12.2%	15.6%	8.6%	14.8%	4.0%	10.9%	0.0%	8.6%	16.8%
LI	16.8%	17.6%	15.4%	14.4%	9.1%	13.1%	0.0%	10.8%	18.0%
MI	9.5%	8.6%	8.8%	1.0%	3.9%	5.5%	22.2%	11.6%	8.6%
Greater than 100 Percent AMFI	48.5%	39.0%	58.6%	61.7%	79.1%	52.3%	55.6%	60.8%	35.5%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

**Disability**

Of the civilian non-institutionalized population of Region 11, 13.7% has a disability, which is slightly higher than state’s rate of 11.6%. Figure 5-297 shows prevalence of disability by disability type in Region 11, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 5-297: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 11, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	1,768,543	1,499,966	268,577
Population With a Disability	3,083,141	241,428	195,434	45,994
Percent of Population with a Disability	11.6%	13.7%	13.0%	17.1%
Percent of Population with a Hearing Difficulty	3.4%	4.0%	3.8%	5.4%
Percent of Population with a Vision Difficulty	2.5%	4.1%	3.9%	4.7%
Percent of Population with a Cognitive Difficulty	4.3%	5.1%	4.9%	6.3%
Percent of Population with an Ambulatory Difficulty	6.1%	6.9%	6.5%	9.0%
Percent of Population with a Self-Care Difficulty	2.4%	3.8%	3.7%	4.7%
Percent of Population with an Independent Living Difficulty	3.9%	4.7%	4.4%	6.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-298 shows the percent of the civilian non-institutionalized population with a disability in Region 11 by gender and age. Higher rates of disability amongst children, males, and females compared to the state is consistent with the higher overall rate of disability in Region 11.

**Figure 5-298: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 11, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Percent of Population with a Disability	11.6%	13.7%	13.0%	17.1%
Percent of Males with a Disability	11.5%	13.8%	13.1%	17.2%
Percent of Female with a Disability	11.8%	13.5%	12.9%	17.1%
Percent of Minors With a Disability	4.2%	5.4%	5.4%	5.6%
Percent of Children Under Age 5 with a Disability	0.8%	1.1%	1.0%	1.4%
Percent of Children Aged 5-17 with a Disability	5.5%	7.2%	7.2%	7.3%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-299 shows the percent of the civilian non-institutionalized population with a disability in Region 11 by race and ethnicity. Higher rates of disability in Region 11 across almost all races and ethnicities is consistent with the higher overall rate of disability in Region 11 compared to the state and other regions. Region 11 has the third highest rate of disability among Hispanic or Latino individuals at 13.2% overall. Hispanic or Latino residents make up over 90% of the region's population. While Region 11 contains only 1.5% of the state's Native Hawaiian and Pacific Islander population, 0% of Native Hawaiian and Pacific Islander individuals in Region 11 have a disability. The next smallest rate of disability among Native Hawaiian and Pacific Islander individuals is in Region 12 at 1.6% followed by Region 7 at 4.2%.

**Figure 5-299: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 11, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	13.7%	13.0%	17.1%
White	11.9%	13.6%	12.9%	17.2%
Black or African American	13.4%	13.1%	13.0%	13.7%
American Indian or Alaskan Native	15.8%	19.3%	20.4%	15.4%
Asian	5.7%	5.3%	5.6%	0.6%
Hawaiian or Other Pacific Islander	8.5%	0.0%	0.0%	0.0%
Some Other Race	9.2%	15.6%	15.4%	17.1%
Two or More Races	11.1%	14.8%	14.7%	15.4%
Hispanic or Latino	9.5%	13.2%	12.5%	17.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

The poverty rate in Region 11 is almost double that of the state as a whole, and is the highest of all the regions. Region 13, the other region primarily along the Texas-Mexico border, has the second highest rate of poverty at 22.4%, almost 10% lower than Region 11. Figure 5-300 shows the prevalence of poverty in Region 11 by poverty level.

**Figure 5-300: Poverty Rates by Poverty Level, Region 11, 2012 to 2016**

	Texas	Region 11
Total Population for Whom Poverty Status is Determined	26,334,005	1,762,534
Below 100% Poverty (Overall Poverty Rate)	16.7%	32.0%
Below 50% of Poverty	7.0%	14.5%
Below 150% of Poverty	27.3%	47.4%
Below 200% of Poverty	37.2%	59.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-301 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 11 by age, gender, and race and ethnicity. Across demographic groups, poverty in Region 11 is significantly higher than each group's statewide average, in many cases doubling the rate. Almost 45% of all children under 18 are in poverty, and only 41% of the Region is above 200% of the poverty level. Compared to other regions, Region 11 has the highest poverty rate among children, males, females, White individuals, Hispanic or Latino individuals, and persons who identify as Two or More Races or Some Other Race. Hispanic or Latino individuals make up over 90% of the population of Region 11, and more than 1 in 3 Hispanic or Latino individuals live below the poverty line.



**Figure 5-301: Poverty Rates by Age, Gender and Race/Ethnicity, Region 11, 2012 to 2016**

	<b>Texas</b>	<b>Region 11</b>
Total Population for Whom Poverty Status is Determined	26,334,005	1,762,534
Below 100% Poverty (Overall Poverty Rate)	16.7%	32.0%
Metro County	16.4%	32.7%
Non-Metro County	18.7%	27.9%
Under 18	23.9%	43.9%
Male	15.2%	29.9%
Female	18.2%	33.9%
White	15.5%	32.1%
Black or African American	22.6%	19.2%
American Indian and Alaskan Native	21.2%	27.7%
Asian	11.1%	6.6%
Hawaiian and Other Pacific Islander	14.0%	17.9%
Some Other Race	24.4%	34.8%
Two or More Races	17.2%	29.8%
Hispanic or Latino	24.2%	33.9%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-302 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Brownsville-Harlingen, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 5-302: Share of Job Counts by Distance between Work Census Block and Home Census Block, Brownsville-Harlingen CBSA, TX, Region 11, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	130,285	100.0%
Less than 10 miles	79,049	60.7%
10 to 24 miles	25,617	19.7%
25 to 50 miles	11,515	8.8%
Greater than 50 miles	14,104	10.8%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-303 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Laredo, TX CBSA.

**Figure 5-303: Share of Job Counts by Distance between Work Census Block and Home Census Block, Laredo CBSA, TX, Region 11, 2015**

	Count	Share
Total All Jobs	92,434	100.0%
Less than 10 miles	70,546	76.3%
10 to 24 miles	5,618	6.1%
25 to 50 miles	1,653	1.8%
Greater than 50 miles	14,617	15.8%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-304 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the McAllen-Edinburg-Mission, TX CBSA. Region 11 has the highest percentages of job holders living within 10 miles of their jobs, which indicates that people live closer to their jobs and may indicate that jobs are well dispersed across the region. Over half of the jobs located in Region 11 CBSAs are located in the McAllen-Edinburg-Mission CBSA.

**Figure 5-304: Share of Job Counts by Distance between Work Census Block and Home Census Block, McAllen-Edinburg-Mission CBSA, TX, Region 11, 2015**

	Count	Share
Total All Jobs	247,365	100.0%
Less than 10 miles	155,473	62.9%
10 to 24 miles	52,161	21.1%
25 to 50 miles	17,176	6.9%
Greater than 50 miles	22,555	9.1%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-305 shows the employment and living situation of individuals in each county of Region 11. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. In Region 11, people tend to live where they work, with large percentages of the population within CBSAs living within 10 miles of their job. A majority of the jobs in the Region are in Hidalgo County (McAllen, Edinburg and Mission, TX), followed by Cameron County (Brownsville and Harlingen, TX) and Webb County (Laredo, TX) respectively.

**Figure 5-305: Employment and Living Situations, Counties in Region 11, 2015**

<b>County</b>	<b>Lived Outside of County, Worked in County</b>	<b>Lived and Worked in County</b>	<b>Lived in County, Worked Outside of County</b>	<b>Percent that Lived in County and Worked Outside pf County</b>
Cameron	28,574	101,711	39,077	27.8%
Dimmit	4,407	1,693	1,645	49.3%
Edwards	158	124	353	74.0%
Hidalgo	43,506	203,859	53,498	20.8%
Jim Hogg	373	410	1,622	79.8%
Kinney	212	169	476	73.8%
La Salle	2,642	885	1,052	54.3%
Maverick	3,792	12,986	9,134	41.3%
Real	249	398	625	61.1%
Starr	3,808	9,273	12,192	56.8%
Uvalde	3,743	5,033	5,475	52.1%
Val Verde	4,145	9,373	8,004	46.1%
Webb	15,601	76,833	18,907	19.7%
Willacy	1,465	1,397	5,311	79.2%
Zapata	1,531	1,099	2,410	68.7%
Zavala	1,388	1,341	2,913	68.5%
<b>Total</b>	<b>115,594</b>	<b>426,584</b>	<b>162,694</b>	<b>27.6%</b>

Source: On the map data, 2015, with out of state employment data excluded.

Figure 5-306 shows the mean travel time to work for counties in Region 11.

**Figure 5-306: Mean Travel Time to Work, Counties in Region 11, 2012 to 2016**

<b>County</b>	<b>Mean travel time to work (minutes)</b>
Cameron	20.1
Dimmit	16.3
Edwards	18
Hidalgo	21.9
Jim Hogg	33.9
Kinney	17.5
La Salle	19.8
Maverick	21.2
Real	16.1
Starr	22.6
Uvalde	17.2
Val Verde	19.7
Webb	21.7
Willacy	23.1
Zapata	18.4
Zavala	15.3

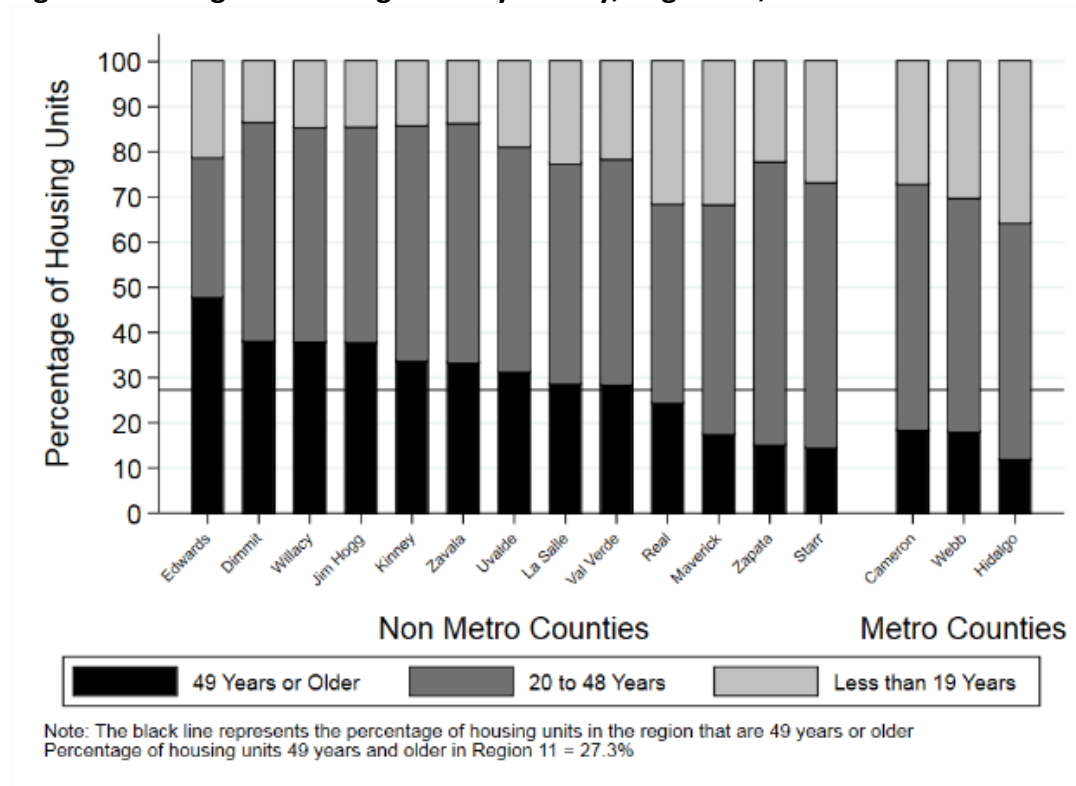
Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

Mean travel times vary greatly from 15.3 minutes to 33.9 minutes, with most around 20 minutes. The range of commute times might be accounted for by individuals commuting to the job centers in Region 11 CBSAs. More than half of the counties in Region 11 have more people that are employed outside of their county of residence than people who work in the county they live.

### **Housing Profile**

Figure 5-307 shows the age of housing stock by county in Region 11 as a percentage of the total housing stock.

**Figure 5-307: Age of Housing Stock by County, Region 11, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Figure 5-308 shows the data visually represented in Figure 5-307 in table form.

**Figure 5-308: Age of Housing Stock by County, Region 11, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Cameron	18.4%	54.5%	27.1%
Dimmit	38.1%	48.4%	13.4%
Edwards	47.8%	31.0%	21.2%
Hidalgo	11.9%	52.3%	35.7%
Jim Hogg	37.8%	47.8%	14.4%
Kinney	33.7%	52.2%	14.1%
La Salle	28.6%	48.8%	22.5%
Maverick	17.5%	50.9%	31.6%
Real	24.4%	44.1%	31.5%
Starr	14.5%	58.8%	26.7%
Uvalde	31.3%	49.9%	18.8%
Val Verde	28.4%	50.0%	21.6%
Webb	18.1%	51.8%	30.2%
Willacy	38.0%	47.6%	14.5%
Zapata	15.2%	62.7%	22.1%
Zavala	33.3%	53.1%	13.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

## Regional Analysis

Figure 5-309 shows households in Region 11 experiencing one or more housing problems.

**Figure 5-309: Percent of Households with One or More Housing Problems, Region 11, 2010 to 2014**

<b>Households with One or More Housing Problems</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 11 Total</b>	<b>State Total</b>
ELI Renter Households	77.8%	69.0%	76.5%	79.4%
VLI Renter Households	80.2%	60.7%	77.7%	82.7%
LI Renter Households	57.8%	41.4%	55.7%	52.1%
MI Renter Households	33.8%	25.1%	32.5%	24.2%
Renter Households with Incomes Greater than 100% AMFI	13.0%	11.5%	12.8%	8.5%
Percent Total Renter Households	56.9%	46.2%	55.4%	48.2%
ELI Owner Households	74.7%	66.5%	73.1%	73.6%
VLI Owner Households	55.9%	39.2%	52.6%	57.2%
LI Owner Households	42.9%	31.1%	40.7%	42.8%
MI Owner Households	31.3%	19.7%	29.1%	29.0%
Owner Households with Incomes Greater than 100% AMFI	14.2%	9.0%	13.4%	9.1%
Percent Total Owner Households	33.8%	27.2%	32.6%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

Looking at all income categories and household types, Region 11 has the highest rates of households experiencing at least one housing problem among all regions. Region 11 has particularly high rates of higher income households experiencing housing problems in both Metro and Non-Metro counties compared to the rest of the state. Of owner households with incomes greater than 100% AMFI, 13.4% have at least one housing problem, which is the highest rate among all regions for that household type. Figure 5-310 shows renter and owner households in Region 11 that lack complete plumbing or kitchen facilities.

**Figure 5-310: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 11, 2010 to 2014**

Households Lacking Complete Plumbing or Kitchen Facilities	Metro	Non-Metro	Region 11 Total	State Total
ELI Renter Households	5.9%	5.0%	5.8%	2.7%
VLI Renter Households	4.1%	2.9%	3.9%	2.3%
LI Renter Households	3.0%	1.0%	2.7%	1.8%
MI Renter Households	2.5%	0.7%	2.3%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.5%	1.7%	1.5%	1.2%
Percent Total Renter Households	3.8%	2.9%	3.6%	1.9%
ELI Owner Households	6.1%	5.8%	6.0%	2.6%
VLI Owner Households	3.1%	4.4%	3.4%	1.6%
LI Owner Households	1.9%	0.8%	1.7%	0.8%
MI Owner Households	1.1%	0.8%	1.0%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.6%	0.4%	0.6%	0.4%
Percent Total Owner Households	1.9%	1.9%	1.9%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Region 11 has the highest rates of housing lacking complete plumbing or kitchen facilities. Rates are particularly high for lower income and owner households. ELI owner households in Region 11 are more likely to lack complete facilities than ELI renter households. Region 11 is home to the majority of Texas’ “colonias,” which Texas Government Code 2306.581 defines as:

*“(1) "Colonia" means a geographic area that is located in a county some part of which is within 150 miles of the international border of this state, that consists of 11 or more dwellings that are located in close proximity to each other in an area that may be described as a community or neighborhood, and that:*

*(A) has a majority population composed of individuals and families of low income and very low income, based on the federal Office of Management and Budget poverty index, and meets the qualifications of an economically distressed area under Section 17.921, Water Code; or*

*(B) has the physical and economic characteristics of a colonia, as determined by the department.”*

Figure 5-311 shows renter and owner households in Region 11 that are cost burdened. Region 11 has relatively low cost burden compared to other regions in individual income categories, but the percentages of total owner and renter households experiencing cost burden are very high. Around seven in 10 ELI renter households in Region 11 are cost burdened, which is low compared to other regions, but almost half of total renters are cost burdened, which is high compared to other regions. This is likely due to the fact that more households in Region 11 are in the ELI income category, and that category has the highest rates of cost burden. For example, 21.1% of renter households and 12.2% of total households in Region 10 are ELI, however, in Region 11

## Regional Analysis

33.0% of renter and 19.2% of total households are ELI. Having more households in the ELI category, which are more likely to experience cost burden, raises the overall percentage of households experiencing cost burden.

**Figure 5-311: Percent of Households Experiencing Cost Burden, Region 11, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 11 Total</b>	<b>State Total</b>
ELI Renter Households	71.8%	62.7%	70.5%	77.3%
VLI Renter Households	70.9%	52.4%	68.6%	78.1%
LI Renter Households	42.4%	27.8%	40.5%	44.5%
MI Renter Households	15.6%	13.0%	15.2%	17.0%
Renter Households with Incomes Greater than 100% AMFI	3.2%	3.4%	3.2%	4.0%
Percent Total Renter Households	46.9%	37.5%	45.6%	43.3%
ELI Owner Households	67.9%	59.2%	66.2%	70.9%
VLI Owner Households	46.4%	30.5%	43.2%	52.8%
LI Owner Households	31.6%	21.2%	29.7%	37.5%
MI Owner Households	19.1%	11.6%	17.7%	24.3%
Owner Households with Incomes Greater than 100% AMFI	6.5%	3.4%	6.0%	6.9%
Percent Total Owner Households	24.9%	19.8%	24.0%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Figure 5-312 shows renter and owner households in Region 11 that are overcrowded.

**Figure 5-312: Percent of Households Experiencing Overcrowding, Region 11, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 11 Total</b>	<b>State Total</b>
ELI Renter Households	21.7%	17.6%	21.1%	10.0%
VLI Renter Households	21.9%	13.7%	20.9%	10.7%
LI Renter Households	17.8%	14.7%	17.4%	7.9%
MI Renter Households	16.6%	12.0%	15.9%	6.2%
Renter Households with Incomes Greater than 100% AMFI	8.4%	6.5%	8.1%	3.6%
Percent Total Renter Households	17.7%	13.4%	17.1%	7.5%
ELI Owner Households	15.0%	9.1%	13.9%	5.5%
VLI Owner Households	11.0%	7.8%	10.4%	6.1%
LI Owner Households	12.2%	10.3%	11.9%	5.8%
MI Owner Households	12.2%	7.2%	11.3%	4.5%
Owner Households with Incomes Greater than 100% AMFI	7.2%	5.2%	6.9%	1.8%
Percent Total Owner Households Overcrowded	10.0%	7.3%	9.6%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Region 11 has the highest rates of overcrowding in the State of Texas. Rates of overcrowding in Region 11 are so significant that they skew the overcrowding rates for the state as a whole, putting only a couple of regions above the statewide figures. For all household income groupings, households in Region 11 Metro counties experience overcrowding at a greater rate than those in



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Non-Metro counties. Rates are particularly high for renter households in Metro counties, where more than one in five ELI and VLI renter households experience overcrowding, over twice the rate for other regions. The rate of LI and MI renter households in Metro counties experiencing overcrowding are similarly greater than twice the next highest rate. Region 11 has the highest rate of overcrowding for renter households at 17.1%, followed by Region 13 with 8.7%, and the highest rate of overcrowding for owner households at 9.6%, followed by Region 13 with 5.1%. Figure 5-313 shows the average housing costs in Region 11.

**Figure 5-313: Average Housing Costs, Region 11, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$541
Average Monthly Rent	\$546

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Average housing costs in Region 11 are consistent with regions with larger Non-Metro populations as opposed to those with a large Metro populations. Figure 5-314 shows the number of bedrooms in renter and owner occupied housing units in Region 11.

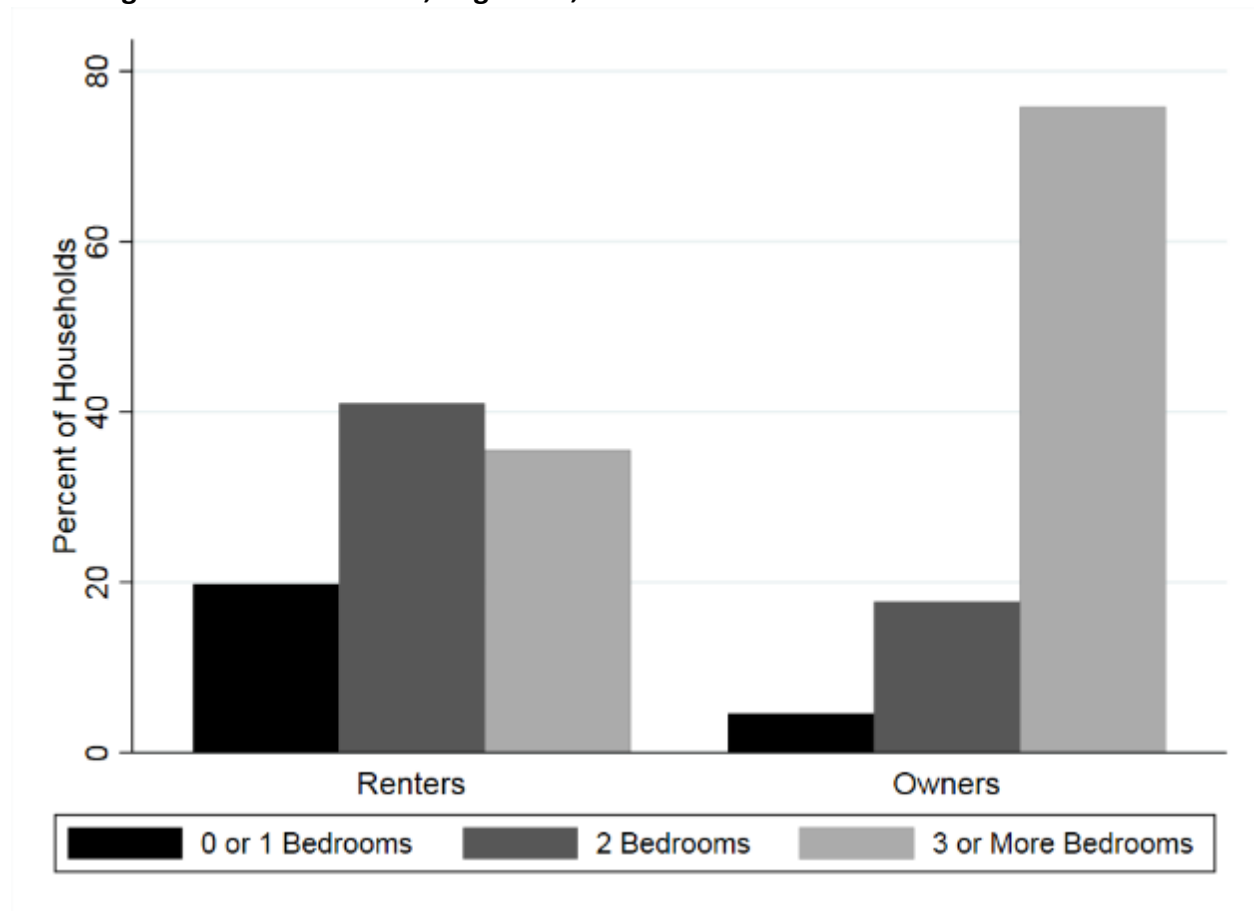
**Figure 5-314: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 11, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	152,063	20.5%	42.6%	36.9%
Owner Occupied	324,921	4.7%	18.0%	77.3%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-315 is a visual representation of the regional data from Figure 5-314.

**Figure 5-315: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 11, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Region 11’s tenure and unit size profile differs considerably from that of the state as a whole. Region 11 has the highest percentage of renter occupied units and the second highest percentage of total occupied units with 2 bedrooms. Region 11 also has the highest percentage of owner occupied units with 0 or 1 units, but the third lowest percentage of renter occupied units with 0 or 1 bedrooms. Just 6.5% of total Region 11 occupied units consist of renter occupied units with 0 or 1 bedrooms. The high percentage of owner occupied units with 0 or 1 bedrooms combined with the fact that Region 11 also has the second lowest percentage of owner occupied units with 3 or more bedrooms supports the finding that there is a greater issue with overcrowding in owner occupied units compared to other regions.

Overcrowding and housing cost burden are major housing problems in Region 11. Despite the large family size in the region, there is not a high supply of units with three or more bedrooms, especially for renters. Anecdotal evidence given by advocates and housing providers from the Brownsville area indicates that there is a large unmet need of units with more than four bedrooms. Lack of large units means overcrowding rates that are higher than anywhere else in the state. Figure 5-316 maps the active multifamily properties in Region 11 participating in TDHCA programs.

**Figure 5-316: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 11, 2018**

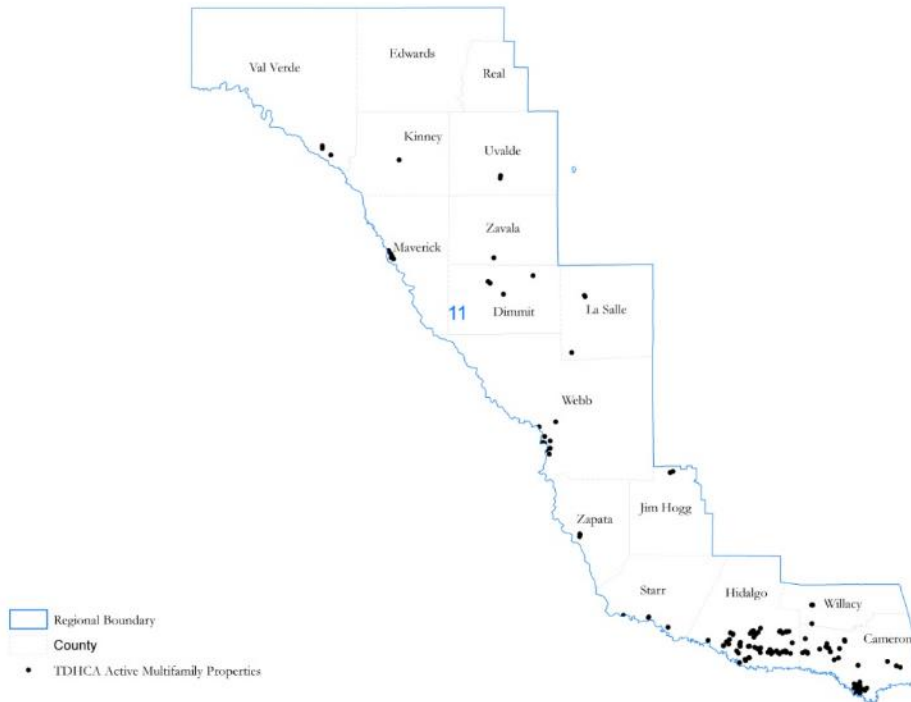


Figure 5-317 shows the number of multifamily properties participating in TDHCA programs by county in Region 11. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-317: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 11, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Cameron	45	4,646	4,270
Dimmit	4	130	130
Hidalgo	77	6,964	6,139
Jim Hogg	2	24	24
Kinney	1	32	32
La Salle	3	116	116
Maverick	5	320	244
Starr	7	300	290
Uvalde	3	220	220
Val Verde	5	451	450
Webb	10	1,249	1,150
Willacy	4	206	196
Zapata	3	73	68
Zavala	1	60	60
<b>Total</b>	<b>170</b>	<b>14,791</b>	<b>13,389</b>

Source: TDHCA, Central Database, data pull from June 2018.

Active multifamily properties participating in TDHCA programs are located across the region with a concentration in the two southernmost counties in the state, Cameron and Hidalgo counties. These counties are home to the Brownsville-Harlingen MSA and McAllen-Edinburg-Mission MSA respectively.

## Region 12—“West Texas”

Point of Reference Cities: Midland, Odessa, San Angelo

### Geo-Demographic Background

An influx of Europeans first settled in Midland along the railroad because it was the midpoint between Fort Worth to the east and El Paso to the west. It became an important center for cattle and cotton trade. In the early 20th century, oil was discovered in the Permian Basin. The petroleum industry is still the dominant industry in West Texas. Low income minority populations appear clustered in neighborhoods within the urban centers of Midland, Odessa, and San Angelo. Figure 5-318 shows the counties of TDHCA Region 12.

Figure 5-318: State of Texas’ Region 12 Counties

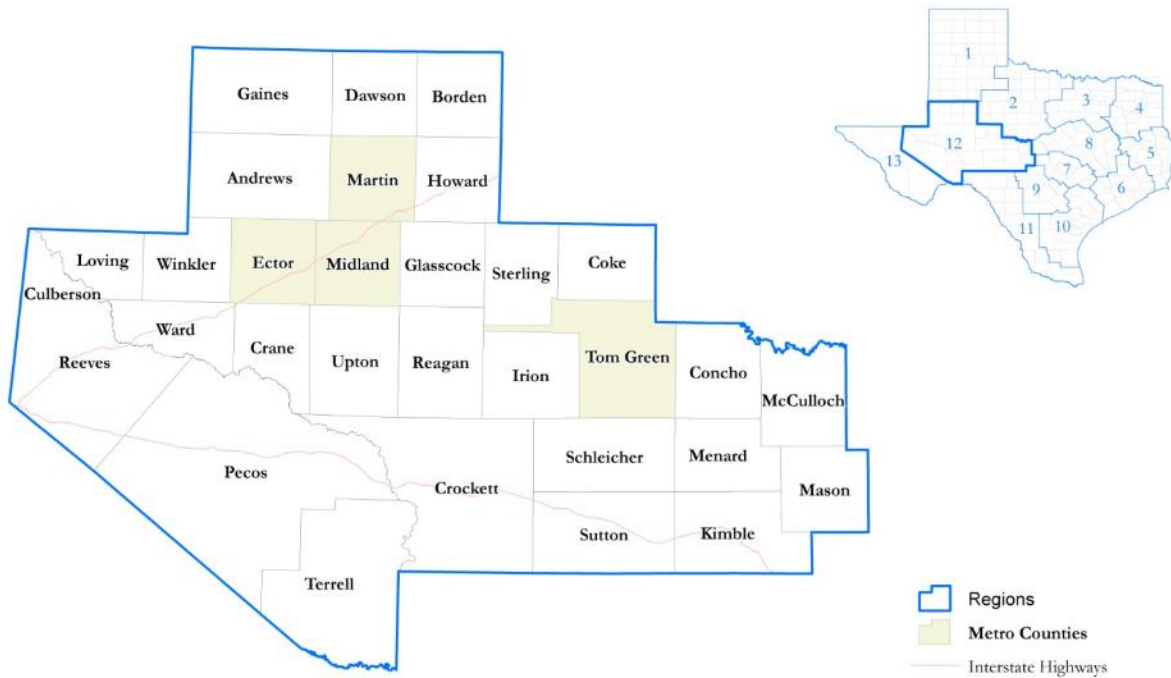


Figure 5-319 displays the population composition of Region 12 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

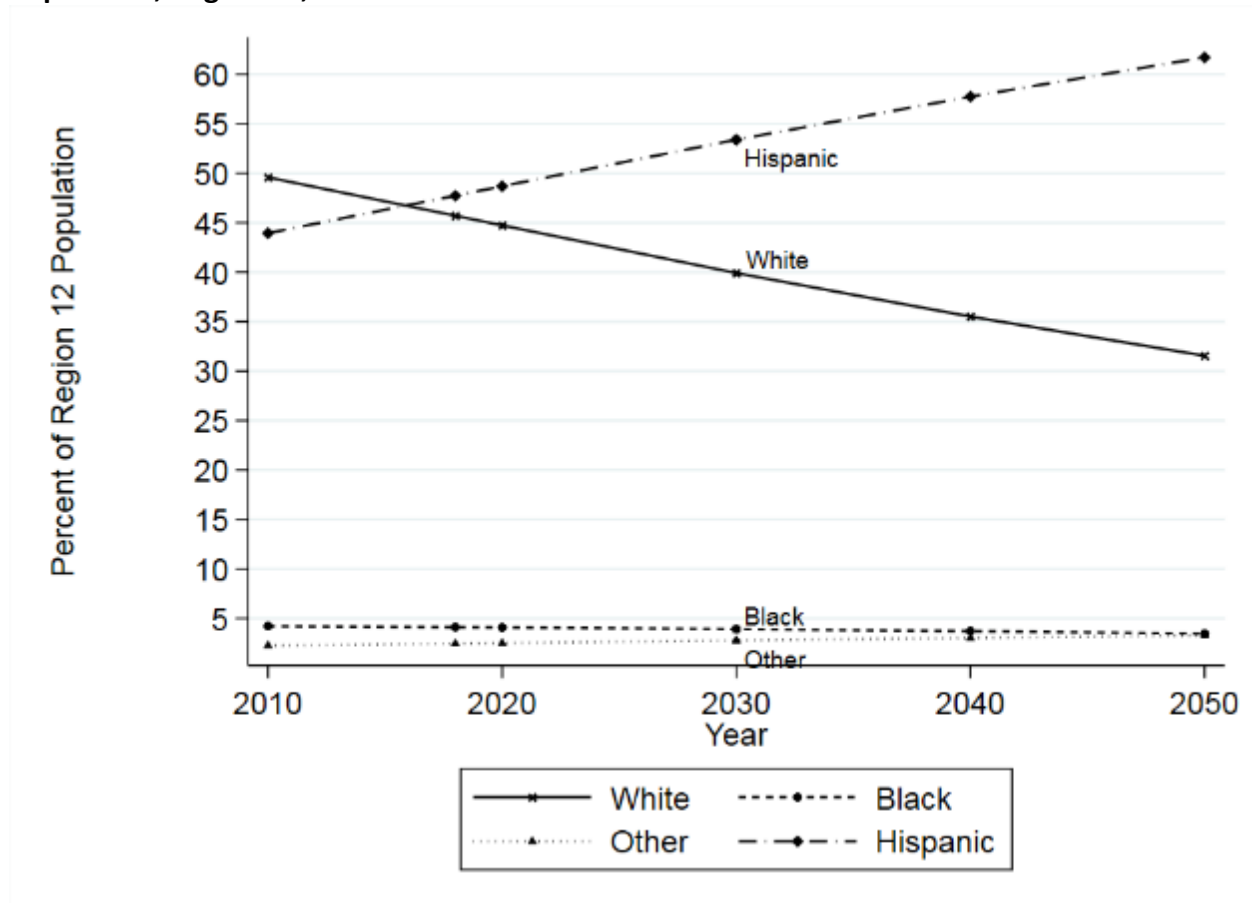
**Figure 5-319: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 12, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	49.6%	4.2%	2.2%	43.9%	571,871
2018	45.7%	4.1%	2.4%	47.7%	619,628
2020	44.7%	4.1%	2.5%	48.7%	631,614
2030	39.9%	3.9%	2.8%	53.4%	692,113
2040	35.5%	3.7%	3.0%	57.8%	748,381
2050	31.5%	3.5%	3.3%	61.7%	802,891

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 12 is a sparsely populated area of the state and the second least populous region behind Region 2. It is currently fairly evenly split between White and Hispanic individuals, however, like most of the state, the region is projected to see an increase in the percentage of the Hispanic population versus the White population over the next 30 years. Figure 5-320 is a visual representation of Figure 5-319.

**Figure 5-320: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 12, 2010 to 2050**



### Race and Ethnicity

Figure 5-321 shows the R/ECAPs in Region 12. Figure 5-322 shows the R/ECAPs in Big Spring. A list of the census tracts designated as R/ECAPS is available in Appendix D as well.

**Figure 5-321: Map of R/ECAPS, Region 12, 2018**

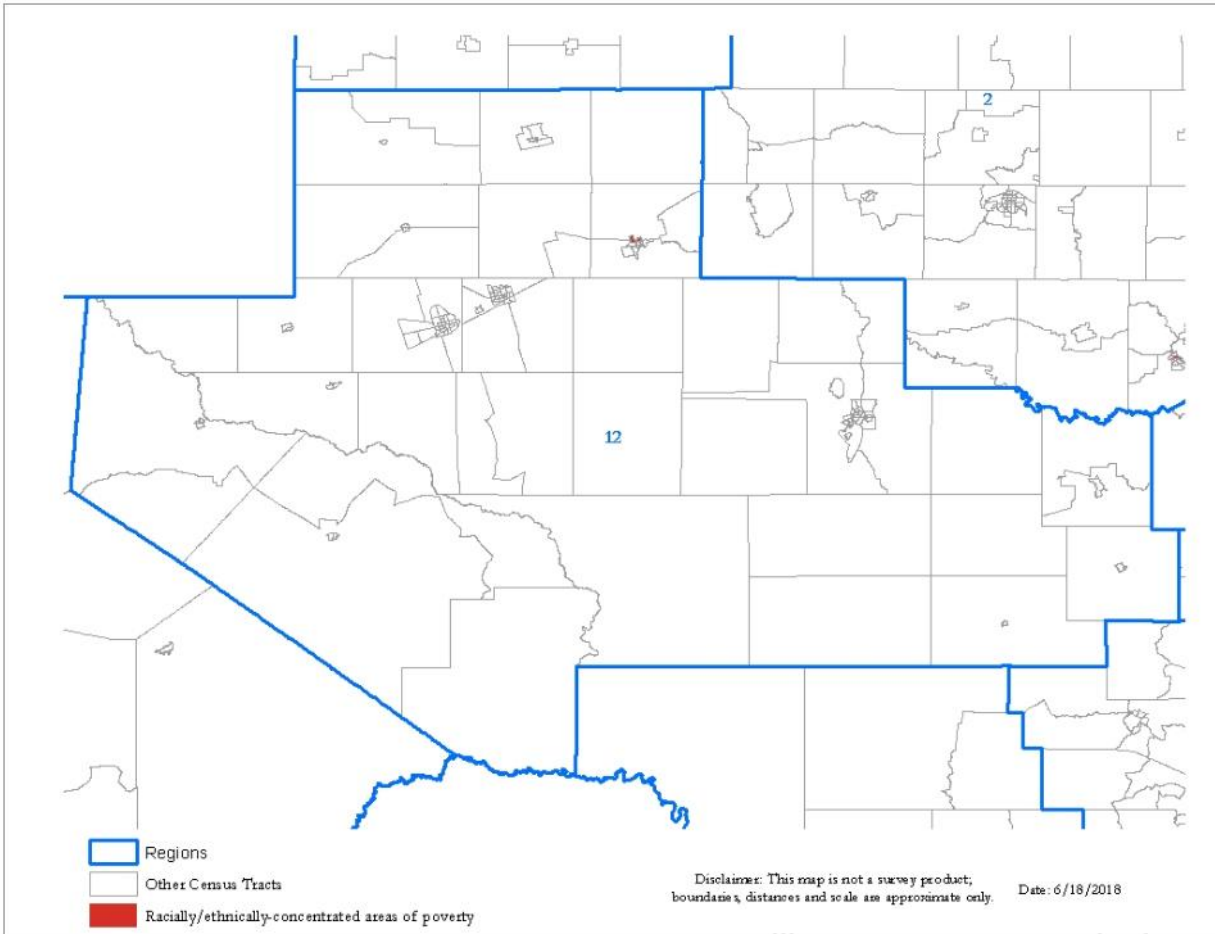


Figure 5-322: Map of R/ECAPS, Big Spring, TX, Region 12, 2018

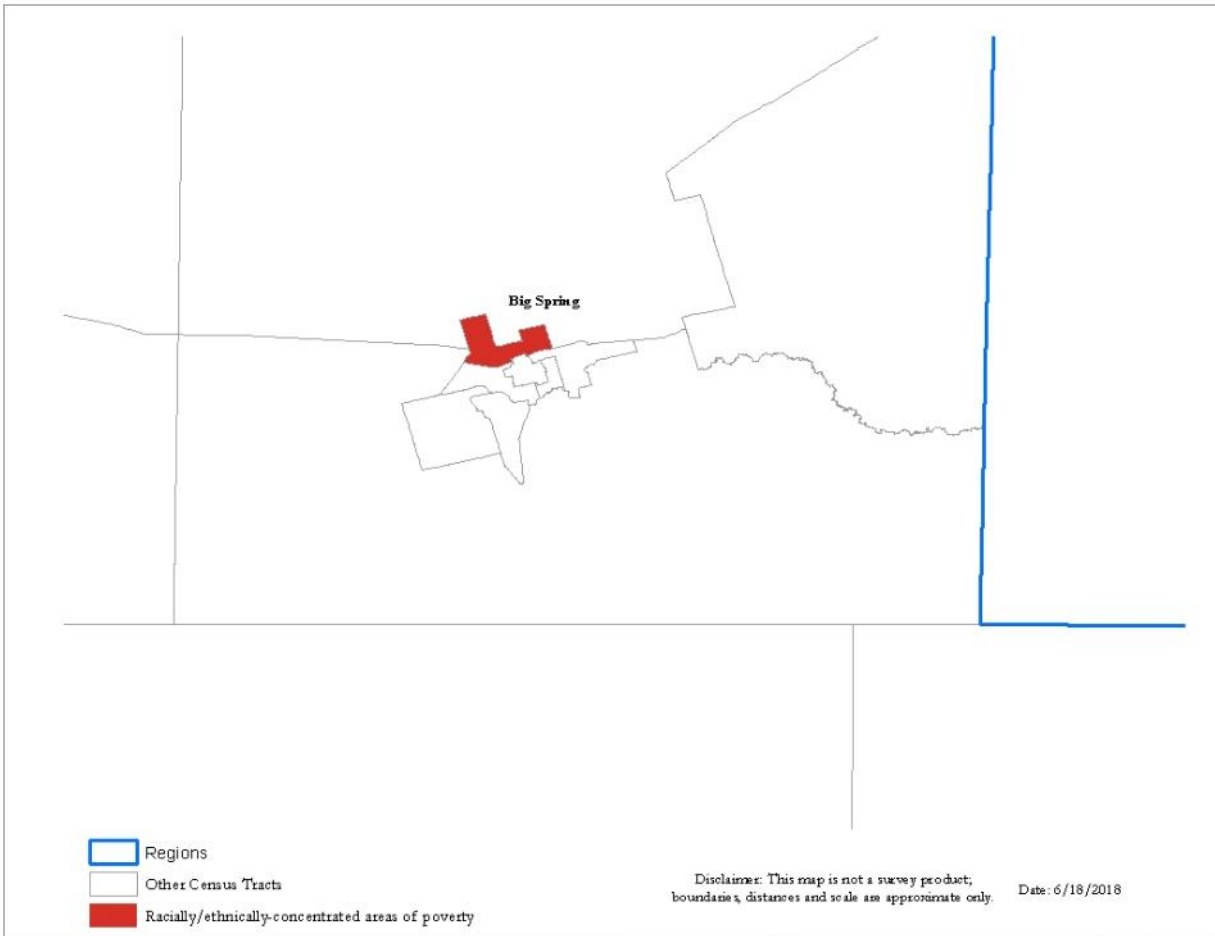
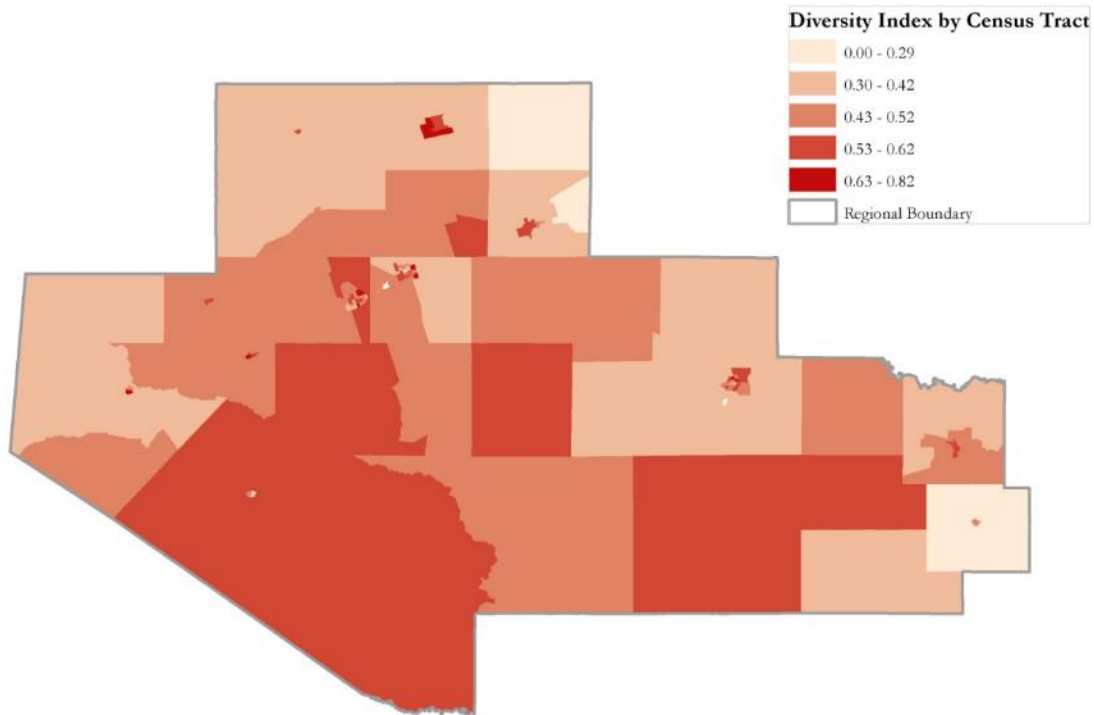




Figure 5-323 shows the Diversity Index by census tract for Region 12.

**Figure 5-323: Diversity Index, Region 12, 2018**



The highest diversity in the Region appears in Terrell County, the southernmost county on the US-Mexico border. There is only one R/ECAP in Region 12. This is likely due to the area being rich in oil, which creates job opportunities and lowers poverty rates. Detailed tables of the diversity index by census tract can be found in Appendix E

### Household Characteristics

Figure 5-324 shows the household and family characteristics of Region 12 households.

Out of all the regions, Region 12 most closely resembles state figures for household and family characteristics. The Region 12 percent of male-headed households with a minor is the median value of all regional figures.

**Figure 5-324: Household and Family Characteristics, Region 12, 2012 to 2016**

	Texas	Region 12
Total Households	9,289,554	211,484
Average Household Size	2.84	2.82
Percent of Households with a Minor	37.6%	35.9%
Total Family Households	6,405,049	144,715
Average Family Household Size	3.44	3.45
Average Non-Family Household Size	1.28	1.26

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

## Income

Figure 5-325 displays the percentage of the regional population by household income category and race and ethnicity for Region 12. Region 12 has the highest overall percent of households with incomes greater than 100% AMFI, with more than 50% of households in the region in this income category. Of all of the regions, Region 12 has both the lowest rate of Hispanic households that are ELI, at 12.7%, and the highest rate of Hispanic households with incomes greater than 100% AMFI, at 42.9%. Despite only 32.9% of Black or African American households having incomes greater than 100% AMFI, data indicates that Region 12 has greater income equality across races and ethnicities than other regions.

**Figure 5-325: Household Income Category by Race and Ethnicity, Region 12, 2010 to 2014**

	Texas	Region 12	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	10.4%	8.2%	18.0%	11.4%	8.0%	6.3%	12.5%	12.7%
VLI	12.2%	11.6%	9.9%	18.1%	9.4%	4.7%	0.0%	9.7%	13.7%
LI	16.8%	16.7%	14.4%	21.9%	13.7%	19.3%	31.3%	17.9%	19.6%
MI	9.5%	9.8%	9.0%	9.1%	11.1%	10.9%	0.0%	7.3%	11.1%
Greater than 100 Percent AMFI	48.5%	51.5%	58.5%	32.9%	54.4%	57.1%	62.5%	52.6%	42.9%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

## Disability

Region 12 has one of the lower rates of disability among civilian non-institutionalized population in the state. Though the Non-Metro population is relatively small, Region 12 has the second lowest rate of disability among the Non-Metro population at 13.6%, after Region 6 at 12.8%. Figure 5-326 shows prevalence of disability by disability type in Region 12, including hearing

difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 5-326: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 12, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	599,404	424,750	174,654
Population With a Disability	3,083,141	75,646	51,915	23,731
Percent of Population with a Disability	11.6%	12.6%	12.2%	13.6%
Percent of Population with a Hearing Difficulty	3.4%	4.1%	3.9%	4.5%
Percent of Population with a Vision Difficulty	2.5%	2.8%	2.7%	3.1%
Percent of Population with a Cognitive Difficulty	4.3%	4.3%	4.2%	4.5%
Percent of Population with an Ambulatory Difficulty	6.1%	6.4%	6.1%	7.2%
Percent of Population with a Self-Care Difficulty	2.4%	2.2%	2.1%	2.6%
Percent of Population with an Independent Living Difficulty	3.9%	4.0%	3.6%	4.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-327 shows the percent of the civilian non-institutionalized population with a disability in Region 12 by gender and age. Despite having a relatively low rate of disability compared to other regions, Region 12 has the highest rate of disability among children under the age of 5 at 1.5%.

**Figure 5-327: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 12, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Percent of Population with a Disability	11.6%	12.6%	12.2%	13.6%
Percent of Males with a Disability	11.5%	12.4%	11.9%	13.5%
Percent of Female with a Disability	11.8%	12.9%	12.6%	13.6%
Percent of Minors With a Disability	4.2%	4.3%	4.5%	3.8%
Percent of Children Under Age 5 with a Disability	0.8%	1.5%	1.8%	0.5%
Percent of Children Aged 5-17 with a Disability	5.5%	5.5%	5.7%	5.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-328 shows the percent of the civilian non-institutionalized population with a disability in Region 12 by race and ethnicity. Slightly higher rates of disability among White individuals, Black or African American individuals, individuals who identify as Some Other Race, individuals who identify as Two or More Races, and Hispanic individuals is consistent with the higher overall rate of disability in Region 12 compared to the state and other regions.

**Figure 5-328: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 12, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	12.6%	12.2%	13.6%
White	11.9%	12.8%	12.4%	13.7%
Black or African American	13.4%	15.3%	15.3%	15.5%
American Indian or Alaskan Native	15.8%	12.8%	12.6%	13.0%
Asian	5.7%	4.8%	4.0%	9.8%
Hawaiian or Other Pacific Islander	8.5%	1.6%	0.0%	2.4%
Some Other Race	9.2%	10.2%	9.7%	10.7%
Two or More Races	11.1%	15.0%	12.3%	23.6%
Hispanic or Latino	9.5%	9.9%	9.6%	10.8%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

Region 12 has significantly lower rates of poverty than the state as a whole and is the lowest of all the regions. Figure 5-329 shows the prevalence of poverty in Region 12 by poverty level.

**Figure 5-329: Poverty Rates by Poverty Level, Region 12, 2012 to 2016**

	Texas	Region 12
Total Population for Whom Poverty Status is Determined	26,334,005	596,123
Below 100% Poverty (Overall Poverty Rate)	16.7%	12.0%
Below 50% of Poverty	7.0%	4.9%
Below 150% of Poverty	27.3%	21.5%
Below 200% of Poverty	37.2%	31.9%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

Figure 5-330 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 12 by age, gender, and race and ethnicity. Across most demographic groups, poverty in Region 12 is lower than each group's statewide average. Compared to other regions, Region 12 has the lowest poverty rate for children, males, females, White individuals, Hispanic or Latino individuals, Asian individuals, Hawaiian and Other Pacific Islander individuals, and persons who identify as Some Other Race. Black or African American individuals and persons identifying as Two or More Races have the second lowest poverty rate in their respective groups compared to other regions. American Indian and Alaskan Native individuals, unlike other demographic groups in Region 12, have a higher poverty rate than the state at 28.8%.

**Figure 5-330: Poverty Rates by Age, Gender and Race and Ethnicity, Region 12, 2012 to 2016**

	Texas	Region 12
Total Population for Whom Poverty Status is Determined	26,334,005	596,123
Below 100% Poverty (Overall Poverty Rate)	16.7%	12.0%
Metro County	16.4%	11.1%
Non-Metro County	18.7%	14.2%
Under 18	23.9%	15.6%
Male	15.2%	10.1%
Female	18.2%	13.9%
White	15.5%	11.0%
Black or African American	22.6%	18.3%
American Indian and Alaskan Native	21.2%	28.8%
Asian	11.1%	6.8%
Hawaiian and Other Pacific Islander	14.0%	3.5%
Some Other Race	24.4%	18.4%
Two or More Races	17.2%	14.7%
Hispanic or Latino	24.2%	15.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

## Employment

Figure 5-331 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Midland, TX CBSA. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 5-331: Share of Job Counts by Distance between Work Census Block and Home Census Block, Midland CBSA, TX, Region 12, 2015**

	Count	Share
Total All Jobs	94,370	100.0%
Less than 10 miles	48,486	51.4%
10 to 24 miles	16,984	18.0%
25 to 50 miles	5,279	5.6%
Greater than 50 miles	23,621	25.0%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-332 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the Odessa, TX CBSA.

**Figure 5-332: Share of Job Counts by Distance between Work Census Block and Home Census Block, Odessa CBSA, TX, Region 12, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	72,489	100.0%
Less than 10 miles	40,497	55.9%
10 to 24 miles	11,796	16.3%
25 to 50 miles	3,414	4.7%
Greater than 50 miles	16,782	23.2%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-333 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the San Angelo, TX CBSA. Region 12 has one of the higher percentages of job holders living within 10 miles of their jobs, with over 50% of job holders in all three CBSAs living within 10 miles of work. This indicates that people live closer to their jobs and might indicate that jobs are well dispersed across the region. Despite having a majority of job holders living within 10 miles of where they work, close to a quarter of job holders in the three CBSAs drive more than 50 miles to work at a job in one of the CBSAs, which may be due to movement between the CBSAs.

**Figure 5-333: Share of Job Counts by Distance between Work Census Block and Home Census Block, San Angelo CBSA, TX, Region 12, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	47,090	100.0%
Less than 10 miles	30,440	64.6%
10 to 24 miles	3,771	8.0%
25 to 50 miles	1,526	3.2%
Greater than 50 miles	11,353	24.1%

Source: Job center information, On the Map data tool 2015, Census.gov.

Figure 5-334 shows the employment and living situation of individuals in each county of Region 12. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. In Ector County (Odessa, TX), Midland County (Midland, TX), and Tom Green County (San Angelo, TX), there is an influx of individuals coming in for work from outside of the county.

**Figure 5-334: Employment and Living Situations, Counties in Region 12, 2015**

<b>County</b>	<b>Lived Outside of County, Worked in County</b>	<b>Lived and Worked in County</b>	<b>Lived in County, Worked Outside of County</b>	<b>Percent that Lived in County and Worked Outside of County</b>
Andrews	3,347	3,922	3,919	50.0%
Borden	92	81	209	72.1%
Coke	260	235	709	75.1%
Concho	497	232	600	72.1%
Crane	670	540	1,715	76.1%
Crockett	739	412	624	60.2%
Dawson	1,755	2,449	2,586	51.4%
Ector	29,791	42,698	27,028	38.8%
Gaines	2,726	3,015	2,685	47.1%
Glasscock	316	169	345	67.1%
Howard	4,529	7,964	7,297	47.8%
Irion	693	136	414	75.3%
Kimble	390	828	787	48.7%
Loving	21	*	136	*
McCulloch	1,606	1,671	1,547	48.1%
Martin	905	390	1,375	77.9%
Mason	616	569	611	51.8%
Menard	241	199	439	68.8%
Midland	42,138	50,937	22,406	30.5%
Pecos	1,853	2,695	3,468	56.3%
Reagan	1,021	572	1,161	67.0%
Reeves	1,516	1,895	3,340	63.8%
Schleicher	417	482	641	57.1%
Sterling	335	173	303	63.7%
Sutton	1,140	666	909	57.7%
Terrell	69	28	175	86.2%
Tom Green	12,528	33,733	12,573	27.2%
Upton	1,005	295	788	72.8%
Ward	2,391	2,469	2,611	51.4%
Winkler	1,107	1,140	2,108	64.9%
<b>Total</b>	<b>114,714</b>	<b>97,914</b>	<b>103,509</b>	<b>51.4%</b>

Source: On the map data, 2015, with out of state employment data excluded.

\* Data unavailable for Loving County due privacy and anonymity concerns brought about by the county's small population.

## Regional Analysis

Figure 5-335 shows the mean travel time to work for counties in Region 12. Almost half of the counties in Region 12 have mean commute times of less than 20 minutes, meaning that for many counties in the region, people live relatively close to where they work. The counties with average commute times over 25 minutes are all counties with small populations, and a majority of people living in those respective counties travel outside of the county for work.

**Figure 5-335: Mean Travel Time to Work, Counties in Region 12, 2012 to 2016**

<b>County</b>	<b>Mean travel time to work (minutes)</b>
Andrews	18.5
Borden	28.7
Coke	20.4
Concho	22.4
Crane	26.6
Crockett	21.2
Dawson	16.9
Ector	21.6
Gaines	18.7
Glasscock	20.3
Howard	18.3
Irion	23.6
Kimble	20
Loving	20.3
Martin	18.4
Mason	21
McCulloch	15.9
Menard	26.6
Midland	19.2
Pecos	19.8
Reagan	17.4
Reeves	16.6
Schleicher	27.1
Sterling	18.6
Sutton	20
Terrell	30.8
Tom Green	17.8
Upton	20.5
Ward	21
Winkler	19.4

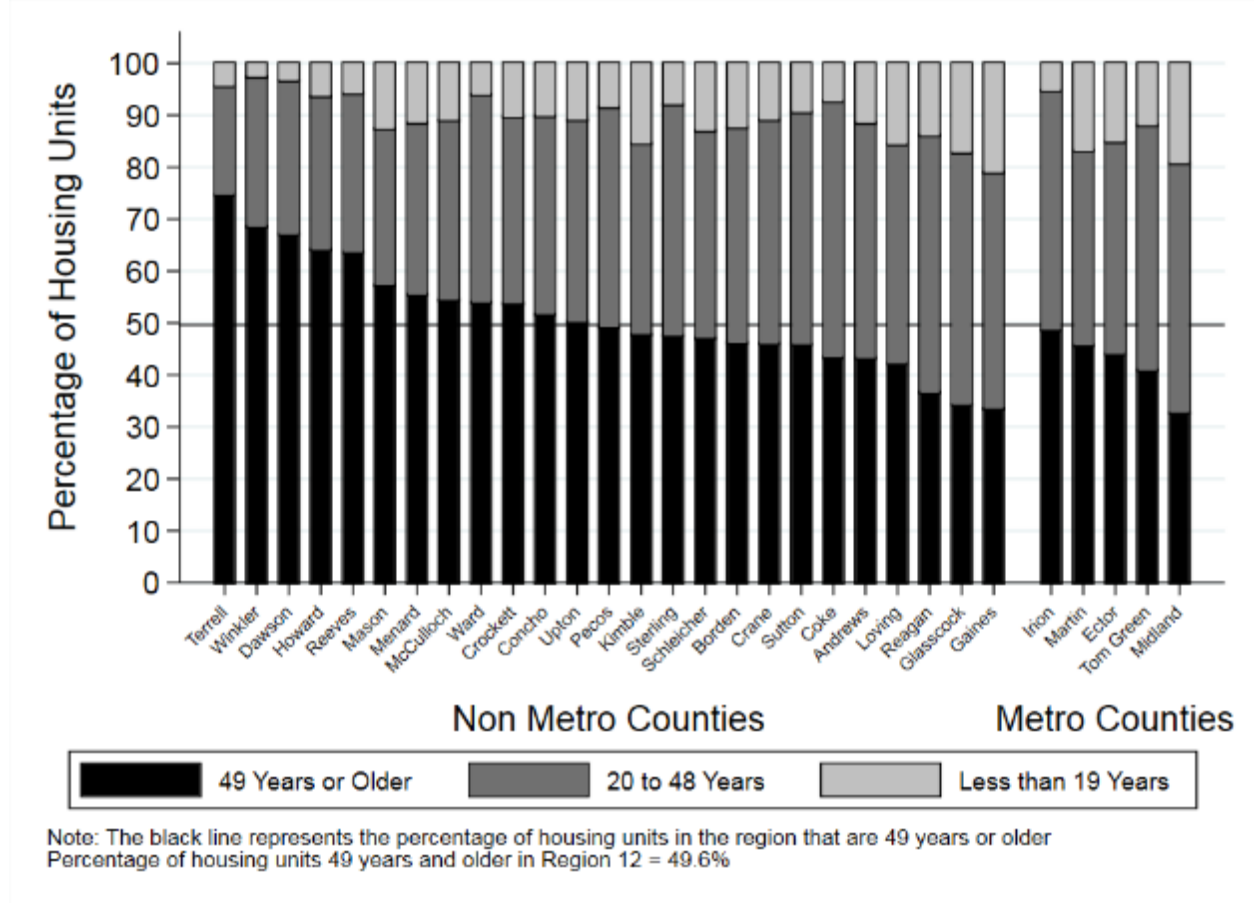
Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.



### Housing Profile

Figure 5-336 shows the age of housing stock by county in Region 12 as a percentage of the total housing stock.

**Figure 5-336: Age of Housing Stock by County, Region 12, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

In Region 12, one in two (49.6%) of housing units are older than 49 years. Region 12 has the highest rates of older housing stock of any region. Figure 5-337 shows the data visually represented in Figure 5-336 in table form.

**Figure 5-337: Age of Housing Stock by County, Region 12, 2012 to 2016**

<b>County</b>	<b>49 Years or Older</b>	<b>20 to 48 Years Old</b>	<b>Less than 19 Years Old</b>
Andrews	43.2%	45.3%	11.5%
Borden	46.2%	41.4%	12.4%
Coke	43.4%	49.2%	7.4%
Concho	51.7%	38.1%	10.2%
Crane	46.0%	43.1%	10.9%
Crockett	53.8%	35.9%	10.3%
Dawson	67.0%	29.6%	3.3%
Ector	44.0%	40.8%	15.2%
Gaines	33.5%	45.5%	21.0%
Glasscock	34.2%	48.5%	17.2%
Howard	64.1%	29.6%	6.3%
Irion	48.7%	46.0%	5.3%
Kimble	47.8%	36.7%	15.5%
Loving	42.2%	42.2%	15.6%
Martin	45.6%	37.5%	16.8%
Mason	57.3%	30.1%	12.6%
McCulloch	54.4%	34.6%	11.0%
Menard	55.5%	33.0%	11.5%
Midland	32.7%	48.0%	19.3%
Pecos	49.2%	42.3%	8.5%
Reagan	36.6%	49.4%	14.0%
Reeves	63.6%	30.5%	5.9%
Schleicher	47.1%	39.9%	13.0%
Sterling	47.6%	44.5%	7.9%
Sutton	45.9%	44.7%	9.4%
Terrell	74.6%	20.9%	4.4%
Tom Green	40.9%	47.1%	12.0%
Upton	50.2%	38.9%	10.9%
Ward	54.0%	40.0%	6.1%
Winkler	68.5%	28.8%	2.7%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-338 shows households in Region 12 experiencing one or more housing problems.

**Figure 5-338: Percent of Households with One or More Housing Problems, Region 12, 2010 to 2014**

Households with One or More Housing Problems	Metro	Non-Metro	Region 12 Total	State Total
ELI Renter Households	78.0%	61.5%	73.2%	79.4%
VLI Renter Households	77.8%	58.0%	72.8%	82.7%
LI Renter Households	54.8%	33.5%	50.1%	52.1%
MI Renter Households	31.8%	13.7%	27.3%	24.2%
Renter Households with Incomes Greater than 100% AMFI	10.8%	7.8%	10.1%	8.5%
Percent Total Renter Households	43.8%	32.6%	41.0%	48.2%
ELI Owner Households	73.9%	67.7%	71.2%	73.6%
VLI Owner Households	50.8%	32.9%	44.6%	57.2%
LI Owner Households	32.3%	19.8%	28.2%	42.8%
MI Owner Households	20.8%	16.1%	19.5%	29.0%
Owner Households with Incomes Greater than 100% AMFI	7.2%	4.5%	6.4%	9.1%
Percent Total Owner Households	20.1%	16.9%	19.1%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

Looking at all income categories and household types, Region 12 has the lowest rates of households experiencing at least one housing problem among all regions. Figure 5-339 shows renter and owner households in Region 12 that lack complete plumbing or kitchen facilities.

**Figure 5-339: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 12, 2010 to 2014**

Households Lacking Complete Plumbing or Kitchen Facilities	Metro	Non-Metro	Region 12 Total	State Total
ELI Renter Households	4.4%	2.2%	3.8%	2.7%
VLI Renter Households	4.0%	3.6%	3.9%	2.3%
LI Renter Households	4.4%	0.6%	3.6%	1.8%
MI Renter Households	1.8%	2.2%	1.9%	1.4%
Renter Households with Incomes Greater than 100% AMFI	2.5%	1.7%	2.3%	1.2%
Percent Total Renter Households	3.4%	2.0%	3.0%	1.9%
ELI Owner Households	5.3%	3.3%	4.4%	2.6%
VLI Owner Households	1.7%	2.8%	2.1%	1.6%
LI Owner Households	0.8%	1.5%	1.0%	0.8%
MI Owner Households	0.6%	1.4%	0.8%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.9%	0.4%	0.8%	0.4%
Percent Total Owner Households	1.2%	1.2%	1.2%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

## Regional Analysis

Renter households with incomes greater than 80% AMFI in Metro counties have somewhat high rates of experiencing housing problems, but rates of housing problems for all other household types are low compared to other regions.

Region 12 has the second highest rates of housing units that lack plumbing or kitchen facilities behind Region 11. Rates are particularly high compared to other regions for VLI and LI renter households and owner households with incomes greater than 100% AMFI. ELI owner households in Region 12 are more likely to lack complete facilities than ELI renter households. Renter households in Metro counties in particular have high rates of units lacking complete plumbing or kitchen facilities in Region 12. Figure 5-340 shows renter and owner households in Region 12 that are cost burdened.

**Figure 5-340: Percent of Households Experiencing Cost Burden, Region 12, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 12 Total</b>	<b>State Total</b>
ELI Renter Households	74.5%	58.8%	69.9%	77.3%
VLI Renter Households	75.4%	51.7%	69.4%	78.1%
LI Renter Households	48.6%	29.9%	44.4%	44.5%
MI Renter Households	23.3%	4.4%	18.6%	17.0%
Renter Households with Incomes Greater than 100% AMFI	4.3%	1.2%	3.6%	4.0%
Percent Total Renter Households	38.3%	27.1%	35.5%	43.3%
ELI Owner Households	69.2%	64.9%	67.3%	70.9%
VLI Owner Households	45.8%	28.5%	39.8%	52.8%
LI Owner Households	26.8%	15.4%	23.1%	37.5%
MI Owner Households	15.2%	8.3%	13.2%	24.3%
Owner Households with Incomes Greater than 100% AMFI	3.6%	1.9%	3.1%	6.9%
Percent Total Owner Households	15.8%	13.4%	15.0%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

Region 12 has relatively low rates of cost burden compared to other regions, particularly for owner households with incomes greater than 50% AMFI. Region 12 has the lowest overall rates of cost burden for renter and owner households compared to other regions, likely due to Region 12 having the lowest percentage of households in the ELI category. This is the reverse of the situation in Region 11; because Region 12 has a smaller share of households in the ELI category, which are more likely to experience cost burden, overall rates of cost burden for renter and owner households are low compared to other regions. Households in Metro counties experience cost burden at a greater rate than those in Non-Metro counties. Figure 5-341 shows renter and owner households in Region 12 that are overcrowded.

**Figure 5-341: Percent of Households Experiencing Overcrowding, Region 12, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 12 Total</b>	<b>State Total</b>
ELI Renter Households	7.7%	8.4%	7.9%	10.0%
VLI Renter Households	5.6%	4.8%	5.4%	10.7%
LI Renter Households	6.2%	4.3%	5.8%	7.9%
MI Renter Households	8.7%	7.0%	8.3%	6.2%
Renter Households with Incomes Greater than 100% AMFI	4.8%	4.7%	4.7%	3.6%
Percent Total Renter Households	6.1%	5.6%	6.0%	7.5%
ELI Owner Households	3.4%	3.0%	3.2%	5.5%
VLI Owner Households	4.5%	2.5%	3.8%	6.1%
LI Owner Households	5.9%	3.5%	5.1%	5.8%
MI Owner Households	5.2%	5.9%	5.4%	4.5%
Owner Households with Incomes Greater than 100% AMFI	2.7%	2.2%	2.5%	1.8%
Percent Total Owner Households Overcrowded	3.6%	2.9%	3.4%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

There is some overcrowding in Region 12, but less than occurs in many other regions. There is a slight spike in MI renter households experiencing overcrowding. Rates of overcrowding for VLI and LI renter and ELI and VLI owner households are low compared to other regions. ELI owner households in Region 12 are more likely to lack complete plumbing and kitchen facilities than they are to experience overcrowding, making Region 12 one of two regions where households have higher rates of lacking facilities than overcrowding in a particular income category.

**Figure 5-342: Average Housing Costs, Region 12, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$648
Average Monthly Rent	\$795

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Despite a low population, Region 12 has slightly higher costs than similarly Non-Metro regions, Region 1 and Region 2. Figure 5-343 shows the number of bedrooms in renter and owner occupied housing units in Region 12.

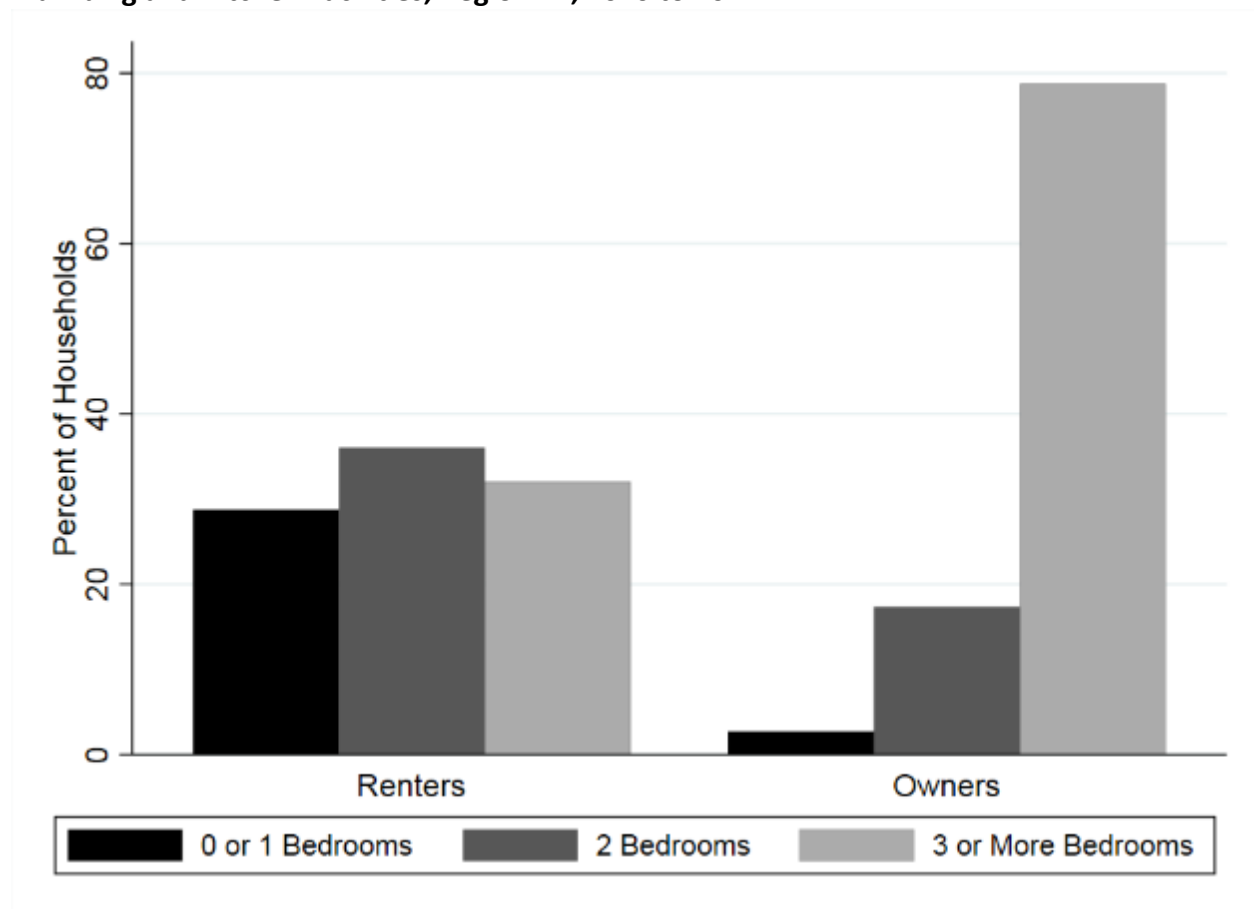
**Figure 5-343: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 12, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	64,737	29.7%	37.2%	33.1%
Owner Occupied	138,634	2.7%	17.5%	79.7%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-344 is a visual representation of the regional data from Figure 5-343.

**Figure 5-344: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 12, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

## Regional Analysis

Of occupied units in Region 12, 22.4% are renter occupied units with 2 or more bedrooms, the lowest percentage among all regions. There is a need for smaller units, especially for owners looking for 2 or fewer bedrooms, but renters have some choice across the board. Figure 5-345 maps the active multifamily properties in Region 12 participating in TDHCA programs.

**Figure 5-345: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 12, 2018**

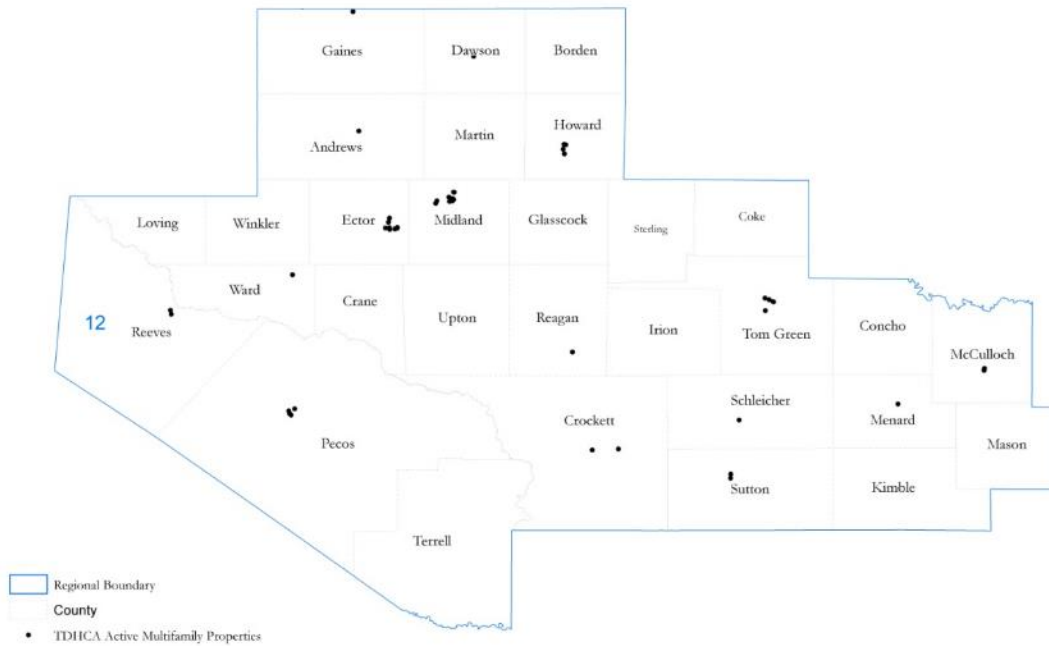


Figure 5-346 shows the number of multifamily properties participating in TDHCA programs by county in Region 12. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count” reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-346: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 12, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Andrews	1	24	24
Crockett	2	56	56
Dawson	2	104	88
Ector	10	1,081	1,053
Gaines	2	92	92
Howard	5	332	332
Kimble	1	30	30
Mason	1	45	44
McCulloch	3	148	140
Menard	1	24	24
Midland	11	1,570	1,344
Pecos	4	188	188
Reagan	1	20	20
Reeves	2	104	93
Schleicher	1	32	32
Sutton	2	64	64
Tom Green	7	752	736
Ward	1	49	44
<b>Total</b>	<b>57</b>	<b>4,715</b>	<b>4,404</b>

Source: TDHCA, Central Database, data pull from June 2018.

The sparse population of Region 12 means that the area is unlikely to have well distributed units, which is visible in Figure 5-345. The large geography of the area is covered by only 57 properties, with large stretches of land between them, and some small pockets of concentration in Midland and Ector counties, which contain the urban centers of Midland and Odessa, respectively.



## Region 13—“Upper Rio Grande”

**Point of Reference Cities:** El Paso, Alpine, Presidio, Fort Davis

### Geo-Demographic Background

Outside of the City of El Paso, the Upper Rio Grande region is a very sparsely populated and rugged region bordering Mexico. The region’s largest city, El Paso, is a major border town supporting trade with Mexico. There is some farming but, because of the desert climate, mainly ranching and grazing. Government and military installations (including Fort Bliss), wholesale and retail distribution, higher education, food processing, and various manufacturing concerns are important elements of the local economy.

Region 13, like the rest of the Rio Grande Valley, is majority Hispanic or Latino. Though home to many who identify as White, Non-Hispanic, a large majority of people in the region identify as White and Hispanic or Latino. Because of this plurality of mixed ethnic identity, the region is very integrated ethnically. However, there are certainly distinct affluent and low income communities in the region. One of only three federally recognized tribes that reside in Texas, the Ysleta del Sur tribe, resides in El Paso County. Figure 5-347 shows the counties of TDHCA Region 13.

**Figure 5-347: State of Texas’ Region 13 Counties**

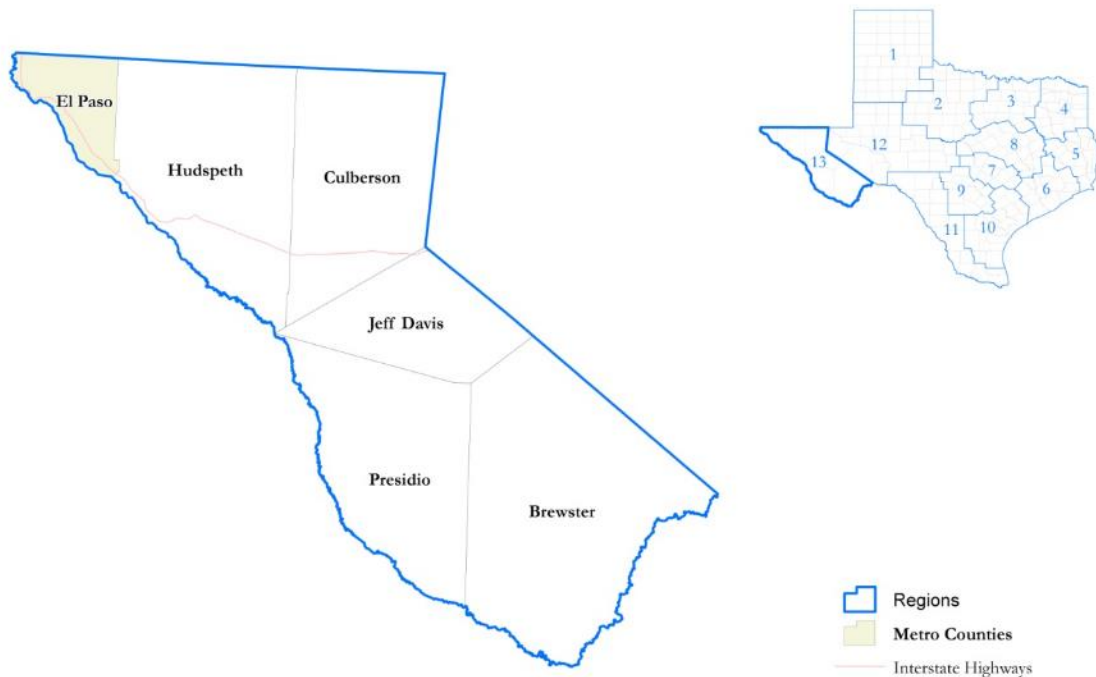


Figure 5-348 displays the population composition of Region 13 by race and ethnicity in 2010 and 2018 and population composition projections for 2020, 2030, 2040, and 2050.

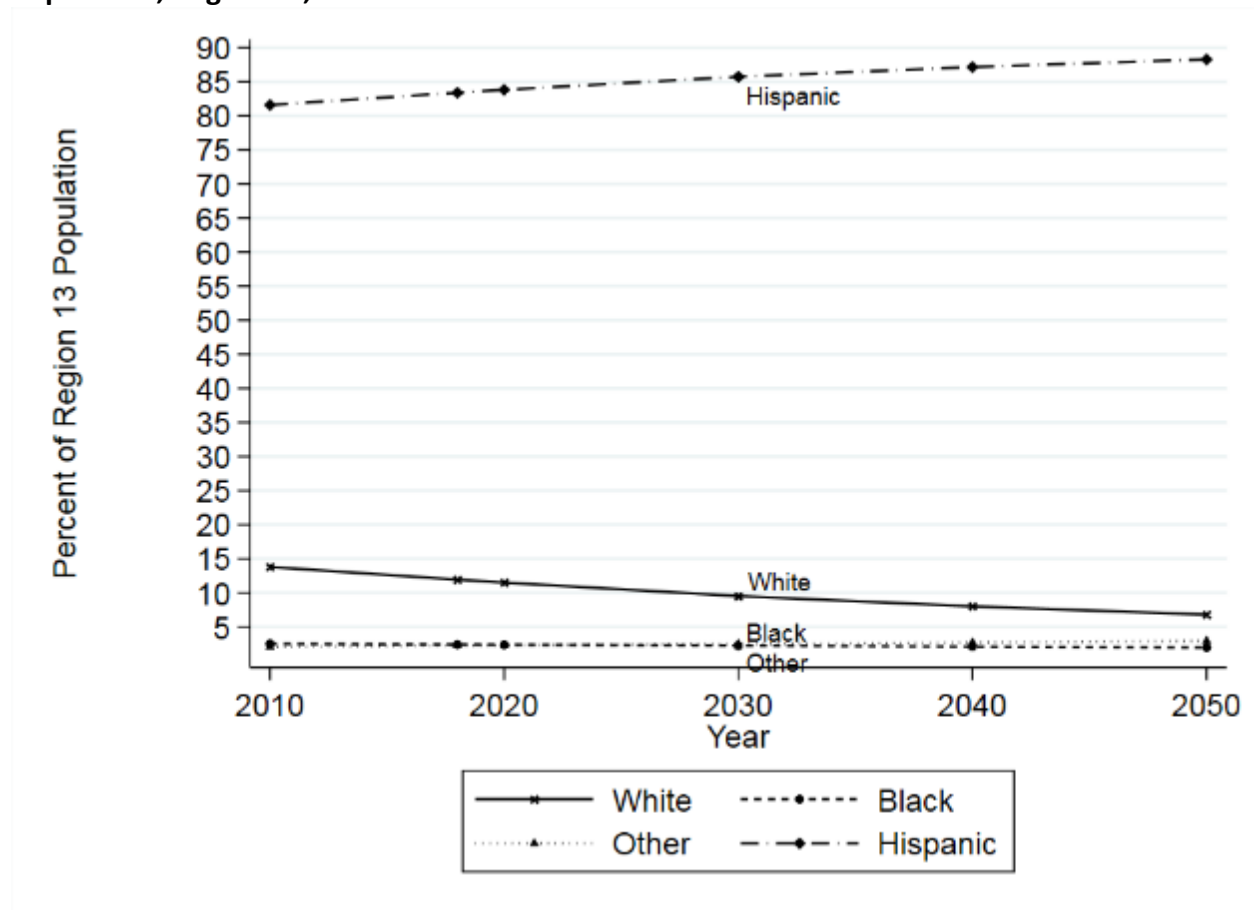
**Figure 5-348: Population Projection by Race and Ethnicity as a Percentage of the Regional Population, Region 13, 2010 to 2050**

Year	White	Black	Other	Hispanic	Total
2010	13.8%	2.5%	2.1%	81.6%	825,913
2018	11.9%	2.4%	2.3%	83.4%	924,285
2020	11.5%	2.4%	2.3%	83.8%	950,385
2030	9.5%	2.2%	2.5%	85.7%	1,079,420
2040	8.0%	2.1%	2.7%	87.2%	1,194,976
2050	6.8%	2.0%	2.9%	88.3%	1,306,261

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

Region 13 is heavily Hispanic. The Hispanic population is projected to grow, and as it grows the region will only become less diverse. The only region with a higher projected percentage of residents identifying as Hispanic in 2050 is Region 11, which is projected to be 95% Hispanic by 2050. Figure 5-349 is a visual representation of Figure 5-348.

**Figure 5-349: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 13, 2010 to 2050**



Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 5-350 shows the R/ECAPs in Region 13. Figure 5-351 shows the R/ECAPs in El Paso. A list of the census tracts designated as R/ECAPS is available in Appendix Das well.

**Figure 5-350: Map of R/ECAPS, Region 13, 2018**

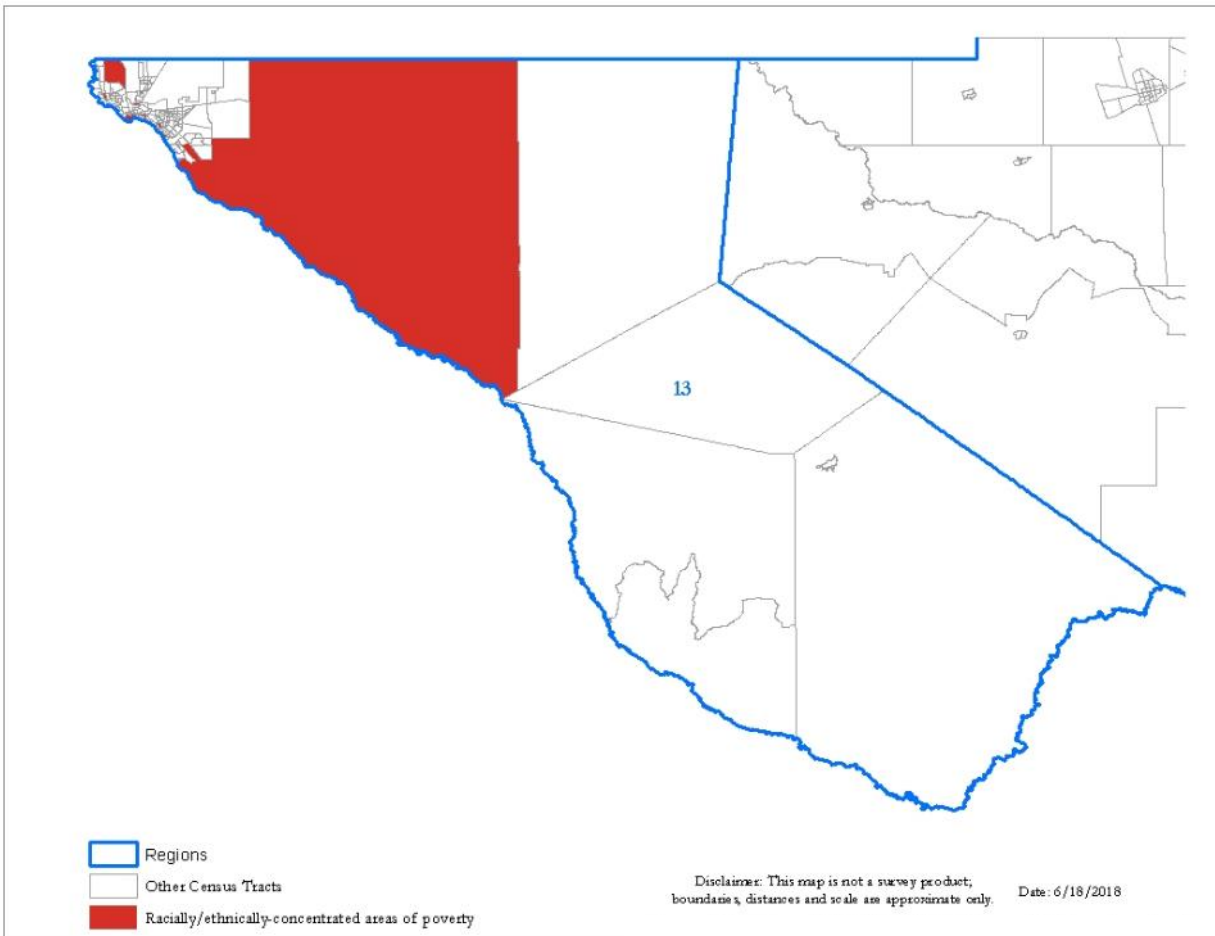


Figure 5-351: Map of R/ECAPS, El Paso, Region 13, 2018

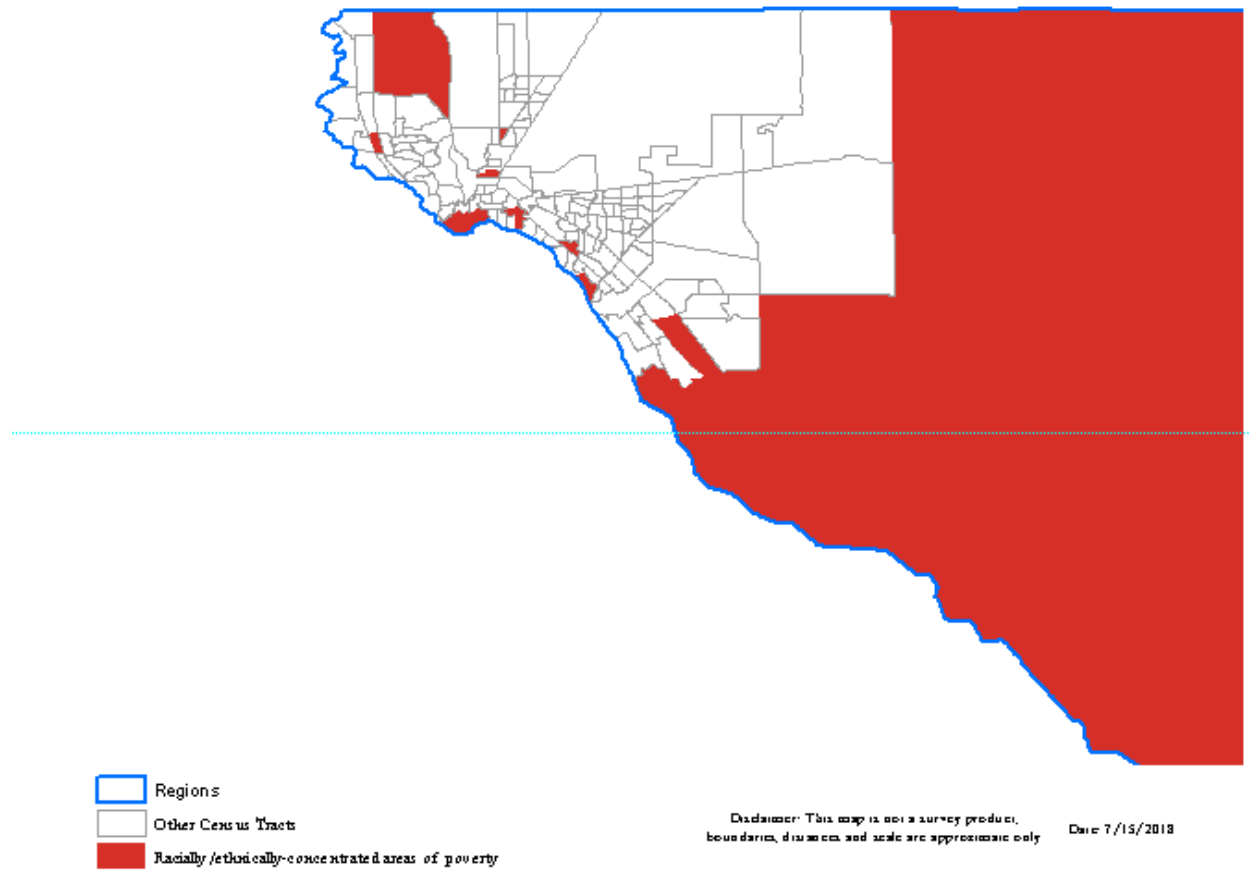
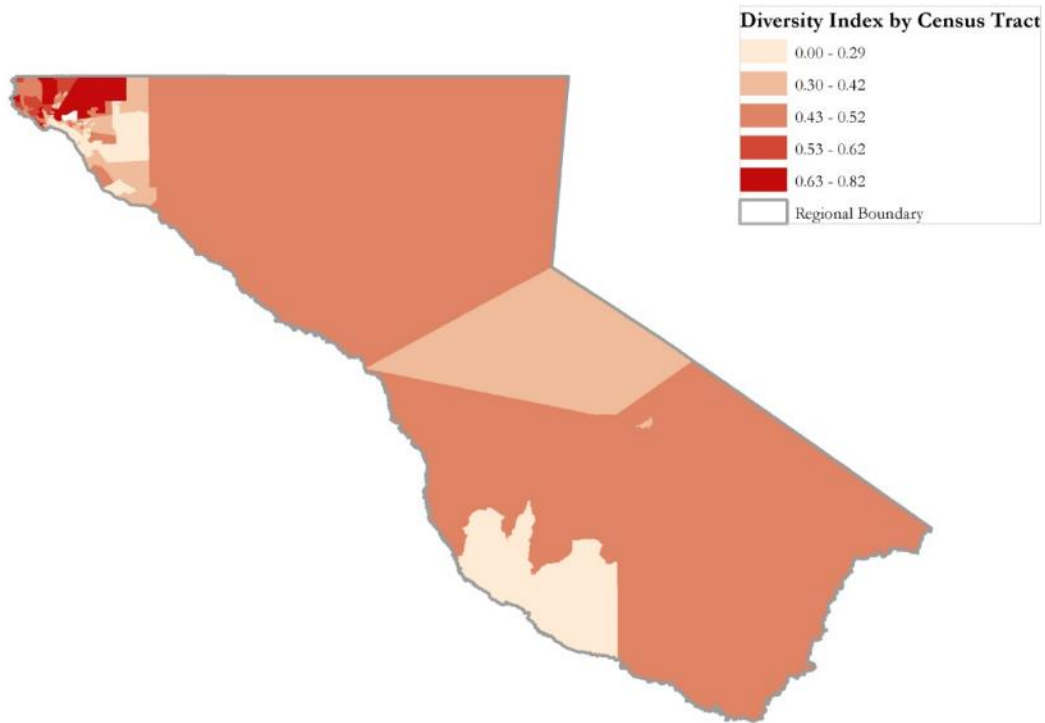


Figure 5-352 shows the Diversity Index by census tract for Region 13.

**Figure 5-352: Diversity Index, Region 13, 2018**



The entirety of Hudspeth County is considered a R/ECAP, likely because it is overwhelmingly Hispanic and experiences high rates of poverty. Other R/ECAPs in the area are spread throughout El Paso County, particularly close to the border with Mexico and Hudspeth County. In many ways, Region 13 is similar to Region 11, despite the geographic gulf between them. Region 13 is majority Hispanic, so the region as a whole has mostly lower Diversity Index values. There are some census tracts in the El Paso area and north of El Paso with greater equitable distribution of diverse populations. Detailed tables of the diversity index by census tract can be found in Appendix E.

### **Household Characteristics**

Figure 5-353 shows the household and family characteristics of Region 13 households.

**Figure 5-353: Household and Family Characteristics, Region 13, 2012 to 2016**

	Texas	Region 13
Total Households	9,289,554	270,709
Average Household Size	2.84	3.11
Percent of Households with a Minor	37.6%	42.2%
Total Family Households	6,405,049	201,541
Average Family Household Size	3.44	3.70
Average Non-Family Household Size	1.28	1.19

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1101.

Region 13 has the second largest average household and family household size among all regions, as well as the second smallest average non-family household size behind Region 11. While Region 13 has the second highest percentage of households with a minor among all regions (behind Region 11), it also has the third lowest percentage of male-headed households with a minor and second lowest percentage of female-headed households with a minor among all regions.

## Income

Figure 5-354 displays the percentage of the regional population by household income category and race and ethnicity for Region 13. After Region 11, Region 13 has the lowest percent of households with incomes greater than 100% AMFI, 43.6%. Region 13 has the second lowest rate of Black or African American households in the ELI category, at 8.5%, followed by Region 11, with 8.1%. Region 13 has the second highest percent of Black or African American households with incomes greater than 100% AMFI, however, Black or African American households make up only 2.4% of the region's population. Like many other regions, just over 30% of Hispanic households have incomes at or below 50% AMFI, and just over one third of Hispanic households have incomes greater than 100% AMFI. Hispanic households make up almost 85% of the region.

**Figure 5-354: Household Income Category by Race and Ethnicity, Region 13, 2010 to 2014**

	Texas	Region 13	White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or Other Pacific Islander	Some Other Race, Includes Two or More Races	Hispanic of Any Race
ELI	13.0%	14.2%	6.8%	8.5%	8.5%	16.2%	5.3%	14.3%	16.5%
VLI	12.2%	14.1%	6.7%	9.4%	6.7%	9.1%	12.3%	5.9%	16.4%
LI	16.8%	18.0%	13.4%	17.3%	16.1%	14.0%	21.1%	14.1%	19.3%
MI	9.5%	10.0%	9.3%	8.9%	8.1%	20.5%	21.1%	8.0%	10.2%
Greater than 100 Percent AMFI	48.5%	43.6%	63.8%	56.0%	60.6%	40.2%	40.4%	57.7%	37.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 13, 14.1% has a disability, which is slightly higher than the state's rate of 11.6%. Region 13 has the highest rate of disability in Non-Metro counties, where more than one in five individuals has a disability. While this is significant, it is important to note that the Non-Metro population of Region 13 is significantly smaller than other regions at only 20,651 individuals. For comparison, the next smallest Non-Metro population is almost 5 times larger (Region 9 with 102,832 individuals).

Figure 5-355 shows prevalence of disability by disability type in Region 13, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. The Non-Metro counties of Region 13 has the highest rate of hearing, vision, ambulatory, and independent living difficulties that any other Non-Metro region. With El Paso County and Hudspeth County being the only Metro counties in the Region, in Non-Metro counties, individuals with disabilities likely have to drive a significant distance to access services.

**Figure 5-355: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 13, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Civilian Non-Institutionalized Population	26,478,868	831,432	810,781	20,651
Population With a Disability	3,083,141	117,333	112,817	4,516
Percent of Population with a Disability	11.6%	14.1%	13.9%	21.9%
Percent of Population with a Hearing Difficulty	3.4%	4.1%	4.0%	9.5%
Percent of Population with a Vision Difficulty	2.5%	4.1%	4.1%	5.5%
Percent of Population with a Cognitive Difficulty	4.3%	5.0%	4.9%	7.5%
Percent of Population with an Ambulatory Difficulty	6.1%	7.3%	7.2%	12.5%
Percent of Population with a Self-Care Difficulty	2.4%	2.9%	2.8%	5.1%
Percent of Population with an Independent Living Difficulty	3.9%	4.8%	4.7%	7.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-356 shows the percent of the civilian non-institutionalized population with a disability in Region 13 by gender and age. Higher rates of disability amongst children, males, and females is consistent with the higher overall rate of disability in Region 13 compared to the state. Children in the Non-Metro counties of Region 13 experience lower rates of disabilities than children in the Metro counties of the region.

**Figure 5-356: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 13, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Percent of Population with a Disability	11.6%	14.1%	13.9%	21.9%
Percent of Males with a Disability	11.5%	14.1%	13.9%	21.9%
Percent of Female with a Disability	11.8%	14.2%	14.0%	21.8%
Percent of Minors With a Disability	4.2%	4.8%	4.8%	4.2%
Percent of Children Under Age 5 with a Disability	0.8%	1.1%	1.1%	0.6%
Percent of Children Aged 5-17 with a Disability	5.5%	6.2%	6.2%	5.6%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

Figure 5-357 shows the percent of the civilian non-institutionalized population with a disability in Region 13 by race and ethnicity. Region 13 has the highest rate of disability among Hispanic or Latino individuals in both Metro and Non-Metro counties, at 13.7% and 22.0% respectively. Region 13 is 83.4% Hispanic or Latino.

**Figure 5-357: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 13, 2012 to 2016**

Population Group	Texas	Region Total	Metro	Non-Metro
Total Population	11.6%	14.1%	13.9%	21.9%
White	11.9%	14.3%	14.1%	22.1%
Black or African American	13.4%	13.9%	13.9%	37.5%
American Indian or Alaskan Native	15.8%	16.6%	16.7%	15.1%
Asian	5.7%	7.4%	7.4%	7.8%
Hawaiian or Other Pacific Islander	8.5%	8.3%	8.3%	0.0%
Some Other Race	9.2%	13.2%	13.2%	16.0%
Two or More Races	11.1%	12.5%	12.0%	51.5%
Hispanic or Latino	9.5%	13.9%	13.7%	22.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1810.

## Poverty

After Region 11, Region 13 has the second highest overall poverty rate in the state at 22.4%. Figure 5-358 shows the prevalence of poverty in Region 13 by poverty level.

**Figure 5-358: Poverty Rates by Poverty Level, Region 13, 2012 to 2016**

	Texas	Region 13
Total Population for Whom Poverty Status is Determined	26,334,005	842,165
Below 100% Poverty (Overall Poverty Rate)	16.7%	22.4%
Below 50% of Poverty	7.0%	8.2%
Below 150% of Poverty	27.3%	37.3%
Below 200% of Poverty	37.2%	50.0%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.



## Regional Analysis

Figure 5-359 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 13 by age, gender, and race and ethnicity. Across demographic groups, poverty in Region 13 is higher than each group’s statewide average. Compared to other regions, Region 13 has the second highest poverty rate among children, males, females, White individuals, and persons who identify as some other race. Hispanic or Latino individuals make up more than 80% of the population of Region 13, and more than 1 in 4 Hispanic or Latino individuals live below the poverty line.

**Figure 5-359: Poverty Rates by Age, Gender and Race/Ethnicity, Region 13, 2012 to 2016**

	<b>Texas</b>	<b>Region 13</b>
Total Population for Whom Poverty Status is Determined	26,334,005	842,165
Below 100% Poverty (Overall Poverty Rate)	16.7%	22.4%
Metro County	16.4%	22.5%
Non-Metro County	18.7%	16.9%
Under 18	23.9%	31.1%
Male	15.2%	20.2%
Female	18.2%	24.4%
White	15.5%	22.0%
Black or African American	22.6%	14.9%
American Indian and Alaskan Native	21.2%	24.0%
Asian	11.1%	8.6%
Hawaiian and Other Pacific Islander	14.0%	19.9%
Some Other Race	24.4%	31.3%
Two or More Races	17.2%	15.1%
Hispanic or Latino	24.2%	25.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table S1701.

### Employment

Figure 5-360 shows the share of job counts by distance between the Work Census Block and the Home Census Block of individuals in the El Paso, TX CBSA. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 5-360: Share of Job Counts by Distance between Work Census Block and Home Census Block, El Paso CBSA, TX, Region 13, 2015**

	<b>Count</b>	<b>Share</b>
Total All Jobs	297,907	100.0%
Less than 10 miles	191,109	64.2%
10 to 24 miles	84,615	28.4%
25 to 50 miles	5,585	1.9%
Greater than 50 miles	16,598	5.6%

Source: Job center information, On the Map data tool 2015, Census.gov.

Region 13 has the lowest rate of people working in the CBSA and driving more than 25 miles to work; more than 90% of job holders in the CBSA driving less than 25 miles to work. Figure 5-361 shows the employment and living situation of individuals in each county of Region 13. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. El Paso is the job center for the region and contains more than 97% of the jobs in the entire region.

**Figure 5-361: Employment and Living Situations, Counties in Region 13, 2015**

County	Lived Outside of County, Worked in County	Lived and Worked in County	Lived in County, Worked Outside of County	Percent that Lived in County and Worked Outside of County
Brewster	1,328	2,403	1,409	37.0%
Culberson	400	332	445	57.3%
El Paso	27,752	269,353	19,030	6.6%
Hudspeth	571	231	605	72.4%
Jeff Davis	732	307	378	55.2%
Presidio	759	669	1,131	62.8%
Total	31,542	273,295	22,998	7.8%

Source: On the map data, 2015, with out of state employment data excluded.

Figure 5-362 shows the mean travel time to work for counties in Region 13.

**Figure 5-362: Mean Travel Time to Work, Counties in Region 13, 2012 to 2016**

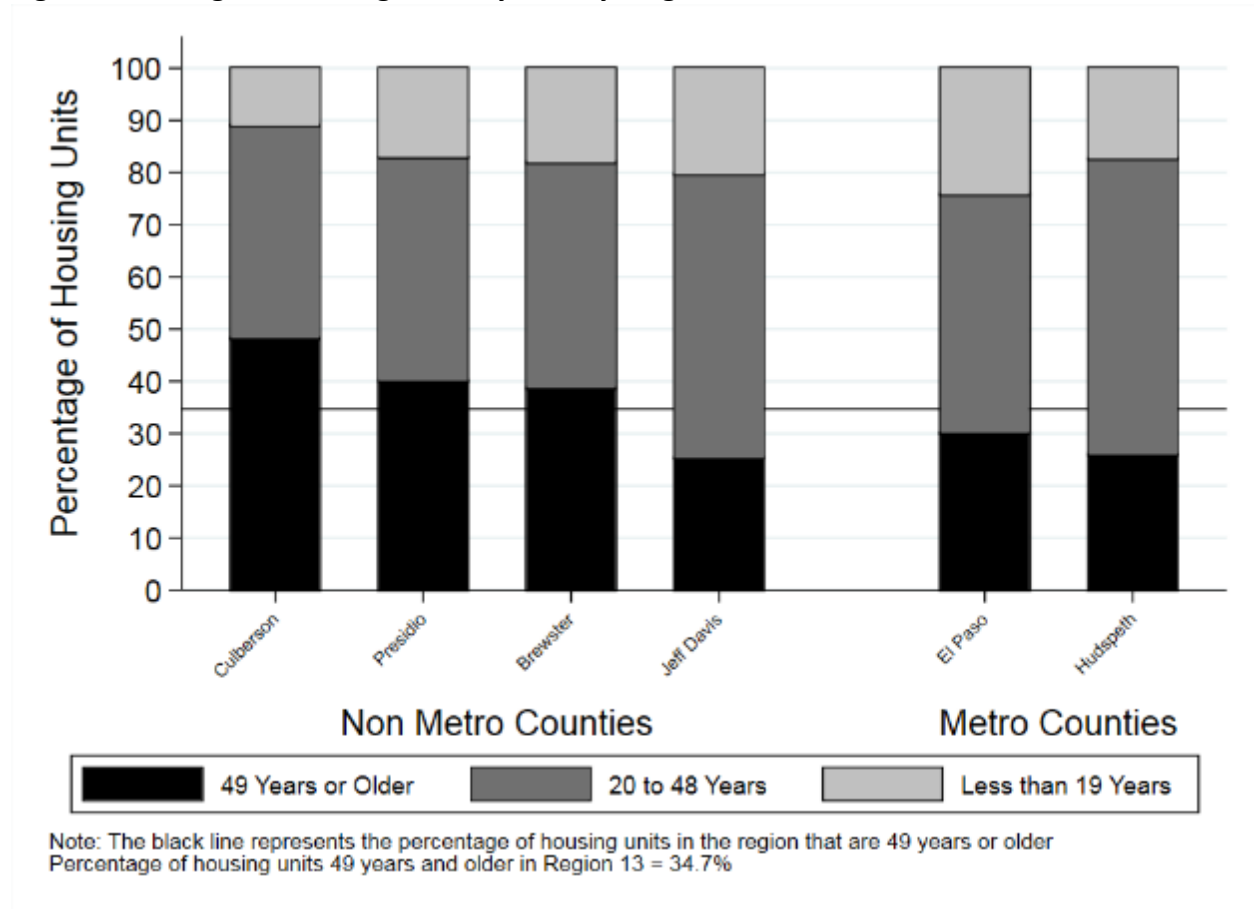
County	Mean travel time to work (minutes)
Brewster	13.4
Culberson	11
El Paso	23.3
Hudspeth	26.6
Jeff Davis	19.7
Presidio	14

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 5-363 shows the age of housing stock by county in Region 13 as a percentage of the total housing stock.

**Figure 5-363: Age of Housing Stock by County, Region 13, 2012 to 2016**



Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

The housing stock in Region 13 is slightly older than other regions with a large MSA, but not as old as regions with a more prevalent Non-Metro population. Figure 5-364 shows the data visually represented in Figure 5-363 in table form.

**Figure 5-364: Age of Housing Stock by County, Region 13, 2012 to 2016**

County	49 Years or Older	20 to 48 Years Old	Less than 19 Years Old
Brewster	38.7%	43.2%	18.1%
Culberson	48.2%	40.8%	11.0%
El Paso	30.1%	45.7%	24.2%
Hudspeth	25.9%	56.7%	17.4%
Jeff Davis	25.3%	54.3%	20.4%
Presidio	40.1%	42.9%	17.1%

Source: American Community Survey 5 Year Estimates, 2012 to 2016, Table DP04.

Note: Percentages may not add to 100% due to rounding.

Figure 5-365 shows households in Region 13 experiencing one or more housing problems.

**Figure 5-365: Percent of Households with One or More Housing Problems, Region 13, 2010 to 2014**

<b>Households with One or More Housing Problems</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 13 Total</b>	<b>State Total</b>
ELI Renter Households	70.5%	45.8%	69.9%	79.4%
VLI Renter Households	74.0%	61.1%	73.7%	82.7%
LI Renter Households	59.0%	35.5%	58.2%	52.1%
MI Renter Households	34.5%	14.2%	33.9%	24.2%
Renter Households with Incomes Greater than 100% AMFI	11.0%	8.4%	10.9%	8.5%
Percent Total Renter Households	49.4%	31.8%	48.9%	48.2%
ELI Owner Households	70.7%	51.8%	69.9%	73.6%
VLI Owner Households	54.6%	27.8%	53.4%	57.2%
LI Owner Households	43.7%	24.0%	43.0%	42.8%
MI Owner Households	27.5%	28.7%	27.5%	29.0%
Owner Households with Incomes Greater than 100% AMFI	10.3%	8.4%	10.3%	9.1%
Percent Total Owner Households	27.5%	20.4%	27.2%	24.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 1.

Compared to other regions, ELI and VLI renter households and Non-Metro owner households in Region 13 have low rates of experiencing at least one housing problem. ELI and VLI owner households in Metro counties have average rates of experiencing housing problems. High rates of experiencing at least one housing problem for LI and MI renter households in Metro counties are significant enough to make LI and MI renter households in Region 13 the most likely to experience housing problems among all LI and MI renter households, despite low rates in Non-Metro counties. Owner households in Region 13 have relatively average rates compared to the rest of the state, with the exception of high rates for MI owners in Non-Metro counties. Figure 5-366 shows renter and owner households in Region 13 that lack complete plumbing or kitchen facilities.

**Figure 5-366: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 13, 2010 to 2014**

<b>Households Lacking Complete Plumbing or Kitchen Facilities</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 13 Total</b>	<b>State Total</b>
ELI Renter Households	2.3%	7.0%	2.4%	2.7%
VLI Renter Households	2.3%	0.8%	2.2%	2.3%
LI Renter Households	1.5%	8.2%	1.7%	1.8%
MI Renter Households	0.7%	3.2%	0.8%	1.4%
Renter Households with Incomes Greater than 100% AMFI	1.1%	1.5%	1.1%	1.2%
Percent Total Renter Households	1.7%	4.1%	1.7%	1.9%
ELI Owner Households	1.8%	3.9%	1.9%	2.6%
VLI Owner Households	1.7%	1.2%	1.6%	1.6%
LI Owner Households	0.7%	1.9%	0.8%	0.8%
MI Owner Households	0.9%	0.0%	0.9%	0.6%
Owner Households with Incomes Greater than 100% AMFI	0.4%	0.9%	0.4%	0.4%
Percent Total Owner Households	0.8%	1.4%	0.8%	0.8%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 3.

Region 13’s rates of households lacking complete plumbing or kitchen facilities are relatively close to statewide figures, although significantly lower for MI renter and ELI owner households. Figure 5-367 shows renter and owner households in Region 13 that are cost burdened.

**Figure 5-367: Percent of Households Experiencing Cost Burden, Region 13, 2010 to 2014**

<b>Households Cost Burdened</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 13 Total</b>	<b>State Total</b>
ELI Renter Households	68.1%	43.1%	67.5%	77.3%
VLI Renter Households	69.5%	57.4%	69.1%	78.1%
LI Renter Households	52.3%	22.8%	51.3%	44.5%
MI Renter Households	25.7%	11.0%	25.2%	17.0%
Renter Households with Incomes Greater than 100% AMFI	5.0%	2.0%	4.9%	4.0%
Percent Total Renter Households	44.1%	24.9%	43.5%	43.3%
ELI Owner Households	69.2%	48.0%	68.3%	70.9%
VLI Owner Households	49.5%	23.5%	48.3%	52.8%
LI Owner Households	37.1%	17.2%	36.3%	37.5%
MI Owner Households	21.4%	20.4%	21.4%	24.3%
Owner Households with Incomes Greater than 100% AMFI	6.6%	4.9%	6.5%	6.9%
Percent Total Owner Households	23.1%	15.6%	22.8%	21.7%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 8.

## Regional Analysis

While ELI and VLI renter households in Metro counties of Region 13 have the lowest rates of cost burden compared to other regions, Metro renter households with incomes greater than 50% have relatively high rates of cost burden. Because the majority of Region 13's population is in Metro counties, this trend carries over to overall renter rates. Owner households have average rates of cost burden relatively close to state figures. Metro households in Region 13 have higher rates of cost burden than Non-Metro households. Figure 5-368 shows renter and owner households in Region 13 that are overcrowded.

**Figure 5-368: Percent of Households Experiencing Overcrowding, Region 13, 2010 to 2014**

<b>Renter Households Overcrowded (&gt;1 Person per Room)</b>	<b>Metro</b>	<b>Non-Metro</b>	<b>Region 13 Total</b>	<b>State Total</b>
ELI Renter Households	10.0%	6.3%	9.9%	10.0%
VLI Renter Households	11.8%	3.8%	11.6%	10.7%
LI Renter Households	9.2%	7.2%	9.1%	7.9%
MI Renter Households	8.9%	1.3%	8.6%	6.2%
Renter Households with Incomes Greater than 100% AMFI	5.2%	5.7%	5.2%	3.6%
Percent Total Renter Households	8.8%	5.4%	8.7%	7.5%
ELI Owner Households	5.4%	1.8%	5.3%	5.5%
VLI Owner Households	7.9%	3.1%	7.7%	6.1%
LI Owner Households	8.3%	6.9%	8.3%	5.8%
MI Owner Households	6.0%	9.3%	6.1%	4.5%
Owner Households with Incomes Greater than 100% AMFI	3.3%	2.6%	3.3%	1.8%
Percent Total Owner Households Overcrowded	5.1%	4.0%	5.1%	3.3%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 10.

Region 13 has the second highest rates of overcrowding behind Region 11, though Region 13's rates are considerably lower than those of Region 11. Rates are higher in Metro counties than in Non-Metro counties, and higher for renter households than for owner households. ELI and VLI renter households in Metro counties have the highest rates among Region 11 households, though rates are higher for VLI than for ELI households. Figure 5-369 shows the average housing costs in Region 13.

**Figure 5-369: Average Housing Costs, Region 13, 2015**

Average Monthly Owner Cost (With a Mortgage)	\$727
Average Monthly Rent	\$677

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2018.

Among the regions with a large MSA, Region 13 has the lowest average housing costs, as shown in Figure 5-369. Figure 5-370 shows the number of bedrooms in renter and owner occupied housing units in Region 13.

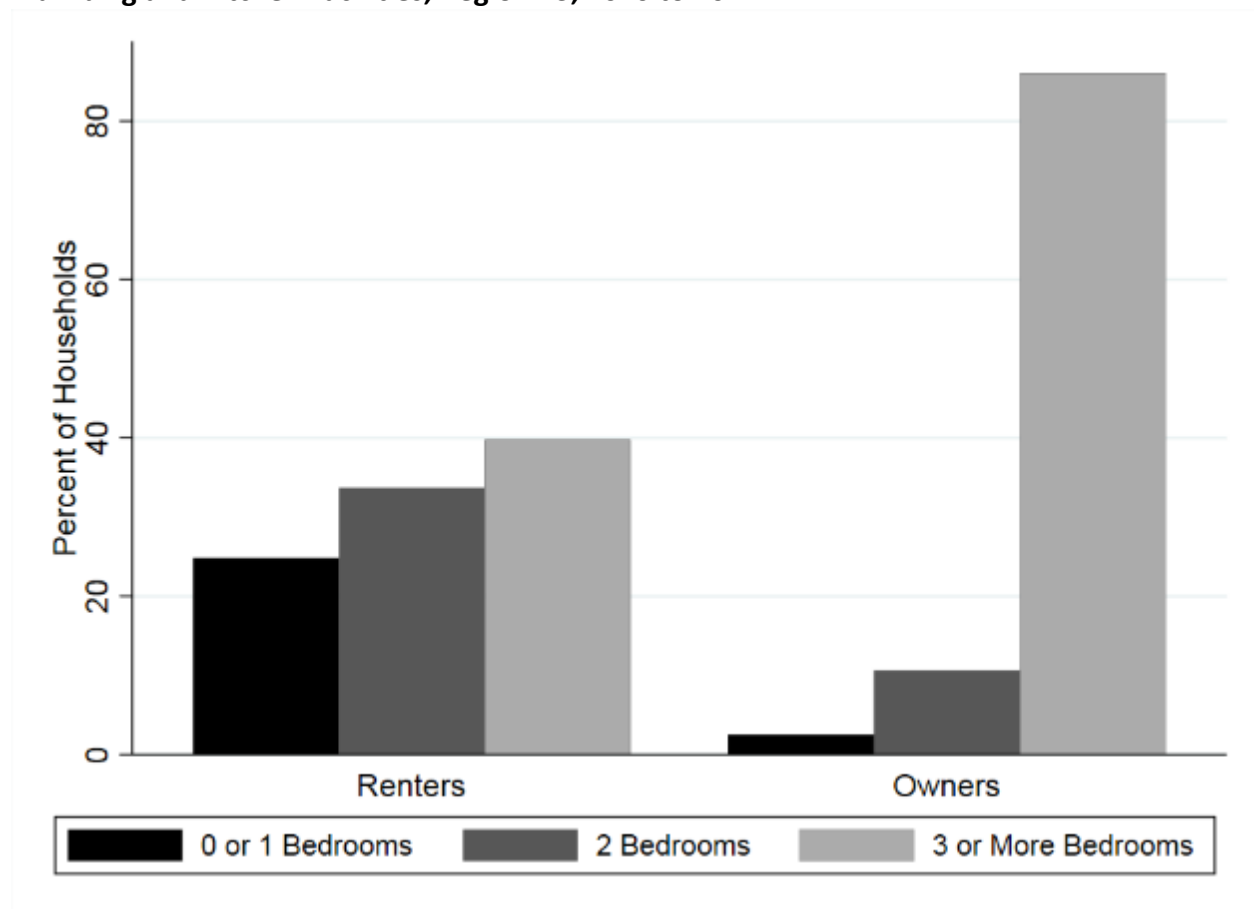
**Figure 5-370: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 13, 2010 to 2014**

	Total Units	Percent of Units with 0 or 1 Bedrooms	Percent of Units with 2 Bedrooms	Percent of Units with 3 or More Bedrooms
Renter Occupied	99,956	25.2%	34.3%	40.5%
Owner Occupied	164,232	2.6%	10.7%	86.7%
State Renter Occupied	3,298,169	31.6%	36.7%	31.7%
State Owner Occupied	5,609,144	2.2%	13.2%	84.6%

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

Figure 5-371 is a visual representation of the regional data from Figure 5-370.

**Figure 5-371: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 13, 2010 to 2014**



Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2010 to 2014, Table 15a, Table 15b, and Table 15c.

## Regional Analysis

Of total occupied units in Region 13, 69.2% consist of 3 or more bedrooms, the highest percentage among all regions. This is due in part to the particularly high percentage of renter occupied units with 3 or more bedrooms, 15.3% of total units. Only 19.6% of total occupied units in Region 13 consist of 2 bedrooms, the lowest among all regions, which evens out the percentage of units with 2 or more units.

Despite a high poverty rate and income gaps, households in Region 13 experience fewer housing problems overall compared to other regions. Housing in the Non-Metro counties is likely to be very affordable, as less than a quarter of households in those areas are cost burdened. In the Metro county of El Paso, that number spikes to almost 45% of renters and a quarter of owners. Still, these levels are far below those in other regions, even for ELI and VLI owner and renter households. The distribution of unit sizes bears this out, with a large number of units with 3 or more bedrooms available to both renters and owners. Figure 5-372 maps the active multifamily properties in Region 13 participating in TDHCA programs.

**Figure 5-372: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 13, 2018**

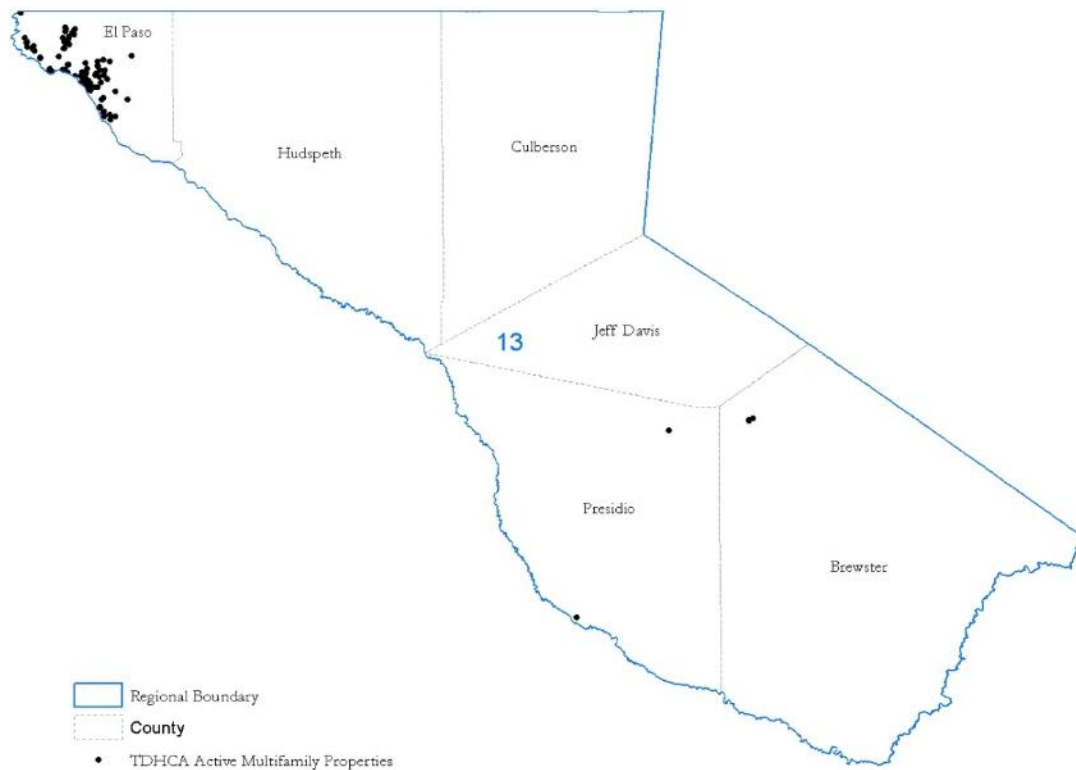


Figure 5-373 shows the number of multifamily properties participating in TDHCA programs by county in Region 13. Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled “Active Property Unit Count”



## Regional Analysis

reflects the total units at the properties in a county (both subsidized and market rate) while the column titled “Active Property Program Unit Count” reflects only the number of rent-restricted affordable units at the properties in a county.

**Figure 5-373: Counties with Active Multifamily Properties Participating in TDHCA Programs, Region 13, 2018**

<b>County</b>	<b>Active Property Count</b>	<b>Active Property Unit Count</b>	<b>Active Property Program Unit Count</b>
Brewster	3	116	116
El Paso	129	11,231	10,757
Presidio	2	54	54
<b>Total</b>	<b>134</b>	<b>11,401</b>	<b>10,927</b>

Source: TDHCA, Central Database, data pull from June 2018.

Active multifamily properties participating in TDHCA programs are predominately located in the population and job center of El Paso. El Paso County contains almost 130 TDHCA multifamily properties, while only 5 exist in all other counties of the region combined. However, since there are fewer than 25,000 people in the Non-Metro counties of Region 13, there is also less need for units.

## Chapter 6 - Assisted Housing Program and Portfolio Analysis

This chapter uses data from the Texas Department of Housing and Community Affairs' (TDHCA) programs to analyze and compare demographics of eligible program participants to actual persons served by the program. The analysis is meant to examine market areas where protected classes have limited options in the private market and/or opportunities for TDHCA to improve provision of programs to protected classes. It is important to note that the provision of programs may be limited by HUD regulations and program eligibility criteria.

In the following tables, demographic data will be presented to match income eligibility for the programs discussed. If a program is available to households with incomes at or below 50% Area Median Family Income (AMFI), data regarding program participants will be compared to statewide and county figures from HUD's Comprehensive Housing Affordability Strategy (CHAS) data for households at or below 50% AMFI. The income categories used by CHAS are as follows:

- Extremely Low Income (ELI): at or below 30% AMFI;
- Very Low Income (VLI): greater than 30% but less than or equal to 50% AMFI;
- Low Income (LI): greater than 50% but less than or equal to 80% AMFI;
- Moderate Income (MI): greater than 80% but less than or equal to 100% AMFI; and
- Greater than 100% AMFI.

### Single Family HOME Program

The purpose of the HOME Investment Partnerships (HOME) Program is to expand the supply of decent, safe, and affordable housing for ELI, VLI, and LI households and to alleviate the problems of excessive rent burdens, barriers to homeownership, and deteriorating housing stock. Five activities are funded through the HOME Program: Contract for Deed (CFD), Homebuyer Assistance (HBA), Homeowner Rehabilitation Assistance (HRA) Single Family Development (SFD), and Tenant-Based Rental Assistance (TBRA). HOME Program activities provide assistance as follows:

- CFD provides funds to households for the acquisition or the refinancing of their contract for deed, replacing it with a mortgage loan secured by a deed of trust. Assistance is provided in conjunction with the rehabilitation or reconstruction of the property.
- HBA provides down payment and closing cost assistance to eligible homebuyers for the acquisition of affordable single-family housing.
- HRA offers grants or zero-interest deferred forgivable loans for rehabilitation, reconstruction, or new construction of dilapidated housing units to homeowners.
- SFD is a Community Housing Development Organization (CHDO) set-aside activity, which includes acquisition and new construction or rehabilitation of affordable single family housing. CHDO set-aside projects are owned, developed, or sponsored by the CHDO and result in the development of multifamily rental units or single-family homeownership.
- TBRA provides rental subsidy and security and utility deposit assistance and requires that the tenant participates in a self-sufficiency program.

Households receiving assistance through HBA, HRA, SFD, and TBRA must have an income at or below 80% AMFI, while households receiving assistance through CFD must have an income at or below 60% AMFI and must reside in a colonia. TDHCA defines a colonia as:

*a geographic area located in a county some part of which is within 150 miles of the international border of this state, consists of 11 or more dwellings that are located in close proximity to each other in an area that may be described as a community or neighborhood, has a majority population composed of individuals and families with low income and very low income, based on the federal OMB poverty index and meets the qualifications of an economically distressed area under Section 17.921, Water Code; or has the physical and economic characteristics of a colonia, as determined by the department.*

This definition may differ from the definition used by other agencies and organizations. Due to the lack of data regarding households with incomes at or below 60% AMFI, households with incomes at or below 80% AMFI will be used as the eligibility measure for comparison.

For the purpose of relevant analysis, SFY 2013 - 2017 HBA and TBRA activities are grouped into one table (Figure 6-1) to be compared directly to renter households experiencing one or more severe housing problem with incomes at or below 80% AMFI (Figure 6-2). SFY 2013 - 2017 CFD and HRA activities are grouped into another table (Figure 6-3) and compared directly to owner households experiencing one or more severe housing problem with incomes at or below 80% AMFI (Figure 6-4). Households with one or more of the four severe housing problems, either lack complete kitchen or plumbing facilities, are overcrowded (more than 1 persons per room), or are severely cost burdened (paying more than 50% of their income for housing costs). Households for whom cost burden data could not be computed may be excluded from these figures. County-level data are only shown for counties with at least 30 participant households for a given HOME Program activity. El Paso County was the only county with CFD activity in SFY 2013 - 2017.

Although the HOME Program reports race and ethnicity separately, for the sake of comparison race and ethnicity have been combined in Figure 6-1 and Figure 6-3. All HOME Program participant households that identified as Hispanic or Latino were categorized as Hispanic or Latino, regardless of race. Those who identified as Not Hispanic or Latino were categorized depending on their self-identified race. Note that the same address may have generated more than one program activity and each instance is counted separately.

Because no one county had more than 29 SFD activities in SFY 2013 - 2017, SFD is not reported in the following tables. SFD activities are not included in state total figures.

## **HBA and TBRA**

TDHCA administers the Home Buyer Assistance (HBA) program as well as Tenant Based Rental Assistance (TBRA) programs utilizing HUD CPD funds. These programs helped more than 2,500 households across Texas between 2013 and 2017.

**Figure 6-1: SFY 2013 - 2017 Percent of HOME Program HBA and TBRA Activity Participant Households in Counties with 30 or more HBA or TBRA Participant Households by Race and Ethnicity**

County	Activity Group	American Indian/ Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/ Other Pacific Islander	White	Other or Multiple Race/ Ethnicity	Total Households
Angelina	TBRA	0.0%	0.6%	29.9%	13.6%	0.0%	54.2%	1.7%	177
Bexar	TBRA	0.0%	0.6%	24.2%	37.6%	0.0%	34.8%	2.8%	178
Bowie	TBRA	0.0%	3.0%	54.5%	3.0%	0.0%	30.3%	9.1%	33
Brown	TBRA	0.0%	0.0%	12.7%	20.0%	0.0%	65.5%	1.8%	55
Cameron	HBA	0.0%	0.0%	0.0%	98.7%	0.0%	1.3%	0.0%	78
Comal	TBRA	0.4%	0.0%	7.3%	48.2%	0.4%	42.0%	1.8%	562
Coryell	TBRA	0.0%	0.0%	32.5%	20.0%	0.0%	47.5%	0.0%	40
Ector	TBRA	0.0%	0.0%	21.8%	16.4%	0.0%	61.8%	0.0%	55
Gregg	TBRA	0.0%	0.0%	46.6%	1.7%	0.0%	51.7%	0.0%	58
Henderson	TBRA	0.0%	0.0%	25.9%	7.4%	0.0%	66.7%	0.0%	54
Jefferson	TBRA	0.0%	0.0%	54.8%	4.8%	0.0%	35.7%	4.8%	42
Midland	TBRA	0.0%	0.0%	32.1%	33.3%	0.0%	34.6%	0.0%	78
Montgomery	TBRA	0.0%	0.0%	22.6%	3.8%	0.0%	71.7%	1.9%	53
Nacogdoches	TBRA	0.0%	0.0%	63.5%	3.8%	0.0%	28.8%	3.8%	52
Nueces	TBRA	0.0%	0.0%	10.0%	54.7%	0.0%	35.3%	0.0%	150
Parker	TBRA	0.0%	0.6%	1.2%	8.7%	0.0%	87.9%	1.7%	173
Travis	TBRA	0.0%	0.0%	38.9%	26.8%	0.0%	28.2%	6.0%	149
Williamson	HBA	0.0%	5.3%	13.2%	23.7%	0.0%	52.6%	5.3%	38
Wise	TBRA	1.3%	0.0%	0.0%	3.8%	0.0%	93.8%	1.3%	80
State Activity Total	HBA/ TBRA	0.1%	0.5%	18.7%	31.6%	0.1%	46.6%	2.3%	2,653

Source: TDHCA Central Database, SFY 2013-2017.

**Figure 6-2: Percent of Income Eligible Texas Renter Households Experiencing One or More Severe Housing Problems in Counties with 30 or More HBA and TBRA Participant Households by Race and Ethnicity**

County	American Indian/ Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/ Other Pacific Islander	White	Other or Multiple Race/ Ethnicity	Total Households
Angelina	0.0%	0.0%	34.8%	20.0%	0.0%	45.1%	0.1%	2,904
Bexar	0.2%	2.0%	11.8%	60.6%	0.1%	23.6%	1.6%	64,535
Bowie	0.0%	0.5%	48.7%	3.4%	0.0%	46.4%	1.0%	2,929
Brown	0.0%	0.0%	5.4%	11.7%	0.0%	82.9%	0.0%	555
Cameron	0.1%	0.2%	0.3%	93.2%	0.0%	6.0%	0.1%	13,560
Comal	0.0%	0.0%	2.7%	39.7%	0.0%	54.7%	2.9%	2,395
Coryell	2.1%	5.0%	14.0%	14.8%	0.8%	57.3%	5.9%	1,179
Ector	0.8%	1.2%	7.8%	53.0%	0.0%	36.3%	1.0%	3,859
Gregg	0.3%	0.3%	35.9%	11.9%	0.0%	50.7%	0.9%	5,150
Henderson	0.0%	0.2%	18.8%	12.9%	0.0%	68.0%	0.0%	1,624
Jefferson	0.2%	3.9%	53.7%	11.0%	0.3%	29.3%	1.5%	8,999
Midland	0.1%	0.7%	13.3%	34.8%	0.0%	50.0%	1.2%	3,393
Montgomery	0.1%	2.6%	10.5%	22.9%	0.4%	61.1%	2.3%	9,938
Nacogdoches	2.5%	2.1%	27.7%	12.5%	0.0%	53.5%	1.6%	2,759
Nueces	0.0%	0.8%	4.9%	65.7%	0.0%	27.2%	1.4%	12,540
Parker	2.2%	0.0%	1.2%	15.0%	0.0%	81.4%	0.2%	2,069
Travis	0.1%	5.7%	11.3%	41.1%	0.0%	39.1%	2.6%	57,780
Williamson	0.3%	2.2%	13.6%	30.2%	0.2%	50.3%	3.2%	10,135
Wise	4.2%	0.0%	0.0%	26.1%	0.0%	66.2%	3.5%	710
State Eligible Total	0.2%	3.2%	21.2%	41.9%	0.1%	31.8%	1.6%	878,858
State Activity Total	0.1%	0.5%	18.7%	31.6%	0.1%	46.6%	2.3%	2,653

Source: 2010-2014 CHAS, Table 2.

Statewide, White owner households are overrepresented in the HBA and TBRA Programs while Hispanic or Latino owner households are underrepresented. Of Texas owner households that are experiencing one or more severe housing problem, 31.8% identify as White and 41.9% as Hispanic or Latino. However, of HBA and TBRA participant households, 46.6% identify as White and 31.6% as Hispanic or Latino. Note that small percentages of differences could still denote a disproportional service if the percentage of population served is proportionally smaller than the percentage of such group in the population, while a large percent difference may not constitute a disproportional service in small populations. In programs or geographic areas with few people, it may not be possible to draw clear inferences or comparisons.

Of individual counties with more than 30 HBA or TBRA participant households, Ector County has the largest underrepresentation among racial and ethnic categories. While 53.0% of Ector County owner households that are experiencing one or more severe housing problem identify as Hispanic or Latino, only 16.4% of Ector County TBRA participant households identify as Hispanic or Latino. However, the actual number of households served in the county is small and small differences can make major differences in percentage of race served. Ector County did not have any HBA activity in SFY 2013 - 2017. Of individual counties with more than 30 HBA or TBRA participant households, Nacogdoches County has the largest overrepresentation among racial and ethnic categories of any individual county with more than 30 HBA or TBRA participant households. While 27.7% of Nacogdoches County owner households that are experiencing one or more severe housing problem identify as Black or African American, 63.5% of Nacogdoches County TBRA participant households identify as Black or African American. Nacogdoches County also did not have any HBA activity in SFY 2013 - 2017.

**CFD and HRA**

TDHCA helps colonia residents to convert their contracts for deed into traditional mortgages, while also helping households to rehabilitate their home or replace their manufactured housing unit. Overall, these two programs assisted over 1,100 households between 2013 and 2017.

**Figure 6-3: SFY 2013 - 2017 Percent of HOME Program CFD and HRA Activity Participant Households in Counties with 30 or more CFD or HRA Participant Households by Race and Ethnicity**

County	Activity Group	American Indian/Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/Other Pacific Islander	White	Other or Multiple Race/Ethnicity	Total Households
Cameron	HRA	0.0%	0.0%	0.0%	94.4%	0.0%	2.8%	2.8%	108
Cass	HRA	0.0%	0.0%	63.5%	5.8%	0.0%	30.8%	0.0%	52
El Paso	CFD	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	33
El Paso	HRA	0.0%	0.0%	0.0%	96.8%	0.0%	3.2%	0.0%	31
Hale	HRA	0.0%	0.0%	3.3%	93.3%	0.0%	3.3%	0.0%	30
Red River	HRA	0.0%	0.0%	45.9%	5.4%	0.0%	48.6%	0.0%	37
San Patricio	HRA	0.0%	0.0%	0.0%	93.9%	0.0%	6.1%	0.0%	49
State Activity Total	HRA/CFD	0.1%	0.0%	25.4%	50.4%	0.0%	23.1%	1.0%	1,116

Source: TDHCA Central Database, SFY 2013-2017.

**Figure 6-4: Percent of Income Eligible Texas Owner Households Experiencing One or More Severe Housing Problems in Counties with 30 or More CFD or HRA Participant Households by Race and Ethnicity**

County	American Indian/Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/Other Pacific Islander	White	Other or Multiple Race/Ethnicity	Total Households
Cameron	0.0%	0.1%	1.1%	90.8%	0.0%	7.9%	0.0%	11,030
Cass	0.0%	0.0%	14.6%	1.6%	2.4%	78.0%	3.3%	615
El Paso	0.2%	0.8%	1.8%	88.1%	0.1%	8.5%	0.5%	18,294
Hale	0.0%	0.0%	0.7%	67.1%	0.0%	27.0%	5.2%	574
Red River	0.0%	0.0%	10.0%	1.3%	0.0%	88.6%	0.0%	299
San Patricio	0.0%	2.1%	1.3%	46.3%	0.0%	49.2%	1.3%	1,200
State Eligible Total	0.3%	3.7%	10.7%	43.1%	0.1%	41.1%	1.1%	543,662
State Activity Total	0.1%	0.0%	25.4%	50.4%	0.0%	23.1%	1.0%	1,116

Source: 2010-2014 CHAS, Table 2.

Statewide, White owner households are the most underrepresented in the HRA and CFD Programs while Black or African American owner households are the most overrepresented followed by Hispanic or Latino households. While 41.1% of income eligible owner households in Texas experiencing one or more severe housing problems identify as White, only 23.1% of HRA and CFD participant households identified as White. 10.7% of income eligible owner households in Texas experiencing one or more severe housing problems identify as Black or African American and 43.1% as Hispanic or Latino, but 25.4% of HRA and CFD participant households identify as Black or African American and 50.4% as Hispanic or Latino.

Of individual counties with more than 30 HRA or CFD participant households, Cass County has both the largest individual underrepresentation and overrepresentation among racial and ethnic categories. 78.0% of income eligible Cass County households with one or more severe housing problems identify as White compared to 30.8% of HRA participant households. 14.6% of income eligible Cass County households with one or more severe housing problems identify as Black or African American compared to 63.5% of HRA participant households.

## Texas Bootstrap Loan Program

The Texas Bootstrap Loan (Bootstrap) Program provides loans to eligible applicants that participate in self-help housing programs overseen by state-certified nonprofit owner-builder housing providers. Known as the Owner-Builder Loan Program in Tex. Government Code §2306.751, the Texas Bootstrap Loan Program promotes and enhances homeownership for Texans with an income of less than or equal to 60% AMFI by providing funds to purchase or refinance real property on which to build new residential housing, construct new residential housing, or improve existing residential housing through sweat-equity. Eligible applicants must

agree to provide at least 65% of the labor necessary to build or rehabilitate the proposed housing. This program is funded through the State Housing Trust Fund (SHTF). At least two-thirds of Texas Bootstrap loans each fiscal year must be made to borrowers whose property is in a census tract that has a median household income that is not greater than 75% of the median state household income.

Figure 6-5 and Figure 6-6 compare the ethnicity and race of SFY 2013 - 2017 Bootstrap Program participant households to income eligible Texas households experiencing one or more severe housing problems. The Bootstrap Program records and reports the race and ethnicity of program participant households together. Hispanic or Latino is considered a racial/ethnic category alongside White, Black or African American, Asian, etc. This matches the way CHAS data group race and ethnicity together, making direct comparison straightforward. While households with incomes at or below 60% AMFI are eligible for the Bootstrap Program, due to data availability households at or below 80% AMFI will be used as the eligibility measure for comparison. County-level data are only shown for counties with at least 30 program participants. The state total includes all program participants.

**Figure 6-5: SFY 2013 - 2017 Percent of Bootstrap Program Participant Households in Counties with 30 or more Participants in the Bootstrap Program by Race and Ethnicity**

County	American Indian/ Alaskan Native	Asian or Native Hawaiian/ Other Pacific Islander	Black or African American	Hispanic or Latino	White	Other or Multiple Race/ Ethnicity	Unknown Race/ Ethnicity	Total Households
Bexar	0.0%	5.1%	11.1%	79.5%	1.7%	0.0%	2.6%	117
Collin	0.0%	3.3%	53.3%	33.3%	6.7%	0.0%	3.3%	30
El Paso	0.0%	0.0%	0.0%	81.6%	15.8%	0.0%	2.6%	38
Tarrant	1.1%	20.7%	35.6%	31.0%	8.0%	1.1%	2.3%	87
Travis	2.1%	2.1%	23.4%	59.6%	10.6%	0.0%	2.1%	47
Webb	0.0%	0.0%	0.0%	47.2%	47.2%	0.0%	5.6%	36
State Activity Total	1.0%	5.8%	20.6%	55.5%	12.0%	4.3%	0.8%	515

Source: TDHCA MITAS Database, SFY 2013-2017.



**Figure 6-6: Percent of Income Eligible Texas Households Experiencing One or More Severe Housing Problems in Counties with 30 or More Bootstrap Program Participants by Race and Ethnicity**

County	American Indian/ Alaskan Native	Asian or Native Hawaiian/ Other Pacific Islander	Black or African American	Hispanic or Latino	White	Other or Multiple Race/ Ethnicity	Total Households
Bexar	0.3%	2.2%	9.8%	61.3%	24.9%	1.5%	96,905
Collin	0.4%	8.6%	11.8%	18.7%	57.6%	3.0%	33,040
El Paso	0.3%	1.0%	2.9%	85.2%	9.6%	0.9%	42,334
Tarrant	0.3%	4.8%	22.6%	29.9%	40.8%	1.7%	106,469
Travis	0.1%	5.6%	10.5%	39.4%	42.0%	2.4%	79,490
Webb	0.1%	0.1%	0.0%	96.9%	2.9%	0.0%	16,883
State Eligible Total	0.3%	3.5%	17.3%	42.3%	35.0%	1.5%	1,423,725
State Activity Total	1.0%	5.8%	20.6%	55.5%	12.0%	4.3%	515

Source: 2010-2014 CHAS, Table 2.

Statewide, White households are underrepresented while Hispanic or Latino households are overrepresented in Bootstrap Program participant households. While 35.0% of income eligible Texas households experiencing one or more severe housing problems identify as White, only 12.0% of Bootstrap Program participant households identify as White; a difference of 23.0%. At the state level, White is the only underrepresented category. However, race and ethnicity are not reported separately for the program; for instance, White Hispanic households who identify themselves as Hispanic may not identify themselves by their race, resulting in a possible undercounting of White households.

## My First Texas Home Program

The My First Texas Home (MFTH) Program offers competitive interest rate mortgage loans and down payment assistance for qualified individuals and families whose gross annual household income does not exceed 115% AMFI or 140% of AMFI if in a targeted area. The MFTH Program is offered on a first-come, first-served basis through a network of participating lenders to households purchasing their first home or those who have not owned a home in the past three years. The purchase price of the home must not exceed stipulated maximum purchase price limits. A minimum of 30% of program funds are made available to assist Texans earning 80% or less of program income limits.

The Texas Mortgage Credit Certificate (TX MCC) Program may be combined with the MFTH Program; however, borrowers under either funding source must continue to meet the more restrictive eligibility requirements of the TX MCC Program.

Figure 6-7 and Figure 6-8 compare the ethnicity and race of SFY 2013 - 2017 MFTH Program participant households to Texas renter households experiencing one or more severe housing problems. The MFTH Program records and reports the race and ethnicity of program participant households together. Hispanic or Latino is considered a racial/ethnic category alongside White,

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Black or African American, Asian, etc. This matches the way CHAS data group race and ethnicity together, making direct comparison straightforward. County-level data are only shown for counties with at least 30 program participants. The state total includes all program participants. 2,447 MFTH Program loans were combined with TDHCA TX MCC Program assistance and are included in both MFTH Program and TX MCC Program figures.

**Figure 6-7: SFY 2013 - 2017 Percent of MFTH Program Participant Households in Counties with 30 or more Participants in the MFTH Program by Race and Ethnicity**

County	American Indian/ Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/ Other Pacific Islander	White	Other or Multiple Race/ Ethnicity	Unknown Race/ Ethnicity	Total Households
Bell	0.0%	0.9%	15.2%	33.9%	0.0%	50.0%	0.0%	0.0%	112
Bexar	0.1%	1.2%	7.3%	69.0%	0.1%	21.4%	0.8%	0.1%	976
Brazoria	0.0%	2.4%	32.3%	32.3%	0.0%	30.7%	1.6%	0.8%	127
Cameron	0.0%	0.0%	0.8%	93.2%	0.0%	6.1%	0.0%	0.0%	132
Collin	0.0%	2.1%	16.0%	32.5%	0.0%	47.4%	1.5%	0.5%	194
Comal	0.0%	0.0%	1.9%	33.3%	0.0%	64.8%	0.0%	0.0%	54
Dallas	0.0%	1.3%	31.1%	40.5%	0.0%	26.0%	0.8%	0.3%	605
Denton	0.5%	3.5%	20.8%	24.3%	0.0%	49.5%	1.0%	0.5%	202
El Paso	0.0%	0.1%	0.8%	94.3%	0.0%	4.5%	0.3%	0.0%	1,498
Ellis	0.0%	0.0%	26.0%	32.9%	0.0%	41.1%	0.0%	0.0%	73
Fort Bend	0.2%	1.5%	37.8%	37.3%	0.5%	20.1%	2.0%	0.5%	407
Galveston	0.0%	0.8%	21.3%	34.4%	0.8%	42.6%	0.0%	0.0%	122
Grayson	0.0%	0.0%	4.9%	17.1%	0.0%	73.2%	2.4%	2.4%	41
Guadalupe	0.0%	0.0%	4.8%	49.2%	0.0%	46.0%	0.0%	0.0%	63
Harris	0.2%	2.1%	25.1%	48.4%	0.3%	20.7%	3.1%	0.1%	2,730
Hays	0.0%	2.4%	5.3%	54.4%	0.0%	36.7%	1.2%	0.0%	169
Hidalgo	0.5%	0.5%	0.9%	90.8%	0.5%	6.9%	0.0%	0.0%	217
Jefferson	0.0%	5.6%	50.0%	5.6%	0.0%	38.9%	0.0%	0.0%	36
Johnson	0.0%	0.0%	3.0%	21.2%	0.0%	75.8%	0.0%	0.0%	66
Kaufman	0.0%	3.0%	23.9%	38.8%	3.0%	29.9%	0.0%	1.5%	67
Lubbock	0.0%	0.0%	1.9%	55.6%	0.0%	42.6%	0.0%	0.0%	54
McLennan	0.0%	0.0%	10.8%	21.6%	0.0%	64.9%	2.7%	0.0%	37
Montgomery	0.0%	1.0%	14.2%	25.9%	0.3%	56.3%	2.3%	0.0%	309
Nueces	1.4%	0.0%	2.9%	62.3%	0.0%	31.9%	1.4%	0.0%	69
Tarrant	0.1%	1.8%	23.1%	29.9%	0.0%	43.0%	1.8%	0.3%	783
Travis	0.0%	3.3%	17.4%	41.0%	0.4%	36.8%	1.1%	0.0%	459
Webb	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	68
Williamson	0.0%	2.5%	14.6%	30.1%	0.3%	51.9%	0.6%	0.0%	322
State Activity Total	0.1%	1.4%	16.5%	52.3%	0.2%	27.8%	1.5%	0.2%	10,479

Source: TDHCA Homeownership Data, SFY 2013-2017.

**Figure 6-8: Percent of Texas Renter Households Experiencing One or More Severe Housing Problems in Counties with 30 or More MFTH Program Participants by Race and Ethnicity**

County	American Indian/ Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/ Other Pacific Islander	White	Other or Multiple Race/ Ethnicity	Total Households
Bell	0.9%	2.0%	35.0%	18.3%	1.8%	38.7%	3.5%	9,680
Bexar	0.2%	2.2%	11.5%	60.1%	0.1%	24.2%	1.6%	70,460
Brazoria	0.4%	1.9%	19.6%	34.7%	0.0%	41.8%	1.6%	7,495
Cameron	0.1%	0.3%	0.3%	93.2%	0.0%	5.9%	0.1%	15,085
Collin	0.2%	9.2%	14.8%	21.6%	0.1%	50.6%	3.4%	21,270
Comal	0.0%	0.0%	2.8%	37.0%	0.0%	58.0%	2.5%	2,855
Dallas	0.3%	4.6%	32.3%	39.7%	0.0%	21.2%	2.0%	125,915
Denton	0.2%	6.4%	17.1%	21.7%	0.1%	51.9%	2.6%	22,400
El Paso	0.4%	1.1%	4.0%	82.3%	0.1%	11.1%	1.1%	26,770
Ellis	0.0%	0.6%	20.0%	37.8%	0.0%	40.2%	1.5%	4,075
Fort Bend	0.0%	12.9%	28.2%	33.4%	0.0%	24.6%	0.8%	10,955
Galveston	0.0%	3.8%	31.9%	25.1%	0.0%	37.5%	1.7%	10,050
Grayson	2.8%	0.5%	13.1%	11.5%	0.0%	71.1%	1.3%	3,600
Guadalupe	0.0%	0.6%	9.0%	55.4%	0.0%	32.9%	2.3%	2,435
Harris	0.2%	4.3%	29.7%	45.0%	0.1%	19.6%	1.1%	194,730
Hays	0.0%	1.3%	3.4%	39.5%	0.2%	52.3%	3.4%	8,310
Hidalgo	0.0%	0.4%	0.5%	94.6%	0.0%	4.5%	0.0%	27,530
Jefferson	0.2%	4.3%	51.6%	11.9%	0.3%	30.3%	1.4%	9,610
Johnson	0.0%	1.5%	4.1%	30.5%	0.3%	63.0%	0.3%	2,915
Kaufman	0.0%	0.0%	25.9%	33.0%	0.0%	40.6%	1.1%	2,180
Lubbock	0.3%	2.3%	9.3%	31.8%	0.1%	54.1%	2.1%	14,605
McLennan	0.1%	1.6%	27.7%	18.8%	0.0%	50.8%	1.0%	11,105
Montgomery	0.1%	3.2%	9.2%	23.9%	0.3%	61.1%	2.1%	11,500
Nueces	0.0%	1.2%	5.0%	64.8%	0.0%	27.8%	1.2%	13,875
Tarrant	0.3%	4.4%	27.6%	29.0%	0.2%	36.7%	1.8%	73,390
Travis	0.1%	6.0%	10.8%	41.3%	0.0%	39.2%	2.6%	62,190
Webb	0.0%	0.1%	0.0%	98.4%	0.0%	1.5%	0.0%	11,350
Williamson	0.3%	2.5%	13.1%	29.8%	0.2%	51.1%	2.9%	10,875
State Eligible Total	0.2%	3.5%	20.4%	42.1%	0.1%	32.1%	1.6%	958,589
State Activity Total	0.1%	1.4%	16.5%	52.3%	0.2%	27.8%	1.5%	10,479

Source: 2010-2014 CHAS, Table 2.

Statewide, White households are underrepresented and Hispanic or Latino households are overrepresented in MFTH Program participant households. However, race and ethnicity are not

reported separately for the program; for instance, White Hispanic households who identify themselves as Hispanic may not identify themselves by their race, resulting in a possible undercounting of White households.

Data limitations notwithstanding, 32.1% of Texas households experiencing one or more severe housing problems identify as White and 42.1% identify as Hispanic or Latino, however, 27.8% of MFTH Program participant households identify as White and 52.3% identify as Hispanic or Latino. Black or African American households are also underrepresented, with 20.4% of Texas renter households identifying as Black or African American but 16.5% of MFTH Program participant households identifying as Black or African American. The differences between the percent of households experiencing one or more severe housing problems and the percent of participant households are less than 1.0% for American Indian/Alaskan Native, Native Hawaiian/Other Pacific Islander, and Other Race/Ethnicity. Asian households are slightly underrepresented with 3.5% of Texas households identifying as Asian but only 1.4% of program participant households.

## **Texas Mortgage Credit Certificate Program**

The Texas Mortgage Credit Certificate Program (TX MCC) provides a tax credit of 40% of annual interest paid on a mortgage loan up to \$2,000 annually that reduces the borrower's federal income tax liability. Similar to the MFTH Program, the TX MCC Program is offered through a network of participating lenders. The TX MCC Program provides homeownership opportunities for qualified households whose gross annual household income does not exceed 115% AMFI or 140% AMFI if in a targeted area. In order to participate in the TX MCC Program, homebuyers must meet certain eligibility requirements and obtain a mortgage loan through a participating lender.

The TX MCC Program may be combined with the MFTH Program; however, borrowers under either funding source must continue to meet the more restrictive eligibility requirements of the TX MCC Program.

Figure 6-9 and Figure 6-10 compare the ethnicity and race of SFY 2013 - 2017 TX MCC Program participant households to Texas renter households experiencing one or more severe housing problems. The TX MCC Program records and reports the race and ethnicity of program participant households together. Hispanic or Latino is considered a racial/ethnic category alongside White, Black or African American, Asian, etc. This matches the way CHAS data group race and ethnicity together, making direct comparison straightforward. County-level data are only shown for counties with at least 30 program participants. The state total includes all program participants. 2,447 TX MCC Program Mortgage Credit Certificates were combined with MFTH Program loans and are included in both MFTH Program and TX MCC figures.

**Figure 6-9: SFY 2013 - 2017 Percent of TX MCC Program Participant Households in Counties with 30 or more Participants in the TX MCC Program by Race and Ethnicity**

County	American Indian/ Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/ Other Pacific Islander	White	Other or Multiple Race/ Ethnicity	Unknown Race/ Ethnicity	Total Households
Bastrop	0.0%	1.4%	8.5%	32.4%	0.0%	47.9%	5.6%	4.2%	71
Bell	0.0%	0.0%	22.9%	31.4%	0.0%	37.1%	5.7%	2.9%	70
Bexar	0.1%	1.6%	6.9%	61.6%	0.1%	21.0%	3.2%	5.5%	692
Brazoria	0.0%	4.1%	21.6%	33.0%	1.0%	15.5%	4.1%	20.6%	97
Caldwell	0.0%	0.0%	4.4%	31.1%	0.0%	53.3%	2.2%	8.9%	45
Cameron	0.0%	0.0%	3.3%	93.3%	0.0%	3.3%	0.0%	0.0%	30
Collin	0.0%	1.3%	14.8%	21.9%	0.0%	34.2%	9.0%	18.7%	155
Dallas	0.0%	2.3%	28.1%	44.5%	0.0%	18.2%	2.9%	4.1%	488
Denton	0.0%	3.6%	16.0%	19.5%	0.0%	44.4%	3.6%	13.0%	169
El Paso	0.0%	0.0%	0.9%	93.7%	0.0%	4.7%	0.2%	0.4%	446
Ellis	0.0%	2.1%	31.9%	12.8%	0.0%	51.1%	2.1%	0.0%	47
Fort Bend	0.2%	10.1%	27.5%	31.9%	0.2%	16.0%	5.4%	8.6%	407
Galveston	0.0%	3.8%	13.2%	27.4%	1.9%	40.6%	2.8%	10.4%	106
Grayson	0.0%	0.0%	5.0%	10.0%	0.0%	82.5%	2.5%	0.0%	40
Guadalupe	0.0%	6.3%	10.4%	39.6%	0.0%	41.7%	0.0%	2.1%	48
Harris	0.2%	3.9%	18.3%	52.5%	0.1%	12.5%	4.2%	8.2%	2,440
Hays	0.2%	1.0%	4.4%	44.3%	0.0%	34.7%	4.7%	10.8%	594
Hidalgo	0.0%	0.0%	1.4%	84.1%	0.0%	13.0%	1.4%	0.0%	69
Kaufman	0.0%	2.0%	26.0%	34.0%	0.0%	36.0%	0.0%	2.0%	50
Montgomery	0.0%	3.1%	6.2%	26.1%	0.0%	47.8%	4.3%	12.4%	161
Nueces	0.0%	3.6%	0.0%	62.5%	0.0%	30.4%	0.0%	3.6%	56
Rockwall	0.0%	3.0%	6.1%	27.3%	0.0%	51.5%	0.0%	12.1%	33
Tarrant	0.0%	8.8%	18.7%	22.5%	0.0%	37.3%	4.7%	7.9%	466
Travis	0.1%	5.3%	10.0%	31.6%	0.1%	37.2%	5.1%	10.6%	1,577
Williamson	0.2%	3.4%	9.9%	27.4%	0.0%	44.4%	5.2%	9.6%	888
State Activity Total	0.1%	3.6%	13.2%	42.5%	0.1%	28.3%	4.1%	8.0%	9,728

Source: TDHCA Homeownership Database, SFY 2013-2017.

**Figure 6-10: Percent of Texas Renter Households Experiencing One or More Severe Housing Problems in Counties with 30 or More TX MCC Program Participants by Race and Ethnicity**

County	American Indian/ Alaskan Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian/ Other Pacific Islander	White	Other or Multiple Race/ Ethnicity	Total Households
Bastrop	0.0%	0.0%	9.4%	49.6%	0.0%	41.0%	0.0%	1,220
Bell	0.9%	2.0%	35.0%	18.3%	1.8%	38.7%	3.5%	9,680
Bexar	0.2%	2.2%	11.5%	60.1%	0.1%	24.2%	1.6%	70,460
Brazoria	0.4%	1.9%	19.6%	34.7%	0.0%	41.8%	1.6%	7,495
Caldwell	0.0%	0.0%	10.4%	48.9%	0.0%	41.1%	0.0%	960
Cameron	0.1%	0.3%	0.3%	93.2%	0.0%	5.9%	0.1%	15,085
Collin	0.2%	9.2%	14.8%	21.6%	0.1%	50.6%	3.4%	21,270
Dallas	0.3%	4.6%	32.3%	39.7%	0.0%	21.2%	2.0%	125,915
Denton	0.2%	6.4%	17.1%	21.7%	0.1%	51.9%	2.6%	22,400
El Paso	0.4%	1.1%	4.0%	82.3%	0.1%	11.1%	1.1%	26,770
Ellis	0.0%	0.6%	20.0%	37.8%	0.0%	40.2%	1.5%	4,075
Fort Bend	0.0%	12.9%	28.2%	33.4%	0.0%	24.6%	0.8%	10,955
Galveston	0.0%	3.8%	31.9%	25.1%	0.0%	37.5%	1.7%	10,050
Grayson	2.8%	0.5%	13.1%	11.5%	0.0%	71.1%	1.3%	3,600
Guadalupe	0.0%	0.6%	9.0%	55.4%	0.0%	32.9%	2.3%	2,435
Harris	0.2%	4.3%	29.7%	45.0%	0.1%	19.6%	1.1%	194,730
Hays	0.0%	1.3%	3.4%	39.5%	0.2%	52.3%	3.4%	8,310
Hidalgo	0.0%	0.4%	0.5%	94.6%	0.0%	4.5%	0.0%	27,530
Kaufman	0.0%	0.0%	25.9%	33.0%	0.0%	40.6%	1.1%	2,180
Montgomery	0.1%	3.2%	9.2%	23.9%	0.3%	61.1%	2.1%	11,500
Nueces	0.0%	1.2%	5.0%	64.8%	0.0%	27.8%	1.2%	13,875
Rockwall	0.0%	1.4%	7.2%	25.9%	0.0%	63.1%	2.0%	1,450
Tarrant	0.3%	4.4%	27.6%	29.0%	0.2%	36.7%	1.8%	73,390
Travis	0.1%	6.0%	10.8%	41.3%	0.0%	39.2%	2.6%	62,190
Williamson	0.3%	2.5%	13.1%	29.8%	0.2%	51.1%	2.9%	10,875
State Eligible Total	0.2%	3.5%	20.4%	42.1%	0.1%	32.1%	1.6%	958,589
State Activity Total	0.1%	3.6%	13.2%	42.5%	0.1%	28.3%	4.1%	8.0%

Source: 2010-2014 CHAS, Table 2.

The racial and ethnic proportions of Texas households experiencing one or more severe housing problems are relatively closely aligned at the statewide level with the racial and ethnic makeup of TX MCC Program participant households. Black or African American and White households are both slightly underrepresented, with a difference between the percent of households experiencing one or more severe housing problems and the percent of participant households of 7.2% and 3.8% respectively. Other Race/Ethnicity is slightly overrepresented as 1.6% of state

households identify as Other Race/Ethnicity compared to 4.1% of program participant households. The percent of TX MCC Program participant households identifying as American Indian/Alaskan Native, Asian, Hispanic or Latino, and Native Hawaiian/Other Pacific Islander households are all within 1% of the percent of statewide renter households identifying as those races and ethnicities.

The most significant discrepancy between county demographics and county participant households is the underrepresentation of White households in Brazoria County, where 41.8% of households experiencing one or more severe housing problems identify as White but only 15.5% of program participant households identify as White. Ellis County has the second largest underrepresentation with 37.8% of County households experiencing one or more severe housing problems identifying as Hispanic or Latino but only 12.8% of program participant households identifying as Hispanic or Latino. The largest overrepresentation is in Bell County, where 18.3% of households experiencing one or more severe housing problems identify as Hispanic or Latino compared to 31.4% of program participant households.

## **Multifamily Programs**

TDHCA's Multifamily Finance Division funds the construction of affordable rental housing through the Housing Tax Credit (HTC) Program, Multifamily Bond (MF Bond) Program, and Multifamily Direct Loan (MFDL) Program.

The HTC Program provides tax credits to nonprofit or for-profit developers which are in turn sold in order to generate equity and allow property owners to lease units at reduced rents. The targeted beneficiaries of the program are households with incomes at or below 80% AMFI (60% at the time of the data collection). There are two different HTC programs: the 9% competitive HTC Program and the 4% non-competitive HTC Program.

Through the MF Bond Program, TDHCA issues tax-exempt and taxable multifamily bonds to provide loans for the development of affordable rental housing to nonprofit and for-profit developers who assist Texans with incomes at or below 60% AMFI.

Through the MFDL Program, TDHCA awards HOME, Tax Credit Assistance Program Repayment Funds (TCAP RF), Neighborhood Stabilization Program Round 1 Program Income (NSP1 PI) as available, and National Housing Trust Fund (NHTF) funds to eligible applicants for the development of affordable rental housing. Owners are required to make the units available to households at or below 80% AMFI and must meet long-term rent restrictions as defined by HUD.

The Multifamily Finance Division programs are frequently layered or have received funding at different points in time (for example a property may have a tax credit allocation from 2006 and a direct loan from 2009). Due to this layering, where possible Multifamily Finance Division programs will be combined and analysis will be based on all active multifamily properties still participating in TDHCA Multifamily Finance Division programs, which we consider the multifamily portfolio. Over time, other Department programs and fund sources have been used to finance multifamily properties, which are also part of the Department's multifamily portfolio and this analysis.

## Racial and Ethnic Comparison

Properties in TDHCA’s multifamily portfolio report race and ethnicity separately for each individual in a resident household. Because data are recorded for each individual, this portfolio data will be compared to the U.S. Census Bureau’s American Community Survey (ACS) data, which provide data at the individual level, as opposed to HUD’s CHAS data. ACS data separate race and ethnicity, so multifamily portfolio resident data will be listed by race and by ethnicity separately. Note that race and ethnicity data are self-reported.

Figure 6-11 compares the ethnicity of all reported individuals residing in active properties in the multifamily portfolio as of May 2017 to individuals whose income in the past 12 months, according to Census ACS estimates, was lower than 200% of the poverty level. Figure 6-11 also compares the race of all reported individuals residing in active properties in the multifamily portfolio as of May 2017 to individuals whose income in the past 12 months was lower than 200% of the poverty level. Individuals at or below 200% of the poverty level will likely qualify for a majority of the housing assistance options offered through TDHCA’s HOME, HTC, and SHTF programs. County-level data are only shown for counties with at least 30 multifamily portfolio residents. 73 of Texas’ 254 counties had fewer than 30 multifamily portfolio residents; 60 of those counties had zero participants. The state total includes all multifamily portfolio residents.

**Figure 6-11: Percent of 2017 Individual Residents in Active Multifamily Properties Participating in TDHCA Programs and Texas Individuals at or Below 200% Poverty in Counties with 30 or more Individual Renters in Active Multifamily Properties Participating in TDHCA Programs by Ethnicity**

	<b>TDHCA MF Portfolio</b>	<b>State Eligible Total</b>
Hispanic or Latino	39.8%	55.3%
Not Hispanic or Latino	51.6%	45.3%
Unreported Ethnicity	8.6%	-
American Indian/ Alaskan Native	0.4%	0.4%
Asian	1.6%	2.9%
Black or African American	33.4%	14.2%
Native Hawaiian/ Other Pacific Islander	0.4%	0.1%
White	49.2%	71.1%
Other Race	5.2%	8.9%
Multiple Races	0.9%	2.4%
Unreported Race	8.7%	-
<b>Total Individuals</b>	<b>476,039</b>	<b>9,804,978</b>

Source: TDHCA Central Database, May 2017; 2011-2015 ACS Selected Population Tables, Table C17002.

Statewide, Hispanic or Latino individuals are underrepresented in the multifamily portfolio. While 55.3% of statewide individuals at or below 200% poverty identify as Hispanic or Latino, 39.8% of multifamily portfolio residents identify as such.



Individuals living in multifamily properties have the option to indicate their race and ethnicity on in-take forms; this information is not required. The largest underrepresentation not due to lack of ethnic data is in Titus County, where 56.3% of individuals at or below 200% poverty identify as Hispanic or Latino compared to 11.0% of multifamily portfolio residents. The largest overrepresentation of Hispanic or Latino individuals is in Schleicher County, where 50.6% of individuals at or below 200% poverty identify as Hispanic or Latino compared to 82.5% of multifamily portfolio residents.

The differences between individuals at or below 200% poverty and multifamily program participants identifying as American Indian/ Alaskan Native, Asian, Multiple Races, and Native Hawaiian/ Other Pacific Islander are all less than 2%. Individuals identifying as Other Race make up 8.9% of statewide individuals at or below 200% poverty compared to 5.2% of multifamily portfolio residents, a difference of just 3.7%. White individuals are underrepresented (71.1% of individuals at or below 200% poverty compared to 49.7% of multifamily portfolio residents) statewide while Black or African American individuals are overrepresented (14.2% of individuals at or below 200% poverty compared to 33.4% of multifamily portfolio residents).

Several counties have a difference between the percent of individuals at or below 200% poverty and the percent of multifamily portfolio residents identifying as Black or African American of greater than 45%: Bowie County (35.7% vs. 82.2%), Falls County (31.4% vs. 81.9%), Houston County (38.8% vs. 91.0%), Jasper County (25.8% vs. 89.6%), Madison County (14.0% vs. 68.4%), Marion County (34.0% versus 95.8%), San Augustine County (29.0% vs. 86.1%), and Waller County (29.1% vs. 74.1%). Black or African American individuals are overrepresented in the multifamily portfolio in these counties, the majority of which are in East Texas (TDHCA State Service Regions 4, 5, and 6). Multifamily portfolio properties may not deny households with housing vouchers (such as vouchers from the HCV Program), solely based on their participation in a housing voucher program. In Texas and across the country, Black or African American households have particularly high participation rates in the HCV Program. This may explain some of the overrepresentation of Black or African American residents in the multifamily portfolio. It should be noted that this prohibition against denying voucher-holding households helps to mitigate the difficulty to find housing among voucher holders.

Crockett County is the only county with a greater than 45% difference overrepresentation of any race other than Black or African American. 41.7% of individuals at or below 200% poverty identify as White while 95.5% of multifamily portfolio residents in Crockett County identify as White.

Several counties have a difference between the percent of individuals at or below 200% poverty and the percent of multifamily portfolio residents identifying as White of greater than 45%: Falls County (64.4% vs. 16.7%), Grimes County (69.1% vs. 16.1%), Harrison County (60.7% vs. 7.7%), Houston County (49.1% vs. 4.1%), Jasper County (74.2% vs. 8.8%), Madison County (80.1% vs. 28.1%), Marion County (66.0% vs. 2.1%), Nacogdoches County (69.8% vs. 20.6%), and San Augustine County (71.0% vs. 13.9%). White individuals are severely underrepresented in the multifamily portfolio in these areas, the majority of which are in East Texas (TDHCA State Service Regions 4, 5, and 6). Several other counties (DeWitt, Franklin, Refugio, and Ward counties) have large overrepresentations of White individuals in the multifamily portfolio; however, those

counties have a large number of multifamily portfolio residents with unreported race which may skew the data.

Crockett County and Gonzalez County are the only counties with a greater than 45% difference underrepresentation of any race other than White in the multifamily portfolio. 58.3% of individuals at or below 200% poverty identify as Some Other Race while 0.0% of multifamily portfolio residents in Crockett County identify as Some Other Race. 46.2% of individuals at or below 200% poverty identify as Some Other Race while only 0.8% of multifamily portfolio residents in Gonzalez County identify as Some Other Race.

### HTC Income Categories

In the HTC Program, properties are required to identify at application the number of units that they will make available for different income categories of tenants; the incomes of the households who occupy those units must be at or below the income category selected (for example, a unit identified by a property to be a 60% AMFI unit, must be occupied by someone with an income no greater than the 60% AMFI limit, but may actually be occupied by a household with an income closer to 30% AMFI). Figure 6-12 shows the state totals for both the percentage and number of HTC Program-assisted units designated for households in particular income categories compared to the incomes of Texas renter households for ease of comparison. All active HTC Program-assisted units as of March 2019 are included in the data. None of the HTC Program assisted units are set aside for households with incomes over 60% AMFI. However, in order to match CHAS income categories, units with rents between 50% and 60% AMFI have been combined with units with rents 60% to 80% AMFI. Note that the multifamily total unit counts are based on the set aside totals, not actual count of all units.

**Figure 6-12: Percent and Count of Units in Active Multifamily Properties Participating in the HTC Program by Rent Set-Aside Category and Texas Renter Households in Counties with Active Multifamily Properties Participating in the HTC Program by Income Category**

	ELI	VLI	LI	MI	Greater than 100 Percent AMFI	Total
Percent of Units in Active MF Properties	3.5%	17.2%	70.8%	0.0%	0.0%	100.0%
Total Set-Aside Units in Active MF Properties	6,915	37,302	159,529	0	0	231,010
Percent of Renter Households	22.6%	17.5%	20.9%	10.0%	29.0%	100.0%
Total Renter Households	755,745	585,035	697,110	334,578	967,920	3,340,370

Source: TDHCA Central Database, March 2019. 2010-2014 CHAS, Table 8.

Statewide, there are proportionally more HTC Program-assisted units set aside for LI households than there are renter households in that income category. While 20.9% of Texas renter households have incomes in this category, 70.8% of HTC Program-assisted units are set aside for households in that the same income category. Because there are no HTC Program-assisted units

set aside for households with incomes above 60% AMFI, this overrepresentation is limited to units set aside for households with incomes between 50% and 60% AMFI. It should be noted that income categories listed for HTC Program-assisted units are maximum incomes and it is not uncommon for households that would qualify as ELI, VLI, or LI to occupy a unit at a level higher than the income category for which they would be classified; for instance, a VLI household may occupy a unit set aside for LI households. This may result in these households having a greater housing burden than would be expected if they were able to be housed in an appropriately classified unit. In the future, under the income averaging method newly authorized by the Internal Revenue Service households with less than or equal to 80% AMFI will be eligible to live in HTC units, so there will be units in HTC Program-assisted properties set aside for households with incomes greater than 60% but less than or equal to 80% AMFI. Because there are currently no HTC Program-assisted units set aside for households with incomes greater than 60% AMFI, households with incomes greater than 80% AMFI are underrepresented. However, the HTC Program is not currently meant to benefit this demographic.

While 22.6% of Texas renter households are ELI, only 305% of HTC Program-assisted units are set aside for households within this AMFI category. The percent of Texas renter households that are VLI is relatively close to the percent of HTC Program-assisted units set aside for households in this AMFI category (17.5% of renter households compared to 17.2% of HTC Program-assisted units).

There are a limited number of ELI units available because of the long-term operating costs associated with operating these units. Based on operating costs from all parts of the state of Texas, the average annual operating expense before debt service for a multifamily development on a per unit basis is higher than the maximum gross rent able to be charged for a unit set aside for households with an income less than or equal to 30% AMFI. This means that even if the unit was built with 100% grant funds (i.e. no debt), to house an ELI household requires an ongoing source of subsidy. When a property uses profits generated from units that are set aside for households with higher incomes or market rate units to subsidize those lower income units, the net income capacity of the whole development is challenged which can affect their ability to obtain debt and thereby lead to insufficient funds to develop, acquire, or build the development. Even where public housing is converted to tax credit housing, for example, and sufficient non-repayable funds are available to build or acquire the housing (i.e. no outstanding debt to complete the project), ELI restricted rent units must still be offset with higher rent level units to ensure the property can break even; alternatively ongoing rental subsidy must be available to pay the higher rents and sustain the ongoing operation of a property.

Four counties have a severe underrepresentation of units set aside for ELI households. San Augustine County, Willacy County, Zapata County, and Zavala County all have more than a 45% difference between the percent of units set aside for ELI households and the percent of renter households in the same income category. San Augustine and Zavala counties both have zero HTC Program-assisted units set aside for ELI households. Three of these four counties are located in the border region, TDHCA State Service Region 11.

Kinney County has the most pronounced overrepresentation among all categories, with 5.0% of renter households in the LI category but 100% of units set aside for households in this category.

Kinney County also has the largest underrepresentation for the VLI category, with 27.5% of households in this income category but zero HTC Program-assisted units set aside. Kinney County is one of two counties with a more than 25% difference between the percent of renter households and percent of units set aside for households in this income category, the other being Childress County (which has 91.3% of its units set aside for LI households).

**Property Type**

Figure 6-13 presents the percentage of program units in the multifamily portfolio as of May 2017 by the type of population served, based on property type within the multifamily portfolio as of May 2017. Program units are units within multifamily properties participating in TDHCA programs that are set at a certain level of affordability as a requirement for program participation. Property type outlines any restrictions or preferences associated with multifamily properties participating in TDHCA programs. For ease of analysis, the elderly category includes the Elderly Only, Elderly Preference, and Elderly Limitation property types. The Disability category includes Disability Only, Transitional Only, and Supportive Housing property types. Note that the Disability Only properties were approved at a time when properties serving only persons with disabilities was permitted; that is no longer the case.

Figure 6-14 presents the percent of total units in the multifamily portfolio by property type as of May 2017. These figures include market rate units in addition to program units in multifamily portfolio properties.

**Figure 6-13: Percent of Program Units in Active Multifamily Properties Participating in TDHCA Programs by Property Type**

	Individual/ Family	Elderly	Inter- generational	Disability <sup>31</sup>	Total Program Units
Total Program Units	77.8%	21.4%	0.47%	0.4%	218,883

Source: TDHCA Central Database, May 2017.

**Figure 6-14: Percent of Total Units in Active Multifamily Properties Participating in TDHCA Programs by Property Type**

	Individual/ Family	Elderly	Inter- generational	Disability <sup>1</sup>	Total Units
Total Units	78%	21.3%	0.44%	0.4%	232,917

Source: TDHCA Central Database, May 2017.

The majority of units in multifamily portfolio properties are in Individual/ Family properties, which are general population properties. 77.8% of program units and 78% of total units are

<sup>31</sup> “Disability” units refer to units that are designated for persons with disabilities only. Funding developments serving only persons with disabilities is no longer an eligible activity at the Department. The units in the TDHCA portfolio that are in this count were built and funded prior to that activity becoming ineligible. Similarly, intergenerational properties are no longer an eligible activity; those properties currently designated as intergenerational housing are being converted to a different property type during each property’s next compliance visit.

Individual/ Family, while the next largest category is Elderly. Elderly properties amount to 21.3% of program units and of total units. Note, general population properties have no age restrictions of tenants; elderly persons are able to live at these properties. Elderly properties have age restrictions that may prevent some families with children, a protected class, from living at the property. This is an exemption to the FHA allowed under the Housing for Older Persons Act (HOPA). The remaining 0.87% of program units and 0.84% of total units are split between Intergenerational and Disability.

**Accessibility and Tenant Special Needs**

Figure 6-15 presents the percent of accessible units in active multifamily properties participating in TDHCA programs by the type of accessibility modification reported by the properties. Units may be made accessible for sensory disabilities, such as vision or hearing impairment, or mobility disabilities. Figure 6-16 provides the disability status of actual tenants residing in active multifamily properties participating in TDHCA programs. While

Figure 6-15 presents data at the household or unit level, Figure 6-16 presents data at the individual or occupant level.

**Figure 6-15: Percent of Accessible Units in Active Multifamily Properties Participating in TDHCA Programs by Accessibility Type**

	Mobility Accessibility	Sensory Accessibility	Not Equipped	Total Units	Total Accessible Units
Accessible Units	7.2%	2.1%	90.7%	244,902	22,816

Source: TDHCA Central Database, August 2018.

**Figure 6-16: Percent of Tenants in Active Multifamily Properties Participating in TDHCA Programs by Presence of Disability**

	Tenant with Disability	Tenant without Disability	Tenant did not Respond	Total
Tenants	11.5%	82.7%	5.8%	476,039

Source: TDHCA Central Database, May 2017.

11.5% of tenants in multifamily portfolio properties report having a disability, while only 9.3% of units were reported as accessible for persons with disabilities. This may suggest that there is a greater need for accessible units; however, not all tenants with a disability require physical modification for accessibility. It is also possible that properties report only those units originally designed as accessible in their figure of accessible units, and may not include units for which they may have made tenant-requested modifications. These figures do not include tenants that did not report their disability status, which could increase or decrease these discrepancies.

Note that the total unit count is based only on those properties that have reported accessibility information. The tenant count is based on the multifamily portfolio as of May 2017.

## Housing Opportunities for Persons with AIDS (HOPWA)

The Texas Department of State Health Services (DSHS) administers the Housing Opportunities for Persons with AIDS (HOPWA) Program. DSHS receives funding for the HOPWA Program from HUD for projects that benefit low-income persons living with HIV and their families.

This section compares the percent of 2017 HOPWA Program participants (Figure 6-17) to the percent of persons living with HIV (Figure 6-18) by race and ethnicity. HOPWA Program participant data are from DSHS Project Sponsors, the local administrators of the HOPWA Program. 2016 Texas HIV Epidemiologic Profile (EPI) is used for data on Persons Living with HIV (PLWH) as the 2017 EPI is not yet available. For reporting purposes, race and ethnicity have been combined in Figure 6-17 and Figure 6-18. HOPWA Program participants who identified as Hispanic or Latino are reported as Hispanic or Latino in the EPI profile, regardless of other available racial data. Only HIV Service Delivery Areas with more than 30 HOPWA Program participants are included in the analysis. The counties included in each of the HIV Service Delivery Areas are listed at the end of this section.

Note that program participant percentages may be different from demographics for PLWH, but they only represent relatively small numbers. Percentages in the following tables may not add to 100 percent due to rounding.

**Figure 6-17: Percent of 2017 HOPWA Program Participants by Race/Ethnicity in DSHS HOPWA Service Areas**

HIV Service Delivery Area	Total	White	Black	Hispanic/Latino	Other	Unknown
Abilene	89	36.0%	37.0%	27.0%	0.0%	0.0%
Amarillo	64	25.0%	27.0%	41.0%	8.0%	0.0%
Beaumont-Port Arthur	50	20.0%	76.0%	2.0%	2.0%	0.0%
Brownsville-Harlingen	293	3.0%	0.0%	96.0%	0.0%	0.0%
Corpus Christi	129	33.0%	11.0%	56.0%	0.0%	0.0%
El Paso	37	5.0%	3.0%	81.0%	11.0%	0.0%
Lubbock	51	18.0%	43.0%	39.0%	0.0%	0.0%
Midland-Odessa	34	21.0%	32.0%	47.0%	0.0%	0.0%
Nacogdoches-Lufkin	81	35.0%	36.0%	30.0%	0.0%	0.0%
San Antonio	183	13.0%	35.0%	50.0%	3.0%	0.0%
Sherman-Denison	66	73.0%	23.0%	5.0%	0.0%	0.0%
Tyler-Longview	216	29.0%	64.0%	7.0%	0.0%	0.0%
State Total	1,493	23.0%	31.0%	46.0%	1.0%	0.0%

Source: 2017 Texas HOPWA Program Progress Report data for the Department of State Health Services (DSHS) (From DSHS's project sponsors). Percentages may not add to 100 percent due to rounding.

**Figure 6-18: Percent of Persons Living with HIV by Race/Ethnicity in DSHS HOPWA Service Areas**

HIV Service Delivery Area	Total	White	Black	Hispanic/Latino	Other	Unknown
Abilene	369	56.1%	20.9%	18.4%	0.8%	3.8%
Amarillo	516	46.1%	14.5%	32.6%	4.1%	2.7%
Beaumont-Port Arthur	1,092	27.3%	51.1%	10.2%	0.6%	10.8%
Brownsville-Harlingen	2,096	6.4%	1.2%	91.3%	0.2%	0.8%
Corpus Christi	847	25.3%	6.8%	61.9%	0.2%	5.8%
El Paso	2,082	7.0%	5.1%	86.9%	0.2%	0.8%
Lubbock	579	36.3%	16.4%	42.1%	0.3%	4.8%
Midland-Odessa	536	32.8%	16.2%	45.1%	1.7%	4.1%
Nacogdoches-Lufkin	624	34.9%	48.6%	9.5%	1.1%	5.9%
San Antonio	6,600	21.9%	14.7%	59.7%	0.8%	2.9%
Sherman-Denison	235	66.0%	14.9%	11.9%	2.1%	5.1%
Tyler-Longview	1,546	40.4%	44.6%	11.4%	0.1%	3.5%
<b>Total</b>	<b>82,462</b>	<b>26.6%</b>	<b>37.1%</b>	<b>31.8%</b>	<b>1.2%</b>	<b>3.3%</b>

Source: 2016 Texas HIV Epidemiologic Profile data from the Department of State Health Services (DSHS) (retrieved from <https://www.dshs.texas.gov/hivstd/epiprofile/>). Percentages may not add to 100 percent due to rounding.

Patterns of underrepresentation and overrepresentation can be observed when comparing the percentage of HOPWA Program participants and their expected counts to the percentage and expected counts of PLWH in a given racial category. For this comparison, a 20% percent difference between the two percentages is considered major. The Service Delivery Areas with some underrepresentation among White program participants when compared to White PLWH are Abilene and Amarillo. However, if evaluated in ratios, 36% to 56% and 25% to 46% is a smaller portfolio ratio than some of the ratios in other service areas. No major overrepresentation of White PLWH among program participants is noted in the Service Delivery Areas.

The Service Delivery Areas with the largest overrepresentation among Black program participants compared to Black PLWH are Lubbock, Beaumont-Port Arthur, and San Antonio. No major underrepresentation of Black PLWH among program participants is noted in the Service Delivery Areas. The one Service Delivery Area with a major overrepresentation among Hispanic or Latino program participants compared to Hispanic or Latino PLWH is Nacogdoches-Lufkin. No major underrepresentation of Hispanic or Latino PLWH among program participants is noted in the Service Delivery Areas.

No major over- or underrepresentation can be noted for persons identified as Other. Only a small number of persons fall under Some Other Race; small changes in the number of program participants can result in a significant difference between percent of program participants and percent of PLWH. Since every HOPWA Program participant’s race and ethnicity is reported, no comparison is made between program participants and PLWH identified as Unknown race in the 2016 EPI. In Beaumont-Port Arthur, race and ethnicity are not known for more than 10 percent of PLWH. Knowing the race and ethnicity of that population would have allowed for a more complete picture of over- or underrepresentation of all Service Delivery Areas.

It is also noted that most Service Delivery Areas do not have a large number of HOPWA Program participants; even 10 to 15 additional program participants in any race or ethnicity category would have significantly changed the percentages.

Figure 6-19 details the counties found in each of the HIV Service Delivery Areas used in the analysis found in this section.

**Figure 6-19: Counties Included in DSHS HIV Service Delivery Areas That are Included in the Analysis**

<b>HIV Service Delivery Area</b>	<b>Counties</b>
Abilene	Brown, Callahan, Coleman, Comanche, Eastland, Fisher, Haskell, Jones, Kent, Knox, Mitchell, Nolan, Runnels, Scurry, Shackelford, Stephens, Stonewall, Taylor, Throckmorton
Amarillo	Armstrong, Briscoe, Carson, Castro, Childress, Collingsworth, Dallam, Deaf Smith, Donley, Gray, Hall, Hansford, Hartley, Hemphill, Hutchinson, Lipscomb, Moore, Ochiltree, Oldham, Parmer, Potter, Randall, Roberts, Sherman, Swisher, Wheeler
Beaumont-Port Arthur	Hardin, Jefferson, Orange
Brownsville-Harlingen	Cameron, Hidalgo, Willacy
Corpus Christi	Aransas, Bee, Brooks, Duval, Jim Wells, Kenedy, Kleberg, Live Oak, McMullen, Nueces, Refugio, San Patricio
El Paso	Brewster, Culberson, El Paso, Hudspeth, Jeff Davis, Presidio
Lubbock	Bailey, Cochran, Crosby, Dickens, Floyd, Garza, Hale, Hockley, King, Lamb, Lubbock, Lynn, Motley, Terry, Yoakum
Midland-Odessa	Andrews, Borden, Crane, Dawson, Ector, Gaines, Glasscock, Howard, Loving, Martin, Midland, Pecos, Reeves, Terrell, Upton, Ward, Winkler
Nacogdoches-Lufkin	Angelina, Houston, Jasper, Nacogdoches, Newton, Polk, Sabine, San Augustine, San Jacinto, Shelby, Trinity, Tyler
San Antonio	Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, Medina, Wilson
Sherman-Denison	Cooke, Fannin, Grayson
Tyler-Longview	Anderson, Camp, Cherokee, Gregg, Harrison, Henderson, Marion, Panola, Rains, Rusk, Smith, Upshur, Van Zandt, Wood

In conclusion, Texas performs well in serving clients that are proportionately representative of the low income demographics of Texans and/or the demographics of those in the county or region in which they reside.



## Chapter 7 - Lending Analysis

### Introduction

The Fair Housing Act specifically applies to home loan financing across all protected classes. A lack of equal opportunity in lending may result in disparate impact in housing opportunities among the protected classes under the Fair Housing Act. For this purpose, this section analyzes the Home Mortgage Disclosure Act (HMDA) data for the state of Texas for 2016, the latest data available, in order to analyze possible disparities in lending opportunities among protected classes where information is available (HMDA data does have information on the applicants sex, race, and ethnicity, but does not have information on the applicants national origin, religion, familial status, or whether the applicant is a person with a disability). Disparity in terms of access to credit and access to quality credit sources, such as traditional lenders like banks, could result in certain protected classes facing higher barriers to becoming homeowners and accessing lending products. HMDA requires that certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions, gather and submit loan data that can be used to assist in identifying possible discriminatory lending patterns.

### General Loan Data

In 2016, nearly 684,000 loan applications covered under HMDA were filed in Texas for home purchases, with nearly 455,000 of those for primary residences. The data contains enough demographic information for an analysis, however the ability to draw conclusions about the cause or causes of disparity between various categories of applicants is limited.<sup>32</sup> Of the loan applications for primary residences, nearly 283,000 loan applications resulted in the loan being originated by the financial institution. The balance of applications that did not result in a loan origination, shown in Figure 7-1, includes loan applications that were denied which comprise approximately 45,000, or 9.9%, and those that were withdrawn, or were accepted but the applicant chose not to pursue the loan origination. Note that the numbers from table to table do not necessarily add up to the same totals due to missing or incorrectly coded data, differences between the number of loans that listed no co-applicants, or other phenomena.

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<sup>32</sup> The Supreme Court's opinion in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015) (*ICP*), is controlling on the issue of sufficiency of statistical evidence to make a *prima facie* case of disparate impact discrimination under the Fair Housing Act. In *ICP*, the Court adopted a standard that requires the plaintiff identify a particular facially neutral practice, prove a robust causal connection between the identified practice and the claimed disparate impact, and demonstrate that the disparate impact causes a barrier to housing. See *ICP*, 135 S. Ct. at 2523. The data presented in this analysis is not sufficient to satisfy the *ICP* standard, and no practice or policy described in this section is being identified as creating a barrier to fair housing.

**Figure 7-1: Home Loan Applications with or without Originations**

<b>Applications with No Loan Origination</b>	<b>171,795</b>	<b>37.8%</b>
Loans Originated	282,785	62.2%
Total	454,580	100%

Source: Home Mortgage Disclosure Act Data, 2016.

Figure 7-2 shows the analysis of the data based on the sex of the primary applicants. As Figure 7-2 reflects, in Texas, more than two thirds of all primary loan applicants were male. In half of these cases, a female applied as a co-applicant. Of the approximately 455,000 applications analyzed, 5,052 were male applicants with a male co-applicant and 4,833 were female applicants with a female co-applicant. This amounts to approximately 2.1% of the total applications for a home loan. Among female applicants, less than a third listed a male co-applicant. 161,715 male applicants listed a female co-applicant, while 155,514 included no co-applicant. Conversely, 38,114 female applicants listed a male co-applicant while 87,239 were the sole applicant. Only 715 applications lacked information on the sex of the primary applicant and 2,294 lacked data on the co-applicant’s sex. 181 of those cases were missing information on the sex of both primary applicant and co-applicant.

**Figure 7-2: Loan Applications by Sex of Primary Applicant**

<b>Male</b>	<b>323,823</b>	<b>71.2%</b>
Female	130,757	28.8%
Total	454,580	100%

Source: Home Mortgage Disclosure Act Data, 2016.

**Figure 7-3: Loan Applications by Sex of Co-Applicant**

<b>Male</b>	<b>43,166</b>	<b>9.5%</b>
Female	166,548	36.8%
No co-applicant	242,753	53.7%
Total	452,467	100%

Source: Home Mortgage Disclosure Act Data, 2016.

**Figure 7-4: Loan Actions by Sex of Primary Applicant**

	<b>Male</b>	<b>Female</b>	<b>Total</b>
Loan Applications Denied	30,270	14,661	44,931
Percent of Loan Applications Denied	9.3%	11.2%	9.9%
Total Loan Applications	323,823	130,757	454,580

Source: Home Mortgage Disclosure Act Data, 2016.

There is a small disparity in denial rates between male and female primary applicants. Figure 7-4 shows the denial rates and the number of loan applications by sex of the primary applicant.

## Loan Denials

Figure 7-5 lists the reasons for denial by sex. There are no significant differences in reasons for home loan denial. While more than 40% of Texans identify as Hispanic or Latino, Figure 7-6 shows only 23.6% of home loan applicants were Hispanic or Latino.

**Figure 7-5: Primary Reason for Denial by Sex of Primary Applicant<sup>33</sup>**

Reason for Denial	Male	% of denials	Female	% of denials	Total	% of Total
Mortgage insurance denial	21	0.1%	7	0.1%	28	0.1%
Insufficient cash	719	3.9%	343	4.3%	1,062	4.0%
Employment history	751	4.1%	255	3.2%	1,006	3.8%
Unverifiable information	1,105	6.0%	413	5.1%	1,518	5.8%
Other	1,726	9.4%	776	9.6%	2,502	9.5%
Credit application incomplete	1,869	10.2%	705	8.8%	2,574	9.8%
Collateral	2,620	14.3%	1,157	14.4%	3,777	14.3%
Credit history	3,464	18.9%	1,669	20.7%	5,133	19.4%
Debt-to-income ratio	6,061	33.1%	2,731	33.9%	8,792	33.3%
Total	18,336	100%	8,056	100%	26,392	100%

Source: Home Mortgage Disclosure Act Data, 2016.

**Figure 7-6: Loan Applications by Ethnicity of Primary Applicant**

Hispanic or Latino	106,808	23.6%
Not Hispanic or Latino	345,659	76.4%
Total	496,015	100%

Source: Home Mortgage Disclosure Act Data, 2016.

Though Black or African American individuals make up 11.9% of the state population, only 8.4% of loan applicants were Black or African American. As shown in Figure 7-7, applicants for a home mortgage loan in Texas were more likely to be White than the population as a whole. Additionally, applicants were less likely to be Hispanic or Latino than all Texas residents. While nearly 40% of the State is Hispanic or Latino, less than a quarter of all home loan applicants were.

**Figure 7-7: Loan Applications by Race of Primary Applicant**

Race	Texas Hispanic Residents	Texas Non-Hispanic Residents	Hispanic Applicants	Non-Hispanic Applicants	Total Applicants
American Indian or Alaskan Native	0.2%	0.2%	0.3%	0.5%	0.7%
Asian	0.1%	4.3%	0.1%	8.0%	8.1%
Black or African American	0.3%	11.6%	0.2%	8.2%	8.4%
Native Hawaiian or Other Pacific Islander	0.0%	0.1%	0.1%	0.3%	0.4%
White	31.4%	43.4%	22.9%	59.4%	82.3%
Total	38.6%	61.4%	23.6%	76.4%	100.0%

Source: Home Mortgage Disclosure Act Data, 2016 and United States Census Bureau American Community Survey 5 Year Estimates, 2012-2016, Table B03002.

Figure 7-8 shows the primary reasons for denial of a mortgage application by race/ethnicity. In every case, debt-to-income ratio was the most prevalent reason given for the denial of a home

<sup>33</sup> 18,557 loan application denials analyzed did not contain a primary reason for the denial.

## Lending Analysis

loan application. Credit history was the second most often cited reason, except for Asian applicants, for whom credit history was less likely to be the identified cause for loan application denial. Figure 7-9 through Figure 7-12 illustrate these differences in detail.

**Figure 7-8: Percentage of Primary Reasons for Loan Application Denials by Race and Ethnicity**

<b>Reason for Denial</b>	<b>American Indian or Native Alaskan, Non-Hispanic</b>	<b>Asian, Non-Hispanic</b>	<b>Black or African American, Non-Hispanic</b>	<b>Native Hawaiian or Other Pacific Islander, Non-Hispanic</b>	<b>White, Non-Hispanic</b>	<b>Hispanic or Latino of Any Race</b>
Debt-to-income ratio	35.4%	40.2%	37.6%	20.7%	30.6%	34.4%
Employment history	4.4%	5.6%	3.1%	6.1%	3.7%	3.7%
Credit history	15.2%	8.5%	23.6%	17.1%	18.9%	21.7%
Collateral	15.2%	10.0%	10.0%	12.2%	17.4%	12.1%
Insufficient cash	4.4%	4.9%	3.7%	9.8%	3.9%	4.1%
Unverifiable information	5.7%	8.8%	5.1%	8.5%	5.1%	6.3%
Credit application incomplete	10.8%	14.3%	8.4%	14.6%	11.0%	7.0%
Mortgage insurance denied	0.0%	0.0%	0.1%	0.0%	0.1%	0.2%
Other	8.9%	7.8%	8.5%	11.0%	9.4%	10.5%
<b>Total</b>	<b>158</b>	<b>2,032</b>	<b>3,180</b>	<b>82</b>	<b>12,992</b>	<b>7,948</b>

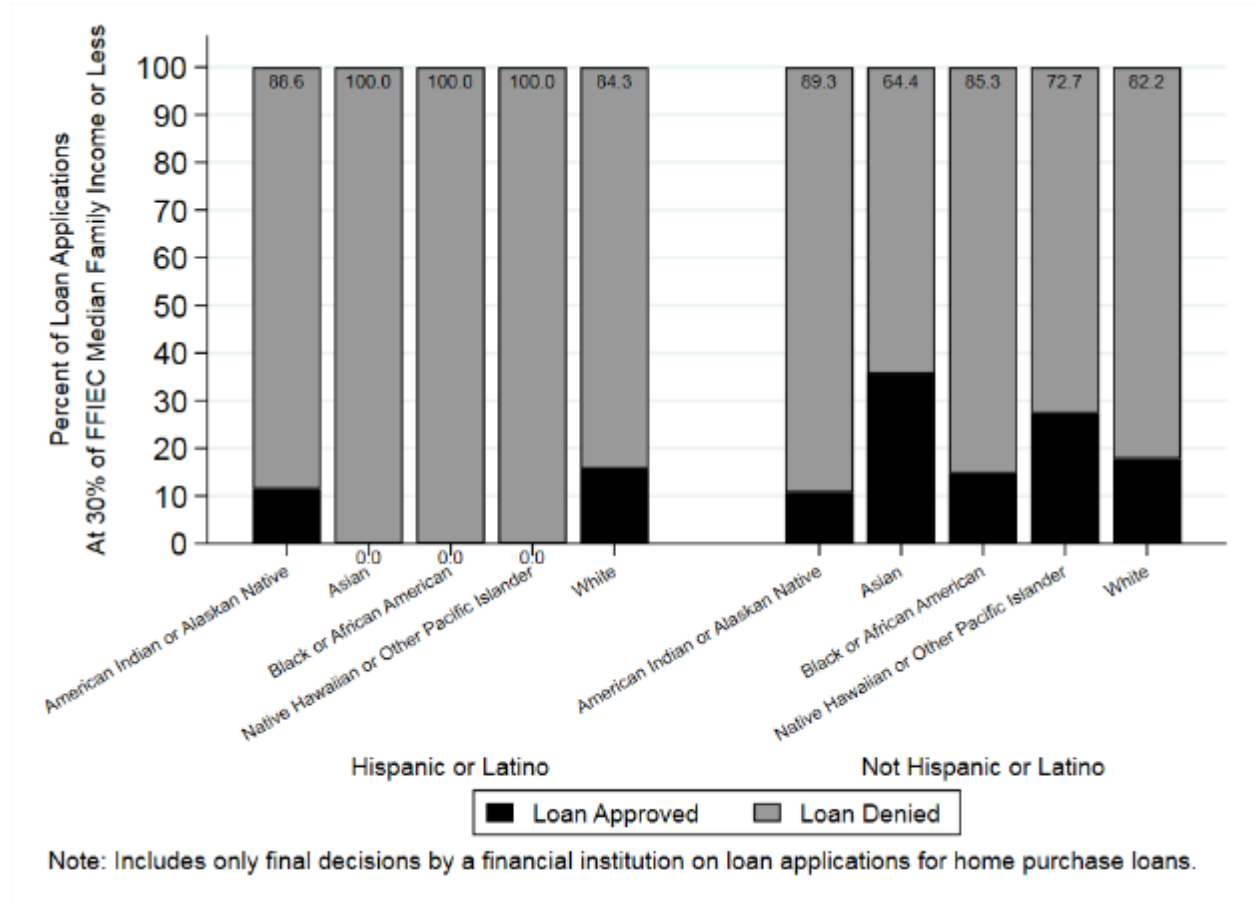
Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

Among White Non-Hispanic loan applicants, debt-to-income ratio and credit history combined accounted for 49% of denials, while among Black or African American Non-Hispanic applicants, those two categories accounted for 61% of denials. Though this might appear to be indicative of a disparity in lending, it cannot be reasonably concluded without further study to control for actual income-to-debt ratio and credit score of the applicants. However, the Consumer Financial Protection Bureau (CFPB), which is the federal entity responsible for disclosing HMDA data to the public, issued final guidance on December 21, 2018, confirming that the credit score relied on in making a credit decision for a loan application will not be included in the publicly disclosed, loan-level data reported by financial institutions.

Figure 7-9 through Figure 7-12 show loan application denials by race and ethnicity while controlling for income. Income in the following tables is based upon the Federal Financial Institutions Examinations Council's ("FFIEC") calculations of the local area's median family income. The FFIEC is responsible for determining uniform methods and measures for the examination of financial institutions, such as those covered under HMDA.

**Figure 7-9: Loan Denial Rates at 30% of the Federal Financial Institutions Examination Council (“FFIEC”) Median Family Income or Less**

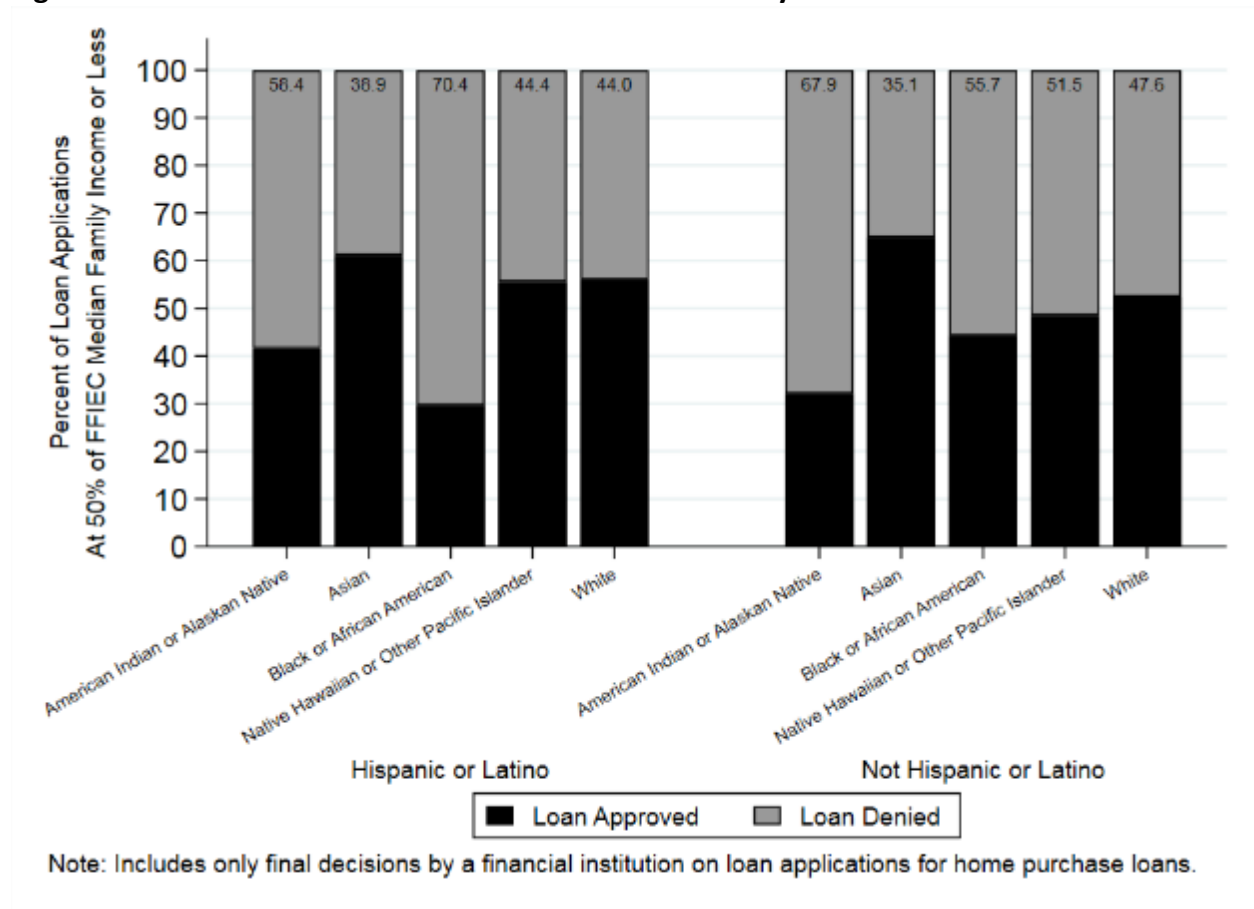


Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

## Lending Analysis

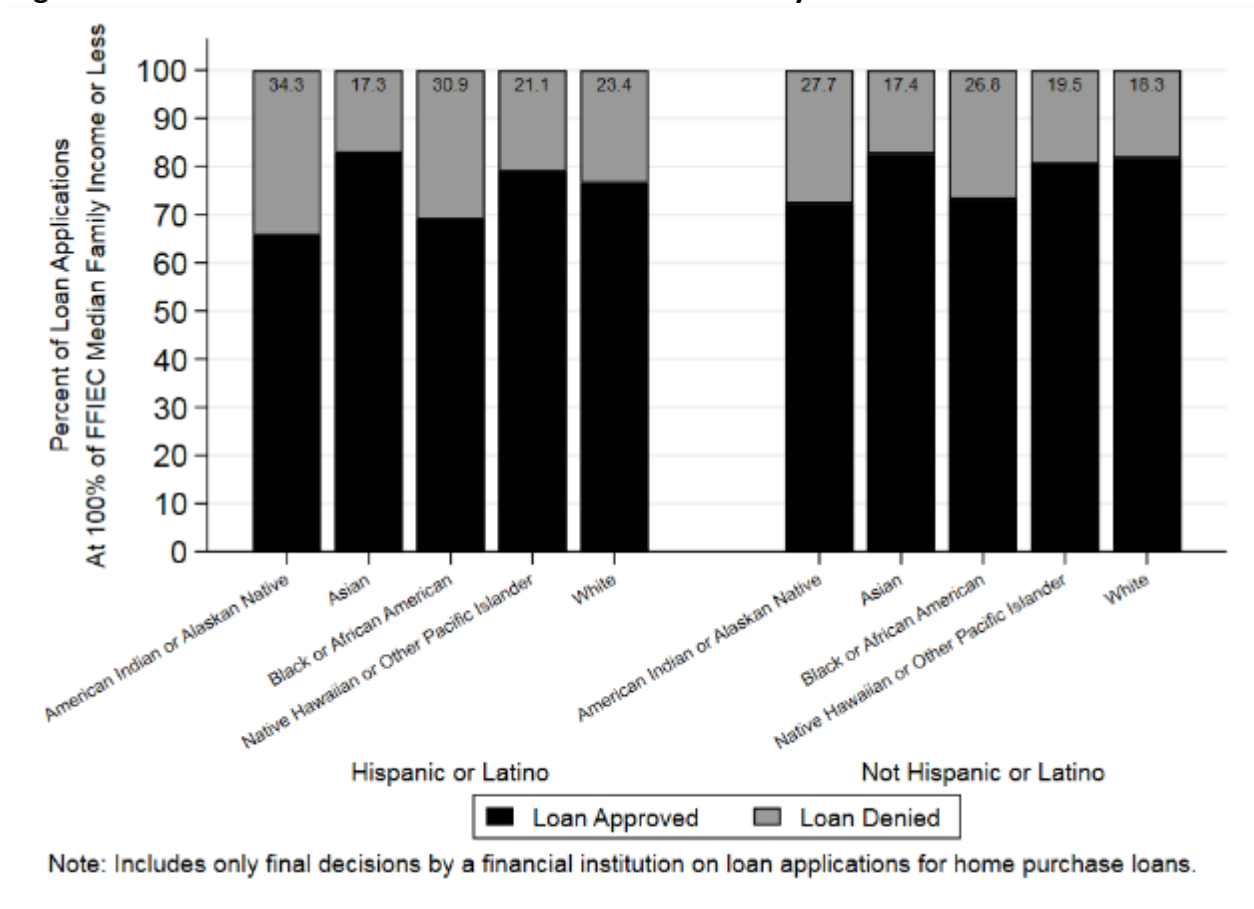
**Figure 7-10: Loan Denial Rates at 50% FFIEC Median Family Income or Less**



Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

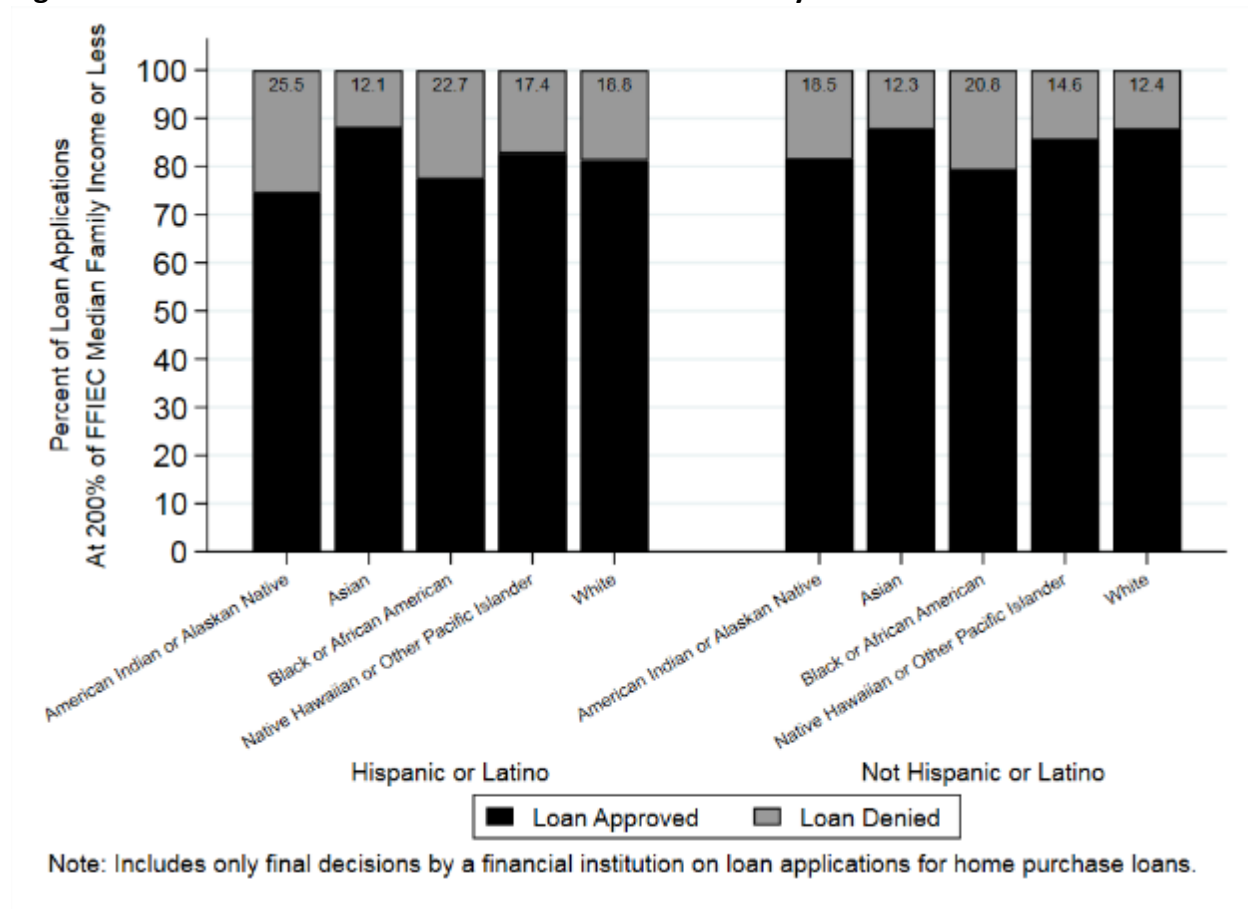
Figure 7-11: Loan Denial Rates at 100% FFIEC Median Family Income or Less



Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

Figure 7-12: Loan Denial Rates at 200% FFIEC Median Family Income or Less



Source: Home Mortgage Disclosure Act Data, 2016.

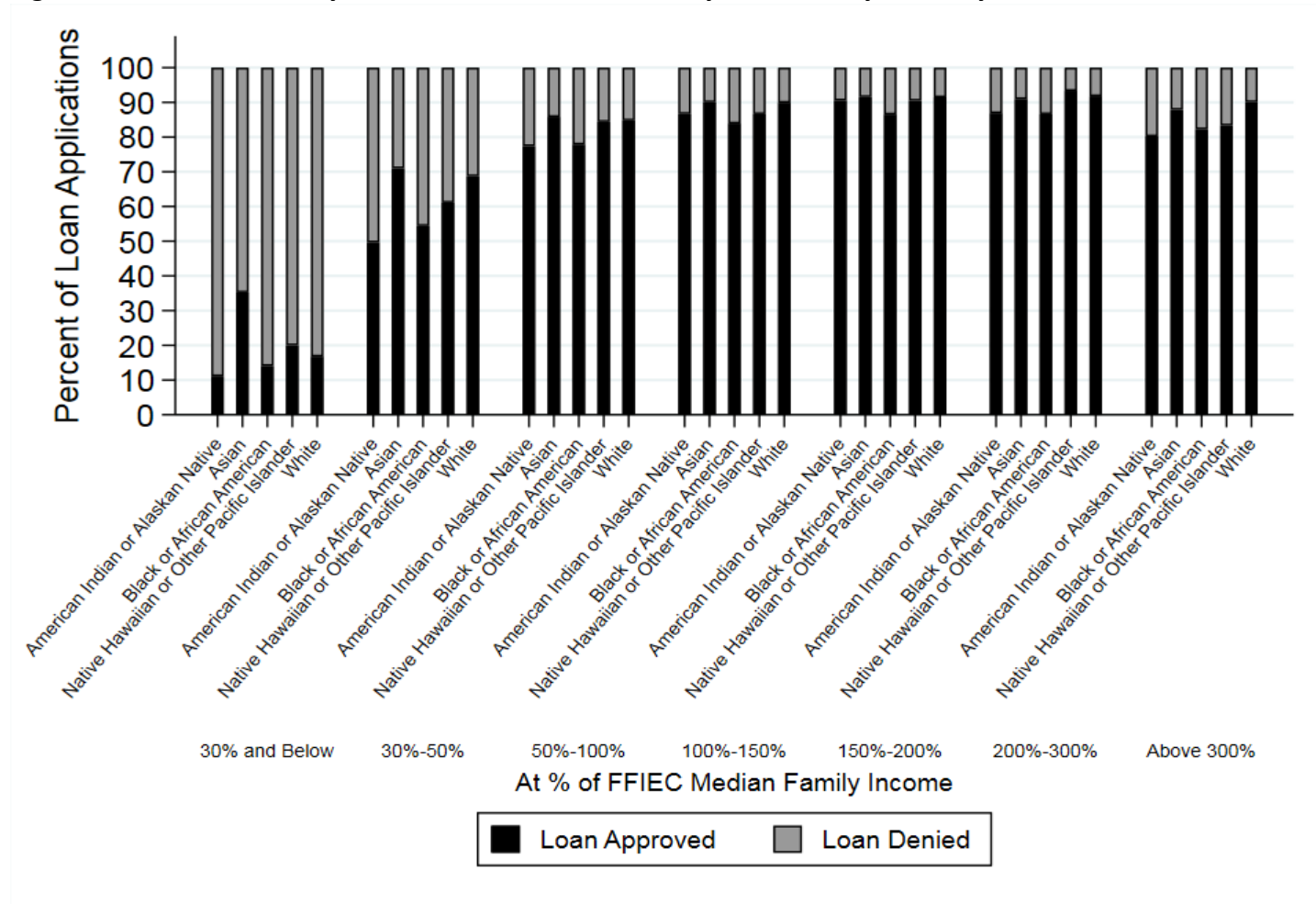
Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

When attempting to control more strictly for income, Figure 7-13 shows that even when applicants make 300% or more of the FFIEC Median Family Income, African American applicants are denied loans at a statistically significant higher rate than White and Asian applicants. The 300% of FFIEC Median Family Income level varies between \$90,000 and \$210,000 for MSAs in Texas. For the complete breakdown of approvals and denials by race, ethnicity, and income groupings, see Figure 7-14.



Lending Analysis

Figure 7-13: Loan Action by Race and FFIEC Median Family Income, Any Ethnicity



Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

Lending Analysis

**Figure 7-14: Loan Action by Race and FFIEC Median Family Income Bracket, Any Ethnicity**

<b>Income Bracket (Percent of FFIEC Median Family Income)</b>	<b>Race</b>	<b>Percent of Loans that Were Denied</b>	<b>Total Loan Applications</b>
30% and Below	American Indian or Alaskan Native	89.0%	82
30% and Below	Asian	68.3%	202
30% and Below	Black or African American	89.4%	649
30% and Below	Native Hawaiian or Other Pacific Islander	83.3%	18
30% and Below	White	84.5%	5,141
31%-50%	American Indian or Alaskan Native	51.5%	163
31%-50%	Asian	30.4%	869
31%-50%	Black or African American	51.4%	1,439
31%-50%	Native Hawaiian or Other Pacific Islander	42.0%	69
31%-50%	White	33.2%	12,159
51%-100%	American Indian or Alaskan Native	24.4%	848
51%-100%	Asian	14.5%	5,851
51%-100%	Black or African American	24.1%	10,651
51%-100%	Native Hawaiian or Other Pacific Islander	16.0%	424
51%-100%	White	16.0%	81,471
101%-150%	American Indian or Alaskan Native	14.4%	682
101%-150%	Asian	10.2%	6,659
101%-150%	Black or African American	16.9%	8,319
101%-150%	Native Hawaiian or Other Pacific Islander	13.5%	379
101%-150%	White	10.5%	71,818
151%-200%	American Indian or Alaskan Native	10.6%	405
151%-200%	Asian	8.5%	5,274
151%-200%	Black or African American	14.2%	4,395
151%-200%	Native Hawaiian or Other Pacific Islander	9.4%	233
151%-200%	White	8.8%	44,972
201%-300%	American Indian or Alaskan Native	13.1%	268
201%-300%	Asian	9.2%	4,414
201%-300%	Black or African American	14.1%	2,678
201%-300%	Native Hawaiian or Other Pacific Islander	7.0%	171
201%-300%	White	8.4%	37,244
Above 300%	American Indian or Alaskan Native	23.2%	112
Above 300%	Asian	12.4%	2,869
Above 300%	Black or African American	18.1%	1,142
Above 300%	Native Hawaiian or Other Pacific Islander	16.5%	79
Above 300%	White	10.1%	24,474

Source: Home Mortgage Disclosure Act Data, 2016.

## Loan Actions by TDHCA Service Region

Disparities in rates of loan application denials are also evident by national origin and are analyzed here regionally. Applicants who identified as being Hispanic or Latino appear to have higher loan denial rates than their Non-Hispanic peers, and the loan denial rates vary geographically within Texas. Figure 7-15 through Figure 7-27 demonstrate this variation in greater detail across all thirteen of TDHCA’s service regions.

**Figure 7-15: Loan Actions by Race and Ethnicity, TDHCA Service Region 1 High Plains**

Applicant Ethnicity	Primary Applicant Race	Loans Approved	Loans Denied	Denial Rate
Hispanic or Latino	American Indian or Alaskan Native	11	12	52.2%
Hispanic or Latino	Asian	3	0	0.0%
Hispanic or Latino	Black or African American	1	0	0.0%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	3	2	40.0%
Hispanic or Latino	White	1,458	309	17.5%
Not Hispanic or Latino	American Indian or Alaskan Native	44	7	13.7%
Not Hispanic or Latino	Asian	166	18	9.8%
Not Hispanic or Latino	Black or African American	126	24	16.0%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	14	5	26.3%
Not Hispanic or Latino	White	5,744	598	9.4%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-16: Loan Actions by Race and Ethnicity, TDHCA Service Region 2 Northwest Texas**

Applicant Ethnicity	Primary Applicant Race	Loans Approved	Loans Denied	Denial Rate
Hispanic or Latino	American Indian or Alaskan Native	8	6	42.9%
Hispanic or Latino	Asian	23	7	23.3%
Hispanic or Latino	Black or African American	2	0	0.0%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	70	12	14.6%
Hispanic or Latino	White	5	2	28.6%
Not Hispanic or Latino	American Indian or Alaskan Native	146	28	16.1%
Not Hispanic or Latino	Asian	5	0	0.0%
Not Hispanic or Latino	Black or African American	13	0	0.0%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	459	153	25.0%
Not Hispanic or Latino	White	3,582	607	14.5%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-17: Loan Actions by Race and Ethnicity, TDHCA Service Region 3 Metroplex**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	143	28	16.4%
Hispanic or Latino	Asian	78	10	11.4%
Hispanic or Latino	Black or African American	139	32	18.7%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	112	21	15.8%
Hispanic or Latino	White	12,847	1,995	13.4%
Not Hispanic or Latino	American Indian or Alaskan Native	480	89	15.6%
Not Hispanic or Latino	Asian	9,988	1,202	10.7%
Not Hispanic or Latino	Black or African American	7,965	1,685	17.5%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	217	35	13.9%
Not Hispanic or Latino	White	59,044	6,058	9.3%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-18: Loan Actions by Race and Ethnicity, TDHCA Service Region 4 Upper East Texas**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	13	15	53.6%
Hispanic or Latino	Asian	1	0	0.0%
Hispanic or Latino	Black or African American	5	6	54.5%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	4	6	60.0%
Hispanic or Latino	White	764	277	26.6%
Not Hispanic or Latino	American Indian or Alaskan Native	50	21	29.6%
Not Hispanic or Latino	Asian	102	33	24.4%
Not Hispanic or Latino	Black or African American	493	407	45.2%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	13	5	27.8%
Not Hispanic or Latino	White	7,101	1,896	21.1%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

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**Figure 7-19: Loan Actions by Race and Ethnicity, TDHCA Service Region 5 Southeast Texas**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	5	1	16.7%
Hispanic or Latino	Asian	1	0	0.0%
Hispanic or Latino	Black or African American	6	3	33.3%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	2	1	33.3%
Hispanic or Latino	White	418	124	22.9%
Not Hispanic or Latino	American Indian or Alaskan Native	32	11	25.6%
Not Hispanic or Latino	Asian	88	19	17.8%
Not Hispanic or Latino	Black or African American	323	216	40.1%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	9	3	25.0%
Not Hispanic or Latino	White	3,888	1,094	22.0%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-20: Loan Actions by Race and Ethnicity, TDHCA Service Region 6 Gulf Coast**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	167	56	25.1%
Hispanic or Latino	Asian	61	11	15.3%
Hispanic or Latino	Black or African American	159	46	22.4%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	164	22	11.8%
Hispanic or Latino	White	15,166	3,030	16.7%
Not Hispanic or Latino	American Indian or Alaskan Native	254	54	17.5%
Not Hispanic or Latino	Asian	7,414	1,099	12.9%
Not Hispanic or Latino	Black or African American	7,673	1,876	19.6%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	187	29	13.4%
Not Hispanic or Latino	White	39,578	4,609	10.4%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-21: Loan Actions by Race and Ethnicity, TDHCA Service Region 7 Capital**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	80	24	23.1%
Hispanic or Latino	Asian	34	3	8.1%
Hispanic or Latino	Black or African American	43	12	21.8%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	35	7	16.7%
Hispanic or Latino	White	4,801	1,171	19.6%
Not Hispanic or Latino	American Indian or Alaskan Native	153	22	12.6%
Not Hispanic or Latino	Asian	2,749	307	10.0%
Not Hispanic or Latino	Black or African American	1,195	284	19.2%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	79	14	15.1%
Not Hispanic or Latino	White	21,359	2,294	9.7%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-22: Loan Actions by Race and Ethnicity, TDHCA Service Region 8 Central Texas**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	26	6	18.8%
Hispanic or Latino	Asian	6	2	25.0%
Hispanic or Latino	Black or African American	34	8	19.0%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	14	1	6.7%
Hispanic or Latino	White	1,545	357	18.8%
Not Hispanic or Latino	American Indian or Alaskan Native	48	22	31.4%
Not Hispanic or Latino	Asian	297	38	11.3%
Not Hispanic or Latino	Black or African American	1,105	334	23.2%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	63	6	8.7%
Not Hispanic or Latino	White	7,974	1,193	13.0%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-23: Loan Actions by Race and Ethnicity, TDHCA Service Region 9 San Antonio**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	116	34	22.7%
Hispanic or Latino	Asian	43	7	14.0%
Hispanic or Latino	Black or African American	81	26	24.3%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	34	8	19.0%
Hispanic or Latino	White	9,866	2,279	18.8%
Not Hispanic or Latino	American Indian or Alaskan Native	123	21	14.6%
Not Hispanic or Latino	Asian	859	119	12.2%
Not Hispanic or Latino	Black or African American	1,867	355	16.0%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	85	11	11.5%
Not Hispanic or Latino	White	15,094	1,918	11.3%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-24: Loan Actions by Race and Ethnicity, TDHCA Service Region 10 Coastal Bend**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	21	8	27.6%
Hispanic or Latino	Asian	3	2	40.0%
Hispanic or Latino	Black or African American	1	3	75.0%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	4	1	20.0%
Hispanic or Latino	White	2,172	576	21.0%
Not Hispanic or Latino	American Indian or Alaskan Native	22	3	12.0%
Not Hispanic or Latino	Asian	143	18	11.2%
Not Hispanic or Latino	Black or African American	138	32	18.8%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	12	0	0.0%
Not Hispanic or Latino	White	3,292	580	15.0%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

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**Figure 7-25: Loan Actions by Race and Ethnicity, TDHCA Service Region 11 South Texas Border**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	15	5	25.0%
Hispanic or Latino	Asian	3	1	25.0%
Hispanic or Latino	Black or African American	6	1	14.3%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	8	1	11.1%
Hispanic or Latino	White	6,108	1,375	18.4%
Not Hispanic or Latino	American Indian or Alaskan Native	6	3	33.3%
Not Hispanic or Latino	Asian	91	23	20.2%
Not Hispanic or Latino	Black or African American	59	8	11.9%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	6	1	14.3%
Not Hispanic or Latino	White	953	162	14.5%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

**Figure 7-26: Loan Actions by Race and Ethnicity, TDHCA Service Region 12 West Texas**

<b>Applicant Ethnicity</b>	<b>Primary Applicant Race</b>	<b>Loans Approved</b>	<b>Loans Denied</b>	<b>Denial Rate</b>
Hispanic or Latino	American Indian or Alaskan Native	10	6	37.5%
Hispanic or Latino	Asian	4	0	0.0%
Hispanic or Latino	Black or African American	8	0	0.0%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	9	8	47.1%
Hispanic or Latino	White	1,871	689	26.9%
Not Hispanic or Latino	American Indian or Alaskan Native	17	6	26.1%
Not Hispanic or Latino	Asian	101	11	9.8%
Not Hispanic or Latino	Black or African American	151	38	20.1%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	15	2	11.8%
Not Hispanic or Latino	White	3,562	527	12.9%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.



**Figure 7-27: Loan Actions by Race and Ethnicity, TDHCA Service Region 13 Upper Rio Grande**

Applicant Ethnicity	Primary Applicant Race	Loans Approved	Loans Denied	Denial Rate
Hispanic or Latino	American Indian or Alaskan Native	20	7	25.9%
Hispanic or Latino	Asian	11	0	0.0%
Hispanic or Latino	Black or African American	27	2	6.9%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	4	2	33.3%
Hispanic or Latino	White	5,218	1,043	16.7%
Not Hispanic or Latino	American Indian or Alaskan Native	16	7	30.4%
Not Hispanic or Latino	Asian	97	18	15.7%
Not Hispanic or Latino	Black or African American	258	41	13.7%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	25	1	3.8%
Not Hispanic or Latino	White	1,332	147	9.9%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

## Discussion of Results

While there are regional differences as well as instances where the number of applicants in an identified ethnic category were too low to make statistical comparisons, denial rates were generally higher among Hispanic or Latino-identifying applicants than other groups in almost all cases. This gap appears especially prevalent in the more rural regions of the state, particularly in the Upper Rio Grande Valley along the South Texas Border (Region 11) and West Texas (Region 12). Additionally, the disparity between denial rates between White and Black or African American applicants appears most prevalent in Upper East Texas (Region 4) and Southeast Texas (Region 5).

However, this analysis of HMDA data is insufficient to conclude a causal relationship between race or ethnicity and loan denial rates. The reasons for this are threefold. First, the HMDA data does not contain the actual credit scores or debt to income ratios of the applicants. Second, even if the HMDA data did contain credit scores, the formulae for generating credit scores are considered proprietary. Therefore, even if individual credit scores were known and the resulting analysis showed no clear racial or ethnic differences in the credit scores of those granted versus denied loans on the basis of credit history, there could still be underlying inputs into the credit score algorithm that inherently penalize individuals based upon race or ethnicity. An example of this would be if zip code or census tract demographics of applicants is factored into credit score, it could artificially deflate the credit scores of minorities. Third, though the HMDA data reveals the “primary reasons for loan application denials,” there is no evidence of a particular lender standard for any reason (alone or in combination with other reasons) to deny a loan. This missing information precludes the ability to make causal conclusions about what is responsible for the disparity in loan denials, and whether it could be considered to be discriminatory under the Fair Housing Act. As such, the State of Texas cannot, with any degree of certainty say that lenders are engaging in prohibited practices that present impediments to fair housing choice. However, the State does suggest that greater transparency from lenders and credit agencies in how lending

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decisions are made and how credit scores are derived could shed light on whether latent practices or policies are the cause of a disparity in loan denial rates.

## Chapter 8 - Fair Housing Trends and Complaints

This section of the AI examines fair housing complaint data across the state of Texas and considers trends and legal cases related to the issue. The Texas Fair Housing Act (the “Act”) prohibits discrimination on the basis of race, religion, color, sex, national origin, disability and familial status. The Act mirrors the Federal Fair Housing Act (FFHA). Texas residents who believe that they have experienced a violation of the FFHA or state fair housing laws may contact one or more of the following organizations: HUD’s Office of Fair Housing and Equal Opportunity in Fort Worth (FHEO) or the Texas Workforce Commission Civil Rights Division (TWC-CRD).

### Complaints filed with the State of Texas

While the Texas Workforce Commission (TWC) is responsible for overseeing and providing workforce development services to employers and citizens, it is also the state agency designated to investigate fair housing complaints. The Civil Rights Division provides services for housing discrimination and complaint resolution, as well as conducts fair housing outreach and education to the public. The TWC-CRD maintains a webpage with information on how to file a complaint (<https://twc.texas.gov/partners/how-submit-housing-discrimination-complaint>). The website provides several ways to file a complaint, including through an online form available in English and Spanish, by writing a letter to TWC-CRD, or by calling TWC-CRD directly at 888-452-4778 or 512-463-2642. Those who are deaf, hard-of-hearing, or speech-impaired may contact Relay Texas for assistance at 800-735-2989 (TTY) and 711 (Voice). The website also has a fair housing fact sheet to help potential complainants identify housing discrimination as well as what steps they can expect TWC-CRD to follow after a complaint is filed.

Upon receiving a complaint, TWC-CRD will notify the alleged violator, or respondent, of the complaint and allow that person or organization to submit a response. An assigned TWC-CRD investigator will then proceed to determine if there is reasonable cause to believe the law had been violated. The TWC-CRD will try to reach a conciliation agreement between the complainant and respondent. If such an agreement is reached, there will be no further action unless the conciliation agreement is breached. In that case, TWC-CRD may recommend that the Texas Attorney General file suit.

If TWC-CRD determines after investigation that reasonable cause for discrimination exists, the case will be heard in an administrative hearing, unless either party files an election to have the case heard in state district court.

### Complaints filed with HUD

Housing discrimination complaints may be filed with HUD online (at [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/online-complaint](https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint)) using either an online form available in English or Spanish, or by downloading and emailing or mailing to the local FHEO office a separate form that is available in Arabic, Cambodian, Chinese, Korean, Russian, Somali, Spanish, and Vietnamese. Potential complainants may also file a complaint by calling 800-669-9777 or 800-927-9275 for TTY, or by calling HUD’s regional FHEO office. HUD’s

## Fair Housing Trends and Complaints

Fort Worth Regional Office of FHEO serves Texas residents and may be reached by calling 817-978-5900 or 817-978-5595 for TTY.

When a complaint is received, HUD will notify the person who filed the complaint along with the alleged violator and allow the alleged violator to submit a response. The complaint will then be investigated to determine whether there has been a violation of the FFHA.

A fair housing complaint filed with HUD may be resolved in a number of ways. First, HUD is required to try to reach an agreement between the two parties involved. A conciliation agreement must protect both the complainant and the public interest. If an agreement is approved, HUD will take no further action unless the agreement is breached.

If HUD has determined that a state or local agency has the same housing powers as HUD, referred to as a substantial equivalence, HUD may refer the complaint to that state or local agency and will notify the complainant of the referral. Once a state or local agency is certified as a Substantially Equivalent Agency, HUD will typically refer complaints of housing discrimination that it receives to the certified state or local agency for investigation. The state and local agencies, called Fair Housing Assistance Program (“FHAP”) partners, must begin work on the complaint within 30 days or HUD may take it back. In Texas, TWC is the statewide FHAP in addition to several designated local agencies which include the City of Austin Equal Employment and Fair Housing Office, City of Corpus Christi Department of Human Relations, City of Dallas Fair Housing Office, Fort Worth Human Relations Commission, and the Garland Office of Housing and Neighborhood Services.

If during the investigative, review, and legal process HUD finds that discrimination has occurred, the case will be heard as an administrative hearing within 120 days, unless either party prefers the case to be heard in Federal district court.

### **Local, HUD-Funded Fair Housing Organizations**

HUD provides various grants to organizations that work on fair housing issues. Fair housing organizations and other non-profits that receive funding through the Fair Housing Initiatives Program (FHIP) assist people who believe they have been victims of housing discrimination. FHIP organizations partner with HUD to help people identify government agencies that handle complaints of housing discrimination. They also conduct preliminary investigation of claims, including sending “testers” to properties suspected of practicing housing discrimination. In addition to funding organizations that provide direct assistance to individuals who feel they have been discriminated against while attempting to purchase or rent housing, FHIP also has initiatives that promote fair housing laws and equal housing opportunity awareness. See Figure 8-1 for a listing of FHIP and FHAP agencies in Texas.

**Figure 8-1: HUD Funded FHIP and FHAP Agencies in Texas, 2018**

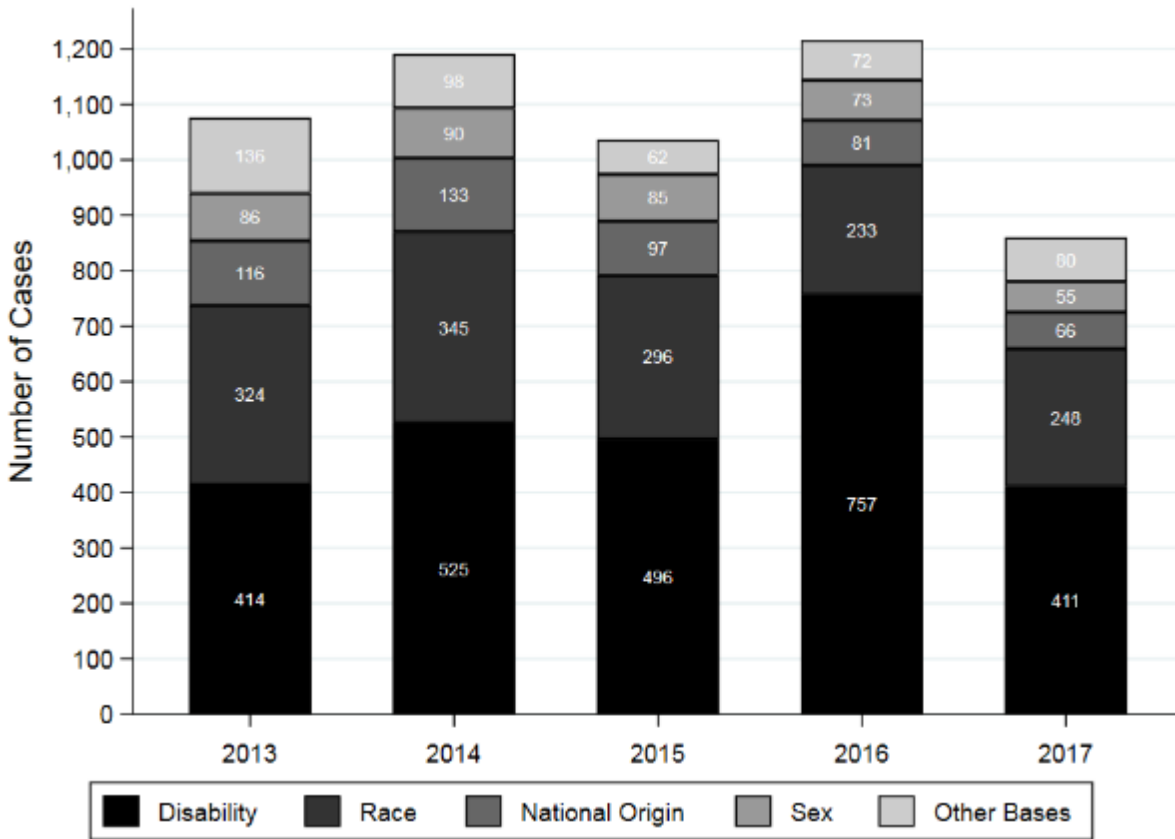
Name	Program	Website	Telephone
City of Austin Equal Employment and Fair Housing Office	FHAP	<a href="http://www.austintexas.gov">www.austintexas.gov</a>	512-974-3262
City of Corpus Christi Department of Human Relations	FHAP	<a href="http://www.cctexas.com">www.cctexas.com</a>	361-880-3196
City of Dallas Fair Housing Office	FHAP	<a href="http://www.dallascityhall.com">www.dallascityhall.com</a>	214-670-5677
Fort Worth Human Relations Commission	FHAP	<a href="http://fortworthtexas.gov">fortworthtexas.gov</a>	817-392-7525
Garland Office of Housing and Neighborhood Service	FHAP	<a href="http://www.ci.garland.tx.us/gov">www.ci.garland.tx.us/gov</a>	972-205-3316
Texas Workforce Commission	FHAP	<a href="https://twc.texas.gov/partners/civil-rights-discrimination">https://twc.texas.gov/partners/civil-rights-discrimination</a>	512-463-2642
Austin Tenants Council, Inc.	FHIP	<a href="http://www.housing-rights.org">www.housing-rights.org</a>	512-474-1961
Greater Houston Fair Housing Center, Inc.	FHIP	<a href="http://www.houstonfairhousing.org">www.houstonfairhousing.org</a>	713-641-3247
San Antonio Fair Housing Council, Inc.	FHIP	<a href="http://www.myfairhousing.org">www.myfairhousing.org</a>	210-733-3247

## Fair Housing Complaints and Trends

In order to search for and identify trends in fair housing, the State requested from HUD a comprehensive listing of all fair housing complaints in Texas from January 1, 2013, through May 30, 2018. Many of the figures and charts created for this section only include complaints from the beginning of 2013 through the end of 2017 in order to avoid complaints that would appear as “No Resolution,” because those filed in early 2018 are likely not yet fully resolved and may inflate complaint figures. The following complaint data includes:

- all cases from the TWC-CRD, which is responsible for enforcing the FFHA in Texas;
- cases investigated by HUD that involve Texas properties, but include violations of federal statutes over which TWC-CRD or local FHAPs do not have jurisdiction (e.g., Section 504 of the Rehabilitation Act);
- cases available from the Department of Justice (DOJ), relating to a joint initiative with HUD; and
- cases handled by local FHAP organizations.

**Figure 8-2: Fair Housing Claims Filed in Texas by Protected Class and Year, 2013-2017**



Source: U.S. Department of Housing and Urban Development.

Note: Each basis or protected class was considered as an individual claim. For this reason, one complaint may be included more than once in any year.

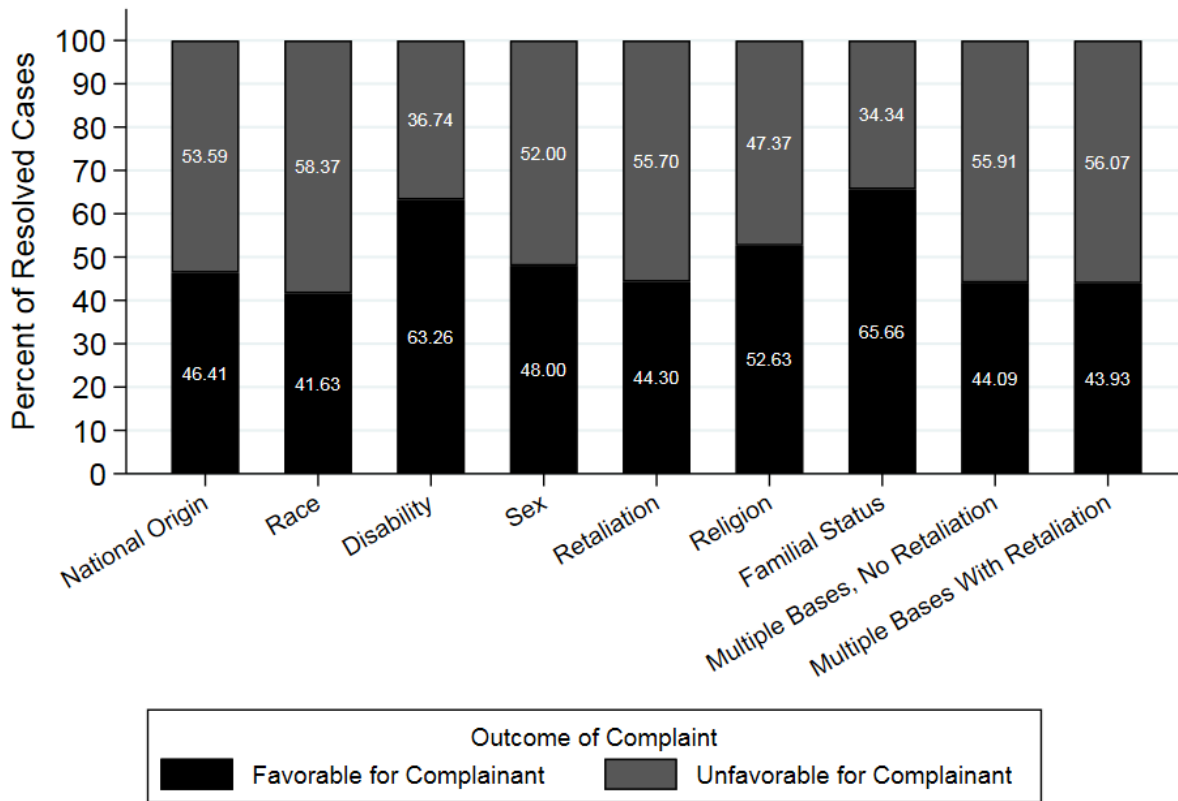
Figure 8-2 displays all fair housing claims filed in Texas over the past five years and Figure 8-3 presents these data in tabular form. The majority of fair housing claims filed in Texas are related to disability as a protected status, followed by race. In 2016 there was a large spike in the number of disability related claims. As confirmed by staff from TWC-CRD, the large spike in disability related claims in 2016 is due to a large number of claims filed by two non-profits that tested the occurrence of discrimination related to individuals with assistance animals. Most complaints filed in 2018 had not been resolved by June of 2018, when the data was provided to TDHCA for analysis. For this reason, 2018 is not included, as very few of these claims have been closed. Also important to note is that the counts of cases in the table and graph should not be aggregated to obtain an accurate measure of the total number of complaints filed, as a particular case may have denoted more than one protected class. Wherever used, the term “Other Bases” refers to complaints which allege discrimination based upon color, familial status, or religion. These protected classes each represented small numbers of the overall complaint profile, and were therefore combined to protect the identity of the complainants.

**Figure 8-3: Number of Fair Housing Cases by Year and Protected Class**

<b>Year</b>	<b>Protected Class</b>	<b>Cases</b>
2013	Disability	414
2013	Race	324
2013	National Origin	116
2013	Sex	86
2013	Other Bases	136
2014	Disability	525
2014	Race	345
2014	National Origin	133
2014	Sex	90
2014	Other Bases	98
2015	Disability	496
2015	Race	296
2015	National Origin	97
2015	Sex	85
2015	Other Bases	62
2016	Disability	757
2016	Race	233
2016	National Origin	81
2016	Sex	73
2016	Other Bases	72
2017	Disability	411
2017	Race	248
2017	National Origin	66
2017	Sex	55
2017	Other Bases	80

Source: U.S. Department of Housing and Urban Development.

**Figure 8-4: Resolution of Fair Housing Complaints in Texas by Protected Class or Basis, 2013-2017**



Source: U.S. Department of Housing and Urban Development.  
 Note: The figure only includes complaints for which there was a resolution.

The data in Figure 8-4 and Figure 8-5 represent all complaints in Texas for which there was a final resolution and that were filed from January 1, 2013 to December 31, 2017. Certain bases for fair housing complaints (such as disability) have higher rates of favorable outcomes for the complainant. Most other types of complaints are clustered with roughly 50% of outcomes favorable. The exception here is when the complainant alleges discrimination based on race.



Fair Housing Trends and Complaints

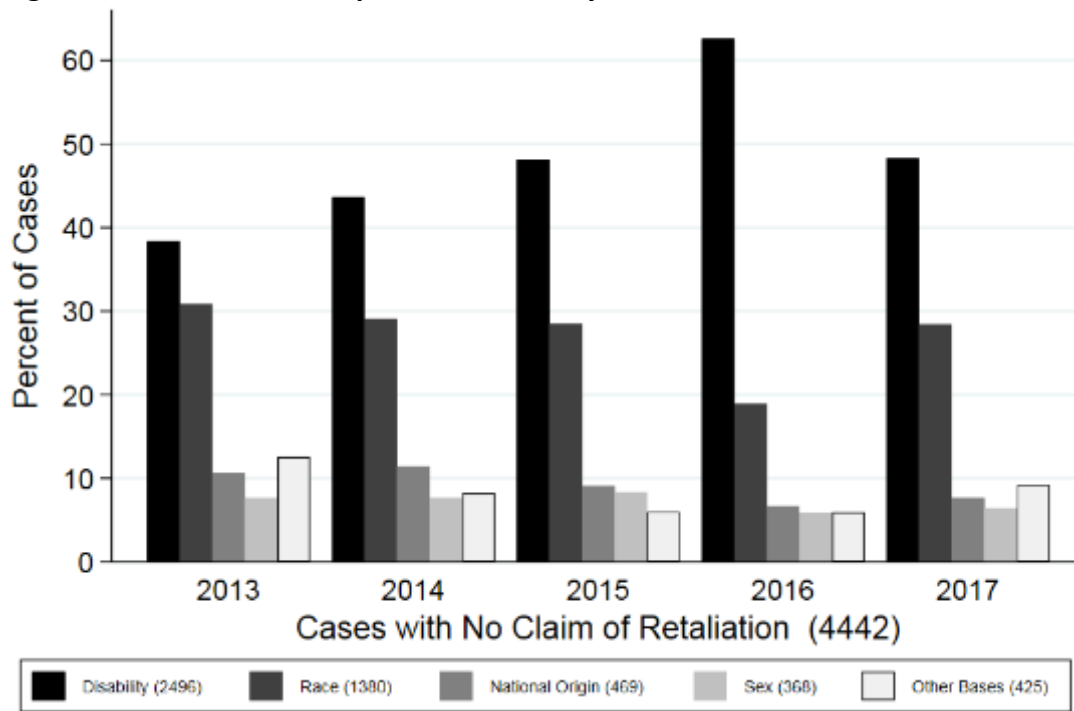
**Figure 8-5: Percent of Complaints by Resolution Type in Texas by Protected Class or Basis, 2013-2017**

Protected Class	Outcome	Percent of Complaints
National Origin	In Favor of Complainant	44.5%
National Origin	In Favor of Respondent	51.4%
National Origin	No Resolution	4.1%
Race	In Favor of Complainant	38.9%
Race	In Favor of Respondent	54.6%
Race	No Resolution	6.5%
Disability	In Favor of Complainant	60.0%
Disability	In Favor of Respondent	34.9%
Disability	No Resolution	5.1%
Sex	In Favor of Complainant	45.4%
Sex	In Favor of Respondent	49.2%
Sex	No Resolution	5.4%
Retaliation	In Favor of Complainant	43.8%
Retaliation	In Favor of Respondent	55.0%
Retaliation	No Resolution	1.2%
Religion	In Favor of Complainant	47.6%
Religion	In Favor of Respondent	42.9%
Religion	No Resolution	9.5%
Familial Status	In Favor of Complainant	59.6%
Familial Status	In Favor of Respondent	31.2%
Familial Status	No Resolution	9.2%
Multiple Bases, No Retaliation	In Favor of Complainant	40.1%
Multiple Bases, No Retaliation	In Favor of Respondent	50.9%
Multiple Bases, No Retaliation	No Resolution	9.0%
Multiple Bases, with Retaliation	In Favor of Complainant	41.3%
Multiple Bases, with Retaliation	In Favor of Respondent	52.7%
Multiple Bases, with Retaliation	No Resolution	6.0%

Source: U.S. Department of Housing and Urban Development.

Note: The table only includes complaints for which there was a resolution.

**Figure 8-6: Percent of Complaints in Texas by Year and Protected Class, Non-Retaliation**



Source: U.S. Department of Housing and Urban Development.

Note: Case numbers in the legend will not necessarily add to the total number of non-retaliation cases, as more than one protected class could be claimed in a case.

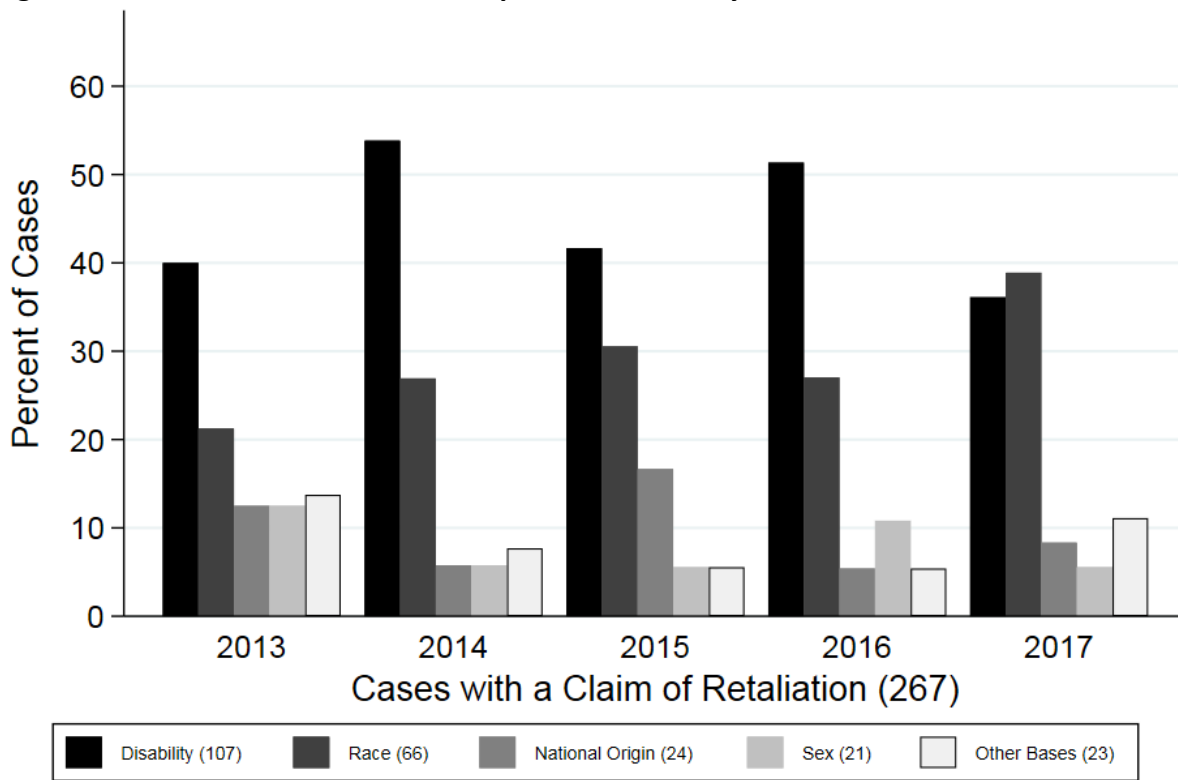
Figure 8-6 shows that there do not seem to be any clear trends in the prevalence of certain types of complaints over others as it relates to time. The large spike in disability-related complaints in 2016 was primarily the result of a large number of service animal related cases propagated by non-profit groups under grants they received, as previously mentioned.

**Figure 8-7: Number of Complaints in Texas by Year and Protected Class, Non-Retaliation**

Year	Disability	Race	National Origin	Sex	Other Bases
2013	382	307	106	76	125
2014	497	331	130	87	94
2015	481	285	91	83	60
2016	738	223	79	69	70
2017	398	234	63	53	76
Total	2,496	1,380	469	368	425

Source: U.S. Department of Housing and Urban Development.

**Figure 8-8: Percent of Retaliation Complaints in Texas by Year and Protected Class**



Source: U.S. Department of Housing and Urban Development.

Note: Case numbers in the legend will not necessarily add to the total number of retaliation cases, as more than one protected class could be claimed in a case.

In cases of retaliation, race appears to become more prevalent over the five-year period analyzed; however, this may be because the incidence of retaliation for other protected classes has generally decreased between 2013 and 2017.

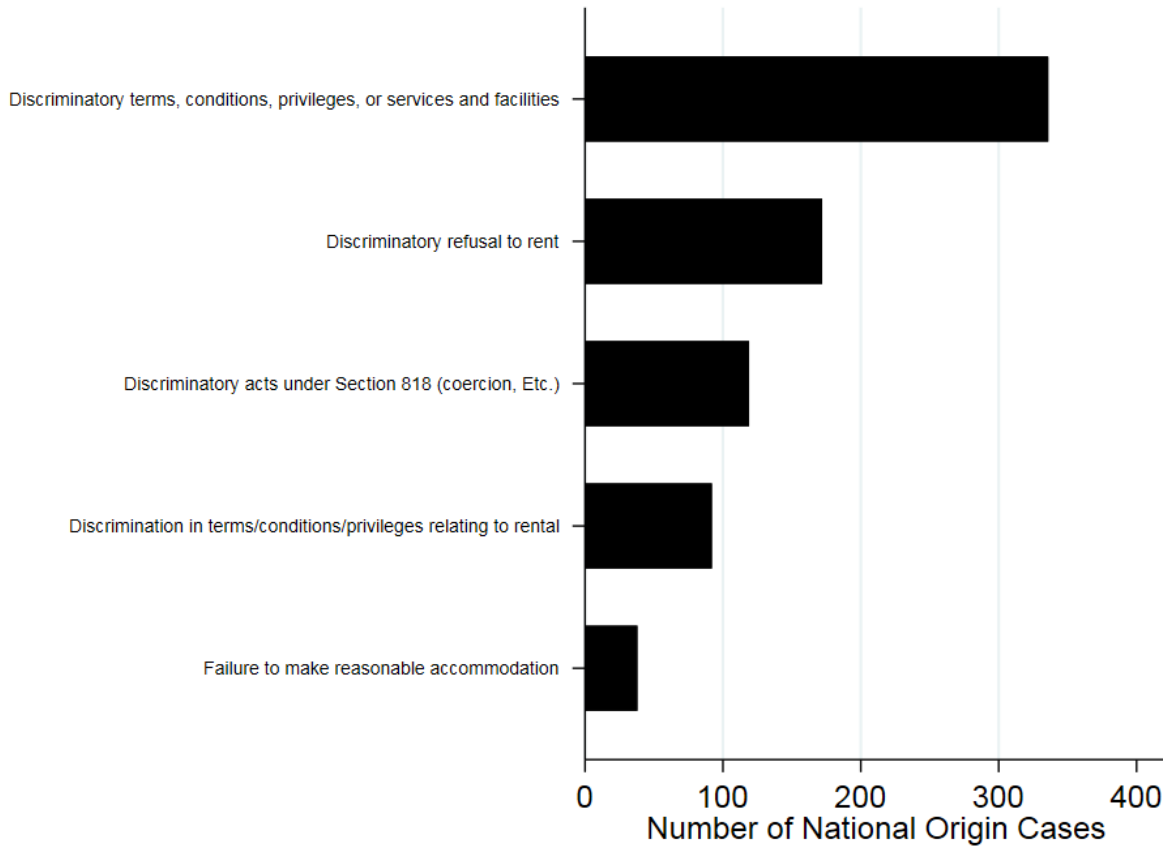
**Figure 8-9: Number of Retaliation Complaints in Texas by Year and Protected Class**

Year	Disability	Race	National Origin	Sex	Other Bases
2013	32	17	10	10	11
2014	28	14	3	3	4
2015	15	11	6	2	2
2016	19	10	2	4	2
2017	13	14	3	2	4
Total	107	66	24	21	23

Source: U.S. Department of Housing and Urban Development.

The next sequence of tables shows the primary claim made for each protected class.

**Figure 8-10: Primary Claim in Cases of National Origin Complaints, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

**Figure 8-11: Top 5 Claims in National Origin Complaints**

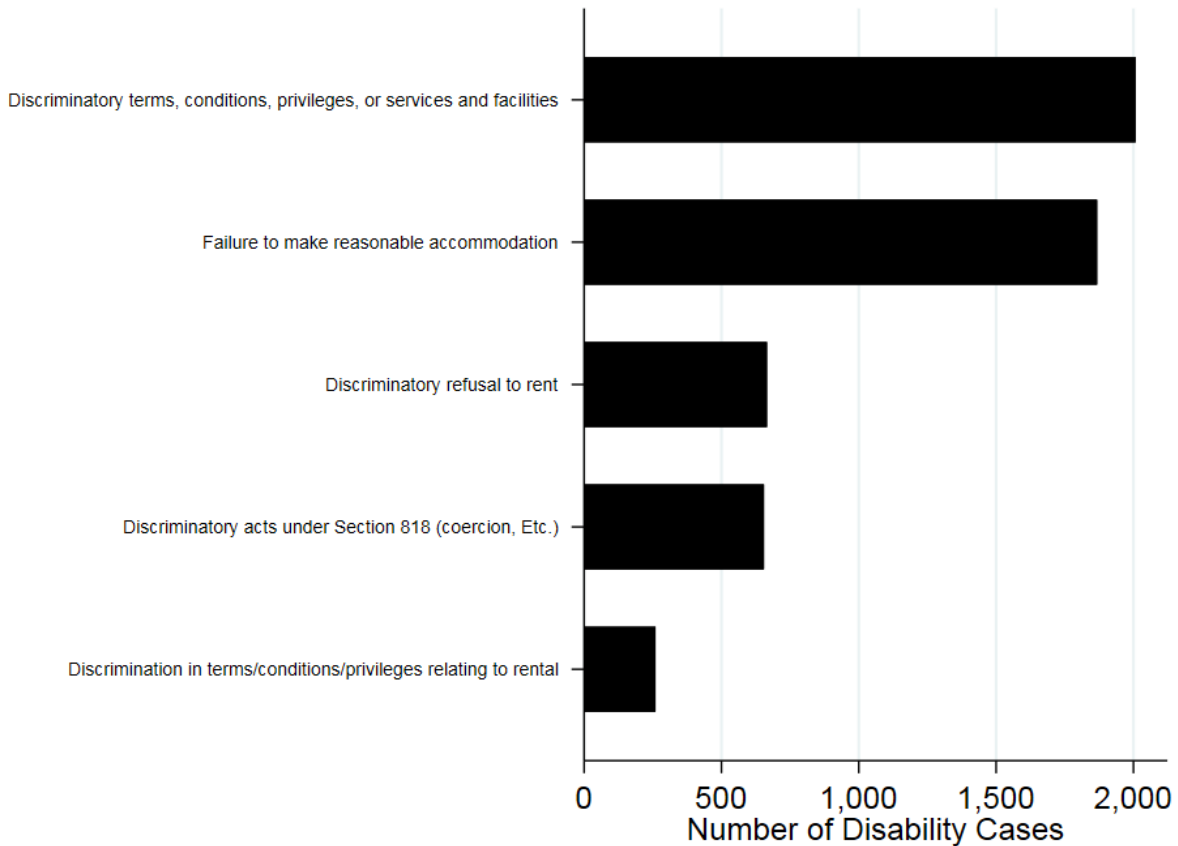
	Cases
Failure to make reasonable accommodation	38
Discrimination in terms/conditions/privileges relating to rental	92
Discriminatory acts under Section 818 (coercion, Etc.)	119
Discriminatory refusal to rent	172
Discriminatory terms, conditions, privileges, or services and facilities	336
<b>Total Cases Statewide</b>	<b>537</b>

Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

For complaints on the basis of national origin, the most common reported claims involved discriminatory terms, conditions, privileges, or facilities, which are often alleged as unfair or different application of a property’s terms and conditions or rules because of the complainant’s protected status. Please note that the individual issues listed in Figure 8-11 do not add up to the count of total cases statewide as each case can have more than one issue.

**Figure 8-12: Primary Claim in Cases of Disability-Based Complaints, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

**Figure 8-13: Top 5 Claims in Disability Complaints**

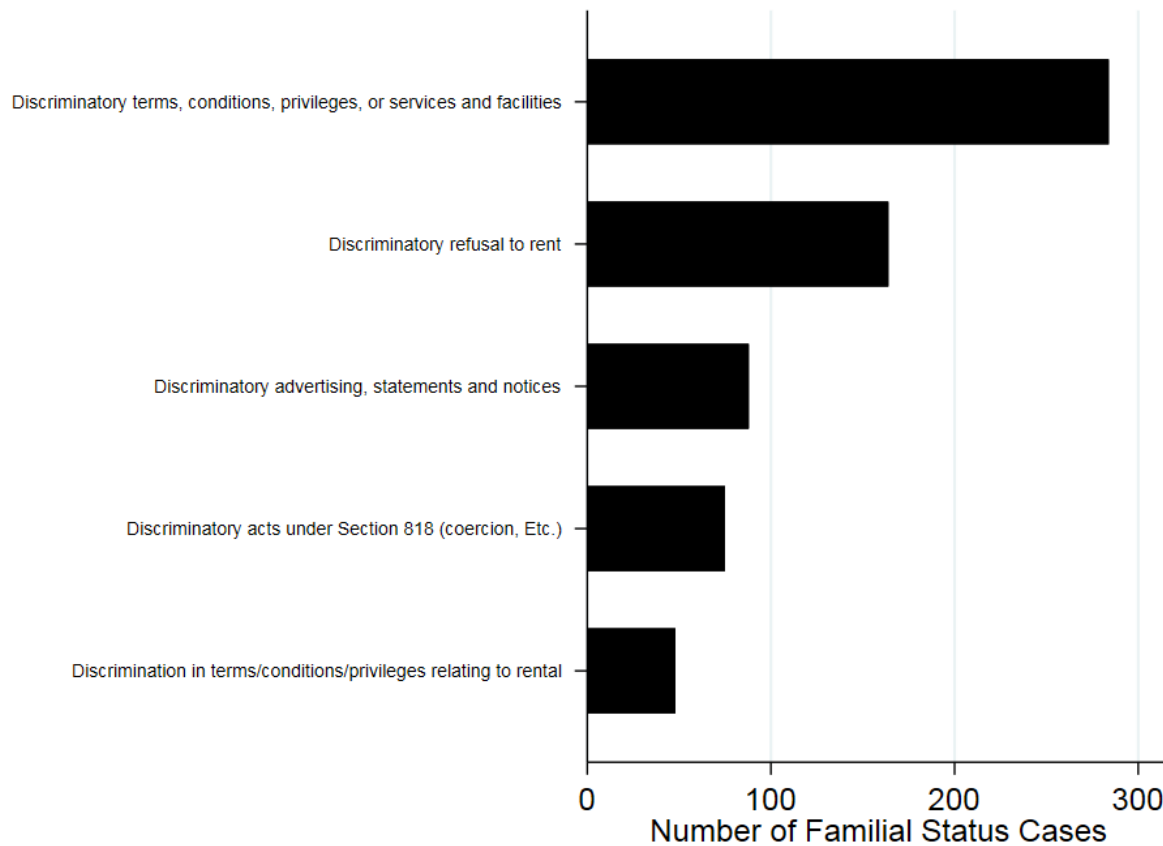
	Cases
Discrimination in terms/conditions/privileges relating to rental	260
Discriminatory acts under Section 818 (coercion, Etc.)	655
Discriminatory refusal to rent	666
Failure to make reasonable accommodation	1,868
Discriminatory terms, conditions, privileges, or services and facilities	2,008
<b>Total Cases Statewide</b>	<b>2,776</b>

Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

Figure 8-12 and Figure 8-13 show that in addition to discriminatory terms and conditions, one of the most common issues raised in disability-related complaints is the failure to make a reasonable accommodation. This is important, as disability cases comprise the largest portion of complaints in Texas.

**Figure 8-14: Primary Claims in Cases of Familial Status Complaints, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

**Figure 8-15: Top 5 Claims in Familial Status Complaints**

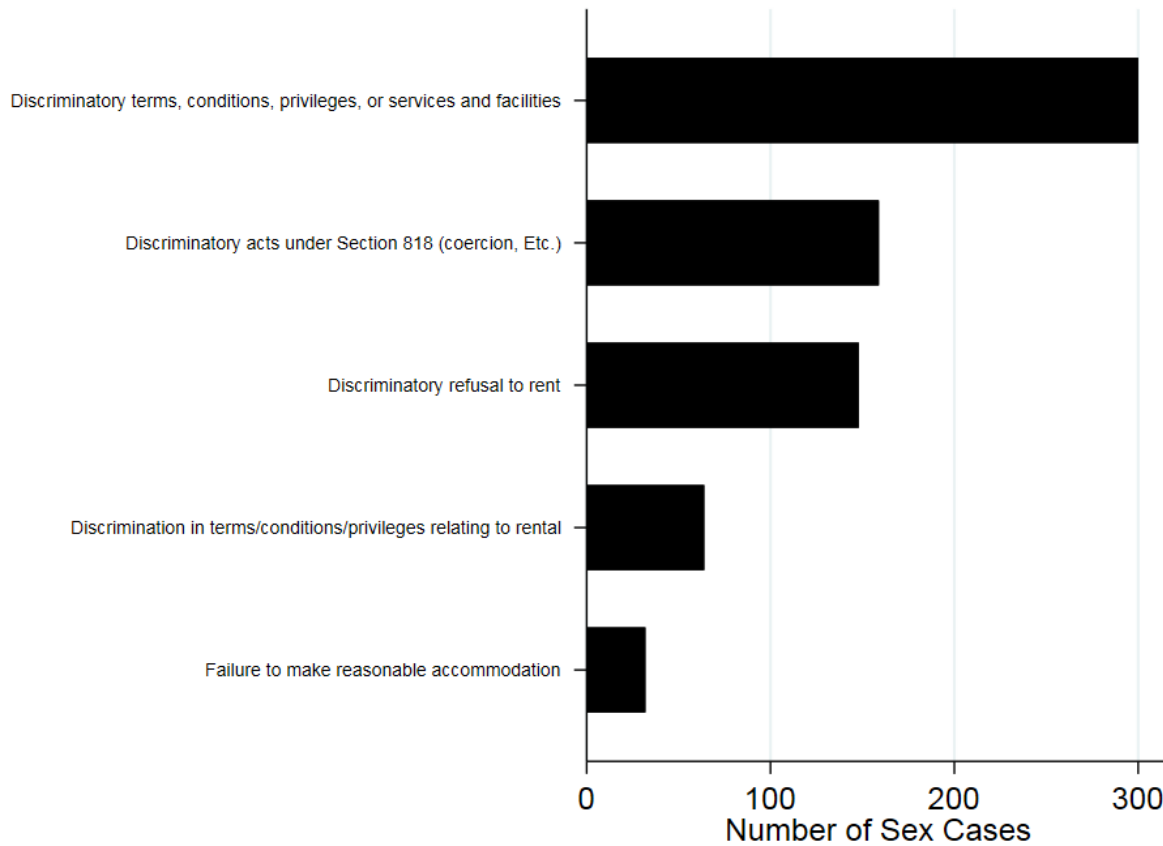
	Cases
Discrimination in terms/conditions/privileges relating to rental	48
Discriminatory acts under Section 818 (coercion, Etc.)	75
Discriminatory advertising, statements and notices	88
Discriminatory refusal to rent	164
Discriminatory terms, conditions, privileges, or services and facilities	284
<b>Total Cases Statewide</b>	<b>393</b>

Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

Figure 8-14 and Figure 8-15 show an increasing trend of complaints alleging refusal to rent based upon familial status. These would include cases in which a property allegedly imposed different rules upon households with children or purported in advertising that children were not allowed on the property. Unlike other protected classes, discriminatory advertising, statements, and notices is one of the top five claims in familial status complaints.

**Figure 8-16: Primary Claim in Cases of Sex-Based Complaints, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

**Figure 8-17: Top 5 Claims in Sex Complaints**

	Cases
Failure to make reasonable accommodation	32
Discrimination in terms/conditions/privileges relating to rental	64
Discriminatory refusal to rent	148
Discriminatory acts under Section 818 (coercion, Etc.)	159
Discriminatory terms, conditions, privileges, or services and facilities	300
<b>Total Cases Statewide</b>	<b>421</b>

Source: U.S. Department of Housing and Urban Development.

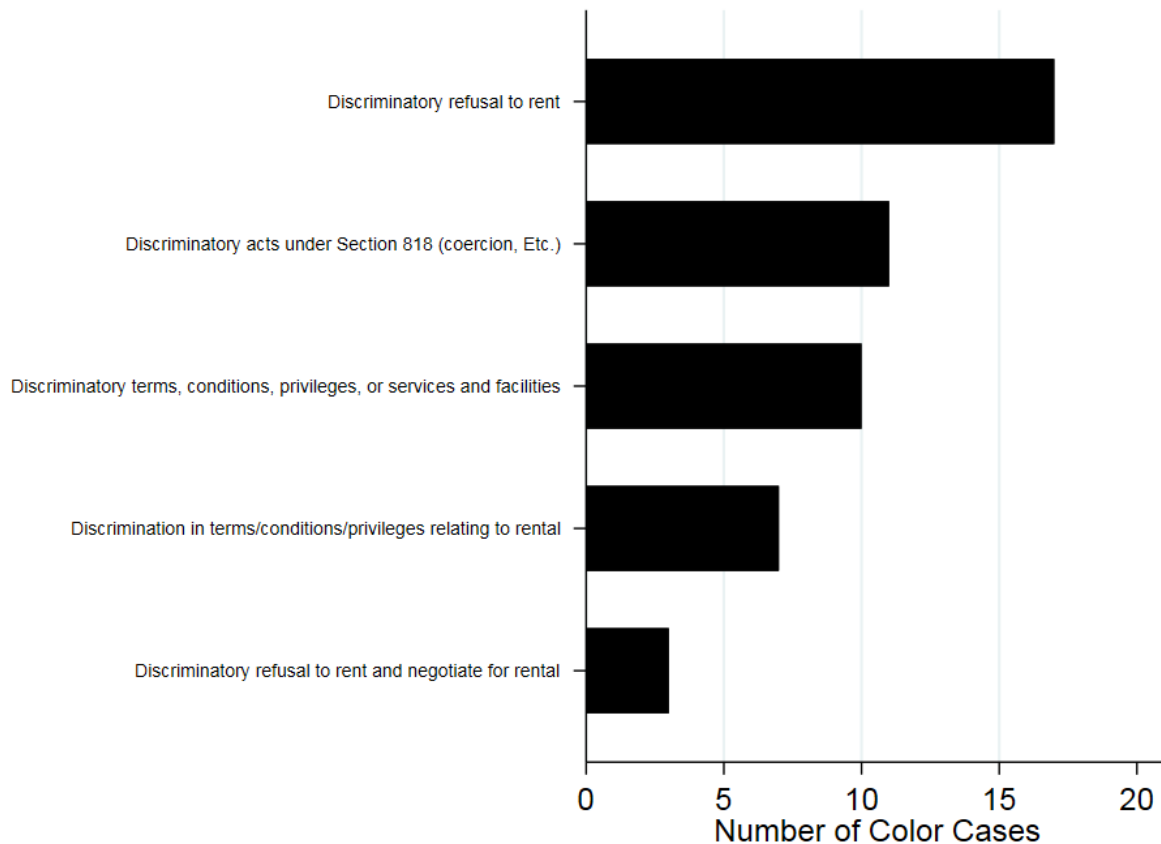
Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

Like most other protected classes, complaints involving sex tend to primarily regard discriminatory terms and conditions. However, Figure 8-16 and Figure 8-17 show that there are also a category of Section 818 complaints. Section 818 of the Fair Housing Act prohibits acts such as threats, coercion, retaliation, and intimidation in housing related to protected class and current or prior fair housing or discrimination complaints. Specific to this issue, in April 2018, HUD and DOJ announced a nationwide initiative to combat sexual harassment in housing. The

## Fair Housing Trends and Complaints

goal is to increase awareness of the laws that prohibit this issue and to increase reporting of potentially unlawful actions. Also, at the state level, TWC-CRD amended its corresponding rule in May 2018 to include harassment based on sex and the other protected classes, while specifically including the theories of *quid pro quo* and hostile environment harassment.

**Figure 8-18: Primary Claim in Cases of Color-Based Complaints, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

**Figure 8-19: Top 5 Claims in Color Complaints**

	Cases
Discriminatory refusal to rent and negotiate for rental	3
Discrimination in terms/conditions/privileges relating to rental	7
Discriminatory terms, conditions, privileges, or services and facilities	10
Discriminatory acts under Section 818 (coercion, Etc.)	11
Discriminatory refusal to rent	17
Total Cases Statewide	32

Source: U.S. Department of Housing and Urban Development.

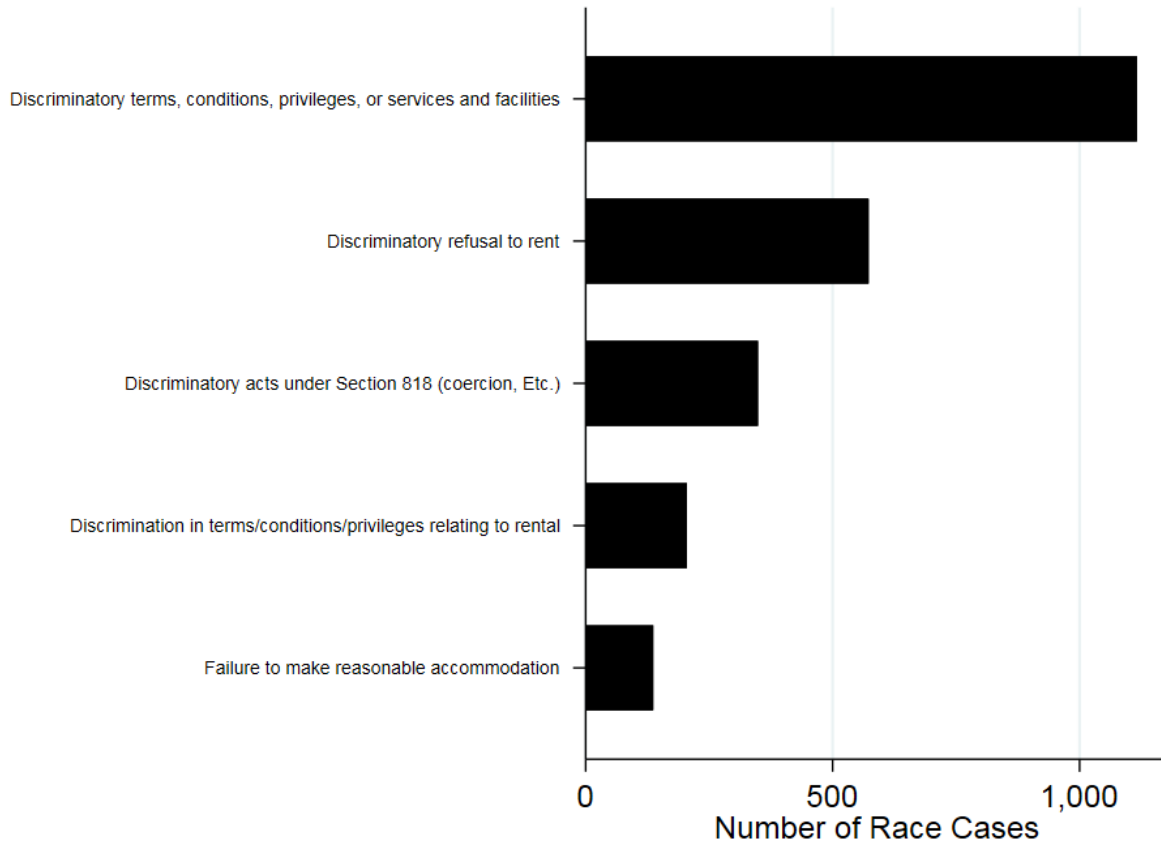
Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

Figure 8-18 and Figure 8-19 indicate that there are not enough cases regarding color discrimination in Texas to emphasize any clear trends. The protected class of color refers to a



person’s skin color. Color is separate from race because people can discriminate solely on color. An example of color discrimination would be making housing decisions that favor individuals with lighter complexions over those individuals with darker complexions, even if the individuals are of the same race or national origin.

**Figure 8-20: Primary Claim in Cases of Race-Based Complaints, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

**Figure 8-21: Top 5 Claims in Race Complaints**

	Cases
Failure to make reasonable accommodation	137
Discrimination in terms/conditions/privileges relating to rental	205
Discriminatory acts under Section 818 (coercion, Etc.)	349
Discriminatory refusal to rent	573
Discriminatory terms, conditions, privileges, or services and facilities	1,116
Total Cases Statewide	1,547

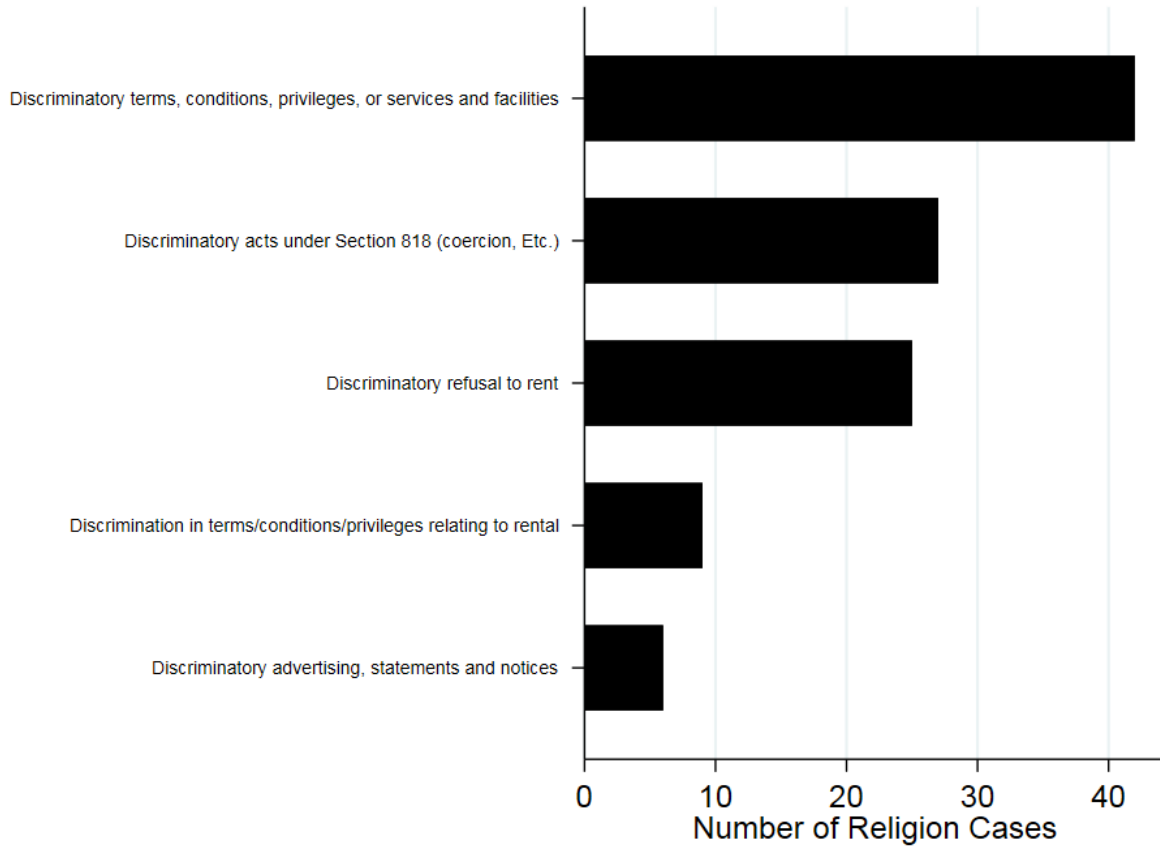
Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

## Fair Housing Trends and Complaints

Figure 8-20 and Figure 8-21 shows complaints where the protected status is race. The highest number of complaints alleged a discriminatory refusal to rent. It is important to note here that discriminatory terms and conditions refers not only to the terms as written, but also to their application.

**Figure 8-22: Primary Claims in Cases of Religion-Based Complaints, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

**Figure 8-23: Top 5 Claims in Religion Complaints, 2013-2017**

	Cases
Discriminatory advertising, statements and notices	6
Discrimination in terms/conditions/privileges relating to rental	9
Discriminatory refusal to rent	25
Discriminatory acts under Section 818 (coercion, Etc.)	27
Discriminatory terms, conditions, privileges, or services and facilities	42
<b>Total Cases Statewide</b>	<b>65</b>

Source: U.S. Department of Housing and Urban Development.

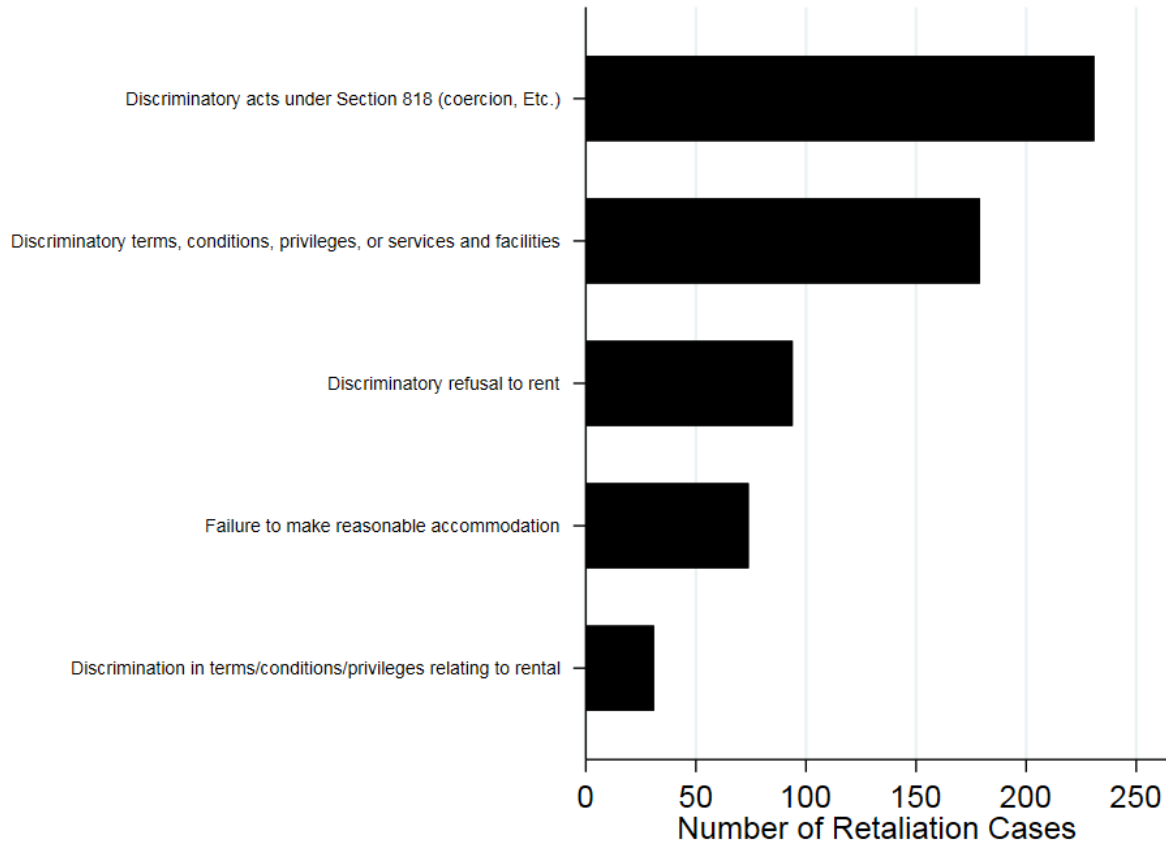
Note: Cases in this figure can have more than one protected class. This figure represents any cases where the class in the figure title is listed.

Similar to cases on the basis of race, religion cases tend to focus on discriminatory terms and retaliation, coercion, intimidation, and threatening. However, the number of complaints where

## Fair Housing Trends and Complaints

religion is the protected class is a small percentage of overall complaints. As reflected in Figure 8-23, considering that 65 complaints between 2013 and 2017 were made alleging religion as the basis for discrimination, with such few cases, it is inadvisable to make any conclusions on trends.

**Figure 8-24: Primary Claims in Cases Regarding Complaints of Retaliation, 2013-2018**



Source: U.S. Department of Housing and Urban Development.

Note: Cases in this figure will have at least one protected class in addition to retaliation.

**Figure 8-25: Top 5 Claims in Retaliation Complaints**

	Cases
Discrimination in terms/conditions/privileges relating to rental	31
Failure to make reasonable accommodation	74
Discriminatory refusal to rent	94
Discriminatory terms, conditions, privileges, or services and facilities	179
Discriminatory acts under Section 818 (coercion, Etc.)	231
<b>Total Cases Statewide</b>	<b>293</b>

Source: U.S. Department of Housing and Urban Development.

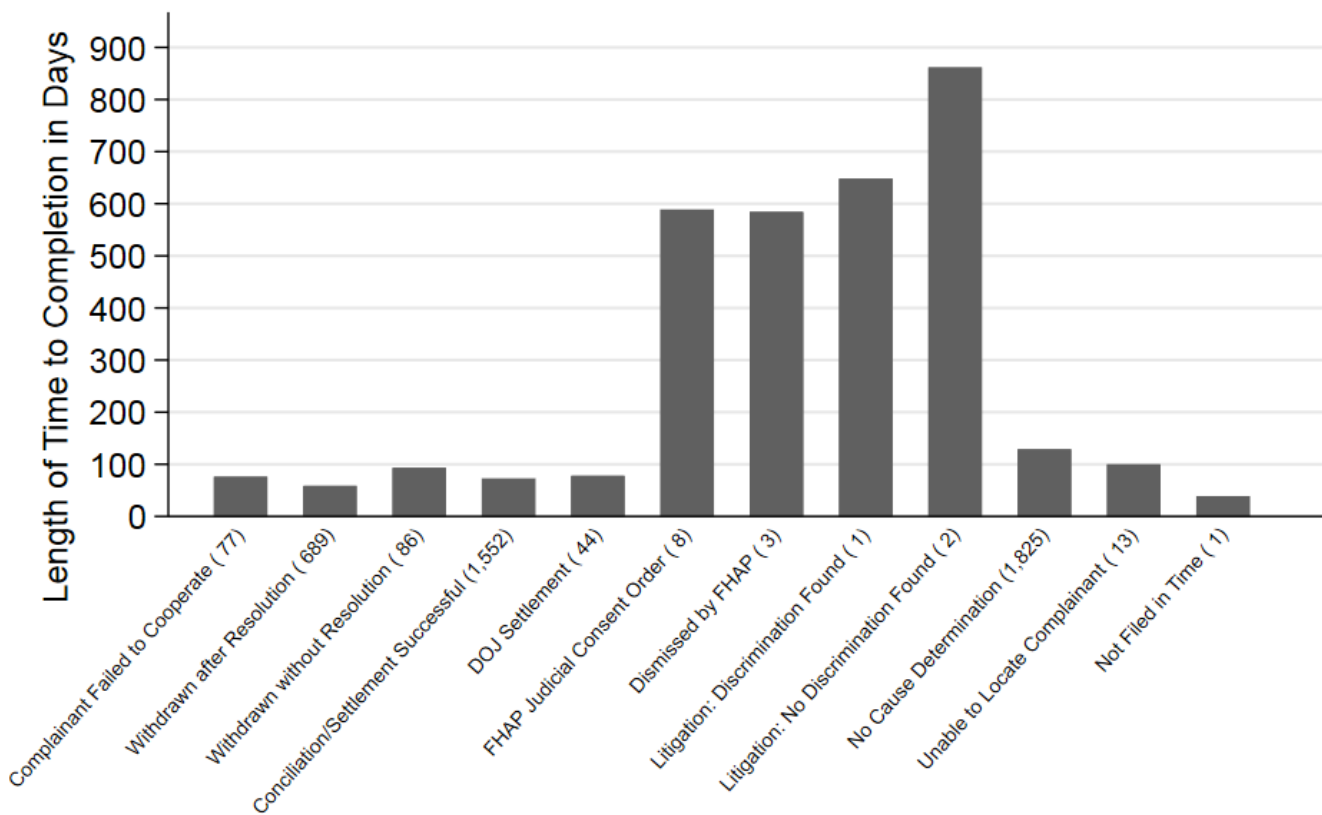
Note: Cases in this figure will have at least one protected class in addition to retaliation.

Figure 8-24 and Figure 8-25 show retaliation complaints under Section 818 of the Fair Housing Act. Section 818 of the Fair Housing Act prohibits acts of retaliation, but these complaints are often associated with reasonable accommodation requests and discriminatory terms and services, and often include one of the seven protected classes. Retaliation under Section 818

## Fair Housing Trends and Complaints

of the Fair Housing Act is clarified by HUD as including: verbal or written coercion to deny or limit the benefits provided that person in connection with the sale or rental of a dwelling or in connection with a residential real estate-related transaction because of protected class; threatening, intimidating or interfering with persons in their enjoyment of a dwelling because of their protected class; threatening an employee or agent with dismissal or an adverse employment action, or taking such adverse employment action, for any effort to assist a person seeking access to the sale or rental of a dwelling or seeking access to any residential real estate-related transaction, because of their protected class; intimidating or threatening any person because that person is engaging in activities designed to make other persons aware of, or encouraging such other persons to exercise, rights granted or protected based on their protected class; retaliating against any person because that person has made a complaint, testified, assisted, or participated in any manner in a proceeding under the Fair Housing Act; or retaliating against any person because that person reported a discriminatory housing practice to a housing provider or other authority.

**Figure 8-26: Average Number of Days to Completion of a Complaint by TWC-CRD and FHAPs, by Final Disposition, 2013-2017**



### Texas F.H.A.P. Complaints

Source: U.S. Department of Housing and Urban Development.  
 Note: Number in parentheses is the number of cases overall in that category.

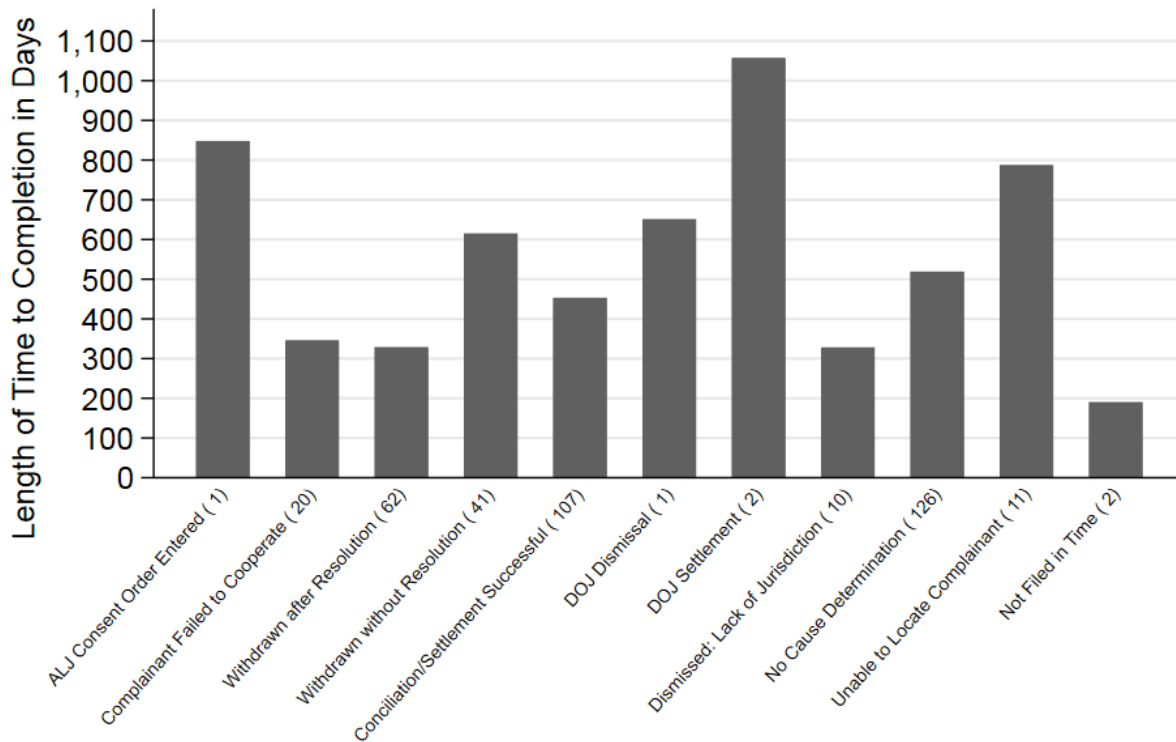
**Figure 8-27: Average Number of Days to Completion of Complaints to TWC-CRD and Other Texas FHAPs, 2013-2017**

<b>Disposition</b>	<b>Average Number of Days</b>	<b>Total Cases</b>
Complainant failed to cooperate	76	77
Complaint withdrawn by complainant after resolution	59	689
Complaint withdrawn by complainant without resolution	93	86
Conciliation/settlement successful	72	1,552
Dismissed for lack of jurisdiction	78	44
FHAP judicial consent order	589	8
FHAP judicial dismissal	584	3
Litigation ended - discrimination found	648	1
Litigation ended - no discrimination found	862	2
No cause determination	129	1,825
Case Not Selected	-	4
Unable to locate complainant	100	13
Untimely Filed	39	1

Source: U.S. Department of Housing and Urban Development.

In Texas FHAPs, including TWC-CRD, the majority of cases are found to have no cause or enter conciliation agreements. While not necessarily reflective of the processes used by all Texas FHAPs, the conciliation process used by the TWC-CRD is a much faster means of handling complaints, shown in Figure 8-26, as it often brings the complainant and respondent together to build a solution that can work for both sides. It is also much faster at dealing with complaints than the longer and more difficult path of litigation, which can take as long as three years.

**Figure 8-28: Average Number of Days to Completion of a Complaint by HUD or DOJ by Final Disposition, 2013-2017**



**H.U.D. Complaints**

Source: U.S. Department of Housing and Urban Development.  
 Note: Number in parentheses is the number of cases overall in that category.

**Figure 8-29: Average Number of Days to Completion of Complaints to HUD/DOJ, 2013-2017**

Disposition	Average Number of Days	Total Cases
Administrative Law Judge (“ALJ”) consent order entered after issuance of charge	848	1
Complainant failed to cooperate	346	20
Complaint withdrawn by complainant after resolution	328	62
Complaint withdrawn by complainant without resolution	615	41
Conciliation/settlement successful	456	107
DOJ dismissal	651	1
DOJ settlement	1,057	2
Dismissed for lack of jurisdiction	328	10
No cause determination	519	126
Not Selected	-	1
Unable to locate complainant	787	11
Untimely Filed	190	2

Source: U.S. Department of Housing and Urban Development.

## Fair Housing Trends and Complaints

Complaints that go to HUD take much longer to resolve than cases that are referred to TWC-CRD and other FHAPs. Of the complaints filed with HUD, those that were untimely filed each took almost 200 days to resolve, illustrated in Figure 8-29. Even conciliation agreements through HUD, which were usually settled in less than 100 days by TWC-CRD and other FHAPs, took on average a year and half to resolve. This may be the reason for a large number of complaints being withdrawn without resolution, as many of those complaint processes lasted 600 days or more. Settlement through the DOJ took even longer, averaging almost 1,100 days. However, in Texas, more than 90% of all fair housing complaints are handled by TWC-CRD and other Texas FHAPs and are, therefore, handled more quickly.

**Figure 8-30: Complaints Filed with HUD, DOJ, or FHAPs from 2013 to 2018 by TDHCA Service Region**

TDHCA Region	Complaints Filed	2012-2016 ACS Population	Complaints per 10,000 People
1. High Plains	67	862,549	0.78
2. Northwest Texas	44	549,998	0.80
3. Metroplex	2,399	7,270,729	3.30
4. Upper East Texas	91	1,127,937	0.81
5. Southeast Texas	56	772,275	0.73
6. Gulf Coast	927	6,651,406	1.39
7. Capital	627	2,059,404	3.04
8. Central Texas	131	1,163,149	1.13
9. San Antonio	411	2,442,108	1.68
10. Coastal Bend	118	788,037	1.50
11. South Texas Border	72	1,789,599	0.40
12. West Texas	39	621,359	0.63
13. Upper Rio Grande Valley	45	857,885	0.52

Source: U.S. Department of Housing and Urban Development and U.S. Census Bureau American Community Survey 5-Year Estimates, 2012-2016.

Even after controlling for differences in population, the denser service regions still saw more complaints, as seen in Figure 8-30.

### Complaints Filed with TDHCA

In addition to HUD, DOJ, TWC-CRD and other FHAPs in the state of Texas, TDHCA also receives and investigates complaints. TDHCA's jurisdiction to handle complaints is limited to properties or programs that it monitors. However, sometimes complaints about TDHCA-monitored properties or programs include fair housing concerns. For these complaints, TDHCA can offer technical assistance to the residents or properties involved in the complaint, as well as refer complaints to the TWC-CRD through a Memorandum of Understanding (MOU) that exists between the two agencies.

**Figure 8-31: TDHCA-Fielded Fair Housing Related Complaints by Method of Contact, September 2016 through June 2018**

	Complaints	Percent of Complaints
Email	16	15.1%
Fax	11	10.4%
Letter	20	18.9%
Phone	5	4.7%
Web	54	50.9%

Source: Texas Department of Housing and Community Affairs Complaints Database.

Figure 5-228 displays the number of complaints that TDHCA received that involved fair housing concerns and the method by which the complaint was received. While 65% of complaints came in electronically, nearly one in five complaints was received as a letter, which may be because those filing complaints have less reliable access to the Internet. TDHCA’s continued acceptance of written, including hand-written, complaints makes information on fair housing issues and technical assistance more available to those who may not have ready access to information and resources regarding their rights and responsibilities. In addition, if a reasonable accommodation is requested or translation services are necessary TDHCA is able to receive complaints over the phone.

**Figure 8-32: TDHCA-Fielded Fair Housing Related Complaints by Year, September 2016-June 2018**

Fiscal* Year	Complaints
2016	41
2017	39
2018 (Jan-June)	27

Source: Texas Department of Housing and Community Affairs Complaints Database.

\* Note that a full FY is represented for 2016 and 2017, however 2018 is only a partial year.

From September 1, 2017, through June 6, 2018, TDHCA had received about two-thirds of the fair housing related complaints that had been received in each of the previous two fiscal years. Figure 8-32 shows that the number of fair housing related complaints has remained fairly consistent with the data available, with the exception of FY 2018, where data is incomplete, lacking the final few months of the fiscal year. Prior to 2016, tracking of complaints related to fair housing were most often associated with the program area or with compliance and inspections and were not as clearly denoted as having fair housing implications. For consistency, data is only presented from 2016 onward.



**Figure 8-33: TDHCA Fair Housing Related Complaints by Program Source, September 2016-June 2018**

	<b>Complaints</b>	<b>Percent of Complaints</b>
Community Affairs	1	0.9%
Multifamily Compliance	75	69.4%
Multifamily Physical Inspections	1	0.9%
Energy Assistance	3	2.8%
Fair Housing	27	25.0%
Multi-Family Development	1	0.9%

Source: Texas Department of Housing and Community Affairs Complaints Database.

While TDHCA does have a Fair Housing, Data Management, and Reporting group, most of the fair housing-related cases come in paired with some other issue or through another TDHCA program area. Figure 8-33 shows that more than two thirds of fair housing related complaints came in as complaints related to some form of multifamily monitoring activity, and only a quarter were specific to fair housing issues. For cases where TDHCA does not have jurisdiction, the matter would be referred to TWC through the MOU, or technical assistance would be given to direct the complainant to contact the proper authority with jurisdiction over the matter.

### **Fair Housing Testing**

As part of the AI consultation process, the State held two consultation meetings specifically for FHIP and FHAP participating organizations. FHIP and FHAP organizations in Texas were invited to participate in the consultation sessions, which specifically asked if there were fair housing testing reports or audits that should be considered for the State of Texas Analysis of Impediments to Fair Housing Choice. No fair housing tests or audits were voluntarily submitted by the FHIP or FHAP organizations to the State for the 2019 AI.

Figure 8-34 reflects known instances of non-compliance or Voluntary Compliance Agreements with Title VI, Section 504, or the Fair Housing Act, in Texas in which the parties involved were units of local government and a federal oversight entity.

**Figure 8-34: Findings of Non-Compliance and Voluntary Compliance Agreements with Title VI, Section 504, or the Fair Housing Act for units of government**

Date	Parties Involved	Parties Involved	Resolution
11/22/13	The United States Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity	City of Dallas	Findings of Non-Compliance: <a href="https://www.scribd.com/document/188785617/HUD-Letter-of-Findings-of-Non-Compliance">https://www.scribd.com/document/188785617/HUD-Letter-of-Findings-of-Non-Compliance</a> Voluntary Compliance Agreement: <a href="http://dallascityhall.com/departments/fairhousing/DCH%20Documents/pdfs/dallas-hud-executed-vca.pdf">http://dallascityhall.com/departments/fairhousing/DCH%20Documents/pdfs/dallas-hud-executed-vca.pdf</a>
2015	Corpus Christi, Hillcrest, and Washington-Coles neighborhood	Federal Highway Administration and the Texas Department of Transportation	Voluntary Resolution Agreement: <a href="https://txlihis.files.wordpress.com/2015/12/two-party-agreement-harbor-bridge-v18.pdf">https://txlihis.files.wordpress.com/2015/12/two-party-agreement-harbor-bridge-v18.pdf</a>
3/7/16	United States of America	City of Fort Worth, Texas, et al.	Consent Decree: <a href="https://www.justice.gov/crt/case-document/consent-decree-united-states-v-city-fort-worth-nd-tex">https://www.justice.gov/crt/case-document/consent-decree-united-states-v-city-fort-worth-nd-tex</a>
3/16/16	Alissa Humphrey	City of Beaumont	Consent Decree: <a href="https://www.justice.gov/crt/file/873611/download">https://www.justice.gov/crt/file/873611/download</a>
3/6/18	The United States Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity	City of Houston	Findings of Non-Compliance: <a href="http://www.renocavanaugh.com/sites/default/files/hud-notices/D0597901.PDF">http://www.renocavanaugh.com/sites/default/files/hud-notices/D0597901.PDF</a> Voluntary Compliance Agreement: <a href="https://www.hud.gov/sites/dfiles/Main/documents/VoluntaryComplianceAgreement.pdf">https://www.hud.gov/sites/dfiles/Main/documents/VoluntaryComplianceAgreement.pdf</a>

## Summary of the State's Current Fair Housing Legal Status

- *Rosas v. University of Texas at San Antonio and University of Texas at Austin*, U.S. District Court, Western District of Texas, San Antonio Division, No. 5-18-cv-00536: Pro se plaintiff alleges violations of Title VIII of the Civil Rights Act, among other claims. On September 5, 2018, the defendants moved to dismiss the lawsuit for failing to state a claim upon which relief could be granted. The motion to dismiss is currently pending before the district court.
- *City of Austin v. Ken Paxton and Texas Workforce Commission*, U.S. District Court, Western District of Texas, Austin Division, No. 1:17-cv-00834: The City of Austin alleges that Section 250.007 of the Texas Local Government Code violates the federal Fair Housing Act (42 U.S.C. § 3615), among other claims. On July 12, 2018, the district court granted in part and denied in part the defendants' motion to dismiss. An appeal of the district court's ruling on the defendants' assertion of qualified immunity is currently pending in the U.S. Court of Appeals for the Fifth Circuit (Case No. 18-50646).
- *Inclusive Communities Project, Inc. (ICP) v. Governor Greg Abbott and the City of Dallas*, U.S. District Court, Northern District of Texas, Dallas Division, No. 3:17-cv-0440-D: The plaintiff, (ICP) alleged that Section 250.007 of the Texas Local Government Code violated the federal Fair Housing Act (42 U.S.C. §§ 3604, 3615), among other claims. On May 29, 2018, the district court entered final judgment for the defendants on all claims, dismissing the suit without prejudice. ICP did not appeal the district court's judgment.
- *Soniat v. Texas Real Estate Commission, et al.*, U.S. District Court, Eastern District of Texas, Sherman Division, No. 4:17-cv-00166: Pro se plaintiff alleged violation of the federal Fair Housing Act, among other claims, based on purported acts of housing discrimination by potential landlords and others. On June 5, 2017, the district court dismissed all claims with prejudice. The Fifth Circuit dismissed Soniat's appeal as frivolous on May 9, 2018 (Case No. 17-40637).
- *Sims v. Sharon Gamble, et al.*, U.S. District Court, Southern District of Texas, Houston Division, No. 4:17-cv-02359 (initially filed in W.D. Louisiana as C.A. No. 5:17-cv-00447): Sims sued two TDHCA employees and others, alleging that TDHCA's rejection of his applications for tax credits to construct housing developments violated the federal Fair Housing Act and Section 504 of the Rehabilitation Act, among other claims. On January 17, 2018, the district court entered final judgment for defendants on all claims, dismissing the suit with prejudice. Sims did not appeal the district court's judgment.
- *Sims v. Texas Department of Housing and Community Affairs, et al.*, U.S. District Court, Western District of Texas, Austin Division, No. 1:16-cv-00906: Sims alleged that TDHCA's rejection of his applications for tax credits to construct housing developments violated the federal Fair Housing Act and Section 504 of the Rehabilitation Act, among other

claims. On January 30, 2017, the district court entered final judgment for defendants on all claims, dismissing the suit with prejudice. Sims did not appeal the district court's judgment.

- *Inclusive Communities Project, Inc. v. Texas Department of Housing and Community Affairs, et al.*, U.S. District Court, Northern District of Texas, Dallas Division, No. 3:08-cv-0546-D: On June 25, 2015, the United States Supreme Court ruled in ***Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*** (S. Ct.) that disparate impact claims are cognizable under the Fair Housing Act. The Supreme Court's ruling was consistent with the position taken in an amicus brief filed by the United States on December 23, 2014. The United States argued that HUD, the agency charged with interpreting the Act, has authoritatively interpreted the FHA to provide for disparate impact claims by means entitled to deference under *Chevron U.S.A., Inc. v. NRDC*, including in a formal regulation promulgated in 2013 and in formal adjudications. The United States further argued that HUD's construction of the FHA follows directly from the text, structure, and history the FHA. Finally, the United States argued that a state or local government does not violate the Constitution's Equal Protection Clause merely by considering whether a proposed action will have a disparate impact on the basis of race.

The plaintiff (ICP) alleged that TDHCA's allocation of Low Income Housing Tax Credits in the Dallas area violated the federal Fair Housing Act (42 U.S.C. §§ 3604(a), 3605(a)), among other claims. On August 26, 2016, following remand from the U.S. Supreme Court, the district court entered judgment for the defendants on ICP's lone remaining cause of action (a disparate-impact FHA claim), dismissing the suit with prejudice. ICP did not appeal the district court's August 2016 judgment.

- *Galveston Open Government Project, et al. v. U.S. Department of Housing and Urban Development, et al.*, U.S. District Court, Southern District of Texas, Galveston Division, No. 3:13-cv-00439: The plaintiffs brought class action lawsuit against numerous parties, including the Texas General Land Office, TDHCA, and the State of Texas, alleging that the reconstruction of Galveston public housing after Hurricane Ike violated the federal Fair Housing Act, among other claims. On August 13, 2014, the district court entered final judgment dismissing all claims against the State entities. The Fifth Circuit affirmed the judgment on July 23, 2015 (Case No. 14-40955).
- *Texas Workforce Commission-Civil Rights Division v. Vaman Investments LLC*, 434th Judicial District Court, Fort Bend County, Texas: TWC-CRD alleges that an apartment complex owner violated the Texas Fair Housing Act by providing two prospective tenants conflicting information regarding rental terms and conditions. TWC-CRD brought this suit on behalf of a fair-housing organization that sent two individuals—an African-American tester and a Hispanic tester—to conduct rental testing at the complex within one hour of each other on the same day. During the testing, the complex's leasing agent gave less favorable information regarding the rate and availability of apartment units to the

African-American tester compared to the Hispanic tester. The case went to trial on October 16, 2018, and the jury returned a verdict in favor of TWC-CRD.

## Fair Housing Discrimination Suits Filed by DOJ, and Resulting Consent Decrees<sup>34 35 36</sup>

- ***United States v. Stonebridge*** (N.D. Tex),

On January 8, 2014, the 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.

<https://www.justice.gov/sites/default/files/crt/legacy/2014/01/13/stonebridgesettle.pdf>

- ***United States v. Toone*** (E.D. Tex.)

On July 17, 2014, the court entered the settlement order in ***United States v. Toone*** (E.D. Tex.), a Fair Housing election case alleging discrimination because of sex. The order requires defendants to modify their non-discrimination policy and pay \$4,000 to the aggrieved persons.

<https://www.justice.gov/sites/default/files/crt/legacy/2014/07/21/toonesettle.pdf>.

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<sup>34</sup> TDHCA sent HUD a Freedom of Information Act (“FOIA”) request regarding this information on July 13, 2018, but as of September 30, 2018, had not received a response.

<sup>35</sup> TDHCA sent DOJ a FOIA request regarding this information on July 17, 2018, but as of September 30, 2018, had not received a response. Thus, this information is limited to the publically available information on the DOJ’s website.

<sup>36</sup> Suits that involve the State of Texas or a unit of government are found elsewhere in this Chapter.

## **Chapter 9 - Disaster Recovery in Texas**

### **Disaster Vulnerability in Texas**

#### **Introduction**

The State of Texas, with its varying geographical regions and climates, presents a wide variation of vulnerability to all types of disasters within its borders. In understanding why such a wide variety of hazards can occur across Texas, a general overview of the geographical characteristics of the state and the correlating weather patterns is warranted.

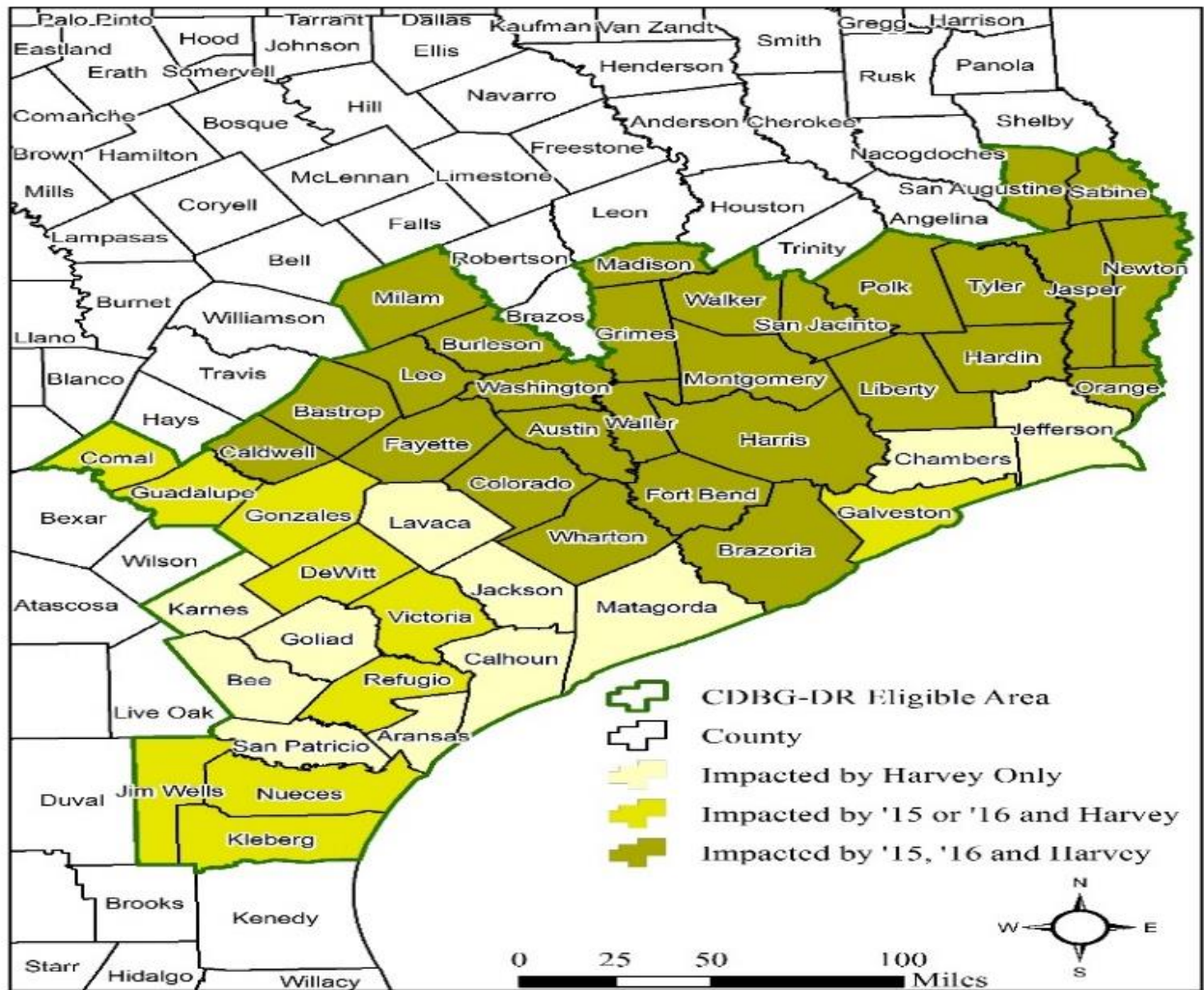
The following information, as taken directly from the 2013 State of Texas Hazard Mitigation Plan, works to adequately explain these variations in more detail.

#### **Cumulative Impact of Recent Disasters**

As recent as 2010, Texas entered into a historic period of drought which resulted in the driest 12-month period on record with a statewide average of only 11.18 inches of rain. This drought contributed greatly to a series of catastrophic wildfires from November 2010 to December of 2011 which burned 3.9 million acres and damaged or destroyed approximately 5,900 structures.

Severe drought conditions also led to a higher risk level for flash flooding as conditions greatly impacted the ability of soils to effectively absorb water runoff. In 2015 and 2016 Texas received record amounts of rainfall resulting in six Federal Disaster Declarations spread over 160 of the state's 254 counties. To date, the state of Texas still estimates \$2 billion in unmet need from these events. The below map highlights the counties that have been substantially impacted by these aforementioned disasters.

Figure 9-1: CDBG-DR Eligible Counties in Texas



### Mitigation Efforts and Responsible Agencies

Mitigation, as defined by the Texas Department of Public Safety State Hazard Mitigation Plan, covers sustained actions taken to reduce or eliminate long-term risk to people and their property from the effects of natural hazards. These efforts are shared by the Federal Emergency Management Agency (FEMA), The Texas Department of Emergency Management (TDEM), and The Texas General Land Office (GLO) as the primary state agency charged with the administration of disaster recovery funds.

### Federal Emergency Management Agency

The Federal Emergency Management Agency is the agency created under the U.S. Department of Homeland Security that was created with the primary purpose of coordinating responses to disasters that have occurred in the United States that significantly overwhelm the resources of local and state authorities.

Typically, FEMA provides assistance to local and state authorities during and immediately following a disaster by coordinating the deployment of federal officials into the impact area to implement federal programs. These duties include, but are not limited to, post-disaster damage assessments, provision of Temporary Sheltering Assistance, and the administration of Direct Temporary Housing Programs.

FEMA also maintains mitigation responsibilities through its' Mitigation Directorate, the primary vehicle through which mitigation efforts, programs, and policies are designed in an effort to identify risks and reduce injuries, loss of property, and recovery time.

FEMA is also the facilitating agency for Pre-Disaster Mitigation grants which are made available to eligible communities. These grants provide mitigation funding for activities such as acquiring property for conversion to open space, retrofitting existing buildings, constructing tornado and storm shelters, managing vegetation for erosion and fire control, and implementing small flood control projects.

### **Texas Department of Emergency Management**

The Texas Department of Emergency Management is the primary state agency tasked with coordinating the State Emergency Management Program. The State Emergency Management Program coordinates with state and local governments to develop processes and procedures that work to lessen the impact of emergencies and disasters.

TDEM achieves these goals by implementing programs to increase public awareness about threats and hazards, coordinating emergency planning, providing an extensive array of specialized training for emergency responders and local officials, and administering recovery and hazard mitigation programs within the State of Texas.

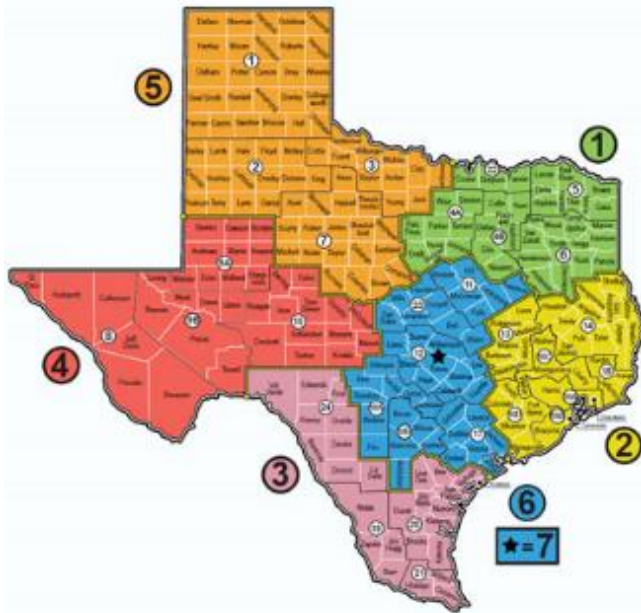
### **TDEM Field Response Personnel and Districts**

TDEM District Coordinators are the field response personnel stationed throughout the State and have a dual role as they carry out both emergency preparedness activities and coordinate emergency response operations. In their preparedness role, District Coordinators assist local officials in carrying out emergency planning, training, and exercises, and develop emergency teams and facilities. In their response role, District Coordinators deploy to incident sites to assess damage, identify urgent needs, advise local officials regarding state assistance, and coordinate the deployment of state emergency resources to assist local emergency responders.

District Coordinators are responsible for the preparedness and response duties within their specific region. These regions are identified on the below:



**Figure 9-2: Texas Division of Emergency Management Preparedness Units**



### TDEM Preparedness Units

TDEM, in administering the statewide emergency management and preparedness program, has divided duties and responsibilities among the following Preparedness Units:

- (a) Exercise Unit. The Exercise Unit provides support to local jurisdictions, regional and state level agencies, and Voluntary Organizations Active in Disaster to design, conduct, and evaluate emergency exercises at all levels.
- (b) Plans Unit. The Plan Unit develops and maintains state-level emergency plans, promulgates state standards for local emergency management plans, assists cities and counties in developing emergency plans, and reviews more than 2,000 local plan documents each year for compliance with state planning standards.
- (c) Technological Hazards Unit. The Technological Hazards Unit coordinates State efforts to enhance the emergency preparedness and response capabilities of communities throughout Texas for disasters that may include hazardous materials, industrial pollution, nuclear radiation, toxic wastes, dam failures, transportation accidents, factory explosions, fires, and chemical spills.
- (d) Training Unit. The Training Unit manages and delivers a diverse curriculum of emergency management and hazardous materials training for state and local emergency responders, state, local, and regional officials, and volunteer groups active in disasters.
- (e) Continuity of Operations Unit. The Continuity of Operations Unit serves as the subject matter expert for continuity of operations planning within the state. This unit develops, articulates and maintains strategy and continuity procedures, facilitates training workshops for federal, state, and local government organizations and develops continuity policy and procedures.

## **Mitigation Unit**

The Mitigation Unit of TDEM is responsible for maintaining the State Hazard Mitigation Plan, reviews local mitigation plans, and provides hazard mitigation training for local officials. In the aftermath of major disasters, members of this unit deploy to the Joint Field Office (JFO) to set up disaster recovery operations and coordination planning for post-disaster mitigation programs with federal counterparts and local officials.

TDEM's Mitigation Unit also administers The Pre-Disaster Mitigation Grant Program (HMGP) and Hazard Mitigation Grant Programs to provide Federal grant funding to cities, counties, and other governmental entities to carry out local and regional hazard mitigation programs. These programs, also known as 404 Mitigation, are funded by FEMA and administered by the State of Texas. These grants are designed to (1) prevent or reduce future loss of lives and property through the identification and funding of cost-effective mitigation measures and (2) minimize the costs of future disaster response and recovery.

## **Texas General Land Office**

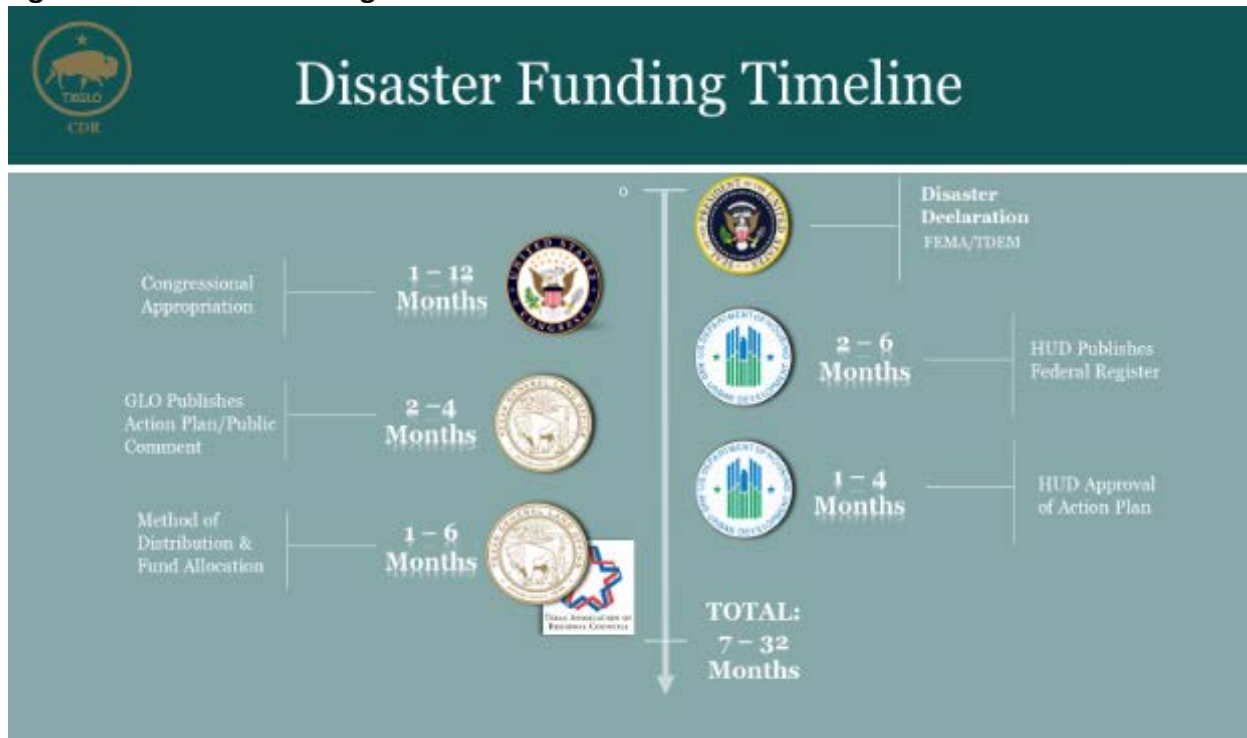
The Texas General Land Office is the state agency primarily responsible for the administration of Community Development Block Grant funds allocated for Disaster Recovery purposes (CDBG-DR Funds) after a Presidentially Declared Disaster in the State of Texas. Since officially taking over these responsibilities, the GLO has helped impacted communities utilize \$3.9 billion in CDBG-DR funds to aid in the recovery from Hurricanes Rita, Ike, and Dolly, 2011 wildfires, and 2015 and 2016 flooding events.

## **Disaster Recovery Funding**

### **Introduction**

The Community Development Block Grant Disaster Recovery Program (CDBG-DR) is conducted by the U.S. Department of Housing and Urban Development (HUD) and the Texas General Land Office's Community Development and Revitalization Program Office (GLO-CDR). The CDBG-DR Program was designed to aid cities, counties, and States in their recovery from Presidentially-declared disasters by creating policies and procedures for to govern the administration of federal funding allocated via special Congressional appropriations. The overall funding process and timeline is presented below.

Figure 9-3: Disaster Funding Process and Timeline



### Disaster Funding Process and Timeline

- Major Disaster Declaration issued by the President of the United States;
- Up to twelve months after the Major Disaster Declaration, Congress may appropriate disaster recovery funding;
- Between two and six months after Disaster Recovery funds have been appropriated by Congress, HUD publishes, through the Federal Register, how those funds are to be allocated for impact areas and specific rules to govern those allocations;
- Once funds have been allocated, the GLO is given 90 days to draft an Action Plan outlining the proposed usage of those funds for HUD approval;
- Once submitted to HUD, the initial review process may take up to 45 days with the potential for a delay should HUD reject the initial Action Plan draft and require a second submittal with certain alterations;
- Once an Action Plan has been approved by HUD, the GLO has up to six months to work with impacted communities in determining the best Method of Distribution and Fund Allocation to address the disaster recovery needs within each impacted community; and
- Following the Method of Distribution process, the GLO works closely with impacted communities to implement programs to complete approved disaster recovery projects.

### Eligible Activities

In determining whether projects are eligible for grant fund award, the GLO must document that the proposed project meets one of the following HUD designated criteria:

- 1) Funds are allocated to address a need that is directly related to the damage caused by the Presidentially Declared Disaster;
- (2) Funds are allocated to address a need that meets an established National Program Objective<sup>37</sup>; or
- (3) Funds are allocated to address a CDBG-DR eligible activity.

Unless waived by HUD, 70% of the aggregate of all CDBG-DR funds must be utilized in a manner that benefits the Low- and Moderate-Income population in the disaster impact area.

Funding may not duplicate activities paid from FEMA, the Small Business Administration, the U.S. Army Corps of Engineers, or any other funding source identified under the law. All allocations of CDBG-DR funds will, through the publication of the Federal Register, outline specific regulations pertaining to each appropriation including percentage splits between housing and infrastructure activities.

### **General Land Office Long-term Residential Activities**

In utilizing CDBG-DR funds for the benefit of impacted single-family homeowners, the GLO may utilize any of the following program types:

- (1) Rehabilitation. CDBG-DR funds may be used to finance the repair or restoration of housing units in disaster-impacted areas to applicable construction codes and standards and may include any of the following:
  - Privately owned buildings and improvements for residential purposes;
  - Improvements to single-family residential property which is also used as a place of business; or
  - Manufactured housing when such housing constitutes part of the community's permanent housing stock.
- (2) Reconstruction. CDBG-DR funds may be utilized for the demolition and re-building of stick-built or modular housing units on the same lot in substantially the same footprint and manner.
- (3) New Construction. CDBG-DR funds may be utilized to fund new construction of units if the activity clearly addresses a disaster-related impact and is located in a disaster-affected area.
- (4) Down Payment Assistance. CDBG-DR funds may be utilized to provide housing assistance in the form of counseling on the home purchasing and financing process and cash subsidies for down payments. Eligible applicants and properties are determined on the program level and must comply with all federal regulations.
- (5) Homeowner Reimbursement. Expenses incurred by homeowners for repairs to a primary residence prior to application of funds for other programs may be eligible for reimbursement up to an amount specified by the GLO.

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<sup>37</sup> (1) Benefitting low- and moderate-income persons; (2) Aiding in the prevention of slums or blight; or (3) Meeting a need that has particular urgency.

- (6) Buyouts. Buyout programs support hazard mitigation, floodplain management goals, and resiliency by removing homeowners from the floodplain and eliminating the risk of future flood vulnerability.
- (7) Resiliency Measures. Beyond the above-listed programs, the GLO will also seek to incorporate home resiliency solutions which may include the following:
- Elevating the first floor of habitable area;
  - Breakaway ground floor walls;
  - Reinforced roofs;
  - Storm shutters;
  - Use of Energy Star appliances and fixtures; and
  - Mold and mildew resistant products.

### **General Land Office Infrastructure Activities**

The GLO, in utilizing CDBG-DR funds, has continually fostered coordination between federal, state, local, private, and nonprofit sources to assist impacted communities in developing infrastructure projects that may include the following:

- Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements;
- Clearance, demolition, and removal of buildings and improvements; and
- Repair of streets, sidewalks, parks, playgrounds, publicly owned utilities, and public buildings.

### **General Land Office Planning Activities**

CDBG-DR funds may be utilized for planning activities to include gathering data, conducting studies, analysis, and preparation of plans and identification of actions that may implement such plans. These activities may include, but are not limited to, the following:

- Comprehensive plans;
- Community Development plans;
- Functional plans to include:
  - Housing;
  - Land use and urban environmental design;
  - Economic Development;
  - Open space and recreation;
  - Energy use and conservation;
  - Floodplain and wetlands management;
  - Transportation;
  - Utilities; and
  - Historic preservation.

## Previous Planning Studies

Storm Surge Suppression Study -The Gulf Coast Community Protection and Recovery District (GCCPRD) utilized \$7.3 million in CDBG-DR planning study funds to investigate available options to reduce the vulnerability of the Texas coastline from hurricane surge and flood damages. This study was conducted in accordance with the standards set forth by the Army Corps of Engineers and yielded valuable recommendations for future hazard mitigation.

Colonia Drainage Study - The Texas Water Development Board and authorities in the Lower Rio Grande Valley utilized \$3.9 million in CDBG-DR planning study funds to develop an effective drainage plan to remedy issues faced from flooding caused in the wake of Hurricane Dolly.

Coastal Resiliency Study - The GLO has utilized \$2.1 million in CDBG-DR planning funds to conduct a study that identifies physical elements, including infrastructure and natural resources, to determine the effectiveness of past recovery projects along the Texas Coastline.

## Current Planning Studies

To date, \$5.5 million in CDBG-DR planning study funds, specifically related to Hurricane Harvey allocations, has been made available to potentially fund the following studies:

- (1) Hurricane Impact Study – Texas A&M Galveston
- (2) Disaster Impact Visualization Study – University of Texas
- (3) Disaster Economic Impact Study – McCombs School of Business

## General Land Office Economic Development Activities

CDBG-DR funds may be utilized for a wide range of Economic Revitalization Activities within impacted communities. These activities include any activity that demonstrably restores and improves the local or regional economy and are not limited to activities that create or retain jobs.

In response to prior disasters, the GLO has coordinated efforts with impacted communities to conduct economic development activities to include the following:

- Provision of loans and grants to businesses;
- Provision of funding for job training;
- Building of educational facilities to teach technical job skills;
- Making improvements to commercial or retail districts in the impact area; and
- Financing other efforts that attract and retain workers in devastated communities.

Beyond this list, CDBG-DR funds are permitted to be utilized in the form of direct assistance to a small business<sup>38</sup> or a business that can demonstrate that the usage of grant funding is reasonable and critical to long-term recovery.

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<sup>38</sup> Small business as defined at 15 U.S.C. 632(a)

## **Texas General Land Office and FEMA**

Up and until Hurricane Harvey made landfall, the GLO was tasked with ensuring all CDBG-DR funds were utilized to implement long-term recovery programs in disaster impacted areas in a manner that complied with federal law. Although this fact remains, the large-scale impact of Hurricane Harvey warranted an unprecedented GLO-FEMA partnership to effectively and efficiently administer what have historically been FEMA operated response programs. This partnership included the merging of oversight and implementation roles to ensure that several forms of Direct Temporary Housing Assistance were made available to disaster victims in the most efficient way possible.

### **FEMA Partnered Short-Term Residential Activities**

On September 14, 2017, Texas Governor Greg Abbott designated the GLO as the state agency to partner with FEMA in leading short-term housing recovery programs. These programs were intended to provide direct housing solutions for some permanent repairs and offer temporary housing solutions to other applicants deemed eligible by FEMA. The following sections provide a very rudimentary overview of the programs implemented through this partnership.

### **Multi-Family Lease and Repair**

The Multi-Family Lease and Repair Program permits the GLO or its subrecipient to repair or improve existing multi-family housing structures. By accepting program funded repairs and improvements, property owners agree to lease a defined percentage of units to eligible disaster victims for up to 18 months after the disaster declaration. This program is not intended to repair or improve individual housing units, but allows for the repair or improvement of existing multi-family housing which the GLO may then utilize as a temporary housing resource for eligible applicants.

### **Direct Lease**

The Direct Lease Program enables the GLO or its subrecipient to enter into leases on behalf of FEMA or on behalf of eligible applicants to utilize properties that would typically not be available to the public. This program seeks to utilize housing outside of the general public market, like corporate housing or certain types of vacation homes, to increase the stock of option available to eligible applicants.

### **Manufactured Housing Units**

The Manufactured Housing Program allows for the provision of Manufactured Housing Units for eligible applicants to provide temporary housing for those who are unable to make use of financial temporary housing assistance due to a lack of available housing resources.

## **Recreational Vehicles**

The Recreational Vehicle Program allows for the provision and placement of Recreational Vehicles to eligible applicants to provide temporary housing to those who are unable to make use of financial temporary housing assistance due to a lack of available housing resources.

## **Direct Assistance for Limited Home Repair (DALHR)**

The DALHR Program allows for the provision of assistance to complete permanent partial repairs to homes with significant damage. Repairs, in accordance with the rules adopted during this particular implementation period, may not exceed the lesser of 50% of the home's fair market value or \$60,000.

## **Partial Repair and Essential Power for Sheltering (PREPS)**

The PREPS Program works with homeowners to complete temporary repairs on homes to permit applicants to occupy the structure while they await more permanent repair solutions. Temporary repairs may include window units for air conditioning and heating, establishing a functioning bathroom, and the installation of small cooking appliances. This program works to ensure that the applicant's home can serve as a safe and sanitary shelter for the home owner until more permanent solutions can be explored.

## **Harvey Data**

### **Introduction**

Hurricane Harvey made landfall along the Texas coastline on August 25, 2017, between Port Aransas and Port O'Connor as a Category 4 storm with sustained winds of 130 mph. During the four days that followed, Hurricane Harvey's wind speeds decreased, the storm stalled, and as much as 60 inches of rain fell over the impacted area. This record amount of rainfall, combined with the fact that Hurricane Harvey made landfall twice, created a three-event narrative for this disaster: (1) the initial landfall with sustained high winds in Aransas County; (2) the unprecedented rainfall in the Houston metroplex; and (3) a secondary landfall that caused massive flooding in Southeast Texas. In response to these events, Congress passed two separate appropriations bills which were then allocated by HUD to the state of Texas as follows:

- (1) On December 27, 2017, HUD allocated an initial amount of CDBG-DR funds in the amount of \$57.8 million to the state of Texas via 82 FR 247. For this particular allocation, HUD identified Harris County as 'most impacted and distressed' and required that at least 80% of the allocation be utilized to address unmet needs within the County. The remainder of this allocation, as determined by the GLO, was dedicated to Aransas, Nueces, and Refugio Counties for an affordable rental program.
- (2) On February 9, 2018, HUD allocated a secondary amount of CDBG-DR funds in the amount of \$5.024 billion. HUD identified the following counties and ZIP codes as most impacted and distressed: Aransas, Brazoria, Chambers, Fayette, Fort Bend, Galveston, Hardin, Harris, Jasper, Jefferson, Liberty, Montgomery, Newton, Nueces, Orange,



Refugio, San Jacinto, San Patricio, Victoria, Wharton, 75979, 77320, 77335, 77351, 77414, 77423, 77482, 77493, 77979, and 78934. Of this amount, HUD determined that Harris County and the City of Houston would receive direct allocations to implement disaster recovery programs within their respective jurisdictions.

### Impact Overview

The Texas General Land Office estimates that over 1 million homes were impacted by Hurricane Harvey with the state spending more than \$1.1 billion on response and recovery. As of February 2, 2018, the FEMA Public Assistance Program (PA) estimated damage costs at approximately \$29.2 billion. The FEMA Individual Assistance Program (IA) received over 896,000 applications for assistance and has disbursed over \$1.55 billion in housing assistance and other emergency related disaster assistance.

According to the Texas Legislative Budget Board, the state of Texas reports \$421.3 million in actual Hurricane Harvey related state expenditures for Fiscal Years 2017-2018 and projects an additional \$747.1 million in state expenses through Fiscal Year 2019.

As required, a needs assessment was completed to identify long-term needs and priorities for CDBG-DR funding. This assessment takes into account a comprehensive set of data sources that cover multiple geographies and sectors and includes specific details about the unmet needs for the eligible and most impacted and distressed designated counties. The following table outlines a summary of unmet need as originally included in the initially submitted Action Plan:

**Figure 9-4: Summary of Total Unmet Need for State Allocation Program Amounts**

Category	Unmet Need	% of Total Unmet Need	State Program Allocation Amount	% of State Program Allocation
Housing	\$24,040,632,591	15%	\$1,823,844,297	77%
Infrastructure	\$88,242,533,143	62%	\$435,605,083	18%
Economic Development	\$24,526,183,916	23%	\$105,363,344	5%
Total	\$316,809,349,916		\$2,364,812,724	

### Impact Demographics

The 49 CDBG-DR eligible counties affected by Hurricane Harvey cover 15%(39,496 square miles) of land area in the state and contain approximately 32% of the state’s total population (nearly 8.9 million Texans).

Of the 3.4 million housing units in the eligible counties, 62.5% are owner-occupied units. Some housing and income demographics are slightly different in the eligible counties versus the statewide averages. The 49 eligible counties have an estimated median owner-occupied housing unit value and median household income lower than the state as a whole. The median value of owner-occupied housing units is \$105,800, which is almost \$37,000 less than the statewide median value of \$142,700. The 49 eligible counties have a median household income of \$50,145, which is \$4,582 less than the statewide average of \$54,727. In addition to a lower median household income, the per capita income is also lower than the state as a whole. Approximately

## Disaster Recovery in Texas

14.9% of the population in the 49 eligible counties is living in poverty. This is just less than the statewide average of 15.6%.

By percentage, the 49 eligible counties have a higher African-American population when compared to the state as a whole. The 49 eligible counties have a 16.27% African-American population—approximately 3.67% higher than the statewide total. The minority population as a whole in all 49 eligible counties is approximately 62.21%—2.7% higher than the statewide total.

In the 49 eligible counties, veterans account for 4.9% of the population; the elderly account for approximately 11.73%; and disabled persons under the age of 65 account for 7.65% of the population. These numbers are in line with state averages.

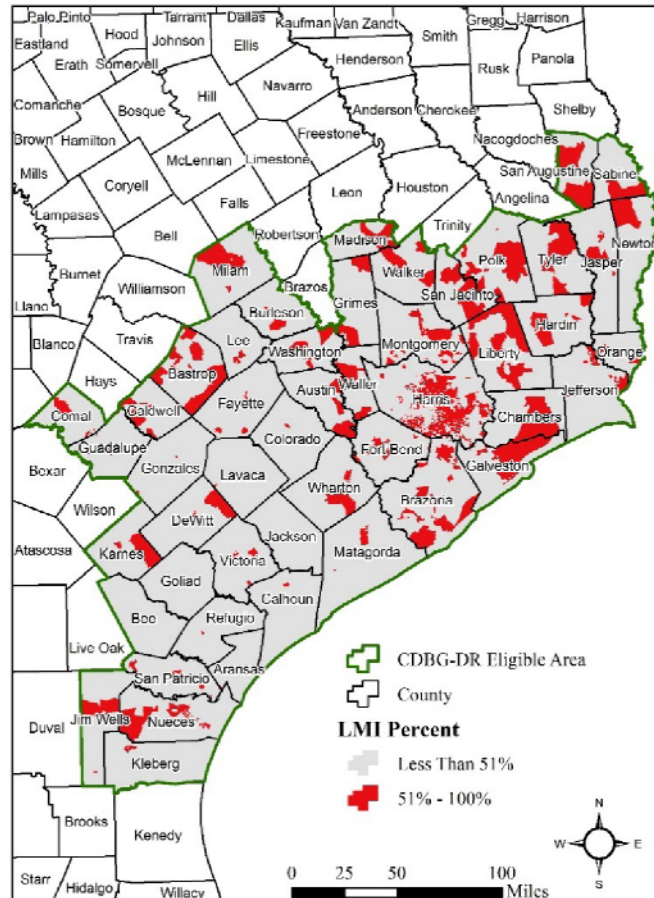
**Figure 9-5: 2016 Demographic Statistics for Texas and the 49 CDBG-DR Eligible Counties from the U.S. Census Bureau**

	<b>Texas</b>	<b>49 CDBG-DR Eligible Counties</b>	
<b>Fact</b>	<b>Estimates</b>	<b>Estimates</b>	<b>Percent of Area</b>
Population estimates, 2016	27,862,596	8,861,831	32% of Texas Population
Population, percent change - April 1, 2010, (estimates base) to July 1, 2016	10.80%	12%	
Persons under 5 years, percent, 2016	7.20%	645,145	7.28% of Eligible Population
Persons under 18 years, percent, 2016	26.20%	2,319,282	26.17% of Eligible Population
Persons 65 years and over, percent, 2016	12.00%	1,039,153	11.73% of Eligible Population
White alone, percent, 2016	79.40%	6,593,176	74.40%
Black or African American alone, percent, 2016	12.60%	1,441,957	16.27%
American Indian and Alaska Native alone, percent, 2016	1.00%	88,954	1.00%
Asian alone, percent, 2016	4.80%	565,728	6.38%
Native Hawaiian and Other Pacific Islander alone, percent, 2016	0.10%	8,875	0.10%
Two or More Races, percent, 2016	1.90%	163,599	1.85%
Hispanic or Latino, percent, 2016	39.10%	3,244,050	36.61%
White alone, not Hispanic or Latino, percent, 2016	42.60%	3,558,315	40.15%
Housing units, 2016	10,753,629	3,444,036	
Owner-occupied housing unit rate, 2012-2016	61.90%	2,152,669	62.5% of Housing Units
Median value of owner-occupied housing units, 2012-2016	\$142,700	\$105,800	
Median gross rent, 2012-2016	\$911	\$777	
With a disability, under age 65 years, percent, 2012-2016	8.10%	678,268	7.65% of Eligible Population
Median household income (in 2016 dollars), 2012-2016	\$54,727	\$50,145	
Persons in poverty, percent	15.60%	14.9% of Eligible Population	
Land area in square miles, 2010	261,231.71	39,496	15% of Texas

### Low- and Moderate-Income Analysis

The following map identifies census block groups that have low- and moderate-income population of 51 percent or more for the 49 eligible counties using HUD’s 2017 Low- and Moderate-Income Summary Data (LMISD) for the state of Texas.<sup>39</sup>

**Figure 9-6: Percentage of LMI Population by Block Group**



### Disaster Recovery Programs: Other Issues

The Texas General Land Office, as the primary administrator of CDBG-DR funds, has been able to identify how the following issues, when viewed through a disaster recovery lens, can impact the overall recovery process in impacted areas.

**Issue 1 - Not in My Backyard Syndrome can create barriers to housing choice for protected classes in some communities.**

The Texas General Land Office, through its administration of CDBG-DR programs, often encounters ‘Not in My Backyard Syndrome (NIMBY) related opposition from citizens residing in

<sup>39</sup> HUD Exchange. “FY 2017 LMISD by State - All Block Groups, Based on 2006-2010 American Community Survey.” Webpage accessed January 10, 2018. <https://www.hudexchange.info/programs/acs-low-mod-summarydata/acs-low-mod-summary-data-block-groups-places/>

or around where a proposed project is to be built. To effectively address the concerns of these citizens and combat the potential barriers to housing choice that NIMBYism can create, the GLO works to unify communities during the planning process through a robust citizen participation process as required under the law<sup>40</sup>. This process, depending upon the specific Federal Register requirements for each allocation, may include the following public participation processes and procedures for each proposed CDBG-DR project:

1. Publication of a proposed projects in a manner that affords citizens, affected local governments, and other interest parties a reasonable opportunity for examination<sup>41</sup>;
2. Notification of proposed projects to affected citizens through different mediums such as electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations; and
3. Holding public meetings in which citizens may air their concerns, receive structured feedback, and collaborate with other citizens in the area to determine the most effective and efficient means of project implementation.

In furthering a cohesive disaster recovery process, the GLO consults across multiple jurisdictions to particularly address issues and solutions that extend beyond the geographical impact area of individual projects<sup>42</sup>. By consulting with adjacent units of local government, agencies with metropolitan-wide planning responsibilities, and public housing authorities, the GLO indirectly combats NIMBYism by allowing all citizens to participate and have their concerns adequately addressed.

Additionally, the GLO works to create a more inclusive disaster recovery environment for all impacted citizens by implementing programs in compliance with an extensive list of federal requirements. The GLO must certify compliance with, at a minimum, the following for each program or project it undertakes

*24 CFR §570.602: Section 109 of the Act*

Section 109 of the Act requires that no person in the United States shall on the grounds of race, color, national origin, religion, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance made available pursuant to the Act. This provision also states that the prohibition against discrimination on the basis of age under the Age Discrimination Act and the prohibition against discrimination on the bases of disability under Section 504 shall apply to programs or activities receiving Federal financial assistance.

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<sup>40</sup> Citizen Participation requirements are published in detail in the Federal Register that corresponds with each allocation of CDBG-DR funding. Standards may also be found at 24 CFR §570.431(b) and 24 CFR §91.105.

<sup>41</sup> Publication efforts must meet the effective communications requirements found at 24 CFR §8 and other fair housing and civil rights requirements.

<sup>42</sup> 24 CFR §91.100(a)(4) and (5).

*Title VI of the Civil Rights Act of 1964*

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on a basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that are provided or the manner in which they are provided.

*The Fair Housing Act*

The Fair Housing Act protects people from discrimination based on race, color, national origin, religion, sex, disability and the presence of children when they are renting, buying, or securing financing for housing.

*Affirmatively Furthering Fair Housing*

Affirmatively Furthering Fair Housing (AFFH) requires that federal grantees further the purposes of the Fair Housing Act through the provision of an effective planning approach to aid program participants in taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

The GLO, in its' interpretation of current AFFH requirements under the law, has taken the step to conduct AFFH reviews in coordination with Texas Appleseed. This review process and all of its inner workings are being carefully crafted to ensure the most effective and efficient review process possible. To date, this review process will, at a minimum, include an assessment of the following as it relates to each project: area demography, socioeconomic characteristics, housing configuration and needs, education opportunities, access to public transportation, healthcare opportunities, and environmental hazards or concerns. It is the hope of the GLO that these reviews will present relevant data and establish solid reasoning to support the usage of CDBG-DR funds for certain recovery projects.

The GLO works to ensure that all policies, processes, and procedures associated with CDBG-DR Program implementation adequately reflect and adhere to, at a minimum, the above-listed provisions. Through effective usage of these provisions, the GLO fosters a more inclusive disaster recovery environment that actively combats NIMBYism.

**Issue 2 - There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements and programs to assist persons with disabilities and low-income residents.**

The GLO, as the primary administrator of CDBG-DR funds, is committed to providing technical assistance, at all levels of the grant administration process, to local governments, stakeholders, and the public. Often times, this technical assistance includes an educational aspect to provide all impacted parties with a basic knowledge of programs and the underlying laws that established them. This includes, but is not limited to, technical assistance for application processes, procurement processes, environmental processes, and overall grant administration.

The GLO's provision of grant administration-related technical assistance provides the greatest source of aid in terms of educating all grant participants in grant administration on fair housing requirements and programs that may directly impact low-income and disabled residents.

In the immediate aftermath of Hurricane Harvey, technical assistance was immediately offered by the GLO to impacted communities through a bi-weekly conference calls with local emergency personnel and elected officials. Beyond these calls, executive level leadership from the Community Development and Revitalization team, including Commissioner Bush, made repeated trips to the impacted areas. To date, the GLO has augmented staff and on-boarded more than thirty personnel, some of who are based locally in the impacted communities.

**Issue 3 - The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.**

The GLO, though not an agency that receives funding directly for the provision of general education and guidance on fair housing rights for everyday citizens, does undertake efforts to indirectly address this impediment to fair housing.

All CDBG-DR programs must be conducted in a manner that complies with, at a minimum, all of the following Fair Housing related laws:

1. 24 CFR Part 1: Nondiscrimination in Federally Assisted Programs of HUD<sup>43</sup>;
2. 24 CFR Part 3: Nondiscrimination on the Basis of Sex in Education Programs or Activities receiving Federal Financial Assistance<sup>44</sup>;
3. 24 CFR Part 8: Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development<sup>45</sup>;
4. 24 CFR Parts 91.325(a)(1): Affirmatively Furthering Fair Housing<sup>46</sup>; and
5. 24 CFR 570.487(b): Affirmatively Furthering Fair Housing<sup>47</sup>.

The GLO works to ensure that program participants are exposed to these statutes and the protections they afford by included each of these citations on applicable documents throughout the CDBG-DR administration process.

In terms of providing program participants with sufficient knowledge to obtain assistance in protecting their fair housing rights, the GLO is in the process of updating and reviewing policies and procedures to ensure that this information is adequately presented through programmatic paperwork and public outreach materials.

**Issue 4 - Protected classes may experience disparities in home mortgage loan denials.**

The GLO does not, to date, administer any federally funded disaster recovery programs that directly handle the approval or denial of home mortgage loans for disaster recovery applicants. It should also be noted that federal law prohibits the GLO from utilizing CDBG-DR funds for a forced mortgage payoff in instances where a homeowner with an outstanding mortgage is required, under the terms of their loan, to repay the balance of the loan prior to taking assistance to rehabilitate or reconstruct their home.

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<sup>43</sup> Implementing regulations for Title VI of the Civil Rights Act of 1964.

<sup>44</sup> Implementing regulations for Title IX of the Education Amendments Act of 1972.

<sup>45</sup> Implementing regulations for Section 504 of the Rehabilitation Act of 1973.

<sup>46</sup> Each State must certify that they will affirmatively further fair housing.

<sup>47</sup> Each state and local government must certify that it will affirmatively further fair housing.

Despite these facts, the GLO indirectly furthers fair housing objectives through its administration of direct temporary housing programs. These programs, Partial Repair and Essential Power for Sheltering and Direct Assistance for Limited Home Repair, provide very basic and minimal work to a disaster survivor's home to allow the homeowner to shelter in place for an extended period until more permanent repairs can be completed. By keeping homeowners in their homes, these programs prevent survivors from enduring the financial hardships associated with paying for a livable shelter while simultaneously paying on the mortgage for a home that is not deemed habitable. Overall, these programs work to help homeowners remain in good standing for current home mortgage loans which may prevent them from having to apply for a subsequent loan in the event of a default or home sale.

The GLO, as permitted through the Federal Register, may implement down payment assistance programs as a part of its CDBG-DR programs. Although this type of program would not be instituted for the sole purpose of furthering the fair housing objective listed in this impediment, it has the potential to influence any disparities in home mortgage denials for certain protected classes if there is a correlation between down payment availability and mortgage loan granting.

**Issue 6 - There are barriers to mobility and free housing choice for protected classes.**

The GLO, as the primary administrator of CDBG-DR funds, has made efforts to address any potential barriers to mobility and free housing choice for protected classes.

The GLO may, in coordination with impacted communities, implement disaster recovery programs and projects that may result in the acquisition of real property and/or the displacement of persons from their homes, businesses, or farms. When these types of situations arise, the GLO utilizes policies and procedures that align directly with the Uniform Relocation Act to emphasize the following:

- Provision of uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects;
- Ensuring relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement;
- Ensuring that no individual or family is displaced unless decent, safe, and sanitary housing is available within the displaced person's financial means;
- Aid in the improvement of housing conditions of displaced persons living in substandard housing; and
- To encourage and expedite acquisition by agreement and without coercion.

The GLO, in planning programs and projects, consistently ensures that adequate time, funding, and staffing are available to carry out certain responsibilities under the law. Some of those responsibilities, as listed by program or project type, are as follows:

*Real Property Acquisition*

- Appraisal of the property before negotiations;
- Inviting the property owner to accompany the appraiser during the property inspection;
- Providing the owner with a written offer of just compensation and a summary of what is being acquired;



## Disaster Recovery in Texas

- Payment for the property before taking possession; and
- Reimbursement expenses resulting from the transfer of title such as recording fees, prepaid real estate taxes, or other expenses.

### *Residential Displacements*

- Providing relocation advisory services to displaced tenants and owner occupants;
- Providing a minimum of 90 days written notice to vacate prior to acquiring possession; and
- Reimbursement of moving expenses.

### *Nonresidential Displacements (Businesses, Farms, and Non-Profit Organizations)*

- Providing relocation advisory services;
- Providing a minimum 90 days written notice to vacate prior to acquiring possession; and
- Reimbursement of moving expenses.

The totality of services listed above are offered to any and all citizens who may be impacted by a CDBG-DR project or program regardless of race, color, religion, national origin, sex, age, or physical or mental disability.

## Chapter 10 - Impediments to Fair Housing Choice

This chapter presents the “impediments to fair housing choice” identified in the research conducted while compiling this report. Research included not only the results of the extensive outreach and consultations described in Chapter 1 and then summarized in this chapter through the initial public participation process for the Analysis of Impediments (AI), but also the review of demographic characteristics and patterns which may influence housing choice captured in Chapter 2; the review of state-level laws, regulations, and programs related to housing development and choice for protected classes summarized in Chapter 3; the in-depth review of all 13 regions in Texas provided in Chapter 5; an evaluation of the race and ethnicity of participants in the Department’s programs and portfolio in Chapter 6; the statewide and regional analysis of 2016 lending activity in Texas based on race, ethnicity, and sex through the use of HMDA data in Chapter 7; and a review of fair housing complaints and trends from 2013 to 2018, and legal cases related to Title VI violations and the Federal Fair Housing Act in Chapter 8. It should be noted that any discussion of impediments specifically related to disaster recovery would be found in Chapter 9.

This AI was conducted at the statewide level and includes a review of regional and county trends. Given the size of Texas, it was not feasible, nor within scope, to analyze impediments at the level of local individual jurisdictions. The State includes fair housing requirements and protections in all contracting language with local subrecipients and in program rules. The State recognizes the importance of local decision making and the authority of local jurisdictions to respond to housing needs and programs in their community. Participating Jurisdictions (PJs) - which are jurisdictions so designated by HUD that receive CDBG, HOME, ESG, or HOPWA funds directly from HUD - are required by HUD to complete an AI. The data available in this report may be utilized for local AIs, where appropriate.

### Background and Definitions

According to HUD’s Fair Housing Planning Guide, “impediments to fair housing choice” are:

- “Actions, omissions or decisions *taken* because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choices or the availability of housing choices.
- Actions, omissions or decisions *which have the effect of* restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.” [emphasis added]

Further, there are three components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.
2. An impediment must have a disproportionate effect on a protected class.
3. An impediment must be caused by an “action, omission or decision.”

Through the comprehensive review noted above, some of the identified potential barriers or symptoms of barriers to housing choice could not be clearly linked to one or more protected

classes or a particular action, omission, or decision. These potential barriers do not fall within HUD's definition of "impediment," but have been noted in this document.

Finally, it must be noted that the definition and description of "impediments to fair housing" in the HUD Fair Housing Planning Guide do not contemplate significant developments in the law since the Guide's publication. In particular, the Supreme Court's opinion in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015) (ICP), is controlling on the issue of sufficiency of statistical evidence to make a *prima facie* case of disparate impact discrimination under the Fair Housing Act. In ICP, the Court adopted a standard that requires the plaintiff identify a particular facially neutral practice, prove a robust causal connection between the identified practice and the claimed disparate impact, and demonstrate that the disparate impact causes a barrier to housing. See ICP, 135 S. Ct. at 2523. The information presented in this chapter is not sufficient to satisfy the ICP standard, and no practice or policy described in this section is being identified as creating a barrier to fair housing under the current U.S. Supreme Court standard. Accordingly, any statements regarding "impediments to fair housing choice" or "impediments," generally, within this Analysis of Impediments, are expressly denied as constituting a practice or policy that is the cause of discrimination under the Fair Housing Act.

### **Fair Housing Input Gathered through Public Consultation**

Throughout the preliminary consultation period, feedback was robust and varied. In many cases, specific issues were only reported in certain localities or regions, while some were identified by many groups statewide. In an effort to maximize the type of input received by attendees and participants in consultations, TDHCA set up most of the consultations in three parts. First, attendees were asked for their open-ended input, as many who attended had something specific planned to say, or an experience they wanted to share. Second, a series of questions and prompts were provided to help open the floor to experiences, comments, and observations regarding fair housing issues. Examples of those questions included whether attendees had observed instances of prohibited discrimination in housing in their community; whether they felt that there were affordable housing options dispersed throughout their community; whether they felt that any specific zoning, building requirements, or land use or other policies that affect affordability and dispersion of housing, including affordable housing; how effective they believed their community was as it related to providing affordable, accessible housing for people with disabilities; and whether they felt people looking for housing and housing providers knew about fair housing laws. Lastly, the list of the impediments identified in the 2013 AI was distributed and attendees were asked to review the list and discuss how the impediments identified in 2013 relate to their community now and whether those impediments still exist.

The input received in the consultations was insightful and informative to the development of the impediments identified in this AI. It must be noted that comments and input received through this consultation process, and reported here, are the views and observations only of those who made the comments, and not conclusions or statements of fact by the State of Texas. The following categories represent some of the most common themes encountered around the state and the observations that fed into those overarching themes.

## Fair Housing Education

Input was received on the need for increasing and improving fair housing awareness and education at nearly all consultations – those across the state and those that were subject matter specific. There was a strong sense of agreement across the state that insufficient awareness and education about fair housing continues to be a major barrier to fair housing protections. This input covered education and a lack of education and awareness regarding fair housing laws, rights, and duties available to the public, housing providers, and local governments.

- Members of the housing development community provided input on key areas for improved education. When asked several specific questions about more recent HUD rules and guidance (HUD's 2016 final rule on Quid Pro Quo and Hostile Environment Harassment and Liability for Discriminatory Housing Practices under the Fair Housing Act), there was a lack of familiarity with these newer rules. Additionally, property management companies discussed the challenge they face in retaining well-trained staff, and that high turnover makes it challenging to be sure those working face to face with clients are fully informed of fair housing protections and how to handle reasonable accommodations appropriately.
- Consultation input and members of TDHCA's Disability Advisory Workgroup (DAW) provided input on the continued need to educate developers and property managers on fair housing laws and protections, especially relating to reasonable accommodations and modifications.
- Persons working on homelessness issues discussed the need to train housing providers and individuals on the reasonable accommodation process for accessing shelters and housing.
- Input from the consultation with the Texas Interagency Council for the Homeless (TICH) identified a need for more education, specifically for persons with behavioral health issues to be sure they fully understand their rights, how to advocate for themselves, and how to access housing. This was expanded upon to suggest that it would be beneficial to educate those who work with individuals experiencing homelessness and individuals with behavioral health disabilities, so that they can in turn assist their clients.
- Comment was made in the consultation with stakeholders in Brownsville that housing navigators may lack the capacity, training, and expertise to identify possible discrimination. Similarly, feedback was received from the housing navigators in Brownsville stating that they lack capacity, training, and expertise to identify possible fair housing lending discrimination.
- Developers noted that disability was the most challenging fair housing issue for properties to navigate because of the wide range of individual requests.
- Feedback was received at several public consultations on the need for education and training around assistance animals, service animals, and emotional support animals, specifically related to the Fair Housing Act and HUD guidance.
- Commenters at several consultations expressed the desire for more assistance to be provided in helping persons file complaints about discrimination.

## Impediments to Fair Housing Choice

- Stakeholders mentioned the need for property and tenant education on the Violence Against Women Act (VAWA) of 2013, specifically that VAWA eligibility is not linked to one sex or gender and offers potential protections relating to poor credit and/or rental history.
- Stakeholders and tenants' rights organizations expressed concern over alleged threats of retaliation and intimidation by leasing managers after individuals filed a fair housing discrimination complaint.
- Commenters in Abilene also felt that financial literacy education was important in removing barriers to accessing affordable housing.
- It was suggested across several forums that TDHCA's Compliance Monitoring staff should provide more education and assistance to property staff in the reasonable accommodation process and when developing their tenant selection plans.

### **Possible Fair Housing / Fair Lending Discrimination**

When asked to share instances of discrimination in their community that participants had experienced themselves, or were aware of, a variety of input was received. Examples of discrimination varied from local zoning to concentration of accessible housing, to "Not In My Back Yard" sentiments, referred to as NIMBYism. Some of the comments received are provided below.

- Concerns were raised in Brownsville regarding the targeting of high cost loans, with 14-18% interest rates, to immigrants. One stakeholder noted that manual underwriting can be successfully used to assist households unlikely to qualify for conventional lending products. Stakeholders expressed the belief that these households are more likely to be members of protected classes.
- Concerns of steering were discussed in several communities, which occurs when individuals are directed to visit – or not to visit - specific properties and neighborhoods; the examples given were indicated to be based on the income level of the individual, which is not a protected class in Texas.
- Similarly, stakeholders noted that Housing Choice Voucher recipients consistently experience obstacles in finding housing providers that will accept vouchers. In addition, some properties had income qualifying criteria requiring a household with a voucher to have an income 2 to 3 times the total rent amount, not 2-3 times the tenant portion of the rent. As with the comment above, these issues were tied specifically to income, which is not a protected class, however they may have a disproportionate effect on certain protected classes.
- NIMBYism was discussed in several consultations. A specific example was shared regarding a proposed affordable housing development in San Antonio, where current residents neighboring the proposed site raised concerns of race, familial status and the presence of children in the development, and perceived burdens to local schools. In Fort Worth, a stakeholder mentioned that the social media platform Nextdoor was used as a mobilizing point for NIMBYism. Developers of affordable housing affirmed that this still is one of the most significant issues they face in trying to locate potential sites for affordable housing developments. The requirement for public housing authorities in Texas to hold public meetings on proposed housing developments can rally opposition and may result

## Impediments to Fair Housing Choice

in fewer sites being considered, thereby potentially decreasing choice for current and prospective tenants.

- Consultations in Denton and Lewisville revealed concern regarding local decision making in the form of zoning requirements and city councils' ability to vote against affordable projects funded through TDHCA's Housing Tax Credit (HTC) Program. This was perceived as being exacerbated by the fact that Texas statute prohibits inclusionary local zoning<sup>48</sup>.
- Input received from the Texas Low Income Housing Information Service (Texas Housers) commented that they believe discrimination occurs when HTC Program properties are concentrated in racially segregated, high poverty, and dangerous neighborhoods.
- Texas Housers provided their opinion that the allocation of the \$5 billion Community Development Block Grant (CDBG) Disaster Recovery funds being targeted to help homeowners, thereby allegedly creates a disparate impact on people of color and renters in disaster areas.
- Texas Housers also shared their belief that public housing destroyed by Hurricane Ike has still not been rebuilt in some areas, as they had expected from the Fair Housing Conciliation Agreement at that time, which is allegedly further depleting the affordable housing supply in Ike affected areas.

### Housing Needs

Examples of housing needs were discussed statewide and consultations indicated broad support for addressing needs, while providing excellent examples of specific types of needs. Some of the comments received are provided below.

- The need for more affordable housing stock was discussed at 15 different input sessions. Feedback varied from affordable housing stock not being well dispersed within communities to rising rental rates that exceed Fair Market Rents (FMRs). Rental costs that exceed FMRs can make finding units for voucher holder particularly challenging.
- Comments were made regarding the rising costs of rent and housing.
- The need for a variety of accessible, integrated housing units to meet the needs of people with disabilities was discussed at ten different input sessions and is a common and repeated theme at TDHCA's consultations with the DAW.
- Inaccessible local infrastructure and sidewalks around affordable housing were noted in consultations.
- Accessible housing in Brownsville was noted to be concentrated in HTC Program properties.
- Concerns were raised about older adults being priced out of their homes due to cities and developers not addressing the needs of these households. While age is generally not a protected class in Texas, there is a higher incidence of disability among older populations.

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<sup>48</sup> Texas Local Government Code Section 214.905

## Impediments to Fair Housing Choice

- Feedback was received on the need for substance abuse facilities and recovery homes. Specifically, NIMBYism was identified as a cause for recovery homes, such as Oxford Houses, being prevented from opening in Texas.
- In several areas it was noted that short-term rental assistance is needed to be able to assist with rent for one to two months.
- One stakeholder noted that the complexities of utilizing the Tenant-Based Rental Assistance Program through TDHCA's HOME Investment Partnerships Program (HOME) are administratively burdensome.
- Statewide, commenters noted that affordable properties frequently have strict credit history and rental history requirements that makes the denial rate high for many individuals whose income relies on Social Security Insurance (SSI) or Social Security Disability Insurance (SSDI).

### Location Needs and Preferences

Some of the examples of needs were specific to certain areas or discussed issues and concerns regarding the location of housing. Some of the comments received are provided below:

- There is a need for access to supportive services and to amenities such as grocery stores. This highlights a connection between affordable housing location and ability to access supportive services and amenities.
- Specific feedback received in El Paso suggested that people are choosing to live in 'poor housing situations' to be close to public transportation.
- A stakeholder noted that their local participating jurisdiction does not prioritize its federal housing funds for affordable, accessible housing, but supports homeowners. However, this creates a challenge because TDHCA's HOME funds are not generally available in participating jurisdictions to offset that.
- Stakeholders in Fort Worth mentioned that many of the most accessible locations are in the lowest income neighborhoods that tend to have high crime rates.
- Additional challenges exist in rural areas to fulfilling the housing and service needs of persons with disabilities and persons experiencing homelessness, providing a variety of housing options, and linking residents to services which may be located far away.
- Input indicated that there is inadequate investment in infrastructure in low income communities.
- Stakeholders for the Houston area noted that Houston still maintains open ditch drainage systems in some minority communities, highlighting sub-standard public services that impact minorities more than non-minorities.
- Stakeholders in Brownsville report high rates of flooding and poor drainage in colonias, and that disasters have a disproportionate impact on those communities.
- Allocations of disaster recovery funds do not adequately account for the loss of rental housing stock. Additionally, renters in Texas are more likely to be households of color, causing a disproportionate impact on people of color in disaster impacted areas.

## Impediments to Fair Housing Choice

- Stakeholders in disaster-impacted regions mentioned that disaster recovery efforts in disaster-impacted areas need to recognize and address the impediments identified in the 2013 State of Texas Analysis of Impediments to Fair Housing Choice.
- Comments at the disaster recovery consultation indicated that the State needs to meet affirmatively furthering fair housing obligations, and hold subrecipients accountable to their AFFH duties with disaster recovery funds.

### **Criminal Records**

A common issue that arose across many of the consultations was the increasingly apparent role that criminal history has on an individual's ability to find safe, affordable rental housing. Obstacles related to criminal history were the most recurrent issues discussed during public input sessions. While criminal history is not a protected class, HUD has released guidance that an individual may have cause under the Fair Housing Act for actions related to criminal history. Some of the comments received are provided below:

- A significant proportion of individuals with criminal records are members of one or more protected classes and are often blocked from accessing affordable housing, compounding their challenges with reentry.
- Long wait lists for the few properties and programs that will accept people with criminal records exacerbate their unmet housing needs, increasing their likelihood of entering into homelessness. Criminal history was also mentioned as a barrier to entry to some shelters.
- In strong rental markets where properties achieve full occupancy readily there is no incentive for properties to provide flexibility or work with someone with a criminal history.
- Several examples were given of individuals being denied because of very old criminal histories. Some properties allegedly have a lifetime look-back period. Feedback from the TICH noted that property managers don't know what an appropriate look-back period is and they don't know what type of offenses to look for.
- In addition to examples of individual cases of denial due to criminal histories, property owners and managers noted that the lack of clarity in the HUD guidance on criminal backgrounds makes it more challenging to try to implement changes because it is not clear that changes they make will be sufficient. Developers expressed that there are a lot of gray areas with too much subjectivity around the topic of tenant criminal history. It was suggested that more training on HUD's guidance would be helpful.
- Some commenters suggested that it may be nearly impossible for sex offenders to find housing.

### **Tenant Survey**

In 2017, TDHCA conducted a tenant survey which asked questions about the preferences of persons living in TDHCA-monitored properties. While the survey results provide insight into respondent preferences, it is important to note that senior household respondents were over-represented in the survey responses and the results should not be considered reflective of the overall portfolio or of all residents. Approximately half of residents surveyed indicated that they



would prefer to live in a different neighborhood than the one they currently reside in. Nearly all respondents stated their location preferences were determined by the proximity to services and amenities, as well as low crime and high aesthetic appeal. A more detailed breakdown of the results of the tenant survey can be found in Appendix I

### **2019 Impediments to Fair Housing Choice**

Based on the research conducted in Chapters 1 through 8 and the results of the consultations noted above, statewide impediments to fair housing choice have been identified below. To the extent any impediments have been identified that are specific to disaster recovery activities and/or disaster-affected counties, those discussions would appear in Chapter 9.

The impediments are not provided in any particular order of priority and impediments are not intended to be compared against one another. Impediments listed affect protected classes differently. For example, the reasonable accommodation process serves persons with disabilities, not all protected classes. After each impediment the basis for that impediment is provided. Discussion of strategies and actions for mitigating these impediments is found in the Conclusions and Recommendations in Chapter 11.

Texas state agencies participating in HUD Community Planning and Development (CPD) programs have a limited role in causing—and eliminating—impediments to fair housing choice. Many of the trends identified in this research document were not the cause of a state level action, omission, or decision and moreover, are not something that is readily achievable given the limited available resources within CPD administrative funds, the constraints of working with those programs subject to the rule, and the limitations of the State’s jurisdictional authority. However, the State acknowledges its role in affirmatively furthering fair housing choice for all Texans.

#### **Impediment 1: Not in My Backyard Syndrome (“NIMBYism”) can limit affordable housing development, which could limit housing choice for protected classes in some communities.**

NIMBYism is generally characterized by opposition to a proposed development from community members in close proximity to a site proposed for the development of affordable housing. Community members may support the idea of affordable housing, but oppose the specific location or construction of a specific development; or community members are not opposed to all developments or a specific development, but do not want specific populations of people in the development that they perceive to be undesirable for their neighborhood. NIMBYism could create fair housing impediments when exclusionary attitudes and actions have the effect of limiting housing opportunities for protected classes, even if actions and attitudes are directed primarily towards concerns over alleged issues like traffic, property values, and school overcrowding as opposed to overt discrimination against protected classes.

However, if those same issues (traffic, etc.) would not prevent a market rate property from being developed, then there should be limited mechanisms by which those issues should be able to prevent an affordable property from being developed. One attendee at the Houston consultation

session stated, “One of the things that you're finding is, the people who are against something get organized very well, and the people who need the service ... they're not connected, they're not organized.” NIMBY groups can be very organized and well-resourced; as noted in the comment summary provided above, social media has made activism against a property increasingly easy to mobilize. Those presenting the NIMBY perspective can also be very educated and savvy; they realize that they will be less effective if they focus on the root cause of their concern, not wanting certain populations in their neighborhood, and instead may present issues such as water drainage, school overcrowding, and emergency service availability as more primary causes for concern.

Although NIMBYism is usually associated with the concerns and actions of community residents, the policies and practices of government entities can also be perceived as having a NIMBY effect. When local land use and zoning decisions are made that are responsive to local opposition and NIMBYism, they may perpetuate or support the NIMBYism effect and limit the creation of affordable housing stock in diverse areas. Laws which on the surface pose no inconsistency with fair housing laws can create such situations. Examples include state laws allowing for local zoning and land use planning and for the permitting of boarding houses. There is always the possibility when local bodies attempt to enact these laws and regulations, significant local testimony with concerns and attitudes from constituents may give the governmental bodies direction to act in a manner not fully consistent with fair housing.

### **Basis for Identifying Impediment**

- As noted previously, NIMBYism was discussed as a continuing ongoing barrier in several consultations and consultation attendees shared experiences where local residents raised concerns to local government about race and familial status of potential tenants and concerns regarding the presence of children in proposed affordable housing.
- Developers provided feedback that many communities are typically more willing to support affordable housing deals for the elderly, which local residents appear to find more agreeable and easier to support than general population developments, which includes individuals and families.
- The preference for elderly only affordable housing developments, as opposed to affordable housing developments serving the general population, may result in affordable housing developers feeling pressure to take the path of least resistance to avoid the opposition. Developers expressed that they face a greater risk of their development being stopped when they push for the provision of general population housing. The consequence of the preference for elderly deals is that ultimately less general population housing is developed. For households with larger family sizes and persons with disabilities needing accessible units, the challenge to find an affordable unit may be even more difficult.
- Input received in several locations indicated that stakeholders felt that votes by local officials against developments, or against the required zoning for a development, are in effect NIMBYism. While very restrictive zoning can have the effect of limiting affordable housing, it may also be limiting market rate multifamily housing.

## Impediments to Fair Housing Choice

- NIMBYISM can be linked to homeowner associations' rules and regulations that may have policies concerning unsupervised children that may conflict with fair housing laws.
- Applications for funding from the Department or other entities often require applicants to notify local and state officials and nearby neighborhoods, and may have points or award incentives for support from such officials and organizations. Constituents who are opposed to such developments can effectively prevent them from being funded through submission of opposition letters or the absence of letters of support.
- NIMBYism could lead to subtle patterns in otherwise lawful zoning. Hypothetically, over time, a city may adopt a series of small changes to zoning laws, such as lot size minimum restrictions on new construction, square footage minimums on new construction, unit size restrictions in new rental construction, and room size minimums in rental units. Individually, each of these zoning changes would seem innocuous. But taken as a whole, the only housing units that could be built within those limitations are houses on large lots with large room sizes that lower income families may not be able to afford.
- Testimony was provided at the Senate Committee on Intergovernmental Relations interim hearing in Pharr, Texas, on May 31, 2018, that raised concerns that NIMBYism is keeping affordable housing from going "where it should be going" and noted that this appeared contrary to fair housing protections.
- Broad-based opposition to affordable housing may be expressed in terms of concerns over crime, property values, school overcrowding, and traffic, however, if successful, it could pose obstacles to the creation of affordable housing opportunities, including opportunities for persons in protected classes.
- NIMBYism can trigger opposition to "sober homes" for persons recovering from substance abuse, as shown in comments provided during consultations. Advocates noted the shortage of housing options to support persons recovering from drug and alcohol addiction; and posited that this issue is and will continue to be an increasing problem as Texas faces the opioid crisis.

### **Impediment 2: There is a lack of understanding of and awareness of resources on fair housing law, rights, and duties available to local governments, stakeholders, and the public about fair housing requirements and programs to assist low-income residents and persons with disabilities.**

This impediment recognizes the perception that there has been, and continues to be, a lack of general public understanding and awareness about fair housing laws, rights and responsibilities. This is an issue the State clearly has worked intensively on as reflected in the summary of actions taken in Chapter 4, however, the need to continue educational efforts has not diminished. A lack of understanding and awareness of fair housing law, rights, and duties can create an impediment when housing providers lack the knowledge needed to adequately respond to the needs of those requesting reasonable accommodations, or when housing consumers lack sufficient information to know and protect their rights

These educational needs are of two types:

- Those offering housing should fully understand their obligations; and

## Impediments to Fair Housing Choice

- Those seeking housing should be able to fully understand their rights and means of pursuing action if they believe their rights have been violated.

### **Basis for Identifying Impediment**

- Significant feedback was received on this impediment during the public consultation process.
- Based on conversations with developers, there is a need for continuing education on more recent HUD rules and guidance; without such training properties are not clearly able to know and understand how to proceed.
- There is a need for HUD to provide greater clarity and specificity around its recent criminal history guidance; developers indicated that the guidance prompted them to be more aware of the issue, but was not particular enough for them to make responsive policy changes.
- Housing providers, members of the DAW, homelessness advocates, and others expressed challenges in ensuring that properties understand the reasonable accommodation and modification processes, and that tenants know their rights and protections as it relates to accommodations and modifications. This challenge is reflected across Texas, as the Texas Workforce Commission's Civil Rights Division (TWC-CRD) reports that the majority of fair housing complaints involve the protected class of persons with disabilities. This is also consistent with national trends. Advocates for the homeless felt that training for shelter staff on reasonable accommodations needed to include access shelters and multiple commenters emphasized the need for behavioral health disabilities to be addressed. This training needs to include topics such as retaliation and intimidation by properties after the filing of a fair housing complaint.
- Disability advocates expressed the need for more assistance in helping persons file complaints about discrimination.
- Comment was made that housing counselors also need training specifically on fair housing and how to handle possible discrimination and accommodation.
- Feedback was received on the need for education and training around assistance animals, service animals, and emotional support animals, specifically related to the Fair Housing Act and HUD guidance.
- Comment was made that there is a need for both property and tenant education as it relates to the Violence against Women Act of 2013 and enhanced understanding of the protections it offers.
- Feedback was received on the limited presence of fair housing testing in parts of the state outside of local Fair Housing Initiatives Program (FHIP) and Fair Housing Assistance Program (FHAP) service areas. Testing is one of the best methods to track and affect fair housing discrimination; however, it is difficult to conduct fair housing testing in rural parts of the state without a local FHIP or FHAP provider.
- Comment was received that additional education is needed on how to assist persons with Limited English Proficiency (LEP); someone who is not able to speak, read, write, or understand the English language at a level that allows them to access programs effectively. In Texas, the most prevalent LEP population is Spanish speakers. These

individuals may experience obstacles to access housing choice due to language barriers associated with national origin.

- It was suggested that working against NIMBYism includes education on fair housing and affordable housing, particularly the education of communities and local officials making decisions relating to proposed affordable housing.
- It was also suggested that education could assist in removing barriers to accessing affordable housing includes financial literacy education, which may allow a low income household, armed with such information, to access affordable housing opportunities.

### **Impediment 3: Protected classes may experience obstacles in accessing homeownership and lending products.**

Across Texas, there were approximately 455,000 applications for new loans for home purchase in 2016. Of those, 45,000 applications were denied by the lending institution. Not all of the remaining applications resulted in a loan origination; 127,000 applications were either withdrawn or loans were not taken out by the applicant, resulting in a total of nearly 283,000 loans being originated. This would indicate that more than one in 100 Texans, regardless of age or other demographics, secured a mortgage to purchase a home. Nationally, as reflected in a September 2016 article for the Federal Reserve Board: “Since 2006, the shares of home purchase loans originated to black and Hispanic borrowers have declined considerably. These declines have raised concerns about access to credit for minorities following the financial crisis, and whether banks are meeting their obligations under the Community Reinvestment Act to help safely make credit available throughout their communities. Demand-side factors could also be playing a role, such as differential unemployment growth by race and ethnicity or differential changes in preferences for homeownership since the housing bust.”<sup>49</sup>

Credit history and credit worthiness are critical pieces of one’s ability to access homeownership and lending products, and even a household’s ability to secure a rental unit. Numerous stakeholders at consultation sessions provided specific input on the need for financial literacy education to improve credit ratings for households seeking lending products. In addition, feedback was received on the obstacles renters with no or poor credit history and no or poor rental history face. Lenders traditionally respond to higher risk loans by charging higher interest rates and/or requiring more collateral. The 2016 HMDA dataset does not include information on credit worthiness to gauge risk to lenders and potential fair housing discrimination. Given the current limitations on reporting requirements, it is not possible to determine whether borrowers with similar credit risk were treated equally.

If protected classes have unequal access to lending products and/or are provided with loans at high interest rates more frequently than other applicants with similar risk profiles, such practices could limit immediate housing choices by preventing individuals from purchasing homes, potentially affecting their mobility and freedom of housing choice; charging more for homes;

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<sup>49</sup>Bhutta, Neil; & Ringo, Daniel. (September 29, 2016). Credit Availability and the Decline in Mortgage Lending to Minorities after the Housing Boom. Retrieved from <https://www.federalreserve.gov/econresdata/notes/feds-notes/2016/credit-availability-and-the-decline-in-mortgage-lending-to-minorities-after-the-housing-boom-20160929.html>

and/or putting persons at greater risk for foreclosure. This could also contribute to wealth gaps between protected classes and those not in protected classes as homeownership typically functions as a means to accumulate wealth. This issue may also be compounded in Texas for immigrant populations whose language and cultural barriers may create unique challenges.

### **Basis for Identifying Impediment**

- Analysis conducted in Section 7 of the AI noted different loan denial rates for mortgage applicants by race. Debt-to-income ratio and credit history were the most common reasons noted for denial.
- Hispanic or Latino persons represent 39% of the Texas population, but compose 24% of home loan applicants; and Black or African Americans represent 12% of the state population, but only 8% of loan applicants.
- African American applicants were denied home loans at higher rates than their White and Asian counterparts, even among those with higher incomes.
- Input was received from commenters from the border region alleging that lenders are targeting immigrant families with excessively high interest loans. Persons with LEP, who may fall under the protected class of national origin or race, may experience language barriers that further challenge accessing traditional credit products.
- Input was received claiming a lack of lending products for accessibility modifications for persons with disabilities.
- Commenters relayed anecdotal cases of individuals being “steered” based on income from one part of town, or being told that other areas would be more to their liking. Income is not a protected class.

### **Impediment 4: The scarcity and location of accessible and visitable housing units limits fair housing choice for persons with disabilities.**

The limited availability of accessible and visitable housing stock for persons with disabilities was a common theme expressed throughout the public consultation process. There are more than 3 million Texans with a disability<sup>50</sup>, and a significant number of persons with disabilities have extreme housing needs. Persons with disabilities face challenges finding housing that is affordable, accessible, and located near transit and supportive services. This is both a challenge in terms of the scarcity and location of accessible housing stock and the location of accessible housing integrated into the community with close proximity to medical and social services.

### **Basis for Identifying Impediment**

- Stakeholders expressed the need for accessible housing to be both integrated and dispersed throughout the community. Chapter 6, Program and Portfolio Analysis, reported that 9% of units in TDHCA’s portfolio of active properties, or 22,816 units, are accessible for either mobility or hearing/visual impairments. While this exceeds what has been the federal and state requirement, it does not mean that sufficient accessible

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<sup>50</sup> United States Census Bureau American Community Survey 5-Year Estimates, 2012-2016, Table S1810.

housing is available. Further it concentrates accessible housing into the HTC program; in Brownsville it was noted that most accessible housing is in fact found in tax credit properties and in Fort Worth stakeholders mentioned that most accessible locations for housing are in the lowest income neighborhoods that tend to have higher crime rates.

- Rural Texas faces unique challenges in fulfilling accessible housing and service needs because service providers may be located far from accessible housing.
- The importance of the connection between the location of accessible units and the location of supportive services, and ability to access those services, was relayed during consultations. Examples included community resources such as grocery stores, health providers, etc. For some households living in non-urban areas, securing transportation to medical appointments to obtain medication and to meet with case managers was a barrier as there was no public transportation and clients relied on family, friends, or alternate transportation services (e.g., taxi) to drive them to visits and appointments. Many persons discussed choosing to live near family members who provide a stable living environment and support in non-urban areas.
- The greatest need for accessible units is for units affordable to households in the ELI and VLI income categories. Census data indicate that persons with a disability are more likely to live in poverty than persons without a disability. The 2012-2016 ACS data show that 15% of individuals who live below the poverty level in Texas have a disability, while 11% of individuals who live at or above the poverty level have a disability. In some areas of this state this issue is compounded further, as the areas have larger populations with disabilities than the state rate, such as in Regions 2, 4, and 5.
- Challenges were identified that accessible housing may also be limited because persons with disabilities are not sufficiently educated in utilizing existing mechanisms to request reasonable accommodations and reasonable modifications to housing units and public spaces.
- When two FHIPs in Texas focused more intensively on testing, discriminatory practices were identified and pursued, and numbers reported to TWC-CRD increased. This may suggest that discriminatory practices are occurring, but because they are not being tested and then reported, they are not identifiable.

### **Impediment 5: There are barriers for specific protected classes that may limit mobility and free housing choice.**

Many difficulties in obtaining housing do not fit neatly into the impediments thus far identified. The State has included these obstacles as a fifth impediment. These hurdles were identified through outreach and consultation or were found in the data analysis presented in previous chapters.

#### **Basis for Identifying Impediment**

- Lack of access to transportation and supportive services was indicated as a problem during consultations. This was not limited to specific geographic areas in the state, but was more prevalent in rural areas. In many instances, public transportation was simply unavailable in smaller cities and towns. This issue of transportation is exacerbated in areas

## Impediments to Fair Housing Choice

of the state where large percentages of the population have long commutes for employment; in areas such as Sherman-Denison, Bryan-College Station, and Victoria roughly 40% of residents travel 25 miles or more.

- Credit history, while not directly linked to a protected class, was a common theme among the input received but an area with little to no guidance from HUD. Credit history is used by both rental properties to determine if an applicant is an acceptable tenant, and by lenders to determine creditworthiness for loans for home purchase.
  - Having an “unacceptable” credit score – which may vary from property to property and lender to lender - may be caused by failure to have paid creditors or having not paid timely. These “negative hits” may affect which applicant a property will rent a unit to.
  - In many cases, having a lack of credit history (the lack of acceptable credit scores based on failure to pay creditors or pay in a timely manner, and other adverse items) can also be a negative consideration for lenders and rental properties; with no record of timely payment history, they are less likely to approve or accept that household as a lender or tenant.
  - Health issues can contribute to loss of employment and insurance, impacting a household’s ability to retain good credit and/or secure housing.
  - HOPWA Program Project Sponsors indicated that credit history is a barrier to their clients’ ability to secure housing. Large apartment complexes conduct background checks and may also exclude applicants with any criminal history or poor rental history.
- FMR limits can reduce housing choice.
  - The high cost of rents, utilities, and living expenses in some areas of Texas have made it difficult for HOPWA clients to obtain a qualifying property within the provided ranges.
  - Other commenters noted that rents greatly increased due to housing demand from employees of the oil and gas industry in certain areas (e.g. Eagle Ford Shale, Snyder, Sweetwater, etc.), but FMRs did not keep up with rising rates. Substantial rent increases in these areas not only reduced the number of units that met regulatory rent standards and rent reasonableness requirements for rental assistance services, but also reduced the available housing for Housing Choice Voucher (HCV) recipients, one-bedroom units in particular. It was reported that units that did meet rent standard and rent reasonableness requirements were almost always concentrated in low-income neighborhoods with high crime rates.
  - Commenters also noted that many units did not include utilities as part of the rent and the required utility allowances further reduced the number of units that met rent standard and rent reasonableness requirements.
- Significant comment supported that there is pronounced reluctance on the part of private landlords to rent to individuals who are receiving government assistance, particularly HCV recipients. Stakeholders noted that HCV recipients consistently experience hurdles, from criminal background requirements to minimum income standards. This inclination to not want to serve HCV recipients is reportedly due to both stereotypical assumptions about HCV recipients, as well as landlord frustration with the complexities of the HUD program.



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Even if a voucher holder can find a unit that meets FMR limitations with a landlord willing to accept vouchers, there is limited likelihood that a voucher holder will be able to find a unit in an area with employment opportunities, good schools, amenities, etc.

- According to feedback received from commenters involved in the HOPWA program, landlords tended to shy away from working with a program that resembles the HCV program. However, because rental assistance from HOPWA is a cash transfer program where the funds are first provided to the tenant, many of the challenges experienced by voucher holders in the HCV Program are reduced for individuals using HOPWA rental assistance.
- A common issue at nearly all consultations was the challenge of finding safe, decent, and affordable housing opportunities for ex-offenders and those with a criminal background.
  - A significant portion of individuals with criminal records are members of one or more protected classes. HUD has indicated in guidance that criminal history has sufficient ties to race and disability and that there may be good cause for a fair housing case related to criminal history, on a case by case basis. However, commenters noted that HUD's guidance does not have enough specificity for properties to know how to change their tenant criteria, or whether they even need to.
  - Criminal history that limits access to housing further compounds the challenges of reentry and may reduce their success rates and increase recidivism.
  - This problem is most pronounced for persons whose criminal history includes violent crimes and sexual offenses in high occupancy areas where there are limited vacancies.
  - More information on the input received on this issue can be found in this chapter in the section on Criminal Records.
- It was reported that HOPWA clients with multiple diagnoses faced complex barriers in securing housing and complying with program requirements. Project Sponsors worked with several clients with multiple diagnosed issues including mental health, substance use, criminal justice histories, literacy issues, and eligibility issues that made housing the clients difficult, if not impossible. Clients' understanding of housing laws, leases, and/or applications was an ongoing issue partly due to reading and comprehension skills and abilities.
- Commenters noted that there is lack of larger housing units, specifically in the State's rental housing portfolio to accommodate larger families. These larger housing units are most in need in Regions 11 and 13 where the average household size and average family household size are well above the state average.
- Texas Housers alleged that discrimination occurs when HTC properties are concentrated in racially segregated, high poverty, high crime neighborhoods. However, concern was also raised at several consultations that older adults are unable to pay property taxes as property values appreciate in their communities, and they are being priced out of their homes. Some parts of the state areas are undergoing demographic change as a result of phenomena such as gentrification. The act of placing low income housing so that low income households can remain in their communities can ultimately lead to greater integration.

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- One of the challenges faced by the State is finding the balance of programming housing funds in ways that allows for ongoing preservation of existing affordable housing at risk of losing its affordability and/or in gentrifying areas, while also allowing for location of affordable units in areas considered High Opportunity. The State expects to pursue both avenues.
- Commenters noted in consultations focused on rural areas that fair housing issues can impact rural communities in different ways than in urban ones. For example, conversations about what neighborhoods are optimal for new lower income housing are less meaningful when a community is losing population overall, and rehabilitation of existing housing may be more significant.
  - There are limited data to help identify housing needs in rural Texas. Census data for small populations do not provide high confidence levels and cannot be used alone to reliably address fair housing choices.
  - The State must find the balance of using funds for single family rehabilitation and development – for areas of the state where a large portion of the housing stock is more than 49 years old (in particular regions 1, 2, and 12) with the need for new construction activity and multifamily activity. The State expects to continue to seek this balance.
  - Rural areas pose unique challenges to performing demographic analysis. Census blocks range in size anywhere from 600 to 3,000 people. In rural areas Census blocks may cover an entire county. For example, Loving County is an entire Census block. The racial data for this county will not provide substantive analysis based on geographic distribution. Substantive analysis is not possible when Census tracts or blocks become geographically too large and the data too limited.
  - In rural communities, a lack of access to high speed internet connections may limit residents' employment and educational opportunities. Slower internet speeds may also limit community solutions such as telemedicine options that might otherwise address a shortage of medical services. Although some rural communities request CDBG funding from TDA to address internet access concerns, federal program requirements limit the effective use of CDBG funding to address this issue. Providing broadband service to a large facility such as a hospital or major employer as an economic development activity is a promising opportunity for CDBG.
- Communities that are eligible for funds from the CDBG colonia set-aside or Self Help Centers must be located within 150 miles of the Texas-Mexico border, however other communities provided input that they face similar issues. Unincorporated communities in East Texas may also suffer from a lack of basic infrastructure and substandard housing; these communities can apply for various CDBG-funded programs, but are not eligible for the colonia set-aside.
- Parts of the state are prone to flooding but have poor drainage systems in place to mitigate damage. This issue is particularly true in colonias and, according to commenters, tends to be concentrated in lower income communities. This was mentioned in Brownsville as well as Houston, which still maintains open ditch drainage systems in some of the poorest neighborhoods in the city.

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- Commenters noted that there is inadequate or missing infrastructure and inadequate investment in infrastructure in low income communities, particularly in rural regions and regions along the Texas-Mexico border.
- One facet of housing choice includes having the option to remain in an area which may be predominantly low income. This would suggest the need for neighborhood revitalization, improvement of infrastructure, single family rehabilitation, and provision of strong services and amenities to make remaining in a low income area a viable choice. In the case of gentrifying neighborhoods, this may entail developing or preserving affordable housing in those areas and a need for local policies to attempt to mitigate displacement of long-time, often minority, residents.

### **Conclusion for Impediments**

These five impediments represent five major themes on fair housing which the State determined based on input and analysis. There are opportunities within the five impediments for the Texas state agencies who receive HUD CPD funds to utilize those funds to alleviate, mitigate, or take steps to combat certain problems in accessing fair housing choice. While there may be other obstacles to fair housing choice in local areas or outside the purview of the State, these five impediments represent those issues for which the state agencies receiving CPD funds may have some influence to promote safe, decent, affordable, and fair housing.

## Chapter 11 - Conclusions and Recommendations

This section of the Analysis of Impediments to Fair Housing Choice (AI) provides the culmination of all prior chapters. The earlier chapters each fed into the development of the five impediments outlined in Chapter 10: Impediments to Fair Housing Choice. This chapter now provides what the State recommends for action, with the exception of issues related to disaster recovery. All issues related to disaster recovery have been presented together within Chapter 9.

### Context and Limitations

Past State AI's covered not only what the State could do to mitigate impediments, but also covered what local government and other organizations could do. This AI is focused solely on the actions that can be performed by the State toward addressing the impediments identified in Chapter 10.

Texas state agencies participating in U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) programs have a limited role in causing—and eliminating—impediments to fair housing choice. Many of the trends identified in this document were not the cause of a state level action, omission, or decision and moreover, are not something within the control or authority of the state agencies receiving HUD CPD funds. However, the State acknowledges it has a role in affirmatively furthering fair housing choice for all Texans.

The Texas Department of Housing and Community Affairs (TDHCA), for example, only has the authority to oversee properties that are part of its portfolio. This means that there is no way for TDHCA to enforce its rules on housing providers that do not participate in TDHCA's programs. However, even when a provider does participate in a TDHCA program, TDHCA does not have the power to enforce the Fair Housing Act, as this responsibility lies with the Texas Workforce Commission's Civil Rights Division (TWC-CRD).

It should be noted as well that the majority of program funds received by TDHCA are not HUD CPD funds, and are not subject to the Affirmatively Furthering Fair Housing (AFFH) rule. The single largest program in terms of affordable rental housing that TDHCA oversees is the Low Income Housing Tax Credit (LIHTC) Program, which is not funded through HUD's CPD appropriation to the State.

The responsibility and resources to affirmatively further fair housing and to increase fair housing choice are shared by TDHCA, the Texas Department of Agriculture (TDA), the Texas General Land Office (GLO), and the Texas Department of State Health Services (DSHS). This spreads the responsibilities of administering HUD CPD funds across four state agencies with a fifth agency, TWC, responsible for enforcing the Fair Housing Act. Each of these agencies also have jurisdictional restrictions. The GLO, for instance, receives disaster recovery funds, which are only useable in disaster recovery areas, while DSHS only administers the Housing Opportunities for Persons with AIDS (HOPWA) Program.

The State's HUD CPD funds administered through these agencies are not sufficient, nor required, to address AFFH on behalf of the large number of local and regional jurisdictions that also receive

HUD CPD funds, each of which administers their own programs. For these reasons, the State will focus solely on recommendations that are within its ability and authority to act upon.

### **Impediments<sup>51</sup>**

Through the early consultation process and analysis of a variety of data sources, the State has identified five impediments to fair housing choice. Through the consultation process described in Chapter 1: Executive Summary, the State refined and revised the considerations supporting each impediment; in large part, these five impediments encompass the six impediments previously identified in 2013's AI. The five impediments identified in Chapter 10: Impediments to Fair Housing Choice are:

- 1: Not in My Backyard Syndrome (NIMBYism) can limit affordable housing development, which could limit housing choice for protected classes in some communities.
- 2: There is a lack of understanding and awareness of fair housing law, rights, and duties available to local governments, stakeholders, and the public about fair housing requirements and programs to assist low-income residents and persons with disabilities.
- 3: Protected classes may experience obstacles in accessing homeownership and lending products.
- 4: The scarcity and location of accessible and visitable housing units limits fair housing choice for persons with disabilities.
- 5: There are barriers for specific protected classes that may limit mobility and free housing choice.

### **Recommendations and Proposed Actions**

This document is not an attempt to tackle all possibilities relating to actions that could address fair housing, but to offer specific, measurable, actionable, reasonable, and time-bound goals to address the identified impediments that are likely to be achievable within current resource constraints.

As became evident in the discussion of the impediments, there is overlap among impediments; as such there should be overlap and interplay among the actions to address those impediments. Therefore, in lieu of identifying an action multiple times that may be effective in addressing several different impediments, this section instead provides recommendations and associated actions only once and then reflects the multiple impediments that will be addressed by that action.

**Recommendation 1: Maximize accessible housing choice by promoting preservation and limiting displacement, continuing to encourage development in high opportunity areas, and encouraging creative, innovative solutions.**

*Impediments Addressed: 1, 4, and 5*

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<sup>51</sup> See the important discussion in Ch. 10 regarding the use of this term in relation to the Fair Housing Act.

## Conclusions and Recommendations

As discussed in Chapter 10: Impediments to Fair Housing Choice, to the extent low income and elderly households are being displaced from their historically minority communities as urban neighborhoods gentrify, it would limit the options those low income households would have to remain in their community. While the movement of higher income individuals to lower income areas leads to neighborhood revitalization and investment, this will naturally lead to increases in land values. It would also, ostensibly, make previously affordable properties – whether single or multifamily – no longer attainable for low income households. As investment and land values rise, amenities and services tend to increase in quality and availability as well, increasing the likelihood that low income households may want to stay in the community.

Rising property values mean higher property tax bills and rents, making it harder for residents who lived in the neighborhood prior to gentrification to remain, which may lead to displacement of the historical neighborhood population. Siting new construction of multi-family properties in redeveloping areas requires some foresight on the part of developers, and available locations may have undesirable site locations or features that could be mitigated by the incoming investment and revitalization efforts. In conjunction, HUD CPD funds can be used to promote preservation of existing properties helping to ensure continued affordability of units that may be lost to the state’s affordable housing stock.

The State does not expect to abandon its course over the past several years in promoting development in high opportunity areas. While preservation and minimizing displacement are one means to promote choice, low income Texans may alternatively choose to live in areas of “high[er] opportunity.” A 2018 study by the National Low Income Housing Coalition and the Public and Affordable Housing Research Corporation specifically noted that so long as access to resources for affordable housing are limited, there will be a significant challenge on the part of funding agencies to decide whether and how to balance the pursuit of affordable housing that promotes access to areas of opportunity against the pursuit of preservation of housing units and housing stability. Tax credit units funded in the earlier years of the program are now increasingly at risk of losing their affordability and agencies must determine whether they should preserve affordability even if that may mean investing funds where opportunities are not considered as optimal.<sup>52</sup>

**Action Item:** TDHCA and other state agencies can attempt to mitigate displacement, and provide a broader spectrum of choice, by programming multifamily HUD CPD funds for:

Preservation of properties at risk of losing affordability, with a priority made for properties for which there is evidence that rents – if not subsidized – would increase significantly. The University of Texas at Austin developed a methodology for identifying areas that are vulnerable to gentrification and displacement.<sup>53</sup> State Agencies receiving HUD CPD funds can use this type

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<sup>52</sup> National Low Income Housing Coalition and Public and Affordable Housing Research Corporation. Balancing Priorities: Preservation and Neighborhood Opportunity in the Low-Income Housing Tax Credit Program Beyond Year 30. October, 2018. < <https://nlihc.org/sites/default/files/Balancing-Priorities.pdf>>.

<sup>53</sup> Way, Mueller, and Wegman. The University of Texas Center for Sustainable Development and the Entrepreneurship and Community Development Clinic. “Uprooted: Residential Displacement in Austin’s Gentrifying Neighborhoods and What Can Be Done About It.” 2018. < <https://sites.utexas.edu/gentrificationproject/>>.

## Conclusions and Recommendations

of metric to shepherd new developments and rehabilitation efforts to areas vulnerable to from displacement.

Promotion of new construction or rehabilitation in urban core areas with attributes that would indicate displacement is occurring for historically low income households in the community.

Investing funds in the rehabilitation and redevelopment of smaller multifamily properties. For example, smaller developments already embedded in a community may be able to provide affordable, small scale options in urban areas while allowing for reinvestment to be spread across an area through multiple smaller developments instead of one large, new construction property. Continue to promote giving assistance to rural developments, many funded long ago by USDA, so that they can rehabilitate and prevent older affordable rural properties from becoming obsolete.

**Action Item:** TDHCA and other state agencies can continue to use multifamily HUD CPD funds to provide financing, or partial financing, as needed, for new construction or rehabilitation in areas of high opportunity. TDHCA's LIHTC program, while not a HUD CPD activity, strongly promotes siting properties in high opportunity areas. By establishing threshold and selection criteria in the programming of HUD CPD funds that reflect those priorities, TDHCA can attempt to shepherd affordable housing options into areas that will allow for current residents and new residents alike to benefit from living in these higher opportunity areas.

**Action Item:** In areas that may not be gentrifying but are still seeing rapid demographic shifts, such as more rural areas, encourage TDA CDBG funds and GLO disaster funds to be used for housing rehabilitation. Frequently, communities that apply for housing rehabilitation projects prioritize units for elderly and/or disabled persons, which may include ramps and other accessibility improvements.

In 2015, TDA expanded the CDBG housing rehabilitation opportunities; in addition to the traditional owner-occupied units, the program began allowing rehabilitation of non-profit owned single family housing units and multifamily structures with up to four units. This rehabilitation can include basic construction and/or improvements for accessibility. In an example provided by stakeholders, a nonprofit benefiting persons with intellectual and developmental disabilities (IDD) could use grant funds to purchase a triplex; the rehabilitated units may include smart technology and other features to assist residents with disabilities to live independently, and the organization may choose to have a caregiver live in one of the units to further support the residents as needed.

**Action Item:** HUD CPD funds for construction and rehabilitation – single or multifamily -- should be programmed to promote accessibility and visitability.

Several eligible CDBG and HOME Investment Partnerships Program (HOME) activities can address barriers that may affect Texans with disabilities. Infrastructure and public facility access can be critical to a person's ability to fully participate in the community. Rehabilitation of sidewalks, for example, is an eligible CDBG activity that can allow persons with mobility disabilities to better access businesses and resources in the community. Sidewalk improvements are the main activity for the Downtown Revitalization/Main Street Program, a small but highly popular category of TDA CDBG funding. In addition, TDA's Community Development Fund can be used to make accessibility improvements to city halls, county courthouses, and other important community

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facilities. TDHCA uses its funds to allow additional accessibility modifications when purchasing or rehabilitating a home with HOME funds. Carrying the theme of accessibility through all HUD CPD programming will help increase the supply of accessible affordable housing dispersed throughout the community.

**Action Item:** Re-consider rules that may limit creative use of HUD CPD funding for homeownership and provide for opportunities for special case exceptions in underwriting or manual underwriting.

Manufactured and alternative housing options, such as tiny homes, are not commonly considered in the pool of affordable housing stock outside of disaster response. To expand the possible options for those with low incomes, TDHCA expects to further evaluate its rules to identify revisions that may increase the opportunity to pursue non-traditional housing options across the state.

**Action Item:** The state agencies receiving HUD CPD funds should continue to improve their relationship with Texas Health and Human Service (HHS) agencies and service providers to maximize opportunities for collaboration and the leveraging of resources, such as continuing to look for opportunities similar to the Section 811 PRA Program or Project Access Program, in which choice is greatly expanded for certain populations of persons with disabilities through inter-agency collaboration. Ongoing, active engagement of a housing and community development presence at behavioral health task forces and work groups will help keep dialogue open and promote creative solutions.

**Action Item:** Prioritize and encourage that HUD CPD funded properties be located on sites that promote transportation options, public transit, location of social services, and access to medical and educational services.

**Action Item:** Establish a workgroup of housing authorities, Councils of Governments, and developers to consider opportunities for promoting choice and improving resident mobility.

**Action Item:** As needed, the State expects to continue to seek out waivers and exceptions to exceed Fair Market Rents for its HOPWA, HOME Tenant Based Rental Assistance (TBRA), and ESG programs to improve tenant choice and improve the likelihood of finding decent, safe, accessible units with their assistance.

**Recommendation 2: Increase the provision of educational resources to the developer, property manager, and tenant communities, and to the mortgage lending and realtor industries.**

*Impediments Addressed: 1, 2, 3, 4, and 5.*

Throughout the early consultation period conducted for this AI, stakeholders consistently noted that there was a need for more information and education regarding fair housing laws, rights, and duties, as well as education about credit, accessibility, reasonable accommodations, and the types of programs and housing supported or administered by state agencies.

**Action Item:** Provide more frequent trainings for single family and multifamily housing developers and property managers and ensure agency staff that work with HUD CPD programs are familiar with the most current fair housing training resources. Focus trainings on handling



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accessibility modification requests and reasonable accommodations, updated or revised guidance from HUD, and best practices in tenant selection.

**Action Item:** Seek to expand the property management outreach process for training and informational materials to market rate and privately owned properties through social media and collaborations with trade and advocacy associations. TDHCA may seek to expand the reach of its training opportunities by improving advertising on more platforms, including the websites of other state agencies and related organizations.

**Action Item:** Seek out opportunities for the State to educate and inform local officials, community leaders, and neighborhood organizations on NIMBYism and fair housing. Opportunities to present on best practices, rights, and responsibilities of fair housing might include conferences and events (American Planning Association, Texas Municipal League, etc.) or fairs and expos (Texas State Fair).

**Action Item:** The State will seek additional guidance as needed from HUD on matters of fair housing.

**Action Item:** Empower tenants and those who assist them by providing and promoting trainings to nonprofit and advocacy organizations, tenant protection organizations, housing counselors and navigators, and local health authority staff and caseworkers on fair housing and protected classes, retaliation, VAWA protections, and, for those with disabilities, how to assist their clients with navigating requests for reasonable accommodations and modifications. Currently, TDHCA provides such trainings annually and on request. TDHCA can expand upon this particular action through informing other agencies of these training opportunities with Texas HHS, TDA, GLO, and TWC. Further, TDHCA can update its Tenant's Rights and Resources Guide to direct prospective and current tenants to these training resources.

**Action Item:** Empower low income homebuyers by providing and promoting trainings to nonprofit and realtor groups who work with low income households on TDHCA homeownership programs and on fair housing in sales and lending. TDHCA FHDMMR staff can liaise with such organizations to determine areas of opportunity or gaps in information.

**Action Item:** Agencies that currently provide credit counseling can also provide more targeted outreach and information for consumers in any of their programs about credit and its implications on both rental and homebuyer opportunities. TDHCA can identify areas of the state, if any, where there is a shortage of HUD certified Housing Counseling organizations.

**Action Item:** To ensure a focus on the unique conditions and challenges in border regions and in colonias, utilize CDBG funds and TDHCA's Self-Help Centers to improve resident awareness of fair housing rights and protections for renters, and fair lending protections for those seeking homeownership. Ensure TDHCA's Border Field Offices are able to provide local fair housing training and direct their clients to existing training and information on TDHCA's Fair Housing website.

### **Recommendation 3: Reduce Stigmatizing Language and Practices**

*Impediments Addressed: 1, 2 and 5*

## Conclusions and Recommendations

In conjunction with increased educational outreach, attention to the language used when talking about affordable housing and fair housing can help to alleviate some impediments the State and Texans face.

**Action Item:** Limit stigmatizing language in HUD CPD program materials and outreach.

The HOPWA program works to maintain and use language that does not stigmatize individuals living with HIV. It is important to note that, while “AIDS” is included in the program name itself, HOPWA refers to the clients it serves as people living with HIV, rather than HIV/AIDS. Simply removing the historically charged term “AIDS” may help clients from feeling isolated by their perceived status.

Fair housing can encompass some socially and politically sensitive issues. Therefore, the State can help to address some of this sensitivity by reviewing the language that it uses in its various media sources. References to “housing projects” could be replaced with descriptions specific to their programs, such as Housing Tax Credit developments or HOME property to remove some of the older, stigmatized language that often has pejorative connotations. In the front lobby of TDHCA, there are two plaques that proudly display a pair of LIHTC projects that were awarded funds by TDHCA. These affordable housing properties are modern, aesthetically and architecturally unique, and located in high opportunity areas. Using these sorts of properties as an example, State agencies can begin to break down some of the stereotypical and often inaccurate conceptions surrounding “government subsidized housing.” TDHCA, GLO, and TDA could initiate a review of their procedures and materials to incorporate this more accurate language.

By doing this, not only will the general public begin to view the State’s affordable housing portfolio more positively, but also will begin to shed some of their preconceived notions about the residents of these properties as well. When neighborhoods no longer perceive affordable housing as drab and undesirable, they are less likely to object to affordable housing being situated nearby.

### **Recommendation 4: Actively Engage in the Enforcement of the Fair Housing Act**

*Impediments Addressed: 1, 2, 3, 4, and 5*

Currently, TDHCA maintains a Memorandum of Understanding with TWC-CRD regarding possible fair housing violations. If TDHCA suspects that the Fair Housing Act may have been violated in one of the properties it monitors, it has the ability to refer that matter to TWC-CRD for investigation. Conversely, if TWC-CRD suspects, during any of its investigations, that a property has violated TDHCA’s rules, TWC-CRD can refer that matter to TDHCA.

The Housing Resource Center at TDHCA handles the intake and processing of all complaints that come to TDHCA. For each complaint received, the Housing Resource Center immediately drafts a response to the complainant to explain TDHCA’s role and jurisdiction.

**Action Item:** Add language in preliminary communications with complainants and program participants advising them on how to submit a fair housing complaint to TWC-CRD if they feel their rights have been violated. Often, those seeking housing do not know their rights and responsibilities or do not know whom to contact to protect their rights.

## Conclusions and Recommendations

**Action Item:** Investigate whether federal or private funds are available to provide fair housing testing and/or research funds to promote greater enforcement of fair housing in rural areas not covered by Fair Housing Initiatives Program and Fair Housing Assistance Program organizations to gather more information on the extent and nature of discrimination.

**Action Item:** Continue to have Fair Housing Workgroup meetings among all state agencies funded with HUD CPD funds, as well as TWC-CRD, to share information, improve collaboration, and leverage training resources and opportunities.

### **Recommendation 5: Work with Trade Organizations, Local Jurisdictions, and Regulatory Agencies for Mutual Benefit**

*Impediments Addressed: 1, 2, 3, 4, and 5*

Texas has a history of strong and active trade organizations that relate to housing, community development, and affordable housing; those groups include entities that represent local housing finance agencies, affordable housing providers, local municipalities, community development corporations, realtors, and lenders. Maximizing those relationships to increase the provision of training and opportunities may result in greater information dissemination about fair housing.

**Action Item:** Target specific opportunities for training, outreach, and collaboration with state housing partners.

The Texas Association of Realtors (TAR), for example, represents agents, brokers, and apartment locators. If TAR's members are more aware of the State's available programs and participating properties it may help provide those seeking housing with a knowledgeable apartment locator or realtor. Real estate agents that are aware of programs like the Texas Bootstrap Loan and Amy Young Barrier Removal (AYBR) programs would be able to assist their clients with the potential to pair these programs with a house that may not be accessible currently, but could be by utilizing AYBR or HOME funding.

Similar to TAR, the Texas Apartment Association (TAA) represents rental property owners, builders, developers, and managers in the state. Additionally, the Texas Affiliation of Affordable Housing Providers (TAAHP) represents rental property owners, developers, and managers specifically developing affordable rental properties. Many apartment complexes in the state already use TAA's lease template and TAA, in conjunction with TDHCA, provides training on understanding the LIHTC program.

The State currently licenses and regulates real estate agents and brokers through the Texas Real Estate Commission (TREC). By expanding the Department's relationship with TREC and informing it of the State's HUD CPD programs and affordable housing opportunities, it should be possible to boost the number of licensed real estate professionals who are aware of State programs that may be available to their clientele.

In the process of garnering public comment on the AI, several local entities and organizations attended hearings and the State was able to provide some technical assistance and discuss local fair housing efforts. While the State does not have sufficient resources to coordinate fair housing initiatives or offer training to the multitude of different localities in the state, the State can and

does serve as a resource should these localities reach out for technical assistance. The State plans on contacting individual groups who have provided comment for this AI, to encourage their ongoing engagement with the Department. Additionally, the State will inform said groups that they can and should disseminate this to any others they feel would be interested.

### **Conclusion**

The 2019 State of Texas Analysis of Impediments to Fair Housing Choice works from the guiding principle of seeking to identify impediments to fair housing choice and identify specific actionable steps that can be taken to effect meaningful changes aimed at mitigating the barriers to fair housing choice. To this end, the State engaged in an analysis of statewide, regional, and local data points to identify possible instances of impediments facing protected classes. This was coupled with extensive outreach to the public and stakeholders, as well as targeted outreach to specific subpopulations and groups.

After looking at the 2013 AI, the State took an inventory of the actions it had taken to mitigate the identified impediments since 2013. By combining the data analysis and public consultation with the work from the 2013 AI and a review of current Texas statute and administrative code, the State identified five impediments to fair housing choice facing protected classes.

The State has focused its efforts on those avenues where state agencies receiving HUD CPD funds could act within their authority and with their HUD CPD resources. Finally, once these impediments were identified, the state agencies receiving HUD CPD funds developed recommendations for ways to use their current HUD CPD funds to alleviate these obstacles.

## Appendix A - Commonly Used Acronyms

<b>Acronym</b>	<b>Meaning</b>
AA	Administrative Agency
ACS	American Community Survey
AFFH	Affirmatively Furthering Fair Housing
AFH	Assessment of Fair Housing
AI	Analysis of Impediments
AMFI	Area Median Family Income
AYBR	Amy Young Barrier Removal Program
BHAC	Behavioral Health Advisory Committee
Bootstrap	Texas Bootstrap Loan Program
CAA	Community Action Agency
CDBG	Community Development Block Grant
CFD	Contract for Deed
CFPB	Consumer Financial Protection Bureau
CHAS	Comprehensive Housing Affordability Strategy
CHDO	Community Housing Development Organization
CoC	Continuum of Care
CPD	Community Planning and Development
DAW	Disability Advisory Workgroup
DR	Disaster Recovery
DSHS	Department of State Health Services
ELI	Extremely Low Income
EPI	Texas HIV Epidemiological Profile
ESG	Emergency Solutions Grant
FBHA	Facility Based Housing Assistance
FHAA	Fair Housing Act Amendments of 1988
FHAP	Fair Housing Assistance Program
FHDMR	Fair Housing, Data Management, and Reporting
FHIP	Fair Housing Initiatives Program
FMR	Fair Market Rent
FVA	Fund for Veterans' Assistance
GLO	General Land Office
HBA	Homebuyer Assistance
HCV	Housing Choice Voucher
HHS	Health and Human Services
HHSC	Texas Health and Human Services Commission
HHSCC	Housing and Health Services Coordinating Council

## Commonly Used Acronyms

<b>Acronym</b>	<b>Meaning</b>
HOME	HOME Investment Partnerships Program
HOPA	Housing for Older Persons Act
HOPWA	Housing Opportunities for Persons with HIV/AIDS
HRA	Homeowner Rehabilitation Assistance
HSDA	HIV Service Delivery Area
HTC	Housing Tax Credit Program
HUD	United States Department of Housing and Urban Development
ICP	Inclusive Communities Project, Inc.
IDD	Intellectual and Developmental Disabilities
LEP	Limited English Proficiency
LI	Low Income
LIHTC	Low Income Housing Tax Credit Program
LMHA	Local Mental Health Authority
LMISD	Low and Moderate Income Summary Data
MF Bond	Multifamily Bond Program
MFDL	Multifamily Direct Loan Program
MFTH	My First Texas Home Program
MI	Middle Income
MSA	Metropolitan Statistical Area
NHTF	National Housing Trust Fund
NIMBY	Not in My Back Yard
PATH	Projects for Assistance in Transition from Homelessness
PHA	Public Housing Authority
PHP	Permanent Housing Placement
PJ	Participating Jurisdiction
PLWH	Persons Living with HIV
PRA	Project Rental Assistance
QAP	Qualified Allocation Plan
RFP	Request for Proposals
SAFMR	Small Area Fair Market Rent
SFD	Single Family Development
SHC	Colonia Self Help Center
SHTF	Texas State Housing Trust Fund
SLRTP	Statewide Long Range Transportation Plan
SSDI	Social Security Disability Insurance
SSI	Social Security Insurance
STIP	Statewide Transportation Improvement Plan
STRMU	Short Term Rent, Mortgage, and Utility

## Commonly Used Acronyms

<b>Acronym</b>	<b>Meaning</b>
STSH	Short Term Supportive Housing
TAA	Texas Apartment Association
TAAHP	Texas Affiliation of Affordable Housing Providers
TAC	Texas Administrative Code
TAR	Texas Association of Realtors
TBAE	Texas Board of Architectural Examiners
TBRA	Tenant Based Rental Assistance
TDA	Texas Department of Agriculture
TDC	Texas Demographic Center
TDHCA	Texas Department of Housing and Community Affairs
TDLR	Texas Department of Licensing and Registration
TICH	Texas Interagency Council for the Homeless
TML	Texas Municipal League
TREC	Texas Real Estate Commission
TSH	Transitional Supportive Housing
TTY	Text Telephone
TVC	Texas Veterans Commission
TWC	Texas Workforce Commission
TWC-CRD	Texas Workforce Commission Civil Rights Division
TxCDBG	Texas Community Development Block Grant Program
TxDOT	Texas Department of Transportation
UFAS	Uniform Federal Accessibility Standards
UTP	Unified Transportation Program
VAWA	Violence Against Women Act
VLB	Texas Veterans Land Board
VLI	Very Low Income

## Appendix B - Metro Status of Texas Counties

Figure B-1: Metro Status and TDHCA Service Region of Texas Counties

County	Metro Status	TDHCA Region Number
Anderson	Non-Metro	4
Andrews	Non-Metro	12
Angelina	Non-Metro	5
Aransas	Metro	10
Archer	Metro	2
Armstrong	Metro	1
Atascosa	Metro	9
Austin	Metro	6
Bailey	Non-Metro	1
Bandera	Metro	9
Bastrop	Metro	7
Baylor	Non-Metro	2
Bee	Non-Metro	10
Bell	Metro	8
Bexar	Metro	9
Blanco	Non-Metro	7
Borden	Non-Metro	12
Bosque	Non-Metro	8
Bowie	Metro	4
Brazoria	Metro	6
Brazos	Metro	8
Brewster	Non-Metro	13
Briscoe	Non-Metro	1
Brooks	Non-Metro	10
Brown	Non-Metro	2
Burleson	Metro	8
Burnet	Non-Metro	7
Caldwell	Metro	7
Calhoun	Non-Metro	10
Callahan	Metro	2
Cameron	Metro	11
Camp	Non-Metro	4
Carson	Metro	1
Cass	Non-Metro	4

County	Metro Status	TDHCA Region Number
Castro	Non-Metro	1
Chambers	Metro	6
Cherokee	Non-Metro	4
Childress	Non-Metro	1
Clay	Metro	2
Cochran	Non-Metro	1
Coke	Non-Metro	12
Coleman	Non-Metro	2
Collin	Metro	3
Collingsworth	Non-Metro	1
Colorado	Non-Metro	6
Comal	Metro	9
Comanche	Non-Metro	2
Concho	Non-Metro	12
Cooke	Non-Metro	3
Coryell	Metro	8
Cottle	Non-Metro	2
Crane	Non-Metro	12
Crockett	Non-Metro	12
Crosby	Metro	1
Culberson	Non-Metro	13
Dallam	Non-Metro	1
Dallas	Metro	3
Dawson	Non-Metro	12
DeWitt	Non-Metro	10
Deaf Smith	Non-Metro	1
Delta	Non-Metro	4
Denton	Metro	3
Dickens	Non-Metro	1
Dimmit	Non-Metro	11
Donley	Non-Metro	1
Duval	Non-Metro	10
Eastland	Non-Metro	2
Ector	Metro	12



Metro Status of Texas Counties

County	Metro Status	TDHCA Region Number
Edwards	Non-Metro	11
El Paso	Metro	13
Ellis	Metro	3
Erath	Non-Metro	3
Falls	Metro	8
Fannin	Non-Metro	3
Fayette	Non-Metro	7
Fisher	Non-Metro	2
Floyd	Non-Metro	1
Foard	Non-Metro	2
Fort Bend	Metro	6
Franklin	Non-Metro	4
Freestone	Non-Metro	8
Frio	Non-Metro	9
Gaines	Non-Metro	12
Galveston	Metro	6
Garza	Non-Metro	1
Gillespie	Non-Metro	9
Glasscock	Non-Metro	12
Goliad	Metro	10
Gonzales	Non-Metro	10
Gray	Non-Metro	1
Grayson	Metro	3
Gregg	Metro	4
Grimes	Non-Metro	8
Guadalupe	Metro	9
Hale	Non-Metro	1
Hall	Non-Metro	1
Hamilton	Non-Metro	8
Hansford	Non-Metro	1
Hardeman	Non-Metro	2
Hardin	Metro	5
Harris	Metro	6
Harrison	Non-Metro	4
Hartley	Non-Metro	1
Haskell	Non-Metro	2
Hays	Metro	7

County	Metro Status	TDHCA Region Number
Hemphill	Non-Metro	1
Henderson	Non-Metro	4
Hidalgo	Metro	11
Hill	Non-Metro	8
Hockley	Non-Metro	1
Hood	Metro	3
Hopkins	Non-Metro	4
Houston	Non-Metro	5
Howard	Non-Metro	12
Hudspeth	Metro	13
Hunt	Metro	3
Hutchinson	Non-Metro	1
Irion	Metro	12
Jack	Non-Metro	2
Jackson	Non-Metro	10
Jasper	Non-Metro	5
Jeff Davis	Non-Metro	13
Jefferson	Metro	5
Jim Hogg	Non-Metro	11
Jim Wells	Non-Metro	10
Johnson	Metro	3
Jones	Metro	2
Karnes	Non-Metro	9
Kaufman	Metro	3
Kendall	Metro	9
Kenedy	Non-Metro	10
Kent	Non-Metro	2
Kerr	Non-Metro	9
Kimble	Non-Metro	12
King	Non-Metro	1
Kinney	Non-Metro	11
Kleberg	Non-Metro	10
Knox	Non-Metro	2
La Salle	Non-Metro	11
Lamar	Non-Metro	4
Lamb	Non-Metro	1
Lampasas	Metro	8

Metro Status of Texas Counties

County	Metro Status	TDHCA Region Number
Lavaca	Non-Metro	10
Lee	Non-Metro	7
Leon	Non-Metro	8
Liberty	Metro	6
Limestone	Non-Metro	8
Lipscomb	Non-Metro	1
Live Oak	Non-Metro	10
Llano	Non-Metro	7
Loving	Non-Metro	12
Lubbock	Metro	1
Lynn	Metro	1
Madison	Non-Metro	8
Marion	Non-Metro	4
Martin	Metro	12
Mason	Non-Metro	12
Matagorda	Non-Metro	6
Maverick	Non-Metro	11
McCulloch	Non-Metro	12
McLennan	Metro	8
McMullen	Non-Metro	10
Medina	Metro	9
Menard	Non-Metro	12
Midland	Metro	12
Milam	Non-Metro	8
Mills	Non-Metro	8
Mitchell	Non-Metro	2
Montague	Non-Metro	2
Montgomery	Metro	6
Moore	Non-Metro	1
Morris	Non-Metro	4
Motley	Non-Metro	1
Nacogdoches	Non-Metro	5
Navarro	Non-Metro	3
Newton	Metro	5
Nolan	Non-Metro	2
Nueces	Metro	10
Ochiltree	Non-Metro	1

County	Metro Status	TDHCA Region Number
Oldham	Metro	1
Orange	Metro	5
Palo Pinto	Non-Metro	3
Panola	Non-Metro	4
Parker	Metro	3
Parmer	Non-Metro	1
Pecos	Non-Metro	12
Polk	Non-Metro	5
Potter	Metro	1
Presidio	Non-Metro	13
Rains	Non-Metro	4
Randall	Metro	1
Reagan	Non-Metro	12
Real	Non-Metro	11
Red River	Non-Metro	4
Reeves	Non-Metro	12
Refugio	Non-Metro	10
Roberts	Non-Metro	1
Robertson	Metro	8
Rockwall	Metro	3
Runnels	Non-Metro	2
Rusk	Metro	4
Sabine	Non-Metro	5
San Augustine	Non-Metro	5
San Jacinto	Non-Metro	5
San Patricio	Metro	10
San Saba	Non-Metro	8
Schleicher	Non-Metro	12
Scurry	Non-Metro	2
Shackelford	Non-Metro	2
Shelby	Non-Metro	5
Sherman	Non-Metro	1
Smith	Metro	4
Somervell	Metro	3
Starr	Non-Metro	11
Stephens	Non-Metro	2
Sterling	Non-Metro	12

Metro Status of Texas Counties

County	Metro Status	TDHCA Region Number
Stonewall	Non-Metro	2
Sutton	Non-Metro	12
Swisher	Non-Metro	1
Tarrant	Metro	3
Taylor	Metro	2
Terrell	Non-Metro	12
Terry	Non-Metro	1
Throckmorton	Non-Metro	2
Titus	Non-Metro	4
Tom Green	Metro	12
Travis	Metro	7
Trinity	Non-Metro	5
Tyler	Non-Metro	5
Upshur	Metro	4
Upton	Non-Metro	12
Uvalde	Non-Metro	11
Val Verde	Non-Metro	11
Van Zandt	Non-Metro	4
Victoria	Metro	10
Walker	Non-Metro	6

County	Metro Status	TDHCA Region Number
Waller	Metro	6
Ward	Non-Metro	12
Washington	Non-Metro	8
Webb	Metro	11
Wharton	Non-Metro	6
Wheeler	Non-Metro	1
Wichita	Metro	2
Wilbarger	Non-Metro	2
Willacy	Non-Metro	11
Williamson	Metro	7
Wilson	Metro	9
Winkler	Non-Metro	12
Wise	Metro	3
Wood	Non-Metro	4
Yoakum	Non-Metro	1
Young	Non-Metro	2
Zapata	Non-Metro	11
Zavala	Non-Metro	11

## Appendix C - Unemployment Rates

Figure C-1: Unemployment Rate in Texas and the U.S. 2000-2017, U.S. Bureau of Labor Statistics

Date	Texas	United States
1/1/2000	4.6	4.0
2/1/2000	4.6	4.1
3/1/2000	4.5	4.0
4/1/2000	4.4	3.8
5/1/2000	4.3	4.0
6/1/2000	4.3	4.0
7/1/2000	4.2	4.0
8/1/2000	4.2	4.1
9/1/2000	4.1	3.9
10/1/2000	4.1	3.9
11/1/2000	4.0	3.9
12/1/2000	4.0	3.9
1/1/2001	4.1	4.2
2/1/2001	4.2	4.2
3/1/2001	4.3	4.3
4/1/2001	4.5	4.4
5/1/2001	4.6	4.3
6/1/2001	4.8	4.5
7/1/2001	5.0	4.6
8/1/2001	5.2	4.9
9/1/2001	5.4	5.0
10/1/2001	5.6	5.3
11/1/2001	5.8	5.5
12/1/2001	6.0	5.7
1/1/2002	6.1	5.7
2/1/2002	6.2	5.7
3/1/2002	6.3	5.7
4/1/2002	6.3	5.9
5/1/2002	6.3	5.8
6/1/2002	6.4	5.8
7/1/2002	6.4	5.8
8/1/2002	6.4	5.7
9/1/2002	6.4	5.7
10/1/2002	6.5	5.7

Date	Texas	United States
11/1/2002	6.5	5.9
12/1/2002	6.6	6.0
1/1/2003	6.6	5.8
2/1/2003	6.7	5.9
3/1/2003	6.8	5.9
4/1/2003	6.8	6.0
5/1/2003	6.9	6.1
6/1/2003	6.9	6.3
7/1/2003	6.9	6.2
8/1/2003	6.8	6.1
9/1/2003	6.7	6.1
10/1/2003	6.5	6.0
11/1/2003	6.4	5.8
12/1/2003	6.3	5.7
1/1/2004	6.2	5.7
2/1/2004	6.2	5.6
3/1/2004	6.1	5.8
4/1/2004	6.1	5.6
5/1/2004	6.0	5.6
6/1/2004	5.9	5.6
7/1/2004	5.8	5.5
8/1/2004	5.8	5.4
9/1/2004	5.8	5.4
10/1/2004	5.8	5.5
11/1/2004	5.8	5.4
12/1/2004	5.8	5.4
1/1/2005	5.7	5.3
2/1/2005	5.7	5.4
3/1/2005	5.6	5.2
4/1/2005	5.5	5.2
5/1/2005	5.4	5.1
6/1/2005	5.3	5.0
7/1/2005	5.3	5.0
8/1/2005	5.3	4.9

Date	Texas	United States
9/1/2005	5.3	5.0
10/1/2005	5.3	5.0
11/1/2005	5.3	5.0
12/1/2005	5.2	4.9
1/1/2006	5.2	4.7
2/1/2006	5.1	4.8
3/1/2006	5.1	4.7
4/1/2006	5.1	4.7
5/1/2006	5.1	4.6
6/1/2006	5.0	4.6
7/1/2006	5.0	4.7
8/1/2006	4.9	4.7
9/1/2006	4.7	4.5
10/1/2006	4.6	4.4
11/1/2006	4.5	4.5
12/1/2006	4.4	4.4
1/1/2007	4.4	4.6
2/1/2007	4.3	4.5
3/1/2007	4.3	4.4
4/1/2007	4.2	4.5
5/1/2007	4.2	4.4
6/1/2007	4.2	4.6
7/1/2007	4.2	4.7
8/1/2007	4.3	4.6
9/1/2007	4.3	4.7
10/1/2007	4.3	4.7
11/1/2007	4.3	4.7
12/1/2007	4.3	5.0
1/1/2008	4.3	5.0
2/1/2008	4.3	4.9
3/1/2008	4.3	5.1
4/1/2008	4.4	5.0
5/1/2008	4.5	5.4
6/1/2008	4.6	5.6

## Unemployment Rates

Date	Texas	United States
7/1/2008	4.8	5.8
8/1/2008	4.9	6.1
9/1/2008	5.1	6.1
10/1/2008	5.3	6.5
11/1/2008	5.6	6.8
12/1/2008	5.8	7.3
1/1/2009	6.1	7.8
2/1/2009	6.3	8.3
3/1/2009	6.5	8.7
4/1/2009	6.6	9.0
5/1/2009	7.6	9.4
6/1/2009	8.0	9.5
7/1/2009	8.2	9.5
8/1/2009	8.3	9.6
9/1/2009	8.3	9.8
10/1/2009	8.3	10.0
11/1/2009	8.3	9.9
12/1/2009	8.3	9.9
1/1/2010	8.3	9.8
2/1/2010	8.3	9.8
3/1/2010	8.3	9.9
4/1/2010	8.2	9.9
5/1/2010	8.1	9.6
6/1/2010	8.0	9.4
7/1/2010	8.0	9.4
8/1/2010	8.0	9.5
9/1/2010	8.1	9.5
10/1/2010	8.1	9.4
11/1/2010	8.1	9.8
12/1/2010	8.1	9.3
1/1/2011	8.0	9.1
2/1/2011	7.9	9.0
3/1/2011	7.9	9.0
4/1/2011	7.9	9.1
5/1/2011	7.9	9.0
6/1/2011	7.9	9.1
7/1/2011	7.9	9.0
8/1/2011	7.8	9.0

Date	Texas	United States
9/1/2011	7.7	9.0
10/1/2011	7.6	8.8
11/1/2011	7.4	8.6
12/1/2011	7.2	8.5
1/1/2012	7.1	8.3
2/1/2012	7.0	8.3
3/1/2012	6.9	8.2
4/1/2012	6.9	8.2
5/1/2012	6.9	8.2
6/1/2012	6.8	8.2
7/1/2012	6.7	8.2
8/1/2012	6.6	8.1
9/1/2012	6.5	7.8
10/1/2012	6.5	7.8
11/1/2012	6.5	7.7
12/1/2012	6.5	7.9
1/1/2013	6.5	8.0
2/1/2013	6.5	7.7
3/1/2013	6.5	7.5
4/1/2013	6.5	7.6
5/1/2013	6.4	7.5
6/1/2013	6.3	7.5
7/1/2013	6.3	7.3
8/1/2013	6.2	7.2
9/1/2013	6.1	7.2
10/1/2013	6.0	7.2
11/1/2013	5.9	6.9
12/1/2013	5.8	6.7
1/1/2014	5.7	6.6
2/1/2014	5.5	6.7
3/1/2014	5.4	6.7
4/1/2014	5.3	6.3
5/1/2014	5.2	6.3
6/1/2014	5.1	6.1
7/1/2014	5.1	6.2
8/1/2014	5.0	6.2
9/1/2014	4.9	5.9
10/1/2014	4.8	5.7

Date	Texas	United States
11/1/2014	4.7	5.8
12/1/2014	4.6	5.6
1/1/2015	4.5	5.7
2/1/2015	4.4	5.5
3/1/2015	4.4	5.5
4/1/2015	4.4	5.4
5/1/2015	4.4	5.5
6/1/2015	4.4	5.3
7/1/2015	4.4	5.2
8/1/2015	4.4	5.1
9/1/2015	4.4	5.0
10/1/2015	4.4	5.0
11/1/2015	4.5	5.0
12/1/2015	4.5	5.0
1/1/2016	4.5	4.9
2/1/2016	4.5	4.9
3/1/2016	4.5	5.0
4/1/2016	4.5	5.0
5/1/2016	4.6	4.7
6/1/2016	4.6	4.9
7/1/2016	4.7	4.9
8/1/2016	4.7	4.9
9/1/2016	4.7	5.0
10/1/2016	4.8	4.9
11/1/2016	4.8	4.6
12/1/2016	4.8	4.7
1/1/2017	4.8	4.8
2/1/2017	4.7	4.7
3/1/2017	4.6	4.5
4/1/2017	4.5	4.4
5/1/2017	4.4	4.3
6/1/2017	4.2	4.3
7/1/2017	4.1	4.3
8/1/2017	4.0	4.4
9/1/2017	4.0	4.2
10/1/2017	3.9	4.1
11/1/2017	3.9	4.1
12/1/2017	4.0	4.1

## Appendix D - R/ECAPS

### R/ECAP Definition

According to AFFH Data Documentation (Source: AFFH Data Documentation, Version 3.1, July 2016), to assist communities in identifying racially or ethnically-concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of “extreme poverty” as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. This translates into the equation shown in Figure D-1: R/ECAP Formula.

**Figure D-1: R/ECAP Formula**

$$R/ECAP_i = \text{yes ... if ...} \left\{ \begin{array}{l} PovRate_i \geq [3 * \mu_{PovRate}^{cbasa}] \\ \text{or} \\ PovRate_i \geq 0.4 \end{array} \right. \cap \left[ \frac{(Pop_i - NHW_i)}{Pop_i} \right] \geq 0.50$$

Where *i* represents census tracts, ( $\mu_{PovRate}^{cbasa}$ ) is the metropolitan/micropolitan (CBSA) mean tract poverty rate, *PovRate* is the *i*th tract poverty rate, (*NHW<sub>i</sub>*) 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 concentrations as high as 50 percent. In these areas, the racial/ethnic concentration threshold is set at 20 percent.

### Supplemental Tables

**Figure D-2: List of R/ECAPS by County in Texas, 2018**

County	Tract	Metro Status	TDHCA Region
Anderson	48001950700	Non-Metro	4
Bell	48027020800	Metro	8
Bexar	48029170200	Metro	9
Bexar	48029130600	Metro	9
Bexar	48029110500	Metro	9
Bexar	48029181303	Metro	9
Bexar	48029110600	Metro	9
Bexar	48029130500	Metro	9
Bexar	48029150800	Metro	9

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Bexar	48029130402	Metro	9
Bexar	48029141000	Metro	9
Bexar	48029150300	Metro	9
Bexar	48029180603	Metro	9
Bexar	48029170401	Metro	9
Bexar	48029130200	Metro	9
Bexar	48029170300	Metro	9
Bexar	48029180504	Metro	9
Bexar	48029160501	Metro	9
Bexar	48029161303	Metro	9
Bexar	48029170800	Metro	9
Bexar	48029171401	Metro	9
Bexar	48029170101	Metro	9
Bexar	48029170900	Metro	9
Bexar	48029180400	Metro	9
Bexar	48029151000	Metro	9
Bexar	48029131100	Metro	9
Bexar	48029181820	Metro	9
Bexar	48029161200	Metro	9
Bowie	48037010500	Metro	4
Brazos	48041000500	Metro	8
Brazos	48041001000	Metro	8
Brazos	48041001400	Metro	8
Brazos	48041001605	Metro	8
Brazos	48041000604	Metro	8
Brooks	48047950200	Non-Metro	10
Brown	48049950700	Non-Metro	2
Cameron	48061013801	Metro	11
Cameron	48061012607	Metro	11
Cameron	48061012102	Metro	11
Cameron	48061013903	Metro	11
Cameron	48061011700	Metro	11
Cameron	48061013700	Metro	11
Cameron	48061011802	Metro	11
Cameron	48061013205	Metro	11
Cameron	48061014001	Metro	11
Cameron	48061012609	Metro	11
Cameron	48061013003	Metro	11

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Cameron	48061013402	Metro	11
Cameron	48061013309	Metro	11
Cameron	48061010500	Metro	11
Cameron	48061011200	Metro	11
Cameron	48061013206	Metro	11
Cameron	48061013902	Metro	11
Cameron	48061011000	Metro	11
Cameron	48061011500	Metro	11
Cameron	48061013106	Metro	11
Cameron	48061013307	Metro	11
Cameron	48061013203	Metro	11
Cameron	48061013401	Metro	11
Cameron	48061013600	Metro	11
Cameron	48061013306	Metro	11
Cameron	48061013207	Metro	11
Cameron	48061011903	Metro	11
Cameron	48061011100	Metro	11
Cameron	48061012505	Metro	11
Cameron	48061014002	Metro	11
Cameron	48061010900	Metro	11
Cameron	48061010301	Metro	11
Cameron	48061013802	Metro	11
Cherokee	48073950500	Non-Metro	4
Dallas	48113004100	Metro	3
Dallas	48113011401	Metro	3
Dallas	48113008802	Metro	3
Dallas	48113020300	Metro	3
Dallas	48113006002	Metro	3
Dallas	48113003800	Metro	3
Dallas	48113014702	Metro	3
Dallas	48113004000	Metro	3
Dallas	48113019212	Metro	3
Dallas	48113013713	Metro	3
Dallas	48113008701	Metro	3
Dallas	48113008603	Metro	3
Dallas	48113016605	Metro	3
Dallas	48113007820	Metro	3
Dallas	48113001503	Metro	3



## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Dallas	48113012302	Metro	3
Dallas	48113004700	Metro	3
Dallas	48113002702	Metro	3
Dallas	48113008900	Metro	3
Dallas	48113009304	Metro	3
Dallas	48113006001	Metro	3
Dallas	48113007823	Metro	3
Dallas	48113009804	Metro	3
Dallas	48113006900	Metro	3
Dallas	48113019013	Metro	3
Dallas	48113002701	Metro	3
Dallas	48113020200	Metro	3
Dallas	48113011800	Metro	3
Dallas	48113012208	Metro	3
Dallas	48113020500	Metro	3
Dallas	48113019213	Metro	3
Dallas	48113007815	Metro	3
Dallas	48113011105	Metro	3
Dallas	48113011500	Metro	3
Dallas	48113003400	Metro	3
Dallas	48113008604	Metro	3
Denton	48121020601	Metro	3
Denton	48121020900	Metro	3
El Paso	48141002202	Metro	13
El Paso	48141010504	Metro	13
El Paso	48141002800	Metro	13
El Paso	48141001900	Metro	13
El Paso	48141003502	Metro	13
El Paso	48141010506	Metro	13
El Paso	48141003601	Metro	13
El Paso	48141003200	Metro	13
El Paso	48141010220	Metro	13
El Paso	48141010335	Metro	13
El Paso	48141010407	Metro	13
El Paso	48141010505	Metro	13
El Paso	48141001800	Metro	13
El Paso	48141003903	Metro	13
El Paso	48141010347	Metro	13

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
El Paso	48141002000	Metro	13
El Paso	48141010406	Metro	13
El Paso	48141001700	Metro	13
El Paso	48141002100	Metro	13
El Paso	48141000404	Metro	13
El Paso	48141001600	Metro	13
El Paso	48141010501	Metro	13
El Paso	48141000800	Metro	13
El Paso	48141001201	Metro	13
El Paso	48141010502	Metro	13
Fort Bend	48157673700	Metro	6
Galveston	48167723700	Metro	6
Galveston	48167724600	Metro	6
Galveston	48167724700	Metro	6
Harris	48201312200	Metro	6
Harris	48201212300	Metro	6
Harris	48201550100	Metro	6
Harris	48201422301	Metro	6
Harris	48201222401	Metro	6
Harris	48201222503	Metro	6
Harris	48201210400	Metro	6
Harris	48201323500	Metro	6
Harris	48201230100	Metro	6
Harris	48201421600	Metro	6
Harris	48201240600	Metro	6
Harris	48201420500	Metro	6
Harris	48201433502	Metro	6
Harris	48201211100	Metro	6
Harris	48201520602	Metro	6
Harris	48201222600	Metro	6
Harris	48201423100	Metro	6
Harris	48201331700	Metro	6
Harris	48201432701	Metro	6
Harris	48201433501	Metro	6
Harris	48201520400	Metro	6
Harris	48201332100	Metro	6
Harris	48201321200	Metro	6
Harris	48201233102	Metro	6

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Harris	48201534201	Metro	6
Harris	48201323000	Metro	6
Harris	48201532001	Metro	6
Harris	48201433100	Metro	6
Harris	48201323100	Metro	6
Harris	48201223002	Metro	6
Harris	48201550200	Metro	6
Harris	48201222501	Metro	6
Harris	48201421402	Metro	6
Harris	48201421300	Metro	6
Harris	48201311400	Metro	6
Harris	48201240100	Metro	6
Harris	48201252600	Metro	6
Harris	48201230300	Metro	6
Harris	48201211700	Metro	6
Harris	48201210800	Metro	6
Harris	48201211300	Metro	6
Harris	48201433001	Metro	6
Harris	48201521100	Metro	6
Harris	48201210500	Metro	6
Harris	48201530600	Metro	6
Harris	48201221500	Metro	6
Harris	48201521400	Metro	6
Harris	48201530700	Metro	6
Harris	48201312800	Metro	6
Harris	48201433002	Metro	6
Harris	48201220800	Metro	6
Harris	48201312300	Metro	6
Harris	48201321500	Metro	6
Harris	48201421202	Metro	6
Harris	48201221400	Metro	6
Harris	48201421101	Metro	6
Harris	48201433600	Metro	6
Harris	48201533300	Metro	6
Harris	48201211200	Metro	6
Harris	48201222700	Metro	6
Harris	48201331400	Metro	6
Harris	48201310100	Metro	6

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Harris	48201221800	Metro	6
Harris	48201453403	Metro	6
Harris	48201322000	Metro	6
Harris	48201313600	Metro	6
Hays	48209010303	Metro	7
Hays	48209010304	Metro	7
Hidalgo	48215024204	Metro	11
Hidalgo	48215021100	Metro	11
Hidalgo	48215023511	Metro	11
Hidalgo	48215022201	Metro	11
Hidalgo	48215023104	Metro	11
Hidalgo	48215024302	Metro	11
Hidalgo	48215023513	Metro	11
Hidalgo	48215022401	Metro	11
Hidalgo	48215020723	Metro	11
Hidalgo	48215024112	Metro	11
Hidalgo	48215022203	Metro	11
Hidalgo	48215020726	Metro	11
Hidalgo	48215024500	Metro	11
Hidalgo	48215020403	Metro	11
Hidalgo	48215024109	Metro	11
Hidalgo	48215021401	Metro	11
Hidalgo	48215023103	Metro	11
Hidalgo	48215020102	Metro	11
Hidalgo	48215024600	Metro	11
Hidalgo	48215023512	Metro	11
Hidalgo	48215023514	Metro	11
Hidalgo	48215024201	Metro	11
Hidalgo	48215022105	Metro	11
Hidalgo	48215024114	Metro	11
Hidalgo	48215022900	Metro	11
Hidalgo	48215023700	Metro	11
Hidalgo	48215021600	Metro	11
Hidalgo	48215021302	Metro	11
Hidalgo	48215024403	Metro	11
Hidalgo	48215020101	Metro	11
Hidalgo	48215022501	Metro	11
Hidalgo	48215024113	Metro	11

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Hidalgo	48215022104	Metro	11
Hidalgo	48215023515	Metro	11
Hidalgo	48215022003	Metro	11
Hidalgo	48215021804	Metro	11
Hidalgo	48215021000	Metro	11
Hidalgo	48215022004	Metro	11
Hidalgo	48215024108	Metro	11
Hidalgo	48215022800	Metro	11
Hidalgo	48215023102	Metro	11
Houston	48225950400	Non-Metro	5
Howard	48227950300	Non-Metro	12
Hudspeth	48229950300	Metro	13
Hunt	48231960900	Metro	3
Hunt	48231960800	Metro	3
Jasper	48241950300	Non-Metro	5
Jefferson	48245002600	Metro	5
Jefferson	48245000900	Metro	5
Jefferson	48245005900	Metro	5
Jefferson	48245000103	Metro	5
Lamar	48277000500	Non-Metro	4
Lubbock	48303001000	Metro	1
Lubbock	48303001708	Metro	1
Lubbock	48303001300	Metro	1
Lubbock	48303000202	Metro	1
Lubbock	48303000301	Metro	1
Lubbock	48303001400	Metro	1
Maverick	48323950500	Non-Metro	11
McLennan	48309001400	Metro	8
McLennan	48309001500	Metro	8
McLennan	48309001000	Metro	8
McLennan	48309001200	Metro	8
McLennan	48309000400	Metro	8
Montgomery	48339693400	Metro	6
Nacogdoches	48347950900	Non-Metro	5
Nacogdoches	48347950700	Non-Metro	5
Nueces	48355003305	Metro	10
Nueces	48355000500	Metro	10
Nueces	48355000900	Metro	10

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Nueces	48355001000	Metro	10
Nueces	48355001100	Metro	10
Nueces	48355001200	Metro	10
Nueces	48355001500	Metro	10
Potter	48375013000	Metro	1
Potter	48375010300	Metro	1
Potter	48375010600	Metro	1
Potter	48375012000	Metro	1
Smith	48423000500	Metro	4
Smith	48423000700	Metro	4
Starr	48427950204	Non-Metro	11
Starr	48427950702	Non-Metro	11
Starr	48427950401	Non-Metro	11
Starr	48427950203	Non-Metro	11
Starr	48427950107	Non-Metro	11
Starr	48427950701	Non-Metro	11
Tarrant	48439102500	Metro	3
Tarrant	48439100300	Metro	3
Tarrant	48439121905	Metro	3
Tarrant	48439103701	Metro	3
Tarrant	48439122001	Metro	3
Tarrant	48439105001	Metro	3
Tarrant	48439101403	Metro	3
Tarrant	48439104603	Metro	3
Tarrant	48439101402	Metro	3
Tarrant	48439106516	Metro	3
Tarrant	48439106202	Metro	3
Tarrant	48439104602	Metro	3
Tarrant	48439123500	Metro	3
Tarrant	48439122300	Metro	3
Tarrant	48439123100	Metro	3
Tarrant	48439122801	Metro	3
Tarrant	48439103800	Metro	3
Tarrant	48439104505	Metro	3
Tarrant	48439104804	Metro	3
Tarrant	48439101700	Metro	3
Tarrant	48439105902	Metro	3
Tarrant	48439122200	Metro	3

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Tarrant	48439105901	Metro	3
Tarrant	48439106600	Metro	3
Tarrant	48439103601	Metro	3
Tarrant	48439121903	Metro	3
Travis	48453002319	Metro	7
Travis	48453002304	Metro	7
Travis	48453002107	Metro	7
Travis	48453002318	Metro	7
Travis	48453001819	Metro	7
Travis	48453002316	Metro	7
Travis	48453002413	Metro	7
Travis	48453001812	Metro	7
Travis	48453002314	Metro	7
Travis	48453002208	Metro	7
Travis	48453002310	Metro	7
Travis	48453001811	Metro	7
Travis	48453000802	Metro	7
Travis	48453002317	Metro	7
Travis	48453001804	Metro	7
Victoria	48469000601	Metro	10
Victoria	48469000301	Metro	10
Webb	48479001003	Metro	11
Webb	48479001105	Metro	11
Webb	48479000903	Metro	11
Webb	48479000901	Metro	11
Webb	48479001402	Metro	11
Webb	48479001501	Metro	11
Webb	48479001717	Metro	11
Webb	48479000200	Metro	11
Webb	48479000800	Metro	11
Webb	48479001806	Metro	11
Webb	48479001900	Metro	11
Webb	48479001202	Metro	11
Webb	48479000700	Metro	11
Webb	48479000107	Metro	11
Webb	48479001818	Metro	11
Webb	48479001300	Metro	11
Webb	48479000106	Metro	11

## R/ECAPS

<b>County</b>	<b>Tract</b>	<b>Metro Status</b>	<b>TDHCA Region</b>
Webb	48479000601	Metro	11
Webb	48479000101	Metro	11
Webb	48479000300	Metro	11
Webb	48479001401	Metro	11
Webb	48479001706	Metro	11
Webb	48479000105	Metro	11
Webb	48479000904	Metro	11
Webb	48479000109	Metro	11
Webb	48479001815	Metro	11
Wharton	48481740700	Non-Metro	6
Wharton	48481740200	Non-Metro	6
Wichita	48485011400	Metro	2
Willacy	48489950700	Non-Metro	11
Willacy	48489950600	Non-Metro	11
Zapata	48505950301	Non-Metro	11
Zavala	48507950301	Non-Metro	11



## Appendix E - Diversity Index

### Diversity Index Definition

In order to assess diversity in Texas, TDHCA researched many different methods for describing and defining integration and segregation. The simplest is the Dissimilarity Index. However, the Dissimilarity Index and nearly all other measures required looking at small geographical areas (census tracts or smaller) and comparing them to a larger region (MSA, TDHCA Service Region, etc.). This requirement implies there was an assumption that smaller areas should, normatively, look like the larger area in which they are situated. Other options required knowing the geographical distance between pockets of certain racial and ethnic groups. This level of data simply was not available to the State at any level, let alone regionally or statewide. In order to overcome these difficulties, TDHCA chose to innovate and create a Diversity Index that did not make normative assumptions as to the “ideal” demographic makeup and was flexible enough to handle the aggregated data that was available at many different geographic sizes. Additionally, the index would be easy to understand as it would be between 0 and 1, with higher values meaning higher diversity. The mathematical form of this Diversity Index is shown in Figure E-1.

**Figure E-1: Diversity Index Formula**

$$Diversity = \frac{(\prod_{rE=1}^{RE} (1 + P_{rE})) - (2 * E)}{(\prod_{rE=1}^{RE} (1 + \frac{1}{RE})) - (2 * E)}$$

Where:

$E$  = the total number of racial or ethnic categories whose members ( $rE$ ) are mutually exclusive.

$RE$  = the total number of racial and ethnic groups in category  $E$ .

$rE$  = the individual racial or ethnic group in category  $E$ .

$P_{rE}$  = the proportion of the population that identifies as race/ethnicity  $r$  in category  $E$ .

### Diversity Index Example Case

In a simple example, an individual can be either Hispanic or Not Hispanic. There is one category of mutually exclusive ethnicities. In our example, the population will be 25% Hispanic and 75% Non-Hispanic. So in this case:

$E = 1$ . Since  $E = 1$ , we can ignore  $E$ .

$RE = 2$  (Hispanic or Not Hispanic)

$P_{Hispanic} = .25$

$P_{Non\ Hispanic} = .75$

$$\frac{((1 + .25) * (1 + .75)) - (2)}{((1 + \frac{1}{2}) * (1 + \frac{1}{2})) - (2)}$$

This simplifies to:

## Diversity Index

$$\frac{2.1875 - 2}{2.25 - 2} = \frac{.1875}{.25} = .75$$

The diversity index of this particular example area is .75. If this area had 50% Hispanic and 50% Non-Hispanic, the index would equal 1 and if the area were 100% Hispanic or 100% Non-Hispanic, the diversity index score would be 0.

To take a slightly more complicated example, keep the group of Hispanic and Non-Hispanic, and then include White and Some Other Race. A person can be only one of the two new options and can also only be either Hispanic or Not Hispanic. This means that a person can only be one of four distinct groups (White and Hispanic, White and Non-Hispanic, Some Other Race and Hispanic, Other and Non-Hispanic). Theoretically, given individual level data, these four options would just be like the first example but with four categories. However, when using aggregated data, this is likely not possible, depending upon the data source. So using our second example, let us assume that 40% of the population is Some Other Race and 60% is White, while 25% are Hispanic and 75% are Non-Hispanic:

$$E = 2$$

$$RE_1 = 2 \text{ (White and Some Other Race)}$$

$$RE_2 = 2 \text{ (Hispanic and Not Hispanic)}$$

$$P_{Hispanic} = .25$$

$$P_{Non\ Hispanic} = .75$$

$$P_{White} = .6$$

$$P_{Other} = .4$$

$$\frac{((1 + .25) * (1 + .75) * (1 + .6) * (1 + .4)) - (2 * 2)}{\left(\left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right)\right) - (2 * 2)}$$

This simplifies to:

$$\frac{4.9 - 4}{5.0625 - 4} = \frac{.9}{1.0625} \approx .847$$

In this example, the area is more diverse than in the first example. Obviously the real world is not nearly so clean. In reality, using the Census Bureau's American Community Survey data, there are 7 total options for race (White Alone, Black and African American Alone, Asian Alone, American Indian and Alaskan Native Alone, Hawaiian and Other Pacific Islander Alone, Some Other Race Alone, and Two or More Races) as well as Hispanic and Non-Hispanic. This means there are two groups of mutually exclusive categories, one with seven possibilities and one with two, and no data available to quantify the cell sizes of the 14 categories that would be created by trying to find every permutation of race and ethnicity. For this reason, the Diversity Index was the logical and appropriate measure for a state with the size and the complexity of Texas. Some tracts do not have a diversity score because of a population of zero or a lack of demographic information in ACS. Some of these tracts include airports and military bases where there may be an urban density of structures with a near-zero or zero population.

## Diversity Index

**Figure E-2: Diversity Index in Census Tracts in Texas, by County, 2012-2016**

County	Census Tract	TDHCA Region	Diversity Index	County	Census Tract	TDHCA Region	Diversity Index
Anderson	48001950100	4	0.270698	Archer	48009020200	2	0.143001
Anderson	48001950401	4	0.596174	Archer	48009020300	2	0.240295
Anderson	48001950402	4	0.571603	Armstrong	48011950100	1	0.244108
Anderson	48001950500	4	0.640971	Atascosa	48013960100	9	0.47081
Anderson	48001950600	4	0.566171	Atascosa	48013960201	9	0.435158
Anderson	48001950700	4	0.694573	Atascosa	48013960202	9	0.464317
Anderson	48001950800	4	0.523141	Atascosa	48013960300	9	0.20365
Anderson	48001950901	4	0.413647	Atascosa	48013960401	9	0.368305
Anderson	48001950902	4	0.240947	Atascosa	48013960402	9	0.496894
Anderson	48001951000	4	0.21548	Atascosa	48013960500	9	0.397664
Anderson	48001951100	4	0.30656	Atascosa	48013960600	9	0.439141
Andrews	48003950100	12	0.401311	Austin	48015760100	6	0.600087
Andrews	48003950200	12	0.498842	Austin	48015760200	6	0.623367
Andrews	48003950300	12	0.431085	Austin	48015760300	6	0.479347
Andrews	48003950400	12	0.437022	Austin	48015760400	6	0.26519
Angelina	48005000101	5	0.223333	Austin	48015760501	6	0.289081
Angelina	48005000102	5	0.333297	Austin	48015760502	6	0.488027
Angelina	48005000200	5	0.477613	Bailey	48017950100	1	0.543265
Angelina	48005000301	5	0.347348	Bandera	48019000101	9	0.241548
Angelina	48005000302	5	0.435157	Bandera	48019000102	9	0.27745
Angelina	48005000400	5	0.552713	Bandera	48019000200	9	0.238621
Angelina	48005000500	5	0.418611	Bandera	48019000300	9	0.390979
Angelina	48005000600	5	0.65599	Bandera	48019000400	9	0.236058
Angelina	48005000700	5	0.635691	Bastrop	48021950100	7	0.480432
Angelina	48005000800	5	0.492057	Bastrop	48021950200	7	0.699346
Angelina	48005000901	5	0.501928	Bastrop	48021950300	7	0.530595
Angelina	48005000902	5	0.500604	Bastrop	48021950400	7	0.453932
Angelina	48005001001	5	0.674469	Bastrop	48021950501	7	0.569291
Angelina	48005001002	5	0.484028	Bastrop	48021950502	7	0.284587
Angelina	48005001100	5	0.152287	Bastrop	48021950600	7	0.261951
Angelina	48005001200	5	0.214874	Bastrop	48021950700	7	0.503783
Angelina	48005001300	5	0.142129	Bastrop	48021950801	7	0.62877
Aransas	48007950100	10	0.251946	Bastrop	48021950802	7	0.572644
Aransas	48007950200	10	0.171178	Baylor	48023950300	2	0.203338
Aransas	48007950300	10	0.496165	Bee	48025950100	10	0.421882
Aransas	48007950400	10	0.504713	Bee	48025950201	10	0.582445
Aransas	48007950500	10	0.426421	Bee	48025950202	10	0.469994
Aransas	48007990000	10	-	Bee	48025950300	10	0.49264
Archer	48009020100	2	0.116781	Bee	48025950400	10	0.468549

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Bee	48025950500	10	0.424642
Bee	48025950600	10	0.457414
Bell	48027020100	8	0.226045
Bell	48027020201	8	0.256556
Bell	48027020202	8	0.233296
Bell	48027020300	8	0.53251
Bell	48027020401	8	0.62216
Bell	48027020402	8	0.59169
Bell	48027020500	8	0.594668
Bell	48027020600	8	0.549413
Bell	48027020701	8	0.623689
Bell	48027020702	8	0.629594
Bell	48027020800	8	0.586218
Bell	48027020900	8	0.635159
Bell	48027021000	8	0.651445
Bell	48027021100	8	0.557761
Bell	48027021201	8	0.610515
Bell	48027021202	8	0.551453
Bell	48027021203	8	0.382073
Bell	48027021301	8	0.526656
Bell	48027021302	8	0.335884
Bell	48027021303	8	0.602922
Bell	48027021400	8	0.344578
Bell	48027021500	8	0.546826
Bell	48027021601	8	0.585374
Bell	48027021602	8	0.629546
Bell	48027021700	8	0.291038
Bell	48027021800	8	0.58736
Bell	48027021901	8	0.48245
Bell	48027021903	8	0.655784
Bell	48027021904	8	0.486517
Bell	48027022000	8	0.601312
Bell	48027022101	8	0.659863
Bell	48027022103	8	0.698484
Bell	48027022104	8	0.75771
Bell	48027022105	8	0.726842
Bell	48027022200	8	0.67258
Bell	48027022300	8	0.713055
Bell	48027022401	8	0.728204
Bell	48027022402	8	0.747373

County	Census Tract	TDHCA Region	Diversity Index
Bell	48027022403	8	0.697556
Bell	48027022404	8	0.740558
Bell	48027022405	8	0.691943
Bell	48027022501	8	0.653296
Bell	48027022502	8	0.66296
Bell	48027022600	8	0.715348
Bell	48027022801	8	0.769245
Bell	48027022900	8	0.770084
Bell	48027023000	8	0.69202
Bell	48027023103	8	0.685829
Bell	48027023104	8	0.737075
Bell	48027023105	8	0.680722
Bell	48027023106	8	0.688956
Bell	48027023107	8	0.678702
Bell	48027023108	8	0.811947
Bell	48027023201	8	0.582806
Bell	48027023202	8	0.674684
Bell	48027023203	8	0.640132
Bell	48027023204	8	0.60133
Bell	48027023300	8	0.48489
Bell	48027023402	8	0.35184
Bell	48027023403	8	0.269362
Bell	48027023404	8	0.336982
Bell	48027023500	8	0.784313
Bell	48027980001	8	0.618516
Bell	48027980002	8	-
Bell	48027980003	8	-
Bexar	48029110100	9	0.576684
Bexar	48029110300	9	0.607626
Bexar	48029110500	9	0.258419
Bexar	48029110600	9	0.52199
Bexar	48029110700	9	0.341327
Bexar	48029110800	9	0.439282
Bexar	48029110900	9	0.506138
Bexar	48029111000	9	0.593153
Bexar	48029120100	9	0.679874
Bexar	48029120300	9	0.369757
Bexar	48029120400	9	0.261749
Bexar	48029120501	9	0.655794
Bexar	48029120502	9	0.595116

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029120600	9	0.488338
Bexar	48029120701	9	0.548676
Bexar	48029120702	9	0.484303
Bexar	48029120800	9	0.271048
Bexar	48029120901	9	0.519781
Bexar	48029120902	9	0.656766
Bexar	48029121000	9	0.576621
Bexar	48029121108	9	0.504918
Bexar	48029121110	9	0.528762
Bexar	48029121111	9	0.534324
Bexar	48029121112	9	0.574645
Bexar	48029121115	9	0.4549
Bexar	48029121116	9	0.593948
Bexar	48029121117	9	0.542054
Bexar	48029121118	9	0.56038
Bexar	48029121119	9	0.44329
Bexar	48029121120	9	0.49916
Bexar	48029121121	9	0.565368
Bexar	48029121122	9	0.53793
Bexar	48029121203	9	0.622676
Bexar	48029121204	9	0.659319
Bexar	48029121205	9	0.560774
Bexar	48029121206	9	0.588622
Bexar	48029121300	9	0.661057
Bexar	48029121402	9	0.687447
Bexar	48029121403	9	0.750636
Bexar	48029121404	9	0.692357
Bexar	48029121501	9	0.666641
Bexar	48029121504	9	0.687554
Bexar	48029121505	9	0.695634
Bexar	48029121506	9	0.628541
Bexar	48029121507	9	0.687067
Bexar	48029121508	9	0.750187
Bexar	48029121601	9	0.662073
Bexar	48029121604	9	0.665912
Bexar	48029121605	9	0.532255
Bexar	48029121606	9	0.599281
Bexar	48029121701	9	0.496546
Bexar	48029121702	9	0.574806
Bexar	48029121802	9	0.604947

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029121803	9	0.635509
Bexar	48029121804	9	0.606396
Bexar	48029121808	9	0.519968
Bexar	48029121809	9	0.565117
Bexar	48029121810	9	0.602506
Bexar	48029121811	9	0.486953
Bexar	48029121812	9	0.564471
Bexar	48029121813	9	0.474549
Bexar	48029121903	9	0.440781
Bexar	48029121904	9	0.610098
Bexar	48029121905	9	0.602628
Bexar	48029121906	9	0.486678
Bexar	48029121907	9	0.552637
Bexar	48029121908	9	0.518986
Bexar	48029121909	9	0.678669
Bexar	48029121910	9	0.62821
Bexar	48029130200	9	0.653511
Bexar	48029130300	9	0.460515
Bexar	48029130401	9	0.418881
Bexar	48029130402	9	0.558782
Bexar	48029130500	9	0.652343
Bexar	48029130600	9	0.600908
Bexar	48029130700	9	0.550441
Bexar	48029130800	9	0.541513
Bexar	48029130900	9	0.599375
Bexar	48029131000	9	0.564059
Bexar	48029131100	9	0.60346
Bexar	48029131200	9	0.565572
Bexar	48029131300	9	0.693071
Bexar	48029131401	9	0.689994
Bexar	48029131402	9	0.655365
Bexar	48029131503	9	0.673122
Bexar	48029131504	9	0.743673
Bexar	48029131505	9	0.714582
Bexar	48029131506	9	0.749849
Bexar	48029131507	9	0.712184
Bexar	48029131601	9	0.595331
Bexar	48029131606	9	0.768502
Bexar	48029131608	9	0.763346
Bexar	48029131609	9	0.773186

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029131610	9	0.742352
Bexar	48029131611	9	0.768337
Bexar	48029131612	9	0.757887
Bexar	48029131613	9	0.781338
Bexar	48029131614	9	0.711081
Bexar	48029131615	9	0.748865
Bexar	48029131700	9	0.470632
Bexar	48029131801	9	0.362925
Bexar	48029131802	9	0.588926
Bexar	48029140100	9	0.569202
Bexar	48029140200	9	0.404136
Bexar	48029140300	9	0.348464
Bexar	48029140400	9	0.336843
Bexar	48029140500	9	0.479221
Bexar	48029140600	9	0.446085
Bexar	48029140700	9	0.535918
Bexar	48029140800	9	0.355028
Bexar	48029140900	9	0.386854
Bexar	48029141000	9	0.44157
Bexar	48029141101	9	0.500525
Bexar	48029141102	9	0.6138
Bexar	48029141200	9	0.455964
Bexar	48029141300	9	0.577668
Bexar	48029141402	9	0.56482
Bexar	48029141403	9	0.462687
Bexar	48029141404	9	0.475862
Bexar	48029141600	9	0.399067
Bexar	48029141700	9	0.552784
Bexar	48029141800	9	0.555993
Bexar	48029141900	9	0.531876
Bexar	48029150100	9	0.441553
Bexar	48029150300	9	0.329862
Bexar	48029150400	9	0.310925
Bexar	48029150501	9	0.255385
Bexar	48029150502	9	0.36918
Bexar	48029150600	9	0.348454
Bexar	48029150700	9	0.28321
Bexar	48029150800	9	0.432612
Bexar	48029150900	9	0.445607
Bexar	48029151000	9	0.251379

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029151100	9	0.355413
Bexar	48029151200	9	0.289466
Bexar	48029151301	9	0.290766
Bexar	48029151302	9	0.290817
Bexar	48029151400	9	0.347149
Bexar	48029151500	9	0.438907
Bexar	48029151600	9	0.429459
Bexar	48029151700	9	0.46604
Bexar	48029151900	9	0.481651
Bexar	48029152000	9	0.583246
Bexar	48029152100	9	0.507757
Bexar	48029152201	9	0.542254
Bexar	48029152202	9	0.422881
Bexar	48029160100	9	0.202643
Bexar	48029160200	9	0.323075
Bexar	48029160300	9	0.263732
Bexar	48029160400	9	0.360559
Bexar	48029160501	9	0.263245
Bexar	48029160502	9	0.280919
Bexar	48029160600	9	0.171805
Bexar	48029160701	9	0.219161
Bexar	48029160702	9	0.398131
Bexar	48029160901	9	0.276649
Bexar	48029160902	9	0.254313
Bexar	48029161000	9	0.248933
Bexar	48029161100	9	0.348493
Bexar	48029161200	9	0.438726
Bexar	48029161302	9	0.278811
Bexar	48029161303	9	0.287025
Bexar	48029161304	9	0.205425
Bexar	48029161400	9	0.666683
Bexar	48029161501	9	0.460451
Bexar	48029161503	9	0.495439
Bexar	48029161504	9	0.426306
Bexar	48029161600	9	0.367245
Bexar	48029161801	9	0.387326
Bexar	48029161802	9	0.462467
Bexar	48029161901	9	0.471692
Bexar	48029161902	9	0.485045
Bexar	48029162001	9	0.451349

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029162003	9	0.392882
Bexar	48029162004	9	0.41527
Bexar	48029170101	9	0.223077
Bexar	48029170102	9	0.367334
Bexar	48029170200	9	0.277192
Bexar	48029170300	9	0.338626
Bexar	48029170401	9	0.400678
Bexar	48029170402	9	0.239016
Bexar	48029170500	9	0.393543
Bexar	48029170600	9	0.211208
Bexar	48029170700	9	0.203374
Bexar	48029170800	9	0.149046
Bexar	48029170900	9	0.294016
Bexar	48029171000	9	0.268609
Bexar	48029171100	9	0.214059
Bexar	48029171200	9	0.19858
Bexar	48029171301	9	0.26501
Bexar	48029171302	9	0.348944
Bexar	48029171401	9	0.195882
Bexar	48029171402	9	0.205371
Bexar	48029171501	9	0.292853
Bexar	48029171502	9	0.34279
Bexar	48029171601	9	0.223155
Bexar	48029171602	9	0.27261
Bexar	48029171700	9	0.463157
Bexar	48029171801	9	0.358015
Bexar	48029171802	9	0.370557
Bexar	48029171902	9	0.551429
Bexar	48029171903	9	0.448332
Bexar	48029171912	9	0.599274
Bexar	48029171913	9	0.538639
Bexar	48029171914	9	0.558196
Bexar	48029171915	9	0.517602
Bexar	48029171916	9	0.693946
Bexar	48029171917	9	0.630035
Bexar	48029171918	9	0.626966
Bexar	48029171919	9	0.5362
Bexar	48029171920	9	0.450159
Bexar	48029171921	9	0.572605
Bexar	48029171922	9	0.498335

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029171923	9	0.545555
Bexar	48029171924	9	0.635697
Bexar	48029171925	9	0.65677
Bexar	48029172002	9	0.583668
Bexar	48029172003	9	0.633015
Bexar	48029172004	9	0.624456
Bexar	48029172005	9	0.64699
Bexar	48029172006	9	0.599272
Bexar	48029172007	9	0.557484
Bexar	48029180101	9	0.301065
Bexar	48029180102	9	0.512543
Bexar	48029180201	9	0.466312
Bexar	48029180202	9	0.398894
Bexar	48029180300	9	0.303548
Bexar	48029180400	9	0.256308
Bexar	48029180501	9	0.386587
Bexar	48029180503	9	0.332901
Bexar	48029180504	9	0.247869
Bexar	48029180602	9	0.533853
Bexar	48029180603	9	0.435614
Bexar	48029180604	9	0.475127
Bexar	48029180701	9	0.591377
Bexar	48029180702	9	0.556238
Bexar	48029180800	9	0.504292
Bexar	48029180901	9	0.485767
Bexar	48029180902	9	0.431884
Bexar	48029181001	9	0.440125
Bexar	48029181003	9	0.670222
Bexar	48029181004	9	0.595203
Bexar	48029181005	9	0.610445
Bexar	48029181100	9	0.588454
Bexar	48029181200	9	0.450095
Bexar	48029181301	9	0.59114
Bexar	48029181302	9	0.565461
Bexar	48029181303	9	0.705486
Bexar	48029181402	9	0.660118
Bexar	48029181403	9	0.722697
Bexar	48029181404	9	0.690889
Bexar	48029181503	9	0.542226
Bexar	48029181504	9	0.662311

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029181505	9	0.466137
Bexar	48029181506	9	0.54186
Bexar	48029181601	9	0.459606
Bexar	48029181602	9	0.376208
Bexar	48029181703	9	0.58139
Bexar	48029181704	9	0.454132
Bexar	48029181705	9	0.638093
Bexar	48029181711	9	0.639794
Bexar	48029181712	9	0.608845
Bexar	48029181713	9	0.601032
Bexar	48029181715	9	0.536189
Bexar	48029181716	9	0.614019
Bexar	48029181718	9	0.564686
Bexar	48029181720	9	0.599031
Bexar	48029181721	9	0.499017
Bexar	48029181722	9	0.62751
Bexar	48029181723	9	0.652523
Bexar	48029181724	9	0.617657
Bexar	48029181725	9	0.616784
Bexar	48029181726	9	0.560233
Bexar	48029181727	9	0.448366
Bexar	48029181728	9	0.596313
Bexar	48029181729	9	0.624228
Bexar	48029181730	9	0.573345
Bexar	48029181731	9	0.608432
Bexar	48029181808	9	0.556836
Bexar	48029181809	9	0.630086
Bexar	48029181811	9	0.59744
Bexar	48029181813	9	0.609346
Bexar	48029181814	9	0.573968
Bexar	48029181815	9	0.609829
Bexar	48029181816	9	0.600332
Bexar	48029181817	9	0.549098
Bexar	48029181818	9	0.577279
Bexar	48029181819	9	0.683838
Bexar	48029181820	9	0.734424
Bexar	48029181821	9	0.633941
Bexar	48029181822	9	0.538509
Bexar	48029181823	9	0.698585
Bexar	48029181824	9	0.668092

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029181825	9	0.654247
Bexar	48029181826	9	0.614027
Bexar	48029181901	9	0.684883
Bexar	48029181902	9	0.475485
Bexar	48029182001	9	0.614049
Bexar	48029182002	9	0.563929
Bexar	48029182003	9	0.63848
Bexar	48029182101	9	0.407554
Bexar	48029182102	9	0.492003
Bexar	48029182103	9	0.434902
Bexar	48029182105	9	0.54017
Bexar	48029182106	9	0.591544
Bexar	48029190100	9	0.492162
Bexar	48029190200	9	0.514894
Bexar	48029190400	9	0.557728
Bexar	48029190501	9	0.393318
Bexar	48029190503	9	0.441681
Bexar	48029190504	9	0.425318
Bexar	48029190601	9	0.308454
Bexar	48029190603	9	0.322616
Bexar	48029190604	9	0.37227
Bexar	48029190700	9	0.478756
Bexar	48029190800	9	0.267255
Bexar	48029190901	9	0.509253
Bexar	48029190902	9	0.500478
Bexar	48029191003	9	0.556955
Bexar	48029191004	9	0.435726
Bexar	48029191005	9	0.372594
Bexar	48029191006	9	0.403468
Bexar	48029191101	9	0.413535
Bexar	48029191102	9	0.468181
Bexar	48029191201	9	0.432766
Bexar	48029191202	9	0.548563
Bexar	48029191303	9	0.468762
Bexar	48029191304	9	0.613377
Bexar	48029191405	9	0.511314
Bexar	48029191406	9	0.386335
Bexar	48029191408	9	0.674392
Bexar	48029191409	9	0.589049
Bexar	48029191410	9	0.59169



Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Bexar	48029191411	9	0.572288
Bexar	48029191412	9	0.368636
Bexar	48029191413	9	0.483978
Bexar	48029191503	9	0.527371
Bexar	48029191504	9	0.432983
Bexar	48029191505	9	0.435181
Bexar	48029191506	9	0.494464
Bexar	48029191701	9	0.347795
Bexar	48029191702	9	0.421338
Bexar	48029191804	9	0.40747
Bexar	48029191806	9	0.472947
Bexar	48029191807	9	0.579037
Bexar	48029191808	9	0.462394
Bexar	48029191809	9	0.540909
Bexar	48029191810	9	0.605045
Bexar	48029191811	9	0.571966
Bexar	48029191812	9	0.560702
Bexar	48029191813	9	0.532192
Bexar	48029191814	9	0.555136
Bexar	48029191815	9	0.680746
Bexar	48029191816	9	0.457483
Bexar	48029191817	9	0.597529
Bexar	48029191900	9	0.561341
Bexar	48029192000	9	0.653334
Bexar	48029192100	9	0.480251
Bexar	48029192200	9	0.627039
Bexar	48029192300	9	0.473148
Bexar	48029980001	9	-
Bexar	48029980002	9	0
Bexar	48029980003	9	0.465944
Bexar	48029980004	9	-
Bexar	48029980005	9	0.691086
Bexar	48029980100	9	0.679382
Blanco	48031950100	7	0.239805
Blanco	48031950200	7	0.37003
Borden	48033950100	12	0.098951
Bosque	48035950100	8	0.300186
Bosque	48035950200	8	0.41773
Bosque	48035950300	8	0.075995
Bosque	48035950400	8	0.196143

County	Census Tract	TDHCA Region	Diversity Index
Bosque	48035950500	8	0.404979
Bosque	48035950600	8	0.193666
Bosque	48035950700	8	0.312619
Bowie	48037010100	4	0.494644
Bowie	48037010400	4	0.483019
Bowie	48037010500	4	0.416075
Bowie	48037010600	4	0.284226
Bowie	48037010700	4	0.549847
Bowie	48037010800	4	0.609437
Bowie	48037010901	4	0.22472
Bowie	48037010902	4	0.437782
Bowie	48037011000	4	0.41447
Bowie	48037011100	4	0.512365
Bowie	48037011200	4	0.1525
Bowie	48037011300	4	0.320972
Bowie	48037011401	4	0.213805
Bowie	48037011402	4	0.124703
Bowie	48037011501	4	0.514148
Bowie	48037011502	4	0.392757
Bowie	48037011600	4	0.33193
Bowie	48037011700	4	0.121779
Brazoria	48039660100	6	0.367243
Brazoria	48039660200	6	0.468015
Brazoria	48039660300	6	0.530298
Brazoria	48039660400	6	0.602916
Brazoria	48039660500	6	0.615131
Brazoria	48039660601	6	0.673262
Brazoria	48039660602	6	0.733123
Brazoria	48039660701	6	0.700841
Brazoria	48039660702	6	0.681637
Brazoria	48039660801	6	0.684638
Brazoria	48039660802	6	0.69878
Brazoria	48039660900	6	0.528648
Brazoria	48039661000	6	0.459402
Brazoria	48039661100	6	0.515269
Brazoria	48039661200	6	0.422267
Brazoria	48039661300	6	0.47432
Brazoria	48039661400	6	0.420413
Brazoria	48039661501	6	0.452677
Brazoria	48039661502	6	0.384195

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County	Census Tract	TDHCA Region	Diversity Index
Brazoria	48039661601	6	0.421008
Brazoria	48039661602	6	0.488829
Brazoria	48039661700	6	0.339553
Brazoria	48039661800	6	0.615704
Brazoria	48039661900	6	0.636285
Brazoria	48039662000	6	0.435772
Brazoria	48039662100	6	0.613933
Brazoria	48039662200	6	0.505231
Brazoria	48039662300	6	0.471722
Brazoria	48039662400	6	0.335912
Brazoria	48039662500	6	0.561661
Brazoria	48039662600	6	0.44649
Brazoria	48039662700	6	0.434983
Brazoria	48039662800	6	0.36628
Brazoria	48039662900	6	0.49033
Brazoria	48039663000	6	0.504941
Brazoria	48039663100	6	0.528839
Brazoria	48039663200	6	0.478532
Brazoria	48039663300	6	0.458764
Brazoria	48039663400	6	0.597303
Brazoria	48039663500	6	0.561522
Brazoria	48039663600	6	0.333843
Brazoria	48039663700	6	0.443272
Brazoria	48039663800	6	0.611859
Brazoria	48039663900	6	0.600357
Brazoria	48039664000	6	0.548762
Brazoria	48039664100	6	0.532813
Brazoria	48039664200	6	0.371654
Brazoria	48039664300	6	0.536387
Brazoria	48039664400	6	0.58461
Brazoria	48039664501	6	0.458677
Brazoria	48039990000	6	-
Brazos	48041000101	8	0.499638
Brazos	48041000102	8	0.226806
Brazos	48041000103	8	0.228339
Brazos	48041000201	8	0.650205
Brazos	48041000202	8	0.651887
Brazos	48041000300	8	0.720138
Brazos	48041000400	8	0.670835
Brazos	48041000500	8	0.641003

County	Census Tract	TDHCA Region	Diversity Index
Brazos	48041000603	8	0.664405
Brazos	48041000604	8	0.692184
Brazos	48041000700	8	0.703687
Brazos	48041000800	8	0.459644
Brazos	48041000900	8	0.709025
Brazos	48041001000	8	0.699089
Brazos	48041001100	8	0.547173
Brazos	48041001301	8	0.437201
Brazos	48041001302	8	0.506962
Brazos	48041001303	8	0.52338
Brazos	48041001400	8	0.608327
Brazos	48041001601	8	0.55505
Brazos	48041001604	8	0.393246
Brazos	48041001605	8	0.68576
Brazos	48041001606	8	0.604793
Brazos	48041001701	8	0.573996
Brazos	48041001702	8	0.561456
Brazos	48041001801	8	0.400044
Brazos	48041001803	8	0.543705
Brazos	48041001804	8	0.585088
Brazos	48041001900	8	0.359579
Brazos	48041002001	8	0.292362
Brazos	48041002002	8	0.374092
Brazos	48041002006	8	0.409442
Brazos	48041002007	8	0.336538
Brazos	48041002008	8	0.387784
Brazos	48041002009	8	0.260846
Brazos	48041002010	8	0.194638
Brazos	48041002011	8	0.259554
Brazos	48041002012	8	0.37181
Brazos	48041002013	8	0.369775
Brazos	48041002014	8	0.370268
Brazos	48041002015	8	0.481678
Brazos	48041980000	8	-
Brewster	48043950300	13	0.387568
Brewster	48043950400	13	0.364515
Brewster	48043950500	13	0.483996
Briscoe	48045950200	1	0.453604
Brooks	48047950100	10	0.259324
Brooks	48047950200	10	0.272076

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County	Census Tract	TDHCA Region	Diversity Index
Brown	48049950100	2	0.127593
Brown	48049950200	2	0.148852
Brown	48049950300	2	0.216448
Brown	48049950500	2	0.304008
Brown	48049950600	2	0.568094
Brown	48049950700	2	0.603876
Brown	48049950800	2	0.543103
Brown	48049950900	2	0.424303
Brown	48049951000	2	0.346247
Brown	48049951100	2	0.35992
Brown	48049951200	2	0.26324
Brown	48049951300	2	0.376495
Burleson	48051970100	8	0.322332
Burleson	48051970200	8	0.349006
Burleson	48051970300	8	0.527205
Burleson	48051970400	8	0.528307
Burleson	48051970500	8	0.49089
Burnet	48053960100	7	0.321473
Burnet	48053960200	7	0.234371
Burnet	48053960300	7	0.389228
Burnet	48053960400	7	0.284786
Burnet	48053960500	7	0.416597
Burnet	48053960600	7	0.129727
Burnet	48053960700	7	0.470951
Burnet	48053960800	7	0.226276
Caldwell	48055960101	7	0.610242
Caldwell	48055960102	7	0.497049
Caldwell	48055960200	7	0.708716
Caldwell	48055960300	7	0.580387
Caldwell	48055960400	7	0.566642
Caldwell	48055960500	7	0.646818
Caldwell	48055960600	7	0.171561
Caldwell	48055960700	7	0.589572
Calhoun	48057000100	10	0.551439
Calhoun	48057000200	10	0.538731
Calhoun	48057000300	10	0.495825
Calhoun	48057000400	10	0.534654
Calhoun	48057000500	10	0.394676
Calhoun	48057990000	10	-
Callahan	48059030101	2	0.178377

County	Census Tract	TDHCA Region	Diversity Index
Callahan	48059030102	2	0.229933
Callahan	48059030200	2	0.177127
Cameron	48061010100	11	0.312094
Cameron	48061010201	11	0.27647
Cameron	48061010203	11	0.328402
Cameron	48061010301	11	0.184703
Cameron	48061010302	11	0.297207
Cameron	48061010401	11	0.230295
Cameron	48061010402	11	0.379872
Cameron	48061010500	11	0.098051
Cameron	48061010601	11	0.301087
Cameron	48061010602	11	0.411169
Cameron	48061010700	11	0.284053
Cameron	48061010800	11	0.315486
Cameron	48061010900	11	0.178637
Cameron	48061011000	11	0.261296
Cameron	48061011100	11	0.133598
Cameron	48061011200	11	0.250993
Cameron	48061011301	11	0.372305
Cameron	48061011302	11	0.4513
Cameron	48061011400	11	0.322421
Cameron	48061011500	11	0.212361
Cameron	48061011600	11	0.141939
Cameron	48061011700	11	0.282094
Cameron	48061011801	11	0.249375
Cameron	48061011802	11	0.303653
Cameron	48061011901	11	0.241747
Cameron	48061011902	11	0.348065
Cameron	48061011903	11	0.153296
Cameron	48061012001	11	0.411783
Cameron	48061012002	11	0.363795
Cameron	48061012101	11	0.384654
Cameron	48061012102	11	0.187755
Cameron	48061012200	11	0.300757
Cameron	48061012301	11	0.496402
Cameron	48061012304	11	0.454374
Cameron	48061012305	11	0.318298
Cameron	48061012401	11	0.267947
Cameron	48061012402	11	0.323864
Cameron	48061012504	11	0.168325

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County	Census Tract	TDHCA Region	Diversity Index
Cameron	48061012505	11	0.133726
Cameron	48061012506	11	0.431537
Cameron	48061012507	11	0.093966
Cameron	48061012508	11	0.181916
Cameron	48061012607	11	0.144663
Cameron	48061012608	11	0.203175
Cameron	48061012609	11	0.150494
Cameron	48061012612	11	0.204962
Cameron	48061012613	11	0.22916
Cameron	48061012700	11	0.150761
Cameron	48061012800	11	0.052592
Cameron	48061012900	11	0.297641
Cameron	48061013002	11	0.184547
Cameron	48061013003	11	0.089655
Cameron	48061013004	11	0.193588
Cameron	48061013102	11	0.156023
Cameron	48061013104	11	0.191972
Cameron	48061013106	11	0.122914
Cameron	48061013203	11	0.127219
Cameron	48061013204	11	0.228299
Cameron	48061013205	11	0.141163
Cameron	48061013206	11	0.130143
Cameron	48061013207	11	0.244756
Cameron	48061013303	11	0.19081
Cameron	48061013305	11	0.126875
Cameron	48061013306	11	0.075075
Cameron	48061013307	11	0.018775
Cameron	48061013308	11	0.084266
Cameron	48061013309	11	0.099237
Cameron	48061013401	11	0.188331
Cameron	48061013402	11	0.083005
Cameron	48061013500	11	0.278894
Cameron	48061013600	11	0.112414
Cameron	48061013700	11	0.078407
Cameron	48061013801	11	0.078981
Cameron	48061013802	11	0.114008
Cameron	48061013901	11	0.050424
Cameron	48061013902	11	0.082678
Cameron	48061013903	11	0.089555
Cameron	48061014001	11	0.240589

County	Census Tract	TDHCA Region	Diversity Index
Cameron	48061014002	11	0.105459
Cameron	48061014100	11	0.136606
Cameron	48061014200	11	0.208358
Cameron	48061014300	11	0.186151
Cameron	48061014400	11	0.220615
Cameron	48061014500	11	0.214187
Cameron	48061980001	11	-
Cameron	48061980100	11	-
Cameron	48061990000	11	-
Camp	48063950101	4	0.507874
Camp	48063950102	4	0.399356
Camp	48063950200	4	0.691576
Carson	48065950100	1	0.229353
Carson	48065950200	1	0.17411
Cass	48067950100	4	0.276453
Cass	48067950200	4	0.24721
Cass	48067950300	4	0.302638
Cass	48067950400	4	0.439737
Cass	48067950500	4	0.112345
Cass	48067950600	4	0.341326
Cass	48067950700	4	0.318483
Castro	48069950100	1	0.405503
Castro	48069950200	1	0.444795
Castro	48069950300	1	0.536495
Chambers	48071710100	6	0.296759
Chambers	48071710200	6	0.429982
Chambers	48071710300	6	0.463166
Chambers	48071710401	6	0.390658
Chambers	48071710500	6	0.569374
Chambers	48071710600	6	-
Chambers	48071990000	6	-
Cherokee	48073950100	4	0.508307
Cherokee	48073950200	4	0.239207
Cherokee	48073950300	4	0.372373
Cherokee	48073950400	4	0.450878
Cherokee	48073950500	4	0.644234
Cherokee	48073950600	4	0.480391
Cherokee	48073950700	4	0.641987
Cherokee	48073950801	4	0.311202
Cherokee	48073950802	4	0.385417

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County	Census Tract	TDHCA Region	Diversity Index
Cherokee	48073950900	4	0.558333
Cherokee	48073951000	4	0.472352
Cherokee	48073951100	4	0.332613
Childress	48075950100	1	0.616063
Childress	48075950200	1	0.397708
Clay	48077030200	2	0.09811
Clay	48077030301	2	0.156496
Clay	48077030302	2	0.175266
Cochran	48079950100	1	0.520663
Coke	48081950100	12	0.337557
Coke	48081950200	12	0.301776
Coleman	48083950300	2	0.370564
Coleman	48083950600	2	0.173325
Coleman	48083950700	2	0.258541
Collin	48085030100	3	0.155637
Collin	48085030201	3	0.334342
Collin	48085030202	3	0.272474
Collin	48085030203	3	0.390355
Collin	48085030301	3	0.454798
Collin	48085030302	3	0.232271
Collin	48085030303	3	0.289957
Collin	48085030304	3	0.253091
Collin	48085030305	3	0.273857
Collin	48085030403	3	0.489899
Collin	48085030404	3	0.545197
Collin	48085030405	3	0.531316
Collin	48085030406	3	0.663186
Collin	48085030407	3	0.393164
Collin	48085030408	3	0.618894
Collin	48085030504	3	0.496666
Collin	48085030505	3	0.572349
Collin	48085030506	3	0.364976
Collin	48085030507	3	0.426722
Collin	48085030508	3	0.406553
Collin	48085030509	3	0.552481
Collin	48085030510	3	0.569974
Collin	48085030511	3	0.501847
Collin	48085030512	3	0.455184
Collin	48085030513	3	0.549373
Collin	48085030514	3	0.461785

County	Census Tract	TDHCA Region	Diversity Index
Collin	48085030515	3	0.502446
Collin	48085030516	3	0.576564
Collin	48085030517	3	0.436653
Collin	48085030518	3	0.498174
Collin	48085030519	3	0.577824
Collin	48085030520	3	0.628272
Collin	48085030521	3	0.611607
Collin	48085030522	3	0.592113
Collin	48085030523	3	0.580341
Collin	48085030524	3	0.617272
Collin	48085030525	3	0.225576
Collin	48085030526	3	0.445612
Collin	48085030527	3	0.417658
Collin	48085030528	3	0.334463
Collin	48085030529	3	0.442626
Collin	48085030530	3	0.235573
Collin	48085030531	3	0.271523
Collin	48085030601	3	0.30903
Collin	48085030603	3	0.564334
Collin	48085030604	3	0.587872
Collin	48085030605	3	0.583927
Collin	48085030701	3	0.61034
Collin	48085030702	3	0.539003
Collin	48085030801	3	0.529126
Collin	48085030802	3	0.623784
Collin	48085030900	3	0.524776
Collin	48085031001	3	0.406846
Collin	48085031003	3	0.490793
Collin	48085031004	3	0.455741
Collin	48085031100	3	0.363779
Collin	48085031201	3	0.353432
Collin	48085031202	3	0.382357
Collin	48085031308	3	0.508958
Collin	48085031309	3	0.539055
Collin	48085031310	3	0.458283
Collin	48085031311	3	0.471388
Collin	48085031312	3	0.453834
Collin	48085031313	3	0.575687
Collin	48085031314	3	0.281454
Collin	48085031315	3	0.626949

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Collin	48085031316	3	0.620964
Collin	48085031317	3	0.555684
Collin	48085031405	3	0.514096
Collin	48085031406	3	0.441831
Collin	48085031407	3	0.125217
Collin	48085031408	3	0.467688
Collin	48085031409	3	0.525199
Collin	48085031410	3	0.488212
Collin	48085031411	3	0.598678
Collin	48085031504	3	0.314869
Collin	48085031505	3	0.447939
Collin	48085031506	3	0.567588
Collin	48085031507	3	0.530164
Collin	48085031508	3	0.524827
Collin	48085031611	3	0.615783
Collin	48085031612	3	0.413609
Collin	48085031613	3	0.255851
Collin	48085031621	3	0.456064
Collin	48085031622	3	0.509139
Collin	48085031623	3	0.609686
Collin	48085031624	3	0.724504
Collin	48085031625	3	0.37269
Collin	48085031626	3	0.351697
Collin	48085031627	3	0.458498
Collin	48085031628	3	0.432876
Collin	48085031629	3	0.556322
Collin	48085031630	3	0.41464
Collin	48085031631	3	0.604747
Collin	48085031632	3	0.528909
Collin	48085031633	3	0.534546
Collin	48085031634	3	0.596362
Collin	48085031635	3	0.649623
Collin	48085031636	3	0.496269
Collin	48085031637	3	0.387054
Collin	48085031638	3	0.502989
Collin	48085031639	3	0.575574
Collin	48085031640	3	0.59594
Collin	48085031641	3	0.440007
Collin	48085031642	3	0.492785
Collin	48085031643	3	0.496881

County	Census Tract	TDHCA Region	Diversity Index
Collin	48085031645	3	0.297031
Collin	48085031646	3	0.423473
Collin	48085031647	3	0.426875
Collin	48085031648	3	0.449181
Collin	48085031649	3	0.323869
Collin	48085031652	3	0.56061
Collin	48085031653	3	0.564917
Collin	48085031654	3	0.456412
Collin	48085031655	3	0.550781
Collin	48085031656	3	0.500303
Collin	48085031657	3	0.486708
Collin	48085031658	3	0.521853
Collin	48085031659	3	0.595888
Collin	48085031660	3	0.616417
Collin	48085031661	3	0.522569
Collin	48085031662	3	0.57373
Collin	48085031663	3	0.533599
Collin	48085031664	3	0.46173
Collin	48085031704	3	0.606355
Collin	48085031706	3	0.280388
Collin	48085031708	3	0.593391
Collin	48085031709	3	0.577581
Collin	48085031711	3	0.433478
Collin	48085031712	3	0.721107
Collin	48085031713	3	0.723802
Collin	48085031714	3	0.744173
Collin	48085031715	3	0.452384
Collin	48085031716	3	0.476484
Collin	48085031717	3	0.698579
Collin	48085031718	3	0.359304
Collin	48085031719	3	0.536051
Collin	48085031720	3	0.74499
Collin	48085031802	3	0.547188
Collin	48085031804	3	0.461465
Collin	48085031805	3	0.326003
Collin	48085031806	3	0.54812
Collin	48085031807	3	0.322879
Collin	48085031900	3	0.641716
Collin	48085032003	3	0.646643
Collin	48085032004	3	0.59055

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Collin	48085032008	3	0.533096
Collin	48085032009	3	0.581391
Collin	48085032010	3	0.718132
Collin	48085032011	3	0.629128
Collin	48085032012	3	0.498455
Collin	48085032013	3	0.799863
Collingsworth	48087950300	1	0.536558
Colorado	48089750100	6	0.693898
Colorado	48089750200	6	0.371298
Colorado	48089750300	6	0.445475
Colorado	48089750400	6	0.476112
Colorado	48089750500	6	0.515516
Comal	48091310100	9	0.502667
Comal	48091310200	9	0.506563
Comal	48091310300	9	0.288426
Comal	48091310401	9	0.469112
Comal	48091310403	9	0.517146
Comal	48091310404	9	0.500612
Comal	48091310501	9	0.506301
Comal	48091310502	9	0.483158
Comal	48091310503	9	0.368919
Comal	48091310603	9	0.308448
Comal	48091310604	9	0.355501
Comal	48091310605	9	0.320717
Comal	48091310606	9	0.288269
Comal	48091310607	9	0.230272
Comal	48091310608	9	0.382289
Comal	48091310701	9	0.201592
Comal	48091310702	9	0.223648
Comal	48091310703	9	0.279739
Comal	48091310704	9	0.470038
Comal	48091310801	9	0.363206
Comal	48091310802	9	0.484484
Comal	48091310901	9	0.224983
Comal	48091310902	9	0.385016
Comal	48091310903	9	0.21763
Comanche	48093950100	2	0.337134
Comanche	48093950200	2	0.105107
Comanche	48093950300	2	0.445245
Comanche	48093950400	2	0.407791

County	Census Tract	TDHCA Region	Diversity Index
Concho	48095950300	12	0.466307
Cooke	48097000100	3	0.280454
Cooke	48097000200	3	0.139221
Cooke	48097000400	3	0.558575
Cooke	48097000500	3	0.477132
Cooke	48097000600	3	0.498823
Cooke	48097000700	3	0.093805
Cooke	48097000900	3	0.179251
Cooke	48097001100	3	0.437527
Coryell	48099010101	8	0.252733
Coryell	48099010102	8	0.127297
Coryell	48099010201	8	0.719058
Coryell	48099010202	8	0.292486
Coryell	48099010300	8	0.478948
Coryell	48099010400	8	0.265017
Coryell	48099010501	8	0.645629
Coryell	48099010502	8	0.640651
Coryell	48099010503	8	0.639773
Coryell	48099010504	8	0.615287
Coryell	48099010601	8	0.687502
Coryell	48099010603	8	0.606074
Coryell	48099010604	8	0.573832
Coryell	48099010701	8	0.503277
Coryell	48099010702	8	0.523901
Coryell	48099010802	8	0.456231
Coryell	48099010803	8	0.507565
Coryell	48099010804	8	0.572762
Coryell	48099980000	8	0.432869
Cottle	48101950100	2	0.564936
Crane	48103950100	12	0.597075
Crockett	48105950100	12	0.510606
Crosby	48107950100	1	0.549617
Crosby	48107950200	1	0.45562
Crosby	48107950300	1	0.469917
Culberson	48109950300	13	0.49879
Dallam	48111950100	1	0.300363
Dallam	48111950300	1	0.514183
Dallas	48113000100	3	0.342032
Dallas	48113000201	3	0.220045
Dallas	48113000202	3	0.362134

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113000300	3	0.216039
Dallas	48113000401	3	0.755807
Dallas	48113000404	3	0.674396
Dallas	48113000405	3	0.759294
Dallas	48113000406	3	0.597974
Dallas	48113000500	3	0.582046
Dallas	48113000601	3	0.694132
Dallas	48113000603	3	0.375404
Dallas	48113000605	3	0.485523
Dallas	48113000606	3	0.206138
Dallas	48113000701	3	0.376224
Dallas	48113000702	3	0.351132
Dallas	48113000800	3	0.741796
Dallas	48113000900	3	0.595805
Dallas	48113001001	3	0.350186
Dallas	48113001002	3	0.616184
Dallas	48113001101	3	0.353782
Dallas	48113001102	3	0.176008
Dallas	48113001202	3	0.562891
Dallas	48113001203	3	0.472507
Dallas	48113001204	3	0.170266
Dallas	48113001301	3	0.390152
Dallas	48113001302	3	0.658202
Dallas	48113001400	3	0.590043
Dallas	48113001502	3	0.57883
Dallas	48113001503	3	0.634018
Dallas	48113001504	3	0.731196
Dallas	48113001600	3	0.62696
Dallas	48113001701	3	0.522726
Dallas	48113001703	3	0.287708
Dallas	48113001704	3	0.21278
Dallas	48113001800	3	0.314346
Dallas	48113001900	3	0.34124
Dallas	48113002000	3	0.622597
Dallas	48113002100	3	0.622244
Dallas	48113002200	3	0.549399
Dallas	48113002400	3	0.349221
Dallas	48113002500	3	0.522546
Dallas	48113002701	3	0.312287
Dallas	48113002702	3	0.240626

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113003101	3	0.496218
Dallas	48113003400	3	0.438355
Dallas	48113003700	3	0.351759
Dallas	48113003800	3	0.17078
Dallas	48113003901	3	0.069229
Dallas	48113003902	3	0.520068
Dallas	48113004000	3	0.182945
Dallas	48113004100	3	0.421002
Dallas	48113004201	3	0.561835
Dallas	48113004202	3	0.547198
Dallas	48113004300	3	0.547004
Dallas	48113004400	3	0.526583
Dallas	48113004500	3	0.337429
Dallas	48113004600	3	0.554699
Dallas	48113004700	3	0.445013
Dallas	48113004800	3	0.258024
Dallas	48113004900	3	0.445209
Dallas	48113005000	3	0.402439
Dallas	48113005100	3	0.24917
Dallas	48113005200	3	0.361119
Dallas	48113005300	3	0.295397
Dallas	48113005400	3	0.467911
Dallas	48113005500	3	0.478391
Dallas	48113005600	3	0.394905
Dallas	48113005700	3	0.52715
Dallas	48113005901	3	0.417661
Dallas	48113005902	3	0.433421
Dallas	48113006001	3	0.338739
Dallas	48113006002	3	0.611834
Dallas	48113006100	3	0.551155
Dallas	48113006200	3	0.598684
Dallas	48113006301	3	0.388916
Dallas	48113006302	3	0.353074
Dallas	48113006401	3	0.389042
Dallas	48113006402	3	0.285741
Dallas	48113006501	3	0.259101
Dallas	48113006502	3	0.286178
Dallas	48113006700	3	0.345836
Dallas	48113006800	3	0.509832
Dallas	48113006900	3	0.378456



Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113007101	3	0.264308
Dallas	48113007102	3	0.681063
Dallas	48113007201	3	0.480514
Dallas	48113007202	3	0.451728
Dallas	48113007301	3	0.099541
Dallas	48113007302	3	0.422276
Dallas	48113007601	3	0.387167
Dallas	48113007604	3	0.2264
Dallas	48113007605	3	0.182453
Dallas	48113007700	3	0.163121
Dallas	48113007801	3	0.179539
Dallas	48113007804	3	0.539477
Dallas	48113007805	3	0.562865
Dallas	48113007809	3	0.461087
Dallas	48113007810	3	0.519029
Dallas	48113007811	3	0.548706
Dallas	48113007812	3	0.270239
Dallas	48113007815	3	0.773008
Dallas	48113007818	3	0.691893
Dallas	48113007819	3	0.697143
Dallas	48113007820	3	0.68388
Dallas	48113007821	3	0.664422
Dallas	48113007822	3	0.56249
Dallas	48113007823	3	0.657021
Dallas	48113007824	3	0.244926
Dallas	48113007825	3	0.634108
Dallas	48113007826	3	0.682639
Dallas	48113007827	3	0.596044
Dallas	48113007902	3	0.272264
Dallas	48113007903	3	0.204905
Dallas	48113007906	3	0.036128
Dallas	48113007909	3	0.656666
Dallas	48113007910	3	0.554542
Dallas	48113007911	3	0.492991
Dallas	48113007912	3	0.37134
Dallas	48113007913	3	0.489305
Dallas	48113007914	3	0.499584
Dallas	48113008000	3	0.223526
Dallas	48113008100	3	0.294219
Dallas	48113008200	3	0.488022

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113008400	3	0.344544
Dallas	48113008500	3	0.433007
Dallas	48113008603	3	0.368794
Dallas	48113008604	3	0.397474
Dallas	48113008701	3	0.108567
Dallas	48113008703	3	0.415004
Dallas	48113008704	3	0.195696
Dallas	48113008705	3	0.454383
Dallas	48113008801	3	0.384375
Dallas	48113008802	3	0.479612
Dallas	48113008900	3	0.409204
Dallas	48113009000	3	0.559566
Dallas	48113009101	3	0.484897
Dallas	48113009103	3	0.461864
Dallas	48113009104	3	0.458376
Dallas	48113009105	3	0.496288
Dallas	48113009201	3	0.485337
Dallas	48113009202	3	0.510472
Dallas	48113009301	3	0.220049
Dallas	48113009303	3	0.338439
Dallas	48113009304	3	0.38692
Dallas	48113009401	3	0.544287
Dallas	48113009402	3	0.234117
Dallas	48113009500	3	0.264595
Dallas	48113009603	3	0.350873
Dallas	48113009604	3	0.459644
Dallas	48113009605	3	0.723021
Dallas	48113009607	3	0.475168
Dallas	48113009608	3	0.483672
Dallas	48113009609	3	0.15589
Dallas	48113009610	3	0.379682
Dallas	48113009611	3	0.540571
Dallas	48113009701	3	0.565902
Dallas	48113009702	3	0.243439
Dallas	48113009802	3	0.465807
Dallas	48113009803	3	0.582482
Dallas	48113009804	3	0.41443
Dallas	48113009900	3	0.724568
Dallas	48113010000	3	0.616738
Dallas	48113010101	3	0.619324

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113010102	3	0.359538
Dallas	48113010500	3	0.612278
Dallas	48113010601	3	0.428078
Dallas	48113010602	3	0.578703
Dallas	48113010701	3	0.313631
Dallas	48113010703	3	0.418146
Dallas	48113010704	3	0.45683
Dallas	48113010801	3	0.416735
Dallas	48113010803	3	0.580801
Dallas	48113010804	3	0.548132
Dallas	48113010805	3	0.556139
Dallas	48113010902	3	0.223903
Dallas	48113010903	3	0.57912
Dallas	48113010904	3	0.332069
Dallas	48113011001	3	0.268745
Dallas	48113011002	3	0.363568
Dallas	48113011101	3	0.271235
Dallas	48113011103	3	0.541302
Dallas	48113011104	3	0.44894
Dallas	48113011105	3	0.429767
Dallas	48113011200	3	0.303014
Dallas	48113011300	3	0.145261
Dallas	48113011401	3	0.303684
Dallas	48113011500	3	0.496914
Dallas	48113011601	3	0.461359
Dallas	48113011602	3	0.510037
Dallas	48113011701	3	0.522576
Dallas	48113011702	3	0.424243
Dallas	48113011800	3	0.575818
Dallas	48113011900	3	0.47863
Dallas	48113012000	3	0.443643
Dallas	48113012100	3	0.525197
Dallas	48113012204	3	0.697917
Dallas	48113012206	3	0.637819
Dallas	48113012207	3	0.55472
Dallas	48113012208	3	0.643102
Dallas	48113012209	3	0.713753
Dallas	48113012210	3	0.624837
Dallas	48113012211	3	0.647052
Dallas	48113012301	3	0.623864

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113012302	3	0.716879
Dallas	48113012400	3	0.616142
Dallas	48113012500	3	0.720974
Dallas	48113012601	3	0.711389
Dallas	48113012603	3	0.671319
Dallas	48113012604	3	0.742583
Dallas	48113012701	3	0.656347
Dallas	48113012702	3	0.667389
Dallas	48113012800	3	0.501454
Dallas	48113012900	3	0.391535
Dallas	48113013004	3	0.230659
Dallas	48113013005	3	0.16986
Dallas	48113013007	3	0.667395
Dallas	48113013008	3	0.492192
Dallas	48113013009	3	0.636089
Dallas	48113013010	3	0.636695
Dallas	48113013011	3	0.599117
Dallas	48113013101	3	0.118348
Dallas	48113013102	3	0.085151
Dallas	48113013104	3	0.317109
Dallas	48113013105	3	0.645106
Dallas	48113013200	3	0.297998
Dallas	48113013300	3	0.251072
Dallas	48113013400	3	0.231162
Dallas	48113013500	3	0.172084
Dallas	48113013605	3	0.42249
Dallas	48113013606	3	0.648955
Dallas	48113013607	3	0.418003
Dallas	48113013608	3	0.148633
Dallas	48113013609	3	0.605851
Dallas	48113013610	3	0.636328
Dallas	48113013611	3	0.342369
Dallas	48113013615	3	0.708448
Dallas	48113013616	3	0.66479
Dallas	48113013617	3	0.398672
Dallas	48113013618	3	0.413754
Dallas	48113013619	3	0.302679
Dallas	48113013620	3	0.620979
Dallas	48113013621	3	0.661614
Dallas	48113013622	3	0.678028

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113013623	3	0.726427
Dallas	48113013624	3	0.733166
Dallas	48113013625	3	0.680816
Dallas	48113013626	3	0.675428
Dallas	48113013711	3	0.616421
Dallas	48113013712	3	0.634768
Dallas	48113013713	3	0.49185
Dallas	48113013714	3	0.500395
Dallas	48113013715	3	0.530372
Dallas	48113013716	3	0.670284
Dallas	48113013717	3	0.49453
Dallas	48113013718	3	0.518473
Dallas	48113013719	3	0.679465
Dallas	48113013720	3	0.672269
Dallas	48113013721	3	0.426489
Dallas	48113013722	3	0.66713
Dallas	48113013725	3	0.657962
Dallas	48113013726	3	0.690403
Dallas	48113013727	3	0.604844
Dallas	48113013803	3	0.469003
Dallas	48113013804	3	0.65569
Dallas	48113013805	3	0.717125
Dallas	48113013806	3	0.682748
Dallas	48113013901	3	0.617597
Dallas	48113013902	3	0.516078
Dallas	48113014001	3	0.632346
Dallas	48113014002	3	0.268443
Dallas	48113014103	3	0.739937
Dallas	48113014113	3	0.672624
Dallas	48113014114	3	0.812409
Dallas	48113014115	3	0.789745
Dallas	48113014116	3	0.749091
Dallas	48113014119	3	0.422895
Dallas	48113014120	3	0.425386
Dallas	48113014121	3	0.567233
Dallas	48113014123	3	0.458401
Dallas	48113014124	3	0.628832
Dallas	48113014126	3	0.536308
Dallas	48113014127	3	0.53901
Dallas	48113014128	3	0.669257

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113014129	3	0.485942
Dallas	48113014130	3	0.60789
Dallas	48113014131	3	0.748617
Dallas	48113014132	3	0.653536
Dallas	48113014133	3	0.698093
Dallas	48113014134	3	0.590927
Dallas	48113014135	3	0.486076
Dallas	48113014136	3	0.70242
Dallas	48113014137	3	0.571078
Dallas	48113014138	3	0.617888
Dallas	48113014203	3	0.701551
Dallas	48113014204	3	0.61284
Dallas	48113014205	3	0.446732
Dallas	48113014206	3	0.66233
Dallas	48113014302	3	0.6228
Dallas	48113014306	3	0.649163
Dallas	48113014307	3	0.630735
Dallas	48113014308	3	0.70718
Dallas	48113014309	3	0.772696
Dallas	48113014310	3	0.751981
Dallas	48113014311	3	0.462047
Dallas	48113014312	3	0.68066
Dallas	48113014403	3	0.774953
Dallas	48113014405	3	0.644178
Dallas	48113014406	3	0.532863
Dallas	48113014407	3	0.702844
Dallas	48113014408	3	0.777625
Dallas	48113014501	3	0.644726
Dallas	48113014502	3	0.543362
Dallas	48113014601	3	0.624161
Dallas	48113014602	3	0.584908
Dallas	48113014603	3	0.605635
Dallas	48113014701	3	0.536014
Dallas	48113014702	3	0.620972
Dallas	48113014703	3	0.659043
Dallas	48113014901	3	0.568762
Dallas	48113014902	3	0.662056
Dallas	48113015000	3	0.656796
Dallas	48113015100	3	0.739627
Dallas	48113015202	3	0.555335

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113015204	3	0.679794
Dallas	48113015205	3	0.590026
Dallas	48113015206	3	0.636201
Dallas	48113015303	3	0.436605
Dallas	48113015304	3	0.629347
Dallas	48113015305	3	0.714986
Dallas	48113015306	3	0.728623
Dallas	48113015401	3	0.630516
Dallas	48113015403	3	0.65887
Dallas	48113015404	3	0.520874
Dallas	48113015500	3	0.659899
Dallas	48113015600	3	0.370594
Dallas	48113015700	3	0.373774
Dallas	48113015800	3	0.367336
Dallas	48113015900	3	0.616135
Dallas	48113016001	3	0.534565
Dallas	48113016002	3	0.525052
Dallas	48113016100	3	0.635184
Dallas	48113016201	3	0.515218
Dallas	48113016202	3	0.487321
Dallas	48113016301	3	0.553316
Dallas	48113016302	3	0.5198
Dallas	48113016401	3	0.713742
Dallas	48113016406	3	0.579792
Dallas	48113016407	3	0.566177
Dallas	48113016408	3	0.661319
Dallas	48113016409	3	0.728721
Dallas	48113016410	3	0.704486
Dallas	48113016411	3	0.698425
Dallas	48113016412	3	0.698148
Dallas	48113016413	3	0.7288
Dallas	48113016502	3	0.630272
Dallas	48113016509	3	0.631064
Dallas	48113016510	3	0.64297
Dallas	48113016511	3	0.527134
Dallas	48113016513	3	0.631898
Dallas	48113016514	3	0.58018
Dallas	48113016516	3	0.614518
Dallas	48113016517	3	0.692384
Dallas	48113016518	3	0.647035

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113016519	3	0.616862
Dallas	48113016520	3	0.63045
Dallas	48113016521	3	0.651013
Dallas	48113016522	3	0.658576
Dallas	48113016523	3	0.618962
Dallas	48113016605	3	0.517828
Dallas	48113016606	3	0.510477
Dallas	48113016607	3	0.258609
Dallas	48113016610	3	0.336088
Dallas	48113016611	3	0.480368
Dallas	48113016612	3	0.36096
Dallas	48113016615	3	0.517837
Dallas	48113016616	3	0.558264
Dallas	48113016617	3	0.480245
Dallas	48113016618	3	0.470586
Dallas	48113016619	3	0.41353
Dallas	48113016620	3	0.4877
Dallas	48113016621	3	0.504617
Dallas	48113016622	3	0.419254
Dallas	48113016623	3	0.551974
Dallas	48113016624	3	0.455869
Dallas	48113016625	3	0.473533
Dallas	48113016626	3	0.557145
Dallas	48113016701	3	0.163501
Dallas	48113016703	3	0.473287
Dallas	48113016704	3	0.465066
Dallas	48113016705	3	0.385798
Dallas	48113016802	3	0.585106
Dallas	48113016803	3	0.437993
Dallas	48113016804	3	0.32715
Dallas	48113016902	3	0.656143
Dallas	48113016903	3	0.632915
Dallas	48113017001	3	0.57752
Dallas	48113017003	3	0.593056
Dallas	48113017004	3	0.588445
Dallas	48113017101	3	0.631896
Dallas	48113017102	3	0.648955
Dallas	48113017201	3	0.495711
Dallas	48113017202	3	0.612317
Dallas	48113017301	3	0.639612

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113017303	3	0.64437
Dallas	48113017304	3	0.703452
Dallas	48113017305	3	0.652439
Dallas	48113017306	3	0.628926
Dallas	48113017400	3	0.571634
Dallas	48113017500	3	0.603707
Dallas	48113017602	3	0.606474
Dallas	48113017604	3	0.560091
Dallas	48113017605	3	0.524042
Dallas	48113017606	3	0.618466
Dallas	48113017702	3	0.6651
Dallas	48113017703	3	0.653446
Dallas	48113017704	3	0.582287
Dallas	48113017804	3	0.664985
Dallas	48113017805	3	0.626768
Dallas	48113017806	3	0.643886
Dallas	48113017807	3	0.612952
Dallas	48113017808	3	0.60678
Dallas	48113017811	3	0.621745
Dallas	48113017812	3	0.677994
Dallas	48113017813	3	0.679298
Dallas	48113017814	3	0.716222
Dallas	48113017900	3	0.654356
Dallas	48113018001	3	0.677349
Dallas	48113018002	3	0.58297
Dallas	48113018104	3	0.589113
Dallas	48113018105	3	0.731672
Dallas	48113018110	3	0.378214
Dallas	48113018111	3	0.720361
Dallas	48113018118	3	0.723369
Dallas	48113018120	3	0.794958
Dallas	48113018121	3	0.776605
Dallas	48113018122	3	0.635708
Dallas	48113018123	3	0.726827
Dallas	48113018124	3	0.605112
Dallas	48113018126	3	0.748941
Dallas	48113018127	3	0.718202
Dallas	48113018128	3	0.756771
Dallas	48113018129	3	0.664854
Dallas	48113018130	3	0.661162

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113018132	3	0.671772
Dallas	48113018133	3	0.471574
Dallas	48113018134	3	0.595516
Dallas	48113018135	3	0.635141
Dallas	48113018136	3	0.472125
Dallas	48113018137	3	0.72226
Dallas	48113018138	3	0.75785
Dallas	48113018139	3	0.639532
Dallas	48113018140	3	0.653784
Dallas	48113018141	3	0.663816
Dallas	48113018142	3	0.728486
Dallas	48113018203	3	0.742316
Dallas	48113018204	3	0.61821
Dallas	48113018205	3	0.728387
Dallas	48113018206	3	0.586907
Dallas	48113018300	3	0.676055
Dallas	48113018401	3	0.740284
Dallas	48113018402	3	0.57811
Dallas	48113018403	3	0.701729
Dallas	48113018501	3	0.705484
Dallas	48113018503	3	0.382829
Dallas	48113018505	3	0.645464
Dallas	48113018506	3	0.575993
Dallas	48113018600	3	0.566348
Dallas	48113018700	3	0.622853
Dallas	48113018801	3	0.655834
Dallas	48113018802	3	0.718725
Dallas	48113018900	3	0.787087
Dallas	48113019004	3	0.711326
Dallas	48113019013	3	0.694315
Dallas	48113019014	3	0.745656
Dallas	48113019016	3	0.756254
Dallas	48113019018	3	0.749082
Dallas	48113019019	3	0.699089
Dallas	48113019020	3	0.719903
Dallas	48113019021	3	0.763774
Dallas	48113019023	3	0.530923
Dallas	48113019024	3	0.735174
Dallas	48113019025	3	0.698032
Dallas	48113019026	3	0.694536

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113019027	3	0.736987
Dallas	48113019028	3	0.788937
Dallas	48113019029	3	0.806574
Dallas	48113019031	3	0.572561
Dallas	48113019032	3	0.663695
Dallas	48113019033	3	0.711114
Dallas	48113019034	3	0.60076
Dallas	48113019035	3	0.677426
Dallas	48113019036	3	0.495201
Dallas	48113019037	3	0.70777
Dallas	48113019038	3	0.52604
Dallas	48113019039	3	0.57965
Dallas	48113019040	3	0.716759
Dallas	48113019041	3	0.616274
Dallas	48113019042	3	0.682289
Dallas	48113019043	3	0.417048
Dallas	48113019100	3	0.635553
Dallas	48113019202	3	0.631826
Dallas	48113019203	3	0.298964
Dallas	48113019204	3	0.624405
Dallas	48113019205	3	0.144044
Dallas	48113019206	3	0.563308
Dallas	48113019208	3	0.639822
Dallas	48113019210	3	0.10519
Dallas	48113019211	3	0.508034
Dallas	48113019212	3	0.351415
Dallas	48113019213	3	0.642551
Dallas	48113019301	3	0.09735
Dallas	48113019302	3	0.361502
Dallas	48113019400	3	0.194908
Dallas	48113019501	3	0.161687
Dallas	48113019502	3	0.121411
Dallas	48113019600	3	0.185362
Dallas	48113019700	3	0.154956
Dallas	48113019800	3	0.159672
Dallas	48113019900	3	0.320367
Dallas	48113020000	3	0.578948
Dallas	48113020100	3	0.62177
Dallas	48113020200	3	0.26697
Dallas	48113020300	3	0.235297

County	Census Tract	TDHCA Region	Diversity Index
Dallas	48113020400	3	0.62215
Dallas	48113020500	3	0.465588
Dallas	48113020600	3	0.253251
Dallas	48113020700	3	0.434892
Dallas	48113980000	3	-
Dallas	48113980100	3	-
Dawson	48115950401	12	0.58529
Dawson	48115950402	12	0.713906
Dawson	48115950500	12	0.562623
Dawson	48115950600	12	0.41355
Deaf Smith	48117950300	1	0.46519
Deaf Smith	48117950400	1	0.445546
Deaf Smith	48117950500	1	0.426532
Deaf Smith	48117950600	1	0.527938
Delta	48119950100	4	0.161936
Delta	48119950200	4	0.392147
Denton	48121020103	3	0.313217
Denton	48121020104	3	0.344392
Denton	48121020105	3	0.477717
Denton	48121020106	3	0.371781
Denton	48121020107	3	0.406283
Denton	48121020108	3	0.571322
Denton	48121020109	3	0.527572
Denton	48121020110	3	0.532783
Denton	48121020111	3	0.383039
Denton	48121020112	3	0.524446
Denton	48121020113	3	0.664091
Denton	48121020114	3	0.665449
Denton	48121020115	3	0.494326
Denton	48121020202	3	0.27536
Denton	48121020203	3	0.302077
Denton	48121020204	3	0.227681
Denton	48121020205	3	0.265234
Denton	48121020303	3	0.193742
Denton	48121020305	3	0.188664
Denton	48121020306	3	0.390396
Denton	48121020307	3	0.317509
Denton	48121020308	3	0.398615
Denton	48121020309	3	0.263075
Denton	48121020310	3	0.129221

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Denton	48121020401	3	0.421624
Denton	48121020402	3	0.349629
Denton	48121020403	3	0.363768
Denton	48121020503	3	0.570861
Denton	48121020504	3	0.595001
Denton	48121020505	3	0.245489
Denton	48121020506	3	0.351637
Denton	48121020601	3	0.673399
Denton	48121020602	3	0.539788
Denton	48121020700	3	0.508107
Denton	48121020800	3	0.66011
Denton	48121020900	3	0.702818
Denton	48121021000	3	0.58298
Denton	48121021100	3	0.573756
Denton	48121021201	3	0.649806
Denton	48121021202	3	0.693667
Denton	48121021301	3	0.519914
Denton	48121021303	3	0.385288
Denton	48121021304	3	0.378883
Denton	48121021305	3	0.405606
Denton	48121021403	3	0.415878
Denton	48121021404	3	0.312412
Denton	48121021405	3	0.541847
Denton	48121021406	3	0.507458
Denton	48121021407	3	0.511938
Denton	48121021408	3	0.400106
Denton	48121021409	3	0.330472
Denton	48121021502	3	0.583665
Denton	48121021505	3	0.549629
Denton	48121021512	3	0.262017
Denton	48121021513	3	0.180709
Denton	48121021514	3	0.157461
Denton	48121021515	3	0.594995
Denton	48121021516	3	0.470375
Denton	48121021517	3	0.671777
Denton	48121021518	3	0.292775
Denton	48121021519	3	0.552677
Denton	48121021520	3	0.500573
Denton	48121021521	3	0.558008
Denton	48121021522	3	0.636096

County	Census Tract	TDHCA Region	Diversity Index
Denton	48121021523	3	0.481023
Denton	48121021524	3	0.377169
Denton	48121021525	3	0.50475
Denton	48121021526	3	0.362929
Denton	48121021527	3	0.347068
Denton	48121021611	3	0.618627
Denton	48121021612	3	0.577208
Denton	48121021613	3	0.729068
Denton	48121021614	3	0.629818
Denton	48121021615	3	0.627984
Denton	48121021616	3	0.720535
Denton	48121021618	3	0.676052
Denton	48121021619	3	0.591066
Denton	48121021620	3	0.75374
Denton	48121021621	3	0.494014
Denton	48121021622	3	0.565675
Denton	48121021623	3	0.593442
Denton	48121021624	3	0.708785
Denton	48121021625	3	0.570846
Denton	48121021626	3	0.276396
Denton	48121021627	3	0.357881
Denton	48121021628	3	0.534618
Denton	48121021629	3	0.551342
Denton	48121021630	3	0.649284
Denton	48121021631	3	0.641204
Denton	48121021632	3	0.420708
Denton	48121021633	3	0.479143
Denton	48121021634	3	0.648314
Denton	48121021635	3	0.684124
Denton	48121021636	3	0.646056
Denton	48121021637	3	0.728328
Denton	48121021638	3	0.716846
Denton	48121021715	3	0.525164
Denton	48121021716	3	0.558817
Denton	48121021717	3	0.430269
Denton	48121021718	3	0.245423
Denton	48121021719	3	0.268286
Denton	48121021720	3	0.532486
Denton	48121021721	3	0.29683
Denton	48121021722	3	0.423095

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Denton	48121021723	3	0.765327
Denton	48121021724	3	0.34831
Denton	48121021725	3	0.356118
Denton	48121021726	3	0.287707
Denton	48121021727	3	0.43046
Denton	48121021728	3	0.627531
Denton	48121021729	3	0.508866
Denton	48121021730	3	0.464081
Denton	48121021731	3	0.575378
Denton	48121021732	3	0.796688
Denton	48121021733	3	0.660065
Denton	48121021734	3	0.752636
Denton	48121021735	3	0.63674
Denton	48121021736	3	0.693772
Denton	48121021737	3	0.693925
Denton	48121021738	3	0.635142
Denton	48121021739	3	0.727062
Denton	48121021740	3	0.54031
Denton	48121021741	3	0.646975
Denton	48121021742	3	0.63177
Denton	48121021743	3	0.70357
Denton	48121021744	3	0.571467
Denton	48121021745	3	0.714878
Denton	48121021746	3	0.299521
Denton	48121021747	3	0.243719
Denton	48121021748	3	0.301592
Denton	48121021749	3	0.20206
Denton	48121021750	3	0.356939
Denton	48121021751	3	0.435027
Denton	48121021752	3	0.424066
Denton	48121021753	3	0.321609
Denton	48121021800	3	0.332883
Denton	48121021900	3	0.339069
DeWitt	48123970100	10	0.520047
DeWitt	48123970200	10	0.693534
DeWitt	48123970300	10	0.486612
DeWitt	48123970400	10	0.308453
DeWitt	48123970500	10	0.538197
Dickens	48125950300	1	0.423043
Dimmit	48127950200	11	0.274919

County	Census Tract	TDHCA Region	Diversity Index
Dimmit	48127950400	11	0.305246
Donley	48129950200	1	0.297182
Donley	48129950300	1	0.216078
Duval	48131950100	10	0.359667
Duval	48131950200	10	0.433749
Duval	48131950500	10	0.205635
Eastland	48133950100	2	0.432505
Eastland	48133950200	2	0.191423
Eastland	48133950300	2	0.250029
Eastland	48133950400	2	0.130989
Eastland	48133950500	2	0.33394
Ector	48135000100	12	0.469928
Ector	48135000300	12	0.460696
Ector	48135000400	12	0.466638
Ector	48135000500	12	0.609921
Ector	48135000600	12	0.582592
Ector	48135000700	12	0.602468
Ector	48135000800	12	0.497766
Ector	48135001000	12	0.503376
Ector	48135001100	12	0.401711
Ector	48135001300	12	0.547683
Ector	48135001500	12	0.413865
Ector	48135001600	12	0.54866
Ector	48135001700	12	0.558965
Ector	48135001800	12	0.661092
Ector	48135001900	12	0.408278
Ector	48135002000	12	0.355955
Ector	48135002200	12	0.447294
Ector	48135002300	12	0.488295
Ector	48135002400	12	0.442216
Ector	48135002501	12	0.497709
Ector	48135002502	12	0.498702
Ector	48135002503	12	0.622664
Ector	48135002700	12	0.485904
Ector	48135002801	12	0.423935
Ector	48135002802	12	0.467752
Ector	48135002900	12	0.40621
Ector	48135003000	12	0.584184
Ector	48135003100	12	0.515337
Edwards	48137950300	11	0.417296



Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Ellis	48139060101	3	0.59861
Ellis	48139060102	3	0.552097
Ellis	48139060204	3	0.54207
Ellis	48139060206	3	0.621192
Ellis	48139060207	3	0.460377
Ellis	48139060208	3	0.461344
Ellis	48139060209	3	0.368642
Ellis	48139060210	3	0.350636
Ellis	48139060211	3	0.214961
Ellis	48139060212	3	0.401799
Ellis	48139060213	3	0.385245
Ellis	48139060214	3	0.256801
Ellis	48139060300	3	0.541611
Ellis	48139060400	3	0.622532
Ellis	48139060500	3	0.534236
Ellis	48139060600	3	0.498516
Ellis	48139060701	3	0.549123
Ellis	48139060702	3	0.411573
Ellis	48139060703	3	0.438451
Ellis	48139060801	3	0.143636
Ellis	48139060802	3	0.230752
Ellis	48139060803	3	0.472484
Ellis	48139060900	3	0.288054
Ellis	48139061000	3	0.450272
Ellis	48139061100	3	0.51709
Ellis	48139061200	3	0.604566
Ellis	48139061300	3	0.402267
Ellis	48139061400	3	0.423038
Ellis	48139061500	3	0.731916
Ellis	48139061600	3	0.666661
Ellis	48139061700	3	0.361612
El Paso	48141000101	13	0.489753
El Paso	48141000106	13	0.668772
El Paso	48141000107	13	0.485961
El Paso	48141000108	13	0.566687
El Paso	48141000109	13	0.381873
El Paso	48141000110	13	0.459534
El Paso	48141000111	13	0.687368
El Paso	48141000112	13	0.404783
El Paso	48141000204	13	0.485497

County	Census Tract	TDHCA Region	Diversity Index
El Paso	48141000205	13	0.438122
El Paso	48141000206	13	0.394896
El Paso	48141000207	13	0.461648
El Paso	48141000208	13	0.379916
El Paso	48141000301	13	0.346197
El Paso	48141000302	13	0.285852
El Paso	48141000401	13	0.614448
El Paso	48141000403	13	0.36777
El Paso	48141000404	13	0.279526
El Paso	48141000600	13	0.343674
El Paso	48141000800	13	0.165416
El Paso	48141000900	13	0.406437
El Paso	48141001001	13	0.242611
El Paso	48141001002	13	0.235964
El Paso	48141001104	13	0.603644
El Paso	48141001107	13	0.605665
El Paso	48141001109	13	0.55055
El Paso	48141001110	13	0.591954
El Paso	48141001111	13	0.643328
El Paso	48141001112	13	0.450685
El Paso	48141001113	13	0.573043
El Paso	48141001114	13	0.552013
El Paso	48141001115	13	0.494235
El Paso	48141001201	13	0.476359
El Paso	48141001202	13	0.513676
El Paso	48141001203	13	0.377539
El Paso	48141001301	13	0.6063
El Paso	48141001302	13	0.515491
El Paso	48141001400	13	0.577533
El Paso	48141001501	13	0.514132
El Paso	48141001502	13	0.653086
El Paso	48141001600	13	0.560004
El Paso	48141001700	13	0.596855
El Paso	48141001800	13	0.31661
El Paso	48141001900	13	0.218162
El Paso	48141002000	13	0.216773
El Paso	48141002100	13	0.412971
El Paso	48141002201	13	0.489391
El Paso	48141002202	13	0.383881
El Paso	48141002300	13	0.27085

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
El Paso	48141002400	13	0.275658
El Paso	48141002500	13	0.289253
El Paso	48141002600	13	0.164514
El Paso	48141002800	13	0.302208
El Paso	48141002900	13	0.216862
El Paso	48141003000	13	0.116756
El Paso	48141003100	13	0.166967
El Paso	48141003200	13	0.199288
El Paso	48141003300	13	0.232326
El Paso	48141003402	13	0.365502
El Paso	48141003403	13	0.404038
El Paso	48141003404	13	0.439327
El Paso	48141003501	13	0.195207
El Paso	48141003502	13	0.266189
El Paso	48141003601	13	0.199897
El Paso	48141003602	13	0.187273
El Paso	48141003701	13	0.176936
El Paso	48141003702	13	0.171725
El Paso	48141003801	13	0.167179
El Paso	48141003803	13	0.26894
El Paso	48141003804	13	0.137115
El Paso	48141003901	13	0.231074
El Paso	48141003902	13	0.301382
El Paso	48141003903	13	0.195144
El Paso	48141004002	13	0.247734
El Paso	48141004003	13	0.145935
El Paso	48141004004	13	0.21187
El Paso	48141004103	13	0.164261
El Paso	48141004104	13	0.270616
El Paso	48141004105	13	0.088278
El Paso	48141004106	13	0.216674
El Paso	48141004107	13	0.251705
El Paso	48141004201	13	0.188484
El Paso	48141004202	13	0.251762
El Paso	48141004303	13	0.464679
El Paso	48141004307	13	0.481405
El Paso	48141004309	13	0.402837
El Paso	48141004310	13	0.273659
El Paso	48141004311	13	0.414579
El Paso	48141004312	13	0.352338

County	Census Tract	TDHCA Region	Diversity Index
El Paso	48141004313	13	0.405917
El Paso	48141004314	13	0.340873
El Paso	48141004316	13	0.266687
El Paso	48141004317	13	0.607178
El Paso	48141004318	13	0.409251
El Paso	48141004319	13	0.327217
El Paso	48141004320	13	0.273906
El Paso	48141010101	13	0.71343
El Paso	48141010102	13	0.694844
El Paso	48141010103	13	0.627139
El Paso	48141010203	13	0.532517
El Paso	48141010207	13	0.542199
El Paso	48141010210	13	0.681484
El Paso	48141010211	13	0.669141
El Paso	48141010212	13	0.608677
El Paso	48141010213	13	0.614441
El Paso	48141010214	13	0.572853
El Paso	48141010215	13	0.601496
El Paso	48141010216	13	0.476803
El Paso	48141010217	13	0.531259
El Paso	48141010218	13	0.627415
El Paso	48141010219	13	0.526516
El Paso	48141010220	13	0.467385
El Paso	48141010221	13	0.482901
El Paso	48141010222	13	0.467754
El Paso	48141010303	13	0.481004
El Paso	48141010307	13	0.325791
El Paso	48141010311	13	0.384537
El Paso	48141010312	13	0.47247
El Paso	48141010316	13	0.252589
El Paso	48141010317	13	0.409438
El Paso	48141010319	13	0.36106
El Paso	48141010322	13	0.295436
El Paso	48141010323	13	0.250387
El Paso	48141010324	13	0.355305
El Paso	48141010325	13	0.211995
El Paso	48141010326	13	0.305389
El Paso	48141010327	13	0.278521
El Paso	48141010328	13	0.312932
El Paso	48141010329	13	0.260956

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
El Paso	48141010330	13	0.397764
El Paso	48141010331	13	0.382695
El Paso	48141010332	13	0.178231
El Paso	48141010333	13	0.156598
El Paso	48141010334	13	0.166306
El Paso	48141010335	13	0.095662
El Paso	48141010336	13	0.247024
El Paso	48141010337	13	0.30714
El Paso	48141010338	13	0.273181
El Paso	48141010339	13	0.482113
El Paso	48141010340	13	0.174033
El Paso	48141010341	13	0.403919
El Paso	48141010342	13	0.462938
El Paso	48141010343	13	0.427954
El Paso	48141010344	13	0.196284
El Paso	48141010345	13	0.264566
El Paso	48141010346	13	0.151467
El Paso	48141010347	13	0.356485
El Paso	48141010401	13	0.13099
El Paso	48141010404	13	0.412908
El Paso	48141010405	13	0.313778
El Paso	48141010406	13	0.402352
El Paso	48141010407	13	0.39173
El Paso	48141010408	13	0.275193
El Paso	48141010409	13	0.149424
El Paso	48141010501	13	0.420652
El Paso	48141010502	13	0.367654
El Paso	48141010504	13	0.362227
El Paso	48141010505	13	0.213309
El Paso	48141010506	13	0.184088
El Paso	48141010600	13	0.683303
El Paso	48141980000	13	-
Erath	48143950100	3	0.066808
Erath	48143950201	3	0.37659
Erath	48143950202	3	0.264923
Erath	48143950300	3	0.483291
Erath	48143950400	3	0.319768
Erath	48143950500	3	0.312946
Erath	48143950600	3	0.317895
Erath	48143950700	3	0.355149

County	Census Tract	TDHCA Region	Diversity Index
Falls	48145000200	8	0.45147
Falls	48145000300	8	0.627234
Falls	48145000400	8	0.506536
Falls	48145000500	8	0.373387
Falls	48145000700	8	0.460019
Falls	48145000800	8	0.51114
Fannin	48147950100	3	0.356142
Fannin	48147950300	3	0.142005
Fannin	48147950401	3	0.561296
Fannin	48147950402	3	0.301433
Fannin	48147950500	3	0.263202
Fannin	48147950600	3	0.222581
Fannin	48147950701	3	0.158654
Fannin	48147950702	3	0.289184
Fannin	48147950800	3	0.207976
Fayette	48149970100	7	0.195197
Fayette	48149970200	7	0.262915
Fayette	48149970300	7	0.496838
Fayette	48149970400	7	0.244991
Fayette	48149970500	7	0.455286
Fayette	48149970600	7	0.370749
Fayette	48149970700	7	0.202532
Fisher	48151950300	2	0.378288
Fisher	48151950400	2	0.49942
Floyd	48153950500	1	0.458329
Floyd	48153950600	1	0.482815
Foard	48155950100	2	0.269303
Fort Bend	48157670101	6	0.619515
Fort Bend	48157670102	6	0.502164
Fort Bend	48157670200	6	0.541215
Fort Bend	48157670300	6	0.472606
Fort Bend	48157670400	6	0.338658
Fort Bend	48157670500	6	0.47966
Fort Bend	48157670601	6	0.335149
Fort Bend	48157670602	6	0.466621
Fort Bend	48157670700	6	0.639769
Fort Bend	48157670800	6	0.568059
Fort Bend	48157670901	6	0.668194
Fort Bend	48157670902	6	0.498087
Fort Bend	48157671001	6	0.579337

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Fort Bend	48157671002	6	0.676111
Fort Bend	48157671100	6	0.725301
Fort Bend	48157671200	6	0.557502
Fort Bend	48157671300	6	0.718601
Fort Bend	48157671400	6	0.751978
Fort Bend	48157671501	6	0.69609
Fort Bend	48157671502	6	0.685152
Fort Bend	48157671601	6	0.58869
Fort Bend	48157671602	6	0.495495
Fort Bend	48157671700	6	0.461703
Fort Bend	48157671800	6	0.761786
Fort Bend	48157671900	6	0.64527
Fort Bend	48157672001	6	0.651625
Fort Bend	48157672002	6	0.722857
Fort Bend	48157672100	6	0.497658
Fort Bend	48157672200	6	0.487443
Fort Bend	48157672301	6	0.664928
Fort Bend	48157672302	6	0.60726
Fort Bend	48157672400	6	0.740617
Fort Bend	48157672500	6	0.766616
Fort Bend	48157672601	6	0.726849
Fort Bend	48157672602	6	0.678856
Fort Bend	48157672701	6	0.760136
Fort Bend	48157672702	6	0.734603
Fort Bend	48157672800	6	0.705421
Fort Bend	48157672900	6	0.753827
Fort Bend	48157673001	6	0.434242
Fort Bend	48157673002	6	0.658458
Fort Bend	48157673003	6	0.56975
Fort Bend	48157673101	6	0.662648
Fort Bend	48157673102	6	0.582103
Fort Bend	48157673200	6	0.436117
Fort Bend	48157673300	6	0.327907
Fort Bend	48157673400	6	0.476519
Fort Bend	48157673500	6	0.412433
Fort Bend	48157673600	6	0.274289
Fort Bend	48157673700	6	0.62511
Fort Bend	48157673800	6	0.63258
Fort Bend	48157673901	6	0.562701
Fort Bend	48157673902	6	0.406614

County	Census Tract	TDHCA Region	Diversity Index
Fort Bend	48157674000	6	0.546829
Fort Bend	48157674100	6	0.547959
Fort Bend	48157674200	6	0.499478
Fort Bend	48157674300	6	0.641857
Fort Bend	48157674400	6	0.507887
Fort Bend	48157674501	6	0.678314
Fort Bend	48157674502	6	0.637979
Fort Bend	48157674601	6	0.427354
Fort Bend	48157674602	6	0.491978
Fort Bend	48157674603	6	0.528847
Fort Bend	48157674604	6	0.695836
Fort Bend	48157674700	6	0.738238
Fort Bend	48157674800	6	0.596531
Fort Bend	48157674900	6	0.451023
Fort Bend	48157675000	6	0.489181
Fort Bend	48157675100	6	0.652105
Fort Bend	48157675200	6	0.437795
Fort Bend	48157675300	6	0.635847
Fort Bend	48157675400	6	0.572345
Fort Bend	48157675500	6	0.694111
Fort Bend	48157675600	6	0.425782
Fort Bend	48157675700	6	0.471307
Fort Bend	48157675800	6	0.670493
Franklin	48159950100	4	0.129384
Franklin	48159950200	4	0.457321
Franklin	48159950300	4	0.369448
Freestone	48161000100	8	0.38884
Freestone	48161000200	8	0.37668
Freestone	48161000300	8	0.610773
Freestone	48161000400	8	0.356753
Freestone	48161000600	8	0.368658
Freestone	48161000700	8	0.473904
Freestone	48161000900	8	0.537988
Frio	48163950100	9	0.53139
Frio	48163950200	9	0.486737
Frio	48163950300	9	0.604718
Gaines	48165950100	12	0.404165
Gaines	48165950200	12	0.301478
Gaines	48165950300	12	0.534136
Galveston	48167720100	6	0.325473

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Galveston	48167720200	6	0.316237
Galveston	48167720301	6	0.320269
Galveston	48167720302	6	0.394772
Galveston	48167720400	6	0.28853
Galveston	48167720501	6	0.387249
Galveston	48167720502	6	0.434795
Galveston	48167720503	6	0.462493
Galveston	48167720600	6	0.548241
Galveston	48167720700	6	0.627228
Galveston	48167720800	6	0.637306
Galveston	48167720900	6	0.512069
Galveston	48167721000	6	0.425529
Galveston	48167721100	6	0.665057
Galveston	48167721201	6	0.474817
Galveston	48167721202	6	0.481026
Galveston	48167721300	6	0.40822
Galveston	48167721400	6	0.297307
Galveston	48167721500	6	0.255773
Galveston	48167721600	6	0.360633
Galveston	48167721700	6	0.582296
Galveston	48167721800	6	0.494276
Galveston	48167721900	6	0.642236
Galveston	48167722001	6	0.543173
Galveston	48167722002	6	0.609609
Galveston	48167722100	6	0.513727
Galveston	48167722200	6	0.636826
Galveston	48167722300	6	0.670516
Galveston	48167722600	6	0.580144
Galveston	48167722700	6	0.318506
Galveston	48167722800	6	0.678512
Galveston	48167722900	6	0.612659
Galveston	48167723000	6	0.552907
Galveston	48167723100	6	0.615243
Galveston	48167723200	6	0.626413
Galveston	48167723300	6	0.31872
Galveston	48167723400	6	0.183255
Galveston	48167723501	6	0.192907
Galveston	48167723502	6	0.252479
Galveston	48167723600	6	0.491869
Galveston	48167723700	6	0.611612

County	Census Tract	TDHCA Region	Diversity Index
Galveston	48167723800	6	0.308842
Galveston	48167723900	6	0.218632
Galveston	48167724000	6	0.604721
Galveston	48167724101	6	0.57078
Galveston	48167724200	6	0.579342
Galveston	48167724300	6	0.615883
Galveston	48167724400	6	0.59556
Galveston	48167724500	6	0.581722
Galveston	48167724600	6	0.449207
Galveston	48167724700	6	0.596349
Galveston	48167724800	6	0.532878
Galveston	48167724900	6	0.540891
Galveston	48167725000	6	0.622952
Galveston	48167725100	6	0.610249
Galveston	48167725200	6	0.575881
Galveston	48167725300	6	0.624371
Galveston	48167725400	6	0.546704
Galveston	48167725500	6	0.292632
Galveston	48167725600	6	0.603482
Galveston	48167725700	6	0.439845
Galveston	48167725800	6	0.601567
Galveston	48167725900	6	0.374496
Galveston	48167726000	6	0.36425
Galveston	48167726100	6	0.174773
Galveston	48167726200	6	0.6268
Galveston	48167990000	6	-
Garza	48169950100	1	0.555545
Gillespie	48171950100	9	0.290668
Gillespie	48171950200	9	0.203015
Gillespie	48171950300	9	0.310945
Gillespie	48171950400	9	0.389837
Gillespie	48171950500	9	0.332795
Glasscock	48173950100	12	0.449027
Goliad	48175960100	10	0.490405
Goliad	48175960200	10	0.557973
Gonzales	48177000100	10	0.556151
Gonzales	48177000200	10	0.586767
Gonzales	48177000300	10	0.651558
Gonzales	48177000400	10	0.642719
Gonzales	48177000500	10	0.618671

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County	Census Tract	TDHCA Region	Diversity Index
Gonzales	48177000600	10	0.47308
Gray	48179950100	1	0.408984
Gray	48179950300	1	0.297759
Gray	48179950400	1	0.354459
Gray	48179950500	1	0.491707
Gray	48179950600	1	0.623194
Gray	48179950700	1	0.521143
Gray	48179950800	1	0.658747
Grayson	48181000101	3	0.244703
Grayson	48181000102	3	0.238296
Grayson	48181000200	3	0.344803
Grayson	48181000302	3	0.229591
Grayson	48181000303	3	0.120111
Grayson	48181000304	3	0.09547
Grayson	48181000400	3	0.353903
Grayson	48181000501	3	0.382353
Grayson	48181000502	3	0.406177
Grayson	48181000600	3	0.208433
Grayson	48181000700	3	0.466023
Grayson	48181000800	3	0.21619
Grayson	48181000901	3	0.163673
Grayson	48181000902	3	0.403593
Grayson	48181001101	3	0.225413
Grayson	48181001102	3	0.184659
Grayson	48181001200	3	0.306074
Grayson	48181001300	3	0.4443
Grayson	48181001400	3	0.557825
Grayson	48181001500	3	0.621588
Grayson	48181001700	3	0.453591
Grayson	48181001801	3	0.355807
Grayson	48181001802	3	0.197127
Grayson	48181001803	3	0.186651
Grayson	48181001900	3	0.22861
Grayson	48181002000	3	0.69732
Gregg	48183000200	4	0.462447
Gregg	48183000300	4	0.33366
Gregg	48183000401	4	0.406805
Gregg	48183000402	4	0.427268
Gregg	48183000501	4	0.262387
Gregg	48183000502	4	0.477174

County	Census Tract	TDHCA Region	Diversity Index
Gregg	48183000600	4	0.264164
Gregg	48183000700	4	0.473404
Gregg	48183000800	4	0.676735
Gregg	48183000900	4	0.590892
Gregg	48183001000	4	0.586067
Gregg	48183001100	4	0.578499
Gregg	48183001200	4	0.549536
Gregg	48183001300	4	0.593244
Gregg	48183001400	4	0.586491
Gregg	48183001500	4	0.559763
Gregg	48183010100	4	0.404317
Gregg	48183010200	4	0.402905
Gregg	48183010301	4	0.4041
Gregg	48183010302	4	0.360306
Gregg	48183010400	4	0.375875
Gregg	48183010500	4	0.498949
Gregg	48183010600	4	0.341185
Gregg	48183010700	4	0.626689
Gregg	48183980000	4	-
Grimes	48185180101	8	0.656021
Grimes	48185180102	8	0.349783
Grimes	48185180200	8	0.551936
Grimes	48185180301	8	0.354085
Grimes	48185180302	8	0.304276
Grimes	48185180400	8	0.694093
Guadalupe	48187210100	9	0.651022
Guadalupe	48187210200	9	0.587593
Guadalupe	48187210300	9	0.720159
Guadalupe	48187210400	9	0.603586
Guadalupe	48187210504	9	0.575685
Guadalupe	48187210505	9	0.425674
Guadalupe	48187210506	9	0.532121
Guadalupe	48187210507	9	0.467564
Guadalupe	48187210508	9	0.580873
Guadalupe	48187210603	9	0.499223
Guadalupe	48187210604	9	0.599885
Guadalupe	48187210606	9	0.447656
Guadalupe	48187210607	9	0.430189
Guadalupe	48187210608	9	0.501189
Guadalupe	48187210705	9	0.639721

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Guadalupe	48187210706	9	0.656004
Guadalupe	48187210707	9	0.647858
Guadalupe	48187210708	9	0.587123
Guadalupe	48187210709	9	0.551718
Guadalupe	48187210710	9	0.550153
Guadalupe	48187210711	9	0.668158
Guadalupe	48187210712	9	0.529969
Guadalupe	48187210713	9	0.683623
Guadalupe	48187210714	9	0.665335
Guadalupe	48187210801	9	0.393221
Guadalupe	48187210803	9	0.431126
Guadalupe	48187210804	9	0.320892
Guadalupe	48187210901	9	0.38986
Guadalupe	48187210902	9	0.457204
Hale	48189950100	1	0.52059
Hale	48189950200	1	0.530433
Hale	48189950300	1	0.517247
Hale	48189950400	1	0.561332
Hale	48189950500	1	0.444518
Hale	48189950600	1	0.600959
Hale	48189950700	1	0.433912
Hale	48189950800	1	0.444289
Hale	48189950900	1	0.503343
Hall	48191950500	1	0.538937
Hamilton	48193950100	8	0.246477
Hamilton	48193950200	8	0.143696
Hamilton	48193950300	8	0.211391
Hansford	48195950100	1	0.465194
Hansford	48195950300	1	0.483062
Hardeman	48197950100	2	0.455212
Hardin	48199030100	5	0.051733
Hardin	48199030200	5	0.118517
Hardin	48199030300	5	0.197425
Hardin	48199030400	5	0.385691
Hardin	48199030501	5	0.110413
Hardin	48199030502	5	0.083872
Hardin	48199030600	5	0.117788
Hardin	48199030700	5	0.420527
Hardin	48199030800	5	0.446164
Hardin	48199030900	5	0.082606

County	Census Tract	TDHCA Region	Diversity Index
Hardin	48199031000	5	0.060442
Harris	48201100000	6	0.608617
Harris	48201210100	6	0.611683
Harris	48201210400	6	0.470903
Harris	48201210500	6	0.447403
Harris	48201210600	6	0.398986
Harris	48201210700	6	0.402477
Harris	48201210800	6	0.543584
Harris	48201210900	6	0.316228
Harris	48201211000	6	0.524844
Harris	48201211100	6	0.476473
Harris	48201211200	6	0.373849
Harris	48201211300	6	0.549895
Harris	48201211400	6	0.543871
Harris	48201211500	6	0.273513
Harris	48201211600	6	0.451815
Harris	48201211700	6	0.461325
Harris	48201211900	6	0.191142
Harris	48201212300	6	0.283865
Harris	48201212400	6	0.277764
Harris	48201212500	6	0.41423
Harris	48201220100	6	0.497034
Harris	48201220200	6	0.278226
Harris	48201220300	6	0.277724
Harris	48201220400	6	0.241677
Harris	48201220500	6	0.519951
Harris	48201220600	6	0.399459
Harris	48201220700	6	0.428547
Harris	48201220800	6	0.484676
Harris	48201220900	6	0.315012
Harris	48201221000	6	0.368583
Harris	48201221100	6	0.422683
Harris	48201221200	6	0.254856
Harris	48201221300	6	0.232754
Harris	48201221400	6	0.256428
Harris	48201221500	6	0.353016
Harris	48201221600	6	0.231781
Harris	48201221700	6	0.175612
Harris	48201221800	6	0.207526
Harris	48201221900	6	0.269756

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201222000	6	0.452444
Harris	48201222100	6	0.396148
Harris	48201222200	6	0.381675
Harris	48201222300	6	0.227129
Harris	48201222401	6	0.236348
Harris	48201222402	6	0.285649
Harris	48201222501	6	0.156207
Harris	48201222502	6	0.331149
Harris	48201222503	6	0.18101
Harris	48201222600	6	0.352398
Harris	48201222700	6	0.446734
Harris	48201222800	6	0.301166
Harris	48201222900	6	0.245295
Harris	48201223001	6	0.290429
Harris	48201223002	6	0.188506
Harris	48201223100	6	0.665441
Harris	48201230100	6	0.293084
Harris	48201230200	6	0.273255
Harris	48201230300	6	0.482169
Harris	48201230400	6	0.593156
Harris	48201230500	6	0.42548
Harris	48201230600	6	0.419057
Harris	48201230700	6	0.408344
Harris	48201230800	6	0.415057
Harris	48201230900	6	0.323653
Harris	48201231000	6	0.489325
Harris	48201231100	6	0.556244
Harris	48201231200	6	0.393466
Harris	48201231300	6	0.263285
Harris	48201231400	6	0.164649
Harris	48201231500	6	0.155721
Harris	48201231600	6	0.278806
Harris	48201231700	6	0.364592
Harris	48201231800	6	0.549736
Harris	48201231900	6	0.196944
Harris	48201232000	6	0.565754
Harris	48201232100	6	0.513745
Harris	48201232200	6	0.730202
Harris	48201232301	6	0.581217
Harris	48201232302	6	0.596994

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201232401	6	0.694241
Harris	48201232402	6	0.631602
Harris	48201232403	6	0.588292
Harris	48201232500	6	0.575603
Harris	48201232600	6	0.51629
Harris	48201232701	6	0.478126
Harris	48201232702	6	0.580969
Harris	48201232800	6	0.585627
Harris	48201232900	6	0.670418
Harris	48201233001	6	0.595728
Harris	48201233002	6	0.642083
Harris	48201233003	6	0.665618
Harris	48201233101	6	0.573853
Harris	48201233102	6	0.418245
Harris	48201233103	6	0.348068
Harris	48201233200	6	0.563365
Harris	48201233300	6	0.373193
Harris	48201233400	6	0.457479
Harris	48201233500	6	0.285623
Harris	48201233600	6	0.485991
Harris	48201233701	6	0.468143
Harris	48201233702	6	0.404684
Harris	48201233703	6	0.402267
Harris	48201240100	6	0.617413
Harris	48201240400	6	0.669987
Harris	48201240501	6	0.521923
Harris	48201240502	6	0.522476
Harris	48201240600	6	0.495816
Harris	48201240701	6	0.654931
Harris	48201240702	6	0.696586
Harris	48201240801	6	0.737739
Harris	48201240802	6	0.730729
Harris	48201240901	6	0.696505
Harris	48201240902	6	0.743477
Harris	48201241000	6	0.68038
Harris	48201241101	6	0.715364
Harris	48201241102	6	0.6925
Harris	48201241103	6	0.689628
Harris	48201241200	6	0.727511
Harris	48201241300	6	0.692573



Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201241400	6	0.577608
Harris	48201241500	6	0.711476
Harris	48201250100	6	0.696861
Harris	48201250200	6	0.66315
Harris	48201250301	6	0.658564
Harris	48201250302	6	0.701393
Harris	48201250401	6	0.641497
Harris	48201250402	6	0.553233
Harris	48201250500	6	0.592951
Harris	48201250600	6	0.744997
Harris	48201250701	6	0.532585
Harris	48201250702	6	0.498945
Harris	48201250800	6	0.388603
Harris	48201250900	6	0.210598
Harris	48201251000	6	0.543796
Harris	48201251100	6	0.307314
Harris	48201251200	6	0.408343
Harris	48201251300	6	0.244813
Harris	48201251401	6	0.307759
Harris	48201251402	6	0.28861
Harris	48201251501	6	0.404502
Harris	48201251502	6	0.279076
Harris	48201251503	6	0.230642
Harris	48201251600	6	0.220299
Harris	48201251700	6	0.283375
Harris	48201251800	6	0.365578
Harris	48201251901	6	0.400972
Harris	48201251902	6	0.409272
Harris	48201252000	6	0.673942
Harris	48201252100	6	0.594849
Harris	48201252200	6	0.627014
Harris	48201252301	6	0.588759
Harris	48201252302	6	0.604736
Harris	48201252400	6	0.425859
Harris	48201252500	6	0.589809
Harris	48201252600	6	0.524635
Harris	48201252700	6	0.510651
Harris	48201252800	6	0.61273
Harris	48201252900	6	0.457127
Harris	48201253000	6	0.65466

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201253100	6	0.661819
Harris	48201253200	6	0.555862
Harris	48201253300	6	0.580245
Harris	48201253400	6	0.579501
Harris	48201253500	6	0.692417
Harris	48201253600	6	0.714113
Harris	48201253700	6	0.59388
Harris	48201253800	6	0.605435
Harris	48201253900	6	0.669742
Harris	48201254000	6	0.71194
Harris	48201254100	6	0.713646
Harris	48201254200	6	0.642417
Harris	48201254300	6	0.666949
Harris	48201254400	6	0.599478
Harris	48201254500	6	0.612276
Harris	48201254600	6	0.676102
Harris	48201254700	6	0.573005
Harris	48201310100	6	0.731011
Harris	48201310200	6	0.710443
Harris	48201310300	6	0.598048
Harris	48201310400	6	0.274351
Harris	48201310500	6	0.202506
Harris	48201310600	6	0.32463
Harris	48201310700	6	0.405154
Harris	48201310800	6	0.212313
Harris	48201310900	6	0.236363
Harris	48201311000	6	0.159007
Harris	48201311100	6	0.313895
Harris	48201311200	6	0.274105
Harris	48201311300	6	0.412329
Harris	48201311400	6	0.503818
Harris	48201311500	6	0.36026
Harris	48201311600	6	0.489532
Harris	48201311700	6	0.36647
Harris	48201311800	6	0.323556
Harris	48201311900	6	0.323676
Harris	48201312000	6	0.685302
Harris	48201312100	6	0.671553
Harris	48201312200	6	0.271137
Harris	48201312300	6	0.468721

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201312400	6	0.380223
Harris	48201312500	6	0.614022
Harris	48201312600	6	0.636415
Harris	48201312700	6	0.284658
Harris	48201312800	6	0.247503
Harris	48201312900	6	0.330089
Harris	48201313000	6	0.290679
Harris	48201313100	6	0.587973
Harris	48201313200	6	0.324556
Harris	48201313300	6	0.289186
Harris	48201313400	6	0.38469
Harris	48201313500	6	0.282177
Harris	48201313600	6	0.439759
Harris	48201313700	6	0.219077
Harris	48201313800	6	0.250374
Harris	48201313900	6	0.729398
Harris	48201314001	6	0.697821
Harris	48201314002	6	0.632098
Harris	48201314300	6	0.312704
Harris	48201314400	6	0.543072
Harris	48201320100	6	0.55837
Harris	48201320200	6	0.520464
Harris	48201320500	6	0.479624
Harris	48201320601	6	0.452669
Harris	48201320602	6	0.4525
Harris	48201320700	6	0.668978
Harris	48201320800	6	0.47966
Harris	48201320900	6	0.393569
Harris	48201321000	6	0.55136
Harris	48201321100	6	0.605552
Harris	48201321200	6	0.437095
Harris	48201321300	6	0.384107
Harris	48201321401	6	0.473252
Harris	48201321402	6	0.547167
Harris	48201321500	6	0.488486
Harris	48201321600	6	0.377775
Harris	48201321700	6	0.398091
Harris	48201321800	6	0.397173
Harris	48201321900	6	0.379054
Harris	48201322000	6	0.326149

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201322100	6	0.279952
Harris	48201322200	6	0.37506
Harris	48201322600	6	0.440935
Harris	48201322700	6	0.462807
Harris	48201322800	6	0.389826
Harris	48201322900	6	0.341692
Harris	48201323000	6	0.430818
Harris	48201323100	6	0.539645
Harris	48201323200	6	0.521782
Harris	48201323300	6	0.398343
Harris	48201323400	6	0.483031
Harris	48201323500	6	0.470368
Harris	48201323600	6	0.556939
Harris	48201323701	6	0.535692
Harris	48201323702	6	0.496726
Harris	48201323801	6	0.515449
Harris	48201323802	6	0.489798
Harris	48201323900	6	0.524866
Harris	48201324000	6	0.516637
Harris	48201324100	6	0.448045
Harris	48201324200	6	0.355267
Harris	48201330100	6	0.550364
Harris	48201330200	6	0.556851
Harris	48201330301	6	0.565027
Harris	48201330302	6	0.620128
Harris	48201330303	6	0.611156
Harris	48201330400	6	0.505193
Harris	48201330500	6	0.471335
Harris	48201330600	6	0.552354
Harris	48201330700	6	0.63119
Harris	48201330800	6	0.549733
Harris	48201330900	6	0.609579
Harris	48201331100	6	0.226386
Harris	48201331200	6	0.142694
Harris	48201331300	6	0.216864
Harris	48201331400	6	0.117779
Harris	48201331500	6	0.282891
Harris	48201331601	6	0.159527
Harris	48201331602	6	0.382364
Harris	48201331700	6	0.288246

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201331800	6	0.294937
Harris	48201331900	6	0.216894
Harris	48201332000	6	0.414467
Harris	48201332100	6	0.552284
Harris	48201332200	6	0.551385
Harris	48201332300	6	0.298949
Harris	48201332400	6	0.296072
Harris	48201332500	6	0.501987
Harris	48201332600	6	0.577494
Harris	48201332700	6	0.441239
Harris	48201332800	6	0.455837
Harris	48201332900	6	0.300954
Harris	48201333000	6	0.438062
Harris	48201333100	6	0.670419
Harris	48201333201	6	0.656969
Harris	48201333202	6	0.633043
Harris	48201333300	6	0.547737
Harris	48201333500	6	0.51602
Harris	48201333600	6	0.664676
Harris	48201333700	6	0.519366
Harris	48201333800	6	0.654799
Harris	48201333901	6	0.716174
Harris	48201333902	6	0.664492
Harris	48201334001	6	0.723644
Harris	48201334002	6	0.720614
Harris	48201334003	6	0.703472
Harris	48201334100	6	0.583209
Harris	48201340100	6	0.754683
Harris	48201340201	6	0.587408
Harris	48201340202	6	0.588231
Harris	48201340203	6	0.408472
Harris	48201340301	6	0.506895
Harris	48201340302	6	0.384089
Harris	48201340400	6	0.347281
Harris	48201340500	6	0.593707
Harris	48201340600	6	0.255624
Harris	48201340700	6	0.752163
Harris	48201340800	6	0.478495
Harris	48201340900	6	0.730066
Harris	48201341000	6	0.683952

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201341100	6	0.636232
Harris	48201341201	6	0.574399
Harris	48201341202	6	0.383574
Harris	48201341301	6	0.688522
Harris	48201341302	6	0.699612
Harris	48201341400	6	0.345778
Harris	48201341501	6	0.264656
Harris	48201341502	6	0.380802
Harris	48201341600	6	0.330559
Harris	48201341700	6	0.353885
Harris	48201341800	6	0.402346
Harris	48201342001	6	0.419691
Harris	48201342002	6	0.505297
Harris	48201342100	6	0.486038
Harris	48201342200	6	0.583323
Harris	48201342300	6	0.609692
Harris	48201342400	6	0.612923
Harris	48201342500	6	0.292788
Harris	48201342700	6	0.289847
Harris	48201342800	6	0.461592
Harris	48201342900	6	0.361783
Harris	48201343000	6	0.554163
Harris	48201343100	6	0.475701
Harris	48201343200	6	0.54056
Harris	48201343301	6	0.529454
Harris	48201343302	6	0.425447
Harris	48201343600	6	0.549765
Harris	48201343700	6	0.646312
Harris	48201350100	6	0.752273
Harris	48201350200	6	0.645709
Harris	48201350300	6	0.650662
Harris	48201350400	6	0.78058
Harris	48201350500	6	0.762092
Harris	48201350601	6	0.548198
Harris	48201350602	6	0.599754
Harris	48201350700	6	0.489987
Harris	48201350801	6	0.505913
Harris	48201350802	6	0.624907
Harris	48201410100	6	0.685478
Harris	48201410200	6	0.367803

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201410300	6	0.387323
Harris	48201410401	6	0.241209
Harris	48201410402	6	0.459602
Harris	48201410500	6	0.369169
Harris	48201410600	6	0.382758
Harris	48201410701	6	0.437509
Harris	48201410702	6	0.520767
Harris	48201410800	6	0.316437
Harris	48201410900	6	0.461705
Harris	48201411000	6	0.324071
Harris	48201411100	6	0.443152
Harris	48201411200	6	0.24354
Harris	48201411300	6	0.485559
Harris	48201411400	6	0.138105
Harris	48201411501	6	0.405173
Harris	48201411502	6	0.412436
Harris	48201411600	6	0.31586
Harris	48201411700	6	0.608279
Harris	48201411800	6	0.568665
Harris	48201411900	6	0.27674
Harris	48201412000	6	0.254252
Harris	48201412100	6	0.722875
Harris	48201412200	6	0.408269
Harris	48201412300	6	0.231987
Harris	48201412400	6	0.283513
Harris	48201412500	6	0.390371
Harris	48201412600	6	0.249305
Harris	48201412700	6	0.412564
Harris	48201412800	6	0.428159
Harris	48201412900	6	0.633764
Harris	48201413000	6	0.472923
Harris	48201413100	6	0.341589
Harris	48201413201	6	0.560698
Harris	48201413202	6	0.585741
Harris	48201413300	6	0.578858
Harris	48201420100	6	0.719463
Harris	48201420200	6	0.746939
Harris	48201420300	6	0.473281
Harris	48201420400	6	0.438949
Harris	48201420500	6	0.580204

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201420600	6	0.545382
Harris	48201420700	6	0.340156
Harris	48201420800	6	0.350809
Harris	48201420900	6	0.412582
Harris	48201421000	6	0.462204
Harris	48201421101	6	0.642668
Harris	48201421102	6	0.457364
Harris	48201421201	6	0.500728
Harris	48201421202	6	0.286757
Harris	48201421300	6	0.672186
Harris	48201421401	6	0.412985
Harris	48201421402	6	0.302626
Harris	48201421403	6	0.367832
Harris	48201421500	6	0.64919
Harris	48201421600	6	0.440036
Harris	48201421700	6	0.717414
Harris	48201421800	6	0.692179
Harris	48201421900	6	0.296593
Harris	48201422000	6	0.459487
Harris	48201422100	6	0.716851
Harris	48201422200	6	0.522163
Harris	48201422301	6	0.579938
Harris	48201422302	6	0.604379
Harris	48201422401	6	0.703427
Harris	48201422402	6	0.649859
Harris	48201422500	6	0.693748
Harris	48201422600	6	0.609561
Harris	48201422701	6	0.394056
Harris	48201422702	6	0.537156
Harris	48201422800	6	0.616332
Harris	48201422900	6	0.551777
Harris	48201423000	6	0.538373
Harris	48201423100	6	0.400136
Harris	48201423201	6	0.73655
Harris	48201423202	6	0.686209
Harris	48201423301	6	0.689994
Harris	48201423302	6	0.52134
Harris	48201423401	6	0.575064
Harris	48201423402	6	0.56359
Harris	48201423500	6	0.748185

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201423600	6	0.640948
Harris	48201430100	6	0.359471
Harris	48201430200	6	0.365569
Harris	48201430300	6	0.26329
Harris	48201430400	6	0.353209
Harris	48201430500	6	0.434509
Harris	48201430600	6	0.344622
Harris	48201430700	6	0.445904
Harris	48201430800	6	0.473428
Harris	48201430900	6	0.38176
Harris	48201431000	6	0.406744
Harris	48201431101	6	0.617691
Harris	48201431102	6	0.620015
Harris	48201431201	6	0.679533
Harris	48201431202	6	0.605685
Harris	48201431301	6	0.733683
Harris	48201431302	6	0.275468
Harris	48201431401	6	0.552659
Harris	48201431402	6	0.586599
Harris	48201431501	6	0.374851
Harris	48201431502	6	0.35634
Harris	48201431600	6	0.208994
Harris	48201431700	6	0.177196
Harris	48201431801	6	0.523648
Harris	48201431802	6	0.600247
Harris	48201431900	6	0.558259
Harris	48201432001	6	0.656458
Harris	48201432002	6	0.630496
Harris	48201432100	6	0.741077
Harris	48201432200	6	0.709341
Harris	48201432300	6	0.699607
Harris	48201432400	6	0.725628
Harris	48201432500	6	0.707389
Harris	48201432600	6	0.639467
Harris	48201432701	6	0.450508
Harris	48201432702	6	0.621828
Harris	48201432801	6	0.72031
Harris	48201432802	6	0.65588
Harris	48201432901	6	0.626708
Harris	48201432902	6	0.718435

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201433001	6	0.653093
Harris	48201433002	6	0.620395
Harris	48201433003	6	0.634515
Harris	48201433100	6	0.568705
Harris	48201433201	6	0.753197
Harris	48201433202	6	0.762978
Harris	48201433300	6	0.697354
Harris	48201433400	6	0.731836
Harris	48201433501	6	0.538781
Harris	48201433502	6	0.660896
Harris	48201433600	6	0.660754
Harris	48201440100	6	0.733458
Harris	48201450100	6	0.359248
Harris	48201450200	6	0.242381
Harris	48201450300	6	0.699989
Harris	48201450400	6	0.679056
Harris	48201450500	6	0.270239
Harris	48201450600	6	0.497641
Harris	48201450700	6	0.214293
Harris	48201450801	6	0.505131
Harris	48201450802	6	0.664757
Harris	48201450900	6	0.497093
Harris	48201451001	6	0.648859
Harris	48201451002	6	0.621612
Harris	48201451100	6	0.649961
Harris	48201451200	6	0.242724
Harris	48201451300	6	0.632812
Harris	48201451401	6	0.626852
Harris	48201451402	6	0.720117
Harris	48201451403	6	0.712997
Harris	48201451500	6	0.670068
Harris	48201451601	6	0.62966
Harris	48201451602	6	0.667228
Harris	48201451700	6	0.713829
Harris	48201451800	6	0.759909
Harris	48201451901	6	0.605488
Harris	48201451902	6	0.573945
Harris	48201452000	6	0.698822
Harris	48201452100	6	0.720181
Harris	48201452201	6	0.64704

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201452202	6	0.674679
Harris	48201452300	6	0.76484
Harris	48201452400	6	0.7057
Harris	48201452500	6	0.737168
Harris	48201452600	6	0.64928
Harris	48201452700	6	0.727388
Harris	48201452801	6	0.758273
Harris	48201452802	6	0.737716
Harris	48201452900	6	0.724004
Harris	48201453000	6	0.666591
Harris	48201453100	6	0.751928
Harris	48201453200	6	0.739409
Harris	48201453300	6	0.673587
Harris	48201453401	6	0.765996
Harris	48201453402	6	0.769292
Harris	48201453403	6	0.680353
Harris	48201453501	6	0.77104
Harris	48201453502	6	0.658867
Harris	48201453601	6	0.756712
Harris	48201453602	6	0.731531
Harris	48201453700	6	0.727091
Harris	48201453800	6	0.7783
Harris	48201453900	6	0.664921
Harris	48201454000	6	0.737267
Harris	48201454100	6	0.734578
Harris	48201454200	6	0.608801
Harris	48201454301	6	0.685401
Harris	48201454302	6	0.679728
Harris	48201454400	6	0.549889
Harris	48201454501	6	0.431771
Harris	48201454502	6	0.529807
Harris	48201454600	6	0.59125
Harris	48201454700	6	0.42188
Harris	48201454800	6	0.506978
Harris	48201454900	6	0.585336
Harris	48201455000	6	0.552316
Harris	48201455101	6	0.510909
Harris	48201455102	6	0.389056
Harris	48201455200	6	0.472824
Harris	48201455300	6	0.641794

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201510100	6	0.720995
Harris	48201510200	6	0.568954
Harris	48201510300	6	0.323516
Harris	48201510400	6	0.276257
Harris	48201510500	6	0.441213
Harris	48201510600	6	0.524732
Harris	48201510700	6	0.512902
Harris	48201510800	6	0.463639
Harris	48201510900	6	0.607249
Harris	48201511001	6	0.48477
Harris	48201511002	6	0.542734
Harris	48201511100	6	0.639707
Harris	48201511200	6	0.565755
Harris	48201511301	6	0.319925
Harris	48201511302	6	0.249743
Harris	48201511400	6	0.442552
Harris	48201511500	6	0.47191
Harris	48201511600	6	0.420576
Harris	48201520100	6	0.65556
Harris	48201520200	6	0.603318
Harris	48201520300	6	0.68926
Harris	48201520400	6	0.631868
Harris	48201520500	6	0.60297
Harris	48201520601	6	0.594065
Harris	48201520602	6	0.558936
Harris	48201520700	6	0.681329
Harris	48201521000	6	0.722359
Harris	48201521100	6	0.493969
Harris	48201521200	6	0.646229
Harris	48201521300	6	0.66881
Harris	48201521400	6	0.453676
Harris	48201521500	6	0.690644
Harris	48201521600	6	0.655998
Harris	48201521700	6	0.749639
Harris	48201521800	6	0.758589
Harris	48201521900	6	0.553051
Harris	48201522000	6	0.682005
Harris	48201522100	6	0.727824
Harris	48201522201	6	0.677867
Harris	48201522202	6	0.669179

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201522301	6	0.677247
Harris	48201522302	6	0.732311
Harris	48201522401	6	0.566529
Harris	48201522402	6	0.548904
Harris	48201522500	6	0.252553
Harris	48201530100	6	0.617401
Harris	48201530200	6	0.514846
Harris	48201530300	6	0.509427
Harris	48201530400	6	0.483759
Harris	48201530500	6	0.53458
Harris	48201530600	6	0.636359
Harris	48201530700	6	0.491908
Harris	48201530800	6	0.441934
Harris	48201530900	6	0.561107
Harris	48201531000	6	0.436211
Harris	48201531100	6	0.349828
Harris	48201531200	6	0.564414
Harris	48201531300	6	0.646819
Harris	48201531400	6	0.53454
Harris	48201531500	6	0.594095
Harris	48201531600	6	0.560804
Harris	48201531700	6	0.379772
Harris	48201531800	6	0.454934
Harris	48201531900	6	0.422915
Harris	48201532001	6	0.667684
Harris	48201532002	6	0.525867
Harris	48201532100	6	0.710349
Harris	48201532200	6	0.68812
Harris	48201532300	6	0.699298
Harris	48201532400	6	0.646825
Harris	48201532501	6	0.694681
Harris	48201532502	6	0.613052
Harris	48201532600	6	0.69129
Harris	48201532700	6	0.684725
Harris	48201532800	6	0.704158
Harris	48201532900	6	0.681333
Harris	48201533000	6	0.443652
Harris	48201533100	6	0.457393
Harris	48201533200	6	0.457832
Harris	48201533300	6	0.222767

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201533400	6	0.536183
Harris	48201533500	6	0.637958
Harris	48201533600	6	0.614469
Harris	48201533701	6	0.418658
Harris	48201533702	6	0.503101
Harris	48201533801	6	0.588347
Harris	48201533802	6	0.50237
Harris	48201533901	6	0.619799
Harris	48201533902	6	0.576241
Harris	48201534001	6	0.612425
Harris	48201534002	6	0.508868
Harris	48201534003	6	0.699019
Harris	48201534100	6	0.728395
Harris	48201534201	6	0.703387
Harris	48201534202	6	0.631302
Harris	48201534203	6	0.718102
Harris	48201540100	6	0.677103
Harris	48201540200	6	0.642815
Harris	48201540501	6	0.714792
Harris	48201540502	6	0.505559
Harris	48201540601	6	0.716767
Harris	48201540602	6	0.749435
Harris	48201540700	6	0.711141
Harris	48201540800	6	0.716684
Harris	48201540901	6	0.461569
Harris	48201540902	6	0.692739
Harris	48201541001	6	0.73005
Harris	48201541002	6	0.723591
Harris	48201541003	6	0.726309
Harris	48201541100	6	0.555014
Harris	48201541201	6	0.553216
Harris	48201541202	6	0.624182
Harris	48201541203	6	0.295086
Harris	48201541300	6	0.725362
Harris	48201541400	6	0.783521
Harris	48201541500	6	0.719766
Harris	48201541601	6	0.59773
Harris	48201541602	6	0.687027
Harris	48201541700	6	0.720853
Harris	48201541800	6	0.737167

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County	Census Tract	TDHCA Region	Diversity Index
Harris	48201541900	6	0.652334
Harris	48201542000	6	0.69003
Harris	48201542101	6	0.705236
Harris	48201542102	6	0.729172
Harris	48201542200	6	0.693854
Harris	48201542301	6	0.714102
Harris	48201542302	6	0.692294
Harris	48201542400	6	0.677626
Harris	48201542500	6	0.236913
Harris	48201542600	6	0.622303
Harris	48201542700	6	0.49535
Harris	48201542800	6	0.417494
Harris	48201542900	6	0.746321
Harris	48201543001	6	0.692329
Harris	48201543002	6	0.633883
Harris	48201543003	6	0.733062
Harris	48201543100	6	0.644629
Harris	48201543200	6	0.665665
Harris	48201550100	6	0.616756
Harris	48201550200	6	0.457998
Harris	48201550301	6	0.534421
Harris	48201550302	6	0.60527
Harris	48201550401	6	0.660673
Harris	48201550402	6	0.460751
Harris	48201550500	6	0.646689
Harris	48201550601	6	0.668567
Harris	48201550602	6	0.586579
Harris	48201550603	6	0.6115
Harris	48201550700	6	0.703083
Harris	48201550800	6	0.586049
Harris	48201550900	6	0.722255
Harris	48201551000	6	0.509758
Harris	48201551100	6	0.714569
Harris	48201551200	6	0.763231
Harris	48201551300	6	0.721017
Harris	48201551400	6	0.744352
Harris	48201551500	6	0.749026
Harris	48201551600	6	0.664697
Harris	48201551701	6	0.694723
Harris	48201551702	6	0.589854

County	Census Tract	TDHCA Region	Diversity Index
Harris	48201551703	6	0.645106
Harris	48201551800	6	0.359303
Harris	48201551900	6	0.689199
Harris	48201552001	6	0.749492
Harris	48201552002	6	0.603956
Harris	48201552101	6	0.753677
Harris	48201552102	6	0.592089
Harris	48201552103	6	0.548384
Harris	48201552200	6	0.685063
Harris	48201552301	6	0.312388
Harris	48201552302	6	0.608664
Harris	48201552400	6	0.691673
Harris	48201552500	6	0.655156
Harris	48201552601	6	0.704114
Harris	48201552602	6	0.491035
Harris	48201552700	6	0.634183
Harris	48201552800	6	0.521715
Harris	48201552900	6	0.516866
Harris	48201553001	6	0.713079
Harris	48201553002	6	0.740781
Harris	48201553100	6	0.720786
Harris	48201553200	6	0.662749
Harris	48201553300	6	0.651061
Harris	48201553401	6	0.440264
Harris	48201553402	6	0.654184
Harris	48201553403	6	0.607084
Harris	48201553500	6	0.521431
Harris	48201553600	6	0.581336
Harris	48201553700	6	0.523651
Harris	48201553801	6	0.423118
Harris	48201553802	6	0.503005
Harris	48201553900	6	0.527719
Harris	48201554001	6	0.60103
Harris	48201554002	6	0.313561
Harris	48201554101	6	0.264036
Harris	48201554102	6	0.587945
Harris	48201554200	6	0.645552
Harris	48201554301	6	0.290518
Harris	48201554302	6	0.606315
Harris	48201554401	6	0.395374



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County	Census Tract	TDHCA Region	Diversity Index
Harris	48201554402	6	0.492052
Harris	48201554403	6	0.556401
Harris	48201554501	6	0.431707
Harris	48201554502	6	0.282539
Harris	48201554600	6	0.288272
Harris	48201554700	6	0.414843
Harris	48201554801	6	0.648046
Harris	48201554802	6	0.5029
Harris	48201554901	6	0.692155
Harris	48201554902	6	0.419645
Harris	48201554903	6	0.510868
Harris	48201555000	6	0.552689
Harris	48201555100	6	0.648167
Harris	48201555200	6	0.537385
Harris	48201555301	6	0.313836
Harris	48201555302	6	0.468504
Harris	48201555303	6	0.47317
Harris	48201555401	6	0.51862
Harris	48201555402	6	0.466696
Harris	48201555501	6	0.453794
Harris	48201555502	6	0.517914
Harris	48201555600	6	0.469412
Harris	48201555701	6	0.488694
Harris	48201555702	6	0.448336
Harris	48201556000	6	0.575947
Harris	48201980000	6	0
Harris	48201980100	6	0.648222
Harrison	48203020102	4	0.438396
Harrison	48203020103	4	0.420398
Harrison	48203020104	4	0.414589
Harrison	48203020200	4	0.231284
Harrison	48203020301	4	0.445484
Harrison	48203020302	4	0.593129
Harrison	48203020401	4	0.582388
Harrison	48203020402	4	0.482181
Harrison	48203020501	4	0.640149
Harrison	48203020502	4	0.42061
Harrison	48203020603	4	0.24028
Harrison	48203020604	4	0.459559
Harrison	48203020605	4	0.256526

County	Census Tract	TDHCA Region	Diversity Index
Harrison	48203020606	4	0.269185
Hartley	48205950200	1	0.484775
Haskell	48207950300	2	0.452771
Haskell	48207950400	2	0.32403
Hays	48209010100	7	0.437854
Hays	48209010200	7	0.603983
Hays	48209010302	7	0.456605
Hays	48209010303	7	0.555585
Hays	48209010304	7	0.578447
Hays	48209010400	7	0.577256
Hays	48209010500	7	0.563592
Hays	48209010600	7	0.532083
Hays	48209010701	7	0.384219
Hays	48209010702	7	0.332671
Hays	48209010803	7	0.26325
Hays	48209010804	7	0.161499
Hays	48209010805	7	0.304184
Hays	48209010806	7	0.165823
Hays	48209010807	7	0.331636
Hays	48209010808	7	0.177228
Hays	48209010809	7	0.26122
Hays	48209010901	7	0.333877
Hays	48209010902	7	0.520644
Hays	48209010905	7	0.479886
Hays	48209010906	7	0.582618
Hays	48209010907	7	0.539631
Hays	48209010908	7	0.536389
Hays	48209010909	7	0.490879
Hays	48209010910	7	0.560033
Hemphill	48211950300	1	0.469001
Henderson	48213950100	4	0.172347
Henderson	48213950200	4	0.252101
Henderson	48213950300	4	0.216658
Henderson	48213950400	4	0.318587
Henderson	48213950500	4	0.106685
Henderson	48213950601	4	0.204085
Henderson	48213950602	4	0.177776
Henderson	48213950700	4	0.225003
Henderson	48213950800	4	0.192894
Henderson	48213950901	4	0.131702

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County	Census Tract	TDHCA Region	Diversity Index
Henderson	48213950902	4	0.280176
Henderson	48213950903	4	0.194491
Henderson	48213951000	4	0.565037
Henderson	48213951100	4	0.10403
Henderson	48213951200	4	0.633719
Henderson	48213951300	4	0.429566
Henderson	48213951400	4	0.257219
Hidalgo	48215020101	11	0.185294
Hidalgo	48215020102	11	0.255616
Hidalgo	48215020201	11	0.11238
Hidalgo	48215020202	11	0.096235
Hidalgo	48215020204	11	0.157352
Hidalgo	48215020205	11	0.191202
Hidalgo	48215020301	11	0.339995
Hidalgo	48215020302	11	0.258683
Hidalgo	48215020402	11	0.462288
Hidalgo	48215020403	11	0.271687
Hidalgo	48215020404	11	0.455559
Hidalgo	48215020501	11	0.454663
Hidalgo	48215020503	11	0.272616
Hidalgo	48215020504	11	0.455841
Hidalgo	48215020600	11	0.329715
Hidalgo	48215020701	11	0.337151
Hidalgo	48215020721	11	0.33259
Hidalgo	48215020723	11	0.283783
Hidalgo	48215020724	11	0.424028
Hidalgo	48215020725	11	0.408461
Hidalgo	48215020726	11	0.294958
Hidalgo	48215020802	11	0.384445
Hidalgo	48215020803	11	0.426838
Hidalgo	48215020804	11	0.3714
Hidalgo	48215020901	11	0.535792
Hidalgo	48215020903	11	0.411969
Hidalgo	48215020904	11	0.573773
Hidalgo	48215021000	11	0.357146
Hidalgo	48215021100	11	0.434249
Hidalgo	48215021201	11	0.507914
Hidalgo	48215021202	11	0.413403
Hidalgo	48215021302	11	0.085046
Hidalgo	48215021303	11	0.219064

County	Census Tract	TDHCA Region	Diversity Index
Hidalgo	48215021304	11	0.250478
Hidalgo	48215021305	11	0.248276
Hidalgo	48215021401	11	0.12992
Hidalgo	48215021403	11	0.259005
Hidalgo	48215021404	11	0.308847
Hidalgo	48215021500	11	0.163483
Hidalgo	48215021600	11	0.124086
Hidalgo	48215021701	11	0.214715
Hidalgo	48215021702	11	0.171833
Hidalgo	48215021803	11	0.136242
Hidalgo	48215021804	11	0.05947
Hidalgo	48215021805	11	0.089599
Hidalgo	48215021806	11	0.061597
Hidalgo	48215021901	11	0.236462
Hidalgo	48215021903	11	0.129832
Hidalgo	48215021904	11	0.225986
Hidalgo	48215022001	11	0.160037
Hidalgo	48215022003	11	0.274678
Hidalgo	48215022004	11	0.171048
Hidalgo	48215022103	11	0.376117
Hidalgo	48215022104	11	0.133616
Hidalgo	48215022105	11	0.118393
Hidalgo	48215022106	11	0.24362
Hidalgo	48215022201	11	0.149402
Hidalgo	48215022203	11	0.254213
Hidalgo	48215022204	11	0.196565
Hidalgo	48215022300	11	0.340057
Hidalgo	48215022401	11	0.255997
Hidalgo	48215022402	11	0.151205
Hidalgo	48215022501	11	0.162585
Hidalgo	48215022502	11	0.160724
Hidalgo	48215022600	11	0.222097
Hidalgo	48215022701	11	0.4494
Hidalgo	48215022702	11	0.301575
Hidalgo	48215022800	11	0.189697
Hidalgo	48215022900	11	0.351363
Hidalgo	48215023000	11	0.154525
Hidalgo	48215023102	11	0.230433
Hidalgo	48215023103	11	0.26014
Hidalgo	48215023104	11	0.196179

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County	Census Tract	TDHCA Region	Diversity Index
Hidalgo	48215023503	11	0.092432
Hidalgo	48215023504	11	0.255729
Hidalgo	48215023507	11	0.212588
Hidalgo	48215023509	11	0.336292
Hidalgo	48215023510	11	0.551654
Hidalgo	48215023511	11	0.236073
Hidalgo	48215023512	11	0.60165
Hidalgo	48215023513	11	0.166723
Hidalgo	48215023514	11	0.221712
Hidalgo	48215023515	11	0.158157
Hidalgo	48215023600	11	0.239673
Hidalgo	48215023700	11	0.180289
Hidalgo	48215023801	11	0.186724
Hidalgo	48215023802	11	0.295196
Hidalgo	48215023902	11	0.438782
Hidalgo	48215023903	11	0.270019
Hidalgo	48215023904	11	0.314604
Hidalgo	48215024000	11	0.30841
Hidalgo	48215024105	11	0.200562
Hidalgo	48215024106	11	0.278766
Hidalgo	48215024107	11	0.27332
Hidalgo	48215024108	11	0.25485
Hidalgo	48215024109	11	0.114877
Hidalgo	48215024110	11	0.118619
Hidalgo	48215024111	11	0.186007
Hidalgo	48215024112	11	0.090287
Hidalgo	48215024113	11	0.129608
Hidalgo	48215024114	11	0.068083
Hidalgo	48215024201	11	0.081388
Hidalgo	48215024203	11	0.361376
Hidalgo	48215024204	11	0.156275
Hidalgo	48215024205	11	0.145204
Hidalgo	48215024301	11	0.369078
Hidalgo	48215024302	11	0.136379
Hidalgo	48215024402	11	0.114913
Hidalgo	48215024403	11	0.030352
Hidalgo	48215024404	11	0.003274
Hidalgo	48215024500	11	0.21888
Hidalgo	48215024600	11	0.186518
Hidalgo	48215980000	11	-

County	Census Tract	TDHCA Region	Diversity Index
Hill	48217960100	8	0.322962
Hill	48217960200	8	0.091386
Hill	48217960400	8	0.136714
Hill	48217960500	8	0.249041
Hill	48217960600	8	0.246984
Hill	48217960700	8	0.251722
Hill	48217960800	8	0.558748
Hill	48217960900	8	0.531719
Hill	48217961000	8	0.568111
Hill	48217961100	8	0.338785
Hill	48217961400	8	0.384041
Hockley	48219950100	1	0.493519
Hockley	48219950200	1	0.403786
Hockley	48219950300	1	0.558574
Hockley	48219950400	1	0.457049
Hockley	48219950500	1	0.519018
Hockley	48219950600	1	0.470281
Hockley	48219950700	1	0.481103
Hood	48221160100	3	0.254406
Hood	48221160204	3	0.206464
Hood	48221160205	3	0.288022
Hood	48221160206	3	0.18514
Hood	48221160207	3	0.20322
Hood	48221160208	3	0.413967
Hood	48221160209	3	0.200304
Hood	48221160210	3	0.058766
Hood	48221160301	3	0.082854
Hood	48221160302	3	0.117914
Hopkins	48223950100	4	0.149741
Hopkins	48223950200	4	0.113017
Hopkins	48223950300	4	0.290405
Hopkins	48223950401	4	0.459594
Hopkins	48223950402	4	0.352035
Hopkins	48223950500	4	0.520927
Hopkins	48223950600	4	0.574794
Hopkins	48223950700	4	0.444742
Hopkins	48223950800	4	0.275148
Houston	48225950100	5	0.253813
Houston	48225950200	5	0.377607
Houston	48225950300	5	0.572278

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Houston	48225950400	5	0.585505
Houston	48225950500	5	0.396947
Houston	48225950600	5	0.381265
Houston	48225950700	5	0.491699
Howard	48227950100	12	0.388948
Howard	48227950200	12	0.2269
Howard	48227950300	12	0.572788
Howard	48227950400	12	0.548848
Howard	48227950500	12	0.604954
Howard	48227950600	12	0.491578
Howard	48227950700	12	0.536542
Howard	48227950801	12	0.619951
Howard	48227950802	12	0.548397
Howard	48227950900	12	0.318534
Hudspeth	48229950300	13	0.509113
Hunt	48231960100	3	0.499841
Hunt	48231960200	3	0.242247
Hunt	48231960300	3	0.188372
Hunt	48231960400	3	0.524275
Hunt	48231960500	3	0.493193
Hunt	48231960600	3	0.648369
Hunt	48231960700	3	0.233025
Hunt	48231960800	3	0.666707
Hunt	48231960900	3	0.618001
Hunt	48231961000	3	0.59401
Hunt	48231961100	3	0.172889
Hunt	48231961200	3	0.301998
Hunt	48231961300	3	0.358216
Hunt	48231961400	3	0.253008
Hunt	48231961501	3	0.282218
Hunt	48231961502	3	0.296893
Hunt	48231961503	3	0.241082
Hunt	48231961600	3	0.193512
Hunt	48231961700	3	0.108961
Hutchinson	48233950200	1	0.248966
Hutchinson	48233950500	1	0.215589
Hutchinson	48233950600	1	0.581949
Hutchinson	48233950700	1	0.422913
Hutchinson	48233950800	1	0.56555
Hutchinson	48233950900	1	0.332521

County	Census Tract	TDHCA Region	Diversity Index
Hutchinson	48233951000	1	0.404844
Irion	48235950100	12	0.35953
Jack	48237950100	2	0.390337
Jack	48237950300	2	0.37724
Jack	48237950500	2	0.0877
Jackson	48239950100	10	0.421078
Jackson	48239950200	10	0.58716
Jackson	48239950300	10	0.445776
Jasper	48241950100	5	0.195874
Jasper	48241950200	5	0.536397
Jasper	48241950300	5	0.472774
Jasper	48241950400	5	0.443804
Jasper	48241950500	5	0.186346
Jasper	48241950600	5	0.432131
Jasper	48241950700	5	0.05336
Jasper	48241950800	5	0.135884
Jeff Davis	48243950100	13	0.4078
Jefferson	48245000101	5	0.563519
Jefferson	48245000102	5	0.45741
Jefferson	48245000103	5	0.155424
Jefferson	48245000200	5	0.403067
Jefferson	48245000302	5	0.500152
Jefferson	48245000304	5	0.593993
Jefferson	48245000306	5	0.344866
Jefferson	48245000307	5	0.609115
Jefferson	48245000308	5	0.58407
Jefferson	48245000309	5	0.57241
Jefferson	48245000310	5	0.458226
Jefferson	48245000400	5	0.441537
Jefferson	48245000500	5	0.565188
Jefferson	48245000600	5	0.539761
Jefferson	48245000700	5	0.122189
Jefferson	48245000900	5	0.28445
Jefferson	48245001100	5	0.58337
Jefferson	48245001200	5	0.664633
Jefferson	48245001301	5	0.538307
Jefferson	48245001302	5	0.61022
Jefferson	48245001303	5	0.621289
Jefferson	48245001700	5	0.306875
Jefferson	48245001900	5	0.645256

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Jefferson	48245002000	5	0.685107
Jefferson	48245002100	5	0.274592
Jefferson	48245002200	5	0.270967
Jefferson	48245002300	5	0.102837
Jefferson	48245002400	5	0.637392
Jefferson	48245002500	5	0.485724
Jefferson	48245002600	5	0.507863
Jefferson	48245005100	5	0.125861
Jefferson	48245005400	5	0.443028
Jefferson	48245005500	5	0.667174
Jefferson	48245005600	5	0.578287
Jefferson	48245005900	5	0.060635
Jefferson	48245006100	5	0.12525
Jefferson	48245006300	5	0.233758
Jefferson	48245006400	5	0.530546
Jefferson	48245006500	5	0.69102
Jefferson	48245006600	5	0.678896
Jefferson	48245006700	5	0.617905
Jefferson	48245006800	5	0.686138
Jefferson	48245006900	5	0.484868
Jefferson	48245007001	5	0.637302
Jefferson	48245007002	5	0.749443
Jefferson	48245007100	5	0.578647
Jefferson	48245010100	5	0.525157
Jefferson	48245010200	5	0.651553
Jefferson	48245010300	5	0.649683
Jefferson	48245010400	5	0.306441
Jefferson	48245010500	5	0.611481
Jefferson	48245010600	5	0.361855
Jefferson	48245010700	5	0.247381
Jefferson	48245010800	5	0.281672
Jefferson	48245010901	5	0.164332
Jefferson	48245010902	5	0.397204
Jefferson	48245011001	5	0.278155
Jefferson	48245011002	5	0.182648
Jefferson	48245011101	5	0.21928
Jefferson	48245011102	5	0.326812
Jefferson	48245011201	5	0.383826
Jefferson	48245011202	5	0.62119
Jefferson	48245011203	5	0.613842

County	Census Tract	TDHCA Region	Diversity Index
Jefferson	48245011302	5	0.723403
Jefferson	48245011303	5	0.146099
Jefferson	48245011304	5	0.38917
Jefferson	48245011400	5	0.465244
Jefferson	48245011500	5	0.217424
Jefferson	48245011600	5	0.246977
Jefferson	48245011700	5	0.546433
Jefferson	48245011800	5	0.174978
Jefferson	48245980000	5	0.501898
Jefferson	48245990000	5	-
Jim Hogg	48247950200	11	0.158844
Jim Hogg	48247950400	11	0.196634
Jim Wells	48249950100	10	0.454583
Jim Wells	48249950200	10	0.254523
Jim Wells	48249950300	10	0.30633
Jim Wells	48249950400	10	0.305634
Jim Wells	48249950500	10	0.189542
Jim Wells	48249950600	10	0.07368
Jim Wells	48249950700	10	0.265992
Johnson	48251130100	3	0.193036
Johnson	48251130204	3	0.216548
Johnson	48251130205	3	0.251633
Johnson	48251130207	3	0.230823
Johnson	48251130208	3	0.174806
Johnson	48251130210	3	0.2669
Johnson	48251130211	3	0.198867
Johnson	48251130212	3	0.403413
Johnson	48251130213	3	0.371232
Johnson	48251130214	3	0.271903
Johnson	48251130215	3	0.379146
Johnson	48251130302	3	0.334677
Johnson	48251130303	3	0.654738
Johnson	48251130304	3	0.530463
Johnson	48251130405	3	0.206932
Johnson	48251130406	3	0.149534
Johnson	48251130407	3	0.585945
Johnson	48251130408	3	0.535164
Johnson	48251130409	3	0.250439
Johnson	48251130410	3	0.348905
Johnson	48251130500	3	0.161834

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Johnson	48251130601	3	0.243138
Johnson	48251130602	3	0.327682
Johnson	48251130700	3	0.406002
Johnson	48251130800	3	0.53219
Johnson	48251130900	3	0.510808
Johnson	48251131000	3	0.312754
Johnson	48251131100	3	0.365844
Jones	48253020101	2	0.245982
Jones	48253020102	2	0.754754
Jones	48253020200	2	0.502755
Jones	48253020300	2	0.435759
Jones	48253020400	2	0.526713
Jones	48253020500	2	0.128171
Karnes	48255970100	9	0.123131
Karnes	48255970200	9	0.624877
Karnes	48255970300	9	0.699751
Karnes	48255970400	9	0.578679
Kaufman	48257050201	3	0.466405
Kaufman	48257050203	3	0.442457
Kaufman	48257050204	3	0.590364
Kaufman	48257050205	3	0.361785
Kaufman	48257050206	3	0.444342
Kaufman	48257050300	3	0.584912
Kaufman	48257050400	3	0.588606
Kaufman	48257050500	3	0.556669
Kaufman	48257050600	3	0.440884
Kaufman	48257050701	3	0.390204
Kaufman	48257050703	3	0.347648
Kaufman	48257050704	3	0.491098
Kaufman	48257050800	3	0.190335
Kaufman	48257051000	3	0.653715
Kaufman	48257051100	3	0.443229
Kaufman	48257051201	3	0.353812
Kaufman	48257051202	3	0.208734
Kaufman	48257051300	3	0.215564
Kendall	48259970100	9	0.464085
Kendall	48259970301	9	0.26493
Kendall	48259970302	9	0.224991
Kendall	48259970401	9	0.306994
Kendall	48259970402	9	0.252509

County	Census Tract	TDHCA Region	Diversity Index
Kendall	48259970500	9	0.456792
Kenedy	48261950100	10	0.364092
Kenedy	48261990000	10	-
Kent	48263950100	2	0.26414
Kerr	48265960100	9	0.288292
Kerr	48265960200	9	0.196405
Kerr	48265960301	9	0.358534
Kerr	48265960302	9	0.331057
Kerr	48265960401	9	0.544987
Kerr	48265960402	9	0.372822
Kerr	48265960500	9	0.513568
Kerr	48265960600	9	0.463117
Kerr	48265960700	9	0.259843
Kerr	48265960800	9	0.437446
Kimble	48267950100	12	0.296864
Kimble	48267950200	12	0.358721
King	48269950100	1	0.285425
Kinney	48271950100	11	0.4026
Kleberg	48273020100	10	0.413551
Kleberg	48273020200	10	0.258765
Kleberg	48273020300	10	0.509907
Kleberg	48273020400	10	0.463236
Kleberg	48273020500	10	0.544434
Kleberg	48273990000	10	-
Knox	48275950100	2	0.40514
Knox	48275950200	2	0.537982
Lamar	48277000101	4	0.222595
Lamar	48277000102	4	0.235681
Lamar	48277000200	4	0.244479
Lamar	48277000300	4	0.216598
Lamar	48277000401	4	0.391691
Lamar	48277000402	4	0.197692
Lamar	48277000500	4	0.553442
Lamar	48277000600	4	0.503277
Lamar	48277000700	4	0.420357
Lamar	48277000800	4	0.510692
Lamar	48277000900	4	0.279905
Lamar	48277001000	4	0.421508
Lamb	48279950100	1	0.461484
Lamb	48279950200	1	0.454298

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County	Census Tract	TDHCA Region	Diversity Index
Lamb	48279950300	1	0.48339
Lamb	48279950500	1	0.55517
Lamb	48279950600	1	0.5229
Lampasas	48281950100	8	0.275988
Lampasas	48281950301	8	0.33074
Lampasas	48281950302	8	0.290302
Lampasas	48281950400	8	0.534215
Lampasas	48281950500	8	0.381655
La Salle	48283950300	11	0.4538
Lavaca	48285000100	10	0.148378
Lavaca	48285000200	10	0.378131
Lavaca	48285000300	10	0.250915
Lavaca	48285000400	10	0.257849
Lavaca	48285000500	10	0.384617
Lavaca	48285000600	10	0.605619
Lee	48287000100	7	0.190179
Lee	48287000200	7	0.551645
Lee	48287000300	7	0.271006
Lee	48287000400	7	0.6553
Leon	48289950100	8	0.41403
Leon	48289950200	8	0.201019
Leon	48289950300	8	0.301359
Liberty	48291700100	6	0.508939
Liberty	48291700200	6	0.548166
Liberty	48291700300	6	0.444776
Liberty	48291700400	6	0.16016
Liberty	48291700500	6	0.165251
Liberty	48291700600	6	0.289849
Liberty	48291700700	6	0.147642
Liberty	48291700800	6	0.323314
Liberty	48291700900	6	0.578017
Liberty	48291701000	6	0.653594
Liberty	48291701100	6	0.275078
Liberty	48291701200	6	0.317115
Liberty	48291701300	6	0.139245
Liberty	48291701400	6	0.62954
Limestone	48293970100	8	0.54095
Limestone	48293970200	8	0.496274
Limestone	48293970300	8	0.621483
Limestone	48293970400	8	0.620384

County	Census Tract	TDHCA Region	Diversity Index
Limestone	48293970500	8	0.620761
Limestone	48293970600	8	0.478342
Limestone	48293970700	8	0.196168
Limestone	48293970800	8	0.195063
Lipscomb	48295950200	1	0.520169
Lipscomb	48295950300	1	0.286205
Live Oak	48297950100	10	0.570737
Live Oak	48297950200	10	0.540896
Live Oak	48297950300	10	0.355962
Live Oak	48297950400	10	0.405297
Llano	48299970100	7	0.072717
Llano	48299970200	7	0.373422
Llano	48299970300	7	0.057795
Llano	48299970400	7	0.137501
Llano	48299970500	7	0.222087
Llano	48299970600	7	0.041023
Loving	48301950100	12	0.380125
Lubbock	48303000100	1	0.569725
Lubbock	48303000201	1	0.583205
Lubbock	48303000202	1	0.470539
Lubbock	48303000301	1	0.711752
Lubbock	48303000302	1	0.642767
Lubbock	48303000402	1	0.532512
Lubbock	48303000403	1	0.417048
Lubbock	48303000404	1	0.476148
Lubbock	48303000405	1	0.609528
Lubbock	48303000500	1	0.463408
Lubbock	48303000603	1	0.463497
Lubbock	48303000605	1	0.453656
Lubbock	48303000607	1	0.616269
Lubbock	48303000700	1	0.561221
Lubbock	48303000900	1	0.620364
Lubbock	48303001000	1	0.635872
Lubbock	48303001200	1	0.420917
Lubbock	48303001300	1	0.510264
Lubbock	48303001400	1	0.549406
Lubbock	48303001501	1	0.244386
Lubbock	48303001502	1	0.172138
Lubbock	48303001601	1	0.239511
Lubbock	48303001602	1	0.58173

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Lubbock	48303001702	1	0.366461
Lubbock	48303001705	1	0.392578
Lubbock	48303001706	1	0.579303
Lubbock	48303001707	1	0.431407
Lubbock	48303001708	1	0.520274
Lubbock	48303001709	1	0.676287
Lubbock	48303001801	1	0.612247
Lubbock	48303001803	1	0.515241
Lubbock	48303001804	1	0.387991
Lubbock	48303001901	1	0.523618
Lubbock	48303001903	1	0.298521
Lubbock	48303001904	1	0.294624
Lubbock	48303002001	1	0.480266
Lubbock	48303002002	1	0.590429
Lubbock	48303002101	1	0.561392
Lubbock	48303002102	1	0.429935
Lubbock	48303002202	1	0.634829
Lubbock	48303002203	1	0.560779
Lubbock	48303002204	1	0.657739
Lubbock	48303002300	1	0.554707
Lubbock	48303002400	1	0.485604
Lubbock	48303002500	1	0.693334
Lubbock	48303010101	1	0.350283
Lubbock	48303010102	1	0.451838
Lubbock	48303010200	1	0.592909
Lubbock	48303010301	1	0.352654
Lubbock	48303010302	1	0.416022
Lubbock	48303010402	1	0.585421
Lubbock	48303010403	1	0.347893
Lubbock	48303010404	1	0.497908
Lubbock	48303010405	1	0.511409
Lubbock	48303010406	1	0.320338
Lubbock	48303010407	1	0.405559
Lubbock	48303010408	1	0.355523
Lubbock	48303010502	1	0.283467
Lubbock	48303010504	1	0.273088
Lubbock	48303010505	1	0.5324
Lubbock	48303010506	1	0.453303
Lubbock	48303010508	1	0.537112
Lubbock	48303010509	1	0.208174

County	Census Tract	TDHCA Region	Diversity Index
Lubbock	48303010510	1	0.181409
Lubbock	48303010511	1	0.455871
Lubbock	48303010600	1	0.652351
Lubbock	48303010700	1	0.205038
Lubbock	48303980000	1	-
Lynn	48305950400	1	0.514816
Lynn	48305950500	1	0.590699
Lynn	48305950600	1	0.550352
McCulloch	48307950300	12	0.532182
McCulloch	48307950400	12	0.480313
McCulloch	48307950500	12	0.300671
McLennan	48309000100	8	0.58517
McLennan	48309000200	8	0.438284
McLennan	48309000300	8	0.439156
McLennan	48309000400	8	0.609414
McLennan	48309000598	8	0.473552
McLennan	48309000700	8	0.57362
McLennan	48309000800	8	0.668435
McLennan	48309000900	8	0.617796
McLennan	48309001000	8	0.674621
McLennan	48309001100	8	0.58461
McLennan	48309001200	8	0.566474
McLennan	48309001300	8	0.67802
McLennan	48309001400	8	0.419082
McLennan	48309001500	8	0.244065
McLennan	48309001600	8	0.650577
McLennan	48309001700	8	0.659334
McLennan	48309001800	8	0.631546
McLennan	48309001900	8	0.665863
McLennan	48309002000	8	0.258052
McLennan	48309002100	8	0.71013
McLennan	48309002302	8	0.648397
McLennan	48309002498	8	0.54908
McLennan	48309002501	8	0.58108
McLennan	48309002503	8	0.230404
McLennan	48309002504	8	0.320201
McLennan	48309002600	8	0.479768
McLennan	48309002700	8	0.69645
McLennan	48309002800	8	0.349186
McLennan	48309002900	8	0.326703



Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
McLennan	48309003000	8	0.551345
McLennan	48309003200	8	0.636046
McLennan	48309003300	8	0.523625
McLennan	48309003400	8	0.263394
McLennan	48309003500	8	0.135213
McLennan	48309003601	8	0.47458
McLennan	48309003602	8	0.28434
McLennan	48309003701	8	0.416327
McLennan	48309003703	8	0.227616
McLennan	48309003706	8	0.470469
McLennan	48309003707	8	0.488954
McLennan	48309003708	8	0.383891
McLennan	48309003801	8	0.184781
McLennan	48309003802	8	0.306735
McLennan	48309003900	8	0.445793
McLennan	48309004000	8	0.148369
McLennan	48309004102	8	0.171552
McLennan	48309004103	8	0.363014
McLennan	48309004201	8	0.227637
McLennan	48309004202	8	0.168917
McLennan	48309004300	8	0.57697
McLennan	48309980000	8	-
McMullen	48311950100	10	0.454796
Madison	48313000100	8	0.703876
Madison	48313000200	8	0.167765
Madison	48313000300	8	0.137147
Madison	48313000400	8	0.52294
Marion	48315950100	4	0.38481
Marion	48315950200	4	0.360037
Marion	48315950300	4	0.164163
Marion	48315950400	4	0.440732
Martin	48317950100	12	0.480506
Martin	48317950200	12	0.54362
Mason	48319950100	12	0.512001
Mason	48319950200	12	0.247621
Matagorda	48321730100	6	0.6319
Matagorda	48321730201	6	0.565827
Matagorda	48321730202	6	0.575337
Matagorda	48321730301	6	0.531171
Matagorda	48321730302	6	0.688874

County	Census Tract	TDHCA Region	Diversity Index
Matagorda	48321730303	6	0.561937
Matagorda	48321730400	6	0.574989
Matagorda	48321730501	6	0.346301
Matagorda	48321730600	6	0.665244
Matagorda	48321730700	6	0.489769
Matagorda	48321990000	6	-
Maverick	48323950201	11	0.180689
Maverick	48323950204	11	0.064999
Maverick	48323950205	11	0.092183
Maverick	48323950300	11	0.223591
Maverick	48323950400	11	0.122894
Maverick	48323950500	11	0.216191
Maverick	48323950601	11	0.156048
Maverick	48323950602	11	0.139694
Maverick	48323950700	11	0.141266
Medina	48325000101	9	0.444604
Medina	48325000102	9	0.473206
Medina	48325000200	9	0.382005
Medina	48325000300	9	0.609502
Medina	48325000401	9	0.329669
Medina	48325000402	9	0.475507
Medina	48325000500	9	0.472591
Medina	48325000800	9	0.476629
Menard	48327950300	12	0.54451
Midland	48329000100	12	0.636389
Midland	48329000200	12	0.375437
Midland	48329000302	12	0.538179
Midland	48329000303	12	0.26653
Midland	48329000304	12	0.40035
Midland	48329000305	12	0.438719
Midland	48329000401	12	0.563705
Midland	48329000402	12	0.555669
Midland	48329000500	12	0.437254
Midland	48329000600	12	0.564453
Midland	48329001100	12	0.577966
Midland	48329001200	12	0.617154
Midland	48329001300	12	0.585267
Midland	48329001400	12	0.455114
Midland	48329001500	12	0.637533
Midland	48329001700	12	0.442361

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Midland	48329010104	12	0.530924
Midland	48329010105	12	0.56365
Midland	48329010106	12	0.40973
Midland	48329010107	12	0.495029
Midland	48329010108	12	0.458844
Midland	48329010109	12	0.500283
Midland	48329010112	12	0.369072
Midland	48329010113	12	0.410076
Midland	48329010114	12	0.501841
Midland	48329010200	12	0.431205
Midland	48329980000	12	-
Milam	48331950100	8	0.495794
Milam	48331950300	8	0.370389
Milam	48331950401	8	0.528802
Milam	48331950402	8	0.575092
Milam	48331950500	8	0.27246
Milam	48331950700	8	0.592623
Milam	48331950800	8	0.287077
Mills	48333950100	8	0.196956
Mills	48333950200	8	0.258939
Mitchell	48335950200	2	0.627567
Mitchell	48335950400	2	0.34703
Montague	48337950100	2	0.104252
Montague	48337950200	2	0.107504
Montague	48337950300	2	0.297806
Montague	48337950400	2	0.235785
Montague	48337950500	2	0.211319
Montague	48337950600	2	0.113871
Montgomery	48339690100	6	0.351449
Montgomery	48339690201	6	0.250163
Montgomery	48339690202	6	0.367159
Montgomery	48339690300	6	0.563682
Montgomery	48339690401	6	0.329103
Montgomery	48339690402	6	0.362514
Montgomery	48339690500	6	0.242122
Montgomery	48339690601	6	0.282344
Montgomery	48339690602	6	0.433584
Montgomery	48339690700	6	0.284408
Montgomery	48339690800	6	0.225776
Montgomery	48339690900	6	0.268269

County	Census Tract	TDHCA Region	Diversity Index
Montgomery	48339691000	6	0.247906
Montgomery	48339691100	6	0.236358
Montgomery	48339691200	6	0.296324
Montgomery	48339691301	6	0.360224
Montgomery	48339691302	6	0.407782
Montgomery	48339691400	6	0.526493
Montgomery	48339691500	6	0.490512
Montgomery	48339691601	6	0.382827
Montgomery	48339691602	6	0.418809
Montgomery	48339691700	6	0.324586
Montgomery	48339691800	6	0.534298
Montgomery	48339691900	6	0.45004
Montgomery	48339692001	6	0.441822
Montgomery	48339692002	6	0.498961
Montgomery	48339692100	6	0.541603
Montgomery	48339692200	6	0.351758
Montgomery	48339692300	6	0.511406
Montgomery	48339692400	6	0.496819
Montgomery	48339692500	6	0.424097
Montgomery	48339692601	6	0.507699
Montgomery	48339692602	6	0.552508
Montgomery	48339692700	6	0.456765
Montgomery	48339692801	6	0.404065
Montgomery	48339692802	6	0.524935
Montgomery	48339692900	6	0.35047
Montgomery	48339693000	6	0.492681
Montgomery	48339693101	6	0.615559
Montgomery	48339693102	6	0.528288
Montgomery	48339693200	6	0.305019
Montgomery	48339693300	6	0.448888
Montgomery	48339693400	6	0.576624
Montgomery	48339693500	6	0.504963
Montgomery	48339693600	6	0.516365
Montgomery	48339693700	6	0.309741
Montgomery	48339693800	6	0.586409
Montgomery	48339693900	6	0.500106
Montgomery	48339694000	6	0.369733
Montgomery	48339694101	6	0.505781
Montgomery	48339694102	6	0.418033
Montgomery	48339694201	6	0.377989

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Montgomery	48339694202	6	0.160074
Montgomery	48339694301	6	0.17739
Montgomery	48339694302	6	0.159017
Montgomery	48339694400	6	0.418966
Montgomery	48339694500	6	0.185814
Montgomery	48339694600	6	0.33782
Montgomery	48339694700	6	0.24125
Moore	48341950100	1	0.504019
Moore	48341950200	1	0.616721
Moore	48341950300	1	0.604257
Moore	48341950400	1	0.664367
Morris	48343950100	4	0.337735
Morris	48343950200	4	0.431192
Morris	48343950300	4	0.575354
Motley	48345950100	1	0.200936
Nacogdoches	48347950100	5	0.39075
Nacogdoches	48347950200	5	0.270057
Nacogdoches	48347950301	5	0.400668
Nacogdoches	48347950302	5	0.597562
Nacogdoches	48347950400	5	0.295835
Nacogdoches	48347950501	5	0.379343
Nacogdoches	48347950502	5	0.270512
Nacogdoches	48347950600	5	0.542622
Nacogdoches	48347950700	5	0.617842
Nacogdoches	48347950800	5	0.708248
Nacogdoches	48347950900	5	0.284875
Nacogdoches	48347951000	5	0.558515
Nacogdoches	48347951100	5	0.192683
Navarro	48349970100	3	0.549633
Navarro	48349970200	3	0.552098
Navarro	48349970300	3	0.540996
Navarro	48349970400	3	0.328071
Navarro	48349970500	3	0.564337
Navarro	48349970600	3	0.471003
Navarro	48349970700	3	0.421345
Navarro	48349970800	3	0.678032
Navarro	48349970900	3	0.675387
Navarro	48349971000	3	0.281284
Newton	48351950100	5	0.337204
Newton	48351950200	5	0.391931

County	Census Tract	TDHCA Region	Diversity Index
Newton	48351950300	5	0.484677
Newton	48351950400	5	0.088468
Nolan	48353950100	2	0.264553
Nolan	48353950200	2	0.480665
Nolan	48353950300	2	0.569666
Nolan	48353950400	2	0.574192
Nolan	48353950500	2	0.346345
Nueces	48355000500	10	0.555584
Nueces	48355000600	10	0.329638
Nueces	48355000700	10	0.520468
Nueces	48355000800	10	0.442276
Nueces	48355000900	10	0.173655
Nueces	48355001000	10	0.399592
Nueces	48355001100	10	0.351154
Nueces	48355001200	10	0.507088
Nueces	48355001300	10	0.23042
Nueces	48355001400	10	0.524294
Nueces	48355001500	10	0.346655
Nueces	48355001601	10	0.202356
Nueces	48355001602	10	0.269559
Nueces	48355001701	10	0.32128
Nueces	48355001702	10	0.406005
Nueces	48355001801	10	0.187286
Nueces	48355001802	10	0.270386
Nueces	48355001902	10	0.327716
Nueces	48355001903	10	0.361791
Nueces	48355001904	10	0.267925
Nueces	48355002001	10	0.294159
Nueces	48355002002	10	0.255191
Nueces	48355002101	10	0.54088
Nueces	48355002102	10	0.451774
Nueces	48355002200	10	0.480626
Nueces	48355002301	10	0.340377
Nueces	48355002303	10	0.425277
Nueces	48355002304	10	0.405631
Nueces	48355002400	10	0.442858
Nueces	48355002500	10	0.492999
Nueces	48355002601	10	0.470739
Nueces	48355002602	10	0.391513
Nueces	48355002603	10	0.437886

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Nueces	48355002703	10	0.482182
Nueces	48355002704	10	0.601675
Nueces	48355002705	10	0.551962
Nueces	48355002706	10	0.541117
Nueces	48355002900	10	0.594756
Nueces	48355003001	10	0.567096
Nueces	48355003002	10	0.549349
Nueces	48355003101	10	0.34893
Nueces	48355003102	10	0.479371
Nueces	48355003202	10	0.565133
Nueces	48355003203	10	0.46182
Nueces	48355003204	10	0.547358
Nueces	48355003303	10	0.402669
Nueces	48355003304	10	0.550839
Nueces	48355003305	10	0.471537
Nueces	48355003306	10	0.504476
Nueces	48355003401	10	0.520008
Nueces	48355003402	10	0.436728
Nueces	48355003500	10	0.386708
Nueces	48355003601	10	0.567659
Nueces	48355003602	10	0.486845
Nueces	48355003603	10	0.494892
Nueces	48355003700	10	0.451838
Nueces	48355005102	10	0.135126
Nueces	48355005404	10	0.554686
Nueces	48355005406	10	0.515947
Nueces	48355005407	10	0.448798
Nueces	48355005408	10	0.480077
Nueces	48355005409	10	0.60498
Nueces	48355005410	10	0.501122
Nueces	48355005411	10	0.573602
Nueces	48355005412	10	0.628096
Nueces	48355005413	10	0.607747
Nueces	48355005414	10	0.587663
Nueces	48355005415	10	0.618561
Nueces	48355005416	10	0.546022
Nueces	48355005417	10	0.603017
Nueces	48355005601	10	0.196075
Nueces	48355005602	10	0.103433
Nueces	48355005801	10	0.365499

County	Census Tract	TDHCA Region	Diversity Index
Nueces	48355005802	10	0.432077
Nueces	48355005900	10	0.324731
Nueces	48355006000	10	0.409336
Nueces	48355006100	10	0.379696
Nueces	48355006200	10	0.17467
Nueces	48355006300	10	0.494783
Nueces	48355006400	10	0.604286
Nueces	48355980000	10	0.298948
Nueces	48355990000	10	-
Ochiltree	48357950100	1	0.285673
Ochiltree	48357950300	1	0.511434
Ochiltree	48357950400	1	0.541318
Oldham	48359950100	1	0.371862
Orange	48361020200	5	0.414032
Orange	48361020300	5	0.405283
Orange	48361020500	5	0.393532
Orange	48361020700	5	0.436604
Orange	48361020800	5	0.426569
Orange	48361020900	5	0.522697
Orange	48361021000	5	0.146426
Orange	48361021100	5	0.076309
Orange	48361021200	5	0.134046
Orange	48361021300	5	0.415731
Orange	48361021400	5	0.088441
Orange	48361021501	5	0.216126
Orange	48361021502	5	0.139114
Orange	48361021600	5	0.209718
Orange	48361021700	5	0.205845
Orange	48361021800	5	0.067302
Orange	48361021900	5	0.102413
Orange	48361022000	5	0.087661
Orange	48361022200	5	0.120658
Orange	48361022300	5	0.169698
Orange	48361022400	5	0.167483
Palo Pinto	48363000100	3	0.213759
Palo Pinto	48363000200	3	0.270228
Palo Pinto	48363000300	3	0.141012
Palo Pinto	48363000400	3	0.220154
Palo Pinto	48363000500	3	0.252361
Palo Pinto	48363000600	3	0.424925

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Palo Pinto	48363000700	3	0.439414
Palo Pinto	48363000800	3	0.586935
Palo Pinto	48363000900	3	0.41388
Panola	48365950100	4	0.308439
Panola	48365950200	4	0.351697
Panola	48365950300	4	0.482352
Panola	48365950400	4	0.426262
Panola	48365950500	4	0.178012
Panola	48365950600	4	0.119322
Parker	48367140101	3	0.348698
Parker	48367140102	3	0.303547
Parker	48367140200	3	0.214121
Parker	48367140300	3	0.270869
Parker	48367140403	3	0.14211
Parker	48367140405	3	0.207377
Parker	48367140407	3	0.263024
Parker	48367140408	3	0.199574
Parker	48367140409	3	0.364801
Parker	48367140410	3	0.129613
Parker	48367140411	3	0.218663
Parker	48367140501	3	0.135498
Parker	48367140502	3	0.320901
Parker	48367140601	3	0.104921
Parker	48367140602	3	0.33006
Parker	48367140703	3	0.12013
Parker	48367140704	3	0.227216
Parker	48367140705	3	0.183676
Parker	48367140706	3	0.187842
Parmer	48369950200	1	0.57846
Parmer	48369950300	1	0.491893
Pecos	48371950100	12	0.613611
Pecos	48371950300	12	0.268862
Pecos	48371950400	12	0.497811
Pecos	48371950500	12	0.574853
Polk	48373210101	5	0.117695
Polk	48373210102	5	0.228508
Polk	48373210203	5	0.554922
Polk	48373210204	5	0.583253
Polk	48373210205	5	0.221085
Polk	48373210206	5	0.126818

County	Census Tract	TDHCA Region	Diversity Index
Polk	48373210301	5	0.111738
Polk	48373210302	5	0.443998
Polk	48373210400	5	0.550787
Polk	48373210500	5	0.508077
Potter	48375010100	1	0.300201
Potter	48375010200	1	0.220707
Potter	48375010300	1	0.688389
Potter	48375010400	1	0.292565
Potter	48375010600	1	0.468394
Potter	48375010700	1	0.483443
Potter	48375011000	1	0.411558
Potter	48375011500	1	0.328862
Potter	48375011600	1	0.621186
Potter	48375011700	1	0.576245
Potter	48375011800	1	0.464226
Potter	48375011900	1	0.57001
Potter	48375012000	1	0.589932
Potter	48375012200	1	0.448351
Potter	48375012600	1	0.640001
Potter	48375012800	1	0.603468
Potter	48375013000	1	0.50366
Potter	48375013200	1	0.266494
Potter	48375013300	1	0.264708
Potter	48375013400	1	0.234829
Potter	48375013900	1	0.651266
Potter	48375014100	1	0.544832
Potter	48375014300	1	0.159868
Potter	48375014401	1	0.620622
Potter	48375014500	1	0.455697
Potter	48375014700	1	0.483236
Potter	48375014800	1	0.619639
Potter	48375014900	1	0.641191
Potter	48375015000	1	0.47983
Potter	48375015100	1	0.374669
Potter	48375015200	1	0.348119
Potter	48375015300	1	0.666119
Potter	48375015400	1	0.527663
Potter	48375980000	1	-
Presidio	48377950100	13	0.42744
Presidio	48377950200	13	0.211027

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Rains	48379950100	4	0.155089
Rains	48379950200	4	0.283588
Randall	48381020100	1	0.219386
Randall	48381020200	1	0.382227
Randall	48381020300	1	0.385296
Randall	48381020400	1	0.262802
Randall	48381020500	1	0.527863
Randall	48381020600	1	0.562617
Randall	48381020800	1	0.422667
Randall	48381020900	1	0.499163
Randall	48381021000	1	0.308394
Randall	48381021101	1	0.263596
Randall	48381021102	1	0.550654
Randall	48381021200	1	0.246715
Randall	48381021300	1	0.490615
Randall	48381021500	1	0.208079
Randall	48381021602	1	0.286313
Randall	48381021603	1	0.321206
Randall	48381021604	1	0.349148
Randall	48381021605	1	0.319623
Randall	48381021606	1	0.237799
Randall	48381021608	1	0.284917
Randall	48381021609	1	0.327564
Randall	48381021702	1	0.21587
Randall	48381021703	1	0.278942
Randall	48381021704	1	0.192034
Randall	48381021801	1	0.323261
Randall	48381021802	1	0.450153
Randall	48381021900	1	0.148601
Randall	48381022001	1	0.379916
Randall	48381022002	1	0.589465
Reagan	48383950100	12	0.565773
Real	48385950100	11	0.260874
Red River	48387950100	4	0.345909
Red River	48387950500	4	0.502343
Red River	48387950600	4	0.106394
Red River	48387950700	4	0.192503
Reeves	48389950100	12	0.400279
Reeves	48389950200	12	0.511754
Reeves	48389950300	12	0.506426

County	Census Tract	TDHCA Region	Diversity Index
Reeves	48389950400	12	0.628998
Reeves	48389950500	12	0.517025
Refugio	48391950200	10	0.63491
Refugio	48391950400	10	0.540349
Roberts	48393950100	1	0.064992
Robertson	48395960100	8	0.335164
Robertson	48395960200	8	0.618687
Robertson	48395960300	8	0.289717
Robertson	48395960400	8	0.262807
Robertson	48395960500	8	0.632567
Rockwall	48397040101	3	0.30037
Rockwall	48397040102	3	0.318683
Rockwall	48397040200	3	0.283779
Rockwall	48397040301	3	0.498844
Rockwall	48397040302	3	0.237105
Rockwall	48397040401	3	0.480224
Rockwall	48397040402	3	0.433666
Rockwall	48397040503	3	0.570884
Rockwall	48397040504	3	0.198337
Rockwall	48397040505	3	0.439365
Rockwall	48397040506	3	0.170678
Runnels	48399950100	2	0.302833
Runnels	48399950200	2	0.450738
Runnels	48399950500	2	0.346059
Runnels	48399950600	2	0.47236
Rusk	48401950100	4	0.377995
Rusk	48401950200	4	0.438239
Rusk	48401950300	4	0.412077
Rusk	48401950400	4	0.362483
Rusk	48401950501	4	0.422741
Rusk	48401950502	4	0.544456
Rusk	48401950600	4	0.151681
Rusk	48401950700	4	0.534202
Rusk	48401950800	4	0.585584
Rusk	48401950900	4	0.565355
Rusk	48401951000	4	0.487674
Rusk	48401951100	4	0.397832
Rusk	48401951200	4	0.395275
Sabine	48403950100	5	0.219014
Sabine	48403950200	5	0.12389

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County	Census Tract	TDHCA Region	Diversity Index
Sabine	48403950300	5	0.243199
San Augustine	48405950100	5	0.393029
San Augustine	48405950200	5	0.537994
San Augustine	48405950300	5	0.121654
San Jacinto	48407200101	5	0.345214
San Jacinto	48407200102	5	0.403823
San Jacinto	48407200200	5	0.35718
San Jacinto	48407200300	5	0.20157
San Patricio	48409010201	10	0.433578
San Patricio	48409010202	10	0.540968
San Patricio	48409010301	10	0.521289
San Patricio	48409010302	10	0.508015
San Patricio	48409010500	10	0.205126
San Patricio	48409010601	10	0.531789
San Patricio	48409010602	10	0.436181
San Patricio	48409010603	10	0.253698
San Patricio	48409010604	10	0.364938
San Patricio	48409010700	10	0.41875
San Patricio	48409010800	10	0.35966
San Patricio	48409010900	10	0.446302
San Patricio	48409011000	10	0.403252
San Patricio	48409011100	10	0.266216
San Patricio	48409011200	10	0.428835
San Patricio	48409011300	10	0.173191
San Saba	48411950100	8	0.483968
San Saba	48411950200	8	0.377775
Schleicher	48413950300	12	0.551877
Scurry	48415950100	2	0.605182
Scurry	48415950200	2	0.418344
Scurry	48415950300	2	0.400495
Scurry	48415950600	2	0.528107
Shackelford	48417950300	2	0.212371
Shelby	48419950100	5	0.423188
Shelby	48419950200	5	0.437297
Shelby	48419950300	5	0.409489
Shelby	48419950400	5	0.635327
Shelby	48419950500	5	0.198356
Shelby	48419950600	5	0.383931
Sherman	48421950200	1	0.468485
Smith	48423000100	4	0.59474

County	Census Tract	TDHCA Region	Diversity Index
Smith	48423000201	4	0.309582
Smith	48423000202	4	0.484282
Smith	48423000300	4	0.546445
Smith	48423000400	4	0.599134
Smith	48423000500	4	0.694426
Smith	48423000600	4	0.503545
Smith	48423000700	4	0.414972
Smith	48423000800	4	0.599591
Smith	48423000900	4	0.665845
Smith	48423001000	4	0.492422
Smith	48423001101	4	0.344599
Smith	48423001102	4	0.267188
Smith	48423001200	4	0.496013
Smith	48423001300	4	0.505834
Smith	48423001401	4	0.181593
Smith	48423001403	4	0.212712
Smith	48423001404	4	0.240751
Smith	48423001500	4	0.250784
Smith	48423001601	4	0.595482
Smith	48423001602	4	0.495059
Smith	48423001604	4	0.611548
Smith	48423001700	4	0.595955
Smith	48423001801	4	0.559772
Smith	48423001802	4	0.46227
Smith	48423001803	4	0.384132
Smith	48423001901	4	0.445834
Smith	48423001905	4	0.3228
Smith	48423001906	4	0.252871
Smith	48423001907	4	0.192631
Smith	48423001908	4	0.340187
Smith	48423002003	4	0.539494
Smith	48423002004	4	0.178513
Smith	48423002006	4	0.359514
Smith	48423002007	4	0.477587
Smith	48423002008	4	0.253695
Smith	48423002009	4	0.261201
Smith	48423002101	4	0.443315
Smith	48423002102	4	0.1454
Smith	48423002200	4	0.318849
Smith	48423980000	4	-

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County	Census Tract	TDHCA Region	Diversity Index
Somervell	48425000100	3	0.312873
Somervell	48425000200	3	0.224102
Starr	48427950101	11	0.109636
Starr	48427950104	11	0.180339
Starr	48427950105	11	0.061808
Starr	48427950106	11	0.198761
Starr	48427950107	11	0.058665
Starr	48427950108	11	0.139234
Starr	48427950202	11	0.071005
Starr	48427950203	11	0.061504
Starr	48427950204	11	0.088829
Starr	48427950401	11	0.046305
Starr	48427950402	11	0.102195
Starr	48427950500	11	0.119724
Starr	48427950600	11	0.06665
Starr	48427950701	11	0.110147
Starr	48427950702	11	0.098074
Stephens	48429950200	2	0.387191
Stephens	48429950300	2	0.529456
Stephens	48429950500	2	0.22838
Sterling	48431950100	12	0.442021
Stonewall	48433950300	2	0.39077
Sutton	48435950300	12	0.588089
Swisher	48437950200	1	0.513428
Swisher	48437950300	1	0.585545
Swisher	48437950400	1	0.550822
Tarrant	48439100101	3	0.615617
Tarrant	48439100102	3	0.54284
Tarrant	48439100201	3	0.406919
Tarrant	48439100202	3	0.391669
Tarrant	48439100300	3	0.422738
Tarrant	48439100400	3	0.362702
Tarrant	48439100501	3	0.643869
Tarrant	48439100502	3	0.599578
Tarrant	48439100601	3	0.255315
Tarrant	48439100602	3	0.662525
Tarrant	48439100700	3	0.591798
Tarrant	48439100800	3	0.486382
Tarrant	48439100900	3	0.463639
Tarrant	48439101201	3	0.675109

County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439101202	3	0.602873
Tarrant	48439101301	3	0.654808
Tarrant	48439101302	3	0.696504
Tarrant	48439101401	3	0.710086
Tarrant	48439101402	3	0.640059
Tarrant	48439101403	3	0.745024
Tarrant	48439101500	3	0.753767
Tarrant	48439101700	3	0.679244
Tarrant	48439102000	3	0.483963
Tarrant	48439102100	3	0.403334
Tarrant	48439102201	3	0.361908
Tarrant	48439102202	3	0.223345
Tarrant	48439102301	3	0.637652
Tarrant	48439102302	3	0.673757
Tarrant	48439102401	3	0.544486
Tarrant	48439102402	3	0.237535
Tarrant	48439102500	3	0.547294
Tarrant	48439102601	3	0.709423
Tarrant	48439102602	3	0.649064
Tarrant	48439102700	3	0.276805
Tarrant	48439102800	3	0.262359
Tarrant	48439103500	3	0.66594
Tarrant	48439103601	3	0.524363
Tarrant	48439103602	3	0.455385
Tarrant	48439103701	3	0.544976
Tarrant	48439103702	3	0.578383
Tarrant	48439103800	3	0.53905
Tarrant	48439104100	3	0.569013
Tarrant	48439104201	3	0.315377
Tarrant	48439104202	3	0.295129
Tarrant	48439104300	3	0.415372
Tarrant	48439104400	3	0.595766
Tarrant	48439104502	3	0.56549
Tarrant	48439104503	3	0.461577
Tarrant	48439104504	3	0.471127
Tarrant	48439104505	3	0.559427
Tarrant	48439104601	3	0.623832
Tarrant	48439104602	3	0.642122
Tarrant	48439104603	3	0.648243
Tarrant	48439104604	3	0.526218



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County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439104605	3	0.555142
Tarrant	48439104701	3	0.331413
Tarrant	48439104702	3	0.597541
Tarrant	48439104802	3	0.588492
Tarrant	48439104803	3	0.533136
Tarrant	48439104804	3	0.534634
Tarrant	48439104900	3	0.590301
Tarrant	48439105001	3	0.368384
Tarrant	48439105006	3	0.732775
Tarrant	48439105007	3	0.545073
Tarrant	48439105008	3	0.666551
Tarrant	48439105201	3	0.714184
Tarrant	48439105203	3	0.506775
Tarrant	48439105204	3	0.658776
Tarrant	48439105205	3	0.665338
Tarrant	48439105403	3	0.25659
Tarrant	48439105404	3	0.219986
Tarrant	48439105405	3	0.47374
Tarrant	48439105406	3	0.294604
Tarrant	48439105502	3	0.588216
Tarrant	48439105503	3	0.414998
Tarrant	48439105505	3	0.642601
Tarrant	48439105507	3	0.23549
Tarrant	48439105508	3	0.634396
Tarrant	48439105510	3	0.719417
Tarrant	48439105511	3	0.625857
Tarrant	48439105512	3	0.571513
Tarrant	48439105513	3	0.63335
Tarrant	48439105514	3	0.622608
Tarrant	48439105600	3	0.529507
Tarrant	48439105701	3	0.613057
Tarrant	48439105703	3	0.621063
Tarrant	48439105704	3	0.653753
Tarrant	48439105800	3	0.495912
Tarrant	48439105901	3	0.595335
Tarrant	48439105902	3	0.746657
Tarrant	48439106001	3	0.591082
Tarrant	48439106002	3	0.540049
Tarrant	48439106004	3	0.694492
Tarrant	48439106101	3	0.606487

County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439106102	3	0.72075
Tarrant	48439106201	3	0.377946
Tarrant	48439106202	3	0.40893
Tarrant	48439106300	3	0.363372
Tarrant	48439106400	3	0.70735
Tarrant	48439106502	3	0.681979
Tarrant	48439106503	3	0.449633
Tarrant	48439106507	3	0.433109
Tarrant	48439106509	3	0.625203
Tarrant	48439106510	3	0.646089
Tarrant	48439106511	3	0.722729
Tarrant	48439106512	3	0.47202
Tarrant	48439106513	3	0.630187
Tarrant	48439106514	3	0.528776
Tarrant	48439106515	3	0.666574
Tarrant	48439106516	3	0.632338
Tarrant	48439106517	3	0.627936
Tarrant	48439106518	3	0.725292
Tarrant	48439106600	3	0.528588
Tarrant	48439106700	3	0.470798
Tarrant	48439110101	3	0.622185
Tarrant	48439110102	3	0.623465
Tarrant	48439110202	3	0.57202
Tarrant	48439110203	3	0.62446
Tarrant	48439110204	3	0.650171
Tarrant	48439110301	3	0.643574
Tarrant	48439110302	3	0.598602
Tarrant	48439110401	3	0.429848
Tarrant	48439110402	3	0.64731
Tarrant	48439110500	3	0.625344
Tarrant	48439110600	3	0.431818
Tarrant	48439110701	3	0.503893
Tarrant	48439110703	3	0.565197
Tarrant	48439110704	3	0.448474
Tarrant	48439110805	3	0.452615
Tarrant	48439110806	3	0.409065
Tarrant	48439110807	3	0.672268
Tarrant	48439110808	3	0.271347
Tarrant	48439110809	3	0.226154
Tarrant	48439110901	3	0.21293

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County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439110903	3	0.350662
Tarrant	48439110905	3	0.314434
Tarrant	48439110906	3	0.338417
Tarrant	48439110907	3	0.212196
Tarrant	48439111003	3	0.599976
Tarrant	48439111005	3	0.605477
Tarrant	48439111008	3	0.565249
Tarrant	48439111010	3	0.335015
Tarrant	48439111011	3	0.67583
Tarrant	48439111012	3	0.62282
Tarrant	48439111013	3	0.622025
Tarrant	48439111015	3	0.356748
Tarrant	48439111016	3	0.39039
Tarrant	48439111017	3	0.616852
Tarrant	48439111018	3	0.443863
Tarrant	48439111102	3	0.565364
Tarrant	48439111103	3	0.687675
Tarrant	48439111104	3	0.604643
Tarrant	48439111202	3	0.688937
Tarrant	48439111203	3	0.522636
Tarrant	48439111204	3	0.223476
Tarrant	48439111301	3	0.390469
Tarrant	48439111304	3	0.417461
Tarrant	48439111306	3	0.55007
Tarrant	48439111307	3	0.647872
Tarrant	48439111308	3	0.291637
Tarrant	48439111309	3	0.539003
Tarrant	48439111310	3	0.70871
Tarrant	48439111311	3	0.444933
Tarrant	48439111312	3	0.204186
Tarrant	48439111313	3	0.603133
Tarrant	48439111314	3	0.668695
Tarrant	48439111402	3	0.558262
Tarrant	48439111404	3	0.569126
Tarrant	48439111405	3	0.34437
Tarrant	48439111406	3	0.549134
Tarrant	48439111407	3	0.402914
Tarrant	48439111408	3	0.496635
Tarrant	48439111409	3	0.465295
Tarrant	48439111505	3	0.35978

County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439111506	3	0.469819
Tarrant	48439111513	3	0.731295
Tarrant	48439111514	3	0.769172
Tarrant	48439111516	3	0.695937
Tarrant	48439111521	3	0.721204
Tarrant	48439111522	3	0.65978
Tarrant	48439111523	3	0.68449
Tarrant	48439111524	3	0.766187
Tarrant	48439111525	3	0.738872
Tarrant	48439111526	3	0.639441
Tarrant	48439111529	3	0.342638
Tarrant	48439111530	3	0.41407
Tarrant	48439111531	3	0.410631
Tarrant	48439111532	3	0.421116
Tarrant	48439111533	3	0.517546
Tarrant	48439111534	3	0.50822
Tarrant	48439111536	3	0.679462
Tarrant	48439111537	3	0.715757
Tarrant	48439111538	3	0.742179
Tarrant	48439111539	3	0.742401
Tarrant	48439111540	3	0.762852
Tarrant	48439111541	3	0.698577
Tarrant	48439111542	3	0.764487
Tarrant	48439111543	3	0.651207
Tarrant	48439111544	3	0.657569
Tarrant	48439111545	3	0.338829
Tarrant	48439111546	3	0.409942
Tarrant	48439111547	3	0.773617
Tarrant	48439111548	3	0.698574
Tarrant	48439111549	3	0.712959
Tarrant	48439111550	3	0.710515
Tarrant	48439111551	3	0.543679
Tarrant	48439111552	3	0.363097
Tarrant	48439111553	3	0.610602
Tarrant	48439113001	3	0.583928
Tarrant	48439113002	3	0.614003
Tarrant	48439113102	3	0.4581
Tarrant	48439113104	3	0.608215
Tarrant	48439113107	3	0.286819
Tarrant	48439113108	3	0.291621

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County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439113109	3	0.644669
Tarrant	48439113110	3	0.586514
Tarrant	48439113111	3	0.646562
Tarrant	48439113112	3	0.626404
Tarrant	48439113113	3	0.595327
Tarrant	48439113114	3	0.618331
Tarrant	48439113115	3	0.659656
Tarrant	48439113116	3	0.68858
Tarrant	48439113206	3	0.49959
Tarrant	48439113207	3	0.188062
Tarrant	48439113210	3	0.302816
Tarrant	48439113212	3	0.392145
Tarrant	48439113213	3	0.475227
Tarrant	48439113214	3	0.429528
Tarrant	48439113215	3	0.347825
Tarrant	48439113216	3	0.426041
Tarrant	48439113217	3	0.457551
Tarrant	48439113218	3	0.310748
Tarrant	48439113220	3	0.720588
Tarrant	48439113221	3	0.328533
Tarrant	48439113301	3	0.3862
Tarrant	48439113302	3	0.568254
Tarrant	48439113403	3	0.341924
Tarrant	48439113404	3	0.450898
Tarrant	48439113405	3	0.444088
Tarrant	48439113407	3	0.633541
Tarrant	48439113408	3	0.462767
Tarrant	48439113509	3	0.656645
Tarrant	48439113510	3	0.705566
Tarrant	48439113511	3	0.602971
Tarrant	48439113512	3	0.50963
Tarrant	48439113513	3	0.589597
Tarrant	48439113514	3	0.800529
Tarrant	48439113516	3	0.549031
Tarrant	48439113517	3	0.571211
Tarrant	48439113518	3	0.674433
Tarrant	48439113519	3	0.528872
Tarrant	48439113520	3	0.519878
Tarrant	48439113607	3	0.477601
Tarrant	48439113610	3	0.282268

County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439113611	3	0.285485
Tarrant	48439113612	3	0.169959
Tarrant	48439113613	3	0.335106
Tarrant	48439113618	3	0.328703
Tarrant	48439113619	3	0.611759
Tarrant	48439113622	3	0.188645
Tarrant	48439113623	3	0.26919
Tarrant	48439113624	3	0.443919
Tarrant	48439113625	3	0.257688
Tarrant	48439113626	3	0.367493
Tarrant	48439113627	3	0.536887
Tarrant	48439113628	3	0.621991
Tarrant	48439113629	3	0.435757
Tarrant	48439113630	3	0.426474
Tarrant	48439113631	3	0.617448
Tarrant	48439113632	3	0.269086
Tarrant	48439113633	3	0.39053
Tarrant	48439113634	3	0.277038
Tarrant	48439113703	3	0.526575
Tarrant	48439113705	3	0.547474
Tarrant	48439113707	3	0.253021
Tarrant	48439113709	3	0.441036
Tarrant	48439113710	3	0.522376
Tarrant	48439113711	3	0.288125
Tarrant	48439113803	3	0.419635
Tarrant	48439113808	3	0.3613
Tarrant	48439113809	3	0.485043
Tarrant	48439113810	3	0.419157
Tarrant	48439113811	3	0.504272
Tarrant	48439113812	3	0.314608
Tarrant	48439113813	3	0.279937
Tarrant	48439113814	3	0.301175
Tarrant	48439113815	3	0.25993
Tarrant	48439113816	3	0.24109
Tarrant	48439113906	3	0.350393
Tarrant	48439113907	3	0.364231
Tarrant	48439113908	3	0.256295
Tarrant	48439113909	3	0.243974
Tarrant	48439113910	3	0.213782
Tarrant	48439113911	3	0.322618

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County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439113912	3	0.223286
Tarrant	48439113916	3	0.577758
Tarrant	48439113917	3	0.66383
Tarrant	48439113918	3	0.565884
Tarrant	48439113919	3	0.423905
Tarrant	48439113920	3	0.48634
Tarrant	48439113921	3	0.499848
Tarrant	48439113922	3	0.524821
Tarrant	48439113923	3	0.662718
Tarrant	48439113924	3	0.646114
Tarrant	48439113925	3	0.517164
Tarrant	48439113926	3	0.602943
Tarrant	48439113927	3	0.464167
Tarrant	48439113928	3	0.53328
Tarrant	48439113929	3	0.40557
Tarrant	48439114003	3	0.652522
Tarrant	48439114005	3	0.48711
Tarrant	48439114006	3	0.378699
Tarrant	48439114007	3	0.630218
Tarrant	48439114008	3	0.659286
Tarrant	48439114102	3	0.33503
Tarrant	48439114103	3	0.376881
Tarrant	48439114104	3	0.250968
Tarrant	48439114203	3	0.179472
Tarrant	48439114204	3	0.188031
Tarrant	48439114205	3	0.295719
Tarrant	48439114206	3	0.284247
Tarrant	48439114207	3	0.39092
Tarrant	48439121601	3	0.529093
Tarrant	48439121604	3	0.58544
Tarrant	48439121605	3	0.307689
Tarrant	48439121606	3	0.519587
Tarrant	48439121608	3	0.343604
Tarrant	48439121609	3	0.38673
Tarrant	48439121610	3	0.282087
Tarrant	48439121611	3	0.507866
Tarrant	48439121702	3	0.625237
Tarrant	48439121703	3	0.580633
Tarrant	48439121704	3	0.625367
Tarrant	48439121903	3	0.572288

County	Census Tract	TDHCA Region	Diversity Index
Tarrant	48439121904	3	0.501205
Tarrant	48439121905	3	0.676192
Tarrant	48439121906	3	0.600137
Tarrant	48439122001	3	0.377583
Tarrant	48439122002	3	0.55685
Tarrant	48439122100	3	0.42784
Tarrant	48439122200	3	0.544248
Tarrant	48439122300	3	0.722269
Tarrant	48439122400	3	0.68772
Tarrant	48439122500	3	0.362353
Tarrant	48439122600	3	0.417574
Tarrant	48439122700	3	0.592242
Tarrant	48439122801	3	0.652869
Tarrant	48439122802	3	0.608329
Tarrant	48439122900	3	0.531945
Tarrant	48439123000	3	0.458208
Tarrant	48439123100	3	0.594377
Tarrant	48439123200	3	0.641058
Tarrant	48439123300	3	0.47648
Tarrant	48439123400	3	0.570945
Tarrant	48439123500	3	0.625627
Tarrant	48439123600	3	0.748088
Tarrant	48439980000	3	-
Taylor	48441010100	2	0.343512
Taylor	48441010200	2	0.58636
Taylor	48441010300	2	0.701672
Taylor	48441010400	2	0.670714
Taylor	48441010500	2	0.492988
Taylor	48441010600	2	0.513853
Taylor	48441010700	2	0.634097
Taylor	48441010800	2	0.75732
Taylor	48441010900	2	0.469846
Taylor	48441011000	2	0.628048
Taylor	48441011200	2	0.606934
Taylor	48441011300	2	0.691311
Taylor	48441011400	2	0.472558
Taylor	48441011500	2	0.365568
Taylor	48441011600	2	0.430978
Taylor	48441011700	2	0.558852
Taylor	48441011900	2	0.633209

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Taylor	48441012000	2	0.210535
Taylor	48441012100	2	0.369158
Taylor	48441012200	2	0.502333
Taylor	48441012300	2	0.47162
Taylor	48441012400	2	0.253742
Taylor	48441012500	2	0.43221
Taylor	48441012600	2	0.231129
Taylor	48441012700	2	0.360133
Taylor	48441012801	2	0.452078
Taylor	48441012802	2	0.686975
Taylor	48441012900	2	0.538055
Taylor	48441013000	2	0.535982
Taylor	48441013100	2	0.683559
Taylor	48441013200	2	0.335569
Taylor	48441013300	2	0.414675
Taylor	48441013401	2	0.415637
Taylor	48441013402	2	0.37598
Taylor	48441013404	2	0.236694
Taylor	48441013500	2	0.138136
Taylor	48441013600	2	0.234384
Taylor	48441980000	2	-
Terrell	48443950100	12	0.594863
Terry	48445950100	1	0.516984
Terry	48445950300	1	0.55085
Terry	48445950400	1	0.497598
Throckmorton	48447950300	2	0.262424
Titus	48449950100	4	0.450349
Titus	48449950200	4	0.499217
Titus	48449950300	4	0.52624
Titus	48449950400	4	0.356627
Titus	48449950500	4	0.574407
Titus	48449950600	4	0.693943
Titus	48449950700	4	0.693391
Titus	48449950800	4	0.697351
Tom Green	48451000100	12	0.382734
Tom Green	48451000200	12	0.558683
Tom Green	48451000300	12	0.566972
Tom Green	48451000400	12	0.440993
Tom Green	48451000700	12	0.538028
Tom Green	48451000801	12	0.491751

County	Census Tract	TDHCA Region	Diversity Index
Tom Green	48451000802	12	0.496919
Tom Green	48451000900	12	0.559337
Tom Green	48451001000	12	0.337962
Tom Green	48451001101	12	0.474815
Tom Green	48451001102	12	0.503348
Tom Green	48451001200	12	0.618682
Tom Green	48451001301	12	0.498325
Tom Green	48451001303	12	0.570116
Tom Green	48451001304	12	0.45471
Tom Green	48451001400	12	0.527487
Tom Green	48451001500	12	0.466242
Tom Green	48451001600	12	0.377039
Tom Green	48451001702	12	0.385336
Tom Green	48451001704	12	0.30921
Tom Green	48451001706	12	0.426462
Tom Green	48451001707	12	0.370272
Tom Green	48451001708	12	0.315461
Tom Green	48451001800	12	0.647239
Tom Green	48451980000	12	-
Travis	48453000101	7	0.254539
Travis	48453000102	7	0.149785
Travis	48453000203	7	0.45481
Travis	48453000204	7	0.395384
Travis	48453000205	7	0.426234
Travis	48453000206	7	0.332345
Travis	48453000302	7	0.416236
Travis	48453000304	7	0.35435
Travis	48453000305	7	0.361851
Travis	48453000306	7	0.509062
Travis	48453000307	7	0.350662
Travis	48453000401	7	0.471979
Travis	48453000402	7	0.597135
Travis	48453000500	7	0.369894
Travis	48453000601	7	0.593542
Travis	48453000603	7	0.621717
Travis	48453000604	7	0.511308
Travis	48453000700	7	0.377337
Travis	48453000801	7	0.570178
Travis	48453000802	7	0.618752
Travis	48453000803	7	0.571729

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County	Census Tract	TDHCA Region	Diversity Index
Travis	48453000804	7	0.708671
Travis	48453000901	7	0.615076
Travis	48453000902	7	0.595193
Travis	48453001000	7	0.64314
Travis	48453001100	7	0.37147
Travis	48453001200	7	0.366955
Travis	48453001303	7	0.289613
Travis	48453001304	7	0.307471
Travis	48453001305	7	0.393759
Travis	48453001307	7	0.529561
Travis	48453001308	7	0.466914
Travis	48453001401	7	0.270228
Travis	48453001402	7	0.25644
Travis	48453001403	7	0.518
Travis	48453001501	7	0.203476
Travis	48453001503	7	0.529801
Travis	48453001504	7	0.406908
Travis	48453001505	7	0.29679
Travis	48453001602	7	0.509349
Travis	48453001603	7	0.174687
Travis	48453001604	7	0.13474
Travis	48453001605	7	0.219815
Travis	48453001606	7	0.331645
Travis	48453001705	7	0.18064
Travis	48453001706	7	0.394206
Travis	48453001707	7	0.36779
Travis	48453001712	7	0.495204
Travis	48453001713	7	0.552831
Travis	48453001714	7	0.570539
Travis	48453001716	7	0.417881
Travis	48453001718	7	0.319479
Travis	48453001719	7	0.309252
Travis	48453001722	7	0.4753
Travis	48453001728	7	0.508508
Travis	48453001729	7	0.511754
Travis	48453001733	7	0.283522
Travis	48453001737	7	0.422833
Travis	48453001738	7	0.365282
Travis	48453001740	7	0.501388
Travis	48453001741	7	0.351337

County	Census Tract	TDHCA Region	Diversity Index
Travis	48453001742	7	0.432695
Travis	48453001745	7	0.372516
Travis	48453001746	7	0.492066
Travis	48453001747	7	0.554827
Travis	48453001748	7	0.521711
Travis	48453001749	7	0.536015
Travis	48453001750	7	0.489433
Travis	48453001751	7	0.294312
Travis	48453001752	7	0.564359
Travis	48453001753	7	0.563874
Travis	48453001754	7	0.314729
Travis	48453001755	7	0.512692
Travis	48453001756	7	0.397972
Travis	48453001757	7	0.3956
Travis	48453001760	7	0.366564
Travis	48453001761	7	0.290515
Travis	48453001764	7	0.25561
Travis	48453001765	7	0.332942
Travis	48453001766	7	0.284609
Travis	48453001768	7	0.255575
Travis	48453001769	7	0.400166
Travis	48453001770	7	0.361848
Travis	48453001771	7	0.313064
Travis	48453001772	7	0.595457
Travis	48453001773	7	0.315608
Travis	48453001774	7	0.572273
Travis	48453001775	7	0.468885
Travis	48453001776	7	0.59398
Travis	48453001777	7	0.513715
Travis	48453001778	7	0.144546
Travis	48453001779	7	0.290089
Travis	48453001780	7	0.253983
Travis	48453001781	7	0.246531
Travis	48453001782	7	0.548555
Travis	48453001783	7	0.283349
Travis	48453001784	7	0.362275
Travis	48453001785	7	0.613296
Travis	48453001786	7	0.59753
Travis	48453001804	7	0.703146
Travis	48453001805	7	0.693594

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County	Census Tract	TDHCA Region	Diversity Index
Travis	48453001806	7	0.625829
Travis	48453001811	7	0.69955
Travis	48453001812	7	0.605222
Travis	48453001813	7	0.685737
Travis	48453001817	7	0.354476
Travis	48453001818	7	0.628686
Travis	48453001819	7	0.681758
Travis	48453001820	7	0.674922
Travis	48453001821	7	0.679638
Travis	48453001822	7	0.594381
Travis	48453001823	7	0.687476
Travis	48453001824	7	0.491719
Travis	48453001826	7	0.692719
Travis	48453001828	7	0.362105
Travis	48453001829	7	0.492006
Travis	48453001832	7	0.595227
Travis	48453001833	7	0.690758
Travis	48453001834	7	0.793894
Travis	48453001835	7	0.636512
Travis	48453001839	7	0.723267
Travis	48453001840	7	0.73133
Travis	48453001841	7	0.706675
Travis	48453001842	7	0.664724
Travis	48453001843	7	0.619221
Travis	48453001844	7	0.570181
Travis	48453001845	7	0.432041
Travis	48453001846	7	0.297392
Travis	48453001847	7	0.683468
Travis	48453001848	7	0.672035
Travis	48453001849	7	0.663117
Travis	48453001850	7	0.603272
Travis	48453001851	7	0.661921
Travis	48453001853	7	0.455233
Travis	48453001854	7	0.709026
Travis	48453001855	7	0.624417
Travis	48453001856	7	0.71806
Travis	48453001857	7	0.714275
Travis	48453001858	7	0.579801
Travis	48453001859	7	0.612107
Travis	48453001860	7	0.657712

County	Census Tract	TDHCA Region	Diversity Index
Travis	48453001861	7	0.700321
Travis	48453001862	7	0.729477
Travis	48453001863	7	0.73101
Travis	48453001864	7	0.658635
Travis	48453001901	7	0.291288
Travis	48453001908	7	0.427278
Travis	48453001910	7	0.298057
Travis	48453001911	7	0.435361
Travis	48453001912	7	0.313864
Travis	48453001913	7	0.397232
Travis	48453001914	7	0.365405
Travis	48453001915	7	0.371743
Travis	48453001916	7	0.259742
Travis	48453001917	7	0.318753
Travis	48453001918	7	0.262729
Travis	48453001919	7	0.251248
Travis	48453002002	7	0.496471
Travis	48453002003	7	0.529672
Travis	48453002004	7	0.522311
Travis	48453002005	7	0.498877
Travis	48453002104	7	0.635317
Travis	48453002105	7	0.717048
Travis	48453002106	7	0.57838
Travis	48453002107	7	0.648987
Travis	48453002108	7	0.606679
Travis	48453002109	7	0.612524
Travis	48453002110	7	0.73986
Travis	48453002111	7	0.657845
Travis	48453002112	7	0.691021
Travis	48453002113	7	0.625039
Travis	48453002201	7	0.606738
Travis	48453002202	7	0.59184
Travis	48453002207	7	0.67353
Travis	48453002208	7	0.570433
Travis	48453002209	7	0.712276
Travis	48453002210	7	0.548472
Travis	48453002211	7	0.688676
Travis	48453002212	7	0.621994
Travis	48453002304	7	0.548582
Travis	48453002307	7	0.627608

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County	Census Tract	TDHCA Region	Diversity Index
Travis	48453002308	7	0.540975
Travis	48453002310	7	0.516367
Travis	48453002312	7	0.487259
Travis	48453002313	7	0.663526
Travis	48453002314	7	0.692679
Travis	48453002315	7	0.564362
Travis	48453002316	7	0.636715
Travis	48453002317	7	0.712632
Travis	48453002318	7	0.671036
Travis	48453002319	7	0.660158
Travis	48453002402	7	0.562104
Travis	48453002403	7	0.530911
Travis	48453002407	7	0.554087
Travis	48453002409	7	0.506413
Travis	48453002410	7	0.557241
Travis	48453002411	7	0.556907
Travis	48453002412	7	0.469944
Travis	48453002413	7	0.592641
Travis	48453002419	7	0.695843
Travis	48453002421	7	0.589775
Travis	48453002422	7	0.547158
Travis	48453002423	7	0.525942
Travis	48453002424	7	0.499366
Travis	48453002425	7	0.592873
Travis	48453002426	7	0.569917
Travis	48453002427	7	0.413003
Travis	48453002428	7	0.538094
Travis	48453002429	7	0.620566
Travis	48453002430	7	0.425164
Travis	48453002431	7	0.579712
Travis	48453002432	7	0.59742
Travis	48453002433	7	0.702398
Travis	48453002434	7	0.592474
Travis	48453002435	7	0.609607
Travis	48453002436	7	0.43465
Travis	48453002500	7	0.404303
Travis	48453980000	7	-
Trinity	48455950100	5	0.269019
Trinity	48455950200	5	0.259862
Trinity	48455950300	5	0.119132

County	Census Tract	TDHCA Region	Diversity Index
Trinity	48455950400	5	0.17766
Trinity	48455950500	5	0.581923
Tyler	48457950100	5	0.088598
Tyler	48457950200	5	0.478753
Tyler	48457950300	5	0.345105
Tyler	48457950400	5	0.070888
Tyler	48457950500	5	0.213432
Upshur	48459950100	4	0.20965
Upshur	48459950200	4	0.281181
Upshur	48459950300	4	0.29712
Upshur	48459950400	4	0.488051
Upshur	48459950500	4	0.250505
Upshur	48459950600	4	0.25732
Upshur	48459950700	4	0.215422
Upton	48461950100	12	0.44395
Upton	48461950200	12	0.54967
Uvalde	48463950100	11	0.413686
Uvalde	48463950200	11	0.516861
Uvalde	48463950300	11	0.529837
Uvalde	48463950400	11	0.428064
Uvalde	48463950500	11	0.197087
Val Verde	48465950201	11	0.45014
Val Verde	48465950301	11	0.216828
Val Verde	48465950302	11	0.170183
Val Verde	48465950400	11	0.30014
Val Verde	48465950500	11	0.413207
Val Verde	48465950601	11	0.128702
Val Verde	48465950602	11	0.100468
Val Verde	48465950700	11	0.24469
Val Verde	48465950800	11	0.434035
Val Verde	48465980000	11	-
Van Zandt	48467950100	4	0.142132
Van Zandt	48467950200	4	0.394148
Van Zandt	48467950300	4	0.201677
Van Zandt	48467950400	4	0.214875
Van Zandt	48467950500	4	0.24875
Van Zandt	48467950600	4	0.171274
Van Zandt	48467950700	4	0.23106
Van Zandt	48467950800	4	0.289058
Van Zandt	48467950900	4	0.244627



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County	Census Tract	TDHCA Region	Diversity Index
Van Zandt	48467951000	4	0.148432
Victoria	48469000100	10	0.478374
Victoria	48469000201	10	0.403089
Victoria	48469000202	10	0.500636
Victoria	48469000301	10	0.461777
Victoria	48469000302	10	0.433536
Victoria	48469000400	10	0.457247
Victoria	48469000501	10	0.500624
Victoria	48469000502	10	0.52317
Victoria	48469000601	10	0.512504
Victoria	48469000602	10	0.56061
Victoria	48469000700	10	0.521792
Victoria	48469000800	10	0.463814
Victoria	48469001300	10	0.417127
Victoria	48469001400	10	0.380517
Victoria	48469001501	10	0.391434
Victoria	48469001503	10	0.448858
Victoria	48469001504	10	0.304573
Victoria	48469001601	10	0.507493
Victoria	48469001604	10	0.609447
Victoria	48469001605	10	0.527855
Victoria	48469001606	10	0.41084
Victoria	48469001700	10	0.538426
Victoria	48469980000	10	-
Walker	48471790101	6	0.526819
Walker	48471790102	6	0.474009
Walker	48471790103	6	0.505815
Walker	48471790200	6	0.418355
Walker	48471790300	6	0.267772
Walker	48471790400	6	0.553348
Walker	48471790500	6	0.522934
Walker	48471790600	6	0.593862
Walker	48471790700	6	0.602576
Walker	48471790800	6	0.500966
Waller	48473680100	6	0.438217
Waller	48473680200	6	0.660156
Waller	48473680300	6	0.623928
Waller	48473680400	6	0.358796
Waller	48473680500	6	0.644909
Waller	48473680600	6	0.349067

County	Census Tract	TDHCA Region	Diversity Index
Ward	48475950100	12	0.499441
Ward	48475950200	12	0.571355
Ward	48475950300	12	0.666956
Washington	48477170100	8	0.559568
Washington	48477170200	8	0.431377
Washington	48477170300	8	0.443296
Washington	48477170400	8	0.523595
Washington	48477170500	8	0.338952
Washington	48477170600	8	0.514285
Webb	48479000101	11	0.1209
Webb	48479000105	11	0.129863
Webb	48479000106	11	0.08862
Webb	48479000107	11	0.111043
Webb	48479000108	11	0.058078
Webb	48479000109	11	0.165479
Webb	48479000200	11	0.071761
Webb	48479000300	11	0.069645
Webb	48479000601	11	0.107223
Webb	48479000602	11	0.110466
Webb	48479000700	11	0.087737
Webb	48479000800	11	0.065214
Webb	48479000901	11	0.064831
Webb	48479000903	11	0.066981
Webb	48479000904	11	0.115513
Webb	48479001001	11	0.092093
Webb	48479001003	11	0.122983
Webb	48479001004	11	0.086249
Webb	48479001101	11	0.15239
Webb	48479001103	11	0.077153
Webb	48479001104	11	0.038985
Webb	48479001105	11	0.130918
Webb	48479001201	11	0.07214
Webb	48479001202	11	0.084566
Webb	48479001300	11	0.072699
Webb	48479001401	11	0.132708
Webb	48479001402	11	0.044431
Webb	48479001501	11	0.077623
Webb	48479001502	11	0.100639
Webb	48479001601	11	0.071899
Webb	48479001602	11	0.266979

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Webb	48479001706	11	0.070156
Webb	48479001709	11	0.217592
Webb	48479001710	11	0.076428
Webb	48479001711	11	0.270656
Webb	48479001712	11	0.152482
Webb	48479001713	11	0.211284
Webb	48479001714	11	0.224547
Webb	48479001715	11	0.150189
Webb	48479001716	11	0.093249
Webb	48479001717	11	0.239822
Webb	48479001718	11	0.164747
Webb	48479001719	11	0.175965
Webb	48479001720	11	0.190454
Webb	48479001721	11	0.156209
Webb	48479001722	11	0.256069
Webb	48479001806	11	0.109386
Webb	48479001807	11	0.108662
Webb	48479001808	11	0.1293
Webb	48479001809	11	0.170868
Webb	48479001810	11	0.033617
Webb	48479001811	11	0.1076
Webb	48479001812	11	0.1377
Webb	48479001813	11	0.063052
Webb	48479001814	11	0.043116
Webb	48479001815	11	0.097506
Webb	48479001816	11	0.091596
Webb	48479001817	11	0.14648
Webb	48479001818	11	0.146248
Webb	48479001900	11	0.143436
Webb	48479980000	11	-
Wharton	48481740100	6	0.500693
Wharton	48481740200	6	0.579369
Wharton	48481740300	6	0.603761
Wharton	48481740400	6	0.601575
Wharton	48481740500	6	0.629415
Wharton	48481740600	6	0.570658
Wharton	48481740700	6	0.622044
Wharton	48481740800	6	0.546311
Wharton	48481740900	6	0.409236
Wharton	48481741000	6	0.538307

County	Census Tract	TDHCA Region	Diversity Index
Wharton	48481741100	6	0.308919
Wheeler	48483950100	1	0.406107
Wheeler	48483950300	1	0.429579
Wichita	48485010100	2	0.688444
Wichita	48485010200	2	0.402601
Wichita	48485010400	2	0.450591
Wichita	48485010600	2	0.564712
Wichita	48485010700	2	0.600266
Wichita	48485010800	2	0.707821
Wichita	48485010900	2	0.263851
Wichita	48485011000	2	0.55205
Wichita	48485011100	2	0.675973
Wichita	48485011200	2	0.540907
Wichita	48485011300	2	0.599703
Wichita	48485011400	2	0.578192
Wichita	48485011500	2	0.522167
Wichita	48485011600	2	0.502707
Wichita	48485011700	2	0.123768
Wichita	48485011800	2	0.348564
Wichita	48485011900	2	0.288734
Wichita	48485012000	2	0.460007
Wichita	48485012100	2	0.449167
Wichita	48485012200	2	0.340452
Wichita	48485012300	2	0.416053
Wichita	48485012400	2	0.294142
Wichita	48485012600	2	0.298265
Wichita	48485012700	2	0.553692
Wichita	48485012800	2	0.368426
Wichita	48485012900	2	0.219504
Wichita	48485013000	2	0.454562
Wichita	48485013100	2	0.639139
Wichita	48485013200	2	0.592801
Wichita	48485013300	2	0.601505
Wichita	48485013401	2	0.517697
Wichita	48485013501	2	0.256494
Wichita	48485013502	2	0.306647
Wichita	48485013600	2	0.134988
Wichita	48485013700	2	0.224079
Wichita	48485013800	2	0.083225
Wichita	48485980000	2	-

Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Wilbarger	48487950300	2	0.222918
Wilbarger	48487950500	2	0.581464
Wilbarger	48487950600	2	0.48165
Wilbarger	48487950700	2	0.529313
Willacy	48489950300	11	0.208809
Willacy	48489950400	11	0.254369
Willacy	48489950500	11	0.181908
Willacy	48489950600	11	0.101727
Willacy	48489950700	11	0.265256
Willacy	48489990000	11	-
Williamson	48491020105	7	0.065952
Williamson	48491020106	7	0.239734
Williamson	48491020107	7	0.081956
Williamson	48491020108	7	0.210878
Williamson	48491020109	7	0.151676
Williamson	48491020110	7	0.198378
Williamson	48491020111	7	0.367584
Williamson	48491020112	7	0.230789
Williamson	48491020113	7	0.425526
Williamson	48491020114	7	0.386196
Williamson	48491020115	7	0.240398
Williamson	48491020201	7	0.30379
Williamson	48491020202	7	0.170247
Williamson	48491020203	7	0.054202
Williamson	48491020204	7	0.348204
Williamson	48491020301	7	0.326953
Williamson	48491020302	7	0.371435
Williamson	48491020310	7	0.317527
Williamson	48491020311	7	0.612623
Williamson	48491020312	7	0.49637
Williamson	48491020313	7	0.471545
Williamson	48491020314	7	0.504818
Williamson	48491020315	7	0.585327
Williamson	48491020316	7	0.432367
Williamson	48491020317	7	0.59371
Williamson	48491020318	7	0.405647
Williamson	48491020319	7	0.480224
Williamson	48491020320	7	0.394236
Williamson	48491020321	7	0.463212
Williamson	48491020322	7	0.379021

County	Census Tract	TDHCA Region	Diversity Index
Williamson	48491020323	7	0.53648
Williamson	48491020324	7	0.463894
Williamson	48491020325	7	0.58891
Williamson	48491020326	7	0.302078
Williamson	48491020327	7	0.464604
Williamson	48491020328	7	0.447642
Williamson	48491020403	7	0.376809
Williamson	48491020404	7	0.396711
Williamson	48491020405	7	0.548407
Williamson	48491020406	7	0.598188
Williamson	48491020408	7	0.46722
Williamson	48491020409	7	0.570422
Williamson	48491020410	7	0.477311
Williamson	48491020411	7	0.52026
Williamson	48491020503	7	0.380818
Williamson	48491020504	7	0.679658
Williamson	48491020505	7	0.441848
Williamson	48491020506	7	0.472359
Williamson	48491020507	7	0.529388
Williamson	48491020508	7	0.48119
Williamson	48491020509	7	0.438709
Williamson	48491020510	7	0.553512
Williamson	48491020602	7	0.588916
Williamson	48491020603	7	0.461044
Williamson	48491020604	7	0.330204
Williamson	48491020605	7	0.484019
Williamson	48491020701	7	0.582528
Williamson	48491020703	7	0.662374
Williamson	48491020704	7	0.543653
Williamson	48491020706	7	0.458359
Williamson	48491020707	7	0.642906
Williamson	48491020708	7	0.60949
Williamson	48491020803	7	0.455705
Williamson	48491020804	7	0.427418
Williamson	48491020805	7	0.48647
Williamson	48491020806	7	0.627614
Williamson	48491020807	7	0.644399
Williamson	48491020808	7	0.554338
Williamson	48491020809	7	0.577916
Williamson	48491020900	7	0.2946

## Diversity Index

County	Census Tract	TDHCA Region	Diversity Index
Williamson	48491021000	7	0.60568
Williamson	48491021100	7	0.578247
Williamson	48491021201	7	0.512181
Williamson	48491021202	7	0.535421
Williamson	48491021203	7	0.628991
Williamson	48491021300	7	0.494343
Williamson	48491021401	7	0.465612
Williamson	48491021402	7	0.547724
Williamson	48491021403	7	0.526047
Williamson	48491021502	7	0.686127
Williamson	48491021503	7	0.592105
Williamson	48491021504	7	0.579383
Williamson	48491021505	7	0.64978
Williamson	48491021506	7	0.64639
Williamson	48491021507	7	0.683581
Williamson	48491021508	7	0.560236
Williamson	48491021601	7	0.429942
Williamson	48491021602	7	0.40504
Williamson	48491021603	7	0.439181
Wilson	48493000102	9	0.407478
Wilson	48493000103	9	0.358031
Wilson	48493000104	9	0.259303
Wilson	48493000201	9	0.487455
Wilson	48493000202	9	0.425366
Wilson	48493000300	9	0.45653
Wilson	48493000402	9	0.514363
Wilson	48493000403	9	0.435468
Wilson	48493000404	9	0.468411
Wilson	48493000500	9	0.369928
Wilson	48493000600	9	0.438138
Winkler	48495950200	12	0.528716
Winkler	48495950300	12	0.515148
Winkler	48495950400	12	0.466945
Wise	48497150101	3	0.177517

County	Census Tract	TDHCA Region	Diversity Index
Wise	48497150102	3	0.243016
Wise	48497150200	3	0.415487
Wise	48497150300	3	0.120763
Wise	48497150401	3	0.304327
Wise	48497150402	3	0.198444
Wise	48497150403	3	0.215296
Wise	48497150500	3	0.457803
Wise	48497150601	3	0.147609
Wise	48497150602	3	0.355164
Wise	48497150603	3	0.362707
Wood	48499950100	4	0.137257
Wood	48499950200	4	0.42123
Wood	48499950301	4	0.104904
Wood	48499950302	4	0.171068
Wood	48499950400	4	0.186228
Wood	48499950500	4	0.217343
Wood	48499950601	4	0.361358
Wood	48499950602	4	0.11019
Wood	48499950700	4	0.198658
Wood	48499950800	4	0.480333
Yoakum	48501950100	1	0.451236
Yoakum	48501950200	1	0.421986
Young	48503950200	2	0.349201
Young	48503950400	2	0.148134
Young	48503950500	2	0.448872
Young	48503950600	2	0.295211
Zapata	48505950301	11	0.015393
Zapata	48505950302	11	0.288059
Zapata	48505950400	11	0.167429
Zavala	48507950100	11	0.112403
Zavala	48507950200	11	0.296171
Zavala	48507950301	11	0.366421
Zavala	48507950302	11	0.1827

Note: Blank cells represent Census Tracts for which not enough data exist to calculate a Diversity Index value.

## Appendix F - Program and Portfolio Analysis County Supplement

**Figure F-1: Percent of 2017 Individual Residents in Active Multifamily Properties Participating in TDHCA Programs and Texas Individuals at or Below 200% Poverty in Counties with 30 or more Individual Renters in Active Multifamily Properties Participating in TDHCA Programs by Ethnicity**

County	Hispanic or Latino MF Portfolio Residents	Not Hispanic or Latino MF Portfolio Residents	Unreported Ethnicity MF Portfolio Residents	Total MF Portfolio Residents	Hispanic or Latino Texas Individuals	Not Hispanic or Latino Texas Individuals	Total Texas Individuals
Anderson	13.4%	84.7%	1.9%	1,092	23.5%	77.3%	20,612
Angelina	8.7%	91.1%	0.2%	1,432	29.8%	71.0%	37,444
Aransas	46.8%	52.9%	0.3%	357	37.4%	68.1%	9,517
Atascosa	56.1%	41.2%	2.7%	221	75.4%	25.8%	17,156
Austin	33.3%	66.7%	0.0%	327	37.0%	63.0%	9,004
Bandera	29.9%	68.2%	1.9%	157	24.3%	88.2%	5,310
Bastrop	29.6%	65.7%	4.7%	679	56.3%	44.9%	25,837
Bee	74.4%	25.6%	0.0%	219	72.0%	30.2%	11,910
Bell	21.6%	71.9%	6.5%	3,102	29.2%	70.8%	118,814
Bexar	65.2%	25.1%	9.7%	40,789	72.8%	27.2%	707,680
Blanco	18.5%	59.1%	22.4%	254	35.2%	74.8%	3,036
Bosque	11.2%	88.8%	0.0%	107	26.0%	76.7%	6,606
Bowie	1.6%	98.1%	0.2%	1,700	8.5%	91.5%	36,507
Brazoria	28.6%	61.1%	10.3%	4,724	49.1%	50.9%	84,283
Brazos	17.4%	74.7%	7.9%	2,080	31.2%	68.9%	91,617
Brewster	51.8%	46.3%	1.8%	164	58.2%	49.6%	3,710
Brown	18.7%	63.7%	17.6%	862	27.2%	73.7%	15,309
Burleson	6.7%	93.3%	0.0%	75	21.9%	81.5%	5,619
Burnet	25.4%	69.2%	5.4%	1,021	35.7%	68.2%	15,490
Caldwell	55.3%	37.5%	7.2%	624	60.7%	40.0%	17,603
Calhoun	59.1%	40.9%	0.0%	684	66.2%	35.3%	7,871
Callahan	7.9%	92.1%	0.0%	38	10.5%	96.9%	4,878
Cameron	92.5%	3.3%	4.1%	11,171	93.8%	6.2%	249,935
Camp	17.3%	82.7%	0.0%	179	33.0%	71.4%	5,548
Cass	0.0%	100.0%	0.0%	69	6.8%	98.6%	12,595
Chambers	3.0%	97.0%	0.0%	33	39.2%	65.5%	9,862
Cherokee	9.3%	89.8%	1.0%	800	32.3%	68.6%	23,286
Childress	20.8%	79.2%	0.0%	120	31.5%	82.7%	2,298
Coleman	21.6%	78.4%	0.0%	37	25.2%	81.4%	4,071

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County	Hispanic or Latino MF Portfolio Residents	Not Hispanic or Latino MF Portfolio Residents	Unreported Ethnicity MF Portfolio Residents	Total MF Portfolio Residents	Hispanic or Latino Texas Individuals	Not Hispanic or Latino Texas Individuals	Total Texas Individuals
Collin	25.3%	63.5%	11.2%	7,814	33.3%	66.7%	159,327
Colorado	35.5%	63.3%	1.2%	248	44.2%	57.4%	7,291
Comal	51.4%	32.2%	16.4%	438	41.1%	59.0%	30,159
Comanche	25.9%	73.3%	0.7%	135	41.7%	61.6%	5,847
Cooke	12.2%	81.8%	6.0%	468	32.2%	71.0%	12,882
Coryell	22.6%	71.9%	5.5%	922	21.4%	78.6%	24,701
Crockett	70.1%	29.9%	0.0%	67	72.4%	27.6%	811
Dallam	53.4%	46.6%	0.0%	193	56.7%	58.5%	2,698
Dallas	26.9%	67.5%	5.6%	56,858	55.0%	45.0%	1,066,652
Deaf Smith	91.8%	8.2%	0.0%	720	93.2%	16.5%	8,207
Denton	24.2%	65.9%	9.8%	10,382	35.3%	64.9%	163,541
DeWitt	0.0%	0.7%	99.3%	134	49.3%	55.7%	6,478
Dimmit	95.5%	4.5%	0.0%	314	96.5%	8.4%	5,379
Duval	97.6%	2.4%	0.0%	82	93.9%	8.5%	5,436
Eastland	11.0%	89.0%	0.0%	164	24.1%	82.2%	8,095
Ector	73.6%	24.7%	1.7%	2,047	68.0%	32.0%	49,238
Ellis	18.8%	67.1%	14.0%	2,998	44.0%	56.0%	48,205
El Paso	91.6%	4.7%	3.8%	18,122	88.8%	11.2%	412,299
Erath	18.1%	81.9%	0.0%	288	32.2%	70.2%	17,693
Falls	2.8%	97.2%	0.0%	72	33.3%	67.0%	6,965
Fannin	5.6%	92.7%	1.6%	124	16.4%	84.7%	11,968
Fayette	24.3%	75.7%	0.0%	74	30.4%	71.3%	7,712
Fort Bend	28.1%	68.1%	3.9%	4,124	43.8%	56.2%	136,498
Franklin	4.6%	63.6%	31.8%	283	24.8%	95.7%	3,688
Freestone	8.2%	88.0%	3.8%	158	24.3%	81.8%	6,230
Frio	94.1%	5.2%	0.7%	555	90.2%	10.5%	7,873
Gaines	50.0%	26.3%	23.8%	160	45.3%	59.5%	6,393
Galveston	14.0%	69.7%	16.3%	6,057	36.4%	63.6%	88,893
Gillespie	29.0%	63.7%	7.3%	575	44.9%	60.5%	7,974
Goliad	63.6%	22.7%	13.6%	66	60.6%	49.7%	2,204
Gonzales	45.0%	34.2%	20.8%	260	61.2%	39.1%	9,173
Gray	17.9%	82.1%	0.0%	329	39.9%	62.3%	8,057
Grayson	6.5%	74.5%	19.0%	1,326	20.9%	79.1%	44,351
Gregg	7.2%	85.7%	7.1%	1,806	25.9%	74.9%	49,796
Grimes	12.7%	86.3%	1.0%	299	28.4%	73.9%	9,689
Guadalupe	49.6%	46.8%	3.6%	1,323	53.7%	46.5%	39,451

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County	Hispanic or Latino MF Portfolio Residents	Not Hispanic or Latino MF Portfolio Residents	Unreported Ethnicity MF Portfolio Residents	Total MF Portfolio Residents	Hispanic or Latino Texas Individuals	Not Hispanic or Latino Texas Individuals	Total Texas Individuals
Hale	72.7%	24.0%	3.2%	462	72.4%	29.3%	15,412
Hardin	1.0%	79.4%	19.6%	398	4.4%	97.2%	16,781
Harris	32.6%	62.0%	5.4%	93,779	57.4%	42.6%	1,687,329
Harrison	2.9%	60.8%	36.3%	612	20.2%	80.6%	24,930
Hays	38.9%	42.8%	18.2%	4,837	50.7%	49.5%	57,769
Hemphill	45.9%	54.1%	0.0%	61	74.3%	52.3%	1,067
Henderson	6.6%	93.1%	0.3%	868	21.5%	80.1%	32,596
Hidalgo	96.6%	1.2%	2.2%	14,947	96.2%	3.8%	493,192
Hill	14.4%	85.6%	0.0%	411	27.2%	74.2%	14,687
Hockley	62.1%	35.2%	2.7%	298	56.8%	45.6%	8,364
Hood	4.0%	96.0%	0.0%	125	26.7%	87.4%	14,674
Hopkins	9.3%	90.7%	0.0%	321	26.6%	74.4%	14,704
Houston	1.9%	97.8%	0.4%	267	14.4%	86.1%	9,230
Howard	60.5%	30.3%	9.1%	702	49.4%	52.8%	10,880
Hunt	8.7%	90.7%	0.6%	1,132	21.8%	79.2%	33,744
Hutchinson	18.4%	59.4%	22.2%	261	31.7%	70.7%	8,118
Jack	13.8%	86.2%	0.0%	123	23.1%	77.8%	2,906
Jackson	48.8%	51.2%	0.0%	82	50.2%	52.5%	4,364
Jasper	1.1%	98.9%	0.0%	364	10.4%	95.8%	13,008
Jefferson	5.0%	87.7%	7.3%	7,895	23.6%	76.5%	98,173
Jim Wells	91.5%	7.9%	0.7%	457	88.4%	14.0%	17,513
Johnson	19.4%	76.2%	4.4%	2,805	31.7%	68.8%	47,415
Karnes	56.4%	22.9%	20.7%	266	69.0%	32.8%	5,320
Kaufman	11.1%	88.3%	0.6%	2,093	31.7%	69.4%	34,230
Kendall	24.0%	64.1%	11.9%	621	52.7%	69.4%	6,698
Kerr	26.1%	57.6%	16.2%	677	37.6%	63.5%	19,015
Kinney	40.6%	59.4%	0.0%	32	61.3%	41.7%	1,433
Kleberg	88.6%	11.3%	0.1%	1,033	81.7%	23.4%	14,126
Lamar	2.6%	87.1%	10.4%	541	11.8%	90.2%	20,466
Lamb	65.0%	35.0%	0.0%	120	70.3%	32.3%	6,786
Lampasas	22.2%	77.8%	0.0%	239	32.4%	80.5%	5,917
La Salle	89.3%	10.7%	0.0%	196	92.6%	8.1%	3,617
Lavaca	54.8%	45.2%	0.0%	135	30.7%	73.6%	5,894
Lee	35.1%	64.9%	0.0%	245	37.6%	64.3%	5,520
Leon	22.2%	77.8%	0.0%	36	25.0%	78.0%	5,873
Liberty	6.1%	92.8%	1.1%	982	28.8%	72.2%	28,057

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County	Hispanic or Latino MF Portfolio Residents	Not Hispanic or Latino MF Portfolio Residents	Unreported Ethnicity MF Portfolio Residents	Total MF Portfolio Residents	Hispanic or Latino Texas Individuals	Not Hispanic or Latino Texas Individuals	Total Texas Individuals
Limestone	13.6%	86.4%	0.0%	381	27.7%	75.0%	10,337
Live Oak	42.7%	31.5%	25.9%	143	42.8%	57.8%	3,342
Llano	6.3%	93.1%	0.6%	510	13.8%	90.8%	6,367
Lubbock	28.0%	40.3%	31.7%	4,800	46.0%	54.1%	114,751
McCulloch	28.6%	71.4%	0.0%	105	50.7%	73.7%	3,003
McLennan	15.6%	78.2%	6.2%	2,545	36.3%	63.7%	102,707
Madison	7.9%	90.4%	1.8%	114	21.8%	78.7%	3,929
Marion	0.0%	100.0%	0.0%	48	0.0%	104.5%	4,605
Matagorda	49.3%	50.5%	0.2%	422	52.1%	50.1%	15,193
Maverick	99.8%	0.1%	0.1%	932	98.1%	2.9%	32,545
Medina	76.5%	14.2%	9.3%	506	66.7%	34.1%	13,594
Midland	42.8%	33.6%	23.6%	2,342	55.6%	44.7%	37,045
Milam	22.4%	77.6%	0.0%	393	37.7%	64.4%	9,964
Mitchell	29.0%	70.2%	0.8%	124	51.2%	51.4%	1,730
Montague	6.5%	93.5%	0.0%	276	18.7%	88.9%	7,312
Montgomery	26.8%	59.5%	13.7%	7,555	41.4%	58.6%	140,631
Moore	64.5%	27.1%	8.4%	166	69.7%	35.5%	9,142
Morris	3.0%	97.0%	0.0%	67	16.8%	87.2%	4,928
Nacogdoches	6.4%	82.3%	11.3%	1,664	27.9%	72.6%	27,860
Navarro	10.1%	88.2%	1.7%	287	36.0%	65.5%	21,567
Newton	0.0%	97.4%	2.6%	39	0.0%	103.1%	5,350
Nolan	44.9%	51.5%	3.5%	198	49.5%	62.6%	6,050
Nueces	77.3%	20.1%	2.7%	7,018	74.4%	25.6%	135,728
Ochiltree	55.8%	44.2%	0.0%	77	62.6%	45.4%	3,503
Orange	2.6%	70.9%	26.5%	1,706	8.7%	92.1%	28,588
Palo Pinto	18.7%	81.0%	0.3%	364	27.3%	74.9%	12,292
Panola	0.7%	98.5%	0.7%	134	17.4%	84.7%	8,303
Parker	14.1%	85.4%	0.5%	1,168	18.3%	81.8%	29,182
Pecos	67.8%	7.7%	24.5%	363	79.9%	21.3%	4,361
Polk	1.5%	98.5%	0.0%	131	16.9%	83.7%	18,164
Potter	22.9%	51.5%	25.6%	4,180	48.9%	51.3%	55,789
Presidio	77.1%	8.6%	14.3%	105	91.6%	14.2%	3,939
Rains	6.4%	93.6%	0.0%	125	17.0%	98.9%	3,092
Randall	36.9%	59.3%	3.8%	477	29.6%	70.4%	31,982
Red River	3.0%	97.0%	0.0%	135	11.9%	90.0%	6,304
Reeves	88.9%	9.9%	1.2%	253	83.3%	21.2%	4,568



Program and Portfolio Analysis County Supplement

County	Hispanic or Latino MF Portfolio Residents	Not Hispanic or Latino MF Portfolio Residents	Unreported Ethnicity MF Portfolio Residents	Total MF Portfolio Residents	Hispanic or Latino Texas Individuals	Not Hispanic or Latino Texas Individuals	Total Texas Individuals
Refugio	0.0%	0.0%	100.0%	81	72.0%	36.6%	2,587
Robertson	16.7%	83.3%	0.0%	30	25.8%	77.2%	5,997
Rockwall	5.7%	94.3%	0.0%	212	31.9%	68.2%	16,733
Rusk	18.5%	81.5%	0.0%	222	23.4%	77.7%	18,879
Sabine	0.0%	100.0%	0.0%	49	0.0%	101.3%	5,202
San Augustine	5.6%	94.4%	0.0%	36	0.0%	104.8%	4,496
San Jacinto	5.2%	94.3%	0.5%	210	12.6%	92.7%	11,295
San Patricio	52.1%	12.4%	35.5%	955	69.1%	31.6%	23,909
Schleicher	82.5%	15.0%	2.5%	40	50.6%	51.1%	982
Scurry	52.7%	46.1%	1.2%	167	55.4%	45.5%	5,191
Shackelford	12.2%	43.2%	44.6%	74	19.3%	82.1%	1,139
Shelby	5.3%	94.7%	0.0%	243	30.9%	74.9%	12,585
Smith	8.5%	80.6%	10.9%	3,724	30.6%	70.0%	84,271
Starr	96.5%	3.2%	0.3%	346	99.9%	1.1%	41,218
Stephens	6.3%	37.5%	56.3%	64	42.1%	73.6%	3,224
Sutton	68.7%	31.3%	0.0%	67	77.4%	23.4%	1,387
Tarrant	23.4%	66.6%	10.0%	39,412	43.8%	56.2%	639,678
Taylor	22.1%	58.1%	19.8%	2,134	32.4%	67.7%	51,458
Terry	48.9%	23.3%	27.8%	133	67.7%	34.0%	5,794
Titus	11.0%	89.0%	0.0%	237	56.3%	44.3%	14,704
Tom Green	58.3%	39.8%	1.9%	1,348	49.8%	50.8%	41,038
Travis	47.2%	30.3%	22.5%	32,477	54.2%	45.9%	368,290
Trinity	0.0%	100.0%	0.0%	35	14.1%	89.7%	6,436
Upshur	1.0%	99.0%	0.0%	96	15.2%	87.1%	13,317
Uvalde	91.8%	7.3%	0.9%	317	90.0%	13.5%	12,750
Val Verde	89.7%	9.5%	0.8%	717	90.1%	10.8%	21,637
Van Zandt	6.6%	92.6%	0.8%	527	15.8%	85.9%	19,379
Victoria	60.5%	36.0%	3.5%	2,207	63.1%	37.3%	33,351
Walker	8.1%	87.2%	4.7%	1,170	22.0%	81.6%	20,632
Waller	11.9%	88.0%	0.1%	790	46.1%	54.5%	16,840
Ward	22.6%	34.0%	43.4%	53	62.7%	47.1%	3,484
Washington	7.3%	92.7%	0.0%	411	28.0%	74.5%	11,728
Webb	99.1%	0.8%	0.1%	2,957	97.3%	2.7%	153,698
Wharton	51.3%	47.4%	1.4%	439	52.8%	48.7%	16,938
Wichita	17.1%	79.4%	3.5%	1,931	25.5%	74.5%	45,453
Wilbarger	24.3%	74.0%	1.7%	177	31.1%	80.1%	5,071

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County	Hispanic or Latino MF Portfolio Residents	Not Hispanic or Latino MF Portfolio Residents	Unreported Ethnicity MF Portfolio Residents	Total MF Portfolio Residents	Hispanic or Latino Texas Individuals	Not Hispanic or Latino Texas Individuals	Total Texas Individuals
Willacy	94.7%	4.9%	0.4%	285	94.2%	6.4%	12,873
Williamson	32.7%	58.2%	9.1%	8,592	38.4%	61.6%	99,667
Wilson	58.0%	41.7%	0.2%	424	60.6%	39.5%	11,415
Wise	21.7%	78.3%	0.0%	420	26.8%	73.8%	18,861
Wood	3.9%	96.1%	0.0%	181	15.0%	88.6%	15,960
Young	12.7%	87.3%	0.0%	134	30.1%	80.5%	6,298
Zapata	96.0%	4.0%	0.0%	75	100.4%	3.4%	7,890
Zavala	97.3%	2.7%	0.0%	188	97.0%	4.1%	6,993
State Total	39.8%	51.6%	8.6%	476,039	55.3%	45.3%	9,804,978

Source: TDHCA Central Database, May 2017; 2011-2015 ACS Selected Population Tables, Table C17002.

**Figure F-2: Percent of 2017 Individual Residents in Multifamily Properties Participating in TDHCA Programs in Counties with 30 or more Individual Renters in Multifamily Properties Participating in TDHCA Programs by Race**

County	American Indian/Alaskan Native	Asian	Black or African American	Native Hawaiian / Other Pacific Islander	White	Other Race	Multiple Races	Unreported Race	Total Individuals
Anderson	0.1%	0.5%	46.0%	0.2%	49.9%	0.5%	0.7%	2.1%	1,092
Angelina	0.9%	0.5%	58.3%	0.1%	35.8%	3.2%	1.2%	0.1%	1,432
Aransas	2.0%	0.0%	10.6%	0.0%	85.2%	0.0%	2.2%	0.0%	357
Atascosa	2.3%	3.2%	0.0%	0.0%	92.3%	0.0%	0.0%	2.3%	221
Austin	1.2%	3.4%	35.2%	1.2%	58.1%	0.0%	0.9%	0.0%	327
Bandera	0.6%	0.0%	0.6%	0.0%	94.3%	2.5%	0.0%	1.9%	157
Bastrop	0.0%	0.0%	36.8%	0.3%	58.0%	0.6%	3.2%	1.0%	679
Bee	0.0%	0.0%	9.1%	0.0%	90.9%	0.0%	0.0%	0.0%	219
Bell	0.5%	1.4%	39.1%	0.4%	42.9%	7.3%	1.5%	6.8%	3,102
Bexar	0.3%	1.4%	16.1%	0.1%	66.3%	5.5%	0.5%	9.8%	40,789
Blanco	0.8%	0.0%	1.2%	0.0%	73.6%	2.0%	0.0%	22.4%	254
Bosque	0.0%	0.9%	9.3%	0.0%	84.1%	4.7%	0.9%	0.0%	107
Bowie	0.1%	0.1%	82.2%	0.0%	13.5%	2.1%	2.1%	0.0%	1,700
Brazoria	0.3%	0.7%	29.3%	0.1%	52.4%	5.3%	1.7%	10.2%	4,724
Brazos	0.1%	0.4%	46.7%	0.1%	41.5%	3.1%	0.3%	7.8%	2,080
Brewster	0.0%	0.0%	4.3%	0.0%	95.7%	0.0%	0.0%	0.0%	164
Brown	0.5%	0.6%	7.9%	0.0%	71.0%	1.4%	0.0%	18.7%	862
Burleson	0.0%	0.0%	29.3%	0.0%	70.7%	0.0%	0.0%	0.0%	75

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County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian / Other Pacific Islander	White	Other Race	Multiple Races	Unreported Race	Total Individuals
Burnet	0.2%	1.8%	4.6%	0.2%	83.5%	3.1%	1.3%	5.3%	1,021
Caldwell	0.2%	1.0%	9.5%	0.0%	71.3%	9.6%	0.3%	8.2%	624
Calhoun	0.0%	12.1%	9.8%	0.0%	77.5%	0.0%	0.6%	0.0%	684
Callahan	0.0%	0.0%	5.3%	0.0%	94.7%	0.0%	0.0%	0.0%	38
Cameron	0.0%	0.2%	0.8%	0.1%	94.5%	0.2%	0.2%	4.1%	11,171
Camp	0.0%	2.8%	36.9%	0.0%	39.7%	17.3%	3.4%	0.0%	179
Cass	2.9%	0.0%	11.6%	0.0%	85.5%	0.0%	0.0%	0.0%	69
Chambers	0.0%	0.0%	21.2%	0.0%	78.8%	0.0%	0.0%	0.0%	33
Cherokee	0.6%	0.1%	48.9%	0.0%	45.1%	4.6%	0.0%	0.6%	800
Childress	0.0%	2.5%	12.5%	0.8%	80.8%	0.0%	3.3%	0.0%	120
Coleman	0.0%	0.0%	2.7%	0.0%	97.3%	0.0%	0.0%	0.0%	37
Collin	0.4%	1.9%	33.1%	0.3%	44.3%	6.6%	1.9%	11.4%	7,814
Colorado	0.8%	0.0%	42.3%	0.0%	55.6%	0.0%	0.0%	1.2%	248
Comal	0.0%	0.9%	2.7%	0.0%	79.7%	2.3%	0.7%	13.7%	438
Comanche	0.7%	1.5%	4.4%	0.0%	88.9%	3.7%	0.0%	0.7%	135
Cooke	0.6%	1.7%	12.6%	0.4%	74.4%	2.6%	2.6%	5.1%	468
Coryell	1.3%	1.3%	25.9%	0.0%	53.3%	10.8%	2.7%	4.7%	922
Crockett	1.5%	0.0%	3.0%	0.0%	95.5%	0.0%	0.0%	0.0%	67
Dallam	0.0%	0.5%	6.7%	0.0%	92.7%	0.0%	0.0%	0.0%	193
Dallas	0.2%	1.0%	60.1%	0.1%	26.4%	6.5%	0.6%	5.2%	56,858
Deaf Smith	0.4%	0.0%	2.4%	0.0%	96.1%	0.8%	0.0%	0.3%	720
Denton	0.4%	7.5%	27.6%	0.2%	47.4%	4.8%	0.9%	11.3%	10,382
DeWitt	0.0%	0.0%	0.0%	0.0%	0.0%	3.0%	0.0%	97.0%	134
Dimmit	0.0%	0.0%	2.9%	0.0%	97.1%	0.0%	0.0%	0.0%	314
Duval	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	82
Eastland	0.0%	1.8%	4.3%	0.0%	93.9%	0.0%	0.0%	0.0%	164
Ector	0.1%	0.1%	17.9%	0.0%	79.5%	0.4%	0.0%	2.0%	2,047
Ellis	0.1%	0.1%	33.0%	0.7%	46.6%	3.7%	1.1%	14.7%	2,998
El Paso	1.0%	0.2%	2.7%	0.1%	88.8%	3.4%	0.2%	3.7%	18,122
Erath	0.0%	0.0%	1.7%	0.0%	95.5%	2.8%	0.0%	0.0%	288
Falls	1.4%	0.0%	81.9%	0.0%	16.7%	0.0%	0.0%	0.0%	72
Fannin	1.6%	0.0%	8.1%	0.0%	86.3%	0.0%	1.6%	2.4%	124
Fayette	0.0%	0.0%	37.8%	1.4%	60.8%	0.0%	0.0%	0.0%	74
Fort Bend	0.2%	4.5%	49.8%	0.1%	33.2%	8.1%	0.3%	3.8%	4,124
Franklin	0.0%	0.4%	13.4%	0.4%	45.2%	4.2%	4.9%	31.4%	283
Freestone	0.0%	0.0%	29.7%	0.0%	67.1%	0.0%	0.0%	3.2%	158
Frio	0.0%	0.0%	0.9%	0.0%	98.4%	0.0%	0.0%	0.7%	555

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County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian / Other Pacific Islander	White	Other Race	Multiple Races	Unreported Race	Total Individuals
Gaines	0.0%	0.0%	5.0%	0.0%	70.6%	0.6%	0.0%	23.8%	160
Galveston	0.4%	0.6%	43.9%	0.0%	35.4%	2.0%	0.9%	16.8%	6,057
Gillespie	0.2%	2.6%	0.7%	0.0%	73.9%	15.5%	0.3%	6.8%	575
Goliad	0.0%	0.0%	6.1%	0.0%	75.8%	0.0%	0.0%	18.2%	66
Gonzales	0.8%	0.0%	23.1%	0.4%	53.5%	0.8%	0.8%	20.8%	260
Gray	1.8%	0.0%	5.2%	0.0%	91.2%	1.8%	0.0%	0.0%	329
Grayson	0.5%	0.7%	11.9%	0.0%	63.6%	3.2%	1.1%	19.0%	1,326
Gregg	0.1%	0.4%	59.6%	0.2%	29.2%	1.9%	1.4%	7.1%	1,806
Grimes	0.0%	0.0%	57.5%	0.0%	16.1%	0.0%	0.0%	26.4%	299
Guadalupe	0.2%	0.8%	18.4%	0.0%	66.1%	9.2%	1.1%	4.1%	1,323
Hale	0.2%	2.2%	6.9%	0.0%	88.1%	0.0%	0.9%	1.7%	462
Hardin	0.3%	0.3%	19.3%	0.5%	55.3%	0.3%	0.5%	23.6%	398
Harris	0.5%	2.3%	50.6%	0.1%	32.9%	6.7%	1.0%	5.8%	93,779
Harrison	0.0%	0.2%	54.4%	0.0%	7.7%	1.1%	0.2%	36.4%	612
Hays	0.2%	0.9%	6.5%	0.2%	65.6%	5.6%	1.2%	19.8%	4,837
Hemphill	0.0%	3.3%	3.3%	0.0%	91.8%	0.0%	1.6%	0.0%	61
Henderson	0.3%	0.0%	25.2%	0.0%	68.1%	3.3%	0.8%	2.2%	868
Hidalgo	0.0%	0.1%	0.6%	0.0%	95.8%	0.7%	0.2%	2.6%	14,947
Hill	0.2%	0.0%	43.8%	0.2%	54.0%	0.0%	1.7%	0.0%	411
Hockley	0.0%	0.0%	12.8%	0.0%	79.9%	4.7%	0.0%	2.7%	298
Hood	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	125
Hopkins	0.0%	0.0%	12.5%	0.0%	81.9%	5.0%	0.6%	0.0%	321
Houston	0.0%	3.4%	91.0%	0.0%	4.1%	1.5%	0.0%	0.0%	267
Howard	0.4%	0.1%	11.5%	0.0%	66.7%	11.0%	0.6%	9.7%	702
Hunt	0.6%	2.0%	37.1%	0.3%	54.5%	1.6%	3.1%	0.8%	1,132
Hutchinson	1.9%	0.0%	3.8%	0.0%	69.0%	1.9%	1.1%	22.2%	261
Jack	0.0%	0.0%	0.8%	0.0%	98.4%	0.0%	0.0%	0.8%	123
Jackson	0.0%	0.0%	20.7%	0.0%	79.3%	0.0%	0.0%	0.0%	82
Jasper	0.5%	0.0%	89.6%	1.1%	8.8%	0.0%	0.0%	0.0%	364
Jefferson	0.2%	0.9%	74.8%	0.1%	14.6%	1.3%	0.8%	7.2%	7,895
Jim Wells	0.2%	0.7%	0.2%	0.2%	97.4%	0.2%	0.4%	0.7%	457
Johnson	0.5%	0.6%	8.4%	1.6%	77.8%	6.1%	0.7%	4.3%	2,805
Karnes	1.5%	0.4%	3.8%	0.4%	72.9%	1.9%	0.0%	19.2%	266
Kaufman	0.9%	1.4%	25.1%	0.0%	64.9%	5.7%	1.4%	0.5%	2,093
Kendall	0.0%	0.8%	1.3%	0.0%	72.8%	13.4%	0.0%	11.8%	621
Kerr	0.0%	0.0%	4.4%	0.0%	77.7%	0.9%	0.0%	17.0%	677
Kinney	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	32

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County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian / Other Pacific Islander	White	Other Race	Multiple Races	Unreported Race	Total Individuals
Kleberg	0.1%	0.5%	7.2%	0.3%	91.7%	0.2%	0.0%	0.1%	1,033
Lamar	0.9%	0.9%	24.4%	0.0%	61.0%	1.5%	0.9%	10.4%	541
Lamb	2.5%	0.8%	7.5%	0.0%	86.7%	0.0%	2.5%	0.0%	120
Lampasas	1.3%	0.4%	3.8%	0.4%	92.1%	1.7%	0.0%	0.4%	239
La Salle	0.0%	0.0%	1.0%	0.0%	98.5%	0.0%	0.5%	0.0%	196
Lavaca	0.0%	0.0%	33.3%	0.0%	64.4%	0.0%	2.2%	0.0%	135
Lee	0.0%	4.9%	16.7%	1.2%	56.3%	18.4%	2.0%	0.4%	245
Leon	0.0%	5.6%	27.8%	0.0%	66.7%	0.0%	0.0%	0.0%	36
Liberty	0.0%	0.4%	31.7%	0.0%	63.1%	3.5%	0.3%	1.0%	982
Limestone	0.0%	0.0%	61.2%	0.0%	33.1%	5.0%	0.8%	0.0%	381
Live Oak	0.0%	0.0%	3.5%	0.0%	65.0%	4.2%	0.0%	27.3%	143
Llano	0.0%	1.6%	2.5%	0.0%	94.7%	0.8%	0.4%	0.0%	510
Lubbock	1.7%	0.6%	22.7%	0.1%	35.5%	2.1%	1.1%	36.0%	4,800
McCulloch	0.0%	4.8%	1.0%	0.0%	90.5%	0.0%	3.8%	0.0%	105
McLennan	0.2%	0.5%	57.4%	0.1%	31.2%	3.1%	1.2%	6.2%	2,545
Madison	0.0%	0.0%	68.4%	0.0%	28.1%	0.0%	1.8%	1.8%	114
Marion	0.0%	0.0%	95.8%	0.0%	2.1%	0.0%	2.1%	0.0%	48
Matagorda	0.2%	2.4%	22.3%	0.0%	74.6%	0.0%	0.5%	0.0%	422
Maverick	0.0%	0.0%	0.0%	0.0%	99.5%	0.4%	0.0%	0.1%	932
Medina	0.0%	0.0%	2.0%	0.2%	97.2%	0.0%	0.6%	0.0%	506
Midland	0.3%	0.4%	19.4%	0.0%	50.9%	5.4%	0.9%	22.7%	2,342
Milam	0.3%	0.8%	48.3%	0.3%	49.1%	0.5%	0.8%	0.0%	393
Mitchell	0.0%	0.0%	30.6%	0.0%	68.5%	0.0%	0.0%	0.8%	124
Montague	1.1%	0.4%	1.1%	0.4%	95.3%	1.4%	0.4%	0.0%	276
Montgomery	0.5%	1.8%	14.6%	0.3%	65.3%	4.2%	0.7%	12.7%	7,555
Moore	2.4%	1.8%	5.4%	0.0%	62.0%	12.7%	6.6%	9.0%	166
Morris	0.0%	0.0%	55.2%	1.5%	43.3%	0.0%	0.0%	0.0%	67
Nacogdoches	0.1%	1.6%	61.0%	0.0%	20.6%	2.3%	2.9%	11.5%	1,664
Navarro	0.3%	0.0%	46.3%	3.1%	40.8%	7.0%	0.7%	1.7%	287
Newton	2.6%	0.0%	20.5%	0.0%	74.4%	0.0%	0.0%	2.6%	39
Nolan	0.0%	1.5%	19.7%	0.0%	63.1%	8.1%	4.0%	3.5%	198
Nueces	0.1%	2.1%	10.3%	0.0%	83.2%	1.1%	0.5%	2.5%	7,018
Ochiltree	0.0%	0.0%	7.8%	0.0%	92.2%	0.0%	0.0%	0.0%	77
Orange	0.4%	2.2%	30.9%	0.0%	44.1%	1.1%	0.8%	20.5%	1,706
Palo Pinto	0.8%	0.0%	6.6%	0.3%	85.7%	3.6%	2.7%	0.3%	364
Panola	0.0%	1.5%	38.8%	0.0%	59.7%	0.0%	0.0%	0.0%	134
Parker	1.2%	0.7%	10.6%	0.7%	80.1%	4.2%	2.3%	0.2%	1,168

Program and Portfolio Analysis County Supplement

County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian / Other Pacific Islander	White	Other Race	Multiple Races	Unreported Race	Total Individuals
Pecos	1.1%	0.0%	1.4%	0.0%	72.7%	1.1%	1.4%	22.3%	363
Polk	0.8%	0.0%	58.0%	0.0%	41.2%	0.0%	0.0%	0.0%	131
Potter	0.6%	13.5%	17.2%	0.0%	37.0%	4.6%	1.5%	25.6%	4,180
Presidio	0.0%	0.0%	10.5%	0.0%	88.6%	0.0%	1.0%	0.0%	105
Rains	0.8%	0.8%	12.8%	0.0%	81.6%	4.0%	0.0%	0.0%	125
Randall	1.0%	1.0%	7.8%	0.0%	81.3%	3.6%	1.3%	4.0%	477
Red River	1.5%	0.0%	32.6%	0.0%	65.2%	0.0%	0.7%	0.0%	135
Reeves	0.4%	0.4%	2.0%	0.0%	96.0%	0.0%	0.0%	1.2%	253
Refugio	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%	0.0%	98.8%	81
Robertson	0.0%	0.0%	70.0%	0.0%	30.0%	0.0%	0.0%	0.0%	30
Rockwall	0.0%	3.3%	9.9%	0.0%	84.9%	1.9%	0.0%	0.0%	212
Rusk	0.5%	4.1%	36.9%	0.0%	58.1%	0.5%	0.0%	0.0%	222
Sabine	6.1%	0.0%	20.4%	0.0%	73.5%	0.0%	0.0%	0.0%	49
San Augustine	0.0%	0.0%	86.1%	0.0%	13.9%	0.0%	0.0%	0.0%	36
San Jacinto	0.0%	0.0%	26.7%	0.0%	70.5%	0.0%	2.4%	0.5%	210
San Patricio	0.0%	0.0%	0.9%	0.0%	63.7%	0.4%	0.1%	34.9%	955
Schleicher	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	40
Scurry	0.0%	1.2%	4.8%	0.0%	91.6%	1.8%	0.0%	0.6%	167
Shackelford	0.0%	0.0%	1.4%	0.0%	98.6%	0.0%	0.0%	0.0%	74
Shelby	0.4%	0.0%	62.6%	1.6%	35.4%	0.0%	0.0%	0.0%	243
Smith	0.2%	1.1%	58.4%	0.0%	26.0%	2.4%	1.1%	10.8%	3,724
Starr	0.0%	1.7%	0.3%	1.7%	95.4%	0.0%	0.9%	0.0%	346
Stephens	0.0%	0.0%	4.7%	0.0%	93.8%	0.0%	1.6%	0.0%	64
Sutton	3.0%	0.0%	0.0%	1.5%	92.5%	3.0%	0.0%	0.0%	67
Tarrant	0.4%	2.3%	43.3%	0.3%	34.8%	8.0%	0.9%	9.9%	39,412
Taylor	0.4%	0.3%	22.2%	0.1%	49.0%	6.4%	1.8%	19.7%	2,134
Terry	0.0%	0.0%	12.0%	0.0%	59.4%	0.8%	0.0%	27.8%	133
Titus	0.4%	0.0%	50.6%	0.0%	42.2%	6.3%	0.0%	0.4%	237
Tom Green	0.1%	0.9%	11.7%	0.1%	82.1%	1.3%	1.7%	2.1%	1,348
Travis	0.3%	1.4%	18.2%	0.2%	47.6%	8.1%	1.0%	23.2%	32,477
Trinity	0.0%	0.0%	8.6%	0.0%	91.4%	0.0%	0.0%	0.0%	35
Upshur	2.1%	0.0%	28.1%	0.0%	69.8%	0.0%	0.0%	0.0%	96
Uvalde	0.0%	1.3%	0.9%	0.0%	95.6%	1.3%	0.0%	0.9%	317
Val Verde	0.3%	0.4%	4.3%	0.6%	92.3%	1.0%	0.3%	0.8%	717
Van Zandt	0.0%	0.8%	8.5%	0.0%	87.9%	1.5%	0.9%	0.4%	527
Victoria	0.2%	0.5%	13.8%	0.0%	68.3%	1.9%	12.6%	2.7%	2,207
Walker	0.3%	2.3%	50.2%	0.0%	39.2%	3.1%	0.0%	5.0%	1,170

Program and Portfolio Analysis County Supplement

County	American Indian/Alaskan Native	Asian	Black or African American	Native Hawaiian / Other Pacific Islander	White	Other Race	Multiple Races	Unreported Race	Total Individuals
Waller	0.3%	0.5%	74.1%	0.0%	23.8%	0.9%	0.4%	0.1%	790
Ward	0.0%	0.0%	28.3%	0.0%	28.3%	3.8%	0.0%	39.6%	53
Washington	0.7%	0.2%	49.9%	0.0%	48.9%	0.0%	0.2%	0.0%	411
Webb	0.0%	0.2%	0.2%	0.0%	99.3%	0.2%	0.0%	0.1%	2,957
Wharton	0.0%	0.0%	27.3%	0.0%	70.8%	0.7%	0.0%	1.1%	439
Wichita	0.5%	0.6%	29.2%	0.0%	58.8%	6.6%	1.3%	3.1%	1,931
Wilbarger	2.3%	1.7%	18.1%	0.0%	76.3%	0.6%	0.0%	1.1%	177
Willacy	0.0%	0.0%	0.4%	0.0%	99.6%	0.0%	0.0%	0.0%	285
Williamson	0.8%	1.8%	16.7%	0.2%	64.5%	4.3%	1.1%	10.7%	8,592
Wilson	0.0%	1.2%	3.1%	0.0%	93.9%	1.4%	0.2%	0.2%	424
Wise	0.5%	0.7%	4.0%	0.5%	92.6%	1.2%	0.5%	0.0%	420
Wood	0.0%	0.0%	5.5%	0.0%	90.1%	0.0%	4.4%	0.0%	181
Young	0.0%	0.0%	3.7%	0.0%	95.5%	0.0%	0.7%	0.0%	134
Zapata	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	75
Zavala	0.0%	0.5%	0.0%	0.0%	99.5%	0.0%	0.0%	0.0%	188
State Total	0.4%	1.6%	33.4%	0.2%	49.7%	5.2%	0.9%	8.7%	476,039

Source: TDHCA Central Database, May 2017.

**Figure F-3: Percent of Texas Individuals at or Below 200% Poverty with 30 or more Individual Renters in Multifamily Properties Participating in TDHCA Programs by Race**

County	American Indian/Alaskan Native	Asian	Black or African American	Native Hawaiian/ Other Pacific Islander	White	Other Race	Multiple Races	Total Individuals
Anderson	0.0%	0.0%	24.2%	0.0%	68.6%	4.8%	2.4%	20,612
Angelina	0.0%	0.9%	22.6%	0.0%	69.1%	5.6%	1.8%	37,444
Aransas	0.0%	0.0%	0.0%	0.0%	94.2%	0.0%	5.8%	9,517
Atascosa	0.0%	0.0%	0.0%	0.0%	92.2%	4.7%	3.0%	17,156
Austin	0.0%	0.0%	15.2%	0.0%	73.6%	5.3%	5.8%	9,004
Bandera	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	5,310
Bastrop	0.0%	0.7%	7.9%	0.0%	74.7%	13.5%	3.3%	25,837
Bee	0.0%	0.0%	1.7%	0.0%	86.8%	11.5%	0.0%	11,910
Bell	1.0%	3.0%	26.1%	0.9%	57.5%	5.9%	5.6%	118,814
Bexar	0.8%	1.9%	8.0%	0.1%	75.1%	11.0%	3.0%	707,680
Blanco	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	3,036
Bosque	0.0%	0.0%	0.0%	0.0%	93.7%	2.2%	4.1%	6,606
Bowie	0.4%	1.0%	35.7%	0.0%	58.4%	1.4%	3.1%	36,507

Program and Portfolio Analysis County Supplement

County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian/ Other Pacific Islander	White	Other Race	Multiple Races	Total Individuals
Brazoria	0.3%	2.3%	11.3%	0.0%	75.8%	8.6%	1.7%	84,283
Brazos	0.2%	7.2%	14.2%	0.0%	65.6%	10.0%	2.8%	91,617
Brewster	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	3,710
Brown	0.0%	0.0%	5.6%	0.0%	90.8%	1.5%	2.2%	15,309
Burleson	0.0%	0.0%	18.9%	0.0%	74.1%	7.0%	0.0%	5,619
Burnet	0.0%	0.0%	0.0%	0.0%	95.3%	4.7%	0.0%	15,490
Caldwell	0.0%	0.0%	7.9%	0.0%	68.6%	21.5%	2.0%	17,603
Calhoun	0.0%	3.6%	4.4%	0.0%	87.8%	0.0%	4.2%	7,871
Callahan	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	4,878
Cameron	0.2%	0.2%	0.4%	0.0%	92.5%	5.8%	0.9%	249,935
Camp	0.0%	0.0%	24.1%	0.0%	64.5%	11.5%	0.0%	5,548
Cass	0.0%	0.0%	26.6%	0.0%	73.4%	0.0%	0.0%	12,595
Chambers	0.0%	0.0%	9.1%	0.0%	81.6%	9.3%	0.0%	9,862
Cherokee	0.0%	0.0%	21.3%	0.0%	72.6%	2.8%	3.4%	23,286
Childress	0.0%	0.0%	9.0%	0.0%	91.0%	0.0%	0.0%	2,298
Coleman	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	4,071
Collin	0.4%	9.4%	12.2%	0.0%	67.8%	6.3%	3.9%	159,327
Colorado	0.0%	0.0%	23.6%	0.0%	66.9%	9.5%	0.0%	7,291
Comal	0.0%	0.6%	1.8%	0.0%	89.5%	5.5%	2.7%	30,159
Comanche	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	5,847
Cooke	0.0%	0.0%	4.6%	0.0%	91.8%	0.0%	3.6%	12,882
Coryell	1.3%	2.1%	13.8%	0.8%	70.3%	3.9%	7.9%	24,701
Crockett	0.0%	0.0%	0.0%	0.0%	41.7%	58.3%	0.0%	811
Dallam	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	2,698
Dallas	0.4%	3.8%	24.3%	0.1%	55.3%	13.7%	2.5%	1,066,652
Deaf Smith	0.0%	0.0%	0.0%	0.0%	89.8%	10.2%	0.0%	8,207
Denton	0.5%	7.6%	12.8%	0.0%	70.0%	4.8%	4.4%	163,541
DeWitt	0.0%	0.0%	15.8%	0.0%	56.3%	27.8%	0.0%	6,478
Dimmit	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	5,379
Duval	0.0%	0.0%	0.0%	0.0%	87.0%	13.0%	0.0%	5,436
Eastland	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	8,095
Ector	0.4%	0.2%	5.7%	0.0%	81.2%	9.4%	3.1%	49,238
Ellis	2.2%	0.2%	12.9%	0.0%	72.2%	8.3%	4.2%	48,205
El Paso	0.7%	0.7%	2.6%	0.2%	82.4%	11.5%	1.9%	412,299
Erath	0.0%	0.0%	0.0%	0.0%	89.9%	7.1%	2.9%	17,693
Falls	0.0%	0.0%	31.4%	0.0%	64.4%	4.0%	0.3%	6,965
Fannin	0.0%	0.0%	9.3%	0.0%	84.7%	2.6%	3.4%	11,968



Program and Portfolio Analysis County Supplement

County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian/ Other Pacific Islander	White	Other Race	Multiple Races	Total Individuals
Fayette	0.0%	0.0%	10.6%	0.0%	85.9%	3.5%	0.0%	7,712
Fort Bend	0.1%	13.5%	23.5%	0.0%	48.0%	12.1%	2.8%	136,498
Franklin	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	3,688
Freestone	0.0%	0.0%	23.3%	0.0%	76.7%	0.0%	0.0%	6,230
Frio	0.0%	0.0%	1.0%	0.0%	71.4%	27.7%	0.0%	7,873
Gaines	0.0%	0.0%	0.0%	0.0%	92.1%	7.9%	0.0%	6,393
Galveston	0.4%	3.3%	20.3%	0.0%	69.2%	4.0%	2.8%	88,893
Gillespie	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	7,974
Goliad	0.0%	0.0%	0.0%	0.0%	58.9%	41.1%	0.0%	2,204
Gonzales	0.0%	0.0%	10.5%	0.0%	41.7%	46.2%	1.6%	9,173
Gray	0.0%	0.0%	1.9%	0.0%	85.9%	7.5%	4.8%	8,057
Grayson	1.4%	0.9%	10.5%	0.0%	79.6%	3.1%	4.5%	44,351
Gregg	0.0%	1.8%	31.0%	0.0%	63.1%	1.5%	2.6%	49,796
Grimes	0.0%	0.0%	25.6%	0.0%	69.1%	3.7%	1.6%	9,689
Guadalupe	0.0%	1.1%	6.3%	0.0%	76.2%	13.9%	2.5%	39,451
Hale	0.0%	0.0%	4.1%	0.0%	84.6%	5.1%	6.2%	15,412
Hardin	0.0%	0.0%	12.5%	0.0%	86.7%	0.0%	0.8%	16,781
Harris	0.5%	4.8%	22.8%	0.1%	57.4%	12.2%	2.1%	1,687,329
Harrison	0.0%	0.0%	31.4%	0.0%	60.7%	5.5%	2.4%	24,930
Hays	0.0%	1.3%	3.8%	0.0%	80.4%	10.5%	4.1%	57,769
Hemphill	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	1,067
Henderson	0.0%	0.0%	8.1%	0.0%	87.4%	2.3%	2.2%	32,596
Hidalgo	0.3%	0.4%	0.4%	0.0%	91.7%	6.4%	0.7%	493,192
Hill	0.0%	0.0%	11.5%	0.0%	85.3%	1.9%	1.3%	14,687
Hockley	0.0%	0.0%	5.2%	0.0%	81.2%	9.9%	3.6%	8,364
Hood	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	14,674
Hopkins	0.0%	0.0%	10.0%	0.0%	78.7%	8.5%	2.8%	14,704
Houston	0.0%	0.0%	38.8%	0.0%	49.1%	9.7%	2.4%	9,230
Howard	0.0%	0.0%	7.6%	0.0%	81.5%	6.8%	4.2%	10,880
Hunt	0.0%	1.1%	11.1%	0.0%	71.8%	14.5%	1.5%	33,744
Hutchinson	0.0%	0.0%	4.9%	0.0%	87.7%	3.9%	3.4%	8,118
Jack	0.0%	0.0%	2.6%	0.0%	97.4%	0.0%	0.0%	2,906
Jackson	0.0%	0.0%	9.4%	0.0%	86.0%	4.6%	0.0%	4,364
Jasper	0.0%	0.0%	25.8%	0.0%	74.2%	0.0%	0.0%	13,008
Jefferson	0.3%	4.0%	43.2%	0.0%	47.0%	3.8%	1.7%	98,173
Jim Wells	0.0%	0.0%	0.0%	0.0%	95.9%	4.1%	0.0%	17,513
Johnson	1.3%	0.4%	2.9%	0.0%	89.9%	2.2%	3.3%	47,415

Program and Portfolio Analysis County Supplement

County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian/ Other Pacific Islander	White	Other Race	Multiple Races	Total Individuals
Karnes	0.0%	0.0%	4.2%	0.0%	49.3%	46.5%	0.0%	5,320
Kaufman	0.0%	0.0%	14.5%	0.0%	76.4%	6.0%	3.0%	34,230
Kendall	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	6,698
Kerr	0.0%	0.0%	1.9%	0.0%	93.3%	2.8%	2.1%	19,015
Kinney	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	1,433
Kleberg	0.0%	0.0%	5.6%	0.0%	85.4%	9.0%	0.0%	14,126
Lamar	0.0%	0.0%	19.2%	0.0%	74.9%	0.0%	5.9%	20,466
Lamb	0.0%	0.0%	8.9%	0.0%	87.3%	3.8%	0.0%	6,786
Lampasas	0.0%	0.0%	4.0%	0.0%	96.0%	0.0%	0.0%	5,917
La Salle	0.0%	0.0%	0.0%	0.0%	80.7%	19.3%	0.0%	3,617
Lavaca	0.0%	0.0%	14.2%	0.0%	62.4%	23.4%	0.0%	5,894
Lee	0.0%	0.0%	14.9%	0.0%	74.4%	10.8%	0.0%	5,520
Leon	0.0%	0.0%	15.4%	0.0%	79.6%	5.0%	0.0%	5,873
Liberty	0.0%	0.0%	13.7%	0.0%	74.4%	9.3%	2.7%	28,057
Limestone	0.0%	0.0%	22.6%	0.0%	74.7%	2.7%	0.0%	10,337
Live Oak	0.0%	0.0%	0.0%	0.0%	98.7%	1.3%	0.0%	3,342
Llano	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	6,367
Lubbock	0.9%	1.9%	9.8%	0.0%	73.1%	10.0%	4.2%	114,751
McCulloch	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	3,003
McLennan	0.4%	1.9%	19.9%	0.0%	69.6%	5.3%	2.8%	102,707
Madison	0.0%	0.0%	14.0%	0.0%	80.1%	3.2%	2.7%	3,929
Marion	0.0%	0.0%	34.0%	0.0%	66.0%	0.0%	0.0%	4,605
Matagorda	0.0%	0.0%	12.2%	0.0%	78.5%	4.3%	5.1%	15,193
Maverick	1.2%	0.0%	0.0%	0.0%	94.9%	3.9%	0.0%	32,545
Medina	0.0%	0.0%	0.4%	0.0%	90.9%	5.5%	3.2%	13,594
Midland	0.0%	0.8%	10.7%	0.0%	76.5%	9.3%	2.7%	37,045
Milam	0.0%	0.0%	11.4%	0.0%	79.4%	5.3%	4.0%	9,964
Mitchell	0.0%	0.0%	8.2%	0.0%	89.7%	2.1%	0.0%	1,730
Montague	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	7,312
Montgomery	0.9%	1.9%	5.4%	0.0%	80.3%	7.5%	4.0%	140,631
Moore	0.0%	15.3%	2.4%	0.0%	75.4%	6.9%	0.0%	9,142
Morris	0.0%	0.0%	28.3%	0.0%	61.6%	10.1%	0.0%	4,928
Nacogdoches	0.0%	1.8%	23.1%	0.0%	69.8%	3.1%	2.3%	27,860
Navarro	4.1%	0.0%	18.2%	0.0%	70.5%	4.2%	3.0%	21,567
Newton	0.0%	0.0%	25.6%	0.0%	74.4%	0.0%	0.0%	5,350
Nolan	0.0%	0.0%	0.0%	0.0%	94.7%	5.3%	0.0%	6,050
Nueces	0.6%	1.1%	5.1%	0.0%	84.9%	6.1%	2.2%	135,728

Program and Portfolio Analysis County Supplement

County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian/ Other Pacific Islander	White	Other Race	Multiple Races	Total Individuals
Ochiltree	0.0%	0.0%	0.0%	0.0%	95.3%	4.7%	0.0%	3,503
Orange	0.0%	1.0%	13.3%	0.0%	81.6%	1.5%	2.6%	28,588
Palo Pinto	0.0%	0.0%	3.3%	0.0%	86.8%	7.6%	2.3%	12,292
Panola	0.0%	0.0%	31.8%	0.0%	68.2%	0.0%	0.0%	8,303
Parker	0.7%	0.6%	3.0%	0.0%	89.3%	4.4%	2.0%	29,182
Pecos	0.0%	0.0%	0.7%	0.0%	84.1%	15.2%	0.0%	4,361
Polk	1.9%	0.0%	13.2%	0.0%	81.3%	1.4%	2.2%	18,164
Potter	0.6%	5.1%	11.4%	0.0%	74.9%	3.2%	4.7%	55,789
Presidio	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	3,939
Rains	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	3,092
Randall	0.7%	1.6%	4.3%	0.0%	86.7%	3.0%	3.7%	31,982
Red River	0.0%	0.0%	27.1%	0.0%	71.2%	0.0%	1.7%	6,304
Reeves	0.0%	0.0%	3.1%	0.0%	89.6%	7.3%	0.0%	4,568
Refugio	0.0%	0.0%	7.1%	0.0%	86.8%	6.1%	0.0%	2,587
Robertson	0.0%	0.0%	31.6%	0.0%	68.4%	0.0%	0.0%	5,997
Rockwall	0.0%	2.7%	7.9%	0.0%	80.4%	4.6%	4.5%	16,733
Rusk	0.0%	0.0%	26.2%	0.0%	71.0%	1.1%	1.7%	18,879
Sabine	0.0%	0.0%	15.5%	0.0%	84.5%	0.0%	0.0%	5,202
San Augustine	0.0%	0.0%	29.0%	0.0%	71.0%	0.0%	0.0%	4,496
San Jacinto	0.0%	0.0%	12.3%	0.0%	87.7%	0.0%	0.0%	11,295
San Patricio	0.0%	0.4%	2.6%	0.0%	93.0%	2.2%	1.9%	23,909
Schleicher	0.0%	0.0%	0.0%	0.0%	84.6%	15.4%	0.0%	982
Scurry	0.0%	0.0%	1.0%	0.0%	92.1%	6.9%	0.0%	5,191
Shackelford	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	1,139
Shelby	0.0%	0.0%	26.1%	0.0%	73.9%	0.0%	0.0%	12,585
Smith	0.0%	1.5%	26.1%	0.0%	68.0%	3.0%	1.4%	84,271
Starr	0.0%	0.0%	0.0%	0.0%	96.3%	3.7%	0.0%	41,218
Stephens	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	3,224
Sutton	0.0%	0.0%	0.0%	0.0%	79.3%	20.7%	0.0%	1,387
Tarrant	0.5%	4.9%	20.4%	0.3%	62.0%	9.0%	2.9%	639,678
Taylor	0.8%	2.5%	10.5%	0.0%	73.6%	9.3%	3.3%	51,458
Terry	0.0%	0.0%	3.5%	0.0%	90.7%	5.8%	0.0%	5,794
Titus	0.0%	0.0%	15.3%	0.0%	63.7%	18.3%	2.7%	14,704
Tom Green	0.0%	1.3%	5.3%	0.0%	84.5%	6.3%	2.6%	41,038
Travis	0.6%	4.7%	11.0%	0.0%	69.5%	11.3%	2.9%	368,290
Trinity	0.0%	0.0%	14.9%	0.0%	85.1%	0.0%	0.0%	6,436
Upshur	0.0%	0.0%	10.9%	0.0%	78.0%	6.2%	4.9%	13,317

Program and Portfolio Analysis County Supplement

County	American Indian/ Alaskan Native	Asian	Black or African American	Native Hawaiian/ Other Pacific Islander	White	Other Race	Multiple Races	Total Individuals
Uvalde	0.0%	0.0%	0.0%	0.0%	94.7%	5.3%	0.0%	12,750
Val Verde	0.0%	0.0%	0.0%	0.0%	94.6%	3.6%	1.9%	21,637
Van Zandt	0.0%	0.0%	2.8%	0.0%	92.2%	1.9%	3.1%	19,379
Victoria	0.0%	1.0%	8.4%	0.0%	80.3%	4.4%	5.8%	33,351
Walker	0.0%	0.0%	26.2%	0.0%	71.3%	2.5%	0.0%	20,632
Waller	0.0%	0.0%	29.1%	0.0%	64.4%	2.4%	4.1%	16,840
Ward	0.0%	0.0%	0.0%	0.0%	88.9%	11.1%	0.0%	3,484
Washington	0.0%	0.0%	26.9%	0.0%	73.1%	0.0%	0.0%	11,728
Webb	0.5%	0.3%	0.2%	0.0%	94.6%	4.0%	0.5%	153,698
Wharton	0.0%	0.0%	18.5%	0.0%	79.5%	2.0%	0.0%	16,938
Wichita	0.9%	1.6%	13.5%	0.0%	75.1%	4.5%	4.4%	45,453
Wilbarger	0.0%	0.0%	18.3%	0.0%	81.7%	0.0%	0.0%	5,071
Willacy	0.0%	0.0%	0.0%	0.0%	96.2%	3.8%	0.0%	12,873
Williamson	0.4%	3.3%	9.6%	0.0%	79.1%	3.6%	4.0%	99,667
Wilson	0.0%	0.0%	1.8%	0.0%	89.3%	4.3%	4.5%	11,415
Wise	0.0%	0.0%	0.3%	0.0%	95.0%	1.8%	2.8%	18,861
Wood	0.0%	0.0%	5.9%	0.0%	89.1%	5.0%	0.0%	15,960
Young	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	6,298
Zapata	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	7,890
Zavala	0.0%	0.0%	0.0%	0.0%	92.2%	7.8%	0.0%	6,993
State Total	0.4%	2.9%	14.2%	0.1%	71.1%	8.9%	2.4%	9,804,978

Source: 2011-2015 ACS Selected Population Tables, Table C17002

**Figure F-4: TDHCA Multifamily Unit Set Asides by Income Eligibility Level in Counties with 30 or more Individual Renters in Active Multifamily Properties Participating in TDHCA Programs**

County	ELI	VLI	LI	Total Units
Anderson	11	55	573	666
Andrews	0	0	24	24
Angelina	41	232	489	824
Aransas	0	24	130	154
Atascosa	12	23	77	152
Austin	1	26	147	174
Bailey	0	0	0	16
Bandera	0	8	68	76
Bastrop	11	75	213	371
Bee	12	35	83	130
Bell	79	354	991	1,915

Program and Portfolio Analysis County Supplement

<b>County</b>	<b>ELI</b>	<b>VLI</b>	<b>LI</b>	<b>Total Units</b>
Bexar	643	2,111	12,788	17,790
Blanco	2	4	14	142
Bosque	0	40	16	86
Bowie	56	243	677	996
Brazoria	108	364	1,511	2,316
Brazos	41	116	998	1,266
Brewster	0	0	92	116
Brown	19	152	353	598
Burleson	0	8	72	80
Burnet	37	100	351	572
Caldwell	0	63	167	357
Calhoun	6	38	218	262
Callahan	10	14	0	24
Cameron	206	1,015	2,684	4,277
Camp	0	23	53	76
Cass	3	7	58	68
Chambers	0	0	32	32
Cherokee	38	68	320	426
Childress	1	6	73	80
Coleman	5	7	12	24
Collin	41	427	2,868	4,400
Colorado	5	19	134	158
Comal	18	29	124	233
Comanche	3	8	49	70
Cooke	7	50	239	304
Coryell	49	150	218	452
Crockett	0	16	40	56
Crosby	0	2	22	24
Dallam	16	0	84	100
Dallas	708	4,570	20,258	28,121
Dawson	0	0	24	24
De Witt	4	10	34	56
Deaf Smith	11	0	254	288
Denton	111	572	3,913	5,222
Dimmit	0	17	85	130
Duval	0	0	44	49
Eastland	23	27	84	134

Program and Portfolio Analysis County Supplement

<b>County</b>	<b>ELI</b>	<b>VLI</b>	<b>LI</b>	<b>Total Units</b>
Ector	50	280	542	900
El Paso	431	1,642	5,331	7,890
Ellis	53	189	1,040	1,364
Erath	9	42	93	144
Falls	0	0	57	57
Fannin	0	0	97	97
Fayette	3	8	29	40
Fort Bend	111	298	1,643	2,193
Franklin	0	10	90	100
Freestone	4	15	46	93
Frio	7	31	218	260
Gaines	5	19	68	92
Galveston	151	774	2,207	3,350
Garza	0	0	24	24
Gillespie	7	60	200	326
Goliad	0	12	20	32
Gonzales	2	60	33	129
Gray	20	23	161	244
Grayson	30	134	543	772
Gregg	58	272	497	1,002
Grimes	21	33	134	188
Guadalupe	46	192	318	648
Hale	5	66	132	259
Hamilton	0	18	0	18
Hardin	14	78	186	278
Harris	1,319	7,664	34,431	45,664
Harrison	12	61	241	324
Hays	97	348	1,814	2,482
Hemphill	6	20	30	64
Henderson	44	147	416	671
Hidalgo	265	1,289	3,554	5,511
Hill	13	35	178	250
Hockley	10	8	120	150
Hood	0	0	50	121
Hopkins	10	50	94	184
Houston	19	42	145	210
Howard	13	67	252	332

Program and Portfolio Analysis County Supplement

<b>County</b>	<b>ELI</b>	<b>VLI</b>	<b>LI</b>	<b>Total Units</b>
Hunt	9	112	438	598
Hutchinson	31	31	80	144
Jack	0	24	52	76
Jackson	0	18	38	56
Jasper	8	0	156	168
Jefferson	224	863	3,156	4,553
Jim Hogg	0	0	20	24
Jim Wells	16	24	180	220
Johnson	60	502	923	1,671
Karnes	8	52	48	132
Kaufman	21	281	668	1,066
Kendall	3	101	333	437
Kerr	38	51	309	401
Kimble	3	9	18	30
Kinney	0	0	32	32
Kleberg	19	164	293	478
La Salle	9	0	91	116
Lamar	6	139	161	344
Lamb	0	0	33	68
Lampasas	8	19	121	148
Lavaca	2	20	42	64
Lee	10	27	98	136
Leon	4	6	14	24
Liberty	40	80	362	536
Limestone	16	29	155	200
Live Oak	4	19	78	108
Llano	11	66	246	338
Lubbock	99	645	1,472	2,386
Lynn	0	0	0	24
Madison	4	14	66	84
Marion	0	10	14	24
Matagorda	11	18	193	226
Maverick	29	45	246	320
Mcculloch	2	41	33	76
Mclennan	96	270	873	1,355
Medina	16	17	183	220
Menard	0	0	24	24

Program and Portfolio Analysis County Supplement

<b>County</b>	<b>ELI</b>	<b>VLI</b>	<b>LI</b>	<b>Total Units</b>
Midland	41	314	874	1,466
Milam	8	62	109	236
Mills	5	18	1	24
Mitchell	0	10	46	61
Montague	5	34	111	156
Montgomery	122	451	3,415	4,127
Moore	5	11	44	64
Morris	2	5	41	60
Nacogdoches	62	149	571	816
Navarro	6	78	86	184
Newton	0	0	23	24
Nolan	8	0	72	86
Nueces	170	651	2,131	3,117
Ochiltree	5	16	27	48
Orange	45	130	844	1,029
Palo Pinto	24	64	179	267
Panola	7	14	35	82
Parker	8	114	290	446
Pecos	0	17	171	188
Polk	0	15	95	110
Potter	41	248	1,308	1,748
Presidio	0	0	54	54
Rains	4	10	36	56
Randall	15	59	234	311
Reagan	0	0	20	20
Red River	0	0	82	96
Reeves	9	10	74	104
Refugio	0	4	42	68
Robertson	0	5	35	40
Rockwall	15	43	115	173
Rusk	0	0	100	100
Sabine	0	6	26	32
San Augustine	0	7	29	36
San Jacinto	14	34	80	128
San Patricio	12	124	312	518
Schleicher	0	16	16	32
Scurry	12	40	28	80



Program and Portfolio Analysis County Supplement

<b>County</b>	<b>ELI</b>	<b>VLI</b>	<b>LI</b>	<b>Total Units</b>
Shackelford	3	12	25	40
Shelby	3	40	75	118
Smith	85	322	1,330	1,854
Somervell	0	0	20	20
Starr	10	38	162	227
Stephens	0	0	56	56
Sutton	0	13	51	64
Tarrant	469	2,508	13,291	17,966
Taylor	75	228	849	1,191
Terry	0	17	55	72
Titus	7	0	105	112
Tom Green	16	170	446	632
Travis	434	2,341	10,413	14,266
Trinity	3	7	58	68
Upshur	0	0	78	78
Uvalde	10	26	104	140
Val Verde	11	111	158	281
Van Zandt	14	36	265	330
Victoria	31	165	580	876
Walker	28	115	405	569
Waller	4	125	311	491
Ward	5	9	30	49
Washington	10	70	186	272
Webb	21	362	629	1,097
Wharton	18	48	158	232
Wichita	44	340	706	1,101
Wilbarger	10	23	96	132
Willacy	3	30	83	126
Williamson	170	784	2,553	4,258
Wilson	8	51	110	218
Wise	0	43	95	224
Wood	5	11	134	182
Yoakum	0	0	0	3
Young	0	20	44	88
Zapata	7	0	57	73
Zavala	0	30	30	60
<b>Grand Total</b>	<b>8,129</b>	<b>39,646</b>	<b>163,545</b>	<b>231,010</b>

## Program and Portfolio Analysis County Supplement

Source: TDHCA Central Database, May 2017

Note, this analysis is for all MF, including HTCs. Federal funds on MF deals are typically layered and we cannot distinguish the race/ethnicity and unit features for HOME units, etc.

## Appendix G - Mortgage Lending Supplemental Table

Figure G-1: Loan Approvals and Denials by Race, Ethnicity, and Income Bands

Primary Applicant Ethnicity	Primary Applicant Race	Percent of FFIEC Median Income	Approvals	Denials	Percent of Loans Denied
Hispanic or Latino	American Indian or Alaskan Native	30% and Below	4	31	88.6%
Hispanic or Latino	Asian	30% and Below	-	2	100.0%
Hispanic or Latino	Black or African American	30% and Below	-	18	100.0%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	30% and Below	-	4	100.0%
Hispanic or Latino	White	30% and Below	336	1,807	84.3%
Not Hispanic or Latino	American Indian or Alaskan Native	30% and Below	3	25	89.3%
Not Hispanic or Latino	Asian	30% and Below	62	112	64.4%
Not Hispanic or Latino	Black or African American	30% and Below	60	349	85.3%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	30% and Below	3	8	72.7%
Not Hispanic or Latino	White	30% and Below	406	1,881	82.2%
Hispanic or Latino	American Indian or Alaskan Native	30%-50%	48	42	46.7%
Hispanic or Latino	Asian	30%-50%	11	5	31.3%
Hispanic or Latino	Black or African American	30%-50%	16	20	55.6%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	30%-50%	20	12	37.5%
Hispanic or Latino	White	30%-50%	4,272	1,807	29.7%
Not Hispanic or Latino	American Indian or Alaskan Native	30%-50%	23	30	56.6%
Not Hispanic or Latino	Asian	30%-50%	589	240	29.0%
Not Hispanic or Latino	Black or African American	30%-50%	635	526	45.3%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	30%-50%	13	9	40.9%
Not Hispanic or Latino	White	30%-50%	3,651	1,804	33.1%
Hispanic or Latino	American Indian or Alaskan Native	50%-100%	255	87	25.4%
Hispanic or Latino	Asian	50%-100%	75	11	12.8%
Hispanic or Latino	Black or African American	50%-100%	205	61	22.9%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	50%-100%	152	30	16.5%
Hispanic or Latino	White	50%-100%	24,736	5,360	17.8%
Not Hispanic or Latino	American Indian or Alaskan Native	50%-100%	358	92	20.4%
Not Hispanic or Latino	Asian	50%-100%	4,798	797	14.2%
Not Hispanic or Latino	Black or African American	50%-100%	7,535	2,141	22.1%

Mortgage Lending Supplemental Table

Primary Applicant Ethnicity	Primary Applicant Race	Percent of FFIEC Median Income	Approvals	Denials	Percent of Loans Denied
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	50%-100%	199	35	15.0%
Not Hispanic or Latino	White	50%-100%	42,532	6,738	13.7%
Hispanic or Latino	American Indian or Alaskan Native	100%-150%	188	33	14.9%
Hispanic or Latino	Asian	100%-150%	68	7	9.3%
Hispanic or Latino	Black or African American	100%-150%	150	29	16.2%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	100%-150%	117	15	11.4%
Hispanic or Latino	White	100%-150%	16,907	2,599	13.3%
Not Hispanic or Latino	American Indian or Alaskan Native	100%-150%	371	53	12.5%
Not Hispanic or Latino	Asian	100%-150%	5,771	640	10.0%
Not Hispanic or Latino	Black or African American	100%-150%	6,568	1,260	16.1%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	100%-150%	206	35	14.5%
Not Hispanic or Latino	White	100%-150%	46,498	4,536	8.9%
Hispanic or Latino	American Indian or Alaskan Native	150%-200%	80	4	4.8%
Hispanic or Latino	Asian	150%-200%	49	3	5.8%
Hispanic or Latino	Black or African American	150%-200%	86	6	6.5%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	150%-200%	49	10	16.9%
Hispanic or Latino	White	150%-200%	8,320	1,054	11.2%
Not Hispanic or Latino	American Indian or Alaskan Native	150%-200%	265	32	10.8%
Not Hispanic or Latino	Asian	150%-200%	4,656	432	8.5%
Not Hispanic or Latino	Black or African American	150%-200%	3,608	570	13.6%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	150%-200%	160	12	7.0%
Not Hispanic or Latino	White	150%-200%	32,181	2,742	7.9%
Hispanic or Latino	American Indian or Alaskan Native	200%-300%	46	8	14.8%
Hispanic or Latino	Asian	200%-300%	33	5	13.2%
Hispanic or Latino	Black or African American	200%-300%	39	2	4.9%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	200%-300%	42	4	8.7%
Hispanic or Latino	White	200%-300%	5,512	698	11.2%
Not Hispanic or Latino	American Indian or Alaskan Native	200%-300%	179	26	12.7%
Not Hispanic or Latino	Asian	200%-300%	3,877	384	9.0%
Not Hispanic or Latino	Black or African American	200%-300%	2,220	348	13.6%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	200%-300%	111	7	5.9%
Not Hispanic or Latino	White	200%-300%	28,229	2,330	7.6%

Mortgage Lending Supplemental Table

Primary Applicant Ethnicity	Primary Applicant Race	Percent of FFIEC Median Income	Approvals	Denials	Percent of Loans Denied
Hispanic or Latino	American Indian or Alaskan Native	Above 300%	16	5	23.8%
Hispanic or Latino	Asian	Above 300%	14	3	17.6%
Hispanic or Latino	Black or African American	Above 300%	19	8	29.6%
Hispanic or Latino	Native Hawaiian or Other Pacific Islander	Above 300%	18	5	21.7%
Hispanic or Latino	White	Above 300%	2,637	417	13.7%
Not Hispanic or Latino	American Indian or Alaskan Native	Above 300%	69	16	18.8%
Not Hispanic or Latino	Asian	Above 300%	2,425	334	12.1%
Not Hispanic or Latino	Black or African American	Above 300%	883	187	17.5%
Not Hispanic or Latino	Native Hawaiian or Other Pacific Islander	Above 300%	47	8	14.5%
Not Hispanic or Latino	White	Above 300%	19,074	1,980	9.4%

Source: Home Mortgage Disclosure Act Data, 2016.

Note: Includes only final decisions by a financial institution on loan applications for home purchase loans.

## Appendix H - Texas Community Development Block Grant

### TxCDBG Implementation Manual, Chapter 10 Excerpt

**Designate a Civil Rights Officer (CRO) to serve as the Grant Recipient's Section 504 Coordinator, Equal Opportunity Officer, and Fair Housing Officer.**

Grant Recipients should prepare and adopt written policies, plans, and/or resolutions/proclamations/ordinances regarding the following:

- **Non-discrimination/Equal Opportunity (EO)** – Review existing local employment policies and include the EO policy in your local government policy manual/handbook. Ensure job postings and applications state that Grant Recipient or contractor is an Equal Opportunity Employer (See *Equal Opportunity Guidelines for Construction Contractors Form A1001*). Include an equal opportunity provision in all construction contracts (including administration and engineering contracts associated with construction) greater than \$10,000. (See 41 CFR 60-1.4(b))
- **Section 3 Economic Opportunity (Section 3)** – Adopt policy/plan based on the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended (see *Sample Section 3 Policy Form A1002*) and make available to the public. Sec. 3 applies to all TxCDBG projects. Section 3 goals are: 1) 30% of new hires should be Section 3 residents; 2) 10% construction should be awarded to Section 3 businesses; and 3) 3% of non-construction should be awarded to Section 3 businesses. All contractors (or subcontractors) receiving covered funds in excess of \$100,000 to complete projects involving housing construction, rehabilitation, or other public construction are required to comply with the requirements of Section 3 and to the greatest extent feasible meet Section 3 goals. (See *Sample Resolution Regarding Civil Rights Form A1014* and *Sample Section 3 Policy Form A1002*) Pass Resolution on Section 3.
- **Excessive force** – Adopt a policy limiting the use of excessive force during non-violent civil rights demonstration (see *Sample Resolution Regarding Civil Rights Form A1014* and *Sample Excessive Force Policy Form A1003*). Pass Resolution prohibiting Excessive Force.
- **Section 504 of the Rehabilitation Act of 1973 (Section 504)** – If Grant Recipient employs 15 or more people, adopt a policy against discrimination on the basis of disability and adopt written grievance procedures concerning Section 504. (See 24 CFR 8.53) Establish procedures for providing auxiliary aids to allow individuals with disabilities to obtain information concerning the existence and location of CDBG accessible services, activities and facilities. (See *Sample Resolution Regarding Civil Rights Form A1014* and *Sample Section 504 Policy Against Discrimination based on Handicap and Grievance Procedures Form A1004*). Pass Resolution on Section 504.
- **Affirmatively Furthering Fair Housing (AFFH)** – Best Practice: Adopt an ordinance, resolution, or proclamation based on the requirements of the Fair Housing Act to affirmatively further fair housing choice for all seven protected classes (race, color, religion, sex, disability, familial status, and national origin). Include in the policy a plan for activities that will affirmatively further fair housing in the community (AFFH activities are required by the TxCDBG contract). If an ordinance, resolution, or proclamation is passed,

plan at least one more activity during the contract term which publicizes the effort to affirmatively further fair housing, such as a fair housing booth or a through a public service announcement. *All Grant Recipients are required to complete at least one fair housing activity in addition to an ordinance/resolution/proclamation during the contract term. See notice and publication requirements per Step 6 and activity requirements per Step 10. (See Sample Resolution Regarding Civil Rights Form A1014 and Sample Fair Housing Policy Form A1015; also see Sample Fair Housing Proclamation Form A1007)*

- **Limited English Proficiency (LEP) Standards** – Establish plan for determining if there is a need for LEP services and, if applicable, how appropriate language assistance will be given. Use American FactFinder which is found at <http://factfinder.census.gov> to determine need for LEP. For written translation guidance, determine whether the size of the language group under guidance found in Section 10.2.7 of this chapter requires the translation of key documents such as Citizen Participation notices and/or other notices. (See *Limited English Proficiency Sample Plan Form A1010*)

#### **Publish Citizen Participation and Civil Rights Notices**

- **Citizen Participation and Notice of Complaints Procedures** – besides hearing requirements, publish notice that makes citizens aware of the location and hours in which they may obtain a copy of the grievance procedures and the address, phone numbers, and times for citizens to file complaints and grievances. (See *Sample Citizen Participation Plan Form A1013*);
- **Section 504** – for Grant Recipients that employ 15 or more people, identify Grant Recipient’s appointed Civil Rights Officer (CRO) by title and state, where appropriate, “that the Grant Recipient does not discriminate in admissions or access to, or treatment or employment in, its federally assisted programs and activities”. (See 24 CFR 8.54) (*Sample Notices Form A1005*); and
- **Affirmatively Furthering Fair Housing (AFFH)** – publish a notice of a passed Ordinance, Resolution, Proclamation or public service announcement. (*Sample Resolution Form A1014* and *Sample Fair Housing Policy Form A1015*; also *Sample Fair Housing Month Proclamation Form A1007*. (Also see Steps 4 and 10)

**Take action to Affirmatively Further Fair Housing** - Plan at least one activity within the contract term to Affirmatively Further Fair Housing. (See *Fair Housing Month Proclamation Sample Form A1007* and list of activities provided in this chapter). This activity must be completed prior to receiving TxCDBG funds.

#### **10.2.6 Affirmatively Furthering Fair Housing**

Section 808(e) (5) of the Fair Housing Act 42 USC 3608(e) (5)) requires that HUD programs and activities be administered in a manner affirmatively to further the policies of the Fair Housing Act. In furtherance of this policy, Grant Recipients who receive TxCDBG funding must conduct at least one activity during the contract period to affirmatively further fair housing.

*Best practice: pass an ordinance/resolution/proclamation and conduct one fair housing activity.*

*All Grant Recipients are required to complete at least one fair housing activity in addition to an ordinance/resolution/proclamation during the contract term.*

The Fair Housing Act provides for the protection of the following federally-protected classes: race, color, religion, sex, disability, national origin, and familial status.

#### Suggested Ideas for Meeting the Fair Housing Activities Requirement

- Conduct a community-wide housing analysis to determine impediments to fair housing and implement actions to eliminate these impediments.
- If the Grant Recipient is a city, pass a fair housing ordinance. If possible, include a penalty clause in the ordinance. Also, publicize the existence of such an ordinance (e.g., newspaper advertisement, or fliers enclosed in utility bills). Grant Recipients should consult with their county/city attorney or contact the applicable trade association (Texas Municipal League) for a sample fair housing ordinance.
- If the Grant Recipient is a county, adopt written fair housing policies and procedures that are equivalent to a fair housing ordinance and publicize the existence of the policies/procedures (e.g., newspaper advertisement). Grant Recipients should consult with their county/city attorney or contact the applicable trade association (Texas Association of Counties) for a sample fair housing policy.
- Sponsor or fund fair housing counseling/referral services for owners and renters.
- Have a written local complaint and monitoring process and notify the public of its existence through newspaper advertisements, or through notices in utility statements.
- Promote housing opportunities outside historically minority and/or low and moderate-income neighborhoods.
- Designate April or any other month as "Fair Housing Month" by Proclamation or Resolution along with another sponsoring activity. (Another fair housing activity must take place if this activity is chosen. See Note below.) See **Form A1007** for a *Sample Fair Housing Proclamation*.
- Conduct free training workshops on fair housing laws to homebuyers, rental property owners, and tenant organizations.
- Sponsor a poster contest or essay writing contest at local schools to educate and promote fair housing.
- Review local zoning laws and procedures to determine whether they contribute to, or detract from, fair housing choice.
- Find ways to inform builders and architects as early as possible in the project design phase, but certainly no later than the issuance of a building permit, of the need to comply with the accessibility requirements of the Fair Housing Act.

**NOTE:** National Fair Housing Month is April of each year. However, Grant Recipients may designate any month as Fair Housing Month at the local level. Designating April as "Fair Housing Month" by proclamation must be accompanied by sponsoring another activity such



as the ones listed above to support fair housing. A *Sample Fair Housing Proclamation* is provided as **Form A1007**.

### **Fair Housing Activities Resource**

HUD's Fair Housing Website at <http://www.hud.gov/groups/fairhousing.cfm> contains a wealth of information and tools for Grant Recipients to use in conducting fair housing activities. Resources on the website include:

- A fair housing planning guide;
- Fair Housing Brochures and logos;
- Fair Housing Best Practices;
- Contact information for fair housing advocacy organizations; and
- Accessibility guidelines for housing units.

TDA recognizes that in order to conduct a fair housing activity the Grant Recipient will incur costs. The Grant Recipient may elect to pay for fair housing activities and count the expenses toward the local match requirement, or submit a reimbursement request for eligible and reasonable costs to be paid by the TxCDBG grant under the General Administration line item.

**TxCDBG Implementation Manual, Section C and Form C2 Sample Guidelines**

Single-family unit(s) owned by a community based development organization (CBDO) and occupied by primarily low or moderate income persons will be eligible for assistance.

- A single family structure is defined as 1 to 4 units; only the units occupied by LMI persons are eligible for assistance.
- The CBDO must sign a letter of commitment to maintain the housing units for residents that meet eligibility criteria of both CDBG and the CBDO for a minimum of five years.
- A CBDO must meet the definition found in the Housing and Community Development Act of 1974, as Amended, Section 105(a)(15):
  - neighborhood-based nonprofit organizations,
  - local development corporations,
  - nonprofit organizations serving the development needs of the communities in non-entitlement areas,
  - entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out a neighborhood revitalization or community economic development or energy conservation project in furtherance of the objectives of section 101(c) of this title, and
  - nonprofit organizations assisting the development of shared housing opportunities (other than by construction of new facilities) for elderly families.

## Appendix I - TDHCA Tenant Survey Results

Note that in the Resident Survey conducted in 2017, questions were asked about housing impediments, and what considerations matter to residents, among other considerations. In the survey, respondents were asked, “If you could have your dream home, would you keep your home in your current neighborhood or would you move your home to another part of town?” In this question, more than half of the respondents indicated they preferred their present neighborhood.

**Figure I-1: Tenant Survey Neighborhood Preference**

Neighborhood Preference	Number	Percent
Same Neighborhood	345	58%
Different Neighborhood	252	42%
Total	597	100%

Survey respondents were also asked about their preferences of the place they live in. In one question, respondents were asked which neighborhood features were important to them. Respondents were later asked whether they have children or persons with disabilities in the household. Figure I-2 shows the breakdown of the various neighborhood features that respondents indicated were important for respondents with persons with disabilities in the household and for respondents with children in the household.

**Figure I-2: Tenant Survey Importance of Neighborhood Features**

Importance of a Neighborhood Feature	Percent of Respondents with Person with Disabilities in Household That Indicate This Feature Is Important	Percent of Respondents with Children Present That Indicate This Feature Is Important
Being near a grocery store, pharmacy, etc.	95%	90%
Being near recreational places like a park, jogging path, or gym	57%	81%
School quality	27%	88%
Being near health care providers, like a doctor or clinic	92%	89%
Being near your job or other employment opportunities	26%	74%
Attractiveness of neighborhood (no trash or abandoned buildings)	91%	96%
Being near public transportation	60%	60%
Safety of neighborhood	98%	98%
Being near friends and family	81%	74%
Being near to your child care facility	18%	62%
Being near organizations, such as your church	69%	64%
Continuing education opportunities to get new job skills, like community college or training center	26%	57%

## TDHCA Tenant Survey Results

The responses showed the following:

- Survey respondents indicated which neighborhood features were important to them.
- All four Clusters agree on top 5 most important features—grocery store/consumer amenities, healthcare providers, the attractiveness of the neighborhood (no blight), the safety of the neighborhood, and being near family and friends.
- Another group of respondents—Households with Children—largely agreed with the four Clusters, but also had school quality in their top 5 most important neighborhood features.
- When asked to identify the top three of those neighborhood features selected as important, respondents picked

- 1) Safety of neighborhood
- 2) Being near a grocery store, pharmacy, etc.
- 3) Being near health care providers.

When it comes to housing choice, respondents were asked, “If you could have your dream home, would you keep your home in your current neighborhood or would you move your home to another part of town?” Respondents were then asked a series of questions that asked them to reflect on the qualities of good and bad neighborhoods.

When it comes to accessibility, 207 out of 255 respondents with persons of disabilities in the household indicated that they find “My home is accessible for people with disabilities” to be an important consideration. Moreover, the majority of the respondents with persons of disabilities in the household were satisfied or very satisfied with the consideration as to whether their home is accessible.

**Figure I-3: Tenant Survey Satisfaction with Accessibility of Housing**

Responses	Count	Percentage
Very satisfied	187	34%
Satisfied	204	37%
Neutral	100	18%
Dissatisfied	39	7%
Very Dissatisfied	18	3%
Total	548	100%

Transportation is a significant consideration for persons with disabilities. When respondents with persons of disabilities in the household were asked about the importance of transportation services as a tenant amenity or feature, 57% ranked transportation services among the top two of five possible tenant services in the question.

**Figure I-4: Tenant Survey Importance of Transportation**

Rank Importance of Transportation Services	Count	Percentage
1	83	36%
2	49	21%
3	55	24%
4	18	8%
5	26	11%

Note: Percentages may not add to 100 due to rounding

When respondents with children in the household were asked about the importance of childcare, summer camps, and tutoring services as a tenant service choice, nearly half indicated this service to be most important or second most important (the low response rate may have affected this breakdown):

**Figure I-5: Tenant Survey Importance of Childcare and Child Services**

Rank Importance of Childcare, Camps and Tutoring Services	Count	Percentage
1	21	25%
2	20	24%
3	10	12%
4	18	22%
5	14	17%

Note: Percentages may not add to 100 due to rounding

The response breakdown for the entire question is shown in Figure I-6, with the most important tenant services for respondents shown in percentages by type of tenant services and type of respondents.

**Figure I-6: Tenant Survey Service Ranked as Most Important**

Type of Respondent	Transportation Services	Community and Social Interaction Services	Education and Job Training for Adults	Education Services for Children	Health & Wellness Services
Cluster 1	28%	16%	9%	13%	34%
Cluster 2	32%	16%	7%	13%	32%
Cluster 3	38%	21%	2%	1%	38%
Cluster 4	36%	13%	4%	11%	36%
Persons with Disabilities in Household	52%	50%	16%	11%	53%
Children Present	26%	13%	9%	26%	27%

Cluster 1: Family Households at 60% AMFI (non-rural); Cluster 2: Households between 30-60% AMFI; Elderly and Families (non-rural); Cluster 3: Elderly Households (non-rural); Cluster 4: Households in Rural Developments.

## TDHCA Tenant Survey Results

Survey respondents ranked categories of residential services, with 1 being the most important and 5 being the least important. The distribution of services identified as being most important (#1) are shown in the table above. For all four Clusters, Transportation Services and Health & Wellness Services are identified as most important. This seems logical given the high proportion of Elderly within the respondent pool. Another group of respondents—Households with Children—agreed with the four Clusters that Health & Wellness Services should be in the top two types of services, but also identified Education Services for Children as the most important.

## Appendix J - Disaster Recovery Supplements

**Figure J-1: CDBG-DR Eligible Counties in Texas**

County
Austin
Aransas
Bastrop
Bee
Brazoria
Burleson
Caldwell
Calhoun
Chambers
Colorado
Comal
DeWitt
Fayette
Fort Bend
Galveston
Goliad
Gonzales

County
Grimes
Guadalupe
Hardin
Harris
Jackson
Jasper
Jefferson
Jim Wells
Karnes
Kleberg
Lavaca
Lee
Liberty
Madison
Matagorda
Milam
Montgomery

County
Newton
Nueces
Orange
Polk
Refugio
Sabine
San Augustine
San Jacinto
San Patricio
Tyler
Victoria
Walker
Waller
Washington
Wharton

Source: Appendix A of the CDBG-DR State Plan.

<[http://texasrebuilds.org/Documents/Harvey%20Action%20Plan%20Round%201%20-%20HUD%20Approved%206-25-18\\_.pdf](http://texasrebuilds.org/Documents/Harvey%20Action%20Plan%20Round%201%20-%20HUD%20Approved%206-25-18_.pdf)>

**Figure J-2: Texas Division of Emergency Management Preparedness Unit Regions**

TDEM Region	County	TDEM Region	County
1	Anderson	1	Titus
1	Bowie	1	Upshur
1	Camp	1	Van Zandt
1	Cass	1	Wise
1	Cherokee	1	Wood
1	Collin	2	Angelina
1	Cooke	2	Austin
1	Dallas	2	Brazoria
1	Delta	2	Brazos
1	Denton	2	Burleson
1	Ellis	2	Chambers
1	Erath	2	Colorado
1	Fannin	2	Fort Bend
1	Franklin	2	Galveston
1	Grayson	2	Grimes
1	Gregg	2	Hardin
1	Harrison	2	Harris
1	Henderson	2	Houston
1	Hood	2	Jasper
1	Hopkins	2	Jefferson
1	Hunt	2	Leon
1	Johnson	2	Liberty
1	Kaufman	2	Madison
1	Lamar	2	Matagorda
1	Marion	2	Montgomery
1	Morris	2	Nacogdoches
1	Panola	2	Newton
1	Navarro	2	Orange
1	Palo Pinto	2	Polk
1	Parker	2	Robertson
1	Rains	2	Sabine
1	Red River	2	San Augustine
1	Rockwall	2	San Jacinto
1	Rusk	2	Shelby
1	Smith	2	Trinity
1	Somervell	2	Tyler
1	Tarrant	2	Walker



Disaster Recovery Supplements

TDEM Region	County
2	Waller
2	Washington
2	Wharton
3	Aransas
3	Bee
3	Brooks
3	Cameron
3	Dimmit
3	Duval
3	Edwards
3	Hidalgo
3	Jim Hogg
3	Jim Wells
3	Kenedy
3	Kinney
3	Kleberg
3	LaSalle
3	Live Oak
3	Maverick
3	Nueces
3	Real
3	Refugio
3	San Patricio
3	Starr
3	Webb
3	Willacy
3	Uvalde
3	Val Verde
3	Zapata
3	Zavala
4	Andrews
4	Borden
4	Brewster
4	Coke
4	Concho
4	Crane
4	Crockett
4	Culberson

TDEM Region	County
4	Dawson
4	Ector
4	El Paso
4	Gaines
4	Glasscock
4	Howard
4	Hudspeth
4	Irion
4	Jeff Davis
4	Kimble
4	Loving
4	Mason
4	Martin
4	McCulloch
4	Menard
4	Midland
4	Pecos
4	Presidio
4	Reagan
4	Reeves
4	Schleicher
4	Sterling
4	Sutton
4	Terrell
4	Tom Green
4	Upton
4	Ward
4	Winkler
5	Archer
5	Armstrong
5	Bailey
5	Baylor
5	Briscoe
5	Brown
5	Callahan
5	Carson
5	Castro
5	Clay

Disaster Recovery Supplements

TDEM Region	County
5	Childress
5	Cochran
5	Coleman
5	Collingsworth
5	Comanche
5	Cottle
5	Crosby
5	Dallam
5	Deaf Smith
5	Dickens
5	Donley
5	Eastland
5	Fisher
5	Floyd
5	Foard
5	Garza
5	Gray
5	Hale
5	Hall
5	Hansford
5	Hardeman
5	Hartley
5	Haskell
5	Hemphill
5	Hockley
5	Hutchinson
5	Jack
5	Jones
5	Kent
5	King
5	Knox
5	Lamb
5	Lipscomb
5	Lubbock
5	Lynn
5	Mitchell
5	Montague
5	Moore

TDEM Region	County
5	Motley
5	Nolan
5	Ochiltree
5	Oldham
5	Parmer
5	Potter
5	Randall
5	Roberts
5	Runnels
5	Scurry
5	Shackelford
5	Sherman
5	Stephens
5	Stonewall
5	Swisher
5	Taylor
5	Terry
5	Throckmorton
5	Wheeler
5	Wichita
5	Wilbarger
5	Yoakum
5	Young
6	Atascosa
6	Bandera
6	Bastrop
6	Bell
6	Bexar
6	Blanco
6	Bosque
6	Burnet
6	Caldwell
6	Calhoun
6	Comal
6	Coryell
6	DeWitt
6	Falls
6	Fayette

## Disaster Recovery Supplements

<b>TDEM Region</b>	<b>County</b>
6	Freestone
6	Frio
6	Gillespie
6	Goliad
6	Gonzales
6	Guadalupe
6	Hamilton
6	Hays
6	Hill
6	Jackson
6	Karnes
6	Kendall
6	Kerr
6	Lampasas
6	Lavaca
6	Lee
6	Limestone
6	Llano
6	McMullen
6	Medina
6	Milam
6	Mills
6	McLennan
6	San Saba
6	Travis
6	Victoria
6	Williamson
6	Wilson

Source: Texas Department of Public Safety, Texas Division of Emergency Management.

<<http://www.dps.texas.gov/dem/DDC/districtMap.htm>>

Disaster Recovery Supplements

**Figure J-3: Low or Moderate Income in Census Block Groups in Texas, 2017**

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480079501001	Block Group 1, Census Tract 9501, Aransas County, Texas	42.1%
480079501002	Block Group 2, Census Tract 9501, Aransas County, Texas	34.9%
480079501003	Block Group 3, Census Tract 9501, Aransas County, Texas	42.9%
480079501004	Block Group 4, Census Tract 9501, Aransas County, Texas	46.1%
480079501005	Block Group 5, Census Tract 9501, Aransas County, Texas	46.4%
480079502001	Block Group 1, Census Tract 9502, Aransas County, Texas	17.4%
480079502002	Block Group 2, Census Tract 9502, Aransas County, Texas	14.9%
480079503001	Block Group 1, Census Tract 9503, Aransas County, Texas	31.4%
480079503002	Block Group 2, Census Tract 9503, Aransas County, Texas	27.0%
480079503003	Block Group 3, Census Tract 9503, Aransas County, Texas	57.0%
480079503004	Block Group 4, Census Tract 9503, Aransas County, Texas	57.5%
480079504001	Block Group 1, Census Tract 9504, Aransas County, Texas	70.5%
480079504002	Block Group 2, Census Tract 9504, Aransas County, Texas	28.7%
480079504003	Block Group 3, Census Tract 9504, Aransas County, Texas	31.7%
480079505001	Block Group 1, Census Tract 9505, Aransas County, Texas	26.9%
480079505002	Block Group 2, Census Tract 9505, Aransas County, Texas	30.8%
480079505003	Block Group 3, Census Tract 9505, Aransas County, Texas	53.8%
480079505004	Block Group 4, Census Tract 9505, Aransas County, Texas	32.3%
480079900000	Block Group 0, Census Tract 9900, Aransas County, Texas	0.0%
480157601001	Block Group 1, Census Tract 7601, Austin County, Texas	59.3%
480157601002	Block Group 2, Census Tract 7601, Austin County, Texas	58.8%
480157602001	Block Group 1, Census Tract 7602, Austin County, Texas	59.5%
480157602002	Block Group 2, Census Tract 7602, Austin County, Texas	13.8%
480157602003	Block Group 3, Census Tract 7602, Austin County, Texas	32.8%
480157602004	Block Group 4, Census Tract 7602, Austin County, Texas	58.6%
480157603001	Block Group 1, Census Tract 7603, Austin County, Texas	27.7%
480157603002	Block Group 2, Census Tract 7603, Austin County, Texas	34.9%
480157603003	Block Group 3, Census Tract 7603, Austin County, Texas	34.4%
480157603004	Block Group 4, Census Tract 7603, Austin County, Texas	36.7%
480157604001	Block Group 1, Census Tract 7604, Austin County, Texas	25.1%
480157604002	Block Group 2, Census Tract 7604, Austin County, Texas	28.0%
480157604003	Block Group 3, Census Tract 7604, Austin County, Texas	32.5%
480157605011	Block Group 1, Census Tract 7605.01, Austin County, Texas	22.1%
480157605012	Block Group 2, Census Tract 7605.01, Austin County, Texas	16.6%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480157605013	Block Group 3, Census Tract 7605.01, Austin County, Texas	16.7%
480157605021	Block Group 1, Census Tract 7605.02, Austin County, Texas	37.4%
480157605022	Block Group 2, Census Tract 7605.02, Austin County, Texas	67.0%
480157605023	Block Group 3, Census Tract 7605.02, Austin County, Texas	31.0%
480157605024	Block Group 4, Census Tract 7605.02, Austin County, Texas	49.4%
480219501001	Block Group 1, Census Tract 9501, Bastrop County, Texas	59.3%
480219501002	Block Group 2, Census Tract 9501, Bastrop County, Texas	37.9%
480219501003	Block Group 3, Census Tract 9501, Bastrop County, Texas	67.3%
480219501004	Block Group 4, Census Tract 9501, Bastrop County, Texas	31.0%
480219501005	Block Group 5, Census Tract 9501, Bastrop County, Texas	41.5%
480219502001	Block Group 1, Census Tract 9502, Bastrop County, Texas	14.2%
480219502002	Block Group 2, Census Tract 9502, Bastrop County, Texas	35.6%
480219502003	Block Group 3, Census Tract 9502, Bastrop County, Texas	79.8%
480219502004	Block Group 4, Census Tract 9502, Bastrop County, Texas	57.7%
480219502005	Block Group 5, Census Tract 9502, Bastrop County, Texas	63.9%
480219503001	Block Group 1, Census Tract 9503, Bastrop County, Texas	26.7%
480219503002	Block Group 2, Census Tract 9503, Bastrop County, Texas	26.2%
480219503003	Block Group 3, Census Tract 9503, Bastrop County, Texas	54.4%
480219503004	Block Group 4, Census Tract 9503, Bastrop County, Texas	21.0%
480219503005	Block Group 5, Census Tract 9503, Bastrop County, Texas	36.6%
480219504001	Block Group 1, Census Tract 9504, Bastrop County, Texas	66.4%
480219504002	Block Group 2, Census Tract 9504, Bastrop County, Texas	33.0%
480219504003	Block Group 3, Census Tract 9504, Bastrop County, Texas	49.8%
480219504004	Block Group 4, Census Tract 9504, Bastrop County, Texas	49.5%
480219504005	Block Group 5, Census Tract 9504, Bastrop County, Texas	29.8%
480219505011	Block Group 1, Census Tract 9505.01, Bastrop County, Texas	62.3%
480219505012	Block Group 2, Census Tract 9505.01, Bastrop County, Texas	39.0%
480219505013	Block Group 3, Census Tract 9505.01, Bastrop County, Texas	45.4%
480219505021	Block Group 1, Census Tract 9505.02, Bastrop County, Texas	41.4%
480219505022	Block Group 2, Census Tract 9505.02, Bastrop County, Texas	45.8%
480219505023	Block Group 3, Census Tract 9505.02, Bastrop County, Texas	29.5%
480219506001	Block Group 1, Census Tract 9506, Bastrop County, Texas	55.5%
480219506002	Block Group 2, Census Tract 9506, Bastrop County, Texas	59.9%
480219506003	Block Group 3, Census Tract 9506, Bastrop County, Texas	41.1%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480219507001	Block Group 1, Census Tract 9507, Bastrop County, Texas	61.5%
480219507002	Block Group 2, Census Tract 9507, Bastrop County, Texas	50.0%
480219507003	Block Group 3, Census Tract 9507, Bastrop County, Texas	38.7%
480219507004	Block Group 4, Census Tract 9507, Bastrop County, Texas	85.8%
480219508011	Block Group 1, Census Tract 9508.01, Bastrop County, Texas	87.7%
480219508012	Block Group 2, Census Tract 9508.01, Bastrop County, Texas	29.3%
480219508013	Block Group 3, Census Tract 9508.01, Bastrop County, Texas	77.6%
480219508021	Block Group 1, Census Tract 9508.02, Bastrop County, Texas	61.0%
480219508022	Block Group 2, Census Tract 9508.02, Bastrop County, Texas	48.2%
480219508023	Block Group 3, Census Tract 9508.02, Bastrop County, Texas	37.4%
480259501001	Block Group 1, Census Tract 9501, Bee County, Texas	41.2%
480259501002	Block Group 2, Census Tract 9501, Bee County, Texas	31.4%
480259502011	Block Group 1, Census Tract 9502.01, Bee County, Texas	0.0%
480259502012	Block Group 2, Census Tract 9502.01, Bee County, Texas	0.0%
480259502013	Block Group 3, Census Tract 9502.01, Bee County, Texas	31.9%
480259502021	Block Group 1, Census Tract 9502.02, Bee County, Texas	50.9%
480259502022	Block Group 2, Census Tract 9502.02, Bee County, Texas	42.9%
480259502023	Block Group 3, Census Tract 9502.02, Bee County, Texas	10.9%
480259502024	Block Group 4, Census Tract 9502.02, Bee County, Texas	26.2%
480259503001	Block Group 1, Census Tract 9503, Bee County, Texas	25.6%
480259503002	Block Group 2, Census Tract 9503, Bee County, Texas	33.2%
480259503003	Block Group 3, Census Tract 9503, Bee County, Texas	32.6%
480259503004	Block Group 4, Census Tract 9503, Bee County, Texas	49.5%
480259503005	Block Group 5, Census Tract 9503, Bee County, Texas	68.2%
480259504001	Block Group 1, Census Tract 9504, Bee County, Texas	48.2%
480259504002	Block Group 2, Census Tract 9504, Bee County, Texas	38.5%
480259505001	Block Group 1, Census Tract 9505, Bee County, Texas	53.3%
480259505002	Block Group 2, Census Tract 9505, Bee County, Texas	36.2%
480259505003	Block Group 3, Census Tract 9505, Bee County, Texas	73.5%
480259505004	Block Group 4, Census Tract 9505, Bee County, Texas	65.5%
480259505005	Block Group 5, Census Tract 9505, Bee County, Texas	47.2%
480259505006	Block Group 6, Census Tract 9505, Bee County, Texas	49.0%
480259505007	Block Group 7, Census Tract 9505, Bee County, Texas	63.6%
480259506001	Block Group 1, Census Tract 9506, Bee County, Texas	36.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480396601001	Block Group 1, Census Tract 6601, Brazoria County, Texas	13.1%
480396601002	Block Group 2, Census Tract 6601, Brazoria County, Texas	19.4%
480396601003	Block Group 3, Census Tract 6601, Brazoria County, Texas	22.8%
480396602001	Block Group 1, Census Tract 6602, Brazoria County, Texas	44.6%
480396602002	Block Group 2, Census Tract 6602, Brazoria County, Texas	23.4%
480396602003	Block Group 3, Census Tract 6602, Brazoria County, Texas	22.2%
480396603001	Block Group 1, Census Tract 6603, Brazoria County, Texas	67.8%
480396603002	Block Group 2, Census Tract 6603, Brazoria County, Texas	34.3%
480396603003	Block Group 3, Census Tract 6603, Brazoria County, Texas	16.8%
480396604001	Block Group 1, Census Tract 6604, Brazoria County, Texas	26.3%
480396604002	Block Group 2, Census Tract 6604, Brazoria County, Texas	34.6%
480396604003	Block Group 3, Census Tract 6604, Brazoria County, Texas	28.5%
480396605001	Block Group 1, Census Tract 6605, Brazoria County, Texas	29.1%
480396605002	Block Group 2, Census Tract 6605, Brazoria County, Texas	54.1%
480396605003	Block Group 3, Census Tract 6605, Brazoria County, Texas	30.2%
480396605004	Block Group 4, Census Tract 6605, Brazoria County, Texas	43.5%
480396605005	Block Group 5, Census Tract 6605, Brazoria County, Texas	41.2%
480396605006	Block Group 6, Census Tract 6605, Brazoria County, Texas	46.9%
480396606011	Block Group 1, Census Tract 6606.01, Brazoria County, Texas	10.9%
480396606012	Block Group 2, Census Tract 6606.01, Brazoria County, Texas	23.4%
480396606013	Block Group 3, Census Tract 6606.01, Brazoria County, Texas	22.8%
480396606014	Block Group 4, Census Tract 6606.01, Brazoria County, Texas	19.3%
480396606021	Block Group 1, Census Tract 6606.02, Brazoria County, Texas	40.4%
480396606022	Block Group 2, Census Tract 6606.02, Brazoria County, Texas	14.4%
480396607011	Block Group 1, Census Tract 6607.01, Brazoria County, Texas	22.7%
480396607012	Block Group 2, Census Tract 6607.01, Brazoria County, Texas	32.4%
480396607013	Block Group 3, Census Tract 6607.01, Brazoria County, Texas	0.9%
480396607014	Block Group 4, Census Tract 6607.01, Brazoria County, Texas	13.9%
480396607015	Block Group 5, Census Tract 6607.01, Brazoria County, Texas	14.6%
480396607021	Block Group 1, Census Tract 6607.02, Brazoria County, Texas	79.9%
480396607022	Block Group 2, Census Tract 6607.02, Brazoria County, Texas	12.5%
480396607023	Block Group 3, Census Tract 6607.02, Brazoria County, Texas	54.4%
480396608011	Block Group 1, Census Tract 6608.01, Brazoria County, Texas	16.7%
480396608012	Block Group 2, Census Tract 6608.01, Brazoria County, Texas	37.3%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480396608013	Block Group 3, Census Tract 6608.01, Brazoria County, Texas	25.5%
480396608021	Block Group 1, Census Tract 6608.02, Brazoria County, Texas	20.2%
480396608022	Block Group 2, Census Tract 6608.02, Brazoria County, Texas	16.4%
480396608023	Block Group 3, Census Tract 6608.02, Brazoria County, Texas	25.5%
480396609001	Block Group 1, Census Tract 6609, Brazoria County, Texas	69.7%
480396609002	Block Group 2, Census Tract 6609, Brazoria County, Texas	27.4%
480396609003	Block Group 3, Census Tract 6609, Brazoria County, Texas	63.3%
480396609004	Block Group 4, Census Tract 6609, Brazoria County, Texas	82.1%
480396610001	Block Group 1, Census Tract 6610, Brazoria County, Texas	66.6%
480396610002	Block Group 2, Census Tract 6610, Brazoria County, Texas	51.8%
480396610003	Block Group 3, Census Tract 6610, Brazoria County, Texas	50.2%
480396611001	Block Group 1, Census Tract 6611, Brazoria County, Texas	62.0%
480396611002	Block Group 2, Census Tract 6611, Brazoria County, Texas	35.2%
480396612001	Block Group 1, Census Tract 6612, Brazoria County, Texas	68.1%
480396612002	Block Group 2, Census Tract 6612, Brazoria County, Texas	74.8%
480396612003	Block Group 3, Census Tract 6612, Brazoria County, Texas	65.6%
480396613001	Block Group 1, Census Tract 6613, Brazoria County, Texas	47.5%
480396613002	Block Group 2, Census Tract 6613, Brazoria County, Texas	97.4%
480396613003	Block Group 3, Census Tract 6613, Brazoria County, Texas	50.6%
480396614001	Block Group 1, Census Tract 6614, Brazoria County, Texas	34.9%
480396614002	Block Group 2, Census Tract 6614, Brazoria County, Texas	38.0%
480396614003	Block Group 3, Census Tract 6614, Brazoria County, Texas	57.0%
480396614004	Block Group 4, Census Tract 6614, Brazoria County, Texas	39.6%
480396614005	Block Group 5, Census Tract 6614, Brazoria County, Texas	54.4%
480396614006	Block Group 6, Census Tract 6614, Brazoria County, Texas	25.1%
480396615011	Block Group 1, Census Tract 6615.01, Brazoria County, Texas	51.5%
480396615012	Block Group 2, Census Tract 6615.01, Brazoria County, Texas	51.3%
480396615013	Block Group 3, Census Tract 6615.01, Brazoria County, Texas	43.2%
480396615021	Block Group 1, Census Tract 6615.02, Brazoria County, Texas	42.9%
480396615022	Block Group 2, Census Tract 6615.02, Brazoria County, Texas	29.4%
480396616011	Block Group 1, Census Tract 6616.01, Brazoria County, Texas	100.0%
480396616012	Block Group 2, Census Tract 6616.01, Brazoria County, Texas	45.8%
480396616013	Block Group 3, Census Tract 6616.01, Brazoria County, Texas	29.1%
480396616014	Block Group 4, Census Tract 6616.01, Brazoria County, Texas	38.9%



Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480396616021	Block Group 1, Census Tract 6616.02, Brazoria County, Texas	50.2%
480396616022	Block Group 2, Census Tract 6616.02, Brazoria County, Texas	67.3%
480396617001	Block Group 1, Census Tract 6617, Brazoria County, Texas	46.1%
480396617002	Block Group 2, Census Tract 6617, Brazoria County, Texas	35.6%
480396617003	Block Group 3, Census Tract 6617, Brazoria County, Texas	61.6%
480396618001	Block Group 1, Census Tract 6618, Brazoria County, Texas	29.5%
480396618002	Block Group 2, Census Tract 6618, Brazoria County, Texas	43.0%
480396619001	Block Group 1, Census Tract 6619, Brazoria County, Texas	40.9%
480396619002	Block Group 2, Census Tract 6619, Brazoria County, Texas	40.2%
480396619003	Block Group 3, Census Tract 6619, Brazoria County, Texas	35.4%
480396619004	Block Group 4, Census Tract 6619, Brazoria County, Texas	100.0%
480396620001	Block Group 1, Census Tract 6620, Brazoria County, Texas	36.5%
480396620002	Block Group 2, Census Tract 6620, Brazoria County, Texas	90.3%
480396620003	Block Group 3, Census Tract 6620, Brazoria County, Texas	15.0%
480396620004	Block Group 4, Census Tract 6620, Brazoria County, Texas	12.6%
480396620005	Block Group 5, Census Tract 6620, Brazoria County, Texas	49.2%
480396621001	Block Group 1, Census Tract 6621, Brazoria County, Texas	69.0%
480396621002	Block Group 2, Census Tract 6621, Brazoria County, Texas	27.1%
480396621003	Block Group 3, Census Tract 6621, Brazoria County, Texas	54.6%
480396622001	Block Group 1, Census Tract 6622, Brazoria County, Texas	25.2%
480396622002	Block Group 2, Census Tract 6622, Brazoria County, Texas	42.8%
480396622003	Block Group 3, Census Tract 6622, Brazoria County, Texas	47.7%
480396622004	Block Group 4, Census Tract 6622, Brazoria County, Texas	45.0%
480396623001	Block Group 1, Census Tract 6623, Brazoria County, Texas	40.4%
480396623002	Block Group 2, Census Tract 6623, Brazoria County, Texas	50.8%
480396623003	Block Group 3, Census Tract 6623, Brazoria County, Texas	44.8%
480396623004	Block Group 4, Census Tract 6623, Brazoria County, Texas	53.3%
480396624001	Block Group 1, Census Tract 6624, Brazoria County, Texas	31.8%
480396624002	Block Group 2, Census Tract 6624, Brazoria County, Texas	62.8%
480396624003	Block Group 3, Census Tract 6624, Brazoria County, Texas	50.5%
480396624004	Block Group 4, Census Tract 6624, Brazoria County, Texas	40.2%
480396625001	Block Group 1, Census Tract 6625, Brazoria County, Texas	17.9%
480396625002	Block Group 2, Census Tract 6625, Brazoria County, Texas	87.2%
480396626001	Block Group 1, Census Tract 6626, Brazoria County, Texas	61.1%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480396626002	Block Group 2, Census Tract 6626, Brazoria County, Texas	45.4%
480396626003	Block Group 3, Census Tract 6626, Brazoria County, Texas	39.6%
480396626004	Block Group 4, Census Tract 6626, Brazoria County, Texas	52.9%
480396627001	Block Group 1, Census Tract 6627, Brazoria County, Texas	36.1%
480396627002	Block Group 2, Census Tract 6627, Brazoria County, Texas	24.6%
480396628001	Block Group 1, Census Tract 6628, Brazoria County, Texas	60.7%
480396628002	Block Group 2, Census Tract 6628, Brazoria County, Texas	60.1%
480396628003	Block Group 3, Census Tract 6628, Brazoria County, Texas	8.1%
480396628004	Block Group 4, Census Tract 6628, Brazoria County, Texas	76.0%
480396628005	Block Group 5, Census Tract 6628, Brazoria County, Texas	39.2%
480396628006	Block Group 6, Census Tract 6628, Brazoria County, Texas	31.4%
480396629001	Block Group 1, Census Tract 6629, Brazoria County, Texas	51.2%
480396629002	Block Group 2, Census Tract 6629, Brazoria County, Texas	43.2%
480396629003	Block Group 3, Census Tract 6629, Brazoria County, Texas	46.0%
480396629004	Block Group 4, Census Tract 6629, Brazoria County, Texas	35.1%
480396630001	Block Group 1, Census Tract 6630, Brazoria County, Texas	42.2%
480396630002	Block Group 2, Census Tract 6630, Brazoria County, Texas	67.1%
480396630003	Block Group 3, Census Tract 6630, Brazoria County, Texas	0.0%
480396630004	Block Group 4, Census Tract 6630, Brazoria County, Texas	39.0%
480396631001	Block Group 1, Census Tract 6631, Brazoria County, Texas	74.5%
480396631002	Block Group 2, Census Tract 6631, Brazoria County, Texas	23.0%
480396631003	Block Group 3, Census Tract 6631, Brazoria County, Texas	0.0%
480396631004	Block Group 4, Census Tract 6631, Brazoria County, Texas	7.3%
480396632001	Block Group 1, Census Tract 6632, Brazoria County, Texas	42.4%
480396632002	Block Group 2, Census Tract 6632, Brazoria County, Texas	53.4%
480396632003	Block Group 3, Census Tract 6632, Brazoria County, Texas	11.1%
480396633001	Block Group 1, Census Tract 6633, Brazoria County, Texas	60.8%
480396633002	Block Group 2, Census Tract 6633, Brazoria County, Texas	32.6%
480396633003	Block Group 3, Census Tract 6633, Brazoria County, Texas	45.9%
480396634001	Block Group 1, Census Tract 6634, Brazoria County, Texas	29.1%
480396634002	Block Group 2, Census Tract 6634, Brazoria County, Texas	40.2%
480396634003	Block Group 3, Census Tract 6634, Brazoria County, Texas	38.0%
480396634004	Block Group 4, Census Tract 6634, Brazoria County, Texas	21.5%
480396635001	Block Group 1, Census Tract 6635, Brazoria County, Texas	40.1%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480396635002	Block Group 2, Census Tract 6635, Brazoria County, Texas	66.2%
480396635003	Block Group 3, Census Tract 6635, Brazoria County, Texas	37.4%
480396635004	Block Group 4, Census Tract 6635, Brazoria County, Texas	43.1%
480396636001	Block Group 1, Census Tract 6636, Brazoria County, Texas	10.4%
480396636002	Block Group 2, Census Tract 6636, Brazoria County, Texas	12.5%
480396636003	Block Group 3, Census Tract 6636, Brazoria County, Texas	8.0%
480396637001	Block Group 1, Census Tract 6637, Brazoria County, Texas	35.8%
480396637002	Block Group 2, Census Tract 6637, Brazoria County, Texas	17.5%
480396638001	Block Group 1, Census Tract 6638, Brazoria County, Texas	75.4%
480396638002	Block Group 2, Census Tract 6638, Brazoria County, Texas	24.3%
480396638003	Block Group 3, Census Tract 6638, Brazoria County, Texas	78.9%
480396638004	Block Group 4, Census Tract 6638, Brazoria County, Texas	42.8%
480396639001	Block Group 1, Census Tract 6639, Brazoria County, Texas	62.5%
480396639002	Block Group 2, Census Tract 6639, Brazoria County, Texas	73.1%
480396640001	Block Group 1, Census Tract 6640, Brazoria County, Texas	65.1%
480396640002	Block Group 2, Census Tract 6640, Brazoria County, Texas	45.3%
480396640003	Block Group 3, Census Tract 6640, Brazoria County, Texas	77.2%
480396641001	Block Group 1, Census Tract 6641, Brazoria County, Texas	66.9%
480396641002	Block Group 2, Census Tract 6641, Brazoria County, Texas	45.2%
480396641003	Block Group 3, Census Tract 6641, Brazoria County, Texas	48.0%
480396641004	Block Group 4, Census Tract 6641, Brazoria County, Texas	25.0%
480396641005	Block Group 5, Census Tract 6641, Brazoria County, Texas	49.8%
480396642001	Block Group 1, Census Tract 6642, Brazoria County, Texas	79.1%
480396642002	Block Group 2, Census Tract 6642, Brazoria County, Texas	52.0%
480396642003	Block Group 3, Census Tract 6642, Brazoria County, Texas	54.2%
480396643001	Block Group 1, Census Tract 6643, Brazoria County, Texas	79.2%
480396643002	Block Group 2, Census Tract 6643, Brazoria County, Texas	74.0%
480396643003	Block Group 3, Census Tract 6643, Brazoria County, Texas	56.0%
480396643004	Block Group 4, Census Tract 6643, Brazoria County, Texas	82.0%
480396643005	Block Group 5, Census Tract 6643, Brazoria County, Texas	53.9%
480396644001	Block Group 1, Census Tract 6644, Brazoria County, Texas	68.0%
480396644002	Block Group 2, Census Tract 6644, Brazoria County, Texas	37.0%
480396644003	Block Group 3, Census Tract 6644, Brazoria County, Texas	63.9%
480396644004	Block Group 4, Census Tract 6644, Brazoria County, Texas	78.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480396644005	Block Group 5, Census Tract 6644, Brazoria County, Texas	67.3%
480396644006	Block Group 6, Census Tract 6644, Brazoria County, Texas	51.7%
480396645011	Block Group 1, Census Tract 6645.01, Brazoria County, Texas	59.7%
480396645012	Block Group 2, Census Tract 6645.01, Brazoria County, Texas	42.9%
480396645013	Block Group 3, Census Tract 6645.01, Brazoria County, Texas	85.3%
480396645014	Block Group 4, Census Tract 6645.01, Brazoria County, Texas	39.6%
480396645015	Block Group 5, Census Tract 6645.01, Brazoria County, Texas	42.5%
480399900000	Block Group 0, Census Tract 9900, Brazoria County, Texas	0.0%
480519701001	Block Group 1, Census Tract 9701, Burleson County, Texas	18.8%
480519702001	Block Group 1, Census Tract 9702, Burleson County, Texas	28.3%
480519702002	Block Group 2, Census Tract 9702, Burleson County, Texas	13.8%
480519702003	Block Group 3, Census Tract 9702, Burleson County, Texas	24.3%
480519702004	Block Group 4, Census Tract 9702, Burleson County, Texas	35.0%
480519703001	Block Group 1, Census Tract 9703, Burleson County, Texas	28.8%
480519703002	Block Group 2, Census Tract 9703, Burleson County, Texas	36.1%
480519703003	Block Group 3, Census Tract 9703, Burleson County, Texas	52.5%
480519704001	Block Group 1, Census Tract 9704, Burleson County, Texas	47.3%
480519704002	Block Group 2, Census Tract 9704, Burleson County, Texas	48.2%
480519705001	Block Group 1, Census Tract 9705, Burleson County, Texas	63.6%
480519705002	Block Group 2, Census Tract 9705, Burleson County, Texas	32.4%
480519705003	Block Group 3, Census Tract 9705, Burleson County, Texas	45.4%
480519705004	Block Group 4, Census Tract 9705, Burleson County, Texas	46.2%
480559601011	Block Group 1, Census Tract 9601.01, Caldwell County, Texas	43.1%
480559601012	Block Group 2, Census Tract 9601.01, Caldwell County, Texas	46.9%
480559601013	Block Group 3, Census Tract 9601.01, Caldwell County, Texas	47.7%
480559601021	Block Group 1, Census Tract 9601.02, Caldwell County, Texas	43.8%
480559601022	Block Group 2, Census Tract 9601.02, Caldwell County, Texas	37.6%
480559602001	Block Group 1, Census Tract 9602, Caldwell County, Texas	50.0%
480559602002	Block Group 2, Census Tract 9602, Caldwell County, Texas	46.6%
480559602003	Block Group 3, Census Tract 9602, Caldwell County, Texas	62.3%
480559602004	Block Group 4, Census Tract 9602, Caldwell County, Texas	74.9%
480559603001	Block Group 1, Census Tract 9603, Caldwell County, Texas	30.4%
480559603002	Block Group 2, Census Tract 9603, Caldwell County, Texas	69.8%
480559603003	Block Group 3, Census Tract 9603, Caldwell County, Texas	49.3%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480559604001	Block Group 1, Census Tract 9604, Caldwell County, Texas	49.0%
480559604002	Block Group 2, Census Tract 9604, Caldwell County, Texas	80.8%
480559605001	Block Group 1, Census Tract 9605, Caldwell County, Texas	63.3%
480559605002	Block Group 2, Census Tract 9605, Caldwell County, Texas	65.6%
480559605003	Block Group 3, Census Tract 9605, Caldwell County, Texas	50.8%
480559605004	Block Group 4, Census Tract 9605, Caldwell County, Texas	74.2%
480559606001	Block Group 1, Census Tract 9606, Caldwell County, Texas	42.3%
480559606002	Block Group 2, Census Tract 9606, Caldwell County, Texas	50.3%
480559607001	Block Group 1, Census Tract 9607, Caldwell County, Texas	82.6%
480559607002	Block Group 2, Census Tract 9607, Caldwell County, Texas	74.4%
480559607003	Block Group 3, Census Tract 9607, Caldwell County, Texas	63.7%
480559607004	Block Group 4, Census Tract 9607, Caldwell County, Texas	35.9%
480559607005	Block Group 5, Census Tract 9607, Caldwell County, Texas	77.4%
480570001001	Block Group 1, Census Tract 1, Calhoun County, Texas	17.3%
480570001002	Block Group 2, Census Tract 1, Calhoun County, Texas	21.7%
480570001003	Block Group 3, Census Tract 1, Calhoun County, Texas	74.4%
480570002001	Block Group 1, Census Tract 2, Calhoun County, Texas	73.1%
480570002002	Block Group 2, Census Tract 2, Calhoun County, Texas	43.4%
480570002003	Block Group 3, Census Tract 2, Calhoun County, Texas	67.4%
480570002004	Block Group 4, Census Tract 2, Calhoun County, Texas	20.1%
480570003001	Block Group 1, Census Tract 3, Calhoun County, Texas	31.1%
480570003002	Block Group 2, Census Tract 3, Calhoun County, Texas	30.0%
480570004001	Block Group 1, Census Tract 4, Calhoun County, Texas	44.2%
480570004002	Block Group 2, Census Tract 4, Calhoun County, Texas	41.8%
480570004003	Block Group 3, Census Tract 4, Calhoun County, Texas	28.9%
480570004004	Block Group 4, Census Tract 4, Calhoun County, Texas	45.5%
480570005001	Block Group 1, Census Tract 5, Calhoun County, Texas	36.4%
480570005002	Block Group 2, Census Tract 5, Calhoun County, Texas	27.9%
480570005003	Block Group 3, Census Tract 5, Calhoun County, Texas	40.4%
480570005004	Block Group 4, Census Tract 5, Calhoun County, Texas	43.9%
480579900000	Block Group 0, Census Tract 9900, Calhoun County, Texas	0.0%
480717101001	Block Group 1, Census Tract 7101, Chambers County, Texas	41.1%
480717101002	Block Group 2, Census Tract 7101, Chambers County, Texas	19.7%
480717101003	Block Group 3, Census Tract 7101, Chambers County, Texas	26.4%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480717102001	Block Group 1, Census Tract 7102, Chambers County, Texas	12.5%
480717102002	Block Group 2, Census Tract 7102, Chambers County, Texas	27.1%
480717102003	Block Group 3, Census Tract 7102, Chambers County, Texas	18.5%
480717102004	Block Group 4, Census Tract 7102, Chambers County, Texas	37.3%
480717102005	Block Group 5, Census Tract 7102, Chambers County, Texas	13.8%
480717103001	Block Group 1, Census Tract 7103, Chambers County, Texas	28.1%
480717103002	Block Group 2, Census Tract 7103, Chambers County, Texas	41.1%
480717103003	Block Group 3, Census Tract 7103, Chambers County, Texas	65.1%
480717104011	Block Group 1, Census Tract 7104.01, Chambers County, Texas	28.2%
480717104012	Block Group 2, Census Tract 7104.01, Chambers County, Texas	34.1%
480717104013	Block Group 3, Census Tract 7104.01, Chambers County, Texas	36.2%
480717104014	Block Group 4, Census Tract 7104.01, Chambers County, Texas	37.7%
480717105001	Block Group 1, Census Tract 7105, Chambers County, Texas	48.2%
480717105002	Block Group 2, Census Tract 7105, Chambers County, Texas	56.9%
480717105003	Block Group 3, Census Tract 7105, Chambers County, Texas	34.2%
480717106001	Block Group 1, Census Tract 7106, Chambers County, Texas	0.0%
480719900000	Block Group 0, Census Tract 9900, Chambers County, Texas	0.0%
480897501001	Block Group 1, Census Tract 7501, Colorado County, Texas	88.6%
480897501002	Block Group 2, Census Tract 7501, Colorado County, Texas	35.9%
480897501003	Block Group 3, Census Tract 7501, Colorado County, Texas	24.0%
480897501004	Block Group 4, Census Tract 7501, Colorado County, Texas	41.3%
480897502001	Block Group 1, Census Tract 7502, Colorado County, Texas	42.0%
480897502002	Block Group 2, Census Tract 7502, Colorado County, Texas	50.8%
480897503001	Block Group 1, Census Tract 7503, Colorado County, Texas	32.5%
480897503002	Block Group 2, Census Tract 7503, Colorado County, Texas	37.0%
480897503003	Block Group 3, Census Tract 7503, Colorado County, Texas	44.5%
480897503004	Block Group 4, Census Tract 7503, Colorado County, Texas	41.6%
480897504001	Block Group 1, Census Tract 7504, Colorado County, Texas	29.0%
480897504002	Block Group 2, Census Tract 7504, Colorado County, Texas	22.2%
480897504003	Block Group 3, Census Tract 7504, Colorado County, Texas	26.4%
480897504004	Block Group 4, Census Tract 7504, Colorado County, Texas	30.8%
480897505001	Block Group 1, Census Tract 7505, Colorado County, Texas	42.7%
480897505002	Block Group 2, Census Tract 7505, Colorado County, Texas	29.1%
480897505003	Block Group 3, Census Tract 7505, Colorado County, Texas	51.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480897505004	Block Group 4, Census Tract 7505, Colorado County, Texas	55.9%
480913101001	Block Group 1, Census Tract 3101, Comal County, Texas	38.3%
480913101002	Block Group 2, Census Tract 3101, Comal County, Texas	43.9%
480913101003	Block Group 3, Census Tract 3101, Comal County, Texas	50.0%
480913101004	Block Group 4, Census Tract 3101, Comal County, Texas	52.3%
480913102001	Block Group 1, Census Tract 3102, Comal County, Texas	40.2%
480913102002	Block Group 2, Census Tract 3102, Comal County, Texas	22.9%
480913102003	Block Group 3, Census Tract 3102, Comal County, Texas	21.1%
480913103001	Block Group 1, Census Tract 3103, Comal County, Texas	8.8%
480913103002	Block Group 2, Census Tract 3103, Comal County, Texas	26.5%
480913103003	Block Group 3, Census Tract 3103, Comal County, Texas	45.1%
480913103004	Block Group 4, Census Tract 3103, Comal County, Texas	38.4%
480913104011	Block Group 1, Census Tract 3104.01, Comal County, Texas	50.9%
480913104012	Block Group 2, Census Tract 3104.01, Comal County, Texas	82.5%
480913104013	Block Group 3, Census Tract 3104.01, Comal County, Texas	62.5%
480913104014	Block Group 4, Census Tract 3104.01, Comal County, Texas	64.9%
480913104015	Block Group 5, Census Tract 3104.01, Comal County, Texas	54.2%
480913104016	Block Group 6, Census Tract 3104.01, Comal County, Texas	53.8%
480913104031	Block Group 1, Census Tract 3104.03, Comal County, Texas	11.9%
480913104032	Block Group 2, Census Tract 3104.03, Comal County, Texas	62.0%
480913104033	Block Group 3, Census Tract 3104.03, Comal County, Texas	39.9%
480913104041	Block Group 1, Census Tract 3104.04, Comal County, Texas	37.4%
480913104042	Block Group 2, Census Tract 3104.04, Comal County, Texas	33.3%
480913105011	Block Group 1, Census Tract 3105.01, Comal County, Texas	60.4%
480913105012	Block Group 2, Census Tract 3105.01, Comal County, Texas	49.1%
480913105021	Block Group 1, Census Tract 3105.02, Comal County, Texas	42.4%
480913105022	Block Group 2, Census Tract 3105.02, Comal County, Texas	41.7%
480913105031	Block Group 1, Census Tract 3105.03, Comal County, Texas	17.2%
480913105032	Block Group 2, Census Tract 3105.03, Comal County, Texas	19.4%
480913106031	Block Group 1, Census Tract 3106.03, Comal County, Texas	21.5%
480913106032	Block Group 2, Census Tract 3106.03, Comal County, Texas	12.4%
480913106041	Block Group 1, Census Tract 3106.04, Comal County, Texas	16.9%
480913106042	Block Group 2, Census Tract 3106.04, Comal County, Texas	31.4%
480913106051	Block Group 1, Census Tract 3106.05, Comal County, Texas	53.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
480913106052	Block Group 2, Census Tract 3106.05, Comal County, Texas	23.2%
480913106061	Block Group 1, Census Tract 3106.06, Comal County, Texas	19.1%
480913106062	Block Group 2, Census Tract 3106.06, Comal County, Texas	28.3%
480913106071	Block Group 1, Census Tract 3106.07, Comal County, Texas	18.9%
480913106072	Block Group 2, Census Tract 3106.07, Comal County, Texas	20.9%
480913106073	Block Group 3, Census Tract 3106.07, Comal County, Texas	33.1%
480913106081	Block Group 1, Census Tract 3106.08, Comal County, Texas	57.4%
480913106082	Block Group 2, Census Tract 3106.08, Comal County, Texas	56.6%
480913107011	Block Group 1, Census Tract 3107.01, Comal County, Texas	6.8%
480913107012	Block Group 2, Census Tract 3107.01, Comal County, Texas	12.5%
480913107013	Block Group 3, Census Tract 3107.01, Comal County, Texas	6.1%
480913107021	Block Group 1, Census Tract 3107.02, Comal County, Texas	13.6%
480913107022	Block Group 2, Census Tract 3107.02, Comal County, Texas	15.5%
480913107031	Block Group 1, Census Tract 3107.03, Comal County, Texas	23.1%
480913107032	Block Group 2, Census Tract 3107.03, Comal County, Texas	9.9%
480913107033	Block Group 3, Census Tract 3107.03, Comal County, Texas	23.1%
480913107041	Block Group 1, Census Tract 3107.04, Comal County, Texas	7.2%
480913107042	Block Group 2, Census Tract 3107.04, Comal County, Texas	31.0%
480913107043	Block Group 3, Census Tract 3107.04, Comal County, Texas	33.0%
480913107044	Block Group 4, Census Tract 3107.04, Comal County, Texas	31.7%
480913108011	Block Group 1, Census Tract 3108.01, Comal County, Texas	10.0%
480913108012	Block Group 2, Census Tract 3108.01, Comal County, Texas	4.0%
480913108013	Block Group 3, Census Tract 3108.01, Comal County, Texas	5.3%
480913108021	Block Group 1, Census Tract 3108.02, Comal County, Texas	14.6%
480913108022	Block Group 2, Census Tract 3108.02, Comal County, Texas	49.6%
480913109011	Block Group 1, Census Tract 3109.01, Comal County, Texas	9.9%
480913109012	Block Group 2, Census Tract 3109.01, Comal County, Texas	13.0%
480913109021	Block Group 1, Census Tract 3109.02, Comal County, Texas	27.9%
480913109022	Block Group 2, Census Tract 3109.02, Comal County, Texas	16.3%
480913109031	Block Group 1, Census Tract 3109.03, Comal County, Texas	11.8%
480913109032	Block Group 2, Census Tract 3109.03, Comal County, Texas	13.4%
481239701001	Block Group 1, Census Tract 9701, DeWitt County, Texas	43.5%
481239701002	Block Group 2, Census Tract 9701, DeWitt County, Texas	40.8%
481239701003	Block Group 3, Census Tract 9701, DeWitt County, Texas	56.5%



Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481239702001	Block Group 1, Census Tract 9702, DeWitt County, Texas	40.7%
481239702002	Block Group 2, Census Tract 9702, DeWitt County, Texas	47.4%
481239702003	Block Group 3, Census Tract 9702, DeWitt County, Texas	47.1%
481239702004	Block Group 4, Census Tract 9702, DeWitt County, Texas	70.5%
481239703001	Block Group 1, Census Tract 9703, DeWitt County, Texas	40.1%
481239703002	Block Group 2, Census Tract 9703, DeWitt County, Texas	31.4%
481239703003	Block Group 3, Census Tract 9703, DeWitt County, Texas	37.5%
481239703004	Block Group 4, Census Tract 9703, DeWitt County, Texas	18.1%
481239704001	Block Group 1, Census Tract 9704, DeWitt County, Texas	31.6%
481239704002	Block Group 2, Census Tract 9704, DeWitt County, Texas	28.3%
481239704003	Block Group 3, Census Tract 9704, DeWitt County, Texas	43.1%
481239705001	Block Group 1, Census Tract 9705, DeWitt County, Texas	21.0%
481239705002	Block Group 2, Census Tract 9705, DeWitt County, Texas	43.9%
481239705003	Block Group 3, Census Tract 9705, DeWitt County, Texas	35.8%
481499701001	Block Group 1, Census Tract 9701, Fayette County, Texas	23.4%
481499701002	Block Group 2, Census Tract 9701, Fayette County, Texas	35.2%
481499702001	Block Group 1, Census Tract 9702, Fayette County, Texas	30.7%
481499702002	Block Group 2, Census Tract 9702, Fayette County, Texas	11.3%
481499702003	Block Group 3, Census Tract 9702, Fayette County, Texas	25.2%
481499703001	Block Group 1, Census Tract 9703, Fayette County, Texas	46.4%
481499703002	Block Group 2, Census Tract 9703, Fayette County, Texas	49.3%
481499703003	Block Group 3, Census Tract 9703, Fayette County, Texas	46.0%
481499703004	Block Group 4, Census Tract 9703, Fayette County, Texas	62.0%
481499703005	Block Group 5, Census Tract 9703, Fayette County, Texas	55.0%
481499703006	Block Group 6, Census Tract 9703, Fayette County, Texas	72.5%
481499703007	Block Group 7, Census Tract 9703, Fayette County, Texas	31.3%
481499704001	Block Group 1, Census Tract 9704, Fayette County, Texas	16.5%
481499704002	Block Group 2, Census Tract 9704, Fayette County, Texas	18.7%
481499704003	Block Group 3, Census Tract 9704, Fayette County, Texas	38.7%
481499705001	Block Group 1, Census Tract 9705, Fayette County, Texas	17.4%
481499705002	Block Group 2, Census Tract 9705, Fayette County, Texas	10.8%
481499705003	Block Group 3, Census Tract 9705, Fayette County, Texas	56.6%
481499706001	Block Group 1, Census Tract 9706, Fayette County, Texas	47.4%
481499706002	Block Group 2, Census Tract 9706, Fayette County, Texas	35.9%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481499706003	Block Group 3, Census Tract 9706, Fayette County, Texas	60.1%
481499706004	Block Group 4, Census Tract 9706, Fayette County, Texas	83.9%
481499706005	Block Group 5, Census Tract 9706, Fayette County, Texas	54.2%
481499707001	Block Group 1, Census Tract 9707, Fayette County, Texas	32.2%
481499707002	Block Group 2, Census Tract 9707, Fayette County, Texas	34.4%
481576701011	Block Group 1, Census Tract 6701.01, Fort Bend County, Texas	48.6%
481576701012	Block Group 2, Census Tract 6701.01, Fort Bend County, Texas	73.5%
481576701013	Block Group 3, Census Tract 6701.01, Fort Bend County, Texas	68.1%
481576701014	Block Group 4, Census Tract 6701.01, Fort Bend County, Texas	33.5%
481576701021	Block Group 1, Census Tract 6701.02, Fort Bend County, Texas	73.1%
481576701022	Block Group 2, Census Tract 6701.02, Fort Bend County, Texas	19.3%
481576702001	Block Group 1, Census Tract 6702, Fort Bend County, Texas	29.6%
481576702002	Block Group 2, Census Tract 6702, Fort Bend County, Texas	54.7%
481576702003	Block Group 3, Census Tract 6702, Fort Bend County, Texas	72.1%
481576702004	Block Group 4, Census Tract 6702, Fort Bend County, Texas	42.9%
481576702005	Block Group 5, Census Tract 6702, Fort Bend County, Texas	38.2%
481576703001	Block Group 1, Census Tract 6703, Fort Bend County, Texas	51.1%
481576703002	Block Group 2, Census Tract 6703, Fort Bend County, Texas	36.2%
481576704001	Block Group 1, Census Tract 6704, Fort Bend County, Texas	50.2%
481576704002	Block Group 2, Census Tract 6704, Fort Bend County, Texas	36.1%
481576704003	Block Group 3, Census Tract 6704, Fort Bend County, Texas	42.5%
481576705001	Block Group 1, Census Tract 6705, Fort Bend County, Texas	26.9%
481576705002	Block Group 2, Census Tract 6705, Fort Bend County, Texas	48.9%
481576706011	Block Group 1, Census Tract 6706.01, Fort Bend County, Texas	19.9%
481576706012	Block Group 2, Census Tract 6706.01, Fort Bend County, Texas	31.2%
481576706013	Block Group 3, Census Tract 6706.01, Fort Bend County, Texas	41.3%
481576706014	Block Group 4, Census Tract 6706.01, Fort Bend County, Texas	12.8%
481576706021	Block Group 1, Census Tract 6706.02, Fort Bend County, Texas	44.1%
481576707001	Block Group 1, Census Tract 6707, Fort Bend County, Texas	37.6%
481576707002	Block Group 2, Census Tract 6707, Fort Bend County, Texas	37.3%
481576708001	Block Group 1, Census Tract 6708, Fort Bend County, Texas	19.4%
481576708002	Block Group 2, Census Tract 6708, Fort Bend County, Texas	67.4%
481576708003	Block Group 3, Census Tract 6708, Fort Bend County, Texas	31.4%
481576709011	Block Group 1, Census Tract 6709.01, Fort Bend County, Texas	2.7%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481576709012	Block Group 2, Census Tract 6709.01, Fort Bend County, Texas	19.8%
481576709013	Block Group 3, Census Tract 6709.01, Fort Bend County, Texas	14.9%
481576709021	Block Group 1, Census Tract 6709.02, Fort Bend County, Texas	22.9%
481576709022	Block Group 2, Census Tract 6709.02, Fort Bend County, Texas	29.3%
481576710011	Block Group 1, Census Tract 6710.01, Fort Bend County, Texas	23.6%
481576710012	Block Group 2, Census Tract 6710.01, Fort Bend County, Texas	29.3%
481576710013	Block Group 3, Census Tract 6710.01, Fort Bend County, Texas	16.3%
481576710014	Block Group 4, Census Tract 6710.01, Fort Bend County, Texas	12.1%
481576710021	Block Group 1, Census Tract 6710.02, Fort Bend County, Texas	16.2%
481576710022	Block Group 2, Census Tract 6710.02, Fort Bend County, Texas	3.5%
481576710023	Block Group 3, Census Tract 6710.02, Fort Bend County, Texas	30.6%
481576710024	Block Group 4, Census Tract 6710.02, Fort Bend County, Texas	25.3%
481576711001	Block Group 1, Census Tract 6711, Fort Bend County, Texas	54.8%
481576711002	Block Group 2, Census Tract 6711, Fort Bend County, Texas	57.1%
481576711003	Block Group 3, Census Tract 6711, Fort Bend County, Texas	72.9%
481576711004	Block Group 4, Census Tract 6711, Fort Bend County, Texas	26.3%
481576712001	Block Group 1, Census Tract 6712, Fort Bend County, Texas	37.4%
481576712002	Block Group 2, Census Tract 6712, Fort Bend County, Texas	52.5%
481576713001	Block Group 1, Census Tract 6713, Fort Bend County, Texas	66.2%
481576713002	Block Group 2, Census Tract 6713, Fort Bend County, Texas	42.5%
481576714001	Block Group 1, Census Tract 6714, Fort Bend County, Texas	41.8%
481576714002	Block Group 2, Census Tract 6714, Fort Bend County, Texas	35.7%
481576715011	Block Group 1, Census Tract 6715.01, Fort Bend County, Texas	24.0%
481576715012	Block Group 2, Census Tract 6715.01, Fort Bend County, Texas	8.7%
481576715013	Block Group 3, Census Tract 6715.01, Fort Bend County, Texas	6.0%
481576715014	Block Group 4, Census Tract 6715.01, Fort Bend County, Texas	11.3%
481576715021	Block Group 1, Census Tract 6715.02, Fort Bend County, Texas	39.4%
481576716011	Block Group 1, Census Tract 6716.01, Fort Bend County, Texas	37.4%
481576716012	Block Group 2, Census Tract 6716.01, Fort Bend County, Texas	35.9%
481576716013	Block Group 3, Census Tract 6716.01, Fort Bend County, Texas	1.9%
481576716014	Block Group 4, Census Tract 6716.01, Fort Bend County, Texas	17.3%
481576716021	Block Group 1, Census Tract 6716.02, Fort Bend County, Texas	17.2%
481576716022	Block Group 2, Census Tract 6716.02, Fort Bend County, Texas	7.7%
481576717001	Block Group 1, Census Tract 6717, Fort Bend County, Texas	19.9%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481576717002	Block Group 2, Census Tract 6717, Fort Bend County, Texas	10.0%
481576717003	Block Group 3, Census Tract 6717, Fort Bend County, Texas	16.2%
481576718001	Block Group 1, Census Tract 6718, Fort Bend County, Texas	33.4%
481576718002	Block Group 2, Census Tract 6718, Fort Bend County, Texas	18.1%
481576719001	Block Group 1, Census Tract 6719, Fort Bend County, Texas	12.4%
481576719002	Block Group 2, Census Tract 6719, Fort Bend County, Texas	17.8%
481576719003	Block Group 3, Census Tract 6719, Fort Bend County, Texas	32.9%
481576720011	Block Group 1, Census Tract 6720.01, Fort Bend County, Texas	30.9%
481576720012	Block Group 2, Census Tract 6720.01, Fort Bend County, Texas	15.9%
481576720013	Block Group 3, Census Tract 6720.01, Fort Bend County, Texas	67.3%
481576720014	Block Group 4, Census Tract 6720.01, Fort Bend County, Texas	42.3%
481576720021	Block Group 1, Census Tract 6720.02, Fort Bend County, Texas	37.8%
481576720022	Block Group 2, Census Tract 6720.02, Fort Bend County, Texas	45.6%
481576720023	Block Group 3, Census Tract 6720.02, Fort Bend County, Texas	20.3%
481576721001	Block Group 1, Census Tract 6721, Fort Bend County, Texas	3.6%
481576721002	Block Group 2, Census Tract 6721, Fort Bend County, Texas	24.8%
481576722001	Block Group 1, Census Tract 6722, Fort Bend County, Texas	4.5%
481576722002	Block Group 2, Census Tract 6722, Fort Bend County, Texas	37.2%
481576723011	Block Group 1, Census Tract 6723.01, Fort Bend County, Texas	31.2%
481576723021	Block Group 1, Census Tract 6723.02, Fort Bend County, Texas	20.9%
481576723022	Block Group 2, Census Tract 6723.02, Fort Bend County, Texas	25.4%
481576723023	Block Group 3, Census Tract 6723.02, Fort Bend County, Texas	12.1%
481576723024	Block Group 4, Census Tract 6723.02, Fort Bend County, Texas	21.9%
481576724001	Block Group 1, Census Tract 6724, Fort Bend County, Texas	32.0%
481576724002	Block Group 2, Census Tract 6724, Fort Bend County, Texas	49.8%
481576724003	Block Group 3, Census Tract 6724, Fort Bend County, Texas	50.3%
481576724004	Block Group 4, Census Tract 6724, Fort Bend County, Texas	22.3%
481576725001	Block Group 1, Census Tract 6725, Fort Bend County, Texas	62.3%
481576725002	Block Group 2, Census Tract 6725, Fort Bend County, Texas	25.7%
481576725003	Block Group 3, Census Tract 6725, Fort Bend County, Texas	18.5%
481576726011	Block Group 1, Census Tract 6726.01, Fort Bend County, Texas	49.3%
481576726012	Block Group 2, Census Tract 6726.01, Fort Bend County, Texas	40.9%
481576726013	Block Group 3, Census Tract 6726.01, Fort Bend County, Texas	34.8%
481576726014	Block Group 4, Census Tract 6726.01, Fort Bend County, Texas	28.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481576726015	Block Group 5, Census Tract 6726.01, Fort Bend County, Texas	55.2%
481576726021	Block Group 1, Census Tract 6726.02, Fort Bend County, Texas	21.0%
481576726022	Block Group 2, Census Tract 6726.02, Fort Bend County, Texas	20.3%
481576727011	Block Group 1, Census Tract 6727.01, Fort Bend County, Texas	34.7%
481576727012	Block Group 2, Census Tract 6727.01, Fort Bend County, Texas	32.5%
481576727013	Block Group 3, Census Tract 6727.01, Fort Bend County, Texas	33.2%
481576727021	Block Group 1, Census Tract 6727.02, Fort Bend County, Texas	10.5%
481576727022	Block Group 2, Census Tract 6727.02, Fort Bend County, Texas	20.3%
481576728001	Block Group 1, Census Tract 6728, Fort Bend County, Texas	34.3%
481576729001	Block Group 1, Census Tract 6729, Fort Bend County, Texas	27.3%
481576730011	Block Group 1, Census Tract 6730.01, Fort Bend County, Texas	7.4%
481576730012	Block Group 2, Census Tract 6730.01, Fort Bend County, Texas	7.8%
481576730013	Block Group 3, Census Tract 6730.01, Fort Bend County, Texas	5.7%
481576730021	Block Group 1, Census Tract 6730.02, Fort Bend County, Texas	10.4%
481576730022	Block Group 2, Census Tract 6730.02, Fort Bend County, Texas	4.6%
481576730031	Block Group 1, Census Tract 6730.03, Fort Bend County, Texas	3.9%
481576730032	Block Group 2, Census Tract 6730.03, Fort Bend County, Texas	9.7%
481576731011	Block Group 1, Census Tract 6731.01, Fort Bend County, Texas	9.3%
481576731012	Block Group 2, Census Tract 6731.01, Fort Bend County, Texas	13.2%
481576731013	Block Group 3, Census Tract 6731.01, Fort Bend County, Texas	14.5%
481576731021	Block Group 1, Census Tract 6731.02, Fort Bend County, Texas	6.3%
481576731022	Block Group 2, Census Tract 6731.02, Fort Bend County, Texas	6.4%
481576732001	Block Group 1, Census Tract 6732, Fort Bend County, Texas	26.0%
481576732002	Block Group 2, Census Tract 6732, Fort Bend County, Texas	24.6%
481576733001	Block Group 1, Census Tract 6733, Fort Bend County, Texas	9.6%
481576733002	Block Group 2, Census Tract 6733, Fort Bend County, Texas	9.5%
481576734001	Block Group 1, Census Tract 6734, Fort Bend County, Texas	13.7%
481576734002	Block Group 2, Census Tract 6734, Fort Bend County, Texas	21.5%
481576735001	Block Group 1, Census Tract 6735, Fort Bend County, Texas	9.5%
481576735002	Block Group 2, Census Tract 6735, Fort Bend County, Texas	32.4%
481576735003	Block Group 3, Census Tract 6735, Fort Bend County, Texas	6.0%
481576736001	Block Group 1, Census Tract 6736, Fort Bend County, Texas	22.7%
481576736002	Block Group 2, Census Tract 6736, Fort Bend County, Texas	7.3%
481576736003	Block Group 3, Census Tract 6736, Fort Bend County, Texas	31.0%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481576736004	Block Group 4, Census Tract 6736, Fort Bend County, Texas	4.6%
481576737001	Block Group 1, Census Tract 6737, Fort Bend County, Texas	0.0%
481576738001	Block Group 1, Census Tract 6738, Fort Bend County, Texas	29.2%
481576738002	Block Group 2, Census Tract 6738, Fort Bend County, Texas	22.9%
481576738003	Block Group 3, Census Tract 6738, Fort Bend County, Texas	26.5%
481576738004	Block Group 4, Census Tract 6738, Fort Bend County, Texas	40.5%
481576739011	Block Group 1, Census Tract 6739.01, Fort Bend County, Texas	0.5%
481576739012	Block Group 2, Census Tract 6739.01, Fort Bend County, Texas	3.2%
481576739013	Block Group 3, Census Tract 6739.01, Fort Bend County, Texas	2.5%
481576739014	Block Group 4, Census Tract 6739.01, Fort Bend County, Texas	5.8%
481576739021	Block Group 1, Census Tract 6739.02, Fort Bend County, Texas	6.8%
481576739022	Block Group 2, Census Tract 6739.02, Fort Bend County, Texas	27.0%
481576740001	Block Group 1, Census Tract 6740, Fort Bend County, Texas	17.7%
481576740002	Block Group 2, Census Tract 6740, Fort Bend County, Texas	38.8%
481576740003	Block Group 3, Census Tract 6740, Fort Bend County, Texas	13.6%
481576741001	Block Group 1, Census Tract 6741, Fort Bend County, Texas	17.9%
481576741002	Block Group 2, Census Tract 6741, Fort Bend County, Texas	12.1%
481576741003	Block Group 3, Census Tract 6741, Fort Bend County, Texas	14.3%
481576741004	Block Group 4, Census Tract 6741, Fort Bend County, Texas	13.9%
481576742001	Block Group 1, Census Tract 6742, Fort Bend County, Texas	0.7%
481576742002	Block Group 2, Census Tract 6742, Fort Bend County, Texas	19.6%
481576742003	Block Group 3, Census Tract 6742, Fort Bend County, Texas	4.1%
481576742004	Block Group 4, Census Tract 6742, Fort Bend County, Texas	9.1%
481576743001	Block Group 1, Census Tract 6743, Fort Bend County, Texas	33.2%
481576743002	Block Group 2, Census Tract 6743, Fort Bend County, Texas	6.3%
481576743003	Block Group 3, Census Tract 6743, Fort Bend County, Texas	7.0%
481576744001	Block Group 1, Census Tract 6744, Fort Bend County, Texas	7.1%
481576744002	Block Group 2, Census Tract 6744, Fort Bend County, Texas	5.2%
481576744003	Block Group 3, Census Tract 6744, Fort Bend County, Texas	3.6%
481576745011	Block Group 1, Census Tract 6745.01, Fort Bend County, Texas	7.0%
481576745021	Block Group 1, Census Tract 6745.02, Fort Bend County, Texas	20.0%
481576745022	Block Group 2, Census Tract 6745.02, Fort Bend County, Texas	4.5%
481576746011	Block Group 1, Census Tract 6746.01, Fort Bend County, Texas	7.8%
481576746012	Block Group 2, Census Tract 6746.01, Fort Bend County, Texas	24.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481576746021	Block Group 1, Census Tract 6746.02, Fort Bend County, Texas	14.8%
481576746022	Block Group 2, Census Tract 6746.02, Fort Bend County, Texas	2.8%
481576746031	Block Group 1, Census Tract 6746.03, Fort Bend County, Texas	5.7%
481576746032	Block Group 2, Census Tract 6746.03, Fort Bend County, Texas	18.2%
481576746033	Block Group 3, Census Tract 6746.03, Fort Bend County, Texas	30.1%
481576746041	Block Group 1, Census Tract 6746.04, Fort Bend County, Texas	15.4%
481576747001	Block Group 1, Census Tract 6747, Fort Bend County, Texas	11.8%
481576747002	Block Group 2, Census Tract 6747, Fort Bend County, Texas	79.6%
481576747003	Block Group 3, Census Tract 6747, Fort Bend County, Texas	31.2%
481576748001	Block Group 1, Census Tract 6748, Fort Bend County, Texas	79.6%
481576748002	Block Group 2, Census Tract 6748, Fort Bend County, Texas	65.6%
481576748003	Block Group 3, Census Tract 6748, Fort Bend County, Texas	14.1%
481576748004	Block Group 4, Census Tract 6748, Fort Bend County, Texas	77.3%
481576748005	Block Group 5, Census Tract 6748, Fort Bend County, Texas	50.2%
481576749001	Block Group 1, Census Tract 6749, Fort Bend County, Texas	66.0%
481576749002	Block Group 2, Census Tract 6749, Fort Bend County, Texas	70.7%
481576749003	Block Group 3, Census Tract 6749, Fort Bend County, Texas	50.8%
481576749004	Block Group 4, Census Tract 6749, Fort Bend County, Texas	64.2%
481576750001	Block Group 1, Census Tract 6750, Fort Bend County, Texas	67.4%
481576750002	Block Group 2, Census Tract 6750, Fort Bend County, Texas	72.4%
481576751001	Block Group 1, Census Tract 6751, Fort Bend County, Texas	25.7%
481576751002	Block Group 2, Census Tract 6751, Fort Bend County, Texas	50.6%
481576751003	Block Group 3, Census Tract 6751, Fort Bend County, Texas	29.4%
481576751004	Block Group 4, Census Tract 6751, Fort Bend County, Texas	29.8%
481576752001	Block Group 1, Census Tract 6752, Fort Bend County, Texas	77.7%
481576752002	Block Group 2, Census Tract 6752, Fort Bend County, Texas	49.5%
481576752003	Block Group 3, Census Tract 6752, Fort Bend County, Texas	51.3%
481576752004	Block Group 4, Census Tract 6752, Fort Bend County, Texas	27.1%
481576753001	Block Group 1, Census Tract 6753, Fort Bend County, Texas	45.6%
481576753002	Block Group 2, Census Tract 6753, Fort Bend County, Texas	32.5%
481576753003	Block Group 3, Census Tract 6753, Fort Bend County, Texas	91.3%
481576753004	Block Group 4, Census Tract 6753, Fort Bend County, Texas	73.0%
481576754001	Block Group 1, Census Tract 6754, Fort Bend County, Texas	62.5%
481576754002	Block Group 2, Census Tract 6754, Fort Bend County, Texas	48.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481576755001	Block Group 1, Census Tract 6755, Fort Bend County, Texas	18.1%
481576755002	Block Group 2, Census Tract 6755, Fort Bend County, Texas	58.9%
481576756001	Block Group 1, Census Tract 6756, Fort Bend County, Texas	35.9%
481576756002	Block Group 2, Census Tract 6756, Fort Bend County, Texas	41.0%
481576757001	Block Group 1, Census Tract 6757, Fort Bend County, Texas	32.9%
481576757002	Block Group 2, Census Tract 6757, Fort Bend County, Texas	43.0%
481576757003	Block Group 3, Census Tract 6757, Fort Bend County, Texas	32.2%
481576758001	Block Group 1, Census Tract 6758, Fort Bend County, Texas	24.4%
481576758002	Block Group 2, Census Tract 6758, Fort Bend County, Texas	39.8%
481576758003	Block Group 3, Census Tract 6758, Fort Bend County, Texas	60.2%
481677201001	Block Group 1, Census Tract 7201, Galveston County, Texas	4.0%
481677201002	Block Group 2, Census Tract 7201, Galveston County, Texas	46.6%
481677201003	Block Group 3, Census Tract 7201, Galveston County, Texas	27.8%
481677202001	Block Group 1, Census Tract 7202, Galveston County, Texas	2.2%
481677202002	Block Group 2, Census Tract 7202, Galveston County, Texas	14.7%
481677202003	Block Group 3, Census Tract 7202, Galveston County, Texas	42.6%
481677203011	Block Group 1, Census Tract 7203.01, Galveston County, Texas	35.9%
481677203012	Block Group 2, Census Tract 7203.01, Galveston County, Texas	31.8%
481677203021	Block Group 1, Census Tract 7203.02, Galveston County, Texas	3.0%
481677203022	Block Group 2, Census Tract 7203.02, Galveston County, Texas	12.9%
481677203023	Block Group 3, Census Tract 7203.02, Galveston County, Texas	2.4%
481677204001	Block Group 1, Census Tract 7204, Galveston County, Texas	1.6%
481677204002	Block Group 2, Census Tract 7204, Galveston County, Texas	3.3%
481677205011	Block Group 1, Census Tract 7205.01, Galveston County, Texas	3.2%
481677205012	Block Group 2, Census Tract 7205.01, Galveston County, Texas	6.6%
481677205021	Block Group 1, Census Tract 7205.02, Galveston County, Texas	45.6%
481677205022	Block Group 2, Census Tract 7205.02, Galveston County, Texas	15.4%
481677205023	Block Group 3, Census Tract 7205.02, Galveston County, Texas	52.2%
481677205031	Block Group 1, Census Tract 7205.03, Galveston County, Texas	4.9%
481677205032	Block Group 2, Census Tract 7205.03, Galveston County, Texas	18.1%
481677205033	Block Group 3, Census Tract 7205.03, Galveston County, Texas	14.4%
481677206001	Block Group 1, Census Tract 7206, Galveston County, Texas	16.4%
481677206002	Block Group 2, Census Tract 7206, Galveston County, Texas	17.2%
481677207001	Block Group 1, Census Tract 7207, Galveston County, Texas	15.7%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481677207002	Block Group 2, Census Tract 7207, Galveston County, Texas	18.3%
481677207003	Block Group 3, Census Tract 7207, Galveston County, Texas	29.0%
481677208001	Block Group 1, Census Tract 7208, Galveston County, Texas	77.7%
481677208002	Block Group 2, Census Tract 7208, Galveston County, Texas	22.8%
481677208003	Block Group 3, Census Tract 7208, Galveston County, Texas	40.3%
481677208004	Block Group 4, Census Tract 7208, Galveston County, Texas	25.0%
481677209001	Block Group 1, Census Tract 7209, Galveston County, Texas	100.0%
481677209002	Block Group 2, Census Tract 7209, Galveston County, Texas	14.8%
481677209003	Block Group 3, Census Tract 7209, Galveston County, Texas	60.5%
481677209004	Block Group 4, Census Tract 7209, Galveston County, Texas	64.5%
481677210001	Block Group 1, Census Tract 7210, Galveston County, Texas	40.9%
481677211001	Block Group 1, Census Tract 7211, Galveston County, Texas	56.3%
481677211002	Block Group 2, Census Tract 7211, Galveston County, Texas	57.8%
481677211003	Block Group 3, Census Tract 7211, Galveston County, Texas	36.2%
481677211004	Block Group 4, Census Tract 7211, Galveston County, Texas	56.6%
481677212011	Block Group 1, Census Tract 7212.01, Galveston County, Texas	17.6%
481677212012	Block Group 2, Census Tract 7212.01, Galveston County, Texas	30.6%
481677212013	Block Group 3, Census Tract 7212.01, Galveston County, Texas	15.9%
481677212014	Block Group 4, Census Tract 7212.01, Galveston County, Texas	15.4%
481677212015	Block Group 5, Census Tract 7212.01, Galveston County, Texas	4.8%
481677212021	Block Group 1, Census Tract 7212.02, Galveston County, Texas	24.8%
481677213001	Block Group 1, Census Tract 7213, Galveston County, Texas	15.3%
481677213002	Block Group 2, Census Tract 7213, Galveston County, Texas	58.9%
481677213003	Block Group 3, Census Tract 7213, Galveston County, Texas	35.0%
481677213004	Block Group 4, Census Tract 7213, Galveston County, Texas	10.1%
481677214001	Block Group 1, Census Tract 7214, Galveston County, Texas	5.6%
481677214002	Block Group 2, Census Tract 7214, Galveston County, Texas	10.8%
481677214003	Block Group 3, Census Tract 7214, Galveston County, Texas	7.1%
481677215001	Block Group 1, Census Tract 7215, Galveston County, Texas	19.6%
481677215002	Block Group 2, Census Tract 7215, Galveston County, Texas	30.1%
481677215003	Block Group 3, Census Tract 7215, Galveston County, Texas	26.3%
481677215004	Block Group 4, Census Tract 7215, Galveston County, Texas	34.9%
481677216001	Block Group 1, Census Tract 7216, Galveston County, Texas	64.5%
481677217001	Block Group 1, Census Tract 7217, Galveston County, Texas	62.4%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481677217002	Block Group 2, Census Tract 7217, Galveston County, Texas	56.0%
481677217003	Block Group 3, Census Tract 7217, Galveston County, Texas	64.6%
481677217004	Block Group 4, Census Tract 7217, Galveston County, Texas	93.7%
481677217005	Block Group 5, Census Tract 7217, Galveston County, Texas	68.2%
481677217006	Block Group 6, Census Tract 7217, Galveston County, Texas	23.9%
481677218001	Block Group 1, Census Tract 7218, Galveston County, Texas	51.9%
481677218002	Block Group 2, Census Tract 7218, Galveston County, Texas	49.8%
481677218003	Block Group 3, Census Tract 7218, Galveston County, Texas	45.6%
481677218004	Block Group 4, Census Tract 7218, Galveston County, Texas	55.1%
481677219001	Block Group 1, Census Tract 7219, Galveston County, Texas	28.4%
481677219002	Block Group 2, Census Tract 7219, Galveston County, Texas	45.6%
481677219003	Block Group 3, Census Tract 7219, Galveston County, Texas	66.1%
481677220011	Block Group 1, Census Tract 7220.01, Galveston County, Texas	15.5%
481677220012	Block Group 2, Census Tract 7220.01, Galveston County, Texas	12.5%
481677220013	Block Group 3, Census Tract 7220.01, Galveston County, Texas	57.9%
481677220021	Block Group 1, Census Tract 7220.02, Galveston County, Texas	28.8%
481677220022	Block Group 2, Census Tract 7220.02, Galveston County, Texas	34.0%
481677220023	Block Group 3, Census Tract 7220.02, Galveston County, Texas	39.2%
481677221001	Block Group 1, Census Tract 7221, Galveston County, Texas	40.9%
481677221002	Block Group 2, Census Tract 7221, Galveston County, Texas	34.9%
481677221003	Block Group 3, Census Tract 7221, Galveston County, Texas	32.7%
481677221004	Block Group 4, Census Tract 7221, Galveston County, Texas	31.8%
481677221005	Block Group 5, Census Tract 7221, Galveston County, Texas	35.1%
481677221006	Block Group 6, Census Tract 7221, Galveston County, Texas	32.2%
481677222001	Block Group 1, Census Tract 7222, Galveston County, Texas	46.8%
481677222002	Block Group 2, Census Tract 7222, Galveston County, Texas	75.8%
481677222003	Block Group 3, Census Tract 7222, Galveston County, Texas	79.2%
481677222004	Block Group 4, Census Tract 7222, Galveston County, Texas	90.6%
481677223001	Block Group 1, Census Tract 7223, Galveston County, Texas	82.6%
481677223002	Block Group 2, Census Tract 7223, Galveston County, Texas	79.2%
481677223003	Block Group 3, Census Tract 7223, Galveston County, Texas	88.2%
481677223004	Block Group 4, Census Tract 7223, Galveston County, Texas	57.7%
481677223005	Block Group 5, Census Tract 7223, Galveston County, Texas	62.4%
481677223006	Block Group 6, Census Tract 7223, Galveston County, Texas	23.4%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481677226001	Block Group 1, Census Tract 7226, Galveston County, Texas	47.8%
481677227001	Block Group 1, Census Tract 7227, Galveston County, Texas	61.7%
481677227002	Block Group 2, Census Tract 7227, Galveston County, Texas	45.9%
481677227003	Block Group 3, Census Tract 7227, Galveston County, Texas	45.4%
481677227004	Block Group 4, Census Tract 7227, Galveston County, Texas	33.1%
481677228001	Block Group 1, Census Tract 7228, Galveston County, Texas	41.5%
481677228002	Block Group 2, Census Tract 7228, Galveston County, Texas	57.2%
481677229001	Block Group 1, Census Tract 7229, Galveston County, Texas	44.7%
481677229002	Block Group 2, Census Tract 7229, Galveston County, Texas	33.5%
481677230001	Block Group 1, Census Tract 7230, Galveston County, Texas	59.9%
481677230002	Block Group 2, Census Tract 7230, Galveston County, Texas	47.8%
481677230003	Block Group 3, Census Tract 7230, Galveston County, Texas	22.9%
481677231001	Block Group 1, Census Tract 7231, Galveston County, Texas	35.9%
481677231002	Block Group 2, Census Tract 7231, Galveston County, Texas	34.8%
481677231003	Block Group 3, Census Tract 7231, Galveston County, Texas	52.5%
481677232001	Block Group 1, Census Tract 7232, Galveston County, Texas	47.5%
481677232002	Block Group 2, Census Tract 7232, Galveston County, Texas	47.0%
481677233001	Block Group 1, Census Tract 7233, Galveston County, Texas	35.8%
481677233002	Block Group 2, Census Tract 7233, Galveston County, Texas	8.8%
481677233003	Block Group 3, Census Tract 7233, Galveston County, Texas	14.5%
481677234001	Block Group 1, Census Tract 7234, Galveston County, Texas	34.4%
481677234002	Block Group 2, Census Tract 7234, Galveston County, Texas	21.2%
481677234003	Block Group 3, Census Tract 7234, Galveston County, Texas	4.1%
481677234004	Block Group 4, Census Tract 7234, Galveston County, Texas	25.6%
481677235011	Block Group 1, Census Tract 7235.01, Galveston County, Texas	57.1%
481677235012	Block Group 2, Census Tract 7235.01, Galveston County, Texas	60.7%
481677235021	Block Group 1, Census Tract 7235.02, Galveston County, Texas	33.6%
481677235022	Block Group 2, Census Tract 7235.02, Galveston County, Texas	29.5%
481677235023	Block Group 3, Census Tract 7235.02, Galveston County, Texas	34.8%
481677235024	Block Group 4, Census Tract 7235.02, Galveston County, Texas	29.6%
481677236001	Block Group 1, Census Tract 7236, Galveston County, Texas	50.3%
481677236002	Block Group 2, Census Tract 7236, Galveston County, Texas	36.6%
481677236003	Block Group 3, Census Tract 7236, Galveston County, Texas	31.4%
481677237001	Block Group 1, Census Tract 7237, Galveston County, Texas	70.1%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481677237002	Block Group 2, Census Tract 7237, Galveston County, Texas	86.6%
481677238001	Block Group 1, Census Tract 7238, Galveston County, Texas	37.7%
481677238002	Block Group 2, Census Tract 7238, Galveston County, Texas	7.6%
481677238003	Block Group 3, Census Tract 7238, Galveston County, Texas	27.0%
481677239001	Block Group 1, Census Tract 7239, Galveston County, Texas	43.5%
481677239002	Block Group 2, Census Tract 7239, Galveston County, Texas	41.5%
481677239003	Block Group 3, Census Tract 7239, Galveston County, Texas	65.1%
481677239004	Block Group 4, Census Tract 7239, Galveston County, Texas	72.6%
481677240001	Block Group 1, Census Tract 7240, Galveston County, Texas	93.5%
481677240002	Block Group 2, Census Tract 7240, Galveston County, Texas	57.3%
481677241011	Block Group 1, Census Tract 7241.01, Galveston County, Texas	67.1%
481677241012	Block Group 2, Census Tract 7241.01, Galveston County, Texas	63.8%
481677242001	Block Group 1, Census Tract 7242, Galveston County, Texas	43.3%
481677242002	Block Group 2, Census Tract 7242, Galveston County, Texas	54.6%
481677242003	Block Group 3, Census Tract 7242, Galveston County, Texas	47.1%
481677243001	Block Group 1, Census Tract 7243, Galveston County, Texas	59.3%
481677243002	Block Group 2, Census Tract 7243, Galveston County, Texas	69.6%
481677243003	Block Group 3, Census Tract 7243, Galveston County, Texas	46.6%
481677243004	Block Group 4, Census Tract 7243, Galveston County, Texas	53.2%
481677243005	Block Group 5, Census Tract 7243, Galveston County, Texas	64.0%
481677244001	Block Group 1, Census Tract 7244, Galveston County, Texas	57.6%
481677244002	Block Group 2, Census Tract 7244, Galveston County, Texas	68.9%
481677244003	Block Group 3, Census Tract 7244, Galveston County, Texas	85.1%
481677244004	Block Group 4, Census Tract 7244, Galveston County, Texas	68.2%
481677245001	Block Group 1, Census Tract 7245, Galveston County, Texas	39.3%
481677246001	Block Group 1, Census Tract 7246, Galveston County, Texas	100.0%
481677246002	Block Group 2, Census Tract 7246, Galveston County, Texas	74.6%
481677247001	Block Group 1, Census Tract 7247, Galveston County, Texas	59.8%
481677247002	Block Group 2, Census Tract 7247, Galveston County, Texas	66.2%
481677248001	Block Group 1, Census Tract 7248, Galveston County, Texas	51.4%
481677248002	Block Group 2, Census Tract 7248, Galveston County, Texas	50.4%
481677249001	Block Group 1, Census Tract 7249, Galveston County, Texas	59.4%
481677249002	Block Group 2, Census Tract 7249, Galveston County, Texas	64.2%
481677249003	Block Group 3, Census Tract 7249, Galveston County, Texas	62.2%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481677250001	Block Group 1, Census Tract 7250, Galveston County, Texas	37.8%
481677250002	Block Group 2, Census Tract 7250, Galveston County, Texas	71.3%
481677250003	Block Group 3, Census Tract 7250, Galveston County, Texas	56.2%
481677251001	Block Group 1, Census Tract 7251, Galveston County, Texas	67.4%
481677251002	Block Group 2, Census Tract 7251, Galveston County, Texas	77.8%
481677251003	Block Group 3, Census Tract 7251, Galveston County, Texas	65.0%
481677252001	Block Group 1, Census Tract 7252, Galveston County, Texas	69.9%
481677252002	Block Group 2, Census Tract 7252, Galveston County, Texas	93.8%
481677253001	Block Group 1, Census Tract 7253, Galveston County, Texas	55.1%
481677253002	Block Group 2, Census Tract 7253, Galveston County, Texas	33.3%
481677254001	Block Group 1, Census Tract 7254, Galveston County, Texas	43.2%
481677254002	Block Group 2, Census Tract 7254, Galveston County, Texas	63.5%
481677254003	Block Group 3, Census Tract 7254, Galveston County, Texas	59.7%
481677254004	Block Group 4, Census Tract 7254, Galveston County, Texas	52.8%
481677255001	Block Group 1, Census Tract 7255, Galveston County, Texas	17.3%
481677255002	Block Group 2, Census Tract 7255, Galveston County, Texas	25.0%
481677256001	Block Group 1, Census Tract 7256, Galveston County, Texas	61.1%
481677256002	Block Group 2, Census Tract 7256, Galveston County, Texas	69.1%
481677256003	Block Group 3, Census Tract 7256, Galveston County, Texas	66.5%
481677256004	Block Group 4, Census Tract 7256, Galveston County, Texas	80.8%
481677257001	Block Group 1, Census Tract 7257, Galveston County, Texas	33.2%
481677257002	Block Group 2, Census Tract 7257, Galveston County, Texas	22.0%
481677258001	Block Group 1, Census Tract 7258, Galveston County, Texas	45.2%
481677258002	Block Group 2, Census Tract 7258, Galveston County, Texas	59.0%
481677258003	Block Group 3, Census Tract 7258, Galveston County, Texas	58.3%
481677259001	Block Group 1, Census Tract 7259, Galveston County, Texas	18.8%
481677259002	Block Group 2, Census Tract 7259, Galveston County, Texas	66.4%
481677260001	Block Group 1, Census Tract 7260, Galveston County, Texas	30.4%
481677260002	Block Group 2, Census Tract 7260, Galveston County, Texas	23.8%
481677261001	Block Group 1, Census Tract 7261, Galveston County, Texas	40.4%
481677261002	Block Group 2, Census Tract 7261, Galveston County, Texas	25.3%
481677262001	Block Group 1, Census Tract 7262, Galveston County, Texas	78.5%
481677262002	Block Group 2, Census Tract 7262, Galveston County, Texas	63.2%
481679900000	Block Group 0, Census Tract 9900, Galveston County, Texas	0.0%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481759601001	Block Group 1, Census Tract 9601, Goliad County, Texas	17.6%
481759601002	Block Group 2, Census Tract 9601, Goliad County, Texas	32.3%
481759601003	Block Group 3, Census Tract 9601, Goliad County, Texas	65.6%
481759602001	Block Group 1, Census Tract 9602, Goliad County, Texas	26.9%
481759602002	Block Group 2, Census Tract 9602, Goliad County, Texas	24.6%
481759602003	Block Group 3, Census Tract 9602, Goliad County, Texas	31.7%
481770001001	Block Group 1, Census Tract 1, Gonzales County, Texas	41.3%
481770001002	Block Group 2, Census Tract 1, Gonzales County, Texas	49.7%
481770002001	Block Group 1, Census Tract 2, Gonzales County, Texas	18.8%
481770002002	Block Group 2, Census Tract 2, Gonzales County, Texas	23.0%
481770002003	Block Group 3, Census Tract 2, Gonzales County, Texas	34.0%
481770003001	Block Group 1, Census Tract 3, Gonzales County, Texas	71.9%
481770003002	Block Group 2, Census Tract 3, Gonzales County, Texas	43.1%
481770003003	Block Group 3, Census Tract 3, Gonzales County, Texas	58.1%
481770003004	Block Group 4, Census Tract 3, Gonzales County, Texas	68.5%
481770004001	Block Group 1, Census Tract 4, Gonzales County, Texas	42.6%
481770004002	Block Group 2, Census Tract 4, Gonzales County, Texas	23.4%
481770005001	Block Group 1, Census Tract 5, Gonzales County, Texas	46.1%
481770005002	Block Group 2, Census Tract 5, Gonzales County, Texas	47.6%
481770005003	Block Group 3, Census Tract 5, Gonzales County, Texas	71.7%
481770006001	Block Group 1, Census Tract 6, Gonzales County, Texas	42.3%
481770006002	Block Group 2, Census Tract 6, Gonzales County, Texas	35.3%
481851801011	Block Group 1, Census Tract 1801.01, Grimes County, Texas	61.9%
481851801012	Block Group 2, Census Tract 1801.01, Grimes County, Texas	57.4%
481851801013	Block Group 3, Census Tract 1801.01, Grimes County, Texas	60.9%
481851801021	Block Group 1, Census Tract 1801.02, Grimes County, Texas	40.1%
481851801022	Block Group 2, Census Tract 1801.02, Grimes County, Texas	50.2%
481851801023	Block Group 3, Census Tract 1801.02, Grimes County, Texas	40.1%
481851802001	Block Group 1, Census Tract 1802, Grimes County, Texas	35.3%
481851802002	Block Group 2, Census Tract 1802, Grimes County, Texas	31.9%
481851802003	Block Group 3, Census Tract 1802, Grimes County, Texas	36.7%
481851802004	Block Group 4, Census Tract 1802, Grimes County, Texas	40.4%
481851802005	Block Group 5, Census Tract 1802, Grimes County, Texas	22.9%
481851803011	Block Group 1, Census Tract 1803.01, Grimes County, Texas	38.6%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481851803012	Block Group 2, Census Tract 1803.01, Grimes County, Texas	31.1%
481851803013	Block Group 3, Census Tract 1803.01, Grimes County, Texas	23.7%
481851803014	Block Group 4, Census Tract 1803.01, Grimes County, Texas	13.0%
481851803021	Block Group 1, Census Tract 1803.02, Grimes County, Texas	62.9%
481851803022	Block Group 2, Census Tract 1803.02, Grimes County, Texas	28.5%
481851804001	Block Group 1, Census Tract 1804, Grimes County, Texas	17.4%
481872101001	Block Group 1, Census Tract 2101, Guadalupe County, Texas	31.6%
481872101002	Block Group 2, Census Tract 2101, Guadalupe County, Texas	65.1%
481872101003	Block Group 3, Census Tract 2101, Guadalupe County, Texas	57.0%
481872101004	Block Group 4, Census Tract 2101, Guadalupe County, Texas	36.0%
481872102001	Block Group 1, Census Tract 2102, Guadalupe County, Texas	93.4%
481872102002	Block Group 2, Census Tract 2102, Guadalupe County, Texas	86.0%
481872102003	Block Group 3, Census Tract 2102, Guadalupe County, Texas	83.7%
481872102004	Block Group 4, Census Tract 2102, Guadalupe County, Texas	70.9%
481872103001	Block Group 1, Census Tract 2103, Guadalupe County, Texas	78.8%
481872103002	Block Group 2, Census Tract 2103, Guadalupe County, Texas	77.9%
481872103003	Block Group 3, Census Tract 2103, Guadalupe County, Texas	61.5%
481872103004	Block Group 4, Census Tract 2103, Guadalupe County, Texas	63.9%
481872103005	Block Group 5, Census Tract 2103, Guadalupe County, Texas	43.6%
481872104001	Block Group 1, Census Tract 2104, Guadalupe County, Texas	30.1%
481872104002	Block Group 2, Census Tract 2104, Guadalupe County, Texas	65.4%
481872104003	Block Group 3, Census Tract 2104, Guadalupe County, Texas	29.6%
481872105041	Block Group 1, Census Tract 2105.04, Guadalupe County, Texas	29.0%
481872105042	Block Group 2, Census Tract 2105.04, Guadalupe County, Texas	33.8%
481872105051	Block Group 1, Census Tract 2105.05, Guadalupe County, Texas	49.0%
481872105052	Block Group 2, Census Tract 2105.05, Guadalupe County, Texas	51.6%
481872105061	Block Group 1, Census Tract 2105.06, Guadalupe County, Texas	44.8%
481872105062	Block Group 2, Census Tract 2105.06, Guadalupe County, Texas	37.8%
481872105071	Block Group 1, Census Tract 2105.07, Guadalupe County, Texas	28.3%
481872105072	Block Group 2, Census Tract 2105.07, Guadalupe County, Texas	27.5%
481872105081	Block Group 1, Census Tract 2105.08, Guadalupe County, Texas	41.8%
481872105082	Block Group 2, Census Tract 2105.08, Guadalupe County, Texas	19.8%
481872106031	Block Group 1, Census Tract 2106.03, Guadalupe County, Texas	31.7%
481872106032	Block Group 2, Census Tract 2106.03, Guadalupe County, Texas	61.4%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481872106041	Block Group 1, Census Tract 2106.04, Guadalupe County, Texas	23.9%
481872106042	Block Group 2, Census Tract 2106.04, Guadalupe County, Texas	16.7%
481872106043	Block Group 3, Census Tract 2106.04, Guadalupe County, Texas	27.6%
481872106061	Block Group 1, Census Tract 2106.06, Guadalupe County, Texas	39.6%
481872106062	Block Group 2, Census Tract 2106.06, Guadalupe County, Texas	48.6%
481872106071	Block Group 1, Census Tract 2106.07, Guadalupe County, Texas	21.3%
481872106072	Block Group 2, Census Tract 2106.07, Guadalupe County, Texas	9.7%
481872106073	Block Group 3, Census Tract 2106.07, Guadalupe County, Texas	15.3%
481872106081	Block Group 1, Census Tract 2106.08, Guadalupe County, Texas	25.7%
481872106082	Block Group 2, Census Tract 2106.08, Guadalupe County, Texas	65.7%
481872106083	Block Group 3, Census Tract 2106.08, Guadalupe County, Texas	48.1%
481872107051	Block Group 1, Census Tract 2107.05, Guadalupe County, Texas	31.8%
481872107052	Block Group 2, Census Tract 2107.05, Guadalupe County, Texas	41.8%
481872107061	Block Group 1, Census Tract 2107.06, Guadalupe County, Texas	51.8%
481872107062	Block Group 2, Census Tract 2107.06, Guadalupe County, Texas	47.5%
481872107063	Block Group 3, Census Tract 2107.06, Guadalupe County, Texas	46.7%
481872107071	Block Group 1, Census Tract 2107.07, Guadalupe County, Texas	18.8%
481872107072	Block Group 2, Census Tract 2107.07, Guadalupe County, Texas	5.5%
481872107081	Block Group 1, Census Tract 2107.08, Guadalupe County, Texas	6.8%
481872107082	Block Group 2, Census Tract 2107.08, Guadalupe County, Texas	3.0%
481872107091	Block Group 1, Census Tract 2107.09, Guadalupe County, Texas	2.8%
481872107092	Block Group 2, Census Tract 2107.09, Guadalupe County, Texas	6.4%
481872107093	Block Group 3, Census Tract 2107.09, Guadalupe County, Texas	11.2%
481872107101	Block Group 1, Census Tract 2107.10, Guadalupe County, Texas	0.0%
481872107102	Block Group 2, Census Tract 2107.10, Guadalupe County, Texas	0.0%
481872107111	Block Group 1, Census Tract 2107.11, Guadalupe County, Texas	7.0%
481872107112	Block Group 2, Census Tract 2107.11, Guadalupe County, Texas	6.3%
481872107121	Block Group 1, Census Tract 2107.12, Guadalupe County, Texas	6.2%
481872107122	Block Group 2, Census Tract 2107.12, Guadalupe County, Texas	13.3%
481872107123	Block Group 3, Census Tract 2107.12, Guadalupe County, Texas	1.1%
481872107131	Block Group 1, Census Tract 2107.13, Guadalupe County, Texas	11.3%
481872107132	Block Group 2, Census Tract 2107.13, Guadalupe County, Texas	8.8%
481872107141	Block Group 1, Census Tract 2107.14, Guadalupe County, Texas	16.9%
481872107142	Block Group 2, Census Tract 2107.14, Guadalupe County, Texas	36.6%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481872108011	Block Group 1, Census Tract 2108.01, Guadalupe County, Texas	29.0%
481872108012	Block Group 2, Census Tract 2108.01, Guadalupe County, Texas	75.3%
481872108013	Block Group 3, Census Tract 2108.01, Guadalupe County, Texas	39.6%
481872108031	Block Group 1, Census Tract 2108.03, Guadalupe County, Texas	19.7%
481872108032	Block Group 2, Census Tract 2108.03, Guadalupe County, Texas	31.4%
481872108041	Block Group 1, Census Tract 2108.04, Guadalupe County, Texas	31.8%
481872108042	Block Group 2, Census Tract 2108.04, Guadalupe County, Texas	37.0%
481872109011	Block Group 1, Census Tract 2109.01, Guadalupe County, Texas	31.1%
481872109012	Block Group 2, Census Tract 2109.01, Guadalupe County, Texas	38.5%
481872109013	Block Group 3, Census Tract 2109.01, Guadalupe County, Texas	44.1%
481872109021	Block Group 1, Census Tract 2109.02, Guadalupe County, Texas	27.6%
481872109022	Block Group 2, Census Tract 2109.02, Guadalupe County, Texas	45.2%
481990301001	Block Group 1, Census Tract 301, Hardin County, Texas	15.1%
481990301002	Block Group 2, Census Tract 301, Hardin County, Texas	52.4%
481990301003	Block Group 3, Census Tract 301, Hardin County, Texas	35.6%
481990302001	Block Group 1, Census Tract 302, Hardin County, Texas	10.0%
481990302002	Block Group 2, Census Tract 302, Hardin County, Texas	41.4%
481990302003	Block Group 3, Census Tract 302, Hardin County, Texas	31.9%
481990303001	Block Group 1, Census Tract 303, Hardin County, Texas	32.6%
481990303002	Block Group 2, Census Tract 303, Hardin County, Texas	29.2%
481990303003	Block Group 3, Census Tract 303, Hardin County, Texas	11.9%
481990303004	Block Group 4, Census Tract 303, Hardin County, Texas	12.3%
481990304001	Block Group 1, Census Tract 304, Hardin County, Texas	44.2%
481990304002	Block Group 2, Census Tract 304, Hardin County, Texas	71.0%
481990304003	Block Group 3, Census Tract 304, Hardin County, Texas	32.1%
481990305011	Block Group 1, Census Tract 305.01, Hardin County, Texas	11.1%
481990305012	Block Group 2, Census Tract 305.01, Hardin County, Texas	15.0%
481990305021	Block Group 1, Census Tract 305.02, Hardin County, Texas	26.3%
481990305022	Block Group 2, Census Tract 305.02, Hardin County, Texas	29.5%
481990305023	Block Group 3, Census Tract 305.02, Hardin County, Texas	24.8%
481990305024	Block Group 4, Census Tract 305.02, Hardin County, Texas	25.7%
481990305025	Block Group 5, Census Tract 305.02, Hardin County, Texas	31.4%
481990306001	Block Group 1, Census Tract 306, Hardin County, Texas	23.8%
481990306002	Block Group 2, Census Tract 306, Hardin County, Texas	23.2%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
481990307001	Block Group 1, Census Tract 307, Hardin County, Texas	35.8%
481990307002	Block Group 2, Census Tract 307, Hardin County, Texas	12.3%
481990307003	Block Group 3, Census Tract 307, Hardin County, Texas	34.4%
481990308001	Block Group 1, Census Tract 308, Hardin County, Texas	59.0%
481990308002	Block Group 2, Census Tract 308, Hardin County, Texas	23.0%
481990308003	Block Group 3, Census Tract 308, Hardin County, Texas	40.1%
481990308004	Block Group 4, Census Tract 308, Hardin County, Texas	57.5%
481990308005	Block Group 5, Census Tract 308, Hardin County, Texas	14.1%
481990308006	Block Group 6, Census Tract 308, Hardin County, Texas	28.2%
481990309001	Block Group 1, Census Tract 309, Hardin County, Texas	37.7%
481990309002	Block Group 2, Census Tract 309, Hardin County, Texas	35.2%
481990309003	Block Group 3, Census Tract 309, Hardin County, Texas	17.6%
481990310001	Block Group 1, Census Tract 310, Hardin County, Texas	60.8%
481990310002	Block Group 2, Census Tract 310, Hardin County, Texas	25.3%
481990310003	Block Group 3, Census Tract 310, Hardin County, Texas	36.2%
482011000001	Block Group 1, Census Tract 1000, Harris County, Texas	55.7%
482011000002	Block Group 2, Census Tract 1000, Harris County, Texas	51.5%
482011000003	Block Group 3, Census Tract 1000, Harris County, Texas	15.9%
482012101001	Block Group 1, Census Tract 2101, Harris County, Texas	0.0%
482012104001	Block Group 1, Census Tract 2104, Harris County, Texas	78.5%
482012104002	Block Group 2, Census Tract 2104, Harris County, Texas	64.1%
482012104003	Block Group 3, Census Tract 2104, Harris County, Texas	69.1%
482012104004	Block Group 4, Census Tract 2104, Harris County, Texas	71.7%
482012105001	Block Group 1, Census Tract 2105, Harris County, Texas	54.1%
482012105002	Block Group 2, Census Tract 2105, Harris County, Texas	65.1%
482012105003	Block Group 3, Census Tract 2105, Harris County, Texas	81.3%
482012106001	Block Group 1, Census Tract 2106, Harris County, Texas	64.9%
482012106002	Block Group 2, Census Tract 2106, Harris County, Texas	43.4%
482012106003	Block Group 3, Census Tract 2106, Harris County, Texas	44.5%
482012106004	Block Group 4, Census Tract 2106, Harris County, Texas	77.2%
482012107001	Block Group 1, Census Tract 2107, Harris County, Texas	65.9%
482012107002	Block Group 2, Census Tract 2107, Harris County, Texas	74.7%
482012107003	Block Group 3, Census Tract 2107, Harris County, Texas	47.6%
482012108001	Block Group 1, Census Tract 2108, Harris County, Texas	69.3%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012108002	Block Group 2, Census Tract 2108, Harris County, Texas	73.8%
482012109001	Block Group 1, Census Tract 2109, Harris County, Texas	77.8%
482012109002	Block Group 2, Census Tract 2109, Harris County, Texas	41.5%
482012110001	Block Group 1, Census Tract 2110, Harris County, Texas	73.3%
482012110002	Block Group 2, Census Tract 2110, Harris County, Texas	79.1%
482012111001	Block Group 1, Census Tract 2111, Harris County, Texas	97.7%
482012111002	Block Group 2, Census Tract 2111, Harris County, Texas	92.4%
482012111003	Block Group 3, Census Tract 2111, Harris County, Texas	93.8%
482012111004	Block Group 4, Census Tract 2111, Harris County, Texas	87.9%
482012111005	Block Group 5, Census Tract 2111, Harris County, Texas	85.9%
482012111006	Block Group 6, Census Tract 2111, Harris County, Texas	92.5%
482012112001	Block Group 1, Census Tract 2112, Harris County, Texas	88.0%
482012112002	Block Group 2, Census Tract 2112, Harris County, Texas	50.0%
482012112003	Block Group 3, Census Tract 2112, Harris County, Texas	78.5%
482012113001	Block Group 1, Census Tract 2113, Harris County, Texas	85.5%
482012113002	Block Group 2, Census Tract 2113, Harris County, Texas	94.8%
482012113003	Block Group 3, Census Tract 2113, Harris County, Texas	89.7%
482012113004	Block Group 4, Census Tract 2113, Harris County, Texas	65.2%
482012113005	Block Group 5, Census Tract 2113, Harris County, Texas	86.3%
482012114001	Block Group 1, Census Tract 2114, Harris County, Texas	58.6%
482012114002	Block Group 2, Census Tract 2114, Harris County, Texas	69.9%
482012114003	Block Group 3, Census Tract 2114, Harris County, Texas	38.3%
482012115001	Block Group 1, Census Tract 2115, Harris County, Texas	97.1%
482012115002	Block Group 2, Census Tract 2115, Harris County, Texas	69.7%
482012115003	Block Group 3, Census Tract 2115, Harris County, Texas	56.0%
482012115004	Block Group 4, Census Tract 2115, Harris County, Texas	80.0%
482012115005	Block Group 5, Census Tract 2115, Harris County, Texas	59.1%
482012116001	Block Group 1, Census Tract 2116, Harris County, Texas	69.6%
482012116002	Block Group 2, Census Tract 2116, Harris County, Texas	71.1%
482012117001	Block Group 1, Census Tract 2117, Harris County, Texas	75.5%
482012117002	Block Group 2, Census Tract 2117, Harris County, Texas	68.2%
482012117003	Block Group 3, Census Tract 2117, Harris County, Texas	66.7%
482012119001	Block Group 1, Census Tract 2119, Harris County, Texas	69.4%
482012119002	Block Group 2, Census Tract 2119, Harris County, Texas	86.0%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012119003	Block Group 3, Census Tract 2119, Harris County, Texas	79.0%
482012119004	Block Group 4, Census Tract 2119, Harris County, Texas	65.1%
482012123001	Block Group 1, Census Tract 2123, Harris County, Texas	83.3%
482012123002	Block Group 2, Census Tract 2123, Harris County, Texas	68.2%
482012123003	Block Group 3, Census Tract 2123, Harris County, Texas	87.7%
482012123004	Block Group 4, Census Tract 2123, Harris County, Texas	77.4%
482012123005	Block Group 5, Census Tract 2123, Harris County, Texas	61.2%
482012124001	Block Group 1, Census Tract 2124, Harris County, Texas	74.0%
482012124002	Block Group 2, Census Tract 2124, Harris County, Texas	78.1%
482012124003	Block Group 3, Census Tract 2124, Harris County, Texas	66.3%
482012125001	Block Group 1, Census Tract 2125, Harris County, Texas	65.1%
482012125002	Block Group 2, Census Tract 2125, Harris County, Texas	64.0%
482012125003	Block Group 3, Census Tract 2125, Harris County, Texas	61.2%
482012201001	Block Group 1, Census Tract 2201, Harris County, Texas	76.5%
482012201002	Block Group 2, Census Tract 2201, Harris County, Texas	70.2%
482012202001	Block Group 1, Census Tract 2202, Harris County, Texas	73.7%
482012202002	Block Group 2, Census Tract 2202, Harris County, Texas	60.2%
482012203001	Block Group 1, Census Tract 2203, Harris County, Texas	75.3%
482012203002	Block Group 2, Census Tract 2203, Harris County, Texas	63.9%
482012203003	Block Group 3, Census Tract 2203, Harris County, Texas	50.0%
482012204001	Block Group 1, Census Tract 2204, Harris County, Texas	77.8%
482012204002	Block Group 2, Census Tract 2204, Harris County, Texas	67.6%
482012204003	Block Group 3, Census Tract 2204, Harris County, Texas	71.4%
482012205001	Block Group 1, Census Tract 2205, Harris County, Texas	98.7%
482012205002	Block Group 2, Census Tract 2205, Harris County, Texas	67.2%
482012205003	Block Group 3, Census Tract 2205, Harris County, Texas	55.8%
482012206001	Block Group 1, Census Tract 2206, Harris County, Texas	51.2%
482012206002	Block Group 2, Census Tract 2206, Harris County, Texas	39.1%
482012207001	Block Group 1, Census Tract 2207, Harris County, Texas	74.5%
482012207002	Block Group 2, Census Tract 2207, Harris County, Texas	76.9%
482012207003	Block Group 3, Census Tract 2207, Harris County, Texas	55.4%
482012207004	Block Group 4, Census Tract 2207, Harris County, Texas	100.0%
482012207005	Block Group 5, Census Tract 2207, Harris County, Texas	76.9%
482012208001	Block Group 1, Census Tract 2208, Harris County, Texas	95.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012208002	Block Group 2, Census Tract 2208, Harris County, Texas	83.0%
482012209001	Block Group 1, Census Tract 2209, Harris County, Texas	72.6%
482012209002	Block Group 2, Census Tract 2209, Harris County, Texas	87.9%
482012210001	Block Group 1, Census Tract 2210, Harris County, Texas	80.5%
482012210002	Block Group 2, Census Tract 2210, Harris County, Texas	81.2%
482012211001	Block Group 1, Census Tract 2211, Harris County, Texas	60.8%
482012211002	Block Group 2, Census Tract 2211, Harris County, Texas	59.8%
482012211003	Block Group 3, Census Tract 2211, Harris County, Texas	76.9%
482012212001	Block Group 1, Census Tract 2212, Harris County, Texas	46.2%
482012212002	Block Group 2, Census Tract 2212, Harris County, Texas	83.1%
482012212003	Block Group 3, Census Tract 2212, Harris County, Texas	67.1%
482012213001	Block Group 1, Census Tract 2213, Harris County, Texas	77.1%
482012213002	Block Group 2, Census Tract 2213, Harris County, Texas	72.9%
482012213003	Block Group 3, Census Tract 2213, Harris County, Texas	77.7%
482012213004	Block Group 4, Census Tract 2213, Harris County, Texas	67.2%
482012213005	Block Group 5, Census Tract 2213, Harris County, Texas	57.8%
482012214001	Block Group 1, Census Tract 2214, Harris County, Texas	83.6%
482012214002	Block Group 2, Census Tract 2214, Harris County, Texas	54.5%
482012214003	Block Group 3, Census Tract 2214, Harris County, Texas	84.0%
482012215001	Block Group 1, Census Tract 2215, Harris County, Texas	69.9%
482012215002	Block Group 2, Census Tract 2215, Harris County, Texas	84.1%
482012215003	Block Group 3, Census Tract 2215, Harris County, Texas	76.2%
482012216001	Block Group 1, Census Tract 2216, Harris County, Texas	32.1%
482012216002	Block Group 2, Census Tract 2216, Harris County, Texas	41.6%
482012216003	Block Group 3, Census Tract 2216, Harris County, Texas	80.3%
482012216004	Block Group 4, Census Tract 2216, Harris County, Texas	61.0%
482012216005	Block Group 5, Census Tract 2216, Harris County, Texas	59.7%
482012217001	Block Group 1, Census Tract 2217, Harris County, Texas	87.2%
482012217002	Block Group 2, Census Tract 2217, Harris County, Texas	51.8%
482012217003	Block Group 3, Census Tract 2217, Harris County, Texas	39.5%
482012217004	Block Group 4, Census Tract 2217, Harris County, Texas	72.4%
482012218001	Block Group 1, Census Tract 2218, Harris County, Texas	75.1%
482012218002	Block Group 2, Census Tract 2218, Harris County, Texas	66.5%
482012219001	Block Group 1, Census Tract 2219, Harris County, Texas	84.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012219002	Block Group 2, Census Tract 2219, Harris County, Texas	61.2%
482012219003	Block Group 3, Census Tract 2219, Harris County, Texas	96.0%
482012220001	Block Group 1, Census Tract 2220, Harris County, Texas	63.5%
482012221001	Block Group 1, Census Tract 2221, Harris County, Texas	52.6%
482012221002	Block Group 2, Census Tract 2221, Harris County, Texas	70.4%
482012222001	Block Group 1, Census Tract 2222, Harris County, Texas	79.7%
482012222002	Block Group 2, Census Tract 2222, Harris County, Texas	81.9%
482012223001	Block Group 1, Census Tract 2223, Harris County, Texas	56.8%
482012223002	Block Group 2, Census Tract 2223, Harris County, Texas	58.6%
482012223003	Block Group 3, Census Tract 2223, Harris County, Texas	57.7%
482012224011	Block Group 1, Census Tract 2224.01, Harris County, Texas	77.8%
482012224012	Block Group 2, Census Tract 2224.01, Harris County, Texas	61.5%
482012224021	Block Group 1, Census Tract 2224.02, Harris County, Texas	54.8%
482012224022	Block Group 2, Census Tract 2224.02, Harris County, Texas	89.6%
482012224023	Block Group 3, Census Tract 2224.02, Harris County, Texas	53.4%
482012225011	Block Group 1, Census Tract 2225.01, Harris County, Texas	93.8%
482012225012	Block Group 2, Census Tract 2225.01, Harris County, Texas	67.5%
482012225021	Block Group 1, Census Tract 2225.02, Harris County, Texas	57.8%
482012225022	Block Group 2, Census Tract 2225.02, Harris County, Texas	36.8%
482012225031	Block Group 1, Census Tract 2225.03, Harris County, Texas	51.9%
482012225032	Block Group 2, Census Tract 2225.03, Harris County, Texas	81.3%
482012225033	Block Group 3, Census Tract 2225.03, Harris County, Texas	81.6%
482012226001	Block Group 1, Census Tract 2226, Harris County, Texas	82.4%
482012226002	Block Group 2, Census Tract 2226, Harris County, Texas	91.1%
482012227001	Block Group 1, Census Tract 2227, Harris County, Texas	81.9%
482012227002	Block Group 2, Census Tract 2227, Harris County, Texas	97.1%
482012228001	Block Group 1, Census Tract 2228, Harris County, Texas	58.2%
482012228002	Block Group 2, Census Tract 2228, Harris County, Texas	59.0%
482012229001	Block Group 1, Census Tract 2229, Harris County, Texas	62.4%
482012229002	Block Group 2, Census Tract 2229, Harris County, Texas	44.6%
482012229003	Block Group 3, Census Tract 2229, Harris County, Texas	51.2%
482012229004	Block Group 4, Census Tract 2229, Harris County, Texas	58.2%
482012230011	Block Group 1, Census Tract 2230.01, Harris County, Texas	71.2%
482012230012	Block Group 2, Census Tract 2230.01, Harris County, Texas	34.4%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012230021	Block Group 1, Census Tract 2230.02, Harris County, Texas	53.7%
482012230022	Block Group 2, Census Tract 2230.02, Harris County, Texas	85.9%
482012231001	Block Group 1, Census Tract 2231, Harris County, Texas	70.2%
482012301001	Block Group 1, Census Tract 2301, Harris County, Texas	91.6%
482012302001	Block Group 1, Census Tract 2302, Harris County, Texas	90.4%
482012302002	Block Group 2, Census Tract 2302, Harris County, Texas	63.7%
482012302003	Block Group 3, Census Tract 2302, Harris County, Texas	73.5%
482012302004	Block Group 4, Census Tract 2302, Harris County, Texas	50.8%
482012302005	Block Group 5, Census Tract 2302, Harris County, Texas	47.3%
482012303001	Block Group 1, Census Tract 2303, Harris County, Texas	92.0%
482012303002	Block Group 2, Census Tract 2303, Harris County, Texas	73.8%
482012304001	Block Group 1, Census Tract 2304, Harris County, Texas	56.9%
482012304002	Block Group 2, Census Tract 2304, Harris County, Texas	75.8%
482012304003	Block Group 3, Census Tract 2304, Harris County, Texas	75.2%
482012305001	Block Group 1, Census Tract 2305, Harris County, Texas	65.9%
482012305002	Block Group 2, Census Tract 2305, Harris County, Texas	59.4%
482012305003	Block Group 3, Census Tract 2305, Harris County, Texas	64.7%
482012306001	Block Group 1, Census Tract 2306, Harris County, Texas	93.1%
482012306002	Block Group 2, Census Tract 2306, Harris County, Texas	73.8%
482012307001	Block Group 1, Census Tract 2307, Harris County, Texas	74.7%
482012307002	Block Group 2, Census Tract 2307, Harris County, Texas	66.7%
482012307003	Block Group 3, Census Tract 2307, Harris County, Texas	74.2%
482012308001	Block Group 1, Census Tract 2308, Harris County, Texas	57.2%
482012308002	Block Group 2, Census Tract 2308, Harris County, Texas	66.7%
482012309001	Block Group 1, Census Tract 2309, Harris County, Texas	68.8%
482012309002	Block Group 2, Census Tract 2309, Harris County, Texas	61.6%
482012309003	Block Group 3, Census Tract 2309, Harris County, Texas	70.2%
482012309004	Block Group 4, Census Tract 2309, Harris County, Texas	83.2%
482012310001	Block Group 1, Census Tract 2310, Harris County, Texas	69.8%
482012310002	Block Group 2, Census Tract 2310, Harris County, Texas	79.9%
482012311001	Block Group 1, Census Tract 2311, Harris County, Texas	55.5%
482012311002	Block Group 2, Census Tract 2311, Harris County, Texas	59.7%
482012311003	Block Group 3, Census Tract 2311, Harris County, Texas	60.6%
482012312001	Block Group 1, Census Tract 2312, Harris County, Texas	77.1%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012312002	Block Group 2, Census Tract 2312, Harris County, Texas	41.9%
482012312003	Block Group 3, Census Tract 2312, Harris County, Texas	65.7%
482012313001	Block Group 1, Census Tract 2313, Harris County, Texas	62.9%
482012313002	Block Group 2, Census Tract 2313, Harris County, Texas	59.5%
482012314001	Block Group 1, Census Tract 2314, Harris County, Texas	60.4%
482012315001	Block Group 1, Census Tract 2315, Harris County, Texas	70.0%
482012315002	Block Group 2, Census Tract 2315, Harris County, Texas	69.9%
482012316001	Block Group 1, Census Tract 2316, Harris County, Texas	55.9%
482012316002	Block Group 2, Census Tract 2316, Harris County, Texas	55.5%
482012317001	Block Group 1, Census Tract 2317, Harris County, Texas	64.5%
482012317002	Block Group 2, Census Tract 2317, Harris County, Texas	64.6%
482012318001	Block Group 1, Census Tract 2318, Harris County, Texas	68.1%
482012318002	Block Group 2, Census Tract 2318, Harris County, Texas	72.1%
482012319001	Block Group 1, Census Tract 2319, Harris County, Texas	53.5%
482012319002	Block Group 2, Census Tract 2319, Harris County, Texas	63.9%
482012319003	Block Group 3, Census Tract 2319, Harris County, Texas	38.5%
482012319004	Block Group 4, Census Tract 2319, Harris County, Texas	58.9%
482012320001	Block Group 1, Census Tract 2320, Harris County, Texas	32.7%
482012320002	Block Group 2, Census Tract 2320, Harris County, Texas	64.1%
482012321001	Block Group 1, Census Tract 2321, Harris County, Texas	73.6%
482012321002	Block Group 2, Census Tract 2321, Harris County, Texas	71.3%
482012322001	Block Group 1, Census Tract 2322, Harris County, Texas	27.5%
482012322002	Block Group 2, Census Tract 2322, Harris County, Texas	76.0%
482012322003	Block Group 3, Census Tract 2322, Harris County, Texas	22.9%
482012322004	Block Group 4, Census Tract 2322, Harris County, Texas	72.1%
482012323011	Block Group 1, Census Tract 2323.01, Harris County, Texas	55.5%
482012323012	Block Group 2, Census Tract 2323.01, Harris County, Texas	65.8%
482012323013	Block Group 3, Census Tract 2323.01, Harris County, Texas	50.2%
482012323021	Block Group 1, Census Tract 2323.02, Harris County, Texas	54.1%
482012323022	Block Group 2, Census Tract 2323.02, Harris County, Texas	47.4%
482012323023	Block Group 3, Census Tract 2323.02, Harris County, Texas	37.9%
482012324011	Block Group 1, Census Tract 2324.01, Harris County, Texas	25.7%
482012324012	Block Group 2, Census Tract 2324.01, Harris County, Texas	40.2%
482012324013	Block Group 3, Census Tract 2324.01, Harris County, Texas	46.0%



Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012324014	Block Group 4, Census Tract 2324.01, Harris County, Texas	72.2%
482012324021	Block Group 1, Census Tract 2324.02, Harris County, Texas	46.4%
482012324022	Block Group 2, Census Tract 2324.02, Harris County, Texas	52.8%
482012324031	Block Group 1, Census Tract 2324.03, Harris County, Texas	66.2%
482012324032	Block Group 2, Census Tract 2324.03, Harris County, Texas	58.3%
482012325001	Block Group 1, Census Tract 2325, Harris County, Texas	50.3%
482012326001	Block Group 1, Census Tract 2326, Harris County, Texas	20.2%
482012326002	Block Group 2, Census Tract 2326, Harris County, Texas	23.9%
482012327011	Block Group 1, Census Tract 2327.01, Harris County, Texas	59.3%
482012327012	Block Group 2, Census Tract 2327.01, Harris County, Texas	50.6%
482012327013	Block Group 3, Census Tract 2327.01, Harris County, Texas	64.9%
482012327021	Block Group 1, Census Tract 2327.02, Harris County, Texas	86.3%
482012327022	Block Group 2, Census Tract 2327.02, Harris County, Texas	52.2%
482012327023	Block Group 3, Census Tract 2327.02, Harris County, Texas	59.5%
482012328001	Block Group 1, Census Tract 2328, Harris County, Texas	69.6%
482012328002	Block Group 2, Census Tract 2328, Harris County, Texas	40.8%
482012329001	Block Group 1, Census Tract 2329, Harris County, Texas	15.3%
482012329002	Block Group 2, Census Tract 2329, Harris County, Texas	47.8%
482012329003	Block Group 3, Census Tract 2329, Harris County, Texas	39.0%
482012330011	Block Group 1, Census Tract 2330.01, Harris County, Texas	63.2%
482012330012	Block Group 2, Census Tract 2330.01, Harris County, Texas	69.2%
482012330021	Block Group 1, Census Tract 2330.02, Harris County, Texas	15.8%
482012330022	Block Group 2, Census Tract 2330.02, Harris County, Texas	30.5%
482012330031	Block Group 1, Census Tract 2330.03, Harris County, Texas	54.0%
482012330032	Block Group 2, Census Tract 2330.03, Harris County, Texas	30.3%
482012331011	Block Group 1, Census Tract 2331.01, Harris County, Texas	83.4%
482012331012	Block Group 2, Census Tract 2331.01, Harris County, Texas	31.9%
482012331013	Block Group 3, Census Tract 2331.01, Harris County, Texas	52.8%
482012331021	Block Group 1, Census Tract 2331.02, Harris County, Texas	65.0%
482012331022	Block Group 2, Census Tract 2331.02, Harris County, Texas	77.8%
482012331023	Block Group 3, Census Tract 2331.02, Harris County, Texas	70.9%
482012331031	Block Group 1, Census Tract 2331.03, Harris County, Texas	72.1%
482012331032	Block Group 2, Census Tract 2331.03, Harris County, Texas	64.8%
482012332001	Block Group 1, Census Tract 2332, Harris County, Texas	43.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012332002	Block Group 2, Census Tract 2332, Harris County, Texas	67.6%
482012332003	Block Group 3, Census Tract 2332, Harris County, Texas	44.3%
482012332004	Block Group 4, Census Tract 2332, Harris County, Texas	56.3%
482012333001	Block Group 1, Census Tract 2333, Harris County, Texas	90.6%
482012333002	Block Group 2, Census Tract 2333, Harris County, Texas	74.1%
482012333003	Block Group 3, Census Tract 2333, Harris County, Texas	70.5%
482012334001	Block Group 1, Census Tract 2334, Harris County, Texas	47.8%
482012334002	Block Group 2, Census Tract 2334, Harris County, Texas	56.2%
482012335001	Block Group 1, Census Tract 2335, Harris County, Texas	40.8%
482012335002	Block Group 2, Census Tract 2335, Harris County, Texas	66.5%
482012335003	Block Group 3, Census Tract 2335, Harris County, Texas	46.5%
482012335004	Block Group 4, Census Tract 2335, Harris County, Texas	86.6%
482012336001	Block Group 1, Census Tract 2336, Harris County, Texas	71.9%
482012336002	Block Group 2, Census Tract 2336, Harris County, Texas	64.2%
482012337011	Block Group 1, Census Tract 2337.01, Harris County, Texas	55.7%
482012337012	Block Group 2, Census Tract 2337.01, Harris County, Texas	77.8%
482012337021	Block Group 1, Census Tract 2337.02, Harris County, Texas	91.1%
482012337022	Block Group 2, Census Tract 2337.02, Harris County, Texas	73.5%
482012337023	Block Group 3, Census Tract 2337.02, Harris County, Texas	57.4%
482012337031	Block Group 1, Census Tract 2337.03, Harris County, Texas	69.3%
482012337032	Block Group 2, Census Tract 2337.03, Harris County, Texas	65.9%
482012401001	Block Group 1, Census Tract 2401, Harris County, Texas	71.1%
482012401002	Block Group 2, Census Tract 2401, Harris County, Texas	86.4%
482012404001	Block Group 1, Census Tract 2404, Harris County, Texas	33.8%
482012404002	Block Group 2, Census Tract 2404, Harris County, Texas	74.2%
482012405011	Block Group 1, Census Tract 2405.01, Harris County, Texas	72.4%
482012405012	Block Group 2, Census Tract 2405.01, Harris County, Texas	81.1%
482012405021	Block Group 1, Census Tract 2405.02, Harris County, Texas	89.8%
482012405022	Block Group 2, Census Tract 2405.02, Harris County, Texas	82.5%
482012405023	Block Group 3, Census Tract 2405.02, Harris County, Texas	95.5%
482012406001	Block Group 1, Census Tract 2406, Harris County, Texas	75.9%
482012407011	Block Group 1, Census Tract 2407.01, Harris County, Texas	35.6%
482012407012	Block Group 2, Census Tract 2407.01, Harris County, Texas	43.4%
482012407021	Block Group 1, Census Tract 2407.02, Harris County, Texas	62.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012407022	Block Group 2, Census Tract 2407.02, Harris County, Texas	52.0%
482012408011	Block Group 1, Census Tract 2408.01, Harris County, Texas	72.0%
482012408012	Block Group 2, Census Tract 2408.01, Harris County, Texas	92.9%
482012408013	Block Group 3, Census Tract 2408.01, Harris County, Texas	47.5%
482012408014	Block Group 4, Census Tract 2408.01, Harris County, Texas	80.7%
482012408021	Block Group 1, Census Tract 2408.02, Harris County, Texas	45.4%
482012408022	Block Group 2, Census Tract 2408.02, Harris County, Texas	62.0%
482012409011	Block Group 1, Census Tract 2409.01, Harris County, Texas	36.3%
482012409012	Block Group 2, Census Tract 2409.01, Harris County, Texas	43.0%
482012409021	Block Group 1, Census Tract 2409.02, Harris County, Texas	25.7%
482012409022	Block Group 2, Census Tract 2409.02, Harris County, Texas	34.2%
482012409023	Block Group 3, Census Tract 2409.02, Harris County, Texas	55.9%
482012409024	Block Group 4, Census Tract 2409.02, Harris County, Texas	21.9%
482012410001	Block Group 1, Census Tract 2410, Harris County, Texas	39.0%
482012410002	Block Group 2, Census Tract 2410, Harris County, Texas	30.7%
482012410003	Block Group 3, Census Tract 2410, Harris County, Texas	30.5%
482012410004	Block Group 4, Census Tract 2410, Harris County, Texas	29.6%
482012411011	Block Group 1, Census Tract 2411.01, Harris County, Texas	46.7%
482012411012	Block Group 2, Census Tract 2411.01, Harris County, Texas	24.0%
482012411021	Block Group 1, Census Tract 2411.02, Harris County, Texas	30.6%
482012411022	Block Group 2, Census Tract 2411.02, Harris County, Texas	27.5%
482012411023	Block Group 3, Census Tract 2411.02, Harris County, Texas	33.8%
482012411024	Block Group 4, Census Tract 2411.02, Harris County, Texas	22.8%
482012411025	Block Group 5, Census Tract 2411.02, Harris County, Texas	33.8%
482012411031	Block Group 1, Census Tract 2411.03, Harris County, Texas	67.8%
482012411032	Block Group 2, Census Tract 2411.03, Harris County, Texas	23.3%
482012412001	Block Group 1, Census Tract 2412, Harris County, Texas	47.9%
482012412002	Block Group 2, Census Tract 2412, Harris County, Texas	10.6%
482012412003	Block Group 3, Census Tract 2412, Harris County, Texas	40.4%
482012413001	Block Group 1, Census Tract 2413, Harris County, Texas	10.1%
482012413002	Block Group 2, Census Tract 2413, Harris County, Texas	15.5%
482012413003	Block Group 3, Census Tract 2413, Harris County, Texas	29.7%
482012414001	Block Group 1, Census Tract 2414, Harris County, Texas	15.2%
482012414002	Block Group 2, Census Tract 2414, Harris County, Texas	14.3%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012414003	Block Group 3, Census Tract 2414, Harris County, Texas	23.2%
482012415001	Block Group 1, Census Tract 2415, Harris County, Texas	70.6%
482012415002	Block Group 2, Census Tract 2415, Harris County, Texas	51.7%
482012415003	Block Group 3, Census Tract 2415, Harris County, Texas	72.3%
482012415004	Block Group 4, Census Tract 2415, Harris County, Texas	58.1%
482012501001	Block Group 1, Census Tract 2501, Harris County, Texas	15.1%
482012501002	Block Group 2, Census Tract 2501, Harris County, Texas	52.0%
482012501003	Block Group 3, Census Tract 2501, Harris County, Texas	29.8%
482012502001	Block Group 1, Census Tract 2502, Harris County, Texas	45.6%
482012502002	Block Group 2, Census Tract 2502, Harris County, Texas	51.0%
482012503011	Block Group 1, Census Tract 2503.01, Harris County, Texas	12.2%
482012503012	Block Group 2, Census Tract 2503.01, Harris County, Texas	48.0%
482012503021	Block Group 1, Census Tract 2503.02, Harris County, Texas	13.2%
482012503022	Block Group 2, Census Tract 2503.02, Harris County, Texas	35.6%
482012503023	Block Group 3, Census Tract 2503.02, Harris County, Texas	21.2%
482012504011	Block Group 1, Census Tract 2504.01, Harris County, Texas	13.9%
482012504012	Block Group 2, Census Tract 2504.01, Harris County, Texas	13.4%
482012504021	Block Group 1, Census Tract 2504.02, Harris County, Texas	8.2%
482012504022	Block Group 2, Census Tract 2504.02, Harris County, Texas	37.2%
482012504023	Block Group 3, Census Tract 2504.02, Harris County, Texas	17.2%
482012505001	Block Group 1, Census Tract 2505, Harris County, Texas	30.2%
482012505002	Block Group 2, Census Tract 2505, Harris County, Texas	31.7%
482012506001	Block Group 1, Census Tract 2506, Harris County, Texas	68.5%
482012506002	Block Group 2, Census Tract 2506, Harris County, Texas	78.6%
482012506003	Block Group 3, Census Tract 2506, Harris County, Texas	73.8%
482012506004	Block Group 4, Census Tract 2506, Harris County, Texas	77.9%
482012506005	Block Group 5, Census Tract 2506, Harris County, Texas	52.5%
482012507011	Block Group 1, Census Tract 2507.01, Harris County, Texas	21.0%
482012507012	Block Group 2, Census Tract 2507.01, Harris County, Texas	10.3%
482012507013	Block Group 3, Census Tract 2507.01, Harris County, Texas	33.2%
482012507021	Block Group 1, Census Tract 2507.02, Harris County, Texas	13.6%
482012507022	Block Group 2, Census Tract 2507.02, Harris County, Texas	8.7%
482012508001	Block Group 1, Census Tract 2508, Harris County, Texas	4.6%
482012508002	Block Group 2, Census Tract 2508, Harris County, Texas	32.2%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012508003	Block Group 3, Census Tract 2508, Harris County, Texas	5.7%
482012509001	Block Group 1, Census Tract 2509, Harris County, Texas	1.6%
482012509002	Block Group 2, Census Tract 2509, Harris County, Texas	13.6%
482012509003	Block Group 3, Census Tract 2509, Harris County, Texas	1.8%
482012509004	Block Group 4, Census Tract 2509, Harris County, Texas	1.8%
482012510001	Block Group 1, Census Tract 2510, Harris County, Texas	24.9%
482012510002	Block Group 2, Census Tract 2510, Harris County, Texas	12.2%
482012511001	Block Group 1, Census Tract 2511, Harris County, Texas	20.1%
482012511002	Block Group 2, Census Tract 2511, Harris County, Texas	35.1%
482012511003	Block Group 3, Census Tract 2511, Harris County, Texas	7.0%
482012511004	Block Group 4, Census Tract 2511, Harris County, Texas	27.6%
482012511005	Block Group 5, Census Tract 2511, Harris County, Texas	38.2%
482012512001	Block Group 1, Census Tract 2512, Harris County, Texas	31.4%
482012512002	Block Group 2, Census Tract 2512, Harris County, Texas	9.7%
482012512003	Block Group 3, Census Tract 2512, Harris County, Texas	17.1%
482012513001	Block Group 1, Census Tract 2513, Harris County, Texas	21.9%
482012513002	Block Group 2, Census Tract 2513, Harris County, Texas	7.7%
482012513003	Block Group 3, Census Tract 2513, Harris County, Texas	0.0%
482012513004	Block Group 4, Census Tract 2513, Harris County, Texas	6.3%
482012513005	Block Group 5, Census Tract 2513, Harris County, Texas	19.6%
482012514011	Block Group 1, Census Tract 2514.01, Harris County, Texas	1.2%
482012514021	Block Group 1, Census Tract 2514.02, Harris County, Texas	35.5%
482012514022	Block Group 2, Census Tract 2514.02, Harris County, Texas	18.9%
482012514023	Block Group 3, Census Tract 2514.02, Harris County, Texas	24.9%
482012515011	Block Group 1, Census Tract 2515.01, Harris County, Texas	9.0%
482012515021	Block Group 1, Census Tract 2515.02, Harris County, Texas	2.9%
482012515022	Block Group 2, Census Tract 2515.02, Harris County, Texas	4.0%
482012515023	Block Group 3, Census Tract 2515.02, Harris County, Texas	17.1%
482012515024	Block Group 4, Census Tract 2515.02, Harris County, Texas	3.3%
482012515025	Block Group 5, Census Tract 2515.02, Harris County, Texas	9.9%
482012515026	Block Group 6, Census Tract 2515.02, Harris County, Texas	37.6%
482012515031	Block Group 1, Census Tract 2515.03, Harris County, Texas	6.1%
482012516001	Block Group 1, Census Tract 2516, Harris County, Texas	38.8%
482012516002	Block Group 2, Census Tract 2516, Harris County, Texas	10.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012517001	Block Group 1, Census Tract 2517, Harris County, Texas	45.5%
482012517002	Block Group 2, Census Tract 2517, Harris County, Texas	44.2%
482012517003	Block Group 3, Census Tract 2517, Harris County, Texas	15.2%
482012517004	Block Group 4, Census Tract 2517, Harris County, Texas	26.5%
482012518001	Block Group 1, Census Tract 2518, Harris County, Texas	32.6%
482012519011	Block Group 1, Census Tract 2519.01, Harris County, Texas	39.7%
482012519012	Block Group 2, Census Tract 2519.01, Harris County, Texas	73.2%
482012519013	Block Group 3, Census Tract 2519.01, Harris County, Texas	20.1%
482012519014	Block Group 4, Census Tract 2519.01, Harris County, Texas	28.2%
482012519021	Block Group 1, Census Tract 2519.02, Harris County, Texas	9.5%
482012519022	Block Group 2, Census Tract 2519.02, Harris County, Texas	32.7%
482012519023	Block Group 3, Census Tract 2519.02, Harris County, Texas	11.5%
482012520001	Block Group 1, Census Tract 2520, Harris County, Texas	10.1%
482012521001	Block Group 1, Census Tract 2521, Harris County, Texas	48.7%
482012522001	Block Group 1, Census Tract 2522, Harris County, Texas	60.9%
482012522002	Block Group 2, Census Tract 2522, Harris County, Texas	37.2%
482012523011	Block Group 1, Census Tract 2523.01, Harris County, Texas	32.9%
482012523012	Block Group 2, Census Tract 2523.01, Harris County, Texas	28.9%
482012523013	Block Group 3, Census Tract 2523.01, Harris County, Texas	49.0%
482012523021	Block Group 1, Census Tract 2523.02, Harris County, Texas	32.0%
482012523022	Block Group 2, Census Tract 2523.02, Harris County, Texas	57.8%
482012523023	Block Group 3, Census Tract 2523.02, Harris County, Texas	39.6%
482012524001	Block Group 1, Census Tract 2524, Harris County, Texas	78.4%
482012524002	Block Group 2, Census Tract 2524, Harris County, Texas	34.1%
482012524003	Block Group 3, Census Tract 2524, Harris County, Texas	87.7%
482012524004	Block Group 4, Census Tract 2524, Harris County, Texas	16.8%
482012525001	Block Group 1, Census Tract 2525, Harris County, Texas	69.4%
482012525002	Block Group 2, Census Tract 2525, Harris County, Texas	71.1%
482012525003	Block Group 3, Census Tract 2525, Harris County, Texas	45.0%
482012525004	Block Group 4, Census Tract 2525, Harris County, Texas	62.3%
482012526001	Block Group 1, Census Tract 2526, Harris County, Texas	78.1%
482012526002	Block Group 2, Census Tract 2526, Harris County, Texas	52.7%
482012526003	Block Group 3, Census Tract 2526, Harris County, Texas	60.6%
482012526004	Block Group 4, Census Tract 2526, Harris County, Texas	55.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012527001	Block Group 1, Census Tract 2527, Harris County, Texas	44.1%
482012527002	Block Group 2, Census Tract 2527, Harris County, Texas	50.2%
482012527003	Block Group 3, Census Tract 2527, Harris County, Texas	10.0%
482012528001	Block Group 1, Census Tract 2528, Harris County, Texas	73.4%
482012528002	Block Group 2, Census Tract 2528, Harris County, Texas	41.5%
482012528003	Block Group 3, Census Tract 2528, Harris County, Texas	51.0%
482012529001	Block Group 1, Census Tract 2529, Harris County, Texas	26.2%
482012529002	Block Group 2, Census Tract 2529, Harris County, Texas	38.8%
482012529003	Block Group 3, Census Tract 2529, Harris County, Texas	28.2%
482012529004	Block Group 4, Census Tract 2529, Harris County, Texas	47.9%
482012529005	Block Group 5, Census Tract 2529, Harris County, Texas	52.8%
482012530001	Block Group 1, Census Tract 2530, Harris County, Texas	64.5%
482012530002	Block Group 2, Census Tract 2530, Harris County, Texas	67.1%
482012530003	Block Group 3, Census Tract 2530, Harris County, Texas	45.3%
482012531001	Block Group 1, Census Tract 2531, Harris County, Texas	21.6%
482012531002	Block Group 2, Census Tract 2531, Harris County, Texas	21.9%
482012532001	Block Group 1, Census Tract 2532, Harris County, Texas	65.9%
482012532002	Block Group 2, Census Tract 2532, Harris County, Texas	70.8%
482012532003	Block Group 3, Census Tract 2532, Harris County, Texas	19.1%
482012532004	Block Group 4, Census Tract 2532, Harris County, Texas	17.1%
482012532005	Block Group 5, Census Tract 2532, Harris County, Texas	15.0%
482012533001	Block Group 1, Census Tract 2533, Harris County, Texas	11.6%
482012533002	Block Group 2, Census Tract 2533, Harris County, Texas	41.2%
482012534001	Block Group 1, Census Tract 2534, Harris County, Texas	73.2%
482012535001	Block Group 1, Census Tract 2535, Harris County, Texas	25.4%
482012535002	Block Group 2, Census Tract 2535, Harris County, Texas	51.7%
482012535003	Block Group 3, Census Tract 2535, Harris County, Texas	73.6%
482012535004	Block Group 4, Census Tract 2535, Harris County, Texas	18.5%
482012536001	Block Group 1, Census Tract 2536, Harris County, Texas	23.7%
482012536002	Block Group 2, Census Tract 2536, Harris County, Texas	67.1%
482012536003	Block Group 3, Census Tract 2536, Harris County, Texas	15.2%
482012536004	Block Group 4, Census Tract 2536, Harris County, Texas	91.6%
482012537001	Block Group 1, Census Tract 2537, Harris County, Texas	37.8%
482012537002	Block Group 2, Census Tract 2537, Harris County, Texas	28.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482012537003	Block Group 3, Census Tract 2537, Harris County, Texas	41.9%
482012537004	Block Group 4, Census Tract 2537, Harris County, Texas	40.3%
482012538001	Block Group 1, Census Tract 2538, Harris County, Texas	51.5%
482012538002	Block Group 2, Census Tract 2538, Harris County, Texas	26.1%
482012538003	Block Group 3, Census Tract 2538, Harris County, Texas	64.2%
482012538004	Block Group 4, Census Tract 2538, Harris County, Texas	64.0%
482012539001	Block Group 1, Census Tract 2539, Harris County, Texas	51.8%
482012539002	Block Group 2, Census Tract 2539, Harris County, Texas	51.6%
482012539003	Block Group 3, Census Tract 2539, Harris County, Texas	23.7%
482012540001	Block Group 1, Census Tract 2540, Harris County, Texas	70.4%
482012540002	Block Group 2, Census Tract 2540, Harris County, Texas	37.9%
482012541001	Block Group 1, Census Tract 2541, Harris County, Texas	80.0%
482012541002	Block Group 2, Census Tract 2541, Harris County, Texas	48.7%
482012541003	Block Group 3, Census Tract 2541, Harris County, Texas	83.4%
482012541004	Block Group 4, Census Tract 2541, Harris County, Texas	80.3%
482012542001	Block Group 1, Census Tract 2542, Harris County, Texas	50.9%
482012542002	Block Group 2, Census Tract 2542, Harris County, Texas	49.0%
482012542003	Block Group 3, Census Tract 2542, Harris County, Texas	80.3%
482012543001	Block Group 1, Census Tract 2543, Harris County, Texas	42.8%
482012543002	Block Group 2, Census Tract 2543, Harris County, Texas	63.3%
482012543003	Block Group 3, Census Tract 2543, Harris County, Texas	65.4%
482012543004	Block Group 4, Census Tract 2543, Harris County, Texas	60.2%
482012544001	Block Group 1, Census Tract 2544, Harris County, Texas	60.6%
482012544002	Block Group 2, Census Tract 2544, Harris County, Texas	59.6%
482012544003	Block Group 3, Census Tract 2544, Harris County, Texas	69.4%
482012544004	Block Group 4, Census Tract 2544, Harris County, Texas	33.3%
482012545001	Block Group 1, Census Tract 2545, Harris County, Texas	63.4%
482012545002	Block Group 2, Census Tract 2545, Harris County, Texas	58.3%
482012546001	Block Group 1, Census Tract 2546, Harris County, Texas	55.2%
482012546002	Block Group 2, Census Tract 2546, Harris County, Texas	51.8%
482012546003	Block Group 3, Census Tract 2546, Harris County, Texas	59.6%
482012547001	Block Group 1, Census Tract 2547, Harris County, Texas	27.5%
482013101001	Block Group 1, Census Tract 3101, Harris County, Texas	75.9%
482013101002	Block Group 2, Census Tract 3101, Harris County, Texas	47.5%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013102001	Block Group 1, Census Tract 3102, Harris County, Texas	41.7%
482013103001	Block Group 1, Census Tract 3103, Harris County, Texas	57.4%
482013103002	Block Group 2, Census Tract 3103, Harris County, Texas	60.6%
482013103003	Block Group 3, Census Tract 3103, Harris County, Texas	51.1%
482013103004	Block Group 4, Census Tract 3103, Harris County, Texas	44.5%
482013103005	Block Group 5, Census Tract 3103, Harris County, Texas	59.2%
482013103006	Block Group 6, Census Tract 3103, Harris County, Texas	67.6%
482013104001	Block Group 1, Census Tract 3104, Harris County, Texas	65.6%
482013104002	Block Group 2, Census Tract 3104, Harris County, Texas	91.8%
482013104003	Block Group 3, Census Tract 3104, Harris County, Texas	63.9%
482013105001	Block Group 1, Census Tract 3105, Harris County, Texas	47.8%
482013105002	Block Group 2, Census Tract 3105, Harris County, Texas	78.9%
482013105003	Block Group 3, Census Tract 3105, Harris County, Texas	76.5%
482013106001	Block Group 1, Census Tract 3106, Harris County, Texas	58.0%
482013106002	Block Group 2, Census Tract 3106, Harris County, Texas	62.7%
482013106003	Block Group 3, Census Tract 3106, Harris County, Texas	78.8%
482013106004	Block Group 4, Census Tract 3106, Harris County, Texas	49.5%
482013106005	Block Group 5, Census Tract 3106, Harris County, Texas	77.5%
482013107001	Block Group 1, Census Tract 3107, Harris County, Texas	65.4%
482013107002	Block Group 2, Census Tract 3107, Harris County, Texas	69.1%
482013108001	Block Group 1, Census Tract 3108, Harris County, Texas	84.7%
482013108002	Block Group 2, Census Tract 3108, Harris County, Texas	64.5%
482013109001	Block Group 1, Census Tract 3109, Harris County, Texas	56.2%
482013109002	Block Group 2, Census Tract 3109, Harris County, Texas	54.3%
482013109003	Block Group 3, Census Tract 3109, Harris County, Texas	71.6%
482013109004	Block Group 4, Census Tract 3109, Harris County, Texas	77.4%
482013109005	Block Group 5, Census Tract 3109, Harris County, Texas	68.1%
482013110001	Block Group 1, Census Tract 3110, Harris County, Texas	63.4%
482013110002	Block Group 2, Census Tract 3110, Harris County, Texas	76.3%
482013110003	Block Group 3, Census Tract 3110, Harris County, Texas	83.5%
482013110004	Block Group 4, Census Tract 3110, Harris County, Texas	78.2%
482013110005	Block Group 5, Census Tract 3110, Harris County, Texas	55.3%
482013111001	Block Group 1, Census Tract 3111, Harris County, Texas	78.7%
482013111002	Block Group 2, Census Tract 3111, Harris County, Texas	49.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013111003	Block Group 3, Census Tract 3111, Harris County, Texas	82.2%
482013111004	Block Group 4, Census Tract 3111, Harris County, Texas	73.2%
482013112001	Block Group 1, Census Tract 3112, Harris County, Texas	62.8%
482013112002	Block Group 2, Census Tract 3112, Harris County, Texas	84.3%
482013112003	Block Group 3, Census Tract 3112, Harris County, Texas	52.1%
482013113001	Block Group 1, Census Tract 3113, Harris County, Texas	65.2%
482013113002	Block Group 2, Census Tract 3113, Harris County, Texas	48.1%
482013113003	Block Group 3, Census Tract 3113, Harris County, Texas	69.0%
482013114001	Block Group 1, Census Tract 3114, Harris County, Texas	73.7%
482013115001	Block Group 1, Census Tract 3115, Harris County, Texas	68.9%
482013115002	Block Group 2, Census Tract 3115, Harris County, Texas	82.5%
482013115003	Block Group 3, Census Tract 3115, Harris County, Texas	59.0%
482013115004	Block Group 4, Census Tract 3115, Harris County, Texas	38.1%
482013116001	Block Group 1, Census Tract 3116, Harris County, Texas	91.6%
482013116002	Block Group 2, Census Tract 3116, Harris County, Texas	84.4%
482013116003	Block Group 3, Census Tract 3116, Harris County, Texas	65.0%
482013117001	Block Group 1, Census Tract 3117, Harris County, Texas	85.9%
482013117002	Block Group 2, Census Tract 3117, Harris County, Texas	64.4%
482013118001	Block Group 1, Census Tract 3118, Harris County, Texas	78.6%
482013118002	Block Group 2, Census Tract 3118, Harris County, Texas	38.6%
482013118003	Block Group 3, Census Tract 3118, Harris County, Texas	75.3%
482013119001	Block Group 1, Census Tract 3119, Harris County, Texas	30.0%
482013119002	Block Group 2, Census Tract 3119, Harris County, Texas	69.4%
482013120001	Block Group 1, Census Tract 3120, Harris County, Texas	43.3%
482013120002	Block Group 2, Census Tract 3120, Harris County, Texas	62.7%
482013121001	Block Group 1, Census Tract 3121, Harris County, Texas	0.0%
482013122001	Block Group 1, Census Tract 3122, Harris County, Texas	95.6%
482013122002	Block Group 2, Census Tract 3122, Harris County, Texas	95.9%
482013122003	Block Group 3, Census Tract 3122, Harris County, Texas	91.1%
482013123001	Block Group 1, Census Tract 3123, Harris County, Texas	72.9%
482013123002	Block Group 2, Census Tract 3123, Harris County, Texas	98.5%
482013124001	Block Group 1, Census Tract 3124, Harris County, Texas	100.0%
482013124002	Block Group 2, Census Tract 3124, Harris County, Texas	83.5%
482013124003	Block Group 3, Census Tract 3124, Harris County, Texas	81.4%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013125001	Block Group 1, Census Tract 3125, Harris County, Texas	19.9%
482013125002	Block Group 2, Census Tract 3125, Harris County, Texas	34.8%
482013126001	Block Group 1, Census Tract 3126, Harris County, Texas	41.2%
482013126002	Block Group 2, Census Tract 3126, Harris County, Texas	27.6%
482013126003	Block Group 3, Census Tract 3126, Harris County, Texas	77.3%
482013126004	Block Group 4, Census Tract 3126, Harris County, Texas	22.3%
482013127001	Block Group 1, Census Tract 3127, Harris County, Texas	16.9%
482013127002	Block Group 2, Census Tract 3127, Harris County, Texas	56.3%
482013127003	Block Group 3, Census Tract 3127, Harris County, Texas	74.7%
482013128001	Block Group 1, Census Tract 3128, Harris County, Texas	96.0%
482013128002	Block Group 2, Census Tract 3128, Harris County, Texas	82.4%
482013129001	Block Group 1, Census Tract 3129, Harris County, Texas	76.3%
482013129002	Block Group 2, Census Tract 3129, Harris County, Texas	45.7%
482013130001	Block Group 1, Census Tract 3130, Harris County, Texas	43.1%
482013130002	Block Group 2, Census Tract 3130, Harris County, Texas	55.1%
482013130003	Block Group 3, Census Tract 3130, Harris County, Texas	49.7%
482013131001	Block Group 1, Census Tract 3131, Harris County, Texas	22.4%
482013131002	Block Group 2, Census Tract 3131, Harris County, Texas	18.8%
482013132001	Block Group 1, Census Tract 3132, Harris County, Texas	22.8%
482013132002	Block Group 2, Census Tract 3132, Harris County, Texas	65.7%
482013132003	Block Group 3, Census Tract 3132, Harris County, Texas	71.0%
482013132004	Block Group 4, Census Tract 3132, Harris County, Texas	45.6%
482013133001	Block Group 1, Census Tract 3133, Harris County, Texas	69.1%
482013133002	Block Group 2, Census Tract 3133, Harris County, Texas	47.8%
482013134001	Block Group 1, Census Tract 3134, Harris County, Texas	62.0%
482013134002	Block Group 2, Census Tract 3134, Harris County, Texas	79.7%
482013135001	Block Group 1, Census Tract 3135, Harris County, Texas	64.5%
482013135002	Block Group 2, Census Tract 3135, Harris County, Texas	73.5%
482013135003	Block Group 3, Census Tract 3135, Harris County, Texas	15.6%
482013136001	Block Group 1, Census Tract 3136, Harris County, Texas	63.8%
482013136002	Block Group 2, Census Tract 3136, Harris County, Texas	86.7%
482013136003	Block Group 3, Census Tract 3136, Harris County, Texas	64.8%
482013137001	Block Group 1, Census Tract 3137, Harris County, Texas	51.1%
482013137002	Block Group 2, Census Tract 3137, Harris County, Texas	50.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013138001	Block Group 1, Census Tract 3138, Harris County, Texas	89.7%
482013138002	Block Group 2, Census Tract 3138, Harris County, Texas	70.9%
482013138003	Block Group 3, Census Tract 3138, Harris County, Texas	66.2%
482013138004	Block Group 4, Census Tract 3138, Harris County, Texas	78.1%
482013139001	Block Group 1, Census Tract 3139, Harris County, Texas	35.8%
482013139002	Block Group 2, Census Tract 3139, Harris County, Texas	53.4%
482013139003	Block Group 3, Census Tract 3139, Harris County, Texas	29.2%
482013140011	Block Group 1, Census Tract 3140.01, Harris County, Texas	87.1%
482013140012	Block Group 2, Census Tract 3140.01, Harris County, Texas	59.6%
482013140013	Block Group 3, Census Tract 3140.01, Harris County, Texas	42.5%
482013140021	Block Group 1, Census Tract 3140.02, Harris County, Texas	65.5%
482013140022	Block Group 2, Census Tract 3140.02, Harris County, Texas	58.7%
482013140023	Block Group 3, Census Tract 3140.02, Harris County, Texas	25.3%
482013140024	Block Group 4, Census Tract 3140.02, Harris County, Texas	74.1%
482013140025	Block Group 5, Census Tract 3140.02, Harris County, Texas	54.6%
482013143001	Block Group 1, Census Tract 3143, Harris County, Texas	60.8%
482013143002	Block Group 2, Census Tract 3143, Harris County, Texas	79.6%
482013143003	Block Group 3, Census Tract 3143, Harris County, Texas	76.4%
482013144001	Block Group 1, Census Tract 3144, Harris County, Texas	23.7%
482013144002	Block Group 2, Census Tract 3144, Harris County, Texas	49.1%
482013201001	Block Group 1, Census Tract 3201, Harris County, Texas	73.1%
482013201002	Block Group 2, Census Tract 3201, Harris County, Texas	53.5%
482013202001	Block Group 1, Census Tract 3202, Harris County, Texas	56.2%
482013202002	Block Group 2, Census Tract 3202, Harris County, Texas	80.3%
482013202003	Block Group 3, Census Tract 3202, Harris County, Texas	51.8%
482013202004	Block Group 4, Census Tract 3202, Harris County, Texas	87.3%
482013205001	Block Group 1, Census Tract 3205, Harris County, Texas	64.4%
482013205002	Block Group 2, Census Tract 3205, Harris County, Texas	38.0%
482013206011	Block Group 1, Census Tract 3206.01, Harris County, Texas	59.9%
482013206021	Block Group 1, Census Tract 3206.02, Harris County, Texas	79.3%
482013206022	Block Group 2, Census Tract 3206.02, Harris County, Texas	51.2%
482013206023	Block Group 3, Census Tract 3206.02, Harris County, Texas	91.6%
482013207001	Block Group 1, Census Tract 3207, Harris County, Texas	59.5%
482013207002	Block Group 2, Census Tract 3207, Harris County, Texas	63.9%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013208001	Block Group 1, Census Tract 3208, Harris County, Texas	84.8%
482013208002	Block Group 2, Census Tract 3208, Harris County, Texas	84.7%
482013208003	Block Group 3, Census Tract 3208, Harris County, Texas	49.2%
482013209001	Block Group 1, Census Tract 3209, Harris County, Texas	81.6%
482013209002	Block Group 2, Census Tract 3209, Harris County, Texas	62.3%
482013209003	Block Group 3, Census Tract 3209, Harris County, Texas	44.1%
482013209004	Block Group 4, Census Tract 3209, Harris County, Texas	52.6%
482013210001	Block Group 1, Census Tract 3210, Harris County, Texas	34.0%
482013210002	Block Group 2, Census Tract 3210, Harris County, Texas	68.4%
482013210003	Block Group 3, Census Tract 3210, Harris County, Texas	74.6%
482013210004	Block Group 4, Census Tract 3210, Harris County, Texas	61.4%
482013210005	Block Group 5, Census Tract 3210, Harris County, Texas	36.7%
482013211001	Block Group 1, Census Tract 3211, Harris County, Texas	55.7%
482013211002	Block Group 2, Census Tract 3211, Harris County, Texas	39.8%
482013211003	Block Group 3, Census Tract 3211, Harris County, Texas	83.1%
482013212001	Block Group 1, Census Tract 3212, Harris County, Texas	83.5%
482013212002	Block Group 2, Census Tract 3212, Harris County, Texas	69.8%
482013213001	Block Group 1, Census Tract 3213, Harris County, Texas	67.8%
482013213002	Block Group 2, Census Tract 3213, Harris County, Texas	79.0%
482013213003	Block Group 3, Census Tract 3213, Harris County, Texas	40.6%
482013214011	Block Group 1, Census Tract 3214.01, Harris County, Texas	56.1%
482013214012	Block Group 2, Census Tract 3214.01, Harris County, Texas	54.9%
482013214021	Block Group 1, Census Tract 3214.02, Harris County, Texas	42.2%
482013214022	Block Group 2, Census Tract 3214.02, Harris County, Texas	11.2%
482013214023	Block Group 3, Census Tract 3214.02, Harris County, Texas	62.7%
482013215001	Block Group 1, Census Tract 3215, Harris County, Texas	68.6%
482013216001	Block Group 1, Census Tract 3216, Harris County, Texas	46.0%
482013216002	Block Group 2, Census Tract 3216, Harris County, Texas	20.4%
482013216003	Block Group 3, Census Tract 3216, Harris County, Texas	52.2%
482013216004	Block Group 4, Census Tract 3216, Harris County, Texas	38.7%
482013216005	Block Group 5, Census Tract 3216, Harris County, Texas	62.3%
482013217001	Block Group 1, Census Tract 3217, Harris County, Texas	37.5%
482013217002	Block Group 2, Census Tract 3217, Harris County, Texas	37.8%
482013218001	Block Group 1, Census Tract 3218, Harris County, Texas	59.0%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013218002	Block Group 2, Census Tract 3218, Harris County, Texas	66.6%
482013219001	Block Group 1, Census Tract 3219, Harris County, Texas	86.7%
482013219002	Block Group 2, Census Tract 3219, Harris County, Texas	75.8%
482013219003	Block Group 3, Census Tract 3219, Harris County, Texas	60.2%
482013219004	Block Group 4, Census Tract 3219, Harris County, Texas	42.2%
482013220001	Block Group 1, Census Tract 3220, Harris County, Texas	92.1%
482013220002	Block Group 2, Census Tract 3220, Harris County, Texas	56.5%
482013220003	Block Group 3, Census Tract 3220, Harris County, Texas	87.5%
482013221001	Block Group 1, Census Tract 3221, Harris County, Texas	68.2%
482013221002	Block Group 2, Census Tract 3221, Harris County, Texas	60.4%
482013221003	Block Group 3, Census Tract 3221, Harris County, Texas	66.5%
482013222001	Block Group 1, Census Tract 3222, Harris County, Texas	53.5%
482013226001	Block Group 1, Census Tract 3226, Harris County, Texas	19.9%
482013226002	Block Group 2, Census Tract 3226, Harris County, Texas	31.6%
482013226003	Block Group 3, Census Tract 3226, Harris County, Texas	47.5%
482013227001	Block Group 1, Census Tract 3227, Harris County, Texas	37.0%
482013227002	Block Group 2, Census Tract 3227, Harris County, Texas	85.4%
482013227003	Block Group 3, Census Tract 3227, Harris County, Texas	56.7%
482013227004	Block Group 4, Census Tract 3227, Harris County, Texas	69.1%
482013228001	Block Group 1, Census Tract 3228, Harris County, Texas	74.0%
482013228002	Block Group 2, Census Tract 3228, Harris County, Texas	52.3%
482013228003	Block Group 3, Census Tract 3228, Harris County, Texas	70.1%
482013228004	Block Group 4, Census Tract 3228, Harris County, Texas	62.4%
482013229001	Block Group 1, Census Tract 3229, Harris County, Texas	69.1%
482013229002	Block Group 2, Census Tract 3229, Harris County, Texas	22.4%
482013229003	Block Group 3, Census Tract 3229, Harris County, Texas	40.6%
482013230001	Block Group 1, Census Tract 3230, Harris County, Texas	78.4%
482013230002	Block Group 2, Census Tract 3230, Harris County, Texas	67.0%
482013230003	Block Group 3, Census Tract 3230, Harris County, Texas	85.8%
482013231001	Block Group 1, Census Tract 3231, Harris County, Texas	65.7%
482013231002	Block Group 2, Census Tract 3231, Harris County, Texas	70.9%
482013232001	Block Group 1, Census Tract 3232, Harris County, Texas	41.3%
482013232002	Block Group 2, Census Tract 3232, Harris County, Texas	59.8%
482013232003	Block Group 3, Census Tract 3232, Harris County, Texas	41.0%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013232004	Block Group 4, Census Tract 3232, Harris County, Texas	51.5%
482013233001	Block Group 1, Census Tract 3233, Harris County, Texas	70.3%
482013233002	Block Group 2, Census Tract 3233, Harris County, Texas	54.6%
482013234001	Block Group 1, Census Tract 3234, Harris County, Texas	64.1%
482013234002	Block Group 2, Census Tract 3234, Harris County, Texas	55.5%
482013234003	Block Group 3, Census Tract 3234, Harris County, Texas	87.9%
482013234004	Block Group 4, Census Tract 3234, Harris County, Texas	77.2%
482013235001	Block Group 1, Census Tract 3235, Harris County, Texas	73.8%
482013235002	Block Group 2, Census Tract 3235, Harris County, Texas	74.1%
482013235003	Block Group 3, Census Tract 3235, Harris County, Texas	64.9%
482013236001	Block Group 1, Census Tract 3236, Harris County, Texas	76.4%
482013236002	Block Group 2, Census Tract 3236, Harris County, Texas	59.2%
482013236003	Block Group 3, Census Tract 3236, Harris County, Texas	14.7%
482013236004	Block Group 4, Census Tract 3236, Harris County, Texas	38.0%
482013237011	Block Group 1, Census Tract 3237.01, Harris County, Texas	93.1%
482013237012	Block Group 2, Census Tract 3237.01, Harris County, Texas	15.7%
482013237013	Block Group 3, Census Tract 3237.01, Harris County, Texas	58.2%
482013237021	Block Group 1, Census Tract 3237.02, Harris County, Texas	32.2%
482013237022	Block Group 2, Census Tract 3237.02, Harris County, Texas	47.7%
482013238011	Block Group 1, Census Tract 3238.01, Harris County, Texas	59.6%
482013238012	Block Group 2, Census Tract 3238.01, Harris County, Texas	42.6%
482013238021	Block Group 1, Census Tract 3238.02, Harris County, Texas	62.0%
482013238022	Block Group 2, Census Tract 3238.02, Harris County, Texas	42.7%
482013239001	Block Group 1, Census Tract 3239, Harris County, Texas	91.1%
482013239002	Block Group 2, Census Tract 3239, Harris County, Texas	75.2%
482013240001	Block Group 1, Census Tract 3240, Harris County, Texas	42.5%
482013240002	Block Group 2, Census Tract 3240, Harris County, Texas	27.3%
482013241001	Block Group 1, Census Tract 3241, Harris County, Texas	66.7%
482013241002	Block Group 2, Census Tract 3241, Harris County, Texas	81.7%
482013241003	Block Group 3, Census Tract 3241, Harris County, Texas	77.9%
482013241004	Block Group 4, Census Tract 3241, Harris County, Texas	60.2%
482013241005	Block Group 5, Census Tract 3241, Harris County, Texas	42.9%
482013242001	Block Group 1, Census Tract 3242, Harris County, Texas	60.0%
482013301001	Block Group 1, Census Tract 3301, Harris County, Texas	49.5%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013301002	Block Group 2, Census Tract 3301, Harris County, Texas	77.6%
482013301003	Block Group 3, Census Tract 3301, Harris County, Texas	74.7%
482013301004	Block Group 4, Census Tract 3301, Harris County, Texas	49.5%
482013302001	Block Group 1, Census Tract 3302, Harris County, Texas	48.3%
482013302002	Block Group 2, Census Tract 3302, Harris County, Texas	49.2%
482013303011	Block Group 1, Census Tract 3303.01, Harris County, Texas	49.8%
482013303012	Block Group 2, Census Tract 3303.01, Harris County, Texas	43.0%
482013303021	Block Group 1, Census Tract 3303.02, Harris County, Texas	55.9%
482013303022	Block Group 2, Census Tract 3303.02, Harris County, Texas	64.8%
482013303023	Block Group 3, Census Tract 3303.02, Harris County, Texas	52.7%
482013303031	Block Group 1, Census Tract 3303.03, Harris County, Texas	92.3%
482013303032	Block Group 2, Census Tract 3303.03, Harris County, Texas	36.1%
482013303033	Block Group 3, Census Tract 3303.03, Harris County, Texas	24.6%
482013304001	Block Group 1, Census Tract 3304, Harris County, Texas	62.8%
482013304002	Block Group 2, Census Tract 3304, Harris County, Texas	54.2%
482013304003	Block Group 3, Census Tract 3304, Harris County, Texas	70.7%
482013305001	Block Group 1, Census Tract 3305, Harris County, Texas	80.6%
482013305002	Block Group 2, Census Tract 3305, Harris County, Texas	33.4%
482013305003	Block Group 3, Census Tract 3305, Harris County, Texas	56.5%
482013306001	Block Group 1, Census Tract 3306, Harris County, Texas	56.3%
482013306002	Block Group 2, Census Tract 3306, Harris County, Texas	52.1%
482013306003	Block Group 3, Census Tract 3306, Harris County, Texas	39.1%
482013306004	Block Group 4, Census Tract 3306, Harris County, Texas	53.4%
482013307001	Block Group 1, Census Tract 3307, Harris County, Texas	73.0%
482013307002	Block Group 2, Census Tract 3307, Harris County, Texas	52.5%
482013307003	Block Group 3, Census Tract 3307, Harris County, Texas	79.3%
482013308001	Block Group 1, Census Tract 3308, Harris County, Texas	66.0%
482013308002	Block Group 2, Census Tract 3308, Harris County, Texas	32.4%
482013309001	Block Group 1, Census Tract 3309, Harris County, Texas	32.5%
482013309002	Block Group 2, Census Tract 3309, Harris County, Texas	61.2%
482013309003	Block Group 3, Census Tract 3309, Harris County, Texas	49.8%
482013311001	Block Group 1, Census Tract 3311, Harris County, Texas	68.9%
482013311002	Block Group 2, Census Tract 3311, Harris County, Texas	35.1%
482013311003	Block Group 3, Census Tract 3311, Harris County, Texas	86.7%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013311004	Block Group 4, Census Tract 3311, Harris County, Texas	86.8%
482013312001	Block Group 1, Census Tract 3312, Harris County, Texas	76.8%
482013312002	Block Group 2, Census Tract 3312, Harris County, Texas	87.5%
482013313001	Block Group 1, Census Tract 3313, Harris County, Texas	46.2%
482013313002	Block Group 2, Census Tract 3313, Harris County, Texas	94.7%
482013313003	Block Group 3, Census Tract 3313, Harris County, Texas	60.6%
482013313004	Block Group 4, Census Tract 3313, Harris County, Texas	61.5%
482013314001	Block Group 1, Census Tract 3314, Harris County, Texas	81.8%
482013315001	Block Group 1, Census Tract 3315, Harris County, Texas	84.1%
482013315002	Block Group 2, Census Tract 3315, Harris County, Texas	73.2%
482013315003	Block Group 3, Census Tract 3315, Harris County, Texas	47.5%
482013315004	Block Group 4, Census Tract 3315, Harris County, Texas	46.4%
482013315005	Block Group 5, Census Tract 3315, Harris County, Texas	40.7%
482013315006	Block Group 6, Census Tract 3315, Harris County, Texas	58.0%
482013316011	Block Group 1, Census Tract 3316.01, Harris County, Texas	52.5%
482013316012	Block Group 2, Census Tract 3316.01, Harris County, Texas	69.1%
482013316013	Block Group 3, Census Tract 3316.01, Harris County, Texas	23.6%
482013316014	Block Group 4, Census Tract 3316.01, Harris County, Texas	22.9%
482013316021	Block Group 1, Census Tract 3316.02, Harris County, Texas	100.0%
482013316022	Block Group 2, Census Tract 3316.02, Harris County, Texas	87.2%
482013317001	Block Group 1, Census Tract 3317, Harris County, Texas	80.8%
482013317002	Block Group 2, Census Tract 3317, Harris County, Texas	65.4%
482013317003	Block Group 3, Census Tract 3317, Harris County, Texas	78.1%
482013318001	Block Group 1, Census Tract 3318, Harris County, Texas	72.7%
482013318002	Block Group 2, Census Tract 3318, Harris County, Texas	58.5%
482013319001	Block Group 1, Census Tract 3319, Harris County, Texas	75.5%
482013319002	Block Group 2, Census Tract 3319, Harris County, Texas	51.9%
482013319003	Block Group 3, Census Tract 3319, Harris County, Texas	75.4%
482013320001	Block Group 1, Census Tract 3320, Harris County, Texas	54.7%
482013320002	Block Group 2, Census Tract 3320, Harris County, Texas	81.3%
482013320003	Block Group 3, Census Tract 3320, Harris County, Texas	91.4%
482013320004	Block Group 4, Census Tract 3320, Harris County, Texas	42.7%
482013321001	Block Group 1, Census Tract 3321, Harris County, Texas	83.1%
482013321002	Block Group 2, Census Tract 3321, Harris County, Texas	59.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013322001	Block Group 1, Census Tract 3322, Harris County, Texas	73.5%
482013322002	Block Group 2, Census Tract 3322, Harris County, Texas	68.7%
482013322003	Block Group 3, Census Tract 3322, Harris County, Texas	51.5%
482013323001	Block Group 1, Census Tract 3323, Harris County, Texas	53.0%
482013323002	Block Group 2, Census Tract 3323, Harris County, Texas	67.5%
482013324001	Block Group 1, Census Tract 3324, Harris County, Texas	58.7%
482013324002	Block Group 2, Census Tract 3324, Harris County, Texas	55.1%
482013324003	Block Group 3, Census Tract 3324, Harris County, Texas	63.2%
482013325001	Block Group 1, Census Tract 3325, Harris County, Texas	64.5%
482013325002	Block Group 2, Census Tract 3325, Harris County, Texas	43.3%
482013326001	Block Group 1, Census Tract 3326, Harris County, Texas	54.6%
482013326002	Block Group 2, Census Tract 3326, Harris County, Texas	59.0%
482013326003	Block Group 3, Census Tract 3326, Harris County, Texas	40.5%
482013326004	Block Group 4, Census Tract 3326, Harris County, Texas	57.5%
482013327001	Block Group 1, Census Tract 3327, Harris County, Texas	66.4%
482013327002	Block Group 2, Census Tract 3327, Harris County, Texas	66.8%
482013328001	Block Group 1, Census Tract 3328, Harris County, Texas	83.8%
482013328002	Block Group 2, Census Tract 3328, Harris County, Texas	80.2%
482013328003	Block Group 3, Census Tract 3328, Harris County, Texas	79.3%
482013329001	Block Group 1, Census Tract 3329, Harris County, Texas	79.4%
482013329002	Block Group 2, Census Tract 3329, Harris County, Texas	56.2%
482013330001	Block Group 1, Census Tract 3330, Harris County, Texas	44.4%
482013330002	Block Group 2, Census Tract 3330, Harris County, Texas	41.8%
482013331001	Block Group 1, Census Tract 3331, Harris County, Texas	76.8%
482013331002	Block Group 2, Census Tract 3331, Harris County, Texas	79.1%
482013332011	Block Group 1, Census Tract 3332.01, Harris County, Texas	61.6%
482013332012	Block Group 2, Census Tract 3332.01, Harris County, Texas	80.7%
482013332013	Block Group 3, Census Tract 3332.01, Harris County, Texas	60.4%
482013332021	Block Group 1, Census Tract 3332.02, Harris County, Texas	47.1%
482013332022	Block Group 2, Census Tract 3332.02, Harris County, Texas	69.2%
482013332023	Block Group 3, Census Tract 3332.02, Harris County, Texas	78.9%
482013332024	Block Group 4, Census Tract 3332.02, Harris County, Texas	71.9%
482013333001	Block Group 1, Census Tract 3333, Harris County, Texas	57.1%
482013333002	Block Group 2, Census Tract 3333, Harris County, Texas	77.4%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013333003	Block Group 3, Census Tract 3333, Harris County, Texas	54.2%
482013335001	Block Group 1, Census Tract 3335, Harris County, Texas	49.7%
482013335002	Block Group 2, Census Tract 3335, Harris County, Texas	57.0%
482013335003	Block Group 3, Census Tract 3335, Harris County, Texas	81.8%
482013336001	Block Group 1, Census Tract 3336, Harris County, Texas	48.0%
482013336002	Block Group 2, Census Tract 3336, Harris County, Texas	41.1%
482013336003	Block Group 3, Census Tract 3336, Harris County, Texas	25.3%
482013337001	Block Group 1, Census Tract 3337, Harris County, Texas	42.9%
482013337002	Block Group 2, Census Tract 3337, Harris County, Texas	37.4%
482013338001	Block Group 1, Census Tract 3338, Harris County, Texas	65.9%
482013338002	Block Group 2, Census Tract 3338, Harris County, Texas	54.2%
482013338003	Block Group 3, Census Tract 3338, Harris County, Texas	89.7%
482013338004	Block Group 4, Census Tract 3338, Harris County, Texas	66.2%
482013338005	Block Group 5, Census Tract 3338, Harris County, Texas	24.6%
482013339011	Block Group 1, Census Tract 3339.01, Harris County, Texas	35.9%
482013339012	Block Group 2, Census Tract 3339.01, Harris County, Texas	22.1%
482013339021	Block Group 1, Census Tract 3339.02, Harris County, Texas	59.2%
482013339022	Block Group 2, Census Tract 3339.02, Harris County, Texas	34.3%
482013339023	Block Group 3, Census Tract 3339.02, Harris County, Texas	49.6%
482013340011	Block Group 1, Census Tract 3340.01, Harris County, Texas	77.2%
482013340012	Block Group 2, Census Tract 3340.01, Harris County, Texas	53.6%
482013340021	Block Group 1, Census Tract 3340.02, Harris County, Texas	15.0%
482013340022	Block Group 2, Census Tract 3340.02, Harris County, Texas	45.4%
482013340031	Block Group 1, Census Tract 3340.03, Harris County, Texas	31.5%
482013340032	Block Group 2, Census Tract 3340.03, Harris County, Texas	46.8%
482013340033	Block Group 3, Census Tract 3340.03, Harris County, Texas	43.8%
482013341001	Block Group 1, Census Tract 3341, Harris County, Texas	44.0%
482013341002	Block Group 2, Census Tract 3341, Harris County, Texas	51.8%
482013341003	Block Group 3, Census Tract 3341, Harris County, Texas	44.5%
482013341004	Block Group 4, Census Tract 3341, Harris County, Texas	30.7%
482013401001	Block Group 1, Census Tract 3401, Harris County, Texas	36.5%
482013401002	Block Group 2, Census Tract 3401, Harris County, Texas	69.8%
482013402011	Block Group 1, Census Tract 3402.01, Harris County, Texas	6.3%
482013402012	Block Group 2, Census Tract 3402.01, Harris County, Texas	31.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013402021	Block Group 1, Census Tract 3402.02, Harris County, Texas	8.0%
482013402022	Block Group 2, Census Tract 3402.02, Harris County, Texas	2.9%
482013402031	Block Group 1, Census Tract 3402.03, Harris County, Texas	0.0%
482013402032	Block Group 2, Census Tract 3402.03, Harris County, Texas	6.7%
482013403011	Block Group 1, Census Tract 3403.01, Harris County, Texas	4.4%
482013403012	Block Group 2, Census Tract 3403.01, Harris County, Texas	5.6%
482013403021	Block Group 1, Census Tract 3403.02, Harris County, Texas	16.3%
482013403022	Block Group 2, Census Tract 3403.02, Harris County, Texas	12.1%
482013403023	Block Group 3, Census Tract 3403.02, Harris County, Texas	6.9%
482013404001	Block Group 1, Census Tract 3404, Harris County, Texas	0.7%
482013405001	Block Group 1, Census Tract 3405, Harris County, Texas	76.2%
482013405002	Block Group 2, Census Tract 3405, Harris County, Texas	56.2%
482013405003	Block Group 3, Census Tract 3405, Harris County, Texas	35.3%
482013405004	Block Group 4, Census Tract 3405, Harris County, Texas	14.0%
482013405005	Block Group 5, Census Tract 3405, Harris County, Texas	15.1%
482013406001	Block Group 1, Census Tract 3406, Harris County, Texas	15.4%
482013406002	Block Group 2, Census Tract 3406, Harris County, Texas	11.9%
482013407001	Block Group 1, Census Tract 3407, Harris County, Texas	36.2%
482013407002	Block Group 2, Census Tract 3407, Harris County, Texas	30.0%
482013407003	Block Group 3, Census Tract 3407, Harris County, Texas	64.8%
482013407004	Block Group 4, Census Tract 3407, Harris County, Texas	9.0%
482013408001	Block Group 1, Census Tract 3408, Harris County, Texas	0.0%
482013408002	Block Group 2, Census Tract 3408, Harris County, Texas	13.9%
482013408003	Block Group 3, Census Tract 3408, Harris County, Texas	14.8%
482013409001	Block Group 1, Census Tract 3409, Harris County, Texas	57.5%
482013409002	Block Group 2, Census Tract 3409, Harris County, Texas	72.2%
482013410001	Block Group 1, Census Tract 3410, Harris County, Texas	31.6%
482013410002	Block Group 2, Census Tract 3410, Harris County, Texas	19.6%
482013410003	Block Group 3, Census Tract 3410, Harris County, Texas	54.4%
482013410004	Block Group 4, Census Tract 3410, Harris County, Texas	43.6%
482013411001	Block Group 1, Census Tract 3411, Harris County, Texas	62.5%
482013411002	Block Group 2, Census Tract 3411, Harris County, Texas	42.7%
482013412011	Block Group 1, Census Tract 3412.01, Harris County, Texas	91.5%
482013412012	Block Group 2, Census Tract 3412.01, Harris County, Texas	24.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013412021	Block Group 1, Census Tract 3412.02, Harris County, Texas	27.7%
482013412022	Block Group 2, Census Tract 3412.02, Harris County, Texas	33.7%
482013412023	Block Group 3, Census Tract 3412.02, Harris County, Texas	16.8%
482013412024	Block Group 4, Census Tract 3412.02, Harris County, Texas	34.6%
482013413011	Block Group 1, Census Tract 3413.01, Harris County, Texas	42.8%
482013413012	Block Group 2, Census Tract 3413.01, Harris County, Texas	18.0%
482013413013	Block Group 3, Census Tract 3413.01, Harris County, Texas	74.3%
482013413021	Block Group 1, Census Tract 3413.02, Harris County, Texas	49.2%
482013413022	Block Group 2, Census Tract 3413.02, Harris County, Texas	45.9%
482013414001	Block Group 1, Census Tract 3414, Harris County, Texas	4.4%
482013414002	Block Group 2, Census Tract 3414, Harris County, Texas	14.4%
482013414003	Block Group 3, Census Tract 3414, Harris County, Texas	24.5%
482013415011	Block Group 1, Census Tract 3415.01, Harris County, Texas	9.6%
482013415012	Block Group 2, Census Tract 3415.01, Harris County, Texas	23.9%
482013415013	Block Group 3, Census Tract 3415.01, Harris County, Texas	53.6%
482013415021	Block Group 1, Census Tract 3415.02, Harris County, Texas	39.1%
482013415022	Block Group 2, Census Tract 3415.02, Harris County, Texas	53.8%
482013416001	Block Group 1, Census Tract 3416, Harris County, Texas	26.3%
482013416002	Block Group 2, Census Tract 3416, Harris County, Texas	14.5%
482013416003	Block Group 3, Census Tract 3416, Harris County, Texas	52.8%
482013417001	Block Group 1, Census Tract 3417, Harris County, Texas	10.3%
482013417002	Block Group 2, Census Tract 3417, Harris County, Texas	37.0%
482013417003	Block Group 3, Census Tract 3417, Harris County, Texas	42.1%
482013418001	Block Group 1, Census Tract 3418, Harris County, Texas	23.0%
482013418002	Block Group 2, Census Tract 3418, Harris County, Texas	41.1%
482013420011	Block Group 1, Census Tract 3420.01, Harris County, Texas	7.4%
482013420012	Block Group 2, Census Tract 3420.01, Harris County, Texas	5.9%
482013420013	Block Group 3, Census Tract 3420.01, Harris County, Texas	19.3%
482013420021	Block Group 1, Census Tract 3420.02, Harris County, Texas	17.6%
482013421001	Block Group 1, Census Tract 3421, Harris County, Texas	58.9%
482013421002	Block Group 2, Census Tract 3421, Harris County, Texas	13.2%
482013422001	Block Group 1, Census Tract 3422, Harris County, Texas	43.5%
482013422002	Block Group 2, Census Tract 3422, Harris County, Texas	50.9%
482013422003	Block Group 3, Census Tract 3422, Harris County, Texas	72.2%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013423001	Block Group 1, Census Tract 3423, Harris County, Texas	41.5%
482013423002	Block Group 2, Census Tract 3423, Harris County, Texas	4.3%
482013423003	Block Group 3, Census Tract 3423, Harris County, Texas	60.7%
482013424001	Block Group 1, Census Tract 3424, Harris County, Texas	46.9%
482013424002	Block Group 2, Census Tract 3424, Harris County, Texas	55.4%
482013425001	Block Group 1, Census Tract 3425, Harris County, Texas	32.5%
482013425002	Block Group 2, Census Tract 3425, Harris County, Texas	7.1%
482013425003	Block Group 3, Census Tract 3425, Harris County, Texas	54.1%
482013427001	Block Group 1, Census Tract 3427, Harris County, Texas	22.2%
482013427002	Block Group 2, Census Tract 3427, Harris County, Texas	36.2%
482013427003	Block Group 3, Census Tract 3427, Harris County, Texas	19.4%
482013428001	Block Group 1, Census Tract 3428, Harris County, Texas	7.3%
482013428002	Block Group 2, Census Tract 3428, Harris County, Texas	16.1%
482013429001	Block Group 1, Census Tract 3429, Harris County, Texas	42.9%
482013429002	Block Group 2, Census Tract 3429, Harris County, Texas	27.0%
482013429003	Block Group 3, Census Tract 3429, Harris County, Texas	23.2%
482013430001	Block Group 1, Census Tract 3430, Harris County, Texas	40.5%
482013430002	Block Group 2, Census Tract 3430, Harris County, Texas	32.6%
482013430003	Block Group 3, Census Tract 3430, Harris County, Texas	16.5%
482013431001	Block Group 1, Census Tract 3431, Harris County, Texas	30.0%
482013431002	Block Group 2, Census Tract 3431, Harris County, Texas	9.6%
482013431003	Block Group 3, Census Tract 3431, Harris County, Texas	29.5%
482013432001	Block Group 1, Census Tract 3432, Harris County, Texas	6.7%
482013432002	Block Group 2, Census Tract 3432, Harris County, Texas	19.6%
482013433011	Block Group 1, Census Tract 3433.01, Harris County, Texas	36.1%
482013433012	Block Group 2, Census Tract 3433.01, Harris County, Texas	38.3%
482013433013	Block Group 3, Census Tract 3433.01, Harris County, Texas	36.6%
482013433021	Block Group 1, Census Tract 3433.02, Harris County, Texas	22.5%
482013433022	Block Group 2, Census Tract 3433.02, Harris County, Texas	37.7%
482013436001	Block Group 1, Census Tract 3436, Harris County, Texas	22.3%
482013436002	Block Group 2, Census Tract 3436, Harris County, Texas	54.4%
482013436003	Block Group 3, Census Tract 3436, Harris County, Texas	44.0%
482013437001	Block Group 1, Census Tract 3437, Harris County, Texas	66.3%
482013437002	Block Group 2, Census Tract 3437, Harris County, Texas	39.0%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482013437003	Block Group 3, Census Tract 3437, Harris County, Texas	43.8%
482013501001	Block Group 1, Census Tract 3501, Harris County, Texas	18.2%
482013501002	Block Group 2, Census Tract 3501, Harris County, Texas	37.7%
482013502001	Block Group 1, Census Tract 3502, Harris County, Texas	63.1%
482013502002	Block Group 2, Census Tract 3502, Harris County, Texas	21.1%
482013502003	Block Group 3, Census Tract 3502, Harris County, Texas	23.1%
482013502004	Block Group 4, Census Tract 3502, Harris County, Texas	24.0%
482013503001	Block Group 1, Census Tract 3503, Harris County, Texas	34.8%
482013503002	Block Group 2, Census Tract 3503, Harris County, Texas	13.2%
482013503003	Block Group 3, Census Tract 3503, Harris County, Texas	22.8%
482013503004	Block Group 4, Census Tract 3503, Harris County, Texas	16.3%
482013504001	Block Group 1, Census Tract 3504, Harris County, Texas	29.1%
482013504002	Block Group 2, Census Tract 3504, Harris County, Texas	21.2%
482013504003	Block Group 3, Census Tract 3504, Harris County, Texas	62.8%
482013505001	Block Group 1, Census Tract 3505, Harris County, Texas	50.6%
482013505002	Block Group 2, Census Tract 3505, Harris County, Texas	77.5%
482013505003	Block Group 3, Census Tract 3505, Harris County, Texas	51.2%
482013505004	Block Group 4, Census Tract 3505, Harris County, Texas	36.1%
482013506011	Block Group 1, Census Tract 3506.01, Harris County, Texas	9.5%
482013506012	Block Group 2, Census Tract 3506.01, Harris County, Texas	5.4%
482013506021	Block Group 1, Census Tract 3506.02, Harris County, Texas	19.9%
482013506022	Block Group 2, Census Tract 3506.02, Harris County, Texas	26.2%
482013506023	Block Group 3, Census Tract 3506.02, Harris County, Texas	18.5%
482013507001	Block Group 1, Census Tract 3507, Harris County, Texas	15.6%
482013507002	Block Group 2, Census Tract 3507, Harris County, Texas	22.8%
482013508011	Block Group 1, Census Tract 3508.01, Harris County, Texas	45.4%
482013508012	Block Group 2, Census Tract 3508.01, Harris County, Texas	37.4%
482013508013	Block Group 3, Census Tract 3508.01, Harris County, Texas	15.9%
482013508021	Block Group 1, Census Tract 3508.02, Harris County, Texas	7.7%
482013508022	Block Group 2, Census Tract 3508.02, Harris County, Texas	46.3%
482014101001	Block Group 1, Census Tract 4101, Harris County, Texas	53.5%
482014101002	Block Group 2, Census Tract 4101, Harris County, Texas	39.3%
482014102001	Block Group 1, Census Tract 4102, Harris County, Texas	35.4%
482014102002	Block Group 2, Census Tract 4102, Harris County, Texas	26.3%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014102003	Block Group 3, Census Tract 4102, Harris County, Texas	31.8%
482014103001	Block Group 1, Census Tract 4103, Harris County, Texas	33.3%
482014103002	Block Group 2, Census Tract 4103, Harris County, Texas	14.7%
482014103003	Block Group 3, Census Tract 4103, Harris County, Texas	35.0%
482014104011	Block Group 1, Census Tract 4104.01, Harris County, Texas	23.0%
482014104012	Block Group 2, Census Tract 4104.01, Harris County, Texas	32.9%
482014104013	Block Group 3, Census Tract 4104.01, Harris County, Texas	20.0%
482014104021	Block Group 1, Census Tract 4104.02, Harris County, Texas	52.0%
482014104022	Block Group 2, Census Tract 4104.02, Harris County, Texas	36.2%
482014105001	Block Group 1, Census Tract 4105, Harris County, Texas	37.5%
482014105002	Block Group 2, Census Tract 4105, Harris County, Texas	32.8%
482014105003	Block Group 3, Census Tract 4105, Harris County, Texas	37.3%
482014105004	Block Group 4, Census Tract 4105, Harris County, Texas	16.0%
482014106001	Block Group 1, Census Tract 4106, Harris County, Texas	17.5%
482014106002	Block Group 2, Census Tract 4106, Harris County, Texas	20.2%
482014107011	Block Group 1, Census Tract 4107.01, Harris County, Texas	26.0%
482014107012	Block Group 2, Census Tract 4107.01, Harris County, Texas	38.6%
482014107013	Block Group 3, Census Tract 4107.01, Harris County, Texas	48.2%
482014107014	Block Group 4, Census Tract 4107.01, Harris County, Texas	53.0%
482014107021	Block Group 1, Census Tract 4107.02, Harris County, Texas	34.9%
482014107022	Block Group 2, Census Tract 4107.02, Harris County, Texas	65.7%
482014108001	Block Group 1, Census Tract 4108, Harris County, Texas	39.4%
482014108002	Block Group 2, Census Tract 4108, Harris County, Texas	63.1%
482014108003	Block Group 3, Census Tract 4108, Harris County, Texas	59.8%
482014109001	Block Group 1, Census Tract 4109, Harris County, Texas	44.5%
482014109002	Block Group 2, Census Tract 4109, Harris County, Texas	48.6%
482014109003	Block Group 3, Census Tract 4109, Harris County, Texas	15.1%
482014110001	Block Group 1, Census Tract 4110, Harris County, Texas	26.0%
482014110002	Block Group 2, Census Tract 4110, Harris County, Texas	29.5%
482014110003	Block Group 3, Census Tract 4110, Harris County, Texas	13.2%
482014111001	Block Group 1, Census Tract 4111, Harris County, Texas	10.1%
482014111002	Block Group 2, Census Tract 4111, Harris County, Texas	15.1%
482014111003	Block Group 3, Census Tract 4111, Harris County, Texas	25.6%
482014112001	Block Group 1, Census Tract 4112, Harris County, Texas	2.9%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014112002	Block Group 2, Census Tract 4112, Harris County, Texas	3.8%
482014113001	Block Group 1, Census Tract 4113, Harris County, Texas	6.1%
482014113002	Block Group 2, Census Tract 4113, Harris County, Texas	28.8%
482014113003	Block Group 3, Census Tract 4113, Harris County, Texas	39.3%
482014114001	Block Group 1, Census Tract 4114, Harris County, Texas	20.0%
482014114002	Block Group 2, Census Tract 4114, Harris County, Texas	8.1%
482014114003	Block Group 3, Census Tract 4114, Harris County, Texas	1.6%
482014115011	Block Group 1, Census Tract 4115.01, Harris County, Texas	31.0%
482014115012	Block Group 2, Census Tract 4115.01, Harris County, Texas	14.1%
482014115013	Block Group 3, Census Tract 4115.01, Harris County, Texas	26.4%
482014115021	Block Group 1, Census Tract 4115.02, Harris County, Texas	11.5%
482014115022	Block Group 2, Census Tract 4115.02, Harris County, Texas	9.5%
482014115023	Block Group 3, Census Tract 4115.02, Harris County, Texas	31.1%
482014115024	Block Group 4, Census Tract 4115.02, Harris County, Texas	22.9%
482014116001	Block Group 1, Census Tract 4116, Harris County, Texas	7.1%
482014116002	Block Group 2, Census Tract 4116, Harris County, Texas	20.7%
482014117001	Block Group 1, Census Tract 4117, Harris County, Texas	64.5%
482014117002	Block Group 2, Census Tract 4117, Harris County, Texas	20.4%
482014118001	Block Group 1, Census Tract 4118, Harris County, Texas	58.6%
482014118002	Block Group 2, Census Tract 4118, Harris County, Texas	15.4%
482014118003	Block Group 3, Census Tract 4118, Harris County, Texas	23.6%
482014118004	Block Group 4, Census Tract 4118, Harris County, Texas	11.1%
482014119001	Block Group 1, Census Tract 4119, Harris County, Texas	31.9%
482014119002	Block Group 2, Census Tract 4119, Harris County, Texas	17.9%
482014119003	Block Group 3, Census Tract 4119, Harris County, Texas	31.0%
482014120001	Block Group 1, Census Tract 4120, Harris County, Texas	22.5%
482014120002	Block Group 2, Census Tract 4120, Harris County, Texas	9.3%
482014120003	Block Group 3, Census Tract 4120, Harris County, Texas	6.5%
482014121001	Block Group 1, Census Tract 4121, Harris County, Texas	100.0%
482014122001	Block Group 1, Census Tract 4122, Harris County, Texas	8.0%
482014122002	Block Group 2, Census Tract 4122, Harris County, Texas	7.8%
482014122003	Block Group 3, Census Tract 4122, Harris County, Texas	23.6%
482014122004	Block Group 4, Census Tract 4122, Harris County, Texas	11.4%
482014123001	Block Group 1, Census Tract 4123, Harris County, Texas	4.9%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014123002	Block Group 2, Census Tract 4123, Harris County, Texas	7.2%
482014123003	Block Group 3, Census Tract 4123, Harris County, Texas	10.3%
482014123004	Block Group 4, Census Tract 4123, Harris County, Texas	7.7%
482014123005	Block Group 5, Census Tract 4123, Harris County, Texas	13.0%
482014124001	Block Group 1, Census Tract 4124, Harris County, Texas	0.0%
482014124002	Block Group 2, Census Tract 4124, Harris County, Texas	9.4%
482014124003	Block Group 3, Census Tract 4124, Harris County, Texas	3.8%
482014124004	Block Group 4, Census Tract 4124, Harris County, Texas	8.4%
482014125001	Block Group 1, Census Tract 4125, Harris County, Texas	8.2%
482014125002	Block Group 2, Census Tract 4125, Harris County, Texas	30.4%
482014126001	Block Group 1, Census Tract 4126, Harris County, Texas	6.5%
482014126002	Block Group 2, Census Tract 4126, Harris County, Texas	23.1%
482014126003	Block Group 3, Census Tract 4126, Harris County, Texas	3.4%
482014127001	Block Group 1, Census Tract 4127, Harris County, Texas	14.8%
482014127002	Block Group 2, Census Tract 4127, Harris County, Texas	14.2%
482014128001	Block Group 1, Census Tract 4128, Harris County, Texas	5.2%
482014128002	Block Group 2, Census Tract 4128, Harris County, Texas	15.8%
482014128003	Block Group 3, Census Tract 4128, Harris County, Texas	7.6%
482014129001	Block Group 1, Census Tract 4129, Harris County, Texas	37.7%
482014129002	Block Group 2, Census Tract 4129, Harris County, Texas	48.6%
482014129003	Block Group 3, Census Tract 4129, Harris County, Texas	18.1%
482014130001	Block Group 1, Census Tract 4130, Harris County, Texas	15.1%
482014130002	Block Group 2, Census Tract 4130, Harris County, Texas	27.7%
482014131001	Block Group 1, Census Tract 4131, Harris County, Texas	15.7%
482014131002	Block Group 2, Census Tract 4131, Harris County, Texas	24.7%
482014131003	Block Group 3, Census Tract 4131, Harris County, Texas	7.8%
482014132011	Block Group 1, Census Tract 4132.01, Harris County, Texas	38.4%
482014132012	Block Group 2, Census Tract 4132.01, Harris County, Texas	15.0%
482014132021	Block Group 1, Census Tract 4132.02, Harris County, Texas	30.6%
482014132022	Block Group 2, Census Tract 4132.02, Harris County, Texas	18.7%
482014133001	Block Group 1, Census Tract 4133, Harris County, Texas	75.0%
482014133002	Block Group 2, Census Tract 4133, Harris County, Texas	20.9%
482014133003	Block Group 3, Census Tract 4133, Harris County, Texas	16.4%
482014133004	Block Group 4, Census Tract 4133, Harris County, Texas	41.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014133005	Block Group 5, Census Tract 4133, Harris County, Texas	6.1%
482014201001	Block Group 1, Census Tract 4201, Harris County, Texas	62.9%
482014201002	Block Group 2, Census Tract 4201, Harris County, Texas	75.5%
482014202001	Block Group 1, Census Tract 4202, Harris County, Texas	44.2%
482014202002	Block Group 2, Census Tract 4202, Harris County, Texas	39.7%
482014203001	Block Group 1, Census Tract 4203, Harris County, Texas	21.8%
482014203002	Block Group 2, Census Tract 4203, Harris County, Texas	19.9%
482014203003	Block Group 3, Census Tract 4203, Harris County, Texas	14.2%
482014204001	Block Group 1, Census Tract 4204, Harris County, Texas	22.7%
482014204002	Block Group 2, Census Tract 4204, Harris County, Texas	20.1%
482014204003	Block Group 3, Census Tract 4204, Harris County, Texas	52.9%
482014205001	Block Group 1, Census Tract 4205, Harris County, Texas	58.5%
482014205002	Block Group 2, Census Tract 4205, Harris County, Texas	82.5%
482014205003	Block Group 3, Census Tract 4205, Harris County, Texas	89.3%
482014206001	Block Group 1, Census Tract 4206, Harris County, Texas	45.2%
482014206002	Block Group 2, Census Tract 4206, Harris County, Texas	19.8%
482014207001	Block Group 1, Census Tract 4207, Harris County, Texas	4.3%
482014207002	Block Group 2, Census Tract 4207, Harris County, Texas	2.2%
482014207003	Block Group 3, Census Tract 4207, Harris County, Texas	8.7%
482014208001	Block Group 1, Census Tract 4208, Harris County, Texas	12.7%
482014208002	Block Group 2, Census Tract 4208, Harris County, Texas	11.3%
482014208003	Block Group 3, Census Tract 4208, Harris County, Texas	17.4%
482014209001	Block Group 1, Census Tract 4209, Harris County, Texas	15.4%
482014209002	Block Group 2, Census Tract 4209, Harris County, Texas	1.1%
482014209003	Block Group 3, Census Tract 4209, Harris County, Texas	9.1%
482014209004	Block Group 4, Census Tract 4209, Harris County, Texas	9.0%
482014210001	Block Group 1, Census Tract 4210, Harris County, Texas	5.6%
482014210002	Block Group 2, Census Tract 4210, Harris County, Texas	10.3%
482014211011	Block Group 1, Census Tract 4211.01, Harris County, Texas	27.3%
482014211012	Block Group 2, Census Tract 4211.01, Harris County, Texas	81.8%
482014211021	Block Group 1, Census Tract 4211.02, Harris County, Texas	87.1%
482014211022	Block Group 2, Census Tract 4211.02, Harris County, Texas	46.3%
482014211023	Block Group 3, Census Tract 4211.02, Harris County, Texas	77.2%
482014212011	Block Group 1, Census Tract 4212.01, Harris County, Texas	71.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014212012	Block Group 2, Census Tract 4212.01, Harris County, Texas	63.2%
482014212013	Block Group 3, Census Tract 4212.01, Harris County, Texas	100.0%
482014212021	Block Group 1, Census Tract 4212.02, Harris County, Texas	94.9%
482014212022	Block Group 2, Census Tract 4212.02, Harris County, Texas	100.0%
482014212023	Block Group 3, Census Tract 4212.02, Harris County, Texas	50.0%
482014213001	Block Group 1, Census Tract 4213, Harris County, Texas	76.3%
482014213002	Block Group 2, Census Tract 4213, Harris County, Texas	80.0%
482014213003	Block Group 3, Census Tract 4213, Harris County, Texas	87.9%
482014214011	Block Group 1, Census Tract 4214.01, Harris County, Texas	94.2%
482014214012	Block Group 2, Census Tract 4214.01, Harris County, Texas	81.5%
482014214021	Block Group 1, Census Tract 4214.02, Harris County, Texas	95.1%
482014214022	Block Group 2, Census Tract 4214.02, Harris County, Texas	87.6%
482014214031	Block Group 1, Census Tract 4214.03, Harris County, Texas	54.6%
482014214032	Block Group 2, Census Tract 4214.03, Harris County, Texas	88.6%
482014214033	Block Group 3, Census Tract 4214.03, Harris County, Texas	69.8%
482014215001	Block Group 1, Census Tract 4215, Harris County, Texas	91.2%
482014215002	Block Group 2, Census Tract 4215, Harris County, Texas	74.3%
482014215003	Block Group 3, Census Tract 4215, Harris County, Texas	57.3%
482014215004	Block Group 4, Census Tract 4215, Harris County, Texas	71.8%
482014216001	Block Group 1, Census Tract 4216, Harris County, Texas	78.8%
482014216002	Block Group 2, Census Tract 4216, Harris County, Texas	74.9%
482014216003	Block Group 3, Census Tract 4216, Harris County, Texas	55.8%
482014216004	Block Group 4, Census Tract 4216, Harris County, Texas	100.0%
482014217001	Block Group 1, Census Tract 4217, Harris County, Texas	67.5%
482014217002	Block Group 2, Census Tract 4217, Harris County, Texas	55.0%
482014217003	Block Group 3, Census Tract 4217, Harris County, Texas	10.7%
482014217004	Block Group 4, Census Tract 4217, Harris County, Texas	24.2%
482014218001	Block Group 1, Census Tract 4218, Harris County, Texas	52.1%
482014218002	Block Group 2, Census Tract 4218, Harris County, Texas	71.9%
482014218003	Block Group 3, Census Tract 4218, Harris County, Texas	53.3%
482014218004	Block Group 4, Census Tract 4218, Harris County, Texas	18.1%
482014219001	Block Group 1, Census Tract 4219, Harris County, Texas	15.3%
482014219002	Block Group 2, Census Tract 4219, Harris County, Texas	11.3%
482014219003	Block Group 3, Census Tract 4219, Harris County, Texas	1.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014220001	Block Group 1, Census Tract 4220, Harris County, Texas	2.9%
482014220002	Block Group 2, Census Tract 4220, Harris County, Texas	8.4%
482014220003	Block Group 3, Census Tract 4220, Harris County, Texas	23.2%
482014221001	Block Group 1, Census Tract 4221, Harris County, Texas	55.6%
482014221002	Block Group 2, Census Tract 4221, Harris County, Texas	13.5%
482014221003	Block Group 3, Census Tract 4221, Harris County, Texas	37.2%
482014221004	Block Group 4, Census Tract 4221, Harris County, Texas	38.3%
482014221005	Block Group 5, Census Tract 4221, Harris County, Texas	19.7%
482014222001	Block Group 1, Census Tract 4222, Harris County, Texas	85.1%
482014222002	Block Group 2, Census Tract 4222, Harris County, Texas	81.0%
482014222003	Block Group 3, Census Tract 4222, Harris County, Texas	74.5%
482014223011	Block Group 1, Census Tract 4223.01, Harris County, Texas	79.5%
482014223012	Block Group 2, Census Tract 4223.01, Harris County, Texas	48.1%
482014223013	Block Group 3, Census Tract 4223.01, Harris County, Texas	44.9%
482014223014	Block Group 4, Census Tract 4223.01, Harris County, Texas	89.2%
482014223021	Block Group 1, Census Tract 4223.02, Harris County, Texas	32.5%
482014224011	Block Group 1, Census Tract 4224.01, Harris County, Texas	64.3%
482014224012	Block Group 2, Census Tract 4224.01, Harris County, Texas	85.2%
482014224013	Block Group 3, Census Tract 4224.01, Harris County, Texas	92.6%
482014224021	Block Group 1, Census Tract 4224.02, Harris County, Texas	69.5%
482014224022	Block Group 2, Census Tract 4224.02, Harris County, Texas	63.9%
482014224023	Block Group 3, Census Tract 4224.02, Harris County, Texas	75.1%
482014224024	Block Group 4, Census Tract 4224.02, Harris County, Texas	5.7%
482014225001	Block Group 1, Census Tract 4225, Harris County, Texas	82.7%
482014225002	Block Group 2, Census Tract 4225, Harris County, Texas	6.1%
482014225003	Block Group 3, Census Tract 4225, Harris County, Texas	77.5%
482014225004	Block Group 4, Census Tract 4225, Harris County, Texas	29.7%
482014226001	Block Group 1, Census Tract 4226, Harris County, Texas	67.2%
482014226002	Block Group 2, Census Tract 4226, Harris County, Texas	29.1%
482014226003	Block Group 3, Census Tract 4226, Harris County, Texas	53.0%
482014226004	Block Group 4, Census Tract 4226, Harris County, Texas	87.0%
482014227011	Block Group 1, Census Tract 4227.01, Harris County, Texas	92.1%
482014227012	Block Group 2, Census Tract 4227.01, Harris County, Texas	57.7%
482014227013	Block Group 3, Census Tract 4227.01, Harris County, Texas	42.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014227021	Block Group 1, Census Tract 4227.02, Harris County, Texas	67.1%
482014227022	Block Group 2, Census Tract 4227.02, Harris County, Texas	37.7%
482014228001	Block Group 1, Census Tract 4228, Harris County, Texas	27.8%
482014228002	Block Group 2, Census Tract 4228, Harris County, Texas	73.3%
482014228003	Block Group 3, Census Tract 4228, Harris County, Texas	33.9%
482014228004	Block Group 4, Census Tract 4228, Harris County, Texas	93.1%
482014229001	Block Group 1, Census Tract 4229, Harris County, Texas	82.3%
482014229002	Block Group 2, Census Tract 4229, Harris County, Texas	53.9%
482014230001	Block Group 1, Census Tract 4230, Harris County, Texas	78.0%
482014230002	Block Group 2, Census Tract 4230, Harris County, Texas	60.4%
482014230003	Block Group 3, Census Tract 4230, Harris County, Texas	66.4%
482014231001	Block Group 1, Census Tract 4231, Harris County, Texas	86.7%
482014231002	Block Group 2, Census Tract 4231, Harris County, Texas	82.6%
482014232011	Block Group 1, Census Tract 4232.01, Harris County, Texas	6.3%
482014232012	Block Group 2, Census Tract 4232.01, Harris County, Texas	62.5%
482014232021	Block Group 1, Census Tract 4232.02, Harris County, Texas	87.5%
482014232022	Block Group 2, Census Tract 4232.02, Harris County, Texas	46.9%
482014232023	Block Group 3, Census Tract 4232.02, Harris County, Texas	72.9%
482014233011	Block Group 1, Census Tract 4233.01, Harris County, Texas	33.5%
482014233012	Block Group 2, Census Tract 4233.01, Harris County, Texas	33.8%
482014233013	Block Group 3, Census Tract 4233.01, Harris County, Texas	86.1%
482014233021	Block Group 1, Census Tract 4233.02, Harris County, Texas	36.9%
482014233022	Block Group 2, Census Tract 4233.02, Harris County, Texas	65.2%
482014233023	Block Group 3, Census Tract 4233.02, Harris County, Texas	61.5%
482014234011	Block Group 1, Census Tract 4234.01, Harris County, Texas	31.8%
482014234012	Block Group 2, Census Tract 4234.01, Harris County, Texas	64.1%
482014234013	Block Group 3, Census Tract 4234.01, Harris County, Texas	19.1%
482014234021	Block Group 1, Census Tract 4234.02, Harris County, Texas	28.2%
482014234022	Block Group 2, Census Tract 4234.02, Harris County, Texas	33.0%
482014235001	Block Group 1, Census Tract 4235, Harris County, Texas	26.5%
482014236001	Block Group 1, Census Tract 4236, Harris County, Texas	56.9%
482014236002	Block Group 2, Census Tract 4236, Harris County, Texas	55.5%
482014236003	Block Group 3, Census Tract 4236, Harris County, Texas	37.7%
482014236004	Block Group 4, Census Tract 4236, Harris County, Texas	44.0%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014301001	Block Group 1, Census Tract 4301, Harris County, Texas	34.9%
482014301002	Block Group 2, Census Tract 4301, Harris County, Texas	15.7%
482014301003	Block Group 3, Census Tract 4301, Harris County, Texas	44.7%
482014301004	Block Group 4, Census Tract 4301, Harris County, Texas	25.6%
482014301005	Block Group 5, Census Tract 4301, Harris County, Texas	41.1%
482014302001	Block Group 1, Census Tract 4302, Harris County, Texas	15.3%
482014303001	Block Group 1, Census Tract 4303, Harris County, Texas	3.1%
482014303002	Block Group 2, Census Tract 4303, Harris County, Texas	1.1%
482014303003	Block Group 3, Census Tract 4303, Harris County, Texas	1.9%
482014304001	Block Group 1, Census Tract 4304, Harris County, Texas	4.6%
482014304002	Block Group 2, Census Tract 4304, Harris County, Texas	6.4%
482014305001	Block Group 1, Census Tract 4305, Harris County, Texas	17.2%
482014305002	Block Group 2, Census Tract 4305, Harris County, Texas	19.0%
482014306001	Block Group 1, Census Tract 4306, Harris County, Texas	10.5%
482014306002	Block Group 2, Census Tract 4306, Harris County, Texas	9.0%
482014307001	Block Group 1, Census Tract 4307, Harris County, Texas	34.0%
482014307002	Block Group 2, Census Tract 4307, Harris County, Texas	47.6%
482014307003	Block Group 3, Census Tract 4307, Harris County, Texas	4.1%
482014308001	Block Group 1, Census Tract 4308, Harris County, Texas	7.2%
482014308002	Block Group 2, Census Tract 4308, Harris County, Texas	11.0%
482014309001	Block Group 1, Census Tract 4309, Harris County, Texas	11.1%
482014309002	Block Group 2, Census Tract 4309, Harris County, Texas	7.2%
482014309003	Block Group 3, Census Tract 4309, Harris County, Texas	15.7%
482014309004	Block Group 4, Census Tract 4309, Harris County, Texas	29.2%
482014310001	Block Group 1, Census Tract 4310, Harris County, Texas	19.5%
482014310002	Block Group 2, Census Tract 4310, Harris County, Texas	3.6%
482014310003	Block Group 3, Census Tract 4310, Harris County, Texas	22.6%
482014310004	Block Group 4, Census Tract 4310, Harris County, Texas	3.7%
482014311011	Block Group 1, Census Tract 4311.01, Harris County, Texas	8.0%
482014311012	Block Group 2, Census Tract 4311.01, Harris County, Texas	55.3%
482014311013	Block Group 3, Census Tract 4311.01, Harris County, Texas	12.4%
482014311021	Block Group 1, Census Tract 4311.02, Harris County, Texas	33.2%
482014311022	Block Group 2, Census Tract 4311.02, Harris County, Texas	20.6%
482014312011	Block Group 1, Census Tract 4312.01, Harris County, Texas	17.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014312012	Block Group 2, Census Tract 4312.01, Harris County, Texas	58.6%
482014312021	Block Group 1, Census Tract 4312.02, Harris County, Texas	39.0%
482014312022	Block Group 2, Census Tract 4312.02, Harris County, Texas	3.5%
482014312023	Block Group 3, Census Tract 4312.02, Harris County, Texas	19.9%
482014312024	Block Group 4, Census Tract 4312.02, Harris County, Texas	30.4%
482014313011	Block Group 1, Census Tract 4313.01, Harris County, Texas	47.7%
482014313012	Block Group 2, Census Tract 4313.01, Harris County, Texas	61.7%
482014313013	Block Group 3, Census Tract 4313.01, Harris County, Texas	52.9%
482014313021	Block Group 1, Census Tract 4313.02, Harris County, Texas	27.8%
482014313022	Block Group 2, Census Tract 4313.02, Harris County, Texas	7.1%
482014313023	Block Group 3, Census Tract 4313.02, Harris County, Texas	10.0%
482014314011	Block Group 1, Census Tract 4314.01, Harris County, Texas	32.0%
482014314012	Block Group 2, Census Tract 4314.01, Harris County, Texas	30.7%
482014314021	Block Group 1, Census Tract 4314.02, Harris County, Texas	32.5%
482014314022	Block Group 2, Census Tract 4314.02, Harris County, Texas	11.4%
482014315011	Block Group 1, Census Tract 4315.01, Harris County, Texas	19.8%
482014315012	Block Group 2, Census Tract 4315.01, Harris County, Texas	21.6%
482014315013	Block Group 3, Census Tract 4315.01, Harris County, Texas	17.4%
482014315021	Block Group 1, Census Tract 4315.02, Harris County, Texas	19.2%
482014315022	Block Group 2, Census Tract 4315.02, Harris County, Texas	7.2%
482014315023	Block Group 3, Census Tract 4315.02, Harris County, Texas	6.8%
482014316001	Block Group 1, Census Tract 4316, Harris County, Texas	6.1%
482014316002	Block Group 2, Census Tract 4316, Harris County, Texas	4.2%
482014316003	Block Group 3, Census Tract 4316, Harris County, Texas	12.4%
482014317001	Block Group 1, Census Tract 4317, Harris County, Texas	10.4%
482014317002	Block Group 2, Census Tract 4317, Harris County, Texas	13.0%
482014317003	Block Group 3, Census Tract 4317, Harris County, Texas	6.7%
482014318011	Block Group 1, Census Tract 4318.01, Harris County, Texas	17.6%
482014318012	Block Group 2, Census Tract 4318.01, Harris County, Texas	21.5%
482014318013	Block Group 3, Census Tract 4318.01, Harris County, Texas	12.2%
482014318021	Block Group 1, Census Tract 4318.02, Harris County, Texas	21.1%
482014318022	Block Group 2, Census Tract 4318.02, Harris County, Texas	21.8%
482014319001	Block Group 1, Census Tract 4319, Harris County, Texas	19.1%
482014319002	Block Group 2, Census Tract 4319, Harris County, Texas	12.3%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014320011	Block Group 1, Census Tract 4320.01, Harris County, Texas	50.4%
482014320012	Block Group 2, Census Tract 4320.01, Harris County, Texas	13.9%
482014320021	Block Group 1, Census Tract 4320.02, Harris County, Texas	94.0%
482014320022	Block Group 2, Census Tract 4320.02, Harris County, Texas	73.7%
482014320023	Block Group 3, Census Tract 4320.02, Harris County, Texas	68.6%
482014321001	Block Group 1, Census Tract 4321, Harris County, Texas	57.3%
482014321002	Block Group 2, Census Tract 4321, Harris County, Texas	57.4%
482014321003	Block Group 3, Census Tract 4321, Harris County, Texas	9.9%
482014322001	Block Group 1, Census Tract 4322, Harris County, Texas	28.0%
482014322002	Block Group 2, Census Tract 4322, Harris County, Texas	27.9%
482014322003	Block Group 3, Census Tract 4322, Harris County, Texas	71.0%
482014323001	Block Group 1, Census Tract 4323, Harris County, Texas	48.9%
482014323002	Block Group 2, Census Tract 4323, Harris County, Texas	88.0%
482014323003	Block Group 3, Census Tract 4323, Harris County, Texas	63.1%
482014323004	Block Group 4, Census Tract 4323, Harris County, Texas	35.9%
482014324001	Block Group 1, Census Tract 4324, Harris County, Texas	44.9%
482014324002	Block Group 2, Census Tract 4324, Harris County, Texas	57.1%
482014324003	Block Group 3, Census Tract 4324, Harris County, Texas	68.1%
482014325001	Block Group 1, Census Tract 4325, Harris County, Texas	70.2%
482014325002	Block Group 2, Census Tract 4325, Harris County, Texas	48.2%
482014325003	Block Group 3, Census Tract 4325, Harris County, Texas	57.2%
482014326001	Block Group 1, Census Tract 4326, Harris County, Texas	4.4%
482014326002	Block Group 2, Census Tract 4326, Harris County, Texas	34.4%
482014327011	Block Group 1, Census Tract 4327.01, Harris County, Texas	93.2%
482014327012	Block Group 2, Census Tract 4327.01, Harris County, Texas	82.6%
482014327013	Block Group 3, Census Tract 4327.01, Harris County, Texas	53.4%
482014327021	Block Group 1, Census Tract 4327.02, Harris County, Texas	50.8%
482014327022	Block Group 2, Census Tract 4327.02, Harris County, Texas	65.6%
482014328011	Block Group 1, Census Tract 4328.01, Harris County, Texas	66.7%
482014328012	Block Group 2, Census Tract 4328.01, Harris County, Texas	89.5%
482014328013	Block Group 3, Census Tract 4328.01, Harris County, Texas	79.1%
482014328021	Block Group 1, Census Tract 4328.02, Harris County, Texas	83.7%
482014328022	Block Group 2, Census Tract 4328.02, Harris County, Texas	76.3%
482014328023	Block Group 3, Census Tract 4328.02, Harris County, Texas	81.9%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014328024	Block Group 4, Census Tract 4328.02, Harris County, Texas	15.4%
482014329011	Block Group 1, Census Tract 4329.01, Harris County, Texas	70.9%
482014329012	Block Group 2, Census Tract 4329.01, Harris County, Texas	70.7%
482014329021	Block Group 1, Census Tract 4329.02, Harris County, Texas	77.1%
482014329022	Block Group 2, Census Tract 4329.02, Harris County, Texas	83.5%
482014329023	Block Group 3, Census Tract 4329.02, Harris County, Texas	48.5%
482014330011	Block Group 1, Census Tract 4330.01, Harris County, Texas	97.4%
482014330012	Block Group 2, Census Tract 4330.01, Harris County, Texas	83.5%
482014330013	Block Group 3, Census Tract 4330.01, Harris County, Texas	83.5%
482014330021	Block Group 1, Census Tract 4330.02, Harris County, Texas	96.4%
482014330022	Block Group 2, Census Tract 4330.02, Harris County, Texas	88.7%
482014330031	Block Group 1, Census Tract 4330.03, Harris County, Texas	78.2%
482014330032	Block Group 2, Census Tract 4330.03, Harris County, Texas	89.7%
482014331001	Block Group 1, Census Tract 4331, Harris County, Texas	76.7%
482014331002	Block Group 2, Census Tract 4331, Harris County, Texas	92.3%
482014332011	Block Group 1, Census Tract 4332.01, Harris County, Texas	62.6%
482014332012	Block Group 2, Census Tract 4332.01, Harris County, Texas	66.9%
482014332013	Block Group 3, Census Tract 4332.01, Harris County, Texas	38.2%
482014332021	Block Group 1, Census Tract 4332.02, Harris County, Texas	54.9%
482014332022	Block Group 2, Census Tract 4332.02, Harris County, Texas	69.4%
482014333001	Block Group 1, Census Tract 4333, Harris County, Texas	52.5%
482014333002	Block Group 2, Census Tract 4333, Harris County, Texas	34.4%
482014333003	Block Group 3, Census Tract 4333, Harris County, Texas	40.9%
482014334001	Block Group 1, Census Tract 4334, Harris County, Texas	77.2%
482014334002	Block Group 2, Census Tract 4334, Harris County, Texas	65.9%
482014335011	Block Group 1, Census Tract 4335.01, Harris County, Texas	99.6%
482014335012	Block Group 2, Census Tract 4335.01, Harris County, Texas	97.5%
482014335013	Block Group 3, Census Tract 4335.01, Harris County, Texas	76.6%
482014335021	Block Group 1, Census Tract 4335.02, Harris County, Texas	89.2%
482014335022	Block Group 2, Census Tract 4335.02, Harris County, Texas	100.0%
482014335023	Block Group 3, Census Tract 4335.02, Harris County, Texas	83.8%
482014335024	Block Group 4, Census Tract 4335.02, Harris County, Texas	95.1%
482014336001	Block Group 1, Census Tract 4336, Harris County, Texas	90.2%
482014336002	Block Group 2, Census Tract 4336, Harris County, Texas	84.1%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014336003	Block Group 3, Census Tract 4336, Harris County, Texas	81.7%
482014336004	Block Group 4, Census Tract 4336, Harris County, Texas	99.1%
482014401001	Block Group 1, Census Tract 4401, Harris County, Texas	95.6%
482014401002	Block Group 2, Census Tract 4401, Harris County, Texas	13.9%
482014401003	Block Group 3, Census Tract 4401, Harris County, Texas	25.3%
482014401004	Block Group 4, Census Tract 4401, Harris County, Texas	100.0%
482014501001	Block Group 1, Census Tract 4501, Harris County, Texas	22.5%
482014502001	Block Group 1, Census Tract 4502, Harris County, Texas	3.1%
482014502002	Block Group 2, Census Tract 4502, Harris County, Texas	7.7%
482014502003	Block Group 3, Census Tract 4502, Harris County, Texas	12.4%
482014503001	Block Group 1, Census Tract 4503, Harris County, Texas	44.9%
482014503002	Block Group 2, Census Tract 4503, Harris County, Texas	9.3%
482014503003	Block Group 3, Census Tract 4503, Harris County, Texas	5.8%
482014503004	Block Group 4, Census Tract 4503, Harris County, Texas	53.0%
482014504001	Block Group 1, Census Tract 4504, Harris County, Texas	15.8%
482014504002	Block Group 2, Census Tract 4504, Harris County, Texas	42.1%
482014504003	Block Group 3, Census Tract 4504, Harris County, Texas	25.6%
482014505001	Block Group 1, Census Tract 4505, Harris County, Texas	9.6%
482014505002	Block Group 2, Census Tract 4505, Harris County, Texas	17.4%
482014506001	Block Group 1, Census Tract 4506, Harris County, Texas	2.4%
482014506002	Block Group 2, Census Tract 4506, Harris County, Texas	45.8%
482014506003	Block Group 3, Census Tract 4506, Harris County, Texas	26.4%
482014507001	Block Group 1, Census Tract 4507, Harris County, Texas	3.7%
482014507002	Block Group 2, Census Tract 4507, Harris County, Texas	8.6%
482014507003	Block Group 3, Census Tract 4507, Harris County, Texas	8.0%
482014508011	Block Group 1, Census Tract 4508.01, Harris County, Texas	7.8%
482014508012	Block Group 2, Census Tract 4508.01, Harris County, Texas	30.1%
482014508021	Block Group 1, Census Tract 4508.02, Harris County, Texas	4.8%
482014508022	Block Group 2, Census Tract 4508.02, Harris County, Texas	83.6%
482014508023	Block Group 3, Census Tract 4508.02, Harris County, Texas	43.2%
482014508024	Block Group 4, Census Tract 4508.02, Harris County, Texas	61.0%
482014508025	Block Group 5, Census Tract 4508.02, Harris County, Texas	45.0%
482014509001	Block Group 1, Census Tract 4509, Harris County, Texas	20.9%
482014509002	Block Group 2, Census Tract 4509, Harris County, Texas	31.1%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014510011	Block Group 1, Census Tract 4510.01, Harris County, Texas	15.7%
482014510012	Block Group 2, Census Tract 4510.01, Harris County, Texas	82.1%
482014510013	Block Group 3, Census Tract 4510.01, Harris County, Texas	82.8%
482014510021	Block Group 1, Census Tract 4510.02, Harris County, Texas	66.7%
482014510022	Block Group 2, Census Tract 4510.02, Harris County, Texas	44.4%
482014510023	Block Group 3, Census Tract 4510.02, Harris County, Texas	81.4%
482014510024	Block Group 4, Census Tract 4510.02, Harris County, Texas	23.3%
482014511001	Block Group 1, Census Tract 4511, Harris County, Texas	19.4%
482014511002	Block Group 2, Census Tract 4511, Harris County, Texas	45.8%
482014511003	Block Group 3, Census Tract 4511, Harris County, Texas	1.4%
482014511004	Block Group 4, Census Tract 4511, Harris County, Texas	55.2%
482014512001	Block Group 1, Census Tract 4512, Harris County, Texas	10.2%
482014512002	Block Group 2, Census Tract 4512, Harris County, Texas	13.6%
482014513001	Block Group 1, Census Tract 4513, Harris County, Texas	6.6%
482014513002	Block Group 2, Census Tract 4513, Harris County, Texas	67.6%
482014513003	Block Group 3, Census Tract 4513, Harris County, Texas	31.7%
482014513004	Block Group 4, Census Tract 4513, Harris County, Texas	16.5%
482014514011	Block Group 1, Census Tract 4514.01, Harris County, Texas	35.6%
482014514012	Block Group 2, Census Tract 4514.01, Harris County, Texas	38.0%
482014514021	Block Group 1, Census Tract 4514.02, Harris County, Texas	56.4%
482014514022	Block Group 2, Census Tract 4514.02, Harris County, Texas	43.3%
482014514031	Block Group 1, Census Tract 4514.03, Harris County, Texas	68.9%
482014514032	Block Group 2, Census Tract 4514.03, Harris County, Texas	39.2%
482014515001	Block Group 1, Census Tract 4515, Harris County, Texas	16.8%
482014515002	Block Group 2, Census Tract 4515, Harris County, Texas	38.1%
482014516011	Block Group 1, Census Tract 4516.01, Harris County, Texas	6.9%
482014516012	Block Group 2, Census Tract 4516.01, Harris County, Texas	17.4%
482014516021	Block Group 1, Census Tract 4516.02, Harris County, Texas	16.0%
482014516022	Block Group 2, Census Tract 4516.02, Harris County, Texas	9.7%
482014517001	Block Group 1, Census Tract 4517, Harris County, Texas	47.9%
482014517002	Block Group 2, Census Tract 4517, Harris County, Texas	45.8%
482014518001	Block Group 1, Census Tract 4518, Harris County, Texas	60.7%
482014518002	Block Group 2, Census Tract 4518, Harris County, Texas	28.4%
482014518003	Block Group 3, Census Tract 4518, Harris County, Texas	59.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014519011	Block Group 1, Census Tract 4519.01, Harris County, Texas	11.8%
482014519012	Block Group 2, Census Tract 4519.01, Harris County, Texas	28.1%
482014519013	Block Group 3, Census Tract 4519.01, Harris County, Texas	57.4%
482014519014	Block Group 4, Census Tract 4519.01, Harris County, Texas	61.8%
482014519021	Block Group 1, Census Tract 4519.02, Harris County, Texas	20.1%
482014520001	Block Group 1, Census Tract 4520, Harris County, Texas	34.7%
482014520002	Block Group 2, Census Tract 4520, Harris County, Texas	68.5%
482014520003	Block Group 3, Census Tract 4520, Harris County, Texas	44.7%
482014521001	Block Group 1, Census Tract 4521, Harris County, Texas	53.8%
482014521002	Block Group 2, Census Tract 4521, Harris County, Texas	30.5%
482014521003	Block Group 3, Census Tract 4521, Harris County, Texas	37.6%
482014522011	Block Group 1, Census Tract 4522.01, Harris County, Texas	69.7%
482014522012	Block Group 2, Census Tract 4522.01, Harris County, Texas	50.9%
482014522013	Block Group 3, Census Tract 4522.01, Harris County, Texas	37.0%
482014522014	Block Group 4, Census Tract 4522.01, Harris County, Texas	67.0%
482014522021	Block Group 1, Census Tract 4522.02, Harris County, Texas	33.7%
482014522022	Block Group 2, Census Tract 4522.02, Harris County, Texas	50.3%
482014523001	Block Group 1, Census Tract 4523, Harris County, Texas	66.1%
482014524001	Block Group 1, Census Tract 4524, Harris County, Texas	63.8%
482014524002	Block Group 2, Census Tract 4524, Harris County, Texas	62.7%
482014524003	Block Group 3, Census Tract 4524, Harris County, Texas	83.5%
482014524004	Block Group 4, Census Tract 4524, Harris County, Texas	66.1%
482014525001	Block Group 1, Census Tract 4525, Harris County, Texas	87.3%
482014525002	Block Group 2, Census Tract 4525, Harris County, Texas	68.2%
482014525003	Block Group 3, Census Tract 4525, Harris County, Texas	40.7%
482014526001	Block Group 1, Census Tract 4526, Harris County, Texas	73.4%
482014526002	Block Group 2, Census Tract 4526, Harris County, Texas	44.4%
482014526003	Block Group 3, Census Tract 4526, Harris County, Texas	61.7%
482014527001	Block Group 1, Census Tract 4527, Harris County, Texas	39.8%
482014527002	Block Group 2, Census Tract 4527, Harris County, Texas	50.3%
482014527003	Block Group 3, Census Tract 4527, Harris County, Texas	44.7%
482014527004	Block Group 4, Census Tract 4527, Harris County, Texas	69.4%
482014528011	Block Group 1, Census Tract 4528.01, Harris County, Texas	51.5%
482014528012	Block Group 2, Census Tract 4528.01, Harris County, Texas	43.2%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014528013	Block Group 3, Census Tract 4528.01, Harris County, Texas	79.8%
482014528021	Block Group 1, Census Tract 4528.02, Harris County, Texas	69.4%
482014528022	Block Group 2, Census Tract 4528.02, Harris County, Texas	68.0%
482014529001	Block Group 1, Census Tract 4529, Harris County, Texas	64.8%
482014529002	Block Group 2, Census Tract 4529, Harris County, Texas	64.6%
482014530001	Block Group 1, Census Tract 4530, Harris County, Texas	62.4%
482014530002	Block Group 2, Census Tract 4530, Harris County, Texas	63.3%
482014530003	Block Group 3, Census Tract 4530, Harris County, Texas	62.3%
482014531001	Block Group 1, Census Tract 4531, Harris County, Texas	87.8%
482014531002	Block Group 2, Census Tract 4531, Harris County, Texas	49.8%
482014532001	Block Group 1, Census Tract 4532, Harris County, Texas	44.4%
482014532002	Block Group 2, Census Tract 4532, Harris County, Texas	91.2%
482014532003	Block Group 3, Census Tract 4532, Harris County, Texas	88.0%
482014533001	Block Group 1, Census Tract 4533, Harris County, Texas	88.0%
482014534011	Block Group 1, Census Tract 4534.01, Harris County, Texas	74.3%
482014534012	Block Group 2, Census Tract 4534.01, Harris County, Texas	32.0%
482014534021	Block Group 1, Census Tract 4534.02, Harris County, Texas	52.5%
482014534022	Block Group 2, Census Tract 4534.02, Harris County, Texas	76.4%
482014534023	Block Group 3, Census Tract 4534.02, Harris County, Texas	63.8%
482014534024	Block Group 4, Census Tract 4534.02, Harris County, Texas	65.9%
482014534031	Block Group 1, Census Tract 4534.03, Harris County, Texas	60.9%
482014534032	Block Group 2, Census Tract 4534.03, Harris County, Texas	94.0%
482014535011	Block Group 1, Census Tract 4535.01, Harris County, Texas	66.2%
482014535012	Block Group 2, Census Tract 4535.01, Harris County, Texas	50.8%
482014535013	Block Group 3, Census Tract 4535.01, Harris County, Texas	53.8%
482014535021	Block Group 1, Census Tract 4535.02, Harris County, Texas	34.0%
482014535022	Block Group 2, Census Tract 4535.02, Harris County, Texas	59.4%
482014536011	Block Group 1, Census Tract 4536.01, Harris County, Texas	40.7%
482014536021	Block Group 1, Census Tract 4536.02, Harris County, Texas	71.2%
482014536022	Block Group 2, Census Tract 4536.02, Harris County, Texas	77.1%
482014536023	Block Group 3, Census Tract 4536.02, Harris County, Texas	59.7%
482014536024	Block Group 4, Census Tract 4536.02, Harris County, Texas	54.2%
482014537001	Block Group 1, Census Tract 4537, Harris County, Texas	61.6%
482014537002	Block Group 2, Census Tract 4537, Harris County, Texas	48.3%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014537003	Block Group 3, Census Tract 4537, Harris County, Texas	74.0%
482014537004	Block Group 4, Census Tract 4537, Harris County, Texas	55.9%
482014538001	Block Group 1, Census Tract 4538, Harris County, Texas	38.0%
482014538002	Block Group 2, Census Tract 4538, Harris County, Texas	43.8%
482014539001	Block Group 1, Census Tract 4539, Harris County, Texas	53.1%
482014539002	Block Group 2, Census Tract 4539, Harris County, Texas	36.2%
482014539003	Block Group 3, Census Tract 4539, Harris County, Texas	67.6%
482014540001	Block Group 1, Census Tract 4540, Harris County, Texas	43.4%
482014540002	Block Group 2, Census Tract 4540, Harris County, Texas	26.0%
482014541001	Block Group 1, Census Tract 4541, Harris County, Texas	40.3%
482014541002	Block Group 2, Census Tract 4541, Harris County, Texas	53.9%
482014542001	Block Group 1, Census Tract 4542, Harris County, Texas	44.1%
482014542002	Block Group 2, Census Tract 4542, Harris County, Texas	29.2%
482014543011	Block Group 1, Census Tract 4543.01, Harris County, Texas	41.4%
482014543012	Block Group 2, Census Tract 4543.01, Harris County, Texas	58.9%
482014543013	Block Group 3, Census Tract 4543.01, Harris County, Texas	65.1%
482014543014	Block Group 4, Census Tract 4543.01, Harris County, Texas	39.1%
482014543021	Block Group 1, Census Tract 4543.02, Harris County, Texas	43.6%
482014543022	Block Group 2, Census Tract 4543.02, Harris County, Texas	53.7%
482014544001	Block Group 1, Census Tract 4544, Harris County, Texas	35.7%
482014545011	Block Group 1, Census Tract 4545.01, Harris County, Texas	0.0%
482014545012	Block Group 2, Census Tract 4545.01, Harris County, Texas	10.9%
482014545013	Block Group 3, Census Tract 4545.01, Harris County, Texas	9.0%
482014545021	Block Group 1, Census Tract 4545.02, Harris County, Texas	8.8%
482014546001	Block Group 1, Census Tract 4546, Harris County, Texas	28.2%
482014547001	Block Group 1, Census Tract 4547, Harris County, Texas	11.3%
482014547002	Block Group 2, Census Tract 4547, Harris County, Texas	34.9%
482014547003	Block Group 3, Census Tract 4547, Harris County, Texas	3.5%
482014547004	Block Group 4, Census Tract 4547, Harris County, Texas	15.8%
482014548001	Block Group 1, Census Tract 4548, Harris County, Texas	9.6%
482014548002	Block Group 2, Census Tract 4548, Harris County, Texas	35.2%
482014548003	Block Group 3, Census Tract 4548, Harris County, Texas	34.7%
482014549001	Block Group 1, Census Tract 4549, Harris County, Texas	3.0%
482014549002	Block Group 2, Census Tract 4549, Harris County, Texas	19.3%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482014550001	Block Group 1, Census Tract 4550, Harris County, Texas	13.2%
482014551011	Block Group 1, Census Tract 4551.01, Harris County, Texas	46.2%
482014551012	Block Group 2, Census Tract 4551.01, Harris County, Texas	30.9%
482014551013	Block Group 3, Census Tract 4551.01, Harris County, Texas	17.4%
482014551014	Block Group 4, Census Tract 4551.01, Harris County, Texas	21.9%
482014551021	Block Group 1, Census Tract 4551.02, Harris County, Texas	10.5%
482014551022	Block Group 2, Census Tract 4551.02, Harris County, Texas	22.4%
482014552001	Block Group 1, Census Tract 4552, Harris County, Texas	15.8%
482014552002	Block Group 2, Census Tract 4552, Harris County, Texas	14.0%
482014552003	Block Group 3, Census Tract 4552, Harris County, Texas	0.9%
482014553001	Block Group 1, Census Tract 4553, Harris County, Texas	39.5%
482015101001	Block Group 1, Census Tract 5101, Harris County, Texas	50.9%
482015101002	Block Group 2, Census Tract 5101, Harris County, Texas	83.3%
482015102001	Block Group 1, Census Tract 5102, Harris County, Texas	65.1%
482015102002	Block Group 2, Census Tract 5102, Harris County, Texas	28.7%
482015103001	Block Group 1, Census Tract 5103, Harris County, Texas	22.0%
482015103002	Block Group 2, Census Tract 5103, Harris County, Texas	17.8%
482015103003	Block Group 3, Census Tract 5103, Harris County, Texas	13.4%
482015103004	Block Group 4, Census Tract 5103, Harris County, Texas	11.9%
482015103005	Block Group 5, Census Tract 5103, Harris County, Texas	40.5%
482015104001	Block Group 1, Census Tract 5104, Harris County, Texas	44.0%
482015104002	Block Group 2, Census Tract 5104, Harris County, Texas	32.3%
482015104003	Block Group 3, Census Tract 5104, Harris County, Texas	24.6%
482015105001	Block Group 1, Census Tract 5105, Harris County, Texas	41.0%
482015105002	Block Group 2, Census Tract 5105, Harris County, Texas	69.6%
482015105003	Block Group 3, Census Tract 5105, Harris County, Texas	20.1%
482015106001	Block Group 1, Census Tract 5106, Harris County, Texas	54.2%
482015106002	Block Group 2, Census Tract 5106, Harris County, Texas	47.6%
482015106003	Block Group 3, Census Tract 5106, Harris County, Texas	19.1%
482015107001	Block Group 1, Census Tract 5107, Harris County, Texas	13.1%
482015107002	Block Group 2, Census Tract 5107, Harris County, Texas	31.3%
482015108001	Block Group 1, Census Tract 5108, Harris County, Texas	8.7%
482015108002	Block Group 2, Census Tract 5108, Harris County, Texas	11.0%
482015108003	Block Group 3, Census Tract 5108, Harris County, Texas	18.4%



Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015108004	Block Group 4, Census Tract 5108, Harris County, Texas	18.9%
482015108005	Block Group 5, Census Tract 5108, Harris County, Texas	37.5%
482015108006	Block Group 6, Census Tract 5108, Harris County, Texas	9.1%
482015109001	Block Group 1, Census Tract 5109, Harris County, Texas	20.7%
482015109002	Block Group 2, Census Tract 5109, Harris County, Texas	41.3%
482015109003	Block Group 3, Census Tract 5109, Harris County, Texas	35.8%
482015110011	Block Group 1, Census Tract 5110.01, Harris County, Texas	17.6%
482015110012	Block Group 2, Census Tract 5110.01, Harris County, Texas	39.9%
482015110021	Block Group 1, Census Tract 5110.02, Harris County, Texas	25.8%
482015110022	Block Group 2, Census Tract 5110.02, Harris County, Texas	45.4%
482015110023	Block Group 3, Census Tract 5110.02, Harris County, Texas	11.7%
482015111001	Block Group 1, Census Tract 5111, Harris County, Texas	40.4%
482015111002	Block Group 2, Census Tract 5111, Harris County, Texas	40.4%
482015112001	Block Group 1, Census Tract 5112, Harris County, Texas	47.1%
482015112002	Block Group 2, Census Tract 5112, Harris County, Texas	35.4%
482015112003	Block Group 3, Census Tract 5112, Harris County, Texas	11.5%
482015113011	Block Group 1, Census Tract 5113.01, Harris County, Texas	39.9%
482015113012	Block Group 2, Census Tract 5113.01, Harris County, Texas	6.5%
482015113013	Block Group 3, Census Tract 5113.01, Harris County, Texas	49.0%
482015113014	Block Group 4, Census Tract 5113.01, Harris County, Texas	33.1%
482015113021	Block Group 1, Census Tract 5113.02, Harris County, Texas	18.4%
482015113022	Block Group 2, Census Tract 5113.02, Harris County, Texas	41.9%
482015113023	Block Group 3, Census Tract 5113.02, Harris County, Texas	51.3%
482015114001	Block Group 1, Census Tract 5114, Harris County, Texas	32.4%
482015114002	Block Group 2, Census Tract 5114, Harris County, Texas	25.1%
482015114003	Block Group 3, Census Tract 5114, Harris County, Texas	62.9%
482015115001	Block Group 1, Census Tract 5115, Harris County, Texas	77.3%
482015115002	Block Group 2, Census Tract 5115, Harris County, Texas	61.4%
482015115003	Block Group 3, Census Tract 5115, Harris County, Texas	40.0%
482015115004	Block Group 4, Census Tract 5115, Harris County, Texas	17.1%
482015115005	Block Group 5, Census Tract 5115, Harris County, Texas	50.8%
482015115006	Block Group 6, Census Tract 5115, Harris County, Texas	21.2%
482015115007	Block Group 7, Census Tract 5115, Harris County, Texas	47.6%
482015116001	Block Group 1, Census Tract 5116, Harris County, Texas	67.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015116002	Block Group 2, Census Tract 5116, Harris County, Texas	65.1%
482015116003	Block Group 3, Census Tract 5116, Harris County, Texas	64.7%
482015116004	Block Group 4, Census Tract 5116, Harris County, Texas	56.4%
482015201001	Block Group 1, Census Tract 5201, Harris County, Texas	48.5%
482015202001	Block Group 1, Census Tract 5202, Harris County, Texas	14.7%
482015202002	Block Group 2, Census Tract 5202, Harris County, Texas	11.6%
482015202003	Block Group 3, Census Tract 5202, Harris County, Texas	33.8%
482015203001	Block Group 1, Census Tract 5203, Harris County, Texas	51.8%
482015203002	Block Group 2, Census Tract 5203, Harris County, Texas	87.1%
482015203003	Block Group 3, Census Tract 5203, Harris County, Texas	45.5%
482015204001	Block Group 1, Census Tract 5204, Harris County, Texas	77.0%
482015204002	Block Group 2, Census Tract 5204, Harris County, Texas	74.6%
482015205001	Block Group 1, Census Tract 5205, Harris County, Texas	80.0%
482015205002	Block Group 2, Census Tract 5205, Harris County, Texas	81.8%
482015205003	Block Group 3, Census Tract 5205, Harris County, Texas	63.0%
482015205004	Block Group 4, Census Tract 5205, Harris County, Texas	52.9%
482015206011	Block Group 1, Census Tract 5206.01, Harris County, Texas	75.9%
482015206021	Block Group 1, Census Tract 5206.02, Harris County, Texas	76.3%
482015206022	Block Group 2, Census Tract 5206.02, Harris County, Texas	73.8%
482015206023	Block Group 3, Census Tract 5206.02, Harris County, Texas	65.4%
482015206024	Block Group 4, Census Tract 5206.02, Harris County, Texas	68.2%
482015207001	Block Group 1, Census Tract 5207, Harris County, Texas	50.4%
482015207002	Block Group 2, Census Tract 5207, Harris County, Texas	34.3%
482015207003	Block Group 3, Census Tract 5207, Harris County, Texas	29.8%
482015207004	Block Group 4, Census Tract 5207, Harris County, Texas	48.5%
482015210001	Block Group 1, Census Tract 5210, Harris County, Texas	80.3%
482015211001	Block Group 1, Census Tract 5211, Harris County, Texas	68.1%
482015212001	Block Group 1, Census Tract 5212, Harris County, Texas	84.1%
482015212002	Block Group 2, Census Tract 5212, Harris County, Texas	57.5%
482015212003	Block Group 3, Census Tract 5212, Harris County, Texas	68.0%
482015213001	Block Group 1, Census Tract 5213, Harris County, Texas	61.0%
482015213002	Block Group 2, Census Tract 5213, Harris County, Texas	62.5%
482015213003	Block Group 3, Census Tract 5213, Harris County, Texas	38.5%
482015213004	Block Group 4, Census Tract 5213, Harris County, Texas	56.3%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015214001	Block Group 1, Census Tract 5214, Harris County, Texas	91.0%
482015214002	Block Group 2, Census Tract 5214, Harris County, Texas	95.0%
482015214003	Block Group 3, Census Tract 5214, Harris County, Texas	54.1%
482015214004	Block Group 4, Census Tract 5214, Harris County, Texas	84.9%
482015215001	Block Group 1, Census Tract 5215, Harris County, Texas	84.6%
482015215002	Block Group 2, Census Tract 5215, Harris County, Texas	55.0%
482015215003	Block Group 3, Census Tract 5215, Harris County, Texas	54.2%
482015215004	Block Group 4, Census Tract 5215, Harris County, Texas	24.8%
482015216001	Block Group 1, Census Tract 5216, Harris County, Texas	51.4%
482015216002	Block Group 2, Census Tract 5216, Harris County, Texas	76.4%
482015217001	Block Group 1, Census Tract 5217, Harris County, Texas	86.5%
482015217002	Block Group 2, Census Tract 5217, Harris County, Texas	81.6%
482015217003	Block Group 3, Census Tract 5217, Harris County, Texas	61.2%
482015217004	Block Group 4, Census Tract 5217, Harris County, Texas	77.9%
482015218001	Block Group 1, Census Tract 5218, Harris County, Texas	42.9%
482015218002	Block Group 2, Census Tract 5218, Harris County, Texas	29.8%
482015219001	Block Group 1, Census Tract 5219, Harris County, Texas	18.8%
482015219002	Block Group 2, Census Tract 5219, Harris County, Texas	58.0%
482015219003	Block Group 3, Census Tract 5219, Harris County, Texas	46.0%
482015220001	Block Group 1, Census Tract 5220, Harris County, Texas	35.7%
482015220002	Block Group 2, Census Tract 5220, Harris County, Texas	44.0%
482015220003	Block Group 3, Census Tract 5220, Harris County, Texas	63.8%
482015221001	Block Group 1, Census Tract 5221, Harris County, Texas	76.8%
482015221002	Block Group 2, Census Tract 5221, Harris County, Texas	41.8%
482015221003	Block Group 3, Census Tract 5221, Harris County, Texas	69.0%
482015221004	Block Group 4, Census Tract 5221, Harris County, Texas	74.7%
482015222011	Block Group 1, Census Tract 5222.01, Harris County, Texas	46.1%
482015222012	Block Group 2, Census Tract 5222.01, Harris County, Texas	46.2%
482015222021	Block Group 1, Census Tract 5222.02, Harris County, Texas	31.1%
482015222022	Block Group 2, Census Tract 5222.02, Harris County, Texas	39.6%
482015223011	Block Group 1, Census Tract 5223.01, Harris County, Texas	62.4%
482015223012	Block Group 2, Census Tract 5223.01, Harris County, Texas	71.5%
482015223021	Block Group 1, Census Tract 5223.02, Harris County, Texas	65.0%
482015223022	Block Group 2, Census Tract 5223.02, Harris County, Texas	29.4%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015224011	Block Group 1, Census Tract 5224.01, Harris County, Texas	21.0%
482015224012	Block Group 2, Census Tract 5224.01, Harris County, Texas	24.3%
482015224013	Block Group 3, Census Tract 5224.01, Harris County, Texas	56.4%
482015224014	Block Group 4, Census Tract 5224.01, Harris County, Texas	91.4%
482015224021	Block Group 1, Census Tract 5224.02, Harris County, Texas	46.6%
482015224022	Block Group 2, Census Tract 5224.02, Harris County, Texas	37.0%
482015225001	Block Group 1, Census Tract 5225, Harris County, Texas	11.6%
482015225002	Block Group 2, Census Tract 5225, Harris County, Texas	17.1%
482015225003	Block Group 3, Census Tract 5225, Harris County, Texas	7.6%
482015225004	Block Group 4, Census Tract 5225, Harris County, Texas	6.8%
482015301001	Block Group 1, Census Tract 5301, Harris County, Texas	50.6%
482015301002	Block Group 2, Census Tract 5301, Harris County, Texas	74.8%
482015301003	Block Group 3, Census Tract 5301, Harris County, Texas	69.6%
482015301004	Block Group 4, Census Tract 5301, Harris County, Texas	77.3%
482015302001	Block Group 1, Census Tract 5302, Harris County, Texas	15.1%
482015302002	Block Group 2, Census Tract 5302, Harris County, Texas	54.1%
482015302003	Block Group 3, Census Tract 5302, Harris County, Texas	49.0%
482015303001	Block Group 1, Census Tract 5303, Harris County, Texas	89.5%
482015303002	Block Group 2, Census Tract 5303, Harris County, Texas	69.1%
482015303003	Block Group 3, Census Tract 5303, Harris County, Texas	78.8%
482015304001	Block Group 1, Census Tract 5304, Harris County, Texas	73.2%
482015304002	Block Group 2, Census Tract 5304, Harris County, Texas	79.7%
482015305001	Block Group 1, Census Tract 5305, Harris County, Texas	78.4%
482015305002	Block Group 2, Census Tract 5305, Harris County, Texas	55.5%
482015305003	Block Group 3, Census Tract 5305, Harris County, Texas	91.2%
482015306001	Block Group 1, Census Tract 5306, Harris County, Texas	79.7%
482015306002	Block Group 2, Census Tract 5306, Harris County, Texas	54.7%
482015307001	Block Group 1, Census Tract 5307, Harris County, Texas	88.3%
482015307002	Block Group 2, Census Tract 5307, Harris County, Texas	60.0%
482015307003	Block Group 3, Census Tract 5307, Harris County, Texas	61.0%
482015308001	Block Group 1, Census Tract 5308, Harris County, Texas	81.4%
482015308002	Block Group 2, Census Tract 5308, Harris County, Texas	56.1%
482015308003	Block Group 3, Census Tract 5308, Harris County, Texas	31.7%
482015309001	Block Group 1, Census Tract 5309, Harris County, Texas	42.1%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015309002	Block Group 2, Census Tract 5309, Harris County, Texas	58.8%
482015309003	Block Group 3, Census Tract 5309, Harris County, Texas	23.1%
482015310001	Block Group 1, Census Tract 5310, Harris County, Texas	44.1%
482015310002	Block Group 2, Census Tract 5310, Harris County, Texas	40.3%
482015311001	Block Group 1, Census Tract 5311, Harris County, Texas	32.6%
482015311002	Block Group 2, Census Tract 5311, Harris County, Texas	47.7%
482015312001	Block Group 1, Census Tract 5312, Harris County, Texas	48.1%
482015312002	Block Group 2, Census Tract 5312, Harris County, Texas	31.7%
482015312003	Block Group 3, Census Tract 5312, Harris County, Texas	45.7%
482015313001	Block Group 1, Census Tract 5313, Harris County, Texas	93.7%
482015313002	Block Group 2, Census Tract 5313, Harris County, Texas	25.7%
482015313003	Block Group 3, Census Tract 5313, Harris County, Texas	80.2%
482015314001	Block Group 1, Census Tract 5314, Harris County, Texas	34.3%
482015315001	Block Group 1, Census Tract 5315, Harris County, Texas	62.9%
482015315002	Block Group 2, Census Tract 5315, Harris County, Texas	34.4%
482015315003	Block Group 3, Census Tract 5315, Harris County, Texas	46.2%
482015316001	Block Group 1, Census Tract 5316, Harris County, Texas	22.6%
482015316002	Block Group 2, Census Tract 5316, Harris County, Texas	30.0%
482015317001	Block Group 1, Census Tract 5317, Harris County, Texas	17.1%
482015317002	Block Group 2, Census Tract 5317, Harris County, Texas	15.8%
482015318001	Block Group 1, Census Tract 5318, Harris County, Texas	74.1%
482015318002	Block Group 2, Census Tract 5318, Harris County, Texas	55.5%
482015319001	Block Group 1, Census Tract 5319, Harris County, Texas	83.9%
482015319002	Block Group 2, Census Tract 5319, Harris County, Texas	67.4%
482015319003	Block Group 3, Census Tract 5319, Harris County, Texas	48.4%
482015320011	Block Group 1, Census Tract 5320.01, Harris County, Texas	78.0%
482015320012	Block Group 2, Census Tract 5320.01, Harris County, Texas	57.9%
482015320013	Block Group 3, Census Tract 5320.01, Harris County, Texas	62.3%
482015320014	Block Group 4, Census Tract 5320.01, Harris County, Texas	93.1%
482015320021	Block Group 1, Census Tract 5320.02, Harris County, Texas	16.8%
482015321001	Block Group 1, Census Tract 5321, Harris County, Texas	72.7%
482015321002	Block Group 2, Census Tract 5321, Harris County, Texas	68.6%
482015321003	Block Group 3, Census Tract 5321, Harris County, Texas	23.4%
482015321004	Block Group 4, Census Tract 5321, Harris County, Texas	95.7%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015322001	Block Group 1, Census Tract 5322, Harris County, Texas	94.1%
482015322002	Block Group 2, Census Tract 5322, Harris County, Texas	66.5%
482015323001	Block Group 1, Census Tract 5323, Harris County, Texas	24.4%
482015323002	Block Group 2, Census Tract 5323, Harris County, Texas	0.0%
482015323003	Block Group 3, Census Tract 5323, Harris County, Texas	58.5%
482015323004	Block Group 4, Census Tract 5323, Harris County, Texas	31.0%
482015324001	Block Group 1, Census Tract 5324, Harris County, Texas	45.4%
482015324002	Block Group 2, Census Tract 5324, Harris County, Texas	19.7%
482015324003	Block Group 3, Census Tract 5324, Harris County, Texas	52.9%
482015325011	Block Group 1, Census Tract 5325.01, Harris County, Texas	38.7%
482015325012	Block Group 2, Census Tract 5325.01, Harris County, Texas	33.2%
482015325013	Block Group 3, Census Tract 5325.01, Harris County, Texas	48.8%
482015325021	Block Group 1, Census Tract 5325.02, Harris County, Texas	64.2%
482015325022	Block Group 2, Census Tract 5325.02, Harris County, Texas	45.8%
482015325023	Block Group 3, Census Tract 5325.02, Harris County, Texas	57.5%
482015326001	Block Group 1, Census Tract 5326, Harris County, Texas	56.6%
482015326002	Block Group 2, Census Tract 5326, Harris County, Texas	42.3%
482015326003	Block Group 3, Census Tract 5326, Harris County, Texas	49.6%
482015327001	Block Group 1, Census Tract 5327, Harris County, Texas	55.3%
482015327002	Block Group 2, Census Tract 5327, Harris County, Texas	28.3%
482015327003	Block Group 3, Census Tract 5327, Harris County, Texas	46.0%
482015328001	Block Group 1, Census Tract 5328, Harris County, Texas	53.9%
482015329001	Block Group 1, Census Tract 5329, Harris County, Texas	58.2%
482015329002	Block Group 2, Census Tract 5329, Harris County, Texas	55.1%
482015329003	Block Group 3, Census Tract 5329, Harris County, Texas	27.6%
482015330001	Block Group 1, Census Tract 5330, Harris County, Texas	92.2%
482015331001	Block Group 1, Census Tract 5331, Harris County, Texas	40.9%
482015331002	Block Group 2, Census Tract 5331, Harris County, Texas	70.9%
482015331003	Block Group 3, Census Tract 5331, Harris County, Texas	42.0%
482015332001	Block Group 1, Census Tract 5332, Harris County, Texas	80.9%
482015332002	Block Group 2, Census Tract 5332, Harris County, Texas	86.3%
482015332003	Block Group 3, Census Tract 5332, Harris County, Texas	60.2%
482015333001	Block Group 1, Census Tract 5333, Harris County, Texas	65.2%
482015333002	Block Group 2, Census Tract 5333, Harris County, Texas	87.0%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015333003	Block Group 3, Census Tract 5333, Harris County, Texas	69.3%
482015333004	Block Group 4, Census Tract 5333, Harris County, Texas	82.3%
482015334001	Block Group 1, Census Tract 5334, Harris County, Texas	87.7%
482015334002	Block Group 2, Census Tract 5334, Harris County, Texas	62.5%
482015334003	Block Group 3, Census Tract 5334, Harris County, Texas	31.0%
482015334004	Block Group 4, Census Tract 5334, Harris County, Texas	64.5%
482015335001	Block Group 1, Census Tract 5335, Harris County, Texas	44.2%
482015335002	Block Group 2, Census Tract 5335, Harris County, Texas	48.3%
482015335003	Block Group 3, Census Tract 5335, Harris County, Texas	51.0%
482015336001	Block Group 1, Census Tract 5336, Harris County, Texas	91.3%
482015336002	Block Group 2, Census Tract 5336, Harris County, Texas	62.1%
482015337011	Block Group 1, Census Tract 5337.01, Harris County, Texas	92.9%
482015337012	Block Group 2, Census Tract 5337.01, Harris County, Texas	54.0%
482015337013	Block Group 3, Census Tract 5337.01, Harris County, Texas	69.1%
482015337021	Block Group 1, Census Tract 5337.02, Harris County, Texas	42.0%
482015337022	Block Group 2, Census Tract 5337.02, Harris County, Texas	66.9%
482015338011	Block Group 1, Census Tract 5338.01, Harris County, Texas	59.3%
482015338012	Block Group 2, Census Tract 5338.01, Harris County, Texas	42.2%
482015338021	Block Group 1, Census Tract 5338.02, Harris County, Texas	80.8%
482015338022	Block Group 2, Census Tract 5338.02, Harris County, Texas	56.9%
482015338023	Block Group 3, Census Tract 5338.02, Harris County, Texas	51.2%
482015339011	Block Group 1, Census Tract 5339.01, Harris County, Texas	46.1%
482015339012	Block Group 2, Census Tract 5339.01, Harris County, Texas	64.5%
482015339013	Block Group 3, Census Tract 5339.01, Harris County, Texas	49.7%
482015339021	Block Group 1, Census Tract 5339.02, Harris County, Texas	84.2%
482015339022	Block Group 2, Census Tract 5339.02, Harris County, Texas	76.8%
482015340011	Block Group 1, Census Tract 5340.01, Harris County, Texas	81.8%
482015340021	Block Group 1, Census Tract 5340.02, Harris County, Texas	57.9%
482015340022	Block Group 2, Census Tract 5340.02, Harris County, Texas	44.4%
482015340031	Block Group 1, Census Tract 5340.03, Harris County, Texas	43.4%
482015341001	Block Group 1, Census Tract 5341, Harris County, Texas	31.9%
482015341002	Block Group 2, Census Tract 5341, Harris County, Texas	67.9%
482015341003	Block Group 3, Census Tract 5341, Harris County, Texas	28.3%
482015342011	Block Group 1, Census Tract 5342.01, Harris County, Texas	67.5%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015342021	Block Group 1, Census Tract 5342.02, Harris County, Texas	26.3%
482015342022	Block Group 2, Census Tract 5342.02, Harris County, Texas	35.9%
482015342023	Block Group 3, Census Tract 5342.02, Harris County, Texas	23.1%
482015342024	Block Group 4, Census Tract 5342.02, Harris County, Texas	20.2%
482015342031	Block Group 1, Census Tract 5342.03, Harris County, Texas	55.5%
482015401001	Block Group 1, Census Tract 5401, Harris County, Texas	8.5%
482015401002	Block Group 2, Census Tract 5401, Harris County, Texas	18.9%
482015401003	Block Group 3, Census Tract 5401, Harris County, Texas	27.7%
482015402001	Block Group 1, Census Tract 5402, Harris County, Texas	57.9%
482015405011	Block Group 1, Census Tract 5405.01, Harris County, Texas	68.2%
482015405012	Block Group 2, Census Tract 5405.01, Harris County, Texas	96.1%
482015405013	Block Group 3, Census Tract 5405.01, Harris County, Texas	73.1%
482015405021	Block Group 1, Census Tract 5405.02, Harris County, Texas	10.7%
482015405022	Block Group 2, Census Tract 5405.02, Harris County, Texas	11.3%
482015405023	Block Group 3, Census Tract 5405.02, Harris County, Texas	53.0%
482015406011	Block Group 1, Census Tract 5406.01, Harris County, Texas	13.9%
482015406012	Block Group 2, Census Tract 5406.01, Harris County, Texas	10.7%
482015406021	Block Group 1, Census Tract 5406.02, Harris County, Texas	39.3%
482015406022	Block Group 2, Census Tract 5406.02, Harris County, Texas	21.6%
482015407001	Block Group 1, Census Tract 5407, Harris County, Texas	26.7%
482015407002	Block Group 2, Census Tract 5407, Harris County, Texas	50.3%
482015407003	Block Group 3, Census Tract 5407, Harris County, Texas	35.9%
482015408001	Block Group 1, Census Tract 5408, Harris County, Texas	42.4%
482015408002	Block Group 2, Census Tract 5408, Harris County, Texas	33.3%
482015408003	Block Group 3, Census Tract 5408, Harris County, Texas	38.9%
482015409011	Block Group 1, Census Tract 5409.01, Harris County, Texas	4.1%
482015409021	Block Group 1, Census Tract 5409.02, Harris County, Texas	44.1%
482015409022	Block Group 2, Census Tract 5409.02, Harris County, Texas	26.2%
482015409023	Block Group 3, Census Tract 5409.02, Harris County, Texas	12.2%
482015410011	Block Group 1, Census Tract 5410.01, Harris County, Texas	25.2%
482015410012	Block Group 2, Census Tract 5410.01, Harris County, Texas	53.1%
482015410021	Block Group 1, Census Tract 5410.02, Harris County, Texas	13.6%
482015410022	Block Group 2, Census Tract 5410.02, Harris County, Texas	13.0%
482015410031	Block Group 1, Census Tract 5410.03, Harris County, Texas	6.4%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015410032	Block Group 2, Census Tract 5410.03, Harris County, Texas	9.5%
482015411001	Block Group 1, Census Tract 5411, Harris County, Texas	13.1%
482015411002	Block Group 2, Census Tract 5411, Harris County, Texas	4.4%
482015411003	Block Group 3, Census Tract 5411, Harris County, Texas	16.2%
482015412011	Block Group 1, Census Tract 5412.01, Harris County, Texas	19.9%
482015412012	Block Group 2, Census Tract 5412.01, Harris County, Texas	13.5%
482015412021	Block Group 1, Census Tract 5412.02, Harris County, Texas	12.0%
482015412022	Block Group 2, Census Tract 5412.02, Harris County, Texas	36.5%
482015412023	Block Group 3, Census Tract 5412.02, Harris County, Texas	0.0%
482015412024	Block Group 4, Census Tract 5412.02, Harris County, Texas	30.3%
482015412031	Block Group 1, Census Tract 5412.03, Harris County, Texas	11.4%
482015412032	Block Group 2, Census Tract 5412.03, Harris County, Texas	19.6%
482015413001	Block Group 1, Census Tract 5413, Harris County, Texas	53.1%
482015413002	Block Group 2, Census Tract 5413, Harris County, Texas	73.5%
482015413003	Block Group 3, Census Tract 5413, Harris County, Texas	64.1%
482015413004	Block Group 4, Census Tract 5413, Harris County, Texas	42.0%
482015414001	Block Group 1, Census Tract 5414, Harris County, Texas	24.7%
482015414002	Block Group 2, Census Tract 5414, Harris County, Texas	52.1%
482015415001	Block Group 1, Census Tract 5415, Harris County, Texas	23.8%
482015415002	Block Group 2, Census Tract 5415, Harris County, Texas	29.9%
482015416011	Block Group 1, Census Tract 5416.01, Harris County, Texas	18.8%
482015416012	Block Group 2, Census Tract 5416.01, Harris County, Texas	5.9%
482015416021	Block Group 1, Census Tract 5416.02, Harris County, Texas	72.5%
482015416022	Block Group 2, Census Tract 5416.02, Harris County, Texas	35.9%
482015416023	Block Group 3, Census Tract 5416.02, Harris County, Texas	51.6%
482015416024	Block Group 4, Census Tract 5416.02, Harris County, Texas	43.3%
482015417001	Block Group 1, Census Tract 5417, Harris County, Texas	43.2%
482015417002	Block Group 2, Census Tract 5417, Harris County, Texas	47.6%
482015417003	Block Group 3, Census Tract 5417, Harris County, Texas	37.8%
482015418001	Block Group 1, Census Tract 5418, Harris County, Texas	42.7%
482015418002	Block Group 2, Census Tract 5418, Harris County, Texas	45.8%
482015419001	Block Group 1, Census Tract 5419, Harris County, Texas	50.6%
482015419002	Block Group 2, Census Tract 5419, Harris County, Texas	16.3%
482015420001	Block Group 1, Census Tract 5420, Harris County, Texas	36.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015420002	Block Group 2, Census Tract 5420, Harris County, Texas	27.0%
482015420003	Block Group 3, Census Tract 5420, Harris County, Texas	40.9%
482015420004	Block Group 4, Census Tract 5420, Harris County, Texas	44.9%
482015421011	Block Group 1, Census Tract 5421.01, Harris County, Texas	37.1%
482015421012	Block Group 2, Census Tract 5421.01, Harris County, Texas	23.1%
482015421021	Block Group 1, Census Tract 5421.02, Harris County, Texas	26.0%
482015421022	Block Group 2, Census Tract 5421.02, Harris County, Texas	39.3%
482015422001	Block Group 1, Census Tract 5422, Harris County, Texas	50.4%
482015422002	Block Group 2, Census Tract 5422, Harris County, Texas	47.7%
482015423011	Block Group 1, Census Tract 5423.01, Harris County, Texas	13.9%
482015423012	Block Group 2, Census Tract 5423.01, Harris County, Texas	41.9%
482015423013	Block Group 3, Census Tract 5423.01, Harris County, Texas	10.5%
482015423014	Block Group 4, Census Tract 5423.01, Harris County, Texas	5.4%
482015423021	Block Group 1, Census Tract 5423.02, Harris County, Texas	35.5%
482015424001	Block Group 1, Census Tract 5424, Harris County, Texas	36.3%
482015424002	Block Group 2, Census Tract 5424, Harris County, Texas	48.2%
482015424003	Block Group 3, Census Tract 5424, Harris County, Texas	67.7%
482015425001	Block Group 1, Census Tract 5425, Harris County, Texas	13.7%
482015426001	Block Group 1, Census Tract 5426, Harris County, Texas	25.0%
482015427001	Block Group 1, Census Tract 5427, Harris County, Texas	36.8%
482015427002	Block Group 2, Census Tract 5427, Harris County, Texas	27.4%
482015428001	Block Group 1, Census Tract 5428, Harris County, Texas	14.7%
482015428002	Block Group 2, Census Tract 5428, Harris County, Texas	20.4%
482015428003	Block Group 3, Census Tract 5428, Harris County, Texas	54.2%
482015429001	Block Group 1, Census Tract 5429, Harris County, Texas	46.4%
482015429002	Block Group 2, Census Tract 5429, Harris County, Texas	11.1%
482015429003	Block Group 3, Census Tract 5429, Harris County, Texas	20.3%
482015430011	Block Group 1, Census Tract 5430.01, Harris County, Texas	14.2%
482015430012	Block Group 2, Census Tract 5430.01, Harris County, Texas	40.3%
482015430021	Block Group 1, Census Tract 5430.02, Harris County, Texas	7.0%
482015430022	Block Group 2, Census Tract 5430.02, Harris County, Texas	29.3%
482015430031	Block Group 1, Census Tract 5430.03, Harris County, Texas	42.9%
482015431001	Block Group 1, Census Tract 5431, Harris County, Texas	34.6%
482015432001	Block Group 1, Census Tract 5432, Harris County, Texas	47.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015432002	Block Group 2, Census Tract 5432, Harris County, Texas	33.4%
482015432003	Block Group 3, Census Tract 5432, Harris County, Texas	64.2%
482015501001	Block Group 1, Census Tract 5501, Harris County, Texas	91.6%
482015501002	Block Group 2, Census Tract 5501, Harris County, Texas	88.6%
482015502001	Block Group 1, Census Tract 5502, Harris County, Texas	89.7%
482015502002	Block Group 2, Census Tract 5502, Harris County, Texas	93.4%
482015503011	Block Group 1, Census Tract 5503.01, Harris County, Texas	63.3%
482015503012	Block Group 2, Census Tract 5503.01, Harris County, Texas	79.8%
482015503013	Block Group 3, Census Tract 5503.01, Harris County, Texas	76.0%
482015503021	Block Group 1, Census Tract 5503.02, Harris County, Texas	24.5%
482015503022	Block Group 2, Census Tract 5503.02, Harris County, Texas	40.4%
482015503023	Block Group 3, Census Tract 5503.02, Harris County, Texas	61.5%
482015503024	Block Group 4, Census Tract 5503.02, Harris County, Texas	41.2%
482015504011	Block Group 1, Census Tract 5504.01, Harris County, Texas	65.2%
482015504012	Block Group 2, Census Tract 5504.01, Harris County, Texas	51.8%
482015504013	Block Group 3, Census Tract 5504.01, Harris County, Texas	60.4%
482015504014	Block Group 4, Census Tract 5504.01, Harris County, Texas	47.3%
482015504021	Block Group 1, Census Tract 5504.02, Harris County, Texas	41.8%
482015504022	Block Group 2, Census Tract 5504.02, Harris County, Texas	74.2%
482015504023	Block Group 3, Census Tract 5504.02, Harris County, Texas	19.5%
482015505001	Block Group 1, Census Tract 5505, Harris County, Texas	56.0%
482015505002	Block Group 2, Census Tract 5505, Harris County, Texas	52.3%
482015506011	Block Group 1, Census Tract 5506.01, Harris County, Texas	51.2%
482015506012	Block Group 2, Census Tract 5506.01, Harris County, Texas	55.1%
482015506021	Block Group 1, Census Tract 5506.02, Harris County, Texas	43.0%
482015506022	Block Group 2, Census Tract 5506.02, Harris County, Texas	45.7%
482015506031	Block Group 1, Census Tract 5506.03, Harris County, Texas	69.3%
482015506032	Block Group 2, Census Tract 5506.03, Harris County, Texas	79.6%
482015506033	Block Group 3, Census Tract 5506.03, Harris County, Texas	41.3%
482015507001	Block Group 1, Census Tract 5507, Harris County, Texas	21.3%
482015507002	Block Group 2, Census Tract 5507, Harris County, Texas	40.2%
482015508001	Block Group 1, Census Tract 5508, Harris County, Texas	23.6%
482015508002	Block Group 2, Census Tract 5508, Harris County, Texas	45.8%
482015509001	Block Group 1, Census Tract 5509, Harris County, Texas	21.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015509002	Block Group 2, Census Tract 5509, Harris County, Texas	54.5%
482015509003	Block Group 3, Census Tract 5509, Harris County, Texas	62.8%
482015509004	Block Group 4, Census Tract 5509, Harris County, Texas	29.8%
482015510001	Block Group 1, Census Tract 5510, Harris County, Texas	66.5%
482015511001	Block Group 1, Census Tract 5511, Harris County, Texas	73.6%
482015511002	Block Group 2, Census Tract 5511, Harris County, Texas	73.4%
482015511003	Block Group 3, Census Tract 5511, Harris County, Texas	41.3%
482015511004	Block Group 4, Census Tract 5511, Harris County, Texas	14.0%
482015511005	Block Group 5, Census Tract 5511, Harris County, Texas	26.0%
482015512001	Block Group 1, Census Tract 5512, Harris County, Texas	47.4%
482015512002	Block Group 2, Census Tract 5512, Harris County, Texas	16.1%
482015512003	Block Group 3, Census Tract 5512, Harris County, Texas	9.8%
482015512004	Block Group 4, Census Tract 5512, Harris County, Texas	64.4%
482015513001	Block Group 1, Census Tract 5513, Harris County, Texas	20.3%
482015513002	Block Group 2, Census Tract 5513, Harris County, Texas	21.5%
482015514001	Block Group 1, Census Tract 5514, Harris County, Texas	22.7%
482015514002	Block Group 2, Census Tract 5514, Harris County, Texas	23.2%
482015514003	Block Group 3, Census Tract 5514, Harris County, Texas	38.7%
482015515001	Block Group 1, Census Tract 5515, Harris County, Texas	50.9%
482015515002	Block Group 2, Census Tract 5515, Harris County, Texas	53.4%
482015516001	Block Group 1, Census Tract 5516, Harris County, Texas	63.0%
482015516002	Block Group 2, Census Tract 5516, Harris County, Texas	50.4%
482015516003	Block Group 3, Census Tract 5516, Harris County, Texas	39.3%
482015517011	Block Group 1, Census Tract 5517.01, Harris County, Texas	20.6%
482015517012	Block Group 2, Census Tract 5517.01, Harris County, Texas	33.9%
482015517013	Block Group 3, Census Tract 5517.01, Harris County, Texas	20.8%
482015517014	Block Group 4, Census Tract 5517.01, Harris County, Texas	34.7%
482015517015	Block Group 5, Census Tract 5517.01, Harris County, Texas	3.0%
482015517016	Block Group 6, Census Tract 5517.01, Harris County, Texas	17.9%
482015517021	Block Group 1, Census Tract 5517.02, Harris County, Texas	12.5%
482015517022	Block Group 2, Census Tract 5517.02, Harris County, Texas	6.9%
482015517031	Block Group 1, Census Tract 5517.03, Harris County, Texas	11.1%
482015517032	Block Group 2, Census Tract 5517.03, Harris County, Texas	23.2%
482015517033	Block Group 3, Census Tract 5517.03, Harris County, Texas	10.2%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015518001	Block Group 1, Census Tract 5518, Harris County, Texas	14.8%
482015518002	Block Group 2, Census Tract 5518, Harris County, Texas	11.8%
482015518003	Block Group 3, Census Tract 5518, Harris County, Texas	30.7%
482015519001	Block Group 1, Census Tract 5519, Harris County, Texas	34.5%
482015519002	Block Group 2, Census Tract 5519, Harris County, Texas	46.0%
482015519003	Block Group 3, Census Tract 5519, Harris County, Texas	47.6%
482015520011	Block Group 1, Census Tract 5520.01, Harris County, Texas	32.6%
482015520012	Block Group 2, Census Tract 5520.01, Harris County, Texas	45.1%
482015520013	Block Group 3, Census Tract 5520.01, Harris County, Texas	45.8%
482015520021	Block Group 1, Census Tract 5520.02, Harris County, Texas	14.3%
482015521011	Block Group 1, Census Tract 5521.01, Harris County, Texas	31.1%
482015521021	Block Group 1, Census Tract 5521.02, Harris County, Texas	7.2%
482015521022	Block Group 2, Census Tract 5521.02, Harris County, Texas	5.4%
482015521023	Block Group 3, Census Tract 5521.02, Harris County, Texas	57.6%
482015521031	Block Group 1, Census Tract 5521.03, Harris County, Texas	28.7%
482015521032	Block Group 2, Census Tract 5521.03, Harris County, Texas	32.6%
482015522001	Block Group 1, Census Tract 5522, Harris County, Texas	24.2%
482015522002	Block Group 2, Census Tract 5522, Harris County, Texas	41.3%
482015522003	Block Group 3, Census Tract 5522, Harris County, Texas	42.9%
482015523011	Block Group 1, Census Tract 5523.01, Harris County, Texas	27.2%
482015523012	Block Group 2, Census Tract 5523.01, Harris County, Texas	20.0%
482015523021	Block Group 1, Census Tract 5523.02, Harris County, Texas	27.5%
482015523022	Block Group 2, Census Tract 5523.02, Harris County, Texas	43.5%
482015524001	Block Group 1, Census Tract 5524, Harris County, Texas	51.5%
482015524002	Block Group 2, Census Tract 5524, Harris County, Texas	17.3%
482015524003	Block Group 3, Census Tract 5524, Harris County, Texas	68.4%
482015525001	Block Group 1, Census Tract 5525, Harris County, Texas	36.3%
482015525002	Block Group 2, Census Tract 5525, Harris County, Texas	32.1%
482015525003	Block Group 3, Census Tract 5525, Harris County, Texas	7.6%
482015526011	Block Group 1, Census Tract 5526.01, Harris County, Texas	60.9%
482015526021	Block Group 1, Census Tract 5526.02, Harris County, Texas	22.9%
482015526022	Block Group 2, Census Tract 5526.02, Harris County, Texas	16.6%
482015527001	Block Group 1, Census Tract 5527, Harris County, Texas	43.4%
482015527002	Block Group 2, Census Tract 5527, Harris County, Texas	48.2%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015527003	Block Group 3, Census Tract 5527, Harris County, Texas	13.2%
482015528001	Block Group 1, Census Tract 5528, Harris County, Texas	9.8%
482015528002	Block Group 2, Census Tract 5528, Harris County, Texas	27.0%
482015528003	Block Group 3, Census Tract 5528, Harris County, Texas	25.2%
482015528004	Block Group 4, Census Tract 5528, Harris County, Texas	19.6%
482015528005	Block Group 5, Census Tract 5528, Harris County, Texas	14.7%
482015529001	Block Group 1, Census Tract 5529, Harris County, Texas	0.9%
482015529002	Block Group 2, Census Tract 5529, Harris County, Texas	32.5%
482015529003	Block Group 3, Census Tract 5529, Harris County, Texas	50.6%
482015529004	Block Group 4, Census Tract 5529, Harris County, Texas	36.6%
482015529005	Block Group 5, Census Tract 5529, Harris County, Texas	4.0%
482015530011	Block Group 1, Census Tract 5530.01, Harris County, Texas	9.5%
482015530012	Block Group 2, Census Tract 5530.01, Harris County, Texas	1.7%
482015530013	Block Group 3, Census Tract 5530.01, Harris County, Texas	38.3%
482015530021	Block Group 1, Census Tract 5530.02, Harris County, Texas	78.0%
482015530022	Block Group 2, Census Tract 5530.02, Harris County, Texas	13.0%
482015531001	Block Group 1, Census Tract 5531, Harris County, Texas	20.5%
482015531002	Block Group 2, Census Tract 5531, Harris County, Texas	40.4%
482015531003	Block Group 3, Census Tract 5531, Harris County, Texas	35.9%
482015531004	Block Group 4, Census Tract 5531, Harris County, Texas	52.4%
482015532001	Block Group 1, Census Tract 5532, Harris County, Texas	24.2%
482015532002	Block Group 2, Census Tract 5532, Harris County, Texas	72.3%
482015532003	Block Group 3, Census Tract 5532, Harris County, Texas	81.0%
482015532004	Block Group 4, Census Tract 5532, Harris County, Texas	83.1%
482015533001	Block Group 1, Census Tract 5533, Harris County, Texas	73.8%
482015533002	Block Group 2, Census Tract 5533, Harris County, Texas	52.5%
482015534011	Block Group 1, Census Tract 5534.01, Harris County, Texas	19.4%
482015534012	Block Group 2, Census Tract 5534.01, Harris County, Texas	20.8%
482015534021	Block Group 1, Census Tract 5534.02, Harris County, Texas	38.4%
482015534022	Block Group 2, Census Tract 5534.02, Harris County, Texas	9.5%
482015534023	Block Group 3, Census Tract 5534.02, Harris County, Texas	27.2%
482015534024	Block Group 4, Census Tract 5534.02, Harris County, Texas	5.0%
482015534031	Block Group 1, Census Tract 5534.03, Harris County, Texas	14.8%
482015535001	Block Group 1, Census Tract 5535, Harris County, Texas	34.5%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015535002	Block Group 2, Census Tract 5535, Harris County, Texas	19.7%
482015535003	Block Group 3, Census Tract 5535, Harris County, Texas	13.3%
482015536001	Block Group 1, Census Tract 5536, Harris County, Texas	50.1%
482015536002	Block Group 2, Census Tract 5536, Harris County, Texas	10.1%
482015537001	Block Group 1, Census Tract 5537, Harris County, Texas	11.8%
482015537002	Block Group 2, Census Tract 5537, Harris County, Texas	15.4%
482015538011	Block Group 1, Census Tract 5538.01, Harris County, Texas	14.6%
482015538021	Block Group 1, Census Tract 5538.02, Harris County, Texas	21.5%
482015538022	Block Group 2, Census Tract 5538.02, Harris County, Texas	5.3%
482015538023	Block Group 3, Census Tract 5538.02, Harris County, Texas	14.0%
482015538024	Block Group 4, Census Tract 5538.02, Harris County, Texas	45.1%
482015539001	Block Group 1, Census Tract 5539, Harris County, Texas	13.6%
482015539002	Block Group 2, Census Tract 5539, Harris County, Texas	16.0%
482015539003	Block Group 3, Census Tract 5539, Harris County, Texas	7.7%
482015539004	Block Group 4, Census Tract 5539, Harris County, Texas	15.2%
482015540011	Block Group 1, Census Tract 5540.01, Harris County, Texas	65.5%
482015540012	Block Group 2, Census Tract 5540.01, Harris County, Texas	16.8%
482015540021	Block Group 1, Census Tract 5540.02, Harris County, Texas	10.7%
482015540022	Block Group 2, Census Tract 5540.02, Harris County, Texas	4.3%
482015541011	Block Group 1, Census Tract 5541.01, Harris County, Texas	16.9%
482015541021	Block Group 1, Census Tract 5541.02, Harris County, Texas	37.0%
482015541022	Block Group 2, Census Tract 5541.02, Harris County, Texas	20.9%
482015541023	Block Group 3, Census Tract 5541.02, Harris County, Texas	20.0%
482015542001	Block Group 1, Census Tract 5542, Harris County, Texas	27.7%
482015542002	Block Group 2, Census Tract 5542, Harris County, Texas	32.4%
482015542003	Block Group 3, Census Tract 5542, Harris County, Texas	45.5%
482015543011	Block Group 1, Census Tract 5543.01, Harris County, Texas	2.2%
482015543012	Block Group 2, Census Tract 5543.01, Harris County, Texas	3.3%
482015543013	Block Group 3, Census Tract 5543.01, Harris County, Texas	9.7%
482015543014	Block Group 4, Census Tract 5543.01, Harris County, Texas	7.1%
482015543021	Block Group 1, Census Tract 5543.02, Harris County, Texas	41.9%
482015543022	Block Group 2, Census Tract 5543.02, Harris County, Texas	22.0%
482015544011	Block Group 1, Census Tract 5544.01, Harris County, Texas	5.5%
482015544012	Block Group 2, Census Tract 5544.01, Harris County, Texas	9.8%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015544021	Block Group 1, Census Tract 5544.02, Harris County, Texas	5.3%
482015544022	Block Group 2, Census Tract 5544.02, Harris County, Texas	16.3%
482015544031	Block Group 1, Census Tract 5544.03, Harris County, Texas	15.7%
482015545011	Block Group 1, Census Tract 5545.01, Harris County, Texas	12.6%
482015545012	Block Group 2, Census Tract 5545.01, Harris County, Texas	27.5%
482015545021	Block Group 1, Census Tract 5545.02, Harris County, Texas	0.0%
482015545022	Block Group 2, Census Tract 5545.02, Harris County, Texas	8.7%
482015545023	Block Group 3, Census Tract 5545.02, Harris County, Texas	1.5%
482015546001	Block Group 1, Census Tract 5546, Harris County, Texas	8.4%
482015546002	Block Group 2, Census Tract 5546, Harris County, Texas	4.0%
482015547001	Block Group 1, Census Tract 5547, Harris County, Texas	33.7%
482015547002	Block Group 2, Census Tract 5547, Harris County, Texas	8.7%
482015548011	Block Group 1, Census Tract 5548.01, Harris County, Texas	30.1%
482015548021	Block Group 1, Census Tract 5548.02, Harris County, Texas	17.1%
482015548022	Block Group 2, Census Tract 5548.02, Harris County, Texas	15.4%
482015549011	Block Group 1, Census Tract 5549.01, Harris County, Texas	33.8%
482015549012	Block Group 2, Census Tract 5549.01, Harris County, Texas	32.8%
482015549021	Block Group 1, Census Tract 5549.02, Harris County, Texas	10.9%
482015549022	Block Group 2, Census Tract 5549.02, Harris County, Texas	0.2%
482015549031	Block Group 1, Census Tract 5549.03, Harris County, Texas	5.9%
482015550001	Block Group 1, Census Tract 5550, Harris County, Texas	21.4%
482015550002	Block Group 2, Census Tract 5550, Harris County, Texas	10.9%
482015550003	Block Group 3, Census Tract 5550, Harris County, Texas	23.6%
482015551001	Block Group 1, Census Tract 5551, Harris County, Texas	21.6%
482015551002	Block Group 2, Census Tract 5551, Harris County, Texas	21.7%
482015551003	Block Group 3, Census Tract 5551, Harris County, Texas	24.8%
482015552001	Block Group 1, Census Tract 5552, Harris County, Texas	48.2%
482015552002	Block Group 2, Census Tract 5552, Harris County, Texas	31.2%
482015553011	Block Group 1, Census Tract 5553.01, Harris County, Texas	5.0%
482015553021	Block Group 1, Census Tract 5553.02, Harris County, Texas	12.3%
482015553022	Block Group 2, Census Tract 5553.02, Harris County, Texas	20.8%
482015553031	Block Group 1, Census Tract 5553.03, Harris County, Texas	25.2%
482015554011	Block Group 1, Census Tract 5554.01, Harris County, Texas	42.3%
482015554021	Block Group 1, Census Tract 5554.02, Harris County, Texas	42.5%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482015554022	Block Group 2, Census Tract 5554.02, Harris County, Texas	70.6%
482015554023	Block Group 3, Census Tract 5554.02, Harris County, Texas	20.2%
482015554024	Block Group 4, Census Tract 5554.02, Harris County, Texas	57.5%
482015555011	Block Group 1, Census Tract 5555.01, Harris County, Texas	38.4%
482015555012	Block Group 2, Census Tract 5555.01, Harris County, Texas	26.8%
482015555021	Block Group 1, Census Tract 5555.02, Harris County, Texas	24.5%
482015555022	Block Group 2, Census Tract 5555.02, Harris County, Texas	16.2%
482015556001	Block Group 1, Census Tract 5556, Harris County, Texas	33.4%
482015556002	Block Group 2, Census Tract 5556, Harris County, Texas	14.6%
482015557011	Block Group 1, Census Tract 5557.01, Harris County, Texas	14.6%
482015557012	Block Group 2, Census Tract 5557.01, Harris County, Texas	9.5%
482015557021	Block Group 1, Census Tract 5557.02, Harris County, Texas	7.5%
482015560001	Block Group 1, Census Tract 5560, Harris County, Texas	36.5%
482015560002	Block Group 2, Census Tract 5560, Harris County, Texas	34.4%
482015560003	Block Group 3, Census Tract 5560, Harris County, Texas	54.1%
482019800001	Block Group 1, Census Tract 9800, Harris County, Texas	50.0%
482019801001	Block Group 1, Census Tract 9801, Harris County, Texas	100.0%
482399501001	Block Group 1, Census Tract 9501, Jackson County, Texas	34.3%
482399501002	Block Group 2, Census Tract 9501, Jackson County, Texas	44.0%
482399501003	Block Group 3, Census Tract 9501, Jackson County, Texas	43.0%
482399501004	Block Group 4, Census Tract 9501, Jackson County, Texas	21.4%
482399502001	Block Group 1, Census Tract 9502, Jackson County, Texas	45.8%
482399502002	Block Group 2, Census Tract 9502, Jackson County, Texas	46.3%
482399502003	Block Group 3, Census Tract 9502, Jackson County, Texas	28.5%
482399503001	Block Group 1, Census Tract 9503, Jackson County, Texas	48.1%
482399503002	Block Group 2, Census Tract 9503, Jackson County, Texas	29.1%
482399503003	Block Group 3, Census Tract 9503, Jackson County, Texas	36.4%
482399503004	Block Group 4, Census Tract 9503, Jackson County, Texas	43.1%
482419501001	Block Group 1, Census Tract 9501, Jasper County, Texas	41.2%
482419501002	Block Group 2, Census Tract 9501, Jasper County, Texas	32.9%
482419501003	Block Group 3, Census Tract 9501, Jasper County, Texas	38.5%
482419501004	Block Group 4, Census Tract 9501, Jasper County, Texas	44.2%
482419502001	Block Group 1, Census Tract 9502, Jasper County, Texas	88.4%
482419502002	Block Group 2, Census Tract 9502, Jasper County, Texas	23.5%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482419502003	Block Group 3, Census Tract 9502, Jasper County, Texas	60.2%
482419502004	Block Group 4, Census Tract 9502, Jasper County, Texas	50.8%
482419503001	Block Group 1, Census Tract 9503, Jasper County, Texas	75.4%
482419503002	Block Group 2, Census Tract 9503, Jasper County, Texas	62.7%
482419503003	Block Group 3, Census Tract 9503, Jasper County, Texas	53.1%
482419504001	Block Group 1, Census Tract 9504, Jasper County, Texas	44.4%
482419504002	Block Group 2, Census Tract 9504, Jasper County, Texas	28.8%
482419504003	Block Group 3, Census Tract 9504, Jasper County, Texas	25.6%
482419505001	Block Group 1, Census Tract 9505, Jasper County, Texas	42.5%
482419505002	Block Group 2, Census Tract 9505, Jasper County, Texas	55.2%
482419505003	Block Group 3, Census Tract 9505, Jasper County, Texas	43.5%
482419505004	Block Group 4, Census Tract 9505, Jasper County, Texas	30.4%
482419506001	Block Group 1, Census Tract 9506, Jasper County, Texas	29.2%
482419506002	Block Group 2, Census Tract 9506, Jasper County, Texas	65.3%
482419507001	Block Group 1, Census Tract 9507, Jasper County, Texas	42.3%
482419507002	Block Group 2, Census Tract 9507, Jasper County, Texas	18.9%
482419507003	Block Group 3, Census Tract 9507, Jasper County, Texas	24.7%
482419507004	Block Group 4, Census Tract 9507, Jasper County, Texas	21.2%
482419507005	Block Group 5, Census Tract 9507, Jasper County, Texas	34.1%
482419508001	Block Group 1, Census Tract 9508, Jasper County, Texas	28.9%
482419508002	Block Group 2, Census Tract 9508, Jasper County, Texas	42.4%
482450001011	Block Group 1, Census Tract 1.01, Jefferson County, Texas	46.2%
482450001012	Block Group 2, Census Tract 1.01, Jefferson County, Texas	23.2%
482450001021	Block Group 1, Census Tract 1.02, Jefferson County, Texas	34.9%
482450001031	Block Group 1, Census Tract 1.03, Jefferson County, Texas	65.9%
482450001032	Block Group 2, Census Tract 1.03, Jefferson County, Texas	84.5%
482450002001	Block Group 1, Census Tract 2, Jefferson County, Texas	21.3%
482450002002	Block Group 2, Census Tract 2, Jefferson County, Texas	40.1%
482450002003	Block Group 3, Census Tract 2, Jefferson County, Texas	55.8%
482450003021	Block Group 1, Census Tract 3.02, Jefferson County, Texas	22.4%
482450003022	Block Group 2, Census Tract 3.02, Jefferson County, Texas	12.8%
482450003023	Block Group 3, Census Tract 3.02, Jefferson County, Texas	13.9%
482450003041	Block Group 1, Census Tract 3.04, Jefferson County, Texas	30.8%
482450003042	Block Group 2, Census Tract 3.04, Jefferson County, Texas	30.8%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482450003043	Block Group 3, Census Tract 3.04, Jefferson County, Texas	36.9%
482450003044	Block Group 4, Census Tract 3.04, Jefferson County, Texas	23.0%
482450003045	Block Group 5, Census Tract 3.04, Jefferson County, Texas	14.8%
482450003061	Block Group 1, Census Tract 3.06, Jefferson County, Texas	7.9%
482450003062	Block Group 2, Census Tract 3.06, Jefferson County, Texas	21.9%
482450003063	Block Group 3, Census Tract 3.06, Jefferson County, Texas	37.7%
482450003064	Block Group 4, Census Tract 3.06, Jefferson County, Texas	7.5%
482450003071	Block Group 1, Census Tract 3.07, Jefferson County, Texas	24.5%
482450003081	Block Group 1, Census Tract 3.08, Jefferson County, Texas	20.6%
482450003082	Block Group 2, Census Tract 3.08, Jefferson County, Texas	47.6%
482450003083	Block Group 3, Census Tract 3.08, Jefferson County, Texas	68.5%
482450003091	Block Group 1, Census Tract 3.09, Jefferson County, Texas	35.4%
482450003101	Block Group 1, Census Tract 3.10, Jefferson County, Texas	14.3%
482450003102	Block Group 2, Census Tract 3.10, Jefferson County, Texas	31.4%
482450003103	Block Group 3, Census Tract 3.10, Jefferson County, Texas	47.1%
482450003104	Block Group 4, Census Tract 3.10, Jefferson County, Texas	4.4%
482450003105	Block Group 5, Census Tract 3.10, Jefferson County, Texas	9.8%
482450004001	Block Group 1, Census Tract 4, Jefferson County, Texas	73.2%
482450004002	Block Group 2, Census Tract 4, Jefferson County, Texas	85.5%
482450004003	Block Group 3, Census Tract 4, Jefferson County, Texas	13.8%
482450004004	Block Group 4, Census Tract 4, Jefferson County, Texas	22.9%
482450005001	Block Group 1, Census Tract 5, Jefferson County, Texas	40.1%
482450005002	Block Group 2, Census Tract 5, Jefferson County, Texas	47.4%
482450006001	Block Group 1, Census Tract 6, Jefferson County, Texas	35.5%
482450006002	Block Group 2, Census Tract 6, Jefferson County, Texas	87.6%
482450006003	Block Group 3, Census Tract 6, Jefferson County, Texas	77.3%
482450006004	Block Group 4, Census Tract 6, Jefferson County, Texas	57.5%
482450006005	Block Group 5, Census Tract 6, Jefferson County, Texas	48.5%
482450006006	Block Group 6, Census Tract 6, Jefferson County, Texas	67.5%
482450007001	Block Group 1, Census Tract 7, Jefferson County, Texas	55.3%
482450007002	Block Group 2, Census Tract 7, Jefferson County, Texas	100.0%
482450007003	Block Group 3, Census Tract 7, Jefferson County, Texas	85.9%
482450007004	Block Group 4, Census Tract 7, Jefferson County, Texas	89.2%
482450009001	Block Group 1, Census Tract 9, Jefferson County, Texas	53.1%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482450009002	Block Group 2, Census Tract 9, Jefferson County, Texas	67.2%
482450011001	Block Group 1, Census Tract 11, Jefferson County, Texas	61.4%
482450011002	Block Group 2, Census Tract 11, Jefferson County, Texas	58.2%
482450011003	Block Group 3, Census Tract 11, Jefferson County, Texas	35.1%
482450012001	Block Group 1, Census Tract 12, Jefferson County, Texas	57.0%
482450012002	Block Group 2, Census Tract 12, Jefferson County, Texas	70.4%
482450013011	Block Group 1, Census Tract 13.01, Jefferson County, Texas	39.6%
482450013012	Block Group 2, Census Tract 13.01, Jefferson County, Texas	37.1%
482450013013	Block Group 3, Census Tract 13.01, Jefferson County, Texas	18.6%
482450013014	Block Group 4, Census Tract 13.01, Jefferson County, Texas	18.0%
482450013021	Block Group 1, Census Tract 13.02, Jefferson County, Texas	55.6%
482450013022	Block Group 2, Census Tract 13.02, Jefferson County, Texas	17.6%
482450013031	Block Group 1, Census Tract 13.03, Jefferson County, Texas	12.3%
482450013032	Block Group 2, Census Tract 13.03, Jefferson County, Texas	32.1%
482450017001	Block Group 1, Census Tract 17, Jefferson County, Texas	58.7%
482450017002	Block Group 2, Census Tract 17, Jefferson County, Texas	70.3%
482450017003	Block Group 3, Census Tract 17, Jefferson County, Texas	85.4%
482450019001	Block Group 1, Census Tract 19, Jefferson County, Texas	63.0%
482450019002	Block Group 2, Census Tract 19, Jefferson County, Texas	81.5%
482450019003	Block Group 3, Census Tract 19, Jefferson County, Texas	64.8%
482450020001	Block Group 1, Census Tract 20, Jefferson County, Texas	38.1%
482450020002	Block Group 2, Census Tract 20, Jefferson County, Texas	50.4%
482450021001	Block Group 1, Census Tract 21, Jefferson County, Texas	79.4%
482450021002	Block Group 2, Census Tract 21, Jefferson County, Texas	52.8%
482450021003	Block Group 3, Census Tract 21, Jefferson County, Texas	56.5%
482450022001	Block Group 1, Census Tract 22, Jefferson County, Texas	63.5%
482450022002	Block Group 2, Census Tract 22, Jefferson County, Texas	47.8%
482450022003	Block Group 3, Census Tract 22, Jefferson County, Texas	47.1%
482450023001	Block Group 1, Census Tract 23, Jefferson County, Texas	86.7%
482450023002	Block Group 2, Census Tract 23, Jefferson County, Texas	82.4%
482450023003	Block Group 3, Census Tract 23, Jefferson County, Texas	30.0%
482450023004	Block Group 4, Census Tract 23, Jefferson County, Texas	72.0%
482450023005	Block Group 5, Census Tract 23, Jefferson County, Texas	52.1%
482450024001	Block Group 1, Census Tract 24, Jefferson County, Texas	95.9%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482450024002	Block Group 2, Census Tract 24, Jefferson County, Texas	72.1%
482450024003	Block Group 3, Census Tract 24, Jefferson County, Texas	65.8%
482450024004	Block Group 4, Census Tract 24, Jefferson County, Texas	41.0%
482450025001	Block Group 1, Census Tract 25, Jefferson County, Texas	59.9%
482450025002	Block Group 2, Census Tract 25, Jefferson County, Texas	59.1%
482450026001	Block Group 1, Census Tract 26, Jefferson County, Texas	74.8%
482450026002	Block Group 2, Census Tract 26, Jefferson County, Texas	96.5%
482450026003	Block Group 3, Census Tract 26, Jefferson County, Texas	83.1%
482450026004	Block Group 4, Census Tract 26, Jefferson County, Texas	64.9%
482450026005	Block Group 5, Census Tract 26, Jefferson County, Texas	67.5%
482450051001	Block Group 1, Census Tract 51, Jefferson County, Texas	75.0%
482450051002	Block Group 2, Census Tract 51, Jefferson County, Texas	72.7%
482450054001	Block Group 1, Census Tract 54, Jefferson County, Texas	77.4%
482450054002	Block Group 2, Census Tract 54, Jefferson County, Texas	51.8%
482450055001	Block Group 1, Census Tract 55, Jefferson County, Texas	64.9%
482450055002	Block Group 2, Census Tract 55, Jefferson County, Texas	40.9%
482450055003	Block Group 3, Census Tract 55, Jefferson County, Texas	36.7%
482450055004	Block Group 4, Census Tract 55, Jefferson County, Texas	75.3%
482450056001	Block Group 1, Census Tract 56, Jefferson County, Texas	50.8%
482450056002	Block Group 2, Census Tract 56, Jefferson County, Texas	65.5%
482450056003	Block Group 3, Census Tract 56, Jefferson County, Texas	53.6%
482450056004	Block Group 4, Census Tract 56, Jefferson County, Texas	86.7%
482450059001	Block Group 1, Census Tract 59, Jefferson County, Texas	50.3%
482450059002	Block Group 2, Census Tract 59, Jefferson County, Texas	78.7%
482450061001	Block Group 1, Census Tract 61, Jefferson County, Texas	64.5%
482450061002	Block Group 2, Census Tract 61, Jefferson County, Texas	56.5%
482450061003	Block Group 3, Census Tract 61, Jefferson County, Texas	59.5%
482450063001	Block Group 1, Census Tract 63, Jefferson County, Texas	72.7%
482450063002	Block Group 2, Census Tract 63, Jefferson County, Texas	50.9%
482450064001	Block Group 1, Census Tract 64, Jefferson County, Texas	59.1%
482450064002	Block Group 2, Census Tract 64, Jefferson County, Texas	49.6%
482450065001	Block Group 1, Census Tract 65, Jefferson County, Texas	57.8%
482450065002	Block Group 2, Census Tract 65, Jefferson County, Texas	52.3%
482450065003	Block Group 3, Census Tract 65, Jefferson County, Texas	82.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482450065004	Block Group 4, Census Tract 65, Jefferson County, Texas	46.4%
482450066001	Block Group 1, Census Tract 66, Jefferson County, Texas	26.7%
482450066002	Block Group 2, Census Tract 66, Jefferson County, Texas	55.8%
482450066003	Block Group 3, Census Tract 66, Jefferson County, Texas	58.7%
482450067001	Block Group 1, Census Tract 67, Jefferson County, Texas	60.1%
482450067002	Block Group 2, Census Tract 67, Jefferson County, Texas	49.4%
482450068001	Block Group 1, Census Tract 68, Jefferson County, Texas	54.8%
482450068002	Block Group 2, Census Tract 68, Jefferson County, Texas	56.4%
482450069001	Block Group 1, Census Tract 69, Jefferson County, Texas	18.3%
482450069002	Block Group 2, Census Tract 69, Jefferson County, Texas	37.5%
482450069003	Block Group 3, Census Tract 69, Jefferson County, Texas	43.0%
482450070011	Block Group 1, Census Tract 70.01, Jefferson County, Texas	56.5%
482450070012	Block Group 2, Census Tract 70.01, Jefferson County, Texas	5.6%
482450070013	Block Group 3, Census Tract 70.01, Jefferson County, Texas	70.6%
482450070021	Block Group 1, Census Tract 70.02, Jefferson County, Texas	24.8%
482450070022	Block Group 2, Census Tract 70.02, Jefferson County, Texas	51.6%
482450071001	Block Group 1, Census Tract 71, Jefferson County, Texas	45.9%
482450071002	Block Group 2, Census Tract 71, Jefferson County, Texas	29.0%
482450071003	Block Group 3, Census Tract 71, Jefferson County, Texas	33.8%
482450101001	Block Group 1, Census Tract 101, Jefferson County, Texas	51.0%
482450101002	Block Group 2, Census Tract 101, Jefferson County, Texas	69.1%
482450101003	Block Group 3, Census Tract 101, Jefferson County, Texas	72.7%
482450102001	Block Group 1, Census Tract 102, Jefferson County, Texas	23.2%
482450102002	Block Group 2, Census Tract 102, Jefferson County, Texas	36.6%
482450103001	Block Group 1, Census Tract 103, Jefferson County, Texas	43.1%
482450103002	Block Group 2, Census Tract 103, Jefferson County, Texas	46.3%
482450104001	Block Group 1, Census Tract 104, Jefferson County, Texas	40.7%
482450104002	Block Group 2, Census Tract 104, Jefferson County, Texas	41.0%
482450104003	Block Group 3, Census Tract 104, Jefferson County, Texas	16.3%
482450105001	Block Group 1, Census Tract 105, Jefferson County, Texas	30.9%
482450105002	Block Group 2, Census Tract 105, Jefferson County, Texas	63.6%
482450105003	Block Group 3, Census Tract 105, Jefferson County, Texas	25.9%
482450105004	Block Group 4, Census Tract 105, Jefferson County, Texas	39.0%
482450106001	Block Group 1, Census Tract 106, Jefferson County, Texas	28.5%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482450106002	Block Group 2, Census Tract 106, Jefferson County, Texas	64.9%
482450106003	Block Group 3, Census Tract 106, Jefferson County, Texas	4.8%
482450106004	Block Group 4, Census Tract 106, Jefferson County, Texas	31.6%
482450106005	Block Group 5, Census Tract 106, Jefferson County, Texas	37.3%
482450107001	Block Group 1, Census Tract 107, Jefferson County, Texas	22.7%
482450107002	Block Group 2, Census Tract 107, Jefferson County, Texas	36.9%
482450107003	Block Group 3, Census Tract 107, Jefferson County, Texas	17.4%
482450108001	Block Group 1, Census Tract 108, Jefferson County, Texas	39.0%
482450108002	Block Group 2, Census Tract 108, Jefferson County, Texas	40.7%
482450108003	Block Group 3, Census Tract 108, Jefferson County, Texas	38.6%
482450108004	Block Group 4, Census Tract 108, Jefferson County, Texas	44.4%
482450108005	Block Group 5, Census Tract 108, Jefferson County, Texas	31.7%
482450109011	Block Group 1, Census Tract 109.01, Jefferson County, Texas	20.7%
482450109012	Block Group 2, Census Tract 109.01, Jefferson County, Texas	19.5%
482450109013	Block Group 3, Census Tract 109.01, Jefferson County, Texas	14.7%
482450109021	Block Group 1, Census Tract 109.02, Jefferson County, Texas	16.1%
482450109022	Block Group 2, Census Tract 109.02, Jefferson County, Texas	24.9%
482450109023	Block Group 3, Census Tract 109.02, Jefferson County, Texas	14.4%
482450110011	Block Group 1, Census Tract 110.01, Jefferson County, Texas	59.2%
482450110012	Block Group 2, Census Tract 110.01, Jefferson County, Texas	25.6%
482450110013	Block Group 3, Census Tract 110.01, Jefferson County, Texas	16.4%
482450110014	Block Group 4, Census Tract 110.01, Jefferson County, Texas	44.2%
482450110021	Block Group 1, Census Tract 110.02, Jefferson County, Texas	7.5%
482450110022	Block Group 2, Census Tract 110.02, Jefferson County, Texas	17.6%
482450110023	Block Group 3, Census Tract 110.02, Jefferson County, Texas	23.1%
482450111011	Block Group 1, Census Tract 111.01, Jefferson County, Texas	13.3%
482450111012	Block Group 2, Census Tract 111.01, Jefferson County, Texas	9.3%
482450111013	Block Group 3, Census Tract 111.01, Jefferson County, Texas	21.6%
482450111014	Block Group 4, Census Tract 111.01, Jefferson County, Texas	36.1%
482450111021	Block Group 1, Census Tract 111.02, Jefferson County, Texas	10.3%
482450111022	Block Group 2, Census Tract 111.02, Jefferson County, Texas	31.6%
482450111023	Block Group 3, Census Tract 111.02, Jefferson County, Texas	25.7%
482450112011	Block Group 1, Census Tract 112.01, Jefferson County, Texas	13.3%
482450112012	Block Group 2, Census Tract 112.01, Jefferson County, Texas	39.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482450112013	Block Group 3, Census Tract 112.01, Jefferson County, Texas	16.9%
482450112014	Block Group 4, Census Tract 112.01, Jefferson County, Texas	8.2%
482450112015	Block Group 5, Census Tract 112.01, Jefferson County, Texas	22.3%
482450112021	Block Group 1, Census Tract 112.02, Jefferson County, Texas	0.0%
482450112031	Block Group 1, Census Tract 112.03, Jefferson County, Texas	0.0%
482450113021	Block Group 1, Census Tract 113.02, Jefferson County, Texas	0.0%
482450113031	Block Group 1, Census Tract 113.03, Jefferson County, Texas	26.0%
482450113032	Block Group 2, Census Tract 113.03, Jefferson County, Texas	19.9%
482450113041	Block Group 1, Census Tract 113.04, Jefferson County, Texas	14.0%
482450113042	Block Group 2, Census Tract 113.04, Jefferson County, Texas	15.1%
482450114001	Block Group 1, Census Tract 114, Jefferson County, Texas	28.4%
482450114002	Block Group 2, Census Tract 114, Jefferson County, Texas	41.2%
482450114003	Block Group 3, Census Tract 114, Jefferson County, Texas	17.5%
482450114004	Block Group 4, Census Tract 114, Jefferson County, Texas	13.3%
482450114005	Block Group 5, Census Tract 114, Jefferson County, Texas	23.4%
482450115001	Block Group 1, Census Tract 115, Jefferson County, Texas	31.8%
482450116001	Block Group 1, Census Tract 116, Jefferson County, Texas	22.9%
482450116002	Block Group 2, Census Tract 116, Jefferson County, Texas	56.1%
482450117001	Block Group 1, Census Tract 117, Jefferson County, Texas	80.4%
482450117002	Block Group 2, Census Tract 117, Jefferson County, Texas	73.8%
482450118001	Block Group 1, Census Tract 118, Jefferson County, Texas	43.0%
482450118002	Block Group 2, Census Tract 118, Jefferson County, Texas	58.7%
482459800001	Block Group 1, Census Tract 9800, Jefferson County, Texas	0.0%
482459900000	Block Group 0, Census Tract 9900, Jefferson County, Texas	0.0%
482499501001	Block Group 1, Census Tract 9501, Jim Wells County, Texas	26.8%
482499501002	Block Group 2, Census Tract 9501, Jim Wells County, Texas	46.5%
482499501003	Block Group 3, Census Tract 9501, Jim Wells County, Texas	48.5%
482499501004	Block Group 4, Census Tract 9501, Jim Wells County, Texas	42.0%
482499502001	Block Group 1, Census Tract 9502, Jim Wells County, Texas	66.2%
482499502002	Block Group 2, Census Tract 9502, Jim Wells County, Texas	67.2%
482499502003	Block Group 3, Census Tract 9502, Jim Wells County, Texas	37.9%
482499502004	Block Group 4, Census Tract 9502, Jim Wells County, Texas	24.4%
482499502005	Block Group 5, Census Tract 9502, Jim Wells County, Texas	31.8%
482499502006	Block Group 6, Census Tract 9502, Jim Wells County, Texas	13.8%



Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482499503001	Block Group 1, Census Tract 9503, Jim Wells County, Texas	9.7%
482499503002	Block Group 2, Census Tract 9503, Jim Wells County, Texas	18.2%
482499503003	Block Group 3, Census Tract 9503, Jim Wells County, Texas	7.4%
482499503004	Block Group 4, Census Tract 9503, Jim Wells County, Texas	33.2%
482499503005	Block Group 5, Census Tract 9503, Jim Wells County, Texas	65.5%
482499503006	Block Group 6, Census Tract 9503, Jim Wells County, Texas	35.9%
482499504001	Block Group 1, Census Tract 9504, Jim Wells County, Texas	45.9%
482499504002	Block Group 2, Census Tract 9504, Jim Wells County, Texas	27.9%
482499504003	Block Group 3, Census Tract 9504, Jim Wells County, Texas	61.4%
482499505001	Block Group 1, Census Tract 9505, Jim Wells County, Texas	51.3%
482499505002	Block Group 2, Census Tract 9505, Jim Wells County, Texas	64.0%
482499505003	Block Group 3, Census Tract 9505, Jim Wells County, Texas	64.0%
482499505004	Block Group 4, Census Tract 9505, Jim Wells County, Texas	50.2%
482499506001	Block Group 1, Census Tract 9506, Jim Wells County, Texas	39.7%
482499506002	Block Group 2, Census Tract 9506, Jim Wells County, Texas	75.9%
482499506003	Block Group 3, Census Tract 9506, Jim Wells County, Texas	79.8%
482499506004	Block Group 4, Census Tract 9506, Jim Wells County, Texas	31.8%
482499507001	Block Group 1, Census Tract 9507, Jim Wells County, Texas	87.5%
482499507002	Block Group 2, Census Tract 9507, Jim Wells County, Texas	53.8%
482499507003	Block Group 3, Census Tract 9507, Jim Wells County, Texas	48.8%
482499507004	Block Group 4, Census Tract 9507, Jim Wells County, Texas	49.5%
482559701001	Block Group 1, Census Tract 9701, Karnes County, Texas	24.8%
482559701002	Block Group 2, Census Tract 9701, Karnes County, Texas	34.7%
482559702001	Block Group 1, Census Tract 9702, Karnes County, Texas	51.9%
482559702002	Block Group 2, Census Tract 9702, Karnes County, Texas	36.6%
482559702003	Block Group 3, Census Tract 9702, Karnes County, Texas	38.8%
482559702004	Block Group 4, Census Tract 9702, Karnes County, Texas	27.6%
482559703001	Block Group 1, Census Tract 9703, Karnes County, Texas	51.5%
482559703002	Block Group 2, Census Tract 9703, Karnes County, Texas	31.6%
482559703003	Block Group 3, Census Tract 9703, Karnes County, Texas	47.7%
482559703004	Block Group 4, Census Tract 9703, Karnes County, Texas	44.8%
482559703005	Block Group 5, Census Tract 9703, Karnes County, Texas	21.9%
482559704001	Block Group 1, Census Tract 9704, Karnes County, Texas	53.9%
482730201001	Block Group 1, Census Tract 201, Kleberg County, Texas	26.9%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482730201002	Block Group 2, Census Tract 201, Kleberg County, Texas	23.3%
482730202001	Block Group 1, Census Tract 202, Kleberg County, Texas	53.6%
482730202002	Block Group 2, Census Tract 202, Kleberg County, Texas	65.6%
482730202003	Block Group 3, Census Tract 202, Kleberg County, Texas	76.1%
482730202004	Block Group 4, Census Tract 202, Kleberg County, Texas	78.9%
482730202005	Block Group 5, Census Tract 202, Kleberg County, Texas	20.3%
482730203001	Block Group 1, Census Tract 203, Kleberg County, Texas	81.1%
482730203002	Block Group 2, Census Tract 203, Kleberg County, Texas	74.0%
482730203003	Block Group 3, Census Tract 203, Kleberg County, Texas	53.6%
482730203004	Block Group 4, Census Tract 203, Kleberg County, Texas	53.9%
482730203005	Block Group 5, Census Tract 203, Kleberg County, Texas	45.1%
482730204001	Block Group 1, Census Tract 204, Kleberg County, Texas	86.6%
482730204002	Block Group 2, Census Tract 204, Kleberg County, Texas	54.2%
482730204003	Block Group 3, Census Tract 204, Kleberg County, Texas	41.6%
482730204004	Block Group 4, Census Tract 204, Kleberg County, Texas	11.9%
482730204005	Block Group 5, Census Tract 204, Kleberg County, Texas	48.5%
482730204006	Block Group 6, Census Tract 204, Kleberg County, Texas	8.7%
482730205001	Block Group 1, Census Tract 205, Kleberg County, Texas	24.2%
482730205002	Block Group 2, Census Tract 205, Kleberg County, Texas	55.2%
482730205003	Block Group 3, Census Tract 205, Kleberg County, Texas	50.9%
482730205004	Block Group 4, Census Tract 205, Kleberg County, Texas	30.5%
482739900000	Block Group 0, Census Tract 9900, Kleberg County, Texas	0.0%
482850001001	Block Group 1, Census Tract 1, Lavaca County, Texas	48.8%
482850001002	Block Group 2, Census Tract 1, Lavaca County, Texas	35.5%
482850001003	Block Group 3, Census Tract 1, Lavaca County, Texas	23.7%
482850002001	Block Group 1, Census Tract 2, Lavaca County, Texas	42.0%
482850002002	Block Group 2, Census Tract 2, Lavaca County, Texas	46.1%
482850002003	Block Group 3, Census Tract 2, Lavaca County, Texas	48.8%
482850003001	Block Group 1, Census Tract 3, Lavaca County, Texas	36.1%
482850003002	Block Group 2, Census Tract 3, Lavaca County, Texas	45.0%
482850003003	Block Group 3, Census Tract 3, Lavaca County, Texas	42.4%
482850004001	Block Group 1, Census Tract 4, Lavaca County, Texas	14.7%
482850004002	Block Group 2, Census Tract 4, Lavaca County, Texas	17.1%
482850004003	Block Group 3, Census Tract 4, Lavaca County, Texas	29.8%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482850004004	Block Group 4, Census Tract 4, Lavaca County, Texas	47.1%
482850005001	Block Group 1, Census Tract 5, Lavaca County, Texas	40.8%
482850005002	Block Group 2, Census Tract 5, Lavaca County, Texas	22.3%
482850006001	Block Group 1, Census Tract 6, Lavaca County, Texas	35.2%
482850006002	Block Group 2, Census Tract 6, Lavaca County, Texas	43.8%
482850006003	Block Group 3, Census Tract 6, Lavaca County, Texas	64.0%
482870001001	Block Group 1, Census Tract 1, Lee County, Texas	29.5%
482870001002	Block Group 2, Census Tract 1, Lee County, Texas	8.8%
482870001003	Block Group 3, Census Tract 1, Lee County, Texas	26.4%
482870002001	Block Group 1, Census Tract 2, Lee County, Texas	41.6%
482870002002	Block Group 2, Census Tract 2, Lee County, Texas	31.7%
482870002003	Block Group 3, Census Tract 2, Lee County, Texas	18.1%
482870003001	Block Group 1, Census Tract 3, Lee County, Texas	41.5%
482870003002	Block Group 2, Census Tract 3, Lee County, Texas	31.3%
482870003003	Block Group 3, Census Tract 3, Lee County, Texas	30.8%
482870004001	Block Group 1, Census Tract 4, Lee County, Texas	45.3%
482870004002	Block Group 2, Census Tract 4, Lee County, Texas	62.6%
482870004003	Block Group 3, Census Tract 4, Lee County, Texas	61.4%
482870004004	Block Group 4, Census Tract 4, Lee County, Texas	44.8%
482917001001	Block Group 1, Census Tract 7001, Liberty County, Texas	79.3%
482917001002	Block Group 2, Census Tract 7001, Liberty County, Texas	46.2%
482917001003	Block Group 3, Census Tract 7001, Liberty County, Texas	41.5%
482917002001	Block Group 1, Census Tract 7002, Liberty County, Texas	71.3%
482917002002	Block Group 2, Census Tract 7002, Liberty County, Texas	53.5%
482917003001	Block Group 1, Census Tract 7003, Liberty County, Texas	59.8%
482917003002	Block Group 2, Census Tract 7003, Liberty County, Texas	60.0%
482917003003	Block Group 3, Census Tract 7003, Liberty County, Texas	49.0%
482917003004	Block Group 4, Census Tract 7003, Liberty County, Texas	17.8%
482917003005	Block Group 5, Census Tract 7003, Liberty County, Texas	53.0%
482917004001	Block Group 1, Census Tract 7004, Liberty County, Texas	40.7%
482917004002	Block Group 2, Census Tract 7004, Liberty County, Texas	32.7%
482917004003	Block Group 3, Census Tract 7004, Liberty County, Texas	37.8%
482917004004	Block Group 4, Census Tract 7004, Liberty County, Texas	54.0%
482917005001	Block Group 1, Census Tract 7005, Liberty County, Texas	52.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482917005002	Block Group 2, Census Tract 7005, Liberty County, Texas	34.0%
482917006001	Block Group 1, Census Tract 7006, Liberty County, Texas	57.6%
482917006002	Block Group 2, Census Tract 7006, Liberty County, Texas	56.5%
482917006003	Block Group 3, Census Tract 7006, Liberty County, Texas	59.8%
482917007001	Block Group 1, Census Tract 7007, Liberty County, Texas	26.7%
482917007002	Block Group 2, Census Tract 7007, Liberty County, Texas	25.6%
482917008001	Block Group 1, Census Tract 7008, Liberty County, Texas	22.0%
482917008002	Block Group 2, Census Tract 7008, Liberty County, Texas	48.8%
482917008003	Block Group 3, Census Tract 7008, Liberty County, Texas	11.8%
482917008004	Block Group 4, Census Tract 7008, Liberty County, Texas	49.9%
482917008005	Block Group 5, Census Tract 7008, Liberty County, Texas	43.9%
482917009001	Block Group 1, Census Tract 7009, Liberty County, Texas	37.1%
482917009002	Block Group 2, Census Tract 7009, Liberty County, Texas	27.9%
482917009003	Block Group 3, Census Tract 7009, Liberty County, Texas	0.0%
482917010001	Block Group 1, Census Tract 7010, Liberty County, Texas	37.5%
482917010002	Block Group 2, Census Tract 7010, Liberty County, Texas	47.3%
482917010003	Block Group 3, Census Tract 7010, Liberty County, Texas	42.0%
482917011001	Block Group 1, Census Tract 7011, Liberty County, Texas	22.3%
482917011002	Block Group 2, Census Tract 7011, Liberty County, Texas	42.0%
482917011003	Block Group 3, Census Tract 7011, Liberty County, Texas	35.9%
482917011004	Block Group 4, Census Tract 7011, Liberty County, Texas	51.1%
482917012001	Block Group 1, Census Tract 7012, Liberty County, Texas	31.0%
482917012002	Block Group 2, Census Tract 7012, Liberty County, Texas	72.9%
482917012003	Block Group 3, Census Tract 7012, Liberty County, Texas	37.8%
482917012004	Block Group 4, Census Tract 7012, Liberty County, Texas	43.4%
482917012005	Block Group 5, Census Tract 7012, Liberty County, Texas	66.0%
482917013001	Block Group 1, Census Tract 7013, Liberty County, Texas	51.5%
482917013002	Block Group 2, Census Tract 7013, Liberty County, Texas	39.5%
482917013003	Block Group 3, Census Tract 7013, Liberty County, Texas	43.2%
482917013004	Block Group 4, Census Tract 7013, Liberty County, Texas	43.1%
482917014001	Block Group 1, Census Tract 7014, Liberty County, Texas	26.0%
482917014002	Block Group 2, Census Tract 7014, Liberty County, Texas	53.5%
482917014003	Block Group 3, Census Tract 7014, Liberty County, Texas	42.3%
482917014004	Block Group 4, Census Tract 7014, Liberty County, Texas	51.2%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
482917014005	Block Group 5, Census Tract 7014, Liberty County, Texas	67.2%
482917014006	Block Group 6, Census Tract 7014, Liberty County, Texas	48.7%
483130001001	Block Group 1, Census Tract 1, Madison County, Texas	55.7%
483130001002	Block Group 2, Census Tract 1, Madison County, Texas	0.0%
483130001003	Block Group 3, Census Tract 1, Madison County, Texas	31.7%
483130002001	Block Group 1, Census Tract 2, Madison County, Texas	40.2%
483130002002	Block Group 2, Census Tract 2, Madison County, Texas	51.9%
483130003001	Block Group 1, Census Tract 3, Madison County, Texas	30.7%
483130003002	Block Group 2, Census Tract 3, Madison County, Texas	34.2%
483130004001	Block Group 1, Census Tract 4, Madison County, Texas	33.3%
483130004002	Block Group 2, Census Tract 4, Madison County, Texas	55.9%
483130004003	Block Group 3, Census Tract 4, Madison County, Texas	42.6%
483130004004	Block Group 4, Census Tract 4, Madison County, Texas	49.3%
483217301001	Block Group 1, Census Tract 7301, Matagorda County, Texas	42.1%
483217301002	Block Group 2, Census Tract 7301, Matagorda County, Texas	95.3%
483217301003	Block Group 3, Census Tract 7301, Matagorda County, Texas	23.1%
483217302011	Block Group 1, Census Tract 7302.01, Matagorda County, Texas	22.2%
483217302012	Block Group 2, Census Tract 7302.01, Matagorda County, Texas	20.5%
483217302013	Block Group 3, Census Tract 7302.01, Matagorda County, Texas	26.9%
483217302014	Block Group 4, Census Tract 7302.01, Matagorda County, Texas	51.7%
483217302015	Block Group 5, Census Tract 7302.01, Matagorda County, Texas	47.2%
483217302016	Block Group 6, Census Tract 7302.01, Matagorda County, Texas	65.1%
483217302017	Block Group 7, Census Tract 7302.01, Matagorda County, Texas	45.6%
483217302021	Block Group 1, Census Tract 7302.02, Matagorda County, Texas	9.7%
483217303011	Block Group 1, Census Tract 7303.01, Matagorda County, Texas	26.7%
483217303012	Block Group 2, Census Tract 7303.01, Matagorda County, Texas	52.4%
483217303013	Block Group 3, Census Tract 7303.01, Matagorda County, Texas	37.0%
483217303014	Block Group 4, Census Tract 7303.01, Matagorda County, Texas	36.0%
483217303021	Block Group 1, Census Tract 7303.02, Matagorda County, Texas	62.1%
483217303022	Block Group 2, Census Tract 7303.02, Matagorda County, Texas	56.1%
483217303023	Block Group 3, Census Tract 7303.02, Matagorda County, Texas	60.1%
483217303031	Block Group 1, Census Tract 7303.03, Matagorda County, Texas	14.5%
483217304001	Block Group 1, Census Tract 7304, Matagorda County, Texas	51.7%
483217304002	Block Group 2, Census Tract 7304, Matagorda County, Texas	50.0%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483217304003	Block Group 3, Census Tract 7304, Matagorda County, Texas	52.4%
483217305011	Block Group 1, Census Tract 7305.01, Matagorda County, Texas	3.6%
483217305012	Block Group 2, Census Tract 7305.01, Matagorda County, Texas	32.3%
483217305013	Block Group 3, Census Tract 7305.01, Matagorda County, Texas	15.4%
483217305014	Block Group 4, Census Tract 7305.01, Matagorda County, Texas	36.9%
483217306001	Block Group 1, Census Tract 7306, Matagorda County, Texas	31.7%
483217306002	Block Group 2, Census Tract 7306, Matagorda County, Texas	43.5%
483217306003	Block Group 3, Census Tract 7306, Matagorda County, Texas	36.9%
483217306004	Block Group 4, Census Tract 7306, Matagorda County, Texas	86.8%
483217306005	Block Group 5, Census Tract 7306, Matagorda County, Texas	47.2%
483217307001	Block Group 1, Census Tract 7307, Matagorda County, Texas	23.9%
483217307002	Block Group 2, Census Tract 7307, Matagorda County, Texas	45.9%
483217307003	Block Group 3, Census Tract 7307, Matagorda County, Texas	37.7%
483217307004	Block Group 4, Census Tract 7307, Matagorda County, Texas	35.2%
483219900000	Block Group 0, Census Tract 9900, Matagorda County, Texas	0.0%
483319501001	Block Group 1, Census Tract 9501, Milam County, Texas	29.2%
483319501002	Block Group 2, Census Tract 9501, Milam County, Texas	52.5%
483319503001	Block Group 1, Census Tract 9503, Milam County, Texas	19.8%
483319503002	Block Group 2, Census Tract 9503, Milam County, Texas	15.9%
483319503003	Block Group 3, Census Tract 9503, Milam County, Texas	49.4%
483319504011	Block Group 1, Census Tract 9504.01, Milam County, Texas	55.6%
483319504012	Block Group 2, Census Tract 9504.01, Milam County, Texas	26.0%
483319504021	Block Group 1, Census Tract 9504.02, Milam County, Texas	55.6%
483319504022	Block Group 2, Census Tract 9504.02, Milam County, Texas	56.3%
483319505001	Block Group 1, Census Tract 9505, Milam County, Texas	47.2%
483319505002	Block Group 2, Census Tract 9505, Milam County, Texas	40.1%
483319505003	Block Group 3, Census Tract 9505, Milam County, Texas	42.5%
483319507001	Block Group 1, Census Tract 9507, Milam County, Texas	48.6%
483319507002	Block Group 2, Census Tract 9507, Milam County, Texas	76.4%
483319507003	Block Group 3, Census Tract 9507, Milam County, Texas	56.5%
483319507004	Block Group 4, Census Tract 9507, Milam County, Texas	66.5%
483319507005	Block Group 5, Census Tract 9507, Milam County, Texas	24.7%
483319507006	Block Group 6, Census Tract 9507, Milam County, Texas	48.9%
483319508001	Block Group 1, Census Tract 9508, Milam County, Texas	35.9%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483319508002	Block Group 2, Census Tract 9508, Milam County, Texas	32.0%
483396901001	Block Group 1, Census Tract 6901, Montgomery County, Texas	9.8%
483396901002	Block Group 2, Census Tract 6901, Montgomery County, Texas	53.9%
483396901003	Block Group 3, Census Tract 6901, Montgomery County, Texas	29.9%
483396901004	Block Group 4, Census Tract 6901, Montgomery County, Texas	53.2%
483396902011	Block Group 1, Census Tract 6902.01, Montgomery County, Texas	14.4%
483396902012	Block Group 2, Census Tract 6902.01, Montgomery County, Texas	42.0%
483396902013	Block Group 3, Census Tract 6902.01, Montgomery County, Texas	20.1%
483396902014	Block Group 4, Census Tract 6902.01, Montgomery County, Texas	28.9%
483396902021	Block Group 1, Census Tract 6902.02, Montgomery County, Texas	42.9%
483396902022	Block Group 2, Census Tract 6902.02, Montgomery County, Texas	5.9%
483396902023	Block Group 3, Census Tract 6902.02, Montgomery County, Texas	71.5%
483396902024	Block Group 4, Census Tract 6902.02, Montgomery County, Texas	69.5%
483396902025	Block Group 5, Census Tract 6902.02, Montgomery County, Texas	39.7%
483396903001	Block Group 1, Census Tract 6903, Montgomery County, Texas	61.7%
483396903002	Block Group 2, Census Tract 6903, Montgomery County, Texas	34.8%
483396903003	Block Group 3, Census Tract 6903, Montgomery County, Texas	26.1%
483396904011	Block Group 1, Census Tract 6904.01, Montgomery County, Texas	20.4%
483396904012	Block Group 2, Census Tract 6904.01, Montgomery County, Texas	14.1%
483396904021	Block Group 1, Census Tract 6904.02, Montgomery County, Texas	14.8%
483396904022	Block Group 2, Census Tract 6904.02, Montgomery County, Texas	40.8%
483396904023	Block Group 3, Census Tract 6904.02, Montgomery County, Texas	12.2%
483396904024	Block Group 4, Census Tract 6904.02, Montgomery County, Texas	12.8%
483396904025	Block Group 5, Census Tract 6904.02, Montgomery County, Texas	65.7%
483396905001	Block Group 1, Census Tract 6905, Montgomery County, Texas	14.8%
483396905002	Block Group 2, Census Tract 6905, Montgomery County, Texas	8.7%
483396906011	Block Group 1, Census Tract 6906.01, Montgomery County, Texas	12.5%
483396906012	Block Group 2, Census Tract 6906.01, Montgomery County, Texas	10.3%
483396906013	Block Group 3, Census Tract 6906.01, Montgomery County, Texas	14.1%
483396906014	Block Group 4, Census Tract 6906.01, Montgomery County, Texas	18.2%
483396906015	Block Group 5, Census Tract 6906.01, Montgomery County, Texas	17.5%
483396906016	Block Group 6, Census Tract 6906.01, Montgomery County, Texas	3.7%
483396906021	Block Group 1, Census Tract 6906.02, Montgomery County, Texas	7.9%
483396906022	Block Group 2, Census Tract 6906.02, Montgomery County, Texas	17.6%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483396906023	Block Group 3, Census Tract 6906.02, Montgomery County, Texas	1.4%
483396906024	Block Group 4, Census Tract 6906.02, Montgomery County, Texas	17.6%
483396907001	Block Group 1, Census Tract 6907, Montgomery County, Texas	12.2%
483396907002	Block Group 2, Census Tract 6907, Montgomery County, Texas	29.8%
483396908001	Block Group 1, Census Tract 6908, Montgomery County, Texas	4.9%
483396908002	Block Group 2, Census Tract 6908, Montgomery County, Texas	11.6%
483396909001	Block Group 1, Census Tract 6909, Montgomery County, Texas	9.8%
483396909002	Block Group 2, Census Tract 6909, Montgomery County, Texas	5.1%
483396910001	Block Group 1, Census Tract 6910, Montgomery County, Texas	7.1%
483396910002	Block Group 2, Census Tract 6910, Montgomery County, Texas	5.0%
483396911001	Block Group 1, Census Tract 6911, Montgomery County, Texas	17.7%
483396911002	Block Group 2, Census Tract 6911, Montgomery County, Texas	23.4%
483396912001	Block Group 1, Census Tract 6912, Montgomery County, Texas	14.5%
483396912002	Block Group 2, Census Tract 6912, Montgomery County, Texas	46.1%
483396912003	Block Group 3, Census Tract 6912, Montgomery County, Texas	3.4%
483396913011	Block Group 1, Census Tract 6913.01, Montgomery County, Texas	16.3%
483396913012	Block Group 2, Census Tract 6913.01, Montgomery County, Texas	7.1%
483396913021	Block Group 1, Census Tract 6913.02, Montgomery County, Texas	44.9%
483396913022	Block Group 2, Census Tract 6913.02, Montgomery County, Texas	37.7%
483396914001	Block Group 1, Census Tract 6914, Montgomery County, Texas	32.3%
483396914002	Block Group 2, Census Tract 6914, Montgomery County, Texas	31.0%
483396914003	Block Group 3, Census Tract 6914, Montgomery County, Texas	47.7%
483396915001	Block Group 1, Census Tract 6915, Montgomery County, Texas	10.2%
483396915002	Block Group 2, Census Tract 6915, Montgomery County, Texas	20.2%
483396915003	Block Group 3, Census Tract 6915, Montgomery County, Texas	20.1%
483396915004	Block Group 4, Census Tract 6915, Montgomery County, Texas	67.0%
483396916011	Block Group 1, Census Tract 6916.01, Montgomery County, Texas	31.9%
483396916012	Block Group 2, Census Tract 6916.01, Montgomery County, Texas	6.0%
483396916021	Block Group 1, Census Tract 6916.02, Montgomery County, Texas	40.5%
483396916022	Block Group 2, Census Tract 6916.02, Montgomery County, Texas	25.6%
483396917001	Block Group 1, Census Tract 6917, Montgomery County, Texas	36.9%
483396918001	Block Group 1, Census Tract 6918, Montgomery County, Texas	28.8%
483396918002	Block Group 2, Census Tract 6918, Montgomery County, Texas	23.9%
483396918003	Block Group 3, Census Tract 6918, Montgomery County, Texas	13.3%



Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483396918004	Block Group 4, Census Tract 6918, Montgomery County, Texas	22.3%
483396918005	Block Group 5, Census Tract 6918, Montgomery County, Texas	64.5%
483396919001	Block Group 1, Census Tract 6919, Montgomery County, Texas	7.3%
483396919002	Block Group 2, Census Tract 6919, Montgomery County, Texas	39.8%
483396919003	Block Group 3, Census Tract 6919, Montgomery County, Texas	20.7%
483396920011	Block Group 1, Census Tract 6920.01, Montgomery County, Texas	11.4%
483396920012	Block Group 2, Census Tract 6920.01, Montgomery County, Texas	17.4%
483396920013	Block Group 3, Census Tract 6920.01, Montgomery County, Texas	30.7%
483396920014	Block Group 4, Census Tract 6920.01, Montgomery County, Texas	20.1%
483396920015	Block Group 5, Census Tract 6920.01, Montgomery County, Texas	20.0%
483396920016	Block Group 6, Census Tract 6920.01, Montgomery County, Texas	20.2%
483396920021	Block Group 1, Census Tract 6920.02, Montgomery County, Texas	1.0%
483396920022	Block Group 2, Census Tract 6920.02, Montgomery County, Texas	10.6%
483396921001	Block Group 1, Census Tract 6921, Montgomery County, Texas	46.9%
483396921002	Block Group 2, Census Tract 6921, Montgomery County, Texas	17.5%
483396921003	Block Group 3, Census Tract 6921, Montgomery County, Texas	5.3%
483396922001	Block Group 1, Census Tract 6922, Montgomery County, Texas	51.4%
483396922002	Block Group 2, Census Tract 6922, Montgomery County, Texas	29.2%
483396922003	Block Group 3, Census Tract 6922, Montgomery County, Texas	60.2%
483396922004	Block Group 4, Census Tract 6922, Montgomery County, Texas	21.7%
483396923001	Block Group 1, Census Tract 6923, Montgomery County, Texas	59.4%
483396923002	Block Group 2, Census Tract 6923, Montgomery County, Texas	67.1%
483396923003	Block Group 3, Census Tract 6923, Montgomery County, Texas	14.3%
483396923004	Block Group 4, Census Tract 6923, Montgomery County, Texas	18.5%
483396923005	Block Group 5, Census Tract 6923, Montgomery County, Texas	24.4%
483396924001	Block Group 1, Census Tract 6924, Montgomery County, Texas	42.7%
483396924002	Block Group 2, Census Tract 6924, Montgomery County, Texas	45.3%
483396924003	Block Group 3, Census Tract 6924, Montgomery County, Texas	39.3%
483396925001	Block Group 1, Census Tract 6925, Montgomery County, Texas	48.9%
483396925002	Block Group 2, Census Tract 6925, Montgomery County, Texas	31.1%
483396925003	Block Group 3, Census Tract 6925, Montgomery County, Texas	46.8%
483396925004	Block Group 4, Census Tract 6925, Montgomery County, Texas	51.3%
483396926011	Block Group 1, Census Tract 6926.01, Montgomery County, Texas	42.7%
483396926012	Block Group 2, Census Tract 6926.01, Montgomery County, Texas	73.6%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483396926021	Block Group 1, Census Tract 6926.02, Montgomery County, Texas	62.1%
483396926022	Block Group 2, Census Tract 6926.02, Montgomery County, Texas	47.3%
483396926023	Block Group 3, Census Tract 6926.02, Montgomery County, Texas	54.4%
483396927001	Block Group 1, Census Tract 6927, Montgomery County, Texas	43.3%
483396927002	Block Group 2, Census Tract 6927, Montgomery County, Texas	31.7%
483396927003	Block Group 3, Census Tract 6927, Montgomery County, Texas	31.9%
483396928011	Block Group 1, Census Tract 6928.01, Montgomery County, Texas	28.2%
483396928012	Block Group 2, Census Tract 6928.01, Montgomery County, Texas	38.0%
483396928013	Block Group 3, Census Tract 6928.01, Montgomery County, Texas	64.0%
483396928014	Block Group 4, Census Tract 6928.01, Montgomery County, Texas	44.4%
483396928021	Block Group 1, Census Tract 6928.02, Montgomery County, Texas	57.0%
483396928022	Block Group 2, Census Tract 6928.02, Montgomery County, Texas	37.2%
483396928023	Block Group 3, Census Tract 6928.02, Montgomery County, Texas	21.4%
483396929001	Block Group 1, Census Tract 6929, Montgomery County, Texas	58.1%
483396929002	Block Group 2, Census Tract 6929, Montgomery County, Texas	32.1%
483396930001	Block Group 1, Census Tract 6930, Montgomery County, Texas	62.1%
483396930002	Block Group 2, Census Tract 6930, Montgomery County, Texas	61.5%
483396930003	Block Group 3, Census Tract 6930, Montgomery County, Texas	74.8%
483396930004	Block Group 4, Census Tract 6930, Montgomery County, Texas	63.2%
483396931011	Block Group 1, Census Tract 6931.01, Montgomery County, Texas	100.0%
483396931012	Block Group 2, Census Tract 6931.01, Montgomery County, Texas	88.4%
483396931013	Block Group 3, Census Tract 6931.01, Montgomery County, Texas	50.3%
483396931014	Block Group 4, Census Tract 6931.01, Montgomery County, Texas	71.5%
483396931021	Block Group 1, Census Tract 6931.02, Montgomery County, Texas	55.1%
483396931022	Block Group 2, Census Tract 6931.02, Montgomery County, Texas	58.3%
483396932001	Block Group 1, Census Tract 6932, Montgomery County, Texas	32.1%
483396932002	Block Group 2, Census Tract 6932, Montgomery County, Texas	11.8%
483396932003	Block Group 3, Census Tract 6932, Montgomery County, Texas	33.6%
483396932004	Block Group 4, Census Tract 6932, Montgomery County, Texas	10.6%
483396933001	Block Group 1, Census Tract 6933, Montgomery County, Texas	74.6%
483396933002	Block Group 2, Census Tract 6933, Montgomery County, Texas	25.7%
483396933003	Block Group 3, Census Tract 6933, Montgomery County, Texas	38.8%
483396934001	Block Group 1, Census Tract 6934, Montgomery County, Texas	79.6%
483396934002	Block Group 2, Census Tract 6934, Montgomery County, Texas	67.7%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483396934003	Block Group 3, Census Tract 6934, Montgomery County, Texas	95.7%
483396935001	Block Group 1, Census Tract 6935, Montgomery County, Texas	45.8%
483396935002	Block Group 2, Census Tract 6935, Montgomery County, Texas	60.9%
483396935003	Block Group 3, Census Tract 6935, Montgomery County, Texas	74.4%
483396935004	Block Group 4, Census Tract 6935, Montgomery County, Texas	68.5%
483396936001	Block Group 1, Census Tract 6936, Montgomery County, Texas	40.3%
483396936002	Block Group 2, Census Tract 6936, Montgomery County, Texas	40.9%
483396937001	Block Group 1, Census Tract 6937, Montgomery County, Texas	35.9%
483396937002	Block Group 2, Census Tract 6937, Montgomery County, Texas	20.9%
483396938001	Block Group 1, Census Tract 6938, Montgomery County, Texas	60.3%
483396939001	Block Group 1, Census Tract 6939, Montgomery County, Texas	79.9%
483396939002	Block Group 2, Census Tract 6939, Montgomery County, Texas	78.9%
483396939003	Block Group 3, Census Tract 6939, Montgomery County, Texas	45.4%
483396939004	Block Group 4, Census Tract 6939, Montgomery County, Texas	71.4%
483396939005	Block Group 5, Census Tract 6939, Montgomery County, Texas	48.4%
483396939006	Block Group 6, Census Tract 6939, Montgomery County, Texas	87.8%
483396940001	Block Group 1, Census Tract 6940, Montgomery County, Texas	38.3%
483396940002	Block Group 2, Census Tract 6940, Montgomery County, Texas	35.9%
483396940003	Block Group 3, Census Tract 6940, Montgomery County, Texas	48.2%
483396940004	Block Group 4, Census Tract 6940, Montgomery County, Texas	41.3%
483396941011	Block Group 1, Census Tract 6941.01, Montgomery County, Texas	76.2%
483396941012	Block Group 2, Census Tract 6941.01, Montgomery County, Texas	43.9%
483396941013	Block Group 3, Census Tract 6941.01, Montgomery County, Texas	78.1%
483396941014	Block Group 4, Census Tract 6941.01, Montgomery County, Texas	56.5%
483396941015	Block Group 5, Census Tract 6941.01, Montgomery County, Texas	48.4%
483396941021	Block Group 1, Census Tract 6941.02, Montgomery County, Texas	42.6%
483396941022	Block Group 2, Census Tract 6941.02, Montgomery County, Texas	43.1%
483396942011	Block Group 1, Census Tract 6942.01, Montgomery County, Texas	74.3%
483396942012	Block Group 2, Census Tract 6942.01, Montgomery County, Texas	29.1%
483396942013	Block Group 3, Census Tract 6942.01, Montgomery County, Texas	32.0%
483396942021	Block Group 1, Census Tract 6942.02, Montgomery County, Texas	20.4%
483396942022	Block Group 2, Census Tract 6942.02, Montgomery County, Texas	27.0%
483396942023	Block Group 3, Census Tract 6942.02, Montgomery County, Texas	9.2%
483396942024	Block Group 4, Census Tract 6942.02, Montgomery County, Texas	17.1%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483396942025	Block Group 5, Census Tract 6942.02, Montgomery County, Texas	24.9%
483396943011	Block Group 1, Census Tract 6943.01, Montgomery County, Texas	13.8%
483396943012	Block Group 2, Census Tract 6943.01, Montgomery County, Texas	14.2%
483396943013	Block Group 3, Census Tract 6943.01, Montgomery County, Texas	24.1%
483396943021	Block Group 1, Census Tract 6943.02, Montgomery County, Texas	14.9%
483396943022	Block Group 2, Census Tract 6943.02, Montgomery County, Texas	20.3%
483396943023	Block Group 3, Census Tract 6943.02, Montgomery County, Texas	20.2%
483396944001	Block Group 1, Census Tract 6944, Montgomery County, Texas	38.3%
483396944002	Block Group 2, Census Tract 6944, Montgomery County, Texas	35.4%
483396944003	Block Group 3, Census Tract 6944, Montgomery County, Texas	35.1%
483396945001	Block Group 1, Census Tract 6945, Montgomery County, Texas	28.4%
483396945002	Block Group 2, Census Tract 6945, Montgomery County, Texas	14.9%
483396946001	Block Group 1, Census Tract 6946, Montgomery County, Texas	31.2%
483396946002	Block Group 2, Census Tract 6946, Montgomery County, Texas	33.2%
483396946003	Block Group 3, Census Tract 6946, Montgomery County, Texas	9.9%
483396947001	Block Group 1, Census Tract 6947, Montgomery County, Texas	38.7%
483396947002	Block Group 2, Census Tract 6947, Montgomery County, Texas	19.5%
483519501001	Block Group 1, Census Tract 9501, Newton County, Texas	36.9%
483519501002	Block Group 2, Census Tract 9501, Newton County, Texas	65.2%
483519501003	Block Group 3, Census Tract 9501, Newton County, Texas	49.2%
483519502001	Block Group 1, Census Tract 9502, Newton County, Texas	44.0%
483519502002	Block Group 2, Census Tract 9502, Newton County, Texas	76.0%
483519502003	Block Group 3, Census Tract 9502, Newton County, Texas	32.4%
483519502004	Block Group 4, Census Tract 9502, Newton County, Texas	33.8%
483519502005	Block Group 5, Census Tract 9502, Newton County, Texas	45.5%
483519502006	Block Group 6, Census Tract 9502, Newton County, Texas	23.1%
483519503001	Block Group 1, Census Tract 9503, Newton County, Texas	30.4%
483519503002	Block Group 2, Census Tract 9503, Newton County, Texas	40.5%
483519504001	Block Group 1, Census Tract 9504, Newton County, Texas	37.3%
483519504002	Block Group 2, Census Tract 9504, Newton County, Texas	17.0%
483519504003	Block Group 3, Census Tract 9504, Newton County, Texas	19.5%
483550005001	Block Group 1, Census Tract 5, Nueces County, Texas	54.4%
483550006001	Block Group 1, Census Tract 6, Nueces County, Texas	53.1%
483550006002	Block Group 2, Census Tract 6, Nueces County, Texas	90.1%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483550006003	Block Group 3, Census Tract 6, Nueces County, Texas	93.8%
483550006004	Block Group 4, Census Tract 6, Nueces County, Texas	82.0%
483550006005	Block Group 5, Census Tract 6, Nueces County, Texas	55.2%
483550006006	Block Group 6, Census Tract 6, Nueces County, Texas	69.6%
483550006007	Block Group 7, Census Tract 6, Nueces County, Texas	78.9%
483550007001	Block Group 1, Census Tract 7, Nueces County, Texas	68.7%
483550007002	Block Group 2, Census Tract 7, Nueces County, Texas	72.4%
483550007003	Block Group 3, Census Tract 7, Nueces County, Texas	46.8%
483550008001	Block Group 1, Census Tract 8, Nueces County, Texas	69.9%
483550008002	Block Group 2, Census Tract 8, Nueces County, Texas	76.6%
483550009001	Block Group 1, Census Tract 9, Nueces County, Texas	75.7%
483550009002	Block Group 2, Census Tract 9, Nueces County, Texas	77.7%
483550009003	Block Group 3, Census Tract 9, Nueces County, Texas	86.7%
483550009004	Block Group 4, Census Tract 9, Nueces County, Texas	61.2%
483550010001	Block Group 1, Census Tract 10, Nueces County, Texas	63.4%
483550010002	Block Group 2, Census Tract 10, Nueces County, Texas	58.5%
483550010003	Block Group 3, Census Tract 10, Nueces County, Texas	79.0%
483550010004	Block Group 4, Census Tract 10, Nueces County, Texas	76.2%
483550011001	Block Group 1, Census Tract 11, Nueces County, Texas	88.0%
483550011002	Block Group 2, Census Tract 11, Nueces County, Texas	54.4%
483550012001	Block Group 1, Census Tract 12, Nueces County, Texas	78.1%
483550012002	Block Group 2, Census Tract 12, Nueces County, Texas	60.3%
483550012003	Block Group 3, Census Tract 12, Nueces County, Texas	70.3%
483550013001	Block Group 1, Census Tract 13, Nueces County, Texas	50.7%
483550013002	Block Group 2, Census Tract 13, Nueces County, Texas	94.4%
483550013003	Block Group 3, Census Tract 13, Nueces County, Texas	58.7%
483550013004	Block Group 4, Census Tract 13, Nueces County, Texas	60.6%
483550014001	Block Group 1, Census Tract 14, Nueces County, Texas	36.3%
483550014002	Block Group 2, Census Tract 14, Nueces County, Texas	12.6%
483550014003	Block Group 3, Census Tract 14, Nueces County, Texas	24.2%
483550014004	Block Group 4, Census Tract 14, Nueces County, Texas	21.8%
483550015001	Block Group 1, Census Tract 15, Nueces County, Texas	98.3%
483550015002	Block Group 2, Census Tract 15, Nueces County, Texas	70.4%
483550015003	Block Group 3, Census Tract 15, Nueces County, Texas	44.8%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483550016011	Block Group 1, Census Tract 16.01, Nueces County, Texas	47.3%
483550016012	Block Group 2, Census Tract 16.01, Nueces County, Texas	67.2%
483550016013	Block Group 3, Census Tract 16.01, Nueces County, Texas	44.5%
483550016014	Block Group 4, Census Tract 16.01, Nueces County, Texas	79.8%
483550016021	Block Group 1, Census Tract 16.02, Nueces County, Texas	44.8%
483550016022	Block Group 2, Census Tract 16.02, Nueces County, Texas	67.9%
483550016023	Block Group 3, Census Tract 16.02, Nueces County, Texas	44.4%
483550017011	Block Group 1, Census Tract 17.01, Nueces County, Texas	44.9%
483550017012	Block Group 2, Census Tract 17.01, Nueces County, Texas	29.1%
483550017013	Block Group 3, Census Tract 17.01, Nueces County, Texas	28.2%
483550017014	Block Group 4, Census Tract 17.01, Nueces County, Texas	41.0%
483550017015	Block Group 5, Census Tract 17.01, Nueces County, Texas	100.0%
483550017016	Block Group 6, Census Tract 17.01, Nueces County, Texas	56.9%
483550017021	Block Group 1, Census Tract 17.02, Nueces County, Texas	44.0%
483550017022	Block Group 2, Census Tract 17.02, Nueces County, Texas	42.4%
483550018011	Block Group 1, Census Tract 18.01, Nueces County, Texas	85.4%
483550018012	Block Group 2, Census Tract 18.01, Nueces County, Texas	58.1%
483550018013	Block Group 3, Census Tract 18.01, Nueces County, Texas	71.4%
483550018014	Block Group 4, Census Tract 18.01, Nueces County, Texas	61.2%
483550018015	Block Group 5, Census Tract 18.01, Nueces County, Texas	63.9%
483550018021	Block Group 1, Census Tract 18.02, Nueces County, Texas	33.8%
483550018022	Block Group 2, Census Tract 18.02, Nueces County, Texas	43.0%
483550019021	Block Group 1, Census Tract 19.02, Nueces County, Texas	16.4%
483550019022	Block Group 2, Census Tract 19.02, Nueces County, Texas	57.3%
483550019023	Block Group 3, Census Tract 19.02, Nueces County, Texas	27.3%
483550019031	Block Group 1, Census Tract 19.03, Nueces County, Texas	44.9%
483550019032	Block Group 2, Census Tract 19.03, Nueces County, Texas	84.8%
483550019033	Block Group 3, Census Tract 19.03, Nueces County, Texas	48.9%
483550019041	Block Group 1, Census Tract 19.04, Nueces County, Texas	36.7%
483550019042	Block Group 2, Census Tract 19.04, Nueces County, Texas	56.5%
483550019043	Block Group 3, Census Tract 19.04, Nueces County, Texas	61.2%
483550020011	Block Group 1, Census Tract 20.01, Nueces County, Texas	56.6%
483550020012	Block Group 2, Census Tract 20.01, Nueces County, Texas	46.7%
483550020013	Block Group 3, Census Tract 20.01, Nueces County, Texas	27.7%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483550020014	Block Group 4, Census Tract 20.01, Nueces County, Texas	82.2%
483550020021	Block Group 1, Census Tract 20.02, Nueces County, Texas	50.9%
483550020022	Block Group 2, Census Tract 20.02, Nueces County, Texas	69.1%
483550020023	Block Group 3, Census Tract 20.02, Nueces County, Texas	35.6%
483550021011	Block Group 1, Census Tract 21.01, Nueces County, Texas	79.9%
483550021012	Block Group 2, Census Tract 21.01, Nueces County, Texas	12.4%
483550021013	Block Group 3, Census Tract 21.01, Nueces County, Texas	51.3%
483550021014	Block Group 4, Census Tract 21.01, Nueces County, Texas	55.0%
483550021021	Block Group 1, Census Tract 21.02, Nueces County, Texas	24.2%
483550021022	Block Group 2, Census Tract 21.02, Nueces County, Texas	24.9%
483550021023	Block Group 3, Census Tract 21.02, Nueces County, Texas	6.6%
483550022001	Block Group 1, Census Tract 22, Nueces County, Texas	33.6%
483550022002	Block Group 2, Census Tract 22, Nueces County, Texas	72.2%
483550022003	Block Group 3, Census Tract 22, Nueces County, Texas	28.7%
483550022004	Block Group 4, Census Tract 22, Nueces County, Texas	52.4%
483550022005	Block Group 5, Census Tract 22, Nueces County, Texas	58.3%
483550023011	Block Group 1, Census Tract 23.01, Nueces County, Texas	58.2%
483550023012	Block Group 2, Census Tract 23.01, Nueces County, Texas	39.8%
483550023013	Block Group 3, Census Tract 23.01, Nueces County, Texas	29.6%
483550023031	Block Group 1, Census Tract 23.03, Nueces County, Texas	39.8%
483550023032	Block Group 2, Census Tract 23.03, Nueces County, Texas	65.2%
483550023033	Block Group 3, Census Tract 23.03, Nueces County, Texas	26.0%
483550023041	Block Group 1, Census Tract 23.04, Nueces County, Texas	44.7%
483550023042	Block Group 2, Census Tract 23.04, Nueces County, Texas	45.5%
483550023043	Block Group 3, Census Tract 23.04, Nueces County, Texas	66.1%
483550023044	Block Group 4, Census Tract 23.04, Nueces County, Texas	17.1%
483550024001	Block Group 1, Census Tract 24, Nueces County, Texas	42.5%
483550024002	Block Group 2, Census Tract 24, Nueces County, Texas	43.2%
483550024003	Block Group 3, Census Tract 24, Nueces County, Texas	43.1%
483550024004	Block Group 4, Census Tract 24, Nueces County, Texas	41.7%
483550024005	Block Group 5, Census Tract 24, Nueces County, Texas	36.4%
483550025001	Block Group 1, Census Tract 25, Nueces County, Texas	23.0%
483550025002	Block Group 2, Census Tract 25, Nueces County, Texas	11.8%
483550025003	Block Group 3, Census Tract 25, Nueces County, Texas	21.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483550025004	Block Group 4, Census Tract 25, Nueces County, Texas	54.6%
483550026011	Block Group 1, Census Tract 26.01, Nueces County, Texas	41.3%
483550026012	Block Group 2, Census Tract 26.01, Nueces County, Texas	55.5%
483550026021	Block Group 1, Census Tract 26.02, Nueces County, Texas	46.6%
483550026022	Block Group 2, Census Tract 26.02, Nueces County, Texas	61.7%
483550026031	Block Group 1, Census Tract 26.03, Nueces County, Texas	32.8%
483550026032	Block Group 2, Census Tract 26.03, Nueces County, Texas	29.5%
483550026033	Block Group 3, Census Tract 26.03, Nueces County, Texas	16.3%
483550027031	Block Group 1, Census Tract 27.03, Nueces County, Texas	35.7%
483550027032	Block Group 2, Census Tract 27.03, Nueces County, Texas	55.5%
483550027033	Block Group 3, Census Tract 27.03, Nueces County, Texas	28.1%
483550027034	Block Group 4, Census Tract 27.03, Nueces County, Texas	12.9%
483550027035	Block Group 5, Census Tract 27.03, Nueces County, Texas	10.8%
483550027041	Block Group 1, Census Tract 27.04, Nueces County, Texas	31.3%
483550027042	Block Group 2, Census Tract 27.04, Nueces County, Texas	49.1%
483550027043	Block Group 3, Census Tract 27.04, Nueces County, Texas	52.5%
483550027044	Block Group 4, Census Tract 27.04, Nueces County, Texas	29.8%
483550027051	Block Group 1, Census Tract 27.05, Nueces County, Texas	7.1%
483550027052	Block Group 2, Census Tract 27.05, Nueces County, Texas	18.5%
483550027053	Block Group 3, Census Tract 27.05, Nueces County, Texas	21.5%
483550027054	Block Group 4, Census Tract 27.05, Nueces County, Texas	36.8%
483550027061	Block Group 1, Census Tract 27.06, Nueces County, Texas	100.0%
483550029001	Block Group 1, Census Tract 29, Nueces County, Texas	38.1%
483550030011	Block Group 1, Census Tract 30.01, Nueces County, Texas	41.4%
483550030012	Block Group 2, Census Tract 30.01, Nueces County, Texas	60.9%
483550030013	Block Group 3, Census Tract 30.01, Nueces County, Texas	70.2%
483550030021	Block Group 1, Census Tract 30.02, Nueces County, Texas	37.9%
483550030022	Block Group 2, Census Tract 30.02, Nueces County, Texas	55.9%
483550030023	Block Group 3, Census Tract 30.02, Nueces County, Texas	61.6%
483550031011	Block Group 1, Census Tract 31.01, Nueces County, Texas	29.6%
483550031012	Block Group 2, Census Tract 31.01, Nueces County, Texas	7.9%
483550031013	Block Group 3, Census Tract 31.01, Nueces County, Texas	2.2%
483550031014	Block Group 4, Census Tract 31.01, Nueces County, Texas	18.7%
483550031015	Block Group 5, Census Tract 31.01, Nueces County, Texas	40.6%



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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483550031021	Block Group 1, Census Tract 31.02, Nueces County, Texas	25.9%
483550031022	Block Group 2, Census Tract 31.02, Nueces County, Texas	22.1%
483550032021	Block Group 1, Census Tract 32.02, Nueces County, Texas	15.2%
483550032022	Block Group 2, Census Tract 32.02, Nueces County, Texas	35.4%
483550032023	Block Group 3, Census Tract 32.02, Nueces County, Texas	18.3%
483550032031	Block Group 1, Census Tract 32.03, Nueces County, Texas	41.8%
483550032032	Block Group 2, Census Tract 32.03, Nueces County, Texas	65.2%
483550032033	Block Group 3, Census Tract 32.03, Nueces County, Texas	39.0%
483550032041	Block Group 1, Census Tract 32.04, Nueces County, Texas	31.3%
483550032042	Block Group 2, Census Tract 32.04, Nueces County, Texas	4.9%
483550033031	Block Group 1, Census Tract 33.03, Nueces County, Texas	43.2%
483550033032	Block Group 2, Census Tract 33.03, Nueces County, Texas	72.8%
483550033041	Block Group 1, Census Tract 33.04, Nueces County, Texas	35.1%
483550033042	Block Group 2, Census Tract 33.04, Nueces County, Texas	21.6%
483550033043	Block Group 3, Census Tract 33.04, Nueces County, Texas	26.3%
483550033051	Block Group 1, Census Tract 33.05, Nueces County, Texas	64.7%
483550033052	Block Group 2, Census Tract 33.05, Nueces County, Texas	96.9%
483550033061	Block Group 1, Census Tract 33.06, Nueces County, Texas	33.0%
483550033062	Block Group 2, Census Tract 33.06, Nueces County, Texas	39.0%
483550034011	Block Group 1, Census Tract 34.01, Nueces County, Texas	48.2%
483550034012	Block Group 2, Census Tract 34.01, Nueces County, Texas	39.7%
483550034013	Block Group 3, Census Tract 34.01, Nueces County, Texas	20.5%
483550034021	Block Group 1, Census Tract 34.02, Nueces County, Texas	50.0%
483550034022	Block Group 2, Census Tract 34.02, Nueces County, Texas	70.5%
483550034023	Block Group 3, Census Tract 34.02, Nueces County, Texas	50.1%
483550034024	Block Group 4, Census Tract 34.02, Nueces County, Texas	1.5%
483550034025	Block Group 5, Census Tract 34.02, Nueces County, Texas	8.7%
483550035001	Block Group 1, Census Tract 35, Nueces County, Texas	33.5%
483550035002	Block Group 2, Census Tract 35, Nueces County, Texas	67.4%
483550036011	Block Group 1, Census Tract 36.01, Nueces County, Texas	77.1%
483550036012	Block Group 2, Census Tract 36.01, Nueces County, Texas	12.4%
483550036013	Block Group 3, Census Tract 36.01, Nueces County, Texas	31.6%
483550036014	Block Group 4, Census Tract 36.01, Nueces County, Texas	13.7%
483550036021	Block Group 1, Census Tract 36.02, Nueces County, Texas	48.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483550036022	Block Group 2, Census Tract 36.02, Nueces County, Texas	19.9%
483550036023	Block Group 3, Census Tract 36.02, Nueces County, Texas	26.5%
483550036024	Block Group 4, Census Tract 36.02, Nueces County, Texas	38.9%
483550036031	Block Group 1, Census Tract 36.03, Nueces County, Texas	35.3%
483550036032	Block Group 2, Census Tract 36.03, Nueces County, Texas	30.1%
483550037001	Block Group 1, Census Tract 37, Nueces County, Texas	34.2%
483550037002	Block Group 2, Census Tract 37, Nueces County, Texas	31.9%
483550037003	Block Group 3, Census Tract 37, Nueces County, Texas	35.3%
483550051021	Block Group 1, Census Tract 51.02, Nueces County, Texas	39.9%
483550051022	Block Group 2, Census Tract 51.02, Nueces County, Texas	41.3%
483550054041	Block Group 1, Census Tract 54.04, Nueces County, Texas	4.6%
483550054042	Block Group 2, Census Tract 54.04, Nueces County, Texas	15.1%
483550054061	Block Group 1, Census Tract 54.06, Nueces County, Texas	26.8%
483550054062	Block Group 2, Census Tract 54.06, Nueces County, Texas	39.9%
483550054063	Block Group 3, Census Tract 54.06, Nueces County, Texas	4.8%
483550054071	Block Group 1, Census Tract 54.07, Nueces County, Texas	34.8%
483550054072	Block Group 2, Census Tract 54.07, Nueces County, Texas	17.6%
483550054081	Block Group 1, Census Tract 54.08, Nueces County, Texas	57.6%
483550054082	Block Group 2, Census Tract 54.08, Nueces County, Texas	33.6%
483550054091	Block Group 1, Census Tract 54.09, Nueces County, Texas	4.0%
483550054092	Block Group 2, Census Tract 54.09, Nueces County, Texas	5.8%
483550054101	Block Group 1, Census Tract 54.10, Nueces County, Texas	22.8%
483550054102	Block Group 2, Census Tract 54.10, Nueces County, Texas	9.3%
483550054111	Block Group 1, Census Tract 54.11, Nueces County, Texas	18.8%
483550054112	Block Group 2, Census Tract 54.11, Nueces County, Texas	37.3%
483550054121	Block Group 1, Census Tract 54.12, Nueces County, Texas	8.2%
483550054122	Block Group 2, Census Tract 54.12, Nueces County, Texas	5.6%
483550054131	Block Group 1, Census Tract 54.13, Nueces County, Texas	17.1%
483550054132	Block Group 2, Census Tract 54.13, Nueces County, Texas	39.1%
483550054141	Block Group 1, Census Tract 54.14, Nueces County, Texas	1.9%
483550054142	Block Group 2, Census Tract 54.14, Nueces County, Texas	9.3%
483550054151	Block Group 1, Census Tract 54.15, Nueces County, Texas	20.1%
483550054152	Block Group 2, Census Tract 54.15, Nueces County, Texas	7.6%
483550054161	Block Group 1, Census Tract 54.16, Nueces County, Texas	1.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483550054162	Block Group 2, Census Tract 54.16, Nueces County, Texas	1.8%
483550054171	Block Group 1, Census Tract 54.17, Nueces County, Texas	16.5%
483550054172	Block Group 2, Census Tract 54.17, Nueces County, Texas	24.8%
483550056011	Block Group 1, Census Tract 56.01, Nueces County, Texas	18.1%
483550056012	Block Group 2, Census Tract 56.01, Nueces County, Texas	28.8%
483550056013	Block Group 3, Census Tract 56.01, Nueces County, Texas	49.1%
483550056014	Block Group 4, Census Tract 56.01, Nueces County, Texas	41.5%
483550056015	Block Group 5, Census Tract 56.01, Nueces County, Texas	30.4%
483550056021	Block Group 1, Census Tract 56.02, Nueces County, Texas	65.5%
483550056022	Block Group 2, Census Tract 56.02, Nueces County, Texas	92.1%
483550056023	Block Group 3, Census Tract 56.02, Nueces County, Texas	77.1%
483550056024	Block Group 4, Census Tract 56.02, Nueces County, Texas	74.2%
483550058011	Block Group 1, Census Tract 58.01, Nueces County, Texas	10.5%
483550058012	Block Group 2, Census Tract 58.01, Nueces County, Texas	4.0%
483550058013	Block Group 3, Census Tract 58.01, Nueces County, Texas	5.4%
483550058021	Block Group 1, Census Tract 58.02, Nueces County, Texas	35.6%
483550058022	Block Group 2, Census Tract 58.02, Nueces County, Texas	40.8%
483550058023	Block Group 3, Census Tract 58.02, Nueces County, Texas	28.0%
483550059001	Block Group 1, Census Tract 59, Nueces County, Texas	60.9%
483550059002	Block Group 2, Census Tract 59, Nueces County, Texas	40.4%
483550060001	Block Group 1, Census Tract 60, Nueces County, Texas	27.0%
483550060002	Block Group 2, Census Tract 60, Nueces County, Texas	35.6%
483550061001	Block Group 1, Census Tract 61, Nueces County, Texas	76.8%
483550061002	Block Group 2, Census Tract 61, Nueces County, Texas	29.4%
483550061003	Block Group 3, Census Tract 61, Nueces County, Texas	21.6%
483550062001	Block Group 1, Census Tract 62, Nueces County, Texas	48.8%
483550062002	Block Group 2, Census Tract 62, Nueces County, Texas	16.0%
483550062003	Block Group 3, Census Tract 62, Nueces County, Texas	13.2%
483550063001	Block Group 1, Census Tract 63, Nueces County, Texas	39.1%
483550063002	Block Group 2, Census Tract 63, Nueces County, Texas	45.8%
483550064001	Block Group 1, Census Tract 64, Nueces County, Texas	90.3%
483550064002	Block Group 2, Census Tract 64, Nueces County, Texas	62.2%
483550064003	Block Group 3, Census Tract 64, Nueces County, Texas	90.0%
483559800001	Block Group 1, Census Tract 9800, Nueces County, Texas	0.0%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483559900000	Block Group 0, Census Tract 9900, Nueces County, Texas	0.0%
483610202001	Block Group 1, Census Tract 202, Orange County, Texas	56.0%
483610202002	Block Group 2, Census Tract 202, Orange County, Texas	30.4%
483610202003	Block Group 3, Census Tract 202, Orange County, Texas	40.8%
483610202004	Block Group 4, Census Tract 202, Orange County, Texas	62.7%
483610203001	Block Group 1, Census Tract 203, Orange County, Texas	69.2%
483610203002	Block Group 2, Census Tract 203, Orange County, Texas	30.6%
483610203003	Block Group 3, Census Tract 203, Orange County, Texas	75.9%
483610205001	Block Group 1, Census Tract 205, Orange County, Texas	43.7%
483610205002	Block Group 2, Census Tract 205, Orange County, Texas	40.4%
483610205003	Block Group 3, Census Tract 205, Orange County, Texas	54.9%
483610205004	Block Group 4, Census Tract 205, Orange County, Texas	36.7%
483610207001	Block Group 1, Census Tract 207, Orange County, Texas	24.4%
483610207002	Block Group 2, Census Tract 207, Orange County, Texas	43.1%
483610207003	Block Group 3, Census Tract 207, Orange County, Texas	56.3%
483610207004	Block Group 4, Census Tract 207, Orange County, Texas	67.0%
483610208001	Block Group 1, Census Tract 208, Orange County, Texas	50.5%
483610208002	Block Group 2, Census Tract 208, Orange County, Texas	36.1%
483610209001	Block Group 1, Census Tract 209, Orange County, Texas	54.6%
483610209002	Block Group 2, Census Tract 209, Orange County, Texas	54.5%
483610209003	Block Group 3, Census Tract 209, Orange County, Texas	58.9%
483610209004	Block Group 4, Census Tract 209, Orange County, Texas	27.4%
483610210001	Block Group 1, Census Tract 210, Orange County, Texas	27.8%
483610211001	Block Group 1, Census Tract 211, Orange County, Texas	17.5%
483610212001	Block Group 1, Census Tract 212, Orange County, Texas	47.6%
483610212002	Block Group 2, Census Tract 212, Orange County, Texas	26.1%
483610212003	Block Group 3, Census Tract 212, Orange County, Texas	19.3%
483610213001	Block Group 1, Census Tract 213, Orange County, Texas	18.3%
483610213002	Block Group 2, Census Tract 213, Orange County, Texas	25.2%
483610213003	Block Group 3, Census Tract 213, Orange County, Texas	29.2%
483610214001	Block Group 1, Census Tract 214, Orange County, Texas	14.8%
483610214002	Block Group 2, Census Tract 214, Orange County, Texas	29.0%
483610215011	Block Group 1, Census Tract 215.01, Orange County, Texas	20.4%
483610215021	Block Group 1, Census Tract 215.02, Orange County, Texas	53.9%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483610215022	Block Group 2, Census Tract 215.02, Orange County, Texas	66.2%
483610215023	Block Group 3, Census Tract 215.02, Orange County, Texas	56.9%
483610215024	Block Group 4, Census Tract 215.02, Orange County, Texas	21.5%
483610215025	Block Group 5, Census Tract 215.02, Orange County, Texas	39.7%
483610216001	Block Group 1, Census Tract 216, Orange County, Texas	33.2%
483610216002	Block Group 2, Census Tract 216, Orange County, Texas	35.8%
483610216003	Block Group 3, Census Tract 216, Orange County, Texas	26.7%
483610217001	Block Group 1, Census Tract 217, Orange County, Texas	21.5%
483610217002	Block Group 2, Census Tract 217, Orange County, Texas	51.0%
483610218001	Block Group 1, Census Tract 218, Orange County, Texas	17.2%
483610218002	Block Group 2, Census Tract 218, Orange County, Texas	39.4%
483610219001	Block Group 1, Census Tract 219, Orange County, Texas	38.4%
483610219002	Block Group 2, Census Tract 219, Orange County, Texas	41.4%
483610219003	Block Group 3, Census Tract 219, Orange County, Texas	48.0%
483610219004	Block Group 4, Census Tract 219, Orange County, Texas	36.5%
483610219005	Block Group 5, Census Tract 219, Orange County, Texas	54.8%
483610219006	Block Group 6, Census Tract 219, Orange County, Texas	22.7%
483610220001	Block Group 1, Census Tract 220, Orange County, Texas	53.2%
483610220002	Block Group 2, Census Tract 220, Orange County, Texas	36.8%
483610220003	Block Group 3, Census Tract 220, Orange County, Texas	38.5%
483610222001	Block Group 1, Census Tract 222, Orange County, Texas	8.2%
483610222002	Block Group 2, Census Tract 222, Orange County, Texas	26.8%
483610223001	Block Group 1, Census Tract 223, Orange County, Texas	7.1%
483610223002	Block Group 2, Census Tract 223, Orange County, Texas	21.8%
483610223003	Block Group 3, Census Tract 223, Orange County, Texas	31.5%
483610223004	Block Group 4, Census Tract 223, Orange County, Texas	8.6%
483610223005	Block Group 5, Census Tract 223, Orange County, Texas	12.6%
483610224001	Block Group 1, Census Tract 224, Orange County, Texas	17.9%
483610224002	Block Group 2, Census Tract 224, Orange County, Texas	53.6%
483610224003	Block Group 3, Census Tract 224, Orange County, Texas	62.1%
483610224004	Block Group 4, Census Tract 224, Orange County, Texas	17.6%
483610224005	Block Group 5, Census Tract 224, Orange County, Texas	9.0%
483732101011	Block Group 1, Census Tract 2101.01, Polk County, Texas	39.3%
483732101012	Block Group 2, Census Tract 2101.01, Polk County, Texas	51.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483732101013	Block Group 3, Census Tract 2101.01, Polk County, Texas	37.8%
483732101021	Block Group 1, Census Tract 2101.02, Polk County, Texas	46.0%
483732101022	Block Group 2, Census Tract 2101.02, Polk County, Texas	35.9%
483732101023	Block Group 3, Census Tract 2101.02, Polk County, Texas	77.0%
483732101024	Block Group 4, Census Tract 2101.02, Polk County, Texas	42.7%
483732102031	Block Group 1, Census Tract 2102.03, Polk County, Texas	64.6%
483732102032	Block Group 2, Census Tract 2102.03, Polk County, Texas	56.1%
483732102041	Block Group 1, Census Tract 2102.04, Polk County, Texas	47.6%
483732102042	Block Group 2, Census Tract 2102.04, Polk County, Texas	74.5%
483732102043	Block Group 3, Census Tract 2102.04, Polk County, Texas	50.3%
483732102051	Block Group 1, Census Tract 2102.05, Polk County, Texas	52.6%
483732102052	Block Group 2, Census Tract 2102.05, Polk County, Texas	37.4%
483732102061	Block Group 1, Census Tract 2102.06, Polk County, Texas	56.4%
483732102062	Block Group 2, Census Tract 2102.06, Polk County, Texas	39.7%
483732102063	Block Group 3, Census Tract 2102.06, Polk County, Texas	21.7%
483732103011	Block Group 1, Census Tract 2103.01, Polk County, Texas	33.6%
483732103012	Block Group 2, Census Tract 2103.01, Polk County, Texas	66.7%
483732103013	Block Group 3, Census Tract 2103.01, Polk County, Texas	70.0%
483732103021	Block Group 1, Census Tract 2103.02, Polk County, Texas	46.9%
483732103022	Block Group 2, Census Tract 2103.02, Polk County, Texas	48.5%
483732103023	Block Group 3, Census Tract 2103.02, Polk County, Texas	79.0%
483732103024	Block Group 4, Census Tract 2103.02, Polk County, Texas	51.2%
483732104001	Block Group 1, Census Tract 2104, Polk County, Texas	57.9%
483732104002	Block Group 2, Census Tract 2104, Polk County, Texas	41.2%
483732104003	Block Group 3, Census Tract 2104, Polk County, Texas	47.1%
483732104004	Block Group 4, Census Tract 2104, Polk County, Texas	21.7%
483732105001	Block Group 1, Census Tract 2105, Polk County, Texas	58.6%
483732105002	Block Group 2, Census Tract 2105, Polk County, Texas	42.3%
483732105003	Block Group 3, Census Tract 2105, Polk County, Texas	52.0%
483919502001	Block Group 1, Census Tract 9502, Refugio County, Texas	18.8%
483919502002	Block Group 2, Census Tract 9502, Refugio County, Texas	30.2%
483919502003	Block Group 3, Census Tract 9502, Refugio County, Texas	66.7%
483919502004	Block Group 4, Census Tract 9502, Refugio County, Texas	72.6%
483919504001	Block Group 1, Census Tract 9504, Refugio County, Texas	24.4%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
483919504002	Block Group 2, Census Tract 9504, Refugio County, Texas	45.9%
483919504003	Block Group 3, Census Tract 9504, Refugio County, Texas	41.9%
483919504004	Block Group 4, Census Tract 9504, Refugio County, Texas	38.2%
484039501001	Block Group 1, Census Tract 9501, Sabine County, Texas	36.8%
484039501002	Block Group 2, Census Tract 9501, Sabine County, Texas	40.3%
484039502001	Block Group 1, Census Tract 9502, Sabine County, Texas	38.8%
484039502002	Block Group 2, Census Tract 9502, Sabine County, Texas	40.5%
484039502003	Block Group 3, Census Tract 9502, Sabine County, Texas	40.4%
484039503001	Block Group 1, Census Tract 9503, Sabine County, Texas	42.0%
484039503002	Block Group 2, Census Tract 9503, Sabine County, Texas	55.1%
484039503003	Block Group 3, Census Tract 9503, Sabine County, Texas	57.0%
484039503004	Block Group 4, Census Tract 9503, Sabine County, Texas	38.0%
484039503005	Block Group 5, Census Tract 9503, Sabine County, Texas	35.0%
484059501001	Block Group 1, Census Tract 9501, San Augustine County, Texas	40.0%
484059501002	Block Group 2, Census Tract 9501, San Augustine County, Texas	55.2%
484059501003	Block Group 3, Census Tract 9501, San Augustine County, Texas	35.4%
484059502001	Block Group 1, Census Tract 9502, San Augustine County, Texas	76.0%
484059502002	Block Group 2, Census Tract 9502, San Augustine County, Texas	81.9%
484059502003	Block Group 3, Census Tract 9502, San Augustine County, Texas	51.9%
484059503001	Block Group 1, Census Tract 9503, San Augustine County, Texas	30.3%
484059503002	Block Group 2, Census Tract 9503, San Augustine County, Texas	53.6%
484072001011	Block Group 1, Census Tract 2001.01, San Jacinto County, Texas	51.0%
484072001012	Block Group 2, Census Tract 2001.01, San Jacinto County, Texas	44.6%
484072001013	Block Group 3, Census Tract 2001.01, San Jacinto County, Texas	62.5%
484072001021	Block Group 1, Census Tract 2001.02, San Jacinto County, Texas	39.3%
484072001022	Block Group 2, Census Tract 2001.02, San Jacinto County, Texas	22.8%
484072001023	Block Group 3, Census Tract 2001.02, San Jacinto County, Texas	49.1%
484072001024	Block Group 4, Census Tract 2001.02, San Jacinto County, Texas	19.1%
484072001025	Block Group 5, Census Tract 2001.02, San Jacinto County, Texas	57.9%
484072002001	Block Group 1, Census Tract 2002, San Jacinto County, Texas	32.3%
484072002002	Block Group 2, Census Tract 2002, San Jacinto County, Texas	52.8%
484072002003	Block Group 3, Census Tract 2002, San Jacinto County, Texas	58.3%
484072003001	Block Group 1, Census Tract 2003, San Jacinto County, Texas	40.9%
484072003002	Block Group 2, Census Tract 2003, San Jacinto County, Texas	52.0%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484072003003	Block Group 3, Census Tract 2003, San Jacinto County, Texas	50.9%
484072003004	Block Group 4, Census Tract 2003, San Jacinto County, Texas	19.4%
484090102011	Block Group 1, Census Tract 102.01, San Patricio County, Texas	35.2%
484090102012	Block Group 2, Census Tract 102.01, San Patricio County, Texas	46.3%
484090102013	Block Group 3, Census Tract 102.01, San Patricio County, Texas	45.4%
484090102021	Block Group 1, Census Tract 102.02, San Patricio County, Texas	73.0%
484090102022	Block Group 2, Census Tract 102.02, San Patricio County, Texas	42.2%
484090102023	Block Group 3, Census Tract 102.02, San Patricio County, Texas	29.5%
484090103011	Block Group 1, Census Tract 103.01, San Patricio County, Texas	30.7%
484090103012	Block Group 2, Census Tract 103.01, San Patricio County, Texas	26.2%
484090103013	Block Group 3, Census Tract 103.01, San Patricio County, Texas	26.3%
484090103021	Block Group 1, Census Tract 103.02, San Patricio County, Texas	23.6%
484090103022	Block Group 2, Census Tract 103.02, San Patricio County, Texas	16.6%
484090103023	Block Group 3, Census Tract 103.02, San Patricio County, Texas	60.0%
484090105001	Block Group 1, Census Tract 105, San Patricio County, Texas	52.4%
484090105002	Block Group 2, Census Tract 105, San Patricio County, Texas	56.6%
484090106011	Block Group 1, Census Tract 106.01, San Patricio County, Texas	41.9%
484090106012	Block Group 2, Census Tract 106.01, San Patricio County, Texas	26.7%
484090106013	Block Group 3, Census Tract 106.01, San Patricio County, Texas	10.3%
484090106014	Block Group 4, Census Tract 106.01, San Patricio County, Texas	19.3%
484090106021	Block Group 1, Census Tract 106.02, San Patricio County, Texas	20.1%
484090106022	Block Group 2, Census Tract 106.02, San Patricio County, Texas	34.1%
484090106031	Block Group 1, Census Tract 106.03, San Patricio County, Texas	13.6%
484090106041	Block Group 1, Census Tract 106.04, San Patricio County, Texas	25.3%
484090106042	Block Group 2, Census Tract 106.04, San Patricio County, Texas	16.1%
484090107001	Block Group 1, Census Tract 107, San Patricio County, Texas	18.8%
484090107002	Block Group 2, Census Tract 107, San Patricio County, Texas	14.9%
484090108001	Block Group 1, Census Tract 108, San Patricio County, Texas	41.9%
484090108002	Block Group 2, Census Tract 108, San Patricio County, Texas	18.0%
484090108003	Block Group 3, Census Tract 108, San Patricio County, Texas	44.8%
484090108004	Block Group 4, Census Tract 108, San Patricio County, Texas	47.8%
484090109001	Block Group 1, Census Tract 109, San Patricio County, Texas	32.3%
484090109002	Block Group 2, Census Tract 109, San Patricio County, Texas	22.9%
484090109003	Block Group 3, Census Tract 109, San Patricio County, Texas	36.2%



Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484090110001	Block Group 1, Census Tract 110, San Patricio County, Texas	45.8%
484090110002	Block Group 2, Census Tract 110, San Patricio County, Texas	54.3%
484090110003	Block Group 3, Census Tract 110, San Patricio County, Texas	29.5%
484090110004	Block Group 4, Census Tract 110, San Patricio County, Texas	71.7%
484090111001	Block Group 1, Census Tract 111, San Patricio County, Texas	22.4%
484090111002	Block Group 2, Census Tract 111, San Patricio County, Texas	29.0%
484090111003	Block Group 3, Census Tract 111, San Patricio County, Texas	40.6%
484090112001	Block Group 1, Census Tract 112, San Patricio County, Texas	19.4%
484090112002	Block Group 2, Census Tract 112, San Patricio County, Texas	48.4%
484090112003	Block Group 3, Census Tract 112, San Patricio County, Texas	34.2%
484090113001	Block Group 1, Census Tract 113, San Patricio County, Texas	63.3%
484090113002	Block Group 2, Census Tract 113, San Patricio County, Texas	58.9%
484090113003	Block Group 3, Census Tract 113, San Patricio County, Texas	61.6%
484579501001	Block Group 1, Census Tract 9501, Tyler County, Texas	57.3%
484579501002	Block Group 2, Census Tract 9501, Tyler County, Texas	45.5%
484579501003	Block Group 3, Census Tract 9501, Tyler County, Texas	43.1%
484579502001	Block Group 1, Census Tract 9502, Tyler County, Texas	58.6%
484579502002	Block Group 2, Census Tract 9502, Tyler County, Texas	44.9%
484579502003	Block Group 3, Census Tract 9502, Tyler County, Texas	63.1%
484579502004	Block Group 4, Census Tract 9502, Tyler County, Texas	26.3%
484579502005	Block Group 5, Census Tract 9502, Tyler County, Texas	25.7%
484579503001	Block Group 1, Census Tract 9503, Tyler County, Texas	36.5%
484579503002	Block Group 2, Census Tract 9503, Tyler County, Texas	70.7%
484579504001	Block Group 1, Census Tract 9504, Tyler County, Texas	52.1%
484579504002	Block Group 2, Census Tract 9504, Tyler County, Texas	44.1%
484579504003	Block Group 3, Census Tract 9504, Tyler County, Texas	44.8%
484579504004	Block Group 4, Census Tract 9504, Tyler County, Texas	33.7%
484579505001	Block Group 1, Census Tract 9505, Tyler County, Texas	34.8%
484579505002	Block Group 2, Census Tract 9505, Tyler County, Texas	51.6%
484690001001	Block Group 1, Census Tract 1, Victoria County, Texas	42.0%
484690001002	Block Group 2, Census Tract 1, Victoria County, Texas	42.8%
484690002011	Block Group 1, Census Tract 2.01, Victoria County, Texas	66.0%
484690002012	Block Group 2, Census Tract 2.01, Victoria County, Texas	79.3%
484690002013	Block Group 3, Census Tract 2.01, Victoria County, Texas	50.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484690002021	Block Group 1, Census Tract 2.02, Victoria County, Texas	71.2%
484690002022	Block Group 2, Census Tract 2.02, Victoria County, Texas	69.2%
484690002023	Block Group 3, Census Tract 2.02, Victoria County, Texas	32.6%
484690003011	Block Group 1, Census Tract 3.01, Victoria County, Texas	74.1%
484690003012	Block Group 2, Census Tract 3.01, Victoria County, Texas	93.2%
484690003021	Block Group 1, Census Tract 3.02, Victoria County, Texas	77.6%
484690003022	Block Group 2, Census Tract 3.02, Victoria County, Texas	52.0%
484690004001	Block Group 1, Census Tract 4, Victoria County, Texas	53.1%
484690004002	Block Group 2, Census Tract 4, Victoria County, Texas	6.2%
484690005011	Block Group 1, Census Tract 5.01, Victoria County, Texas	41.9%
484690005012	Block Group 2, Census Tract 5.01, Victoria County, Texas	66.1%
484690005013	Block Group 3, Census Tract 5.01, Victoria County, Texas	44.7%
484690005021	Block Group 1, Census Tract 5.02, Victoria County, Texas	77.1%
484690005022	Block Group 2, Census Tract 5.02, Victoria County, Texas	46.1%
484690005023	Block Group 3, Census Tract 5.02, Victoria County, Texas	12.1%
484690006011	Block Group 1, Census Tract 6.01, Victoria County, Texas	57.3%
484690006012	Block Group 2, Census Tract 6.01, Victoria County, Texas	38.9%
484690006013	Block Group 3, Census Tract 6.01, Victoria County, Texas	55.8%
484690006021	Block Group 1, Census Tract 6.02, Victoria County, Texas	62.9%
484690006022	Block Group 2, Census Tract 6.02, Victoria County, Texas	38.0%
484690006023	Block Group 3, Census Tract 6.02, Victoria County, Texas	23.3%
484690006024	Block Group 4, Census Tract 6.02, Victoria County, Texas	79.5%
484690007001	Block Group 1, Census Tract 7, Victoria County, Texas	53.2%
484690007002	Block Group 2, Census Tract 7, Victoria County, Texas	46.7%
484690007003	Block Group 3, Census Tract 7, Victoria County, Texas	35.0%
484690008001	Block Group 1, Census Tract 8, Victoria County, Texas	23.7%
484690008002	Block Group 2, Census Tract 8, Victoria County, Texas	33.1%
484690013001	Block Group 1, Census Tract 13, Victoria County, Texas	36.4%
484690013002	Block Group 2, Census Tract 13, Victoria County, Texas	45.1%
484690014001	Block Group 1, Census Tract 14, Victoria County, Texas	29.1%
484690014002	Block Group 2, Census Tract 14, Victoria County, Texas	28.4%
484690014003	Block Group 3, Census Tract 14, Victoria County, Texas	28.1%
484690014004	Block Group 4, Census Tract 14, Victoria County, Texas	15.4%
484690015011	Block Group 1, Census Tract 15.01, Victoria County, Texas	22.5%

Disaster Recovery Supplements

<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484690015012	Block Group 2, Census Tract 15.01, Victoria County, Texas	12.0%
484690015013	Block Group 3, Census Tract 15.01, Victoria County, Texas	18.3%
484690015031	Block Group 1, Census Tract 15.03, Victoria County, Texas	14.8%
484690015032	Block Group 2, Census Tract 15.03, Victoria County, Texas	0.0%
484690015041	Block Group 1, Census Tract 15.04, Victoria County, Texas	18.8%
484690015042	Block Group 2, Census Tract 15.04, Victoria County, Texas	24.7%
484690015043	Block Group 3, Census Tract 15.04, Victoria County, Texas	13.5%
484690016011	Block Group 1, Census Tract 16.01, Victoria County, Texas	65.9%
484690016012	Block Group 2, Census Tract 16.01, Victoria County, Texas	17.2%
484690016013	Block Group 3, Census Tract 16.01, Victoria County, Texas	14.0%
484690016014	Block Group 4, Census Tract 16.01, Victoria County, Texas	61.2%
484690016041	Block Group 1, Census Tract 16.04, Victoria County, Texas	52.5%
484690016042	Block Group 2, Census Tract 16.04, Victoria County, Texas	13.9%
484690016043	Block Group 3, Census Tract 16.04, Victoria County, Texas	47.7%
484690016051	Block Group 1, Census Tract 16.05, Victoria County, Texas	21.0%
484690016052	Block Group 2, Census Tract 16.05, Victoria County, Texas	40.8%
484690016053	Block Group 3, Census Tract 16.05, Victoria County, Texas	57.7%
484690016061	Block Group 1, Census Tract 16.06, Victoria County, Texas	10.4%
484690016062	Block Group 2, Census Tract 16.06, Victoria County, Texas	32.6%
484690016063	Block Group 3, Census Tract 16.06, Victoria County, Texas	11.5%
484690016064	Block Group 4, Census Tract 16.06, Victoria County, Texas	4.0%
484690017001	Block Group 1, Census Tract 17, Victoria County, Texas	32.9%
484690017002	Block Group 2, Census Tract 17, Victoria County, Texas	18.6%
484690017003	Block Group 3, Census Tract 17, Victoria County, Texas	74.4%
484690017004	Block Group 4, Census Tract 17, Victoria County, Texas	47.7%
484699800001	Block Group 1, Census Tract 9800, Victoria County, Texas	0.0%
484717901011	Block Group 1, Census Tract 7901.01, Walker County, Texas	73.7%
484717901012	Block Group 2, Census Tract 7901.01, Walker County, Texas	0.0%
484717901013	Block Group 3, Census Tract 7901.01, Walker County, Texas	34.3%
484717901021	Block Group 1, Census Tract 7901.02, Walker County, Texas	48.5%
484717901022	Block Group 2, Census Tract 7901.02, Walker County, Texas	27.0%
484717901031	Block Group 1, Census Tract 7901.03, Walker County, Texas	27.7%
484717901032	Block Group 2, Census Tract 7901.03, Walker County, Texas	33.5%
484717901033	Block Group 3, Census Tract 7901.03, Walker County, Texas	45.7%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484717902001	Block Group 1, Census Tract 7902, Walker County, Texas	28.4%
484717902002	Block Group 2, Census Tract 7902, Walker County, Texas	67.2%
484717902003	Block Group 3, Census Tract 7902, Walker County, Texas	25.2%
484717902004	Block Group 4, Census Tract 7902, Walker County, Texas	36.2%
484717902005	Block Group 5, Census Tract 7902, Walker County, Texas	35.5%
484717903001	Block Group 1, Census Tract 7903, Walker County, Texas	39.8%
484717903002	Block Group 2, Census Tract 7903, Walker County, Texas	50.0%
484717903003	Block Group 3, Census Tract 7903, Walker County, Texas	19.2%
484717903004	Block Group 4, Census Tract 7903, Walker County, Texas	25.8%
484717903005	Block Group 5, Census Tract 7903, Walker County, Texas	11.6%
484717904001	Block Group 1, Census Tract 7904, Walker County, Texas	54.7%
484717904002	Block Group 2, Census Tract 7904, Walker County, Texas	0.0%
484717904003	Block Group 3, Census Tract 7904, Walker County, Texas	0.0%
484717904004	Block Group 4, Census Tract 7904, Walker County, Texas	32.4%
484717905001	Block Group 1, Census Tract 7905, Walker County, Texas	100.0%
484717905002	Block Group 2, Census Tract 7905, Walker County, Texas	66.9%
484717905003	Block Group 3, Census Tract 7905, Walker County, Texas	38.7%
484717905004	Block Group 4, Census Tract 7905, Walker County, Texas	31.9%
484717906001	Block Group 1, Census Tract 7906, Walker County, Texas	81.4%
484717906002	Block Group 2, Census Tract 7906, Walker County, Texas	68.4%
484717906003	Block Group 3, Census Tract 7906, Walker County, Texas	0.0%
484717906004	Block Group 4, Census Tract 7906, Walker County, Texas	84.6%
484717907001	Block Group 1, Census Tract 7907, Walker County, Texas	64.3%
484717907002	Block Group 2, Census Tract 7907, Walker County, Texas	90.9%
484717907003	Block Group 3, Census Tract 7907, Walker County, Texas	77.8%
484717907004	Block Group 4, Census Tract 7907, Walker County, Texas	35.4%
484717908001	Block Group 1, Census Tract 7908, Walker County, Texas	100.0%
484717908002	Block Group 2, Census Tract 7908, Walker County, Texas	84.7%
484717908003	Block Group 3, Census Tract 7908, Walker County, Texas	47.9%
484717908004	Block Group 4, Census Tract 7908, Walker County, Texas	30.7%
484736801001	Block Group 1, Census Tract 6801, Waller County, Texas	25.9%
484736802001	Block Group 1, Census Tract 6802, Waller County, Texas	48.3%
484736802002	Block Group 2, Census Tract 6802, Waller County, Texas	48.5%
484736802003	Block Group 3, Census Tract 6802, Waller County, Texas	58.0%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484736802004	Block Group 4, Census Tract 6802, Waller County, Texas	65.4%
484736803001	Block Group 1, Census Tract 6803, Waller County, Texas	24.8%
484736803002	Block Group 2, Census Tract 6803, Waller County, Texas	62.7%
484736803003	Block Group 3, Census Tract 6803, Waller County, Texas	52.9%
484736803004	Block Group 4, Census Tract 6803, Waller County, Texas	33.0%
484736803005	Block Group 5, Census Tract 6803, Waller County, Texas	81.2%
484736804001	Block Group 1, Census Tract 6804, Waller County, Texas	0.0%
484736805001	Block Group 1, Census Tract 6805, Waller County, Texas	43.0%
484736805002	Block Group 2, Census Tract 6805, Waller County, Texas	56.2%
484736805003	Block Group 3, Census Tract 6805, Waller County, Texas	63.4%
484736805004	Block Group 4, Census Tract 6805, Waller County, Texas	62.8%
484736805005	Block Group 5, Census Tract 6805, Waller County, Texas	46.4%
484736806001	Block Group 1, Census Tract 6806, Waller County, Texas	49.2%
484736806002	Block Group 2, Census Tract 6806, Waller County, Texas	36.6%
484736806003	Block Group 3, Census Tract 6806, Waller County, Texas	29.6%
484771701001	Block Group 1, Census Tract 1701, Washington County, Texas	63.1%
484771701002	Block Group 2, Census Tract 1701, Washington County, Texas	60.6%
484771701003	Block Group 3, Census Tract 1701, Washington County, Texas	25.2%
484771702001	Block Group 1, Census Tract 1702, Washington County, Texas	80.0%
484771702002	Block Group 2, Census Tract 1702, Washington County, Texas	59.7%
484771702003	Block Group 3, Census Tract 1702, Washington County, Texas	62.7%
484771702004	Block Group 4, Census Tract 1702, Washington County, Texas	23.6%
484771703001	Block Group 1, Census Tract 1703, Washington County, Texas	42.8%
484771703002	Block Group 2, Census Tract 1703, Washington County, Texas	25.9%
484771703003	Block Group 3, Census Tract 1703, Washington County, Texas	65.0%
484771704001	Block Group 1, Census Tract 1704, Washington County, Texas	92.2%
484771704002	Block Group 2, Census Tract 1704, Washington County, Texas	39.2%
484771704003	Block Group 3, Census Tract 1704, Washington County, Texas	26.0%
484771704004	Block Group 4, Census Tract 1704, Washington County, Texas	39.7%
484771705001	Block Group 1, Census Tract 1705, Washington County, Texas	43.7%
484771705002	Block Group 2, Census Tract 1705, Washington County, Texas	16.9%
484771705003	Block Group 3, Census Tract 1705, Washington County, Texas	55.1%
484771705004	Block Group 4, Census Tract 1705, Washington County, Texas	32.5%
484771705005	Block Group 5, Census Tract 1705, Washington County, Texas	45.6%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484771705006	Block Group 6, Census Tract 1705, Washington County, Texas	21.9%
484771706001	Block Group 1, Census Tract 1706, Washington County, Texas	55.7%
484771706002	Block Group 2, Census Tract 1706, Washington County, Texas	37.5%
484771706003	Block Group 3, Census Tract 1706, Washington County, Texas	50.9%
484771706004	Block Group 4, Census Tract 1706, Washington County, Texas	25.7%
484817401001	Block Group 1, Census Tract 7401, Wharton County, Texas	30.9%
484817401002	Block Group 2, Census Tract 7401, Wharton County, Texas	31.0%
484817401003	Block Group 3, Census Tract 7401, Wharton County, Texas	20.2%
484817401004	Block Group 4, Census Tract 7401, Wharton County, Texas	36.6%
484817401005	Block Group 5, Census Tract 7401, Wharton County, Texas	26.8%
484817402001	Block Group 1, Census Tract 7402, Wharton County, Texas	53.3%
484817402002	Block Group 2, Census Tract 7402, Wharton County, Texas	54.5%
484817403001	Block Group 1, Census Tract 7403, Wharton County, Texas	59.7%
484817403002	Block Group 2, Census Tract 7403, Wharton County, Texas	16.1%
484817404001	Block Group 1, Census Tract 7404, Wharton County, Texas	28.5%
484817404002	Block Group 2, Census Tract 7404, Wharton County, Texas	42.9%
484817404003	Block Group 3, Census Tract 7404, Wharton County, Texas	65.9%
484817404004	Block Group 4, Census Tract 7404, Wharton County, Texas	53.5%
484817404005	Block Group 5, Census Tract 7404, Wharton County, Texas	37.0%
484817404006	Block Group 6, Census Tract 7404, Wharton County, Texas	33.9%
484817405001	Block Group 1, Census Tract 7405, Wharton County, Texas	41.0%
484817405002	Block Group 2, Census Tract 7405, Wharton County, Texas	69.7%
484817406001	Block Group 1, Census Tract 7406, Wharton County, Texas	47.3%
484817406002	Block Group 2, Census Tract 7406, Wharton County, Texas	44.2%
484817406003	Block Group 3, Census Tract 7406, Wharton County, Texas	42.8%
484817407001	Block Group 1, Census Tract 7407, Wharton County, Texas	56.6%
484817408001	Block Group 1, Census Tract 7408, Wharton County, Texas	28.2%
484817408002	Block Group 2, Census Tract 7408, Wharton County, Texas	44.2%
484817408003	Block Group 3, Census Tract 7408, Wharton County, Texas	57.2%
484817409001	Block Group 1, Census Tract 7409, Wharton County, Texas	41.6%
484817409002	Block Group 2, Census Tract 7409, Wharton County, Texas	45.9%
484817409003	Block Group 3, Census Tract 7409, Wharton County, Texas	13.6%
484817409004	Block Group 4, Census Tract 7409, Wharton County, Texas	10.6%
484817409005	Block Group 5, Census Tract 7409, Wharton County, Texas	23.8%

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<b>FIPS Code</b>	<b>Block Group</b>	<b>Percent of Block Group Low or Moderate Income</b>
484817410001	Block Group 1, Census Tract 7410, Wharton County, Texas	77.0%
484817410002	Block Group 2, Census Tract 7410, Wharton County, Texas	54.6%
484817410003	Block Group 3, Census Tract 7410, Wharton County, Texas	26.1%
484817410004	Block Group 4, Census Tract 7410, Wharton County, Texas	34.5%
484817411001	Block Group 1, Census Tract 7411, Wharton County, Texas	35.5%
484817411002	Block Group 2, Census Tract 7411, Wharton County, Texas	28.4%

Source: United States Department of Housing and Urban Development, Low and Moderate Income Summary Data, 2017.

<<https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/>>

## Appendix K - TDHCA Fair Housing Action Steps by Impediment

### Impediment 1 Not in My Backyard Syndrome (NIMBYism) can create barriers to housing choice for protected classes in some communities.

Action Step ID	<b>8 Expansion of Ineligible Adverse Site and Area Characteristics in Multifamily Activities</b>		
Begin Date:	7/1/2013 COMPLETED - 11/15/2013	Multifamily	<b>H</b>
Summary	To improve the siting of affordable accessible housing, in 2013 the criteria for what constituted site ineligibility characteristics were expanded. The rule covered proximity to ineligible neighborhood features including blight, high crime, heavy industrial facilities, and other characteristics in the area which may not be appropriate for residential development. The rule required disclosure of such features for any multifamily applications for funding rehabilitation of an existing property or new construction. The rule resulted in improved neighborhood conditions or appropriate mitigation measures for tenants. These criteria are evaluated annually and updated as needed.		
Action Step ID	<b>11 Development of a Multifamily Primer</b>		
Begin Date:	10/29/2013 COMPLETED - 10/14/2014	Multifamily	
Summary	A Multifamily Primer was developed to improve materials available to combat NIMBYism, to provide clearer information on opportunities for meaningful and substantive input regarding the development of affordable housing, and to meet the needs of the public, advocacy groups, elected officials, and local governments in understanding Multifamily programs offered by the Department (particularly the Housing Tax Credit program). TDHCA contracted with the University of Houston to develop a lay person's guide to Multifamily housing and local community involvement. The primer is available at: <a href="http://www/fair-housing/docs/Housing_Options_Web.pdf">http://www/fair-housing/docs/Housing_Options_Web.pdf</a> .		
Action Step ID	<b>28 TDHCA Presentation at TxAPA Conference on Zoning Laws and Best Practices for Fair Housing</b>		
Begin Date:	7/1/2014 COMPLETED - 10/16/2014	Agency Wide	<b>H</b>
Summary	TDHCA appeared as a speaker along with representatives from Coats Rose and the City of Buda at the Texas American Planning Association (TxAPA) Conference in Frisco, TX on October 16, 2014. The panel discussion included topics such as recent legal actions related to zoning, a city representative's perspective on the Housing Tax Credit program, how to engage with the public, and a general discussion of zoning best practices.		
Action Step ID	<b>31 Publication of a Fair Housing Article in the Texas Municipal League Newsletter</b>		
Begin Date:	7/1/2014 COMPLETED - 9/15/2014	Multifamily	<b>H</b>
Summary	In order to disseminate information to local elected official and government employees on affordable housing development and to make efforts to minimize NIMBYism, the Department's Executive Director at the time, Timothy Irvine, drafted an article for the		



TDHCA Fair Housing Action Steps by Impediment

Texas Municipal League's newsletter that provided local governments with important information about affordable housing developments. The article was published on September 14, 2014.

Action Step ID **60 Qualified Allocation Plan Provisions to Ensure Incentives for Local Community Support or Opposition are Consistent with Fair Housing Objectives**

Begin Date: 9/12/2012 COMPLETED - 1/1/2013 Multifamily

Summary Provisions were added in Section 11.9(d) of the 2013 QAP, relating to community engagement, to advise community organizations and local governments to consider Fair Housing laws, Fair Housing Activity Statement—Texas (FHAAT) forms, current Analysis of Impediment documents in local jurisdictions, one year action plans, and five year consolidated plans when generating opposition or support documents.

Action Step ID **71 Qualified Allocation Plan (QAP) Quantifiable Community Participation Provisions**

Begin Date: 1/4/2004 COMPLETED - 1/1/2013 Multifamily

Summary The 2013 QAP includes provisions in Section 11.9(4)(D), relating to Quantifiable Community Participation, that include the highest point incentives for explicit support or neutrality from a Neighborhood Organization that during at least one of three prior Application Rounds provided a written statement that qualified as Quantifiable Community Participation opposing any Competitive Housing Tax Credit Application and whose boundaries remain unchanged. These provisions assist TDHCA in incentivizing development in communities which have been historically opposed to affordable housing but have changed their

Action Step ID **94 Creation of an Affordable Housing Presentation for Housing Tax Credit (HTC) Public Hearings**

Begin Date: 4/1/2014 COMPLETED - 12/31/2014 Multifamily

Summary Staff in the Multifamily Division created a short video to be shown at the beginning of HTC public forums during the tax credit cycle that could be used to address common questions and concerns about affordable housing, particularly those that may be construed as NIMBYism. The presentation premiered during the 2014 cycle and is available on the multifamily division website and can be used and viewed by local government officials, communities, and developers in addressing common questions and

Action Step ID **132 Housing and Services Partnership Academy Hosted by Housing and Health Services Coordination Council (HHSCC)**

Begin Date: 8/1/2014 COMPLETED - 2/10/2016 Agency Wide H

Summary Department staff coordinated the Housing and Services Partnership Academy to promote Service Enriched Housing (SEH) in Texas. SEH is defined as integrated, affordable, and accessible housing that provides residents with the opportunity to receive on-site or off-site health-related and other services and supports that foster independence in living and decision-making for individuals with disabilities and persons who are elderly. The academy consisted of teams throughout the state including persons with disabilities, public housing authorities, local governments, developers, centers for independent living, and faith based organizations. The topics addressed in the academy included a tenant/consumer panel; an overview of new construction and rehabilitation development processes; identifying and securing existing units for SEH; round table sessions on housing and

## TDHCA Fair Housing Action Steps by Impediment

services programs; peer presentations; and team planning sessions.

## TDHCA Fair Housing Action Steps by Impediment

**Action Step ID 169 Fair Housing Ad in Texas Affiliation of Affordable Housing Providers (TAAHP) Publication**

Begin Date: 4/1/2016 COMPLETED - 6/3/2016 Agency Wide **H**

Summary TDHCA's Division of Policy and Public Affairs ran an ad in the 2016 TAAHP annual conference program. The fair housing tagline brings attention to the Department's commitment to fair housing efforts and the importance of fair housing choice.

**Action Step ID 175 Reasonable Accommodation Rule Change**

Begin Date: 5/13/2016 COMPLETED - 12/15/2016 Agency Wide **H**

Summary Staff proposed a rule change to 10 TAC Chapter 1, Subchapter B, Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act. The revisions were proposed to clarify requirements related to accessibility standards and reasonable accommodations to ensure persons with disabilities have full and equal access to programs. The rule changes require responses to a reasonable accommodation request within a reasonable amount of time, not to exceed 14 calendar days. The response must either grant the request, deny the request, offer alternatives to the request, or request additional information to clarify the Reasonable Accommodation request. The proposed rule changes was presented at the July 28, 2016, TDHCA board meeting. Staff withdrew the proposed amendments at the August 25, 2016, TDHCA board meeting to incorporate new guidance from the Department of Justice. The proposed amendments were taken back to the board at the October 13, 2016, TDHCA board meeting. The Board approved the final rule at the December 15, 2016 board meeting. (It should be noted that since this time, further revisions to this rule have been initiated.)

**Action Step ID 176 Affordable and Fair Housing Article Submitted to Texas Impact, Better Neighborhoods Newsletter**

Begin Date: 5/13/2016 COMPLETED - 6/10/2016 Agency Wide **H**

Summary TDHCA submitted an article to Texas Impact, Better Neighbors newsletter project on affordable and fair housing in Texas. The monthly publication partners with state agencies and programs to provide information and policy implementation opportunities surrounding different issues in Texas to faith communities across the state. The article provided more information on affordable housing programs and opportunities in Texas.

**Action Step ID 194 Creation of a Language Assistance Webpage**

Begin Date: 6/1/2016 COMPLETED - 9/29/2016 Agency Wide **H**

Summary The Language Assistance Webpage was created. The webpage details how persons who are not able to speak, read, write or understand the English language may request translation assistance with documents, events or other information from the Texas Department of Housing and Community Affairs. The webpage includes translations for the top 25 languages spoken by income-eligible households with limited English Proficiency in Texas. For assistance households may call the agency's language service and utilize an interpreter to speak with TDHCA staff. A link to languages is available on critical pages for beneficiaries such as Help for Texans, Public Comment Center, Public Complaint Process, Fair Housing pages, Disaster Relief Resources, Income and Rent Limits, Section 8, Texas Homeownership, and Section 811.

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **205 Waiver Request, Fair Market Rents**

Begin Date: 2/21/2017 COMPLETED - 12/31/2017

Single Family **H**

Summary The Department is researching the need for an expansion of HUD’s waiver of Fair Market Rents (FMRs) in certain counties for 2017 Emergency Solutions Grant (ESG) Subrecipients. A waiver was previously granted by HUD for certain counties for 2016 ESG Subrecipients. The necessity to request a new waiver in certain areas of the state for certain ESG activities may be supported if it is determined that services cannot be provided under the regulatory limitations.

Action Step ID **219 Creation of a Best Practices Guide to Affirmative Marketing for Multifamily Developments**

Begin Date: 4/21/2017 COMPLETED - 6/28/2017

Multifamily **H**

Summary Fair housing staff created a best practices guide to affirmative marketing for the Department’s multifamily developments to comply with Department Rules. The document provides specific guidance on affirmatively marketing to least likely to apply populations as defined by race, ethnicity, and disability status.

Action Step ID **220 Submittal of Proposal for Presentation on Fair Housing Considerations for Cities at Texas Municipal League (TML)**

Begin Date: 1/15/2017 COMPLETED - 7/3/2017

Agency Wide **H**

Summary Fair Housing staff submitted a proposal to the Texas Municipal League entitled, Fair Housing Considerations for Cities. The presentation was to include an overview of multifamily housing financing, fair housing and the role of local jurisdictions in promoting choice and opportunity. Staff planned to cover recent case studies on fair housing determinations relative to local decision-making. The proposal was not accepted.

Action Step ID **221 Submittal of Proposal for Presentation on Fair Housing to County Judges and Commissioners Association of Texas (CJCAT)**

Begin Date: 4/1/2017 COMPLETED - 7/3/2017

Agency Wide **H**

Summary Fair Housing staff submitted a conference proposal to the County Judges and Commissioners Association of Texas entitled Fair Housing Considerations for Counties. The proposal included an overview of financing options and local decision-making considerations that affect those financing options (letters of support, local financing, NIMBYism) under the Fair Housing Act. The proposal was not accepted.

Action Step ID **241 TDHCA Single Family Affirmative Marketing Plan Form**

Begin Date: 3/2/2018 COMPLETED - 3/2/2018

Single Family **H**

Summary The Department created an easy-to-use form for administrators to use when building and submitting their single family affirmative marketing plans to the Department. The form is an available option for Administrators. Per 10 Texas Administrative Code § 20.9(b)(1) Administrators must use HUD Form 935.2B, the form on the Department's website, or create an equivalent Affirmative Fair Housing Marketing Plan. The form includes links to the applicable section of the Title 10 of the Texas

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **258 Undesirable Neighborhood Characteristics for the 2018 Uniform Multifamily Rules**

Begin Date: 6/1/2017 COMPLETED - 1/3/2018

Multifamily

Summary Applicants must disclose the presence of undesirable neighborhood characteristics, per 10 Texas Administrative Code § 10.101(a)(3). Undesirable neighborhood characteristics include high poverty rates (above 40 percent for individuals or 55 percent for Developments in regions 11 and 13), violent crime rate greater than 18 per 1,000 persons, proximity to vacant or blighted structures, and schools that do not have a Met Standard rating. In order to be considered as an eligible site despite the presence of such undesirable neighborhood characteristic, an applicant must demonstrate actions being taken that would lead a reader to conclude that there is a high probability and reasonable expectation the undesirable characteristic will be sufficiently mitigated or significantly improved within a reasonable time, typically prior to placement in service, and that the undesirable characteristic demonstrates a positive trend and continued improvement.

**Impediment 2 - There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements an**

Action Step ID	<b>4 Redevelopment of TDHCA Fair Housing Website</b>		
Begin Date:	6/11/2014 COMPLETED - 10/9/2014	Agency Wide	<b>H</b>
Summary	<p>This activity involved improving awareness and availability of information through the redevelopment of the TDHCA Fair Housing website to improve fair housing complaint direction, increase fair housing training and knowledge across the state, and provide toolkits and information resources specific to renters, homebuyers, development owners and administrators, real estate professionals, local governments, and elected officials. New website sections were created such as a survey, news corner, and a listing of Texas Fair Housing events. Renter and homebuyer information includes fair housing and reasonable accommodations rights information, unbanked resident toolkits for building credit, information on how to find affordable rental housing, and landlord-tenant toolkits and brochures. Development owners, administrators, and real estate professionals will find best policy guidance, rules information, and sample forms and documents. Local governments and elected officials will find information on zoning best practices as suggested in the Phase 2 Analysis of Impediments (AI). While this activity was reported as completed, the website continues to be updated and augmented.</p>		
Action Step ID	<b>6 Austin Area Meeting on the Adoption of a City Ordinance relating to Source of Income as a Protected Class</b>		
Begin Date:	6/4/2014 COMPLETED - 6/4/2014	Agency Wide	<b>H</b>
Summary	<p>To expand staff knowledge and serve as a resource, Fair Housing Team staff participated in a City of Austin meeting discussing a proposed ordinance to include source of income as a protected class. The ordinance would extend City of Austin fair housing protections to Section 8 Housing Choice voucher holders and other subsidy program recipients.</p>		
Action Step ID	<b>9 Review and Revision of TDHCA's Language Assistance Plan</b>		
Begin Date:	4/22/2014 COMPLETED - 8/1/2014	Agency Wide	<b>H</b>
Summary	<p>The Language Assistance Plan was completed and will be periodically revisited. In February 2015, TDHCA secured two contracts for third party interpretation and translation services - one for Spanish language services, and one for all other languages. The agency will roll out translated documents and resources as deemed necessary in the Language Access Plan.</p>		
Action Step ID	<b>10 Housing and Health Services Coordination Council (HHSCC) and TDHCA Creation of Rental Assistance Video Series</b>		
Begin Date:	COMPLETED - 9/26/2014	Agency Wide	<b>H</b>
Summary	<p>To improve the availability of information, the HHSCC and TDHCA collaborated on a short video series to educate the public on fair housing (including reasonable accommodations), homebuyer assistance, rental assistance, energy assistance, home repair, emergency assistance, and service enriched housing. The short video series is available on TDHCA's website and is used to engage and inform the public. From March 2015 to March 2017 there were nearly 1,000 page views on TDHCA's webpage with the video series.</p>		

TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>11 Development of a Multifamily Primer</b>		
Begin Date:	10/29/2013 COMPLETED - 10/14/2014	Multifamily	
Summary	A Multifamily Primer was developed to improve materials available to combat NIBMYism, to provide clearer information on opportunities for meaningful and substantive input regarding the development of affordable housing, and to meet the needs of the public, advocacy groups, elected officials, and local governments in understanding Multifamily programs offered by the Department (particularly the Housing Tax Credit program). TDHCA contracted with the University of Houston to develop a lay person's guide to Multifamily housing and local community involvement. The primer is available at: <a href="http://www/fair-housing/docs/Housing_Options_Web.pdf">http://www/fair-housing/docs/Housing_Options_Web.pdf</a> .		
Action Step ID	<b>17 Creation of External Fair Housing Outreach Listserv</b>		
Begin Date:	5/6/2014 COMPLETED - 7/9/2014	Agency Wide	<b>H</b>
Summary	A new Fair Housing listserv group was implemented to assist TDHCA in reaching external fair housing advocacy and special interest groups that may not ordinarily be part of the Department's listservs.		
Action Step ID	<b>21 TDHCA 2010 Americans with Disabilities Act (ADA) Standards Training</b>		
Begin Date:	5/30/2014 COMPLETED - 5/30/2014	Agency Wide	<b>H</b>
Summary	In January 2014 following the release of guidance from the Department of Justice, TDHCA adopted the 2010 ADA construction standards for Section 504 compliance. TDHCA's Compliance Division hosted a 2010 ADA training and invited property management, owners, engineers, architects, and the general public.		
Action Step ID	<b>24 Placement of Fair Housing Advertisement in TAAHP publication</b>		
Begin Date:	5/28/2014 COMPLETED - 6/5/2015	Agency Wide	<b>H</b>
Summary	The Department ran a fair housing ad in the 2014 and 2015 TAAHP publications. The Fair Housing Team researched statistics and created a fair housing tagline to be used to draw attention to the Department's commitment to fair housing efforts and raise public awareness about the importance of fair housing choice.		
Action Step ID	<b>28 TDHCA Presentation at TxAPA Conference on Zoning Laws and Best Practices for Fair Housing</b>		
Begin Date:	7/1/2014 COMPLETED - 10/16/2014	Agency Wide	<b>H</b>
Summary	TDHCA appeared as a speaker along with representatives from Coats Rose and the City of Buda at the Texas American Planning Association (TxAPA) Conference in Frisco, TX on October 16, 2014. The panel discussion included topics such as recent legal actions related to zoning, a city representative's perspective on the Housing Tax Credit program, how to engage with the public, and a general discussion of zoning best practices.		

TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>32 Revisions to the Compliance Monitoring and Tracking System (CMTS) to Fix and Populate Census Tract Entry</b>		
Begin Date:	7/8/2014 COMPLETED - 8/1/2015	Multifamily	<b>H</b>
Summary	The Fair Housing Team led the initiative to improve and populate the census tract entry field for each property in the Department's portfolio to prepare for the creation of a website mapping tool that will show service delivery areas and demographic populations served. This kind of tool is heavily dependent on a property's address being accurate and the ability to easily pull census data. This tool is currently in use in CMTS.		
Action Step ID	<b>43 Update of TDHCA's Section 8 Administrative Plan</b>		
Begin Date:	5/1/2014 COMPLETED - 5/26/2016	Single Family	<b>H</b>
Summary	The Department's Administrative Plan for the Section 8 Housing Choice Voucher Program (HCVP) was reviewed and revised to better align with overall Department goals to affirmatively further fair housing. The administrative plan serves as the standard operating procedures for administration of the state's HCVP in accordance with HUD requirements. Areas that were improved include procedures for assisting households with disabilities; improving access for persons with Limited English Proficiency; affirmatively furthering fair housing and handling of discrimination complaints; for instance, if a household believes illegal discrimination has prevented the family from leasing a suitable unit. The plan was formally adopted by TDHCA's board on May		
Action Step ID	<b>46 Revision to the Fair Housing Training Component of the Emergency Solutions Grants (ESG) Implementation Workshop</b>		
Begin Date:	8/5/2014 COMPLETED - 9/16/2014	Single Family	<b>H</b>
Summary	Department staff that oversee the ESG Program, with the help of the Fair Housing Team and Legal, drafted a comprehensive Fair Housing training component to be presented during the ESG Implementation Workshop each year. Training components included detailed discussions of all Civil Rights laws related to ESG, Americans with Disabilities Act (ADA) requirements for shelters, reasonable accommodation requirements, equal access guidance, Limited English Proficiency guidance, and information on affirmative outreach provisions. This is updated and provided annually.		
Action Step ID	<b>50 Creation of a Marketing Giveaway with References to Fair Housing Commitment</b>		
Begin Date:	8/21/2014 COMPLETED - 9/1/2014	Single Family	
Summary	The Texas Homeownership Program and Mortgage Credit Certification (MCC) programs created a marketing giveaway in the form of letter openers with references printed on it to the new Fair Housing commitment tagline, "Expanding Fair Housing Choice and Opportunities for all Texans" to increase the visibility of Fair Housing in the State. The letter openers were given out during the Texas Municipal League conference.		



TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>60 Qualified Allocation Plan Provisions to Ensure Incentives for Local Community Support or Opposition are Consistent with Fair Housing Objectives</b>		
Begin Date:	9/12/2012 COMPLETED - 1/1/2013	Multifamily	
Summary	Provisions were added in Section 11.9(d) of the 2013 QAP, relating to community engagement, to advise community organizations and local governments to consider Fair Housing laws, Fair Housing Activity Statement—Texas (FHAAT) forms, current Analysis of Impediment documents in local jurisdictions, one year action plans, and five year consolidated plans when generating opposition or support documents.		
Action Step ID	<b>80 NSP Training Updated to Include Elements of Fair Housing, Affirmative Marketing, and Limited English Proficiency</b>		
Begin Date:	7/30/2009 COMPLETED - 8/6/2009	Single Family	<b>H</b>
Summary	TDHCA working with the Texas Apartment Association (TAA) administered training to Neighborhood Stabilization Program (NSP) subrecipients. A full day training was offered on Affirmative Marketing and training was delivered by TAA in four locations of the state to ensure that subrecipients were aware of Fair Housing, Affirmative Marketing, and LEP requirements.		
Action Step ID	<b>101 Texas State Community Development Block Grant (CDBG) Grant Allocation to TDHCA for Use in Colonia Self-Help Centers</b>		
Begin Date:	1/1/1995 ONGOING	Single Family	<b>H</b>
Summary	The Legislature provided for use of Texas State CDBG grant allocations for the express purpose of providing housing assistance to colonia residents through the Colonia Self-Help Centers in 1995. There are seven Colonia Self-Help Centers along the Texas-Mexico border region in the following counties: El Paso, Maverick, Val Verde, Webb, Starr, Hidalgo, and Cameron/Willacy. The Colonia Self-Help Centers provide a range of assistance to Colonia residents and reduces barriers for Colonia residents seeking to apply for funds under various housing programs and other TDHCA low income and disability programs. Materials provided at the Colonia Self-Help Centers are provided in English and Spanish.		
Action Step ID	<b>107 Provision of Three Border Field Offices</b>		
Begin Date:	6/15/1993 ONGOING	Agency Wide	<b>H</b>
Summary	TDHCA supports the administration of three Border Field Offices funded by General Revenue, Appropriated Receipts, and Community Development Block Grant funds. These offices provide technical assistance to Colonia residents, nonprofits, for-profits, units of local government, and other community organizations along the Texas-Mexico border. The Border Field Offices help with applications, procurement, specification writing, and other items as needed. Like the Colonia Self-Help Centers, the Border Field Offices offer additional support and language services to residents in underserved areas within the		
Action Step ID	<b>109 Presentation of Fair Housing Team and Website Release at the Housing and Health Services Coordination Council (HHSCC) Meeting</b>		
Begin Date:	10/8/2014 COMPLETED - 10/8/2014	Agency Wide	<b>H</b>
Summary	On October 8, 2014, the Fair Housing Team Lead attended the HHSCC Meeting to share information related to the creation of the new Team and its efforts, to provide information on the release of its new fair housing website section, and to promote HHSCC		

TDHCA Fair Housing Action Steps by Impediment

members and agencies joining the TDHCA Fair Housing listserv. The website section launch was also announced via email to HHSCC members and County government email lists.

Action Step ID	<b>114 Tenant Selection Criteria Training</b>		
Begin Date:	1/5/2015 COMPLETED - 2/17/2015	Multifamily	<b>H</b>
Summary	A webinar training on the revised Tenant Selection Criteria rule in Subchapter F, Section 10.610 was created by the Fair Housing Team and presented in coordination with the Multifamily Compliance Division. The training focuses on highlights of the new rule, best practices for achieving compliance, how monitoring will be affected, and answer questions related to implementation.		
Action Step ID	<b>115 Affirmative Marketing Training</b>		
Begin Date:	1/5/2015 COMPLETED - 2/23/2015	Multifamily	<b>H</b>
Summary	A webinar training on the revised Affirmative Marketing Requirements rule in Subchapter F, Section 10.617 was created by the Fair Housing Team and presented in coordination with the Multifamily Compliance Division. The training focuses on highlights of the new rule, best practices for achieving compliance, how monitoring will be affected, and answer questions related to		
Action Step ID	<b>116 Affirmative Marketing Training (Part 2 - The Affirmative Fair Housing Marketing Database Tool)</b>		
Begin Date:	1/5/2015 COMPLETED - 2/23/2015	Multifamily	<b>H</b>
Summary	A webinar training on the Affirmative Marketing Database Tool was created by the Fair Housing Team and presented in coordination with the Multifamily Compliance Division. The training focuses on how to access the tool, basic troubleshooting guidance, and how to incorporate the tool's results in the development's Affirmative Fair Housing Marketing Plan.		
Action Step ID	<b>117 Fair Housing Overview Webinar to Celebrate Fair Housing Month 2015</b>		
Begin Date:	4/7/2015 COMPLETED - 4/7/2015	Agency Wide	<b>H</b>
Summary	Implementation of the first of a three part webinar series in coordination with the Texas Workforce Commission, Greater San Antonio Fair Housing Council, and Texas Rio Grande Legal Aid. Invitations were sent out via TDHCA's entire listserv, including the fair housing email group.		
Action Step ID	<b>118 Webinar on the Investigative Role of Texas Workforce Commission Civil Rights Division to Celebrate Fair Housing Month 2015</b>		
Begin Date:	4/14/2015 COMPLETED - 4/14/2015	Agency Wide	<b>H</b>
Summary	Implementation of the second in a three part webinar series in coordination with the Texas Workforce Commission, Greater San Antonio Fair Housing Council, and Texas RioGrande Legal Aid. Invitations were sent out via TDHCA's entire listserv, including the fair housing email group.		
Action Step ID	<b>119 Webinar on Reasonable Accommodations to Celebrate Fair Housing Month 2015</b>		
Begin Date:	4/20/2015 COMPLETED - 4/20/2015	Agency Wide	<b>H</b>
Summary	Implementation of the third of a three part webinar series in coordination with the Texas Workforce Commission, Greater San Antonio Fair Housing Council, and Texas RioGrande Legal Aid. Invitations were sent out via TDHCA's entire listserv, including the		

TDHCA Fair Housing Action Steps by Impediment

fair housing email group.

Action Step ID	<b>120 Fair Housing Overview Webinar to Celebrate Fair Housing Month 2016</b>		
Begin Date:	2/3/2016 COMPLETED - 4/12/2016	Agency Wide	<b>H</b>
Summary	Implementation of the first in a three part webinar series in coordination with the Texas Workforce Commission. The presentation provided the basics of fair housing in Texas, an overview of HUD's new Affirmatively Furthering Fair Housing rule, and a review of case scenarios. Trainings were geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners. Invitations were sent out via TDHCA's fair housing email group. Videos of the webinars were posted on TDHCA's website along with the PowerPoint slides and a transcript.		
Action Step ID	<b>121 Webinar on Reasonable Accommodations to Celebrate Fair Housing Month 2016</b>		
Begin Date:	2/3/2016 COMPLETED - 4/19/2016	Agency Wide	<b>H</b>
Summary	Implementation of the second of a three part webinar series in coordination with the Texas Workforce Commission. The presentation covered the reasonable accommodation process including details on how properties should respond when a reasonable accommodation request is made by a tenant. Trainings were geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners. Invitations were sent out via TDHCA's fair housing email group. Videos of the webinars were posted on TDHCA's website along with the PowerPoint slides and a transcript.		
Action Step ID	<b>122 Webinar on Fair Housing Best Practices for Multifamily Developments to Celebrate Fair Housing Month 2016</b>		
Begin Date:	2/3/2016 COMPLETED - 4/26/2016	Agency Wide	<b>H</b>
Summary	Implementation of the third of a three part webinar series in coordination with the Texas Workforce Commission. The presentation covered fair housing considerations for tenant selection criteria, wait list management, and affirmative marketing as well as information on Texas House Bill 1510 and the potential impact on landlord liability considerations when renting to persons with a criminal background. Trainings were geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners. Invitations were sent out via TDHCA's fair housing email group. Videos of the webinars were posted on TDHCA's website along with the PowerPoint slides and a transcript.		
Action Step ID	<b>123 Internal Fair Housing Training for TDHCA Staff (2016)</b>		
Begin Date:	2/4/2016 COMPLETED - 4/25/2016	Agency Wide	<b>H</b>
Summary	Conducted fair housing training for TDHCA staff. Training provided an overview of fair housing, disparate impact, HUD's new Affirmatively Further Fair Housing rule, outreach to outreach to persons with Limited English Proficiency including access to Language Line Services, and HUD's proposed rules on the 2013 Violence Against Women Act. Two sessions were offered to accommodate interested staff.		

## TDHCA Fair Housing Action Steps by Impediment

**Action Step ID 126 Strengthen Process to Identify and Handle Complaints with Possible Fair Housing Concerns**

Begin Date: 2/1/2016 ONGOING Agency Wide **H**

Summary Staff have identified the need to increase technical assistance surrounding possible fair housing concerns and questions in complaints received by TDHCA. Fair Housing staff are surveying current complaints and creating a streamlined process for their handling. Standard Operating Procedures will be developed for use by the Housing Resource Center, Compliance, and Fair Housing, Data Management, and Reporting Divisions at TDHCA.

**Action Step ID 130 TDHCA Fair Housing Team attendance at TDA Roundtable on Fair Housing within the Texas CDBG Program**

Begin Date: 2/25/2016 COMPLETED - 2/25/2016 Agency Wide **H**

Summary TDHCA attended the Texas Department of Agriculture roundtable discussing fair housing in rural communities utilizing Texas Community Development Block Grant program funds. Participants discussed issues specific to rural and small communities such as addressing disparities in poverty and access to opportunity.

**Action Step ID 132 Housing and Services Partnership Academy Hosted by Housing and Health Services Coordination Council (HHSCC)**

Begin Date: 8/1/2014 COMPLETED - 2/10/2016 Agency Wide **H**

Summary Department staff coordinated the Housing and Services Partnership Academy to promote Service Enriched Housing (SEH) in Texas. SEH is defined as integrated, affordable, and accessible housing that provides residents with the opportunity to receive on-site or off-site health-related and other services and supports that foster independence in living and decision-making for individuals with disabilities and persons who are elderly. The academy consisted of teams throughout the state including persons with disabilities, public housing authorities, local governments, developers, centers for independent living, and faith based organizations. The topics addressed in the academy included a tenant/consumer panel; an overview of new construction and rehabilitation development processes; identifying and securing existing units for SEH; round table sessions on housing and services programs; peer presentations; and team planning sessions.

**Action Step ID 135 Points Awarded for Fair Housing Training for HOME Single Family Subrecipients**

Begin Date: 9/4/2015 COMPLETED - 10/19/2015 Single Family **H**

Summary In the 2015 HOME competitive funding round, points were awarded to Administrators that provided evidence that Fair Housing responsibilities are included in the job description of at least one employee of the Applicant, or if at least one employee of the Applicant is documented as having attended Fair Housing training no earlier than September 4, 2014. One additional point was given if both items were met, meaning that the applicant's staff took fair housing training and will also be the point person for all fair housing related matters. The overwhelming majority of applications, 58 of 60, requested points under the Fair Housing Training criteria in the NOFA. By making this a scoring item, TDHCA effectively ensured a broader awareness of fair housing requirements and how best to assist disabled households with their housing needs.

TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>147 Provide the Housing and Health Services Coordination (HHSC) Council with Updates on the Affirmatively Furthering Fair Housing (AFFH) Rule</b>		
Begin Date:	3/15/2016 COMPLETED - 4/13/2016	Agency Wide	<b>H</b>
Summary	Fair housing staff attended the HHSC Council meeting and provided updates on HUD's new AFFH rule and Assessment of Fair Housing tool for states.		
Action Step ID	<b>148 Conduct Fair Housing Training for Multifamily Notice of Funding Availability</b>		
Begin Date:	12/11/2015 COMPLETED - 2/2/2016	Multifamily	<b>H</b>
Summary	Staff conducted a fair housing training for the multifamily notice of funding availability. The training included a fair housing update on the new affirmatively furthering fair housing rule as well as an overview of affirmative marketing and wait list		
Action Step ID	<b>151 Fair Housing Training at the Emergency Solutions Grants 2015 Implementation Workshop</b>		
Begin Date:	9/1/2015 COMPLETED - 9/22/2015	Single Family	<b>H</b>
Summary	Staff made a fair housing presentation during the 2015 Emergency Solutions Grants Implementation Workshop. Materials covered a variety of topics including civil rights laws, reasonable accommodations, affirmative outreach, limited English proficiency, and equal access and non-discrimination policies for protected classes (see also step #186).		
Action Step ID	<b>152 Conduct Coordinated Access and Fair Housing Training Webinar for Emergency Solutions Grants Program</b>		
Begin Date:	11/13/2015 COMPLETED - 1/6/2016	Single Family	<b>H</b>
Summary	ESG, Fair Housing, and Legal staff collaborated to present materials on the intersection of coordinated access and fair housing during the monthly ESG learning opportunity webinar. Training components included information on screening for diversion and homelessness prevention, applying criteria evenly across protected classes, promoting choice, and referrals to eligible		
Action Step ID	<b>152 Conduct Coordinated Access and Fair Housing Training Webinar for Emergency Solutions Grants Program</b>		
Begin Date:	11/13/2015 COMPLETED - 1/6/2016	Single Family	<b>H</b>
Summary	ESG, Fair Housing, and Legal staff collaborated to present materials on the intersection of coordinated access and fair housing during the monthly ESG learning opportunity webinar. Training components included information on screening for diversion and homelessness prevention, applying criteria evenly across protected classes, promoting choice, and referrals to eligible		
Action Step ID	<b>157 Inspection Staff Attended National Americans with Disabilities Act Symposium</b>		
Begin Date:	3/29/2016 COMPLETED - 6/22/2016	Agency Wide	<b>H</b>
Summary	Department staff who perform physical inspections of multifamily properties attended the National Americans with Disabilities Act Symposium. The conference is the most comprehensive training event available on the ADA and disability related laws. The Symposium is designed to provide the latest information on ADA regulations and guidelines, implementation strategies, and best practices. Staff generally attends annually.		

## TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>160 Presentation of Fair Housing Report and Update at the Housing and Health Services Coordination Council Meeting</b>		
Begin Date:	4/13/2016 COMPLETED - 4/13/2016	Agency Wide	<b>H</b>
Summary	On April 13, 2016, the Fair Housing Project manager attended the Housing and Health Services Coordination Council (HHSCC) meeting and shared the fair housing annual report. Staff also provided updates on the US Department of Housing and Urban Development's new Affirmatively Furthering Fair Housing rule and the Assessment of Fair Housing. Staff invited the council to participate in the Fair Housing Month webinar series, including a session on reasonable accommodations and accessibility.		
Action Step ID	<b>165 Revise the State's Citizen/Community Participation Plan to Comply with the Affirmatively Furthering Fair Housing (AFFH) Rule</b>		
Begin Date:	2/1/2016 COMPLETED - 11/9/2017	Agency Wide	<b>H</b>
Summary	Staff developed a detailed process to comply with the new requirements in HUD's AFFH Rule for the Citizen Participation Plan. The rule requires consultation and community participation in the analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals. Under the AFFH rule the participation plan must be amended prior to the initiation of the Assessment of Fair Housing process and attempt to reach a broad audience, with specific engagement required with protected classes and organizations representing those classes. The State's Citizen Participation Plan was approved at the November 9, 2017, board meeting.		
Action Step ID	<b>167 Conduct Webinar for HOME Single Family Subrecipients on Requirements to Address Persons with Limited English Proficiency</b>		
Begin Date:	5/17/2016 IN PROGRESS	Single Family	<b>H</b>
Summary	TDHCA ensures that clients of the Department have meaningful access to services, programs and activities although they may be limited in their English language proficiency. TDHCA will provide training on how to create a language access plan in 2017 to ensure subrecipients of Department HOME funds understand vital documents; how to use of a checklist for creating a Language Access Plan, and will provide a sample LAP.		
Action Step ID	<b>169 Fair Housing Ad in Texas Affiliation of Affordable Housing Providers (TAAHP) Publication</b>		
Begin Date:	4/1/2016 COMPLETED - 6/3/2016	Agency Wide	<b>H</b>
Summary	TDHCA's Division of Policy and Public Affairs ran an ad in the 2016 TAAHP annual conference program. The fair housing tagline brings attention to the Department's commitment to fair housing efforts and the importance of fair housing choice.		

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **175 Reasonable Accommodation Rule Change**

Begin Date: 5/13/2016 COMPLETED - 12/15/2016

Agency Wide

**H**

Summary Staff proposed a rule change to 10 TAC Chapter 1, Subchapter B, Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act. The revisions were proposed to clarify requirements related to accessibility standards and reasonable accommodations to ensure persons with disabilities have full and equal access to programs. The rule changes require responses to a reasonable accommodation request within a reasonable amount of time, not to exceed 14 calendar days. The response must either grant the request, deny the request, offer alternatives to the request, or request additional information to clarify the Reasonable Accommodation request. The proposed rule changes was presented at the July 28, 2016, TDHCA board meeting. Staff withdrew the proposed amendments at the August 25, 2016, TDHCA board meeting to incorporate new guidance from the Department of Justice. The proposed amendments were taken back to the board at the October 13, 2016, TDHCA board meeting. The Board approved the final rule at the December 15, 2016 board meeting. (It should be noted that since this time, further revisions to this rule have been initiated.)

Action Step ID **176 Affordable and Fair Housing Article Submitted to Texas Impact, Better Neighborhoods Newsletter**

Begin Date: 5/13/2016 COMPLETED - 6/10/2016

Agency Wide

**H**

Summary TDHCA submitted an article to Texas Impact, Better Neighbors newsletter project on affordable and fair housing in Texas. The monthly publication partners with state agencies and programs to provide information and policy implementation opportunities surrounding different issues in Texas to faith communities across the state. The article provided more information on affordable housing programs and opportunities in Texas.

Action Step ID **180 Participation in the Money Follows the Person Program to Increase Housing Options for Persons Exiting Institutions**

Begin Date: 1/1/2012 ONGOING

Single Family

**H**

Summary Since 2012, the Department has partnered with the state's Medicaid Agency, the Texas Health and Human Services Commission (HHSC) to use Money Follows the Person (MFP) funds to increase housing options for individuals who choose to exit institutions. TDHCA has used the MFP program to support the administration of Section 8 Housing Choice Vouchers targeted to individuals leaving institutions (Project Access), to develop and implement a Section 811 Project Rental Assistance (PRA) Program, and to support the administration of tenant based rental assistance through the HOME Investment Partnership Program through creating a HOME bridge program for individuals leaving institutions which can subsidize rent for up to five years for individuals awaiting Housing Choice Vouchers or other rental assistance. Staff also assists Medicaid and Service Coordinator providers on how to make referrals to housing programs and work with relocation contractors to improve programs (see also step #35 and #93). The Centers for Medicaid and Medicare Services completed a site visit to Texas to learn more about the state's MFP program. The evaluators stated that "Overall Texas has made tremendous strides at enhancing the lives of individuals

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **185 TDHCA Submitted Comments on HUD’s Assessment of Fair Housing Tools for States, Local Governments, and Public Housing Authorities**

Begin Date: 4/1/2016 COMPLETED - 5/23/2016 Single Family  
 Summary TDHCA provided comment on HUD's Affirmatively Furthering Fair Housing Assessment of Fair Housing (AFH) tool for states and insular areas, local governments, and public housing authorities. The comments addressed unique challenges Texas faces to comply with the rule, and limitations with the draft tools that would not effectively help Texas to affirmatively further fair housing. TDHCA encouraged HUD to adopt clear definitions of areas of opportunity and areas of concerted revitalization initiative, with specific percentages of HUD resources to address those two categories (see also step #199).

Action Step ID **186 Attend Training on Creating Affirmative Fair Housing Plans**

Begin Date: 8/2/2016 COMPLETED - 8/9/2016 Agency Wide **H**  
 Summary Fair housing, compliance, and single-family program area staff attended webinar training on affirmative fair housing plans. The training included information to determine the target marketing population including those ‘least likely to apply’ and document compliance with the Affirmative Fair Housing Plan.

Action Step ID **190 Solicited Feedback from the Disability Advisory Workgroup (DAW) on the Reasonable Accommodation Rule**

Begin Date: 8/2/2016 COMPLETED - 9/2/2016 Agency Wide **H**  
 Summary TDHCA staff met with the DAW on September 2, 2016, to solicit feedback on the proposed amendments to 10 TAC §1.204 Reasonable Accommodation. The DAW provides ongoing guidance on how the Department’s programs can most effectively serve persons with disabilities. Feedback was considered and incorporated into the proposed amendments to the rule taken to the October 13, 2016, board meeting.

Action Step ID **194 Creation of a Language Assistance Webpage**

Begin Date: 6/1/2016 COMPLETED - 9/29/2016 Agency Wide **H**  
 Summary The Language Assistance Webpage was created. The webpage details how persons who are not able to speak, read, write or understand the English language may request translation assistance with documents, events or other information from the Texas Department of Housing and Community Affairs. The webpage includes translations for the top 25 languages spoken by income-eligible households with limited English Proficiency in Texas. For assistance households may call the agency’s language service and utilize an interpreter to speak with TDHCA staff. A link to languages is available on critical pages for beneficiaries such as Help for Texans, Public Comment Center, Public Complaint Process, Fair Housing pages, Disaster Relief Resources, Income and Rent Limits, Section 8, Texas Homeownership, and Section 811.



## TDHCA Fair Housing Action Steps by Impediment

**Action Step ID 198 Fair Housing Staff Attended Webinar on Ensuring Fair Housing for People with Criminal Records**

Begin Date: 10/26/2016 COMPLETED - 10/26/2016 Agency Wide **H**

Summary To expand Fair housing staff's familiarity with the intersection between protected class and criminal background, staff attended a webinar with the Shriver Center and officials from HUD addressing HUD's recent guidance ensuring fair housing for people with criminal records. Criminal records can be a barrier to accessing housing for millions of Americans. HUD's guidance states that admission denials, evictions, and other adverse housing decisions based on a person's criminal record may constitute racial discrimination under the Fair Housing Act. The webinar included a sample policy from the New Orleans Housing Authority.

**Action Step ID 201 Fair Housing Considerations for Rule Writers Presentation**

Begin Date: 10/7/2016 COMPLETED - 12/7/2016 Agency Wide **H**

Summary Legal and fair housing staff created a brown bag lunch and learn presentation, fair housing considerations for rule writers (internal staff) on December 7, 2016. The presentation covered fair housing laws and guidance, disparate impact, and various rule writing examples. Information was presented on considerations when writing rules – applicable rules, protected classes under the rules, and possible disparate impacts for those protected classes. All rule writing staff for the Department were

**Action Step ID 209 Federal Home Loan Bank of Dallas Lending Line Expands Borrower Base**

Begin Date: 6/6/2016 COMPLETED - 12/29/2017 Single Family

Summary In November 2016 TDHCA switched to a new funding structure with the Federal Home Loan Bank of Dallas. The changes include a lending line that provides advances to meet the agency's short-term liquidity needs. The result is an expanded borrower base and lower mortgage rates, approximately 50 to 100 basis points lower than available under the previous structure.

**Action Step ID 211 TDHCA Attendance at the Public Policy Seminar, "The Myth of De Facto Segregation and How We Can Correct It"**

Begin Date: 5/1/2017 COMPLETED - 5/1/2017 Agency Wide **H**

Summary Staff attended a presentation by author Richard Rothstein regarding his research on residential segregation in Austin and across the United States. Mr. Rothstein spoke on explicit government policies that created and maintained de jure residential segregation including policies from the New Deal agencies like the Public Works Administration, the Federal Housing Administration, local housing authorities, and the Internal Revenue Service. The research aims to create a broader awareness of the government policies that created segregation as a first step to undertake specific action steps to remedy those wrongs.

**Action Step ID 213 Creation of Opportunity Maps for the Public Housing Authority Jurisdiction, Provided to Voucher Holders**

Begin Date: 3/10/2017 COMPLETED - 9/25/2017 Single Family **H**

Summary Staff created a series of maps of housing opportunities within the Department's Public Housing Authority (PHA) jurisdiction. The maps show TDHCA properties, veteran clinics, and local schools, by median rent, median income, and poverty rate. The maps are available by county for each of the 34 counties in the PHA service area. In September 2017, the Department began to provide the maps and related information when briefing voucher holders.

## TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>214 Fair Housing Presentation to Assertive Community Treatment Team with Austin/Travis County Integral Care</b>		
Begin Date:	6/28/2017 COMPLETED - 7/18/2017	Single Family	<b>H</b>
Summary	<p>The Fair Housing Project Manager conducted a 60-minute in-person training for Austin/Travis County Integral Care staff who use various TDHCA programs including Project Access and Section 811. Assertive Community Treatment, used by those trained, is an Evidence-Based Practice Model designed to provide treatment, rehabilitation and support services to individuals who are diagnosed with a severe mental illness and whose needs have not been well met by more traditional mental health services. The ACT team provides services directly to an individual that are tailored to meet his or her specific needs. ACT teams are multi-disciplinary and include members from the fields of psychiatry, nursing, psychology, social work, substance abuse and vocational rehabilitation. Based on their respective areas of expertise, the team members collaborate to deliver integrated services of the recipients' choice, assist in making progress towards goals, and adjust services over time to meet recipients' changing needs and goals. Presentation materials focused on reasonable accommodations for persons with disabilities and information on HUD's guidance related to criminal background checks.</p>		
Action Step ID	<b>217 Creation of a Fair Housing Digital Infographic</b>		
Begin Date:	1/5/2017 COMPLETED - 4/6/2017	Agency Wide	<b>H</b>
Summary	<p>The Department's Division of Policy and Public Affairs created a fair housing digital info graphic. The infographic provides information on how to request a reasonable accommodation, as well as the seven protected classes. The info graphic was published on the website RentCafe (<a href="https://www.rentcafe.com/blog/renting/april-is-national-fair-housing-month-learn-what-it-means-to-you/">https://www.rentcafe.com/blog/renting/april-is-national-fair-housing-month-learn-what-it-means-to-you/</a>). The graphic was made available, for free, on the Department's website for use by consumers, advocacy organizations, and housing professionals.</p>		
Action Step ID	<b>218 Conduct Fair Housing Training for New Board Members</b>		
Begin Date:	5/1/2017 COMPLETED - 5/24/2017	Agency Wide	<b>H</b>
Summary	<p>Fair Housing Project Manager met with the Department's new board members and conducted a fair housing training on key fair housing laws and the way they intersect with the Department's programs.</p>		
Action Step ID	<b>221 Submittal of Proposal for Presentation on Fair Housing to County Judges and Commissioners Association of Texas (CJCAT)</b>		
Begin Date:	4/1/2017 COMPLETED - 7/3/2017	Agency Wide	<b>H</b>
Summary	<p>Fair Housing staff submitted a conference proposal to the County Judges and Commissioners Association of Texas entitled Fair Housing Considerations for Counties. The proposal included an overview of financing options and local decision-making considerations that affect those financing options (letters of support, local financing, NIMBYism) under the Fair Housing Act. The proposal was not accepted.</p>		

## TDHCA Fair Housing Action Steps by Impediment

### Action Step ID **228 Housing Assistance Letters Translated into Spanish**

Begin Date: 6/1/2015 COMPLETED - 9/8/2017

Agency Wide

**H**

Summary The Department's Housing Resource Center had housing assistance template response letters translated into the Spanish language. These letters provide information on a variety of assistance areas such as long term and short term rental needs, home repair, homebuyer assistance, utility assistance, weatherization, disaster, complaints, foreclosure and fair housing. The templates are used by agency staff answering phone calls, emails, fax and USPS mail.

### Action Step ID **232 Creation of a Single Family Programs Affirmative Marketing Tool**

Begin Date: 7/1/2016 COMPLETED - 9/13/2017

Single Family

**H**

Summary Staff built a tool to comply with 10 TAC §20.9 Fair Housing, Affirmative Marketing and Reasonable Accommodations. The tool identifies the least likely to apply populations by program activity type (homebuyer, rehabilitation, or rental assistance) and region. It works by comparing Census Demographic Data from the American Community Survey (2011-2015) to all single-family households served during calendar years 2006-2015. For a group to be underrepresented, the percentage of the households belonging in the group served in the Housing Contract System is at least 20% less than the percentage of the same group representation in the region. Administrators may use the Department's tool to identify the least likely to apply populations, or another method. If another method is used administrators must provide a detailed explanation of the methodology used. Staff

### Action Step ID **235 Request to Adopt Small Area Fair Market Rents in the Housing Choice Voucher Program (HCVP)**

Begin Date: 11/1/2017 COMPLETED - 1/1/2018

Single Family

**H**

Summary The Department requested permission from the regional HUD office to use an alternative standard, to adopt Small Area Fair Market Rents (SAFMRs) for counties in the jurisdiction that fall within the Fort Worth or San Antonio Metro Fair Market Areas. SAFMRs provide clients with access to a broader range of neighborhoods, thus allowing them the choice to move into areas with more employment, transportation and educational opportunities. Additionally, use of the SAFMRs may allow the Department to prevent undue subsidy in lower-rent neighborhoods. The request was sent for Johnson, Bandera, Comal, Guadalupe, and Wilson counties. The waiver request was sent on November 29, 2017. On December 23, 2017, the United States District Court for the District of Columbia ordered HUD to implement the mandatory components of the Small Area FMR rule on January 1, 2018, HUD agreed to begin implementing in April 2018.

## TDHCA Fair Housing Action Steps by Impediment

**Action Step ID 236 Department Participation in the Joint Solutions Housing Work Group**

Begin Date: 8/17/2017 ONGOING Agency Wide **H**

Summary The Department participates in the Joint Solutions Housing Work Group (JSHWG) consisting of local, state, and federal organizations (including the Federal Emergency Management Agency and HUD) that help perform the critical role of assessing housing needs and long term recovery needs in the wake of a disaster. The JSHWG utilizes all appropriate housing resources available from state and federal agencies, the local government, non-profit community and private sector; communicates and coordinates feasible housing solutions, as families transition to more permanent housing; and maintains a holistic community approach in addressing disaster survivors unmet housing needs. While persons affected by a disaster are not necessarily specific members of a protected class the needs of persons impacted by the disaster may differ based on membership in a protected class, such as persons with disabilities. The Department currently chairs the work group.

**Action Step ID 241 TDHCA Single Family Affirmative Marketing Plan Form**

Begin Date: 3/2/2018 COMPLETED - 3/2/2018 Single Family **H**

Summary The Department created an easy-to-use form for administrators to use when building and submitting their single family affirmative marketing plans to the Department. The form is an available option for Administrators. Per 10 Texas Administrative Code § 20.9(b)(1) Administrators must use HUD Form 935.2B, the form on the Department's website, or create an equivalent Affirmative Fair Housing Marketing Plan. The form includes links to the applicable section of the Title 10 of the Texas

**Action Step ID 242 Provided a Webinar with a Fair Housing Overview to Celebrate Fair Housing Month 2018**

Begin Date: 11/1/2017 COMPLETED - 4/10/2018 Agency Wide **H**

Summary The Department, in conjunction with the Texas Workforce Commission's Civil Rights Division, hosted a webinar during April 2018's 50th Anniversary of the Fair Housing Act on April 10, 2018. Topics covered included protected classes, discriminatory practices, exemptions, and fair housing testing. Participants had a chance to apply their knowledge in a review of case scenarios. This webinar had more than 400 participants.

**Action Step ID 243 Texas Statewide Homebuyer Education Program (TSHEP)**

Begin Date: 9/1/1997 ONGOING Single Family

Summary In 1997, the 75th Texas Legislature passed HB 2577, which charged TDHCA with the development and implementation of a statewide homebuyer education program, designed to provide information and counseling to prospective homebuyers about the home buying process. The Texas Statewide Homebuyer Education Program (TSHEP) was created to fulfill this mandate. To ensure uniform quality of the homebuyer education provided throughout the state, TDHCA partnered with NeighborWorks America, a nationally recognized organization, to administer TSHEP as a train-the-trainer program and to teach local nonprofit organizations the principles and applications of comprehensive pre- and post purchase homebuyer education, and to certify participants as providers of homebuyer training. To date approximately 731 individuals have been certified as homebuyer

TDHCA Fair Housing Action Steps by Impediment

education providers by the Texas Statewide Homebuyer Education Program.

Action Step ID	<b>247 Housing Choice Voucher Section 8 Program Staff Develop Relationships &amp; Referral Network</b>		
Begin Date:	11/1/2016 ONGOING	Single Family	<b>H</b>
Summary	Section 8 Program Staff have developed relationships with staff at state hospitals and other key referral organizations for the Project Access Program. Examples include Austin Resource Center for Independent Living (ARCIL) and the Center on Independent Living (COIL) in San Antonio. Staff are currently discussing program eligibility, required forms for submittal, and helpful tips on dealing with other Public Housing Authorities and waiting lists to ensure Project Access clients have as much guidance as possible in exiting institutions.		
Action Step ID	<b>249 Emergency Solutions Grants (ESG) Colonia Point Criterion</b>		
Begin Date:	1/9/2017 COMPLETED - 11/13/2017	Single Family	<b>H</b>
Summary	The 2017/2018 ESG Notice of Funding Availability included a scoring criterion which awarded points under a competitive application to entities that specifically included one or more colonias within the service area of the applicant. Applicants are required to market their services to the entire service area. Inclusion of colonias in the marketing area informs colonia residents of the services available to them under the ESG Program.		
Action Step ID	<b>257 Undesirable Site Features for the 2018 Uniform Multifamily Rules</b>		
Begin Date:	6/1/2017 COMPLETED - 1/3/2018	Multifamily	<b>H</b>
Summary	Development sites within the applicable distance of any of the undesirable features are considered ineligible unless the Department's Board determines that information regarding mitigation is sufficient per 10 Texas Administrative Code § 10.101(a)(2). Undesirable site features include proximity to junkyard, solid waste facility, sanitary landfill, illegal dumping sites, sexually-oriented business, high voltage transmission line, active railroad tracks, heavy industry, nuclear plant, accident zones or clear zones of any airport, pipelines carrying highly volatile liquids, oil refinery, and environmental factor that may adversely		
Action Step ID	<b>258 Undesirable Neighborhood Characteristics for the 2018 Uniform Multifamily Rules</b>		
Begin Date:	6/1/2017 COMPLETED - 1/3/2018	Multifamily	
Summary	Applicants must disclose the presence of undesirable neighborhood characteristics, per 10 Texas Administrative Code § 10.101(a)(3). Undesirable neighborhood characteristics include high poverty rates (above 40 percent for individuals or 55 percent for Developments in regions 11 and 13), violent crime rate greater than 18 per 1,000 persons, proximity to vacant or blighted structures, and schools that do not have a Met Standard rating. In order to be considered as an eligible site despite the presence of such undesirable neighborhood characteristic, an applicant must demonstrate actions being taken that would lead a reader to conclude that there is a high probability and reasonable expectation the undesirable characteristic will be sufficiently mitigated or significantly improved within a reasonable time, typically prior to placement in service, and that the undesirable characteristic demonstrates a positive trend and continued improvement.		

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **259 Conducted Internal Training on Fair Housing Considerations for Written Policies & Procedures and Complaints**

Begin Date: 5/11/2018 COMPLETED - 7/23/2018

Multifamily

**H**

Summary The Fair Housing Manager and Federal Compliance Counsel held an internal training for compliance staff. The two hour training provided an overview of applicable civil rights laws, the Fair Housing Act, and reasonable accommodation requests. Staff reviewed examples of written policies and procedures regarding reasonable accommodations and familial status issues and discussed potential areas of concern.

Action Step ID **260 TDHCA Attendance at the 2018 Fair Housing Summit**

Begin Date: 4/2/2018 COMPLETED - 4/5/2018

Agency Wide

**H**

Summary Department staff from the Compliance, Section 811 Project Rental Assistance Program, and Fair Housing divisions attended the 2018 Fair Housing Summit hosted by the City of Austin and Texas Workforce Commission. The summit included keynote presentations and educational workshops with fair housing experts. Sessions included information on fair housing case investigations, disability law, legal updates, affordable housing, and hate crimes. The summit examined barriers to fair housing that still remain and shared best practices to affirmatively further fair housing.

Action Step ID **261 Internal Fair Housing Training for Housing Choice Voucher Section 8 Program Staff**

Begin Date: 2/28/2018 COMPLETED - 5/9/2018

Single Family

**H**

Summary Fair housing staff, in collaboration with the legal division, conducted a two-hour training for the Housing Choice Voucher Section 8 Program staff. The training covered protected classes, reasonable accommodations, accessibility rules in multifamily properties, HUD guidance on the use of criminal records in housing transactions, and reviewed the Section 8 program administrative plan. Program area staff discussed specific concerns related to occupancy standards, housing choice, and

**Impediment 3 The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.**

Action Step ID	<b>4 Redevelopment of TDHCA Fair Housing Website</b>		
Begin Date:	6/11/2014 COMPLETED - 10/9/2014	Agency Wide	<b>H</b>
Summary	This activity involved improving awareness and availability of information through the redevelopment of the TDHCA Fair Housing website to improve fair housing complaint direction, increase fair housing training and knowledge across the state, and provide toolkits and information resources specific to renters, homebuyers, development owners and administrators, real estate professionals, local governments, and elected officials. New website sections were created such as a survey, news corner, and a listing of Texas Fair Housing events. Renter and homebuyer information includes fair housing and reasonable accommodations rights information, unbanked resident toolkits for building credit, information on how to find affordable rental housing, and landlord-tenant toolkits and brochures. Development owners, administrators, and real estate professionals will find best policy guidance, rules information, and sample forms and documents. Local governments and elected officials will find information on zoning best practices as suggested in the Phase 2 Analysis of Impediments (AI). While this activity was reported as completed, the website continues to be updated and augmented.		
Action Step ID	<b>9 Review and Revision of TDHCA's Language Assistance Plan</b>		
Begin Date:	4/22/2014 COMPLETED - 8/1/2014	Agency Wide	<b>H</b>
Summary	The Language Assistance Plan was completed and will be periodically revisited. In February 2015, TDHCA secured two contracts for third party interpretation and translation services - one for Spanish language services, and one for all other languages. The agency will roll out translated documents and resources as deemed necessary in the Language Access Plan.		
Action Step ID	<b>10 Housing and Health Services Coordination Council (HHSCC) and TDHCA Creation of Rental Assistance Video Series</b>		
Begin Date:	COMPLETED - 9/26/2014	Agency Wide	<b>H</b>
Summary	To improve the availability of information, the HHSCC and TDHCA collaborated on a short video series to educate the public on fair housing (including reasonable accommodations), homebuyer assistance, rental assistance, energy assistance, home repair, emergency assistance, and service enriched housing. The short video series is available on TDHCA's website and is used to engage and inform the public. From March 2015 to March 2017 there were nearly 1,000 page views on TDHCA's webpage with the video series.		
Action Step ID	<b>17 Creation of External Fair Housing Outreach Listserv</b>		
Begin Date:	5/6/2014 COMPLETED - 7/9/2014	Agency Wide	<b>H</b>
Summary	A new Fair Housing listserv group was implemented to assist TDHCA in reaching external fair housing advocacy and special interest groups that may not ordinarily be part of the Department's listservs.		

## TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>19 Fair Housing Focused External Email and Marketing Statement</b>		
Begin Date:	5/28/2014 COMPLETED - 7/14/2014	Agency Wide	<b>H</b>
Summary	The Fair Housing Team and staff from the Policy and Public Affairs Division met with Executive and developed a new mission statement and byline that highlight fair housing. The mission statement is used with external marketing publications and communications, and is often used in Department staff email signature lines.		
Action Step ID	<b>39 Provision of Fair Housing and Educational Materials for Section 8 Recipients</b>		
Begin Date:	7/1/2016 ONGOING	Single Family	<b>H</b>
Summary	TDHCA serves as a small Public Housing Authority (PHA). As committed in its PHA Administrative Plan the Section 8 Division provides Fair Housing guidance to both prospective tenants and property Owners/landlords in the form of Fair Housing information packets and briefings to tenant and new landlords. In addition to fair housing information, the briefing packet was recently updated to include information and maps on proximity to hospitals, schools, and other amenities by location/area. The packet is periodically reviewed and updated (see also step #212).		
Action Step ID	<b>40 Section 8 Reasonable Accommodations Policies and Requirements</b>		
Begin Date:	6/15/2012 ONGOING	Single Family	<b>H</b>
Summary	TDHCA's Section 8 Program tracks requests and responses relating to reasonable accommodation requests made in relation to this program and requires reasonable accommodations statements be included in the intake application and in client briefing packets. Local Operators (in use for most of the AI period, but no longer utilized) and TDHCA inspect properties for equal opportunity posters, complaint information, and reasonable accommodation policy provision during annual onsite Section 8 Management Assessment Program (SEMAP) inspections. Sample Forms for reasonable accommodation requests are also handed out in briefing packets and discussed during Section 8 briefings. TDHCA staff also provides information on reasonable accommodation requests in renewal packets.		
Action Step ID	<b>43 Update of TDHCA's Section 8 Administrative Plan</b>		
Begin Date:	5/1/2014 COMPLETED - 5/26/2016	Single Family	<b>H</b>
Summary	The Department's Administrative Plan for the Section 8 Housing Choice Voucher Program (HCVP) was reviewed and revised to better align with overall Department goals to affirmatively further fair housing. The administrative plan serves as the standard operating procedures for administration of the state's HCVP in accordance with HUD requirements. Areas that were improved include procedures for assisting households with disabilities; improving access for persons with Limited English Proficiency; affirmatively furthering fair housing and handling of discrimination complaints; for instance, if a household believes illegal discrimination has prevented the family from leasing a suitable unit. The plan was formally adopted by TDHCA's board on May		



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Action Step ID	<b>45 Fair Housing Training Requirement Changes</b>		
Begin Date:	4/22/2014 COMPLETED - 12/1/2014	Agency Wide	<b>H</b>
Summary	The Fair Housing Training Request for Qualifications (RFQ) was reviewed. Small changes were discussed with Asset Management and recommended during the rule-making process in Subchapter E (fair housing training certifications must demonstrate training within the last year and expectations for separate trainings for engineers and architects and Owners and managers were clarified). TDHCA requires five hours of TDHCA approved fair housing training for Development Owners, management companies, and Development architects or engineers responsible for fair housing compliance. Training Certifications must be submitted as part of post bond closing documentation (for Multifamily Bond transactions) and documentation submitted for the 10 Percent Test (for Housing Tax Credits). Additional changes to the Fair Housing Training RFQ and the potential for a free online training course promulgated by TWC or TDHCA will be reviewed.		
Action Step ID	<b>47 Creation of a Brochure Regarding Tenant's Programmatic Rights</b>		
Begin Date:	8/8/2014 COMPLETED - 1/1/2015	Multifamily	<b>H</b>
Summary	A tenant rights and resources brochure was created by the Fair Housing and Compliance team with the intent of: 1) increasing education about fair housing rights and reasonable accommodations, 2) increasing education about the rights of Section 8 renters in TDHCA funded multifamily rental properties, 3) creating a more meaningful fair housing disclosure notice, and 4) ensuring properties are adequately advertising their available amenities and services. Brochures are posted in multifamily properties and given to tenants at move in. The Uniform Multifamily Rules require that a Fair Housing Disclosure Notice form be presented to the household at the time of application for occupancy. The form provides the household with notification of their rights to choose among available housing options. The brochure is available in English and Spanish. In July 2016 the brochure was translated upon request into Chinese and Filipino (see also step #222).		
Action Step ID	<b>49 Revamp of the Research Database Used When Answering the Auto-Call Distribution (ACD) Phone Line</b>		
Begin Date:	8/21/2014 COMPLETED - 4/1/2015	Agency Wide	<b>H</b>
Summary	The research database, which provides the content for the Help for Texans center of the TDHCA webpage, was revamped at the Housing Resource Center's request to include fair housing related content which can now be included in reporting and tracking of calls through the ACD line. HRC also follows up on fair housing related ACD calls with an informational letter directing callers to the Texas Workforce Commission for fair housing complaints and to the Fair Housing Team and new website section for fair housing-related information.		
Action Step ID	<b>50 Creation of a Marketing Giveaway with References to Fair Housing Commitment</b>		
Begin Date:	8/21/2014 COMPLETED - 9/1/2014	Single Family	
Summary	The Texas Homeownership Program and Mortgage Credit Certification (MCC) programs created a marketing giveaway in the form of letter openers with references printed on it to the new Fair Housing commitment tagline, "Expanding Fair Housing Choice and		

TDHCA Fair Housing Action Steps by Impediment

Opportunities for all Texans" to increase the visibility of Fair Housing in the State. The letter openers were given out during the Texas Municipal League conference.

Action Step ID	<b>62</b>	<b>Uniform Multifamily Rule Provision Related to Owner Certification of Fair Housing Education</b>		
Begin Date:	1/17/2013	COMPLETED - 1/17/2013	Multifamily	<b>H</b>
Summary	The Uniform Multifamily rule provision in Subchapter C, Section 10.204(1)(D) requires the Development Owner to certify to the reading and understanding of the Department's fair housing educational materials posted on the website as of the beginning of the application acceptance period. The inclusion of this provision is intended to assist in reminding Owners of their duties and obligations under Fair Housing law and in aligning with TDHCA's certification to affirmatively further fair housing.			
Action Step ID	<b>63</b>	<b>Uniform Multifamily Rule Provisions Requiring Fair Housing Training Certification for Owners, Management Agents, Engineers, and Architects</b>		
Begin Date:	1/17/2013	COMPLETED - 1/17/2013	Multifamily	<b>H</b>
Summary	The Uniform Multifamily rule provisions in 10.402(e) and (g) of Subchapter E require 4% Housing Tax Credit (HTC) and Mortgage Revenue Bonds (MRB) and 9% Competitive HTC awarded developments to demonstrate five hours of Fair Housing Training for Owners and Management Agents and either the lead Engineers or Architects at the time of Post Bond Closing and/or the HTC 10% Test as applicable to the program. Demonstration of training must be provided in the form of a training certification provided within the last 2 years. HOME multifamily Developments are required to share training methods at the time of application when they submit a development's Affirmative Marketing Plan.			
Action Step ID	<b>65</b>	<b>Uniform Multifamily Rule Provision Related to a Fair Housing Disclosure Notice</b>		
Begin Date:		COMPLETED - 1/8/2015	Multifamily	<b>H</b>
Summary	The Uniform Multifamily Rules, under Subchapter F, Section 10.612(a)(4) require that a Fair Housing Disclosure Notice form be presented to the household at the time of application for occupancy and must be executed prior to the lease. The form provides the household with notification of their rights to choose among available housing options. The notice was incorporated into 10 TAC §10.613(k), the Tenant Rights and Resource Guide as of January 2, 2015.			
Action Step ID	<b>117</b>	<b>Fair Housing Overview Webinar to Celebrate Fair Housing Month 2015</b>		
Begin Date:	4/7/2015	COMPLETED - 4/7/2015	Agency Wide	<b>H</b>
Summary	Implementation of the first of a three part webinar series in coordination with the Texas Workforce Commission, Greater San Antonio Fair Housing Council, and Texas Rio Grande Legal Aid. Invitations were sent out via TDHCA's entire listserv, including the fair housing email group.			
Action Step ID	<b>118</b>	<b>Webinar on the Investigative Role of Texas Workforce Commission Civil Rights Division to Celebrate Fair Housing Month 2015</b>		
Begin Date:	4/14/2015	COMPLETED - 4/14/2015	Agency Wide	<b>H</b>
Summary	Implementation of the second in a three part webinar series in coordination with the Texas Workforce Commission, Greater San			

## TDHCA Fair Housing Action Steps by Impediment

Antonio Fair Housing Council, and Texas RioGrande Legal Aid. Invitations were sent out via TDHCA's entire listserv, including the fair housing email group.

Action Step ID	<b>119 Webinar on Reasonable Accommodations to Celebrate Fair Housing Month 2015</b>		
Begin Date:	4/20/2015 COMPLETED - 4/20/2015	Agency Wide	<b>H</b>
Summary	Implementation of the third of a three part webinar series in coordination with the Texas Workforce Commission, Greater San Antonio Fair Housing Council, and Texas RioGrande Legal Aid. Invitations were sent out via TDHCA's entire listserv, including the fair housing email group.		
Action Step ID	<b>120 Fair Housing Overview Webinar to Celebrate Fair Housing Month 2016</b>		
Begin Date:	2/3/2016 COMPLETED - 4/12/2016	Agency Wide	<b>H</b>
Summary	Implementation of the first in a three part webinar series in coordination with the Texas Workforce Commission. The presentation provided the basics of fair housing in Texas, an overview of HUD's new Affirmatively Furthering Fair Housing rule, and a review of case scenarios. Trainings were geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners. Invitations were sent out via TDHCA's fair housing email group. Videos of the webinars were posted on TDHCA's website along with the PowerPoint slides and a transcript.		
Action Step ID	<b>121 Webinar on Reasonable Accommodations to Celebrate Fair Housing Month 2016</b>		
Begin Date:	2/3/2016 COMPLETED - 4/19/2016	Agency Wide	<b>H</b>
Summary	Implementation of the second of a three part webinar series in coordination with the Texas Workforce Commission. The presentation covered the reasonable accommodation process including details on how properties should respond when a reasonable accommodation request is made by a tenant. Trainings were geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners. Invitations were sent out via TDHCA's fair housing email group. Videos of the webinars were posted on TDHCA's website along with the PowerPoint slides and a transcript.		
Action Step ID	<b>122 Webinar on Fair Housing Best Practices for Multifamily Developments to Celebrate Fair Housing Month 2016</b>		
Begin Date:	2/3/2016 COMPLETED - 4/26/2016	Agency Wide	<b>H</b>
Summary	Implementation of the third of a three part webinar series in coordination with the Texas Workforce Commission. The presentation covered fair housing considerations for tenant selection criteria, wait list management, and affirmative marketing as well as information on Texas House Bill 1510 and the potential impact on landlord liability considerations when renting to persons with a criminal background. Trainings were geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners. Invitations were sent out via TDHCA's fair housing email group. Videos of the webinars were posted on TDHCA's website along with the PowerPoint slides and a transcript.		
Action Step ID	<b>126 Strengthen Process to Identify and Handle Complaints with Possible Fair Housing Concerns</b>		
Begin Date:	2/1/2016 ONGOING	Agency Wide	<b>H</b>

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Summary	Staff have identified the need to increase technical assistance surrounding possible fair housing concerns and questions in complaints received by TDHCA. Fair Housing staff are surveying current complaints and creating a streamlined process for their handling. Standard Operating Procedures will be developed for use by the Housing Resource Center, Compliance, and Fair Housing, Data Management, and Reporting Divisions at TDHCA.		
Action Step ID	<b>127 Research Notification Process between TDHCA, Internal Revenue Service, and the US Department of Housing and Urban Development or Texas Workforce Commission, Ensure Compliance with Memorandum of Understanding</b>		
Begin Date:	10/1/2015 COMPLETED - 7/1/2016	Agency Wide	<b>H</b>
Summary	Ensure communication of 'cause' findings between Texas Workforce Commission, and TDHCA, per the memorandum of understanding between the US Department of Housing and Urban Development, the Department of Justice, and the Internal Revenue Service.		
Action Step ID	<b>159 Fair Housing Information Added to Handouts of TDHCA Programs and Resources</b>		
Begin Date:	2/18/2016 COMPLETED - 4/1/2016	Agency Wide	<b>H</b>
Summary	TDHCA's Policy & Public Affairs division revised agency handouts to include references to fair housing resources along with TDHCA program resources. These are available on-demand for staff attending local events. The handouts, which include contact information for a variety of local resources, can be generated in English and Spanish versions from the "Resources" database.		
Action Step ID	<b>170 Revise TDHCA's Description in the Texas State Directory to include Fair Housing</b>		
Begin Date:	5/27/2016 COMPLETED - 6/15/2016	Agency Wide	<b>H</b>
Summary	TDHCA's description in the Texas State Directory was revised to include the agency's fair housing work, to expand fair housing choice and opportunities for Texans. The directory is an almanac of Texas government including information on cities, counties, and state government.		
Action Step ID	<b>178 Attended Webinar on Advocacy Strategies for Protecting the Fair Housing Rights of People with Criminal Records</b>		
Begin Date:	5/20/2016 COMPLETED - 6/7/2016	Agency Wide	<b>H</b>
Summary	Fair Housing staff attended the Shriver Center and the National Housing Law Project joint webinar addressing the intersection of fair housing issues and persons with criminal records. Adverse housing decisions based on a person's criminal record screening may violate the Fair Housing Act, which prohibits discrimination on the basis of race. The presentation provided a summary of HUD policies relating to the use of criminal records, an overview of HUD guidance, and common issues related to tenant screening, eviction policies, due process rights, blanket bans, reasonable look back periods, discretion and denials.		
Action Step ID	<b>206 Fair Housing Webinar Series 2017: Webinar One – Fair Housing Overview</b>		
Begin Date:	12/15/2016 COMPLETED - 4/4/2017	Agency Wide	<b>H</b>
Summary	Implementation of a two part webinar series in coordination with the Texas Workforce Commission Civil Rights Division. The presentation covered the basics of fair housing in Texas and a review of case scenarios, including an overview of fair housing		

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testing. Over 500 attendees participated in the webinar. Trainings are geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners.

Action Step ID	<b>216</b>	<b>Actions to Comply with the Violence Against Women Act</b>		
Begin Date:	12/23/2016	COMPLETED - 9/7/2017	Multifamily	<b>H</b>
Summary	<p>In March 2017, HUD released their implementing regulations regarding the Violence Against Women Act (VAWA). VAWA was reauthorized in 2013 and provided basic protections for applicants and residents at many affordable housing properties, including all HOME and Housing Tax Credit Developments who have experienced domestic violence, dating violence, or sexual assault. The regulations require a Notice of Occupancy Rights and the Certification be provided when a household applies for assistance, if a household is denied occupancy and/or if an existing household is notified that they are being evicted or their lease will not be renewed. In addition, there is a model emergency transfer plan. HUD’s regulations require owners of developments with HOME, National Housing Trust Fund, Neighborhood Stabilization Program, and any state (Multifamily Direct Loan) funds used as HOME match, that receive a contract on or after December 16, 2016, to permit a tenant to break a lease without penalty if the Department determines that the tenant meets the criteria for an emergency transfer under 24 CFR §5.2005. Staff proposed amendments to 10 TAC to comply with the regulations and took those to the Department’s board on April 27, 2017. The rule was finalized by the board at the September 7, 2017, board meeting.</p>			
Action Step ID	<b>222</b>	<b>Conference Presentation Proposal, Texas Association of Local Housing Finance Agencies (TALHFA)</b>		
Begin Date:	4/14/2017	COMPLETED - 10/27/2017	Agency Wide	<b>H</b>
Summary	<p>Fair Housing staff submitted a conference proposal to present at the annual TALHFA meeting in October 2017. The proposal, Fair Housing Considerations for Housing Finance Agencies, would provide an overview of fair housing principles and permitting in a non-discriminatory manner as it relates to the Fair Housing Act. The presentation would review accessibility requirements such as unit design, 2010 ADA standards, and the distribution of accessible units. The presentation proposal was ultimately not</p>			
Action Step ID	<b>226</b>	<b>TDHCA Attendance at the Opportunity Forum presented by the University of Texas School of Law: After the Storm, Building Resilient and Equitable Communities</b>		
Begin Date:	10/1/2017	COMPLETED - 10/6/2017	Agency Wide	<b>H</b>
Summary	<p>The forum explored rebuilding efforts in the wake of Hurricane Harvey and the challenges specific to historically underserved populations, including low-income persons of color. Panelists discussed strategies to protect all residents from future flooding and exposure to hazards, lessons learned from prior disasters, and how to rebuild resilient and equitable communities. Staff attended in an effort to understand the rebuilding challenges faced by protected populations.</p>			
Action Step ID	<b>261</b>	<b>Internal Fair Housing Training for Housing Choice Voucher Section 8 Program Staff</b>		
Begin Date:	2/28/2018	COMPLETED - 5/9/2018	Single Family	<b>H</b>
Summary	<p>Fair housing staff, in collaboration with the legal division, conducted a two-hour training for the Housing Choice Voucher Section</p>			

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8 Program staff. The training covered protected classes, reasonable accommodations, accessibility rules in multifamily properties, HUD guidance on the use of criminal records in housing transactions, and reviewed the Section 8 program administrative plan. Program area staff discussed specific concerns related to occupancy standards, housing choice, and

Action Step ID

**262 Homeownership Month for June 2018, Distribution of Fair Housing Materials**

Begin Date:

4/27/2018 COMPLETED - 7/1/2018

Single Family

Summary

The Department celebrated homeownership month for June 2018 with the creation and inclusion of fair housing materials. Staff used flyers, infographics, and other print materials to provide fair housing information on protected classes, reasonable accommodations, and discrimination in the sale, rental and financing of dwellings.

**Impediment 4 Protected classes may experience disparities in home mortgage loan denials and high cost loans.**

- Action Step ID 73 Combination of Mortgage Credit Certificate (MCC) and Down Payment Assistance Through the Homebuyer Program**  
 Begin Date: 10/1/2012 ONGOING Single Family  
 Summary Program rules for the Texas Homeownership program allow homebuyers to receive both down payment assistance and access to the MCC program to claim tax credits for a portion of their mortgage paid each year, thereby extending greater levels of assistance to low income homebuyers across the state of Texas which are more likely to be members of protected classes. In addition, this action step helps address impediments related to improving consumer knowledge of mortgage loan options.
- Action Step ID 74 Homebuyer Contract with eHousing Plus**  
 Begin Date: 6/1/2012 ONGOING Single Family  
 Summary In 2012, the Texas Homeownership Program contracted with a third party contractor, eHousing Plus, to streamline demographic and data collection. Data is now provided via a web-based system that can be extracted into excel for analysis and use in determining trends and patterns. This new system allows program staff to request data metrics and back up on an as needed basis to create new policies and examine barriers.
- Action Step ID 75 Prohibited Discrimination Provisions in Master Mortgage Origination Agreements**  
 Begin Date: 6/1/2004 ONGOING Single Family  
 Summary For the Texas Homeownership Program the Master Mortgage Origination Agreements promulgated by the Department (Section 4.15) include prohibitions of discrimination and give TDHCA the right to request periodic reports on applicant data at any time to ensure that the master mortgage originator is not engaging in discriminatory practices. This language has been in place in agreements since at least 2004.
- Action Step ID 76 Prohibited Discrimination Provisions in Participating Lender Agreements**  
 Begin Date: 1/1/2004 ONGOING Single Family  
 Summary For the Texas Homeownership Program Participating Lender Agreements promulgated by TDHCA include nondiscrimination provisions based on protected class status. Such nondiscrimination provisions also protect the exercising of rights under the Federal Consumer Credit Protection Act and other antidiscrimination laws or laws based on any other characteristic of a person defined as a prohibited basis for credit discrimination under state, federal, or local laws. Nondiscrimination provisions have been in place since at least 2004.
- Action Step ID 77 Homebuyer Program Website Provision of Credit Rating information**  
 Begin Date: 6/1/2005 ONGOING Single Family  
 Summary TDHCA's Homebuyer programs maintain a separate website interface that includes consumer information such as information on where to request a free credit report and referrals to agencies in a searchable area through the Help for Texans page that provide consumer credit counseling. This action step helps address impediments related to improving consumer knowledge of

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mortgage loan options.

Action Step ID	<b>78 Homebuyer Programs Provide Marketing Materials in both English and Spanish</b>		
Begin Date:	6/1/2011 ONGOING	Single Family	
Summary	The Department's Homebuyer programs (Texas Homeownership Program, HOME Homebuyer Assistance, and Bootstrap) engage with Limited English Proficiency (LEP) populations as a normal course of marketing. Marketing materials are available in both English and Spanish for these homebuyer programs. Materials in both languages are taken to presentations and for the Texas Homeownership Program are made available to participating lenders through the My First Texas Home website.		
Action Step ID	<b>97 Housing Trust Fund (HTF) Bootstrap Rule Requirement for Owner-Builder Homeownership Education Classes</b>		
Begin Date:	1/1/1999 ONGOING	Single Family	
Summary	In 1999, Texas Gov't Code Section 2306.756 was created to require Owner-Builders to complete homeownership classes prior to receiving assistance through the Bootstrap Program. These classes are offered in Spanish and English and include content to assist unbanked residents to understand and build credit.		
Action Step ID	<b>103 Colonia Rule Provision Allowing Funds for Credit and Debt Counseling</b>		
Begin Date:	11/1/2012 ONGOING	Single Family	<b>H</b>
Summary	TDHCA's Colonia Self-Help Center rule provision 10 TAC § 25.3(7) (Texas Gov't Code Section 2306.586) allows the use of Community Development Block Grant funds for providing credit and debt counseling related to home purchase and finance. This provision assists unbanked residents in building credit and provides consumers information to better access homeownership and other assistance programs. Colonia Self-Help Centers play an integral role in providing information and education to persons with Limited English Proficiency along the Texas-Mexico border.		
Action Step ID	<b>111 TDHCA Attendance at the Opportunity Forum presented by the University of Texas School of Law: Advancing Homeownership After the Crisis: Opportunities and Challenges in Texas</b>		
Begin Date:	10/22/2014 COMPLETED - 11/4/2014	Single Family	<b>H</b>
Summary	TDHCA attended the Opportunity Forum on Advancing Homeownership After the Crisis, featuring Julia Gordon, Director of Housing Finance and Policy at the Center for American Progress (CAP). Dr. Gordon spoke on stabilizing the housing market and the future of housing finance, with an emphasis on Texas. In her role at CAP, and before that at the Federal Housing Finance Agency and the Center for Responsible Lending, Ms. Gordon has worked on a broad range of housing finance issues, including foreclosure prevention, predatory lending, Fannie Mae and Freddie Mac, and consumer financial protection.		
Action Step ID	<b>134 Development of "Becoming a Homeowner" Online Homebuyer Education Tool</b>		
Begin Date:	9/1/2014 ONGOING	Single Family	
Summary	The Texas Homeownership Program developed a free online homebuyer education module, "Becoming a Homeowner." The two-hour course is available in both English and Spanish. This provides buyers with a greater understanding of what to expect when		



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purchasing a home, including information on the Mortgage Credit Certificate program, down payment assistance, and lending rates. The convenient, self-paced course offers a pre- and post-purchase tutorial on the ins and outs of buying a home. The online course is available at all times. In 2017, 9,200 homebuyers completed the course.

Action Step ID	<b>142 HOME Program Homebuyer Assistance for Low-Income Texans</b>		
Begin Date:	6/1/1993 ONGOING	Single Family	<b>H</b>
Summary	The HOME Program makes available funding for downpayment assistance programs to offer deferred-forgivable 0% interest rate loans for low-income Texans. This facilitates home mortgage loans for households that may have been denied a traditional mortgage loan or that may otherwise be offered a high cost loan.		
Action Step ID	<b>144 Loan Servicing Outreach to Educate Borrowers on Homestead Exemptions, Lower Tax &amp; Insurance Payments, and Increase Affordability</b>		
Begin Date:	7/1/2015 ONGOING	Single Family	<b>H</b>
Summary	The Loan Servicing division of the Department processes tax and insurance payments for TDHCA borrowers. Staff reach out to borrowers that show no homestead exemption on the tax records, and provide information on applying for the exemption to lower tax payments and increase affordability through lower overall mortgage payments. Loan Servicing staff also provide information on other exemptions of which homeowners may be unaware and discuss the household shopping for lower insurance premiums, such as those for households over 65 years old and for people with disabilities.		
Action Step ID	<b>145 Increase Homeownership Opportunities</b>		
Begin Date:	12/1/2015 COMPLETED - 10/1/2016	Single Family	
Summary	In the fall of 2015 TDHCA's master servicer for Texas Homeownership programs put new overlays in place, increasing credit score requirements, increasing debt to income ratio, and eliminating manual underwriting. TDHCA staff worked to counter the impact of this and increase lending options for households at risk for predatory and high cost loans. The Department continues to offer this lending product and worked to finance this option to expand housing choice and opportunity for those most in need of assistance with homeownership.		
Action Step ID	<b>195 Presentation at the Texas Municipal League 2016 Conference</b>		
Begin Date:	8/1/2016 COMPLETED - 10/5/2016	Agency Wide	<b>H</b>
Summary	TDHCA's Executive Director at the time, Tim Irvine, presented at the 2016 Texas Municipal League Conference on a panel entitled Affordable Housing as Economic Development with an intended purpose of combatting NIMBYism. The presentation included information on job creation, positive fiscal impacts for government, improved worker retention, and affordable housing as an investment in children, safe neighborhoods, working families, and opportunity for Texans. The Texas Municipal League serves 1,152 cities across Texas.		

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Action Step ID **202 Agency Wide Biennial Fair Housing Training for Department Staff**

Begin Date: 11/1/2016 ONGOING Agency Wide **H**

Summary Effective April 2017, all TDHCA staff are required to complete a fair housing training module biennially. New hires will complete the training within the first 90 days of employment. TDHCA’s human resources manual was updated to include this training requirement; this will be monitored by the human resources division. The HUD-approved training is provided online through the Texas Workforce Commission, Civil Rights Division. In 2017 agency staff took the fair housing training offered through the Texas Workforce Commission. In both 2017 and 2018 all staff had the opportunity to attend two fair housing webinars.

Action Step ID **208 Participation in the State of Texas Reentry Task Force**

Begin Date: 6/19/2009 ONGOING Agency Wide **H**

Summary A member of the fair housing team participates in the State of Texas Reentry Task Force and quarterly meetings. Texas’s statewide Reentry Task Force promotes increased collaboration and coordination among localized re-entry initiatives and state-level entities, specifically in efforts to help stakeholders minimize barriers that impact individuals’ successful reintegration into Texas communities. The Texas Reentry Task Force was established through House Bill 1711 and became effective June 19, 2009 through Texas Gov’t Code §501.098. Having a criminal record is not a protected characteristic under the Fair Housing Act, however, criminal history-based restrictions on housing opportunities may violate the Act if, without justification, their burden falls more often on renters or other housing market participants of one race or national origin over

Action Step ID **231 Development of §20.9 Fair Housing, Affirmative Marketing and Reasonable Accommodations**

Begin Date: 12/15/2015 COMPLETED - 8/24/2017 Single Family **H**

Summary The single family affirmative marketing rule was revised and expanded in 10 TAC §20.9 Fair Housing, Affirmative Marketing and Reasonable Accommodations. The rule applies to state and federal funds and requires administrators to have an Affirmative Marketing Plan which identifies the least likely to apply populations and outreach methods to reach those populations. Under 20.9 administrators are required to accept applications from households for a minimum of a 30 calendar period and select households to be assisted using a neutral, random selection process. After Administrators have allowed for a 30 calendar day period to accept applications and used a neutral random selection process to assist Households, they may accept applications on a first-come, first-served basis. Administrators must also have a Language Assistance Plan that ensures persons with Limited English Proficiency have meaningful and equal access to participate in services, activities, programs and other benefits. The rule was approved at the July 27, 2017, board meeting and applies to new contracts awarded after the rule effective date of

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### Action Step ID **232 Creation of a Single Family Programs Affirmative Marketing Tool**

Begin Date: 7/1/2016 COMPLETED - 9/13/2017 Single Family **H**

Summary Staff built a tool to comply with 10 TAC §20.9 Fair Housing, Affirmative Marketing and Reasonable Accommodations. The tool identifies the least likely to apply populations by program activity type (homebuyer, rehabilitation, or rental assistance) and region. It works by comparing Census Demographic Data from the American Community Survey (2011-2015) to all single-family households served during calendar years 2006-2015. For a group to be underrepresented, the percentage of the households belonging in the group served in the Housing Contract System is at least 20% less than the percentage of the same group representation in the region. Administrators may use the Department’s tool to identify the least likely to apply populations, or another method. If another method is used administrators must provide a detailed explanation of the methodology used. Staff

### Action Step ID **233 Webinar, Single Family Programs: Fair Housing & Affirmative Marketing Under 10 TAC § 20.9**

Begin Date: 7/1/2017 COMPLETED - 11/2/2017 Single Family **H**

Summary The Department hosted a webinar training for single family program administrators of the HOME Investment Partnerships Program, State Housing Trust Fund, Neighborhood Stabilization Program, Amy Young Barrier Removal Program, Colonia Self Help Centers, and Texas Bootstrap Loan Program on the new Fair Housing, Affirmative Marketing and Reasonable Accommodations rule (10 TAC 20.9). The presentation addressed highlights of the new rule, demonstrated the single family affirmative marketing tool, and provided examples to help guide best practices.

### Action Step ID **242 Provided a Webinar with a Fair Housing Overview to Celebrate Fair Housing Month 2018**

Begin Date: 11/1/2017 COMPLETED - 4/10/2018 Agency Wide **H**

Summary The Department, in conjunction with the Texas Workforce Commission’s Civil Rights Division, hosted a webinar during April 2018's 50th Anniversary of the Fair Housing Act on April 10, 2018. Topics covered included protected classes, discriminatory practices, exemptions, and fair housing testing. Participants had a chance to apply their knowledge in a review of case scenarios. This webinar had more than 400 participants.

### Action Step ID **243 Texas Statewide Homebuyer Education Program (TSHEP)**

Begin Date: 9/1/1997 ONGOING Single Family

Summary In 1997, the 75th Texas Legislature passed HB 2577, which charged TDHCA with the development and implementation of a statewide homebuyer education program, designed to provide information and counseling to prospective homebuyers about the home buying process. The Texas Statewide Homebuyer Education Program (TSHEP) was created to fulfill this mandate. To ensure uniform quality of the homebuyer education provided throughout the state, TDHCA partnered with NeighborWorks America, a nationally recognized organization, to administer TSHEP as a train-the-trainer program and to teach local nonprofit organizations the principles and applications of comprehensive pre- and post purchase homebuyer education, and to certify participants as providers of homebuyer training. To date approximately 731 individuals have been certified as homebuyer

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education providers by the Texas Statewide Homebuyer Education Program.

Action Step ID

**244 Created Glossary of Mortgage Terms**

Begin Date:

6/1/2005 COMPLETED - 10/1/2016

Single Family

Summary

The Department's homebuyer webpage includes a glossary of mortgage terms for use by consumers and prospective homebuyers. The glossary helps consumers understand terms such as points, private mortgage insurance, amortization, and earnest money. This action step helps address impediments related to improving consumer knowledge of mortgage loan options. Staff periodically update the glossary of mortgage terms as needed, the last update was completed in 2016.

**Impediment 5 Lack of accessible housing and visitability standards limits fair housing choice for persons with disabilities.**

Action Step ID	<b>7 Development of 2013 Qualified Allocation Plan (QAP) Scoring Incentives for Development in High Opportunity Areas</b>		
Begin Date:	6/1/2012 COMPLETED - 1/1/2013	Multifamily	
Summary	To take steps to improve the availability of accessible housing in more areas, in 2013 TDHCA implemented a series of scoring items to facilitate the development of tax credit properties in high opportunity areas. The scoring items included an opportunity index with the highest scoring options for locating developments in census tracts with low poverty rates (less than 15%), high household incomes, and high elementary school performance ratings (as reported by the Texas Education Agency). A second scoring item known as "Educational Excellence" provided additional points for locating developments in areas that also have high quality middle and high schools. These items were updated in each subsequent QAP. Continuing to refine the scoring in the QAP through a fair housing perspective occurs annually. Fair housing staff participate in QAP roundtable discussions. Staff researched potential scoring items, changes in Texas Education Agency educational standards, regional scores, updated poverty and income census data, and mapped data to determine eligible tracks and potential patterns.		
Action Step ID	<b>13 Consolidated Plan Review and Contributions</b>		
Begin Date:	5/2/2014 ONGOING	Agency Wide	<b>H</b>
Summary	The Fair Housing Team assists the Housing Resource Center each year in reviewing and drafting sections of the Consolidated Plan in accordance with recommendations made during the Analysis of Impediments process. The Team contributes information and feedback on goals and steps to be taken as a result of identified needs and barriers.		
Action Step ID	<b>14 Section 811 Project Rental Assistance (PRA) Round 2 Application</b>		
Begin Date:	5/6/2014 COMPLETED - 6/1/2014	Single Family	<b>H</b>
Summary	The Section 811 Project Rental Assistance group applied for Round 2 PRA 811 funds in an effort to acquire additional funds to support initiatives to increase housing options for persons with disabilities in the existing TDHCA multifamily portfolio. The second 811 grant was awarded for an additional \$12 million for the program.		
Action Step ID	<b>20 TDHCA Fair Housing Accessibility First Construction and Compliance Training</b>		
Begin Date:	5/29/2014 COMPLETED - 5/29/2017	Agency Wide	<b>H</b>
Summary	In coordination with the other state agencies who receive CPD funds and the Texas Affiliation Of Affordable Housing Providers (TAAHP), TDHCA coordinated a Fair Housing Accessibility First Construction and Compliance training offered by Jack Catlin (HUD approved trainer) and industry expert, LCM Architects in May 2017.		

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Action Step ID	<b>21 TDHCA 2010 Americans with Disabilities Act (ADA) Standards Training</b>		
Begin Date:	5/30/2014 COMPLETED - 5/30/2014	Agency Wide	<b>H</b>
Summary	In January 2014 following the release of guidance from the Department of Justice, TDHCA adopted the 2010 ADA construction standards for Section 504 compliance. TDHCA's Compliance Division hosted a 2010 ADA training and invited property management, owners, engineers, architects, and the general public.		
Action Step ID	<b>34 Increase of Project Access Voucher Allocations</b>		
Begin Date:	1/1/2012 COMPLETED - 1/1/2014	Single Family	<b>H</b>
Summary	Project Access vouchers were increased from 100 in 2012 to 140 in 2014 to maximize the amount of assistance provided to low income households with an individual with a disability. Project Access serves individuals exiting nursing facilities, intensive care facilities, and board and care facilities statewide. The waiting list fluctuates in size and continues to assist persons transitioning out of facilities into community based settings. As of February 2018 there were 145 applicants on the waiting list.		
Action Step ID	<b>35 Project Access Pilot Program with Texas Health and Human Services Commission (HHSC) and Texas Department of State Health Services (DSHS)</b>		
Begin Date:	6/1/2001 ONGOING	Single Family	<b>H</b>
Summary	In working with local stakeholders and examining the needs of tenants with disabilities across the state, the Section 8 Program Area created the Project Access Pilot, in which 10 of 140 vouchers offered through Project Access are made available in partnership with Texas DSHS and HHSC to specifically assist persons exiting state psychiatric hospitals. All 10 pilot vouchers are in use as of February 2018, with 51 applicants on the waiting list.		
Action Step ID	<b>36 Section 8 Technical Assistance for Relocation Contracts and the HOME TBRA Bridge</b>		
Begin Date:	9/1/2014 ONGOING	Single Family	<b>H</b>
Summary	Staff created a program policy to encourage the use of HOME Tenant Based Rental Assistance (TBRA) as a bridge to the Project Access program to better assist persons with disabilities and facilitate access to vouchers, including allowing TBRA HOME Administrators to amend their program designs to prioritize individuals residing in institutions and on the Project Access waitlist where a Project Access voucher was not yet available. This change occurred through an amendment to 10 TAC § 5.801. Technical Assistance for Relocation Contractors was also provided so TBRA Administrators could assist in identifying opportunities for transitioning eligible HOME TBRA participants to the Project Access program (which unlike TBRA does not have a time limit on assistance). This program continues and its use fluctuates as the Project Access waiting list fluctuates.		

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Action Step ID	<b>37 TDHCA Sets Aside 5% of HOME funds for Use in Programs Serving Persons with Disabilities (PWD)</b>		
Begin Date:	6/1/2001 ONGOING	Multifamily	<b>H</b>
Summary	Since 2001, the state has set-aside a portion of the annual HOME allocation for use by persons with disabilities, per Texas Government Code 2306.111(c). TDHCA currently reserves 5% for use in PWD activities to encourage better service provision to households with an individual who has a disability across the state and in Participating Jurisdictions. The state also tracks households that voluntarily report that at least one member of their household includes a person with a disability, and that accounts for 15% to 20% of total households served in the HOME program.		
Action Step ID	<b>44 Revision of the Single Family Umbrella Rule to Allow Housing Trust Fund Amy Young Barrier Removal Funds to be used for Manufactured Housing Modifications</b>		
Begin Date:	4/1/2014 COMPLETED - 11/1/2014	Single Family	
Summary	The revision of the Single Family Umbrella Rule for the 2014 Rules Cycle included revised language concerning the use of Federal funds in manufactured housing modifications. The Rule was specifically modified to allow the use of State funded Housing Trust Fund in the Amy Young Barrier Removal Program to be used to modify existing manufactured homes where accessibility features are required to meet the needs of individuals with disabilities. Feedback on this Rule was generated through TDHCA's work with the Housing and Health Services Coordination Council and the Disability Advocacy Workgroup.		
Action Step ID	<b>48 Expansion of Universal Design Elements to Single Family Homeowner Rehabilitation Assistance (HRA) Minimum Construction Standards</b>		
Begin Date:	9/4/2014 COMPLETED - 11/1/2014	Single Family	<b>H</b>
Summary	The Department implemented the Texas Minimum Construction Standards (TMCS) to be effective in January of 2015 to remedy health and safety defects, particularly life threatening deficiencies in all single family programs. TMCS also supports universal design concepts such as accessible doorway considerations when the home is rehabilitated with federal funds. TMCS outlines the minimal level of work required and methods and materials for rehabilitation projects. These programs increase the stock of housing that is available for persons with disabilities.		
Action Step ID	<b>51 Rule Provisions and Statute Require All Multifamily Properties to be Subject to Section 504 as Specified Under 24 CFR Part 8, Subpart C</b>		
Begin Date:	8/1/2012 COMPLETED - 1/4/2013	Multifamily	<b>H</b>
Summary	The State of Texas regulations and TDHCA Rules require all Multifamily TDHCA monitored rental properties to follow Section 504 requirements. Rule provisions are included in statute, the Uniform Multifamily Rules, Chapter 10, Subchapter B, Section 10.101(a)(8), and are reiterated in additional program area rules, notices of funding availability, and in the Compliance Monitoring Rules in Subchapter F. (Cites were those cites at the time this action was taken.)		

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Action Step ID	<b>52 Creation of an Agency Wide Reasonable Accommodation Rule in 10 TAC Section 1.204</b>		
Begin Date:	12/1/2013 COMPLETED - 2/16/2014	Agency Wide	<b>H</b>
Summary	The Reasonable Accommodation Rule was created in 10 TAC Section 1.204 to better align 504 mandates with monitoring goals and provide guidance to single family, multifamily, and community affairs stakeholders regarding laws and implementation of reasonable accommodation practices.		
Action Step ID	<b>56 Expansion of Accessibility Requirements and 20% Minimum New Construction Standard for Multifamily Properties</b>		
Begin Date:	12/29/2017 COMPLETED - 12/29/2017	Multifamily	
Summary	The Uniform Multifamily Rules Subchapter B, Section 10.101(8)(B), were revised to expand accessibility requirements to multifamily developments not normally subject to Fair Housing requirements and require that a minimum of 20% of each unit type provide accessible entry levels, including a minimum of one bedroom and bathroom or powder room at entry level, and provision of all common use facilities in compliance with Fair Housing guidelines. This rule ensures that even small size new construction developments will be subject to Department and Fair Housing accessibility rules.		
Action Step ID	<b>61 Uniform Multifamily Rule Provision to Treat All Rehabilitation as Substantial Alteration</b>		
Begin Date:	11/7/2013 COMPLETED - 1/16/2014	Multifamily	<b>H</b>
Summary	The rule provision was revised to require that all applications proposing rehabilitation (including reconstruction) be treated as substantial alteration. The inclusion of this provision requires any developer to make 2% of units accessible to persons with vision and hearing impairments and 5% of units accessible to persons with mobility impairments as part of the development's improvements.		
Action Step ID	<b>86 Disability Advisory Workgroup (DAW)</b>		
Begin Date:	11/14/2001 ONGOING	Agency Wide	<b>H</b>
Summary	On November 13, 2001 the Department's Board authorized the Disability Advisory Committee to provide information and recommendations to the Board on the housing needs of people with disabilities. In 2006 this group evolved into the DAW to provide staff with guidance. The DAW is organized by staff from the Housing Resource Center in coordination with Executive guidance. Representatives from TDHCA's HOME, Project Rental Assistance 811 Program, Housing Resource Center, Housing Trust Fund, Multifamily, and Section 8 areas attend the DAW to discuss relevant issues and gather feedback on policies and rulemaking that may impact persons with disabilities.		
Action Step ID	<b>87 Single Family HOME Homeowner Rehabilitation Assistance (HRA) Allowance of Additional Funds for Accessible Features</b>		
Begin Date:	5/7/2015 COMPLETED - 7/30/2015	Single Family	<b>H</b>
Summary	The HRA section of the single family HOME Rules allows for up to \$5,000 in direct costs in excess of the program maximum to be requested for homeowners requesting accessible features. This rule appeared in 10 Texas Administrative Code § 23.31(e)(3).		



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Action Step ID **88 Single Family HOME Homebuyer Assistance Program (HBA) Additional Assistance for Homebuyers Needing Accessible Features**

Begin Date: 12/12/2013 COMPLETED - 12/12/2013 Single Family H

Summary The single family HOME HBA and Contract for Deed rules allow expanded use for acquisition and rehab for homebuyers needing accessibility modifications (modifications may be made inside or outside the property, such as an accessible walkway). Persons with disabilities are eligible for up to \$20,000 in hard costs and \$5,000 in soft costs to meet these needs under 10 TAC § 23.31 and 10 TAC § 23.51 respectively.

Action Step ID **89 Single Family HOME Contract For Deed (CFD) and Single Family Development (SFD) Allow Additional Assistance for Persons Requesting Accessible Features**

Begin Date: Completed Date Unavailable Single Family H

Summary The single family HOME CFD and SFD rules allow for an additional \$5,000 in direct cost funds requested for recipients if the household requests accessibility features.

Action Step ID **93 Section 811 Project Rental Assistance Program (PRA) Grant and Implementation, Providing Tenant Choice and Assisting Persons with Disabilities**

Begin Date: 9/19/2011 Completed Date Unavailable Single Family H

Summary The Department, in partnership with the Texas Health and Human Services Commission (HHSC), successfully applied under HUD's Section 811 PRA Demonstration program to receive a grant to assist the Department in offering additional housing options for persons with disabilities through project-based rental assistance utilized in its multifamily programs properties. The program is targeted towards people with disabilities living in institutions, people with serious mental illness, and young adults with disabilities existing foster care. To maximize tenant choice, while still ensuring the units are fully-integrated into the community, the Department is recruiting properties to participate by creating incentives for multifamily developers that are participating in TDHCA's Multifamily Housing Programs and qualified properties outside the TDHCA portfolio. TDHCA was awarded \$24,342,000 to administer the program.

Action Step ID **98 Housing Trust Fund (HTF) Amy Young Barrier Removal Program Marketing in Spanish and English**

Begin Date: 9/1/2011 ONGOING Single Family

Summary The HTF Amy Young Barrier Removal Program markets the program in both Spanish and English to better reach persons with disabilities in underserved areas of the state and reduce barriers created by Limited English Proficiency.

Action Step ID **99 Housing Trust Fund (HTF), Operation of the Amy Young Barrier Removal Program**

Begin Date: 1/1/2010 ONGOING Single Family

Summary Beginning in 2010, TDHCA established the Amy Young Barrier Removal Program to specifically serve persons with disabilities seeking to modify their homes to meet their accessibility needs. Nonprofit and local governments process intake applications, determine eligibility, and oversee construction for eligible households across the state. Assistance is in the form of construction

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grants of up to \$20,000 for both renters and homeowners under 80% area median family income.

Action Step ID	<b>108</b>	<b>Revision of the Fair Housing Training Component for the Amy Young Barrier Removal Program Administrator's Training</b>		
Begin Date:	10/10/2014	COMPLETED - 10/22/2014	Single Family	
Summary	The Amy Young Barrier Removal Program Administrator's Training slides covering Fair Housing and Section 504 requirements were reviewed and updated by program staff with the help of the Fair Housing Team. The Fair Housing Team Lead attended the workshop presentation on Fair Housing and was available for questions by program administrators.			
Action Step ID	<b>127</b>	<b>Research Notification Process between TDHCA, Internal Revenue Service, and the US Department of Housing and Urban Development or Texas Workforce Commission, Ensure Compliance with Memorandum of Understanding</b>		
Begin Date:	10/1/2015	COMPLETED - 7/1/2016	Agency Wide	<b>H</b>
Summary	Ensure communication of 'cause' findings between Texas Workforce Commission, and TDHCA, per the memorandum of understanding between the US Department of Housing and Urban Development, the Department of Justice, and the Internal Revenue Service.			
Action Step ID	<b>129</b>	<b>Analyze TDHCA Programs Assisting Persons with Disabilities (PWD), Data Reported and Need in Texas</b>		
Begin Date:	2/22/2016	COMPLETED - 6/2/2016	Multifamily	<b>H</b>
Summary	Analyzed funding provided to persons with disabilities through TDHCA's rental assistance, homebuyer assistance, and homeowner repair programs. Staff analysis of Census data found 15% of individuals below poverty level in Texas have a disability. Persons with disabilities, as reported to TDHCA, comprised 14.3% of all households served through TDHCA down-payment assistance, rental assistance, and home rehabilitation programs between 2010-2014 calendar year and 16.6% of funding (disability status is not disclosed for households assisted through the single family bond homeownership programs). This data aids staff in determining appropriate outreach strategies and changes in program design to meet the needs of persons with disabilities. TDHCA does not require applicants to disclose certain household characteristics, such as disability status, unless those characteristics are related to eligibility requirements. TDHCA knows through voluntary reporting that households with a disability are served by programs other than those specifically designed for people with disabilities. Fair housing staff presented the data analysis at the Department's May 11, 2016 Disability Advisory Workgroup meeting.			
Action Step ID	<b>132</b>	<b>Housing and Services Partnership Academy Hosted by Housing and Health Services Coordination Council (HHSCC)</b>		
Begin Date:	8/1/2014	COMPLETED - 2/10/2016	Agency Wide	<b>H</b>
Summary	Department staff coordinated the Housing and Services Partnership Academy to promote Service Enriched Housing (SEH) in Texas. SEH is defined as integrated, affordable, and accessible housing that provides residents with the opportunity to receive on-site or off-site health-related and other services and supports that foster independence in living and decision-making for individuals with disabilities and persons who are elderly. The academy consisted of teams throughout the state including persons with disabilities, public housing authorities, local governments, developers, centers for independent living, and faith			

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based organizations. The topics addressed in the academy included a tenant/consumer panel; an overview of new construction and rehabilitation development processes; identifying and securing existing units for SEH; round table sessions on housing and services programs; peer presentations; and team planning sessions.

Action Step ID	<b>138 Section 811 Project Rental Assistance Grant, Providing Tenant Choice and Assisting Persons with Disabilities</b>		
Begin Date:	8/1/2015 ONGOING	Single Family	<b>H</b>
Summary	TDHCA was awarded \$24,342,000 to administer the Section 811 Project Rental Assistance Program, which provides project-based rental assistance for extremely low-income persons with disabilities linked with long term services. The program is targeted towards people with disabilities living in institutions, people with serious mental illness, and youth with disabilities existing foster care. To maximize tenant choice, while still ensuring the units are fully-integrated into the community, the Department is recruiting properties to participate by creating incentives for multifamily developers that are participating in TDHCA's Multifamily Housing Programs and qualified properties outside the TDHCA portfolio.		
Action Step ID	<b>147 Provide the Housing and Health Services Coordination (HHSC) Council with Updates on the Affirmatively Furthering Fair Housing (AFFH) Rule</b>		
Begin Date:	3/15/2016 COMPLETED - 4/13/2016	Agency Wide	<b>H</b>
Summary	Fair housing staff attended the HHSC Council meeting and provided updates on HUD's new AFFH rule and Assessment of Fair Housing tool for states.		
Action Step ID	<b>156 Multifamily Direct Loan Program, Set-Aside for Supportive Housing or Units for Very Low-Income Households</b>		
Begin Date:	3/22/2016 IN PROGRESS	Multifamily	<b>H</b>
Summary	The Multifamily Direct Loan Program provides funding to nonprofit and for-profit entities for the new construction or rehabilitation of affordable multifamily rental developments (10 TAC §13). The 2017-1 Notice of Funding Availability (NOFA) includes a \$8,310,529 set-aside for soft repayable and/or deferred forgivable loans. Developments may qualify by meeting the Department's Supportive Housing definition or by creating units for households at 30% area median income (AMI) that would not be available otherwise. Funds under this set-aside are intended to increase the number of 30% rent-restricted units and occupy them with households with an annual income of 30% AMI or less who are not currently receiving any type of rental assistance. The 2017-1 Multifamily Direct Loan notice of funding availability closed on October 31, 2017. \$2,981,671 in Tax Credit Assistance Program Repayment Funds (TCAP RF) and all \$4,310,529 in Program Year 2016 National Housing Trust Fund (NHTF) funds were awarded to seven applications proposing new construction. The 2018-1 NOFA currently includes \$3,300,000 in TCAP RF and \$19,024,041 in Program Year 2017 and Program Year 2018 NHTF for developments that meet the Department's Supportive Housing definition or create units for households a 30% AMI that would not be available otherwise.		
Action Step ID	<b>157 Inspection Staff Attended National Americans with Disabilities Act Symposium</b>		
Begin Date:	3/29/2016 COMPLETED - 6/22/2016	Agency Wide	<b>H</b>

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Summary	Department staff who perform physical inspections of multifamily properties attended the National Americans with Disabilities Act Symposium. The conference is the most comprehensive training event available on the ADA and disability related laws. The Symposium is designed to provide the latest information on ADA regulations and guidelines, implementation strategies, and best practices. Staff generally attends annually.		
Action Step ID	<b>161</b>	<b>Analyze TDHCA's Assistance by Households and Funds to Persons with a Disability (PWD)</b>	
Begin Date:	3/11/2016 COMPLETED - 6/3/2016	Multifamily	<b>H</b>
Summary	Staff analyzed Census demographics of statewide needs of persons with disabilities and households including a person with disabilities. Staff pulled multifamily data for accessible units and persons with special needs living in TDHCA's multifamily units.		
Action Step ID	<b>181</b>	<b>Revision of the Fair Housing Training Component for the Emergency Solutions Grants (ESG) Implementation Workshop</b>	
Begin Date:	6/10/2016 COMPLETED - 8/9/2016	Single Family	<b>H</b>
Summary	Staff revised presentation materials for the ESG 2016 Implementation Workshop series held in August 2016. The presentation covered fair housing topics including civil rights laws, reasonable accommodations, affirmative outreach, limited English proficiency, language access plans, use of criminal records, and equal access and non-discrimination policies for protected classes. The webinar was presented on August 9, 2016.		
Action Step ID	<b>206</b>	<b>Fair Housing Webinar Series 2017: Webinar One – Fair Housing Overview</b>	
Begin Date:	12/15/2016 COMPLETED - 4/4/2017	Agency Wide	<b>H</b>
Summary	Implementation of a two part webinar series in coordination with the Texas Workforce Commission Civil Rights Division. The presentation covered the basics of fair housing in Texas and a review of case scenarios, including an overview of fair housing testing. Over 500 attendees participated in the webinar. Trainings are geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners.		
Action Step ID	<b>212</b>	<b>Participate in Texas Interagency Council for the Homeless (TICH) Meeting, Provide Fair Housing Update</b>	
Begin Date:	3/1/2017 COMPLETED - 4/11/2017	Single Family	<b>H</b>
Summary	Fair housing staff attended the April TICH meeting and presented an update on fair housing in Texas. Staff provided information on the 2017 fair housing webinar series and invited TICH members to attend. In addition, staff provided an update on HUD's Affirmatively Furthering Fair Housing rule and the State's plans to comply with the new rule and complete an Assessment of Fair Housing.		

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Action Step ID **214 Fair Housing Presentation to Assertive Community Treatment Team with Austin/Travis County Integral Care**

Begin Date: 6/28/2017 COMPLETED - 7/18/2017

Single Family

**H**

Summary The Fair Housing Project Manager conducted a 60-minute in-person training for Austin/Travis County Integral Care staff who use various TDHCA programs including Project Access and Section 811. Assertive Community Treatment, used by those trained, is an Evidence-Based Practice Model designed to provide treatment, rehabilitation and support services to individuals who are diagnosed with a severe mental illness and whose needs have not been well met by more traditional mental health services. The ACT team provides services directly to an individual that are tailored to meet his or her specific needs. ACT teams are multi-disciplinary and include members from the fields of psychiatry, nursing, psychology, social work, substance abuse and vocational rehabilitation. Based on their respective areas of expertise, the team members collaborate to deliver integrated services of the recipients' choice, assist in making progress towards goals, and adjust services over time to meet recipients' changing needs and goals. Presentation materials focused on reasonable accommodations for persons with disabilities and information on HUD's guidance related to criminal background checks.

Action Step ID **231 Development of §20.9 Fair Housing, Affirmative Marketing and Reasonable Accommodations**

Begin Date: 12/15/2015 COMPLETED - 8/24/2017

Single Family

**H**

Summary The single family affirmative marketing rule was revised and expanded in 10 TAC §20.9 Fair Housing, Affirmative Marketing and Reasonable Accommodations. The rule applies to state and federal funds and requires administrators to have an Affirmative Marketing Plan which identifies the least likely to apply populations and outreach methods to reach those populations. Under 20.9 administrators are required to accept applications from households for a minimum of a 30 calendar period and select households to be assisted using a neutral, random selection process. After Administrators have allowed for a 30 calendar day period to accept applications and used a neutral random selection process to assist Households, they may accept applications on a first-come, first-served basis. Administrators must also have a Language Assistance Plan that ensures persons with Limited English Proficiency have meaningful and equal access to participate in services, activities, programs and other benefits. The rule was approved at the July 27, 2017, board meeting and applies to new contracts awarded after the rule effective date of

Action Step ID **236 Department Participation in the Joint Solutions Housing Work Group**

Begin Date: 8/17/2017 ONGOING

Agency Wide

**H**

Summary The Department participates in the Joint Solutions Housing Work Group (JSHWG) consisting of local, state, and federal organizations (including the Federal Emergency Management Agency and HUD) that help perform the critical role of assessing housing needs and long term recovery needs in the wake of a disaster. The JSHWG utilizes all appropriate housing resources available from state and federal agencies, the local government, non-profit community and private sector; communicates and coordinates feasible housing solutions, as families transition to more permanent housing; and maintains a holistic community approach in addressing disaster survivors unmet housing needs. While persons affected by a disaster are not necessarily

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specific members of a protected class the needs of persons impacted by the disaster may differ based on membership in a protected class, such as persons with disabilities. The Department currently chairs the work group.

Action Step ID	<b>237 Compliance Division Comprehensive Portfolio Review of Policies and Procedures</b>		
Begin Date:	10/27/2017 ONGOING	Multifamily	<b>H</b>
Summary	Effective October 24, 2017, the Compliance Division began offering properties in the Department’s portfolio a new approach to review Written Policy and Procedure requirements under 10 TAC §10.610. These policies and procedures include tenant selection criteria, reasonable accommodations policy, wait list policy, denied applicant policy, non-renewal and/or termination policy, and unit transfer policy. Owners may elect to have these policies reviewed for their entire portfolio at once rather than having them reviewed for each individual property as part of the onsite monitoring review process. The Department hopes that the new procedure will better serve owners and management companies by streamlining the process in which they are reviewed, and ensuring equitable applicability of requirements, while ensuring compliance with Department rules. Once approved, the policies will not be reviewed again until either they are revised, or 10 TAC §10.610 is amended. If neither of the events occurs, the Written Policy and Procedures will be reviewed every three years. Application fees will continue to be		
Action Step ID	<b>238 Request to Create Fund to Mitigate Damages Caused by Tenants in the Section 811 Program</b>		
Begin Date:	3/1/2018 ONGOING	Single Family	<b>H</b>
Summary	The Department through Money Follows the Person Demonstration funds provided by Texas Health and Human Services (HHS) requested and was awarded funding to cover the cost of unreimbursed damages caused by Section 811 PRA Program tenants as a result of their occupancy. The funds, \$75,000 will be used on an as-needed basis if a tenant participating in the Section 811 PRA Program incurs eligible expenses. Damage claims are limited, and will only be used to cover itemized, unreimbursed costs for damages resulting directly from the tenant’s occupancy.		
Action Step ID	<b>239 Revised Multifamily Accessibility Requirements Requiring Visitability</b>		
Begin Date:	7/1/2017 COMPLETED - 1/3/2018	Multifamily	<b>H</b>
Summary	The Uniform Multifamily Rules Subchapter B, Section 10.101(8)(B) were revised. Under the revised standards regardless of building type, all units accessed by the ground floor or by elevator "affected units" must comply with the visitability requirements. Visitability requirements include to provide accessible entry levels, including a minimum of one bathroom or powder room at entry level, and provision of all common use facilities in compliance with Fair Housing guidelines.		
Action Step ID	<b>240 HOME Allowance for Additional Funds for Accessible Features</b>		
Begin Date:	8/1/2017 COMPLETED - 8/3/2017	Single Family	<b>H</b>
Summary	The HOME Program under Homeowner Rehabilitation (HRA), Contract for Deed, and Single Family Development activities permits up to \$10,000 in direct costs in excess of the program maximum to be requested for homeowners requesting accessible features and for large families. This rule appears in HOME rules, 10 TAC § 23.31 (d)(1), § 23.31(e)(3), § 23.71(f)(1), §23.71(g)(3),		

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§23.51(f)(2), § 23.51(g)(3).

Action Step ID	<b>246 Streamlined Communications with Partner Public Housing Authorities for Section 8 Voucher Porting</b>		
Begin Date:	6/1/2013 ONGOING	Single Family	<b>H</b>
Summary	Section 8 program staff have streamlined communications with numerous large Public Housing Authorities (PHAs) to which Department voucher households frequently request a port (transfer). Staff have developed relationships with our largest port recipient PHA's to understand and discuss policies and rules for porting households. Because households that wish to port must re-qualify for the program and may encounter issues with the background check or other criteria, staff now communicates these possible barriers and options to households prior to porting.		
Action Step ID	<b>250 Provided a Webinar on Reasonable Accommodations and Accessibility to Celebrate Fair Housing Month 2018</b>		
Begin Date:	4/1/2018 COMPLETED - 4/17/2018	Agency Wide	<b>H</b>
Summary	The Department, in conjunction with the Texas Workforce Commission's Civil Rights Division, hosted webinars during April 2018's 50th Anniversary of the Fair Housing Act on April 17, 2018. Topics covered included reasonable accommodations, service and assistance animals. This webinar had over 300 participants.		
Action Step ID	<b>251 The 811 Program Design Promotes Choice and Integration for Persons with Disabilities</b>		
Begin Date:	2/19/2013 ONGOING	Single Family	<b>H</b>
Summary	The Section 811 Project Rental Assistance (PRA) Program exclusively serves people with disabilities who are also part of the Section 811 target population, and have extremely low-incomes. The target population includes people transitioning out of institutions, persons with severe mental illness and young adults aging out of foster care. The Section 811 PRA program creates the opportunity for persons with disabilities to live as independently as possible through the coordination of voluntary services and providing a choice of subsidized, integrated rental housing options. The program requires that Section 811 units be		
Action Step ID	<b>252 The 811 Program Design Maximizing Tenant Choice</b>		
Begin Date:	2/19/2013 ONGOING	Single Family	<b>H</b>
Summary	The Section 811 Project Rental Assistance (PRA) Program is designed to maximize tenant choice by garnering commitments from properties through the Department's Multifamily Program Applications. The Department has secured funding from HUD for approximately 750 units, but is creating a potential unit universe that far exceeds 750 within the eight metropolitan areas. This universe of eligible units allows members of the target population to select which units and properties themselves by indicating which properties they are interested in when applying for the program. TDHCA's Medicaid state agency partners and local referral agents are responsible for generating referrals to the program. These disability service professionals have received fair housing training and materials and have been instructed on how to comply with program requirements related to fair housing.		
Action Step ID	<b>253 The 811 Program Operates in Areas of Greatest Need for Targeted Populations</b>		
Begin Date:	2/19/2013 COMPLETED - 12/31/2016	Single Family	<b>H</b>

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Summary	The Section 811 Project Rental Assistance (PRA) Program operates in eight different metropolitan statistical areas ( MSAs). The Section 811 PRA Program’s list of eligible MSAs were selected because those areas have demonstrated demand from the target populations.		
Action Step ID	<b>261</b>	<b>Internal Fair Housing Training for Housing Choice Voucher Section 8 Program Staff</b>	
Begin Date:	2/28/2018 COMPLETED - 5/9/2018	Single Family	<b>H</b>
Summary	Fair housing staff, in collaboration with the legal division, conducted a two-hour training for the Housing Choice Voucher Section 8 Program staff. The training covered protected classes, reasonable accommodations, accessibility rules in multifamily properties, HUD guidance on the use of criminal records in housing transactions, and reviewed the Section 8 program administrative plan. Program area staff discussed specific concerns related to occupancy standards, housing choice, and		
Action Step ID	<b>263</b>	<b>Readoption of the Service Enriched Housing Rule</b>	
Begin Date:	4/17/2018 COMPLETED - 12/31/2018	Agency Wide	<b>H</b>
Summary	Texas Government Code §2306.1091(b) requires the Department, with the advice and assistance of the Housing and Health Services Coordination Council (Council), to define Service-Enriched Housing. Staff consulted with the Council at the meeting on May 4, 2018, and the Council supported the readoption of the rule without changes. Service-Enriched Housing is defined in 10 TAC §1.11 as integrated, affordable, and accessible housing that provides residents with the opportunity to receive on-site or off-site health-related and other services and supports that foster independence in living and decision-making for individuals with disabilities and persons who are elderly. Staff anticipates presenting the rule for consideration by TDHCA’s board on		
Action Step ID	<b>264</b>	<b>Revised Integrated Housing Rule to Provide Integrated Affordable Housing</b>	
Begin Date:	4/13/2018 COMPLETED - 12/31/2018	Multifamily	<b>H</b>
Summary	Texas Government Code §2306.111(g) directs that the Department’s funding priorities should provide that funds are awarded, when feasible, based on a project’s ability to provide integrated affordable housing. In spring 2018, staff discussed proposed rule changes to the Integrated Housing Rule with the Department’s Disability Advisory Workgroup twice, and with the Housing and Health Services Coordination Council and the Qualified Allocation Plan Roundtable. Additionally, an Online Survey and Online Forum were conducted April 26, 2018, through May 7, 2018. Stakeholders believed there was a continuing need for the Department’s Integrated Housing Rule under 10 TAC §1.15 to provide assurance that the properties and programs funded by the Department produce integrated housing opportunities. Under an order to adopt the repeal and an order to adopt the new Integrated Housing Rule, the maximum set aside of units for households with disabilities would be 25% in developments with 50 or more units and 36% in developments with fewer than 50 units. This rule was originally established in 2003 in collaboration with disability advocates and program participants. The rule ensures that housing developments that are subject to the rule do not restrict occupancy solely to households with disabilities, with a maximum integration limit dependent on the size of the housing development. Staff anticipates presenting the rule for adoption to TDHCA’s Governing board at its meeting on		



**Impediment 6 There are barriers to mobility and free housing choice for protected classes.**

Action Step ID	<b>1 Development of a Revised Multifamily Affirmative Fair Housing Marketing Rule</b>		
Begin Date:	6/6/2014 COMPLETED - 4/1/2015	Multifamily	<b>H</b>
Summary	Development of a revised rule for Multifamily Affirmative Fair Housing Marketing through 10 TAC §10.617, Affirmative Marketing Requirements (cite at the time this action was taken). The new rule guides owners and managers in identifying "least likely to apply" populations using HUD's definition of minority concentration and seeks to clarify and expand on HUD's definition of a "market area." The Department hosted roundtables for feedback and created a tool to assist in comparing tenant pool data (or in the case of new construction developments, census tract demographic data) to MSA or County demographic census data. The tool is web based and has been effective in helping properties better strategize in affirmative marketing.		
Action Step ID	<b>2 Internal Program and Monitoring Area Reviews</b>		
Begin Date:	4/22/2014 ONGOING	Agency Wide	<b>H</b>
Summary	Department program and monitoring areas are reviewed for developments in Fair Housing. Meetings are held with Division Directors to discuss current efforts and potential goals of program areas. Guiding documents of the program area are reviewed, collected demographic data was discussed, and initial action steps are identified. This type of review is ongoing and all guiding documents, rules, and plans are reviewed from this perspective.		
Action Step ID	<b>3 Development of a Fair Housing Tracking Database</b>		
Begin Date:	4/22/2014 COMPLETED - 7/31/2014	Agency Wide	<b>H</b>
Summary	The Fair Housing Tracking database was created to track agency goals, efforts, and progress made under the Phase 2 Analysis of Impediments (AI). The Fair Housing Tracking database provides the Department with an ability to pull basic metrics and provide reports by AI Goals, Impediments, Action Items, and other meaningful search criteria. Such abilities assist the state in identifying areas of improvement and success under its HUD-related obligation to affirmatively further fair housing choice. The design of the database was completed in 2014; however, the content of the database is maintained on an ongoing basis.		
Action Step ID	<b>7 Development of 2013 Qualified Allocation Plan (QAP) Scoring Incentives for Development in High Opportunity Areas</b>		
Begin Date:	6/1/2012 COMPLETED - 1/1/2013	Multifamily	
Summary	To take steps to improve the availability of accessible housing in more areas, in 2013 TDHCA implemented a series of scoring items to facilitate the development of tax credit properties in high opportunity areas. The scoring items included an opportunity index with the highest scoring options for locating developments in census tracts with low poverty rates (less than 15%), high household incomes, and high elementary school performance ratings (as reported by the Texas Education Agency). A second scoring item known as "Educational Excellence" provided additional points for locating developments in areas that also have high quality middle and high schools. These items were updated in each subsequent QAP. Continuing to refine the scoring in the QAP through a fair housing perspective occurs annually. Fair housing staff participate in QAP roundtable discussions. Staff		

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researched potential scoring items, changes in Texas Education Agency educational standards, regional scores, updated poverty and income census data, and mapped data to determine eligible tracks and potential patterns.

Action Step ID	<b>8</b>	<b>Expansion of Ineligible Adverse Site and Area Characteristics in Multifamily Activities</b>		
Begin Date:	7/1/2013	COMPLETED - 11/15/2013	Multifamily	<b>H</b>
Summary	To improve the siting of affordable accessible housing, in 2013 the criteria for what constituted site ineligibility characteristics were expanded. The rule covered proximity to ineligible neighborhood features including blight, high crime, heavy industrial facilities, and other characteristics in the area which may not be appropriate for residential development. The rule required disclosure of such features for any multifamily applications for funding rehabilitation of an existing property or new construction. The rule resulted in improved neighborhood conditions or appropriate mitigation measures for tenants. These criteria are evaluated annually and updated as needed.			
Action Step ID	<b>9</b>	<b>Review and Revision of TDHCA's Language Assistance Plan</b>		
Begin Date:	4/22/2014	COMPLETED - 8/1/2014	Agency Wide	<b>H</b>
Summary	The Language Assistance Plan was completed and will be periodically revisited. In February 2015, TDHCA secured two contracts for third party interpretation and translation services - one for Spanish language services, and one for all other languages. The agency will roll out translated documents and resources as deemed necessary in the Language Access Plan.			
Action Step ID	<b>10</b>	<b>Housing and Health Services Coordination Council (HHSCC) and TDHCA Creation of Rental Assistance Video Series</b>		
Begin Date:		COMPLETED - 9/26/2014	Agency Wide	<b>H</b>
Summary	To improve the availability of information, the HHSCC and TDHCA collaborated on a short video series to educate the public on fair housing (including reasonable accommodations), homebuyer assistance, rental assistance, energy assistance, home repair, emergency assistance, and service enriched housing. The short video series is available on TDHCA's website and is used to engage and inform the public. From March 2015 to March 2017 there were nearly 1,000 page views on TDHCA's webpage with the video series.			
Action Step ID	<b>12</b>	<b>Development of a Demographic Collection Database</b>		
Begin Date:	4/16/2014	COMPLETED - 4/30/2015	Multifamily	<b>H</b>
Summary	Because of the wide array of service provision systems used by TDHCA staff, the mechanism for capturing the demographic data of all multifamily households served by various program areas was created. The database serves Multifamily programs for purposes of better program planning and policy provision and to evaluate progress towards the goals identified in the Analysis of Impediments. Staff continues to look at demographics during program design across all of its programs. Staff continue to update the database, adding Census tract information into multifamily properties in the Compliance Monitoring and Tracking			
Action Step ID	<b>13</b>	<b>Consolidated Plan Review and Contributions</b>		
Begin Date:	5/2/2014	ONGOING	Agency Wide	<b>H</b>

## TDHCA Fair Housing Action Steps by Impediment

Summary	The Fair Housing Team assists the Housing Resource Center each year in reviewing and drafting sections of the Consolidated Plan in accordance with recommendations made during the Analysis of Impediments process. The Team contributes information and feedback on goals and steps to be taken as a result of identified needs and barriers.		
Action Step ID	<b>14 Section 811 Project Rental Assistance (PRA) Round 2 Application</b>		
Begin Date:	5/6/2014 COMPLETED - 6/1/2014	Single Family	<b>H</b>
Summary	The Section 811 Project Rental Assistance group applied for Round 2 PRA 811 funds in an effort to acquire additional funds to support initiatives to increase housing options for persons with disabilities in the existing TDHCA multifamily portfolio. The second 811 grant was awarded for an additional \$12 million for the program.		
Action Step ID	<b>15 Establishment and Ongoing Meeting of State Agency Fair Housing Workgroup</b>		
Begin Date:	5/6/2014 ONGOING	Agency Wide	<b>H</b>
Summary	A workgroup comprised of state agencies involved in fair housing issues was established. The workgroup includes Texas Department of Agriculture, TDHCA, Texas Workforce Commission, General Land Office, and Department of State Health Services. The workgroup was established to assist state agencies in aligning fair housing efforts, including efforts associated with the Analysis of Impediments, considering ways to improve fair housing education and outreach across the state, and developing consistency in complaint direction, training, and resource provision. The workgroup is working jointly on the implementation of the new state fair housing planning document. The workgroup has been meeting since May 2014, and continues to meet		
Action Step ID	<b>16 Memorandum of Understanding with the Texas Workforce Commission</b>		
Begin Date:	5/13/2014 ONGOING	Agency Wide	<b>H</b>
Summary	The current memorandum of understanding (MOU) between TDHCA and Texas Workforce Commission (TWC) was reviewed and revised to add the opportunity for improved training collaboration and complaint direction. MOU requirements for mandated reporting in the event of uncorrected fair housing violations were strengthened and the expectation for information on reported violations and settlements was clarified. TDHCA and TWC continue to work together closely, sharing information and referrals as outlined in the MOU.		
Action Step ID	<b>18 Development of a Revised Tenant Selection Rule</b>		
Begin Date:	5/22/2014 COMPLETED - 4/1/2015	Multifamily	<b>H</b>
Summary	Tenant Selection Criteria can greatly affect the demographic mix of a property and the fair housing choice of protected classes. The rule in Subchapter F of the Uniform Multifamily Rules was reviewed, feedback was collected from the property community, advocacy groups were consulted, a large scale review of plans collected during onsite monitoring were analyzed, and other State Housing Finance Agencies policies were researched. The revised rule clarifies fair housing and reasonable		
Action Step ID	<b>22 Research on Qualified Census Tract (QCT) Data and the Housing Tax Credit Portfolio</b>		
Begin Date:	4/25/2014 COMPLETED - 6/3/2014	Multifamily	

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Summary	Department staff evaluated data to identify whether patterns existed that may have correlated higher scoring items with the funding of developments not located in QCTs. In addition to gathering data on how many portfolio properties were funded in a QCT in past allocation cycles, additional data was collected on any other noted trends, such as non-profit developers receiving property tax exemptions, at risk set aside developments, and amounts of multifamily HOME funds. This type of research		
Action Step ID	<b>23</b>	<b>Creation of TDHCA Fair Housing Marketing Guidelines</b>	
Begin Date:	6/1/2012 COMPLETED - 1/8/2013	Agency Wide	<b>H</b>
Summary	The Division of Policy and Public Affairs created a TDHCA Fair Housing Marketing Guidelines booklet concerning items such as: Inclusion of information on how to request reasonable accommodations on all publicly distributed event notices (including for persons with limited English proficiency), acceptable terminology, fair housing logo use, and appropriate use of photographs and images in advertising.		
Action Step ID	<b>25</b>	<b>Development of a New Single Family Affirmative Fair Housing Marketing Rule</b>	
Begin Date:	6/10/2014 COMPLETED - 12/6/2015	Single Family	<b>H</b>
Summary	A new Single Family Affirmative Marketing Rule was drafted for inclusion in the Single Family Umbrella Rule under 10 TAC 20.9, General Administration and Program Requirements. The new Rule clarifies expectations and monitors compliance with HUD's affirmative marketing requirements. State Housing Trust Fund programs are also subject to the provision to create consistency within the Department. This rule was expanded in 2017.		
Action Step ID	<b>27</b>	<b>Internal Fair Housing Training Initiative</b>	
Begin Date:	6/16/2014 ONGOING	Agency Wide	<b>H</b>
Summary	An internal fair housing training initiative was established to provide more education and training to internal staff. In 2014 the initiative began with poster display and blogging on the water cooler page and culminated in brown bag sessions for internal staff and mini power point presentations at program area staff meetings. As noted in Step #201, the Department subsequently established required bi-annual fair housing training for all agency staff.		
Action Step ID	<b>29</b>	<b>Research and Identification of Translation Services for Limited English Proficiency Clients</b>	
Begin Date:	6/20/2014 COMPLETED - 2/12/2015	Agency Wide	<b>H</b>
Summary	The Fair Housing Team led the efforts to address the need for agency third party translation services. Identification of funding was discussed as well as developing a memorandum of understanding with other state agencies contracting for services (Department of State Health Services (DSHS) and Texas Health and Human Services Commission (HHSC)) for services. DSHS and HHSC were contacted for more information and in preparation of a TDHCA proposal for services. An internal agency survey was conducted through program Division Directors to acquire feedback on prospective use of written and oral translation services. Results of the survey were used to assist the agency in estimating efficacy and cost. Translation services were subsequently procured on a standing as-needed basis, and are used across the agency.		

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Action Step ID	<b>30 Revisions to Compliance Monitoring and Tracking System (CMTS) Demographic Data Collection Fields</b>		
Begin Date:	6/27/2014 COMPLETED - 5/15/2017	Multifamily	<b>H</b>
Summary	The Fair Housing Team and Compliance Division guided CMTS system changes to gather demographic information for each household member rather than on a cumulative household basis. These corrections in the CMTS system assist the Department in being able to better evaluate and streamline demographic reporting, deliver data to the US Department of Housing & Urban Development (HUD) for inclusion in the Housing Finance Agency report, and analyze the demographic composition of its portfolio. The revised screen includes information on household members' race, ethnicity, age, and disability status. The CMTS changes to allow for data entry of demographic information at the household member level were completed on January 2, 2017, and the CMTS feature (CMTS Unit Upload) that processes uploads of this information from property management software products was completed on January 27, 2017. All vendors updated their software products to work with CMTS Unit Upload by early April 2017. Updated household information was supplied by properties in April 2017.		
Action Step ID	<b>32 Revisions to the Compliance Monitoring and Tracking System (CMTS) to Fix and Populate Census Tract Entry</b>		
Begin Date:	7/8/2014 COMPLETED - 8/1/2015	Multifamily	<b>H</b>
Summary	The Fair Housing Team led the initiative to improve and populate the census tract entry field for each property in the Department's portfolio to prepare for the creation of a website mapping tool that will show service delivery areas and demographic populations served. This kind of tool is heavily dependent on a property's address being accurate and the ability to easily pull census data. This tool is currently in use in CMTS.		
Action Step ID	<b>33 Expansion of Undesirable Site and Area Features Rules in the 2015 Multifamily Rules</b>		
Begin Date:	7/15/2014 COMPLETED - 1/1/2015	Multifamily	<b>H</b>
Summary	Elements related to Environmental Justice were researched for inclusion in the 2015 Undesirable Site and Area Features Rules to be incorporated in the Uniform Multifamily Rules in Subchapter B. The rule revisions consider the incorporation of additional undesirable site features such as large refineries and highly volatile pipelines and suggest a basic criteria to be used in determining whether additional staff review of a site is necessary (criteria suggested/considered include poverty rates, crime index ratings, and proximity to facilities that raise environmental justice concerns). The rule change was adopted.		
Action Step ID	<b>34 Increase of Project Access Voucher Allocations</b>		
Begin Date:	1/1/2012 COMPLETED - 1/1/2014	Single Family	<b>H</b>
Summary	Project Access vouchers were increased from 100 in 2012 to 140 in 2014 to maximize the amount of assistance provided to low income households with an individual with a disability. Project Access serves individuals exiting nursing facilities, intensive care facilities, and board and care facilities statewide. The waiting list fluctuates in size and continues to assist persons transitioning out of facilities into community based settings. As of February 2018 there were 145 applicants on the waiting list.		

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Action Step ID	<b>35 Project Access Pilot Program with Texas Health and Human Services Commission (HHSC) and Texas Department of State Health Services (DSHS)</b>		
Begin Date:	6/1/2001 ONGOING	Single Family	<b>H</b>
Summary	In working with local stakeholders and examining the needs of tenants with disabilities across the state, the Section 8 Program Area created the Project Access Pilot, in which 10 of 140 vouchers offered through Project Access are made available in partnership with Texas DSHS and HHSC to specifically assist persons exiting state psychiatric hospitals. All 10 pilot vouchers are in use as of February 2018, with 51 applicants on the waiting list.		
Action Step ID	<b>36 Section 8 Technical Assistance for Relocation Contracts and the HOME TBRA Bridge</b>		
Begin Date:	9/1/2014 ONGOING	Single Family	<b>H</b>
Summary	Staff created a program policy to encourage the use of HOME Tenant Based Rental Assistance (TBRA) as a bridge to the Project Access program to better assist persons with disabilities and facilitate access to vouchers, including allowing TBRA HOME Administrators to amend their program designs to prioritize individuals residing in institutions and on the Project Access waitlist where a Project Access voucher was not yet available. This change occurred through an amendment to 10 TAC § 5.801. Technical Assistance for Relocation Contractors was also provided so TBRA Administrators could assist in identifying opportunities for transitioning eligible HOME TBRA participants to the Project Access program (which unlike TBRA does not have a time limit on assistance). This program continues and its use fluctuates as the Project Access waiting list fluctuates.		
Action Step ID	<b>37 TDHCA Sets Aside 5% of HOME funds for Use in Programs Serving Persons with Disabilities (PWD)</b>		
Begin Date:	6/1/2001 ONGOING	Multifamily	<b>H</b>
Summary	Since 2001, the state has set-aside a portion of the annual HOME allocation for use by persons with disabilities, per Texas Government Code 2306.111(c). TDHCA currently reserves 5% for use in PWD activities to encourage better service provision to households with an individual who has a disability across the state and in Participating Jurisdictions. The state also tracks households that voluntarily report that at least one member of their household includes a person with a disability, and that accounts for 15% to 20% of total households served in the HOME program.		
Action Step ID	<b>38 Use of Small Area Fair Market Rent Standards as the Rent Limit Basis to Encourage Voucher Use in High Opportunity Areas</b>		
Begin Date:	1/1/2010 COMPLETED - 9/6/2016	Single Family	<b>H</b>
Summary	After a review of household and affordability data and based on feedback from program participants, the Section 8 program determined that in some cases the fair housing choice of assisted households is limited by voucher payment standards; TDHCA began using the small area FMR standards (higher standards for certain high opportunity census tracts) to enable household use with maximum choice and limited barriers. The plan was formally adopted at the November 6, 2016 board meeting.		

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Action Step ID	<b>39 Provision of Fair Housing and Educational Materials for Section 8 Recipients</b>		
Begin Date:	7/1/2016 ONGOING	Single Family	<b>H</b>
Summary	TDHCA serves as a small Public Housing Authority (PHA). As committed in its PHA Administrative Plan the Section 8 Division provides Fair Housing guidance to both prospective tenants and property Owners/landlords in the form of Fair Housing information packets and briefings to tenant and new landlords. In addition to fair housing information, the briefing packet was recently updated to include information and maps on proximity to hospitals, schools, and other amenities by location/area. The packet is periodically reviewed and updated (see also step #212).		
Action Step ID	<b>41 Section 8 Program Security Deposit Limit</b>		
Begin Date:	6/1/2012 ONGOING	Single Family	<b>H</b>
Summary	TDHCA requires Owners participating in the Section 8 Program to limit security deposits to no more than one month's rent. Households are responsible for paying the security deposit. This policy increases unit affordability for low income families.		
Action Step ID	<b>42 Section 8 Streamlining of Criminal Screening Standards</b>		
Begin Date:	1/1/2012 COMPLETED - 1/1/2012	Single Family	<b>H</b>
Summary	Prior to 2012, TDHCA's local subrecipients were allowed to separately perform criminal screening of Section 8 participants. However, in an effort to ensure that screened and accepted Section 8 households were not subject to additional or higher standards at the Local Operator level, and that all are treated equitably, this was subsequently discontinued and only TDHCA conducts the screening for the applicant household.		
Action Step ID	<b>44 Revision of the Single Family Umbrella Rule to Allow Housing Trust Fund Amy Young Barrier Removal Funds to be used for Manufactured Housing Modifications</b>		
Begin Date:	4/1/2014 COMPLETED - 11/1/2014	Single Family	
Summary	The revision of the Single Family Umbrella Rule for the 2014 Rules Cycle included revised language concerning the use of Federal funds in manufactured housing modifications. The Rule was specifically modified to allow the use of State funded Housing Trust Fund in the Amy Young Barrier Removal Program to be used to modify existing manufactured homes where accessibility features are required to meet the needs of individuals with disabilities. Feedback on this Rule was generated through TDHCA's work with the Housing and Health Services Coordination Council and the Disability Advocacy Workgroup.		

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Action Step ID	<b>47 Creation of a Brochure Regarding Tenant's Programmatic Rights</b>		
Begin Date:	8/8/2014 COMPLETED - 1/1/2015	Multifamily	<b>H</b>
Summary	A tenant rights and resources brochure was created by the Fair Housing and Compliance team with the intent of: 1) increasing education about fair housing rights and reasonable accommodations, 2) increasing education about the rights of Section 8 renters in TDHCA funded multifamily rental properties, 3) creating a more meaningful fair housing disclosure notice, and 4) ensuring properties are adequately advertising their available amenities and services. Brochures are posted in multifamily properties and given to tenants at move in. The Uniform Multifamily Rules require that a Fair Housing Disclosure Notice form be presented to the household at the time of application for occupancy. The form provides the household with notification of their rights to choose among available housing options. The brochure is available in English and Spanish. In July 2016 the brochure was translated upon request into Chinese and Filipino (see also step #222).		
Action Step ID	<b>48 Expansion of Universal Design Elements to Single Family Homeowner Rehabilitation Assistance (HRA) Minimum Construction Standards</b>		
Begin Date:	9/4/2014 COMPLETED - 11/1/2014	Single Family	<b>H</b>
Summary	The Department implemented the Texas Minimum Construction Standards (TMCS) to be effective in January of 2015 to remedy health and safety defects, particularly life threatening deficiencies in all single family programs. TMCS also supports universal design concepts such as accessible doorway considerations when the home is rehabilitated with federal funds. TMCS outlines the minimal level of work required and methods and materials for rehabilitation projects. These programs increase the stock of housing that is available for persons with disabilities.		
Action Step ID	<b>51 Rule Provisions and Statute Require All Multifamily Properties to be Subject to Section 504 as Specified Under 24 CFR Part 8, Subpart C</b>		
Begin Date:	8/1/2012 COMPLETED - 1/4/2013	Multifamily	<b>H</b>
Summary	The State of Texas regulations and TDHCA Rules require all Multifamily TDHCA monitored rental properties to follow Section 504 requirements. Rule provisions are included in statute, the Uniform Multifamily Rules, Chapter 10, Subchapter B, Section 10.101(a)(8), and are reiterated in additional program area rules, notices of funding availability, and in the Compliance Monitoring Rules in Subchapter F. (Cites were those cites at the time this action was taken.)		
Action Step ID	<b>53 Expansion of Affirmative Marketing requirements to National Housing Trust Fund (NHTF), Mortgage Revenue Bond (MRB), and Housing Tax Credit (HTC) properties</b>		
Begin Date:	9/4/2014 COMPLETED - 12/18/2014	Multifamily	
Summary	Affirmative Marketing requirements were extended to the HTC and the NHTF programs through the Uniform Multifamily Rules in Subchapter F to ensure state goals of affirmatively furthering fair housing across its affordable housing portfolio. As a result of including these additional programs, all multifamily TDHCA monitored properties are required to affirmatively market.		



## TDHCA Fair Housing Action Steps by Impediment

Action Step ID	<b>54 Qualified Allocation Plan and Statute Housing De-Concentration Factors</b>
Begin Date:	3/12/2009 COMPLETED - 1/4/2013 Multifamily
Summary	In an effort to ensure that affordable, low income properties monitored by TDHCA are not clustered in concentrated areas that will create a lack of fair housing choice, TDHCA provided four deconcentration factors for threshold selection. These are listed in Section 11.3 of the QAP and include the Two Mile Same Year Rule (Texas Gov't Code §2306.6711(f)), the Twice the State Average Per Capita Rule (Texas Gov't Code, §2306.6703(a)(4)), the One Mile Three Year Rule (Texas Gov't Code §2306.6703(a)(3)), and Limitations on Developments in Certain Census Tracts Rule.
Action Step ID	<b>55 2014 Qualified Allocation Plan Limitation on Qualified Non-Rural Elderly Developments</b>
Begin Date:	3/12/2015 COMPLETED - 9/1/2015 Multifamily
Summary	The 2014 QAP provided a limitation on qualified non-rural elderly developments in the counties of Collin, Denton, Ellis, Johnson, Hays, and Guadalupe as well as non-rural developments in Regions 5, 6, and 8. This limitation was created to balance TDHCA's portfolio, which showed a percentage of qualified elderly households exceeding percentages of the total qualified elderly eligible populations for the area. As result, developers were incentivized to pursue general family developments in these areas and increase housing stock for non-elderly families.
Action Step ID	<b>57 2014 Qualified Allocation Plan Tie Breaker Factor Based on High Opportunity Area Provisions</b>
Begin Date:	7/1/2013 COMPLETED - 1/1/2014 Multifamily
Summary	The 2014 Qualified Allocation Plan (QAP) included applications scoring higher on the Opportunity Index as its first tie breaker factor in the event that Competitive Housing Tax Credit (HTC) applications should tie with another application with the same score at the time of HTC award. This further served to incentivize development in High Opportunity areas as specified in the 2014 QAP under Chapter 11.
Action Step ID	<b>58 Qualified Allocation Plan (QAP) Criteria to Serve and Support Texans Most in Need</b>
Begin Date:	11/15/2001 ONGOING Multifamily
Summary	Criteria included in the QAP to ensure that Texans most in need are supported and served by the Housing Tax Credit program include point elections to incentivize development of additional units to serve 30% area median income (AMI) (extremely low income) tenants and development of supportive housing developments proposed by a qualified nonprofit. The criteria awards additional points in the event that 20% of units will be made available to tenants at 30% AMI for supportive housing or at least 10% of all units in urban or 7.5% of all units in rural will be made available to tenants at 30% AMI (captured under 11.9(C)(2) in the 2017 QAP and in Texas Gov't Code §2306.6710(b)(1)(E)). This is on-going in the 2018 QAP.

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Action Step ID	<b>59 Qualified Allocation Plan Criteria for Tenant Populations with Special Housing Needs</b>		
Begin Date:	9/1/1993 ONGOING	Multifamily	
Summary	While not new, one way that TDHCA promotes affirmatively furthering fair housing is the inclusion of criteria in the QAP for Tenant Populations with Special Housing Needs. Applicants can elect points for developments which commit that at least 5% of units will be set aside for persons with special needs (such as individuals with alcohol and drug addictions, Colonia residents, persons with disabilities, persons protected by the Violence Against Women Act (VAWA), persons with HIV/AIDS, homeless populations, veterans, wounded warriors, and migrant farm workers). Such units must be affirmatively marketed to persons with special needs and units must be held vacant for occupancy by a person meeting special needs criteria for a 12 month period at the time of lease up (Section 42(m)(1)(C)(v)). State Statute 2306.513, effective September 1, 1993, gave the Department’s board the ability to adopt rules to achieve occupancy by individuals with special needs in multifamily housing developments. The special needs criteria first appeared in the 1994 QAP, and subsequent QAPs have included this special needs		
Action Step ID	<b>64 Uniform Multifamily Rules and Statute Provision for Tenant Selection Criteria</b>		
Begin Date:	6/1/2013 COMPLETED - 11/22/2013	Multifamily	<b>H</b>
Summary	The Uniform Multifamily rules provision requires the creation and use of Written Policies and Procedures in 10 TAC § 10.610 that prohibit refusal to rent to Section 8 tenants or tenants of other federal subsidy programs, create a minimum income standard for voucher holders to decrease impediments to low income access, and prohibit owners from denying prospective tenants on the basis of provision protected under the Violence Against Women Reauthorization Act of 2013. The rule was first adopted on November 22, 2013.		
Action Step ID	<b>66 Uniform Multifamily Rule Provision Related to Notice of Amenities and Services</b>		
Begin Date:	9/14/2014 COMPLETED - 12/11/2014	Multifamily	<b>H</b>
Summary	The Uniform Multifamily rule provision included in 10 TAC § 10.613, Leasing Provisions, requires that the development owner provide each household at the time of execution of an initial lease a notice describing fair housing and tenant choice and common amenities, unit amenities, or required services. The provision assists the Department in expanding choice to low income and households with an individual with a disability who might desire particular amenities or services. The rule was amended on January 2, 2015.		
Action Step ID	<b>67 Bond, 4% Housing Tax Credit Rules Tie Breaker Factor Based on Housing De-Concentration Factors</b>		
Begin Date:	12/12/2013 COMPLETED - 12/12/2013	Multifamily	<b>H</b>
Summary	The Multifamily Housing Revenue Bond Rules in Section 12.4 (c) Scoring and Ranking, include tie breaker factors for 4% Housing Tax Credit (HTC) and Mortgage Revenue Bond deals in the following order: 1) Applications that meet any of the criteria under serving and supporting Texans most in need (related to offering more units at a lower area median income range to create more affordable housing options for low income families, offering tenant services or supportive housing or housing to tenants with		

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special housing needs, or qualifying under the opportunity index, or 2) Applications that are the greatest linear distance from the nearest HTC assisted development (in the interest of ensuring maximum fair housing choice).

Action Step ID	<b>68 Texas Interagency Council for the Homeless (TICH)</b>		
Begin Date:	9/1/1995 ONGOING	Agency Wide	<b>H</b>
Summary	In 1995, the 74th Texas legislature established the TICH under Tex. Gov't Code, §§2306.901 – 2306.910. Legislation requires TICH to coordinate the state's resources and services to address homelessness. TICH serves as an advisory committee to the Department, which provides staff to assist in Council work. Representatives from eleven state agencies sit on the council along with members appointed by the Governor, Lieutenant Governor, and Speaker of the House of Representatives. Demographically, those experiencing homelessness are more likely to have a disability; more than 40 percent of America's homeless population are persons with disabilities.		
Action Step ID	<b>69 Qualified Allocation Plan (QAP) At Risk Set Aside provisions</b>		
Begin Date:	11/15/2002 COMPLETED - 1/1/2014	Multifamily	
Summary	The QAP includes At Risk Set Aside criteria that allowed relocation of existing units qualifying as at risk if the affordable restrictions and subsidies were approved for transfer to a new site prior to the tax credit commitment deadline, the same number of restricted units was proposed, and the new development site would qualify for points under the Opportunity Index. This new provision assisted TDHCA in guiding new policies concerning demolition and replacement of at risk units in areas better suited to fair housing choice and opportunity than their original locations while also seeking to preserve affordable housing units. Subsequent QAPs have continued this criteria.		
Action Step ID	<b>70 Provision of Awards Based on the Texas State Regional Allocation Formula (RAF)</b>		
Begin Date:	7/1/2000 COMPLETED - 7/1/2000	Agency Wide	<b>H</b>
Summary	The RAF was developed in compliance with Texas Gov't Code §2306.1115 (effective September 1, 2017) to award available funds within rural and urban sub-regions and to ensure equitable and consistent provision of credits, HOME, multifamily direct loan, and Housing Trust Fund (HTF) funds based on statistical data that measures affordable housing needs and resources in 13 State Service Regions. The RAF is revised annually to reflect changes in data, public comment, and assess available resources. The RAF has been in place since 2000.		
Action Step ID	<b>72 Qualified Allocation Plan (QAP) Community Revitalization Provisions</b>		
Begin Date:	11/15/1999 COMPLETED - 1/1/2013	Multifamily	
Summary	The QAP includes Community Revitalization Plan provisions in Section 11.9(d)(7) that serve as an incentive for communities outside of the Opportunity Index to invest in community revitalization to address adverse environmental conditions, presence of blight, inadequate transportation and infrastructure, lack of accessibility and/or inadequate public facilities, presence of significant crime, lack of poor condition and/or performance of public education, lack of local business providing employment		

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opportunities, or lack of planning efforts to promote diversity. As a result of this investment, communities with concerted revitalization efforts that include affordable housing development can still enter competitive applications for consideration.

Action Step ID **79 Neighborhood Stabilization Program 3 (NSP) Application Point Incentives Encouraging High Opportunity Area Investments**

Begin Date: 3/14/2011 COMPLETED - 4/15/2011 Multifamily **H**

Summary In the release of NSP3 funds, application point incentives were created to encourage: 1) Housing for households at or below 50% AMI (5 pts), 2) Development in low poverty areas (census tracts with no greater than 10% poverty thresholds according to the census) (1 pt), 3) Development in mixed-use residential/community areas located within a 1/4 mile radius of existing or proposed bus stops (1 pt), 4) Development in attendance zones of exemplary or recognized elementary schools (1 pt), and 5) Development of units designed to serve special needs or hard to serve populations (2 pts were possible if 51% of units were

Action Step ID **81 Single Family Options for Households with Limited or No Credit and Limited Funds for Initial Investment**

Begin Date: 4/27/2017 COMPLETED - 8/24/2017 Single Family **H**

Summary Single family rules adoption allowed for alternative means of demonstrating credit in the event that a single family household had limited or no credit available at application. Alternative means of demonstration included references from rental housing, utility companies, and landline phones. This flexibility is intended to remove barriers to program access for low income persons and persons with disabilities (10 TAC § 20.13(c)(2)(E)).

Action Step ID **82 Neighborhood Stabilization Program (NSP) Pairing of Homebuyer Assistance with Zero Interest Loans for 50% Area Median Income (AMI) Families**

Begin Date: 3/3/2009 COMPLETED - 4/27/2009 Single Family **H**

Summary The NSP program allowed subrecipients to apply to acquire foreclosed, abandoned, or vacant properties with permanent loans with deferred, forgivable terms. The NSP1 notice of funding availability required that subrecipients use at least 35% of their non-admin funds to serve households at or below 50% AMI and NSP3 awarded points to incentivize applications seeking to serve households at or below 50% AMI. Households at or below 50% AMI were eligible for 0% interest mortgages plus deferred forgivable homebuyer assistance.

Action Step ID **83 Emergency Solutions Grants (ESG) Request for HUD Waiver to Exceed Fair Market Rents (FMR)**

Begin Date: 10/13/2014 COMPLETED - 10/13/2014 Single Family **H**

Summary TDHCA requested a waiver from HUD on October 13, 2014, under 24 CFR Section 576.106(d) of the ESG Interim Rule for permission to exceed the HUD FMR for ESG rapid re-housing and homelessness prevention programs and expand tenant fair housing choice to high opportunity neighborhoods in higher cost rental markets that have recently experienced rent increases due to rapid economic and population growth. As part of this waiver, the Department requested approval to: 1) Assist participants with rents at 110% of the HUD published FMR in all Texas areas except Dallas-Fort Worth-Arlington and Laredo MSAs, 2) Assist participants in Dallas-Fort Worth-Arlington and Laredo metropolitan statistical areas (MSAs) with rents up to

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HUD's Small Market FMRs, and 3) Assist participants with disabilities who require reasonable accommodations to rent units up to 120% of the HUD published FMR. HUD guidance indicated that this request was too broad. Staff revised and resubmitted, see

Action Step ID	<b>84</b>	<b>Emergency Solutions Grants (ESG) Adoption of Outcome Analysis and Continuum of Care (CoC) Award Models</b>		
Begin Date:	6/26/2014	COMPLETED - 9/30/2016	Single Family	<b>H</b>
Summary	ESG, as part of a Federal program design, moved funding awards to Continuum of Care recipients rather than individual providers. This was accomplished in Tarrant County in which ESG funding was awarded to the Tarrant County Homeless Coalition, the lead agency for the Continuum of Care. Tarrant County Homeless Coalition then awarded local providers and managed the contracts with the sub-subrecipients. The result will be awards moving through local jurisdictions rather than individual providers and should achieve a better mechanism for data capture, needs assessment, and determining efficiency and accountability. This model was conducted in 2014 and 2015, but discontinued in 2016 due to unsustainability for			
Action Step ID	<b>85</b>	<b>Emergency Solutions Grant (ESG) Spanish Language Contract Requirements</b>		
Begin Date:	9/1/2014	COMPLETED - 5/3/2016	Single Family	<b>H</b>
Summary	The contract between the Department and its ESG subrecipients requires that subrecipients provide program applications, forms, and educational materials in both English and Spanish and other languages as appropriate for the service area. ESG staff provided additional guidance for Limited English Proficiency (LEP) provisions through a webinar and sample Language Access Plan (LAP). The forms used by program participants have been translated into Spanish and are posted online. Those forms include the Income Screening Tool, Income Certification, Request for Unit Approval, and Rental Assistance Agreement. A Language Access Plan is required of all subrecipients starting with fiscal year 2016 awards. Spanish is a mandatory language for all LAPs. This was a requirement for 2016 ESG Subrecipients during the ESG application process.			
Action Step ID	<b>87</b>	<b>Single Family HOME Homeowner Rehabilitation Assistance (HRA) Allowance of Additional Funds for Accessible Features</b>		
Begin Date:	5/7/2015	COMPLETED - 7/30/2015	Single Family	<b>H</b>
Summary	The HRA section of the single family HOME Rules allows for up to \$5,000 in direct costs in excess of the program maximum to be requested for homeowners requesting accessible features. This rule appeared in 10 Texas Administrative Code § 23.31(e)(3).			
Action Step ID	<b>90</b>	<b>Single Family HOME Tenant Based Rental Assistance (TBRA) Extended Terms for Tenants Applying for Vouchers or Other Subsidized Housing Programs</b>		
Begin Date:	12/12/2013	COMPLETED - 12/12/2013	Single Family	<b>H</b>
Summary	Under the single family HOME TBRA rules 10 TAC § 23.61, total lifetime assistance is limited to 36 months except in cases where the tenant has applied for a Section 8 Housing Choice Voucher, HUD Section 811 Supportive Housing for Persons with Disabilities, HUD Section 811 Project Rental Assistance Demonstration, or HUD Section 202 Supportive Housing for the Elderly Program, and is placed on a waiting list during their TBRA participation tenure, in which case lifetime assistance can go up to 60 months. This extension for TBRA assistance allows subrecipients to guide participants towards permanent housing options that			

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will best meet their household's needs and helps to avoid unnecessary gaps in housing assistance for low income families and

Action Step ID	<b>91 Single Family HOME Application Changes</b>		
Begin Date:	7/1/2014 COMPLETED - 9/2/2016	Single Family	<b>H</b>
Summary	The 2016 HOME single family notice of funding availability and application incentivized submission of a Language Access Plan with the application to reinforce Limited English proficiency requirements as finalized under the revised single family umbrella		
Action Step ID	<b>92 Single Family Accessibility Requirements and Incorporation in Program Area Rules</b>		
Begin Date:	6/1/2011 COMPLETED - 8/14/2015	Single Family	<b>H</b>
Summary	To ensure compliance with single family accessibility requirements, changes in program rules were implemented to receive verification of accessibility requirements based on architect certification on building plans and written verification of accessibility of the unit at final inspection. Stronger compliance and enforcement will assist the state in ensuring new single family units are constructed in compliance with the single family accessibility standards mandated by TDHCA and statute.		
Action Step ID	<b>93 Section 811 Project Rental Assistance Program (PRA) Grant and Implementation, Providing Tenant Choice and Assisting Persons with Disabilities</b>		
Begin Date:	9/19/2011 Completed Date Unavailable	Single Family	<b>H</b>
Summary	The Department, in partnership with the Texas Health and Human Services Commission (HHSC), successfully applied under HUD's Section 811 PRA Demonstration program to receive a grant to assist the Department in offering additional housing options for persons with disabilities through project-based rental assistance utilized in its multifamily programs properties. The program is targeted towards people with disabilities living in institutions, people with serious mental illness, and young adults with disabilities existing foster care. To maximize tenant choice, while still ensuring the units are fully-integrated into the community, the Department is recruiting properties to participate by creating incentives for multifamily developers that are participating in TDHCA's Multifamily Housing Programs and qualified properties outside the TDHCA portfolio. TDHCA was awarded \$24,342,000 to administer the program.		
Action Step ID	<b>95 Housing Trust Fund (HTF) Bootstrap Rule Provision Considerations of Credit Eligibility Factors Impacting Low Income Households</b>		
Begin Date:	7/30/2015 COMPLETED - 10/15/2015	Single Family	
Summary	The TDHCA HTF Bootstrap Rule provisions in Section 24.9 expand credit eligibility to include households engaged in remediation such as payment plans that are intended to assist the household in re-establishing credit. The provisions allow for alternative underwriting criteria.		
Action Step ID	<b>96 Housing Trust Fund (HTF) Bootstrap Rule Provision Allows for Alternative Means of Providing Self Help Labor</b>		
Begin Date:	9/1/2001 ONGOING	Single Family	
Summary	In 2001, the Texas Gov't Code Section 2306.753(4)(D) and TDHCA's HTF Bootstrap Rule provisions in Section 24.10 were amended to provide persons with disabilities an alternative means of providing self help labor to qualify under owner-builder		

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requirements. This flexible provision extends this self-help lending program to persons with disabilities.

Action Step ID	<b>97 Housing Trust Fund (HTF) Bootstrap Rule Requirement for Owner-Builder Homeownership Education Classes</b>
Begin Date:	1/1/1999 ONGOING <span style="float: right;">Single Family</span>
Summary	In 1999, Texas Gov't Code Section 2306.756 was created to require Owner-Builders to complete homeownership classes prior to receiving assistance through the Bootstrap Program. These classes are offered in Spanish and English and include content to assist unbanked residents to understand and build credit.
Action Step ID	<b>98 Housing Trust Fund (HTF) Amy Young Barrier Removal Program Marketing in Spanish and English</b>
Begin Date:	9/1/2011 ONGOING <span style="float: right;">Single Family</span>
Summary	The HTF Amy Young Barrier Removal Program markets the program in both Spanish and English to better reach persons with disabilities in underserved areas of the state and reduce barriers created by Limited English Proficiency.
Action Step ID	<b>99 Housing Trust Fund (HTF), Operation of the Amy Young Barrier Removal Program</b>
Begin Date:	1/1/2010 ONGOING <span style="float: right;">Single Family</span>
Summary	Beginning in 2010, TDHCA established the Amy Young Barrier Removal Program to specifically serve persons with disabilities seeking to modify their homes to meet their accessibility needs. Nonprofit and local governments process intake applications, determine eligibility, and oversee construction for eligible households across the state. Assistance is in the form of construction grants of up to \$20,000 for both renters and homeowners under 80% area median family income.
Action Step ID	<b>100 Housing Trust Fund (HTF) Establishment of Funds for Contract for Deed (CFD)</b>
Begin Date:	6/19/2015 COMPLETED - 9/1/2015 <span style="float: right;">Single Family</span>
Summary	House Bill 311 from the 84th Texas Legislature greatly simplifies the title conversion process through which a borrower converts their Contract for Deed (or "executory contract") into a deed to declare ownership. The borrower simply files the CFD in the Real Properties Records in the county where the property is located. However, many borrowers are unaware of the passage of House Bill 311 and it is estimated that more than 6,000 unrecorded CFDs still remain in the colonias, leaving borrowers vulnerable. In addition to HOME CFD activities, the Housing Trust Fund Contract for Deed Program supports nonprofits and units of local government to identify households with unrecorded CFDs and address clouded titles in the colonias.
Action Step ID	<b>101 Texas State Community Development Block Grant (CDBG) Grant Allocation to TDHCA for Use in Colonia Self-Help Centers</b>
Begin Date:	1/1/1995 ONGOING <span style="float: right;">Single Family <b>H</b></span>
Summary	The Legislature provided for use of Texas State CDBG grant allocations for the express purpose of providing housing assistance to colonia residents through the Colonia Self-Help Centers in 1995. There are seven Colonia Self-Help Centers along the Texas-Mexico border region in the following counties: El Paso, Maverick, Val Verde, Webb, Starr, Hidalgo, and Cameron/Willacy. The Colonia Self-Help Centers provide a range of assistance to Colonia residents and reduces barriers for Colonia residents seeking to apply for funds under various housing programs and other TDHCA low income and disability programs. Materials provided at

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the Colonia Self-Help Centers are provided in English and Spanish.

Action Step ID	<b>102 Colonia Rule Provision Allowing for Grant and Loan Use for Suitable Housing Outside of a Colonia</b>		
Begin Date:	6/17/1995 ONGOING	Single Family	<b>H</b>
Summary	Colonia Self-Help Center rule provisions in Section 25.3(9) and Texas Gov't Code Section 2306.586 allow for the use of Colonia grant and loan funds for suitable housing both outside and within colonias as a way to improve housing stock in existing colonias and reduce overcrowding situations. This flexibility is intended to protect fair housing choice and allow households to relocate to areas that may offer more opportunity and infrastructure.		
Action Step ID	<b>103 Colonia Rule Provision Allowing Funds for Credit and Debt Counseling</b>		
Begin Date:	11/1/2012 ONGOING	Single Family	<b>H</b>
Summary	TDHCA's Colonia Self-Help Center rule provision 10 TAC § 25.3(7) (Texas Gov't Code Section 2306.586) allows the use of Community Development Block Grant funds for providing credit and debt counseling related to home purchase and finance. This provision assists unbanked residents in building credit and provides consumers information to better access homeownership and other assistance programs. Colonia Self-Help Centers play an integral role in providing information and education to persons with Limited English Proficiency along the Texas-Mexico border.		
Action Step ID	<b>104 Colonia Rule Provision Allowing Funds for Provision of Assistance to Access Loans or Grants</b>		
Begin Date:	11/1/2012 ONGOING	Single Family	<b>H</b>
Summary	Colonia Self-Help Center rule provision 10 TAC § 25.3(11) allows Community Development Block Grants funds to be used by Colonia Self-Help Centers to provide assistance to households eligible for loan or grant programs. This provision facilitates the Department in reaching colonia residents that are "least likely to apply" populations along the Texas-Mexico border in the seven designated Colonia Self-Help Center areas and decrease barriers due to Limited English Proficiency.		
Action Step ID	<b>105 Creation of Colonia Resident Advisory Committee</b>		
Begin Date:	11/1/2012 ONGOING	Single Family	<b>H</b>
Summary	Colonia Self-Help Center Rule 10 TAC §25.6(a) requires the appointment of residents of a Colonia to serve on a Colonia Resident Advisory Committee (C-RAC) within the targeted Colonias in which a Colonia Self-Help Center is located. The C-RAC advises TDHCA's Board on the Colonia's housing needs, the effectiveness of its proposed programs, and the award of contracts. Nonprofits recommend appointments to the County and the County submits nominations to the TDHCA Board, which appoints the C-RAC. In this way, the State of Texas and TDHCA obtain public participation and ensure that Colonia resident feedback is considered when improving housing opportunities for protected classes and low income populations in the Colonias.		
Action Step ID	<b>106 Colonia Self-Help Center Client Access to Activities</b>		
Begin Date:	11/1/2012 ONGOING	Single Family	<b>H</b>
Summary	The Colonia Self-Help Center Program rule in 10 TAC § 25.7 (j) requires that Colonia Self-Help Center administrators allow access		



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to all activities identified in their contracts on at least one Saturday a month and at least one day during the work week after normal working hours to limit barriers to access for Colonia residents and families.

Action Step ID	<b>107 Provision of Three Border Field Offices</b>		
Begin Date:	6/15/1993 ONGOING	Agency Wide	<b>H</b>
Summary	TDHCA supports the administration of three Border Field Offices funded by General Revenue, Appropriated Receipts, and Community Development Block Grant funds. These offices provide technical assistance to Colonia residents, nonprofits, for-profits, units of local government, and other community organizations along the Texas-Mexico border. The Border Field Offices help with applications, procurement, specification writing, and other items as needed. Like the Colonia Self- Help Centers, the Border Field Offices offer additional support and language services to residents in underserved areas within the		
Action Step ID	<b>110 TDHCA Attendance at the Congress for the New Urbanism Central Texas Chapter Luncheon "Great Places and Healthy People"</b>		
Begin Date:	10/22/2014 COMPLETED - 10/29/2014	Agency Wide	<b>H</b>
Summary	TDHCA attended the Congress for New Urbanism luncheon on "Great Places and Healthy People" that hosted keynote speaker Dr. Richard Jackson, Pediatrician and Public Health Leader. The lecture examined the connection between poor community design and burgeoning health issues, such as obesity, diabetes, heart, asthma, cancer and depression. These issues are highlighted in the 4-part Public Broadcasting Service series "Designing Healthy Communities."		
Action Step ID	<b>112 TDHCA Attendance at the Opportunity Forum presented by the University of Texas School of Law: Fair Chance Hiring - Reducing Criminal Record Barriers to Employment</b>		
Begin Date:	10/22/2014 COMPLETED - 11/14/2014	Agency Wide	<b>H</b>
Summary	TDHCA attended the Opportunity Forum on Fair Chance Hiring and Criminal Record Barriers to Employment in an effort to gain more insight on what others are identifying and doing in response to criminal record barriers which is a common housing challenge. The presentation was directed by Maurice Emsellem, Program Director at the National Employment Law Project, and David Kirk, sociology professor at The University of Texas at Austin, and included discussions on the significant role criminal records play in creating barriers to employment. The opening presentations were followed by a panel discussion with local experts to consider the implications for Texas and strategies being used at state and local levels.		
Action Step ID	<b>113 Attendance on HUD's State of Fair Housing in America Call</b>		
Begin Date:	11/17/2014 COMPLETED - 11/17/2014	Agency Wide	<b>H</b>
Summary	Reviewed HUD's Annual Fair Housing Report and attended HUD's State of Fair Housing in America conference call addressing its current activities, landmark cases, and upcoming goals.		
Action Step ID	<b>124 Develop Checklist and Example Language Access Plan (LAP) for ESG Subrecipients</b>		
Begin Date:	1/1/2016 COMPLETED - 3/1/2016	Single Family	<b>H</b>
Summary	The language access plan checklist for Emergency Solutions Grant subrecipients was created. It outlines sections needed to		

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further comply with HUD guidance on Limited English Proficient (LEP) populations. The checklist helps subrecipients comply with the guidance on how to provide necessary language access, including prioritizing types of assistance and interactions with LEP persons. Language access plans assist with fair housing barriers based on national origin.

Action Step ID **125 Research development of Qualified Allocation Plan (QAP) Scoring Incentives for Development in High Opportunity Areas consistent with Fair Housing objectives**

Begin Date: 12/1/2015 COMPLETED - 11/10/2016 Agency Wide **H**

Summary Participate in monthly Qualified Allocation Plan 2017 roundtable discussions. Staff researched potential scoring items, changes in Texas Education Agency (TEA) educational standards, regional scores, updated poverty and income Census data, and mapped data to determine eligible tracks and potential patterns.

Action Step ID **128 Analyze Homeless Housing and Services Program (HHSP) Design, Consider Expanding Program Eligibility**

Begin Date: 1/8/2016 COMPLETED - 6/30/2016 Single Family **H**

Summary Researched possible impact on protected classes in expanding program income eligibility from extremely low income to very low income (based on area median income). The program provides funding to the eight largest cities in Texas and can fund a range of activities including construction, development, or procurement of housing for homeless persons; rehabilitation of structures targeted to serving homeless persons or persons at-risk of homelessness; provision of direct services and case management to homeless persons or persons at-risk of homelessness; or other homelessness-related activity as approved by the Department. After input from the 8 HHSP grantees, TDHCA's rules were changed to increase the income level from below 30% to up to 50% Area Median Income for re-certifications within 12 months after initial intake for homelessness prevention or

Action Step ID **131 TDHCA Attendance at Austin Fair Housing Conference**

Begin Date: 2/19/2016 COMPLETED - 4/20/2016 Agency Wide **H**

Summary TDHCA staff from the HOME, Multi-Family, and Fair Housing divisions attended the 2016 Fair Housing Conference on April 20, 2016, hosted by the City of Austin and Texas Workforce Commission. TDHCA's Executive Director, Tim Irvine, presented on a panel discussion on the new Affirmatively Furthering Fair Housing rule from the US Department of Housing & Urban Development. The conference covered disparate impact, analysis of impediments to fair housing choice, fair housing testing,

Action Step ID **133 Analyze and Modify Section 8 Fair Market Rents**

Begin Date: 11/3/2015 COMPLETED - 12/17/2015 Single Family **H**

Summary Staff examined small area fair market rents (FMRs) and hypothetical small area fair market rents to determine if FMRs in the Department's Section 8 service area needed to increase to expand tenant housing choice. The establishment of the standard is important because it essentially determines whether a household will be able to find a unit they can afford with the voucher the Department issues. In areas where market rents are high and there is high demand for rental units it can be challenging for a voucher holder to find a unit. Increased FMRs aid in areas where voucher holders have difficulty in finding acceptable units or

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affording units in more desirable areas. Higher FMRs provide additional choices and opportunities to tenants in highly competitive rental markets. On November 12, 2015, the Board authorized 2016 Payment Standards. Payment standards were revised at the December 17, 2015 board meeting to include the areas previously administered by Alamo Area Council of Governments. The payment standards became effective on January 1, 2016 (see also step #38).

Action Step ID	<b>136 Development of Robust Internal Site and Neighborhood Review Process</b>		
Begin Date:	11/2/2015 COMPLETED - 3/1/2016	Multifamily	<b>H</b>
Summary	Department staff built a database to assist in analyzing site and neighborhood standard for HOME multifamily new construction properties. The Department is responsible for making the determination that proposed sites for new construction meet the federal requirements in 24 CFR 983.57(e)(2) and (3). TDHCA staff developed an internal checklist and a new process requiring a two-person peer review. Applications in areas of minority concentration will receive additional review from the Fair Housing Team as staff complete the checklist and analyze comparable opportunities.		
Action Step ID	<b>137 Conduct Single Family (SF) Affirmative Marketing Training</b>		
Begin Date:	1/7/2016 COMPLETED - 12/31/2017	Single Family	<b>H</b>
Summary	In December 2015, TDHCA's board approved the new single family affirmative marketing rule requiring an Affirmative Marketing Plan--HUD Form 935.2B or equivalent plan. Staff is developing a training to assist SF administrators in complying with the rule to affirmatively market and promote choice and opportunity for those considered "least likely" to know about or apply for housing based on an evaluation of market area data, and submission of the plan will be required prior to execution of any new administrator contracts. Staff will begin with a webinar training directed towards HOME single family subrecipients in 2017.		
Action Step ID	<b>139 Translate HOME Single Family Application Materials into Spanish</b>		
Begin Date:	1/1/2016 COMPLETED - 8/5/2016	Single Family	<b>H</b>
Summary	Staff translated HOME single family client application materials into the Spanish language, posted them to the website, and sent out a notification to administrators via the listserv on August 5, 2016. This includes applications for Homebuyer Assistance, Single Family Development, Tenant Based Rental Assistance, Contract for Deed, and Homeowner Rehabilitation Assistance, and other vital documents. Application materials can be made available in other languages, as needed and requested.		
Action Step ID	<b>140 Creation of Accessible Electronic and Information Resources</b>		
Begin Date:	1/1/2010 ONGOING	Agency Wide	<b>H</b>
Summary	TDHCA's Information Systems Division assists the agency in the creation and procurement of electronic and information resources that are accessible for persons with disabilities. TDHCA's Website Administrator serves as EIR Accessibility Coordinator, and in this role leads the agency's efforts to maintain an accessible website and track accessibility status of other		

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Action Step ID **141 TDHCA Requested a HUD Waiver to Increase Fair Market Rents and Expand Tenant Choice in the ESG Program**

Begin Date: 2/17/2016 COMPLETED - 11/21/2016 Single Family H

Summary TDHCA requested two waivers from HUD for the flexibility to exceed the fair market rent (FMR) - one request in January 2015 and one in September 2015. The purpose of the waivers was to ensure ESG program participants can rapidly find habitable units in a wider array of neighborhoods, especially in markets where the costs of rents are rising and where vacancy of rental units is low. Exceeding the FMR allows the Department to affirmatively promote fair housing choice by expanding participants' ability to move or remain in higher opportunity neighborhoods that may have a more expensive rental market. TDHCA requested an FMR waiver in areas in which the PHA had an approved payment standard that was higher than the FMR and 120% FMR for persons with disabilities. HUD indicated that more specificity was needed in the waiver – see action step 191, during which this request was completed.

Action Step ID **143 HOME Notice of Funding Availability, Points Awarded for Supportive Services**

Begin Date: 9/4/2015 COMPLETED - 8/3/2017 Single Family H

Summary In 2015 HOME program points were provided to Tenant Based Rental Assistance (TBRA) applicants with supportive services in the categories of child care, nutrition, job training, health, and human services activities. TBRA administrators that provide more holistic approach to assisting families help to remove barriers to mobility and provides more housing choice through their knowledge of housing stock in the community. Competitive application scoring criteria was embedded into the HOME Rules effective August 3, 2017 (10 TAC § 23.25).

Action Step ID **144 Loan Servicing Outreach to Educate Borrowers on Homestead Exemptions, Lower Tax & Insurance Payments, and Increase Affordability**

Begin Date: 7/1/2015 ONGOING Single Family H

Summary The Loan Servicing division of the Department processes tax and insurance payments for TDHCA borrowers. Staff reach out to borrowers that show no homestead exemption on the tax records, and provide information on applying for the exemption to lower tax payments and increase affordability through lower overall mortgage payments. Loan Servicing staff also provide information on other exemptions of which homeowners may be unaware and discuss the household shopping for lower insurance premiums, such as those for households over 65 years old and for people with disabilities.

Action Step ID **146 Secure Resources for Translation and Interpretation as Needed**

Begin Date: 1/1/2015 COMPLETED - 2/25/2015 Agency Wide H

Summary In February 2015 TDHCA secured two contracts for third party interpretation and translation services, one for the Spanish language, one for other languages. The agency publishes translated documents and resources as deemed necessary in the language access plan, or as requested while resources are available.

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Action Step ID	<b>149 TDHCA Attendance at the Opportunity Forum presented by University of Texas LBJ School of Public Affairs</b>		
Begin Date:	2/19/2016 COMPLETED - 2/19/2016	Agency Wide	<b>H</b>
Summary	TDHCA attended the February 2016 Opportunity Forum hosted by UT on racial and ethnic divides in education in an effort to gain more insight into educational access. Presentations discussed racial, ethnic, and economic disparities in education in the Austin metropolitan area. Panelists included an Austin Independent School District school board member, researchers within the College of Education, and the Executive Director from Austin Voices for Education and Youth.		
Action Step ID	<b>150 Revisions to the Undesirable Neighborhood Characteristics in the 2016 Multifamily Rules</b>		
Begin Date:	7/1/2015 COMPLETED - 12/1/2016	Multifamily	<b>H</b>
Summary	Rule changes were made so that Department policy would generate improved neighborhood conditions for tenants of multifamily properties funded by the Department. Undesirable neighborhood characteristics include census tracts with a poverty rate above 40% or a poverty rate above 55% in TDHCA Regions 11 and 13, violent crime rates above 18 per 1,000 persons as reported on neighborhoodscout.com, multiple vacant structures, development site within attendance zones of elementary, middle, and a high school that does not have a Met Standard rating by the Texas Education Agency. The rule requires disclosure of such features for any multifamily applications for funding rehabilitation of an existing property or new construction and that appropriate mitigation be submitted.		
Action Step ID	<b>152 Conduct Coordinated Access and Fair Housing Training Webinar for Emergency Solutions Grants Program</b>		
Begin Date:	11/13/2015 COMPLETED - 1/6/2016	Single Family	<b>H</b>
Summary	ESG, Fair Housing, and Legal staff collaborated to present materials on the intersection of coordinated access and fair housing during the monthly ESG learning opportunity webinar. Training components included information on screening for diversion and homelessness prevention, applying criteria evenly across protected classes, promoting choice, and referrals to eligible		
Action Step ID	<b>153 Implementation of House Bill 3311, Cap on Credits to Elderly Developments</b>		
Begin Date:	6/1/2015 COMPLETED - 11/1/2015	Multifamily	<b>H</b>
Summary	Staff implemented House Bill 3311, in regions containing a county that has a population in excess of one million; the Board cannot allocate more than the maximum percentage of credits available for elderly developments, unless there are no other qualified applications in the subregion. Staff utilized data which breaks households down by income, size, tenure and broad age groups, also known as HISTA data. The Department published maximum percentages for each affected area on its website.		
Action Step ID	<b>154 Implementation of House Bill 3311, Equalization of Scoring for General Population and Elderly Developments</b>		
Begin Date:	6/1/2015 COMPLETED - 11/1/2015	Multifamily	
Summary	Staff implemented House Bill 3311, the equalization of scoring for general population and elderly developments as required under HB 3311.		

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Action Step ID	<b>155 Designation of National Housing Trust Fund to Serve Extremely Low-Income Households</b>		
Begin Date:	11/2/2015 ONGOING	Multifamily	<b>H</b>
Summary	The National Housing Trust Fund (NHTF) is an affordable housing production program that complements existing Federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low-income households, including homeless families. NHTF funds may be used for the production or preservation of affordable housing through the acquisition or new construction of non-luxury housing with suitable amenities. Funds will be initially allocated through the Regional Allocation Formula and subject to affirmative marketing requirements. All NHTF-assisted units will be required to have a minimum affordability period of 30 years. Texas received an allocation of \$4,789,477 for program year 2016, executing the 2016 Grant Agreement in October 2017. In February 2018, staff executed the Grant Agreement of		
Action Step ID	<b>158 Attendance at the Opportunity Forum, Uniting our Divided City: Closing the Racial Wealth Gap</b>		
Begin Date:	4/4/2016 COMPLETED - 4/22/2016	Single Family	
Summary	TDHCA attended the University of Texas School of Law Opportunity Forum on Closing the Racial Wealth Gap, featuring speakers from the Federal Reserve Bank of Dallas, Texas Appleseed, and the UT School of Law. The event focused on Austin's persistent racial wealth divides. Speakers addressed disparities in homeownership rates, lending terms, and the ability to generate		
Action Step ID	<b>162 Development of a Tool to Gather Data Needed for the HOME Multifamily Site and Neighborhood Review</b>		
Begin Date:	3/1/2016 COMPLETED - 6/15/2016	Multifamily	<b>H</b>
Summary	Building on the internal checklist developed to complete HOME Multifamily site and neighborhood reviews (see step #136) staff developed a tool to pull and document Census data to comply with HUD rules. The tool pulls race, ethnicity, poverty, median income, and median rent for the specific Census Tract and county. The tool helps to streamline staff review and prevent data errors. The tool flags areas of concern if developments are in areas of racial or ethnic concentration, as defined in the state's		
Action Step ID	<b>163 Review Complaint Submission Process for TDHCA Programs</b>		
Begin Date:	4/1/2016 COMPLETED - 6/1/2016	Agency Wide	<b>H</b>
Summary	Fair Housing staff reviewed the requirements to submit a complaint to TDHCA. Staff revised the language to explicitly include a reasonable accommodation process for persons with a disability to submit a complaint over the phone. These revisions were incorporated into staff's Standard Operating Procedures.		
Action Step ID	<b>164 Translation of Vital Documents on TDHCA's Website to Ensure Meaningful Access for Beneficiaries with Limited English Proficiency</b>		
Begin Date:	5/2/2016 COMPLETED - 8/31/2016	Agency Wide	<b>H</b>
Summary	Staff identified and prioritized TDHCA's web content and online information subject to the Language Access Plan. Appropriate webpages were translated including the following pages: complaints, Help for Texans, public information requests, and programs that directly serve beneficiaries including Section 8. Content was translated into Spanish per the Language Access Plan, and other languages as deemed necessary (see also step #193).		

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Action Step ID	<b>166 Revise Homelessness Program Rules to Strengthen Affirmative Marketing and Tenant Selection Criteria Requirements</b>		
Begin Date:	4/8/2016 COMPLETED - 11/10/2016	Single Family	<b>H</b>
Summary	Staff drafted rule changes to the Emergency Solutions Grants and Homeless Housing and Services Program to align with fair housing goals. Revisions include affirmative marketing requirements to market to those least likely to apply for services and tenant selection criteria to ensure reasonable accommodation and Violence Against Women Act notifications occur with any adverse action. The final version of the rules was approved by the Board at the November 10, 2016 TDHCA board meeting under 10 TAC § 7.13, Inclusive Marketing.		
Action Step ID	<b>167 Conduct Webinar for HOME Single Family Subrecipients on Requirements to Address Persons with Limited English Proficiency</b>		
Begin Date:	5/17/2016 IN PROGRESS	Single Family	<b>H</b>
Summary	TDHCA ensures that clients of the Department have meaningful access to services, programs and activities although they may be limited in their English language proficiency. TDHCA will provide training on how to create a language access plan in 2017 to ensure subrecipients of Department HOME funds understand vital documents; how to use of a checklist for creating a Language Access Plan, and will provide a sample LAP.		
Action Step ID	<b>168 Attend Texas Interagency Council for the Homeless (TICH) Meeting, Provide Fair Housing Update</b>		
Begin Date:	5/18/2016 COMPLETED - 7/12/2016	Agency Wide	<b>H</b>
Summary	Fair housing staff attended the July TICH meeting and presented an update on fair housing in Texas. Staff also discussed possible fair housing related changes to the Emergency Solutions Grants and Homeless Housing and Services Program. The proposed rule changes relate to affirmative marketing requirements and tenant selection criteria.		
Action Step ID	<b>172 Review TDHCA's Website Accessibility for Persons with Limited English Proficiency (LEP)</b>		
Begin Date:	4/21/2016 IN PROGRESS	Agency Wide	<b>H</b>
Summary	Staff are reviewing TDHCA's website to ensure clients of the Department have meaningful access to services, programs and activities although they may be limited in their English language proficiency. A website Language Access Plan team was developed to provide guidance for web liaisons and a systematic review of all webpages.		
Action Step ID	<b>174 Analysis of Homebuyer Data Trends</b>		
Begin Date:	2/12/2016 COMPLETED - 7/4/2016	Single Family	
Summary	Fair Housing staff analyzed the Texas Homeownership lending activity for the past five years, looking at statewide distribution. Program expansion over time was mapped in ArcGIS ("Geographic Information System") by lending activity (loans, mortgage credit certificates, and combos). The lender network was compared to the statewide population distribution. Staff recommended specific outreach efforts based on the data and possible underserved areas.		

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Action Step ID	<b>177 Participate on a Texas Affiliation of Affordable Housing Providers (TAAHP) Panel Discussion on Affirmatively Furthering Fair Housing</b>		
Begin Date:	5/3/2016 COMPLETED - 7/26/2016	Multifamily	<b>H</b>
Summary	Fair Housing staff spoke on a panel at the 2016 Texas Housing Conference for TAAHP. The panel is entitled "Fair Housing Choices" and appeared under the Legislative Track. TAAHP is a non-profit 501(c)(6) trade association serving affordable housing industry providers. TAAHP's principal goal is to increase the supply and quality of affordable housing for Texans with limited incomes and special needs.		
Action Step ID	<b>178 Attended Webinar on Advocacy Strategies for Protecting the Fair Housing Rights of People with Criminal Records</b>		
Begin Date:	5/20/2016 COMPLETED - 6/7/2016	Agency Wide	<b>H</b>
Summary	Fair Housing staff attended the Shriver Center and the National Housing Law Project joint webinar addressing the intersection of fair housing issues and persons with criminal records. Adverse housing decisions based on a person's criminal record screening may violate the Fair Housing Act, which prohibits discrimination on the basis of race. The presentation provided a summary of HUD policies relating to the use of criminal records, an overview of HUD guidance, and common issues related to tenant screening, eviction policies, due process rights, blanket bans, reasonable look back periods, discretion and denials.		
Action Step ID	<b>179 Revise the Department's Language Access Plan (LAP)</b>		
Begin Date:	5/5/2016 COMPLETED - 9/2/2016	Agency Wide	<b>H</b>
Summary	TDHCA's Language Access Plan (LAP) was revised to reflect updated language service protocols. The agency procured third-party translation and interpreting services through two vendors available on an as-needed basis. Language addressing current points of contact between the Department and client populations was updated to include Spanish-speaking contacts within the Department. The revised LAP is posted on TDHCA's website.		
Action Step ID	<b>181 Revision of the Fair Housing Training Component for the Emergency Solutions Grants (ESG) Implementation Workshop</b>		
Begin Date:	6/10/2016 COMPLETED - 8/9/2016	Single Family	<b>H</b>
Summary	Staff revised presentation materials for the ESG 2016 Implementation Workshop series held in August 2016. The presentation covered fair housing topics including civil rights laws, reasonable accommodations, affirmative outreach, limited English proficiency, language access plans, use of criminal records, and equal access and non-discrimination policies for protected classes. The webinar was presented on August 9, 2016.		
Action Step ID	<b>182 Section 811 Project Rental Assistance (PRA) Program, Marketing to Project-Based Section 8 Properties in High Opportunity Areas</b>		
Begin Date:	2/5/2016 COMPLETED - 6/15/2016	Single Family	<b>H</b>
Summary	Fair housing staff mapped Project-Based Section 8 Properties along with the 2016 Qualified Allocation Plan, Opportunity Index points. The analysis was provided to Section 811 PRA Program staff to help identify properties for possible participation in the Section 811 PRA Program (see also step #93).		



## TDHCA Fair Housing Action Steps by Impediment

**Action Step ID 183 Data Update for the Multifamily Affirmative Fair Housing Marketing Tool**

Begin Date: 4/1/2016 ONGOING Multifamily **H**

Summary Fair Housing, Data Management, and Reporting staff is currently researching a possible data update to the Multifamily Affirmative Fair Housing Marketing Tool. The update would address the change in demographic data reported by properties to align with available Census data. In January 2017 the Contract Monitoring and Tracking System (CMTS) data entry screens were updated to include demographic data in up to five race categories. This change was implemented as a result of the Housing and Economic Recovery Act of 2008 which required the Department to annually report certain information to HUD, including the race of each household member. The tool currently uses 2010 Census data; an update has been discussed with Compliance, Legal, and Information Systems to use American Community Survey data to reflect a more recent time period (see also step #1).

**Action Step ID 184 TDHCA Attendance at Webinar on HUD Guidance on the Limitations of Using Criminal History**

Begin Date: 7/15/2016 COMPLETED - 7/28/2016 Agency Wide **H**

Summary The US Department of Housing and Urban Development's (HUD) Office of General Counsel issued guidance on April 4, 2016, for all property owners and managers on the use of criminal history in tenant screening and other adverse housing decisions. National experts from different perspectives provided a balanced, comprehensive explanation of the guidance and its implications. TDHCA Fair Housing and Compliance staff attended the webinar on July 28, 2016.

**Action Step ID 187 Fair Housing Training, Emergency Solutions Grants 2016 Implementation Workshop**

Begin Date: 6/15/2016 COMPLETED - 8/9/2016 Single Family **H**

Summary Staff conducted a 60 minute webinar on fair housing during the 2016 Emergency Solutions Grant (ESG) Implementation Workshop held in August 2016. Materials covered fair housing topics including civil rights laws, reasonable accommodations, affirmative outreach, limited English proficiency, language access plans, use of criminal records, and equal access and non-discrimination policies for protected classes, fair housing complaints, and fair housing documentation (see also step #151).

**Action Step ID 188 Staff Attended Webinar Training "Breaking Down Barriers to Opportunity: Transportation and the Affirmatively Furthering Fair Housing Rule"**

Begin Date: 8/15/2016 COMPLETED - 8/17/2016 Agency Wide **H**

Summary Staff attended a webinar on the Affirmatively Furthering Fair Housing (AFFH) Rule. The training included information on integrated assessment and planning approaches to examine patterns of disinvestment and barriers to opportunity. Presentations included methods to foster the alignment of investments in transportation, housing, job centers and economic development that fosters access to opportunity.

## TDHCA Fair Housing Action Steps by Impediment

**Action Step ID 189 Track Conciliation and Cause Notifications from Texas Workforce Commission, Civil Rights Division**

Begin Date: 6/1/2016 ONGOING Multifamily **H**

Summary Staff tracks conciliation agreements and cause notifications from Texas Workforce Commission, Civil Rights Division regarding fair housing complaints at TDHCA-funded properties. Texas Workforce Commission notifies TDHCA per a memorandum of understanding. Agreements are attached to property records in the Compliance Monitoring and Tracking System for TDHCA staff to reference. This will assist the agency in monitoring and working with properties to mitigate fair housing barriers and take corrective actions.

**Action Step ID 191 TDHCA Staff Provided Testimony at the Senate Intergovernmental Relations Committee**

Begin Date: 8/1/2016 COMPLETED - 8/15/2016 Agency Wide **H**

Summary TDHCA staff provided invited testimony at the August 15, 2016, Texas Senate Intergovernmental Relations committee hearing. The committee heard testimony on interim charges including Charge 5, "Review existing statute and rules that govern the Texas Department of Housing and Community Affairs in light of the recent Supreme Court decision in Inclusive Communities Project, Inc. vs. TDHCA, et al. and recommend if any modifications are necessary to conform to the decision."

**Action Step ID 192 Emergency Solutions Grants (ESG) Request for HUD Waiver to Exceed Fair Market Rents (FMR) in Specific Markets**

Begin Date: 7/1/2016 COMPLETED - 11/21/2016 Single Family **H**

Summary On July 29, 2016, the Department requested a waiver from HUD of 24 CFR § 576.106(d) of FMR rent to allow 2016 TDHCA's subrecipients to adopt a payment standard for ESG rapid re-housing and homelessness prevention for housing units with rents exceeding HUD's FMR in areas where the Public Housing Authority has adopted a payment standard that is greater than HUD's FMR. The waiver request is for ESG subrecipients operating in Houston, Harris County, and Austin County. In addition the Department requested a waiver for subrecipients in the Dallas Metropolitan Fair Market Rent Area and Laredo to use the small area FMRs for Collin, Dallas, Denton, Ellis, Hunt, Kaufman, Rockwall, and Webb counties. HUD approved the waiver requests for all counties listed in this paragraph, except for Laredo. Laredo was excepted because the small area FMR was expiring. The waiver is in effect from November 21, 2016, to November 21, 2017.

**Action Step ID 193 Analysis of Limited English Proficiency Populations within the Section 8 Program Service Areas**

Begin Date: 8/1/2016 COMPLETED - 3/2/2017 Single Family **H**

Summary Staff conducted an analysis of the language access needs for persons with limited English proficiency for both Section 8's statewide program and the 34 county service area. Staff will use the analysis to ensure application materials and marketing are done to attract the least likely to apply and ensure equal access. Language access plans assist with fair housing barriers based

## TDHCA Fair Housing Action Steps by Impediment

### Action Step ID **195 Presentation at the Texas Municipal League 2016 Conference**

Begin Date: 8/1/2016 COMPLETED - 10/5/2016

Agency Wide

**H**

Summary TDHCA's Executive Director at the time, Tim Irvine, presented at the 2016 Texas Municipal League Conference on a panel entitled Affordable Housing as Economic Development with an intended purpose of combatting NIMBYism. The presentation included information on job creation, positive fiscal impacts for government, improved worker retention, and affordable housing as an investment in children, safe neighborhoods, working families, and opportunity for Texans. The Texas Municipal League serves 1,152 cities across Texas.

### Action Step ID **196 Expanded Homeownership Opportunities through New Master Servicer**

Begin Date: 10/1/2016 COMPLETED - 10/1/2016

Single Family

Summary Effective October 1, 2016, the Department is utilizing Idaho Housing and Finance Association (Idaho HFA) as master servicer for the Texas First Time Homebuyer Program, the My First Texas Home Program, and other first-time homebuyer programs that may be implemented by the Department. The Department's previous master servicer contract expired on September 30, 2016. The Department offers expanded homeownership opportunities and increased lending options for households at risk for predatory and high cost loans. The Department now has reduced credit score requirements, decreased debt to income ratio, and the availability of manual underwriting. The Department currently provides financing, including down payment and closing cost assistance, to low and moderate-income first-time homebuyers through the My First Texas Home Program and through the issuance of single family mortgage revenue bonds.

### Action Step ID **197 Analyze and Modify Section 8 Fair Market Rents – 2017**

Begin Date: 9/1/2016 COMPLETED - 12/17/2016

Single Family

**H**

Summary Staff examined county fair market rents (FMRs), small area fair market rents (SAFMRs) and hypothetical small area fair market rents by zip code to determine if FMRs in the Department's Section 8 service area needed to be adjusted to expand tenant housing choice. The Department's Public Housing Authority (PHA) may establish payment standards between 90 and 110 percent of the FMR. The establishment of the standard is important because it essentially determines whether a household will be able to find a unit they can afford with the voucher the Department issues. In areas where market rents are high and there is high demand for rental units it can be challenging for a voucher holder to find a unit. Increased FMRs aid in areas where voucher holders have difficulty in finding acceptable units or affording units in more desirable areas. Higher FMRs provide additional choices and opportunities to tenants in highly competitive rental markets. Payment standards were approved at TDHCA's November 10, 2016 Board meeting. On November 16, 2016 HUD released a Notice of Final Rulemaking regarding the use of Small Area FMRs in certain metropolitan areas for the Housing Choice Voucher Program. TDHCA staff revised the FMRs under the new guidance and received Board approval on December 17, 2016 for the 2017 Payment Standards.

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **198 Fair Housing Staff Attended Webinar on Ensuring Fair Housing for People with Criminal Records**

Begin Date: 10/26/2016 COMPLETED - 10/26/2016 Agency Wide **H**

Summary To expand Fair housing staff's familiarity with the intersection between protected class and criminal background, staff attended a webinar with the Shriver Center and officials from HUD addressing HUD's recent guidance ensuring fair housing for people with criminal records. Criminal records can be a barrier to accessing housing for millions of Americans. HUD's guidance states that admission denials, evictions, and other adverse housing decisions based on a person's criminal record may constitute racial discrimination under the Fair Housing Act. The webinar included a sample policy from the New Orleans Housing Authority.

Action Step ID **199 Submit Second Round of Comments on HUD's Assessment of Fair Housing Tools for States, Local Governments, and Public Housing Authorities**

Begin Date: 9/1/2016 COMPLETED - 10/28/2016 Agency Wide **H**

Summary TDHCA submitted comments during the second public comment period for the US Department of Housing and Urban Development's (HUD) proposed Assessment of Fair Housing (AFH) tool for states and insular areas, local governments, and public housing authorities. TDHCA commented that applying HUD's proposed tool to the housing tax credit program and state-administered programs are outside HUD's statutory authority given to it by Congress. Comments also expressed concerns that the tool promotes race based decision-making by recipients of HUD funds in violation of the Equal Protection Clause of the U.S. Constitution. TDHCA received feedback from the Fair Housing Workgroup in submitting comments.

Action Step ID **200 Revised 2017 Section 8 Payment Standards for the Housing Choice Voucher Program (HCVP) for Certain Counties**

Begin Date: 11/16/2016 COMPLETED - 1/1/2017 Single Family **H**

Summary November 16, 2016 the U.S. Department of Housing and Urban Development (HUD) released a final rule in the Federal Register providing that for certain specific areas Small Area Fair Market Rents (SAFMRs) must be utilized. SAFMRs were created by HUD, in response to increasing demand for more localized measures of rents, and are published at the ZIP code level for all metropolitan areas. SAFMRs, by being more localized seek to provide clients with access to a broader range of neighborhoods, thus allowing them to move into areas with more employment, transportation and educational opportunities. This rule affects seven counties in the Department's HCVP jurisdiction, Bandera, Comal, Denton, Ellis, Guadalupe, Johnson, and Wilson counties. These new payment standards were approved by the Board at the December 15, 2016 TDHCA board meeting. The standards became effective on January 1, 2017.

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Action Step ID	<b>203 Loan Agreement with WoodForest National Bank, Expanding Financing Options Available to Lower Income Homebuyers</b>		
Begin Date:	9/1/2016 COMPLETED - 7/31/2017	Single Family	
Summary	On September 28, 2016, TDHCA entered a \$10 million loan agreement with WoodForest National Bank. The loan agreement allows the agency to leverage existing funds and expand financing options available to lower income homebuyers in Texas, including reducing the agency's first mortgage loan rate by approximately .375 percent, a tremendous savings to homebuyers. The loan agreement will fund down payment and closing cost assistance in conjunction with approximately \$250 million in first lien mortgage loans and \$10 million in 30-year, zero interest, second lien mortgage loans that are due on the earlier of sale, refinance, or maturity of the first lien mortgage loan. In the fall of 2016 the Department experienced more than twice the amount of average daily reservations for homebuyer assistance funds compared to the prior 12 months of activity. Funds were		
Action Step ID	<b>204 Continuum of Care Local Competition Award Model</b>		
Begin Date:	1/15/2015 COMPLETED - 11/13/2017	Single Family	<b>H</b>
Summary	In order to foster local decision making, the Emergency Solutions Grant (ESG) has been working with Continuum of Care (CoC) lead agencies to administer a local competition on behalf of TDHCA for ESG funds. The lead agencies adjust the notice of funding availability, and elements of competitive scoring to consider elements such as past performance and future target outcomes. This model assists the program area in better evaluating barriers, impediments, and program metrics by leveraging the CoC local capacity and expertise. A pilot local competition was run in 2015 resulting in more local connections and coordination. In 2016, TDHCA expanded the pilot program for local competitions from two CoC Lead Agencies to five CoC Lead Agencies. In 2017, TDHCA worked with four CoC Lead Agencies to run a local competition for ESG funds.		
Action Step ID	<b>205 Waiver Request, Fair Market Rents</b>		
Begin Date:	2/21/2017 COMPLETED - 12/31/2017	Single Family	<b>H</b>
Summary	The Department is researching the need for an expansion of HUD's waiver of Fair Market Rents (FMRs) in certain counties for 2017 Emergency Solutions Grant (ESG) Subrecipients. A waiver was previously granted by HUD for certain counties for 2016 ESG Subrecipients. The necessity to request a new waiver in certain areas of the state for certain ESG activities may be supported if it is determined that services cannot be provided under the regulatory limitations.		
Action Step ID	<b>207 Fair Housing Webinar Series 2017: Webinar Two - Reasonable Accommodations and Accessibility</b>		
Begin Date:	12/15/2016 COMPLETED - 4/11/2017	Agency Wide	<b>H</b>
Summary	Implementation of a two part webinar series in coordination with the Texas Workforce Commission Civil Rights Division. The presentation covered reasonable accommodations and accessibility including information on service and assistance animals. Over 400 attendees participated in the webinar. Trainings are geared towards city, county, and local governments, housing providers, housing consumers and other fair housing partners.		

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Action Step ID **210 Fair Housing Training Presentation to Relocation Contractors**

Begin Date: 6/15/2017 COMPLETED - 7/11/2017 Single Family **H**

Summary The Fair Housing Project Manager conducted a training call with relocation contractors. Relocation contractors help individuals in nursing facilities transition to community settings. They assist the state in rebalancing its Medicaid program so more funds are spent on community-based long term services and supports, and fewer funds are paid to institutional settings, like nursing facilities. The relocation contractors utilize various TDHCA programs including Project Access and Section 811. Presentation materials focused on reasonable accommodations for persons with disabilities and information on HUD’s guidance related to

Action Step ID **212 Participate in Texas Interagency Council for the Homeless (TICH) Meeting, Provide Fair Housing Update**

Begin Date: 3/1/2017 COMPLETED - 4/11/2017 Single Family **H**

Summary Fair housing staff attended the April TICH meeting and presented an update on fair housing in Texas. Staff provided information on the 2017 fair housing webinar series and invited TICH members to attend. In addition, staff provided an update on HUD's Affirmatively Furthering Fair Housing rule and the State's plans to comply with the new rule and complete an Assessment of Fair Housing.

Action Step ID **215 Conduct Focus Groups and Survey Housing Tax Credit Residents**

Begin Date: 2/24/2017 COMPLETED - 3/22/2018 Multifamily

Summary The Department contracted with the Ray Marshall Center of the University of Texas at Austin to conduct a series of focus groups and a resident survey among residents living in properties funded by Housing Tax Credits. The goal was to gather feedback on the most important housing and community characteristics to residents so that the Department can best meet low- to moderate-income residents’ needs. The three focus groups gave residents an opportunity to share their experiences. The moderators of these focus groups sought to attract diverse crowds that reflect the variety of residents that the Department serves—rural, elderly, families. The survey was available in both online and paper formats, with paper surveys being heavily weighted towards elderly and rural Developments. Like the focus groups, the survey sought residents’ varied perspectives on the type of unit, Development, and neighborhood features that best meet their needs.

With this knowledge tabulated in datasets, staff is now able to ask specific research questions about the needs of residents based on geographic, socio-economic, and demographic criteria. Such a tool might allow for the Department to create rules tailored to the specific needs of the populations served. Findings from this data set may also play a part in the Multifamily Finance Division’s monthly roundtables for discussing the 2019 Qualified Allocation Plan and Uniform Multifamily Rules with stakeholders. Staff anticipate releasing a report on the resident survey in March 2018.

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Action Step ID **222 Conference Presentation Proposal, Texas Association of Local Housing Finance Agencies (TALHFA)**

Begin Date: 4/14/2017 COMPLETED - 10/27/2017 Agency Wide **H**

Summary Fair Housing staff submitted a conference proposal to present at the annual TALHFA meeting in October 2017. The proposal, Fair Housing Considerations for Housing Finance Agencies, would provide an overview of fair housing principles and permitting in a non-discriminatory manner as it relates to the Fair Housing Act. The presentation would review accessibility requirements such as unit design, 2010 ADA standards, and the distribution of accessible units. The presentation proposal was ultimately not

Action Step ID **223 47**

Begin Date: 6/2/2017 COMPLETED - 12/14/2017 Multifamily **H**

Summary The Department's Tenant's Rights and Resources Guide (created in 2015, see Step #47) was revised to more clearly inform tenants of Department monitored properties of their rights and to provide important guidance and resources. The guide was reorganized and rewritten for a simpler reading level. The revised version is available in an easy to read, fillable format for properties. It provides a general outline of what property owners must do and what they may not do and includes consolidated complaint information, which offers instructions regarding who to contact for Fair Housing, property and general complaints. The guide has been translated into Spanish and is available in other languages upon request.

Action Step ID **224 Analyze and Modify Payment Standards for the Housing Choice Voucher Program (HCVP) – 2018**

Begin Date: 10/20/2017 COMPLETED - 12/14/2017 Single Family **H**

Summary Staff examined county fair market rents (FMRs) and small area fair market rents (SAFMRs) by zip code to determine if payment standards for the Department's Housing Choice Voucher Program service area needed to be adjusted to expand tenant housing choice. The Department's Public Housing Authority (PHA) may establish payment standards between 90 and 110 percent of the FMR except in certain counties in the Dallas Metropolitan Statistical Areas, where HUD requires the use of SAFMRs as the payment standard. The establishment of the standards is important because it essentially determines whether a household will be able to find a unit they can afford with the voucher the Department issues. In areas where market rents are high and there is high demand for rental units it can be challenging for a voucher holder to find a unit. Increased FMR aid in areas where voucher holders have difficulty in finding acceptable units or affording units in more desirable areas. Higher FMRs provides additional choices and opportunities to tenants in highly competitive rental markets. Payment standards were approved at TDHCA's December 14, 2017, board meeting (see also step #38, #133, and #196).

Action Step ID **225 Meeting with the Office of Minority Health Statistics and Engagement**

Begin Date: 9/8/2017 COMPLETED - 11/28/2017 Agency Wide **H**

Summary Department staff met with staff from the Office of Minority Health Statistics and Engagement within Health and Human Services (HHS) to learn about their work and discuss possible collaborations. TDHCA discussed requesting a poverty simulation to train staff. Department staff requested a copy of the equity analysis "how-to" guide from the Office of Minority Health Statistics and

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Engagement. The guidance document offers a method to measure disproportionality and disparities and will be available in 2018. The poverty simulation for staff is planned for spring 2018.

Action Step ID	<b>227 Revised Request for Qualifications for Fair Housing Training Providers</b>		
Begin Date:	7/1/2017 COMPLETED - 3/1/2018	Single Family	
Summary	In September 2017, staff revised the request for qualifications for fair housing training providers. Under the revised RFQ, the trainings for development owners and management companies must cover specific fair housing content including protected classes, reasonable accommodations and modifications, design and construction standards, and recently released HUD guidance. Five hours of fair housing training is required under 10 TAC § 10.402(e)(1)(a) and 10 TAC § 10.402(e)(1)(b). The criteria are effective January 1, 2018 (see also step #45).		
Action Step ID	<b>229 Fair Housing Training, Emergency Solutions Grants 2017 Implementation Workshop</b>		
Begin Date:	7/1/2017 COMPLETED - 10/18/2017	Single Family	<b>H</b>
Summary	Staff conducted a 60 minute webinar for Emergency Solutions Grant (ESG) administrators during the 2017 Implementation Workshop. The presentation focused on fair housing and civil rights within the ESG program. Materials covered protected classes, use of criminal records, reasonable accommodations, limited English proficiency, affirmative outreach, the Violence Against Women Act of 2013, fair housing complaints, and fair housing documentation (see also step #46, 151, 180, 186).		
Action Step ID	<b>230 Emergency Solutions Grants (ESG) Learning Opportunity on Language Access Plans</b>		
Begin Date:	8/1/2017 COMPLETED - 1/3/2018	Single Family	<b>H</b>
Summary	The January 2018 ESG learning opportunity covered language access plans and limited English proficiency. The webinar provided a step-by-step process on how to create a language access plan, where to find data on language needs, and examples of when to provide language access. Language access plans assist with fair housing barriers based on national origin (see also step #124).		
Action Step ID	<b>233 Webinar, Single Family Programs: Fair Housing &amp; Affirmative Marketing Under 10 TAC § 20.9</b>		
Begin Date:	7/1/2017 COMPLETED - 11/2/2017	Single Family	<b>H</b>
Summary	The Department hosted a webinar training for single family program administrators of the HOME Investment Partnerships Program, State Housing Trust Fund, Neighborhood Stabilization Program, Amy Young Barrier Removal Program, Colonia Self Help Centers, and Texas Bootstrap Loan Program on the new Fair Housing, Affirmative Marketing and Reasonable Accommodations rule (10 TAC 20.9). The presentation addressed highlights of the new rule, demonstrated the single family affirmative marketing tool, and provided examples to help guide best practices.		
Action Step ID	<b>234 Training to Amy Young Barrier Removal Program Administrators on 10 TAC § 20.9</b>		
Begin Date:	7/1/2017 COMPLETED - 10/11/2017	Single Family	
Summary	The Fair Housing Project Manager presented at the Amy Young Barrier Removal Program administrators training workshop on 10 TAC §20.9 Fair Housing, Affirmative Marketing and Reasonable Accommodations. The presentation addressed highlights of the		



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new rule, demonstrated the single family affirmative marketing tool, and provided examples to help guide best practices.

Action Step ID	<b>237 Compliance Division Comprehensive Portfolio Review of Policies and Procedures</b>		
Begin Date:	10/27/2017 ONGOING	Multifamily	<b>H</b>
Summary	Effective October 24, 2017, the Compliance Division began offering properties in the Department’s portfolio a new approach to review Written Policy and Procedure requirements under 10 TAC §10.610. These policies and procedures include tenant selection criteria, reasonable accommodations policy, wait list policy, denied applicant policy, non-renewal and/or termination policy, and unit transfer policy. Owners may elect to have these policies reviewed for their entire portfolio at once rather than having them reviewed for each individual property as part of the onsite monitoring review process. The Department hopes that the new procedure will better serve owners and management companies by streamlining the process in which they are reviewed, and ensuring equitable applicability of requirements, while ensuring compliance with Department rules. Once approved, the policies will not be reviewed again until either they are revised, or 10 TAC §10.610 is amended. If neither of the events occurs, the Written Policy and Procedures will be reviewed every three years. Application fees will continue to be		
Action Step ID	<b>238 Request to Create Fund to Mitigate Damages Caused by Tenants in the Section 811 Program</b>		
Begin Date:	3/1/2018 ONGOING	Single Family	<b>H</b>
Summary	The Department through Money Follows the Person Demonstration funds provided by Texas Health and Human Services (HHS) requested and was awarded funding to cover the cost of unreimbursed damages caused by Section 811 PRA Program tenants as a result of their occupancy. The funds, \$75,000 will be used on an as-needed basis if a tenant participating in the Section 811 PRA Program incurs eligible expenses. Damage claims are limited, and will only be used to cover itemized, unreimbursed costs for damages resulting directly from the tenant’s occupancy.		
Action Step ID	<b>240 HOME Allowance for Additional Funds for Accessible Features</b>		
Begin Date:	8/1/2017 COMPLETED - 8/3/2017	Single Family	<b>H</b>
Summary	The HOME Program under Homeowner Rehabilitation (HRA), Contract for Deed, and Single Family Development activities permits up to \$10,000 in direct costs in excess of the program maximum to be requested for homeowners requesting accessible features and for large families. This rule appears in HOME rules, 10 TAC § 23.31 (d)(1), § 23.31(e)(3), § 23.71(f)(1), §23.71(g)(3), §23.51(f)(2), § 23.51(g)(3).		
Action Step ID	<b>244 Created Glossary of Mortgage Terms</b>		
Begin Date:	6/1/2005 COMPLETED - 10/1/2016	Single Family	
Summary	The Department’s homebuyer webpage includes a glossary of mortgage terms for use by consumers and prospective homebuyers. The glossary helps consumers understand terms such as points, private mortgage insurance, amortization, and earnest money. This action step helps address impediments related to improving consumer knowledge of mortgage loan options. Staff periodically update the glossary of mortgage terms as needed, the last update was completed in 2016.		

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Action Step ID	<b>245 Exploring a Website Refresh for Homebuyer Web Pages</b>		
Begin Date:	3/5/2018 ONGOING	Single Family	
Summary	Homebuyer staff, in collaboration with the Division of Policy and Public Affairs, is exploring a website refresh for the homebuyer web pages. The web refresh will include content written at a ninth grade reading level and web pages that are easier for consumers to navigate. Staff anticipates moving forward with the website refresh in 2018.		
Action Step ID	<b>246 Streamlined Communications with Partner Public Housing Authorities for Section 8 Voucher Porting</b>		
Begin Date:	6/1/2013 ONGOING	Single Family	<b>H</b>
Summary	Section 8 program staff have streamlined communications with numerous large Public Housing Authorities (PHAs) to which Department voucher households frequently request a port (transfer). Staff have developed relationships with our largest port recipient PHA's to understand and discuss policies and rules for porting households. Because households that wish to port must re-qualify for the program and may encounter issues with the background check or other criteria, staff now communicates these possible barriers and options to households prior to porting.		
Action Step ID	<b>248 Fair Housing Training Planned for Housing Choice Voucher Section 8 Program Staff</b>		
Begin Date:	2/28/2018 COMPLETED - 5/31/2018	Single Family	<b>H</b>
Summary	Fair housing staff conducted a fair housing training for Housing Choice Voucher Section 8 program staff in spring 2018. The training included an overview of fair housing protected classes, issues and discriminatory practices, as well as reasonable accommodations and modifications. Staff reviewed common issues encountered by program staff and HUD guidance related to the use of criminal records.		
Action Step ID	<b>250 Provided a Webinar on Reasonable Accommodations and Accessibility to Celebrate Fair Housing Month 2018</b>		
Begin Date:	4/1/2018 COMPLETED - 4/17/2018	Agency Wide	<b>H</b>
Summary	The Department, in conjunction with the Texas Workforce Commission's Civil Rights Division, hosted webinars during April 2018's 50th Anniversary of the Fair Housing Act on April 17, 2018. Topics covered included reasonable accommodations, service and assistance animals. This webinar had over 300 participants.		
Action Step ID	<b>251 The 811 Program Design Promotes Choice and Integration for Persons with Disabilities</b>		
Begin Date:	2/19/2013 ONGOING	Single Family	<b>H</b>
Summary	The Section 811 Project Rental Assistance (PRA) Program exclusively serves people with disabilities who are also part of the Section 811 target population, and have extremely low-incomes. The target population includes people transitioning out of institutions, persons with severe mental illness and young adults aging out of foster care. The Section 811 PRA program creates the opportunity for persons with disabilities to live as independently as possible through the coordination of voluntary services and providing a choice of subsidized, integrated rental housing options. The program requires that Section 811 units be		

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **254 811 Program Marketing Materials, Help Consumers Make Informed Housing Choices**

Begin Date: 2/19/2013 ONGOING Single Family **H**

Summary The Department’s Section 811 Project Rental Assistance (PRA) Program webpage is designed to be friendly to prospective tenants and contains information that allows prospective 811 clients to make informed housing choices. The webpage contains each property’s tenant selection criteria, webpage, maps, and information about unit accessibility. In addition, the Department, in coordination with our Medicaid state agency partners, developed marketing materials to better reach potential program applicants. Marketing materials include a one page document that describes property amenities such as fitness center, accessible units, number of bedrooms, and proximity to public transit and medical facilities.

Action Step ID **255 Bond, 4% Housing Tax Credit Rules Tie Breaker Factor Based on Housing De-Concentration Factors**

Begin Date: COMPLETED - 1/4/2018 Multifamily

Summary The Multifamily Housing Revenue Bond Rules in Section 12.4 (d) Scoring and Ranking, included tie breaker factors for 4% Housing Tax Credit (HTC) and Mortgage Revenue Bond (MRB) deals in the following order based on areas that are underserved: 1) Developments located in a Colonia 2) Developments in an economically distressed area 3) Developments in a census tract with no developments awarded less than 30 years ago 4) Developments in census tracts with no developments awarded less than 15 years ago, and 5) Developments in census tracts whereby it and all of the continuous tracts have not had a development awarded less than 15 years ago.

Action Step ID **256 Fair Housing Marketing Plan for the Section 811 Project Rental Assistance (PRA) Program**

Begin Date: 2/19/2013 ONGOING Single Family **H**

Summary The Section 811 Project Rental Assistance Program, as required by HUD, developed a fair housing marketing plan that identifies the least likely to apply populations. The least likely to apply populations are persons with limited English proficiency and persons whose disability is a developmental or intellectual disability. The plan is designed to reach these individuals so that they have the opportunity to apply for the program. All tenant-facing materials are available in English and Spanish, with other languages available upon request by local referral agents and applicants.

Action Step ID **263 Readoption of the Service Enriched Housing Rule**

Begin Date: 4/17/2018 COMPLETED - 12/31/2018 Agency Wide **H**

Summary Texas Government Code §2306.1091(b) requires the Department, with the advice and assistance of the Housing and Health Services Coordination Council (Council), to define Service-Enriched Housing. Staff consulted with the Council at the meeting on May 4, 2018, and the Council supported the readoption of the rule without changes. Service-Enriched Housing is defined in 10 TAC §1.11 as integrated, affordable, and accessible housing that provides residents with the opportunity to receive on-site or off-site health-related and other services and supports that foster independence in living and decision-making for individuals with disabilities and persons who are elderly. Staff anticipates presenting the rule for consideration by TDHCA’s board on

TDHCA Fair Housing Action Steps by Impediment

Action Step ID **265 Review Requested Preferences or Targets by HOME Program Administrators**

Begin Date: 4/13/2018 ONGOING

Single Family

**H**

Summary Administrators of the HOME program may request the ability to have a preference or target for assisting households. HOME Program funds operate under the State of Texas Consolidated Plan, One-Year Action Plan (OYAP). The 2017 OYAP identifies the following HOME special needs populations: persons with disabilities, persons with substance use disorders, persons living with HIV/AIDS, persons with Violence Against Woman Act protections, colonia residents, farmworkers, homeless populations, veterans, wounded warriors (as defined by the Caring for Wounded Warriors Act of 2008), and public housing residents. Administrators may also request to have preferences designed to assist single parents, persons transitioning out of incarceration, and persons transitioning out of foster homes and nursing facilities. FHDMR reviews data for the service and market area for the requested preference/targeted population alongside data on protected classes. FHDMR then drafts a recommendation, to allow or not allow the preference, based on balancing concerns to equally assist protected classes and the

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## **Appendix M - Public Comment Received**

Both written comments and comments received at public hearings are attached in the order designated. Transcripts of public hearings at which no public comment was received are not attached in this appendix.

### **Written Comment Received**

Michael Bates – Alliance of East Lubbock Neighborhood Associations

Christa Walikonis – Disability Rights Texas

Demetria McCain – Inclusive Communities Project

Jason Howell – Recovery People

Madison Sloan – Texas Appleseed

Amelia Adams – Texas Housers

### **Public Hearing Transcripts**

San Antonio, Texas – 4/10/19

Austin, Texas – 4/12/19

Lubbock, Texas – 4/16/19

Midland, Texas – 4/16/19

Dallas, Texas – 4/18/19

Victoria, Texas – 5/1/19



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May 6, 2019

### *Via electronic mail*

Texas Department of Housing and Community Affairs

Attn: Cate Tracz

P.O. Box 13941

Austin, Texas 78711-3941

Fax: 512-475-4595

Email: cate.tracz@tdhca.state.tx.us

Re: TDHCA Analysis of Impediments; Region 1; Lubbock

Dear Cate Tracz:

We write to you on behalf of the Alliance of East Lubbock Neighborhood Associations (“Alliance”), a group of neighborhood association leaders in East Lubbock including the Chatman Hill, Dunbar Manhattan Heights, Parkway Cherry Point, and Yellow House Canyon neighborhoods. These neighborhood associations and leaders have come together to address and overcome systemic barriers their neighborhoods face. The Alliance believes the Texas Department of Housing and Community Affairs’ (“TDHCA”) State Draft of Analysis of Impediments (“Draft AI”) should analyze Region 1’s barriers to fair housing and de-segregation differently, and update the Draft AI with more focused recommendations to overcome these barriers. The Alliance encourages TDHCA to incorporate the recommendations listed below as creative regional solutions to accomplishing the Draft AI recommendations.

### **1. Increase regional coordination and improve the public comment period as a creative solution to overcoming barriers to fair housing choice.**

While the Draft AI includes important identification of impediments to fair housing choice and provides several recommendations to overcome these barriers, the Alliance is greatly concerned that these are simply the same issues addressed in 2013.<sup>1</sup> While TDHCA acknowledges the lack of overall systemic change honestly,<sup>2</sup> they must seek different regional solutions and implementation processes since the impediments have not significantly improved over the last six years. The Alliance recommends the Draft AI increase and specify regional coordination while improving access to public participation.

---

<sup>1</sup> Texas Department of Housing and Community Affairs, Draft State of Texas Analysis of Impediments to Fair Housing Choice (Mar. 25, 2019, Draft Version for Public Review) 75, available at <https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-DRAFT.pdf>.

<sup>2</sup> *Id.* at 6.

Although the Draft AI recommends the need to regionally coordinate with local jurisdictions and regulatory agencies in general, the recommendation for Region 1 does not sufficiently explain how TDHCA will actually accomplish this recommendation locally.<sup>3</sup> Instead, like most regional sections, Region 1 only gives a statistical view of the communities. There is no mention of how TDHCA will work with regulatory agencies and local jurisdictions to overcome these chronic impediments. The Draft AI should add more specific regional coordination recommendations to affirmatively further fair housing.

The Draft AI even recommends in Recommendation #4 to “[a]ctively engage in the enforcement of the Fair Housing Act.”<sup>4</sup> One suggestion could be increased communication with Region 1 and other regions regarding their local Analysis of Impediments. As a recipient of federal funds, Lubbock, has a legal duty under the Fair Housing Act to affirmatively further fair housing.<sup>5</sup> The Analysis of Impediments (AI) in both the State and Lubbock should be a comprehensive, highly detailed, data-driven analysis of the specific housing problems currently impeding fair housing choice and contributing to racial segregation. The Alliance understands that the City of Lubbock was required to complete an AI in January, yet failed to do so. Since this local AI would benefit the State and the City of Lubbock to improve fair housing choice, TDHCA should coordinate with the City of Lubbock to learn about the local impediments to fair housing choice and also to require or assist Lubbock in completing their own comprehensive Analysis of Impediments. The Lubbock Consolidated Plans to affirmatively further fair housing is due in August 2019. The Alliance requests TDHCA work alongside the City of Lubbock to ensure the local AI is completed in a timely manner, and not ignored like the AI due in January. TDHCA and the City of Lubbock working together to share this information should help both Lubbock and TDHCA to accomplish their State and local goals of affirmatively furthering fair housing.

The Draft AI should also include a detailed plan to seek and incorporate meaningful community engagement and public comment. TDHCA acknowledges in Impediment #2 that “there is a lack of understanding of and awareness of resources on fair housing law, rights and duties available to local governments[.]”<sup>6</sup> Without proper regional community engagement, the Draft AI will fail to fully contemplate the regional barriers to fair housing choice. Nonetheless, the AI public engagement process,<sup>7</sup> while standard for State policy, does not actually result in meaningful discussion with the communities the Draft AI affects the most. During the Draft AI process, only 510 community members in the entire state of Texas and only 13 people in Lubbock engaged in the entire public comment process.<sup>8</sup> During the secondary Draft AI public comment period, only one member of the community in both San Antonio and Lubbock attended the public comment meetings. The Alliance believes there are better options to engaging communities throughout Lubbock, Region 1, and Texas.

Fair housing choice policy greatly affects the Alliance’s community. Therefore, TDHCA should pursue input to the Draft AI from groups like these through more than just a list-serv. Using only a list-serv disregards the barriers faced by individuals who lack access to or familiarity with online public participation processes. Communities like the Alliance are time and time again left in the dark as to the plans for their own neighborhood that will dictate their lives for years to come. Many neighborhoods like the Alliance groups are most affected and yet least consulted. This creates a massive deficit in understanding for how the neighborhood will interact with the policy.

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<sup>3</sup> *Id.* at 91, 464.

<sup>4</sup> *Id.* at 6.

<sup>5</sup> 42 U.S.C. § 3601 et. seq.; 24 C.F.R. §5, 91, 92 et. al.

<sup>6</sup> Texas Department of Housing and Community Affairs, Draft State of Texas Analysis of Impediments to Fair Housing Choice (Mar. 25, 2019, Draft Version for Public Review) 6, available at <https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-DRAFT.pdf>.

<sup>7</sup> *Id.* at 10-14.

<sup>8</sup> *Id.* at 13.

While TDHCA cannot control who comes to the meetings, they should explore a more creative and personal publication process. Therefore, TDHCA should regionally coordinate access and publication of these meetings by developing an ongoing list of non-profit groups, neighborhood associations, City coordinators and others effected by fair housing choice planning processes. In order for historically disenfranchised communities to overcome housing barriers, please make greater efforts to contact and work with those most impacted by this policy. We invite you to reach out to us during the next fair housing choice project to better understand the issues we face.

## **2. Analyze State and regional patterns of historical and current segregation or race-related impediments to understand and solve impediments to fair housing choice.**

The first step to understanding the lack of fair housing choice is understanding historic patterns of segregation. An important example of documenting the history of government and private policies on segregation and historical oppression came from a TDHCA attended presentation.<sup>9</sup> The presenter spoke on “explicit government policies that created and maintained de jure residential segregation including policies from the New Deal agencies like the Public Works Administration, the Federal Housing Administration, local housing authorities, and the Internal Revenue Service. The research aims to create a broader awareness of the government policies that created segregation as a first step to undertake specific action steps to remedy those wrongs.”<sup>10</sup> In addition, The Draft AI acknowledges it’s importance as well: “Affirmatively Furthering Fair Housing (AFFH) requires that federal grantees further the purposes of the Fair Housing Act through the provision of an effective planning approach to aid program participants in taking meaningful actions to *overcome historic patterns of segregation*, promote fair housing choice, and foster inclusive communities that are free from discrimination.”<sup>11</sup> However, the Draft AI does not follow this recommendation and identifies little to no explicit government policies or private action on a State level or regional level which contributed to segregation or inequities in fair housing choice. If the Draft AI does not address how historical government or private action created these current impediments, the Draft will be weak in overcoming these barriers to fair housing choice.

While the Draft AI analyzes the statistics of the current status of integration/segregation in the region by zip code,<sup>12</sup> the Draft AI fails to document the origin of the current injustices. The communities in the Alliance are not just statistics- the group is made up families and people impacted by these policies. Each member of the Alliance and the neighborhood associations are personally effected by this history. Segregation, bank disinvestment, environmental hazards, redlining, displacement, urban renewal effects, lack of public transit, and other institutionally created policies together created the current barriers to fair housing choice. Only analyzing zip code statistics will not give a full picture of how communities arrived in this unjust position, and will also not provide a viable option to overcome the impediments. Quantitative statistics alone do not occur in a vacuum, but carry a legacy of systemic discrimination: the current analysis is incomplete without putting these numbers in their historic context.

The statistics listed in Region 1 do identify Alliance neighborhoods of Dunbar Manhattan and Chatman Hill as Racially/Ethnically Concentrated Areas of Poverty.<sup>13</sup> However, the Region 1 analysis does not identify how many East Lubbock fair housing choice barriers were a creation of private and government unjust action. The City of Lubbock and private companies isolated black communities in East Lubbock by utilizing industrial zoning as a segregation tool, which will not

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<sup>9</sup> *Id.* at 816.

<sup>10</sup> *Id.* at 816. (emphasis added)

<sup>11</sup> *Id.* at 436.

<sup>12</sup> *Id.* at 96-98.

<sup>13</sup> *Id.* at 96.

reflect in the analysis of just zip codes.<sup>14</sup> Currently, those industrial uses which began through segregation in 1923 are largely still adjacent to residences causing major health issues and disinvestment.<sup>15</sup> The current zoning plan in Lubbock still concentrates industrial zoning in historically African American and Hispanic neighborhoods.<sup>16</sup> TDHCA attempts to address this issue in a small singular way by creating a rule to no longer place multi-person living facilities by industry.<sup>17</sup> However, TDHCA has no systemic analysis on how this historical practice of industrial use as a segregation tool still affects fair housing choice today. Furthermore, the Draft AI provides little regional coordination with TDHCA in actually applying the state recommendations to overcoming these systemic injustices. The lack of this type of analysis and direction will leave TDHCA analyzing at the same impediments and recommendations again in another six years.

The Alliance believes historical documentation and knowledge is powerful and can give a community an understanding of the past and a direction for the future. Over the last year, the Alliance led numerous neighborhood association meetings that allowed their communities to learn about the history of systemic discrimination throughout East Lubbock. The community was then able to see that present issues of discrimination and impediments were caused by a history of segregation, bank disinvestment, environmental hazards placement, redlining, displacement, inequities in infrastructure funding, urban renewal effects, and lack of public transit.

Today these inequities leave East Lubbock with a lack of employment in the community, no efficient public transit, lack of access to grocery stores and medical access, lack of access to mortgages and financing, health issues from living by industrial use, and lack of bank access to housing loans. The knowledge of the past and present policies gave the Alliance the ability to actively engage with current policy, in the Lubbock 2040 Comprehensive Plan, and find current policies and options to overcome these historical barriers in the community. The discussion, research, and solutions began with an understanding and documentation of historical discrimination. A culmination of much of this research is listed as an appendix to serve as an example of how TDHCA can incorporate historical documentation of fair housing choice impediments into the Draft AI.<sup>18</sup> The Alliance understands TDHCA cannot list the entire history of each region, however, the Alliance encourages the Draft AI to include some history in each section discussing how fair housing choice barriers began. This documentation of history will allow the State identify specific solutions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

### **3. Address the barrier of public transportation by increasing mobility through coordination with TxDOT and the local region.**

Public transportation is a major barrier to fair housing choice and mobility throughout Texas, especially in Region 1. The Draft AI acknowledges this problem in Impediments #1 and #5 by addressing the inability to live in certain regions without public transit and the importance of general mobility throughout a region. Recommendation #1 then prioritizes housing choice by encouraging “development in high opportunity areas and encouraging creative, innovative

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<sup>14</sup> Appendix C

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> Texas Department of Housing and Community Affairs, Draft State of Texas Analysis of Impediments to Fair Housing Choice (Mar. 25, 2019, Draft Version for Public Review) 820, available at <https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-DRAFT.pdf>.

<sup>18</sup> Appendix C

solutions.”<sup>19</sup> The Draft AI also acknowledges “[w]hen households rely significantly on public transportation, this can have an impact on where the household may choose to live.”<sup>20</sup> Throughout all clusters of public housing surveyed in Texas, (including categories of general, with disabilities, and children present) all ranked Transportation Services as the highest necessity of all.<sup>21</sup> Housing choice for those without a vehicle is unquestionably linked to public transit access.

Public transportation affords low-income communities access to their basic needs including grocery stores, health care providers, and employment opportunities. The tenant survey in Figure I-2 quantifies the importance of public transit in the “importance of neighborhood features.”<sup>22</sup> Tenants in TDHCA funded properties emphasized being near a grocery store and pharmacy, health care providers, new employment opportunities, and public transportation as top priorities. However, Lubbock’s major lack of public transit coverage and efficiency leave many people, especially the African American community, stranded from these basic needs and unable to have fair housing choice. Nearly half of the LITHC properties are outside a half mile range of the public transit service area in Lubbock.<sup>23</sup>

In order to achieve equity and fair housing choice, Lubbock needs State coordination to help increase mobility through public transit. Lubbock currently has a dismal public transit score of 22 out of 100 (minimal).<sup>24</sup> The City of Lubbock acknowledged, “Lubbock is generally car-dependent and most errands require a car.”<sup>25</sup> These errands often include access to basic needs such as housing, medical care, jobs, and food. Lubbock has a massive area, without ready access to grocery stores or any public transit at all.<sup>26</sup> These barriers are growing as the system has worsened over the last decade. Not only has route access worsened, but the growth of Lubbock has expanded far from the existing public transit service area. The efficiency of transit in East Lubbock has worsened as well. One-way commute times across Lubbock can range from an 1.5 to 2.5 hours.<sup>27</sup> The route running to Lubbock Estacado High School and an important new housing development in East Lubbock, Kings Dominion, runs less frequently than even seven years ago.<sup>28</sup> There is little to no access to the Southwest part of Lubbock where most housing and job growth occurs. Several neighborhoods including Yellowhouse Canyon (a neighborhood association in the Alliance) and new areas of the City in the Cooper and Frenship School Districts have no access to public transit.<sup>29</sup> Even South Plains Food Bank, the major food bank in Lubbock, has no consistent access to public transit. The bus system does not run on Sundays and has limited options after 7 p.m. on Mondays through Saturdays.<sup>30</sup> This makes relying on transportation extremely difficult for those working outside of a normal business schedule. Texas Tech’s comprehensive transit study of Lubbock in 2015 found that Citibus was “not viable to other parts of the city.”<sup>31</sup> Of those polled in the study, 78% stated that public transit did not provide accessibility to areas outside of Texas

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<sup>19</sup> Texas Department of Housing and Community Affairs, Draft State of Texas Analysis of Impediments to Fair Housing Choice (Mar. 25, 2019, Draft Version for Public Review) 6, available at <https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-DRAFT.pdf>.

<sup>20</sup> *Id.* at 57.

<sup>21</sup> *Id.* at 588-590.

<sup>22</sup> *Id.* at 587.

<sup>23</sup> Appendix A

<sup>24</sup> City of Lubbock, 2040 Comprehensive Plan (Dec. 17, 2018) 84, available at <https://ci.lubbock.tx.us/storage/images/qLXKeIyOZxc7Ke4ByQxiYk8ropy5RPZOoTvyEqC2.pdf>.

<sup>25</sup> *Id.*

<sup>26</sup> Appendix A

<sup>27</sup> *Fixed Route Map*, CITIBUS (Jan. 2017), <http://www.citibus.com/cms-assets/documents/266016-318014.2017fixedroutefinalcompressed.pdf>.

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> TEXAS TECH UNIV., *Transit Master Plan*, SRF (June 2015), <https://www.depts.ttu.edu/parking/PDFsandDocuments/TransportationMasterPlanExecutiveSummary.pdf>.



Tech.<sup>32</sup> These transit problems are proof of a flawed system. The City of Lubbock identified problems and researched some solutions, but it has failed to prioritize funding and research for over a decade. The Alliance urges the TDHCA to address this major barrier to mobility and fair housing choice, especially for transit-dependent populations, by incorporating regional public transit planning into the Draft AI.

The Draft AI not only lacks proper transit analysis in Region 1, but also gives the wrong impression that transit is not a major barrier in Region 1 and Lubbock. Region 1 analysis reports the “majority of job holders working in Region 1 live within 10 miles of their work” and even states that “there is a high degree of mobility in and out of counties in Region 1.”<sup>33</sup> Finally, the report says “individuals have commutes that are less than 20 minutes.”<sup>34</sup> This report develops a State perspective that those who deal with housing barriers do not have massive mobility and transit barriers, evading blame and responsibility in the local and State level. The Draft AI should correct this issue by including an analysis of public transit barriers regionally, instead of only using statistics from the use of a personal vehicle.

The Draft AI mentions the importance of the Texas Transportation Commission and TxDOT working together alongside TDHCA on various types of public transportation projects to help break down the barrier of mobility issues related to public transportation. Therefore, the Draft AI should create regional solutions to actually work on a project together with either Texas Transportation Commission or TxDOT. Lubbock just received a grant from TxDOT, for a Comprehensive Operational Analysis (COA). According to the TxDOT local representative currently working on the project, he is not aware of TDHCA coordination or input on the analysis. TDHCA giving TxDOT insight into fair housing choice issues related to public transit could help this COA project to potentially improve Lubbock public transit and help achieve further mobility for distressed communities.

Finally, a new analysis addresses establishing public housing properties in growing areas by incentivizing “developments applying for Housing Tax Credits to locate near public transportation or to provide on-demand transportation.”<sup>35</sup> While this is a good idea in theory, if a city is not expanding public transit into developing areas, the analysis will prevent almost any tax credit properties from being set up in developing communities as it will not pass the point system. This will actually discourage fair housing choice in high opportunity areas, the antithesis of the Draft AI recommendations. TDHCA has established LITHC properties in Lubbock before the new analysis, but almost half of these locations have no access to public transportation within a half mile.<sup>36</sup> The Draft AI must address these types of specific regional barriers by coordinating and participating in regional public transit projects when possible.

#### **4. Address the lack of participation in TDHCA programs that assist low-income families in purchasing homes.**

The State AI shows the participation in housing assistance programs by low-income individuals throughout the state. Across the board, utilization of these programs by low-income Lubbockites is far below the state average. Of the TDHCA administered Home Buyers Assistance program and Tenant Based Rental Assistance program, less than 30 households in Lubbock County

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<sup>32</sup> *Id.*

<sup>33</sup> Texas Department of Housing and Community Affairs, Draft State of Texas Analysis of Impediments to Fair Housing Choice (Mar. 25, 2019, Draft Version for Public Review) 103, available at <https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-DRAFT.pdf>.

<sup>34</sup> *Id.*

<sup>35</sup> *Id.* at 58.

<sup>36</sup> Appendix A

participated in either program between 2013 and 2017.<sup>37</sup>

Similarly, more should be done to help households utilize the Texas Bootstrap Loan Program, a program that promotes loans to low-income households for building or refinancing new or existing residential housing. Again, less than 30 households in Lubbock County utilized this program between 2013 and 2017. Per TDHCA, Lubbock Habitat for Humanity is a certified nonprofit owner-builder housing provider. There needs to be more coordination between TDHCA and the local region in steering low-income residents who may be qualified this and other loan programs. This lack of regional coordination is a widespread problem, not just a Lubbock one. Between 2013 to 2017, over 1.4 million households qualified for this program, with only 515 households participating.<sup>38</sup>

Participation was better in My First Texas Home Program in Lubbock, but still lacking behind many other comparable counties and a small fraction of potential eligible households. For this down payment and interest rate assistance program, 54 households utilized this program in Lubbock County between 2013 and 2017.<sup>39</sup> Of these 54 households, a disproportionate number were either of Hispanic or white ethnicity, with only 1 household being identified as black or African American.<sup>40</sup> More must be done to address why this program does not reach the black/African American community. TDHCA should encourage lenders that offer these program to expand outreach, and approach other lenders to enter the program. TDHCA should also conduct similar outreach to lenders and potential participants under the Texas Mortgage Credit Certificate Program, as again this another program less than 30 Lubbock households from 2013 to 2017 utilized.

The Draft AI should include a detailed plan for better educating the community on resources available to help alleviate housing problems for lower income households. Likewise, TDHCA should make more effective efforts to reach out to private lenders regarding programs they may be able to offer to lower income households.

## **5. Address the lack of private lending to individuals in lower income areas.**

TDHCA must do more to address Impediment #3, obstacles in accessing homeownership and lending products. A clear barrier to lending products is the lack of access to banking institutions. This issue is very evident in the 4 neighborhoods that make up the Alliance where 3 of the 4 neighborhoods contain no bank or even mobile banking locations. Chatman Hill and Dunbar-Manhattan Heights are in census tract 12 of Lubbock with a majority of the census tract being black/African-American and 30.6% of the population living below the poverty line.<sup>41</sup> Similarly, in census tract 9 and 10, with poverty rates at 33.5% and 29.6% respectively, and both census tracts being majority black/African-American, there is a single mobile banking location, a soon-to-close Wells Fargo branch located in a supermarket, and no brick-and-mortar standalone bank.<sup>42</sup> Per HMDA data, these same neighborhoods received a combined than 0.1% of all FHA dollars loaned out in Lubbock County in 2016.<sup>43</sup> In that same year, these 3 census tracts received approximately \$467,000 in conventional mortgage loans, less than 1/10 of 1% of the \$537 million dollars in conventional mortgages throughout the county.<sup>44</sup> Following that pattern, these 3 census tracts

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<sup>37</sup> Texas Department of Housing and Community Affairs, Draft State of Texas Analysis of Impediments to Fair Housing Choice (Mar. 25, 2019, Draft Version for Public Review) 356, available at <https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-DRAFT.pdf>.

<sup>38</sup> *Id.* at 361.

<sup>39</sup> *Id.* at 362.

<sup>40</sup> *Id.*

<sup>41</sup> U.S. Census Bureau, American Community Survey 2017 5-year estimate, table S1701

<sup>42</sup> *Id.*

<sup>43</sup> Appendix B

<sup>44</sup> *Id.*

received only \$112,000 in home improvement loans, 0.46% of the \$24,338,000 loaned for the entire county.<sup>45</sup> These 3 census tracts, making up over 3.5% of Lubbock County, account for only 1/10 of 1% of all home lending activity.<sup>46</sup> The three mentioned tracts are the most striking, but this problem is evident in other lower income areas throughout Texas and the United States.<sup>47</sup> TDHCA must work on a regional plan to address this lack of FHA loans in historically disinvested communities to improve access in equitable and fair housing choice.

Thank you for considering these recommendations. If you would like to discuss this further, please contact us.

Regards,

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<sup>45</sup> *Id.*






<sup>46</sup> *Id.*

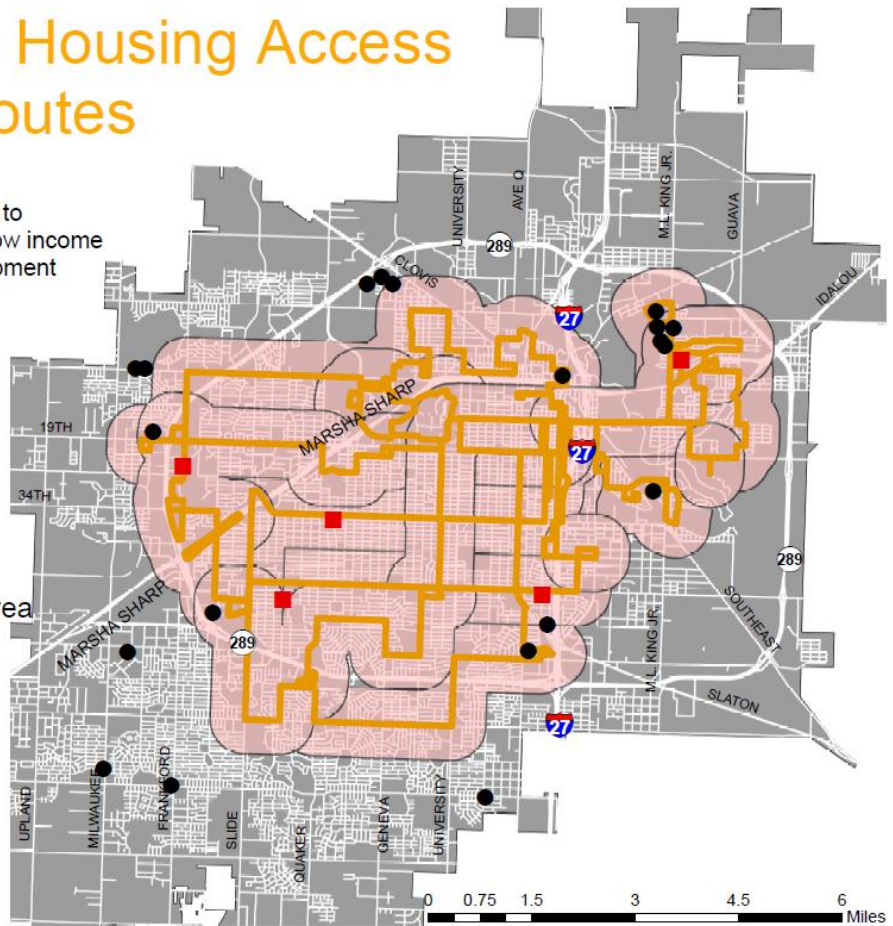
<sup>47</sup> *Id.*

# Appendix A

## Low-Income Housing Access to CitiBus Routes

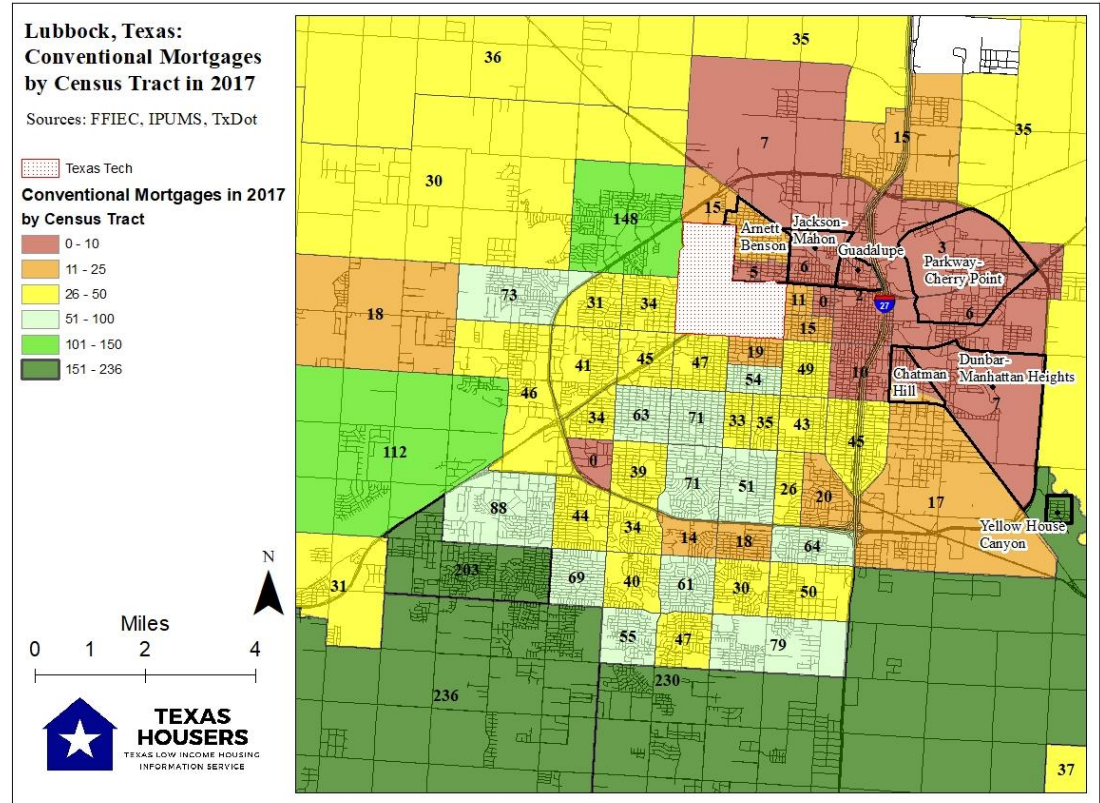
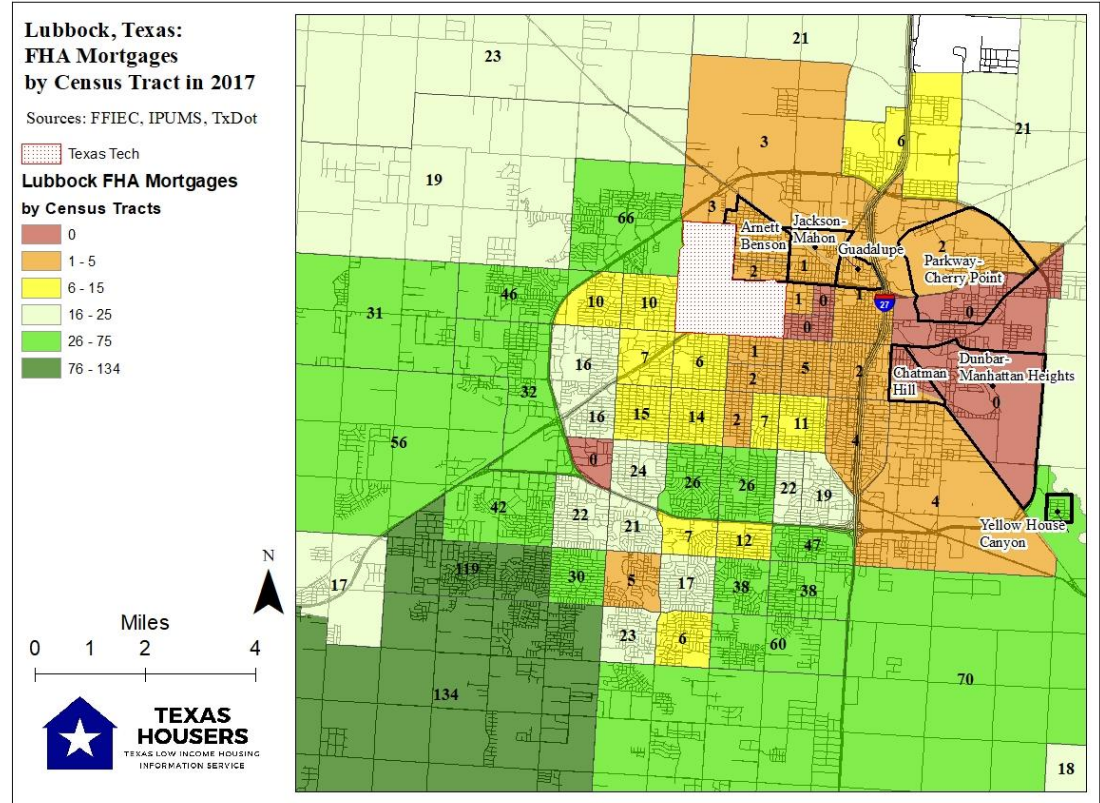
LIHTC Properties refers to properties that have received low income tax credits for their development

-  N  
W E  
S
-  Public Housing
-  LIHTC Housing
-  CitiBus Routes
-  CitiBus Service Area



<sup>48</sup> Texas Department of Housing and Community Affairs, Housing Tax Credits (Feb. 21, 2019) available at <https://www.tdhca.state.tx.us/multifamily/housing-tax-credits-9pct/>.

# Appendix B



## Appendix C

### Regional Historical Analysis of Government and Private Policy: Lubbock

Early in Lubbock's history, the city confined African Americans in the east side and built industry around their communities (and purposefully created disinvestment). In 1920, the Lubbock Avalanche published an editorial calling on the city to regulate where black Lubbockites could live.<sup>49</sup> Three years later, in 1923, the Lubbock City Council created Ordinance 223, which prohibited African Americans from owning or renting property anywhere outside of the area south of 16<sup>th</sup> Street and east of Avenue C, excepting *bona fide* servant's quarters.<sup>50</sup> The ordinance justified itself with barefaced racism, claiming that African-American residents were "dangerous to the health" and environmentally hazardous to whites.<sup>51</sup> Although the ordinance was never read into law, it was signed by the mayor and achieved the desired result—by 1940, all African-American births in Lubbock occurred within the boundaries prescribed by the ordinance.<sup>52</sup> Even as late as 1960, 93.8% of Lubbock's black population lived within the confines (see Figure 4 below). (CITE)

Segregation was also enforced through private action.<sup>53</sup> White developers and citizens carried out the spirit of the ordinance by incorporating deed restrictions that prohibited property owners from selling to people of color. And even though the Supreme Court ruled racial zoning laws unconstitutional in 1917,<sup>54</sup> the City of Lubbock found new ways to use its zoning power to further segregation. In Lubbock's first comprehensive plan, published in 1943, city planners created industrial buffer zones separating communities of color from the rest of the city. (CITE) The 1943 comprehensive plan was openly discriminatory,<sup>55</sup> reserving the east and north sides for

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<sup>49</sup> Robert Foster, *Black Lubbock: A History of Negroes in Lubbock, Texas, to 1940* 47 (Dec. 1974) (unpublished M.A. thesis, Texas Tech University) (quoting *Lubbock Avalanche* (Feb. 5, 1920)) ("In all probability the time has come when our city must designate a certain portion of the city for these people [African Americans] to build their home and live separate and apart from the balance of us. People are not going to stand for negro neighbors, and if there is not regulation made by the proper authorities there is liable to be regulations of a private nature, which should be avoided if possible . . .").

<sup>50</sup> *Id.* at 109.

<sup>51</sup> *Id.* at 110 (quoting from Ordinance 223 Section 4) ("The fact that negroes and persons of African descent and persons containing as much as one-eighth negro blood are residing in various portions of this city and **their residents is dangerous to the health and pollutes the earth and atmosphere, creates an emergency** and necessity that the removal of the charter requiring an ordinance to be read at two several meetings be suspended and this ordinance been acted at the meeting of its introduction and effective upon publication.").

<sup>52</sup> James R. Henley Jr. & Charles K. Edgley, *Population Change by Ecological Areas in East Lubbock (1960–1965)* (on file with Texas Tech University, Southwest Collections).

<sup>53</sup> Jason Michael Post, *Spatial Environmental Inequality in Lubbock, Texas* 5 (May 2014) (unpublished M.S. thesis, Texas Tech University) <https://ttu-ir.tdl.org/ttu-ir/handle/2346/58599>.

<sup>54</sup> The Lubbock ordinance was assuredly unconstitutional when it was written. The Supreme Court struck down a similar ordinance in Louisville, Kentucky in *Buchanan v. Warley*. 245 U.S. 60 (1917).

<sup>55</sup> Cynthia L. Sorrensen, Perry L. Carter & Jack Phelps, *Urban landscape as mirror of ethnicity: trees of the South Plains*, *URBAN GEOGRAPHY* 36:7, 1042–63 (July 2, 2015), <https://doi.org/10.1080/02723638.2015.1039397> ("Discriminatory thinking behind annexation was blatantly demonstrated in the 1943 city plan of Lubbock. Eastside property that extended from industrial areas was deemed 'not appropriate' for White residences. Black and Latino residential landscapes were not seen in a similar vein, and instead were deemed 'appropriate' for the eastside and its exposures to industry. This became even more clear in 1953 when the Southeast Lubbock Development Board (SLDB) was established for the sole purpose of developing eastside residential zones for Black residences. The mission of the board aligned with the urban blight/annexation discourse and worked to alleviate hazardous conditions within already-existing slum areas, which had supposedly resulted from overcrowding. It also encouraged the relocation of historic Black communities to newer developments on the eastside. **In essence, Black and Latino residential landscapes were not really residential in the minds of city planners; these landscapes were instead understood as extensions of industrial landscapes where labor lived and worked.**" (Emphasis added.)).

Black and Hispanic neighborhoods and industrial uses:

The area to the East and to the North of the present business district has been preempted by the Santa Fe Railroad right-of-way tracks and yards. Immediately beyond this industrial area the attendant development is principally for Negro and Mexican families. This [cannot] be considered as desirable potential property for white residential development excepting probably the area on the heights to the East of the Mackenzie State Park. The prospective developments to the East and North, then, under such circumstances could not be expected to encourage the extension of the central business district in those directions.<sup>56</sup>

In 1943, most of the Lubbock's black population lived in the "Flats," the "Wheelock Addition" (present-day Chatman Hill), the Seiber Second Additions, and unincorporated areas outside of the city limits. Wheelock was surrounded by industry and the railroad (see Figure 5 below).<sup>57</sup> Its western border was the Santa Fe railroad, zoned "M" for manufacturing. To the south, a strip of land was zoned L for manufacturing. To the east, separating the black community from downtown, lay six blocks of railroad tracks and land zoned F, J, and L for industry and manufacturing.<sup>58</sup> The Seiber Second Additions were immediately south of Wheelock and the city limits line. This land would be annexed by the city during urban renewal—a portion was zoned residential and incorporated into Chatman Hill and Manhattan Heights. The area south of present day Coronado Drive would become industrial.

**Figure 5: 1943 Plan Zoning Districts<sup>59</sup>**

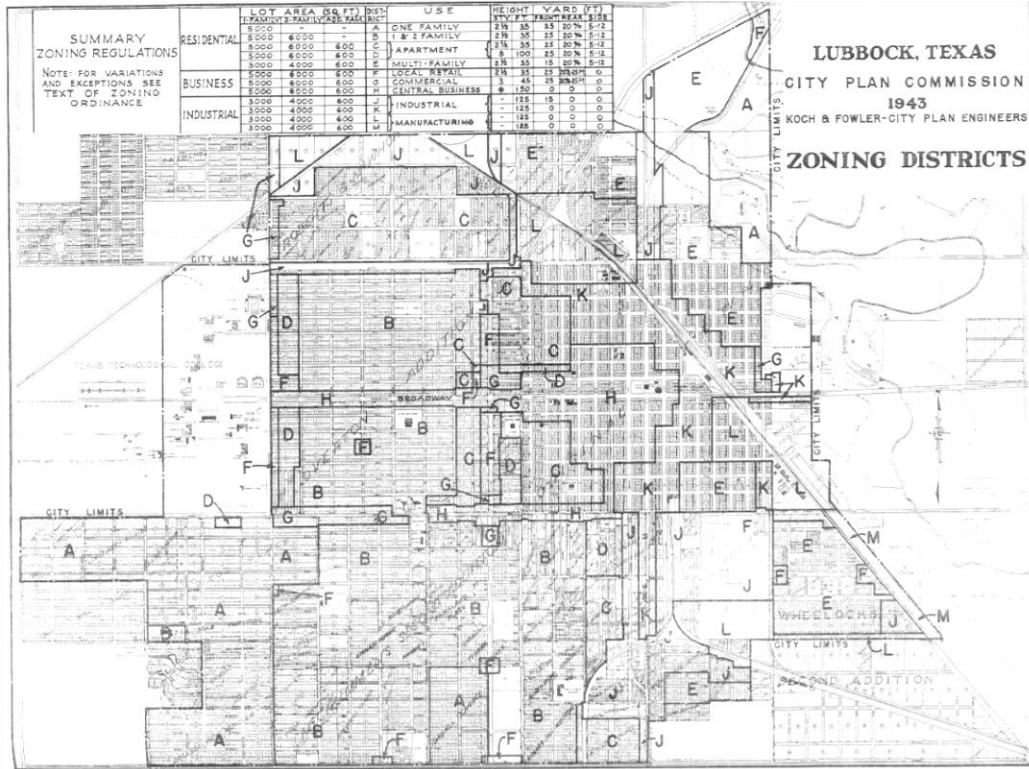
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<sup>56</sup> CITY OF LUBBOCK, TEXAS PLANNING, *The City Plan of Lubbock Texas* (1943), <https://www.ci.lubbock.tx.us/departamental-websites/departments/planning/lubbock-s-past-and-future/comprehensive-plans>.

<sup>57</sup> *Id.*

<sup>58</sup> *Id.* at 46; see also Post, *supra* note 11, at 8.

<sup>59</sup> CITY OF LUBBOCK, TEXAS PLANNING, *Lubbock Comprehensive Land Use Plan* (1943).



Lubbock’s 1959 comprehensive plan perpetuated the discriminatory practices of the city’s 1943 comprehensive plan. Almost 40 years had gone by since the creation of Ordinance 223, but nearly 94% of Lubbock’s black population still lived within the confines it set (see Figure 4 above). The 1959 comprehensive plan continued to concentrate industrial zoning around the African-American community, cementing the environmental racism of surrounding Chatman Hill with pollution and expanding industrial zoning in newly annexed land in the southeast.<sup>60</sup> Ironically, the 1959 comprehensive plan stated that the ideal neighborhood should be “free from the noxious odors, sounds and sights of industry.”<sup>61</sup> Heavy industries, it stated, “are known to emit smoke, dust, odor, or noise, or are hazardous by nature.”<sup>62</sup> The plan made much of a southwestern prevailing breeze as a reason to locate industry in the northern and southeastern parts of the city because the wind would carry noxious fumes away from residential areas.<sup>63</sup> But no thought was devoted to the existing and proposed black neighborhoods on the east side, which were already surrounded by industry.<sup>64</sup>

**Figure 6: Proposed Zoning from 1959 City of Lubbock Plan<sup>65</sup>**

<sup>60</sup> CITY OF LUBBOCK, *Lubbock Comprehensive Plan Land Use Report* (1959), [https://www.ci.lubbock.tx.us/docs/default-source/planning-file-library/1959-plan.pdf?sfvrsn=f7809bc8\\_4](https://www.ci.lubbock.tx.us/docs/default-source/planning-file-library/1959-plan.pdf?sfvrsn=f7809bc8_4).

<sup>61</sup> *Id.* at x.

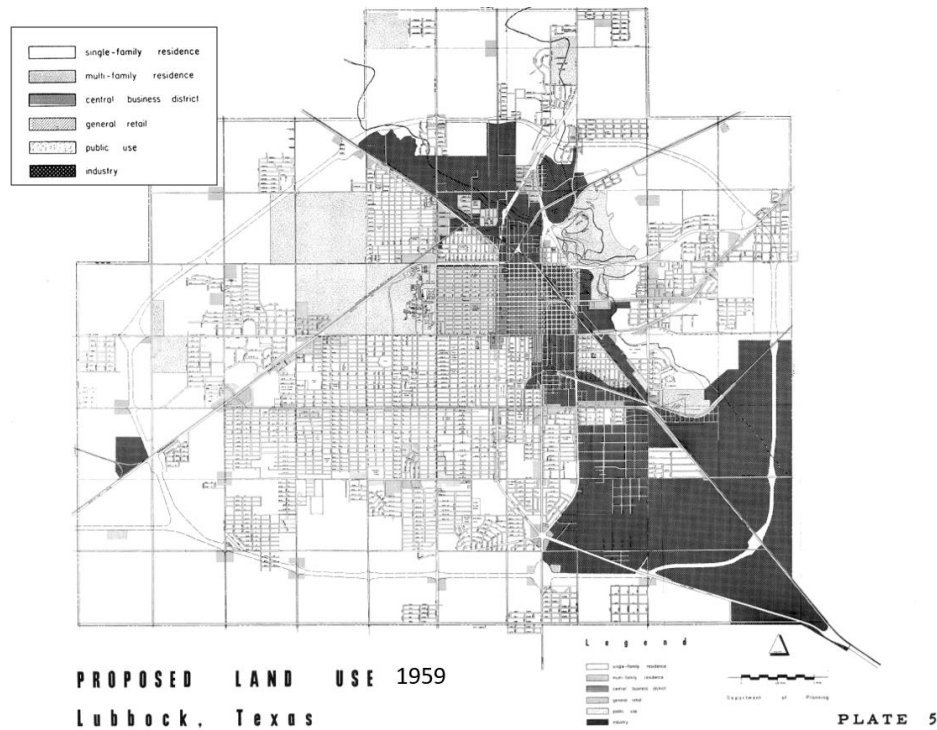
<sup>62</sup> *Id.* at 6.

<sup>63</sup> *Id.* at 16.

<sup>64</sup> Cynthia L. Sorrensen, Perry L. Carter & Jack Phelps, *Urban landscape as mirror of ethnicity: trees of the South Plains*, *URBAN GEOGRAPHY* 36:7, 1048 (July 2, 2015), <https://doi.org/10.1080/02723638.2015.1039397>.

<sup>65</sup> *Lubbock Comprehensive Plan Land Use Report* (1959).





Concurrent with the 1959 planning effort, Lubbock also began the process of urban renewal. The Housing Act of 1949 provided federal funds to cities to combat blight in urban areas. Cities could use the funds to tear down and relocate “blighted” communities under the auspice of health and safety.<sup>66</sup> Urban renewal left no part of Lubbock’s black community untouched. During the “Coronado Project,” The Lubbock Urban Renewal Agency acquired and demolished almost all the homes in present day Chatman Hill and attempted to relocate the inhabitants to new subdivisions designed specifically for African Americans.<sup>67</sup> These subdivisions included Manhattan Heights, which was developed for “Negro occupancy since the initial planning for the Coronado Project came into being.”<sup>68</sup> In an interview in 1969, J.D. Hassell, a member of Lubbock’s first planning and zoning board acknowledged urban renewal was meant to keep blacks separated from whites. Segregation, he said, “was perfectly natural and logical at that time.”<sup>69</sup> While Urban Renewal Agency policies continued to confine African Americans to the east side, city planners continued the expansion of industrial zoning in the same area.

In 1986, Lubbock published a new comprehensive plan. In the years since 1959, the racial makeup of the east and north sides changed substantially. The Arnett Benson and Jackson Mahon neighborhoods became majority Hispanic. The Parkway and Cherry Point neighborhoods, in the northwest quadrant of the city, changed from majority white in 1960 to majority African American and Hispanic by 1980 (see Figure 7 and Figure 8 below). After the demographics had changed, the 1986 comprehensive plan proposed major expansions of industrial zoning in these areas. The

<sup>66</sup> *Id.*

<sup>67</sup> John Overton Burford, *The Development of the Coronado Urban Renewal Project 48–49* (1966) (unpublished MBA thesis, Texas Tech University) <https://ttu-ir.tdl.org/ttu-ir/handle/2346/13637?locale-attribute=es>.

<sup>68</sup> Letter from H.O. Alderson, Executive Director of Urban Renewal Agency of City of Lubbock (Jan. 15, 1960) (on file with Texas Tech University, Southwest Collections).

<sup>69</sup> Interview with J.D. Hassell by Alice Johnson (Jan. 11, 1972) (On file with Texas Tech University, Southwest Collections).

Interviewer: “Now you had the Manhattan Project [sic] come up during the time you were on. Now this was particularly for the blacks.

Hassell: “That’s right.”

Interviewer: “Now as this a city plan to keep them over there?”

Hassell: I can only offer my opinion on that and I think it was. It was perfectly natural and logical at that time.”

change essentially blocked the expansion for these now majority minority neighborhoods outside of their existing boundaries and limited the possibility of future residential development.<sup>70</sup> Shortly following this publication of the 1986 comprehensive plan, the final portion of Interstate 27 was constructed along the old Avenue C corridor. Although nearly 70 years had passed since Ordinance 223, the highway served as a physical reminder of the racist ordinance, having been built along the same barrier the old ordinance had prescribed. The land use patterns finalized in the 1986 comprehensive plan, coupled with the construction of I-27, have influenced the growth of Lubbock for the last 30 years. The expansion of industrial land use in East and North Lubbock near communities of color, and the construction of I-27, which effectively severed East Lubbock from the rest of the city, perpetuated the discriminatory impact of past City plans.

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<sup>70</sup> CITY OF LUBBOCK, *1986 Comprehensive Land Use Plan* (1986), [https://mylubbock.us/docs/default-source/planning-file-library/land-use-plan-1975-1986.pdf?sfvrsn=1f5f98c8\\_](https://mylubbock.us/docs/default-source/planning-file-library/land-use-plan-1975-1986.pdf?sfvrsn=1f5f98c8_)

To: Texas Department of Housing and Community Affairs (TDHCA)  
From: Christa Walikonis, Policy Fellow  
Date: May 6, 2019  
Re: Draft State of Texas Analysis of Impediments to Fair Housing Choice

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Thank you for the opportunity to provide comments on the Draft State of Texas Analysis of Impediments to Fair Housing Choice.

We appreciate the inclusion of the impediments faced by persons with disabilities in this document, and fully agree with your conclusion that the scarcity of accessible and visitable housing units limits fair housing choice. Your representation of disability issues made good use of the most recent data, and you made clear the connection between disability and poverty, and their combined effects on finding housing. We were happy to see that our comments on service animals were addressed, and we support your recommendation to increase training on service animal laws and regulations with regards to fair housing. We do, however, have two additional issues we would like to see addressed in the document:

First, while the draft goes into detail regarding the causes and effects of NIMBYism, the impact of state representative letters and local government input on Low-Income Housing Tax Credit (LIHTC) projects is absent from the discussion. Representative letters can either add or reduce a project's point count by 8 and 17 respectively, giving a letter or resolution of opposition the power to kill a project completely. Our research finds that proposed affordable housing projects in areas of opportunity rarely make it past the pre-application phase because of the scoring provisions associated with this input, limiting the availability housing options for people with disabilities. In addition, the application process provides for points for input from community organizations that can also impact NIMBYism.

Second, we did not see any discussion of landlord discrimination against individuals based on their source of income. One-third of Section 8 Housing Choice Voucher (HCV) holders in Texas are individuals with a disability. Currently, landlords in the State of Texas can refuse to rent to someone who wants to pay with a HCV. Our research over the last couple of years shows that people with disabilities are unable to find a landlord that will accept their HCV, adding yet another barrier to finding affordable housing.

We recommend these two additional points be discussed in the State of Texas Analysis of Impediments to Fair Housing Choice with a path forward to address these barriers. Thank you again for the opportunity to provide these comments on behalf of Disability Rights Texas. For more information, please contact me at [cwalikonis@drtx.org](mailto:cwalikonis@drtx.org).



May 6, 2019

Texas Department of Housing and Community Affairs  
P.O. Box 13941  
Austin, TX 78711-3941  
Attn: Ms. Cate Tracz via email to: [cate.tracz@tdhca.state.tx.us](mailto:cate.tracz@tdhca.state.tx.us)

RE: Comments on Draft Analysis of Impediments to Fair Housing

Dear Ms. Tracz:

The Inclusive Communities Project (ICP) is a not-for-profit organization that works for the creation and maintenance of thriving racially and economically inclusive communities, expansion of fair and affordable housing opportunities for low-income families, and redress for policies and practices that perpetuate the harmful effects of discrimination and segregation. ICP writes to affirm comments made on April 18, 2019 at TDHCA's public hearing in Dallas, TX about the state's draft Analysis of Impediments (AI) to Fair Housing.

The AI should be more specific about the challenges and opportunities the state has to affirmatively further fair housing as it relates to race and ethnicity. All data presented in the report should include analyses by race and ethnicity when available. Detailed steps to neutralize and/or eliminate policies or practices that steer families to segregated high poverty neighborhoods should be included in the report. Policies and practices that open housing to protected-class members, such as blacks and Latinx populations who have historically been discriminated against, which need to be created, funded and enforced should also be included.

The AI should evaluate the impact of all state agencies and other governmental agencies, which impede or could enhance the state's ability to affirmatively further fair housing. The TCEQ is one example. Black and Latinx residents in the City of Dallas too often and for too long have had to live in or near industrial activity that impacts their health. Siting and rehab decisions through the LIHTC process have played a big role in exposing children to toxins emitted from this type of activity. But homeowners of color in the City of Dallas also bear the brunt of this environmental injustice in ways non-Hispanic whites do not. The TCEQ must better evaluate the impact of this industrial activity on residential homes while making these evaluations publically available and user friendly. Environmental injustice is a fair housing issue that keeps persons from the quiet and safe enjoyment of their homes.

Activities of the North Central Texas Council of Governments (NCTCOG) plays a role in housing as well. NCTCOG uses its funds for infrastructure and other purposes that facilitate housing, often in segregated high poverty areas. It has not been seen as doing so in non-segregated areas where such activity is used to open housing for lower income people of color. The NCTCOG could also better play a role in addressing environmental injustice matters as they related to housing and the lived experience of many people of color in the City Dallas.

Sincerely,

  
Demetria L. McCain, President  
[dmccain@inclusivecommunities.net](mailto:dmccain@inclusivecommunities.net)

CC: Nicole Rolfe, Mobility Assistance Program Director, ICP  
Jennifer Rangel, Director of Planning & Community Outreach, ICP

**Inclusive Communities Project**

3301 Elm Street, Dallas, Texas 75226 \* office 214.939.9239 \* fax 214.939.9229 \* [www.inclusivecommunities.net](http://www.inclusivecommunities.net)

**Public Comment:**

**Jason Howell, MBA, PRS**

RecoveryPeople

Jason.Howell@RecoveryPeople.org

**RE: Draft State of Texas Analysis of Impediments to Fair Housing Choice (AI)**

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Thank you for this opportunity to provide comment. My name is Jason Howell. I am a persons in long-term recovery from mental health conditions and substance use issues, which is why I am so passionate about fair housing choice.

I have several concerns about the current Draft State of Texas Analysis of Impediments to Fair Housing Choice (AI). I have highlighted them below along with recommended solutions.

1.	<b>The report perpetuates confusion and related discrimination around who is a FHAA-protected person by not explicitly including the civil rights definition of “disabled”. To address this issue, the following should be added to the report:</b>
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With regards to federal Fair Housing Amendments Act of 1988 (FHAA), Section 504 of the Rehabilitation Act of 1973 (Section 504) and Title II of the Americans With Disabilities Act (ADA or Title II), a person with a “handicap” or “disability” is defined as someone with a physical or mental impairment that substantially limits one or more major life activities; or who has a record of having such an impairment; or who is regarded as having such an impairment.

As used in this definition:

**A. Physical or mental impairment** includes:

- Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine; or
- Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term physical or mental impairment includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart

**Note:** This definition is broader than the definition used to qualify for Social Security disability benefits, so a person may be protected under the FHA but still not be eligible for disability or supplemental security income (SSI). The definition also means that, even if you do not now have a disability, you are protected if you are treated differently because you have a history of mental or physical disability or because someone believes you have a disability.

disease, diabetes, Human Immunodeficiency Virus infection, mental retardation, emotional illness, drug addiction (other than addiction caused by current, illegal use of a controlled substance) and alcoholism.

- B. **Major life activities** means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.
- C. Has a **record of such an impairment** means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.
- D. Is **regarded as having** an impairment means:
  - Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by another person as constituting such a limitation;
  - Has a physical or mental impairment that substantially limits one or more major life activities only as a result of the attitudes of other toward such impairment; or
  - Has none of the impairments defined in paragraph (a) of this definition but is treated by another person as having such an impairment.

2.	<b>The report minimizes the number of persons with disabilities protected under FHAA by highlighting American Community Survey data and categories, without noting the results are based on a narrower definition of “disabled”. To address this issue, the following should be added to the report:</b>
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The total number of persons with disabilities is unknown, but according to the American Community Survey, which uses a more narrow definition of “disability”, There are more than three million Texans with a disability (11.6% of the total non-institutionalized state population)...

Using American Community Survey data, Figure 2-10 highlights some subpopulations within the large community of person with disabilities.

3.	<b>While the report includes the prevalence of adults who are dependent on or abused an illicit drug or alcohol in the past year, it fails to include the number of persons who are in recovery. To address this issue, the following should be added to the report under the section: Special Needs Populations Data / Persons with Substance Use Disorders</b>
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Whereas National Survey on Drug Use and Health (NSDUH) identifies individuals who qualify for treatment services, another 10% of adults identify as being in recovery (Facing Addiction: Surgeon General’s Report on Alcohol, Drugs and Health, 2016.) Safe and stable housing is a supportive dimension of recovery (SAMHSA, 2012)

In addition, consider replacing the sub-heading with “Persons with Disabilities (Substance Use Disorder and Recovery) similar to the previous sub-heading “Persons with Disabilities (Mental, Physical, and Developmental)”. This will help clarify who is a FHHA-protected person.

5.	<b>The report fails to include a known impediment and mischaracterizes the scope and definition of “boarding homes” under Chapter 260. This must be corrected.</b>
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Chapter 260 Boarding Home statute is facially discriminatory because it enables the regulation of housing based on residents FHHA-protected status.

As identified in the previous Analysis of Impediments, the implementation of Chapter 260 Boarding Home ordinances at the local level has caused fair housing discrimination. This issue continues, if not has increased over the last number of years. Since it has not been resolved, the impediment must be added to the current Analysis of Impediments.

The current report states, *“Note, however, that Chapter 260 does not apply to the full range of FHAA-protected persons; it applies to persons with disabilities, but the definition of boarding house would not cover facilities based on family status or recovering alcohol and drug addicts.”*

- This inaccurately minimize the impediment. While some persons in recovery and functionally equivalent families have successfully sued local government for fair housing discrimination caused by Boarding Home ordinances, many other have and continue to experience barriers to housing choice. Granted, these groups should be statutorily excluded from Chapter 260, but currently they are not. Regardless, the impediment is well document and must be included.

"Boarding home facility" means an establishment that furnishes, in one or more buildings, lodging to three or more persons with disabilities or elderly persons who are unrelated to the owner of the establishment by blood or marriage... ( CHAPTER 260. BOARDING HOME FACILITIES)

5.	<b>The report falsely states that “Texas counties would not have the power to exclude boarding homes for groups other than persons with disabilities from residential areas...” This statement inaccurate, misleading and should be deleted.</b>
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Local government has the power to define and maintain the characteristics of neighborhoods as long as they do not violate fair housing law. For example, local government cannot excluding housing from a residential area based on the residents’ protected class status, regardless of Chapter 260.

5.	<b>The report fails to explain why the regulation of Assisted Living Homes under Chapter xx is less likely to cause an impediment, where as the regulation of Boarding Homes under Chapter 260 certainly does.</b>
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Under Chapter 247, "Assisted living facility" means an establishment that:

- A. furnishes, in one or more facilities, food and shelter to four or more persons who are unrelated to the proprietor of the establishment;
- B. Provides: personal care services; or administration of medication by a person licensed or otherwise authorized in this state to administer the medication;
- C. may provide assistance with or supervision of the administration of medication; and
- D. may provide skilled nursing services for the following limited purposes: coordination of resident care with outside home and community support services agencies and other health care professionals; provision or delegation of personal care services and medication administration as described by this subdivision; assessment of residents to determine the care required; and

for periods of time as established by department rule, delivery of temporary skilled nursing treatment for a minor illness, injury, or emergency.

Note, the population housed in Assisted Living Facilities, by statute, need high levels of care. This may be used to justify the need for higher levels of protection via licensure.

In contracts, the population housed in Chapter 260 Boarding Homes are individuals who receive services that do not inherently establish that they need or want a higher level of protection than anyone else in the neighborhood.

Whereas the Boarding Home statute is facially discriminatory because it raise a barrier based on a resident's FHHA-protected statute, the Assisted Living Facility statute focus on a residents needs, regardless of whether they a FHHA-protected person.

it is quite common for states and/or local governments to establish licensing systems for group home operators in order to protect the health and safety of residents with limited abilities to protect themselves

6.	<b>The report loosely uses the term “group home” and makes statements that contradicts HUD and DoJ cautions around regulating group homes. Broad statements that support licensing of all “group homes” should be removed.</b>
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The term “group home” is inconsistently used throughout the document, which makes broad statements around the licensing of “group homes” irresponsible and in some cases, inaccurate. In the *JOINT STATEMENT OF THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AND THE DEPARTMENT OF JUSTICE STATE AND LOCAL LAND USE LAWS AND PRACTICES AND THE APPLICATION OF THE FAIR HOUSING ACT*, the DoJ and HUD clearly raise concerns around local and state governments ability to regulate “group housing” above and beyond other households in the neighborhood.

Fair housing discrimination is determined on a case-by-case basis. For example:

- This relatively specific statement is true, especially if there was clarification that this was referring to Chapter 591 group homes for person with intellectual disabilities.
  - *“While persons with cognitive disabilities are FHAA-protected persons, it is quite common for states and/or local governments to establish licensing systems for group home operators in order to protect the health and safety of residents with such disabilities.”*
- Broad statement are problematic and false.
  - *“Group home licensing systems are not considered to create barriers to fair housing choice for protected classes”*

7.	<b>The report mischaracterized Housing First research and fails to mention barriers to housing choice for persons in recovery from substance use issue. The Housing First claims should be deleted and recovery housing should be added.</b>
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It is important to distinguish the difference between substance use, substance misuse and substance use disorder. Housing First study cited<sup>1</sup> in the report looked at substance use rather than assessing participants for substance use disorder, therefore it is inaccurate to say that persons with substance use disorder living in Housing First did not increase their substance use. programs, which are programs.

In contrast, the report fails to identify recovery housing as an evidence-based model for persons with substance use disorder that improves abstinence, mental health, employment and monthly incomes as well as decrease criminal justice involvement.<sup>2,3</sup>

**Substance use** is the use of substances such as alcohol or illicit drugs.

**Substance misuse** is the use of substances at high doses or in inappropriate situations which can cause health or social problem — immediately or over time (e.g. binge drinking). 61 million people in the United States admitted to binge drinking in the past year and more than 44 million people used an illicit or non-prescribed drug in the past year. The health and social problems from misuse range from low severity and transient to serious, enduring, and costly consequences.

**Substance use disorder (SUD)** is that prolonged, repeated use of substances at high doses and/or high frequencies (quantity/frequency thresholds vary across substances) which carries the problems of substance misuse and a separate, independent, diagnosable illness that significantly impairs health and function and may require special treatment. SUD can range from mild and temporary to severe and chronic. SUD occur when the recurrent use of alcohol and/or drugs causes clinically significant impairment, including health problems, disability, and failure to meet major responsibilities at work, school, or home.

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<sup>1</sup> Padgett, Deborah K, Leyla Gulcur, and Sam Tsemberis. Housing First Services for People Who Are Homeless with Co-Occurring Serious Mental Illness and Substance Abuse. *Research on Social Work Practice*, Vol. 16 No. 1, January 2006.

<sup>2</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2860009/>

<sup>3</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2888149/>



May 6, 2019

Texas Department of Housing and Community Affairs  
Attn: Cate Tracz  
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Austin, TX 78711-394  
Via email: [cate.tracz@tdhca.state.tx.us](mailto:cate.tracz@tdhca.state.tx.us)

Dear Ms. Tracz:

We appreciate the opportunity to comment on the draft State of Texas Analysis of Impediments to Fair Housing Choice (AI).

Our comments focus only on specific sections of the AI, as identified below.

## **I. Executive Summary**

THCHA misstates the core of the obligation to Affirmatively Further Fair Housing (AFFH). Federal Regulation defines AFFH as follows:

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

***housing and urban development.*** 24 C.F.R. §5.152 (emphasis added)<sup>1</sup>

AFFH is not confined to “[e]xpanding housing opportunities”, just as the term “fair housing” is not confined to individual acts of housing discrimination. AFFH encompasses remedying historical disinvestment and discrimination, and addressing structural factors that have deprived protected classes in Texas of access to opportunity and meaningful housing choice, and perpetuated segregation. While two of Texas’s CDBG programs deal extensively with infrastructure and economic development, the impediments identified and recommended actions to address those impediments are almost solely concerned with housing, and largely do not address critical fair housing and civil rights issues like infrastructure disparities, environmental justice, and access to quality schools.<sup>2</sup> The FHPG, to which the State points as guidance, includes “Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage” in its suggested format for an AI. (FHPG at 2-31)

More troubling, however, is the AI’s assertion that the only obligation the State of Texas has to AFFH is “through the efforts of agencies participating in HUD CPD Programs” that the AI need only address impediments “within the control and capacity of the state agencies that administer the CPD funds.” (AI at 5) As 24 C.F.R. §5.152 states, “[t]he duty to affirmatively further fair housing extends to all of a program participant’s activities and programs related to housing and urban development”, not solely those funded and administered by agencies administering HUD housing and community development funding. The HUD Fair Housing Planning Guide (FHPG), which provides HUD’s guidance for AIs, also states that “[a]lthough the grantee’s AFFH obligation arises in connection with the receipt of Federal funding, its AFFH obligation is not restricted to the design and operation of HUD-funded programs at the State or local level.” (FHPG at 1-3) Under the State CDBG program, other HUD programs which provide grants at the state level, and CDBG-DR, the State of Texas is the grantee and program participant, not the agencies to which the state may delegate these funds. *See, e.g.*, 42 U.S.C. §5303; 83 Fed. Reg. 5844 (February 9, 2018).

While we do not dispute the impediments identified in the AI, it is an incomplete list,

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<sup>1</sup> We note that HUD has not withdrawn the AFFH regulation or instructed jurisdictions not to comply with 24 C.F.R. §§5.150 et. seq., it has only instructed grantees to revert to the AI process instead of completing the Assessment of Fair Housing (AFH) process in order to identify barriers to fair housing choice and commit to meaningful actions with which to overcome those barriers.

<sup>2</sup> For these reasons, we recommended that the state use the data provided by HUD which covers these barriers to fair housing choice, and consider using the draft AFH Tool for States as a model for its AI.

and the recommended actions steps to address those impediments, because they are limited to “the ways in which the state agencies with HUD CDP programs will use those resources to address solutions within their control with the CPD funds available”, are entirely inadequate. The list of impediments and recommendations does not even encompass all of the state agencies with HUD CPD funds or how those funds are spent.

For these reasons, the State’s AI is substantially incomplete and may not support its AFFH certification. “Rejection of the certification renders the Consolidated Plan substantially incomplete and constitutes grounds for HUD to disapprove the Consolidated Plan as submitted. A jurisdiction cannot receive its Community Development Block Grants (CDBG), HOME, Emergency Solutions Grants (ESG), or Housing for Persons With AIDs (HOPWA) program grants until the Consolidated Plan is approved.” 83 Fed. Reg. 23928 (May 23, 2019); *see*, 24 C.F.R. §91.500

## **II. Chapter 1: Introduction**

While we appreciate that the four agencies that administer HUD CPD funds collaborated on the 2019 AI, we again note that the AI covers all of the State’s activities related to housing and community development, and should have included a broader range of state agencies.

## **III. Chapter 3: Review of State Laws, Regulations, and Programs**

The Draft AI states that this chapter will focus on “how the state government directly influences the availability of housing through its own programs, and indirectly influences that availability through state level requirements or restrictions on the land use and housing powers of its local governments.” (AI at 38) However, the FHPG clearly states that,

*States must ensure that State-funded jurisdictions comply with their certifications to affirmatively further fair housing. To do so, States should:*

- *Require all State-funded jurisdictions to take actions that promote fair housing choice at the local level and that have measurable results.*
- *Provide guidance and technical assistance to State-funded jurisdictions in conducting an AI (for those jurisdictions where the State has determined that one will be conducted).*
- *Provide guidance and technical assistance to those State-funded jurisdictions that the State has determined do not have to complete an AI;*

*such guidance should include fair housing training and education for citizens as well as ensuring that fair housing complaints are quickly addressed.*

*States have flexibility in prescribing how State-funded jurisdictions are to address their AFFH certification obligations. Thus, States could determine that a State-funded jurisdiction shall not conduct an AI, but rather take specific actions that promote fair housing choice. (FHPG at 3-4-5)*

While Chapter 3 contains an extensive list of state laws, regulations, and programs, that list does not account for the disparate impact of facially neutral laws on protected classes, and glaringly excludes several state laws with discriminatory effects that may have been passed with discriminatory motives.

The AI points out that the Texas State Legislature has barred local governments from passing certain types of inclusionary zoning ordinances (Texas Local Government Code, Section 214.905), pre-empting the ability of local governments to pass source of income discrimination protection (Texas Local Government Code, Section 250.007), and banning linkage fees (Texas Local Government Code §250.008). However, the AI asserts that because these laws affect all lower income persons (in other words, have a facially neutral effect), they cannot violate the Fair Housing Act (FHA), ignoring that members of protected classes are overrepresented in low-income populations and that the effect of these laws will be discriminatory. This is particularly relevant to bans on source of income discrimination. Source of income discrimination is overwhelmingly a pretext for racial discrimination and discrimination against persons with disabilities. In opposing Dallas's source of income ordinance related to veterans, the Texas Apartment Association asserted that veterans were mentally ill and therefore dangerous, for example.

Texas also requires Public Housing Authorities to hold public meetings on any "housing project" they undertake before the site is formally selected, unrelated to any land use or zoning question and without any other valid governmental interest cited, and prohibits municipalities from issuing permits or other permissions necessary for construction if these meetings are not held. (Texas Local Government Code, Section 392.053, 392.054) Texas Local Government Code §392.054(d) requires:

*At a location at the proposed site that is visible from a regularly traveled thoroughfare, before the 30th day before the date of the meeting the commissioners shall post a sign not less than four feet by four feet with a caption stating "Site of Proposed Housing Project" in eight-inch letters. The*

*sign must state the nature and location of the proposed project, the names and addresses of the governmental entities involved in the development of the project, and the date, time, and place of the meeting.*

This is not a requirement imposed on any other type of housing development, and we note that the notice required for a public housing project is significantly larger than that required for a proposed concrete crushing plant. A law that treats public housing as a more noxious use than a major source of pollution, and gives the public more rights to block it, is clearly not based on any legitimate government interest, but on stereotypes and fears about the families that live in public housing, who are disproportionately people of color. We would point the state to HUD's Title VI Letter of Findings against the City of Houston for an example of racist opposition to public housing that had the effect of excluding people of color from a majority white neighborhood and perpetuating segregation.<sup>3</sup> The State correctly identifies NIMBYism as a major impediment to fair housing choice, but the state has specific laws that enable and encourage NIMBYism. While we understand that the State does not have control over the actions of the State Legislature, these laws should be identified as an impediment to fair housing choice. While individual zoning and land use decisions may be local, they are made in the context, particularly in a state where local authority is limited to powers specifically delegated by the state, of state-set parameters, including the preemption of local authority or requirements that a supermajority of a city council support a development if it receives a certain level of neighborhood opposition.

State law parameters on, for example, the non-entitlement CDBG programs can also have a disparate impact. There may not be political support to target CDBG funds to historically minority-segregated areas of a jurisdiction, or points for matching funds may eliminate minority communities with lower-income populations from qualifying for funds. The state must examine the policy and process by which CDBG and other federal and state funds are distributed and ensure that they AFFH. The fact that TDA does not require agency approval for project sites, and has not indicated that it has any type of fair housing and civil rights review process for project, is a red flag, as is the fact that the agency presents only potential housing projects as subject to any kind of fair housing requirements. The obligation to AFFH applies to all CDBG funds, regardless of use.

The AI also fails to discuss state law regarding the Qualified Allocation Plan (QAP) for the LIHTC program, focusing only on how the program is administered by

TDHCA. The State Legislature is unusually prescriptive, as compared to other states, about the QAP. This law deliberately creates barriers to building affordable housing which is disproportionately occupied by people of color, families with children, and persons with disabilities. In particular, current law assigns a number of points to a letter of support or opposition from the area's State Representative that it effectively enables the representative to veto LIHTC projects in their district. State representatives are not required to conduct any kind of transparent process around this decision, and it is clear that this is a very effective tool for NIMBYs to block affordable housing based on prejudice against the families that will live there.<sup>4</sup>

As *Inclusive Communities Project v. Texas Department of Housing and Community Development* (135 S.Ct. 2507 (2015)) made clear, state administration of the Low Income Housing Tax Credit (LIHTC) program is a major factor in whether racial and ethnic segregation is perpetuated and in whether members of protected classes have fair access to higher opportunity areas. This is particularly true as the LIHTC has become the dominant source of financing for affordable housing developments since the 1990s.

The AI does not include this analysis. Jurisdictions cannot be given the power to effectively veto affordable housing based on discriminatory bias towards members of protected classes. Scoring preferences based on local support or requirements for local approval should be carefully evaluated; scoring preferences that give an effective veto to individual legislators, at the local, state, or federal level, should be subject to an even higher level of scrutiny and justification. Jurisdictions and elected officials cannot avoid their fair housing and civil rights obligations by seeking to remove decision-making power from the public process.

There is also no evaluation of whether there are patterns of discretionary decision-making that override QAP requirements to locate LIHTC developments in poverty-concentrated and minority-segregated areas, perpetuating segregation and depriving protected classes of access to opportunity. In spite of repeated advocacy for "balance" between siting LIHTC projects in high opportunity areas and siting them in high poverty areas, the current distribution of LIHTC developments in Texas is primarily in lower-income neighborhoods and those with minority concentrations. The LIHTC program continues to be ineffective in providing low-income children with access to high-performing lower poverty schools in most metropolitan areas.<sup>5</sup> "Balancing" the distribution of LIHTC starting in the 2010s

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<sup>4</sup> See, e.g. <https://www.texasobserver.org/affordable-housing-house-wins/>

<sup>5</sup> Ellen, Ingrid Gould, and Karen Mertens Horn [2012]. "Do Federally Assisted Households Have Access to

would reinforce and perpetuate a pattern of segregation and deny families choices about where to live. While we understand that TDHCA is under considerable pressure from a range of entities on these issues, the agency must evaluate these demands in accordance with the obligation to AFFH.

While this can be difficult to evaluate, the preservation of affordable housing in gentrifying neighborhoods that would displace the current residents is also an important role for LIHTC developments.

AFFH is concerned not with affordability, but with the location of affordable housing and whether members of protected classes have choices about where to live. Rehabilitation may be an important tool to prevent displacement and preserve access affordable housing in areas that are changing economically and becoming higher opportunity but it can also reinforce and perpetuate long-term patterns of segregation and disinvestment in others. The State's QAP includes an option to transfer the subsidy to another location for high-risk developments, and we encourage the State to highlight and expand this strategy as a way to affirmatively further fair housing. Continuing to renew subsidies on buildings in floodways or in close proximity to environmental hazards fails to affirmatively further fair housing, and places residents at risk, as we see (again) after Hurricane Harvey;

Locating LIHTC developments in distressed communities under the rubric of a "Concentrated community revitalization plan" must mean a meaningful and effective plan that includes substantial non-housing resources. The QAP and Uniform Rules must set out clear standards for review and assessment of these plans. Allowing jurisdictions to simply designate nominal "revitalization" areas perpetuates segregation by steering LIHTC developments into distressed neighborhoods. Even the most positive research on the effect of LIHTC developments on low-income neighborhoods found a limited effect on property values within a 0.1-mile range of the development.<sup>6</sup> There is no research showing an impact on other neighborhood quality measures – access to high-performing schools, jobs, improved infrastructure, or improved health – in contrast to the overwhelming body of research on the negative effects of living in concentrated poverty on individuals and families, and on the positive impact, particularly on children, of moving to higher-opportunity

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High-performing Public Schools?" Furman Center for Real Estate and Urban Policy and Moelis Institute for Affordable Housing Policy.

<sup>6</sup> Diamond, Rebecca and Timothy McQuade, "Who Wants Affordable Housing in Their Backyard?: An Equilibrium Analysis of Low Income Housing Development" NBER Working Paper No. 22204 (April 2016). There are a number of other issues with this study, but the extraordinarily limited effects found as opposed to the large positive effects of access to higher opportunity neighborhoods and integration alone undermine the conclusion.



areas.<sup>7</sup> Even revitalization plans that go beyond an area designation cannot be considered “concentrated community revitalization plans” unless there is a sufficient concentration of resources and interventions in non-housing (infrastructure, economic development, school improvement, etc.) that they can reasonably be expected to result in a racially and economically integrated neighborhood of opportunity within a reasonable period of time. LIHTC investment as the sole or first investment in community revitalization is ineffective and cannot meet the standard for a revitalization plan

## **X. Chapter 9: Disaster Recovery in Texas**

### **1. Mitigation**

Mitigation planning and activities fit naturally with AFFH. Reducing or eliminating long term risk to Texans and their property, which may involve buyouts, elevation, and infrastructure, can help ensure that vulnerable populations, who have often been pushed into geographically vulnerable areas by segregation and discrimination, can move to safety, elevate their homes, and have their communities protected in a way that historical disinvestment often denied them. We recommend that these activities and plans include a specific consideration of the fair housing and civil rights implications of how these funds are awarded, targeted, and administered, much as the General Land Office (GLO) is evaluation disaster recovery funded by CDBG-DR funds. Unfortunately, it does not appear that the Texas Department of Emergency Management (TDEM) participated in the AI, and unclear how it includes a civil rights analysis in its programs and decisions.

Again, this is not a housing agency AI, it is the State of Texas AI. TDEM’s responsibilities include a number of activities and programs that implicate AFFH, including planning, training, administering federal funds, and coordinating preparedness and response for disasters that include hazardous materials, industrial pollution, toxic waste, and chemical spills. Because communities of color are more likely to be located near environmental hazards and industrial uses (again, because of segregation), TDEM’s Technological Hazards Unit has a particular connection to low-income communities and communities of color. Proximity to hazardous uses not only severely affects the health of these communities, it also depresses the value of their homes, limiting their access to housing choice.

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<sup>7</sup> See, e.g. Kevin Sharkey, *Stuck in Place* (2013); and, Chetty and Henderson (2015)

The *Guidance to State and Local Governments and Other Federally Assisted Recipients Engaged in Emergency Preparedness, Response, Mitigation, and Recovery Activities on Compliance with Title VI of the Civil Rights Act of 1964* issued by the United States Departments of Justice (DOJ), Homeland Security (DHS), Housing and Urban Development (HUD), Health and Human Services (HHS), and Transportation (DOT) specifically states that the guidance is “to assist recipients of federal financial assistance engaged in emergency management (e.g., **state and local emergency management agencies**, law enforcement, healthcare service providers, housing and transit authorities) to ensure that individuals and communities affected by disasters<sup>1</sup> do not face unlawful discrimination on the basis of race, color, or national origin (including limited English proficiency) in violation of Title VI of the Civil Rights Act of 1964 (Title VI).” 46 U.S.C. §2000d (emphasis added) This guidance includes a number of best practices for compliance with Title VI, but because TDEM did not participate in the AI, there is description of whether it is engaging diverse groups in planning, or ensuring that there is LEP access. We note that under the Americans with Disabilities Act (ADA) these activities must also be accessible to persons with disabilities.

## 2. Disaster Funding (CDBG-DR)

Texas Appleseed is familiar with problems caused by the extended timeline and CDBG-DR requirements that change with each disaster, and the fact that the State does not have control over these issues. We hope that current federal legislation institutionalizing CDBG-DR as a permanent program and formal part of the federal disaster recovery system will reduce these delays and inconsistencies.

We appreciate that the GLO has institutionalized AFFH reviews as part of the CDBG-DR program. In particular, GLO’s understanding that infrastructure funding is a critical piece of AFFH is important, as is its role in training local governments and assisting them through the process of complying with their AFFH obligations. The State’s use of income proportionality also helps avoid the size of the increase in disproportionate housing needs for protected and vulnerable populations that would result without it.

We also note that Texas’ decision to run its Homeowner recovery programs based on the cost to rebuild a home rather than pre-storm value has avoided racial discrimination issues that resulted in a federal lawsuit under the Fair Housing Act over Louisiana’s post-Katrina Road Home program.

There are, however, several AFFH issues with Hurricane Harvey CDBG-DR

programs.

- Following Hurricane Ike, the State offered homeowners whose homes had been destroyed the option of using their reconstruction benefit amount to rebuild on site, or to voluntarily move to a safer area with less concentrated poverty and lower levels of segregation. Giving homeowners this option helped ensure that the program was not perpetuating segregation by forcing families to stay in riskier neighborhoods.
- Buyout programs must provide families with a real choice. Basing buyout amounts solely on home values, particularly pre-storm values, has a disparate impact on people of color whose home values have been depressed by segregation. It may also have a disparate impact on people with certain disabilities, for whom there are additional costs associated with accessibility. The Harris County Flood Control District's (HCFCD) buyout program, for example, provides additional incentives for low-income families that ensures they can choose to move to equivalent housing in a safer area. While the Federal Register Notice and State Action Plan provide for the use of CDBG-DR funds to provide these incentives, we have not seen any state guidance for local buyout programs that requires their use.
- The Method of Distribution (MOD) process following Hurricane Harvey was flawed. The MOD submitted by Southeast Texas Regional Planning Commission (SETRPC) violated the requirement that CDBG-DR funds be used to address "unmet need", allowing the COG to allocate funds in a way that had a dramatic disproportionate impact on low-income areas and areas where people of color live in the region. SETRPC allocated funds based solely on level of inundation and total population in the inundated area without considering unmet need, ability to recover, or the relative population of the impacted area.

SETRPC's MOD is highly reminiscent of The Texas Department of Rural Affairs' (TDRA, formerly ORCA) discredited "weather model" for Hurricane's Ike and Dolly which considered solely weather data and high water maps without taking into account actual damage, population numbers in affected areas, housing density, types of economic activity, or community demographics. Like the "weather model" SETRPC's "storm impact" based distribution tracks where the weather was most intense, not where damage occurred or where there are CDBG-eligible unmet disaster recovery needs. The use of the "weather model" was the partial basis for a fair housing complaint by Texas Appleseed and Texas Housers against the State of Texas in 2009, which resulted in disapproval of the Ike/Dolly Round 2 Action Plan, the redistribution of CDBG-DR funds, and a Conciliation Agreement.

SETRPC’s “storm impact” methodology results in a disproportionate impact on people of color. The cities in the SETRPC region with the three highest percent Black non-Hispanic populations (Beaumont, Port Arthur, and Orange) are also the three cities with the lowest per capita funding for buyouts. The result is that Port Arthur (a city that is 38.2% Black, 31.8% Hispanic or Latino, and 22% non-Hispanic White) will receive only about twice as much funding as cities with less than 1% of its population. Beaumont (which is 34% non-Hispanic White, 48% Black, and 14.4% Hispanic or Latino) will receive less than twice the funding of cities that are 0.5% of its size.<sup>8</sup> Taylor Landing is 87.3% non-Hispanic White, Bevil Oaks is 81.8% non-Hispanic White, Pine Forest is 90.4% non-Hispanic White, Rose City is 88.4% non-Hispanic White, and Rose Hill Acres is 91.4% non-Hispanic White.<sup>9</sup> The poverty rate is also significantly higher in Beaumont, Port Arthur, and Orange.<sup>10</sup>

Port Arthur, Beaumont and Orange also have the highest number of damaged owner-occupied homes in the region according to FEMA data (which we note undercounts damage to LMI households). This MOD would result in a funding allocation that would disproportionately fund recovery for overwhelmingly White communities while underfunding more diverse and majority-minority cities where the majority of damaged homes are located.

For example, Port Arthur was devastated by Hurricane Harvey. According to SETRPC’s uncited data, almost 50,000 out of its total population of roughly 55,000 (90%) were “impacted” by the storm. Under SETRPC’s “storm impact” methodology, the amount of buyout funding SETRPC has allocated to Port Arthur comes out to \$85 for each impacted person. In Beaumont, the figure is only \$41. Also underfunded are the unincorporated counties of Orange, Hardin, and Jefferson, all of which would receive less than \$200 per impacted

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<sup>8</sup> The City of Orange is 30.8% Black, 7.0% Hispanic or Latino, and 56.6% non-Hispanic White. All data from the U.S. Census Bureau.

<sup>9</sup> <https://datausa.io/>

<sup>10</sup> Median household income in Port Arthur is \$32,003 (with a per capita income of \$18,519) and a poverty rate of 29.3% while Bevil Oaks has a median household income of \$76,574 and a poverty rate of 2.72%. There are even larger disparities between cities like Port Arthur and Beaumont and other small cities that have been slated for allocations over \$1 million. For example, Taylor Landing is a city of about 237 people with a median income of \$45,390<sup>10</sup> and with 22 people (9%) impacted. In Taylor Landing, the average household size is 2.5, so that means about 8.8 homes were impacted. With an allocation of \$1,333,160, that would be \$151,495.45 per home (\$60,598 per impacted person). In Port Arthur, the figure is \$71 per home. (All data from the U.S. Census Bureau)

- person. However, the smaller communities of Bevil Oaks, Pine Forest, Rose City, and Rose Hill Acres, who have been given allocations of \$2 million each, are receiving up to \$4,494 per person.
- In conducting planning activities, we encourage GLO to look at studies like the Colonia Drainage Study as models. Often, there is not sufficient information about the infrastructure needs of historically disinvested areas, and the political and practical incentives are to spend CDBG-DR dollars on already identified infrastructure projects, without any sense of whether those projects actually reflect the greatest need or AFFH. Having planning studies that result in a comprehensive overview of the areas needs and infrastructure deficiencies, particularly in disinvested communities that may lack even basic infrastructure protection, will allow jurisdictions to make a more objective assessment of where its infrastructure needs are, and ensure that protected classes and communities are not being left out of recovery.
  - We are concerned about the new model of state-administered FEMA temporary housing programs. While these programs are presented as state-administered, the reality is that FEMA is making all the eligibility and program assignment decisions. Regardless of the State's administrative competence, FEMA is open about the fact that its assistance is not set up for low-income disaster victims. As former FEMA director Craig Fugate puts it, "[t]he system is really designed for the middle class. It's not designed to take care of pre-existing conditions."<sup>11</sup> In other words, Texans who deal with the ongoing effects of segregation and historical discrimination are deliberately left out of temporary housing programs. Texas has been shortchanged by FEMA's use of the Verified Loss (FVL) of real property (owners) or personal property (renters) methodology. Overall, 54 percent of owners and 53 percent of renters were found to have no unmet needs on the basis that their FVL was below the thresholds set in the draft Action Plan. However, when this is broken down by income level, 69 percent of extremely low income (ELI) owners and 58 percent of ELI renters were found to have no unmet needs. Conversely, only 41 percent of both non-LMI owners and renters were found to have no unmet needs. The conclusion, based on FEMA data, that families making less than 30% of Area Median Income (AMI), which is \$12,060 in the Beaumont-Port Arthur MSA and \$13,100 in the Corpus Christi MSA, have been better able to recover than families making more than double that amount is simply not credible.<sup>12</sup> In addition to the increased

<sup>11</sup> Danny Vinik, *'People Just Give Up': Low-Income Hurricane Victims Slam Federal Relief Programs*, Politico (May 29, 2018), <https://www.politico.com/story/2018/05/29/houston-hurricane-harvey-fema-597912>

<sup>12</sup> Income figures from HUD's FY 2017 Median Family Income (MFI) estimates. Available:

- barriers to application for FEMA benefits for vulnerable populations, FEMA continues to apply the discriminatory “deferred maintenance” standard to the homes of low-income homeowners, particularly in communities of color, making them ineligible for the programs GLO administered post-Harvey, and forcing them to wait for CDBG-DR funds to even begin recovery. The state has no control over how FEMA runs its programs, but we recommend that the GLO assess the successes and failures of these programs post-Harvey and consider how both the disproportionate impact on low-income Texans and discriminatory impact on communities of color can be mitigated.
- AFFH and civil rights must be incorporated into the State’s Action Plan for \$4 billion in CDBG-DR mitigation funds when the Federal Register Notice for these funds is finally published.

### 3. Disaster Recovery issues related to identified impediments

While we appreciate the GLO’s commitment to a robust community participation process, we remind the State that “[t]he Supreme Court has long held, in a variety of circumstances, that a governmental body may not escape liability under the Equal Protection Clause merely because its discriminatory action was undertaken in response to the desires of a majority of its citizens.” *MHANY Management, Inc. v. County of Nassau*, 14-1634-cv(L)) (2nd Cir. 2016) quoting *United State v. Yonkers Board of Education (Yonkers I)*, 837 F.2d 1181, 1224 (2nd Cir. 1987); see also *Palmore v. Sidoti*, 466 U.S. 429, 422 (1984) (“Private biases may be outside the reach of the law, but the law cannot, directly or indirectly, give them effect.”)

We commend the GLO’s stated commitment to ensuring compliance with all federal fair housing and civil rights requirements, and suggest its described AFFH review process as a model for other programs.

Technical assistance and training that includes fair housing and civil rights is an important component of administering federal grants. Further, when Texas Appleseed conducted surveys and interviews with participants representing 18 CDBG-DR subrecipients regarding the FFAST process post-Hurricanes Ike and Dolly, local officials expressed willingness to comply with fair housing requirements, but asked for additional training and models.

The GLO’s statement of principles and criteria for buyout assistance, intended to address potential barriers to mobility and free housing choice, is excellent.

*Provision of uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects;*

- *Ensuring relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement;*
- *Ensuring that no individual or family is displaced unless decent, safe, and sanitary housing is available within the displaced person's financial means;*
- *Aid in the improvement of housing conditions of displaced persons living in substandard housing; and*
- *To encourage and expedite acquisition by agreement and without coercion.*

We look forward to seeing this assistance implemented in buyout and acquisition programs it administers in coordination with impacted communities.

Natural disasters can also increase displacement, not only as a direct effect of the disaster itself and if recovery fails to rebuild housing for vulnerable populations, but by making impacted neighborhoods vulnerable to property speculation and what is commonly referred to as “climate gentrification” or “climate displacement.”

Recovery programs need to ensure that things like infrastructure investment in historically disinvested communities are accompanied by housing programs that help prevent displacement.

## **XI. Chapter 10: Impediments to Fair Housing Choice**

We note, again, that many of the identified barriers to fair housing choice that the State asserts could not be linked to one or more protected classes, could, in fact, be linked to protected classes. We also note that the “action, omission or decision” need not be one made by the agencies who participated in preparing the AI, nor must it be a contemporary action, omission, or decision.

The AI's citation of *Texas Department of Housing and Urban Affairs v. Inclusive Communities Project*, 135 S.Ct. 2507 (2015) to assert that evidence must meet a legal standard to identify an impediment to fair housing choice is both wrong and faintly ludicrous. The AI is in no way analogous to litigation in federal court, it is a planning document that addresses a wide range of issues with complex causes. HUD is clear in the FHPG that a narrowly constructed AI is substantially incomplete and may not support a certification of AFFH. (“State and Entitlement jurisdictions must become fully aware of the existence, nature, extent, and causes of all fair housing problems and the resources available to solve them. Without this information, a State or Entitlement jurisdiction's FHP will fall short of measurable results. . . .A properly completed AI provides this information.” (FHPG at 208))

If the State is interested in significant developments in the law, we suggest it consult the 2015 AFFH regulation, which is the actual relevant law regarding AFFH.

Again, the framing of this AI as one which is limited by the role of agencies who administer federal CPD funds and only have those funds as a resource to address identified impediments mischaracterizes the actual scope of the AI under federal law and guidance.

#### Impediment 1: NIMBY

We agree that NIMBYism is a major barrier to fair housing choice in Texas.

#### Impediment 2: Lack of awareness

While the language of the impediment correctly recognizes that government officials also lack understanding and an awareness of resources on fair housing law, rights, and duties, the subsequent language identifies educational needs only for housing providers and persons seeking housing. The obligation to AFFH does not just apply to housing, it applies to all the activities related to housing and community development. Local officials themselves have requested additional training and resources, particularly around how AFFH applies to non-housing projects.

#### Impediment 3: Homeownership and Lending

Lending discrimination is an impediment to fair housing choice and desegregation, but the subsequent language ignores widespread evidence of lending discrimination. If the State is not satisfied by existing evidence, we suggest it conduct testing to determine whether or not loan denials and predatory terms are based on discriminatory motives.

#### Impediment 4: Lack of accessible units.

This impediment should include the location of accessible units. In this case, the subsequent language is clear that the location of accessible and visitable housing units was as important as scarcity.

#### Impediment 5: Barriers to mobility and free housing choice.

We agree that the issues on this list constitute barriers to fair housing choice, but object to the framing of “credit history” as a problem attributable solely to housing seekers. We also note that there are ways for the State to minimize the impact of these issues, for example, a bill filed this session which would have limited the distribution of eviction information when the case was dismissed or the tenant won the case. Stronger regulation of predatory lenders and insurance discrimination are



also actions the State could take.

This list is also incomplete. It is missing, for example, the deliberate zoning and approval of environmental hazards in neighborhoods of color, which is a major impediment to fair housing choice for those families and communities.

## **XII. Chapter 11: Conclusions and Recommendations.**

We have covered, in previous sections of these comments, why the section on “Context and Limitations” is clearly erroneous.

While we have some specific suggestions for several of the recommendations, overall, our concern is that there are no metrics, timetables, or other ways to measure progress on the action steps. The AI fails to meet the requirements of the FHPG.

*The jurisdiction should define a clear set of objectives with measurable results that it intends to achieve. The sole measure of success for FHP is the achievement of results.*

*These objectives should be directly related to the conclusions and recommendations contained in the AI.*

*For each objective, the jurisdiction should have a set of goals. These might be the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective.*

### *Fair Housing Actions*

- *List fair housing action(s) to be completed for each objective.*
- *Determine the time period for completion.*
- *Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.*
- *Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.*

- *Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.*

FHPG 2-23)

*FHP should include a process for monitoring the progress in carrying out each action and evaluating its effectiveness. The process should identify:*

- *The entity conducting the assessment (jurisdiction or third-party contractor)*
- *The specific assessment activities (e.g., survey, on-site review, telephone interview)*
- *The standards or criteria to be used to determine the effectiveness/ineffectiveness of an action*
- *Any additional areas that require study and analysis or surface as a result of implementing the action*
- *Any recommendations for addressing additional areas.*

(FHPG 2-23)

Recommendation 2:

- The State should not simply “seek out opportunities” to educate local officials, it should require AFFH training as part of the process for seeking and administering federal funds.

Recommendation 4:

- The State should fund fair housing testing in order to identify discrimination that may be invisible to its targets in order to enforce the Fair Housing Act.
- The State must enforce the obligation to AFFH in its programs that sub-grant funding, and monitor its own actions and processes.

Recommendation 5:

- Groups that represent members of protected classes and fair housing advocates must be included. While the interests of trade groups and protected classes may overlap, this is not true for all policies or issues. For example, the TAA’s use of discriminatory stereotypes of people with disabilities to oppose source of income discrimination bans, or developers who can make larger profits by building in distressed areas with little access to opportunity.

### **XIII. Conclusion**

While the AI has identified some important impediments to fair housing choice and recommended some appropriate action steps, for the reasons stated above, the AI is substantially incomplete and inconsistent with fair housing and civil rights requirements.

Sincerely,  
Madison Sloan  
Director, Disaster Recovery and Fair Housing  
[msloan@texasappleseed.net](mailto:msloan@texasappleseed.net)  
512-473-2800 ext 108



Texas Department of Housing and Community Affairs  
Attn: Cate Tracz  
P.O. Box 13941  
Austin, TX 78711-394  
Via email: [cate.tracz@tdhca.state.tx.us](mailto:cate.tracz@tdhca.state.tx.us)

Dear Ms. Tracz:

Thank you for the opportunity to comment on the draft Texas Analysis of Impediments to Fair Housing Choice (AI). As an organization dedicated to research, policy analysis, and advocacy on the part of low-income Texans, we consider this an important chance for the State of Texas to take stock of what we've accomplished in terms of affirmatively furthering fair housing and also what we still have to contend with.

We are concerned that this AI appears to have been conducted as if the scope should be limited to the actions of the agencies that receive funds directly from HUD. This narrow scope does not allow adequate consideration of all the factors in our state that influence fair housing.

The HUD Fair Housing Planning Guide (FHPG), which provides HUD's guidance for AIs, also states that "[a]lthough the grantee's AFFH obligation arises in connection with the receipt of Federal funding, its AFFH obligation is not restricted to the design and operation of HUD-funded programs at the State or local level." (FHPG at 1-3). For this reason, we believe the Draft AI to be incomplete, as it is too narrowly defined to encompass all existing impediments to fair housing that come from other places than the agencies who contributed to the draft.

This inadequacy becomes especially notable when it comes to Chapter 4's Review of Prior and Current Actions Taken to Affirmatively Further Fair Housing. While these individual agencies list the actions they have taken, there is no room for consideration of what else we as a state have or haven't accomplished. The end result is then incomplete and insufficient to address the true scope of what still remains to be done.

Other than this, we would also like to add comments specifically related to Disaster Recovery and the LIHTC program:

### **Disaster Recovery**

#### **Uneven Distribution of Hazard Mitigation Funds**

FEMA's Hazard Mitigation Grant Program comes with the requirement that local jurisdictions provide 25% of the cost of a project. Though cities of varying size and capacity have the need for serious mitigation, there is an uneven capacity in accessing these funds.

First of all, larger cities with more available funds are already more likely to be able to provide the financial match necessary to undertake mitigation projects. They are more likely have the



staff, connections, resources, and experience to apply for and successfully receive funding. Meanwhile, under-resourced jurisdictions lack the capacity to advocate for funds for their region.

Jurisdiction	Applications Submitted	TDEM Recommended	TDEM Alternates
City of Port Arthur	0	0	0
City of Beaumont	0	0	0
City of Orange	13	0	0
Jefferson County	1	0	0
Orange County	0	0	0

Table 1: Applications submitted and recommended for the TDEM Hazard Mitigation Funds, Hurricane Harvey (October 2018, Open Records Request)

The disparity is clear in the allocation of HMGP funds. While well-connected and well-resourced jurisdictions like Houston and Harris County secure funding for proposal after proposal, other hard-hit areas saw no applications at all. The Golden Triangle region, though hit hard by Hurricane Harvey, is dramatically absent from both the applicant pool and the final HMGP funding allocation. This suggests that the region, with large a large percentage of the population being low income people of color, will not see the kind of improvements and investments that will prevent further endangerment of life and property.

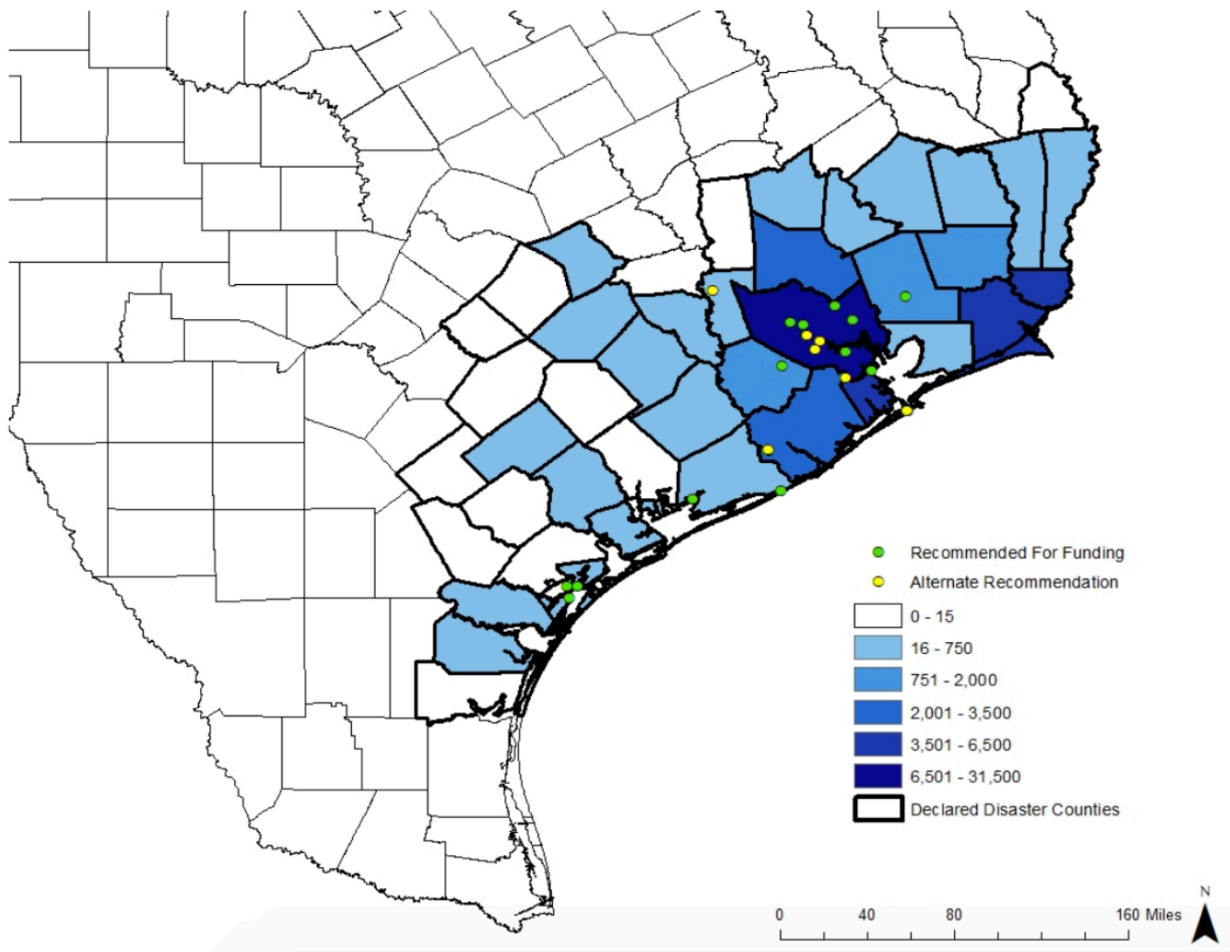


Figure 1: Number of homes that flooded with more than one foot of water and TDEM projects recommended (FEMA and TDEM, 2018)

Given the uneven capacity of local jurisdictions to advocate for needed improvements, it is important for the State to step in and provide strong support for those areas that were severely impacted by recent disasters. Knowing that they have either not applied or that their applications have not been successfully selected, the State must do more to support their acquisition of essential funds for long-term mitigation.

### **Waiver of the 70% income targeting guideline**

Before unmet need from Hurricane Harvey was even assessed, state and local officials were already clamoring for the 70% LMI targeting for CDBG to be reduced. In fact, GLO Commissioner George P. Bush proudly announced in *The Daily News* that, “Four days after the storm hit I emailed our Texas delegation requesting that the LMI threshold be reduced from 70 percent to 50 percent. In early September, I worked with our delegation on a letter to Housing Secretary Ben Carson asking for the same reduction.”



At this point, no robust data existed to suggest what populations would require assistance to recover in the longer term. FEMA assistance hadn't even been handed out yet, and CDBG funds were certainly not yet allocated. It is highly concerning that the office in charge of long-term recovery would immediately jump to reduce the LMI target put in place to ensure an equitable recovery for those with the fewest alternative resources (FEMA, SBA, insurance, credit access, savings, etc.).

In a May 2018 hearing (the month after the Daily News article was released) in front of the House Financial Services Oversight and Investigations Subcommittee, GLO Deputy Director for Community Development and Revitalization Heather Lagrone again advocated for this income target to be lowered.

*“Disasters do not discriminate, and HUD defined, higher income but still working-class families are often equally impacted. HUD’s recent shift away from waiving the LMI aggregate from 70% to 50% for disaster events will prevent communities from being able to recover in a holistic way. It has also made large scale infrastructure projects that could mitigate large areas for future events very difficult.”*

While the flood of letters from local jurisdictions asking for this target to be reduced or waived entirely is expected, the level of advocacy at the state level is concerning. More than a year after Harvey, the uneven ability of families, neighborhoods, towns and regions to recover is clear. The state must stand up for those who will have no other source of recovery, making sure that the most vulnerable don't fall through the cracks, before asking for more funding for individuals and areas that have more at their disposal.

**The way unmet need is assessed by the GLO undercounts those with the lowest incomes.**

The GLO could have used any number of methods for determining the unmet housing need in the disaster area and how funding should be allocated for long-term recovery. When the GLO decided to use a version of HUD's methodology (which uses FEMA data) for determining unmet housing need, this led to a severe undercounting of renters and LMI households.

First of all, those who were ineligible for FEMA are not counted as having unmet need at all because they aren't even in the dataset in the first place. People who were unable to meet the inspector, locate their documentation, or follow through with an appeal may still have unmet need, but they are excluded.

Even those LMI households who are found to have FEMA-verified loss are less likely than their non-LMI counterparts to meet the GLO-determined threshold for inclusion in the unmet need pool. For LMI homeowners, \$8000 in FVL is a high threshold. As the graphic below illustrates, the average FVL for ELI homeowners doesn't reach \$8000, and LMI homeowners with FEMA verified loss are much less likely to meet that threshold, meaning that they will be undercounted.

Because this unmet need count provides the basis for regional allocation of funds, regions with more LMI households saw decreased allocations compared to higher-income areas.

### GLO Methodology: A Standardized Threshold

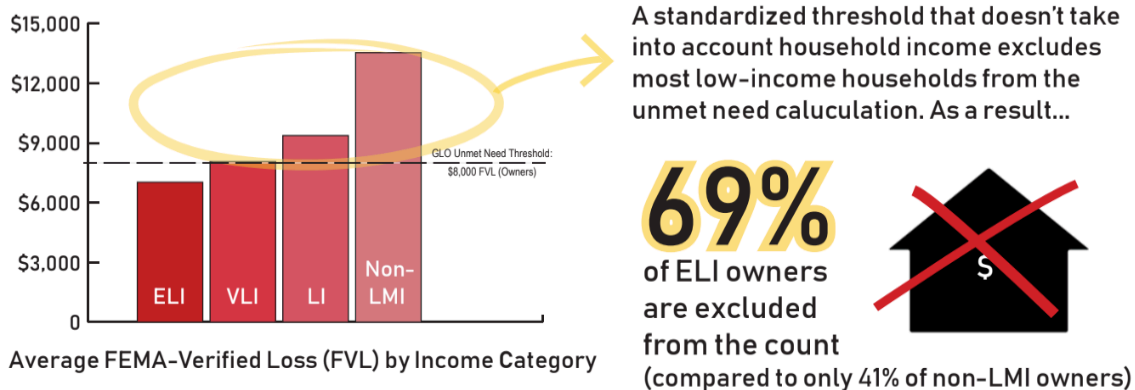


Figure 2: Average FVL by income category for homeowners - Hurricane Harvey

When it comes to accounting the needs of renter households, this methodology is even more unsatisfactory. First of all, it relies only on personal property FEMA-verified loss, since no account is made of damage to their rental unit. The personal property values assessed by FEMA for lower income levels were, again, lower than those for higher-income households. Additionally, renters are much less likely to be found by FEMA to have an FVL over \$0. While 51% of homeowner applicants received an FVL greater than \$0, only 18% of renters did, according to the City of Houston's Action Plan.

The cumulative result of these methodological choices is that areas with more LMI households and more renters are being undercounted when it comes to allocation of funding. This is an error that must be corrected so that members of protected classes, who are more likely to be LMI and/or renters, and their neighborhoods are adequately assisted when it comes to long term recovery. All households who have experienced damage and disruption to their lives need stability and assistance, but those with the fewest resources have to be adequately included.

### **GLO acceptance of discriminatory South East Texas MOD**

The MOD submitted by Southeast Texas Regional Planning Commission (SETRPC) violated the requirement that CDBG-DR funds be used to address "unmet need", allowing the COG to allocate funds in a way that had a dramatic disproportionate impact on low-income areas and areas where people of color live in the region. SETRPC allocated funds based solely on level of inundation and total population in the inundated area without considering unmet need, ability to recover, or the relative population of the impacted area. The result was an extremely small amount of funding per household in Beaumont and Port Arthur and a very large amount of funding per household for smaller communities.





SETRPC's methodology results in a disproportionate impact on people of color. The cities in the SETRPC region with the three highest percent Black non-Hispanic populations (Beaumont, Port Arthur, and Orange) are also the three cities with the lowest per capita funding for buyouts. The result is that Port Arthur (a city that is 38.2% Black, 31.8% Hispanic or Latino, and 22% non-Hispanic White) will receive only about twice as much funding as cities with less than 1% of its population. Beaumont (which is 34% non-Hispanic White, 48% Black, and 14.4% Hispanic or Latino) will receive less than twice the funding of cities that are 0.5% of its size.

Because of the blatant problems with this plan, it should not have been accepted by the GLO and allowed to be implemented by the COG.

### **No program exists for the direct assistance of renters.**

While owners and renters applied for FEMA assistance in virtually equal numbers, and while the State Action Plan states that there was more than \$1.85 billion in unmet need for renters, only one CDBG-DR housing program addressing rental housing (the Multi-Family Program) was created. This program funds the rebuilding of rental housing stock, but this is a slow process, and we have yet to see units on the ground. In the meantime, there are no programs available to assist impacted renters directly.

If a household is unable to secure rental housing they can afford in the interim period between immediate disaster response and long-term housing recovery, they may risk losing their foothold in their neighborhood and city. This can have devastating consequences for families. On the other hand, direct assistance for renters could help families retain their jobs, keep their children in school and maintain crucial social connections in the traumatic post-disaster period.

### **Low-Income Housing Tax Credits**

#### **Waiver of Undesirable Site Conditions**

TDHCA has a process in the State Qualified Allocation Plan (QAP) for evaluating undesirable site and neighborhood standards in considering applications for Low Income Housing Tax Credits. This process is an essential step in Affirmatively Furthering Fair Housing within the LIHTC program. It is designed to ensure that new affordable housing does not perpetuate the concentration of affordable housing, and of people of color who disproportionately comprise the tenants in these developments, in areas of environmental bight, concentrations of poverty, racially segregated neighborhoods and in attendance zones of failing schools.

While this rule is part of the QAP and while the TDHCA staff has routinely noted applications that fail to meet the criteria for an appropriate location, the board of directors of TDHCA has waived the negative area determination and restored the application for consideration. This happens routinely to the point of rendering the criteria irrelevant. This segregative practice is now a major impediment to Fair Housing in Texas and must be identified as such in the AI and an action step proposed to restrain these board actions.



### **Location of LIHTC Developments**

The current distribution of LIHTC developments in Texas is primarily in lower-income neighborhoods and those with minority concentrations. The LIHTC program continues to be ineffective in providing low-income children with access to high-performing lower poverty schools in most metropolitan areas.

This document should include an analysis of the geographic locations of LIHTC projects, both proposed and selected. The characteristics of the neighborhoods where these projects have been located must be assessed and weighed against the goal of locating housing for low-income residents in high-opportunity areas.

### **Local Support and Approval**

Consideration should also be given to the way local officials have used their power to write (or not write) letters of support. In many areas of the state, these letters (and the points they offer) are essentially acting as a veto power given to local officials and their constituents, who may be acting based on discriminatory beliefs.

### **Requirements for Concentrated Community Revitalization Plans**

“Concentrated community revitalization plans” must be defined in a way that ensures they are meaningful and effective, and QAPs must set out clear standards for review and assessment of these plans. Allowing jurisdictions to simply designate nominal “revitalization” areas perpetuates segregation by steering LIHTC developments into distressed neighborhoods. Even the most positive research on the effect of LIHTC developments on low-income neighborhoods found a limited effect on property values within a 0.1-mile range of the development.

### **Other Comments:**

The State’s adoption of a law barring municipalities from enacting local ordinances protecting tenants from discrimination based on source of income is widely acknowledged to constrain housing options of Housing Choice Voucher Holders to areas of racial and poverty concentrations. This is a major impediment to Fair Housing that must be acknowledged in the AI and an action step included to recommend to the Governor and the Legislature made that this law be repealed.

Again, thank you for the opportunity to comment on this draft Analysis of Impediments.

Sincerely,

Amelia Adams  
Community Equity Analyst, Texas Housers

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

STATE OF TEXAS  
CITIZEN/COMMUNITY PARTICIPATION PLAN  
ON  
DRAFT ANALYSIS OF IMPEDIMENTS ("AI")  
TO  
FAIR HOUSING CHOICE

Haven for Hope Volunteer Center  
1 Haven for Hope Way  
San Antonio, TX, 78207

Wednesday,  
April 10, 2019  
10:30 a.m.

BEFORE:

CATE TRACZ, Fair Housing Manager

*ON THE RECORD REPORTING*  
*(512) 450-0342*

I N D E X

SPEAKER

PAGE

Amelia Adams

7

P R O C E E D I N G S

1  
2 MS. TRACZ: Okay. Good morning. My name is  
3 Cate Tracz. I'm the fair housing manager with the Texas  
4 Department of Housing and Community Affairs. Today is  
5 Wednesday, April 10, and the time is 10:42 a.m. I'm  
6 officially calling to order this public hearing in San  
7 Antonio, Texas, on the draft State of Texas Analysis of  
8 Impediments to Fair Housing Choice, or AI.

9 This public hearing is a opportunity to obtain  
10 the views of the public on the draft AI. I'll start with  
11 some administrative reminders. For anyone interested in  
12 speaking, we need you to fill out a witness affirmation  
13 form.

14 If you haven't already completed one, they're  
15 located on the table by the window where you signed in.  
16 As you speak, be sure to provide your name and who you  
17 represent. Please note that this public hearing is being  
18 recorded and all comments will be considered as public  
19 information.

20 Those making public comment are encouraged to  
21 reference a specific section in the draft AI related to  
22 their comment. As a reminder, we are here to accept  
23 public comments and not to respond to questions. All  
24 comments received will be summarized in the final AI.

25 Additionally, recent responses to all comments

1 received will be provided in the final AI as well. If you  
2 do have questions, I'm happy to answer and discuss them  
3 with you afterwards. If you would like to submit written  
4 comment at a later time, please take an information sheet  
5 located at the sign-in table with written submission  
6 details, and please note that all comments must be  
7 received no later than 5:00 p.m., Austin local time, on  
8 Monday, May 6, 2019.

9 Next, I'll give a little bit of background  
10 about the process. Today's public hearing is being held  
11 in accordance with the State Citizen Participation Plan,  
12 as approved by the U.S. Department of Housing and Urban  
13 Development, or HUD.

14 Funds that the State receives from HUD come  
15 with a duty to affirmatively further fair housing. This  
16 obligation comes from the Fair Housing Act of 1968 which  
17 gives HUD the lead role in administering that Act.

18 One of HUD's major planning requirements of its  
19 grantees, including the Texas Department of Housing and  
20 Community Affairs and other state agencies that administer  
21 funds through HUD's Community Planning and Development  
22 Division, is that at least every five years a new  
23 consolidated plan is required to be produced.

24 And please note that information discussed at  
25 today's hearing may also be considered as consultation as

1 it relates to the State of Texas 2020 to 2024 Consolidated  
2 Plan. So prior to beginning this Consolidated Plan for  
3 2020 to 2024, all State agencies that receive Community  
4 Planning and Development funds from HUD are required to  
5 undertake fair housing planning which includes, as  
6 directed by HUD, completing an AI.

7 Completing an AI and documenting action steps  
8 taken to address the identified impediments to fair  
9 housing choice are part of the Department's efforts to  
10 affirmatively further fair housing.

11 The Texas Department of Agriculture, the  
12 General Land Office, the Texas Department of State Health  
13 Services, and the Texas Department of Housing and  
14 Community Affairs are state recipients who disburse  
15 federal funds for the Community Development Block Grant,  
16 CDBG Disaster Recovery Program, the Housing Opportunities  
17 for Persons with AIDS Program, the HOME Program, the  
18 National Housing Trust Fund, and the Neighborhood  
19 Stabilization Program, and the Emergency Solutions Grants  
20 Program.

21 Together, these four agencies are responsible  
22 for carrying out the work of the AI. As the Agency  
23 charged with enforcing the Fair Housing Act in Texas, the  
24 Texas Workforce Commission Civil Rights Division has also  
25 participated in the AI development process.

1           Now, I'll just give a brief overview about the  
2 actual draft AI document. So the draft AI assesses where  
3 Texas is as a state as it relates to fair housing and then  
4 identifies impediments and possible solutions where  
5 applicable and feasible within HUD regulations.

6           This assessment is achieved by looking at  
7 several topics: a statewide overview and regional  
8 analysis of demographics and housing considerations; a  
9 review of existing rules and regulations; a discussion of  
10 actions that have been and are currently being undertaken  
11 to affirmatively affirm fair housing by the State; an  
12 analysis of TDHCA's assisted housing portfolio and lending  
13 programs; and an overview of fair housing complaints and  
14 cases.

15           All of these topics together, presented chapter  
16 by chapter in the draft AI, lay the framework for  
17 identification of statewide impediments to fair housing  
18 choice. Recommended actions to address those identified  
19 impediments are then also provided in the draft AI.

20           So at this time, I'm going to call for  
21 comments. Is there anyone that would like to provide  
22 comment? And if so, I would like to have you fill out --

23           MS. ADAMS: Fill it out first?

24           MS. TRACZ: Yeah.

25           MS. ADAMS: Good. Now I understand.



1 MS. TRACZ: You --

2 MS. ADAMS: Okay.

3 MS. TRACZ: -- can do it after.

4 MS. ADAMS: Okay.

5 MS. TRACZ: Just introduce your name, who you  
6 represent and your comments for the record.

7 MS. ADAMS: My name is Amelia Adams, and I  
8 represent Texas Housers in San Antonio, and I'm a fair  
9 housing and disaster recovery researcher and planner. And  
10 the majority of my concerns have to do with the GLO, and  
11 so I guess it's Section 9, I believe.

12 MS. TRACZ: Chapter 9.

13 MS. ADAMS: That's right. About disaster  
14 recovery.

15 MS. TRACZ: Uh-huh.

16 MS. ADAMS: So I think that there are some  
17 things that the GLO has not considered within -- or  
18 assuming that the GLO is the one writing and providing  
19 those insights about their functioning as the one to  
20 disburse each EDR, and some of the things that I have  
21 concerns about are, first of all, the lack of a program  
22 that directly assists renter households.

23 There's a program that directly assists  
24 homeowners, but there is no program to directly assist  
25 renters. There is a program, of course, to provide funds

1 for multifamily developers, which will then provide more  
2 housing for that renter population, but there isn't any  
3 program that actually helps those renters who've been  
4 displaced, who are going years without the rental market  
5 recovering and they're not able to find housing in that  
6 time, and of course, I understand that renters are not a  
7 protected class, like many other things, but it's, you  
8 know, very, very clear that renters disproportionately  
9 represent members of protected classes.

10 So I think that's one thing. And I have heard  
11 that the -- and I don't know if this is true -- that the  
12 GLO requested from the federal government to be able to  
13 have a program like that to assist renters, but I'm not  
14 sure that that's true, and if it is true, the GLO may want  
15 to include that in the discussion of, you know, what  
16 they've done to remove --

17 MS. TRACZ: We tried.

18 MS. ADAMS: Yeah, yeah.

19 MS. TRACZ: We tried.

20 MS. ADAMS: Exactly. And I actually don't know  
21 the truth of that situation, so it would be great to get  
22 the real story.

23 But you know, again, if they didn't ask to be  
24 able to do that, then that's something I think in future  
25 disasters is really important, because we see renter

1 households unable to recover because they're don't --  
2 they're not allowed to get FEMA funds for destroyed  
3 property because -- or destroyed real property because --

4 MS. TRACZ: Uh-huh.

5 MS. ADAMS: -- they're not owners of real  
6 property.

7 MS. TRACZ: Okay.

8 MS. ADAMS: So that's one comment that I have  
9 about the GLO section. Another comment is about the  
10 waivers requested by the State and the GLO for the  
11 70 percent benefit requirements on AMI for CDBG funds.

12 I think that this is something that really  
13 needs to be considered because, again, income is not a  
14 protected class, but -- sorry -- income -- yeah -- income  
15 is not a protected class, but we know that  
16 disproportionately people of color will fall into that  
17 category or fall into the lower-income AMI category.

18 So I think that the fact that the State just  
19 right from the beginning immediately requested and GLO  
20 immediately requested to remove that 70 percent before  
21 they had any idea who was affected by the disaster or who  
22 was going to be able to recover, who had unmet need --  
23 they removed -- they -- or they requested from HUD to  
24 remove that 70 percent requirement.

25 And I think that that is something that needs

1 to be owned up to, and the fact that also this is  
2 something that's coming from some of the wealthier  
3 communities in Texas that were in the Harvey disaster  
4 area, they raised their hand and said, hey, GLO, we want  
5 you to get rid of this 70 percent, because it means we're  
6 not going to get enough.

7 And I get it. Everybody should have a chance  
8 to recover, including people with savings and with access  
9 to credit. But the people who don't have those things are  
10 the people are really, really going to suffer in the  
11 recovery and really going to have trouble getting back on  
12 their feet.

13 So that 70 percent exists for a reason. It  
14 comes down from HUD through the CDBG requirements for a  
15 reason, and the fact that both the State and the locals  
16 would request for that to be removed I think is really  
17 problematic and should be included in the AI.

18 This is kind of fun because I just get to talk.  
19 I'm so sorry.

20 MS. TRACZ: No, no. This is great.

21 MS. BOSTON: Take your time.

22 MS. TRACZ: This is the kind of information we  
23 want.

24 MS. ADAMS: Okay.

25 MS. BOSTON: Yeah, yeah. This is here for you

1 to like give us all your information.

2 MS. ADAMS: Okay.

3 MS. BOSTON: If you want to additionally submit  
4 written comment --

5 MS. ADAMS: I -- yeah.

6 MS. BOSTON: -- in the future --

7 MS. ADAMS: But once I have it more thought  
8 out --

9 MS. BOSTON: Yeah, yeah. Please take your  
10 time.

11 MS. ADAMS: Okay.

12 MS. BOSTON: We're here for you.

13 MS. ADAMS: Great. Thank you. So another  
14 thing I'm concerned about is the GLO's methodology for how  
15 it determined unmet need and therefore disbursed CDBG  
16 funds by COG, by the COG region.

17 So HUD does provide guidance in certain aspects  
18 of this, but the GLO had made some decisions on their own  
19 about how they were going to determine unmet need that I  
20 think were -- well, I think they were disproportionately  
21 bad for renters and low income people.

22 And for the millionth time, these are not  
23 protected classes, but we know that it's important to  
24 consider. So just to give a little bit of an idea of what  
25 I'm talking about, setting the threshold for -- well,

1 first of all, using FEMA-verified loss as the measure by  
2 which we're going to determine if someone has unmet need  
3 is problematic, because it's -- through data, it's easy to  
4 show that the lower the income of the household, the lower  
5 the assessed FEMA-verified loss is going to be. And for  
6 renters, it's even worse, of course, because their only  
7 available verified loss is coming from their personal  
8 property, not their real property.

9 So the other thing is the thresholds that they  
10 set, which are \$2,000 minimum for renters and \$8,000  
11 minimum for homeowners of FEMA-verified loss, to be  
12 considered as someone who has unmet need, this is  
13 disproportionately cutting out people at the lowest  
14 incomes, and it's -- we've told GLO about this many times  
15 and said this is something that is going to draw more  
16 funds to places with higher incomes and higher property  
17 values, and it's going to draw funds away from places that  
18 have a lot of people who are really going to struggle to  
19 recover.

20 So I think that GLO methodology from the start  
21 really set up an uneven and disproportionate burden on the  
22 households who are least likely to access credit, have  
23 savings and be able to recover on their own. So I think  
24 the GLO really does need to address the decisions that  
25 they made and not just point to HUD and say, HUD made us

1 make those decisions.

2 GLO had the ability to choose how they wanted  
3 to allocate funds and they chose to do it in a way that is  
4 extremely unequal and has a disproportionate impact on a  
5 non-protected class that essentially represents members of  
6 a protected class.

7 And I think the last thing I want to say about  
8 GLO is the -- well, okay. About disaster recovery, the  
9 applications to the Texas Department of Emergency  
10 Management for infrastructure funds to do mitigation  
11 projects -- there's a really clear -- okay.

12 Though it's offered to everyone in the disaster  
13 area -- anyone can apply, and anyone outside the disaster  
14 area can apply because it's mitigation -- the problem is  
15 that we see a really uneven response to those requests for  
16 proposals, and we see, regardless of how equal the playing  
17 field is, there's definitely an equity issue in terms of  
18 which cities are likely to have the capacity and ability  
19 to apply for those funds.

20 We've seen cities like Port Arthur just  
21 completely unable, unsuccessful. They have not applied  
22 for funds that they desperately need. They -- cities like  
23 that need to be a part of those funds, and it may be that  
24 they need additional assistance, and I know there are some  
25 programs for them to receive assistance, maybe through the

1 GLO, or I can't remember exactly who's supposed to provide  
2 assistance.

3 But this is clearly something where areas that  
4 already have money and resources and staff to draw those  
5 funds in are the ones that are getting those funds, and  
6 they're the ones that are applying for those funds.

7 MS. TRACZ: Uh-huh.

8 MS. ADAMS: So it's exacerbating the inequality  
9 between different areas. And that's something I'd like to  
10 elaborate on in my written comments, because I am not an  
11 infrastructure person, but I do think it has a big impact  
12 on housing.

13 MS. TRACZ: Uh-huh.

14 MS. ADAMS: And the -- related to that, I  
15 think, when you look at cities like Houston, some of the  
16 areas that are likely to be undercounted based on the GLO  
17 methodology also the capacity of governments to fight for  
18 things, and of communities to fight for money, Houston has  
19 an incredibly unequal system of infrastructure.

20 You've got open-ditch drainage in a lot of the  
21 historically black communities, and this is something we  
22 absolutely need to consider when we're taking these CDBG  
23 DR funds, and also just hazard mitigation funds in  
24 general, and I know those aren't all administered through  
25 HUD.



1           But we -- I know Houston is a particular area,  
2 but it's a really good example of a place where you have  
3 such deep existing inequality that it's very much about  
4 protected classes and disproportionately impacting them.  
5 But these funds aren't getting to fix those problems, and  
6 I think that that's something that we should reconcile  
7 because if we have another disaster, we're not going to be  
8 any better off in those areas for people to withstand the  
9 impact.

10           So here we are in San Antonio, and I'm talking  
11 all about Hurricane Harvey. So I don't know, I think it  
12 might be interesting to include data on -- well, I don't  
13 know how feasible this is at the state level, and I really  
14 hate to say this with Nathan in the room --

15           MS. BOSTON: He likes it.

16           MS. ADAMS: You're going to have to live with a  
17 little bit -- I'd be very interested in the -- in a kind  
18 of wider sense where money for economic development and  
19 other CDBG funds have gone, in terms of when we look at  
20 regional -- I mean, there's so many regions. This is the  
21 problem.

22           You've got cities and you've got counties and  
23 you've got all these things that are -- all these entities  
24 that are obviously receiving it. And I think maybe that's  
25 something that needs to be considered only on the local

1 level, but there is most likely a discrepancy at the state  
2 level because of all the discrepancies at the local level,  
3 and that may be something that the State has power over,  
4 and it may be something it doesn't, depending on the  
5 situation.

6 MS. TRACZ: So for instance, looking -- like,  
7 the chapter where we had looked at, you know, TDHCA's  
8 programs and compared them to, you know, where they were  
9 in the state and looked at proportionally --

10 MS. ADAMS: Yes.

11 MS. TRACZ: -- and it's like AMI levels, like  
12 trying to do that --

13 MS. ADAMS: Yes.

14 MS. TRACZ: -- for this -- for the CDBG  
15 infrastructure money?

16 MS. ADAMS: Yeah.

17 MS. TRACZ: Okay. Yeah. That is -- I think  
18 that's exactly what you're talking about.

19 MS. ADAMS: Yeah.

20 MS. TRACZ: Okay.

21 MS. ADAMS: This is a comment that somebody  
22 else in my office brought up, and I just want to make a --  
23 put it out there, and I'm not sure -- you all are not  
24 allowed to answer questions. Right?

25 MS. TRACZ: Not at this point.

1 MS. ADAMS: Okay. Well, then I won't bring it  
2 up. I prefer to be able to talk about it. Okay. Let's  
3 see if there's anything else. Yeah. I think that's it.  
4 I do -- I want to hold off on other things for the written  
5 comments, so that I can put my thoughts together a little  
6 bit more --

7 MS. TRACZ: Okay.

8 MS. ADAMS: -- and not just, you know -- yeah.  
9 Okay.

10 MS. TRACZ: Okay.

11 MS. ADAMS: So that's it.

12 MS. TRACZ: Okay. Great. Thank you for your  
13 comments.

14 MS. ADAMS: Yeah.

15 MS. TRACZ: I just have to say this for the  
16 record. Are there any other comments on the draft AI?

17 (No response.)

18 MS. TRACZ: Okay. Seeing none, before I wrap  
19 up this public hearing, I would like to provide  
20 notification of the HUD program year change. The HUD  
21 program year used by the State of Texas Community Planning  
22 and Development, or CPD, annual programs will be changing  
23 from a February to January cycle to a September to August  
24 cycle.

25 Again, the annual CPD programs include the

1 Emergency Solutions Grants Program, the HOME Investments  
2 Partnerships Program, the National Housing Trust Fund  
3 Program administered by the Texas Department of Housing  
4 and Community Affairs.

5 Separately, the Community Development Block  
6 Grant Program administered by the Texas Department of  
7 Agriculture, the Housing Opportunities for Persons with  
8 AIDS Program administered by the Department of State of  
9 State Health Services.

10 The GLO program year is not affected by this  
11 program year change. The purpose of this change is to  
12 align the state fiscal year reporting with the recent time  
13 frame of congressional appropriations process.

14 To accomplish this change, Texas will lengthen  
15 its program year 2019 by seven months, running from  
16 February 1, 2019 through August 31, 2020. Thus, Texas's  
17 program year 2020 will be the first program year on the  
18 new September through August cycle, and will run from  
19 September 1, 2020 through August 31, 2021.

20 Per 24 C.F.R. Section 91.10, Texas submitted  
21 written notification of this proposed change to the HUD  
22 Office of Planning and Community Development in Fort Worth  
23 and received confirmation of this change from that office  
24 on November 23, 2018.

25 With that notification, are there are any

1 comments on this notice of program year change?

2 (No response.)

3 MS. TRACZ: Okay. Seeing none, and seeing that  
4 there are no further comments or commenters for the draft  
5 AI, I would like to thank you for taking the time to  
6 participate in today's hearing. The time is 11:03 a.m.,  
7 and this public hearing is concluded.

8 (Whereupon, at 11:03 a.m., the public hearing  
9 was adjourned.)

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C E R T I F I C A T E

IN RE:        Analysis of Impediments to Fair Housing  
                 Choice Public Hearing

LOCATION:     San Antonio, Texas

DATE:        April 10, 2019

I do hereby certify that the foregoing pages,  
numbers 1 through 20, inclusive, are the true, accurate,  
and complete transcript prepared from the verbal recording  
made by electronic recording before the Texas Department  
of Housing and Community Affairs.

DATE:     May 11, 2019

/s/ Adrienne Evans-Stark  
(Transcriber)

On the Record Reporting &  
Transcription, Inc.  
7703 N. Lamar Blvd., Ste 515  
Austin, Texas 78752

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

STATE OF TEXAS  
CITIZEN/COMMUNITY PARTICIPATION PLAN  
ON  
DRAFT ANALYSIS OF IMPEDIMENTS ("AI")  
TO  
FAIR HOUSING CHOICE

Texas Health & Human Services  
Room 164  
909 W. 45th Street  
Austin, Texas

Friday,  
April 12, 2019  
10:10 a.m.

BEFORE:

NATHAN DARUS, Fair Housing Manager

*ON THE RECORD REPORTING*  
*(512) 450-0342*

I N D E X

<u>SPEAKER</u>	<u>PAGE</u>
Natalie Burtzos	6



P R O C E E D I N G S

1  
2 MR. DARUS: Good morning. I'm Nathan Darus  
3 with the Texas Department of Housing and Community  
4 Affairs. I'm a fair housing research specialist. Today  
5 is Friday, April 12, and the time is 10:11 a.m. I'm  
6 officially calling to order this public hearing in Austin,  
7 Texas on the draft State of Texas Analysis of Impediments  
8 to Fair Housing Choice, or AI.

9 This public hearing is an opportunity to obtain  
10 the views of the public on the draft AI. Some  
11 administrative reminders: For anyone interested in  
12 speaking, we do need you to fill out a witness affirmation  
13 form.

14 If you haven't already completed one, they're  
15 on the table by the entrance to this room where you signed  
16 in. As you speak, be sure to provide your name and who  
17 you represent. Please note that today's public hearing is  
18 being recorded and all comments provided will be  
19 considered public information.

20 Those making public comment are encouraged to  
21 reference a specific section of the draft AI related to  
22 their comment. As a reminder, we are here to accept  
23 public comment and not to respond to questions. All  
24 comment received will be summarized in the final AI.

25 Additionally, reasoned responses to all

1 comments received will be provided in the final AI as  
2 well. If you do have questions, I'm happy to discuss this  
3 with you afterwards. If you would like to submit written  
4 comments at a later time, please take an information sheet  
5 located at the sign-in table within written submission  
6 details.

7 Please note that all comments must be received  
8 no later than 5:00 p.m., Austin local time, on Monday,  
9 May 6, 2019.

10 So a little bit of background: Today's public  
11 hearing is being held in accordance with the State Citizen  
12 Participation Plan, as approved by the United States  
13 Department of Housing and Urban Development, or HUD.

14 Funds that the states receives from HUD come  
15 with a duty to affirmatively further fair housing. This  
16 obligation comes from the Fair Housing Act of 1968, which  
17 gives HUD a lead role in administering that Act. One of  
18 HUD's major planning requirements of its grantees,  
19 including the Texas Department of Housing and Community  
20 Affairs and the other state agencies that administer  
21 funding through HUD's Community Planning and Development  
22 Division, is that at least every five years a new  
23 consolidated plan is required to be produced.

24 Please note that input from this hearing may  
25 also be considered as consultation as it relates to the

1 State of Texas 2020 to 2024 Consolidated Plan. Prior to  
2 beginning the Consolidated Plan for 2020 to 2024, all  
3 State agencies that received Community Planning and  
4 Development Funds from HUD are required to undertake fair  
5 housing planning, which includes, as directed by HUD,  
6 completing an AI.

7           Completing an AI and documenting action steps  
8 taken to address the identified impediments to fair  
9 housing choice are a part of the Department's efforts to  
10 affirmatively further fair housing.

11           The Texas Department of Agriculture, the Texas  
12 General Land Office, Texas Department of State Health  
13 Services and the Texas Department of Housing and Community  
14 Affairs are state recipients who disburse federal funds  
15 for the Community Development Block Grant, CDBG, Disaster  
16 Recovery Program, the Housing Opportunities for Persons  
17 with HIV and AIDS Program, the HOME Program, and the  
18 National Housing Trust Fund, and the Neighborhood  
19 Stability Program, and the Emergency Solutions Grants  
20 Program.

21           Together, these four agencies are responsible  
22 for carrying out the work of the AI. As the Agency  
23 charged with enforcing the Fair Housing Act in Texas, the  
24 Texas Workforce Commission Civil Rights Division has also  
25 partnered in the AI development process.

1           The draft AI assesses where Texas is as a state  
2 as it relates to fair housing and then identifies  
3 impediments and possible solutions, where applicable and  
4 feasible within HUD regulations. This assessment is  
5 achieved by looking at several topics: a statewide  
6 overview and regional analysis of demographics and housing  
7 considerations; a review of existing rules and  
8 regulations; a discussion of actions that have been and  
9 are currently being taken to affirmatively further fair  
10 housing by the State; an analysis of TDHCA's assisted  
11 housing portfolio and lending programs; and an overview of  
12 fair housing complaints and cases.

13           All of those topics together presented chapter  
14 by chapter in the draft AI lay the framework for the  
15 identification of statewide impediments to fair housing  
16 choice. Recommended actions to address those identified  
17 impediments are then also provided in the draft AI.

18           So at this point in time, I'd like those who  
19 have filled out witness affirmation forms to provide any  
20 comment that they wish.

21           MS. TRACZ: Our first speaker is Natalie  
22 Burtzos. Natalie, if you want to come up to that  
23 microphone, please? Thank you.

24           MS. BURTZOS: I'm not quite sure that I'm  
25 ready, but --

1 MS. TRACZ: Take your time.

2 MS. BURTZOS: -- okay. So my name is Natalie  
3 Burtzos, and I have worked for several years in the  
4 Austin-Travis County area with people experiencing  
5 homelessness, particularly those who are reentering the  
6 community from being incarcerated in places such as Travis  
7 County Jail or TDC, and had worked as their caseworker,  
8 and I did that for a few years, and I now work with  
9 residents in the state of Texas who have housing choice  
10 vouchers and are served by private landlords.

11 My comments are mostly about the criminal  
12 background criteria and the impediments that are faced by  
13 many people in protected classes that are disparately  
14 impacted by this.

15 Several different affordable housing providers  
16 in the area have inconsistent policies, and there have  
17 been improvements in how they are displayed and provided  
18 to prospective tenants who have criminal backgrounds, but  
19 the limitations on those have acted as impediments to  
20 accessing housing, particularly some of the  
21 recommendations or rather the typical standard of who can  
22 access affordable housing or any housing, especially in  
23 areas like Austin where housing is competitive, especially  
24 affordable housing, and where the look-back periods are  
25 not really fair to what the person might have been charged

1 with.

2           And then there's also a lot of confusion as to  
3 how people interpret their criminal histories and read  
4 them. I used to be licensed to do criminal background  
5 checks through the direct system, TCIC and NCIC, myself  
6 and look at how to interpret the actual dispositions that  
7 people have faced.

8           And there have been a lot of improvements  
9 locally, especially around the reentry roundtables guide  
10 to -- their guide that provides guidance to landlords and  
11 tenants on how to navigate that within the community, but  
12 there needs to be, I believe, more action taken in  
13 implementing guides like that throughout the state of  
14 Texas.

15           Those that are -- that have had justice system  
16 involvement and have experience incarceration already face  
17 many hurdles in being successful when they reenter the  
18 community. Several people that I have worked with have  
19 also had their identities stolen while they have been  
20 incarcerated, which has also further impacted their  
21 credit, and so we can see that there are a lot of  
22 compounding factors that negatively impact their access to  
23 affordable housing.

24           Another thing that I'd like to comment on, for  
25 those that have been formerly incarcerated seeking

1 affordable housing, is my experience in helping those  
2 people get disability benefits that might secure them a  
3 consistent income.

4           The gaps between the criminal justice system  
5 and the access to disability income are very large because  
6 of who is able to be provided mental health services in  
7 prisons, in jails, and the availability of those services  
8 and the funding behind it, and it can make those who  
9 should have a clear disability case, when they reenter, to  
10 receive benefits such as SSI or SSDI, not able to access  
11 to those things because they don't have enough  
12 documentation around it.

13           And I think that is it for now.

14           MR. DARUS: Okay. Thank you. Do we have  
15 anybody else signed up?

16           MS. TRACZ: Are there any more attendees that  
17 wish to provide comments?

18           (No response.)

19           MS. TRACZ: Okay. Seeing none.

20           MR. DARUS: All right. Before I wrap up this  
21 public hearing, I would like to provide a notification of  
22 the HUD program year change. The HUD program year used by  
23 the State of Texas Community Planning and Development, or  
24 CPD, annual programs will be changing from a February-to-  
25 January cycle to a September-to-August cycle.

1           Again, the annual CPD programs include the  
2 Emergency Solutions Grants Program, Home Investment  
3 Partnerships Program, the National Housing Trust Fund  
4 Program administered by the Texas Department of Housing  
5 and Community Affairs, the Community Development Block  
6 Grant Program administered by the Texas Department of  
7 Agriculture, and the Housing Opportunities for Persons  
8 with HIV and AIDS Program administered by the Department  
9 of State Health Services.

10           The purpose of this change is align the state  
11 fiscal year reporting, and with the recent time frame, the  
12 Congressional appropriations process. To accomplish this  
13 change, Texas will lengthen its program year 2019 by seven  
14 months, running from February 1, 2019 through August 31,  
15 2020.

16           Thus Texas program year 2020 will be the first  
17 program year on the new September-to-August cycle, and  
18 will run from September 1, 2020 through August 31, 2021.  
19 Per 24 CFR 91.10, Texas submitted written notification of  
20 this proposed change to the HUD Office of Planning and  
21 Community Development in Fort Worth, and received  
22 confirmation of this change from that office on  
23 November 23, 2018.

24           Are there any comments on this notice of HUD  
25 program year change?



1 (No response.)

2 MS. TRACZ: If we could just take a brief  
3 pause?

4 (Pause.)

5 MS. TRACZ: Okay, okay. So thank you, Nathan,  
6 for providing that notification of the HUD program year  
7 change, and maybe we can ask again if there were comments  
8 on that program year change, and pick up after we -- where  
9 the pause was?

10 MR. DARUS: Yeah. So are there any comments on  
11 this HUD program year change?

12 (No response.)

13 MR. DARUS: No.

14 MS. TRACZ: Okay. Seeing none. Okay.

15 MR. DARUS: Are there any further comments on  
16 the draft Analysis of Impediments?

17 (No response.)

18 MS. TRACZ: Okay. Seeing none.

19 MR. DARUS: Since there are none, let me thank  
20 you for taking the time to attend today's hearing, and  
21 with that, this public hearing is concluded, and the time  
22 is 10:24 a.m.

23 (Whereupon, at 10:24 a.m., the hearing was  
24 concluded.)

C E R T I F I C A T E

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IN RE:        Analysis of Impediments to Fair Housing  
                 Choice Public Hearing

LOCATION:     Austin, Texas

DATE:        April 12, 2019

I do hereby certify that the foregoing pages,  
numbers 1 through 12, inclusive, are the true, accurate,  
and complete transcript prepared from the verbal recording  
made by electronic recording by Elizabeth Stoddard before  
the Texas Department of Housing and Community Affairs.

DATE:     April 17, 2019

/s/ Adrienne Evans-Stark  
(Transcriber)

On the Record Reporting &  
Transcription, Inc.  
7703 N. Lamar Blvd., Ste 515  
Austin, Texas 78752

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

STATE OF TEXAS  
CITIZEN/COMMUNITY PARTICIPATION PLAN  
ON  
DRAFT ANALYSIS OF IMPEDIMENTS ("AI")  
TO  
FAIR HOUSING CHOICE

City of Lubbock Council Chambers  
1625 13th Street  
Lubbock, TX 79401

Tuesday,  
April 16, 2019  
4:30 p.m.

BEFORE:

NATHAN DARUS, Housing Research Specialist

*ON THE RECORD REPORTING*  
*(512) 450-0342*

I N D E X

SPEAKER

PAGE

Michael Bates

7

P R O C E E D I N G S

1  
2 MR. DARUS: Good afternoon. My name is Nathan  
3 Darus. I'm a fair housing research specialist with the  
4 Texas Department of Housing and Community Affairs. Today  
5 is April 16, and the time is 4:44 p.m. I am officially  
6 calling to order this public hearing in Lubbock, Texas on  
7 the Draft State of Texas Analysis of Impediments to Fair  
8 Housing Choice, or AI.

9 This public hearing is a opportunity to obtain  
10 the views of the public on the draft AI. For anyone  
11 interested in speaking, we need you to fill out a witness  
12 affirmation form. If you haven't already completed one,  
13 they are located on the table by the entrance to this room  
14 where you signed in.

15 As you speak, be sure to provide your name and  
16 who you represent. Please note that today's public  
17 hearing is being recorded, and all comments provided will  
18 be considered public information. Those making public  
19 comment are encouraged to reference a specific section of  
20 the draft AI related to their comment.

21 As a reminder, we are here to accept public  
22 comment and not to respond to questions. All comments are  
23 received -- we receive will be summarized in the final AI.

24 Additionally, recent responses to all comments received  
25 will be provided in the final AI as well.

1           If you do have questions, I am happy to discuss  
2 this with you afterwards. If you would like to submit  
3 written comments at a later time, please take an  
4 information sheet located at the sign-in table with  
5 written submission details.

6           Please note that all comments must be received  
7 no later than 5:00 p.m., Austin local time, on Monday,  
8 May 6, 2019. Today's public hearing is being held in  
9 accordance with the State's Citizen Participation Plan, as  
10 approved by the U.S. Department of Housing and Urban  
11 Development, or HUD.

12           Funds that the State receives from HUD come  
13 with a duty to affirmatively further fair housing. This  
14 obligation comes from the Fair Housing Act of 1968 which  
15 gives HUD a lead role in administering the Act. One of  
16 HUD's major planning requirements of its grantees,  
17 including the Texas Department of Housing and Community  
18 Affairs, is that the other -- and other State agencies  
19 that administer funds through HUD's Community Planning and  
20 Development Division, is that at least every five years a  
21 new consolidated plan is required to be produced.

22           Please note that information discussed at  
23 today's hearing may also be considered as consultation as  
24 it relates to the State of Texas 2020 to 2024 Consolidated  
25 Plan. Prior to beginning the Consolidated Plan for 2020

1 to 2024, all state agencies that receive Community  
2 Planning and Development funds from HUD are required to  
3 undertake fair housing planning, which includes, as  
4 directed by HUD, completing an AI.

5           Completing an AI and documenting action steps  
6 taken to address the identified impediments to fair  
7 housing choice are part of the Department's effort to  
8 affirmatively further fair housing.

9           The Texas Department of Agriculture, Texas  
10 General Land Office, Texas Department of State Health  
11 Services, and the Texas Department of Housing and  
12 Community Affairs are State recipients who disburse  
13 federal funds for the Community Development Block Grant,  
14 CDBG Disaster Recovery Program, the Housing Opportunities  
15 for Persons with HIV and AIDS Program, the HOME Program,  
16 the National Housing Trust Fund, the Neighborhood  
17 Stabilization Program, and the Emergency Solutions Grants  
18 Program.

19           Together, these four agencies are responsible  
20 for carrying out the work of the AI. As the agency  
21 charged with enforcing the Fair Housing Act in Texas, the  
22 Texas Workforce Commission, Civil Rights Division, has  
23 also participated in the AI development process.

24           The draft AI assesses where Texas is as a state  
25 as it relates to fair housing and then identifies

1 impediments and possible solutions where applicable and  
2 feasible within HUD regulations. This assessment is  
3 achieved by looking at several topics: a statewide  
4 overview and regional analysis of demographics and housing  
5 considerations; a review of existing rules and  
6 regulations; a discussion of actions that have been and  
7 are currently being undertaken to affirmatively further  
8 fair housing by the State; an analysis of TDHCA's assisted  
9 housing portfolio and lending programs; and an overview of  
10 fair housing complaints and cases.

11 All of those topics together are presented  
12 chapter by chapter in the draft AI and lay the framework  
13 for the identification of statewide impediments to fair  
14 housing choice. Recommended actions to address those  
15 identified impediments are then also provided in the draft  
16 AI.

17 So at this point in time, I would like to call  
18 our first commenter, Michael Bates, from Legal Aid of  
19 Northwest Texas.

20 MR. BATES: Should I sit here?

21 MS. TRACZ: Yeah.

22 MR. DARUS: Yeah. That's fine.

23 MS. TRACZ: Yeah. Wherever you're comfortable.

24 MR. BATES: Fantastic.

25 MS. TRACZ: The mike's not on.



1 MR. BATES: So my name is Michael Bates. I  
2 work with Legal Aid of Northwest Texas, and we work  
3 alongside of four different neighborhood association in  
4 east Lubbock, specifically from Parkway, Cherry Point,  
5 Chatman Hill, Dunbar-Manhattan and Yellow House Canyon.

6 Those neighborhood associations have come  
7 together over the last year to work on different issues  
8 like land use and planning, understanding different air  
9 quality issues that they face, public transportation issue  
10 that they face, several other city- and state-level  
11 problems that face and want to work together as a  
12 community to help solve.

13 This was brought to their attention by us,  
14 recently through receiving some information through  
15 TDHCA's listserv of knowing about the public comment stage  
16 for the state AI. The difficult aspect of this that they,  
17 as a group, wanted to make comment about was the  
18 coordination between the state AI and actually helping  
19 this play out in the local region.

20 While the regions do address specific  
21 statistical information such as where public housing is,  
22 how long transmit times are, what the types of racial  
23 disparities are that exist, when you only have 13 people  
24 at a public meeting, you may not get a full picture of  
25 really what's going on in the community, and then today,

1 during a public comment period, there is only one person,  
2 I believe, in myself, from the community in representation  
3 of the alliance that is here today.

4 I know in San Antonio as well there was only  
5 one, and in Austin, there were not many. While I know  
6 TDHCA has a lot to coordinate in order to develop a huge  
7 document like this, I think it would be helpful to put  
8 further time down the road into the public comment stage  
9 and into outreach.

10 I think that this could include coordination  
11 with local community development groups who have already  
12 been doing their local AI to reach out to specific  
13 nonprofit organizations, to city officials, to public  
14 housing workers, to public transportation workers, to  
15 actually help see how this State AI would play out  
16 locally, and many of their directors and coordinating  
17 officials and even citizens would be interested in  
18 commenting.

19 I think this would help improve the State AI to  
20 actually have an effect in how it is handled once the  
21 draft is complete, because those people will already be  
22 invested in the process and can then help see how it would  
23 play out.

24 Also, I think as far as local coordination with  
25 state coordination, I know that there are some standard

1 ways of developing contact systems. I think that TDHCA  
2 should look at non-standard systems of developing contact  
3 information, whether that was working with the local  
4 community development to see if there are lists of  
5 neighborhood associations or lists of public housing  
6 officials, lists of homeless outreach directors, people  
7 who are most directly affected by fair housing choice,  
8 would be a great network to develop.

9 I believe we could help offer some of this  
10 network if TDHCA was interested in us helping direct you  
11 to certain people who would be interested in this. The  
12 next aspect that we wanted to address was regional  
13 coordination with state coordination in this plan.

14 I think the state coordination ideas,  
15 especially the five major elements that are listed in the  
16 plan, are great ideas and elements, with problems that  
17 people face in congruence with fair housing choice.  
18 However, if you don't understand how that plays out in a  
19 region, or aren't maybe a little bit more specific about  
20 directing certain statistics in how they may actually play  
21 out, there may be gaps in how the state plan plays out in  
22 the region.

23 So to give you an example, right now, one of  
24 the most major barriers to people in Lubbock who are  
25 dealing with housing issues is public transit. While the

1 plan addresses transit times between work and how people  
2 may actually have access to jobs, the plan does not  
3 address how both rural communities but also our local  
4 community has massive gaps for people with disabilities  
5 with paratransit, and even people without disabilities to  
6 not access huge parts of the city with public transit.

7 Even more specifically, several of the  
8 locations for public housing have no access to public  
9 transportation. I would assume, since this is the case in  
10 Lubbock, it is also the case in many other cities  
11 throughout the United States, but I think if fair housing  
12 could coordinate with TDHCA and TxDOT on projects that  
13 they're working on, that they could actually share this  
14 information and address some of these problems together  
15 through state coordination and regional coordination,  
16 rather than just understanding the statistics locally.

17 An aspect which was left off of the plan for  
18 the majority was environmental hazards in living next to  
19 industrial areas and how that may affect fair housing  
20 choice.

21 While the state AI does address how in a  
22 disaster situation they may work on land use type of  
23 situations or environmental hazards, it does not address  
24 how people living in general dwelling situations may be  
25 dealing with past racial disparities and how that affects

1 where they live today, and maybe even their lack of access  
2 to be able to move may keep them in that situation.

3 I think that, even though the appendices  
4 address several different meetings that TDHCA was involved  
5 in, which address multifamily homes and locations being  
6 right next to industrial uses and how that's dangerous,  
7 the rest of the plan doesn't address any sort of  
8 environmental hazards and how people live or how that  
9 could be a racial dynamic in Texas.

10 As an example, in Lubbock in how this has  
11 played out, is in the 1940s and 1960s, Lubbock was very,  
12 very specific about placing industries around communities  
13 of African-Americans and Hispanics. This was a purposeful  
14 decision by the City of Lubbock back then.

15 However, the housing dynamics haven't changed  
16 since then, majoritively, so most African-Americans and  
17 Hispanics are still dealing with a majority of the  
18 problems with TCEQ issues here locally.

19 I think this would be an interesting thing at  
20 least to address in the region of Lubbock and how maybe  
21 affirmatively furthering fair housing could help people  
22 have access to more cleaner and healthier living  
23 environments.

24 I think overall we have addressed this mostly,  
25 but I think just connecting between the region and

1 connecting between the state in how we ride out the  
2 regional issues would be very, very helpful. I think the  
3 statistics that are addressed are important, like where  
4 African-Americans, where Hispanics, where majoritively  
5 Caucasians are living, but if you don't understand how  
6 some of those issues came to be in the past in that  
7 specific region, you may face problems in solving that  
8 problem.

9 So while this entire system is supposed to  
10 address how past patterns of segregation have led to  
11 housing disparities and work towards solving that, if we  
12 can't address how that specific region was set up in a way  
13 to maybe disparately or even intently discriminate against  
14 certain communities, then we may not understand how to  
15 move forward.

16 I think this could be done in very small ways,  
17 just addressing where multifamily homes are and maybe what  
18 communities of color are living there, but then also  
19 saying maybe the reason that we got there is because of  
20 these certain City actions, and these are some financial  
21 reasons to funnel into that specific area to help people  
22 get out of.

23 The final, just, question more that the  
24 community had was -- in related to -- in relation to  
25 housing loans. There are lots of loans available to

1 extremely and very low income people, but they're very,  
2 very underutilized for minorities in this city.

3 I don't know if that's necessarily an outreach  
4 issue or if that's an access issue. We do know that  
5 certain banks just do not exist in certain communities in  
6 town, but if there is access to loans in relation to  
7 housing projects that HUD or TCEQ have, why people can't  
8 use them.

9 And then finally, as far as my understanding of  
10 the draft -- I may have missed this -- but I think TDHCA  
11 should address how housing vouchers are being used in the  
12 state, whether they're being used effectively or not, and  
13 bringing that more to the table of private markets and how  
14 to advertise that or push it further, because in a lot of  
15 communities, especially here in Lubbock, there's a huge  
16 gap of people who would like to use public housing but  
17 simply a lot of locations will not accept those housing  
18 vouchers.

19 And other states and locales have looked into  
20 how to improve that process and that actually causes less  
21 funding from the state to have to occur. Instead, you can  
22 work with private groups. How can they improve on that  
23 process, and specifically in Lubbock?

24 Those are all the comments that I had today.  
25 Once again, I just want to reaffirm that if there's

1 anything that the Alliance of East Lubbock Neighborhood  
2 Associations can do in the future to help connect TDHCA  
3 with these communities to help bring about more comments  
4 or more influence in these types of plans, they would love  
5 to do so, and we're excited to see how this process can  
6 play out and how they can be a part of it.

7 Thank you.

8 MS. TRACZ: Thank you.

9 MR. DARUS: Are there any further comments for  
10 the draft AI?

11 (No response.)

12 MR. DARUS: Seeing none, we are going to put  
13 this public hearing on pause until --

14 MS. TRACZ: Do you want to go ahead and do  
15 the --

16 MR. DARUS: Oh, do we do that first?

17 MS. TRACZ: -- notification first?

18 MR. DARUS: Okay.

19 MS. TRACZ: Yeah.

20 MR. DARUS: Okay. So before I wrap up this  
21 public hearing, I would like to provide a notification of  
22 the HUD program year change. The HUD program year used by  
23 the State of Texas Community Planning and Development, or  
24 CPD, annual programs will be changing from a February to  
25 January cycle to a September to August cycle.



1           Again, the annual CPD programs include the  
2           Emergency Solutions Grants Program, the HOME Investments  
3           Partnerships Program, and the National Housing Trust Fund  
4           Program administered by the Texas Department of Housing  
5           and Community Affairs, the Community Development Block  
6           Grant Program administered by the Texas Department of  
7           Agriculture, and the Housing Opportunities for Persons  
8           with AIDS Program administered by Department of State of  
9           State Health Services.

10           The purpose of this change is to align with the  
11           State fiscal year reporting, and with the recent time  
12           frame of congressional appropriations process. To  
13           accomplish this change, Texas will lengthen its program  
14           year 2019 by seven months, running from February 1, 2019  
15           through August 31, 2020. Thus, Texas's program year 2020  
16           will be the first program year on the new September to  
17           August cycle, and will run from September 1, 2020 through  
18           August 31, 2021.

19           Per 24 C.F.R. 91.10, Texas submitted written  
20           notification of this proposed change to the HUD Office of  
21           Planning and Community Development in Fort Worth, and  
22           received confirmation of this change from that office on  
23           November 23, 2018.

24           Are any comments on this notice of HUD program  
25           year change?

1 (No response.)

2 MR. DARUS: And are there any further comments  
3 on the draft AI?

4 (No response.)

5 MR. DARUS: Since there are none, I am going to  
6 put this public hearing on hold until either 4:30 --

7 MS. TRACZ: 5:30.

8 MR. DARUS: -- 5:30 -- excuse me -- or until  
9 the end of public comment. It is currently 5:00 p.m.

10 (A short recess was taken.)

11 MR. DARUS: So we have readjourned the meeting.

12 It is currently 5:40 p.m., and there are no further  
13 comments for the draft Analysis of Impediments, so  
14 with that, this public hearing is concluded.

15 (Whereupon, at 5:40 p.m., the public hearing  
16 was adjourned.)

C E R T I F I C A T E

1  
2  
3 IN RE: Analysis of Impediments to Fair Housing  
4 Choice Public Hearing

5 LOCATION: Lubbock, Texas

6 DATE: April 16, 2019

7 I do hereby certify that the foregoing pages,  
8 numbers 1 through 17, inclusive, are the true, accurate,  
9 and complete transcript prepared from the verbal recording  
10 made by electronic recording before the Texas Department  
11 of Housing and Community Affairs.

12 DATE: May 11, 2019  
13  
14  
15  
16  
17

18 /s/ Adrienne Evans-Stark  
19 (Transcriber)  
20

21 On the Record Reporting &  
22 Transcription, Inc.  
23 7703 N. Lamar Blvd., Ste 515  
24 Austin, Texas 78752  
25  
26

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

STATE OF TEXAS  
CITIZEN/COMMUNITY PARTICIPATION PLAN  
ON  
DRAFT ANALYSIS OF IMPEDIMENTS ("AI")  
TO  
FAIR HOUSING CHOICE

MLK Center  
2300 East Butternut Lane  
Midland, TX 79701

Tuesday,  
April 16, 2019  
9:30 a.m.

BEFORE:

NATHAN DARUS, Housing Research Specialist

*ON THE RECORD REPORTING*  
*(512) 450-0342*

I N D E X

SPEAKER

PAGE

Isaac G. Garnett

7

P R O C E E D I N G S

1  
2 MR. DARUS: Good morning. I'm Nathan Darus, fair  
3 housing research specialist for the Texas Department of  
4 Housing and Community Affairs. Today is April 16, and the  
5 time is 10:40 a.m. I am officially calling to order this  
6 public hearing in Midland.

7 MS. TRACZ: It's 9:40 a.m.

8 MR. DARUS: Excuse me. 9:40 a.m. Why did I say  
9 10:40?

10 MS. TRACZ: We were in El Paso yesterday.

11 MR. DARUS: That's what it was. It's officially  
12 9:40 a.m. I'm officially calling to order this public hearing  
13 in Midland, Texas on the draft State of Texas Analysis of  
14 Impediments to Fair Housing Choice, or AI.

15 This public hearing is a opportunity to obtain  
16 the views of the public on the draft AI. For anyone interested  
17 in speaking, we need you to fill out a witness affirmation  
18 form. If you haven't already completed one, they are located  
19 on the table by the entrance to this room where you signed  
20 in.

21 As you speak, be sure to provide your name and  
22 who you represent. Please note that today's public hearing  
23 is being recorded and all comments provided will be considered  
24 as public information. Those making public comment are  
25 encouraged to reference a specific section of the draft AI

1 related to their comment.

2 As a reminder, we are here to accept public comment  
3 and not to respond to questions. All comments received will  
4 be summarized in the final AI. Additionally, recent  
5 responses to all comments received will be provided in the  
6 final AI as well.

7 If you do have questions, I'm happy to answer and  
8 discuss this with you afterwards. If you would like to submit  
9 written comments at a later time, please take an information  
10 sheet located at the sign-in table with written submission  
11 details.

12 Please note that all comments must be received  
13 no later than 5:00 p.m., Austin local time, on Monday, May 6,  
14 2019. Today's public hearing is being held in accordance  
15 with the State's Citizen Participation Plan, as approved by  
16 the U.S. Department of Housing and Urban Development, or HUD.

17 Funds that the State receives from HUD come with  
18 a duty to affirmatively further fair housing. This  
19 obligation comes from the Fair Housing Act of 1968 which gives  
20 HUD a lead role in administering that Act. One of HUD's major  
21 planning requirements of its grantees, including the Texas  
22 Department of Housing and Community Affairs and other State  
23 agencies that administer funds through HUD's Community  
24 Planning and Development Division, is that at least every  
25 five years a new consolidated plan is required to be produced.

1           Please note that information discussed at today's  
2 hearing may also be considered as consultation, as it relates  
3 to the State of Texas 2020 to 2024 Consolidated Plan.

4           Prior to beginning the Consolidated Plan for 2020  
5 to 2024, all State agencies that receive Community Planning  
6 and Development funds from HUD are required to undertake fair  
7 housing planning which includes, as directed by HUD,  
8 completing an AI.

9           Completing an AI and documenting action steps  
10 taken to address the identified impediments to fair housing  
11 choice are part of the Department's efforts to affirmatively  
12 further fair housing. The Texas Department of Agriculture,  
13 General Land Office, Texas Department of State Health  
14 Services, and the Texas Department of Housing and Community  
15 Affairs are State recipients who disburse federal funds for  
16 the Community Development Block Grant, CDBG Disaster Recovery  
17 Program, Housing Opportunities for Persons with HIV and AIDS  
18 Program, the HOME Program, the National Housing Trust Fund,  
19 the Neighborhood Stabilization Program, and Emergency  
20 Solutions Grants Program.

21           Together, these four agencies are responsible for  
22 carrying out the work of the AI. As the Agency charged with  
23 enforcing the Fair Housing Act, the Texas Workforce  
24 Commission, Civil Rights Division, has also participated in  
25 the AI development process.



1           The draft AI assesses where Texas is as a state  
2 as it relates to fair housing and then identifies impediments  
3 and possible solutions where applicable and feasible within  
4 HUD regulations.

5           This assessment is achieved by looking at several  
6 topics: a statewide overview and regional analysis of  
7 demographics and housing considerations; a review of existing  
8 rules and regulations; a discussion of actions that have been  
9 and are currently being undertaken to affirmatively affirm  
10 fair housing by the State; an analysis of TDHCA's assisted  
11 housing portfolio and lending programs; and an overview of  
12 fair housing complaints and cases.

13           All of those topics together, presented chapter  
14 by chapter in the draft AI, lay the framework for the  
15 identification of statewide impediments to fair housing  
16 choice. Recommended actions to address those identified  
17 impediments are then also provided in the draft AI.

18           We'd now like to invite any who have filled out  
19 witness affirmation forms to provide comment. Okay. MS.  
20 TRACZ: Our first speaker is Isaac Garnett. Whenever you're  
21 ready.

22           MR. GARNETT: What do we need to say?

23           MS. TRACZ: Just any public comment that you would  
24 want to provide --

25           MR. GARNETT: Oh.

1 MS. TRACZ: -- for the record, and then you can  
2 also provide written comment, but this is just our way to  
3 formally receive your comment for the record.

4 MR. GARNETT: Yeah. Okay. My first comment is  
5 regarding devising a mechanism in which local communities  
6 can ask for waivers from HUD or TDHCA regarding floodplain  
7 development. That way, we can work with CHODOS and possibly  
8 do an infrastructure development.

9 If we can structure it where, if we provide the  
10 proper evidence, that we can get a waiver, that would be  
11 helpful in us utilizing and partnering with our local  
12 community development housing organizations.

13 MS. TRACZ: And just to clarify, you said that  
14 was for the open 100-year --

15 MR. GARNETT: Floodplains.

16 MS. TRACZ: -- floodplains, the 100-year  
17 floodplain.

18 MS. TRACZ: Okay. Thank you.

19 MR. GARNETT: Currently, we're  
20 restricted -- anything within those boundaries.

21 MS. TRACZ: Okay.

22 MR. GARNETT: And we're just seeking the  
23 opportunity to build in and around existing floodplain maps.

24 MS. TRACZ: Okay.

25 MR. GARNETT: The second thing would be looking

1 at how and if, with the State and the federal working together  
2 with local communities, that we can reevaluate, reexamine  
3 some of the selection regarding the opportunity zones.

4 Currently there is no mechanism to ask to be  
5 included in a second wave of designated opportunity zones.

6 Midland County did not receive a single census tract  
7 regarding the designation of an opportunity zone, and the  
8 criteria is based on a census tract, and my assumption is  
9 that if the CDBG funds and the CDBG target area qualifies  
10 under the need -- poverty, existing poverty rates, then it  
11 would make sense to me that on the opportunity zone we would  
12 also qualify within that scope.

13 Those are my main two comments regarding State  
14 funds and federal partnership as well.

15 MR. DARUS: Okay. Thank you. Seeing as there  
16 are no other attendees right now, before I wrap up this public  
17 hearing, I would like to provide a notification of the HUD  
18 program year change. The HUD program year used by the State  
19 of Texas Community Planning and Development, or CPD, annual  
20 programs will be changing from a February to January  
21 cycle -- or from a February-January cycle to a  
22 September-August cycle.

23 Again, the annual CPD programs include the  
24 Emergency Solutions Grants Program, the HOME Investments  
25 Partnerships Program, and the National Housing Trust Fund

1 Program administered by the Texas Department of Housing and  
2 Community Affairs, as well as the Community Development Block  
3 Grant Program administered by the Texas Department of  
4 Agriculture, and the Housing Opportunities for Persons with  
5 AIDS Program administered by the Department of State of State  
6 Health Services.

7 The purpose of this change is to align the State  
8 fiscal year reporting, and with the recent timeframe of  
9 congressional appropriations process. To accomplish this  
10 change, Texas will lengthen its program year 2019 by seven  
11 months, running from February 1, 2019 through August 31, 2020.

12 Thus, Texas's program year 2020 will be the first program  
13 year on the new September to August cycle, and will run from  
14 September 1, 2020 through August 31, 2021.

15 Per 24 C.F.R. 91.10, Texas submitted written  
16 notification of this proposed change to the HUD Office of  
17 Planning and Community Development in Fort Worth, and received  
18 confirmation of this change from that office on November 23,  
19 2018.

20 Are any comments on this notice of program year  
21 change?

22 (No response.)

23 MR. GARNETT: No.

24 MR. DARUS: All right.

25 MR. GARNETT: I do have one final comment,

1       though --

2                   MR. DARUS:   Certainly.

3                   MR. GARNETT:  -- regarding housing tax credits.

4       I believe -- I have to verify -- I think we're in  
5       Region 6 -- 4 or 6 -- as far as the housing tax credit?

6                   MR. DARUS:   Probably, under TDHCA service  
7       regions.

8                   MS. TRACZ:   Are you asking which region you're  
9       in?

10                  MR. GARNETT:  Yeah.   For awarding --

11                  MS. TRACZ:   I'm not sure, off the top of my head.

12                  MR. DARUS:   I think it's Region 1, I'm almost  
13       positive.

14                  MS. TRACZ:   It's either 1 or 6, because 6 is --

15                  MR. DARUS:   Six is Harris County.

16                  MS. TRACZ:   Okay.   So 3 is --

17                  MR. DARUS:   Well, at any rate --

18                  MS. TRACZ:   Whatever region we're in --[

19                  MR. DARUS:   -- we're in competition with Big  
20       Spring -- I mean, with San Angelo, Midland/Odessa area, like  
21       that, and generally speaking, it only usually awards one  
22       contract or one award, which is okay, but I think if there  
23       was a mechanism that if the balance of funds that are unused  
24       go back into a pool, if they're not awarded or there's some  
25       other issue, that the -- a particular region who already

1 received an award can go back and request a second pass, if  
2 you will --

3 MS. TRACZ: Uh-huh.

4 MR. GARNETT: -- for those funds, if they've gone  
5 unused. That's what we're kind of interested in. So we'd  
6 like to see that.

7 MS. TRACZ: Just as a point of clarification, so  
8 that would also be an appropriate comment for the Qualified  
9 Allocation Plan --

10 MR. GARNETT: Right.

11 MS. TRACZ: -- and the process.

12 MR. GARNETT: Right.

13 MS. TRACZ: Yeah. I'm not quite sure how that  
14 can be addressed in this specific AI document that we're here  
15 to talk about, but the comment for the QAP is coming up, and  
16 I'm sure that you know all that, but I'm happy to show that  
17 information to you as well.

18 MR. GARNETT: Yeah.

19 MS. TRACZ: Okay.

20 MR. GARNETT: We're just trying to see methods  
21 and ways in which we could --

22 MS. TRACZ: Okay.

23 MR. GARNETT: -- further fair housing by bringing  
24 housing into our region --

25 MS. TRACZ: Excellent. Okay.

1 MR. GARNETT: -- and --

2 MS. TRACZ: Yeah.

3 MR. GARNETT: -- it's a tough competition across  
4 the state. We understand that.

5 MS. TRACZ: Yeah. It's a very over-scribed  
6 competition.

7 MR. GARNETT: You know.

8 MS. TRACZ: Yeah. But we will take these comments  
9 back to our housing tax credit folks as well.

10 MR. GARNETT: Thank you.

11 MS. TRACZ: You're welcome.

12 MR. DARUS: Okay. Are there any further comments  
13 for the draft AI?

14 (No response.)

15 MR. DARUS: Since there are none, let thank you  
16 for taking the time to participate in today's hearing. With  
17 that, this public hearing is concluded. The time is 9:51  
18 a.m.

19 (Whereupon, at 9:51 a.m., the public hearing was  
20 adjourned.)

C E R T I F I C A T E

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IN RE:        Analysis of Impediments to Fair Housing  
                 Choice Public Hearing

LOCATION:    Midland, Texas

DATE:        April 16, 2019

I do hereby certify that the foregoing pages,  
numbers 1 through 13, inclusive, are the true, accurate, and  
complete transcript prepared from the verbal recording made  
by electronic recording before the Texas Department of Housing  
and Community Affairs.

DATE:    May 11, 2019

/s/ Adrienne Evans-Stark  
(Transcriber)

On the Record Reporting &  
Transcription, Inc.  
7703 N. Lamar Blvd., Ste 515  
Austin, Texas 78752



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

STATE OF TEXAS  
CITIZEN/COMMUNITY PARTICIPATION PLAN  
ON  
DRAFT ANALYSIS OF IMPEDIMENTS ("AI")  
TO  
FAIR HOUSING CHOICE

J. Erik Jonsson Central Library  
Stone Room (7th floor)  
1515 Young Street  
Dallas, TX 75201

Thursday,  
April 18, 2019  
1:00 p.m.

BEFORE:

NATHAN DARUS, Fair Housing Manager

*ON THE RECORD REPORTING*  
*(512) 450-0342*

I N D E X

<u>SPEAKER</u>	<u>PAGE</u>
Demetria McCain	6
Sandy Rollins	9
Owen Wilson Chavez	10
Demetria McCain	11
Owen Wilson Chavez	12

P R O C E E D I N G S

1  
2 MR. DARUS: Good morning. I'm Nathan Darus,  
3 with the Texas Department of Housing and Community  
4 Affairs. I'm a fair housing research specialist. Today  
5 is Thursday, April 18, and the time is 10:37 a.m.

6 I am officially calling to order this public  
7 hearing in Dallas on the Draft State of Texas Analysis of  
8 Impediments to Fair Housing Choice, or AI.

9 This public hearing is a opportunity to obtain  
10 the views of the public on the draft AI. For anyone  
11 interested in speaking today, we will need you to fill out  
12 a witness affirmation form. If you haven't already  
13 completed one, they are located on the table by the  
14 entrance to this room where you signed in.

15 As you speak, be sure to provide your name and  
16 who you represent. Please note that today's public  
17 hearing is being recorded, and all comments provided will  
18 be considered public information. Those making public  
19 comments are encouraged to reference a specific section of  
20 the draft AI related to their comment.

21 As a reminder, we are here to accept public  
22 comment and not to respond to questions. All comments  
23 received will be summarized in the final AI.  
24 Additionally, recent responses to all comments received  
25 will be provided in the final AI as well.

1           If you do have questions, I am happy to discuss  
2 this with you afterwards. If you'd like to submit written  
3 comments at a later time, please take an information sheet  
4 located at the sign-in table with written submission  
5 details.

6           Please note that all comments must be received  
7 no later than 5:00 p.m., Austin local time, on Monday,  
8 May 6, 2019. Today's public hearing is being held in  
9 accordance with the State's Citizen Participation Plan, as  
10 approved by the United States Department of Housing and  
11 Urban Development, or HUD.

12           Funds that the State receives from HUD come  
13 with a duty to affirmatively further fair housing. This  
14 obligation comes from the Fair Housing Act of 1968, which  
15 gives HUD a lead role in administering that Act.

16           One of HUD's major planning requirements of its  
17 grantees, including the Texas Department of Housing and  
18 Community Affairs and other state agencies that administer  
19 funding through HUD's Community Planning and Development  
20 Division, is that at least every five years a new  
21 consolidated plan is required to be produced.

22           Please note that information discussed at  
23 today's hearing may also be considered as consultation as  
24 it relates to the State of Texas 2020-2024 Consolidated  
25 Plan.

1           Prior to beginning the Consolidated Plan for  
2 2020 to 2024, all state agencies that receive Community  
3 Planning and Development funds from HUD are required to  
4 undertake fair housing planning which includes, as  
5 directed by HUD, completing an AI.

6           Completing an AI and documenting action steps  
7 taken to address the identified impediments to fair  
8 housing choice are part of the Department's efforts to  
9 affirmatively further fair housing.

10           The Texas Department of Agriculture, Texas  
11 General Land Office, Texas Department of State Health  
12 Services, and the Texas Department of Housing and  
13 Community Affairs are state recipients who disburse  
14 federal funds for the Community Development Block Grant,  
15 CDBG Disaster Recovery Program, the Housing Opportunities  
16 for Persons with HIV and AIDS Program, the HOME Program,  
17 the National Housing Trust Fund, the Neighborhood  
18 Stabilization Program, and the Emergency Solutions Grants  
19 Program.

20           Together, these four agencies are responsible  
21 for carrying out the work of the AI. As the agency  
22 charged with enforcing the Fair Housing Act in Texas, the  
23 Texas Workforce Commission Civil Rights Division has also  
24 participated in the AI development process.

25           The draft AI assesses where Texas is as a state

1 as it relates to fair housing and then identifies  
2 impediments and possible solutions where applicable and  
3 feasible within HUD regulations. This assessment is  
4 achieved by looking at several topics: a statewide  
5 overview and regional analysis of demographics and housing  
6 considerations; a review of existing rules and  
7 regulations; a discussion of actions that have been and  
8 are currently being undertaken to affirmatively further  
9 fair housing by the State; an analysis of TDHCA's assisted  
10 housing portfolio and lending programs; and an overview of  
11 fair housing complaints and cases.

12 All of those topics together are presented  
13 chapter by chapter in the draft AI and lay the framework  
14 for the identification of statewide impediments to fair  
15 housing choice.

16 Recommended actions to address those identified  
17 impediments are then also provided in the draft AI. At  
18 this point, I would like to ask for any comments on the  
19 draft AI. Please remember to state your name and any  
20 organization that you represent.

21 MS. TRACZ: Do we have any commenters this  
22 morning?

23 MS. MCCAIN: This is Demetria McCain. I'm  
24 president of the Inclusive Communities Project here in  
25 Dallas. My first comment is on process, that there really

1 should be more notice to the public about this whole  
2 process.

3 The average person who cares about housing, I  
4 don't think knows about it. That's one comment. I  
5 have -- this is a very dense document, so I'm not saying  
6 that all of my verbal comments cover everything, and I may  
7 have -- becoming -- something I might have missed.

8 But there's some data in the Region 3 section  
9 about household burdens and household issues, broken down  
10 by renters and owners, and broken by income, but I don't  
11 see that information broken down by race and ethnicity,  
12 which I think is important as the State sets out what  
13 they're going to do about some of the problems.

14 That seems to be very important, given that  
15 race and ethnicity are protected classes. Example is on  
16 page 153, where I don't see anything broken down by race  
17 or ethnicity. There's a good bit of discussion in the  
18 document in Section -- I think, Chapter 10 about  
19 impediments about some things that the State has heard  
20 about NIMBYism and the problem -- NIMBYism has an effect  
21 on concentrated poverty in the housing realm.

22 But I didn't see strong enough action steps to  
23 overcome that. An example is, obviously, the IRS has  
24 issued a revenue ruling about the State's public  
25 participation in the tax credit award process, and if

1 that's in there, I didn't see it. It needs to be more  
2 prominent, I think, because the example of the state  
3 representative letter weighing in on whether or not tax  
4 credits should be awarded to a particular project in the  
5 community has a big impact, and like I said, that was  
6 cited by the IRS in their revenue ruling, as well as other  
7 input from the local community has had negative fair  
8 housing effects, as cited by the IRS.

9 And I know some things are percolating right  
10 now at the Capitol, particularly regarding the state  
11 representative letter, but I think that needs to be really  
12 strong, and to the extent the State cannot control what  
13 the elected officials do, any mitigating effects that it  
14 can do with its authority so that -- as in this notice of  
15 hearing in 2016, so that the tax credit program is  
16 administered in a way that is consistent with fair  
17 housing, I think is really important, and to overcome that  
18 NIMBY stuff.

19 Related, our elected officials don't seem to  
20 understand what fair housing is, and so some of the other  
21 preemptive measures they have in place -- put in place,  
22 like banning mandatory inclusionary zoning and banning  
23 cities and counties from being able to pass local anti-  
24 voucher discrimination ordinances, is very problematic,  
25 and I think the State needs to take a creative look at



1 figuring out how it can use its own power to help its  
2 counties and cities overcome that state-level problem.

3 And I will be quiet for now and let other  
4 people talk, if they so choose.

5 MR. DARUS: Do we have any further commenters  
6 on the draft Analysis of Impediments?

7 MS. ROLLINS: Well, having just heard about  
8 this this morning and having that --

9 MS. TRACZ: Would you please state your name --

10 MS. ROLLINS: Okay. I'm sorry.

11 MS. TRACZ: -- and --

12 MS. ROLLINS: My name is Sandy Rollins.

13 MS. TRACZ: Okay.

14 MS. ROLLINS: I work with the Texas Tenants  
15 Union, and I found out about this hearing this morning  
16 from a tweet from the Inclusive Communities Project, so I  
17 haven't had an opportunity to review.

18 I think a general comment is -- that I think is  
19 true with probably state resources as well -- we see a lot  
20 of funding focused on what HUD defines as low income,  
21 which is 80 percent of the area median income, but that  
22 doesn't produce housing that is below market in almost  
23 every area of the state.

24 Usually that produces an above-market rent, or  
25 at least a market rent, and because I think people of

1 color are, you know, lower income often -- the people who  
2 need assistance are often people of color -- it would be  
3 important, I think, for resources to be directed at lower  
4 income levels, and they hardly ever are.

5 So if we want to, you know, resolve housing  
6 problems, we've got to target resources for people with  
7 the greatest need, which are often people being  
8 discriminated against. And that may be in here. I have  
9 no idea, but my experience is that it never is.

10 This is recommendations that have been made for  
11 decades.

12 MR. CHAVEZ: Owen Wilson Chavez with the Child  
13 Poverty Action Lab. I think one thing, and not having  
14 read this, and I don't see it in the top impediments, just  
15 skimming the executive summary and reading through that  
16 section at the back really quickly, and Demetria just  
17 brought this up as well, is voucher discrimination that I  
18 think is a major impediment, to not have in the top five  
19 as, you know, it relates to NIMBY-ism, but it's different  
20 as well, that landlords aren't accepting vouchers.

21 And that, you know, in the North Texas Regional  
22 Assessment that UTA did, it found that what -- if  
23 landlords outside of recap areas would accept just four  
24 voucher holders, you could have no voucher holders living  
25 in recap areas, and moving to make that possible, and

1 overcoming those barrier, I think, is absolutely  
2 important, help improve the lives of children and  
3 families.

4 MS. TRACZ: Okay.

5 MR. CHAVEZ: And also not having had -- just  
6 having gotten about 30 pages into this this morning.

7 MS. MCCAIN: Yeah.

8 MS. ROLLINS: Yeah. I second that. Sandy,  
9 Texas Tenants Union.

10 MS. MCCAIN: This is Demetria McCain, the  
11 Inclusive Communities Project. I think -- I would like to  
12 see in the appendix -- and maybe it's there -- I don't  
13 know -- a list of groups and people that participated in  
14 the public go-round, because I didn't anything about it.

15 I don't know that anybody here in the Dallas  
16 area -- I don't know anybody who participated in public  
17 comments in the Dallas area. So that would be good to  
18 make that clear, so we know who you received comments from  
19 in the Dallas area.

20 I don't see anything about the role or the  
21 negative role that our Council on Government plays on this  
22 issue of fair housing. They will often tell you that they  
23 are just transportation-related, but they have a lot of  
24 funding that they use from the federal government that  
25 impacts housing, and so I think that an analysis of the

1 impacts of our -- like, the North Central Texas Council of  
2 Governments, has on housing, particularly concentrating it  
3 in segregated areas, or however they use their funds, I  
4 think, is an important point to include.

5 And I also -- neighborhood equity issues relate  
6 to fair housing, particularly for low income neighborhoods  
7 of color that have homeowners in them, and homeowners  
8 often of color have been historically, back from the red-  
9 lining days, and before that, been in and next to  
10 environmentally toxic-zoned areas, and too often, and  
11 we've seen recently here in Dallas, that the State's own  
12 environmental protection agency has not necessarily come  
13 out with the best enforcement to make sure that  
14 environment is adhered to, and that has a direct impact on  
15 fair housing and how much someone's value of their home  
16 is, how much it affects their health.

17 It affects how they -- the useful enjoyment of  
18 their home, particularly homeowners who are not as able to  
19 move, like renters are. And so the impact of  
20 environmental issues on housing and fair housing, I think,  
21 are important, because our cities are the ones who zone  
22 things, but we do have some state rules and things as it  
23 relates to zoning and specific use permits and things like  
24 that, that I think impact fair housing.

25 MR. CHAVEZ: I would -- this is Owen again from

1 Child Poverty Action Lab -- would echo what Demetria  
2 started with, with the process and looking at -- going  
3 through the introduction where it talks about the process  
4 and the number of meetings.

5 I think it's -- what -- 512 individuals spoken  
6 to over the state. There is one meeting in north Texas,  
7 in Arlington, and it had 33 people, and I think -- just  
8 sort of a process thing, and what I'd like to see broadly,  
9 you know, in future processes, is one meeting in north  
10 Texas, in Arlington, is not ideal to get voices from  
11 everywhere, to get participation from housing  
12 organizations and advocates and governments across the  
13 region.

14 So it was one of the more well attended, based  
15 on that one table, but that's just -- but meetings in  
16 Arlington at the COG headquarters are probably not the  
17 most accessible meetings to practitioners or advocates, in  
18 furthering the --

19 MS. TRACZ: Okay.

20 MR. DARUS: Do we have any further comments for  
21 the draft Analysis of Impediments?

22 FEMALE VOICE: I'm here with ACPS --

23 MS. TRACZ: Okay.

24 FEMALE VOICE: -- Project.

25 MS. TRACZ: Great.

1 MR. DARUS: Okay. Before I wrap up this public  
2 hearing, I would like to provide a notification of the HUD  
3 program year change. The HUD program year used by the  
4 State of Texas Community Planning and Development, or CPD,  
5 annual programs will be changing from a February to  
6 January cycle to a September to August cycle.

7 Again, the annual CPD programs include the  
8 Emergency Solutions Grants Program, the HOME Investments  
9 Partnerships Program, the National Housing Trust Fund  
10 Program administered by the Texas Department of Housing  
11 and Community Affairs, the Community Development Block  
12 Grant Program administered by the Texas Department of  
13 Agriculture, and the Housing Opportunities for Persons  
14 with AIDS Program administered by Department of State of  
15 State Health Services.

16 The purpose of this change is to align with the  
17 State fiscal year reporting with the recent time frame of  
18 congressional appropriations process. To accomplish this  
19 change, Texas will lengthen its program year 2019 by seven  
20 months, running from February 1, 2019 through August 31,  
21 2020.

22 Thus, Texas's program year 2020 will be the  
23 first program year on the new September to August cycle,  
24 and will run from September 1, 2020 through August 31,  
25 2021. Per 24 C.F.R. Section 91.10, Texas submitted

1 written notification of this proposed change to the HUD  
2 Office of Planning and Community Development in Fort  
3 Worth, and received confirmation of this change from that  
4 office on November 23, 2018.

5 Are any comments on this notice of HUD program  
6 year change?

7 (No response.)

8 MS. MCCAIN: Well, no comments. I have a  
9 question. I guess I can't ask questions.

10 MR. DARUS: Are there any further comments on  
11 the draft Analysis of Impediments?

12 (No response.)

13 MR. DARUS: Since there are none, let me thank  
14 you for taking the time to attend today's hearing. With  
15 that, this public hearing is concluded, and the time is  
16 10:49 a.m.

17 (Whereupon, at 10:40 a.m., the public hearing  
18 was adjourned.)

C E R T I F I C A T E

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IN RE:        Analysis of Impediments to Fair Housing  
                 Choice Public Hearing

LOCATION:     Dallas, Texas

DATE:        April 18, 2019

I do hereby certify that the foregoing pages,  
numbers 1 through 16, inclusive, are the true, accurate,  
and complete transcript prepared from the verbal recording  
made by electronic recording before the Texas Department  
of Housing and Community Affairs.

DATE:     May 11, 2019

/s/ Adrienne Evans-Stark  
(Transcriber)

On the Record Reporting &  
Transcription, Inc.  
7703 N. Lamar Blvd., Ste 515  
Austin, Texas 78752



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

STATE OF TEXAS  
CITIZEN/COMMUNITY PARTICIPATION PLAN  
ON  
DRAFT ANALYSIS OF IMPEDIMENTS ("AI")  
TO  
FAIR HOUSING CHOICE

City of Victoria Council Chambers  
107 W. Juan Linn Street  
Victoria, Texas 77901

Wednesday,  
May 1, 2019  
9:30 a.m.

BEFORE:

NATHAN DARUS, Housing Research Specialist

*ON THE RECORD REPORTING*  
*(512) 450-0342*

I N D E X

SPEAKER

PAGE

Johanna Rohan

6

P R O C E E D I N G S

1  
2 MR. DARUS: Good morning. This is Wednesday,  
3 May 1. My name is Nathan Darus; I'm a fair housing  
4 research specialist with the Texas Department of Housing  
5 and Community Affairs. Today is Wednesday, May 1, and the  
6 time is 9:37 a.m.

7 I'm officially calling to order this public  
8 hearing in Victoria, Texas on the draft State of Texas  
9 Analysis of Impediments to Fair Housing Choice, or AI.  
10 This public hearing is an opportunity to obtain the views  
11 of the public on the draft AI.

12 For anyone interested in speaking, we need you  
13 to fill out a witness affirmation form. If you haven't  
14 already completed one, they are located on the desk right  
15 here where you signed in.

16 As you speak, be sure to provide your name and  
17 who you represent. Please note that today's public  
18 hearing is being recorded, and all comments provided will  
19 be considered public information.

20 Those making public comment are encouraged to  
21 reference a specific section of the draft AI related to  
22 their comment. As a reminder, we are here to accept  
23 public comment and not to respond to questions. All  
24 comments received will be summarized in the final AI.

25 Additionally, reasoned responses to all

1 comments received will be provided in the final AI as  
2 well. If you do have questions, I'm happy to discuss this  
3 with you afterwards. If you would like to submit written  
4 comments at a later time, please take an information sheet  
5 located at the sign-in table with written submission  
6 details.

7 Please note that all comments must be received  
8 no later than 5:00 p.m., Austin local time, on Monday,  
9 May 6, 2019.

10 Today's public hearing is being held in  
11 accordance with the State's Citizen Participation Plan, as  
12 approved by the U.S. Department of Housing and Urban  
13 Development, or HUD.

14 Funds that the state receives from HUD come  
15 with a duty to affirmatively further fair housing. This  
16 obligation comes from the Fair Housing Act of 1968, which  
17 gives HUD a lead role in administering that Act. One of  
18 HUD's major planning requirements of its grantees,  
19 including the Texas Department of Housing and Community  
20 Affairs and the other state agencies that administer  
21 funding through HUD's Community Planning and Development  
22 Division, is that at least every five years a new  
23 consolidated plan is required to be produced.

24 Please note that information discussed at  
25 today's hearing may also be considered as consultation as

1 it relates to the State of Texas 2020 to 2024 Consolidated  
2 Plan. Prior to beginning the Consolidated Plan for 2020  
3 to 2024, all State agencies that receive Community  
4 Planning and Development Funds from HUD are required to  
5 undertake fair housing planning, which includes, as  
6 directed by HUD, completing an AI.

7           Completing an AI and documenting action steps  
8 taken to address the identified impediments to fair  
9 housing choice are a part of the Department's efforts to  
10 affirmatively further fair housing.

11           The Texas Department of Agriculture, Texas  
12 General Land Office, Texas Department of State Health  
13 Services, and the Texas Department of Housing and  
14 Community Affairs are state recipients who disburse  
15 federal funds for the Community Development Block Grant,  
16 CDBG Disaster Recovery Program; Housing Opportunities for  
17 Persons with HIV and AIDS Program; the HOME Program; the  
18 National Housing Trust Fund, the Neighborhood  
19 Stabilization Program; and the Emergency Solutions Grants  
20 Program.

21           Together, these four agencies are responsible  
22 for carrying out the work of the AI. As the Agency  
23 charged with enforcing the Fair Housing Act in Texas, the  
24 Texas Workforce Commission's Civil Rights Division has  
25 also participated in the AI development process.

1           The draft AI assesses where Texas is as a state  
2 as it relates to fair housing and then identifies  
3 impediments and possible solutions, where applicable and  
4 feasible within HUD regulations. This assessment is  
5 achieved by looking at several topics: a statewide  
6 overview and regional analysis of demographics and housing  
7 considerations; a review of existing rules and  
8 regulations; a discussion of actions that have been and  
9 are currently being taken to affirmatively further fair  
10 housing by the State; an analysis of TDHCA's assisted  
11 housing portfolio and lending programs; and an overview of  
12 fair housing complaints and cases.

13           All of those topics together presented chapter  
14 by chapter in the draft AI lay the framework for the  
15 identification of statewide impediments to fair housing  
16 choice. Recommended actions to address those identified  
17 impediments are then also provided in the draft AI.

18           At this point in time, I would like to call any  
19 who have comments for the Draft Analysis of Impediments.

20           MS. ROHAN: I would just like to say that --

21           MS. TRACZ: Could you just state your name and  
22 who you represent.

23           MS. ROHAN: My names' Johanna Rohan, and I  
24 represent the Aging and Disability Resource Center and  
25 211.

1           And so I would just say on the impediments,  
2 like, for example, the first one, the not in my backyard  
3 syndrome, it's talked about, and I can't recall which  
4 agency, you know, it was under, but it talked about what  
5 they've been doing, but it wasn't really specific enough  
6 for me; like I wanted to know how did you do that to  
7 address the not in my backyard syndrome.

8           So maybe just a little bit more -- so it's a  
9 900-page document, and I'm not asking for more detail, but  
10 at the same time, maybe some of the information wasn't as  
11 necessary and some more necessary information, you know,  
12 could replace it, like specifics on how you addressed not  
13 in my backyard syndrome.

14           MR. DARUS: Are there any further comments on  
15 the draft AI?

16           (No response.)

17           MR. DARUS: Okay. Before I wrap up this public  
18 hearing, I would like to provide notification of the HUD  
19 program year change. The HUD program year used by the  
20 State of Texas' Community Planning and Development, or  
21 CPD, annual programs will be changing from a February-to-  
22 January cycle to a September-to-August cycle.

23           Again, the annual CPD programs include the  
24 Emergency Solutions Grant Program, the Home Investment  
25 Partnerships Program, the National Housing Trust Fund

1 Program administered by the Texas Department of Housing  
2 and Community Affairs; the Community Development Block  
3 Grant Program administered by the Texas Department of  
4 Agriculture; Housing Opportunities for Persons with HIV  
5 and AIDS Program administered by the Department of State  
6 Health Services.

7 The purpose of this change is to align with the  
8 state fiscal year reporting, and with the recent time  
9 frame of the Congressional appropriations process. To  
10 accomplish this change, Texas will lengthen its program  
11 year 2019 by seven months, running from February 1, 2019  
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14 first program year on the new September-to-August cycle,  
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17 notification of this proposed change to the HUD Office of  
18 Planning and Community Development in Fort Worth, and  
19 received confirmation of this change from that office on  
20 November 23, 2018.

21 Are there any comments on this notice of HUD  
22 program year change?

23 (No response.)

24 MR. DARUS: Okay. Are there any further  
25 comments on the draft analysis of impediments?



1 (No response.)

2 MR. DARUS: Since there are none, let me thank  
3 you for taking the time to attend today's hearing. With  
4 that, this public hearing is concluded, and the time is  
5 9:45 a.m.

6 (Whereupon, at 9:45 a.m., the hearing was  
7 concluded.)

C E R T I F I C A T E

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IN RE:        Analysis of Impediments to Fair Housing  
                 Choice Public Hearing

LOCATION:     Victoria, Texas

DATE:        May 1, 2019

I do hereby certify that the foregoing pages,  
numbers 1 through 10, inclusive, are the true, accurate,  
and complete transcript prepared from the verbal recording  
made by electronic recording before the Texas Department  
of Housing and Community Affairs.

DATE:     May 10, 2019

/s/ Laurel H. Stoddard  
(Transcriber)

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