



FORT WORTH HOUSING SOLUTIONS

NORTH TEXAS REGIONAL HOUSING ASSESSEMENT

2018

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SECTION I

COVERSHEET

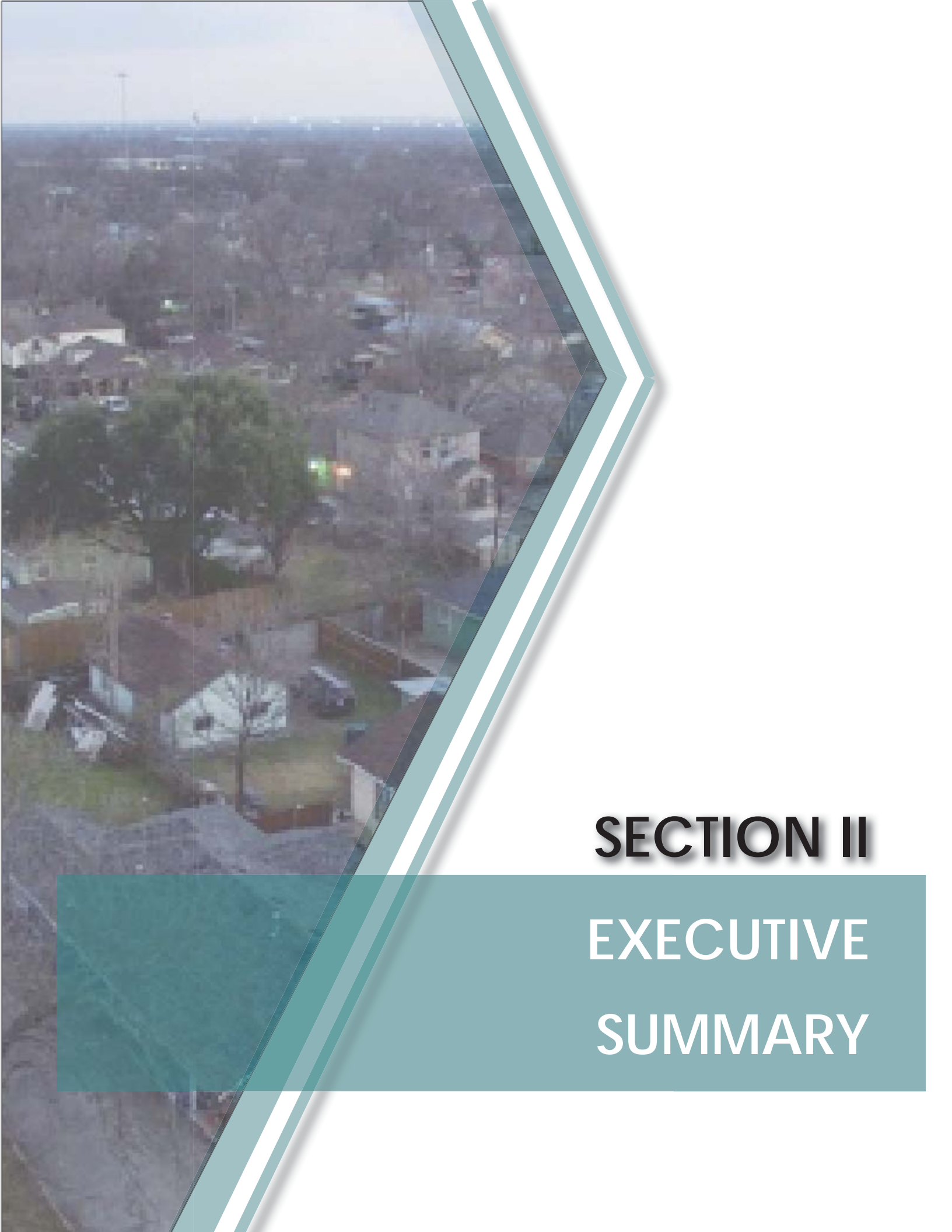
I. Cover sheet

1. Submission date:
2. Submitter name:
3. Type of submission (e.g., single program participant, joint submission):
4. Type of program participant(s) (e.g., consolidated plan participant, PHA):
5. For PHAs, jurisdiction in which the program participant is located:
6. Submitter members (if applicable):
7. Sole or lead submitter contact information:
 - a. Name:
 - b. Title:
 - c. Department:
 - d. Street address:
 - e. City:
 - f. State:
 - g. Zip code:
8. Period covered by this assessment:
9. Initial, amended or renewal AFH:
10. To the best knowledge and belief, the statements and information contained herein are true, accurate and complete and the program participant has developed this AFH in compliance with 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o) and 903.15(d), as applicable.

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

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

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



SECTION II

EXECUTIVE SUMMARY

II. Executive Summary

The North Texas Regional Housing Assessment (NTRHA) was created in 2016 as a consortium of 20 Dallas-Fort Worth (DFW) cities and housing authorities to respond to the U.S. Department of Housing and Urban Development's (HUD) requirement to complete an Assessment of Fair Housing (AFH). NTRHA contracted with researchers representing the Department of Civil Engineering and the College of Architecture, Planning and Public Affairs at the University of Texas at Arlington to complete the assessment on behalf of consortium members using HUD-provided data and analytical tools supplemented by locally generated information.

This report documents the AFH process and findings for the jurisdiction of Fort Worth Housing Solutions (FWHS) consisting of the City of Fort Worth (CFW) and Tarrant County, excluding the City of Arlington. Results are discussed in the following sections:

- **Community participation** – NTRHA gathered information from the public, stakeholders and subject matter experts through public meetings (11), focus groups (10), consultations (74) and surveys (CFW, 1604; NTRHA, 157). Focus groups and public meetings involved more than 300 attendees from throughout the community.¹
- **Assessment of past goals and accomplishments** – FWHS has made progress toward affirmatively furthering fair housing by developing affordable housing throughout the community, redeveloping aging and substandard housing, maintaining strong self-sufficiency programs, working through community partners to provide supportive services and improving the infrastructure of its organization.
- **Fair housing analysis** – Researchers studied census data, stakeholder and expert knowledge and national, state and local information sources to create an informed picture of fair housing conditions in the FWHS jurisdiction. Study areas included racial and ethnic segregation, concentrations of poverty, housing problems for persons with disabilities, limited English proficiency, families with children, seniors and other protected classes to identify fair housing issues and barriers to access to opportunity.
- **Fair housing goals and priorities** – Researchers and FWHS leaders identified priorities for action among fair housing issues identified through the research process and set long-range goals that addressed these issues.

Five fair housing issues emerged from analysis of census data and expert sources:

- **Segregation** – Residential segregation has declined for Hispanic and black households since 1990 but remains moderate to high. The majority of black and Hispanic households in the jurisdiction live in census tracts where rates of minorities exceed the jurisdiction average by over 30%.
- **Concentration of poverty** – The number of census tracts in the jurisdiction with high rates of residents with income below the federal poverty level significantly increased from 1990 to 2015. These census tracts (21) are predominantly located in southeast and north Fort Worth where 69% to 98% of the residents are minorities.

¹ NTRHA and FWHS thank the CFW for its collaboration in accomplishing broad and well-planned public participation. The following report incorporates information gathered through CFW surveys and focus groups as documented in the City's 2017 draft AFH report in addition to data gathered from NTRHA focus groups, surveys, consultations and public meetings.

² Two additional meetings were originally scheduled for far north Fort Worth, Council District 7. AFH public meetings had become confused in social media traffic with issues regarding the relocation of public housing residents of the Butler community through the RAD program. (See Facebook post in Appendix for example.) Additional meetings in far north

- **Location of publicly supported housing** – Half of the Housing Choice Vouchers used in the jurisdiction are located in just 22 census tracts, primarily in southeast, far east and far south Fort Worth. FWHS affordable housing developments, however, are increasingly spread throughout the community, including in lower poverty areas.
- **Housing cost** – Home prices, apartment rents and property taxes continue to rise rapidly and exceed the capacity of many residents to afford housing, especially households with income at or below 30% of the area median income, persons with disabilities, persons living on fixed incomes and single-parent families with small children.
- **Access to employment** – Lower income residents have limited access to affordable housing in proximity to good jobs with better wages. The lack of affordable transit options worsens this problem.

Participants identified six additional issues in public engagement activities:

- **Lack of affordable housing** – Rising housing costs and limited access to housing assistance make it increasingly difficult for support and service workers, low-income families and persons living on fixed incomes, including seniors and persons with disabilities, to find housing.
- **Discrimination** – Most landlords will not accept renters paying with housing subsidies. Community opposition to the spread of affordable housing throughout the City continues.
- **Lack of affordable transportation** – Affordable transportation options are not adequate to support participation in work, commercial and civic life and recreation.
- **Lack of integrated, supported, affordable housing for persons with disabilities** – Most persons with disabilities find housing completely unaffordable, especially when compared with limited and fixed incomes.
- **Resources for fair housing enforcement** – Residents need more support to know and exercise their rights in relation to problems with landlords and tenancy. Fair housing agencies are being asked to do more with no increase in resources.
- **Investment in and revitalization of neighborhoods** – Older, lower income neighborhoods need more investment to improve and increase public infrastructure, retail services and recreational opportunities.

FWHS set five goals to address these issues:

- Increase access to affordable housing in high-opportunity areas
- Increase supply of affordable housing units
- Increase supply of accessible, affordable housing for persons with disabilities
- Increase access to information and resources on fair and affordable housing
- Maintain and improve the quality, management and community impact of publicly supported housing

An aerial photograph of a residential neighborhood with houses, trees, and a street. A large, stylized teal arrow graphic with a white outline points from the left towards the right, partially obscuring the background image.

SECTION III

COMMUNITY PARTICIPATION PROCESS

III. Community Participation Process

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

The North Texas Regional Housing Assessment (NTRHA) public participation strategies incorporated an evolving process, using a combination of methods to make sure that the community was as engaged in the process as possible. NTRHA used input gathered at each stage to shape later efforts and research. Figure 1 displays public participation strategies selected to engage stakeholders in the AFH process, including the goals and target groups for each strategy.

Strategy	Goals	Target Groups
Public Meetings	<ul style="list-style-type: none"> • Fulfill governmental requirements for transparency • Convey HUD data in understandable ways to the public • Provide opportunity for attendees to comment on information provided • Gather community reaction to HUD data and local information about fair housing opportunities 	<ul style="list-style-type: none"> • All citizens interested in the subject • Low-income community members • Residents of publicly supported housing
Focus Groups – Demand Side	<p>Gather local and site-specific information about housing experiences and needs, including:</p> <ul style="list-style-type: none"> • Disparate treatment in housing access • Impediments to accessing affordable, quality housing • Barriers to housing in high-opportunity areas • Experiences with gaining access to high-quality education, affordable transportation, environmentally healthy communities • Satisfaction with ability to access fair housing information • Priorities for housing improvement • Experiences with publicly supported housing programs, including positive and negative 	<ul style="list-style-type: none"> • Consumers of publicly supported housing programs • Residents of low-income communities • Persons with disabilities • Renters and owners • Seniors • Limited English proficiency groups

Figure 1: Public participation goals, strategies and targets

Strategy	Goals	Targets
Focus Groups – Supply Side	<p>Gather local and jurisdiction-specific information about challenges of producing and supporting affordable housing, including:</p> <ul style="list-style-type: none"> • Housing market conditions such as cost, availability, development, etc. • Programs available to assist homeowners and renters • Programs available to support developers (tax credits, etc.) • Public housing authority operations, management, conditions, challenges • Supportive services available for low-income housing residents to increase opportunity and access to affordable housing • Strategies for increasing accessibility to affordable housing in high-opportunity areas and improving conditions in low-opportunity areas 	<ul style="list-style-type: none"> • Housing authority and city staff and leadership • Real estate professionals, associations • Developers and owners/managers of rental housing properties • Affordable housing providers • Providers of housing services and supports for low-income residents
Consultations	<p>Gather local information on:</p> <ul style="list-style-type: none"> • School systems and the impact of housing instability on education outcomes • Environmental hazards affecting residents • Transportation system capacity and gaps • Other systemic barriers to affordable housing, including criminal background, bad credit, family size, disability • Health outcomes and disparities based on location of residence 	<ul style="list-style-type: none"> • School district staff, leadership, homelessness coordinators • Planning managers of transit programs • City and county staff and leaders • Low-income housing advocates • Advocates for special populations, including persons with disabilities, low-income community residents, minorities, women • Low-income housing academic experts
Survey	<p>Gather information on housing and neighborhood priorities from community members</p>	<ul style="list-style-type: none"> • Public at large • Consumers of publicly supported housing • Special housing needs groups

Independent facilitators, i.e. members of the research team, rather than individuals associated with Fort Worth Housing Solutions (FWHS), conducted all public participation efforts throughout the life of this project, including public meetings and focus groups. This ensured that all community members would feel comfortable sharing first-hand experience and knowledge and

could criticize agencies openly, if desired. NTRHA is confident that this report captures an accurate account of housing realities.

Web Presence

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

NTRHA launched a Facebook page early in the project (first post Feb. 10, 2017) where it shared media mentions of the AFH, links to the survey (discussed below), public meeting dates and photos of the NTRHA team engaging with the community. These tools proved useful for immediate updates and promoting public engagement in the project. The Facebook page garnered approximately 120 "likes" overall but achieved additional engagement through sharing and "liking" individual posts. The NTRHA used social media in a supporting role to other methods of online outreach such as the website and email.

At each stage of the research process, NTRHA updated its online presence (website and social media). This included updates to the data, new surveys and other voting tools such as the draft goals poll initiated during the second round of public meetings. Participating jurisdictions and advocacy groups incorporated links to the NTRHA website and the NTRHA surveys on their websites. These organizations also promoted public meetings and focus groups. Other websites covered the NTRHA in their ongoing blogs and news pages. Websites posting NTRHA information included:

- Deaf Network.com – Housing focus groups for people with ALL Disabilities (DeafNetwork.com, 2017)
- University of Texas at Arlington – Aim of assessment study to foster collaboration (Booth, 2017)
- City of Fort Worth – Two meetings to discuss Assessment of Fair Housing (City of Fort Worth, 2018)
- ICP - Getting your fair housing concerns heard – VRO Webinar (ICP: inclusive communities project, 2017)
- National Apartment Association – DFW Continues Regional Assessment (NAA: National Apartment Association, 2018)
- City of Fort Worth – Assessment of Fair Housing (City of Fort Worth, 2018)
- Community for Permanent Supported Housing – NTR Fair Housing Assessment Meetings (Community for Permanent Supported Housing, 2018)
- CPSH – Across DFW: Assessment of Fair Housing (CPSH, 2017)
- City of Fort Worth and FWHS Notice of Public meetings (FWHS, 2018)
- Housing Channel, Meeting Notice AFH – Fort Worth (Housing Channel, 2018)
- City of Fort Worth – Assessment of Fair Housing Fillable Survey (incident monitoring reporting form, 2018)

NTRHA also cooperated with the traditional media, allowing for transparency on the project with the broader community. Outlets covering the research included:

- D Magazine – Dallas fair housing study won't be stopped (Macon, 2018)

NTRHA made substantive efforts throughout the project to engage populations that are typically underrepresented in the planning process such as persons who are limited English proficient (LEP) and persons with disabilities. NTRHA found that the most effective tools for engagement of these populations were public meetings, focus groups, consultations and surveys. The selected locations of public meetings and targets of focus groups sought to ensure that persons who lived in R/ECAPs, protected classes and low-income residents would have the opportunity to participate. The research team also leveraged relationships between members of the community and existing organizations such as those described below. Community organizations assisted NTRHA in keeping the public up-to-date on upcoming meetings and focus groups, as well as by distributing the survey through their networks.

Public Meetings

Public meetings were conducted in two rounds. The first public meetings held in 2017 were designed to present HUD data and get community input on contributing factors to barriers to fair housing. NTRHA facilitated the meetings with City and housing authority staff available to address questions. The meetings consisted of a short presentation followed by the opportunity for attendees to interact with posters, including HUD data in easy to understand maps. Researchers were spread throughout the poster area to answer questions regarding the data and gather comments. Attendees voted for the factors contributing the most to fair housing problems. (Presentation slides and posters were also posted online.)

Nine public meetings were conducted in the first round as a collaboration between the City of Fort Worth and FWHS. One meeting was scheduled in each council district and two meetings were conducted at FWHS central offices located centrally in the Butler public housing community.² Figure 2 displays the dates, times, locations, number of attendees and whether the site was within a zip code that included racially and ethnically concentrated areas of poverty (R/ECAPs). Nearly 200 persons attended public meetings. All meetings were held in physically accessible buildings. Spanish language surveys and interpreters were made available at each of the community meetings to ensure that the limited English proficiency population was supported.

² Two additional meetings were originally scheduled for far north Fort Worth, Council District 7. AFH public meetings had become confused in social media traffic with issues regarding the relocation of public housing residents of the Butler community through the RAD program. (See Facebook post in Appendix for example.) Additional meetings in far north Fort Worth were canceled when it was determined that potential community attendees misunderstood the purpose of the AFH meetings. One meeting was held in far north Fort Worth, District 4, giving the researchers the opportunity to gather information about community opposition concerning the relocation of public housing residents. Many City of Fort Worth surveys were also gathered from far north Fort Worth providing ample insight into this issue. FWHS conducted meetings with community leaders following the meeting cancellations to address issues surrounding the RAD relocation process and community opposition.

Council District	Date, Time and Location	# of Attendees	R/ECAPs
District 6	Wednesday, July 12 Chisholm Trail Community Center, 7:00-9:00 pm	16	No
District 5	Thursday, July 20 MLK Community Center, 7:00-9:00 pm	6	Yes
District 8	Monday, July 31 Bethlehem Community Center, 7:00-9:00 pm	40	Yes
District 4	Tuesday, Aug. 1 North Park YMCA, 7:00-9:00 pm	42	No
District 9	Thursday, Aug. 3 Worth Heights Community Center, 7:00-9:00 pm	20	Yes
District 2	Thursday, Aug. 10 Northside Community Center, 7:00-9:00 pm	14	Yes
District 3	Monday, Aug. 14 Como Community Center, 7:00-9:00 pm	20	Yes
FWHS	Tuesday, Aug. 15, FWHS Community Room 7:00-9:00 pm	26	Yes
	Tuesday, Aug. 29; FWHS Community Room 7:00-9:00 pm	6	

Figure 2: Public meeting locations, dates, attendees, R/ECAPs

The City of Fort Worth and FWHS worked together to publicize the public meetings. The City used an automated calling system to place telephone calls to citizens notifying them prior to each meeting in order to generate additional interest and attendance. Utilizing this service, 251,794 residents were contacted via phone. The City also communicated directly with neighborhood associations that were contacted on 15 separate occasions via the City's Community Engagement Weekly Bulletin email. Meetings were also publicized through local governmental and public service agencies, including Tarrant County, the City of Arlington and Housing Channel, a Community Housing Development Organization (CHDO). Additional automated calls and personal outreach efforts were made by the City of Fort Worth through CDBG sub-recipient social service agencies. Public meetings notices were also posted on the City of Fort Worth City Council Agenda and the City Calendar.

FWHS posted all meeting notices on its website (www.fwhs.org). Notices and flyers for public meetings were posted in the offices of FWHS and given to Housing Choice Voucher (HCV) program participants when they visited the office for required re-certifications. Letters and flyers were hand-delivered to public housing and RAD residents inviting them to the August 15 public meeting. Letters were mailed to Family Self-Sufficiency (FSS) program participants inviting them to the meeting.

- Public notices of the meetings were published in the following newspapers:

- Public Notice in La Vida News/Black Voice, June 15, 2017
- Public Notice in Fort Worth Star-Telegram, June 9, 2017
- Public Notice in La Estrella, June 17, 2017

The second round of public meetings was similar in format with a brief presentation and the opportunity to interact with posters, including HUD data maps. The goal of the second round was to get public feedback on draft FWHS goals and candidate strategies. Attendees were asked to vote on the importance of each suggested goal. Meetings were held on Feb. 21 and 27, 2018. Only seven participants attended, in part due to inclement weather on Feb. 21. Meeting attendees included representatives of the Texas Low Income Housing Information Service (state-wide advocacy group, Texas Low Income Housing Information Service, 2018), the North Fort Worth Alliance (North Fort Worth Alliance, 2018, far north Fort Worth association of individuals, neighborhood associations, etc.) and Wildwood Branch Apartments (Low Income Housing Tax Credit property, Wildwood Branch Apartments, 2018).

Persons who could not attend the public meetings were invited to contribute by filling out a survey, voting on draft jurisdiction goals through www.northtexasrha.com, calling the NTRHA office or emailing/mailling written comments to the NTRHA office.

Focus Groups

NTRHA used focus groups to gather information on targeted aspects of the AFH. Information from 10 focus groups was incorporated in this report, including meetings sponsored by the City of Fort Worth (CFW) and NTRHA/FWHS. City staff conducted all CFW focus groups. NTRHA staff designed and facilitated NTRHA-FWHS sponsored focus groups. Each focus group was targeted toward stakeholders sharing common interests in fair housing. Figure 3 displays each focus group, including date/time, sponsoring organization, target group and number of attendees. The meeting format and questions for each focus group were customized to address the interests and needs of the participants. NTRHA convened the meetings in centrally located, accessible facilities, including public libraries, churches and properties where publicly supported housing is located. NTRHA staff collaborated with the Community for Permanent Supported Housing (CPSH) to arrange a meeting that addressed the needs of persons with intellectual and development disabilities (IDD). Focus groups targeting neighborhood and homeowners association (HOA) representatives included attendees from throughout the Fort Worth community, including communities with R/ECAPs.

Date	Time	Sponsor	Target Group	Attendees
4/9/2017	3:00 PM	CFW	Developers, CHDOs, planners, advocates, government agencies engaged in affordable housing	8
5/3/2017	3:00 PM	CFW	Real estate brokers, HOA representatives, neighborhood association leaders engaged in homeownership	6
5/23/2017	9:00 AM	FWHS	FWHS participating landlords	41
6/22/2017	6:00 PM	NTRHA	Homeless persons	6
7/10/2017	5:30 PM	FWHS	Residents of FWHS publicly assisted housing, Resident Advisory Board members	6
8/9/2017	3:00 PM	FWHS	Nonprofit service providers and government agencies addressing homelessness, poverty and domestic violence with shelter, housing, emergency services, employment and health care	15
8/21/2017	6:00 PM	FWHS	Neighborhood association and HOA representatives	9
8/29/2017	5:30 PM	FWHS	Persons on a waiting list for FWHS publicly supported housing	6
9/25/2017	2:00 PM	CFW	Disability subject matter experts (ADRC, state, city organizations)	3
10/12/2017	5:00 PM	NTRHA/CPSH	Persons with disabilities and guardians	15

Figure 3: Focus groups benefitting FWHS AFH, including date, sponsor, target group and number of attendees

More than 110 persons participated in focus groups. The following methods were used to recruit participants:

- Focus group participants were recruited by the CFW and FWHS from the target groups with personal emails and flyers.
- Letters were mailed to applicants to the HCV program (waiting list) and recently relocated HCV program participants to attend the targeted focus group held prior to the public meeting Aug. 29.
- Emails were sent to all registered neighborhood associations inviting them to the targeted focus group Aug. 12.
- Emails were sent and telephone calls made to Resident Advisory Committee members inviting them to the targeted focus group July 10.
- Emails were sent to service provider organizations inviting them to the targeted focus group Aug. 9.
- The AFH FWHS landlord focus group was included within the agenda of a regularly scheduled landlord meeting May 23.
- An FWHS vice president who is a member of the local apartment association recruited for AFH technical advisors at a regular meeting.
- The CPSH used its database of emails and partner organizations and its website to reach advocacy organizations and service providers for persons with all types of disabilities.

Consultations and information gathering

Consultations (interviews, meetings, tours) were conducted with key informants and subject matter experts to strengthen the understanding of the realities of barriers to housing in the jurisdiction and to identify best practices. NTRHA researchers attended public and private meetings and events in the jurisdiction as well as state and regional conferences related to fair housing issues, including housing affordability, community opposition, race and culture, neighborhood revitalization, transportation and economic development. Figure 6 (see Section 2 below) lists the organizations consulted, attendees and topics discussed. Over 70 meetings with 50 organizations explored different aspects of access to housing and opportunity, including public policy, research, race, gender, neighborhood impact and revitalization, homelessness, food, civil rights, healthcare, education, transportation, economic development, philanthropy, insurance, residential real estate property management and development and planning. NTRHA also formed a Technical Advisory Board of subject matter experts, service providers and advocates that met with the researchers twice to a) review the research plan and identify issues and b) to review and provide feedback on draft goals for the region.

Surveys

NTRHA used two survey approaches to analyze fair housing issues for the jurisdiction of FWHS. The CFW posted a survey, based on the AFH tool, on its website from April 2017 through October 2017 that received 1,604 responses. A copy of the CFW survey and summary charts are attached in the Appendix. The NTRHA used the results of the CFW survey, including comments, in its assessment of contributing factors. Survey participants included 207 black (13%) and 171 Hispanic (11%) respondents. Approximately 395 respondents were persons with a disability or had a family member with a disability (25%). Respondents were geographically spread throughout the City. Figure 4 shows the percent of CFW surveys received from each major geographic area. More than 30% of the CFW surveys were received from persons living in the central city where most of the jurisdiction's R/ECAPs are located. The largest portion of the surveys came from far north Fort Worth (40%).

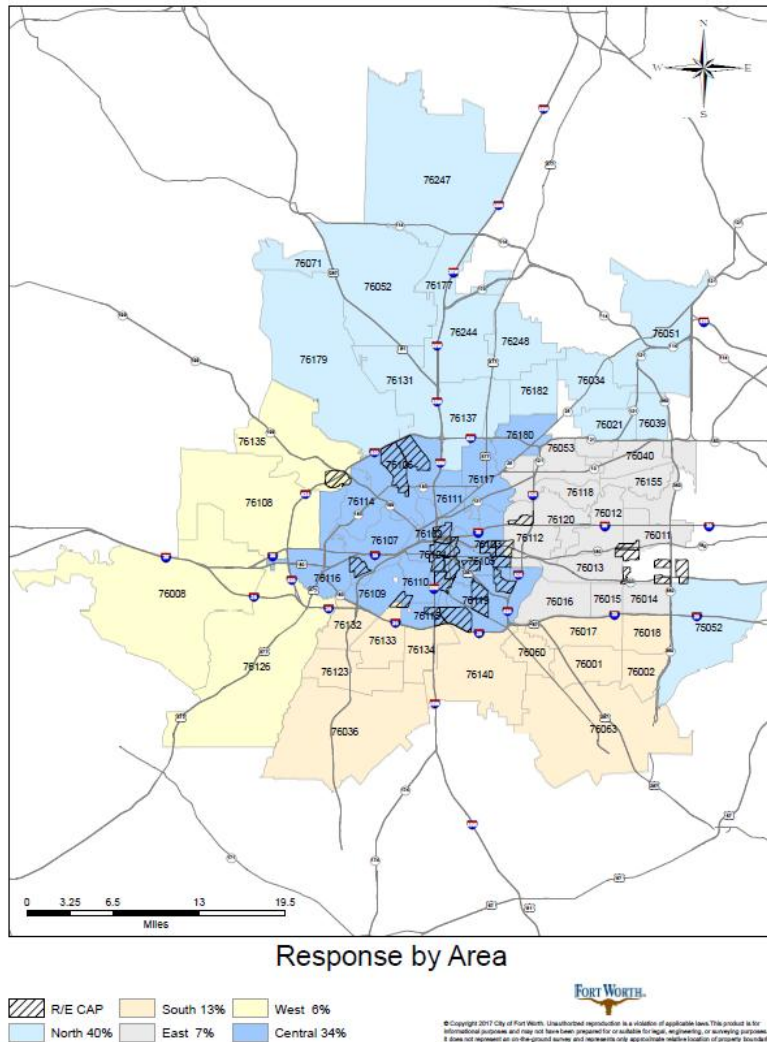


Figure 4: CFW survey responses by geographic area, percent of total

NTRHA administered a separate survey at public engagement events designed to ascertain needs for access to opportunity by different demographic groups. Most of the survey respondents were attendees at NTRHA public engagement events. The survey was also posted on-line but received relatively few responses. NTRHA surveys were completed by 157 participants from FWHS public engagement events and on-line at the NTRHA website.

Figure 5 lists the number of surveys completed by zip code. Over half of the surveys were completed by participants in the central city and in areas where R/ECAPs are located (76102, 76119, 76104, 76105, 76112, 76107, 76123 and 76107). One survey each was received from 15 other zip codes, including participants from the cities of Irving, Arlington, Aledo, Boyd, Euless, Grapevine and North Richland Hills.

Zip Codes	City	Total
76102	Fort Worth	16
76119	Fort Worth	14
76104	Fort Worth	13
76105	Fort Worth	12
76244	Keller	12
76112	Fort Worth	10
76123	Fort Worth	9
76107	Fort Worth	8
76134	Fort Worth	8
76133	Fort Worth	6
76164	Fort Worth	6
76116	Fort Worth	5
76137	Fort Worth	5
76110	Fort Worth	4
76111	Fort Worth	4
76036	Crowley	3
76120	Fort Worth	3
76106	Fort Worth	2
76132	Fort Worth	2
Other	Other	15

Figure 5: Number of surveys completed by zip code, FWHS jurisdiction

Other communications strategies

NTRHA welcomed written comments mailed to NTRHA headquarters as well as any comments left on voicemail. The public did not regularly utilize these tools. NTRHA representatives responded to all comments in the mode of communication in which they were received. NTRHA staff also responded to comments and questions received at the NTRHA email address, afh.uta@gmail.com.

Summary

Outreach strategies successfully reached lower income areas with higher concentrations of racial and ethnic minorities including R/ECAPs. Focus groups were very effective in engaging members of protected classes, their advocates and service providers. Participants included residents in publicly supported housing, persons with disabilities, racial and ethnic minorities, seniors and LEP residents. The researchers effectively used their contacts in the community to

consult with subject matter experts and participate in relevant public events that addressed issues relating to housing, race and ethnicity and challenges faced by persons with disabilities.

2

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

Figure 6 displays the organizations consulted during the AFH community participation process, including dates of meetings or events, organization name, principal attendees and the event purpose or primary topic discussed. Figure 7 lists the members of the NTRHA Technical Advisory Board, including the organizations represented.

Date	Organization	Attendees	Event/Topic
2/21/2017	Center for Public Policy Priorities	Frances Deviney, Director of Research	Meeting to discuss available research on women's issues and access to opportunity
9/21/2017	Center for Public Policy Priorities	Dick Lavine, Senior Researcher	Interview to discuss policy to address rising property taxes and housing affordability issues
6/9/2017	Center for Public Policy Priorities; Center for Social Inclusion	Steven Murdock, Rice University, former Texas State Demographer and head of 2010 US Census; Simran Noor, Vice President, Center for Social Inclusion	Board meeting/presentation
10/24/2017	Center for Transforming Lives	Carole Klocek, CEO; Elaine Klos, Board Chair, MHMR and chair, early child homelessness task force	Discuss initiative to address early child homelessness
10/10/2017	Center for Transforming Lives	Carole Klocek, CEO	Discuss challenges in housing for formerly homeless and low-income women and families
5/13/2017	CFW	Residents, affordable housing providers, City staff, real estate brokers and developers	Affordable Housing 101 Workshop
3/9/2017	CFW	Tara Perez, Manager, Directions Home	Meeting to discuss incentives for development of permanent supported housing
5/18/2017	CFW	Fernando Costa, Assistant City Manager; Tara Perez, Mgr. Directions Home	Meeting to discuss approaches to permanent supported housing
1/4/2018	CFW	Bidders, affordable housing and homeless service providers	Discuss CFW request for proposal for permanent supported housing projects
10/5/2017	CFW	CFW Staff, Foundation Directors	Discuss strategies for public/private partnerships to create supportive housing for people emerging from homelessness
2/2/2018	CFW	Tara Perez, Directions Home; Jason Hall, FNMAE; Tom Purvis, Real Estate finance; Tammy McGhee, ED Tarrant County Homeless Coalition; Marti Lawrence, Arlington Life Shelter; Dr. James Petrovich, Texas Christian University; James Lawrence, Architect	Discuss FNMAE RFP and possible candidate projects, including landlord retention, supported employment
2/5/2018	CFW	Barbara Asbury, Compliance and Planning Manager	Discuss structure of possible RFP for very low income affordable housing with city incentives/CDBG/HOME funds
10/13/2017	CFW Neighborhood Services	Catherine Huckaby, Community Engagement Manager	Interview discussing community opposition to affordable housing

Date	Organization	Attendees	Event/Topic
11/11/2017	CFW/FW Metropolitan Black Chamber of Commerce	Representatives of minority community organizations and businesses	Community Conversation on Race & Culture focus group
10/24/2017	CFW/United Way of Tarrant County	Homeowners, residents, service providers	Las Vegas Trail Initiative public meeting addressing community deterioration
11/13/2017	CFW/United Way of Tarrant County	Residents of Las Vegas Trail neighborhood, service providers	Discuss needs for community revitalization
3/8/2018	City Square	Dr. John Siburt, President; CFW council members, FW homeless shelter directors, affordable housing advocates	Tour of Opportunity Center and tiny home development, discussion of affordable housing programs and challenges
8/23/2017	Community for Permanent Supported Housing	Robin LeoGrande, President	Meeting to discuss challenges in housing access by persons with disabilities
3/30/2017	Criterion Development Partners	Pretlow Riddick, Partner	Interview discussing barriers to construction of affordable housing
3/6/2017	Dallas Women's Foundation	Dena Jackson, Director, Programs and Research	Interview discussing research on housing and economic development issues for women
2/9/2017	Dallas Women's Foundation	Roslyn Dawson Thompson, President & CEO	Discuss release of Women's Economic Issues Report
8/3/2017	Disability Rights Texas	Rachel Cohen-Miller, Attorney; Christopher McGreal, Attorney	Discuss state and municipal policies relating to fair housing for persons with disabilities
2/2/2018	DRC Solutions	Mayor Betsy Price, CFW; Selarstean Mitchell, FWHS; Bruce Frankel, DRC Solutions; public attendees	Breakfast with the Mayor event/panel discussion on permanent supported housing
7/13/2017	DRC Solutions	Patricia Ward, Tarrant County Community Development and Housing Dept., Director; Selarstean Mitchell, Vice President, FWHS; Bruce Frankel, DRC Executive Director; DRC board members	Discuss planning for development of supported housing development
8/1/2017	DRC Solutions	Betty Dillard, community volunteer	Tour apartments in R/ECAP and discuss neighborhood impact
6/1/2017	DRC Solutions/Center for Nonprofit Management	Bruce Frankel, DRC Executive Director; Kyras Brown, Consultant, CNM Connect	Meeting to discuss metrics for permanent supported housing
6/20/17	Fort Worth City Council	Cary Moon, CFW Council member	Meeting to discuss impact of affordable and supported housing
6/6/17	Fort Worth City Council	Council members of sub-committee on Housing and Neighborhood Services	Discuss AFH process and strategies

Date	Organization	Attendees	Event/Topic
2/3/2017	Fort Worth Rotary International	Presentation by Leg Up staff	Discuss job training program for persons emerging from homelessness
5/18/2017	FWHS	Board of Trustees	Board meeting
3/3/2017	FWISD	Tracy Marshall, senior officer, Grants and Development	Interview discussing school performance research and policy
10/9/2017	Gateway Planning	Brad Lonberger, principal	Interview discussing planning and zoning strategies to address segregation and housing access
6/1/2017	Guardianship Services	Lyn Scott, Executive Director	Meeting to discuss programs available to support very-low-income persons with disabilities in housing
4/27/2017	Hap Baggett Properties	Hap Baggett, Principal	Discuss issues of affordable housing development and neighborhood revitalization
3/1/2018	Housing Channel (CHDO)	Donna VanNess, President	Discuss affordable housing projects
2/9/2018	HousingWorks Austin/Federal Reserve Bank of Dallas	Steve Adler, Mayor of Austin; Judge Sarah Eckhardt, Travis County; Rolf Pendall, Urban Institute; other researchers, advocates	Housing + Economic Opportunity Summit (conference)
7/14/17	HUD	Beth Van Duyne, Regional Administrator	Meeting to discuss barriers to affordable housing and strategies for permanent supported housing
3/23/2017	Inclusive Communities Project	Demetria McCain, President; Elizabeth Julian, Treasurer; Michael Daniel, attorney; other staff	Meeting discussing AFH process and barriers to housing
5/15/2017	Kilpatrick Insurance	Kim Kilpatrick-Terrell, CEO and landlord	Interview discussing impact of insurance costs on housing and experience as landlord with publicly assisted housing
3/3/2017	Marcus & Millichap	Mark and Devan Allen, Real Estate Brokers	Tour apartment in R/ECAP and discuss challenges of very-low-income housing development and maintenance
10/24/2017	MHMR Tarrant County	Susan Garnett, CEO; Elaine Klos, board chair; Luke Reynard, Chief of Disability Services	Discuss housing challenges facing persons with disabilities and resources available
9/19/2017	MHMR Tarrant County	Elaine Klos, Board Chair	Discuss barriers to affordable housing for children
7/16/2017	National Association of Housing and Redevelopment Officials	Subject matter experts from industry and academia, public housing authority executives	Annual Summer Conference focusing on best practices in managing affordable housing
2/28/2018	National Low Income Housing Information Service	Adam Pirtle, Northwest Texas Director	Discuss AFH data, process, goals

Date	Organization	Attendees	Event/Topic
3/22/2017	Neighborhoods of East Fort Worth	Fred Fernandez, President, and officers	Meeting discussing neighborhood problems related to publicly assisted housing and homelessness
4/8/2017	Neighborhoods of East Fort Worth	Neighborhood association presidents	Discuss problems related to low income housing and strategies for increasing affordable housing
5/30/2017	Neighborhoods of East Fort Worth	CFW neighborhood staff, CFW Police, housing authority staff, neighborhood leaders, apartment managers	Called meeting to discuss problems with apartments including crime and trash
6/21/2017	Near East Side Neighborhood Association	Members	Discuss problems in R/ECAP with high homelessness, including crime control
3/20/2017	North Texas Community Foundation	Nancy Jones, Executive Director; Rose Bradshaw, Director of Programs	Discuss the AFH and foundation roles in affordable housing
9/7/2017	Oak Ridge Apartments	Owner/Manager	Discuss barriers to landlord participation in HCV program
1/31/2017	Palm Tree Apartments	Residents	Discuss factors for successful housing of formerly unsheltered homeless persons
5/11/2017	Presbyterian Night Shelter	Toby Owen, Executive Director	Discuss strategies and barriers to housing for homeless persons
2/16/2017	Recovery Resource Council	Eric Niedermayer, Executive Director	Discuss housing for persons with addiction disorders
4/26/2017	Ryan Foundation	John Ryan, Founder	Meeting to discuss role of philanthropy in developing permanent supportive housing
12/11/2017	Ryanwood Neighborhood Association	Members, regular meeting	Discuss affordable housing and housing for homeless
5/1/2017	Ryanwood Neighborhood Association	Olivia Duke (resident organizer); CFW Police Dept. staff; CFW Code Enforcement staff; housing authority representatives; neighborhood association members; residents	Meeting to discuss neighborhood problems related to low-income housing
3/9/2018	SafeHaven of Tarrant County	Tracy Rector, Board Chair	Discuss housing needs and barriers of domestic violence victims and housing solutions
2/28/2017	Samaritan House	Norbert White, Executive Director	Discuss effectiveness of housing for homeless persons
2/15/2017	Tarrant Area Food Bank	Barbara Ewen, Manager	Meeting discussing food access for very-low-income residents
4/18/2017	Tarrant Area Food Bank	DRC staff, TAFB Community Gardening staff	Tour garden and discuss role of community gardens in neighborhoods
8/1/2017	Tarrant County College	Louise Appleman, Trustee; David Connor, Chancellor	Meeting to discuss issues of students who are homeless

Date	Organization	Attendees	Topic/Event
1/26/2017	Tarrant County Homeless Coalition	Volunteers	Annual Homeless Count
9/8/2017	Tarrant County Homeless Coalition	Continuum of Care Community Projects Review Committee	Meeting to select projects for funding to address homelessness
11/6/2017	Tarrant County Homeless Coalition	Lauren King, Development Director; Devan Allen, board member	Discuss affordable housing challenges and strategies for homeless people
2/6/2018	Tarrant County Homeless Coalition	Tammy McGhee, Executive Director	Discuss strategies to increase access to housing and health-care for persons who are homeless
8/19/2017	Texas A&M School of Law	Luz Herrera, Professor; law students	Class discussion of FW demographics, poverty, barriers to housing
6/22/2017	Texas Christian University	Dr. James Petrovich, School of Social Work	Meeting to review results of study of residents in permanent supported housing
5/19/2017	Texas Civil Rights Project	Wallis Nader, Attorney	Meeting to discuss impact of probation fees on housing affordability
10/30/2017	Texas Legislature	State Rep. Eric Johnson and staff	Interview discussing recent legislative strategies to address affordable housing
9/19/2017	The T (Fort Worth Transportation Authority)	Phil Dupler, Sr. Planner, Curvie Hawkins, Planning Director	Meeting to discuss access to transit and barriers to housing and opportunity
6/21/2017	United Way of Tarrant County	Community Volunteers from GM Financial and others	Corporate Day of Caring - discussion of homelessness
2/23/2017	United Way of Tarrant County	Nonprofit service providers, government agencies, business leaders	Economic Development Summit
27-Jun-17	United Way of Tarrant County	Victoria Walton, Director, Volunteer Services	Discuss volunteer role in supporting persons emerging from homelessness
8/2/2017	University of Kansas	Dr. Kirk McClure, researcher, Mid-America Regional Council/AFH, professor, University of Kansas	Meeting to discuss strategies for analyzing voucher use and regional management of HCVs
3/22/2017	University of North Texas Health Science Center	Dr. Emily Spence-Almaguer, Associate Dean Community Engagement	Meeting discussing behavioral health-care for persons in permanent supported housing
10/27/2017	Women's Policy Forum	Women leaders in business and nonprofit sectors	Discuss economic challenges facing women and families

Figure 6: List of subject matter experts and key informants consulted during the AFH process

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

Figure 7: Members of NTRHA Technical Advisory Board

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

Effectiveness of Outreach Activities

Community participation (number of people engaged) achieved average industry standards for an assessment of this size, while exceeding standards for impact. NTRHA incorporated all input in meaningful ways by fitting the public participation strategy to each stage of the project and using experience to inform data gathering in later stages.

NTRHA appropriately leveraged existing local knowledge and relationships to maximize community outreach by incorporating the suggestions of staff from FWHS, CFW, industry experts and community leaders for publicity of public meetings and organization of focus groups. NTRHA is confident that the insights captured through public participation efforts are representative of the diversity found throughout the region and the FWHS jurisdiction.

Surveys proved to be a useful tool for widespread input and were distributed at community events and public places as well as through established modes of communications and networks. Individuals could participate on their terms rather than attending a meeting at a specific time and place to give input. The comments gathered in the survey were insightful and NTRHA incorporated them into the analysis of the barriers to fair housing.

The first round of public meetings and targeted focus groups represented the most fruitful engagement methods. The first round of public meetings presented the HUD data and obtained community input on contributing factors to barriers to fair housing. The meetings attracted standard levels of attendance and the rooms were filled with members of the community eager to engage with the data and talk about their experiences with housing in the region.

Focus groups, organized with the input of local community organizations, were successful because they engaged key populations with diverse experiences throughout the community. Individual focus groups were organized to specifically include seniors, persons with disabilities and other protected classes.

NTRHA received comments and questions regarding the public participation process and notification strategy throughout the public participation process. NTRHA prioritized outreach strategies to maximize reach and widen the possibility of diverse input, within its constraints. **NTRHA made every effort to include all populations, neighborhoods and other groups in the process. None were intentionally excluded. NTRHA continuously addressed gaps by adjusting outreach strategy.** Additional steps to improve or increase community participation in the future could improve overall participation and participation among specific protected class groups.

NTRHA experimented with scheduling focus groups directly in the community while the public meetings were underway, without success. NTRHA found that it was much more effective to recruit through its client organizations, partner with other community organizations or leverage existing meetings where a housing focus group could be added to the agenda. This approach also allowed the research team to engage with stakeholders not typically considered in housing analysis. For example, the focus group conducted in partnership with the Community for Permanent Supported Housing involved many participants who might not normally be comfortable participating in a discussion group that was not designed with their needs in mind.

Strategies to Improve Community Participation

NTRHA developed online polling to gather feedback and allow respondents to participate in voting on the importance of each suggested goal to maximize meaningful community input when attendance was low at public meetings. There was little engagement in online polling, which the research team suspects could be the result of the difficulties inherent in providing a clear written explanation online that allowed the community to vote with confidence. Budget and time constraints did not allow the presentations to be videotaped and placed online, but doing so in future efforts would give community members a common vocabulary and base of knowledge that would allow for increased participation in the online polling platform.

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

The second round of public meetings was not as well attended as the first, although the meetings were publicized through the same traditional media outlets, social media, printed flyers and community organizations. NTRHA also communicated with individuals who expressed interest in updates on the research by using email addresses obtained from focus group/public meeting sign-in sheets, surveys and any written comments to recruit for second-round meetings. Low attendance could be attributed to the fact that the first round of public meetings was in the

summer and the second-round was in the winter. North Texas experienced unprecedented rain and near freezing temperatures in February 2018, making it difficult for some individuals to leave home and travel to a public meeting. Another reason could be that all interested parties felt that they had already given sufficient input. In the future, this could be remedied by more accurately explaining the difference in the public meetings.

In all, while participation numbers ebbed and flowed, NTRHA is pleased with the quality of engagement during the entire process. Community members were invited regularly to share insight that had tremendous impact on the research and comments were incorporated into not only the final report but also informed subsequent phases of the project. The research team was responsive to the communications needs of the community and adapted the public participation strategy as it identified issues and shortcomings.

4

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

NTRHA engaged the public throughout the research and reporting process, eliciting a substantial body of input that was both qualitative and quantitative in nature. NTRHA specifically designed the public participation strategy to maximize responsiveness to the phase of the research in which it was gathered, so that it continually informed the process and shaped later engagement and research efforts.

NTRHA designed the first phase of public participation to gather public insight on HUD data and the realities of housing in the community. Community members also were asked to comment on the contributing factors to barriers to fair housing.

Qualitative data was collected through public meetings, demand-side focus groups, supply-side focus groups and consultations. These results directly informed the contributing factors to barriers to fair housing.³ UTA researchers took notes at each public event and consultation and conducted qualitative analysis using Dedoose software for coding and summarization (Sociocultural Research Consultants, LLC, 2018). All data was analyzed and sorted into the seven issue areas and associated contributing factors provided by the AFH tool. Comments were sorted based first on their context, i.e. the question or material provided by the researcher and second by the contributing factor to which they related. Results of the CFW Survey were incorporated in the summary below, based on the City's analysis in its published AFH draft (City of Fort Worth, 2017). Comments from NTRHA public engagement events and the CFW survey are used throughout this report to illustrate findings, especially in reporting contributing factors to fair housing issues. The NTRHA survey results were analyzed separately and are summarized in this section. The following is a summary of comments received through public engagement events and surveys. The summary example comments under each header

Contributing Factors to Segregation

- Private discrimination
 - Racism is a problem

³ Additional quantitative data was collected at public meetings via "voting boards" designed to prioritize contributing factors to fair housing issues. Results are discussed under Section VI. Goals and Priorities, Question 1. Quantitative analysis of the comments received also informed the development of priorities among fair housing issues and is also included under Section VI. Question 1.

- There are thoughts about your demographic and the type of neighborhoods you may live in
- The burden of the poor and disadvantaged is shifted to the poorer neighborhoods where people of color live
- The community is highly segregated
 - Real estate agents encourage segregation – only black people are brought to our neighborhood
 - Builders target their developments by ethnicity/race
- The community is well-integrated
 - My neighborhood is ethnically diverse. Unaware of barriers to homeownership in our area

R/ECAPs

- Lack of investment in specific neighborhoods
 - Lack of investment in neighborhoods on the east side of Fort Worth to address crime, illegal drug use, squatters on vacant property, lack of property maintenance (especially vacant properties).
 - Trash cans stolen, prostitution, murder, public spaces not mowed
 - Lots of abandoned properties, including hotels that need to be torn down
 - Central city communities have been neglected for decades, all resources being invested on the edge of the city
 - Lack of private investment in retail and services in east Fort Worth
 - Grocery stores won't locate here due to crime
 - High cost of infrastructure improvement to develop within the central city
 - Need for improved apartments, community center and supervised activities for youth in the Las Vegas Trail community
- Location, type, loss of affordable housing
 - Many barriers to development of diverse housing types, including financing
 - Need more mixed-income housing
 - Land costs and impact fees are too high, based on unrealistic valuations
 - Gentrification is a problem
 - Need to preserve existing housing – fix what we have
 - Rents go up after landlords improve properties
 - Incoming residents drive up housing costs for all
 - Area is becoming less diverse as it develops
 - Wages are too low to afford the housing available in high-opportunity areas
 - Need decent, safe, sanitary housing where you work
 - Day labor companies don't pay living wage
- Discrimination
 - Many oppose development or increase of affordable housing in their communities, especially in far north Fort Worth
 - We don't have the public transportation, services and employment opportunities for low-income residents
 - We don't have a food stamp office, public hospital, VA, buses
 - Affordable housing will over-crowd our schools and strain public services, especially police
 - Don't bring the most dangerous district (8) to the safest (7)

- Property values will decrease in response to addition of affordable housing, public transit
 - Affordable housing will drive developers away
- It's not fair for someone to be able to live here who can't afford it when I have earned the money to pay for it
- Some welcome the integration of affordable housing

Contributing Factors to Barriers to Access to Opportunity

- High housing costs, lack of affordable housing in high-opportunity areas
 - Affordable housing only available in higher crime areas
 - Safe, well-made housing unaffordable for majority
 - Hard for me to find a place I think is safe enough for me and my child
 - Affordable housing contributes to neighborhood deterioration
 - Has been shown that where affordable housing goes, crime rates go up
 - Unable to find affordable housing in desirable areas
 - If you're not a double-income family you can't afford to buy
 - We need more affordable low-income housing with access to public transportation in safer neighborhoods
 - Housing in desirable areas is too large and expensive
 - Takes 3 or 4 people together to rent a house, always in low-income areas
 - No small, starter homes
 - I have too much student loan debt to ever afford to buy a home
 - Older homes require too much repair to be affordable
 - Residents are competing with investors for residential property, driving up prices
 - Gentrification making housing unaffordable, including property taxes
 - Many new apartments being built but not affordable to low-income people
 - Need more mixed-income, affordable housing throughout the city
 - Should require affordable housing to get incentives (developers)
 - High-opportunity areas have limited services, supports for low-income people
- Public transportation
 - Public transit doesn't effectively connect people to opportunities for employment
 - Bus line doesn't go to where and when the good jobs are from where low-income people live
 - No transit in the evening
 - Residents of east Fort Worth can't get to jobs at Alliance Airport or Arlington
 - Public transit system is convoluted – takes too many transfers to get anywhere
 - No service on Sunday
 - Low-income housing without public transit is a prison
 - No transit to the suburbs
- Access to proficient public schools
 - Schools are underfunded and over-crowded
 - Neighbors are sending their kids to private schools
 - Proficient schools aren't available to all because of lack of affordable housing and school boundary lines
 - Schools need help in the Las Vegas Trail area – high class sizes, students with special needs, illiterate students, no school supplies, kids are starving

Contributing Factors to Disproportionate Housing Needs

- Economic pressures affecting low-income people
 - Increasing property values/taxes making homeownership unaffordable and driving up rents
 - Unaffordable home and rental prices, rapidly rising rents
 - Investors pushing up prices and eliminating previously affordable housing
 - Barriers to homeownership, including difficulty obtaining a mortgage or funds for down payment
 - Tight rental market driving up rents
 - New construction product types directed at upper middle and upper income households and not households needing smaller or less expensive units
- Physical housing problems affecting low-income people
 - Poor condition of older housing stock, lack of maintenance and repair
 - Seller's market – sellers don't make needed repairs prior to sale
 - Landlords/owners failing to maintain property in affordable housing
- Lack of public investments in low-income communities
 - Lack of police protection, rising crime rates, perceptions of lack of safety adjacent to affordable housing

Contributing Factors to Issues with Publicly Supported Housing

- Community opposition creates lack of access to housing in high-opportunity areas
 - Opposition based on belief that affordable housing is associated with:
 - Increased crime
 - Poor property management, maintenance, deteriorating properties
 - Strained community infrastructure (schools, roads)
 - Reduced property values
- Site selection procedures
 - Rely too much on neighborhood and elected official approval
 - Insufficiently transparent
- Source of income discrimination
- Lack of access to information about affordable housing programs and supports:
 - How to access age-based property tax reductions
 - How to learn about subsidized housing programs
 - How to access programs to support low-income homeowners
- Lack of investment in neighborhoods where publicly supported housing is located

Contributing Factors to Issues for Persons with Disabilities

- Lack of access to transit
 - Ride times are excessively long on shared ride para-transit (MITS)
 - Para-transit service is not reliable or customer-friendly
 - Public transit vehicles do not have spaces that fit modern wheelchairs, especially those that are electrically operated and have additional adaptive equipment; not enough space for multiple wheelchairs
 - Most cities within Tarrant County can't afford to participate in the transit authority
 - Para-transit services provided by nonprofits aren't sufficient to fill gaps in MITS service

- Transit services provided by public schools are great but end just when young people need them to become independent and employed, especially after their guardians pass away
- Limited access to transportation for food shopping for seniors
- Para-transit is limited by a lack of drivers
- Para-transit fees (MITS) have doubled, costing \$4 per trip one way – too much
- Lack of affordable in-home and community-based supportive services
 - Many people with disabilities require in-home services, including 24-hour live-in
 - Caregivers are paid only \$8 to \$9 per hour making it difficult to recruit and retain qualified staff for in-home assistance
 - Group homes provide inadequate levels of service, including limitations on independence and the ability to participate in activities in the community
 - Assisted living communities start at \$3,500 per month, far above the income of persons living on SSI and SSDI
 - What we need is a village within the larger community where we can help each other and share supportive services
 - Need to maintain housing and independence: medical support, especially in-home or community monitoring for emergencies; supervision for safety; assistance to get out of bed, dress and prepare to leave the home for employment or other community activities; day activity programs to prevent isolation and support community integration; legal support and guardianship-type services that enable supported decision-making and choice
 - Texas Medicaid waiver programs do not provide sufficient supportive services
- Inaccessible public and private infrastructure
 - Handicapped parking spaces do not fit modern van ramps
 - Most single-family neighborhoods not designed for walkability (no sidewalks) and that impacts people with disabilities and those aging in place
 - Side streets largely inaccessible
 - Downtown Fort Worth, Magnolia Street bars and restaurants don't provide enough space between tables for a walker or a wheelchair to pass
 - Not enough accessible public bathrooms – often used by people who don't need them
 - Sidewalks, crosswalks, crossing signals inaccessible and bar access to transit stops
- Lack of affordable, accessible housing in a range of sizes
 - Lack of housing that allows persons with disabilities to live together with their families in the community
 - Emergency shelters lack sufficient, accessible facilities that allow families to stay together
 - Persons with disabilities have incomes of \$735 to \$1,000 per month – no housing available that is affordable at these incomes (\$300 to \$400 per month)
 - We have looked and nothing meets our needs
 - LIHTC properties are not being built with enough accessible units
 - Group homes require residents to share bedrooms (no privacy), and many rooms are not big enough for persons with wheelchairs and other adaptive equipment
 - Persons with disabilities often suffer from job loss and loss of income creating barriers to affordability; my son was bullied and had to quit; not enough

- companies are willing to make accommodations; too many jobs for persons with disabilities pay piece rate that tops out at minimum wage
 - o Even with a “gifted” home, persons with disabilities unable to afford property taxes and maintenance
 - o I have only \$135 per month to live on (from my disability check) after I pay my rent
- Lack of assistance for housing accessibility modifications
 - o People don’t know how to go about requesting modifications
 - o Waiting list to get a ramp built by a nonprofit is one year
- Access to publicly-supported housing for persons with disabilities
 - o Assisted living facilities have rules that prevent family members from living with persons with disabilities for support
 - o Very difficult to get into housing programs
 - o Funding cuts keep supply below the need
 - o When housing subsidy becomes available (voucher), there are no accessible units located near services or adjacent to public transit
 - o For some with Social Security and VA benefits, income may be too high to qualify for housing program but too low to afford market rate housing
 - o LIHTC restricted rents are too high to be affordable for people on SSI, SSDI – rents are \$700 per month and landlords require double or triple deposits – rents below \$700 have one- to two-year waiting lists
- Access to proficient schools
 - o Need more post-secondary schools, programs that provide job training for persons with disabilities, including intellectual and developmental disabilities (IDD)
 - o Need more supportive services on campuses for persons with disabilities
 - o Public school class sizes were too large for our daughter, and their expectations were too low
- Lack of affordable, integrated housing for individuals who need supportive services
 - o While community integration is preferred, it can be isolating – hard to find other people with disabilities to interact with – need services and supports to overcome isolation
 - o Don’t want to have to live in a nursing home when I can be independent just because I can’t find affordable housing
 - o Many nursing homes will not accept patients who are ventilator dependent, forcing them to move out of their home community – home-based community care more desirable and effective
- Lack of assistance for transitioning from institutional settings to integrated housing
 - o You have to have accessible, affordable housing to transition to that can support the adaptive and supportive equipment you need – tough to find
- Inaccessible government facilities or services
 - o Parking spaces at City Hall and other public facilities don’t fit a seven-foot van ramp – have to use two parking spaces
 - o Insufficient handicapped parking spaces around City Hall
 - o New public coliseum is being built for 18- to 35-year-olds without disabilities
 - o Lack of accessible community centers, especially in east and northeast Tarrant County; need more recreational opportunities
 - o Can get positive responses to requests for accommodations or accessible programs in public facilities but it takes a long time and a lot of activism
- Lending discrimination

- Too hard to get mortgage when you have limited stable income from wages or salaries

NTRHA Survey responses

The following charts summarize the results of surveys received from participants at FWHS public meetings and focus groups and residents of the jurisdiction of FWHS completing surveys on line⁴.

Respondents ranked four types of housing needs from 1 to 5 with 1 indicating most important and 5 indicating the least important. Not all need types received a rank from every respondent. Figure 8 shows that housing affordability received the greatest number of responses (131) and Figure 9 shows it also received the greatest proportion of rankings (73%) of most important. Housing quality received the next most responses (113) and the next highest proportion of rankings as most important (44%).

Most important housing needs	Total responses
Housing Affordability (monthly cost)	131
Housing Availability (range of unit size)	104
Special Accommodations (disability)	96
Housing Quality	113
Other	37

Figure 8: Number of total responses for each housing need alternative

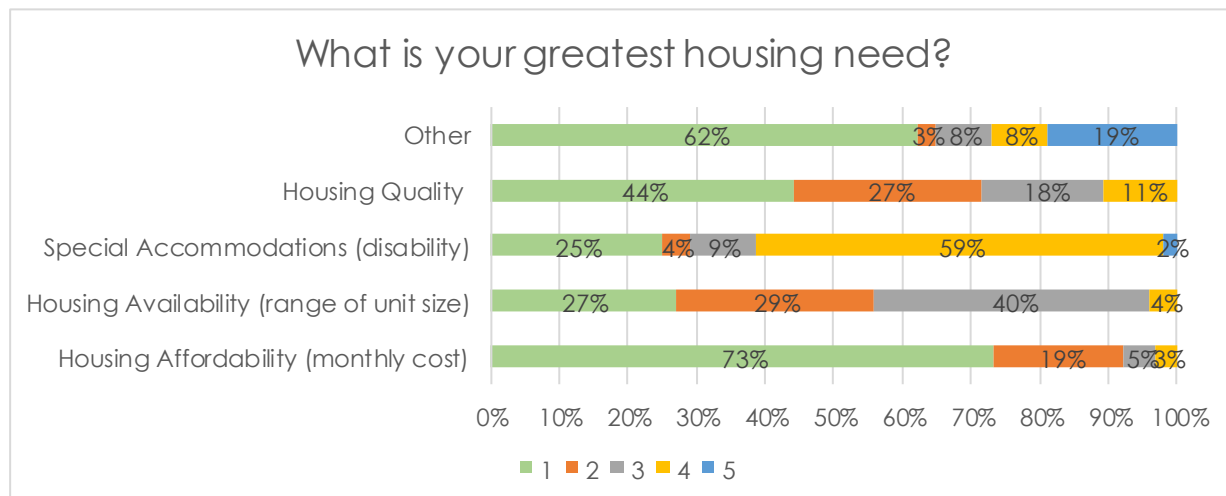


Figure 9: Housing need responses by rank, 1=most important, 5=least important

Respondents were asked to rate their satisfaction with their current housing situation on a scale from 1 to 5 with 1 indicating that they were very satisfied and 5 indicating that they were not at all satisfied. Figure 10 displays the number and percent of responses for each level of satisfaction. Thirty-one percent of respondents said they were very satisfied with their current housing situation while 46% rated their satisfaction 3 or below.

⁴ All responses are included in the appendix. Some questions are not reported here due to very low response rates.

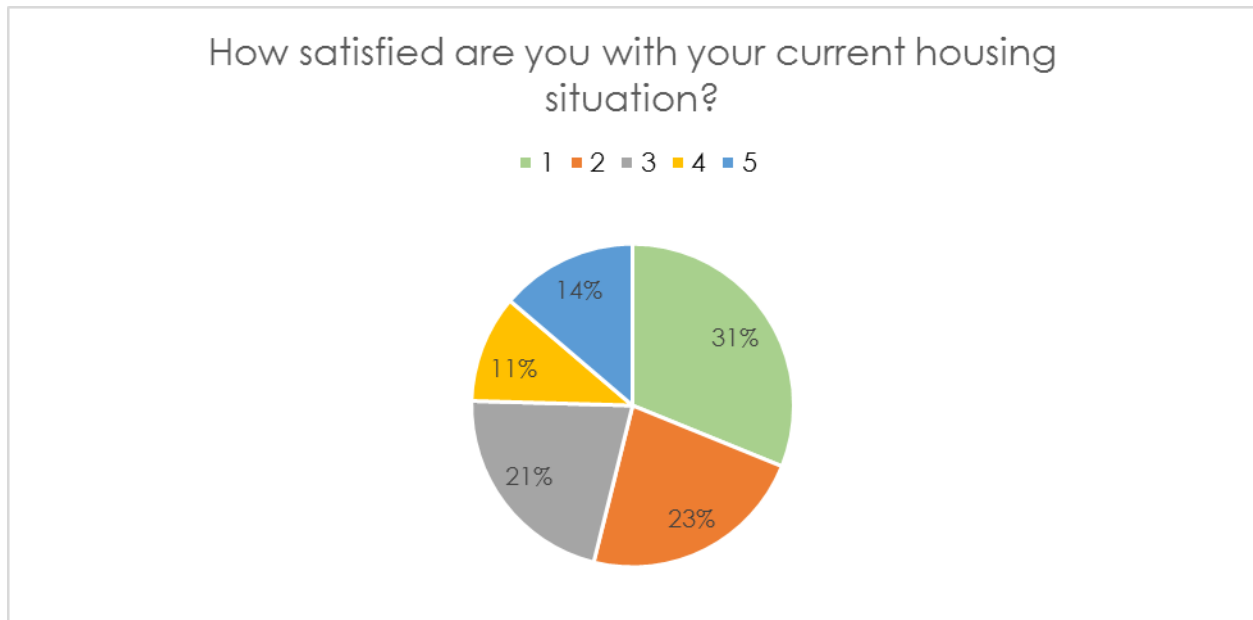


Figure 10: Number and percent of responses, satisfaction with housing, 1=very satisfied, 5=not at all satisfied

Respondents ranked characteristics of public transportation from 1, indicating most important, to 6 indicating least important. Respondents included transit users and non-users and did not necessarily rank every transportation characteristic. Figure 11 displays total responses and responses of transit users. Affordability was most frequently ranked as most important. Reliability ranked second in importance for users and non-users.

Transit Features Valued	Total responses	Transit Users	
Affordability	78	54	69%
Reliability	75	47	63%
Accessibility near house and work	3	2	67%
Areas serviced	72	42	58%
Hours of services	75	38	51%
Time to reach destinations	72	41	57%

Figure 11: Number of responses per transportation feature and number/percent reporting transit use

Figure 12 displays, for each transportation characteristic, the distribution of relative importance. Affordability and reliability were each ranked important to most important by approximately 65% of respondents.

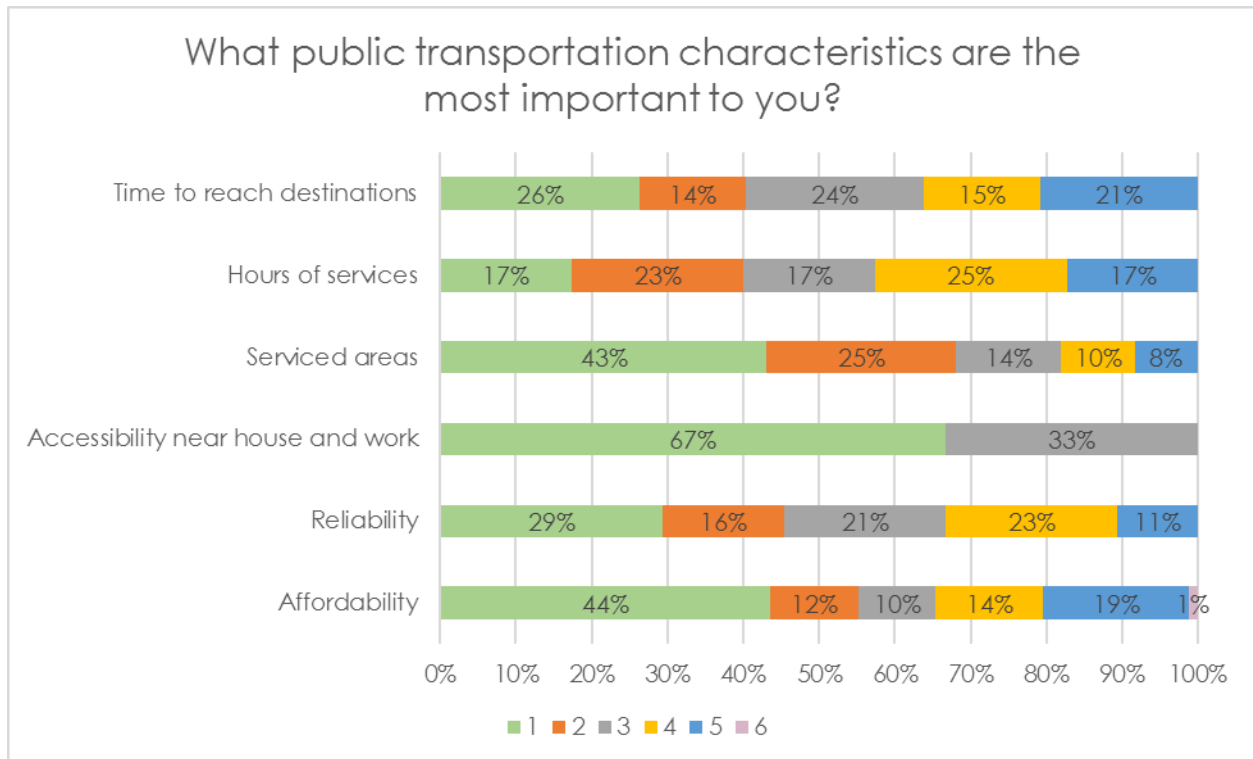


Figure 12: Percent of responses for transportation characteristics, 1=most important, 6=least important

Respondents were asked to rate their satisfaction with current transportation options on a scale from 1 to 5 with 1 indicating very satisfied and 5 indicating not satisfied at all. Twenty-eight percent said they were very satisfied while 33% rated their satisfaction 4 or 5, as displayed in Figure 13.

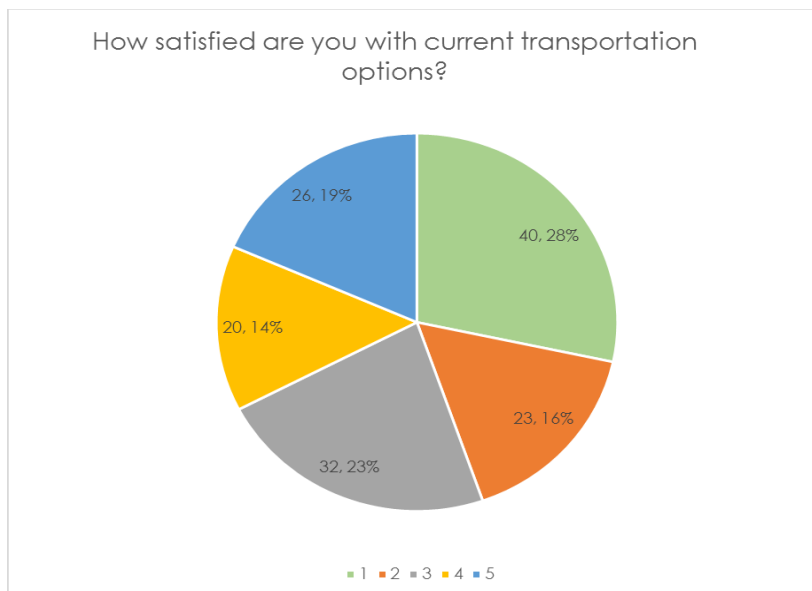


Figure 13: Satisfaction with transportation, 1=very satisfied, 5=not at all satisfied

Respondents ranked six selected characteristics of neighborhoods and “other” in order of importance with 1 indicating most important and 7 indicating least important. Figure 14 shows that healthy neighborhood and access to quality education received the highest number of responses, 132 and 124, respectively, followed by access to employment opportunities (121).

Neighborhood Characteristic	Total responses
Healthy Neighborhood	132
Access to quality education	124
Access to employment opportunities	121
Transportation options and affordability	120
Low-poverty neighborhood	114
Racially and economically-integrated neighborhood	109
Other	17

Figure 14: Number of responses for each neighborhood characteristic

Healthy neighborhoods (Figure 15) received the greatest proportion of rankings of 1 (most important) and 2 (70%) and access to quality education received the next highest proportion of 1 and 2 rankings (62%). Seventeen respondents selected the category for “other”. Five of these respondents specified crime, low crime rate or safe and quiet neighborhoods as important to them. Three respondents specified a priority for no low-income properties, “keep section 8 out” and like-minded neighbors with homogeneous education. Other priorities written in included access to healthcare, proximity to grocery stores and malls, sidewalks in good repair and “natural setting, trees”.

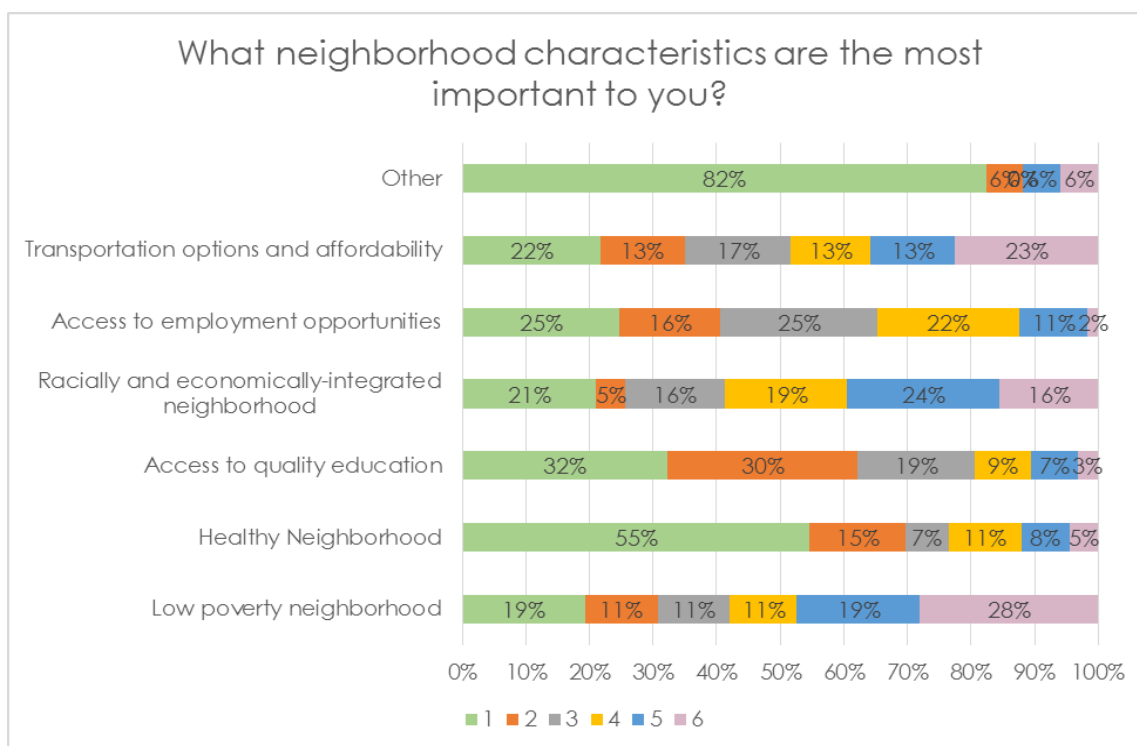


Figure 15: Percent of rankings for each neighborhood characteristic, 1=most important, 6=least important

The following charts describe the demographic characteristics of the respondents willing to complete demographic surveys at public meetings, focus groups and on-line. Respondents to the demographic survey had the following characteristics. The reader is reminded that respondents included community leaders, advocates and stakeholders in addition to families in need of affordable housing.

- Female (68%)
- Hispanic (15%)
- Black (48%)
- Single (38%)
- Have a college degree (54%)
- Employed (47%)
- Annual incomes of less than \$35k per year (39%)
- Own their home (67%)

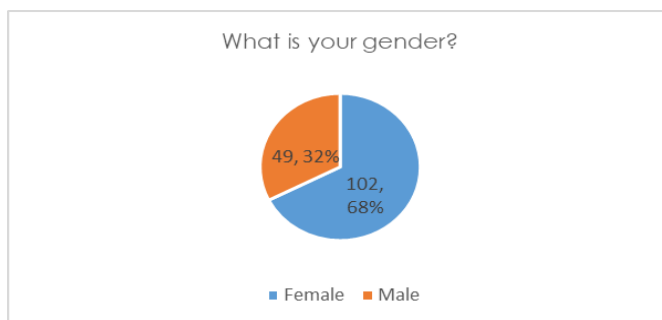


Figure 16: Percent of NTRHA survey respondents by gender

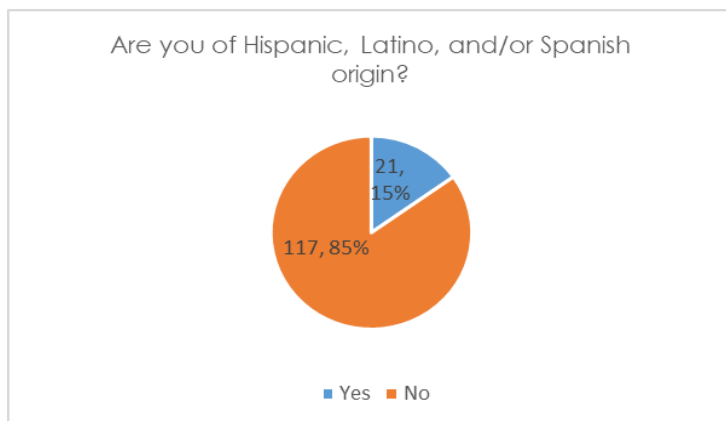


Figure 17: Percent of survey respondents by ethnicity

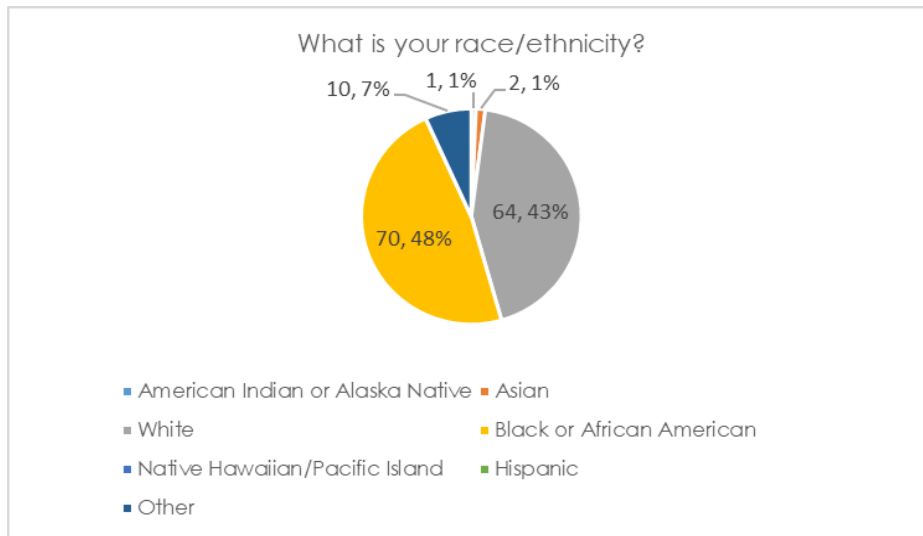


Figure 18: Percent of survey respondents by race and ethnicity

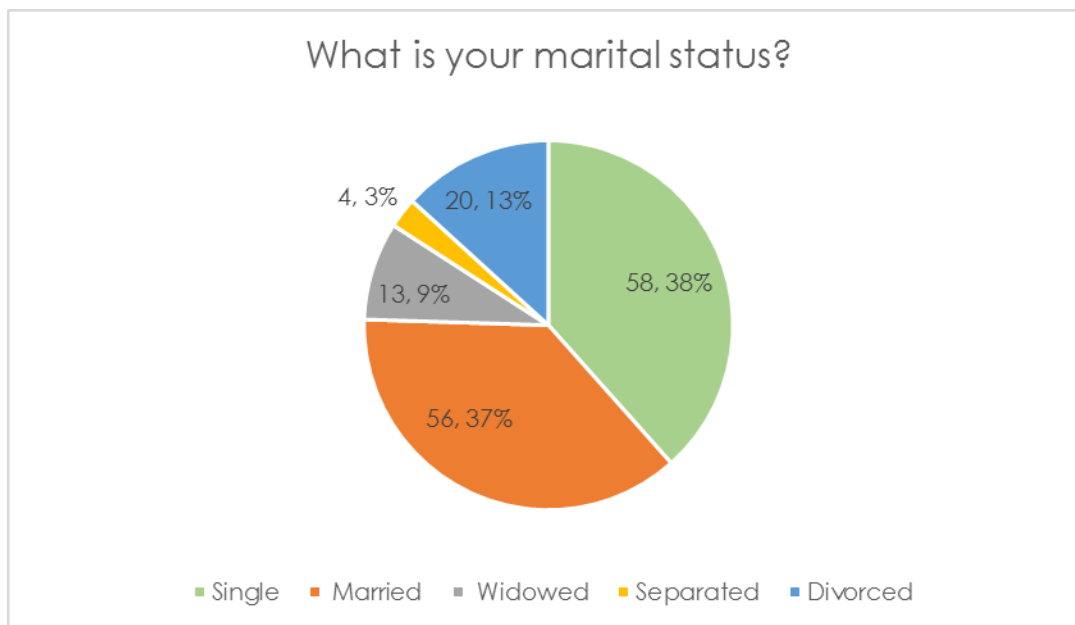


Figure 19: Percent of survey respondents by marital status

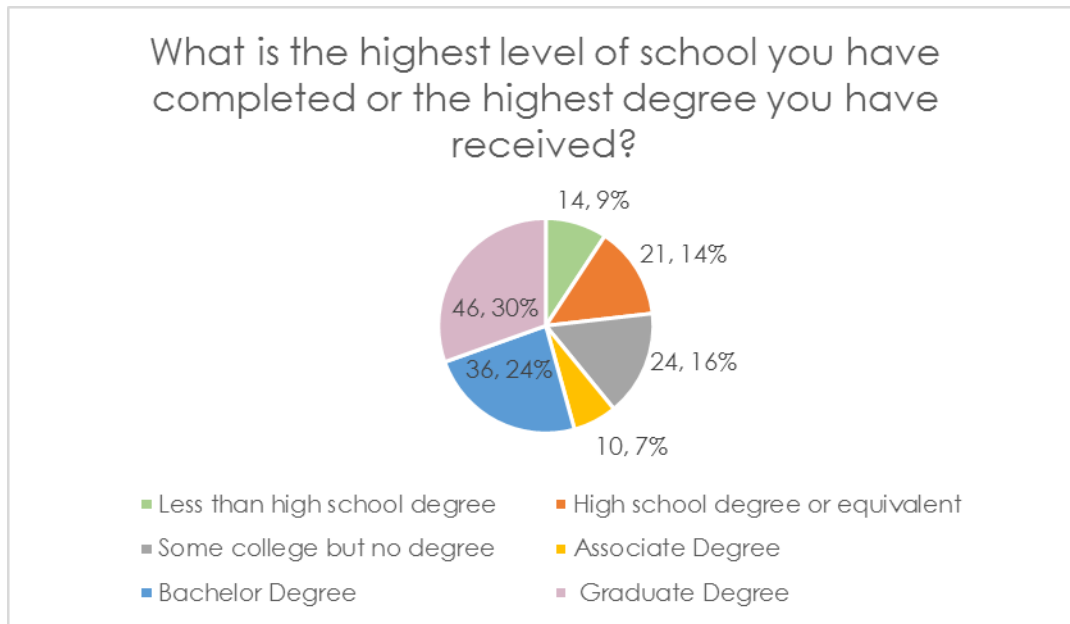


Figure 20: Percent of NTRHA survey respondents by education

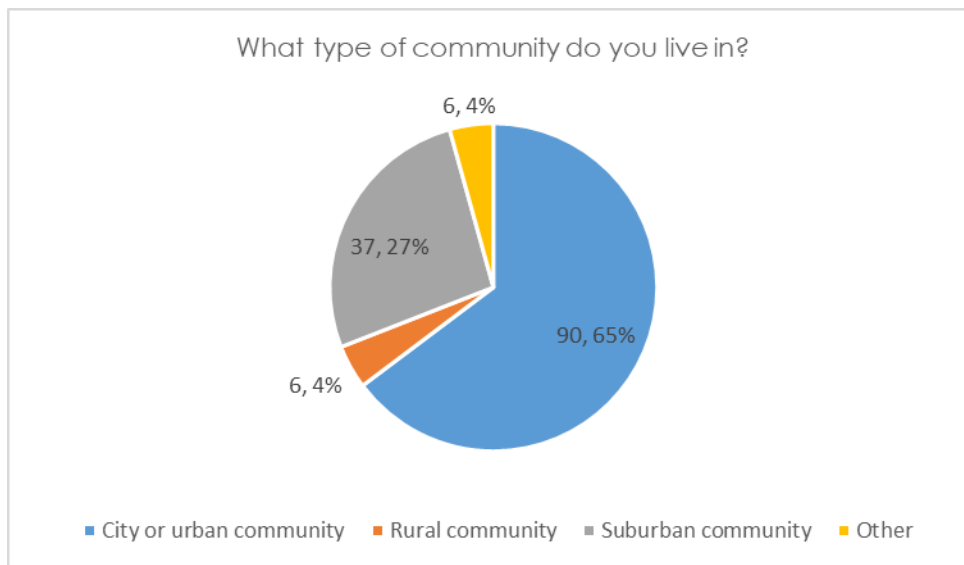


Figure 21: Percent of survey respondents by type of community

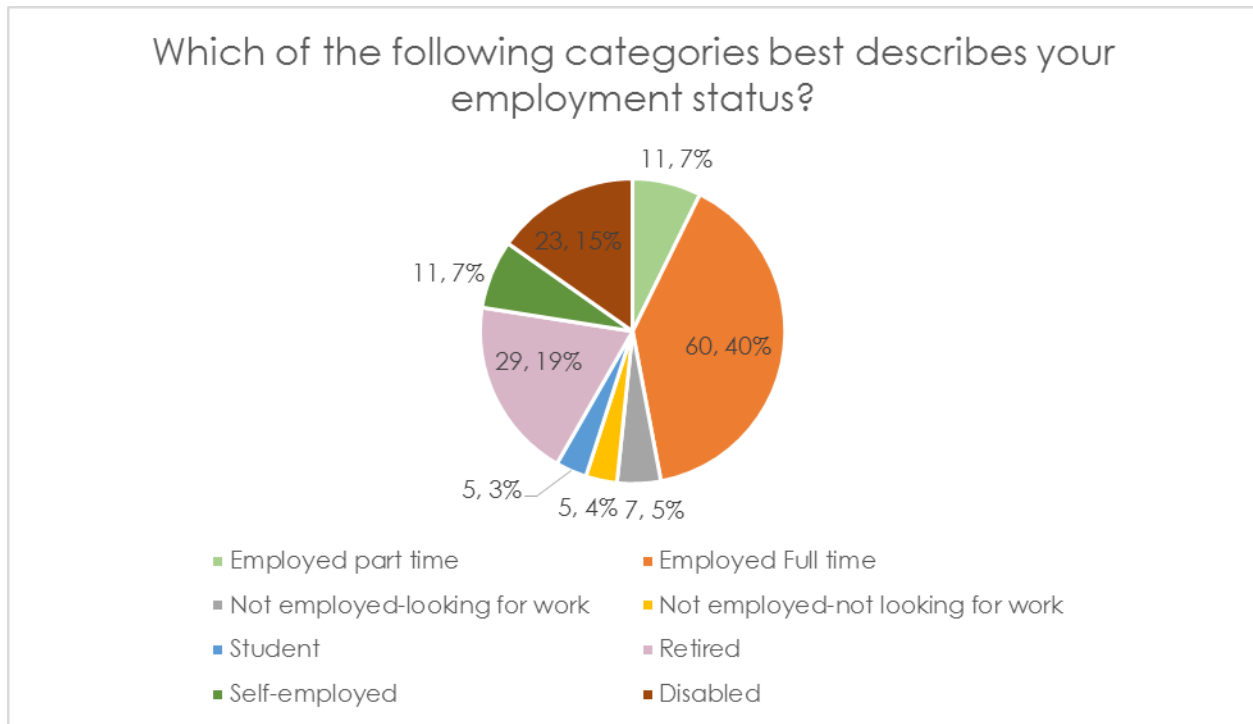


Figure 22: Percent of NTRHA survey respondents by employment status

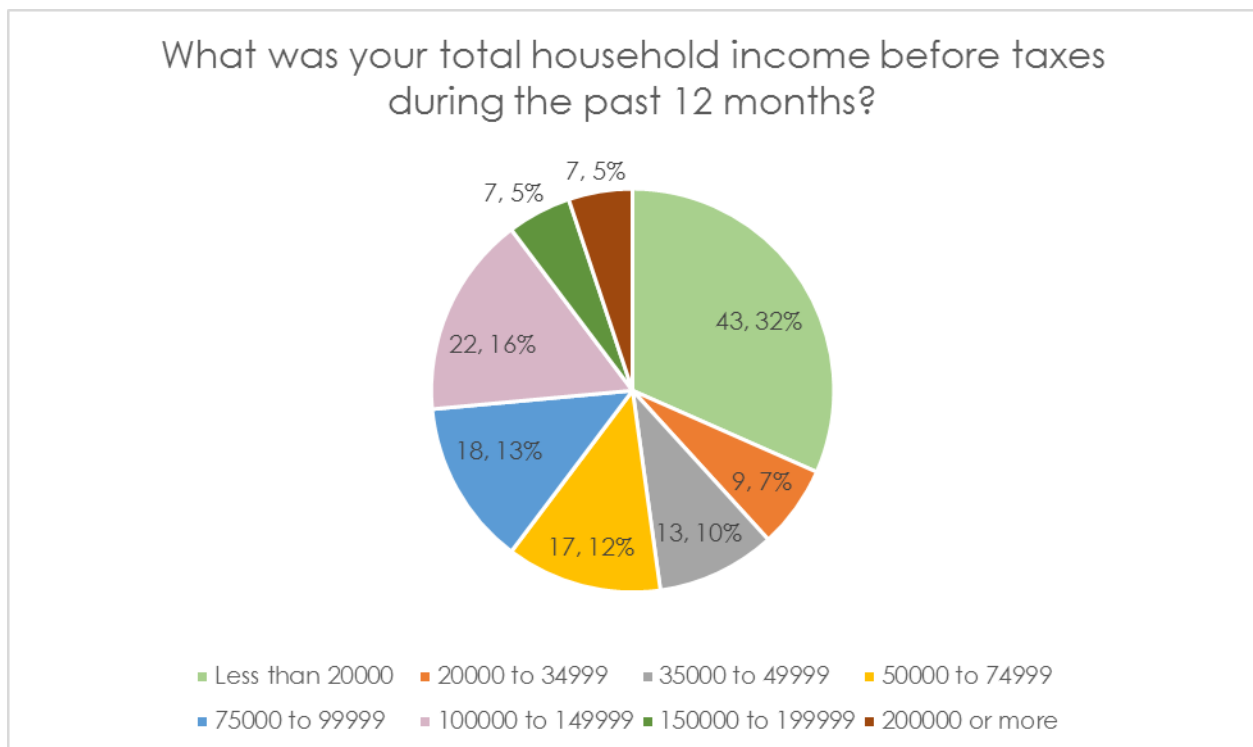


Figure 23: Percent of NTRHA survey respondents by household income

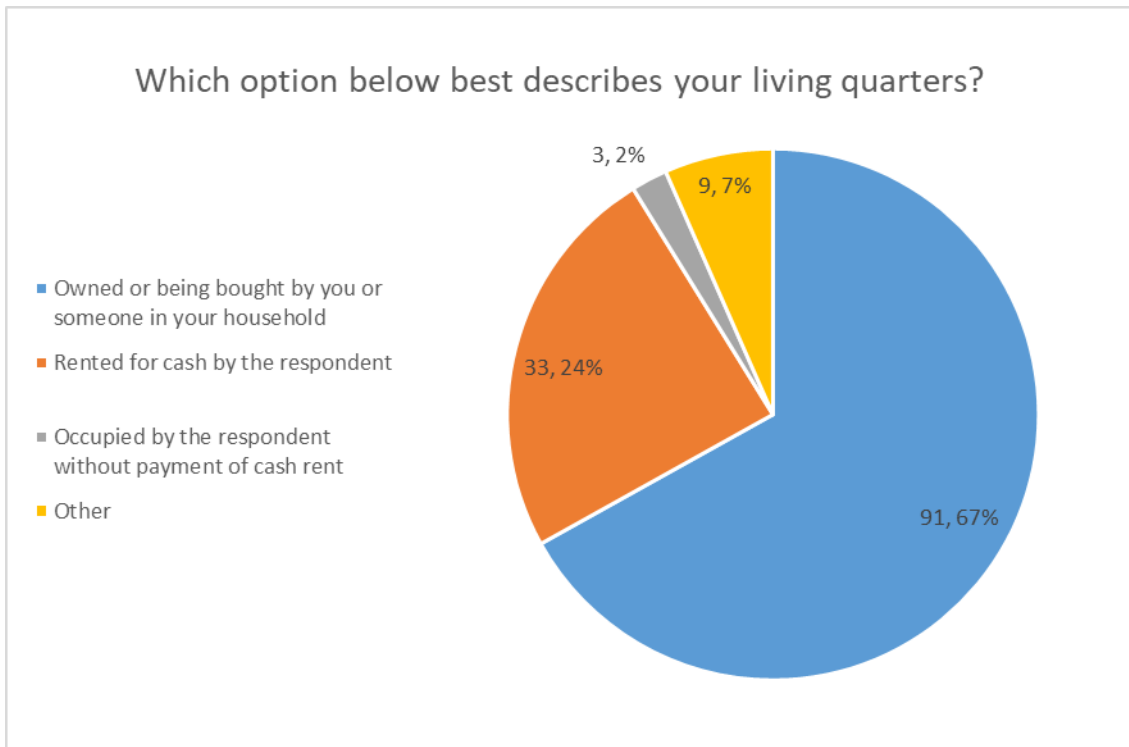


Figure 24: Percent of NTRHA survey respondents by household tenure



SECTION IV

ASSESSMENT OF PAST GOALS AND ACTIONS

IV. Assessment of Past Goals and Actions

1

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

FWHS publishes and updates goals in its five-year and annual plans. The following goals and objectives were published in its Annual PHA Plan for fiscal year 2018 (Fort Worth Housing Solutions, 2017).

Goal one: Create a diverse, economically sustainable real estate portfolio

- A. Create and implement a portfolio plan
- B. Increase developer partnerships
- C. Increase landlord participation in HCV programs

Goal two: Provide a foundation for improving lives

- A. Develop properties in locations that support improving lives through access to schools, transportation, jobs and services
- B. Establish policies and incentives that support movement to self-sufficiency
- C. For children and youth, support other organizations that serve the population
- D. For work-able population, promote financial independence and self-sufficiency
- E. For seniors who are capable of independent living, support their effort to age in place
- F. For special needs population, including people who are chronically homeless, develop service partnerships to secure and maintain housing by leveraging Project-Based Vouchers and other resources

Goal three: Support our employees to enhance an organizational culture of excellence

- A. Clearly define the organizational structure and staffing plan
- B. Develop workforce to support succession planning and career ladders
- C. Build a system of training, mentoring and coaching to empower employees to reach their full potential
- D. Facilitate the Board in developing additional expertise

Goal four: Develop a continuously improving effective and efficient operation

- A. Increase use of performance metrics to evaluate the Authority
- B. Leverage technology to consistently elevate Authority performance
- C. Rebrand FWHA with a comprehensive marketing, branding and outreach plan

Goal five: Develop a sustainable business model

- A. Explore cost-saving and business efficiencies, including shared services with other housing authorities
- B. Generate and increase development-related revenue
- C. Pursue opportunities to provide fee for service or consortium services
- D. Pursue and increase government partnerships and philanthropic sources of revenue

a

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

FWHS publishes goal progress in its annual plans. The following results were included in its report for fiscal year 2018 (Fort Worth Housing Solutions, 2017).

Goal one: Create a diverse, economically sustainable real estate portfolio

A. FWHS has developed a process for reviewing its current portfolio on a quarterly basis to identify opportunities for refinancing, selling or repositioning our assets.

B. FWHS has worked diligently to outreach to various developers in and around Texas. FWHS has utilized the Request for Qualification (RFQ) process to pre-qualify developer partners with experience and capacity in developing mixed-income affordable housing. FWHS selected four developers in 2015 to serve on an as-needed basis through May 2018 to assist in the expansion of affordable housing opportunities with an additional eight developers selected in 2017 for use as needed through May 2020. FWHS actively engages with seven developer partners on six different development and construction projects with two additional projects pending approval. Figure 25 displays the locations of FWHS properties owned (26), approved and in development or construction (six) and pending approval (two) (Mitchell, Vice President, Assisted Housing Programs, FWHS, 2018).

C. FWHS has developed various marketing campaigns targeted toward encouraging new landlords to participate in the HCV program. FWHS has seen an increase in the number of new landlords participating.

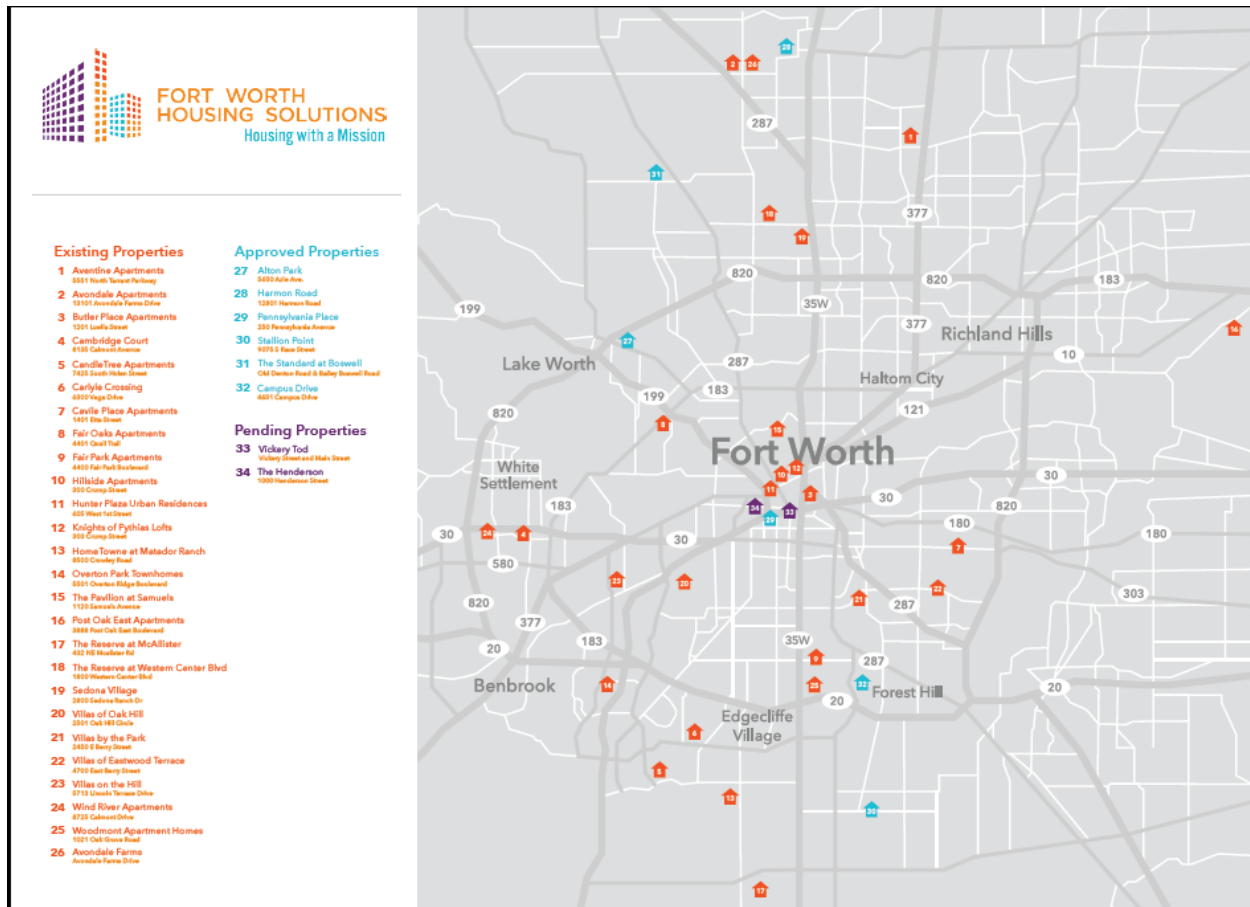


Figure 25: FWHS properties existing, in development and pending approval as of February 2018

Goal two: Provide a foundation for improving lives

A. FWHS has identified several development locations throughout Fort Worth that all provide better access to higher performing schools, transportation opportunities, areas with high job growth and supportive services. FWHS also works closely with the Fort Worth Independent School District, the City of Fort Worth and the Fort Worth Transportation Authority to identify areas where future schools, transportation routes and economic development are being proposed to ensure that future developments are located in areas of opportunities. None of the locations of the eight projects under development or awaiting approval shown in Figure 25 are located in racially and ethnically concentrated areas of poverty (R/ECAP). FWHS received HUD approval for a total conversion of its public housing portfolio, through the Rental Assistance Demonstration (RAD) program, to project-based rental assistance (PBRA), including 1,002 units. Properties listed in Figure 26 are in the process of conversion. Only seven units at Butler Plaza remain to be converted under the RAD process (Lemons, 2018). Unit mixes are being changed through the conversion process in order to better meet the needs of current residents and applicants by significantly increasing the number of one-bedroom and four-bedroom units.

Project Name	Total Units	OBR	1BR	2BR	3BR	4BR	HC (W)	HC (V)
Butler Place Apartments 1201 Luella St. Fort Worth TX 76102	412	0	92	159	139	22	27	2
Cavile Place Apartments 1401 Etta St. Fort Worth, TX 76105	300	0	60	146	69	25	15	0
Butler Place Apartments (Scattered Sites)	20	0	0	14	2	0	2	0
Overton Park 5501 Overton Ridge Blvd. Fort Worth, TX 76132	54	0	23	21	10	0	4	4
Sycamore Center Villas 7901 Chandra Lane Fort Worth, TX 76134	47	0	0	20	23	4	2	0
Stonegate (Villas of Oak Hill) 2501 Oak Hill Circle Fort Worth, TX 76109	58	0	24	26	0	0	2	0
Cambridge Courts 8135 Calmont Ave. Fort Worth, TX 76116	33	0	18	15	0	0	9	0
Candletree Apartments 7425 South Hulen Fort Worth, TX 76133	44	0	23	21	0	0	3	0
Wind River 8725 Calmont Ave. Fort Worth, TX 76116	34	0	10	24	0	0	6	0

Figure 26: FWHS public housing units converted to PBRA under RAD

B. FWHS continues to encourage participation in the Family Self Sufficiency program (FSS) and Homeownership programs by both HCV and PH residents. In addition, FWHS, through the Barbara Holston Education Fund, provides scholarships to select graduating seniors or adults attending vocational, two-year or four-year institutions. Participation in both the FSS and Homeownership programs has increased since 2015. Figure 27 displays the number of participants in each program and the number of households successfully closing on a home purchase in 2015, 2016 and 2017. FSS participation increased by 11% and homeownership participation increased by 35% from 2015 to 2017.

Year	# of FSS Participants	# of FSS Graduates	# of Homeownership Participants	# of Property Closings
2015	285	17	288	9
2016	302	18	306	22
2017	316	19	390	7

Figure 27: Results of FWHS FSS and Homeownership programs

C. Our partnerships supporting our youth population include:

- YMCA Amaka Child Care Center – a four-star, Texas Rising Star accredited facility located on FWHS's largest PH site
- Boys & Girls Club of Greater Fort Worth – has three local branches located in FWHS properties, including two Cavile and Butler PH communities and a new branch in the Las Vegas Trail community
- Silhouettes – a girls mentoring program developed in partnership with Alpha Kappa Alpha sorority

D. FWHS also partners with Tarrant County College to provide ongoing vocational and occupational training, including GED, Adult Literacy, Computer and Medical Training.

E. FWHS offers assistance to elderly and disabled program participants that makes it easier for them to 'age in place' and live an independent lifestyle. Assistance includes help with:

- Budgeting and housekeeping
- Free meal services
- Rent and utilities
- Healthcare
- Transportation
- Social Security, SSI, Medicare or Medicaid and Lone Star

F. FWHS continues to provide programs and housing for special needs populations. FWHS administers a locally funded housing program for chronically homeless individuals. In addition, FWHS has partnered with MHMR in the Healthy Community Collaborative, a program designed to assist chronically homeless individuals or families with severe mental health illness by providing short-term and long-term rental assistance, as well as supportive services for persons who are homeless.

Goal three: Support our employees to enhance an organizational culture of excellence

A. FWHS continually analyzes its organizational structure and staffing needs, as well as staff capacity to determine where efficiencies can be seen through realigning staff and skills throughout the organization.

B. FWHS has developed a succession plan and implemented steps to ensure that employees have opportunities to develop skills and advance within the organization.

C. Ongoing training is being provided for staff, including specific training for managerial staff, to develop staff skills and capacities. A Continuous Improvement Team has been created to identify areas within the organization that need improvement and empower staff from various departments to develop solutions for these areas.

D. FWHS provided board members with opportunities for training and networking through online training opportunities, various conferences and topic-specific work sessions. In addition, Board members are encouraged to share their expertise with other PHAs.

Goal four: Develop a continuously improving effective and efficient operation

A. FWHS is developing an internal measurement system to evaluate the organization's performance on both internal measures and external measures. Checklists have been developed to improve the efficiency and completeness of client annual recertification.

B. FWHS is developing a Strategic IT Plan to assess and prioritize hardware and infrastructure upgrade needs and opportunities for enhancement.

C. FWHS has completed a rebranding from Fort Worth Housing Authority to Fort Worth Housing Solutions. The rebranding plan includes revising external marketing pieces to complement FWHS priorities and outreach efforts.

Goal five: Develop a sustainable business model

A. FWHS has begun working with other PHAs to determine areas where shared services or collaboration can be financially and administratively beneficial.

B. FWHS has identified and implemented development-related revenue through the issuance of bonds, as well as the aggressive negotiation of developer fees through co-development arrangements. FWHS has begun to research self-developing affordable housing projects as well as developing in partnership with other PHAs.

C. In conjunction with objective A, FWHS has begun providing fee-paid services to other PHAs through inter-local agreements.

D. FWHS continues to work closely with the City of Fort Worth to maximize local funding sources and has begun to identify areas of opportunity within the philanthropic community where FWHS can leverage organization resources to maximize alternate funding sources, such as foundation funding.

b

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

FWHS has made progress toward its goals in all areas. Many of these goals require the establishment of new systems (measurement, training, development) so much of the recent work has been to put such systems in place. FWHS made substantial progress in professionalizing its housing development capacity and continues its work as one of the major producers of new affordable housing in its jurisdiction.

HCV program cost

FWHS identified a shortfall in November 2017 when the expense for its voucher programs exceeded revenue and authorized budget. The FWHS budget for Housing Choice Vouchers (HCV) was insufficient to support the number of vouchers in use by the agency (Mitchell, 2018). FWHS turns over approximately 40 vouchers per month. The agency issued no new vouchers until it eliminated the shortfall through attrition in 2018 (except for special-use programs). The shortfall was resolved in approximately six weeks. FWHS will closely monitor program costs as it implements the new Small Area Fair Market Rent program and rents are increased in certain zip codes.

Landlord engagement

FWHS conducted a survey of its 1,103 landlords in June of 2015 to identify opportunities to better engage and maintain landlords (FWHS, 2015b). Over 100 landlords responded, primarily owners with one to five HCV units with one to 10 years of experience in the program. Respondents identified issues around processes for inspection, rent increases and resident relocation. Approximately half of the responses were favorable in most areas. Over 90% said that payments were timely and more than 70% said they would consider accepting additional FWHS residents.

Respondents said that guaranteed, timely, direct deposit of rental payments (80%) were the program's greatest strengths. Those who would not accept additional residents cited reasons, including quality of tenants (37.5%), rent amount (27.5%), FWHS customer service (25%), inspection requirements (25%) and insufficient rent increases (22.5%). Respondents cited reasons for considering terminating participation, including damages to apartments by tenants and a perceived bias towards tenants. FWHS implemented the following policy changes in response to this feedback:

- Eliminated the \$50 cap on rent increases
- Increased consistency of inspection standards, including coordinating with Tarrant County Housing Assistance
- Developed process to support evictions by landlords for recurring tenant lease violations with HCV program terminations and consistent messages to tenants
- Implemented required Good Tenant/Good Neighbor training for all program participants

FWHS also increased marketing efforts and conducted partner events with the City of Fort Worth to attract new landlords. FWHS continues to work to address ongoing challenges to increase landlord engagement and maintain landlord relationships. During AFH public participation events and interviews, landlords continued to express concerns with tenant damage to units, frustrations with process efficiency and standards for inspections, confusions about the rent increase process and inadequate customer service in response to phone calls and requests for assistance. FWHS will continue to develop strategies to address these issues.

Community impact

FWHS is making substantial progress in developing housing in higher opportunity areas with good schools even in the face of continuing expression of community opposition. Some community members have expressed concern over the impact of residents of some FWHS properties on the neighborhood. FWHS has begun a series of "community coffees" to better understand and manage such concerns and to become increasingly proactive.

Family Self-Sufficiency

FWHS supports one of the largest FSS programs in the U.S. in terms of number of participants (Ficke & Piesse, 2004), ranking in the top 14% of public housing authorities with HCV programs. Approximately 5% of its HCV and public housing clients participate in FSS, placing it among the top half of all FSS programs for participation rate. Participants receive close case management and assistance with establishing, maintaining and achieving personal, educational and financial goals. Graduates achieve their goals, become fully employed and independent of cash welfare assistance (Broussard, 2018). The FWHS Home Ownership program helps participants use funds from Section 8 vouchers to purchase homes. The program garners a significant amount of interest among clients, leading to significant increases in the pipeline of participants. Closings, however, dropped significantly from 2016 to 2017, largely due to the "buyer's market" in single-family homes in the region. Participants had greater difficulty in competing with other (unassisted) buyers and investors who were offering contracts at prices higher than asking prices and in cash.

C

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

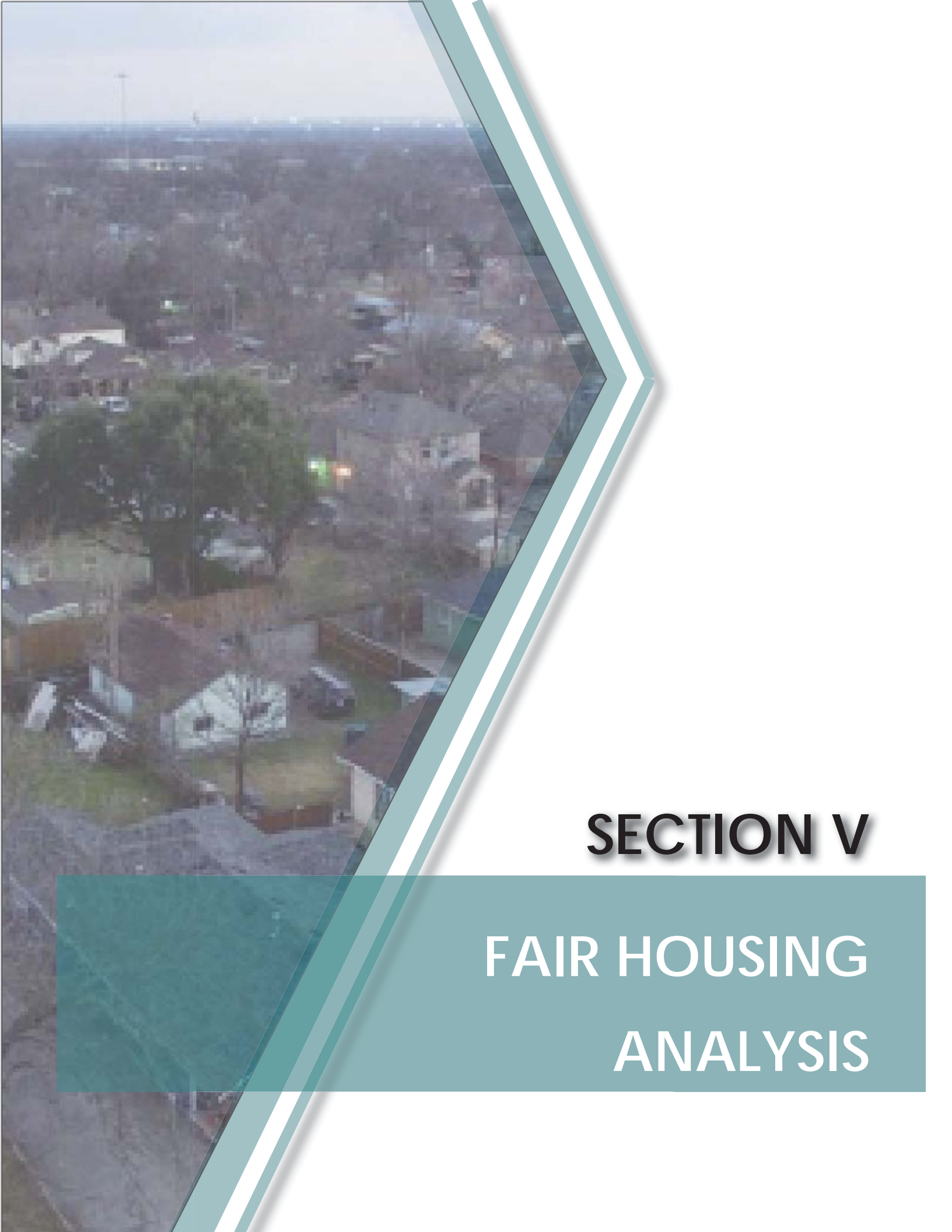
FWHS is developing a substantial set of quantifiable targets against which to compare its performance. Annual performance reports will be able to include more quantitative measures of progress and allow for greater analysis of efforts toward improvement. Obstacles to greater improvement in its voucher programs hinge on market conditions and funding availability.

d

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

The AFH goals proposed in this report are a natural outgrowth of past FWHS goals. Goals continue to emphasize increased access to opportunity and housing in high-opportunity areas as well as increased development of affordable housing. New goals also directly target some of the challenges faced by FWHS clients in the current housing market, including significant source of income discrimination. New goals include developing funding sources that offer clients greater support in seeking housing and offer landlords more incentives to participate in the voucher program.

Market conditions and the increasing deficit of affordable housing in the area have emphasized the need to be strategic and targeted in efforts to meet needs for low-income housing. FWHS is collaborating with the City of Fort Worth, Tarrant County Homeless Coalition, Arlington Housing Authority, Housing Channel (a local Community Housing Development Organization or CHDO), Habitat for Humanity and the Tarrant County Housing Assistance Office (a public housing authority) to develop a strategic plan for affordable housing that improves coordination and overall effectiveness.



SECTION V

FAIR HOUSING ANALYSIS

V. Fair Housing Analysis

A. Demographic Summary

1

Describe demographic patterns in the jurisdiction and region and describe trends over time (since 1990).

Overall trends 1990-2013

From 1990 to 2013, the racial and ethnic composition of the City of Fort Worth changes significantly for some ethnic groups (Figure 28). During this period, the white population percentage declines gradually from 58% in 1990 to 42% in 2010 and 2013. This change appears slightly lower than regional trends (Figure 29), where the proportion of white residents declines from 70% in 1990 to 50% in 2013.

While the share of white residents declines both at the jurisdictional and regional level, the Hispanic population expands at both levels. In Fort Worth, from 1990 to 2013, the Hispanic population adjusts from 19% of the overall population in 1990 to 34% in 2010 and 2013 and the regional Hispanic population increases from 13% in 1990 to 27% in 2013. As for the black population, Fort Worth and regional levels experience slightly dissimilar trends. In Fort Worth, the share of black residents decreases from 21% to 18% between 1990 and 2013. Regionally, the share of black residents remains relatively unchanged with a slight increase from 13.7% (1990) to 14.6% (2013). Native Americans do not account for a significant share of the population in Fort Worth or the region. In Fort Worth, the proportion remains between 0.3% to 0.4% in 1990 and 2013, with a slight increase in the intermediate years. In the region, the share of Native American residents experiences no significant change. The Asian or Pacific Islander (Asian/PI) population share in Fort Worth increases from 2% in 1990 to 3.7% in 2013. Regionally, the Asian/PI population increases from 2% to 5%.

Fort Worth's demographic changes from 1990 to 2013 generally reflect the regional changes with decreasing white population proportions and increasing Hispanic and Asian/PI proportions. Fort Worth has greater black and Hispanic proportions than the region; the decrease in the black proportion represents the only significant difference between the jurisdiction and the region.

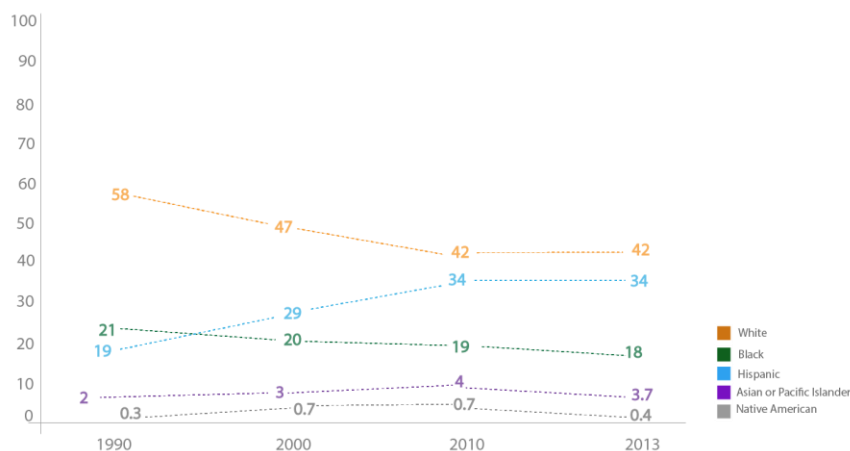


Figure 28: Percent of population by race and ethnicity over time, FWHS, U.S. Decennial Census and ACS

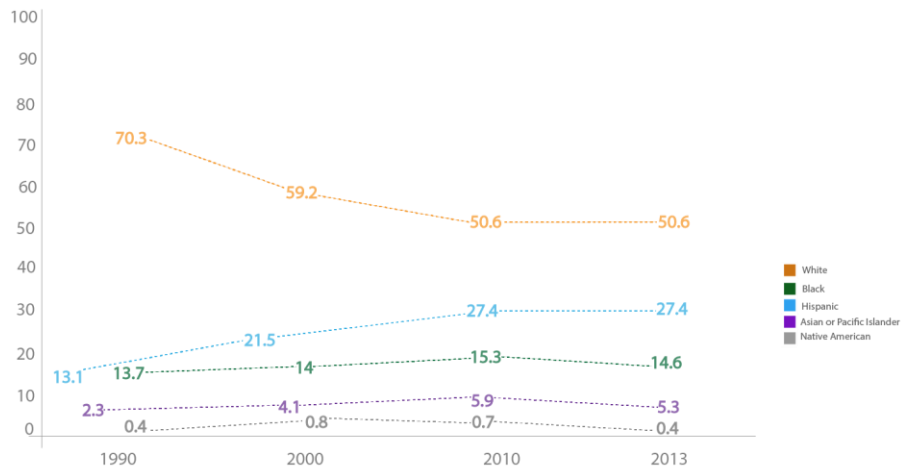


Figure 29: Percent of population by race and ethnicity, NTRHA Region, U.S. Decennial Census and ACS

Figure 30 spatially represents the demographic trends in Fort Worth using maps that represent the racial or ethnic concentration at the census tract level for the years 1990, 2000, 2010 and 2015 (U.S. Decennial Census and the American Community Survey). As the racial or ethnic concentration increases, the shade on the map darkens.

In 1990, white residents prevailed throughout Tarrant County except for one wedge northwest of downtown (roughly bordered by I-35W, SH 199 and I-820), another area southeast of downtown (bordered by SH 180, I-35W, I-820 and I-20, including Everman) and the Como area in southwest Fort Worth. By 2015, the concentration of the white population decreased throughout Tarrant County. In 1990, the black population concentrated in the Como and southeast areas. From 1990 to 2015, the black population remained prevalent in most of the census tracts in the southeast area and Como, but the overall percentage of black residents in the southeast area decreased as Hispanics entered. During this period, the black population dispersed into Grand Prairie and far east and south Fort Worth. The overall growth of the Hispanic population translates into the expansion of geographic clusters of Hispanic residents. In 1990, the highest concentration of Hispanic residents live in the northwest wedge defined by SH 199, I-35W and I-820. The Hispanic population retained predominance in this area from 1990 to 2015, but the overall percentage of Hispanic residents in these census tracts decreased by 2015. During this time, the Hispanic population expanded to the south, southeast and east along SH 121 but inside I-820. Asian/PI and Native American households do not exhibit any consistent patterns in these figures.

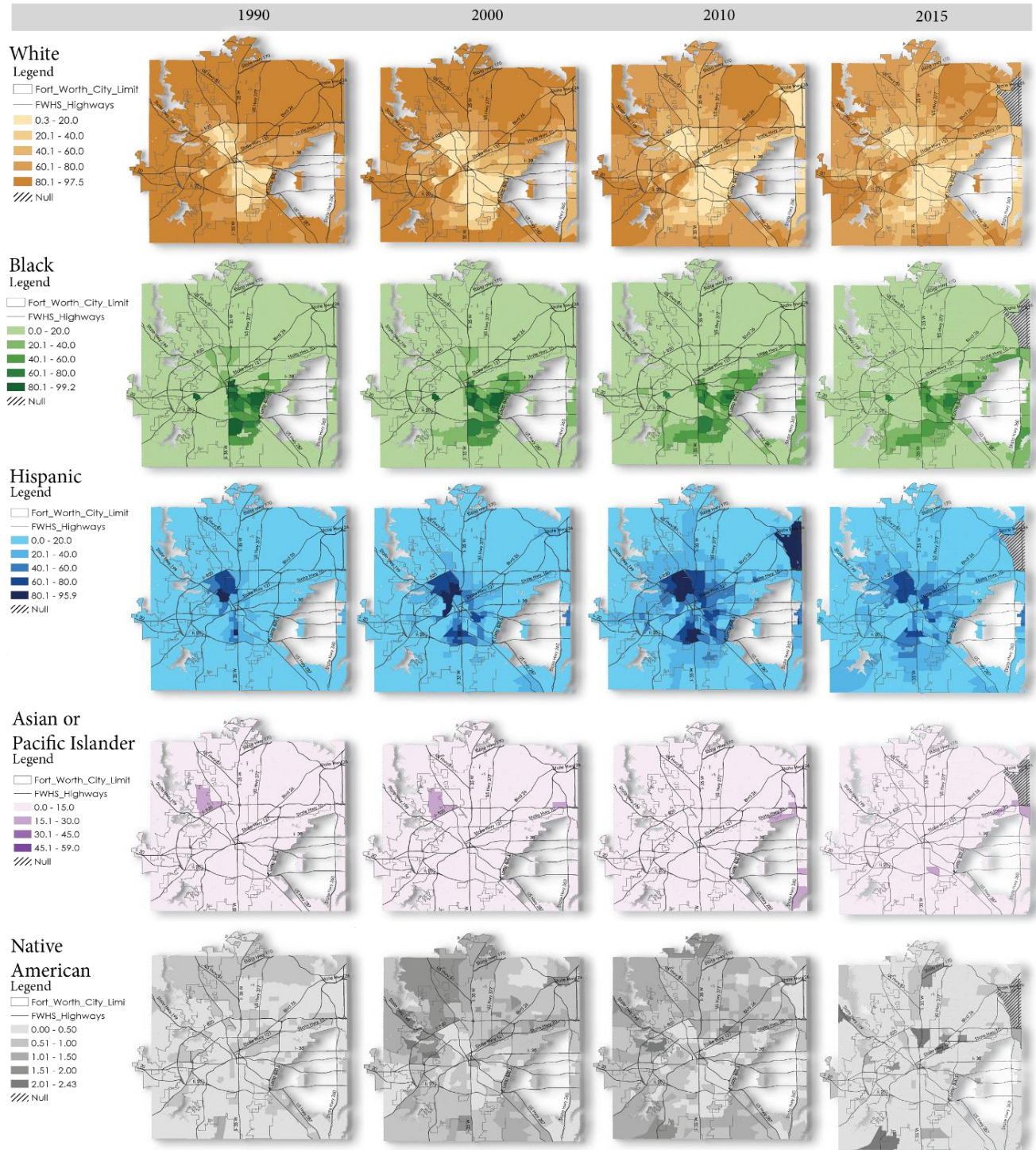


Figure 30: Percent of population by census tract for race and ethnicity, Fort Worth

B. General Issues

i. Segregation / Integration

Analysis

a.

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

To gauge overall levels of segregation in the City of Fort Worth and the region, HUD provides a dissimilarity index, which is a conventional measure to assess the degree of residential segregation between two groups. As the dissimilarity index value increases, the level of segregation also increases. The index value ranges from 0 to 100 where values from 0 to 39 indicate a low level of segregation, values from 40 to 54 indicate a moderate level of segregation; and values from 55 to 100 indicate a high level of segregation.

In Figure 31, the dissimilarity index values indicate moderate segregation for white/non-white populations, but black residents are highly segregated. The Hispanic population experiences moderate segregation while Asian/PI residents experience low segregation in the jurisdiction. As a whole, the level of segregation for Fort Worth remains similar to the DFW region according to the dissimilarity index, except for Asian/PI residents who are more highly segregated at the regional level.

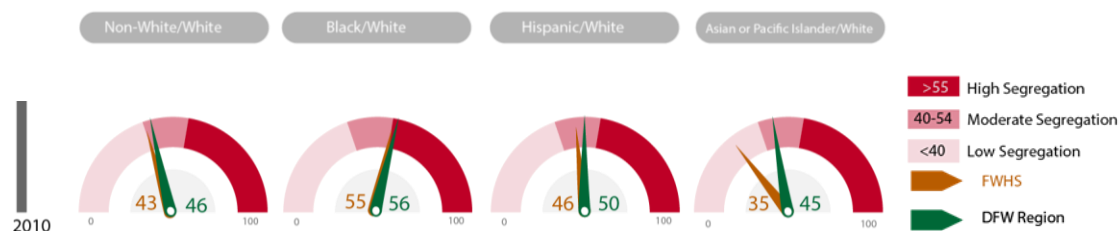


Figure 31: Dissimilarity index scores by race/ethnicity, HUD AFH, U.S. Census 2010

The following figures investigate the demographic composition of census tracts with different levels of white/non-white segregation in the FWHS jurisdiction in 2015 as indicated by the degree of difference between census tracts and the jurisdiction as a whole. Figure 32 defines the levels of segregation identified. For white/non-white segregation, level 1 represents census tracts where the percent of white residents in the census tract is greater than the percent of white residents in the jurisdiction as a whole. Level 2 represents census tracts where the proportion of non-white residents equals the proportion in the jurisdiction as a whole (sometimes called "integration"). Levels 3 through 7 characterize census tracts where the percent of non-white residents is greater than the percent of non-white residents in the jurisdiction as a whole. Level 7 reflects the most severe case of segregation.

Level	Definition: Census tract compared to jurisdiction
1	White population share in census tract greater than jurisdiction share
2	Census tract share equal to jurisdiction share
3	Census tract share up to 10% greater than jurisdiction share
4	Census tract share >10% to 20% greater than jurisdiction share
5	Census tract share >20% to 30% greater than jurisdiction share
6	Census tract share >30% to 40% greater than jurisdiction share
7	Census tract share more than 40% greater than jurisdiction share

Figure 32: Levels of segregation based on difference between census tract and jurisdiction

Figure 33 displays overall proportions of selected groups in the jurisdiction of FWHS and the DFW region in 2015. Figure 34 shows the demographic composition of census tracts with increasing levels of white/non-white segregation in 2015 in the FWHS jurisdiction. Census tracts with the highest levels of segregation have a greater proportion of residents with extremely low incomes (less than 30% of area median income), limited English proficiency, residents who are foreign born and families with children.

2015	White non-Hispanic	Black	Hispanic	Asian/PI	Foreign born	LEP
FWHS	52%	13%	28%	4%	15%	6%
DFW	49%	15%	28%	6%	18%	7%

Figure 33: Demographics of protected groups in FWHS and the DFW region, ACS 2015 five-year estimate

Segregation Level	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign born	% Families w/child(ren)
1	72	7	11	4	7	6	12	4	9	47
2	52	11	19	5	7	9	15	10	16	53
3	46	14	22	7	8	9	13	11	17	52
4	36	21	26	5	12	14	17	16	20	53
5	27	33	24	6	13	11	15	14	20	55
6	17	26	36	6	15	12	15	23	28	59
7	6	30	46	1	19	15	15	28	29	56

Figure 34: Demographic composition of census tracts by severity of white/non-white segregation, FWHS jurisdiction, ACS 2015

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

To supplement the HUD-provided dissimilarity index and assess spatial patterns of segregation, additional maps were created to understand how the racial composition of a given census tract differs from the racial composition of the surrounding city or region. NTRHA researchers created the following maps to understand to what extent the protected group composition (race, ethnicity, national origin, limited English proficiency) of a given census tract significantly differs from the protected group composition of the surrounding jurisdiction or region by assessing whether a statistically significant difference exists. The following maps compare the percentage of each protected group in each census tract to the jurisdiction average to determine the size of the difference using the levels of segregation defined in the previous section. (For the full methodology, refer to Appendix.)

As discussed in the previous section, FWHS jurisdiction has moderate levels of segregation between non-white and white residents using the dissimilarity index; however, Figure 35 clearly illustrates the significantly greater concentration of non-white residents in northwest and southeast Fort Worth where the percent of non-white residents exceeds the jurisdiction average by more than 40% in many census tracts. South Fort Worth, portions of east and west Fort Worth, Grand Prairie and Everman all show high non-white concentrations. The white population concentrates in suburban locations of Tarrant County to the north, west and south and in southwest Fort Worth.

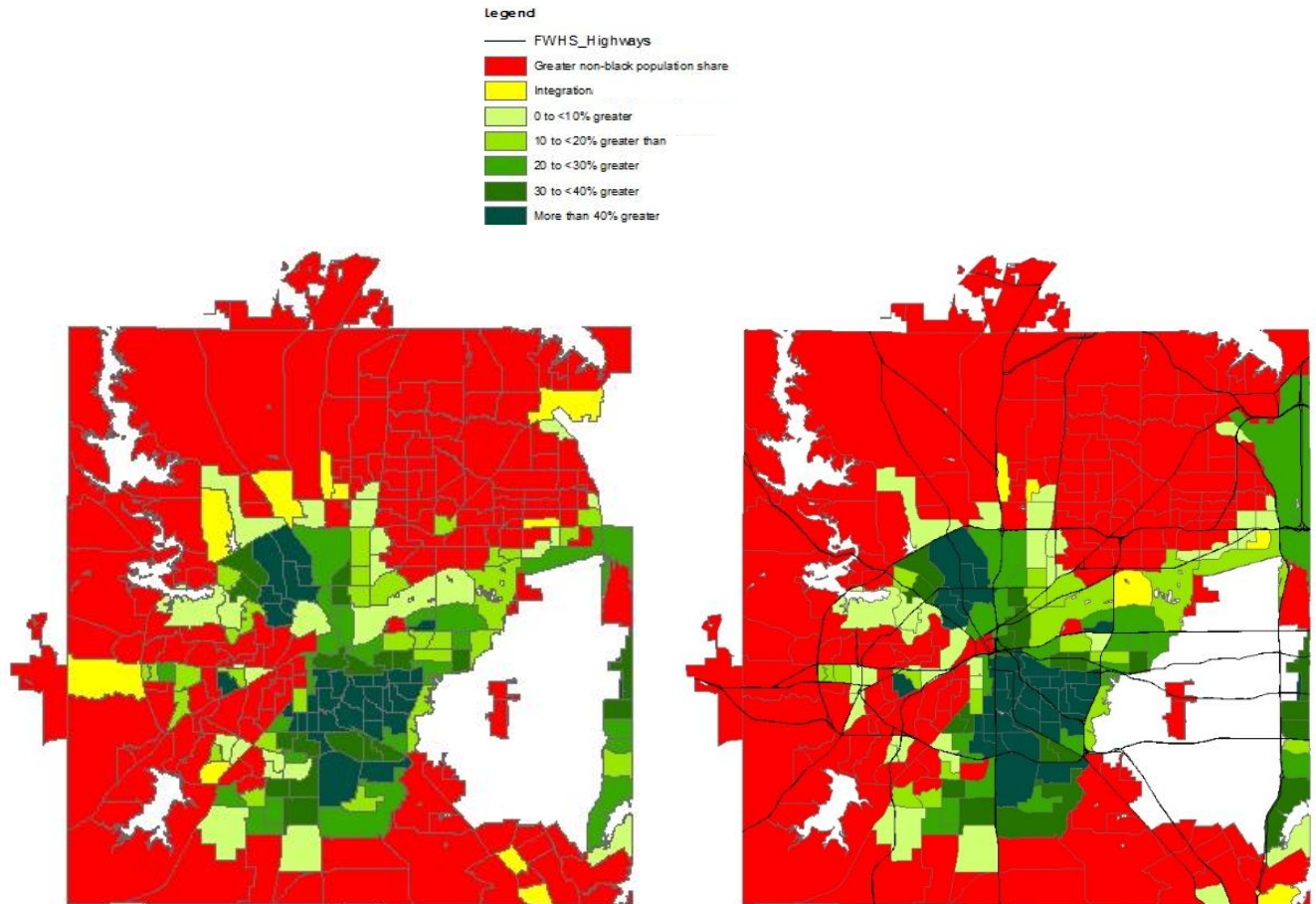


Figure 35: FWHS jurisdiction white to non-white segregation, 2010 and 2015 (ACS)

Patterns of segregation can also be analyzed from a regional perspective. Figure 36 and Figure 37 display the jurisdictions of the 20 cities and housing authorities that make up the NTRHA. This area includes the 13 counties that make up the DFW MSA. The dark green sections in the following maps represent census tracts where the percent of non-white residents is more than 40% greater than the percent of non-white residents in the NTRHA region as a whole. Segregation between white and non-white residents, when analyzed at a regional level, appears most severe in sections of Dallas and Fort Worth. Segregation also appears to be occurring on a limited basis in many of the county seats throughout the region.

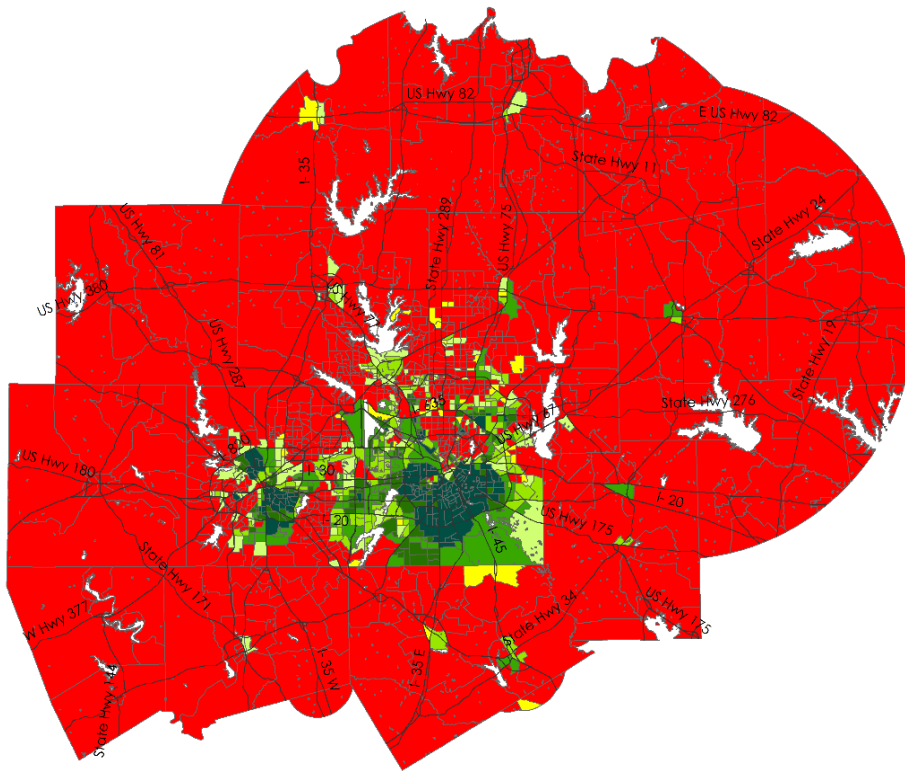


Figure 36: Regional patterns of segregation NTRHA, U.S. Decennial Census 2010

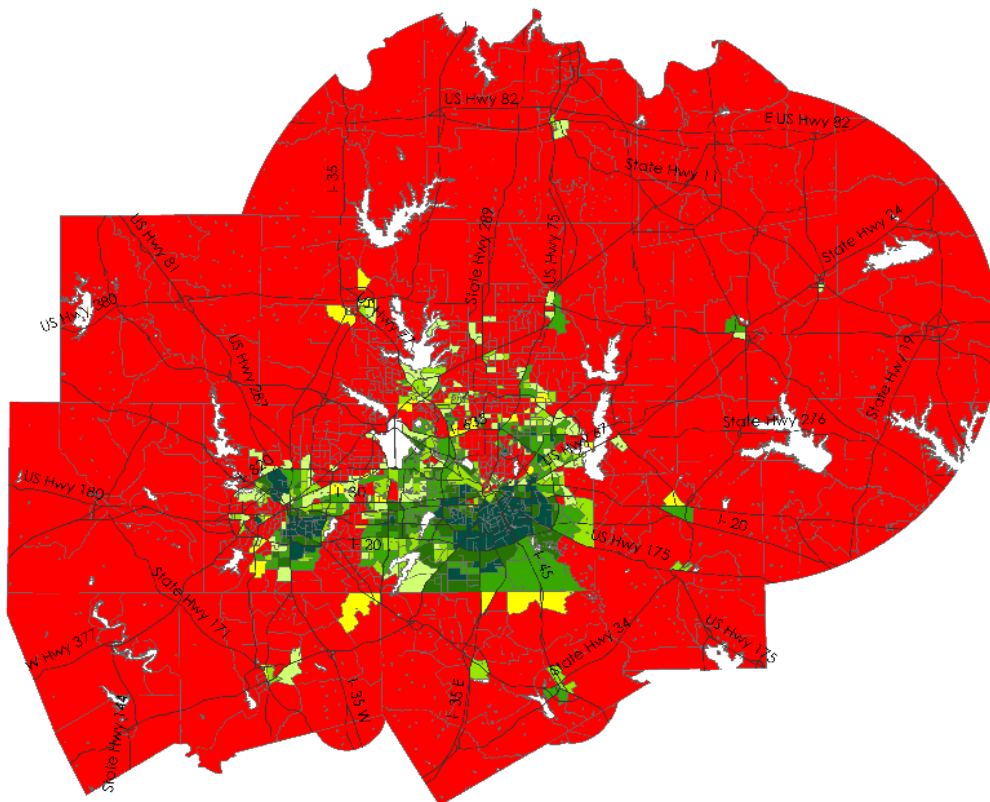


Figure 37: Regional patterns of segregation NTRHA, ACS 2015

Segregation: black vs. non-black (2010)

Figure 38 displays the level of segregation experienced by black residents in the FWHS jurisdiction. Black residents are concentrated throughout southeast Fort Worth. High concentrations also occur in Como (southwest Fort Worth) and east areas of Fort Worth near I-30 and Everman. Less severe concentrations occur in Grand Prairie and south Fort Worth.

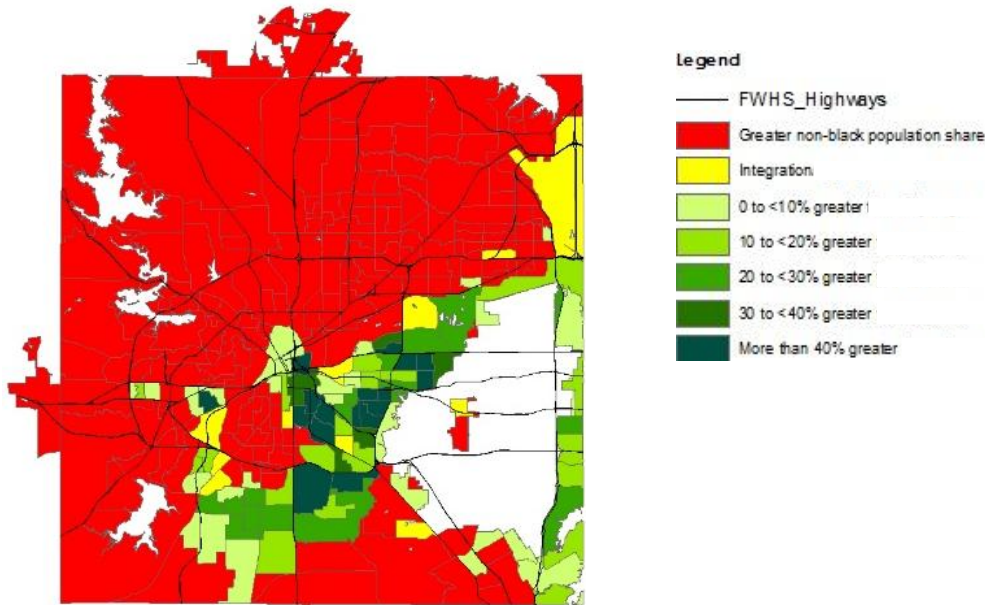


Figure 38: Black/non-black segregation, FWHS jurisdiction, U.S. Census 2010

Segregation: Hispanic vs. non-Hispanic (2010)

Figure 39 shows that the Hispanic population appears to be experiencing similar patterns of concentration to the black population but in different locations. The percentage of Hispanic residents exceeds the jurisdictional average by more than 40% in many census tracts in north and south Fort Worth inside I-820. The Hispanic population also clusters in small portions of west Fort Worth and throughout much of southeast Fort Worth.

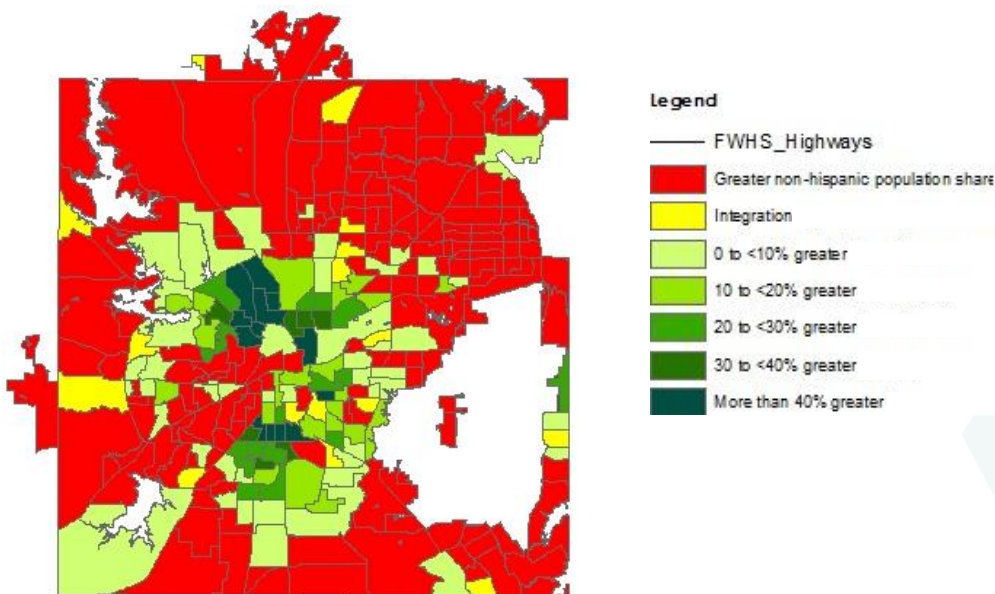


Figure 39: Hispanic/non-Hispanic segregation, FWHS jurisdiction, U.S. Census 2010

Segregation Asian or Pacific Islander (2010)

Figure 40 shows that no census tracts experience greater than a 20% difference in population proportion from the overall jurisdictional proportion of Asian or Pacific Islander residents. Most of the mild concentrations of the Asian/PI population occur in the more affluent north and northeast areas of Tarrant County. West of SH 360 and south of SH 10 a higher concentration of Asian/PI residents overlaps with a high concentration of black, lower income residents.

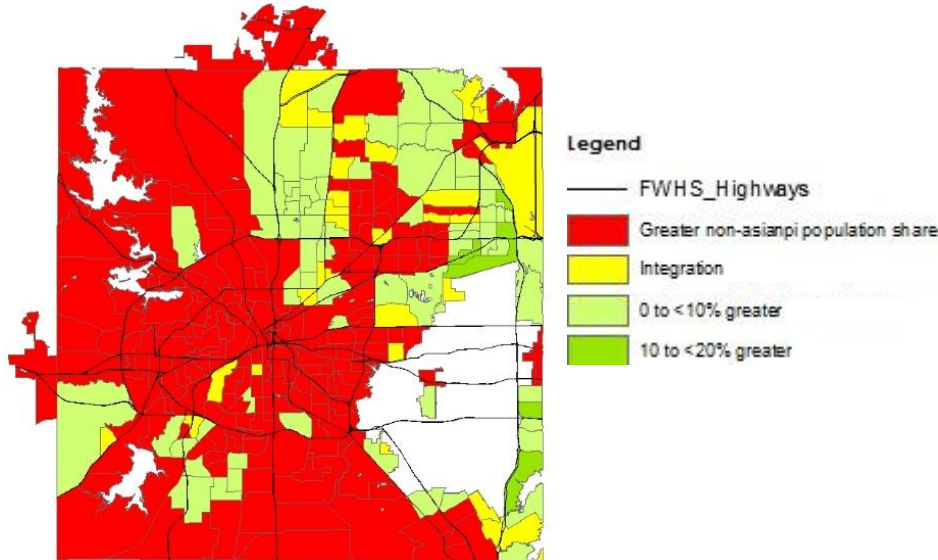


Figure 40: Asian/PI and non-Asian/PI segregation, FWHS jurisdiction, U.S. Census 2010

National origin (2010)

The most represented country of origin in the jurisdiction is Mexico, which accounts for 10% of residents. Clusters of foreign-born residents from Mexico concentrate in north and south Fort Worth inside I-820 and mirror the concentration of the Hispanic population (Figure 41). The overall residential pattern of foreign-born residents (Figure 42) generally reflects the pattern of foreign-born Mexican immigrants, except for Grand Prairie and east Fort Worth where more foreign-born Asian/PI people reside.

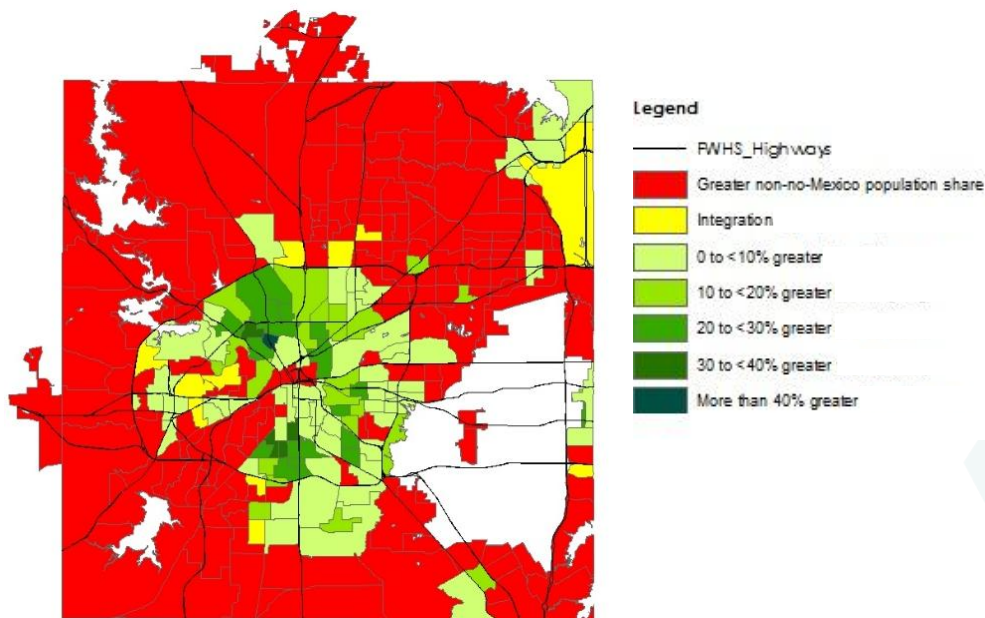


Figure 41: Percent of residents born in Mexico by census tract compared with jurisdiction average (U.S. Decennial Census 2010)

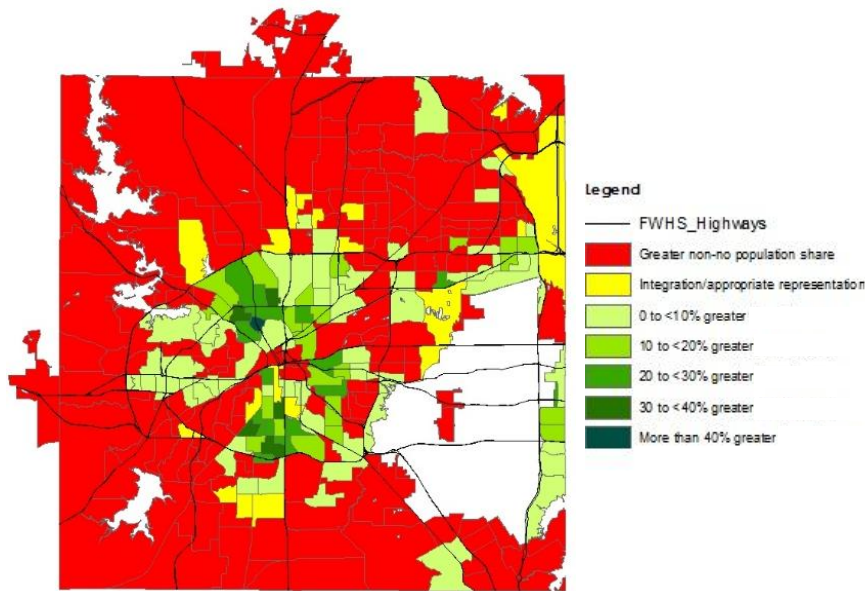


Figure 42: Percent of foreign-born residents by census tract compared with jurisdiction average (U.S. Decennial Census 2010)

Limited English Proficiency (2010)

From 1990 to 2013, the proportion of LEP residents in Fort Worth increased to 11%. The top three languages spoken by LEP residents are, in order by percent of all residents: Spanish (10.61%), Vietnamese (0.65%) and Chinese (0.35%). Figure 43 shows that the census tracts with a greater share of LEP Spanish-speaking individuals occur in north, south and southeast Fort Worth inside I-820. These areas tend to correspond to the areas with high concentrations of foreign-born residents from Mexico (Figure 41). The highest concentrations of residents with LEP speaking any language occur in northwest and south Fort Worth inside I-820 (Figure 44).

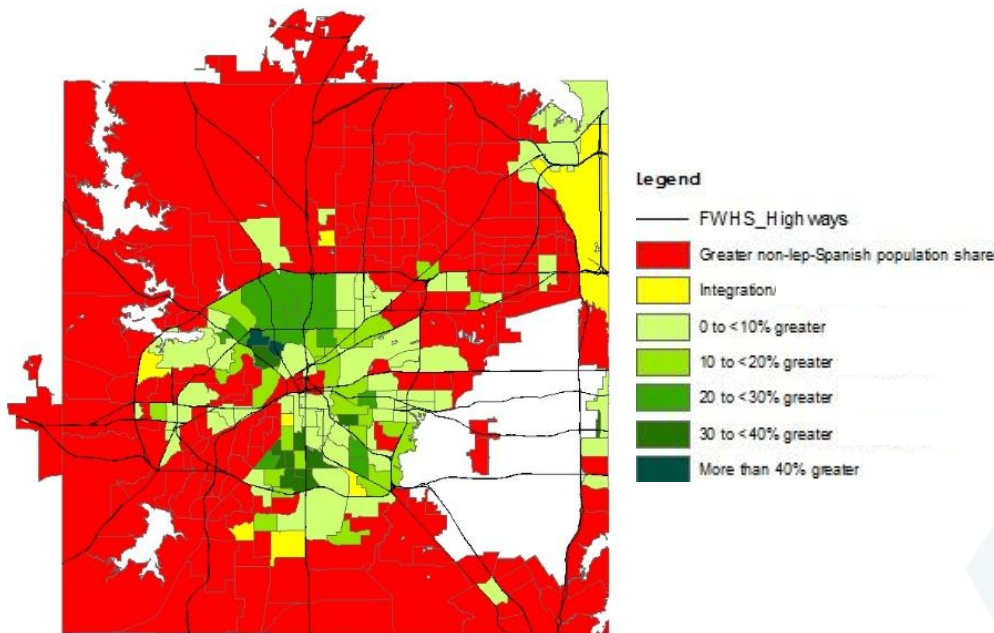


Figure 43: Census tracts with highest percentages of LEP, Spanish-speaking residents compared with jurisdiction averages (U.S. Decennial Census 2010)

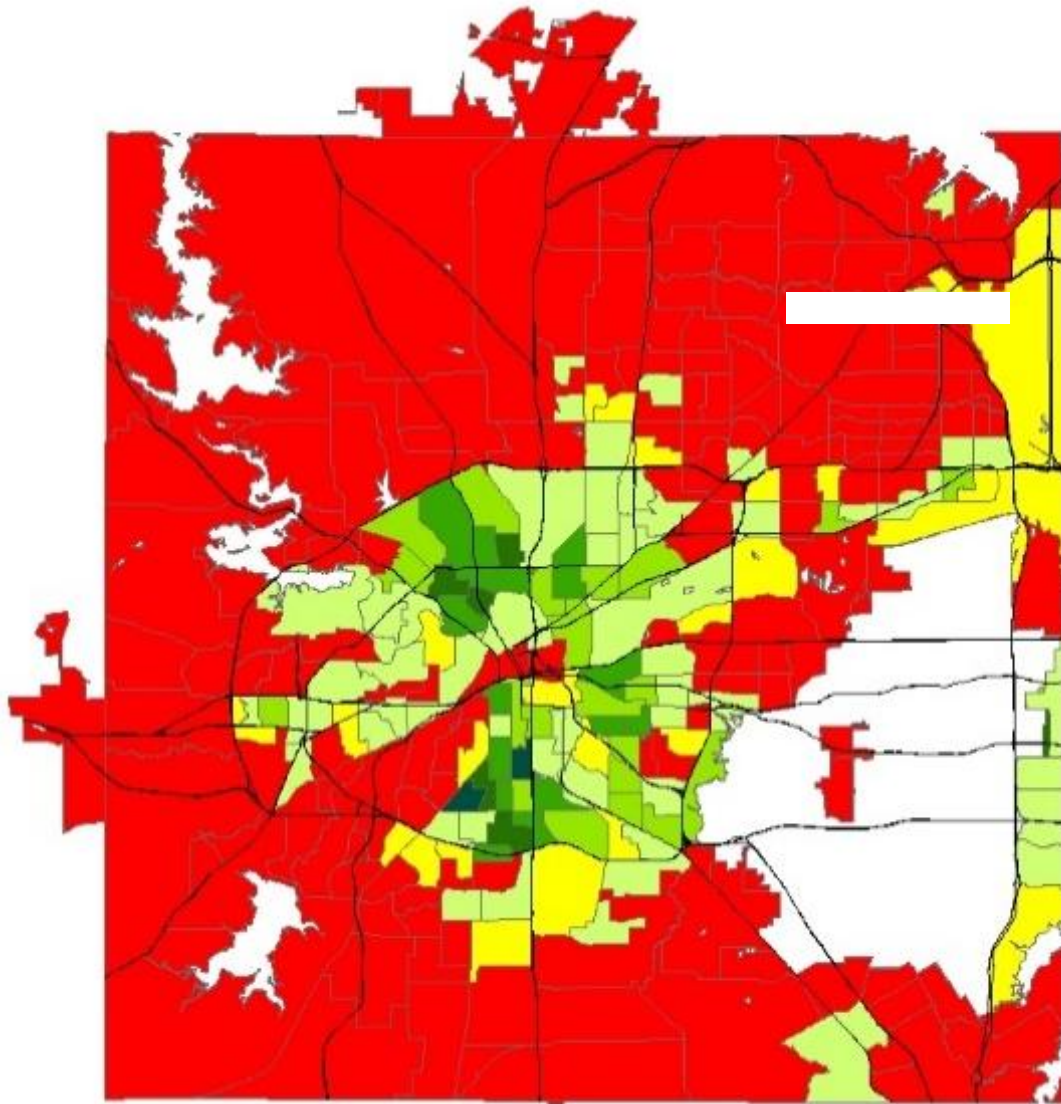


Figure 44: Share of residents with limited English proficiency (any language) by census tract compared with FWHS jurisdiction share (U.S. Decennial Census 2010)

c.

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

In Figure 45, from 1990 to 2010, dissimilarity index values indicate moderate segregation for the white/non-white populations, but the scores for FWHS have decreased. Black residents remain highly segregated but these scores also decreased during the period. The Hispanic population remained moderately segregated during the period with relatively unchanged scores. The Asian/PI residents experience low segregation throughout the period. As a whole, segregation in the jurisdiction remains similar to the region according to the dissimilarity index, except for Asian/PI residents who are less segregated in the FWHS jurisdiction than in the region. Black residents experience a high level of segregation in the region while the index score declines slightly from 1990 to 2010. The level of segregation between Hispanics and white residents remains moderate at the regional level, with a slight overall increase from 1990 to 2010. Regionally, Asian/PI residents experience moderate and increasing levels of segregation while FWHS has low segregation.

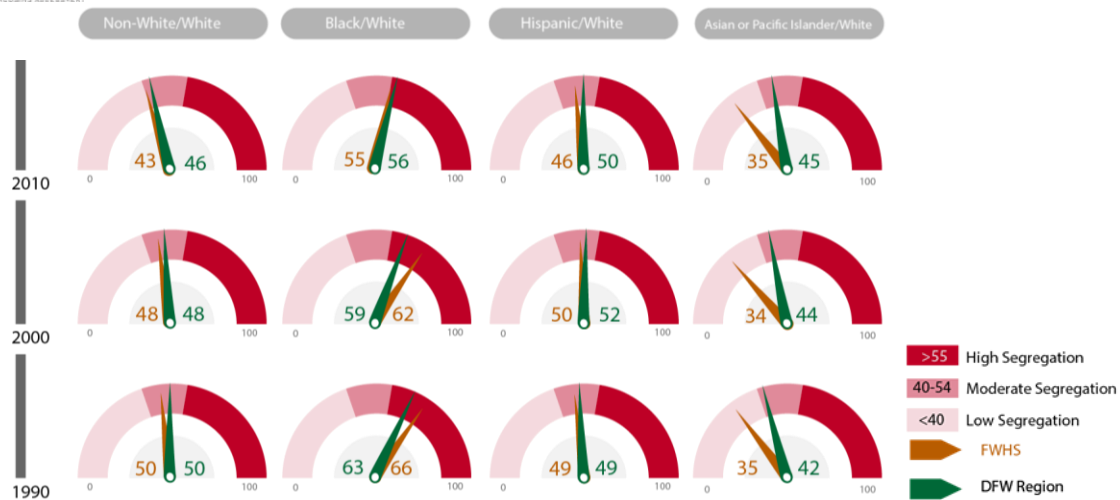


Figure 45: Dissimilarity index scores from 1990 to 2010 for FWHS jurisdiction and DFW region (U.S. Decennial Census 1990, 2000, 2010)

Spatial patterns of segregation

Spatial patterns of segregation remained consistent from 2010 to 2015. The percent of non-white residents in northwest and southeast Fort Worth continued to exceed the overall percent of non-white residents for the region by more than 40%.

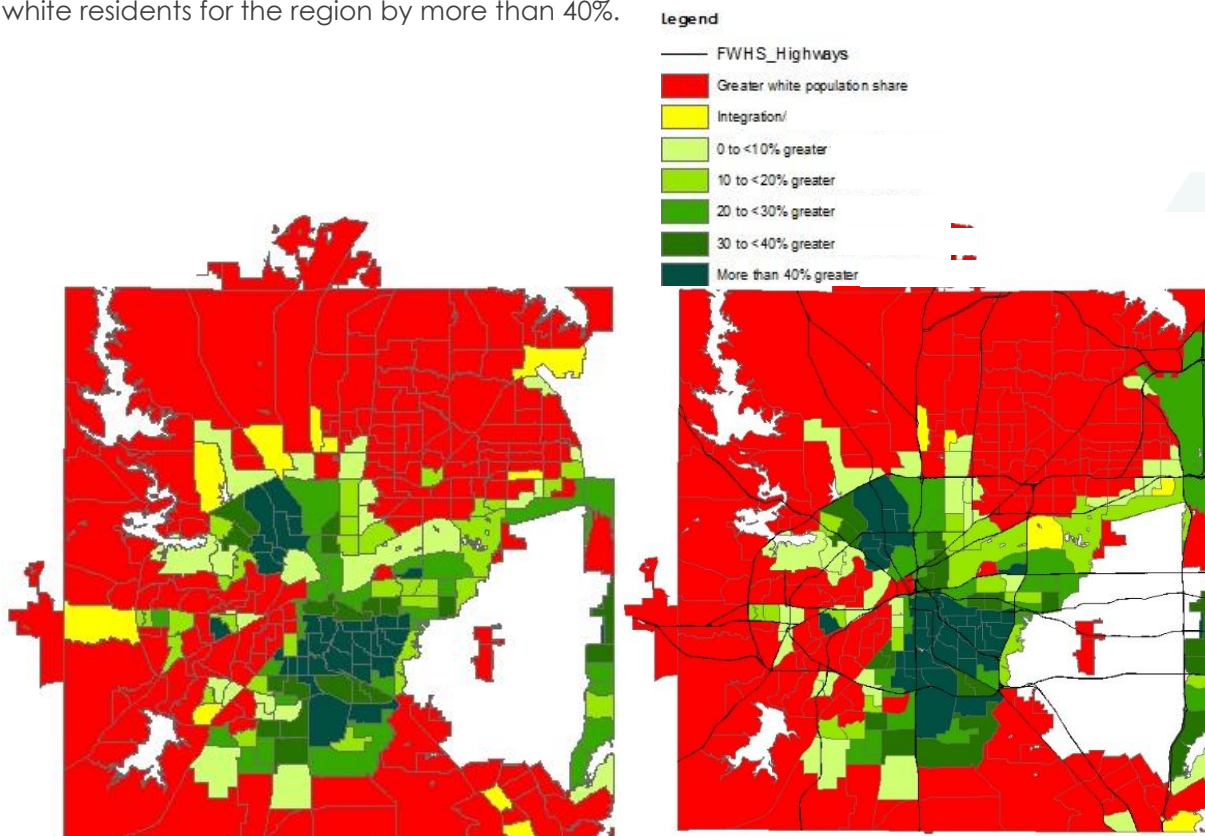


Figure 46: White vs. non-white segregation, 2010 and 2015

Segregation across the NTRHA region from 2010 to 2015 continued to be most severe in Fort Worth and Dallas.

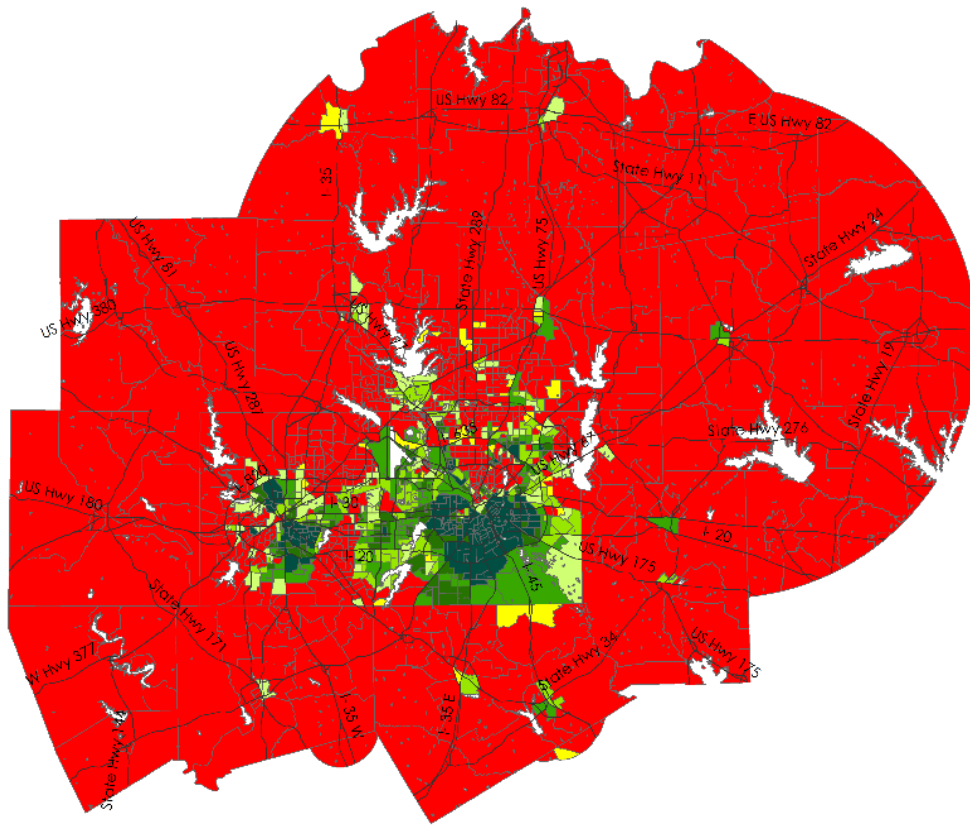


Figure 47: Segregation in the NTRHA region, 2010, U.S. Decennial Census

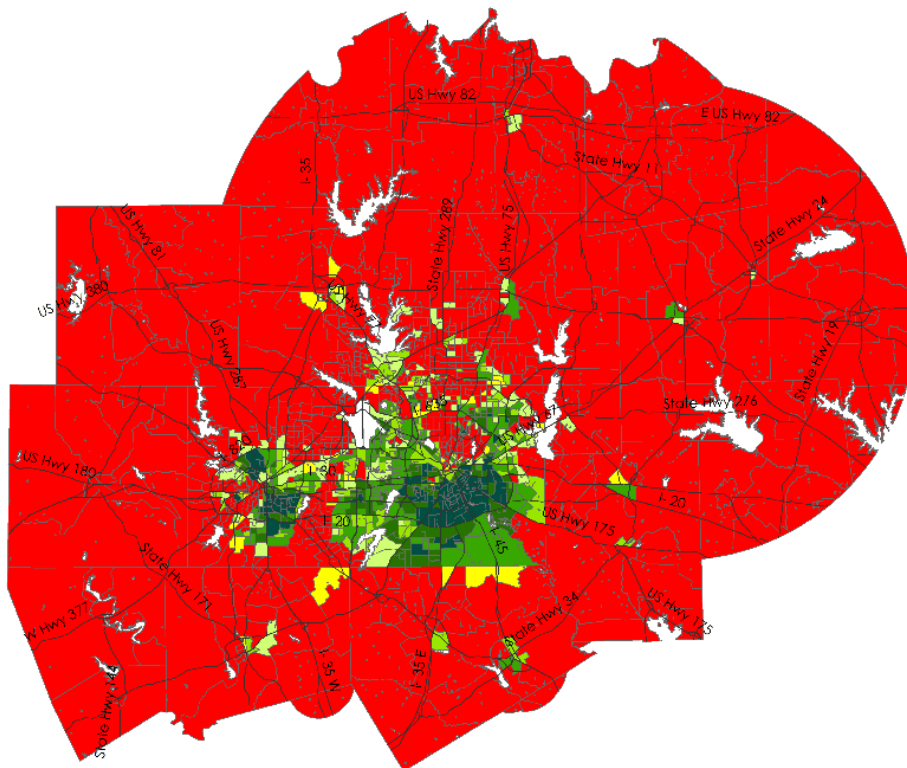


Figure 48: Segregation in the NTRHA region, 2015, U.S. Decennial Census

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

The share of residents owning their own homes in the DFW region declined from 63.8% in 2006 to 59.6% in 2013 (e.republic, 2018). Figure 49 shows the proportion of renters in the FWHS jurisdiction. Because most of Fort Worth inside I-820 experiences some level of segregation, higher proportions of renters tend to match segregation patterns. However, the most segregated census tracts in Fort Worth with high black and Hispanic populations do not match the highest percentages of renters. Homeownership appears highest in northeast and northwest Tarrant County where over 80% of residents own their homes and the residents tend to be white (Figure 50). Suburban locations with high rental concentrations tend to either be in segregated areas and/or near freeways. Rates of rental housing also appear higher in Hurst, Euless, Bedford and Grand Prairie.

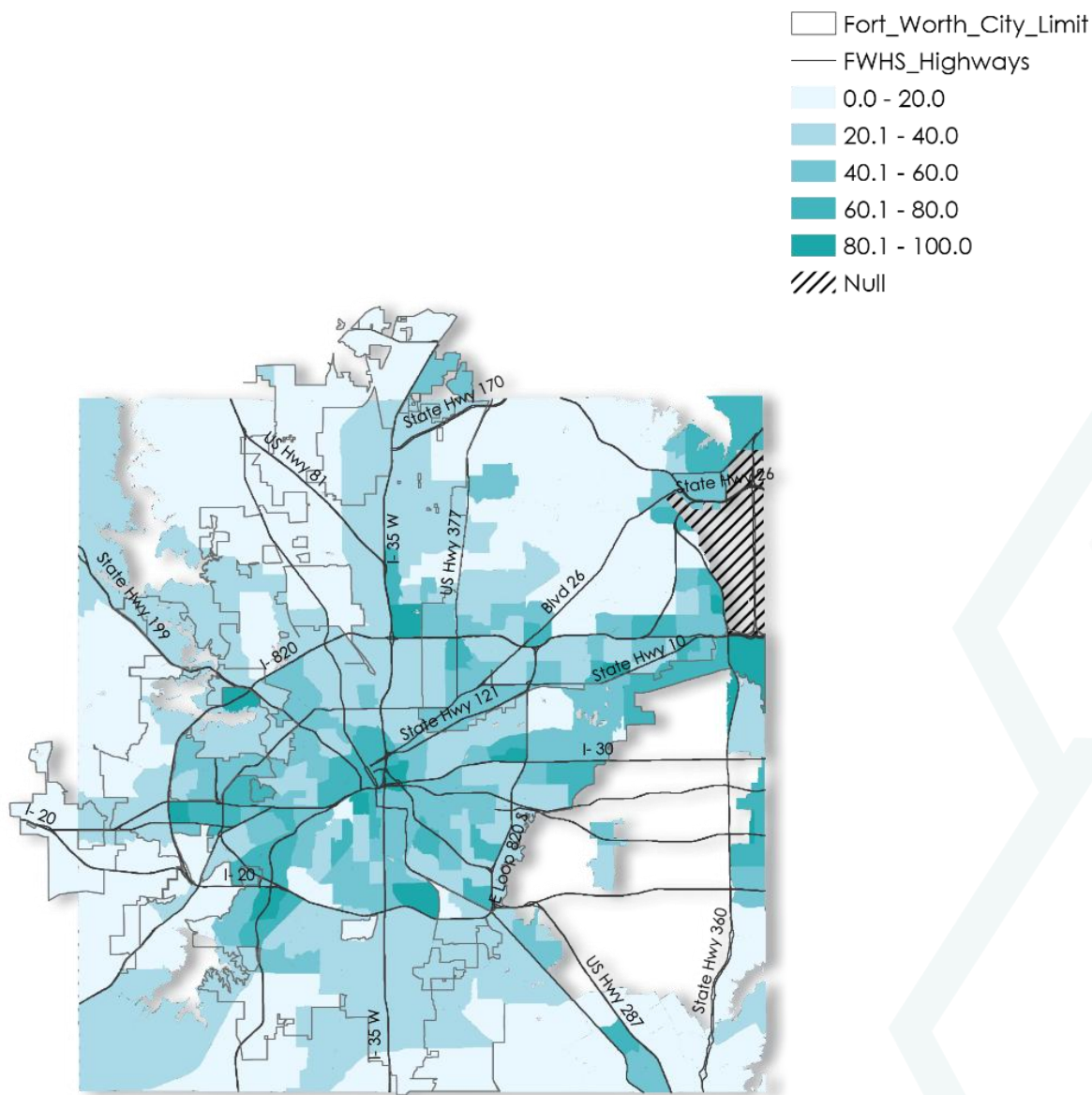


Figure 49: Percent of renters in the jurisdiction of FWHS by census tract, CHAS 2013

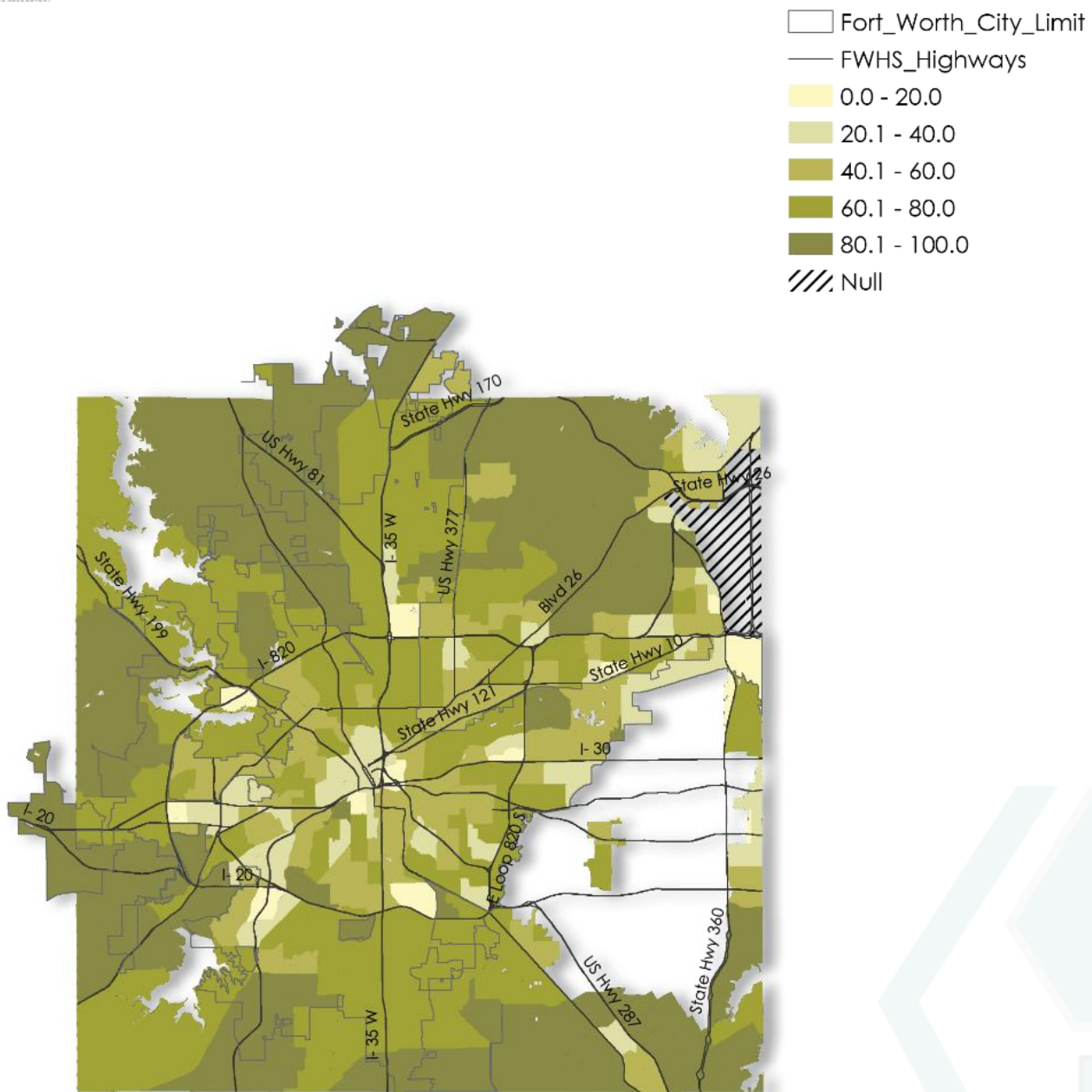


Figure 50: Percent of homeowners by census tract in FWHS jurisdiction, CHAS 2013

Figure 51 shows the proportion of renters at a regional scale. High rental concentrations occur in Dallas, Fort Worth, in the mid-cities between SH 183 and I-20 and in many suburban and rural county seats near freeways. The Red River counties have lower home ownership rates than most rural areas.

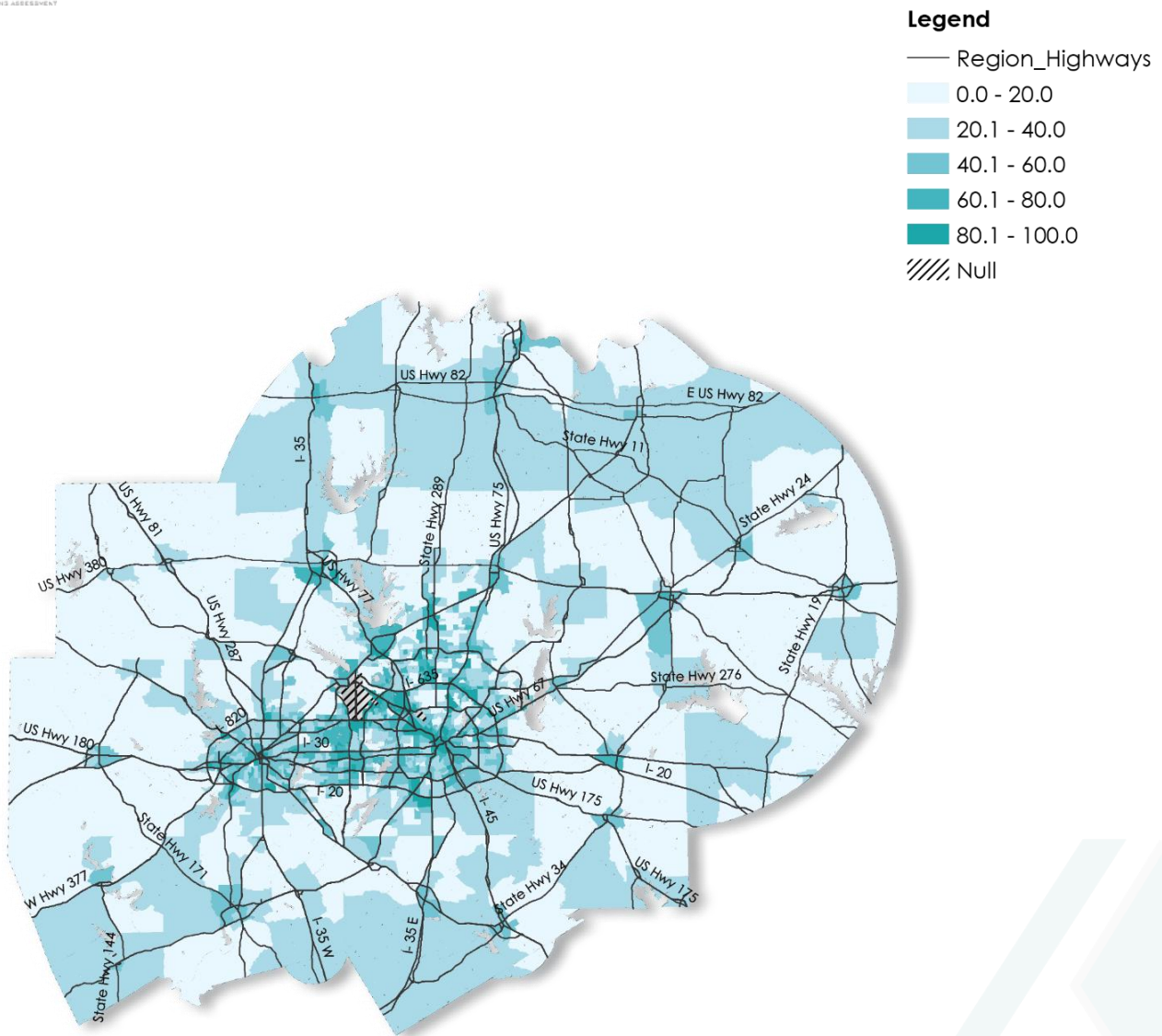


Figure 51: Percent of renter households by census tract, NTRHA region, CHAS 2013

The following tables describe the housing tenure of census tracts in the jurisdiction of FWHS with increasing levels of white to nonwhite segregation. More than two thirds of the households own homes in census tracts with higher concentrations of white residents. Census tracts where non-white residents exceed overall jurisdiction rates have more than 40% renter households. The lowest rates of rental housing are in census tracts with predominantly white and integrated populations.

Level	Definition: Census tract compared to jurisdiction
1	Greater white population share than jurisdiction
2	Census tract share matches jurisdiction
3	Up to 10% greater than jurisdiction percent
4	Up to 20% greater than jurisdiction percent
5	Up to 30% greater than jurisdiction percent
6	Up to 40% greater than jurisdiction percent
7	More than 40% greater than jurisdiction percent

Figure 52: Levels of segregation for white vs. non-white residents

Level of Segregation	% Homeowners	% Renters
1	69.2	30.8
2	65.5	34.5
3	53.1	46.9
4	46.2	53.8
5	59.1	40.9
6	53.3	46.7
7	53.3	46.7

Figure 53: Percent homeowners and renters by level of segregation of census tract, FWHS jurisdiction (CHAS 2013, U.S. Decennial Census 2010)

Level of Segregation	% Homeowners	% Renters
1	68.5	31.5
2	53.3	46.7
3	57.3	42.7
4	49.3	50.7
5	49.1	50.9
6	56.9	43.1
7	54.3	45.7

Figure 54: Percent of homeowners and renters by level of segregation of census tract, FWHS jurisdiction (CHAS 2013, ACS 2015)

Homeownership in the FWHS jurisdiction remains slightly lower than the regional level for predominantly white and integrated census tracts and higher in the most segregated census tracts. Figure 55 and Figure 56 show that predominantly white census tracts in the region have about 72% home ownership and integrated census tracts have over 55% ownership. All other categories have between 42% and 53% ownership. Home ownership appears significantly higher in census tracts where the percent of white residents exceeds the average for the region.

Level of Segregation	% Homeowners	% Renters
1	71.9	28.1
2	57.0	43.0
3	49.0	51.0
4	53.1	46.9
5	49.3	50.7
6	42.6	57.4
7	47.4	52.7

Figure 55: NTRHA regional percent of homeowners and renters by level of segregation, (CHAS 2013, U.S. Decennial Census 2010)

Level of Segregation	% Homeowners	% Renters
1	72.2	27.8
2	55.5	44.5
3	53.0	47.0
4	47.5	52.5
5	48.6	51.4
6	45.7	54.3
7	50.5	49.5

Figure 56: NTRHA regional percent of homeowners and renters by level of segregation (CHAS 2013, ACS 2015)

e.

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

The City of Fort Worth Human Relations Commission, in its annual report, expressed concern over “the repeated attempts by the Texas State Legislature to limit local municipalities from enforcing expanded anti-discrimination laws” (Fort Worth Human Relations Commission, 2017, p. 6). Participants in public engagement commented that previously diverse communities, such as Fort Worth’s Southside, are becoming less diverse, more predominantly white and higher income as the community gentrifies. Community members said that, as housing prices increase, service and support workers can no longer afford to live in the community and must go farther and farther out of the central city to afford housing. This effect disproportionately affects minorities. National research, using methods other than the dissimilarity index and focusing at the block group level, found that segregation within cities and suburbs has declined while segregation between central cities and their suburban cities has intensified, especially as metropolitan size increased (Lichter, Parisi, & Taquino, 2015).

The Fort Worth Human Relations Commission (FWHRC) received 198 fair housing complaints in 2017. Figure 57 displays the percent of total complaints received by the basis for the complaint (Fort Worth Human Relations Commission, 2017)⁵. Complaints based on race increased from 28% in FY2016 to 34% in FY2017 or 67 cases in 2017, 78% of which were based on unfair housing practices against black persons (Fort Worth Human Relations Commission, 2017).

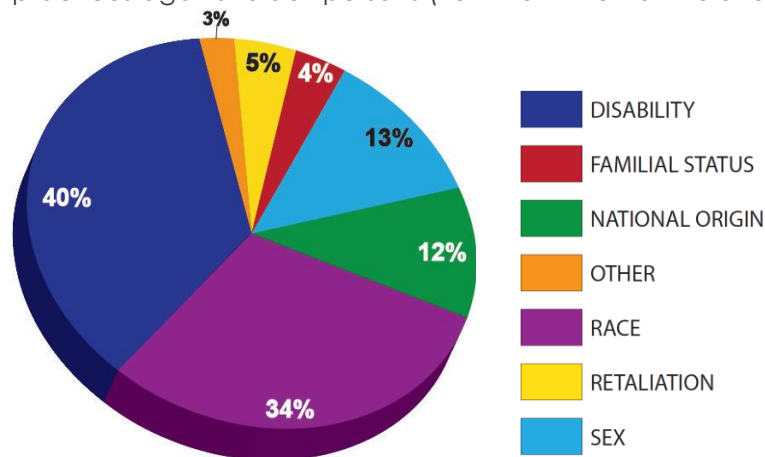


Figure 57: Fair housing complaints received by the FWHRC by type, FY2017

Ninety-seven percent of FY2017 complaints brought forward under the City’s Fair Housing Ordinance alleged discriminatory terms, conditions, privileges, services and facilities in the rental or sale of property (Fort Worth Human Relations Commission, 2017). Sixty-two percent of complaints withdrawn and/or conciliated resulted in a monetary settlement between the parties while 38% resulted in non-monetary settlements. Staff received 2,161 contacts regarding fair housing issues in FY 2017. Increases in the percent of complaints filed based on race could indicate increases in private discrimination leading toward greater segregation.

The City of Fort Worth Race and Culture Task Force engaged the National League of Cities: Race, Equity and Leadership to assess the extent to which Fort Worth city departments and agencies collected and disaggregated data by race and ethnicity (Race, Equity & Leadership (REAL): National League of Cities, 2017). The majority of agencies and departments did not disaggregate data by race and ethnicity and did not assess the impact of policies and

⁵ Percentages add to more than 100 because some complaints are based on more than one factor.

programs by race/ethnicity, gender or geography. Potential changes in department practices resulting from task force work could create change in policies and practices that foster segregation.

Current conditions that could lead to greater increases in segregation, without changes in policy starting at the state level, include:

- State and local policies that permit source of income discrimination
- State and local policies that emphasize the role of local community approval for new affordable housing projects
- State and local policies that limit the amount of available rental and multifamily housing and higher housing densities (eight units per acre and above) (Pendall, 2000)
- National and regional trends in housing prices and property valuations that exceed increases in local wages for service and support workers
- Lack of assessment during policy-making for the potential impact of policy decisions on racial and ethnic segregation
- Lack of representation of racial and ethnic minorities on boards, commissions and other policy-making bodies

Additional Information

a.

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

Single mothers with young children

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

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

Figure 58 displays census tracts with families with incomes under the federal poverty level with single mothers with children under the age of 5 (U.S. Census Bureau, 2016). Darker shades of red indicate greater numbers of single mother families with children under age 5. There are 10,389 families consisting of single mothers with children less than five years of age in Tarrant County, and 38.9% have incomes below the federal poverty level (U.S. Census Bureau, 2016).

Legend:
Data Classes
0 - 6
7 - 22
23 - 42
44 - 68
74 - 126
2016 Boundaries
County

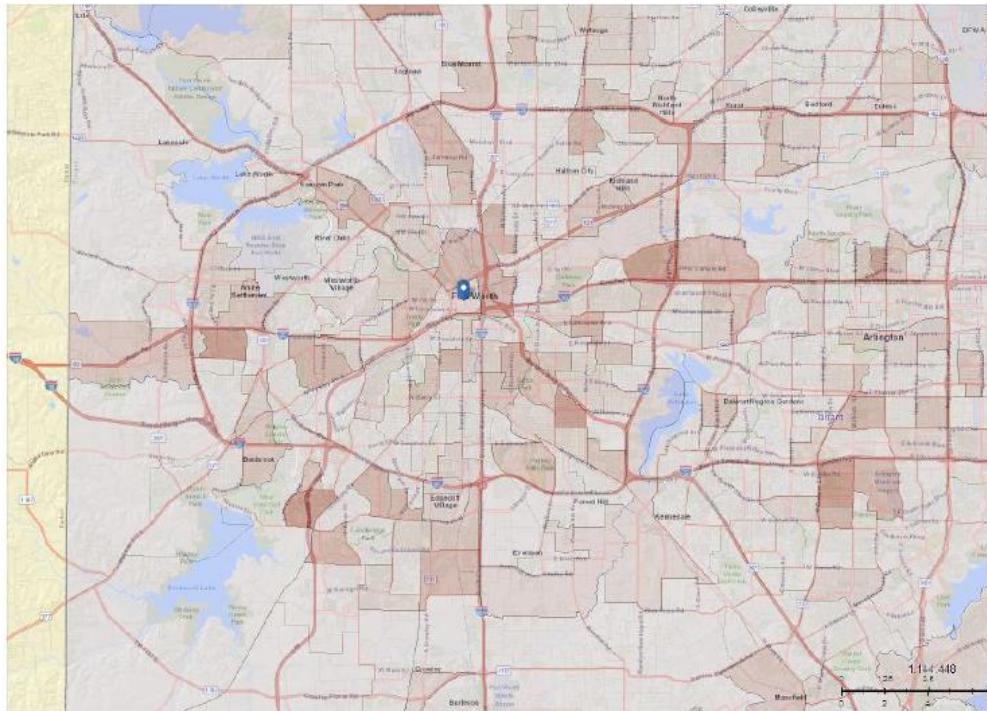


Figure 58: Number of families consisting of single mothers with children age 5 and younger with incomes below federal poverty rate with (ACS five-year estimate 2016)

Lending and segregation

A recent review of mortgage originations found no evidence of a disproportionate loan approval rate for minority applicants in the Dallas-Fort Worth metropolitan area (Glantz & Martinez, 2018). Figure 59 displays the percent of home mortgages approved by race for Tarrant County and the region. Approval rates are slightly lower for non-white applicants than white applicants, but the differences may not be statistically significant.

Race/Ethnicity	% Approved Tarrant County	% Approved Region
Not Hispanic	93.2%	93.4%
White	93.2%	93.3%
Asian	93.0%	94.4%
Pacific Islander	89.3%	90.4%
Black	89.2%	89.1%
Hispanic	89.1%	89.2%
Native American	88.2%	89.2%

Figure 59: Percent of mortgages approved by race/ethnicity, HMDA data 2017

Home mortgage loan originations for purchase and refinancing revealed a spatial pattern in the Dallas-Fort Worth metropolitan area in some reports. A review of the Urban Institute's interactive map of Home Mortgage Disclosure Act data for Tarrant County, displayed in Figure 60, finds approximately 10 mortgage originations for black households in 2016 within the central city and southeast Fort Worth (Bai, Ganesh, & Williams, 2017).

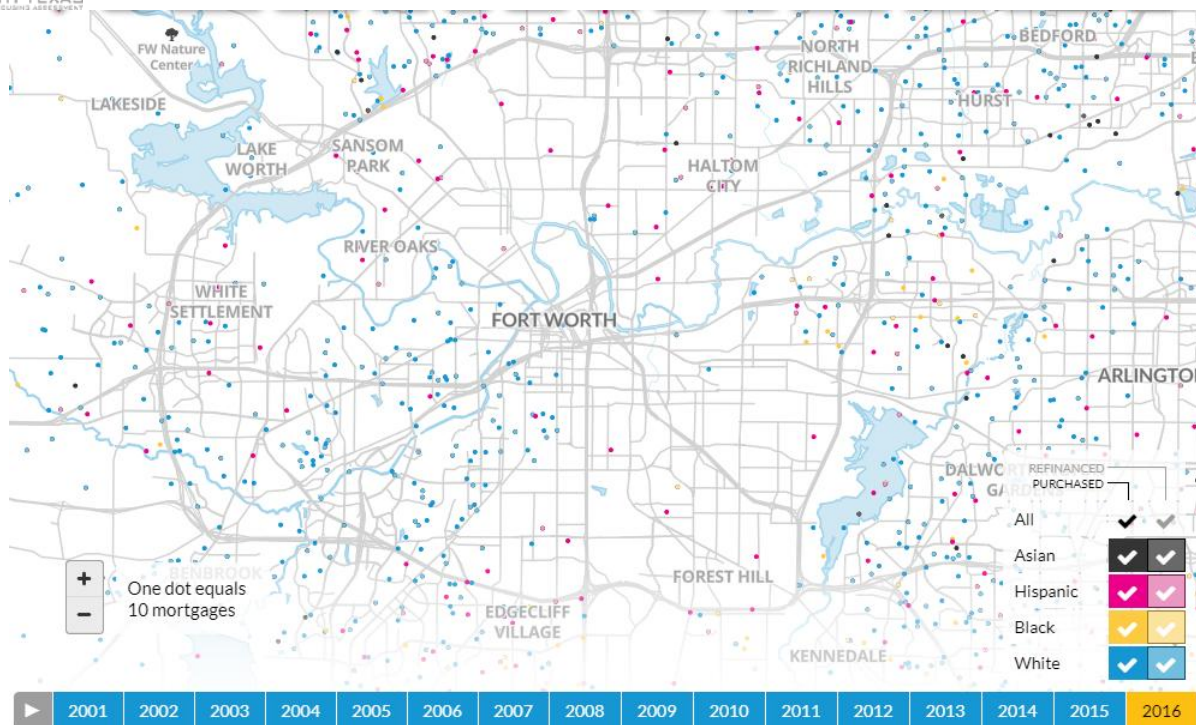


Figure 60: 2016 mortgage originations by race/ethnicity (Urban Institute)

White household mortgage originations predominate in southwest Fort Worth with none in southeast Fort Worth (inside I-820). Hispanic loan originations concentrate in far southwest Fort Worth and northeast Fort Worth but most frequently outside the I-820 loop. Black loan originations occur in the area outside the central city between Benbrook, Forest Hill and Burleson. Southeast Fort Worth, a higher poverty and higher minority community, has almost no loan originations. Loan originations for black households in the Dallas-Fort Worth metropolitan area tend to concentrate south of Dallas, Arlington and Fort Worth, particularly south of I-20. Mortgage originations for minority borrowers peaked just before the great recession and have declined more severely than for white borrowers with the post-recession tightening of credit requirements. Minority borrowers, disproportionately represented in the group of borrowers with FICO scores below 660, have been far less able to benefit from the recovery and build wealth through home ownership (Goodman, Zhu, & George, 2015). Black households in the DFW metropolitan area have not made gains in homeownership rates since the 1980s, trailing white households nationally by more than 30 percentage points (McCargo & Strochak, 2018).

Home mortgage loan denials are analyzed by reason (for the denial) for the DFW region in Figure 61 and for Tarrant County in Figure 62 (Federal Financial Institutions Examination Council, 2016). Debt-to-income ratio and poor credit history are the top two reasons for denial for every racial classification, with poor Credit history as the number one reason in three of the five race categories in the region. Credit History and debt-to-income ratio account for an average of 27% and 28% of denials respectively. Poor credit history represents the number one reason for denial in all race and ethnic categories in Tarrant County except Asian, for whom the top reason for denial is debt-to-income ratio. Twenty-nine percent of applications overall are denied based on poor credit history in Tarrant County.

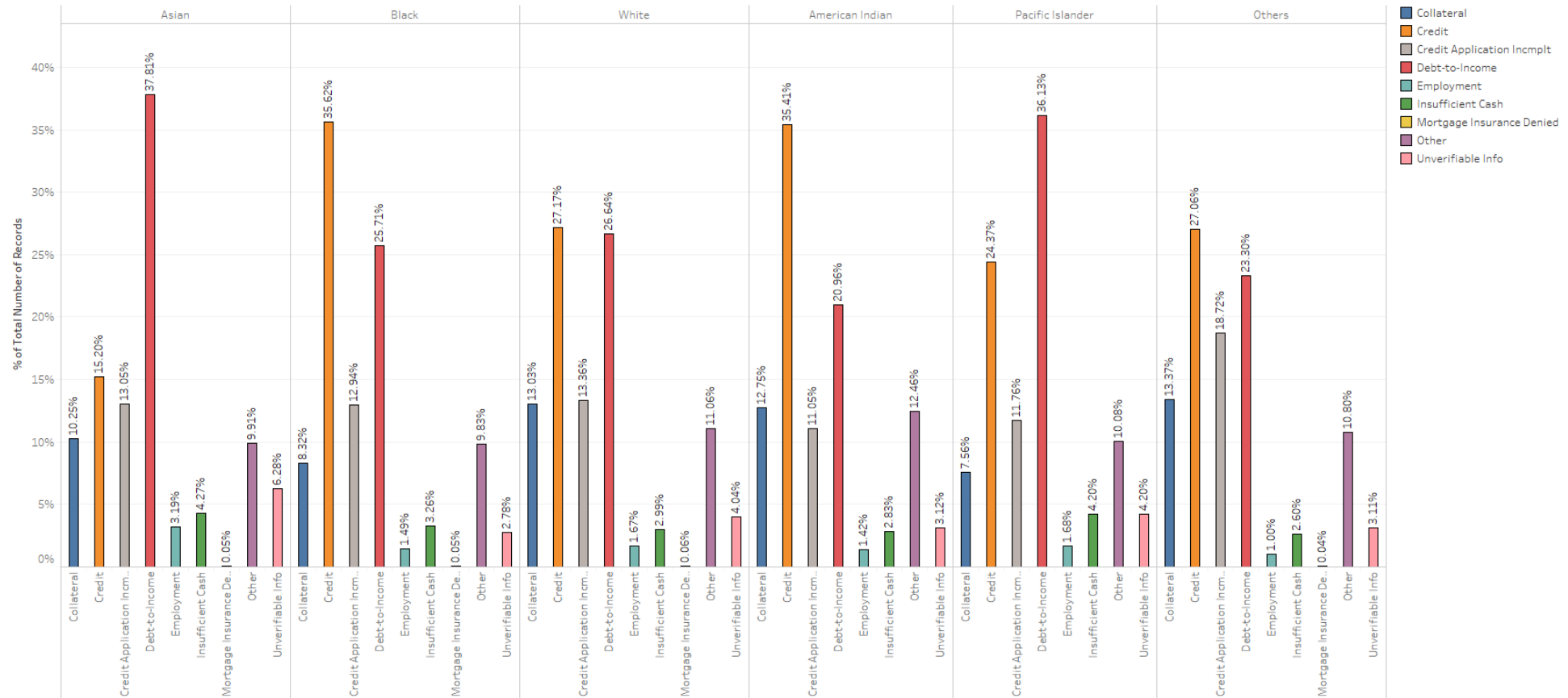


Figure 61: Percent of home mortgage loans denied sorted by race for the DFW MSA 2016 (FFIEC)

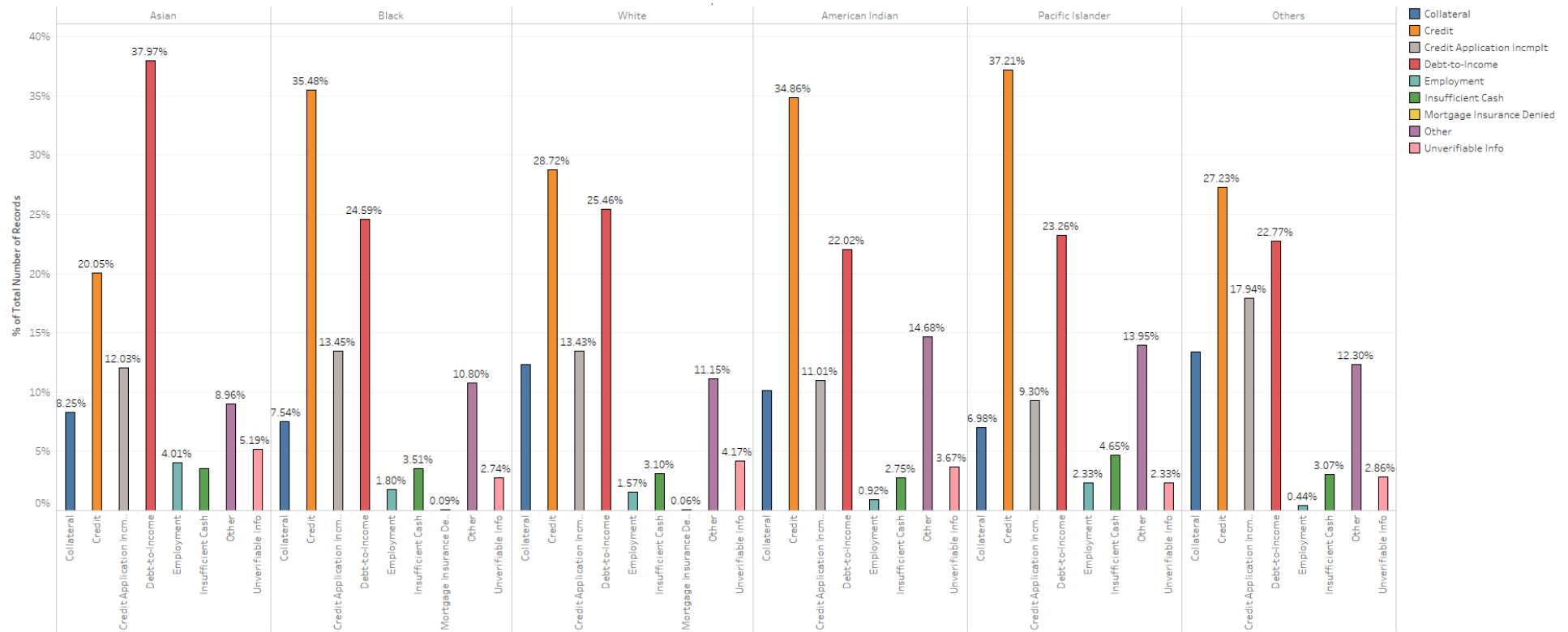


Figure 62: Percent of home mortgage loans denied sorted by reason by race 2016 Tarrant County (FFIEC)

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

Place and segregation

Fort Worth has deep roots as a racially segregated community originally settled by white southerners who brought their slaves with them (Selcer, 2012). Blacks originally lived along the Trinity River bottoms in shantytowns. Segregation was strictly enforced well into the 1960s. Fort Worth schools were desegregated in 1967, 13 years after the Brown vs. Board of Education ruling made segregated classrooms illegal (Kennedy, 2017). The first middle class black neighborhood, Terrell Heights, was formed southeast of the City's "red light" district known as Hell's Half Acre (City of Fort Worth, 2018). Poor black people lived on the eastern edge of the City (Selcer, 2012). Another middle class black community formed in the 1920s around Lake Como on the southwest side of Fort Worth, where lived black people who served wealthy white families in the nearby Arlington Heights neighborhood. The Public Works Administration provided for the funding in 1941 of the City's first public housing, including Ripley Arnold for poor whites located in the downtown area west of the Courthouse and a property for poor blacks known as H. H. Butler Place on the eastern edge of downtown adjacent to Hell's Half Acre and the Trinity River bottoms. Figure 63 shows the locations of these three historically black communities (blue markers).

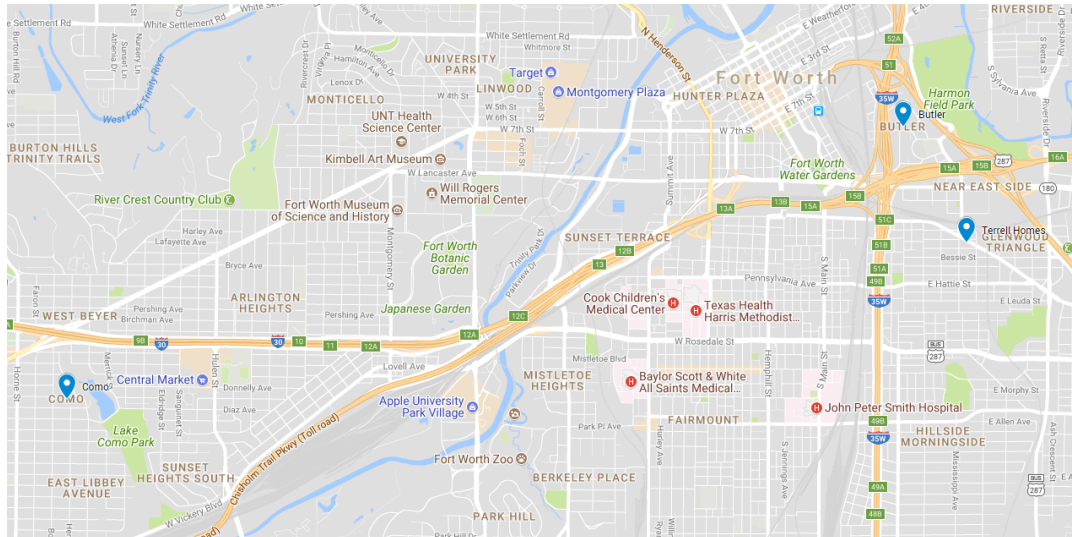


Figure 63: Historically segregated black communities in Fort Worth

These communities continue to be home to concentrations of minority households in Fort Worth. Figure 64 shows race, ethnicity and poverty rates for the Terrell, Butler and Como communities (United States Census Bureau, 2016). All three communities significantly exceed the averages for Tarrant County in percent of households with incomes below the poverty level and percent of population claiming a black racial heritage. Terrell Heights is shifting to a predominantly Hispanic population. All three communities are 80% to 90% non-white/Hispanic compared with fewer than 50% non-white or Hispanic for Tarrant County.

Community	Census Tract	% Poverty	% Black	% Hispanic
Terrell Heights	1231	50%	39%	52%
Butler Place	1017	79%	51%	28%
Lake Como	1025	45%	64%	30%
Tarrant County		14%	17%	28%

Figure 64: 2016 demographics for historically black communities in Fort Worth

Participants in community engagement from east and south Fort Worth identified deteriorated and abandoned properties as an extremely important contributing factor to addressing segregation (City of Fort Worth, 2017). Over 70% of black participants from the south, east and central city sectors rated deterioration and community revitalization as extremely important contributors to segregation/integration.

FWHS uses place-based investments coupled with affordable housing interventions to address areas of deterioration. FWHS is contributing to place-based investments through its participation in the HUD Rental Assistance Demonstration program. RAD was created to “give public housing authorities (PHAs) a powerful tool to preserve and improve public housing properties and address the \$26 billion nationwide backlog of deferred maintenance” (U.S. Department of Housing and Urban Development, 2018). FWHS has received approval to convert essentially all of its aging public housing through a combination of rehabilitation, demolition and reconstruction (Fort Worth Housing Solutions, 2017). Hunter Plaza, a 1954 hotel bought by the Fort Worth Housing Authority in 1971 and converted to public housing, was the first property to be completely renovated (Nagy, 2016). Residents vacated Hunter Plaza in 2010 after an infestation of bedbugs became impossible to remediate due to the age and condition of the property. Figure 65 pictures the renovated property and its considerable presence on the western edge of the central business district. FWHS gutted and renovated Hunter Plaza into a mixed-use property featuring 164 apartments and 10,000 square feet of ground floor space for retail and other commercial uses (Mitchell, 2017). The property added 49 market-rate units to create a mixed-income community, maintaining most of the units as affordable housing, giving lower income residents access to an increasingly high quality of life in the downtown business district.

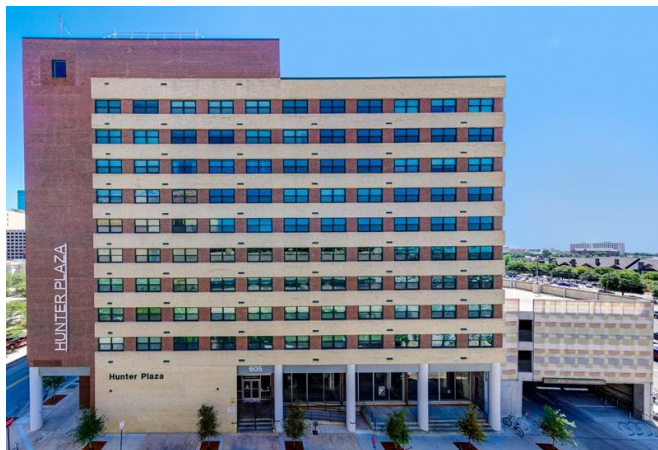


Figure 65: Hunter Plaza 2016 following rehabilitation

The Hunter Plaza redevelopment project differed significantly from FWHS's approach to redeveloping the older Ripley Arnold public housing property, also located on the northwest side of the central business district. FWHS sold the aging property in 2002, which eventually became the site of the Tarrant County College flagship Trinity River Campus (Tarrant County College District, 2013). Most residents of Ripley Arnold received vouchers to relocate to a variety of locations throughout the City, including mixed-income, lower poverty neighborhoods. Residents said their greatest regret in relocating was losing access to the amenities of downtown Fort Worth with strong access to transportation (Intermodal Transportation Center), retail, jobs and recreation in a walkable community that had been in the process of redevelopment since the late 1970's beginning with Sundance Square (Lucio & Barrett, 2010). The Hunter Plaza redevelopment allows public housing residents to stay in a very desirable community.

Redevelopment of the 41-acre Butler Place public housing project is FWHS's largest RAD project. The area is a racially and ethnically concentrated area of poverty and residents reported

concerns about serious physical deterioration and crime during public engagement events. FWHS is gradually moving residents to its own, new mixed-income affordable properties throughout the community. Figure 66 pictures some of the 68 red brick buildings built in 1940 that make up the 412 units in Butler Place. The property is located adjacent to the redevelopment of I.M. Terrell, once a segregated high school for black students, (the beige buildings pictured in the distance) (Mauch, 2016). I.M. Terrell is now the Fort Worth Independent School District's site for science, technology, engineering, arts and math, after rehabilitation and substantial new construction (STEAM).



Figure 66: Butler Place FWHS public housing

Columbia Renaissance in southeast Fort Worth is a successful example of master planning to redevelop a racially and ethnically concentrated area of poverty. FWHS provided project-based vouchers to the Columbia Renaissance Apartments, a mixed-income affordable housing project, in support and on the strength of the revitalization (Figure 67). The Renaissance project is located in a high-poverty neighborhood where 99.5% of the residents are non-white, including approximately 60% black and 40% Hispanic residents (United States Census Bureau, 2016). The area had aging housing stock, high property vacancy rates, lack of quality retail such as grocery stores with fresh food and a high concentration of unwanted uses such as pawnshops and convenience stores selling alcohol (Harral, 2015). Affordable housing can combat gentrification and form an important part of comprehensive place- and people-based revitalization projects like Columbia Renaissance that include investment in housing and real estate, support for increased family income and wealth (jobs), economic development (new businesses), improved access to quality education and supportive of healthy lifestyles (Randall, 2016).

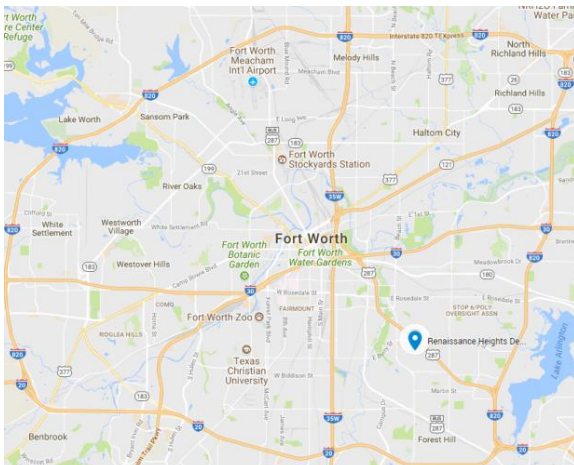


Figure 67: Location of Renaissance Heights, blue marker

The developer's plan for the 200-acre site started with quality retail anchored by the largest Walmart grocery and department store in the City of Fort Worth. The developer met with community members to identify needs and eventually adopted the Purpose Built Communities model of neighborhood revitalization that included bringing in a charter school, YMCA recreation center and children's healthcare clinic, in addition to 330,000 square feet of retail space and accompanying jobs (Purpose Built Communities, 2018). The master plan, shown in Figure 68, won the participation of the City of Fort Worth and the establishment of a Tax Increment Financing agreement to provide revenue for infrastructure.



Figure 68: Renaissance Master Plan

The project includes three phases of mixed-income affordable housing with 500 units, including apartments, single-family, townhomes and senior housing (Harral, 2015). Phase I (140 units) completed in 2018. Subsequent phases include the support of the City of Fort Worth HOME funds, Low Income Housing Tax Credits (LIHTC) and Project-based vouchers from FWHS (Goldberg, 2016).

The City of Fort Worth, in its 2017 budget, allocated \$2.56 million to addressing crime, pedestrian safety and aesthetics to leverage additional public and private investment in the Stop Six neighborhood in east Fort Worth. The city identified the project as the first in its Neighborhood Improvement Strategy (City of Fort Worth, 2018). The City has begun to monitor 26 Neighborhood Profile Areas and selects areas for investment based on metrics targeted at access to opportunity. Goals include long-term economic revitalization. The Stop Six Neighborhood Profile Area, pictured in Figure 69, is a historically black southeast Fort Worth community anchored on the northern edge by Cavile Place, a 1960 300-unit public housing project owned by FWHS (CoStar Group, Inc., 2018; Ratigan, 2016). The neighborhood is a racially and ethnically concentrated area of poverty with 69% black and 23% Hispanic residents (United

States Census Bureau, 2016). FWHS has applied to HUD for permission to demolish and dispose of the aging Cavile Place requesting 300 tenant protection vouchers to help with relocation of current residents. FWHS will seek to redevelop the property in the spirit of the 2013 transformation plan developed with the City of Fort Worth and other stakeholders.

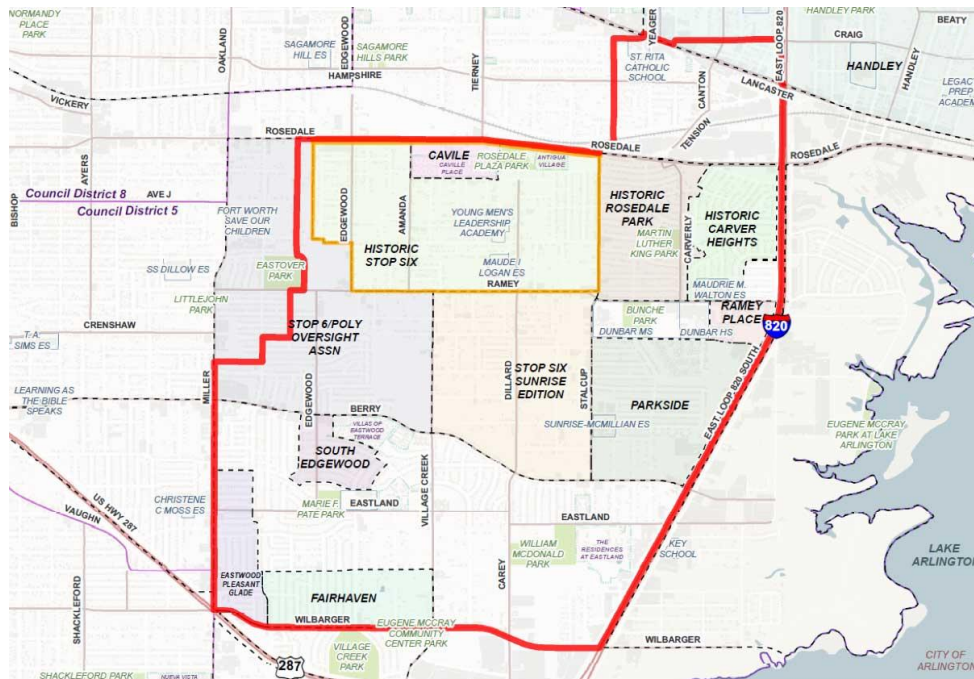


Figure 69: Stop Six Neighborhood Profile Area, City of Fort Worth

Community Reinvestment Act

The Community Reinvestment Act (CRA) was created to prevent redlining and encourage banks to provide financial services that meet the needs of their communities (Federal Financial Institutions Examination Council, 2015). Redlining is denying or using methods to increase the cost of banking to residents of racially distinct neighborhoods that can lead to high amounts of segregation (Office of the Comptroller of the Currency, 2018). Banks, credit unions and other financial institutions are encouraged to tailor financial offerings/programs to the needs of the entire community in which they operate, including meeting the needs of residents in low- and moderate-income neighborhoods (Office of the Comptroller of the Currency, 2014). The CRA was also created to assist in rebuilding and revitalizing communities and provides a framework for financial institutions and community organizations to collaborate to promote the availability of different types of credit and banking services for low- and moderate-income neighborhoods and residents. The CRA achieves this by encouraging financial institutions to “open new branches, provide expanded services and make a variety of community development loans and investments. In addition, CRA has encouraged banks to provide substantial commitments to state and local governments and community development organizations to increase lending to underserved segments of local economies and populations” (Office of the Comptroller of the Currency, 2014, p. 1).

Figure 70 shows the total value of the CRA loans made to small businesses by institutions in Tarrant categorized by the median family income of the business applicant's census tract. Columns two through four categorize the total amount loaned by the size of the loan. Column five shows the amount of money loaned to small businesses (revenue less than or equal to \$1 million). Thirty-eight percent of Tarrant County CRA dollars loaned went to businesses located in census tracts where family incomes are greater than 120% of the area median income for the

DFW MSA⁶. Seven percent of CRA dollars went to communities with median incomes below 50% area median income. Fewer CRA dollars going to lower income census tracts disproportionately affect minority residents who are more likely to live in census tracts with lower median incomes.

Community	Loan Amount at Origination			Loans to Businesses with	TOTAL	TOTAL
% of Area Median Family Income	<=	> \$100,000	>	Gross Annual Revenues	Dollars Loaned	% of Dollars Loaned
	\$100,000	But <= \$250,000	\$250,000	<= \$1 Million		
Tarrant County	(000s)	(000s)	(000s)	(000s)	(000s)	(000s)
10-20%	\$697	\$531	\$750	\$1,110	\$3,088	0.2%
20-30%	\$3,355	\$2,081	\$13,817	\$2,557	\$21,810	1.1%
30-40%	\$9,693	\$7,103	\$26,654	\$11,985	\$55,435	2.8%
40-50%	\$12,175	\$4,992	\$28,945	\$12,585	\$58,697	2.9%
50-60%	\$53,066	\$33,609	\$121,654	\$66,530	\$274,859	13.6%
60-70%	\$23,666	\$10,029	\$43,056	\$28,116	\$104,867	5.2%
70-80%	\$27,969	\$12,405	\$35,313	\$24,295	\$99,982	5.0%
80-90%	\$39,903	\$17,896	\$68,176	\$34,466	\$160,441	8.0%
90-100%	\$36,607	\$15,556	\$45,920	\$39,824	\$137,907	6.8%
100-110%	\$40,775	\$24,899	\$67,384	\$43,215	\$176,273	8.8%
110-120%	\$36,511	\$14,176	\$38,257	\$38,818	\$127,762	6.3%
>= 120%	\$199,865	\$77,911	\$267,253	\$225,401	\$770,430	38.2%
MFI Not Known	\$754	\$375	\$1,679	\$233	\$3,041	0.2%
Tract Not Known	\$10,771	\$1,247	\$1,289	\$6,482	\$19,789	1.0%
	\$495,807	\$222,810	\$760,147	\$535,617	\$2,014,381	

Figure 70: CRA loans by median family income of community 2016, Tarrant County (FFIEC)

Mobility and place

Recent research examining intergenerational economic mobility finds that low-income children, especially under age 13, do better economically as adults than their parents if they are able to grow up in neighborhoods that are less segregated and have less concentrated poverty, better schools, lower crime rates, less income inequality and more two-parent families (Chetty & Hendren, 2017; Chetty, Hendren, Kline, & Saez, 2014). Research also finds that a child's economic prospects differ based on where she grows up. Figure 71 uses predictive data from research by Chetty and Hendren (2017) to show the effect of growing up in Tarrant County on annual income in adulthood for children from families with different household incomes (Aisch, Butth, Bloch, Cox, & Quealy, 2015). Children earn higher incomes as adults if they grow up in Tarrant County compared with the average U.S. county⁷.

⁶ No loans were recorded in Collin County in census tracts with median family incomes below 30% of area median income or between 40% and 50% of area median income.

⁷ For this analysis, poor families are defined as those with incomes of \$30k or less, average families have incomes of \$60k, rich kids come from families with \$100k in family income and the top 1% come from families with more than \$500k in annual income (Bai, Ganesh, & Williams, 2017).

What a Childhood in Tarrant County Does to Future Income

For poor kids			For average-income kids			For rich kids			For kids in the top 1%		
GROUP	INCOME CHG.	NAT. PCT.	GROUP	INCOME CHG.	NAT. PCT.	GROUP	INCOME CHG.	NAT. PCT.	GROUP	INCOME CHG.	NAT. PCT.
All kids	+\$80	39%	All kids	+\$370	41%	All kids	+\$650	44%	All kids	+\$810	46%

Figure 71: Variation in annual adult income for persons growing up in Tarrant County compared with average U.S. counties

Housing authority voucher location and segregation

Housing Choice Voucher (HCV) users have the opportunity to choose where they want to live. Geographic analysis shows that HCV users tend to concentrate in certain census tracts. Almost 5,000 (5,442) FWHS vouchers were used in 55% of the census tracts within its jurisdiction in 2017⁸. Fifty percent of FWHS vouchers were used in just 22 census tracts. Figure 72 identifies the census tracts with the most vouchers (colored red and orange).

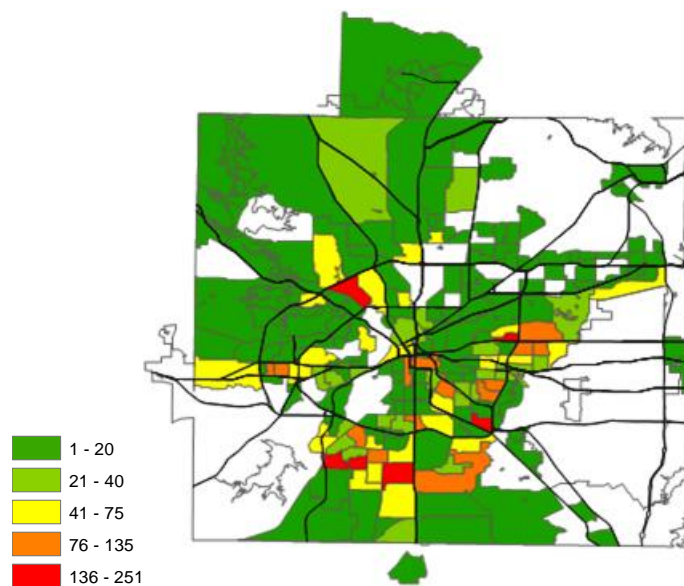


Figure 72: Location of FWHS Housing Choice Vouchers

Figure 73 shows areas with the highest levels of white/non-white segregation in the jurisdiction. Areas colored red are census tracts in which the white population exceeds the average for the entire jurisdiction. Areas shown in progressively darker shades of green show census tracts where the percent of non-white residents exceeds the jurisdiction average by greater amounts. The darkest shade of green highlights census tracts where the percent of non-white residents exceeds the average for the jurisdiction by greater than 40%. Many of the census tracts in Figure 72 colored orange and red are the same as census tracts colored dark green in Figure 73, indicating that higher concentrations of voucher holders tend to be concentrated in areas of higher racial and ethnic segregation. Census tracts with HCVs have an average value of 58% non-white, Hispanic residents. Census tracts without HCVs have an average value of 30% non-white, Hispanic residents (ACS 2015). An average of 82% of residents are non-white or Hispanic in census tracts where 10% or more of the renter households use HCVs.

⁸ Maps of the FWHS jurisdiction include all of the City of Fort Worth and all of Tarrant County with the exception of Arlington. Arlington is shown as a blank area on the map to the southeast. Blank areas on the voucher maps indicate where no FWHS vouchers are located.

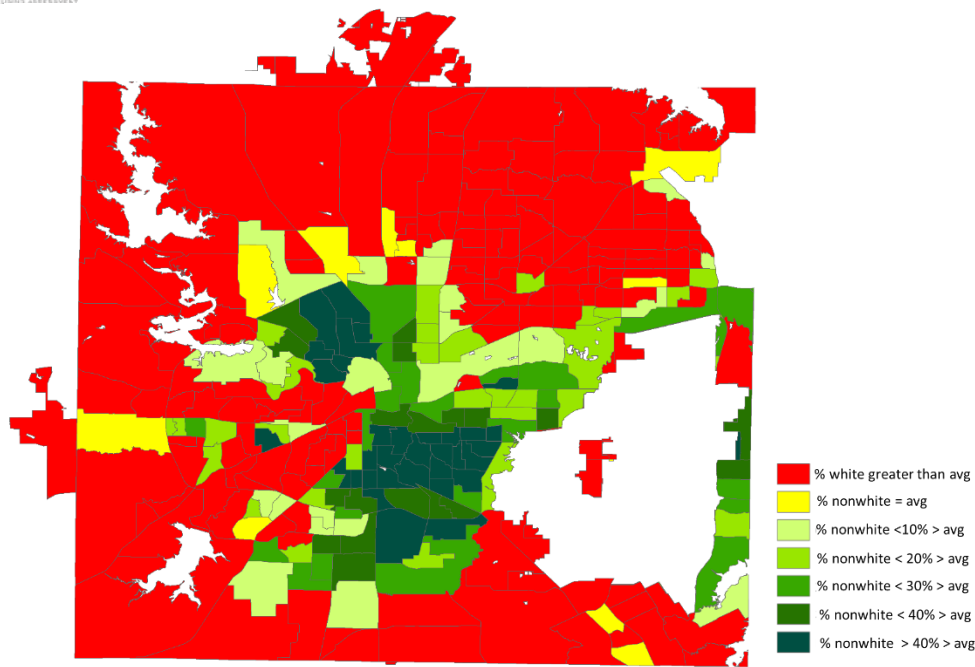


Figure 73: White/non-white segregation FWHS jurisdiction

Combined effect of overlapping housing authority jurisdictions

The concentration of users of publicly supported housing (who are disproportionately non-white themselves) exacerbates the impact of vouchers from other housing authorities. The DFW region is home to many housing authorities with overlapping jurisdictions. Figure 74 displays the boundaries of the 20 cities and housing authorities engaged in the North Texas Regional Housing Assessment. The housing authorities of Plano, McKinney, Fort Worth, Denton, Greenville, Frisco, City of Dallas and Dallas County have significant areas of overlap. A single rental property may include residents holding vouchers from several housing authorities often without the housing authorities' knowledge.

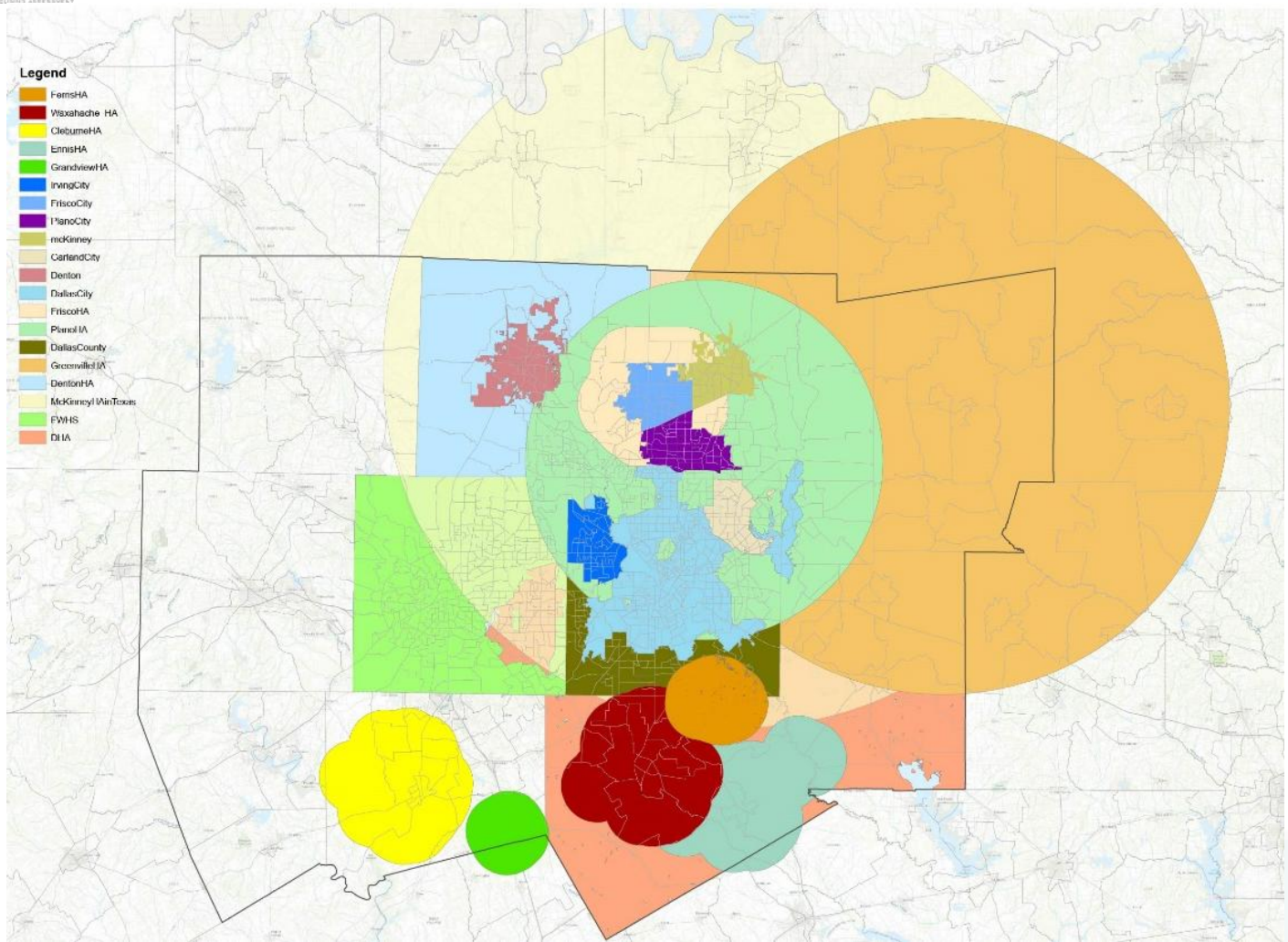


Figure 74: Jurisdictions of the housing authorities participating in the North Texas Regional Housing Assessment

Two hundred twenty-seven vouchers from the Dallas Housing Authority (DHA) are in use in the FWHS jurisdiction. DHA HCV payment standards are significantly higher than FWHS payment standards and Walker Voucher standards are higher yet. Figure 75 shows the median payment standards for FWHS, DHA in Tarrant County, and DHA Walker vouchers for zip codes in which FWHS has a payment standard. Figure 76 shows the location of DHA vouchers (brown dots) superimposed on the locations of FWHS vouchers. DHA vouchers are located in approximately 55 census tracts within the FWHS jurisdiction. DHA vouchers are generally located where FWHS vouchers are more highly concentrated and in some areas of higher segregation.

HCV Program	0 BR	1 BR	2 BR	3 BR
FWHS	\$738	\$840	\$1,055	\$1,450
DHA Tarrant County	\$810	\$922	\$1,159	\$1,597
DHA Walker	\$920	\$1,048	\$1,318	\$1,815

Figure 75: Comparison of median payment standards for FWHS, DHA in Tarrant County and DHA Walker vouchers by unit size (2017-2018)

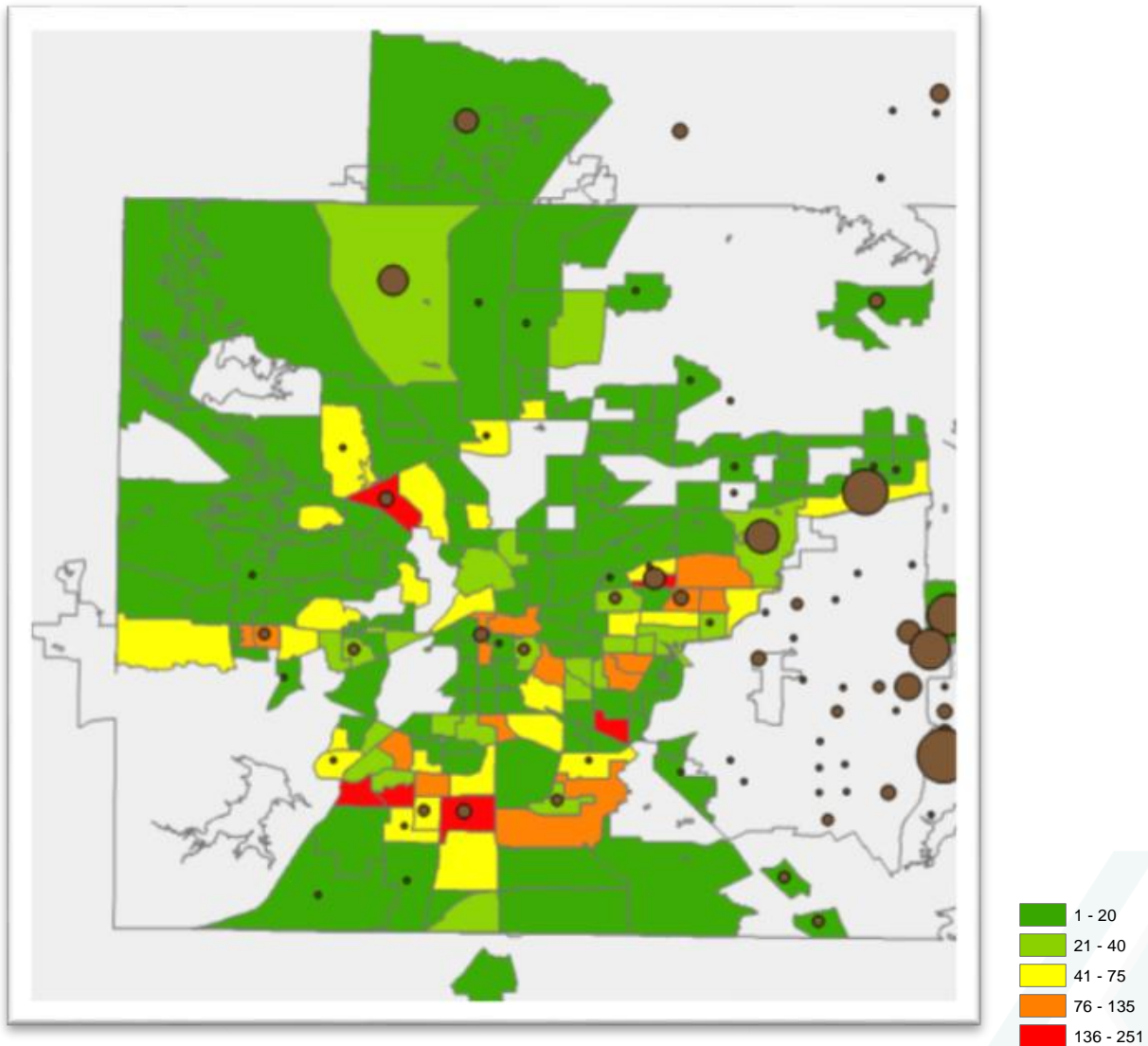


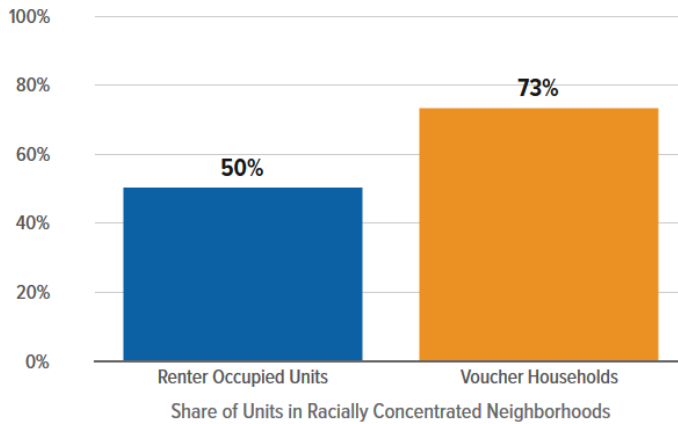
Figure 76: Location of Dallas Housing Authority Vouchers (brown dots) and FWHS vouchers

Racially or ethnically concentrated census tracts (50% or more non-white or Hispanic residents) made up 43% of the census tracts in the jurisdiction (U.S. Department of Housing and Urban Development, 2015). Figure 77 displays the percent of housing units located in racially and ethnically concentrated census tracts for all rentals and for voucher rentals in the Fort Worth-Arlington metropolitan area (Center on Budget and Policy Priorities, 2018). Fifty percent of all rental units in 2015 were located in racially and ethnically concentrated census tracts. Seventy-three percent of households using vouchers were located in racially and ethnically concentrated census tracts. The Arlington Housing Authority does not locate its voucher holders in the jurisdiction of FWHS (and vice versa), based on an inter-local agreement.

TABLE 4

Segregation of Area Housing Units

	Total Units	% in Racially Concentrated Neighborhoods
Renter-Occupied Units	286,972	50%
White, non-Hispanic Households	139,149	30%
Non-White/Hispanic Households	147,823	68%
Voucher Households	13,084	73%
White, non-Hispanic Households	2,835	49%
Non-White/Hispanic Households	10,239	80%



Notes: A neighborhood is "racially concentrated" if at least 50% of the population is non-white/Hispanic. We use Census tracts as proxies for neighborhoods. Race/ethnicity based on the household head.

Sources: 2011-2015 American Community Survey and 2016 HUD administrative data

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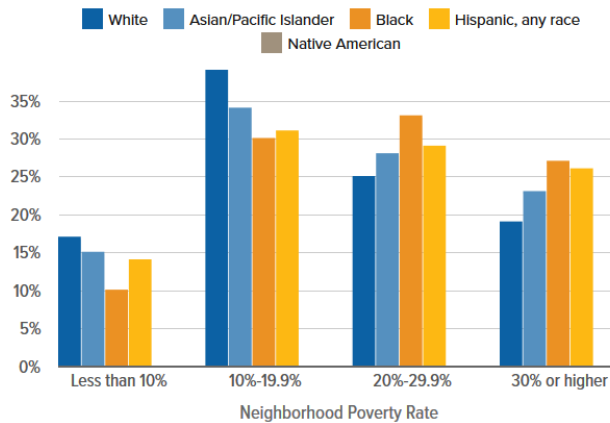
Share of Residents in the SAFMR Area That Are Non-White/Hispanic	47%
Share of Voucher Households in the SAFMR Area That Are Non-White/Hispanic	78%

Figure 77: Percent of housing units located in census tracts with 50% or more non-white/Hispanic residents

White voucher holders are less likely to live in a neighborhood where 10% or more of the families have incomes below the federal poverty level. Figure 78 displays the percent of families with vouchers by the poverty level of their neighborhood and their race or ethnicity in the Fort Worth-Arlington metropolitan area (Center on Budget and Policy Priorities, 2018). Sixty percent of black voucher-holding families compared with 44% of white voucher-holding families live in high-poverty neighborhoods (20% or more with incomes below the federal poverty level).

Distribution of Voucher Units by Race

Race/Ethnicity	Total Units	Distribution of Families by Neighborhood Poverty Rate			
		Less than 10%	10%-19.9%	20%-29.9%	30% or Higher
Asian/Pacific Islander	191	15%	34%	28%	23%
Black	8,723	10%	30%	33%	27%
Hispanic, any race	1,230	14%	31%	29%	26%
Multiracial	61	15%	31%	39%	15%
Native American	Suppressed	Suppressed	Suppressed	Suppressed	Suppressed
White	2,835	17%	39%	25%	19%



Notes: Household counts under 11 are suppressed for privacy. We use Census tracts as proxies for neighborhoods. Race/ethnicity based on the household head. Honolulu appears to have much lower poverty than all the other SAFMR areas due to differences in local cost of living. "MSA" = metropolitan statistical area.

Sources: 2011-2015 American Community Survey and 2016 HUD administrative data

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Figure 78: Percent of voucher holders by race and neighborhood poverty rate, FW/Arlington, 2015 ACS

Mobility Programs

In the Dallas-Fort Worth metropolitan region, patterns of segregation set the stage for fair housing litigation related to housing location choice in *Walker v HUD* beginning in 1985 (Daniel & Beshara, P.C., 2018). The initial lawsuit was against the City of Mesquite, a suburb of the City of Dallas, where the plaintiff was prevented from using a Section 8 voucher. The Walker decision found that "certain housing programs prevented minorities from moving into non-minority areas of Dallas" and the surrounding suburbs (Dallas Housing Authority, 2012). The court ordered, among other remedies, that programs be established to facilitate the use of rental subsidy vouchers in predominantly white, lower poverty communities (Debra Walker, et al., v. U.S. Department of Housing and Urban Development, et al., 2001). The Mobility Assistance Program, operated by Inclusive Communities Project (ICP), received funding through the Walker Settlement and serves residents participating in the Dallas Housing Authority's Housing Choice Voucher program. Families receive assistance to use vouchers to obtain housing in higher opportunity areas in seven counties, including Tarrant. To reverse patterns of segregation, Walker Settlement voucher holders must move to housing in a Walker Targeted Area defined as a census tract in which the poverty rate is less than or equal to 22.3%, the black population is less than or equal to 25.7% and where no public housing is located (Inclusive Communities Project, 2013). ICP further assists DHA voucher holders to relocate in High Opportunity Areas, defined as census tracts in which residents have incomes at or above 80% of the Area Median Income, no more than 10% of residents have incomes below the Federal poverty rate and public schools meet the standards of the Texas Education Agency and have four-year graduation rates of 85% or higher.

Mobility programs help participants in publicly supported housing to access housing opportunities in lower poverty, higher opportunity communities through search assistance and

counseling services (Inclusive Communities Project, 2018). Few housing authorities in the region have funding to support mobility programs, including FWHS.

Relocation

Housing authorities are required to provide relocation assistance to public housing residents displaced during redevelopment and reconstruction activities of the RAD program (U.S. Department of Housing and Urban Development, 2014). Assistance must include moving assistance, advice and referrals to replacement properties, and when possible, to areas without minority concentration.

The sale and demolition of Ripley Arnold was FWHS's first major relocation project. Most residents received Housing Choice Vouchers to use throughout the jurisdiction (Mitchell, 2018). FWHS built townhomes and bought an existing apartment complex in higher income, low minority southwest Fort Worth to increase the opportunities for residents to move to less segregated communities (Fox, 2002). Opposition from the receiving community to the relocation was significant and resulted in the reduction of numbers of low-income residents relocated to one property. A research team from the University of Texas at Arlington studied resident experiences as they relocated, including in-depth interviews (Johnston, 2006). Relocated residents reported challenges with transitioning to the new communities, including isolation, difficulty with finding work, accessing child care and transportation, with a great deal of variability in the amount of assistance people needed. The principal investigator for the study said, "success of the relocation varied from household to household. Some did well, others not so well. Some were evicted who might also have been evicted from Ripley Arnold. Others who were evicted might have been able to stay had they still been at Ripley" (Tarrant County College District, 2013).

The former president of the Ripley Arnold tenants association started a nonprofit organization that assisted former public housing residents after continuing to receive requests for help after the relocation (Serio, 2004). Assistance included a newsletter and help finding childcare and transportation, consistent with recommendations of researchers that residents continue to need help to connect with their new community and its resources (Lucio & Barrett, 2010). Most residents relocated to lower poverty communities.

Relocation of residents from FWHS's RAD properties will be to specific properties provided by FWHS through new construction or property acquisition scattered throughout the community, including LIHTC and rent-restricted properties (Fort Worth Housing Solutions, 2018). FWHS will continue to intentionally use the RAD relocation process to de-concentrate poverty (from the old public housing projects) and provide access to higher opportunity areas with quality housing, access to employment, higher performing schools and other community amenities. FWHS will conduct individualized assessments of need (based on a written protocol) for each household combined with meetings to present detailed information about the properties available. Residents participate in a lottery process to select their future residences. Residents receive detailed information about their community of choice, including property description, community resources, an area map and lists of area schools with contact information. Residents have 15 days to reconsider their choice. Relocation services will include counseling, advisory services and/or home visits.

Contributing Factors of Segregation

Figure 79 displays CFW survey response ratings of extremely important for contributing factors to racial and ethnic integration, sorted by protected group (City of Fort Worth, 2017). Figures in bold reflect the highest ratings of extremely important for each factor. Black residents had the highest percentage of extremely important ratings for eight of the 12 factors offered in the survey. More than 70% of black residents rated economic pressures (rising rents, housing prices and gentrification), affordable housing availability and community revitalization as extremely important to integration.

Factors affecting integration:	White	Black	Hispanic	Asian	Native Amer.	Age 65+
Land use and zoning laws	59%	68%	69%	66%	50%	70%
Housing occupancy codes and limits	54%	64%	60%	81%	54%	66%
Deteriorated and abandoned properties	53%	69%	68%	69%	31%	63%
Community Support	49%	72%	59%	74%	39%	57%
Economic Pressures	49%	72%	68%	63%	32%	52%
Community Revitalization	47%	72%	66%	63%	31%	55%
Affordable housing availability	47%	74%	58%	50%	42%	58%
Access to financial services	44%	64%	58%	64%	33%	56%
Government investment in neighborhoods	35%	66%	59%	62%	38%	49%
Source of income/Private discrimination	33%	55%	51%	63%	31%	37%
Private investment in neighborhoods	43%	60%	54%	50%	8%	52%
Regional cooperation between cities	33%	56%	52%	50%	31%	43%

Figure 79: Percent of respondents to CFW survey rating factors affecting integration extremely important by protected classes, CFW 2017

Respondents to the CFW survey gave land use and zoning laws the highest overall percentage for ratings of extremely important to integration. Figure 80 displays the proportion of land currently zoned for uses that accommodate multi-family housing in the City of Fort Worth (City of Fort Worth, 2017). Only seven percent of the land in the CFW accommodates multi-family housing. The majority of residential land uses are single-family. Research finds that land uses that allow for minimum single-family lot sizes of less than 5,500 square feet or eight or more units per acre do not exclude minority residents (Pendall, 2000). Multi-family housing and smaller single-family lots contribute to the supply of more affordable rental housing and are more accessible to minority families. The CFW Comprehensive Plan calls for an increase of 13% in land uses that accommodate multi-family housing (CFW, 2017).

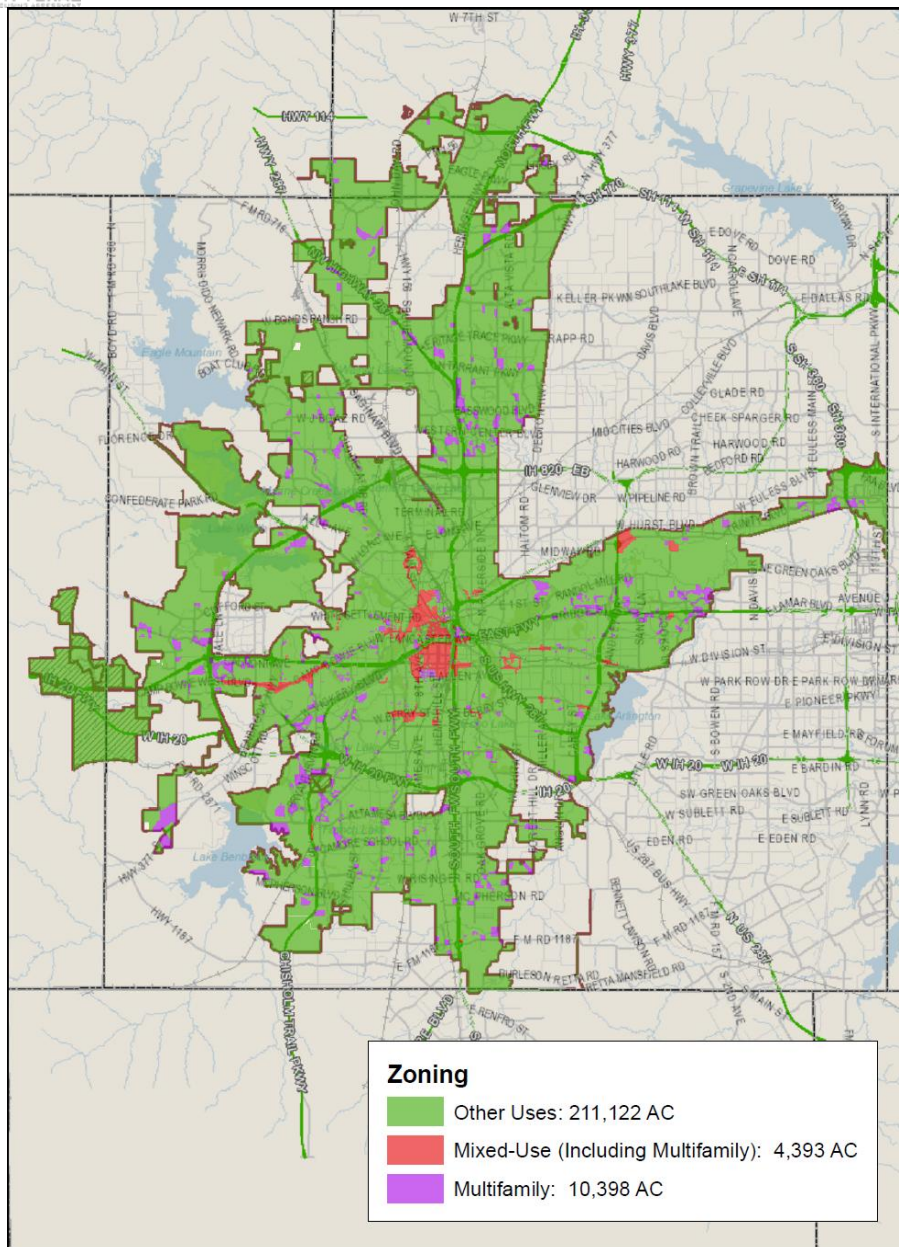


Figure 80: Current zoning types accommodating multi-family housing by number of acres, CFW 2017

Racial discrimination in Fort Worth

Participants in public meetings and focus groups most frequently cited private discrimination as a contributing factor to segregation. Many participants in both meetings and surveys stated that racism was a problem and that the Fort Worth community was highly segregated. Other participants in the CFW survey characterized their communities as well integrated. Participants in public meetings and focus groups said that real estate agents played a part in steering people of color to minority communities.

The City of Fort Worth established its Race and Culture Task Force in 2017. The precipitating event to the establishment of the Task Force was a 2016 incident in which a Fort Worth police officer was videotaped using force to restrain a mother who had called for service because her neighbor was physically threatening her son (Timm-Garcia & Simon, 2017; City of Fort Worth, 2018). The task force addressed questions around racism, race equity and race/ethnic relations. The Task Force sponsored community conversations during 2017, including open meetings of the

task force and 44 meetings to gather information, hear from the community and identify problems. Six sub-committees addressed different aspects of community life, including one addressing discrimination in housing. The task force provided an interim report to the City Council in a work session held May 1, 2018 (Tameez, 2018). One of the frequently expressed comments from those participating in the process was that the “problem is systemic, structural and institutional racism, not simply personal or individual behavior” (Navejar, Biggins, Bloom & Sanders, 2018). Community conversations identified racial segregation as one of the top 10 issues along with discrimination in economic development, public accommodations, employment and housing (Navejar, Biggins, Bloom & Sanders, 2018). The Task Force reported that minorities were more likely to live in communities with housing stock built prior to 1960 and that majority minority communities have much higher proportions of streets, streetlights and sidewalks in poor condition.

Sample AFH public engagement comments:

The following sample comments from public meetings, focus groups and the City of Fort Worth survey express public participant's concerns about race, ethnicity and segregation. (CFW survey comments are identified by number.) A complete list of all comments is available in the appendix.

- There are thoughts about your demographics and people look at the type of neighborhoods that you can go and live in [based on your demographics].
- They [white, higher income communities] do not want to accept you because of where you came from and I feel like it is unfair. I had a negative encounter [with a community] and they didn't tell the reason they didn't accept me.
- Real estate agents encourage segregation.
- We only see real estate agents bring black people to our neighborhood.
- [Builder of affordable homes in southeast Fort Worth has targeted a] specific ethnicity in every area [in which he builds]; [homes built are affordable at] \$160k price point; some areas are not as good as others are but they are filling homes [because of the price point].
- I live in a very white, very safe neighborhood. This is not the case for people of color. Fort Worth consistently shifts the burden of the poor and disadvantaged to the poorer neighborhoods where people of color live. There is a racially biased community of leaders from the top down and it is a scary place for people of color. We have economic segregation sanctioned by those in power and until they are removed, not much will change. (CFW survey 88)
- Until we learn to live together, rich, not so rich and poor; blacks, whites, browns, green and purple...we will not be a united city (CFW survey 103)
- Fort Worth has tremendous wealth segregation and racism continues perpetuated (CFW survey 120)
- The City of Fort Worth, like many cities has general racial divides based on where a person lives. Some of the community opposition come in because the communities are so split based on race or nationality that our fellow Fort Worth residents do not talk with each other. (CFW survey 191)
- Our diverse community is racially and ethnically separated (segregated) when it should be an inclusive city. (CFW survey 457)
- I live in an active, mixed-race neighborhood and have wonderful AA and Hispanic neighbors. I am unaware of barriers to home ownership in our area. (CFW survey 16)
- My neighborhood is quite ethnically diverse without “fair housing” (CFW survey 106)

- We have a variety of races and ethnicities in my neighborhood (CFW survey 158)
- My community is well diversified in ethnic groups and I purchased a home through housing dept. and have a HUD insured mortgage...this community is great! (CFW survey 376)

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

Analysis

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

HUD defines racially and ethnically concentrated areas of poverty (R/ECAP) as census tracts with 50% or more of the population classifying themselves as non-white and 40% or more of the population with incomes below the federal poverty level (adjusted for household size) (HUD, Office of Policy Development & Research, 2017). The FWHS jurisdiction contained 21 R/ECAPs in 2015 all located inside of I-820 (Figure 81). In Fort Worth, the R/ECAPs concentrate to the southeast from downtown to I-820. Other locations in Fort Worth include an area around Business US 287 near Meacham Field, Como and Las Vegas Trail in southwest Fort Worth, an area in east Fort Worth along I-30 near I-820 and an area in southwest Fort Worth near McCart and Seminary. Inside Tarrant County, but outside of Fort Worth, a R/ECAP exists in west Grand Prairie near SH 360.

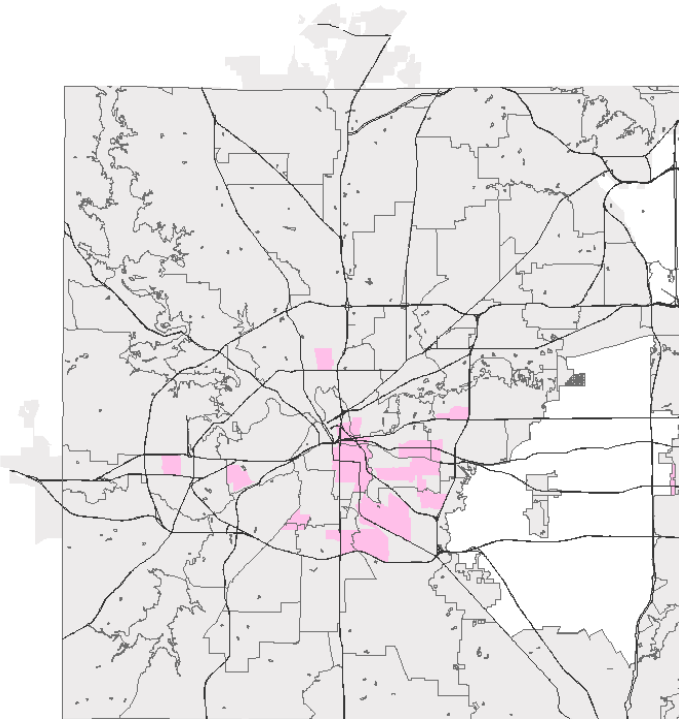


Figure 81: R/ECAPs in FWHS jurisdiction, ACS 2015

Figure 82 displays R/ECAPs in the NTRHA region. R/ECAPs are primarily located in Fort Worth and Dallas, primarily concentrated in the southeast sectors of the cities. Smaller numbers of R/ECAPs are located in the mid-cities area between Fort Worth and Dallas and in Commerce and Ennis.

In Dallas County, most of these R/ECAPs occur near Fair Park and south Dallas near I-45 and US 175. In west Dallas, R/ECAPs occur near Fish Trap Park and Rupert Park between the Trinity River and Fort Worth Avenue. One cluster appears in Oak Cliff and another appears in east Dallas north of I-30 and east of Samuell Grand Park. Many other clusters have developed near freeway interchanges: 1) I-35E and US 67 (both along SH Loop 12 and I-20), 2) US 175 and Loop 12, 3) I-35E and SH 180 and 4) Loop 12 and I-30. The final R/ECAPs within Dallas appear in isolated

locations near freeways in north Dallas; these locations include near Richardson north of I-635 and adjacent to US 75, east of US 75 between I-635 and Loop 12 and just north of I-635 and east from US 75 near Garland. Inside Dallas County, but outside of Dallas, R/ECAPs exist in Carrollton near I-35E, north Desoto and Garland.

Outside Dallas and Tarrant Counties, four other counties contain R/ECAPs. Collin County has a R/ECAP in north Dallas near SH 190. Denton County has a R/ECAP in south Denton. Ellis County has a R/ECAP in Ennis. Hunt County has a R/ECAP in Commerce.

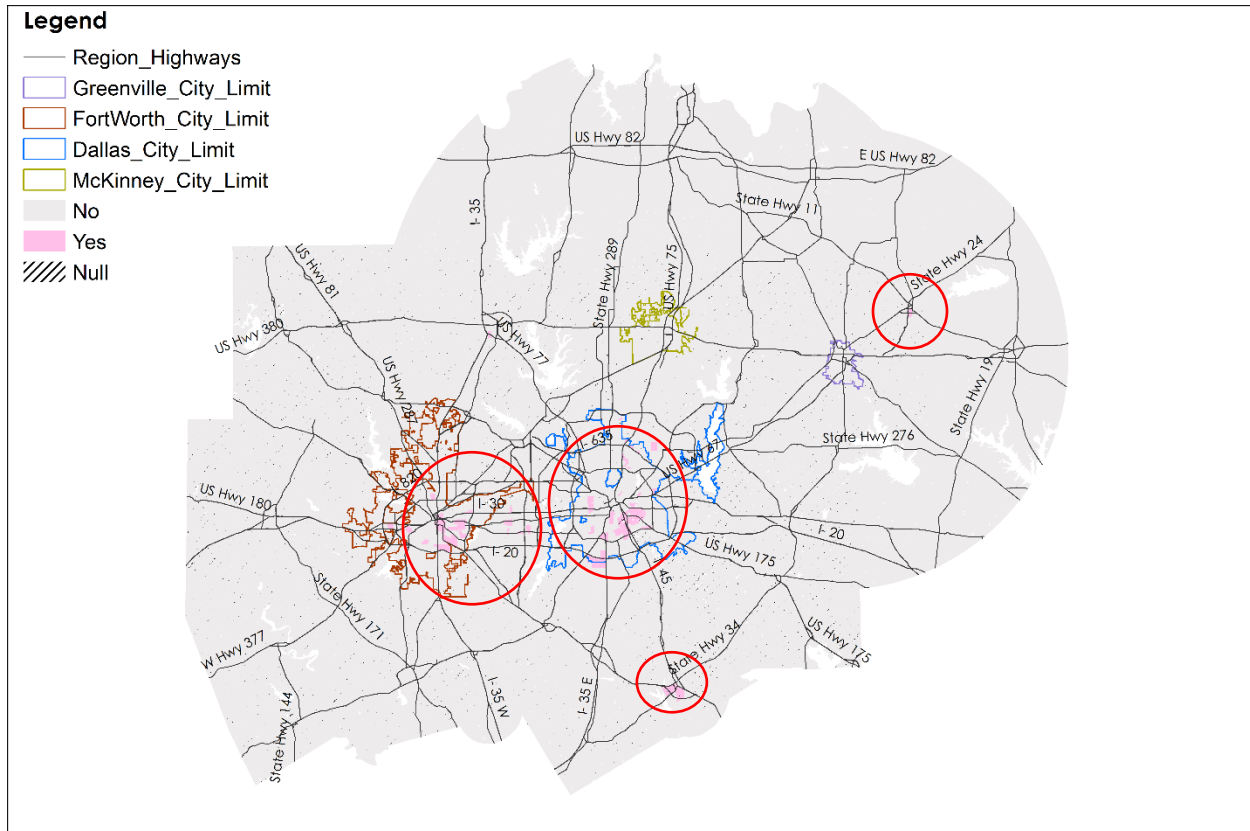


Figure 82: R/ECAPs NTRHA region, ACS 2015

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

Figure 83 shows the demographics of the R/ECAPs of the DFW region compared with the City of Fort Worth, including race, ethnicity, family type and national origin. Fort Worth is similar to the rest of the region and accounts for 30% of the total regional R/ECAP population in 2013. However, Fort Worth has a higher percentage (52%) of Hispanic residents living in R/ECAPs than the region (47%) and relatively lower percentages of white, black and Asian/PI residents in R/ECAPs. Figure 83 also shows that about 20% of the Fort Worth and regional R/ECAP residents are immigrants from Mexico.

Black residents account for 18% of the total population of Fort Worth (Figure 84) while black residents represent 35% of the Fort Worth R/ECAP population. The Hispanic population accounts for 52% of the Fort Worth R/ECAP population but only 34% of the total City population. R/ECAPs appear less likely to contain both Native American and Asian/PI residents in both Fort Worth and the region than their representation in the general population. Mexican immigrants account for almost 13% of the total Fort Worth population and more than 20% of the R/ECAP population.

Regionally and in Fort Worth, Hispanic and black residents account for over 84% of R/ECAP residents but only 41% of the region's residents are Hispanic and black. Mexican immigrants represent over 20% of R/ECAP residents but less than 10% of the regional population. About 57% of the regional R/ECAP households have children. More than 50% of regional households have children.

	(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction		(Dallas-Fort Worth-Arlington, TX) Region	
R/ECAP Race/Ethnicity	#	%	#	%
Total Population in R/ECAPs	78,277	-	261,237	-
White, Non-Hispanic	8,204	10.48%	29,968	11.47%
Black, Non-Hispanic	27,115	34.64%	96,808	37.06%
Hispanic	40,365	51.57%	123,073	47.11%
Asian or Pacific Islander, Non-Hispanic	1,502	1.92%	7,540	2.89%
Native American, Non-Hispanic	213	0.27%	697	0.27%
Other, Non-Hispanic	91	0.12%	366	0.14%
R/ECAP Family Type				
Total Families in R/ECAPs	16,479	-	54,898	-
Families with children	9,176	55.68%	31,104	56.66%
R/ECAP National Origin				
Total Population in R/ECAPs	78,277	-	261,237	-
#1 country of origin	Mexico	16,171 20.66%	Mexico	53,509 20.48%
#2 country of origin	Honduras	627 0.80%	El Salvador	2,790 1.07%
#3 country of origin	Other Eastern Africa	623 0.80%	Honduras	2,019 0.77%
#4 country of origin	Other South Central Asia	479 0.61%	Vietnam	1,428 0.55%
#5 country of origin	El Salvador	313 0.40%	India	1,339 0.51%
#6 country of origin	Nepal	170 0.22%	Other South Central Asia	888 0.34%
#7 country of origin	Other Middle Africa	168 0.21%	Guatemala	869 0.33%
#8 country of origin	Syria	160 0.20%	Other Eastern Africa	704 0.27%
#9 country of origin	Thailand	126 0.16%	Nigeria	466 0.18%
#10 country of origin	Burma	122 0.16%	Ethiopia	464 0.18%

Figure 83: Demographics of R/ECAPs in the City of Fort Worth and DFW region, HUD AFH Table 4, ACS 2013

	(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction		(Dallas-Fort Worth-Arlington, TX) Region	
Race/Ethnicity	#	%	#	%
White, Non-Hispanic	312,551	42.14%	3,248,508	50.55%
Black, Non-Hispanic	135,743	18.30%	941,599	14.65%
Hispanic	251,371	33.89%	1,758,738	27.37%
Asian or Pacific Islander, Non-Hispanic	27,339	3.69%	343,585	5.35%
Native American, Non-Hispanic	2,502	0.34%	25,032	0.39%
Two or More Races, Non-Hispanic	11,258	1.52%	99,655	1.55%
Other, Non-Hispanic	995	0.13%	9,096	0.14%
National Origin				
#1 country of origin	Mexico	86,881 12.53%	Mexico	595,184 9.79%
#2 country of origin	Vietnam	4,951 0.71%	India	71,353 1.17%
#3 country of origin	El Salvador	3,414 0.49%	Vietnam	54,487 0.90%
#4 country of origin	India	3,282 0.47%	El Salvador	47,606 0.78%
#5 country of origin	Philippines	2,450 0.35%	Korea	23,911 0.39%
#6 country of origin	Korea	2,111 0.30%	China excl. Hong Kong & Taiwan	21,735 0.36%
#7 country of origin	Honduras	1,604 0.23%	Philippines	19,858 0.33%
#8 country of origin	Laos	1,236 0.18%	Honduras	18,244 0.30%
#9 country of origin	Guatemala	1,084 0.16%	Nigeria	14,288 0.24%
#10 country of origin	Canada	1,003 0.14%	Guatemala	13,759 0.23%
Limited English Proficiency (LEP) Language				
#1 LEP Language	Spanish	89,998 12.98%	Spanish	645,031 10.61%
#2 LEP Language	Vietnamese	3,722 0.54%	Vietnamese	39,230 0.65%
#3 LEP Language	African	1,575 0.23%	Chinese	20,984 0.35%
#4 LEP Language	Korean	1,400 0.20%	Korean	14,821 0.24%
#5 LEP Language	Other Indic Language	1,156 0.17%	Other Asian Language	10,271 0.17%
#6 LEP Language	Laotian	1,144 0.16%	African	9,730 0.16%
#7 LEP Language	Arabic	689 0.10%	Other Indic Language	8,696 0.14%
#8 LEP Language	Chinese	645 0.09%	Arabic	6,765 0.11%
#9 LEP Language	Other Asian Language	554 0.08%	Urdu	4,613 0.08%
#10 LEP Language	Tagalog	456 0.07%	Hindi	4,321 0.07%
Disability Type				
Hearing difficulty		18,506 2.70%		159,591 2.65%
Vision difficulty		15,508 2.27%		115,061 1.91%
Cognitive difficulty		29,451 4.30%		226,638 3.76%
Ambulatory difficulty		39,326 5.75%		316,777 5.26%
Self-care difficulty		14,259 2.08%		122,242 2.03%
Independent living difficulty		23,930 3.50%		204,582 3.40%
Sex				
Male		364,209 49.10%		3,168,434 49.30%
Female		377,549 50.90%		3,257,780 50.70%
Age				
Under 18		216,725 29.22%		1,785,825 27.79%
18-64		463,473 62.48%		4,068,790 63.32%
65+		61,560 8.30%		571,599 8.89%
Family Type				
Families with children		95,402 53.77%		822,439 51.21%

Figure 84: Demographics of Fort Worth and the DFW region, (HUD AFH Table 1, ACS 2013)

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

The FWHS jurisdiction experienced fluctuations in R/ECAP locations from 1990 to 2015. In 1990 (Figure 85), all of the R/ECAPs occur either near downtown or in southeast Fort Worth between downtown and I-820. In 2000 (Figure 86), the initial R/ECAP locations expanded to include more of southeast Fort Worth. Also in 2000, a R/ECAP first appears in the Como area in west Fort Worth. The Como area does not appear as a R/ECAP in 2010, but the designation reappears in 2013 and 2015. In 2010 (Figure 87), a R/ECAP developed south of the Naval Air Station that disappeared in 2013 (Figure 88). Since 2010, an area in north Fort Worth, north of SH 183 and south of I-820 between I-35W and US 287 has fluctuated in size, shape and location, shrinking by 2015. Since 2010, a R/ECAP has existed in an area in southwest Fort Worth near McCart and Seminary. In 2013, R/ECAPs emerged in Lake Worth and along I-30 near I-820, disappearing in

2015. In 2013, FWHS jurisdiction R/ECAPs expanded to include west Grand Prairie near SH 360. By 2015 (Figure 89), R/ECAPs expanded to cover over half of southeast Fort Worth.

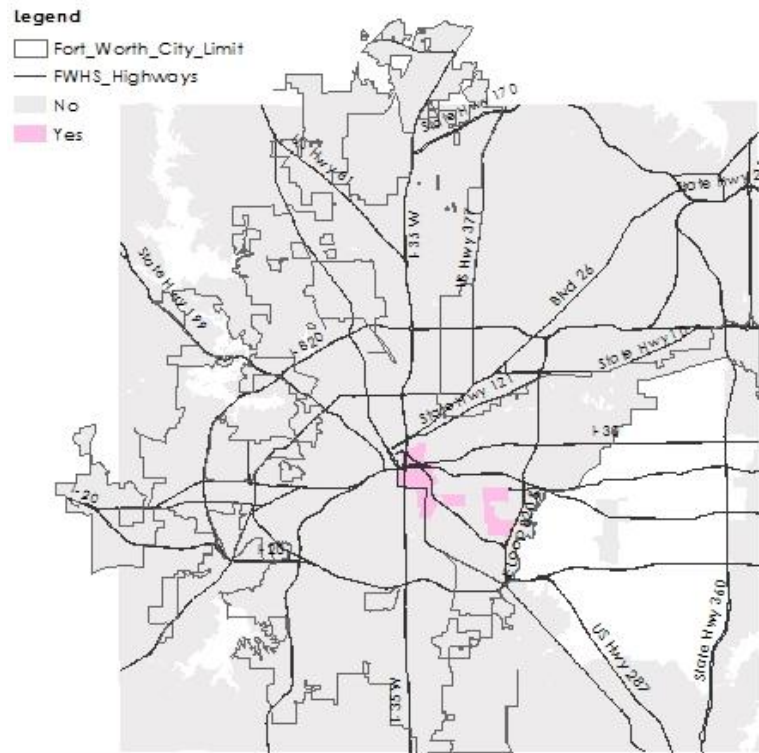


Figure 85: R/ECAPs Map of FWHS jurisdiction, ACS 1990

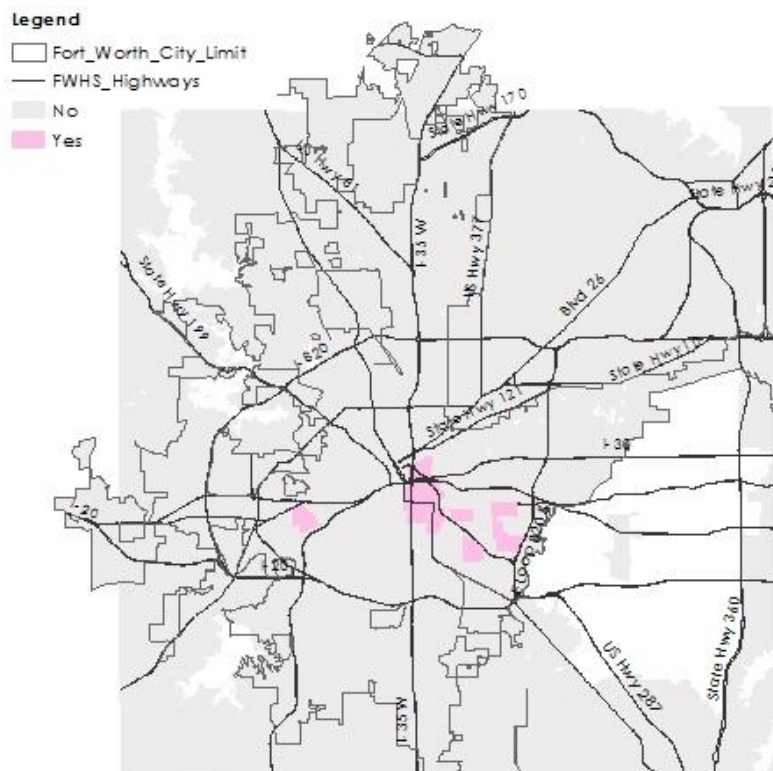


Figure 86: R/ECAPs Map of FWHS jurisdiction, ACS 2000

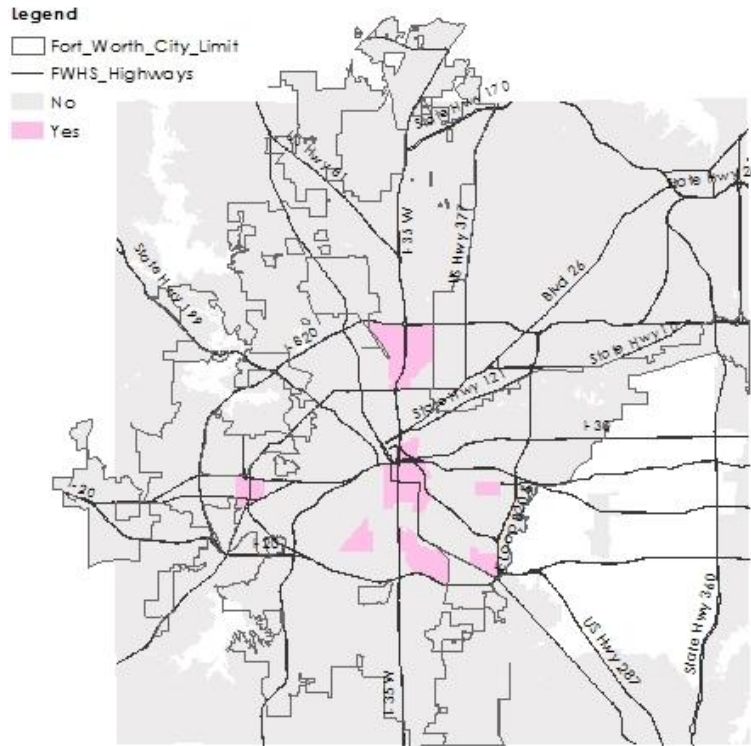


Figure 87: R/ECAPs Map of FWHS jurisdiction, ACS 2010

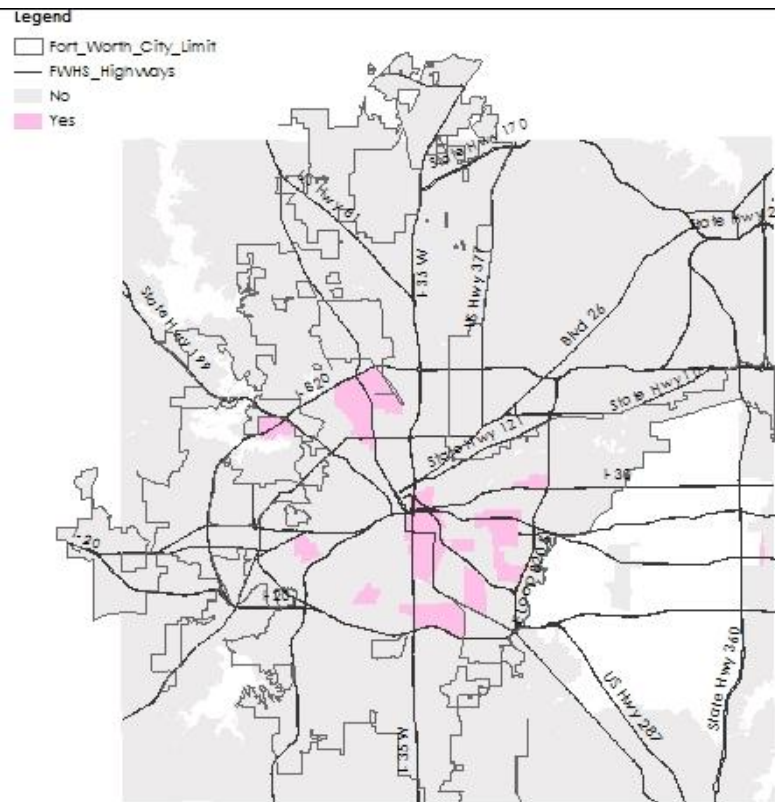


Figure 88: R/ECAPs Map of FWHS jurisdiction, ACS 2013

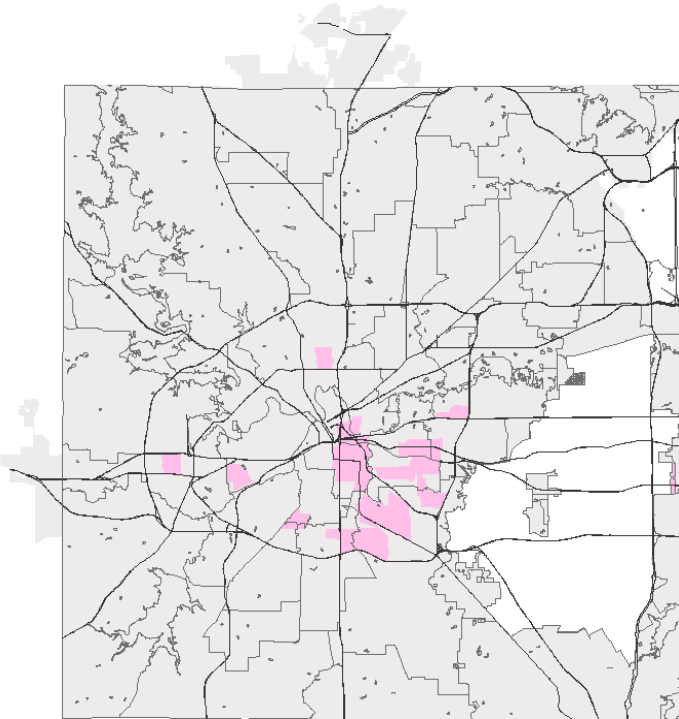


Figure 89: R/ECAPs in FWHS jurisdiction, ACS 2015

Conditions changed significantly between 2015 and 2016 in the FWHS. Figure 90 shows the number of census tracts that meet the criteria for R/ECAP in 2016. The number of R/ECAPS drop from 21 in 2015 to 13 in 2016. R/ECAPS were measured in six periods, including 1990, 2000, 2010, 2013, 2015 and 2016. Figure 90 also shows the number of periods in which each 2016 R/ECAP met the criteria for R/ECAP. Four census tracts were R/ECAPs from 1990 through 2016, all in southeast Fort Worth.

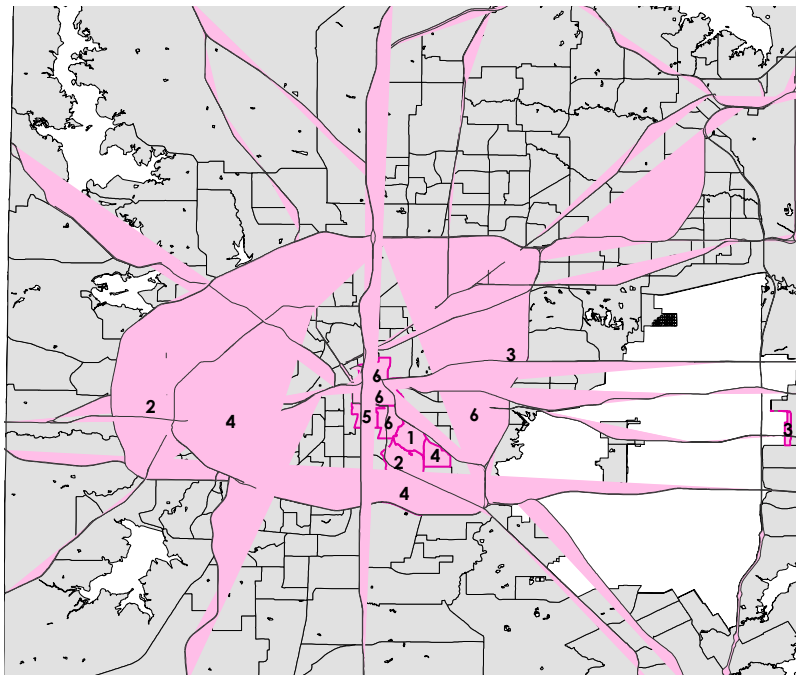


Figure 90: R/ECAPs in FWHS with number of periods R/ECAP (ACS 2016)

The number of census tracts meeting the criteria for R/ECAP grew in number across the NTRHA region from 1990 (26 census tracts) to 2015 (64 census tracts). Figure 91 shows the growth in R/ECAPs in NTRHA cities. Other cities, including McKinney and Plano, have no R/ECAPs.⁹ R/ECAPs in the region dropped significantly in 2016 to 55, led primarily by a substantial reduction in R/ECAPs in Fort Worth from 21 in 2015 to 13 in 2016 (ACS 2016). Reductions in the number of census tracts meeting the criteria for R/ECAP coincided with small reductions in the percent of residents with incomes below the federal poverty rate.

Jurisdiction	# of R/ECAPs			
	1990	2000	2010	2015
Region	26	30	51	64
Dallas	18	18	32	32
Fort Worth	6	9	13	21
Garland	0	0	0	1
Denton	0	1	1	1
Greenville	1	0	1	0
Ennis	0	0	0	1
Waxahachie	1	0	0	0

Figure 91: Number of R/ECAPs in NTRHA region 1990-2015 by city and region (US Census, ACS)

R/ECAP areas primarily appear in Dallas and Tarrant County (Figure 92 - Figure 100). Many R/ECAPs persisted in Dallas County near Fair Park and south Dallas near I-45 and US 175. The exact census tracts designated as R/ECAPs during this period may fluctuate but poverty and segregation remains continuously present. In Dallas, an isolated R/ECAP has existed for twenty-five years near Fish Trap Park and Rupert Park between the Trinity River and Fort Worth Avenue in west Dallas. In suburban Tarrant County, one R/ECAP has existed in Arlington near I-30 since 1990.

In 1990, R/ECAPs also occur just north of I-30 in Greenville. The Hunt County seat experiences fluctuations in the designation of its census tracts as R/ECAPs over the 25-year study period. In 2000, R/ECAPs disappear in Greenville (Figure 94), but in 2010, they reappear (Figure 96). In 2015, the Greenville R/ECAP disappears again, but R/ECAPs persist in Hunt County by appearing in Commerce.

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

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

⁹ The sum of R/ECAPs in cities does not equal region totals. Additional R/ECAPs appear in counties across the NTRHA region outside of major NTRHA cities.

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

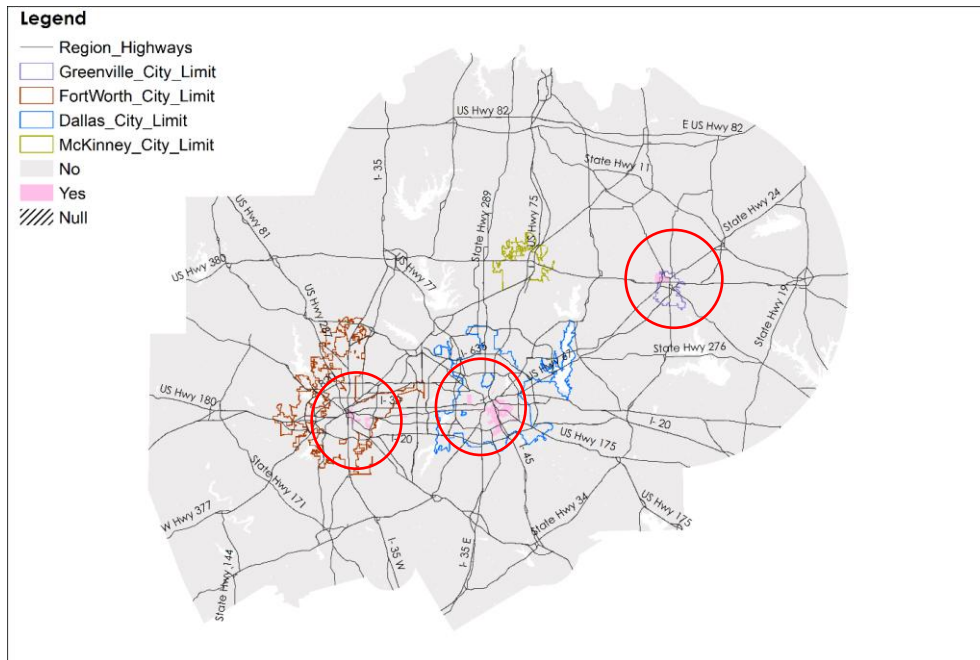


Figure 92: R/ECAPs Map of NTRHA Region in 1990, US Decennial Census 1990

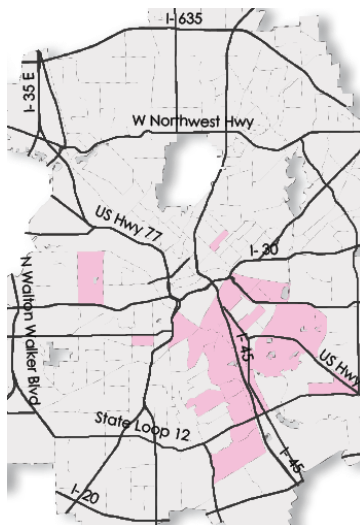
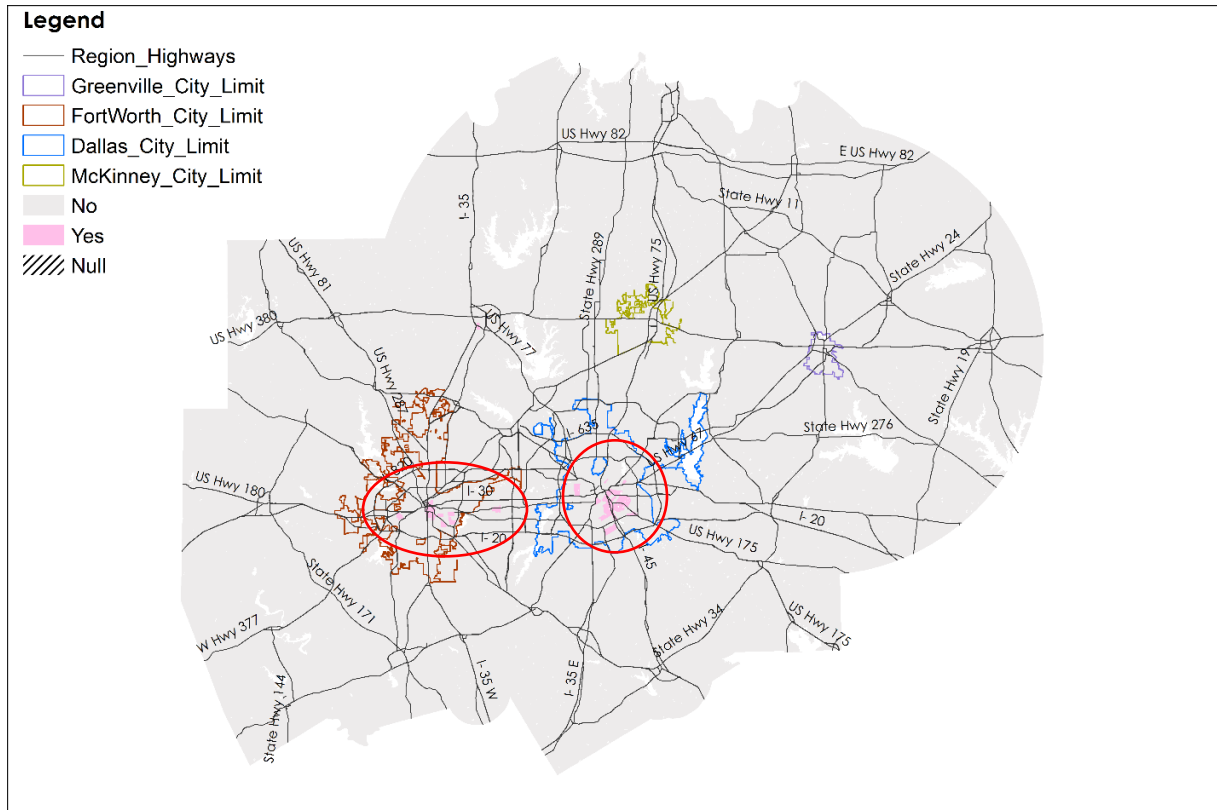


Figure 93: Dallas R/ECAPs, 1990



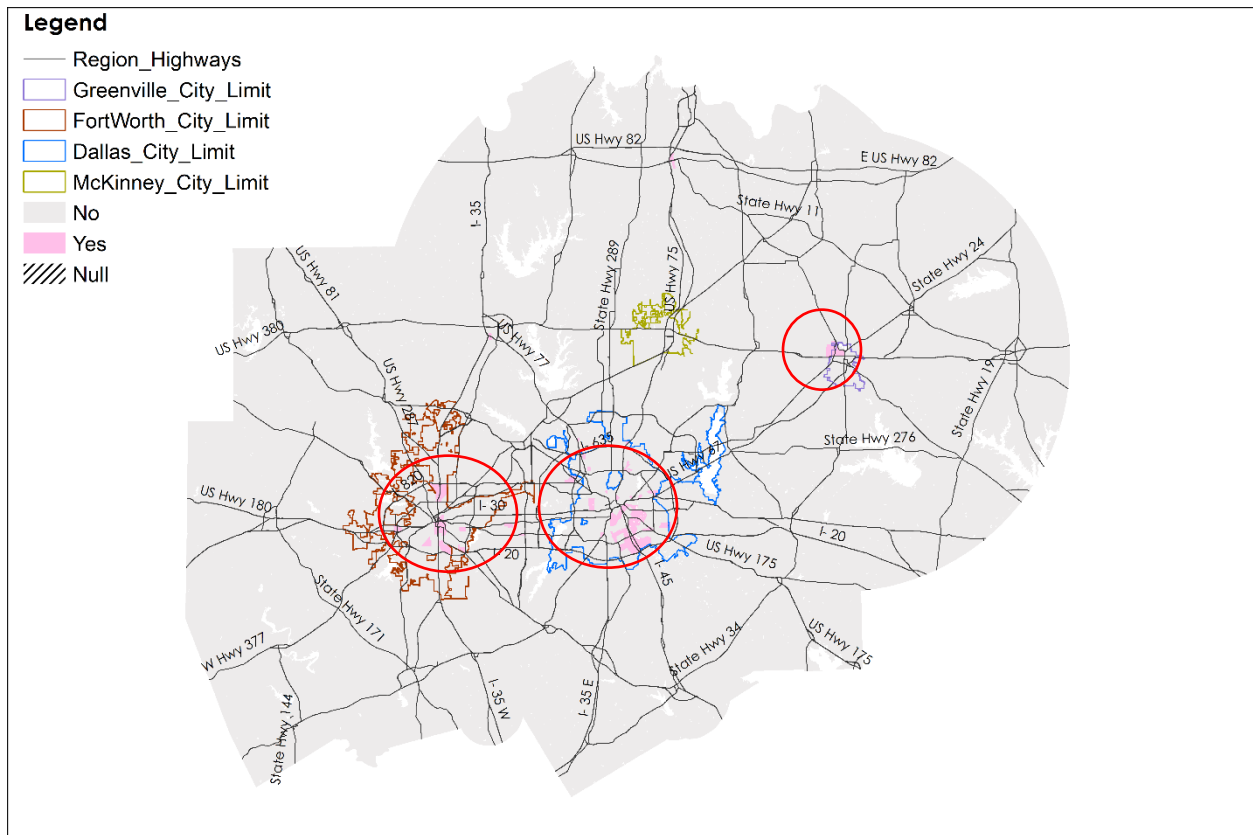


Figure 96: R/ECAPs Map of NTRHA Region in 2010 (HUD, 2010 Decennial Census)

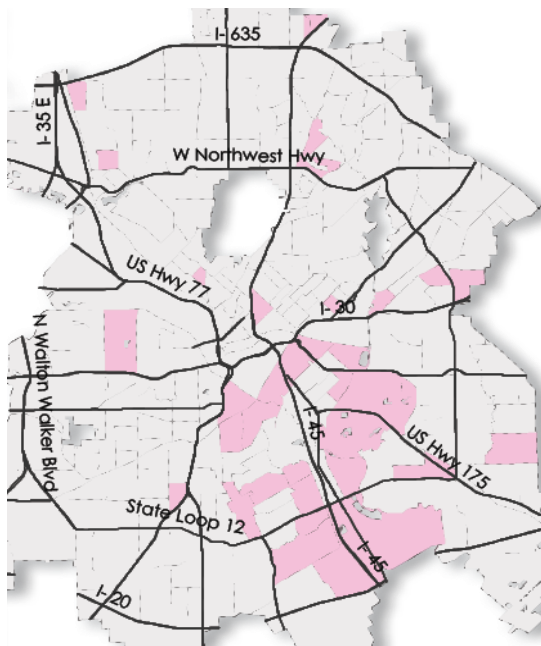


Figure 97: Dallas R/ECAPs, 2010

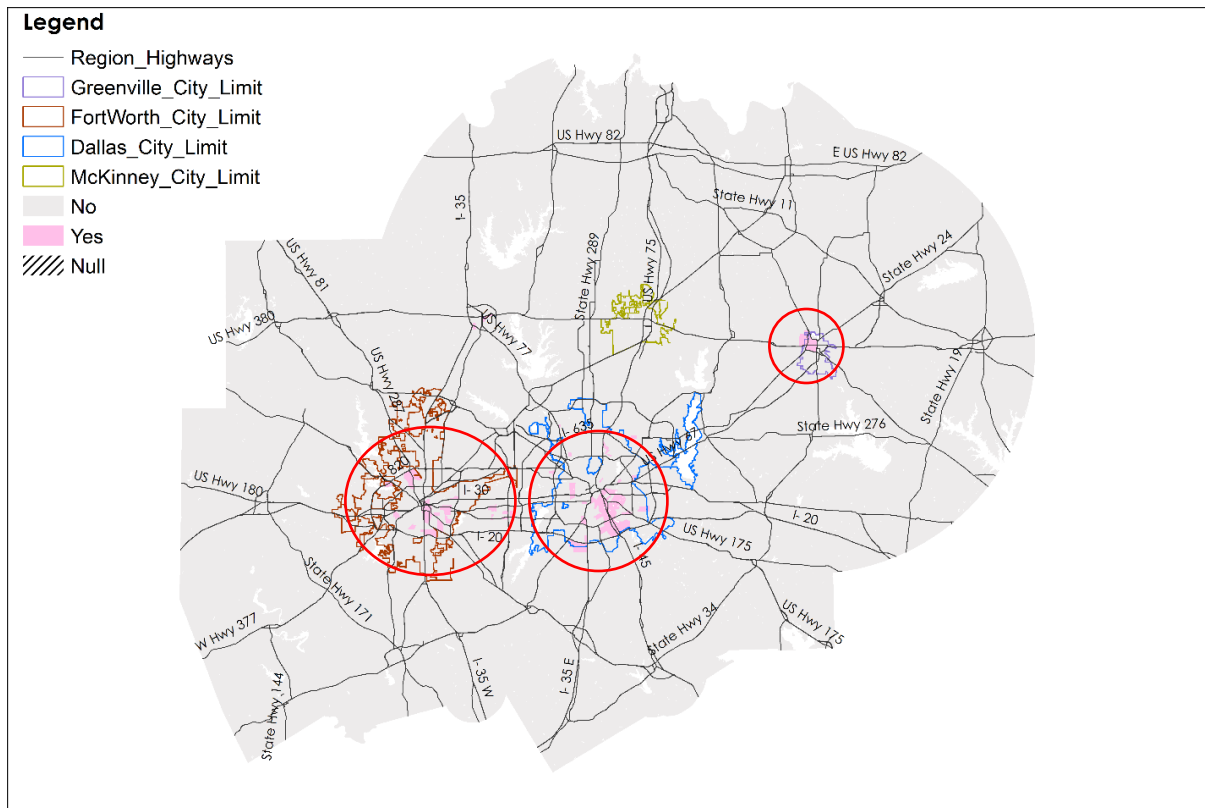


Figure 98: R/ECAPs Map of DFW Region in 2013 (HUD, ACS 2013)

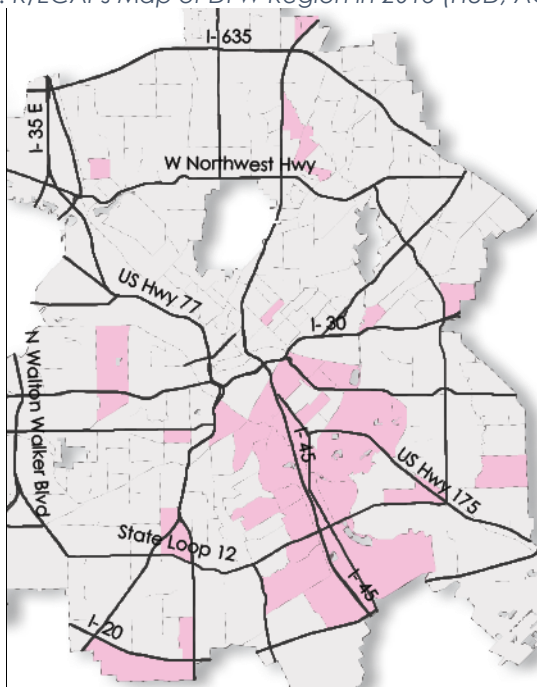


Figure 99: Dallas R/ECAPs, 2013

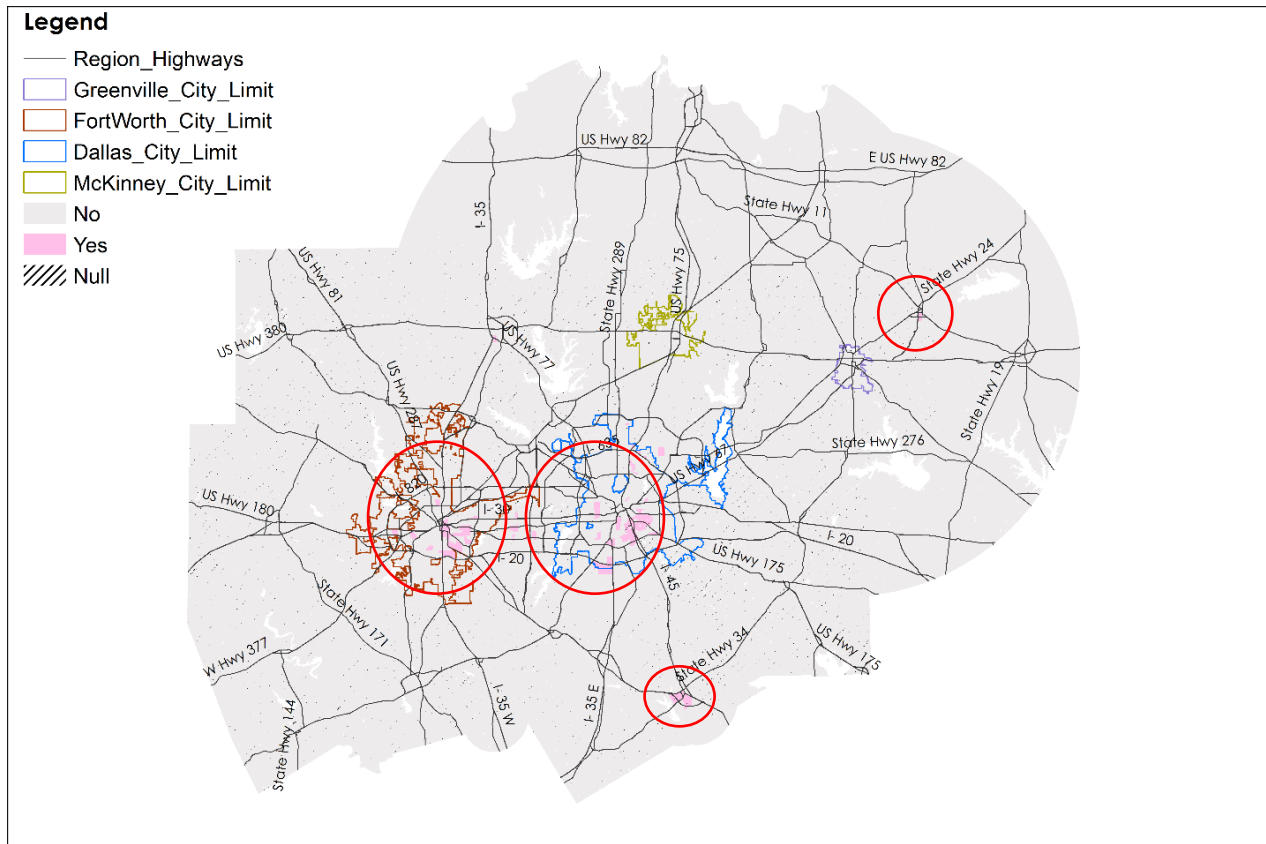


Figure 100: R/ECAPs Map of NTRHA region in (ACS, 2015)

2. Additional Information

a

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

Four census tracts remained R/ECAPs in Fort Worth from 1990 through 2015, outlined in blue in Figure 101 showing R/ECAPs in 2015. Three of them are located around the historic black communities in east and southeast Fort Worth, including Terrell Heights and Butler Place. The fourth is located in the Stop Six community near Cavile Place public housing.

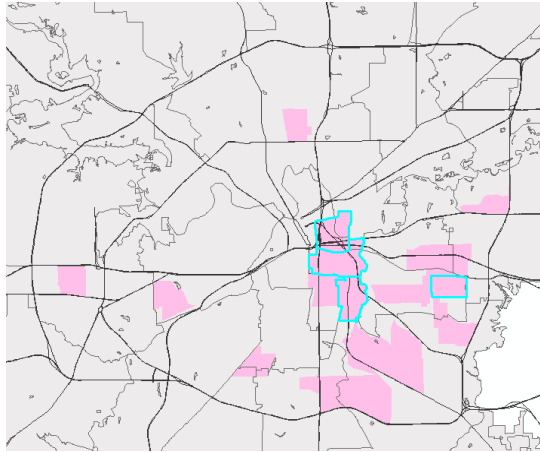


Figure 101: 2015 FWHS jurisdiction R/ECAPs, including four persistent R/ECAPs 1990 through 2015 (outlined in blue) (ACS 2015, U.S. Decennial Census 1990 - 2010)

R/ECAPs increased in number from six in 1990 to 21 in 2015, with the greatest increase from 2010 to 2013. Figure 102 presents a picture of what has happened to the 31 Fort Worth census tracts that met the criteria for a R/ECAP at least once from 1990 to 2015. Listed first are the four census tracts that have been R/ECAPs continuously since 1990. These census tracts average 64% poverty, 90% minority, 55% black and 15% persons with ambulatory disabilities (ACS 2015). Census tracts that were no longer R/ECAPs in 2015 average only 31% poverty, 80% minority and 8% persons with ambulatory disabilities. Only one census tract has a disproportionate share of Asian/PI residents, Southland Terrace (1059.02) with 29% Asian/PI residents. Housing Choice Voucher (HCV) holders are disproportionately concentrated in all but seven of the 31 census tracts with a history of R/ECAP designation. Nine of 31 have 10% or more of households supported by HCVs.

All of the census tracts that have been R/ECAPS since 1990 are located in southeast Fort Worth. Four census tracts became R/ECAPs for the first time in 2015, including the Las Vegas Trail (LVT) neighborhood (census tract 1052.01) in west Fort Worth. LVT's challenges are the unintended consequences of a concentration of 32 apartment complexes built in the 1970s resulting in a pattern of disinvestment, increased crime and concentrated poverty (Barr, 2017).

Census tract 1017.00 includes both Butler Place and the Near East Side (NES) neighborhood where a service dependent ghetto formed following the relocation, development and concentration of programs for people who are homeless (Dear & Wolch, 1987). Urban renewal programs of the 1960s spurred the demolition of the downtown area formerly known as "Hell's Half Acre", original home of the Union Gospel Mission and other services used by transient, outcast and low-income people, to make way for a convention center and other higher end uses (Jett, 2015). The Near East Side (NES) now includes three large homeless shelters providing

food, shelter, health-care, laundry and hygiene and recreation services for people who are homeless. Seventy-one percent of Tarrant County's homeless people were located in this census tract (Tarrant County Homeless Coalition, 2015). Community opposition has stymied new permanent housing projects to support people who are homeless outside of the NES, with the exception of projects not requiring formal community approval (Taffet, 2010).

Over 60% of adults in the Stop Six neighborhood profile area, the location of Cavile Place public housing, do not have a high school diploma (Neighborhood Services, 2016). The area qualifies as a USDA food desert and significantly exceeds the overall City rate for violent crime. Stop Six also has a high rate of unemployment (8.6%) (ACS, 2014). The City identified Stop Six for its pilot neighborhood improvement initiative for these reasons as well as the momentum provided by ongoing redevelopment and revitalization initiatives with FWISD, FWHS and Blue Zones (healthy food).

Census Tract	Sector	R/ECAP					2015 ACS							
		1990	2000	2010	2013	2015	% Poverty	% Non-white	% Black	% Asian/PI	% Hispanic	HCV % of Renters	% Ambulatory Disability	Total Households
1231.00 (Near Southeast)	SE	1	1	1	1	1	51%	89%	43%	0%	37%	23%	17%	830
1036.01 (Stop Six)	SE	1	1	1	1	1	66%	97%	63%	0%	15%	5%	10%	890
1038.00 (Cobb Park)	SE	1	1	1	1	1	60%	97%	66%	5%	14%	4%	13%	1,035
1017.00 (Butler/NES)	SE	1	1	1	1	1	80%	77%	48%	1%	9%	0%	20%	625
1235.00 (Hillside/Morningside)	SE	0	1	1	1	1	44%	97%	43%	1%	25%	4%	11%	770
1059.02 (Southland Terrace)	SE	0	0	1	1	1	45%	81%	27%	29%	14%	5%	8%	1,305
1048.04 (Rosemont)	South	0	0	1	1	1	44%	74%	1%	1%	53%	0%	5%	920
1062.02 (S. Edgewood)	SE	1	1	0	1	1	40%	97%	74%	0%	15%	10%	12%	1,385
1037.01 (Polytechnic)	SE	1	1	0	1	1	42%	94%	22%	0%	61%	3%	7%	1,060
1025.00 (Como)	SW	0	1	0	1	1	53%	96%	64%	0%	16%	6%	13%	1,270
1046.02 (Glencrest/Renaissance)	SE	0	1	0	1	1	51%	95%	28%	0%	40%	4%	5%	1,285
1059.01 (South/La Gran Plaza)	South	0	0	0	1	1	42%	93%	13%	0%	53%	21%	6%	990
1065.16	Far East	0	0	0	1	1	41%	90%	46%	0%	24%	10%	13%	2,165
1014.03	SE	0	0	0	1	1	41%	83%	33%	0%	27%	6%	12%	1,410
1046.03	SE	0	0	0	1	1	42%	91%	22%	0%	46%	5%	6%	1,000
1014.02	SE	0	0	0	1	1	42%	89%	13%	0%	50%	3%	7%	1,135
1219.03	Far SE	0	0	0	1	1	45%	92%	19%	4%	56%	0%	3%	1,760
1046.05	SE	0	0	0	0	1	41%	95%	55%	0%	32%	16%	14%	1,450
1002.01	North	0	0	0	0	1	44%	98%	4%	0%	72%	10%	3%	1,225
1052.01 (Las Vegas Tr.)	West	0	0	0	0	1	48%	69%	25%	1%	29%	8%	11%	1,975
1037.02	SE	0	0	0	0	1	43%	97%	41%	0%	39%	5%	9%	875
1003.00	NW	0	0	0	1	0	33%	95%	10%	0%	71%	11%	6%	1,290
1066 (Cahoba)	NW	0	0	0	1	0	37%	44%	4%	1%	36%	6%	8%	1,030
1045.05	SE	0	0	0	1	0	35%	94%	57%	0%	20%	3%	8%	1,280
1050.01	NW	0	0	0	1	0	39%	92%	1%	0%	69%	0%	6%	1,475
1236 (Southside)	Near SW	0	0	1	0	0	38%	79%	19%	2%	41%	21%	12%	785
1061.02	SE	0	0	1	0	0	26%	76%	39%	0%	23%	17%	8%	1,565
1023.01 (Altamere)	West	0	0	1	0	0	21%	61%	12%	1%	33%	9%	9%	1,130
1048.03	S. Central	0	0	1	0	0	39%	89%	2%	4%	70%	1%	4%	1,665
1045.04	SE	0	0	1	0	0	29%	91%	10%	0%	64%	1%	13%	1,030
1050.06	North	0	0	1	0	0	10%	79%	18%	0%	33%	0%	9%	200
FHWS Jurisdiction Average							16%	48%	14%	4%	21%	2%	7%	36,810

Figure 102: R/ECAP trends 1990 through 2015 (U.S. Decennial Census 1990-2010, ACS 2015)

2015 to 2016

The number of R/ECAPs in 2016 (pictured in Figure 103) decreased from 2015 (21 R/ECAPs) to 2013 levels (13 R/ECAPs). Figure 104 shows changes in poverty and percent non-white in 2015 and 2016 R/ECAPs. Nine census tracts dropped below the R/ECAP criterion for poverty (40% below the federal poverty rate). These census tracts declined from an average of 42% poverty to 38% poverty. The percent non-white in these census tracts remained the same from 2015 to 2016 at 91%. R/ECAPs remaining so from 2015 to 2016 also declined slightly in poverty from 51% in 2015 to 49% in 2016. One census tract (1045.04) in southeast Fort Worth increased its percent of residents below the poverty rate from 2015 (39%) to 2016 (45%) and became a R/ECAP for the first time. The percent non-white in this tract also increased from 97% to nearly 100%. R/ECAPs continue to be concentrated in southeast Fort Worth with R/ECAPs in west Fort Worth continuing in the Como and Las Vegas Trail communities.



Figure 103: FWHS jurisdiction R/ECAPs (ACS 2016)

Census Tract	Sector	2015 R/ECAP	2016 R/ECAP	2015 % Poverty	2016 % Poverty	2015 % Non- white	2016 % Non- white
1046.04	SE	0	1	39%	44.8%	97%	99.5%
1046.05	SE	1	1	41%	42.5%	95%	95.4%
1065.16	Far East	1	1	41%	41.7%	90%	90.4%
1219.03	Far SE	1	1	45%	45.3%	92%	93.1%
1017.00 (Butler/NES)	SE	1	1	80%	78.7%	77%	77.9%
1025.00 (Como)	SW	1	1	53%	45.3%	96%	93.5%
1036.01 (Stop Six)	SE	1	1	66%	64.6%	97%	97.1%
1038.00 (Cobb Park)	SE	1	1	60%	55.5%	97%	92.5%
1046.02 (Glencrest/Renaissance)	SE	1	1	51%	43.9%	95%	93.6%
1052.01 (Las Vegas Tr.)	West	1	1	48%	41.6%	69%	67.9%
1059.02 (Southland Terrace)	SE	1	1	45%	42.3%	81%	80.8%
1231.00 (Near Southeast)	SE	1	1	51%	49.9%	89%	90.2%
1235.00 (Hillside/Morningside)	SE	1	1	44%	44.9%	97%	96.9%
1002.01	North	1	0	44%	36.6%	98%	97.3%
1014.02	SE	1	0	42%	37.0%	89%	91.9%
1014.03	SE	1	0	41%	36.1%	83%	85.8%
1037.02	SE	1	0	43%	38.6%	97%	96.2%
1046.03	SE	1	0	42%	35.3%	91%	92.2%
1037.01 (Polytechnic)	SE	1	0	42%	39.4%	94%	93.9%
1048.04 (Rosemont)	South	1	0	44%	39.7%	74%	75.3%
1059.01 (South/La Gran Plaza)	South	1	0	42%	37.8%	93%	93.0%
1062.02 (S. Edgewood)	SE	1	0	40%	37.9%	97%	90.0%

Figure 104: 2015 and 2016 R/ECAPS with percent below poverty and non-white

b

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

Place-based investments

FWHS, the City of Fort Worth and private investors have initiated place-based investments in areas that are R/ECAPs, including the following projects:

Las Vegas Trail Revitalization Project (Census tract 1052.01, west Fort Worth)

- LVT has been the focus of recent City of Fort Worth initiatives to address deteriorated property, crime and lack of services, including a new community center and mobile social services (CBS Local Media, 2016; United Way of Tarrant County, 2018).
- The City is taking legal action against owners of properties with high crime and deferred maintenance (Caplan, 2018).

- FWHS leads the sub-committee on housing for the LVT initiative with a goal to increase the quality of affordable housing. The sub-committee is addressing property management and maintenance at apartment complexes with and without subsidized units.

Butler Place (Census tract 1017.00, east of downtown)

- Butler Place received approval for the federal RAD program which transfers ownership of the property to the housing authority to allow for sale and/or redevelopment.
- FWHS, with the City of Fort Worth, FWISD and Downtown Fort Worth, Inc. hired the Urban Land Institute to conduct a workshop in 2015 to assess market potential, identify development strategies and create design and implementation plans for redevelopment (Fort Worth Housing Solutions, 2018).
- Place-based investments recommended include:
 - Improving connections among Butler Place, downtown and Trinity River park;
 - Mixed-income housing of 2,000 units with 10 percent affordable to 30% of area median income (AMI) and another 10% affordable up to 80% AMI;
 - Historic preservation;
 - Leveraging new FWISD STEM campus;
 - Creating opportunities for current residents to remain in the redeveloped neighborhood;
 - Extend improvements to the nearby low-income East Lancaster neighborhoods (Urban Land Institute, 2015).

Columbia Renaissance (census tract 1046.02, southeast Fort Worth)

- The developer completed Phase I of the Columbia Renaissance apartment project in February 2018, a \$17m mixed-income community, including 140 LIHTC units and 35 PBV units in provided by FWHS (Fort Worth Business Press, 2018). FWHS contributes will contribute additional vouchers to Phase II of the project. This 'purpose-built' community development initiative began with the development of Columbia Renaissance Square consisting of 67 acres and more than half a million square feet of retail development. The master plan includes development of facilities for education, health-care and recreation.

Cavile Place (census tract 1036.01, southeast Fort Worth)

- FWHS is seeking approval under Section 18 to demolish the aging Cavile Place public housing project. FWHS and the City of Fort Worth created a transformation plan to redevelop the project as well as the surrounding neighborhood (Gilmore Kean, 2013). Place-based improvements may include street improvements (underway), space for new grocery and retail development, community gardens, affordable and market-rate residential and mixed-use development.
- The City of Fort Worth neighborhood improvement initiative has resulted in the removal of 180 tons of trash hidden by brush and debris in this Stop Six neighborhood (City of Fort Worth, 2018). The CFW demolished 20 sub-standard structures and boarded up others. Sidewalk construction, parks improvement and security camera surveillance are underway.

Near East Side (census tract 1017.00)

- The Near East Side Neighborhood Association (NESNA) was established in 2001 to address trash, street feeding, camping, public urination and crime in what most citizens refer to as the "homeless district" (Near East Side Neighborhood Association 2015).
- Most of the rehabilitation and new construction in this neighborhood has been in support of better quality services for homeless people, including a new day shelter at

- True Worth Place and the renovated and expanded Union Gospel Mission (Hirst, 2017).
- o The CFW supported implementation of a Texas Department of Transportation grant to redevelop sidewalks, curbs and gutters and streetlights in the NES. Private developers renovated historic buildings for market-rate loft apartments, commercial offices and government services while the NESNA developed strategies to manage problems associated with concentrated homelessness (Lancaster Lofts, 2018).

Investment flows

Theodos, et al. developed an investment score to measure inflows of capital into a census tract, including commercial, multifamily, single-family and small business lending from 2011 through 2015 (2018). The researchers ranked census tracts in relation to relative levels of investment compared to other census tracts within each state resulting in a score ranging from a high of 10 for census tracts with the most capital investment to a low of one. Census tracts in Fort Worth that have qualified as R/ECAPs during any of the above five periods have an average investment score of 6.5. R/ECAP census tracts on the west side of Fort Worth have a slightly higher average score (6.75) than those on the east side (6.32). Census tracts that have been R/ECAPs during all of the above five periods have the lowest average investment score (4.5). Census tracts that have been R/ECAPs with 80% or more non-white residents have a slightly lower investment score (6.3) than those with less than 80% non-white residents (6.9). Census tracts with a history of being R/ECAPs that were no longer R/ECAPs in 2015 have a slightly higher average investment score (6.9) than those that were R/ECAPs in 2015 (6.3) and those that were R/ECAPs for the first time in 2015 (5.5) indicating a possible relationship between increased investment and decreasing poverty and segregation.

The governor of Texas has designated seven census tracts in Tarrant County as Opportunity Zones for the purpose of receiving investment benefits created by the federal Tax Cuts and Jobs Act of 2017 (State of Texas, 2018). Investments in these census tracts will be eligible for deferred capital gains tax for a broad range of investments, including affordable housing, infrastructure, commercial and industrial real estate and businesses (Theodos, Hedman, Meixell, & Hangen, 2018). Qualifying census tracts must have at least 20% of residents with incomes below the federal poverty rate or have median family incomes at or below 80% of area median income (criteria for New Markets Tax Credit) or be contiguous to a census tract that meets these criteria (US Bank, 2018). Six of the seven census tracts are in Fort Worth and are described in Figure 105 along with their investment score (Theodos, et al., 2018). Three of the six Fort Worth census tracts designated are R/ECAPs and two more are immediately adjacent to R/ECAPS. The sixth census tract was a R/ECAP in 2013 only.

Census tracts 1235.00 and 1003.00 receive scores of 10 and 9 respectively (Figure 105) prior to any effect of the Opportunity Zone designation. These two census tracts, although meeting criteria for low-income or R/ECAP, already have high levels of commercial, multifamily, single-family and/or small business lending compared with other census tracts in Texas (Theodos, Hedman, Meixell, & Hangen, 2018). The remaining four census tracts with below average investment flow may benefit from the Opportunity Zone designation.

Census Tract	Capital Index	Location
1235.00	10	Southeast FW, Hillside/Morningside, R/ECAP 2015
1003.00	9	Northwest Fort Worth, R/ECAP 2013 only
1002.02	4	NW FW, east of N Main, adjacent to RECAP 1002.01
1038.00	4	SE FW, Riverside, south of Rosedale, Cobb Park, R/ECAP
1002.01	1	Northwest FW east of N Main, new R/ECAP 2015
1062.01	1	Southeast FW adjacent to RECAP 106202, Stop Six

Figure 105: Fort Worth Opportunity Zones with capital index scores

Contributing Factors of R/ECAPs

Over 270 comments and votes (over 15%) from public meetings and focus groups addressed the contributing factors to racially and ethnically concentrated areas of poverty. **Lack of investment in specific neighborhoods, lack of community revitalization strategies and deteriorated and abandoned properties** represented approximately 50% of the comments and votes received about R/ECAPs, pointing to needs for physical rehabilitation and investment in distressed neighborhoods. Lack of investment in specific neighborhoods received more votes (115) at public meetings across all issue areas than any other contributing factor. Participants at a public meeting held at FWHS administrative offices described the lack of public and private investment in communities on the east side of Fort Worth. They identified problems with crime, illegal drug use, squatters on vacant property, lack of maintenance, especially for vacant properties, and a lack of private investment in retail and services. Participants were concerned that investors were buying up properties for rental at increased prices, making them unavailable for individual ownership. Developers participating in a CFW focus group explained the challenges to development in the central city due to aging infrastructure and need for public investment to make private developments profitable.

Lack of investment was identified as a problem in west Fort Worth in the Las Vegas Trail neighborhood where, in 2017, the City of Fort Worth initiated a revitalization program beginning with public meetings to gather community input. Participants at these public meetings called for investments in people and place. Public meeting participants complained about the rental properties in Las Vegas Trail, where 78% to 91% of the households rent their homes and 5,500 residents live in apartments, duplexes and other rental housing within approximately one square mile. LVT residents said that many vacant and abandoned commercial buildings should be torn down. Many participants in LVT meetings talked about the need for supports for children and youth, including recreation opportunities.

Sample comments from public engagement:

- The communities that have been neglected for decades...have had absolutely nothing done to them.
- The City is investing at the edge of town allowing the interior of the town to disintegrate. The funds should be spread equally across the City.
- We could not live on our property [in southeast Fort Worth] without things being stolen and prostitutes on the corner. But I was fined for not mowing the grass.
- Trashcans stolen – if they can do that, what will stop them from coming into your house? Cannot walk down the street – prostitutes killed where kids play in the park, greenbelt not being mowed – this is a place where crime takes place [southeast Fort Worth].
- Talked to grocery stores about why they would not locate in the area. The reason they will not come is due to crime.
- No sit-down restaurants, too much fast food.
- [properties on] Evans and Ramsey [in southeast Fort Worth] have squatters and meth heads; who holds the owners accountable?
- Owner of a vacant home in east Fort Worth: Squatters are an issue, trash has been thrown on the property; I can't afford to improve the property because of historic designation.
- East side of the river has many abandoned properties; is there anything stopping an investor from buying ideal properties [and making housing unaffordable]?
- 33% of my neighborhood is rental. Houses are being bought to be rented, not owned and no one is keeping eyes on these properties.

- I made a \$229 million investment [Renaissance, in southeast Fort Worth]; Costs me twice as much to develop in southeast Fort Worth (as in other suburban areas). Storm sewers are 70 years old. Infrastructure is old. Drainage is a big issue. NEZ fee waivers are a joke. I didn't save \$150k through the NEZ. They promised but didn't come through. Wouldn't have been able to do it without vouchers (from FWHS).
- Increased density increases infrastructure problems [with aging infrastructure].
- Everybody wants to be a developer in southeast FW but won't do anything. [Many individual property owners.]
- [Las Vegas Trail neighborhood has] a lot of homeless, street is full. People don't have purpose. Kids are begging for food, veterans begging on LVT.
- [LVT] I see people constantly using illegal drugs. I hear about shutdowns (of businesses). We had stability growing up. Theft is a big problem. But I want to see people get helped with food and clothing. People are scared of what's around them.
- [LVT rental properties] Renters with multiple families in one house – eyesore – they aren't involved in the community.
- Need to add resources. We don't treat poverty. We created LVT. We built apartments and allowed them to cycle into despair.
- Abandoned hotel needs to be torn down.
- There's probably 10 to 12 houses that are vacant for rent/sale.
- The McDonald's closed – just another place to hang out – get rid of it.
- Arby's is for sale – tear it down.
- All the empty buildings make the neighborhood look terrible.
- LVT needs a community center
- No Boy & Girls Club.

Location and type of affordable housing and **loss of affordable housing** were identified as significant contributors to R/ECAPs in 25% of the comments and votes received at public meetings and focus groups. Sixty percent of respondents to the CFW survey who said they wanted to move from their current neighborhood said they had difficulty finding affordable housing in more desirable neighborhoods (CFW, 2017). Location and type of affordable housing, loss of affordable housing and increasing rents received a combined 158 votes across all issue areas in AFH public meetings. Developers of affordable housing participating in focus groups identified significant barriers to building in higher opportunity areas, including financing, unrealistically high property valuations and lack of support from the City. Neighborhood associations, residents and community development corporations identified problems associated with gentrification, rising rents and taxes, loss of affordable housing and decreasing diversity. Nonprofit service providers and residents blamed growing income inequality and low wages for preventing residents from accessing quality housing in high-opportunity areas.

Sample comments:

- We need to talk about the bottom end of the affordability market. The real challenge is we can't look for public assistance to solve the problem (not enough funding). We must find a way to have a decent, safe and sanitary house near where you work.
- Mixed-income is positive. It sells and works – we have three to four-year waiting lists. Gives low-income people access to quality.
- Problems with CFW impact fees – they are based on land valuation – valuations are unrealistic compared with neighboring properties. We [affordable housing developers] are asked to provide low-income housing but the City says they can't help. Land costs too high in high-opportunity areas. Need more soft funds – we can't mortgage them out – we need general obligation bonds.

- Attention needs to be paid to preserving existing housing – fix what we have in order to increase affordable housing.
- Worried that rents will go up after remodeling [of apartments].
- Incoming people make housing costs increase for those already trying to find a home here.
- We have great entertainment in our community (Southside), but lack of everything else. The area used to be diverse in every way but it is now homogeneous and we are narrowing who we are.
- Day labor companies don't pay a living wage.

Other participants in public meetings identified **source of income discrimination** and **private discrimination** as contributing factors to R/ECAPs preventing lower income minorities from moving into higher opportunity areas. A rigorous HUD study of landlord acceptance of vouchers in Fort Worth found that 85% of landlords in low poverty census tracts offering voucher-eligible apartments rejected candidates who would be paying with a housing authority subsidy (Cunningham et al., 2018). Eighty-one percent of similar landlords would not accept voucher-holders in medium poverty census tracts and 67% of landlords rejected vouchers in high poverty census tracts, forcing more low-income renters into higher poverty communities.

Community opposition was a recurring theme in comments received in the CFW Survey, especially in far north Fort Worth. Approximately 40% of CFW survey comments concerned opposition to the rumored relocation of public housing residents to far north Fort Worth. Respondents in other communities supported spreading affordable housing throughout the City without concentration in any one area. Many of those opposing affordable housing cited lack of public transportation, access to services and lack of employment opportunities to explain why low-income residents should not live in their community. Other opponents to increased affordable housing cited problems with over-crowded schools and strained public services, especially for policing, linking this issue to lack of public investment. Many were concerned that property values would go down by increasing affordable housing.

Sample comments from City of Fort Worth survey opposing affordable housing:

- We purchased a home based on a safe location and high-end neighborhood. We did NOT want public transportation access or our property values to be brought down and our safety to potentially be affected. Which is exactly what this will bring to our area. We work hard to live in and afford this area and the thought of someone getting it for nothing doesn't seem right. (CFW survey 304)
- Please do not bring the most dangerous district 8 to the safest district 7. (CFW survey 305)
- The far north Fort Worth area has limited economic opportunity at this time. (CFW survey 309)
- The city services to our area are extremely underserved and are not conducive to relocating government-assisted tenants. (CFW survey 313)
- Our zip code is nowhere near the needs [services] for these people [on publicly assisted housing]. For example we have no buses, we are not walking distance to any City things like food stamps office, JPS [county] hospital, VA hospital, Medicare and Medicaid [offices]. This is the reason we live where we live to stay far away from this. (CFW Survey 315)
- Bringing residents of Butler to Far N. FW is a huge mistake. We have already outgrown the basic services we have (ROADS). With the lack of emergency services (police response and ambulance response times) and road conditions this is not the place to put more residents. There is no access to public transportation or any type of assistance programs or job support. We have enough issues out here being the "forgotten child" of FW...please don't compound the problem. (CFW survey 322)
- We live in Haslet, TX and have heard that there might be 400+ people from a housing project relocated to our neighborhood from the City. We DO NOT WANT these people moved out to the apartments in Haslet, TX! We moved into this neighborhood to escape the crime that

can come from living in the city and we do not want these people relocated to the apartments in Haslet! (CFW survey 328)

- I was encouraged to take this survey because Section 8 housing is being proposed near my neighborhood. I am extremely disappointed to hear this. (CFW survey 347)
- I know many of my neighbors are coming to take this survey to express opposition to low-income housing being continued or expanded in our area. I just wanted to voice a dissenting opinion. Most of us have had hard times. I have appreciated everything ever done for me, by whoever was able to do it, to help me get to a place where I could sustain my family. I would begrudge no one that same help and I believe hard economic times shouldn't mean your kids can't go to excellent schools and it shouldn't mean you're unable to live in a safe neighborhood. So I welcome everyone who needs a home... (CFW survey 369)
- I do not support multifamily section 8 units on Keller Hicks in N Ft Worth. I believe it would negatively impact our schools and neighborhoods. With the development to the North along the 170 corridor, particularly Charles Schwab's construction of a new regional headquarters slated to employ 1,000 within a year to year & a half and 5,000 employees at full build out... Creating multifamily section 8 units will encourage developers to go elsewhere, thereby harming the local constituents, local tax base and local employment. (CFW survey 395)
- I do not believe that government subsidized housing should be located in middle class neighborhoods. Statistics tell us crime will increase and property values decrease. (CFW survey 444)

iii. Disparities in Access to Opportunity

Analysis

Education

i

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

The School Proficiency (SP) index uses school-level data based on the performance of fourth-grade students on state exams to describe neighborhoods (US Census block groups) with proficient schools. As school quality in a neighborhood improves, the score increases. The index ranges from a possible score of 0 to 100 and compares neighborhoods across Texas.

In the FWHS jurisdiction, almost 49% of the Hispanic population and 55% of the black population lives in block groups (a neighborhood census area smaller than a census tract) with school proficiency scores lower than 39 while about 24% of the Asian/PI population and 18% of the white population live in the same block groups (Figure 106). At the same time, almost 29% of the Asian/PI population and 34% of the white population lives in block groups with school proficiency scores greater than 80 while only about 11% of the Hispanic population and 13% of the black population live in similar block groups. However, families with children appear slightly less disadvantaged because almost 27% of these families live near high performing schools while only 30% live near low performing schools.

SP Scores	# of Block Groups	% White	% Black	% Hispanic	% Asian/PI	% Families w/child(ren)
0-9	58	1.8	16.5	5.6	2.8	4.6
10-19	96	5.2	15.8	14.3	6.5	8.9
20-29	81	4.2	7.6	13.1	5.2	6.6
30-39	106	7.1	15.5	15.7	9.6	10.4
40-49	94	7.9	7.9	12.2	10.0	9.0
50-59	115	10.6	7.7	11.3	9.9	9.9
60-69	107	12.6	6.6	7.9	12.1	10.1
70-79	130	16.6	9.3	8.8	15.3	13.2
80-89	109	15.5	8.5	7.1	14.3	13.2
90-99	110	18.5	4.7	4.1	14.3	14.0

Figure 106: School Proficiency index scores with block group population demographics for the FWHS jurisdiction (HUD Common Core/Great Schools 2014, Maponics 2016 and U.S. 2010 Decennial Census)

The disparities that exist between races and ethnicities in the FWHS jurisdiction persist and slightly increase at the regional level (Figure 107). Block groups in the DFW region with school proficiency scores lower than 39 contain over 51% of the Hispanic population and over 56% of the black population while only 19% of the Asian/PI population and 22% of the white population live near low-performing schools. Block groups in the DFW region with school proficiency scores greater than 80 contain almost 40% of the Asian/PI population, over 33% of the white population and only 11% of the Hispanic and black populations. Over 32% of families with children across the region live in block groups with school proficiency scores lower than 39.

SP Scores	# of Block Groups	% White	% Black	% Hispanic	% Asian/PI	% Families w/child(ren)
0-9	276	2.6	14.1	7.8	1.6	5.1
10-19	436	6.2	16.1	14.6	4.8	9.3
20-29	431	5.6	12.4	14.3	5.6	8.5
30-39	494	8.0	14.1	14.5	7.7	10.1
40-49	413	8.3	9.5	10.7	9.5	8.8
50-59	462	10.0	8.3	10.6	8.9	9.4
60-69	433	12.0	7.6	8.4	8.9	10.2
70-79	466	13.7	6.4	7.9	13.0	11.0
80-89	460	14.6	6.4	6.5	15.6	12.1
90-99	511	19.0	5.1	4.7	24.4	15.6

Figure 107: School Proficiency index scores with block group population demographics for the NTRHA region (HUD Common Core/Great Schools 2014, Maponics 2016 and U.S. 2010 Decennial Census)

ii.

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

According to Figure 108, the highest performing schools tend to occur in suburban locations outside I-820. In particular, northeast Tarrant County, near Eagle Mountain Lake, Kennedale and Mansfield in southeast Tarrant County, Benbrook and in southwest Fort Worth inside I-820 near Chisholm Trail Parkway. Meanwhile, the lowest performing schools concentrate in east and southeast Fort Worth. Other very low performing schools appear in/near Everman, White Settlement, Crowley, Edgecliff Village, Blue Mound, Sansom Park, Rockwood Park and Meacham Field. While school proficiency correlates strongly with segregation inside and south and east of I-820, many predominantly white areas also have poor performing schools. This appears to indicate that schools in segregated areas will not be strong performing, but it also indicates that reversing segregation trends in Tarrant County does not ensure access to better schools.

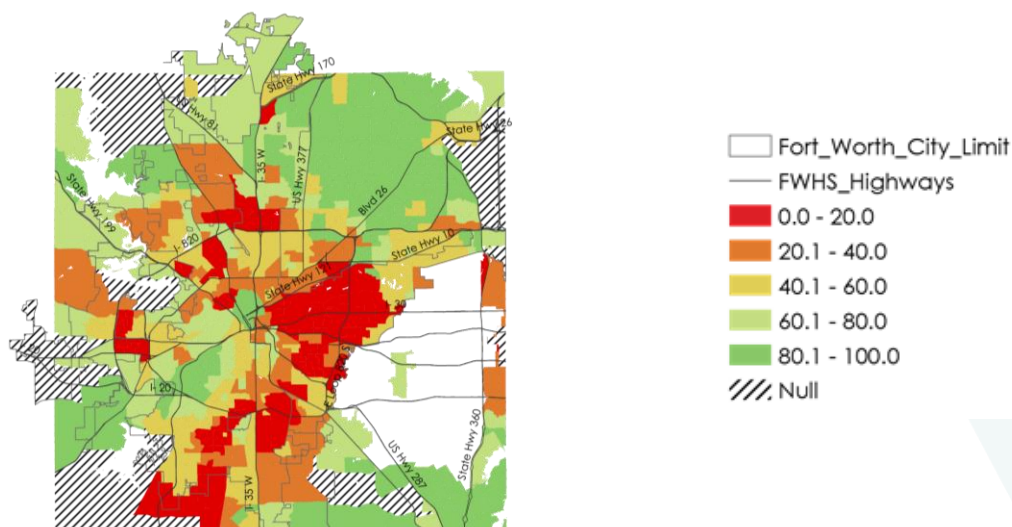


Figure 108: FWHS jurisdiction School Proficiency Index Scores (HUD Common Core/Great Schools 2014, Maponics 2016)

Figure 109 shows that the SP index experiences significant geographic variability throughout the region. The SP index for the NTRHA region shows that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have low-performing schools. School performance appears strongest in many suburban areas, especially those north of the two urban centers. Outside the urban cores, most of the remaining low-performing school communities occur in rural areas.

Legend

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

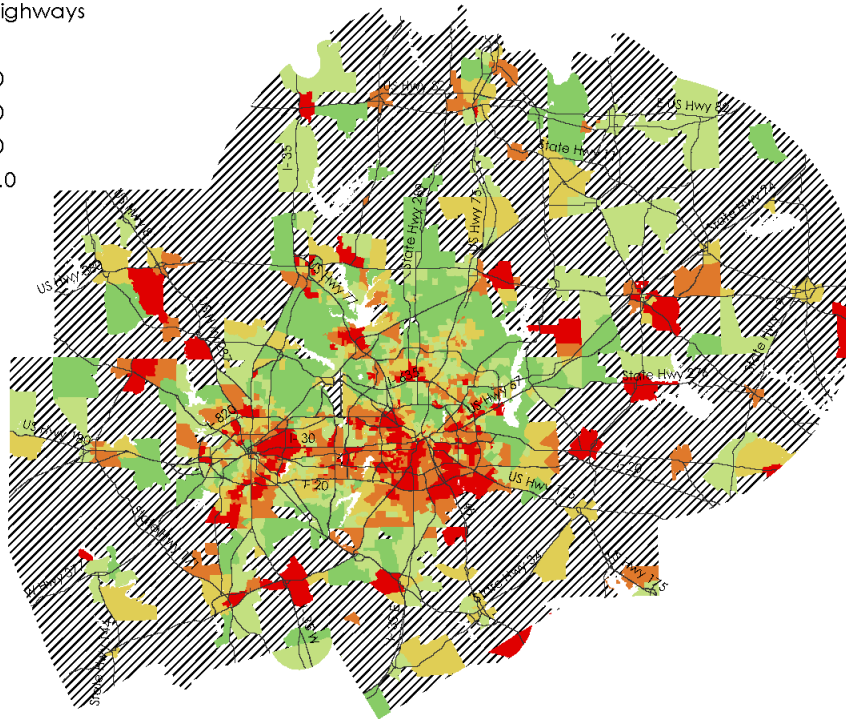


Figure 109: School Proficiency Index Map of the Region

iii.

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

In the context of fair housing, assessing disparities in access to proficient schools inevitably calls for consideration of the reciprocal relationship between housing and school policy. Scholars point to the effects of education policies on housing segregation and disparities in access to opportunities. Tegeler and Hilton (2017) list some of the key school policy drivers affecting housing segregation and disparities:

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

Participants in public participation events identified the importance of the location of proficient schools and school assignment policies to access to opportunity. ICP representatives stated that one of the primary reasons their clients choose to move out of historically segregated neighborhoods is to have access to higher performing schools. Participants stated that many families move into neighboring suburbs to meet residency requirements and get access to high-quality schools. Over 43% of children attending pre-school in Tarrant County are in private schools, and nearly 8% of high school enrollment is in private schools (Cedar Lake Ventures, Inc., 2015).

The state of Texas restricts its expenditures on education Figure 110 shows statewide per-student expenditures in constant 2014 dollars. In real terms, with the exception of an increase in 2009, per-student expenditures are below 2003 levels, and average expenditure levels after the recession of 2008/09 are \$400 less than before the recession. This is during a period of rapid growth in public school district enrollments across the state, including students who are English language learners and/or from impoverished households (Villanueva, 2015). Evidence shows that additional funding improves student performance outcomes by reducing class sizes, improving curriculum, addressing specific challenges, providing pre-kindergarten programs, retaining the best teachers and providing special programming for struggling learners (Lesley, 2010).

School Funding is Still Below Pre-Recession Levels

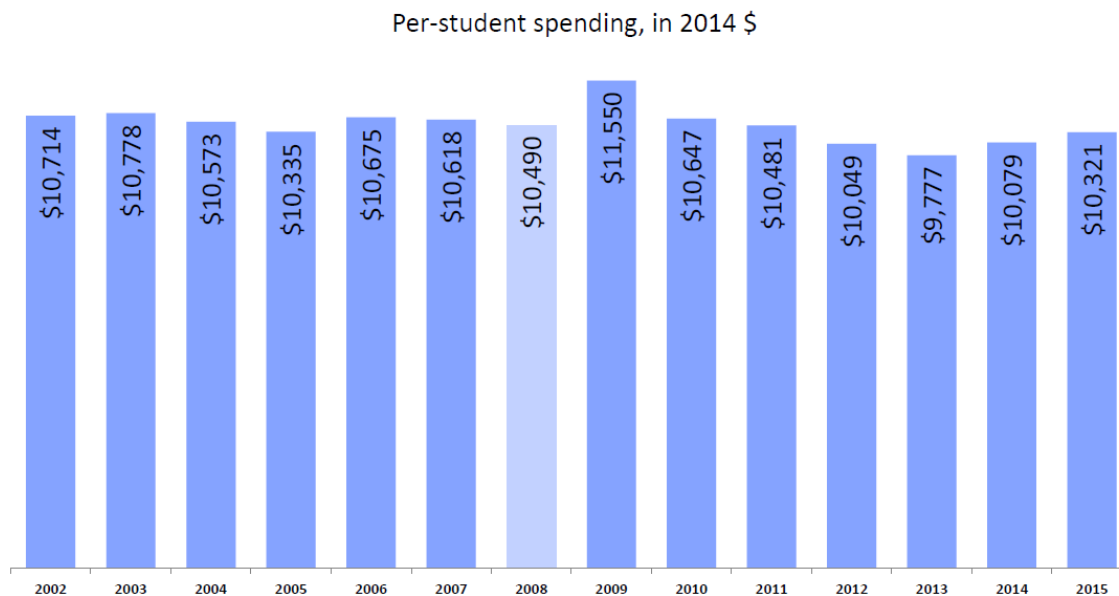


Figure 110: Texas per student spending 2002-2015 (CPPP analysis of TEA, LBB data)

Fifteen independent school districts are located in the FWHS jurisdiction. District performance varies widely as shown in Figure 111 (Texas Education Agency, 2016). Thirty percent of students attend FWISD, the only district classified as urban by TEA. The average school district value for percent of students economically disadvantaged is 51%. Seventy-six percent of FWISD students are economically disadvantaged.

District Name	# of Students	% of Students	% Black	% Hispanic	% Economically Disadvantaged	% English Language Learners	% Gifted/Talented	4-year Graduation Rate	STAAR % Passing or Higher	Total Revenue/Student	Operating Expense /Student
FORT WORTH ISD	86,869	30%	23%	63%	76%	31%	9%	85%	65%	\$ 9,884	\$ 9,500
KELLER ISD	34,099	12%	9%	22%	24%	7%	11%	95%	86%	\$ 10,089	\$ 8,285
MANSFIELD ISD	33,738	12%	28%	25%	38%	11%	7%	93%	83%	\$ 10,207	\$ 8,686
BIRDVILLE ISD	24,245	8%	9%	40%	57%	20%	10%	91%	79%	\$ 10,342	\$ 8,542
HURST-EULESS-BEDFORD ISD	22,780	8%	18%	29%	53%	14%	6%	95%	85%	\$ 10,148	\$ 7,990
EAGLE MT-SAGINAW ISD	19,158	7%	10%	37%	42%	9%	7%	95%	79%	\$ 10,309	\$ 8,218
CROWLEY ISD	15,050	5%	42%	30%	61%	14%	7%	95%	65%	\$ 10,978	\$ 9,043
GRAPEVINE-COLLEYVILLE ISD	13,768	5%	5%	23%	23%	9%	22%	96%	87%	\$ 12,139	\$ 9,007
CARROLL ISD	8,056	3%	2%	9%	1%	2%	24%	99%	97%	\$ 13,646	\$ 9,225
WHITE SETTLEMENT ISD	6,697	2%	7%	37%	54%	11%	6%	94%	78%	\$ 9,848	\$ 7,869
AZLE ISD	6,229	2%	1%	20%	50%	4%	7%	92%	77%	\$ 9,001	\$ 7,912
EVERMAN ISD	5,609	2%	38%	56%	89%	28%	4%	88%	72%	\$ 10,386	\$ 8,795
CASTLEBERRY ISD	4,044	1%	1%	77%	84%	34%	6%	88%	69%	\$ 10,479	\$ 8,128
LAKE WORTH ISD	3,296	1%	12%	59%	80%	21%	5%	95%	65%	\$ 12,036	\$ 9,831
KENNEDALE ISD	3,134	1%	21%	22%	40%	7%	7%	97%	80%	\$ 10,826	\$ 9,044
Total/Average	286,772		15%	37%	51%	15%	9%	93%	78%	\$ 10,688	\$ 8,672

Figure 111: Tarrant County Independent School District Performance 2015-16 (TEA 2016)

Castleberry ISD in northwest Fort Worth and FWISD have the highest rates of English language learners at 34% and 31% respectively. Grapevine–Colleyville ISD and Carroll ISD in far northeast Tarrant have significantly more students in gifted and talented programs (22% and 24%) while also sharing the highest revenue per student (\$12,139 and \$13,646 respectively). Graduation rates and the percent scoring passing or better on the state STAAR test of academic performance are significantly lower in FWISD than the average area school district.

Significant disparities in student outcomes exist in Tarrant County for economically disadvantaged, Hispanic and black students as compared with white students. Figure 112 shows performance outcomes for special student population with Tarrant County schools. Economically disadvantaged, Hispanic and black students fall behind white students in meeting third-grade reading standards and other outcomes (Center for Public Policy Priorities, 2015).

Student Groups in Tarrant County (2015 data)	Percent of All Students	Do Not Meet Third-Grade Reading Standards	Must Repeat 9th Grade	Drop out of High School	Do Not Enroll in Texas Colleges	Drop out of College
All Students		60%	11.50%	7.30%	49.10%	53.00%
Economically Disadvantaged	55.00%	73.00%	15.70%	9.50%	55.10%	63.80%
Hispanic	40.50%	69.00%	15.00%	9.80%	55.00%	62.90%
White	32.00%	45.00%	6.50%	4.10%	46.00%	46.50%
Black	19.10%	75.00%	15.40%	11.10%	51.20%	67.80%

Figure 112: Tarrant County student outcomes by special groups (CPPP, 2015)

Children at Risk ranks schools based on an index composed of student academic performance (STAAR test), student academic improvement and a campus score that compares schools with equal rates of low-income students (Children at Risk, 2017). Figure 113 shows the locations of schools in the Fort Worth area from different school districts colored by their percentile scores A (blue) through F (red). Schools rated F are clustered in southeast and east Fort Worth while suburban schools, with some exceptions, score higher.

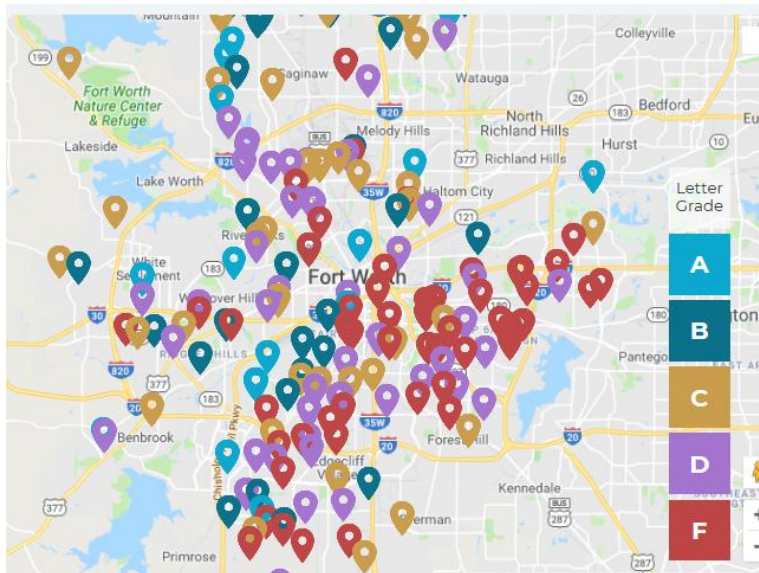


Figure 113: Children at Risk rankings of schools in Fort Worth (2017)

Fifty-one of the 81 (62%) elementary schools in the FWISD are graded D or F by Children at Risk with an average passing rate of 10% on the Texas STAAR test for reading. Thirty-one percent (31%) of students at these schools are black compared with a district average of 23% black.

Only one of 27 (4%) elementary schools in the Keller ISD, located in far north Fort Worth, was graded D+ and none were graded lower. Children at all school districts are generally assigned to elementary schools by their place of residence (Fort Worth ISD, 2018; Kidd, 2018). FWISD employs special programs that allow some flexibility for children to attend different schools, including the Gold Seal Programs of Choice (high school) and the Schools and Programs of Choice open at all grade levels by application (Fort Worth ISD, 2018). Five of the nine elementary Schools of Choice are graded D or F by Children at Risk. In 1995, the State of Texas mandated that a parent may request a transfer out of a failing school into a higher performing school under the Public Education Grant (PEG) program (Texas Education Agency, 2018). Parents may request a transfer to another district but the district may put the family on a waiting list. Forty-seven FWISD schools are on the PEG list, including some of FWISD's Schools of Choice. Few families take advantage of the opportunity to leave failing schools, and where students have left schools, the schools have declined rather than improved (Thevenot, 2009).

The Fort Worth Independent School District collaborates with many agencies to provide supplemental programs at its lower performing schools. GO Centers, in a partnership with United Way of Tarrant County, at 13 middle schools and Eastern Hills High School support the transition to high school and plan for a college education and career. The centers provide coaching, computers and field trips to support finishing high school and attending college (United Way of Tarrant County, 2018)

b. Employment

i

For the protected class groups HUD has on which provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

The Labor Market Engagement (LME) index provides a description of the relative intensity of labor market engagement and human capital in a neighborhood compared with other census tracts in the nation. The index reflects the percent of working age adults employed or the labor force participation rate. The values range from 0 to 100. As the LME index score increases, the labor force participation in a neighborhood is stronger compared with other census tracts.

Both Hispanics and blacks appear to be disadvantaged based on the LME in the FWHS jurisdiction (Figure 114). In this jurisdiction, almost 37% of the Asian/PI population and almost 38% of the white population live in census tracts with LME scores greater than 80 while only 13% of the Hispanic population and 15% of the black population live in similar census tracts. FWHS census tracts with LME scores lower than 39 contain almost 50% of the Hispanic and over 41% of the black populations but these same census tracts contain less than almost 13% of the Asian/PI and white populations. This jurisdiction does not fare well when compared to the region because each race and ethnicity has a greater proportion of its total population living in areas with low LME scores and a lesser proportion of its total population living in areas with high LME scores. The FWHS jurisdiction's racial and ethnic disparities regarding the LME index appear more severe than the region but the region (Figure 115) still suffers from significant disparities. Census tracts in the DFW region with LME scores lower than 39 contain over 47% of the Hispanic and over 42% of the black populations, but these same census tracts contain less than 12% of the Asian/PI population and less than 18% of the white population. NTRHA regional census tracts with labor market engagement scores greater than 80 contain almost 53% of the Asian/PI population, over 37% of the white population and only 17% of the black and 13% of the Hispanic populations.

Families with children appear to be disadvantaged in the FWHS jurisdiction because almost 25% of families with children live in census tracts with LME scores lower than 39. This trend also appears regionally because over 27% of families with children live in census tracts with LME

scores lower than 39. For the other protected groups, the FWHS jurisdiction performs like the NTRHA region.

For residents living in poverty, the population living within the FWHS jurisdiction and the region suffer similar disadvantages based on the LME index. Almost 49% of the residents with incomes at or below 30% of area median income (AMI) within the FWHS jurisdiction and over 47% within the region live in census tracts with LME scores lower than 39. In both the FWHS jurisdiction and overall region, about 15% of the ami30 population live in census tracts with LME scores greater than 80. In the FWHS jurisdiction and overall region, about 15% of residents with incomes at or below 50% of the AMI live in census tracts with LME scores greater than 80 and 42% live in census tracts with LME scores lower than 39. Almost 31% of the residents with incomes at or below 80% of AMI within the FWHS jurisdiction and about 34% within the region live in census tracts with LME scores lower than 39. In the FWHS jurisdiction and the NTRHA region, about 20% of residents with incomes at or below 80% AMI live in census tracts with LME scores greater than 80. In the FWHS jurisdiction, the limited English proficiency population appears significantly disadvantaged with over 54% living in census tracts with LME scores lower than 39 and only 11% living in census tracts with LME scores greater than 80. In the region, over 47% live in census tracts with LME scores lower than 39 and 14% live in census tracts with LME greater than 80.

While the foreign born and disabled populations still suffer disadvantage when compared to the white population, they do not suffer as much as some of the other protected classes. In the FWHS jurisdiction, about 43% of the foreign-born population lives in census tracts with LME scores lower than 39 and almost 19% lives in census tracts with LME scores greater than 80. In the region, almost 38% live in census tracts with LME scores lower than 39 and 24% live in census tracts with LME scores greater than 80. In the FWHS jurisdiction, 34% of residents with a disability live in census tracts with LME scores lower than 39 and over 20% live in census tracts with LME scores greater than 80. In the region, about 38% live in census tracts with LME scores lower than 39 and 19% live in census tracts with LME scores greater than 80. The white population equals or outperforms all protected classes in the FWHS jurisdiction and the region for the LME index.

LME Scores	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	25	1.1	14.8	10.9	2.0	13.6	8.5	5.3	12.4	9.3	4.6	8.0
10-19	22	2.2	6.7	12.0	1.5	10.1	9.8	6.1	12.5	9.6	4.6	6.9
20-29	24	4.4	6.3	13.6	3.7	12.7	11.7	9.1	15.4	12.2	7.2	8.6
30-39	29	5.3	13.4	13.0	5.9	12.4	12.4	10.9	14.0	12.1	8.2	10.5
40-49	28	9.1	5.6	8.8	5.4	7.7	9.9	9.3	7.3	6.8	8.5	9.7
50-59	31	9.9	10.1	8.9	8.4	10.7	11.2	11.4	8.6	8.7	9.4	11.5
60-69	26	9.5	9.3	7.1	11.7	6.8	8.1	9.3	6.6	7.7	9.2	8.0
70-79	52	20.6	18.7	12.5	24.6	11.5	14.1	19.0	11.9	15.1	18.5	16.5
80-89	50	24.0	11.4	9.5	24.7	9.1	9.9	13.7	8.0	12.6	19.4	13.4
90-99	32	13.9	3.8	3.7	12.2	5.5	4.5	5.8	3.3	6.0	10.4	6.9

Figure 114: Demographics of census tracts in FWHS jurisdiction by Labor Market Engagement Index scores for protected groups (HUD, ACS 2013 and U.S. 2010 Decennial Census)

LME Index	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	73	1.4	11.7	6.0	0.8	9.6	6.1	3.9	6.0	4.4	3.2	5.9
10-19	95	3.1	11.5	11.6	1.7	11.8	9.8	7.4	10.9	8.3	6.0	9.0
20-29	114	5.8	8.6	14.7	4.0	13.0	12.0	10.7	15.6	12.4	8.4	10.4
30-39	137	7.7	10.8	14.9	4.6	13.1	14.1	11.9	15.2	12.6	9.7	12.2
40-49	135	9.6	7.9	11.8	5.4	11.0	12.6	11.8	11.7	10.0	9.7	11.3
50-59	129	10.1	9.7	9.8	6.6	9.4	10.4	10.8	9.1	8.6	9.7	10.8
60-69	130	10.4	10.8	8.9	10.2	8.4	9.6	10.6	9.0	9.1	10.1	9.7
70-79	166	14.8	12.2	8.9	13.7	8.3	10.2	12.5	8.0	9.9	12.8	11.3
80-89	164	16.1	9.1	7.5	17.9	7.3	7.7	9.9	7.3	10.4	13.5	9.6
90-99	250	21.1	7.7	6.0	35.0	8.1	7.6	10.4	7.1	14.2	16.9	9.6

Figure 115: Demographics of census tracts in NTRHA region by Labor Market Engagement Index scores for protected groups (HUD, ACS 2013 and U.S. 2010 Decennial Census)

The Jobs Proximity (JP) index quantifies access to jobs in a census block group as a function of distance to all job locations within a greater metropolitan area, with larger employment centers weighted more heavily (HUD, 2017). Four hundred sixty-five block groups in the FWHS have JP scores below 50 while 541 have scores of 50 or higher. Fifty-one percent of black residents and nearly 52% of Hispanic residents live in block groups with JP scores below 50 while only 44% of white residents live in block groups with scores below 50. Nearly 49% of families with children live in block groups with JP scores below 50.

JP Scores	# of Block Groups	% White	% Black	% Hispanic	% Asian/PI	% Families with children
0-9	107	8.7	14.4	12.2	11.7	11.3
10-19	85	7.8	6.5	8.5	7.8	7.9
20-29	92	9.2	10.2	10.0	10.7	10.0
30-39	97	10.1	10.2	10.3	9.0	10.4
40-49	84	8.2	9.4	10.4	9.6	9.1
50-59	109	13.3	8.8	10.5	11.0	12.1
60-69	104	11.8	12.0	8.3	10.8	10.9
70-79	110	11.8	9.3	9.5	11.4	10.8
80-89	112	10.2	11.2	10.4	9.2	9.8
90-99	106	8.8	7.9	9.9	8.9	7.8

Figure 116: Jobs Proximity Index Scores by census block groups with protected class demographics, FWHS jurisdiction (HUD, ACS 2013 and U.S. 2010 Decennial Census)

Figure 117 displays the number of block groups scoring in each decile of the JP index along with the percentage of protected groups living in that decile in the NTRHA region. Fifty-seven percent of black residents live in block groups with JP scores below 50 while 61% of white residents live in block groups with JP scores below 50. The same pattern exists for Hispanic residents (63%) and families with children (65%).

JP Scores	# of Block Groups	% White	% Black	% Hispanic	% Asian/PI	% Families w/child(ren)
0_to_9	439	8	14	12	8	10
10_to_19	437	9	11	11	11	10
20_to_29	441	11	12	10	11	11
30_to_39	442	12	10	11	11	12
40_to_49	436	11	10	10	13	11
50_to_59	439	11	9	9	10	10
60_to_69	441	11	8	9	9	10
70_to_79	437	10	8	10	8	9
80_to_89	436	9	9	9	9	9
90_to_99	435	8	8	9	9	7

Figure 117: Jobs Proximity Index Scores by census block groups with protected class demographics, NTRHA region (HUD, ACS 2013 and U.S. 2010 Decennial Census)

ii.

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

According to Figure 118, north and northeast Tarrant County appear to have the most consistently high LME index scores. The Fort Worth museum district, Texas Christian University, Mansfield and parts of west Tarrant County also have high LME index scores. Suburban labor market engagement appears weaker to the south and northwest with moderate or worse scores prevailing. Southeast and northwest Fort Worth inside I-820 have very poor LME scores, which directly corresponds with the location of many R/ECAPs and Hispanic and black segregation.

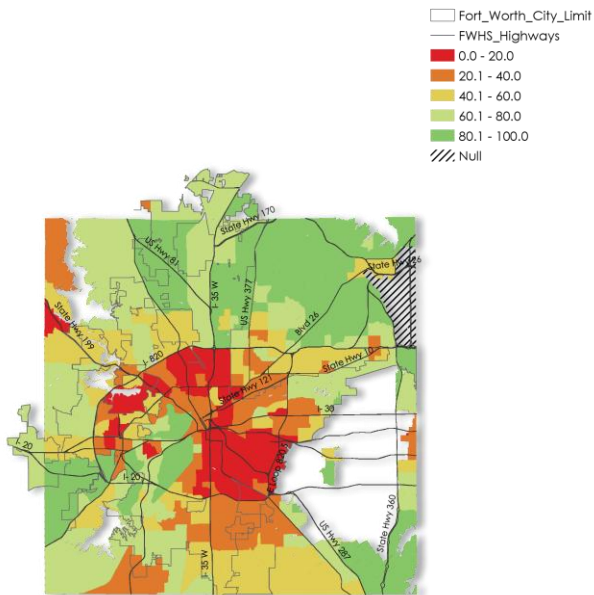


Figure 118: Labor Market Engagement Index Map of FWHS jurisdiction (HUD, LEHD 2014)

Figure 119 displays JP scores by census tract for the FWHS jurisdiction. Greatest access to jobs traces major highways. Southeast Fort Worth has the highest concentration of low scores for job proximity.

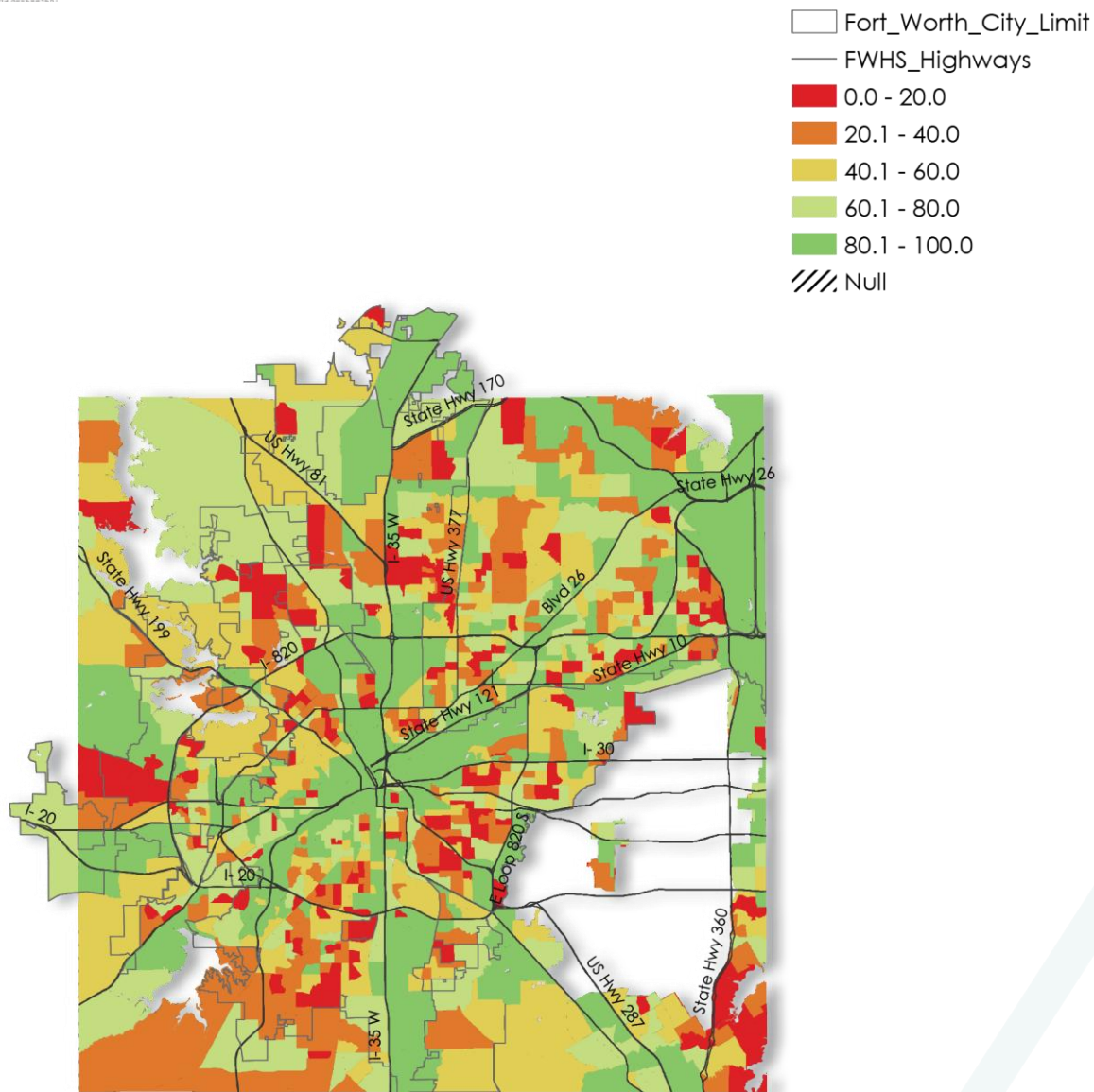


Figure 119: FWHS jurisdiction Jobs Proximity Index (HUD, LEHD 2014)

At the regional level, Figure 120 shows that the LME index experiences clear trends. The labor market indices for Dallas and Fort Worth show that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have lower labor market engagement. The suburban areas within the NCTCOG planning area have the strongest labor market engagement; however, some suburban areas in Dallas and Tarrant County do not score as well and south and southeast Dallas County perform poorly. Most rural census tracts have at best a moderate LME score with exceptions in Cooke, Ellis and Parker counties. Figure 121 displays the average JP score for each block group in the NTRHA region. Lower JP scores are found in the north and east regions of the jurisdiction. Areas of highest access to jobs trace the highway system with north Dallas having larger areas with the highest scores. Greater access to jobs extends into northeastern Tarrant County.

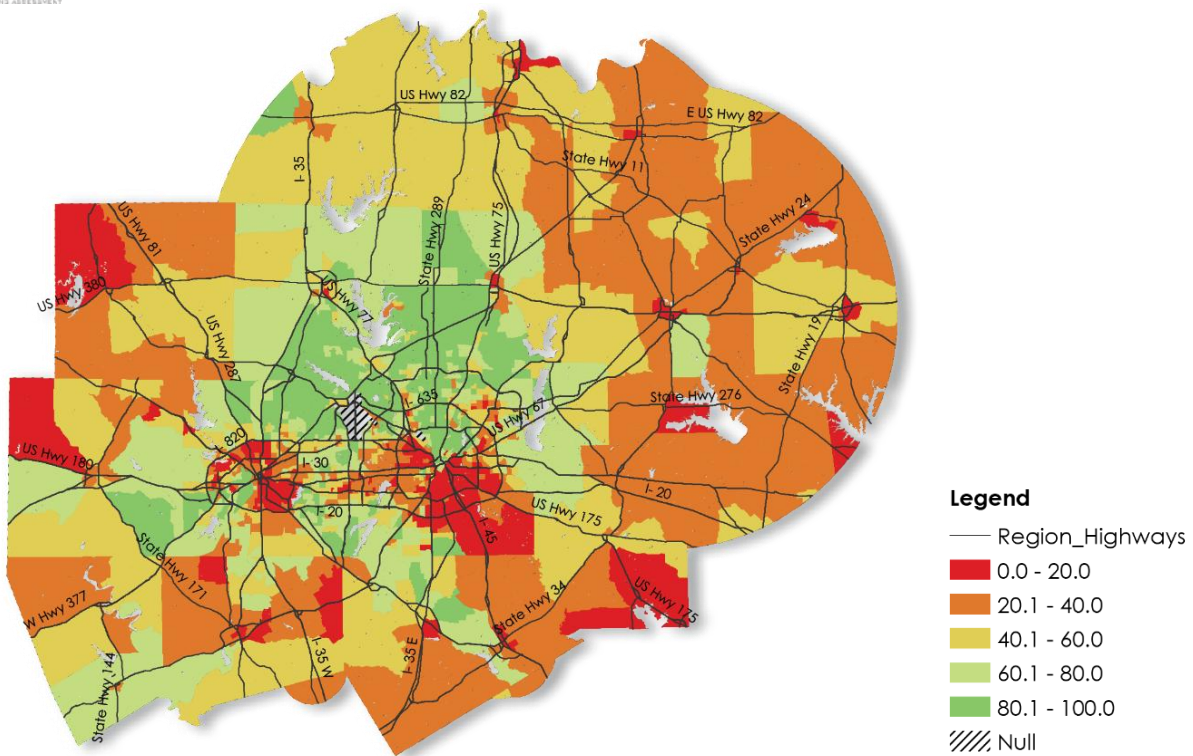


Figure 120: Labor Market Engagement Index map for the region (HUD, LEHD 2013)



Figure 121: Job Proximity Index scores by block group for NTRHA region (HUD, LEHD 2013)

iii.

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

Participants in public engagement identified a significant mismatch between the location of affordable housing and the location of good jobs, exacerbated by a lack of affordable transportation options. The City of Fort Worth's new strategic Economic Development Plan (EDP) also finds that Fort Worth residents are increasingly dependent on jobs in cities outside Fort Worth (City of Fort Worth, 2018). The EDP process included stakeholder roundtables during the spring of 2017 with employers, real estate developers, industry and health-care representatives and educators. The process did not include housing or transportation roundtable discussions, but the report recommends housing as a stimulant to economic development. The EDP finds that, while the City of Fort Worth had the greatest net population increase of any U.S. city from 2010 to 2015, growth was in greater single-family residential development rather than business and economic development (TIP Strategies, 2017). Findings from the report include:

- Fort Worth has experienced very little wage growth and weak job growth in high-wage occupations.
- Job growth in the Fort Worth metropolitan area from 2010 to 2016 was 14% compared to 19% in the Dallas area.
- STEM (science, technology, engineering and math) talent is lacking in the Fort Worth area.
- Transportation and warehousing sectors have the City's largest share of employment followed by aerospace manufacturing, life sciences, oil and gas, and tourism.
- The near Southside includes the DFW area's largest concentration of medical jobs.
- Opportunities for growth exist in research and development, health-care and life sciences.

Figure 122 displays the number of jobs per household in the Fort Worth metropolitan division (TIP Strategies, 2017). The EDP recommends that the City maintain a ratio of two jobs for every household. The report anticipates that, without changes, the surrounding suburban cities will become more commercial and industrial while Fort Worth becomes more residential without the jobs needed to support its residents.

JURISDICTION	JOBS-HOUSEHOLD RATIO 2005	JOBS-HOUSEHOLDS RATIO 2040
City of Fort Worth	2.06	1.74
Fort Worth ETJ (extra territorial jurisdiction)	1.95	1.58
Four-county area (Tarrant, Dallas, Collin, and Denton)	1.80	1.91

Source: NCTCOG Regional Forecast for 2040

Figure 122: Jobs-to-households ratio 2005 and 2040 (forecast) (TIP Strategies, 2017)

The City of Fort Worth has more vacant and developable land available than any other city in the region, creating opportunities for economic development, including infill and redevelopment (TIP Strategies, 2017). Figure 123 shows that Fort Worth contains 70,661 acres of vacant and developable land, more than twice that of Dallas, its nearest competitor.

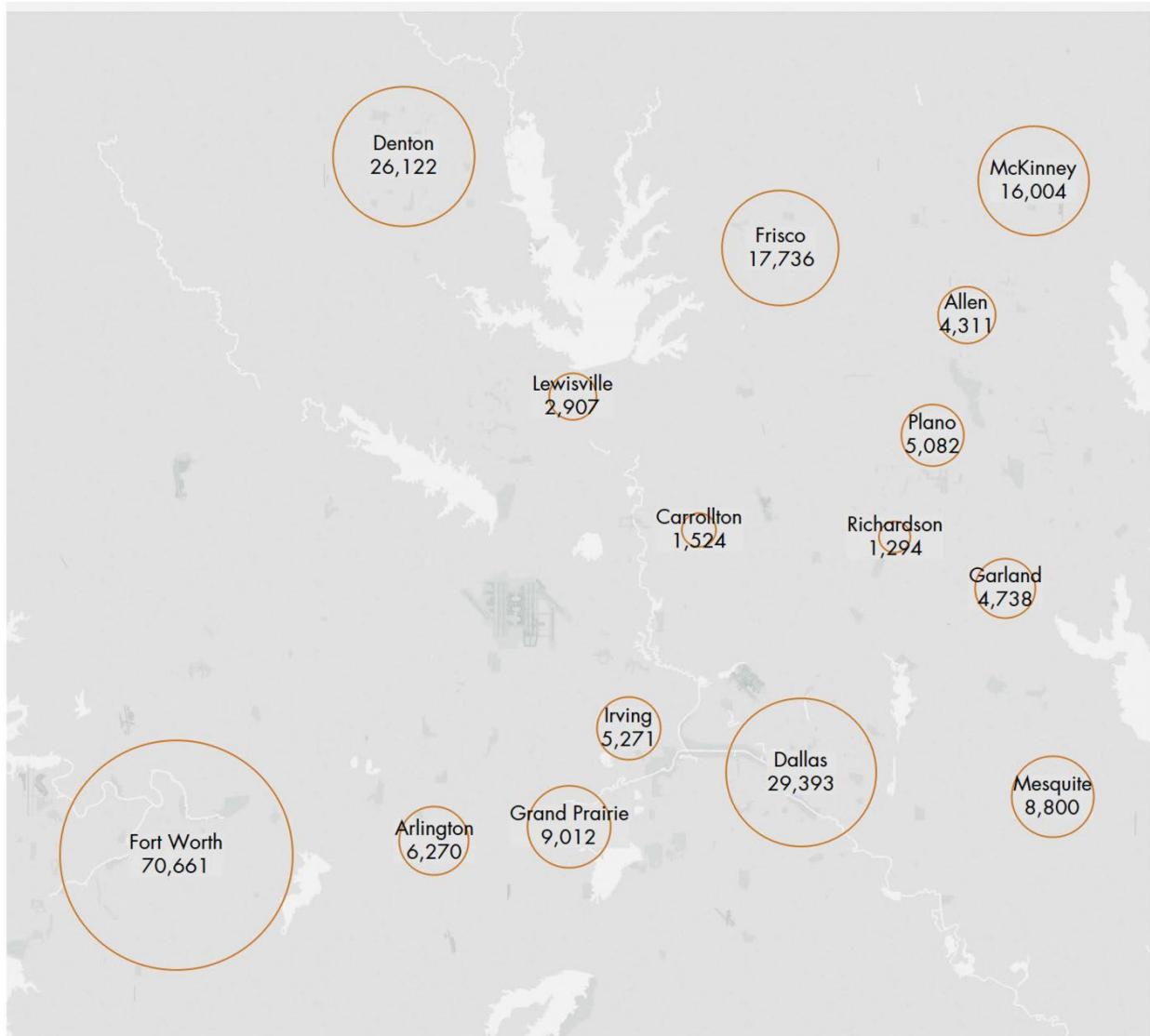
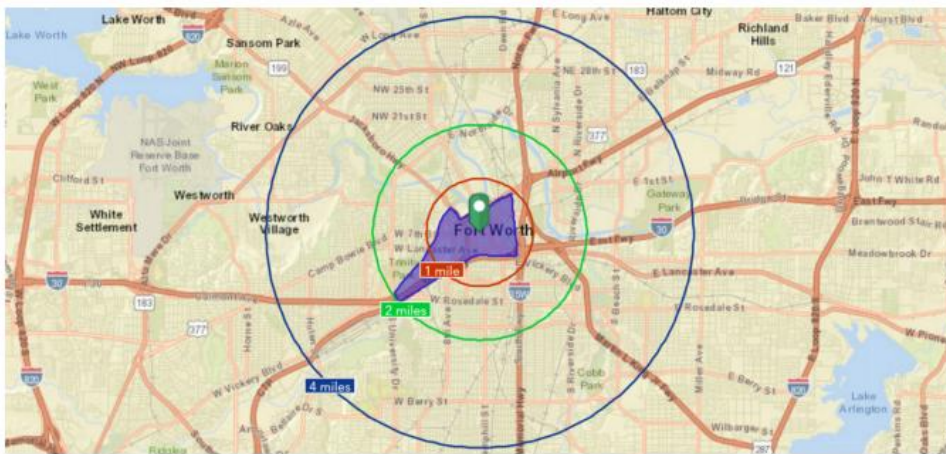


Figure 123: Vacant land by city in the DFW area in acres (TIP Strategies, 2017)

The EDP recommends that the City rapidly increase the density of mixed-use residential development in downtown and surrounding urban districts in order to stimulate commercial business developments and the expansion of technical and professional jobs. No mention is made of incorporating housing affordable to service and support workers necessary to these developments, but the report recommends economic development activities in six traditionally lower income and distressed communities near the city center. The EDP recommends the development of 4,000 net new housing units per year in the four-mile radius surrounding downtown, shown in Figure 124 (TIP Strategies, 2017). The report targets economic development and increased housing density in Stop Six, Evans-Rosedale, West Camp Bowie, Altamesa-McCart, Near Northside and East Lancaster, all lower income communities within the four-mile radius. The EDP recommends that the City align public investments along targeted corridors to increase economic development in areas needing revitalization while limiting unwanted land uses, including homeless shelters and car lots. The EDP recommends a bond program and incentives to stimulate investment in these areas. The EDP also calls for collaboration between employers and training partners to increase the pipeline of skilled workers.

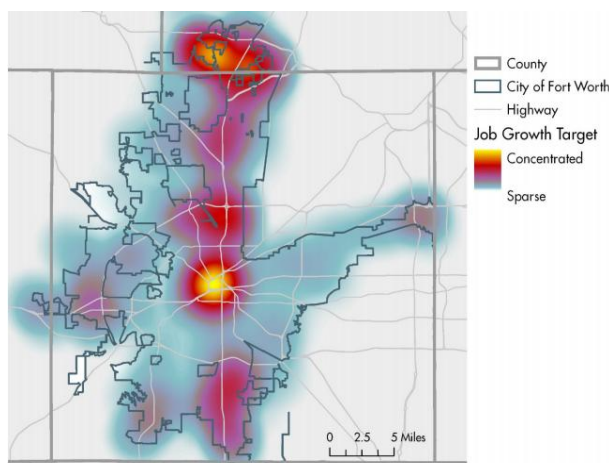


Geography	2000 Pop.	2010 Pop.	2016 Pop.	2000-2010 Annual % Chg.	2010-2016 Annual % Chg.
CBD 1-Mile	7,113	6,584	8,254	-0.7%	+4.2%
CBD 2-Mile	25,751	24,476	27,562	-0.5%	+2.1%
CBD 4-Mile	160,648	159,489	168,655	-0.1%	+1.0%
City of Fort Worth	545,993	744,973	854,113	+3.6%	+2.4%

Sources: urbanSCALE.com, Esri Community Analyst, TIP Strategies.

Figure 124: Population growth trends in Fort Worth's urban core 2000-2016 (TIP Strategies, 2017)

Figure 125 shows projected areas of job growth by 2040, building on North Central Texas Council of Governments forecasts (TIP Strategies, 2017). This adjusted forecast by Fregonese Associates incorporates the opportunity for development created by vacant land. The hottest areas of job growth are downtown and in the Alliance Airport area (marked in yellow). Concentrated job growth should also be possible for several miles outside the downtown area, in south Fort Worth and north Fort Worth.



Source: Fregonese Associates (FA) scenario analysis

Figure 125: Fort Worth job-growth target areas forecast to achieve 2:1 Jobs to Housing ratio by 2040 (TIP Strategies, 2017)

Figure 126 shows in more detail the number of jobs that could be developed between 2005 and 2040 using Fort Worth's vacant land, redeveloping land in the downtown area and implementing economic development strategies (TIP Strategies, 2017). Significant job growth could be created in areas currently adjacent to lower income communities, including the near northside and southeast Fort Worth.

SUB AREAS	NCTCOG BASE 2005 (TOTAL)	NCTCOG FORECAST 2040 (TOTAL)	NCTCOG FORECAST 2045 (TOTAL)	FORECAST INCREASE 2005-2040 (INCREMENT)	FA GROWTH TARGET 2005-2040 (INCREMENT)	COG VS FA COMPARED (DIFFERENCE)	BUILDABLE VACANT LAND (ACRES)
Downtown-Near East	121,829	239,866	246,121	118,037	118,037	No change	705
East	40,704	59,757	61,978	19,053	21,613	+2,560	1,030
Inner West	40,797	66,930	68,973	26,133	26,133	No change	288
Near North	82,389	177,071	185,448	94,682	114,272	+19,590	7,206
North-Alliance	13,398	40,801	43,766	27,403	95,490	+68,087	5,000
Northwest	30,191	40,496	41,568	10,305	15,260	+4,955	792
South	33,512	66,681	69,907	33,169	59,295	+26,126	3,351
Southeast	42,544	69,510	72,446	26,966	26,966	No change	1,329
Southwest-Chisholm Trail	55,390	101,910	105,793	46,520	46,520	No change	2,169
West-Base & Lockheed	4,353	10,543	11,999	6,190	23,607	+17,417	1,572
Total	465,107	873,565	907,999	408,458	547,193	138,735	23,442

Source: Fregonese Associates (FA) scenario analysis; NCTCOG Regional Forecast for 2040

Figure 126: Job growth targets by sub-area from FW EDP

The EDP holds up the Alliance Airport area as a model for economic development. Figure 126 above shows the problems posed to lower income households trying to access these jobs. Consultations with local transportation experts indicated that the location of employers in Fort Worth and trends toward large employer campuses present problems for providing affordable access for transit-dependent workers through traditional fixed route service. Jobs in the Alliance Corridor are not densely concentrated enough to make public transit efficient. Public buses may only stop along the perimeter of large, low-density corporate campuses, making the last-mile/first-mile transit to work up to 3.5 miles at Alliance (Dupler, 2017). New trends in retail centers with very large campuses present problems for transit similar to that of large employer campuses and are very difficult to serve. To address this need, Alliance Link started on-demand first-and-last-mile transportation from transit stops to employment destinations in the Alliance area for \$1 per trip including 17 stops and available during morning and evening commuting times seven days per week. Service started in July 2018 (Spare Labs, Inc., 2018).

Alliance is one of the City's hottest employment growth centers, but it is located 14 miles from the concentration of R/ECAPs in southeast Fort Worth. Service by the Fort Worth Transit Authority requires a trip of over two hours from southeast Fort Worth to Alliance. No collaborative programs have emerged between The T and employers at the Alliance Business Park. One employer has staggered shift start times to begin at 6:30 AM, 7:00 AM and 7:30 AM in order to relieve congestion in and out of parking lots at shift change, making the situation more difficult for obtaining significant ridership on buses to and from Alliance at any one time. The numbers of employees using transit to Alliance are understandably low (typically around 10) given the service problems and do not warrant additional buses (Dupler, 2017). Employees must arrive very early for their shifts and must wait until start time. These issues are especially difficult for families with children and other dependents. Limited public transit handicaps Fort Worth when pursuing corporate relocations from parts of the country with substantially better transit service. For example, Amazon's request for proposal for relocation required access to mass transit (Amazon, 2017).

Low-income residents of southeast Fort Worth could also have access to significant numbers of jobs in Arlington, including manufacturing (General Motors), entertainment (Six Flags) and other service industries. Arlington does not participate in the Fort Worth Transportation Authority and no bus service can pass through or stop in Arlington. Arlington is a city of nearly 100 square miles located 12 miles east of downtown Fort Worth and 20 miles west of downtown Dallas, presenting an enormous barrier to access to employment for people who need public transportation. Figure 127 shows the number of jobs paying over \$39,000 accessible within a 30-minute trip using

public transit from residential locations in the DFW region. Darker colors indicate fewer jobs and lighter colors indicate more jobs. Residents of Fort Worth have relatively much lower access to good jobs with public transit. The figure also shows the complete lack of access to transit in the cities between Dallas and Fort Worth.

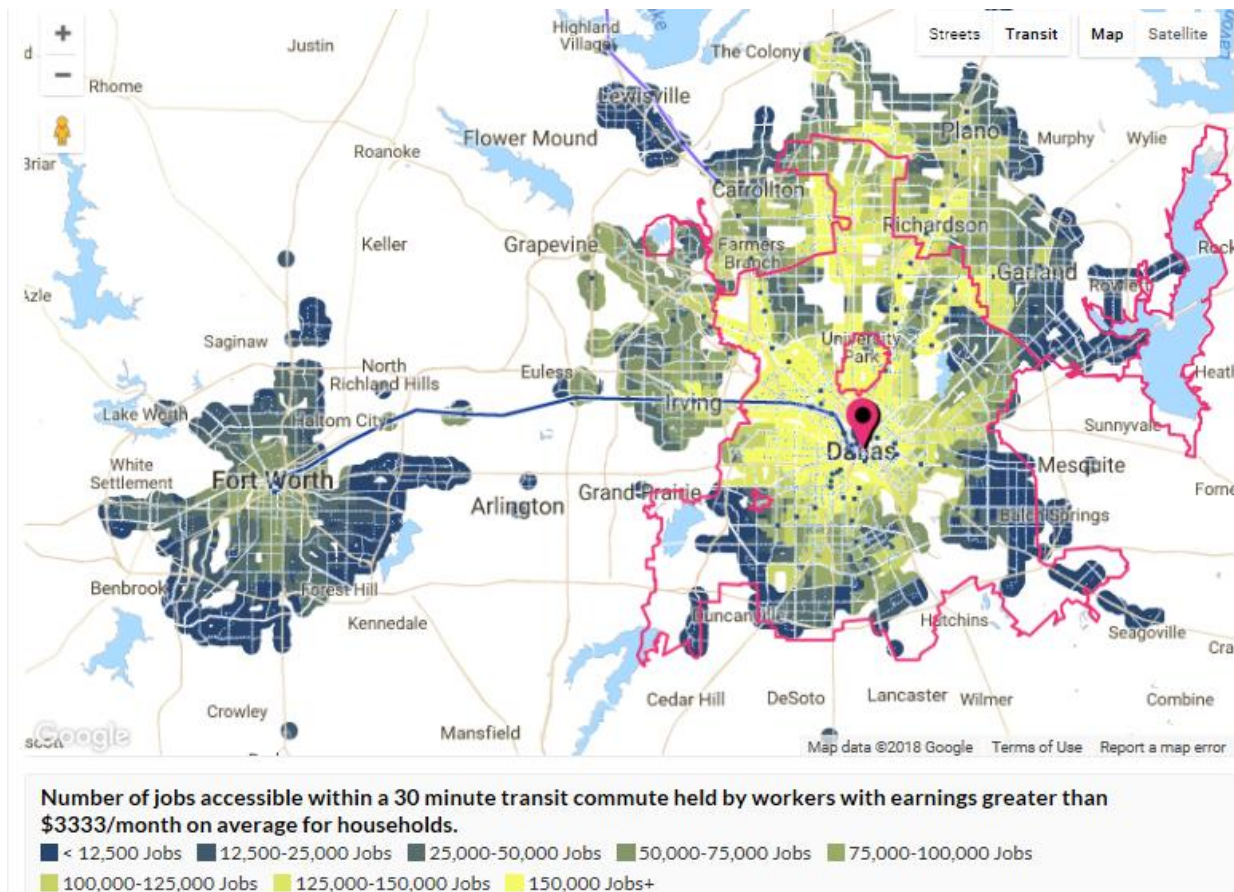


Figure 127: Number of jobs paying more than \$39,000 per year located within a 30-minute trip on public transit, DFW, AllTransit, LEHD 2015

Sample comments received from AFH public engagement:

- Where the people are [living] – the jobs are not there. There is a bus line but schedules of the bus do not meet the [work] schedules of the low-income people [needing transportation].
- Public transport is not available to evening workers. The busses stop before we are off [work] – Uber makes a killing [from transporting low-income workers after the busses stop running] (CFW Survey 32).
- Public transportation outside city limits and to the far reaches of Fort Worth [is] not robust enough to allow people in low rent housing areas to get to potential jobs. (CFW Survey 47).
- Without needed transportation, people cannot get to all the jobs available in this area and there are plenty of places around Fort Worth where we could be adding great housing. For example: if it were easy to get from Stop Six (where we could be building a TON of great housing), to Alliance (where there seems to be a ton of new jobs) on safe, efficient, affordable transportation, we could see all kinds of benefits in both areas (CFW Survey 50).

Many participants in public engagement also referred to lack of access to opportunity due to high housing costs. Figure 128 compares median monthly earnings per wage earner with median estimated rents and median estimated values of single-family homes in Tarrant County from 2011 through 2016 (Zillow, 2018; United States Census Bureau, 2016). Home values increased 39% and rents increased 18% while earnings increased only 2% during the five-year period (Zillow, 2018; United States Census Bureau, 2016). Multi-family rents increased by 26% from 2012 to 2017 (MPF Research, 2017). Median single-family home rents are unaffordable to single workers earning the median wage, exceeding the 30% of income affordability benchmark by 17 to 24 percentage points.

Year	Median Monthly Earnings	Median Est. Rent for SF Home	Rent per Earnings	Median Est. Home Value
2016	\$2,701	\$1,468	54%	\$174,000
2015	\$2,683	\$1,394	52%	\$153,000
2014	\$2,685	\$1,352	50%	\$141,000
2013	\$2,648	\$1,312	50%	\$133,000
2012	\$2,639	\$1,253	47%	\$126,000
2011	\$2,644	\$1,240	47%	\$125,000
% Increase	2%	18%		39%

Figure 128: Median earnings and single-family housing costs, 2011 to 2016

Figure 129 displays median monthly 2016 earnings for people in Tarrant County's lowest wage occupations. People in these positions earn monthly median wages ranging from \$1,165 to \$3,015 per month (U.S. Census Bureau, 2016). Affordable rents, at no more than 30% of income spent on housing, for individuals in these jobs would range from \$350 to \$904 per month. None of these workers could afford to rent a single-family home with one income. These lower wage jobs employed more than 347,000 people in Tarrant County in 2016 (U.S. Census Bureau, 2016). The average multi-family apartment rent in the greater Fort Worth metropolitan area in the third quarter of 2017 was \$997 overall. Rents averaged \$627 per month for an efficiency (the smallest apartments) in east Fort Worth (MPF Research, 2017). Sales, arts and entertainment, fire fighters and construction workers could affordably rent an efficiency apartment in east Fort Worth. The remaining workers would have to spend from \$38 to \$277 per month more than they could afford (at 30% of income) to rent an efficiency on one wage.

Lower Wage Occupations	# Employed	Median Monthly Earnings	Affordable Monthly Rent @ 30% of Income	Housing Cost Gap @ \$627 per month rent
Arts, Entertainment, Recreation	15,089	\$3,015	\$904	\$277
Fire Fighters	10,349	\$2,528	\$758	\$131
Sales and related	105,979	\$2,508	\$752	\$125
Construction, Extraction	49,421	\$2,504	\$751	\$124
Healthcare Support	18,182	\$1,962	\$589	(\$38)
Material Moving	30,996	\$1,873	\$562	(\$65)
Cleaning, Maintenance	34,572	\$1,529	\$459	(\$168)
Personal Care	29,576	\$1,285	\$386	(\$241)
Food Prep, Serving	53,059	\$1,165	\$350	(\$277)

Figure 129: Comparison of average rent for efficiency apartment in east Fort Worth with rents affordable to lower-wage workers

Many jobs in the Fort Worth-Arlington metropolitan area do not pay enough to meet the needs of a very basic family budget. Figure 130 displays the expenses that would be required to meet the needs of different types of households at a modest level, the hourly wage required to meet those expenses and the percent of jobs in the Fort Worth-Arlington area that do not pay the required hourly wage (Center for Public Policy Priorities, 2017). One working adult with no children would require an annual income of at least \$23,755 per year to afford a one-bedroom apartment at HUD's Fair Market Rent (\$770 per month) and meet other basic needs (Center for Public Policy Priorities, 2017). Rent for this household is unaffordable at 39% of income. This scenario for family expenses excludes important budget categories that contribute to economic

opportunity such as emergency and retirement savings, education expense, child-care, recreation and consumer debt service. Twenty-five percent of Fort Worth households consist of one person (U.S. Census Bureau, 2016). Forty-percent of the jobs in the Fort Worth-Arlington area do not pay enough for a family with one adult and one child to afford these modest expenses.

Monthly household budget expense categories	1 Adult (working)	2 Adults (1 working)	1 Adult (working) 1 Child	2 Adults (working) 2 Children
Housing	\$770.00	\$770.00	\$973.00	\$973.00
Food	\$269.00	\$493.00	\$379.00	\$775.00
Child Care	\$ -	\$ -	\$572.00	\$930.00
Medical (ACA Marketplace)	\$146.00	\$258.00	\$309.00	\$528.00
Transportation (work-related, auto)	\$314.00	\$314.00	\$314.00	\$465.00
Other Necessities	\$252.00	\$432.00	\$380.00	\$518.00
Payroll Tax	\$134.00	\$173.00	\$224.00	\$320.00
Income Tax	\$95.00	\$54.00	-\$33.00	\$ -
Subtotal non-housing expense	\$1,210.00	\$1,724.00	\$2,145.00	\$3,536.00
Total Monthly Expense	\$1,980.00	\$2,494.00	\$3,118.00	\$4,509.00
Housing as % of total expense	39%	31%	31%	22%
Hourly Wage required per worker	\$11.00	\$14.00	\$18.00	\$13.00
Annual income	\$23,755	\$29,120	\$37,440	\$54,104
Percent of jobs below wage required	8%	13%	40%	9%

Figure 130: Household budget required to meet basic expenses, Fort Worth-Arlington, (CPPP 2017)

Sample comments received from public participation relating to jobs and housing:

- Takes 3 or 4 people together to rent a house; always in low-income areas.
- If you aren't a double-income family, teacher or above, you can't afford to buy – unless you buy in a poor area; real estate agents say can't find homes for \$150k and the competition [among buyers] drives the price up; haven't seen it like this in 20 years.
- I live in an area where many new apartments are being built but they are not affordable to low-income people. (CFW survey 16)
- It was hard for me to find an affordable place to live because most housing that wasn't in need of a lot of repair was too far from work, larger than I needed and/or too expensive.
- We need more affordable housing units in areas that offer good schools, good jobs and healthy retail—like the Alliance Corridor and thriving sections of west and southwest Fort Worth (CFW survey 142).
- Make companies that get tax breaks locate near existing housing locations (CFW Survey 150).
- In southwest Fort Worth, along the Chisholm Trail, massive residential development is starting. There is NO affordable housing, no senior housing. Could we consider that, when land use is granted, a certain percentage is mandatory for affordable housing? They [employers] use roads, fire, police, etc. And their service staff would live closer. (CFW Survey 240)
- Affordable housing for the working poor should be available throughout Fort Worth, in new communities, in upper income and middle-income neighborhoods, NOT just in poor neighborhoods. (CFW Survey 457)

FWHS employment programs

FWHS maintains a set of programs to assist clients in accessing employment opportunities (Fort Worth Housing Solutions, 2018):

Family Investment Center (FIC)

Fort Worth Housing Solutions (FWHS) Family Investment Center (FIC) is a “One Stop Center” providing services to meet the needs of public and assisted housing program participants. The FIC is located on the first floor of the FWHS Administrative Building where clients are assessed and receive referrals to services such as adult education and vocational training.

Neighborhood Network Center

The Neighborhood Network Center is an information technology center located in the FWHS Administration Building and provides access to computer training, internet-based job readiness and other programs that allow participants to obtain and/or enhance professional skills.

Employment Services

FWHS provides job development services to work with program participants and link them with area employers. Employment services include job readiness seminars, employment roundtables and quarterly job fairs.

Transportation

FWHS provides monthly bus passes to assist program participants with getting to and from interviews, appointments and employment.

Resident Contractors

FWHS makes a ‘good faith’ effort to employ, train and provide contract opportunities to eligible public and assisted housing program participants within its housing communities.

Many other providers throughout Tarrant County partner to offer programs that increase skills and help low-income residents achieve better paying jobs. United Way of Tarrant County partners with The Women’s Center and Tarrant County College to offer skills training and employment services to unemployed and underemployed residents, including those receiving public assistance (The Women’s Center, 2018; United Way of Tarrant County, 2018). Programs include healthcare, manufacturing, logistics, technology and project management.

Transportation

i

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

Low Transportation Cost Index (LTC)

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

As expected based on the index formulation, the LTC index shows an inversion where the protected classes outperform the white population in the FWHS jurisdiction. The LTC index sees similar values occurring across all groups in the FWHS jurisdiction (Figure 131) and the DFW region (Figure 132), but FWHS slightly outperforms the region. In the FWHS jurisdiction, almost 30% of white and 28% of Asian/PI residents live in census tracts with an index score of 39 or less; families with children (26%) have higher transportation cost index scores and appear to seek a similar residential pattern as the white and Asian/PI populations. Within the FWHS jurisdiction and NTRHA region, all protected groups have better scores than the white population, likely resulting from the greater proportion of the white population residing in the suburbs where transportation costs remain higher than in the primary urban cores (Dallas and Fort Worth).

LTC Index	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	0	0	0	0	0	0	0	0	0	0	0
10-19	1	0.2	0.5	0.1	0.3	0.1	0.1	0.1	0.1	0.2	0.3	0.2
20-29	15	9.6	2.3	2.2	6.6	1.4	1.9	2.2	1.5	3.3	7.3	4.2
30-39	41	19.8	15.1	10.5	20.7	7.4	7.9	10.5	9.3	12.7	18.6	13.9
40-49	54	18.1	17.2	13.4	16.4	10.3	12.9	14.1	11.8	13.3	17.1	16.0
50-59	67	17.8	19.7	25.4	15.4	21.1	22.4	20.9	23.3	21.8	18.9	22.1
60-69	78	17.8	22.7	31.7	18.5	30.8	28.3	26.9	34.2	29.3	21.0	24.9
70-79	38	10.0	12.7	11.3	13.4	16.2	15.9	14.7	13.9	12.7	10.7	11.5
80-89	23	6.4	8.7	5.0	8.0	11.8	9.6	9.7	5.7	6.4	5.4	7.0
90-99	2	0.3	1.1	0.3	0.5	0.9	0.9	0.9	0.2	0.3	0.5	0.3

Figure 131: Demographics of census tracts by Low Transportation Cost Index for protected classes in FWHS jurisdiction (HUD, LAI 2012 and U.S. 2010 Decennial Census)

LTC Index	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	14	1.6	0.2	0.3	0.1	0.9	1.0	1.0	0.3	0.2	0.8	2.0
10-19	30	3.3	0.6	0.8	0.3	1.5	2.0	1.8	0.6	0.6	1.8	3.2
20-29	107	12.7	4.5	3.8	5.9	4.5	4.9	6.1	2.5	3.9	8.9	8.4
30-39	187	20.6	10.3	9.3	13.7	9.3	10.1	11.6	7.2	9.4	16.9	15.7
40-49	194	15.9	16.9	12.2	14.5	9.9	11.3	12.8	10.5	11.2	15.9	14.6
50-59	195	12.7	15.3	17.8	12.7	13.4	14.1	14.0	16.3	15.3	14.6	14.5
60-69	245	13.3	20.0	23.3	16.8	20.5	20.2	19.4	23.6	21.3	16.8	18.7
70-79	194	10.1	15.5	15.7	15.4	17.8	15.6	14.5	17.1	16.3	12.2	12.3
80-89	156	7.0	12.0	10.8	14.7	14.9	13.9	12.6	13.6	13.9	8.6	8.1
90-99	70	2.8	4.8	6.0	5.9	7.3	6.9	6.3	8.3	7.9	3.5	2.6

Figure 132: Demographics of census tracts by Low Transportation Cost Index for protected classes in NTRHA region (HUD, LAI 2012 and U.S. 2010 Decennial Census)

Transit Trip Index (TT)

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

TT index scores appear very similar to the LCT index scores and similar scores occur across all groups within the FWHS jurisdiction. In the jurisdiction, almost 34% of the white population lives in census tracts with TT index scores of 39 or less and none of the protected classes have a significantly higher percentage (Figure 133). Within the NTRHA region (Figure 134), all protected groups have better scores than the white population. Almost 43% of the white population lives in census tracts with TT index scores of 39 or less. The FWHS area consistently outperforms the region across all groups because transit serves more of the jurisdiction than many other parts of the region. The stronger performance of protected classes likely results from the greater proportion of the white population residing in the suburbs, where transit service may not be available, rather than the primary urban cores (Dallas and Fort Worth).

TT Scores	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	0	0	0	0	0	0	0	0	0	0	0
10-19	2	0.9	0	0.1	0.2	0.1	0.3	0.3	0.1	0.2	0.4	0.5
20-29	17	8.3	1.8	2.5	3.7	2.5	2.9	3.3	1.3	2.2	6.1	4.9
30-39	61	24.7	14.3	13.4	20.1	11	12.7	14.3	9.5	14.2	20	18.3
40-49	134	39.6	46	43.9	43.1	39.2	40.9	41.3	44.2	43.8	42.5	42.3
50-59	80	19.8	28	33.4	23	35.1	32.4	29.4	37.7	31.4	24	27.3
60-69	25	6.8	9.8	6.7	9.9	12.1	10.8	11.4	7.2	8.1	6.9	6.7
70-79	0	0	0	0	0	0	0	0	0	0	0	0
80-89	0	0	0	0	0	0	0	0	0	0	0	0
90-99	0	0	0	0	0	0	0	0	0	0	0	0

Figure 133: Demographics of census tracts by Transit Trip Index for protected classes in FWHS jurisdiction (HUD, LAI 2012 and U.S. 2010 Decennial Census)

TT Index	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	40	4.2	0.6	1.0	0.5	2.0	2.3	2.2	0.7	0.8	2.3	4.0
10-19	20	2.0	0.4	0.6	0.6	0.8	1.0	1.2	0.4	0.5	1.2	1.5
20-29	136	15.6	4.4	5.6	3.3	7.4	8.0	8.9	3.4	4.0	10.3	12.2
30-39	228	20.8	15.6	13.8	15.9	12.1	12.9	14.3	11.3	12.9	18.5	17.2
40-49	450	31.5	37.6	34.4	35.3	28.7	30.3	31.2	32.5	32.8	34.6	32.7
50-59	315	16.8	24.4	27.6	26.9	27.2	25.2	23.7	30.2	28.1	21.0	21.6
60-69	145	6.7	12.2	11.3	13.2	15.0	13.6	12.7	13.7	13.5	8.9	8.3
70-79	57	2.3	4.7	5.7	4.0	6.5	6.5	5.8	7.8	7.2	3.2	2.5
80-89	1	0.0	0.1	0.1	0.2	0.2	0.2	0.1	0.1	0.2	0.1	0.0
90-99	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Figure 134: Demographics of census tracts in NTRHA region by Transit Trip Index for protected classes in NTRHA region (HUD, LAI 2012 and U.S. 2010 Decennial Census)

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

Low Transportation Cost Index

According to Figure 135, a large portion of the FWHS jurisdiction has LTC index scores from 40 to 80. Lowest scores (highest transportation cost) occur in north, west and south Tarrant County. The highest performing census tracts tend to concentrate west of I-35W and inside I-820 and through the mid-cities especially near freeways and between SH 183 and I-20.

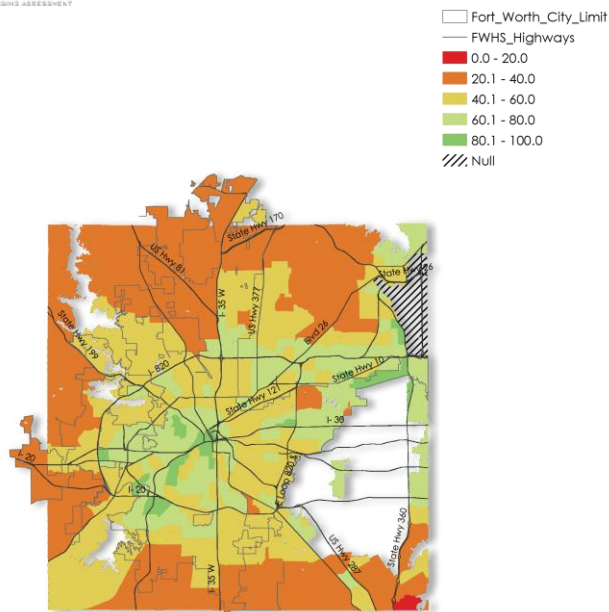


Figure 135: Low Transportation Cost Index Map of FWHS jurisdiction (HUD, LAI 2012)

At the regional level, Figure 136 shows that the LTC Index experiences clear trends. For this index, locations near freeways and the urban core appear to perform significantly better than rural areas. Within suburban areas, portions of Collin and Rockwall counties have low-scoring census tracts; however, most of the lower scoring areas occur beyond the most developed and populated areas of the region.

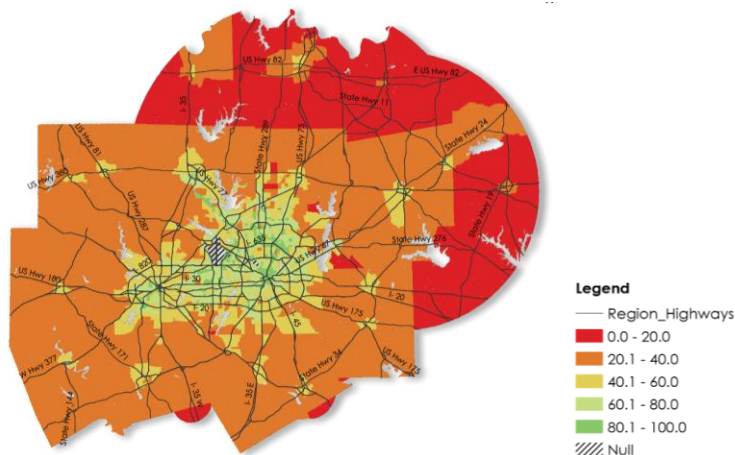


Figure 136: Low Transportation Cost Index map of the region (HUD, LAI 2012)

Transit Trip Index

According to Figure 137, most of the FWHS jurisdiction has rather moderate transit accessibility. The central areas of the FWHS jurisdiction tend to have slightly higher scores and suburban areas fare poorly outside of the mid-cities.

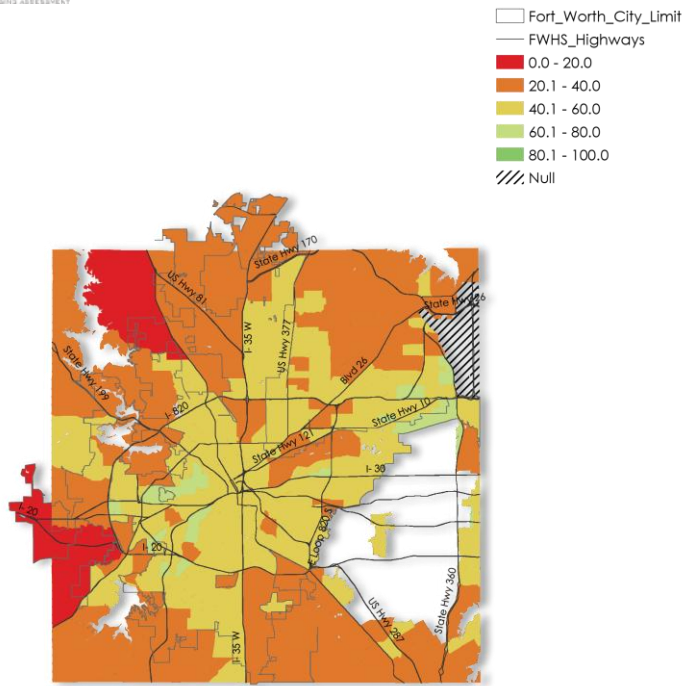


Figure 137: Transit Trip Index Map of FWHS jurisdiction (HUD, LAI 2012)

At the regional level, Figure 138 shows that the TT Index shows trends similar to the LTC index. For this index, locations near transit service and the urban core appear to have higher scores than rural areas. Suburban areas have low scores. This index produces some unusual results where some locations without transit service (i.e. Arlington) receive moderate scores.

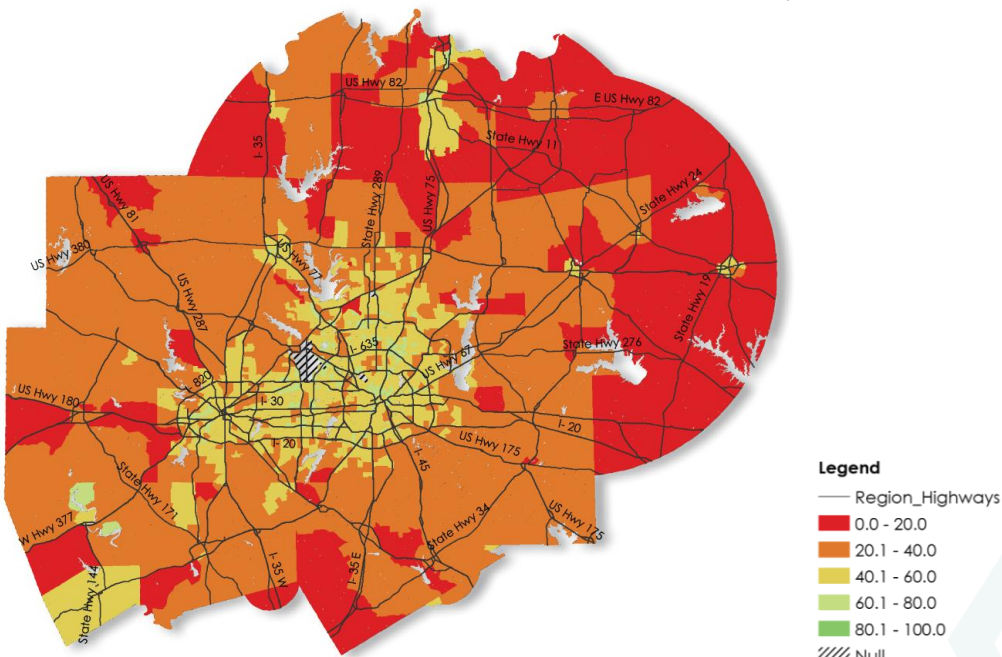


Figure 138: Transit Trip Index map of the region (HUD, LAI 2012)

iii

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

The study documented many comments concerning the availability, type, frequency and reliability of public transportation as a significant contributing factor to lack of access to opportunity. The CFW survey found that 51% (774 responses) of respondents identified inadequate public transportation service routes and location of stops as a major issue with public transportation (City of Fort Worth, 2017). Participants in public meetings and focus groups stated that public transportation did not adequately connect people to opportunities for employment.

Sample related comments from public engagement:

- Transportation is so convoluted – excessive need to switch buses.
- Nothing north of Town East Mall for transit service.
- We need buses to run on Sunday.
- The lack of efficient public transportation keeps lower income people from being able to find jobs outside their neighborhood (CFW survey 2).
- Affordable public transit and affordable housing go hand in hand; otherwise housing without transit becomes a prison for those who do not drive. (CFW survey 3).
- Many areas in Fort Worth do not have public transport, especially out to suburbs.
- Transportation is a key limiting factor to low-income housing opportunities (CFW survey 38).

According to its recent Master Plan, the Fort Worth Transportation Authority (now Trinity Metro) receives less funding than any large city in Texas at \$71 per capita per year (Fort Worth Transportation Authority, 2016). The City of Dallas, by comparison, funds transit at \$255 per capita per year. Fort Worth ranks 69 of 73 cities in the U.S. with over 250,000 residents for access to transit, transit performance and transit connection to jobs (Center for Neighborhood Technology, 2017). Support for public transit is difficult to create and sustain in Fort Worth as indicated by the failure of the recent proposal to apply 1 cent of a 3-cent proposed tax rate reduction to public transit during the 2017 City of Fort Worth budget process (Baker, 2017). The chairman of the Fort Worth Chamber of Commerce spoke in favor of the need to invest in transit to “move our commuters to their workplaces ...with a world-class system that includes ample roadways without congestion, numerous bus routes and convenient rail service” (Baker, 2017).

One factor driving low investment in Tarrant County public transit is the lack of participation by most municipalities. Tarrant County includes 41 cities but only the cities of Fort Worth and Blue Mound participate in Tarrant County's only transit system, Trinity Metro. Most of the nonparticipating cities are very small and have limited ability to raise tax revenues for transit. Figure 139 shows how city boundaries in Tarrant County overlap with and often lie within the boundaries of the City of Fort Worth, creating physical barriers to transit routes and contributing to extremely long transit times. For example, (e.g. 90 minutes and three buses to make a trip that would take 20 minutes by car) (Fort Worth Transportation Authority, 2018; Tarrant County, TX, 2018). Bus routes must avoid crossing the 39 nonparticipating cities, extending transit times. A recent innovative breakthrough in addressing this problem is an agreement between Trinity Metro and the tiny City of River Oaks (Dupler, 2017). Trinity Metro obtained permission to travel through the city, making stops and allowing a route to go directly from southwest Fort Worth to the north side (Fort Worth Transportation Authority, 2017). River Oaks is contributing a small

amount to the cost of fixed-route service plus a maximum of \$15,000 per year as a fee for service payment for on-call para-transit services (MITS) for persons with disabilities in River Oaks.

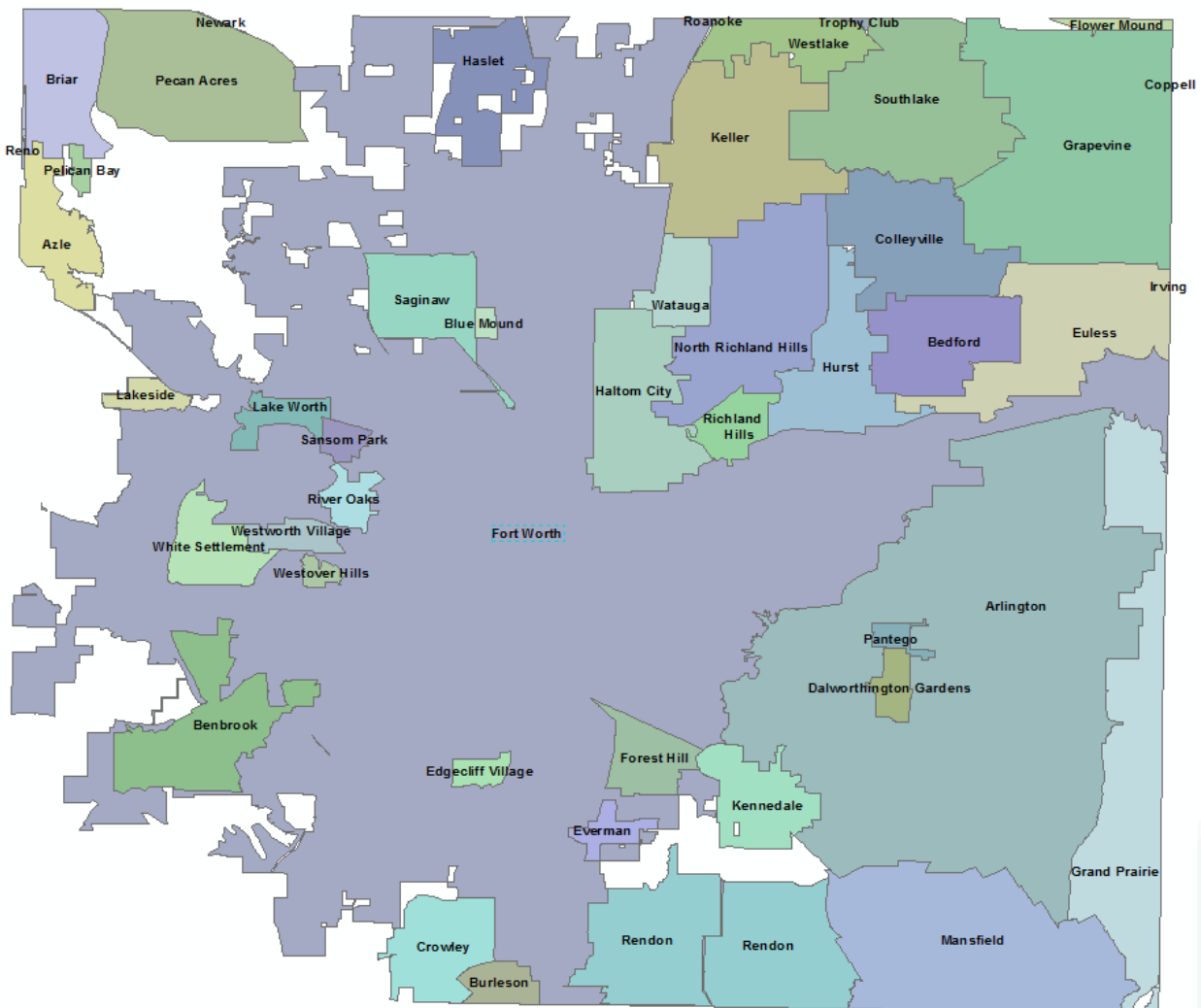


Figure 139: City boundaries within Tarrant County

Fort Worth low-income communities currently have the best public transit service available with the highest ridership routes (East Lancaster, East Rosedale, etc.). The T struggles to break from its image as the transportation provider of last resort for the poor and attract riders in higher income communities. Community opposition to public transit was evident in public meetings concerning the introduction of transit into far north Fort Worth (Dupler, 2017). The R/ECAP in the Las Vegas Trail apartment corridor in southwest Fort Worth has emerged with the strongest ridership in the City, overtaking the East Lancaster route through southeast Fort Worth. The T is currently planning a new, more direct route with fewer transfers to serve the southwest quadrant. The T has also prioritized funding to provide service later in the day and on weekends to meet the needs of workers, especially in lower paying service sector jobs. Bus service frequency slows significantly after 7 pm and stops altogether by 11 pm, making it nearly impossible for second-shift workers to use transit.

In August of 2018, the City of Fort Worth allocated \$450,000 to a transit study and \$550,000 to future pilot projects to address first- and last-mile transit solutions and the needs of under-served communities (City of Fort Worth, 2018).

Access to Low Poverty Neighborhoods

i

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

The Low Poverty (LP) index captures poverty in a given neighborhood. Its values are inverted and percentile ranked nationally with a range of possible values from zero to 100. A higher score indicates less exposure to poverty in a neighborhood. The index is based on the number of residents with incomes below the federal poverty level. In the FWHS jurisdiction, almost 49% of the Hispanic population and about 42% of the black population live in census tracts with LP index scores lower than 29 while about 13% of the Asian/PI and white populations live in the same census tracts (Figure 140). At the same time, about 33% of the Asian/PI population and over 38% of the white population live in census tracts with LP index scores greater than 80 while only 14.1% of the black population and 13% of the Hispanic population live in similar census tracts. Disparities between different races and ethnicities in the jurisdiction of FWHS persist at the regional level (Figure 141). Census tracts in the NTRHA region with LP index scores lower than 29 contain over 50% of the Hispanic population, over 44% of the black population and about 13% of the Asian/PI and white populations. Census tracts in the NTRHA region with LP index scores greater than 80 contain over 41% of the Asian/PI population, over 34% of the white population and only 15% of the black and 11% of the Hispanic populations. Families with children appear to be slightly more disadvantaged in the FWHS jurisdiction with 27% in census tracts with LP index scores lower than 29 and about 25% living in census tracts with similar scores in the region.

For the other protected groups, the FWHS jurisdiction and the DFW region have similar trends of disadvantage. In the FWHS jurisdiction and overall region, over 50% of residents with incomes at or below 30% of area median income (ami30) live in census tracts with LP index scores lower than 29. The FWHS jurisdiction and overall region both have only 9% of the ami30 population living in census tracts with LP index scores greater than 80. In the FWHS jurisdiction and the NTRHA region, about 43% of the residents with incomes at or below 50% of the area median income (ami50) live in census tracts with LP index scores less than 29 and 12% live in census tracts with LP index scores greater than 80. The FWHS jurisdiction sees residents with incomes at or below 80% of the area median income (ami80) population slightly less concentrated than the overall region. About 31% of the ami80 population lives in census tracts with LP index scores lower than 29 while in the region, this proportion reaches 34%.

The limited English proficiency (LEP) population appears very concentrated in locations of poverty in both the FWHS jurisdiction and the overall region. Over 53% of the LEP population lives in census tracts with LP index scores lower than 29 and about 10% live in census tracts with LP index scores greater than 80. In the FWHS jurisdiction, the foreign-born concentration appears slightly more concentrated in high poverty locations than the overall region. Almost 44% of the foreign-born population inside the FWHS jurisdiction lives in census tracts with LP index scores lower than 29 while over 42% of the foreign-born population lives in census tracts with similar scores region-wide. In the FWHS jurisdiction, about 16% of the foreign-born population lives in census tracts with LP index scores greater than 80 while regionally, 18% of the foreign-born population lives in census tracts with similar scores. In both the FWHS jurisdiction and the region, about 33% of residents with disabilities live in census tracts with poverty index scores lower than 29. In the FWHS jurisdiction, over 21% of residents with disabilities live in census tracts with poverty index scores greater than 80 and regionally, only 19% live in census tracts similar scores.

LP Index	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	39	2.5	19.2	20.7	3.4	23.2	16.2	9.5	23.9	17.9	8.8	12.1
10-19	33	4.8	12.8	16.3	4.2	16.5	14.9	11.3	17.8	14.1	8.5	11.7
20-29	24	5.5	9.6	11.9	5.9	11.4	11.4	10.2	11.8	11.5	7.8	8.7
30-39	23	6.2	6.8	7.3	5.1	7.8	10.2	8.5	8	6.9	6.1	7.4
40-49	33	9.1	12.3	8.8	10.9	11.3	11.4	11.9	8.5	8.9	9.5	10.8
50-59	25	7.7	5.5	5.4	6.3	6.3	8.2	8.5	4.7	5.7	6.4	6.9
60-69	28	10.1	9.1	6	12.4	7.1	6.7	9.6	5.8	7.5	9	8.5
70-79	34	15.8	10.5	10.6	18.5	7.5	8.8	12	9.6	11.3	14.1	12.4
80-89	36	17.2	7.7	7	16.3	5.3	6.8	9.8	5.3	7.5	14.1	9.9
90-99	44	21	6.4	6	17	3.6	5.4	8.7	4.7	8.6	15.7	11.5

Figure 140: Demographics of census tracts in FWHS jurisdiction by Low Poverty index scores for protected classes (HUD, ACS 2013 and U.S. 2010 Decennial Census)

LP Index	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	126	1.9	16.5	14.6	3.0	18.5	12.4	8.0	16.5	12.6	6.9	9.0
10-20	167	5.5	16.0	22.3	5.0	20.1	18.4	14.6	24.3	18.3	11.5	13.3
20-29	122	6.0	11.8	13.4	5.4	12.2	12.5	11.2	13.1	11.6	8.5	10.5
30-39	135	9.3	10.0	10.6	6.4	10.9	12.3	11.2	10.2	9.6	9.0	10.9
40-49	119	8.9	8.0	8.4	5.6	8.6	9.3	9.9	7.5	7.2	8.1	9.8
50-59	109	9.1	7.2	5.9	6.0	7.2	8.0	9.1	5.3	5.9	7.3	8.7
60-69	127	11.5	7.1	6.4	12.1	7.4	8.2	9.6	6.1	7.9	9.4	9.4
70-79	126	13.2	8.3	6.9	14.7	6.3	7.0	9.1	6.1	8.1	11.1	9.5
80-89	157	15.5	7.4	5.9	18.7	5.3	6.5	9.0	5.6	8.9	12.6	9.2
90-99	205	18.9	7.7	5.6	23.1	3.6	5.3	8.3	5.2	9.9	15.5	9.7

Figure 141: Demographics of census tracts in NTRHA region by Low Poverty index scores for protected classes (HUD, ACS 2013 and U.S. 2010 Decennial Census)

ii.

For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region

According to Figure 142, the FWHS jurisdiction has numerous locations with low scores on the low poverty index (0.0 to 20.0). The locations with low and very low index scores occur primarily inside I-820; however, the locations with low scores also include the Everman area, east Fort Worth between I-30 and I-20 and isolated locations in the mid-cities along SH 10. The high-scoring census tracts (indicating lower poverty) concentrate in the northern and western areas of the FWHS jurisdiction. This overall pattern follows the white vs. non-white segregation pattern, which indicates that poverty rates appear highly correlated with non-white segregation levels in the FWHS jurisdiction.

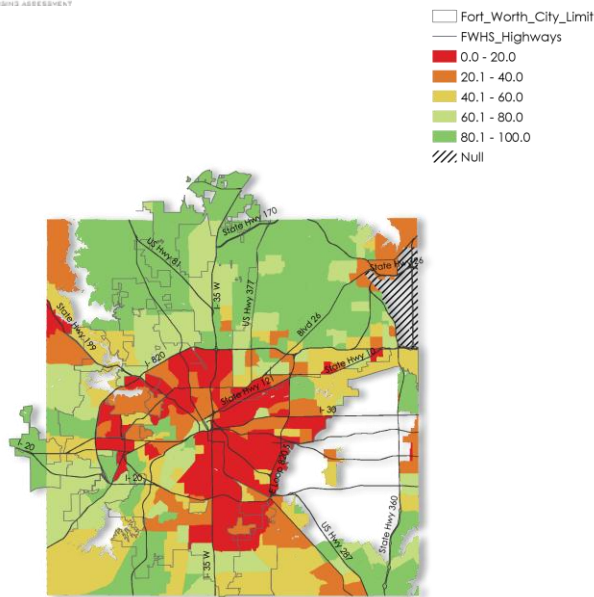


Figure 142: Low Poverty Index Map of FWHS jurisdiction (HUD, ACS 2013)

Regionally, Figure 143 shows that the LP Index has clear trends. The LP indices for Dallas and Fort Worth show that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have low scores. The suburban areas within the NCTCOG planning area have the highest LP scores; however, limited concentrations of low-scoring census tracts occur in most suburbs. Rural index scores appear to vary more for this index than other indices; exurban areas appear to perform above average. Rural areas east and southeast of Dallas appear to have lower scores than other rural areas.

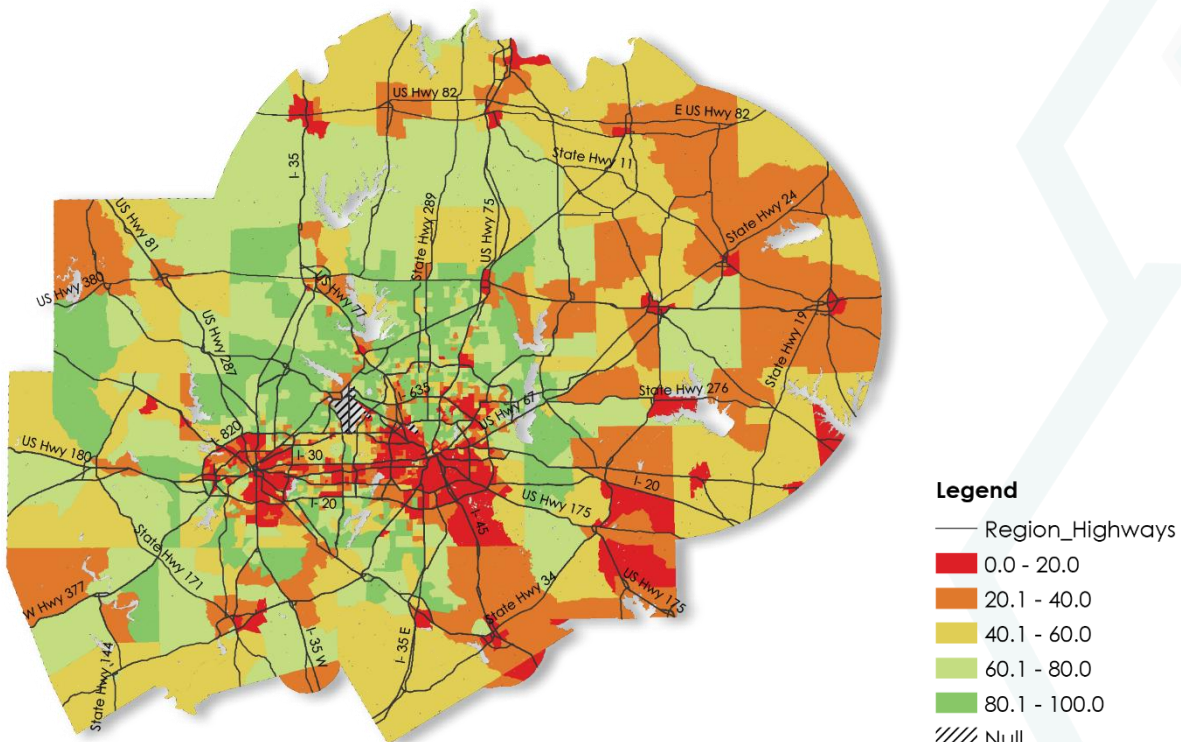


Figure 143: Low Poverty Index map of the region

iii

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




















FWHS implemented the HUD Small Area Fair Market Rent program (SAFMR) beginning April 1, 2018. HUD previously set one Fair Market Rent (FMR) amount for each type of apartment for all of Fort Worth and Arlington (U.S. Department of Housing and Urban Development, 2017). Housing authorities use HUD FMR guidelines to set payment standards that limit the amount of subsidy provided for a particular rental in a particular location. The SAFMR program sets a fair market rent for each zip code for each apartment type (number of bedrooms) (U.S. Department of Housing and Urban Development, 2018). For currently assisted households, housing authority payment standards change (up or down) at annual renewals to the new 2018 SAFMRs beginning April 1, 2018¹⁰. SAFMRs help households use vouchers in areas of higher opportunity and lower poverty and reduce voucher concentration in high-poverty areas by more closely reflecting rental market prices in different locations within a community (National Low Income Housing Coalition, 2017). Figure 144 compares average 2018 SAFMRs with 2017 FMRs. Rents offered to landlords may increase in 81 zip codes to better compete with the rental market in higher cost areas, giving voucher holders more access to these areas. The average 2018 SAFMR (of 103 zip codes in the jurisdiction) is 11% higher than the 2017 single community-wide FMR for efficiency apartments (zero bedrooms) and one-bedroom apartments. Twenty-two zip codes have 2018 SAFMRs that are less than the 2017 FMR. Eventually these rents may be reduced. For new housing assistance contracts, the decreases went into effect on April 1, 2018 and eventually, for households receiving assistance prior to April 1, 2018, the subsidy must be reduced based on the lower 108 SAFMR payment standard. HUD permits housing authorities to maintain existing payment standards in zip codes where FMRs decreased up to the second annual voucher renewal period and FWHS has opted to do so (U.S. Department of Housing and Urban Development, 2016). Average payment standard increases are 12% for efficiencies and 13% for one-bedroom apartments when decreasing payment standard zip codes continue at 2017 rates (instead of decreasing them).

FWHS HUD FMRs	0 BDRM	1 BDRM	2 BDRM	3 BDRM	4 BDRM
2017 FMR	\$671	\$770	\$973	\$1,338	\$1,702
Average 2018 SAFMR	\$748	\$856	\$1,074	\$1,475	\$1,880
- Increase over 2017	11%	11%	10%	10%	10%
Average 2018 SAFMR w/out decreases	\$755	\$865	\$1,087	\$1,493	\$1,903
- Increase over 2017	13%	12%	12%	12%	12%
Median SAFMR	\$738	\$840	\$1,050	\$1,450	\$1,850
Minimum SAFMR	\$590	\$670	\$840	\$1,160	\$1,480
Maximum SAFMR	\$990	\$1,188	\$1,458	\$1,962	\$2,502

Figure 144: Impact of Small Area Fair Market Rents on FWHS voucher costs

The highest 20% of FWHS SAFMR payment standards are located in Figure 145. Eleven cities have higher payment standards, including many north of the central City near the Alliance Airport business park, an area of strong job growth. Only two locations are within the central City, including the central business district and the Naval Air Station adjacent to Lockheed Martin in west Fort Worth.

¹⁰ Payment standards reflect how rent subsidy is calculated. The actual rents approved for a rental unit must be reasonable based on comparable unassisted units in the area and utilities that are provided (FWHS, 2018).

-  75022
-  75028
-  76034
-  76123
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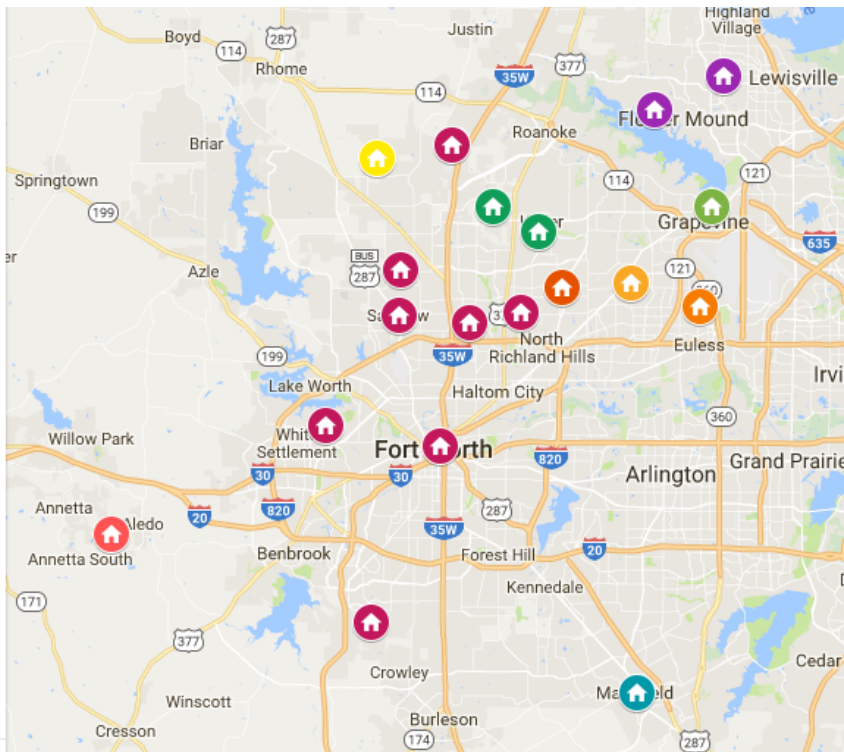


Figure 145: Locations of 20 highest SAFMRs – FWHS

The SAFMR program attempts to make rental properties in higher priced communities accessible to voucher holders, increasing choice and access to opportunity. FWHS has set its payment standards to support opportunity to higher priced properties while offering stability to voucher holders in areas where SAFMRs may be lower than the previous FMR payment standard. HUD permits payment standards to be set between 90% and 110% of the SAFMR. FWHS has chosen to set payment standards at 90% of SAFMRs for zip codes where the SAFMR exceeds the previous payment standard, except where the previous payment standard was higher than the SAFMR standard (Mitchell, 2018). No payment standards will be lower than previous payment standards. Payment standards are set at 100% for those zip codes where the SAFMR is lower than the previous payment standard. MPF Research conducts quarterly tests of residential markets for the multi-family housing industry, providing information on current supply and demand factors such as average rents. Figure 146 compares the 20 highest HUD SAFMRs for a one-bedroom apartment with the MPF third-quarter 2017 assessment of average one-bedroom rents in the same zip codes (MPF Research, 2017). SAFMR rents exceed the average market rents in the majority of these zip codes, indicating that it is very likely that the SAFMR will provide access to these low-poverty communities for HCV users, if landlords are willing to accept subsidies as rent. MPF rent averages fall short of the HUD SAFMR in Colleyville, Keller, Grapevine and north and near southwest Fort Worth (Intown/University). SAFMR payment standards may not be high enough in these areas to attract landlords.

Zip Code	City	Avg. Rent 1 BDRM (3Q 2017 MPF)	SAFMR 1 BDRM (HUD 2018)	Variance
76123	Fort Worth (South)	\$703	\$1,134	\$431
76127	Naval Air Station	\$796	\$1,098	\$302
76008	Aledo	\$829	\$1,080	\$251
75022	Flower Mound	\$990	\$1,188	\$198
75028	Flower Mound	\$990	\$1,188	\$198
76148	Fort Worth (Northeast)	\$933	\$1,035	\$102
76131	Fort Worth (North)	\$1,059	\$1,134	\$75
76244	Keller	\$1,059	\$1,134	\$75
76052	Haslet	\$1,059	\$1,125	\$66
76039	Euless	\$901	\$963	\$62
76063	Mansfield	\$912	\$963	\$51
76182	North Richland Hills	\$933	\$981	\$48
76137	Fort Worth (Northeast)	\$933	\$972	\$39
76177	Fort Worth (Northeast)	\$1,059	\$1,080	\$21
76034	Colleyville	\$1,166	\$1,134	-\$32
76179	Fort Worth (North)	\$1,059	\$981	-\$78
76248	Keller	\$1,059	\$981	-\$78
76102	Fort Worth (Intown/University)	\$1,155	\$1,008	-\$147
76051	Grapevine	\$1,166	\$972	-\$194

Figure 146: Highest 2018 HUD SAFMRs with Avg. Mkt. Rent (MPF 3Q 2017)

FWHS HCVs are in use in 51 of the 103 zip codes in the FWHS jurisdiction, approximately half. Fifty-five percent of the highest rent zip codes (top 51) currently include consumers using HCVs, indicating that FWHS HCV users already have a presence in many lower poverty, higher rent communities. Approximately 45% of the lowest rent zip codes (bottom 51) currently have HCVs.

FWHS has developed a plan to make its clients aware of the opportunities presented by the new SAFMRs to move to higher opportunity areas, including staff training, letters to all voucher holders and briefings for families to address questions. Effective October 1, 2018, FWHS increases its payment standards to 110% of HUD's 2019 SAFMR payment standards to increase access to quality housing in the current housing market (HUD USER, 2018; FWHS, 2018). Figure 147 shows the change in median payment standards (among different zip codes) from 2018 to 2019 fiscal years. The median payment standard for efficiency and one bedroom units increases by 13%.

Number of Bedrooms	0	1	2	3	4	5	6
2018 Median PS	\$738	\$840	\$1050	\$1450	\$1850	\$2128	\$2434
2019 Median PS	\$836	\$946	\$1,177	\$1,612	\$2,041	\$2,035	\$2,341
Change 2018 to 2019	13%	13%	12%	11%	10%	-4%	-4%

Figure 147: FWHS median payment standards for fiscal years 2018 and 2019 by number of bedrooms

Access to Environmentally Healthy Neighborhoods

i.

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

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

All of the FWHS jurisdiction census tracts (Figure 148) receive scores below half of the census tracts in the United States (scores zero to 49). While none of the census tracts in the jurisdiction

has higher scores, the protected classes have larger proportions of their populations living in the very low performing census tracts. About 16% of the white and black populations and 11% of the Asian/PI population live in census tracts with EH scores lower than 19 while almost a third of the Hispanic population lives in these census tracts. The remaining vulnerable groups all fare more poorly than the white population. In the FWHS jurisdiction, about 23% of residents with incomes below 50% of area median income (AMI) live in census tracts with EH scores lower than 19; about 21% of residents with incomes from 50% to 80% AMI live in the same census tracts. The Limited English Proficiency (30%) and foreign-born populations (27%) fare even worse in these census tracts. About 21% of families with children and disabled residents live in these very low performing census tracts.

The overall region (Figure 149) has less of its population living in census tracts with low EH scores than FWHS. Census tracts in the NTRHA region with EH scores lower than 19 contain 15% of the Hispanic population, almost 16% of the black population and about 8% of the white and Asian/PI populations. For these groups, only black residents at the regional level fare worse than the same populations inside the FWHS jurisdiction. This trend holds for all of the other protected classes. Census tracts in the NTRHA region with EH scores greater than 60 contain almost 14% of the white population and about 3% of the Hispanic, black and Asian/PI populations. Families with children appear slightly worse off at the regional level than FWHS. Overall, they appear better off than all other protected classes at the regional level and not much worse than the white population. The other groups (low-income, LEP, foreign-born and persons with disabilities) experience population distributions with respect to the EH index similar to the black and Hispanic populations at the regional level. No census tracts in the region have EH scores above 79.

EH Scores	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% income < 30% AMI	% income 30-49% AMI	% income 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	5	2.8	1.4	2.0	1.1	2.7	1.8	2.0	1.1	1.1	2.6	3.4
10-19	39	13.6	14.2	29.8	10.0	20.5	21.0	19.4	28.5	26.3	18.0	18.1
20-29	115	49.0	44.2	44.5	50.0	48.0	51.4	50.7	47.3	45.1	46.1	49.6
30-39	58	27.6	36.6	20.4	31.9	25.9	22.4	24.9	19.9	23.6	27.3	25.5
40-49	9	6.9	3.6	3.3	7.0	3.0	3.4	3.0	3.1	3.9	6.1	3.5

Figure 148: FWHS jurisdiction demographics by Environmental Hazard Index scores (HUD, NATA 2011, 2010 Census)

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

Figure 149: Environmental Health Index of protected groups in NTRHA region, (HUD, NATA 2011, 2010 Census)

ii.

For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

According to Figure 150 and as previously acknowledged, all scores for the EH Index in the FWHS jurisdiction range from zero to 50. Very low scoring census tracts occur north of downtown Fort Worth, north of DFW airport and adjacent to major highways. Moderate EH scores occur in less densely developed areas of the FWHS jurisdiction.

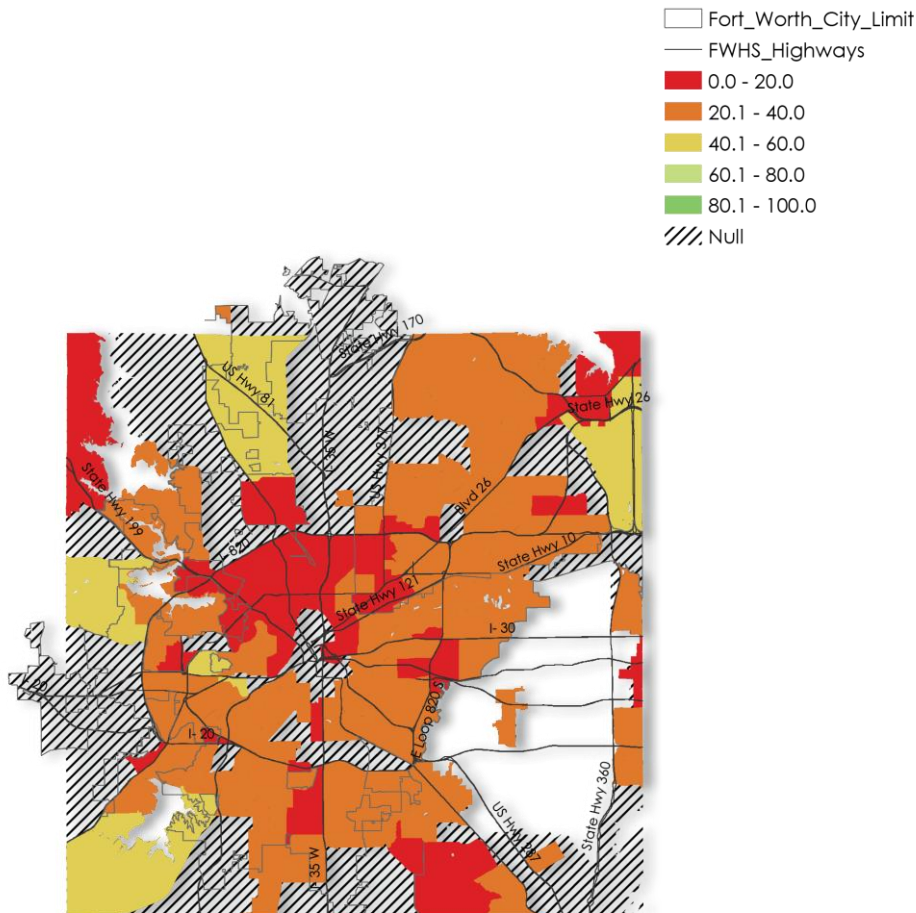


Figure 150: Environmental Health Index Map FWHS jurisdiction (HUD, NATA 2011)

At the regional level, the Environmental Health Index experiences clear trends (Figure 151). First, the analysis is incomplete because many of the census tracts lack data. Because these scores relate to air pollution and the DFW region remains in nonattainment for ozone standards, the census tracts in the urban cores and suburbs have low scores. Only rural areas receive higher scores and none of the census tracts has scores of 80 or above.

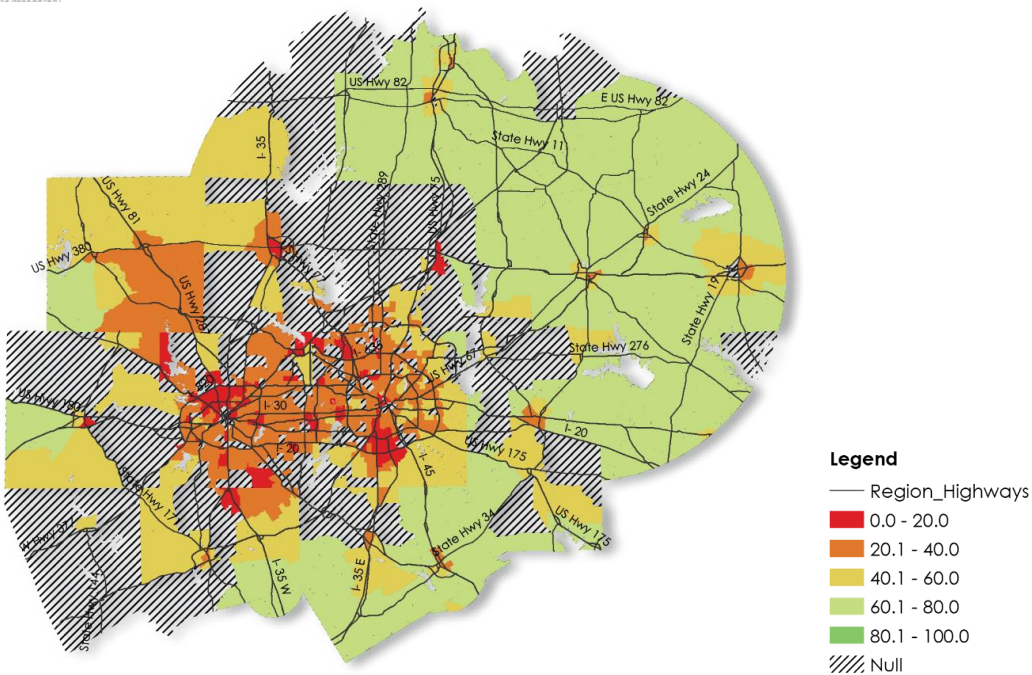


Figure 151: Environmental Health index map of the region (HUD, NATA 2011)

iii

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

Mobility 2040, a regional transportation plan, includes an environmental justice assessment of the impact of building recommended transportation facilities (North Central Texas Council of Governments, 2018). The assessment indicates that access to jobs via public transit will be significantly improved for both protected and non-protected groups if projects are built as planned. Congestion will increase but far less so if the mobility plan is built as recommended. Neighborhoods in the DFW region with the lowest scores on the environmental hazard index are predominantly located adjacent to major highways and heavy traffic areas, with automobile transportation contributing to poor air quality. Reductions in congestion can improve air quality. North Texas has a higher prevalence of adult asthma (7.9%) than Texas as a whole (6.8%) (Texas Department of State Health Services, 2012). The entire DFW area is an ozone nonattainment area, failing to meet federal healthy air quality standards for the presence of ozone (U.S. EPA Office of Air and Radiation, 2018). The City of Fort Worth maintains programs to promote improved air quality, including a pollution hotline, Partner of the Year and Business Smart programs (City of Fort Worth, 2018).

The City of Fort Worth maintains programs to address land, storm water and other environmental quality issues and is developing its first Environmental Master Plan (City of Fort Worth, 2018). Figure 152 displays the locations of Brownfield properties in Fort Worth, along with other EPA designated sites (U.S. Environmental Protection Agency, 2018). Eighty-six active brownfield sites are shown in various stages of grant-making on the EPA website in Fort Worth and its neighboring cities (excluding Arlington), half of which have accomplishments counted by the EPA. Nearly half of the sites listed are for assessment grants for hazardous or petroleum waste and redevelopment. Nearly half are for grant types to be announced and only one grant is for clean-up in the Stop-Six neighborhood at the Tarrant County College Opportunity Center. The median 2010 poverty rate for all brownfield sites listed is 31% for neighborhoods within a one-mile radius of each site. These properties were located in areas with a median of 56% of residents with annual incomes

equal to two times the federal poverty rate and a median of 11% vacant homes. The City of Fort Worth maintains a Brownfields Redevelopment Program to encourage redevelopment of troubled properties in distressed areas. Fort Worth also manages a low-interest loan program to encourage developers to tackle properties requiring environmental clean-up (City of Fort Worth, 2018).

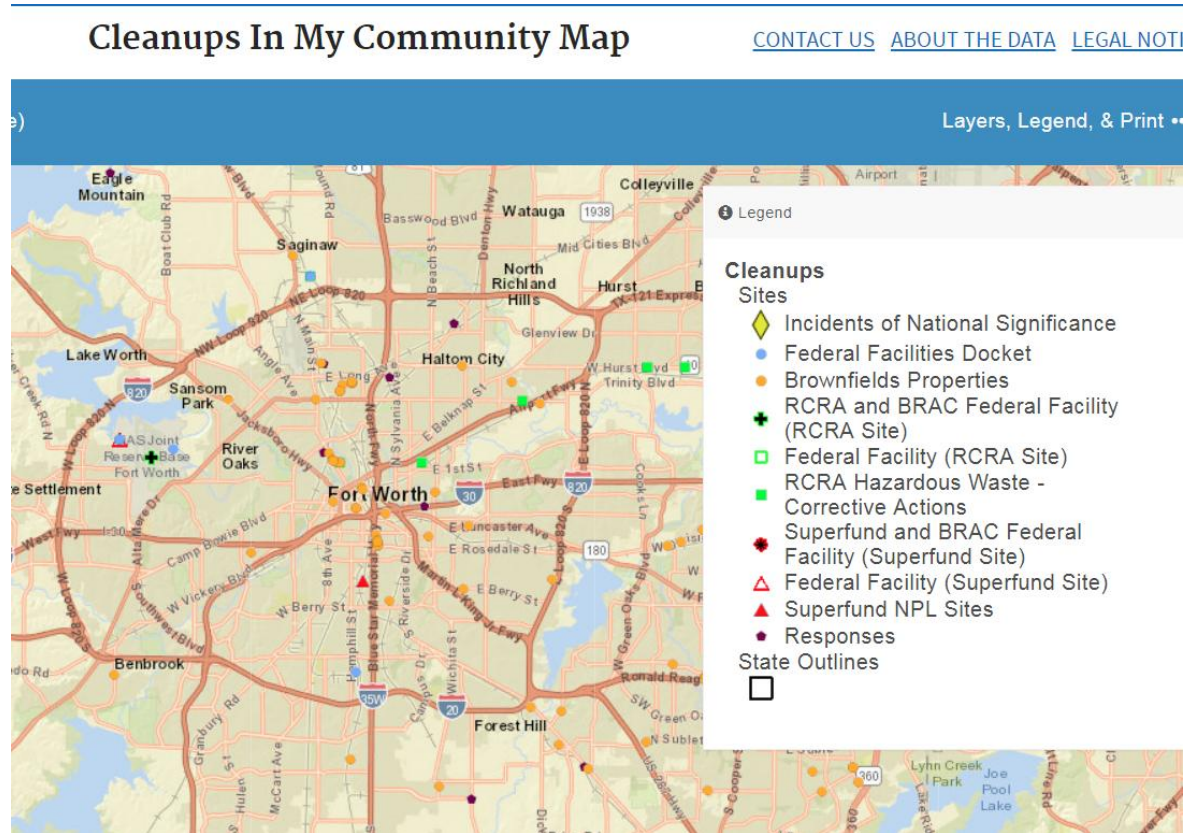


Figure 152: Brownfields property locations in Fort Worth, (EPA 2018)

f. Patterns in Disparities in Access to Opportunities

i

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

Figure 153 summarizes HUD's opportunity index scores (discussed individually above) for sub-groups by race, ethnicity and poverty status for the City of Fort Worth and the DFW region. Index values range from zero (highly unfavorable) to 100 (most favorable) in comparison with residents of other locations.

- Low Poverty (LP) index scores (30.72, 29.67) and School Proficiency (SP) scores (29.73, 35.9) for black and Hispanic residents of Fort Worth are significantly lower than for other races and ethnicities. This condition is more severe for black and Hispanic residents with incomes below the federal poverty line (LP, 17.26, 19.12 and SP, 22.8, 31.17). These patterns are consistent with segregation of low-income black and Hispanic residents in R/ECAPs. Black and Hispanic scores for LP and SP in Fort Worth are lower than comparable scores for black and Hispanic residents in the region.

- In Fort Worth and the DFW region, the white population living below the federal poverty line has higher SP, Labor Market Engagement (LME) and LP index scores than the overall black and Hispanic populations. SP scores are significantly lower in Fort Worth for all races and ethnicities than in the region. Fort Worth also performs more poorly than the region for all races and ethnicities on the LP Index.
- Only white and Asian or Pacific Islander residents have scores above 50 for LP, SP and LME. Asian or Pacific Islander residents experience lower segregation than other groups.
- Transportation indices (Transit and Low Transportation Cost) are similar for all population groups. Transit (TT) index scores are low to moderate for all races and ethnicities (45 to 48) and slightly lower in Fort Worth than the region except for white and Native American populations.
- Families living below the poverty line have significantly lower index scores for LP, SP and LME than does the general population in Fort Worth.
- All races and ethnicities in Fort Worth, above and below the poverty line, live in areas with very low scores on Environmental Health, reflecting low regional air quality. Fort Worth scores fall below overall regional scores.

(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	61.02	54.19	65.09	46.18	54.59	49.42	23.51
Black, Non-Hispanic	30.72	29.73	38.06	47.78	58.59	47.15	23.99
Hispanic	29.67	35.90	36.33	48.33	57.93	45.93	21.38
Asian or Pacific Islander, Non-Hispanic	58.64	50.01	63.80	47.25	55.00	44.62	25.08
Native American, Non-Hispanic	51.13	47.68	54.37	45.84	54.75	47.55	22.75
Population below federal poverty line							
White, Non-Hispanic	39.18	45.05	49.08	49.88	63.77	54.43	22.14
Black, Non-Hispanic	17.26	22.80	25.16	49.04	62.06	48.93	23.65
Hispanic	19.12	31.17	28.63	49.84	60.81	48.19	20.98
Asian or Pacific Islander, Non-Hispanic	47.58	50.76	58.75	50.51	63.75	55.27	24.07
Native American, Non-Hispanic	26.37	43.30	40.20	47.49	61.85	52.04	20.18
(Dallas-Fort Worth-Arlington, TX) Region							
Total Population							
White, Non-Hispanic	64.62	63.23	67.57	42.14	51.91	50.10	35.85
Black, Non-Hispanic	40.78	39.20	47.59	48.17	60.55	44.28	31.30
Hispanic	37.25	42.48	45.75	48.70	61.74	47.18	30.71
Asian or Pacific Islander, Non-Hispanic	66.83	65.98	74.36	48.94	60.65	48.35	34.37
Native American, Non-Hispanic	56.41	56.43	59.73	43.05	53.41	49.43	35.20
Population below federal poverty line							
White, Non-Hispanic	48.24	52.31	53.86	44.63	57.02	52.01	33.53
Black, Non-Hispanic	24.15	30.48	33.43	51.04	65.56	45.27	28.14
Hispanic	25.63	37.13	38.58	51.35	65.99	48.95	28.77
Asian or Pacific Islander, Non-Hispanic	51.26	54.40	60.78	52.22	67.80	51.48	30.33
Native American, Non-Hispanic	35.38	43.07	43.31	46.44	60.60	55.88	30.46

Figure 153: Opportunity Indicators, by Race/Ethnicity in Fort Worth and the Region (HUD AFH Table 12)

ii

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

North and northeast Tarrant County consistently receive higher scores on HUD's opportunity indices. Including the School Proficiency index, the areas with the strongest aggregate access to opportunities occur in west and north Plano. In Fort Worth, low access to opportunity across multiple indicators occurs inside I-820. Many of the areas with the lowest opportunity indicator scores include R/ECAPS, particularly, northwest and southeast of downtown Fort Worth. These areas include both blacks and Hispanics with the Hispanic population more prevalent north of downtown and the black population southeast of downtown.

Spatial concentrations of Hispanic and black residents in Fort Worth, especially inside I-820, coincide strongly with low scores on the LME and LP indices. While some suburban and rural

census tracts have low SP scores, low school proficiency tends to align closely with the distribution of the black population.

At the regional level, suburbs outperform Dallas and Fort Worth across multiple indicators. However, most suburbs have isolated pockets of lower performance for LME and LP indices. The SP index does not provide a clear recommendation for opportunity because not all suburbs have strong schools that outperform Dallas and Fort Worth ISD schools. Poor families tend to be more concentrated in higher poverty communities with lower performing schools. Spatial patterns of regional segregation and R/ECAP locations match locations with lower SP, LME and LP index scores.

Additional Information

a.

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

Women

In 2014, the Dallas Women's Foundation sponsored a report on Economic Issues for Women in Texas: Dallas Metro Area, including Collin, Dallas, Denton, Ellis, Hunt, Kaufman and Rockwall counties (Texas Women's Foundation, 2014). This report found that women are at a significant disadvantage in relation to access to housing and economic opportunity. Women in the greater Dallas metropolitan area:

- Earn 85 cents for every dollar earned by a man;
- Earn less than a man when employed in the same job sector;
- Are more likely to live in poverty than men.

Single mothers with children are significantly more disadvantaged. Single mothers with children:

- Are more likely to spend over 30% of their income on housing and utilities than single fathers or two-parent families
- Spend 22% of income on child care

Women make a substantial or primary contribution to household income in nearly two-thirds of Texas families (Center for Public Policy Priorities, 2017).

Children

The Center for Transforming Lives (CTL) is a Tarrant County nonprofit organization providing services to extremely low-income children with a core mission to serve families struggling with homelessness (Center for Transforming Lives, 2017). CTL originated an initiative to identify and address the problems facing homeless children under age 6 in 2016. The initiative included focus groups of families experiencing homelessness and service providers and resulted in a report and ongoing committees developing action plans (Center for Transforming Lives, 2017). The report included the following findings:

- Unsheltered children under the age of 15 first appeared in the annual Point-in-Time count of homelessness in 2017.
- An increasing number of children are being born into homelessness. Homeless women face barriers to effective contraception and other health-care around and during pregnancy.
- Homeless children are often not enrolled in early child-care programs due to lack of transportation and other barriers.
- Single parents working in low-wage jobs do not make enough income to afford rent, transportation and childcare, leading to housing instability.

- Children and youth are under-counted during the annual Point-in-Time count of homelessness because the PIT fails to include children living temporarily in motels or doubled up with other families and who move with great frequency.

Service providers participating in the Center for Transforming Lives report stated that childcare, job training and housing were the greatest needs facing homeless families followed closely by affordable transportation. Shelters were not seen as an effective housing solution for families due to lack of safety on East Lancaster where most shelters are located, requirements that family members be separated and shelter conditions. Homeless persons participating in focus groups identified childcare, housing and job training as their greatest needs followed by transportation.

Figure 154 displays information from the Texas state Public Education Information Management System reporting the number of students homeless in Tarrant County school districts (Center for Transforming Lives, 2017). Over 7,000 students were homeless in 2015, an increase of 13% from 2013.

	2014-2015						2013-14	2012-13
DISTRICT NAME	Enrollment	Economically Disadvantaged	% Econ. Dis.	Total Homeless	Percent Homeless	% Change 2012 to 2015	Total Homeless	Total Homeless
AZLE ISD	6,701	2,916	44%	349	5.21%	11%	372	315
EVERMAN ISD	6,198	4,591	74%	311	5.02%	-18%	307	378
HURST-EULESS-BEDFORD ISD	24,267	11,683	48%	772	3.18%	-17%	796	928
ARLINGTON ISD	70,313	43,522	62%	2,180	3.10%	17%	1,688	1,862
CHAPEL HILL ACADEMY-Charter School	533	319	60%	15	2.81%	-38%	15	24
FORT WORTH ISD	93,511	63,658	68%	2,210	2.36%	86%	1,860	1,185
KENNEDALE ISD	3,422	1,279	37%	61	1.78%	-9%	84	67
EAGLE MT-SAGINAW ISD	20,001	8,007	40%	337	1.68%	-18%	382	412
KELLER ISD	35,417	7,907	22%	540	1.52%	-16%	693	642
BIRDVILLE ISD	26,175	13,896	53%	320	1.22%	-13%	161	366
WHITE SETTLEMENT ISD	7,261	3,542	49%	86	1.18%	-29%	125	121
LAKE WORTH ISD	3,590	2,492	69%	40	1.11%	-2%	37	41
ALEDO ISD	5,307	630	12%	51	0.96%	55%	48	33
GODLEY ISD	2,019	1,015	50%	17	0.84%	-51%	22	35
GRAPEVINE-COLLEYVILLE ISD	14,333	3,045	21%	120	0.84%	24%	119	97
CASTLEBERRY ISD	4,453	3,310	74%	31	0.70%	182%	16	11
CROWLEY ISD	16,431	9,559	58%	111	0.68%	178%	59	40
NORTHWEST ISD	21,065	3,804	18%	79	0.38%	-25%	86	105
MANSFIELD ISD	35,417	12,696	36%	80	0.23%	16%	82	69
BURLESON ISD	11,654	3,952	34%	14	0.12%	-84%	56	88
CARROLL ISD	8,043	120	1%	-	0.00%		0	0
SUM TOTALS	416,111	201,943	49%	7,724	1.86%	13%	7,008	6,819

Figure 154: Tarrant County school enrollment information, including homelessness (Public Education Information Management System, 2013 to 2015)

b.

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

FWHS is pursuing the goal of developing properties in locations that support improving lives through access to schools, transportation, jobs and services as well as making investments in distressed communities that preserve affordable housing and increase access to opportunity (Fort Worth Housing Solutions, 2017). HUD supports this balanced approach with guidance, resources and regulations (U.S. Department of Housing and Urban Development, 2016). Figure 155 displays properties currently held by FWHS (Fort Worth Housing Solutions, 2018). Properties shown in red were acquired or constructed between 1940 and 2010. Properties shown in green were acquired between 2011 and the present and include nine properties that are under construction or pending construction plans. Areas with newer properties extend within a larger radius throughout Tarrant County, while older properties remain primarily concentrated in central and southern Fort Worth.

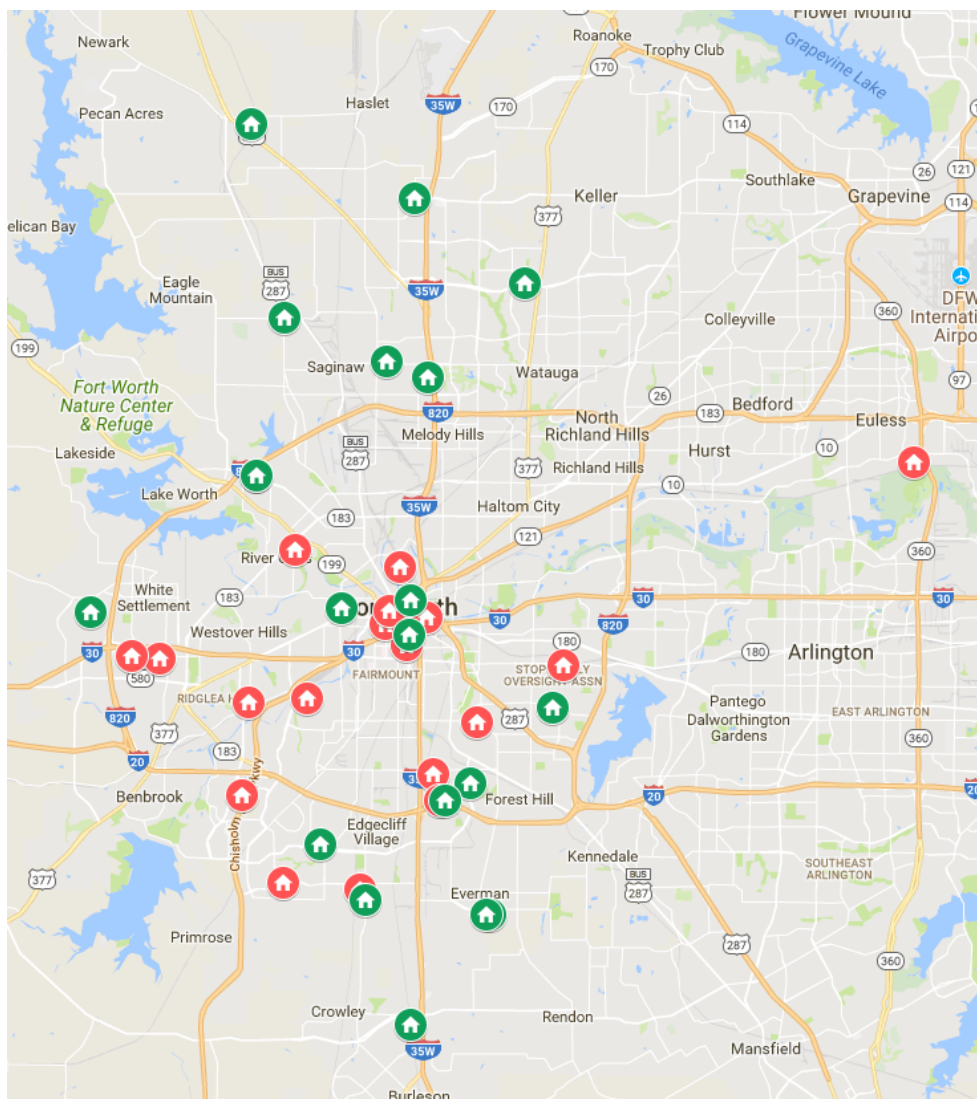


Figure 155: FWHS properties by date of acquisition or construction, red=through 2010, green=2011 to current

Figure 156 shows FWHS properties in sequence by date acquired or constructed along with demographic information about the properties' neighborhoods. Medians are calculated for the properties built or acquired before 2011 (approximately half of total FWHS holdings, shown in red) and the properties acquired or built in 2011 or later (shown in green). Statistics shown compare the presence of R/ECAPs and other measures of neighborhood poverty along with HUD's School Proficiency (SP)¹¹ index, which measures proximity to higher performing elementary schools. Some research finds that neighborhood poverty closely relates to educational attainment, especially for children in the elementary grades (Khadduri, 2001). Two properties, Woodmont and the Villas of Eastwood Terrace, are located in census tracts whose poverty rates declined from 42% in 2015 to 38% in 2016, dropping the designation of R/ECAP in 2016. One property (Villas by the Park) increased its poverty rate from 2015 to 2016 becoming a R/ECAP. Comparisons of the locations of older and newer properties yield the following observations.

- Properties acquired after 2010 are located in lower poverty census tracts within fewer R/ECAPs. Five of the 18 older properties are located in R/ECAPs and two of the 20 newer properties are located in R/ECAPs in 2016.
- The median Low Poverty¹² (LP) index value (HUD 2013) for pre-2011 properties is 15 and the median LP value for properties acquired after 2010 is 64, an increase of 49 points. Ten of the more recently acquired properties are located in census tracts with low poverty scores above 50, indicating that the exposure to poverty in these census tracts is lower than in 50% of U.S. census tracts.
- The median 2016 poverty rate for older FWHS properties (the percent of residents with incomes below the federal poverty level) is 30% while the median poverty rate for more recently acquired properties is 12%, a decrease of 18 percentage points.
- The median SP index (HUD 2013) increases from 23 in older properties to 30 in newer properties. Seven of the newer properties are located in census block groups (smaller than census tracts) with school proficiency indices of greater than 50, indicating that elementary school performance in these neighborhoods ranks above 50% of all Texas neighborhoods.

¹¹ The School Proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

¹² The Low Poverty Index captures the intensity of poverty in a given neighborhood. The index uses family poverty rates. Values are inverted and percentile ranked nationally. The resulting values range from zero to 100. The higher the score, the less exposure to poverty in a neighborhood.

FWHS Property	Year Acquired/Built	Tract code	2016 R/ECAP	LP Index	2016 poverty rate	SP Index
Butler Place Apartments	1940	101700	R/ECAP	0	79%	2
Cavile Place Apartments	1954	103601	R/ECAP	0	65%	6
Hunter Plaza	1970	123300		67	6%	26
Fair Park Apts.	1974	105902	R/ECAP	2	42%	28
Fair Oaks Apts.	1974	100700		10	33%	20
Siddons Place (Pennsylvania Place)	1998	123600		8	36%	19
Henderson	1999	123400		18	23%	55
Overton Park Townhomes	2002	105513		54	22%	71
Sycamore Center Villas	2004	111005		19	27%	19
Villas of Oak Hill (fka Stonegate)	2005	105403		69	10%	90
Cambridge Court	2006	105201	R/ECAP	6	42%	19
Woodmont Apartment Homes	2006	105901		1	38%	30
Pavilion at Samuels	2006	123200		27	21%	54
Candletree Apartments	2007	105512		82	10%	14
Wind River Apartments	2008	105205		12	34%	19
Villas on the Hill	2010	102401		43	21%	52
Villas by the Park	2010	104604	R/ECAP	5	45%	19
Post Oak East Apts.	2010	106517		43	11%	77
Carlyle Crossing	2011	105502		40	27%	16
Aventine Apartments	2011	113921		84	2%	82
Knights of Pythias Lofts	2012	123300		67	6%	26
Sedona Village	2013	105008		81	11%	15
Villas of Eastwood Terrace	2013	106202		5	38%	2
HomeTowne at Matador Ranch	2013	111005		19	27%	19
Reserve at Western Center Blvd	2014	105008		81	11%	13
Reserve at McAlister	2015	111013		64	12%	64
Avondale Apartments	2015	114103		88	6%	65
Hillside Apartments	2015	123300		67	6%	26
Stallion Pointe	2017	106004		11	26%	43
Alton Park	2018	100501		25	21%	32
Campus Drive	2018	105902	R/ECAP	2	42%	13
Palladium	2018	110805		91	6%	56
Harmon Senior Villas	2018	113926		72	3%	95
Standard at Boswell	2018	114104		86	3%	75
Springs	2019	102100		40	15%	77
Patriot Pointe	2019	105902	R/ECAP	2	42%	28
Stallion Ridge	2019	106004		11	26%	43
South Main	2019	123600		8	36%	19
Median - 1940-2010				15	30%	23
Median - 2011-2019				64	12%	30
Median - All Properties				27	22%	27
Change - Pre-2011 vs. Post 2010			-2	49	-18%	7

Figure 156: FWHS properties by census tract with demographic and school performance data (HUD/ACS):

Figure 157 makes the same comparisons between older and newer FWHS properties using HUD indices for proximity to jobs, transportation cost and access and the presence of environmental hazards. Transportation, jobs and air quality (the measure used in HUD's Hazard index) have logical interaction effects and contribute to quality of life. The table indicates the following observations:

- Median scores on the HUD 2013 Job Proximity¹³ (JP) index declined from 68 for older properties to 59 for more recently acquired properties. The decrease in this score could be attributable to new jobs being located in more suburban and peripheral locations.
- The median Low Transportation Cost index¹⁴ also declined from 74 for older properties to 60 for newer properties, indicating an increase in the cost of transportation for persons living in these neighborhoods. An increase in suburban locations could also have contributed to this trend and relate to increased distance to jobs and services.
- The median Labor Market Engagement (LME) index score increased significantly from 26 for older properties to 42 for more recently acquired properties. Nine of the newer properties were located in census tracts with LME Index scores above 50, indicating that the labor force participation rate (percent of adults working) was higher in these census tracts than in 50% of all U.S. census tracts.
- Scores for the Transit Trips (TT) index¹⁵ remained essentially unchanged from older to more recently acquired properties. The likelihood that families use public transit in the FWHS jurisdiction in both new and old property neighborhoods is similar to as many as 50% of all US census tracts.
- The HUD data only included Environmental Health index scores for 19 of the census tracts with properties owned by FWHS. The median scores available improved by seven points from 25 for older properties to 32 for more recently acquired properties. This finding could reflect better air quality the further away from the Fort Worth City center concentration of highways and industries.

¹³ Job Proximity index values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

¹⁴ Low Transportation Cost values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the index, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a range of reasons, including greater access to public transportation and the density of homes, services and jobs in the neighborhood and surrounding community (HUD, Office of Policy Development & Research, 2017).

¹⁵ Transit Trips index values are percentile ranked nationally, with values ranging from zero to 100. The higher the TT index, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit (HUD, Office of Policy Development & Research, 2017).

FWHS Property	Year Acquired/Built	Tract code	JP Index	LTC Index	LME Index	TT Index	EH Index
Butler Place Apartments	1940	101700	80	78	0	52	8
Cavile Place Apartments	1954	103601	14	67	5	52	29
Hunter Plaza	1970	123300	98	86	30	51	<Null>
Fair Park Apts.	1974	105902	22	67	2	51	<Null>
Fair Oaks Apts.	1974	100700	43	62	26	53	20
Siddons Place (Pennsylvania Place)	1998	123600	97	81	5	53	<Null>
Henderson	1999	123400	99	84	26	53	<Null>
Overton Park Townhomes	2002	105513	46	90	55	66	<Null>
Sycamore Center Villas	2004	111005	58	56	25	51	11
Villas of Oak Hill (fka Stonegate)	2005	105403	51	84	88	66	32
Cambridge Court	2006	105201	29	80	11	59	24
Woodmont Apartment Homes	2006	105901	93	60	26	47	<Null>
Pavilion at Samuels	2006	123200	95	70	26	42	<Null>
Candletree Apartments	2007	105512	66	50	77	41	34
Wind River Apartments	2008	105205	89	84	29	66	22
Villas on the Hill	2010	102401	69	70	75	48	25
Villas by the Park	2010	104604	27	58	9	40	34
Post Oak East Apts.	2010	106517	92	81	68	62	<Null>
Carlyle Crossing	2011	105502	60	69	45	57	33
Aventine Apartments	2011	113921	38	50	85	48	<Null>
Knights of Pythias Lofts	2012	123300	98	86	30	51	<Null>
Sedona Village	2013	105008	51	63	72	58	<Null>
Villas of Eastwood Terrace	2013	106202	65	56	4	46	32
HomeTowne at Matador Ranch	2013	111005	58	56	25	51	11
Reserve at Western Center Blvd	2014	105008	3	63	72	58	<Null>
Reserve at McAlister	2015	111013	29	44	60	41	24
Avondale Apartments	2015	114103	49	27	81	28	46
Hillside Apartments	2015	123300	98	86	30	51	<Null>
Stallion Pointe	2017	106004	63	44	32	39	32
Alton Park	2018	100501	51	67	39	58	17
Campus Drive	2018	105902	41	67	2	51	<Null>
Palladium	2018	110805	14	46	65	37	<Null>
Harmon Senior Villas	2018	113926	60	36	72	36	<Null>
Standard at Boswell	2018	114104	64	24	79	20	<Null>
Springs	2019	102100	62	84	90	65	21
Patriot Pointe	2019	105902	22	67	2	51	<Null>
Stallion Ridge	2019	106004	63	44	32	39	32
South Main	2019	123600	97	81	5	53	<Null>
Median - 1940-2010			67.5	74	26	52	24.5
Median - 2011-2019			59	59.5	42	51	32
Median - All Properties			60	67	30	51	27
Change - Pre-2011 vs. Post 2010			-8.5	-14.5	16	-1	7.5

Figure 157: FWHS properties by year acquired/built with HUD indices for Jobs/Transit/Environment

Summary

This review of HUD's indices for measuring access to opportunity generally shows that FWHS is making progress, as it acquires and develops new affordable housing, in its efforts to provide access to neighborhoods with lower poverty and better local schools. More recently acquired properties are in communities with a greater percentage of adults in the work force. Transportation costs have increased as clients travel farther for work in more recently acquired properties, but access to public transportation has not declined, according to the HUD indices.

Most of the reduction in properties located in higher poverty neighborhoods is a result of the acquisition of properties between 2011 and 2017. Properties currently under construction or pending are in neighborhoods with median poverty rates of 21% compared with 11% in those properties acquired or constructed between 2011 and 2017. Median School Proficiency scores, however, are significantly higher in the newest properties under development, led by four developments in communities with School Proficiency indices of 56 to 95 points.

Two recently acquired FWHS developments in neighborhoods with significantly higher poverty rates are the Campus Drive and Patriot Pointe properties, both in census tract 105902. This community, with a 42% poverty rate, is, however, a resource-rich environment. Residents of the new developments will have access to the following resources and jobs within less than three-fourths of one mile, pictured in Figure 158 (Google, 2018):

- Tarrant County College South Campus (enrollment of over 8,500 students and offering certificates in architecture technology, automotive skills, computer-aided drafting, construction management, electronics, gaming, heating, air conditioning and refrigeration and welding) (Tarrant County College, 2017)
- Veterans Administration North Texas Health Care System, one of the largest VA facilities in the country (U.S. Department of Veterans Affairs, 2010)
- Tarrant County Resource Connection, a 292-acre campus, including TC Housing, TC Health and Human Services, TC Workforce Development and employment services, MHMR clinics for mental health and persons with intellectual and developmental disabilities, Aging and Disability Resource Center, probation and re-entry services for adults and juvenile offenders, TC Veterans services, immunizations, WIC and nurse-family partnership services, Aquatic Center with water treadmills and wheelchair accessibility (Tarrant County, 2018)
- Tarrant County Sheriff's Training Academy
- Rolling Hills Park and Soccer Complex

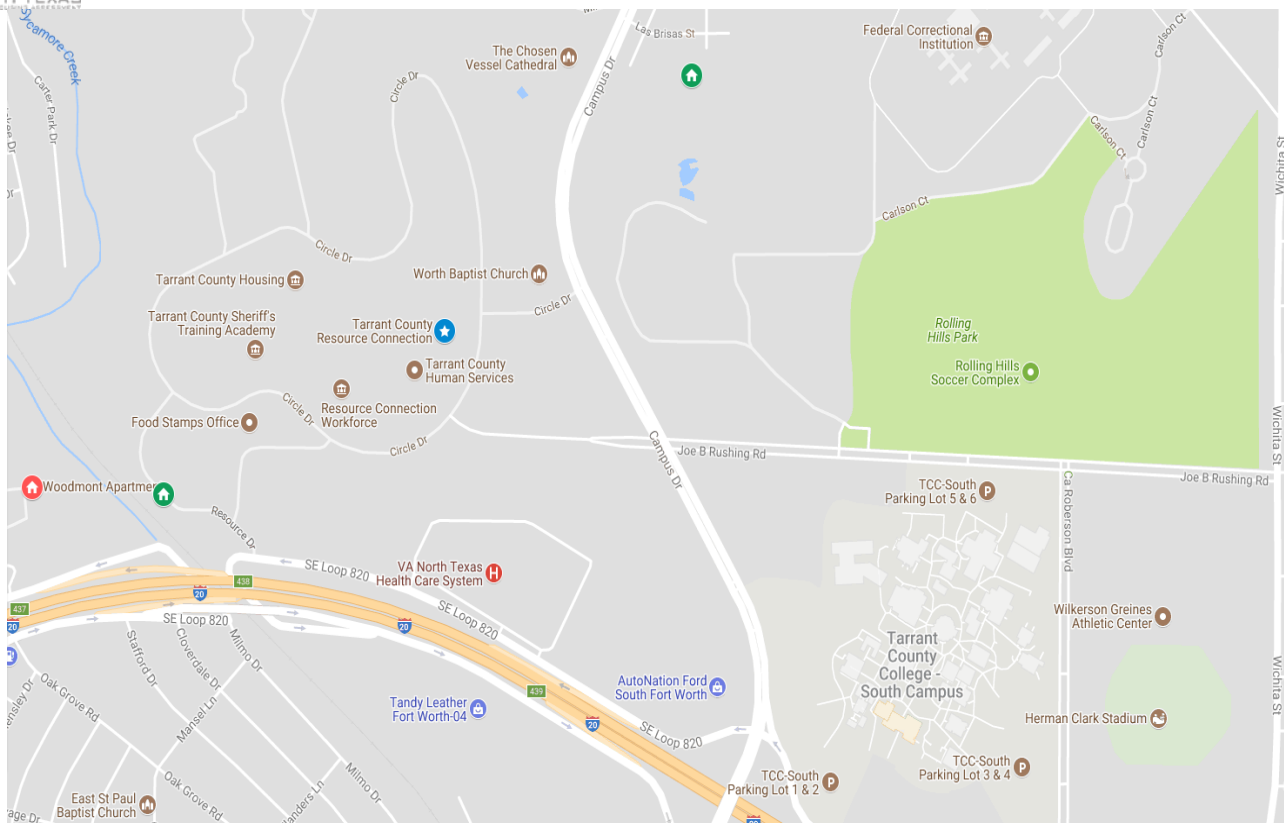


Figure 158: Census tract 1059.02 services, the Resource Connection

Contributing Factors of Disparities in Access to Opportunity

Approximately **17%** (300) of all FWHS comments from public participation events addressed contributing factors related to access to opportunity. **Location, size and type of affordable housing, lack of access to opportunity due to high housing costs and loss of affordable housing** received approximately 20% of comments and votes (60) in public participation events concerning access to opportunity. The following themes emerged:

Housing cost

Respondents and participants stated that high housing costs kept lower and middle-income households out of higher opportunity neighborhoods. Housing in high-opportunity areas is considered to be too expensive and too large. Housing that might be affordable requires too much repair. Respondents also told of having to compete with investors for housing, driving up prices. Respondents said that gentrification, particularly in areas like Southside, was reducing the availability of affordable housing in their community and increasing property taxes (through increased valuations), causing a loss of affordable housing. Many respondents stated that there is a need for more affordable housing and mixed-income communities in all areas of the City.¹⁶

¹⁶ Theodos et al. (2018) identified four census tracts in Tarrant County that experienced significant socioeconomic change from 2000 to 2016 (greater than one standard deviation from the mean of all U.S. census tracts), including increases in residents with bachelor's degrees, median family income, share of non-Hispanic white residents and housing cost burden. Three of these census tracts were in the Fort Worth South or Southside area west of I-35.

The Federal Reserve Bank of Dallas has identified housing affordability as one of the biggest economic issues in the region, driven by in-migration and rising costs of land and labor (Ash, 2018). The Dallas-Fort Worth metropolitan area is second in the nation in total net migration from 2011 to 2014 and 38% of population growth was due to domestic in-migration (Assanie, Davis, Orrenius, & Weiss, 2016). Figure 159 displays the percent of homes sold in the Fort Worth-Arlington area (blue line) that would have been affordable to a family earning the median income for the area (National Association of Home Builders, 2018). The percent of affordable homes in the Fort Worth-Arlington area (Housing Opportunity Index, HOI) decreased from a high of 88% in 2010 to a low of 59% in 2017. The Fort Worth-Arlington HOI was 15.5 percentage points lower than the US national HOI in the first quarter of 2010 indicating greater affordability. The difference between Fort Worth-Arlington and the national average shrank to 1.7 percentage points by 2018.

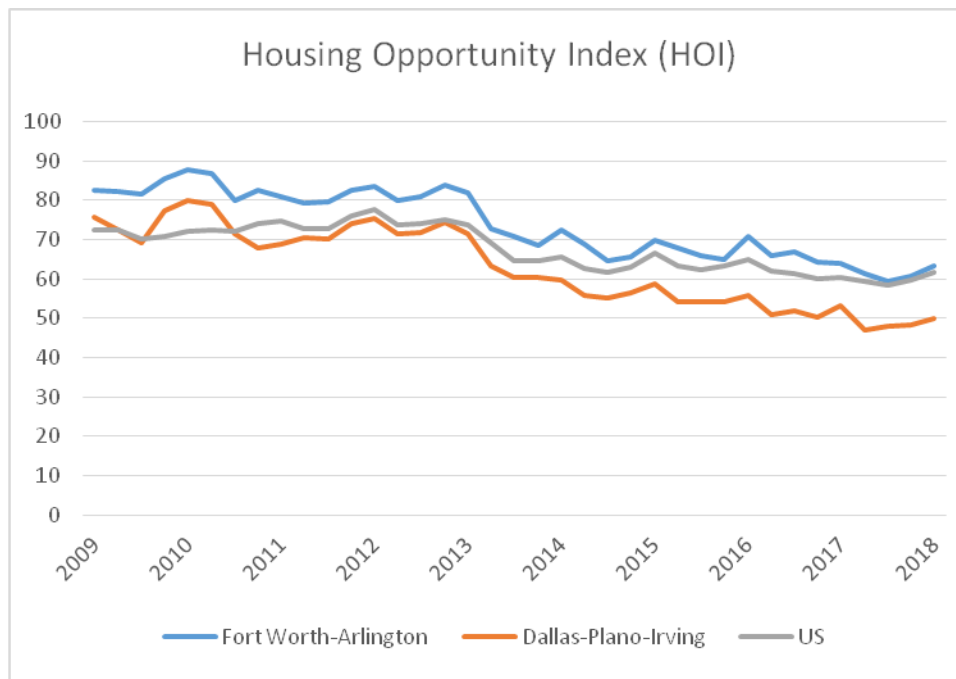


Figure 159: Percent of homes sold affordable to households at are median income (National Association of Home Builders/Wells Fargo Housing Opportunity Index 2018)

Sample related comments:

- I have lived in FW all my life and have not tried to own a home due to high costs. I am a TCU business school graduate and make a decent salary, but the debt I have to repay leaves me little to nothing to save for a home. (CFW survey 21)
- I wish renters had more variety – size, location, neighborhood – when it comes to rental properties. (CFW survey 23)
- Housing costs are becoming extremely expensive in Fort Worth. I'm afraid we will end up losing the middle classes if we're not careful. (CFW survey 35)
- Many of those [homes] in my price range were very competitive; a few that I made offers on were purchased for cash by investors, which was hard to compete with when I needed financing. (CFW survey 57)
- There is not much available in this area in the \$100,000 - \$150,000 range that isn't a double wide and/or needing lots of repair or in an unsafe or desirable area. (CFW survey 58)

- Developers who scrape perfectly good homes in our neighborhood and re-build McMansions are eliminating fair housing opportunities in our community. (CFW survey 64)
- Our rent has [gone] up every year since we moved in. (CFW survey 134)
- Complexes with truly sliding scale rent programs would allow for more diversity within a section of the City rather than isolating groups economically. (CFW survey 140)
- It is counterintuitive and a bigger frustration to see the city take up issues like homelessness, only to turn around and build yet another apartment complex charging \$1,500 for a single-bedroom downtown. (CFW survey 192)
- I live in Fairmount and the availability of affordable housing has dropped in recent years due to gentrification. (CFW survey 193)
- Rents are too high for most of us to afford; we have to choose between paying our rent or feeding our family. (CFW survey 206)
- Fair housing must be dispersed and integrated, not crammed into one area of town. (CFW survey 209)

Availability of services

Residents from higher opportunity areas contend that their communities do not have transportation, grocery and other services readily available to support low- and moderate-income families. Information from the United States Department of Agriculture Food Access Research Atlas (2015) indicates that lower income communities with no access to grocery stores within one mile are consistent with areas previously discussed as higher poverty with higher concentrations of minority residents. Figure 160 indicates these areas in green. Higher income communities (far north and southwest Fort Worth) have greater access to grocery stores.

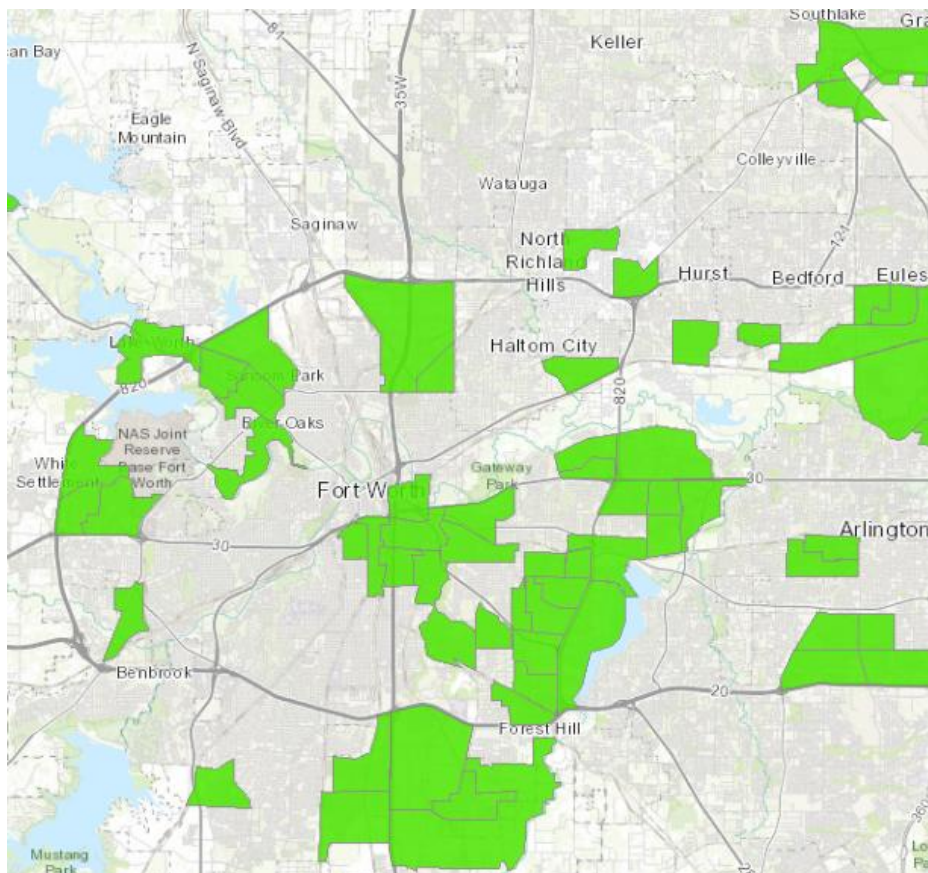


Figure 160: Lower-income census tracts in Tarrant County with no grocery stores within one mile (USDA 2015)

Sample related comments:

- High-opportunity areas – these areas have limited services [such as] schools, transportation; people go back to where they came from
- Ryan Place is attractive but [has] no services
- Any time you add the services the prices rise
- West side – no services – not affordable; don't see builders with small starter homes – people need a \$70k product
- In 1980, we had eight grocery stores [in east Fort Worth] and now we have two. Our department store is now a crime lab. We have a food swamp on East Lancaster with only fast unhealthy food.

Safety

Many of the respondents to the City of Fort Worth survey stated that affordable housing is only available in neighborhoods that lack safety. Respondents said they could not find affordable housing in areas they considered safe. Many respondents stated that they believe or have observed that the introduction of subsidized or affordable housing causes crime and property deterioration. Many respondents stated that they were not able to find affordable housing in communities where they wish to live.

Sample related comments:

- We need more affordable low-income housing with access to public transportation in safer neighborhoods. It's just that simple. (CFW survey 1)
- Any housing that is remotely affordable is in dangerous areas, and the properties are ill maintained. (CFW survey 2)
- The affordability of home prices is the most important factor at the present time. The purchase prices have increased to the point that safe, well-made housing has become increasingly unaffordable and unattainable for a majority of the citizens in Fort Worth. (CFW survey 6)
- I live alone. I cannot get a house because of my marital status and there are no affordable home options in a safe neighborhood with the City of Fort Worth. In addition, the apartment rents are becoming too inflated. My option will be to soon move out of the City (CFW Survey 112)
- It has been hard for me to find a place that I think is safe enough for me and my child. (CFW Survey 143)
- The rental properties that are affordable to the average family are in run down, unsafe areas of Fort Worth. (CFW Survey 160)
- I see lots of luxury apartments and some income-restricted apartments being built but have extreme difficulty finding available, let alone affordable, units in safe areas for those of us who are in between. (I earn 63% of AMI for my age and household size. (CFW Survey 164)
- I want a safe home in a safe neighborhood that is less than \$1,200 a month. True, there are slum lord options, but I also don't want to live near drug dealers, either. (CFW Survey 176)
- Our neighborhood is being ruined by low-income housing. (CFW Survey 15)
- It has been shown time and again that where affordable housing is offered, crime rates go up. (CFW Survey 218)

The Neighborhoods of East Fort Worth, an alliance of neighborhood associations, held a meeting in May 2017 to discuss crime, trash and other problems believed to be associated with Section 8 housing in their community. The Fort Worth police department, City staff, a former City council member, FWHS and Tarrant County housing authority staff, apartment managers, residents and neighborhood association leaders met to discuss the problems and identify solutions. Housing authority staff members reported that the apartments in the area actually had very low levels of publicly assisted housing residents. The former council member stated that it was important to “decouple Section 8 with crappy apartment complexes” because he has not found an association between problem apartments and Section 8 households. He stated that programs that engage the City with apartment owners and new management significantly decreased crime and improved economic development in the Woodhaven area, once known for problem apartments. Housing authority representatives said that they do not authorize voucher holders to live in apartments that do not meet quality standards and that voucher holders must pass background checks. They rely on property managers to enforce leases and follow-up with residents when there are problems.

The Las Vegas Trail community has received significant attention from the City, nonprofits and the press with efforts to address crime in the 32 apartment complexes concentrated in the area. Half of the 32 apartment complexes in the area include publicly subsidized housing units. Analysis of the correlation between calls for police service and presence of subsidized units at each apartment complex found no statistically significant relationship. Complexes with more subsidized units did not have more calls for police service after controlling for the total number of units (size) of the apartment complex.

Other

Lack of access to affordable, reliable **transportation**, discussed above, was also identified as a significant barrier to opportunity.

Access to proficient public schools received 9% of the comments documented at public meetings and focus groups. Location of quality schools was rated extremely important to access to opportunity by 81% of black respondents, 88% of Asian respondents, 75% Hispanic respondents and 65% of white respondents to the City of Fort Worth survey.

Sample comments from appendix:

- Our school systems – the funding is an issue. There is massive growth and nothing is being done. The schools are overcrowded.
- Our neighborhood members are sending their kids to private schools because the public ones aren't good anymore.
- We are moving to Arlington Heights for schools, walk-ability and close to cultural district; [but we are] not finding affordable housing.
- School needs help (Las Vegas Trail) – filled with special education, regular kids, 18 kids per class; kids run out the door any time; we barely keep the classroom under control; some kids illiterate; need more volunteers or school system needs to understand poor conditions; teacher buys own supplies, no supplies for kids; kids are starved.
- The better schools in Fort Worth are not available to all because of lack of affordable housing and school boundary lines. Citizens should have a choice of which elementary

school like high school their children can attend so affordable housing is not a limiting factor. (CFW survey 187).

Lack of private and public **investments in neighborhoods** received 44 comments in public meetings and focus groups as a contributing factor to disparity in access to opportunity.

iv. Disproportionate Housing Needs

Analysis

a

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

Figure 161 shows the percentage of race/ethnic groups experiencing one of four housing problems: housing cost burden (defined as paying more than 30% of income for monthly housing costs, including utilities), overcrowding (more than one person per room), lacking a complete kitchen or lacking plumbing. Figure 162 presents the same data for severe housing cost burden, which is paying more than 50% of income for monthly housing costs, including utilities.

Nearly 37% of Fort Worth households suffer at least one housing problem while at the regional level almost 35% of households experience a housing problem. Hispanic households in Fort Worth appear disproportionately impacted by housing problems, with 46% of Hispanic households experiencing housing problems, which is less than the regional value of 49%. Black households in Fort Worth have the highest rate at about 48% and slightly more than the regional rate of 46%. White households in Fort Worth experience housing problems at about the same rate (27%-28%) as white households throughout the region. Native American households experience almost the same trend. Asian/PI households experience slightly higher housing problem rates in Fort Worth when compared to the DFW region.

In Fort Worth, households with more than five people experience a high rate (53.5%) of housing problems, which is higher than the regional rate of over 50%. Family households with fewer than five people and non-family households also experience slightly higher housing problems than at the regional level.

As before with housing problems, severe housing problems occur in 20% of Fort Worth households while at the regional level over 18% of households experience a severe housing problem. Fort Worth's white (13%), black (27%), Asian/PI (24%), Native American (18%) and other (22%) households experience severe housing problems more frequently than their overall regional rates (12%, 24%, 19%, 17% and 20% respectively). Housing problems for Hispanic households in Fort Worth happen at a lower rate (27%) than the region (30%).

Disproportionate Housing Needs	(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction			(Dallas-Fort Worth-Arlington, TX) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	37,275	133,655	27.89%	360,875	1,348,425	26.76%
Black, Non-Hispanic	25,130	52,649	47.73%	165,008	362,115	45.57%
Hispanic	30,700	66,749	45.99%	230,317	466,931	49.33%
Asian or Pacific Islander, Non-Hispanic	2,865	8,010	35.77%	37,039	114,143	32.45%
Native American, Non-Hispanic	275	939	29.29%	2,352	7,647	30.76%
Other, Non-Hispanic	1,199	3,154	38.02%	12,863	34,357	37.44%
Total	97,465	265,175	36.75%	808,445	2,333,530	34.64%
Household Type and Size						
Family households, <5 people	42,120	142,550	29.55%	375,730	1,337,021	28.10%
Family households, 5+ people	19,320	36,135	53.47%	142,804	283,318	50.40%
Non-family households	36,030	86,505	41.65%	289,900	713,190	40.65%
Households experiencing any of 4 Severe Housing Problems						
	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	17,505	133,655	13.10%	166,886	1,348,425	12.38%
Black, Non-Hispanic	14,525	52,649	27.59%	88,173	362,115	24.35%
Hispanic	18,123	66,749	27.15%	138,278	466,931	29.61%
Asian or Pacific Islander, Non-Hispanic	1,999	8,010	24.96%	21,545	114,143	18.88%
Native American, Non-Hispanic	175	939	18.64%	1,307	7,647	17.09%
Other, Non-Hispanic	694	3,154	22.00%	6,805	34,357	19.81%
Total	53,030	265,175	20.00%	422,970	2,333,530	18.13%

Figure 161: Demographics of households with disproportionate housing needs for CFW and DFW region (HUD Table 9, CHAS 2013)

Fort Worth severe cost burden by race/ethnicity/family size

In 2013, around 15% of Fort Worth households experienced severe housing cost burden, which is slightly higher the regional rate of 14%. The white population experiences a similar rate (about 11%) of severe housing cost burden in Fort Worth and the region. All other races/ethnicities except Hispanic, suffer severe housing cost burdens at a higher rate in Fort Worth. Black and Asian/PI households experience severe housing cost burdens at a rate (23%, 18%), higher than in the region (21%, 13%). Native American and other, non-Hispanic residents also face severe housing cost burdens more often in Fort Worth (16.5%, 19%) than the region (13%, 17%). In Fort Worth, non-family households experience the highest rate of severe cost burden at over 21%, which is almost twice as high as either family household group within Fort Worth. Fort Worth families experience severe housing cost burdens at rates higher than the region.

Households with Severe Housing Cost Burden	(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction			(Dallas-Fort Worth-Arlington, TX) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	15,005	133,655	11.23%	144,430	1,348,425	10.71%
Black, Non-Hispanic	12,235	52,649	23.24%	75,740	362,115	20.92%
Hispanic	10,495	66,749	15.72%	77,640	466,931	16.63%
Asian or Pacific Islander, Non-Hispanic	1,510	8,010	18.85%	15,308	114,143	13.41%
Native American, Non-Hispanic	155	939	16.51%	995	7,647	13.01%
Other, Non-Hispanic	605	3,154	19.18%	5,784	34,357	16.83%
Total	40,005	265,175	15.09%	319,897	2,333,530	13.71%
Household Type and Size						
Family households, <5 people	17,130	142,550	12.02%	146,930	1,337,021	10.99%
Family households, 5+ people	4,624	36,135	12.80%	34,145	283,318	12.05%
Non-family households	18,230	86,505	21.07%	138,818	713,190	19.46%

Figure 162: CFW and DFW Region Severe Housing Cost Burden Household Demographics (HUD Table 10, CHAS 2013)

b.

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

Locating FWHS jurisdiction housing problems by race

Most census tracts in the FWHS jurisdiction have housing problem reporting rates greater than 20%. Highly segregated areas within the FWHS jurisdiction, for example northwest and southeast of downtown and inside I-820, also experience greater overall housing problem rates (Figure 163). Housing problems vary significantly by race and ethnicity. In most census tracts in Fort Worth, 20% to 80% of black and Hispanic households report housing problems. In many census tracts, more than 80% of black households report housing problems.

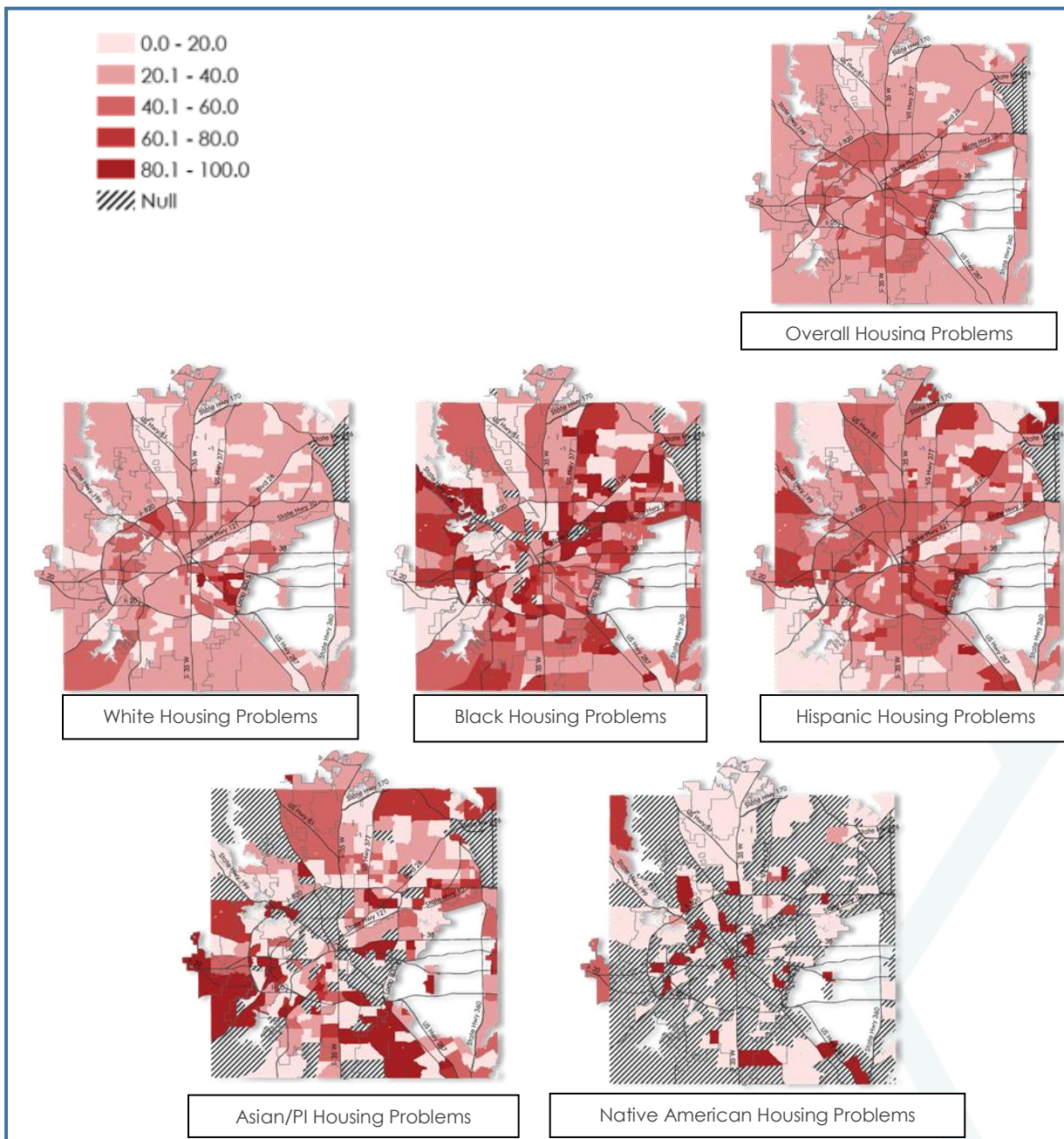


Figure 163: Percent of residents with housing problems by race (CHAS 2014)

Locating the region's housing problems by race/ethnicity

Housing problems prevail in and around the region's two hubs, Dallas and Fort Worth. Both cities feature large areas where the populace experiences housing problems at a rate of at least 40% (Figure 165). These occur throughout Dallas (except north Dallas), southeast Fort Worth, northwest Fort Worth (inside I-820), Irving, Garland near I-635 and Arlington and Grand Prairie between I-30 and I-20. Many clusters of census tracts in each city exist where more than 60% of the population suffer at least one housing problem and feature several R/ECAPs.

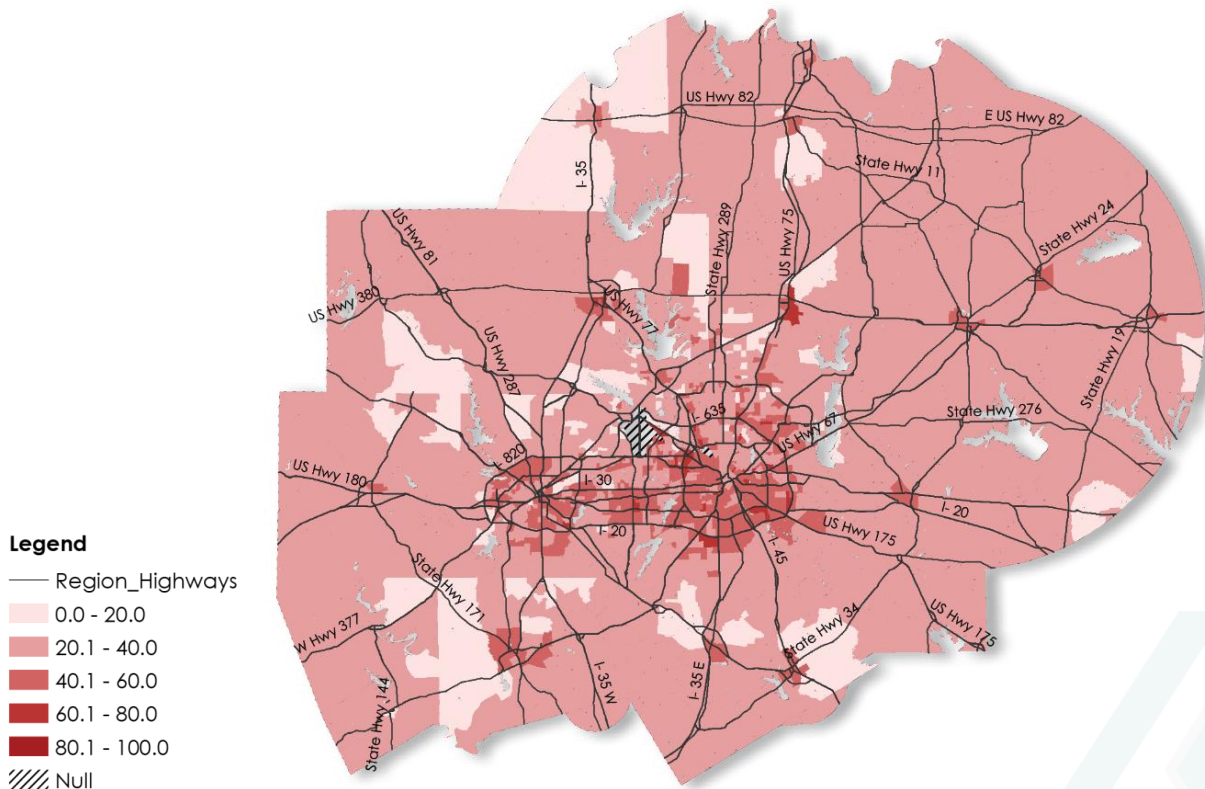


Figure 165 : Overall Housing Problems throughout the Region (CHAS 2013)

Non-white households seem to be far more likely than white households to suffer housing problems in the region's rural and suburban areas (Figure 166). While the non-white populations in some of these areas may be relatively small, those present often incur extremely high rates of housing problems. Large proportions of the white population only appear to suffer housing problems in a few isolated census tracts while the intensity of housing problems for other races and ethnicities appears far more frequently and spatially. Another aspect of the problem may be the emergence of struggling ethnic enclaves, with lower living standards than their surrounding neighborhoods.

The percentage of households experiencing housing problems in the FWHS jurisdiction remains higher than that in the region. Central portions of Fort Worth suffer particularly high rates of housing problems. Hispanic and black residents concentrate in these census tracts. In addition to experiencing housing problems in areas with a concentration of non-white individuals, each group tends to experience housing problems in locations where the white population does not. This occurs in Fort Worth, where black, Hispanic and Asian/PI households suffer high rates of housing problems throughout Tarrant County. Along with the appearance of other similar situations, this raises questions regarding access to affordable, quality housing for non-white individuals in some portions of the region.

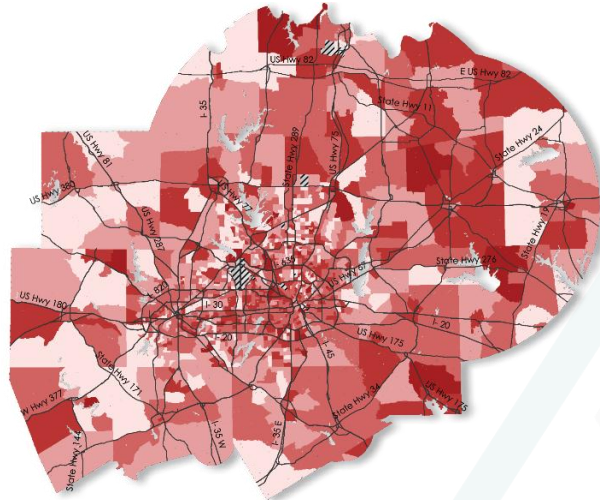
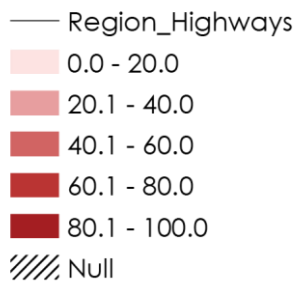


White Housing Problems



Black Housing Problems

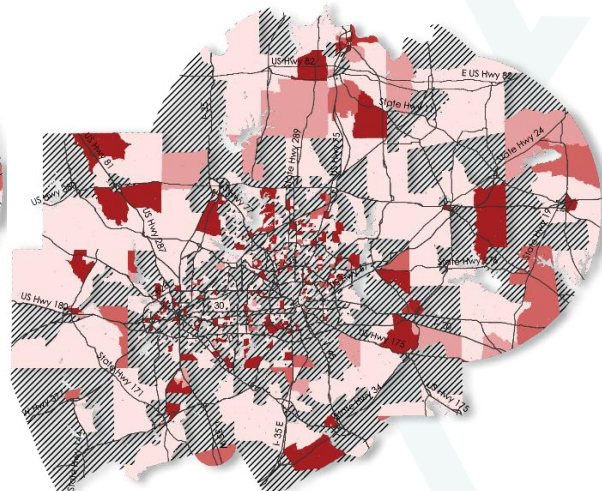
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Hispanic Housing Problems



Asian/PI Housing Problems



Native American Housing Problems

Figure 166: Housing Problems by Race/Ethnicity throughout the region (CHAS 2013)

Locating severe cost burden by race/ethnicity in Fort Worth

As of 2013, 15% of households in Fort Worth (Figure 167) report spending more than 50% of their income on housing and utilities (severe housing cost burden). The greatest concentrations of severe cost burden occur in more-segregated southeast and northwest Fort Worth. In some census tracts in east Fort Worth and west Tarrant County, 80.1% to 100% of black households report severe cost burden. Minority households experience relatively high rates of severe cost burden while few white households paid over 50% of income toward housing costs.



Figure 167: Severe cost burden by race/ethnicity in FWHS jurisdiction (CHAS 2013)

Locating severe cost burden by race/ethnicity throughout the region

Looking at the population as a whole, the largest concentrations of severe cost burden appear in south and east Dallas and southeast Fort Worth (Figure 168). Smaller concentrations appear in south Denton, east McKinney, southeast Irving and other southern suburbs in Dallas and Tarrant Counties.

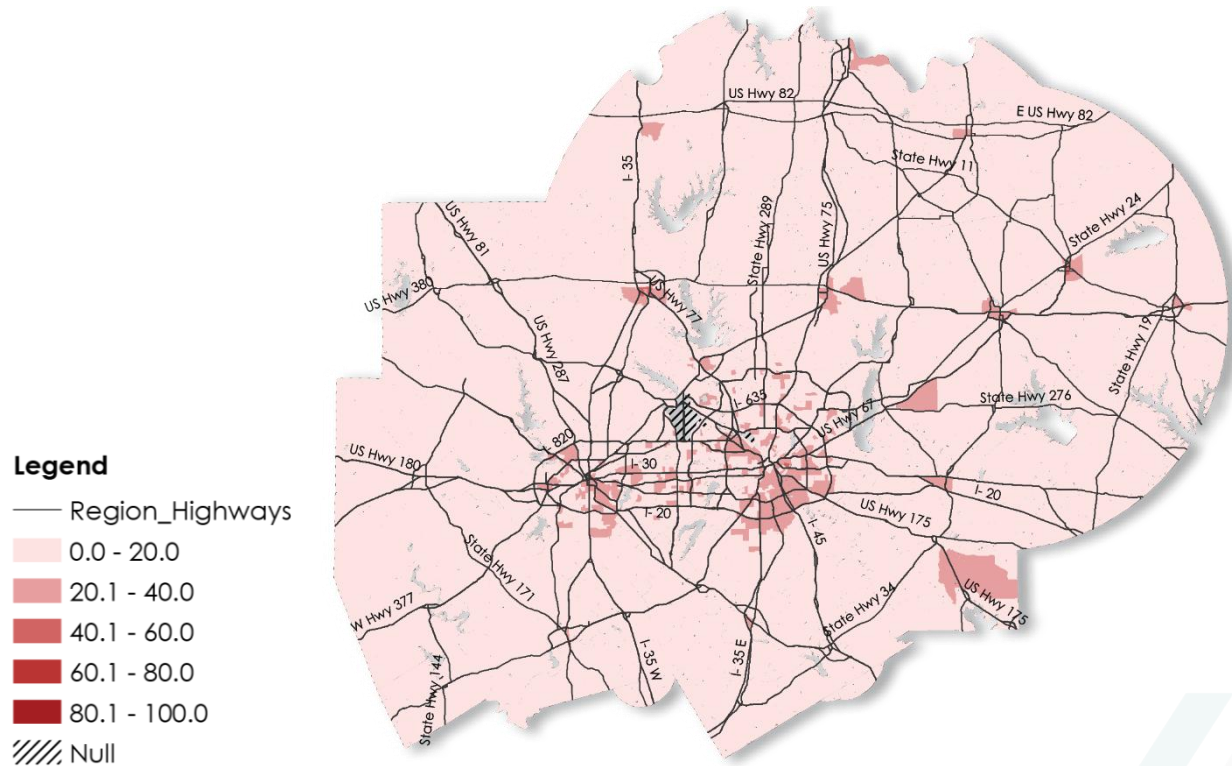
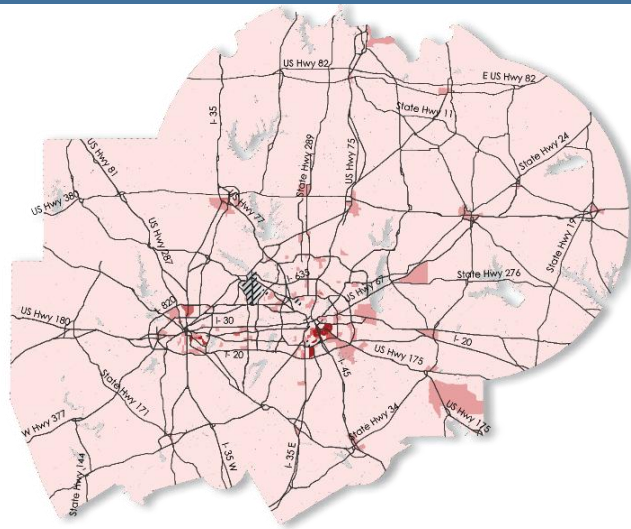
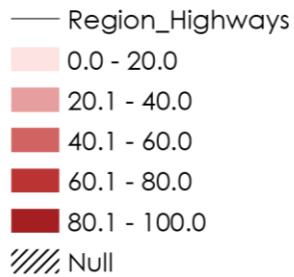


Figure 168: Severe cost burden throughout the region (CHAS 2013)

The white population faces concentrations of severe cost burden in isolated cases. Several outlying areas feature high levels of severe cost burden for some of the region's minority populations, which repeat the pattern evident for housing problems (Figure 169). High percentages of black residents scattered in the region's northeast corner pay over 50% of income toward housing costs, as well as in other suburban areas, Plano and McKinney. Hispanic residents have the same wide spatial distribution of severe cost burdens as the white population, with greater concentrations. These concentrations appear particularly strong near areas with lower poverty. Asian/Pacific Islander households tend to experience severe cost burdens in areas with lower poverty.

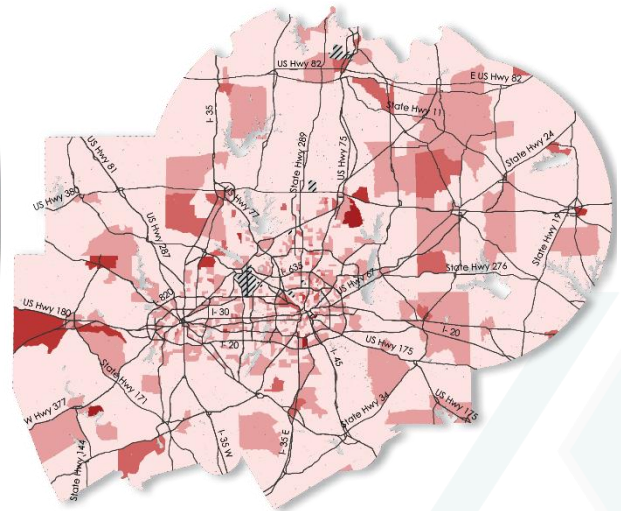
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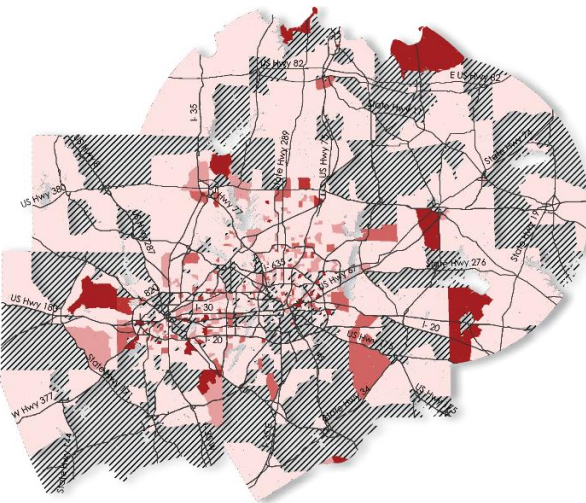
White Severe Cost Burden



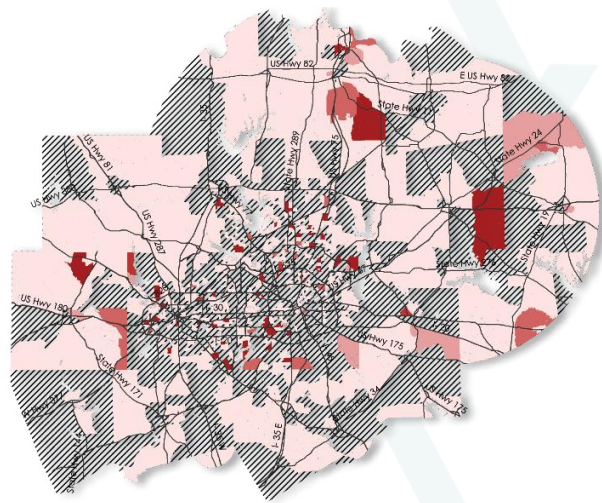
Black Severe Cost Burden



Hispanic Severe Cost Burden



Asian/PI Severe Cost Burden



Native American Severe Cost Burden

Figure 169: Percent of households reporting severe housing cost burden by census tract, FWHS jurisdiction (CHAS 2013)

Comparing FWHS jurisdiction and the NTRHA region

White (13%), black (27%), Asian/PI (24%), Native American (18%) and other (22%) households in the FWHS jurisdiction experience severe housing problems more frequently than their overall regional rates (12%, 24%, 19%, 17% and 20%, respectively). The percentage of Hispanic residents paying over 50% of income toward housing costs remains below the region. Non-white households suffer severe cost burden relatively frequently in portions of both Fort Worth and the region where few white households experience severe cost burden.

c.

Compare the needs of families with children for housing units with two and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

Figure 170 displays the estimated number of families below the poverty level in the FWHS jurisdiction (Fort Worth and Tarrant County, excluding Arlington) (U.S. Census, 2016). Public housing assistance prioritizes households at 30% area median income or those with incomes below the federal poverty level (Center on Budget and Policy Priorities, 2017). More than 38,000 families with incomes below the federal poverty threshold live in the FWHS jurisdiction. This number far exceeds the number of units of assisted housing available from all housing authorities in Tarrant County (approximately 17,450 units) (U.S. Department of Housing and Urban Development, 2017). Over 27,000 families with incomes below the poverty level have three or more people, requiring two or more bedrooms. More than 19,000 households with five or more people in the City of Fort Worth reported housing problems, including paying more than 30% for housing and crowding (more than one person per room) (HUD AFFH Table 9, ACS 2013).

Families by number of persons and poverty status (ACS 2012-2016 5-Year Estimate)	Fort Worth CCD, Tarrant County, Texas		Northeast Tarrant CCD, Tarrant County, Texas		Total FWHS Jurisdiction	
	Total	Percent below poverty level	Total	Percent below poverty level	Total	Number below poverty level
Families	197,562	15.0%	147,903	5.8%	345,465	38,213
NUMBER OF PEOPLE IN FAMILY						
2 people	79,930	10.3%	61,275	4.6%	141,205	11,051
3 or 4 people	81,532	15.1%	66,086	5.6%	147,618	16,012
5 or 6 people	29,980	23.4%	18,078	8.3%	48,058	8,516
7 or more people	6,120	32.6%	2,464	24.6%	8,584	2,601

Figure 170: Families by size and poverty status, FWHS jurisdiction (ACS2012-2016 5-year estimate)

FWHS has a portfolio of less than 1,000 units with two or more bedrooms in its public and affordable housing programs, far below the needs of very low-income households (Fort Worth Housing Solutions, 2017).

d.

Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

In 2013, Fort Worth had a rate of homeownership (58%) slightly lower than the regional rate of 61% (Figure 171). White residents represent 43% of renters, approximately the same as their representation in the general population. Regionally, white households account for about two thirds of homeowners, but only represent about half the population. Black households account for 14% (Figure 171) of Fort Worth homeowners, significantly less than their representation in the

population (18%, Figure 172). Black households make-up only 10% of the homeowners in the DFW region but make-up 15% of the population. Hispanic households in Fort Worth are 25% of the homeowners while making up 34% of the general population. Regionally, this significant difference continues where Hispanic households account for almost 17% of home ownership and over 27% of the total population.

	(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction				(Dallas-Fort Worth-Arlington, TX) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	86,805	56.00%	46,865	42.54%	954,125	66.63%	394,290	43.73%
Black, Non-Hispanic	21,910	14.14%	30,740	27.90%	147,490	10.30%	214,595	23.80%
Hispanic	39,105	25.23%	27,650	25.10%	240,575	16.80%	226,355	25.11%
Asian or Pacific Islander, Non-Hispanic	4,995	3.22%	3,010	2.73%	68,504	4.78%	45,634	5.06%
Native American, Non-Hispanic	590	0.38%	355	0.32%	4,810	0.34%	2,805	0.31%
Other, Non-Hispanic	1,600	1.03%	1,555	1.41%	16,430	1.15%	17,915	1.99%
Total Household Units	155,000	-	110,175	-	1,431,930	-	901,600	-

Figure 171: Homeowners and renters by race, Fort Worth and DFW (HUD Table 16, CHAS 2013)

	Fort Worth		Dallas-Fort Worth-Arlington	
Race/Ethnicity	#	%	#	%
White, Non-Hispanic	312,551	42.14%	3,248,508	50.55%
Black, Non-Hispanic	135,743	18.30%	941,599	14.65%
Hispanic	251,371	33.89%	1,758,738	27.37%
Asian or Pacific Islander, Non-Hispanic	27,339	3.69%	343,585	5.35%
Native American, Non-Hispanic	2,502	0.34%	25,032	0.39%
Two or More Races, Non-Hispanic	11,258	1.52%	99,655	1.55%
Other, Non-Hispanic	995	0.13%	9,096	0.14%

Figure 172: Fort Worth and regional population by race and ethnicity, (HUD Table 1, ACS 2013)

Renters and homeowners also vary significantly in their rates of housing cost burden. Twenty-two percent of homeowners in Fort Worth pay more than 30% of their income for housing and utilities compared with 45% of renters (Figure 173 and Figure 174). These rates are significantly higher for non-white homeowners and renters. Twenty-seven percent of Hispanic homeowners pay more than 30% of their income for housing and utilities compared with 18% of white homeowners. Fifty-six percent of black renters pay more than 30% of their income for housing and utilities compared with 38% of white renters. Housing cost burden also tends to be more severe (paying more than 50% of income) for black, Asian, Native American and other renters than for white renters.

Tenure	Race/ethnicity	Cost burden	Number	% housing cost burdened	% homeowners by race/ethnicity
Total: Occupied housing units	All	All	273,455		
Owner occupied	All	All homeowners	156,480		57.2%
Owner occupied	All	Cost burdened	33,765	22%	
Owner occupied	White	All homeowners	86,870		55.5%
Owner occupied	White	greater than 30% but less than or equal to 50%	9,315		
Owner occupied	White	greater than 50%	6,435		
Owner occupied	White	Cost burdened	15,750	18%	
Owner occupied	Black	All homeowners	21,595		13.8%
Owner occupied	Black	greater than 30% but less than or equal to 50%	2,990		
Owner occupied	Black	greater than 50%	2,480		
Owner occupied	Black	Cost burdened	5,470	25%	
Owner occupied	Asian	All homeowners	5,390		3.4%
Owner occupied	Asian	greater than 30% but less than or equal to 50%	570		
Owner occupied	Asian	greater than 50%	710		
Owner occupied	Asian	Cost burdened	1,280	24%	
Owner occupied	Native American	All homeowners	515		0.3%
Owner occupied	Native American	greater than 30% but less than or equal to 50%	55		
Owner occupied	Native American	greater than 50%	75		
Owner occupied	Native American	Cost burdened	130	25%	
Owner occupied	Pacific Islander	All homeowners	30		0.0%
Owner occupied	Pacific Islander	greater than 30% but less than or equal to 50%	-		
Owner occupied	Pacific Islander	greater than 50%	-		
Owner occupied	Pacific Islander	Cost burdened	-	0%	
Owner occupied	Hispanic	All homeowners	40,265		25.7%
Owner occupied	Hispanic	greater than 30% but less than or equal to 50%	6,930		
Owner occupied	Hispanic	greater than 50%	3,750		
Owner occupied	Hispanic	Cost burdened	10,680	27%	
Owner occupied	other	All homeowners	1,815		1.2%
Owner occupied	other	greater than 30% but less than or equal to 50%	300		
Owner occupied	other	greater than 50%	155		
Owner occupied	other	Cost burdened	455	25%	

Figure 173: Homeowners housing cost burdened in Fort Worth by race/ethnicity (CHAS 2015)

Tenure	Race/ethnicity	Cost burden	Number	% renters cost burdened	% renters by race/ethnicity
Total: Occupied housing units	All	All	273,455		
Renter occupied	All	All	116,980		42.8%
Renter occupied	All	Cost burdened	52,895	45%	
Renter occupied	White	All	48,410		41.4%
Renter occupied	White	greater than 30% but less than or equal to 50%	10,040		
Renter occupied	White	greater than 50%	8,190		
Renter occupied	White	Cost burdened	18,230	38%	
Renter occupied	Black	All	32,995		28.2%
Renter occupied	Black	greater than 30% but less than or equal to 50%	8,855		
Renter occupied	Black	greater than 50%	9,495		
Renter occupied	Black	Cost burdened	18,350	56%	
Renter occupied	Asian	All	3,475		3.0%
Renter occupied	Asian	greater than 30% but less than or equal to 50%	610		
Renter occupied	Asian	greater than 50%	840		
Renter occupied	Asian	Cost burdened	1,450	42%	
Renter occupied	Native American	All	305		0.3%
Renter occupied	Native American	greater than 30% but less than or equal to 50%	25		
Renter occupied	Native American	greater than 50%	130		
Renter occupied	Native American	Cost burdened	155	51%	
Renter occupied	Pacific Islander	All	240		0.2%
Renter occupied	Pacific Islander	greater than 30% but less than or equal to 50%	55		
Renter occupied	Pacific Islander	greater than 50%	40		
Renter occupied	Pacific Islander	Cost burdened	95	40%	
Renter occupied	Hispanic	All	29,500		25.2%
Renter occupied	Hispanic	greater than 30% but less than or equal to 50%	7,225		
Renter occupied	Hispanic	greater than 50%	6,500		
Renter occupied	Hispanic	Cost burdened	13,725	47%	
Renter occupied	other	All	2,055		1.8%
Renter occupied	other	greater than 30% but less than or equal to 50%	265		
Renter occupied	other	greater than 50%	625		
Renter occupied	other	Cost burdened	890	43%	

Figure 174: Renters housing cost burdened in Fort Worth by race/ethnicity (CHAS 2015)

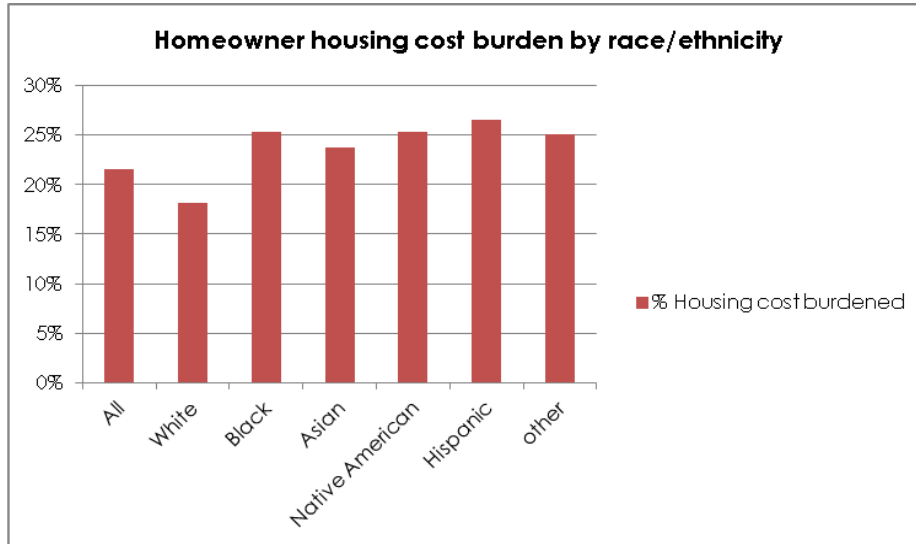


Figure 175: Percent of Fort Worth homeowners who pay more than 30% of income on housing and utilities within each race/ethnic group compared with all homeowners (CHAS 2015, Table 9)



Figure 176: Percent of Fort Worth renters who pay more than 30% of income on housing and utilities within each race/ethnic group compared with all renters (CHAS 2015, Table 9)

Additional Information

a.

Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

The rising cost of housing and housing values have a disproportionate effect on the following types of households in Fort Worth and across the region:

- Families
- Senior citizens and others living on fixed incomes such as persons with disabilities
- People who are homeless
- Lower income residents
- Young people just starting out to form their own households

Fixed incomes

Figure 177 displays 2016 income data for households in the FWHS jurisdiction (Fort Worth and Tarrant County, excluding Arlington) (U.S. Census Bureau, 2016). Over 114,000 households received Social Security (SS) income in 2016 or approximately 23% of the jurisdiction's households. The average income received from Social Security was \$18,148. Fourteen percent of the jurisdiction's households received retirement income, over 70,000 households. Households receiving at least one SS income and one retirement income could afford monthly rent and utilities of \$1,087, at 30% of income. Approximately 44,000 households may live on income from SS alone (number of households receiving SS income minus households receiving retirement income). A household living on one SS income could afford no more than \$454 per month on rent and utilities (spending 30% of income on housing). Households living on Supplemental Security Income (SSI) (over 20,000 households) for persons with disabilities had incomes averaging \$9,532 and could only afford monthly rent and utilities of \$238. A household living on one SSI check would spend 80% of its income on housing at HUD Fair Market Rents (Tarrant County Homeless Coalition, 2018). Households living on Cash Public Assistance (TANF, over 8,000 households) had average incomes of \$2,938 and could afford only \$73 per month in rent and utilities.

Average monthly rent in the Fort Worth area in the third quarter of 2017 was \$997 (MPF Research, 2017). Monthly rent for an efficiency apartment in east Fort Worth (lower housing cost area) averaged \$627 per month and were unaffordable to households living on SSI, cash public assistance or one SS income alone. The average market value of a single-family home in Fort Worth in 2017 was \$175,701 (Tarrant Appraisal District, 2017). Property taxes for the average home owner would exceed \$290 per month, including a homestead exemption and an exemption for being over age 65, making homeownership for a single person living on SS very challenging with little funds left to manage utilities, repairs and insurance (Tarrant County, 2018).

2016 FWHS jurisdiction households with fixed incomes (ACS)	Number of households	Average Income by Source	Affordable Monthly Housing Cost @ 30% of Income
With Supplemental Security Income (SSI)	20,373	\$9,532	\$238
With Cash Public Assistance income	8,281	\$2,938	\$73
With Social Security (SS) income	114,657	\$18,148	\$454
With Retirement income	70,583	\$25,342	\$634
If SS and Retirement income		\$43,490	\$1,087

Figure 177: Annual income for persons on fixed incomes, number and average (2016 ACS)

Young households

Figure 178 describes the numbers of various types of young households in Tarrant County (U.S. Census Bureau, 2016). Young households in the county occupy 30.2% of all housing units. The majority of these households (householder aged 15 to 34 years) in Tarrant County are married couples (61,467 households) and many families (householders of any age) have children all under age 6 (49,174 households). Married-couple families with a householder aged 34 or younger occupy 10% of rental housing units and 8% of owner-occupied housing units (renters and owners not shown in figure). Families with children under age 6 occupy 9% of rental units and 6% of owner-occupied units.

Young households in Tarrant County (2016 ACS, 5-Year Est.)	% of total housing units	# of housing units
Married-couple family, Householder 15 to 34 years	9.00%	61,467
Male-householder, no wife present 15 to 34 years	1.90%	12,976
Female-householder, no husband present 15 to 34 years	4.20%	28,685
Householder living alone, 15 to 34 years	5.10%	34,831
Householder not living alone, 15 to 34 years	2.80%	19,123
Family with own children under 6 years only	7.20%	49,174

Figure 178: Numbers of young families in Tarrant County, various types (ACS 2016 5-year estimate)

Figure 179 shows the distribution by annual income of young households (head of younger than 25 years) for the City of Fort Worth and Northeast Tarrant County which make up the FWHS jurisdiction (U.S. Census Bureau, 2016). More than 16,000 or 73.2% of all young households in the FWHS jurisdiction (Fort Worth and Northeast Tarrant Census County Divisions) have annual incomes of less than \$50,000 per year, approximately 80% of area median income for Tarrant County. Households with less than \$25,000 in annual income (more than 8,000 or 37% of young households) could afford no more than \$600 per month in rent at 30% of income.

Number of Households			
Tarrant County – Census County Divisions	Fort Worth	Northeast Tarrant	Total FWHS Jurisdiction
Total Households	296,142	204,689	500,831
Householder under 25 years:	15,018	6,966	21,984
Less than \$10,000	2,743	511	3,254
\$10,000 to \$14,999	1,323	392	1,715
\$15,000 to \$19,999	1,190	479	1,669
\$20,000 to \$24,999	1,033	468	1,501
\$25,000 to \$29,999	1,075	645	1,720
\$30,000 to \$34,999	1,120	761	1,881
\$35,000 to \$39,999	853	751	1,604
\$40,000 to \$44,999	1,022	553	1,575
\$45,000 to \$49,999	798	374	1,172

Figure 179: Households with householder under age 25 by annual income, 2016 ACS

Low-income families

Figure 180 displays annual household income for 2016 and the number of households at low and moderate-income levels (United States Census Bureau, 2016). Over 28,000 households in the FWHS jurisdiction (Fort Worth and Tarrant County, excluding Arlington) would be able to afford up to \$250 per month for rent at 30% of income leaving too little residual income to afford transportation, health-care, childcare and to meet other basic needs. Households with incomes of up to \$24,999 per year would not be able to afford an average efficiency apartment in east Fort Worth (\$627 per month) (MPF Research, 2017).

Number of households, Tarrant, Census County Divisions	Fort Worth CCD	Northeast Tarrant CCD	Total Households FWHS Jurisdiction	Affordable rent at 30% of income
	Households	Households		
	Estimate	Estimate		
Total	296,142	204,689	500,831	
Less than \$10,000	7.70%	2.80%	28,534	\$250
\$10,000 to \$14,999	5.10%	2.60%	20,425	\$375
\$15,000 to \$24,999	10.90%	6.70%	45,994	\$625
\$25,000 to \$34,999	10.80%	8.20%	48,768	\$875
\$35,000 to \$49,999	13.40%	11.60%	63,427	\$1,250
Median income (dollars)	\$ 52,060	\$ 74,773		
Mean income (dollars)	\$ 71,026	\$ 102,028		

Figure 180: Household income in the past 12 months, 2016 ACS, five-year estimate

Children

Over 97,000 children in Tarrant County or 18.4% of children aged 0-17 lived in families with incomes below the federal poverty level in 2015 (Annie E. Casey Foundation, 2017). Over 5,000 children were homeless in the 2014-2015 school year in the jurisdiction of FWHS (excluding Arlington) (Center for Transforming Lives, 2017). Over 9% of Tarrant county children in 2010 lived in communities where over 30% of households had incomes below the Federal poverty rate (Annie E. Casey Foundation, 2017). Over 128k children (24.8%) in Tarrant County in 2014 lived in households having difficulty meeting basic needs such as food. Over 20% of the students in the FWISD change schools within or outside the district every school year (Texas Education Agency, 2017). Causes of student mobility include housing instability due to evictions and loss of employment (Rumberger, 2015). Researchers find that school mobility negatively impacts test scores, high school graduation and development. Student mobility at highly rated Tanglewood Elementary School in higher income southwest Fort Worth was 6.1%, defined as students missing over six weeks of the school year (Texas Education Agency, 2017; Texas Education Agency, 2016). The student mobility score for very low performing John T. White Elementary School in east Fort Worth (a census tract with 19% of residents with incomes below the federal poverty level) was 40.2%. Children need housing stability to support educational progress. Low household incomes and high housing cost burdens threaten housing stability.

Worst case housing needs and housing cost burdens

The U.S. Census defines worst case housing needs as households that meet all the following criteria:

- No more than 50% of the Area Median Income (AMI)
- Do not receive government housing assistance
- Pay more than half of income for rent, live in severely inadequate conditions or both (Watson, Steffen, Martin, & Vandenbroucke, 2017)

Gross rent equaled 35% or more of income for 99,979 households in Tarrant County in 2016 or 39% of all renter households (U.S. Census Bureau, 2016). Almost half (48.5%) of households (177,000) in the Dallas-Fort Worth-Arlington metropolitan statistical area with incomes at or below 50% of area median income met the criteria for worst case housing needs in 2015. The number of households with worst case housing needs grew nationally by 39% from 2005 to 2015. Most worst case housing needs were a result of severe rental cost burdens rather than inadequate conditions. The national increase in worst case housing needs was accompanied by a significant shift from homeownership to rental housing. New renters absorbed much of the increase in the supply of rental housing, continuing competitive upward pressure on rents (Watson, Steffen, Martin, & Vandenbroucke, 2017).

Energy costs increase the severity of worst case housing needs. Drehabl and Ross (2016) found that energy costs take a disproportionate share of income for low-income (80% or below area median income), renters, black and Hispanic households in Fort Worth. Low-income households spend twice as much of their income (8%) than the median for all households (4%) (Figure 181). The highest cost quartile of low-income households spent nearly 13% of income on energy (Drehobl & Ross, 2016). The study found that low income, renters, black and Hispanic households live in homes that are less energy efficiency as measured by energy cost per square foot and benefit significantly from programs that provide funding for low cost weatherization, energy efficiency improvements and utility funding.

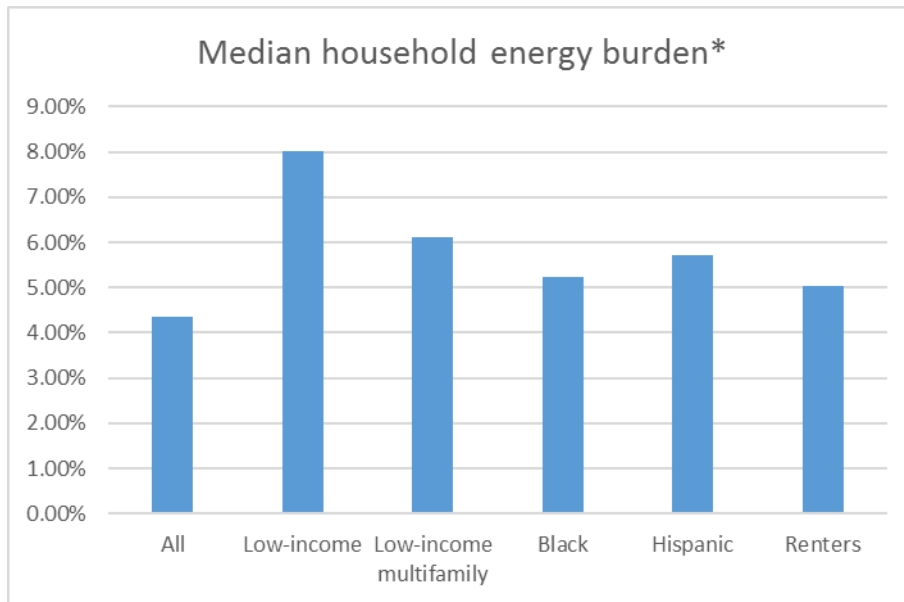


Figure 181: Percent of income spent on household utilities* by median households by group (Drehobl & Ross, 2016)

HUD defines housing cost burden as paying more than 30% of income for rent and utilities and severe housing cost burden as paying more than 50% of income for rent and utilities. Figure 182 shows the number of households at various income levels and the percent of total households at each income level with different rates of severe housing cost burden for Tarrant County in 2014 (U.S. Department of Housing and Urban Development: Office of Policy Development and Research, 2014). Sixty-seven percent of total households with incomes below 30% of HUD area median family income (HAMFI) spend more than 50% of their income on housing and utilities with both extremely low-income renters (70%) and owners (60%) experiencing severe housing cost burden.

Income by Cost Burden (Total Households)	# of Households Cost Burden > 50%	% Cost Burden > 50%	# of Households Cost burden > 30% to 50%	% Cost Burden >30% to 50%	# of Households Not Cost Burdened	% Households Not Cost Burdened	Total Households
Household Income <= 30% HAMFI	55,715	67%	10,840	13%	16,670	20%	83,225
Household Income >30% to <=50% HAMFI	22,945	30%	34,120	44%	20,550	26%	77,615
Household Income >50% to <=80% HAMFI	9,325	8%	39,265	35%	63,010	56%	111,600
Household Income >80% to <=100% HAMFI	1,775	3%	12,030	18%	52,455	79%	66,260
Household Income >100% HAMFI	2,450	1%	18,690	6%	307,525	94%	328,665
Total Households	92,210	14%	114,945	17%	460,210	69%	667,365
Income by Cost Burden (Renters only)							Total Renters
Household Income <= 30% HAMFI	40,440	70%	6,925	12%	10,405	18%	57,770
Household Income >30% to <=50% HAMFI	12,715	28%	24,900	55%	7,435	17%	45,050
Household Income >50% to <=80% HAMFI	2,685	5%	22,085	40%	31,010	56%	55,780
Household Income >80% to <=100% HAMFI	395	1%	3,730	13%	24,040	85%	28,165
Household Income >100% HAMFI	215	0%	2,380	3%	69,425	96%	72,020
Total Renter Households	56,450	22%	60,020	23%	142,310	55%	258,780
Income by Cost Burden (Owners only)							Total Owners
Household Income <= 30% HAMFI	15,280	60%	3,915	15%	6,260	25%	25,455
Household Income >30% to <=50% HAMFI	10,230	31%	9,220	28%	13,115	40%	32,565
Household Income >50% to <=80% HAMFI	6,635	12%	17,180	31%	32,005	57%	55,820
Household Income >80% to <=100% HAMFI	1,380	4%	8,300	22%	28,415	75%	38,095
Household Income >100% HAMFI	2,235	1%	16,305	6%	238,110	93%	256,650
Total Owner Households	35,760	9%	54,920	13%	317,905	78%	408,585

Figure 182: FWHS housing cost burden by income level, 2014 CHAS

Figure 183 displays the 2014 HUD area median family income (HAMFI) ranges at each level of income under 100% HAMFI along with the income that would be left for all living expenses, savings and emergencies after spending 30% of annual income on housing and utilities (U.S. Department of Housing and Urban Development: Office of Policy Development and Research, 2014). Households below 50% area median income have very little residual income to cover other living expenses (food, clothing, transportation, health care, etc.) after paying 30% of their income for affordable housing. Spending more than 30% on housing makes their situation even worse.

HUD Area Median Family Income (2014)	Annual income ranges	Maximum residual income if 30% spent on housing
Household Income <= 30% HAMFI	\$0 to \$19,740	\$13,818
Household Income >30% to <=50% HAMFI	\$19,741 to \$32,900	\$23,030
Household Income >50% to <=80% HAMFI	\$32,901 to \$52,640	\$36,848
Household Income >80% to <=100% HAMFI	\$52,641 to \$65,800	\$46,060

Figure 183: Tarrant County 2014 HAMFI ranges with residual income if 30% spent on housing and utilities (HUD 2014)

Black and Hispanic households make up a disproportionate share of households at less than 30% of HAMFI. While only 20% of Fort Worth households were black in 2015, 34% of extremely low-income households were black (Figure 184). High cost burdens at extremely low incomes disproportionately affect black and Hispanic households.

Figure 185 displays the information in Figure 182 in graphic form. Households that are not cost burdened (spend 30% or less of their income on housing and utilities) are shown in green with households spending more than 30% and up to 50% in yellow, and those spending more than 50% of their income in red. More renters with incomes at 50% or below median income spend more than 50% of their incomes on housing and utilities as indicated by the red and yellow bars in Figure 185 than any other group. The rate of households that are housing cost burdened decreases as income increases while households with incomes below 50% HAMFI experience the greatest rates of housing cost burden.

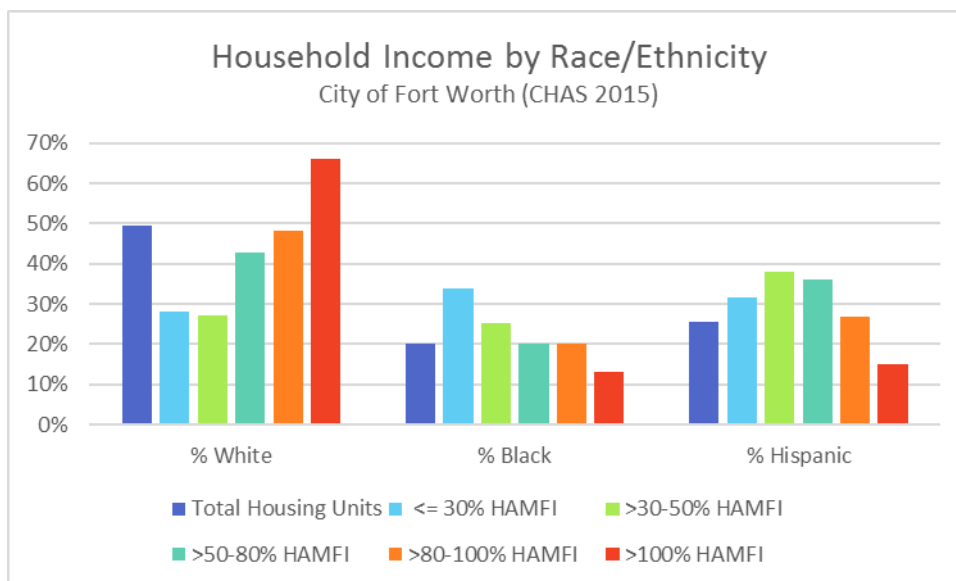


Figure 184: Percent of households at various income brackets by race and ethnicity (CHAS 2015)



Figure 185: Tarrant County - Housing cost burden by household income (CHAS 2014)

b.

The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

Eligibility

Eligibility criteria can systematically exclude persons with certain life experiences. Persons with the following characteristics are ineligible for housing and a court conviction is not required as evidence of criminal activity¹⁷ (Fort Worth Housing Solutions, 2017):

- Registered sex offenders
- Persons who have produced methamphetamine on housing authority premises
- Persons who have committed murder, kidnapping, indecency with a child, rape or crimes of sexual assault or arson
- Current abusers of alcohol or illegal drugs
- Persons committing manslaughter, robbery, illegal weapons possession, assault, physical violence to persons or property (conviction not required as evidence) within the last five years, including less than three years following incarceration

FWHS administrators advise that their policies are more flexible and less restrictive in practice than HCV landlord policies for eligibility, but 18% of applicants who were invited to an initial

¹⁷ FWHS policy allows for special programs that allow significant exceptions to the SEDACA policy to engage persons with high barriers to housing such as criminal backgrounds, substance use disorders and chronic homelessness (Mitchell S., Vice President, Assisted Housing, FWHS, 2018). These programs generally provide case management and other supportive services.

FWHS interview and briefing did not pass the FWHS criminal background screening during its most recent assessment of applicants (Mitchell & Lemons, 2017; Fort Worth Housing Solutions, 2018). HCV applicants must meet both the FWHS requirements as well as any eligibility requirements of landlords. Participants in public participation stated that any criminal background findings, history of evictions or failure to provide evidence that income is three times rent are used by landlords to restrict persons from renting with and without housing assistance. A public housing participant in an FWHS focus group stated that landlords preferred HCV applicants with no income and did not accept her application because she worked and would be responsible for a significant portion of the rent. Persons with a history of evictions, including those resulting from escape from domestic violence, are screened out for eligibility to rent by landlords, even in LIHTC properties (Dillard, 2017). An attendee at an FWHS public meeting who works in property management at an LIHTC property said that they do not offer “second chance” housing opportunities and will not accept applicants with an eviction in the last five years or criminal backgrounds, including possession of marijuana or writing bad checks. Texas courts recorded 478,294 civil cases relating to tenant/landlord matters in 2017 or the equivalent of 5% of all Texas households (Texas Office of Court Administration, 2017). Half of all civil cases filed related to landlord/tenant issues. FWHS planned to conduct a major review and revision of its Screening and Eviction for Drug Abuse and Criminal Activity (SEDACA) policy in October 2017.

Homelessness

The 2018 annual homeless Point-in-Time count for Tarrant and Parker counties found a 5% increase in the number of people homeless from 2017, with the greatest increase in the number of unsheltered persons (UN, 74%) as shown in Figure 186 (Tarrant County Homeless Coalition, 2018).

Location	UN	ES	SH	TH	Percent of Total	2018 Total	2017 Total	Annual Change
Fort Worth	604	1,074	20	89	89%	1,787	1,594	+12%
Arlington	53	154	0	0	10%	207	252	-18%
Parker County	8	0	0	0	.4%	8	12	-33%
NE Tarrant	13	0	0	0	.6%	13	66	-80%
Total	678	1,228	20	89	100%	2015	1,924	+5%

Figure 186: Annual change in number of persons homeless by type of shelter for UN (unsheltered), ES (emergency sheltered), SH (safe haven for persons with severe mental illness), TH (transitional housing) (TCHC Point-in-Time count, 2018)

The homeless population included all demographic categories in the community at rates comparable to the rates in the larger community and grew at approximately the same rate as the overall population (Tarrant County Homeless Coalition, 2018). Over 10,000 persons used emergency shelter in Tarrant County in 2017. Emergency shelters users were disproportionately black (55%). The number of persons chronically homeless increased by 29%, possibly due to low turnover in available permanent supportive housing beds (1,733) and fewer affordable housing options (Tarrant County Homeless Coalition, 2018). Persons in the Tarrant County Continuum of Care programs for homelessness averaged seven months homeless overall and 16% returned to homelessness within two years after housing.

City of Fort Worth Analysis of Impediments (2014)

The City of Fort Worth conducted an Analysis of Impediments, which identified the following disproportionate housing needs (Western Economic Services, LLC, 2014):

- Racial and ethnic minorities were disproportionately engaged in subprime loans and disproportionately received high annual percentage rate loans, especially Native American, black and Hispanic applicants
- Disproportionately high home mortgage denial rates for black, Hispanic and Native American applicants
- Persons living in low-income areas and areas with higher concentrations of minorities reported inadequate code enforcement of housing ordinances (crowding)

Contributing Factors of Disproportionate Housing Needs

Summary

Of the more 300 comments and votes associated with disproportionate housing need received during public participation, over 60% were directed at **economic pressures** affecting access to housing. These contributing factors included:

- Increasing property values and taxes making home ownership unaffordable and driving up rents
- Unaffordable home and rental prices, rapidly rising rents
- Investors pushing up prices and eliminating previously affordable housing
- Barriers to home ownership, including difficulty obtaining a mortgage or funds for down payment
- Tight rental market (low vacancy rates) driving up rents
- New construction product types directed at upper middle and upper income households and lack of products for households needing smaller or less expensive units

Approximately 30% of the public comments received identified physical **housing problems** as significantly contributing to disproportionate housing needs. CFW survey comments concerning housing problems included:

- Poor condition of older housing stock, lack of maintenance and repair
- Seller's market – sellers don't make needed repairs prior to sale
- Landlords/owners failing to maintain property in affordable housing

Over 50 comments were made concerning **lack of public investments** in specific communities. These comments and votes were primarily associated with perceived lack of police protection, rising crime rates and the perception that areas with affordable housing were not safe and had significantly higher rates of crime. Concerns about lack of police protection came particularly from respondents in far north Fort Worth and southeast Fort Worth.

Housing Problems

A 2016 presentation by the Fort Worth Planning Department supports comments received concerning housing problems. The presentation launched the City's Neighborhood Profile Areas, now in use to target investments of resources and services to distressed communities. The median age of housing stock in Fort Worth is 33 years. Much older housing is concentrated in the central city and coincides with many of Fort Worth's racially and ethnically concentrated areas of poverty. The housing stock in these areas is over 65 years old. Figure 187 shows concentrations of homes built in the 1950s or earlier on the north side and in southeast Fort Worth.

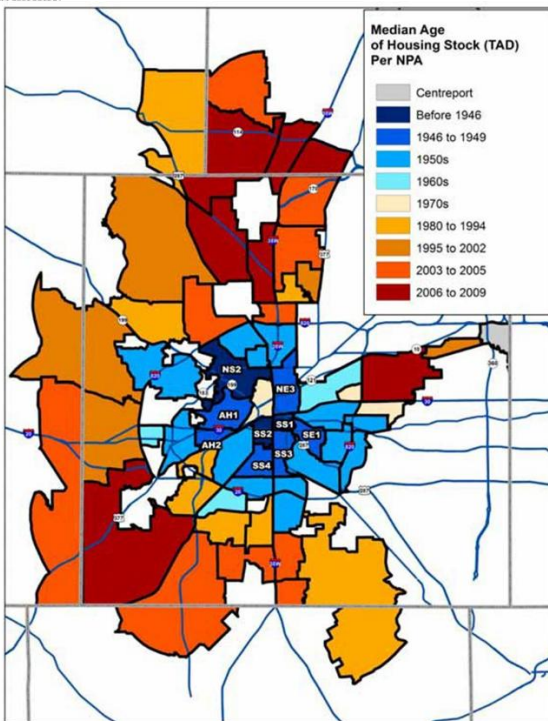


Figure 187: Age of Fort Worth housing stock by year built, CFW 2016

Vacant housing units cluster in R/ECAP areas with rates in north Fort Worth ranging from 18% to 31%, with higher concentrations of limited English proficiency and Hispanic residents and rates in southeast Fort Worth and other high-poverty areas ranging from 13% to 31% (ACS 2014 data). Figure 188 displays the locations of vacant housing units as a percent of total housing units. These units may be in too great disrepair to be affordably occupied. Participants in public participation said that, while older homes might be affordable to purchase, they are not affordable to repair. Participants said sellers were not motivated to make repairs prior to sale based on the hot housing market and typically selling “as is”, leaving the buyer with overwhelming structural and systems renovations to make the home habitable.

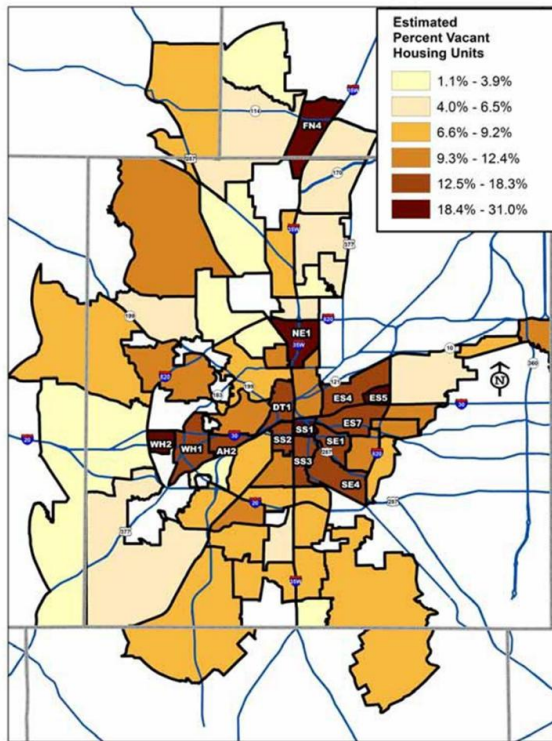


Figure 188: Vacant housing units as a percent of all housing units by neighborhood, CFW 2014

Property value data (Tarrant Appraisal District, 2014-2015) is also consistent with the poor condition of the single-family, owner-occupied housing stock in high-poverty areas such as southeast Fort Worth where values of single-family homes fall below \$35,000. Figure 189 displays the Tarrant Appraisal District valuations of single-family, owner-occupied housing. The average Fort Worth single-family home value in 2015 was \$135,420. Property values increased overall by over 5% from 2014 to 2015, a trend that continues and is comparable for multifamily properties. Many comments related to the challenges to affordability created by rising property values and taxes, especially for persons on fixed incomes or in jobs with stagnant low wage growth.

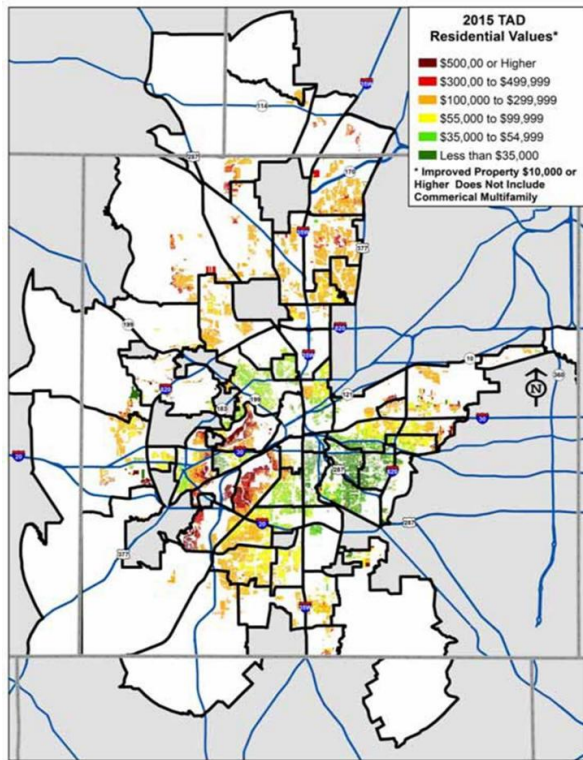


Figure 189: 2015 appraised values of single-family, owner-occupied housing, 2015 TAD

The City of Fort Worth received nearly 1,500 complaints about substandard structures in 2015. These complaints were highly concentrated in areas with older housing stock, lower property values, vacant housing structures and concentrated poverty, especially in southeast Fort Worth. Figure 190 displays the locations of complaints received by neighborhood.

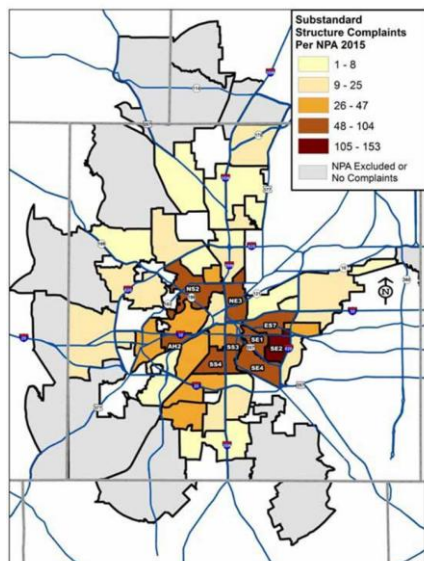


Figure 190: Complaints for substandard structures, CFW Code Compliance, 2015

C. Publicly Supported Housing Analysis

a. 1. Analysis

Publicly Supported Housing Demographics

i

Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments and Housing Choice Voucher in the jurisdiction?)

For the purpose of this section and following HUD's methodology, publicly supported housing programs are grouped into four categories: Public Housing, Project-Based Section 8, the Housing Choice Voucher program and Other Multifamily, which includes Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities.

More than 10,000 households lived in publicly supported housing units in 2013, which represented close to 3.8% of Fort Worth's 261,063 households. Black households represented the largest group (7,000 households) living in publicly supported housing, followed by white (1,863), Hispanic (1,089) and Asian/PI (79) households. Black households represented a majority in Public Housing, Project Based Section 8 and the Housing Choice Voucher program while white households represented the majority in Other Multifamily Housing. The majority of Asian/PI households resided in Project-Based Section 8 units.

City of Fort Worth	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	57	6.24%	744	81.40%	106	11.60%	7	0.77%
Project-Based Section 8	654	32.01%	948	46.40%	399	19.53%	40	1.96%
Other Multifamily	238	60.56%	110	27.99%	39	9.92%	5	1.27%
HCV Program	914	13.66%	5,198	77.69%	545	8.15%	27	0.40%

Figure 191: Publicly supported housing program and race/ethnicity, Fort Worth (HUD Table 6, IMS/PIC, TRACS, 2013)

Dallas-Fort Worth-Arlington Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	326	7.49%	3,515	80.75%	434	9.97%	76	1.75%
Project-Based Section 8	1,827	26.07%	3,507	50.04%	1,165	16.62%	474	6.76%
Other Multifamily	623	45.98%	333	24.58%	181	13.36%	209	15.42%
HCV Program (Local data)*	4,679	16.60%	22,827	80.96%	1,738	6.16%	608	2.16%

Figure 192: Housing type and Race/Ethnicity, the Region (HUD Table 6, IMS/PIC, TRACS, 2013) *HCV race/ethnicity not mutually exclusive.

ii

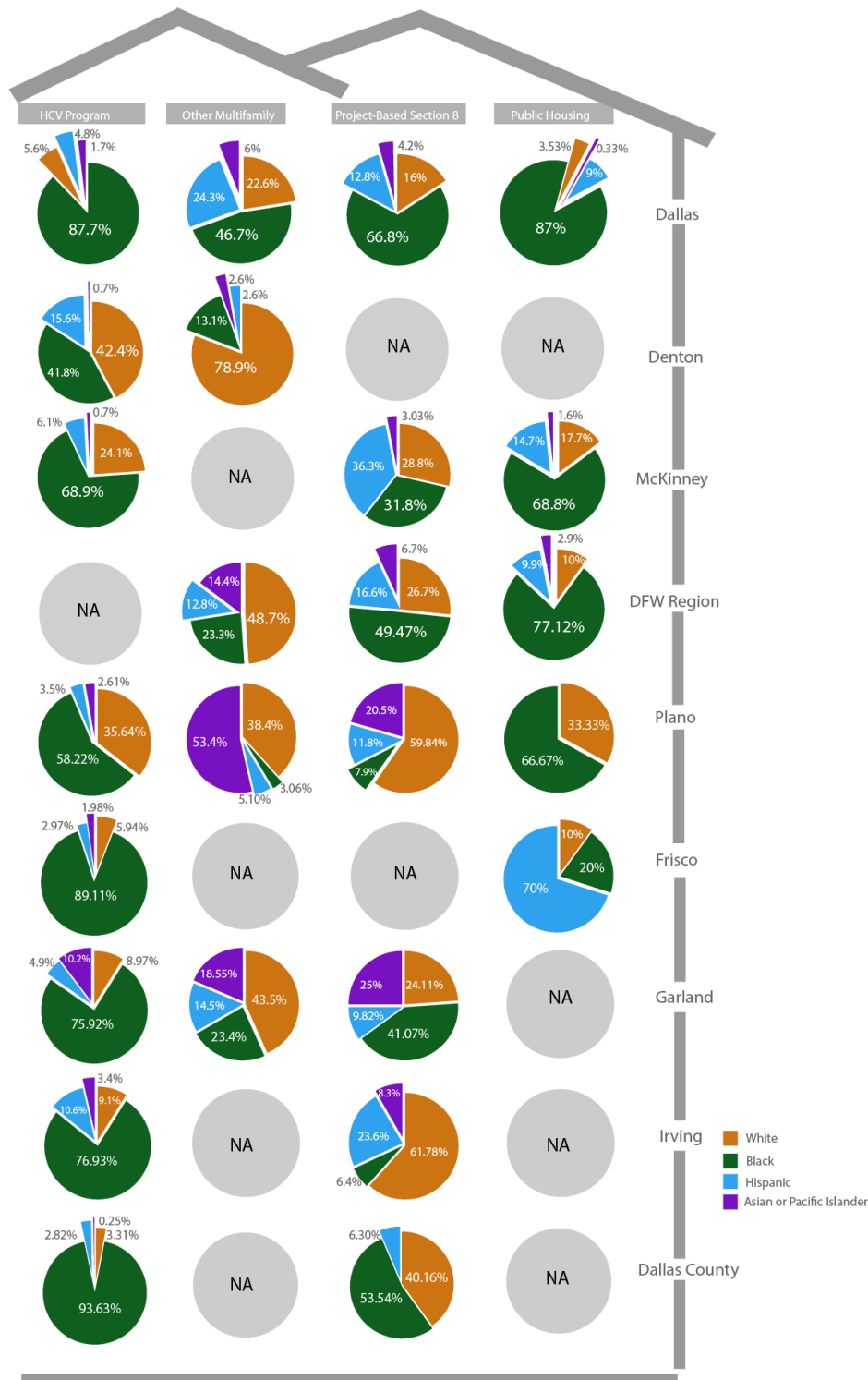
Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

The following comparative racial/ethnic demographic portraits of each program at the jurisdictional and regional levels rely primarily on HUD-provided data. The racial and ethnic composition of each housing program varies significantly across the region (Figure 193).

More than 40,000 households lived in publicly supported housing units in the region (Figure 192), which represented almost 2% of the region's households (2,291,614 households). In Fort Worth

and the region, black households resided in publicly supported housing units at rates (70% and 74%) significantly greater than their presence in the overall population (18% and 15%). Hispanic residents used publicly supported housing (City 11%, region 9%) significantly less than their representation in the general population (City 25%, region 20%).

The proportion of each racial and ethnic group using public housing was very similar in Fort Worth and in the region (within 2 percentage points). The proportions of households in Project-based Section 8 housing who are white and Hispanic was greater in Fort Worth (32% and 20%) than in the region (26% and 17%). The proportions of households using Project-based Section 8 housing who are black and Asian/PI in Fort Worth (46% and 2%) was less than in the region (50% and 7%). The proportions of households in other multi-family housing programs who are white and black was greater in Fort Worth (61% and 28%) than in the region (46% and 25%). The proportions of households using other multi-family housing programs who are Hispanic and Asian/PI was less in Fort Worth (10% and 1%) than in the region (13% and 15%). The proportion of households using HCVs who are Hispanic in Fort Worth (8%) is greater than in the region (6%). The proportion of households using HCVs who are white, Black and Asian/PI in Fort Worth is less than in the region.



Housing Types and Race/Ethnicity

Source: U.S. Census Bureau, Decennial Census, APSH, CHAS

Figure 193: Housing programs by race and ethnicity of participants, selected jurisdictions, (HUD IMS/PIC, TRACS 2013)

iii.

Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted and HCV) to the population in general and to persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Race/Ethnicity and Income Eligibility

The HUD-provided table as shown in Figure 194 includes racial/ethnic data for the total population in the jurisdiction and for persons meeting the income eligibility requirements for publicly supported housing programs. NTRHA adds three rows. One row includes the aggregate percentage of income-eligible households (0-80% AMI) for each racial/ethnic group. A second row captures program participation rates, which is the percentage of participants in publicly supported housing program based on total income eligible population for each racial/ethnic group. The final row identifies the total proportion of each racial and ethnic group in all publicly supported housing programs combined.

The table shows that white households account for 50% of all Fort Worth households. Hispanic households represent 25% of all Fort Worth households, black households account for 20%, and Asian/PI households represent 3%. Regionally, white households account for 58% of all households, Hispanic households represent 20%, black households account for 16% and Asian/PI households represent 5%. The racial/ethnic composition of publicly supported housing programs in Fort Worth differs slightly from the region. The share of white (18%) and black (70%) households residing in publicly supported housing in Fort Worth remains similar to the regional proportions (respectively 18% and 71%). The proportion of Hispanic households (11%) appears higher in Fort Worth than in the region (8%) and Asian/PI (0.8%) households appear lower in Fort Worth than in the region (3%). In Fort Worth, the white population represents a greater proportion of the Project-Based Section 8 and Other Multifamily programs. The black population represents a greater proportion of the Public Housing and HCV programs. These trends appear similar at the regional level.

In Fort Worth, over 63% of Hispanic households, 60% of black households, 39% of Asian/PI households and 30% of white households have income eligibility. About 22% of income eligible black households participate in publicly supported housing programs, primarily using the HCV program. While 63% of Hispanic households pass the income eligibility requirement, only 2.5% of income eligible households reside in publicly supported housing units, primarily in the HCV program. Similarly, while 39% of Asian/PI households meet the income eligibility requirement, only about 2.5% participate in publicly supported housing programs. Finally, 5% of income eligible white households live in publicly supported housing and primarily receive assistance through the HCV program. In the region, all races and ethnicities have lower eligibility rates than Fort Worth. For example, over 61% of Hispanic households have income eligibility regionally. Regionally, over 55% of black households were eligible for assistance based on income. The income eligibility was 27% for the white population and 33% for the Asian/PI population. With the exception of Asian/PI households, Fort Worth had greater participation rates of income eligible households than the region.

	Race/Ethnicity							
Fort Worth	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	57	6.24%	744	81.40%	106	11.60%	7	0.77%
Project-Based Section 8	654	32.01%	948	46.40%	399	19.53%	40	1.96%
Other Multifamily	238	60.56%	110	27.99%	39	9.92%	5	1.27%
HCV Program	914	13.66%	5,198	77.69%	545	8.15%	27	0.40%
Total From all Programs	1,863	18.57%	7,000	69.78%	1,089	10.86%	79	0.79%
Total Households	133,655	50.40%	52,649	19.85%	66,749	25%	8,010	3.02%
0-30% of AMI	12,230	29.75%	13,700	33.32%	12,725	30.95%	1,695	4.12%
0-50% of AMI	20,385	26.94%	22,330	29.51%	26,260	34.71%	2,430	3.21%
0-80% of AMI	40,070	32.82%	31,784	26.04%	42,240	34.60%	3,160	2.59%
Percentage Income Eligible within race		29.98%		60.37%		63.28%		39.45%
Participation Rate based on Income Eligible Population		4.65%		22.02%		2.58%		2.50%
Dallas-Fort Worth-Arlington	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	326	7.49%	3,515	80.75%	434	9.97%	76	1.75%
Project-Based Section 8	1,827	26.07%	3,507	50.04%	1,165	16.62%	474	6.76%
Other Multifamily	623	45.98%	333	24.58%	181	13.36%	209	15.42%
HCV Program (Local Data)	4,679	16.60%	22,827	80.96%	1,738	6.16%	608	2.16%
Total From all Programs	7,455	18.24%	30,182	73.86%	3,518	8.61%	1,367	3.35%
Total Households	1,348,425	57.78%	362,115	15.52%	466,931	20.01%	114,143	4.89%
0-30% of AMI	104,295	37.22%	77,243	27.57%	79,215	28.27%	13,070	4.66%
0-50% of AMI	179,100	32.49%	129,423	23.47%	173,909	31.54%	23,463	4.26%
0-80% of AMI	363,800	38.65%	199,927	21.24%	286,859	30.48%	38,118	4.05%
Percentage Income Eligible within race		26.98%		55.21%		61.43%		33.39%
Participation Rate based on Income Eligible Population		2.05%		15.10%		1.23%		3.59%

Figure 194: Race/ethnicity for the total population and for persons meeting the income eligibility requirements for publicly supported housing programs, Fort Worth, DFW, NTRHA (HCV) (HUD IMS/PIC, TRACS 2016, LIHTC, 2014 with NTRHA HCV 2017)

Publicly Supported Housing Location and Occupancy

- i. **Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.**

The following maps respectively show segregation patterns (white/non-white) in the jurisdiction of FWHS for the year 2015 (Figure 195), as well as the location of publicly supported housing in 2013 (Figure 196). The segregation map shows census tracts that differ from the overall racial/ethnic composition of the area. For further explanation on the methodology of the segregation maps discussed below, refer to the appendix.

Overall, the majority of publicly supported housing programs appear to be located in areas with greater levels of non-white segregation. Most Project-Based Section 8 units appear in areas with a share of non-white residents at least 20% greater than the region average. Low Income Housing Tax Credit developments have a more balanced spatial distribution and appear in areas with greater concentrations of white residents as well as areas of segregation. HCV users appear more pronounced in census tracts with greater levels of non-white segregation. Public Housing units tend to be located in areas with greater levels of segregation.

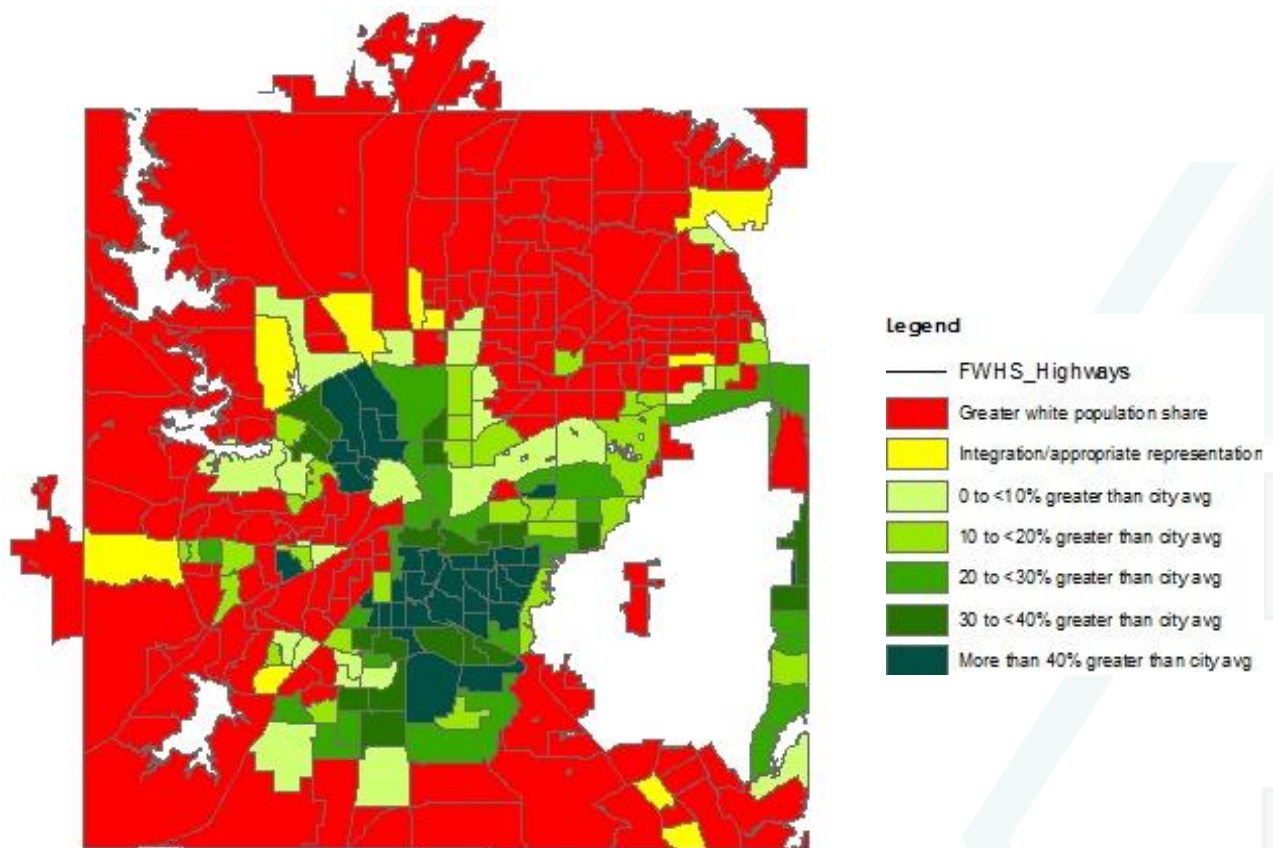


Figure 195: White/non-white segregation FWHS jurisdiction (ACS 2015)

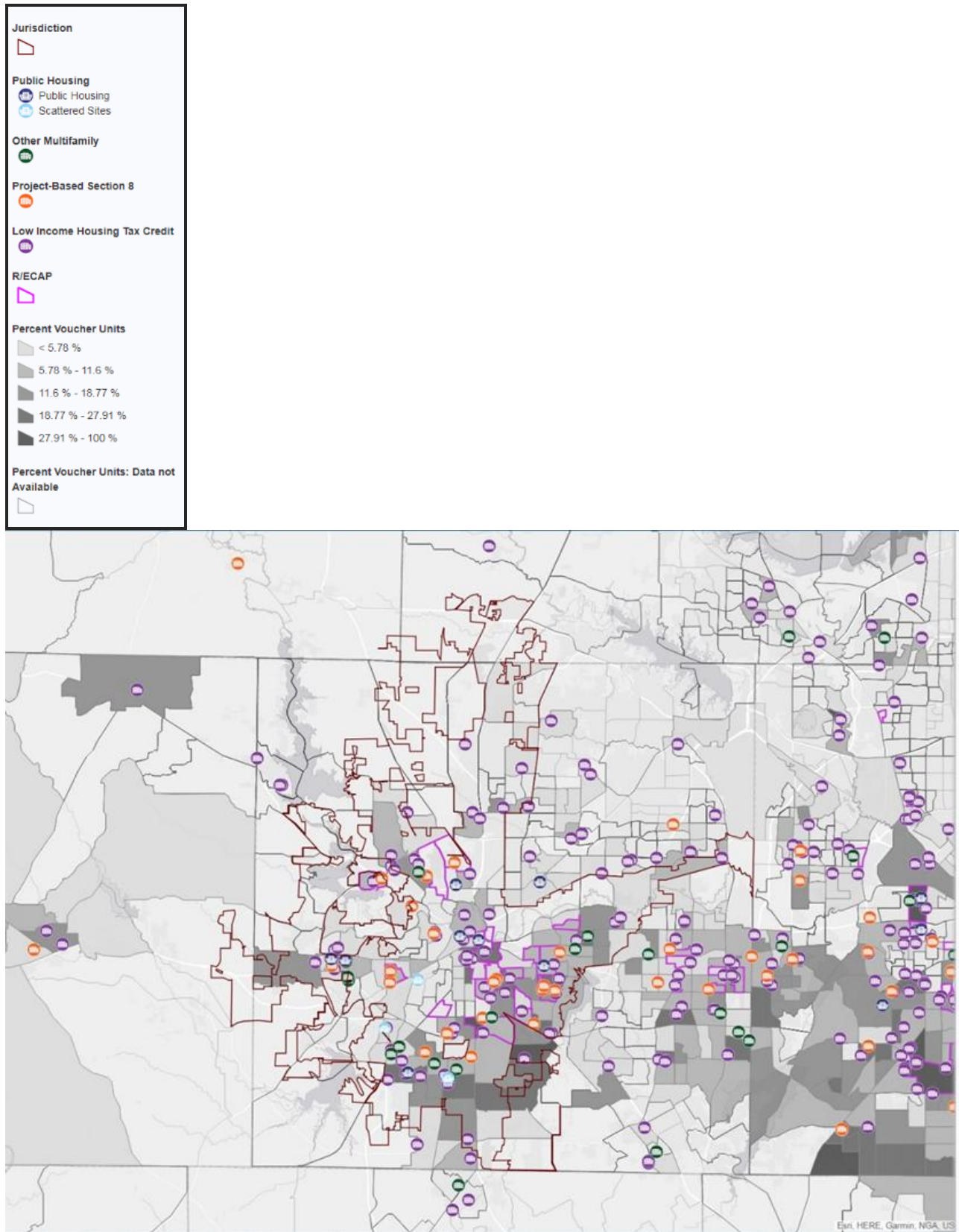


Figure 196: Locations of publicly supported housing projects, Fort Worth (HUD 2013)

Figure 197 displays the total number of HCVs located in each census tract in Fort Worth from participating NTRHA housing authorities in 2017. Census tracts colored dark green have no HCVs. Three census tracts contain more than 200 HCVs. The majority of census tracts include one to 50 HCVs. Census tracts meeting the criteria for R/ECAP are highlighted with blue boundaries. More than half of the 2016 R/ECAPs include less than 50 vouchers. Four census tracts include 50 to 100 vouchers. One R/ECAP includes 130 vouchers in the Las Vegas Trail area and one includes more than 200 vouchers in far east Fort Worth. Very few vouchers are in use in northeast and southwest Fort Worth. HCVs tend to be concentrated in southeast Fort Worth, far east, far south and northwest Fort Worth.

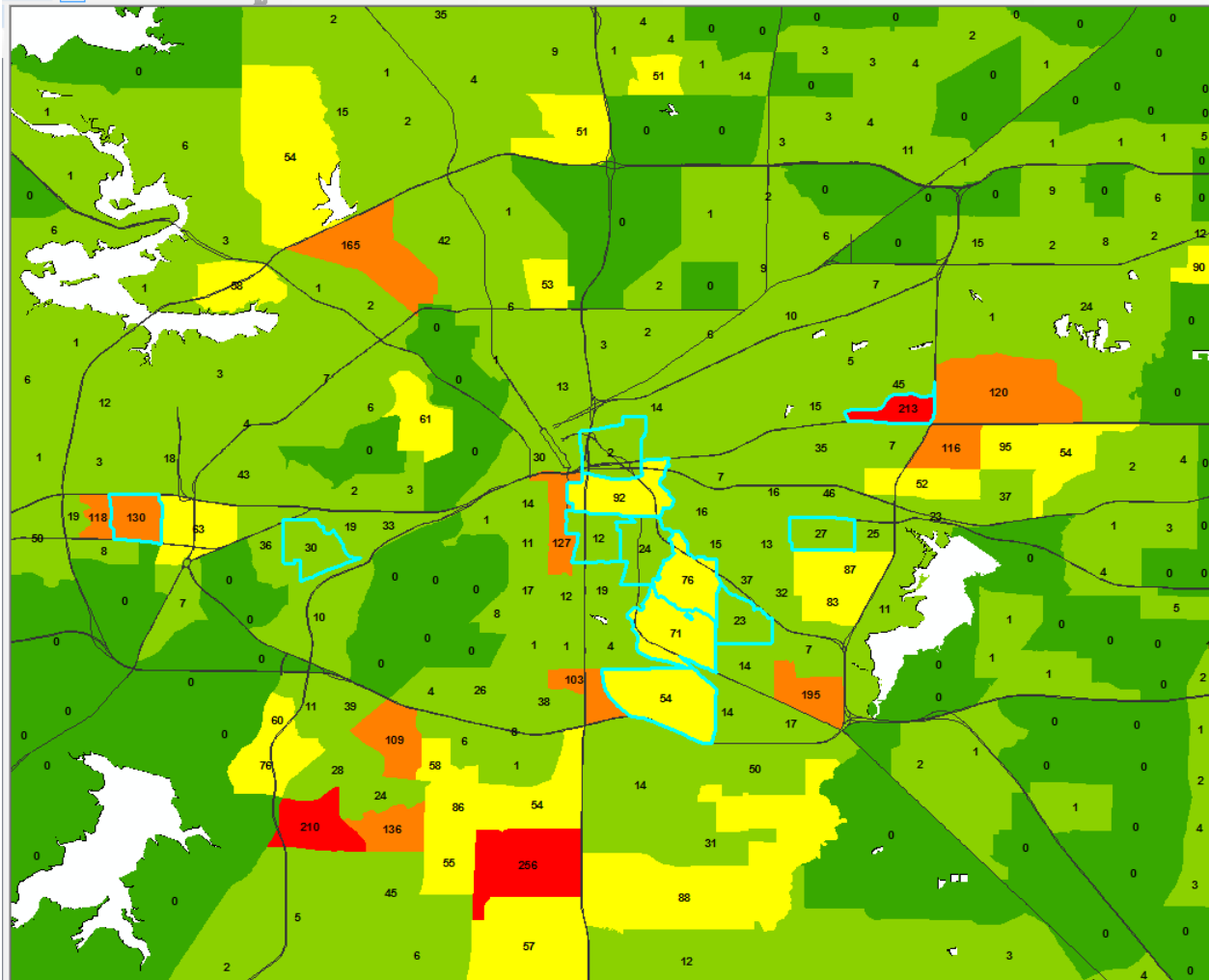
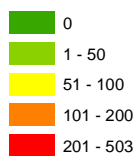


Figure 197: Number of HCVs per census tract, FWHS jurisdiction (NTRHA 2017) with 2016 R/ECAPs



ii.

Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

Figure 198 shows the locations of publicly supported housing in Fort Worth based on information provided by HUD. Properties serving significant numbers of families are shown in green and located in all areas except northwest Fort Worth. The majority of family properties are in south Fort Worth. Properties serving seniors and persons with disabilities, pictured in blue, are primarily located in West Fort Worth.

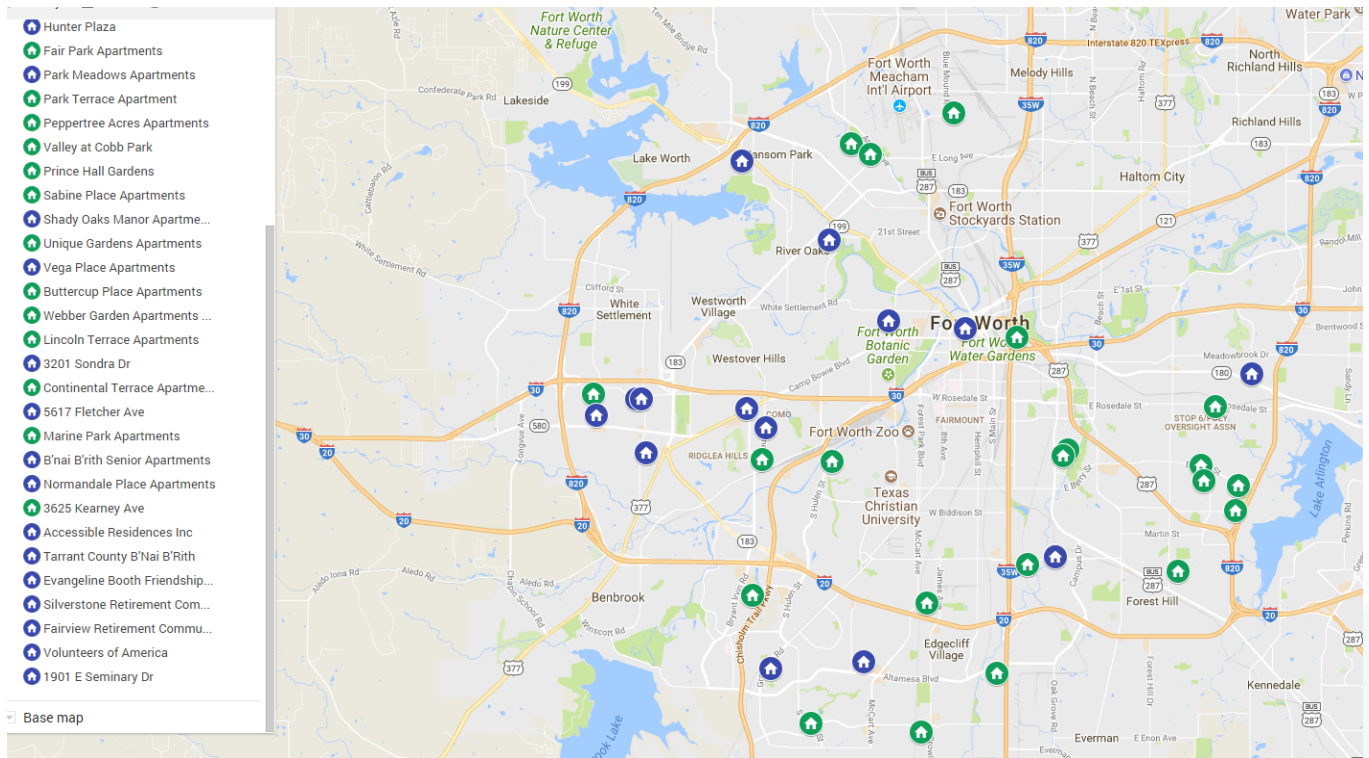


Figure 198: Fort Worth publicly supported housing developments for families (green) and seniors (blue) (HUD IMS/PIC, TRACS 2016, LIHTC 2014)

Figure 199 displays demographic characteristics of selected publicly supported housing developments in Fort Worth (U.S. Department of Housing and Urban Development, 2013). Developments shaded in red are located in 2016 R/ECAPs. Significant variations in occupancy characteristics exist for the following protected classes:

- Black residents are significantly less likely to live in public housing and other types of affordable housing in southwest Fort Worth than in other parts of Fort Worth, such as Candletree (74% black), Overton Park (65%), Sycamore Center Villas (68%) and Villas at Oak Hill, formerly known as Stonegate (44%). Black residents were more highly concentrated in the traditional, legacy public housing communities of Butler (81% black) and Cavile (88%) with some exceptions such as Wind River (94% black) located in far west Fort Worth in the Las Vegas Trail community. Southwest Fort Worth is generally higher income with fewer concentrations of minority residents. Hispanic residents were significantly more likely to live in these southwest Fort Worth developments than in other developments.

- Developments located in R/ECAPs are much more likely to have a higher concentration of black residents. The average percent black in R/ECAP developments is 66% in 2016 but declined from 70% in 2015. Properties in non-R/ECAPs average 43% black residents.
- Developments located in a 2016 R/ECAP average 69% families with children while developments not located in R/ECAPs average 53% families with children. Only 14 of the 28 developments not located in R/ECAPs have more than 6% families with children (50%) while 82% of the developments located in R/ECAPs serve primarily families with children.

Certain developments differ in the primary race or ethnicity of their residents:

- Silverstone Retirement Community, the only senior affordable housing community located in a R/ECAP, has residents who are predominantly white (79%). Silverstone is run by PRS, founded by a collaboration of Protestant churches. Lake Como Community is the only other senior property located in a R/ECAP.
- Fair Park, an FWHS property also located in a R/ECAP, is 35% Hispanic in its occupancy while similar properties range from 0% to 13% Hispanic. The surrounding census tract has only 14% Hispanic residents (U.S. Department of Housing and Urban Development, 2015).
- Three properties in R/ECAP census tracts have from 10% to 13% Asian residents, Prince Hall I and II and Park Terrace Apartments. These three properties are located within 1,000 feet of each other. Similar properties in other census tracts have a much lower presence of Asian residents.
- Seven of the 28 developments not located in R/ECAPs have very low percentages of black residents, 2%-14%. These properties are all on the west side.
- Hispanic residents of developments that are not in R/ECAPs concentrate in northwest Fort Worth, including Sabine Place (82% Hispanic) and Marine Park (73% Hispanic).
- Two developments not located in R/ECAPs have significant numbers of Asian residents - Sycamore Center Villas (8%) in far south Fort Worth and Hunter Plaza (6%) downtown.

Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Public Housing						
Butler Place Apartments	412	5%	81%	13%	0%	68%
Cavile Place Apartments	299	2%	88%	9%	1%	71%
Butler Place Apartments	17	8%	92%	0%	N/a	69%
Cambridge Courts	33	16%	77%	6%	N/a	45%
Overton Park	54	22%	65%	13%	N/a	45%
Sycamore Center Villas	47	2%	68%	23%	8%	88%
Villas of Oak Hill/FKA Stonegate	58	30%	44%	26%	N/a	47%
Candletree Apartments	44	12%	74%	9%	5%	49%
Wind River	34	3%	94%	3%	N/a	61%
Project-Based Section 8						
Fair Oaks	76	50%	42%	8%	N/a	N/a
Hunter Plaza	25	24%	59%	12%	6%	6%
Fair Park	48	4%	59%	35%	2%	81%
Park Meadows Apartments	79	37%	52%	11%	N/a	N/a
Park Terrace Apartments	124	30%	59%	1%	10%	71%
Peppertree Acres	148	7%	51%	42%	N/a	83%
Pilgrim Valley Manor Apartments	168	4%	86%	10%	1%	67%
Prince Hall Gardens I	100	7%	77%	3%	13%	80%
Sabine Place Apartments	71	15%	3%	82%	N/a	82%
Shady Oaks Manor	138	71%	4%	24%	N/a	1%
Unique Gardens	134	19%	80%	1%	N/a	58%
Vega Place	100	57%	19%	24%	N/a	1%
Residences At Stalcup (fka Buttercup)	90	0%	99%	1%	N/a	62%
Webber Gardens Apts.	120	6%	86%	5%	3%	77%
Lincoln Terrace Aka Villas On The Hill	70	1%	88%	6%	4%	59%
Prince Hall Garden II	76	59%	30%	0%	10%	68%
Casa, Inc.	200	61%	11%	25%	2%	N/a
Continental Terrace aka Times Square	62	11%	68%	19%	2%	48%
Lake Como Community Of Hope	40	31%	64%	3%	3%	N/a
Marine Park Apts.	82	12%	16%	73%	N/a	61%
B'nai B'rith Senior Citizens Housing	60	86%	7%	7%	N/a	N/a
Normandale Place Apartments	73	76%	17%	7%	N/a	N/a
Northhill Manor Apartments	100	55%	2%	43%	N/a	81%
Other Multifamily Assisted Housing						
Accessible Residences, Inc.	20	58%	26%	16%	N/a	N/a
Tarrant County B'nai B'rith	59	71%	14%	14%	N/a	N/a
Evangeline Booth Friendship	119	44%	42%	13%	1%	N/a
Silverstone Retirement Community	59	79%	14%	2%	4%	N/a
Fairview Retirement Community	40	77%	14%	5%	2%	N/a
VOA Texas Calmont Place	18	78%	22%	0%	N/a	N/a
Catherine Booth Friendship House	96	48%	37%	12%	3%	N/a

Figure 199: Demographic characteristics of selected publicly supported residential properties in Fort Worth (HUD Table 8, IMS/PID, TRACS, 2016; LIHTC 2014) (Blue=senior/disability housing, Orange=R/ECAPs, ACS 2016)

iii

How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

R/ECAP tracts (73%) contain a substantially higher proportion of **Public Housing** units than non-R/ECAP tracts (27%). R/ECAP tracts show greater concentrations of black households and families with children than do non-R/ECAP tracts. Non-R/ECAP tracts contain greater concentrations of white and Asian/PI households. Non-R/ECAP tracts also hold a greater proportion of elderly individuals and persons with disabilities.

The HUD-provided table shows that more **Project-Based Section 8** units are located in non-R/ECAP tracts (55%) than in R/ECAP tracts (45%). Similarly, more **HCV** families reside in non-R/ECAP tracts (85%). For both housing programs, the proportion of black households is higher in R/ECAP tracts; correspondingly, the proportions of white and Hispanic households remain higher in non-R/ECAP tracts. For the **Project-based Section 8** program, R/ECAP tracts contain a greater proportion of families with children while for the **HCV** program, non-R/ECAP tracts house a greater proportion of families with children.

The concentration of elderly remains lower in R/ECAP tracts for the Project-based Section 8 program but appears higher in R/ECAP tracts for the HCV program. As for the concentration of persons with disabilities, the numbers remain comparable across R/ECAP and non-R/ECAP tracts for both the HCV and Project-based Section 8 programs.

Fort Worth	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	690	3.69%	84.66%	11.36%	0.29%	69.10%	9.04%	15.60%
Non R/ECAP tracts	253	13.56%	72.03%	12.29%	2.12%	55.02%	16.87%	26.91%
Project-based Section 8								
R/ECAP tracts	921	23.54%	58.12%	14.59%	3.65%	58.18%	24.05%	17.01%
Non R/ECAP tracts	1,140	38.75%	37.08%	23.46%	0.62%	33.68%	46.63%	16.84%
Other HUD Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	401	60.56%	27.99%	9.92%	1.27%	0.00%	81.19%	16.37%
HCV Program								
R/ECAP tracts	973	8.87%	85.15%	5.57%	0.41%	44.51%	21.75%	27.39%
Non R/ECAP tracts	5,503	14.87%	76.03%	8.57%	0.40%	49.91%	17.82%	25.04%

Figure 200: R/ECAP and non-R/ECAP demographics by publicly supported housing program category (HUD Table 7, IMS/PIC, TRACS, 2013)

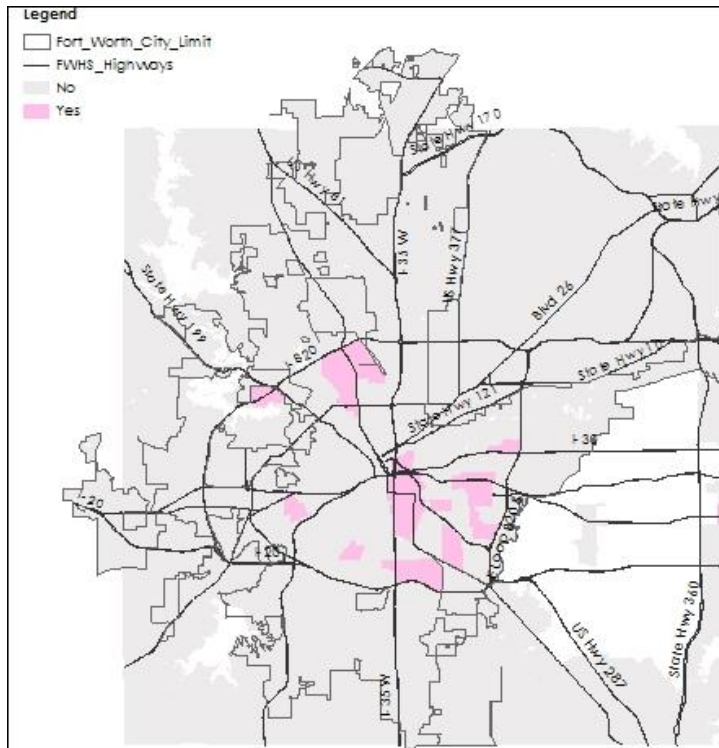


Figure 201: R/ECAP Map FWHS jurisdiction 2013

Analysis of **local HCV program data** (NTRHA) shows that an estimated 5,055 HCV families reside in Fort Worth and 5,562 families live in Tarrant County (excluding Arlington). An estimated 33% of the HCV families residing in Fort Worth live in R/ECAP census tracts. There are 2,246 HCV families with a head of household with a disability living in the Fort Worth, and about 35% of these families live in R/ECAP census tracts. An estimated 789 families have an elderly head of household, and 38% of elderly-led HCV families reside in R/ECAP areas. In Tarrant County, non-R/ECAP census tracts include an average of 14 HCV families per census tract, while R/ECAP census tracts have an average of 39 HCV families. In other words, R/ECAP census tracts in Tarrant County tend to include twice as many HCV families than a non-R/ECAP census tract.

As presented in the preceding sections and delineated in red in the map below (Figure 202), four areas in the region contain R/ECAPs. See the HUD-provided tables below for demographics of residents of publicly supported housing for Dallas and Fort Worth and R/ECAPs (Figure 203).

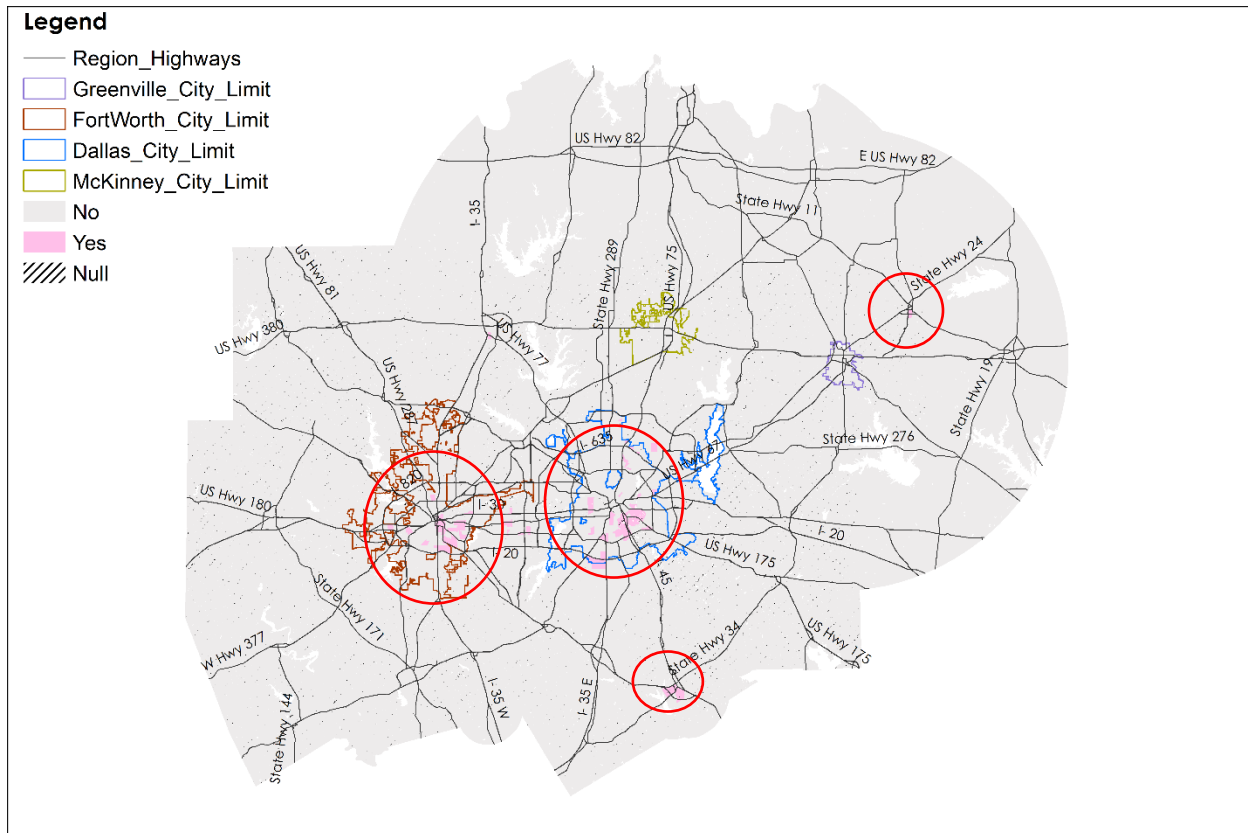


Figure 202: R/ECAPs in NTRHA region, ACS 2015

City of Dallas

Comparable proportions of **Public Housing** units appear in R/ECAP (50.3%) and non-R/ECAP census tracts (49.7%). Units in both R/ECAP and non-R/ECAP tracts show comparable demographic compositions in terms of race and ethnicity. However, units in R/ECAP tracts tend to be occupied by a slightly higher percentage of both elderly individuals and persons with disabilities.

A substantially higher proportion (71%) of **Project-Based Section 8** units are located in non-R/ECAP tracts as opposed to R/ECAP census tracts (29%). Units in R/ECAP tracts tend to be occupied by a considerably higher proportion of black households (87%) as well as by families with children (69%). Conversely, Project-Based Section 8 units in non-R/ECAP tracts, compared to R/ECAP tracts, tend to have a higher proportion of white households (20%), elderly individuals (46%) and persons with disabilities (25%).

With respect to **other multifamily housing**, a greater proportion of units (68%) are located in non-R/ECAP tracts. However, black households tend to reside in other multifamily housing located in R/ECAP tracts (65%) as opposed to non-R/ECAP tracts. This is also the case for Asian or Pacific Islander households and for elderly households.

Figure 203 shows that a higher proportion (68%) of HCV families reside in non-R/ECAP areas. The table further shows that the race/ethnic composition of R/ECAP tracts is comparable to non-R/ECAP tracts. Similar to the Public Housing program, a higher proportion of families with children and persons with disabilities live in non-R/ECAP tracts.

As presented in the preceding sections, **local data** has been gathered to supplement the HUD-provided data. A sample of 28,194 **HCV** families served by the participating jurisdictions in the North Texas Regional Housing Assessment has been assembled. A total of 27,743 HCV families have been successfully geo-located, enabling a finer spatial analysis of residential patterns. A total of 10,470 HCV families reside in the city of Dallas and 17,222 HCV families in Dallas County. About 34% of HCV families residing in the city of Dallas live in R/ECAP census tracts, and about 26% of HCV families residing in the Dallas County live in R/ECAP census tracts.

An estimated 4,642 heads of households with a disability reside in the City of Dallas, and about 36% of these HCV families reside in R/ECAP census tracts. An estimated 1,735 heads of households are elderly (65 and over), and about 31% of these HCV families live in R/ECAP areas.

In Dallas County, non- R/ECAP census tracts have an average concentration of 28 HCV families, while R/ECAP census tracts have an average of 100 HCV families. This indicates a disproportionate spatial concentration of HCV families in R/ECAP areas.

(Dallas, TX CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	1,376	3.15%	87.32%	9.46%	0.00%	44.53%	17.33%	34.66%
Non R/ECAP tracts	1,362	4.45%	86.13%	8.83%	0.59%	50.99%	14.53%	27.37%
Project-based Sect. 8								
R/ECAP tracts	947	6.13%	87.12%	5.11%	1.53%	68.64%	9.82%	6.77%
Non R/ECAP tracts	2,292	20.29%	58.00%	16.18%	5.35%	30.69%	46.05%	25.36%
Other HUD Multifamily								
R/ECAP tracts	117	1.74%	65.22%	19.13%	13.91%	0.00%	100.00%	4.24%
Non R/ECAP tracts	250	32.39%	38.06%	26.72%	2.43%	0.00%	89.62%	12.69%
HCV Program								
R/ECAP tracts	4,361	5.89%	88.71%	3.92%	1.47%	40.94%	28.74%	29.42%
Non R/ECAP tracts	9,379	5.49%	87.24%	5.22%	1.93%	44.02%	19.03%	25.49%

Figure 203: Demographics for protected classes of persons living in Dallas and Fort Worth publicly supported housing (HUD Table 7, IMS/PIC, TRACS, 2016; LIHTC 2014)

Other areas

HUD Table 7 "R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category" is unavailable for these areas. Relying on local knowledge and local data, an estimated 517 HCV families reside in Greenville, 45% of these families have a head of household with a disability, and 27% have an elderly head of household. There is one R/ECAP in Hunt County in 2015 in Commerce, which includes 37 HCV families. Non-R/ECAP areas have an average of 36 HCV families. An estimated 24 HCV families live in the City of Ennis. Five out of the seven families with a head of household with a disability live in a R/ECAP area. There is one R/ECAP area in Ellis County, including 17 HCV families. Non-R/ECAP areas have an average of two HCV families.

iv.
A.

Do any developments of public housing, properties converted under the RAD and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

Figure 204 updates the HUD data with current FWHS demographic information by housing assistance program (Fort Worth Housing Solutions, 2018). Housing Choice Voucher, traditional public housing and other affordable housing programs (including LIHTC and alternatively funded developments) are shown in comparison with the demographics of the FWHS jurisdiction (U.S. Census Bureau, 2016). Rows highlighted in red exceed the jurisdiction concentration for these characteristics. Participants in FWHS programs are more likely to have the following characteristics than the jurisdiction population at large:

- Female (85% to 87%)
- Black (72% to 82%)
- Persons with disabilities over age 61 (10% to 18%) and under age 62 (20% to 24%)
- Adults age 18-35 (28% to 50%) and 36-61 (38% to 50%)

Variations in participant demographics between programs are relatively small with the exception of the following:

- Black residents are more likely to live in traditional public housing (82%) than in other affordable housing (72%). (All FWHS public housing is approved for transition to other affordable housing types of programs through the RAD process.)
- Adults age 18-35 are more likely to participate in public housing programs (50%) than in either the HCV program (28%) or other affordable housing programs (39%).
- Adults age 36-61 are more likely to participate in the HCV program than in public housing programs (38%).
- Seniors (over age 61) are more likely to participate in the HCV program (22%) than in public housing programs.

Demographic Characteristics of Program Participants	HCV		Public Housing		Affordable Housing		FWHS Jurisdiction 2016
Male	574	13%	83	13%	42	15%	49%
Female	3,934	87%	559	87%	239	85%	51%
Black	3,527	78%	526	82%	202	72%	15%
White	935	21%	107	17%	70	25%	74%
Asian/PI	36	1%	6	1%	2	1%	5%
Native American	10	0.2%	2	0.3%	0	0%	1%
Hispanic	390	9%	83	13%	35	12%	21%
Disabled Over 61	832	18%	62	10%	40	14%	4%*
Disabled Under 62	1,101	24%	129	20%	68	24%	7%*
Age 18-35	1,272	28%	323	50%	109	39%	21%**
Age 36-61	2,241	50%	244	38%	119	42%	35%***
Age Over 61	995	22%	75	12%	53	19%	13%
Avg. income	\$ 12,745		\$ 9,604		\$13,553		
*Over/Under age 65, **Age 20 to 34, ***Age 35-61							

Figure 204: Demographics of participants in FWHS housing assistance programs, 2018

FWHS Affordable Housing properties

FWHS provided updated demographic information for properties managed by its in-house property management company, QuadCo, shown in Figure 205 (Smith, 2018)¹⁸. (The preceding analysis was conducted using HUD AFFH property data.) The following properties have demographics that significantly differ from other properties.

- Hometowne at Matador Ranch in far southwest Fort Worth is designated for seniors and 71% of its residents are female while other properties average 62% female. The City of Fort Worth funds senior citizens services at the property through its Consolidated Plan, including transportation and meals (City of Fort Worth: Neighborhood Services, 2017).
- Candletree and Villas on the Hill in southwest Fort Worth have significantly more black residents than other properties at 80% and 89% respectively. Villas on the Hill is located adjacent to the Lake Como community, a R/ECAP.
- Fair Oaks, located in northwest Fort Worth, was converted from public housing through the RAD process in 2014. Fair Oaks has a significantly higher proportion of white residents (59%) than the average property (25%). Fair Oaks also has the highest proportion of residents with disabilities (56%) and 61% of the residents are age 62 or older.
- Hunter Plaza, located in downtown Fort Worth, has the highest proportion of Asian residents of any property (5%).
- The Pavilion at Samuels has the highest proportion of Hispanic residents (36%) and is located in Uptown in the Greater Downtown neighborhood profile area.

PROGRAM	FEMALE	MALE	BLACK	WHITE	ASIAN	NATIVE AMER.	HISPANIC	Non Hispanic	UNDER 62	62 AND OLDER	DISABLED
Avondale	68%	32%	2%	40%	1%	0%	12%	88%	94%	6%	0%
Cambridge	56%	42%	39%	20%	0%	0%	23%	74%	88%	12%	2%
Candletree	69%	31%	80%	9%	2%	0.3%	11%	89%	87%	10%	1%
Carlyle	68%	33%	68%	10%	0%	0.0%	12%	88%	78%	9%	3%
Fair Oaks	53%	46%	33%	58%	0%	0%	18%	82%	39%	61%	56%
Fair Park	60%	40%	60%	21%	1%	0.6%	33%	67%	31%	4%	4%
Hometowne	71%	29%	26%	23%	0%	0.0%	2%	98%	9%	90%	2%
Knights of Pythias	61%	39%	30%	48%	0%	0.0%	17%	78%	100%	0%	0%
Hunter Plaza	55%	45%	43%	33%	5%	0.0%	14%	86%	82%	15%	13%
Pavilion	60%	40%	54%	37%	0%	0.0%	36%	64%	87%	11%	6%
Penn Place	61%	39%	62%	26%	0%	0.0%	13%	87%	90%	10%	0%
Villas by the Park	62%	38%	49%	5%	1%	0.0%	11%	89%	94%	4%	0%
Villas on the Hill	66%	34%	89%	7%	2%	0.6%	9%	91%	89%	9%	10%
Wind River	64%	36%	72%	20%	0%	0%	6%	93%	91%	9%	3%

Figure 205: Demographics for FWHS QuadCo-managed affordable housing properties (FWHS 2018)

¹⁸ Data is incomplete for some properties. Residents choosing not to disclose race or ethnicity and residents identifying as “other race or ethnicity” are not shown.

iv. B

Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

No additional information available.

v.

Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Fort Worth's Publicly Supported Housing Demographics by Race and Ethnicity

Looking at 2013 data, a stark contrast arises between Fort Worth's overall demographics and the population living in publicly supported housing. Whereas 42% of Fort Worth's population was white in 2013 (Figure 206), white households account for less than 7% of Public Housing residents (Figure 207). Percentages for Project-Based Section 8 and Housing Choice Voucher households appear slightly higher. White households comprise roughly 32% of those in Project-Based Section 8 housing and about 14% of those utilizing Housing Choice Vouchers. These figures align with the disproportionate percentage of low-income households in the FWHS jurisdiction that are non-white.

Black residents make up roughly 18% of the population but nearly 81% of Public Housing and 77% of HCV households. The 46% figure for Project-Based Section 8 housing remains the highest for any race. Hispanic residents account for almost 24% of Fort Worth's population in 2013. The share of Hispanic households differs significantly by type of publicly supported housing, with Hispanic households comprising 11% of Public Housing households and 8% of HCV households. Hispanic households represent a much larger share (19%) of those in Project-Based Section 8 housing; however, the program still serves a lower proportion than the Hispanic share of the general population. Asian/PI households make up around 3.7% of the overall population and less than 1% of residents living in public housing.

Race/Ethnicity	#	%
White, Non-Hispanic	312,551	42.14%
Black, Non-Hispanic	135,743	18.30%
Hispanic	251,371	33.89%
Asian or Pacific Islander, Non-Hispanic	27,339	3.69%
Native American, Non-Hispanic	2,502	0.34%
Two or More Races, Non-Hispanic	11,258	1.52%
Other, Non-Hispanic	995	0.13%

Figure 206: Race/Ethnicity of Fort Worth, (HUD Table 2, ACS 2013)

(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	57	6.24%	744	81.40%	106	11.60%	7	0.77%
Project-Based Section 8	654	32.01%	948	46.40%	399	19.53%	40	1.96%
Other Multifamily	238	60.56%	110	27.99%	39	9.92%	5	1.27%
HCV Program	914	13.66%	5,198	77.69%	545	8.15%	27	0.40%

Figure 207: Publicly Supported Households by Race/Ethnicity of Fort Worth, (HUD Table 6 IMS/PIC, TRACS, 2016; LIHTC 2014)

Figure 208 shows the extent of white/non-white segregation in different portions of Fort Worth in 2010 and 2015. Figure 209 shows the racial and ethnic composition of Fort Worth over time while Figure 210 indicates the location of Fort Worth's publicly supported housing. A disproportionate share of the city's non-white population lives inside I-820, which coincides with the location of publicly supported housing. Most LIHTC and other publicly supported housing is located in areas with greater concentrations of HCV holders. Locations of publicly supported housing most closely resembles concentrations of black and Hispanic residents in Fort Worth.

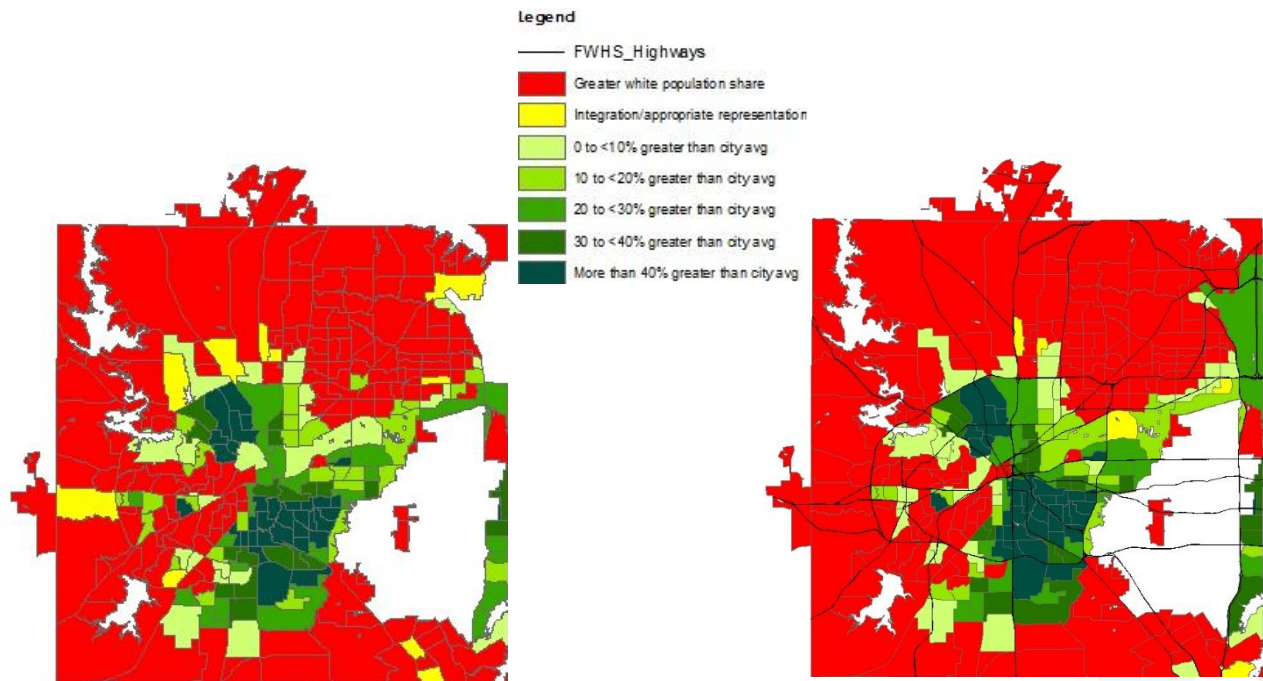


Figure 208: White/non-white segregation of FWHS jurisdiction in 2010 and 2015 (U.S. Decennial Census, ACS)

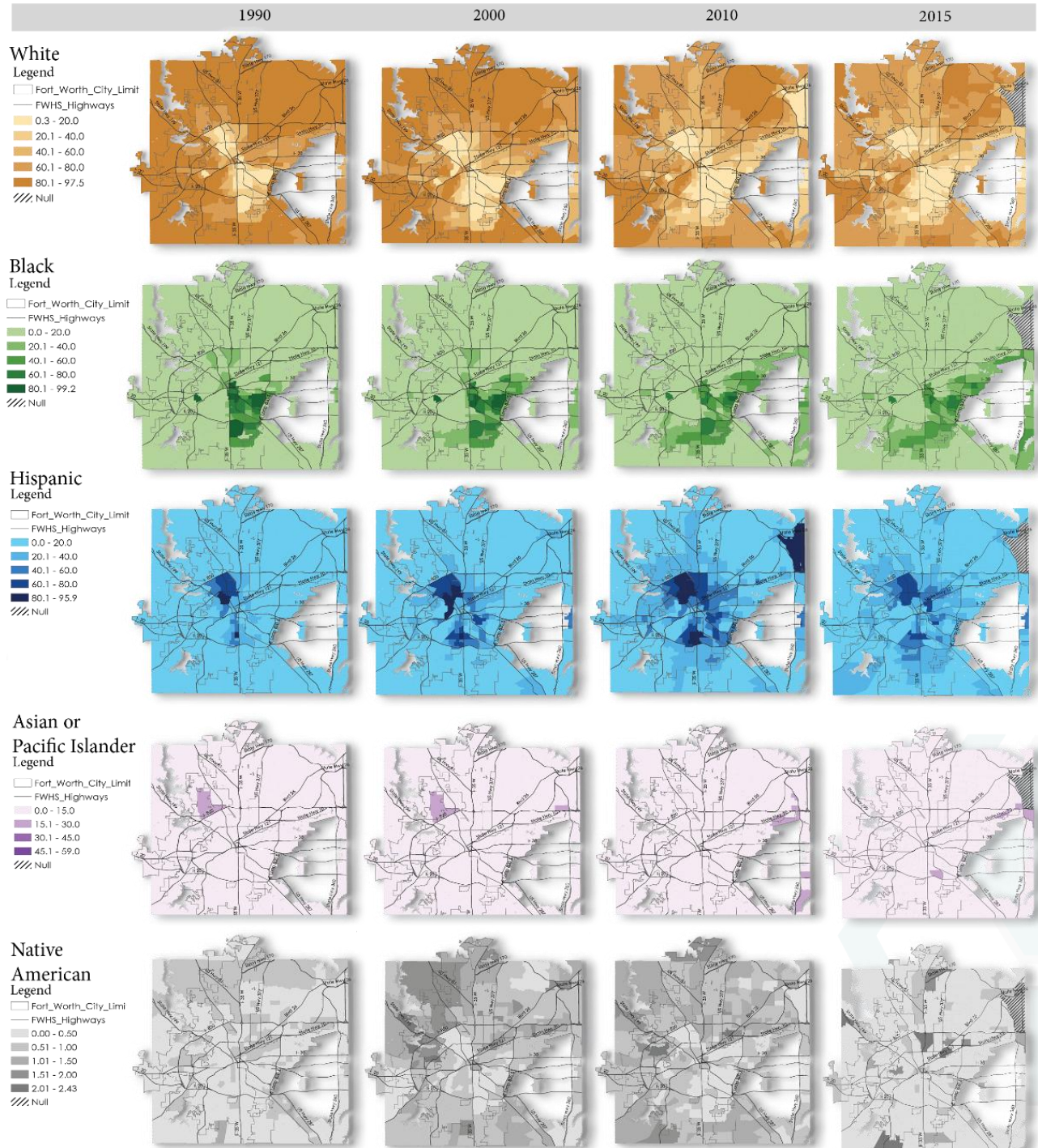


Figure 209: Percent of population by census tract for race and ethnicity, FWHS jurisdiction (U.S. Decennial Census 1990, 2000, 2010, ACS 2015)

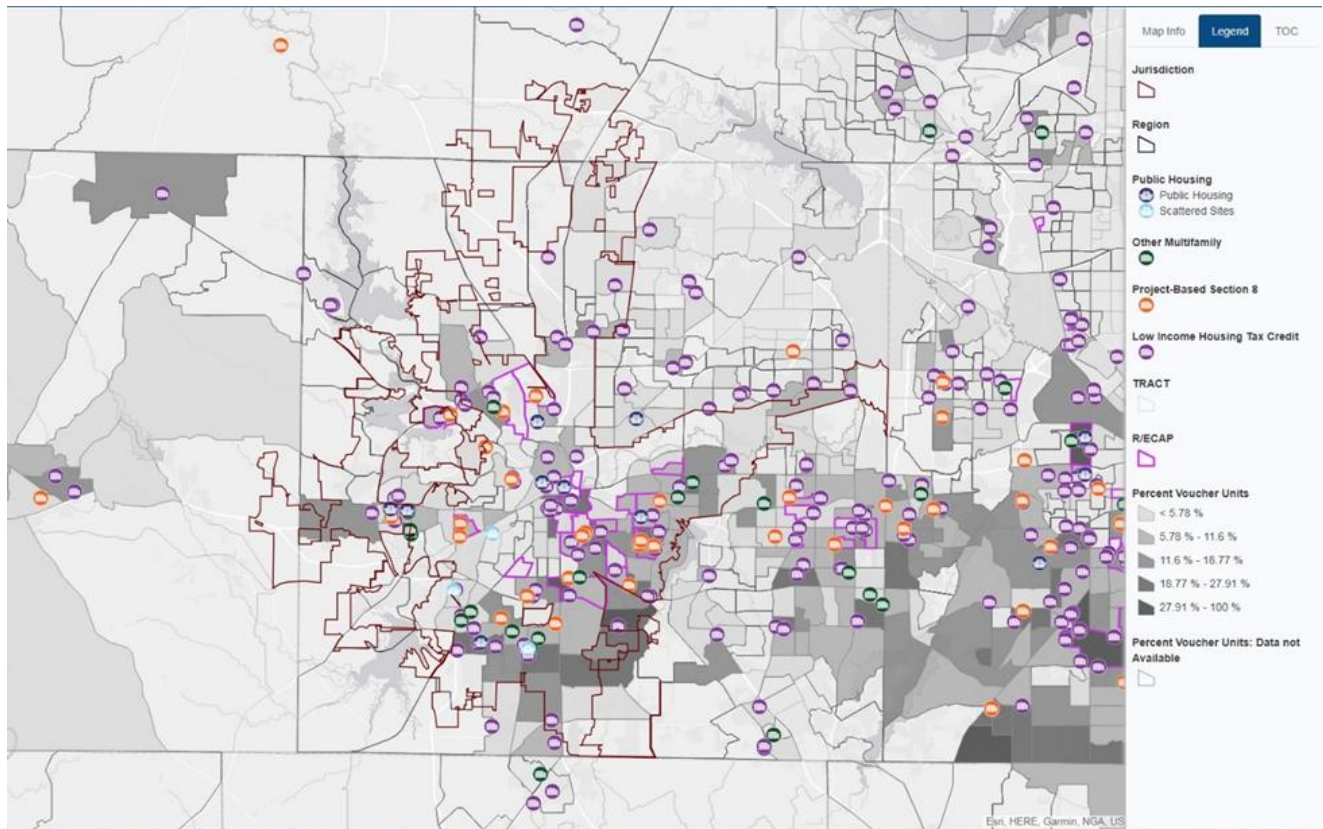


Figure 210: Publicly Supported Housing locations, Fort Worth, (HUD Map 5 IMS/PIC, TRACS, 2016; LIHTC 2014)

Families with Children in Fort Worth and Publicly Supported Housing

Figure 211 and Figure 212 compare numbers for families with children throughout Fort Worth and within its publicly supported housing. Families with children account for a smaller percentage of households than in the overall population in each type of publicly supported housing except Public Housing. All of the housing units in the Other Multifamily category have one bedroom or fewer, which makes them ill-suited to families with children. In addition, units with at least three bedrooms comprise less than a third of each publicly supported housing type in Fort Worth, which may indicate inadequate publicly supported housing stock for large families.

(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction		
Current		
	#	%
Family Type		
Families with children	95,402	53.77%

Figure 211: Fort Worth families with children, (HUD Table 1, ACS 2013)

(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction								
Housing Type	Households in 0-1		Households in 2		Households in 3+		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	232	24.81%	412	44.06%	284	30.37%	611	65.35%
Project-Based Section 8	904	43.44%	666	32.00%	488	23.45%	927	44.55%
Other Multifamily	404	89.38%	0	0.00%	0	0.00%	0	0.00%
HCV Program	1,818	26.45%	2,692	39.17%	2,216	32.24%	3,425	49.83%

Figure 212: Fort Worth's publicly supported housing by bedrooms and households with children (HUD Table 11 IMS/PIC, TRACS, 2016; LIHTC 2014)

Persons with Disabilities in Fort Worth and its Publicly Supported Housing

Approximately 10.5% of the civilian population of Fort Worth has a disability (U.S. Census 2016 ACS). Figure 213 demonstrates that persons with disabilities make up a greater proportion of persons in publicly supported housing than their representation in the general population. This is true for all the publicly supported housing programs, but especially the Housing Choice Voucher program, where about 25% of residents are persons with disabilities. Problems persist for persons with disabilities seeking affordable, accessible housing. The small percentage of housing units with full wheelchair accessibility fails to meet the needs of persons with physical disabilities, especially in lower income housing (Garnett, 2017). In addition, respondents during public participation mentioned that the types and sizes of housing for persons with disabilities remain extremely limited and that current supportive services are not sufficient.

(Fort Worth, TX CDBG, HOME, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	174	18.61%
Project-Based Section 8	352	16.91%
Other Multifamily	74	16.37%
HCV Program	1,724	25.08%

Figure 213: Persons with disabilities in the various publicly supported housing types (HUD Table 15 IMS/PIC, TRACS 2016; LIHTC 2014)

Disparities in Access to Opportunity

Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV and LIHTC) and between types (housing primarily serving families with children, elderly persons and persons with disabilities) of publicly supported housing.

Areas of opportunity contain the ingredients to provide a high quality of life. Areas of high opportunity score well in access to jobs, the amount of poverty nearby and the quality of nearby schools, which provides the greatest likelihood of facilitating higher educational and economic achievement.

Location of Publicly Supporting Housing

Figure 214 shows the geographic location of publicly supported households in Fort Worth, including voucher-subsidized households, public housing, LIHTC and other multifamily developments. The largest concentrations of voucher holders tend to occur in southeast Fort Worth. Project-Based Section 8 housing appears most frequently in the segregated areas of northwest and southeast Fort Worth inside I-820. The concentrations of HCV use and Project-Based Section 8 housing correspond to areas with lower index scores for the important opportunity indices.

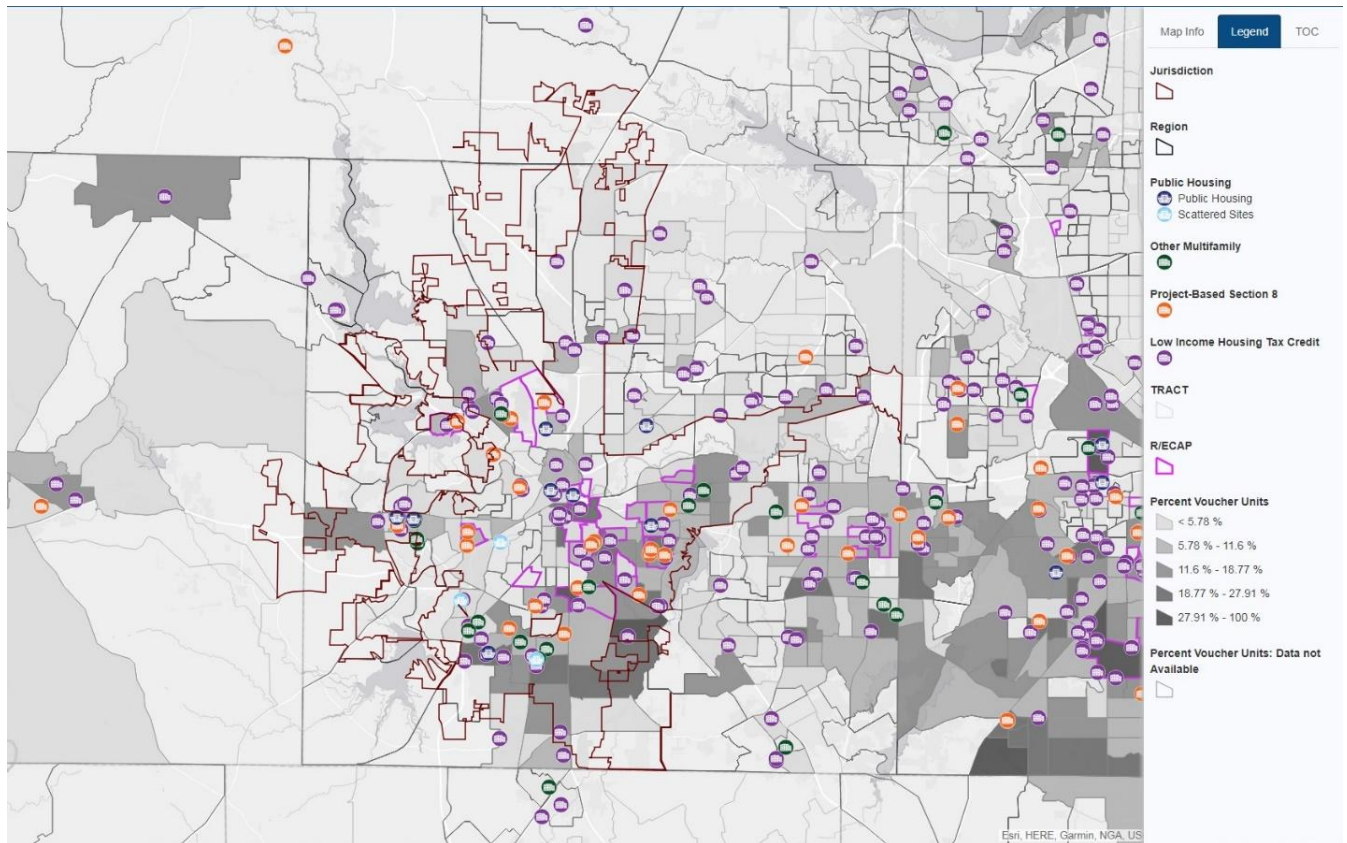


Figure 214: Publicly Supported Housing locations, Fort Worth, (HUD Map 5 IMS/PIC, TRACS, 2016; LIHTC 2014)

Jobs

The Jobs Proximity Index Figure 215 uses high scores to indicate high access to jobs. Scores show low proximity to jobs in many southeast census tracts with the highest rates of voucher holders. Many other pockets of low scoring census tracts exist throughout Tarrant County. Overall, the freeway network appears to strengthen the Jobs Proximity Index scores.

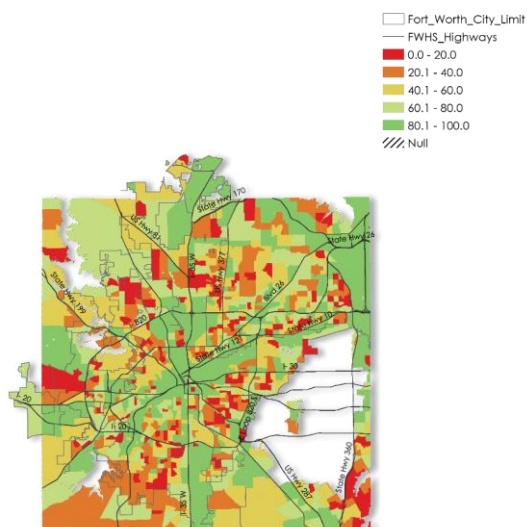


Figure 215: Jobs Proximity Index, FWHS jurisdiction (HUD, LEHD 2013)

Health

The Environmental Health index (Figure 216) measures air quality based on federal air quality standards. A comprehensive data set for Fort Worth does not exist. Rural areas in west Tarrant county appear to have the best air quality. Areas north of downtown Fort Worth and DFW Airport have poorer air quality than other urban and suburban locations in the FWHS jurisdiction.

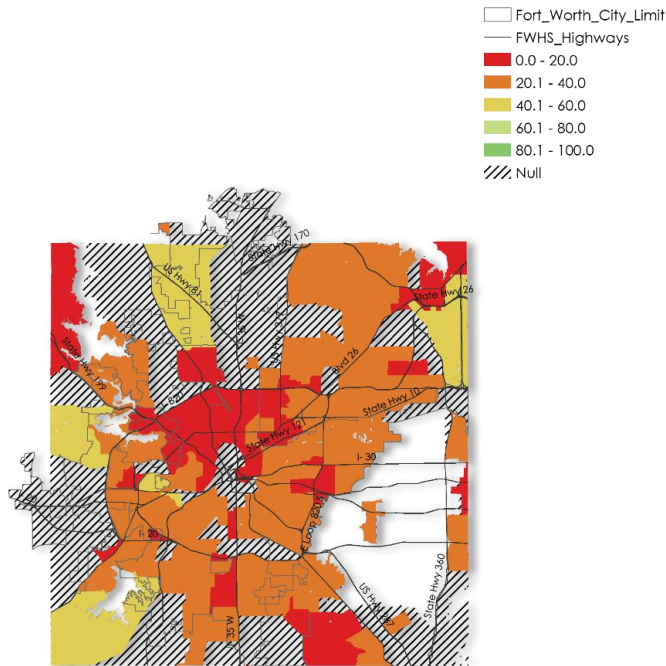


Figure 216: Environmental Health Index (HUD, NATA 2011)

Poverty

The Low Poverty Index (Figure 217) measures the proportion of households with incomes below the federal poverty rate in a census tract, where higher scores indicate less poverty. Most of the census tracts inside I-820 have low scores. North Tarrant County has consistently strong scores.

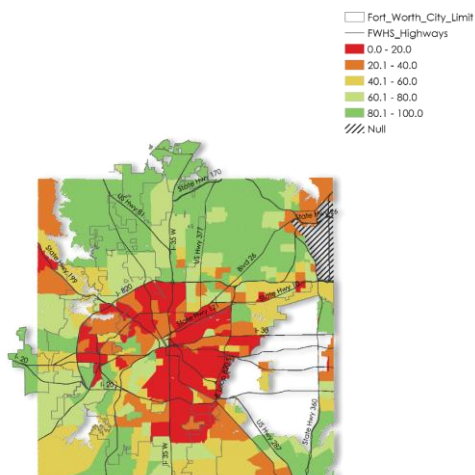


Figure 217: FWHS jurisdiction Low Poverty index (ACS 2013)

School

The School Proficiency Index (Figure 218) uses data on the performance of fourth-grade students on state reading and math exams to determine areas with high-performing elementary schools nearby (within three miles of the center of the block group). School proficiency scores appear low for most of Fort Worth other than west and southwest. North Tarrant County consistently has higher scores for the SP index.

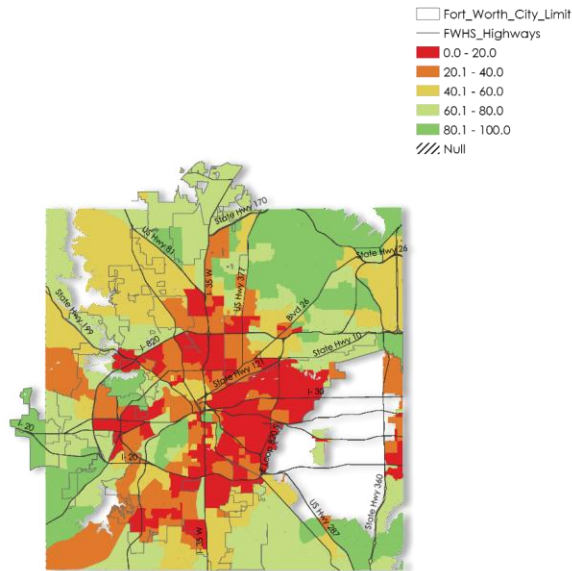


Figure 218: School Proficiency Index (Common Core/Great Schools 2013-14, Maponics 2016)

Labor

The Labor Market Engagement Index (Figure 219) provides a summary outlook based on the combination of census tract rates of higher education, unemployment and labor force participation. The northwest and southeast census tracts inside I-820 have lower LME scores. Northeast Tarrant County and southwest Fort Worth have higher scores.

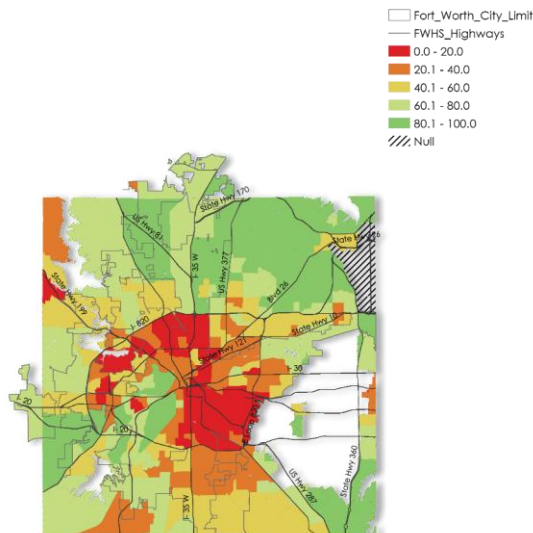


Figure 219: Labor Market Engagement Index (LEHD 2014)

Transportation

The study evaluates transportation in the FWHS jurisdiction using transit trips and transportation cost. The Transit Trips Index (Figure 220) uses estimates of the number of transit trips taken by a three-person single-parent household whose income equals 50% of the median income for renters in the DFW region. The higher the index value, the higher the likelihood that residents will use public transit. Overall, Fort Worth residents have a low to medium propensity to use public transit. Most places in Fort Worth have moderate scores. Suburban locations have low scores.

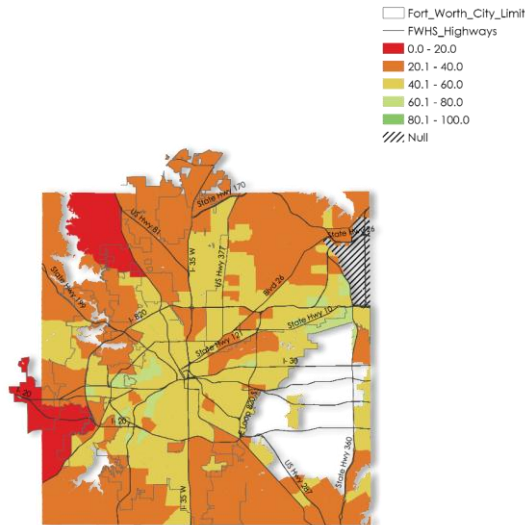


Figure 220: Transit Trips Index (HUD, LAI 2012)

The Low Transportation Cost index (Figure 221) uses the same three-person, single-parent family with income equal to 50% of the median income for renters in the DFW region to estimate transportation costs for a family. Areas in west Fort Worth and the mid-cities have better LTC scores. Suburban locations in north, west and south Tarrant County perform poorly based on the index.

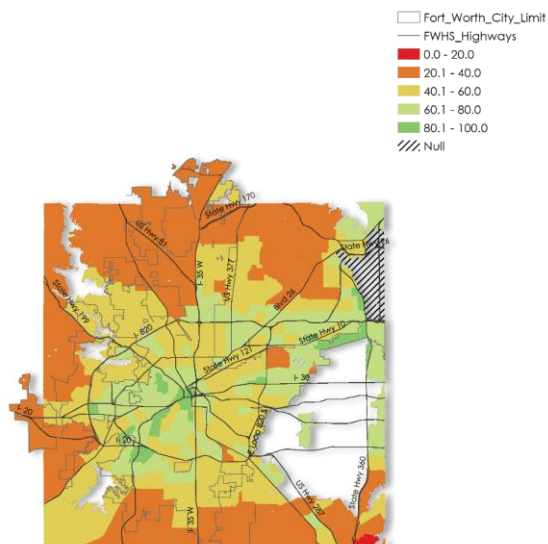


Figure 221: Low Transportation Cost index scores by census tract,

Transportation Affordability for Housing Choice Voucher Families

A study conducted by Igoufe, Mattingly and Audirac (2018) at the University of Texas at Arlington examined the extent to which HUD-assisted families (HCV) face cumulative barriers to affordable transportation options. The assessment looked at both private and public transportation options¹⁹.

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

The following graphs respectively show the HCV median income by household size and transportation affordability results.



Figure 222: HCV families' median income by household size

After meeting non-transportation needs (food, child care, and so forth), study results show that about 75% of HCV families are unable to afford buying, maintaining, and operating a car; and close to six out of 10 families cannot afford a regional monthly transit pass (\$160 or reduced fare \$40). Given the need to travel to access food, school, or employment, the results shed light on a potential recourse left to these families to meet their transportation needs: having to forego a nutritious diet, medical care, or other necessities.

¹⁹ Sample of 28,195 HCV families served by participating housing authorities in the NTRHA

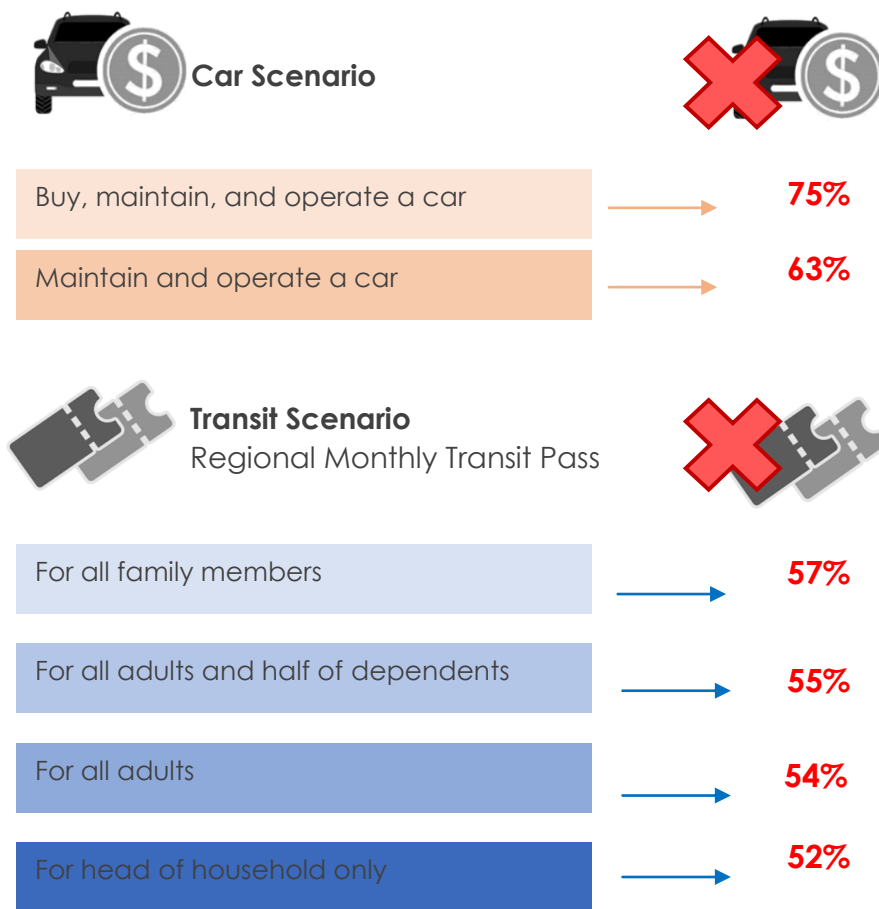


Figure 223: Proportion of HCV families unable to afford transportation (Igoufe et al. 2018)

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

2. Additional Information

a.

Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD provided data.

Waiting lists

In November 2017, FWHS opened its waiting list for applicants to the HCV program for the first time since 2011 (Figure 224). Over 18,000 persons were on the waiting list for HCVs at one point in 2014 (Hirst, 2014). FWHS received 5,189 applications in the first 16 hours after opening the list (Mitchell, 2017).

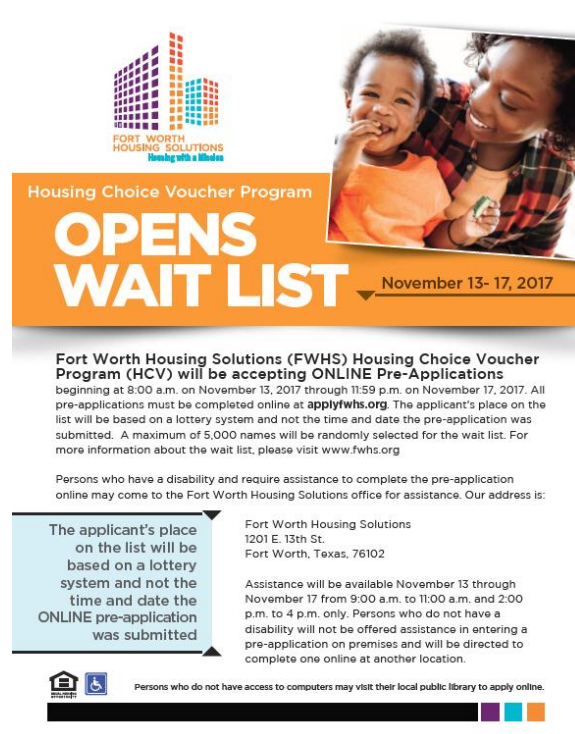


Figure 224: Flyer distributed to announce FWHS wait list opening 2017

Applicants to the FWHS HCV program (Figure 225) are disproportionately extremely low-income (72%) and black (77%), exceeding Tarrant County proportions of all households for these groups (U.S. Census Bureau, 2016; Fort Worth Housing Solutions, 2015a).

Housing Needs of Families on the Waiting List		
Section 8 Tenant-Based Rental Assistance		
	# of Families	% of total families
Wait List Total	17,037	100%
Extremely low income $\leq 30\%$ AMI	12,463	72%
Very low income $>30\%$ but $\leq 50\%$ AMI	3,807	22%
Low income $>50\%$ but $<80\%$ AMI	1,038	6%
Elderly Applicants	1,125	6.5%
Disabled Applicants	1,211	7%
White	3,634	21%
Black	13,326	77%
American Indian	146	1%
Asian Pacific	122	1%
Hispanic	1,557	9%

Figure 225: FWHS HCV waiting list 2015 demographics

Households on the FWHS waiting list for public housing (Figure 226) are disproportionately extremely low-income, black and have a member with disabilities when compared with county-wide rates for these classes (U.S. Census Bureau, 2016; Fort Worth Housing Solutions, 2015a).

Housing Needs of Families on the Waiting List(s)		
Public Housing		
	# of Families	% of total families
Wait List Total	3,643	100%
Extremely low income $\leq 30\%$ AMI	3,212	89%
Very low income $>30\%$ but $\leq 50\%$ AMI	3821	11%
Low income $>50\%$ but $<80\%$ AMI	49	2%
Elderly Families	27	1%
Families with Disabilities	410	12%
White	763	21%
Black	2,693	74%
American Indian	11	0%
Asian Pacific	16	0%
Hispanic	432	12%
Characteristics by Bedroom Size (Public Housing Only)		
1 BR	997	28%
2 BR	1,888	52%
3 BR	730	20%
4 BR	66	14%
5 BR	0	0%

Figure 226: FWHS Public Housing Waiting List 2015 demographics

Preferences

FWHS recognizes disproportionate housing needs through the preferences it exercises in its HCV program. FWHS may serve households with the following characteristics before non-preferred households due to their disproportionate housing needs:

- Displaced families (by natural disaster, government action, domestic violence, disposition of public housing)
- Homeless college students (10 vouchers)
- Special accommodation for persons with disabilities living in public housing

- Persons transitioning from nursing homes through the state “Money Follows the Person” program for supportive services (10 vouchers)
- Families at risk of losing children through the state Family Unification Program (100 vouchers if grant-funded)
- Homeless persons referred through Texas Workforce Solutions Project WISH special employment program (10 vouchers)
- Persons moving to HCV from a local permanent supported housing program (150 vouchers) who no longer need intensive case management
- Homeless persons with mental illness (40 vouchers, MHMR)
- Homeless families with children referred by FWISD (20 vouchers)

LIHTC programs:

The availability of Low Income Housing Tax Credit units is less than the need for housing for low-income residents in Fort Worth and in the region. Figure 227 compares the availability of LIHTC units with the number of low-income households across major cities participating in the North Texas Regional Housing Assessment. Over 13k units, or 4.4%, of total 2017 housing units located in the City of Fort Worth are LIHTC units (Texas Department of Housing and Community Affairs, 2017; North Central Texas Council of Governments, 2018). This rate is higher than all other large cities in the NTRHA consortium. Twenty-two percent of Fort Worth households (62,591) had incomes below \$25,000 per year in 2016 (U.S. Census Bureau, 2016). These households have annual incomes below 50% of area median income and would qualify for LIHTC and other publicly supported housing, but may not have sufficient income to afford LIHTC rents.

NTRHA Cities	# of LIHTC Units TDHCA 2017	# of Housing Units NCTCOG 2017	LIHTC Units as % of Total Housing Units (2017)	% Total Households < \$25k annual income (2016 ACS)	Median Household Income (ACS 2016)	\$25k as % of Median Household Income (2016 ACS)
Ennis	508	6,695	7.6%	29%	\$ 43,774	57%
Cleburne	703	11,302	6.2%	25%	\$ 49,573	50%
Fort Worth	13,698	314,761	4.4%	22%	\$ 54,876	46%
Waxahachie	563	13,374	4.2%	19%	\$ 55,385	45%
Denton	2,156	52,044	4.1%	26%	\$ 50,487	50%
Grandview	24	604	4.0%	28%	\$ 44,193	57%
Greenville	428	10,971	3.9%	32%	\$ 37,304	67%
Dallas	20,116	542,928	3.7%	27%	\$ 42,215	55%
McKinney	2,262	61,220	3.7%	11%	\$ 83,257	30%
Ferris	16	864	1.9%	24%	\$ 50,150	50%
Garland	1,287	82,787	1.6%	19%	\$ 53,220	47%
Irving	1,322	96,160	1.4%	19%	\$ 54,868	47%
Plano	1,174	109,813	1.1%	11%	\$ 85,085	29%
Frisco	404	58,150	0.7%	6%	\$ 117,642	21%
Region/MSA	64,775	2,650,896	2.4%	18%	\$ 61,330	41%

Figure 227: LIHTC units in NTRHA cities as a percent of total housing units compared with low-income households (TDHCA 2017, NCTCOG 2017, ACS 2016)

LIHTC property rents primarily target households with incomes at 50%-60% of area median income such that housing expense does not exceed 30% of annual income (Texas Department of Housing and Community Affairs, 2018). The LIHTC supply fails to meet the need for housing for households at 30% area median income across the nation (Kitchens, 2017). Figure 228 displays the affordable rents offered by LIHTC projects in the Fort Worth-Arlington metropolitan area for different income levels (60% AMI, 50% AMI, 30% AMI) (Novogradac & Company LLP, 2018). Rents at properties providing housing for persons at 60% AMI would not be affordable to 30% AMI households without additional subsidies such as HCVs.







LIHTC Rent Limits for 2018 (Based on 2018 MT SP/LI Income Limits)						
Bedrooms (People)	Charts	60.00%	50.00%	30.00%	FMR	
Efficiency (1.0)		790	658	395	736	
1 Bedroom (1.5)		846	705	423	838	
2 Bedrooms (3.0)		1,015	846	507	1,054	
3 Bedrooms (4.5)		1,173	978	586	1,452	
4 Bedrooms (6.0)		1,309	1,091	654	1,851	
5 Bedrooms (7.5)		1,444	1,203	722		

Figure 228: LIHTC-authorized rents for Fort Worth-Arlington, 2018

Figure 229 displays the location of Tarrant County's LIHTC properties as of July 2017 (Novogradac & Company LLP, 2017). Most tax credit properties are concentrated in southeast Fort Worth, far west Fort Worth (Las Vegas Trail area) and in northwest Fort Worth along I-820. A listing of all LIHTC properties in the FWHS jurisdiction is included in the Appendix. TDHCA lists one hundred twelve projects with 18,195 units in Tarrant County (excluding Arlington) approved from 1990 to 2017. Twenty-three percent of these properties target elderly residents. One property, the Vineyard on Lancaster, a project of the Union Gospel Mission and located next to its transitional housing program, is designated for 98 units of supportive housing. Only 44 of the projects (39%) include some market rate housing while the remainder are completely designated for persons at 50%-60% area median income.

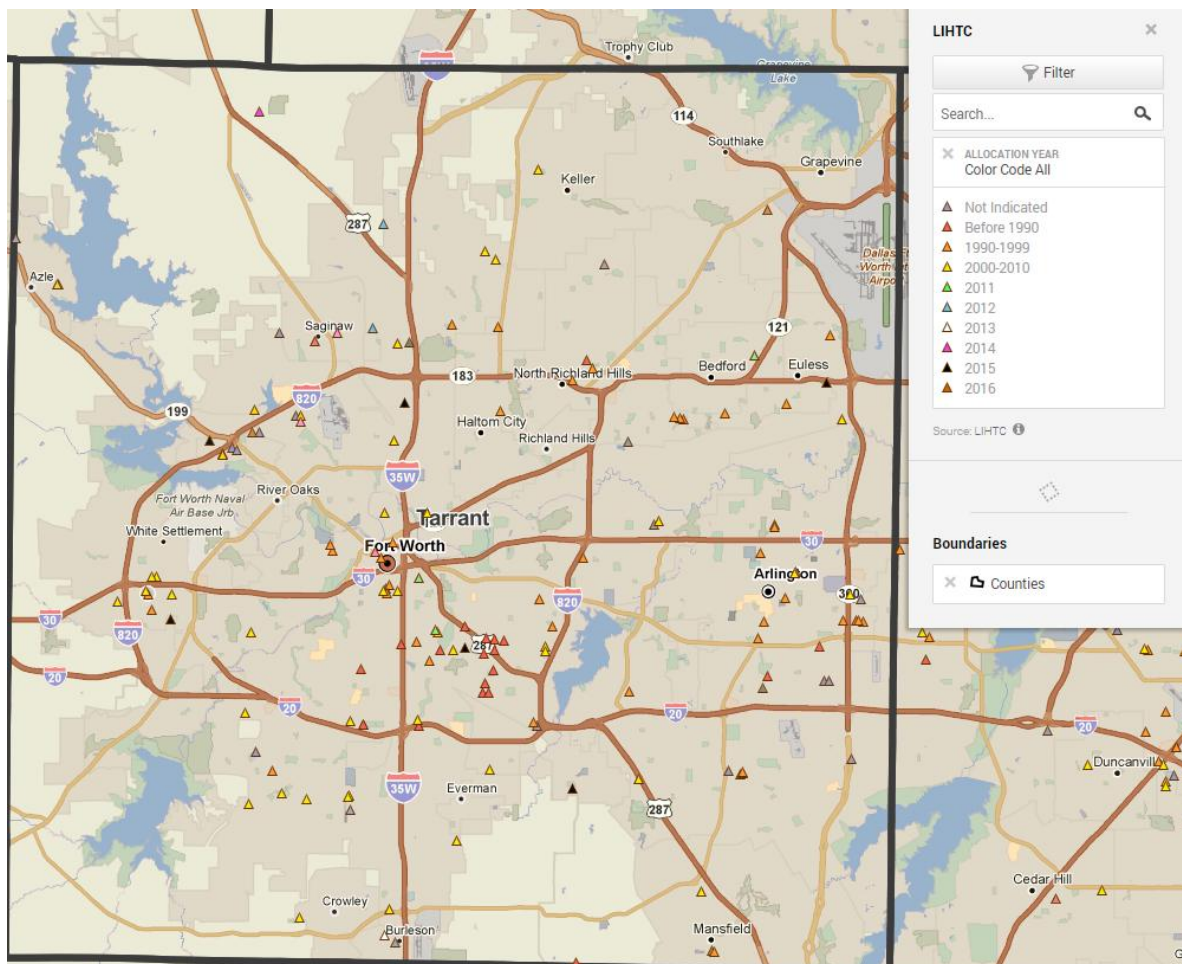


Figure 229: LIHTC properties in Tarrant County as of July 2017 by allocation year (Novogradac 2017)

Figure 230 shows the number of LIHTC units that will reach their first 15-year compliance date, the earliest opportunity when the units may be converted to market rate housing. An average of 243 units reach the compliance date each year from 2019 through 2032. A HUD report finds that LIHTC projects rarely convert to market rate at the 15-year date except in extremely tight housing markets (Khadduri, Climaco, Burnett, Gould, & Elving, 2012). The first local LIHTC projects reach their 30-year compliance dates in 2020. Researchers expect to see more conversions at the 30-year point.

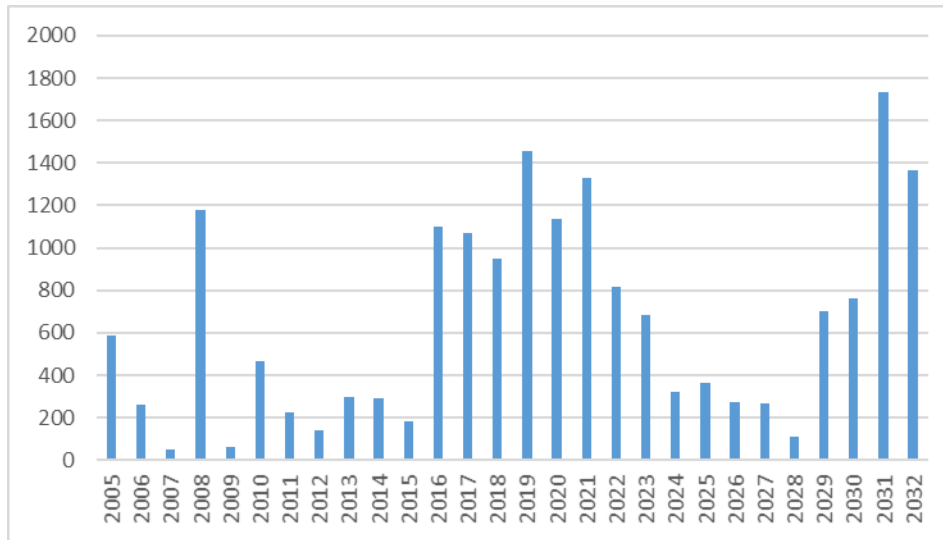


Figure 230: LIHTC units at 15-year compliance dates, Tarrant County, excluding Arlington, TDHCA 2017

The amount of publicly supported housing is significantly less than the number of households that would qualify for assistance Figure 231. Approximately 5% of the housing units in Tarrant County are supported by some form of housing assistance, including public housing, vouchers and LIHTC units (Texas Department of Housing and Community Affairs, 2017; U.S. Department of Housing and Urban Development, 2017). Households with incomes less than \$25,000 per year (41% of area median income) would require an affordable rent (including utilities) of approximately \$600 per month or less at 30% of income. Average rents now exceed \$900 per month (MPF Research, 2017). Nineteen percent of households in Tarrant County had incomes below \$25,000 in 2016 (U.S. Census Bureau, 2016).

	Tarrant County
Total Housing Units	740,335
Low-income housing supply	
LIHTC Units	21,222
Public Housing Authority Units	17,452
Subtotal	38,674
Subtotal: As a % of total housing units	5%
Households w/income < \$25k	19%
\$25k as % of Area Median Income	41%

Figure 231: Comparison of available units of publicly supported housing with low-income households (TDHCA 2017, HUD 2017, ACS 2016)

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

Family Self Sufficiency

Participation in both the FWHS FSS and Homeownership programs have increased since 2015. Figure 232 displays the number of participants in each program and the number of households successfully closing on a home purchase in 2015, 2016 and 2017. FSS participation increased by 11% and Homeownership participation by 35% from 2015 to 2017.

Year	# of FSS Participants	# of FSS Graduates	# of Homeownership Participants	# of Property Closings
2015	285	17	288	9
2016	302	18	306	22
2017	316	19	390	7

Figure 232: Results of FWHS FSS and Homeownership programs (FWHS 2018)

FWHS supports one of the largest FSS programs in the U.S. in number of participants (Ficke & Piesse, 2004) ranking in the top 14% of public housing authorities with HCV programs. Approximately 5% of its HCV and public housing clients participate in FSS, placing it among the top half of all FSS programs for participation rate. Participants receive close case management and assistance with establishing, maintaining and achieving personal, educational and financial goals. Graduates achieve their goals, become fully employed and independent of cash welfare assistance (Broussard, 2018).

FWHS was recently recognized for agreeing to establish a HUD EnVision Center at the Martin Luther King Jr. Community Center in the Stop Six neighborhood, near the Cavile Place public housing development, in partnership with the City of Fort Worth (Baker, 2018). HUD's EnVision model calls for creating one-stop resource centers near public housing through partnerships with agencies to provide employment, education, health and character-building assistance (U.S. Department of Housing and Urban Development, 2018). No federal funding is attached to the program. The EnVision center will be located less than three miles from the Resource Connection, Tarrant County's one-stop assistance center with education, employment and health and wellness services for the community, low-income residents and persons with disabilities.

Place-based investments

FWHS is making a significant contribution to place-based investment through redevelopment of aging public housing and stabilizing and improving properties in areas in need of revitalization. The following projects (described in greater detail in earlier questions), include:

- Hunter Plaza (completed redevelopment)
- Butler Place (RAD approved, in process)
- Cavile Place (RAD approved, in planning)
- Columbia Renaissance (new affordable housing in revitalizing community)
- South Main (FW's first transit-oriented development in partnership with Trinity Metro)

FWHS has also assumed a leadership role in addressing problems facing the Las Vegas Trail corridor, a R/ECAP in west Fort Worth with 32 apartment properties. FWHS leads the housing

subcommittee bringing together property managers with Fort Worth code, police and legal departments to address problems, including property maintenance, crime and unsheltered homelessness.

Mobility

FWHS provides mobility counseling to its public housing residents through the RAD process. The significant number of new FWHS properties developed and under development since 2010 in higher opportunity communities (discussed in detail previously) is providing publicly supported housing participants with greater choices. Inclusive Communities Project also provides extensive mobility counseling to Walker Voucher holders who have the opportunity to relocate in communities throughout the metropolitan area, including Tarrant County.

Project-based vouchers

FWHS employs project-based vouchers (PBV) to meet the special needs of low-income families, homeless individuals and families, youth aging out of foster care and veterans (Fort Worth Housing Solutions, 2017). FWHS plans to award up to 20% of its vouchers under the Annual Contributions Contract (ACC) for tenant-based Housing Choice Voucher program for PBVs. FWHS's 10 PBV properties are spread throughout its jurisdiction as shown in Figure 233.

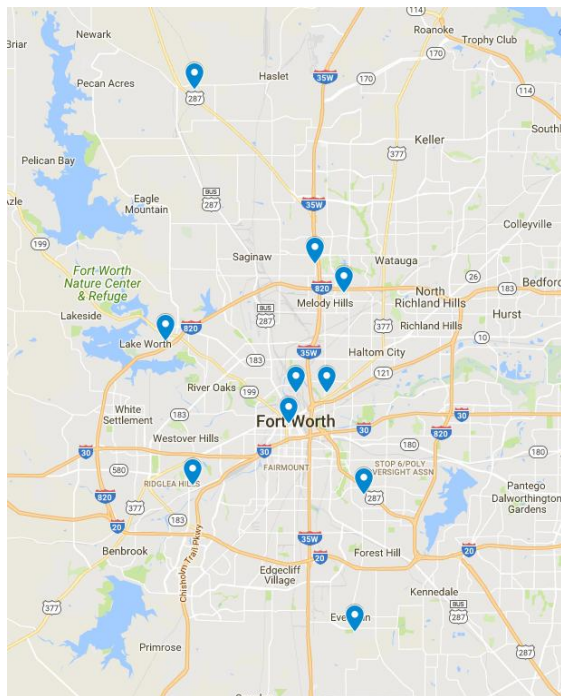


Figure 233: Locations of FWHS PBVs, FWHS 2017

FWHS PBVs are largely located in tax-credit properties giving extremely low-income residents (30% area median income) an opportunity to live in properties or communities that they normally could not afford without an additional subsidy. Rents start at approximately \$700 per month for persons with incomes below \$30k per year at rent-restricted tax credit properties (Miller Valentine Group, 2018). This rent amount would be affordable to a household making \$21k per year at 30% of income. Approximately 10% of households in Tarrant County (68k households) earn less than \$15,000 per year (U.S. Census Bureau, 2016). FFWHS PBVs are located in a variety of census tracts ranging from poverty rates of 6% to 45% with an average value of 21% as shown in Figure 234.

The property with the highest poverty rate, Columbia Renaissance, is a part of a master planned community, including new schools, recreation facilities, retail, health-care and employment opportunities in southeast Fort Worth designed to revitalize a long-neglected City sector (Fort Worth Business Press, 2018). The Palm Tree Apartments are located in a rapidly gentrifying community with hundreds of market rate apartments recently completed or under development starting at \$1,060 per month for studios (CoStar Group, Inc., 2018).

Project name	Zip Code	# of Units	Total Units	Housing/Property Type	Poverty Rate
Hunter Plaza	76102	30	164	Mixed-income/Tax credit/Central Business District	6%
Avondale Apartments	76052	40	160	Tax credit	6%
Sedona Village	76131	15	132	Age 55+/Income Restricted/ Tax credit	11%
Mercantile Apartments	76137	10	324	Tax credit/Rent Restricted	18%
Pavilion at Samuels	76102	8	36	Townhomes/Tax credit	21%
Villas on the Hill	76107	2	72	Apartments/Market	21%
Palm Tree Apartments	76111	24	24	Nonprofit/Permanent supported housing for formerly homeless	22%
Stallion Pointe	76140	25	250	Tax credit	26%
Reserve at Quebec	76135	11	189	Tax Credit/Income restricted	31%
Columbia Renaissance/ Renaissance Heights	76119	35	140	Mixed-income/Tax credit/Master planned community	45%

Figure 234: FWHS PBV properties by poverty rate of location (FWHS 2017, ACS 2016)

Addressing Homelessness

The Continuum of Care for Tarrant County includes a full complement of programs to address homelessness, including:

- Prevention
- Diversion
- Outreach
- Emergency Shelter
- Transitional Housing
- Rapid Re-Housing (RRH)
- Permanent Supportive Housing (PSH)
- Permanent Housing

The system includes 30 agencies and 98 programs and supplies 4,447 beds for persons emerging from homelessness throughout Tarrant and Parker counties (Tarrant County Homeless Coalition, 2018). Over 1,700 people participated in RRH programs in 2017, 76% of whom exited to permanent housing after an average of seven months. Thirty-four percent of RRH participants increased or retained employment during their time in the program (Tarrant County Homeless Coalition, 2018). Only 9% of persons in PSH returned to homelessness and 67% increased or retained income from welfare benefits programs to which they are entitled.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Approximately 20% of FWHS Housing Choice Vouchers expire due to failure to find an acceptable unit (Fort Worth Housing Solutions, 2018). The primary reason for returned vouchers is failure to find an affordable unit that meets the FWHS payment standards.

For a recent cohort of 1,248 applicants reviewed from the waiting list, only 8% (101 applicants) were placed in housing (Fort Worth Housing Solutions, 2018). Over 80% of applicants from the waiting list invited to begin screening did not respond. Figure 235 displays the number of applicants lost at each step in the application and review process for this recent applicant cohort, beginning with the 228 applicants who responded. Failure to meet screening requirements was the most common reason for failure to complete the process, including 18% attrition for criminal background screening.

Review steps:	Applicants in consideration:	Attrition at each step:	Attrition as % of total
Screened for criminal record	228	42 failed criminal background check	18%
Other screening (failure to return documents, over-income, debts owed to housing authorities)	186	40 fail other screening	18%
Invited to briefing to receive voucher	146	15 did not attend briefing	7%
Issued voucher and began search	131	30 did not find unit	13%
Sign HAP contract and move in	101		44% success

Figure 235: Reasons for failure to move into housing for HCV applicants, FWHS 2018

A recent HUD study of voucher acceptance in Fort Worth found that only one of every 30 advertisements for apartments to rent was potentially eligible for rent by a voucher holder including meeting fair market rent limits (Cunningham et al., 2018). Seventy-eight percent of landlords offering voucher-eligible properties would not accept voucher-holders as tenants. Another 7.2% of these landlords would only accept a voucher under certain conditions, including which housing authority offered the voucher, only for certain unit sizes, a voucher covering a certain portion of the rent or tenant characteristics such as credit score. The study found that finding a housing unit that would accept a voucher was a very difficult, frustrating and time-consuming process.

LIHTC programs play an important role by providing a place where HCV-holders can use their vouchers, even when their income is too low to afford LIHTC rents. LIHTC properties are required by the terms of their tax credit agreements to accept HCVs (Lemons, 2018). Nearly 19% of HCV-holders (1,055) in the FWHS jurisdiction live in 30 properties, based on data provided by NTRHA members. Most of these vouchers (87%) are used at 22 LIHTC properties ranging from nine to 112 vouchers per property.

Insufficient funding exists to meet the needs for low-income housing in the face of rapidly rising housing costs. FWHS was authorized a budget of \$35,384,738 for 2017 to support its authorization of 5,104 HCVs or \$578 per month per unit (Fort Worth Housing Solutions, 2018). FWHS spent an average of \$597 per month per unit in 2017 in order to make up the difference between 30% of tenant income and rent, using 99% of its authorized vouchers while spending 103% of its

authorized budget. (FWHS established its payment standards at 110% of Fair Market Rents for 2017, prior to the conversion to SAFMR.) The transition to SAFMRs will increase costs and reduce further the number of vouchers that can be used without an increase in budget authorization by the U.S. Congress.

The majority of comments received during public meetings and focus groups concerning contributing factors to lack of access to publicly supported housing received were associated with **community opposition** to affordable and subsidized housing. Over 250 comments from the CFW survey concerned community opposition. **Site selection** processes that rely heavily on neighborhood and elected official support were also identified as presenting barriers to affordable housing. **Source of income discrimination** was described as community opposition operating at the individual level.

Respondents stated opinions that publicly subsidized or affordable housing is associated with:

- Increased crime
- Poor property management and maintenance and deteriorating properties
- Strained community infrastructure (schools, roads, etc.)
- Reduction in property values
- Lack of transparency in site selection processes

Individuals who use publicly subsidized housing were seen as negative influences and lacking investment in the community. Some community opposition stems from beliefs about fairness, e.g. that people should not be given things that other people must work for. Participants said that the result of community opposition is a lack of access to publicly supported housing in high-opportunity areas.

The **quality of affordable housing information programs** received 37 comments as contributing to problems in accessing publicly supported housing. These comments related to information about all types of affordable housing programs, including how to access property tax reductions based on age, learn about publicly subsidized housing options and access programs for low-income homeowners.

Twenty-eight comments were concerned with a lack of public and private **investment in specific neighborhoods** where publicly supported housing is located. Participants said that areas with a high concentration of publicly subsidized housing also had reduced investments.

D. Disability and Access

1. Population Profile

a.

How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

The following series of maps displays rates of disabilities among the residents of Fort Worth and the region. Maps from previous sections describing segregation and R/ECAPs are repeated here for reference, including Fort Worth white/non-white segregation (Figure 236), Fort Worth R/ECAPs (Figure 237) regional white/non-white segregation (Figure 238) and regional R/ECAPs (Figure 239).

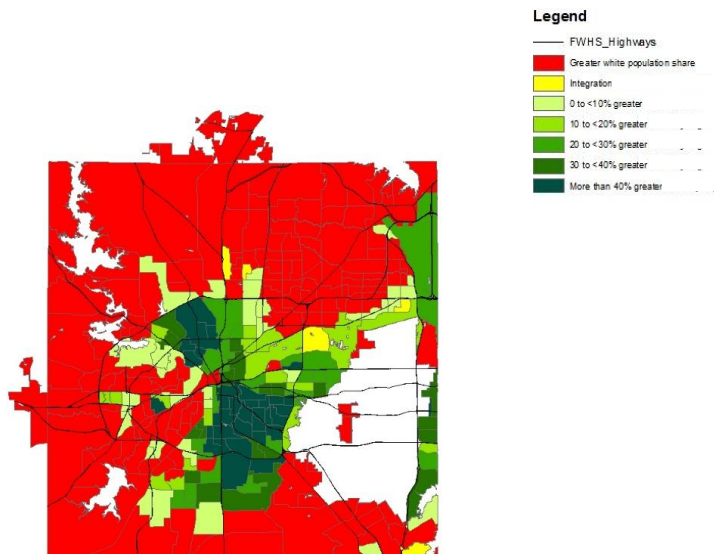


Figure 236: Fort Worth white to non-white segregation (ACS 2015)

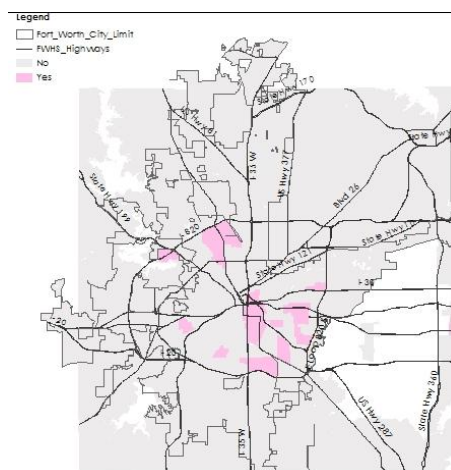


Figure 237: R/ECAPs map of FWHS for the region in (ACS 2015)

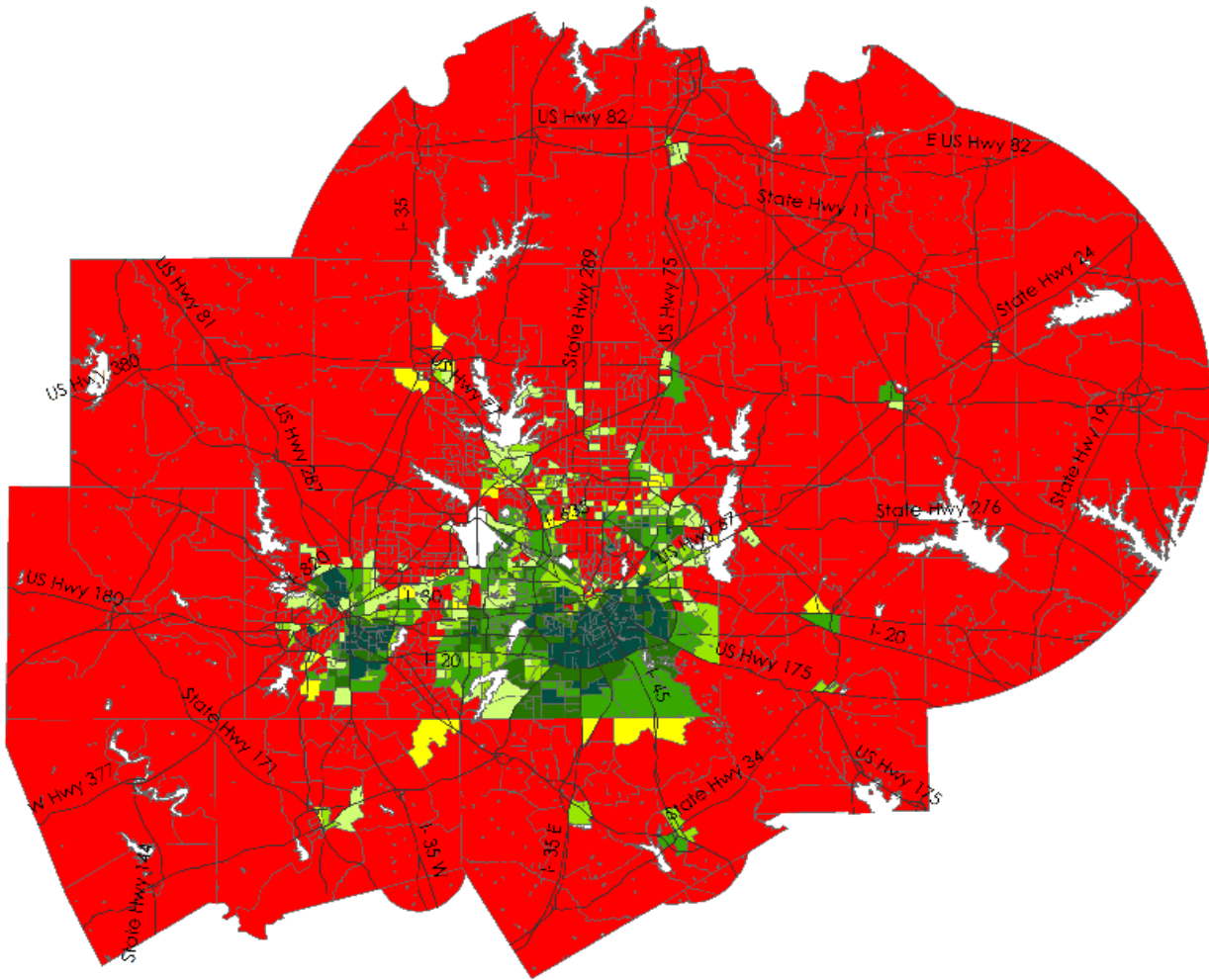


Figure 238: Regional white/non-white segregation (ACS 2015)

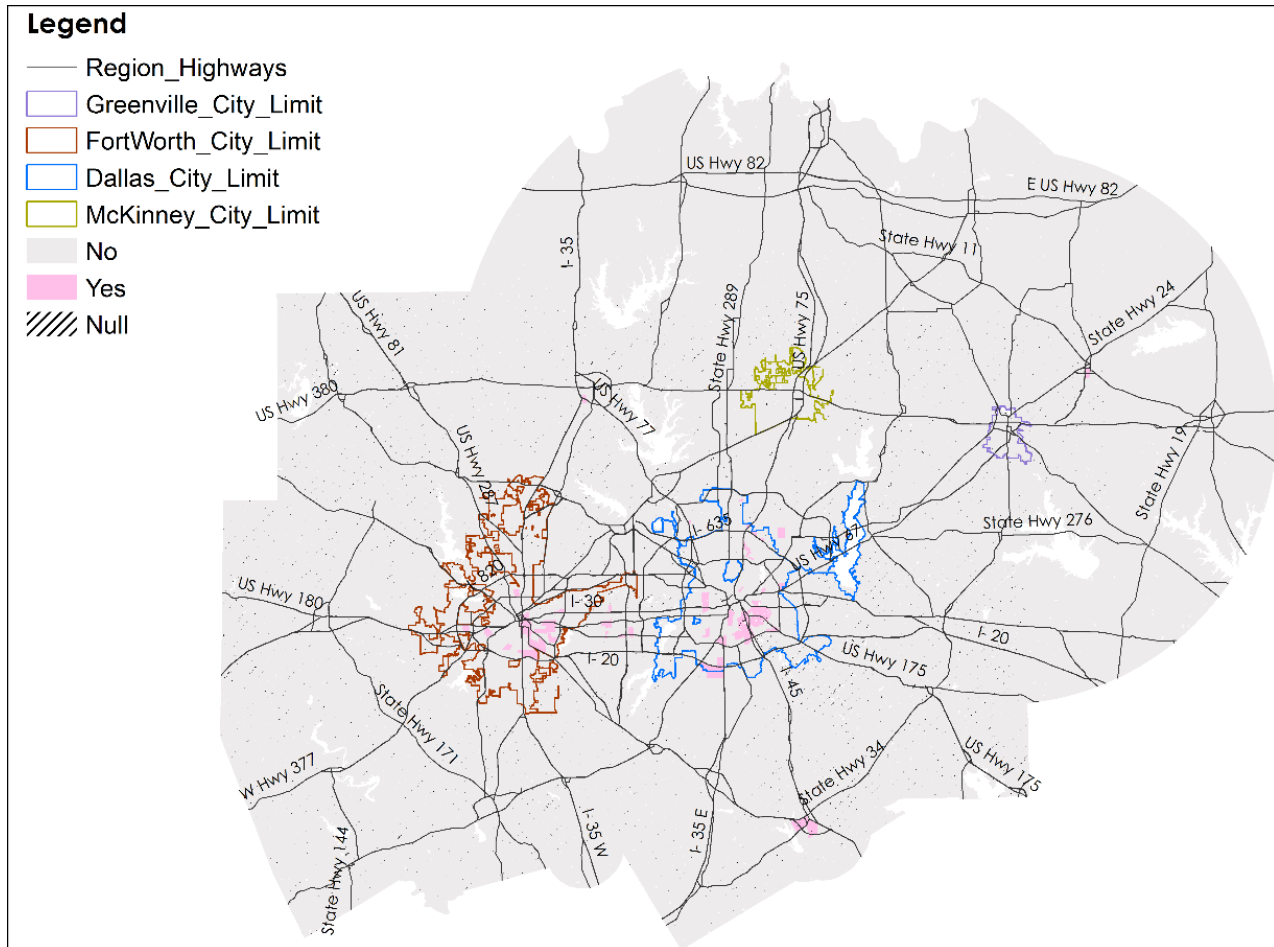


Figure 239: Regional R/ECAPs (ACS 2015)

No census tract has more than 5% of residents, age 5-17 with disabilities as of 2013 (Figure 240). The highest rates of working-age adults with disabilities (age 18-64) occur near downtown and in east Fort Worth and coincide with lower income communities with higher proportions of minority residents (Figure 241). Older adults (age 64 and over) appear less concentrated (Figure 242) other than in one census tract along I-30 in east Fort Worth.

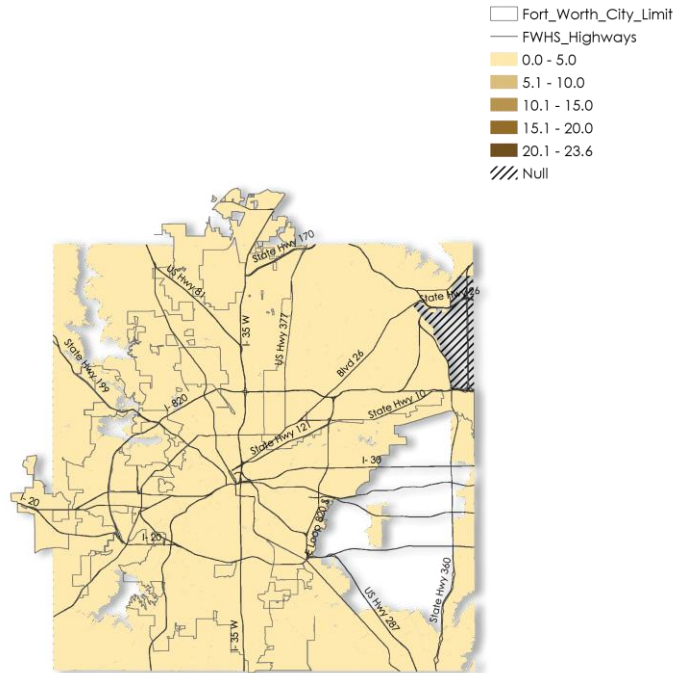


Figure 240: Percentage of population age 5-17 with disabilities, region (ACS 2013)

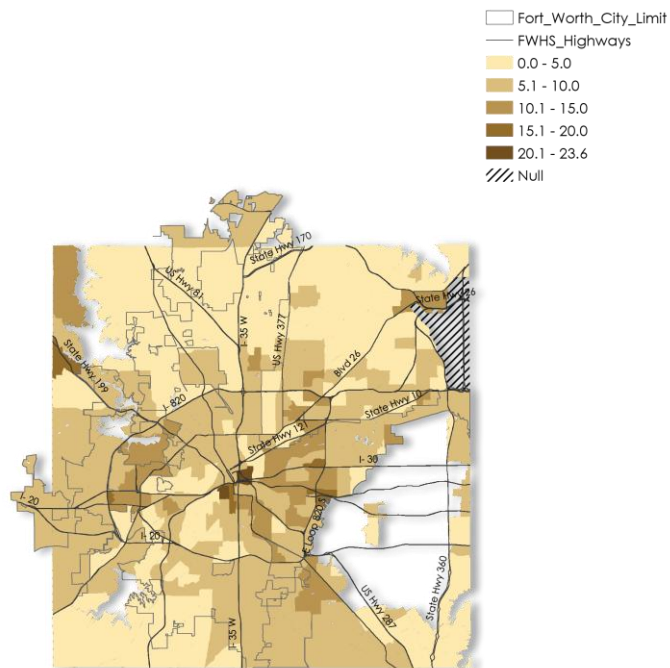


Figure 241: Percentage of population age 18-64 with disabilities, FWHS (ACS 2013)

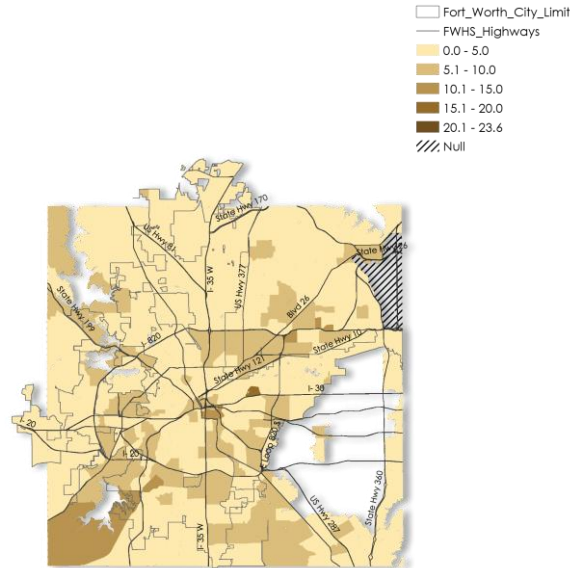


Figure 242: Percentage of population over age 64 with disabilities, Fort-Worth 2013

No census tract in the region has over 10% of residents, age 5-17, with disabilities (Figure 243). Working-age residents with disabilities (age 18-64) concentrate in some rural locations and in segregated sectors of Dallas (e.g. southeast) and Fort Worth (e.g. southeast) (Figure 244). Small pockets of communities with 10%-20% of residents with disabilities over age 64 exist in Dallas and Fort Worth, especially where senior housing, assisted living and nursing facilities are located (Figure 245). Higher rates of disabilities occur among seniors in rural areas.

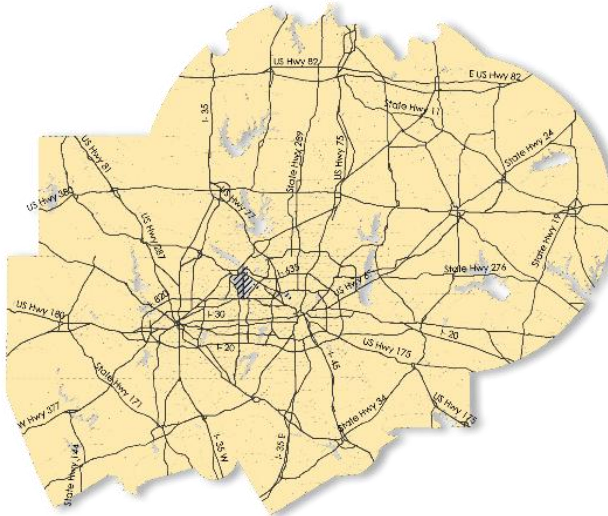


Figure 243: Percentage of population age 5-17 with disabilities, NTRHA region (ACS 2013)

Legend

- Region_Highways
- 0.0 - 10.0
- 10.1 - 20.0
- 20.1 - 30.2
- /// Null

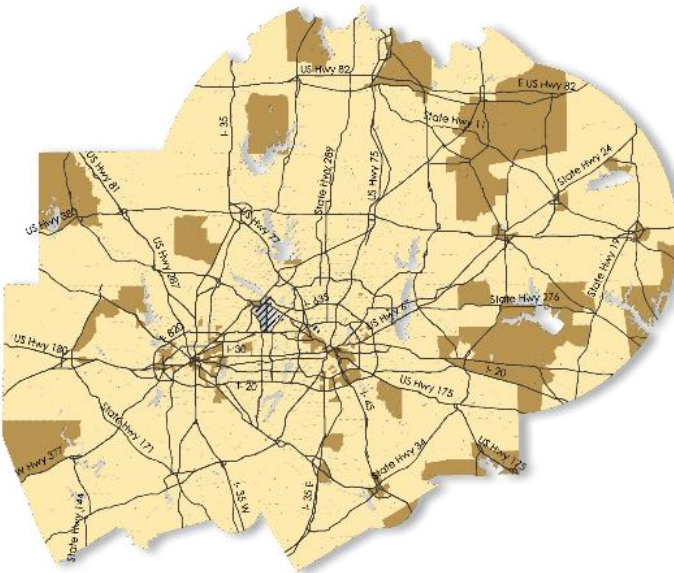


Figure 244: Percent of population age 18-64 with disabilities, NTRHA region, (ACS 2013)

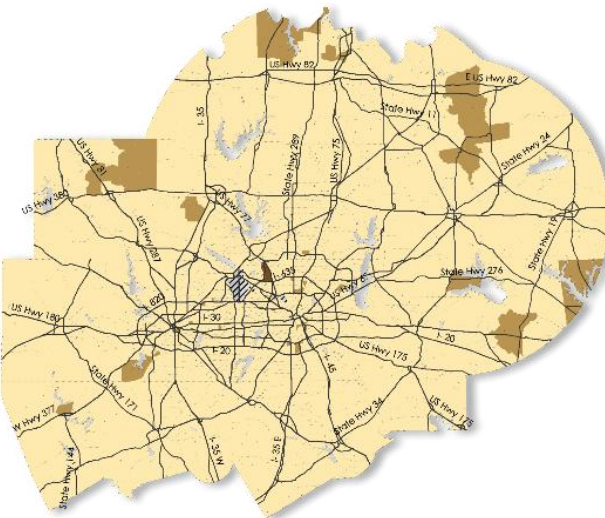


Figure 245: Percent of population over age 64 with disabilities, (ACS 201), NTRHA region

b.

Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

The following maps display rates of different types of disabilities in the general population in 2013 in the FWHS jurisdiction. The highest rates of persons with ambulatory disabilities (Figure 246) occur in east and southeast Fort Worth from downtown to I-820 and west Tarrant County. Census tracts with higher rates of persons with cognitive disabilities (Figure 247) appear in east Fort Worth. Lower income, higher minority east Fort Worth has higher rates of persons with ambulatory disabilities, cognitive disabilities, difficulties with independent living (Figure 249), self-care (Figure 250) and vision disabilities (Figure 251). Hearing disabilities (Figure 248) do not show a clear trend.

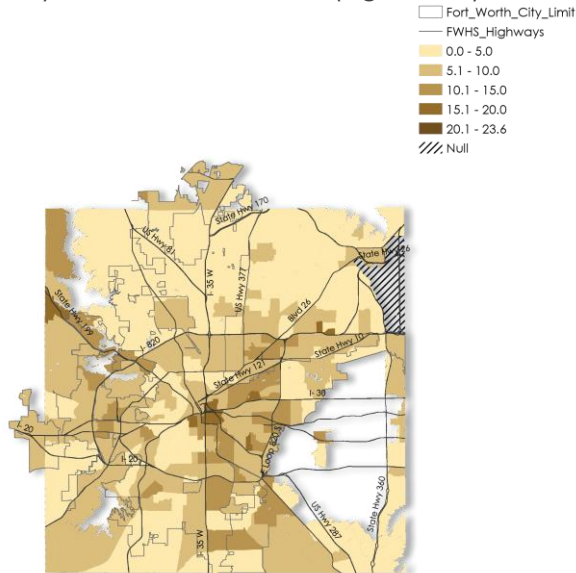


Figure 246: Percent of residents with ambulatory disabilities FWHS jurisdiction (ACS 2013)

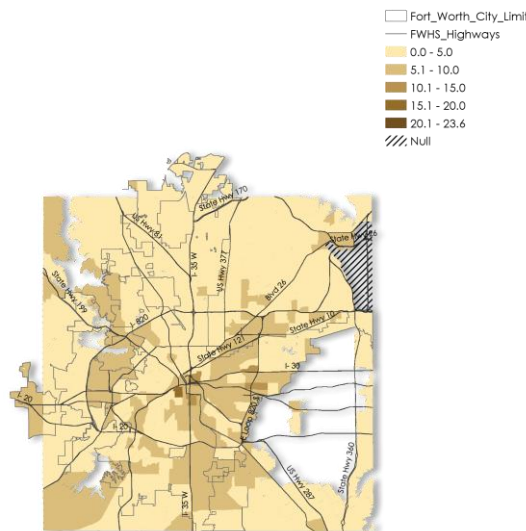


Figure 247: Residents with cognitive disabilities FWHS jurisdiction (ACS 2013)

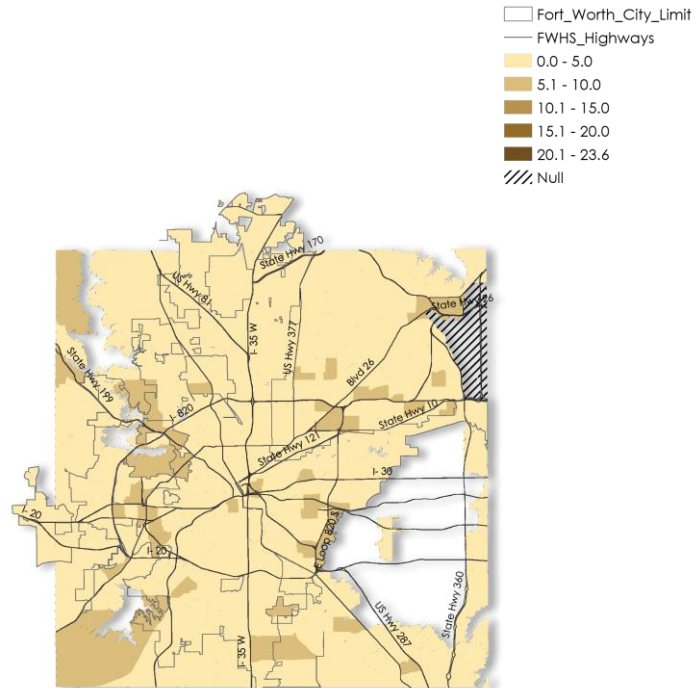


Figure 248: Residents with hearing disabilities FWHS jurisdiction (ACS 2013)

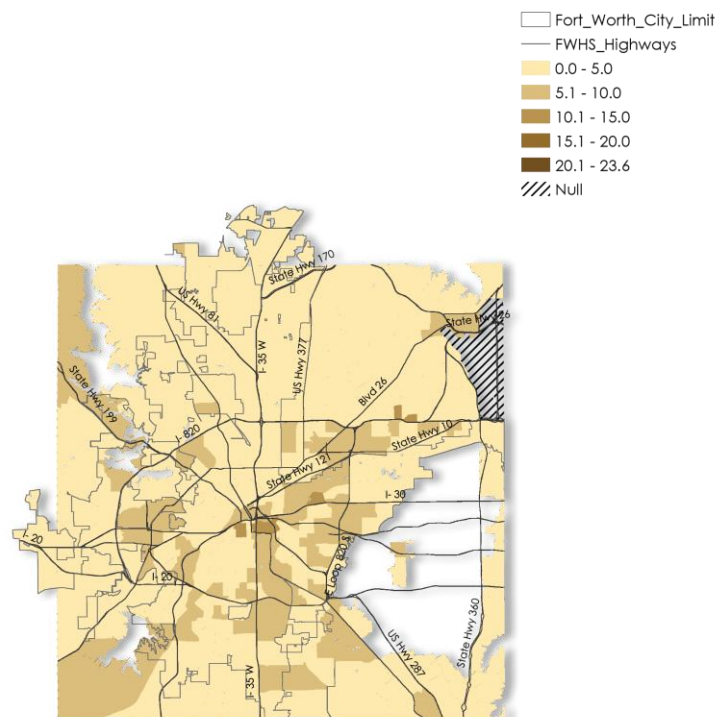


Figure 249: Residents with independent living disabilities FWHS jurisdiction (ACS 2013)

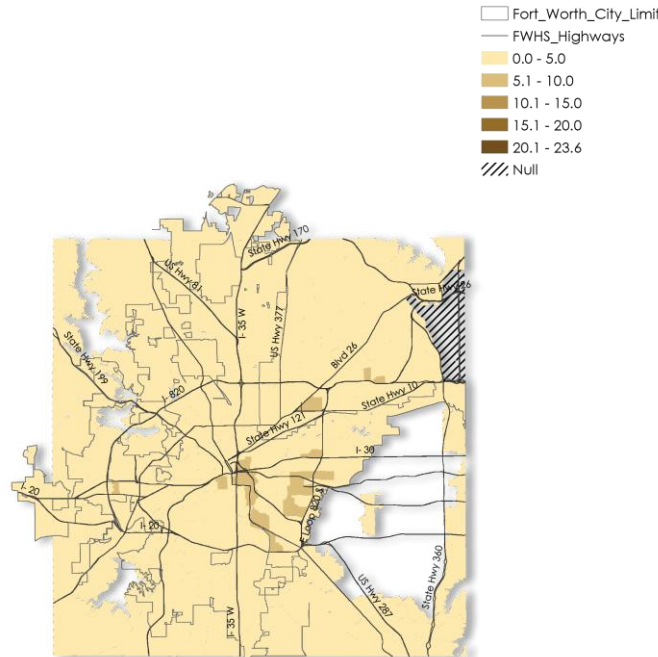


Figure 250: Residents with self-care disabilities FWHS jurisdiction (ACS 2013)

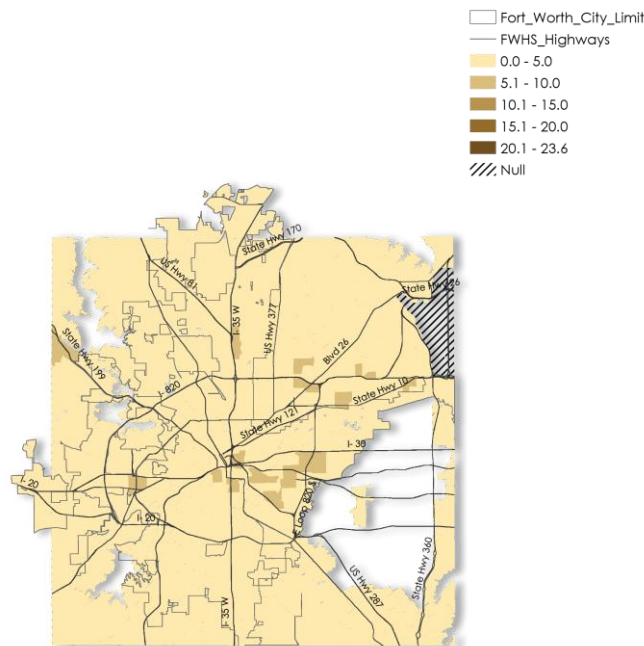


Figure 251: Residents with vision disabilities FWHS jurisdiction (ACS 2013)

Census tracts with higher percentages of persons with ambulatory disabilities (10% to 20% of residents) occur throughout the region and appear far more common than other disabilities (Figure 252) and tend to concentrate in lower income, higher minority sections of Fort Worth and Dallas, primarily southeast. Significant concentrations of person with cognitive disabilities occur in southeast and south Dallas (Figure 253). People with independent living difficulties are also present at higher rates in southeast Dallas and the R/ECAPs located in and near downtown Fort

Worth (Figure 255). Other disabilities (self-care (Figure 256), vision (Figure 257), hearing (Figure 254) show few broad concentrations at the regional level.

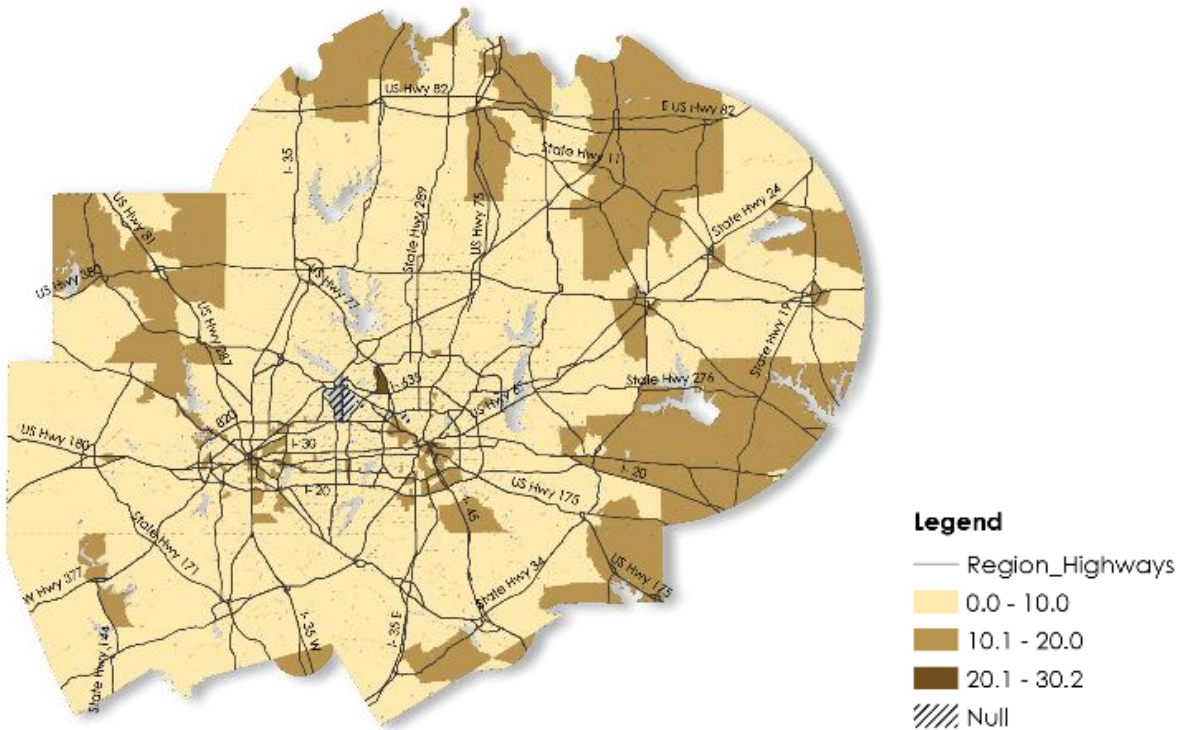


Figure 252: NTRHA region residents with ambulatory disabilities, (ACS 2013)

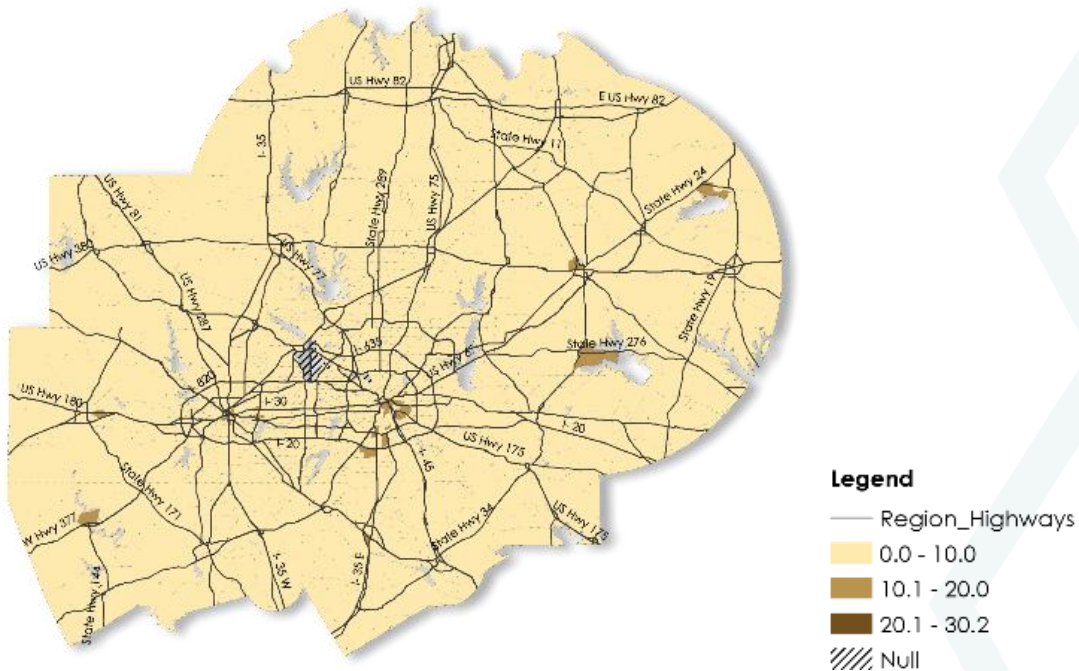
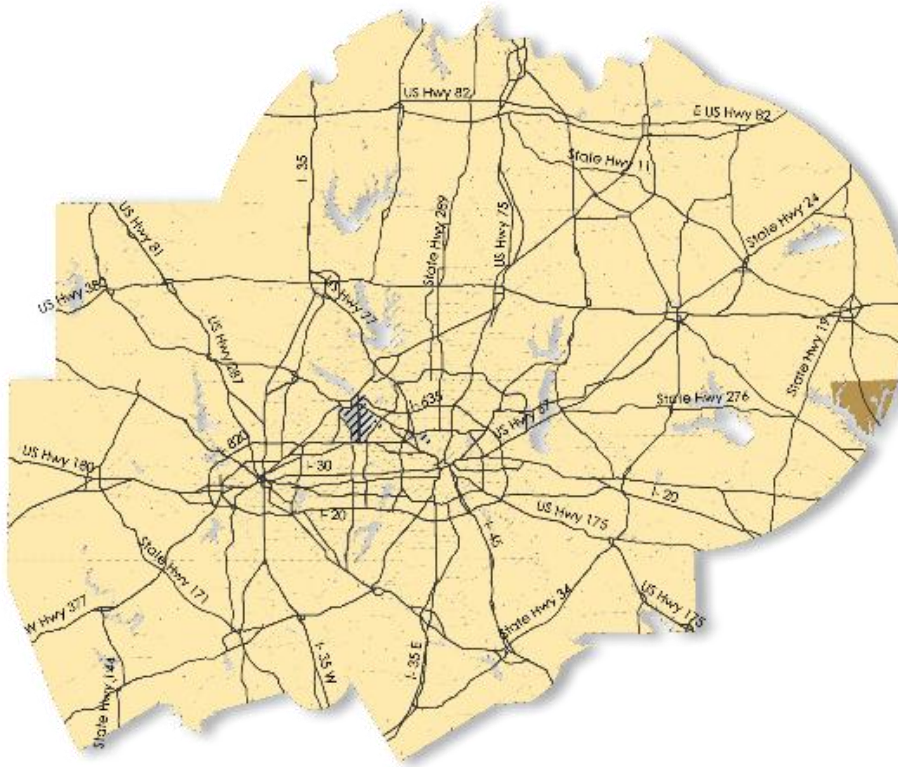


Figure 253: Cognitive Disability rates for NTRHA region (ACS 2013)



Legend

- Region_Highways
- 0.0 - 10.0
- 10.1 - 20.0
- 20.1 - 30.2
- Null

Figure 254: Hearing Disability rates for NTRHA region (ACS region)

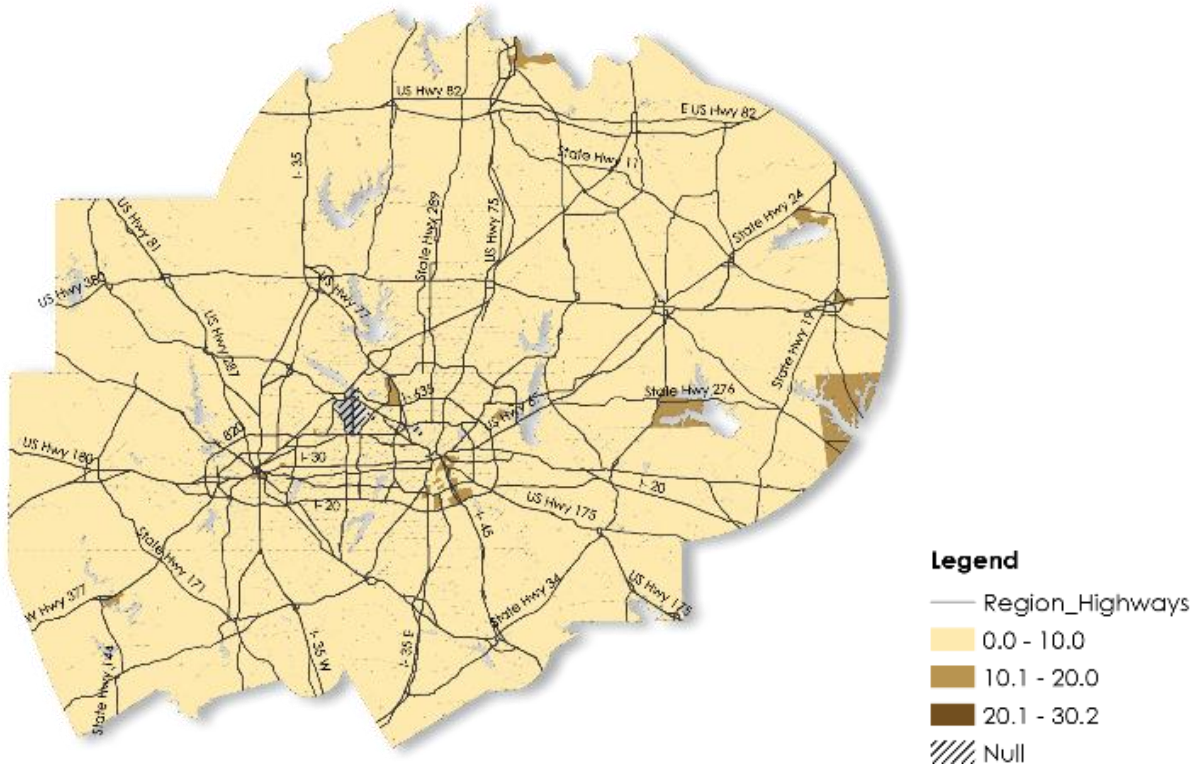


Figure 255: NTRHA region residents with independent living difficulties, (ACS 2013)

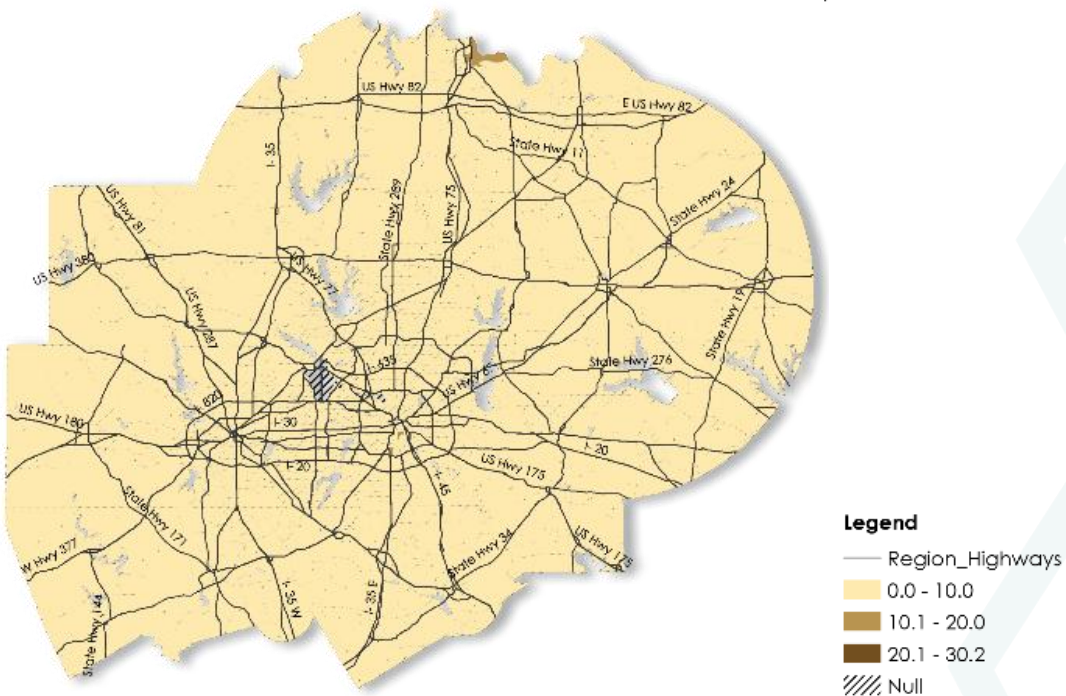


Figure 256: Residents with self-care difficulties, NTRHA region (ACS 2013)

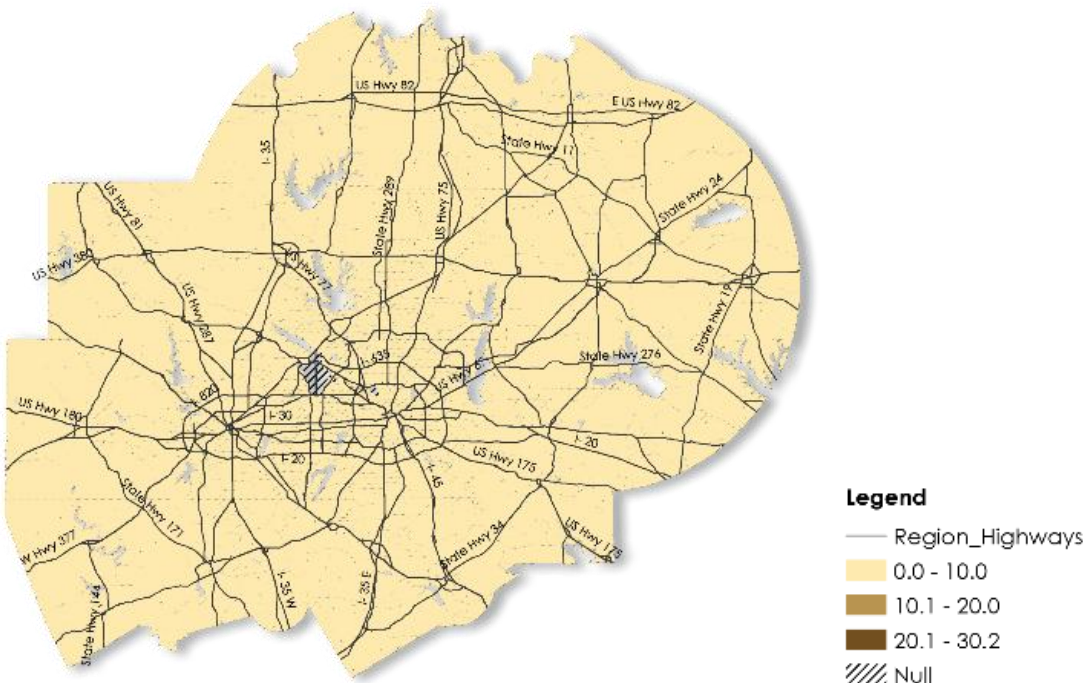


Figure 257: Persons with visual disabilities, NTRHA region, (ACS 2013)

2. Housing Accessibility

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.**

The greatest barrier to housing for persons with disabilities is affordability, according to public participation comments, driven both by high housing prices and by inadequate income. Supplemental Security Income (SSI) is a federal income support program that provides monthly payments to persons who are disabled, blind or age 65 or over and have little or no income and assets of less than \$2,000 (Social Security Administration, 2017). Monthly payments were \$733 in 2016 or 17% of area median income in Fort Worth and 12% of area median income in northeast Tarrant County. Income earned through wages decreases the monthly benefit by \$.50 for each \$1 earned (Social Security, 2018). Monthly SSI payments in the Fort Worth-Arlington MSA in 2016 equaled 105% of the cost of an average one-bedroom apartment and 92% of the cost for an average efficiency apartment (Schaak, Sloane, & Zovistoski, 2017). Forty-nine percent of very-low-income renter households in Dallas-Fort Worth (incomes 50% or less of area median income) received no government housing assistance and paid more than 50% of their income for rent and/or lived in inadequate housing (Watson, Steffen, Martin, & Vandenbroucke, 2017). Most of the complaints received by Disability Rights Texas, a federally supported advocacy organization for persons with disabilities, concerned inability to find affordable housing (Cohen-Miller, 2017).

Most participants in NTRHA focus groups designed for persons with disabilities said they could only afford to spend \$300 or \$400 per month on housing, about one-third average apartment rent. Most participants said their income was from Social Security and ranged from \$735 to

\$1,000 per month. At this level, one participant said that “finding housing and the cost of living is impossible”.

Physical housing unit accessibility presents a second set of barriers to persons with mobility disabilities. Researchers found that 45% of all housing units in western U.S. metropolitan areas in 2011 had some level of accessibility for persons with disabilities but that only 0.16% of housing units were fully wheelchair accessible. Homes built before 1950 had the lowest levels of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Ninety-two percent of housing units in the FWHS jurisdiction were built after 1950, increasing the likelihood of accessibility (U.S. Census Bureau, 2016) (U.S. Census Bureau, 2016). The vast majority of housing units built before 1950 (93%) are located in the Fort Worth census county division (41,271). Only 41% of FWHS jurisdiction housing stock (as of 2016) was built after 1990, making it subject to federal requirements that multifamily properties with four or more dwelling units be adaptable to the needs of persons with mobility impairments (Proctor, 2018; U.S. Department of Housing and Urban Development, U.S. Department of Justice, 2013). Over 300,000 housing units in the FWHS jurisdiction were built before 1990 and are not subject to ADA requirements (with exceptions). Nearly two-thirds of these older housing units are in the Fort Worth census county division.

Over 75,000 people have an ambulatory difficulty in the FWHS jurisdiction (U.S. Census Bureau, 2016). Accessible housing is insufficient in the region to meet the needs of persons with physical disabilities, especially lower income housing, usually located in neighborhoods with less security (Garnett, 2017).

Figure 258 summarizes data from the HUD 2011 American Housing Survey regarding housing accessibility for persons with mobility difficulties (Bo'sher, Chan, Gould, Karfunkel, & Liao, 2015; U.S. Census Bureau, 2016). Over 69% of households in the Fort Worth metropolitan area having a person with mobility disabilities are “level one” homes (not accessible but potentially modifiable) (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Level one homes have step-less entries, bathroom and bedroom on the ground floor or an elevator present. Sixty-two percent of the housing stock in Fort Worth is potentially modifiable to meet the needs of persons with mobility impairments. Level two homes (“livable”) have no steps between rooms or grab rails along steps and accessible bathrooms with grab bars. Almost 3% of Fort Worth area housing units are livable for persons with moderate disabilities. Less than 1% of FW housing units are estimated to be fully accessible to persons using wheelchairs. Fully accessible units have extra-wide doors or hallways; no steps between rooms; door and sink handles (no knobs); and electrical switches, outlets, climate controls, countertops and cabinets accessible to a person using a wheelchair. Figure 258 applies the proportions found in the 2011 research to the number of housing units in the FWHS jurisdiction in 2016 to estimate the number of housing units at each level (U.S. Census, 2016). Figure 258 also shows the percent of households with members who have mobility difficulties or who use a mobility device living in housing units with each of the levels of accessibility in Fort Worth (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015).

Level of accessibility	% of housing units FW MSA 2011	Est. # of housing units in FWHS jurisdiction 2016	% of households with disabled members FW MSA 2011
Total Housing Units		542,663	
Level 1: Potentially modifiable	62%	336,451	69.8%
Level 2: Livable	3%	15,357	9.3%
Level 3: Wheelchair accessible	0.23%	1,248	1.54%

Figure 258: Estimate of households with disabled persons living in homes at different levels of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015; ACS 2016)

Household members who have mobility impairments do not necessarily live in housing units that are suited to their needs or even modifiable to meet their needs. Many Fort Worth homes have the potential to be modified. The challenge is to provide modification assistance and to help persons with disabilities find and afford housing that meets their needs. The greatest barriers to full wheelchair accessibility are lack of extra-wide doorways and hallways and accessible bathrooms (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Renter-occupied units were less likely to be potentially modifiable (51%) than owner-occupied units (71%). The Appendix includes additional findings from the HUD report on the Fort Worth MSA.

Focus group and public meeting participants also emphasized the lack of access to housing that enable persons with disabilities and their families to live together in the community. Even emergency shelters lack facilities that keep families together.

b. Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Figure 259 displays the results of a query for the location of apartments for rent with wheelchair access in Fort Worth (CoStar Group, 2018). Over 1800 units advertising wheelchair accessible rooms were displayed. Few properties were identified in southeast Fort Worth and north Fort Worth within the central city, areas where most of Fort Worth's R/ECAPs are located. Properties marked with a green diamond have current availability and properties marked with a gray dot do not.

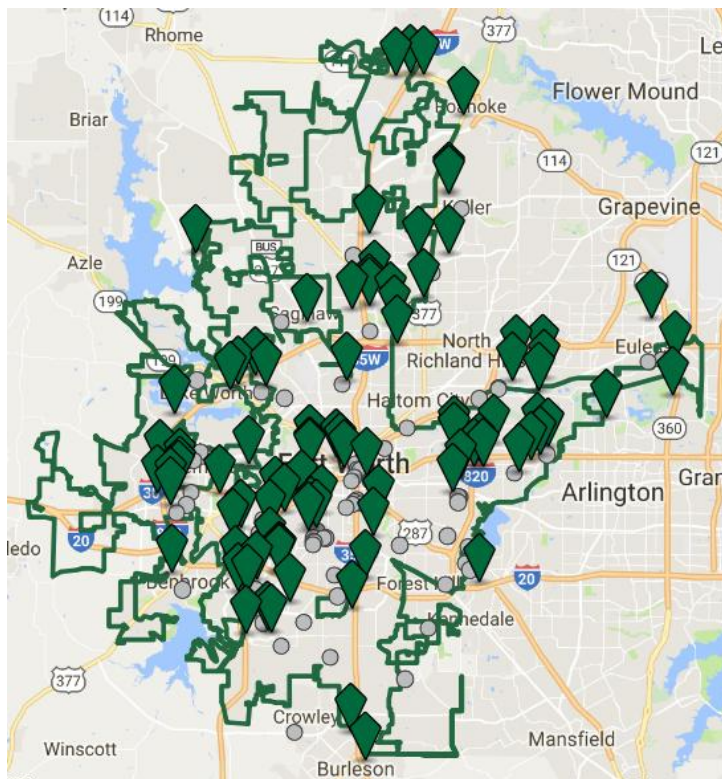


Figure 259: Locations of wheelchair-accessible apartments for rent in Fort Worth (CoStar 2018)

A review of the newest listings is displayed in Figure 260. Fifty-two currently available apartments with wheelchair access in some rooms were listed in 21 properties. Over half the properties listed are located in cities surrounding Fort Worth and Fort Worth properties are concentrated in southwest and west Fort Worth. Apartments newly listed start at \$660 for an efficiency or one-bedroom apartment. The average starting unit rent is \$979 (Costar Group, 2018). No units were listed in higher poverty southeast Fort Worth or north Fort Worth within the central city.

Apartment Name - Newest listings	City	Zip Code	Lowest Rent Available
Copper Chase Apartments	Arlington	76006	\$ 1,179
Heights of Benbrook	Benbrook	76126	\$ 825
The Reserve at Village Creek	Burleson	76028	\$ 1,025
Loffon Place	far east Fort Worth	76120	\$ 695
Trinity Bell Gardens Apartments	far east Fort Worth	76118	\$ 1,184
Western Station	far north Fort Worth	76137	\$ 1,120
Oxford at Lake Worth	far northwest Fort Worth	76108	\$ 860
Lakeview	far northwest Fort Worth	76135	\$ 869
Riverhill	Grand Prairie	75050	\$ 806
Dakota Place	Hurst	76053	\$ 795
The Sovereign	Keller	76244	\$ 960
Sagestone Village	Keller	76244	\$ 990
Grand Estates@Keller	Keller	76248	\$ 1,093
Southern Oaks	southwest Fort Worth	76132	\$ 800
The Canyons	southwest Fort Worth	76116	\$ 948
The Reserve on Willow Lake	southwest Fort Worth	76109	\$ 1,099
4000 Hulen Urban Apartment Homes	southwest Fort Worth	76107	\$ 1,239
Marquis at Bellaire Ranch	southwest Fort Worth	76109	\$ 1,338
Palm House Apartments	west Fort Worth	76116	\$ 660
The Trinity Residences	west Fort Worth	76107	\$ 938
Bell Lancaster	west Fort Worth	76107	\$ 1,120

Figure 260: New listings for apartments with wheelchair accessible rooms (CoStar 2018)

C. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Very little information documents the availability of publicly supported housing accessible to persons with different disabilities. The North Central Texas Aging and Disability Resource Center maintains a list of housing by city (North Central Texas Council of Governments, 2018). Figure 261 lists assisted living properties in the FWHS jurisdiction offering care for persons who must have supervision through the night and require assistance for emergency exit (known as Type B). Over 1,600 units in 19 facilities are located throughout the FWHS jurisdiction in 10 cities. Assisted living housing units in the DFW region cost an average of \$3,129 per month and are unaffordable to low-income seniors living in publicly supported housing with average annual incomes of \$10,000 (Hubanks, 2017; Caring, Inc., 2018). Caring.com lists 61 assisted living facilities (including those serving persons who do not need overnight supervision) in Fort Worth and the surrounding area. Availability and affordability of assisted living falls far short of the over 26,000 residents with self-care difficulties (U.S. Census Bureau, 2016). The NTCOG ADRC lists 2,330 publicly supported units of assisted living of all types in 39 properties.

ORGANIZATION/PROPERTY NAME	City	Units
Elmcroft of Bedford	Bedford	118
TCG Benbrook Assisted Living	Benbrook	170
Covenant Place of Burleson	Burleson	80
Greenbriar Mansion	Fort Worth	16
Heritage Square	Fort Worth	85
Sunrise of Ft. Worth	Fort Worth	105
Tandy Village	Fort Worth	160
Westchester Plaza	Fort Worth	300
Emeritus at Tanglewood Oaks	Fort Worth	116
Splendor Hills Incorporated	Grand Prairie	8
Emeritus at Holiday Lane Estates	North Richland Hills	60
Autumn Leaves of Southwest Ft. Worth	Fort Worth	46
Saint John's Residential Care Home	Fort Worth	6
Community Assisted Living of Grand Prairie Inc.	Grand Prairie	16
Atria Grapevine	Grapevine	110
Autumn Leaves of Fossil Creek	Haltom City	46
Mustang Creek Estates - Building E	Keller	14
Ashwood Assisted Living	North Richland Hills	120
Whitley Place	Keller	65

Figure 261: Type B assisted living in FWHS jurisdiction (NCTCOG 2018)

Intermediate care facilities for persons with intellectual and developmental disabilities (ICF/IDD) provide housing and treatment in properties with four or more beds (U.S. Centers for Medicare & Medicaid Services, 2016). No additional funding has been provided by the state for ICF/IDDs for several years (Texas Health and Human Services, 2018). The NCTCOG ADRC lists 58 ICF/IDDs in the FWHS jurisdiction that are publicly supported through Medicaid (North Central Texas Aging and Disability Resource Center, 2018). Subject matter experts point out that, when people move to North Texas, they bring with them their family members with intellectual disabilities, increasing the need for services (LeoGrande, 2017). Over 42,000 people with cognitive difficulties under the age of 65 live in the jurisdiction of FWHS (U.S. Census Bureau, 2016). Three percent of the U.S. population has intellectual and developmental disabilities and there is not enough publicly supported housing to meet this need (Garnett, 2017).

The NCTCOG ADRC lists 118 publicly supported properties with some availability of affordable housing for persons with disabilities (North Central Texas Aging and Disability Resource Center, 2018). These properties are located in only 17 of the 40 cities within Tarrant County. Sixteen of the properties are restricted to seniors or elderly residents. The properties are funded by LIHTCs, Rural Rental Housing, HOME, Section 202 (elderly), Section 811 (disabilities), multifamily bonds, the Texas Credit Assistance Program, project-based vouchers (PBVs), Housing Choice Vouchers (HCVs) and the Assisted Housing Disposition Program (AHDP). Figure 262 shows the total number of units identified as accessible in the FWHS jurisdiction on the NCTCOG ADRC inventory. This shows the difficulty of finding information about accessible units.

	Totally Accessible	Partially Accessible	Wheelchair access
One BR	0	71	70
Two BR	51	76	108
Three BR	10	19	58
Four BR	0	1	0
Total	61	167	236

Figure 262: Accessible units in publicly supported housing FWHS jurisdiction (NCTCOG ADRC 2018)

Publicly assisted housing fails to meet the needs of persons with disabilities across the region, according to input from public comments and consultations. A housing navigator with the Aging

and Disability Resource Center in Tarrant County explained that LIHTC developments were not being built with sufficient access for persons with disabilities and were largely unaffordable to those who could not pay \$700 in rent and double or triple deposits (Poppelreiter, 2017). She reported continually receiving phone calls from people looking for rents under \$700 per month, but the only places offering them have one- and two-year waiting lists. Assisted living settings have rules that prevent a family member from living with the person with disabilities. This is especially problematic for persons who require 24-hour assistance. Other participants in focus groups and public meetings stated that it was very difficult to get into housing programs. One participant stated that, as a single man receiving approximately \$740 in Social Security disability income, he was always at the end of the line for publicly assisted housing (Gooden, 2017). He said that when he had finally gotten to the head of the line, the apartments that were proposed to him were located in communities with no public transportation and poor access to services. He felt that there needed to be a “separate line for people who need ADA compliant housing” because it is useless to stay on a waiting list only to find that there is no housing that meets your needs.

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a.

To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

The lack of affordable, accessible housing can force persons with disabilities into nursing homes when they might be able to live independently in the community with supportive services (Gooden, 2017). Almost all participants in focus groups expressed the desire to live in an integrated setting in the community with a mix of persons with and without disabilities. Parents and guardians of persons with intellectual and developmental disabilities (IDDs) who participated in NTRHA focus groups were currently supporting their adult children in their own homes and expressed concerns about whether their children could continue to live independently when the guardians were no longer available. Some of these guardians expressed concern that their adult children would never be able to continue to afford to live in the communities in which they grew up and had developed social connections with clubs, Special Olympics teams, jobs and friends. Medicare/Medicaid-certified nursing homes were home to 6,058 people in Tarrant County in December 2017 with an average bed occupancy rate by county precinct of only 71.7% (Texas Health and Human Services Commission, 2017). Seventy-four nursing facilities are certified to accept both Medicaid and Medicare in Tarrant County (Texas Health and Human Services, 2018).

Figure 263 compiles information concerning facility-based long-term residential care options for persons with disabilities in Tarrant County (Texas Health and Human Services, 2018)²⁰. Facility-

²⁰ Data in this report about the availability of residential options for persons with disabilities comes from state and federally funded organizations responsible for documenting programs for persons with disabilities. It is not an exhaustive assessment of the availability of accessible housing. Some missing data may be due to lack of information. Different organizations offer different listings (e.g. NCTCOG ADRC and HHS). There is very little publicly available data on the accessibility of housing units, even in publicly supported housing. All federally assisted newly constructed housing developments with five or more units must design and construct 5% of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities. (U.S. Department of Housing and Urban Development, 2018).

based care involves a greater degree of segregation than community-based care. Options for persons with disabilities are limited, especially for those with intellectual and developmental disabilities (ICF/IID). Nursing facilities are the most available yet offer the most segregated living setting. Nursing facility placement for persons with disabilities has been shown to contribute to physical and mental deterioration in environments where sexual assault and abuse are problems (Cohen-Miller, 2017). Advocates find serious problems with Texas nursing homes, including licensing violations, lack of state enforcement and sanctions and quality of care deficiencies (AARP, 2017). Most assisted living facilities (Type B, 73%) serve people with significant disabilities who require monitoring and assistance throughout the night and are unable to evacuate in case of emergency without assistance.

Facility-Based Care Facilities	Number	Beds/Facility	Total Beds
Assisted Living Facilities	133	4 to 170	6,672
Nursing Facilities	76	2 to 225	6,833
ICF/IID	83	6	498

Figure 263: Facility-based residential care for persons with disabilities in Tarrant County (HHS 2018)

None of the participants in focus groups designed for persons with disabilities lived in segregated housing. Most lived in communities where there were very few other people with disabilities. Participants said that they would like to live in communities where there were more people with disabilities than the places they currently lived. Participants stated that people with disabilities have “limited ways of finding each other” in the community and that this situation was undesirable. The desire to be able find other persons with disabilities, however, should not be interpreted as indicating that the participants were expressing a desire for segregated housing. Participants clearly prefer community-based, integrated housing, but, community-based housing can also be very isolating without transportation, services and social supports. Participants said they desired to be in “community” with other people like them but within an integrated, community-based setting.

Some focus group participants presented ideas for mutually supportive communities or properties for persons with disabilities and their families, in a community-based setting. One focus group participant had designed a small community of “villas” where persons with disabilities could live in their homes with their own families while sharing personal care assistants and other resources. Some families with higher incomes are developing and using “ranches” that provide supported independent living for persons with IDD, an example of the movement toward protected, community living for persons with disabilities (Down Home Ranch, 2018; Marbridge Foundation, 2018). Costs to live in these communities are \$3,600 per month, private pay only. Families in public participation stated that even these programs were not right for everyone and, due to limited availability, often required individuals to live two to three hours away from family. Some participants are actively seeking resources to purchase homes to share with other families to allow their family members with self-care limitations to live independently, even after their guardians are no longer living. Participants felt that living in close proximity to other persons with disabilities yet within an integrated community helped to fight isolation.

Group homes, sometimes called community homes, for persons with disabilities are sometimes subject to special restrictions for spacing or fire safety in local zoning ordinances, thus affecting their location. A body of case law now maintains that restrictions on family homes used to house small groups of persons with disabilities may not exceed restrictions on other family homes unless

there is a legitimate government interest (Cohen-Miller, 2017). A one-half mile separation between community homes was ruled overly restrictive (U.S. v. City of Beaumont, Texas (E.E. Tex.), 2016). The City of Fort Worth Code of Ordinances refers to the Texas Human Resources Code Chapter 123 in its regulation of community homes, including the requirement that such homes not be located closer than half a mile from another community home (City of Fort Worth, 2018; State of Texas, 2018).

b.

Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Medicaid and Social Security disability income are the most important resources for persons with disabilities in Texas (Garnett, 2017). Texas offers many programs to provide housing and supportive services to persons with disabilities varying by age and type of disability; however, most are not entitlement programs and have extensive waiting lists. Texas publicly supported options include the following (Texas Health and Human Services, 2018):

- State Supported Living Centers for persons with Intellectual and Development Disabilities (IDD) (cost \$232,000 per person per year, 60-460 residents); none located in Collin County (Texas Council for Developmental Disabilities, 2017)
- Intermediate Care Facilities for persons with Intellectual and Development Disabilities (cost \$54,000 per person per year, range from six- to 60-person facilities or homes) (Texas Health and Human Services, 2018)
- Home and Community-based Services (HCS); group homes for up to four IDD residents (cost \$63,000 per person per year); includes supported home living services; 90,847 on state wait list, wait length up to 13 years (Texas Health and Human Services, 2018)
- Supportive Services provided to persons with disabilities living independently or with family members in the community:
 - Community Living Assistance and Support Services (CLASS) (cost \$15,000 per person per year) (64,906 on Texas state waiting list, length of wait up to 12 years)
 - Consumer Managed Personal Attendant Services (sliding scale with some cost paid by consumer) (optional program varies by county)
 - Deaf Blind with Multiple Disabilities (357 on waiting list, length of wait up to two years)
 - Medically Dependent Children Program (18,018 on waiting list, up to five years wait)
 - Primary Home Care, Family Care, Personal Care Services, Community Attendant Services programs – provide personal assistant services; no waiting list, limited services
 - Texas Home Living for persons with IDD (70,714 on waiting list, length of wait up to nine years)
 - Star Plus – managed care (10,116 on waiting list, wait one year)
- Independent Living Centers – provide advocacy, information, referrals, training, peer counseling, transition support from nursing facilities to community, assistive equipment loan, includes a regional network of offices, including REACH of Fort Worth (REACH, Inc., 2017)
- Aging and Disability Resource Center of Tarrant County – maintain a network of housing assistance providers through partnerships with government and nonprofit agencies; provide referral assistance and resource links, including housing (Aging and disability resource center of Tarrant County, 2017).

- Fort Worth Housing Solutions (no supportive services)– public housing and Housing Choice Vouchers (dependent on market availability of accessible units)
- Project Access Program – for persons transitioning from nursing homes to independent living who also qualify for the Tenant Based Rental Assistance program; must be HCV or HOME TBRA availability; provides relocation contractors to coordinate with service coordinators (Texas Department of Housing and Community Affairs, 2018)
- Oxford House – Oxford House is a nonprofit corporation offering a network of peer-managed sober-living homes for persons recovering from alcohol and drug addiction (Oxford House, Inc., 2018). Twenty Oxford Houses are available in Fort Worth (Oxford House, Inc., 2018).
- Community for Permanent Supported Housing – CPSH is a nonprofit organization that offers training and assistance to persons with intellectual and developmental disabilities (IDD) and their guardians who are preparing to live independently in the community. Project Independence is a transition program that guides guardians through the process of finding housing and supportive services for community-based living (Community for Permanent Supported Housing, 2018).
- United Way of Tarrant County – UW coordinates programs to help persons with Alzheimer's disease remain in community-based housing for as long as possible (United Way of Tarrant County, 2018). The Alzheimer's Association of North Central Texas provides one-on-one coaching and support to family caregivers. Easter Seals of North Texas provides weekly respite care that allows family caregivers to take breaks. The Area Agency on Aging provides a training program that teaches family caregivers to manage stress.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

Government services and facilities

Participants in public meetings and focus groups identified accessibility to government services and facilities as a significant barrier to opportunity both in general and in the following specific ways:

- Areas on public transit vehicles designed for wheelchairs do not fit modern wheelchairs, especially those that are electrically operated and have accessories for special needs. They are too small and seem to be getting smaller.
- Handicapped parking spaces do not fit modern van ramps. For example, at Fort Worth City Hall, spaces for persons with disabilities will not accommodate the seven feet needed to accommodate modern ramp extensions from vans. One participant stated that he had to use two parking spaces at the back of the lot at the Hazel Harvey Peace Center for Neighborhoods to find parking that would accommodate his van and wheelchair ramp. Participants stated that there was insufficient handicapped parking available around Fort Worth City Hall.
- A participant who serves on an advisory committee for a new public coliseum stated that the building seemed to be designed for people aged 18-35 without disabilities.

- Participants with disabilities from east and northeast Tarrant County stated that there was a lack of accessible community recreation centers, both in physical access and in programming that met the needs of persons with disabilities.

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Participants expressed many concerns over the inaccessibility of public infrastructure. One participant expressed the concern that most single-family neighborhoods were not designed for walk-ability and that the lack of walk-ability affected the health of residents as well as posing challenges to persons aging in place and persons with disabilities. The standard manuals from the Institute for Traffic Engineering that guide municipal planning, according to one participant, still favor high-speed traffic over pedestrian and disability-friendly environments. Multiple participants commented that the inaccessibility of public infrastructure was a growing problem with the aging of the population and the increase in persons with disabilities. Additional comments:

- While main streets received attention for improved accessibility, side streets were largely inaccessible.
- Downtown Fort Worth is insufficiently accessible to persons with disabilities, preventing them from enjoying its amenities. Bars and restaurants in Fort Worth's urban villages (e.g. Magnolia Street) are also insufficiently accessible with tables that are too close together for people with walkers or wheelchairs to pass.
- Inaccessibility of public infrastructure around places of employment presents barriers to opportunity.
- Bathrooms designed for persons with disabilities are often in use by persons without disabilities and unavailable for extended periods in both public and private buildings.
- Inaccessible (or absent) sidewalks, crosswalks and crossing signals were identified as presenting problems for persons with disabilities, including persons with intellectual and developmental disabilities. These barriers also contribute to lack of access to public transit stops. Participants recognized that lack of accessible sidewalks is also a problem for families with children and the populace in general.

Transportation

Participants stated that lack of public transportation has a disproportionate impact on persons with disabilities due to both low-income and inability (for some) to safely operate a private auto. One focus group participant (a resident of one of the small cities inside Tarrant County) understood that it was prohibitively expensive for the Fort Worth Transportation Authority (Trinity Metro) to maintain fixed routes through small nonparticipating cities that lack municipal revenue to contribute to public transit. Catholic Charities (a large local nonprofit) offers "demand response" transportation in Tarrant County outside the Trinity Metro service area and service delivery hours, taking over this service from the Red Cross in 2012 (Catholic Charities Fort Worth, 2015). The service produced over 80,000 trips in 2017, but one focus group participant stated that this was inadequate to fill the gaps in Trinity Metro services (Catholic Charities Fort Worth, 2017).

Complaints about the availability, effectiveness and affordability of paratransit services for persons with disabilities were common in public meetings and focus groups. Paratransit services were described as "not friendly", requiring appointments to be made by 5 pm the previous day

and requiring at least 90 minutes of travel time (Fort Worth Transportation Authority, 2018). Participants reported that paratransit services are not reliable, often causing missed appointments. Guardians of minors with disabilities reported worrying about the level of independence their children would have to engage in further education, jobs and recreation, once they exited the public school system and/or their guardians have passed away. Participants said the lack of public transportation impacts independence as well as the ability for persons with disabilities to socialize with friends who also may have disabilities, creating further isolation. Focus group members reported that lack of transportation was a significant barrier to access to food shopping for seniors with increasing levels of disability and low-incomes. A former MITS driver (Trinity Metro paratransit share ride system), himself a person with disabilities, stated that the reason it takes “3 to 4 hours to go down the road” is that there is a lack of drivers and that buses often sit idle while one driver is scheduled to handle multiple trips.

The cost of MITS was also a common complaint, especially considering fare increases effective August 2017 (Fort Worth Transportation Authority, 2017). A community legal advocate participating in a focus group on disabilities said that the environmental justice impact assessment of the fare increase was inadequate. Persons with disabilities must now pay \$4 one way to ride MITS shared ride system. A focus group member believed that attendants could no longer ride paratransit with their client without paying a fare, but the Trinity Metro website states that attendants still ride paratransit for free (Fort Worth Transportation Authority, 2018). Transportation to one medical appointment now costs \$8 round trip on MITS or 1% of one month's SSI check, limiting the ability of persons with disabilities to use MITS for any but the most critical trips. A focus group participant reported that, even if the driver fails to get riders to their appointment on time, they are still charged for the trip. One participant stated that the area on the paratransit vehicles designated for wheelchairs was also not adequately sized for the number of persons with wheelchairs and the size of modern wheelchairs.

A senior planner with The T understood that persons with disabilities would rather use fixed-route than shared-ride transit and this was backed by focus group comment. Persons with disabilities reported that they did not have accessible bus stops nearby and some reported not having access to on-demand transit. Public transit authorities must provide door-to-door transit for persons with disabilities within three-quarters of a mile of any fixed-route transit (Dupler, 2017). Paratransit services are very expensive to operate when compared with fixed-route transit (Comfort, 2017). Lack of passable sidewalks contributes to the problem.

Participants summarized the importance of transit by saying that “housing without transportation is a prison” for persons with disabilities.

Proficient schools and educational programs

Texas public schools must provide services to children and youth with disabilities until age 21, including transportation (Garnett, 2017). Twenty-two comments were collected related to lack of access to proficient schools for persons with disabilities. Specific complaints focused on the lack of post-secondary education, especially job training. One participant stated that she wished that Tarrant County College would offer technical training courses that were adapted slightly for persons with intellectual and developmental disabilities. Others expressed a need for more supportive services available on campuses. One family explained that they moved their child with intellectual and developmental disabilities into a private (K-12) school with smaller class sizes because the public school had very low expectations for achievement and did not provide educational opportunities that met their child's abilities.

Jobs

In 2015, the Texas Legislature mandated the transition of responsibilities from the Department of Assistive and Rehabilitative Services (DARS) to the Texas Workforce Commission and the Department of Health and Human Services, culminating in the elimination of DARS (Texas Workforce Commission, Texas Department of Assistive and Rehabilitative Services, Texas Health and Human Services Commission, 2016; The State of Texas, 2016). The transition was to begin in 2016 and complete by 2019. Stakeholders in public engagement expressed concern over the success of the transition (Garnett, 2017). Participants in focus groups for persons with disabilities identified the lack of supported employment opportunities, including supportive services and accessible environments in the workplace as a barrier to employment.

Texas Medicaid and the Texas Workforce Commission (TWC) offer supported employment programs in which persons with disabilities get assistance to find and maintain competitive, integrated employment (Texas Council for Developmental Disabilities, 2018). Texas Medicaid programs began to offer supported employment in 2013 but less than 2% of eligible consumers have been approved for or received these services. TWC offers supported employment by contracting with community rehabilitation providers (WorkReady Texas, 2018). Medicaid-supported employment services are mediated by managed care companies who appear to have little understanding of these benefits (Garnett, 2017). State and federal law allows persons with disabilities working in sheltered workshops to be paid by the piece of work produced as long as the amount paid per hour of work is at least minimum wage. Sheltered workshops are available in the region in Tarrant County only (AMFIBI, 2018). Piece rate employment can provide important benefits to persons with disabilities but the depressed wages add to problems with the ability to afford housing (Garnett, 2017).

Participants in focus groups stated that persons with disabilities suffer from job loss leading to eviction and loss of housing. One of the participants (herself a person with a disability) had founded and operated a successful employment agency for persons with disabilities. She talked about the need for employment for persons with disabilities and opportunities for job training, perhaps on a sliding scale. She said, "Employment is part of being independent". Another guardian of a person with IDD shared that her son had been bullied on the job, increasing his anxiety problems and forcing him to quit the job. Her son had gotten the initial job through the Department of Assistive and Rehabilitative Services (Texas DARS). DARS helped him to find a subsequent job successfully with job search and job coaching services. The owner of the employment agency talked about a friend with disabilities who worked for a company that allowed him to have a flexible work start time for days when his attendant was late or unavailable and he was delayed. Participants indicated that not enough companies are willing to make these kinds of accommodations and affirmed the need for more customized employment opportunities and on the job supportive services. Many participants stated that they did not have access to a workplace in which they could "get around and work in safely". Texas law allows employers to pay piece rate as long as total pay for each seven-day period equals at least the Federal minimum wage for the number of hours worked (Texas Workforce Commission, 2018). Texas' State Use program permits state agencies to purchase goods and services from companies that will hire persons with disabilities to do at least 75% of the work on a state contract (Texas Workforce Commission, 2018; Batheja, 2015). The program also allows these companies to pay employees with disabilities less than the federal minimum wage, sometimes as little as 61 cents per hour to adjust for lower productivity (Walters, 2016). A guardian with a son with IDD participating in a State Use program stated that persons with disabilities need to be "paid a decent wage – not 8 cents a bag of folded towels".

b.

Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers

FWHS

The Fair Housing Act requires that owners and landlords of multi-family housing (excluding owner-occupied properties with four or fewer units) permit the modification of existing premises at the expense of the renter if required to permit the full enjoyment of the property, especially by persons with disabilities (U.S. Department of Justice; U.S. Department of Housing and Urban Development, 2008; Disability Rights Texas, 1996). FWHS documents its process for requesting reasonable accommodations in its Admissions and Continued Occupancy Policy (ACOP) (Fort Worth Housing Solutions, 2017). The policy is posted in all administrative offices, on its website and at all properties (Fort Worth Housing Solutions, 2018). Persons must request a reasonable accommodation but may do so in writing, orally or by any other effective means of communication. FWHS documents all requests in writing regardless of method of communication. FWHS verifies that the requestor has a disability, as defined by law, by receipt of the following evidence:

- SSI or SSDI, or
- Verification form completed by a qualified professional with knowledge of the disability

FWHS also requires that a competent professional verify in writing that the accommodation is required by the disability in order for the person to have equal access to housing programs. FWHS replies to each request in writing. Requests will be granted if they meet a need presented by a verified disability and do not create undue financial or administrative burden or alter essential functions of the agency. FWHS may propose an alternate solution in the event a modification is judged to pose an undue financial or administrative burden. Requestors may appeal any requests denied through the FWHS process for complaints, grievances and appeals. Persons affected by the FWHS RAD relocation process use the agency's reasonable accommodation request process if the proposed relocation presents barriers to their enjoyment of housing based on a disability (Fort Worth Housing Solutions, 2018). The Tarrant County Housing Assistance office also maintains a process for requesting a reasonable accommodation available on its website (Tarrant County, 2018).

Fort Worth

The City of Fort Worth maintains a process to allow residents to request a reasonable accommodation to modify the City's zoning, land use and other regulations, rules, policies and practices for residential property to ensure equal access to housing for persons with disabilities (City of Fort Worth, 2018). The City established an initiative called Walk Fort Worth to develop a "more pedestrian friendly environment for those who travel by foot, wheelchair, motorized scooter or other mobility aid" that includes a plan for sidewalk, ramp and pedestrian safety improvements (City of Fort Worth, 2014).

c.

Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

Low income is the primary barrier to homeownership for persons with disabilities. Persons with disabilities have virtually no possibility of owning a home due to cost (Cohen-Miller, 2017). Participants in public engagement events echoed this statement. Persons who are aging-in-

place also find it difficult to maintain their homes and continue to meet city codes for property maintenance without assistance or reasonable accommodation (Cohen-Miller, 2017).

Families contemplate buying homes for their family members with disabilities, but the additional costs of maintaining a second home (taxes, mortgage, utilities) make the project unaffordable, according to participants in focus groups. The Home and Community-based Services (HCS) program provides services to persons with IDD living with their own family, in their own home or other community-based housing such as small group homes (Texas Health and Human Services, 2018). Program participants in shared housing split all costs of room and board for the property and pay for them out of SSI benefits. SSI does not supply sufficient income for homeownership. Participants say that HCS providers in their community have also been having difficulty finding affordable homes to purchase.

Project-Based Vouchers are an avenue by which developers or families could buy homes for group living and rent them to persons with disabilities and receive Section 8 rent subsidies to pay the difference between what SSI recipients can afford and the cost of operating the home. Section 8 does not normally permit rental of housing to family members, but the practice may be approved by the housing authority as a reasonable accommodation for a family member with disabilities.

Participants in focus groups said the only way their family members with disabilities could own a home would be for a group of families, with compatible persons with disabilities, to buy a home together. Participants say that finding compatible residents as well as compatible families who will share responsibilities equally is a challenge.

5. Disproportionate Housing Needs

a.

Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

The greatest amount of public input on disproportionate housing need for persons with disabilities came from discussions about the **lack of in-home or community-based supportive services**. The following needs emerged from public meetings and focus groups:

- Medical support, especially in-home or community monitoring for emergencies
- Supervision for safety
- Assistance to get out of bed, dress and prepare to leave the home for employment or other community activities
- Day activity programs to prevent isolation and support community integration;
- Legal support and guardianship-type services that enable supported decision-making and choice
- Transportation
- Need for housing modifications
- Safe neighborhoods for vulnerable people
- Supported recreation opportunities

Many participants discussed the importance of recreation and supports that enabled persons with disabilities to get out into the community. Guardians stated that persons with disabilities need day programs that enable them to be productively active in the community shopping, dining, attending community events and recreation. During a focus group, participants

(guardians and persons with disabilities) were asked to draw their “dream home” and their ideal community. One of the participants with intellectual and developmental disabilities filled her drawing with recreation and activities, including sports, music-making and job training opportunities. These comments were highly related to the desire to live in an integrated community that was not like “an institution”.

Participants stated that Texas Medicaid waiver programs were insufficient to provide the supportive services needed. One guardian was very frustrated because his son, a person with intellectual and developmental disabilities who is not able to live independently without support, had been dropped completely from waiver programs because he did not need skilled nursing services and the guardian had no idea what to do about it. Participants emphasized the importance of housing that is integrated with services and supports and maximizes community integration.

Persons with multiple disabilities, including mobility and respiratory problems find housing options especially limited. The number of nursing homes that will accept ventilator dependent patients is highly limited in Texas and quality of care has been deficient leading to closures (Hopper, 2002; Associated Press, 2007; Hearst Newspapers LLC, 2007). Medicaid waiver programs provide for community-based housing for persons with ventilators, but the transition is challenging. The person must have affordable housing to go to that is accessible and can support the physical demands of the ventilator equipment. The person must also be able to hire attendants who are able to learn the challenging tasks of maintaining ventilator equipment and supporting respiratory health (Hill & Brewer, 2014). Caregiver compensation at \$8-\$9 per hour is inadequate to retain skilled caregivers. A working group met briefly with the Texas Health and Human Services department to identify the needs of ventilator-dependent people in the community with little success. Many participants in public engagement commented that there was lack of assistance for transitioning from nursing homes to community-based housing.

6. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.*

Community opposition

Community opposition is a significant barrier to housing access for persons with disabilities, according to representatives of Disability Rights Texas, a nonprofit organization funded by Congress to protect and advocate on behalf of persons with disabilities (Cohen-Miller, 2017).

Intellectual and developmental disabilities

Susan Garnett, CEO of MHMR of Tarrant County and a member of many organization boards and state commissions, described the situation facing families living with members with intellectual and developmental disabilities in Texas (Garnett, 2017). Middle-income and upper-income families are banding together to purchase homes or apartments where their family members can live independently with supports now and after their guardians' death. Lower-income families, especially the great number living in families with multi-generational poverty, have no options. They are living with their children and relatives with IDD and face significant problems in finding and maintaining affordable housing where their family members are

accepted. Many of these lower-income families are dealing with multiple family members with disabilities.

Ms. Garnett gave the example of a mother with a 13-year-old son with IDD. The mother has been evicted from apartments because her son's behaviors make other residents uncomfortable. The reasonable accommodation process was not able to address the situation. Another mother who works as a waitress approached MHMR for services for her 15-year-old son and found a 12-year waiting list to get her son into the HCS program. She is unable to find or afford sitters for her son and has been forced to lock him in her car while she's at work, checking on him frequently, jeopardizing her employment. Children are not generally eligible for after-school services after age 13 in Texas.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

Access to supportive services

Many participants in focus groups for persons with disabilities identified problems with the affordability of quality caregivers and personal care attendants. Parents reported having to leave the workforce to provide care for family members due to the lack of affordable, quality caregivers. Participants reported that low reimbursement rates for caregivers hired through Medicaid programs are a barrier to quality care. Few resources exist to assist families in developing a network of caregivers.

Reimbursement rates are universally low across the U.S., averaging slightly more than minimum wage (LeBlanc, Tonner, & Harrington, 2001). The Texas Home and Community-based Services Workforce Advisory Council found that Texas had among the lowest rates in the nation and that low wages seriously impaired the ability of the state to meet current and future needs for direct-support workers (caregivers) (Texas Department of Aging and Disability Services; Texas Health and Human Services Commission, 2010). The advisory council found that high turnover among direct-support workers was caused by low wages, physically demanding work and the lack of health insurance, resulting in the lack of opportunity to avoid or leave nursing home care. Median annual earnings for personal care workers in Fort Worth is \$14,461 (U.S. Census Bureau 2016). The base wage for community attendants working in the Texas Medicaid system is \$8 per hour and 54% of attendants surveyed used means-tested public assistance (e.g., SNAP) (Ginny McKay Consulting, 2017).

7. Disability and Access Issues Contributing Factors

Lack of accessible **public transportation** was identified as a significant contributing factor to lack of opportunity for persons with disabilities. Participants expressed the need for affordable door-to-door transit as well as fixed-route transit that is accessible and reliable.

Problems with **public infrastructure** were identified that also interacted with access to transit. Participants identified a lack of needed crosswalks, sidewalks with ramps and accessible street crossing signals.

Public facilities were also identified as needing increased accessibility, including city hall, community event centers, libraries and recreation centers.

Most participants spoke positively about access to **education**, but some identified problems, especially with lack of accessible community college programs leading to employment.

Many participants identified the lack of access to supportive **employment** with safe, accessible work-places and supportive services.

Many participants in focus groups and public meetings stated that the **range of housing options for persons with disabilities is extremely limited**, especially for community-based, safe, affordable and publicly supported housing in a variety of floor plans. Persons with intellectual and developmental disabilities, persons who are ventilator dependent and persons with significant mobility impairments find it especially difficult to find adequate, affordable housing that promotes independence. Participants stated that group homes fail to provide adequate levels of service to promote independence and permit some privacy.

Participants in focus groups described **difficulties accessing affordable in-home supportive services that promote independence** in a community-based setting. Many participants commented on the need for housing with in-home resident care attendant services. Many participants discussed the need for “village-style” housing for persons with disabilities. They described a community within a community in which persons with disabilities could live with other persons with disabilities and their families and others where supportive services would be shared and available on-site. Many drew pictures of these communities where personal attendants could be shared; communal facilities for laundry, dining and food preparation and medical assistance would be available; parking would be off-site and golf carts could be used for mobility by those unable to drive. Participants said that these communities are rare. Many participants commented that shared bedrooms in community living is not desirable but is characteristic of many congregate housing situations for persons with disabilities. Several participants offered models of congregate housing that allowed each household to have its own space (“villa”) while sharing and trading supportive services according to needs and abilities. Private communities being built in these models were seen as largely unaffordable to persons with disabilities.

Less often but also mentioned were the following contributing factors to segregation and disproportionate housing needs:

- State or local laws that keep persons with disabilities out of integrated settings
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional to community-based housing
- Lending discrimination

Sample comments from public participation:

- I [ventilator and wheelchair dependent] often receive calls from people who are being released from the hospital with a ventilator and have nowhere to go. A Fort Worth mother called me and said the closest nursing home that would take him [ventilator dependent son] was in San Antonio.
- We have looked online and nothing meets our needs.
- When I [U.S. veteran with service related disability] was homeless, staff at JPS [the county health system] told me to give up my disability checks in exchange for permanent housing in a long-term care facility because I was having so much trouble finding affordable, accessible housing. I would not give up anything [car, independence] to live

in a box with a stranger. I applied to three different housing programs but was told that I make too much money [to qualify]. Housing programs take away all choice.

- Housing where families can stay together is extremely limited.
- Group homes are not adequate. Community activities are few and only include places where everyone would go together.
- Group homes do not provide for separate bedrooms. Room sizes are too small for persons with wheelchairs and other equipment. Residents need their own space.
- It's important to have housing that allows attendants to live with their clients without the attendants' income counting against the person with disability's income and making [the person] ineligible for assistance²¹.

²¹ FWHS policy does not count a required live-in attendant's income for the purpose of determining eligibility or program benefits. Relatives who serve as live-in attendants must meet all the requirements of a non-relative in order for income not to be included when determining eligibility or benefits (Fort Worth Housing Solutions, 2017). Some Texas Medicaid long-term care programs allow for the compensation of live-in family members for certain personal assistance services and under certain programs in recognition that the individual could be working outside the home if not needed to care for a family member (Texas Health and Human Services, 2018; Niesz & Martino, 2003).

E. Fair Housing Enforcement, Outreach Capacity and Resources Analysis

1. *List and Summarize any of the following that have not been resolved*

A charge or letter of finding from HUD concerning a violation of a civil rights-related law.

No charges or findings unresolved at the present time.

A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law.

No cause determination unresolved at the present time.

Any voluntary compliance agreements, conciliation agreements or settlement agreements 40 entered into with HUD or the Department of Justice.

The City of Fort Worth entered into a consent decree with the United States government in response to allegations that the City violated the Fair Housing Act and the Americans with Disabilities Act by refusing to allow the operation of a sober home for persons recovering from drug and alcohol addiction in a single-family residence (2016). The City agreed to rescind all citations and expunge any convictions related to the enforcement of zoning ordinances against the owner of Ebby's Place for "operating a business in a residential neighborhood and any related convictions". The City adopted a Reasonable Accommodation Ordinance in response to the case, clarifying the process for applying for and approving requests for reasonable accommodation (City of Fort Worth, 2016). The city of Fort Worth is required to post the reasonable accommodation ordinance on its website and in offices and may not change its policies and practices during the term of the decree without approval from the U.S. government. The decree required that the City provide a detailed written plan for training staff in the reasonable accommodation process and procedure. It must retain written records of requests for accommodation. It must train professional staff annually in the FHA and ADA, with special emphasis on the ordinance. It must provide any amendments or modifications to residential use zoning districts that affect housing for persons with disabilities to the US government for prior review. It must produce biannual reports on its actions resulting from the decree. The term of the decree is three years. The city of Fort Worth has fully complied with the terms of the consent decree required in the Ebby's Place complaint, including all required training and reporting (Hansen, 2018).

The City of Fort Worth Housing Finance Corporation (FWHFC) entered into a settlement agreement regarding a fair housing allegation involving the Terrell Homes I rental project (City of Fort Worth, 2017). The FWHFC is part of the ownership structure of Terrell Homes but has no role in its day-to-day operations.

A letter of finding issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law.

No findings unresolved at the present time.

A claim under the False Claims Act related to fair housing, nondiscrimination or civil rights generally, including an alleged failure to affirmatively further fair housing.

No claims unresolved at the present time.

Pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

Race Street Lofts with FWHFC as its partner is the subject of a fair housing complaint that is currently under investigation. The complaint was filed with HUD, but HUD deferred to the Texas Workforce Commission. Although the FWHFC is a partner in the project, it has no role in day-to-day operations. However, because FWHFC is an instrumentality of the City, these complaints have been reported to the Department of Justice under the Ebby's Place Consent Decree (City of Fort Worth, 2018).

FWHS responds as required to all complaints.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

Fort Worth City Code; Chapter 17, Human Relations; Article III, Discrimination; Division 4, Fair Housing: The City of Fort Worth Fair Housing ordinance prohibits discrimination on the basis of race, color, religion, national origin, sex (gender), disability, familial status, sexual orientation, transgender, gender identity or gender expression (City of Fort Worth, 2018). The ordinance covers multi-family dwellings with four or more units. Discrimination under the ordinance includes the failure to make units constructed after March 12, 1991 accessible to persons with disabilities, including doorways wide enough for wheelchairs and other requirements of the ADA. Single-family home transactions are exempt if the owner does not own more than three homes at one time and the home was sold without the services of an agent or the sale or rental of rooms in a home with no more than four families if one of the residents is the owner.

The City of Fort Worth enacted an ordinance in 2016 to provide a process to request and approve "reasonable accommodation or modification for residential uses for persons with disabilities" (City of Fort Worth, 2016). The ordinance cites the United States Fair Housing Amendments Act of 1988 and the Americans with Disabilities Act. The ordinance requires that notices be prominently displayed in the City Planning Department advising persons with disabilities of their rights to request reasonable accommodations and the process for doing so. The process stipulates that the department director, the city manager's designee or other City official with the required authority will determine the reasonableness of any request for accommodation. All requests shall receive a written response within 30 calendar days. Decisions may be appealed.

The Texas Fair Housing Act, Property Code, Title 15, Chapter 301 states that persons may not discriminate in the sale, rental, terms or conditions of housing based on race, color, religion, gender, familial status or national origin (State of Texas, 2018). The state code includes a special section titled "disability" that prohibits discrimination on the basis of disability in all aspects of sale, rental, terms and conditions, refusal to permit reasonable modifications and design and construction of multifamily dwellings (after March 13, 1991, with four or more units). The state code includes the city exemptions plus an exemption for housing exclusively for elderly persons.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach and enforcement, including their capacity and the resources available to them.

The agencies listed in Figure 264 provide fair housing outreach, information and enforcement in the region.

Name	Website	Address	Number
City of Dallas Fair Housing Office FHAP (Local)	http://dallascityhall.com/departments/fairhousing/Pages/default.aspx	1500 Marilla Street, Room 1B North Dallas, TX 75201-6318	(214) 670-5677
Fort Worth Human Relations Commission FHAP (Local)	http://fortworthtexas.gov/humanrelations/housing/	1000 Throckmorton Street Fort Worth, TX 76102-6312	(817) 392-7525
Garland Office of Housing and Neighborhood Services FHAP/FHIP (Local)	http://www.garlandtx.gov/gov/hk/housing/fair/default.asp	210 Carver Street, Suite 102A Garland, TX 75040-7386	(972) 205-3316
Fort Worth Regional Office of FHEO (Regional)	https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint	U.S. Department of Housing and Urban Development 801 Cherry Street, Unit #45, Suite 2500 Fort Worth, Texas 76102	(817) 978-5900 (800) 669-9777 TTY (817) 978-5595
Tarrant County Housing Assistance Office FHAP (Local/County)	http://access.tarrantcounty.com/en/housing-assistance-office/about-us/fair-housing.html	2100 Circle Drive Fort Worth, Texas 76119	817-884-1111
North Texas Fair Housing Center	http://www.northtexasfairhousing.org/	8625 King George Drive, Ste. 130 Dallas, TX 75235	(469) 941-0375

Figure 264: Fair housing agencies of north Texas

The **HUD Fair Housing and Equal Opportunity (FHEO)** office in Fort Worth receives complaints from throughout the region. The mission of the FHEO is to “eliminate housing discrimination, promote economic opportunity and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development and public understanding of federal fair housing policies and laws. FHEO protects people from discrimination on the basis of race, color, religion, sex, national origin, disability and familial status” (U.S. Department of Housing and Urban Development, 2018). HUD maintains a list of cases filed by type and name of alleged party in violation. Complaints can be filed online, by mail or phone, including accommodations for persons with disabilities. Investigations are completed within 100 days of receipt of complaint or the complainant is notified. HUD may refer complaints to local offices that have been approved to handle housing discrimination investigations. The local office must begin work within 30 days

of the assignment or HUD reassumes responsibility for the complaint. The HUD website offers possible immediate assistance with judicial relief if a situation of irreparable harm is imminent or a clear violation exists. Services are offered at no cost. Complaints resulting in a finding of discrimination must be heard by a court within 120 days of the finding. The national FHEO organization consists of 24 offices, including programs, investigations, enforcement, administration, planning and budget, information services and communications, field oversight and legislative initiatives and outreach. The Fort Worth office (Region VI) is staffed by two directors and one additional contact person (U.S. Department of Housing and Urban Development, 2018).

The **Human Relations Unit (HRU) of the City of Fort Worth** has the authority as a Fair Housing Assistance Program funded by the federal government to receive complaints and investigate and enforce violations of city and federal fair housing laws (City of Fort Worth, 2018). The HRU also provides fair housing information, outreach, conciliation services and supports the work of the Fort Worth Human Relations Commission (monthly meetings). The HRU also supports the Mayor's Committee on Persons with Disabilities (monthly), provides training for ADA coordinators and City department liaisons, hosts ADA/FHA training for City employees, hosts a public film series addressing matters important to protected classes, participates in a City diversity and inclusion committee and supports special events and projects around special populations (Fort Worth Human Relations Commission, 2017).

The **Texas Workforce Commission (TWC)** accepts complaints of housing discrimination for locations other than Dallas, Fort Worth and Garland where fair housing offices are located and for complaints that have not previously been submitted to HUD (Texas Workforce Commission, 2018). TWC maintains a website with information on fair housing rights, including accessibility requirements for buildings, rights of persons with disabilities and familial status, mortgage lending and sales or rental housing. Complaints may be filed via the website online form, email, U.S. mail or fax. TWC attempts to contact the alleged discriminating party requesting a response. An optional mediation process is offered to all parties. If conciliation and mediation are not possible, TWC conducts an investigation. A Charge of Discrimination is issued if a violation is found. The Texas Attorney General's Office files lawsuits against discriminating parties. TWC maintains a Civil Rights Division to enforce the Texas Commission on Human Rights Act and the Texas Fair Housing Act. The Texas Fair Housing Act requires that TWC produce an annual report on housing discrimination (State of Texas, 2018). TWC offers training and presentations to its partners on fair housing, including a fair housing self-help library, at little or low cost (Texas Workforce Commission, 2018).

The **City of Dallas Fair Housing Office (FHO)** is a participant in HUD's Fair Housing Assistance Program and is funded to enforce local fair housing laws that are substantially equivalent to the Federal Housing Act (U.S. Department of Housing and Urban Development, 2018). The Dallas FHO receives housing discrimination complaints, investigates complaints, conducts conciliation and mediation, offers fair housing training, approves and monitors Affirmative Fair Housing Marketing Plans, maintains a list of publicly assisted affordable housing, produces a Housing and Disability Resource Guide and monitors ADA compliance for Dallas and the region (City of Dallas, 2018). Training and complaint procedures can be accessed through the website. Training is offered on a customized basis, including speaking at events such as the MetroTex Leadership Academy for real estate agents (MetroTex, 2018). Training and presentations are offered free of charge.

The **North Texas Fair Housing Center (NTFHC)** is a participant in HUD's Fair Housing Initiatives Program and receives federal funding to provide free fair housing services (U.S Department of Housing and Urban Development, 2018). NTFHC provides housing problem counseling, complaint investigation and training to residents of 12 North Texas counties (North Texas Fair Housing Center, 2018). Training is available for landlords, property managers, real estate agents, tenants, prospective homebuyers, city governments and nonprofit organizations on fair housing topics at no charge. NTFHC partnered with other fair housing organizations to successfully pursue a judgment against Wells Fargo Bank for allegedly providing poorer care for real estate-owned foreclosed properties in non-white communities than in white communities. Proceeds from the successful action are being used to fund NTFHC grants to nonprofit agencies for housing rehabilitation, housing retention in owner occupied homes, neighborhood revitalization, accessibility modifications and down payment assistance for persons earning up to 120% of area median income. NTFHC also conducts paired testing to assess the level of unfair housing discrimination. The agency has produced one report of its testing since it was formed in 2010. The paired testing study found that 37% of rental attempts by black testers (N=27), 33% of Hispanic attempts and 20% of attempts by families with children (N=10) were met with illegal housing discrimination (North Texas Fair Housing Center, 2011). Violations included differences in rental prices offered, information regarding availability of units, security deposit amounts, move-in specials, treatment, access to rental applications and steering buyers to certain properties and areas.

4. Additional Information

a.

Provide additional relevant information, if any, about fair housing enforcement, outreach capacity and resources in the jurisdiction and region.

The City of Fort Worth HRU increased its responsibilities significantly in 2017, adding the Mayor's Committee on Persons with Disabilities, the Diversity Advisory Committee and an ADA coordinator with responsibilities to update the CFW ADA Transition Plan and monitor compliance with the Ebby's Place Consent Decree, including training and bi-annual reporting. FWHRC expressed concern that an HRU staffing shortage and additional duties negatively affected the organization's ability to expand outreach and education activities (Fort Worth Human Relations Commission, 2017).

b.

The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The Texas Attorney General's Office maintains a website on tenant rights (Paxton, 2018). The website provides guidance for consumers under its Consumer Protection Division and receives complaints, which may be referred to other agencies or reviewed by a compliance specialist for possible litigation. The Compliance Division will file suit on behalf of the complainant for substantiated complaints that are in the public interest.

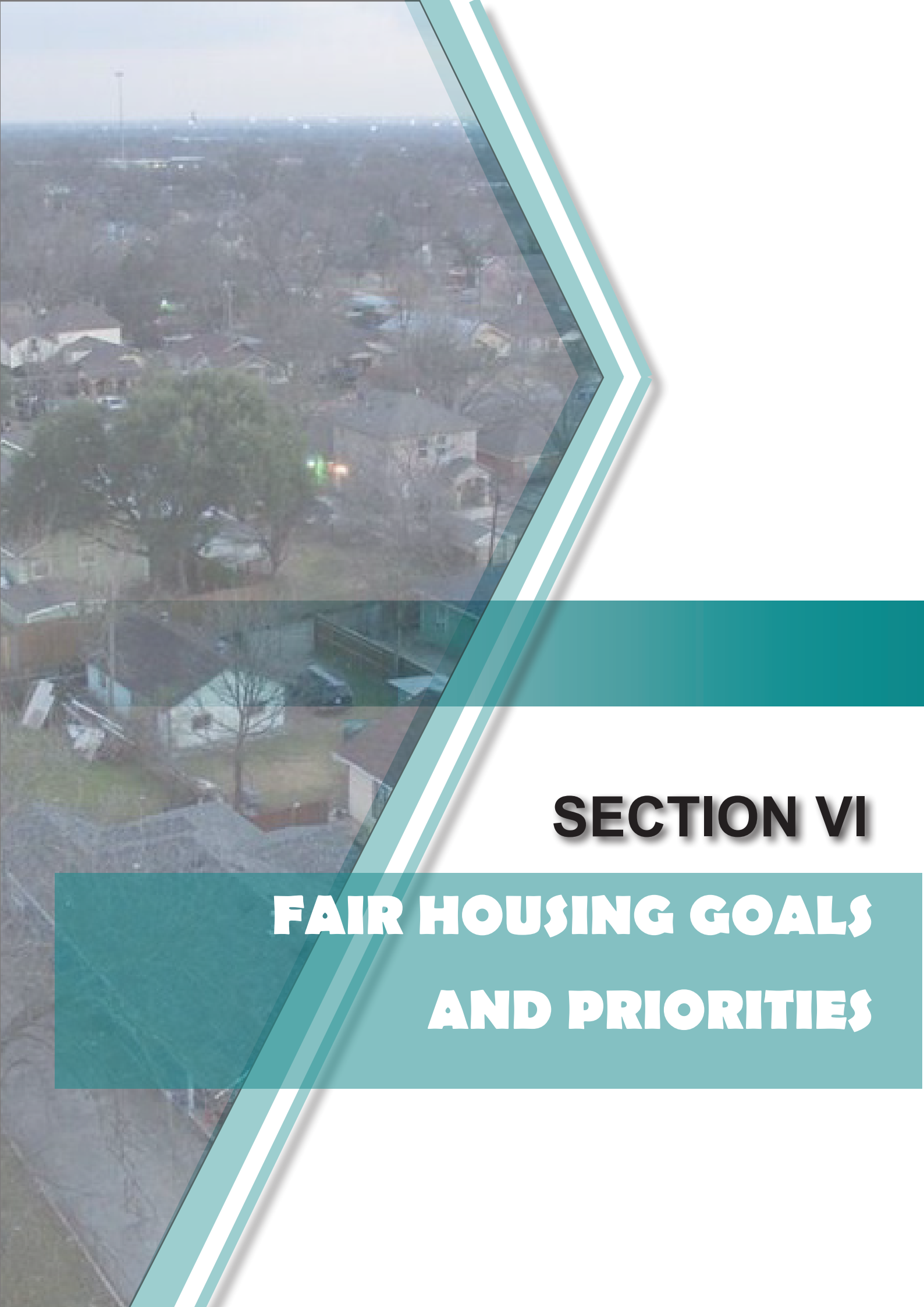
Fort Worth collaborates with FWHS to identify fair housing issues and strategies (City of Fort Worth: Neighborhood Services, 2017). "Know Your Fair Housing Rights" training was presented in October 2016 (City of Fort Worth, 2018). The training was attended by 25 residents as well as community leaders and property managers. The City partnered with FWHS, the Greater Fort

Worth Association of Realtors and the Apartment Association of Tarrant County to conduct "How to be a Better Landlord" training for 100 property managers, landlords and owners. Training was conducted by the City's Human Relations Unit with panelists from Fort Worth Community Action Partners, Fort Worth Code Compliance, FWHS and the Texas Workforce Commission.

5. Fair Housing Enforcement, Outreach Capacity and Resources Contributing Factors

One hundred fifty-six comments and votes were made regarding fair housing enforcement. Public participants identified the following contributing factors in order of importance:

- Lack of resources for housing enforcement agencies (38)
- Lack of local housing enforcement and education among private entities (36)
- Lack of state or local fair housing laws (29)
- Failure to resolve violations (27)
- Lack of local fair housing enforcement by agencies and government (26)



SECTION VI

FAIR HOUSING GOALS AND PRIORITIES

VI. Fair Housing Goals and Priorities

1

For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Information gathered from public meetings, focus groups and stakeholder interviews was obtained and analyzed in a variety of ways to ascertain the overall importance of contributing factors to fair housing issues within each issue area and across issue areas. All comments were considered, but priority was placed on factors and issue areas that received repeated comments and were substantiated by local research and quantitative and GIS analysis. Related contributing factors were grouped to identify overall trends.

Public meetings in 2017 included an exercise that asked participants to vote for the top three contributing factors in each of four selected fair housing issue areas, following presentation and discussion of HUD data. Figure 265 displays the total number of votes collected within each issue area, a gross indicator of interest or concern about each area.

Issue Area	Total Votes
Housing Problems	255
Disabilities	240
Access to Opportunity	236
R/ECAPs	232
Publicly Supported Housing	214
Fair Housing	206

Figure 265: Votes received by issue area in public meetings, FWHS 2017

Figure 266 displays the votes from public meetings for top contributing factors to housing problems. The most votes went to problems with older homes needing expensive repairs and to rapidly rising rents.

Contributing Factors-Housing Problems	Total Votes
Older homes need expensive repairs	50
Rapidly rising rents	42
Lack of money for down payment	37
Increasing property taxes	37
Lack of police protection or visibility in the neighborhood	32
Landlords failing to maintain property	25
Difficulty obtaining a mortgage loan	20
Sellers won't make needed repairs for buyers	12

Figure 266: Contributing factors to housing problems with number of votes in public meetings, FWHS 2017

Figure 267 displays the number of votes received during public meetings for contributing factors to barriers to fair housing for persons with disabilities. The most votes went to lack of affordable in-home or community-based supportive services.

Contributing Factors-Persons with Disabilities	Total Votes
Lack of affordable in-home or community-based supportive services	35
Lack of affordable, accessible housing in a range of unit sizes	30
Lack of assistance for housing accessibility modifications	29
Inaccessible public or private infrastructure	28
Lack of accessible transportation	28
Lack of accessible, proficient schools	23
Lack of assistance for transitioning from institutional settings to integrated housing	22
Lack of accessible publicly supported housing	17
Lending discrimination	13
State or local laws, policies or practices that discourage individuals with disabilities from living in integrated settings	11
Inaccessible government facilities or services	4

Figure 267: Contributing factors to fair housing access for persons with disabilities, (NTRHA 2017)

Figure 268 displays the voting for contributing factors to barriers to access to opportunity. The most votes went to lack of public or private investment in specific neighborhoods and the location and type of affordable housing.

Contributing Factors-Access to Opportunity	Total
Lack of investment in specific neighborhoods	39
Location and type affordable housing	36
Availability of affordable units in a range of sizes	33
Location of proficient schools and school assignment policies	22
Availability, type, frequency and reliability of public transportation	19
Source of income discrimination (landlords refuse to accept Vouchers)	18
Location of employers	16
Impediments to mobility (moving to higher opportunity areas)	15
Access to financial services or lending discrimination	13
Land use and zoning laws	8
Private discrimination	8
Occupancy codes and restrictions	5
Location of environmental health hazards	4

Figure 268: Contributing factors to access to opportunity with number of votes, FWHS 2017

Figure 269 displays the voting for contributing factors to the creation or severity of racially and ethnically concentrated areas of poverty. The most votes went to the location and type of affordable housing.

Contributing Factor-R/ECAPs	Total Votes
Location and type of affordable housing	47
Lack of investment in specific neighborhoods	37
Lack of community revitalization strategies	37
Community opposition	32
Deteriorated and abandoned properties	30
Loss of affordable housing	21
Source of income discrimination	19
Private discrimination	9

Figure 269: Contributing factors to R/ECAPs with number of votes, FWHS 2017

Figure 270 displays the voting results from public meetings for contributing factors to barriers to access to publicly supported housing. The most votes went to lack of public and private investment in specific neighborhoods.

Contributing Factors-Publicly Supported Housing	Total Votes
Lack of investment in specific neighborhoods (public or private) in affordable housing or amenities and services	39
Policies, practices or community opposition that limit location of publicly supported housing, including tax credit projects	36
Loss of affordable housing and increasing rents	33
Lack of access to publicly supported housing in high-opportunity areas	28
Lack of information about publicly supported housing programs	26
Source of income discrimination	21
Lack of housing support for victims of domestic violence, dating violence, sexual assault and stalking	13
Admissions and occupancy policies and procedures	9
Language barriers in serving tenants with LEP	9

Figure 270: Contributing factors to barriers to access to publicly supported housing, FWHS 2017

Figure 271 displays the voting results for contributing factors to barriers to fair housing enforcement, outreach and education. The most votes went to lack of resources for fair housing agencies and organizations.

Contributing Factors-Fair Housing Enforcement	Total Votes
Resources (staff, budget, etc) for fair housing enforcement agencies and organizations	52
Local education and fair housing enforcement by private housing providers (real estate agents, builders)	49
Resolution of violations of fair housing or civil rights law	38
State or local fair housing laws	35
Local fair housing enforcement by agencies and government	32

Figure 271: Contributing factors to fair housing enforcement, outreach and education, FWHS 2017

Votes were also analyzed across issue areas and grouped where they were related to identify over-arching factors. Figure 272 displays votes for contributing factors sorted by common themes across issue areas. The most votes were received by contributing factors related to affordability of housing (383 votes). These factors (shown in green) were seen as contributing to R/ECAPs, housing problems, access to opportunity, barriers to housing for persons with disabilities and for access to publicly supported housing. Factors shaded in yellow relate to lack of investments in specific communities. Factors shaded in blue relate to community opposition and discrimination. Factors shaded in rose relate to transportation.

Contributing Factors	Issue Area	Votes
Location and type of affordable housing	R/ECAPs	47
Rapidly rising rents	Housing Problems	42
Lack of money for down payment	Housing Problems	37
Increasing property taxes	Housing Problems	37
Location and type affordable housing	Access to Opportunity	36
Lack of affordable in-home or community-based supportive services	Disabilities	35
Loss of affordable housing and increasing rents	Publicly Supported Housing	33
Availability of affordable units in a range of sizes	Access to Opportunity	33
Lack of affordable, accessible housing in a range of unit sizes	Disabilities	30
Loss of affordable housing	R/ECAPs	21
Difficulty obtaining a mortgage loan	Housing Problems	20
Sellers won't make needed repairs for buyers	Housing Problems	12
Older homes need expensive repairs	Housing Problems	50
Lack of investment in specific neighborhoods	Access to Opportunity	39
Lack of investment in specific neighborhoods (public or private)	Publicly Supported Housing	39
Lack of community revitalization strategies	R/ECAPs	37
Lack of investment in specific neighborhoods	R/ECAPs	37
Lack of police protection or visibility in the neighborhood	Housing Problems	32
Deteriorated and abandoned properties	R/ECAPs	30
Inaccessible public or private infrastructure	Disabilities	28
Landlords failing to maintain property	Housing Problems	25
Inaccessible government facilities or services	Disabilities	4
Policies, practices or community opposition that limit location of publicly supported housing.	Publicly Supported Housing	36
Community opposition	R/ECAPs	32
Source of income discrimination	Publicly Supported Housing	21
Source of income discrimination	R/ECAPs	19
Source of income discrimination (landlords refuse to accept Vouchers)	Access to Opportunity	18
Access to financial services or lending discrimination	Access to Opportunity	13
Lending discrimination	Disabilities	13
Policies or practices that discourage individuals with disabilities from living in integrated settings	Disabilities	11
Private discrimination	R/ECAPs	9
Private discrimination	Access to Opportunity	8
Lack of accessible transportation	Disabilities	28
Availability, type, frequency and reliability of public transportation	Access to Opportunity	19

Figure 272: Top categories of contributing factors across issue areas by votes

Comments received from public meetings, focus groups, stakeholder or subject matter expert interviews and consultations were coded and summarized using qualitative analysis software and grouped by fair housing issue area and contributing factor. Figure 273 organizes and summarizes all public input by related groups of contributing factors for each issue area (vertical). Groups of contributing factors are listed in order of their relative frequency in comments and votes within each issue area, with the most frequently identified contributing factors at the top of each column. Similar colors identify related contributing factors that cross and repeat among issue areas.

Contributing Factors of Disparities in Access To Opportunity	Contributing Factors of Disproportionate Housing Needs	Contributing Factors of Publicly Supported Housing Location and Occupancy	Contributing Factors of R/ECAPs	Contributing Factors of Segregation	Disability and Access Issues Contributing Factors	Fair Housing Enforcement
Affordable housing: Location and type of affordable housing, lack of access to opportunity due to high housing costs, loss of affordable housing (60 comments)	Affordable housing: Availability of affordable units in range of sizes, Loss of affordable housing (property taxes, rising prices), Lack of access to opportunity due to high housing costs (down payment assist, displacement of residents, (193 comments, including CFW survey)	Community opposition: Source of income discrimination, lack of access to housing in high-opportunity areas, siting criteria for affordable housing, (94 comments public meetings, 258 comments from CFW survey)	Lack of public and private investments in specific neighborhoods: lack of community revitalization strategies, deteriorated and abandoned properties (135 comments)	Lack of revitalization: Deteriorated and abandoned properties (836 CFW survey respondents, including 72% of black survey respondents)	Lack of affordable, integrated housing for individuals who need supportive services in range of sizes, lack of in-home services (151 comments)	Resources (staff, budget, etc.) for fair housing enforcement agencies and organizations (65 comments)
Availability, type, frequency and reliability of public transportation (55 comments)	Housing Problems: poor maintenance, old housing stock (127 comments, including CFW survey)	Lack of access to opportunity due to high housing costs, Loss of affordable housing (42 comments)	Location and type of affordable housing, Loss of affordable housing (72 comments)	Economic pressures: rising rents, housing prices, loss of affordable housing, availability of affordable housing (774 responses CFW Survey)	Access to transportation for persons with disabilities (73 comments)	Local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.) (38 comments)
Lack of investments in specific neighborhoods, both public and private (44 comments)	Lack of public investment in specific neighborhoods, rising crime, crime associated with affordable housing (54 comments, including CFW survey)	Quality of affordable housing information programs (37 comments)	Community opposition (40% of CFW survey comments), source of income discrimination, private discrimination (60 public participation comments)	Private discrimination (55% of black CFW survey respondents); community support (72% of black CFW survey respondents)	Inaccessible public or private infrastructure (59 comments)	Resolution of violations of fair housing or civil rights law (26 comments)
Source of income discrimination, access to financial services or lending discrimination, private discrimination (32 comments)		Lack of investment in specific neighborhoods, both public and private (28 comments)			Access to publicly supported housing for persons with disabilities (38 comments)	Local fair housing enforcement by agencies and government (24 comments)

Figure 273: Summary of public participation comments, votes and CFW survey responses by AFH issue area and contributing factors

Figure 274 displays a summary of the highest priority contributing factors to fair housing issues, based on community input. This chart was presented to the community for additional feedback during a second round of public meetings and stakeholder engagement. At least one highly ranked contributing factor was selected in each fair housing issue area. Highest priority issues are listed first.

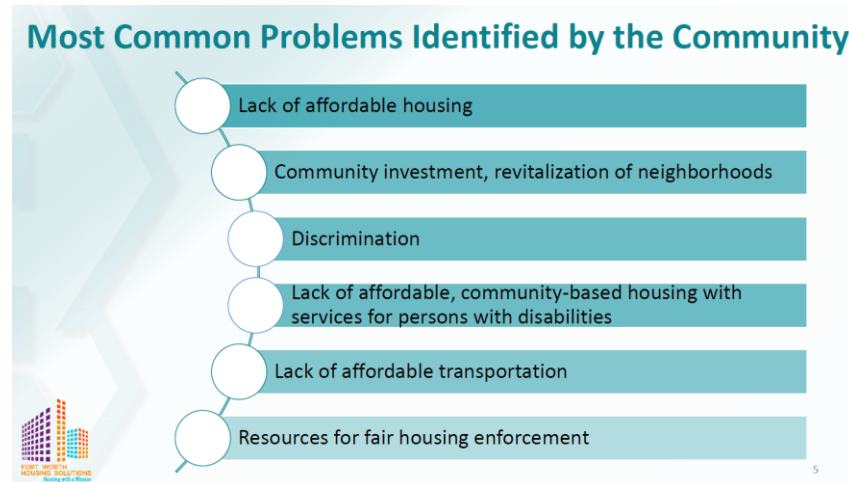


Figure 274: Summary of contributing factors most commonly identified in public engagement, FWHS 2017

An additional issue was identified, based on public input and subject matter expert consultation, that bridges several of the elements of access to opportunity. Figure 275 symbolizes the geographic mismatch between jobs at lower wage levels and housing that would be affordable to those job-holders. Many support and service job-holders and middle-income professionals work in higher income communities where there is no housing affordable to them, requiring them to travel significant distances for employment. The lack of affordable, reliable and responsive transportation options, connecting housing and employment, significantly increases housing cost and affects quality of life.



Figure 275: Location of affordable housing in relation to jobs and connecting transit

Goals were developed to address each top priority issue. Participants in round two of public meetings were asked to rate each goal to indicate its importance to resolving fair housing issues.

Participation in these meetings was very low, partly due to inclement weather, but no participants rated any goal of low importance or not important. Materials used in presenting draft goals and strategies to the community are included in the Appendix.



Figure 276: FWHS AFFH goals presented to community for comment

Participants in public meetings shared the following reactions to the draft goals and strategies:

- Mobility counseling is a good idea and will help overcome tenant pre-conceived objections to moving to higher opportunity areas.
- Mixed-income developments are an important goal.
- Assisting with property repairs, including multifamily properties, is important and will help improve community attitudes about lower income communities.
- Increase the variety of housing types to include modern multi-use and manor house designs.
- Public transportation is really helpful for residents of affordable housing, but is not adequate to help people get to where good jobs are located and get their children to and from child care. Some people in publicly assisted housing could eliminate their need for assistance if there was better transit access to good jobs and child care. This could free-up vouchers for needier people.
- Expand opportunities for small developers from minority communities, including a small contractor initiative and researching racial disparities in financing of multifamily projects.
- Explore land banking in Stop Six neighborhood.
- Sponsor annual community events around fair housing.
- Encourage youth tenant associations that foster civic engagement and voting.
- Expand financial education in school districts to include housing, financial literacy and wealth development.
- Encourage community-based public private partnerships to increase affordable housing development.
- Create incentives to increase the amount of ADA-compliant units in new residential developments.

Draft goals and strategies were distributed to the NTRHA Technical Advisory committee. Advisors made the following comments in a meeting held in June 2018:

- Goals and strategies must be accompanied by more detailed metrics, milestones and identification of the parties to be involved in implementation.
- Goal implementation should incorporate community partners.
- AFH goals should strive to set policy that makes affordable housing development on vacant land cheaper and easier to do.

- Need a strategy to deal with cities in the region that don't have the political will to increase affordable housing.
- Smaller housing authorities should consider collaboration or consolidation to address problems with lack of capacity. Use regional approaches to address lack of capacity.
- Make goals around access to fair housing information consistent across all jurisdictions in the NTRHA. This should include tenant rights education (e.g. rights to repairs). Research and use best practices for information dissemination, including working through nonprofit partners (tenant rights organizations), making information mobile and taking it to the apartments where the problems are greatest.
- Develop goals and strategies that promote equitable development.
- Mount an outreach program to voucher holders (through nonprofit partners) to make them aware that they can use the SAFMR program to move to better areas. Watch for new mobility funding possible from Congress to fund programs.
- Include in the AFH report a discussion of the capacity required by cities and housing authorities to continuously track progress toward metrics. Be detailed about what is needed.

2

For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved and indicate the timeframe for achievement.

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones and Timeframe for Achievement</u>	<u>Responsible</u>
Increase access to affordable housing in high-opportunity areas	Location and type of affordable housing, lack of access to opportunity due to high housing costs, loss of affordable housing, source of income discrimination, availability of affordable units in range of sizes	Segregation, R/ECAPs, disproportionate housing needs, disparities in access to opportunity, publicly supported housing	<ul style="list-style-type: none"> Continue and expand coordination of the Housing Choice Voucher program among partnering public housing authorities to encourage use of vouchers in high-opportunity areas, de-concentrate poverty, find operating efficiencies and solve problems at common properties. Include joint funding of mobility counseling and housing retention support for voucher holders before, during and after moving. Exploit opportunities in the Rental Assistance Demonstration program to provide greater access to housing in high-opportunity areas. Locate new development projects in high-opportunity areas. Help relocating residents use the Choice Mobility option to move to higher opportunity areas. Implement Small Area Fair Market Rent program to increase rental assistance available in higher opportunity areas. Support regional Fair Market Rent analysis to enhance voucher competitiveness. Expand outreach programs and provide financial/programmatic incentives to attract landlords in high-opportunity areas. Seek funding for incentives based on successful regional, state and national best practices (e.g. risk pools, paid deposits and application fees, double deposits, single point of contact for problem resolution). Ensure that internal policies and practices advance access and mobility for groups with significant challenges in accessing safe and affordable housing, including people with disabilities, limited English proficiency and histories of evictions. Partner with social service providers and special programs to support housing re-entry programs for persons with criminal backgrounds. Recruit and support landlords to expand "second chance" opportunities for people with evictions. Develop strategies for using PBVs, as funding becomes available, to increase access to publicly supported affordable housing in high-opportunity areas 	FWHS Partners to engage: Tarrant County Housing, Arlington Housing Authority, City of Fort Worth, nonprofit agencies
Discussion: Increasing access to higher opportunity areas de-concentrates poverty and associated segregation. Source of income discrimination prevents access to higher opportunity areas. Landlord incentive and recruitment programs have been shown to increase landlord participation in voucher programs in higher opportunity areas.				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones and Timeframe for Achievement</u>	<u>Responsible</u>
Increase supply of affordable housing units, especially in higher opportunity areas	Location and type of affordable housing, community opposition, housing problems	Disproportionate housing needs, segregation, R/ECAPs	<ul style="list-style-type: none"> • Seek funding to expand nationally recognized Family Self Sufficiency program to increase opportunities for homeownership using the Housing Choice Voucher program. • Collaborate with the City of Fort Worth and other partners to develop a strategic plan to meet the community's needs for affordable housing. • Continue the development of mixed-income housing that preserves and increases the quantity of high-quality affordable housing. • Partner with the City to develop and implement strategies to address community opposition and barriers to site selection for affordable housing. • Partner with City to develop Residential Property Improvement Repair Programs targeted to maintain current affordable housing and attract potential landlords for publicly supported housing. • Advocate for the transportation needs of residents in publicly supported housing with city and regional stakeholders. Collaborate in efforts to improve public transportation service (stops, frequency, schedule) and develop innovative public-private partnerships to connect residents to job and educational opportunities. 	FWHS Partners to engage: City of Fort Worth, Trinity Metro, business organizations
<p>Discussion: Increasing the supply of affordable housing will address the needs of protected classes whose housing choice is limited by low income and high market prices. Supply can be increased by using public assistance to give voucher holders access to homeownership. It may be possible to craft incentive programs for landlords who might be attracted to participate in voucher programs if they can be assisted with major property maintenance. Improved property conditions can decrease community opposition. Addressing community opposition is critical to successful development in higher opportunity areas. Mixed-income housing directly addresses segregation that coincides with low-income communities. Transportation is critical to making assisted housing in higher opportunity areas successful and to address disproportionate housing needs.</p>				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones and Timeframe for Achievement</u>	<u>Responsible</u>
Increase supply of accessible, affordable housing for persons with disabilities	Lack of affordable integrated housing for persons needing supportive services; lack of affordable, accessible housing for persons with disabilities; lack of affordable in-home or community-based supportive services; state or local laws, policies or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings.	Disabilities and accessibility	Use the Rental Assistance Demonstration and Project-Based Voucher programs to increase the availability of affordable, accessible housing for person with disabilities in higher opportunity areas.	FWHS
Discussion: Special voucher programs can be targeted to provide accessible housing opportunities for persons with disabilities that work together with state Medicaid long term care programs.				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones and Timeframe for Achievement</u>	<u>Responsible</u>
Increase access to information and resources on fair and affordable housing	Lack of access to assistance for housing modifications, lack of access to supportive services, lack of resources for housing enforcement agencies	Disproportionate housing needs, disparities in access to opportunity, segregation	<ul style="list-style-type: none"> In partnership with fair housing agencies, expand efforts to provide affordable housing information to persons seeking publicly assisted housing and to residents of publicly assisted housing. Conduct targeted outreach to persons with disabilities and seniors to include connection to resources for assistance with guardianship, access to state and local programs for supportive services and assistance with housing modifications in both private homes and rented housing. 	FWHS Partners to engage: Fair housing organizations, nonprofit agencies
Discussion: Participants in public engagement say that people don't know about the resources that are available help them with housing needs and problems. Partnering with nonprofit agencies can expand resources available to conduct education and outreach.				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones and Timeframe for Achievement</u>	<u>Responsible</u>
Maintain and improve the quality, management and community impact of publicly supported housing	Poor condition of housing stock, Crime, Source of income discrimination, Community opposition, Lack of investment in neighborhoods	Disproportionate housing needs, disparities in access to opportunity	<ul style="list-style-type: none"> Expand processes for monitoring property management and maintenance where publicly-supported housing is located, including its impact on the community, including: <ul style="list-style-type: none"> Coordination with schools Monitoring crime (at property and neighborhood levels) Regular attendance at stakeholder meetings (e.g. neighborhood associations) Periodic community stakeholder surveys Regular visual observation of the exterior of properties Maintain and expand processes for responding to issues identified via monitoring with: <ul style="list-style-type: none"> Problem-solving sessions with school staff, police departments and property managers Communications to and problem-solving sessions with publicly-assisted tenants Communications with property managers to report concerns Coordination with city housing department staff to identify resources for property managers struggling to maintain older properties. Expand efforts toward coordination among public housing authorities with residents at common properties, including inspections, monitoring and problem solving. Continue to contribute to community revitalization through redevelopment of properties in targeted areas (e.g. RAD in southeast Fort Worth) and partnership in community revitalization efforts (e.g. Las Vegas Trail) where publicly supported housing is located. 	
<p>Discussion: Local research demonstrates that the condition of publicly assisted and low-income housing is a significant driver of community attitudes. Well-managed and well-maintained properties improve public opinion and may reduce some community opposition. The quality of FWHS properties is a catalyst to improving the quality of development in distressed neighborhoods.</p>				

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APPENDICES

Appendices

Methodology for Segregation Analysis

To assess levels and patterns of segregation, HUD has provided program participants with a 'Dissimilarity Index' which measures the relative degree of segregation between two groups. The higher the value, the higher the degree of dissimilarity. To supplement the HUD dissimilarity index and assess spatial patterns of segregation, our team of researchers has developed the following methodological protocol.

Using the dissimilarity value as a starting point, the intent is to measure to what extent the racial composition of a given census tract significantly differs from the overall jurisdictional racial composition. In other words, the objective is to assess whether there is a statistically significant difference between the racial makeup of a census tract (conventional equivalent of a neighborhood) and the overall city. To do so, we performed a series of "t-test" for Non-white groups/white, black/white, Hispanic/white and Asian or Pacific Islander/white – in accordance with the available HUD dissimilarity indices. The values obtained from this type analysis allow determining whether a statistical difference exist.

Below is a brief overview of the analytical steps taken to assess spatial patterns of segregation.

A. T-TEST

In order to compare the jurisdictional racial/ethnic composition with that in each census tract, we decided to use t-test.

\hat{p} = percentage of selected racial/ethnic group in census tract (i.e. 'Non-white')

Test statistic:

$$Z = \frac{\hat{p} - p_0}{\sqrt{\frac{p_0(1-p_0)}{n}}}$$

p_0 = percentage of selected racial/ ethnic group in jurisdiction (i.e. 'Non-white')

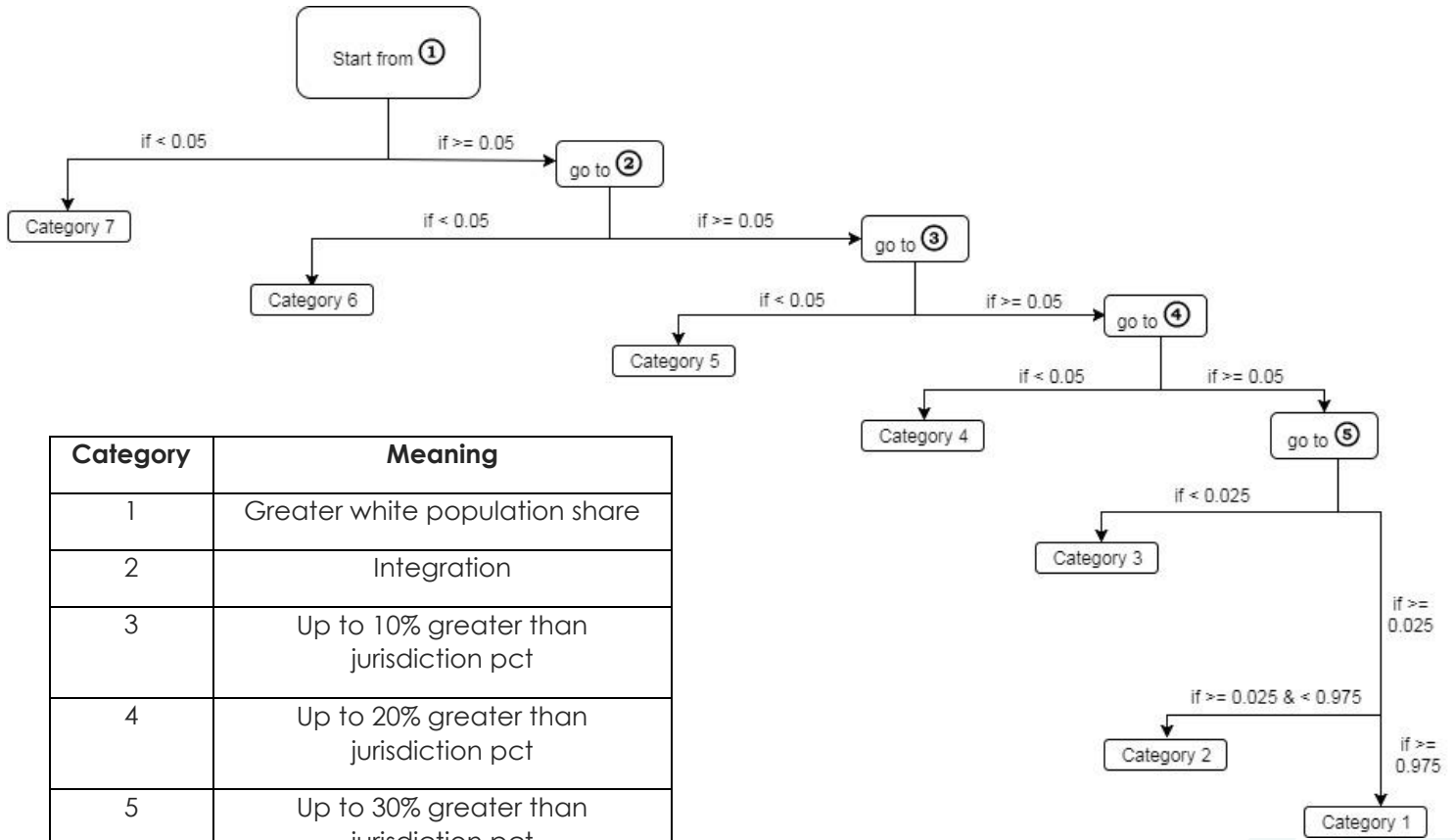
n = total population in one census tract

For each census tract, we obtain a Z value for which there is a corresponding 'p-value' that allows us to determine whether we accept or reject the hypothesis that the racial composition of the census tract is statistically different from the city. Put simply, if the p-value is smaller than 0.05 (one tail) or 0.025 (two-tail test), then there is a statistical difference between the census tract and the city (at a 95% of confidence).

B. METHODOLOGICAL APPROACH

In order to assess the magnitude of the difference between the census tract and the city, we sequentially performed multiple t-tests for several percentage difference brackets; namely: 10,20,30,40 and more than 40% difference. Similarly, for each z-value and associated p-value, we determined whether there is a significant difference for the set range (either >40% difference, <40%, <30%, <20% and <10%). Within a 1% difference range, the census tract is qualified as "integrated" with respect to overall jurisdictional composition.

The flow chart below shows how we decide which category a census tract belongs to:



Category	Meaning
1	Greater white population share
2	Integration
3	Up to 10% greater than jurisdiction pct
4	Up to 20% greater than jurisdiction pct
5	Up to 30% greater than jurisdiction pct
6	Up to 40% greater than jurisdiction pct
7	More than 40% greater than jurisdiction pct

<div><div>①</div><div>②</div><div>③</div><div>④</div><div>⑤</div></div>											
geoid	>40% z-score	p-value	>30% z-score	p-value	>20% z-score	p-value	>10% z-score	p-value	z-score	p-value	Category
48113014132	-43.9300	1	-34.15	1	-24.37	1	-14.6	1	-4.805	1	1
48113018505	-18.8854	1	-7.02	1	-4.839	0	16.7	0	-28.56	0	5
48113013625	-21.3627	1	-10.60	1	-0.158	0.437	10.9	0	21.68	0	4
48113010704	-16.3246	1	-0.923	0.822	14.48	0	29.9	0	45.28	0	5
48113010801	-24.3470	1	-4.024	1	16.30	0	36.6	0	56.94	0	5

Public Notices: English and Spanish, First Round Public Meetings FWHS/CFW



City of Fort Worth and Fort Worth Housing Solutions Notice of Public Meetings Assessment of Fair Housing



The City of Fort Worth and Fort Worth Housing Solutions will hold public meetings beginning July 12, 2017 through August 29, 2017. These meetings are intended to inform residents about the Assessment of Fair Housing (AFH) and provide an opportunity for all to participate in the AFH planning process.

The Assessment of Fair Housing is a legal requirement that the City of Fort Worth and Fort Worth Housing Solutions must complete in order to continue receiving federal funding from the United States Department of Housing & Urban Development (HUD). AFH plans are being prepared in order to affirmatively further fair housing and proactively address fair housing issues, especially with the use of federal funds. The AFH analysis covers a broad spectrum of issues that affect fair housing choice, including the following: regional demographics, racial and ethnic concentrations, racially and ethnically concentrated areas of poverty, access to opportunity, disproportionate housing need, publicly supported housing, housing and service accessibility issues for persons with disabilities, and local fair housing enforcement and outreach activities. The AFH will also address affordable housing issues, and identify fair housing priorities and goals specific to Fort Worth. The AFH is being carried out pursuant to 24 CFR Part 5.150-5.168 as well as applicable sections of 24 CFR Part 91 and 24 CFR 903 in the federal regulations.

Residents, businesses, nonprofit organizations, churches, schools, and other interested parties in Fort Worth and surrounding communities are encouraged to attend and provide input. Meetings have been scheduled in every City Council district. Additionally, city-wide meetings have been scheduled at Fort Worth Housing Solutions. Interested persons may attend any meeting of their choice, regardless of the location of the meeting. Interested persons who are unable to attend, or who wish to provide additional input, may also contribute their ideas and participate in the AFH process by taking an online survey at <http://fortworthtexas.gov/news/2017/05/Fair-Housing-Assessment/>.

Questions about the AFH process or meetings may be addressed to Eric Vodicka at 817-392-7583 or eric.vodicka@fortworthtexas.gov; or Bria Francisco at 817.333.2145 or bfrancisco@fwhs.org.

Persons with disabilities who may need accommodation, auxiliary aids, or services such as interpreters are requested to contact the City's ADA Coordinator at 817.392.8552 or email ADA@fortworthtexas.gov at least 48 hours prior to a meeting.

July 12, 7:00-9:00 PM	Council District 6	Chisholm Trail Community Center; Multi-Purpose Room ○ 4936 McPherson Blvd, Fort Worth, TX 76123
July 20, 7:00-9:00 PM	Council District 5	Brighter Outlook ○ 4910 Dunbar Street, Fort Worth, TX 76105
July 31, 7:00 – 9:00 PM	Council District 8	Bethlehem Center ○ 951 Evans Ave, Fort Worth, TX 76104
August 1, 7:00-9:00 PM	Council District 4	North Park YMCA; Multi-purpose Room ○ 9100 N Beach St, Fort Worth, TX 76244
August 3, 7:00-9:00 PM	Council District 9	Worth Heights Community Center; Activity Room 4 ○ 3551 New York Ave, Fort Worth, TX 76110
August 7, 7:00-9:00 PM	Council District 7	Eaton High School (Northwest ISD); Student Union ○ 1350 Eagle Blvd, Haslet, TX 76052
August 8, 7:00-9:00 PM	Council District 7	UNT Health Science Center; MET Room 109-1011 ○ 3500 Camp Bowie Blvd, Fort Worth, TX 76107
August 10, 7:00-9:00 PM	Council District 2	Northside Community Center; Senior Facility Room ○ 1100 NW 18th St, Fort Worth, TX 76164
August 14, 7:00-9:00 PM	Council District 3	Como Community Center; Kids Café Room ○ 4900 Horne St, Fort Worth, TX 76107
August 15, 7:00-9:00 PM	City-wide	Fort Worth Housing Solutions Administration Building ○ 1201 E. 13th Street, Fort Worth, TX 76102
August 29, 7:00-9:00 PM	City-wide	Fort Worth Housing Solutions Administration Building ○ 1201 E. 13th Street, Fort Worth, TX 76102





Ciudad de Fort Worth y Soluciones de Vivienda de Fort Worth
Aviso de Audiencias Públicas
Evaluación de Equidad de Vivienda



La Ciudad de Fort Worth y Soluciones de Vivienda de Fort Worth llevarán a cabo juntas públicas empezando el 12 de Julio del 2017 hasta el 29 de Agosto del 2017. La intención de estas juntas es de informar a los residentes sobre la Evaluación de Equidad de Vivienda (AFH) y brindar una oportunidad para que todos participen en el proceso de planificación del AFH.

La Evaluación de Equidad de Vivienda es un requisito legal que la Ciudad de Fort Worth y Soluciones de Vivienda de Fort Worth deben completar en orden para seguir recibiendo fondos federales del Departamento de Vivienda y Desarrollo Urbano de Estados Unidos (HUD). Planes del AFH están siendo preparados en orden para afirmativamente promover la equidad de vivienda y proactivamente solucionar cuestiones de equidad de vivienda, especialmente con el uso de fondos federales. El AFH análisis cubre un amplio espectro de cuestiones que afectan la elección de vivienda equitativa, incluyendo los siguientes: demografías regionales, concentraciones raciales y étnicas, concentraciones raciales y étnicas en áreas de pobreza, acceso a oportunidad, desproporcionada necesidad de vivienda, vivienda apoyada públicamente, servicios de vivienda y cuestiones de accesibilidad para personas con discapacidades, y la aplicación local de vivienda equitativa y actividades de propaganda. El AFH también cubrirá cuestiones de vivienda asequible, e identificar prioridades de vivienda equitativa y objetivos específicamente para Fort Worth. El AFH está siendo llevado a cabo de acuerdo con 24 CFR Parte 5.150-5.168 así como las secciones aplicables de 24 CFR Parte 91 y 24 CFR 903 en las regulaciones federales.

Residentes, negocios, organizaciones sin fines de ganancia, iglesias, escuelas, y otros grupos interesados en Fort Worth y comunidades de comunidades de alrededor son incitadas a asistir y proveer ideas. Las juntas han sido programadas en cada distrito del Consejo de la Ciudad. Adicionalmente, juntas que abarcan toda la ciudad han sido programadas en Soluciones de Vivienda de Fort Worth. Personas interesadas pueden atender cualquier junta de su opción, independientemente de la ubicación de la junta. Personas interesadas que no pueden atender, o que desean proveer contribuciones adicionales, también pueden contribuir su ideas y participar en el proceso de la AFH tomando una encuesta por el internet en <http://fortworthtexas.gov/news/2017/05/Fair-Housing-Assessment/>.

Preguntas sobre el proceso del AFH o juntas pueden ser dirigidas a Eric Vodicka al 817-392-7583 o eric.vodicka@fortworthtexas.gov; o Bria Francisco al 817.333.2145 o bfrancisco@fwhs.org.

Personas con discapacidades que puedan necesitar acomodaciones, ayudas auxiliares, o servicios como intérpretes se pide que se pongan en contacto con el Coordinador de ADA de la Ciudad al 817.392.8552 o por correo electrónico a ADA@fortworthtexas.gov por lo menos 48 horas antes de la junta.

Julio 12, 7:00-9:00 PM	Distrito del Consejo 6	Chisholm Trail Centro Comunitario; Salón de Múltiples Usos o 4936 McPherson Blvd, Fort Worth, TX 76123
Julio 20, 7:00-9:00 PM	Distrito del Consejo 5	Brighter Outlook o 4910 Dunbar Street, Fort Worth 76105
Julio 31, 7:00 – 9:00 PM	Distrito del Consejo 8	Centro Bethlehem o 951 Evans Ave, Fort Worth, TX 76104
Agosto 1, 7:00-9:00 PM	Distrito del Consejo 4	Parque Norte YMCA; Salón de Múltiples Usos o 9100 N Beach St, Fort Worth, TX 76244
Agosto 3, 7:00-9:00 PM	Distrito del Consejo 9	Worth Heights Centro Comunitario; Salón de Actividad 4 o 3551 New York Ave, Fort Worth, TX 76110
Agosto 7, 7:00-9:00 PM	Distrito del Consejo 7	Eaton High School (Northwest ISD); Unión de Estudiante o 1350 Eagle Blvd, Haslet, TX 76052
Agosto 8, 7:00-9:00 PM	Distrito del Consejo 7	UNT Centro de Ciencias de la Salud; MET Salón 109-1011 o 3500 Camp Bowie Blvd, Fort Worth, TX 76107
Agosto 10, 7:00-9:00 PM	Distrito del Consejo 2	Northside Centro Comunitario; Salón de Servicios o 1100 NW 18th St, Fort Worth, TX 76164
Agosto 14, 7:00-9:00 PM	Distrito del Consejo 3	Como Centro Comunitario; Cafetería para los niños o 4900 Horne St, Fort Worth, TX 76107
Agosto 15, 7:00-9:00 PM	Abarcando la Ciudad	Soluciones de Vivienda de Fort Worth, Edificio de Administración o 1201 E. 13th Street, Fort Worth, TX 76102
Agosto 29, 7:00-9:00 PM	Abarcando la Ciudad	Soluciones de Vivienda de Fort Worth, Edificio de Administración o 1201 E. 13th Street, Fort Worth, TX 76102





Assessment of Fair Housing **PUBLIC MEETINGS**

These meetings, hosted by Fort Worth Housing Solutions and facilitated by the North Texas Regional Housing Assessment, are intended to report priorities as established through feedback gathered in public engagement efforts to date and to hear the community's comments on draft goals and strategies that may be included in the final Assessment of Fair Housing report.

February 21, 2018

6:00 pm – 8:00 pm
Worth Heights
Community Center
3551 New York Avenue
Fort Worth TX 76110

February 27, 2018

6:00 pm – 8:00 pm
North Side
Community Center
1100 N.W. 18th St
Fort Worth TX 76164

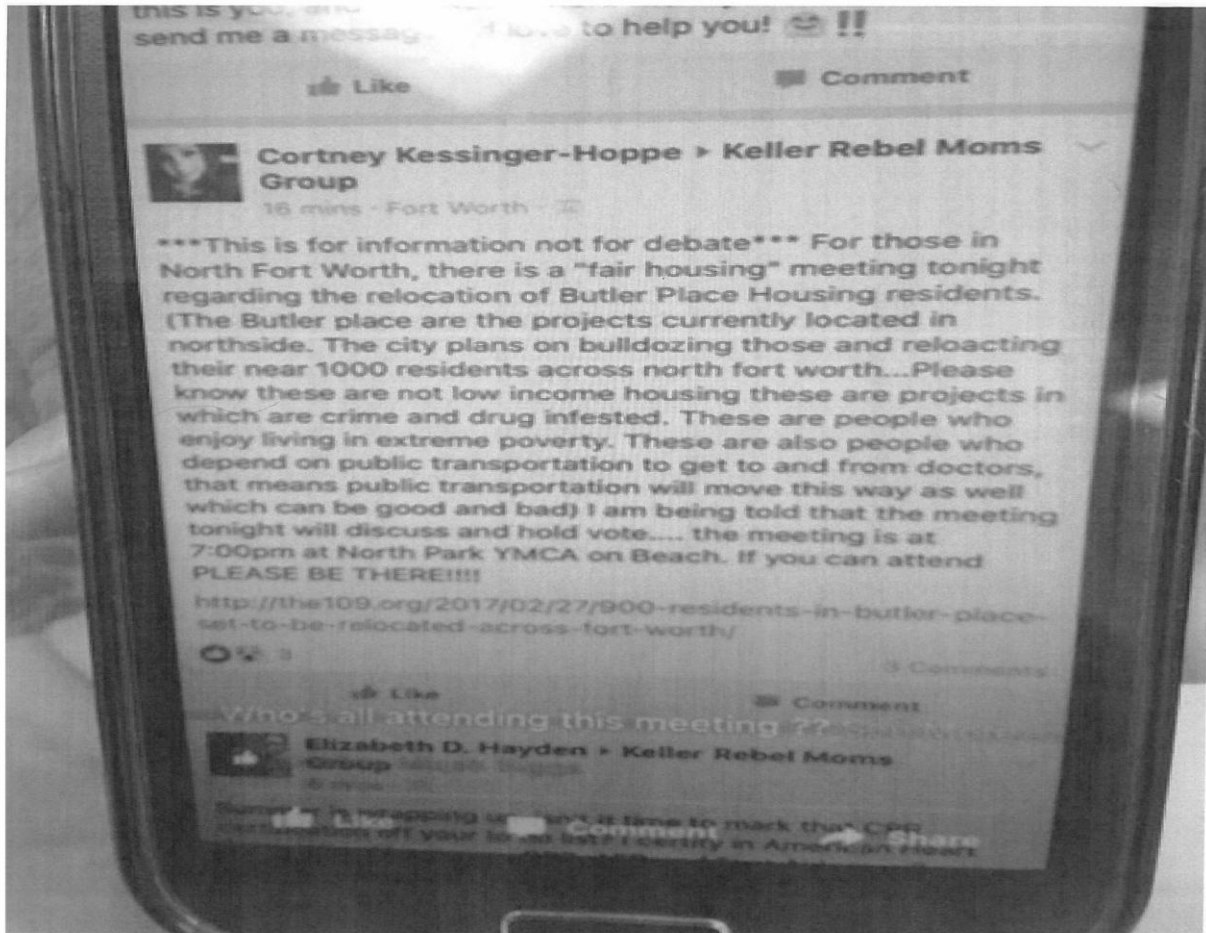


1201 East 13th Street Fort Worth, Texas 76102 PHONE 817 333 3400 FAX 817 332 4830 WWW.FWHS.ORG



Appendices:

Facebook post in advance of public meeting in far north Fort Worth, District 4, 8-1-2017. Post conveys inaccurate information about the purpose of the NTRHA AFH meeting. Additional meetings in council district 7 were cancelled and replaced by FWHS meetings with community leaders about the RAD process.



Appendix: Presentation Slides and Posters for Public Meetings

Round One: CFW/FWHS joint meetings


Assessment of Fair Housing Public Meeting

City of Fort Worth/Fort Worth Housing Solutions



Affirmatively Furthering Fair Housing

- Longstanding Federal mandate for jurisdictions receiving HUD funding
- Updated data driven planning process
 - Based on 2015 AFFH Rule released by HUD
- Focus on assessing access to opportunity



Assessment of Fair Housing Goals

Assess and improve **access to opportunity** for households through strategies such as:



- Targeted neighborhood revitalization
- Development of affordable housing in high opportunity areas
- Preservation of affordable housing
- Other ideas

Regional Collaboration

- HUD encourages collaborative regional plans
- Both the CFW and FWHS must produce plans
- CFW and FWHS (UTA) are collaborating on:
 - Public Hearings
 - Focus groups
 - Survey data
- North Texas Regional Housing Assessment
 - 20 member consortium of cities and public housing authorities staffed by UTA researchers


Assessment of Fair Housing Requirements

- Identify fair housing issues and barriers to access to opportunity
- AFFH assessment must guide:
 - use of HUD funds by recipients
 - consolidated planning

What contributes to opportunity?

- Education
- Employment
- Transportation
- Low poverty neighborhoods
- Environmentally healthy neighborhoods
- Other?



Assessing Disparities in Access to Opportunity

HUD Protected Classes

- Race
- Color
- Religion
- Familial Status
 - Presence of at least one child under 18
 - Pending pregnancy or adoption
- National origin
- Sex (gender)
- Disability

Other AFH Issues of Interest

- Age
- Ethnicity
- Family size
- Limited English proficiency
- Source of income (private versus publicly supported)
- Zip code or neighborhood
- Housing tenure: Homeowners and Renters



AFH Project Timeline



OPPORTUNITIES FOR INPUT!

- CFW Survey available online at:
 - <http://fortworthtexas.gov/fairhousing/afh/>
- North Texas Regional Survey online at:
 - <http://northtexasrha.com/survey/>
- Focus groups (Residents and subject matter experts)
- Public meetings
 - Input to plan development – Today!
- Public hearings on draft plan
 - Comments on draft plan

AFH Community Input Meetings Schedule

Council District	Date, Time, and Location
District 6	Wednesday, July 12 Chisholm Trail Community Center, 7:00-9:00 pm
District 5	Thursday, July 20 MLK Community Center, 7:00-9:00 pm
District 8	Monday, July 31 Bethlehem Community Center, 7:00-9:00 pm
District 4	Tuesday, August 1 North Park YMCA, 7:00-9:00 pm
District 9	Thursday, August 3 Worth Heights Community Center, 7:00-9:00 pm
District 7	Monday, August 7; Eaton High School, Northwest ISD, 7:00-9:00 pm Tuesday, August 8; UNTHSC, MET room; 7:00-9:00 pm
District 2	Thursday, August 10 Northside Community Center, 7:00-9:00 pm
District 3	Monday, August 14 Como Community Center, 7:00-9:00 pm

HUD DATA: <https://egis.hud.gov/affht/>

- Developed for AFH efforts nationwide
- Maps are being continuously corrected and improved
- Raw data made available to the public
- UTA will be updating maps for their regional analysis



So let's get started!

- Visit stations around the room and take in the information
- Five Stations:
 - General Information
 - Racially/Ethnically Concentrated Areas of Poverty
 - Publicly Supported Housing
 - Measuring Access to Opportunity (HUD Indices of Opportunity)
 - Access to Housing Opportunity
- Each Station has:
 - Voting Board(s) – to get your input on contributing factors to barriers to opportunity
 - Maps describing housing conditions in Fort Worth area based on data from the US Census and the American Communities Survey from 2010 to 2013

Make your voice heard!

- **Talk to staff:**
 - Available to answer your questions
- **Vote** for your top three priorities for contributing factors preventing access to opportunity
 - Or mass your votes to show emphasis
- Complete surveys on paper or on-line to **provide written comments**
 - Barriers to housing access, sustainability, quality, affordability
 - Recommendations for solving housing problems and improving access to opportunity
- **Regroup for final comments**

Station One

General Information

Data from 2010 US Census and American Community Survey (2009-2013), including:

- Definitions of HUD protected classes
- Race/ethnicity – percent residents black, white, Hispanic, Asian/Pacific Islander, Native American
- National Origin
- Limited English Proficiency
- Persons with disabilities by age
 - Voting Board

Station One

HUD Protected Classes

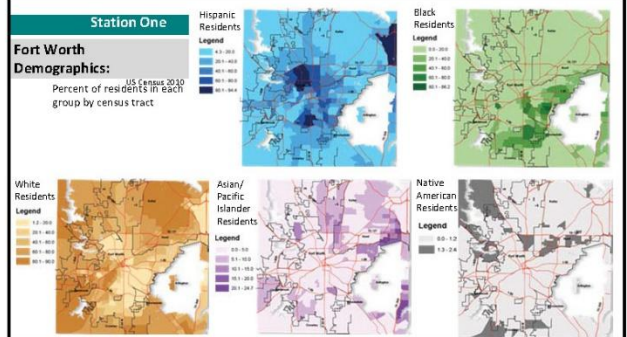
- Race
- Color
- Religion
- Familial Status
 - Presence of at least one child under 18
 - Pending pregnancy or adoption
- National origin
- Sex (gender)
- Disability



Station One

Fort Worth Demographics:

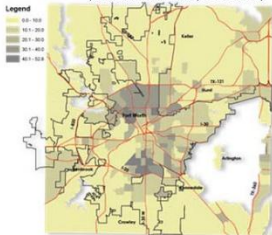
US Census 2010
Percent of residents in each group by census tract



Station One

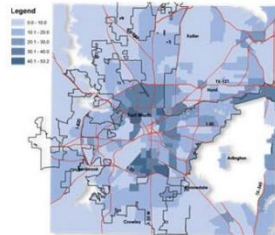
Residents reporting Limited English Proficiency

2010 US Census
(Percent of residents by census tract)



Residents reporting non-US National Origin

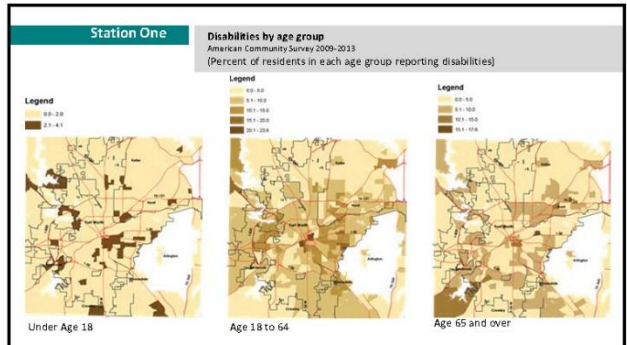
2010 US Census
(Percent of residents by census tract)



Station One

Disabilities by age group

American Community Survey 2009-2013
(Percent of residents in each age group reporting disabilities)

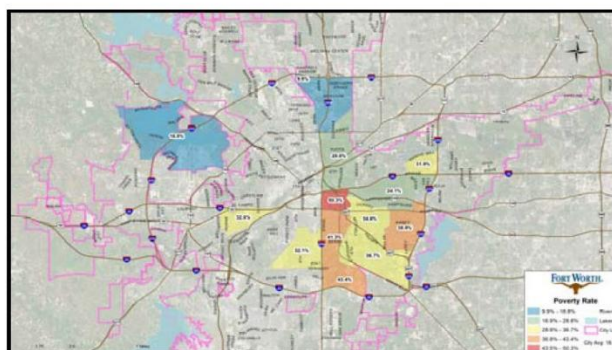


Station One	
What factors significantly contribute to the severity of housing problems for persons with disabilities?	
POSSIBLE FACTORS	VOTES (Top 3 Priorities)
Lack of accessible, proficient schools	
Lack of accessible publicly supported housing	
Lack of accessible transportation	
Inaccessible government facilities or services	
Inaccessible public or private infrastructure (sidewalks, laundry facilities, offices, parking, common areas, etc.)	
Lack of affordable in-home or community-based supportive services	
Lack of affordable, accessible housing in range of unit sizes	
Lack of assistance for housing accessibility modifications	
Lack of assistance for transitioning from institutional settings to integrated housing	
Lending discrimination	
State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings	

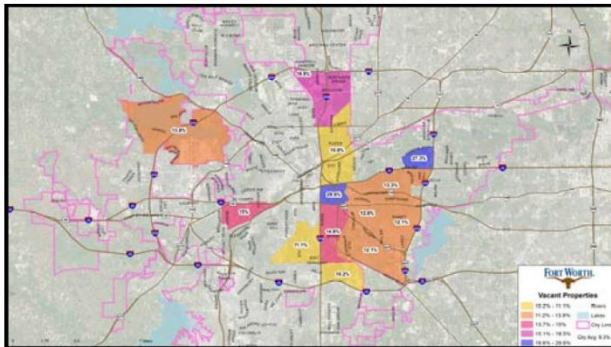
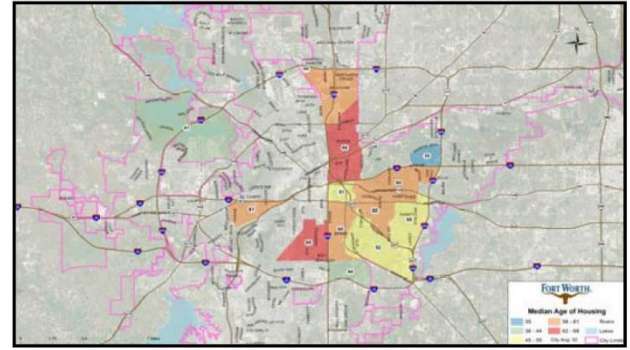
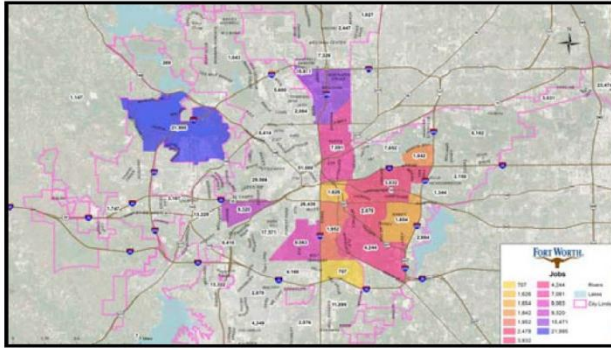
Station Two	
Voting Board	R/ECAPs <small>US Census 2000, ACS (2009-2013)</small> Racially/Ethnically Concentrated Areas of Poverty HUD Definition: Census tracts with • 50% or more non-white residents and • 40% or more residents with incomes below the federal poverty rate for their family size
Maps	
2010 R/ECAPs in FWHS jurisdiction Employment growth centers and bus lines	

Station Two	
Racially and Ethnically Concentrated Areas of Poverty	
Fort Worth R/ECAPs Six census tracts remained R/ECAPs throughout 1990, 2000 and 2010 Twelve new census tracts became R/ECAPs in 2010	
What contributes to racially and ethnically concentrated areas of poverty and how do we increase access to opportunity for people living in these communities?	

Station Two	
What factors create, contribute to, perpetuate, or increase the severity of Racially/Ethnically Concentrated Areas of Poverty?	
POSSIBLE FACTORS	VOTES (Top 3 Priorities)
Community opposition	
Deteriorated and abandoned properties	
Lack of community revitalization strategies	
Lack of investments in specific neighborhoods	
Location and type of affordable housing	
Loss of affordable housing	
Private discrimination	
Source of income discrimination	



Station Two	
Employment Growth Centers with Bus Routes	



Station Three

Publicly Supported Housing

- Voting Board
- FWHS Maps
- Tenant-based voucher assistance
- Public Housing

Program Types

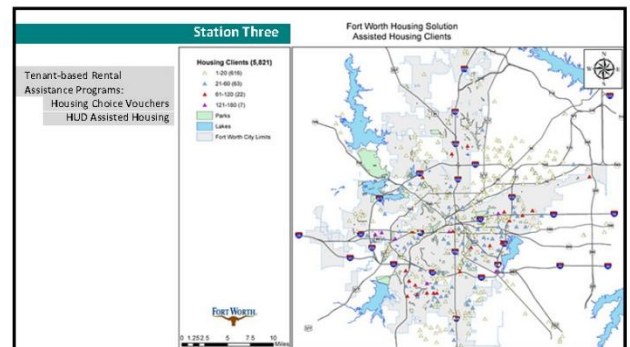
Tenant-based rental assistance (including Housing Choice Vouchers)

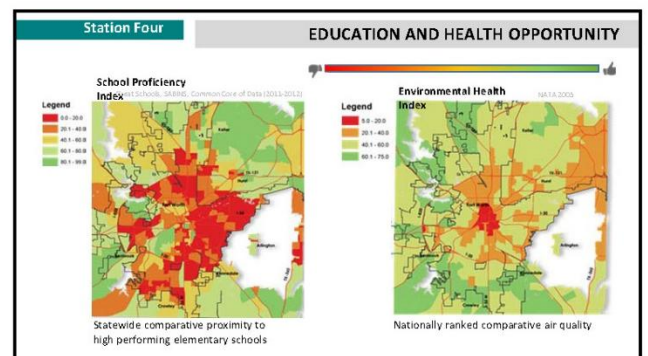
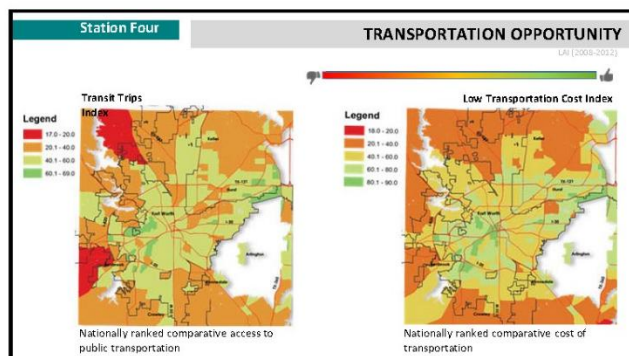
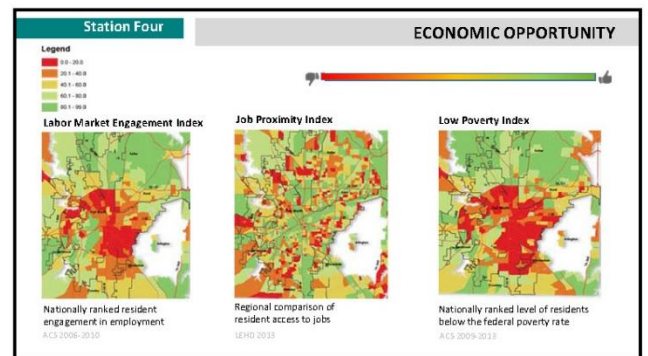
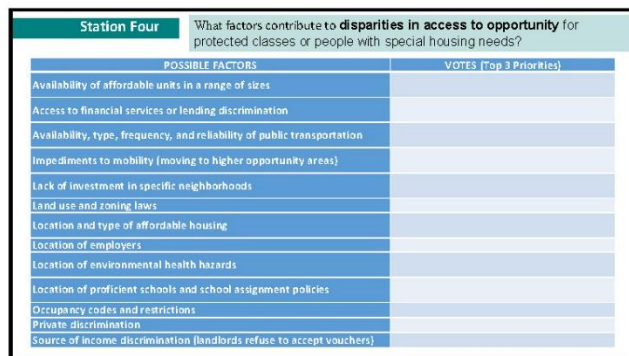
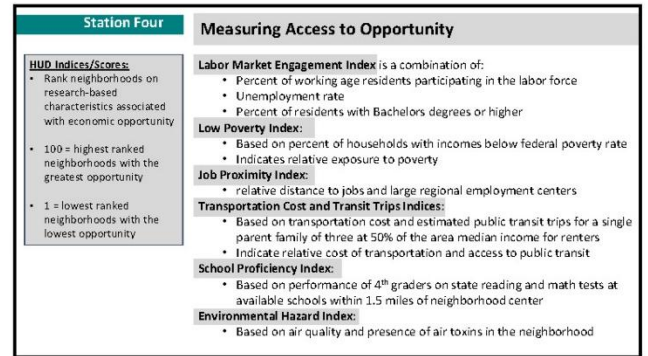
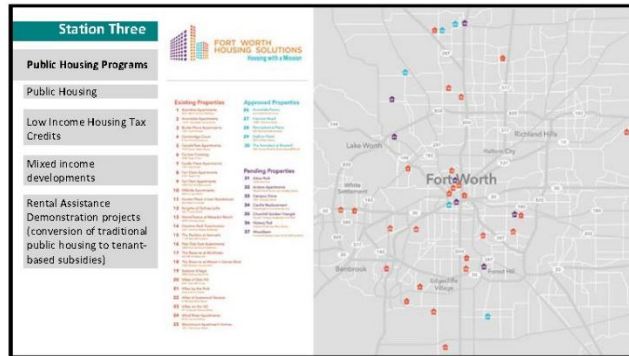
- Tenant pays 30% of income to landlord
- FWHS pays balance based on federal standards for Fair Market Rent
- Landlord can accept or refuse

Public Housing (including):

- Properties owned by local housing authority (traditional)
- Rental Assistance Demonstration
 - Public housing being transitioned to rental assistance
 - Permits redevelopment of aging public housing
- Low Income Housing Tax Credit properties
 - Privately developed for mixed income communities
 - Financed by sale of state-issued tax credits
- Project-based vouchers
 - Developer applies, subsidies stay with the property

Station Three: What factors significantly contribute to fair housing issues related to publicly supported housing?	
POSSIBLE FACTORS	VOTES (Top 3 Priorities)
Admissions and occupancy policies and procedures	
Loss of affordable housing and increasing rents	
Lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking	
Lack of access to publicly supported housing in high opportunity areas	
Language barriers in serving tenants with limited English proficiency	
Lack of investment in specific neighborhoods (public or private) in affordable housing or amenities and services	
Lack of information about publicly supported housing programs	
Policies, practices or community opposition that limit location of publicly supported housing, including tax credit projects	
Source of income discrimination (landlords will not accept housing vouchers)	






Station Five

Access to Housing Opportunity

- Voting Boards
- Housing problem factors
- Fair Housing enforcement
- Maps
- Housing Problems – total households
- Housing Cost Burden – total households
- Homeownership rates by census tract
- Renter rate by census tract



Station Five

Housing Problems

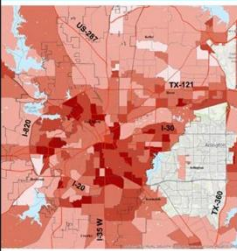
(2008-2012 CHAS/ACS)

Legend

- 14.4 - 20.0
- 20.1 - 30.0
- 30.1 - 40.0
- 40.1 - 50.0
- 50.1 - 55.4

Percent of households reporting lack of complete kitchen or plumbing, more than one person per room, or spending more than 30% of income on housing and utilities

Up to 65% of households in some census tracts report one or more housing problems (darkest shaded areas).



What contributes to problems with housing?

What do families need to help them maintain their homes in good condition?

For renters?

For homeowners?

Station Five

Housing Cost

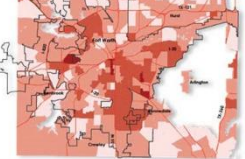
(2008-2012 CHAS/ACS Data)

Legend

- 1.0 - 10.0
- 10.1 - 20.0
- 20.1 - 30.0
- 30.1 - 40.0
- 40.1 - 50.0

Percent of households reporting housing cost burden

Up to 33% of households report spending more than 30% of their income on housing and utilities (darkest shaded areas).



What are the biggest factors driving up the cost and price of housing in these areas?

What would make housing more affordable?

Station Five

Fair Housing Enforcement

The Fair Housing Act protects people from discrimination when they are renting, buying, or securing financing for any housing. The prohibitions specifically cover discrimination because of race, color, national origin, religion, sex, disability and the presence of children.

What factors would help improve fair housing enforcement, outreach and education and reduce the severity of fair housing issues?

POSSIBLE FACTORS	VOTES (Top 3 Priorities)
Local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.)	
Local fair housing enforcement by public agencies and government	
Resources (staff, budget, etc.) for fair housing enforcement agencies and organizations	
State or local fair housing laws	
Resolution of violations of fair housing or civil rights law	

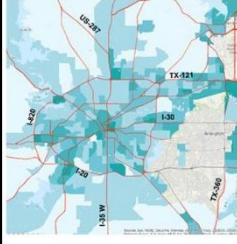
Station Five

Fort Worth Renters 2013

Percent of households who are renters by census tract

Legend

- 0.0 - 20.0
- 20.1 - 40.0
- 40.1 - 60.0
- 60.1 - 80.0
- 80.1 - 100.0



What challenges do renters face in finding safe, quality, affordable housing where they can meet their needs for jobs, transportation, education, and services?

What supports and services might help them the most?


Station Five

Fort Worth Homeowners 2013

Percent of households who are homeowners by census tract

Legend

- 0.0 - 20.0
- 20.1 - 40.0
- 40.1 - 60.0
- 60.1 - 80.0
- 80.1 - 100.0



What challenges do homeowners find in maintaining the quality and affordability of their housing?

What would help more people become homeowners?

Station Five

What contributes to housing problems: For renters? For homeowners?

POSSIBLE FACTORS	VOTES (Top 3 Priorities)
Older homes need extensive repairs	
Landlords failing to maintain property	
Rapidly rising rents	
Difficulty obtaining a mortgage loan	
Lack of money for down payment	
Sellers won't make needed repairs for buyers	
Lack of police protection or visibility in the neighborhood	
Increasing property taxes	

Public Meeting: Fort Worth Housing Solutions central office

Fort Worth Housing Solutions Community Meeting August 29, 2017

Flora Alexandra Brewer, MPA, Researcher



UNIVERSITY OF TEXAS ARLINGTON



Affirmatively Furthering Fair Housing

- Longstanding Federal mandate for jurisdictions receiving HUD funding
- Updated data driven planning process
- Focus on assessing access to opportunity



What contributes to opportunity?

- Education
- Employment
- Transportation
- Low poverty neighborhoods
- Environmentally healthy neighborhoods
- Other?



3

Assessment Of Fair Housing (AFH) Requirements

Jurisdictional and regional analysis

Identify fair housing and access to opportunity issues

Set goals and priorities for action

Guide use of federal funds



What contributes to differences in housing needs and access to opportunity?

HUD Protected Classes

- Race
- Color
- Religion
- Familial Status
 - Presence of at least one child under 18
 - Pending pregnancy or adoption
- National origin
- Sex (gender)
- Disability

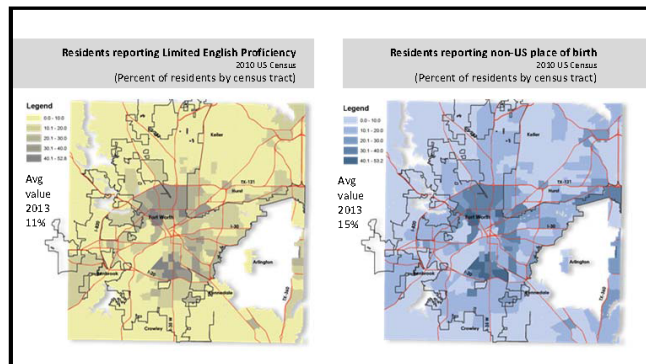
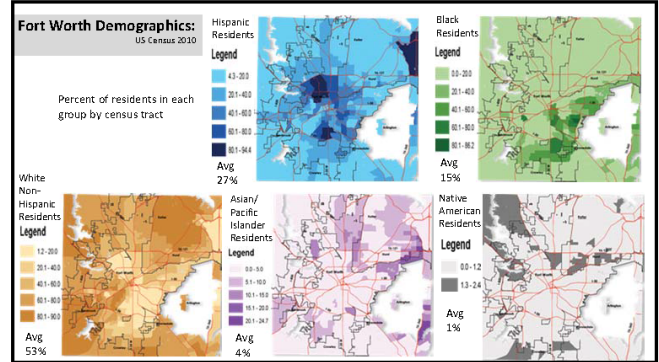
Other AFH Issues of Interest

- Age
- Ethnicity
- Family size
- Limited English proficiency
- Source of income (private versus publicly supported)
- Zip code or neighborhood
- Housing tenure: Homeowners and Renters

OPPORTUNITIES FOR INPUT!

- CFW Survey available online at:
 - <http://fortworthtexas.gov/fairhousing/afh/>
- North Texas Regional Survey online at:
 - <http://northtexasrha.com/survey/>
- Focus groups (Residents and subject matter experts)
- Public meetings
 - Input to plan development – Today!
- Public hearings on draft plan

What affects housing needs and opportunities?



What factors contribute to challenges in access to opportunity for protected groups or people with special housing needs?

POSSIBLE FACTORS
Availability of affordable units in a range of sizes
Access to financial services or lending discrimination
Availability, type, frequency, and reliability of public transportation
Impediments to mobility (moving to higher opportunity areas)
Lack of investment in specific neighborhoods
Land use and zoning laws
Location and type of affordable housing
Location of employers
Location of environmental health hazards
Location of proficient schools and school assignment policies
Occupancy codes and restrictions
Private discrimination
Source of income discrimination (landlords refuse to accept vouchers)

Let's talk about the search for housing:

What challenges or difficulties did you face in finding housing where you wanted to live?

What helped you the most to find a place to live?

Who uses publicly supported housing in Fort Worth?

Table 6 - Publicly Supported Households by Race/Ethnicity

Housing Type	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	57	6.24%	744	81.40%	106	11.60%	7	0.77%
Project-Based/Affordable Housing	654	32.01%	948	46.40%	399	19.53%	40	1.96%
Other Multifamily	238	60.56%	110	27.99%	39	9.92%	5	1.27%
HCV Program	914	13.66%	5,198	77.69%	545	8.15%	27	0.40%
All Programs	1,863	19%	7,000	70%	1,089	11%	79	1%
Total Households	133,655	50.40%	52,649	19.85%	66,749	25.17%	8,010	3.02%
0-30% of AMI	12,230	29.75%	13,700	33.32%	12,725	30.95%	1,695	4.12%
0-50% of AMI	20,385	26.94%	22,330	29.51%	26,260	34.71%	2,430	3.21%
0-80% of AMI	40,070	32.82%	31,784	26.04%	42,240	34.60%	3,160	2.59%

Total FWHS Units March 2017, all programs: 10,888

Publicly Supported Housing

What challenges do people face when trying to use FWHS housing vouchers?

Are the challenges different depending on the location of the housing?

What FW housing authority policies affect housing choices for people using publicly supported housing?

PERSONS IN FAMILY	POVERTY GUIDELINE
1	\$10,830
2	14,570
3	18,510
4	22,080
5	25,790
6	29,510
7	33,240
8	37,000
For families with more than 8 persons, add \$3,740 for each additional person.	

R/ECAPs (US Census 2000, ACS (2009-2013))

Racially/Ethnically Concentrated Areas of Poverty

HUD Definition:

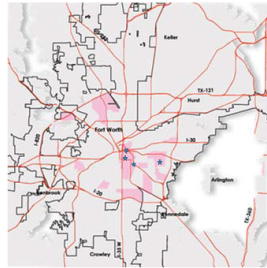
Census tracts with

- 50% or more non-white residents and
- 40% or more residents with incomes below the federal poverty rate for their family size

Racially and Ethnically Concentrated Areas of Poverty

Fort Worth R/ECAPs

- Four census tracts remained R/ECAPs throughout 1990 (6), 2000 (9), 2010 (13), and 2013 (21)
- Ten new census tracts became R/ECAPs in 2013
- 23 highest poverty census tracts (2013) average 89% nonwhite residents
- 23 highest nonwhite census tracts (2013) average 39% residents with incomes below poverty line



What factors contribute to Racially/Ethnically Concentrated Areas of Poverty?

POSSIBLE FACTORS

- Community opposition
- Deteriorated and abandoned properties
- Lack of community revitalization strategies
- Lack of investments in specific neighborhoods
- Location and type of affordable housing
- Loss of affordable housing
- Private discrimination
- Source of income discrimination

Tell us a little about your neighborhood (including availability of transportation, education, safety and health, healthy food, etc.):

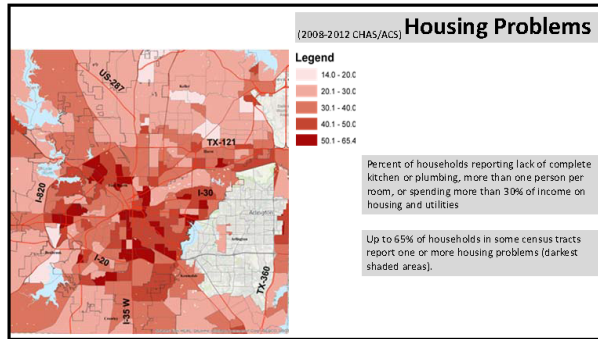
What do you like best about your neighborhood or community?

What are the things that you don't like or that could be improved?

What would help the most to improve your current neighborhood?

What is it about where you live that keeps you from getting ahead? For example, transportation, schools, safety and health, access to jobs, etc.

Where would you live if you could? Why? What keeps you from moving there?



Tell us about your home where you currently live:

What do you like best about the property where you live?

What do you like the least? What problems do you face with the property?

What has helped you the most to overcome problems with your current home?

Let's talk about paying for housing:

What does it take to be able to pay for rent or utilities? How do people sacrifice in other areas?

What helps people the most to be able to afford their homes?

Let's talk about buying a home versus renting a home: What would you prefer?

What are the challenges to buying or renting?

In what ways do you feel some people may have been discriminated against or treated unfairly in attempts to buy or rent a home?

What has helped you the most to be able to buy or rent the home you want?

Disabilities

What factors significantly contribute to the severity of housing problems for persons with disabilities?

POSSIBLE FACTORS

- Lack of accessible, proficient schools
- Lack of accessible publicly supported housing
- Lack of accessible transportation
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure (sidewalks, laundry facilities, offices, parking, common areas, etc.)
- Lack of affordable in-home or community-based supportive services (personal assistance, etc.)
- Lack of affordable, accessible housing in range of unit sizes
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lending discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings

Fair Housing Education and Enforcement

The Fair Housing Act protects people from discrimination when they are renting, buying, or securing financing for any housing. The prohibitions specifically cover discrimination because of race, color, national origin, religion, sex, disability and the presence of children.

What factors significantly contribute to opportunities to improve fair housing enforcement, outreach and education, and reduce the severity of fair housing issues?

POSSIBLE FACTORS

Local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.)

Local fair housing enforcement by public agencies and government

Resources (staff, budget, etc.) for fair housing enforcement agencies and organizations

State or local fair housing laws

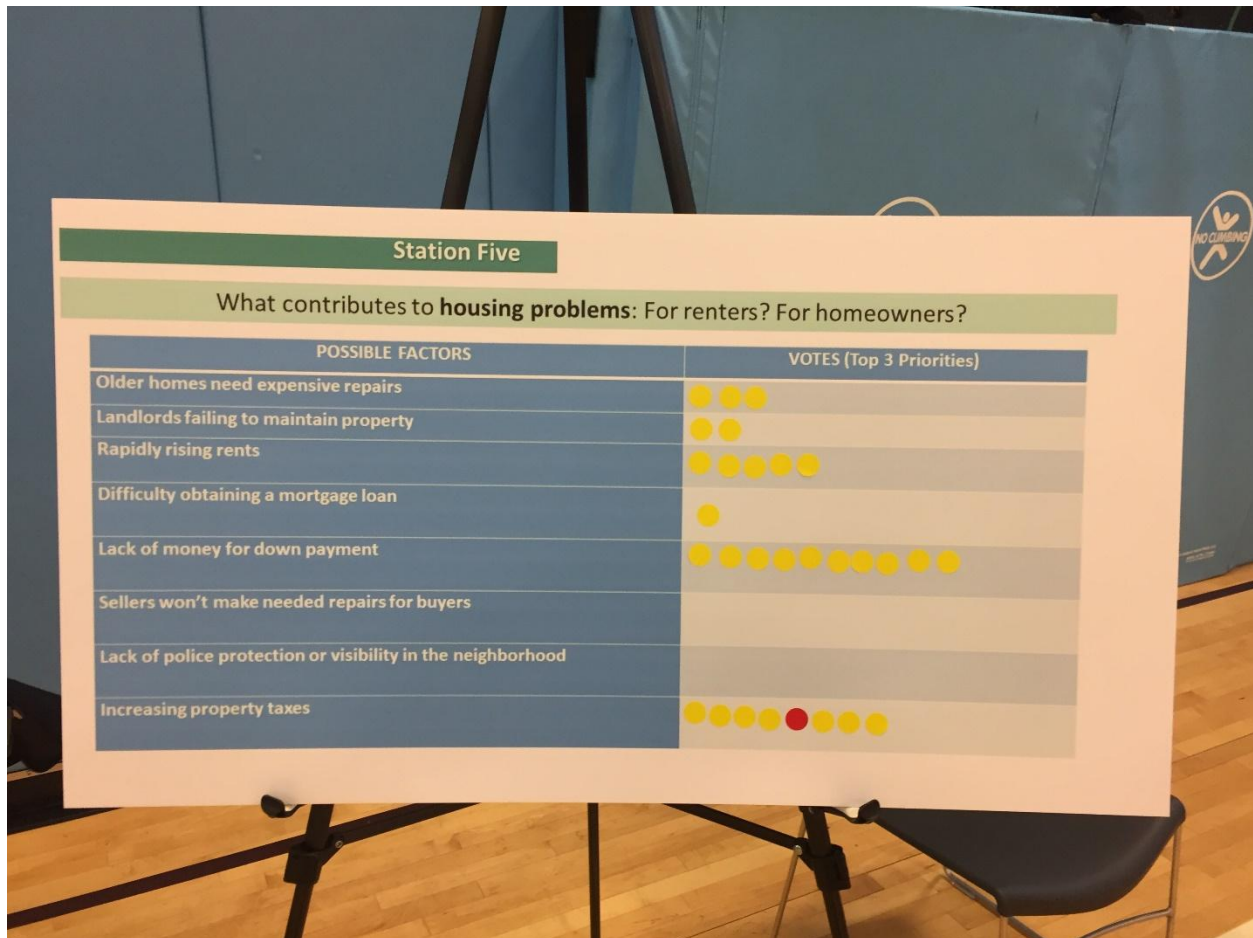
Resolution of violations of fair housing or civil rights law

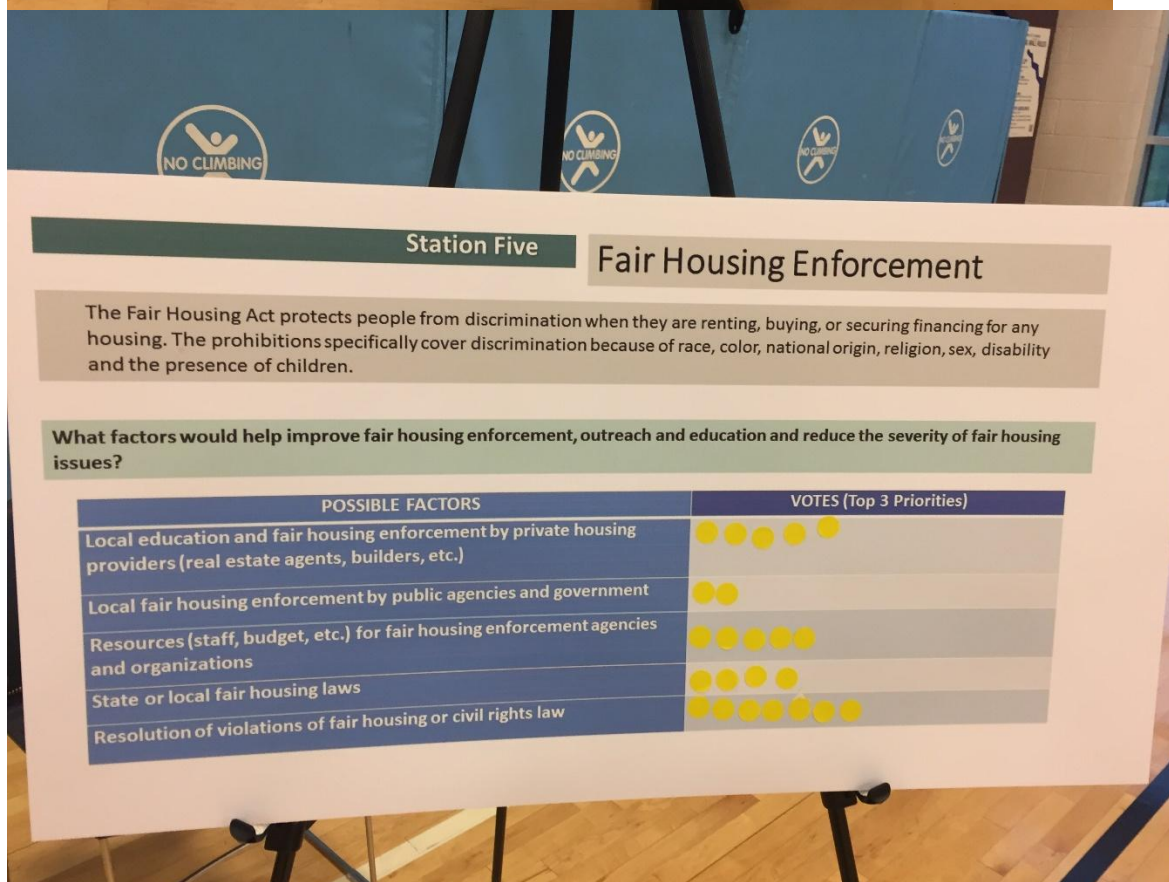
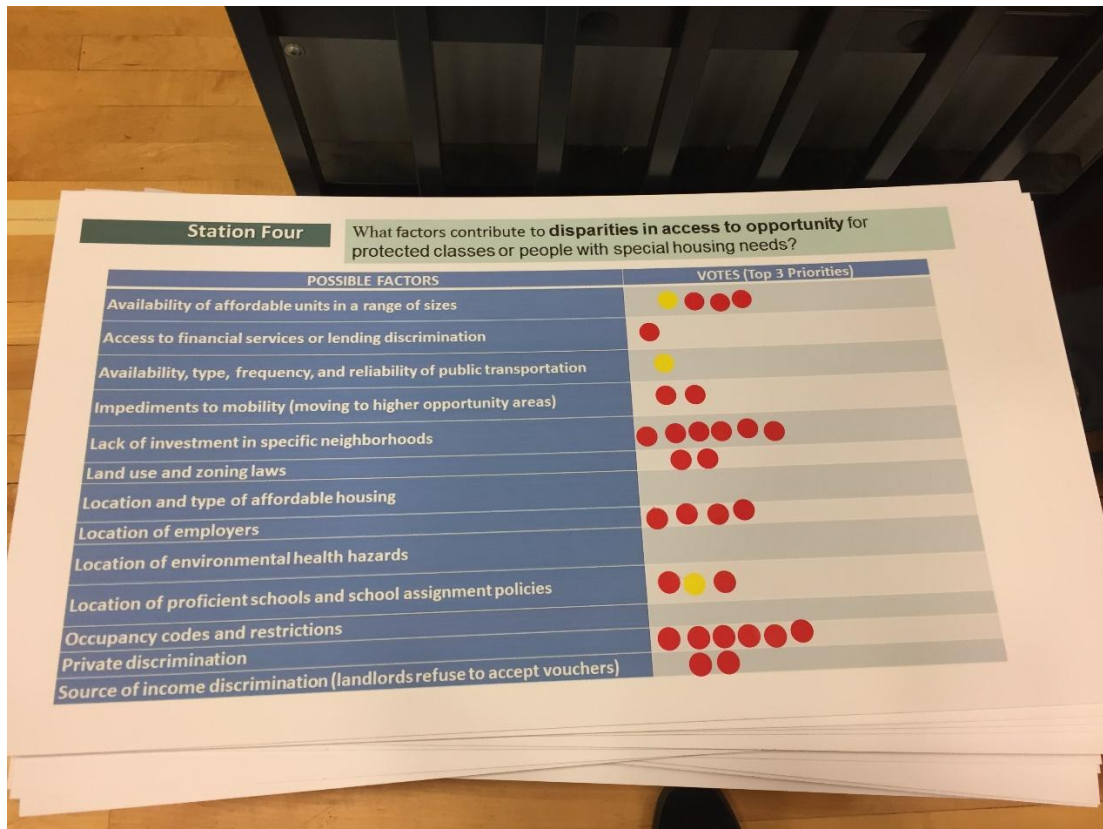
What affordable housing choices are we missing in Fort Worth? What would you like to see?

Is there anything that we missed? What message would you like to send to people making plans to improve housing in McKinney?

Appendices: Public Meeting Voting board Samples

Posters used to invite meeting attendees to vote for top three most important contributing factors to fair housing issues. Samples from July 2017 meetings.





Station One

What factors significantly contribute to the severity of housing problems for persons with disabilities?

POSSIBLE FACTORS	VOTES (Top 3 Priorities)
Lack of accessible, proficient schools	3
Lack of accessible publicly supported housing	3
Lack of accessible transportation	1
Lack of accessible government facilities or services	0
Lack of accessible public or private infrastructure (sidewalks, laundry facilities, parking, common areas, etc.)	1
Lack of affordable in-home or community-based supportive services	5
Lack of affordable, accessible housing in range of unit sizes	4
Lack of assistance for housing accessibility modifications	4
Lack of assistance for transitioning from institutional settings to integrated housing	2
Ending discrimination	0
State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings	1

Station Three

What factors significantly contribute to fair housing issues related to publicly supported housing?

POSSIBLE FACTORS	VOTES (Top 3 Priorities)
Admissions and occupancy policies and procedures	5
Loss of affordable housing and increasing rents	1
Lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking	0
Lack of access to publicly supported housing in high opportunity areas	1
Language barriers in serving tenants with limited English proficiency	0
Lack of investment in specific neighborhoods (public or private) in affordable housing or amenities and services	6
Lack of information about publicly supported housing programs	3
Policies, practices or community opposition that limit location of publicly supported housing, including tax credit projects	6
Source of income discrimination (landlords will not accept housing vouchers)	1

Appendices: Posters and presentation materials for FWHS Round 2 Public Meetings February 2018

Assessment of Fair Housing

Fort Worth Housing Solutions Public Meetings
February 21 and 27, 2018



AGENDA

- Assessment of Fair Housing (AFH) Progress
- Data Analysis and Public Input
 - Key findings
 - Top priorities
- Suggested Goals
- Rate Draft Goals – Posters
- Regroup for Final Comments
- Moving Forward

Assessment of Fair Housing (AFH) - Progress

- FWHS public participation (2017)
- Analysis of public input and fair housing data
- Surveys and discussions continue

9 Focus Groups	10 Public Meetings
411+ Participants	
1,765 Surveys (CFW/NTRHA)	75 Events, Meetings, Interviews

Data Analysis and Feedback

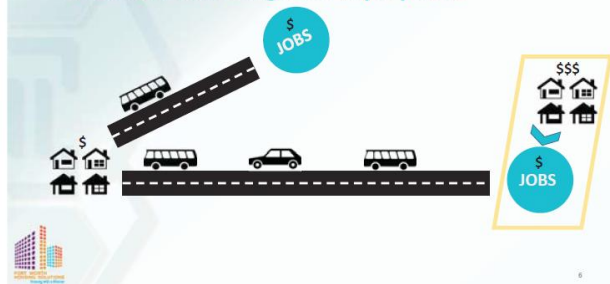
Key Findings

- Segregation
- Concentration of Poverty
- Location of Publicly Supported Housing
- Housing Cost Burden

Most Common Problems Identified by the Community

- Lack of affordable housing
- Community investment, revitalization of neighborhoods
- Discrimination
- Lack of affordable, community-based housing with services for persons with disabilities
- Lack of affordable transportation
- Resources for fair housing enforcement

Overall Issue: Location of Housing and Employment



Draft Goals

- Increase access to affordable housing in high opportunity areas
- Increase supply of affordable housing units
- Increase supply of accessible, affordable housing for persons with disabilities
- Increase access to information and resources on fair and affordable housing
- Maintain and improve the quality, management, and community impact of publicly supported housing



7

Rate Draft Goals

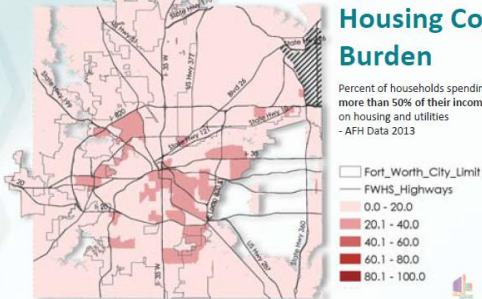
- Visit the posters around the room
- UTA students, City and FWHS staff are available to answer questions
- Example strategies provided for each goal
- Rate each goal by placing sticker in the appropriate box
 - High, Medium, Low importance or Not important
- Use sticky notes to leave comments
- Regroup for final group discussion



8

Severe Housing Cost Burden

Percent of households spending more than 50% of their income on housing and utilities
- AFH Data 2013

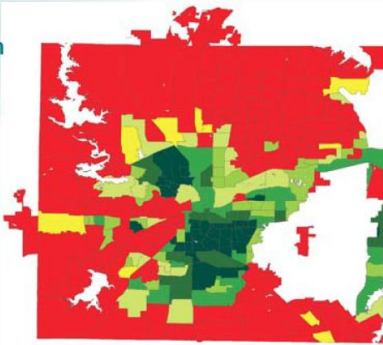


Racial Segregation FWHS Jurisdiction

Legend

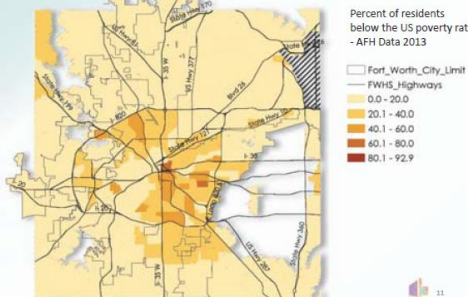
- % white greater than avg
- % nonwhite = avg
- % nonwhite < 10% > avg
- % nonwhite < 20% > avg
- % nonwhite < 30% > avg
- % nonwhite < 40% > avg
- % nonwhite > 40% > avg

Data source: ACS 2015



Poverty

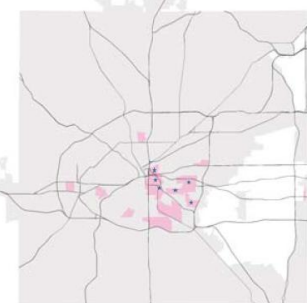
Percent of residents below the US poverty rate
- AFH Data 2013



Racially and Ethnically Concentrated Areas of Poverty

Fort Worth R/ECAPs

- R/ECAP: 40% or more with incomes below poverty rate, 50% or more nonwhite *
- Six census tracts remained R/ECAPs throughout 1990 (total 6), 2000 (9), 2010 (13), and 2015 (21)
- Twelve new census tracts became R/ECAPs in 2010
- 21 highest poverty census tracts (2015) ranged from 40% to 80% poverty with an average 90% nonwhite residents
- 21 highest nonwhite census tracts (2015) ranged from 94% to 99% nonwhite with an average 39% poverty



Low Income Housing Gap (LIHTCs)

NTRHA Cities	# of LIHTC Units TDHCA 2017	# of Housing Units NTCOS of Total Housing Units (2017)	% Total Households < \$25k annual income (2016 ACS)	Median Household Income (ACS 2016)	\$25k as % of Median Household Income (2016 ACS)
Cleburne	703	11,302	6.2%	\$ 49,573	50%
Fort Worth	13,698	314,761	4.4%	\$ 54,876	46%
Denton	2,156	52,044	4.1%	\$ 50,487	50%
Dallas	20,116	542,928	3.7%	\$ 42,215	55%
McKinney	2,262	61,220	3.7%	\$ 83,257	30%
Garland	1,287	82,787	1.6%	\$ 53,220	47%
Irving	1,322	96,160	1.4%	\$ 54,868	47%
Plano	1,174	109,813	1.1%	\$ 85,085	29%
Frisco	404	58,150	0.7%	\$ 117,642	21%

LIHTC – Low Income Housing Tax Credit projects

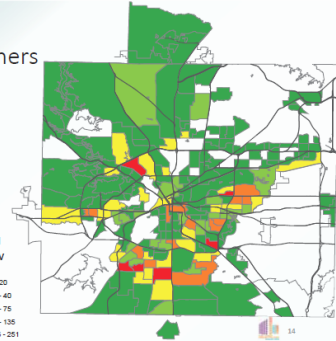
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Location of FWHS Housing Choice Vouchers

- 5,442 FWHS vouchers (Households) spread over 195 Census Tracts
- 2,719 FWHS vouchers (50%) in 22 Census Tracts (11%)

Legend
FW_HCV Count

- 1 - 20
- 21 - 40
- 41 - 75
- 76 - 135
- 136 - 251



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Rate Goal

Goal A: Increase access to affordable housing in high opportunity areas

Any comments? Please use notes provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Provide mobility counseling and support for improved access/use of vouchers
- Support regional fair market rent analysis to help to make vouchers competitive
- Locate new affordable housing in high opportunity areas
- Implement Small Area Fair Market Rent program to offer higher rents in higher cost areas
- Recruit and attract landlords in high opportunity areas with incentives
- Recruit landlords for "second chance" housing for persons with background problems

Rate Goals

Goal B: Increase supply of affordable housing units

Any comments? Please use notes provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Collaborate with area partners to develop Tarrant County strategic plan for affordable housing
- Continue to develop mixed income housing throughout the community
- Seek funding to expand Family Self-Sufficiency program increasing access to home ownership
- Partner with City to expand home repair programs to include multi-family, rental property, attract and retain landlords
- Partner with City to implement strategies to address community opposition and barriers to site selection for affordable housing

Rate Goals

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

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Use special subsidy programs to increase accessible, affordable housing for persons with disabilities

Rate Goals

Goal D: Increase access to information and resources on fair and affordable housing

Any comments? Please use paper provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Partner with fair housing agencies to expand fair housing information access to persons seeking publicly assisted housing
- Reach out to seniors and persons with disabilities to communicate opportunities for assistance with guardianship, supportive services, and housing modifications

Rate Goals


Goal E: Maintain/improve quality, management, community impact of publicly supported housing

Any comments? Please use notes provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Expand processes for monitoring property management, maintenance, and community impact of publicly supported housing
- Expand processes for working with partners to prevent and solve problems at properties
- Continue to contribute to community revitalization through property redevelopment
- Advocate for and address transportation needs of persons in publicly supported housing



Moving forward

- Complete public meetings for input on goals
- Continue gathering survey data
- Summarize findings and feedback
- Report to public comments and analysis

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Appendix: Low Income Housing Tax Credit Projects in FWHS jurisdiction (Texas Department of Housing and Community Affairs, 2017)

Board Approval	Project Name	Project City	Total Units	LIHTC Units	% LIHTC Units	Population Served
1990	Vickery Square Apartments	Euless	60	60	100%	General
1990	Candle Chase Apartments	Fort Worth	116	116	100%	General
1990	Whispering Run Apartments	Hurst	108	108	100%	General
1990	Wellesley Park Apartments	Hurst	197	197	100%	General
1990	Emerald Run Apartments (fka Copper Creek)	NRH	108	108	100%	General
1991	Mission Pointe (fka) Country Villa	Euless	260	260	100%	General
1992	Mansfield Retirement	Mansfield	52	52	100%	General
1993	Ash Lane Apartments	Euless	250	250	100%	General
1993	The Garden Gate Apartments	Fort Worth	240	240	100%	General
1993	Lago Vista Apartments	Fort Worth	260	260	100%	General
1993	Shadow Hill Apartments (fka Spring Hill)	Fort Worth	254	254	100%	General
1993	Spring Glen (fka Shadow Glen Apartments)	Fort Worth	176	176	100%	General
1994	Historic Electric Building	Fort Worth	106	62	58%	General
1995	The Lakes Of Williamsburg Apartments	Grapevine	224	224	100%	General
1995	Rock Island Hillside	Fort Worth	175	105	60%	General
1995	Autumn Chase Apartments	Fort Worth	184	138	75%	General
1996	Pennsylvania Place Apartments	Fort Worth	152	152	100%	General
1996	Cornerstone Apartments	Haltom City	74	74	100%	General
1997	Fort Worth Villas By The Lake	Fort Worth	234	140	60%	General
1998	Azle Village	Azle	32	31	97%	Elderly
1998	Villas of Marine Creek	Fort Worth	148	88	59%	Elderly
1998	Villas on Bear Creek	NRH	240	180	75%	Elderly
1999	Homes of Parker Commons	Fort Worth	168	126	75%	General
1999	Park Vista Townhomes	Watauga	222	166	75%	General
2000	Eagle Lake Gardens	Azle	60	59	98%	General
2000	Sycamore Pointe Townhomes	Fort Worth	168	126	75%	General
07/19/01	Cobb Park Townhomes	Fort Worth	172	172	100%	General
07/31/01	Residences of Diamond Hill, The	Fort Worth	204	121	59%	General
07/31/01	Cedar Point Apartments	Mansfield	176	176	100%	General
07/31/01	Oak Timbers-White Settlement	White Settlement	104	104	100%	Elderly
08/21/01	Meridian, The	Fort Worth	280	280	100%	General
08/21/01	Wildwood Branch	Fort Worth	250	250	100%	General
04/11/02	Overton Park Townhomes	Fort Worth	216	216	100%	General
07/29/02	Continental Terrace Apartments	Fort Worth	200	200	100%	General
08/08/02	Shady Oaks Manor	Fort Worth	138	138	100%	General

10/10/02	Iron Wood Ranch Townhomes	Fort Worth	280	280	100%	General
10/10/02	Evergreen at Hulen Bend Apartments	Fort Worth	237	237	100%	Elderly
01/08/03	The Park @ Sycamore School Apartments	Fort Worth	216	216	100%	General
05/15/03	Sycamore Center Villas Apartments	Fort Worth	280	280	100%	General
06/12/03	Alameda Villas	Fort Worth	192	192	100%	General
06/25/03	Timber Oaks Apartments	Grand Prairie	264	264	100%	General
01/13/04	Blue Lake at Marine Creek Apartments	Fort Worth	186	186	100%	General
07/17/04	Post Oak East Apartments	Euless	246	246	100%	General
07/28/04	Villas of Forest Hill	Forest Hill	100	78	78%	Elderly
07/28/04	Samaritan House	Fort Worth	126	126	100%	General
07/28/04	Oak Timbers-White Settlement II	White Settlement	100	80	80%	Elderly
08/19/04	Aventine Tarrant Parkway Apartments	Fort Worth	240	240	100%	General
12/13/04	Worthington Point Apartments	Fort Worth	248	248	100%	General
12/13/04	Evergreen at Keller Senior Apartment	Keller	250	250	100%	Elderly
06/27/05	Prairie Ranch Apartments	Grand Prairie	176	176	100%	General
07/27/05	Samuel's Place	Fort Worth	36	36	100%	General
07/27/05	Cambridge Courts	Fort Worth	330	330	100%	General
07/27/05	Oak Timbers-Fort Worth South	Fort Worth	168	160	95%	Elderly
09/16/05	Providence at Marine Creek	Fort Worth	252	252	100%	General & Elderly
12/18/05	Cobblestone Manor Senior Community	Fort Worth	220	180	82%	Elderly
3/20/2006	Linbergh Parc Senior Apartments	Fort Worth	196	196	100%	Elderly
06/09/06	The Residences at Sunset Pointe	Fort Worth	224	224	100%	General
7/28/2006	Sphinx at Alsbury Villas	Burleson	150	143	95%	General
7/28/2006	Oak Timbers-Seminary	Fort Worth	128	123	96%	Elderly
7/28/2006	Candletree Apartments	Fort Worth	216	216	100%	General
7/28/2006	Enclave at Parkview Apts.	Fort Worth	144	144	100%	General
7/28/2006	Hanratty Place Apartments	Fort Worth	32	32	100%	General
8/30/2006	Village Creek	Fort Worth	252	252	100%	General
03/20/07	Amelia Parc Senior Apartments	Fort Worth	196	196	100%	Elderly
04/12/07	Home Towne at Matador Ranch	Fort Worth	198	198	100%	Elderly
07/30/07	Residences at Eastland	Fort Worth	146	140	96%	General
07/30/07	Jeremiah Seniors	Hurst	135	135	100%	Elderly
08/23/07	Peppertree Acres Apartments	Fort Worth	148	148	100%	General
7/31/08	St. Charles Place	Crowley	52	52	100%	General
7/31/08	Wind River	Fort Worth	168	168	100%	General
7/31/08	Heritage Park Vista	Fort Worth	140	135	96%	Elderly
7/31/08	Buttercup Place Apartments	Fort Worth	92	92	100%	General

11/26/2008	Mill Stone Apts.	Fort Worth	144	144	100%	General
11/26/2008	Four Seasons at Clear Creek	Fort Worth	96	92	96%	General
04/23/09	Woodmont Apartments	Fort Worth	252	252	100%	General
7/30/2009	Lincoln Terrace	Fort Worth	72	72	100%	General
07/29/10	Race Street Lofts	Fort Worth	36	36	100%	General
07/29/10	Prince Hall Gardens	Fort Worth	100	100	100%	General
09/09/10	Terrell Homes I	Fort Worth	54	54	100%	General
09/09/10	Sedona Village	Fort Worth	172	172	100%	Elderly
07/28/11	Bluebonnet Village / Primrose Park	Bedford	104	103	99%	Elderly
07/28/11	Pilgrim Valley Manor	Fort Worth	168	168	100%	General
07/26/12	The Reserve at Western Center	Fort Worth	120	120	100%	General
07/26/12	Harmon Villas	Fort Worth	150	150	100%	General
07/25/13	Reserve at McAlister	Fort Worth	124	112	90%	Elderly
01/23/14	Decatur-Angle Apartments	Fort Worth	302	302	100%	General
06/26/14	Hunter Plaza Apartments	Fort Worth	164	115	70%	General
07/31/14	Avondale Apartments	Fort Worth	160	144	90%	General
07/31/14	Mariposa Apartment Homes at Spring Hollow	Saginaw	194	140	72%	Elderly
07/30/15	Renaissance Heights	Fort Worth	140	119	85%	General
07/30/15	Villas at Boston Heights	Benbrook	144	130	90%	General
07/30/15	Gala at Oak Crest Estates	Eules	120	113	94%	Elderly
07/30/15	Kennedale Seniors	Kennedale	136	123	90%	Elderly
09/03/15	Reserve at Quebec	Fort Worth	296	280	95%	General
04/28/16	Stallion Pointe	Fort Worth	264	239	91%	General
06/16/16	Sansom Pointe Senior	Sansom Park	216	216	100%	Elderly Limitation
07/14/16	Sansom Ridge	Sansom Park	100	100	100%	General
07/28/16	Mercantile Apartments	Fort Worth	324	311	96%	General
07/28/16	The Standard at Boswell Marketplace	Fort Worth	128	118	92%	General
07/28/16	Avondale Farms Seniors	Fort Worth	121	109	90%	Elderly Limitation
07/28/16	HARMON SENIOR VILLAS	Fort Worth	160	144	90%	Elderly Preference
10/13/16	Broadmoor Apartments	Fort Worth	324	309	95%	General
12/15/16	Alton Park	Fort Worth	195	185	95%	General
05/25/17	Campus Apartments	Fort Worth	224	212	95%	General
05/25/17	Alton Park	Fort Worth	195	185	95%	General

07/27/17	The Vineyard on Lancaster	Fort Worth	104	98	94%	Supportive Housing
07/27/17	Mistletoe Station	Fort Worth	78	74	95%	General
07/27/17	Palladium Fort Worth	Fort Worth	150	92	61%	General
07/27/17	Sphinx at Sierra Vista Senior Villas	Fort Worth	272	272	100%	Elderly Limitation
07/27/17	Provision at North Valentine	Hurst	120	96	80%	General
07/27/17	Pioneer Place	Mansfield	135	135	100%	Elderly Limitation
09/07/17	Casa Inc	Fort Worth	200	199	100%	Elderly Preference

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Zip Code	0 BDRM	1 BDRM	2 BDRM	3 BDRM	4 BDRM	5 BDRM	6 BDRM
75022	\$990	\$1,188	\$1,458	\$1,953	\$2,502	\$2,877	\$3,309
75028	\$990	\$1,188	\$1,458	\$1,953	\$2,502	\$2,877	\$3,309
75050	\$738	\$847	\$1,070	\$1,314	\$1,870	\$2,151	\$2,434
75051	\$660	\$780	\$970	\$1,300	\$1,670	\$1,921	\$2,209
75052	\$738	\$864	\$1,071	\$1,472	\$1,872	\$2,153	\$2,464
75053	\$710	\$840	\$1,040	\$1,410	\$1,810	\$2,082	\$2,154
75054	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
75261	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76006	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,452
76008	\$945	\$1,080	\$1,350	\$1,863	\$2,376	\$2,732	\$3,142
76009	\$700	\$790	\$1,000	\$1,370	\$1,750	\$2,013	\$2,083
76012	\$720	\$820	\$1,030	\$1,410	\$1,800	\$2,070	\$2,142
76020	\$738	\$840	\$1,060	\$1,460	\$1,850	\$2,128	\$2,434
76021	\$756	\$855	\$1,080	\$1,485	\$1,890	\$2,174	\$2,500
76022	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,434
76023	\$670	\$740	\$970	\$1,220	\$1,530	\$1,760	\$1,821
76028	\$792	\$900	\$1,134	\$1,557	\$1,989	\$2,287	\$2,630
76031	\$640	\$730	\$920	\$1,270	\$1,620	\$1,863	\$1,928
76033	\$680	\$780	\$980	\$1,340	\$1,710	\$1,967	\$2,035
76034	\$990	\$1,134	\$1,422	\$1,962	\$2,502	\$2,877	\$3,309
76035	\$700	\$810	\$1,010	\$1,400	\$1,770	\$2,036	\$2,107
76036	\$801	\$909	\$1,143	\$1,575	\$2,016	\$2,318	\$2,666
76039	\$846	\$963	\$1,206	\$1,665	\$2,124	\$2,443	\$2,809
76040	\$710	\$810	\$1,020	\$1,400	\$1,780	\$2,047	\$2,354
76044	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,434
76049	\$710	\$840	\$1,030	\$1,440	\$1,780	\$2,047	\$2,119
76050	\$590	\$670	\$840	\$1,160	\$1,480	\$1,702	\$1,762
76051	\$855	\$972	\$1,224	\$1,683	\$2,142	\$2,463	\$2,833
76052	\$990	\$1,125	\$1,413	\$1,944	\$2,466	\$2,836	\$3,261
76053	\$670	\$760	\$960	\$1,320	\$1,680	\$1,932	\$2,222
76054	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76058	\$720	\$830	\$1,040	\$1,430	\$1,820	\$2,093	\$2,166
76059	\$650	\$740	\$930	\$1,290	\$1,640	\$1,886	\$1,952
76060	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,452
76061	\$730	\$830	\$1,040	\$1,430	\$1,830	\$2,105	\$2,178
76063	\$846	\$963	\$1,206	\$1,665	\$2,124	\$2,443	\$2,809
76066	\$620	\$700	\$880	\$1,210	\$1,550	\$1,783	\$1,845
76067	\$610	\$690	\$880	\$1,200	\$1,530	\$1,760	\$1,821
76070	\$600	\$690	\$880	\$1,200	\$1,530	\$1,760	\$1,821
76071	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$1,928

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76082	\$730	\$830	\$1,040	\$1,420	\$1,790	\$2,059	\$2,131
76086	\$738	\$847	\$1,070	\$1,480	\$1,872	\$2,153	\$2,434
76087	\$738	\$847	\$1,070	\$1,470	\$1,872	\$2,153	\$2,434
76088	\$660	\$760	\$950	\$1,310	\$1,670	\$1,921	\$1,988
76092	\$738	\$840	\$1,060	\$1,450	\$1,850	\$2,128	\$2,434
76093	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,434
76094	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76095	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76097	\$730	\$830	\$1,040	\$1,430	\$1,830	\$2,105	\$2,178
76098	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76099	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76101	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76102	\$882	\$1,008	\$1,269	\$1,746	\$2,223	\$2,556	\$2,940
76103	\$600	\$690	\$880	\$1,200	\$1,530	\$1,760	\$2,023
76104	\$600	\$690	\$880	\$1,200	\$1,530	\$1,760	\$2,023
76105	\$620	\$710	\$890	\$1,230	\$1,570	\$1,806	\$2,076
76106	\$670	\$770	\$960	\$1,330	\$1,690	\$1,944	\$2,235
76107	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,434
76108	\$730	\$840	\$1,050	\$1,450	\$1,840	\$2,116	\$2,433
76109	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,434
76110	\$650	\$740	\$930	\$1,280	\$1,630	\$1,875	\$2,156
76111	\$690	\$790	\$990	\$1,360	\$1,730	\$1,990	\$2,288
76112	\$690	\$790	\$990	\$1,360	\$1,740	\$2,001	\$2,301
76113	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76114	\$690	\$790	\$990	\$1,370	\$1,740	\$2,001	\$2,301
76115	\$630	\$720	\$900	\$1,240	\$1,590	\$1,829	\$2,103
76116	\$710	\$810	\$1,020	\$1,410	\$1,800	\$2,070	\$2,381
76117	\$620	\$710	\$890	\$1,220	\$1,560	\$1,794	\$2,063
76118	\$690	\$790	\$990	\$1,360	\$1,740	\$2,001	\$2,301
76119	\$630	\$710	\$900	\$1,240	\$1,580	\$1,817	\$2,090
76120	\$680	\$770	\$970	\$1,330	\$1,700	\$1,955	\$2,248
76121	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76123	\$990	\$1,134	\$1,422	\$1,962	\$2,502	\$2,877	\$3,309
76124	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76126	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,464
76127	\$963	\$1,098	\$1,377	\$1,899	\$2,421	\$2,784	\$3,202
76129	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76131	\$990	\$1,134	\$1,422	\$1,962	\$2,502	\$2,877	\$3,309
76132	\$756	\$864	\$1,080	\$1,485	\$1,899	\$2,184	\$2,511
76133	\$738	\$847	\$1,060	\$1,470	\$1,870	\$2,151	\$2,434
76134	\$730	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434

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76135	\$720	\$820	\$1,040	\$1,430	\$1,820	\$2,093	\$2,407
76137	\$855	\$972	\$1,224	\$1,692	\$2,160	\$2,484	\$2,857
76140	\$819	\$927	\$1,170	\$1,611	\$2,052	\$2,360	\$2,714
76147	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76148	\$909	\$1,035	\$1,305	\$1,791	\$2,286	\$2,629	\$3,023
76155	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,434
76161	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76162	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76163	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76164	\$600	\$690	\$880	\$1,200	\$1,530	\$1,760	\$2,023
76177	\$945	\$1,080	\$1,359	\$1,863	\$2,376	\$2,732	\$3,142
76179	\$864	\$981	\$1,233	\$1,701	\$2,169	\$2,494	\$2,869
76180	\$738	\$847	\$1,070	\$1,472	\$1,872	\$2,153	\$2,434
76182	\$864	\$981	\$1,233	\$1,701	\$2,160	\$2,484	\$2,857
76185	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434
76244	\$990	\$1,134	\$1,422	\$1,962	\$2,502	\$2,877	\$3,309
76248	\$864	\$981	\$1,242	\$1,710	\$2,178	\$2,505	\$2,880
76262	\$756	\$891	\$1,098	\$1,494	\$1,908	\$2,194	\$2,523
76462	\$630	\$740	\$920	\$1,280	\$1,590	\$1,829	\$1,892
76486	\$680	\$780	\$980	\$1,350	\$1,720	\$1,978	\$2,047
76487	\$720	\$810	\$1,030	\$1,390	\$1,720	\$1,978	\$2,047
76490	\$738	\$840	\$1,050	\$1,450	\$1,850	\$2,128	\$2,434

* Fort Worth Housing Solutions' jurisdiction includes all of Tarrant County with the exception of Arlington.

Appendix: American Housing Survey 2011 (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015)

Table 11A. Fort Worth MSA: Percent of All Housing Units with Critical Accessibility Features

Fort Worth MSA: All Housing Units	Level 1: Potentially Modifiable	Level 2: Livable	Level 3: Wheelchair Accessible	Sample Size	Weighted Counts
Total Sample	62.10%	2.83%	0.23%	3,707	856,236
Occupancy Status					
Renter-occupied	50.72%	2.21%	0.59%	1,265	294,966
Owner-occupied	70.52%	2.83%	0.00%	2,053	491,024
Vacant Unit	50.30%	6.75%	0.48%	369	63,448
Seasonal Unit	38.31%	0.00%	0.00%	20	6,798
Monthly Housing Cost (Median=989)					
Above Median (in sample)	72.36%	2.98%	0.38%	1,660	413,894
Below Median (in sample)	52.87%	2.17%	0.04%	1,658	372,096
Housing Price (Median=124500)					
Above Median (in sample)	73.60%	2.98%	0.00%	1,113	265,892
Below Median (in sample)	66.16%	3.06%	0.00%	1,113	256,683
Building Size					
1 Unit	69.22%	3.18%	0.26%	2,821	651,405
2-3 Units	47.65%	1.39%	0.00%	78	16,637
4-49 Units	37.91%	1.42%	0.08%	773	175,642
50+ Units	40.18%	5.10%	0.95%	35	12,552
Building Type					
House, apartment, flat	63.67%	2.84%	0.24%	3,525	815,362
Mobile home	28.22%	2.61%	0.00%	163	38,746
Other	68.66%	0.00%	0.00%	19	2,128
Building Age					
Built before 1920	13.51%	0.00%	0.00%	18	2,591
1920s	28.30%	0.00%	0.00%	27	5,413
1930s	27.26%	0.00%	0.00%	102	18,232
1940s	62.06%	11.11%	0.00%	178	34,463
1950s	50.28%	0.80%	0.00%	274	55,108
1960s	61.93%	4.88%	0.14%	368	95,027
1970s	67.91%	3.89%	0.00%	586	147,960
1980s	59.73%	2.77%	0.92%	879	206,798
1990s	66.49%	0.92%	0.00%	506	113,293
2000 or after	66.01%	1.51%	0.00%	769	177,351
Central City/Suburban Status					
Central Cities	59.72%	2.83%	0.39%	1,692	479,235
Suburbs	65.09%	2.82%	0.04%	2,015	377,001
Age of Residents					
Any Resident >= 65	74.11%	9.45%	1.22%	586	131,050
Any Resident < 18	65.06%	1.80%	0.00%	1,231	289,061
All Residents >= 18 and < 65	58.29%	0.81%	0.04%	1,553	375,723

Table 11A. Fort Worth MSA: Percent of All Housing Units with Critical Accessibility Features (continued)

Fort Worth MSA: All Housing Units	Level 1: Potentially Modifiable	Level 2: Livable	Level 3: Wheelchair Accessible	Sample Size	Weighted Counts
Household Composition					
Elderly, Living Alone	68.31%	13.63%	2.57%	263	61,183
Other	62.76%	1.67%	0.02%	3,055	724,807
Race/Ethnicity					
White (Non-Hisp.)	68.60%	3.37%	0.36%	1,948	467,684
Black (Non-Hisp.)	52.77%	1.46%	0.00%	470	106,291
Asian (Non-Hisp.)	44.08%	0.91%	0.00%	124	28,326
Hispanic of Any Race	59.43%	1.57%	0.00%	734	170,841
Immigration Status of Householder					
Native, US Citizen	64.58%	3.05%	0.26%	2,721	656,780
Foreign-Born, US Citizen	53.78%	0.71%	0.00%	240	57,383
Foreign-Born, Non-US Citizen	58.16%	0.05%	0.00%	357	71,827
Education					
Non-High School Graduate	52.77%	2.31%	0.00%	566	122,112
High School Graduate	53.42%	0.94%	0.08%	728	163,926
Some College, No Bachelor's	65.40%	3.55%	0.59%	1,067	266,393
Bachelor's and Above	72.82%	2.81%	0.00%	957	233,559
Income Limits					
Very Low Income	53.30%	3.06%	0.06%	1,014	228,978
Low Income	64.47%	4.67%	0.10%	620	151,435
Moderate Income	61.47%	1.54%	0.00%	566	124,709
Higher Income	71.11%	1.59%	0.51%	1,118	280,868
Low Income	64.38%	4.66%	0.10%	620	151,435
HUD-Assisted Households	37.26%	7.01%	0.86%	94	15,833
Very Low-Income Renters	48.79%	1.65%	0.10%	584	137,618
Worst Case Needs	39.23%	0.77%	0.00%	95	19,057