# State of Texas
# Analysis of Impediments to Fair Housing Choice
# 2024

Prepared by:
Texas Department of Housing and Community Affairs
Texas General Land Office
Texas Department of Agriculture
Texas Department of State Health Services
Texas Workforce Commission – Civil Rights Division

EQUAL HOUSING
OPPORTUNITY

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# Executive Summary

The Texas Department of Housing and Community Affairs (the Department) has produced this 2024 Analysis of Impediments to Fair Housing Choice (AI) in conformance with the Interim Housing Rule for HUD Community Planning and Development (CPD) funding recipients. The Department serves as the central coordinator of this document on behalf of all Texas state agencies which receive such CPD funds. More specific information on the member agencies and applicable CPD Programs can be found in Chapter 1, Introduction.

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

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

As part of this planning process, the State reviewed the 2019 AI, and then took an inventory of the actions it had taken to mitigate the identified impediments since 2019. By combining data analysis and public consultation with the work that was responsive to the 2019 AI, and a review of current Texas statute and administrative code, impediments were identified.

Chapter 1 introduces the partner agencies, covered CPD Programs, methodology for the AI, and the public input process utilized. The subsequent chapters look at where we are as a state through several lenses: through looking at a statewide overview of demographics and housing considerations (Chapter 2) and a regional analysis (Chapter 3); through reviewing statewide regulations and rules (Chapter 4); through discussing and describing actions that have been taken and are currently being undertaken to affirmatively further fair housing by the covered state agencies (Chapter 5); through performing a housing portfolio analysis of both regular and pandemic programs (Chapters 6 and 7); through a lending analysis (Chapter 9); and through an overview of fair housing trends and complaints and (Chapter 10). All of those chapters together lay the framework for the identification of statewide impediments. Chapter 8 provides a review

of specific considerations and actions which having been taken specifically as it relates to disaster recovery and response with CPD funds by the General Land Office (GLO).

As noted, it is only through identification of those factors that stymie housing choice that we can determine what steps can be taken to attempt to mitigate those impediments. In developing the specific impediments for this AI, the Department considered past impediments and whether they continued to exist, the trends and observations seen through the earlier chapters in this document, as well as new input received during early consultations. Comment received during the fall 2023 early consultation period is covered in detail in both Chapter 6 and Chapter 12. Because the issues addressed in past AIs were broad and pervasive challenges, and continued to be reiterated and reaffirmed across many input sessions, the state does not consider the past five impediments to be resolved. However, based on newer insights and input those impediment statements have been revised to make them as current and relevant as possible. Also, the state has identified an additional impediment to total six that it will strive to address during the next five years. Those impediments, listed in summary form below, are expanded upon in Chapter 11.

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

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

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

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

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

**Impediment No. 6:** Unexpected or otherwise unpredictable events or economic shocks, and resulting recessions, have an outsized impact on certain protected groups or class members.

Finally, in Chapter 12, Conclusions and Recommendations are presented laying out the ways in which the state agencies with HUD CPD programs will use those resources to address solutions within their control with the CPD funds available. The AI works from the guiding principle of seeking to identify impediments to fair housing choice and to identify specific actionable steps that can be taken to effect meaningful changes aimed at mitigating the barriers to fair housing choice. The recommendations to address the identified impediments, listed in summary form below, are expanded upon with proposed action steps in Chapter 12.

**Recommended Actions to Combat the Effects of Historical Housing Discrimination**

**Recommended Actions to Remediate Ongoing Housing Discrimination**

**Recommended Actions to Increase the Amount of Information Available to Low-Income Texans about Their Rights and Access to Affordable Housing Programs**

# Chapter 1 - Introduction

The U.S. Department of Housing and Urban Development (HUD) formerly required the development of an Analysis of Impediments to Fair Housing Choice (AI) in accordance with their 2015 Affirmatively Furthering Fair Housing (AFFH) rule. This obligation generated from the Fair Housing Act of 1968, which gave HUD a lead role in administering the Fair Housing Act. An AI was intended for HUD Community Planning and Development (CPD) funding recipients. The Texas Department of Housing and Community Affairs (TDHCA) operates several CPD-funded programs to include the HOME Investment Partnerships Program (HOME), the National Housing Trust Fund (NHTF) and the Emergency Solutions Grants (ESG) programs. Three other state agencies, the Texas General Land Office (GLO), Texas Department of State Health Services (DSHS) and Texas Department of Agriculture (TDA) are also recipients of CPD funds and TDHCA leads the AI development on behalf of these Texas state agencies. The Texas Workforce Commission, Civil Rights Division (TWC-CRD) also participated in the process, providing training, technical assistance and data on fair housing complaints. An AI was required by HUD to be completed as a component of the five-year Consolidated Planning process; TDHCA last prepared an AI in the summer of 2019.

On January 14, 2020, HUD published a proposed rule to repeal and replace the 2015 AFFH rule. By August 7 of that same year, HUD abandoned that proposed rulemaking and instead promulgated what was called the Preserving Community and Neighborhood Choice (PCNC) final rule. PCNC not only repealed the 2015 AFFH rule, but eliminated the regulatory framework that preexisted that rule. That decision removed any obligation by program participants to undertake any type of fair housing planning, and also meant HUD had no mechanism to assist jurisdictions that wished to continue such activity. However, by July 31, 2021, HUD repealed the PCNC rule and published what is called the Interim Final Rule (IFR) which suspended that previous rule which HUD felt was inconsistent with the AFFH statutory mandate.

On February 9, 2023, HUD announced a new proposed AFFH rule which would incorporate much of the framework of the previous 2015 AFFH rule. This proposed new rule sought to streamline the required fair housing analysis for local communities, states, and public housing agencies. The proposed rule also suggested the AI be re-branded under the name Equity Plan. HUD accepted comment on this proposed new rule through mid-April 2023, yet since that time there has been no further update from HUD on the status of this proposed new rule and proposed Equity Plan. Therefore, CPD recipients now still operate under the July 31, 2021, AFFH IFR because an interim final rule remains in effect during any proposed rulemaking process. The IFR does not require program participants to undertake any specific type of fair housing planning but leaves it open for participant jurisdictions to experiment with methods of fair housing planning that best enable them to satisfy their obligation to AFFH. This means that the state has the flexibility to move forward on its AI using any approach it feels is best while still adhering to HUD's timeline.

The state's next 5-year Consolidated Plan is due to HUD on July 18, 2025, and the fair housing planning document is due by July 18, 2024, or 365 days before the submission of the Consolidated Plan. HUD guidance on this planning document suggests that participants could create or update an AI, create or update an Assessment of Fair Housing (AFH) or instead participants could state they are meeting their requirements in a certification document. The State of Texas is fulfilling their fair housing obligation through the completion of an updated AI that covers policies, practices, and procedures affecting housing choice. All chapters of the previous 2019 document have been revised keeping in mind several key aspects and goals which HUD put forth in their early 2023 proposed rule. Due to this approach, this 2024 AI has a more streamlined, less structured format. In the past five years since the last AI was published there have been advances in available software and digital tools which enhance connectivity. Staff have chosen to replace most static charts and tables from the previous 2019 document with interactive charts, graphs, and maps using Tableau software. The intent of visualizing this geographic information is to help the reader more quickly and easily derive insights from the data and provide a more useful, interactive online document. Along with this approach is the statewide effort to move from printed material to online documents. Also, in accordance with its Citizen Participation Process identified in the state's Consolidated Plan, in the fall of 2023 staff conducted outreach and consultations in order to garner early input for this updated AI. Outreach included TDHCA email blasts, announcements made at external TDHCA meetings, and solicitation letters to stakeholders and advocates. This outreach outlined the basics of the AI document, provided a link to view both the 2019 AI and the state's 5-Year Consolidated Plan and invited written comment by one of the following four ways:

- Using an early input form
- Using the attached QR code to access an early input form
- Emailing: fair.housing@tdhca.texas.gov
- Mailing to the following address:

TDHCA Fair Housing
c/o Housing Resource Center
P.O. BOX 13941
Austin, TX 78711-3941

Staff utilized feedback from the outreach and consultation period and incorporated new analysis based on this feedback. Most of this new analysis can be found in Chapter 6, which informs the recommendations in Chapter 12.

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

The State of Texas administers its CPD program funds received from HUD across four state agencies: the Texas Department of Housing and Community Affairs (TDHCA), the Texas

Department of Agriculture (TDA), the Texas Department of State Health Services (DSHS), and the General Land Office (GLO). This AI is a document reflective of all of those agencies efforts and activities as it relates to their CPD programs. Following is a list of the permanent CPD programs administered by the State.

## HOME Investment Partnerships Program - TDHCA

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

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

## Emergency Solutions Grants Program (ESG) - TDHCA

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

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

## National Housing Trust Fund (NHTF) - TDHCA

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

## Community Development Block Grant Program – Texas Department of Agriculture (TDA)

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

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

The operation of the Colonia Self Help Centers (SHCs) is funded through a 2.5% set-aside from the CDBG Program at TDA. There are eight SHCs in the following counties: Cameron/Willacy, El

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

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

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

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

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

## Low Income Housing Tax Credit

The LIHTC or HTC Program receives authority from the U.S. Department of the Treasury to provide tax credits to nonprofit and for-profit developers. The tax credits are sold to investors, creating equity that decreases the need to incur and service debt; the equity generated through that sale allows the property owners to lease units to low income households at reduced rents. The targeted beneficiaries of the program are very low-income and extremely low-income families at or below 80% of the AMFI, with 60% AMFI being the most common restriction. The HTC Program was created by the Tax Reform Act of 1986 and is governed by the Internal Revenue Code of 1986 (Code), as amended, 26 USC §42. There are two different housing tax credit programs: the 9% Competitive HTC Program and the 4% Non-competitive HTC Program. TDHCA is the only entity in the state with the authority to allocate HTCs under these programs. As required by the Code and Texas statute, TDHCA develops the HTC Program Qualified Allocation Plan (QAP), which establishes the scoring process and threshold requirements relating to an allocation of housing tax credits. Pursuant to Tex. Gov't Code §2306.6724(c), the Governor shall approve, reject, or modify and approve the Board adopted QAP not later than December 1 of each year.

## Early Consultation, and Public Participation

The four state agencies in Texas that receive HUD CPD funds - TDHCA, TDA, GLO, and DSHS - collaborated on the creation of the Draft 2024 Analysis of Impediments to Fair Housing Choice. TDHCA takes the lead role in collaborating on the year-round coordination for fair housing among the agencies, and in drafting the AI. The Texas Workforce Commission, Civil Rights Division (TWC-CRD) also participates in the process, providing technical assistance and data on fair housing complaints.

In compliance with its Citizen Participation Process identified in its Consolidated Plan, the State offered multiple opportunities for consultation in order to garner input for the initial draft Analysis of Impediments. E-mail blasts were used to contact local officials, advocacy groups, and stakeholder groups inviting them to provide input on fair housing issues in their community for use in the draft Analysis of Impediments. A Google form was used to ask stakeholders to provide input. Accommodations were available to individuals requiring auxiliary aids, services, or sign language interpretation to participate in consultation, if requested

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

Opportunities for consultation were provided at regularly-scheduled meetings with specific stakeholder groups in order to reach as many groups as possible. These consultations included

meetings with the Texas Interagency Council for the Homeless (TICH), and the Housing and Health Services Coordination Council (HHSCC).

Any and all input for the AI was accepted during the online consultation period. The robust early input and participation period provided great insight in the State of Texas' identification of impediments and in its ability to assess progress made toward previously identified impediments to fair housing choice.

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

At the TDHCA Board meeting of February 6, 2024, the Draft AI was given approval to be released for public comment in April. The Draft AI was posted to the TDHCA website and notification of this posting announced by email distribution to over 30,000 email addresses.

In accordance with the State's HUD approved Citizen Participation Plan, the public comment period for the Draft AI was open from April 3, 2024, to May 3, 2024. Notification of the public comment period and public hearings was announced by email distribution and published in the *Texas Register* on March 29, 2024. Four public hearings were held. Notification of the public hearings were also released by TDHCA's X (Twitter) and Facebook accounts and posted on the TDHCA Events Calendar and the TDHCA Public Comment Center webpages.

TDHCA appreciates the careful review of the draft 2024 AI and the comments received.

**1. Scope - Housing**

One commenter stated that investment in housing can alleviate poverty and suggested that TDHCA should invest in affordable housing to address root causes of poverty in Region 11.

*(Comment made by come.dream.come.build (cdcb))*

> **Department Response:** The geographic distribution of funding is an issue that is unique to Texas, due to its large physical size and population. Because resources are finite, decisions that alter funding geographically will necessarily create areas with more or fewer resources.  Access to more resources to invest in any or all regions than TDHCA already has is not within the scope of the AI. Parties interested in this topic and in altering the geographic distribution of funds can participate in the Regional Allocation Formula and Qualified Allocation Plan processes. No changes to the Analysis of Impediments have been made as a result of this comment.

One commenter noted that TDHCA should prioritize housing preservation in Region 11.

*(Comment made by cdcb)*

> **Department Response:** As with geographic distribution of funds, distributing resources across new construction and preservation is also a balance of limited resources. Because this comment is specific to Region 11, TDHCA strongly recommends that the commenter and other interested parties utilize the Regional Allocation Formula and Qualified Allocation Plan processes to address this concern. No changes to the Analysis of Impediments have been made as a result of this comment.

Five commenters suggested that the AI should include a recommendation to increase funding for deeply affordable housing, and to increases state funding for emergency shelter, colonia self-help centers and vouchers. Two other commenters indicated that TDHCA should advocate for additional funds for TRR and/or eviction prevention, and TDHCA should amend the AI to include recommending additional emergency rental assistance.

*(Comment made by Joy Davis, Christopher Jenkins,  NAACP Legal Defense Fund, AARP Texas and Texas Housers)*

> **Department Response:** The allocation of state funds is under the sole purview of the Texas Legislature. The AI does not include requests for additional funds as executive agencies do not act as advocates, and are prohibited from lobbying the Legislature. Commenters that would like to see action from the Legislature should engage in the legislative process. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter mentioned that the state should create a permanent home repair and modification program.

*(Comment made by AARP TX )*

> **Department Response:** TDHCA does have two permanent home repair and modification programs: 1) The Amy Young Barrier Removal program is designed to assist households with members who have a disability remove physical barriers in the home along an allowance for removal of some health and safety barriers. 2) The Homeowner Reconstruction Assistance program, while not  specific to only repair, can be used to help reconstruct owner occupied housing or to replace manufactured housing with site-built housing. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter suggested that the AI include a recommendation to encourage universal design.

*(Comment made by AARP TX)*

> **Department Response:** All multifamily housing funded by TDHCA since 2002 is required to meet construction standards of Section 504 of the Rehabilitation Act. All awards since

2014 must comply with the 2010 ADA standards with HUD's 11 exceptions. Additionally, all new multifamily construction is required to abide by the 2012 Texas Accessibility Standards. Furthermore, the QAP requires multifamily developments originally constructed on or after 1991,that are not subject to the Fair Housing Act Design and Construction Standards, to comply with vistability requirements. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter stated that the AI should recommend increasing the role of non-traditional housing to increase affordable housing stock such as Accessory Dwelling Units and manufactured housing.

*(Comment made by AARP TX)*

**Department Response:** Some TDHCA single family activities already allow for the use of funds to place manufactured housing units. Additionally, TDHCA is committed to seeking out additional federal resources, when available, to pursue more assistance in Texas including non-traditional housing. TDHCA will add a recommendation to look into how single family funds could be used in the production of accessory dwelling units.

One commenter indicated that TDHCA should require rehabilitation developments at sites with a history of lead paint, rat or roach infestations to provide TDHCA with detailed plans on how the developer plans to eradicate or remove rats, lead, roaches.

*(Comment made by NAACP Legal Defense Fund)*

**Department Response:** TDHCA agrees that the identified items present a health and safety concern. Because these comments focus only on properties that are being considered for awards for rehabilitation, staff suggest that the commenter utilize the QAP process to make sure that remediation plans in applications involving rehabilitation are part of the application process. As a result of this comment, TDHCA is including a new recommendation to consider adding an item in the QAP for rehabilitation applications to include a remediation plan for rehabilitation where the site has a reported history of lead paint or insect or rodent infestations.

**2. Scope - Colonias**

Two commenters indicated that TDHCA should improve the quality of Colonia Self Help Centers by seeking input more regularly from residents to respond to the shifting needs of colonia communities.

*(Comment made by Christopher Jenkins and cdcb)*

> **Department Response:** TDHCA recommends that those utilizing self-help centers and those advocating for those households attend board meetings and submit written comment that explicitly describes what specific changes are being sought. Because there are no references to specific changes in this comment, no changes were made to the document.

One commenter suggested that TDHCA should increase the capacity of Colonia Self Help Centers to meet growing and shifting needs of colonias.

*(Comment made by cdcb)*

> **Department Response:** Without additional funding for the CDBG program, the size of the 2.5% colonia set aside which funds the Colonia Self Help Centers does not provide for funds to increase capacity. No changes to the Analysis of Impediments have been made as a result of these comments.

### 3. Scope - Public Comment Process

One commenter recommended that the AI process should gather more public comment by gathering input at LIHTC properties by using surveys and meetings at those properties.

*(Comment made by cdcb and Texas Housers)*

> **Department Response:** TDHCA sought input by sending invitations to comment to approximately 30,000 email addresses using the TDHCA email lists. Currently, there is a recommendation in Chapter 12 that proposes that the Tenants Rights and Resources Guide include information on how to sign up for TDHCA's mailing lists. Additionally, TDHCA conducts, at the direction of the Legislative Budget Board (LBB), customer service surveys. TDHCA will consider investigating the use of regular customer service surveys to ask for input on fair housing planning throughout the 5-year planning cycle. No changes to the document have been made as a result of this comment.

Multiple commenters felt that the AI input process was limited, and that the lack of in person meetings reduced overall input. One of these commenters also noted that the process was too passive and not affirmative.

*(Comment made by Texas Appleseed, Disability Rights Texas and Texas Housers and cdcb)*

> **Department Response:** TDHCA sent invitations to provide both Early Consultation and public comment for the draft 2024 AI to approximately 30,000 email addresses using the TDHCA email lists. TDHCA and TDA reached out to their respective lists of advocacy and subrecipient groups, and individuals, in order to invite them to participate in the early

input process. TDHCA believed that this invitation would also be shared by those groups with their constituents so that they too could participate in the process. TDHCA asks that stakeholder groups advertise comment opportunities to their constituents and inform them about the purpose of the comment period in order to maximize awareness of and participation in comment opportunities.  The 2024 comment period elicited three times as many unique commenters compared to the 2019 document. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter felt that the AI did not have a detailed enough Executive Summary and that it did not speak to low-income Texans.

*(Comment made by Texas Housers)*

**Department Response:** Staff will expand the summary in order to provide more details about the recommendations.

One commenter stated that the 2024 AI relies frequently on input provided from the 2019 AI and that they felt this was misleading.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA staff did selectively include consultation and comment from the previous AI, as some of those items were still salient. This was not intended to be misleading or imply that the comments were made in 2024. No changes to the Analysis of Impediments have been made as a result of these comments.

**4. Scope - List of Impediments**

Multiple commenters mentioned that evictions are not considered an impediment in the AI and TDHCA should consider implementing rules that require 30-day notice to vacate at LIHTC properties.

*(Comment made by AARP Texas, Disability Rights Texas, NAACP Legal Defense Fund and Texas Housers)*

**Department Response:** While evictions per se are not listed as an impediment, the document does discuss evictions and staff believe that the effect evictions have is covered by other listed impediments, such as the newly included Impediment 6: Unexpected or otherwise unpredictable events or economic shocks. Properties that TDHCA monitors are required to provide notices to indicate a lawful reason for either lease termination or lease non-renewal. No changes to the Analysis of Impediments have been made as a result of these comments. Commenters are encouraged to make comments on the applicable compliance and program rules.

One commenter noted that the identified impediments only address housing programs and that analysis for programs governed by TDA or GLO are not included or are limited.

*(Comment made by TX Appleseed and Christopher Jenkins)*

**Department Response:** The General Land Office has no additional comment to add. The Texas Department of Agriculture notes that without knowing what specific analysis is lacking or missing, it is not possible to add new analysis or bolster existing analyses. No changes to the Analysis of Impediments have been made as a result of these comments.

## 5. Scope - Source of Income Discrimination

Multiple commenters indicated that source of income discrimination and HCV discrimination are not discussed in the AI.

*(Comment made by Bernistine Williams, AARP Texas, Disability Rights Texas, Texas Housers)*

**Department Response:** The duty to affirmatively further fair housing extends to agencies that receive federal funds. Source of income is not a protected class in either the federal or Texas Fair Housing Acts. The power to add source of income discrimination to the Texas Fair Housing Act rests with the Texas Legislature. As a result, the state did not identify source of income discrimination as an impediment. TDHCA has implemented rules for LIHTC and other multifamily housing that it monitors that bars properties from denying housing to solely based on the fact that they federal, state, or local government tenant based rental assistance, such as a Housing Choice Voucher. No changes to the Analysis of Impediments have been made as a result of these comments.

## 6. Scope - State Laws

One commenter notes that 88R HB 2127 preempts local protections and is not included in the AI.

*(Comment made by Disability Rights Texas)*

**Department Response:**  TDHCA and other agencies that receive funds do not have the jurisdiction to preempt or alter HB 2127. No changes to the Analysis of Impediments have been made as a result of these comments.

Two commenters stated that the AI fails to identify Texas laws that are an impediment to fair housing choice.

*(Comment made by Texas Housers and Disability Rights Texas)*

**Department Response:** The AI does not identify specific laws as impediments because the power to make law rests with the Texas Legislature and the power to interpret law rests with the Texas judiciary. Executive agencies do not act as advocates or lobbyists. No changes to the Analysis of Impediments have been made as a result of these comments.

**7. Scope - Impediment One: NIMBYism**

Multiple commenters indicated that the AI does not adequately address NIMBYism. Two commenters also noted that the AI does not adequately address the specific issue of exclusion of HTC properties by NIMBY groups, which leads to more segregated neighborhoods for non-senior properties.

*(Comment made by Sharon Underwood, Disability Rights Texas, NAACP Legal Defense Fund and Texas Housers)*

**Department Response:** Staff respectfully disagrees that NIMBYism in the AI is not well addressed, as the AI does continue to address NIMBYism. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter stated that the AI does not discuss local deregulation in the context of NIMBYism.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA, TDA, TWC, DSHA, and GLO do not have any jurisdiction over zoning. No changes to the Analysis of Impediments have been made as a result of these comments.

**8. Scope - Impediment Two: Guidance on Fair Housing Rights**

One commenter stated that the AI should use the Texas Organizing Project's 4 Housing Rights as a framework for the AI.

*(Comment made by Texas Housers)*

**Department Response:** No guidance from HUD on fair housing planning via the Affirmatively Furthering Fair Housing Rule was given, and the current rule is an Interim Final Rule (IFR). Due to IFR uncertainty, TDHCA felt the best action was to treat the 2024 AI as an update to the 2019 AI. No changes to the Analysis of Impediments have been made as a result of these comments.

**9. Scope - Impediment Three: Homeownership**

One commenter indicated that the AI fails to mention noteworthy barriers to accessing homeownership, and specifically mentions institutional homebuyers as an impediment.

*(Comment made by Texas Housers)*

> **Department Response:** The AI devotes an entire chapter to discussing homeownership, and also evaluates TDHCA's homeownership programs. None of the agencies tasked with the duty to affirmatively further fair housing have any jurisdiction over institutional homebuyers. The Office of the Governor has identified the issue of institutional homebuyers as a priority for the upcoming 89th Legislative Session. No changes to the Analysis of Impediments have been made as a result of these comments.

**10. Scope - Impediment Four: Inspections**

Multiple commenters had concerns regarding the quality and condition of properties and the physical inspection process.

*(Comment made by Disability Rights Texas, AARP, Texas Housers and NAACP Legal Defense Fund)*

> **Department Response:** It is anticipated that 10 TAC Chapter 10, Compliance Monitoring Rule, Subchapter F will be released for comment in the summer of 2024. This public comment period for this rule would be the appropriate forum to comment on any physical inspection concerns. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter suggested that TDHCA has allowed some poor property conditions after inspections, such as Bexar Creek.

*(Comment made by Texas Housers)*

> **Department Response:** As of May 3, 2024, TDHCA had only received one complaint about the property called Bexar Creek and this complaint was not about the physical condition of the property. TDHCA strongly recommends that parties aware of physical issues at properties TDHCA monitors be reported using the TDHCA complaint process. TDHCA had already scheduled Bexar Creek for an inspection by the time comment was received, and has reached out to San Antonio code enforcement to obtain additional reports. It is anticipated that 10 TAC Chapter 10, Compliance Monitoring Rule, Subchapter F will be released for comment in the summer of 2024. This public comment period for this rule would be the appropriate forum to comment on any physical inspection concerns. No changes to the Analysis of Impediments have been made as a result of these comments.

## 11. Scope - Disaster Recovery

One commenter indicated that disaster recovery is a disability issue.

*(Comment made by Disability Rights Texas)*

**Department Response:** While this comment primarily focuses on traditional disasters, Impediment 6 also recognizes that disasters and disruptive economic events have an outsized impact on protected groups, including people with disabilities. No changes to the Analysis of Impediments have been made as a result of these comments.

Multiple commenters indicated that the 2024 AI did not sufficiently address disaster recovery activities.

*(Comment made by Disability Rights Texas, Texas Housers, Harvey Forgotten Survivors Caucus, and Harris County Community Organizer Shirley Ronquillo)*

**Department Response:** The Texas General Land Office (GLO) appreciates your comments. The GLO, Houston, and Harris County have administered a number of programs whose mission is to assist homeowners and communities in rebuilding, relocating, and revitalizing for long term disaster recovery. All programs are assessed by what languages are most spoken by Limited English Proficiency persons in Texas and updates that list of languages using the most recent available data. All programs abide by this Language Assistance Plan and all applications, websites, assistance FAQ's and marketing materials are all available in the five most commonly spoken languages in the state, including but not limited to English, Spanish, Chinese, French, and Vietnamese. Bilingual case managers are available, and we rely on our vendor, Tetra Tech, for translation services as necessary.

Hurricane Harvey, with it wind speeds up to 150mph while dumping trillions of gallons of rain on the Houston and Texas Gulf Coast Communities, caused unprecedented devastation: more than $125 billion in damage affecting more than eight million people across the state of Texas. Harris County has made great progress. As to date, the Houston State-Run Homeowner Assistance Program (HAP) has 775 homes approved or under construction. 1,593 complete homes complete. The Houston City-Run Housing Assistance Program (HoAP) has had 777 applications approved, 283 homes completed, 494 homeowners reimbursed. The Multi Family Rental Program (MFRP) has 31 approved projects, 10 projects completed, 10 projects with construction completed, 11 under construction for a total of 3,572 approved units with 3,072 (86%) Low to Moderate Income (LMI) applicants served. The Small Rental Program (SRP) - 5 projects approved, 5 under construction, 0 projects complete, for a total of 31 approved units with 31 (100%) LMI.

On the Harris County side, the Harris County State-Run Homeowner Assistance Program (HAP) has 131 homes are approved or under construction. 375 are complete. The Harris

County Homeowner Assistance Program (HAP) has 125 homes completed. The Multifamily Program (Harvey 57M and 5B) has 12 constructions complete, 4 projects under construction, 1 project recently approved to begin construction and a total 2,754 units with 2,480 LMI.

**12. Scope – Criminal History Screening**

Multiple commenters stated that the use of criminal history screening can be a barrier to Fair Housing.

*(Comment made by Joy Davis, Disability Rights Texas, NAACP Legal Defense Fund and Texas Housers)*

**Department Response:** The agencies tasked with affirmatively furthering fair housing have limited ability to regulate criminal history screenings. For its part, TDHCA does provide technical assistance and make recommendations on criminal screenings at properties that it monitors, even though those recommendations are generally not binding. Since the 2019 AI was released, TDHCA rule updates have required properties to explicitly list what criminal screening findings would be disqualifying and what the lookback periods are for each offense or offense type. TDHCA has also made recommendations that screening criteria include language indicating that the property will look at mitigating factors in criminal backgrounds, in line with HUD's guidance on the topic. No changes to the Analysis of Impediments have been made as a result of these comments.

Commenters suggested that TDHCA should act to remove unnecessary screening criteria and/or bar all criminal screenings in HUD and LIHTC properties.

*(Comment made by by NAACP Legal Defense Fund and Texas Housers)*

**Department Response:** TDHCA provides technical assistance and recommends that properties only screen on attributes that the property manager finds are directly related to an applicant's ability to perform under the lease. No changes to the Analysis of Impediments have been made as a result of these comments.

**13. Scope - LIHTC**

Two commenters stated that TDHCA is trying to shift responsibility to advocacy groups when looking for service providers in LIHTC housing.

*(Comment made by Disability Rights Texas, Texas Housers)*

**Department Response:** TDHCA respectfully disagrees with the comment. Asking advocacy organizations to help find and connect households with service providers is not

shifting the responsibility, as TDHCA does not have a responsibility to find service providers for its properties. That responsibility lies with the property owners and applicants. TDHCA suggests that if advocacy groups want more high quality services at LIHTC properties, then those groups may have the expertise and local knowledge to help connect service providers to properties. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter indicated that the 2021 Interim Final Rule requires TDHCA to affirmatively further fair housing in the LIHTC program.

*(Comment made by Inclusive Communities Project)*

**Department Response:** The AI includes an analysis of LIHTC applications and recommendations related to scoring of LIHTC applications. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter stated that more than 90% of all LIHTC units since 2016 have been placed in census tracts with a population less than 50% White non-Hispanic.

*(Comment made by Inclusive Communities Project)*

**Department Response:** ICP's analysis shows that there have been 154 properties awarded in Dallas. TDHCA's Vacancy Clearinghouse shows that there are fewer than 140 TDHCA-monitored properties in Dallas. Additionally, the ICP analysis states that there have been 80 LIHTC awards from 2016-2023. TDHCA found less than half that number of awards in Dallas from 2016-2023 using the same data source as ICP. Overall, TDHCA disagrees with the statistical and legal conclusions reached in ICP's analysis, and it is established that the simple existence of a statistical difference is not prima facie proof of discrimination. No changes to the Analysis of Impediments have been made as a result of these comments.

Three commenters stated that the draft 2024 AI fails to examine the inequitable environmental conditions that impact LIHTC residents in racially and ethnically concentrated locations and recommends that the Environmental Justice Index be used.

*(Comment made by Inclusive Communities Project, Texas Housers, and NAACP Legal Defense Fund)*

**Department Response:** TDHCA reviewed the Environmental Justice Index data and documentation. The Environmental Justice Index technical documentation states that the EJI should not be used as a definitive tool for labeling Environmental Justice Communities,

to represent risk or exposure for a community or to tell if individuals are at risk in that community. Accordingly, TDHCA does not believe that the EJI should be used as a tool to evaluate applications for Low Income Housing Tax Credits (LIHTC). No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter notes that the AI deliberately omits meaningful actions to address segregation in the LIHTC program, ignoring thousands of LIHTC units that are already in areas of minority concentration.

*(Comment made by Inclusive Communities Project)*

**Department Response:** As the commenter notes, recommendations must be actions. There are several LIHTC-specific recommendations that, when taken together, do address disparities. TDHCA also disagrees that the LIHTC program was omitted from the AFFH analysis (commenter cites page 184). The 2024 draft AI examines the LIHTC portfolio, which this commenter acknowledges, and the document never states that the duty to affirmatively further fair housing does not extend to the LIHTC program. Furthermore, almost no other program mentioned in the 2024 AI draft received as much analysis as the LIHTC program. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter stated TDHCA should consider regularly surveying tenants at LIHTC properties.

*(Comment made by Texas Housers)*

**Department Response:** The AI already makes this recommendation, but staff will expand the language to read "Investigate opportunities to partner with state research universities to assess the impacts and trends of the State's multifamily programs, including options to regularly survey tenants in TDHCA-monitored properties."

One commenter noted that the AI should include a short description of the LIHTC program in Chapter 1.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA has added a description of the LIHTC program to Chapter 1 of the 2024 AI.

A commenter suggested that the AI should take the extra step to identify specific geographic areas of concern.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA already contemplates this, as it related to LIHTC by use of scoring and tiebreakers in the QAP. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter said that the state should reevaluate the role local approval plays in the HTC application process, including requirement surrounding letters from State Representatives.

*(Comment made by Texas Housers)*

**Department Response:** The representative letter requirement is set forth in Texas statute.  Executive agencies are not permitted to act as advocates or lobbyists to the Legislature. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter indicated the AI failed to include older housing when considering housing choice, using only post 2018 LIHTC award cycles does not show the full array of housing choice.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA specifically uses only recent LIHTC award cycles because, as the commenter rightly notes, TDHCA is not able to undo these past awards. No changes to the Analysis of Impediments have been made as a result of these comments.

One comment supported TDHCA's recommendation to consider gentrification and displacement in awarding LIHTC properties, but are concerned about implementation. This commenter suggests that TDHCA should specifically use the methodology used in the Uprooted report from researchers at the University of Texas.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA recommends that the commenter utilize the QAP roundtable process to suggest specific methodologies, including the Uprooted report, as alternatives to identifying neighborhoods at risk of gentrification. TDHCA has added a mention of the Uprooted report methodology to the recommendation as a possible option to consider.

One commenter stated the AI showed that 4% LIHTC properties were disproportionately placed in higher poverty, racially concentrated areas.

*(Comment made by NAACP Legal Defense Fund)*

**Department Response:** TDHCA appreciates the comment but disagrees with the interpretation given by the commenter. The 4% tax credit program provides developers

with less financial incentive than the 9% program. These awards are also usually non-competitive, meaning the vast majority of applications that meet threshold requirements are funded. If additional restrictions are placed on the program, it would most likely reduce the number of units either rehabilitated or placed-in-service rather than change their geographic distribution. No changes to the Analysis of Impediments have been made as a result of these comments.

## 14. Scope - Racial Segregation

One commenter said the AI fails to identify existing patterns of racial segregation and does not use correct measures of segregation or integration.

*(Comment made by Inclusive Communities Project)*

**Department Response:** TDHCA appreciates this comment but disagrees. The AI utilized two different measures of racial segregation, including R/ECAPs and a diversity index. Maps of both of those are available in the 2024 AI. TDHCA does not believe that there is value in analyzing LIHTC applications and awards that are more than 5 years old as they are not indicative of current policy, and there is no meaningful action TDHCA can take to "undo" those awards. Also, as identified by the commenter, the interim AFFH rule that subjects LIHTC to the affirmatively furthering fair housing rule was only put in place in 2021. It would be uninformative to apply standards set in 2021 to awards placed in service a decade or more prior to that rule. No changes to the Analysis of Impediments have been made as a result of these comments.

## 15. Scope - Data in the AI

One commenter indicated that the Draft AI uses a biased dissimilarity index that fails to measure discrimination as defined by the AFFH rule.

*(Comment made by Inclusive Communities Project)*

**Department Response:** The commenter identifies a tract with a score of .41 and claims that this is "integrated" according to the Diversity Index. This is incorrect, as scores closer to 1 indicate higher integration/diversity and scores closer to 0 indicate segregation/low diversity. The diversity index score of .41 accurately represents the example given by the commenter. This incorrect understanding of the diversity index is more pronounced when the commenter indicates that an even split of 50% White and 50% Hispanic would have a score of 0.5 while a 75% White and 25% Hispanic tract would have a score of .75. This is mathematically inaccurate, as evidenced below.
  i.  The 75/25 example :

$$\frac{((1 + .25) * (1 + .75)) - (2)}{\left(\left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right)\right) - (2)} = .75$$

  ii.  The 50/50 example:

$$\frac{((1 + .5) * (1 + .5)) - (2)}{\left(\left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right)\right) - (2)} = 1$$

As explained in the 2024 AI Appendix specific to the Diversity Index, a higher number indicates a more integrated census tract. A 50/50 split (in a two option case) garners a score of 1 while a 75/25 split garners a score of .75. As 1 is higher than .75, the Index correctly identifies the 50/50 split as the more diverse outcome. It is crucial to note that scores in the examples like this are not comparable to scores produced with more than just two categories (as is the case in the Diversity Index maps). No changes to the Analysis of Impediments have been made as a result of these comments.

Multiple commenters stated the AI should include inspection scores and violations and tenant and neighborhood populations.

*(Comment made by Sharon Underwood, AARP Texas and Texas Housers)*

**Department Response:** The current AI includes information on tenant demographics. The AI does not include information on neighborhoods because analysis of hyperlocal population dynamics is the responsibility of the local jurisdictions that must complete fair housing certifications. Inspections data would be static and not useful information for a 5-year document. Tenant population information is available in the TDHCA's annual compiled Housing Sponsor Report. In response to this comment, TDHCA has included a link to a map that was already available in the Tableau dashboard that shows the percent White, Non Hispanic and Poverty rates by census tract, and the diversity index gives census tract data as well. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter offered that the AI should recommend that TDHCA's Fair Market Rent/Small Area Fair Market Rent (FMR/SAFMR) analysis show that TDHCA is using the higher of FMR and SAFMR, and should inform the public about the difference between FMR and SAFMR.

*(Comment made by Texas Housers)*

**Department Response:** The results of the analysis of FMRs and SAFMRs, and the eventual payment standards used by TDHCA, are publicly available. TDHCA understands that when the draft AI was released, the Department's newly redesigned website did not have a link to current payment standards. It is expected to be added to the website.  No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter indicated the AI fails to indicate that there are not enough Extremely Low Income (ELI) units in Texas.

*(Comment made by Texas Housers)*

> **Department Response:** TDHCA disagrees citing the commenter's acknowledgement that the AI states that only 4.2% of LIHTC units are set aside for ELI Texans, while 21.5% of renter households in Texas are ELI. The commenter continues to say "TDHCA mentions the need for extremely low income units but fails to take the extra step of demonstrating that need with readily available data." TDHCA again disagrees, and notes that not only does the AI provide said data, but that data is also in line with the commenter's own data source (NLIHC Gap Report). However, in response to this comment, TDHCA will include the data provided in the AI, as one of the reasons for identifying Impediment 1.

A commenter suggested that the AI fails to include tenant income data and should compare LIHTC tenant incomes to rents.

*(Comment made by Texas Housers)*

> **Department Response:** TDHCA did not feel that it was necessary to provide detailed tenant income data when TDHCA reached the same conclusion as the commenter, which was that many tenants in TDHCA monitored properties are renting units with rents higher than what they could otherwise qualify for. There are not enough ELI or VLI units to meet the number of ELI households. Specific income data will not change that fact, nor does it alter the conclusion that more ELI units are needed.  No changes to the Analysis of Impediments have been made as a result of these comments.

**16. Scope – Local and Regional Coverage**

One commenter stated that recommendations in the AI should not be limited only to actions that can be taken by some state agencies.

*(Comment made by Texas Housers)*

> **Department Response:**  The duty to affirmatively further extends to agencies that receive certain federal housing funds and resources. The state agencies that administer these funds and resources do not have authority to opine on what other state agencies or local entities should do in their steps towards affirmatively furthering fair housing. No changes to the Analysis of Impediments have been made as a result of these comments.

**17. Scope - Proactivity**

One commenter indicated that the AI relies too heavily on education and outreach to address impediments.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA disagrees. Education and outreach efforts are key to not only reducing discrimination, but also to combating NIMBYism. They are also the most cost effective efforts when additional funds are not available or consistent. No changes to the Analysis of Impediments have been made as a result of these comments.

Two commenters noted that TDHCA should provide tenants rights training to tenants at non-subsidized housing.

*(Comment made by Joy Davis and Texas Housers)*

**Department Response:** TDHCA does not have jurisdiction over the rights of all Texas tenants and is not the agency that enforces those rights. TDHCA refers tenants needing information on their rights to Texas Law Help.org. No changes to the Analysis of Impediments have been made as a result of these comments.

One comment stated the AI must place tenant expertise at the center of relevant recommendations.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA relies on input at specific events like the TDHCA Governing Board meetings, QAP roundtables, and public hearings. As mentioned in a previous reasoned response, the 2024 AI will add further detail on surveying LIHTC tenants to the recommendation that includes investigating partnering with state universities and other institutions.

One commenter stated TDHCA should add a recommendation to notify existing tenants of a property when that property applies for rehabilitation funds.

*(Comment made by Texas Housers)*

**Department Response:** TDHCA appreciates this comment and will consider this suggestion in the development of its QAP. As a result, a recommendation has been added that states: Consider notification requirements for tenants at properties that apply for rehabilitation funds or tax credits from TDHCA.

One comment indicated that TDHCA should strengthen affirmative marketing requirements and ensure that properties in TDHCA's portfolio are working with public housing authorities to connect voucher holders to properties that must accept vouchers.

*(Comment made by Texas Housers)*

**Department Response:** All individuals who call or email TDHCA requesting resources related to finding affordable housing are provided with a list of TDHCA-monitored properties and contact information for the local Public Housing Authorities (PHA). TDHCA does not have any jurisdiction over PHA's and cannot compel them to work with properties. TDHCA is also including a new recommendation: Research offering a multifamily affirmative marketing tool to be available for properties in identifying least likely to apply populations more accurately, and in streamlining the process of creating an affirmative marketing plan.

Multiple commenters suggest that the state of Texas has not done enough to provide affordable housing in high opportunity areas.

*(Comment made by Donna Pryor, Chanttani Schrock, Karla Graham, Trish Woods and Brigite Norris, Inclusive Communities Project, Texas Housers, NAACP Legal Defense Fund)*

**Department Response:** The state strives to improve the siting of affordable housing in high opportunity areas through the annual development of the QAP. TDHCA encourages commenters and all Texans to participate in the process to improve outcomes for Texas families. No changes to the Analysis of Impediments have been made as a result of these comments.

One commenter stated that the Texas Workforce Commission should be more efficient and more transparent in its enforcement of the Fair Housing Act.

*(Comment made by Christopher Jenkins)*

**Department Response:** The commenter included no specific metrics for "efficacy" or particular areas where more transparency was needed. No changes have been made to the Analysis of Impediments as a result of this comment.

Two commenters suggested that the Analysis of Impediments lacks specific actions or time frames for implementing recommendations

*(Comment made by Texas Housers and Texas Appleseed)*

**Department Response:** TDHCA has provided specific actions. The timeframe for actions related to recommendations is the 5-year period covered by the document. No changes have been made to the Analysis of Impediments as a result of this comment.

Introduction

# Chapter 2 - Statewide Overview of Demographics and Economic Conditions

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

## Purpose of This Section

This section will provide an overview of the demographic characteristics of Texas residents that may influence housing choice and housing needs and provide information on concentrations by race, ethnicity and poverty. The section also provides information on special needs populations as defined in TDHCA's State of Texas Low-Income Housing Plan and Annual Report (SLIHP) and by the State of Texas 5-year Consolidated Plan, as defined in 24 CFR §91.305. These special needs populations include the following groups: elderly persons, farmworkers, persons experiencing homelessness, youth experiencing homelessness (<25 years of age), persons living with HIV/AIDS and their families, persons with disabilities (mental, physical, and developmental), persons with substance use disorders, persons with Violence Against Women Act (VAWA) protections, residents of colonias, residents of public housing, veterans and wounded warriors, youth aging out of foster care, as well as individuals and families of moderate, low, very low and extremely low income.

## Organization, Definitions, and Data Sources

This chapter provides an overview of the state as a whole. Chapter 3 further evaluates these resources to provide regional profiles which include county-level data. The primary data sources for this chapter are the U.S. Census Bureau's five-year American Community Survey (2017-2021), the Texas Demographic Center Population Projections Project, the U.S. Census Bureau's 2020 Decennial Census, and HUD's Comprehensive Housing Affordability Strategy Data (2016-2020). Within the state summary, data for metro and non-metro areas are reported separately where relevant and available. One limitation of the available data is that the definitions of "disability" used by the data sets is not identical to the definition given in the Fair Housing Act (FHA).

> *"[The FHA] defines persons with a disability to mean those individuals with mental or physical impairments that substantially limit one or more major life*

*activities. The term mental or physical impairment may include conditions such as blindness, hearing impairment, mobility impairment, HIV infection, mental retardation, alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness. The term major life activity may include seeing, hearing, walking, breathing, performing manual tasks, caring for one's self, learning, speaking, or working. The Fair Housing Act also protects persons who have a record of such an impairment, or are regarded as having such an impairment."*[1]

## Racially or Ethnically Concentrated Areas of Poverty

HUD has developed a census tract-based definition of Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs[2]). The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50% or more of the tract's total population. The poverty threshold is defined by HUD as neighborhoods of extreme poverty which are census tracts in which 40% or more of the individuals in the tract are living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this poverty threshold with an alternate criterion; that criterion would also classify a tract as a R/ECAP if the tract's rate of individuals in poverty is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts which meet one of the two thresholds for extreme poverty, and also satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. It should be noted that HUD's methodology for R/ECAPs includes only racial and ethnic minorities; it does not contemplate white racially concentrated areas of poverty.

## TDHCA Service Regions

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

**\*\*\*For all figure links cited below, click on that link and navigate to the tab that corresponds to the figure title. Once in Tableau, to highlight a specific region use the Region drop down located on the right hand side of the Tableau mapping window. Check only the box of the**

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[1] The Department of Justice. "The Fair Housing Act", updated June 22, 2023.
[2] AFFH-T Data Documentation, Data Version AFFHT0004, November 2017.

**Region you would like to view. Please note that you may select multiple Region boxes to compare data across regions.\*\*\***

**Figure 2-1: State of Texas Regional Map-State of Texas Counties by Region**

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

> *"…a Core Based Statistical Area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting."*[3]

Any county that is identified by the OMB in April 2023 as being in an MSA is considered to be a Metro county in the AI analysis, and throughout this document. Any county outside of an MSA is considered to be a Non-Metro county.

## Statewide Demographic Data

### State of Texas Population Growth

Between 2010 and 2020 the population of Texas grew by 16% (4.0 million residents)—more than twice the rate of growth for the U.S. as a whole (6.8%). Since 2020, Texas has continued to experience robust population growth. This population growth is primarily through a combination of natural population increase and net migration. According to the U.S. Census Bureau for each year between 2000 and 2022, the state of Texas has had the nation's largest annual population growth of any state. The state's major metropolitan statistical areas (Austin-Round Rock, Dallas-Fort Worth-Arlington, Houston-The Woodlands-Sugar Land, and San Antonio-New Braunfels) are leading areas of population growth in Texas.[4]

### Race and Ethnicity

Figure 2-2 shows the Diversity Index by Census tract for the State of Texas. The Diversity Index is a metric designed to measure how equally distributed races and ethnicities are in a particular area. Mathematically, the index can range from zero to one, in which zero would represent an area where every person was the same race and ethnicity, while a score of one would represent

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[3] Federal Register Part IV, Volume 75, Number 123, 37252. Monday, June 28, 2010.
[4] United States Census Bureau. "Texas Joins California as State with 30-Million-Plus Population."

an area where every person was a different race and ethnicity. In short, the more evenly distributed people are as it relates to race and ethnicity in an area, the closer to a score of one the diversity index would get. It should be noted that, while mathematically possible to achieve a score of one, in reality it would be impossible to achieve a diversity score of one because the number of race and ethnicity options measured by ACS data are not unlimited. The ACS provides data for race in seven different categories (White, Black and African American, Asian, American Indian and Alaskan Native, Hawaiian and Other Native Pacific Islander, Some Other Race Alone, and Two or More Races) and ethnicity in two categories (Hispanic or Latino Origin and Not Hispanic or Latino Origin). For more information on the diversity index and to see its mathematical form, please see on page 316 Appendix C -. For the purposes of clarity, the Diversity Index is used in lieu of other theoretical metrics due to it being relatively simple and easily understood. The Diversity Index is calculated for each Census tract. A higher Diversity Index score means that the tract's racial and ethnic composition is more evenly distributed between racial and ethnic groups while a lower score means that there is a concentration in the tract of only a few racial and ethnic groups.

**Figure 2-2: Diversity Index by Census Tract, Texas-MF Apps 2018-2022 vs. Diversity Index by Region, 2020 Census Data**

Figure 2-3 displays the population estimates for Texas by race and ethnicity in 2010 and 2018, and population projections for 2020, 2030, 2040 and 2050. These projections reveal that the White population is expected to remain fairly consistent in raw numbers, with the percentage White population gradually decreasing, the Black population increasing slightly, the Other population almost doubling, and the Hispanic population increasing significantly from 9.4 million in 2010 to an estimated 21.5 million in 2050. All population projections in the AI used the Texas Demographic Center's (TDC) half migration scenario, which assumes that the migration rate (population change excluding birth and death rates) from 2000 to 2010 will continue at half of its rate from 2010 to 2050. This is the scenario that TDC recommends when looking at long term population projections. In January 2019, the TDC further refined their migration scenario, using the migration rate from 2010 to 2015. In the 2010 to 2015 scenario, the Texas population is predicted to grow by an additional 7 million individuals statewide over the half-migration scenario.[5]

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

|  | 2018 | 2010 | 2020 | 2030 | 2040 | 2050 |
|---|---|---|---|---|---|---|
| **White** | 11,674,950 | 11,397,345 | 11,723,184 | 11,792,588 | 11,593,202 | 11,265,371 |

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[5] Texas Demographic Center. Texas Population Projections 2010 to 2050. January 2019.

|  | **2018** | **2010** | **2020** | **2030** | **2040** | **2050** |
|---|---|---|---|---|---|---|
| **Growth** |  |  | 2.86% | 0.59% | -1.69% | -2.83% |
| **Black** | 3,199,578 | 2,886,825 | 3,274,738 | 3,616,745 | 3,876,830 | 4,065,757 |
| **Growth** |  |  | 13.44% | 10.44% | 7.19% | 4.87% |
| **Other** | 1,756,663 | 1,400,470 | 1,851,409 | 2,369,978 | 2,984,989 | 3,655,259 |
| **Growth** |  |  | 32.20% | 28.01% | 25.95% | 22.45% |
| **Hispanic** | 11,428,226 | 9,460,921 | 11,963,951 | 14,900,906 | 18,095,574 | 21,516,362 |
| **Growth** |  |  | 26.46% | 24.55% | 21.44% | 18.90% |

Source: Texas Demographic Center, Population Projections Project, Data as of 6/18/18[6].
Note: Texas Demographic Center projections include Hispanic as a race, not an ethnicity.

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[6] The Texas Demographic Center's most recent Population Projections by Race and Ethnicity is based off 2018 data. According to the TDC this is, "Due to the delay in the release of the 2020 Decennial Census detailed demographic data and the changes implemented in the 2020 Decennial Census, such as the new measures to provide privacy protection as well as the changes in the race/ethnic questions and the processing, projections with demographic details, especially at the county level, are not available now. Further research is needed to produce reasonable, detailed projections by race/ethnicity. Contact TDC for questions."

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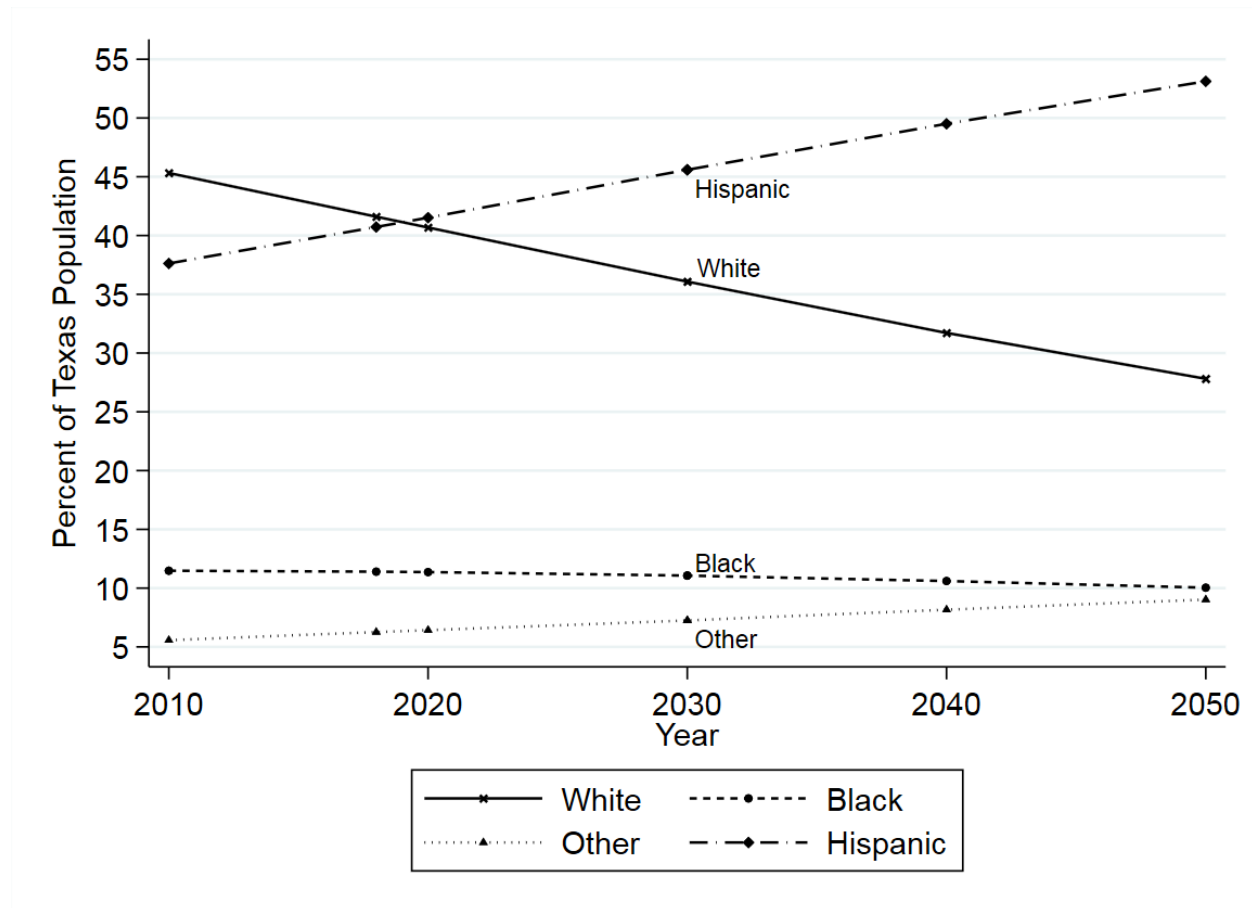


Source: Texas Demographic Center, Population Projections Project, Data as of 6/18/18.
Note: Texas Demographic Center projections include Hispanic as a race, not an ethnicity.

Figure 2-4 plots the population projections of Texas by race and ethnicity as a percentage of the state population from 2010 through 2050. In 2010, Texas was already a majority-minority state, meaning that minority populations together were greater than 50% of the population as a whole. By 2020, the TDC projects that Hispanics will be the largest population in the state and that by 2050, Hispanics will make up more than half of the Texas population. Almost all of this demographic trend will be as a result of an aging White population.

## Age

As is the case in many states, the population of Texas is aging. In 2010, the median age was 34.5; by 2016 the median age had increased almost two years to 34.2 years. Before 2050, the

population of Texans aged 64 to 84 years is expected to more than double and the population of Texans aged 85 and older is expected to more than triple. Figure 2-5 displays the projected population sizes, for age groups under 18 years, 18 to 24 years, 25 to 44 years, 45 to 64 years, 64 to 84 years and 85 years and older.

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

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

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

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

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

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



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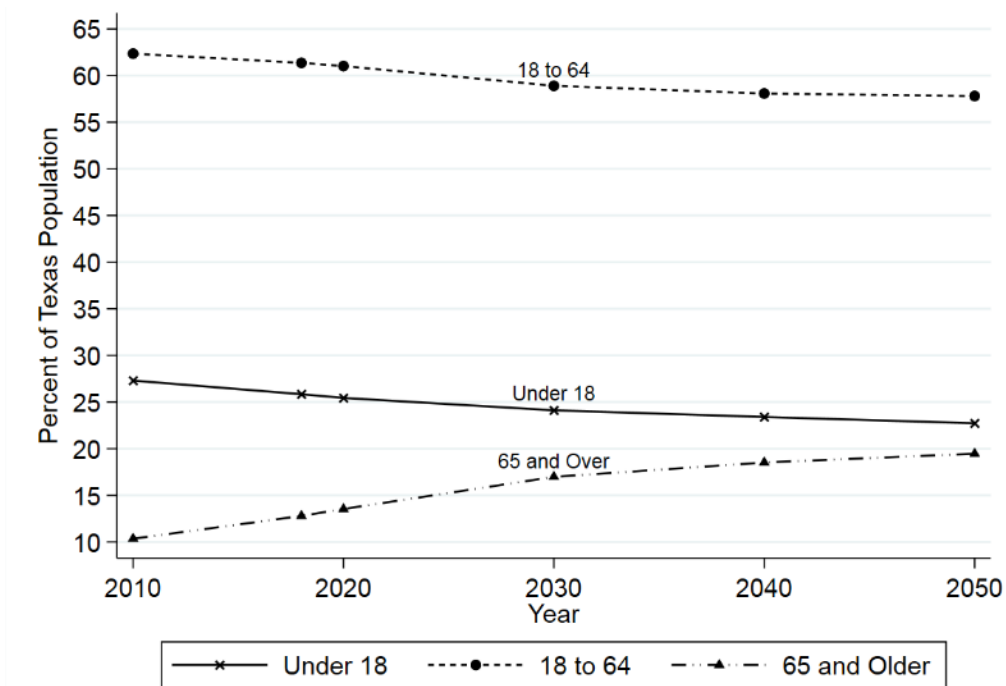
Source: Texas Demographic Center, Population Projections Project, Data as of 6/18/18.

## Household Composition

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

> *"… a householder and one or more other people living in the same household who are related to the householder by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of his or her family. A family household may contain people not related to the householder, but those people are not included as part of the householder's family in tabulations. Thus, the number of family households is equal to the number of families, but family households may include more members than do families. A household can contain only one family for purposes of tabulations. Not all households contain families since a household may be comprised of a group of unrelated people or of one person living alone – these are called nonfamily households. Families are classified by type as either a "married-couple family" or "other family" according to the sex of the householder and*

> *the presence of relatives. The data on family type are based on answers to questions on sex and relationship that were asked of all people."*[7]

A non-family household is defined as:

> *"…a householder living alone or with nonrelatives only. Unmarried couples households, whether opposite-sex or same-sex, with no relatives of the householder present are tabulated in nonfamily households."*[8]

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

In 2021, approximately 35.8% of all Texas households were families with children under age 18. Only 0.6% of non-family households had a minor child under the age of 18. The average non-family household size is 1.19, whereas the average family household size, both single parent and two-parent households was 3.29. Figure 2-7 displays the state's 2021 household composition.

**Figure 2-7: Household Composition, Texas, 2017 to 2021**

| | |
|---|---|
| **Average Household Size** | 2.76 |
| **Average Family Household Size** | 3.29 |
| **Average Non-Family Household Size** | 1.19 |
| **Percent of Households with a Minor** | 32.1% |

Source: 2017-2021 American Community Survey, Tables S2501 and S1101.

Of the 10.2 million households in Texas, 68.9% are family households, with family household sizes ranging from two person households to seven or more person households. Texas households are diverse in number; this is an important consideration in housing availability and choice as households with large household sizes may find it difficult to find sufficiently sized rental housing stock and affordable housing stock. The large portion of the state being comprised of family households affirms the need for a diverse portfolio of affordable housing options in Texas. Figure 2-8 shows Texas household types and sizes in 2021.

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[7] United States Census Bureau, American Community Survey and Puerto Rico Community Survey 2022 Subject Definitions.
[8] United States Census Bureau, American Community Survey and Puerto Rico Community Survey 2022 Subject Definitions.

**Figure 2-8: Household Types and Sizes, Texas, 2017 to 2021**

| Household Size | Family | Non-Family |
|---|---|---|
| **Total Households** | 7,483,376 | 3,604,332 |
| **1-person household** | - | 81.5% |
| **2-person household** | 38.4% | 15.4% |
| **3-person household** | 23.0% | 2.0% |
| **4-person household** | 20.7% | 0.8% |
| **5-person household** | 10.9% | 0.2% |
| **6-person household** | 4.3% | 0.1% |
| **7-or-more person household** | 2.6% | 0.0% |

Source: 2017-2021 American Community Survey, Table B11016.

The vast majority of non-family households consist of only one individual (81.5%), while among family households approximately 80% of the households are represented by 2, 3 and 4 member households. This data indicates that there is a need for 1-bedroom units, and a need for larger units to provide for families with household sizes greater than two.

## Disability

There are more than three million Texans with a disability (11.4% of the total non-institutionalized state population) and a significant number of persons with disabilities face extreme housing needs. The 2017-2021 ACS data show that 19.2% of individuals who have a disability live below the poverty level, while 11.2% of individuals who do not have a disability live below the poverty level. As demonstrated by Figure 2-9, which shows disability types by age group, seniors are much more likely to have a disability than non-seniors. For non-seniors, ambulatory and cognitive disabilities are the most common type of disability. Persons with disabilities face challenges finding housing that is affordable, accessible, and located near transit and supportive services.

**Figure 2-9: Disability Type by Age Group in Texas, 2017 to 2021**

| Disability Type | 65 Years and Over | Under 65 Years | All Ages |
|---|---|---|---|
| **Ambulatory** | 23.3% | 3.1% | 6.0% |
| **Cognitive** | 8.8% | 3.7% | 4.6% |
| **Hearing Difficulty** | 14.8% | 1.5% | 3.2% |
| **Independent Living** | 14.5% | 2.2%* | 5.1% |
| **Self-Care** | 8.2% | 1.3% | 2.3% |

| Disability Type | 65 Years and Over | Under 65 Years | All Ages |
|---|---|---|---|
| **Vision Difficulty** | 7.4% | 1.8% | 2.5% |
| **Any Disability** | 35.7% | 8.0% | 11.4% |

Source: 2017-2021 American Community Survey, Table S1810.
Note: Individuals may have more than one disability type.
*The ACS does not provide estimates for the number of residents under 18 with an Independent Living disability.

The state's proportion of persons with a disability (11.4%) is largely driven by the population over age 65. More than a third of all persons 65 and over have at least one disability. Almost a quarter of the population over 65 has an ambulatory disability, further highlighting the need for accessible units and access to accessible transportation options. When considered in combination with the aging nature of Texas's projected population, the incidence of disability is likely to increase over the coming decades.

## Economic Data

### Income

The median household income of Texans was $67,321 in 2017-2021, slightly lower than the national median of $72,284. Seventeen point one percent (17.1%) of Texas households earn less than $25,000 per year and 19.1% of families earns less than $35,000 per year. Figure 2-10 displays the 2021 income distribution by household type in Texas. It should be noted that the number of households reflected for each income band is a discrete total, however the percentage of households and percent of families are not discrete to each income band, but are cumulative so that each percentage shown reflects the percentage calculated based on the total households for that row plus all households from lower incomes as well.

**Figure 2-10: Income by Household Type, Texas 2017 to 2021**

| | Households | Percent of Households at or Below Income Group | Families | Percent of Families at or Below Income Group |
|---|---|---|---|---|
| **Less than $10,000** | 269,585 | 5.7% | 269,585 | 3.8% |
| **$10,000 to $14,999** | 162,966 | 9.4% | 162,966 | 6.1% |
| **$15,000 to $24,999** | 409,146 | 17.1% | 409,146 | 11.9% |

| | Households | Percent of Households at or Below Income Group | Families | Percent of Families at or Below Income Group |
|---|---|---|---|---|
| **$25,000 to $34,999** | 511,268 | 25.6% | 511,268 | 19.1% |
| **$35,000 to $49,999** | 755,639 | 37.3% | 755,639 | 29.8% |
| **$50,000 to $74,999** | 1,188,521 | 54.6% | 1,188,521 | 46.6% |
| **$75,000 to $99,999** | 964,644 | 67.3% | 964,644 | 60.3% |
| **$100,000 to $149,999** | 1,338,854 | 83.5% | 1,338,854 | 79.3% |
| **$150,000 to $199,999** | 673,187 | 91.2% | 673,187 | 88.8% |
| **$200,000 or more** | 782,000 | 99.9% | 782,000 | 99.9% |
| **Total Households** | 10,239,341 | - | 7,055,810 | - |

Source: 2017-2021 American Community Survey, Table DP03.

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

More than half of Texas households live below 100% of HUD's Area Median Family Income (AMFI); of those households, four out of five are low income with incomes at or below 80% AMFI, and a quarter of those households are very low income with incomes at or below 50% AMFI. All in all, more than one in ten Texas households is classified as extremely low income with incomes at 30% AMFI or less. This supports the continued need for affordable units for low income, very low income, and extremely low income households. Figure 2-11 displays the number and percent of households in HUD's Area Median Family Income Groupings.

**Figure 2-11: Households at Area Median Family Income Groupings, Texas, 2016 to 2020**

| Income Grouping | Household Count | Percent |
|---|---|---|
| **0 to 30% AMFI** | 1,288,250 | 13.0% |
| **30 to 50% AMFI** | 1,196,273 | 12.1% |
| **50 to 80% AMFI** | 1,712,836 | 17.3% |
| **80 to 100% AMFI** | 1,012,885 | 10.2% |
| **>100% + AMFI** | 4,695,928 | 47.4% |
| **Total** | 9,906,065 | 100.0% |

Source: HUD Comprehensive Housing Affordability Strategy Data, 2016-2020, Table 8.

Figure 2-12 displays median income by household and family size.

**Figure 2-12: Median Income by Household and Family Size, Texas, 2017 to 2021**

| Family Size | Median Income (dollars) |
|---|---|
| **All Households** | 67,321 |
| **1-Person Households** | 36,673 |
| **All Families** | 80,498 |
| **2-Member Families** | 72,702 |
| **3-Member Families** | 80,196 |
| **4-Member Families** | 94,466 |
| **5-Member Families** | 86,516 |
| **6-Member Families** | 84,323 |
| **7+ Member Families** | 86,019 |

Source: 2017-2021 American Community Survey, Tables B19119 and B19019.

## Employment

Since 2007, the unemployment rate in Texas has generally been lower than the national unemployment rate. In 2021 Texas' unemployment rate became higher than the national rate and that trend has continued into 2023. At the end of 2023, the unemployment rate for Texas and the United States was 4.1% and 3.6% respectively. Figure 2-13 graphs the unemployment rate in Texas and the United States from 2000 to 2017.

**Figure 2-13: Unemployment Rate in Texas and the United States, 2000 to 2017**

Source: U.S. Bureau of Labor Statistics, Unemployment Rate [UNRATE], retrieved from FRED, Federal Reserve Bank of St. Louis, February 15, 2024.

As of December of 2023 the largest job sector in the State of Texas is Trade, Transportation and Utilities, which supports 2.8 million jobs statewide, or 19.9% of total nonfarm employment. The next largest employment sectors include Professional and Business Services (15.2%), Government (14.7% of nonfarm jobs) and Education and Health Services (13.7%).

## Poverty

According to the U.S. Census Bureau, a person's poverty status is determined by comparing the person's total family income with the poverty threshold appropriate for that person's family size and composition. If the total income of that person's family is less than the poverty threshold appropriate for that family, then the person is considered to be in poverty, together with every member of his or her family. If a person is not living with anyone related by birth, marriage or adoption, then the person's own income alone is compared with the poverty threshold for a one-person household. The same procedure applies for calculating households in poverty. In 2021, the federal poverty threshold for a family of four was $27,479, for a single householder under the age of 65 was $14,097, and for a single householder aged 65 or older was $12,996. Figure 2-14 displays the poverty rate by age, race/ethnicity, disability and family status.

**Figure 2-14: Poverty Status for Population for Whom Poverty Status Can Be Determined, Texas, 2017 to 2021**

|  | Total | In Poverty | Poverty Rate |
|---|---|---|---|
| **State of Texas** | 28,260,264 | 3,965,117 | 14.0% |
| **Poverty By Age** |  |  |  |
| **Children under 5** | 1,930,772 | 412,660 | 21.4% |
| **Children under 18** | 7,355,933 | 1,442,731 | 19.6% |
| **Seniors (65 and older)** | 3,549,521 | 392,041 | 11.0% |
| **Poverty by Race/Ethnicity** |  |  |  |
| **American Indian and Alaskan Native** | 143,949 | 21,265 | 14.8% |
| **Asian** | 1,436,748 | 138,821 | 9.7% |
| **Black or African American** | 3,364,471 | 627,050 | 18.6% |
| **Native Hawaiian and Other Pacific Islander** | 23,703 | 4,232 | 17.9% |
| **White** | 18,209,673 | 2,261,622 | 12.4% |
| **Some other race** | 1,989,738 | 398,635 | 2.0% |

| | Total | In Poverty | Poverty Rate |
|---|---|---|---|
| **Two or more races** | 3,091,982 | 513,492 | 16.6% |
| **Hispanic or Latino Origin (of any race)** | 11,291,275 | 2,177,111 | 19.3% |
| **Poverty by Disability Status** | | | |
| **Total Population with a Disability** | 3,232,860 | 646,572 | 20.0% |
| **Population Under 5 years with a Disability** | 12,443 | 3,745 | 30.1% |
| **Population 65 and over with a Disability** | 1,405,046 | 224,493 | 16.0% |
| **In Family Households** | 24,240,356 | 3,065,179 | 12.6% |

Source: 2017-2021 American Community Survey, Tables S1701, S1703, and B17021; 2021 American Community Survey, Table B18130.

Fourteen percent (14.0%) of all Texans live in poverty; however, higher poverty rates are seen disproportionately in different subsets of the population. Almost one fifth of minors live in poverty (21.4% for children under 5, and 19.6% for children under 18). Individuals with a disability also experience poverty at a higher rate (20.0%) than the general population. Among minorities, poverty is highest for persons of Hispanic or Latino origin (19.3%) and Black or African American race (18.6%).

## Special Needs Populations Data

Special needs populations, as identified in the 2024 State of Texas Low Income Housing Plan and Annual Report (SLIHP), include persons experiencing homelessness, elderly persons, persons with disabilities (mental, physical, and developmental), persons with substance use disorders, farmworkers, persons living with HIV/AIDS and their families, persons with Violence Against Women Act (VAWA) protections, residents of colonias, residents of public housing, and youth aging out of foster care and Veterans and wounded warriors. The special needs populations identified in the State of Texas 5-year Consolidated Plan are all included with additional populations identified in the Department's SLIHP in order to provide a fuller understanding of the State's special needs populations. Estimates of the proportions and numbers of special needs residents in Texas follow.

### Persons Experiencing Homelessness

According to the 2023 Point-in-Time count compiled by HUD of sheltered and unsheltered persons experiencing homelessness, there are 27,377 homeless persons in Texas. Texas is one of five states that together accounted for half of the nation's population experiencing homelessness in 2023 with 4.2% of the national total in Texas. Between 2022 and 2023, Texas experienced a 13% increase of individuals experiencing homelessness. However, between 2007 and 2023, Texas

saw a 31.2% decrease in the number of people experiencing homelessness compared to other states. Figure 2-15 shows the breakdown of the chronically homeless and homeless veterans.

**Figure 2-15: Homeless Populations, Texas, 2023**

| Homeless Subpopulations | Sheltered | Unsheltered | Total |
|---|---|---|---|
| **Chronically Homeless** | 1,656 | 3,230 | 4,886 |
| **Veterans** | 1,207 | 828 | 2,036 |

Source: U.S. Department of Housing and Urban Development Point in Time Count and Housing Inventory Count, 2023.
Note: Individuals can be members of multiple subpopulations, so the subtotals may not add up to the total number of homeless in Texas.

## Elderly Persons

In 2017-2021, 12.5% of Texans, totaling more than three million residents, were age 65 or older. Of all elderly Texans (aged 55 and over), 85.8**%** live in metro counties and 14.2% live in non-metro counties. Figure 2-16 displays the population of elderly persons in Texas. Figure 2-18 shows the population that is 65 and over with a disability, an approximation for frail elderly, as defined in 24 CFR 91.305. Discussion of frail elderly is included in the AI because of this particular group's possible need for supportive housing.

**Figure 2-16: Persons Aged 55, 62, and 65 Years Old and Over in Texas, 2017 to 2021**

| | Non-Metro | Metro | Total | Percent of Statewide Population |
|---|---|---|---|---|
| **55 and Over** | 980,911 | 5,903,426 | 6,884,337 | 23.9% |
| **62 and Over** | 692,973 | 3,828,131 | 4,521,104 | 15.7% |
| **65 and Over** | 572,585 | 3,048,213 | 3,620,798 | 12.5% |

Source: 2017-2021 American Community Survey, Table S0101.

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

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

As discussed earlier in this chapter, 11.4% of Texas residents - more than 3 million people - have some type of disability. According to Figure 2-17, of those Texans with disabilities, approximately 85.0% live in urban areas. Persons with disabilities are more likely to live in urban areas due to their ability to access transportation and the close proximity to health related and other services and supports.[9] This subpopulation is included in the AI because of this particular group's possible need for supportive housing.

**Figure 2-17: Persons with Disabilities, Texas, 2017 to 2021**

| Non-Metro | Metro | Total Non-Institutionalized Civilian Population | Percent of Civilian Non-Institutionalized Population with a Disability |
|---|---|---|---|
| 489,137 | 2,757,877 | 28,410,863 | 11.4% |

Source: 2017-2021 American Community Survey, Table S1810.

There are close to 1.9 million persons aged 18-64 years with a disability, which is 10.4% of that age group. There are 352,685 children aged 5-17 years with a disability in Texas, which is 6.4% of that age group. There are approximately 1.4 million persons 65 years and older with a disability, which is 35.6% of that age group. Figure 2-18 shows the age breakdown of persons with disabilities as compared to the total population.

**Figure 2-18: Persons with Disabilities as a Percentage of Total Population in Texas, 2017 to 2021**

| | Population with a Disability | Total Non-Institutionalized Population | Percent of Non-Institutionalized Population with a Disability |
|---|---|---|---|
| **Under 5 Years** | 12,837 | 1,881,718.00 | 0.7% |
| **5 to 17 Years** | 352,685 | 5,550,053.00 | 6.4% |
| **18 to 64 Years** | 1,894,835 | 18,161,100.00 | 10.4% |
| **65 Years and Over** | 1,405,046.00 | 3,946,613.00 | 35.6% |
| **Total** | 3,665,403.00 | 29,539,484.00 | 12.4% |

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[9] Housing and Health Services Coordination Council meeting transcript, Testimony before the Housing & Health Services Coordination Council Public Forum

Source: 2017-2021 American Community Survey, Table S1810.

## Persons with Substance Use Disorders

The 2022 preliminary National Survey on Drug Use and Health (NSDUH) estimates that 15.4%% of Texans 18 or older were dependent on or abused an illicit drug or alcohol in the past year. This is higher than the national estimate of 13.4%.[10] Alcohol and substance use issues can be linked to housing problems, including homelessness. Many individuals with substance use issues face multiple barriers to accessing housing while suffering from addiction. Housing first programs, which are programs that seek to stably house a homeless individual with a substance use disorder without or before requiring treatment, do not increase the likelihood of an individual to continue heavy alcohol or drug use, even though those without housing reported higher rates of psychiatric and substance use treatment.[11] The Fair Housing Act protects persons who are recovering from substance use. It does not protect persons who are currently engaging in the current illegal use of controlled substances. It would be illegal under the FHA to refuse to rent to someone solely on the basis of their status as a recovering substance user. However, some factors in finding a unit, such as an individual's credit or criminal history, may be impacted by their substance use related disability making their ability to find housing more challenging. This subpopulation is included in the AI because of this particular group's possible need for supportive housing.

## Persons Living with HIV/AIDS and Their Families

Human Immunodeficiency Virus (HIV) is the virus that causes Acquired Immunodeficiency Syndrome (AIDS). HIV infects cells and attacks the immune system, which weakens the body and makes it especially susceptible to other infections and diseases. Because of increased medical costs, the loss of the ability to work and earn income, or stigma, people with HIV/AIDS may be at risk of losing their housing arrangements. Although the number of Texans living with HIV rises each year, Texas has seen a steep decline in the number of deaths among persons with HIV. As reported by the Texas Department of State Health Services, there were 97,844 Texans living with a diagnosed HIV infection at the end of 2021 and 98,854 Texans living with a diagnosed HIV infection at the end of 2021.[12] Figure 2-19 shows the number of persons living with HIV in Texas.

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[10] NSDUH, (2021). 2021 NSDUH: Model-Based Estimated Totals For States (In Thousands).
[11] Padgett, Deborah K, Leyla Gulcur, and Sam Tsemberis. Housing First Services for People Who Are Homeless with Co-Occurring Serious Mental Illness and Substance Abuse. Research on Social Work Practice, Vol. 16 No. 1, January 2006.
[12] Texas Department of State Health Services. (2022, November 7). 2021 Texas HIV PLWH surveillance report Unpublished Data: 2021.

Persons living with HIV/AIDS may be considered disabled if the disease substantially limits at least one major life activity, the person has a record of an impairment, or is regarded as having an impairment. This subpopulation is included in the AI because of this particular group's possible need for supportive housing.

**Figure 2-19: Persons Living with HIV in Texas, 2021**

| State | Persons with HIV-Rural[13] | Persons with HIV-Urban | Total Persons with HIV[14] | 2017-2021 Total Population | Percent of Persons with HIV to Statewide Population |
|---|---|---|---|---|---|
| **Total** | 5,017 | 93,837 | 98,854 | 28,862,581 | 0.34% |

Source: Texas Department of State Health Services, 2022.
Note: Figures do not include those unaware of their HIV infection or those who tested HIV positive solely through an anonymous HIV test.

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

Persons with VAWA protections include survivors of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are available equally to all individuals regardless of sex, gender identity, or sexual orientation. In some instances advocates have used the Fair Housing Act's prohibition of discrimination based on sex to ensure persons with VAWA protections are not discriminated against in accessing housing. According to the Texas Department of Public Safety there were 247,553 family violence incidents and 247,649 victims of a family violence incident in 2021. One incident can involve multiple victims, and one victim can experience multiple incidents. However, the numbers reported below do not reflect the severity of the problem. According to data from the National Crime Victimization Survey, in 2022 only 41.5% of violent crimes were reported to police, while only 21.4% of rapes or sexual assaults were reported. Only 53.8% of domestic violence incidents were reported to police.[15] Figure 2-20 shows the number of reported victims of domestic violence in Texas in 2022.

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[13] Due to the way this data were aggregated to protect the anonymity of the subject, urban and rural is used here instead of metro and non-metro.

[14] The 3,946 people counted in Texas Department of Criminal Justice facilities, Federal Prison facilities, and Federal Immigration and Customs Enforcement facilities are not attributed to a geographic area.

[15] Morgan, Rachel and Jennifer Truman. Bureau of Justice Statistics. "Criminal Victimization, 2022".

**Figure 2-20: Victims of Domestic Violence, Texas, 2017**

| Area | Total Victims in 2023 | Total Population, 2017-2021 | % of Victims to Population |
|---|---|---|---|
| **Non-Metro** | 22,236 | 3,188,571 | 0.70% |
| **Metro** | 259,337 | 25,674,010 | 1.01% |
| **Texas** | 281,629* | 28,862,581 | 0.98% |

Source: Texas Department of Public Safety, 2022 and 2017-2021 American Community Survey.
*56 victims were unable to be categorized as residing in Metro or Non-Metro counties

## Residents of Colonias

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

> *a geographic area located in a county some part of which is within 150 miles of the international border of this state, consists of 11 or more dwellings that are located in close proximity to each other in an area that may be described as a community or neighborhood, has a majority population composed of individuals and families with low income and very low income, based on the federal OMB poverty index and meets the qualifications of an economically distressed area under Section 17.921, Water Code; or has the physical and economic characteristics of a colonia, as determined by the department.*

Many colonias are located along the border region, usually beyond the limits of incorporated areas where there are fewer local codes and regulations. The classic hallmarks of colonias include limited infrastructure and a high level of substandard housing, including self-built homes, structures not primarily intended for residential use, and homes with extensions and modifications, often added on a self-help basis, which may not be secure or safe. An estimated 500,000 people live in 2,294 colonias in Texas.[16] Based on a 2014 assessment by the Texas Secretary of State's Colonia Initiatives Program, six Texas counties (El Paso, Maverick, Webb, Starr, Hidalgo, and Cameron) have the largest population of colonias and are home to an

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[16] Federal Reserve Bank of Dallas. (2015, April). Las Colonias in the 21st Century: Progress Along the Texas-Mexico Border.

estimated 369,500 people. Population numbers in this assessment were validated in several ways: by 2010 census data, by city and county figures, and (in some cases) by colonia ombudspersons conducting site visits. In particular, persons living in colonias may have protections under the Fair Housing Act related to race, ethnicity, and/or national origin status and may have limited English proficiency.

## Residents of Public Housing

As of December, 31 2023, there were 40,069 public housing units in Texas, almost 75% of which were in urban areas. Residents of public housing often have low educational attainment, poor mental and physical health, limited access to social networks that facilitate job access, and physical isolation from opportunity.[17] Figure 2-21 and Figure 2-22 show the race and ethnicity of the householder in public housing units. In Texas, residents of public housing are more likely to be Black than the rest of the statewide population. However, this discrepancy is less stark than in the rest of the United States. While Texas public housing residents are twice as likely to be Hispanic as their peers nationwide, this number is well in line with the overall demographics of the state and does not constitute a disparity. Neither TDHCA nor HUD maintain demographic data about persons on public housing waitlists, so no analysis can be performed.

**Figure 2-21: Race of Head of Household in Public Housing, 2023**

|  | White | Black or African American | American Indian or Alaskan Native | Asian | Native Hawaiian or Other Pacific Islander |
|---|---|---|---|---|---|
| **United States** | 52% | 43% | 1% | 2% | 1% |
| **Texas** | 63% | 35% | 0% | 1% | 0% |

Source: U.S. Department of Housing and Urban Development PIH Information Center Resident Characteristics Report.
Note: Data represents tenants of public housing from September 1, 2022 through December 31, 2023.

**Figure 2-22: Ethnicity of Head of Household in Public Housing, 2023**

|  | Hispanic or Latino | Non - Hispanic or Latino |
|---|---|---|
| **United States** | 27% | 73% |

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[17] Urban Institute. (2013, January). Improving the lives of public housing's most vulnerable families.

| | Hispanic or Latino | Non - Hispanic or Latino |
|---|---|---|
| **Texas** | 35% | 65% |

Source: U.S. Department of Housing and Urban Development PIH Information Center Resident Characteristics Report.
Note: Data represents tenants of public housing September 1, 2022 through December 31, 2023.

Figure 2-23 shows some selected characteristics relating to protected classes of households in public housing. Compared to the rest of Texas, the heads of housing in public housing units are more than three times as likely to have a disability, while equally as likely to have a child. Additionally, a full third of all households in public housing units are a single female head of household with a child.

**Figure 2-23: Selected Characteristics of Households in Public Housing, 2023**

| | Head of Household with a Disability | Household with a Child | Female Head of Household with a Child |
|---|---|---|---|
| **United States** | 38% | 35% | 32% |
| **Texas** | 36% | 42% | 39% |

Source: U.S. Department of Housing and Urban Development PIH Information Center Resident Characteristics Report.
Note: Data represents tenants of public housing from September 1, 2022 through December 31, 2023.

## Youth Aging Out of Foster Care

In Texas, youth in the foster care system age out at 18 years of age (although under a variety of programs they may remain in the system to receive ongoing services and assistance until the age of 24). Foster youth that age out of foster care often have multiple factors that can keep them from entering into or maintaining stable housing and are more likely than other youth to become homeless. In Fiscal Year 2022, 870 foster youth aged out of foster care in Texas, most of which lived in Metro counties. A recent study of youth who had been in foster care found that when asked where they went when they aged out, some of the most common responses included 26% went to a family home, 15% to a foster family home, 5% to a relative's home, 15% to the home of a friend or boyfriend/girlfriend, 5% to transitional living or their own place, and 8% went to

the streets.[18] Figure 2-24 shows the racial and ethnic composition of youth exiting Texas Department of Family and Protective Services (DFPS) Child Protective Services (CPS) custody. While 20.3% of children leaving DFPS custody were Black or African American, Figure 2-24 shows that 26.1% of youth emancipated or aged out were African American. This would mean that because African American children are overrepresented in DFPS custody in Texas, they are also more likely to be overrepresented in those aging out of the system.

**Figure 2-24: Race and Ethnicity of Youth Exiting DFPS Custody in Texas, 2023**

| | White | African American | Hispanic | Other | Asian | Native American |
|---|---|---|---|---|---|---|
| **Custody with Relatives with PCA** | 24.56% | 31.54% | 38.37% | 5.23% | 0.15% | 0.00% |
| **Custody with Relatives without PCA** | 30.29% | 23.43% | 39.52% | 6.11% | 0.34% | 0.12% |
| **Family Reunifications** | 28.10% | 18.27% | 46.39% | 6.24% | 0.70% | 0.16% |
| **Non Relative Adoption** | 34.86% | 15.89% | 41.31% | 7.15% | 0.58% | 0.08% |
| **Other** | 38.13% | 12.95% | 38.85% | 5.76% | 2.16% | 2.16% |
| **Relative Adoption** | 26.07% | 18.47% | 50.17% | 4.73% | 0.28% | 0.11% |
| **Youth Emancipation** | 31.03% | 26.09% | 38.16% | 3.22% | 0.92% | 0.23% |
| **Total Leaving DFPS Custody** | 29.76% | 20.34% | 43.16% | 5.90% | 0.53% | 0.15% |

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

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[18] Narendorf, S., Santa Maria, D. & Cooper, J. (2015). YouthCount 2.0!: Full report of findings. Houston, TX.

## Veterans and Wounded Warriors

According to the 2017-2021 American Community Survey, in 2021, there were 1,426,641 Veterans in Texas, which is 6.7% of the Texas population over the age of 18. During the 2023 Point-in-Time count, 7.4% of the adult population experiencing homelessness identified as Veterans. On a single night in 2023, there were 35,574 Veterans experiencing homelessness in the United States. Between 2022 and 2023, homelessness among Veterans increased by 7.4% nationwide. Texas had the third largest percentage increase in homeless Veterans from 2022 to 2023 at 19%.[19] Figure 2-25 highlights the clear demographic differences between veterans and non-veterans. Texas veterans are significantly more likely to be male, White, Non-Hispanic, and have a disability.

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[19] U.S. Department of Housing and Urban Development. (2023, December). The 2023 Annual Homeless Assessment Report (AHAR) to Congress.

**Figure 2-25: Demographics of Texas Veterans, 2017-2021**

| | Total | % of Total | Veterans | % of Veterans | Non-Veterans | % of Non-Veterans |
|---|---|---|---|---|---|---|
| **Population 18 and Over** | 21,313,838 | | 1,426,641 | | 19,887,197 | |
| **Male** | 10,509,772 | 49.30% | 1,266,644 | 88.80% | 9,243,128 | 46.50% |
| **Female** | 10,804,066 | 50.70% | 159,997 | 11.20% | 10,644,069 | 53.50% |
| **White Alone** | 13,982,127 | 65.60% | 1,048,423 | 73.50% | 12,933,704 | 65.00% |
| **Black or African American Alone** | 2,578,033 | 12.10% | 208,238 | 14.60% | 2,369,795 | 11.90% |
| **Asian Alone** | 112,089 | 0.50% | 8,492 | 0.60% | 103,597 | 0.50% |
| **American Indian or Alaskan Native** | 1,113,431 | 5.20% | 19,274 | 1.40% | 1,094,157 | 5.50% |
| **Native Hawaiian or Other Pacific Islander** | 18,835 | 0.10% | 2,564 | 0.20% | 16,271 | 0.10% |
| **Some other Race** | 1,450,467 | 6.80% | 43,760 | 3.10% | 1,406,707 | 7.10% |
| **Two or More Races** | 2,058,856 | 9.70% | 95,890 | 6.70% | 1,962,966 | 9.90% |
| **Hispanic or Latino** | 7,792,227 | 36.60% | 287,025 | 20.10% | 7,505,202 | 37.70% |
| **White, non-Hispanic** | 9,404,192 | 44.10% | 874,833 | 61.30% | 8,529,359 | 42.90% |
| **Disabled** | 2,911,732 | 14.00% | 407,995 | 29.10% | 2,503,737 | 12.90% |

Source: U.S. Census Bureau American Community Survey 5 Year Estimates, 2017-2021, Table S2101.

# Chapter 3 - Regional Analysis

## Section Overview

This Chapter provides a regional level analysis of information presented in Chapter 2, Statewide Analysis, based on the Texas Department of Housing and Community Affairs' (TDHCA) 13 State Service Regions. It should be noted that the regions analyzed in this chapter are unique to TDHCA. Other state agencies administering HUD CPD funds in Texas have their own regional distribution and coverage of the state in the administration of their programs. For the sake of clarity and simplicity, TDHCA's service regions are used throughout this chapter.

This section will provide demographic, economic, and housing information on the State, much like Chapter 2, but at the more detailed, regional level. These regional analyses allow a more nuanced look at one of the largest states in the country and allow for variation that may exist between parts of the state.

The primary data sources for this chapter are the American Community Survey (ACS), Comprehensive Housing Affordability Strategy data (CHAS), the Texas Demographic Center (TDC), and the United States Census Bureau's On the Map data tool (On the Map). Other data sources are used infrequently and may include TDHCA-housed databases. Because of the size and scope of the state of Texas as well as the prevalence of geographically large, but sparsely populated areas of Texas, the State will use the United States Office of Management and Budget's Metropolitan Statistical Areas (MSA) as a proxy for urban and rural.

One limitation of the available data is that the definitions of "disability" used by the data sets is not identical to the definition given in the Fair Housing Act (FHA) regulations:

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

*protects persons who have a record of such an impairment, or are regarded as having such an impairment.*"[20]

The impact of this limitation is not immediately clear, as estimates of the number of Americans with disabilities varies between sources. The actual number of Texans with a disability is unknown and where practicable, this document will mostly lean on two sources of data on rates of disability: the U.S. Census Bureau's definition and self-reported disability status in TDHCA-monitored properties, via the Annual Owner's Compliance Report (AOCR) as required by Tex. Gov't Code §2306.0724 and 10 TAC §10.607.

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[20] The Department of Justice. "The Fair Housing Act", updated June 22, 2023.

# Region 1—"High Plains"

Point of Reference Cities: Amarillo, Lubbock

## Geo-Demographic Background

The High Plains Region is a primarily rural region of communities with diverse economies based around agriculture and ranching. The two major cities, Amarillo and Lubbock, contain most of the region's population. These cities make up the primary educational, cultural, and economic hubs of the High Plains Region. Both cities arose as centers of cotton and cattle markets. Helium production, sorghum, corn, wheat and soybean farming, and meat packing are also major industries in the region. In recent years, Amarillo and Lubbock have experienced moderate population growth, while Non-Metro counties in the region are seeing mostly population stagnation and even decline.

**The vast majority of residents in Region 1 identify their race and ethnicity as White, non-Hispanic, although this is shifting due to growth in the Hispanic population. Lower-income minority citizens live throughout the region in both small agricultural towns and in clusters in Amarillo and Lubbock.**

Figure 3-1 displays TDHCA Region 1 and the counties it contains.

**\*\*\*For all figure links cited below, data for the corresponding Region is visualized.To highlight a different Region or multiple Regions, use the Region drop down located on the right hand side of the Tableau mapping window. Check only the box of the Region(s) you would like to view.\*\*\***

**\*\*Some of the figures below are maps that contain multiple layers. To toggle between layers, click on the layers icon in the upper left-hand corner of the sheet (the icon directly below the search icon) and check the layer you would like to view. Only the tooltip for the top-most layer is viewable, so checking one layer at a time is optimal.\*\***

**Figure 3-1: <span style="color:#C0392B;text-decoration:underline">Texas Counties in TDHCA Service, Region 1</span>**

Figure 3-2 displays the population projections of Texas by race and ethnicity as a percentage of the population of Region 1 from 2010 through 2050. Race and ethnicity are combined for population projections. All persons identified as Hispanic or Latino, regardless of race, are categorized as Hispanic or Latino. Those identified as Non-Hispanic or Latino are categorized depending on their race. All races besides White and Black or African American have been combined into the 'Other' category due to the methodology and reporting employed by the Texas Demographic Center.

Unlike the state as a whole, Region 1 is majority White, non-Hispanic or Latino, rather than majority-minority, meaning that minority populations together are greater than 50% of the state population as a whole. However, just like the rest of the state, the population is looking at a dramatic shift over the next several decades. Region 1 is projected to become a majority-minority region by 2030, and by 2050 the area will have a Hispanic majority. Unlike the rest of Texas, this area is not projected to experience explosive population growth. Instead, a modest growth rate of approximately 10% per decade is projected. Figure 3-2 shows the latest population growth estimates from the Texas Demographic Center.

**Figure 3-2:** Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 1, 2010 to 2050

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.[21]

## Race and Ethnicity

As described in the statewide analysis, in order to assist communities in identifying Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs), HUD developed a census tract-based definition of R/ECAPs[22]. The definition involves a racial/ethnic concentration threshold and a poverty threshold. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-White population of 50% or more. Regarding the poverty threshold, HUD defines neighborhoods of extreme poverty as census tracts where 40% or more of individuals are living at or below the federal poverty level. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. A neighborhood can be considered a R/ECAP if it has a poverty rate that exceeds 40% or if it is three or more times the average tract poverty rate for the Metropolitan or Micropolitan Statistical Area, whichever threshold is lower. Census tracts with this level of poverty that satisfy the racial/ethnic

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[21] The Texas Demographic Center's most recent Population Projections by Race and Ethnicity is based off 2018 data. According to the TDC this is, "Due to the delay in the release of the 2020 Decennial Census detailed demographic data and the changes implemented in the 2020 Decennial Census, such as the new measures to provide privacy protection as well as the changes in the race/ethnic questions and the processing, projections with demographic details, especially at the county level, are not available now. Further research is needed to produce reasonable, detailed projections by race/ethnicity. Contact TDC for questions."

[22] Affirmatively Furthering Fair Housing Data Documentation, Version 3.1, July 2016.

concentration threshold are deemed R/ECAPs. More detail on the definition and delineation of R/ECAPs can be found in Appendix: R/ECAPS. Figure 3-3 shows the R/ECAPS in Region 1.

The Diversity Index is a metric designed to measure how equally distributed races and ethnicities are in a particular area. The index ranges from zero to one, where zero represents an area where every person is the same race and ethnicity and a one would represent an area where every person is a different race and ethnicity. A higher diversity index score means that the area's racial and ethnic composition is evenly distributed between the racial and ethnic groups represented and a lower score means that there is a concentration of only a few racial and ethnic groups out of the total population in that area. For more information on the Diversity Index refer to the Statewide Analysis (Chapter 2) or Appendix: Diversity Index.

**Figure 3-3: Map of R/ECAPs, Region 1, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-4 shows the Diversity Index by census tract for Region 1. Census tracts for which no data were available are typically airports, military bases, or other sparsely inhabited or uninhabited areas.

**Figure 3-4: Diversity Index, Region 1, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

R/ECAPS in Region 1 are isolated within the urban cores of Amarillo and Lubbock. The racial and ethnic composition of Region 1 is somewhat evenly distributed, with only a handful of census tracts around Amarillo lacking diversity. The most diverse areas are concentrated in the two urban areas of Lubbock and Amarillo. Most of this diversity is binary, with White and Hispanic populations dominating the area, but there is also a small Black population.

## Household Characteristics

Figure 3-5 shows the family characteristics of Region 1 households.

**Figure 3-5: Household and Family Characteristics, Region 1, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

Region 1 has a lower rate of households with minors than the State of Texas overall. The average household size, average family household size, and nonfamily household size are similar to Texas as a whole.

## Income

Figure 3-6 displays the percentage of the regional population by household income category and race and ethnicity for Region 1. In order to analyze household income, HUD's Comprehensive Housing Affordability Strategy (CHAS) data will be used to present the race and ethnicity of Texas households by income category. The income categories used by CHAS are as follows:

- Extremely Low Income (ELI): at or below 30% Area Median Family Income (AMFI);
- Very Low Income (VLI): greater than 30% but less than or equal to 50% AMFI;
- Low Income (LI): greater than 50% but less than or equal to 80% AMFI;
- Moderate Income (MI): greater than 80% but less than or equal to 100% AMFI; and
- Greater than 100% AMFI.

Race and ethnicity are considered separately in the following data; persons who identified as Hispanic or Latino are included both in their identified race category and under Hispanic or Latino.

Overall, Region 1 aligns closely with the state's household income distribution by race and ethnicity. Nearly two thirds of Black or African American households in Region 1 have incomes less than or equal to 80% AMFI. Region 1 has the third highest rate of Black or African American households that are ELI. Over one quarter of Black or African American households in Region 1 have incomes at or below 30% AMFI. This is only slightly greater than the proportion of Black or African American households with incomes greater than 100% AMFI. Hispanic households have the second highest percentage of households with incomes at or below 80% AMFI.

**Figure 3-6:** **Household Income Category by Race and Ethnicity, Region 1, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 1, 12.6% has a disability, which is slightly higher than the state's rate of 11.4%. Figure 3-7 shows prevalence of disability by the type of disability in Region 1, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 3-7:** Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 1, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810

Figure 3-8 shows the percent of the civilian non-institutionalized population of persons with a disability in Region 1 by gender and age. The higher rates of disability in Region 1 compared to the state are reflected in higher rates of disability among both men and women.

**Figure 3-8:** Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 1, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-9 shows the percent of the civilian non-institutionalized population of persons with a disability in Region 1 by race and ethnicity. Race and ethnicity are considered separately in the following data; persons who identified as Hispanic or Latino are included both in their identified race category and under Hispanic or Latino.

**Figure 3-9:** Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 1, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 1 has a slightly higher overall poverty rate compared to the state as well as higher rates of individuals living below 150% and 200% of poverty. Figure 3-10 shows the prevalence of poverty in Region 1 by poverty level.

**Figure 3-10:** Poverty Rates by Poverty Level, Region 1, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-11 shows the percent of individuals under the poverty line, or 100% of the federal poverty level, in Region 1 by age, gender, and race and ethnicity. Race and ethnicity are considered separately in the following data; persons who identified as Hispanic or Latino are included both in their identified race category and under Hispanic or Latino. Compared to the state, poverty in Region 1 is more heavily concentrated among Black or African American individuals and other racial minority groups, including Asian individuals and Hawaiian and Other Pacific Islander individuals.

**Figure 3-11: Poverty Rates by Age, Gender, Race and Ethnicity, Region 1, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

The Census Bureau's On the Map Tool provides data at the census block level on the travel distance from work to home and home to work for individuals. This data provides information on transportation needs and jobs proximity.

Figure 3-12 and Figure 3-13: Job Counts by Distance between Work Census Block and Home Census Block, Amarillo CBSA, TX, 2021 show the share of total jobs (job counts) and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Amarillo, TX Core Based Statistical Area (CBSA). Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 3-12: Share of Job Counts by Distance between Work Census Block and Home Census Block, Amarillo CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov

**Figure 3-13: Job Counts by Distance between Work Census Block and Home Census Block, Amarillo CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-14 and Figure 3-15 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Lubbock, TX CBSA. A majority of job holders working in Region 1 live within 10 miles of their work. There is a group who travels more than 50 miles for work, but it is possible that this is simply transfer between Lubbock and Amarillo. However, it is more likely that people from surrounding communities commute into the CBSA for work.

**Figure 3-14: Share of Job Counts by Distance between Work Census Block and Home Census Block, Lubbock CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov

**Figure 3-15:** **Job Counts by Distance between Work Census Block and Home Census Block, Lubbock CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-16 shows the employment and living situation of individuals in each county of Region 1. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There is a high degree of mobility in and out of counties in Region 1.

**Figure 3-16:** **Employment and Living Situations, Counties in Region 1, 2021**

Source: On The Map data, 2021, with out of state employment data excluded.

Figure 3-17 shows the mean travel time to work for counties in Region 1. Average commute times do not vary widely across counties within the region. Most individuals have commutes that are less than 20 minutes.

**Figure 3-17:** **Mean Travel Time to Work, Counties in Region 1, 2017 to 2021**

Source: Commuting to work data from ACS, 2017-2021 5YR estimates, Table S0801.

## Housing Profile

HUD's Comprehensive Housing Affordability Strategy (CHAS) data include information on households experiencing housing problems. The four factors included in the HUD definition of housing problems can be used to analyze local housing markets and develop strategies for meeting housing challenges. These factors include households lacking complete kitchen facilities, households lacking complete plumbing facilities, cost burdened households, and overcrowded households. The State also analyzes data from the ACS to look at the age of the housing stock in the region, which can be useful in determining the condition of housing units and as a measure of housing unit growth. Figure 3-18 shows the average age of housing stock by county in Region 1 as a percentage of the total housing stock.

**Figure 3-18:** **Age of Housing Stock by County, Region 1, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.
Note: Percentages may not add to 100% due to rounding.

Region 1 has some of the oldest stock in the state, with some counties having more than 70% of their housing units being 49 years old or more.

In all regions, the majority of ELI households and VLI renter households experience one or more of the housing problems identified by HUD. VLI renter households actually have higher rates of housing problems than ELI renter households for all regions. In many regions, the majority of VLI owner households and LI households also experience one or more housing problems. Renter households in all income categories are more likely to experience housing problems than owner households in the same categories, and households in a Metro county are more likely to experience housing problems than households in a Non-Metro county. Region 1 has the second lowest rate of households experiencing at least one problem for owner households. Figure 3-19 shows households in Region 1 experiencing one or more housing problems.

**Figure 3-19: Percent of Households with One or More Housing Problems, Region 1, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Figure 3-20 shows renter and owner households in Region 1 that lack complete plumbing and/or kitchen facilities. Lacking complete plumbing and/or kitchen facilities is an indication of physical inadequacies in housing. While this is not a complete measure of physical inadequacy, the lack of plumbing and/or kitchen facilities can serve as a strong indication of one type of housing inadequacy.

**Figure 3-20: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 1, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Only a small percentage of total Texas households lack complete plumbing and/or kitchen facilities. With a few exceptions, the lower the household income, the higher the chance of that household lacking plumbing and/or kitchen facilities. Renter households are more likely to lack plumbing and/or kitchen facilities than owner households. Rates for households in Metro and Non-Metro counties have less of a noticeable pattern and vary from region to region.

Figure 3-21 shows renter and owner households in Region 1 that are cost burdened. Cost burdened households spend more than 30% of their monthly income on housing costs, including utilities. When so much is spent on housing, other basic household needs may suffer.

Housing cost burden is a serious issue that affects the individuals participating in a great number of our programs. For all regions, cost burden makes up the vast majority of housing problems that owner and renter households encounter. The majority of ELI households and VLI renter households in all regions experience housing cost burden. In all regions, rates of housing cost

burden decrease as income increases. While in general ELI, VLI, and LI renter households are more likely to experience housing cost burden than owner households in the same income categories, owner households with incomes greater than 80% AMFI are more likely to experience housing cost burden than renter households in the same income categories. With a few exceptions, housing cost burden affects households in Metro counties more significantly than those in Non-Metro counties. Region 1 has relatively low rates of housing cost burden, though Metro county renter households are more heavily affected by housing cost burden than other household types.

**Figure 3-21: Percent of Households Experiencing Cost Burden, Region 1, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Figure 3-22 shows renter and owner households in Region 1 that are overcrowded. Overcrowding occurs when a residence accommodates more than one person per each room in the dwelling. Overcrowding may indicate a general lack of affordable housing in a community where households have been forced to share space, either because other housing units are not available, or because the units available are too expensive.

**Figure 3-22: Percent of Households Experiencing Overcrowding, Region 1, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

With some exceptions, overcrowding is a more prevalent issue than households lacking kitchen or plumbing facilities. The problem of overcrowding is generally more prevalent in lower income households, but regions follow this pattern less than with other housing problems. VLI households tend to have higher rates of overcrowding than ELI households, and in some regions LI and MI households have higher overcrowding rates than households in lower income categories. Owner households with incomes greater than 100% AMFI have the lowest rates of overcrowding across all regions with very few exceptions. Region 1 has relatively low rates of overcrowding compared to other regions, though rates are higher in Non-Metro than in Metro counties. Owner households with incomes greater than 100% AMFI in Metro counties have the lowest rates of overcrowding in Region 1.

Figure 3-23 shows the average housing costs in Region 1. Housing costs in Region 1 are lower than in most other regions.

**Figure 3-23: Average Housing Costs, Region 1, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Figure 3-24 shows the number of bedrooms in renter and owner occupied housing units with complete plumbing and kitchen facilities in Region 1. A higher concentration of 1 bedroom units for rent may contribute to the housing problem of overcrowding, and may be further exacerbated by the prevalence of cost burden. ELI and VLI households may not be able to afford units with enough bedrooms for the household's size.

**Figure 3-24: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 1, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

The breakdown of tenure and number of bedrooms in Region 1 is relatively close to state figures. Like all state service regions, the most prevalent housing type is owner occupied units with 3 or more bedrooms and the rarest housing type are 0 or 1 bedroom owner occupied units. Region 1 has the second lowest percentage of owner occupied units with 0 or 1 bedrooms, behind Region 3. Figure 3-25 maps the active multifamily properties in Region 1 participating in TDHCA programs.

**Figure 3-25: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 1, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county. A majority of TDHCA assisted properties in Region 1 are clustered in and around Amarillo, which is in Potter and Randall counties, and Lubbock, which is in Lubbock County, with some pockets in outlying counties around smaller cities.

# Region 2—"Northwest Texas"

**Point of Reference Cities:** Abilene, Wichita Falls, Brownwood

## Geo-Demographic Background

Historically, the Northwest Region was an agricultural and livestock-based area, well positioned along railroad and cattle drive routes. Settlers came into the region to farm and raise cattle. The City of Abilene began as a stopping and shipping point for cattle on the Texas and Pacific Railway. In the mid-20th century, the discovery of oil in the southwest of the region boosted the regional economy. Wichita Falls, located on the border of Texas and Oklahoma, began as a railroad depot town.

There are three universities near Abilene. The region is predominantly White, non-Hispanic, with clusters of Black or African American individuals and other minority populations in the cities, especially Abilene and Wichita Falls. Figure 3-26 shows the counties in TDHCA Service Region 2.

**Figure 3-26: Counties in TDHCA Service, Region 2**

Region 2 is anomalous in the state of Texas, as it is the only region projected to remain majority White for the next 30 years, though the percentage of the population identified as White will decrease. Region 2 is the only region with a projected stable, as opposed to decreasing, Black or African American population from 2010 to 2050. Figure 3-27 shows the population projections for Region 2.

**Figure 3-27: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 2, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-28 shows the R/ECAPs in Region 2.

**Figure 3-28: Map of R/ECAPs, Region 2, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-29 shows the Diversity Index by census tract for Region 2.

**Figure 3-29: Diversity Index, Region 2, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

R/ECAPS in Region 2 are specifically located only in the urban core of Wichita Falls and Brownwood. The majority of Region 2 has a low diversity index value. This is not surprising considering the regional population is nearly 70% White. The cities of Region 2, primarily Abilene and Wichita Falls, as well as some rural tracts in the western area of the region, do have census tracts with high diversity index values.

## Household Characteristics

Figure 3-30 shows the household characteristics of Region 2 households. Region 2 has one of the lowest average family household sizes of all regions as well as the lowest rate of households with a minor.

**Figure 3-30: Household and Family Characteristics, Region 2, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

## Income

Figure 3-31 displays the percentage of the regional population by household income category and race and ethnicity for Region 2. Overall, Region 2 aligns closely with the state's household income category distribution. 41.4% of Black or African American households are at or below 50% AMFI, and over 70% have incomes less than or equal to 100% AMFI. Hispanic households are also more likely to have incomes less than or equal to 100% AMFI, but to a lesser extent than Black or African American households. More than 30% of Hispanic households have incomes less than or equal to 50% AMFI, and more than 65% have incomes less than or equal to 100% AMFI.

**Figure 3-31: Household Income Category by Race and Ethnicity, Region 2, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 2, 16.9% has a disability, which is the second highest after Region 5. Compared to other regions, Region 2 has the highest rate of disability in Metro counties at 16.3%.

Figure 3-32 shows the prevalence of disability and disability types in Region 2, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. For the region as a whole and in both Metro and Non-Metro counties there is a higher rate of every type of disability compared to statewide rates.

**Figure 3-32: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 2, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-33 shows the percent of the civilian non-institutionalized population with a disability in Region 2 by gender and age. After Region 5, Region 2 has the highest rate of disability among both males and females.

**Figure 3-33: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 2, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-34 shows the percent of the civilian non-institutionalized population with a disability in Region 2 by race and ethnicity. Higher rates of disability among almost all races and ethnicities is consistent with the higher overall rate of disability in Region 2 compared to the state and other regions.

**Figure 3-34: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 2, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 2 has slightly higher rates of poverty than the state, but overall aligns closely with state levels. Figure 3-35 shows the prevalence of poverty in Region 2 by poverty level.

**Figure 3-35: Poverty Rates by Poverty Level, Region 2, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-36 shows the percent of individuals under the poverty line, or 100% of the federal poverty level, in Region 2 by age, gender, and race and ethnicity. Across age and gender, Region 2 aligns closely with the state. Compared to the state, poverty in Region 2 is more heavily concentrated among Black or African American individuals and other racial minority groups, including Asian, Hawaiian and Other Pacific Islander, Some Other Race, and two or more races. Compared to other regions, Region 2 has the one of the highest rates of poverty among Black or African American individuals at 28.8%. By population, Region 2 is the smallest region, but it also has some of the highest rates of poverty among racial and ethnic minority groups.

**Figure 3-36: Poverty Rates by Age, Gender, Race and Ethnicity, Region 2, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-37 and Figure 3-38 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Abilene, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 3-37:** Share of Job Counts by Distance between Work Census Block and Home Census Block, Abilene CBSA, TX, 2021

**Figure 3-38:** Job Counts by Distance between Work Census Block and Home Census Block, Abilene CBSA, TX, 2021

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-39 and Figure 3-40 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Wichita Falls, TX CBSA. In Region 2, more than half of individuals working in the Abilene and Wichita Falls CBSAs live within ten miles of their work. There is a large group of individuals who travel more than 50 miles, over one in four job holders in the Abilene CBSA and one in five in the Wichita Falls CBSA. This share may be due to the fact that there are only three Metro counties in the region and persons in Non-Metro counties have to commute to the city for work.

**Figure 3-39:** Share of Job Counts by Distance between Work Census Block and Home Census Block, Wichita Falls CBSA, TX, 2021

**Figure 3-40:** Job Counts by Distance between Work Census Block and Home Census Block, Wichita Falls CBSA, TX, 2021

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-41 shows the employment and living situation of individuals in each county of Region 2. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There is a high degree of mobility in and out of counties in Region 2. Two counties, Taylor County (Abilene, TX) and Wichita County (Wichita Falls, TX), account for approximately half of the entire region's jobs.

**Figure 3-41:** Employment and Living Situations, Counties in Region 2, 2021

Source: On the Map data, 2021, with out of state employment data excluded.

Figure 3-42 shows the mean travel time to work for counties in Region 2. Average commute times do not vary widely across counties within the region. Most individuals have commutes that are less than 25 minutes, with many counties having mean travel times to work under 20 minutes.

**Figure 3-42:** Mean Travel Time to Work, Counties in Region 2, 2017 to 2021

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 3-43 shows the average age of housing stock by county in Region 2 as a percentage of the total housing stock.

**Figure 3-43: Age of Housing Stock by County, Region 2, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Much like Region 1, the majority of Region 2's housing stock is 54 years old or more.

Figure 3-44 shows households in Region 2 experiencing one or more housing problems.

**Figure 3-44: Percent of Households with One or More Housing Problems, Region 2, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Households in Metro counties in Region 2 are more likely than households in Non-Metro counties to experience at least one housing problem. The lower the household's income, the more likely they are to experience at least one housing problem. Region 2 has the lowest rates of housing problems for owner households with incomes greater than 80% AMFI (MI and above) and VLI renter households among all regions. Region 2 also has the lowest rate of households experiencing at least one problem for owner households and the lowest rate for renter households. Figure 3-45 shows renter and owner households in Region 2 that lack complete plumbing and/or kitchen facilities. Of the household problems, lacking kitchen and/or plumbing facilities is not a prevalent issue in this region or any region.

**Figure 3-45: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 2, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Figure 3-46 shows renter and owner households in Region 2 that are cost burdened.

**Figure 3-46: Percent of Households Experiencing Cost Burden, Region 2, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

The majority of household types in Region 2 have low rates of cost burden relative to the state average. Figure 3-47 shows renter and owner households in Region 2 that are overcrowded.

**Figure 3-47: Percent of Households Experiencing Overcrowding, Region 2, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Region 2 has the lowest rates of overcrowding for renter and owner households compared to other regions. ELI owner households in Region 2 are more likely to lack complete plumbing and kitchen facilities than they are to experience overcrowding, one of four regions where households have higher rates of lacking facilities than overcrowding in a particular income category. Figure 3-48 shows the average housing costs in Region 2.

**Figure 3-48: Average Housing Cost, Region 2, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Similar to Region 1, Region 2 tends to have lower monthly housing costs than the regions of the state with a larger Metro population.

Figure 3-49 shows the number of bedrooms in renter and owner occupied housing units in Region 2.

**Figure 3-49: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 2, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Region 2 has the highest percentage of owner occupied units with 2 bedrooms and the lowest percentage of owner occupied units with 3 or more bedrooms among all regions. As a result, the tenure and unit size profile for owner occupied units in Region 2 varies from state percentages more than any other region due to the high share of 2 bedroom and low share of 3 bedroom owner occupied units. Figure 3-50 maps the active multifamily properties in Region 2 participating in TDHCA programs.

**Figure 3-50: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 2, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column at the linked figure titled "Active Property Unit Count" reflects the total units at the properties in a county (both subsidized and market rate) while the column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Properties are clustered primarily in Wichita, Taylor, and Brown counties, which contain Wichita Falls, Abilene, and Brownwood, respectively. A notable cluster is also visible in Colorado City in Mitchell County.

# Region 3—"Metroplex"

Point of Reference Cities: Dallas, Fort Worth, Denton

## Geo-Demographic Background

The Metroplex Region is the most populous region in the State, containing more than one-fourth of the state's entire population. A large number of corporate headquarters, information technology companies, energy companies, defense contractors, farming and ranching industries, and tourism activity support the region's economy.

Historical records indicate that the region began to gain population due to its position at the crossroads of north-south and east-west railroad lines. The region became the center of the oil and cotton industries. In the mid-20th century, Dallas became a convergence point from all directions within the U.S. interstate highway system. Dallas' status as a crossroads and transportation hub continues to this day with the Dallas-Fort Worth airport serving as a major economic generator.

Historically, the region was divided along racial and ethnic lines by major highways and geographic barriers. This institutional separation influenced settlement patterns in the area. The Metroplex area has also had a history of litigation surrounding fair housing.[23] New business center development, housing, and population growth have tended to be more rapid in the suburban areas north of Dallas and Fort Worth, while growth has tended to be weaker in the southern part of the region. Figure 3-51 shows the counties in TDHCA Service Region 3.

**Figure 3-51: Counties in TDHCA Service, Region 3**

Region 3 is already majority-minority, and is projected to continue to be majority-minority. Unlike other parts of the state, however, the Metroplex will maintain a high degree of racial and ethnic diversity, despite a shrinking White population. Almost all of the growth in the area is predicted to be among Hispanic residents, with some more modest increases among other minorities.

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[23] See State of Texas Analysis of Impediments, p. 13 and 14 (2003); State of Texas Plan for Fair Housing Choice: Analysis of Impediments, Section VI (2013); 2019 Analysis of Impediments did not examine local Fair Housing litigation.

**Figure 3-52: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 3, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

- Figure 3-53 shows the R/ECAPs in Region 3.

**Figure 3-53: Map of R/ECAPs, Region 3, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-54 shows the Diversity Index by census tract for Region 3. Census tracts for which no data were available are shown in white.

**Figure 3-54: Diversity Index, Region 3, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

R/ECAPs in Region 3 are spread throughout the urban centers of Dallas and Fort Worth, as well as in central Denton and Greenville. R/ECAPs in Dallas are primarily in the southeastern part of the city. The Diversity Index map indicates that the urban centers of Dallas and Fort Worth are more diverse, which is consistent with the definition of a R/ECAP and the Region 3 R/ECAP maps. The northwestern portion of Region 3 has a lower diversity index compared to the southeastern area of the region, suggesting less equitable distribution of diversity in the northwest.

## Household Characteristics

Figure 3-55 shows the household characteristics of Region 3 households.

**Figure 3-55: Household and Family Characteristics, Region 3, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

The household characteristics of Region 3 are closely aligned with the characteristics for the state as a whole. A greater percentage of female-headed households have a minor than male-headed households, and both are greater than the percentage of total households with a minor.

## Income

Figure 3-56 displays the percentage of the regional population by household income category and race and ethnicity for Region 3. Overall, Region 3 has a slightly lower percentage of households with incomes less than or equal to 50% AMFI. Approximately 35% of Black or African American households have incomes less than or equal to 50% AMFI, and two in three Black or African American households have incomes less than or equal to 100% AMFI. Approximately one third of Hispanic households have incomes less than or equal to 50% AMFI, and more than two thirds have incomes less than or equal to 100% AMFI. Region 3 has the highest rate of Hispanic households with incomes less than or equal to 100% AMFI, and only 31.2% of Hispanic households have incomes greater than 100% AMFI.

**Figure 3-56: Household Income Category by Race and Ethnicity, Region 3, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Region 3, along with Regions 6 and 7, has the lowest rates of disability among the civilian non-institutionalized population at less than 10%. This is likely due to these regions having large Metro county populations, where rates of disability are lower. Only 9.6% of the Metro population has a disability, while 14.8% of the Non-Metro population has a disability. Figure 3-57 shows the prevalence of disability and disability types in Region 3, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. For the region as a whole and in Metro counties there is a lower rate of every type of disability compared to statewide rates.

**Figure 3-57: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 3, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-58 shows the percent of the civilian non-institutionalized population with a disability in Region 3 by gender and age. Lower rates of disability in Region 3 compared to the state and to other regions are reflected in lower rates of disability among men, women, and children.

**Figure 3-58: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 3, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-59 shows the percent of civilian non-institutionalized population with a disability in Region 3 by race and ethnicity. Lower rates of disability across almost all races and ethnicities is consistent with the lower overall rate of disability in Region 3 compared to the state and other regions. As with other demographics, a higher rate of disability is seen in Non-Metro counties across almost all races and ethnicities.

**Figure 3-59: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 3, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 3 has lower rates of poverty than the state. Figure 3-60 shows the prevalence of poverty in Region 3 by poverty level.

**Figure 3-60: Poverty Rates by Poverty Level, Region 3, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-61 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 3 by age, gender and race and ethnicity. Across age, gender, and race and ethnicity, the poverty rate in Region 3 is slightly lower than statewide rates.

**Figure 3-61: Poverty Rates by Age, Gender, Race and Ethnicity, Region 3, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-62 and Figure 3-63 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Dallas-Fort Worth-Arlington, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. A similar share of job holders working in the Dallas-Fort Worth-Arlington CBSA drive less than 10 miles and between 10 to 24 miles to work, this may be due to the Dallas-Fort Worth-Arlington CBSA having such a large area.

**Figure 3-62: Share of Job Counts by Distance between Work Census Block and Home Census Block, Dallas-Fort Worth-Arlington CBSA, TX, 2021**

**Figure 3-63: Job Counts by Distance between Work Census Block and Home Census Block, Dallas-Fort Worth-Arlington CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-64 and Figure 3-65 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Sherman-Denison, TX CBSA. Job holders working in the Sherman-Denison CBSA have a wider distribution of distance traveled to work than in the Dallas-Fort Worth-Arlington CBSA, with greater than 50% more of its population commuting more than 50 miles to work. This may be due to people from surrounding communities, including from other states, commuting into the CBSA for work.

**Figure 3-64: Share of Job Counts by Distance between Work Census Block and Home Census Block, Sherman-Denison CBSA, 2021**

**Figure 3-65: Job Counts by Distance between Work Census Block and Home Census Block, Sherman-Denison CBSA, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-66 shows the employment and living situation of individuals in each county of Region 3.

**Figure 3-66: Employment and Living Situations, Counties in Region 3, 2021**

Source: On the Map data, 2021 with out of state employment data excluded.

Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There is a high degree of mobility in and out of counties in Region 3, with about the same number of job holders commuting to other counties for work as job holders that work and reside in the same county. Jobs in the region are heavily concentrated in the Dallas-Fort Worth-Arlington CBSA, as evidenced by the nearly 1,300,000 individuals who commute into Dallas County (Dallas) and the over 1,000,000 individuals who commute into Tarrant County (Fort Worth) for their jobs.

Figure 3-67 shows the mean travel time to work for counties in Region 3. Average commute times in Region 3 are higher than in most regions, with many over 30 minutes. This may be due to the fact that a majority of counties in the region are Metro counties and are more densely populated. Kaufman County and Hood County have the longest mean commute times at 35.7 and 33.7

minutes respectively. This trend is likely due to job holders commuting into the Dallas-Fort Worth area for work.

**Figure 3-67: Mean Travel Time to Work, Counties in Region 3, 2017 to 2021**

Source: Commuting to work data from ACS, 2017-2021 5YR estimates, Table S0801.

## Housing Profile

Figure 3-68 shows the average age of housing stock by county in Region 3 as a percentage of the total housing stock.

**Figure 3-68: Age of Housing Stock by County, Region 3, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Unlike TDHCA Service Regions 1 and 2, most of the housing stock in Region 3 is less than 54 years old, with some counties having 33% or more of their housing stock less than 23 years old. Figure 3-69 shows households in Region 3 experiencing one or more housing problems.

**Figure 3-69: Percent of Households with One or More Housing Problems, Region 3, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Households with incomes greater than 100% AMFI are substantially less likely to experience any type of housing problem, while most households with incomes less than or equal to 50% AMFI tend to experience at least one housing problem. ELI and VLI owner households in Region 3 are only second to Region 7 for rates of experiencing housing problems, and ELI and VLI renter households are also second. Figure 3-70 shows renter and owner households in Region 3 that lack complete plumbing and/or kitchen facilities.

**Figure 3-70: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 3, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Non-Metro households in Region 3 have higher rates than Metro households in general. Overall, Region 3 has low rates of households in all income categories lacking plumbing or kitchen

facilities compared to the rest of the state. Figure 3-71 shows renter and owner households in Region 3 that are cost burdened.

**Figure 3-71: Percent of Households Experiencing Cost Burden, Region 3, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Region 3 has high rates of cost burden for ELI and VLI households. Four out of 5 renter households with incomes at or below 50% AMFI are cost burdened, while over half of owner households in the same income category are cost burdened. Rates of cost burden for owner households with incomes greater than 50% AMFI are also higher than the majority of rates for other regions. Region 3 is one of four regions where a majority of VLI owner households experience cost burden and has the second highest rate of VLI owner cost burden behind Region 7. Compared to other regions with high levels of owner cost burden, renter cost burden is not as significant in Region 3. Figure 3-72 shows renter and owner households in Region 3 that are overcrowded.

**Figure 3-72: Percent of Households Experiencing Overcrowding, Region 3, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Region 3 has a particularly high rate of overcrowding for ELI owner households in Non-Metro counties—4.8% of ELI Non-Metro owner households in Region 3 experience overcrowding, third only to Regions 6 and 11. Overall, households with incomes less than or equal to 100% AMFI have higher rates of overcrowding in Region 3 compared to other regions, but households with incomes greater than 100% AMFI have very low rates of overcrowding. ELI, VLI, LI, and MI renter households in Metro counties have higher rates of overcrowding than those in Non-Metro counties, while the reverse is true for renter households with incomes greater than 100% AMFI. ELI owner households experience overcrowding at higher rates in Non-Metro counties, but VLI, LI, and MI owner households have higher rates in Metro counties. Figure 3-73 shows the average housing costs in Region 3.

**Figure 3-73: Average Housing Cost, Region 3, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Unlike Regions 1 and 2, the Metroplex has significantly higher costs of housing, especially for homeowners with a mortgage, who have costs that are more than twice that of Region 2. Figure 3-74 shows the number of bedrooms in renter and owner occupied housing units in Region 3.

**Figure 3-74:** Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 3, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Region 3 has the third highest percentage of renter occupied units with 0 or 1 bedrooms behind only Regions 6 and 7. Region 3 also has the second lowest percentage of renter units with 3 or more bedrooms and the highest percentage of owner units with 3 or more bedrooms among all regions, which might explain the difference between owner and renter overcrowding.

Figure 3-75 maps the active multifamily properties in Region 3 participating in TDHCA programs.

**Figure 3-75:** Map of Active Multifamily Properties Participating in TDHCA Programs, Region 3, 2023

Source: TDHCA, Central Database, data pull from June 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Unit Count" reflects the total units at the properties in a county (both subsidized and market rate) while the column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county. There is a heavy concentration of TDHCA units in the four most populous central counties of Region 3: Dallas County, Tarrant County, Denton County, and Collin County.

# Region 4—"Upper East Texas"

Point of Reference Cities: Tyler, Longview, Texarkana

## Geo-Demographic Background

The northeast corner of Texas is home to the East Texas Oil Field, which is the largest and most prolific oil reservoir in the contiguous United States. The area also includes abundant portions of the East Texas Timberlands Region, with significant harvesting of pinewood and hardwood. Beef cattle, horses, hay, and nursery crops are among the main agricultural products in the area, and oil and gas extraction firms, educational and medical facilities, and retail shops employ many of the workers.

The region's largest city is Tyler, which began as a railroad depot for the cotton trade. The region saw a boom with the discovery of oil in the 20th century, bringing more people, businesses, and development to the area. Tyler has become a medical center for the region. Roses are a quite lucrative product in Tyler as both a money crop and a tourist attraction. Figure 3-76 shows the counties in TDHCA Service Region 4.

**Figure 3-76: Counties in TDHCA Service, Region 4**

Region 4 is projected to not experience demographic change for longer than most other regions, remaining majority white for nearly the entire 3 decade span covered by the population projections. Furthermore, the region is not projected to experience the same rapid growth of its Hispanic population that the rest of the state is likely to experience for at least a decade. During this time frame, the region is expected to only minimally increase its total population. Figure 3-77 shows the population projections for Region 4.

**Figure 3-77: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 4, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-78 shows the R/ECAPs in Region 4.

**Figure 3-78: Map of R/ECAPS, Region 4, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-79 maps the Diversity Index in Region 4. Census tracts for which no data were available are shown in white.

**Figure 3-79: Diversity Index, Region 4, 2021**

R/ECAPs in Region 4 are concentrated in the city centers of the region's smaller population centers such as Tyler, Texarkana, and Paris. These areas are small and dispersed. Areas with a high Diversity Index value, similarly to R/ECAPs, are concentrated in the center of smaller population centers spread throughout the region. Notably the area north of Tyler and the area surrounding Mount Pleasant have relatively high Diversity Index values.

## Household Characteristics

Region 4 household characteristics appear in Figure 3-80.

**Figure 3-81: Household and Family Characteristics, Region 4, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

Household characteristics of Region 4 resemble the state in general. The average household size, average family household size, and the percentage of total households with a minor are all below the figures for the state as a whole.

## Income

Figure 3-82 displays the percentage of the regional population by household income category and race and ethnicity for Region 4. Overall, Region 4 aligns closely with the state's household income category distribution by race and ethnicity. Over 60% of Black or African American households in Region 4 have incomes less than or equal to 80% AMFI. Almost one in four Black or African American households are ELI.

**Figure 3-82: Household Income Category by Race and Ethnicity, Region 4, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 4, 15.1% has a disability, which is relatively higher than the statewide rate of 11.4%. Figure 3-83 shows the prevalence of disability and disability types in Region 4, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Unlike other regions,

there is not a significant difference in the rates of specific disability types between the Metro and Non-Metro counties.

**Figure 3-83: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 4, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-84 shows the percent of the civilian non-institutionalized population with a disability in Region 4 by gender and age.

**Figure 3-84: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 4, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-85 shows the percent of civilian non-institutionalized population with a disability in Region 4 by race and ethnicity. Higher rates of disability across almost all races and ethnicities is consistent with the higher overall rate of disability in Region 4 compared to the state and most other regions.

**Figure 3-85: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 4, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 4 has slightly higher rates of poverty than the state, but overall aligns closely with state levels. Figure 3-86 shows the prevalence of poverty in Region 4 by poverty level.

**Figure 3-86: Poverty Rates by Poverty Level, Region 4, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701

Figure 3-87 shows the percent of individuals under the poverty line, or 100% of the federal poverty level, in Region 4 by age, gender, and race and ethnicity. Across age and gender, Region 4 aligns closely with the state.

**Figure 3-87: Poverty Rates by Age, Gender, Race and Ethnicity, Region 4, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701

## Employment

Figure 3-88 and Figure 3-89 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Longview, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 3-88: Share of Job Counts by Distance between Work Census Block and Home Census Block, Longview CBSA, TX, 2021**

**Figure 3-89: Job Counts by Distance between Work Census Block and Home Census Block, Longview CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-90 and Figure 3-91 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Texarkana, TX-AR CBSA.

**Figure 3-90: Share of Job Counts by Distance between Work Census Block and Home Census Block, Texarkana CBSA, TX-AR, 2021**

**Figure 3-91: Job Counts by Distance between Work Census Block and Home Census Block, Texarkana CBSA, TX-AR, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-92 and Figure 3-93 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Tyler, TX CBSA. Across the three CBSAs in Region 4, a majority of job holders drive less than 10 miles to work, but at least 20% of job holders are commuting greater than 50 miles to work.

**Figure 3-92: Share of Job Counts by Distance between Work Census Block and Home Census Block, Tyler, TX, 2021**

**Figure 3-93: Job Counts by Distance between Work Census Block and Home Census Block, Tyler, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-94 shows the employment and living situation of individuals in each county of Region 4. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There

is a high degree of mobility in and out of counties in Region 4. Jobs in Region 4 are most prevalent in Smith County (Tyler, TX) and Gregg County (Longview, TX).

**Figure 3-94: Employment and Living Situations, Counties in Region 4, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

Figure 3-95 shows the mean travel time to work for counties in Region 4. Average commute times vary widely across counties within the region, ranging from 17.8 minutes to 36.8 minutes. Region 4 experiences fairly high commute times in counties that surround the Metro counties, likely due to job holders in Non-Metro counties commuting into the job centers in Smith County (Tyler, TX), Gregg and Harrison Counties (Longview, TX), and Bowie County (Texarkana, TX).

**Figure 3-95: Mean Travel Time to Work, Counties in Region 4, 2017 to 2021**

Source: Commuting to work data from ACS, 2017 to 2021 5YR estimates, Table S0801.

## Housing Profile

Figure 3-96 shows the average age of housing stock by county in Region 4 as a percentage of the total housing stock.

**Figure 3-96: Age of Housing Stock by County, Region 4, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Region 4 has a fairly uniform mix of housing unit ages. A few counties have significantly older stock, but unlike Region 1 and 2, no county in Region 4 has housing units that are a majority 54 or more years old.

**Figure 3-97: Percent of Households with One or More Housing Problems, Region 4, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Region 4 has fewer households experiencing housing problems than the statewide rate. Figure 3-98 shows renter and owner households in Region 4 that lack complete plumbing and/or kitchen facilities. MI renter households in Metro counties as well as VLI renter households in Metro counties have notably high rates of units lacking plumbing or kitchen facilities.

**Figure 3-98:** Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 4, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Figure 3-99 shows renter and owner households in Region 4 that are cost burdened.

**Figure 3-99:** Percent of Households Experiencing Cost Burden, Region 4, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Region 4 has low rates of cost burden compared to the state as a whole and other regions. Somewhat high rates in Metro counties are balanced by low rates in Non-Metro counties. Figure 3-100 shows renter and owner households in Region 4 that are overcrowded.

**Figure 3-100:** Percent of Households Experiencing Overcrowding, Region 4, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Region 4 has relatively low rates of overcrowding, particularly for ELI and VLI renters in Metro counties. Rates of overcrowding among these household types are nearly half the rates of Region 6. Figure 3-101 shows the average housing costs in Region 4.

**Figure 3-101:** Average Housing Costs, Region 4, 2021

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Like other less densely-populated regions, the cost of housing in Region 4 is low compared to denser areas.

Figure 3-102 shows the number of bedrooms in renter and owner occupied housing units in Region 4.

**Figure 3-102:** Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 4, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Region 4 varies the most from state figures for tenure and unit size, particularly the renter occupied unit profile. Region 4 has the second lowest percentage of renter occupied units with 0 or 1 bedrooms, the third highest percentage of renter occupied units with 2 bedrooms, and the third highest percentage of renter occupied units with 3 or more bedrooms among all regions.

Region 4 has a large proportion of owner as opposed to renter occupied units compared to other regions. Of Region 4 housing units, 66.2% are owner occupied units with 3 or more bedrooms, the highest percentage among all regions.

Low rates of overcrowding in Region 4 are likely due to the availability of units with 3 or more bedrooms, and an average household size lower than the state average. The lack of zero or one bedroom units may be a driving force behind cost burden, as people are forced to obtain a larger unit size, therefore increasing the price. Figure 3-103 maps the active multifamily properties in Region 4 participating in TDHCA programs.

**Figure 3-103: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 4, 2023**

Source: TDHCA, Central Database, data pull from June 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Unit Count" reflects the total units at the properties in a county (both subsidized and market rate) while the column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Active multifamily properties participating in TDHCA programs are fairly well dispersed throughout the region, which is in line with the population dispersion.

# Region 5—"Southeast Texas"

**Point of Reference Cities:** Beaumont, Port Arthur, Nacogdoches

## Geo-Demographic Background

Also known as "Deep East," this southeastern region shares a border with Louisiana and is populated primarily with small and medium sized towns. Region 5 also contains the Beaumont-Port Arthur MSA. Beaumont, Port Arthur, and neighboring Orange form the cities of the once-revered "Golden Triangle," so-called following the discovery of considerable oil reserves at Spindletop Hill in 1901. Beaumont is now an important shipping point, petrochemical producer, and hospital and nursing home center. The region's economy includes logging in the wooded areas and chemical production, in addition to oil and gas production and refineries in the southern part of the region. One of only three federally recognized tribes that reside in Texas, the Alabama-Coushatta Tribe, resides in Polk County.

**Figure 3-104: Counties in TDHCA Service, Region 5**

Like its neighbor Region 4, Region 5 is projected to have slow demographic shifts over the coming decades. This region is currently one fifth Black and African American and only 16% Hispanic. It is the only region in the state that has fewer Hispanics or Latinos than Blacks or African Americans. Figure 3-105 shows population projections for Region 5.

**Figure 3-105: Population Projections by Race and Ethnicity as a Percentage of the Population, Region 5, 2010 to 2050**

## Race and Ethnicity

Figure 3-106 shows the R/ECAPs in Region 5.

**Figure 3-106: Map of R/ECAPS, Region 5, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-107 shows the Diversity Index by census tract for Region 5.

**Figure 3-107: Diversity Index, Region 5, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

Diversity is largely concentrated in the four main cities in the region, Beaumont, Port Arthur, Jasper, and Nacogdoches. The northern half of Polk County, where Corrigan is located, has a relatively high Diversity Index value compared to the rest of the Region's rural areas.

## Household Characteristics

Figure 3-108 shows the family characteristics of households in Region 5.

**Figure 3-108: Household and Family Characteristics, Region 5, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

The family characteristics of Region 5 are very similar to those of Region 4. Region 5 also has the third lowest average non-family household size among all regions.

## Income

Figure 3-109 displays household income by race and ethnicity for Region 5. Region 5 follows the same trend as most other regions in the state, with more than a quarter of African American households below 30% AMFI and seven out of ten African American households below the AMFI.

**Figure 3-109: Household Income Category by Race and Ethnicity, Region 5, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Compared to other regions, Region 5 has the highest percentage of disability amongst the civilian non-institutionalized population at 17.7%. Region 5 also has the highest rate of disability in Non-Metro counties, where nearly one in five individuals has a disability. Figure 3-110 shows prevalence of disability by disability type in Region 5, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. There is a significantly higher rate of ambulatory, hearing and cognitive disabilities in Region 5 compared to the statewide average. At 6.4%, Region 5 has the highest rate of cognitive difficulties of any of the other regions and also has the highest rate of cognitive difficulties in Non-Metro counties at 7.6%.

**Figure 3-110: Percent of Civilian Non-Institutionalized Population with Disability by Disability Types Region 5, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-111 shows the percent of the civilian non-institutionalized population with a disability in Region 5 by gender and age. Region 5 has the highest rate of children aged 5-17 years with disabilities at 7.4%. Nearly one in ten children aged 5-17 years in the Non-Metro counties of the region has some type of disability.

**Figure 3-111: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 5, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-112 shows the percent of the civilian non-institutionalized population with a disability in Region 5 by race and ethnicity. Higher rates of disability among almost all races and ethnicities is consistent with the higher overall rate of disability in Region 5 compared to the state and other regions. With Region 5 having the highest rate of disability in the state, it also sees some of the highest rates across race and ethnicity with the exception of Hispanics or Latinos.

**Figure 3-112: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 5, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 5 has slightly higher rates of poverty than the state. Figure 3-113 shows the prevalence of poverty in Region 5 by poverty level.

**Figure 3-113: Poverty Rates by Poverty Level, Region 5, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-114 shows the percent of individuals below the poverty line (100% poverty) in Region 5 by age, gender, and race and ethnicity. Across gender, Region 2 has a higher rate of females living in poverty compared to the state and compared to males within the same region. In Region 5, nearly 30% of Black and African American residents, more than 30% of American Indians and Alaskan Natives, more than 20% of Asians, and almost one in every four Hispanics or Latinos live below the poverty line. Compared to other regions, Region 5 has the highest poverty rate among American Indians and Alaskan Natives, more than double that of the state, which is likely attributed to the Alabama-Coushatta Indian Reservation being located in the region.

**Figure 3-114: Poverty Rates by Age, Gender, Race and Ethnicity, Region 5, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

**Employment**

Figure 3-115 and Figure 3-116 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Beaumont-Port Arthur, TX. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. More than half of job holders drive over 10 miles to work, with over one in four job holders driving over 50 miles to work.

**Figure 3-115:** **Share of Job Counts by Distance between Work Census Block and Home Census Block, Beaumont-Port Arthur CBSA, TX, 2021**

**Figure 3-116:** **Job Counts by Distance between Work Census Block and Home Census Block, Beaumont-Port Arthur CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-117 shows the employment and living situation for individuals in each county of Region 5. Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it. Jobs in the region are primarily located in Jefferson County, where a majority of the Beaumont-Port Arthur CBSA is located. There are a large number of individuals who are employed in the city they do not live in, which may be due to jobs primarily being in the Beaumont-Port Arthur CBSA, however, this could also be attributed to individuals who commute into nearby Region 6, or even across the border into Louisiana.

**Figure 3-117:** **Employment and Living Situations, Counties in Region 5, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

Figure 3-118 shows the mean travel time to work for counties in Region 5. Average commute times vary widely across counties within the region ranging from 20.7 minutes to 42.4 minutes. A majority of commute times in counties of Region 5 are greater than 25 minutes.

**Figure 3-118:** **Mean Travel Time to Work, Counties in Region 5, 2017 to 2021**

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 3-119 shows the age of housing stock in Region 5.

**Figure 3-119:** Age of Housing Stock by County, Region 5, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Region 5 primarily has housing units between 24 and 53 years old. Figure 3-120 shows the percent of households in Region 5 experiencing one or more housing problems by income category and housing tenure.

**Figure 3-120:** Percent of Households with One or More Housing Problems, Region 5, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Region 5 has the lowest rate of ELI owner households experiencing housing problems, the third lowest rate for ELI renter households, the lowest rate for VLI owner households, the second lowest rate for LI owner households, and the second lowest rate for MI owner households. Figure 3-121 shows renter and owner households in Region 5 lacking complete plumbing or kitchen facilities.

**Figure 3-121:** Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 5, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Households with incomes greater than 100% AMFI have relatively high rates of units lacking plumbing or kitchen facilities compared to other regions with higher rates in Metro counties for renters and owners. Figure 3-122 shows renter and owner households in Region 5 that are cost burdened.

**Figure 3-122:** Percent of Households Experiencing Cost Burden, Region 5, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Region 5, similarly to Region 4, has low rates of cost burden. Slightly higher rates in Non-Metro counties are offset by low rates in Metro counties. Figure 3-123 shows renter and owner households in Region 5 that are overcrowded.

**Figure 3-123: Percent of Households Experiencing Overcrowding, Region 5, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Overcrowding rates in Region 5 are very similar to rates in Region 4. Rates are very low, with a spike for MI renter households in Non-Metro counties. Rates are higher in Non-Metro counties with the exception of renter households with incomes greater than 100% AMFI.

**Figure 3-124: Average Housing Costs, Region 5, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Figure 3-124 shows the average housing costs in Region 5. Region 5, one of the regions with a larger Non-Metro population in the state, has much lower housing costs than regions with a larger Metro population. Figure 3-125 shows the number of bedrooms in renter and owner occupied households in Region 5.

**Figure 3-125: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 5, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

The tenure and unit size profile of Region 5 is close to that of Region 4. Region 5 has the second largest proportion of owner as opposed to renter occupied units among all regions behind Region 4. Of Region 5 housing units, 54.1% are owner occupied units with 3 or more bedrooms, a percentage higher than most regions. Figure 3-126 maps the active multifamily properties in Region 5 participating in TDHCA programs.

**Figure 3-126: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 5, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Unit Count" reflects the total units at the properties in a county (both subsidized and market rate) while the column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

The highest concentration of TDHCA multifamily properties is in Jefferson County, a local job center that contains the Beaumont-Port Arthur MSA. Other clusters of properties exist in Orange, Angelina, and Nacogdoches counties, which contain Orange, Lufkin, and Nacogdoches, respectively.

# Region 6—"Gulf Coast"

Point of Reference Cities: Houston, Galveston

## Geo-Demographic Background

The Gulf Coast region is an economically and demographically diverse region with a rich history. Due to the region's prime location along the Gulf of Mexico and the presence of natural ports, many European colonists claimed the area as their new home. The most sought-after part of the region was Galveston Island, as a trade port. The Republic of Texas temporarily established their capital in Galveston in 1836.

Today the region is dominated by the City of Houston. The fourth largest city in the country, Houston is a complex, international city with a healthy economy built on the oil and gas industry, chemical industry, aeronautics, and shipping. Houston's inner city is divided into six wards. It is the largest city in the U.S. without formal zoning regulations.

Though the city is very diverse overall, there are very distinct clusters of African American, Hispanic, and Asian communities within the city. The Houston suburbs are vast, sprawling far beyond the urban core, and are majority White. Houston's robust oil and gas industry supports many gas and chemical refineries near the coast and around the periphery of the Metro area. More affluent communities are generally located to the west and north of Houston, away from more industrial areas. Areas not yet included in the reaches of developing Houston have agricultural-based economies.

**Figure 3-127: Counties in TDHCA Service, Region 6**

Like Region 3 (the Dallas-Fort Worth Metroplex), Region 6 is already majority-minority with Hispanics making up the largest group in the region. The growth of the Hispanic population is projected to steadily increase, while the percentage of White, Non-Hispanic population is predicted to decline over the next 30 years. Overall, the region is experiencing and will continue to experience explosive population growth. Figure 3-128 shows population projections for Region 6.

**Figure 3-128: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 6, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-129 shows the R/ECAPs in Region 6.

**Figure 3-129: Map of R/ECAPS, Region 6, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-130 shows the Diversity Index by census tract for Region 6.

**Figure 3-130: Diversity Index, Region 6, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

The Diversity Index indicates that Houston has large areas of racial and ethnic concentrations throughout the urban core, including R/ECAPs. The more diversified areas are in the middle and outer rings around the city, as opposed to the downtown core, as well as in some outlying areas.

## Household Characteristics

Figure 3-131 shows the family characteristics of Region 6 households.

**Figure 3-131: Household and Family Characteristics, Region 6, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

Region 6 household characteristics closely mirror those of the rest of the state. Region 6 has a slightly higher rate of households with a minor than other parts of the state, and also has a larger than average family size, explaining some of the population growth.

## Income

Figure 3-132 displays the household income by race and ethnicity for Region 6. For both Hispanic and Black or African American households 33.7% are at or below 50% AMFI, while only about 16% of White households are at or below 50% AMFI and more than 70% of White households are at or above 80% AMFI. Region 6 experiences an income gap along racial and ethnic lines.

**Figure 3-132: Household Income Category by Race and Ethnicity, Region 6, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Region 6, along with Regions 3 and 7, has the lowest rates of disability among the civilian non-institutionalized population at less than 10%. This is likely due to these regions having large Metro areas, where rates of disability are lower. In addition, Region 6 has a younger population, which is statistically less likely to have a disability. Only 9.6% of the Metro population has a disability, while 12.1% of the Non-Metro population has a disability.

Figure 3-133 shows prevalence of disability by disability type in Region 6, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. For the region as a whole and in Metro counties there is a lower rate of every type of disability compared to statewide rates.

**Figure 3-133:** **Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 6, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-134 shows the percent of the civilian non-institutionalized population with a disability in Region 6 by gender and age. Lower rates of disability in Region 6 compared to the state and to other regions are reflected in lower rates of disability among men, women, and children.

**Figure 3-134:** **Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 6, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-135 shows the percent of civilian non-institutionalized population with a disability in Region 6 by race and ethnicity. Lower rates of disability in Region 6 compared to the state and to other regions are reflected in lower rates of disability across most races and ethnicities in the Region.

**Figure 3-135:** **Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 6, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 6 has slightly lower rates of poverty than the state. Figure 3-136 shows the prevalence of poverty in Region 6 by poverty level.

**Figure 3-136: Poverty Rates by Poverty Level, Region 6, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-137 shows the percent of individuals below the poverty line (100% poverty) in Region 6 by age, gender, and race and ethnicity.

**Figure 3-137: Poverty Rates by Age, Gender, Race and Ethnicity, Region 6, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-138 and Figure 3-139 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Houston-Pasadena-The Woodlands, TX. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. An equal share of job holders working in the Houston-Pasadena-The Woodlands CBSA drive less than 10 miles and 10 to 24 miles to work, this may be due to the Houston-Pasadena-The Woodlands CBSA having such a large area and the ability to live closer to work due to the lack of zoned residential versus employment areas.

**Figure 3-138: Share of Job Counts by Distance between Work Census Block and Home Census Block, Houston-Pasadena-The Woodlands CBSA, TX, 2021**

**Figure 3-139: Job Counts by Distance between Work Census Block and Home Census Block, Houston-Pasadena-The Woodlands CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-140 shows the employment and living situation for individuals in each county of Region 6. Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it.

**Figure 3-140: Employment and Living Situations, Counties in Region 6, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

There is a high degree of mobility in and out of counties in Region 6. The City of Houston, which extends into Fort Bend, Montgomery, and Harris counties, is the job center of the region. These

three counties alone account for nearly 2.9 million jobs in Region 6, over 85% of the jobs in the entire region. Figure 3-141 shows the mean travel time to work for counties in Region 6.

**Figure 3-141: Mean Travel Time to Work, Counties in Region 6, 2017 to 2021**

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

High mean commute times in Region 6 are likely due to high density in the region along with the centrality of jobs in the Houston area.

## Housing Profile

Figure 3-142 and shows the age of the housing stock in Region 6.

**Figure 3-142: Age of Housing Stock by County, Region 6, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

The area around Houston has experienced explosive growth within Metro counties, though this growth in construction over the last 23 years has not yet reached all of the Non-Metro counties in Region 6.

Figure 3-143 shows households in Region 6 experiencing one or more housing problems. Region 6 has the highest rate of housing problems among LI owner and VLI renter households, the second highest rate of housing problems for ELI renter households behind Region 7, and the third highest rates for VLI and MI owner households.

**Figure 3-143: Percent of Households with One or More Housing Problems, Region 6, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Figure 3-144 shows renter and owner households in Region 6 lacking complete plumbing or kitchen facilities.

**Figure 3-144: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 6, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Region 6 has comparable rates of units lacking plumbing or kitchen facilities compared to the state average. Figure 3-145 shows renter and owner households in Region 6 that are cost burdened.

**Figure 3-145: Percent of Households Experiencing Cost Burden, Region 6, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Region 6 has high rates of cost burden compared to other regions, particularly among owner households. Region 6, like Region 3, has high rates of cost burden for ELI and VLI renter households and all owner households compared to other regions. The majority of ELI and VLI households in Region 6 experience housing cost burden. Figure 3-146 shows renter and owner households in Region 6 that are overcrowded.

**Figure 3-146: Percent of Households Experiencing Overcrowding, Region 6, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Rates of overcrowding in Region 6 are slightly higher than state rates. Within Region 6, households in Metro counties with incomes less than or equal to 100% AMFI experience overcrowding at higher rates than households in Non-Metro counties. Renter households in Non-Metro counties have low rates of overcrowding compared to other regions, particularly ELI households. However, very high rates for ELI and VLI renter households in Metro counties, where the vast majority of Region 6's population lives, give Region 6 an overall high rate for ELI and VLI renter households. Figure 3-147 shows average housing costs in Region 6.

**Figure 3-147: Average Housing Costs, Region 6, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Along with fast growth and a denser population, Region 6 has some of the highest average housing costs in the state. Figure 3-148 shows the number of bedrooms in renter and owner occupied households in Region 6.

**Figure 3-148: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 6, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

The overall tenure and unit size characteristics of Region 6 are relatively close to the characteristics for the state as a whole. Region 6 has the second highest percentage of renter occupied units with 0 or 1 bedrooms, behind Region 7, and the second lowest percentage of renter occupied 3 or more bedroom units, also behind Region 7. Of total occupied units in Region 6, 15.4% are renter occupied and consist of 0 or 1 units, the second highest percentage among all regions. This would suggest it may be more difficult for larger households, such as families, to find rental units.

High rates of overcrowding among renter households aligns with the distribution of unit sizes in Region 6. There are very few owner occupied units with fewer than 3 bedrooms, while rental units are heavily concentrated in zero to two bedroom units. Figure 3-149 maps the active multifamily properties in Region 6 participating in TDHCA programs.

**Figure 3-149:** **Map of Active Multifamily Properties Participating in TDHCA Programs, Region 6, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Unit Count" reflects the total units at the properties in a county (both subsidized and market rate) while the column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Harris County, which contains the majority of the City of Houston, has the largest population in Region 6 and has the greatest number of active multifamily properties participating in TDHCA programs. Houston's boundaries extend into Fort Bend and Montgomery counties, which also have a large number of multifamily properties participating in TDHCA programs. Galveston and Brazoria counties, which also have a large number of properties participating in TDHCA programs, are just south of Houston and capture many of its suburbs and additional large population centers such as Pearland, League City, and Galveston.

# Region 7—"Capital"

**Point of Reference Cities:** Austin, Georgetown, Round Rock, Bastrop, San Marcos

## Geo-Demographic Background

The Capital region is the fastest growing region in the state due to a robust technology industry, state government, and environmental and cultural amenities. The State Capitol, as well as the state's flagship university, The University of Texas, are both located in Austin. The region is home to geographically appealing highland lakes, parks, and the eastern edge of Texas Hill Country. The rapidly growing Hill Country region is becoming a favorite place for retirees, second homes, wine vineyards, outdoor recreation, and tourism.

The recent demand to live in Austin's urban core has caused property values to spike and has created a challenge in affordable housing development. Many neighborhoods in south and east Austin are gentrifying quickly, further exacerbating housing challenges for the historically minority populations living in those areas.

**Figure 3-150: Counties in TDHCA Service, Region 7**

Region 7 has a much lower population of African Americans as compared to the state as a whole. While the Capital region is currently majority White, Non-Hispanic, that is projected to change within the next 20 years, when the area is anticipated to be nearly evenly split between White, Non-Hispanic residents and Hispanic or Latino residents. High population growth rates are predicted to continue and even increase their pace. Figure 3-151 shows population projections for Region 7.

**Figure 3-151: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 7, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-152 shows the R/ECAPs in Region 7.

**Figure 3-152: Map of R/ECAPS, Region 7, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-153 shows the Diversity Index by census tract for Region 7.

**Figure 3-153: Diversity Index, Region 7, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

## Household Characteristics

Figure 3-154 shows the family characteristics of households in Region 7.

**Figure 3-154: Household and Family Characteristics, Region 7, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

Region 7 has the largest average non-family household size, suggesting that non-related persons might be living together in order to bring down high housing costs, an expected housing trend in communities with a high number of university students. In all other categories, Region 7 values are slightly lower than state figures. The average family household size is slightly below the median household size of all regional figures.

## Income

Figure 3-155 displays household income category by race and ethnicity for Region 7. In Region 7, White and Asian households are both overrepresented above the AMFI, with close to 60% of both White and Asian households at or above the AMFI. African American and Hispanic households however are more clustered below the median AMFI, though not quite as concentrated at the very lowest incomes as in other regions.

**Figure 3-155: Household Income Category by Race and Ethnicity, Region 7, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Region 7, along with Regions 3 and 6, has the lowest rates of disability among the civilian non-institutionalized population at less than 10%. This is likely due to these regions having large Metro areas, where rates of disability are lower. Only 9.3% of the Metro population in Region 7 has a disability, while 16.9% of the Non-Metro population has a disability. If services and amenities for persons with disabilities are concentrated in the Metro areas, this could be a burden to those living in the outlying regions.

Figure 3-156 shows prevalence of disability by disability type in Region 7, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and

independent living difficulty. For the region as a whole and in Metro counties there is a lower rate of every type of disability compared to statewide rates.Figure 3-156: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 7, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-157 shows the percent of the civilian non-institutionalized population with a disability in Region 7 by gender and age. Lower rates of disability in Region 7 compared to the state and to other regions are reflected in lower rates of disability among both men and women and among children.

**Figure 3-157: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 7, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-158 shows the percent of civilian non-institutionalized population with a disability in Region 7 by race and ethnicity. Lower rates of disability in Region 7 compared to the state and to other regions are reflected in lower rates of disability across most races and ethnicities in the Region.

**Figure 3-158: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 7, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 7 has lower rates of poverty than the state. After Region 12, Region 7 has the lowest overall poverty rate. Figure 3-159 shows the prevalence of poverty in Region 7 by poverty level.

**Figure 3-159: Poverty Rates by Poverty Level, Region 7, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-160 shows the percent of individuals below the poverty line (100% poverty) in Region 7 by age, gender, and race and ethnicity. With the exception of Hawaiian and Other Pacific Islanders, Region 7 is slightly lower than statewide rates of poverty across age, gender, and race and ethnicity. Region 7 has the lowest rate of poverty among persons who identify as two or more races as well as among American Indians and Alaskan Natives.

**Figure 3-160: Poverty Rates by Age, Gender, Race and Ethnicity, Region 7, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-161 and Figure 3-162 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Austin-Round Rock-San Marcos, TX. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. The Austin-Round Rock-San Marcos CBSA has a greater percentage of job holders commuting less than 10 miles to work than other large CBSAs like Houston-Pasadena-The Woodlands and Dallas-Fort Worth-Arlington, but still has nearly one in four job holders commuting more than 50 miles to work.

**Figure 3-161: Share of Job Counts by Distance between Work Census Block and Home Census Block, Austin-Round Rock-San Marcos CBSA, Region 7, 2021**

**Figure 3-162: Job Counts by Distance between Work Census Block and Home Census Block, Austin-Round Rock-San Marcos CBSA, Region 7, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-163 shows the employment and living situation for individuals in each county of Region 7. Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it. There is a high degree of mobility in and out of counties in Region 7.

**Figure 3-163: Employment and Living Situations, Counties in Region 7, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

Figure 3-164 shows the mean travel time to work for counties in Region 7. Average commute times do not vary widely across counties within the region. Most individuals have commutes that are less than 30 minutes. Somewhat higher mean commute times for counties surrounding Travis County (Austin, TX) in Region 7 is likely due to the centrality of job locations in the Austin area and is likely due to job holders commuting into the Austin area for work.

**Figure 3-164: Mean Travel Time to Work, Counties in Region 7, 2017 to 2021**

Source: Commuting to work data from ACS, 2017-2021 5YR estimates, Table S0801.

## Housing Profile

Figure 3-165 shows the age of the housing stock in Region 7.

**Figure 3-165:** <span style="color:#C0392B">**Age of Housing Stock by County, Region 7, 2017 to 2021**</span>

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Population growth in Region 7 has largely been in Austin and the surrounding area. In Williamson and Hays counties, the counties neighboring Travis County (Austin, TX), more than half of the housing stock is less than 23 years old and less than 10% is older than 54 years, which suggests a rapidly growing suburban area.

Figure 3-166 shows households in Region 7 experiencing one or more housing problems.

**Figure 3-166:** <span style="color:#C0392B">**Percent of Households with One or More Housing Problems, Region 7, 2016 to 2020**</span>

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

The Metro counties of Region 7 in particular have very high rates of housing problems for ELI, VLI, LI, and MI owner and ELI and VLI renter households. Rates of housing problems are so high in Metro counties that despite average rates in Non-Metro counties, Region 7 as a whole still has one of the highest percentages of households experiencing housing problems in the previously mentioned income categories among all regions. Figure 3-167 shows renter and owner households in Region 7 lacking complete plumbing or kitchen facilities.

**Figure 3-167:** <span style="color:#C0392B">**Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 7, 2016 to 2020**</span>

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Region 7 has low percentages of units lacking plumbing or kitchen facilities compared to other regions, particularly in Metro counties. Rates are higher in Non-Metro than Metro counties for all households with incomes less than or equal to 50% AMFI. ELI renter households are more likely to lack complete facilities than ELI owner households. Figure 3-168 shows renter and owner households in Region 7 that are cost burdened. Region 7 has by far the highest rates of housing cost burden among all regions. Over 4 out of 5 ELI renter households in Region 7 experience housing cost burden. Both owner and renter households in Metro counties are particularly affected by housing cost burden. Metro counties have higher rates than Non-Metro counties in

general, which would suggest that the Austin-Round Rock MSA has a particularly expensive housing market.

**Figure 3-168:** Percent of Households Experiencing Cost Burden, Region 7, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Figure 3-169 shows renter and owner households in Region 7 that are overcrowded.

**Figure 3-169:** Percent of Households Experiencing Overcrowding, Region 7, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

With the exception of LI Owner households, overcrowding rates are extremely low for owner households in Non-Metro counties of Region 7.

**Figure 3-170:** Average Housing Costs, Region 7, 2021

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2021.

Figure 3-170 shows the average housing costs in Region 7. The average monthly rent for Region 7 is approximately $1,300, nearly twice that of many other regions in Texas, and the highest of all the regions. Additionally, Region 7 has the highest average monthly owner costs of any region. Figure 3-171 shows the number of bedrooms in renter and owner occupied households in Region 7.

**Figure 3-171:** Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 7, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Region 7 has a large proportion of renter occupied units compared to owner occupied units among all regions with one-third of total occupied units being renter occupied. Of total occupied units in Region 7, 16.5% consist of 0 or 1 bedrooms, the highest percentage among all regions. Only 27.2% of renter occupied units consist of 3 or more bedrooms, the lowest among all regions. More than 7 in 10 rental units have only two or fewer bedrooms, which can exacerbate high rents in the area and contribute to the overcrowding that Metro renters experience. Figure 3-172 maps the active multifamily properties in Region 7 participating in TDHCA programs.

**Figure 3-172:** Map of Active Multifamily Properties Participating in TDHCA Programs, Region 7, 2023

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Unit Count" reflects the total units at the properties in a county (both subsidized and market rate) while the column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Active multifamily properties participating in TDHCA programs are concentrated along the Interstate 35 corridor, particularly in Travis and Williamson counties. The City of Austin is primarily in Travis County but extends into Williamson and Hays counties, which also have a notable multifamily property count. Williamson County also contains Georgetown and Round Rock, and Hays County contains San Marcos, all along the Interstate 35 corridor and all with a presence of active multifamily properties participating in TDHCA programs.

# Region 8—"Central Texas"

**Point of Reference Cities:** Waco, College Station, Temple, Killeen

## Geo-Demographic Background

The Central Texas region has long supported cattle ranching and farming. The Brazos River bisects the region and flows directly through Waco, which is the largest city in the region. Cattle drives, railroads, and farming communities along with settlers from Germany, Spain, and Italy made this region a diverse collection of new Texans. Similar to other Texas towns based around agriculture and ranching, religious institutions are centers of the community.

Today agriculture and ranching is still a large part of the economy and the region is supported by two major universities, Baylor University in Waco and Texas A&M University in College Station. Fort Hood Military Base, located in Killeen, is also a significant institution in the region. Lower income and minority households reside mostly within the region's cities.

**Figure 3-173: Counties in TDHCA Service, Region 8**

Region 8 closely reflects the state as a whole. Race and ethnicity population projections show Region 8 slowly becoming majority-minority. Figure 3-174 shows population projections for Region 8.

**Figure 3-174: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 8, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-175 shows the R/ECAPs in Region 8.

**Figure 3-175: Map of R/ECAPS, Region 8, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-176 shows the Diversity Index by census tract for Region 8.

**Figure 3-176: Diversity Index, Region 8, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

R/ECAPs in Region 8 are focused in the urban centers of Waco, Temple, and College Station. Similar to Region 7, based on the R/ECAPs in Waco and Temple and the Diversity Index values of census tracts in the Waco-Temple-Killeen area, much of the minority population in Region 8 resides along the Interstate 35 corridor. While Waco, Temple, and College Station all have census tracts with high Diversity Index values, there are some outlying tracts in the eastern half of Region 8 with equitable distribution of diversity as well.

## Household Characteristics

Figure 3-177 shows the family characteristics of Region 8 households.

**Figure 3-177: Household and Family Characteristics, Region 8, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

## Income

Figure 3-178 displays household income by race and ethnicity for Region 8. Region 8 is very similar to Region 7, with a majority of White and Asian households at or above the AMFI. Like many other regions, more than 35% of Black or African American households are at or below 50% AMFI, however slightly fewer Hispanic households are at that same income category, with approximately 31% of Hispanic households at or below 50% AMFI.

**Figure 3-178: Household Income Category by Race and Ethnicity, Region 8, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 8, 14.2% has a disability, which is slightly higher than state's rate of 11.4%. The disparity between Metro and Non-Metro counties is also present, but less pronounced than in more urbanized regions of the state. The biggest difference in Region 8 is a high rate of ambulatory disabilities, which may be due to a large concentration of military and veteran residents and proximity to the Fort Hood Military Base in Killeen, TX. Figure 3-179 shows prevalence of disability by disability type in Region 8, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 3-179: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 8, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-180 shows the percent of the civilian non-institutionalized population with a disability in Region 8 by gender and age. Unlike much of the rest of the state, Region 8 has higher rates of disability among children in Metro counties than in Non-Metro counties

**Figure 3-180: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 8, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-181 shows the percent of the civilian non-institutionalized population with a disability in Region 8 by Race and Ethnicity. Region 8 rates of disability across races and ethnicity align closely with the state rates.

**Figure 3-181: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 8, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 8 has slightly higher rates of poverty than the state but overall aligns closely with state levels. Figure 3-182 shows the prevalence of poverty in Region 8 by poverty level.

**Figure 3-182: Poverty Rates by Poverty Level, Region 8, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-183 shows the percentage of individuals below the poverty line (100% poverty) in Region 8 by age, gender, and race and ethnicity. In Region 8, nearly one in four Black and African Americans lives below the poverty line. Compared to other regions, Region 8 has the third highest poverty rate among Asians behind Regions 5 and 1, nearly double that of the state.

**Figure 3-183: Poverty Rates by Age, Gender, Race and Ethnicity, Region 8, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-184 and Figure 3-185 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block in the CBSA of College-Station-Bryan, TX. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. Nearly half of job holders in the College Station-Bryan CBSA drive less than 10 miles to work, but over one in three still drive over 50 miles to work, this is likely due to people from surrounding communities commuting into the CBSA for work.

**Figure 3-184: Share of Job Counts by Distance between Work Census Block and Home Census Block, College Station-Bryan CBSA, TX 2021**

**Figure 3-185: Job Counts by Distance between Work Census Block and Home Census Block, College Station-Bryan CBSA, TX 2021**

Source: Job center information, On the Map data tool 2021, Census.gov

Figure 3-186 and Figure 3-187 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Killeen-Temple, TX.

**Figure 3-186: Share of Job Counts by Distance between Work Census Block and Home Census Block, Killeen-Temple CBSA, TX, 2021**

**Figure 3-187: Job Counts by Distance between Work Census Block and Home Census Block, Killeen-Temple CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-188 and Figure 3-189 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block in the CBSA of Waco, TX. Across the three CBSAs nearly half of job holders are traveling fewer than 10 miles between home and work. However, in all three CBSAs, a significant portion travels more than 50 miles for work. This indicates both near and far proximity to jobs within CBSAs.

**Figure 3-188: Share of Job Counts by Distance between Work Census Block and Home Census Block, Waco CBSA, TX, 2021**

**Figure 3-189: Job Counts by Distance between Work Census Block and Home Census Block, Waco CBSA, TX, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-190 shows the employment and living situation for individuals in each county of Region 8.

**Figure 3-190: Employment and Living Situations, Counties in Region 8, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

Employment and living situations include those that are employed in the county but live outside of the county, those who live and work in the county, and those who live in the county but work outside of it. While a majority of job holders are traveling less than 10 miles to work, an abnormally high level of job holders are travelling more than 50 miles to work in Region 8 likely indicating that jobs are not evenly distributed across the region. Some job holders may be travelling to other regions, such as nearby Regions 3 and 7, for jobs.

Figure 3-191 shows the mean travel time to work for counties in Region 8. Mean travel times in Region 8 vary widely from 17.4 minutes to 31.4 minutes. Considering the high number of individuals driving more than 50 miles to work as well as somewhat higher commute times, it can be assumed that many individuals are driving to the job centers in CBSAs for work, indicating job distribution across the region is inconsistent with where individuals are finding housing.

**Figure 3-191: Mean Travel Time to Work, Counties in Region 8, 2017 to 2021**

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 3-192 shows the age of the housing stock in Region 8.

**Figure 3-192: Age of Housing Stock by County, Region 8, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Nestled between the Capital Region and the Metroplex, Region 8 follows a similar pattern to other less urbanized regions, with approximately one in three housing units being 54 years or older. However, unlike Regions 1 and 2, more of the housing stock is newer.

Figure 3-193 shows households in Region 8 experiencing one or more housing problems.

**Figure 3-193: Percent of Households with One or More Housing Problems, Region 8, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

In general, rates of households experiencing one or more housing problems in Region 8 are relatively average, however, LI renter households in Metro counties in particular have higher rates of housing problems compared to other regions. Rates of owner households with incomes above 100% AMFI experiencing one of more housing problems are higher in Non-Metro counties than in Metro counties, which differs from the pattern seen in other regions. Figure 3-194 shows renter and owner households in Region 8 lacking complete plumbing or kitchen facilities.

**Figure 3-194:** **Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 8, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Rates of units lacking complete plumbing or kitchen facilities in Region 8 are similar to statewide rates. Renter households in Non-Metro counties of Region 8 in particular have a higher percentage of units lacking complete plumbing or kitchen facilities than other regions. Figure 3-195 shows renter and owner households in Region 8 that are cost burdened.

**Figure 3-195:** **Percent of Households Experiencing Cost Burden, Region 8, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Region 8 has higher rates of cost burden among renter households with incomes greater than 50% AMFI in Metro counties compared to other regions. Overall, the rates of cost burden in Region 8 are relatively close to statewide figures. Figure 3-196 shows renter and owner households in Region 8 that are overcrowded.

**Figure 3-196:** **Percent of Households Experiencing Overcrowding, Region 8, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Region 8 has relatively low levels of overcrowding for renter households, though generally higher rates in Non-Metro counties than in Metro counties. Compared to other regions and the state as a whole, Region 8 has low levels of overcrowding for both renter and owner households. ELI renter households in Region 8 have the lowest rate of overcrowding among all regions.

**Figure 3-197:** **Average Housing Costs, Region 8, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Figure 3-197 shows the average housing costs in Region 8. Situated along the Interstate 35 corridor between Austin and the Dallas-Fort Worth area, housing costs are lower than in the larger cities but higher than more outlying areas. Figure 3-198 shows the number of bedrooms in renter and owner occupied households in Region 8.

**Figure 3-198: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 8, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Forty percent of Region 8 occupied units are renter occupied, the highest proportion in the state.

Cost burden is the primary housing problem in Region 8, as is the case in the rest of the state. Region 8 has the second lowest percentage of renter occupied units with 0 or 1 bedrooms and the highest percentage of renter occupied units with 3 or more bedrooms among all regions. 31.4% of the occupied units in Region 8 are renter occupied units with 2 or more bedrooms, the highest percentage among all regions. The lack of smaller units available to both renters and owners likely affects the housing cost burden. Figure 3-199 maps the active multifamily properties in Region 8 participating in TDHCA programs.

**Figure 3-199: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 8, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Active multifamily properties participating in TDHCA programs are clustered around larger municipalities and population centers. Bell County contains Temple, McLennan County contains Waco, and Brazos County contains the Bryan-College Station MSA.

# Region 9—"Alamo"

Point of Reference Cities: San Antonio, New Braunfels

## Geo-Demographic Background

Having the largest Spanish mission settlement in Texas, the San Antonio area has deep Texas roots and was the location of many important battles against Mexico for Texas' independence, such as the Battle of the Alamo. The economy is supported by a large concentration of military bases and associated industries, tourism, and corporate headquarters. San Antonio has a proud and unique Texan and Hispanic cultural influence evident in its architecture, food, and cultural events.

The region has experienced strong suburban growth in the affluent suburbs north of San Antonio. The north side of the city and northern suburbs of San Antonio are majority White, while the remainder of the city is majority Hispanic or Latino. Counties surrounding San Antonio are less populated and participate in ranching, farming, and rural activities.

**Figure 3-200: Counties in TDHCA Service Region 9**

Unlike other largely Metro regions, Region 9 is currently a majority Hispanic region. This trend is predicted to continue. By 2050, it is projected that one in four residents will be White, Non-Hispanic, and approximately two in three will be Hispanic or Latino. Figure 3-201 shows population projections for Region 9.

**Figure 3-201: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 9, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-202 shows the R/ECAPs in Region 9.

**Figure 3-202: Map of R/ECAPS, Region 9, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-203 shows the Diversity Index by census tract for Region 9.

**Figure 3-203: Diversity Index, Region 9, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

Many R/ECAPs overlap with census tracts that have a high Diversity Index in the San Antonio area. R/ECAPs are spread throughout central San Antonio with a few northwest and southwest of the core. Region 9 has relatively high Diversity Index values across the region, with a few areas with less diversity in the north and southeast portions of the region and southwest San Antonio.

## Household Characteristics

Figure 3-204 shows the household and family characteristics of Region 9 households. Region 9 has very similar family and household characteristics to the state as a whole, particularly the average non-family household size.

**Figure 3-204: Household and Family Characteristics, Region 9, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

## Income

Figure 3-205 displays the percentage of the regional population by household income category and race and ethnicity for Region 9. For both Hispanic and Black or African American households in Region 9, about 30% of households have incomes at or below 50% AMFI, while less than 20% of White households are at or below the same income category.

**Figure 3-205: Household Income Category by Race and Ethnicity, Region 9, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 9, 14.1% has a disability, which is slightly higher than state's rate of 11.4%. Figure 3-206 shows the prevalence of disability by disability type in Region 9, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 3-206: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 9, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-207 shows the percent of the civilian non-institutionalized population with a disability in Region 9 by gender and age.

**Figure 3-207: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 9, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-208 shows the percent of the civilian non-institutionalized population with a disability in Region 9 by race and ethnicity. With the exception of Hawaiian or Other Pacific Islander individuals, Region 9 rates of disability regardless of race and ethnicity are consistently higher than statewide rates. Disability rates among Hispanic or Latino individuals is higher than the rates among most other regions for the same population.

**Figure 3-208: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 9, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 9 has slightly lower rates of poverty than the state across all poverty levels. Figure 3-209 shows the prevalence of poverty in Region 9 by poverty level.

**Figure 3-209: Poverty Rates by Poverty Level, Region 9, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-210 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 9 by age, gender, and race and ethnicity. Across age, gender, and race and ethnicity, the poverty rate in Region 9 is generally lower than statewide rates. Compared to other regions, Region 9 has one of the higher rates of poverty among American Indian and Alaskan Native individuals at 17.9% and Native Hawaiian and Other Pacific Islander individuals at 22.8%. Hispanic or Latino individuals make up over half of the population in Region 9, which has the fourth lowest poverty rate among Hispanic or Latino individuals in the state at 17.1%.

**Figure 3-210: Poverty Rates by Age, Gender, Race and Ethnicity, Region 9, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-211 and Figure 3-212 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the San Antonio-New Braunfels, TX CBSA. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA. The majority of people in the San Antonio-New Braunfels CBSA tend to live within 25 miles of their job, with only one in five travelling 25 miles or further, one of the lowest rates in the state. This tends to indicate that a majority of people live and work in the area, which is supported by the 620,000 individuals reflected in Figure 3-213 who live and work in Bexar County alone, which accounts for around half of all jobs in the Region.

**Figure 3-211: Share of Job Counts by Distance between Work Census Block and Home Census Block, San Antonio-New Braunfels CBSA, TX, Region 9, 2021**

**Figure 3-212: Job Counts by Distance between Work Census Block and Home Census Block, San Antonio-New Braunfels CBSA, TX, Region 9, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-213 shows the employment and living situation of individuals in each county of Region 9. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. Compared to other regions, there is a low degree of mobility in and out of counties in Region 9, where more than five times as many people live and work in the same county than commute to another county for work. Jobs are primarily located in the San Antonio area; Bexar County (San Antonio, TX) alone accounts for approximately 85% of the jobs in the entire region.

**Figure 3-213: Employment and Living Situations, Counties in Region 9, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

Figure 3-214 shows the mean travel time to work for counties in Region 9, which vary greatly from 19.6 minutes to 36.6 minutes.

**Figure 3-214: Mean Travel Time to Work, Counties in Region 9, 2017 to 2021**

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

Somewhat higher mean commute times for counties surrounding Bexar County are likely due to the centrality of job locations in the San Antonio area, and is likely due to job holders commuting into the San Antonio area for work.

## Housing Profile

Figure 3-215 shows the average age of housing stock by county in Region 9 as a percentage of the total housing stock.

**Figure 3-215: Age of Housing Stock by County, Region 9, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Like other regions with large populations in Metro counties, Region 9 has a younger housing stock than primarily Non-Metro regions, and has a high percentage of units that are newer than 19 years old.

Figure 3-216 shows households in Region 9 experiencing one or more housing problems. ELI renter households in Region 9 have higher rates of housing problems in Non-Metro as opposed to Metro counties. Non-Metro households in Region 9 have high rates of experiencing at least one housing problem compared to other regions except for in the MI category. Figure 3-217 shows renter and owner households in Region 9 that lack complete plumbing or kitchen facilities.

**Figure 3-216: Percent of Households with One or More Housing Problems, Region 9, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

**Figure 3-217: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 9, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

The percentages of units lacking complete plumbing or kitchen facilities in Region 9 are relatively close to state figures.

**Figure 3-218: Percent of Households Experiencing Cost Burden, Region 9, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Figure 3-218 shows renter and owner households in Region 9 that are cost burdened. Compared to other regions, Region 9 has higher than average rates of cost burden in Non-Metro counties and average rates of cost burden in Metro counties. Region 9's rates of housing cost burden are

relatively close to statewide figures. Figure 3-219 shows renter and owner households in Region 9 that are overcrowded.

**Figure 3-219: Percent of Households Experiencing Overcrowding, Region 9, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Region 9 has average to somewhat high rates of overcrowding when compared to other regions. Renter households in Non-Metro counties with incomes less than or equal to 80% AMFI have particularly high rates of overcrowding in Region 9. Figure 3-220 shows the average housing costs in Region 9

**Figure 3-220: Average Housing Costs, Region 9, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, October 2024.

Region 9 contains the state's second most populous city (San Antonio), but housing costs in Region 9 are lower than those in regions containing other large Texas cities such as Region 3, Region 6, and Region 7. Figure 3-221 shows the number of bedrooms in renter and owner occupied housing units in Region 9.

**Figure 3-221: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 9, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Region 9, out of all the state regions, most closely matches the state tenure and unit size profile. Unit sizes are well distributed among renter occupied units in Region 9, and more evenly spread than in any other region. Affordability and overcrowding are the key drivers of housing problems in the region. This is less of a problem for owner households, who have access to many larger units with 3 or more bedrooms. Renters in Non-Metro counties may have a hard time finding large enough units without experiencing housing cost burden. Figure 3-222 maps the active multifamily properties in Region 9 participating in TDHCA programs.

**Figure 3-222: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 9, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Bexar County, which contains San Antonio, dominates the region in terms of population, jobs, and active multifamily properties participating in TDHCA programs. Active properties exist in each of the counties in the region.

# Region 10—"Coastal Bend"

**Point of Reference Cities:** Corpus Christi, Victoria, Kingsville

## Geo-Demographic Background

The Coastal Bend was the first area settled by Europeans in Texas when the French established a colony near Matagorda Bay, which prompted the Spanish to also attempt to colonize the region followed by German and Polish settlers. Culturally, the area today is mainly a mix of White and Hispanic or Latino residents and is thought to be the birthplace and epicenter of Mexico-American Tejano music.

Economic activities include ranching, farming, and fishing along the coast. Recently, oil and gas development and exploration is supporting economic growth in the region. There are still historic and large private ranches in the region, most notably the King Ranch. Additionally, tourist destinations include Corpus Christi for its beaches, the Padre Island National Seashore, the Texas State Aquarium, and a naval aviation museum housed on the WII aircraft carrier, USS Lexington.

The region has a high percentage of persons identifying as Hispanic or Latino contributing to a very diverse demographic. Low income families are often clustered in areas within the major cities.

**Figure 3-223: Counties in TDHCA Service, Region 10**

Region 10 is currently majority Hispanic. Population projections indicate that this trend is expected to continue. Region 10 is projected to have the third largest percentage of the population identifying as Hispanic by 2050, behind Region 11 and Region 13. Figure 3-224 shows population projections for Region 10.

**Figure 3-224: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 10, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-225 shows the R/ECAPs in Region 10.

**Figure 3-225: Map of R/ECAPS, Region 10, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-226 shows the Diversity Index by census tract for Region 10.

**Figure 3-226: Diversity Index, Region 10, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

Overall, Region 10 is fairly diverse, particularly in the northern half of the region. Exceptions seem to be some of the coastal areas and some of the far north and south portions of the region.

## Household Characteristics

Figure 3-227 shows the household and family characteristics of Region 10 households.

**Figure 3-227: Household and Family Characteristics, Region 10, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

Region 10 is similar to the state as a whole based on family and household characteristics. The average household size, average family household size, and percent of households with a minor in Region 10 are the median values for all regions. Average household and family household sizes are slightly larger than statewide figures while the percent of households with a minor is slightly smaller than statewide figures.

## Income

Figure 3-228 displays the percentage of the regional population by household income, and race and ethnicity for Region 10. Compared to other regions, Hispanic households are not nearly as clustered in the ELI and VLI categories. More than one in four Black or African American households are in the ELI category. A majority of households who do not identify as Hispanic or Latino or Black or African American have incomes greater than 100% AMFI.

**Figure 3-228: Household Income Category by Race and Ethnicity, Region 10, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 10, 14.7% has a disability, higher than state's rate of 11.4%. There is very little difference between Metro and Non-Metro counties.

Figure 3-229 shows prevalence of disability by disability type in Region 10, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and

independent living difficulty. Region 10 has a higher rate of ambulatory disabilities than much of the state.

**Figure 3-229: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 10, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-230 shows the percent of the civilian non-institutionalized population with a disability in Region 10 by gender and age. Higher rates of disability amongst children, males, and females compared to statewide figures is consistent with the higher overall rate of disability in Region 10. Children in the Non-Metro counties of Region 10 experience higher rates of disability than children in the Metro counties of the region.

**Figure 3-230: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 10, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-231 shows the percent of the civilian non-institutionalized population with a disability in Region 10 by race and ethnicity. Higher rates of disability among almost all races and ethnicities is consistent with the higher overall rate of disability in Region 10 compared to the state and other regions. Region 10 has the second highest rate of American Indian and Native Alaskan individuals with a disability among all regions; nearly one in four American Indian and Native Alaskan individuals in Metro counties have a disability. Region 10 also has the second highest rate of Hawaiian and Other Pacific Islander individuals with disability at 31.7% and the highest rate among individuals identifying as Other Race at 16.4% and Hispanic individuals at 13.6%.

**Figure 3-231: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 10, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 10 has slightly higher rates of poverty than the state does, but overall rates in Region 10 align closely with state levels. Figure 3-232 shows the prevalence of poverty in Region 10 by poverty level.

**Figure 3-232: Poverty Rates by Poverty Level, Region 10, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-233 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 10 by age, gender, and race and ethnicity. Across age and gender, Region 10 has slightly higher poverty rates than the state. Across race and ethnicity, with the exception of Hawaiian and Other Pacific Islander, and persons identifying as Some Other Race, Region 10 has slightly higher poverty rates compared to the state.

**Figure 3-233: Poverty Rates by Age, Gender, Race and Ethnicity, Region 10, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-234 and Figure 3-235 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Corpus Christi, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 3-234: Share of Job Counts by Distance between Work Census Block and Home Census Block, Corpus Christi CBSA, TX, Region 10, 2021**

**Figure 3-235: Job Counts by Distance between Work Census Block and Home Census Block, Corpus Christi CBSA, TX, Region 10, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-236 and Figure 3-237 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Victoria, TX CBSA. Despite a relatively sparse population, job holders in both the Corpus Christi CBSA and Victoria CBSA primarily live within 10 miles of where they work. A similar percent of individuals drive more than 50 miles to work in the Victoria CBSA, but overall that number is much smaller than in the Corpus Christi CBSA, which contains the majority of jobs in the Region.

**Figure 3-236: Share of Job Counts by Distance between Work Census Block and Home Census Block, Victoria CBSA, TX, Region 10, 2021**

**Figure 3-237: Job Counts by Distance between Work Census Block and Home Census Block, Victoria CBSA, TX, Region 10, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-238 shows the employment and living situation of individuals in each county of Region 10.

**Figure 3-238:** **Employment and Living Situations, Counties in Region 10, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. There is a high degree of mobility in and out of counties in Region 10. Nueces County (where Corpus Christi is located) has a majority of the jobs in the Region. Figure 3-239 shows the mean travel time to work for counties in Region 10. Despite the relatively sparse population, a large number of individuals tend to live and work in the same county, with just a few exceptions. This is reflected in the relatively low mean travel times; a majority of travel times are under 25 minutes.

**Figure 3-239:** **Mean Travel Time to Work, Counties in Region 10, 2017 to 2021**

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 3-240 shows the age of housing stock by county in Region 10 as a percentage of the total housing stock.

**Figure 3-240:** **Age of Housing Stock by County, Region 10, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Region 10 has relatively old housing stock. Even the Metro counties of Region 10 have a high percentage of older housing stock. Figure 3-241 shows households in Region 10 experiencing one or more housing problems.

**Figure 3-241:** **Percent of Households with One or More Housing Problems, Region 10, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Region 10 has particularly high rates of MI renter households experiencing one or more housing problems compared to other regions. Figure 3-242 shows renter and owner households in Region 10 that lack complete plumbing or kitchen facilities.

**Figure 3-242: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 10, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Households with incomes greater than 30% AMFI are more likely to lack complete plumbing or kitchen facilities in Non-Metro counties than households in the same income category in Metro counties in Region 10, with the reverse being true for ELI households.

**Figure 3-243: Percent of Households Experiencing Cost Burden, Region 10, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Rates for households lacking facilities are average to slightly high for Region 10 households compared to other regions and state figures. Figure 3-243 shows renter and owner households in Region 10 that are cost burdened. Region 10 has relatively low rates of cost burden compared to other regions. Region 10 ELI owner households in particular have lower rates of cost burden than in other regions. Households in Metro counties have a higher rate of cost burden than households in Non-Metro counties. Figure 3-244 shows renter and owner households in Region 10 that are overcrowded.

**Figure 3-244: Percent of Households Experiencing Overcrowding, Region 10, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Overall, Region 10 has average rates of overcrowding compared to other regions. With a few exceptions, overcrowding in Region 10 is worse for renter households in Non-Metro counties. VLI, LI, and MI renter households in Non-Metro counties in particular have high rates of overcrowding compared to other household types. Region 10 has the third worst rate of overcrowding among LI renter households at 9.7%, behind Regions 11 and 13. Figure 3-245 shows the average housing costs in Region 10.

**Figure 3-245: Average Housing Costs, Region 10, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Consistent with other less populated regions, housing costs in Region 10 are fairly low. Figure 3-246 shows the number of bedrooms in renter and owner occupied housing units in Region 10.

**Figure 3-246:** **Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 10, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Region 10 has the second lowest percentage of 3 or more bedroom units regardless of tenure, at 63.9%, behind Region 7 at 62.9%. Of total occupied units in Region 10, 51.5% are owner occupied units with 3 or more bedrooms, the second lowest percentage among all regions, behind Region 8 at 50.3%. This might suggest larger households having a more difficult time finding appropriately sized housing, which could encourage overcrowding. Figure 3-247 maps the active multifamily properties in Region 10 participating in TDHCA programs.

**Figure 3-247:** **Map of Active Multifamily Properties Participating in TDHCA Programs, Region 10, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Active multifamily properties participating in TDHCA programs are concentrated in and around Nueces County, which contains the majority of Corpus Christi. Most counties within the region have at least one active multifamily property.

# Region 11—"South Texas Border"

**Point of Reference Cities:** Del Rio, Laredo, Harlingen, Brownsville, McAllen, South Padre Island

## Geo-Demographic Background

This region encompasses the southern border between Texas and Mexico, and the population is majority Hispanic or Latino. The region's economy is based on trade and business operations between the two countries, tourism, manufacturing, natural gas, oil, food processing, and other agribusinesses. The City of Brownsville in Cameron County also serves as a major gateway to and from Mexico for tourists and shoppers. One of only three federally recognized tribes that reside in Texas, the Kickapoo tribe, resides in Maverick County in Eagle Pass.

Outside of population centers are communities of Mexican-American and immigrant families called "colonias." These small communities often operate outside of municipal control, and may lack one or more of running water, sewer, paved roads or city services.

**Figure 3-248: Counties in TDHCA Service, Region 11**

The Texas Demographic Center projects high population growth rates in Region 11. The region is currently majority Hispanic and this trend is projected to continue. Region 11 is projected to have the largest proportion of residents identifying as Hispanic or Latino and the smallest proportion of residents identifying as Black or African American and White by 2050.

Figure 3-249 shows population projections for Region 11.

**Figure 3-249: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 11, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-250 shows the R/ECAPs in Region 11.

**Figure 3-250: Map of R/ECAPS, Region 11, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-251 shows the Diversity Index by census tract for Region 11.

**Figure 3-251: Diversity Index, Region 11, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

Region 11 is ethnically concentrated, as previously described. The region also experiences high rates of poverty, twice the state rate, which means large portions of the region are considered to be R/ECAPs. R/ECAPs are primarily located outside of city centers, with many R/ECAPs clustered around Laredo, the McAllen-Edinburg-Mission MSA and the Brownsville-Harlingen MSA.

## Household Characteristics

Figure 3-252 shows the household and family characteristics of Region 11 households.

**Figure 3-252: Household and Family Characteristics, Region 11, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

Region 11 differs the most from the State of Texas when it comes to household and family characteristics. Region 11 has the largest average family household size among all regions, but the second smallest average non-family household size behind Region 12. Region 11 also has the largest percentages of households with a minor among all regions.

## Income

Figure 3-253 displays household income by race and ethnicity for Region 11. Compared to the other regions, Region 11 has the lowest overall percent of households with incomes greater than 100% AMFI, less than 40% of all households in the region. Region 11 has a poverty rate nearly twice that of the state rate, and is approaching 27% of the population in poverty. Region 11 has the highest percent of Hispanic households in the ELI category, and is the only region with more than 20% of Hispanic households with incomes less than or equal to 30% AMFI. At the same time, Region 11 has the second highest percent of Black or African American households with incomes greater than 100% AMFI at 45.7%. Region 11 has the lowest rate of Black or African American households in the ELI category, at 9.2%.

**Figure 3-253: Household Income Category by Race and Ethnicity, Region 11, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 11, 13.0% has a disability, which is slightly higher than state's rate of 11.4%.

Figure 3-254 shows prevalence of disability by disability type in Region 11, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty

**Figure 3-254:** Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 11, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-255 shows the percent of the civilian non-institutionalized population with a disability in Region 11 by gender and age. Higher rates of disability amongst children, males, and females compared to the state is consistent with the higher overall rate of disability in Region 11.

**Figure 3-255:** Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 11, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-256 shows the percent of the civilian non-institutionalized population with a disability in Region 11 by race and ethnicity. Higher rates of disability in Region 11 across almost all races and ethnicities is consistent with the higher overall rate of disability in Region 11 compared to the state and other regions. Region 11 has the fourth highest rate of disability among Hispanic or Latino individuals at 12.4% overall.

**Figure 3-256:** Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 11, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

The poverty rate in Region 11 is almost double that of the state as a whole, and is the highest of all the regions. Region 13, the other region primarily along the Texas-Mexico border, has the second highest rate of poverty at 19.4%. Figure 3-257 shows the prevalence of poverty in Region 11 by poverty level.

**Figure 3-257: Poverty Rates by Poverty Level, Region 11, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-258 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 11 by age, gender, and race and ethnicity. Across demographic groups, with the exception of Hawaiian and Other Pacific Islanders, poverty in Region 11 is significantly higher than each group's statewide average, in many cases doubling the rate. Almost 37% of all children under 18 are in poverty, and less than half of the Region is above 200% of the poverty level. Compared to other regions, Region 11 has the highest poverty rate among children, males, females, White individuals, Hispanic or Latino individuals, and persons who identify as Two or More Races or Some Other Race. More than 1 in 4 Hispanic or Latino individuals live below the poverty line.

**Figure 3-258: Poverty Rates by Age, Gender, Race and Ethnicity, Region 11, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-259 and Figure 3-260 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Brownsville-Harlingen, TX CBSA. Work Census Blocks are all located within the listed CBSA but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 3-259: Share of Job Counts by Distance between Work Census Block and Home Census Block, Brownsville-Harlingen CBSA, TX, Region 11, 2021**

**Figure 3-260: Job Counts by Distance between Work Census Block and Home Census Block, Brownsville-Harlingen CBSA, TX, Region 11, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-261 and Figure 3-262 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Laredo, TX CBSA.

**Figure 3-261:** [Share of Job Counts by Distance between Work Census Block and Home Census Block, Laredo CBSA, TX, Region 11, 2021](#)

**Figure 3-262:** [Job Counts by Distance between Work Census Block and Home Census Block, Laredo CBSA, TX, Region 11, 2021](#)

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-263 and Figure 3-264 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the McAllen-Edinburg-Mission, TX CBSA. Region 11 has relatively high percentages of job holders living within 10 miles of their jobs, which indicates that people live closer to their jobs and may indicate that jobs are well dispersed across the region. Over half of the jobs located in Region 11 CBSAs are located in the McAllen-Edinburg-Mission CBSA.

**Figure 3-263:** [Share of Job Counts by Distance between Work Census Block and Home Census Block, McAllen-Edinburg-Mission CBSA, TX, Region 11, 2021](#)

**Figure 3-264:** [Job Counts by Distance between Work Census Block and Home Census Block, McAllen-Edinburg-Mission CBSA, TX, Region 11, 2021](#)

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-265 shows the employment and living situation of individuals in each county of Region 11. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. In Region 11, people tend to live where they work, with large percentages of the population within CBSAs living within 10 miles of their job. A majority of the jobs in the Region are in Hidalgo County (McAllen, Edinburg and Mission, TX), followed by Cameron County (Brownsville and Harlingen, TX) and Webb County (Laredo, TX) respectively.

**Figure 3-265:** [Employment and Living Situations, Counties in Region 11, 2021](#)

Source: On the Map data, 2021, with out of state employment data excluded.

Figure 3-266 shows the mean travel time to work for counties in Region 11.

**Figure 3-266:** [Mean Travel Time to Work, Counties in Region 11, 2017 to 2021](#)

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

Mean travel times vary greatly from 7.1 minutes to 26.7 minutes, with most around 20 minutes. The range of commute times might be accounted for by individuals commuting to the job centers in Region 11 CBSAs.

## Housing Profile

Figure 3-267 shows the age of housing stock by county in Region 11 as a percentage of the total housing stock.

**Figure 3-267: Age of Housing Stock by County, Region 11, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Figure 3-268 shows households in Region 11 experiencing one or more housing problems.

**Figure 3-268: Percent of Households with One or More Housing Problems, Region 11, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Looking at all income categories and household types, Region 11 has the highest rates of households experiencing at least one housing problem among all regions. Region 11 has particularly high rates of higher income households experiencing housing problems in both Metro and Non-Metro counties compared to the rest of the state. Of owner households with incomes greater than 100% AMFI, 11% have at least one housing problem, which is the highest rate among all regions for that household type. Figure 3-269 shows renter and owner households in Region 11 that lack complete plumbing or kitchen facilities.

**Figure 3-269: Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 11, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Region 11 has one of the highest rates of housing lacking complete plumbing or kitchen facilities in the state. Rates are particularly high for lower income and owner households. ELI owner households in Region 11 are more likely to lack complete facilities than ELI renter households. Region 11 is home to the majority of Texas' "colonias," which Texas Government Code 2306.581 defines as:

*"(1) "Colonia" means a geographic area that is located in a county some part of which is within 150 miles of the international border of this state, that consists of 11 or more dwellings that are located in close proximity to each other in an area that may be described as a community or neighborhood, and that:*

*(A) has a majority population composed of individuals and families of low income and very low income, based on the federal Office of Management and Budget poverty index, and meets the qualifications of an economically distressed area under Section 17.921, Water Code; or*

*(B) has the physical and economic characteristics of a colonia, as determined by the department."*

Figure 3-270 shows renter and owner households in Region 11 that are cost burdened. Region 11 has relatively low cost burden compared to other regions in individual income categories, but the percentages of total owner and renter households experiencing cost burden are above the state average. Around two in three ELI renter households in Region 11 are cost burdened, which is low compared to other regions, but nearly 43% total renters are cost burdened, which is high compared to other regions. This is likely due to the fact that more households in Region 11 are in the ELI income category, and that category has the highest rates of cost burden. Having more households in the ELI category, which are more likely to experience cost burden, raises the overall percentage of households experiencing cost burden.

**Figure 3-270: Percent of Households Experiencing Cost Burden, Region 11, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Figure 3-271 shows renter and owner households in Region 11 that are overcrowded.

**Figure 3-271: Percent of Households Experiencing Overcrowding, Region 11, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Region 11 has the highest rates of overcrowding in the State of Texas. Rates of overcrowding in Region 11 are so significant that they skew the overcrowding rates for the state as a whole, putting only a couple of regions above the statewide figures. For all household income groupings, households in Region 11 Metro counties experience overcrowding at a greater rate than those in Non-Metro counties. Rates are particularly high for renter households in Metro counties, where approximately one in six ELI and VLI renter households experience overcrowding, about twice the rate for other regions. The rate of LI and MI renter households in Metro counties experiencing

overcrowding are similarly greater than twice the state rate. Region 11 has the highest rate of overcrowding for renter households at 15.9%, followed by Region 13 with 8.6%, and the highest rate of overcrowding for owner households at 9.0%, followed by Region 13 with 4.0%. Figure 3-272 shows the average housing costs in Region 11.

**Figure 3-272: Average Housing Costs, Region 11, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Average housing costs in Region 11 are consistent with regions with larger Non-Metro populations as opposed to those with a large Metro populations. Figure 3-273 shows the number of bedrooms in renter and owner occupied housing units in Region 11.

**Figure 3-273: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 11, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Region 11's tenure and unit size profile differs considerably from that of the state as a whole. Region 11 has the highest percentage of owner occupied units with 0 or 1 units, but the third lowest percentage of renter occupied units with 0 or 1 bedrooms. Just 9.5% of total Region 11 occupied units consist of renter occupied units with 0 or 1 bedrooms.

Overcrowding and housing cost burden are major housing problems in Region 11. Despite the large family size in the region, there is not a high supply of units with three or more bedrooms, especially for renters. Anecdotal evidence given by advocates and housing providers from the Brownsville area indicates that there is a large unmet need of units with more than four bedrooms. Lack of large units means overcrowding rates that are higher than anywhere else in the state. Figure 3-274 maps the active multifamily properties in Region 11 participating in TDHCA programs.

**Figure 3-274: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 11, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Active multifamily properties participating in TDHCA programs are located across the region with a concentration in the two southernmost counties in the state, Cameron and Hidalgo counties. These counties are home to the Brownsville-Harlingen MSA and McAllen-Edinburg-Mission MSA respectively.

# Region 12—"West Texas"

**Point of Reference Cities**: Midland, Odessa, San Angelo

## Geo-Demographic Background

An influx of Europeans first settled in Midland along the railroad because it was the midpoint between Fort Worth to the east and El Paso to the west. It became an important center for cattle and cotton trade. In the early 20th century, oil was discovered in the Permian Basin. The petroleum industry is still the dominant industry in West Texas. Low income minority populations appear clustered in neighborhoods within the urban centers of Midland, Odessa, and San Angelo.

**Figure 3-275: Counties in TDHCA Service, Region 12**

Region 12 is a sparsely populated area of the state and the second least populous region behind Region 2. It is currently fairly evenly split between White and Hispanic individuals, however, like most of the state, the region is projected to see an increase in the percentage of the Hispanic population versus the White population over the next 30 years. Figure 3-276 shows population projections for Region 12.

**Figure 3-276: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 12, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-277 shows the R/ECAPs in Region 12.

**Figure 3-277: Map of R/ECAPS, Region 12, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-278 shows the Diversity Index by census tract for Region 12.

**Figure 3-278: Diversity Index, Region 12, 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

The highest diversity in the Region appears in Terrell County, the southernmost county on the US-Mexico border. There is only one R/ECAP in Region 12. This is likely due to the area being rich in oil, which creates job opportunities and lowers poverty rates.

## Household Characteristics

Figure 3-279 shows the household and family characteristics of Region 12 households.

Out of all the regions, Region 12 most closely resembles state figures for household and family characteristics.

**Figure 3-279: Household and Family Characteristics, Region 12, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

## Income

Figure 3-280 displays the percentage of the regional population by household income category and race and ethnicity for Region 12. Of all of the regions, Region 12 has the second lowest rate of Hispanic households that are ELI, at 15.4%, and the highest rate of Hispanic households with incomes greater than 100% AMFI, at 40.1%. Despite only 35.3% of Black or African American households having incomes greater than 100% AMFI, data indicates that Region 12 has greater income equality across races and ethnicities than other regions.

**Figure 3-280: Household Income Category by Race and Ethnicity, Region 12, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Region 12 has one of the lower rates of disability among civilian non-institutionalized population in the state. Though the Non-Metro population is relatively small, Region 12 has the second lowest rate of disability among the Non-Metro population at 13.2%, after Region 6 at 12.1%. Figure 3-281 shows prevalence of disability by disability type in Region 12, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

**Figure 3-281: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 12, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-282 shows the percent of the civilian non-institutionalized population with a disability in Region 12 by gender and age. Region 12 has a disability rate across gender and age categories that closely aligns with state levels.

**Figure 3-282: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 12, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-283 shows the percent of the civilian non-institutionalized population with a disability in Region 12 by race and ethnicity. With the exception of Asian individuals, Region 12 has a disability rate across race and ethnicity categories that closely aligns with state levels.

**Figure 3-283: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 12, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

Region 12 has lower rates of poverty than the state as a whole and is lower than most regions. Figure 3-284 shows the prevalence of poverty in Region 12 by poverty level.

**Figure 3-284: Poverty Rates by Poverty Level, Region 12, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-285 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 12 by age, gender, and race and ethnicity. Across most demographic groups, poverty in Region 12 is lower than each group's statewide average. Region 12 has the lowest regional poverty levels among Asians and American Indian and Alaskan Native populations.

**Figure 3-285: Poverty Rates by Age, Gender, Race and Ethnicity, Region 12, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-286 and Figure 3-287 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Midland, TX CBSA. Work

Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 3-286:** Share of Job Counts by Distance between Work Census Block and Home Census Block, Midland CBSA, TX, Region 12, 2021

**Figure 3-287:** Job Counts by Distance between Work Census Block and Home Census Block, Midland CBSA, TX, Region 12, 2021

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-288 and Figure 3-289 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the Odessa, TX CBSA.

**Figure 3-288:** Share of Job Counts by Distance between Work Census Block and Home Census Block, Odessa CBSA, TX, Region 12, 2021

**Figure 3-289:** Job Counts by Distance between Work Census Block and Home Census Block, Odessa CBSA, TX, Region 12, 2021

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-290 and Figure 3-291 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the San Angelo, TX CBSA. Region 12 has one of the higher percentages of job holders living within 10 miles of their jobs, with over 50% of job holders in all three CBSAs living within 10 miles of work. This indicates that people live closer to their jobs and might indicate that jobs are well dispersed across the region. Despite having a majority of job holders living within 10 miles of where they work, over a quarter of job holders in the three CBSAs drive more than 50 miles to work at a job in one of the CBSAs, which may be due to movement between the CBSAs.

**Figure 3-290:** Share of Job Counts by Distance between Work Census Block and Home Census Block, San Angelo CBSA, TX, Region 12, 2021

**Figure 3-291:** Job Counts by Distance between Work Census Block and Home Census Block, San Angelo CBSA, TX, Region 12, 2021

Source: Job center information, On the Map data tool 2021, Census.gov.

Figure 3-292 shows the employment and living situation of individuals in each county of Region 12. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. In

Ector County (Odessa, TX), Midland County (Midland, TX), and Tom Green County (San Angelo, TX), there is an influx of individuals coming in for work from outside of the county.

**Figure 3-292: Employment and Living Situations, Counties in Region 12, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.
* Data unavailable for Loving County due privacy and anonymity concerns brought about by the county's small population.

Figure 3-293 shows the mean travel time to work for counties in Region 12. Many of the counties in Region 12 have mean commute times of less than 20 minutes, meaning that for many counties in the region, people live relatively close to where they work. The counties with average commute times over 25 minutes are all counties with small populations, and a majority of people living in those respective counties travel outside of the county for work.

**Figure 3-293: Mean Travel Time to Work, Counties in Region 12, 2017 to 2021**

Source: Commuting to work data from ACS, 2012-16 5YR estimates, Table S0801.

## Housing Profile

Figure 3-294 shows the age of housing stock by county in Region 12 as a percentage of the total housing stock.

**Figure 3-294: Age of Housing Stock by County, Region 12, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

Figure 3-295 shows households in Region 12 experiencing one or more housing problems.

**Figure 3-295: Percent of Households with One or More Housing Problems, Region 12, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Looking at all income categories and household types, Region 12 has one of the lowest rates of households experiencing at least one housing problem among all regions. Figure 3-296 shows renter and owner households in Region 12 that lack complete plumbing or kitchen facilities.

**Figure 3-296:** Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 12, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Renter households with incomes greater than 100% AMFI in Metro counties have somewhat high rates of experiencing housing problems, but rates of housing problems for all other household types are low compared to other regions.

Region 12 has a relatively high rate of housing units that lack plumbing or kitchen facilities compared to other regions. Rates are particularly high compared to other regions for VLI renter households and MI owner households. ELI owner households in Region 12 are more likely to lack complete facilities than ELI renter households. Figure 3-297 shows renter and owner households in Region 12 that are cost burdened.

**Figure 3-297:** Percent of Households Experiencing Cost Burden, Region 12, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Region 12 has relatively low rates of cost burden compared to other regions, particularly for owner households with incomes greater than 50% AMFI. Region 12 also has one of the lowest overall rates of cost burden for renter and owner households compared to other regions. With the exception of ELI owner households, households in Metro counties experience cost burden at a greater rate than those in Non-Metro counties. Figure 3-298 shows renter and owner households in Region 12 that are overcrowded.

**Figure 3-298:** Percent of Households Experiencing Overcrowding, Region 12, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

There is some overcrowding in Region 12, but less than occurs in many other regions. There is a slight spike in MI renter households experiencing overcrowding. Rates of overcrowding for VLI and LI renter and ELI and VLI owner households are low compared to other regions.

**Figure 3-299:** Average Housing Costs, Region 12, 2021

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Despite a low population, Region 12 has slightly higher costs than similarly Non-Metro regions, Region 1 and Region 2. Figure 3-300 shows the number of bedrooms in renter and owner occupied housing units in Region 12.

**Figure 3-300: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 12, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Of occupied units in Region 12, 22.2% are renter occupied units with 2 or more bedrooms, the lowest percentage among all regions. There is a need for smaller units, especially for owners looking for 2 or fewer bedrooms, but renters have some choice across the board. Figure 3-301 maps the active multifamily properties in Region 12 participating in TDHCA programs.

**Figure 3-301: Map of Active Multifamily Properties Participating in TDHCA Programs, Region 12, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

The sparse population of Region 12 means that the area is unlikely to have well distributed units, which is visible in Figure 3-301. The large geography of the area is covered by only 63 properties, with large stretches of land between them, and some small pockets of concentration in Midland and Ector counties, which contain the urban centers of Midland and Odessa, respectively.

# Region 13—"Upper Rio Grande"

**Point of Reference Cities**: El Paso, Alpine, Presidio, Fort Davis

## Geo-Demographic Background

Outside of the City of El Paso, the Upper Rio Grande region is a sparsely populated and rugged region bordering Mexico. The region's largest city, El Paso, is a major border town supporting trade with Mexico. There is some farming but, because of the desert climate, mainly ranching and grazing. Government and military installations (including Fort Bliss), wholesale and retail distribution, higher education, food processing, and various manufacturing concerns are important elements of the local economy.

Region 13, like the rest of the Rio Grande Valley, is majority Hispanic or Latino. Though home to many who identify as White, Non-Hispanic, a large majority of people in the region identify as White and Hispanic or Latino. Because of this plurality of mixed ethnic identity, the region is very integrated ethnically. However, there are certainly distinct affluent and low-income communities in the region. One of only three federally recognized tribes that reside in Texas, the Ysleta del Sur tribe, resides in El Paso County.

**Figure 3-302: Counties in TDHCA Service, Region 13**

Region 13 is heavily Hispanic. The Hispanic population is projected to grow, and as it grows the region will only become less diverse. The only region with a higher projected percentage of residents identifying as Hispanic in 2050 is Region 11, which is projected to be 95% Hispanic by 2050. Figure 3-303 shows population projections for Region 13.

**Figure 3-303: Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 13, 2010 to 2050**

Source: Texas Demographic Center Population Projections, 2010-2050. May 5, 2018.

## Race and Ethnicity

Figure 3-304 shows the R/ECAPs in Region 13.

**Figure 3-304: Map of R/ECAPS, Region 13, 2024**

Source: U.S. Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

Figure 3-305 shows the Diversity Index by census tract for Region 13.

**Figure 3-305:** Diversity Index, Region 13, 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table B03002.

The entirety of Hudspeth County is considered a R/ECAP, likely because it is overwhelmingly Hispanic and experiences high rates of poverty. Other R/ECAPs in the area are spread throughout El Paso County, particularly close to the border with Mexico and Hudspeth County. In many ways, Region 13 is similar to Region 11, despite the geographic gulf between them. Region 13 is majority Hispanic, so the region as a whole has mostly lower Diversity Index values. There are some census tracts in the El Paso area and north of El Paso with greater equitable distribution of diverse populations.

## Household Characteristics

Figure 3-306 shows the household and family characteristics of Region 13 households.

**Figure 3-306:** Household and Family Characteristics, Region 13, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1101.

Region 13 has the second largest average family household size among all regions. Region 13 has the fourth highest percentage of households with a minor among all regions (behind Regions 6, 11, and 12).

## Income

Figure 3-307 displays the percentage of the regional population by household income category and race and ethnicity for Region 13. Region 13 has the second lowest rate of Black or African American households in the ELI category, at 10.5%, followed by Region 11, with 9.2%. Region 13 also has the highest percent of Black or African American households with incomes greater than 100% AMFI. Like many other regions, just over 30% of Hispanic households have incomes at or below 50% AMFI, and approximately 40% of Hispanic households have incomes greater than 100% AMFI. Hispanic households make up almost 85% of the region.

**Figure 3-307:** Household Income Category by Race and Ethnicity, Region 13, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

## Disability

Of the civilian non-institutionalized population of Region 13, 13.4% has a disability, which is slightly higher than the state's rate of 11.4%.

Figure 3-308 shows prevalence of disability by disability type in Region 13, including hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. The Non-Metro counties of Region 13 has higher rates of hearing difficulties than any other Non-Metro region. With El Paso County and Hudspeth County being the only Metro counties in the Region, in Non-Metro counties, individuals with disabilities likely have to drive a significant distance to access services.

**Figure 3-308: Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 13, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-309 shows the percent of the civilian non-institutionalized population with a disability in Region 13 by gender and age. Higher rates of disability amongst children, males, and females is consistent with the higher overall rate of disability in Region 13 compared to the state. Children in the Non-Metro counties of Region 13 experience lower rates of disabilities than children in the Metro counties of the region.

**Figure 3-309: Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 13, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

Figure 3-310 shows the percent of the civilian non-institutionalized population with a disability in Region 13 by race and ethnicity. Region 13 has the second highest rate of disability among Hispanic or Latino individuals in Metro counties and highest rate of disability among Hispanic or Latino individuals in Non-Metro counties, at 13.2% and 18.3% respectively.

**Figure 3-310: Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity, Region 13, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1810.

## Poverty

After Region 11, Region 13 has the second highest overall poverty rate in the state at 19.4%. Figure 3-311 shows the prevalence of poverty in Region 13 by poverty level.

**Figure 3-311: Poverty Rates by Poverty Level, Region 13, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

Figure 3-312 shows the percent of individuals below the poverty line, or 100% of the federal poverty level, in Region 13 by age, gender, and race and ethnicity. Across demographic groups, with the exception of Black or African American individuals, poverty in Region 13 is higher than each group's statewide average. Compared to other regions, Region 13 has the second highest poverty rate among children, males, females, White individuals, and persons who identify as some other race. More than 1 in 5 Hispanic or Latino individuals live below the poverty line in Region 13.

**Figure 3-312: Poverty Rates by Age, Gender, Race and Ethnicity, Region 13, 2017 to 2021**

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table S1701.

## Employment

Figure 3-313 and Figure 3-314 show the share of job counts and job counts by distance between the Work Census Block and the Home Census Block of individuals in the El Paso, TX CBSA. Work Census Blocks are all located within the listed CBSA, but Home Census Blocks can be located in or out of the CBSA, as long as the job is in the CBSA.

**Figure 3-313: Share of Job Counts by Distance between Work Census Block and Home Census Block, El Paso CBSA, TX, Region 13, 2021**

**Figure 3-314: Job Counts by Distance between Work Census Block and Home Census Block, El Paso CBSA, TX, Region 13, 2021**

Source: Job center information, On the Map data tool 2021, Census.gov.

Region 13 has the lowest rate of people working in the CBSA and driving more than 25 miles to work; approximately 90% of job holders in the CBSA driving less than 25 miles to work. Figure 3-315 shows the employment and living situation of individuals in each county of Region 13. Employment and living situations include being employed in the county but living outside of the county, living and working in the county, and living in the county but working outside of it. El Paso is the job center for the region and contains nearly 94% of the jobs in the entire region.

**Figure 3-315: Employment and Living Situations, Counties in Region 13, 2021**

Source: On the Map data, 2021, with out of state employment data excluded.

Figure 3-316 shows the mean travel time to work for counties in Region 13.

**Figure 3-316:** Mean Travel Time to Work, Counties in Region 13, 2017 to 2021

Source: Commuting to work data from ACS, 2017 to 2021 5YR estimates, Table S0801.

## Housing Profile

Figure 3-317 shows the age of housing stock by county in Region 13 as a percentage of the total housing stock.

**Figure 3-317:** Age of Housing Stock by County, Region 13, 2017 to 2021

Source: American Community Survey 5 Year Estimates, 2017 to 2021, Table DP04.

The housing stock in Region 13 is slightly older than other regions with a large MSA, but not as old as regions with a more prevalent Non-Metro population.

Figure 3-318 shows households in Region 13 experiencing one or more housing problems.

**Figure 3-318:** Percent of Households with One or More Housing Problems, Region 13, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 1.

Compared to other regions, ELI and VLI renter households and Non-Metro owner households in Region 13 have low rates of experiencing at least one housing problem. ELI and VLI owner households in Metro counties have average rates of experiencing housing problems. High rates of experiencing at least one housing problem for LI and MI renter households in Metro counties are significant enough to make LI renter households in Region 13 the most likely to experience housing problems among all LI renter households, despite low rates in Non-Metro counties. Owner households in Region 13 have relatively average rates compared to the rest of the state, with the exception of high rates for MI owners in Metro counties. Figure 3-319 shows renter and owner households in Region 13 that lack complete plumbing or kitchen facilities.

**Figure 3-319:** Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 13, 2016 to 2020

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 3.

Region 13's rates of households lacking complete plumbing or kitchen facilities are relatively close to statewide figures, although significantly lower for VLI renter households and VLI owner households. Figure 3-320 shows renter and owner households in Region 13 that are cost burdened.

**Figure 3-320: Percent of Households Experiencing Cost Burden, Region 13, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 8.

Because the majority of Region 13's population is in Metro counties, this trend carries over to overall renter rates. Owner households have average to slightly above average rates of cost burden relatively close to state figures. Metro households in Region 13 have higher rates of cost burden than Non-Metro households. Figure 3-321 shows renter and owner households in Region 13 that are overcrowded.

**Figure 3-321: Percent of Households Experiencing Overcrowding, Region 13, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 10.

Region 13 has the second highest rates of overcrowding behind Region 11, though Region 13's rates are considerably lower than those of Region 11. Rates are generally higher in Metro counties than in Non-Metro counties, and higher for renter households than for owner households. ELI and VLI renter households in Metro counties have the highest rates among Region 13 households, though rates are higher for VLI than for ELI households. Figure 3-322 shows the average housing costs in Region 13.

**Figure 3-322: Average Housing Costs, Region 13, 2021**

Source: United States Census Bureau Business Builder, Regional Analyst Version 2.4, January 2024.

Among the regions with a large MSA, Region 13 has the lowest average housing costs, as shown in Figure 3-322. Figure 3-323 shows the number of bedrooms in renter and owner occupied housing units in Region 13.

**Figure 3-323: Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities, Region 13, 2016 to 2020**

Source: U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy Data, 2016 to 2020, Table 15a, Table 15b, and Table 15c.

Of total occupied units in Region 13, 70.1% consist of 3 or more bedrooms, the highest percentage among all regions. This is due in part to the particularly high percentage of renter occupied units with 3 or more bedrooms, 15.5% of total units. Only 19.1% of total occupied units in Region 13 consist of 2 bedrooms, the lowest among all regions, which evens out the percentage of units with 2 or more units.

The distribution of unit sizes bears this out, with a large number of units with 3 or more bedrooms available to both renters and owners. Figure 3-324 maps the active multifamily properties in Region 13 participating in TDHCA programs.

**Figure 3-324:** **Map of Active Multifamily Properties Participating in TDHCA Programs, Region 13, 2023**

Source: TDHCA, Central Database, data pull from August 2023.

Not all properties participating in TDHCA programs have all units operating as subsidized units; some units are market rate. The column titled "Active Property Program Unit Count" reflects only the number of rent-restricted affordable units at the properties in a county.

Active multifamily properties participating in TDHCA programs are predominately located in the population and job center of El Paso. El Paso County contains 146 TDHCA multifamily properties, while only 6 exist in all other counties of the region combined. However, since there are fewer than 25,000 people in the Non-Metro counties of Region 13, there is also less need for units.

# Chapter 4 - Review of State-Level Laws, Regulations, and Programs

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

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

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

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

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

The full text of all cited and referenced state level laws, regulations and codes from this chapter can be found at the hyperlinks embedded throughout this chapter.

# Building

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

## State Policy – Occupancy Codes

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

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

## State Policies - Different Types of Homes

## Manufactured Homes

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

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

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

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

## Industrialized Housing

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

Texas Occupations Code, § 1202.253 states that:

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

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

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

address FHAA-protected groups, and any impacts on affordable housing supply or price will have the same impacts on FHAA-protected groups and non-protected groups.

## State Laws on Local Regulations of Buildings

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

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

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

## Local Regulations

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

Texas Local Government Code Chapter 214, relates to municipal regulation of housing and other structures. The chapter covers municipal regulations of dangerous structures, manufactured homes, plumbing and sewers, swimming pool enclosures, building lines, building and rehabilitations codes, registration of vacant buildings, energy conservation, rent control, building permits (only for emergency management), prohibition of requirements regarding sale of housing units and lots to establish a maximum price. Local Government Code §214.219 specifies minimum habitability standards for multifamily rental buildings for large cities like Houston,

though subsection (f) requires a municipality to try to relocate tenants when ordering the closure of a multifamily building due to a violation of the minimum habitability ordinance. Such standards establish the municipal authority to ensure that residential buildings meet a certain safety and building standard, though such regulations may, thereby, indirectly limit the availability of low income housing.

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

Local Government Code §§214.212 and 214.215 require cities (but not counties) throughout the state to use the International Residential Code (May 1, 2012), and National Electrical Code (May 1, 2001), respectively, or rehabilitation codes as the residential building code throughout the state, but provides an ability to adopt local amendments or a different code as long as the resulting code includes provision for building rehabilitation or a separate rehabilitation code.

The adoption of an internationally recognized building code protects public health and safety; it may also possibly result in increases in housing costs, however those may be offset by the efficiencies of using a predictable set of building standards across the state. The requirement for a building rehabilitation code or code provisions is a best practice that tends to maintain a habitable existing housing stock and extend that stocks useful life. In addition, some building codes include a provision for variances or alternative compliance that can be used to respond to requests for "reasonable modification" under the FHAA. For these reasons, building construction codes are seldom targeted as significant impediments to fair housing choice. Neither sections of this statute create barriers to fair housing choice for FHAA-protected persons.

Texas Local Government Code Chapter 244, Subchapter B, relates to Municipal regulation of Shelter for Homeless Individuals. Texas Local Government Code §§244.021 through .023 addresses issues such as spacing and location requirements for homeless shelters, but only applies to cities with a population greater than 1.6 million, which currently applies to Houston, the one large city in Texas that has chosen not to exercise its option to adopt zoning controls. This statute requires a city that has chosen not to adopt zoning to impose zoning-like controls over homeless shelters (which could limit the availability of that housing where it is needed).

However, the regulation then provides that the city may "consent" to exceptions to the spacing requirements (which could minimize the impact of the restriction). Nevertheless, since homeless individuals are not an FHAA-protected group, this does not constitute a violation of the FHAA, although in any given area or locale other factors may result in the homeless population having a high level of overlap with one or more protected classes.

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

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

## Other Homes

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

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

Chapter 247 does not authorize any specific land use treatment of group homes — i.e., it does not limit Texas cities in their zoning authority to permit, or exclude, group homes in residential areas, and it does not give Texas counties zoning-like powers to exclude them. The regulation simply requires that group homes have a state-issued license. While some groups likely to occupy

assisted living facilities, such as persons with disabilities, are FHAA-protected persons, it is quite common for states and/or local governments to establish licensing systems for group home operators in order to protect the health and safety of residents with limited abilities to protect themselves. State and local licensing systems are not intended to restrict the number of assisted living facilities except for reasons of public health and safety, and the facility licensing systems in place by the state are not considered to create barriers to fair housing choice for these groups.

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

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

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

Texas Health and Safety Code, Chapter 591.003. Group homes are regulated by the HHSC. The definition of a Group Home is found in Texas Health and Safety Code Chapter §591.003(10). This statute does not authorize any specific land use treatment of group homes — i.e. it does not limit Texas city zoning authority to permit or exclude group homes in residential areas, and it does not give Texas counties zoning-like powers to exclude them. It simply requires that they have a state-issued license. While persons with cognitive disabilities are FHAA-protected persons, it is quite common for states and/or local governments to establish licensing systems for group home operators in order to protect the health and safety of residents with such disabilities.

Related codes:

- Texas Health and Safety Code Chapter 555 stipulates requirements for state supported living centers for people with intellectual and developmental disabilities.

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

## Restrictive Covenants

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

In the 88th Regular Session the Texas Legislature passed H.B. 1193 creating Texas Property Code Section 202.024 which prohibits discrimination based on tenant method of payment. This new section of property code prevents property owners' associations from enforcing provisions prohibiting or restricting a property owner from renting a dwelling to a person based on the person's method of payment. This includes Housing Choice Vouchers (HCV) and through this policy helps to create more choice in finding a unit for HCV holders if they are able to find a property owner willing to take HCV.

## Programs - Specific Building Requirements

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

## Accessibility

The FHAA offers protection to persons with disabilities to ensure they have equal access to safe and affordable housing options. However, that right may be impaired if the available housing is not accessible to disabled persons (e.g. doors are too narrow to accommodate wheelchairs, or

building entries are located above or below grade level with no means for a wheelchair to accommodate that change in grade). See the "Housing Programs for Persons with Disabilities" section, below, for more details.

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

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

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

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

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

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

## Housing Programs Offered by the State

TDHCA provides a variety of housing programs, including multifamily and single family housing. The agency has published accessibility and reasonable accommodations rules in 10 TAC Chapter 1, Subchapter B, on reasonable accommodations, the Fair Housing Act, construction standards, and requirements for multifamily housing and resources. 10 Texas Administrative Code §1.206 notes the applicability of construction standards with Sec. 504 of the Rehabilitation Act of 1973.

For construction of single family housing funded by the Department, Texas Government Code §2306.514 applies, outlining construction requirements for single family affordable housing. The requirements in this section of code require housing to be built to Texas Visitability Standards.

In addition, reasonable accommodation requirements for single family housing activities are provided in 10 TAC §20.8.

## Integrated Housing

The state addresses integrated housing in several areas. For the Health and Human Services Commission's Voucher Program for Transitional Living Assistance for Persons with Disabilities, Tex. Gov't Code §531.059(a)(2) provides for integrated housing.

Integrated housing allows persons with disabilities to live in the community with full and equal access to a variety of housing opportunities. TDHCA also has an Integrated Housing Rule (10 TAC §1.15) which applies to all multifamily developments funded through the Department.

## Visitability

TDHCA has incorporated visitability requirements into its multifamily rules to ensure expanded choice for tenants (10 TAC §11.101(b)(8)).

## Housing Programs for Persons with Disabilities

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

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

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

Programs are also available for persons with disabilities for home accessibility modifications. For HOME, additional funds are set-aside for units of general local governments, public housing authorities, local mental health authorities, and nonprofit entities that assist households that include a person with a disability. The funds set-aside for persons with disabilities can be used for the TBRA (rental assistance), HANC (acquisition or new construction of single family housing), and HRA (reconstruction of owner occupied housing) activities and may be utilized throughout the state, including within participating jurisdictions.

The Amy Young Barrier Removal Program (AYBR) provides one-time grants of up to $22,500 for Persons with Disabilities who need modifications to increase accessibility and eliminate hazardous conditions in their home. Program beneficiaries must include a Person with Disability, must have a household income that does not exceed 80% of the Area Median Family Income. This program is available to both homeowners and renters.

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

- General Land Office administers the CDBG-DR program. The program allows for the modification of program eligible homes to increase accessibility levels for the homeowner or a family member. A home must qualify for assistance under a CDBG-DR program (such as, single family rehabilitation or single family reconstruction) and modifications are an eligible cost. For example, the necessary elevation of the entire structure and required accessibility ramps and/or chair lifts to accommodate any homeowners with accessibility needs. These types of needs are met for those who require them once they are deemed eligible under other programs.
- Texas Dept. of Agriculture administers Texas CDBG, with housing rehabilitation that offers housing modifications for persons with disabilities being an eligible activity under the Community Development Fund and Colonia Fund - Construction program.

- Texas Veterans Land Board (VLB) provides low interest land loans, and home/home improvement loan to Texas veterans, including accessibility modifications.

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

## Siting

State laws on siting and property taxes, have an impact on the location and affordability of housing. While many regulations reside at the local level, the state does have laws on municipal zoning, platting and other laws that govern such local regulations. Including, Texas Local Gov't Code Chapter 211, Municipal Zoning and Texas Local Gov't Code 212, Municipal Subdivision and property development

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

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

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

Civil Practice and Remedies Code, §125.046, authorizes a court (including a county court) to order the appointment of a receiver to manage a property if it is determined by the court that a person is not maintaining a vacant lot or vacant or abandoned building to abate the nuisance.

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

Such laws giving counties certain authority are fairly typical and in line with laws found in many other states, with one exception. The provisions of Local Government Code Chapter 232 Subchapter B addressing subdivision powers near international borders include significantly more detailed provisions that may "raise the bar" higher than the state applies to non-border counties. Instead of simply authorizing county governments to adopt platting regulations, Subchapter B requires certain counties to adopt certain regulations that could result in water and sewer service requirements higher than those imposed by other counties (although, not necessarily higher than is expected in municipalities) and prohibits county commissioner's courts from approving plats that do not meet those standards. As such, these regulations, while protecting residents and consumers, could, in theory, have the effect of raising land subdivision prices — and therefore housing prices — for those persons living in the area; however, no conclusive evidence is presented that suggests this has occurred.

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

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

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

Texas Local Government Code Chapter 373A.001, Homestead Preservation Districts and Reinvestment Zones, provides for how municipalities can increase homeownership, provide

affordable housing, improve economic and social conditions for disadvantaged communities and protect the homestead interests of low and moderate income families.

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

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

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

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

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

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

In addition, a housing finance corporation may issue bonds to finance a multifamily residential development to be owned by the housing finance corporation if at least 50% of the units in the

multifamily residential development are reserved for occupancy by individuals and families earning less than 80% of the area median family income.

Texas Local Government Code §395.016(g) gives authority for political subdivisions to reduce or waive impact fees for affordable housing.

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

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

State standards that authorize local governments to remove blight and slums through the use of eminent domain, or restrict them from taking those actions, or that authorize them to sell or demolish multifamily housing or substandard housing can affect low-income housing options. A concern with such provisions is the theoretical potential to dislocate disproportionate numbers of FHAA-protected persons without compensation or assistance with relocation under Texas Gov't Code §2206.001(3); however, no conclusive evidence is presented that suggests this has occurred.

## State Housing Assistance and Siting

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

**TDHCA Programs**

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

The Department publishes rules on site and development requirements and restrictions. Such regulations include requirements and limitations with regard to development in floodplains; siting near undesirable site features such as within a certain distance of junkyards, solid waste facilities, etc.; and siting in a location with neighborhood risk factors such as high crime areas or being in a school attendance zone of a school that has not met state standards. The rules also stipulate a point structure for developments that provide mandatory unit amenities such as energy-star appliances or lighting fixtures, storage space, or covered patios, etc.; common amenities such as accessible walking/jogging paths or playscapes; and tenant support services.

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

While the QAP is a product authorized by TDHCA's Governing Board, many of the scoring items included in the QAP are required by statute. Below are a few of those statutory scoring items that could affect siting of proposed developments. Alternatively, the statute provides that if the State Representative provides no letter, the same points may be awarded based on the support of the relevant municipality or county.

Government Code 2306.6710(b)(1)(J) includes an option to provide a letter from the State Representative in which the development resides and requires that the letter be a scoring item.

10 TAC §11.9(d)(5) then assigns a point value to a letter of express support from the State Representative (+8), a neutral statement letter (0), or a letter of express opposition (-8) which results in a 16 point spread of points, which is significant.

**Programs in Other State Agencies**

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

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

## Statewide Planning of Public Transportation

Transportation intersects in a significant way with affordable housing. When households rely significantly on public transportation, this can have an impact on where the household may choose to live. The Texas Transportation Commission and Texas Department of Transportation (TxDOT) use the Unified Transportation Program (UTP) as TxDOT's 10-year plan to guide transportation project development across Texas. The UTP is developed annually in accordance with 43 TAC §16.105, and is approved by the Texas Transportation Commission annually. The UTP is an intermediate programming document linking the planning activities of the Statewide Long-Range Transportation Plan (SLRTP), the Metropolitan Transportation Plans, and Rural Transportation Plan to the detailed programming activities under the Statewide Transportation Improvement Program (STIP) and TxDOT's 24-month (2-year) Letting Schedule.[24]

The Public Transportation Program portion of the Unified Transportation Plan lays out the planning process involving public transportation statewide. TxDOT expects to allocate $45.2 million in state funds in FY 2024-2025 to public transportation across the state. These grants

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[24] Source: Texas Department of Transportation, Unified Transportation Program

include projects like capital investments in bus replacement, job access programs in rural areas, and programs to assist the transportation needs of people with disabilities.

TxDOT itself does not own capital equipment or facilities for use in transit service, nor does it provide actual services to transit passengers. TxDOT does not develop capital projects funded through transit grant funds, but instead manages grant projects that support operating and capital projects implemented by rural and urban transit districts and other eligible entities. The transit program provides the funding authority for public transportation projects through the distribution of federal apportioned dollars and state funds. The Texas Transportation Commission has established funding allocation methodologies for the various programs, and development of these methodologies has been guided by the department's goals. Biennially, the Texas Legislature appropriates state funds, which are also disbursed on a reimbursement basis. For FY 2024-25, this amount is expected to be $45.2 million. Public transportation providers may use their state funds to meet the match requirements of federal grants or for any other public transportation purpose that is allowable under federal or state law. These funds are awarded to rural and urban transit districts, and other eligible entities, by formula. In addition, federal funding is available through Section 5303 and 5304 planning programs, Section 5307 urbanized formula program, Section 5310 Seniors and Individuals with Disabilities Program, Section 5311 non-urbanized program, the 15% set aside for intercity bus, rural transit assistance program, Section 5339 bus and bus facilities program, etc.

In addition, Local Government Code Title 14, Subtitle B, Chapter 615, Subchapter C, details transportation laws including grants, transportation expenses for senior citizens, and other items. In particular, the "commissioners court of a county with a population of 2.2 million or more may pay out of the county general funds costs and expenses for the transportation of senior citizens and their caregivers for civic, community, educational, and recreational activities within and outside the county if a majority of the costs and expenses paid are for the transportation of senior citizens." (Local Govt. Code 615.022)

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

## Social Services

The state offers a wide variety of programs that help persons with disabilities. In particular, the Texas Health and Human Services Commission offers a variety of services to Texans with disabilities that help ensure their well-being, dignity, and choice. Programs also are in place to support family members who care for them. Some programs are targeted at persons with specific disabilities, while others are for independent living or services for persons with disabilities in general. Housing related services from these areas can include tenancy supports, housing

navigators, relocation services, etc. In addition, 2-1-1 Texas, a program of Texas Health and Human Services, is committed to helping Texas citizens connect with the services they need.

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

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

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

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

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

The Texas General Land Office (GLO) oversees long-term disaster recovery through Community Development Infrastructure and Housing projects, including rebuilding and repairing homes and rebuilding infrastructure and community development and revitalization. The Community

Development Block Grants for Disaster Recovery (DR) program allows the GLO to work with local leadership on long-term housing that not only helps to rebuild a community, but lessen the cost and impact of future disasters. The use of best practices and innovative construction in the rehabilitation and reconstruction of impacted housing strengthens the community and ensures community resiliency. More extensive discussion of the GLOs activities are provided in Chapter 9.

Within their DR resources the GLO administers the Multifamily Affordable Rental Housing Program. This program provides for the rehabilitation, reconstruction, and new construction of affordable multifamily housing projects in areas impacted by Hurricane Harvey. The program includes resiliency and mitigation efforts. GLO flooding mitigation efforts include: home elevation, and first floors designed to serve as parking or storage areas with no living spaces to minimize flooding impact.

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

The Texas Veterans Commission administers several other programs. The Fund for Veterans' Assistance (FVA) was established in 2005 by the 79th Legislature and funded in late 2009. The FVA program oversees five grant categories: General Assistance, Housing4TexasHeroes, Veterans Mental Health, Veterans Treatment Courts, and Veteran County Service Office funding. These grants offer funding to non-profit and local government organizations which, in turn, provide direct services to Texas Veterans and their families. Since 2009, the Texas Veterans Commission (TVC) has awarded over $230 million in more than 1,100 grants to non-profit and local government entities. Housing for Texas Heroes Grants (H4TXH) awards grants to eligible organizations that assist Texas Veterans and their families in obtaining, maintaining, or improving housing. Currently, these grants address homeless/housing needs as well as home modification assistance needs of disabled veterans, low income, and very low income veterans. Projects include homeless veterans support, veteran homelessness prevention, home modification assistance, and housing assistance for families of veterans being treated at Texas medical facilities.

Funds were appropriated to HHSC to provide rental assistance and supportive housing through the Local Mental Health Authorities (LMHAs) for individuals who are homeless or at significant risk of becoming homeless. For instance, Projects for Assistance in Transition from Homelessness (PATH) program is authorized under §521 (290cc-21) of the Public Health Service Act. Funds are

distributed on a formula basis by the federal Center for Mental Health Services to the States and Territories. Texas Health and Safety Code §142 stipulates requirements for home and community support services that allow people in need of such services to receive them in their own residence.

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

## Statewide Delivery of HUD CPD Programs Providing Social Services

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

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

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

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

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

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

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

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

The Texas Interagency Council for the Homeless (TICH), codified in Texas Government Code §2306, Subchapter KK, coordinates the state's resources and services to address homelessness. TICH is statutorily established with representatives from nine state agencies along with members appointed by the governor, lieutenant governor, and speaker of the House of Representatives.

The Housing and Health Services Coordination Council (HHSCC), codified in Texas Government Code §2306, Subchapter NN, works to increase state efforts to offer service-enriched housing through increased coordination of housing and health services. The Council seeks to improve interagency understanding and increase the number of staff in state housing and health services agencies that are conversant in both housing and services.

## State Laws – Texas Fair Housing Act

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

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

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

To further protect tenant's rights, H.B. 1099 was passed by the Texas 85th Regular Legislative Session in 2017 to amend Texas Property Code §92.015, which expanded the protection of a

tenant's rights, especially for families, and the ability to summon police or emergency assistance for family violence. In addition, Texas Health and Safety Code §592.016 provides that an "owner, lessee, sublessee, assignee, or managing agent or other person having the right to sell, rent, or lease real property, or an agent or employee of any of these, may not refuse to sell, rent, or lease to any person or group of persons solely because the person is a person with an intellectual disability or a group that includes one or more persons with an intellectual disability."

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

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

Texas Local Government Code §214.903 also authorizes municipalities to adopt fair housing ordinances.

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

The Texas Legislature, in 2015, enacted Texas Local Government Code §250.007 which prohibits (with exceptions) municipalities from enacting ordinances that require leasing property owners to participate in most federal housing programs and accept vouchers. ICP sued Texas Governor Greg Abbott over the enforcement of this law, and the case was dismissed on jurisdictional grounds. *See ICP v. Abbott*, No. 3:2017 CV 00440 (N.D. Tex. 2018)(S. Fitzwater) Doc. 63 (Memorandum Opinion and Order). A year later, the United States Court of Appeals for the Fifth Circuit upheld a previous District Court ruling in *Inclusive Communities Project v. Lincoln Property Company et al.*, 920 F.3d 890 (5th Cir. 2019) and found that refusal to participate in the Housing Choice Voucher Program did not constitute disparate impact or disparate treatment discrimination under the Fair Housing Act.

The Department's governing statute, Tex. Gov't Code Chapter 2306.257, and the Department's administrative rules found at 10 TAC Chapter 1 also incorporate requirements of federal law providing for protections and reducing barriers to fair housing choice.

The Department, in an effort, to ensure that owners, on-site property managers, engineers, and architects are aware of and following all fair housing laws, rules, and regulations, requires these

stakeholders to complete 5 hours of TDHCA-approved fair housing training per 10 TAC §11.906(1) and §11.906(2).

## State Insurance and Banking Laws

### Insurance

Access to insurance is an important aspect of one's ability to own and maintain a home, or protect the contents of a leased unit. Texas Insurance Code Chapter 544 clarifies general prohibitions against discrimination by an insurer, including title insurance companies. A person may not refuse to insure or provide coverage to an individual, refuse to continue to insure or provide coverage to an individual, limit the amount, extent, or kind of coverage available for an individual, or charge an individual a rate that is different from the rate charged to other individuals for the same coverage because of the individual's:

(1) race, color, religion, or national origin;
(2) age, gender, marital status, or geographic location; or
(3) disability or partial disability.

In addition, under Texas Insurance Code §560.002, a rate is unfairly discriminatory if the rate:

(A) is not based on sound actuarial principles;
(B) does not bear a reasonable relationship to the expected loss and expense experience among risks; or
(C) is based wholly or partly on the race, creed, color, ethnicity, or national origin of the policyholder or an insured.

Texas Insurance Code §§3502.053 and 3502.102 also clarify the prohibitions on discrimination in mortgage guaranty insurance, another important component of being able to buy a home, especially for low-income or first time homebuyers who do not have significant funds for large down payments. That section provides that in extending or issuing mortgage guaranty insurance, a mortgage guaranty insurer may not discriminate on the basis of the applicant's sex, marital status, race, color, creed, national origin, disability, or age or solely on the basis of the geographic location of the property to be insured unless:

(1) the discrimination related to geographic location is for a business purpose that is not a mere pretext for unfair discrimination; or
(2) the refusal, cancellation, or limitation of the insurance is required by law or regulatory mandate.

§3502.102 further provides that:

(a) A mortgage guaranty insurance rate, rating plan, or charge may not be excessive, inadequate, or unfairly discriminatory and must be reasonable with respect to the benefits provided.

(b) This chapter does not require the department to:

(1) establish standard and absolute rates or a single and uniform rate for each risk or risks; or

(2) compel all insurers to adhere to rates previously filed by other insurers.

(c) The department may accept different rates for different insurers for the same risk or risks on mortgage guaranty insurance. The department may accept different rates for different insurers as filed by any authorized insurer unless the department finds that the filing does not meet the requirements of this chapter.

The Texas Department of Insurance Bill of Rights, which is posted on the agency's website, has listed the protected class and protections offered.

In addition, Texas Insurance Code Chapter 2004 requires designation of underserved areas for residential property insurance. 28 TAC, §§5.3700 and 3702 have designated specific underserved areas for residential property insurance. Factors for considering an area as underserved takes into account low median household income, low median value of homes, and older median age of homes. Such considerations help mitigate the risk that people living in specific areas may not be served.

Insurance underwriting requirements, determined by the private sector, may create barriers to fair housing choice if they discourage or prohibit property features or management practices necessary to accommodate the needs of FHAA-protected groups.

## Banking

Texas banking and mortgage laws are governed by the Texas Finance Code. Specifically, in Texas Finance Code, §156.303, the "Department of Savings and Mortgage Lending may order disciplinary action against a licensed or registered residential mortgage loan company or a licensed residential mortgage loan originator when the commissioner, after notice and opportunity for hearing, has determined that the company discriminated against a prospective borrower on the basis of race, color, religion, sex, national origin, ancestry, familial status, or a disability." In addition, Texas Finance Code §§341.401 and 341.402 cover prohibitions and violations for discrimination in banking.

## Real Estate

Protections of real estate transactions are specified in Texas Property Code, Chapter 301. In addition, Texas Real Estate Commission, by rule, prescribes the content of the qualifying real estate courses listed in statute for real estate agents and brokers, which requires 150 minutes of

education in fair housing laws (Texas Occupations Code 1101 and 22 TAC §535.64). The Commission may also suspend or revoke a license issued under this chapter or take other disciplinary action authorized by this chapter if the license holder, while engaged in real estate brokerage, commits any of the listed violations in §1101.652.

For the purpose of regulating real estate brokers and agents, disability includes AIDS, HIV-related illnesses, or HIV infection as defined by the Centers for Disease Control of the United States Public Health Service (22 TAC §531.19).

## Taxation

Property taxes are one of the significant operating expenses for affordable rental properties. Nonprofit organizations, if qualified and eligible, may have a tax advantage under certain state laws that allow specific entities to be exempted from some or all property taxation if those entities fulfill certain conditions. In addition, local tax policy can encourage or discourage the development of affordable housing in jurisdictions by setting higher or lower capitalization or "cap rates" to calculate property tax assessments. The cap rate is determined by dividing the property net operating income by its sales cost. Affordable housing developments by design have lower net income flows than similar properties operating at market rates and pay lower taxes.

Tax laws, which give tax breaks and exemptions to certain homeowners, and developers, that may impact the affordability of housing are listed below:

Texas Tax Code §11.181, Charitable Organizations Improving Property For Low-Income Housing

Texas Tax Code §11.182, Community Housing Development Organizations Improving Property For Low-Income And Moderate-Income Housing: Property Previously Exempt

Texas Tax Code §11.1825, Organizations Constructing Or Rehabilitating Low-Income Housing: Property Not Previously Exempt

Texas Tax Code §11.1826, Monitoring Of Compliance With Low-Income And Moderate-Income Housing Exemptions

Texas Tax Code §11.1827, Community Land Trust

Texas Tax Code §11.13, Residence Homestead

Texas Tax Code §11.26, Limitation Of School Tax On Homesteads Of Elderly Or Disabled

Texas Tax Code §11.261, Limitation Of County, Municipal, Or Junior College District Tax On Homesteads Of Disabled And Elderly

Tax limits placed on homesteads of the elderly and disabled persons reduce the taxes to be paid and thereby can prevent a low-income household from being displaced due to increasing taxes. This facilitates affordability for those vulnerable populations and allows persons in those groups to be able to afford to stay in their property. This is particularly useful in neighborhoods experiencing significant change and increases in market demand and property value. As values increase those on fixed incomes, most likely seniors and disabled persons, are unable to afford the rising property tax costs. Tax Codes §§11.13, 11.26, and 11.261 make homeownership more affordable for persons with disabilities, a protected class under FHAA.

## Conclusion

Texas state laws and programs provide significant considerations for protected classes and do not reflect discriminatory practices; while some Texas laws do authorize – or do not prohibit – local actions that could lead to local decision-making practices that may affect protected classes, those laws do not themselves treat protected classes differently.

Although there are Texas statutes that help improve the accessibility of housing units for persons with disabilities, some number of Texans may not understand or may not be aware of particular fair housing laws and rights, as evidenced by the number of fair housing complaints that are based on persons with disabilities as a protected class. In addition, the data in Chapter 6, relating to Housing Programs and Portfolio Analysis, seems to indicate that more accessible housing units may be needed.

# Chapter 5 - Review of Prior and Current Actions Taken to Affirmatively Further Fair Housing

## Previous Impediments to Fair Housing Choice

This chapter reviews the impediments to fair housing choice identified in the 2019 Analysis of Impediments to Fair Housing Choice (AI) in Texas and describes the documented actions taken by the Texas Department of Housing and Community Affairs (TDHCA), Texas Department of Agriculture (TDA), Department of State Health Services (DSHS), General Land Office (GLO), and Texas Workforce Commission – Civil Rights Division (TWC-CRD) to address the effects of the identified impediments.

The 2019 AI identified the following five impediments to fair housing choice in Texas:

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

2. There is a lack of understanding and awareness of fair housing law, rights, and duties available to local governments, stakeholders, and the public about fair housing requirements and programs to assist low-income residents and persons with disabilities.
3. Protected classes may experience obstacles in accessing homeownership and lending products.
4. The scarcity and location of accessible and visitable housing units limits fair housing choice for persons with disabilities.
5. There are barriers for specific protected classes that may limit mobility and free housing choice.

# Actions Taken by State Agencies

This section describes documented actions completed or actions currently underway by State HUD Community Planning Development (CPD) recipients to address the corresponding impediments related to their jurisdiction and programs in the applicable AI.

## Texas Department of Housing and Community Affairs

TDHCA has identified major activities that it has undertaken in response to recommendations made in the 2019 AI. Some of these activities may address multiple recommendations, and as a result may appear more than once in this listing. This organization reduces repetition of actions that would occur when listing actions listed by impediments.

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

Impediments Addressed: 1, 4, and 5

Site and Neighborhood Reviews - Staff in the Housing Resource Center (HRC), which assumed the roles of the former Fair Housing Data Management and Reporting team (FHDMR), continued to provide secondary reviews of site and neighborhood reviews for all HOME, HOME-ARP, and NHTF multifamily applications. HRC staff not only conducted these reviews, but also sought to identify trends in the siting of applications such as the applicant citing an overriding need for the property, or that there is limited availability of comparable opportunities in areas of minority concentration. Between July of 2019 and October of 2023, staff conducted 69 secondary reviews and identified that 18 of those 69 applications were sited in areas that had greater minority concentration than that of the larger surrounding market area. These applications were either pulled from consideration by the applicant or the applicant submitted documentation that demonstrated an overriding housing need in the area. In no cases was a census tract identified both as an area of minority concentration and as the site for more than one applicant.

Qualified Allocation Plan (QAP) – TDHCA staff continue to make small, but important changes to the Qualified Allocation Plan from year to year in order to drive affordable housing to high opportunity areas and to keep its Low Income Housing Tax Credit awards from concentrating affordable housing in primarily low-income neighborhoods. As part of this process, TDHCA staff host several roundtables and receive public comment on how to refine the QAP, and remain responsive to stakeholder concerns and needs.

Section 811 – TDHCA's Section 811 staff established a standard operating procedure for how to process reasonable accommodation requests made to the program by clients. As the program grew, requests to the program also increased in frequency. Part of this procedure educates clients on where a reasonable accommodation request should be directed. These requests were often made to the Department yet should have been made to the property where the client resided. Having a standard practice to guide clients to the right place reduced inadvertent or improper evictions or non-renewals. Section 811 program staff also implemented various policy innovations to incentivize TDHCA-monitored properties to participate in the 811 program. These innovations included the use of "barrier busting" funds to help properties cover the cost of unit repairs, and was also instrumental in reducing the stigmatization of the program's clients. TDHCA was also awarded additional funds from a 2019 Notice of Funding Opportunity (NOFO) from HUD, which reflects TDHCA's interest in continually seeking out additional funds that maximize housing choice. Additionally, staff have recently applied for the 2023 Notice of Funding Opportunity from HUD working closely with the Department's Fair Housing Coordinator and HRC to ensure this application satisfied the NOFO's affirmative marketing requirements. Overall, this program provides high opportunity and stable housing to groups that have historically had difficulties finding and keeping stable housing in high opportunity areas.

Section 8 – In working with local stakeholders and examining the needs of tenants with disabilities across the state, the Department had previously created the Project Access Pilot, in which 10 of 140 vouchers offered through Project Access are made available in partnership with Texas DSHS and HHSC to assist persons exiting state psychiatric hospitals. All 10 pilot vouchers are in use as of November 2023, with 1 applicant on the waiting list. In collaboration with Health and Human Services, TDHCA staff are working with HHSC to assist with statewide outreach.

Department Staff have developed relationships with staff at state hospitals and other key referral organizations for the Project Access Program. Examples include Austin Resource Center for Independent Living (ARCIL) the Center on Independent Living (COIL) in San Antonio, North Texas Council of Government (NTCOG), Coastal Bend Center of Independent Living (CBCIL), and Superior Health. Staff have ongoing discussions with stakeholders regarding program eligibility, required forms for submittal, and helpful tips on dealing with other Public Housing Authorities and waiting lists to ensure Project Access clients have as much guidance as possible in exiting institutions.

After a review of household and affordability data and based on feedback from program participants, the Section 8 program determined that in some cases the fair housing choice of assisted households is limited by voucher payment standards; TDHCA began using the small area FMR standards (higher standards for certain high opportunity census tracts) to enable household use with maximum choice and limited barriers. The plan was formally adopted at the November 6, 2016, TDHCA board meeting. The continued use of Small Area Fair Market rents and geographically targeted waivers to exceed 110% maximums was most recently adopted in November 2023.

Beginning in 2019, the Fair Housing Team's staff provided assistance to the Department's Section 8 program in identifying specific covered areas with particularly high rent burdens for its Housing Choice Voucher holders. The Department was able to consult with HUD and request waivers to exceed the usual maximum allowable payment standards. This research and implementation helped to make several zip codes in high demand, high opportunity areas affordable for the Department's voucher holders, and was implemented several years before HUD introduced its Public and Indian Housing Information Center (PIC) tool for PHAs.

On October 1, 2023, the U.S. Department of Housing and Urban Development (HUD) released a final rule in the Federal Register providing that for certain specific areas Small Area Fair Market Rents (SAFMRs) must be utilized. SAFMRs were created by HUD, in response to increasing demand for more localized measures of rents, and are published at the ZIP code level for all metropolitan areas. SAFMRs, by being more localized seek to provide clients with access to a broader range of neighborhoods, thus allowing them to move into areas with more employment, transportation and educational opportunities. This rule affects 32 counties in the Department's Housing Choice Voucher Program (HCV) jurisdiction. These new payment standards were approved by the Board at the November 7, 2023, TDHCA board meeting.

Amy Young Barrier Removal Program – The Amy Young Barrier Removal Program assists households that have a member with a disability pay for accessibility modifications that make it possible for households to remain in place, despite barriers to accessibility. This program is funded entirely by the State of Texas and is an affirmative measure by the State to increase the provision of accessible and affordable housing and to reduce displacement of vulnerable and protected populations.

The Department's Homebuyer programs (Texas Homeownership Program, HOME Homebuyer Assistance with New Construction, and Bootstrap) engage with Limited English Proficiency (LEP) populations as a normal course of marketing. Marketing materials are available in both English and Spanish for these homebuyer programs.

Previously, the Department's single family rules allowed for alternative means of demonstrating credit in the event that a single family household had limited or no credit available at application. Alternative means of demonstration included references from rental housing, utility companies,

and landline phones. The intention behind this flexibility is to remove barriers to program access for low-income persons and persons with disabilities. The Department now only considers derogatory credit, so households with little to no established credit are not precluded from participation in SFHP mortgage loan programs.

The HOME Program under Homeowner Rehabilitation (HRA), Contract for Deed, and Single Family Development activities permits up to $15,000 in direct costs in excess of the program maximum to be requested for homeowners requesting accessible features and for large families. This rule appears in HOME rules, 10 TAC §23.31(e)(1), §23.41(f), §23.61(g).

The Legislature provided for use of Texas State CDBG grant allocations for the express purpose of providing housing assistance to colonia residents through the Colonia Self-Help Centers in 1995. There are now eight Colonia Self-Help Centers along the Texas-Mexico border region in the following counties: El Paso, Maverick, Val Verde, Webb, Starr, Hidalgo, Nueces, and Cameron/Willacy. The Colonia Self-Help Centers provide a range of assistance to Colonia residents and reduces barriers for Colonia residents seeking to apply for funds under various housing programs and other TDHCA low-income and disability programs. Materials provided at the Colonia Self-Help Centers are provided in English and Spanish.

The Homeless Housing and Services Program (HHSP) provides funding to the nine largest cities in Texas and can fund a range of activities including construction, development, or procurement of housing for homeless persons; rehabilitation of structures targeted to serving homeless persons or persons at-risk of homelessness; provision of direct services and case management to homeless persons or persons at-risk of homelessness; or other homelessness-related activity as approved by the Department. TDHCA's rules allow for each of the nine HHSP Subrecipients adopt income limits which do not exceed moderate income level for re-certifications within 12 months after initial intake for homelessness prevention or homeless assistance.

The Emergency Solutions Grants Program (ESG) provides funding for homeless services. 2023 ESG NOFA included a scoring criterion that awarded points under a competitive application to entities that specifically included one or more colonias within the service area of the applicant. This criteria will be part of NOFAs yearly. Applicants are required to market their services to the entire service area. Inclusion of colonias in the marketing area informs colonia residents of the services available to them under the ESG Program.

The contract between the Department and its ESG subrecipients requires that subrecipients provide program applications, forms, and educational materials in both English and Spanish and other languages as appropriate for the service area. ESG staff provided additional guidance for LEP provisions through a webinar and sample Language Access Plan (LAP). The forms used by program participants have been translated into Spanish and are posted online. Those forms include the Income Screening Tool, Income Certification, Request for Unit Approval, and Rental Assistance Agreement. A LAP is required of all subrecipients starting with fiscal year 2016 awards

and continues to be a requirement. Spanish is a mandatory language for all LAPs. The 2023 ESG Notice of Funding Availability (NOFA) included a scoring criterion which awarded points under a competitive application to entities with a staff member that is fluent in one or more languages identified with their LAP.

Texas Rent Relief (TRR) – One of the pandemic-related programs administered by TDHCA, Texas Rent Relief (TRR) disbursed over $240,000,000 to over 25,000 households in order to avoid eviction and displacement through the Texas Eviction Diversion Program. Overall, TRR assisted over 320,000 households with over $2.2 billion in rent and utility assistance and arrears.

Texas Homeowner Assistance Fund (HAF) – Similar to TRR, HAF was able to assist nearly 56,000 Texas homeowners with mortgage, property taxes, utilities, and HOA fees. All together, as of November 2023 HAF has provided almost $650,000,000 in aid to Texas homeowners to help keep them in their houses, reducing homeowner displacement statewide.

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

Impediments Addressed: 1, 2, 3, 4, and 5

2019 Fair Housing Education and Outreach Grant (FHEO) – TDHCA applied for and was awarded a general component grant under the 2019 Fair Housing Education and Outreach Initiatives Program at HUD. With this grant, TDHCA hired a Fair Housing Trainer to revise, generate, and present webinars on six different fair housing topics: a fair housing overview, reasonable accommodations and modifications, assistance animals, language assistance, affirmative marketing, and the Violence Against Women Act (VAWA). All six of these trainings received HUD review and were approved by HUD staff. Fair Housing Month webinars were presented in conjunction with the Texas Workforce Commission's Civil Rights Division.

Over the four quarters of the grant period, TDHCA staff presented the HUD-reviewed trainings in webinar form and had 1,600 attendees. During that same timeframe, staff also provided trainings tailored to the following TDHCA partners and subrecipients:

Habitat for Humanity Texas – 9 attendees
Collinwood Apartments – 5 attendees (logged in on two individual email addresses)
Colonia Self Help Centers – 21 attendees
HOME-ARP administrators and subrecipients – 29 attendees
Austin Tenant's Council – 10 attendees
TDHCA Section 8 Staff – 8 attendees
ESG Subrecipients – 119 attendees

These customized trainings allowed TDHCA staff to focus on issues that most impacted these specific groups or program models. For example, the presentation to TDHCA's Section 8 staff

focused on the implementation of a random neutral selection process to select applicants from the program's waitlist, in order to avoid possible bias against households with minor children and households with a person who has a disability, as pursuant to HUD FHEO guidance from April 2022. Those two groups have been shown in research to be less likely to be selected when a first-come-first-served methodology is implemented.

In addition to these live webinars, the recordings are available on the TDHCA YouTube page and on the GoToWebinar platform. The videos on the GoToWebinar platform were viewed 1,096 times since October 2020, and the YouTube videos were viewed 4,700 times since May 2021. All of the videos on YouTube and most of the videos in GoToWebinar include captions and some also include ASL interpretation in conjunction with captioning.

Staff were also able to generate and print a double-sided English and Spanish brochure concisely explaining fair housing and contact information for individuals who may need to know how to file a fair housing complaint. The fair housing team provided the brochure in both English and Spanish and contracted a printer to produce the brochures, one side in English and the other in Spanish. A statewide 4-factor analysis was conducted for translation of the digital version of the brochure. This analysis indicated that translation should be completed for the following nine languages: Spanish, French, German, Russian, Korean, Chinese, Vietnamese, Tagalog, and Arabic. However, the cost of translation to nine languages and added complication of having at least five different versions also was considered in the Four Factor Analysis. Because costs were prohibitive, only the Spanish translation was commissioned. PDF versions of the brochure were posted on the TDHCA website for download. Approximately 30,000 copies of the brochure in English and Spanish were mailed to 1,750 organizations that work with low-income Texans. The English and Spanish PDF versions of the brochure were posted to TDHCA's website on August 11, 2021. Additionally, TDHCA emailed the same list of organizations to provide them with electronic copies of the brochures as well. The brochure was housed electronically on three different pages of the TDHCA website (Main, Downloads, Announcements). Using additional TDHCA funds, staff were able to print an additional 20,000 copies of the brochure with a QR code that directed viewers to TDHCA's fair housing presentations page.

This grant also allowed TDHCA to initiate an advertising campaign on social media to increase the reach of its trainings. Through the 31 days of the campaign, TDHCA's Fair Housing Training Presentations page saw 5,796 page views. In the entire month prior to the campaign, the page had seen only 97 views. In addition to promoting the free training presentations and the Fair Housing Brochure, staff produced topic-specific FAQ's using the approved training materials from prior quarters. These FAQs were produced in both English and Spanish and were housed on the Department's Downloads page, which saw 274 page views in August, compared to 207 in July. Similarly, traffic to the Fair Housing main page was up significantly. In July, the main page had 3,076 views, while it had 4,611 in August, an approximately 50% increase.

2021 Fair Housing Education and Outreach Grant Application – In 2021, fair housing staff at TDHCA applied for another FHEO general component grant in order to expand upon work done in the 2019 grant period. While TDHCA was not awarded a grant, the Department was making proactive efforts for bringing additional fair housing funds to Texas, and staff built the foundation for future grant applications.

2022 Fair Housing Education and Outreach Grant – In 2022, staff applied for and were awarded their second FHEO general component grant. Just like the 2021 application, staff planned to extend the work from 2019 and further bolster the reach and quality of available educational materials. Staff will be working under this grant until July 2024. Plans for the grant funding include the creation of at least 6 professionally produced short-form videos that cover the basics of different fair housing topics, and direct viewers who are interested in more in-depth information to the 2019 HUD approved trainings. All trainings are updated as new guidance from HUD is promulgated. Rather than hire a Fair Housing Trainer, TDHCA will use the grant funds to engage in a more widespread advertising campaign not primarily focused on social media. Current options include billboards, advertising on public transit, and advertising in smart phone apps.

Fair Housing Month Activities – Every April, TDHCA staff collaborate with Texas Workforce Commission staff to provide live webinars on fair housing issues ranging, including reasonable accommodations, modifications, assistance animals, language assistance, affirmative marketing, and VAWA. These sessions include ample time for audience questions both during and at the end of the webinar. These webinars are also recorded and available to view on-demand. These webinars regularly have over 200 attendees, and are generally well received by tenants, property managers, and compliance staff.

November Fair Housing Series – Every November from 2019 through 2022, TDHCA staff have offered additional webinars, mirroring the sessions available in April for Fair Housing Month. While not quite as popular as the Fair Housing Month series, these webinars are also well-attended with well over 100 attendees for nearly every session.

On-Demand trainings – TDHCA staff have responded to several requests from both internal program areas and external stakeholders for specific requests. These include trainings on the applicability of the Fair Housing Act to the Emergency Solutions Grant Program (ESG), a training on why and how to implement neutral random selection processes in waitlists, affirmative marketing for single family programs and for multifamily programs, and a fair housing overview for a property management company and a group from Habitat for Humanity.

Contact Information – Staff created a direct fair housing email address Fair.Housing@tdhca.texas.gov. Property management, tenants of TDHCA properties, and any other Texan interested is able to request technical assistance with fair housing related matters. Since February 2021, this inbox has received approximately 500 emails, most of which are requesting some sort of information or assistance with a fair housing matter. All emails to this

inbox are responded to promptly and with relevant information such as how to file a complaint with TWC or guidance documents.

Library of Fair Housing Guidance – Staff maintain a folder of the most current HUD and DOJ guidance on fair housing issues, along with additional resources such as pertinent slides from TDHCA's reasonable accommodations trainings and assistance animal trainings.

The Section 8 Program continues to provide Fair Housing guidance to both prospective tenants and property Owners/landlords in the form of Fair Housing information packets and briefings to tenant and new landlords. The packet is periodically reviewed and updated.

Department staff that oversee the ESG Program, with the help of the Fair Housing Team and Legal, drafted a comprehensive Fair Housing training component to be presented during the ESG Implementation Workshop each year. Training components included detailed discussions of all civil rights laws related to ESG, Americans with Disabilities Act (ADA) requirements for shelters, reasonable accommodation requirements, equal access guidance, LEP guidance, and information on affirmative outreach provisions. This training is updated and provided annually. The Implementation Workshop materials are updated and provided as needed. The workshop materials were last updated and presented live in 2021 and are posted on the TDHCA website.

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

Impediments Addressed: 1, 2 and 5

Language Access – All TDHCA staff have access to on-demand live translation services by phone in dozens of languages. This makes TDHCA's programs more accessible and welcoming to all Texans, regardless of their proficiency in English.

Bostock v. Clayton and Executive Order 13988 – TDHCA's fair housing staff have kept up to date with the relevant memos and orders and correctly identify sexual orientation and gender identity as part of the protected class of sex in all trainings and have required this same inclusion for its trainers for the 10% Test for Housing Tax Credits and Loan Closing Documentation for property owners and managers and architects and engineers.

Violence Against Women Act (VAWA) – All complaints that mention VAWA protections are immediately moved to a privileged folder with tightly restricted access. Only the most relevant staff (Fair Housing Coordinator, legal counsel, main staff working on the complaint) have access to the folder to protect the identity and confidentiality of the complainant. When referring VAWA complaints to TWC when there is suspected discrimination based on VAWA protected status or retaliation, staff only use a secure, encrypted email and transfer file through a secure FTP server that only the director of TWC-CRD and housing investigations supervisor have access to.

Fair Housing Training Webinars – All fair housing training materials are reviewed prior to any webinar session to ensure that all language is in keeping with the current standard for inclusive language. Examples given in webinars use primarily non-gendered language and only identify race, ethnicity, national origin, sex, color, or religion when explicitly necessary for the example at hand.

Program and Policy Language – When discussing TDHCA's programs, every attempt is made by staff to use judgment-neutral, positive language, avoiding stigmatized terms such as "subsidized housing," "housing projects," etc. Instead, staff tend to refer to programs by their names, and properties that participate in those programs are linked to the program, rather than generic terms. For example, properties that received Low Income Housing Tax Credits are usually referred to by that program name or are simply called "TDHCA-monitored properties."

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

Impediments Addressed: 1, 2, 3, 4, and 5

Memorandum of Understanding with TWC – TDHCA maintains a Memorandum of Understanding (MOU) with TWC-CRD. The MOU lays out in detail the process for referring a complaint to TWC, including an automatic referral of any complaint that still has outstanding fair housing concerns after the Texas Administrative Code required 90-day corrective action period. This MOU was updated in 2020 to further include more reporting of TWC complaints involving TDHCA monitored properties. In 2023, TDHCA staff submitted the MOU to HUD for review as part of its 2022 FHEOI grant application package.

TWC Monthly Federal Funds Reports – TDHCA receives monthly reports from TWC on all TWC-resolved complaints that involve any property or tenant that receives federal funds, including housing tax credits. TDHCA staff upload any conciliation agreements or judicial orders to the Departments Compliance Monitoring and Tracking System, and those items are then considered in any future applications by the owner as part of the Department's Prior Participation Review.

TDHCA Enforcement Committee – TDHCA's Enforcement Committee now includes the current Fair Housing Coordinator as a voting member. The Enforcement Committee deliberates on property owners, managers, and developers who have outstanding non-compliance with TDHCA's rules. Some of those rules include the application of Section 504 of the Rehabilitation Act to Low Income Housing Tax Credit awards made after 2001 and rules on how a property that participates in a TDHCA-monitored program must handle requests for reasonable accommodations. This includes setting a 14-day period for response and denoting four specific types of responses that a property may have to a request.

Written Policies and Procedures Reviews – In May 2020, the responsibility to review property written policies and procedures was moved from the Compliance division to the Fair Housing

team at TDHCA. This process kicked off with a broad effort to recommend that property management companies create portfolio-wide templates for their written policies and procedures and submit these templates for review by the Fair Housing Team at TDHCA.

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

Impediments Addressed: 1, 2, 3, 4, and 5

<u>Sought HUD input on training materials</u> – As part of the Fair Housing Education and Outreach grant, TDHCA produced six new webinars. All six were submitted to HUD for review and input. Feedback received from HUD was incorporated into the webinars.

<u>Sought input from HUD</u> on questions pertaining to Written Policies and Procedures – While reviewing written policies and procedures on properties it monitors, TDHCA encountered several policies that it found unclear, including criminal screening of minors and waitlist preferences. In those cases, TDHCA sought input from HUD to clarify these questions.

<u>Consultation with Texas Workforce Commission</u> – TDHCA's fair housing staff are regularly in contact with the TWC's Civil Rights Division. Each April, TDHCA and TWC co-presented Fair Housing Month webinars including live question and answer sessions so that attendees could hear responses from both and enforcement agency (TWC) and an agency that administers affordable housing programs (TDHCA).

<u>Sharing property information</u> – Starting in 2023, TDHCA staff began preparing a list of all of its properties that receive state or federal funds or tax credits and sharing that list with TWC staff so that they were able to identify properties that were required to abide by Section 504 of the Rehabilitation Act while investigating a complaint. This also reduced the need for TWC to ask about every property that TWC staff suspected might participate in a TDHCA-monitored program, reducing the amount of time to handle a complaint in general.

<u>Monthly Reports from TWC</u> – TDHCA receives monthly reports from TWC that list complaints against properties that participate in TDHCA-monitored programs or properties that receive federal funds. This report helps TDHCA staff identify areas of concern, even when a complaint is not filed directly with TDHCA.

<u>TDHCA communication with the Office of the Governor</u> – Staff have been able to increase the provision of information between TDHCA and the Governor's Committee for People with Disabilities. This committee has requested trainings and TDHCA staff presence on webinars that the committee presents. This has allowed TDHCA to expand knowledge of its portfolio of properties and programs outside the Department, such as the Amy Young Barrier Removal Program.

## Texas Department of Agriculture (TDA) – CDBG Program

This section reflects TDA's efforts to affirmatively further fair housing and promote fair housing choice, and is categorized by each impediment identified in the 2013 Phase II AI, followed by the steps TDA has taken to address those impediments.

**Impediment 1 - Not in My Backyard Syndrome (NIMBYism) can create barriers to housing choice for protected classes in some communities.**

TDA provides Fair Housing information on its website, including the regulatory basis for Affirmatively Furthering Fair Housing, suggestions for AFFH activities, and contact information for filing fair housing complaints. NIMBYism is not a common discussion point for TxCDBG projects. TxCDBG projects fall into several categories:

- Target area projects that specifically benefit the neighborhood where the construction takes place;
- Projects that benefit all residents of the community that take place at existing infrastructure locations like water treatment plants; and
- Other community-wide projects.

The first two types of TxCDBG projects are relatively unlikely to trigger NIMBY concerns. Local government approval is required for all projects, as the local government is the applicant, and at least one public hearing is mandatory before and after each project. In the rare instance that NIMBY concerns are raised, TDA will require the community to address the issue to the agency's satisfaction prior to approving the project.

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

TDA hosted a booth at the 2017 and 2018 TML conference, themed "What is in your Fair Housing Toolbox" to inform local leaders of the obligations and opportunities to impact fair housing choice. TDA participated in the State Fair of Texas, hosting a booth in the Food and Fiber / Go Texan Pavilion in 2015 and 2016, and posting signage in the pavilion in 2017. The TDA website and TxCDBG Implementation Manual direct those seeking to file Fair Housing complaints to HUD and/or the Texas Workforce Commission. Stakeholders with questions about fair housing requirements can also contact TDA's Fair Housing and Civil Rights Specialist on the TxCDBG compliance team. All TxCDBG subrecipients are required to take action to inform the public and affirmatively affirm fair housing. These requirements are documented in the TxCDBG Implementation Manual, Chapter 10.

All TxCDBG administrators (the point of contact for each grant contract) are required to complete training annually, which includes fair housing information including suggested fair housing activities that can be conducted. In addition, TDA began offering a monthly webinar series called CDBG Over Coffee – the 2018 April topic was "Fair Housing." TDA hosted a booth at the 2017 and 2018 Texas Municipal League (TML) conference, themed "What is in your Fair Housing Toolbox" to inform local leaders of the obligations and opportunities to impact fair housing choice. TDA participated in the State Fair of Texas, hosting a booth in the Food and Fiber / Go Texan Pavilion in 2015 and 2016, and posting signage in the pavilion in 2017. TDA participated in the Rodeo Austin hosting a booth in 2017.

**Impediment 4 - Protected classes may experience disparities in home mortgage loan denials and high cost loans.**

TDA included an article in their April 2018 E-zine, *Go Texan,* on the mortgage lending process. TDA does not frequently fund homeownership activities. Housing rehabilitation activities, although rarely included in TxCDBG applications, usually prioritize owner-occupied housing for elderly and/or disabled persons. Housing rehabilitation activities are more likely to be requested under the Colonia Fund. While TDA does allow for rehabilitation of non-profit owned units, this activity has yet to be requested in an application.

**Impediment 5 - Lack of accessible housing and visitability standards limits fair housing choice for persons with disabilities.**

TDA encourages housing rehabilitation projects, which typically prioritize homeowners with disabilities, in the Community Development Fund, a TxCDBG program, and Colonia Fund. These programs attempt to increase accessible and visitable housing in rural Texas.

**Impediment 6 - There are barriers to mobility and free housing choice for protected classes.**

All TxCDBG subrecipients are required to take action to inform the public and affirmatively affirm fair housing. The most common actions include supporting city ordinances and county resolutions addressing fair housing choice.

TxCDBG Planning and Capacity Building grant recipients include fair housing elements in several planning components, including housing inventory analysis, capital improvement needs planning, analysis of zoning ordinances, and overall planning strategies.

Some TxCDBG projects address fair housing choice by providing first time utility services to improve living conditions in existing communities. These projects benefitted 1,864 individuals in 2016 and 2,100 individuals in 2017.

## Texas Department of State Health Services (DSHS) Housing Opportunities for Persons with AIDS (HOPWA) Program

This section reflects DSHS's efforts to affirmatively further fair housing and increase fair housing choice, categorized by each impediment identified in the 2013 Phase II AI and followed by the steps DSHS has taken to address those impediments.

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

DSHS prohibits the use of HOPWA funds for construction activities. DSHS Project Sponsors cannot use HOPWA funds to acquire, rehabilitate, convert, repair, dispose of, demolish, or construct property. DSHS authorizes the following housing assistance services:

- Tenant-Based Rental Assistance (TBRA);
- Short-Term Rent, Mortgage, and Utility (STRMU);
- Facility-Based Housing Assistance (FBHA), limited to
    - Short-Term Supportive Housing (STSH), and
    - Transitional Supportive Housing (TSH);
- Permanent Housing Placement (PHP)

DSHS and DSHS Project Sponsors do not undertake affordable housing development activities, so they do not face or have occasion to address NIMBY opposition. DSHS has not undertaken activities to address NIMBYism.

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

DSHS disseminates informational emails from the Texas Department of Housing and Community Development (TDHCA) and the Texas Workforce Commission (TWC) to Administrative Agencies (AAs) and Project Sponsors about upcoming fair housing webinars. AAs and Project Sponsors are a mix of public and private non-profit entities. HUD considers HIV a disabling condition, so AAs and Project Sponsors must understand how fair housing laws apply to their work with eligible households and know how to request reasonable accommodations and modifications. DSHS encourages AAs and Project Sponsors to register for and attend these webinars.

DSHS has created and maintains a DSHS HOPWA Program Manual ("the Manual"), which addresses the Fair Housing Act, Affirmatively Furthering Fair Housing, the Americans with Disabilities Act, Affirmative Outreach, and Reasonable Accommodations. The Manual links to

HUD's Office of Fair Housing and Equal Opportunity Website and informational materials, including materials for persons who believe they have experienced housing discrimination.

The DSHS HOPWA Program uses a standardized program agreement that informs participant households of their right to receive services in a non-discriminatory manner without regard to race, color, religion, sex (including gender identity and sexual orientation), national origin, disability, and familial status. The program agreement also informs households of their right to:

1) use Project Sponsor grievance procedures if their rights have been violated, and
2) file a fair housing complaint with HUD.

DSHS requires all AAs and Project Sponsors to have anti-discrimination and grievance protocols.

DSHS requires all Project Sponsors to have Affirmative Outreach policies that ensure all persons who qualify for the assistance, regardless of their race, color, religion, sex (including gender identity and sexual orientation), age, national origin, familial status, or handicap, know of the availability of the HOPWA Program, including facilities and services accessible to persons with disabilities, and maintain evidence of implementation of the policies.

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

HOPWA does not provide homeownership assistance. DSHS has not undertaken activities to address homeownership.

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

Project Sponsors should have a physically accessible facility located near adequate public transit where households may easily apply for assistance. Also, assisted units must meet minimum Housing Quality Standards, which includes an accessibility standard. The Manual outlines requirements and guidance for ensuring access to the program and that assisted units meet all standards.

The Manual describes reasonable accommodations and provides examples of when the Fair Housing Act requires owners of housing facilities to grant exceptions to their policies or allow persons with disabilities to make reasonable access-related modifications to their private living and common-use spaces. DSHS encourages AAs and Project Sponsors to advocate for reasonable accommodations with and on behalf of eligible households when necessary to afford persons with disabilities the equal opportunity to use and enjoy a dwelling. The Manual also provides examples of when Project Sponsors may grant reasonable accommodations to programmatic requirements or guidance found in the Manual.

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

*Tenant-Based Rental Assistance (TBRA) Services – Client-Determined Activity*

DSHS authorizes TBRA services, to which it has historically devoted approximately 55% of its annual operating budget. Project Sponsors coordinate rental assistance payments to owners without the use of vouchers. This design increases the likelihood that voucher-averse owners will work with Project Sponsors and eligible households. A voucher-less service design has expanded the stock of potential tenant-based units by increasing the number of owners who accept ongoing rental assistance payments. In turn, this helps reduce barriers to fair housing choice.

TBRA provides an ongoing and portable rental subsidy that helps households obtain or maintain permanent housing, including assistance for shared housing arrangements, in the private rental housing market until they can enroll in the Housing Choice Voucher Program (HCVP) or other affordable housing programs. Under TBRA, households select a housing unit of their choice. If a household moves out of their unit, they may transfer their assistance to another unit, subject to individual program rules.

HOPWA grantees that authorize rental assistance activities must have rent standards, which set limits for housing costs for each unit size, from efficiencies to six-bedroom units. Rent standards should allow eligible households a reasonable selection of decent, safe, and sanitary units in a range of neighborhoods. As the grantee, DSHS must establish these rent standards, and any Project Sponsor using DSHS HOPWA Program funds to provide rental assistance must adopt them. The DSHS HOPWA Program uses a HUD-approved community-wide exception rent based on documented local housing costs and the housing needs of low-income persons living with HIV (PLWH) in Texas. Project Sponsors use 1) 130% of the Small Area Fair Market Rent (SAFMR) where available, or 2) 130% of the Fair Market Rent (FMR) where there are no SAFMRs. This allows the program to offer participant households a broader choice in private rental housing across a wider market of units and prevents the rental market from pricing clients out of their homes.

In addition to using a community wide exception rent, Project Sponsors use several strategies for helping households secure their chosen unit:

- Rent Standard Increase:
  - On a case-by-case basis, Project Sponsors may increase rent standards by 10% for up to 20% of units that receive rental assistance.
  - This helps eligible households secure their chosen units when they do not initially qualify for rental assistance.
- Negotiating Rent and Utilities:

- o Project Sponsors and eligible households may negotiate reduced rents and alternate utility responsibilities with owners to ensure a household's chosen unit meets rent standard and rent reasonableness requirements.
- o Households responsible for providing their own utilities may secure documentation from friends, family, or local programs pledging full support for those utility costs. This allows Project Sponsors to waive specific utility allowances, reducing gross rent and increasing the chances of a proposed unit meeting rent standard requirements.
- Advocacy for Barriers:
  - o DSHS encourages Project Sponsors to advocate for eligible households with housing barriers.
  - o Barriers include credit, rental, and criminal history and minimum income requirements.
- Shared Housing Arrangements:
  - o DSHS allows shared housing arrangements, where two or more unrelated households voluntarily live together in a unit, subject to program requirements. This expands housing options through roommate scenarios, a potentially cost-effective alternative to individual housing.
  - o Generally, an assisted household cannot be related by blood or marriage to a resident owner. However, Project Sponsors may approve the arrangement if it would provide a reasonable accommodation for a household member with disabilities.
- Permanent Housing Placement:
  - o DSHS authorizes Permanent Housing Placement (PHP) services.
  - o This helps households pay for initial move-in costs for their chosen unit and facilitates relocation when necessary.

*Short-Term Rent, Mortgage, and Utility (STRMU) Services – Client-Determined Activity*

STRMU provides short-term rent, mortgage, and utility payments for households experiencing a financial crisis related to their HIV health condition or a change in their economic circumstances. STRMU helps prevent homelessness by enabling households to remain in their own homes. When combined with other complementary efforts, including health care, case management, benefits counseling, and employment or vocational services, STRMU can stabilize households facing homelessness. STRMU payments alone may only offer temporary stability to an unstable living arrangement. To achieve lasting housing stability, STRMU-assisted households should devise plans that address short- and long-term housing stability goals. Project Sponsors evaluate the ongoing housing needs of STRMU-assisted households, assess their current resources, and link them to other permanent housing options as appropriate.

*Short-Term Supportive Housing (STSH) Services – Both Client- and Non-Client-Determined Activity*

STSH provides temporary shelter for households experiencing homelessness. Services allow households to develop individualized housing plans that address both short- and long-term needs and culminate in permanent housing. Per 24 CFR §574.330(c), Project Sponsors must, to the maximum extent practicable, provide each STSH-assisted household an opportunity for placement in permanent housing or housing appropriate to their assessed needs. Project Sponsors assess each households' housing needs, develop an individualized housing and service plan, and consider using PHP and rental assistance or other affordable housing programs to promote housing stability. STSH pays costs for operating and leasing, including costs for emergency hotel and motel stays.

*Transitional Supportive Housing (TSH) Services – Both Client- and Non-Client-Determined Activity*

TSH provides up to 24 cumulative months of non-portable facility-based rental assistance to households that are homeless or at risk of homelessness, including assistance for shared housing arrangements. Services allow households to prepare for permanent housing and develop individualized housing plans that culminate in permanent housing. TSH affords interim service-enriched residential settings to households until they transition to TBRA services or enroll in HCVP or other affordable housing programs. Unlike TBRA, services link to a specific unit or building. If a household moves out of their unit, they cannot transfer their assistance to another unit. TSH pays costs for project-based rental assistance, master-leasing, and operating.

*PHP Services – Client Determined Activity*

PHP helps households access, secure, and establish a permanent residence, maintained either on their own or with the help of ongoing rental assistance. Project Sponsors can use PHP as a standalone service or in conjunction with other HOPWA or non-HOPWA housing assistance services. PHP services assist with a variety of circumstances, including, but not limited to:

- If a household must locate to a new unit that meets rent standard and rent reasonableness requirements;
- If a surviving household member is fleeing domestic violence, dating violence, sexual assault, or stalking;
- If a household member has reasonable concerns about safety (actual and imminent threats if they remain within the same unit);
- If a household must locate a new unit that meets Habitability Standards when an owner cannot or refuses to bring a proposed unit into compliance; and
- If a household has identified a different unit that would be more accessible or visitable for household members with disabilities.

## General Land Office

GLO's efforts to affirmatively further fair housing and increase fair housing choice is included in Chapter 9 regarding Disaster Recovery.

## Texas Workforce Commission – Civil Rights Division (TWC-CRD or CRD)

TWC-CRD conducts fair housing enforcement and education in the State of Texas. While TWC-CRD does not receive HUD CPD funds or administer HUD CPD programs, their role in fair housing enforcement puts them in a unique position, and they do undertake fair housing activities. TWC-CRD activities have specifically addressed three impediments identified in the 2019 AI:

- Impediment 2: There is a lack of understanding and awareness of fair housing law, rights, and duties available to local governments, stakeholders, and the public about fair housing requirements and programs to assist low-income residents and persons with disabilities.
- Impediment 3: Protected classes may experience obstacles in accessing homeownership and lending products.
- Impediment 5: There are barriers for specific protected classes that may limit mobility and free housing choice.

Following the Covid-19 pandemic, TWC-CRD began an extensive fair housing community outreach campaign to assist with the training and education of Texans. For the past five years approximately 62% of complaints investigated by TWC, involved in some way a reasonable accommodation or modification related to disability. Beginning in FY 2022, a major goal of TWC-CRD, has been to increase our outreach efforts. TWC-CRD thought the best way to accomplish this to establish partnerships with Apartment Associations at the municipality and State level. In previous years, our efforts focused on educating the public. This initiative continues to focus on educating the public with an emphasis on housing providers. Below is a summary of the disability and low-income outreach activities that have been achieved by CRD in FY 2021, 2022, and 2023. TWC-CRD conducted Monthly (12) Fair Housing overview training events each Fiscal Year that educated approximately 1,336, 1,223, and 183 in each year respectively. These training events were conducted monthly through Webinar, computer-based training, or in person. CRD also conducted seventeen Reasonable Accommodations/Modifications in person training and education events. The in-person events were attended by close to 1,000 participants from Apartment Associations across the State. The participants included property managers, leasing agents, local housing authority staff, maintenance workers, and other fair housing stakeholders. The presentation slides and HUD/Department of Justice (DOJ) Memoranda on Reasonable Accommodations, Modifications, and Service Animals were available to all participants for downloading.

**Figure 5-1: Texas Workforce Commission Outreach, Trainings, and Presentations**

| Date | Topic | Location | Attendees |
|---|---|---|---|
| 02/15/2022 | Reasonable Accommodations/ Modifications Training | Dallas Apartment Association | 55 |
| 10/12/2022 | Reasonable Accommodations/ Modifications Training | San Antonio Apartment Association | 65 |
| 10/27/2022 | Reasonable Accommodations/ Modifications Training | Houston Apartment Association | 78 |
| 12/14/2022 | Reasonable Accommodations/ Modifications Training | Houston Apartment Association | 66 |
| 02/15/2023 | Reasonable Accommodations/ Modifications | San Angelo Apartment Association | 90 |
| 02/21/2023 10/21/2016 | Reasonable Accommodations/ Modifications | Dallas Apartment Association | 85 |
| 3/22/2023 | Reasonable Accommodations/ Modifications | Lubbock Apartment Association | 150 |
| 4/20/2023 | Reasonable Accommodations/ Modifications | Greater Dallas Apartment Association | 85 |
| 4/5/2023 | Reasonable Accommodations/ Modifications | Texas Apartment Association Conference & Expo (Fort Worth) | 150 |
| 6/13/2023 | Texas Appraisal Licensing Certification Board/Investigative Process Training | Austin | 15 |
| 9/18/2023 & 9//20/2023 | Reasonable Accommodations/ Modifications Training | Texarkana Apartment Association | 70 |
| 9/19/2023 | Reasonable Accommodations/ Modifications Training | Longview Apartment Association | 80 |
| 9/21/2023 | Reasonable Accommodations/ Modifications Training | Tyler (Piney Wood Apartment Association) | 88 |

| Date | Topic | Location | Attendees |
|---|---|---|---|
| 10/25/2023 | Reasonable Accommodations/ Modifications Training | Lubbock (AA) | 130 |
| 11/14/2023 | Reasonable Accommodations/ Modifications Training (Webinar) | San Antonio (AA) | 40 |
| 12/12/2023 | Reasonable Accommodations/ Modifications Training | Houston (AA) | 100 |
| 12/11/2023 | Texas Realtor Association | Webinar | 250 |

**Figure 5-2: Texas Workforce Commission Reasonable Accommodation Training**



TWC-CRD is currently doing a Social Media Campaign on Facebook, X (formerly Twitter) starting in September and will run through August 2024. The campaign targets the following geographic areas: Dallas-Fort Worth, Gulf Coast, Midland-Odessa, San Antonio, and the Rio Grande Valley. In the future, TWC-CRD Public Service Announcements (PSAs) will be placed on media outlets such as buses, radio, billboards, etc. These PSAs will have a specific targeted audience, dual languages, and locations within the state. Targeted locations include Midland/Odessa and other locations.

TWC-CRD is also responsible for enforcing the Fair Housing Act in Texas, including complaints and cases involving lending discrimination. Figure 5-3 provides a list of the discrimination lending cases closed by TWC-CRD during Fiscal Years 2021 to 2023.

**Figure 5-3: TWC-CRD Lending Cases, FY 2021 through FY, 2023**

| Totals | Fiscal Year | Resolution Type | Number of Lending Cases |
|---|---|---|---|
| | 2021 | Complainant failed to cooperate | 1 |
| | 2021 | Closed for Lack of Jurisdiction | 1 |

| Totals | Fiscal Year | Resolution Type | Number of Lending Cases |
|---|---|---|---|
| | 2021 | No cause determination | 1 |
| | | | |
| FY Total 21 | | | 3 |
| | 2022 | No Cause Determination | 3 |
| | 2022 | Conciliation/Settlement | 1 |
| FY Total 22 | | | 4 |
| | 2023 | Conciliation/settlement successful | 2 |
| | 2023 | No cause determination | 3 |
| FY Total 23 | | | 5 |

# Chapter 6 - Housing Program and Portfolio Analysis

This chapter uses data from the Texas Department of Housing and Community Affairs' (TDHCA) and the Department of State Health Services' (DSHS) programs to analyze and compare demographics of eligible program participants to actual persons served by the program. The analysis is meant to examine market areas where protected classes have limited options in the private market and/or opportunities for TDHCA to improve provision of programs to protected classes. It is important to note that the provision of programs may be limited by HUD regulations and program eligibility criteria. Additionally, the AI contemplates actions that could be taken by the State beyond just the use of CPD funds to fulfill our requirement to affirmatively further fair housing in state programs.

Where possible, the analysis will focus on eligible populations rather than the state at large. If a program is available to households with incomes at or below 50% Area Median Family Income (AMFI), data regarding program participants will be compared to statewide and county figures from HUD's Comprehensive Housing Affordability Strategy (CHAS) data for households at or below 50% AMFI. The income categories used by CHAS are as follows:

- Extremely Low Income (ELI): at or below 30% AMFI;
- Very Low Income (VLI): greater than 30% but less than or equal to 50% AMFI;
- Low Income (LI): greater than 50% but less than or equal to 80% AMFI;
- Moderate Income (MI): greater than 80% but less than or equal to 100% AMFI; and
- Greater than 100% AMFI.

## Single Family HOME and Housing Trust Fund Programs

The purpose of the HOME Investment Partnerships (HOME) Program is to expand the supply of decent, safe, and affordable housing for ELI, VLI, and LI households and to alleviate the problems of excessive rent burdens, barriers to homeownership, and deteriorating housing stock. Five activities are funded through the HOME Program: Contract for Deed (CFD), Homebuyer Assistance with New Construction (HANC), Homeowner Reconstruction Assistance (HRA), Single Family Development (SFD), and Tenant-Based Rental Assistance (TBRA). HOME Program activities provide assistance as follows:

- The Contract for Deed (CFD) initiative funds units of general local governments, public housing authorities, local mental health authorities, and nonprofits wishing to assist colonia residents earning not more than 60% of the Area Median Family Income ("AMFI") with converting contracts for deed into traditional mortgages. Contract for Deed activities involve acquisition or refinance along with one of the following additional activities: (1) reconstruction or new construction of site-built housing; (2)

Replacement of an existing manufactured housing unit (MHU) with a new MHU; and (3) Rehabilitation of colonia housing.

- The Homebuyer assistance with new construction (HANC) program funds units of general local governments, public housing authorities, local mental health authorities, and nonprofits to provide mortgage financing to low-income homebuyers for Acquisition and/or New Construction of site-built housing, or acquisition and/or placement of a new Manufactured Housing Unit (MHU). Funds are provided to the homebuyer as a fixed-rate loan with a term of 15-30 years. Interest may be as low as 0%.

- The Homeowner Reconstruction Assistance (HRA) program funds units of general local governments, public housing authorities, local mental health authorities, and nonprofits wishing to provide the following services under the Homeowner Reconstruction Assistance initiative: (1) Reconstruction of owner-occupied housing on the same site, (2) New construction of site-built housing on the same site to replace an existing owner-occupied manufactured housing unit (MHU), (3) Replacement and relocation of existing housing located in a floodplain to a new MHU or new construction of housing on an alternative site, or (4) New construction or a new MHU to replace a housing unit that has become uninhabitable as a result of disaster or condemnation by local government.

- HOME provides funding to nonprofits certified as a Community Housing Development Organizations (CHDOs) for the new construction or rehabilitation of affordable single family homes to be sold to qualifying lower income households.

- The Tenant-Based Rental Assistance (TBRA) program funds units of general local governments, public housing authorities, local mental health authorities, and nonprofits wishing to provide the following assistance to households in their local communities: (1) Security and utility deposits; and (2) Rental subsidies for up to 24 months while the household engages in a self-sufficiency program. If available, additional funds may be set-aside to provide assistance beyond 24 months for households meeting additional program requirements.

Households receiving assistance through HANC, HRA, SFD, and TBRA must have an income at or below 80% AMFI, while households receiving assistance through CFD must have an income at or below 60% AMFI and must reside in a colonia. TDHCA defines a colonia as:

> *"…a geographic area located in a county some part of which is within 150*
> *miles of the international border of this state, consists of 11 or more dwellings*
> *that are located in close proximity to each other in an area that may be*
> *described as a community or neighborhood, has a majority population*
> *composed of individuals and families with low income and very low income,*
> *based on the federal OMB poverty index and meets the qualifications of an*
> *economically distressed area under Section 17.921, Water Code; or has the*

> *physical and economic characteristics of a colonia, as determined by the department."*

This definition may differ from the definition used by other agencies and organizations. Due to the lack of data regarding households with incomes at or below 60% AMFI, households with incomes at or below 80% AMFI will be used as the eligibility measure for comparison.

Households with one or more of the four severe housing problems, either lack complete kitchen or plumbing facilities, are overcrowded (more than 1 persons per room), or are severely cost burdened (paying more than 50% of their income for housing costs). Households for whom cost burden data could not be computed may be excluded from this analysis. County-level data are only shown for counties with at least 30 participant households for a given HOME Program activity. This is to prevent accidental identification of a household participating in a program, which is possible if enough data are available, even if the data have been de-identified. Additionally, many statistical analysis texts suggest that meaningful estimates of even simple calculations, including averages, tend to be more reliable as the sample size passes 30. As a result, analysis cannot be performed on the CFD program, as there were far fewer than 30 CFD activities across the state in the timeframe analyzed.

All HOME Program participant households that identified as Hispanic or Latino were categorized as Hispanic or Latino, regardless of race. Those who identified as Not Hispanic or Latino were categorized depending on their self-identified race. Note that the same address may have generated more than one program activity and each instance is counted separately.

Because no one county had more than 29 SFD or HANC activities, they are not included in the analysis. Because subrecipients of these funds do not report demographics the same way, the categories of race and ethnicity may be combined or may group different races or ethnicities in ways different from in other programs.

## Reference Group

According to HUD's Comprehensive Affordable Housing Strategy (CHAS) data from 2016 through 2020, of households at 80% or less of the Area Median Family Income (AMI, or AMFI), less than 1% were Hawaiian or Pacific Islander or American Indian or Alaska Native, 3.5% were Asian, 16.3% were Black or African American, 38.4% were White, and 41.3% were Hispanic of any race. CHAS

data treats race and ethnicity together, so White would be the same as "White, not Hispanic or Latino."[25]

## TBRA

TDHCA administers Tenant Based Rental Assistance (TBRA) program utilizing HUD CPD funds. This program helped more than 4,800 households across Texas between 2019 and 2023. From 2019 through 2023, approximately 37.6% of HOME TBRA households were White, non-Hispanic, 33.5% were Hispanic or Latino of any race, 25% were Black. This is roughly proportional to the makeup statewide of households under 80% of AMI, except for Black households, which made up 25% of TBRA households and are 16% of the eligible households in Texas.

***For all figure links cited below, click on that link and navigate to the tab that corresponds to the figure title. Once in Tableau, to highlight a specific region use the Region drop down located on the right hand side of the Tableau mapping window. Check only the box of the Region you would like to view. Please note that you may select multiple Region boxes to compare data across regions.***

**Figure 6-1 -Tenant Based Rental Assistance, Households Served by Race and Ethnicity**

## HRA

TDHCA's HRA program helps to provide reconstruction of existing single family housing, or new construction. 45.9% of all HRA-assisted households were Hispanic of any race, 27.7% were non-Hispanic White, and 25.4% were Black. In this program, households helped were disproportionately Black compared to the eligible statewide population.

**Figure 6-2: Homeowner Reconstruction Assistance, Households Served by Race and Ethnicity**

## Bootstrap Loan Program

The Texas Bootstrap Loan (Bootstrap) Program provides zero-interest loans to eligible applicants that participate in self-help housing programs overseen by state-certified nonprofit owner-builder housing providers. The loan can be up to $45,000 repayable over a period of 30 years, and are usually paired with additional loans or funding sources. Much of these loans are distributed to subrecipients like local Habitat for Humanity organizations. Known as the Owner-Builder Loan Program in Tex. Government Code §2306.751, the Texas Bootstrap Loan Program

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[25] Source: 2016-2020 Comprehensive Housing Strategy Data, Table 1

promotes and enhances homeownership for Texans with an income of less than or equal to 60% AMFI by providing funds to purchase or refinance real property on which to build new residential housing, construct new residential housing, or improve existing residential housing through sweat-equity. Eligible applicants must agree to provide at least 65% of the labor necessary to build or rehabilitate the proposed housing. This program is funded through the Texas Housing Trust Fund (THTF). At least two-thirds of Texas Bootstrap loans each fiscal year must be made to borrowers whose property is in a census tract that has a median household income that is not greater than 75% of the median state household income. Similar to the HRA program, households assisted with Bootstrap Loan funds were disproportionately Hispanic and were less likely to be non-Hispanic White. Unlike other programs, 11.2% of households served in this program were Asian or Pacific Islander. That group and Black households were the most overrepresented in the program.

**Figure 6-3:** <u>**Bootstrap Loan Program, Households Served by Race**</u>

## Amy Young Barrier Removal Program

The Amy Young Barrier Removal (AYBR) Program provides one-time grants of up to $22,500 for Persons with Disabilities who need modifications to increase accessibility and eliminate hazardous conditions in their home. Program beneficiaries must include a Person with Disability, must have a household income that does not exceed 80% of the Area Median Family Income (AMFI), as defined by HUD for the HOME Program, and may be tenants or homeowners.

While this program is available statewide, there are some details to the way the program operates that hinder geographic (and thus, sometimes demographic) dispersion of program resources. The chief among these details is that the program funds local or regional non-profits and requires these non-profits to administer the funds. In many cases, particularly in rural areas, there is a lack of non-profits that have the administrative capacity to administer such a program.

One concern with attempting to draw conclusions about the demographic makeup of the AYBR applicants is that there are several filters that can impact the demographics of applicants. First, is that the household must have a household member who has a disability related need for accessible features, the household must be low-income (make less than 80% of AMI) and there needs to be clear title, which is often difficult for homes that have been passed down over multiple generations. In the AYBR program, 62.2% of awarded households were Hispanic, mostly made up of the 59.2% of all households that identified as White and Hispanic. White non-Hispanic households made up 17.9% of served households, and Black households made up 19.9% of recipients.

**Figure 6-4: <u>Amy Young Barrier Removal Program, Households Served by Race and Ethnicity</u>**

# Homeownership Programs

## Reference Group

According to HUD's Comprehensive Affordable Housing Strategy (CHAS) data from 2016 through 2020, of households at 80% or less of the Area Median Family Income (AMI, or AMFI), less than 1% were Hawaiian or Pacific Islander or American Indian or Alaska Native, 3.5% were Asian, 16.3% were Black or African American, 38.4% were White, and 41.3% were Hispanic of any race. CHAS data treats race and ethnicity together, so White would be the same as "White, not Hispanic or Latino."[26]

## My First Texas Home Program

The My First Texas Home (MFTH) Program offers competitive interest rate mortgage loans and down payment assistance for qualified individuals and families whose gross annual household income does not exceed 115% AMFI or 140% of AMFI if in a targeted area. The MFTH Program is offered on a first-come, first-served basis through a network of participating lenders to households purchasing their first home or those who have not owned a home in the past three years. The purchase price of the home must not exceed stipulated maximum purchase price limits. A minimum of 30% of program funds are made available to assist Texans earning 80% or less of program income limits.

The Texas Mortgage Credit Certificate (TX MCC) Program may be combined with the MFTH Program; however, borrowers under either funding source must continue to meet the more restrictive eligibility requirements of the TX MCC Program.

Statewide, White households are underrepresented and Hispanic or Latino households are overrepresented in MFTH Program participant households. Over 56% of all MFTH households identified as Hispanic, while only 18.7% identified as White, non-Hispanic.

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[26] Source: 2016-2020 Comprehensive Housing Strategy Data, Table 1

**Figure 6-5: My First Texas Home, Households Served by Race and Ethnicity**

## Texas Mortgage Credit Certificate Program

The Texas Mortgage Credit Certificate Program (TX MCC) provides a tax credit of 40% of annual interest paid on a mortgage loan up to $2,000 annually that reduces the borrower's federal income tax liability. Similar to the MFTH Program, the TX MCC Program is offered through a network of participating lenders. The TX MCC Program provides homeownership opportunities for qualified households whose gross annual household income does not exceed 115% AMFI or 140% AMFI if in a targeted area. In order to participate in the TX MCC Program, homebuyers must meet certain eligibility requirements and obtain a mortgage loan through a participating lender.

The TX MCC Program may be combined with the MFTH Program; however, borrowers under either funding source must continue to meet the more restrictive eligibility requirements of the TX MCC Program.

Statewide, out of all MCC program households, 50.2% were Hispanic and 22.7% were White, non Hispanic. All other groups were represented proportionally among MCC households. Following in the same trend, White households were underrepresented and Hispanic households were overrepresented.

**Figure 6-6: Texas Mortgage Credit Certificate, Households Served by Race and Ethnicity**

## My Choice Texas Home

Unlike the My First Texas Home program, the My Choice Texas Home program is not limited to only first time homebuyers and has higher minimum income requirements. The program is available statewide and may include closing cost and down payment assistance. This program does have a minimum credit score requirement of 620 and the applicant must be approved for a mortgage with one of the Texas Homebuyer Program approved lenders.

Households participating in this program look demographically similar to households in the MCC and MFTH programs. Approximately 52.7% of households were Hispanic, 20.4% were White and not Hispanic or Latino, and 15.6% were Black. As with other TDHCA homebuyer programs, Hispanic households are overrepresented while White households were underrepresented. All other groups were proportionally distributed when compared to the eligible population.

**Figure 6-7: My Choice Texas Home, Households Served by Race and Ethnicity**

# Multifamily Programs

TDHCA's Multifamily Finance Division funds the construction of affordable rental housing through the Housing Tax Credit (HTC) Program, Multifamily Bond (MF Bond) Program, and Multifamily Direct Loan (MFDL) Program.

The HTC Program provides tax credits to nonprofit or for-profit developers which are in turn sold in order to generate equity and allow property owners to lease units at reduced rents. The targeted beneficiaries of the program are households with incomes at or below 80% AMFI (60% at the time of the data collection). There are two different HTC programs: the 9% competitive HTC Program and the 4% non-competitive HTC Program.

Through the MF Bond Program, TDHCA issues tax-exempt and taxable multifamily bonds to provide loans for the development of affordable rental housing to nonprofit and for-profit developers who assist Texans with incomes at or below 60% AMFI.

Through the MFDL Program, TDHCA awards HOME, Tax Credit Assistance Program Repayment Funds (TCAP RF), Neighborhood Stabilization Program Round 1 Program Income (NSP1 PI) as available, and National Housing Trust Fund (NHTF) funds to eligible applicants for the development of affordable rental housing. Owners are required to make the units available to households at or below 80% AMFI and must meet long-term rent restrictions as defined by HUD.

The Multifamily Finance Division programs are frequently layered or have received funding at different points in time (for example a property may have a tax credit allocation from 2006 and a direct loan from 2009). Due to this layering, where possible Multifamily Finance Division programs will be combined and analysis will be based on all active multifamily properties still participating in TDHCA Multifamily Finance Division programs, which we consider the multifamily portfolio. Over time, other Department programs and fund sources have been used to finance multifamily properties, which are also part of the Department's multifamily portfolio and this analysis.

## Reference Group

Properties in TDHCA's multifamily portfolio report race and ethnicity separately for each individual in a resident household. Because data are recorded for each individual, this portfolio data will be compared to the U.S. Census Bureau's American Community Survey (ACS) data, which provide data at the individual level, as opposed to HUD's CHAS data. ACS data separate race and ethnicity, so multifamily portfolio resident data will be listed by race and by ethnicity separately. Note that race and ethnicity data are self-reported.

According to the 2021 5-Year ACS, Texans that were below the poverty level were 23.3% White non-Hispanic, 16.7% Black, 1.0% American Indian/Alaska Native, 3.6% Asian, 0.2% Native Hawaiian/Other Pacific Islander, 14.3% Some Other Race, 29.3% Two or More Races.[27] Additionally, Texas is 53.9% Hispanic of any race. Additionally, 11.4% of Texans have a disability as defined by the ACS while 16.3% of Texans below the poverty line have a disability[28]

While the ACS does not include a table that looks at race of Texans under 200% of poverty, the Current Population Survey does track the percent of persons below 200% of poverty. In Texas, 27.5% of individuals were living below 200% of the poverty line, as did 38.5% of Black or African American individuals, 21.6% of White non-Hispanic individuals, and 40.6% of Hispanic individuals. Individuals living in multifamily properties have the option to indicate their race and ethnicity on in-take forms; this information is not required.

## Section 811 Project Rental Assistance

The Section 811 Project Rental Assistance (PRA) program provides project-based rental assistance for extremely low-income persons with disabilities linked with long-term services. The program is made possible through a partnership between TDHCA, the Texas Health and Human Services Commission (HHSC), and eligible multifamily properties. The Section 811 PRA program creates the opportunity for persons with disabilities to live as independently as possible through the coordination of voluntary services and providing a choice of subsidized, integrated rental housing options.

The program is limited to individuals who are part of the Target Population and receiving services through one of the HHSC Agencies participating in the program. Each eligible household must have a qualified member of the Target Population that will be at least 18 years of age and under the age of 62 at the time of admission. All three Target Populations are eligible for community-based, long-term care services as provided through Medicaid waivers, Medicaid state plan options, or state funded services and have been referred to TDHCA through their service provider or coordinator. The State of Texas has committed to making these voluntary services available based on the needs of individual members of each Target Population. Individuals must be referred to the program by a Qualified Referral Agent. The program is only available in a handful of metropolitan areas of the state.

The targeted populations for the program are:

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[27] Source: 2021 5 Year ACS, Table S1701 and DP05
[28] Source: 2021 5 Year ACS, Table S1703

- People with disabilities living in institutions. People that wish to transition to the community from nursing facilities and intermediate care facilities for persons with intellectual and developmental disabilities may not have access to affordable housing in their community.
- People with serious mental illness. Individuals engaged in services but facing challenges due to housing instability. Stable, integrated, affordable housing would enable these individuals to have the opportunity to fully engage in rehabilitation and treatment, greatly improving their prospects for realizing their full potential in the community.
- Youth with disabilities exiting foster care. Youth exiting foster care often become homeless, particularly without the stability of long-term housing and comprehensive support services.

**Figure 6-8:** **Section 811 Project Rental Assistance, Total Applicants and Households Served by Race**

There have been just over 3,000 applicants to the Section 811 program. Of those, 33.5% were Black or African American, while 47.9% of applicants identified as White. Thirty-two percent of applicants identified as Hispanic or Latino of any race. Compared to the households that were housed, 23.8% were Hispanic of any race, 36.6% were White, and 44.6% were Black or African American. It is difficult to ascertain anything from these data for several reasons. First, the target populations differ both from each other and from the reference group cited above of income-qualified households. At most, there appears to be an overrepresentation of Black or African American applicants. Second, the nature of the program (particularly the portion where the individual applicant needs to be referred) means that there is an additional consideration that could influence the applicant demographics.

## Racial and Ethnic Comparison in TDHCA-Monitored Multifamily Properties

Compared to the state population below poverty, households in TDHCA-monitored multifamily properties as of 2023 were 12.5% White non-Hispanic, 31.0% Black or African American, 0.3% American Indian or Alaska Native, 1.2% Asian, 0.2% Native Hawaiian or Pacific Islander, 5.2% Some Other Race, and 37.1% Hispanic of any race. Despite making up 11.8% of all Texans, Black or African American Texans make up 16.7% of Texans below poverty, and make up 31% of residents in TDHCA-monitored properties.[29] Compared to the population below 200% of poverty, the population of TDHCA properties is fairly representative. This lends some additional evidence to indicate that 200% of poverty is a good proxy for 80% of AMI.

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[29] Source: TDHCA Central Database, pulled Q4 2023

**Figure 6-9:** <u>Tenants in TDHCA-Monitored Units, by Race</u>

## Disability Comparison

Tenants in TDHCA monitored properties have the option of identifying themselves as having a disability. Just over 90% of tenants chose to answer this question and identify whether they had a disability or not. In TDHCA monitored properties, out of those choosing to answer, 10.8% answered that they had a disability. This is below the statewide average of 11.4% and even further below the 16.3% of those living at or below the poverty line. However, direct comparisons of these data points is not advisable, as the Census Bureau's definition of disability must be functionally the same as the definition used by other federal agencies, and is derived from a questionnaire meant to ascertain whether a person has a disability, but this definition is not the same as the one contemplated in the Fair Housing Act (FHA) or the Americans with Disabilities Act (ADA). The Census Bureau uses six sub-questions:

1.a Is this person deaf or does he/she have serious difficulty hearing?

1.b Is this person blind or does he/she have serious difficulty seeing even when wearing glasses?

2.a Because of a physical, mental, or emotional condition, does this person have serious difficulty concentration, remembering, or making decisions?

2.b Does this person have serious difficulty walking or climbing stairs?

2.c Does this person have difficulty dressing or bathing?

3. Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor's office or shopping?

The FHA and ADA defines a disability as any physical or mental impairment that substantially limits one or more major life activities. These major life activities include (but are not limited to) speaking, breathing, hearing, seeing, caring for oneself, bathing, sleeping, etc. Again, that list is not exhaustive. Because of these different definitions, estimates on the percent of the population with a disability will vary. Pew Research Center in July of 2023 estimated that 13% of civilian noninstitutionalized Americans have a disability, while the Centers for Disease Control estimates that 27% of adults have some type of disability, and further estimate that fully 12.8% of American adults have a cognitive disability, which is nearly the same as Pew Research estimated had any disability. Residents in TDHCA-monitored properties are not using any standardized definition of disability when providing their responses, making it even more difficult to draw any inferences from these data.

## LIHTC Income Categories

In the LIHTC Program, properties are required to identify at application the number of units that they will make available for different income categories of tenants; the incomes of the households who occupy those units must be at or below the income category selected. For example, a unit identified by a property to be a 60% AMFI unit must be occupied by someone with an income no greater than the 60% AMFI limit, but may actually be occupied by a household with an income closer to 30% AMFI.

**Figure 6-10: LIHTC Units and Texas Renters, by AMI Tier**

Statewide, there are proportionally more LIHTC Program-assisted units set aside for LI households than any other income category. While 21.5% of Texas renter households have incomes in this category, 77.9% of HTC Program-assisted units are set aside for households in that the same income category. This does not mean that there are more LIHTC LI units than there are LI renter households in Texas. Previously, because there were no LIHTC Program-assisted units set aside for households with incomes above 60% AMFI, this overrepresentation was limited to units set aside for households with incomes between 50% and 60% AMFI. Since the 2019 AI, Internal Revenue Service (IRS) rules have begun allowing an "income averaging" approach, which allows some units to house households up to 80% of AMI. This process is new and not many properties have elected to begin this approach. In active TDHCA-monitored LIHTC properties in Texas, only 1.4% of units are set aside for 80% AMI or less. It should be noted that income categories listed for HTC Program-assisted units are maximum incomes, and it is not uncommon for households that would qualify as ELI, VLI, or LI to occupy a unit at a level higher than the income category for which they would be classified. For instance, a VLI household may occupy a unit set aside for LI households, which may result in these households having a greater housing cost burden than would be expected if they were able to be housed in an appropriately classified unit. The impact that income averaging will have on this phenomenon is currently unknown. However, households in LIHTC units that are set aside at 80% will need to have enough units set aside below 60% in order for the property to remain compliant with TDHCA and IRS rules.

While 21.5% of Texas renter households are ELI, only 4.2% of HTC Program-assisted units are set aside for households within this AMFI category. This percentage represents an increase over 2019's number, which was 2.9%. The percent of Texas renter households that are VLI is relatively close to the percent of HTC Program-assisted units set aside for households in this AMFI category (17.1% of renter households compared to 17.9% of HTC Program-assisted units).

There are a limited number of ELI units available because of the long-term operating costs associated with operating these units. Based on operating costs from all parts of the state of Texas, the average annual operating expense before debt service for a multifamily development

on a per unit basis is higher than the maximum gross rent able to be charged for a unit set aside for households with an income less than or equal to 30% AMFI. Therefore, even if the unit was built with 100% grant funds (i.e., no debt), housing an ELI household requires an ongoing source of subsidy. When a property uses profits generated from units that are set aside for households with higher incomes or market rate units to subsidize those lower income units, the net income capacity of the whole development is challenged, which can affect their ability to obtain debt and thereby lead to insufficient funds to develop, acquire, or build the development. Even where public housing is converted to tax credit housing, for example, and sufficient non-repayable funds are available to build or acquire the housing (i.e., no outstanding debt to complete the project), ELI restricted rent units must still be offset with higher rent level units to ensure the property can break even. Alternatively, ongoing rental subsidy can be used to pay the higher rents and sustain the ongoing operation of a property.

## LIHTC Units by Property Type

Program units are units within multifamily properties participating in TDHCA programs that are set at a certain level of affordability as a requirement for program participation. Property type outlines any restrictions or preferences associated with multifamily properties participating in TDHCA programs. For ease of analysis, the elderly category includes the Elderly Only, Elderly Preference, and Elderly Limitation property types. The Individual/Family (also known as General) category includes Individual/Family properties and Intergenerational. The Disability category includes Disability Only. The Supportive Housing category includes Transitional Only, and Supportive Housing property types. Note that the Disability Only properties were approved at a time when properties serving only persons with disabilities was permitted, which is no longer the case.

As of Q1 2024, 77.9% of LIHTC units were Individual/Family while 21.2% were Elderly. Additionally, 0.02% of units were still designated as disability only. These units are slowly dropping out of TDHCA's monitoring process and out of their affordability periods based on expected attrition. This is a natural process in the LIHTC program, as awards generally have contractually-obligated affordability periods that are usually between 20 and 40 years, with most having 30 year affordability periods specified in their Land Use Restriction Agreement (LURA). "Disability only" units were only allowed in very early iterations of the LIHTC program in Texas, so these units have been reaching the end of their affordability periods, and thereafter are no longer monitored by TDHCA. Finally, 0.8% of units were Supportive or Transitional housing. Note that general population properties have no age restrictions of tenants; elderly persons are able to live at these properties. Elderly properties have age restrictions that may prevent some families with children, a protected class, from living at the property. This is an exemption to the FHA allowed under the Housing for Older Persons Act (HOPA).

## Accessibility and Tenant Special Needs

All LIHTC awarded properties are required to set aside, at a minimum, 5% of units and no less than one unit that have mobility accessibility features already in place as well as an additional 2% of units and no less than one unit set aside for sensory (auditory and visual) accessibility features. These percentages have fluctuated in the past and they are set annually in the Qualified Allocation Plan (QAP). Currently, 7.2% of LIHTC units have mobility accessibility features. 10.8% of tenants in TDHCA monitored properties report having a disability, and that number increases in Senior/Elderly properties. In actively monitored properties with Elderly preferences or limitations, at least 8.3% of units had mobility accessibility features and at least 2.2% had auditory or visual accessibility features. It is important to note that above and beyond the minimum 5% and 2%, some units may have both features. This amount compares with 6.0% of Individual/Family units (general occupancy, no age restrictions) with mobility features and 1.7% of units with auditory or visual accessibility features. Though the percent of units with audio or visual features is below 2%, it is worth mentioning that the 5% and 2% minimums have not always been required, so some older properties may not need to comply with these minimums. Percentages are based on averages across the enter portfolio, not just properties that have come online since the minimum set asides were in effect.

It is important to note that the 7.2% of LIHTC units that have mobility accessibility features is only inclusive of units that were designed at construction to be accessible to persons with mobility impairments. This does not include units that received accessible features post-construction due to reasonable accommodation requests, so the number of units with accessible features is likely slightly higher. Regardless, there is still a sizeable gap in the number of accessible units and the number of households that have a person with a disability.

## Multifamily Programs Beyond LIHTC

The number of multifamily units produced by TDHCA programs is predominantly driven by the LIHTC Program. Of the approximately 334,000 actively monitored program units in Texas, 280,000 of them are LIHTC Program units. The remaining 54,000 units were funded through several other programs such as the HOME Investments Partnership Program (HOME), Neighborhood Stabilization Program, Multifamily Bonds, State Housing Trust Fund, Tax Credit Assistance Program (TCAP), and Tax Credit Assistance Program Repayment Funds (TCAP-RF).

**Figure 6-11: All TDHCA-Monitored Multifamily Units, by AMI Tier**

Compared to LIHTC Program units, these 54,000 units are similarly distributed across HUD's AMI groupings, though the non-LIHTC Programs did produce a slightly greater proportion of ELI units (6.1%) compared to LIHTC units (4.5%). It is important to note that there may be some units that have multiple funding sources, including LIHTC. As a result, a small number of LIHTC units

analyzed and non-LIHTC units analyzed may have both LIHTC and non-LIHTC funding sources. This number is too small to impact the preceding analysis in any meaningful way.

## Analysis of 9% LIHTC Application Locations

Prior to writing this AI, TDHCA staff consulted with system stakeholders. Early consultation commentary concerned 9% LIHTC awards, especially in Dallas, Fort Worth, Houston, and Austin, claiming that the current property inventory of 9% LIHTC awardees are disproportionately in census tracts that have below average median incomes and high concentrations of minority populations. In response to this commentary, TDHCA staff analyzed the last 5 years of 9% LIHTC applications (2018-2022), and compared the census tract poverty rates with the percent of the tract that was White non-Hispanic.

**TDHCA did not analyze awards further back than 2018, as the Department cannot fundamentally alter where LIHTC units have been situated in the past.** The results of the analysis show that statewide there is a small difference in White non-Hispanic percentages between census tracts where applications are filed for LIHTC awards and census tracts where no applications were submitted. Census tracts where LIHTC applications were submitted were, on average, 38.0% White, non-Hispanic while tracts without applications were 41.8% White, non-Hispanic. The findings were similar for poverty rates, with tracts without applications having an average population in poverty of 15.0% while tracts with applications have an average population in poverty of 16.6%. Drilling down even more into this data, the poverty rate for Black individuals and Hispanic individuals has a slightly larger gap as well.

**Figure 6-12:** Analysis of 9% LIHTC Applications, 2018-2022 Applications

The analysis was also completed for a handful of the large counties in Texas, covering all of the 5 largest cities in the state. Based on this analysis, the statewide pattern holds for most of the counties examined, with a couple of notable exceptions. Dallas County is unique in that the mean poverty rate is lower in tracts or zip codes with LIHTC applications compared to tracts without an application. The tracts with applications in Dallas County also have a slightly higher percent of population that is White, non-Hispanic. Conversely, Tarrant and Collin County have a significantly higher poverty rate in tracts with applications and are significantly less White, non-Hispanic. **This analysis both bolsters and adds nuance to the analysis performed as part of the early consultation input received.** It should be noted that the comment received as part of the consultation focused on all units over time, while the TDHCA analysis focused on more recent years specifically to reflect the progress the Department has made in the siting of its properties.

**Figure 6-13:** Poverty and Race in Counties, by presence of 9% LIHTC Application 2018-2022

The comment received during the consultation also recommended looking at the Center for Disease Control's Environmental Justice Index (EJI), specifically: Proportion of tract area within 1

mile buffer of an EPA National Priority Site, the proportion of tract area within a 1 mile buffer of a Toxic Release Inventory site, proportion within 1 mile of an EPA treatment, storage, and disposal facility, and the proportion within the 1 mile buffer of an EPA risk management plan site.[30]

It is important to note that there are some caveats to the analysis of LIHTC applications. First, there was only one application over the five year period where it was accompanied by a letter of opposition from the Texas State Representative for that district. There is a strong self-selection bias to application data, as the threat of a letter of opposition may be enough to dissuade a would-be applicant from submitting an application. Unfortunately, because it is impossible to know where applications would be sited if opposition letters were not impactful, it is difficult to ascertain whether the QAP scoring apparatus itself, other than its deference to community support or opposition, is driving any of the disparities highlighted by the analysis of applications. Without a more robust study with stronger controls and data collection mechanisms, it is also not possible to clearly determine if representative letters or the threat of opposition letters were sufficient to prevent an applicant from submitting an application for the 9% LIHTC program.

It is worth noting here that analyzing TDHCA's full multifamily portfolio does not allow for nuanced discussion about the different mechanisms used to award funding for affordable multifamily housing. To explain, TDHCA staff applied some of the analysis done to the 9% LIHTC applications to 4% and Multifamily Bond applications. These awards are not always competitive, whereas the 9% LIHTC program is, and uses a scoring rubric that is established in both Texas statute and in Texas Administrative Code. The gap in poverty rates between tracts that have and tracts that do not have applications is higher in the 4% non-competitive program than compared to the 9% competitive program. **Therefore, the competitive 9% process does seem to drive applications to higher opportunity census tracts.**

## Community Affairs

From 2019 through 2023, the Community Affairs section of TDHCA served nearly 860,000 households across five main programs: Comprehensive Energy Assistance Program (CEAP), Community Services Block Grant (CSBG), Low-Income Household Water Assistance Programs (LIHWAP), Weatherization Assistance Program (WAP) and Low-Income Energy Assistance Programs (LIHEAP). Together all of these programs distributed over $1 billion in assistance to

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[30] The Environmental Justice Index technical documentation states that the EJI should not be used as a definitive tool for labeling Environmental Justice Communities, to represent risk or exposure for a community or to tell if individuals are at risk in that community. TDHCA does not believe that the EJI should be used as a tool to evaluate applications for Low Income Housing Tax Credits (LIHTC).

Texas households to help them with utilities and to weatherize their homes. TDHCA weatherization efforts in 2021 alone reached 22,799 hard to reach households and helped reduce grid demand by more than 26 gigawatt hours per year with an estimated cost savings to low income Texans of $3.4 million dollars per year.[31]

**Figure 6-14: TDHCA Community Affairs Program Overview**
**Figure 6-15: TDHCA Community Affairs Total Dollars Spent, by County**
**Figure 6-16: TDHCA Community Affairs Households Served, by County**

## CEAP

CEAP is a utility assistance program designed to assist low income households in meeting their immediate energy needs and to encourage consumers to control energy costs for years to come through energy education. From 2019 through 2023, CEAP has assisted nearly 600,000 Texans. Approximately 34% of those households were Black while 56% where White. Around 44% of households were Hispanic.

## CSBG

CSBG provides funds to Community Action Agencies, nonprofit organizations and units of general government to alleviate the causes and conditions of poverty in communities. CSBG is funded by the U.S Department of Health and Human Services (USHHS). TDHCA provides 90% of its CSBG funds to Community Action Agencies while 5% of CSBG funds are awarded on a competitive basis for a variety of programs that fight poverty and provide disaster relief. Approximately 60% of households assisted through the CSBG program were Hispanic while 19% were Black. 76% of households served identified as White.

## WAP and LIHEAP

WAP is operated with funds from the U.S. Department of Energy (DOE), and the U.S. Department of Health and Human Services Low Income Home Energy Assistance Program (LIHEAP). WAP is designed to help low income customers control their energy costs through installation of weatherization materials and education. Similar to the CSBG program and CEAP program, 60% of households served were White, 27% where Black, and 47% were Hispanic.

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[31] Weatherization in the State of Texas: A Report to Meet the Requirements of Rider 14 of H.B.1, 87th Legislature

## LIHWAP

The Low-Income Household Water Assistance Program (LIHWAP) is a water assistance program designed to assist low-income households in meeting their immediate water and wastewater needs. The LIHWAP is administered through subrecipients, which collectively cover all 254 counties of the state. LIHWAP households were similar to households served by other CA programs: 51% were Hispanic, 37% Black, and 52% White.

# Housing Opportunities for Persons with AIDS (HOPWA)

The Texas Department of State Health Services (DSHS) administers the State of Texas HOPWA formula grant from HUD. HOPWA serves as the only federal program dedicated to addressing the housing needs of low-income persons living with HIV (PLWH) and their households.

This section compares the percent of 2022 HOPWA program participants (Figure 6-17) to the percent of 2019 PLWH in Texas (Figure 6-18) by race and ethnicity. This comparison uses 2022 Texas HOPWA Program Progress Report data on the race and ethnicity of program participants and 2019 Texas HIV Epidemiologic Profile (epi) data on the race and ethnicity of PLWH in Texas since the 2022 epi data is not yet available. Program Progress Report race and ethnicity data comes from Project Sponsors, the local HOPWA service providers. For reporting purposes, this analysis combines race and ethnicity in Figure 6-17 and Figure 6-18 to align with epi profile categories. Program participants who identified as Hispanic or Latino count only as Hispanic or Latino in the epi profile, regardless of other available racial data. Figures 6-17 and 6-18 include only DSHS HIV Service Delivery Areas (HSDAs) with more than 30 program participants. See Figure 6-19 for a list of the counties included in each HSDA.

Note that program participant percentages may differ from demographics for PLWH, but they only represent relatively small numbers. Percentages in the following tables may not add to 100 percent due to rounding.

**Figure 6-17: Percent of 2022 HOPWA Participants by Race/Ethnicity in DSHS HIV Service Delivery Areas**

| HIV Service Delivery Area | Total Participants | American Indian/ Alaskan Native | Asian | Black | Hispanic | Multiracial | Native Hawaiian/ | White |
|---|---|---|---|---|---|---|---|---|
| Amarillo | 60 | 0% | 2% | 45% | 18% | 13% | 0% | 22% |
| Austin | 63 | 0% | 0% | 44% | 32% | 2% | 0% | 22% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Brownsville-Harlingen** | 273 | 0% | 0% | 2% | 92% | 0% | 0% | 6% |
| **Bryan-College Station** | 37 | 0% | 0% | 70% | 14% | 0% | 0% | 16% |
| **Corpus Christi** | 79 | 0% | 0% | 10% | 70% | 0% | 0% | 20% |
| **Dallas** | 56 | 0% | 0% | 79% | 7% | 13% | 0% | 2% |
| **El Paso** | 37 | 3% | 0% | 0% | 70% | 3% | 0% | 24% |
| **Fort Worth** | 91 | 0% | 0% | 74% | 13% | 0% | 0% | 13% |
| **Houston** | 85 | 0% | 0% | 68% | 15% | 1% | 0% | 15% |
| **Laredo** | 47 | 0% | 0% | 0% | 98% | 0% | 0% | 2% |
| **Lubbock** | 32 | 0% | 0% | 56% | 16% | 0% | 0% | 28% |
| **Nacogdoches-Lufkin** | 69 | 0% | 0% | 54% | 14% | 0% | 0% | 32% |
| **San Antonio** | 124 | 0% | 0% | 27% | 56% | 8% | 0% | 8% |
| **Sherman-Denison** | 64 | 0% | 0% | 33% | 2% | 2% | 0% | 64% |
| **Texarkana-Paris** | 48 | 8% | 0% | 54% | 2% | 15% | 0% | 21% |
| **Tyler-Longview** | 229 | 0% | 0% | 55% | 9% | 4% | 0% | 32% |
| **Uvalde** | 30 | 0% | 0% | 3% | 97% | 0% | 0% | 0% |
| **Total** | 1,424 | 0% | 0% | 37% | 41% | 3% | 0% | 19% |

Source: 2022 Texas HOPWA Program Progress Report data for the Department of State Health Services (DSHS) (From DSHS's Project Sponsors). Percentages may not add to 100% due to rounding.

**Figure 6-18: Percent of 2019 Persons Living with HIV by Race/Ethnicity in DSHS HOPWA Service Areas**

| HIV Service Delivery Area | Total PLWH | American Indian/ Alaskan Native | Asian | Black | Hispanic | Multiracial | Native Hawaiian/ Pacific Islander | White |
|---|---|---|---|---|---|---|---|---|
| **Amarillo** | 558 | 0% | 3% | 14% | 36% | 4% | 0% | 42% |
| **Austin** | 6,846 | 0% | 1% | 22% | 35% | 4% | 0% | 39% |
| **Brownsville-Harlingen** | 2,380 | 0% | 0% | 1% | 94% | 1% | 0% | 5% |
| **Bryan-College Station** | 622 | 0% | 1% | 48% | 21% | 4% | 0% | 26% |
| **Corpus Christi** | 911 | 0% | 0% | 6% | 64% | 5% | 0% | 24% |
| **Dallas** | 24,040 | 0% | 1% | 42% | 24% | 5% | 0% | 27% |
| **El Paso** | 2,383 | 0% | 0% | 4% | 88% | 1% | 0% | 6% |
| **Fort Worth** | 6,767 | 0% | 1% | 41% | 24% | 4% | 0% | 29% |
| **Houston** | 30,485 | 0% | 1% | 48% | 30% | 4% | 0% | 17% |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Laredo | 536 | 0% | 0% | 1% | 97% | 0% | 0% | 2% |
| Lubbock | 687 | 0% | 0% | 15% | 43% | 5% | 0% | 37% |
| Nacogdoches-Lufkin | 732 | 0% | 0% | 44% | 13% | 7% | 0% | 36% |
| San Antonio | 7,510 | 0% | 1% | 15% | 61% | 4% | 0% | 20% |
| Sherman-Denison | 275 | 0% | 0% | 16% | 16% | 6% | 0% | 63% |
| Texarkana-Paris | 457 | 0% | 0% | 41% | 10% | 10% | 0% | 39% |
| Tyler-Longview | 1,775 | 0% | 0% | 43% | 13% | 5% | 0% | 39% |
| Uvalde | 176 | 0% | 0% | 0% | 92% | 0% | 0% | 8% |
| Total | 87,140 | 0% | 1% | 37% | 35% | 4% | 0% | 23% |

Source: 2019 Texas HIV Epidemiologic Profile data from the Department of State Health Services (DSHS). Percentages may not add to 100% due to rounding.

Comparing the racial and ethnic percentages and expected counts of program participants to the respective percentages and expected counts of PLWH in Texas reveals some patterns of under and overrepresentation. This analysis deems a 20% difference between the two percentages as major.

The HSDAs with underrepresentation among White program participants compared to White PLWH include Amarillo and Dallas. However, if evaluated in ratios, 22% to 42% and 2% to 27% amounts to a smaller portfolio ratio than some of the ratios in other service areas. This analysis found no overrepresentation of White program participants in any HSDAs.

The HSDAs with the largest overrepresentation among Black program participants compared to Black PLWH include Lubbock, Dallas, and Fort Worth. This analysis found no underrepresentation of Black program participants in any HSDAs.

This analysis found no significant under- or overrepresentation of program participants that identify as American Indian/Alaskan Native, Asian, Multiracial, or Native Hawaiian/Pacific Islander.

The Lubbock HSDA has underrepresentation among Hispanic or Latino program participants compared to Hispanic or Latino PLWH. However, the Lubbock HSDA only had 32 program participants. Note that most HSDAs do not have many program participants; even 10 to 15 additional program participants in any race or ethnicity category would have significantly changed the percentages. Figure 6-19 lists the counties found in each of the HSDAs analyzed in this section.

Figure 6-19: Counties Included in DSHS HIV Service Delivery Areas That are Included in the Analysis

| HIV Service Delivery Area | Counties |
|---|---|
| Amarillo | Armstrong, Briscoe, Carson, Castro, Childress, Collingsworth, Dallam, Deaf Smith, Donley, Gray, Hall, Hansford, Hartley, Hemphill, Hutchinson, Lipscomb, Moore, Ochiltree, Oldham, Parmer, Potter, Randall, Roberts, Sherman, Swisher, Wheeler |
| Austin | Bastrop, Blanco, Burnet, Caldwell, Fayette, Hays, Lee, Llano, Travis, Williamson |
| Brownsville-Harlingen | Cameron, Hidalgo, Willacy |
| Bryan-College Station | Brazos, Burleson, Grimes, Leon, Madison, Robertson, Washington |
| Corpus Christi | Aransas, Bee, Brooks, Duval, Jim Wells, Kenedy, Kleberg, Live Oak, McMullen, Nueces, Refugio, San Patricio |
| Dallas | Collin, Dallas, Denton, Ellis, Hunt, Kaufman, Navarro, Rockwall |
| El Paso | Brewster, Culberson, El Paso, Hudspeth, Jeff Davis, Presidio |
| Fort Worth | Erath, Hood, Johnson, Palo Pinto, Parker, Somervell, Tarrant, Wise |
| Houston | Austin, Chambers, Colorado, Fort Bend, Harris, Liberty, Montgomery, Walker, Waller, Wharton |
| Laredo | Jim Hogg, Starr, Webb, Zapata |
| Lubbock | Bailey, Cochran, Crosby, Dickens, Floyd, Garza, Hale, Hockley, King, Lamb, Lubbock, Lynn, Motley, Terry, Yoakum |
| Nacogdoches-Lufkin | Angelina, Houston, Jasper, Nacogdoches, Newton, Polk, Sabine, San Augustine, San Jacinto, Shelby, Trinity, Tyler |
| San Antonio | Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, Medina, Wilson |
| Sherman-Denison | Cooke, Fannin, Grayson |
| Texarkana-Paris | Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River, Titus |
| Tyler-Longview | Anderson, Camp, Cherokee, Gregg, Harrison, Henderson, Marion, Panola, Rains, Rusk, Smith, Upshur, Van Zandt, Wood |
| Uvalde | Dimmit, Edwards, Kinney, La Salle, Maverick, Real, Uvalde, Val Verde, Zavala |

# Chapter 7 - Pandemic Response and Other Initiatives

## Introduction

The Covid-19 pandemic in 2020 and 2021 was an unparalleled disruptor of American life in the history of this country. On February 1, 2020, the unemployment rate in Texas was 3.6%, close to the lowest it had been in the last 20 years. By April 1 of the same year, it had nearly quadrupled to 12.8%, the highest level in the last 50 years. This jump happened in mere months, over which period the way that Texans lived their day-to-day lives was upended. Even though the unemployment rate had returned to levels at or below 5%[32] by October 2021, the preceding year and a half left an indelible mark on how Texas and the rest of the world operated.

Some groups of Texans were impacted more by the pandemic than others. Service industry workers nationwide experienced a 23% unemployment rate at the peak in April 2020, while those same workers in Texas saw nearly 20% of all of the food service industry jobs disappear in just a two-month window. Historically, households making less than 67% of the median household income were much more likely to become unemployed and to be impacted by major labor market hiccups. In 2010, when the average monthly unemployment rate hovered just above 8%,[33] the annual average unemployment rate for that year for households making less than 67% of the median household income was 21%,[34] 2.5 times the overall rate. The same pattern held in 1983, where the average annual unemployment rate in Texas was just above 8%, and the annual unemployment rate among those making less than 67% of the median household income was 23%. At the peak of pandemic unemployment, Black Texans experienced an unemployment rate of 16.9%, 4.1 percentage points higher, or nearly one third higher than the overall Texas unemployment rate.[35]

The expected outcome of spikes in unemployment rates is spikes in eviction rates and foreclosure rates as households face difficulties in paying rent or mortgages once unemployed. Foreclosure

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[32] An unemployment rate of under 5% is generally considered to be "normal" or "natural." See Federal Reserve Bank of San Francisco "What is the New Normal Unemployment Rate?" 2/14/2011 https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=872e0f2eaa0c09ea72cd93919544650fcd0fbbc6

[33] St. Louis Federal Reserve FRED Economic Data https://fred.stlouisfed.org/series/TXUR

[34] Unemployment rate in the United States from 1971 to 2015, by income tier. Statista https://www.statista.com/statistics/500348/us-unemployment-rate-by-income-tier/

[35] St. Louis Federal Reserve FRED Economic Data https://fred.stlouisfed.org/series/TXUR

data that breaks down rates by demographic groups is hard to come by and much of it does not cover the years of the pandemic. The best data for this is from the National Bureau of Economic Research. During the 2008 subprime mortgage crisis, the best analog for a large economic shock similar to the pandemic, the foreclosure rate increased much more for Black and Hispanic households than it did for White households.[36]

The Eviction Lab publishes eviction data for many U.S. cities. Eviction Lab data for Houston show that from March 2020 until December 2021, the peak of the pandemic, evictions were filed at rates well below the pre-Covid average. This can largely attributed to the Federal and State moratoria on evictions that were in place in 2020 and 2021.   The pattern is similar for Austin, though instead of a sustained increased rate of evictions, Austin returned to average rates after two months (April and May of 2022) of rates well above the average. Both of the other two Texas cities that Eviction Lab tracked (Dallas and Fort Worth) saw similar patterns. Meanwhile, the rest of the country that is monitored by Eviction Lab did not experience any spike or extended period of rates above average. Most every other state or city saw a slow return to normality from low rates during the pandemic.

The Kinder Institute for Urban Research at Rice University in March 2023, cited data indicating that 25% of students in the Houston Independent School District faced repeated eviction filings in a compressed time period. Among those evictions, more than 70% of the students living in a household that faced an eviction filing were Black, 25% were Hispanic, and less than 5% were White.[37] This data would suggest that evictions disproportionately faced Black households and households with children, both protected groups under the federal and Texas Fair Housing Act.

## Pandemic Programs

Shortly after the beginning of the pandemic, the federal government began enacting legislation aimed at helping renters and homeowners. On March 27, 2020, the Coronavirus Aid Relief and Economic Security Act (CARES),--a $2.2 trillion Federal stimulus bill--was passed. On December

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[36] Racial Differences in Economic Security: Housing. U.S. Department of the Treasury, November 4, 2022. https://home.treasury.gov/news/featured-stories/racial-differences-in-economic-security-housing

[37] Brannen, John. "As evictions reach historic levels in Harris County, families in Houston ISD are bearing the brunt" March 21, 2023 < https://kinder.rice.edu/urbanedge/evictions-reach-historic-levels-harris-county-families-houston-isd-are-bearing-brunt>

28, 2020, the $920 billion Consolidated Appropriations Act was passed. The final bill during 2021, the $1.9 trillion dollar American Rescue Plan (ARP), passed on March 11, 2021. On April 2, 2020, TDHCA began receiving federal funds allocated to combat the COVID-19 pandemic. TDHCA has used these federal funds to combat the COVID-19 pandemic by creating new programs and providing supplemental allocations to existing programs.  Information on these programs can be found below.

**Community Development Block Grant-CARES Act (CDBG-CV)**

The purpose of CDBG CARES was to provide funding to low- and moderate-income persons and/or communities intended to prevent, prepare for, and respond to COVID 19.   Six CDBG activities were funded through the CDBG CARES program: Texas Emergency Rental Assistance Program (TERAP), Texas Emergency Mortgage Assistance Program (TEMAP), Legal Services for Persons with Disabilities, Assistance for Persons with Disabilities, and Food Bank Distribution Assistance.  The Community Resiliency Program (CRP) is currently active.  CDBG CARES program activities are as follows:

- TERAP – The rental assistance program provided financial assistance to low- and moderate-income individuals and families in need of assistance.  TERAP funding was made directly to the landlord or property owner.  Funds dedicated to this activity assisted households with no more than six months of rental assistance, including arrears.
- TEMAP – The mortgage assistance program provided financial assistance to low- and moderate-income individuals and families in need of assistance.  TEMAP funding was made directly to the mortgage lenders / loan servicers.  Funds dedicated to this activity assisted households with no more than six months of mortgage assistance, including arrears.
- Legal Services for Persons with Disabilities provided financial assistance for legal services designed to address the specific needs and rights of people with disabilities whose housing had been impacted by the COVID 19 pandemic.
- Relief to Providers for Persons with Disabilities provided financial assistance to providers and facilities that assisted persons with disabilities.
- Food Bank Distribution Assistance provided funding to Feeding Texas which in turn provided funding to their network of 21 food banks serving all 254 counties in Texas in assisting with critical food distribution.
- The Community Resiliency Program funds will allow for improvement to facilities to address gaps in future pandemic emergency response capacity in rural and small metro areas in Texas.  Funding was made available for the CDBG eligible activity of public

Pandemic Response and Other Initiatives

facilities and improvements as well as for the purchase of publicly owned emergency medical services vehicles to support pandemic related activities. (this program is ongoing and no data will be collected until projects are complete)

CDBG-CV data charts[38]:

**TERAP**

| PROGRAM | American Indian/ Alaskan Native | Asian | Black/ African American | Native Hawaiian/ Other Pacific Islander | White | Other multi-racial | Total all races | | Hispanic | Not Hispanic | Total Persons |
|---|---|---|---|---|---|---|---|---|---|---|---|
| TERAP | 121 | 99 | 6,120 | 38 | 8,310 | 1,918 | 16,606 | | 7,553 | 9,053 | 16,606 |
| | 0.73% | 0.60% | 36.85% | 0.23% | 50.04% | 11.55% | 100.00% | | 45.48% | 54.52% | 100.00% |

**TEMAP**

| PROGRAM | American Indian/ Alaskan Native | Asian | Black/ African American | Native Hawaiian/ Other Pacific Islander | White | Other multi-racial | Total all races | | Hispanic | Not Hispanic | Total Persons |
|---|---|---|---|---|---|---|---|---|---|---|---|
| TEMAP | 187 | 110 | 2,053 | 40 | 8,639 | 748 | 11,777 | | 7,528 | 4,249 | 11,777 |
| | 1.59% | 0.93% | 17.43% | 0.34% | 73.35% | 6.35% | 100.00% | | 63.92% | 36.08% | 100.00% |

**LEGAL SERVICES FOR PERSONS WITH DISABILITIES**

| PROGRAM | American Indian/ Alaskan Native | Asian | Black/ African American | Native Hawaiian/ Other | White | Other multi-racial | Total all races | | Hispanic | Not Hispanic | Total Persons |
|---|---|---|---|---|---|---|---|---|---|---|---|

[38] Note, CDBG-CV program activities did not all require the same level of demographic data collection. Charts for each activity will have varying levels of data presented. Urgent need activities did not require subrecipients to track race or disability.

| | | | Pacific Islander | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Legal Services for Persons with Disabilities | 9 | 8 | 149 | 0 | 368 | 216 | 750 | | 154 | 596 | 750 |
| | 1.20% | 1.07% | 19.87% | 0.00% | 49.07% | 28.80% | 100.00% | | 20.53% | 79.47% | 100.00% |

**RELIEF TO PROVIDERS FOR PERSONS WITH DISABILITIES**

| | |
|---|---|
| # of Providers that received assistance: | 50 |
| # of Persons assisted by a disability services Provider: | 3,592 |

**FOOD BANK ASSISTANCE**

| # Persons assisted by Member Food Banks | Total pounds of food purchased by Member Food Banks |
|---|---|
| 3,501,117 | 30,578,546 |

**Emergency Solutions Grant Program-CARES Act (ESG-CV)**

**The ESG Program received $103,646,620 from the HUD CARES Act** "to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus under the Emergency Solutions Grants program (42 U.S.C. 11371)." As of December 15, 2023, the program has distributed $98,298,596.49 to 95,759 individuals financially impacted by the pandemic.

TDHCA has used this HUD funding to award grants to units of general local government, private nonprofit entities, and other entities that are identified as eligible subrecipients for ESG CARES under waiver authority from HUD. Subrecipients provide persons experiencing homelessness and at risk of homelessness the services necessary to quickly regain stability in permanent housing. ESG CARES funds may be utilized for the rehabilitation or conversion of buildings for use as emergency shelter for persons experiencing homelessness; temporary emergency shelter; the

payment of certain expenses related to operating emergency shelters; essential services related to emergency shelters and street outreach for persons experiencing homelessness; and, homelessness prevention and rapid re-housing assistance such as landlord incentives, rental assistance, and utility assistance.

TDHCA programmed its ESG funds regionally for each of the HUD-designated Continuum of Care (CoC) Regions according to a combination of the region's proportionate share of a number of factors. The factors included total population, number of persons experiencing homelessness based on the Point-in-Time count submitted to HUD by the CoCs; persons living in poverty; renters with incomes less than 30% AMI that experience cost burden; the amount of ESG CARES funding received by the CoC Region; and other factors as listed in the administrative rules governing the ESG Program. The second allocation of ESG CARES was programmed specifically for rental assistance and associated costs under the rapid rehousing and homeless prevention activities.

HUD provided waivers and flexibilities to assure recaptured funds are reallocated in a manner consistent with the statutory purposes and conditions for ESG-CV funds.

## Texas Rent Relief Program (TRR)

A full analysis of the TRR program is not currently possible, as the program is finishing its closing activities. Additionally, the funds could be used to assist households more than once, so using all the data available would risk duplication errors. As a result, this analysis will focus only on initial tenant applications that received a substantive review, were either approved or denied, and have not been flagged for irregularity/fraud. Additionally, unlike many other chapters in this AI, because there are ongoing processes to finalize data for the TRR program, in order to reduce confusion, this analysis will not reproduce any data dashboards.

Through the Texas Rent Relief Program (TRR), TDHCA distributed more than $2.2 billion in rent and utility assistance to more than 323,000 Texas households impacted by the COVID-19 pandemic. Through the Texas Eviction Diversion Program, a partnership between TDHCA, the Office of Court Administration, the Supreme Court of Texas, and the Office of the Governor, TDHCA set-aside 10% of TRR funding for applicants facing eviction. More than 25,000 applicants received more than $243 million in TEDP assistance and had their evictions stopped and made confidential from their records.

Applicants to the TRR program were disproportionately Black or African American. Texas is, in any given year, between 11 and 13 percent Black or African American, yet Black households made up approximately 50% of TRR applicants and 42% of all households that received TRR funds for rental assistance. Meanwhile, Hispanic or Latino households were underrepresented, making up only 28% of applicants and 27% of households awarded.

A comprehensive analysis of the factors leading Black Texans to be overrepresented among TRR applicants and Hispanic/Latino Texans to be underrepresented among TRR applicants is outside the scope of this report. Additionally, it should be noted that these trends are not necessarily specific to TRR or to the pandemic. However, these findings may suggest difficulties faced by Black renter households and Hispanic renter households. The finding that Black households were overrepresented among TRR applicants may support the conclusion that Black renter households are more often negatively impacted by economic shocks, based on previous data showing Black Americans being more heavily impacted by spikes in unemployment.[39]

Similar to Black households, Hispanic Americans experience higher unemployment rates both regularly and in spike events compared to the rest of the country.[40] The expectation would be that these households would also show an outsized need for rental assistance during events like the Covid-19 pandemic. However, this expectation did not translate to a proportional number of Hispanic households applying for TRR assistance. Identifying the possible cause of this underrepresentation of Hispanic renters among TRR applicants is outside the scope of this report.

While language barriers are often identified as one of the reasons that Hispanic and Latino households might be underrepresented in some assistance programs, the TRR Program was very proactive in ensuring that outreach and application materials were translated and available in Spanish as well as other languages. In order to provide outreach to speakers with limited English proficiency, the Department made the TRR application, website, FAQs and marketing materials available in the five most commonly spoken languages in the state, including: English, Spanish, Korean, Chinese and Vietnamese. The program specifically mailed more than 410,000 postcards in English and Spanish to low-income renters statewide and distributed via community partners over 500,000 program flyers and door hangers in five different languages. The program also implemented a call center that provided customer service directly in English and Spanish, and accessed a language line to provide customer service with interpretation in over 100 other languages.

**Texas Homeowner Assistance Fund (HAF)**

A full analysis of the HAF program is not currently possible, as the program is finishing its closing activities and the funds could be used to assist households more than once, so using all the data

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[39] St. Louis Federal Reserve FRED Economic Data https://fred.stlouisfed.org/series/TXUR

[40] St. Louis Federal Reserve FRED Economic Data https://fred.stlouisfed.org/series/TXUR

available would risk duplication errors. Additionally, unlike many other chapters in this AI, because there are ongoing processes to finalize data for the HAF program, in order to reduce confusion, this analysis will not reproduce any data dashboards.

Under the American Rescue Plan, Texas received several allocations for a handful of different programs. The largest of these was the Homeowner Assistance Fund (HAF), which granted Texas $840 million to help homeowners with past due mortgages, property taxes, and utilities and prevent foreclosures.

Texas has one of the lowest homeownership rates in the nation, at 62.4% of occupied housing units being owner-occupied. Only California, New York, Nevada, and the District of Columbia have lower rates.[41] Additionally, Black homeownership rates are disproportionately low. Black households make up only 8.5% of owner-occupied units, while making up 20% of renter-occupied units. For reference, Black households make up 12.8% of all households in Texas.[42] The HAF program's applicant pool was 27.4% Black or African American, indicating that the pandemic had a larger impact on Black homeowners in Texas. Despite making up 53.4% of owner-occupied units, White non-Hispanic households represented just 20.3% of HAF applicants. These numbers remain essentially unchanged when looking at applications that were awarded funds. Hispanic applicants similarly made up a disproportionate share of HAF applicants, making up 31.0% of owner-occupied households but accounting for 50.4% of HAF applications. These data point toward the conclusion that Black and Hispanic homeowners disproportionately felt the economic impact of the pandemic compared to their White non-Hispanic counterparts. This is not to say that White households were not affected, as White applicants received a combined $130 million in relief through HAF. White households did require less aid from HAF on average, being awarded, an average of $13,431. Black households were awarded only slightly more on average ($13,885), with Asian households needing the most average assistance, at $17,481.

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[41] American Community Survey, Table DP04. 2022 5-Year data table and map.
https://data.census.gov/map/010XX00US_040XX00US01,02,04,05,06,08,09,10,11,12,13,15,16, 17,18,19,20,21,22,23,24,25,26,27,28,29,30,31,32,33,34,35,36,37,38,39,40,41,42,44,45,46,47,48 ,49,50,51,53,54,55,56/ACSDP5Y2022/DP04/DP04_0046PE?g=DP04%20Texas&layer=VT_2022_0 40_00_PP_D1&loc=29.2223,-108.8724,z3.8266

[42] American Community Survey, Table S2502. 2022 5-Year data table
https://data.census.gov/table/ACSST5Y2022.S2502?q=texas%20housing&moe=false&tid=ACSS T1Y2022.S2502

## Housing Stability Services (HSS)

Through the Housing Stability Services (HSS) Program, TDHCA has allocated more than $209.8 million of ERA funds to local communities and nonprofits to keep Texans housed and prevent homelessness. Through December 2023, 98,746 households have been assisted by HSS-funded organizations. Of the total ERA HSS funds, $44.5 million has been allocated to legal aid organizations to provide eviction prevention and other housing stability related legal services. So far, 39,328 households have received free legal assistance, including representation in eviction court, legal counsel, and mediation services. Through local partners, HSS has also assisted 32,941 households with free legal counsel to prevent eviction and address fair housing violations. The HSS Program is estimated to continue through July 2025.

The HSS program was designed to help households at or below 80% AMI to avoid or move up out of homelessness. This could take the form of several services, including case management, housing search assistance, short term hotel vouchers, landlord incentives to obtain housing or avoid eviction, rental application fees, rental deposits, or utility deposits. Black households (12.8% of all Texas households, 20% of renter households) are overrepresented, accounting for 35% of HSS-assisted households. However, if we look at individuals experiencing homelessness as the comparison group, then Black Texans (43% of the homeless population of Texas[43]) are slightly underrepresented. HSS service slightly overserved households with children. 35.8% of those in poverty in Texas are minors[44] and 35.2% of all Texas households have a related minor child[45], compared to 43.8% of HSS-served households that had a minor child in it. Finally, HSS-served households had a disproportionately high rate of female heads of household (67.1%), compared to the population at large and the population in poverty (50.0% and 55.2%[46] respectively). Considering the nature of the services provided by HSS, it is prudent to look at both populations to make comparisons, as some activities are targeted for individuals experiencing homelessness and some are targeted at low-income renter households working to avoid homelessness. With that in mind, it is difficult to draw any solid conclusions about the needs of

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[43] Texas Homeless Data Sharing Network Data Dashboard. Texas Homeless Network. December 18, 2023. https://www.thn.org/thdsn/data/

[44] American Community Survey, Table S1701. 2022 5-Year data table https://data.census.gov/table/ACSST5Y2022.S1701?q=s1701&g=040XX00US48

[45] American Community Survey, Table S2502. 2022 5-Year data table https://data.census.gov/table/ACSST5Y2022.S2501?q=Household%20Size%20and%20Type&g=040XX00US48

[46] American Community Survey, Table S1701. 2022 5-Year data table https://data.census.gov/table/ACSST5Y2022.S1701?q=s1701&g=040XX00US48

Texans, other than to say that homelessness and being at risk of becoming homeless is a real possibility for many low-income Texans.

Another portion of HSS was the use of funds to provide legal counsel and services to low-income Texans. The primary reason for this part of the program was to assist in representing tenants in eviction hearings or providing legal advice related to those hearings. By the end of 2023, this program had helped to prevent or otherwise mitigate the impacts of 6,108 evictions.

### HOME-American Rescue Plan (HOME-ARP)

Another program funded by the American Rescue Plan Act was the HOME Investment Partnerships Program-ARP (HOME-ARP) program. HOME-ARP is designed to prevent homelessness, assist households attempting to flee domestic violence, dating violence, sexual assault, or stalking, and to spur multifamily development for cost-burdened households typically making less than 30% of AMI.

As of December 31, 2023, the HOME-ARP program in Texas had approved 171 rental units set aside for the state's qualified population. These units are not yet built, or leased up, making any kind of analysis incredibly limited in scope. To receive funds from HOME-ARP, properties must submit their tenant selection criteria to TDHCA for review by both HOME-ARP staff and the Department's Fair Housing Coordinator. For more information about the HOME-ARP program in Texas, see TDHCA's website (https://www.tdhca.texas.gov/programs/home-american-rescue-plan). Because the program is so new, and no units have reached project completion at the time of writing, demographic breakdowns on this program are not possible.

## COVID-19 Pandemic and Impediments

The pandemic, as ubiquitous as its effects seemed to be, did not have a deleterious effect on all areas of fair housing. Of the five impediments identified in 2019, only three of them felt any substantive negative effects from it.

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

The lending portion of the impediment was not noticeably affected, however the disproportionate need for Homeowner Assistance Fund assistance among Black homeowners does suggest that the pandemic posed an obstacle for them. Black homeowners in Texas were more likely to need mortgage and property tax assistance than other groups.

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

Between increased eviction rates that were felt disproportionately by Black and Hispanic renters and the outsized impact it had on their need to find emergency rental assistance, the pandemic raised additional barriers for some protected classes that limited their ability to remain in their housing, which is an integral part of housing choice.

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

Unlike the previously mentioned impediments, the influx of federal assistance funds available to the State of Texas had a positive effect on how much information about fair housing rights and duties and available programs to assist low-income Texans. As an example, TDHCA utilized both HUD FHEOI grant funds and American Rescue Plan funds to generate posters in English and Spanish that explained basic fair housing rights and directed viewers to TDHCA's pandemic and normal programs for assistance. TDHCA produced over 50,000 posters, and distributed over 30,000 of those copies to stakeholders across the state. These actions have not, of course, solved the lack of understanding of rights, resources, and available programs, and the impediment still exists.

## Conclusion

Based on a review of TDHCA's pandemic relief programs, two primary observations are made:

1. Certain protected groups under the Fair Housing Act appear to be disproportionately impacted by deleterious exogenous economic disruptions.

2. TDHCA relief programs aimed at easing the impact of acute shocks to the economy may have assisted in contributing toward positive action in addressing impediments because these programs were able to reach the protected groups identified in the review of programs.

# Chapter 8 - Disaster Recovery in Texas

## Disaster Vulnerability in Texas

### Introduction

### Introduction

The State of Texas, with its varying geographical regions and climates, presents a wide variation of vulnerability to all types of disasters within its borders. In understanding why such a wide variety of hazards can occur across Texas, a general overview of the geographical characteristics of the state and the correlating weather patterns is warranted.

The following information, as referenced in the most recent State of Texas Hazard Mitigation Plan and CDBG-DR/MIT Action Plans, works to adequately explain these variations in more detail.

### Cumulative Impact of Recent Disasters-Updated in last action plan

In 2010, Texas entered into a historic period of drought which resulted in the driest 12-month period on record with a statewide average of only 11.18 inches of rain. This drought contributed greatly to a series of catastrophic wildfires from November 2010 to December of 2011 which burned 3.9 million acres and damaged or destroyed approximately 5,900 structures. Similar drought conditions have been present in Texas consistently as drought is considered to be the most-occurring natural disaster in the State; the most recent incident of drought has been active since July of 2022, causing multiple active wildfire seasons.

Severe drought conditions also led to a higher risk level for flash flooding as conditions greatly impacted the ability of soils to effectively absorb water runoff. In 2015 and 2016 Texas received record amounts of rainfall resulting in six Federal Disaster Declarations spread over 160 of the state's 254 counties. To date, the state of Texas still estimates $2 billion in unmet need from these events. On August 25, 2017, Hurricane Harvey made landfall between Port Aransas and Port O'Connor as a Category 4 hurricane with sustained winds of over 130 mph. After the initial impact, Hurricane Harvey's winds began to decrease, but due to two high-pressure systems to the east and west of the storm, it remained fixed over the Texas coast for the next 4 days. During this period, as much as 60 inches of rain fell over the impacted area in 5 days. The GLO estimates the cost of damages from Hurricane Harvey at $120 billion, making it one of the costliest events in U.S. history.

Less than a year after Hurricane Harvey, moderate to severe drought conditions were noted again throughout South Texas. However, on June 18, 2018, a tropical wave making landfall in South

Texas brought heavy rain and thunderstorms, impacting some of the same communities that were impacted by Hurricane Harvey as well as the 2015 and 2016 Floods.

Nearly a year after the 2018 South Texas Floods, the 2019 Lower Rio Grande Valley flooding event hit this same region of Texas. This event, almost acting as an identical weather occurrence, brought heavy rain and thunderstorms which compounded the impact of previous events, including the 2015 and 2016 flooding events which caused extensive damage.

In September 2019, Tropical Storm Imelda made its effects felt along the Southeast Texas coast. Tropical Storm Imelda's impacts were seen in only a portion of the area where Harvey hit but did cause higher levels of localized flooding in some of these areas when compared to the devastating hurricane. Many counties impacted by Tropical Storm Imelda and Hurricane Harvey had also been impacted by the 2015 and 2016 flooding events.

From February 11 to February 21, 2021, the 2021 Winter Storms brought freezing temperatures, snow, and ice to the southern United States, causing the National Weather Service to place the entire state of Texas under a winter storm warning. Up to seventeen and a half inches of snow was recorded in some areas of the state, accompanying ice accumulation of up to an inch per day and low temperatures ranging from 13F in Houston to -11F in Amarillo. These conditions, as well as the unprecedented length for which they lasted, caused approximately 69 percent of Texans to lose power at some point during the disaster, per the University of Houston Hobby School of Public Affairs, and the deaths of 246 people, according to the Texas Department of State Health Services.

HUD has recognized the nature of the disasters that the state of Texas experienced from 2015 to 2018; in August 2019 and January 2021, HUD (through Federal Register Notices), allocated over $4.3 billion to 140 of Texas' 254 counties to fund mitigation efforts for impacted areas of the aforementioned disasters (known as the CDBG-MIT program). This was done by gathering information regarding the impacts and remaining unmet need from the disasters, the actions taken during and after the disasters, and the risks and impacts on impacted communities. A mitigation needs assessment was completed that included specific details about needs in the eligible and most impacted and distressed communities, as well as risks to and impact on housing and infrastructure.

The below map highlights the counties that have been substantially impacted by the aforementioned disasters, as well as the counties declared under the 2018 CDBG-MIT award.

**Figure 8-1: CDBG-DR Eligible Counties in Texas**
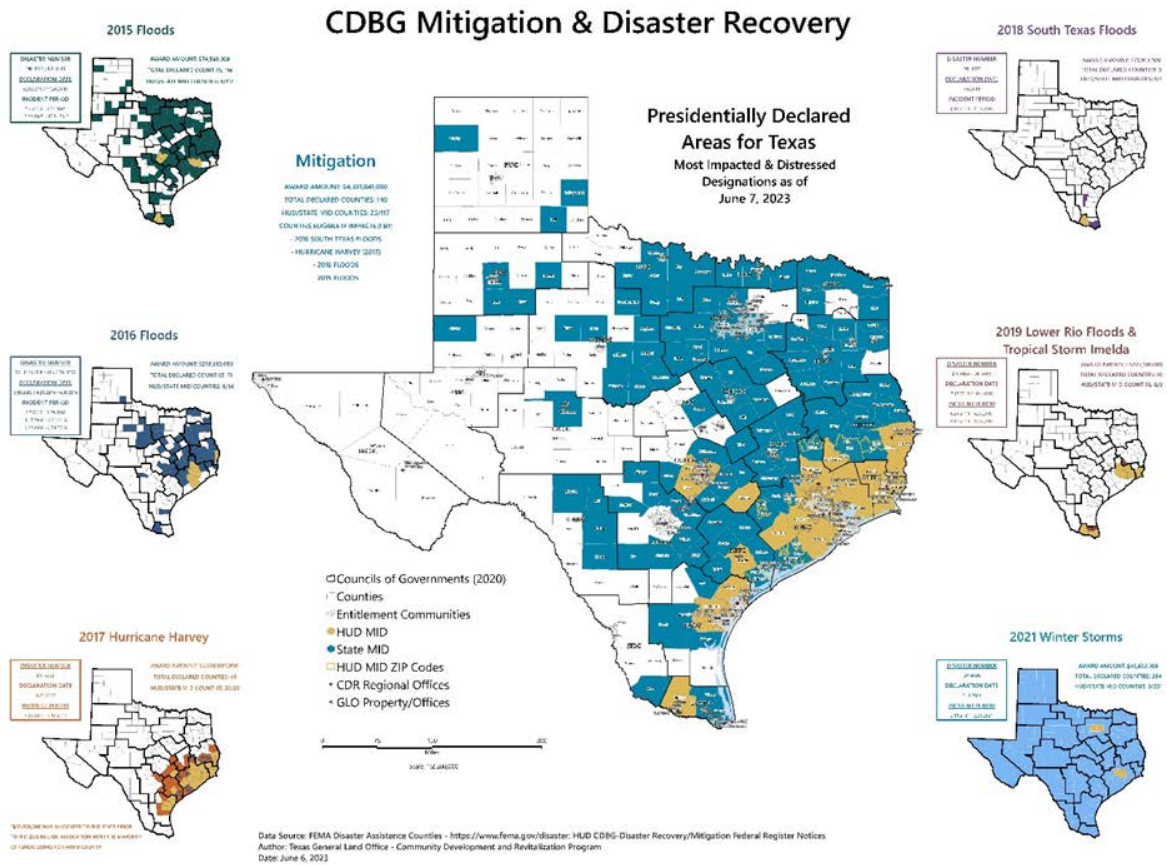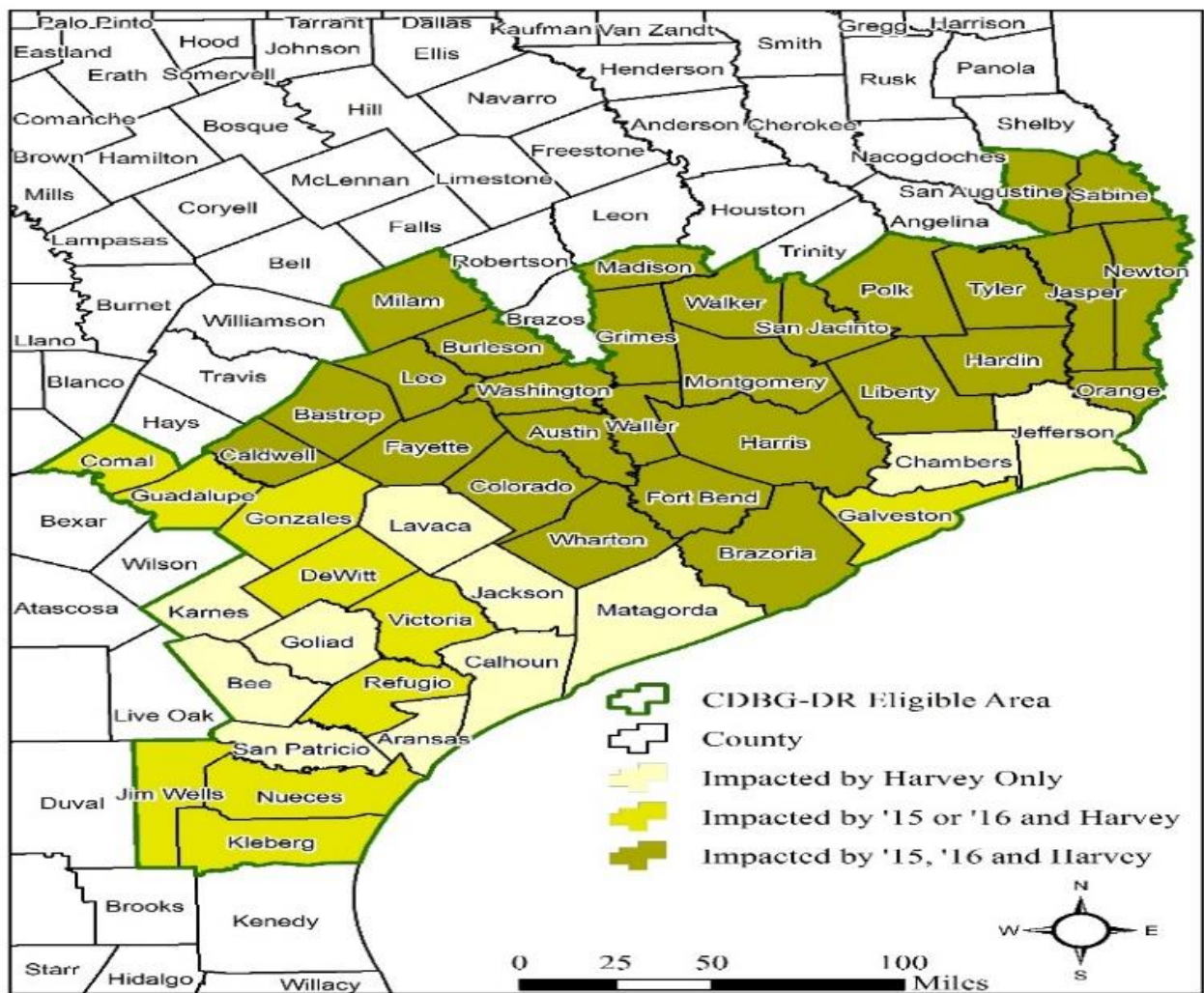
## Mitigation Efforts and Responsible Agencies

Mitigation, as defined by the Texas Department of Public Safety State Hazard Mitigation Plan, covers sustained actions taken to reduce or eliminate long-term risk to people and their property from the effects of natural hazards. These efforts are shared by the Texas Division of Emergency Management (TDEM) and the Texas General Land Office (GLO) as the primary state agencies charged with the administration of disaster recovery funds.

## Federal Emergency Management Agency

The Federal Emergency Management Agency was created under the U.S. Department of Homeland Security for the primary purpose of coordinating responses to disasters that have

occurred in the United States that significantly overwhelm the resources of local and state authorities.

Typically, FEMA aids local and state authorities during and immediately following a disaster by coordinating the deployment of federal officials into the impacted area to implement federal programs. These duties include, but are not limited to, post-disaster damage assessments, provision of Temporary Sheltering Assistance, and the administration of Direct Temporary Housing Programs.

FEMA also maintains mitigation responsibilities through its Mitigation Directorate, the primary vehicle through which mitigation efforts, programs, and policies are designed to identify risks and reduce injuries, loss of property, and recovery time.

FEMA is also the facilitating agency for the Building Resilient Infrastructure and Communities (BRIC) Grant program (formerly Pre-Disaster Mitigation grant program) which are made available to eligible communities through a national competition. These grants provide mitigation funding for activities such as acquiring property for conversion to open space, retrofitting existing buildings, constructing tornado and storm shelters, managing vegetation for erosion and fire control, and implementing small flood control projects.

## Texas Division of Emergency Management

The Texas Division of Emergency Management (formerly known as the Texas Department of Emergency Management) is the primary state agency tasked with coordinating the State Emergency Management Program. The State Emergency Management Program coordinates with state and local governments to develop processes and procedures that work to lessen the impact of emergencies and disasters.

TDEM achieves these goals by implementing programs to increase public awareness about threats and hazards, coordinating emergency planning, providing an extensive array of specialized training for emergency responders and local officials, and administering recovery and hazard mitigation programs within the State of Texas.

## TDEM Field Response Personnel and Districts

TDEM District Coordinators are the field response personnel stationed throughout the State and have a dual role as they carry out both emergency preparedness activities and coordinate emergency response operations. In their preparedness role, District Coordinators assist local officials in carrying out emergency planning, training, and exercises, and develop emergency teams and facilities. In their response role, District Coordinators deploy to incident sites to assess damage, identify urgent needs, advise local officials regarding state assistance, and coordinate the deployment of state emergency resources to assist local emergency responders.

District Coordinators are responsible for the preparedness and response duties within their specific region. These regions are identified on the below:

**Figure 8-2: Texas Division of Emergency Management Preparedness Units**
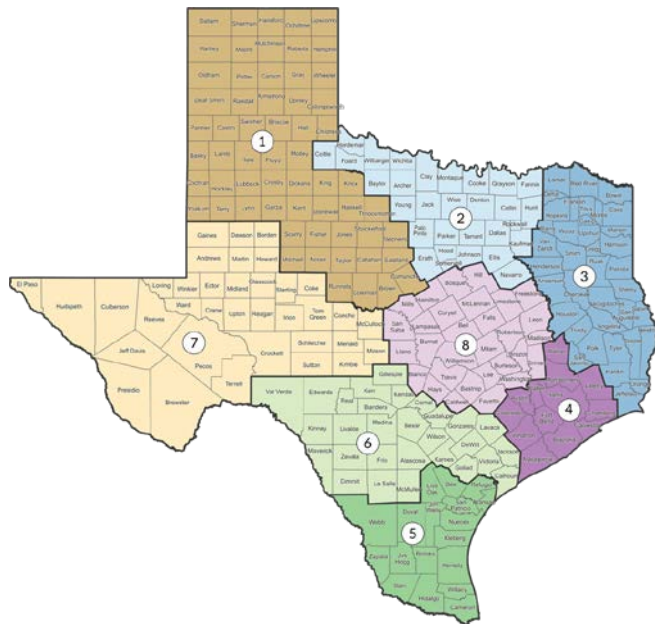


## TDEM Preparedness Units

TDEM, in administering the statewide emergency management and preparedness program, has divided duties and responsibilities among the following Preparedness Units:

(a) Exercise Unit. The Exercise Unit provides support to local jurisdictions, regional and state level agencies, and Voluntary Organizations Active in Disaster to design, conduct, and evaluate emergency exercises at all levels.

(b) State Planning Unit. The State Planning Unit develops and maintains state-level emergency plans, promulgates state standards for local emergency management plans, assists cities and counties in developing emergency plans, and reviews more than 2,000 local plan documents each year for compliance with state planning standards.

(c) Technological Hazards Unit. The Technological Hazards Unit coordinates State efforts to enhance the emergency preparedness and response capabilities of communities throughout Texas for disasters that may include hazardous materials, industrial pollution, nuclear radiation, toxic wastes, dam failures, transportation accidents, factory explosions, fired, and chemical spills.

(d) Training Unit. The Training Unit manages and delivers a diverse curriculum of emergency management and hazardous materials training for state and local emergency responders, state, local, and regional officials, and volunteer groups active in disasters.

(e) Continuity of Operations Unit. The Continuity of Operations Unit serves as the subject matter expert for continuity of operations planning within the state. This unit develops, articulates, and maintains strategy and continuity procedures, facilitates training workshops for federal, state, and local government organizations and develops continuity policy and procedures.

## Mitigation Unit

The Mitigation Unit of TDEM is responsible for maintaining the State Hazard Mitigation Plan, reviews local mitigation plans, and provides hazard mitigation training for local officials. In the aftermath of major disasters, members of this unit deploy to the Joint Field Office (JFO) to set up disaster recovery operations and coordination planning for post-disaster mitigation programs with federal counterparts and local officials.

TDEM's Mitigation Unit also administers the Building Resilient Infrastructure and Communities (BRIC) Grant program (formerly Pre-Disaster Mitigation grant Program) and Hazard Mitigation Grant Program (HMGP) to provide Federal grant funding to cities, counties, and other governmental entities to carry out local and regional hazard mitigation programs. These programs, also known as 404 Mitigation, are funded by FEMA and administered by the State of Texas. These grants are designed to (1) prevent or reduce future loss of lives and property through the identification and funding of cost-effective mitigation measures and (2) minimize the costs of future disaster response and recovery.

## Texas General Land Office

The Texas General Land Office (GLO) is the Governor-appointed agency to administer Community Development Block Grant funds allocated for Disaster Recovery activities (CDBG-DR) Funds after a Presidentially Declared Disaster in the State of Texas. Since officially taking on these responsibilities, the GLO has helped impacted communities utilize more than $10 billion in CDBG-DR funds to aid in the recovery from events dating back to 2005, including Hurricanes Rita, Ike, and Dolly, 2011 wildfires, 2015 and 2016 flooding events, Hurricane Harvey in 2017, and several flood events in 2018 and 2019. Projects implemented using these funds were completed more recently, the GLO received more than $4 billion for mitigation activities through CDBG-Mitigation (CDBG-MIT).

# Disaster Recovery Funding

## Introduction

The Community Development Block Grant Disaster Recovery Program (CDBG-DR) is conducted by the U.S. Department of Housing and Urban Development (HUD) and the Texas General Land Office's Community Development and Revitalization Program Office (GLO-CDR). The CDBG-DR

Program was designed to aid cities, counties, and States in their recovery from Presidentially declared disasters by creating policies and procedures for to govern the administration of federal funding allocated via special Congressional appropriations. The overall funding process and timeline is presented below. Figure 8-3: Disaster Funding Process and Timeline



## Disaster Funding Process and Timeline

- Major Disaster Declaration issued by the President of the United States.
- Up to twelve months after the Major Disaster Declaration, Congress may appropriate disaster recovery funding.
- Between two and six months after Disaster Recovery funds have been appropriated by Congress, HUD publishes, through the Federal Register, how those funds are to be allocated for impact areas and specific rules to govern those allocations.
- Once funds have been allocated, the GLO is given 90 days to draft an Action Plan outlining the proposed usage of those funds for HUD approval.
- Once submitted to HUD, the initial review process may take up to 45 days with the potential for a delay should HUD reject the initial Action Plan draft and require a second submittal with certain alterations.
- Once an Action Plan has been approved by HUD, the GLO has up to six months to work with impacted communities in determining the best Method of Distribution and Fund Allocation to address the disaster recovery needs within each impacted community; and

- Following the Method of Distribution process, the GLO works closely with impacted communities to implement programs to complete approved disaster recovery projects.

## Eligible Activities

In determining whether projects are eligible for grant fund award, the GLO must document that the proposed project meets one of the following HUD designated criteria:

1) Funds are allocated to address a need that is directly related to the damage caused by the Presidentially Declared Disaster;

(2) Funds are allocated to address a need that meets an established National Program Objective[47]; or

(3) Funds are allocated to address a CDBG-DR eligible activity.

Unless waived by HUD, 70% of the aggregate of all CDBG-DR funds must be utilized in a manner that benefits the Low- and Moderate-Income population in the disaster impact area.

Funding may not duplicate activities paid from FEMA, the Small Business Administration, the U.S. Army Corps of Engineers, or any other funding source identified under the law. All allocations of CDBG-DR funds will, through the publication of the Federal Register, outline specific regulations pertaining to each appropriation including percentage spits between housing and infrastructure activities.

## General Land Office Long-term Residential Activities

In utilizing CDBG-DR funds for the benefit of impacted single-family homeowners, the GLO may utilize any of the following program types:

(1) Rehabilitation. CDBG-DR funds may be used to finance the repair or restoration of housing units in disaster-impacted areas to applicable construction codes and standards and may include any of the following:
   - Privately owned buildings and improvements for residential purposes;
   - Improvements to single-family residential property which is also used as a place of business; or

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[47] (1) Benefitting low- and moderate-income persons; (2) Aiding in the prevention of slums or blight; or (3) Meeting a need that has particular urgency.

- Manufactured housing when such housing constitutes part of the community's permanent housing stock.

(2) Reconstruction. CDBG-DR funds may be utilized for the demolition and re-building of stick-built or modular housing units on the same lot in substantially the same footprint and manner.

(3) New Construction. CDBG-DR funds may be utilized to fund new construction of units if the activity clearly addresses a disaster-related impact and is located in a disaster-affected area.

(4) Down Payment Assistance. CDBG-DR funds may be utilized to provide housing assistance in the form of counseling on the home purchasing and financing process and cash subsidies for down payments. Eligible applicants and properties are determined on the program level and must comply with all federal regulations.

(5) Homeowner Reimbursement. Expenses incurred by homeowners for repairs to a primary residence prior to application of funds for other programs may be eligible for reimbursement up to an amount specified by the GLO.

(6) Buyouts. Buyout programs support hazard mitigation, floodplain management goals, and resiliency by removing homeowners from the floodplain and eliminating the risk of future flood vulnerability.

(7) Resiliency Measures. Beyond the above-listed programs, the GLO will also seek to incorporate home resiliency solutions which may include the following:
- Elevating the first floor of habitable area;
- Breakaway ground floor walls;
- Reinforced roofs;
- Storm shutters;
- Use of Energy Star appliances and fixtures; and
- Mold and mildew resistant products.

## General Land Office Infrastructure Activities

The GLO, in utilizing CDBG-DR and CDBG-MIT funds, has continually fostered coordination between federal, state, local, private, and nonprofit sources to assist impacted communities in developing both housing and infrastructure projects that may include the following:

(f) Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements.

(g) Clearance, demolition, and removal of buildings and improvements.

(h) Repair of streets, sidewalks, parks, playgrounds, publicly owned utilities, and public buildings.

## General Land Office Planning Activities

CDBG-DR funds may be utilized for planning activities to include gathering data, conducting studies, analysis, and preparation of plans and identification of actions that may implement such plans. These activities may include, but are not limited to, the following:

- Comprehensive plans;
- Community Development plans;
- Functional plans to include:
  - Housing;
  - Land use and urban environmental design;
  - Economic Development;
  - Open space and recreation;
  - Energy use and conservation;
  - Floodplain and wetlands management;
  - Transportation;
  - Utilities; and
  - Historic preservation.

## Previous Planning Studies

| |
|---|
| CHARM Platform Development ($19,000,000) – The CHARM software is currently bolstering local planning efforts by running scenario planning workshops with local communities. When integrated with the disaster database project, this enhancement would provide local communities with the information, tools, and technical expertise to make informed planning decisions. |
| Developing Environmental Responses & Models for Catastrophic Flooding Events-Phase 2 ($3,000,000) - The purpose of the second phase is to propose ways of alleviating the persistent environmental and health impacts of catastrophic flooding in Jefferson County, using the strategy developed from the study conducted on the Dickinson Bayou watershed during Phase 1. |
| Developing Effective Flood Risk Communication Tools for Texas Communities ($3,000,000) – We are leveraging the Measuring, Mapping, and Managing Flood Risk study completed by Texas A&M to expand the disaster plain to the mitigation area and further refine disaster risk communication tools for communities to use. |
| Disaster Recovery Alternative Housing Study ($1,210,561) – This is an effort to analyze and evaluate alternative housing options to determine if innovative solutions exist for accommodating disaster survivors, including those with low to moderate incomes, that are |

cost-effective, prudent, secure, and allow for faster construction. After research, this study will proceed with the development of prototypes.

Flood Studies within Combined River Basins ($92.000,000) – Three regionalized studies, based on Texas' major river basins covering the Harvey-impacted area, will evaluate mitigation and abatement strategies to reduce disaster impacts and increase community resiliency. TWDB, TDEM, USACE, and USGS are a few of the stakeholders that helped GLO design the scope of the study and will continue to benefit from the study as the results become publicly available. For example, GLO is coordinating with TWDB to ensure the project assessments will be included in the State Flood Plan.

Green Infrastructure for Texas ($2,086,380) – This study will provide nature-based solutions to stormwater management. Through outreach, coalition building, education, and on-the-ground projects, this grant seeks to stimulate communities to implement green infrastructure projects at any scale.

Lower Rio Grande Valley Economic Development Study ($ 1,009,229) - This study will develop strategies to expand the economy of three counties in the Valley impacted by 2019 Floods to make them more resilient to future economic impacts while recovering.

Lower Rio Grande Valley (LRGV) Flood Study ($10,000,000) – A regional flood study, encompassing Hidalgo, Willacy, Cameron, and Starr counties, that mirrors the ongoing Flood Studies within Combined River Basins study.

Lower Rio Grande Valley Transportation Study ($472,500) - This study will evaluate how city populations located in low tide sections of towns in three counties in the Rio Grande Valley can evacuate on foot to shelters during high rainfall events so that first responders can focus on other issues.

North Central Texas Council of Governments Study ($4,000,000) – This forward-thinking study will look to dissolve silos and improve delivery of consolidated, adaptive infrastructure before expected population growth makes addressing these issues more difficult and costly. The focus of the study is on (1) Transportation Infrastructure and Safety, (2) Stormwater Runoff, and (3) Environmental Features and Tools.

Project Management Services ($4,194,000) – Provider shall perform the comprehensive project management services necessary to assist the GLO in fulfilling its duty to administer the four flood studies within Combined River Basins Study.

Regional CHARM Enhancements ($11,169,253) – Using a combination of 2018, 2019, and MIT funding to provide better service for vulnerable regions, we are working with AgriLife to enhance existing CHARM capabilities to provide regional planning and coordination

capabilities. This will require super-computing capabilities and large- scale stakeholder engagement for the LRGV and East Texas communities affected by the 2018 & 2019 disasters. In addition, CHARM workshops to walk communities through the process of developing RCP/LHMPP plans and create a training program to increase local competence and capacity.

Resilient Housing Study ($792,875) – This study will evaluate the resilience of HAP homes that have been subjected to multiple disasters through a random sampling and analysis. The study will have three phases: first establish a statewide zoning resource, second capture the long-term beneficiary experience, and finally develop educational materials on the recovery process and resilient home maintenance.

State Hazard Mitigation Plan ($5,000,000) – The GLO is partnering with the Texas Division of Emergency Management (TDEM) to provide CDBGMIT funds for the development of a State of Texas Hazard Mitigation Plan. The plan makes a state eligible for assistance up to 15 percent for estimated aggregate amounts of a disaster. The state hazard mitigation plan should serve as the framework for the local hazard mitigation plans within that state.

Technical Flood Model Reviewer ($21,640,337) – Provider will perform engineering oversight services being performed previously by USACE. Such services are necessary to meeting the GLO's CDBG-MIT goal of reducing flooding risks and prevent associated damages in Texas in the event of a disaster.

Texas Disaster Information System (TDIS) ($41,459,740) – The GLO and A&M are working to create and oversee a system capable of securing the state's disaster data needs, which will ultimately serve as a critical tool assisting Texas communities develop better disaster recovery and mitigation plans.

Texas Integrated Flood Framework (TIFF) ($13,000,000) – The GLO is actively coordinating with USACE/USGS/TWDB to ensure flood planning efforts are not duplicated. Through the establishment of intergovernmental workgroups, this grant seeks to standardize data sharing, flood modeling, and planning activities. TWDB is the grant recipient and the lead agency for completing this work.

## Current Planning Studies

Alternative Housing – Implementation and Testing – The purpose of this study is to build and test four (4) alternative housing options to determine if there are innovative solutions for accommodating disaster survivors, including LMI, that are cost effective, safe, secure, and allow for faster construction. *Not yet started*

CHARM Platform Development ($19,000,000) – The CHARM software is currently bolstering local planning efforts by running scenario planning workshops with local communities. When integrated with the disaster database project, this enhancement would provide local communities with the information, tools, and technical expertise to make informed planning decisions.

Developing Environmental Responses & Models for Catastrophic Flooding Events-Phase 2 ($3,000,000) - The purpose of the second phase is to propose ways of alleviating the persistent environmental and health impacts of catastrophic flooding in Jefferson County, using the strategy developed from the study conducted on the Dickinson Bayou watershed during Phase 1.

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Disaster Recovery Alternative Housing Study ($1,210,561) – This is an effort to analyze and evaluate alternative housing options to determine if innovative solutions exist for accommodating disaster survivors, including those with low to moderate incomes, that are cost-effective, prudent, secure, and allow for faster construction. After research, this study will proceed with the development of prototypes.

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Resilient Housing Study ($792,875) – This study will evaluate the resilience of HAP homes that have been subjected to multiple disasters through a random sampling and analysis. The study will have three phases: first establish a statewide zoning resource, second capture the long-term beneficiary experience, and finally develop educational materials on the recovery process and resilient home maintenance.

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Technical Flood Model Reviewer ($21,640,337) – Provider will perform engineering oversight services being performed previously by USACE. Such services are necessary to meeting the

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| Texas Disaster Information System (TDIS) ($41,459,740) – The GLO and A&M are working to create and oversee a system capable of securing the state's disaster data needs, which will ultimately serve as a critical tool assisting Texas communities develop better disaster recovery and mitigation plans. |
| Texas Integrated Flood Framework (TIFF) ($13,000,000) – The GLO is actively coordinating with USACE/USGS/TWDB to ensure flood planning efforts are not duplicated. Through the establishment of intergovernmental workgroups, this grant seeks to standardize data sharing, flood modeling, and planning activities. TWDB is the grant recipient and the lead agency for completing this work. |

## General Land Office Economic Development Activities

CDBG-DR funds may be utilized for a wide range of Economic Revitalization Activities within impacted communities. These activities include any activity that demonstrably restores and improves the local or regional economy and are not limited to activities that create or retain jobs.

In response to prior disasters, the GLO has coordinated efforts with impacted communities to conduct economic development activities to include the following:

(i) Provision of loans and grants to businesses.
(j) Provision of funding for job training.
(k) Building of educational facilities to teach technical job skills.
(l) Making improvements to commercial or retail districts in the impact area; and
(m) Financing other efforts that attract and retain workers in devastated communities.

Beyond this list, CDBG-DR funds are permitted to be utilized in the form of direct assistance to a small business[48] or a business that can demonstrate that the usage of grant funding is reasonable and critical to long-term recovery.

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[48] Small business as defined at 15 U.S.C. 632(a)

## Texas General Land Office and FEMA

Up and until Hurricane Harvey made landfall, the GLO was tasked with ensuring all CDBG-DR funds were utilized to implement long-term recovery programs in disaster impacted areas in a manner that complied with federal law. Although this fact remains, the large-scale impact of Hurricane Harvey warranted an unprecedented GLO-FEMA partnership to effectively and efficiently administer what have historically been FEMA operated response programs. This partnership included the merging and implementation roles to ensure that several forms of Direct Temporary Housing Assistance were made available to disaster victims in the most efficient way possible.

## FEMA Partnered Short-Term Residential Activities

On September 14, 2017, Texas Governor Greg Abbott designated the GLO as the state agency to partner with FEMA in leading short-term housing recovery programs. These programs were intended to provide direct housing solutions for some permanent repairs and offer temporary housing solutions to other applicants deemed eligible by FEMA. The following sections provide a very rudimentary overview of the programs implemented through this partnership.

## Multi-Family Lease and Repair

The Multi-Family Lease and Repair Program permits the GLO or its subrecipient to repair or improve existing multi-family housing structures. By accepting program funded repairs and improvements, property owners agree to lease a defined percentage of units to eligible disaster victims for up to 18 months after the disaster declaration. This program is not intended to repair or improve individual housing units, but allows for the repair or improvement of existing multi-family housing which the GLO may then utilize as a temporary housing resource for eligible applicants.

## Direct Lease

The Direct Lease Program enables the GLO or its subrecipient to enter into leases on behalf of FEMA or on behalf of eligible applicants to utilize properties that would typically not be available to the public. This program seeks to utilize housing outside of the general public market, like corporate housing or certain types of vacation homes, to increase the stock of option available to eligible applicants.

## Manufactured Housing Units

The Manufactured Housing Program allows for the provision of Manufactured Housing Units for eligible applicants to provide temporary housing for those who are unable to make use of financial temporary housing assistance due to a lack of available housing resources.

## Recreational Vehicles

The Recreational Vehicle Program allowed for the provision and placement of Recreational Vehicles to eligible applicants to provide temporary housing to those who are unable to make use of financial temporary housing assistance due to a lack of available housing resources. Currently the program is completed.

## Direct Assistance for Limited Home Repair (DALHR)

The DALHR Program allows for the provision of assistance to complete permanent partial repairs to homes with significant damage. Repairs, in accordance with the rules adopted during this particular implementation period, may not exceed the lesser of 50% of the home's fair market value or $60,000 Need to add when it was closed or completed and final numbers

## Partial Repair and Essential Power for Sheltering (PREPS)

The PREPS Program worked with homeowners to complete temporary repairs on homes to permit applicants to occupy the structure while they await more permanent repair solutions. Temporary repairs may include window units for air conditioning and heating, establishing a functioning bathroom, and the installation of small cooking appliances. This program worked to ensure that the applicant's home can serve as a safe and sanitary shelter for the homeowner until more permanent solutions could be explored. The program is currently completed.

# Harvey Data

## Introduction

Hurricane Harvey made landfall along the Texas coastline on August 25, 2017, between Port Aransas and Port O'Connor as a Category 4 storm with sustained winds of 130 mph.  During the four days that followed, Hurricane Harvey's wind speeds decreased, the storm stalled, and as much as 60 inches of rain fell over the impacted area. This record amount of rainfall, combined with the fact that Hurricane Harvey made landfall twice, created a three-event narrative for this disaster: (1) the initial landfall with sustained high winds in Aransas County; (2) the unprecedented rainfall in the Houston metroplex; and (3) a secondary landfall that caused massive flooding in Southeast Texas. In response to these events, Congress passed two separate appropriations bills which were then allocated by HUD to the state of Texas as follows:

(1) On December 27, 2017, HUD allocated an initial amount of CDBG-DR funds in the amount of $57.8 million to the state of Texas via 82 FR 247. For this particular allocation, HUD identified Harris County as 'most impacted and distressed' and required that at least 80% of the allocation be utilized to address unmet needs within

the County. The remainder of this allocation, as determined by the GLO, was dedicated to Aransas, Nueces, and Refugio Counties for an affordable rental program.

(2) On February 9, 2018, HUD allocated a secondary amount of CDBG-DR funds in the amount of $5.024 billion. HUD identified the following counties and ZIP codes as most impacted and distressed: Aransas, Brazoria, Chambers, Fayette, Fort Bend, Galveston, Hardin, Harris, Jasper, Jefferson, Liberty, Montgomery, Newton, Nueces, Orange, Refugio, San Jacinto, San Patricio, Victoria, Wharton, 75979, 77320, 77335, 77351, 77414, 77423, 77482, 77493, 77979, and 78934. Of this amount, HUD determined that Harris County and the City of Houston would receive direct allocations to implement disaster recovery programs within their respective jurisdictions.

## Impact Overview

The Texas General Land Office estimates that over 1 million homes were impacted by Hurricane Harvey with the state spending more than $1.1 billion on response and recovery. As of February 2, 2018, the FEMA Public Assistance Program (PA) estimated damage costs at approximately $29.2 billion. The FEMA Individual Assistance Program (IA) received over 896,000 applications for assistance and has disbursed over $1.55 billion in housing assistance and other emergency related disaster assistance.

According to the Texas Legislative Budget Board, the state of Texas reports $421.3 million in actual Hurricane Harvey related state expenditures for Fiscal Years 2017-2018 and projects an additional $747.1 million in state expenses through Fiscal Year 2019.

As required, a needs assessment was completed to identify long-term needs and priorities for CDBG-DR funding. This assessment takes into account a comprehensive set of data sources that cover multiple geographies and sectors and includes specific details about the unmet needs for the eligible and most impacted and distressed designated counties. The following table outlines a summary of unmet need as originally included in the initially submitted Action Plan:

**Figure 8-4: Summary of Total Unmet Need for State Allocation Program Amounts**

| Category | Unmet Need | % of Total Unmet Need | State Program Allocation Amount | % of State Program Allocation |
|---|---|---|---|---|
| Housing | $24,040,632,591 | 15% | $1,823,844,297 | 77% |
| Infrastructure | $88,242,533,143 | 62% | $435,605,083 | 18% |
| Economic Development | $24,526,183,916 | 23% | $105,363,344 | 5% |
| Total | $316,809,349,916 | | $2,364,812,724 | |

## Impact Demographics

The 49 CDBG-DR eligible counties affected by Hurricane Harvey cover 15% (39,496 square miles) of land area in the state and contained approximately 32% of the state's total population (nearly 8.9 million Texans) according to the 2016 census.

Of the 3.4 million housing units in the eligible counties, 62.5% were owner-occupied units. Some housing and income demographics were slightly different in the eligible counties versus the statewide averages. The 49 eligible counties had an estimated median owner-occupied housing unit value and median household income lower than the state as a whole. The median value of owner-occupied housing units was $105,800, almost $37,000 less than the statewide median value of $142,700 at the time. The 49 eligible counties had a median household income of $50,145, which was $4,582 less than the statewide average of $54,727. In addition to a lower median household income, the per capita income was also lower than the state as a whole. Approximately 14.9% of the population in the 49 eligible counties were living in poverty; this was just less than the statewide average of 15.6%.

By percentage, the 49 eligible counties had a higher African American population when compared to the state as a whole. The 49 eligible counties had a 16.27% African American population — approximately 3.67% higher than the statewide total. The minority population as a whole in all 49 eligible counties was approximately 62.21% — 2.7% higher than the statewide total.

In the 49 eligible counties, veterans accounted for 4.9% of the population, the elderly accounted for approximately 11.73%, and disabled persons under the age of 65 accounted for 7.65% of the population. These numbers are in line with state averages.

**Figure 8-5: 2016 Demographic Statistics for Texas and the 49 CDBG-DR Eligible Counties from the U.S. Census Bureau**

| | Texas | 49 CDBG-DR Eligible Counties | |
|---|---|---|---|
| **Fact** | **Estimates** | **Estimates** | **Percent of Area** |
| Population estimates, 2016 | 27,862,596 | 8,861,831 | 32% of Texas Population |
| Population, percent change - April 1, 2010, (estimates base) to July 1, 2016 | 10.80% | 12% | |
| Persons under 5 years, percent, 2016 | 7.20% | 645,145 | 7.28% of Eligible Population |
| Persons under 18 years, percent, 2016 | 26.20% | 2,319,282 | 26.17% of Eligible Population |

| Fact | Texas Estimates | 49 CDBG-DR Eligible Counties | |
|---|---|---|---|
| | | Estimates | Percent of Area |
| Persons 65 years and over, percent, 2016 | 12.00% | 1,039,153 | 11.73% of Eligible Population |
| White alone, percent, 2016 | 79.40% | 6,593,176 | 74.40% |
| Black or African American alone, percent, 2016 | 12.60% | 1,441,957 | 16.27% |
| American Indian and Alaska Native alone, percent, 2016 | 1.00% | 88,954 | 1.00% |
| Asian alone, percent, 2016 | 4.80% | 565,728 | 6.38% |
| Native Hawaiian and Other Pacific Islander alone, percent, 2016 | 0.10% | 8,875 | 0.10% |
| Two or More Races, percent, 2016 | 1.90% | 163,599 | 1.85% |
| Hispanic or Latino, percent, 2016 | 39.10% | 3,244,050 | 36.61% |
| White alone, not Hispanic or Latino, percent, 2016 | 42.60% | 3,558,315 | 40.15% |
| Housing units, 2016 | 10,753,629 | 3,444,036 | |
| Owner-occupied housing unit rate, 20122016 | 61.90% | 2,152,669 | 62.5% of Housing Units |
| Median value of owner-occupied housing units, 2012-2016 | $142,700 | $105,800 | |
| Median gross rent, 2012-2016 | $911 | $777 | |
| With a disability, under age 65 years, percent, 2012-2016 | 8.10% | 678,268 | 7.65% of Eligible Population |
| Median household income (in 2016 dollars), 2012-2016 | $54,727 | $50,145 | |
| Persons in poverty, percent | 15.60% | 14.9% of Eligible Population | |
| Land area in square miles, 2010 | 261,231.71 | 39,496 | 15% of Texas |

## Low- and Moderate-Income Analysis

The following map identifies census block groups that have low- and moderate-income population of 51 percent or more for the 49 eligible counties using HUD's 2017 Low- and

Moderate-Income Summary Data (LMISD) for the state of Texas.[49] Figure 8-6: Percentage of LMI Population by Block Group (2017)
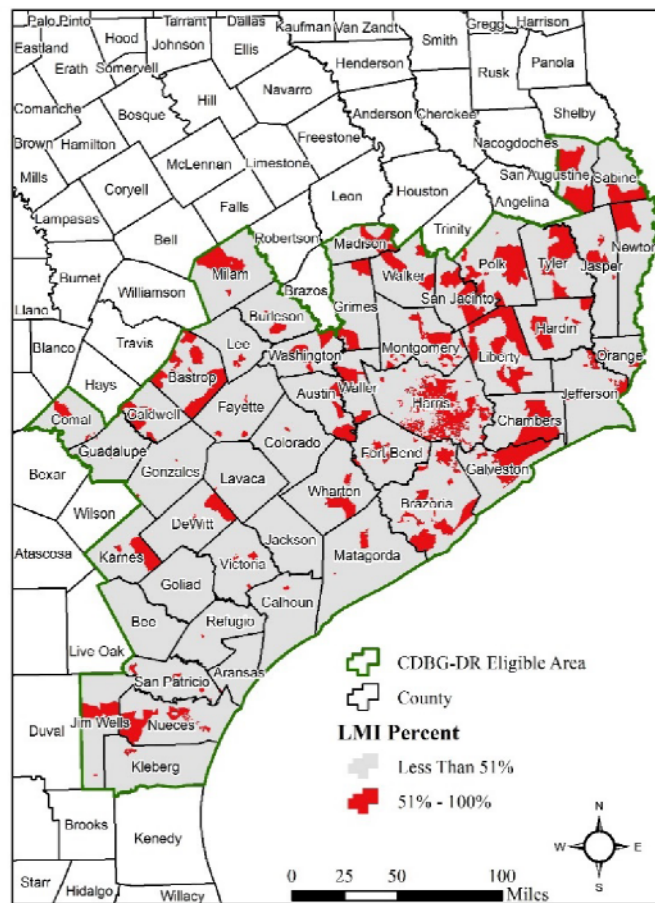


## Disaster Recovery Programs: Other Issues

The Texas General Land Office, as the primary administrator of CDBG-DR funds, has been able to identify how the following issues, when viewed through a disaster recovery lens, can impact the overall recovery process in impacted areas.

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[49] HUD Exchange. "FY 2017 LMISD by State - All Block Groups, Based on 2006-2010 American Community Survey." Webpage accessed January 10, 2018. https://www.hudexchange.info/programs/acs-low-mod-summarydata/acs-low-mod-summary-data-block-groups-places/

**Issue 1 - Not in My Backyard Syndrome can create barriers to housing choice for protected classes in some communities.**

The Texas General Land Office, through its administration of CDBG-DR programs, often encounters 'Not in My Backyard Syndrome' (NIMBY) related opposition from citizens residing in or around where a proposed project is to be built. To effectively address the concerns of these citizens and combat the potential barriers to housing choice that NIMBYism can create, the GLO works to unify communities during the planning process through a robust citizen participation process as required under the law[50]. This process, depending upon the specific Federal Register requirements for each allocation, may include the following public participation processes and procedures for each proposed CDBG-DR project:

1. Publication of a proposed projects in a manner that affords citizens, affected local governments, and other interest parties a reasonable opportunity for examination[51];
2. Notification of proposed projects to affected citizens through different mediums such as electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations; and
3. Holding public meetings in which citizens may air their concerns, receive structured feedback, and collaborate with other citizens in the area to determine the most effective and efficient means of project implementation.

In furthering a cohesive disaster recovery process, the GLO consults across multiple jurisdictions to particularly address issues and solutions that extend beyond the geographical impact area of individual projects[52]. By consulting with adjacent units of local government, agencies with metropolitan-wide planning responsibilities, and public housing authorities, the GLO indirectly combats NIMBYism by allowing all citizens to participate and have their concerns adequately addressed.

Additionally, the GLO works to create a more inclusive disaster recovery environment for all impacted citizens by implementing programs in compliance with an extensive list of federal requirements. The GLO must certify compliance with, at a minimum, the following for each program or project it undertakes

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[50] Citizen Participation requirements are published in detail in the Federal Register that corresponds with each allocation of CDBG-DR funding. Standards may also be found at 24 CFR §570.431(b) and 24 CFR §91.105.

[51] Publication efforts must meet the effective communications requirements found at 24 CFR §8 and other fair housing and civil rights requirements.

[52] 24 CFR §91.100(a)(4) and (5).

*24 CFR §570.602: Section 109 of the Act*

Section 109 of the Act requires that no person in the United States shall on the grounds of race, color, national origin, religion, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance made available pursuant to the Act. This provision also states that the prohibition against discrimination on the basis of age under the Age Discrimination Act and the prohibition against discrimination on the bases of disability under Section 504 shall apply to programs or activities receiving Federal financial assistance.

*Title VI of the Civil Rights Act of 1964*

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on a basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that are provided or the manner in which they are provided.

*The Fair Housing Act*

The Fair Housing Act protects people from discrimination based on race, color, national origin, religion, sex, disability and the presence of children when they are renting, buying, or securing financing for housing.

*Affirmatively Furthering Fair Housing*

Affirmatively Furthering Fair Housing (AFFH) requires that federal grantees further the purposes of the Fair Housing Act through the provision of an effective planning approach to aid program participants in taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

The GLO, in its' interpretation of current AFFH requirements under the law, has taken the step to conduct AFFH reviews. This review process and all of its inner workings are being carefully crafted to ensure the most effective and efficient review process possible. To date, this review process will, at a minimum, include an assessment of the following as it relates to each project: area demography, socioeconomic characteristics, housing configuration and needs, education opportunities, access to public transportation, healthcare opportunities, and environmental hazards or concerns. It is the hope of the GLO that these reviews will present relevant data and establish solid reasoning to support the usage of CDBG-DR funds for certain recovery projects.

The GLO works to ensure that all policies, processes, and procedures associated with CDBG-DR Program implementation adequate reflect and adhere to, at a minimum, the above-listed provisions. Through effective usage of these provisions, the GLO fosters a more inclusive disaster recovery environment that actively combats NIMBYism.

**Issue 2 - There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements and programs to assist persons with disabilities and low-income residents.**

The GLO, as the primary administrator of CDBG-DR funds, is committed to providing technical assistance, at all levels of the grant administration process, to local governments, stakeholders, and the public. Often times, this technical assistance includes an educational aspect to provide all impacted parties with a basic knowledge of programs and the underlying laws that established them. This includes, but is not limited to, technical assistance for application processes, procurement processes, environmental processes, and overall grant administration.

The GLO's provision of grant administration-related technical assistance provides the greatest source of aid in terms of educating all grant participants in grant administration on fair housing requirements and programs that may directly impact low-income and disabled residents.

In the immediate aftermath of Hurricane Harvey, technical assistance was immediately offered by the GLO to impacted communities through a bi-weekly conference calls with local emergency personnel and elected officials. Beyond these calls, executive level leadership from the Community Development and Revitalization team, including Commissioner Bush, made repeated trips to the impacted areas. To date, the GLO has augmented staff and on-boarded more than thirty personnel, some of who are based locally in the impacted communities.

**Issue 3 - The public is not sufficiently aware of how to obtain assistance necessary to protect fair housing rights.**

The GLO, though not an agency that receives funding directly for the provision of general education and guidance on fair housing rights for everyday citizens, does undertake efforts to indirectly address this impediment to fair housing.

All CDBG-DR programs must be conducted in a manner that complies with, at a minimum, all of the following Fair Housing related laws:

1. 24 CFR Part 1: Nondiscrimination in Federally Assisted Programs of HUD[53];
2. 24 CFR Part 3: Nondiscrimination on the Basis of Sex in Education Programs or Activities receiving Federal Financial Assistance[54];
3. 24 CFR Part 8: Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development[55];

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[53] Implementing regulations for Title VI of the Civil Rights Act of 1964.
[54] Implementing regulations for Title IX of the Education Amendments Act of 1972.
[55] Implementing regulations for Section 504 of the Rehabilitation Act of 1973.

4.  24 CFR Parts 91.325(a)(1): Affirmatively Furthering Fair Housing[56]; and
5.  24 CFR 570.487(b): Affirmatively Furthering Fair Housing[57].

The GLO works to ensure that program participants are exposed to these statutes and the protections they afford by included each of these citations on applicable documents throughout the CDBG-DR administration process.

In terms of providing program participants with sufficient knowledge to obtain assistance in protecting their fair housing rights, the GLO is in the process of updating and reviewing policies and procedures to ensure that this information is adequately presented through programmatic paperwork and public outreach materials.

**Issue 4 - Protected classes may experience disparities in home mortgage loan denials.**

The GLO does not, to date, administer any federally funded disaster recovery programs that directly handle the approval or denial of home mortgage loans for disaster recovery applicants. It should also be noted that federal law prohibits the GLO from utilizing CDBG-DR funds for a forced mortgage payoff in instances where a homeowner with an outstanding mortgage is required, under the terms of their loan, to repay the balance of the loan prior to taking assistance to rehabilitate or reconstruct their home.

Despite these facts, the GLO indirectly furthers fair housing objectives through its administration of direct temporary housing programs. These programs, Partial Repair and Essential Power for Sheltering and Direct Assistance for Limited Home Repair, provide very basic and minimal work to a disaster survivor's home to allow the homeowner to shelter in place for an extended period until more permanent repairs can be completed. By keeping homeowners in their homes, these programs prevent survivors from enduring the financial hardships associated with paying for a livable shelter while simultaneously paying on the mortgage for a home that is not deemed habitable. Overall, these programs work to help homeowners remain in good standing for current home mortgage loans which may prevent them for having to apply for a subsequent loan in the event of a default or home sale.

The GLO, as permitted through the Federal Register, may implement down payment assistance programs as a part of its CDBG-DR programs. Although this type of program would not be instituted for the sole purpose of furthering the fair housing objective listed in this impediment,

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[56] Each State must certify that they will affirmatively further fair housing.
[57] Each state and local government must certify that it will affirmatively further fair housing.

it has the potential to influence any disparities in home mortgage denials for certain protected classes if there is a correlation between down payment availability and mortgage loan granting.

**Issue 6 - There are barriers to mobility and free housing choice for protected classes.**

The GLO, as the primary administrator of CDBG-DR funds, has made efforts to address any potential barriers to mobility and free housing choice for protected classes.

The GLO may, in coordination with impacted communities, implement disaster recovery programs and projects that may result in the acquisition of real property and/or the displacement of persons from their homes, businesses, or farms. When these types of situations arise, the GLO utilizes policies and procedures that align directly with the Uniform Relocation Act to emphasize the following:

- Provision of uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects;
- Ensuring relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement;
- Ensuring that no individual or family is displaced unless decent, safe, and sanitary housing is available within the displaced person's financial means;
- Aid in the improvement of housing conditions of displaced persons living in substandard housing; and
- To encourage and expedite acquisition by agreement and without coercion.

The GLO, in planning programs and projects, consistently ensures that adequate time, funding, and staffing are available to carry out certain responsibilities under the law. Some of those responsibilities, as listed by program or project type, are as follows:

*Real Property Acquisition*

- Appraisal of the property before negotiations;
- Inviting the property owner to accompany the appraiser during the property inspection;
- Providing the owner with a written offer of just compensation and a summary of what is being acquired;
- Payment for the property before taking possession; and
- Reimbursement expenses resulting from the transfer of title such as recording fees, prepaid real estate taxes, or other expenses.

*Residential Displacements*

- Providing relocation advisory services to displaced tenants and owner occupants;
- Providing a minimum of 90 days written notice to vacate prior to acquiring possession; and
- Reimbursement of moving expenses.

*Nonresidential Displacements (Businesses, Farms, and Non-Profit Organizations)*

- Providing relocation advisory services;
- Providing a minimum 90 days written notice to vacate prior to acquiring possession; and
- Reimbursement of moving expenses.

The totality of services listed above are offered to any and all citizens who may be impacted by a CDBG-DR project or program regardless of race, color, religion, national origin, sex, age, or physical or mental disability.

# Chapter 9 - Lending Analysis

## Introduction

The Fair Housing Act specifically applies to home loan financing across all protected classes. A lack of equal opportunity in lending may result in disparate impact in housing opportunities among the protected classes under the Fair Housing Act. For this purpose, this section analyzes the Home Mortgage Disclosure Act (HMDA) data for the state of Texas for 2022, the latest data available, in order to analyze possible disparities in lending opportunities among protected classes where information is available (HMDA data does have information on the applicants sex, race, and ethnicity, but does not have information on the applicants national origin, religion, familial status, or whether the applicant is a person with a disability). Disparity in terms of access to credit and access to quality credit sources, such as traditional lenders like banks, could result in certain protected classes facing higher barriers to becoming homeowners and accessing lending products. HMDA requires that certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions, gather and submit loan data that can be used to assist in identifying possible discriminatory lending patterns.

## General Loan Data and Methodology

It should be noted that this analysis is not specific to TDHCA administered programs, but rather statewide data and trends. From 2018 through 2022, more than 3,600,000 loan applications covered under HMDA were filed in Texas for the purchase of primary residences. The data contains enough demographic information for an analysis, however the ability to draw conclusions about the cause or causes of disparity between various categories of applicants is limited.[58] Of the loan applications for primary residences, 2,700,000 loan applications resulted in the loan being originated by the financial institution. Note that the numbers from table to table do not necessarily add up to the same totals due to missing or incorrectly coded data, differences between the number of loans that listed no co-applicants, or other phenomena. To get the most

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[58] The Supreme Court's opinion in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015) (*ICP*), is controlling on the issue of sufficiency of statistical evidence to make a *prima facie* case of disparate impact discrimination under the Fair Housing Act. In ICP, the Court adopted a standard that requires the plaintiff identify a <u>particular facially neutral practice</u>, prove a <u>robust causal connection</u> between the identified practice and the claimed disparate impact, and demonstrate that the disparate impact <u>causes a barrier to housing</u>. *See ICP*, 135 S. Ct. at 2523. The data presented in this analysis is not sufficient to satisfy the ICP standard, and no practice or policy described in this section is being identified as creating a barrier to fair housing.

accurate current picture, the following analysis will only use the latest available year, 2022. 2018 and 2019 will be 5 or more years out of date by the time this analysis is published. Furthermore, 2020 and 2021 were possibly influenced by factors related to COVID-19 that would be difficult, if not impossible, to account for. More discussion on how COVID-19 affected Texans can be found in the Pandemic Initiatives chapter of this document.

In order to make sure that this analysis was as useful and accurate as possible, some types of applications were omitted from the analysis. Only mortgage applications for primary residences, for non-business or commercial purposes, with completed applications for single family homes were included.

**Home Loan Applications in 2022 with or without Originations**

| | | |
|---|---|---|
| **Applications with No Loan Origination** | 262,547 | 37.8% |
| **Loans Originated** | 364,562 | 58.1% |
| **Total** | 627,109 | 100% |

Source: Home Mortgage Disclosure Act Data, 2022.
Note: Not all columns will add up to exactly 100% due to rounding.

# Sex

In 2022, male-only applications (applications where only one primary applicant was listed and was male), made up only 28.4% of loan applications, while female-only applications lagged behind that number, making up 17.1% of applications. The largest category was joint applications (31.1%), where there were two listed primary applicants. This is not surprising, as a household with two adults is more likely to have a higher income or have the resources and built up wealth to apply for a home mortgage loan. The remaining applications lacked information about the sex of the applicant(s).

**\*\*\*For all figure links cited below, click on that link and navigate to the tab that corresponds to the figure title. Once in Tableau, to highlight a specific region use the Region drop down located on the right hand side of the Tableau mapping window. Check only the box of the Region you would like to view. Please note that you may select multiple Region boxes to compare data across regions.\*\*\***

**Figure 9-1: Loan Denials by Sex**

There is a small disparity in denial rates between male and female primary applicants. Applicants that were filed non-jointly with a woman as the primary applicant were slightly more likely to be denied than applications where the primary applicant was male. One aberration in the data is the extremely low denial rate on applications where the sex of the primary applicant is not clear.

There are no significant differences in reasons for home loan denial between sexes. Male applicants and female applicants did not differ in terms of primary reason for denial, though joint applications were slightly more likely to be denied for credit history and slightly less likely to be denied based on debt-to-income ratio. This makes sense, as a joint application is more likely to have dual incomes than a single applicant, which would make incomes higher on average.

## National Origin

In the Home Mortgage Disclosure Act data, the only variable that captures national origin is ethnicity. Hispanic Texans of any race account for approximately 40% of the Texas population. However, Hispanic applicants in Texas account for just over 31% of mortgage loan applications statewide.

**Figure 9-2: Loan Actions by Ethnicity**

Hispanic loan applicants were denied 18.7% of the time, while non-Hispanic applicants and joint applicants (applications where one member of the application was Hispanic and the other was non-Hispanic) were denied 10% and 10.6% of the time, respectively. It is important to note that this does not yet control for factors like income. Hispanic loan applicants were slightly more likely to be denied for credit history compared to non-Hispanic applicants, but this difference is small (less than 5%). No other discrepancies in the reason for denial were apparent in the data.

## Race

Black or African American individuals make up approximately 12% of the state population, and account for 10.9% of loan applications. Applicants for a home mortgage loan in Texas were more likely to be White than the population as a whole. Conversely, Asian Texans were twice as likely to apply for a home loan, when compared to statewide demographics. American Indian or Alaska Native applicants made up less than 1% of all applications, despite accounting for more than 2% of the population.

**Figure 9-3: Loan Actions by Race**

When it comes to the reasons for denial, there are some disparities that become apparent. Asian households, for example, are almost exclusively denied due to a high debt-to-income ratio. Black applicants are significantly more likely to be denied due to debt-to-income ratio as well, when compared to White applicants. One explanation of this is that traditional credit sources, like banks, have historically been far more common in White affluent areas, and were much less common in neighborhoods that were more heterogeneous or majority-minority. Without access to traditional forms of credit, it is harder to manage debt. Black households were also much less

likely to be denied for collateral or employment history or lack of sufficient cash. This suggests that a major hurdle for Black loan applicants is the lack of access to traditional credit.

**Figure 9-4: Reasons for Denial by Race**

Though this might appear to be indicative of a disparity in lending, it cannot be reasonably concluded without further study to control for actual debt-to-income ratio and credit score of the applicants. However, the Consumer Financial Protection Bureau (CFPB), which is the federal entity responsible for disclosing HMDA data to the public, has not included the credit score relied upon in making a credit decision for a loan application. This information is not included in the publicly disclosed, loan-level data reported by financial institutions.

The closest the current data allow as a proxy for credit score is income, despite not being well correlated. However, it is still useful to look at loan application denials by race and ethnicity while controlling for income. Income in the analysis is based upon the Federal Financial Institutions Examinations Council's (FFIEC) calculations of the local area's median family income. The FFIEC is responsible for determining uniform methods and measures for the examination of financial institutions, such as those covered under HMDA.

**Figure 9-5: Loan Denials by Income Grouping**

When attempting to control more strictly for income, the data show that even when applicants make 300% or more of the FFIEC Median Family Income, African American applicants are denied loans at a significantly higher rate than White and Asian applicants, and this difference is more pronounced as the incomes examined increase. The 300% of FFIEC Median Family Income level varies between $150,000 and $350,000 for MSAs in Texas.

## Loan Actions by TDHCA Service Region

Disparities in rates of loan application denials are also evident by national origin and are analyzed here regionally. Region 1 has abnormally high denial rates for applicants who were two or more minority races, American Indian or Alaska Native, or Native Hawaiian or Pacific Islander. Of those, only American Indian or Alaska Native had enough applications (n>30) to even make a claim about what the average denial rates were for those groups. That same region experienced much higher denial rates for Hispanic applicants and joint applications where one of the applicants was Hispanic.

In Region 2, denial rates were substantially higher for American Indian and Alaska Native applicants and Black or African American applicants. The pattern from Region 1 for Hispanic applicants continues in Region 2, with Hispanic applicants or joint applicants with at least one Hispanic member were denied at significantly higher rates than non-Hispanic applicants.

In Region 3, the Dallas-Fort Worth Metroplex, there were enough applications in every group (n>30) to generate meaningful estimates. Every minority group except for Asian applicants had higher rates of denial in Region 3 than did White applicants. However, joint applicants, where at least one applicant was White and the other was non-White, were denied at the lowest rates of any group. Again, this may be due to the increased possible income that an application with more than two possible earners. However, Hispanic applicants were approximately twice as likely to be denied compared to their non-Hispanic a joint applicant counterparts.

Region 4 is slightly anomalous in that it had, across the board, higher denial rates than the state average. However, the results otherwise were similar to most other Regions. Black and American Indian or Alaskan native applicants as well as applicants who identified as two or more minority races were denied at high rates (nearly 50% for Black applicants). White applicants were more likely to be denied compared to the statewide average, but were still less than half as likely to be denied as Black applicants. This is a signal that Region 4 has been experiencing some pressures that are making homeownership more difficult to achieve. As with other Regions, Hispanic applicants in Region 4 were more likely to be denied than non-Hispanic applicants, though both groups were denied at rates nearly twice the statewide average.

Region 5 faced similar difficulties to those of Region 4, as denial rates were higher than the state average for all groups. Denial rates were especially high for Black applicants, American Indian or Alaska Native applicants, and joint applications. White applicants were denied almost twice as often as the statewide average but were still less likely to be denied than the aforementioned groups. However, breaking from the pattern of the rest of the state, Hispanic and non-Hispanic applicants were denied at roughly the same rates, showing no significant disparities between those groups. This may be due to the already high rate of denials in the region or the area having significantly fewer Hispanic applicants than expected.

Region 6, the Houston area, continues the same patterns seen around the state. All races except for Asian were more likely than their White applicant counterparts to be denied a home mortgage loan. Asian applicants were almost half as likely to be denied compared to their White applicant counterparts. As with most other Regions, Hispanic applicants were twice as likely to be denied when compared to non-Hispanic applicants.

Region 7, which houses Austin and the surrounding counties, was no different than the rest of the state. Black, American Indian, Native Hawaiian, and applicants who were two or more minority races were significantly more likely to be denied than their White counterparts, while Asian applicants experienced low denial rates, less than half the state average. This region experienced, by far, the highest disparity between Hispanic and non-Hispanic applicants. Hispanic applicants were denied at a rate four times that of non-Hispanic applicants and 2.5 times that of joint applicants.

Region 8 follows the same pattern as previous regions with Black, American Indian, Native Hawaiian, and applicants identifying as two or more minority races being denied more often than their White counterparts, and Asian applicants experiencing low denial rates. As with the rest of the state, Hispanic applicants were denied more often than their non-Hispanic counterparts.

Region 9 represents an anomaly. While minority groups other than Asian did experience higher rates of denials, the difference in rates was much smaller than in other regions. However, Hispanic applicants were denied almost twice as often as non-Hispanic applicants.

Region 10 returns to the statewide pattern, with Black and American Indian applicants experiencing far higher rates of denials compared to White and Asian applicants and Hispanic applicants were denied more often than joint and non-Hispanic applicants.

Region 11 is anomalous, because there were so many fewer non-White applicants compared to White applicants. There were nearly 13,000 White applicants and fewer than 600 applicants who were non-White (among applications where race of applicants was known). American Indian applicants were the most likely to be denied, with White applicants also experiencing higher denial rates than most other groups. It is difficult to draw any conclusions about this region, as non-White applicants made up less than 3% of all applications. However, the anomaly continues here, with Hispanic applicants making up a large majority of all applications, and non-Hispanic applicants accounting for less than 10% (ethnicity was not known on 27% of applications). Despite this, Hispanic applicants were still more likely to be denied than non-Hispanic or joint applicants.

Region 12 is similar to region 11, in that less than 5% of applications came from non-White applicants. Still, it is possible to identify some differences in denial rates, with American Indian and Black applicants being more likely to be denied than White applicants. Again, Hispanic applicants, despite making up more than half of applications where ethnicity is known, experienced nearly three times the denial rate of non-Hispanic applicants.

Region 13 shifts away from the statewide trend, and only American Indian applicants see a disparity in denial rates, being twice as likely to be denied as other groups. Hispanic and non-Hispanic applicants also experience substantively similar denial rates, all below the statewide average.

## Discussion of Results

While there are regional differences as well as instances where the number of applicants in an identified ethnic category were too low to make statistical comparisons, denial rates were generally higher among Hispanic or Latino–identifying applicants than other groups in almost all cases. This gap appears especially prevalent in the more rural regions of the state, particularly in the Upper Rio Grande Valley along the South Texas Border (Region 11) and West Texas (Region 12). Additionally, the disparity between denial rates between White and Black or African

American applicants appears most prevalent in Upper East Texas (Region 4) and Southeast Texas (Region 5). These results essentially mirror those from the 2016 data used in the 2019 AI.

However, this analysis of HMDA data is insufficient to conclude a causal relationship between race or ethnicity and loan denial rates. The reasons for this are threefold. First, the HMDA data does not contain the actual credit scores or debt to income ratios of the applicants. Second, even if the HMDA data did contain credit scores, the formulae for generating credits scores are considered proprietary. Therefore, even if individual credit scores were known and the resulting analysis showed no clear racial or ethnic differences in the credit scores of those granted versus denied loans on the basis of credit history, there could still be underlying inputs into the credit score algorithm that inherently penalize individuals based upon race or ethnicity. An example of this would be if zip code or census tract demographics of applicants is factored into credit score, it could artificially deflate the credit scores of minorities. Third, though the HMDA data reveals the "primary reasons for loan application denials," there is no evidence of a particular lender standard for any reason (alone or in combination with other reasons) to deny a loan. This missing information precludes the ability to make causal conclusions about what is responsible for the disparity in loan denials, and whether it could be considered to be discriminatory under the Fair Housing Act.

As such, the State of Texas cannot, with any degree of certainty say that lenders are engaging in prohibited practices that present impediments to fair housing choice. However, the State does suggest that greater transparency from lenders and credit agencies in how lending decisions are made and how credit scores are derived could shed light on whether latent practices or policies are the cause of a disparity in loan denial rates. This analysis is unchanged from the 2019 AI, and suggests that disparities in lending persist, and without lenders disclosing the metrics they use to approve or deny mortgage loans and how those metrics are derived, those disparities are likely to persist. State legislative action could be taken to increase the transparency in lending practices, especially as it relates to the calculation and derivation of creditworthiness and credit scores.

# Chapter 10 - Fair Housing Trends and Complaints

This section of the AI examines fair housing complaint data across the state of Texas and considers trends and legal cases related to the issue. The Texas Fair Housing Act (the Act) prohibits discrimination on the basis of race, religion, color, sex, national origin, disability and familial status. The Act mirrors the Federal Fair Housing Act (FFHA). Texas residents who believe that they have experienced a violation of the FFHA or state fair housing laws may contact one or more of the following organizations: HUD's Office of Fair Housing and Equal Opportunity in Fort Worth (FHEO) or the Texas Workforce Commission Civil Rights Division (TWC-CRD).

## Complaints filed with the State of Texas

While the Texas Workforce Commission (TWC) is responsible for overseeing and providing workforce development services to employers and citizens, it is also the state agency designated to investigate fair housing complaints. The Civil Rights Division provides services for housing discrimination and complaint resolution, as well as conducts fair housing outreach and education to the public. The TWC-CRD maintains a webpage with information on how to file a complaint. Complaints can be filed by email, fax, hand delivery, online, or mail or can be filed electronically. Complaints cannot be taken over the phone.

**Texas Workforce Commission**
Civil Rights Division
Address: 101 E 15th St, Guadalupe CRD

Austin, TX 78778-0001
Call: 512-463-2642 or (Texas only) 888-452-4778
TTY: 512-371-7473
Fax: 512-463-2643

Those who are deaf, hard-of-hearing, or speech-impaired may contact Relay Texas for assistance at 800-735-2989 (TTY) or 512-371-7473 (TTY) and 711 (Voice). The website also has a fair housing fact sheet to help potential complainants identify housing discrimination as well as what steps they can expect TWC-CRD to follow after a complaint is filed.

Upon receiving a complaint, TWC-CRD will notify the alleged violator, or respondent, of the complaint and allow that person or organization to submit a response. An assigned TWC-CRD investigator will then proceed to determine if there is reasonable cause to believe the law has been violated. The TWC-CRD will try to reach a conciliation agreement between the complainant and respondent. If such an agreement is reached, there will be no further action unless the conciliation agreement is breached. In that case, TWC-CRD may recommend that the Texas Attorney General file suit.

If TWC-CRD determines after investigation that reasonable cause for discrimination exists, the case will be heard in an administrative hearing, unless either party files an election to have the case heard in state district court.

## Complaints filed with HUD

Housing discrimination complaints may be filed with HUD online using either an online form available in English or Spanish, or by downloading a form and emailing or mailing it to the local FHEO office a separate form that is available in Arabic, Cambodian/Khmer, Chinese, Korean, Russian, Somali, Spanish, and Vietnamese. Potential complainants may also file a complaint by calling 800-669-9777 or 800-927-9275 for TTY, or by calling HUD's regional FHEO office. HUD's Fort Worth Regional Office of FHEO serves Texas residents and may be reached by calling 817-978-5900 or 817-978-5595 for TTY.

When a complaint is received, HUD will notify the person who filed the complaint along with the alleged violator and allow the alleged violator to submit a response. The complaint will then be investigated to determine whether there has been a violation of the FFHA.

A fair housing complaint filed with HUD may be resolved in a number of ways. First, HUD is required to try to reach an agreement between the two parties involved. A conciliation agreement must protect both the complainant and the public interest. If an agreement is approved, HUD will take no further action unless the agreement is breached.

If HUD has determined that a state or local agency has the same housing powers as HUD, referred to as a substantial equivalence, HUD may refer the complaint to that state or local agency and will notify the complainant of the referral. Once a state or local agency is certified as a Substantially Equivalent Agency, HUD will typically refer complaints of housing discrimination that it receives to the certified state or local agency for investigation. The state and local agencies, called Fair Housing Assistance Program (FHAP) partners, must begin work on the complaint within 30 days or HUD may take it back. In Texas, TWC is the statewide FHAP in addition to several designated local agencies which include the City of Austin Equal Employment and Fair Housing Office, City of Corpus Christi Department of Human Relations, City of Dallas Fair Housing Office, Fort Worth Human Relations Commission, and the City of Dallas Fair Housing Office. In prior years, the City of Garland had an enforcement office, but as of December 2023, that is no longer the case.[59] In 2022, HUD awarded Fair Housing Education and Outreach Initiatives Fair Housing Initiatives Program grants to the Greater Houston Fair Housing Center, North Texas Fair Housing Center, and the San Antonio Fair Housing Council for its Private Enforcement Initiative. This

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[59] U.S. Department of Housing and Urban Development Fair Housing Assistance Programs.

initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

If during the investigative, review, and legal process HUD finds that discrimination has occurred, the case will be heard as an administrative hearing within 120 days, unless either party prefers the case to be heard in Federal district court.

## Local, HUD-Funded Fair Housing Organizations

HUD provides various grants to organizations that work on fair housing issues. Fair housing organizations and other non-profits that receive funding through the Fair Housing Initiatives Program (FHIP) assist people who believe they have been victims of housing discrimination. FHIP organizations partner with HUD to help people identify government agencies that handle complaints of housing discrimination. They also conduct preliminary investigation of claims, including sending "testers" to properties suspected of practicing housing discrimination. In addition to funding organizations that provide direct assistance to individuals who feel they have been discriminated against while attempting to purchase or rent housing, FHIP also has initiatives that promote fair housing laws and equal housing opportunity awareness.

Visit this list of Fair Housing Assistance Program (FHAP) agencies in Texas, from HUD

Visit this list of Fair Housing Initiative Program (FHIP) agencies in Texas, from HUD

## Fair Housing Complaints and Trends

In order to search for and identify trends in fair housing, the State requested from HUD and the Texas Workforce Commission a comprehensive listing of all fair housing complaints in Texas from January 1, 2019, through December 7, 2023. The fair housing complaint data includes:

- all cases from the TWC-CRD, which is responsible for enforcing the FFHA in Texas;
- cases investigated by HUD that involve Texas properties, but include violations of federal statutes over which TWC-CRD or local FHAPs do not have jurisdiction (e.g., Section 504 of the Rehabilitation Act);
- cases available from the Department of Justice (DOJ), relating to a joint initiative with HUD; and
- cases handled by local FHAP organizations.

From January 1, 2019 through December 7, 2023, there were 2,670 Fair Housing Act complaints filed in the State of Texas. Of those, 1,646 (61.6%) of these complaints were handled by the Texas Workforce Commission's Civil Rights Division. Another 6.8% of complaints were handled by HUD directly. The remainder of complaints were handled by one of the five local FHAPs that were operating during that time period. Just over half of all complaints (52.2%) were closed with a "No Cause Determination." This is the term used for when a complaint does not meet the prima facie

requirements in order to state that discrimination occurred. A very small number (5.5%) were dismissed because the complainant could not be located or contacted, the complaint was not filed in a timely manner, the agency lacked jurisdiction, or the complainant failed to cooperate. Eleven percent (11.0%) of complaints were withdrawn by the complainant, either because the complaint was resolved before the conclusion of the investigation or withdrawn without any resolution. In 31.0% of all complaints, the agency was able to get the parties to settle or conciliate. Conciliation agreements are a way to resolve complaints somewhat informally by bringing all parties together to agree on an outcome that works for all groups involved. It saves time and money and is a legally binding agreement. In total, only 11 complaints were adjudicated beyond the conciliation agreement, requiring either judicial orders or court cases.

Of the complaints closed during this time period, some were filed before 2019. Most of these were complaints that were in court or awaiting judicial orders. More than 97% of complaints were originally filed in 2018 or later. This high percentage is to be expected, as any complaint closed in, for example, January 2019 would almost definitely be filed before that month. Complaints were closed fairly uniformly throughout the 5-year period, with 2021 being the notable exception, being the only year with fewer than 500 closures (468).

Breaking down the complaints by protected class or basis, 61.2% of complaints listed disability, 31.0% race, 9.1% sex, 7.8% national origin, 6.2% familial status. Religion and color combined made up less than 3% of cases. These percentages do add up to more than 100% because one complaint can have multiple bases. Complaints that mention retaliation made up 8.1% of complaints. Of note is the impact that President Biden's Executive Order 13988 and resulting HUD memorandum following the Bostock v. Clayton case. This order and memorandum implemented the finding from Bostock, clarifying that the protected class of sex included sexual orientation and gender identity. Since the beginning of 2019, only 34 complaints in Texas alleged housing discrimination based on sexual orientation or gender identity. However, only two of those complaints were adjudicated in favor of the complainant (this includes any outcome where there was a complaint withdrawn after resolution, successful conciliation, judicial consent order, or any other outcome where the complaint was not dismissed or otherwise found ineligible. Across all complaints, just under 38% are resolved in favor of the complainant.

In January of 2020, HUD released updated guidance on how to evaluate a reasonable accommodation request for an assistance animal. Perhaps because as a result of this guidance, there was a marked increase in the number of complaints regarding assistance animals. From 2019 through 2021, 199 complaints closed mentioned assistance animals, averaging 63 complaints per year. In 2022 and 2023, 213 complaints mentioning assistance animals were closed, averaging 106.5 per year, a 69% increase in annual complaints.

The most common issue alleged in a complaint was "Discriminatory terms, conditions, privileges, or services and facilities" (63.2%) followed by "Failure to make a reasonable accommodation" (48.5%) and then "Discriminatory refusal to rent" (34.4%).

One of the major reasons why conciliation is recommended as a first option for complaints that are not dismissed or determined to have no cause is that the process is shorter than litigation. Similar to the 2019 AI, there were very few examples of taking housing discrimination to court once a complaint is filed. In those cases, the length of time to close the complaint was between 800 and 1,000 days, well over two years. Meanwhile, conciliations had a mean length of time from filing to closing of 132 days, about 4.5 months. Additionally, half of all conciliated complaints were closed within 90 days. Out of all groups (local FHAPs, HUD, TWC-CRD), TWC-CRD had the lowest mean closure time and shortest amount of time within which 95% of its cases were closed.

## Complaints Made to TDHCA

In addition to HUD, DOJ, TWC-CRD and other FHAPs in the state of Texas, TDHCA also receives and investigates complaints. TDHCA's jurisdiction to handle complaints is limited to properties or programs that it monitors. However, sometimes complaints about TDHCA-monitored properties or programs include fair housing concerns. For these complaints, TDHCA can offer technical assistance to the residents or properties involved in the complaint, as well as refer complaints to the TWC-CRD through a Memorandum of Understanding (MOU) that exists between the two agencies.

Over the five-year period between January 2019 through October 2023, TDHCA received 5,134 total complaints, peaking in 2021 and 2023, likely generated in response to the opening and closing of the Texas Rent Relief Program, the ramp up of the Texas Utility Help program, and the closure of the Homeowner Assistance Fund. Both 2021 and 2023 saw nearly triple the complaints received in 2019 or 2020.

Almost 95% of complaints between January 2019 and October 2023 came in electronically. This stands in stark contrast to the time period analyzed in the 2019 AI when only 65% of complaints were filed electronically through either email or the complaint web form. While this would indicate that access to the internet has risen sharply over the last 5 years, there are still individuals who do not have internet access. In some cases, TDHCA staff may have entered a complaint using the web form for a caller as a reasonable accommodation, so this data may overestimate access to the internet. When looking at complaints that were entered by TDHCA staff, there were 175 complaints received by mail, 185 received by email, 67 received by fax, and 40 over the phone. Altogether this constitutes approximately 9% of all complaints received by TDHCA. However it is important to note that TDHCA received nearly seven times more complaints from 2019 through 2023 than it did from September 2016 through June 2018, but only received 1 hand mailed letter in the last five years alleging discrimination compared to 20 in the two years previously analyzed. TDHCA's continued acceptance of written, including hand-written, complaints makes information on fair housing issues and technical assistance more available to those who may not have ready access to information and resources regarding their rights and responsibilities. While the use of these methods has waned, TDHCA will continue to accept

complaints in written form. Staff are also instructed to take complaints via the phone as a reasonable accommodation for individuals who may not be able to use a computer, smart phone, or write due to a disability, or to assist with translation while filing a complaint.

It is important to note that during the 5-year period, TDHCA was the administrative agency for several high profile, high dollar pandemic relief programs, most notably the Texas Rent Relief Program, which distributed over two billion dollars to Texans in need of rental assistance, utility assistance, and eviction diversion. While TRR had its own complaint tracking system, TDHCA's main complaint system still received almost 900 complaints about the TRR program, 67 of which mention discrimination or disability issues. Of those TRR complaints claiming discrimination, staff identified only one complaint as possible discrimination during review. While a complaint may mention possible discrimination, TDHCA found no evidence of discrimination in complaints regarding TRR.

While TDHCA does have a fair housing team within the Housing Resource Center, most of complaints alleging discrimination were paired with some other issue or through another TDHCA program area. Similar to the findings from the 2019 AI, when removing the large influx of complaints about the Texas Rent Relief Program or complaints that did not list a program area, more than two thirds of fair housing related complaints came in as complaints related to some form of multifamily monitoring activity. Only 6% of complaints were specific to fair housing issues. For cases where TDHCA does not have jurisdiction, staff would give the complainant the information on how to file a fair housing complaint with TWC or referred the complaint to TWC directly in accordance with the two agencies' Memorandum of Understanding (MOU).

Because most complaints filed with TDHCA were related to programs administered by TDHCA, staff devised a methodology to determine if a complaint alleged discrimination and mentioned a protected class. If a complaint summary included the words "discrimination", "dog", "shower", "discrim", "aide", "caregiver", "parking", "transfer", or "grab bars" then the complaint is marked as mentioning an act prohibited under the Fair Housing Act. If the complaint summary included any of the words "disability", "disabled", "handicap", "race", "black", "white", "elderly", "senior", "latin", or "Spanish" then the complaint is coded as mentioning a protected class. Finally, if both a protected class and a prohibited act are present in the complaint summary, then it is coded as a complaint with possible discrimination. Staff then read through each of the 243 complaints that matched the search criteria previously mentioned and determined if the allegation of discrimination mentioned a protected class or if the mention of disability was related to a reasonable accommodation or modification. No judgment was made as to the legitimacy of the complaint, only if the allegation mentioned a discriminatory act based on a protected class. Of the 242 complaints, 141 mentioned a discriminatory act and claimed it was due to membership in a protected class.

TDHCA's complaints reveal additional details about the types of discrimination alleged. After the updated 2020 HUD guidance, Texans filed 7 complaints with TDHCA regarding assistance animals.

This trend is likely due to people still not being generally aware of assistance animal issues and the 2020 guidance, and is supported by TDHCA complaint data, which shows that assistance animal complaints have increased almost every year since 2019.

Complaints about live-in aides are only slightly more common than assistance animal complaints. From 2019 through October of 2023, TDHCA received fewer than 20 complaints mentioning reasonable accommodations surrounding live-in aides, and several of those were duplicate entries. Unlike in market rate housing, TDHCA may see higher overall rates of live-in aide complaints, as there are income limits and income certifications required in TDHCA-monitored properties that can complicate reasonable accommodations for live-in aides.

Requests for reasonable modifications for items like shower or tub conversions or installation of grab bars brought in 15 and 14 complaints respectively. Reasonable accommodations for transfers accounted for 16 complaints. The most common reasonable accommodation complaint received by TDHCA was related to parking. Over the 5-year period, 42 complaints mentioned parking as a reasonable accommodation. Please note, numbers provided in text may not add up to exactly 141. That is because some complaints may have mentioned more than one discriminatory act.

The most commonly mentioned protected class was disability, which accounted for 36 complaints that also mentioned a discriminatory act. The next most common was race with 20 followed by national origin with 5. Religion and color were not mentioned in any complaints that staff could identify that also mentioned a discriminatory act. Sex as a class was mentioned in only 1 complaint that staff could find, though 29 complaints mentioned "VAWA." Due to the low number of complaints and concerns about privacy and identification, staff did not conduct an analysis on these complaints. VAWA-related complaints may also not have mentioned discriminatory acts, but are often related to the protected class of sex, so are mentioned briefly here for context. Familial Status was not searched for, as opening the search parameters to include terms like "kids", "children", "minors", and "18" greatly increased the results. In checking those results, staff did not identify enough discriminatory acts based on familial status to continue searching those terms. For instance, "kid" was found in 223 complaints, "child" in 433, "minor" found in 29, and "18" found in 447 complaints. The vast majority of those complaints mentioning those terms are complaints about other children's behavior rather than complaints about discrimination based on a child being in the household.

As expected, complaints tended to come from metro areas rather than rural areas, and tended to cluster in the largest cities (San Antonio, Houston, Dallas, Fort Worth, Austin). One exception is El Paso, which only had one complaint that mentioned a protected class and a discriminatory act.

## Fair Housing Testing

No fair housing tests or audits were voluntarily submitted by FHIP or FHAP organizations to the State for the 2024 AI. However, TDHCA is aware of several complaints that were brought to TDHCA by the Fair Housing Council of Greater San Antonio (now the Fair Housing Council of South Texas) regarding reasonable accommodations and modifications. However, there were too few of these cases to perform analysis that would identify patterns.

## Summary of the State's Current Fair Housing Legal Status[60] [61]

- Rosas v. University of Texas at San Antonio and University of Texas at Austin, U.S. District Court, Western District of Texas, San Antonio Division, No. 5-18-cv-00536: Pro se plaintiff alleges violations of Title VIII of the Civil Rights Act, among other claims. On September 5, 2018, the defendants moved to dismiss the lawsuit for failing to state a claim upon which relief could be granted. The motion was granted by the district court on October 4, 2018. The Pro se plaintiff appealed the district court's dismissal of her claim to the United States Court of Appeals for the Fifth Circuit (Case No. 19-50515). On November 20, 2019, the U.S. Court of Appeals for the Fifth Circuit affirmed the district court's judgment. The Pro se plaintiff filed a motion to direct the Clerk of the Supreme Court of the United States to file a petition for writ of certiorari out of time but it was denied by the Supreme Court on May 18, 2020 (Case No. 19M137).

- Texas Workforce Commission Civil Rights Division v. Housing and Community Services Inc., et al 434th District Court, Bexar County, Texas: Plaintiff, Texas Workforce Commission-Civil Rights Division (TWC-CRD) filed a lawsuit on behalf of itself and Lasandra Dolberry against Defendants, Housing and Community Services, Inc., a Texas nonprofit corporation D/B/A Prospera housing Community Services, Melissa Huerta, Bonnie Salanda, Norma Arballo, Jose Mascorro, Casey Patton and Gilbert M. Piette (collectively "Defendants") on October 24, 2019, for violations of the Texas Fair Housing Act. Defendants filed an answer on November 14, 2019. A motion for Nonsuit in the case was filed and granted on March 31, 2021.

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[60] TDHCA attempted to collect data on all current Voluntary Compliance Agreements (VCAs) effective in the State of Texas. TDHCA submitted a FOIA request for this information on 12/7/2023, and as of 3/25/2024 still had not received this information from HUD. There may be current VCAs in effect in the State, but the information for this was not available.

[61] This summary of the State's current fair housing legal status was updated and recent as of January 23, 2024.

- Elevated Sober Living LLC et al v. City of Plano, Texas, U.S. District Court, Eastern District of Texas: On June 5, 2019, Plaintiffs filed their initial complaint against Defendant, alleging causes of action under the Fair Housing Act (FHA) including disparate treatment, disparate impact, and failure-to-accommodate based on theories of financial and therapeutic necessity. On August 27, 2021, the district court determined that Plaintiffs failed to prove their claims under a theory of financial necessity, but under the theory of therapeutic necessity, the district court held that the Defendant City violated the FHA for its failure to accommodate after concluding that Plaintiff's proposed accommodation was therapeutically necessary as compared to the offered alternative, considering the disabilities of the Plaintiff Property's residents. The Department of Justice (DOJ) filed a brief as amicus curiae in support of the plaintiffs on March 17, 2023. On November 20, 2023, the U.S. Court of Appeals for the Fifth Circuit vacated the district court's injunction, and remanded the case to the district court, holding that the district court erred in determining that the evidence satisfied the applicable legal standard. The case is pending in district court.

- Texas Workforce Commission-Civil Rights Division v. Vaman Investments LLC, 434th Judicial District Court, Fort Bend County, Texas: TWC-CRD alleges that an apartment complex owner violated the Texas Fair Housing Act by providing two prospective tenants conflicting information regarding rental terms and conditions. TWC-CRD brought this suit on behalf of a fair-housing organization that sent two individuals—an African-American tester and a Hispanic tester—to conduct rental testing at the complex within one hour of each other on the same day. During the testing, the complex's leasing agent gave less favorable information regarding the rate and availability of apartment units to the African-American tester compared to the Hispanic tester. The case went to trial on October 16, 2018, and the jury returned a verdict in favor of TWC-CRD. Defendant appealed the final judgment of the district court but before the appeal was heard the Defendant filed a motion to dismiss the appeal on August 12, 2019, and the appeal was dismissed on August 20, 2019.

- United States v. City of Arlington, Texas, U.S. District Court for the Northern District of Texas: On January 18, 2022, the court entered a consent order in United States v. City of Arlington (N.D. Tex.). The complaint, filed on January 13, 2022, alleged that the City of Arlington, Texas violated the Fair Housing Act (FHA) by discriminating on the basis of familial status when it blocked the development of an affordable housing project for families with children that had been proposed by a developer, Community Development, Inc. (CDI), and would have been financed using federal Low-Income Housing Tax Credits (LIHTC). The complaint alleged that the City refused to issue a Resolution of Support or a Resolution of No Objection to CDI because the City had a policy of supporting LIHTC developments only for new senior housing intended for persons 55 years of age or older. Under the consent order, the City will pay $395,000 in damages to CDI, maintain a non-

discrimination policy for future LIHTC developments, provide Fair Housing Act training to certain city officials, and submit to compliance and reporting requirements for three years. This case was referred to the Division after the Department of Housing and Urban Development (HUD) received a complaint, conducted an investigation, and issued a charge of discrimination.

- Aventurine One, LLC v. City of Marshall Texas, U.S. District Court for the Eastern District of Texas, Marshall Division: Plaintiff, Aventurine One, LLC ("Aventurine") filed a lawsuit against the City of Marshall, Texas ("City") alleging that the City had violated the Fair Housing Act. Aventurine proposed to the City a plan to revitalize the Blue Buckle building ("the site") by turning the historical building into affordable housing. Aventurine funded this project with housing tax credits allocated by TDHCA. Aventurine submitted an application to the City's Director of Community Development for a special use permit to approve the proposed development of multifamily housing. On March 11, 2023, the City's Planning and Zoning Commission ("Commission") held its meeting and public hearing to discuss the project and during the meeting the Commission initially denied the special use permit based on discriminatory objections to low-income housing that were voiced by the residents of the City who feared for their safety and the racial composition of the community as a result of the project. Aventurine requested reconsideration from the Commission and was denied. On August 28, 2023, TDHCA provided Aventurine with a Housing Tax Credit commitment, which must be executed after receiving proper zoning prior to September 27, 2023. Aventurine filed their lawsuit on September 29, 2023, because the City did nothing to approve the special use permit despite knowing that failure to do so would cause Aventurine to lose their housing tax credit allocation. On December 1, 2023, the City moved to dismiss the lawsuit. Aventurine filed a motion for extension to respond to the City's motion to dismiss on December 13, 2023, and the District Court granted the motion allowing Aventurine to file a response by December 21, 2023, with the City's reply to the motion being due by January 4, 2024.

## Fair Housing Discrimination Suits Filed by DOJ, and Resulting Consent Decrees

United States v. TFT Galveston Portfolio LTD and James Gartrell, Jr., U.S. District Court for the Southern District of Texas: On December 6, 2019, the court entered a consent decree in United States v. TFT Galveston Portfolio LTD and James Gartrell, Jr. (S.D. Tex.). This consent order resolves a pattern or practice case filed on February 21, 2019, alleging that the defendants discriminated on the basis of disability by designing and constructing an addition to the Seasons Resort property in Galveston, Texas without features of accessibility required by the Fair Housing Act and the Americans with Disabilities Act. Pursuant to the consent order, the defendants will remove steps to provide an accessible route through the property, build a new building containing 24 FHA compliant apartments, 8 of which will contain super-accessible features, and

construct a new accessible leasing office. The defendants will also provide a $75,000 fund to compensate aggrieved persons.

United States v. MA Partners 2, et al., U.S. District Court for the Northern District of Texas: On June 27, 2023, and August 10, 2023, the court entered consent orders in United States v. MA Partners 2, et al. (N.D. Tex.), a Fair Housing Act "election" case. The complaint, which was filed on February 22, 2023, alleged that the defendants discriminated on the basis of disability in violation of the Act by refusing to allow complainants, who received their SSI and SSDI payments around the third of every month, to pay their rent by the fifth of the month. The consent order entered on June 27, 2023, requires Defendants MA Partners 2, Brockbk JV LLC, Dallas Redevelopment Equities LLC, and Alden Short, Inc. to pay $10,000 in damages to the complainants, undergo fair housing training, adopt non-discrimination and reasonable accommodation policies, and submit periodic reports to the United States. The consent order entered on August 10, 2023, requires Defendant Sam Matalone to pay $1,000 in damages to the complainants and to undergo fair housing training. The case was referred after the U.S. Department of Housing and Urban Development (HUD) received a complaint, conducted an investigation, and issued a charge of discrimination.

## Fair Housing Discrimination Suits Filed by HUD, and Resulting Decisions

United States v. Quang Dangtran, Ha Nguyen, and HQD Enterprise, LLC, (HUDOHA No. 19-AF-0148-FH-015): On February 4, 2020, the Department of Housing and Urban Development Office of the Secretary issued a Secretarial Order. The Charge of Discrimination, which was filed on March 10, 2020, alleged that respondents, as landlords of the subject property, discriminated against complainant, who is black, by (1) posting a discriminatory housing advertisement, in violation of section 804(c) of the Fair Housing Act (FHA); (2) making a discriminatory statement, also in violation of section 804(c) of the FHA; and (3) refusing to negotiate a room rental with complainant because of her race, in violation of section 804(a) of the FHA. The ruling of Summary Judgement issued on October 24, 2019, the HUD Office of Hearings and Appeals (HUDOHA) ruled in favor of HUD's motion for partial summary judgment on its claim that respondents violated section 804(c), by posting discriminatory housing advertisement on Craigslist. On December 9, 2022, the HUDOHA issued an Initial Decision and Order that requires the respondents to pay the complainant $79,782.75 in damages; Respondent Dangtran to pay the Secretary of HUD $19,787 in civil money penalties; Respondent Nguyen to pay the Secretary of HUD $9,898 in civil money penalties; Respondent HQD Enterprise, LLC to pay the Secretary of HUD $19,787 in civil money penalties; Respondents Dangtran and Nguyen to attend FHA training and cultural sensitivity training; Respondents to implement a non-discrimination policy provided by HUD; and Respondents to pay $11,394.61 to HUD in attorneys' fees to compensate HUD for time spent addressing Respondents' multiple violations of their discovery obligations.

# Chapter 11 - Impediments to Fair Housing Choice

This chapter presents the "impediments to fair housing choice" identified in the research conducted while compiling this report. Research included the early outreach and consultation process outlined in Chapter 1 and then summarized in this chapter.  Research also includes the review of demographic characteristics and patterns which may influence housing choice captured in Chapter 2; the in-depth review of all 13 regions in Texas provided in Chapter 3; the review of state-level laws, regulations, and programs related to housing development and choice for protected classes summarized in Chapter 4; review of Prior and Current Actions in Chapter 5; an evaluation of the race and ethnicity of participants in the Department's programs and portfolio in Chapter 6; review of Pandemic Response in Chapter 7; the statewide and regional analysis of 2022 lending activity in Texas based on race, ethnicity, and sex through the use of HMDA data in Chapter 9; and a review of fair housing complaints and trends from 2019 to 2023, and legal cases related to Title VI violations and the Federal Fair Housing Act in Chapter 10. It should be noted that any discussion of impediments specifically related to disaster recovery would be found in Chapter 8.

This AI was conducted at the statewide level and includes a review of regional and county trends. Given the size of Texas, it was not feasible, nor within scope, to analyze impediments at the level of local individual jurisdictions. The State includes fair housing requirements and protections in all contracting language with local subrecipients and in program rules. The State recognizes the importance of local decision making and the authority of local jurisdictions to respond to housing needs and programs in their community. Participating Jurisdictions (PJs) - which are jurisdictions so designated by HUD that receive CDBG, HOME, ESG, or HOPWA funds directly from HUD - are required by HUD to complete an AI. The data available in this report may be utilized for local AIs, where appropriate.

## Background and Definitions

According to HUD's Fair Housing Planning Guide, "impediments to fair housing choice" are:

- "Actions, omissions or decisions *taken* because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choices or the availability of housing choices.
- Actions, omissions or decisions *which have the effect of* restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin." [emphasis added]

Further, there are three components of an impediment:

1. A fair housing impediment must be an identified matter that directly or indirectly (has the effect of) creating a barrier to fair housing choice.

2. An impediment must have a disproportionate effect on a protected class.
3. An impediment must be caused by an "action, omission or decision."

Through the comprehensive review noted above, some of the identified potential barriers or symptoms of barriers to housing choice could not be clearly linked to one or more protected classes or a particular action, omission, or decision. These potential barriers do not fall within HUD's definition of "impediment," but have been noted in this document.

Finally, it must be noted that the definition and description of "impediments to fair housing" in the HUD Fair Housing Planning Guide do not contemplate significant developments in the law since the Guide's publication. In particular, the Supreme Court's opinion in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015) (*ICP*), is controlling on the issue of sufficiency of statistical evidence to make a *prima facie* case of disparate impact discrimination under the Fair Housing Act. In ICP, the Court adopted a standard that requires the plaintiff identify a <u>particular facially neutral practice</u>, prove a <u>robust</u> <u>causal connection</u> between the identified practice and the claimed disparate impact, and demonstrate that the disparate impact <u>causes a barrier to housing</u>. *See ICP*, 135 S. Ct. at 2523. The information presented in this chapter is not sufficient to satisfy the ICP standard, and no practice or policy described in this section is being identified as creating a barrier to fair housing under the current U.S. Supreme Court standard. Accordingly, any statements regarding "impediments to fair housing choice" or "impediments," generally, within this Analysis of Impediments, are expressly denied as constituting a practice or policy that is the cause of discrimination under the Fair Housing Act.

## Fair Housing Input Gathered through Public Consultation

TDHCA hosted a preliminary consultation period, through which feedback was robust and varied. In many cases, specific issues were only reported in certain localities or regions, while some were identified by many groups statewide. In an effort to maximize the type of input received by participants in the consultation period, TDHCA created a google form that was disseminated to the general public, housing advocates and other interested stakeholders. The consultation form provided asked all participants to provide input on what the State of Texas should include or exclude in the 2024 Analysis to Impediments to Fair Housing Choice or to provide comment on topics they felt should be discussed in the document.

The input received in the consultations was insightful and informative to the development of the impediments identified in this AI. Please see Appendix G to review the actual comments received during the Early Consultation.  In summary input included:

- A need for increasing and improving fair housing awareness and education from multiple consultation commenters. There was a strong sense of agreement across the state that insufficient awareness and education about fair housing continues to be a

major barrier to fair housing protections. This input covered education and a lack of education and awareness regarding fair housing laws, rights, and duties available to the public, housing providers, and local governments.

- Concern that discrimination still may include source of income discrimination, land use restrictions, concentration of accessible housing, and "Not In My Back Yard" sentiments.

- There is an ongoing need for a variety of accessible, integrated housing units to meet the needs of people with disabilities, in addition to physical modifications, which may include access to affordable housing, and accessible transportation. The need for affordable housing was suggested to focus on both high-income, opportunity rich areas and areas defined by HUD as RECAPs, and also identified concern that disaster needs of renters was lacking.

- A common issue that arose across comments was the role that criminal history has on an individual's ability to find safe, affordable rental housing. Obstacles related to criminal history were noted in almost all early consultation comment. While criminal history is not a protected class, HUD has released guidance that an individual may have cause under the Fair Housing Act for actions related to criminal history.

## 2024 Impediments to Fair Housing Choice

Based on the research conducted in Chapters 2 through 10 and the results of the consultations noted above, statewide impediments to fair housing choice have been identified below. To the extent any impediments have been identified that are specific to disaster recovery activities and/or disaster-affected counties, those discussions would appear in Chapter 8.

The impediments are not provided in any particular order of priority and impediments are not intended to be compared against one another. Impediments listed affect protected classes differently. For example, the reasonable accommodation process serves persons with disabilities, not all protected classes. After each impediment the basis for that impediment is provided. Discussion of strategies and actions for mitigating these impediments is found in the Conclusions and Recommendations in Chapter 12.

Texas state agencies participating in HUD Community Planning and Development (CPD) programs have a limited role in causing—and eliminating—impediments to fair housing choice. Many of the trends identified in this research document were not the cause of a state level action, omission, or decision and moreover, are not something that is readily achievable given the limited available resources within CPD administrative funds, the constraints of working with those programs subject to the rule, and the limitations of the State's jurisdictional authority. However, the State acknowledges its role in affirmatively furthering fair housing choice for all Texans.

**Please see Appendix G for full Early Consultation submissions from commenters**.

## Impediment 1: Not in My Backyard Syndrome (NIMBYism) limits affordable housing development, which restricts housing choice for protected classes in some Texas communities.

NIMBYism is generally characterized by opposition to a proposed development from community members in close proximity to a site proposed for the development of affordable housing. Community members may support the idea of affordable housing, but oppose the specific location or construction of a specific development; or community members are not opposed to all developments or a specific development, but do not want specific populations of people in the development that they perceive to be undesirable for their neighborhood. NIMBYism could create fair housing impediments when exclusionary attitudes and actions have the effect of limiting housing opportunities for protected classes, even if actions and attitudes are directed primarily towards concerns over alleged issues like traffic, property values, and school overcrowding as opposed to overt discrimination against protected classes.

However, if those same issues (traffic, etc.) would not prevent a market rate property from being developed, then there should be limited mechanisms by which those issues should be able to prevent an affordable property from being developed. NIMBY groups can be very organized and well-resourced. Those presenting the NIMBY perspective can be very educated and savvy; they realize that they will be less effective if they focus on the root cause of their concern, and instead may present issues such as water drainage, school overcrowding, and emergency service availability as more primary causes for concern. Again, NIMBYism against the development of any multi-family development (market rate or affordable housing) may present identically.

Although NIMBYism is usually associated with the concerns and actions of community residents, the policies and practices of government entities can also be perceived as having a NIMBY effect. When local land use and zoning decisions are made that are responsive to local opposition and NIMBYism, they may perpetuate or support the NIMBYism effect and limit the creation of affordable housing stock in diverse areas. Laws which on the surface pose no inconsistency with fair housing laws can create such situations. Examples include state laws allowing for local zoning and land use planning and for the permitting of boarding houses. There is always the possibility when local bodies attempt to enact these laws and regulations, significant local testimony with concerns and attitudes from constituents may give the governmental bodies direction to act in a manner not fully consistent with fair housing.

**Basis for Identifying Impediment**

- Commenters noted that NIMBYism is a continuing barrier in proposed affordable housing.

- Commentors suggested that in many cities affordable elderly-only properties are placed in neighborhoods with higher incomes and that are predominantly White and Non-Hispanic. As opposed to affordable "family" or general properties, which are placed in lower income neighborhoods that were less White and Non-Hispanic.

  - Analysis by TDHCA of 9% applications from 2018-2022 using 2022 ACS data does indicate that census tracts with elderly only applications were more White and Non-Hispanic (average 45.3%), had higher median incomes ($63,061) and had lower poverty rates (14.4%) than census tracts with "family" or general applications (average 33.5% White Non Hispanic, $57,848 median income, and 17.5% poverty rates).

  - This preference for elderly housing may result in affordable housing developers feeling pressure to take the path of least resistance to avoid the opposition. The consequence of the preference for elderly deals is that ultimately less general population housing is developed. For households with larger family sizes and persons with disabilities needing accessible units, the challenge to find an affordable unit may be even more difficult.

- Texas Government Code Sec. 2306.67071 empowers local governments to effectively "veto" a Low Income Housing Tax Credit (LIHTC) or Multifamily Bond application by simply choosing to not hold a hearing, which must be held in order for a LIHTC application to be submitted in accordance with both Texas Government Code Sec. 2306.67071 and Texas Administrative Code Title 10 Part 1 Chapter 11 Section 11.204(4). A LITHC application without a county or municipal hearing is rendered ineligible. This gives residents in choice neighborhoods the ability to effectively keep LIHTC and Bond applications from even being able to compete.

- Texas Government Code Sec. 2306 requires TDHCA to notify interested neighborhood groups which could provide NIMBY opposition. NIMBYism can be expressed through homeowner associations' rules and regulations that may have policies concerning unsupervised children, parking restrictions, and other rules that may conflict with fair housing laws.

- Applications for funding from the Department or other entities often require applicants to notify local and state officials and nearby neighborhoods, and may have points or award incentives for support from such officials and organizations. Constituents who are opposed to such developments have this additional avenue to contest the development through submission of opposition letters or the absence of letters of support.

- NIMBYism could lead to subtle patterns in otherwise lawful zoning. Hypothetically, over time, a city may adopt a series of small changes to zoning laws, such as lot size minimum

restrictions on new construction, square footage minimums on new construction, unit size restrictions in new rental construction, and room size minimums in rental units. Individually, each of these zoning changes would seem innocuous. But taken as a whole, the only housing units that could be built within those limitations are houses on large lots with large room sizes that lower income families may not be able to afford. Broad-based opposition to affordable housing may be expressed in terms of concerns over crime, property values, school overcrowding, and traffic. However, those same concerns could pose obstacles to the creation of affordable housing opportunities, including opportunities for persons in protected classes.

- Analysis from Chapter 2, Statewide Overview of Demographics and Economic Conditions shows that there are not enough ELI units to meet the number of ELI households that need units.

- Analysis from Chapter 2, Statewide Overview of Demographics and Economic Conditions shows that there are not enough ELI units to meet the number of ELI households that need units.

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

This impediment recognizes the perception that there has been, and continues to be, a lack of general public understanding and awareness about fair housing laws, rights and responsibilities. This is an issue the State has worked intensively on as reflected in the summary of actions taken in Chapter 4; however, the need to continue educational efforts has not diminished. A lack of understanding and awareness of fair housing law, rights, and duties can create an impediment when housing providers lack the knowledge needed to adequately respond to the needs of those requesting reasonable accommodations, or when housing consumers lack sufficient information to know and protect their rights

These educational needs are of two types:

- Those offering housing should fully understand their obligations; and

- Those seeking housing should be able to fully understand their rights and means of pursuing action if they believe their rights have been violated.

**Basis for Identifying Impediment**

- Commenters suggested there is a need for continuing education on more recent HUD rules and guidance.

- Multiple commenters cited the need for more renter's rights information to help tenants.

- Feedback was received on the need for education and training around assistance animals, service animals, and emotional support animals, specifically related to the Fair Housing Act and HUD guidance.

- There is a need for both property and tenant education as it relates to the Violence against Women Act of 2022 and enhanced understanding of the protections it offers.

- There was a limited presence of fair housing testing in parts of the state outside of local Fair Housing Initiatives Program (FHIP) and Fair Housing Assistance Program (FHAP) service areas. Testing is one of the best methods to track and affect fair housing discrimination; however, it is difficult to conduct fair housing testing in rural parts of the state without a local FHIP or FHAP provider.

- Additional education is needed on how to assist persons with Limited English Proficiency (LEP); someone who is not able to speak, read, write, or understand the English language at a level that allows them to access programs effectively. In Texas, the most prevalent LEP population is Spanish speakers. These individuals may experience obstacles to access housing choice due to language barriers associated with national origin.

- There are challenges in ensuring that properties understand the reasonable accommodation and modification processes, and that tenants know their rights and protections as it relates to accommodations and modifications. This challenge is reflected across Texas, as the Texas Workforce Commission's Civil Rights Division (TWC-CRD) reports that the majority of fair housing complaints involve the protected class of persons with disabilities. This is also consistent with national trends. Advocates for the homeless felt that training for shelter staff on reasonable accommodations needed to include access shelters and multiple commenters emphasized the need for behavioral health disabilities to be addressed. This training needs to include topics such as retaliation and intimidation by properties after the filing of a fair housing complaint.

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

Across Texas, there were approximately 630,000 applications for new loans for home purchase in 2022. Of those, nearly 65,000 applications were denied by the lending institution. Not all of the remaining applications resulted in a loan origination; in all, a total of nearly 365,000 loans were originated. This would indicate that more than one in 100 Texans, regardless of age or other

demographics, secured a mortgage to purchase a home. Nationally[62], as well as in Texas, minority applicants face higher rates of denial for home mortgage loans, and this discrepancy persisted between the writing of the 2019 AI and the 2024 AI.

Credit history and credit worthiness are critical pieces of one's ability to access homeownership and lending products, and even a household's ability to secure a rental unit. Numerous stakeholders input on the need for financial literacy education to improve credit ratings for households seeking lending products. In addition, feedback was received on the obstacles renters with no or poor credit history and no or poor rental history face. Lenders traditionally respond to higher risk loans by charging higher interest rates and/or requiring more collateral. The 2022 HMDA dataset does not include information on credit worthiness to gauge risk to lenders and potential fair housing discrimination. Given the current limitations on reporting requirements, it is not possible to determine whether borrowers with similar credit risk were treated equally.

If protected classes have unequal access to lending products and/or are provided with loans at high interest rates more frequently than other applicants with similar risk profiles, such practices could limit immediate housing choices by preventing individuals from purchasing homes, potentially affecting their mobility and freedom of housing choice; charging more for homes; and/or putting persons at greater risk for foreclosure. This could also contribute to wealth gaps between protected classes and those not in protected classes as homeownership typically functions as a means to accumulate wealth. This issue may also be compounded in Texas for immigrant populations whose language and cultural barriers may create unique challenges.

**TDHCA Basis for Identifying Impediment**

- Debt-to-income ratio and credit history were the most common reasons noted for denial. The 2022 HMDA dataset does not include information on credit worthiness to gauge risk to lenders and potential fair housing discrimination. Analysis conducted in Section 9 of the AI noted different loan denial rates for mortgage applicants by race.
- Hispanic or Latino persons represent 40% of the Texas population, but compose 31% of home loan applicants; and Black or African Americans represent 12% of the state population, but only 11% of loan applicants.
- African American applicants were denied home loans at higher rates than their White and Asian counterparts, even when controlling for income.

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[62] What Different Denial Rates Can Tell Us about Racial Disparities in the Mortgage Market. Urban Institute, January 13, 2022. https://www.urban.org/urban-wire/what-different-denial-rates-can-tell-us-about-racial-disparities-mortgage-market

- Commenters noted that lenders in border areas are allegedly targeting immigrant families with excessively high interest loans; that persons with LEP, who may fall under the protected class of national origin or race, may experience language barriers that further challenge accessing traditional credit products; and that there is a lack of lending products for accessibility modifications for persons with disabilities.

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

The limited availability of accessible and visitable housing stock for persons with disabilities was a common theme expressed throughout the public consultation process. There are more than 3 million Texans with a disability[50], and a significant number of persons with disabilities have extreme housing needs. Persons with disabilities face challenges finding housing that is affordable, accessible, and located near transit and supportive services. This is both a challenge in terms of the scarcity and location of accessible housing stock and the location of accessible housing integrated into the community with close proximity to medical and social services.

**Basis for Identifying Impediment**

- Commenters noted that the biggest need is for housing units for extremely low income tenants at 30% or below AMI.
- Commenter noted the importance of locating accessible units near supportive services, and ability to access those services.
- Comments were made regarding the need for more low income housing in high opportunity areas.
- Commenters suggested that there is a need for a variety of accessible, integrated housing units to meet the needs of people with disabilities.
- Rural Texas faces unique challenges in fulfilling accessible housing and service needs because service providers may be located far from accessible housing. Stakeholders expressed the need for accessible housing to be both integrated and dispersed throughout the community.
- Chapter 6, Program and Portfolio Analysis, reported that just over 9% of units in TDHCA's portfolio of active properties are accessible for either mobility or hearing/visual impairments. While this exceeds what has been the federal and state requirement, it does not mean that sufficient accessible housing is available. Further it concentrates accessible housing into the HTC program.
- The greatest need for accessible units is for units affordable to households in the ELI and VLI income categories. National and State level Census data indicate that persons with a disability are more likely to live in poverty than persons without a disability. The 2018-2022 ACS data show that 18.1% of individuals who live below the poverty level in

Texas have a disability, while 8.6% of individuals who live at or above the poverty level have a disability.[63]

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

Many difficulties in obtaining housing do not fit neatly into the impediments thus far identified. The State has included these obstacles as a fifth impediment. These hurdles were identified through outreach and consultation or were found in the data analysis presented in previous chapters.

**Basis for Identifying Impediment**

- Commenters suggested that the State of Texas needs to review laws and guidance pertaining to inequitable tenant criminal history requirements.
- Commenters noted that supportive housing providers should have the freedom to provide housing without additional restriction on residents' past.
  - It is worth noting that persons experiencing and at-risk of experiencing homelessness are targeted populations for Supportive Housing under the QAP, and multiple provisions in the QAP incentivize providing housing for this population.
- Commenters noted that formerly incarcerated people are more than 10 times more likely to be unhoused than the general public.
- Commenter noted the importance of locating accessible units near supportive services, and ability to access those services.
- A significant portion of individuals with criminal records are members of one or more protected classes. HUD has indicated in guidance[64] that criminal history has sufficient ties to race and disability and that there may be good cause for a fair housing case related to criminal history, on a case by case basis. Criminal history that limits access to housing further compounds the challenges of reentry and may reduce success rates and increase recidivism.
- There is a lack of larger housing units, specifically in the State's rental housing portfolio to accommodate larger families. These larger housing units are most in need

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[63] American Community Survey Table B23024, 2022 5-Year Data.

[64] Secretary Marcia L. Fudge, U.S. Department of Housing and Urban Development. April 12, 2022. https://www.hud.gov/sites/dfiles/Main/documents/Memo_on_Criminal_Records.pdf

in Regions 11 and 13 where the average household size and average family household size are well above the state average. In Texas 93.9% of all units have 3 or fewer bedrooms, only 64.7% of owner households have 3 or fewer. Only 7.1% of rental units have 4 or more bedrooms, 35.3% of owner units have 4 or more bedrooms.
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- One of the challenges faced by the State is finding the balance of programming housing funds in ways that allows for ongoing preservation of existing affordable housing at risk of losing its affordability and/or in gentrifying areas, while also allowing for location of affordable units in areas considered High Opportunity. The State expects to pursue both avenues.
- Fair housing issues can impact rural communities in different ways than in urban ones. For example, conversations about what neighborhoods are optimal for new lower income housing are less meaningful when a community is losing population overall, and rehabilitation of existing housing may be more significant.
- There are limited data to help identify housing needs in rural Texas. Census data for small populations do not provide high confidence levels and cannot be used alone to reliably address fair housing choices. Rural areas pose unique challenges to performing demographic analysis. Census blocks range in size anywhere from 600 to 3,000 people. In rural areas Census blocks may cover an entire county. For example, Loving County is an entire Census block. The racial data for this county will not provide substantive analysis based on geographic distribution. Substantive analysis is not possible when Census tracts or blocks become geographically too large and the data too limited.
- In rural communities, a lack of access to high speed internet connections may limit residents' employment and educational opportunities. Slower internet speeds may also limit community solutions such as telemedicine options that might otherwise address a shortage of medical services. Although some rural communities request CDBG funding from TDA to address internet access concerns, federal program requirements limit the effective use of CDBG funding to address this issue. Providing broadband service to a large facility such as a hospital or major employer as an economic development activity is a promising opportunity for CDBG.
- Communities that are eligible for funds from the CDBG colonia set-aside or Self Help Centers must be located within 150 miles of the Texas-Mexico border, however other communities provided input that they face similar issues. Unincorporated communities in East Texas may also suffer from a lack of basic infrastructure and substandard housing; these communities can apply for various CDBG-funded programs, but are not eligible for the colonia set-aside.

**Impediment 6: Unexpected or otherwise unpredictable events or economic shocks, and resulting economic disruptions, have an outsized impact on certain protected groups or class members.**

**TDHCA Basis for Identifying Impediment through Analysis**

- A review of TDHCA pandemic programs revealed that minority households, particularly Black households and persons with disabilities, were more vulnerable to the effects of the pandemic recession, with minority households representing a disproportionate share of both applicants and recipients in the Texas Rent Relief Program (TRR) and Homeowner Assistance Fund Program (HAF).
- Future economic disruptions may not provide the same type or level of federal resources or moratoria to assist households.
- A brief review of previous economic disruptions, such as the 2008 subprime lending crisis reveals that Black and Hispanic households, along with workers in service industries, experience significantly higher unemployment rates and those unemployment rates increase disproportionately when economic disruptive events occur.

## Conclusion for Impediments

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

# Chapter 12 - Conclusions and Recommendations

This section of the Analysis of Impediments to Fair Housing Choice (AI) provides the culmination of all prior chapters. The earlier chapters each fed into the development of the six impediments outlined in Chapter 11: Impediments to Fair Housing Choice. This chapter then provides what the State recommends for action, with the exception of issues related to disaster recovery. All issues related to disaster recovery are presented together in Chapter 8.

## Context and Limitations

Previous State AI's covered what the State, local government, and other organizations could do to mitigate impediments. This AI is focused on the actions that can be performed by the State toward addressing the impediments identified in Chapter 10.

Texas state agencies participating in U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) programs have a limited role in causing—and eliminating—impediments to fair housing choice. Many of the trends identified in this document were not the cause of a CPD recipient agency's action, omission, or decision, and are not something within the control or authority of the state agencies receiving HUD CPD funds. However, the State acknowledges that it has a role in affirmatively furthering fair housing choice for all Texans.

The Texas Department of Housing and Community Affairs (TDHCA), for example, only has the authority to oversee properties that are part of its portfolio. TDHCA cannot enforce its rules on housing providers that do not participate in TDHCA's programs. However, even when a provider does participate in a TDHCA program, TDHCA does not have the power to enforce the Fair Housing Act, as this responsibility lies with the Texas Workforce Commission's Civil Rights Division (TWC-CRD).

The responsibility to affirmatively further fair housing and to increase fair housing choice are shared by TDHCA, the Texas Department of Agriculture (TDA), the Texas General Land Office (GLO), and the Texas Department of State Health Services (DSHS). Specifically, 42 US Code Chapter 45 §3608(d) states "All executive departments and agencies shall administer their programs and activities relating to housing and urban development (including any Federal agency having regulatory or supervisory authority over financial institutions) in a manner affirmatively to further the purposes of this subchapter and shall cooperate with the Secretary to further such purposes." Each of these agencies also have jurisdictional restrictions. The GLO, for instance, receives disaster recovery funds, which are only useable in disaster recovery areas, while DSHS only administers the Housing Opportunities for Persons with AIDS (HOPWA) Program. While the duty to affirmatively further fair housing may be limited, the prohibitions on discrimination do not have such limitations.

The State's HUD CPD funds administered through these agencies are not sufficient, nor required, to address AFFH on behalf of the large number of local and regional jurisdictions that also receive HUD CPD funds, each of which administers their own programs. For these reasons, the State will focus solely on recommendations that are within its ability and authority to act upon. These recommendations will fall broadly into two categories: actions to combat the effects of historical housing discrimination (affirmatively furthering fair housing), actions to remediate ongoing housing discrimination, and increase the amount of information available to low-income Texans about their rights and access to affordable housing programs.

## Impediments[65]

1 Not in My Backyard Syndrome (NIMBYism) limits affordable housing development, which restricts housing choice for protected classes in some Texas communities.

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

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

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

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

6: Unexpected or otherwise unpredictable events or economic shocks, and resulting economic disruptions, have an outsized impact on certain protected groups or class members.

## Recommendations and Proposed Actions

This document is not an attempt for the State to undertake all possibilities relating to actions that could address fair housing, but to offer specific, measurable, actionable, reasonable, and time-

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[65] See the discussion in the Impediments to Fair Housing Ch. 11 regarding the use of this term in relation to the Fair Housing Act.

bound goals to address the identified impediments that are likely to be achievable within current resource constraints.

As became evident in the discussion of the impediments, there is overlap among impediments; as such there should be overlap and interplay among the actions to address those impediments. As the impediments faced by the State of Texas have remained largely unchanged over the last five years, much of the recommended proposed actions will also be the same.

## Recommended Actions to Combat the Effects of Historical Housing Discrimination

- Promotion of new construction or rehabilitation in urban core areas with attributes that would indicate displacement is occurring for historically low-income households in the community. QAP rules could contemplate identification of neighborhoods at risk of displacement/gentrification by using statistical metrics (one example would be those found in the University of Texas Uprooted study).
- TDHCA and other state agencies can attempt to mitigate displacement, and provide a broader spectrum of choice, by seeking to program multifamily housing funds for preservation of properties at risk of losing affordability, with a priority made for properties for which there is evidence that rents – if not subsidized – would increase significantly.
- Investing funds in the rehabilitation and redevelopment of smaller multifamily properties. For example, smaller developments already embedded in a community may be able to provide affordable, small-scale options in urban areas while allowing for reinvestment to be spread across an area through multiple smaller developments instead of one large, new construction property.
- Continue to promote giving assistance to rural developments, many funded long ago by USDA, so that they can rehabilitate and prevent older affordable rural properties from becoming obsolete.
- Continue to make efforts to also drive multifamily housing funds into high opportunity areas.
- In areas that may not be gentrifying but are still seeing rapid demographic shifts, such as more rural areas, encourage TDA CDBG funds and GLO disaster funds to be used for housing rehabilitation. Frequently, communities that apply for housing rehabilitation projects prioritize units for elderly and/or disabled persons, which may include ramps and other accessibility improvements. In 2015, TDA expanded the CDBG housing rehabilitation opportunities; in addition to the traditional owner-occupied units, the program began allowing rehabilitation of non-profit owned single-family housing units

and multifamily structures with up to four units. This rehabilitation can include basic construction and/or improvements for accessibility.

- Prioritize and encourage that HUD CPD funded properties be located on sites that promote transportation options, public transit, location of social services, and access to medical and educational services.

- As needed, the State expects to continue to seek out waivers and exceptions to exceed Fair Market Rents for its HOPWA, HOME Tenant Based Rental Assistance (TBRA), and ESG programs to improve tenant choice and improve the likelihood of finding decent, safe, accessible units in a variety of geographically dispersed areas with their assistance.

- Research and assess criminal background screenings being used at properties that TDHCA monitors and/or research successful background screen strategies in use in other states.

- Recently built, TDHCA-monitored affordable housing properties are modern, aesthetically and architecturally unique, and often located in high opportunity areas. Using these sorts of properties as an example: State agencies can continue to provide education on often inaccurate conceptions regarding affordable housing. When neighborhoods no longer perceive affordable housing as undesirable, they are less likely to object to affordable housing being situated nearby.

- Investigate requirements for identification of remediation plans addressing histories of lead paint, insect or rodent infestations, for LIHTC applications for rehabilitation or adaptive reuse.

- Research offering a multifamily affirmative marketing tool to be available for properties in identifying least likely to apply populations more accurately and in streamlining the process of creating an affirmative marketing plan.

-  Consider a requirement for properties that apply for funding for rehabilitation to notify current tenants of the application.

## Recommended Actions to Remediate Ongoing Housing Discrimination

- Propose during the QAP development process an increase to the amount of accessible housing by requiring that new TDHCA-monitored senior/elderly limitation housing have increased set asides of units with accessible features through consideration in NOFAs or scoring incentives in the QAP.   For example, a policy could provide points if a property increases the minimums from 5% of units with mobility accessibility features and 2% of units with auditory and visual accessibility features to 10% mobility features and 4% auditory or visual features. This would bring the number of units with accessible features closer in line with the percentage of those 55+ that have these types of disabilities.

- Funding for construction and rehabilitation – single or multifamily -- could be programmed to promote accessibility and visitability. Several eligible CDBG and HOME Investment Partnerships Program (HOME) activities can address barriers that may affect Texans with disabilities. Additionally, state general revenue funding can be used to bolster

those federal sources. Infrastructure and public facility access can be critical to a person's ability to fully participate in the community. Rehabilitation of sidewalks, for example, is an eligible CDBG activity that can allow persons with mobility disabilities to better access businesses and resources in the community. Sidewalk improvements are the main activity for the Downtown Revitalization/Main Street Program, a small but highly popular category of TDA CDBG funding. In addition, TDA's Community Development Fund can be used to make accessibility improvements to city halls, county courthouses, and other important community facilities. TDHCA uses its funds to allow additional accessibility modifications when purchasing or rehabilitating a home with HOME funds. Carrying the theme of accessibility through all HUD CPD programming will help increase the supply of accessible affordable housing dispersed throughout the community.

- Re-consider rules that may limit creative use of funding for homeownership and provide for opportunities for special case exceptions in underwriting or manual underwriting. Manufactured and alternative housing options, such as tiny homes, are not commonly considered in the pool of affordable housing stock outside of disaster response. To expand the possible options for those with low incomes, TDHCA expects to further evaluate its rules to identify revisions that may increase the opportunity to pursue non-traditional housing options across the state, within federal limitations.

- The state agencies should continue to improve their relationship with Texas Health and Human Service (HHS) agencies and service providers to maximize opportunities for collaboration and the leveraging of resources, such as continuing to look for opportunities similar to the Section 811 PRA Program or Project Access Program, in which choice is greatly expanded for certain populations of persons with disabilities through inter-agency collaboration. Ongoing, active engagement of a housing and community development presence at behavioral health task forces and work groups will help keep dialogue open and promote creative solutions.

- Assess the impact of reducing the array of services provided to tenants for which the property can receive points, in the QAP while focusing on driving higher quality and more impactful services instead. Advocacy groups can become an important part of providing meaningful services like child care in LIHTC properties.

- Regularly reevaluate the programming of homeownership funds and consider shifting funds toward construction of additional affordable multifamily units if warranted.

- Investigate whether federal or private funds are available to provide fair housing testing and/or research funds to promote greater enforcement of fair housing in rural areas not covered by Fair Housing Initiatives Program and Fair Housing Assistance Program organizations to gather more information on the extent and nature of discrimination. TDHCA has received two FHEOI grants from HUD and should continue to seek out these opportunities.

- Research how TDHCA single family programs could incorporate non-traditional housing options, such as accessory dwelling units (ADU).

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- Research utilizing mapping software, similar to that used in this document, to publish TDHCA's Section 8 payment standards.
- Investigate methods to increase the number of Extremely Low Income units available.

## Recommended Actions to Increase the Amount of Information Available to Low-Income Texans about Their Rights and Access to Affordable Housing Programs

- Propose to update the Tenants Rights and Resources Guide to include information on how to sign up to TDHCA mailing lists.
- Investigate opportunities to partner with state research universities to to assess the impacts and trends of the State's multifamily programs, including options to regularly survey tenants in TDHCA monitored properties.
- Continue to provide frequent trainings for single family and multifamily housing developers and property managers and ensure agency staff that work with HUD CPD programs are familiar with the most current fair housing training resources. While TDHCA specifically has focused on increasing training quality and frequency, including by seeking out HUD grants to produce webinars and video trainings, there is still a need for more information. Focus trainings on handling accessibility modification requests and reasonable accommodations, updated or revised guidance from HUD, and best practices in tenant selection.
- Seek to expand the property management outreach process for training and informational materials to market rate and privately owned properties through social media and collaborations with trade and advocacy associations. TDHCA may seek to expand the reach of its training opportunities by improving advertising on more platforms, including the websites of other state agencies and related organizations.
- Seek out opportunities for the State to educate and inform local officials, community leaders, and neighborhood organizations on NIMBYism and fair housing. Opportunities to present on best practices, rights, and responsibilities of fair housing might include conferences and events (American Planning Association, Texas Municipal League, etc.) or fairs and expos (Texas State Fair).
- The State will continue to seek additional guidance as needed from HUD on matters of fair housing.
- Empower tenants and those who assist them by providing and promoting trainings to nonprofit and advocacy organizations, tenant protection organizations, housing counselors and navigators, and local health authority staff and caseworkers on fair housing and protected classes, retaliation, VAWA protections, and, for those with disabilities, how to assist their clients with navigating requests for reasonable accommodations and modifications. Currently, TDHCA provides such trainings annually and on request. TDHCA can expand upon this particular action through informing other

agencies of these training opportunities with Texas HHS, TDA, GLO, and TWC. Further, TDHCA can update its Tenant's Rights and Resources Guide to direct prospective and current tenants to these training resources.

- Empower low-income homebuyers by providing and promoting trainings to nonprofit and realtor groups who work with low income households on TDHCA homeownership programs and on fair housing in sales and lending. TDHCA HRC staff can liaise with such organizations to determine areas of opportunity or gaps in information.
- Agencies that currently provide credit counseling can also provide more targeted outreach and information for consumers in any of their programs about credit and its implications on both rental and homebuyer opportunities. TDHCA can identify areas of the state, if any, where there is a shortage of HUD certified Housing Counseling organizations.
- To ensure a focus on the unique conditions and challenges in border regions and in colonias, utilize CDBG funds and TDHCA's Self-Help Centers to improve resident awareness of fair housing rights and protections for renters, and fair lending protections for those seeking homeownership.
- Target specific opportunities for training, outreach, and collaboration with state housing partners. The Texas Association of Realtors (TAR), for example, represents agents, brokers, and apartment locators. If TAR's members are more aware of the State's available programs and participating properties it may help provide those seeking housing with a knowledgeable apartment locator or realtor. Real estate agents that are aware of programs like the Texas Bootstrap Loan and Amy Young Barrier Removal (AYBR) programs would be able to assist their clients with the potential to pair these programs with a house that may not be accessible currently, but could be by utilizing AYBR or HOME funding.
- The State currently licenses and regulates real estate agents and brokers through the Texas Real Estate Commission (TREC). By expanding inter-agency relationships with TREC and informing it of the State's HUD CPD programs and affordable housing opportunities, it should be possible to boost the number of licensed real estate professionals who are aware of State programs that may be available to their clientele.

## Conclusion

The 2024 State of Texas Analysis of Impediments to Fair Housing Choice works from the guiding principle of seeking to identify impediments to fair housing choice and identify specific actionable steps that can be taken by the state to effect meaningful changes aimed at mitigating the barriers to fair housing choice. To this end, the State engaged in an analysis of statewide, regional, and local data points to identify possible instances of impediments facing protected classes. This was coupled with extensive outreach to the public and stakeholders, as well as targeted outreach to specific subpopulations and groups.

After looking at the 2019 AI, the State took an inventory of the actions it had taken to mitigate the identified impediments since 2019. By combining the data analysis and public consultation with the work from the 2019 AI and a review of current Texas statute and administrative code, the State identified six impediments to fair housing choice facing protected classes.

The State has focused its efforts on those avenues where state agencies receiving HUD CPD funds could act within their authority and with their HUD CPD resources. Additionally, the AI contemplates actions that could be taken by the State beyond just the use of CPD funds. Finally, once these impediments were identified, the state agencies receiving HUD CPD funds developed recommendations for ways to use their current funds to alleviate these obstacles.

# Appendix A - Commonly Used Acronyms

| Acronym | Meaning |
|---|---|
| AA | Administrative Agency |
| ACS | American Community Survey |
| AFFH | Affirmatively Furthering Fair Housing |
| AFH | Assessment of Fair Housing |
| AI | Analysis of Impediments |
| AMFI | Area Median Family Income |
| AMI | Area Median Income |
| ARP | American Rescue Plan |
| AYBR | Amy Young Barrier Removal Program |
| BHAC | Behavioral Health Advisory Committee |
| Bootstrap | Texas Bootstrap Loan Program |
| CAA | Community Action Agency |
| CDBG | Community Development Block Grant |
| CFD | Contract for Deed |
| CFPB | Consumer Financial Protection Bureau |
| CHAS | Comprehensive Housing Affordability Strategy |
| CHDO | Community Housing Development Organization |
| CoC | Continuum of Care |
| CPD | Community Planning and Development |
| DAW | Disability Advisory Workgroup |
| DR | Disaster Recovery |
| DSHS | Department of State Health Services |
| ELI | Extremely Low Income |
| EPI | Texas HIV Epidemiological Profile |
| ESG | Emergency Solutions Grant |
| FBHA | Facility Based Housing Assistance |
| FHAA | Fair Housing Act Amendments of 1988 |
| FHAP | Fair Housing Assistance Program |
| FHDMR | Fair Housing, Data Management, and Reporting |
| FHIP | Fair Housing Initiatives Program |
| FMR | Fair Market Rent |
| FVA | Fund for Veterans' Assistance |
| GLO | General Land Office |

| Acronym | Meaning |
|---------|---------|
| HAF | Homeowner Assistance Fund |
| HBA | Homebuyer Assistance |
| HCV | Housing Choice Voucher |
| HHS | Health and Human Services |
| HHSC | Texas Health and Human Services Commission |
| HHSCC | Housing and Health Services Coordinating Council |
| HOME | HOME Investment Partnerships Program |
| HOPA | Housing for Older Persons Act |
| HOPWA | Housing Opportunities for Persons with HIV/AIDS |
| HRA | Homeowner Rehabilitation Assistance |
| HSDA | HIV Service Delivery Area |
| HTC | Housing Tax Credit Program |
| HUD | United States Department of Housing and Urban Development |
| ICP | Inclusive Communities Project, Inc. |
| IDD | Intellectual and Developmental Disabilities |
| LEP | Limited English Proficiency |
| LI | Low Income |
| LIHTC | Low Income Housing Tax Credit Program |
| LMHA | Local Mental Health Authority |
| LMISD | Low and Moderate Income Summary Data |
| MF Bond | Multifamily Bond Program |
| MFDL | Multifamily Direct Loan Program |
| MFTH | My First Texas Home Program |
| MI | Middle Income |
| MSA | Metropolitan Statistical Area |
| NHTF | National Housing Trust Fund |
| NIMBY | Not in My Back Yard |
| PATH | Projects for Assistance in Transition from Homelessness |
| PHA | Public Housing Authority |
| PHP | Permanent Housing Placement |
| PJ | Participating Jurisdiction |
| PLWH | Persons Living with HIV |
| PRA | Project Rental Assistance |
| QAP | Qualified Allocation Plan |
| RFP | Request for Proposals |

| Acronym | Meaning |
|---------|---------|
| SAFMR | Small Area Fair Market Rent |
| SFD | Single Family Development |
| SHC | Colonia Self Help Center |
| SHTF | Texas State Housing Trust Fund |
| SLRTP | Statewide Long Range Transportation Plan |
| SSDI | Social Security Disability Insurance |
| SSI | Social Security Insurance |
| STIP | Statewide Transportation Improvement Plan |
| STRMU | Short Term Rent, Mortgage, and Utility |
| STSH | Short Term Supportive Housing |
| TAA | Texas Apartment Association |
| TAAHP | Texas Affiliation of Affordable Housing Providers |
| TAC | Texas Administrative Code |
| TAR | Texas Association of Realtors |
| TBAE | Texas Board of Architectural Examiners |
| TBRA | Tenant Based Rental Assistance |
| TDA | Texas Department of Agriculture |
| TDC | Texas Demographic Center |
| TDHCA | Texas Department of Housing and Community Affairs |
| TDLR | Texas Department of Licensing and Registration |
| TICH | Texas Interagency Council for the Homeless |
| TML | Texas Municipal League |
| TREC | Texas Real Estate Commission |
| TRR | Texas Rent Relief |
| TSH | Transitional Supportive Housing |
| TTY | Text Telephone |
| TVC | Texas Veterans Commission |
| TWC | Texas Workforce Commission |
| TWC-CRD | Texas Workforce Commission Civil Rights Division |
| TxCDBG | Texas Community Development Block Grant Program |
| TxDOT | Texas Department of Transportation |
| UFAS | Uniform Federal Accessibility Standards |
| UTP | Unified Transportation Program |
| VAWA | Violence Against Women Act |
| VLB | Texas Veterans Land Board |

| Acronym | Meaning |
|---------|---------|
| VLI | Very Low Income |

# Appendix B - R/ECAPS

R/ECAP Definition

According to AFFH Data Documentation (Source: AFFH Data Documentation, Version 3.1, July 2016), to assist communities in identifying racially or ethnically-concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50% or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of "extreme poverty" as census tracts with 40% or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. This translates into the equation shown in Figure B-1: R/ECAP Formula.

**Figure B-1: R/ECAP Formula**

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

Where $i$ represents census tracts, $(\mu_{PovRate}^{cbsa})$ is the metropolitan/micropolitan (CBSA) mean tract poverty rate, PovRate is the $i$th tract poverty rate, $(NHW_i)$ is the non-Hispanic white population in tract $i$, and Pop is the population in tract $i$.

While this definition of R/ECAP works well for tracts in CBSAs, places outside of these geographies are unlikely to have racial or ethnic concentrations as high as 50%. In these areas, the racial/ethnic concentration threshold is set at 20%.

# Appendix C - Diversity Index

In order to assess diversity in Texas, TDHCA researched many different methods for describing and defining integration and segregation. The simplest is the Dissimilarity Index. However, the Dissimilarity Index and nearly all other measures required looking at small geographical areas (census tracts or smaller) and comparing them to a larger region (MSA, TDHCA Service Region, etc.). This requirement implies there was an assumption that smaller areas should, normatively, look like the larger area in which they are situated. Other options required knowing the geographical distance between pockets of certain racial and ethnic groups. This level of data simply was not available to the State at any level, let alone regionally or statewide. In order to overcome these difficulties, TDHCA chose to innovate and create a Diversity Index that did not make normative assumptions as to the "ideal" demographic makeup and was flexible enough to handle the aggregated data that was available at many different geographic sizes. Additionally, the index would be easy to understand as it would be between 0 and 1, with higher values meaning higher diversity. The mathematical form of this Diversity Index is shown in Figure C-1.

**Figure C-1: Diversity Index Formula**

$$Diversity = \frac{(\prod_{rE=1}^{RE}(1 + P_{rE})) - (2 * E)}{(\prod_{rE=1}^{RE}(1 + \frac{1}{RE})) - (2 * E)}$$

Where:

$E$ = the total number of racial or ethnic categories whose members ($rE$) are mutually exclusive.

$RE$ = the total number of racial and ethnic groups in category $E$.

$rE$ = the individual racial or ethnic group in category $E$.

$P_{rE}$ = the proportion of the population that identifies as race/ethnicity $r$ in category $E$.

Diversity Index Example Case

In a simple example, an individual can be either Hispanic or Not Hispanic. There is one category of mutually exclusive ethnicities. In our example, the population will be 25% Hispanic and 75% Non-Hispanic. So in this case:

E = 1. Since E = 1, we can ignore E.

RE = 2 (Hispanic or Not Hispanic)

$P_{Hispanic}$ = .25

$P_{Non\ Hispanic} = .75$

$$\frac{((1 + .25) * (1 + .75)) - (2)}{\left(\left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right)\right) - (2)}$$

This simplifies to:

$$\frac{2.1875 - 2}{2.25 - 2} = \frac{.1875}{.25} = .75$$

The diversity index of this particular example area is .75. If this area had 50% Hispanic and 50% Non-Hispanic, the index would equal 1 and if the area were 100% Hispanic or 100% Non-Hispanic, the diversity index score would be 0.

To take a slightly more complicated example, keep the group of Hispanic and Non-Hispanic, and then include White and Some Other Race. A person can be only one of the two new options and can also only be either Hispanic or Not Hispanic. This means that a person can only be one of four distinct groups (White and Hispanic, White and Non-Hispanic, Some Other Race and Hispanic, Other and Non-Hispanic). Theoretically, given individual level data, these four options would just be like the first example but with four categories. However, when using aggregated data, this is likely not possible, depending upon the data source. So using our second example, let us assume that 40% of the population is Some Other Race and 60% is White, while 25% are Hispanic and 75% are Non-Hispanic:

E = 2

$RE_1$ = 2 (White and Some Other Race)

$RE_2$ = 2 (Hispanic and Not Hispanic)

$P_{Hispanic}$ = .25

$P_{Non\ Hispanic}$ = .75

$P_{White}$ = .6

$P_{Other}$ = .4

$$\frac{((1 + .25) * (1 + .75) * (1 + .6) * (1 + .4)) - (2 * 2)}{\left(\left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right) * \left(1 + \frac{1}{2}\right)\right) - (2 * 2)}$$

This simplifies to:

$$\frac{4.9 - 4}{5.0625 - 4} = \frac{.9}{1.0625} \approx .847$$

In this example, the area is more diverse than in the first example. Obviously the real world is not nearly so clean. In reality, using the Census Bureau's American Community Survey data, there are 7 total options for race (White Alone, Black and African American Alone, Asian Alone, American Indian and Alaskan Native Alone, Hawaiian and Other Pacific Islander Alone, Some Other Race Alone, and Two or More Races) as well as Hispanic and Non-Hispanic. This means there are two groups of mutually exclusive categories, one with seven possibilities and one with two, and no data available to quantify the cell sizes of the 14 categories that would be created by trying to find every permutation of race and ethnicity. For this reason, the Diversity Index was the logical and appropriate measure for a state with the size and the complexity of Texas. Some tracts do not have a diversity score because of a population of zero or a lack of demographic information in the ACS. Some of these tracts include airports and military bases where there may be an urban density of structures with a near-zero or zero population.

# Appendix D - Texas Community Development Block Grant

## TxCDBG Implementation Manual, Chapter 10 Excerpt

### 10.1.2 Non-Discrimination – Equal Opportunity Policy

Grant Recipients must take actions to ensure that no person or group is denied benefits such as employment, training, housing, and contracts generated by the local CDBG activity on the basis of race, color, religion, sex, national origin, age, or disability. For federally-assisted construction projects greater than $10,000, contractors may not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, or national origin.

Required actions include:

- Review existing local employment policies and include the EO policy in your local government policy manual/handbook.
- Include Equal Opportunity Employer notification in employment advertisements.
- Include applicable equal opportunity provisions and certifications in the bid packets, contracts, and subcontracts. These are included in the sample bid package found in *Chapter 5 Procurement*. Include the EO clause required by 2 CFR 200 Appendix II in all contracts and for construction contracts > $10,000.

### 10.1.3 Affirmatively Furthering Fair Housing

Section 808(e) (5) of the Fair Housing Act 42 USC 3608(e) (5) requires that HUD programs and activities be administered in a manner affirmatively to further the policies of the Fair Housing Act.

The Fair Housing Act provides for the protection of the following federally protected classes:

- Race
- Color
- Religion
- Sex
- Disability
- Familial status
- National origin

**Adopt and Publicize a Fair Housing Policy**

Grant Recipients must adopt (or affirm) a Fair Housing Policy by ordinance or resolution based on the requirements of the Fair Housing Act to affirmatively further fair housing choices for all seven protected classes.

- Include in the policy a plan for activities that will affirmatively further fair housing in the community.
- If the Grant Recipient is a city, pass a fair housing ordinance. If possible, include a penalty clause in the ordinance.
- If the Grant Recipient is a county, adopt written fair housing policies and procedures that are equivalent to a fair housing ordinance.
- Grant Recipients should consult with their county/city attorney or contact the applicable trade association (Texas Municipal League or Texas Association of Counties) for a sample fair housing ordinance or policy.
- See also Sample Resolution Regarding Civil Rights (**Form A1014),** Sample Fair Housing Policy Form (**A1015)**; and Sample Fair Housing Month Proclamation **(Form A1007).**

Grant Recipients must take at least one more action during the agreement term which publicizes the effort to affirmatively further fair housing.

- Publicize the fair housing policy through newspaper publication, fliers enclosed in utility bills, or public service announcement, see Sample Fair Housing Public Service Announcement (Form A1009).
- Host a fair housing booth for a local event.
- Designate April or any other month as Fair Housing Month by Proclamation or Resolution along with another sponsoring activity. Another fair housing activity must take place if this activity is chosen. See NOTE below and Sample Fair Housing Month Proclamation (Form A1007).
- Have a written local complaint and monitoring process for the fair housing policy and notify the public of its existence through newspaper advertisements, or through notices in utility statements.

**Enhanced Ideas for Meeting the Fair Housing Activities Requirement**

If a Fair Housing Policy has previously been adopted by the jurisdiction, Grant Recipients may request to meet the agreement's fair housing requirement using one of the following activities instead.

**NOTE**: If a grant application assigns additional points for fair housing activities, the Grant Recipient must select an activity from this list OR receive prior approval from TDA staff in order to receive those points.

- Conduct a community-wide housing analysis to determine impediments to fair housing and implement actions to eliminate these impediments.
- Sponsor or fund fair housing counseling/referral services for owners and renters.

- Promote housing opportunities outside historically minority and/or low- and moderate-income neighborhoods.
- Utilize local businesses and banking institutions (minimum of 15 organizations) to promote fair housing by displaying fair housing posters.
- Conduct free training workshops on fair housing laws to homebuyers, rental property owners, and tenant organizations.
- Sponsor a poster contest or essay writing contest at local schools to educate and promote fair housing.
- Review local zoning laws and procedures to determine whether they contribute to, or detract from, fair housing choice. Conduct a public meeting to discuss the analysis and conclusions.
- Find ways to inform builders and architects as early as possible in the project design phase, but certainly no later than the issuance of a building permit, of the need to comply with the accessibility requirements of the Fair Housing Act.

**Fair Housing Activities Resource**

HUD's fair housing website contains a wealth of information and tools for Grant Recipients to use in conducting fair housing activities. Resources on the website include

- A fair housing planning guide
- Fair housing brochures and logos
- Fair housing best practices
- Contact information for fair housing advocacy organizations
- Accessibility guidelines for housing units

TDA recognizes that in order to conduct a fair housing activity the Grant Recipient will incur costs. The Grant Recipient may elect to pay for fair housing activities and count the expenses toward the local match requirement or submit a reimbursement request for eligible and reasonable costs to be paid by the TxCDBG grant under the General Administration line item.

**Filing a Complaint Regarding Fair Housing in the State of Texas**

The Texas Workforce Commission (TWC) is the entity responsible for enforcing the Fair Housing Act in the State of Texas. Complaints can also be made directly to HUD. Citizens have one year after an alleged violation to file a complaint. Complaints can be filed by email, fax, phone call, hand-delivery, or mail to:

**Texas Workforce Commission**
Civil Rights Division
1117 Trinity Street, Room 144-T
Austin, Texas 78701
(888) 452-4778 or (512) 463-2642

TTY: 512-371-7473
Fax: 512-463-2643
Download the TWC Complaint Form – HousingComplaint@twc.state.tx.us

10.1.4 Section 504 Accessibility Policy

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination in federally-assisted programs on the basis of disability. Section 504 imposes requirements to ensure that qualified individuals with disabilities have access to programs and activities that receive federal funds. Grant Recipients must adhere to the following procedures.

**Adoption of Grievance Procedures**

Any Grant Recipient that employs 15 or more employees must adopt grievance procedures that incorporate **due process standards** and allow for quick and prompt resolution of complaints alleging any action prohibited by Section 504. Grievance procedures are not required to cover applicants for employment or applicants for housing, see *Section 504 Policy Against Discrimination based on Disability and Grievance Procedure* **(Form A1004)**.

**Notices**

Any Grant Recipient that employs 15 or more employees must notify all participants, applicants, and employees, including those with impaired vision or hearing, and unions, or professional organizations holding collective bargaining or professional agreements with the Grant Recipient that it does not discriminate on the basis of handicap in violation of Section 504. The notice must identify the individual designated to coordinate its Section 504 compliance (the Civil Rights Officer) and must state, where appropriate, that the Grant Recipient does not discriminate in admission or access to, or treatment or employment in, its federally assisted programs.

The notification process must ensure that all individuals, including those with visual and hearing impairments, are aware of the non-discrimination pledge.

Any recruitment or informational material published by the Grant Recipient must contain a statement regarding the Grant Recipient's pledge not to discriminate based on disability in violation of 24 CFR Part 8.

**Self-Evaluation**

During the contract period, all Grant Recipients are required to comply with Section 504 and must complete a self-evaluation of their Section 504 compliance and keep it on file for monitoring purposes. Grant Recipients that have completed a self-evaluation for a previous TxCDBG contract may use their previous self-evaluation forms on file to meet this requirement if all information remains accurate. During the self-evaluation process, the **Grant Recipient must consult with**

**individuals with disabilities or organizations representing them**. The self-evaluation includes an examination of policies and practices relative to the Section 504 regulations. Any policies and practices that do not meet the Section 504 requirements must be modified, and corrective action taken to remedy any discrimination found, see *Section 504 Self-Evaluation Form* **(Form A1006)**.

**Communication**

Grant Recipients should furnish appropriate auxiliary aids where necessary to allow an individual with disabilities an equal opportunity to participate in all CDBG program activities. Grant Recipients should implement procedures that allow individuals with disabilities to obtain information concerning the existence and location of accessible services, activities and facilities. Such procedures must ensure, to the maximum extent possible, that individuals with disabilities receive the benefits and services of the program or activity receiving CDBG assistance.

Examples of auxiliary aids include telecommunication devices for the deaf (TDD), Text Telephone (TTY), the Texas Relay System (where a TDD is not feasible), audio visual presentations, qualified sign language and oral interpreters, readers, or the use of taped and Braille materials, interpreters, large-lettered notices, and posting notices at a level readable by individuals in wheelchairs.

**Accessible Facilities**

For all publicly-funded construction, renovation, or modification to buildings or facilities in which construction is expected to cost $50,000 or more, Grant Recipients are required to submit plans and specifications to the Texas Department of Licensing and Regulation (TDLR) for review and approval. TDLR is responsible for ensuring that all plans and specifications meet accessibility requirements in accordance with the elimination of architectural barriers provisions of Chapter 469 of the Texas Government Code. TDLR regulations further require inspection of completed construction of applicable buildings or facilities to ensure compliance with Texas Accessibility Standards. The TDLR clearance requirements are included in the special conditions of all TxCDBG contracts that include public facilities.

**Employment**

Grant Recipients should not use any practices that unreasonably limit employment opportunities for individuals with disabilities. Grant Recipients must also reasonably accommodate the known needs of employees and applicants with special needs. Examples include retrofitting workstations to accommodate wheelchairs and providing special computers for hearing and sight challenged workers.

## 10.1.5 Limited English Proficiency Plan

Each Grant Recipient must take reasonable steps to provide meaningful access to federally-funded programs (grants) for all persons with Limited English Proficiency (LEP). Grant Recipients must establish and adopt a plan for each grant project, determining if there is a need for LEP services within the community and, if applicable, how appropriate language assistance will be given.

LEP persons are individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Grant Recipients are encouraged to review HUD's Frequently Asked Questions (FAQ) website to understand the expectations and purpose of LEP when evaluating the appropriate provisions for a TxCDBG project.

Identifying requirements for providing LEP services requires a **four-factor analysis**:

- The number or proportion of LEP persons served or encountered in the eligible service population. **Served** or **encountered** includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services;
- The frequency with which LEP persons come into contact with the program;
- The nature and importance of the program, activity, or service provided by the program; and
- The resources available and costs to the recipient.

Safe harbor guidance—which identifies actions that will be considered strong evidence of compliance—for the first factor is published by the U.S. Department of Justice and uses the Census Bureau data .

- To determine the local need for LEP services, subrecipient may use the Census Bureau's data tools.
- Type in the federally funded project's location (e.g. city or county name) and select 'go'; then, on left side of screen, choose 'Origins and Language'; then 'Selected Social Characteristics' (DP02). Next, scroll to 'Language Spoken at Home' and review the number or percent of 'Speaks English less than very well' under the subcategories of Spanish, Other Indo-European languages, and Other languages.
- Other American FactFinder data tables that provide similar information are S1601, B16001, B16002, and C16001 - if one of these sources is used, please note the table number on the Group A Performance Report. As a general rule, if the size of the language group is more than 5% of the eligible population or beneficiaries and has more than 50 in number, or if the language group has more than 1,000 individuals in the

eligible population in the market area or among current beneficiaries, then vital documents must be translated.

- Language groups should not be aggregated together. If the <u>Census Bureau data</u> indicates that less than 5% of the community population speaks English less than very well, the Grant Recipient must use its knowledge of the project beneficiaries to determine whether language assistance may still be needed.
- In addition, consider whether the project is located in an area of the community that is more likely to include LEP residents than the jurisdiction overall – if so, services must be provided.

Once the required services are identified, the Grant Recipient must identify the vital documents covered by the LEP plan. Vital documents are those documents that ensure that an eligible LEP person can meaningfully have access to the CDBG project. Thus, vital documents include Citizen Participation notices (complaint procedures, hearings notices, civil rights notices), environmental notices, outreach notices and application materials for housing rehabilitation or on-site sewer facility assistance, and any other published notice that may allow an eligible person with limited English proficiency to participate in discussing proposed CDBG activities.

- If a document is required by the LEP policy to be translated, the full text translation must be made available.
- **BEST PRACTICE**: Publish or post the full text of the translated document alongside the English language version.
- In certain cases, the Grant Recipient may publish the full text of the English language document along with a translated summary of the document's contents and contact information for obtaining the full text. This option is available ONLY if Table DP02 (or alternate table noted above) identifies less than 10% of residents as "speaks English less than very well" AND the LEP plan does not identify additional LEP needs based on the project's location.
- **EXAMPLE**: La ciudad de [Sample] ha realizado una revisión ambiental para el proyecto de construcción de la línea de agua en Main Street, financiado por el Programa de Subvenciones en Bloque para el Desarrollo Comunitario de Texas. Para revisar una traducción completa de este aviso en español, comuníquese con [Nombre] al [teléfono] o [correo electrónico].
- A reference to translation availability without also summarizing the content of the document is not sufficient for effective communication with LEP persons.

Limited English Proficiency (LEP) Plans are grant/project specific and therefore apply only to the particular grant and period. The LEP plan is documented as part of the *Group A Performance Report* in TDA-GO.

## 10.1.6 Excessive Force Policy

In accordance with Section 104(l) of the Housing and Community Development Act, as amended, Grant Recipients receiving TxCDBG funding must adopt an Excessive Force Policy that prohibits the use of excessive force against non-violent civil rights demonstrations.

When Grant Recipients execute their agreement(s) they certify that they will pass and enforce the following policies:

- A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; **and/or**
- A policy of enforcing applicable state and local laws against physically barring the entrance to, or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.
- See Sample Excessive Force Policy (**Form A1003**).

## 10.1.7 Disadvantaged Businesses

Grant Recipients must affirmatively take necessary steps to utilize small (SBE), minority-owned (MBE) and women-owned businesses (WBE). Although Grant Recipients are not directly responsible for meeting a specific minority business participation goal, TDA reports to HUD on the levels of MBE and WBE hiring under all TxCDBG contracts.

The following suggestions can be used to increase participation of small, minority- and women-owned businesses.

- Place qualified small, minority, and women-owned firms on solicitation lists. The Texas Comptroller of Public Accounts provides the Historically Underutilized Business (HUB) Directory that includes small businesses that are minority and women-owned. The directory and other information on HUB certification is available on the Texas Comptroller's website.
- Utilize the Minority Business Development Centers (MBDCs) located throughout Texas. The Minority Business Development Agency of the U.S. Department of Commerce funds MBDCs. This network can assist in achieving local and state minority business goals by providing relevant information, management assistance, technical assistance, program outreach, and brokerage services to minority firms.
- Solicit bids/services from small, minority, and women-owned businesses when issuing requests for proposals (RFPs), requests for qualifications (RFQs), and soliciting construction bids.

- Divide project activities into smaller tasks or services to allow participation by these types of businesses, if economically feasible. Discuss with TxCDBG staff to avoid violation of program rules with respect to small purchase procurement and awards to best, most responsible bid.
- Provide direct bonding assistance to minority business enterprises in order to promote their participation in the CDBG funded projects.
- **NOTE**: Payment of bond premiums on behalf of such firms is an allowable expenditure that can be paid for with CDBG funds only out of the general administration budget category.
- Provide small, minority and women-owned businesses with information regarding the Small Business Administration (SBA) Surety Bond Guarantee Program. This program opens the bonding system to new, small, or financially marginal disadvantaged construction contractors who are not able to obtain bonding through their own efforts or find it too costly in the standard market. Information on the program and local contact information can be found on the SBA website.

In order to meet federal reporting requirements, the Grant Recipient must provide data regarding the ownership of each vendor/service provider on the TDA-GO Materials and Services Report, see *Chapter 5 Procurement Procedures.*

## 10.1.8 Section 3 Economic Opportunities

Section 3 of the Housing and Urban Development Act of 1968 requires that, to the greatest extent feasible, economic opportunity generated by CDBG funds and other HUD assistance, most importantly employment, is directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, as well as residents of the community in which the federal funds are spent.

HUD established benchmarks for Section 3 goals and expects the TxCDBG program to cumulatively report 25% of the total labor hours for grant-assisted projects each year as performed by Section 3 Workers; the HUD benchmark for Targeted Section 3 Workers is 5% of total labor hours worked. Failure to achieve these benchmarks requires additional justification by the state, which may necessitate additional information from Grant Recipients.

HUD's administrative rules establish the requirements to be followed to ensure the objectives of Section 3 are met. Federal rules do not require Grant Recipients to contract or subcontract with a Section 3 business, nor do the rules require hiring of Section 3 workers. However, Grant Recipients must be able to demonstrate that, where possible, contracting, employment, and training opportunities were made available to workers and businesses meeting Section 3 designation criteria.

**Applicability**

Section 3 requirements apply to all TxCDBG grants unless otherwise identified by this Implementation Manual or the Grant Agreement.

- The requirements apply to the entire project that is funded with Section 3 covered financial assistance, regardless of whether the Section 3 project is fully- or partially-funded with CDBG assistance.
- All construction and administrative services contracts must comply with the programmatic requirements below.
- All work performed by employees of the Grant Recipient and its partners, regardless of whether force account cost reimbursement is requested, must comply with the programmatic requirements below.
- Section 3 goals and data reporting requirements generally do not apply to contracts for materials, planning, and professional services. Professional services include non-construction services that require an advanced degree or professional licensing (e.g., engineering, architecture, land surveying, accounting).

**Section 3 Compliance**

Grant Recipients must complete each of the following steps in order to be considered compliant with Section 3 programmatic requirements. Key terms for these steps are described in the following sections:

**Step 1. Identify the Section 3 Service Area**
A Section 3 Service Area for a TxCDBG project is determined as follows:

- Identify the project site. For infrastructure projects, the project site is the area included in the Environmental Review project description. The address of the center point of this project site is the basis for the Section 3 Service Area.
- Use HUD's Neighborhood Service Area Definition Tool to identify an area in which a minimum of 5,000 persons reside.

**Step 2. Facilitate Contracting Opportunities for Section 3 Businesses**
Prior to procuring or selecting any contract for construction services, the contracting opportunity must be reported to the resources below, in addition to any public advertisements required by *Chapter 5 Procurement Procedures.* The opportunity may be reported to these resources by any interested party. Retain a screen shot of each resource demonstrating that the data was provided at least ten business days prior to the bid opening date for each opportunity unless otherwise directed by TDA staff:

- HUD's Section 3 Opportunity Portal:

- o Recipient Tax ID:746027560
- o Recipient Agency: Texas Department of Agriculture
- o Recipient Agency Location: Texas
- At least one organization providing access to and assistance with bid opportunities, particularly those that recognize small and disadvantaged businesses that are likely to include Section 3 Businesses, such as:
  - o Public/non-profit organizations;
  - o Private plan rooms; or
  - o Local Workforce Solutions Offices (WIOA One Stop Shop), if applicable
  - o TDA-GO Materials and Services Record Pre-Selection Clearance data including bid opening date.

**NOTE**: TDA will ensure that Section 3 Businesses are included in the pre-qualified grant administrator application process, therefore, this step is not required for administration services.

**Step 3. Facilitate General Employment Opportunity Information for Section 3 Workers**

In an open meeting of the local governing body, the Grant Recipient must present the Section 3 goals of the CDBG program. This item must be reflected in the agenda and/or minutes of the meeting. TDA recommends completing this step at the meeting prior to the first publication for a construction bid process; however, in all cases it must be completed prior to requesting grant funds to reimburse construction costs, see *Chapter 1 Administration and Reporting*.

The presentation must include

- HUD's Section 3 Opportunity Portal
- Texas Workforce Solutions and
- Other Section 3 information as described in the *Section 3 Sample Presentation to Local Community* **(Form A1024).**

**Step 4. Facilitate Specific Employment Opportunities for Section 3 Workers**

If new employees are needed OR if vacancies exist for work on the TxCDBG-assisted project, the Grant Recipient and/or contractor must access the following resources to identify potential Section 3 employees—a printout of the results of the portal search in the local files is acceptable documentation of this effort. Grant Recipients and contractors are not required to employ Section 3 workers, nor to modify the qualifications or requirements of the position but must demonstrate an effort to identify potential employees as appropriate, including documentation for any applicants that are Section 3 Workers.

- HUD's Section 3 Opportunity Portal
- Texas Workforce Solutions and
- Local Workforce Solutions Office (WIOA One Stop Shop), if applicable.

**Step 5. Ensure Contractor Compliance**

- Include the required contract provision in all applicable contracting opportunities. See Appendices D and F.
- Collect records for all construction and administration service providers, including subcontractors, documenting the labor hours performed by each employee and the Section 3 status of each employee. Generally, this consists of payroll records and certification of status for each employee. A summary of this information must be reported to TDA as part of the Project Completion Report and each Materials and Services Report Contract Completion, and support documentation must be maintained in the local files.

**Step 6. Additional Efforts**

Record all additional efforts to ensure Section 3 Businesses have opportunity to compete for contracting opportunities, and that Section 3 Workers and Targeted Section 3 Workers have the opportunity to benefit from the TxCDBG assistance. These efforts support the state's explanation, should the program not meet the established benchmarks, and identify areas where the TxCDBG program could support Section 3 Business and Workers in the future. Examples include:

- Outreach efforts
- Training or apprenticeship opportunities
- Technical assistance to Section 3 workers (multiple types)
- Technical assistance to Section 3 business concerns
- Job fairs
- Divide contracts into smaller jobs
- Bonding assistance
- Other business registries

## 10.1.9 VAWA Certification

The Violence Against Women Act (VAWA) Reauthorization Act of 2022, which became effective October 1, 2022, includes a new requirement Grant Recipients to support an individual's, including survivor's, right to seek law enforcement or emergency assistance. TxCDBG grants awarded on or after the effective date will be required to:

1. "Report any of their laws or policies, or, as applicable, the laws or policies adopted by subgrantees, that impose penalties on landlords, homeowners, tenants, residents, occupants, guests, or housing applicants based on requests for law enforcement or emergency assistance or based on criminal activity that occurred at a property; and

2. Certify that they are in compliance with the VAWA requirements.

## TxCDBG Implementation Manual, Section C and Form C2 Sample Guidelines

Single-family unit(s) owned by a community based development organization (CBDO) and occupied by primarily low or moderate income persons will be eligible for assistance.

- A single family structure is defined as 1 to 4 units; only the units occupied by LMI persons are eligible for assistance.
- The CBDO must sign a letter of commitment to maintain the housing units for residents that meet eligibility criteria of both CDBG and the CBDO for a minimum of five years.
- A CBDO must meet the definition found in the Housing and Community Development Act of 1974, as Amended, Section 105(a)(15):
  - neighborhood-based nonprofit organizations,
  - local development corporations,
  - nonprofit organizations serving the development needs of the communities in non-entitlement areas,
  - entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out a neighborhood revitalization or community economic development or energy conservation project in furtherance of the objectives of section 101(c) of this title, and
  - nonprofit organizations assisting the development of shared housing opportunities (other than by construction of new facilities) for elderly families.

# Appendix E - Disaster Recovery Supplements

**Figure E-1: CDBG-DR Eligible Counties in Texas**

| County |
| --- |
| Austin |
| Aransas |
| Bastrop |
| Bee |
| Brazoria |
| Burleson |
| Caldwell |
| Calhoun |
| Chambers |
| Colorado |
| Comal |
| DeWitt |
| Fayette |
| Fort Bend |
| Galveston |
| Goliad |
| Gonzales |

| County |
| --- |
| Grimes |
| Guadalupe |
| Hardin |
| Harris |
| Jackson |
| Jasper |
| Jefferson |
| Jim Wells |
| Karnes |
| Kleberg |
| Lavaca |
| Lee |
| Liberty |
| Madison |
| Matagorda |
| Milam |
| Montgomery |

| County |
| --- |
| Newton |
| Nueces |
| Orange |
| Polk |
| Refugio |
| Sabine |
| San Augustine |
| San Jacinto |
| San Patricio |
| Tyler |
| Victoria |
| Walker |
| Waller |
| Washington |
| Wharton |

Source: Appendix A of the CDBG-DR State Plan.

**Figure E-2: Texas Division of Emergency Management Preparedness Unit Regions**

| TDEM Region | County | TDEM Region | County |
| --- | --- | --- | --- |
| 1 | Anderson | 1 | Smith |
| 1 | Bowie | 1 | Somervell |
| 1 | Camp | 1 | Tarrant |
| 1 | Cass | 1 | Titus |
| 1 | Cherokee | 1 | Upshur |
| 1 | Collin | 1 | Van Zandt |
| 1 | Cooke | 1 | Wise |
| 1 | Dallas | 1 | Wood |
| 1 | Delta | 2 | Angelina |
| 1 | Denton | 2 | Austin |
| 1 | Ellis | 2 | Brazoria |
| 1 | Erath | 2 | Brazos |
| 1 | Fannin | 2 | Burleson |
| 1 | Franklin | 2 | Chambers |
| 1 | Grayson | 2 | Colorado |
| 1 | Gregg | 2 | Fort Bend |
| 1 | Harrison | 2 | Galveston |
| 1 | Henderson | 2 | Grimes |
| 1 | Hood | 2 | Hardin |
| 1 | Hopkins | 2 | Harris |
| 1 | Hunt | 2 | Houston |
| 1 | Johnson | 2 | Jasper |
| 1 | Kaufman | 2 | Jefferson |
| 1 | Lamar | 2 | Leon |
| 1 | Marion | 2 | Liberty |
| 1 | Morris | 2 | Madison |
| 1 | Panola | 2 | Matagorda |
| 1 | Navarro | 2 | Montgomery |
| 1 | Palo Pinto | 2 | Nacogdoches |
| 1 | Parker | 2 | Newton |
| 1 | Rains | 2 | Orange |
| 1 | Red River | 2 | Polk |
| 1 | Rockwall | 2 | Robertson |
| 1 | Rusk | 2 | Sabine |

| TDEM Region | County | TDEM Region | County |
|---|---|---|---|
| 2 | San Augustine | 3 | Zavala |
| 2 | San Jacinto | 4 | Andrews |
| 2 | Shelby | 4 | Borden |
| 2 | Trinity | 4 | Brewster |
| 2 | Tyler | 4 | Coke |
| 2 | Walker | 4 | Concho |
| 2 | Waller | 4 | Crane |
| 2 | Washington | 4 | Crockett |
| 2 | Wharton | 4 | Culberson |
| 3 | Aransas | 4 | Dawson |
| 3 | Bee | 4 | Ector |
| 3 | Brooks | 4 | El Paso |
| 3 | Cameron | 4 | Gaines |
| 3 | Dimmit | 4 | Glasscock |
| 3 | Duval | 4 | Howard |
| 3 | Edwards | 4 | Hudspeth |
| 3 | Hidalgo | 4 | Irion |
| 3 | Jim Hogg | 4 | Jeff Davis |
| 3 | Jim Wells | 4 | Kimble |
| 3 | Kenedy | 4 | Loving |
| 3 | Kinney | 4 | Mason |
| 3 | Kleberg | 4 | Martin |
| 3 | LaSalle | 4 | McCulloch |
| 3 | Live Oak | 4 | Menard |
| 3 | Maverick | 4 | Midland |
| 3 | Nueces | 4 | Pecos |
| 3 | Real | 4 | Presidio |
| 3 | Refugio | 4 | Reagan |
| 3 | San Patricio | 4 | Reeves |
| 3 | Starr | 4 | Schleicher |
| 3 | Webb | 4 | Sterling |
| 3 | Willacy | 4 | Sutton |
| 3 | Uvalde | 4 | Terrell |
| 3 | Val Verde | 4 | Tom Green |
| 3 | Zapata | 4 | Upton |

| TDEM Region | County | TDEM Region | County |
|---|---|---|---|
| 4 | Ward | 5 | Hemphill |
| 4 | Winkler | 5 | Hockley |
| 5 | Archer | 5 | Hutchinson |
| 5 | Armstrong | 5 | Jack |
| 5 | Bailey | 5 | Jones |
| 5 | Baylor | 5 | Kent |
| 5 | Briscoe | 5 | King |
| 5 | Brown | 5 | Knox |
| 5 | Callahan | 5 | Lamb |
| 5 | Carson | 5 | Lipscomb |
| 5 | Castro | 5 | Lubbock |
| 5 | Clay | 5 | Lynn |
| 5 | Childress | 5 | Mitchell |
| 5 | Cochran | 5 | Montague |
| 5 | Coleman | 5 | Moore |
| 5 | Collingsworth | 5 | Motley |
| 5 | Comanche | 5 | Nolan |
| 5 | Cottle | 5 | Ochiltree |
| 5 | Crosby | 5 | Oldham |
| 5 | Dallam | 5 | Parmer |
| 5 | Deaf Smith | 5 | Potter |
| 5 | Dickens | 5 | Randall |
| 5 | Donley | 5 | Roberts |
| 5 | Eastland | 5 | Runnels |
| 5 | Fisher | 5 | Scurry |
| 5 | Floyd | 5 | Shackleford |
| 5 | Foard | 5 | Sherman |
| 5 | Garza | 5 | Stephens |
| 5 | Gray | 5 | Stonewall |
| 5 | Hale | 5 | Swisher |
| 5 | Hall | 5 | Taylor |
| 5 | Hansford | 5 | Terry |
| 5 | Hardeman | 5 | Throckmorton |
| 5 | Hartley | 5 | Wheeler |
| 5 | Haskell | 5 | Wichita |

| TDEM Region | County |
|---|---|
| 5 | Wilbarger |
| 5 | Yoakum |
| 5 | Young |
| 6 | Atascosa |
| 6 | Bandera |
| 6 | Bastrop |
| 6 | Bell |
| 6 | Bexar |
| 6 | Blanco |
| 6 | Bosque |
| 6 | Burnet |
| 6 | Caldwell |
| 6 | Calhoun |
| 6 | Comal |
| 6 | Coryell |
| 6 | DeWitt |
| 6 | Falls |
| 6 | Fayette |
| 6 | Freestone |
| 6 | Frio |
| 6 | Gillespie |
| 6 | Goliad |
| 6 | Gonzales |
| 6 | Guadalupe |
| 6 | Hamilton |
| 6 | Hays |
| 6 | Hill |
| 6 | Jackson |
| 6 | Karnes |
| 6 | Kendall |
| 6 | Kerr |
| 6 | Lampasas |
| 6 | Lavaca |
| 6 | Lee |
| 6 | Limestone |

| TDEM Region | County |
|---|---|
| 6 | Llano |
| 6 | McMullen |
| 6 | Medina |
| 6 | Milam |
| 6 | Mills |
| 6 | McLennan |
| 6 | San Saba |
| 6 | Travis |
| 6 | Victoria |
| 6 | Williamson |
| 6 | Wilson |

Source: Texas Department of Public Safety, Texas Division of Emergency Management.

**Figure E-3: Low or Moderate Income in Census Block Groups in Texas, 2017**

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480079501001 | Block Group 1, Census Tract 9501, Aransas County, Texas | 42.1% |
| 480079501002 | Block Group 2, Census Tract 9501, Aransas County, Texas | 34.9% |
| 480079501003 | Block Group 3, Census Tract 9501, Aransas County, Texas | 42.9% |
| 480079501004 | Block Group 4, Census Tract 9501, Aransas County, Texas | 46.1% |
| 480079501005 | Block Group 5, Census Tract 9501, Aransas County, Texas | 46.4% |
| 480079502001 | Block Group 1, Census Tract 9502, Aransas County, Texas | 17.4% |
| 480079502002 | Block Group 2, Census Tract 9502, Aransas County, Texas | 14.9% |
| 480079503001 | Block Group 1, Census Tract 9503, Aransas County, Texas | 31.4% |
| 480079503002 | Block Group 2, Census Tract 9503, Aransas County, Texas | 27.0% |
| 480079503003 | Block Group 3, Census Tract 9503, Aransas County, Texas | 57.0% |
| 480079503004 | Block Group 4, Census Tract 9503, Aransas County, Texas | 57.5% |
| 480079504001 | Block Group 1, Census Tract 9504, Aransas County, Texas | 70.5% |
| 480079504002 | Block Group 2, Census Tract 9504, Aransas County, Texas | 28.7% |
| 480079504003 | Block Group 3, Census Tract 9504, Aransas County, Texas | 31.7% |
| 480079505001 | Block Group 1, Census Tract 9505, Aransas County, Texas | 26.9% |
| 480079505002 | Block Group 2, Census Tract 9505, Aransas County, Texas | 30.8% |
| 480079505003 | Block Group 3, Census Tract 9505, Aransas County, Texas | 53.8% |
| 480079505004 | Block Group 4, Census Tract 9505, Aransas County, Texas | 32.3% |
| 480079900000 | Block Group 0, Census Tract 9900, Aransas County, Texas | 0.0% |
| 480157601001 | Block Group 1, Census Tract 7601, Austin County, Texas | 59.3% |
| 480157601002 | Block Group 2, Census Tract 7601, Austin County, Texas | 58.8% |
| 480157602001 | Block Group 1, Census Tract 7602, Austin County, Texas | 59.5% |
| 480157602002 | Block Group 2, Census Tract 7602, Austin County, Texas | 13.8% |
| 480157602003 | Block Group 3, Census Tract 7602, Austin County, Texas | 32.8% |
| 480157602004 | Block Group 4, Census Tract 7602, Austin County, Texas | 58.6% |
| 480157603001 | Block Group 1, Census Tract 7603, Austin County, Texas | 27.7% |
| 480157603002 | Block Group 2, Census Tract 7603, Austin County, Texas | 34.9% |
| 480157603003 | Block Group 3, Census Tract 7603, Austin County, Texas | 34.4% |
| 480157603004 | Block Group 4, Census Tract 7603, Austin County, Texas | 36.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480157604001 | Block Group 1, Census Tract 7604, Austin County, Texas | 25.1% |
| 480157604002 | Block Group 2, Census Tract 7604, Austin County, Texas | 28.0% |
| 480157604003 | Block Group 3, Census Tract 7604, Austin County, Texas | 32.5% |
| 480157605011 | Block Group 1, Census Tract 7605.01, Austin County, Texas | 22.1% |
| 480157605012 | Block Group 2, Census Tract 7605.01, Austin County, Texas | 16.6% |
| 480157605013 | Block Group 3, Census Tract 7605.01, Austin County, Texas | 16.7% |
| 480157605021 | Block Group 1, Census Tract 7605.02, Austin County, Texas | 37.4% |
| 480157605022 | Block Group 2, Census Tract 7605.02, Austin County, Texas | 67.0% |
| 480157605023 | Block Group 3, Census Tract 7605.02, Austin County, Texas | 31.0% |
| 480157605024 | Block Group 4, Census Tract 7605.02, Austin County, Texas | 49.4% |
| 480219501001 | Block Group 1, Census Tract 9501, Bastrop County, Texas | 59.3% |
| 480219501002 | Block Group 2, Census Tract 9501, Bastrop County, Texas | 37.9% |
| 480219501003 | Block Group 3, Census Tract 9501, Bastrop County, Texas | 67.3% |
| 480219501004 | Block Group 4, Census Tract 9501, Bastrop County, Texas | 31.0% |
| 480219501005 | Block Group 5, Census Tract 9501, Bastrop County, Texas | 41.5% |
| 480219502001 | Block Group 1, Census Tract 9502, Bastrop County, Texas | 14.2% |
| 480219502002 | Block Group 2, Census Tract 9502, Bastrop County, Texas | 35.6% |
| 480219502003 | Block Group 3, Census Tract 9502, Bastrop County, Texas | 79.8% |
| 480219502004 | Block Group 4, Census Tract 9502, Bastrop County, Texas | 57.7% |
| 480219502005 | Block Group 5, Census Tract 9502, Bastrop County, Texas | 63.9% |
| 480219503001 | Block Group 1, Census Tract 9503, Bastrop County, Texas | 26.7% |
| 480219503002 | Block Group 2, Census Tract 9503, Bastrop County, Texas | 26.2% |
| 480219503003 | Block Group 3, Census Tract 9503, Bastrop County, Texas | 54.4% |
| 480219503004 | Block Group 4, Census Tract 9503, Bastrop County, Texas | 21.0% |
| 480219503005 | Block Group 5, Census Tract 9503, Bastrop County, Texas | 36.6% |
| 480219504001 | Block Group 1, Census Tract 9504, Bastrop County, Texas | 66.4% |
| 480219504002 | Block Group 2, Census Tract 9504, Bastrop County, Texas | 33.0% |
| 480219504003 | Block Group 3, Census Tract 9504, Bastrop County, Texas | 49.8% |
| 480219504004 | Block Group 4, Census Tract 9504, Bastrop County, Texas | 49.5% |
| 480219504005 | Block Group 5, Census Tract 9504, Bastrop County, Texas | 29.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480219505011 | Block Group 1, Census Tract 9505.01, Bastrop County, Texas | 62.3% |
| 480219505012 | Block Group 2, Census Tract 9505.01, Bastrop County, Texas | 39.0% |
| 480219505013 | Block Group 3, Census Tract 9505.01, Bastrop County, Texas | 45.4% |
| 480219505021 | Block Group 1, Census Tract 9505.02, Bastrop County, Texas | 41.4% |
| 480219505022 | Block Group 2, Census Tract 9505.02, Bastrop County, Texas | 45.8% |
| 480219505023 | Block Group 3, Census Tract 9505.02, Bastrop County, Texas | 29.5% |
| 480219506001 | Block Group 1, Census Tract 9506, Bastrop County, Texas | 55.5% |
| 480219506002 | Block Group 2, Census Tract 9506, Bastrop County, Texas | 59.9% |
| 480219506003 | Block Group 3, Census Tract 9506, Bastrop County, Texas | 41.1% |
| 480219507001 | Block Group 1, Census Tract 9507, Bastrop County, Texas | 61.5% |
| 480219507002 | Block Group 2, Census Tract 9507, Bastrop County, Texas | 50.0% |
| 480219507003 | Block Group 3, Census Tract 9507, Bastrop County, Texas | 38.7% |
| 480219507004 | Block Group 4, Census Tract 9507, Bastrop County, Texas | 85.8% |
| 480219508011 | Block Group 1, Census Tract 9508.01, Bastrop County, Texas | 87.7% |
| 480219508012 | Block Group 2, Census Tract 9508.01, Bastrop County, Texas | 29.3% |
| 480219508013 | Block Group 3, Census Tract 9508.01, Bastrop County, Texas | 77.6% |
| 480219508021 | Block Group 1, Census Tract 9508.02, Bastrop County, Texas | 61.0% |
| 480219508022 | Block Group 2, Census Tract 9508.02, Bastrop County, Texas | 48.2% |
| 480219508023 | Block Group 3, Census Tract 9508.02, Bastrop County, Texas | 37.4% |
| 480259501001 | Block Group 1, Census Tract 9501, Bee County, Texas | 41.2% |
| 480259501002 | Block Group 2, Census Tract 9501, Bee County, Texas | 31.4% |
| 480259502011 | Block Group 1, Census Tract 9502.01, Bee County, Texas | 0.0% |
| 480259502012 | Block Group 2, Census Tract 9502.01, Bee County, Texas | 0.0% |
| 480259502013 | Block Group 3, Census Tract 9502.01, Bee County, Texas | 31.9% |
| 480259502021 | Block Group 1, Census Tract 9502.02, Bee County, Texas | 50.9% |
| 480259502022 | Block Group 2, Census Tract 9502.02, Bee County, Texas | 42.9% |
| 480259502023 | Block Group 3, Census Tract 9502.02, Bee County, Texas | 10.9% |
| 480259502024 | Block Group 4, Census Tract 9502.02, Bee County, Texas | 26.2% |
| 480259503001 | Block Group 1, Census Tract 9503, Bee County, Texas | 25.6% |
| 480259503002 | Block Group 2, Census Tract 9503, Bee County, Texas | 33.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480259503003 | Block Group 3, Census Tract 9503, Bee County, Texas | 32.6% |
| 480259503004 | Block Group 4, Census Tract 9503, Bee County, Texas | 49.5% |
| 480259503005 | Block Group 5, Census Tract 9503, Bee County, Texas | 68.2% |
| 480259504001 | Block Group 1, Census Tract 9504, Bee County, Texas | 48.2% |
| 480259504002 | Block Group 2, Census Tract 9504, Bee County, Texas | 38.5% |
| 480259505001 | Block Group 1, Census Tract 9505, Bee County, Texas | 53.3% |
| 480259505002 | Block Group 2, Census Tract 9505, Bee County, Texas | 36.2% |
| 480259505003 | Block Group 3, Census Tract 9505, Bee County, Texas | 73.5% |
| 480259505004 | Block Group 4, Census Tract 9505, Bee County, Texas | 65.5% |
| 480259505005 | Block Group 5, Census Tract 9505, Bee County, Texas | 47.2% |
| 480259505006 | Block Group 6, Census Tract 9505, Bee County, Texas | 49.0% |
| 480259505007 | Block Group 7, Census Tract 9505, Bee County, Texas | 63.6% |
| 480259506001 | Block Group 1, Census Tract 9506, Bee County, Texas | 36.5% |
| 480396601001 | Block Group 1, Census Tract 6601, Brazoria County, Texas | 13.1% |
| 480396601002 | Block Group 2, Census Tract 6601, Brazoria County, Texas | 19.4% |
| 480396601003 | Block Group 3, Census Tract 6601, Brazoria County, Texas | 22.8% |
| 480396602001 | Block Group 1, Census Tract 6602, Brazoria County, Texas | 44.6% |
| 480396602002 | Block Group 2, Census Tract 6602, Brazoria County, Texas | 23.4% |
| 480396602003 | Block Group 3, Census Tract 6602, Brazoria County, Texas | 22.2% |
| 480396603001 | Block Group 1, Census Tract 6603, Brazoria County, Texas | 67.8% |
| 480396603002 | Block Group 2, Census Tract 6603, Brazoria County, Texas | 34.3% |
| 480396603003 | Block Group 3, Census Tract 6603, Brazoria County, Texas | 16.8% |
| 480396604001 | Block Group 1, Census Tract 6604, Brazoria County, Texas | 26.3% |
| 480396604002 | Block Group 2, Census Tract 6604, Brazoria County, Texas | 34.6% |
| 480396604003 | Block Group 3, Census Tract 6604, Brazoria County, Texas | 28.5% |
| 480396605001 | Block Group 1, Census Tract 6605, Brazoria County, Texas | 29.1% |
| 480396605002 | Block Group 2, Census Tract 6605, Brazoria County, Texas | 54.1% |
| 480396605003 | Block Group 3, Census Tract 6605, Brazoria County, Texas | 30.2% |
| 480396605004 | Block Group 4, Census Tract 6605, Brazoria County, Texas | 43.5% |
| 480396605005 | Block Group 5, Census Tract 6605, Brazoria County, Texas | 41.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480396605006 | Block Group 6, Census Tract 6605, Brazoria County, Texas | 46.9% |
| 480396606011 | Block Group 1, Census Tract 6606.01, Brazoria County, Texas | 10.9% |
| 480396606012 | Block Group 2, Census Tract 6606.01, Brazoria County, Texas | 23.4% |
| 480396606013 | Block Group 3, Census Tract 6606.01, Brazoria County, Texas | 22.8% |
| 480396606014 | Block Group 4, Census Tract 6606.01, Brazoria County, Texas | 19.3% |
| 480396606021 | Block Group 1, Census Tract 6606.02, Brazoria County, Texas | 40.4% |
| 480396606022 | Block Group 2, Census Tract 6606.02, Brazoria County, Texas | 14.4% |
| 480396607011 | Block Group 1, Census Tract 6607.01, Brazoria County, Texas | 22.7% |
| 480396607012 | Block Group 2, Census Tract 6607.01, Brazoria County, Texas | 32.4% |
| 480396607013 | Block Group 3, Census Tract 6607.01, Brazoria County, Texas | 0.9% |
| 480396607014 | Block Group 4, Census Tract 6607.01, Brazoria County, Texas | 13.9% |
| 480396607015 | Block Group 5, Census Tract 6607.01, Brazoria County, Texas | 14.6% |
| 480396607021 | Block Group 1, Census Tract 6607.02, Brazoria County, Texas | 79.9% |
| 480396607022 | Block Group 2, Census Tract 6607.02, Brazoria County, Texas | 12.5% |
| 480396607023 | Block Group 3, Census Tract 6607.02, Brazoria County, Texas | 54.4% |
| 480396608011 | Block Group 1, Census Tract 6608.01, Brazoria County, Texas | 16.7% |
| 480396608012 | Block Group 2, Census Tract 6608.01, Brazoria County, Texas | 37.3% |
| 480396608013 | Block Group 3, Census Tract 6608.01, Brazoria County, Texas | 25.5% |
| 480396608021 | Block Group 1, Census Tract 6608.02, Brazoria County, Texas | 20.2% |
| 480396608022 | Block Group 2, Census Tract 6608.02, Brazoria County, Texas | 16.4% |
| 480396608023 | Block Group 3, Census Tract 6608.02, Brazoria County, Texas | 25.5% |
| 480396609001 | Block Group 1, Census Tract 6609, Brazoria County, Texas | 69.7% |
| 480396609002 | Block Group 2, Census Tract 6609, Brazoria County, Texas | 27.4% |
| 480396609003 | Block Group 3, Census Tract 6609, Brazoria County, Texas | 63.3% |
| 480396609004 | Block Group 4, Census Tract 6609, Brazoria County, Texas | 82.1% |
| 480396610001 | Block Group 1, Census Tract 6610, Brazoria County, Texas | 66.6% |
| 480396610002 | Block Group 2, Census Tract 6610, Brazoria County, Texas | 51.8% |
| 480396610003 | Block Group 3, Census Tract 6610, Brazoria County, Texas | 50.2% |
| 480396611001 | Block Group 1, Census Tract 6611, Brazoria County, Texas | 62.0% |
| 480396611002 | Block Group 2, Census Tract 6611, Brazoria County, Texas | 35.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480396612001 | Block Group 1, Census Tract 6612, Brazoria County, Texas | 68.1% |
| 480396612002 | Block Group 2, Census Tract 6612, Brazoria County, Texas | 74.8% |
| 480396612003 | Block Group 3, Census Tract 6612, Brazoria County, Texas | 65.6% |
| 480396613001 | Block Group 1, Census Tract 6613, Brazoria County, Texas | 47.5% |
| 480396613002 | Block Group 2, Census Tract 6613, Brazoria County, Texas | 97.4% |
| 480396613003 | Block Group 3, Census Tract 6613, Brazoria County, Texas | 50.6% |
| 480396614001 | Block Group 1, Census Tract 6614, Brazoria County, Texas | 34.9% |
| 480396614002 | Block Group 2, Census Tract 6614, Brazoria County, Texas | 38.0% |
| 480396614003 | Block Group 3, Census Tract 6614, Brazoria County, Texas | 57.0% |
| 480396614004 | Block Group 4, Census Tract 6614, Brazoria County, Texas | 39.6% |
| 480396614005 | Block Group 5, Census Tract 6614, Brazoria County, Texas | 54.4% |
| 480396614006 | Block Group 6, Census Tract 6614, Brazoria County, Texas | 25.1% |
| 480396615011 | Block Group 1, Census Tract 6615.01, Brazoria County, Texas | 51.5% |
| 480396615012 | Block Group 2, Census Tract 6615.01, Brazoria County, Texas | 51.3% |
| 480396615013 | Block Group 3, Census Tract 6615.01, Brazoria County, Texas | 43.2% |
| 480396615021 | Block Group 1, Census Tract 6615.02, Brazoria County, Texas | 42.9% |
| 480396615022 | Block Group 2, Census Tract 6615.02, Brazoria County, Texas | 29.4% |
| 480396616011 | Block Group 1, Census Tract 6616.01, Brazoria County, Texas | 100.0% |
| 480396616012 | Block Group 2, Census Tract 6616.01, Brazoria County, Texas | 45.8% |
| 480396616013 | Block Group 3, Census Tract 6616.01, Brazoria County, Texas | 29.1% |
| 480396616014 | Block Group 4, Census Tract 6616.01, Brazoria County, Texas | 38.9% |
| 480396616021 | Block Group 1, Census Tract 6616.02, Brazoria County, Texas | 50.2% |
| 480396616022 | Block Group 2, Census Tract 6616.02, Brazoria County, Texas | 67.3% |
| 480396617001 | Block Group 1, Census Tract 6617, Brazoria County, Texas | 46.1% |
| 480396617002 | Block Group 2, Census Tract 6617, Brazoria County, Texas | 35.6% |
| 480396617003 | Block Group 3, Census Tract 6617, Brazoria County, Texas | 61.6% |
| 480396618001 | Block Group 1, Census Tract 6618, Brazoria County, Texas | 29.5% |
| 480396618002 | Block Group 2, Census Tract 6618, Brazoria County, Texas | 43.0% |
| 480396619001 | Block Group 1, Census Tract 6619, Brazoria County, Texas | 40.9% |
| 480396619002 | Block Group 2, Census Tract 6619, Brazoria County, Texas | 40.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480396619003 | Block Group 3, Census Tract 6619, Brazoria County, Texas | 35.4% |
| 480396619004 | Block Group 4, Census Tract 6619, Brazoria County, Texas | 100.0% |
| 480396620001 | Block Group 1, Census Tract 6620, Brazoria County, Texas | 36.5% |
| 480396620002 | Block Group 2, Census Tract 6620, Brazoria County, Texas | 90.3% |
| 480396620003 | Block Group 3, Census Tract 6620, Brazoria County, Texas | 15.0% |
| 480396620004 | Block Group 4, Census Tract 6620, Brazoria County, Texas | 12.6% |
| 480396620005 | Block Group 5, Census Tract 6620, Brazoria County, Texas | 49.2% |
| 480396621001 | Block Group 1, Census Tract 6621, Brazoria County, Texas | 69.0% |
| 480396621002 | Block Group 2, Census Tract 6621, Brazoria County, Texas | 27.1% |
| 480396621003 | Block Group 3, Census Tract 6621, Brazoria County, Texas | 54.6% |
| 480396622001 | Block Group 1, Census Tract 6622, Brazoria County, Texas | 25.2% |
| 480396622002 | Block Group 2, Census Tract 6622, Brazoria County, Texas | 42.8% |
| 480396622003 | Block Group 3, Census Tract 6622, Brazoria County, Texas | 47.7% |
| 480396622004 | Block Group 4, Census Tract 6622, Brazoria County, Texas | 45.0% |
| 480396623001 | Block Group 1, Census Tract 6623, Brazoria County, Texas | 40.4% |
| 480396623002 | Block Group 2, Census Tract 6623, Brazoria County, Texas | 50.8% |
| 480396623003 | Block Group 3, Census Tract 6623, Brazoria County, Texas | 44.8% |
| 480396623004 | Block Group 4, Census Tract 6623, Brazoria County, Texas | 53.3% |
| 480396624001 | Block Group 1, Census Tract 6624, Brazoria County, Texas | 31.8% |
| 480396624002 | Block Group 2, Census Tract 6624, Brazoria County, Texas | 62.8% |
| 480396624003 | Block Group 3, Census Tract 6624, Brazoria County, Texas | 50.5% |
| 480396624004 | Block Group 4, Census Tract 6624, Brazoria County, Texas | 40.2% |
| 480396625001 | Block Group 1, Census Tract 6625, Brazoria County, Texas | 17.9% |
| 480396625002 | Block Group 2, Census Tract 6625, Brazoria County, Texas | 87.2% |
| 480396626001 | Block Group 1, Census Tract 6626, Brazoria County, Texas | 61.1% |
| 480396626002 | Block Group 2, Census Tract 6626, Brazoria County, Texas | 45.4% |
| 480396626003 | Block Group 3, Census Tract 6626, Brazoria County, Texas | 39.6% |
| 480396626004 | Block Group 4, Census Tract 6626, Brazoria County, Texas | 52.9% |
| 480396627001 | Block Group 1, Census Tract 6627, Brazoria County, Texas | 36.1% |
| 480396627002 | Block Group 2, Census Tract 6627, Brazoria County, Texas | 24.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480396628001 | Block Group 1, Census Tract 6628, Brazoria County, Texas | 60.7% |
| 480396628002 | Block Group 2, Census Tract 6628, Brazoria County, Texas | 60.1% |
| 480396628003 | Block Group 3, Census Tract 6628, Brazoria County, Texas | 8.1% |
| 480396628004 | Block Group 4, Census Tract 6628, Brazoria County, Texas | 76.0% |
| 480396628005 | Block Group 5, Census Tract 6628, Brazoria County, Texas | 39.2% |
| 480396628006 | Block Group 6, Census Tract 6628, Brazoria County, Texas | 31.4% |
| 480396629001 | Block Group 1, Census Tract 6629, Brazoria County, Texas | 51.2% |
| 480396629002 | Block Group 2, Census Tract 6629, Brazoria County, Texas | 43.2% |
| 480396629003 | Block Group 3, Census Tract 6629, Brazoria County, Texas | 46.0% |
| 480396629004 | Block Group 4, Census Tract 6629, Brazoria County, Texas | 35.1% |
| 480396630001 | Block Group 1, Census Tract 6630, Brazoria County, Texas | 42.2% |
| 480396630002 | Block Group 2, Census Tract 6630, Brazoria County, Texas | 67.1% |
| 480396630003 | Block Group 3, Census Tract 6630, Brazoria County, Texas | 0.0% |
| 480396630004 | Block Group 4, Census Tract 6630, Brazoria County, Texas | 39.0% |
| 480396631001 | Block Group 1, Census Tract 6631, Brazoria County, Texas | 74.5% |
| 480396631002 | Block Group 2, Census Tract 6631, Brazoria County, Texas | 23.0% |
| 480396631003 | Block Group 3, Census Tract 6631, Brazoria County, Texas | 0.0% |
| 480396631004 | Block Group 4, Census Tract 6631, Brazoria County, Texas | 7.3% |
| 480396632001 | Block Group 1, Census Tract 6632, Brazoria County, Texas | 42.4% |
| 480396632002 | Block Group 2, Census Tract 6632, Brazoria County, Texas | 53.4% |
| 480396632003 | Block Group 3, Census Tract 6632, Brazoria County, Texas | 11.1% |
| 480396633001 | Block Group 1, Census Tract 6633, Brazoria County, Texas | 60.8% |
| 480396633002 | Block Group 2, Census Tract 6633, Brazoria County, Texas | 32.6% |
| 480396633003 | Block Group 3, Census Tract 6633, Brazoria County, Texas | 45.9% |
| 480396634001 | Block Group 1, Census Tract 6634, Brazoria County, Texas | 29.1% |
| 480396634002 | Block Group 2, Census Tract 6634, Brazoria County, Texas | 40.2% |
| 480396634003 | Block Group 3, Census Tract 6634, Brazoria County, Texas | 38.0% |
| 480396634004 | Block Group 4, Census Tract 6634, Brazoria County, Texas | 21.5% |
| 480396635001 | Block Group 1, Census Tract 6635, Brazoria County, Texas | 40.1% |
| 480396635002 | Block Group 2, Census Tract 6635, Brazoria County, Texas | 66.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480396635003 | Block Group 3, Census Tract 6635, Brazoria County, Texas | 37.4% |
| 480396635004 | Block Group 4, Census Tract 6635, Brazoria County, Texas | 43.1% |
| 480396636001 | Block Group 1, Census Tract 6636, Brazoria County, Texas | 10.4% |
| 480396636002 | Block Group 2, Census Tract 6636, Brazoria County, Texas | 12.5% |
| 480396636003 | Block Group 3, Census Tract 6636, Brazoria County, Texas | 8.0% |
| 480396637001 | Block Group 1, Census Tract 6637, Brazoria County, Texas | 35.8% |
| 480396637002 | Block Group 2, Census Tract 6637, Brazoria County, Texas | 17.5% |
| 480396638001 | Block Group 1, Census Tract 6638, Brazoria County, Texas | 75.4% |
| 480396638002 | Block Group 2, Census Tract 6638, Brazoria County, Texas | 24.3% |
| 480396638003 | Block Group 3, Census Tract 6638, Brazoria County, Texas | 78.9% |
| 480396638004 | Block Group 4, Census Tract 6638, Brazoria County, Texas | 42.8% |
| 480396639001 | Block Group 1, Census Tract 6639, Brazoria County, Texas | 62.5% |
| 480396639002 | Block Group 2, Census Tract 6639, Brazoria County, Texas | 73.1% |
| 480396640001 | Block Group 1, Census Tract 6640, Brazoria County, Texas | 65.1% |
| 480396640002 | Block Group 2, Census Tract 6640, Brazoria County, Texas | 45.3% |
| 480396640003 | Block Group 3, Census Tract 6640, Brazoria County, Texas | 77.2% |
| 480396641001 | Block Group 1, Census Tract 6641, Brazoria County, Texas | 66.9% |
| 480396641002 | Block Group 2, Census Tract 6641, Brazoria County, Texas | 45.2% |
| 480396641003 | Block Group 3, Census Tract 6641, Brazoria County, Texas | 48.0% |
| 480396641004 | Block Group 4, Census Tract 6641, Brazoria County, Texas | 25.0% |
| 480396641005 | Block Group 5, Census Tract 6641, Brazoria County, Texas | 49.8% |
| 480396642001 | Block Group 1, Census Tract 6642, Brazoria County, Texas | 79.1% |
| 480396642002 | Block Group 2, Census Tract 6642, Brazoria County, Texas | 52.0% |
| 480396642003 | Block Group 3, Census Tract 6642, Brazoria County, Texas | 54.2% |
| 480396643001 | Block Group 1, Census Tract 6643, Brazoria County, Texas | 79.2% |
| 480396643002 | Block Group 2, Census Tract 6643, Brazoria County, Texas | 74.0% |
| 480396643003 | Block Group 3, Census Tract 6643, Brazoria County, Texas | 56.0% |
| 480396643004 | Block Group 4, Census Tract 6643, Brazoria County, Texas | 82.0% |
| 480396643005 | Block Group 5, Census Tract 6643, Brazoria County, Texas | 53.9% |
| 480396644001 | Block Group 1, Census Tract 6644, Brazoria County, Texas | 68.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480396644002 | Block Group 2, Census Tract 6644, Brazoria County, Texas | 37.0% |
| 480396644003 | Block Group 3, Census Tract 6644, Brazoria County, Texas | 63.9% |
| 480396644004 | Block Group 4, Census Tract 6644, Brazoria County, Texas | 78.5% |
| 480396644005 | Block Group 5, Census Tract 6644, Brazoria County, Texas | 67.3% |
| 480396644006 | Block Group 6, Census Tract 6644, Brazoria County, Texas | 51.7% |
| 480396645011 | Block Group 1, Census Tract 6645.01, Brazoria County, Texas | 59.7% |
| 480396645012 | Block Group 2, Census Tract 6645.01, Brazoria County, Texas | 42.9% |
| 480396645013 | Block Group 3, Census Tract 6645.01, Brazoria County, Texas | 85.3% |
| 480396645014 | Block Group 4, Census Tract 6645.01, Brazoria County, Texas | 39.6% |
| 480396645015 | Block Group 5, Census Tract 6645.01, Brazoria County, Texas | 42.5% |
| 480399900000 | Block Group 0, Census Tract 9900, Brazoria County, Texas | 0.0% |
| 480519701001 | Block Group 1, Census Tract 9701, Burleson County, Texas | 18.8% |
| 480519702001 | Block Group 1, Census Tract 9702, Burleson County, Texas | 28.3% |
| 480519702002 | Block Group 2, Census Tract 9702, Burleson County, Texas | 13.8% |
| 480519702003 | Block Group 3, Census Tract 9702, Burleson County, Texas | 24.3% |
| 480519702004 | Block Group 4, Census Tract 9702, Burleson County, Texas | 35.0% |
| 480519703001 | Block Group 1, Census Tract 9703, Burleson County, Texas | 28.8% |
| 480519703002 | Block Group 2, Census Tract 9703, Burleson County, Texas | 36.1% |
| 480519703003 | Block Group 3, Census Tract 9703, Burleson County, Texas | 52.5% |
| 480519704001 | Block Group 1, Census Tract 9704, Burleson County, Texas | 47.3% |
| 480519704002 | Block Group 2, Census Tract 9704, Burleson County, Texas | 48.2% |
| 480519705001 | Block Group 1, Census Tract 9705, Burleson County, Texas | 63.6% |
| 480519705002 | Block Group 2, Census Tract 9705, Burleson County, Texas | 32.4% |
| 480519705003 | Block Group 3, Census Tract 9705, Burleson County, Texas | 45.4% |
| 480519705004 | Block Group 4, Census Tract 9705, Burleson County, Texas | 46.2% |
| 480559601011 | Block Group 1, Census Tract 9601.01, Caldwell County, Texas | 43.1% |
| 480559601012 | Block Group 2, Census Tract 9601.01, Caldwell County, Texas | 46.9% |
| 480559601013 | Block Group 3, Census Tract 9601.01, Caldwell County, Texas | 47.7% |
| 480559601021 | Block Group 1, Census Tract 9601.02, Caldwell County, Texas | 43.8% |
| 480559601022 | Block Group 2, Census Tract 9601.02, Caldwell County, Texas | 37.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480559602001 | Block Group 1, Census Tract 9602, Caldwell County, Texas | 50.0% |
| 480559602002 | Block Group 2, Census Tract 9602, Caldwell County, Texas | 46.6% |
| 480559602003 | Block Group 3, Census Tract 9602, Caldwell County, Texas | 62.3% |
| 480559602004 | Block Group 4, Census Tract 9602, Caldwell County, Texas | 74.9% |
| 480559603001 | Block Group 1, Census Tract 9603, Caldwell County, Texas | 30.4% |
| 480559603002 | Block Group 2, Census Tract 9603, Caldwell County, Texas | 69.8% |
| 480559603003 | Block Group 3, Census Tract 9603, Caldwell County, Texas | 49.3% |
| 480559604001 | Block Group 1, Census Tract 9604, Caldwell County, Texas | 49.0% |
| 480559604002 | Block Group 2, Census Tract 9604, Caldwell County, Texas | 80.8% |
| 480559605001 | Block Group 1, Census Tract 9605, Caldwell County, Texas | 63.3% |
| 480559605002 | Block Group 2, Census Tract 9605, Caldwell County, Texas | 65.6% |
| 480559605003 | Block Group 3, Census Tract 9605, Caldwell County, Texas | 50.8% |
| 480559605004 | Block Group 4, Census Tract 9605, Caldwell County, Texas | 74.2% |
| 480559606001 | Block Group 1, Census Tract 9606, Caldwell County, Texas | 42.3% |
| 480559606002 | Block Group 2, Census Tract 9606, Caldwell County, Texas | 50.3% |
| 480559607001 | Block Group 1, Census Tract 9607, Caldwell County, Texas | 82.6% |
| 480559607002 | Block Group 2, Census Tract 9607, Caldwell County, Texas | 74.4% |
| 480559607003 | Block Group 3, Census Tract 9607, Caldwell County, Texas | 63.7% |
| 480559607004 | Block Group 4, Census Tract 9607, Caldwell County, Texas | 35.9% |
| 480559607005 | Block Group 5, Census Tract 9607, Caldwell County, Texas | 77.4% |
| 480570001001 | Block Group 1, Census Tract 1, Calhoun County, Texas | 17.3% |
| 480570001002 | Block Group 2, Census Tract 1, Calhoun County, Texas | 21.7% |
| 480570001003 | Block Group 3, Census Tract 1, Calhoun County, Texas | 74.4% |
| 480570002001 | Block Group 1, Census Tract 2, Calhoun County, Texas | 73.1% |
| 480570002002 | Block Group 2, Census Tract 2, Calhoun County, Texas | 43.4% |
| 480570002003 | Block Group 3, Census Tract 2, Calhoun County, Texas | 67.4% |
| 480570002004 | Block Group 4, Census Tract 2, Calhoun County, Texas | 20.1% |
| 480570003001 | Block Group 1, Census Tract 3, Calhoun County, Texas | 31.1% |
| 480570003002 | Block Group 2, Census Tract 3, Calhoun County, Texas | 30.0% |
| 480570004001 | Block Group 1, Census Tract 4, Calhoun County, Texas | 44.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480570004002 | Block Group 2, Census Tract 4, Calhoun County, Texas | 41.8% |
| 480570004003 | Block Group 3, Census Tract 4, Calhoun County, Texas | 28.9% |
| 480570004004 | Block Group 4, Census Tract 4, Calhoun County, Texas | 45.5% |
| 480570005001 | Block Group 1, Census Tract 5, Calhoun County, Texas | 36.4% |
| 480570005002 | Block Group 2, Census Tract 5, Calhoun County, Texas | 27.9% |
| 480570005003 | Block Group 3, Census Tract 5, Calhoun County, Texas | 40.4% |
| 480570005004 | Block Group 4, Census Tract 5, Calhoun County, Texas | 43.9% |
| 480579900000 | Block Group 0, Census Tract 9900, Calhoun County, Texas | 0.0% |
| 480717101001 | Block Group 1, Census Tract 7101, Chambers County, Texas | 41.1% |
| 480717101002 | Block Group 2, Census Tract 7101, Chambers County, Texas | 19.7% |
| 480717101003 | Block Group 3, Census Tract 7101, Chambers County, Texas | 26.4% |
| 480717102001 | Block Group 1, Census Tract 7102, Chambers County, Texas | 12.5% |
| 480717102002 | Block Group 2, Census Tract 7102, Chambers County, Texas | 27.1% |
| 480717102003 | Block Group 3, Census Tract 7102, Chambers County, Texas | 18.5% |
| 480717102004 | Block Group 4, Census Tract 7102, Chambers County, Texas | 37.3% |
| 480717102005 | Block Group 5, Census Tract 7102, Chambers County, Texas | 13.8% |
| 480717103001 | Block Group 1, Census Tract 7103, Chambers County, Texas | 28.1% |
| 480717103002 | Block Group 2, Census Tract 7103, Chambers County, Texas | 41.1% |
| 480717103003 | Block Group 3, Census Tract 7103, Chambers County, Texas | 65.1% |
| 480717104011 | Block Group 1, Census Tract 7104.01, Chambers County, Texas | 28.2% |
| 480717104012 | Block Group 2, Census Tract 7104.01, Chambers County, Texas | 34.1% |
| 480717104013 | Block Group 3, Census Tract 7104.01, Chambers County, Texas | 36.2% |
| 480717104014 | Block Group 4, Census Tract 7104.01, Chambers County, Texas | 37.7% |
| 480717105001 | Block Group 1, Census Tract 7105, Chambers County, Texas | 48.2% |
| 480717105002 | Block Group 2, Census Tract 7105, Chambers County, Texas | 56.9% |
| 480717105003 | Block Group 3, Census Tract 7105, Chambers County, Texas | 34.2% |
| 480717106001 | Block Group 1, Census Tract 7106, Chambers County, Texas | 0.0% |
| 480719900000 | Block Group 0, Census Tract 9900, Chambers County, Texas | 0.0% |
| 480897501001 | Block Group 1, Census Tract 7501, Colorado County, Texas | 88.6% |
| 480897501002 | Block Group 2, Census Tract 7501, Colorado County, Texas | 35.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480897501003 | Block Group 3, Census Tract 7501, Colorado County, Texas | 24.0% |
| 480897501004 | Block Group 4, Census Tract 7501, Colorado County, Texas | 41.3% |
| 480897502001 | Block Group 1, Census Tract 7502, Colorado County, Texas | 42.0% |
| 480897502002 | Block Group 2, Census Tract 7502, Colorado County, Texas | 50.8% |
| 480897503001 | Block Group 1, Census Tract 7503, Colorado County, Texas | 32.5% |
| 480897503002 | Block Group 2, Census Tract 7503, Colorado County, Texas | 37.0% |
| 480897503003 | Block Group 3, Census Tract 7503, Colorado County, Texas | 44.5% |
| 480897503004 | Block Group 4, Census Tract 7503, Colorado County, Texas | 41.6% |
| 480897504001 | Block Group 1, Census Tract 7504, Colorado County, Texas | 29.0% |
| 480897504002 | Block Group 2, Census Tract 7504, Colorado County, Texas | 22.2% |
| 480897504003 | Block Group 3, Census Tract 7504, Colorado County, Texas | 26.4% |
| 480897504004 | Block Group 4, Census Tract 7504, Colorado County, Texas | 30.8% |
| 480897505001 | Block Group 1, Census Tract 7505, Colorado County, Texas | 42.7% |
| 480897505002 | Block Group 2, Census Tract 7505, Colorado County, Texas | 29.1% |
| 480897505003 | Block Group 3, Census Tract 7505, Colorado County, Texas | 51.5% |
| 480897505004 | Block Group 4, Census Tract 7505, Colorado County, Texas | 55.9% |
| 480913101001 | Block Group 1, Census Tract 3101, Comal County, Texas | 38.3% |
| 480913101002 | Block Group 2, Census Tract 3101, Comal County, Texas | 43.9% |
| 480913101003 | Block Group 3, Census Tract 3101, Comal County, Texas | 50.0% |
| 480913101004 | Block Group 4, Census Tract 3101, Comal County, Texas | 52.3% |
| 480913102001 | Block Group 1, Census Tract 3102, Comal County, Texas | 40.2% |
| 480913102002 | Block Group 2, Census Tract 3102, Comal County, Texas | 22.9% |
| 480913102003 | Block Group 3, Census Tract 3102, Comal County, Texas | 21.1% |
| 480913103001 | Block Group 1, Census Tract 3103, Comal County, Texas | 8.8% |
| 480913103002 | Block Group 2, Census Tract 3103, Comal County, Texas | 26.5% |
| 480913103003 | Block Group 3, Census Tract 3103, Comal County, Texas | 45.1% |
| 480913103004 | Block Group 4, Census Tract 3103, Comal County, Texas | 38.4% |
| 480913104011 | Block Group 1, Census Tract 3104.01, Comal County, Texas | 50.9% |
| 480913104012 | Block Group 2, Census Tract 3104.01, Comal County, Texas | 82.5% |
| 480913104013 | Block Group 3, Census Tract 3104.01, Comal County, Texas | 62.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480913104014 | Block Group 4, Census Tract 3104.01, Comal County, Texas | 64.9% |
| 480913104015 | Block Group 5, Census Tract 3104.01, Comal County, Texas | 54.2% |
| 480913104016 | Block Group 6, Census Tract 3104.01, Comal County, Texas | 53.8% |
| 480913104031 | Block Group 1, Census Tract 3104.03, Comal County, Texas | 11.9% |
| 480913104032 | Block Group 2, Census Tract 3104.03, Comal County, Texas | 62.0% |
| 480913104033 | Block Group 3, Census Tract 3104.03, Comal County, Texas | 39.9% |
| 480913104041 | Block Group 1, Census Tract 3104.04, Comal County, Texas | 37.4% |
| 480913104042 | Block Group 2, Census Tract 3104.04, Comal County, Texas | 33.3% |
| 480913105011 | Block Group 1, Census Tract 3105.01, Comal County, Texas | 60.4% |
| 480913105012 | Block Group 2, Census Tract 3105.01, Comal County, Texas | 49.1% |
| 480913105021 | Block Group 1, Census Tract 3105.02, Comal County, Texas | 42.4% |
| 480913105022 | Block Group 2, Census Tract 3105.02, Comal County, Texas | 41.7% |
| 480913105031 | Block Group 1, Census Tract 3105.03, Comal County, Texas | 17.2% |
| 480913105032 | Block Group 2, Census Tract 3105.03, Comal County, Texas | 19.4% |
| 480913106031 | Block Group 1, Census Tract 3106.03, Comal County, Texas | 21.5% |
| 480913106032 | Block Group 2, Census Tract 3106.03, Comal County, Texas | 12.4% |
| 480913106041 | Block Group 1, Census Tract 3106.04, Comal County, Texas | 16.9% |
| 480913106042 | Block Group 2, Census Tract 3106.04, Comal County, Texas | 31.4% |
| 480913106051 | Block Group 1, Census Tract 3106.05, Comal County, Texas | 53.6% |
| 480913106052 | Block Group 2, Census Tract 3106.05, Comal County, Texas | 23.2% |
| 480913106061 | Block Group 1, Census Tract 3106.06, Comal County, Texas | 19.1% |
| 480913106062 | Block Group 2, Census Tract 3106.06, Comal County, Texas | 28.3% |
| 480913106071 | Block Group 1, Census Tract 3106.07, Comal County, Texas | 18.9% |
| 480913106072 | Block Group 2, Census Tract 3106.07, Comal County, Texas | 20.9% |
| 480913106073 | Block Group 3, Census Tract 3106.07, Comal County, Texas | 33.1% |
| 480913106081 | Block Group 1, Census Tract 3106.08, Comal County, Texas | 57.4% |
| 480913106082 | Block Group 2, Census Tract 3106.08, Comal County, Texas | 56.6% |
| 480913107011 | Block Group 1, Census Tract 3107.01, Comal County, Texas | 6.8% |
| 480913107012 | Block Group 2, Census Tract 3107.01, Comal County, Texas | 12.5% |
| 480913107013 | Block Group 3, Census Tract 3107.01, Comal County, Texas | 6.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 480913107021 | Block Group 1, Census Tract 3107.02, Comal County, Texas | 13.6% |
| 480913107022 | Block Group 2, Census Tract 3107.02, Comal County, Texas | 15.5% |
| 480913107031 | Block Group 1, Census Tract 3107.03, Comal County, Texas | 23.1% |
| 480913107032 | Block Group 2, Census Tract 3107.03, Comal County, Texas | 9.9% |
| 480913107033 | Block Group 3, Census Tract 3107.03, Comal County, Texas | 23.1% |
| 480913107041 | Block Group 1, Census Tract 3107.04, Comal County, Texas | 7.2% |
| 480913107042 | Block Group 2, Census Tract 3107.04, Comal County, Texas | 31.0% |
| 480913107043 | Block Group 3, Census Tract 3107.04, Comal County, Texas | 33.0% |
| 480913107044 | Block Group 4, Census Tract 3107.04, Comal County, Texas | 31.7% |
| 480913108011 | Block Group 1, Census Tract 3108.01, Comal County, Texas | 10.0% |
| 480913108012 | Block Group 2, Census Tract 3108.01, Comal County, Texas | 4.0% |
| 480913108013 | Block Group 3, Census Tract 3108.01, Comal County, Texas | 5.3% |
| 480913108021 | Block Group 1, Census Tract 3108.02, Comal County, Texas | 14.6% |
| 480913108022 | Block Group 2, Census Tract 3108.02, Comal County, Texas | 49.6% |
| 480913109011 | Block Group 1, Census Tract 3109.01, Comal County, Texas | 9.9% |
| 480913109012 | Block Group 2, Census Tract 3109.01, Comal County, Texas | 13.0% |
| 480913109021 | Block Group 1, Census Tract 3109.02, Comal County, Texas | 27.9% |
| 480913109022 | Block Group 2, Census Tract 3109.02, Comal County, Texas | 16.3% |
| 480913109031 | Block Group 1, Census Tract 3109.03, Comal County, Texas | 11.8% |
| 480913109032 | Block Group 2, Census Tract 3109.03, Comal County, Texas | 13.4% |
| 481239701001 | Block Group 1, Census Tract 9701, DeWitt County, Texas | 43.5% |
| 481239701002 | Block Group 2, Census Tract 9701, DeWitt County, Texas | 40.8% |
| 481239701003 | Block Group 3, Census Tract 9701, DeWitt County, Texas | 56.5% |
| 481239702001 | Block Group 1, Census Tract 9702, DeWitt County, Texas | 40.7% |
| 481239702002 | Block Group 2, Census Tract 9702, DeWitt County, Texas | 47.4% |
| 481239702003 | Block Group 3, Census Tract 9702, DeWitt County, Texas | 47.1% |
| 481239702004 | Block Group 4, Census Tract 9702, DeWitt County, Texas | 70.5% |
| 481239703001 | Block Group 1, Census Tract 9703, DeWitt County, Texas | 40.1% |
| 481239703002 | Block Group 2, Census Tract 9703, DeWitt County, Texas | 31.4% |
| 481239703003 | Block Group 3, Census Tract 9703, DeWitt County, Texas | 37.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481239703004 | Block Group 4, Census Tract 9703, DeWitt County, Texas | 18.1% |
| 481239704001 | Block Group 1, Census Tract 9704, DeWitt County, Texas | 31.6% |
| 481239704002 | Block Group 2, Census Tract 9704, DeWitt County, Texas | 28.3% |
| 481239704003 | Block Group 3, Census Tract 9704, DeWitt County, Texas | 43.1% |
| 481239705001 | Block Group 1, Census Tract 9705, DeWitt County, Texas | 21.0% |
| 481239705002 | Block Group 2, Census Tract 9705, DeWitt County, Texas | 43.9% |
| 481239705003 | Block Group 3, Census Tract 9705, DeWitt County, Texas | 35.8% |
| 481499701001 | Block Group 1, Census Tract 9701, Fayette County, Texas | 23.4% |
| 481499701002 | Block Group 2, Census Tract 9701, Fayette County, Texas | 35.2% |
| 481499702001 | Block Group 1, Census Tract 9702, Fayette County, Texas | 30.7% |
| 481499702002 | Block Group 2, Census Tract 9702, Fayette County, Texas | 11.3% |
| 481499702003 | Block Group 3, Census Tract 9702, Fayette County, Texas | 25.2% |
| 481499703001 | Block Group 1, Census Tract 9703, Fayette County, Texas | 46.4% |
| 481499703002 | Block Group 2, Census Tract 9703, Fayette County, Texas | 49.3% |
| 481499703003 | Block Group 3, Census Tract 9703, Fayette County, Texas | 46.0% |
| 481499703004 | Block Group 4, Census Tract 9703, Fayette County, Texas | 62.0% |
| 481499703005 | Block Group 5, Census Tract 9703, Fayette County, Texas | 55.0% |
| 481499703006 | Block Group 6, Census Tract 9703, Fayette County, Texas | 72.5% |
| 481499703007 | Block Group 7, Census Tract 9703, Fayette County, Texas | 31.3% |
| 481499704001 | Block Group 1, Census Tract 9704, Fayette County, Texas | 16.5% |
| 481499704002 | Block Group 2, Census Tract 9704, Fayette County, Texas | 18.7% |
| 481499704003 | Block Group 3, Census Tract 9704, Fayette County, Texas | 38.7% |
| 481499705001 | Block Group 1, Census Tract 9705, Fayette County, Texas | 17.4% |
| 481499705002 | Block Group 2, Census Tract 9705, Fayette County, Texas | 10.8% |
| 481499705003 | Block Group 3, Census Tract 9705, Fayette County, Texas | 56.6% |
| 481499706001 | Block Group 1, Census Tract 9706, Fayette County, Texas | 47.4% |
| 481499706002 | Block Group 2, Census Tract 9706, Fayette County, Texas | 35.9% |
| 481499706003 | Block Group 3, Census Tract 9706, Fayette County, Texas | 60.1% |
| 481499706004 | Block Group 4, Census Tract 9706, Fayette County, Texas | 83.9% |
| 481499706005 | Block Group 5, Census Tract 9706, Fayette County, Texas | 54.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481499707001 | Block Group 1, Census Tract 9707, Fayette County, Texas | 32.2% |
| 481499707002 | Block Group 2, Census Tract 9707, Fayette County, Texas | 34.4% |
| 481576701011 | Block Group 1, Census Tract 6701.01, Fort Bend County, Texas | 48.6% |
| 481576701012 | Block Group 2, Census Tract 6701.01, Fort Bend County, Texas | 73.5% |
| 481576701013 | Block Group 3, Census Tract 6701.01, Fort Bend County, Texas | 68.1% |
| 481576701014 | Block Group 4, Census Tract 6701.01, Fort Bend County, Texas | 33.5% |
| 481576701021 | Block Group 1, Census Tract 6701.02, Fort Bend County, Texas | 73.1% |
| 481576701022 | Block Group 2, Census Tract 6701.02, Fort Bend County, Texas | 19.3% |
| 481576702001 | Block Group 1, Census Tract 6702, Fort Bend County, Texas | 29.6% |
| 481576702002 | Block Group 2, Census Tract 6702, Fort Bend County, Texas | 54.7% |
| 481576702003 | Block Group 3, Census Tract 6702, Fort Bend County, Texas | 72.1% |
| 481576702004 | Block Group 4, Census Tract 6702, Fort Bend County, Texas | 42.9% |
| 481576702005 | Block Group 5, Census Tract 6702, Fort Bend County, Texas | 38.2% |
| 481576703001 | Block Group 1, Census Tract 6703, Fort Bend County, Texas | 51.1% |
| 481576703002 | Block Group 2, Census Tract 6703, Fort Bend County, Texas | 36.2% |
| 481576704001 | Block Group 1, Census Tract 6704, Fort Bend County, Texas | 50.2% |
| 481576704002 | Block Group 2, Census Tract 6704, Fort Bend County, Texas | 36.1% |
| 481576704003 | Block Group 3, Census Tract 6704, Fort Bend County, Texas | 42.5% |
| 481576705001 | Block Group 1, Census Tract 6705, Fort Bend County, Texas | 26.9% |
| 481576705002 | Block Group 2, Census Tract 6705, Fort Bend County, Texas | 48.9% |
| 481576706011 | Block Group 1, Census Tract 6706.01, Fort Bend County, Texas | 19.9% |
| 481576706012 | Block Group 2, Census Tract 6706.01, Fort Bend County, Texas | 31.2% |
| 481576706013 | Block Group 3, Census Tract 6706.01, Fort Bend County, Texas | 41.3% |
| 481576706014 | Block Group 4, Census Tract 6706.01, Fort Bend County, Texas | 12.8% |
| 481576706021 | Block Group 1, Census Tract 6706.02, Fort Bend County, Texas | 44.1% |
| 481576707001 | Block Group 1, Census Tract 6707, Fort Bend County, Texas | 37.6% |
| 481576707002 | Block Group 2, Census Tract 6707, Fort Bend County, Texas | 37.3% |
| 481576708001 | Block Group 1, Census Tract 6708, Fort Bend County, Texas | 19.4% |
| 481576708002 | Block Group 2, Census Tract 6708, Fort Bend County, Texas | 67.4% |
| 481576708003 | Block Group 3, Census Tract 6708, Fort Bend County, Texas | 31.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481576709011 | Block Group 1, Census Tract 6709.01, Fort Bend County, Texas | 2.7% |
| 481576709012 | Block Group 2, Census Tract 6709.01, Fort Bend County, Texas | 19.8% |
| 481576709013 | Block Group 3, Census Tract 6709.01, Fort Bend County, Texas | 14.9% |
| 481576709021 | Block Group 1, Census Tract 6709.02, Fort Bend County, Texas | 22.9% |
| 481576709022 | Block Group 2, Census Tract 6709.02, Fort Bend County, Texas | 29.3% |
| 481576710011 | Block Group 1, Census Tract 6710.01, Fort Bend County, Texas | 23.6% |
| 481576710012 | Block Group 2, Census Tract 6710.01, Fort Bend County, Texas | 29.3% |
| 481576710013 | Block Group 3, Census Tract 6710.01, Fort Bend County, Texas | 16.3% |
| 481576710014 | Block Group 4, Census Tract 6710.01, Fort Bend County, Texas | 12.1% |
| 481576710021 | Block Group 1, Census Tract 6710.02, Fort Bend County, Texas | 16.2% |
| 481576710022 | Block Group 2, Census Tract 6710.02, Fort Bend County, Texas | 3.5% |
| 481576710023 | Block Group 3, Census Tract 6710.02, Fort Bend County, Texas | 30.6% |
| 481576710024 | Block Group 4, Census Tract 6710.02, Fort Bend County, Texas | 25.3% |
| 481576711001 | Block Group 1, Census Tract 6711, Fort Bend County, Texas | 54.8% |
| 481576711002 | Block Group 2, Census Tract 6711, Fort Bend County, Texas | 57.1% |
| 481576711003 | Block Group 3, Census Tract 6711, Fort Bend County, Texas | 72.9% |
| 481576711004 | Block Group 4, Census Tract 6711, Fort Bend County, Texas | 26.3% |
| 481576712001 | Block Group 1, Census Tract 6712, Fort Bend County, Texas | 37.4% |
| 481576712002 | Block Group 2, Census Tract 6712, Fort Bend County, Texas | 52.5% |
| 481576713001 | Block Group 1, Census Tract 6713, Fort Bend County, Texas | 66.2% |
| 481576713002 | Block Group 2, Census Tract 6713, Fort Bend County, Texas | 42.5% |
| 481576714001 | Block Group 1, Census Tract 6714, Fort Bend County, Texas | 41.8% |
| 481576714002 | Block Group 2, Census Tract 6714, Fort Bend County, Texas | 35.7% |
| 481576715011 | Block Group 1, Census Tract 6715.01, Fort Bend County, Texas | 24.0% |
| 481576715012 | Block Group 2, Census Tract 6715.01, Fort Bend County, Texas | 8.7% |
| 481576715013 | Block Group 3, Census Tract 6715.01, Fort Bend County, Texas | 6.0% |
| 481576715014 | Block Group 4, Census Tract 6715.01, Fort Bend County, Texas | 11.3% |
| 481576715021 | Block Group 1, Census Tract 6715.02, Fort Bend County, Texas | 39.4% |
| 481576716011 | Block Group 1, Census Tract 6716.01, Fort Bend County, Texas | 37.4% |
| 481576716012 | Block Group 2, Census Tract 6716.01, Fort Bend County, Texas | 35.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481576716013 | Block Group 3, Census Tract 6716.01, Fort Bend County, Texas | 1.9% |
| 481576716014 | Block Group 4, Census Tract 6716.01, Fort Bend County, Texas | 17.3% |
| 481576716021 | Block Group 1, Census Tract 6716.02, Fort Bend County, Texas | 17.2% |
| 481576716022 | Block Group 2, Census Tract 6716.02, Fort Bend County, Texas | 7.7% |
| 481576717001 | Block Group 1, Census Tract 6717, Fort Bend County, Texas | 19.9% |
| 481576717002 | Block Group 2, Census Tract 6717, Fort Bend County, Texas | 10.0% |
| 481576717003 | Block Group 3, Census Tract 6717, Fort Bend County, Texas | 16.2% |
| 481576718001 | Block Group 1, Census Tract 6718, Fort Bend County, Texas | 33.4% |
| 481576718002 | Block Group 2, Census Tract 6718, Fort Bend County, Texas | 18.1% |
| 481576719001 | Block Group 1, Census Tract 6719, Fort Bend County, Texas | 12.4% |
| 481576719002 | Block Group 2, Census Tract 6719, Fort Bend County, Texas | 17.8% |
| 481576719003 | Block Group 3, Census Tract 6719, Fort Bend County, Texas | 32.9% |
| 481576720011 | Block Group 1, Census Tract 6720.01, Fort Bend County, Texas | 30.9% |
| 481576720012 | Block Group 2, Census Tract 6720.01, Fort Bend County, Texas | 15.9% |
| 481576720013 | Block Group 3, Census Tract 6720.01, Fort Bend County, Texas | 67.3% |
| 481576720014 | Block Group 4, Census Tract 6720.01, Fort Bend County, Texas | 42.3% |
| 481576720021 | Block Group 1, Census Tract 6720.02, Fort Bend County, Texas | 37.8% |
| 481576720022 | Block Group 2, Census Tract 6720.02, Fort Bend County, Texas | 45.6% |
| 481576720023 | Block Group 3, Census Tract 6720.02, Fort Bend County, Texas | 20.3% |
| 481576721001 | Block Group 1, Census Tract 6721, Fort Bend County, Texas | 3.6% |
| 481576721002 | Block Group 2, Census Tract 6721, Fort Bend County, Texas | 24.8% |
| 481576722001 | Block Group 1, Census Tract 6722, Fort Bend County, Texas | 4.5% |
| 481576722002 | Block Group 2, Census Tract 6722, Fort Bend County, Texas | 37.2% |
| 481576723011 | Block Group 1, Census Tract 6723.01, Fort Bend County, Texas | 31.2% |
| 481576723021 | Block Group 1, Census Tract 6723.02, Fort Bend County, Texas | 20.9% |
| 481576723022 | Block Group 2, Census Tract 6723.02, Fort Bend County, Texas | 25.4% |
| 481576723023 | Block Group 3, Census Tract 6723.02, Fort Bend County, Texas | 12.1% |
| 481576723024 | Block Group 4, Census Tract 6723.02, Fort Bend County, Texas | 21.9% |
| 481576724001 | Block Group 1, Census Tract 6724, Fort Bend County, Texas | 32.0% |
| 481576724002 | Block Group 2, Census Tract 6724, Fort Bend County, Texas | 49.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481576724003 | Block Group 3, Census Tract 6724, Fort Bend County, Texas | 50.3% |
| 481576724004 | Block Group 4, Census Tract 6724, Fort Bend County, Texas | 22.3% |
| 481576725001 | Block Group 1, Census Tract 6725, Fort Bend County, Texas | 62.3% |
| 481576725002 | Block Group 2, Census Tract 6725, Fort Bend County, Texas | 25.7% |
| 481576725003 | Block Group 3, Census Tract 6725, Fort Bend County, Texas | 18.5% |
| 481576726011 | Block Group 1, Census Tract 6726.01, Fort Bend County, Texas | 49.3% |
| 481576726012 | Block Group 2, Census Tract 6726.01, Fort Bend County, Texas | 40.9% |
| 481576726013 | Block Group 3, Census Tract 6726.01, Fort Bend County, Texas | 34.8% |
| 481576726014 | Block Group 4, Census Tract 6726.01, Fort Bend County, Texas | 28.6% |
| 481576726015 | Block Group 5, Census Tract 6726.01, Fort Bend County, Texas | 55.2% |
| 481576726021 | Block Group 1, Census Tract 6726.02, Fort Bend County, Texas | 21.0% |
| 481576726022 | Block Group 2, Census Tract 6726.02, Fort Bend County, Texas | 20.3% |
| 481576727011 | Block Group 1, Census Tract 6727.01, Fort Bend County, Texas | 34.7% |
| 481576727012 | Block Group 2, Census Tract 6727.01, Fort Bend County, Texas | 32.5% |
| 481576727013 | Block Group 3, Census Tract 6727.01, Fort Bend County, Texas | 33.2% |
| 481576727021 | Block Group 1, Census Tract 6727.02, Fort Bend County, Texas | 10.5% |
| 481576727022 | Block Group 2, Census Tract 6727.02, Fort Bend County, Texas | 20.3% |
| 481576728001 | Block Group 1, Census Tract 6728, Fort Bend County, Texas | 34.3% |
| 481576729001 | Block Group 1, Census Tract 6729, Fort Bend County, Texas | 27.3% |
| 481576730011 | Block Group 1, Census Tract 6730.01, Fort Bend County, Texas | 7.4% |
| 481576730012 | Block Group 2, Census Tract 6730.01, Fort Bend County, Texas | 7.8% |
| 481576730013 | Block Group 3, Census Tract 6730.01, Fort Bend County, Texas | 5.7% |
| 481576730021 | Block Group 1, Census Tract 6730.02, Fort Bend County, Texas | 10.4% |
| 481576730022 | Block Group 2, Census Tract 6730.02, Fort Bend County, Texas | 4.6% |
| 481576730031 | Block Group 1, Census Tract 6730.03, Fort Bend County, Texas | 3.9% |
| 481576730032 | Block Group 2, Census Tract 6730.03, Fort Bend County, Texas | 9.7% |
| 481576731011 | Block Group 1, Census Tract 6731.01, Fort Bend County, Texas | 9.3% |
| 481576731012 | Block Group 2, Census Tract 6731.01, Fort Bend County, Texas | 13.2% |
| 481576731013 | Block Group 3, Census Tract 6731.01, Fort Bend County, Texas | 14.5% |
| 481576731021 | Block Group 1, Census Tract 6731.02, Fort Bend County, Texas | 6.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481576731022 | Block Group 2, Census Tract 6731.02, Fort Bend County, Texas | 6.4% |
| 481576732001 | Block Group 1, Census Tract 6732, Fort Bend County, Texas | 26.0% |
| 481576732002 | Block Group 2, Census Tract 6732, Fort Bend County, Texas | 24.6% |
| 481576733001 | Block Group 1, Census Tract 6733, Fort Bend County, Texas | 9.6% |
| 481576733002 | Block Group 2, Census Tract 6733, Fort Bend County, Texas | 9.5% |
| 481576734001 | Block Group 1, Census Tract 6734, Fort Bend County, Texas | 13.7% |
| 481576734002 | Block Group 2, Census Tract 6734, Fort Bend County, Texas | 21.5% |
| 481576735001 | Block Group 1, Census Tract 6735, Fort Bend County, Texas | 9.5% |
| 481576735002 | Block Group 2, Census Tract 6735, Fort Bend County, Texas | 32.4% |
| 481576735003 | Block Group 3, Census Tract 6735, Fort Bend County, Texas | 6.0% |
| 481576736001 | Block Group 1, Census Tract 6736, Fort Bend County, Texas | 22.7% |
| 481576736002 | Block Group 2, Census Tract 6736, Fort Bend County, Texas | 7.3% |
| 481576736003 | Block Group 3, Census Tract 6736, Fort Bend County, Texas | 31.0% |
| 481576736004 | Block Group 4, Census Tract 6736, Fort Bend County, Texas | 4.6% |
| 481576737001 | Block Group 1, Census Tract 6737, Fort Bend County, Texas | 0.0% |
| 481576738001 | Block Group 1, Census Tract 6738, Fort Bend County, Texas | 29.2% |
| 481576738002 | Block Group 2, Census Tract 6738, Fort Bend County, Texas | 22.9% |
| 481576738003 | Block Group 3, Census Tract 6738, Fort Bend County, Texas | 26.5% |
| 481576738004 | Block Group 4, Census Tract 6738, Fort Bend County, Texas | 40.5% |
| 481576739011 | Block Group 1, Census Tract 6739.01, Fort Bend County, Texas | 0.5% |
| 481576739012 | Block Group 2, Census Tract 6739.01, Fort Bend County, Texas | 3.2% |
| 481576739013 | Block Group 3, Census Tract 6739.01, Fort Bend County, Texas | 2.5% |
| 481576739014 | Block Group 4, Census Tract 6739.01, Fort Bend County, Texas | 5.8% |
| 481576739021 | Block Group 1, Census Tract 6739.02, Fort Bend County, Texas | 6.8% |
| 481576739022 | Block Group 2, Census Tract 6739.02, Fort Bend County, Texas | 27.0% |
| 481576740001 | Block Group 1, Census Tract 6740, Fort Bend County, Texas | 17.7% |
| 481576740002 | Block Group 2, Census Tract 6740, Fort Bend County, Texas | 38.8% |
| 481576740003 | Block Group 3, Census Tract 6740, Fort Bend County, Texas | 13.6% |
| 481576741001 | Block Group 1, Census Tract 6741, Fort Bend County, Texas | 17.9% |
| 481576741002 | Block Group 2, Census Tract 6741, Fort Bend County, Texas | 12.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481576741003 | Block Group 3, Census Tract 6741, Fort Bend County, Texas | 14.3% |
| 481576741004 | Block Group 4, Census Tract 6741, Fort Bend County, Texas | 13.9% |
| 481576742001 | Block Group 1, Census Tract 6742, Fort Bend County, Texas | 0.7% |
| 481576742002 | Block Group 2, Census Tract 6742, Fort Bend County, Texas | 19.6% |
| 481576742003 | Block Group 3, Census Tract 6742, Fort Bend County, Texas | 4.1% |
| 481576742004 | Block Group 4, Census Tract 6742, Fort Bend County, Texas | 9.1% |
| 481576743001 | Block Group 1, Census Tract 6743, Fort Bend County, Texas | 33.2% |
| 481576743002 | Block Group 2, Census Tract 6743, Fort Bend County, Texas | 6.3% |
| 481576743003 | Block Group 3, Census Tract 6743, Fort Bend County, Texas | 7.0% |
| 481576744001 | Block Group 1, Census Tract 6744, Fort Bend County, Texas | 7.1% |
| 481576744002 | Block Group 2, Census Tract 6744, Fort Bend County, Texas | 5.2% |
| 481576744003 | Block Group 3, Census Tract 6744, Fort Bend County, Texas | 3.6% |
| 481576745011 | Block Group 1, Census Tract 6745.01, Fort Bend County, Texas | 7.0% |
| 481576745021 | Block Group 1, Census Tract 6745.02, Fort Bend County, Texas | 20.0% |
| 481576745022 | Block Group 2, Census Tract 6745.02, Fort Bend County, Texas | 4.5% |
| 481576746011 | Block Group 1, Census Tract 6746.01, Fort Bend County, Texas | 7.8% |
| 481576746012 | Block Group 2, Census Tract 6746.01, Fort Bend County, Texas | 24.7% |
| 481576746021 | Block Group 1, Census Tract 6746.02, Fort Bend County, Texas | 14.8% |
| 481576746022 | Block Group 2, Census Tract 6746.02, Fort Bend County, Texas | 2.8% |
| 481576746031 | Block Group 1, Census Tract 6746.03, Fort Bend County, Texas | 5.7% |
| 481576746032 | Block Group 2, Census Tract 6746.03, Fort Bend County, Texas | 18.2% |
| 481576746033 | Block Group 3, Census Tract 6746.03, Fort Bend County, Texas | 30.1% |
| 481576746041 | Block Group 1, Census Tract 6746.04, Fort Bend County, Texas | 15.4% |
| 481576747001 | Block Group 1, Census Tract 6747, Fort Bend County, Texas | 11.8% |
| 481576747002 | Block Group 2, Census Tract 6747, Fort Bend County, Texas | 79.6% |
| 481576747003 | Block Group 3, Census Tract 6747, Fort Bend County, Texas | 31.2% |
| 481576748001 | Block Group 1, Census Tract 6748, Fort Bend County, Texas | 79.6% |
| 481576748002 | Block Group 2, Census Tract 6748, Fort Bend County, Texas | 65.6% |
| 481576748003 | Block Group 3, Census Tract 6748, Fort Bend County, Texas | 14.1% |
| 481576748004 | Block Group 4, Census Tract 6748, Fort Bend County, Texas | 77.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481576748005 | Block Group 5, Census Tract 6748, Fort Bend County, Texas | 50.2% |
| 481576749001 | Block Group 1, Census Tract 6749, Fort Bend County, Texas | 66.0% |
| 481576749002 | Block Group 2, Census Tract 6749, Fort Bend County, Texas | 70.7% |
| 481576749003 | Block Group 3, Census Tract 6749, Fort Bend County, Texas | 50.8% |
| 481576749004 | Block Group 4, Census Tract 6749, Fort Bend County, Texas | 64.2% |
| 481576750001 | Block Group 1, Census Tract 6750, Fort Bend County, Texas | 67.4% |
| 481576750002 | Block Group 2, Census Tract 6750, Fort Bend County, Texas | 72.4% |
| 481576751001 | Block Group 1, Census Tract 6751, Fort Bend County, Texas | 25.7% |
| 481576751002 | Block Group 2, Census Tract 6751, Fort Bend County, Texas | 50.6% |
| 481576751003 | Block Group 3, Census Tract 6751, Fort Bend County, Texas | 29.4% |
| 481576751004 | Block Group 4, Census Tract 6751, Fort Bend County, Texas | 29.8% |
| 481576752001 | Block Group 1, Census Tract 6752, Fort Bend County, Texas | 77.7% |
| 481576752002 | Block Group 2, Census Tract 6752, Fort Bend County, Texas | 49.5% |
| 481576752003 | Block Group 3, Census Tract 6752, Fort Bend County, Texas | 51.3% |
| 481576752004 | Block Group 4, Census Tract 6752, Fort Bend County, Texas | 27.1% |
| 481576753001 | Block Group 1, Census Tract 6753, Fort Bend County, Texas | 45.6% |
| 481576753002 | Block Group 2, Census Tract 6753, Fort Bend County, Texas | 32.5% |
| 481576753003 | Block Group 3, Census Tract 6753, Fort Bend County, Texas | 91.3% |
| 481576753004 | Block Group 4, Census Tract 6753, Fort Bend County, Texas | 73.0% |
| 481576754001 | Block Group 1, Census Tract 6754, Fort Bend County, Texas | 62.5% |
| 481576754002 | Block Group 2, Census Tract 6754, Fort Bend County, Texas | 48.6% |
| 481576755001 | Block Group 1, Census Tract 6755, Fort Bend County, Texas | 18.1% |
| 481576755002 | Block Group 2, Census Tract 6755, Fort Bend County, Texas | 58.9% |
| 481576756001 | Block Group 1, Census Tract 6756, Fort Bend County, Texas | 35.9% |
| 481576756002 | Block Group 2, Census Tract 6756, Fort Bend County, Texas | 41.0% |
| 481576757001 | Block Group 1, Census Tract 6757, Fort Bend County, Texas | 32.9% |
| 481576757002 | Block Group 2, Census Tract 6757, Fort Bend County, Texas | 43.0% |
| 481576757003 | Block Group 3, Census Tract 6757, Fort Bend County, Texas | 32.2% |
| 481576758001 | Block Group 1, Census Tract 6758, Fort Bend County, Texas | 24.4% |
| 481576758002 | Block Group 2, Census Tract 6758, Fort Bend County, Texas | 39.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481576758003 | Block Group 3, Census Tract 6758, Fort Bend County, Texas | 60.2% |
| 481677201001 | Block Group 1, Census Tract 7201, Galveston County, Texas | 4.0% |
| 481677201002 | Block Group 2, Census Tract 7201, Galveston County, Texas | 46.6% |
| 481677201003 | Block Group 3, Census Tract 7201, Galveston County, Texas | 27.8% |
| 481677202001 | Block Group 1, Census Tract 7202, Galveston County, Texas | 2.2% |
| 481677202002 | Block Group 2, Census Tract 7202, Galveston County, Texas | 14.7% |
| 481677202003 | Block Group 3, Census Tract 7202, Galveston County, Texas | 42.6% |
| 481677203011 | Block Group 1, Census Tract 7203.01, Galveston County, Texas | 35.9% |
| 481677203012 | Block Group 2, Census Tract 7203.01, Galveston County, Texas | 31.8% |
| 481677203021 | Block Group 1, Census Tract 7203.02, Galveston County, Texas | 3.0% |
| 481677203022 | Block Group 2, Census Tract 7203.02, Galveston County, Texas | 12.9% |
| 481677203023 | Block Group 3, Census Tract 7203.02, Galveston County, Texas | 2.4% |
| 481677204001 | Block Group 1, Census Tract 7204, Galveston County, Texas | 1.6% |
| 481677204002 | Block Group 2, Census Tract 7204, Galveston County, Texas | 3.3% |
| 481677205011 | Block Group 1, Census Tract 7205.01, Galveston County, Texas | 3.2% |
| 481677205012 | Block Group 2, Census Tract 7205.01, Galveston County, Texas | 6.6% |
| 481677205021 | Block Group 1, Census Tract 7205.02, Galveston County, Texas | 45.6% |
| 481677205022 | Block Group 2, Census Tract 7205.02, Galveston County, Texas | 15.4% |
| 481677205023 | Block Group 3, Census Tract 7205.02, Galveston County, Texas | 52.2% |
| 481677205031 | Block Group 1, Census Tract 7205.03, Galveston County, Texas | 4.9% |
| 481677205032 | Block Group 2, Census Tract 7205.03, Galveston County, Texas | 18.1% |
| 481677205033 | Block Group 3, Census Tract 7205.03, Galveston County, Texas | 14.4% |
| 481677206001 | Block Group 1, Census Tract 7206, Galveston County, Texas | 16.4% |
| 481677206002 | Block Group 2, Census Tract 7206, Galveston County, Texas | 17.2% |
| 481677207001 | Block Group 1, Census Tract 7207, Galveston County, Texas | 15.7% |
| 481677207002 | Block Group 2, Census Tract 7207, Galveston County, Texas | 18.3% |
| 481677207003 | Block Group 3, Census Tract 7207, Galveston County, Texas | 29.0% |
| 481677208001 | Block Group 1, Census Tract 7208, Galveston County, Texas | 77.7% |
| 481677208002 | Block Group 2, Census Tract 7208, Galveston County, Texas | 22.8% |
| 481677208003 | Block Group 3, Census Tract 7208, Galveston County, Texas | 40.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481677208004 | Block Group 4, Census Tract 7208, Galveston County, Texas | 25.0% |
| 481677209001 | Block Group 1, Census Tract 7209, Galveston County, Texas | 100.0% |
| 481677209002 | Block Group 2, Census Tract 7209, Galveston County, Texas | 14.8% |
| 481677209003 | Block Group 3, Census Tract 7209, Galveston County, Texas | 60.5% |
| 481677209004 | Block Group 4, Census Tract 7209, Galveston County, Texas | 64.5% |
| 481677210001 | Block Group 1, Census Tract 7210, Galveston County, Texas | 40.9% |
| 481677211001 | Block Group 1, Census Tract 7211, Galveston County, Texas | 56.3% |
| 481677211002 | Block Group 2, Census Tract 7211, Galveston County, Texas | 57.8% |
| 481677211003 | Block Group 3, Census Tract 7211, Galveston County, Texas | 36.2% |
| 481677211004 | Block Group 4, Census Tract 7211, Galveston County, Texas | 56.6% |
| 481677212011 | Block Group 1, Census Tract 7212.01, Galveston County, Texas | 17.6% |
| 481677212012 | Block Group 2, Census Tract 7212.01, Galveston County, Texas | 30.6% |
| 481677212013 | Block Group 3, Census Tract 7212.01, Galveston County, Texas | 15.9% |
| 481677212014 | Block Group 4, Census Tract 7212.01, Galveston County, Texas | 15.4% |
| 481677212015 | Block Group 5, Census Tract 7212.01, Galveston County, Texas | 4.8% |
| 481677212021 | Block Group 1, Census Tract 7212.02, Galveston County, Texas | 24.8% |
| 481677213001 | Block Group 1, Census Tract 7213, Galveston County, Texas | 15.3% |
| 481677213002 | Block Group 2, Census Tract 7213, Galveston County, Texas | 58.9% |
| 481677213003 | Block Group 3, Census Tract 7213, Galveston County, Texas | 35.0% |
| 481677213004 | Block Group 4, Census Tract 7213, Galveston County, Texas | 10.1% |
| 481677214001 | Block Group 1, Census Tract 7214, Galveston County, Texas | 5.6% |
| 481677214002 | Block Group 2, Census Tract 7214, Galveston County, Texas | 10.8% |
| 481677214003 | Block Group 3, Census Tract 7214, Galveston County, Texas | 7.1% |
| 481677215001 | Block Group 1, Census Tract 7215, Galveston County, Texas | 19.6% |
| 481677215002 | Block Group 2, Census Tract 7215, Galveston County, Texas | 30.1% |
| 481677215003 | Block Group 3, Census Tract 7215, Galveston County, Texas | 26.3% |
| 481677215004 | Block Group 4, Census Tract 7215, Galveston County, Texas | 34.9% |
| 481677216001 | Block Group 1, Census Tract 7216, Galveston County, Texas | 64.5% |
| 481677217001 | Block Group 1, Census Tract 7217, Galveston County, Texas | 62.4% |
| 481677217002 | Block Group 2, Census Tract 7217, Galveston County, Texas | 56.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481677217003 | Block Group 3, Census Tract 7217, Galveston County, Texas | 64.6% |
| 481677217004 | Block Group 4, Census Tract 7217, Galveston County, Texas | 93.7% |
| 481677217005 | Block Group 5, Census Tract 7217, Galveston County, Texas | 68.2% |
| 481677217006 | Block Group 6, Census Tract 7217, Galveston County, Texas | 23.9% |
| 481677218001 | Block Group 1, Census Tract 7218, Galveston County, Texas | 51.9% |
| 481677218002 | Block Group 2, Census Tract 7218, Galveston County, Texas | 49.8% |
| 481677218003 | Block Group 3, Census Tract 7218, Galveston County, Texas | 45.6% |
| 481677218004 | Block Group 4, Census Tract 7218, Galveston County, Texas | 55.1% |
| 481677219001 | Block Group 1, Census Tract 7219, Galveston County, Texas | 28.4% |
| 481677219002 | Block Group 2, Census Tract 7219, Galveston County, Texas | 45.6% |
| 481677219003 | Block Group 3, Census Tract 7219, Galveston County, Texas | 66.1% |
| 481677220011 | Block Group 1, Census Tract 7220.01, Galveston County, Texas | 15.5% |
| 481677220012 | Block Group 2, Census Tract 7220.01, Galveston County, Texas | 12.5% |
| 481677220013 | Block Group 3, Census Tract 7220.01, Galveston County, Texas | 57.9% |
| 481677220021 | Block Group 1, Census Tract 7220.02, Galveston County, Texas | 28.8% |
| 481677220022 | Block Group 2, Census Tract 7220.02, Galveston County, Texas | 34.0% |
| 481677220023 | Block Group 3, Census Tract 7220.02, Galveston County, Texas | 39.2% |
| 481677221001 | Block Group 1, Census Tract 7221, Galveston County, Texas | 40.9% |
| 481677221002 | Block Group 2, Census Tract 7221, Galveston County, Texas | 34.9% |
| 481677221003 | Block Group 3, Census Tract 7221, Galveston County, Texas | 32.7% |
| 481677221004 | Block Group 4, Census Tract 7221, Galveston County, Texas | 31.8% |
| 481677221005 | Block Group 5, Census Tract 7221, Galveston County, Texas | 35.1% |
| 481677221006 | Block Group 6, Census Tract 7221, Galveston County, Texas | 32.2% |
| 481677222001 | Block Group 1, Census Tract 7222, Galveston County, Texas | 46.8% |
| 481677222002 | Block Group 2, Census Tract 7222, Galveston County, Texas | 75.8% |
| 481677222003 | Block Group 3, Census Tract 7222, Galveston County, Texas | 79.2% |
| 481677222004 | Block Group 4, Census Tract 7222, Galveston County, Texas | 90.6% |
| 481677223001 | Block Group 1, Census Tract 7223, Galveston County, Texas | 82.6% |
| 481677223002 | Block Group 2, Census Tract 7223, Galveston County, Texas | 79.2% |
| 481677223003 | Block Group 3, Census Tract 7223, Galveston County, Texas | 88.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481677223004 | Block Group 4, Census Tract 7223, Galveston County, Texas | 57.7% |
| 481677223005 | Block Group 5, Census Tract 7223, Galveston County, Texas | 62.4% |
| 481677223006 | Block Group 6, Census Tract 7223, Galveston County, Texas | 23.4% |
| 481677226001 | Block Group 1, Census Tract 7226, Galveston County, Texas | 47.8% |
| 481677227001 | Block Group 1, Census Tract 7227, Galveston County, Texas | 61.7% |
| 481677227002 | Block Group 2, Census Tract 7227, Galveston County, Texas | 45.9% |
| 481677227003 | Block Group 3, Census Tract 7227, Galveston County, Texas | 45.4% |
| 481677227004 | Block Group 4, Census Tract 7227, Galveston County, Texas | 33.1% |
| 481677228001 | Block Group 1, Census Tract 7228, Galveston County, Texas | 41.5% |
| 481677228002 | Block Group 2, Census Tract 7228, Galveston County, Texas | 57.2% |
| 481677229001 | Block Group 1, Census Tract 7229, Galveston County, Texas | 44.7% |
| 481677229002 | Block Group 2, Census Tract 7229, Galveston County, Texas | 33.5% |
| 481677230001 | Block Group 1, Census Tract 7230, Galveston County, Texas | 59.9% |
| 481677230002 | Block Group 2, Census Tract 7230, Galveston County, Texas | 47.8% |
| 481677230003 | Block Group 3, Census Tract 7230, Galveston County, Texas | 22.9% |
| 481677231001 | Block Group 1, Census Tract 7231, Galveston County, Texas | 35.9% |
| 481677231002 | Block Group 2, Census Tract 7231, Galveston County, Texas | 34.8% |
| 481677231003 | Block Group 3, Census Tract 7231, Galveston County, Texas | 52.5% |
| 481677232001 | Block Group 1, Census Tract 7232, Galveston County, Texas | 47.5% |
| 481677232002 | Block Group 2, Census Tract 7232, Galveston County, Texas | 47.0% |
| 481677233001 | Block Group 1, Census Tract 7233, Galveston County, Texas | 35.8% |
| 481677233002 | Block Group 2, Census Tract 7233, Galveston County, Texas | 8.8% |
| 481677233003 | Block Group 3, Census Tract 7233, Galveston County, Texas | 14.5% |
| 481677234001 | Block Group 1, Census Tract 7234, Galveston County, Texas | 34.4% |
| 481677234002 | Block Group 2, Census Tract 7234, Galveston County, Texas | 21.2% |
| 481677234003 | Block Group 3, Census Tract 7234, Galveston County, Texas | 4.1% |
| 481677234004 | Block Group 4, Census Tract 7234, Galveston County, Texas | 25.6% |
| 481677235011 | Block Group 1, Census Tract 7235.01, Galveston County, Texas | 57.1% |
| 481677235012 | Block Group 2, Census Tract 7235.01, Galveston County, Texas | 60.7% |
| 481677235021 | Block Group 1, Census Tract 7235.02, Galveston County, Texas | 33.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481677235022 | Block Group 2, Census Tract 7235.02, Galveston County, Texas | 29.5% |
| 481677235023 | Block Group 3, Census Tract 7235.02, Galveston County, Texas | 34.8% |
| 481677235024 | Block Group 4, Census Tract 7235.02, Galveston County, Texas | 29.6% |
| 481677236001 | Block Group 1, Census Tract 7236, Galveston County, Texas | 50.3% |
| 481677236002 | Block Group 2, Census Tract 7236, Galveston County, Texas | 36.6% |
| 481677236003 | Block Group 3, Census Tract 7236, Galveston County, Texas | 31.4% |
| 481677237001 | Block Group 1, Census Tract 7237, Galveston County, Texas | 70.1% |
| 481677237002 | Block Group 2, Census Tract 7237, Galveston County, Texas | 86.6% |
| 481677238001 | Block Group 1, Census Tract 7238, Galveston County, Texas | 37.7% |
| 481677238002 | Block Group 2, Census Tract 7238, Galveston County, Texas | 7.6% |
| 481677238003 | Block Group 3, Census Tract 7238, Galveston County, Texas | 27.0% |
| 481677239001 | Block Group 1, Census Tract 7239, Galveston County, Texas | 43.5% |
| 481677239002 | Block Group 2, Census Tract 7239, Galveston County, Texas | 41.5% |
| 481677239003 | Block Group 3, Census Tract 7239, Galveston County, Texas | 65.1% |
| 481677239004 | Block Group 4, Census Tract 7239, Galveston County, Texas | 72.6% |
| 481677240001 | Block Group 1, Census Tract 7240, Galveston County, Texas | 93.5% |
| 481677240002 | Block Group 2, Census Tract 7240, Galveston County, Texas | 57.3% |
| 481677241011 | Block Group 1, Census Tract 7241.01, Galveston County, Texas | 67.1% |
| 481677241012 | Block Group 2, Census Tract 7241.01, Galveston County, Texas | 63.8% |
| 481677242001 | Block Group 1, Census Tract 7242, Galveston County, Texas | 43.3% |
| 481677242002 | Block Group 2, Census Tract 7242, Galveston County, Texas | 54.6% |
| 481677242003 | Block Group 3, Census Tract 7242, Galveston County, Texas | 47.1% |
| 481677243001 | Block Group 1, Census Tract 7243, Galveston County, Texas | 59.3% |
| 481677243002 | Block Group 2, Census Tract 7243, Galveston County, Texas | 69.6% |
| 481677243003 | Block Group 3, Census Tract 7243, Galveston County, Texas | 46.6% |
| 481677243004 | Block Group 4, Census Tract 7243, Galveston County, Texas | 53.2% |
| 481677243005 | Block Group 5, Census Tract 7243, Galveston County, Texas | 64.0% |
| 481677244001 | Block Group 1, Census Tract 7244, Galveston County, Texas | 57.6% |
| 481677244002 | Block Group 2, Census Tract 7244, Galveston County, Texas | 68.9% |
| 481677244003 | Block Group 3, Census Tract 7244, Galveston County, Texas | 85.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481677244004 | Block Group 4, Census Tract 7244, Galveston County, Texas | 68.2% |
| 481677245001 | Block Group 1, Census Tract 7245, Galveston County, Texas | 39.3% |
| 481677246001 | Block Group 1, Census Tract 7246, Galveston County, Texas | 100.0% |
| 481677246002 | Block Group 2, Census Tract 7246, Galveston County, Texas | 74.6% |
| 481677247001 | Block Group 1, Census Tract 7247, Galveston County, Texas | 59.8% |
| 481677247002 | Block Group 2, Census Tract 7247, Galveston County, Texas | 66.2% |
| 481677248001 | Block Group 1, Census Tract 7248, Galveston County, Texas | 51.4% |
| 481677248002 | Block Group 2, Census Tract 7248, Galveston County, Texas | 50.4% |
| 481677249001 | Block Group 1, Census Tract 7249, Galveston County, Texas | 59.4% |
| 481677249002 | Block Group 2, Census Tract 7249, Galveston County, Texas | 64.2% |
| 481677249003 | Block Group 3, Census Tract 7249, Galveston County, Texas | 62.2% |
| 481677250001 | Block Group 1, Census Tract 7250, Galveston County, Texas | 37.8% |
| 481677250002 | Block Group 2, Census Tract 7250, Galveston County, Texas | 71.3% |
| 481677250003 | Block Group 3, Census Tract 7250, Galveston County, Texas | 56.2% |
| 481677251001 | Block Group 1, Census Tract 7251, Galveston County, Texas | 67.4% |
| 481677251002 | Block Group 2, Census Tract 7251, Galveston County, Texas | 77.8% |
| 481677251003 | Block Group 3, Census Tract 7251, Galveston County, Texas | 65.0% |
| 481677252001 | Block Group 1, Census Tract 7252, Galveston County, Texas | 69.9% |
| 481677252002 | Block Group 2, Census Tract 7252, Galveston County, Texas | 93.8% |
| 481677253001 | Block Group 1, Census Tract 7253, Galveston County, Texas | 55.1% |
| 481677253002 | Block Group 2, Census Tract 7253, Galveston County, Texas | 33.3% |
| 481677254001 | Block Group 1, Census Tract 7254, Galveston County, Texas | 43.2% |
| 481677254002 | Block Group 2, Census Tract 7254, Galveston County, Texas | 63.5% |
| 481677254003 | Block Group 3, Census Tract 7254, Galveston County, Texas | 59.7% |
| 481677254004 | Block Group 4, Census Tract 7254, Galveston County, Texas | 52.8% |
| 481677255001 | Block Group 1, Census Tract 7255, Galveston County, Texas | 17.3% |
| 481677255002 | Block Group 2, Census Tract 7255, Galveston County, Texas | 25.0% |
| 481677256001 | Block Group 1, Census Tract 7256, Galveston County, Texas | 61.1% |
| 481677256002 | Block Group 2, Census Tract 7256, Galveston County, Texas | 69.1% |
| 481677256003 | Block Group 3, Census Tract 7256, Galveston County, Texas | 66.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481677256004 | Block Group 4, Census Tract 7256, Galveston County, Texas | 80.8% |
| 481677257001 | Block Group 1, Census Tract 7257, Galveston County, Texas | 33.2% |
| 481677257002 | Block Group 2, Census Tract 7257, Galveston County, Texas | 22.0% |
| 481677258001 | Block Group 1, Census Tract 7258, Galveston County, Texas | 45.2% |
| 481677258002 | Block Group 2, Census Tract 7258, Galveston County, Texas | 59.0% |
| 481677258003 | Block Group 3, Census Tract 7258, Galveston County, Texas | 58.3% |
| 481677259001 | Block Group 1, Census Tract 7259, Galveston County, Texas | 18.8% |
| 481677259002 | Block Group 2, Census Tract 7259, Galveston County, Texas | 66.4% |
| 481677260001 | Block Group 1, Census Tract 7260, Galveston County, Texas | 30.4% |
| 481677260002 | Block Group 2, Census Tract 7260, Galveston County, Texas | 23.8% |
| 481677261001 | Block Group 1, Census Tract 7261, Galveston County, Texas | 40.4% |
| 481677261002 | Block Group 2, Census Tract 7261, Galveston County, Texas | 25.3% |
| 481677262001 | Block Group 1, Census Tract 7262, Galveston County, Texas | 78.5% |
| 481677262002 | Block Group 2, Census Tract 7262, Galveston County, Texas | 63.2% |
| 481679900000 | Block Group 0, Census Tract 9900, Galveston County, Texas | 0.0% |
| 481759601001 | Block Group 1, Census Tract 9601, Goliad County, Texas | 17.6% |
| 481759601002 | Block Group 2, Census Tract 9601, Goliad County, Texas | 32.3% |
| 481759601003 | Block Group 3, Census Tract 9601, Goliad County, Texas | 65.6% |
| 481759602001 | Block Group 1, Census Tract 9602, Goliad County, Texas | 26.9% |
| 481759602002 | Block Group 2, Census Tract 9602, Goliad County, Texas | 24.6% |
| 481759602003 | Block Group 3, Census Tract 9602, Goliad County, Texas | 31.7% |
| 481770001001 | Block Group 1, Census Tract 1, Gonzales County, Texas | 41.3% |
| 481770001002 | Block Group 2, Census Tract 1, Gonzales County, Texas | 49.7% |
| 481770002001 | Block Group 1, Census Tract 2, Gonzales County, Texas | 18.8% |
| 481770002002 | Block Group 2, Census Tract 2, Gonzales County, Texas | 23.0% |
| 481770002003 | Block Group 3, Census Tract 2, Gonzales County, Texas | 34.0% |
| 481770003001 | Block Group 1, Census Tract 3, Gonzales County, Texas | 71.9% |
| 481770003002 | Block Group 2, Census Tract 3, Gonzales County, Texas | 43.1% |
| 481770003003 | Block Group 3, Census Tract 3, Gonzales County, Texas | 58.1% |
| 481770003004 | Block Group 4, Census Tract 3, Gonzales County, Texas | 68.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481770004001 | Block Group 1, Census Tract 4, Gonzales County, Texas | 42.6% |
| 481770004002 | Block Group 2, Census Tract 4, Gonzales County, Texas | 23.4% |
| 481770005001 | Block Group 1, Census Tract 5, Gonzales County, Texas | 46.1% |
| 481770005002 | Block Group 2, Census Tract 5, Gonzales County, Texas | 47.6% |
| 481770005003 | Block Group 3, Census Tract 5, Gonzales County, Texas | 71.7% |
| 481770006001 | Block Group 1, Census Tract 6, Gonzales County, Texas | 42.3% |
| 481770006002 | Block Group 2, Census Tract 6, Gonzales County, Texas | 35.3% |
| 481851801011 | Block Group 1, Census Tract 1801.01, Grimes County, Texas | 61.9% |
| 481851801012 | Block Group 2, Census Tract 1801.01, Grimes County, Texas | 57.4% |
| 481851801013 | Block Group 3, Census Tract 1801.01, Grimes County, Texas | 60.9% |
| 481851801021 | Block Group 1, Census Tract 1801.02, Grimes County, Texas | 40.1% |
| 481851801022 | Block Group 2, Census Tract 1801.02, Grimes County, Texas | 50.2% |
| 481851801023 | Block Group 3, Census Tract 1801.02, Grimes County, Texas | 40.1% |
| 481851802001 | Block Group 1, Census Tract 1802, Grimes County, Texas | 35.3% |
| 481851802002 | Block Group 2, Census Tract 1802, Grimes County, Texas | 31.9% |
| 481851802003 | Block Group 3, Census Tract 1802, Grimes County, Texas | 36.7% |
| 481851802004 | Block Group 4, Census Tract 1802, Grimes County, Texas | 40.4% |
| 481851802005 | Block Group 5, Census Tract 1802, Grimes County, Texas | 22.9% |
| 481851803011 | Block Group 1, Census Tract 1803.01, Grimes County, Texas | 38.6% |
| 481851803012 | Block Group 2, Census Tract 1803.01, Grimes County, Texas | 31.1% |
| 481851803013 | Block Group 3, Census Tract 1803.01, Grimes County, Texas | 23.7% |
| 481851803014 | Block Group 4, Census Tract 1803.01, Grimes County, Texas | 13.0% |
| 481851803021 | Block Group 1, Census Tract 1803.02, Grimes County, Texas | 62.9% |
| 481851803022 | Block Group 2, Census Tract 1803.02, Grimes County, Texas | 28.5% |
| 481851804001 | Block Group 1, Census Tract 1804, Grimes County, Texas | 17.4% |
| 481872101001 | Block Group 1, Census Tract 2101, Guadalupe County, Texas | 31.6% |
| 481872101002 | Block Group 2, Census Tract 2101, Guadalupe County, Texas | 65.1% |
| 481872101003 | Block Group 3, Census Tract 2101, Guadalupe County, Texas | 57.0% |
| 481872101004 | Block Group 4, Census Tract 2101, Guadalupe County, Texas | 36.0% |
| 481872102001 | Block Group 1, Census Tract 2102, Guadalupe County, Texas | 93.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481872102002 | Block Group 2, Census Tract 2102, Guadalupe County, Texas | 86.0% |
| 481872102003 | Block Group 3, Census Tract 2102, Guadalupe County, Texas | 83.7% |
| 481872102004 | Block Group 4, Census Tract 2102, Guadalupe County, Texas | 70.9% |
| 481872103001 | Block Group 1, Census Tract 2103, Guadalupe County, Texas | 78.8% |
| 481872103002 | Block Group 2, Census Tract 2103, Guadalupe County, Texas | 77.9% |
| 481872103003 | Block Group 3, Census Tract 2103, Guadalupe County, Texas | 61.5% |
| 481872103004 | Block Group 4, Census Tract 2103, Guadalupe County, Texas | 63.9% |
| 481872103005 | Block Group 5, Census Tract 2103, Guadalupe County, Texas | 43.6% |
| 481872104001 | Block Group 1, Census Tract 2104, Guadalupe County, Texas | 30.1% |
| 481872104002 | Block Group 2, Census Tract 2104, Guadalupe County, Texas | 65.4% |
| 481872104003 | Block Group 3, Census Tract 2104, Guadalupe County, Texas | 29.6% |
| 481872105041 | Block Group 1, Census Tract 2105.04, Guadalupe County, Texas | 29.0% |
| 481872105042 | Block Group 2, Census Tract 2105.04, Guadalupe County, Texas | 33.8% |
| 481872105051 | Block Group 1, Census Tract 2105.05, Guadalupe County, Texas | 49.0% |
| 481872105052 | Block Group 2, Census Tract 2105.05, Guadalupe County, Texas | 51.6% |
| 481872105061 | Block Group 1, Census Tract 2105.06, Guadalupe County, Texas | 44.8% |
| 481872105062 | Block Group 2, Census Tract 2105.06, Guadalupe County, Texas | 37.8% |
| 481872105071 | Block Group 1, Census Tract 2105.07, Guadalupe County, Texas | 28.3% |
| 481872105072 | Block Group 2, Census Tract 2105.07, Guadalupe County, Texas | 27.5% |
| 481872105081 | Block Group 1, Census Tract 2105.08, Guadalupe County, Texas | 41.8% |
| 481872105082 | Block Group 2, Census Tract 2105.08, Guadalupe County, Texas | 19.8% |
| 481872106031 | Block Group 1, Census Tract 2106.03, Guadalupe County, Texas | 31.7% |
| 481872106032 | Block Group 2, Census Tract 2106.03, Guadalupe County, Texas | 61.4% |
| 481872106041 | Block Group 1, Census Tract 2106.04, Guadalupe County, Texas | 23.9% |
| 481872106042 | Block Group 2, Census Tract 2106.04, Guadalupe County, Texas | 16.7% |
| 481872106043 | Block Group 3, Census Tract 2106.04, Guadalupe County, Texas | 27.6% |
| 481872106061 | Block Group 1, Census Tract 2106.06, Guadalupe County, Texas | 39.6% |
| 481872106062 | Block Group 2, Census Tract 2106.06, Guadalupe County, Texas | 48.6% |
| 481872106071 | Block Group 1, Census Tract 2106.07, Guadalupe County, Texas | 21.3% |
| 481872106072 | Block Group 2, Census Tract 2106.07, Guadalupe County, Texas | 9.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481872106073 | Block Group 3, Census Tract 2106.07, Guadalupe County, Texas | 15.3% |
| 481872106081 | Block Group 1, Census Tract 2106.08, Guadalupe County, Texas | 25.7% |
| 481872106082 | Block Group 2, Census Tract 2106.08, Guadalupe County, Texas | 65.7% |
| 481872106083 | Block Group 3, Census Tract 2106.08, Guadalupe County, Texas | 48.1% |
| 481872107051 | Block Group 1, Census Tract 2107.05, Guadalupe County, Texas | 31.8% |
| 481872107052 | Block Group 2, Census Tract 2107.05, Guadalupe County, Texas | 41.8% |
| 481872107061 | Block Group 1, Census Tract 2107.06, Guadalupe County, Texas | 51.8% |
| 481872107062 | Block Group 2, Census Tract 2107.06, Guadalupe County, Texas | 47.5% |
| 481872107063 | Block Group 3, Census Tract 2107.06, Guadalupe County, Texas | 46.7% |
| 481872107071 | Block Group 1, Census Tract 2107.07, Guadalupe County, Texas | 18.8% |
| 481872107072 | Block Group 2, Census Tract 2107.07, Guadalupe County, Texas | 5.5% |
| 481872107081 | Block Group 1, Census Tract 2107.08, Guadalupe County, Texas | 6.8% |
| 481872107082 | Block Group 2, Census Tract 2107.08, Guadalupe County, Texas | 3.0% |
| 481872107091 | Block Group 1, Census Tract 2107.09, Guadalupe County, Texas | 2.8% |
| 481872107092 | Block Group 2, Census Tract 2107.09, Guadalupe County, Texas | 6.4% |
| 481872107093 | Block Group 3, Census Tract 2107.09, Guadalupe County, Texas | 11.2% |
| 481872107101 | Block Group 1, Census Tract 2107.10, Guadalupe County, Texas | 0.0% |
| 481872107102 | Block Group 2, Census Tract 2107.10, Guadalupe County, Texas | 0.0% |
| 481872107111 | Block Group 1, Census Tract 2107.11, Guadalupe County, Texas | 7.0% |
| 481872107112 | Block Group 2, Census Tract 2107.11, Guadalupe County, Texas | 6.3% |
| 481872107121 | Block Group 1, Census Tract 2107.12, Guadalupe County, Texas | 6.2% |
| 481872107122 | Block Group 2, Census Tract 2107.12, Guadalupe County, Texas | 13.3% |
| 481872107123 | Block Group 3, Census Tract 2107.12, Guadalupe County, Texas | 1.1% |
| 481872107131 | Block Group 1, Census Tract 2107.13, Guadalupe County, Texas | 11.3% |
| 481872107132 | Block Group 2, Census Tract 2107.13, Guadalupe County, Texas | 8.8% |
| 481872107141 | Block Group 1, Census Tract 2107.14, Guadalupe County, Texas | 16.9% |
| 481872107142 | Block Group 2, Census Tract 2107.14, Guadalupe County, Texas | 36.6% |
| 481872108011 | Block Group 1, Census Tract 2108.01, Guadalupe County, Texas | 29.0% |
| 481872108012 | Block Group 2, Census Tract 2108.01, Guadalupe County, Texas | 75.3% |
| 481872108013 | Block Group 3, Census Tract 2108.01, Guadalupe County, Texas | 39.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481872108031 | Block Group 1, Census Tract 2108.03, Guadalupe County, Texas | 19.7% |
| 481872108032 | Block Group 2, Census Tract 2108.03, Guadalupe County, Texas | 31.4% |
| 481872108041 | Block Group 1, Census Tract 2108.04, Guadalupe County, Texas | 31.8% |
| 481872108042 | Block Group 2, Census Tract 2108.04, Guadalupe County, Texas | 37.0% |
| 481872109011 | Block Group 1, Census Tract 2109.01, Guadalupe County, Texas | 31.1% |
| 481872109012 | Block Group 2, Census Tract 2109.01, Guadalupe County, Texas | 38.5% |
| 481872109013 | Block Group 3, Census Tract 2109.01, Guadalupe County, Texas | 44.1% |
| 481872109021 | Block Group 1, Census Tract 2109.02, Guadalupe County, Texas | 27.6% |
| 481872109022 | Block Group 2, Census Tract 2109.02, Guadalupe County, Texas | 45.2% |
| 481990301001 | Block Group 1, Census Tract 301, Hardin County, Texas | 15.1% |
| 481990301002 | Block Group 2, Census Tract 301, Hardin County, Texas | 52.4% |
| 481990301003 | Block Group 3, Census Tract 301, Hardin County, Texas | 35.6% |
| 481990302001 | Block Group 1, Census Tract 302, Hardin County, Texas | 10.0% |
| 481990302002 | Block Group 2, Census Tract 302, Hardin County, Texas | 41.4% |
| 481990302003 | Block Group 3, Census Tract 302, Hardin County, Texas | 31.9% |
| 481990303001 | Block Group 1, Census Tract 303, Hardin County, Texas | 32.6% |
| 481990303002 | Block Group 2, Census Tract 303, Hardin County, Texas | 29.2% |
| 481990303003 | Block Group 3, Census Tract 303, Hardin County, Texas | 11.9% |
| 481990303004 | Block Group 4, Census Tract 303, Hardin County, Texas | 12.3% |
| 481990304001 | Block Group 1, Census Tract 304, Hardin County, Texas | 44.2% |
| 481990304002 | Block Group 2, Census Tract 304, Hardin County, Texas | 71.0% |
| 481990304003 | Block Group 3, Census Tract 304, Hardin County, Texas | 32.1% |
| 481990305011 | Block Group 1, Census Tract 305.01, Hardin County, Texas | 11.1% |
| 481990305012 | Block Group 2, Census Tract 305.01, Hardin County, Texas | 15.0% |
| 481990305021 | Block Group 1, Census Tract 305.02, Hardin County, Texas | 26.3% |
| 481990305022 | Block Group 2, Census Tract 305.02, Hardin County, Texas | 29.5% |
| 481990305023 | Block Group 3, Census Tract 305.02, Hardin County, Texas | 24.8% |
| 481990305024 | Block Group 4, Census Tract 305.02, Hardin County, Texas | 25.7% |
| 481990305025 | Block Group 5, Census Tract 305.02, Hardin County, Texas | 31.4% |
| 481990306001 | Block Group 1, Census Tract 306, Hardin County, Texas | 23.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 481990306002 | Block Group 2, Census Tract 306, Hardin County, Texas | 23.2% |
| 481990307001 | Block Group 1, Census Tract 307, Hardin County, Texas | 35.8% |
| 481990307002 | Block Group 2, Census Tract 307, Hardin County, Texas | 12.3% |
| 481990307003 | Block Group 3, Census Tract 307, Hardin County, Texas | 34.4% |
| 481990308001 | Block Group 1, Census Tract 308, Hardin County, Texas | 59.0% |
| 481990308002 | Block Group 2, Census Tract 308, Hardin County, Texas | 23.0% |
| 481990308003 | Block Group 3, Census Tract 308, Hardin County, Texas | 40.1% |
| 481990308004 | Block Group 4, Census Tract 308, Hardin County, Texas | 57.5% |
| 481990308005 | Block Group 5, Census Tract 308, Hardin County, Texas | 14.1% |
| 481990308006 | Block Group 6, Census Tract 308, Hardin County, Texas | 28.2% |
| 481990309001 | Block Group 1, Census Tract 309, Hardin County, Texas | 37.7% |
| 481990309002 | Block Group 2, Census Tract 309, Hardin County, Texas | 35.2% |
| 481990309003 | Block Group 3, Census Tract 309, Hardin County, Texas | 17.6% |
| 481990310001 | Block Group 1, Census Tract 310, Hardin County, Texas | 60.8% |
| 481990310002 | Block Group 2, Census Tract 310, Hardin County, Texas | 25.3% |
| 481990310003 | Block Group 3, Census Tract 310, Hardin County, Texas | 36.2% |
| 482011000001 | Block Group 1, Census Tract 1000, Harris County, Texas | 55.7% |
| 482011000002 | Block Group 2, Census Tract 1000, Harris County, Texas | 51.5% |
| 482011000003 | Block Group 3, Census Tract 1000, Harris County, Texas | 15.9% |
| 482012101001 | Block Group 1, Census Tract 2101, Harris County, Texas | 0.0% |
| 482012104001 | Block Group 1, Census Tract 2104, Harris County, Texas | 78.5% |
| 482012104002 | Block Group 2, Census Tract 2104, Harris County, Texas | 64.1% |
| 482012104003 | Block Group 3, Census Tract 2104, Harris County, Texas | 69.1% |
| 482012104004 | Block Group 4, Census Tract 2104, Harris County, Texas | 71.7% |
| 482012105001 | Block Group 1, Census Tract 2105, Harris County, Texas | 54.1% |
| 482012105002 | Block Group 2, Census Tract 2105, Harris County, Texas | 65.1% |
| 482012105003 | Block Group 3, Census Tract 2105, Harris County, Texas | 81.3% |
| 482012106001 | Block Group 1, Census Tract 2106, Harris County, Texas | 64.9% |
| 482012106002 | Block Group 2, Census Tract 2106, Harris County, Texas | 43.4% |
| 482012106003 | Block Group 3, Census Tract 2106, Harris County, Texas | 44.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012106004 | Block Group 4, Census Tract 2106, Harris County, Texas | 77.2% |
| 482012107001 | Block Group 1, Census Tract 2107, Harris County, Texas | 65.9% |
| 482012107002 | Block Group 2, Census Tract 2107, Harris County, Texas | 74.7% |
| 482012107003 | Block Group 3, Census Tract 2107, Harris County, Texas | 47.6% |
| 482012108001 | Block Group 1, Census Tract 2108, Harris County, Texas | 69.3% |
| 482012108002 | Block Group 2, Census Tract 2108, Harris County, Texas | 73.8% |
| 482012109001 | Block Group 1, Census Tract 2109, Harris County, Texas | 77.8% |
| 482012109002 | Block Group 2, Census Tract 2109, Harris County, Texas | 41.5% |
| 482012110001 | Block Group 1, Census Tract 2110, Harris County, Texas | 73.3% |
| 482012110002 | Block Group 2, Census Tract 2110, Harris County, Texas | 79.1% |
| 482012111001 | Block Group 1, Census Tract 2111, Harris County, Texas | 97.7% |
| 482012111002 | Block Group 2, Census Tract 2111, Harris County, Texas | 92.4% |
| 482012111003 | Block Group 3, Census Tract 2111, Harris County, Texas | 93.8% |
| 482012111004 | Block Group 4, Census Tract 2111, Harris County, Texas | 87.9% |
| 482012111005 | Block Group 5, Census Tract 2111, Harris County, Texas | 85.9% |
| 482012111006 | Block Group 6, Census Tract 2111, Harris County, Texas | 92.5% |
| 482012112001 | Block Group 1, Census Tract 2112, Harris County, Texas | 88.0% |
| 482012112002 | Block Group 2, Census Tract 2112, Harris County, Texas | 50.0% |
| 482012112003 | Block Group 3, Census Tract 2112, Harris County, Texas | 78.5% |
| 482012113001 | Block Group 1, Census Tract 2113, Harris County, Texas | 85.5% |
| 482012113002 | Block Group 2, Census Tract 2113, Harris County, Texas | 94.8% |
| 482012113003 | Block Group 3, Census Tract 2113, Harris County, Texas | 89.7% |
| 482012113004 | Block Group 4, Census Tract 2113, Harris County, Texas | 65.2% |
| 482012113005 | Block Group 5, Census Tract 2113, Harris County, Texas | 86.3% |
| 482012114001 | Block Group 1, Census Tract 2114, Harris County, Texas | 58.6% |
| 482012114002 | Block Group 2, Census Tract 2114, Harris County, Texas | 69.9% |
| 482012114003 | Block Group 3, Census Tract 2114, Harris County, Texas | 38.3% |
| 482012115001 | Block Group 1, Census Tract 2115, Harris County, Texas | 97.1% |
| 482012115002 | Block Group 2, Census Tract 2115, Harris County, Texas | 69.7% |
| 482012115003 | Block Group 3, Census Tract 2115, Harris County, Texas | 56.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012115004 | Block Group 4, Census Tract 2115, Harris County, Texas | 80.0% |
| 482012115005 | Block Group 5, Census Tract 2115, Harris County, Texas | 59.1% |
| 482012116001 | Block Group 1, Census Tract 2116, Harris County, Texas | 69.6% |
| 482012116002 | Block Group 2, Census Tract 2116, Harris County, Texas | 71.1% |
| 482012117001 | Block Group 1, Census Tract 2117, Harris County, Texas | 75.5% |
| 482012117002 | Block Group 2, Census Tract 2117, Harris County, Texas | 68.2% |
| 482012117003 | Block Group 3, Census Tract 2117, Harris County, Texas | 66.7% |
| 482012119001 | Block Group 1, Census Tract 2119, Harris County, Texas | 69.4% |
| 482012119002 | Block Group 2, Census Tract 2119, Harris County, Texas | 86.0% |
| 482012119003 | Block Group 3, Census Tract 2119, Harris County, Texas | 79.0% |
| 482012119004 | Block Group 4, Census Tract 2119, Harris County, Texas | 65.1% |
| 482012123001 | Block Group 1, Census Tract 2123, Harris County, Texas | 83.3% |
| 482012123002 | Block Group 2, Census Tract 2123, Harris County, Texas | 68.2% |
| 482012123003 | Block Group 3, Census Tract 2123, Harris County, Texas | 87.7% |
| 482012123004 | Block Group 4, Census Tract 2123, Harris County, Texas | 77.4% |
| 482012123005 | Block Group 5, Census Tract 2123, Harris County, Texas | 61.2% |
| 482012124001 | Block Group 1, Census Tract 2124, Harris County, Texas | 74.0% |
| 482012124002 | Block Group 2, Census Tract 2124, Harris County, Texas | 78.1% |
| 482012124003 | Block Group 3, Census Tract 2124, Harris County, Texas | 66.3% |
| 482012125001 | Block Group 1, Census Tract 2125, Harris County, Texas | 65.1% |
| 482012125002 | Block Group 2, Census Tract 2125, Harris County, Texas | 64.0% |
| 482012125003 | Block Group 3, Census Tract 2125, Harris County, Texas | 61.2% |
| 482012201001 | Block Group 1, Census Tract 2201, Harris County, Texas | 76.5% |
| 482012201002 | Block Group 2, Census Tract 2201, Harris County, Texas | 70.2% |
| 482012202001 | Block Group 1, Census Tract 2202, Harris County, Texas | 73.7% |
| 482012202002 | Block Group 2, Census Tract 2202, Harris County, Texas | 60.2% |
| 482012203001 | Block Group 1, Census Tract 2203, Harris County, Texas | 75.3% |
| 482012203002 | Block Group 2, Census Tract 2203, Harris County, Texas | 63.9% |
| 482012203003 | Block Group 3, Census Tract 2203, Harris County, Texas | 50.0% |
| 482012204001 | Block Group 1, Census Tract 2204, Harris County, Texas | 77.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012204002 | Block Group 2, Census Tract 2204, Harris County, Texas | 67.6% |
| 482012204003 | Block Group 3, Census Tract 2204, Harris County, Texas | 71.4% |
| 482012205001 | Block Group 1, Census Tract 2205, Harris County, Texas | 98.7% |
| 482012205002 | Block Group 2, Census Tract 2205, Harris County, Texas | 67.2% |
| 482012205003 | Block Group 3, Census Tract 2205, Harris County, Texas | 55.8% |
| 482012206001 | Block Group 1, Census Tract 2206, Harris County, Texas | 51.2% |
| 482012206002 | Block Group 2, Census Tract 2206, Harris County, Texas | 39.1% |
| 482012207001 | Block Group 1, Census Tract 2207, Harris County, Texas | 74.5% |
| 482012207002 | Block Group 2, Census Tract 2207, Harris County, Texas | 76.9% |
| 482012207003 | Block Group 3, Census Tract 2207, Harris County, Texas | 55.4% |
| 482012207004 | Block Group 4, Census Tract 2207, Harris County, Texas | 100.0% |
| 482012207005 | Block Group 5, Census Tract 2207, Harris County, Texas | 76.9% |
| 482012208001 | Block Group 1, Census Tract 2208, Harris County, Texas | 95.8% |
| 482012208002 | Block Group 2, Census Tract 2208, Harris County, Texas | 83.0% |
| 482012209001 | Block Group 1, Census Tract 2209, Harris County, Texas | 72.6% |
| 482012209002 | Block Group 2, Census Tract 2209, Harris County, Texas | 87.9% |
| 482012210001 | Block Group 1, Census Tract 2210, Harris County, Texas | 80.5% |
| 482012210002 | Block Group 2, Census Tract 2210, Harris County, Texas | 81.2% |
| 482012211001 | Block Group 1, Census Tract 2211, Harris County, Texas | 60.8% |
| 482012211002 | Block Group 2, Census Tract 2211, Harris County, Texas | 59.8% |
| 482012211003 | Block Group 3, Census Tract 2211, Harris County, Texas | 76.9% |
| 482012212001 | Block Group 1, Census Tract 2212, Harris County, Texas | 46.2% |
| 482012212002 | Block Group 2, Census Tract 2212, Harris County, Texas | 83.1% |
| 482012212003 | Block Group 3, Census Tract 2212, Harris County, Texas | 67.1% |
| 482012213001 | Block Group 1, Census Tract 2213, Harris County, Texas | 77.1% |
| 482012213002 | Block Group 2, Census Tract 2213, Harris County, Texas | 72.9% |
| 482012213003 | Block Group 3, Census Tract 2213, Harris County, Texas | 77.7% |
| 482012213004 | Block Group 4, Census Tract 2213, Harris County, Texas | 67.2% |
| 482012213005 | Block Group 5, Census Tract 2213, Harris County, Texas | 57.8% |
| 482012214001 | Block Group 1, Census Tract 2214, Harris County, Texas | 83.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|-----------|-------------|------------|
| 482012214002 | Block Group 2, Census Tract 2214, Harris County, Texas | 54.5% |
| 482012214003 | Block Group 3, Census Tract 2214, Harris County, Texas | 84.0% |
| 482012215001 | Block Group 1, Census Tract 2215, Harris County, Texas | 69.9% |
| 482012215002 | Block Group 2, Census Tract 2215, Harris County, Texas | 84.1% |
| 482012215003 | Block Group 3, Census Tract 2215, Harris County, Texas | 76.2% |
| 482012216001 | Block Group 1, Census Tract 2216, Harris County, Texas | 32.1% |
| 482012216002 | Block Group 2, Census Tract 2216, Harris County, Texas | 41.6% |
| 482012216003 | Block Group 3, Census Tract 2216, Harris County, Texas | 80.3% |
| 482012216004 | Block Group 4, Census Tract 2216, Harris County, Texas | 61.0% |
| 482012216005 | Block Group 5, Census Tract 2216, Harris County, Texas | 59.7% |
| 482012217001 | Block Group 1, Census Tract 2217, Harris County, Texas | 87.2% |
| 482012217002 | Block Group 2, Census Tract 2217, Harris County, Texas | 51.8% |
| 482012217003 | Block Group 3, Census Tract 2217, Harris County, Texas | 39.5% |
| 482012217004 | Block Group 4, Census Tract 2217, Harris County, Texas | 72.4% |
| 482012218001 | Block Group 1, Census Tract 2218, Harris County, Texas | 75.1% |
| 482012218002 | Block Group 2, Census Tract 2218, Harris County, Texas | 66.5% |
| 482012219001 | Block Group 1, Census Tract 2219, Harris County, Texas | 84.8% |
| 482012219002 | Block Group 2, Census Tract 2219, Harris County, Texas | 61.2% |
| 482012219003 | Block Group 3, Census Tract 2219, Harris County, Texas | 96.0% |
| 482012220001 | Block Group 1, Census Tract 2220, Harris County, Texas | 63.5% |
| 482012221001 | Block Group 1, Census Tract 2221, Harris County, Texas | 52.6% |
| 482012221002 | Block Group 2, Census Tract 2221, Harris County, Texas | 70.4% |
| 482012222001 | Block Group 1, Census Tract 2222, Harris County, Texas | 79.7% |
| 482012222002 | Block Group 2, Census Tract 2222, Harris County, Texas | 81.9% |
| 482012223001 | Block Group 1, Census Tract 2223, Harris County, Texas | 56.8% |
| 482012223002 | Block Group 2, Census Tract 2223, Harris County, Texas | 58.6% |
| 482012223003 | Block Group 3, Census Tract 2223, Harris County, Texas | 57.7% |
| 482012224011 | Block Group 1, Census Tract 2224.01, Harris County, Texas | 77.8% |
| 482012224012 | Block Group 2, Census Tract 2224.01, Harris County, Texas | 61.5% |
| 482012224021 | Block Group 1, Census Tract 2224.02, Harris County, Texas | 54.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012224022 | Block Group 2, Census Tract 2224.02, Harris County, Texas | 89.6% |
| 482012224023 | Block Group 3, Census Tract 2224.02, Harris County, Texas | 53.4% |
| 482012225011 | Block Group 1, Census Tract 2225.01, Harris County, Texas | 93.8% |
| 482012225012 | Block Group 2, Census Tract 2225.01, Harris County, Texas | 67.5% |
| 482012225021 | Block Group 1, Census Tract 2225.02, Harris County, Texas | 57.8% |
| 482012225022 | Block Group 2, Census Tract 2225.02, Harris County, Texas | 36.8% |
| 482012225031 | Block Group 1, Census Tract 2225.03, Harris County, Texas | 51.9% |
| 482012225032 | Block Group 2, Census Tract 2225.03, Harris County, Texas | 81.3% |
| 482012225033 | Block Group 3, Census Tract 2225.03, Harris County, Texas | 81.6% |
| 482012226001 | Block Group 1, Census Tract 2226, Harris County, Texas | 82.4% |
| 482012226002 | Block Group 2, Census Tract 2226, Harris County, Texas | 91.1% |
| 482012227001 | Block Group 1, Census Tract 2227, Harris County, Texas | 81.9% |
| 482012227002 | Block Group 2, Census Tract 2227, Harris County, Texas | 97.1% |
| 482012228001 | Block Group 1, Census Tract 2228, Harris County, Texas | 58.2% |
| 482012228002 | Block Group 2, Census Tract 2228, Harris County, Texas | 59.0% |
| 482012229001 | Block Group 1, Census Tract 2229, Harris County, Texas | 62.4% |
| 482012229002 | Block Group 2, Census Tract 2229, Harris County, Texas | 44.6% |
| 482012229003 | Block Group 3, Census Tract 2229, Harris County, Texas | 51.2% |
| 482012229004 | Block Group 4, Census Tract 2229, Harris County, Texas | 58.2% |
| 482012230011 | Block Group 1, Census Tract 2230.01, Harris County, Texas | 71.2% |
| 482012230012 | Block Group 2, Census Tract 2230.01, Harris County, Texas | 34.4% |
| 482012230021 | Block Group 1, Census Tract 2230.02, Harris County, Texas | 53.7% |
| 482012230022 | Block Group 2, Census Tract 2230.02, Harris County, Texas | 85.9% |
| 482012231001 | Block Group 1, Census Tract 2231, Harris County, Texas | 70.2% |
| 482012301001 | Block Group 1, Census Tract 2301, Harris County, Texas | 91.6% |
| 482012302001 | Block Group 1, Census Tract 2302, Harris County, Texas | 90.4% |
| 482012302002 | Block Group 2, Census Tract 2302, Harris County, Texas | 63.7% |
| 482012302003 | Block Group 3, Census Tract 2302, Harris County, Texas | 73.5% |
| 482012302004 | Block Group 4, Census Tract 2302, Harris County, Texas | 50.8% |
| 482012302005 | Block Group 5, Census Tract 2302, Harris County, Texas | 47.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012303001 | Block Group 1, Census Tract 2303, Harris County, Texas | 92.0% |
| 482012303002 | Block Group 2, Census Tract 2303, Harris County, Texas | 73.8% |
| 482012304001 | Block Group 1, Census Tract 2304, Harris County, Texas | 56.9% |
| 482012304002 | Block Group 2, Census Tract 2304, Harris County, Texas | 75.8% |
| 482012304003 | Block Group 3, Census Tract 2304, Harris County, Texas | 75.2% |
| 482012305001 | Block Group 1, Census Tract 2305, Harris County, Texas | 65.9% |
| 482012305002 | Block Group 2, Census Tract 2305, Harris County, Texas | 59.4% |
| 482012305003 | Block Group 3, Census Tract 2305, Harris County, Texas | 64.7% |
| 482012306001 | Block Group 1, Census Tract 2306, Harris County, Texas | 93.1% |
| 482012306002 | Block Group 2, Census Tract 2306, Harris County, Texas | 73.8% |
| 482012307001 | Block Group 1, Census Tract 2307, Harris County, Texas | 74.7% |
| 482012307002 | Block Group 2, Census Tract 2307, Harris County, Texas | 66.7% |
| 482012307003 | Block Group 3, Census Tract 2307, Harris County, Texas | 74.2% |
| 482012308001 | Block Group 1, Census Tract 2308, Harris County, Texas | 57.2% |
| 482012308002 | Block Group 2, Census Tract 2308, Harris County, Texas | 66.7% |
| 482012309001 | Block Group 1, Census Tract 2309, Harris County, Texas | 68.8% |
| 482012309002 | Block Group 2, Census Tract 2309, Harris County, Texas | 61.6% |
| 482012309003 | Block Group 3, Census Tract 2309, Harris County, Texas | 70.2% |
| 482012309004 | Block Group 4, Census Tract 2309, Harris County, Texas | 83.2% |
| 482012310001 | Block Group 1, Census Tract 2310, Harris County, Texas | 69.8% |
| 482012310002 | Block Group 2, Census Tract 2310, Harris County, Texas | 79.9% |
| 482012311001 | Block Group 1, Census Tract 2311, Harris County, Texas | 55.5% |
| 482012311002 | Block Group 2, Census Tract 2311, Harris County, Texas | 59.7% |
| 482012311003 | Block Group 3, Census Tract 2311, Harris County, Texas | 60.6% |
| 482012312001 | Block Group 1, Census Tract 2312, Harris County, Texas | 77.1% |
| 482012312002 | Block Group 2, Census Tract 2312, Harris County, Texas | 41.9% |
| 482012312003 | Block Group 3, Census Tract 2312, Harris County, Texas | 65.7% |
| 482012313001 | Block Group 1, Census Tract 2313, Harris County, Texas | 62.9% |
| 482012313002 | Block Group 2, Census Tract 2313, Harris County, Texas | 59.5% |
| 482012314001 | Block Group 1, Census Tract 2314, Harris County, Texas | 60.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012315001 | Block Group 1, Census Tract 2315, Harris County, Texas | 70.0% |
| 482012315002 | Block Group 2, Census Tract 2315, Harris County, Texas | 69.9% |
| 482012316001 | Block Group 1, Census Tract 2316, Harris County, Texas | 55.9% |
| 482012316002 | Block Group 2, Census Tract 2316, Harris County, Texas | 55.5% |
| 482012317001 | Block Group 1, Census Tract 2317, Harris County, Texas | 64.5% |
| 482012317002 | Block Group 2, Census Tract 2317, Harris County, Texas | 64.6% |
| 482012318001 | Block Group 1, Census Tract 2318, Harris County, Texas | 68.1% |
| 482012318002 | Block Group 2, Census Tract 2318, Harris County, Texas | 72.1% |
| 482012319001 | Block Group 1, Census Tract 2319, Harris County, Texas | 53.5% |
| 482012319002 | Block Group 2, Census Tract 2319, Harris County, Texas | 63.9% |
| 482012319003 | Block Group 3, Census Tract 2319, Harris County, Texas | 38.5% |
| 482012319004 | Block Group 4, Census Tract 2319, Harris County, Texas | 58.9% |
| 482012320001 | Block Group 1, Census Tract 2320, Harris County, Texas | 32.7% |
| 482012320002 | Block Group 2, Census Tract 2320, Harris County, Texas | 64.1% |
| 482012321001 | Block Group 1, Census Tract 2321, Harris County, Texas | 73.6% |
| 482012321002 | Block Group 2, Census Tract 2321, Harris County, Texas | 71.3% |
| 482012322001 | Block Group 1, Census Tract 2322, Harris County, Texas | 27.5% |
| 482012322002 | Block Group 2, Census Tract 2322, Harris County, Texas | 76.0% |
| 482012322003 | Block Group 3, Census Tract 2322, Harris County, Texas | 22.9% |
| 482012322004 | Block Group 4, Census Tract 2322, Harris County, Texas | 72.1% |
| 482012323011 | Block Group 1, Census Tract 2323.01, Harris County, Texas | 55.5% |
| 482012323012 | Block Group 2, Census Tract 2323.01, Harris County, Texas | 65.8% |
| 482012323013 | Block Group 3, Census Tract 2323.01, Harris County, Texas | 50.2% |
| 482012323021 | Block Group 1, Census Tract 2323.02, Harris County, Texas | 54.1% |
| 482012323022 | Block Group 2, Census Tract 2323.02, Harris County, Texas | 47.4% |
| 482012323023 | Block Group 3, Census Tract 2323.02, Harris County, Texas | 37.9% |
| 482012324011 | Block Group 1, Census Tract 2324.01, Harris County, Texas | 25.7% |
| 482012324012 | Block Group 2, Census Tract 2324.01, Harris County, Texas | 40.2% |
| 482012324013 | Block Group 3, Census Tract 2324.01, Harris County, Texas | 46.0% |
| 482012324014 | Block Group 4, Census Tract 2324.01, Harris County, Texas | 72.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012324021 | Block Group 1, Census Tract 2324.02, Harris County, Texas | 46.4% |
| 482012324022 | Block Group 2, Census Tract 2324.02, Harris County, Texas | 52.8% |
| 482012324031 | Block Group 1, Census Tract 2324.03, Harris County, Texas | 66.2% |
| 482012324032 | Block Group 2, Census Tract 2324.03, Harris County, Texas | 58.3% |
| 482012325001 | Block Group 1, Census Tract 2325, Harris County, Texas | 50.3% |
| 482012326001 | Block Group 1, Census Tract 2326, Harris County, Texas | 20.2% |
| 482012326002 | Block Group 2, Census Tract 2326, Harris County, Texas | 23.9% |
| 482012327011 | Block Group 1, Census Tract 2327.01, Harris County, Texas | 59.3% |
| 482012327012 | Block Group 2, Census Tract 2327.01, Harris County, Texas | 50.6% |
| 482012327013 | Block Group 3, Census Tract 2327.01, Harris County, Texas | 64.9% |
| 482012327021 | Block Group 1, Census Tract 2327.02, Harris County, Texas | 86.3% |
| 482012327022 | Block Group 2, Census Tract 2327.02, Harris County, Texas | 52.2% |
| 482012327023 | Block Group 3, Census Tract 2327.02, Harris County, Texas | 59.5% |
| 482012328001 | Block Group 1, Census Tract 2328, Harris County, Texas | 69.6% |
| 482012328002 | Block Group 2, Census Tract 2328, Harris County, Texas | 40.8% |
| 482012329001 | Block Group 1, Census Tract 2329, Harris County, Texas | 15.3% |
| 482012329002 | Block Group 2, Census Tract 2329, Harris County, Texas | 47.8% |
| 482012329003 | Block Group 3, Census Tract 2329, Harris County, Texas | 39.0% |
| 482012330011 | Block Group 1, Census Tract 2330.01, Harris County, Texas | 63.2% |
| 482012330012 | Block Group 2, Census Tract 2330.01, Harris County, Texas | 69.2% |
| 482012330021 | Block Group 1, Census Tract 2330.02, Harris County, Texas | 15.8% |
| 482012330022 | Block Group 2, Census Tract 2330.02, Harris County, Texas | 30.5% |
| 482012330031 | Block Group 1, Census Tract 2330.03, Harris County, Texas | 54.0% |
| 482012330032 | Block Group 2, Census Tract 2330.03, Harris County, Texas | 30.3% |
| 482012331011 | Block Group 1, Census Tract 2331.01, Harris County, Texas | 83.4% |
| 482012331012 | Block Group 2, Census Tract 2331.01, Harris County, Texas | 31.9% |
| 482012331013 | Block Group 3, Census Tract 2331.01, Harris County, Texas | 52.8% |
| 482012331021 | Block Group 1, Census Tract 2331.02, Harris County, Texas | 65.0% |
| 482012331022 | Block Group 2, Census Tract 2331.02, Harris County, Texas | 77.8% |
| 482012331023 | Block Group 3, Census Tract 2331.02, Harris County, Texas | 70.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012331031 | Block Group 1, Census Tract 2331.03, Harris County, Texas | 72.1% |
| 482012331032 | Block Group 2, Census Tract 2331.03, Harris County, Texas | 64.8% |
| 482012332001 | Block Group 1, Census Tract 2332, Harris County, Texas | 43.8% |
| 482012332002 | Block Group 2, Census Tract 2332, Harris County, Texas | 67.6% |
| 482012332003 | Block Group 3, Census Tract 2332, Harris County, Texas | 44.3% |
| 482012332004 | Block Group 4, Census Tract 2332, Harris County, Texas | 56.3% |
| 482012333001 | Block Group 1, Census Tract 2333, Harris County, Texas | 90.6% |
| 482012333002 | Block Group 2, Census Tract 2333, Harris County, Texas | 74.1% |
| 482012333003 | Block Group 3, Census Tract 2333, Harris County, Texas | 70.5% |
| 482012334001 | Block Group 1, Census Tract 2334, Harris County, Texas | 47.8% |
| 482012334002 | Block Group 2, Census Tract 2334, Harris County, Texas | 56.2% |
| 482012335001 | Block Group 1, Census Tract 2335, Harris County, Texas | 40.8% |
| 482012335002 | Block Group 2, Census Tract 2335, Harris County, Texas | 66.5% |
| 482012335003 | Block Group 3, Census Tract 2335, Harris County, Texas | 46.5% |
| 482012335004 | Block Group 4, Census Tract 2335, Harris County, Texas | 86.6% |
| 482012336001 | Block Group 1, Census Tract 2336, Harris County, Texas | 71.9% |
| 482012336002 | Block Group 2, Census Tract 2336, Harris County, Texas | 64.2% |
| 482012337011 | Block Group 1, Census Tract 2337.01, Harris County, Texas | 55.7% |
| 482012337012 | Block Group 2, Census Tract 2337.01, Harris County, Texas | 77.8% |
| 482012337021 | Block Group 1, Census Tract 2337.02, Harris County, Texas | 91.1% |
| 482012337022 | Block Group 2, Census Tract 2337.02, Harris County, Texas | 73.5% |
| 482012337023 | Block Group 3, Census Tract 2337.02, Harris County, Texas | 57.4% |
| 482012337031 | Block Group 1, Census Tract 2337.03, Harris County, Texas | 69.3% |
| 482012337032 | Block Group 2, Census Tract 2337.03, Harris County, Texas | 65.9% |
| 482012401001 | Block Group 1, Census Tract 2401, Harris County, Texas | 71.1% |
| 482012401002 | Block Group 2, Census Tract 2401, Harris County, Texas | 86.4% |
| 482012404001 | Block Group 1, Census Tract 2404, Harris County, Texas | 33.8% |
| 482012404002 | Block Group 2, Census Tract 2404, Harris County, Texas | 74.2% |
| 482012405011 | Block Group 1, Census Tract 2405.01, Harris County, Texas | 72.4% |
| 482012405012 | Block Group 2, Census Tract 2405.01, Harris County, Texas | 81.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012405021 | Block Group 1, Census Tract 2405.02, Harris County, Texas | 89.8% |
| 482012405022 | Block Group 2, Census Tract 2405.02, Harris County, Texas | 82.5% |
| 482012405023 | Block Group 3, Census Tract 2405.02, Harris County, Texas | 95.5% |
| 482012406001 | Block Group 1, Census Tract 2406, Harris County, Texas | 75.9% |
| 482012407011 | Block Group 1, Census Tract 2407.01, Harris County, Texas | 35.6% |
| 482012407012 | Block Group 2, Census Tract 2407.01, Harris County, Texas | 43.4% |
| 482012407021 | Block Group 1, Census Tract 2407.02, Harris County, Texas | 62.7% |
| 482012407022 | Block Group 2, Census Tract 2407.02, Harris County, Texas | 52.0% |
| 482012408011 | Block Group 1, Census Tract 2408.01, Harris County, Texas | 72.0% |
| 482012408012 | Block Group 2, Census Tract 2408.01, Harris County, Texas | 92.9% |
| 482012408013 | Block Group 3, Census Tract 2408.01, Harris County, Texas | 47.5% |
| 482012408014 | Block Group 4, Census Tract 2408.01, Harris County, Texas | 80.7% |
| 482012408021 | Block Group 1, Census Tract 2408.02, Harris County, Texas | 45.4% |
| 482012408022 | Block Group 2, Census Tract 2408.02, Harris County, Texas | 62.0% |
| 482012409011 | Block Group 1, Census Tract 2409.01, Harris County, Texas | 36.3% |
| 482012409012 | Block Group 2, Census Tract 2409.01, Harris County, Texas | 43.0% |
| 482012409021 | Block Group 1, Census Tract 2409.02, Harris County, Texas | 25.7% |
| 482012409022 | Block Group 2, Census Tract 2409.02, Harris County, Texas | 34.2% |
| 482012409023 | Block Group 3, Census Tract 2409.02, Harris County, Texas | 55.9% |
| 482012409024 | Block Group 4, Census Tract 2409.02, Harris County, Texas | 21.9% |
| 482012410001 | Block Group 1, Census Tract 2410, Harris County, Texas | 39.0% |
| 482012410002 | Block Group 2, Census Tract 2410, Harris County, Texas | 30.7% |
| 482012410003 | Block Group 3, Census Tract 2410, Harris County, Texas | 30.5% |
| 482012410004 | Block Group 4, Census Tract 2410, Harris County, Texas | 29.6% |
| 482012411011 | Block Group 1, Census Tract 2411.01, Harris County, Texas | 46.7% |
| 482012411012 | Block Group 2, Census Tract 2411.01, Harris County, Texas | 24.0% |
| 482012411021 | Block Group 1, Census Tract 2411.02, Harris County, Texas | 30.6% |
| 482012411022 | Block Group 2, Census Tract 2411.02, Harris County, Texas | 27.5% |
| 482012411023 | Block Group 3, Census Tract 2411.02, Harris County, Texas | 33.8% |
| 482012411024 | Block Group 4, Census Tract 2411.02, Harris County, Texas | 22.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012411025 | Block Group 5, Census Tract 2411.02, Harris County, Texas | 33.8% |
| 482012411031 | Block Group 1, Census Tract 2411.03, Harris County, Texas | 67.8% |
| 482012411032 | Block Group 2, Census Tract 2411.03, Harris County, Texas | 23.3% |
| 482012412001 | Block Group 1, Census Tract 2412, Harris County, Texas | 47.9% |
| 482012412002 | Block Group 2, Census Tract 2412, Harris County, Texas | 10.6% |
| 482012412003 | Block Group 3, Census Tract 2412, Harris County, Texas | 40.4% |
| 482012413001 | Block Group 1, Census Tract 2413, Harris County, Texas | 10.1% |
| 482012413002 | Block Group 2, Census Tract 2413, Harris County, Texas | 15.5% |
| 482012413003 | Block Group 3, Census Tract 2413, Harris County, Texas | 29.7% |
| 482012414001 | Block Group 1, Census Tract 2414, Harris County, Texas | 15.2% |
| 482012414002 | Block Group 2, Census Tract 2414, Harris County, Texas | 14.3% |
| 482012414003 | Block Group 3, Census Tract 2414, Harris County, Texas | 23.2% |
| 482012415001 | Block Group 1, Census Tract 2415, Harris County, Texas | 70.6% |
| 482012415002 | Block Group 2, Census Tract 2415, Harris County, Texas | 51.7% |
| 482012415003 | Block Group 3, Census Tract 2415, Harris County, Texas | 72.3% |
| 482012415004 | Block Group 4, Census Tract 2415, Harris County, Texas | 58.1% |
| 482012501001 | Block Group 1, Census Tract 2501, Harris County, Texas | 15.1% |
| 482012501002 | Block Group 2, Census Tract 2501, Harris County, Texas | 52.0% |
| 482012501003 | Block Group 3, Census Tract 2501, Harris County, Texas | 29.8% |
| 482012502001 | Block Group 1, Census Tract 2502, Harris County, Texas | 45.6% |
| 482012502002 | Block Group 2, Census Tract 2502, Harris County, Texas | 51.0% |
| 482012503011 | Block Group 1, Census Tract 2503.01, Harris County, Texas | 12.2% |
| 482012503012 | Block Group 2, Census Tract 2503.01, Harris County, Texas | 48.0% |
| 482012503021 | Block Group 1, Census Tract 2503.02, Harris County, Texas | 13.2% |
| 482012503022 | Block Group 2, Census Tract 2503.02, Harris County, Texas | 35.6% |
| 482012503023 | Block Group 3, Census Tract 2503.02, Harris County, Texas | 21.2% |
| 482012504011 | Block Group 1, Census Tract 2504.01, Harris County, Texas | 13.9% |
| 482012504012 | Block Group 2, Census Tract 2504.01, Harris County, Texas | 13.4% |
| 482012504021 | Block Group 1, Census Tract 2504.02, Harris County, Texas | 8.2% |
| 482012504022 | Block Group 2, Census Tract 2504.02, Harris County, Texas | 37.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012504023 | Block Group 3, Census Tract 2504.02, Harris County, Texas | 17.2% |
| 482012505001 | Block Group 1, Census Tract 2505, Harris County, Texas | 30.2% |
| 482012505002 | Block Group 2, Census Tract 2505, Harris County, Texas | 31.7% |
| 482012506001 | Block Group 1, Census Tract 2506, Harris County, Texas | 68.5% |
| 482012506002 | Block Group 2, Census Tract 2506, Harris County, Texas | 78.6% |
| 482012506003 | Block Group 3, Census Tract 2506, Harris County, Texas | 73.8% |
| 482012506004 | Block Group 4, Census Tract 2506, Harris County, Texas | 77.9% |
| 482012506005 | Block Group 5, Census Tract 2506, Harris County, Texas | 52.5% |
| 482012507011 | Block Group 1, Census Tract 2507.01, Harris County, Texas | 21.0% |
| 482012507012 | Block Group 2, Census Tract 2507.01, Harris County, Texas | 10.3% |
| 482012507013 | Block Group 3, Census Tract 2507.01, Harris County, Texas | 33.2% |
| 482012507021 | Block Group 1, Census Tract 2507.02, Harris County, Texas | 13.6% |
| 482012507022 | Block Group 2, Census Tract 2507.02, Harris County, Texas | 8.7% |
| 482012508001 | Block Group 1, Census Tract 2508, Harris County, Texas | 4.6% |
| 482012508002 | Block Group 2, Census Tract 2508, Harris County, Texas | 32.2% |
| 482012508003 | Block Group 3, Census Tract 2508, Harris County, Texas | 5.7% |
| 482012509001 | Block Group 1, Census Tract 2509, Harris County, Texas | 1.6% |
| 482012509002 | Block Group 2, Census Tract 2509, Harris County, Texas | 13.6% |
| 482012509003 | Block Group 3, Census Tract 2509, Harris County, Texas | 1.8% |
| 482012509004 | Block Group 4, Census Tract 2509, Harris County, Texas | 1.8% |
| 482012510001 | Block Group 1, Census Tract 2510, Harris County, Texas | 24.9% |
| 482012510002 | Block Group 2, Census Tract 2510, Harris County, Texas | 12.2% |
| 482012511001 | Block Group 1, Census Tract 2511, Harris County, Texas | 20.1% |
| 482012511002 | Block Group 2, Census Tract 2511, Harris County, Texas | 35.1% |
| 482012511003 | Block Group 3, Census Tract 2511, Harris County, Texas | 7.0% |
| 482012511004 | Block Group 4, Census Tract 2511, Harris County, Texas | 27.6% |
| 482012511005 | Block Group 5, Census Tract 2511, Harris County, Texas | 38.2% |
| 482012512001 | Block Group 1, Census Tract 2512, Harris County, Texas | 31.4% |
| 482012512002 | Block Group 2, Census Tract 2512, Harris County, Texas | 9.7% |
| 482012512003 | Block Group 3, Census Tract 2512, Harris County, Texas | 17.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012513001 | Block Group 1, Census Tract 2513, Harris County, Texas | 21.9% |
| 482012513002 | Block Group 2, Census Tract 2513, Harris County, Texas | 7.7% |
| 482012513003 | Block Group 3, Census Tract 2513, Harris County, Texas | 0.0% |
| 482012513004 | Block Group 4, Census Tract 2513, Harris County, Texas | 6.3% |
| 482012513005 | Block Group 5, Census Tract 2513, Harris County, Texas | 19.6% |
| 482012514011 | Block Group 1, Census Tract 2514.01, Harris County, Texas | 1.2% |
| 482012514021 | Block Group 1, Census Tract 2514.02, Harris County, Texas | 35.5% |
| 482012514022 | Block Group 2, Census Tract 2514.02, Harris County, Texas | 18.9% |
| 482012514023 | Block Group 3, Census Tract 2514.02, Harris County, Texas | 24.9% |
| 482012515011 | Block Group 1, Census Tract 2515.01, Harris County, Texas | 9.0% |
| 482012515021 | Block Group 1, Census Tract 2515.02, Harris County, Texas | 2.9% |
| 482012515022 | Block Group 2, Census Tract 2515.02, Harris County, Texas | 4.0% |
| 482012515023 | Block Group 3, Census Tract 2515.02, Harris County, Texas | 17.1% |
| 482012515024 | Block Group 4, Census Tract 2515.02, Harris County, Texas | 3.3% |
| 482012515025 | Block Group 5, Census Tract 2515.02, Harris County, Texas | 9.9% |
| 482012515026 | Block Group 6, Census Tract 2515.02, Harris County, Texas | 37.6% |
| 482012515031 | Block Group 1, Census Tract 2515.03, Harris County, Texas | 6.1% |
| 482012516001 | Block Group 1, Census Tract 2516, Harris County, Texas | 38.8% |
| 482012516002 | Block Group 2, Census Tract 2516, Harris County, Texas | 10.7% |
| 482012517001 | Block Group 1, Census Tract 2517, Harris County, Texas | 45.5% |
| 482012517002 | Block Group 2, Census Tract 2517, Harris County, Texas | 44.2% |
| 482012517003 | Block Group 3, Census Tract 2517, Harris County, Texas | 15.2% |
| 482012517004 | Block Group 4, Census Tract 2517, Harris County, Texas | 26.5% |
| 482012518001 | Block Group 1, Census Tract 2518, Harris County, Texas | 32.6% |
| 482012519011 | Block Group 1, Census Tract 2519.01, Harris County, Texas | 39.7% |
| 482012519012 | Block Group 2, Census Tract 2519.01, Harris County, Texas | 73.2% |
| 482012519013 | Block Group 3, Census Tract 2519.01, Harris County, Texas | 20.1% |
| 482012519014 | Block Group 4, Census Tract 2519.01, Harris County, Texas | 28.2% |
| 482012519021 | Block Group 1, Census Tract 2519.02, Harris County, Texas | 9.5% |
| 482012519022 | Block Group 2, Census Tract 2519.02, Harris County, Texas | 32.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012519023 | Block Group 3, Census Tract 2519.02, Harris County, Texas | 11.5% |
| 482012520001 | Block Group 1, Census Tract 2520, Harris County, Texas | 10.1% |
| 482012521001 | Block Group 1, Census Tract 2521, Harris County, Texas | 48.7% |
| 482012522001 | Block Group 1, Census Tract 2522, Harris County, Texas | 60.9% |
| 482012522002 | Block Group 2, Census Tract 2522, Harris County, Texas | 37.2% |
| 482012523011 | Block Group 1, Census Tract 2523.01, Harris County, Texas | 32.9% |
| 482012523012 | Block Group 2, Census Tract 2523.01, Harris County, Texas | 28.9% |
| 482012523013 | Block Group 3, Census Tract 2523.01, Harris County, Texas | 49.0% |
| 482012523021 | Block Group 1, Census Tract 2523.02, Harris County, Texas | 32.0% |
| 482012523022 | Block Group 2, Census Tract 2523.02, Harris County, Texas | 57.8% |
| 482012523023 | Block Group 3, Census Tract 2523.02, Harris County, Texas | 39.6% |
| 482012524001 | Block Group 1, Census Tract 2524, Harris County, Texas | 78.4% |
| 482012524002 | Block Group 2, Census Tract 2524, Harris County, Texas | 34.1% |
| 482012524003 | Block Group 3, Census Tract 2524, Harris County, Texas | 87.7% |
| 482012524004 | Block Group 4, Census Tract 2524, Harris County, Texas | 16.8% |
| 482012525001 | Block Group 1, Census Tract 2525, Harris County, Texas | 69.4% |
| 482012525002 | Block Group 2, Census Tract 2525, Harris County, Texas | 71.1% |
| 482012525003 | Block Group 3, Census Tract 2525, Harris County, Texas | 45.0% |
| 482012525004 | Block Group 4, Census Tract 2525, Harris County, Texas | 62.3% |
| 482012526001 | Block Group 1, Census Tract 2526, Harris County, Texas | 78.1% |
| 482012526002 | Block Group 2, Census Tract 2526, Harris County, Texas | 52.7% |
| 482012526003 | Block Group 3, Census Tract 2526, Harris County, Texas | 60.6% |
| 482012526004 | Block Group 4, Census Tract 2526, Harris County, Texas | 55.8% |
| 482012527001 | Block Group 1, Census Tract 2527, Harris County, Texas | 44.1% |
| 482012527002 | Block Group 2, Census Tract 2527, Harris County, Texas | 50.2% |
| 482012527003 | Block Group 3, Census Tract 2527, Harris County, Texas | 10.0% |
| 482012528001 | Block Group 1, Census Tract 2528, Harris County, Texas | 73.4% |
| 482012528002 | Block Group 2, Census Tract 2528, Harris County, Texas | 41.5% |
| 482012528003 | Block Group 3, Census Tract 2528, Harris County, Texas | 51.0% |
| 482012529001 | Block Group 1, Census Tract 2529, Harris County, Texas | 26.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012529002 | Block Group 2, Census Tract 2529, Harris County, Texas | 38.8% |
| 482012529003 | Block Group 3, Census Tract 2529, Harris County, Texas | 28.2% |
| 482012529004 | Block Group 4, Census Tract 2529, Harris County, Texas | 47.9% |
| 482012529005 | Block Group 5, Census Tract 2529, Harris County, Texas | 52.8% |
| 482012530001 | Block Group 1, Census Tract 2530, Harris County, Texas | 64.5% |
| 482012530002 | Block Group 2, Census Tract 2530, Harris County, Texas | 67.1% |
| 482012530003 | Block Group 3, Census Tract 2530, Harris County, Texas | 45.3% |
| 482012531001 | Block Group 1, Census Tract 2531, Harris County, Texas | 21.6% |
| 482012531002 | Block Group 2, Census Tract 2531, Harris County, Texas | 21.9% |
| 482012532001 | Block Group 1, Census Tract 2532, Harris County, Texas | 65.9% |
| 482012532002 | Block Group 2, Census Tract 2532, Harris County, Texas | 70.8% |
| 482012532003 | Block Group 3, Census Tract 2532, Harris County, Texas | 19.1% |
| 482012532004 | Block Group 4, Census Tract 2532, Harris County, Texas | 17.1% |
| 482012532005 | Block Group 5, Census Tract 2532, Harris County, Texas | 15.0% |
| 482012533001 | Block Group 1, Census Tract 2533, Harris County, Texas | 11.6% |
| 482012533002 | Block Group 2, Census Tract 2533, Harris County, Texas | 41.2% |
| 482012534001 | Block Group 1, Census Tract 2534, Harris County, Texas | 73.2% |
| 482012535001 | Block Group 1, Census Tract 2535, Harris County, Texas | 25.4% |
| 482012535002 | Block Group 2, Census Tract 2535, Harris County, Texas | 51.7% |
| 482012535003 | Block Group 3, Census Tract 2535, Harris County, Texas | 73.6% |
| 482012535004 | Block Group 4, Census Tract 2535, Harris County, Texas | 18.5% |
| 482012536001 | Block Group 1, Census Tract 2536, Harris County, Texas | 23.7% |
| 482012536002 | Block Group 2, Census Tract 2536, Harris County, Texas | 67.1% |
| 482012536003 | Block Group 3, Census Tract 2536, Harris County, Texas | 15.2% |
| 482012536004 | Block Group 4, Census Tract 2536, Harris County, Texas | 91.6% |
| 482012537001 | Block Group 1, Census Tract 2537, Harris County, Texas | 37.8% |
| 482012537002 | Block Group 2, Census Tract 2537, Harris County, Texas | 28.5% |
| 482012537003 | Block Group 3, Census Tract 2537, Harris County, Texas | 41.9% |
| 482012537004 | Block Group 4, Census Tract 2537, Harris County, Texas | 40.3% |
| 482012538001 | Block Group 1, Census Tract 2538, Harris County, Texas | 51.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482012538002 | Block Group 2, Census Tract 2538, Harris County, Texas | 26.1% |
| 482012538003 | Block Group 3, Census Tract 2538, Harris County, Texas | 64.2% |
| 482012538004 | Block Group 4, Census Tract 2538, Harris County, Texas | 64.0% |
| 482012539001 | Block Group 1, Census Tract 2539, Harris County, Texas | 51.8% |
| 482012539002 | Block Group 2, Census Tract 2539, Harris County, Texas | 51.6% |
| 482012539003 | Block Group 3, Census Tract 2539, Harris County, Texas | 23.7% |
| 482012540001 | Block Group 1, Census Tract 2540, Harris County, Texas | 70.4% |
| 482012540002 | Block Group 2, Census Tract 2540, Harris County, Texas | 37.9% |
| 482012541001 | Block Group 1, Census Tract 2541, Harris County, Texas | 80.0% |
| 482012541002 | Block Group 2, Census Tract 2541, Harris County, Texas | 48.7% |
| 482012541003 | Block Group 3, Census Tract 2541, Harris County, Texas | 83.4% |
| 482012541004 | Block Group 4, Census Tract 2541, Harris County, Texas | 80.3% |
| 482012542001 | Block Group 1, Census Tract 2542, Harris County, Texas | 50.9% |
| 482012542002 | Block Group 2, Census Tract 2542, Harris County, Texas | 49.0% |
| 482012542003 | Block Group 3, Census Tract 2542, Harris County, Texas | 80.3% |
| 482012543001 | Block Group 1, Census Tract 2543, Harris County, Texas | 42.8% |
| 482012543002 | Block Group 2, Census Tract 2543, Harris County, Texas | 63.3% |
| 482012543003 | Block Group 3, Census Tract 2543, Harris County, Texas | 65.4% |
| 482012543004 | Block Group 4, Census Tract 2543, Harris County, Texas | 60.2% |
| 482012544001 | Block Group 1, Census Tract 2544, Harris County, Texas | 60.6% |
| 482012544002 | Block Group 2, Census Tract 2544, Harris County, Texas | 59.6% |
| 482012544003 | Block Group 3, Census Tract 2544, Harris County, Texas | 69.4% |
| 482012544004 | Block Group 4, Census Tract 2544, Harris County, Texas | 33.3% |
| 482012545001 | Block Group 1, Census Tract 2545, Harris County, Texas | 63.4% |
| 482012545002 | Block Group 2, Census Tract 2545, Harris County, Texas | 58.3% |
| 482012546001 | Block Group 1, Census Tract 2546, Harris County, Texas | 55.2% |
| 482012546002 | Block Group 2, Census Tract 2546, Harris County, Texas | 51.8% |
| 482012546003 | Block Group 3, Census Tract 2546, Harris County, Texas | 59.6% |
| 482012547001 | Block Group 1, Census Tract 2547, Harris County, Texas | 27.5% |
| 482013101001 | Block Group 1, Census Tract 3101, Harris County, Texas | 75.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013101002 | Block Group 2, Census Tract 3101, Harris County, Texas | 47.5% |
| 482013102001 | Block Group 1, Census Tract 3102, Harris County, Texas | 41.7% |
| 482013103001 | Block Group 1, Census Tract 3103, Harris County, Texas | 57.4% |
| 482013103002 | Block Group 2, Census Tract 3103, Harris County, Texas | 60.6% |
| 482013103003 | Block Group 3, Census Tract 3103, Harris County, Texas | 51.1% |
| 482013103004 | Block Group 4, Census Tract 3103, Harris County, Texas | 44.5% |
| 482013103005 | Block Group 5, Census Tract 3103, Harris County, Texas | 59.2% |
| 482013103006 | Block Group 6, Census Tract 3103, Harris County, Texas | 67.6% |
| 482013104001 | Block Group 1, Census Tract 3104, Harris County, Texas | 65.6% |
| 482013104002 | Block Group 2, Census Tract 3104, Harris County, Texas | 91.8% |
| 482013104003 | Block Group 3, Census Tract 3104, Harris County, Texas | 63.9% |
| 482013105001 | Block Group 1, Census Tract 3105, Harris County, Texas | 47.8% |
| 482013105002 | Block Group 2, Census Tract 3105, Harris County, Texas | 78.9% |
| 482013105003 | Block Group 3, Census Tract 3105, Harris County, Texas | 76.5% |
| 482013106001 | Block Group 1, Census Tract 3106, Harris County, Texas | 58.0% |
| 482013106002 | Block Group 2, Census Tract 3106, Harris County, Texas | 62.7% |
| 482013106003 | Block Group 3, Census Tract 3106, Harris County, Texas | 78.8% |
| 482013106004 | Block Group 4, Census Tract 3106, Harris County, Texas | 49.5% |
| 482013106005 | Block Group 5, Census Tract 3106, Harris County, Texas | 77.5% |
| 482013107001 | Block Group 1, Census Tract 3107, Harris County, Texas | 65.4% |
| 482013107002 | Block Group 2, Census Tract 3107, Harris County, Texas | 69.1% |
| 482013108001 | Block Group 1, Census Tract 3108, Harris County, Texas | 84.7% |
| 482013108002 | Block Group 2, Census Tract 3108, Harris County, Texas | 64.5% |
| 482013109001 | Block Group 1, Census Tract 3109, Harris County, Texas | 56.2% |
| 482013109002 | Block Group 2, Census Tract 3109, Harris County, Texas | 54.3% |
| 482013109003 | Block Group 3, Census Tract 3109, Harris County, Texas | 71.6% |
| 482013109004 | Block Group 4, Census Tract 3109, Harris County, Texas | 77.4% |
| 482013109005 | Block Group 5, Census Tract 3109, Harris County, Texas | 68.1% |
| 482013110001 | Block Group 1, Census Tract 3110, Harris County, Texas | 63.4% |
| 482013110002 | Block Group 2, Census Tract 3110, Harris County, Texas | 76.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013110003 | Block Group 3, Census Tract 3110, Harris County, Texas | 83.5% |
| 482013110004 | Block Group 4, Census Tract 3110, Harris County, Texas | 78.2% |
| 482013110005 | Block Group 5, Census Tract 3110, Harris County, Texas | 55.3% |
| 482013111001 | Block Group 1, Census Tract 3111, Harris County, Texas | 78.7% |
| 482013111002 | Block Group 2, Census Tract 3111, Harris County, Texas | 49.8% |
| 482013111003 | Block Group 3, Census Tract 3111, Harris County, Texas | 82.2% |
| 482013111004 | Block Group 4, Census Tract 3111, Harris County, Texas | 73.2% |
| 482013112001 | Block Group 1, Census Tract 3112, Harris County, Texas | 62.8% |
| 482013112002 | Block Group 2, Census Tract 3112, Harris County, Texas | 84.3% |
| 482013112003 | Block Group 3, Census Tract 3112, Harris County, Texas | 52.1% |
| 482013113001 | Block Group 1, Census Tract 3113, Harris County, Texas | 65.2% |
| 482013113002 | Block Group 2, Census Tract 3113, Harris County, Texas | 48.1% |
| 482013113003 | Block Group 3, Census Tract 3113, Harris County, Texas | 69.0% |
| 482013114001 | Block Group 1, Census Tract 3114, Harris County, Texas | 73.7% |
| 482013115001 | Block Group 1, Census Tract 3115, Harris County, Texas | 68.9% |
| 482013115002 | Block Group 2, Census Tract 3115, Harris County, Texas | 82.5% |
| 482013115003 | Block Group 3, Census Tract 3115, Harris County, Texas | 59.0% |
| 482013115004 | Block Group 4, Census Tract 3115, Harris County, Texas | 38.1% |
| 482013116001 | Block Group 1, Census Tract 3116, Harris County, Texas | 91.6% |
| 482013116002 | Block Group 2, Census Tract 3116, Harris County, Texas | 84.4% |
| 482013116003 | Block Group 3, Census Tract 3116, Harris County, Texas | 65.0% |
| 482013117001 | Block Group 1, Census Tract 3117, Harris County, Texas | 85.9% |
| 482013117002 | Block Group 2, Census Tract 3117, Harris County, Texas | 64.4% |
| 482013118001 | Block Group 1, Census Tract 3118, Harris County, Texas | 78.6% |
| 482013118002 | Block Group 2, Census Tract 3118, Harris County, Texas | 38.6% |
| 482013118003 | Block Group 3, Census Tract 3118, Harris County, Texas | 75.3% |
| 482013119001 | Block Group 1, Census Tract 3119, Harris County, Texas | 30.0% |
| 482013119002 | Block Group 2, Census Tract 3119, Harris County, Texas | 69.4% |
| 482013120001 | Block Group 1, Census Tract 3120, Harris County, Texas | 43.3% |
| 482013120002 | Block Group 2, Census Tract 3120, Harris County, Texas | 62.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013121001 | Block Group 1, Census Tract 3121, Harris County, Texas | 0.0% |
| 482013122001 | Block Group 1, Census Tract 3122, Harris County, Texas | 95.6% |
| 482013122002 | Block Group 2, Census Tract 3122, Harris County, Texas | 95.9% |
| 482013122003 | Block Group 3, Census Tract 3122, Harris County, Texas | 91.1% |
| 482013123001 | Block Group 1, Census Tract 3123, Harris County, Texas | 72.9% |
| 482013123002 | Block Group 2, Census Tract 3123, Harris County, Texas | 98.5% |
| 482013124001 | Block Group 1, Census Tract 3124, Harris County, Texas | 100.0% |
| 482013124002 | Block Group 2, Census Tract 3124, Harris County, Texas | 83.5% |
| 482013124003 | Block Group 3, Census Tract 3124, Harris County, Texas | 81.4% |
| 482013125001 | Block Group 1, Census Tract 3125, Harris County, Texas | 19.9% |
| 482013125002 | Block Group 2, Census Tract 3125, Harris County, Texas | 34.8% |
| 482013126001 | Block Group 1, Census Tract 3126, Harris County, Texas | 41.2% |
| 482013126002 | Block Group 2, Census Tract 3126, Harris County, Texas | 27.6% |
| 482013126003 | Block Group 3, Census Tract 3126, Harris County, Texas | 77.3% |
| 482013126004 | Block Group 4, Census Tract 3126, Harris County, Texas | 22.3% |
| 482013127001 | Block Group 1, Census Tract 3127, Harris County, Texas | 16.9% |
| 482013127002 | Block Group 2, Census Tract 3127, Harris County, Texas | 56.3% |
| 482013127003 | Block Group 3, Census Tract 3127, Harris County, Texas | 74.7% |
| 482013128001 | Block Group 1, Census Tract 3128, Harris County, Texas | 96.0% |
| 482013128002 | Block Group 2, Census Tract 3128, Harris County, Texas | 82.4% |
| 482013129001 | Block Group 1, Census Tract 3129, Harris County, Texas | 76.3% |
| 482013129002 | Block Group 2, Census Tract 3129, Harris County, Texas | 45.7% |
| 482013130001 | Block Group 1, Census Tract 3130, Harris County, Texas | 43.1% |
| 482013130002 | Block Group 2, Census Tract 3130, Harris County, Texas | 55.1% |
| 482013130003 | Block Group 3, Census Tract 3130, Harris County, Texas | 49.7% |
| 482013131001 | Block Group 1, Census Tract 3131, Harris County, Texas | 22.4% |
| 482013131002 | Block Group 2, Census Tract 3131, Harris County, Texas | 18.8% |
| 482013132001 | Block Group 1, Census Tract 3132, Harris County, Texas | 22.8% |
| 482013132002 | Block Group 2, Census Tract 3132, Harris County, Texas | 65.7% |
| 482013132003 | Block Group 3, Census Tract 3132, Harris County, Texas | 71.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013132004 | Block Group 4, Census Tract 3132, Harris County, Texas | 45.6% |
| 482013133001 | Block Group 1, Census Tract 3133, Harris County, Texas | 69.1% |
| 482013133002 | Block Group 2, Census Tract 3133, Harris County, Texas | 47.8% |
| 482013134001 | Block Group 1, Census Tract 3134, Harris County, Texas | 62.0% |
| 482013134002 | Block Group 2, Census Tract 3134, Harris County, Texas | 79.7% |
| 482013135001 | Block Group 1, Census Tract 3135, Harris County, Texas | 64.5% |
| 482013135002 | Block Group 2, Census Tract 3135, Harris County, Texas | 73.5% |
| 482013135003 | Block Group 3, Census Tract 3135, Harris County, Texas | 15.6% |
| 482013136001 | Block Group 1, Census Tract 3136, Harris County, Texas | 63.8% |
| 482013136002 | Block Group 2, Census Tract 3136, Harris County, Texas | 86.7% |
| 482013136003 | Block Group 3, Census Tract 3136, Harris County, Texas | 64.8% |
| 482013137001 | Block Group 1, Census Tract 3137, Harris County, Texas | 51.1% |
| 482013137002 | Block Group 2, Census Tract 3137, Harris County, Texas | 50.6% |
| 482013138001 | Block Group 1, Census Tract 3138, Harris County, Texas | 89.7% |
| 482013138002 | Block Group 2, Census Tract 3138, Harris County, Texas | 70.9% |
| 482013138003 | Block Group 3, Census Tract 3138, Harris County, Texas | 66.2% |
| 482013138004 | Block Group 4, Census Tract 3138, Harris County, Texas | 78.1% |
| 482013139001 | Block Group 1, Census Tract 3139, Harris County, Texas | 35.8% |
| 482013139002 | Block Group 2, Census Tract 3139, Harris County, Texas | 53.4% |
| 482013139003 | Block Group 3, Census Tract 3139, Harris County, Texas | 29.2% |
| 482013140011 | Block Group 1, Census Tract 3140.01, Harris County, Texas | 87.1% |
| 482013140012 | Block Group 2, Census Tract 3140.01, Harris County, Texas | 59.6% |
| 482013140013 | Block Group 3, Census Tract 3140.01, Harris County, Texas | 42.5% |
| 482013140021 | Block Group 1, Census Tract 3140.02, Harris County, Texas | 65.5% |
| 482013140022 | Block Group 2, Census Tract 3140.02, Harris County, Texas | 58.7% |
| 482013140023 | Block Group 3, Census Tract 3140.02, Harris County, Texas | 25.3% |
| 482013140024 | Block Group 4, Census Tract 3140.02, Harris County, Texas | 74.1% |
| 482013140025 | Block Group 5, Census Tract 3140.02, Harris County, Texas | 54.6% |
| 482013143001 | Block Group 1, Census Tract 3143, Harris County, Texas | 60.8% |
| 482013143002 | Block Group 2, Census Tract 3143, Harris County, Texas | 79.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013143003 | Block Group 3, Census Tract 3143, Harris County, Texas | 76.4% |
| 482013144001 | Block Group 1, Census Tract 3144, Harris County, Texas | 23.7% |
| 482013144002 | Block Group 2, Census Tract 3144, Harris County, Texas | 49.1% |
| 482013201001 | Block Group 1, Census Tract 3201, Harris County, Texas | 73.1% |
| 482013201002 | Block Group 2, Census Tract 3201, Harris County, Texas | 53.5% |
| 482013202001 | Block Group 1, Census Tract 3202, Harris County, Texas | 56.2% |
| 482013202002 | Block Group 2, Census Tract 3202, Harris County, Texas | 80.3% |
| 482013202003 | Block Group 3, Census Tract 3202, Harris County, Texas | 51.8% |
| 482013202004 | Block Group 4, Census Tract 3202, Harris County, Texas | 87.3% |
| 482013205001 | Block Group 1, Census Tract 3205, Harris County, Texas | 64.4% |
| 482013205002 | Block Group 2, Census Tract 3205, Harris County, Texas | 38.0% |
| 482013206011 | Block Group 1, Census Tract 3206.01, Harris County, Texas | 59.9% |
| 482013206021 | Block Group 1, Census Tract 3206.02, Harris County, Texas | 79.3% |
| 482013206022 | Block Group 2, Census Tract 3206.02, Harris County, Texas | 51.2% |
| 482013206023 | Block Group 3, Census Tract 3206.02, Harris County, Texas | 91.6% |
| 482013207001 | Block Group 1, Census Tract 3207, Harris County, Texas | 59.5% |
| 482013207002 | Block Group 2, Census Tract 3207, Harris County, Texas | 63.9% |
| 482013208001 | Block Group 1, Census Tract 3208, Harris County, Texas | 84.8% |
| 482013208002 | Block Group 2, Census Tract 3208, Harris County, Texas | 84.7% |
| 482013208003 | Block Group 3, Census Tract 3208, Harris County, Texas | 49.2% |
| 482013209001 | Block Group 1, Census Tract 3209, Harris County, Texas | 81.6% |
| 482013209002 | Block Group 2, Census Tract 3209, Harris County, Texas | 62.3% |
| 482013209003 | Block Group 3, Census Tract 3209, Harris County, Texas | 44.1% |
| 482013209004 | Block Group 4, Census Tract 3209, Harris County, Texas | 52.6% |
| 482013210001 | Block Group 1, Census Tract 3210, Harris County, Texas | 34.0% |
| 482013210002 | Block Group 2, Census Tract 3210, Harris County, Texas | 68.4% |
| 482013210003 | Block Group 3, Census Tract 3210, Harris County, Texas | 74.6% |
| 482013210004 | Block Group 4, Census Tract 3210, Harris County, Texas | 61.4% |
| 482013210005 | Block Group 5, Census Tract 3210, Harris County, Texas | 36.7% |
| 482013211001 | Block Group 1, Census Tract 3211, Harris County, Texas | 55.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013211002 | Block Group 2, Census Tract 3211, Harris County, Texas | 39.8% |
| 482013211003 | Block Group 3, Census Tract 3211, Harris County, Texas | 83.1% |
| 482013212001 | Block Group 1, Census Tract 3212, Harris County, Texas | 83.5% |
| 482013212002 | Block Group 2, Census Tract 3212, Harris County, Texas | 69.8% |
| 482013213001 | Block Group 1, Census Tract 3213, Harris County, Texas | 67.8% |
| 482013213002 | Block Group 2, Census Tract 3213, Harris County, Texas | 79.0% |
| 482013213003 | Block Group 3, Census Tract 3213, Harris County, Texas | 40.6% |
| 482013214011 | Block Group 1, Census Tract 3214.01, Harris County, Texas | 56.1% |
| 482013214012 | Block Group 2, Census Tract 3214.01, Harris County, Texas | 54.9% |
| 482013214021 | Block Group 1, Census Tract 3214.02, Harris County, Texas | 42.2% |
| 482013214022 | Block Group 2, Census Tract 3214.02, Harris County, Texas | 11.2% |
| 482013214023 | Block Group 3, Census Tract 3214.02, Harris County, Texas | 62.7% |
| 482013215001 | Block Group 1, Census Tract 3215, Harris County, Texas | 68.6% |
| 482013216001 | Block Group 1, Census Tract 3216, Harris County, Texas | 46.0% |
| 482013216002 | Block Group 2, Census Tract 3216, Harris County, Texas | 20.4% |
| 482013216003 | Block Group 3, Census Tract 3216, Harris County, Texas | 52.2% |
| 482013216004 | Block Group 4, Census Tract 3216, Harris County, Texas | 38.7% |
| 482013216005 | Block Group 5, Census Tract 3216, Harris County, Texas | 62.3% |
| 482013217001 | Block Group 1, Census Tract 3217, Harris County, Texas | 37.5% |
| 482013217002 | Block Group 2, Census Tract 3217, Harris County, Texas | 37.8% |
| 482013218001 | Block Group 1, Census Tract 3218, Harris County, Texas | 59.0% |
| 482013218002 | Block Group 2, Census Tract 3218, Harris County, Texas | 66.6% |
| 482013219001 | Block Group 1, Census Tract 3219, Harris County, Texas | 86.7% |
| 482013219002 | Block Group 2, Census Tract 3219, Harris County, Texas | 75.8% |
| 482013219003 | Block Group 3, Census Tract 3219, Harris County, Texas | 60.2% |
| 482013219004 | Block Group 4, Census Tract 3219, Harris County, Texas | 42.2% |
| 482013220001 | Block Group 1, Census Tract 3220, Harris County, Texas | 92.1% |
| 482013220002 | Block Group 2, Census Tract 3220, Harris County, Texas | 56.5% |
| 482013220003 | Block Group 3, Census Tract 3220, Harris County, Texas | 87.5% |
| 482013221001 | Block Group 1, Census Tract 3221, Harris County, Texas | 68.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013221002 | Block Group 2, Census Tract 3221, Harris County, Texas | 60.4% |
| 482013221003 | Block Group 3, Census Tract 3221, Harris County, Texas | 66.5% |
| 482013222001 | Block Group 1, Census Tract 3222, Harris County, Texas | 53.5% |
| 482013226001 | Block Group 1, Census Tract 3226, Harris County, Texas | 19.9% |
| 482013226002 | Block Group 2, Census Tract 3226, Harris County, Texas | 31.6% |
| 482013226003 | Block Group 3, Census Tract 3226, Harris County, Texas | 47.5% |
| 482013227001 | Block Group 1, Census Tract 3227, Harris County, Texas | 37.0% |
| 482013227002 | Block Group 2, Census Tract 3227, Harris County, Texas | 85.4% |
| 482013227003 | Block Group 3, Census Tract 3227, Harris County, Texas | 56.7% |
| 482013227004 | Block Group 4, Census Tract 3227, Harris County, Texas | 69.1% |
| 482013228001 | Block Group 1, Census Tract 3228, Harris County, Texas | 74.0% |
| 482013228002 | Block Group 2, Census Tract 3228, Harris County, Texas | 52.3% |
| 482013228003 | Block Group 3, Census Tract 3228, Harris County, Texas | 70.1% |
| 482013228004 | Block Group 4, Census Tract 3228, Harris County, Texas | 62.4% |
| 482013229001 | Block Group 1, Census Tract 3229, Harris County, Texas | 69.1% |
| 482013229002 | Block Group 2, Census Tract 3229, Harris County, Texas | 22.4% |
| 482013229003 | Block Group 3, Census Tract 3229, Harris County, Texas | 40.6% |
| 482013230001 | Block Group 1, Census Tract 3230, Harris County, Texas | 78.4% |
| 482013230002 | Block Group 2, Census Tract 3230, Harris County, Texas | 67.0% |
| 482013230003 | Block Group 3, Census Tract 3230, Harris County, Texas | 85.8% |
| 482013231001 | Block Group 1, Census Tract 3231, Harris County, Texas | 65.7% |
| 482013231002 | Block Group 2, Census Tract 3231, Harris County, Texas | 70.9% |
| 482013232001 | Block Group 1, Census Tract 3232, Harris County, Texas | 41.3% |
| 482013232002 | Block Group 2, Census Tract 3232, Harris County, Texas | 59.8% |
| 482013232003 | Block Group 3, Census Tract 3232, Harris County, Texas | 41.0% |
| 482013232004 | Block Group 4, Census Tract 3232, Harris County, Texas | 51.5% |
| 482013233001 | Block Group 1, Census Tract 3233, Harris County, Texas | 70.3% |
| 482013233002 | Block Group 2, Census Tract 3233, Harris County, Texas | 54.6% |
| 482013234001 | Block Group 1, Census Tract 3234, Harris County, Texas | 64.1% |
| 482013234002 | Block Group 2, Census Tract 3234, Harris County, Texas | 55.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013234003 | Block Group 3, Census Tract 3234, Harris County, Texas | 87.9% |
| 482013234004 | Block Group 4, Census Tract 3234, Harris County, Texas | 77.2% |
| 482013235001 | Block Group 1, Census Tract 3235, Harris County, Texas | 73.8% |
| 482013235002 | Block Group 2, Census Tract 3235, Harris County, Texas | 74.1% |
| 482013235003 | Block Group 3, Census Tract 3235, Harris County, Texas | 64.9% |
| 482013236001 | Block Group 1, Census Tract 3236, Harris County, Texas | 76.4% |
| 482013236002 | Block Group 2, Census Tract 3236, Harris County, Texas | 59.2% |
| 482013236003 | Block Group 3, Census Tract 3236, Harris County, Texas | 14.7% |
| 482013236004 | Block Group 4, Census Tract 3236, Harris County, Texas | 38.0% |
| 482013237011 | Block Group 1, Census Tract 3237.01, Harris County, Texas | 93.1% |
| 482013237012 | Block Group 2, Census Tract 3237.01, Harris County, Texas | 15.7% |
| 482013237013 | Block Group 3, Census Tract 3237.01, Harris County, Texas | 58.2% |
| 482013237021 | Block Group 1, Census Tract 3237.02, Harris County, Texas | 32.2% |
| 482013237022 | Block Group 2, Census Tract 3237.02, Harris County, Texas | 47.7% |
| 482013238011 | Block Group 1, Census Tract 3238.01, Harris County, Texas | 59.6% |
| 482013238012 | Block Group 2, Census Tract 3238.01, Harris County, Texas | 42.6% |
| 482013238021 | Block Group 1, Census Tract 3238.02, Harris County, Texas | 62.0% |
| 482013238022 | Block Group 2, Census Tract 3238.02, Harris County, Texas | 42.7% |
| 482013239001 | Block Group 1, Census Tract 3239, Harris County, Texas | 91.1% |
| 482013239002 | Block Group 2, Census Tract 3239, Harris County, Texas | 75.2% |
| 482013240001 | Block Group 1, Census Tract 3240, Harris County, Texas | 42.5% |
| 482013240002 | Block Group 2, Census Tract 3240, Harris County, Texas | 27.3% |
| 482013241001 | Block Group 1, Census Tract 3241, Harris County, Texas | 66.7% |
| 482013241002 | Block Group 2, Census Tract 3241, Harris County, Texas | 81.7% |
| 482013241003 | Block Group 3, Census Tract 3241, Harris County, Texas | 77.9% |
| 482013241004 | Block Group 4, Census Tract 3241, Harris County, Texas | 60.2% |
| 482013241005 | Block Group 5, Census Tract 3241, Harris County, Texas | 42.9% |
| 482013242001 | Block Group 1, Census Tract 3242, Harris County, Texas | 60.0% |
| 482013301001 | Block Group 1, Census Tract 3301, Harris County, Texas | 49.5% |
| 482013301002 | Block Group 2, Census Tract 3301, Harris County, Texas | 77.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013301003 | Block Group 3, Census Tract 3301, Harris County, Texas | 74.7% |
| 482013301004 | Block Group 4, Census Tract 3301, Harris County, Texas | 49.5% |
| 482013302001 | Block Group 1, Census Tract 3302, Harris County, Texas | 48.3% |
| 482013302002 | Block Group 2, Census Tract 3302, Harris County, Texas | 49.2% |
| 482013303011 | Block Group 1, Census Tract 3303.01, Harris County, Texas | 49.8% |
| 482013303012 | Block Group 2, Census Tract 3303.01, Harris County, Texas | 43.0% |
| 482013303021 | Block Group 1, Census Tract 3303.02, Harris County, Texas | 55.9% |
| 482013303022 | Block Group 2, Census Tract 3303.02, Harris County, Texas | 64.8% |
| 482013303023 | Block Group 3, Census Tract 3303.02, Harris County, Texas | 52.7% |
| 482013303031 | Block Group 1, Census Tract 3303.03, Harris County, Texas | 92.3% |
| 482013303032 | Block Group 2, Census Tract 3303.03, Harris County, Texas | 36.1% |
| 482013303033 | Block Group 3, Census Tract 3303.03, Harris County, Texas | 24.6% |
| 482013304001 | Block Group 1, Census Tract 3304, Harris County, Texas | 62.8% |
| 482013304002 | Block Group 2, Census Tract 3304, Harris County, Texas | 54.2% |
| 482013304003 | Block Group 3, Census Tract 3304, Harris County, Texas | 70.7% |
| 482013305001 | Block Group 1, Census Tract 3305, Harris County, Texas | 80.6% |
| 482013305002 | Block Group 2, Census Tract 3305, Harris County, Texas | 33.4% |
| 482013305003 | Block Group 3, Census Tract 3305, Harris County, Texas | 56.5% |
| 482013306001 | Block Group 1, Census Tract 3306, Harris County, Texas | 56.3% |
| 482013306002 | Block Group 2, Census Tract 3306, Harris County, Texas | 52.1% |
| 482013306003 | Block Group 3, Census Tract 3306, Harris County, Texas | 39.1% |
| 482013306004 | Block Group 4, Census Tract 3306, Harris County, Texas | 53.4% |
| 482013307001 | Block Group 1, Census Tract 3307, Harris County, Texas | 73.0% |
| 482013307002 | Block Group 2, Census Tract 3307, Harris County, Texas | 52.5% |
| 482013307003 | Block Group 3, Census Tract 3307, Harris County, Texas | 79.3% |
| 482013308001 | Block Group 1, Census Tract 3308, Harris County, Texas | 66.0% |
| 482013308002 | Block Group 2, Census Tract 3308, Harris County, Texas | 32.4% |
| 482013309001 | Block Group 1, Census Tract 3309, Harris County, Texas | 32.5% |
| 482013309002 | Block Group 2, Census Tract 3309, Harris County, Texas | 61.2% |
| 482013309003 | Block Group 3, Census Tract 3309, Harris County, Texas | 49.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013311001 | Block Group 1, Census Tract 3311, Harris County, Texas | 68.9% |
| 482013311002 | Block Group 2, Census Tract 3311, Harris County, Texas | 35.1% |
| 482013311003 | Block Group 3, Census Tract 3311, Harris County, Texas | 86.7% |
| 482013311004 | Block Group 4, Census Tract 3311, Harris County, Texas | 86.8% |
| 482013312001 | Block Group 1, Census Tract 3312, Harris County, Texas | 76.8% |
| 482013312002 | Block Group 2, Census Tract 3312, Harris County, Texas | 87.5% |
| 482013313001 | Block Group 1, Census Tract 3313, Harris County, Texas | 46.2% |
| 482013313002 | Block Group 2, Census Tract 3313, Harris County, Texas | 94.7% |
| 482013313003 | Block Group 3, Census Tract 3313, Harris County, Texas | 60.6% |
| 482013313004 | Block Group 4, Census Tract 3313, Harris County, Texas | 61.5% |
| 482013314001 | Block Group 1, Census Tract 3314, Harris County, Texas | 81.8% |
| 482013315001 | Block Group 1, Census Tract 3315, Harris County, Texas | 84.1% |
| 482013315002 | Block Group 2, Census Tract 3315, Harris County, Texas | 73.2% |
| 482013315003 | Block Group 3, Census Tract 3315, Harris County, Texas | 47.5% |
| 482013315004 | Block Group 4, Census Tract 3315, Harris County, Texas | 46.4% |
| 482013315005 | Block Group 5, Census Tract 3315, Harris County, Texas | 40.7% |
| 482013315006 | Block Group 6, Census Tract 3315, Harris County, Texas | 58.0% |
| 482013316011 | Block Group 1, Census Tract 3316.01, Harris County, Texas | 52.5% |
| 482013316012 | Block Group 2, Census Tract 3316.01, Harris County, Texas | 69.1% |
| 482013316013 | Block Group 3, Census Tract 3316.01, Harris County, Texas | 23.6% |
| 482013316014 | Block Group 4, Census Tract 3316.01, Harris County, Texas | 22.9% |
| 482013316021 | Block Group 1, Census Tract 3316.02, Harris County, Texas | 100.0% |
| 482013316022 | Block Group 2, Census Tract 3316.02, Harris County, Texas | 87.2% |
| 482013317001 | Block Group 1, Census Tract 3317, Harris County, Texas | 80.8% |
| 482013317002 | Block Group 2, Census Tract 3317, Harris County, Texas | 65.4% |
| 482013317003 | Block Group 3, Census Tract 3317, Harris County, Texas | 78.1% |
| 482013318001 | Block Group 1, Census Tract 3318, Harris County, Texas | 72.7% |
| 482013318002 | Block Group 2, Census Tract 3318, Harris County, Texas | 58.5% |
| 482013319001 | Block Group 1, Census Tract 3319, Harris County, Texas | 75.5% |
| 482013319002 | Block Group 2, Census Tract 3319, Harris County, Texas | 51.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013319003 | Block Group 3, Census Tract 3319, Harris County, Texas | 75.4% |
| 482013320001 | Block Group 1, Census Tract 3320, Harris County, Texas | 54.7% |
| 482013320002 | Block Group 2, Census Tract 3320, Harris County, Texas | 81.3% |
| 482013320003 | Block Group 3, Census Tract 3320, Harris County, Texas | 91.4% |
| 482013320004 | Block Group 4, Census Tract 3320, Harris County, Texas | 42.7% |
| 482013321001 | Block Group 1, Census Tract 3321, Harris County, Texas | 83.1% |
| 482013321002 | Block Group 2, Census Tract 3321, Harris County, Texas | 59.7% |
| 482013322001 | Block Group 1, Census Tract 3322, Harris County, Texas | 73.5% |
| 482013322002 | Block Group 2, Census Tract 3322, Harris County, Texas | 68.7% |
| 482013322003 | Block Group 3, Census Tract 3322, Harris County, Texas | 51.5% |
| 482013323001 | Block Group 1, Census Tract 3323, Harris County, Texas | 53.0% |
| 482013323002 | Block Group 2, Census Tract 3323, Harris County, Texas | 67.5% |
| 482013324001 | Block Group 1, Census Tract 3324, Harris County, Texas | 58.7% |
| 482013324002 | Block Group 2, Census Tract 3324, Harris County, Texas | 55.1% |
| 482013324003 | Block Group 3, Census Tract 3324, Harris County, Texas | 63.2% |
| 482013325001 | Block Group 1, Census Tract 3325, Harris County, Texas | 64.5% |
| 482013325002 | Block Group 2, Census Tract 3325, Harris County, Texas | 43.3% |
| 482013326001 | Block Group 1, Census Tract 3326, Harris County, Texas | 54.6% |
| 482013326002 | Block Group 2, Census Tract 3326, Harris County, Texas | 59.0% |
| 482013326003 | Block Group 3, Census Tract 3326, Harris County, Texas | 40.5% |
| 482013326004 | Block Group 4, Census Tract 3326, Harris County, Texas | 57.5% |
| 482013327001 | Block Group 1, Census Tract 3327, Harris County, Texas | 66.4% |
| 482013327002 | Block Group 2, Census Tract 3327, Harris County, Texas | 66.8% |
| 482013328001 | Block Group 1, Census Tract 3328, Harris County, Texas | 83.8% |
| 482013328002 | Block Group 2, Census Tract 3328, Harris County, Texas | 80.2% |
| 482013328003 | Block Group 3, Census Tract 3328, Harris County, Texas | 79.3% |
| 482013329001 | Block Group 1, Census Tract 3329, Harris County, Texas | 79.4% |
| 482013329002 | Block Group 2, Census Tract 3329, Harris County, Texas | 56.2% |
| 482013330001 | Block Group 1, Census Tract 3330, Harris County, Texas | 44.4% |
| 482013330002 | Block Group 2, Census Tract 3330, Harris County, Texas | 41.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013331001 | Block Group 1, Census Tract 3331, Harris County, Texas | 76.8% |
| 482013331002 | Block Group 2, Census Tract 3331, Harris County, Texas | 79.1% |
| 482013332011 | Block Group 1, Census Tract 3332.01, Harris County, Texas | 61.6% |
| 482013332012 | Block Group 2, Census Tract 3332.01, Harris County, Texas | 80.7% |
| 482013332013 | Block Group 3, Census Tract 3332.01, Harris County, Texas | 60.4% |
| 482013332021 | Block Group 1, Census Tract 3332.02, Harris County, Texas | 47.1% |
| 482013332022 | Block Group 2, Census Tract 3332.02, Harris County, Texas | 69.2% |
| 482013332023 | Block Group 3, Census Tract 3332.02, Harris County, Texas | 78.9% |
| 482013332024 | Block Group 4, Census Tract 3332.02, Harris County, Texas | 71.9% |
| 482013333001 | Block Group 1, Census Tract 3333, Harris County, Texas | 57.1% |
| 482013333002 | Block Group 2, Census Tract 3333, Harris County, Texas | 77.4% |
| 482013333003 | Block Group 3, Census Tract 3333, Harris County, Texas | 54.2% |
| 482013335001 | Block Group 1, Census Tract 3335, Harris County, Texas | 49.7% |
| 482013335002 | Block Group 2, Census Tract 3335, Harris County, Texas | 57.0% |
| 482013335003 | Block Group 3, Census Tract 3335, Harris County, Texas | 81.8% |
| 482013336001 | Block Group 1, Census Tract 3336, Harris County, Texas | 48.0% |
| 482013336002 | Block Group 2, Census Tract 3336, Harris County, Texas | 41.1% |
| 482013336003 | Block Group 3, Census Tract 3336, Harris County, Texas | 25.3% |
| 482013337001 | Block Group 1, Census Tract 3337, Harris County, Texas | 42.9% |
| 482013337002 | Block Group 2, Census Tract 3337, Harris County, Texas | 37.4% |
| 482013338001 | Block Group 1, Census Tract 3338, Harris County, Texas | 65.9% |
| 482013338002 | Block Group 2, Census Tract 3338, Harris County, Texas | 54.2% |
| 482013338003 | Block Group 3, Census Tract 3338, Harris County, Texas | 89.7% |
| 482013338004 | Block Group 4, Census Tract 3338, Harris County, Texas | 66.2% |
| 482013338005 | Block Group 5, Census Tract 3338, Harris County, Texas | 24.6% |
| 482013339011 | Block Group 1, Census Tract 3339.01, Harris County, Texas | 35.9% |
| 482013339012 | Block Group 2, Census Tract 3339.01, Harris County, Texas | 22.1% |
| 482013339021 | Block Group 1, Census Tract 3339.02, Harris County, Texas | 59.2% |
| 482013339022 | Block Group 2, Census Tract 3339.02, Harris County, Texas | 34.3% |
| 482013339023 | Block Group 3, Census Tract 3339.02, Harris County, Texas | 49.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013340011 | Block Group 1, Census Tract 3340.01, Harris County, Texas | 77.2% |
| 482013340012 | Block Group 2, Census Tract 3340.01, Harris County, Texas | 53.6% |
| 482013340021 | Block Group 1, Census Tract 3340.02, Harris County, Texas | 15.0% |
| 482013340022 | Block Group 2, Census Tract 3340.02, Harris County, Texas | 45.4% |
| 482013340031 | Block Group 1, Census Tract 3340.03, Harris County, Texas | 31.5% |
| 482013340032 | Block Group 2, Census Tract 3340.03, Harris County, Texas | 46.8% |
| 482013340033 | Block Group 3, Census Tract 3340.03, Harris County, Texas | 43.8% |
| 482013341001 | Block Group 1, Census Tract 3341, Harris County, Texas | 44.0% |
| 482013341002 | Block Group 2, Census Tract 3341, Harris County, Texas | 51.8% |
| 482013341003 | Block Group 3, Census Tract 3341, Harris County, Texas | 44.5% |
| 482013341004 | Block Group 4, Census Tract 3341, Harris County, Texas | 30.7% |
| 482013401001 | Block Group 1, Census Tract 3401, Harris County, Texas | 36.5% |
| 482013401002 | Block Group 2, Census Tract 3401, Harris County, Texas | 69.8% |
| 482013402011 | Block Group 1, Census Tract 3402.01, Harris County, Texas | 6.3% |
| 482013402012 | Block Group 2, Census Tract 3402.01, Harris County, Texas | 31.7% |
| 482013402021 | Block Group 1, Census Tract 3402.02, Harris County, Texas | 8.0% |
| 482013402022 | Block Group 2, Census Tract 3402.02, Harris County, Texas | 2.9% |
| 482013402031 | Block Group 1, Census Tract 3402.03, Harris County, Texas | 0.0% |
| 482013402032 | Block Group 2, Census Tract 3402.03, Harris County, Texas | 6.7% |
| 482013403011 | Block Group 1, Census Tract 3403.01, Harris County, Texas | 4.4% |
| 482013403012 | Block Group 2, Census Tract 3403.01, Harris County, Texas | 5.6% |
| 482013403021 | Block Group 1, Census Tract 3403.02, Harris County, Texas | 16.3% |
| 482013403022 | Block Group 2, Census Tract 3403.02, Harris County, Texas | 12.1% |
| 482013403023 | Block Group 3, Census Tract 3403.02, Harris County, Texas | 6.9% |
| 482013404001 | Block Group 1, Census Tract 3404, Harris County, Texas | 0.7% |
| 482013405001 | Block Group 1, Census Tract 3405, Harris County, Texas | 76.2% |
| 482013405002 | Block Group 2, Census Tract 3405, Harris County, Texas | 56.2% |
| 482013405003 | Block Group 3, Census Tract 3405, Harris County, Texas | 35.3% |
| 482013405004 | Block Group 4, Census Tract 3405, Harris County, Texas | 14.0% |
| 482013405005 | Block Group 5, Census Tract 3405, Harris County, Texas | 15.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013406001 | Block Group 1, Census Tract 3406, Harris County, Texas | 15.4% |
| 482013406002 | Block Group 2, Census Tract 3406, Harris County, Texas | 11.9% |
| 482013407001 | Block Group 1, Census Tract 3407, Harris County, Texas | 36.2% |
| 482013407002 | Block Group 2, Census Tract 3407, Harris County, Texas | 30.0% |
| 482013407003 | Block Group 3, Census Tract 3407, Harris County, Texas | 64.8% |
| 482013407004 | Block Group 4, Census Tract 3407, Harris County, Texas | 9.0% |
| 482013408001 | Block Group 1, Census Tract 3408, Harris County, Texas | 0.0% |
| 482013408002 | Block Group 2, Census Tract 3408, Harris County, Texas | 13.9% |
| 482013408003 | Block Group 3, Census Tract 3408, Harris County, Texas | 14.8% |
| 482013409001 | Block Group 1, Census Tract 3409, Harris County, Texas | 57.5% |
| 482013409002 | Block Group 2, Census Tract 3409, Harris County, Texas | 72.2% |
| 482013410001 | Block Group 1, Census Tract 3410, Harris County, Texas | 31.6% |
| 482013410002 | Block Group 2, Census Tract 3410, Harris County, Texas | 19.6% |
| 482013410003 | Block Group 3, Census Tract 3410, Harris County, Texas | 54.4% |
| 482013410004 | Block Group 4, Census Tract 3410, Harris County, Texas | 43.6% |
| 482013411001 | Block Group 1, Census Tract 3411, Harris County, Texas | 62.5% |
| 482013411002 | Block Group 2, Census Tract 3411, Harris County, Texas | 42.7% |
| 482013412011 | Block Group 1, Census Tract 3412.01, Harris County, Texas | 91.5% |
| 482013412012 | Block Group 2, Census Tract 3412.01, Harris County, Texas | 24.6% |
| 482013412021 | Block Group 1, Census Tract 3412.02, Harris County, Texas | 27.7% |
| 482013412022 | Block Group 2, Census Tract 3412.02, Harris County, Texas | 33.7% |
| 482013412023 | Block Group 3, Census Tract 3412.02, Harris County, Texas | 16.8% |
| 482013412024 | Block Group 4, Census Tract 3412.02, Harris County, Texas | 34.6% |
| 482013413011 | Block Group 1, Census Tract 3413.01, Harris County, Texas | 42.8% |
| 482013413012 | Block Group 2, Census Tract 3413.01, Harris County, Texas | 18.0% |
| 482013413013 | Block Group 3, Census Tract 3413.01, Harris County, Texas | 74.3% |
| 482013413021 | Block Group 1, Census Tract 3413.02, Harris County, Texas | 49.2% |
| 482013413022 | Block Group 2, Census Tract 3413.02, Harris County, Texas | 45.9% |
| 482013414001 | Block Group 1, Census Tract 3414, Harris County, Texas | 4.4% |
| 482013414002 | Block Group 2, Census Tract 3414, Harris County, Texas | 14.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013414003 | Block Group 3, Census Tract 3414, Harris County, Texas | 24.5% |
| 482013415011 | Block Group 1, Census Tract 3415.01, Harris County, Texas | 9.6% |
| 482013415012 | Block Group 2, Census Tract 3415.01, Harris County, Texas | 23.9% |
| 482013415013 | Block Group 3, Census Tract 3415.01, Harris County, Texas | 53.6% |
| 482013415021 | Block Group 1, Census Tract 3415.02, Harris County, Texas | 39.1% |
| 482013415022 | Block Group 2, Census Tract 3415.02, Harris County, Texas | 53.8% |
| 482013416001 | Block Group 1, Census Tract 3416, Harris County, Texas | 26.3% |
| 482013416002 | Block Group 2, Census Tract 3416, Harris County, Texas | 14.5% |
| 482013416003 | Block Group 3, Census Tract 3416, Harris County, Texas | 52.8% |
| 482013417001 | Block Group 1, Census Tract 3417, Harris County, Texas | 10.3% |
| 482013417002 | Block Group 2, Census Tract 3417, Harris County, Texas | 37.0% |
| 482013417003 | Block Group 3, Census Tract 3417, Harris County, Texas | 42.1% |
| 482013418001 | Block Group 1, Census Tract 3418, Harris County, Texas | 23.0% |
| 482013418002 | Block Group 2, Census Tract 3418, Harris County, Texas | 41.1% |
| 482013420011 | Block Group 1, Census Tract 3420.01, Harris County, Texas | 7.4% |
| 482013420012 | Block Group 2, Census Tract 3420.01, Harris County, Texas | 5.9% |
| 482013420013 | Block Group 3, Census Tract 3420.01, Harris County, Texas | 19.3% |
| 482013420021 | Block Group 1, Census Tract 3420.02, Harris County, Texas | 17.6% |
| 482013421001 | Block Group 1, Census Tract 3421, Harris County, Texas | 58.9% |
| 482013421002 | Block Group 2, Census Tract 3421, Harris County, Texas | 13.2% |
| 482013422001 | Block Group 1, Census Tract 3422, Harris County, Texas | 43.5% |
| 482013422002 | Block Group 2, Census Tract 3422, Harris County, Texas | 50.9% |
| 482013422003 | Block Group 3, Census Tract 3422, Harris County, Texas | 72.2% |
| 482013423001 | Block Group 1, Census Tract 3423, Harris County, Texas | 41.5% |
| 482013423002 | Block Group 2, Census Tract 3423, Harris County, Texas | 4.3% |
| 482013423003 | Block Group 3, Census Tract 3423, Harris County, Texas | 60.7% |
| 482013424001 | Block Group 1, Census Tract 3424, Harris County, Texas | 46.9% |
| 482013424002 | Block Group 2, Census Tract 3424, Harris County, Texas | 55.4% |
| 482013425001 | Block Group 1, Census Tract 3425, Harris County, Texas | 32.5% |
| 482013425002 | Block Group 2, Census Tract 3425, Harris County, Texas | 7.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013425003 | Block Group 3, Census Tract 3425, Harris County, Texas | 54.1% |
| 482013427001 | Block Group 1, Census Tract 3427, Harris County, Texas | 22.2% |
| 482013427002 | Block Group 2, Census Tract 3427, Harris County, Texas | 36.2% |
| 482013427003 | Block Group 3, Census Tract 3427, Harris County, Texas | 19.4% |
| 482013428001 | Block Group 1, Census Tract 3428, Harris County, Texas | 7.3% |
| 482013428002 | Block Group 2, Census Tract 3428, Harris County, Texas | 16.1% |
| 482013429001 | Block Group 1, Census Tract 3429, Harris County, Texas | 42.9% |
| 482013429002 | Block Group 2, Census Tract 3429, Harris County, Texas | 27.0% |
| 482013429003 | Block Group 3, Census Tract 3429, Harris County, Texas | 23.2% |
| 482013430001 | Block Group 1, Census Tract 3430, Harris County, Texas | 40.5% |
| 482013430002 | Block Group 2, Census Tract 3430, Harris County, Texas | 32.6% |
| 482013430003 | Block Group 3, Census Tract 3430, Harris County, Texas | 16.5% |
| 482013431001 | Block Group 1, Census Tract 3431, Harris County, Texas | 30.0% |
| 482013431002 | Block Group 2, Census Tract 3431, Harris County, Texas | 9.6% |
| 482013431003 | Block Group 3, Census Tract 3431, Harris County, Texas | 29.5% |
| 482013432001 | Block Group 1, Census Tract 3432, Harris County, Texas | 6.7% |
| 482013432002 | Block Group 2, Census Tract 3432, Harris County, Texas | 19.6% |
| 482013433011 | Block Group 1, Census Tract 3433.01, Harris County, Texas | 36.1% |
| 482013433012 | Block Group 2, Census Tract 3433.01, Harris County, Texas | 38.3% |
| 482013433013 | Block Group 3, Census Tract 3433.01, Harris County, Texas | 36.6% |
| 482013433021 | Block Group 1, Census Tract 3433.02, Harris County, Texas | 22.5% |
| 482013433022 | Block Group 2, Census Tract 3433.02, Harris County, Texas | 37.7% |
| 482013436001 | Block Group 1, Census Tract 3436, Harris County, Texas | 22.3% |
| 482013436002 | Block Group 2, Census Tract 3436, Harris County, Texas | 54.4% |
| 482013436003 | Block Group 3, Census Tract 3436, Harris County, Texas | 44.0% |
| 482013437001 | Block Group 1, Census Tract 3437, Harris County, Texas | 66.3% |
| 482013437002 | Block Group 2, Census Tract 3437, Harris County, Texas | 39.0% |
| 482013437003 | Block Group 3, Census Tract 3437, Harris County, Texas | 43.8% |
| 482013501001 | Block Group 1, Census Tract 3501, Harris County, Texas | 18.2% |
| 482013501002 | Block Group 2, Census Tract 3501, Harris County, Texas | 37.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482013502001 | Block Group 1, Census Tract 3502, Harris County, Texas | 63.1% |
| 482013502002 | Block Group 2, Census Tract 3502, Harris County, Texas | 21.1% |
| 482013502003 | Block Group 3, Census Tract 3502, Harris County, Texas | 23.1% |
| 482013502004 | Block Group 4, Census Tract 3502, Harris County, Texas | 24.0% |
| 482013503001 | Block Group 1, Census Tract 3503, Harris County, Texas | 34.8% |
| 482013503002 | Block Group 2, Census Tract 3503, Harris County, Texas | 13.2% |
| 482013503003 | Block Group 3, Census Tract 3503, Harris County, Texas | 22.8% |
| 482013503004 | Block Group 4, Census Tract 3503, Harris County, Texas | 16.3% |
| 482013504001 | Block Group 1, Census Tract 3504, Harris County, Texas | 29.1% |
| 482013504002 | Block Group 2, Census Tract 3504, Harris County, Texas | 21.2% |
| 482013504003 | Block Group 3, Census Tract 3504, Harris County, Texas | 62.8% |
| 482013505001 | Block Group 1, Census Tract 3505, Harris County, Texas | 50.6% |
| 482013505002 | Block Group 2, Census Tract 3505, Harris County, Texas | 77.5% |
| 482013505003 | Block Group 3, Census Tract 3505, Harris County, Texas | 51.2% |
| 482013505004 | Block Group 4, Census Tract 3505, Harris County, Texas | 36.1% |
| 482013506011 | Block Group 1, Census Tract 3506.01, Harris County, Texas | 9.5% |
| 482013506012 | Block Group 2, Census Tract 3506.01, Harris County, Texas | 5.4% |
| 482013506021 | Block Group 1, Census Tract 3506.02, Harris County, Texas | 19.9% |
| 482013506022 | Block Group 2, Census Tract 3506.02, Harris County, Texas | 26.2% |
| 482013506023 | Block Group 3, Census Tract 3506.02, Harris County, Texas | 18.5% |
| 482013507001 | Block Group 1, Census Tract 3507, Harris County, Texas | 15.6% |
| 482013507002 | Block Group 2, Census Tract 3507, Harris County, Texas | 22.8% |
| 482013508011 | Block Group 1, Census Tract 3508.01, Harris County, Texas | 45.4% |
| 482013508012 | Block Group 2, Census Tract 3508.01, Harris County, Texas | 37.4% |
| 482013508013 | Block Group 3, Census Tract 3508.01, Harris County, Texas | 15.9% |
| 482013508021 | Block Group 1, Census Tract 3508.02, Harris County, Texas | 7.7% |
| 482013508022 | Block Group 2, Census Tract 3508.02, Harris County, Texas | 46.3% |
| 482014101001 | Block Group 1, Census Tract 4101, Harris County, Texas | 53.5% |
| 482014101002 | Block Group 2, Census Tract 4101, Harris County, Texas | 39.3% |
| 482014102001 | Block Group 1, Census Tract 4102, Harris County, Texas | 35.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014102002 | Block Group 2, Census Tract 4102, Harris County, Texas | 26.3% |
| 482014102003 | Block Group 3, Census Tract 4102, Harris County, Texas | 31.8% |
| 482014103001 | Block Group 1, Census Tract 4103, Harris County, Texas | 33.3% |
| 482014103002 | Block Group 2, Census Tract 4103, Harris County, Texas | 14.7% |
| 482014103003 | Block Group 3, Census Tract 4103, Harris County, Texas | 35.0% |
| 482014104011 | Block Group 1, Census Tract 4104.01, Harris County, Texas | 23.0% |
| 482014104012 | Block Group 2, Census Tract 4104.01, Harris County, Texas | 32.9% |
| 482014104013 | Block Group 3, Census Tract 4104.01, Harris County, Texas | 20.0% |
| 482014104021 | Block Group 1, Census Tract 4104.02, Harris County, Texas | 52.0% |
| 482014104022 | Block Group 2, Census Tract 4104.02, Harris County, Texas | 36.2% |
| 482014105001 | Block Group 1, Census Tract 4105, Harris County, Texas | 37.5% |
| 482014105002 | Block Group 2, Census Tract 4105, Harris County, Texas | 32.8% |
| 482014105003 | Block Group 3, Census Tract 4105, Harris County, Texas | 37.3% |
| 482014105004 | Block Group 4, Census Tract 4105, Harris County, Texas | 16.0% |
| 482014106001 | Block Group 1, Census Tract 4106, Harris County, Texas | 17.5% |
| 482014106002 | Block Group 2, Census Tract 4106, Harris County, Texas | 20.2% |
| 482014107011 | Block Group 1, Census Tract 4107.01, Harris County, Texas | 26.0% |
| 482014107012 | Block Group 2, Census Tract 4107.01, Harris County, Texas | 38.6% |
| 482014107013 | Block Group 3, Census Tract 4107.01, Harris County, Texas | 48.2% |
| 482014107014 | Block Group 4, Census Tract 4107.01, Harris County, Texas | 53.0% |
| 482014107021 | Block Group 1, Census Tract 4107.02, Harris County, Texas | 34.9% |
| 482014107022 | Block Group 2, Census Tract 4107.02, Harris County, Texas | 65.7% |
| 482014108001 | Block Group 1, Census Tract 4108, Harris County, Texas | 39.4% |
| 482014108002 | Block Group 2, Census Tract 4108, Harris County, Texas | 63.1% |
| 482014108003 | Block Group 3, Census Tract 4108, Harris County, Texas | 59.8% |
| 482014109001 | Block Group 1, Census Tract 4109, Harris County, Texas | 44.5% |
| 482014109002 | Block Group 2, Census Tract 4109, Harris County, Texas | 48.6% |
| 482014109003 | Block Group 3, Census Tract 4109, Harris County, Texas | 15.1% |
| 482014110001 | Block Group 1, Census Tract 4110, Harris County, Texas | 26.0% |
| 482014110002 | Block Group 2, Census Tract 4110, Harris County, Texas | 29.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014110003 | Block Group 3, Census Tract 4110, Harris County, Texas | 13.2% |
| 482014111001 | Block Group 1, Census Tract 4111, Harris County, Texas | 10.1% |
| 482014111002 | Block Group 2, Census Tract 4111, Harris County, Texas | 15.1% |
| 482014111003 | Block Group 3, Census Tract 4111, Harris County, Texas | 25.6% |
| 482014112001 | Block Group 1, Census Tract 4112, Harris County, Texas | 2.9% |
| 482014112002 | Block Group 2, Census Tract 4112, Harris County, Texas | 3.8% |
| 482014113001 | Block Group 1, Census Tract 4113, Harris County, Texas | 6.1% |
| 482014113002 | Block Group 2, Census Tract 4113, Harris County, Texas | 28.8% |
| 482014113003 | Block Group 3, Census Tract 4113, Harris County, Texas | 39.3% |
| 482014114001 | Block Group 1, Census Tract 4114, Harris County, Texas | 20.0% |
| 482014114002 | Block Group 2, Census Tract 4114, Harris County, Texas | 8.1% |
| 482014114003 | Block Group 3, Census Tract 4114, Harris County, Texas | 1.6% |
| 482014115011 | Block Group 1, Census Tract 4115.01, Harris County, Texas | 31.0% |
| 482014115012 | Block Group 2, Census Tract 4115.01, Harris County, Texas | 14.1% |
| 482014115013 | Block Group 3, Census Tract 4115.01, Harris County, Texas | 26.4% |
| 482014115021 | Block Group 1, Census Tract 4115.02, Harris County, Texas | 11.5% |
| 482014115022 | Block Group 2, Census Tract 4115.02, Harris County, Texas | 9.5% |
| 482014115023 | Block Group 3, Census Tract 4115.02, Harris County, Texas | 31.1% |
| 482014115024 | Block Group 4, Census Tract 4115.02, Harris County, Texas | 22.9% |
| 482014116001 | Block Group 1, Census Tract 4116, Harris County, Texas | 7.1% |
| 482014116002 | Block Group 2, Census Tract 4116, Harris County, Texas | 20.7% |
| 482014117001 | Block Group 1, Census Tract 4117, Harris County, Texas | 64.5% |
| 482014117002 | Block Group 2, Census Tract 4117, Harris County, Texas | 20.4% |
| 482014118001 | Block Group 1, Census Tract 4118, Harris County, Texas | 58.6% |
| 482014118002 | Block Group 2, Census Tract 4118, Harris County, Texas | 15.4% |
| 482014118003 | Block Group 3, Census Tract 4118, Harris County, Texas | 23.6% |
| 482014118004 | Block Group 4, Census Tract 4118, Harris County, Texas | 11.1% |
| 482014119001 | Block Group 1, Census Tract 4119, Harris County, Texas | 31.9% |
| 482014119002 | Block Group 2, Census Tract 4119, Harris County, Texas | 17.9% |
| 482014119003 | Block Group 3, Census Tract 4119, Harris County, Texas | 31.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014120001 | Block Group 1, Census Tract 4120, Harris County, Texas | 22.5% |
| 482014120002 | Block Group 2, Census Tract 4120, Harris County, Texas | 9.3% |
| 482014120003 | Block Group 3, Census Tract 4120, Harris County, Texas | 6.5% |
| 482014121001 | Block Group 1, Census Tract 4121, Harris County, Texas | 100.0% |
| 482014122001 | Block Group 1, Census Tract 4122, Harris County, Texas | 8.0% |
| 482014122002 | Block Group 2, Census Tract 4122, Harris County, Texas | 7.8% |
| 482014122003 | Block Group 3, Census Tract 4122, Harris County, Texas | 23.6% |
| 482014122004 | Block Group 4, Census Tract 4122, Harris County, Texas | 11.4% |
| 482014123001 | Block Group 1, Census Tract 4123, Harris County, Texas | 4.9% |
| 482014123002 | Block Group 2, Census Tract 4123, Harris County, Texas | 7.2% |
| 482014123003 | Block Group 3, Census Tract 4123, Harris County, Texas | 10.3% |
| 482014123004 | Block Group 4, Census Tract 4123, Harris County, Texas | 7.7% |
| 482014123005 | Block Group 5, Census Tract 4123, Harris County, Texas | 13.0% |
| 482014124001 | Block Group 1, Census Tract 4124, Harris County, Texas | 0.0% |
| 482014124002 | Block Group 2, Census Tract 4124, Harris County, Texas | 9.4% |
| 482014124003 | Block Group 3, Census Tract 4124, Harris County, Texas | 3.8% |
| 482014124004 | Block Group 4, Census Tract 4124, Harris County, Texas | 8.4% |
| 482014125001 | Block Group 1, Census Tract 4125, Harris County, Texas | 8.2% |
| 482014125002 | Block Group 2, Census Tract 4125, Harris County, Texas | 30.4% |
| 482014126001 | Block Group 1, Census Tract 4126, Harris County, Texas | 6.5% |
| 482014126002 | Block Group 2, Census Tract 4126, Harris County, Texas | 23.1% |
| 482014126003 | Block Group 3, Census Tract 4126, Harris County, Texas | 3.4% |
| 482014127001 | Block Group 1, Census Tract 4127, Harris County, Texas | 14.8% |
| 482014127002 | Block Group 2, Census Tract 4127, Harris County, Texas | 14.2% |
| 482014128001 | Block Group 1, Census Tract 4128, Harris County, Texas | 5.2% |
| 482014128002 | Block Group 2, Census Tract 4128, Harris County, Texas | 15.8% |
| 482014128003 | Block Group 3, Census Tract 4128, Harris County, Texas | 7.6% |
| 482014129001 | Block Group 1, Census Tract 4129, Harris County, Texas | 37.7% |
| 482014129002 | Block Group 2, Census Tract 4129, Harris County, Texas | 48.6% |
| 482014129003 | Block Group 3, Census Tract 4129, Harris County, Texas | 18.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014130001 | Block Group 1, Census Tract 4130, Harris County, Texas | 15.1% |
| 482014130002 | Block Group 2, Census Tract 4130, Harris County, Texas | 27.7% |
| 482014131001 | Block Group 1, Census Tract 4131, Harris County, Texas | 15.7% |
| 482014131002 | Block Group 2, Census Tract 4131, Harris County, Texas | 24.7% |
| 482014131003 | Block Group 3, Census Tract 4131, Harris County, Texas | 7.8% |
| 482014132011 | Block Group 1, Census Tract 4132.01, Harris County, Texas | 38.4% |
| 482014132012 | Block Group 2, Census Tract 4132.01, Harris County, Texas | 15.0% |
| 482014132021 | Block Group 1, Census Tract 4132.02, Harris County, Texas | 30.6% |
| 482014132022 | Block Group 2, Census Tract 4132.02, Harris County, Texas | 18.7% |
| 482014133001 | Block Group 1, Census Tract 4133, Harris County, Texas | 75.0% |
| 482014133002 | Block Group 2, Census Tract 4133, Harris County, Texas | 20.9% |
| 482014133003 | Block Group 3, Census Tract 4133, Harris County, Texas | 16.4% |
| 482014133004 | Block Group 4, Census Tract 4133, Harris County, Texas | 41.6% |
| 482014133005 | Block Group 5, Census Tract 4133, Harris County, Texas | 6.1% |
| 482014201001 | Block Group 1, Census Tract 4201, Harris County, Texas | 62.9% |
| 482014201002 | Block Group 2, Census Tract 4201, Harris County, Texas | 75.5% |
| 482014202001 | Block Group 1, Census Tract 4202, Harris County, Texas | 44.2% |
| 482014202002 | Block Group 2, Census Tract 4202, Harris County, Texas | 39.7% |
| 482014203001 | Block Group 1, Census Tract 4203, Harris County, Texas | 21.8% |
| 482014203002 | Block Group 2, Census Tract 4203, Harris County, Texas | 19.9% |
| 482014203003 | Block Group 3, Census Tract 4203, Harris County, Texas | 14.2% |
| 482014204001 | Block Group 1, Census Tract 4204, Harris County, Texas | 22.7% |
| 482014204002 | Block Group 2, Census Tract 4204, Harris County, Texas | 20.1% |
| 482014204003 | Block Group 3, Census Tract 4204, Harris County, Texas | 52.9% |
| 482014205001 | Block Group 1, Census Tract 4205, Harris County, Texas | 58.5% |
| 482014205002 | Block Group 2, Census Tract 4205, Harris County, Texas | 82.5% |
| 482014205003 | Block Group 3, Census Tract 4205, Harris County, Texas | 89.3% |
| 482014206001 | Block Group 1, Census Tract 4206, Harris County, Texas | 45.2% |
| 482014206002 | Block Group 2, Census Tract 4206, Harris County, Texas | 19.8% |
| 482014207001 | Block Group 1, Census Tract 4207, Harris County, Texas | 4.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014207002 | Block Group 2, Census Tract 4207, Harris County, Texas | 2.2% |
| 482014207003 | Block Group 3, Census Tract 4207, Harris County, Texas | 8.7% |
| 482014208001 | Block Group 1, Census Tract 4208, Harris County, Texas | 12.7% |
| 482014208002 | Block Group 2, Census Tract 4208, Harris County, Texas | 11.3% |
| 482014208003 | Block Group 3, Census Tract 4208, Harris County, Texas | 17.4% |
| 482014209001 | Block Group 1, Census Tract 4209, Harris County, Texas | 15.4% |
| 482014209002 | Block Group 2, Census Tract 4209, Harris County, Texas | 1.1% |
| 482014209003 | Block Group 3, Census Tract 4209, Harris County, Texas | 9.1% |
| 482014209004 | Block Group 4, Census Tract 4209, Harris County, Texas | 9.0% |
| 482014210001 | Block Group 1, Census Tract 4210, Harris County, Texas | 5.6% |
| 482014210002 | Block Group 2, Census Tract 4210, Harris County, Texas | 10.3% |
| 482014211011 | Block Group 1, Census Tract 4211.01, Harris County, Texas | 27.3% |
| 482014211012 | Block Group 2, Census Tract 4211.01, Harris County, Texas | 81.8% |
| 482014211021 | Block Group 1, Census Tract 4211.02, Harris County, Texas | 87.1% |
| 482014211022 | Block Group 2, Census Tract 4211.02, Harris County, Texas | 46.3% |
| 482014211023 | Block Group 3, Census Tract 4211.02, Harris County, Texas | 77.2% |
| 482014212011 | Block Group 1, Census Tract 4212.01, Harris County, Texas | 71.7% |
| 482014212012 | Block Group 2, Census Tract 4212.01, Harris County, Texas | 63.2% |
| 482014212013 | Block Group 3, Census Tract 4212.01, Harris County, Texas | 100.0% |
| 482014212021 | Block Group 1, Census Tract 4212.02, Harris County, Texas | 94.9% |
| 482014212022 | Block Group 2, Census Tract 4212.02, Harris County, Texas | 100.0% |
| 482014212023 | Block Group 3, Census Tract 4212.02, Harris County, Texas | 50.0% |
| 482014213001 | Block Group 1, Census Tract 4213, Harris County, Texas | 76.3% |
| 482014213002 | Block Group 2, Census Tract 4213, Harris County, Texas | 80.0% |
| 482014213003 | Block Group 3, Census Tract 4213, Harris County, Texas | 87.9% |
| 482014214011 | Block Group 1, Census Tract 4214.01, Harris County, Texas | 94.2% |
| 482014214012 | Block Group 2, Census Tract 4214.01, Harris County, Texas | 81.5% |
| 482014214021 | Block Group 1, Census Tract 4214.02, Harris County, Texas | 95.1% |
| 482014214022 | Block Group 2, Census Tract 4214.02, Harris County, Texas | 87.6% |
| 482014214031 | Block Group 1, Census Tract 4214.03, Harris County, Texas | 54.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014214032 | Block Group 2, Census Tract 4214.03, Harris County, Texas | 88.6% |
| 482014214033 | Block Group 3, Census Tract 4214.03, Harris County, Texas | 69.8% |
| 482014215001 | Block Group 1, Census Tract 4215, Harris County, Texas | 91.2% |
| 482014215002 | Block Group 2, Census Tract 4215, Harris County, Texas | 74.3% |
| 482014215003 | Block Group 3, Census Tract 4215, Harris County, Texas | 57.3% |
| 482014215004 | Block Group 4, Census Tract 4215, Harris County, Texas | 71.8% |
| 482014216001 | Block Group 1, Census Tract 4216, Harris County, Texas | 78.8% |
| 482014216002 | Block Group 2, Census Tract 4216, Harris County, Texas | 74.9% |
| 482014216003 | Block Group 3, Census Tract 4216, Harris County, Texas | 55.8% |
| 482014216004 | Block Group 4, Census Tract 4216, Harris County, Texas | 100.0% |
| 482014217001 | Block Group 1, Census Tract 4217, Harris County, Texas | 67.5% |
| 482014217002 | Block Group 2, Census Tract 4217, Harris County, Texas | 55.0% |
| 482014217003 | Block Group 3, Census Tract 4217, Harris County, Texas | 10.7% |
| 482014217004 | Block Group 4, Census Tract 4217, Harris County, Texas | 24.2% |
| 482014218001 | Block Group 1, Census Tract 4218, Harris County, Texas | 52.1% |
| 482014218002 | Block Group 2, Census Tract 4218, Harris County, Texas | 71.9% |
| 482014218003 | Block Group 3, Census Tract 4218, Harris County, Texas | 53.3% |
| 482014218004 | Block Group 4, Census Tract 4218, Harris County, Texas | 18.1% |
| 482014219001 | Block Group 1, Census Tract 4219, Harris County, Texas | 15.3% |
| 482014219002 | Block Group 2, Census Tract 4219, Harris County, Texas | 11.3% |
| 482014219003 | Block Group 3, Census Tract 4219, Harris County, Texas | 1.7% |
| 482014220001 | Block Group 1, Census Tract 4220, Harris County, Texas | 2.9% |
| 482014220002 | Block Group 2, Census Tract 4220, Harris County, Texas | 8.4% |
| 482014220003 | Block Group 3, Census Tract 4220, Harris County, Texas | 23.2% |
| 482014221001 | Block Group 1, Census Tract 4221, Harris County, Texas | 55.6% |
| 482014221002 | Block Group 2, Census Tract 4221, Harris County, Texas | 13.5% |
| 482014221003 | Block Group 3, Census Tract 4221, Harris County, Texas | 37.2% |
| 482014221004 | Block Group 4, Census Tract 4221, Harris County, Texas | 38.3% |
| 482014221005 | Block Group 5, Census Tract 4221, Harris County, Texas | 19.7% |
| 482014222001 | Block Group 1, Census Tract 4222, Harris County, Texas | 85.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014222002 | Block Group 2, Census Tract 4222, Harris County, Texas | 81.0% |
| 482014222003 | Block Group 3, Census Tract 4222, Harris County, Texas | 74.5% |
| 482014223011 | Block Group 1, Census Tract 4223.01, Harris County, Texas | 79.5% |
| 482014223012 | Block Group 2, Census Tract 4223.01, Harris County, Texas | 48.1% |
| 482014223013 | Block Group 3, Census Tract 4223.01, Harris County, Texas | 44.9% |
| 482014223014 | Block Group 4, Census Tract 4223.01, Harris County, Texas | 89.2% |
| 482014223021 | Block Group 1, Census Tract 4223.02, Harris County, Texas | 32.5% |
| 482014224011 | Block Group 1, Census Tract 4224.01, Harris County, Texas | 64.3% |
| 482014224012 | Block Group 2, Census Tract 4224.01, Harris County, Texas | 85.2% |
| 482014224013 | Block Group 3, Census Tract 4224.01, Harris County, Texas | 92.6% |
| 482014224021 | Block Group 1, Census Tract 4224.02, Harris County, Texas | 69.5% |
| 482014224022 | Block Group 2, Census Tract 4224.02, Harris County, Texas | 63.9% |
| 482014224023 | Block Group 3, Census Tract 4224.02, Harris County, Texas | 75.1% |
| 482014224024 | Block Group 4, Census Tract 4224.02, Harris County, Texas | 5.7% |
| 482014225001 | Block Group 1, Census Tract 4225, Harris County, Texas | 82.7% |
| 482014225002 | Block Group 2, Census Tract 4225, Harris County, Texas | 6.1% |
| 482014225003 | Block Group 3, Census Tract 4225, Harris County, Texas | 77.5% |
| 482014225004 | Block Group 4, Census Tract 4225, Harris County, Texas | 29.7% |
| 482014226001 | Block Group 1, Census Tract 4226, Harris County, Texas | 67.2% |
| 482014226002 | Block Group 2, Census Tract 4226, Harris County, Texas | 29.1% |
| 482014226003 | Block Group 3, Census Tract 4226, Harris County, Texas | 53.0% |
| 482014226004 | Block Group 4, Census Tract 4226, Harris County, Texas | 87.0% |
| 482014227011 | Block Group 1, Census Tract 4227.01, Harris County, Texas | 92.1% |
| 482014227012 | Block Group 2, Census Tract 4227.01, Harris County, Texas | 57.7% |
| 482014227013 | Block Group 3, Census Tract 4227.01, Harris County, Texas | 42.6% |
| 482014227021 | Block Group 1, Census Tract 4227.02, Harris County, Texas | 67.1% |
| 482014227022 | Block Group 2, Census Tract 4227.02, Harris County, Texas | 37.7% |
| 482014228001 | Block Group 1, Census Tract 4228, Harris County, Texas | 27.8% |
| 482014228002 | Block Group 2, Census Tract 4228, Harris County, Texas | 73.3% |
| 482014228003 | Block Group 3, Census Tract 4228, Harris County, Texas | 33.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014228004 | Block Group 4, Census Tract 4228, Harris County, Texas | 93.1% |
| 482014229001 | Block Group 1, Census Tract 4229, Harris County, Texas | 82.3% |
| 482014229002 | Block Group 2, Census Tract 4229, Harris County, Texas | 53.9% |
| 482014230001 | Block Group 1, Census Tract 4230, Harris County, Texas | 78.0% |
| 482014230002 | Block Group 2, Census Tract 4230, Harris County, Texas | 60.4% |
| 482014230003 | Block Group 3, Census Tract 4230, Harris County, Texas | 66.4% |
| 482014231001 | Block Group 1, Census Tract 4231, Harris County, Texas | 86.7% |
| 482014231002 | Block Group 2, Census Tract 4231, Harris County, Texas | 82.6% |
| 482014232011 | Block Group 1, Census Tract 4232.01, Harris County, Texas | 6.3% |
| 482014232012 | Block Group 2, Census Tract 4232.01, Harris County, Texas | 62.5% |
| 482014232021 | Block Group 1, Census Tract 4232.02, Harris County, Texas | 87.5% |
| 482014232022 | Block Group 2, Census Tract 4232.02, Harris County, Texas | 46.9% |
| 482014232023 | Block Group 3, Census Tract 4232.02, Harris County, Texas | 72.9% |
| 482014233011 | Block Group 1, Census Tract 4233.01, Harris County, Texas | 33.5% |
| 482014233012 | Block Group 2, Census Tract 4233.01, Harris County, Texas | 33.8% |
| 482014233013 | Block Group 3, Census Tract 4233.01, Harris County, Texas | 86.1% |
| 482014233021 | Block Group 1, Census Tract 4233.02, Harris County, Texas | 36.9% |
| 482014233022 | Block Group 2, Census Tract 4233.02, Harris County, Texas | 65.2% |
| 482014233023 | Block Group 3, Census Tract 4233.02, Harris County, Texas | 61.5% |
| 482014234011 | Block Group 1, Census Tract 4234.01, Harris County, Texas | 31.8% |
| 482014234012 | Block Group 2, Census Tract 4234.01, Harris County, Texas | 64.1% |
| 482014234013 | Block Group 3, Census Tract 4234.01, Harris County, Texas | 19.1% |
| 482014234021 | Block Group 1, Census Tract 4234.02, Harris County, Texas | 28.2% |
| 482014234022 | Block Group 2, Census Tract 4234.02, Harris County, Texas | 33.0% |
| 482014235001 | Block Group 1, Census Tract 4235, Harris County, Texas | 26.5% |
| 482014236001 | Block Group 1, Census Tract 4236, Harris County, Texas | 56.9% |
| 482014236002 | Block Group 2, Census Tract 4236, Harris County, Texas | 55.5% |
| 482014236003 | Block Group 3, Census Tract 4236, Harris County, Texas | 37.7% |
| 482014236004 | Block Group 4, Census Tract 4236, Harris County, Texas | 44.0% |
| 482014301001 | Block Group 1, Census Tract 4301, Harris County, Texas | 34.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014301002 | Block Group 2, Census Tract 4301, Harris County, Texas | 15.7% |
| 482014301003 | Block Group 3, Census Tract 4301, Harris County, Texas | 44.7% |
| 482014301004 | Block Group 4, Census Tract 4301, Harris County, Texas | 25.6% |
| 482014301005 | Block Group 5, Census Tract 4301, Harris County, Texas | 41.1% |
| 482014302001 | Block Group 1, Census Tract 4302, Harris County, Texas | 15.3% |
| 482014303001 | Block Group 1, Census Tract 4303, Harris County, Texas | 3.1% |
| 482014303002 | Block Group 2, Census Tract 4303, Harris County, Texas | 1.1% |
| 482014303003 | Block Group 3, Census Tract 4303, Harris County, Texas | 1.9% |
| 482014304001 | Block Group 1, Census Tract 4304, Harris County, Texas | 4.6% |
| 482014304002 | Block Group 2, Census Tract 4304, Harris County, Texas | 6.4% |
| 482014305001 | Block Group 1, Census Tract 4305, Harris County, Texas | 17.2% |
| 482014305002 | Block Group 2, Census Tract 4305, Harris County, Texas | 19.0% |
| 482014306001 | Block Group 1, Census Tract 4306, Harris County, Texas | 10.5% |
| 482014306002 | Block Group 2, Census Tract 4306, Harris County, Texas | 9.0% |
| 482014307001 | Block Group 1, Census Tract 4307, Harris County, Texas | 34.0% |
| 482014307002 | Block Group 2, Census Tract 4307, Harris County, Texas | 47.6% |
| 482014307003 | Block Group 3, Census Tract 4307, Harris County, Texas | 4.1% |
| 482014308001 | Block Group 1, Census Tract 4308, Harris County, Texas | 7.2% |
| 482014308002 | Block Group 2, Census Tract 4308, Harris County, Texas | 11.0% |
| 482014309001 | Block Group 1, Census Tract 4309, Harris County, Texas | 11.1% |
| 482014309002 | Block Group 2, Census Tract 4309, Harris County, Texas | 7.2% |
| 482014309003 | Block Group 3, Census Tract 4309, Harris County, Texas | 15.7% |
| 482014309004 | Block Group 4, Census Tract 4309, Harris County, Texas | 29.2% |
| 482014310001 | Block Group 1, Census Tract 4310, Harris County, Texas | 19.5% |
| 482014310002 | Block Group 2, Census Tract 4310, Harris County, Texas | 3.6% |
| 482014310003 | Block Group 3, Census Tract 4310, Harris County, Texas | 22.6% |
| 482014310004 | Block Group 4, Census Tract 4310, Harris County, Texas | 3.7% |
| 482014311011 | Block Group 1, Census Tract 4311.01, Harris County, Texas | 8.0% |
| 482014311012 | Block Group 2, Census Tract 4311.01, Harris County, Texas | 55.3% |
| 482014311013 | Block Group 3, Census Tract 4311.01, Harris County, Texas | 12.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014311021 | Block Group 1, Census Tract 4311.02, Harris County, Texas | 33.2% |
| 482014311022 | Block Group 2, Census Tract 4311.02, Harris County, Texas | 20.6% |
| 482014312011 | Block Group 1, Census Tract 4312.01, Harris County, Texas | 17.8% |
| 482014312012 | Block Group 2, Census Tract 4312.01, Harris County, Texas | 58.6% |
| 482014312021 | Block Group 1, Census Tract 4312.02, Harris County, Texas | 39.0% |
| 482014312022 | Block Group 2, Census Tract 4312.02, Harris County, Texas | 3.5% |
| 482014312023 | Block Group 3, Census Tract 4312.02, Harris County, Texas | 19.9% |
| 482014312024 | Block Group 4, Census Tract 4312.02, Harris County, Texas | 30.4% |
| 482014313011 | Block Group 1, Census Tract 4313.01, Harris County, Texas | 47.7% |
| 482014313012 | Block Group 2, Census Tract 4313.01, Harris County, Texas | 61.7% |
| 482014313013 | Block Group 3, Census Tract 4313.01, Harris County, Texas | 52.9% |
| 482014313021 | Block Group 1, Census Tract 4313.02, Harris County, Texas | 27.8% |
| 482014313022 | Block Group 2, Census Tract 4313.02, Harris County, Texas | 7.1% |
| 482014313023 | Block Group 3, Census Tract 4313.02, Harris County, Texas | 10.0% |
| 482014314011 | Block Group 1, Census Tract 4314.01, Harris County, Texas | 32.0% |
| 482014314012 | Block Group 2, Census Tract 4314.01, Harris County, Texas | 30.7% |
| 482014314021 | Block Group 1, Census Tract 4314.02, Harris County, Texas | 32.5% |
| 482014314022 | Block Group 2, Census Tract 4314.02, Harris County, Texas | 11.4% |
| 482014315011 | Block Group 1, Census Tract 4315.01, Harris County, Texas | 19.8% |
| 482014315012 | Block Group 2, Census Tract 4315.01, Harris County, Texas | 21.6% |
| 482014315013 | Block Group 3, Census Tract 4315.01, Harris County, Texas | 17.4% |
| 482014315021 | Block Group 1, Census Tract 4315.02, Harris County, Texas | 19.2% |
| 482014315022 | Block Group 2, Census Tract 4315.02, Harris County, Texas | 7.2% |
| 482014315023 | Block Group 3, Census Tract 4315.02, Harris County, Texas | 6.8% |
| 482014316001 | Block Group 1, Census Tract 4316, Harris County, Texas | 6.1% |
| 482014316002 | Block Group 2, Census Tract 4316, Harris County, Texas | 4.2% |
| 482014316003 | Block Group 3, Census Tract 4316, Harris County, Texas | 12.4% |
| 482014317001 | Block Group 1, Census Tract 4317, Harris County, Texas | 10.4% |
| 482014317002 | Block Group 2, Census Tract 4317, Harris County, Texas | 13.0% |
| 482014317003 | Block Group 3, Census Tract 4317, Harris County, Texas | 6.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014318011 | Block Group 1, Census Tract 4318.01, Harris County, Texas | 17.6% |
| 482014318012 | Block Group 2, Census Tract 4318.01, Harris County, Texas | 21.5% |
| 482014318013 | Block Group 3, Census Tract 4318.01, Harris County, Texas | 12.2% |
| 482014318021 | Block Group 1, Census Tract 4318.02, Harris County, Texas | 21.1% |
| 482014318022 | Block Group 2, Census Tract 4318.02, Harris County, Texas | 21.8% |
| 482014319001 | Block Group 1, Census Tract 4319, Harris County, Texas | 19.1% |
| 482014319002 | Block Group 2, Census Tract 4319, Harris County, Texas | 12.3% |
| 482014320011 | Block Group 1, Census Tract 4320.01, Harris County, Texas | 50.4% |
| 482014320012 | Block Group 2, Census Tract 4320.01, Harris County, Texas | 13.9% |
| 482014320021 | Block Group 1, Census Tract 4320.02, Harris County, Texas | 94.0% |
| 482014320022 | Block Group 2, Census Tract 4320.02, Harris County, Texas | 73.7% |
| 482014320023 | Block Group 3, Census Tract 4320.02, Harris County, Texas | 68.6% |
| 482014321001 | Block Group 1, Census Tract 4321, Harris County, Texas | 57.3% |
| 482014321002 | Block Group 2, Census Tract 4321, Harris County, Texas | 57.4% |
| 482014321003 | Block Group 3, Census Tract 4321, Harris County, Texas | 9.9% |
| 482014322001 | Block Group 1, Census Tract 4322, Harris County, Texas | 28.0% |
| 482014322002 | Block Group 2, Census Tract 4322, Harris County, Texas | 27.9% |
| 482014322003 | Block Group 3, Census Tract 4322, Harris County, Texas | 71.0% |
| 482014323001 | Block Group 1, Census Tract 4323, Harris County, Texas | 48.9% |
| 482014323002 | Block Group 2, Census Tract 4323, Harris County, Texas | 88.0% |
| 482014323003 | Block Group 3, Census Tract 4323, Harris County, Texas | 63.1% |
| 482014323004 | Block Group 4, Census Tract 4323, Harris County, Texas | 35.9% |
| 482014324001 | Block Group 1, Census Tract 4324, Harris County, Texas | 44.9% |
| 482014324002 | Block Group 2, Census Tract 4324, Harris County, Texas | 57.1% |
| 482014324003 | Block Group 3, Census Tract 4324, Harris County, Texas | 68.1% |
| 482014325001 | Block Group 1, Census Tract 4325, Harris County, Texas | 70.2% |
| 482014325002 | Block Group 2, Census Tract 4325, Harris County, Texas | 48.2% |
| 482014325003 | Block Group 3, Census Tract 4325, Harris County, Texas | 57.2% |
| 482014326001 | Block Group 1, Census Tract 4326, Harris County, Texas | 4.4% |
| 482014326002 | Block Group 2, Census Tract 4326, Harris County, Texas | 34.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014327011 | Block Group 1, Census Tract 4327.01, Harris County, Texas | 93.2% |
| 482014327012 | Block Group 2, Census Tract 4327.01, Harris County, Texas | 82.6% |
| 482014327013 | Block Group 3, Census Tract 4327.01, Harris County, Texas | 53.4% |
| 482014327021 | Block Group 1, Census Tract 4327.02, Harris County, Texas | 50.8% |
| 482014327022 | Block Group 2, Census Tract 4327.02, Harris County, Texas | 65.6% |
| 482014328011 | Block Group 1, Census Tract 4328.01, Harris County, Texas | 66.7% |
| 482014328012 | Block Group 2, Census Tract 4328.01, Harris County, Texas | 89.5% |
| 482014328013 | Block Group 3, Census Tract 4328.01, Harris County, Texas | 79.1% |
| 482014328021 | Block Group 1, Census Tract 4328.02, Harris County, Texas | 83.7% |
| 482014328022 | Block Group 2, Census Tract 4328.02, Harris County, Texas | 76.3% |
| 482014328023 | Block Group 3, Census Tract 4328.02, Harris County, Texas | 81.9% |
| 482014328024 | Block Group 4, Census Tract 4328.02, Harris County, Texas | 15.4% |
| 482014329011 | Block Group 1, Census Tract 4329.01, Harris County, Texas | 70.9% |
| 482014329012 | Block Group 2, Census Tract 4329.01, Harris County, Texas | 70.7% |
| 482014329021 | Block Group 1, Census Tract 4329.02, Harris County, Texas | 77.1% |
| 482014329022 | Block Group 2, Census Tract 4329.02, Harris County, Texas | 83.5% |
| 482014329023 | Block Group 3, Census Tract 4329.02, Harris County, Texas | 48.5% |
| 482014330011 | Block Group 1, Census Tract 4330.01, Harris County, Texas | 97.4% |
| 482014330012 | Block Group 2, Census Tract 4330.01, Harris County, Texas | 83.5% |
| 482014330013 | Block Group 3, Census Tract 4330.01, Harris County, Texas | 83.5% |
| 482014330021 | Block Group 1, Census Tract 4330.02, Harris County, Texas | 96.4% |
| 482014330022 | Block Group 2, Census Tract 4330.02, Harris County, Texas | 88.7% |
| 482014330031 | Block Group 1, Census Tract 4330.03, Harris County, Texas | 78.2% |
| 482014330032 | Block Group 2, Census Tract 4330.03, Harris County, Texas | 89.7% |
| 482014331001 | Block Group 1, Census Tract 4331, Harris County, Texas | 76.7% |
| 482014331002 | Block Group 2, Census Tract 4331, Harris County, Texas | 92.3% |
| 482014332011 | Block Group 1, Census Tract 4332.01, Harris County, Texas | 62.6% |
| 482014332012 | Block Group 2, Census Tract 4332.01, Harris County, Texas | 66.9% |
| 482014332013 | Block Group 3, Census Tract 4332.01, Harris County, Texas | 38.2% |
| 482014332021 | Block Group 1, Census Tract 4332.02, Harris County, Texas | 54.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014332022 | Block Group 2, Census Tract 4332.02, Harris County, Texas | 69.4% |
| 482014333001 | Block Group 1, Census Tract 4333, Harris County, Texas | 52.5% |
| 482014333002 | Block Group 2, Census Tract 4333, Harris County, Texas | 34.4% |
| 482014333003 | Block Group 3, Census Tract 4333, Harris County, Texas | 40.9% |
| 482014334001 | Block Group 1, Census Tract 4334, Harris County, Texas | 77.2% |
| 482014334002 | Block Group 2, Census Tract 4334, Harris County, Texas | 65.9% |
| 482014335011 | Block Group 1, Census Tract 4335.01, Harris County, Texas | 99.6% |
| 482014335012 | Block Group 2, Census Tract 4335.01, Harris County, Texas | 97.5% |
| 482014335013 | Block Group 3, Census Tract 4335.01, Harris County, Texas | 76.6% |
| 482014335021 | Block Group 1, Census Tract 4335.02, Harris County, Texas | 89.2% |
| 482014335022 | Block Group 2, Census Tract 4335.02, Harris County, Texas | 100.0% |
| 482014335023 | Block Group 3, Census Tract 4335.02, Harris County, Texas | 83.8% |
| 482014335024 | Block Group 4, Census Tract 4335.02, Harris County, Texas | 95.1% |
| 482014336001 | Block Group 1, Census Tract 4336, Harris County, Texas | 90.2% |
| 482014336002 | Block Group 2, Census Tract 4336, Harris County, Texas | 84.1% |
| 482014336003 | Block Group 3, Census Tract 4336, Harris County, Texas | 81.7% |
| 482014336004 | Block Group 4, Census Tract 4336, Harris County, Texas | 99.1% |
| 482014401001 | Block Group 1, Census Tract 4401, Harris County, Texas | 95.6% |
| 482014401002 | Block Group 2, Census Tract 4401, Harris County, Texas | 13.9% |
| 482014401003 | Block Group 3, Census Tract 4401, Harris County, Texas | 25.3% |
| 482014401004 | Block Group 4, Census Tract 4401, Harris County, Texas | 100.0% |
| 482014501001 | Block Group 1, Census Tract 4501, Harris County, Texas | 22.5% |
| 482014502001 | Block Group 1, Census Tract 4502, Harris County, Texas | 3.1% |
| 482014502002 | Block Group 2, Census Tract 4502, Harris County, Texas | 7.7% |
| 482014502003 | Block Group 3, Census Tract 4502, Harris County, Texas | 12.4% |
| 482014503001 | Block Group 1, Census Tract 4503, Harris County, Texas | 44.9% |
| 482014503002 | Block Group 2, Census Tract 4503, Harris County, Texas | 9.3% |
| 482014503003 | Block Group 3, Census Tract 4503, Harris County, Texas | 5.8% |
| 482014503004 | Block Group 4, Census Tract 4503, Harris County, Texas | 53.0% |
| 482014504001 | Block Group 1, Census Tract 4504, Harris County, Texas | 15.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014504002 | Block Group 2, Census Tract 4504, Harris County, Texas | 42.1% |
| 482014504003 | Block Group 3, Census Tract 4504, Harris County, Texas | 25.6% |
| 482014505001 | Block Group 1, Census Tract 4505, Harris County, Texas | 9.6% |
| 482014505002 | Block Group 2, Census Tract 4505, Harris County, Texas | 17.4% |
| 482014506001 | Block Group 1, Census Tract 4506, Harris County, Texas | 2.4% |
| 482014506002 | Block Group 2, Census Tract 4506, Harris County, Texas | 45.8% |
| 482014506003 | Block Group 3, Census Tract 4506, Harris County, Texas | 26.4% |
| 482014507001 | Block Group 1, Census Tract 4507, Harris County, Texas | 3.7% |
| 482014507002 | Block Group 2, Census Tract 4507, Harris County, Texas | 8.6% |
| 482014507003 | Block Group 3, Census Tract 4507, Harris County, Texas | 8.0% |
| 482014508011 | Block Group 1, Census Tract 4508.01, Harris County, Texas | 7.8% |
| 482014508012 | Block Group 2, Census Tract 4508.01, Harris County, Texas | 30.1% |
| 482014508021 | Block Group 1, Census Tract 4508.02, Harris County, Texas | 4.8% |
| 482014508022 | Block Group 2, Census Tract 4508.02, Harris County, Texas | 83.6% |
| 482014508023 | Block Group 3, Census Tract 4508.02, Harris County, Texas | 43.2% |
| 482014508024 | Block Group 4, Census Tract 4508.02, Harris County, Texas | 61.0% |
| 482014508025 | Block Group 5, Census Tract 4508.02, Harris County, Texas | 45.0% |
| 482014509001 | Block Group 1, Census Tract 4509, Harris County, Texas | 20.9% |
| 482014509002 | Block Group 2, Census Tract 4509, Harris County, Texas | 31.1% |
| 482014510011 | Block Group 1, Census Tract 4510.01, Harris County, Texas | 15.7% |
| 482014510012 | Block Group 2, Census Tract 4510.01, Harris County, Texas | 82.1% |
| 482014510013 | Block Group 3, Census Tract 4510.01, Harris County, Texas | 82.8% |
| 482014510021 | Block Group 1, Census Tract 4510.02, Harris County, Texas | 66.7% |
| 482014510022 | Block Group 2, Census Tract 4510.02, Harris County, Texas | 44.4% |
| 482014510023 | Block Group 3, Census Tract 4510.02, Harris County, Texas | 81.4% |
| 482014510024 | Block Group 4, Census Tract 4510.02, Harris County, Texas | 23.3% |
| 482014511001 | Block Group 1, Census Tract 4511, Harris County, Texas | 19.4% |
| 482014511002 | Block Group 2, Census Tract 4511, Harris County, Texas | 45.8% |
| 482014511003 | Block Group 3, Census Tract 4511, Harris County, Texas | 1.4% |
| 482014511004 | Block Group 4, Census Tract 4511, Harris County, Texas | 55.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014512001 | Block Group 1, Census Tract 4512, Harris County, Texas | 10.2% |
| 482014512002 | Block Group 2, Census Tract 4512, Harris County, Texas | 13.6% |
| 482014513001 | Block Group 1, Census Tract 4513, Harris County, Texas | 6.6% |
| 482014513002 | Block Group 2, Census Tract 4513, Harris County, Texas | 67.6% |
| 482014513003 | Block Group 3, Census Tract 4513, Harris County, Texas | 31.7% |
| 482014513004 | Block Group 4, Census Tract 4513, Harris County, Texas | 16.5% |
| 482014514011 | Block Group 1, Census Tract 4514.01, Harris County, Texas | 35.6% |
| 482014514012 | Block Group 2, Census Tract 4514.01, Harris County, Texas | 38.0% |
| 482014514021 | Block Group 1, Census Tract 4514.02, Harris County, Texas | 56.4% |
| 482014514022 | Block Group 2, Census Tract 4514.02, Harris County, Texas | 43.3% |
| 482014514031 | Block Group 1, Census Tract 4514.03, Harris County, Texas | 68.9% |
| 482014514032 | Block Group 2, Census Tract 4514.03, Harris County, Texas | 39.2% |
| 482014515001 | Block Group 1, Census Tract 4515, Harris County, Texas | 16.8% |
| 482014515002 | Block Group 2, Census Tract 4515, Harris County, Texas | 38.1% |
| 482014516011 | Block Group 1, Census Tract 4516.01, Harris County, Texas | 6.9% |
| 482014516012 | Block Group 2, Census Tract 4516.01, Harris County, Texas | 17.4% |
| 482014516021 | Block Group 1, Census Tract 4516.02, Harris County, Texas | 16.0% |
| 482014516022 | Block Group 2, Census Tract 4516.02, Harris County, Texas | 9.7% |
| 482014517001 | Block Group 1, Census Tract 4517, Harris County, Texas | 47.9% |
| 482014517002 | Block Group 2, Census Tract 4517, Harris County, Texas | 45.8% |
| 482014518001 | Block Group 1, Census Tract 4518, Harris County, Texas | 60.7% |
| 482014518002 | Block Group 2, Census Tract 4518, Harris County, Texas | 28.4% |
| 482014518003 | Block Group 3, Census Tract 4518, Harris County, Texas | 59.7% |
| 482014519011 | Block Group 1, Census Tract 4519.01, Harris County, Texas | 11.8% |
| 482014519012 | Block Group 2, Census Tract 4519.01, Harris County, Texas | 28.1% |
| 482014519013 | Block Group 3, Census Tract 4519.01, Harris County, Texas | 57.4% |
| 482014519014 | Block Group 4, Census Tract 4519.01, Harris County, Texas | 61.8% |
| 482014519021 | Block Group 1, Census Tract 4519.02, Harris County, Texas | 20.1% |
| 482014520001 | Block Group 1, Census Tract 4520, Harris County, Texas | 34.7% |
| 482014520002 | Block Group 2, Census Tract 4520, Harris County, Texas | 68.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014520003 | Block Group 3, Census Tract 4520, Harris County, Texas | 44.7% |
| 482014521001 | Block Group 1, Census Tract 4521, Harris County, Texas | 53.8% |
| 482014521002 | Block Group 2, Census Tract 4521, Harris County, Texas | 30.5% |
| 482014521003 | Block Group 3, Census Tract 4521, Harris County, Texas | 37.6% |
| 482014522011 | Block Group 1, Census Tract 4522.01, Harris County, Texas | 69.7% |
| 482014522012 | Block Group 2, Census Tract 4522.01, Harris County, Texas | 50.9% |
| 482014522013 | Block Group 3, Census Tract 4522.01, Harris County, Texas | 37.0% |
| 482014522014 | Block Group 4, Census Tract 4522.01, Harris County, Texas | 67.0% |
| 482014522021 | Block Group 1, Census Tract 4522.02, Harris County, Texas | 33.7% |
| 482014522022 | Block Group 2, Census Tract 4522.02, Harris County, Texas | 50.3% |
| 482014523001 | Block Group 1, Census Tract 4523, Harris County, Texas | 66.1% |
| 482014524001 | Block Group 1, Census Tract 4524, Harris County, Texas | 63.8% |
| 482014524002 | Block Group 2, Census Tract 4524, Harris County, Texas | 62.7% |
| 482014524003 | Block Group 3, Census Tract 4524, Harris County, Texas | 83.5% |
| 482014524004 | Block Group 4, Census Tract 4524, Harris County, Texas | 66.1% |
| 482014525001 | Block Group 1, Census Tract 4525, Harris County, Texas | 87.3% |
| 482014525002 | Block Group 2, Census Tract 4525, Harris County, Texas | 68.2% |
| 482014525003 | Block Group 3, Census Tract 4525, Harris County, Texas | 40.7% |
| 482014526001 | Block Group 1, Census Tract 4526, Harris County, Texas | 73.4% |
| 482014526002 | Block Group 2, Census Tract 4526, Harris County, Texas | 44.4% |
| 482014526003 | Block Group 3, Census Tract 4526, Harris County, Texas | 61.7% |
| 482014527001 | Block Group 1, Census Tract 4527, Harris County, Texas | 39.8% |
| 482014527002 | Block Group 2, Census Tract 4527, Harris County, Texas | 50.3% |
| 482014527003 | Block Group 3, Census Tract 4527, Harris County, Texas | 44.7% |
| 482014527004 | Block Group 4, Census Tract 4527, Harris County, Texas | 69.4% |
| 482014528011 | Block Group 1, Census Tract 4528.01, Harris County, Texas | 51.5% |
| 482014528012 | Block Group 2, Census Tract 4528.01, Harris County, Texas | 43.2% |
| 482014528013 | Block Group 3, Census Tract 4528.01, Harris County, Texas | 79.8% |
| 482014528021 | Block Group 1, Census Tract 4528.02, Harris County, Texas | 69.4% |
| 482014528022 | Block Group 2, Census Tract 4528.02, Harris County, Texas | 68.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014529001 | Block Group 1, Census Tract 4529, Harris County, Texas | 64.8% |
| 482014529002 | Block Group 2, Census Tract 4529, Harris County, Texas | 64.6% |
| 482014530001 | Block Group 1, Census Tract 4530, Harris County, Texas | 62.4% |
| 482014530002 | Block Group 2, Census Tract 4530, Harris County, Texas | 63.3% |
| 482014530003 | Block Group 3, Census Tract 4530, Harris County, Texas | 62.3% |
| 482014531001 | Block Group 1, Census Tract 4531, Harris County, Texas | 87.8% |
| 482014531002 | Block Group 2, Census Tract 4531, Harris County, Texas | 49.8% |
| 482014532001 | Block Group 1, Census Tract 4532, Harris County, Texas | 44.4% |
| 482014532002 | Block Group 2, Census Tract 4532, Harris County, Texas | 91.2% |
| 482014532003 | Block Group 3, Census Tract 4532, Harris County, Texas | 88.0% |
| 482014533001 | Block Group 1, Census Tract 4533, Harris County, Texas | 88.0% |
| 482014534011 | Block Group 1, Census Tract 4534.01, Harris County, Texas | 74.3% |
| 482014534012 | Block Group 2, Census Tract 4534.01, Harris County, Texas | 32.0% |
| 482014534021 | Block Group 1, Census Tract 4534.02, Harris County, Texas | 52.5% |
| 482014534022 | Block Group 2, Census Tract 4534.02, Harris County, Texas | 76.4% |
| 482014534023 | Block Group 3, Census Tract 4534.02, Harris County, Texas | 63.8% |
| 482014534024 | Block Group 4, Census Tract 4534.02, Harris County, Texas | 65.9% |
| 482014534031 | Block Group 1, Census Tract 4534.03, Harris County, Texas | 60.9% |
| 482014534032 | Block Group 2, Census Tract 4534.03, Harris County, Texas | 94.0% |
| 482014535011 | Block Group 1, Census Tract 4535.01, Harris County, Texas | 66.2% |
| 482014535012 | Block Group 2, Census Tract 4535.01, Harris County, Texas | 50.8% |
| 482014535013 | Block Group 3, Census Tract 4535.01, Harris County, Texas | 53.8% |
| 482014535021 | Block Group 1, Census Tract 4535.02, Harris County, Texas | 34.0% |
| 482014535022 | Block Group 2, Census Tract 4535.02, Harris County, Texas | 59.4% |
| 482014536011 | Block Group 1, Census Tract 4536.01, Harris County, Texas | 40.7% |
| 482014536021 | Block Group 1, Census Tract 4536.02, Harris County, Texas | 71.2% |
| 482014536022 | Block Group 2, Census Tract 4536.02, Harris County, Texas | 77.1% |
| 482014536023 | Block Group 3, Census Tract 4536.02, Harris County, Texas | 59.7% |
| 482014536024 | Block Group 4, Census Tract 4536.02, Harris County, Texas | 54.2% |
| 482014537001 | Block Group 1, Census Tract 4537, Harris County, Texas | 61.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014537002 | Block Group 2, Census Tract 4537, Harris County, Texas | 48.3% |
| 482014537003 | Block Group 3, Census Tract 4537, Harris County, Texas | 74.0% |
| 482014537004 | Block Group 4, Census Tract 4537, Harris County, Texas | 55.9% |
| 482014538001 | Block Group 1, Census Tract 4538, Harris County, Texas | 38.0% |
| 482014538002 | Block Group 2, Census Tract 4538, Harris County, Texas | 43.8% |
| 482014539001 | Block Group 1, Census Tract 4539, Harris County, Texas | 53.1% |
| 482014539002 | Block Group 2, Census Tract 4539, Harris County, Texas | 36.2% |
| 482014539003 | Block Group 3, Census Tract 4539, Harris County, Texas | 67.6% |
| 482014540001 | Block Group 1, Census Tract 4540, Harris County, Texas | 43.4% |
| 482014540002 | Block Group 2, Census Tract 4540, Harris County, Texas | 26.0% |
| 482014541001 | Block Group 1, Census Tract 4541, Harris County, Texas | 40.3% |
| 482014541002 | Block Group 2, Census Tract 4541, Harris County, Texas | 53.9% |
| 482014542001 | Block Group 1, Census Tract 4542, Harris County, Texas | 44.1% |
| 482014542002 | Block Group 2, Census Tract 4542, Harris County, Texas | 29.2% |
| 482014543011 | Block Group 1, Census Tract 4543.01, Harris County, Texas | 41.4% |
| 482014543012 | Block Group 2, Census Tract 4543.01, Harris County, Texas | 58.9% |
| 482014543013 | Block Group 3, Census Tract 4543.01, Harris County, Texas | 65.1% |
| 482014543014 | Block Group 4, Census Tract 4543.01, Harris County, Texas | 39.1% |
| 482014543021 | Block Group 1, Census Tract 4543.02, Harris County, Texas | 43.6% |
| 482014543022 | Block Group 2, Census Tract 4543.02, Harris County, Texas | 53.7% |
| 482014544001 | Block Group 1, Census Tract 4544, Harris County, Texas | 35.7% |
| 482014545011 | Block Group 1, Census Tract 4545.01, Harris County, Texas | 0.0% |
| 482014545012 | Block Group 2, Census Tract 4545.01, Harris County, Texas | 10.9% |
| 482014545013 | Block Group 3, Census Tract 4545.01, Harris County, Texas | 9.0% |
| 482014545021 | Block Group 1, Census Tract 4545.02, Harris County, Texas | 8.8% |
| 482014546001 | Block Group 1, Census Tract 4546, Harris County, Texas | 28.2% |
| 482014547001 | Block Group 1, Census Tract 4547, Harris County, Texas | 11.3% |
| 482014547002 | Block Group 2, Census Tract 4547, Harris County, Texas | 34.9% |
| 482014547003 | Block Group 3, Census Tract 4547, Harris County, Texas | 3.5% |
| 482014547004 | Block Group 4, Census Tract 4547, Harris County, Texas | 15.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482014548001 | Block Group 1, Census Tract 4548, Harris County, Texas | 9.6% |
| 482014548002 | Block Group 2, Census Tract 4548, Harris County, Texas | 35.2% |
| 482014548003 | Block Group 3, Census Tract 4548, Harris County, Texas | 34.7% |
| 482014549001 | Block Group 1, Census Tract 4549, Harris County, Texas | 3.0% |
| 482014549002 | Block Group 2, Census Tract 4549, Harris County, Texas | 19.3% |
| 482014550001 | Block Group 1, Census Tract 4550, Harris County, Texas | 13.2% |
| 482014551011 | Block Group 1, Census Tract 4551.01, Harris County, Texas | 46.2% |
| 482014551012 | Block Group 2, Census Tract 4551.01, Harris County, Texas | 30.9% |
| 482014551013 | Block Group 3, Census Tract 4551.01, Harris County, Texas | 17.4% |
| 482014551014 | Block Group 4, Census Tract 4551.01, Harris County, Texas | 21.9% |
| 482014551021 | Block Group 1, Census Tract 4551.02, Harris County, Texas | 10.5% |
| 482014551022 | Block Group 2, Census Tract 4551.02, Harris County, Texas | 22.4% |
| 482014552001 | Block Group 1, Census Tract 4552, Harris County, Texas | 15.8% |
| 482014552002 | Block Group 2, Census Tract 4552, Harris County, Texas | 14.0% |
| 482014552003 | Block Group 3, Census Tract 4552, Harris County, Texas | 0.9% |
| 482014553001 | Block Group 1, Census Tract 4553, Harris County, Texas | 39.5% |
| 482015101001 | Block Group 1, Census Tract 5101, Harris County, Texas | 50.9% |
| 482015101002 | Block Group 2, Census Tract 5101, Harris County, Texas | 83.3% |
| 482015102001 | Block Group 1, Census Tract 5102, Harris County, Texas | 65.1% |
| 482015102002 | Block Group 2, Census Tract 5102, Harris County, Texas | 28.7% |
| 482015103001 | Block Group 1, Census Tract 5103, Harris County, Texas | 22.0% |
| 482015103002 | Block Group 2, Census Tract 5103, Harris County, Texas | 17.8% |
| 482015103003 | Block Group 3, Census Tract 5103, Harris County, Texas | 13.4% |
| 482015103004 | Block Group 4, Census Tract 5103, Harris County, Texas | 11.9% |
| 482015103005 | Block Group 5, Census Tract 5103, Harris County, Texas | 40.5% |
| 482015104001 | Block Group 1, Census Tract 5104, Harris County, Texas | 44.0% |
| 482015104002 | Block Group 2, Census Tract 5104, Harris County, Texas | 32.3% |
| 482015104003 | Block Group 3, Census Tract 5104, Harris County, Texas | 24.6% |
| 482015105001 | Block Group 1, Census Tract 5105, Harris County, Texas | 41.0% |
| 482015105002 | Block Group 2, Census Tract 5105, Harris County, Texas | 69.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015105003 | Block Group 3, Census Tract 5105, Harris County, Texas | 20.1% |
| 482015106001 | Block Group 1, Census Tract 5106, Harris County, Texas | 54.2% |
| 482015106002 | Block Group 2, Census Tract 5106, Harris County, Texas | 47.6% |
| 482015106003 | Block Group 3, Census Tract 5106, Harris County, Texas | 19.1% |
| 482015107001 | Block Group 1, Census Tract 5107, Harris County, Texas | 13.1% |
| 482015107002 | Block Group 2, Census Tract 5107, Harris County, Texas | 31.3% |
| 482015108001 | Block Group 1, Census Tract 5108, Harris County, Texas | 8.7% |
| 482015108002 | Block Group 2, Census Tract 5108, Harris County, Texas | 11.0% |
| 482015108003 | Block Group 3, Census Tract 5108, Harris County, Texas | 18.4% |
| 482015108004 | Block Group 4, Census Tract 5108, Harris County, Texas | 18.9% |
| 482015108005 | Block Group 5, Census Tract 5108, Harris County, Texas | 37.5% |
| 482015108006 | Block Group 6, Census Tract 5108, Harris County, Texas | 9.1% |
| 482015109001 | Block Group 1, Census Tract 5109, Harris County, Texas | 20.7% |
| 482015109002 | Block Group 2, Census Tract 5109, Harris County, Texas | 41.3% |
| 482015109003 | Block Group 3, Census Tract 5109, Harris County, Texas | 35.8% |
| 482015110011 | Block Group 1, Census Tract 5110.01, Harris County, Texas | 17.6% |
| 482015110012 | Block Group 2, Census Tract 5110.01, Harris County, Texas | 39.9% |
| 482015110021 | Block Group 1, Census Tract 5110.02, Harris County, Texas | 25.8% |
| 482015110022 | Block Group 2, Census Tract 5110.02, Harris County, Texas | 45.4% |
| 482015110023 | Block Group 3, Census Tract 5110.02, Harris County, Texas | 11.7% |
| 482015111001 | Block Group 1, Census Tract 5111, Harris County, Texas | 40.4% |
| 482015111002 | Block Group 2, Census Tract 5111, Harris County, Texas | 40.4% |
| 482015112001 | Block Group 1, Census Tract 5112, Harris County, Texas | 47.1% |
| 482015112002 | Block Group 2, Census Tract 5112, Harris County, Texas | 35.4% |
| 482015112003 | Block Group 3, Census Tract 5112, Harris County, Texas | 11.5% |
| 482015113011 | Block Group 1, Census Tract 5113.01, Harris County, Texas | 39.9% |
| 482015113012 | Block Group 2, Census Tract 5113.01, Harris County, Texas | 6.5% |
| 482015113013 | Block Group 3, Census Tract 5113.01, Harris County, Texas | 49.0% |
| 482015113014 | Block Group 4, Census Tract 5113.01, Harris County, Texas | 33.1% |
| 482015113021 | Block Group 1, Census Tract 5113.02, Harris County, Texas | 18.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015113022 | Block Group 2, Census Tract 5113.02, Harris County, Texas | 41.9% |
| 482015113023 | Block Group 3, Census Tract 5113.02, Harris County, Texas | 51.3% |
| 482015114001 | Block Group 1, Census Tract 5114, Harris County, Texas | 32.4% |
| 482015114002 | Block Group 2, Census Tract 5114, Harris County, Texas | 25.1% |
| 482015114003 | Block Group 3, Census Tract 5114, Harris County, Texas | 62.9% |
| 482015115001 | Block Group 1, Census Tract 5115, Harris County, Texas | 77.3% |
| 482015115002 | Block Group 2, Census Tract 5115, Harris County, Texas | 61.4% |
| 482015115003 | Block Group 3, Census Tract 5115, Harris County, Texas | 40.0% |
| 482015115004 | Block Group 4, Census Tract 5115, Harris County, Texas | 17.1% |
| 482015115005 | Block Group 5, Census Tract 5115, Harris County, Texas | 50.8% |
| 482015115006 | Block Group 6, Census Tract 5115, Harris County, Texas | 21.2% |
| 482015115007 | Block Group 7, Census Tract 5115, Harris County, Texas | 47.6% |
| 482015116001 | Block Group 1, Census Tract 5116, Harris County, Texas | 67.5% |
| 482015116002 | Block Group 2, Census Tract 5116, Harris County, Texas | 65.1% |
| 482015116003 | Block Group 3, Census Tract 5116, Harris County, Texas | 64.7% |
| 482015116004 | Block Group 4, Census Tract 5116, Harris County, Texas | 56.4% |
| 482015201001 | Block Group 1, Census Tract 5201, Harris County, Texas | 48.5% |
| 482015202001 | Block Group 1, Census Tract 5202, Harris County, Texas | 14.7% |
| 482015202002 | Block Group 2, Census Tract 5202, Harris County, Texas | 11.6% |
| 482015202003 | Block Group 3, Census Tract 5202, Harris County, Texas | 33.8% |
| 482015203001 | Block Group 1, Census Tract 5203, Harris County, Texas | 51.8% |
| 482015203002 | Block Group 2, Census Tract 5203, Harris County, Texas | 87.1% |
| 482015203003 | Block Group 3, Census Tract 5203, Harris County, Texas | 45.5% |
| 482015204001 | Block Group 1, Census Tract 5204, Harris County, Texas | 77.0% |
| 482015204002 | Block Group 2, Census Tract 5204, Harris County, Texas | 74.6% |
| 482015205001 | Block Group 1, Census Tract 5205, Harris County, Texas | 80.0% |
| 482015205002 | Block Group 2, Census Tract 5205, Harris County, Texas | 81.8% |
| 482015205003 | Block Group 3, Census Tract 5205, Harris County, Texas | 63.0% |
| 482015205004 | Block Group 4, Census Tract 5205, Harris County, Texas | 52.9% |
| 482015206011 | Block Group 1, Census Tract 5206.01, Harris County, Texas | 75.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015206021 | Block Group 1, Census Tract 5206.02, Harris County, Texas | 76.3% |
| 482015206022 | Block Group 2, Census Tract 5206.02, Harris County, Texas | 73.8% |
| 482015206023 | Block Group 3, Census Tract 5206.02, Harris County, Texas | 65.4% |
| 482015206024 | Block Group 4, Census Tract 5206.02, Harris County, Texas | 68.2% |
| 482015207001 | Block Group 1, Census Tract 5207, Harris County, Texas | 50.4% |
| 482015207002 | Block Group 2, Census Tract 5207, Harris County, Texas | 34.3% |
| 482015207003 | Block Group 3, Census Tract 5207, Harris County, Texas | 29.8% |
| 482015207004 | Block Group 4, Census Tract 5207, Harris County, Texas | 48.5% |
| 482015210001 | Block Group 1, Census Tract 5210, Harris County, Texas | 80.3% |
| 482015211001 | Block Group 1, Census Tract 5211, Harris County, Texas | 68.1% |
| 482015212001 | Block Group 1, Census Tract 5212, Harris County, Texas | 84.1% |
| 482015212002 | Block Group 2, Census Tract 5212, Harris County, Texas | 57.5% |
| 482015212003 | Block Group 3, Census Tract 5212, Harris County, Texas | 68.0% |
| 482015213001 | Block Group 1, Census Tract 5213, Harris County, Texas | 61.0% |
| 482015213002 | Block Group 2, Census Tract 5213, Harris County, Texas | 62.5% |
| 482015213003 | Block Group 3, Census Tract 5213, Harris County, Texas | 38.5% |
| 482015213004 | Block Group 4, Census Tract 5213, Harris County, Texas | 56.3% |
| 482015214001 | Block Group 1, Census Tract 5214, Harris County, Texas | 91.0% |
| 482015214002 | Block Group 2, Census Tract 5214, Harris County, Texas | 95.0% |
| 482015214003 | Block Group 3, Census Tract 5214, Harris County, Texas | 54.1% |
| 482015214004 | Block Group 4, Census Tract 5214, Harris County, Texas | 84.9% |
| 482015215001 | Block Group 1, Census Tract 5215, Harris County, Texas | 84.6% |
| 482015215002 | Block Group 2, Census Tract 5215, Harris County, Texas | 55.0% |
| 482015215003 | Block Group 3, Census Tract 5215, Harris County, Texas | 54.2% |
| 482015215004 | Block Group 4, Census Tract 5215, Harris County, Texas | 24.8% |
| 482015216001 | Block Group 1, Census Tract 5216, Harris County, Texas | 51.4% |
| 482015216002 | Block Group 2, Census Tract 5216, Harris County, Texas | 76.4% |
| 482015217001 | Block Group 1, Census Tract 5217, Harris County, Texas | 86.5% |
| 482015217002 | Block Group 2, Census Tract 5217, Harris County, Texas | 81.6% |
| 482015217003 | Block Group 3, Census Tract 5217, Harris County, Texas | 61.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015217004 | Block Group 4, Census Tract 5217, Harris County, Texas | 77.9% |
| 482015218001 | Block Group 1, Census Tract 5218, Harris County, Texas | 42.9% |
| 482015218002 | Block Group 2, Census Tract 5218, Harris County, Texas | 29.8% |
| 482015219001 | Block Group 1, Census Tract 5219, Harris County, Texas | 18.8% |
| 482015219002 | Block Group 2, Census Tract 5219, Harris County, Texas | 58.0% |
| 482015219003 | Block Group 3, Census Tract 5219, Harris County, Texas | 46.0% |
| 482015220001 | Block Group 1, Census Tract 5220, Harris County, Texas | 35.7% |
| 482015220002 | Block Group 2, Census Tract 5220, Harris County, Texas | 44.0% |
| 482015220003 | Block Group 3, Census Tract 5220, Harris County, Texas | 63.8% |
| 482015221001 | Block Group 1, Census Tract 5221, Harris County, Texas | 76.8% |
| 482015221002 | Block Group 2, Census Tract 5221, Harris County, Texas | 41.8% |
| 482015221003 | Block Group 3, Census Tract 5221, Harris County, Texas | 69.0% |
| 482015221004 | Block Group 4, Census Tract 5221, Harris County, Texas | 74.7% |
| 482015222011 | Block Group 1, Census Tract 5222.01, Harris County, Texas | 46.1% |
| 482015222012 | Block Group 2, Census Tract 5222.01, Harris County, Texas | 46.2% |
| 482015222021 | Block Group 1, Census Tract 5222.02, Harris County, Texas | 31.1% |
| 482015222022 | Block Group 2, Census Tract 5222.02, Harris County, Texas | 39.6% |
| 482015223011 | Block Group 1, Census Tract 5223.01, Harris County, Texas | 62.4% |
| 482015223012 | Block Group 2, Census Tract 5223.01, Harris County, Texas | 71.5% |
| 482015223021 | Block Group 1, Census Tract 5223.02, Harris County, Texas | 65.0% |
| 482015223022 | Block Group 2, Census Tract 5223.02, Harris County, Texas | 29.4% |
| 482015224011 | Block Group 1, Census Tract 5224.01, Harris County, Texas | 21.0% |
| 482015224012 | Block Group 2, Census Tract 5224.01, Harris County, Texas | 24.3% |
| 482015224013 | Block Group 3, Census Tract 5224.01, Harris County, Texas | 56.4% |
| 482015224014 | Block Group 4, Census Tract 5224.01, Harris County, Texas | 91.4% |
| 482015224021 | Block Group 1, Census Tract 5224.02, Harris County, Texas | 46.6% |
| 482015224022 | Block Group 2, Census Tract 5224.02, Harris County, Texas | 37.0% |
| 482015225001 | Block Group 1, Census Tract 5225, Harris County, Texas | 11.6% |
| 482015225002 | Block Group 2, Census Tract 5225, Harris County, Texas | 17.1% |
| 482015225003 | Block Group 3, Census Tract 5225, Harris County, Texas | 7.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015225004 | Block Group 4, Census Tract 5225, Harris County, Texas | 6.8% |
| 482015301001 | Block Group 1, Census Tract 5301, Harris County, Texas | 50.6% |
| 482015301002 | Block Group 2, Census Tract 5301, Harris County, Texas | 74.8% |
| 482015301003 | Block Group 3, Census Tract 5301, Harris County, Texas | 69.6% |
| 482015301004 | Block Group 4, Census Tract 5301, Harris County, Texas | 77.3% |
| 482015302001 | Block Group 1, Census Tract 5302, Harris County, Texas | 15.1% |
| 482015302002 | Block Group 2, Census Tract 5302, Harris County, Texas | 54.1% |
| 482015302003 | Block Group 3, Census Tract 5302, Harris County, Texas | 49.0% |
| 482015303001 | Block Group 1, Census Tract 5303, Harris County, Texas | 89.5% |
| 482015303002 | Block Group 2, Census Tract 5303, Harris County, Texas | 69.1% |
| 482015303003 | Block Group 3, Census Tract 5303, Harris County, Texas | 78.8% |
| 482015304001 | Block Group 1, Census Tract 5304, Harris County, Texas | 73.2% |
| 482015304002 | Block Group 2, Census Tract 5304, Harris County, Texas | 79.7% |
| 482015305001 | Block Group 1, Census Tract 5305, Harris County, Texas | 78.4% |
| 482015305002 | Block Group 2, Census Tract 5305, Harris County, Texas | 55.5% |
| 482015305003 | Block Group 3, Census Tract 5305, Harris County, Texas | 91.2% |
| 482015306001 | Block Group 1, Census Tract 5306, Harris County, Texas | 79.7% |
| 482015306002 | Block Group 2, Census Tract 5306, Harris County, Texas | 54.7% |
| 482015307001 | Block Group 1, Census Tract 5307, Harris County, Texas | 88.3% |
| 482015307002 | Block Group 2, Census Tract 5307, Harris County, Texas | 60.0% |
| 482015307003 | Block Group 3, Census Tract 5307, Harris County, Texas | 61.0% |
| 482015308001 | Block Group 1, Census Tract 5308, Harris County, Texas | 81.4% |
| 482015308002 | Block Group 2, Census Tract 5308, Harris County, Texas | 56.1% |
| 482015308003 | Block Group 3, Census Tract 5308, Harris County, Texas | 31.7% |
| 482015309001 | Block Group 1, Census Tract 5309, Harris County, Texas | 42.1% |
| 482015309002 | Block Group 2, Census Tract 5309, Harris County, Texas | 58.8% |
| 482015309003 | Block Group 3, Census Tract 5309, Harris County, Texas | 23.1% |
| 482015310001 | Block Group 1, Census Tract 5310, Harris County, Texas | 44.1% |
| 482015310002 | Block Group 2, Census Tract 5310, Harris County, Texas | 40.3% |
| 482015311001 | Block Group 1, Census Tract 5311, Harris County, Texas | 32.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015311002 | Block Group 2, Census Tract 5311, Harris County, Texas | 47.7% |
| 482015312001 | Block Group 1, Census Tract 5312, Harris County, Texas | 48.1% |
| 482015312002 | Block Group 2, Census Tract 5312, Harris County, Texas | 31.7% |
| 482015312003 | Block Group 3, Census Tract 5312, Harris County, Texas | 45.7% |
| 482015313001 | Block Group 1, Census Tract 5313, Harris County, Texas | 93.7% |
| 482015313002 | Block Group 2, Census Tract 5313, Harris County, Texas | 25.7% |
| 482015313003 | Block Group 3, Census Tract 5313, Harris County, Texas | 80.2% |
| 482015314001 | Block Group 1, Census Tract 5314, Harris County, Texas | 34.3% |
| 482015315001 | Block Group 1, Census Tract 5315, Harris County, Texas | 62.9% |
| 482015315002 | Block Group 2, Census Tract 5315, Harris County, Texas | 34.4% |
| 482015315003 | Block Group 3, Census Tract 5315, Harris County, Texas | 46.2% |
| 482015316001 | Block Group 1, Census Tract 5316, Harris County, Texas | 22.6% |
| 482015316002 | Block Group 2, Census Tract 5316, Harris County, Texas | 30.0% |
| 482015317001 | Block Group 1, Census Tract 5317, Harris County, Texas | 17.1% |
| 482015317002 | Block Group 2, Census Tract 5317, Harris County, Texas | 15.8% |
| 482015318001 | Block Group 1, Census Tract 5318, Harris County, Texas | 74.1% |
| 482015318002 | Block Group 2, Census Tract 5318, Harris County, Texas | 55.5% |
| 482015319001 | Block Group 1, Census Tract 5319, Harris County, Texas | 83.9% |
| 482015319002 | Block Group 2, Census Tract 5319, Harris County, Texas | 67.4% |
| 482015319003 | Block Group 3, Census Tract 5319, Harris County, Texas | 48.4% |
| 482015320011 | Block Group 1, Census Tract 5320.01, Harris County, Texas | 78.0% |
| 482015320012 | Block Group 2, Census Tract 5320.01, Harris County, Texas | 57.9% |
| 482015320013 | Block Group 3, Census Tract 5320.01, Harris County, Texas | 62.3% |
| 482015320014 | Block Group 4, Census Tract 5320.01, Harris County, Texas | 93.1% |
| 482015320021 | Block Group 1, Census Tract 5320.02, Harris County, Texas | 16.8% |
| 482015321001 | Block Group 1, Census Tract 5321, Harris County, Texas | 72.7% |
| 482015321002 | Block Group 2, Census Tract 5321, Harris County, Texas | 68.6% |
| 482015321003 | Block Group 3, Census Tract 5321, Harris County, Texas | 23.4% |
| 482015321004 | Block Group 4, Census Tract 5321, Harris County, Texas | 95.7% |
| 482015322001 | Block Group 1, Census Tract 5322, Harris County, Texas | 94.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015322002 | Block Group 2, Census Tract 5322, Harris County, Texas | 66.5% |
| 482015323001 | Block Group 1, Census Tract 5323, Harris County, Texas | 24.4% |
| 482015323002 | Block Group 2, Census Tract 5323, Harris County, Texas | 0.0% |
| 482015323003 | Block Group 3, Census Tract 5323, Harris County, Texas | 58.5% |
| 482015323004 | Block Group 4, Census Tract 5323, Harris County, Texas | 31.0% |
| 482015324001 | Block Group 1, Census Tract 5324, Harris County, Texas | 45.4% |
| 482015324002 | Block Group 2, Census Tract 5324, Harris County, Texas | 19.7% |
| 482015324003 | Block Group 3, Census Tract 5324, Harris County, Texas | 52.9% |
| 482015325011 | Block Group 1, Census Tract 5325.01, Harris County, Texas | 38.7% |
| 482015325012 | Block Group 2, Census Tract 5325.01, Harris County, Texas | 33.2% |
| 482015325013 | Block Group 3, Census Tract 5325.01, Harris County, Texas | 48.8% |
| 482015325021 | Block Group 1, Census Tract 5325.02, Harris County, Texas | 64.2% |
| 482015325022 | Block Group 2, Census Tract 5325.02, Harris County, Texas | 45.8% |
| 482015325023 | Block Group 3, Census Tract 5325.02, Harris County, Texas | 57.5% |
| 482015326001 | Block Group 1, Census Tract 5326, Harris County, Texas | 56.6% |
| 482015326002 | Block Group 2, Census Tract 5326, Harris County, Texas | 42.3% |
| 482015326003 | Block Group 3, Census Tract 5326, Harris County, Texas | 49.6% |
| 482015327001 | Block Group 1, Census Tract 5327, Harris County, Texas | 55.3% |
| 482015327002 | Block Group 2, Census Tract 5327, Harris County, Texas | 28.3% |
| 482015327003 | Block Group 3, Census Tract 5327, Harris County, Texas | 46.0% |
| 482015328001 | Block Group 1, Census Tract 5328, Harris County, Texas | 53.9% |
| 482015329001 | Block Group 1, Census Tract 5329, Harris County, Texas | 58.2% |
| 482015329002 | Block Group 2, Census Tract 5329, Harris County, Texas | 55.1% |
| 482015329003 | Block Group 3, Census Tract 5329, Harris County, Texas | 27.6% |
| 482015330001 | Block Group 1, Census Tract 5330, Harris County, Texas | 92.2% |
| 482015331001 | Block Group 1, Census Tract 5331, Harris County, Texas | 40.9% |
| 482015331002 | Block Group 2, Census Tract 5331, Harris County, Texas | 70.9% |
| 482015331003 | Block Group 3, Census Tract 5331, Harris County, Texas | 42.0% |
| 482015332001 | Block Group 1, Census Tract 5332, Harris County, Texas | 80.9% |
| 482015332002 | Block Group 2, Census Tract 5332, Harris County, Texas | 86.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015332003 | Block Group 3, Census Tract 5332, Harris County, Texas | 60.2% |
| 482015333001 | Block Group 1, Census Tract 5333, Harris County, Texas | 65.2% |
| 482015333002 | Block Group 2, Census Tract 5333, Harris County, Texas | 87.0% |
| 482015333003 | Block Group 3, Census Tract 5333, Harris County, Texas | 69.3% |
| 482015333004 | Block Group 4, Census Tract 5333, Harris County, Texas | 82.3% |
| 482015334001 | Block Group 1, Census Tract 5334, Harris County, Texas | 87.7% |
| 482015334002 | Block Group 2, Census Tract 5334, Harris County, Texas | 62.5% |
| 482015334003 | Block Group 3, Census Tract 5334, Harris County, Texas | 31.0% |
| 482015334004 | Block Group 4, Census Tract 5334, Harris County, Texas | 64.5% |
| 482015335001 | Block Group 1, Census Tract 5335, Harris County, Texas | 44.2% |
| 482015335002 | Block Group 2, Census Tract 5335, Harris County, Texas | 48.3% |
| 482015335003 | Block Group 3, Census Tract 5335, Harris County, Texas | 51.0% |
| 482015336001 | Block Group 1, Census Tract 5336, Harris County, Texas | 91.3% |
| 482015336002 | Block Group 2, Census Tract 5336, Harris County, Texas | 62.1% |
| 482015337011 | Block Group 1, Census Tract 5337.01, Harris County, Texas | 92.9% |
| 482015337012 | Block Group 2, Census Tract 5337.01, Harris County, Texas | 54.0% |
| 482015337013 | Block Group 3, Census Tract 5337.01, Harris County, Texas | 69.1% |
| 482015337021 | Block Group 1, Census Tract 5337.02, Harris County, Texas | 42.0% |
| 482015337022 | Block Group 2, Census Tract 5337.02, Harris County, Texas | 66.9% |
| 482015338011 | Block Group 1, Census Tract 5338.01, Harris County, Texas | 59.3% |
| 482015338012 | Block Group 2, Census Tract 5338.01, Harris County, Texas | 42.2% |
| 482015338021 | Block Group 1, Census Tract 5338.02, Harris County, Texas | 80.8% |
| 482015338022 | Block Group 2, Census Tract 5338.02, Harris County, Texas | 56.9% |
| 482015338023 | Block Group 3, Census Tract 5338.02, Harris County, Texas | 51.2% |
| 482015339011 | Block Group 1, Census Tract 5339.01, Harris County, Texas | 46.1% |
| 482015339012 | Block Group 2, Census Tract 5339.01, Harris County, Texas | 64.5% |
| 482015339013 | Block Group 3, Census Tract 5339.01, Harris County, Texas | 49.7% |
| 482015339021 | Block Group 1, Census Tract 5339.02, Harris County, Texas | 84.2% |
| 482015339022 | Block Group 2, Census Tract 5339.02, Harris County, Texas | 76.8% |
| 482015340011 | Block Group 1, Census Tract 5340.01, Harris County, Texas | 81.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015340021 | Block Group 1, Census Tract 5340.02, Harris County, Texas | 57.9% |
| 482015340022 | Block Group 2, Census Tract 5340.02, Harris County, Texas | 44.4% |
| 482015340031 | Block Group 1, Census Tract 5340.03, Harris County, Texas | 43.4% |
| 482015341001 | Block Group 1, Census Tract 5341, Harris County, Texas | 31.9% |
| 482015341002 | Block Group 2, Census Tract 5341, Harris County, Texas | 67.9% |
| 482015341003 | Block Group 3, Census Tract 5341, Harris County, Texas | 28.3% |
| 482015342011 | Block Group 1, Census Tract 5342.01, Harris County, Texas | 67.5% |
| 482015342021 | Block Group 1, Census Tract 5342.02, Harris County, Texas | 26.3% |
| 482015342022 | Block Group 2, Census Tract 5342.02, Harris County, Texas | 35.9% |
| 482015342023 | Block Group 3, Census Tract 5342.02, Harris County, Texas | 23.1% |
| 482015342024 | Block Group 4, Census Tract 5342.02, Harris County, Texas | 20.2% |
| 482015342031 | Block Group 1, Census Tract 5342.03, Harris County, Texas | 55.5% |
| 482015401001 | Block Group 1, Census Tract 5401, Harris County, Texas | 8.5% |
| 482015401002 | Block Group 2, Census Tract 5401, Harris County, Texas | 18.9% |
| 482015401003 | Block Group 3, Census Tract 5401, Harris County, Texas | 27.7% |
| 482015402001 | Block Group 1, Census Tract 5402, Harris County, Texas | 57.9% |
| 482015405011 | Block Group 1, Census Tract 5405.01, Harris County, Texas | 68.2% |
| 482015405012 | Block Group 2, Census Tract 5405.01, Harris County, Texas | 96.1% |
| 482015405013 | Block Group 3, Census Tract 5405.01, Harris County, Texas | 73.1% |
| 482015405021 | Block Group 1, Census Tract 5405.02, Harris County, Texas | 10.7% |
| 482015405022 | Block Group 2, Census Tract 5405.02, Harris County, Texas | 11.3% |
| 482015405023 | Block Group 3, Census Tract 5405.02, Harris County, Texas | 53.0% |
| 482015406011 | Block Group 1, Census Tract 5406.01, Harris County, Texas | 13.9% |
| 482015406012 | Block Group 2, Census Tract 5406.01, Harris County, Texas | 10.7% |
| 482015406021 | Block Group 1, Census Tract 5406.02, Harris County, Texas | 39.3% |
| 482015406022 | Block Group 2, Census Tract 5406.02, Harris County, Texas | 21.6% |
| 482015407001 | Block Group 1, Census Tract 5407, Harris County, Texas | 26.7% |
| 482015407002 | Block Group 2, Census Tract 5407, Harris County, Texas | 50.3% |
| 482015407003 | Block Group 3, Census Tract 5407, Harris County, Texas | 35.9% |
| 482015408001 | Block Group 1, Census Tract 5408, Harris County, Texas | 42.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015408002 | Block Group 2, Census Tract 5408, Harris County, Texas | 33.3% |
| 482015408003 | Block Group 3, Census Tract 5408, Harris County, Texas | 38.9% |
| 482015409011 | Block Group 1, Census Tract 5409.01, Harris County, Texas | 4.1% |
| 482015409021 | Block Group 1, Census Tract 5409.02, Harris County, Texas | 44.1% |
| 482015409022 | Block Group 2, Census Tract 5409.02, Harris County, Texas | 26.2% |
| 482015409023 | Block Group 3, Census Tract 5409.02, Harris County, Texas | 12.2% |
| 482015410011 | Block Group 1, Census Tract 5410.01, Harris County, Texas | 25.2% |
| 482015410012 | Block Group 2, Census Tract 5410.01, Harris County, Texas | 53.1% |
| 482015410021 | Block Group 1, Census Tract 5410.02, Harris County, Texas | 13.6% |
| 482015410022 | Block Group 2, Census Tract 5410.02, Harris County, Texas | 13.0% |
| 482015410031 | Block Group 1, Census Tract 5410.03, Harris County, Texas | 6.4% |
| 482015410032 | Block Group 2, Census Tract 5410.03, Harris County, Texas | 9.5% |
| 482015411001 | Block Group 1, Census Tract 5411, Harris County, Texas | 13.1% |
| 482015411002 | Block Group 2, Census Tract 5411, Harris County, Texas | 4.4% |
| 482015411003 | Block Group 3, Census Tract 5411, Harris County, Texas | 16.2% |
| 482015412011 | Block Group 1, Census Tract 5412.01, Harris County, Texas | 19.9% |
| 482015412012 | Block Group 2, Census Tract 5412.01, Harris County, Texas | 13.5% |
| 482015412021 | Block Group 1, Census Tract 5412.02, Harris County, Texas | 12.0% |
| 482015412022 | Block Group 2, Census Tract 5412.02, Harris County, Texas | 36.5% |
| 482015412023 | Block Group 3, Census Tract 5412.02, Harris County, Texas | 0.0% |
| 482015412024 | Block Group 4, Census Tract 5412.02, Harris County, Texas | 30.3% |
| 482015412031 | Block Group 1, Census Tract 5412.03, Harris County, Texas | 11.4% |
| 482015412032 | Block Group 2, Census Tract 5412.03, Harris County, Texas | 19.6% |
| 482015413001 | Block Group 1, Census Tract 5413, Harris County, Texas | 53.1% |
| 482015413002 | Block Group 2, Census Tract 5413, Harris County, Texas | 73.5% |
| 482015413003 | Block Group 3, Census Tract 5413, Harris County, Texas | 64.1% |
| 482015413004 | Block Group 4, Census Tract 5413, Harris County, Texas | 42.0% |
| 482015414001 | Block Group 1, Census Tract 5414, Harris County, Texas | 24.7% |
| 482015414002 | Block Group 2, Census Tract 5414, Harris County, Texas | 52.1% |
| 482015415001 | Block Group 1, Census Tract 5415, Harris County, Texas | 23.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015415002 | Block Group 2, Census Tract 5415, Harris County, Texas | 29.9% |
| 482015416011 | Block Group 1, Census Tract 5416.01, Harris County, Texas | 18.8% |
| 482015416012 | Block Group 2, Census Tract 5416.01, Harris County, Texas | 5.9% |
| 482015416021 | Block Group 1, Census Tract 5416.02, Harris County, Texas | 72.5% |
| 482015416022 | Block Group 2, Census Tract 5416.02, Harris County, Texas | 35.9% |
| 482015416023 | Block Group 3, Census Tract 5416.02, Harris County, Texas | 51.6% |
| 482015416024 | Block Group 4, Census Tract 5416.02, Harris County, Texas | 43.3% |
| 482015417001 | Block Group 1, Census Tract 5417, Harris County, Texas | 43.2% |
| 482015417002 | Block Group 2, Census Tract 5417, Harris County, Texas | 47.6% |
| 482015417003 | Block Group 3, Census Tract 5417, Harris County, Texas | 37.8% |
| 482015418001 | Block Group 1, Census Tract 5418, Harris County, Texas | 42.7% |
| 482015418002 | Block Group 2, Census Tract 5418, Harris County, Texas | 45.8% |
| 482015419001 | Block Group 1, Census Tract 5419, Harris County, Texas | 50.6% |
| 482015419002 | Block Group 2, Census Tract 5419, Harris County, Texas | 16.3% |
| 482015420001 | Block Group 1, Census Tract 5420, Harris County, Texas | 36.6% |
| 482015420002 | Block Group 2, Census Tract 5420, Harris County, Texas | 27.0% |
| 482015420003 | Block Group 3, Census Tract 5420, Harris County, Texas | 40.9% |
| 482015420004 | Block Group 4, Census Tract 5420, Harris County, Texas | 44.9% |
| 482015421011 | Block Group 1, Census Tract 5421.01, Harris County, Texas | 37.1% |
| 482015421012 | Block Group 2, Census Tract 5421.01, Harris County, Texas | 23.1% |
| 482015421021 | Block Group 1, Census Tract 5421.02, Harris County, Texas | 26.0% |
| 482015421022 | Block Group 2, Census Tract 5421.02, Harris County, Texas | 39.3% |
| 482015422001 | Block Group 1, Census Tract 5422, Harris County, Texas | 50.4% |
| 482015422002 | Block Group 2, Census Tract 5422, Harris County, Texas | 47.7% |
| 482015423011 | Block Group 1, Census Tract 5423.01, Harris County, Texas | 13.9% |
| 482015423012 | Block Group 2, Census Tract 5423.01, Harris County, Texas | 41.9% |
| 482015423013 | Block Group 3, Census Tract 5423.01, Harris County, Texas | 10.5% |
| 482015423014 | Block Group 4, Census Tract 5423.01, Harris County, Texas | 5.4% |
| 482015423021 | Block Group 1, Census Tract 5423.02, Harris County, Texas | 35.5% |
| 482015424001 | Block Group 1, Census Tract 5424, Harris County, Texas | 36.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015424002 | Block Group 2, Census Tract 5424, Harris County, Texas | 48.2% |
| 482015424003 | Block Group 3, Census Tract 5424, Harris County, Texas | 67.7% |
| 482015425001 | Block Group 1, Census Tract 5425, Harris County, Texas | 13.7% |
| 482015426001 | Block Group 1, Census Tract 5426, Harris County, Texas | 25.0% |
| 482015427001 | Block Group 1, Census Tract 5427, Harris County, Texas | 36.8% |
| 482015427002 | Block Group 2, Census Tract 5427, Harris County, Texas | 27.4% |
| 482015428001 | Block Group 1, Census Tract 5428, Harris County, Texas | 14.7% |
| 482015428002 | Block Group 2, Census Tract 5428, Harris County, Texas | 20.4% |
| 482015428003 | Block Group 3, Census Tract 5428, Harris County, Texas | 54.2% |
| 482015429001 | Block Group 1, Census Tract 5429, Harris County, Texas | 46.4% |
| 482015429002 | Block Group 2, Census Tract 5429, Harris County, Texas | 11.1% |
| 482015429003 | Block Group 3, Census Tract 5429, Harris County, Texas | 20.3% |
| 482015430011 | Block Group 1, Census Tract 5430.01, Harris County, Texas | 14.2% |
| 482015430012 | Block Group 2, Census Tract 5430.01, Harris County, Texas | 40.3% |
| 482015430021 | Block Group 1, Census Tract 5430.02, Harris County, Texas | 7.0% |
| 482015430022 | Block Group 2, Census Tract 5430.02, Harris County, Texas | 29.3% |
| 482015430031 | Block Group 1, Census Tract 5430.03, Harris County, Texas | 42.9% |
| 482015431001 | Block Group 1, Census Tract 5431, Harris County, Texas | 34.6% |
| 482015432001 | Block Group 1, Census Tract 5432, Harris County, Texas | 47.6% |
| 482015432002 | Block Group 2, Census Tract 5432, Harris County, Texas | 33.4% |
| 482015432003 | Block Group 3, Census Tract 5432, Harris County, Texas | 64.2% |
| 482015501001 | Block Group 1, Census Tract 5501, Harris County, Texas | 91.6% |
| 482015501002 | Block Group 2, Census Tract 5501, Harris County, Texas | 88.6% |
| 482015502001 | Block Group 1, Census Tract 5502, Harris County, Texas | 89.7% |
| 482015502002 | Block Group 2, Census Tract 5502, Harris County, Texas | 93.4% |
| 482015503011 | Block Group 1, Census Tract 5503.01, Harris County, Texas | 63.3% |
| 482015503012 | Block Group 2, Census Tract 5503.01, Harris County, Texas | 79.8% |
| 482015503013 | Block Group 3, Census Tract 5503.01, Harris County, Texas | 76.0% |
| 482015503021 | Block Group 1, Census Tract 5503.02, Harris County, Texas | 24.5% |
| 482015503022 | Block Group 2, Census Tract 5503.02, Harris County, Texas | 40.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015503023 | Block Group 3, Census Tract 5503.02, Harris County, Texas | 61.5% |
| 482015503024 | Block Group 4, Census Tract 5503.02, Harris County, Texas | 41.2% |
| 482015504011 | Block Group 1, Census Tract 5504.01, Harris County, Texas | 65.2% |
| 482015504012 | Block Group 2, Census Tract 5504.01, Harris County, Texas | 51.8% |
| 482015504013 | Block Group 3, Census Tract 5504.01, Harris County, Texas | 60.4% |
| 482015504014 | Block Group 4, Census Tract 5504.01, Harris County, Texas | 47.3% |
| 482015504021 | Block Group 1, Census Tract 5504.02, Harris County, Texas | 41.8% |
| 482015504022 | Block Group 2, Census Tract 5504.02, Harris County, Texas | 74.2% |
| 482015504023 | Block Group 3, Census Tract 5504.02, Harris County, Texas | 19.5% |
| 482015505001 | Block Group 1, Census Tract 5505, Harris County, Texas | 56.0% |
| 482015505002 | Block Group 2, Census Tract 5505, Harris County, Texas | 52.3% |
| 482015506011 | Block Group 1, Census Tract 5506.01, Harris County, Texas | 51.2% |
| 482015506012 | Block Group 2, Census Tract 5506.01, Harris County, Texas | 55.1% |
| 482015506021 | Block Group 1, Census Tract 5506.02, Harris County, Texas | 43.0% |
| 482015506022 | Block Group 2, Census Tract 5506.02, Harris County, Texas | 45.7% |
| 482015506031 | Block Group 1, Census Tract 5506.03, Harris County, Texas | 69.3% |
| 482015506032 | Block Group 2, Census Tract 5506.03, Harris County, Texas | 79.6% |
| 482015506033 | Block Group 3, Census Tract 5506.03, Harris County, Texas | 41.3% |
| 482015507001 | Block Group 1, Census Tract 5507, Harris County, Texas | 21.3% |
| 482015507002 | Block Group 2, Census Tract 5507, Harris County, Texas | 40.2% |
| 482015508001 | Block Group 1, Census Tract 5508, Harris County, Texas | 23.6% |
| 482015508002 | Block Group 2, Census Tract 5508, Harris County, Texas | 45.8% |
| 482015509001 | Block Group 1, Census Tract 5509, Harris County, Texas | 21.7% |
| 482015509002 | Block Group 2, Census Tract 5509, Harris County, Texas | 54.5% |
| 482015509003 | Block Group 3, Census Tract 5509, Harris County, Texas | 62.8% |
| 482015509004 | Block Group 4, Census Tract 5509, Harris County, Texas | 29.8% |
| 482015510001 | Block Group 1, Census Tract 5510, Harris County, Texas | 66.5% |
| 482015511001 | Block Group 1, Census Tract 5511, Harris County, Texas | 73.6% |
| 482015511002 | Block Group 2, Census Tract 5511, Harris County, Texas | 73.4% |
| 482015511003 | Block Group 3, Census Tract 5511, Harris County, Texas | 41.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015511004 | Block Group 4, Census Tract 5511, Harris County, Texas | 14.0% |
| 482015511005 | Block Group 5, Census Tract 5511, Harris County, Texas | 26.0% |
| 482015512001 | Block Group 1, Census Tract 5512, Harris County, Texas | 47.4% |
| 482015512002 | Block Group 2, Census Tract 5512, Harris County, Texas | 16.1% |
| 482015512003 | Block Group 3, Census Tract 5512, Harris County, Texas | 9.8% |
| 482015512004 | Block Group 4, Census Tract 5512, Harris County, Texas | 64.4% |
| 482015513001 | Block Group 1, Census Tract 5513, Harris County, Texas | 20.3% |
| 482015513002 | Block Group 2, Census Tract 5513, Harris County, Texas | 21.5% |
| 482015514001 | Block Group 1, Census Tract 5514, Harris County, Texas | 22.7% |
| 482015514002 | Block Group 2, Census Tract 5514, Harris County, Texas | 23.2% |
| 482015514003 | Block Group 3, Census Tract 5514, Harris County, Texas | 38.7% |
| 482015515001 | Block Group 1, Census Tract 5515, Harris County, Texas | 50.9% |
| 482015515002 | Block Group 2, Census Tract 5515, Harris County, Texas | 53.4% |
| 482015516001 | Block Group 1, Census Tract 5516, Harris County, Texas | 63.0% |
| 482015516002 | Block Group 2, Census Tract 5516, Harris County, Texas | 50.4% |
| 482015516003 | Block Group 3, Census Tract 5516, Harris County, Texas | 39.3% |
| 482015517011 | Block Group 1, Census Tract 5517.01, Harris County, Texas | 20.6% |
| 482015517012 | Block Group 2, Census Tract 5517.01, Harris County, Texas | 33.9% |
| 482015517013 | Block Group 3, Census Tract 5517.01, Harris County, Texas | 20.8% |
| 482015517014 | Block Group 4, Census Tract 5517.01, Harris County, Texas | 34.7% |
| 482015517015 | Block Group 5, Census Tract 5517.01, Harris County, Texas | 3.0% |
| 482015517016 | Block Group 6, Census Tract 5517.01, Harris County, Texas | 17.9% |
| 482015517021 | Block Group 1, Census Tract 5517.02, Harris County, Texas | 12.5% |
| 482015517022 | Block Group 2, Census Tract 5517.02, Harris County, Texas | 6.9% |
| 482015517031 | Block Group 1, Census Tract 5517.03, Harris County, Texas | 11.1% |
| 482015517032 | Block Group 2, Census Tract 5517.03, Harris County, Texas | 23.2% |
| 482015517033 | Block Group 3, Census Tract 5517.03, Harris County, Texas | 10.2% |
| 482015518001 | Block Group 1, Census Tract 5518, Harris County, Texas | 14.8% |
| 482015518002 | Block Group 2, Census Tract 5518, Harris County, Texas | 11.8% |
| 482015518003 | Block Group 3, Census Tract 5518, Harris County, Texas | 30.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015519001 | Block Group 1, Census Tract 5519, Harris County, Texas | 34.5% |
| 482015519002 | Block Group 2, Census Tract 5519, Harris County, Texas | 46.0% |
| 482015519003 | Block Group 3, Census Tract 5519, Harris County, Texas | 47.6% |
| 482015520011 | Block Group 1, Census Tract 5520.01, Harris County, Texas | 32.6% |
| 482015520012 | Block Group 2, Census Tract 5520.01, Harris County, Texas | 45.1% |
| 482015520013 | Block Group 3, Census Tract 5520.01, Harris County, Texas | 45.8% |
| 482015520021 | Block Group 1, Census Tract 5520.02, Harris County, Texas | 14.3% |
| 482015521011 | Block Group 1, Census Tract 5521.01, Harris County, Texas | 31.1% |
| 482015521021 | Block Group 1, Census Tract 5521.02, Harris County, Texas | 7.2% |
| 482015521022 | Block Group 2, Census Tract 5521.02, Harris County, Texas | 5.4% |
| 482015521023 | Block Group 3, Census Tract 5521.02, Harris County, Texas | 57.6% |
| 482015521031 | Block Group 1, Census Tract 5521.03, Harris County, Texas | 28.7% |
| 482015521032 | Block Group 2, Census Tract 5521.03, Harris County, Texas | 32.6% |
| 482015522001 | Block Group 1, Census Tract 5522, Harris County, Texas | 24.2% |
| 482015522002 | Block Group 2, Census Tract 5522, Harris County, Texas | 41.3% |
| 482015522003 | Block Group 3, Census Tract 5522, Harris County, Texas | 42.9% |
| 482015523011 | Block Group 1, Census Tract 5523.01, Harris County, Texas | 27.2% |
| 482015523012 | Block Group 2, Census Tract 5523.01, Harris County, Texas | 20.0% |
| 482015523021 | Block Group 1, Census Tract 5523.02, Harris County, Texas | 27.5% |
| 482015523022 | Block Group 2, Census Tract 5523.02, Harris County, Texas | 43.5% |
| 482015524001 | Block Group 1, Census Tract 5524, Harris County, Texas | 51.5% |
| 482015524002 | Block Group 2, Census Tract 5524, Harris County, Texas | 17.3% |
| 482015524003 | Block Group 3, Census Tract 5524, Harris County, Texas | 68.4% |
| 482015525001 | Block Group 1, Census Tract 5525, Harris County, Texas | 36.3% |
| 482015525002 | Block Group 2, Census Tract 5525, Harris County, Texas | 32.1% |
| 482015525003 | Block Group 3, Census Tract 5525, Harris County, Texas | 7.6% |
| 482015526011 | Block Group 1, Census Tract 5526.01, Harris County, Texas | 60.9% |
| 482015526021 | Block Group 1, Census Tract 5526.02, Harris County, Texas | 22.9% |
| 482015526022 | Block Group 2, Census Tract 5526.02, Harris County, Texas | 16.6% |
| 482015527001 | Block Group 1, Census Tract 5527, Harris County, Texas | 43.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015527002 | Block Group 2, Census Tract 5527, Harris County, Texas | 48.2% |
| 482015527003 | Block Group 3, Census Tract 5527, Harris County, Texas | 13.2% |
| 482015528001 | Block Group 1, Census Tract 5528, Harris County, Texas | 9.8% |
| 482015528002 | Block Group 2, Census Tract 5528, Harris County, Texas | 27.0% |
| 482015528003 | Block Group 3, Census Tract 5528, Harris County, Texas | 25.2% |
| 482015528004 | Block Group 4, Census Tract 5528, Harris County, Texas | 19.6% |
| 482015528005 | Block Group 5, Census Tract 5528, Harris County, Texas | 14.7% |
| 482015529001 | Block Group 1, Census Tract 5529, Harris County, Texas | 0.9% |
| 482015529002 | Block Group 2, Census Tract 5529, Harris County, Texas | 32.5% |
| 482015529003 | Block Group 3, Census Tract 5529, Harris County, Texas | 50.6% |
| 482015529004 | Block Group 4, Census Tract 5529, Harris County, Texas | 36.6% |
| 482015529005 | Block Group 5, Census Tract 5529, Harris County, Texas | 4.0% |
| 482015530011 | Block Group 1, Census Tract 5530.01, Harris County, Texas | 9.5% |
| 482015530012 | Block Group 2, Census Tract 5530.01, Harris County, Texas | 1.7% |
| 482015530013 | Block Group 3, Census Tract 5530.01, Harris County, Texas | 38.3% |
| 482015530021 | Block Group 1, Census Tract 5530.02, Harris County, Texas | 78.0% |
| 482015530022 | Block Group 2, Census Tract 5530.02, Harris County, Texas | 13.0% |
| 482015531001 | Block Group 1, Census Tract 5531, Harris County, Texas | 20.5% |
| 482015531002 | Block Group 2, Census Tract 5531, Harris County, Texas | 40.4% |
| 482015531003 | Block Group 3, Census Tract 5531, Harris County, Texas | 35.9% |
| 482015531004 | Block Group 4, Census Tract 5531, Harris County, Texas | 52.4% |
| 482015532001 | Block Group 1, Census Tract 5532, Harris County, Texas | 24.2% |
| 482015532002 | Block Group 2, Census Tract 5532, Harris County, Texas | 72.3% |
| 482015532003 | Block Group 3, Census Tract 5532, Harris County, Texas | 81.0% |
| 482015532004 | Block Group 4, Census Tract 5532, Harris County, Texas | 83.1% |
| 482015533001 | Block Group 1, Census Tract 5533, Harris County, Texas | 73.8% |
| 482015533002 | Block Group 2, Census Tract 5533, Harris County, Texas | 52.5% |
| 482015534011 | Block Group 1, Census Tract 5534.01, Harris County, Texas | 19.4% |
| 482015534012 | Block Group 2, Census Tract 5534.01, Harris County, Texas | 20.8% |
| 482015534021 | Block Group 1, Census Tract 5534.02, Harris County, Texas | 38.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015534022 | Block Group 2, Census Tract 5534.02, Harris County, Texas | 9.5% |
| 482015534023 | Block Group 3, Census Tract 5534.02, Harris County, Texas | 27.2% |
| 482015534024 | Block Group 4, Census Tract 5534.02, Harris County, Texas | 5.0% |
| 482015534031 | Block Group 1, Census Tract 5534.03, Harris County, Texas | 14.8% |
| 482015535001 | Block Group 1, Census Tract 5535, Harris County, Texas | 34.5% |
| 482015535002 | Block Group 2, Census Tract 5535, Harris County, Texas | 19.7% |
| 482015535003 | Block Group 3, Census Tract 5535, Harris County, Texas | 13.3% |
| 482015536001 | Block Group 1, Census Tract 5536, Harris County, Texas | 50.1% |
| 482015536002 | Block Group 2, Census Tract 5536, Harris County, Texas | 10.1% |
| 482015537001 | Block Group 1, Census Tract 5537, Harris County, Texas | 11.8% |
| 482015537002 | Block Group 2, Census Tract 5537, Harris County, Texas | 15.4% |
| 482015538011 | Block Group 1, Census Tract 5538.01, Harris County, Texas | 14.6% |
| 482015538021 | Block Group 1, Census Tract 5538.02, Harris County, Texas | 21.5% |
| 482015538022 | Block Group 2, Census Tract 5538.02, Harris County, Texas | 5.3% |
| 482015538023 | Block Group 3, Census Tract 5538.02, Harris County, Texas | 14.0% |
| 482015538024 | Block Group 4, Census Tract 5538.02, Harris County, Texas | 45.1% |
| 482015539001 | Block Group 1, Census Tract 5539, Harris County, Texas | 13.6% |
| 482015539002 | Block Group 2, Census Tract 5539, Harris County, Texas | 16.0% |
| 482015539003 | Block Group 3, Census Tract 5539, Harris County, Texas | 7.7% |
| 482015539004 | Block Group 4, Census Tract 5539, Harris County, Texas | 15.2% |
| 482015540011 | Block Group 1, Census Tract 5540.01, Harris County, Texas | 65.5% |
| 482015540012 | Block Group 2, Census Tract 5540.01, Harris County, Texas | 16.8% |
| 482015540021 | Block Group 1, Census Tract 5540.02, Harris County, Texas | 10.7% |
| 482015540022 | Block Group 2, Census Tract 5540.02, Harris County, Texas | 4.3% |
| 482015541011 | Block Group 1, Census Tract 5541.01, Harris County, Texas | 16.9% |
| 482015541021 | Block Group 1, Census Tract 5541.02, Harris County, Texas | 37.0% |
| 482015541022 | Block Group 2, Census Tract 5541.02, Harris County, Texas | 20.9% |
| 482015541023 | Block Group 3, Census Tract 5541.02, Harris County, Texas | 20.0% |
| 482015542001 | Block Group 1, Census Tract 5542, Harris County, Texas | 27.7% |
| 482015542002 | Block Group 2, Census Tract 5542, Harris County, Texas | 32.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015542003 | Block Group 3, Census Tract 5542, Harris County, Texas | 45.5% |
| 482015543011 | Block Group 1, Census Tract 5543.01, Harris County, Texas | 2.2% |
| 482015543012 | Block Group 2, Census Tract 5543.01, Harris County, Texas | 3.3% |
| 482015543013 | Block Group 3, Census Tract 5543.01, Harris County, Texas | 9.7% |
| 482015543014 | Block Group 4, Census Tract 5543.01, Harris County, Texas | 7.1% |
| 482015543021 | Block Group 1, Census Tract 5543.02, Harris County, Texas | 41.9% |
| 482015543022 | Block Group 2, Census Tract 5543.02, Harris County, Texas | 22.0% |
| 482015544011 | Block Group 1, Census Tract 5544.01, Harris County, Texas | 5.5% |
| 482015544012 | Block Group 2, Census Tract 5544.01, Harris County, Texas | 9.8% |
| 482015544021 | Block Group 1, Census Tract 5544.02, Harris County, Texas | 5.3% |
| 482015544022 | Block Group 2, Census Tract 5544.02, Harris County, Texas | 16.3% |
| 482015544031 | Block Group 1, Census Tract 5544.03, Harris County, Texas | 15.7% |
| 482015545011 | Block Group 1, Census Tract 5545.01, Harris County, Texas | 12.6% |
| 482015545012 | Block Group 2, Census Tract 5545.01, Harris County, Texas | 27.5% |
| 482015545021 | Block Group 1, Census Tract 5545.02, Harris County, Texas | 0.0% |
| 482015545022 | Block Group 2, Census Tract 5545.02, Harris County, Texas | 8.7% |
| 482015545023 | Block Group 3, Census Tract 5545.02, Harris County, Texas | 1.5% |
| 482015546001 | Block Group 1, Census Tract 5546, Harris County, Texas | 8.4% |
| 482015546002 | Block Group 2, Census Tract 5546, Harris County, Texas | 4.0% |
| 482015547001 | Block Group 1, Census Tract 5547, Harris County, Texas | 33.7% |
| 482015547002 | Block Group 2, Census Tract 5547, Harris County, Texas | 8.7% |
| 482015548011 | Block Group 1, Census Tract 5548.01, Harris County, Texas | 30.1% |
| 482015548021 | Block Group 1, Census Tract 5548.02, Harris County, Texas | 17.1% |
| 482015548022 | Block Group 2, Census Tract 5548.02, Harris County, Texas | 15.4% |
| 482015549011 | Block Group 1, Census Tract 5549.01, Harris County, Texas | 33.8% |
| 482015549012 | Block Group 2, Census Tract 5549.01, Harris County, Texas | 32.8% |
| 482015549021 | Block Group 1, Census Tract 5549.02, Harris County, Texas | 10.9% |
| 482015549022 | Block Group 2, Census Tract 5549.02, Harris County, Texas | 0.2% |
| 482015549031 | Block Group 1, Census Tract 5549.03, Harris County, Texas | 5.9% |
| 482015550001 | Block Group 1, Census Tract 5550, Harris County, Texas | 21.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482015550002 | Block Group 2, Census Tract 5550, Harris County, Texas | 10.9% |
| 482015550003 | Block Group 3, Census Tract 5550, Harris County, Texas | 23.6% |
| 482015551001 | Block Group 1, Census Tract 5551, Harris County, Texas | 21.6% |
| 482015551002 | Block Group 2, Census Tract 5551, Harris County, Texas | 21.7% |
| 482015551003 | Block Group 3, Census Tract 5551, Harris County, Texas | 24.8% |
| 482015552001 | Block Group 1, Census Tract 5552, Harris County, Texas | 48.2% |
| 482015552002 | Block Group 2, Census Tract 5552, Harris County, Texas | 31.2% |
| 482015553011 | Block Group 1, Census Tract 5553.01, Harris County, Texas | 5.0% |
| 482015553021 | Block Group 1, Census Tract 5553.02, Harris County, Texas | 12.3% |
| 482015553022 | Block Group 2, Census Tract 5553.02, Harris County, Texas | 20.8% |
| 482015553031 | Block Group 1, Census Tract 5553.03, Harris County, Texas | 25.2% |
| 482015554011 | Block Group 1, Census Tract 5554.01, Harris County, Texas | 42.3% |
| 482015554021 | Block Group 1, Census Tract 5554.02, Harris County, Texas | 42.5% |
| 482015554022 | Block Group 2, Census Tract 5554.02, Harris County, Texas | 70.6% |
| 482015554023 | Block Group 3, Census Tract 5554.02, Harris County, Texas | 20.2% |
| 482015554024 | Block Group 4, Census Tract 5554.02, Harris County, Texas | 57.5% |
| 482015555011 | Block Group 1, Census Tract 5555.01, Harris County, Texas | 38.4% |
| 482015555012 | Block Group 2, Census Tract 5555.01, Harris County, Texas | 26.8% |
| 482015555021 | Block Group 1, Census Tract 5555.02, Harris County, Texas | 24.5% |
| 482015555022 | Block Group 2, Census Tract 5555.02, Harris County, Texas | 16.2% |
| 482015556001 | Block Group 1, Census Tract 5556, Harris County, Texas | 33.4% |
| 482015556002 | Block Group 2, Census Tract 5556, Harris County, Texas | 14.6% |
| 482015557011 | Block Group 1, Census Tract 5557.01, Harris County, Texas | 14.6% |
| 482015557012 | Block Group 2, Census Tract 5557.01, Harris County, Texas | 9.5% |
| 482015557021 | Block Group 1, Census Tract 5557.02, Harris County, Texas | 7.5% |
| 482015560001 | Block Group 1, Census Tract 5560, Harris County, Texas | 36.5% |
| 482015560002 | Block Group 2, Census Tract 5560, Harris County, Texas | 34.4% |
| 482015560003 | Block Group 3, Census Tract 5560, Harris County, Texas | 54.1% |
| 482019800001 | Block Group 1, Census Tract 9800, Harris County, Texas | 50.0% |
| 482019801001 | Block Group 1, Census Tract 9801, Harris County, Texas | 100.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482399501001 | Block Group 1, Census Tract 9501, Jackson County, Texas | 34.3% |
| 482399501002 | Block Group 2, Census Tract 9501, Jackson County, Texas | 44.0% |
| 482399501003 | Block Group 3, Census Tract 9501, Jackson County, Texas | 43.0% |
| 482399501004 | Block Group 4, Census Tract 9501, Jackson County, Texas | 21.4% |
| 482399502001 | Block Group 1, Census Tract 9502, Jackson County, Texas | 45.8% |
| 482399502002 | Block Group 2, Census Tract 9502, Jackson County, Texas | 46.3% |
| 482399502003 | Block Group 3, Census Tract 9502, Jackson County, Texas | 28.5% |
| 482399503001 | Block Group 1, Census Tract 9503, Jackson County, Texas | 48.1% |
| 482399503002 | Block Group 2, Census Tract 9503, Jackson County, Texas | 29.1% |
| 482399503003 | Block Group 3, Census Tract 9503, Jackson County, Texas | 36.4% |
| 482399503004 | Block Group 4, Census Tract 9503, Jackson County, Texas | 43.1% |
| 482419501001 | Block Group 1, Census Tract 9501, Jasper County, Texas | 41.2% |
| 482419501002 | Block Group 2, Census Tract 9501, Jasper County, Texas | 32.9% |
| 482419501003 | Block Group 3, Census Tract 9501, Jasper County, Texas | 38.5% |
| 482419501004 | Block Group 4, Census Tract 9501, Jasper County, Texas | 44.2% |
| 482419502001 | Block Group 1, Census Tract 9502, Jasper County, Texas | 88.4% |
| 482419502002 | Block Group 2, Census Tract 9502, Jasper County, Texas | 23.5% |
| 482419502003 | Block Group 3, Census Tract 9502, Jasper County, Texas | 60.2% |
| 482419502004 | Block Group 4, Census Tract 9502, Jasper County, Texas | 50.8% |
| 482419503001 | Block Group 1, Census Tract 9503, Jasper County, Texas | 75.4% |
| 482419503002 | Block Group 2, Census Tract 9503, Jasper County, Texas | 62.7% |
| 482419503003 | Block Group 3, Census Tract 9503, Jasper County, Texas | 53.1% |
| 482419504001 | Block Group 1, Census Tract 9504, Jasper County, Texas | 44.4% |
| 482419504002 | Block Group 2, Census Tract 9504, Jasper County, Texas | 28.8% |
| 482419504003 | Block Group 3, Census Tract 9504, Jasper County, Texas | 25.6% |
| 482419505001 | Block Group 1, Census Tract 9505, Jasper County, Texas | 42.5% |
| 482419505002 | Block Group 2, Census Tract 9505, Jasper County, Texas | 55.2% |
| 482419505003 | Block Group 3, Census Tract 9505, Jasper County, Texas | 43.5% |
| 482419505004 | Block Group 4, Census Tract 9505, Jasper County, Texas | 30.4% |
| 482419506001 | Block Group 1, Census Tract 9506, Jasper County, Texas | 29.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482419506002 | Block Group 2, Census Tract 9506, Jasper County, Texas | 65.3% |
| 482419507001 | Block Group 1, Census Tract 9507, Jasper County, Texas | 42.3% |
| 482419507002 | Block Group 2, Census Tract 9507, Jasper County, Texas | 18.9% |
| 482419507003 | Block Group 3, Census Tract 9507, Jasper County, Texas | 24.7% |
| 482419507004 | Block Group 4, Census Tract 9507, Jasper County, Texas | 21.2% |
| 482419507005 | Block Group 5, Census Tract 9507, Jasper County, Texas | 34.1% |
| 482419508001 | Block Group 1, Census Tract 9508, Jasper County, Texas | 28.9% |
| 482419508002 | Block Group 2, Census Tract 9508, Jasper County, Texas | 42.4% |
| 482450001011 | Block Group 1, Census Tract 1.01, Jefferson County, Texas | 46.2% |
| 482450001012 | Block Group 2, Census Tract 1.01, Jefferson County, Texas | 23.2% |
| 482450001021 | Block Group 1, Census Tract 1.02, Jefferson County, Texas | 34.9% |
| 482450001031 | Block Group 1, Census Tract 1.03, Jefferson County, Texas | 65.9% |
| 482450001032 | Block Group 2, Census Tract 1.03, Jefferson County, Texas | 84.5% |
| 482450002001 | Block Group 1, Census Tract 2, Jefferson County, Texas | 21.3% |
| 482450002002 | Block Group 2, Census Tract 2, Jefferson County, Texas | 40.1% |
| 482450002003 | Block Group 3, Census Tract 2, Jefferson County, Texas | 55.8% |
| 482450003021 | Block Group 1, Census Tract 3.02, Jefferson County, Texas | 22.4% |
| 482450003022 | Block Group 2, Census Tract 3.02, Jefferson County, Texas | 12.8% |
| 482450003023 | Block Group 3, Census Tract 3.02, Jefferson County, Texas | 13.9% |
| 482450003041 | Block Group 1, Census Tract 3.04, Jefferson County, Texas | 30.8% |
| 482450003042 | Block Group 2, Census Tract 3.04, Jefferson County, Texas | 30.8% |
| 482450003043 | Block Group 3, Census Tract 3.04, Jefferson County, Texas | 36.9% |
| 482450003044 | Block Group 4, Census Tract 3.04, Jefferson County, Texas | 23.0% |
| 482450003045 | Block Group 5, Census Tract 3.04, Jefferson County, Texas | 14.8% |
| 482450003061 | Block Group 1, Census Tract 3.06, Jefferson County, Texas | 7.9% |
| 482450003062 | Block Group 2, Census Tract 3.06, Jefferson County, Texas | 21.9% |
| 482450003063 | Block Group 3, Census Tract 3.06, Jefferson County, Texas | 37.7% |
| 482450003064 | Block Group 4, Census Tract 3.06, Jefferson County, Texas | 7.5% |
| 482450003071 | Block Group 1, Census Tract 3.07, Jefferson County, Texas | 24.5% |
| 482450003081 | Block Group 1, Census Tract 3.08, Jefferson County, Texas | 20.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482450003082 | Block Group 2, Census Tract 3.08, Jefferson County, Texas | 47.6% |
| 482450003083 | Block Group 3, Census Tract 3.08, Jefferson County, Texas | 68.5% |
| 482450003091 | Block Group 1, Census Tract 3.09, Jefferson County, Texas | 35.4% |
| 482450003101 | Block Group 1, Census Tract 3.10, Jefferson County, Texas | 14.3% |
| 482450003102 | Block Group 2, Census Tract 3.10, Jefferson County, Texas | 31.4% |
| 482450003103 | Block Group 3, Census Tract 3.10, Jefferson County, Texas | 47.1% |
| 482450003104 | Block Group 4, Census Tract 3.10, Jefferson County, Texas | 4.4% |
| 482450003105 | Block Group 5, Census Tract 3.10, Jefferson County, Texas | 9.8% |
| 482450004001 | Block Group 1, Census Tract 4, Jefferson County, Texas | 73.2% |
| 482450004002 | Block Group 2, Census Tract 4, Jefferson County, Texas | 85.5% |
| 482450004003 | Block Group 3, Census Tract 4, Jefferson County, Texas | 13.8% |
| 482450004004 | Block Group 4, Census Tract 4, Jefferson County, Texas | 22.9% |
| 482450005001 | Block Group 1, Census Tract 5, Jefferson County, Texas | 40.1% |
| 482450005002 | Block Group 2, Census Tract 5, Jefferson County, Texas | 47.4% |
| 482450006001 | Block Group 1, Census Tract 6, Jefferson County, Texas | 35.5% |
| 482450006002 | Block Group 2, Census Tract 6, Jefferson County, Texas | 87.6% |
| 482450006003 | Block Group 3, Census Tract 6, Jefferson County, Texas | 77.3% |
| 482450006004 | Block Group 4, Census Tract 6, Jefferson County, Texas | 57.5% |
| 482450006005 | Block Group 5, Census Tract 6, Jefferson County, Texas | 48.5% |
| 482450006006 | Block Group 6, Census Tract 6, Jefferson County, Texas | 67.5% |
| 482450007001 | Block Group 1, Census Tract 7, Jefferson County, Texas | 55.3% |
| 482450007002 | Block Group 2, Census Tract 7, Jefferson County, Texas | 100.0% |
| 482450007003 | Block Group 3, Census Tract 7, Jefferson County, Texas | 85.9% |
| 482450007004 | Block Group 4, Census Tract 7, Jefferson County, Texas | 89.2% |
| 482450009001 | Block Group 1, Census Tract 9, Jefferson County, Texas | 53.1% |
| 482450009002 | Block Group 2, Census Tract 9, Jefferson County, Texas | 67.2% |
| 482450011001 | Block Group 1, Census Tract 11, Jefferson County, Texas | 61.4% |
| 482450011002 | Block Group 2, Census Tract 11, Jefferson County, Texas | 58.2% |
| 482450011003 | Block Group 3, Census Tract 11, Jefferson County, Texas | 35.1% |
| 482450012001 | Block Group 1, Census Tract 12, Jefferson County, Texas | 57.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482450012002 | Block Group 2, Census Tract 12, Jefferson County, Texas | 70.4% |
| 482450013011 | Block Group 1, Census Tract 13.01, Jefferson County, Texas | 39.6% |
| 482450013012 | Block Group 2, Census Tract 13.01, Jefferson County, Texas | 37.1% |
| 482450013013 | Block Group 3, Census Tract 13.01, Jefferson County, Texas | 18.6% |
| 482450013014 | Block Group 4, Census Tract 13.01, Jefferson County, Texas | 18.0% |
| 482450013021 | Block Group 1, Census Tract 13.02, Jefferson County, Texas | 55.6% |
| 482450013022 | Block Group 2, Census Tract 13.02, Jefferson County, Texas | 17.6% |
| 482450013031 | Block Group 1, Census Tract 13.03, Jefferson County, Texas | 12.3% |
| 482450013032 | Block Group 2, Census Tract 13.03, Jefferson County, Texas | 32.1% |
| 482450017001 | Block Group 1, Census Tract 17, Jefferson County, Texas | 58.7% |
| 482450017002 | Block Group 2, Census Tract 17, Jefferson County, Texas | 70.3% |
| 482450017003 | Block Group 3, Census Tract 17, Jefferson County, Texas | 85.4% |
| 482450019001 | Block Group 1, Census Tract 19, Jefferson County, Texas | 63.0% |
| 482450019002 | Block Group 2, Census Tract 19, Jefferson County, Texas | 81.5% |
| 482450019003 | Block Group 3, Census Tract 19, Jefferson County, Texas | 64.8% |
| 482450020001 | Block Group 1, Census Tract 20, Jefferson County, Texas | 38.1% |
| 482450020002 | Block Group 2, Census Tract 20, Jefferson County, Texas | 50.4% |
| 482450021001 | Block Group 1, Census Tract 21, Jefferson County, Texas | 79.4% |
| 482450021002 | Block Group 2, Census Tract 21, Jefferson County, Texas | 52.8% |
| 482450021003 | Block Group 3, Census Tract 21, Jefferson County, Texas | 56.5% |
| 482450022001 | Block Group 1, Census Tract 22, Jefferson County, Texas | 63.5% |
| 482450022002 | Block Group 2, Census Tract 22, Jefferson County, Texas | 47.8% |
| 482450022003 | Block Group 3, Census Tract 22, Jefferson County, Texas | 47.1% |
| 482450023001 | Block Group 1, Census Tract 23, Jefferson County, Texas | 86.7% |
| 482450023002 | Block Group 2, Census Tract 23, Jefferson County, Texas | 82.4% |
| 482450023003 | Block Group 3, Census Tract 23, Jefferson County, Texas | 30.0% |
| 482450023004 | Block Group 4, Census Tract 23, Jefferson County, Texas | 72.0% |
| 482450023005 | Block Group 5, Census Tract 23, Jefferson County, Texas | 52.1% |
| 482450024001 | Block Group 1, Census Tract 24, Jefferson County, Texas | 95.9% |
| 482450024002 | Block Group 2, Census Tract 24, Jefferson County, Texas | 72.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482450024003 | Block Group 3, Census Tract 24, Jefferson County, Texas | 65.8% |
| 482450024004 | Block Group 4, Census Tract 24, Jefferson County, Texas | 41.0% |
| 482450025001 | Block Group 1, Census Tract 25, Jefferson County, Texas | 59.9% |
| 482450025002 | Block Group 2, Census Tract 25, Jefferson County, Texas | 59.1% |
| 482450026001 | Block Group 1, Census Tract 26, Jefferson County, Texas | 74.8% |
| 482450026002 | Block Group 2, Census Tract 26, Jefferson County, Texas | 96.5% |
| 482450026003 | Block Group 3, Census Tract 26, Jefferson County, Texas | 83.1% |
| 482450026004 | Block Group 4, Census Tract 26, Jefferson County, Texas | 64.9% |
| 482450026005 | Block Group 5, Census Tract 26, Jefferson County, Texas | 67.5% |
| 482450051001 | Block Group 1, Census Tract 51, Jefferson County, Texas | 75.0% |
| 482450051002 | Block Group 2, Census Tract 51, Jefferson County, Texas | 72.7% |
| 482450054001 | Block Group 1, Census Tract 54, Jefferson County, Texas | 77.4% |
| 482450054002 | Block Group 2, Census Tract 54, Jefferson County, Texas | 51.8% |
| 482450055001 | Block Group 1, Census Tract 55, Jefferson County, Texas | 64.9% |
| 482450055002 | Block Group 2, Census Tract 55, Jefferson County, Texas | 40.9% |
| 482450055003 | Block Group 3, Census Tract 55, Jefferson County, Texas | 36.7% |
| 482450055004 | Block Group 4, Census Tract 55, Jefferson County, Texas | 75.3% |
| 482450056001 | Block Group 1, Census Tract 56, Jefferson County, Texas | 50.8% |
| 482450056002 | Block Group 2, Census Tract 56, Jefferson County, Texas | 65.5% |
| 482450056003 | Block Group 3, Census Tract 56, Jefferson County, Texas | 53.6% |
| 482450056004 | Block Group 4, Census Tract 56, Jefferson County, Texas | 86.7% |
| 482450059001 | Block Group 1, Census Tract 59, Jefferson County, Texas | 50.3% |
| 482450059002 | Block Group 2, Census Tract 59, Jefferson County, Texas | 78.7% |
| 482450061001 | Block Group 1, Census Tract 61, Jefferson County, Texas | 64.5% |
| 482450061002 | Block Group 2, Census Tract 61, Jefferson County, Texas | 56.5% |
| 482450061003 | Block Group 3, Census Tract 61, Jefferson County, Texas | 59.5% |
| 482450063001 | Block Group 1, Census Tract 63, Jefferson County, Texas | 72.7% |
| 482450063002 | Block Group 2, Census Tract 63, Jefferson County, Texas | 50.9% |
| 482450064001 | Block Group 1, Census Tract 64, Jefferson County, Texas | 59.1% |
| 482450064002 | Block Group 2, Census Tract 64, Jefferson County, Texas | 49.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482450065001 | Block Group 1, Census Tract 65, Jefferson County, Texas | 57.8% |
| 482450065002 | Block Group 2, Census Tract 65, Jefferson County, Texas | 52.3% |
| 482450065003 | Block Group 3, Census Tract 65, Jefferson County, Texas | 82.8% |
| 482450065004 | Block Group 4, Census Tract 65, Jefferson County, Texas | 46.4% |
| 482450066001 | Block Group 1, Census Tract 66, Jefferson County, Texas | 26.7% |
| 482450066002 | Block Group 2, Census Tract 66, Jefferson County, Texas | 55.8% |
| 482450066003 | Block Group 3, Census Tract 66, Jefferson County, Texas | 58.7% |
| 482450067001 | Block Group 1, Census Tract 67, Jefferson County, Texas | 60.1% |
| 482450067002 | Block Group 2, Census Tract 67, Jefferson County, Texas | 49.4% |
| 482450068001 | Block Group 1, Census Tract 68, Jefferson County, Texas | 54.8% |
| 482450068002 | Block Group 2, Census Tract 68, Jefferson County, Texas | 56.4% |
| 482450069001 | Block Group 1, Census Tract 69, Jefferson County, Texas | 18.3% |
| 482450069002 | Block Group 2, Census Tract 69, Jefferson County, Texas | 37.5% |
| 482450069003 | Block Group 3, Census Tract 69, Jefferson County, Texas | 43.0% |
| 482450070011 | Block Group 1, Census Tract 70.01, Jefferson County, Texas | 56.5% |
| 482450070012 | Block Group 2, Census Tract 70.01, Jefferson County, Texas | 5.6% |
| 482450070013 | Block Group 3, Census Tract 70.01, Jefferson County, Texas | 70.6% |
| 482450070021 | Block Group 1, Census Tract 70.02, Jefferson County, Texas | 24.8% |
| 482450070022 | Block Group 2, Census Tract 70.02, Jefferson County, Texas | 51.6% |
| 482450071001 | Block Group 1, Census Tract 71, Jefferson County, Texas | 45.9% |
| 482450071002 | Block Group 2, Census Tract 71, Jefferson County, Texas | 29.0% |
| 482450071003 | Block Group 3, Census Tract 71, Jefferson County, Texas | 33.8% |
| 482450101001 | Block Group 1, Census Tract 101, Jefferson County, Texas | 51.0% |
| 482450101002 | Block Group 2, Census Tract 101, Jefferson County, Texas | 69.1% |
| 482450101003 | Block Group 3, Census Tract 101, Jefferson County, Texas | 72.7% |
| 482450102001 | Block Group 1, Census Tract 102, Jefferson County, Texas | 23.2% |
| 482450102002 | Block Group 2, Census Tract 102, Jefferson County, Texas | 36.6% |
| 482450103001 | Block Group 1, Census Tract 103, Jefferson County, Texas | 43.1% |
| 482450103002 | Block Group 2, Census Tract 103, Jefferson County, Texas | 46.3% |
| 482450104001 | Block Group 1, Census Tract 104, Jefferson County, Texas | 40.7% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482450104002 | Block Group 2, Census Tract 104, Jefferson County, Texas | 41.0% |
| 482450104003 | Block Group 3, Census Tract 104, Jefferson County, Texas | 16.3% |
| 482450105001 | Block Group 1, Census Tract 105, Jefferson County, Texas | 30.9% |
| 482450105002 | Block Group 2, Census Tract 105, Jefferson County, Texas | 63.6% |
| 482450105003 | Block Group 3, Census Tract 105, Jefferson County, Texas | 25.9% |
| 482450105004 | Block Group 4, Census Tract 105, Jefferson County, Texas | 39.0% |
| 482450106001 | Block Group 1, Census Tract 106, Jefferson County, Texas | 28.5% |
| 482450106002 | Block Group 2, Census Tract 106, Jefferson County, Texas | 64.9% |
| 482450106003 | Block Group 3, Census Tract 106, Jefferson County, Texas | 4.8% |
| 482450106004 | Block Group 4, Census Tract 106, Jefferson County, Texas | 31.6% |
| 482450106005 | Block Group 5, Census Tract 106, Jefferson County, Texas | 37.3% |
| 482450107001 | Block Group 1, Census Tract 107, Jefferson County, Texas | 22.7% |
| 482450107002 | Block Group 2, Census Tract 107, Jefferson County, Texas | 36.9% |
| 482450107003 | Block Group 3, Census Tract 107, Jefferson County, Texas | 17.4% |
| 482450108001 | Block Group 1, Census Tract 108, Jefferson County, Texas | 39.0% |
| 482450108002 | Block Group 2, Census Tract 108, Jefferson County, Texas | 40.7% |
| 482450108003 | Block Group 3, Census Tract 108, Jefferson County, Texas | 38.6% |
| 482450108004 | Block Group 4, Census Tract 108, Jefferson County, Texas | 44.4% |
| 482450108005 | Block Group 5, Census Tract 108, Jefferson County, Texas | 31.7% |
| 482450109011 | Block Group 1, Census Tract 109.01, Jefferson County, Texas | 20.7% |
| 482450109012 | Block Group 2, Census Tract 109.01, Jefferson County, Texas | 19.5% |
| 482450109013 | Block Group 3, Census Tract 109.01, Jefferson County, Texas | 14.7% |
| 482450109021 | Block Group 1, Census Tract 109.02, Jefferson County, Texas | 16.1% |
| 482450109022 | Block Group 2, Census Tract 109.02, Jefferson County, Texas | 24.9% |
| 482450109023 | Block Group 3, Census Tract 109.02, Jefferson County, Texas | 14.4% |
| 482450110011 | Block Group 1, Census Tract 110.01, Jefferson County, Texas | 59.2% |
| 482450110012 | Block Group 2, Census Tract 110.01, Jefferson County, Texas | 25.6% |
| 482450110013 | Block Group 3, Census Tract 110.01, Jefferson County, Texas | 16.4% |
| 482450110014 | Block Group 4, Census Tract 110.01, Jefferson County, Texas | 44.2% |
| 482450110021 | Block Group 1, Census Tract 110.02, Jefferson County, Texas | 7.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482450110022 | Block Group 2, Census Tract 110.02, Jefferson County, Texas | 17.6% |
| 482450110023 | Block Group 3, Census Tract 110.02, Jefferson County, Texas | 23.1% |
| 482450111011 | Block Group 1, Census Tract 111.01, Jefferson County, Texas | 13.3% |
| 482450111012 | Block Group 2, Census Tract 111.01, Jefferson County, Texas | 9.3% |
| 482450111013 | Block Group 3, Census Tract 111.01, Jefferson County, Texas | 21.6% |
| 482450111014 | Block Group 4, Census Tract 111.01, Jefferson County, Texas | 36.1% |
| 482450111021 | Block Group 1, Census Tract 111.02, Jefferson County, Texas | 10.3% |
| 482450111022 | Block Group 2, Census Tract 111.02, Jefferson County, Texas | 31.6% |
| 482450111023 | Block Group 3, Census Tract 111.02, Jefferson County, Texas | 25.7% |
| 482450112011 | Block Group 1, Census Tract 112.01, Jefferson County, Texas | 13.3% |
| 482450112012 | Block Group 2, Census Tract 112.01, Jefferson County, Texas | 39.8% |
| 482450112013 | Block Group 3, Census Tract 112.01, Jefferson County, Texas | 16.9% |
| 482450112014 | Block Group 4, Census Tract 112.01, Jefferson County, Texas | 8.2% |
| 482450112015 | Block Group 5, Census Tract 112.01, Jefferson County, Texas | 22.3% |
| 482450112021 | Block Group 1, Census Tract 112.02, Jefferson County, Texas | 0.0% |
| 482450112031 | Block Group 1, Census Tract 112.03, Jefferson County, Texas | 0.0% |
| 482450113021 | Block Group 1, Census Tract 113.02, Jefferson County, Texas | 0.0% |
| 482450113031 | Block Group 1, Census Tract 113.03, Jefferson County, Texas | 26.0% |
| 482450113032 | Block Group 2, Census Tract 113.03, Jefferson County, Texas | 19.9% |
| 482450113041 | Block Group 1, Census Tract 113.04, Jefferson County, Texas | 14.0% |
| 482450113042 | Block Group 2, Census Tract 113.04, Jefferson County, Texas | 15.1% |
| 482450114001 | Block Group 1, Census Tract 114, Jefferson County, Texas | 28.4% |
| 482450114002 | Block Group 2, Census Tract 114, Jefferson County, Texas | 41.2% |
| 482450114003 | Block Group 3, Census Tract 114, Jefferson County, Texas | 17.5% |
| 482450114004 | Block Group 4, Census Tract 114, Jefferson County, Texas | 13.3% |
| 482450114005 | Block Group 5, Census Tract 114, Jefferson County, Texas | 23.4% |
| 482450115001 | Block Group 1, Census Tract 115, Jefferson County, Texas | 31.8% |
| 482450116001 | Block Group 1, Census Tract 116, Jefferson County, Texas | 22.9% |
| 482450116002 | Block Group 2, Census Tract 116, Jefferson County, Texas | 56.1% |
| 482450117001 | Block Group 1, Census Tract 117, Jefferson County, Texas | 80.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482450117002 | Block Group 2, Census Tract 117, Jefferson County, Texas | 73.8% |
| 482450118001 | Block Group 1, Census Tract 118, Jefferson County, Texas | 43.0% |
| 482450118002 | Block Group 2, Census Tract 118, Jefferson County, Texas | 58.7% |
| 482459800001 | Block Group 1, Census Tract 9800, Jefferson County, Texas | 0.0% |
| 482459900000 | Block Group 0, Census Tract 9900, Jefferson County, Texas | 0.0% |
| 482499501001 | Block Group 1, Census Tract 9501, Jim Wells County, Texas | 26.8% |
| 482499501002 | Block Group 2, Census Tract 9501, Jim Wells County, Texas | 46.5% |
| 482499501003 | Block Group 3, Census Tract 9501, Jim Wells County, Texas | 48.5% |
| 482499501004 | Block Group 4, Census Tract 9501, Jim Wells County, Texas | 42.0% |
| 482499502001 | Block Group 1, Census Tract 9502, Jim Wells County, Texas | 66.2% |
| 482499502002 | Block Group 2, Census Tract 9502, Jim Wells County, Texas | 67.2% |
| 482499502003 | Block Group 3, Census Tract 9502, Jim Wells County, Texas | 37.9% |
| 482499502004 | Block Group 4, Census Tract 9502, Jim Wells County, Texas | 24.4% |
| 482499502005 | Block Group 5, Census Tract 9502, Jim Wells County, Texas | 31.8% |
| 482499502006 | Block Group 6, Census Tract 9502, Jim Wells County, Texas | 13.8% |
| 482499503001 | Block Group 1, Census Tract 9503, Jim Wells County, Texas | 9.7% |
| 482499503002 | Block Group 2, Census Tract 9503, Jim Wells County, Texas | 18.2% |
| 482499503003 | Block Group 3, Census Tract 9503, Jim Wells County, Texas | 7.4% |
| 482499503004 | Block Group 4, Census Tract 9503, Jim Wells County, Texas | 33.2% |
| 482499503005 | Block Group 5, Census Tract 9503, Jim Wells County, Texas | 65.5% |
| 482499503006 | Block Group 6, Census Tract 9503, Jim Wells County, Texas | 35.9% |
| 482499504001 | Block Group 1, Census Tract 9504, Jim Wells County, Texas | 45.9% |
| 482499504002 | Block Group 2, Census Tract 9504, Jim Wells County, Texas | 27.9% |
| 482499504003 | Block Group 3, Census Tract 9504, Jim Wells County, Texas | 61.4% |
| 482499505001 | Block Group 1, Census Tract 9505, Jim Wells County, Texas | 51.3% |
| 482499505002 | Block Group 2, Census Tract 9505, Jim Wells County, Texas | 64.0% |
| 482499505003 | Block Group 3, Census Tract 9505, Jim Wells County, Texas | 64.0% |
| 482499505004 | Block Group 4, Census Tract 9505, Jim Wells County, Texas | 50.2% |
| 482499506001 | Block Group 1, Census Tract 9506, Jim Wells County, Texas | 39.7% |
| 482499506002 | Block Group 2, Census Tract 9506, Jim Wells County, Texas | 75.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482499506003 | Block Group 3, Census Tract 9506, Jim Wells County, Texas | 79.8% |
| 482499506004 | Block Group 4, Census Tract 9506, Jim Wells County, Texas | 31.8% |
| 482499507001 | Block Group 1, Census Tract 9507, Jim Wells County, Texas | 87.5% |
| 482499507002 | Block Group 2, Census Tract 9507, Jim Wells County, Texas | 53.8% |
| 482499507003 | Block Group 3, Census Tract 9507, Jim Wells County, Texas | 48.8% |
| 482499507004 | Block Group 4, Census Tract 9507, Jim Wells County, Texas | 49.5% |
| 482559701001 | Block Group 1, Census Tract 9701, Karnes County, Texas | 24.8% |
| 482559701002 | Block Group 2, Census Tract 9701, Karnes County, Texas | 34.7% |
| 482559702001 | Block Group 1, Census Tract 9702, Karnes County, Texas | 51.9% |
| 482559702002 | Block Group 2, Census Tract 9702, Karnes County, Texas | 36.6% |
| 482559702003 | Block Group 3, Census Tract 9702, Karnes County, Texas | 38.8% |
| 482559702004 | Block Group 4, Census Tract 9702, Karnes County, Texas | 27.6% |
| 482559703001 | Block Group 1, Census Tract 9703, Karnes County, Texas | 51.5% |
| 482559703002 | Block Group 2, Census Tract 9703, Karnes County, Texas | 31.6% |
| 482559703003 | Block Group 3, Census Tract 9703, Karnes County, Texas | 47.7% |
| 482559703004 | Block Group 4, Census Tract 9703, Karnes County, Texas | 44.8% |
| 482559703005 | Block Group 5, Census Tract 9703, Karnes County, Texas | 21.9% |
| 482559704001 | Block Group 1, Census Tract 9704, Karnes County, Texas | 53.9% |
| 482730201001 | Block Group 1, Census Tract 201, Kleberg County, Texas | 26.9% |
| 482730201002 | Block Group 2, Census Tract 201, Kleberg County, Texas | 23.3% |
| 482730202001 | Block Group 1, Census Tract 202, Kleberg County, Texas | 53.6% |
| 482730202002 | Block Group 2, Census Tract 202, Kleberg County, Texas | 65.6% |
| 482730202003 | Block Group 3, Census Tract 202, Kleberg County, Texas | 76.1% |
| 482730202004 | Block Group 4, Census Tract 202, Kleberg County, Texas | 78.9% |
| 482730202005 | Block Group 5, Census Tract 202, Kleberg County, Texas | 20.3% |
| 482730203001 | Block Group 1, Census Tract 203, Kleberg County, Texas | 81.1% |
| 482730203002 | Block Group 2, Census Tract 203, Kleberg County, Texas | 74.0% |
| 482730203003 | Block Group 3, Census Tract 203, Kleberg County, Texas | 53.6% |
| 482730203004 | Block Group 4, Census Tract 203, Kleberg County, Texas | 53.9% |
| 482730203005 | Block Group 5, Census Tract 203, Kleberg County, Texas | 45.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482730204001 | Block Group 1, Census Tract 204, Kleberg County, Texas | 86.6% |
| 482730204002 | Block Group 2, Census Tract 204, Kleberg County, Texas | 54.2% |
| 482730204003 | Block Group 3, Census Tract 204, Kleberg County, Texas | 41.6% |
| 482730204004 | Block Group 4, Census Tract 204, Kleberg County, Texas | 11.9% |
| 482730204005 | Block Group 5, Census Tract 204, Kleberg County, Texas | 48.5% |
| 482730204006 | Block Group 6, Census Tract 204, Kleberg County, Texas | 8.7% |
| 482730205001 | Block Group 1, Census Tract 205, Kleberg County, Texas | 24.2% |
| 482730205002 | Block Group 2, Census Tract 205, Kleberg County, Texas | 55.2% |
| 482730205003 | Block Group 3, Census Tract 205, Kleberg County, Texas | 50.9% |
| 482730205004 | Block Group 4, Census Tract 205, Kleberg County, Texas | 30.5% |
| 482739900000 | Block Group 0, Census Tract 9900, Kleberg County, Texas | 0.0% |
| 482850001001 | Block Group 1, Census Tract 1, Lavaca County, Texas | 48.8% |
| 482850001002 | Block Group 2, Census Tract 1, Lavaca County, Texas | 35.5% |
| 482850001003 | Block Group 3, Census Tract 1, Lavaca County, Texas | 23.7% |
| 482850002001 | Block Group 1, Census Tract 2, Lavaca County, Texas | 42.0% |
| 482850002002 | Block Group 2, Census Tract 2, Lavaca County, Texas | 46.1% |
| 482850002003 | Block Group 3, Census Tract 2, Lavaca County, Texas | 48.8% |
| 482850003001 | Block Group 1, Census Tract 3, Lavaca County, Texas | 36.1% |
| 482850003002 | Block Group 2, Census Tract 3, Lavaca County, Texas | 45.0% |
| 482850003003 | Block Group 3, Census Tract 3, Lavaca County, Texas | 42.4% |
| 482850004001 | Block Group 1, Census Tract 4, Lavaca County, Texas | 14.7% |
| 482850004002 | Block Group 2, Census Tract 4, Lavaca County, Texas | 17.1% |
| 482850004003 | Block Group 3, Census Tract 4, Lavaca County, Texas | 29.8% |
| 482850004004 | Block Group 4, Census Tract 4, Lavaca County, Texas | 47.1% |
| 482850005001 | Block Group 1, Census Tract 5, Lavaca County, Texas | 40.8% |
| 482850005002 | Block Group 2, Census Tract 5, Lavaca County, Texas | 22.3% |
| 482850006001 | Block Group 1, Census Tract 6, Lavaca County, Texas | 35.2% |
| 482850006002 | Block Group 2, Census Tract 6, Lavaca County, Texas | 43.8% |
| 482850006003 | Block Group 3, Census Tract 6, Lavaca County, Texas | 64.0% |
| 482870001001 | Block Group 1, Census Tract 1, Lee County, Texas | 29.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482870001002 | Block Group 2, Census Tract 1, Lee County, Texas | 8.8% |
| 482870001003 | Block Group 3, Census Tract 1, Lee County, Texas | 26.4% |
| 482870002001 | Block Group 1, Census Tract 2, Lee County, Texas | 41.6% |
| 482870002002 | Block Group 2, Census Tract 2, Lee County, Texas | 31.7% |
| 482870002003 | Block Group 3, Census Tract 2, Lee County, Texas | 18.1% |
| 482870003001 | Block Group 1, Census Tract 3, Lee County, Texas | 41.5% |
| 482870003002 | Block Group 2, Census Tract 3, Lee County, Texas | 31.3% |
| 482870003003 | Block Group 3, Census Tract 3, Lee County, Texas | 30.8% |
| 482870004001 | Block Group 1, Census Tract 4, Lee County, Texas | 45.3% |
| 482870004002 | Block Group 2, Census Tract 4, Lee County, Texas | 62.6% |
| 482870004003 | Block Group 3, Census Tract 4, Lee County, Texas | 61.4% |
| 482870004004 | Block Group 4, Census Tract 4, Lee County, Texas | 44.8% |
| 482917001001 | Block Group 1, Census Tract 7001, Liberty County, Texas | 79.3% |
| 482917001002 | Block Group 2, Census Tract 7001, Liberty County, Texas | 46.2% |
| 482917001003 | Block Group 3, Census Tract 7001, Liberty County, Texas | 41.5% |
| 482917002001 | Block Group 1, Census Tract 7002, Liberty County, Texas | 71.3% |
| 482917002002 | Block Group 2, Census Tract 7002, Liberty County, Texas | 53.5% |
| 482917003001 | Block Group 1, Census Tract 7003, Liberty County, Texas | 59.8% |
| 482917003002 | Block Group 2, Census Tract 7003, Liberty County, Texas | 60.0% |
| 482917003003 | Block Group 3, Census Tract 7003, Liberty County, Texas | 49.0% |
| 482917003004 | Block Group 4, Census Tract 7003, Liberty County, Texas | 17.8% |
| 482917003005 | Block Group 5, Census Tract 7003, Liberty County, Texas | 53.0% |
| 482917004001 | Block Group 1, Census Tract 7004, Liberty County, Texas | 40.7% |
| 482917004002 | Block Group 2, Census Tract 7004, Liberty County, Texas | 32.7% |
| 482917004003 | Block Group 3, Census Tract 7004, Liberty County, Texas | 37.8% |
| 482917004004 | Block Group 4, Census Tract 7004, Liberty County, Texas | 54.0% |
| 482917005001 | Block Group 1, Census Tract 7005, Liberty County, Texas | 52.5% |
| 482917005002 | Block Group 2, Census Tract 7005, Liberty County, Texas | 34.0% |
| 482917006001 | Block Group 1, Census Tract 7006, Liberty County, Texas | 57.6% |
| 482917006002 | Block Group 2, Census Tract 7006, Liberty County, Texas | 56.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482917006003 | Block Group 3, Census Tract 7006, Liberty County, Texas | 59.8% |
| 482917007001 | Block Group 1, Census Tract 7007, Liberty County, Texas | 26.7% |
| 482917007002 | Block Group 2, Census Tract 7007, Liberty County, Texas | 25.6% |
| 482917008001 | Block Group 1, Census Tract 7008, Liberty County, Texas | 22.0% |
| 482917008002 | Block Group 2, Census Tract 7008, Liberty County, Texas | 48.8% |
| 482917008003 | Block Group 3, Census Tract 7008, Liberty County, Texas | 11.8% |
| 482917008004 | Block Group 4, Census Tract 7008, Liberty County, Texas | 49.9% |
| 482917008005 | Block Group 5, Census Tract 7008, Liberty County, Texas | 43.9% |
| 482917009001 | Block Group 1, Census Tract 7009, Liberty County, Texas | 37.1% |
| 482917009002 | Block Group 2, Census Tract 7009, Liberty County, Texas | 27.9% |
| 482917009003 | Block Group 3, Census Tract 7009, Liberty County, Texas | 0.0% |
| 482917010001 | Block Group 1, Census Tract 7010, Liberty County, Texas | 37.5% |
| 482917010002 | Block Group 2, Census Tract 7010, Liberty County, Texas | 47.3% |
| 482917010003 | Block Group 3, Census Tract 7010, Liberty County, Texas | 42.0% |
| 482917011001 | Block Group 1, Census Tract 7011, Liberty County, Texas | 22.3% |
| 482917011002 | Block Group 2, Census Tract 7011, Liberty County, Texas | 42.0% |
| 482917011003 | Block Group 3, Census Tract 7011, Liberty County, Texas | 35.9% |
| 482917011004 | Block Group 4, Census Tract 7011, Liberty County, Texas | 51.1% |
| 482917012001 | Block Group 1, Census Tract 7012, Liberty County, Texas | 31.0% |
| 482917012002 | Block Group 2, Census Tract 7012, Liberty County, Texas | 72.9% |
| 482917012003 | Block Group 3, Census Tract 7012, Liberty County, Texas | 37.8% |
| 482917012004 | Block Group 4, Census Tract 7012, Liberty County, Texas | 43.4% |
| 482917012005 | Block Group 5, Census Tract 7012, Liberty County, Texas | 66.0% |
| 482917013001 | Block Group 1, Census Tract 7013, Liberty County, Texas | 51.5% |
| 482917013002 | Block Group 2, Census Tract 7013, Liberty County, Texas | 39.5% |
| 482917013003 | Block Group 3, Census Tract 7013, Liberty County, Texas | 43.2% |
| 482917013004 | Block Group 4, Census Tract 7013, Liberty County, Texas | 43.1% |
| 482917014001 | Block Group 1, Census Tract 7014, Liberty County, Texas | 26.0% |
| 482917014002 | Block Group 2, Census Tract 7014, Liberty County, Texas | 53.5% |
| 482917014003 | Block Group 3, Census Tract 7014, Liberty County, Texas | 42.3% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 482917014004 | Block Group 4, Census Tract 7014, Liberty County, Texas | 51.2% |
| 482917014005 | Block Group 5, Census Tract 7014, Liberty County, Texas | 67.2% |
| 482917014006 | Block Group 6, Census Tract 7014, Liberty County, Texas | 48.7% |
| 483130001001 | Block Group 1, Census Tract 1, Madison County, Texas | 55.7% |
| 483130001002 | Block Group 2, Census Tract 1, Madison County, Texas | 0.0% |
| 483130001003 | Block Group 3, Census Tract 1, Madison County, Texas | 31.7% |
| 483130002001 | Block Group 1, Census Tract 2, Madison County, Texas | 40.2% |
| 483130002002 | Block Group 2, Census Tract 2, Madison County, Texas | 51.9% |
| 483130003001 | Block Group 1, Census Tract 3, Madison County, Texas | 30.7% |
| 483130003002 | Block Group 2, Census Tract 3, Madison County, Texas | 34.2% |
| 483130004001 | Block Group 1, Census Tract 4, Madison County, Texas | 33.3% |
| 483130004002 | Block Group 2, Census Tract 4, Madison County, Texas | 55.9% |
| 483130004003 | Block Group 3, Census Tract 4, Madison County, Texas | 42.6% |
| 483130004004 | Block Group 4, Census Tract 4, Madison County, Texas | 49.3% |
| 483217301001 | Block Group 1, Census Tract 7301, Matagorda County, Texas | 42.1% |
| 483217301002 | Block Group 2, Census Tract 7301, Matagorda County, Texas | 95.3% |
| 483217301003 | Block Group 3, Census Tract 7301, Matagorda County, Texas | 23.1% |
| 483217302011 | Block Group 1, Census Tract 7302.01, Matagorda County, Texas | 22.2% |
| 483217302012 | Block Group 2, Census Tract 7302.01, Matagorda County, Texas | 20.5% |
| 483217302013 | Block Group 3, Census Tract 7302.01, Matagorda County, Texas | 26.9% |
| 483217302014 | Block Group 4, Census Tract 7302.01, Matagorda County, Texas | 51.7% |
| 483217302015 | Block Group 5, Census Tract 7302.01, Matagorda County, Texas | 47.2% |
| 483217302016 | Block Group 6, Census Tract 7302.01, Matagorda County, Texas | 65.1% |
| 483217302017 | Block Group 7, Census Tract 7302.01, Matagorda County, Texas | 45.6% |
| 483217302021 | Block Group 1, Census Tract 7302.02, Matagorda County, Texas | 9.7% |
| 483217303011 | Block Group 1, Census Tract 7303.01, Matagorda County, Texas | 26.7% |
| 483217303012 | Block Group 2, Census Tract 7303.01, Matagorda County, Texas | 52.4% |
| 483217303013 | Block Group 3, Census Tract 7303.01, Matagorda County, Texas | 37.0% |
| 483217303014 | Block Group 4, Census Tract 7303.01, Matagorda County, Texas | 36.0% |
| 483217303021 | Block Group 1, Census Tract 7303.02, Matagorda County, Texas | 62.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483217303022 | Block Group 2, Census Tract 7303.02, Matagorda County, Texas | 56.1% |
| 483217303023 | Block Group 3, Census Tract 7303.02, Matagorda County, Texas | 60.1% |
| 483217303031 | Block Group 1, Census Tract 7303.03, Matagorda County, Texas | 14.5% |
| 483217304001 | Block Group 1, Census Tract 7304, Matagorda County, Texas | 51.7% |
| 483217304002 | Block Group 2, Census Tract 7304, Matagorda County, Texas | 50.0% |
| 483217304003 | Block Group 3, Census Tract 7304, Matagorda County, Texas | 52.4% |
| 483217305011 | Block Group 1, Census Tract 7305.01, Matagorda County, Texas | 3.6% |
| 483217305012 | Block Group 2, Census Tract 7305.01, Matagorda County, Texas | 32.3% |
| 483217305013 | Block Group 3, Census Tract 7305.01, Matagorda County, Texas | 15.4% |
| 483217305014 | Block Group 4, Census Tract 7305.01, Matagorda County, Texas | 36.9% |
| 483217306001 | Block Group 1, Census Tract 7306, Matagorda County, Texas | 31.7% |
| 483217306002 | Block Group 2, Census Tract 7306, Matagorda County, Texas | 43.5% |
| 483217306003 | Block Group 3, Census Tract 7306, Matagorda County, Texas | 36.9% |
| 483217306004 | Block Group 4, Census Tract 7306, Matagorda County, Texas | 86.8% |
| 483217306005 | Block Group 5, Census Tract 7306, Matagorda County, Texas | 47.2% |
| 483217307001 | Block Group 1, Census Tract 7307, Matagorda County, Texas | 23.9% |
| 483217307002 | Block Group 2, Census Tract 7307, Matagorda County, Texas | 45.9% |
| 483217307003 | Block Group 3, Census Tract 7307, Matagorda County, Texas | 37.7% |
| 483217307004 | Block Group 4, Census Tract 7307, Matagorda County, Texas | 35.2% |
| 483219900000 | Block Group 0, Census Tract 9900, Matagorda County, Texas | 0.0% |
| 483319501001 | Block Group 1, Census Tract 9501, Milam County, Texas | 29.2% |
| 483319501002 | Block Group 2, Census Tract 9501, Milam County, Texas | 52.5% |
| 483319503001 | Block Group 1, Census Tract 9503, Milam County, Texas | 19.8% |
| 483319503002 | Block Group 2, Census Tract 9503, Milam County, Texas | 15.9% |
| 483319503003 | Block Group 3, Census Tract 9503, Milam County, Texas | 49.4% |
| 483319504011 | Block Group 1, Census Tract 9504.01, Milam County, Texas | 55.6% |
| 483319504012 | Block Group 2, Census Tract 9504.01, Milam County, Texas | 26.0% |
| 483319504021 | Block Group 1, Census Tract 9504.02, Milam County, Texas | 55.6% |
| 483319504022 | Block Group 2, Census Tract 9504.02, Milam County, Texas | 56.3% |
| 483319505001 | Block Group 1, Census Tract 9505, Milam County, Texas | 47.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483319505002 | Block Group 2, Census Tract 9505, Milam County, Texas | 40.1% |
| 483319505003 | Block Group 3, Census Tract 9505, Milam County, Texas | 42.5% |
| 483319507001 | Block Group 1, Census Tract 9507, Milam County, Texas | 48.6% |
| 483319507002 | Block Group 2, Census Tract 9507, Milam County, Texas | 76.4% |
| 483319507003 | Block Group 3, Census Tract 9507, Milam County, Texas | 56.5% |
| 483319507004 | Block Group 4, Census Tract 9507, Milam County, Texas | 66.5% |
| 483319507005 | Block Group 5, Census Tract 9507, Milam County, Texas | 24.7% |
| 483319507006 | Block Group 6, Census Tract 9507, Milam County, Texas | 48.9% |
| 483319508001 | Block Group 1, Census Tract 9508, Milam County, Texas | 35.9% |
| 483319508002 | Block Group 2, Census Tract 9508, Milam County, Texas | 32.0% |
| 483396901001 | Block Group 1, Census Tract 6901, Montgomery County, Texas | 9.8% |
| 483396901002 | Block Group 2, Census Tract 6901, Montgomery County, Texas | 53.9% |
| 483396901003 | Block Group 3, Census Tract 6901, Montgomery County, Texas | 29.9% |
| 483396901004 | Block Group 4, Census Tract 6901, Montgomery County, Texas | 53.2% |
| 483396902011 | Block Group 1, Census Tract 6902.01, Montgomery County, Texas | 14.4% |
| 483396902012 | Block Group 2, Census Tract 6902.01, Montgomery County, Texas | 42.0% |
| 483396902013 | Block Group 3, Census Tract 6902.01, Montgomery County, Texas | 20.1% |
| 483396902014 | Block Group 4, Census Tract 6902.01, Montgomery County, Texas | 28.9% |
| 483396902021 | Block Group 1, Census Tract 6902.02, Montgomery County, Texas | 42.9% |
| 483396902022 | Block Group 2, Census Tract 6902.02, Montgomery County, Texas | 5.9% |
| 483396902023 | Block Group 3, Census Tract 6902.02, Montgomery County, Texas | 71.5% |
| 483396902024 | Block Group 4, Census Tract 6902.02, Montgomery County, Texas | 69.5% |
| 483396902025 | Block Group 5, Census Tract 6902.02, Montgomery County, Texas | 39.7% |
| 483396903001 | Block Group 1, Census Tract 6903, Montgomery County, Texas | 61.7% |
| 483396903002 | Block Group 2, Census Tract 6903, Montgomery County, Texas | 34.8% |
| 483396903003 | Block Group 3, Census Tract 6903, Montgomery County, Texas | 26.1% |
| 483396904011 | Block Group 1, Census Tract 6904.01, Montgomery County, Texas | 20.4% |
| 483396904012 | Block Group 2, Census Tract 6904.01, Montgomery County, Texas | 14.1% |
| 483396904021 | Block Group 1, Census Tract 6904.02, Montgomery County, Texas | 14.8% |
| 483396904022 | Block Group 2, Census Tract 6904.02, Montgomery County, Texas | 40.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483396904023 | Block Group 3, Census Tract 6904.02, Montgomery County, Texas | 12.2% |
| 483396904024 | Block Group 4, Census Tract 6904.02, Montgomery County, Texas | 12.8% |
| 483396904025 | Block Group 5, Census Tract 6904.02, Montgomery County, Texas | 65.7% |
| 483396905001 | Block Group 1, Census Tract 6905, Montgomery County, Texas | 14.8% |
| 483396905002 | Block Group 2, Census Tract 6905, Montgomery County, Texas | 8.7% |
| 483396906011 | Block Group 1, Census Tract 6906.01, Montgomery County, Texas | 12.5% |
| 483396906012 | Block Group 2, Census Tract 6906.01, Montgomery County, Texas | 10.3% |
| 483396906013 | Block Group 3, Census Tract 6906.01, Montgomery County, Texas | 14.1% |
| 483396906014 | Block Group 4, Census Tract 6906.01, Montgomery County, Texas | 18.2% |
| 483396906015 | Block Group 5, Census Tract 6906.01, Montgomery County, Texas | 17.5% |
| 483396906016 | Block Group 6, Census Tract 6906.01, Montgomery County, Texas | 3.7% |
| 483396906021 | Block Group 1, Census Tract 6906.02, Montgomery County, Texas | 7.9% |
| 483396906022 | Block Group 2, Census Tract 6906.02, Montgomery County, Texas | 17.6% |
| 483396906023 | Block Group 3, Census Tract 6906.02, Montgomery County, Texas | 1.4% |
| 483396906024 | Block Group 4, Census Tract 6906.02, Montgomery County, Texas | 17.6% |
| 483396907001 | Block Group 1, Census Tract 6907, Montgomery County, Texas | 12.2% |
| 483396907002 | Block Group 2, Census Tract 6907, Montgomery County, Texas | 29.8% |
| 483396908001 | Block Group 1, Census Tract 6908, Montgomery County, Texas | 4.9% |
| 483396908002 | Block Group 2, Census Tract 6908, Montgomery County, Texas | 11.6% |
| 483396909001 | Block Group 1, Census Tract 6909, Montgomery County, Texas | 9.8% |
| 483396909002 | Block Group 2, Census Tract 6909, Montgomery County, Texas | 5.1% |
| 483396910001 | Block Group 1, Census Tract 6910, Montgomery County, Texas | 7.1% |
| 483396910002 | Block Group 2, Census Tract 6910, Montgomery County, Texas | 5.0% |
| 483396911001 | Block Group 1, Census Tract 6911, Montgomery County, Texas | 17.7% |
| 483396911002 | Block Group 2, Census Tract 6911, Montgomery County, Texas | 23.4% |
| 483396912001 | Block Group 1, Census Tract 6912, Montgomery County, Texas | 14.5% |
| 483396912002 | Block Group 2, Census Tract 6912, Montgomery County, Texas | 46.1% |
| 483396912003 | Block Group 3, Census Tract 6912, Montgomery County, Texas | 3.4% |
| 483396913011 | Block Group 1, Census Tract 6913.01, Montgomery County, Texas | 16.3% |
| 483396913012 | Block Group 2, Census Tract 6913.01, Montgomery County, Texas | 7.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483396913021 | Block Group 1, Census Tract 6913.02, Montgomery County, Texas | 44.9% |
| 483396913022 | Block Group 2, Census Tract 6913.02, Montgomery County, Texas | 37.7% |
| 483396914001 | Block Group 1, Census Tract 6914, Montgomery County, Texas | 32.3% |
| 483396914002 | Block Group 2, Census Tract 6914, Montgomery County, Texas | 31.0% |
| 483396914003 | Block Group 3, Census Tract 6914, Montgomery County, Texas | 47.7% |
| 483396915001 | Block Group 1, Census Tract 6915, Montgomery County, Texas | 10.2% |
| 483396915002 | Block Group 2, Census Tract 6915, Montgomery County, Texas | 20.2% |
| 483396915003 | Block Group 3, Census Tract 6915, Montgomery County, Texas | 20.1% |
| 483396915004 | Block Group 4, Census Tract 6915, Montgomery County, Texas | 67.0% |
| 483396916011 | Block Group 1, Census Tract 6916.01, Montgomery County, Texas | 31.9% |
| 483396916012 | Block Group 2, Census Tract 6916.01, Montgomery County, Texas | 6.0% |
| 483396916021 | Block Group 1, Census Tract 6916.02, Montgomery County, Texas | 40.5% |
| 483396916022 | Block Group 2, Census Tract 6916.02, Montgomery County, Texas | 25.6% |
| 483396917001 | Block Group 1, Census Tract 6917, Montgomery County, Texas | 36.9% |
| 483396918001 | Block Group 1, Census Tract 6918, Montgomery County, Texas | 28.8% |
| 483396918002 | Block Group 2, Census Tract 6918, Montgomery County, Texas | 23.9% |
| 483396918003 | Block Group 3, Census Tract 6918, Montgomery County, Texas | 13.3% |
| 483396918004 | Block Group 4, Census Tract 6918, Montgomery County, Texas | 22.3% |
| 483396918005 | Block Group 5, Census Tract 6918, Montgomery County, Texas | 64.5% |
| 483396919001 | Block Group 1, Census Tract 6919, Montgomery County, Texas | 7.3% |
| 483396919002 | Block Group 2, Census Tract 6919, Montgomery County, Texas | 39.8% |
| 483396919003 | Block Group 3, Census Tract 6919, Montgomery County, Texas | 20.7% |
| 483396920011 | Block Group 1, Census Tract 6920.01, Montgomery County, Texas | 11.4% |
| 483396920012 | Block Group 2, Census Tract 6920.01, Montgomery County, Texas | 17.4% |
| 483396920013 | Block Group 3, Census Tract 6920.01, Montgomery County, Texas | 30.7% |
| 483396920014 | Block Group 4, Census Tract 6920.01, Montgomery County, Texas | 20.1% |
| 483396920015 | Block Group 5, Census Tract 6920.01, Montgomery County, Texas | 20.0% |
| 483396920016 | Block Group 6, Census Tract 6920.01, Montgomery County, Texas | 20.2% |
| 483396920021 | Block Group 1, Census Tract 6920.02, Montgomery County, Texas | 1.0% |
| 483396920022 | Block Group 2, Census Tract 6920.02, Montgomery County, Texas | 10.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483396921001 | Block Group 1, Census Tract 6921, Montgomery County, Texas | 46.9% |
| 483396921002 | Block Group 2, Census Tract 6921, Montgomery County, Texas | 17.5% |
| 483396921003 | Block Group 3, Census Tract 6921, Montgomery County, Texas | 5.3% |
| 483396922001 | Block Group 1, Census Tract 6922, Montgomery County, Texas | 51.4% |
| 483396922002 | Block Group 2, Census Tract 6922, Montgomery County, Texas | 29.2% |
| 483396922003 | Block Group 3, Census Tract 6922, Montgomery County, Texas | 60.2% |
| 483396922004 | Block Group 4, Census Tract 6922, Montgomery County, Texas | 21.7% |
| 483396923001 | Block Group 1, Census Tract 6923, Montgomery County, Texas | 59.4% |
| 483396923002 | Block Group 2, Census Tract 6923, Montgomery County, Texas | 67.1% |
| 483396923003 | Block Group 3, Census Tract 6923, Montgomery County, Texas | 14.3% |
| 483396923004 | Block Group 4, Census Tract 6923, Montgomery County, Texas | 18.5% |
| 483396923005 | Block Group 5, Census Tract 6923, Montgomery County, Texas | 24.4% |
| 483396924001 | Block Group 1, Census Tract 6924, Montgomery County, Texas | 42.7% |
| 483396924002 | Block Group 2, Census Tract 6924, Montgomery County, Texas | 45.3% |
| 483396924003 | Block Group 3, Census Tract 6924, Montgomery County, Texas | 39.3% |
| 483396925001 | Block Group 1, Census Tract 6925, Montgomery County, Texas | 48.9% |
| 483396925002 | Block Group 2, Census Tract 6925, Montgomery County, Texas | 31.1% |
| 483396925003 | Block Group 3, Census Tract 6925, Montgomery County, Texas | 46.8% |
| 483396925004 | Block Group 4, Census Tract 6925, Montgomery County, Texas | 51.3% |
| 483396926011 | Block Group 1, Census Tract 6926.01, Montgomery County, Texas | 42.7% |
| 483396926012 | Block Group 2, Census Tract 6926.01, Montgomery County, Texas | 73.6% |
| 483396926021 | Block Group 1, Census Tract 6926.02, Montgomery County, Texas | 62.1% |
| 483396926022 | Block Group 2, Census Tract 6926.02, Montgomery County, Texas | 47.3% |
| 483396926023 | Block Group 3, Census Tract 6926.02, Montgomery County, Texas | 54.4% |
| 483396927001 | Block Group 1, Census Tract 6927, Montgomery County, Texas | 43.3% |
| 483396927002 | Block Group 2, Census Tract 6927, Montgomery County, Texas | 31.7% |
| 483396927003 | Block Group 3, Census Tract 6927, Montgomery County, Texas | 31.9% |
| 483396928011 | Block Group 1, Census Tract 6928.01, Montgomery County, Texas | 28.2% |
| 483396928012 | Block Group 2, Census Tract 6928.01, Montgomery County, Texas | 38.0% |
| 483396928013 | Block Group 3, Census Tract 6928.01, Montgomery County, Texas | 64.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483396928014 | Block Group 4, Census Tract 6928.01, Montgomery County, Texas | 44.4% |
| 483396928021 | Block Group 1, Census Tract 6928.02, Montgomery County, Texas | 57.0% |
| 483396928022 | Block Group 2, Census Tract 6928.02, Montgomery County, Texas | 37.2% |
| 483396928023 | Block Group 3, Census Tract 6928.02, Montgomery County, Texas | 21.4% |
| 483396929001 | Block Group 1, Census Tract 6929, Montgomery County, Texas | 58.1% |
| 483396929002 | Block Group 2, Census Tract 6929, Montgomery County, Texas | 32.1% |
| 483396930001 | Block Group 1, Census Tract 6930, Montgomery County, Texas | 62.1% |
| 483396930002 | Block Group 2, Census Tract 6930, Montgomery County, Texas | 61.5% |
| 483396930003 | Block Group 3, Census Tract 6930, Montgomery County, Texas | 74.8% |
| 483396930004 | Block Group 4, Census Tract 6930, Montgomery County, Texas | 63.2% |
| 483396931011 | Block Group 1, Census Tract 6931.01, Montgomery County, Texas | 100.0% |
| 483396931012 | Block Group 2, Census Tract 6931.01, Montgomery County, Texas | 88.4% |
| 483396931013 | Block Group 3, Census Tract 6931.01, Montgomery County, Texas | 50.3% |
| 483396931014 | Block Group 4, Census Tract 6931.01, Montgomery County, Texas | 71.5% |
| 483396931021 | Block Group 1, Census Tract 6931.02, Montgomery County, Texas | 55.1% |
| 483396931022 | Block Group 2, Census Tract 6931.02, Montgomery County, Texas | 58.3% |
| 483396932001 | Block Group 1, Census Tract 6932, Montgomery County, Texas | 32.1% |
| 483396932002 | Block Group 2, Census Tract 6932, Montgomery County, Texas | 11.8% |
| 483396932003 | Block Group 3, Census Tract 6932, Montgomery County, Texas | 33.6% |
| 483396932004 | Block Group 4, Census Tract 6932, Montgomery County, Texas | 10.6% |
| 483396933001 | Block Group 1, Census Tract 6933, Montgomery County, Texas | 74.6% |
| 483396933002 | Block Group 2, Census Tract 6933, Montgomery County, Texas | 25.7% |
| 483396933003 | Block Group 3, Census Tract 6933, Montgomery County, Texas | 38.8% |
| 483396934001 | Block Group 1, Census Tract 6934, Montgomery County, Texas | 79.6% |
| 483396934002 | Block Group 2, Census Tract 6934, Montgomery County, Texas | 67.7% |
| 483396934003 | Block Group 3, Census Tract 6934, Montgomery County, Texas | 95.7% |
| 483396935001 | Block Group 1, Census Tract 6935, Montgomery County, Texas | 45.8% |
| 483396935002 | Block Group 2, Census Tract 6935, Montgomery County, Texas | 60.9% |
| 483396935003 | Block Group 3, Census Tract 6935, Montgomery County, Texas | 74.4% |
| 483396935004 | Block Group 4, Census Tract 6935, Montgomery County, Texas | 68.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483396936001 | Block Group 1, Census Tract 6936, Montgomery County, Texas | 40.3% |
| 483396936002 | Block Group 2, Census Tract 6936, Montgomery County, Texas | 40.9% |
| 483396937001 | Block Group 1, Census Tract 6937, Montgomery County, Texas | 35.9% |
| 483396937002 | Block Group 2, Census Tract 6937, Montgomery County, Texas | 20.9% |
| 483396938001 | Block Group 1, Census Tract 6938, Montgomery County, Texas | 60.3% |
| 483396939001 | Block Group 1, Census Tract 6939, Montgomery County, Texas | 79.9% |
| 483396939002 | Block Group 2, Census Tract 6939, Montgomery County, Texas | 78.9% |
| 483396939003 | Block Group 3, Census Tract 6939, Montgomery County, Texas | 45.4% |
| 483396939004 | Block Group 4, Census Tract 6939, Montgomery County, Texas | 71.4% |
| 483396939005 | Block Group 5, Census Tract 6939, Montgomery County, Texas | 48.4% |
| 483396939006 | Block Group 6, Census Tract 6939, Montgomery County, Texas | 87.8% |
| 483396940001 | Block Group 1, Census Tract 6940, Montgomery County, Texas | 38.3% |
| 483396940002 | Block Group 2, Census Tract 6940, Montgomery County, Texas | 35.9% |
| 483396940003 | Block Group 3, Census Tract 6940, Montgomery County, Texas | 48.2% |
| 483396940004 | Block Group 4, Census Tract 6940, Montgomery County, Texas | 41.3% |
| 483396941011 | Block Group 1, Census Tract 6941.01, Montgomery County, Texas | 76.2% |
| 483396941012 | Block Group 2, Census Tract 6941.01, Montgomery County, Texas | 43.9% |
| 483396941013 | Block Group 3, Census Tract 6941.01, Montgomery County, Texas | 78.1% |
| 483396941014 | Block Group 4, Census Tract 6941.01, Montgomery County, Texas | 56.5% |
| 483396941015 | Block Group 5, Census Tract 6941.01, Montgomery County, Texas | 48.4% |
| 483396941021 | Block Group 1, Census Tract 6941.02, Montgomery County, Texas | 42.6% |
| 483396941022 | Block Group 2, Census Tract 6941.02, Montgomery County, Texas | 43.1% |
| 483396942011 | Block Group 1, Census Tract 6942.01, Montgomery County, Texas | 74.3% |
| 483396942012 | Block Group 2, Census Tract 6942.01, Montgomery County, Texas | 29.1% |
| 483396942013 | Block Group 3, Census Tract 6942.01, Montgomery County, Texas | 32.0% |
| 483396942021 | Block Group 1, Census Tract 6942.02, Montgomery County, Texas | 20.4% |
| 483396942022 | Block Group 2, Census Tract 6942.02, Montgomery County, Texas | 27.0% |
| 483396942023 | Block Group 3, Census Tract 6942.02, Montgomery County, Texas | 9.2% |
| 483396942024 | Block Group 4, Census Tract 6942.02, Montgomery County, Texas | 17.1% |
| 483396942025 | Block Group 5, Census Tract 6942.02, Montgomery County, Texas | 24.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483396943011 | Block Group 1, Census Tract 6943.01, Montgomery County, Texas | 13.8% |
| 483396943012 | Block Group 2, Census Tract 6943.01, Montgomery County, Texas | 14.2% |
| 483396943013 | Block Group 3, Census Tract 6943.01, Montgomery County, Texas | 24.1% |
| 483396943021 | Block Group 1, Census Tract 6943.02, Montgomery County, Texas | 14.9% |
| 483396943022 | Block Group 2, Census Tract 6943.02, Montgomery County, Texas | 20.3% |
| 483396943023 | Block Group 3, Census Tract 6943.02, Montgomery County, Texas | 20.2% |
| 483396944001 | Block Group 1, Census Tract 6944, Montgomery County, Texas | 38.3% |
| 483396944002 | Block Group 2, Census Tract 6944, Montgomery County, Texas | 35.4% |
| 483396944003 | Block Group 3, Census Tract 6944, Montgomery County, Texas | 35.1% |
| 483396945001 | Block Group 1, Census Tract 6945, Montgomery County, Texas | 28.4% |
| 483396945002 | Block Group 2, Census Tract 6945, Montgomery County, Texas | 14.9% |
| 483396946001 | Block Group 1, Census Tract 6946, Montgomery County, Texas | 31.2% |
| 483396946002 | Block Group 2, Census Tract 6946, Montgomery County, Texas | 33.2% |
| 483396946003 | Block Group 3, Census Tract 6946, Montgomery County, Texas | 9.9% |
| 483396947001 | Block Group 1, Census Tract 6947, Montgomery County, Texas | 38.7% |
| 483396947002 | Block Group 2, Census Tract 6947, Montgomery County, Texas | 19.5% |
| 483519501001 | Block Group 1, Census Tract 9501, Newton County, Texas | 36.9% |
| 483519501002 | Block Group 2, Census Tract 9501, Newton County, Texas | 65.2% |
| 483519501003 | Block Group 3, Census Tract 9501, Newton County, Texas | 49.2% |
| 483519502001 | Block Group 1, Census Tract 9502, Newton County, Texas | 44.0% |
| 483519502002 | Block Group 2, Census Tract 9502, Newton County, Texas | 76.0% |
| 483519502003 | Block Group 3, Census Tract 9502, Newton County, Texas | 32.4% |
| 483519502004 | Block Group 4, Census Tract 9502, Newton County, Texas | 33.8% |
| 483519502005 | Block Group 5, Census Tract 9502, Newton County, Texas | 45.5% |
| 483519502006 | Block Group 6, Census Tract 9502, Newton County, Texas | 23.1% |
| 483519503001 | Block Group 1, Census Tract 9503, Newton County, Texas | 30.4% |
| 483519503002 | Block Group 2, Census Tract 9503, Newton County, Texas | 40.5% |
| 483519504001 | Block Group 1, Census Tract 9504, Newton County, Texas | 37.3% |
| 483519504002 | Block Group 2, Census Tract 9504, Newton County, Texas | 17.0% |
| 483519504003 | Block Group 3, Census Tract 9504, Newton County, Texas | 19.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550005001 | Block Group 1, Census Tract 5, Nueces County, Texas | 54.4% |
| 483550006001 | Block Group 1, Census Tract 6, Nueces County, Texas | 53.1% |
| 483550006002 | Block Group 2, Census Tract 6, Nueces County, Texas | 90.1% |
| 483550006003 | Block Group 3, Census Tract 6, Nueces County, Texas | 93.8% |
| 483550006004 | Block Group 4, Census Tract 6, Nueces County, Texas | 82.0% |
| 483550006005 | Block Group 5, Census Tract 6, Nueces County, Texas | 55.2% |
| 483550006006 | Block Group 6, Census Tract 6, Nueces County, Texas | 69.6% |
| 483550006007 | Block Group 7, Census Tract 6, Nueces County, Texas | 78.9% |
| 483550007001 | Block Group 1, Census Tract 7, Nueces County, Texas | 68.7% |
| 483550007002 | Block Group 2, Census Tract 7, Nueces County, Texas | 72.4% |
| 483550007003 | Block Group 3, Census Tract 7, Nueces County, Texas | 46.8% |
| 483550008001 | Block Group 1, Census Tract 8, Nueces County, Texas | 69.9% |
| 483550008002 | Block Group 2, Census Tract 8, Nueces County, Texas | 76.6% |
| 483550009001 | Block Group 1, Census Tract 9, Nueces County, Texas | 75.7% |
| 483550009002 | Block Group 2, Census Tract 9, Nueces County, Texas | 77.7% |
| 483550009003 | Block Group 3, Census Tract 9, Nueces County, Texas | 86.7% |
| 483550009004 | Block Group 4, Census Tract 9, Nueces County, Texas | 61.2% |
| 483550010001 | Block Group 1, Census Tract 10, Nueces County, Texas | 63.4% |
| 483550010002 | Block Group 2, Census Tract 10, Nueces County, Texas | 58.5% |
| 483550010003 | Block Group 3, Census Tract 10, Nueces County, Texas | 79.0% |
| 483550010004 | Block Group 4, Census Tract 10, Nueces County, Texas | 76.2% |
| 483550011001 | Block Group 1, Census Tract 11, Nueces County, Texas | 88.0% |
| 483550011002 | Block Group 2, Census Tract 11, Nueces County, Texas | 54.4% |
| 483550012001 | Block Group 1, Census Tract 12, Nueces County, Texas | 78.1% |
| 483550012002 | Block Group 2, Census Tract 12, Nueces County, Texas | 60.3% |
| 483550012003 | Block Group 3, Census Tract 12, Nueces County, Texas | 70.3% |
| 483550013001 | Block Group 1, Census Tract 13, Nueces County, Texas | 50.7% |
| 483550013002 | Block Group 2, Census Tract 13, Nueces County, Texas | 94.4% |
| 483550013003 | Block Group 3, Census Tract 13, Nueces County, Texas | 58.7% |
| 483550013004 | Block Group 4, Census Tract 13, Nueces County, Texas | 60.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550014001 | Block Group 1, Census Tract 14, Nueces County, Texas | 36.3% |
| 483550014002 | Block Group 2, Census Tract 14, Nueces County, Texas | 12.6% |
| 483550014003 | Block Group 3, Census Tract 14, Nueces County, Texas | 24.2% |
| 483550014004 | Block Group 4, Census Tract 14, Nueces County, Texas | 21.8% |
| 483550015001 | Block Group 1, Census Tract 15, Nueces County, Texas | 98.3% |
| 483550015002 | Block Group 2, Census Tract 15, Nueces County, Texas | 70.4% |
| 483550015003 | Block Group 3, Census Tract 15, Nueces County, Texas | 44.8% |
| 483550016011 | Block Group 1, Census Tract 16.01, Nueces County, Texas | 47.3% |
| 483550016012 | Block Group 2, Census Tract 16.01, Nueces County, Texas | 67.2% |
| 483550016013 | Block Group 3, Census Tract 16.01, Nueces County, Texas | 44.5% |
| 483550016014 | Block Group 4, Census Tract 16.01, Nueces County, Texas | 79.8% |
| 483550016021 | Block Group 1, Census Tract 16.02, Nueces County, Texas | 44.8% |
| 483550016022 | Block Group 2, Census Tract 16.02, Nueces County, Texas | 67.9% |
| 483550016023 | Block Group 3, Census Tract 16.02, Nueces County, Texas | 44.4% |
| 483550017011 | Block Group 1, Census Tract 17.01, Nueces County, Texas | 44.9% |
| 483550017012 | Block Group 2, Census Tract 17.01, Nueces County, Texas | 29.1% |
| 483550017013 | Block Group 3, Census Tract 17.01, Nueces County, Texas | 28.2% |
| 483550017014 | Block Group 4, Census Tract 17.01, Nueces County, Texas | 41.0% |
| 483550017015 | Block Group 5, Census Tract 17.01, Nueces County, Texas | 100.0% |
| 483550017016 | Block Group 6, Census Tract 17.01, Nueces County, Texas | 56.9% |
| 483550017021 | Block Group 1, Census Tract 17.02, Nueces County, Texas | 44.0% |
| 483550017022 | Block Group 2, Census Tract 17.02, Nueces County, Texas | 42.4% |
| 483550018011 | Block Group 1, Census Tract 18.01, Nueces County, Texas | 85.4% |
| 483550018012 | Block Group 2, Census Tract 18.01, Nueces County, Texas | 58.1% |
| 483550018013 | Block Group 3, Census Tract 18.01, Nueces County, Texas | 71.4% |
| 483550018014 | Block Group 4, Census Tract 18.01, Nueces County, Texas | 61.2% |
| 483550018015 | Block Group 5, Census Tract 18.01, Nueces County, Texas | 63.9% |
| 483550018021 | Block Group 1, Census Tract 18.02, Nueces County, Texas | 33.8% |
| 483550018022 | Block Group 2, Census Tract 18.02, Nueces County, Texas | 43.0% |
| 483550019021 | Block Group 1, Census Tract 19.02, Nueces County, Texas | 16.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550019022 | Block Group 2, Census Tract 19.02, Nueces County, Texas | 57.3% |
| 483550019023 | Block Group 3, Census Tract 19.02, Nueces County, Texas | 27.3% |
| 483550019031 | Block Group 1, Census Tract 19.03, Nueces County, Texas | 44.9% |
| 483550019032 | Block Group 2, Census Tract 19.03, Nueces County, Texas | 84.8% |
| 483550019033 | Block Group 3, Census Tract 19.03, Nueces County, Texas | 48.9% |
| 483550019041 | Block Group 1, Census Tract 19.04, Nueces County, Texas | 36.7% |
| 483550019042 | Block Group 2, Census Tract 19.04, Nueces County, Texas | 56.5% |
| 483550019043 | Block Group 3, Census Tract 19.04, Nueces County, Texas | 61.2% |
| 483550020011 | Block Group 1, Census Tract 20.01, Nueces County, Texas | 56.6% |
| 483550020012 | Block Group 2, Census Tract 20.01, Nueces County, Texas | 46.7% |
| 483550020013 | Block Group 3, Census Tract 20.01, Nueces County, Texas | 27.7% |
| 483550020014 | Block Group 4, Census Tract 20.01, Nueces County, Texas | 82.2% |
| 483550020021 | Block Group 1, Census Tract 20.02, Nueces County, Texas | 50.9% |
| 483550020022 | Block Group 2, Census Tract 20.02, Nueces County, Texas | 69.1% |
| 483550020023 | Block Group 3, Census Tract 20.02, Nueces County, Texas | 35.6% |
| 483550021011 | Block Group 1, Census Tract 21.01, Nueces County, Texas | 79.9% |
| 483550021012 | Block Group 2, Census Tract 21.01, Nueces County, Texas | 12.4% |
| 483550021013 | Block Group 3, Census Tract 21.01, Nueces County, Texas | 51.3% |
| 483550021014 | Block Group 4, Census Tract 21.01, Nueces County, Texas | 55.0% |
| 483550021021 | Block Group 1, Census Tract 21.02, Nueces County, Texas | 24.2% |
| 483550021022 | Block Group 2, Census Tract 21.02, Nueces County, Texas | 24.9% |
| 483550021023 | Block Group 3, Census Tract 21.02, Nueces County, Texas | 6.6% |
| 483550022001 | Block Group 1, Census Tract 22, Nueces County, Texas | 33.6% |
| 483550022002 | Block Group 2, Census Tract 22, Nueces County, Texas | 72.2% |
| 483550022003 | Block Group 3, Census Tract 22, Nueces County, Texas | 28.7% |
| 483550022004 | Block Group 4, Census Tract 22, Nueces County, Texas | 52.4% |
| 483550022005 | Block Group 5, Census Tract 22, Nueces County, Texas | 58.3% |
| 483550023011 | Block Group 1, Census Tract 23.01, Nueces County, Texas | 58.2% |
| 483550023012 | Block Group 2, Census Tract 23.01, Nueces County, Texas | 39.8% |
| 483550023013 | Block Group 3, Census Tract 23.01, Nueces County, Texas | 29.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550023031 | Block Group 1, Census Tract 23.03, Nueces County, Texas | 39.8% |
| 483550023032 | Block Group 2, Census Tract 23.03, Nueces County, Texas | 65.2% |
| 483550023033 | Block Group 3, Census Tract 23.03, Nueces County, Texas | 26.0% |
| 483550023041 | Block Group 1, Census Tract 23.04, Nueces County, Texas | 44.7% |
| 483550023042 | Block Group 2, Census Tract 23.04, Nueces County, Texas | 45.5% |
| 483550023043 | Block Group 3, Census Tract 23.04, Nueces County, Texas | 66.1% |
| 483550023044 | Block Group 4, Census Tract 23.04, Nueces County, Texas | 17.1% |
| 483550024001 | Block Group 1, Census Tract 24, Nueces County, Texas | 42.5% |
| 483550024002 | Block Group 2, Census Tract 24, Nueces County, Texas | 43.2% |
| 483550024003 | Block Group 3, Census Tract 24, Nueces County, Texas | 43.1% |
| 483550024004 | Block Group 4, Census Tract 24, Nueces County, Texas | 41.7% |
| 483550024005 | Block Group 5, Census Tract 24, Nueces County, Texas | 36.4% |
| 483550025001 | Block Group 1, Census Tract 25, Nueces County, Texas | 23.0% |
| 483550025002 | Block Group 2, Census Tract 25, Nueces County, Texas | 11.8% |
| 483550025003 | Block Group 3, Census Tract 25, Nueces County, Texas | 21.5% |
| 483550025004 | Block Group 4, Census Tract 25, Nueces County, Texas | 54.6% |
| 483550026011 | Block Group 1, Census Tract 26.01, Nueces County, Texas | 41.3% |
| 483550026012 | Block Group 2, Census Tract 26.01, Nueces County, Texas | 55.5% |
| 483550026021 | Block Group 1, Census Tract 26.02, Nueces County, Texas | 46.6% |
| 483550026022 | Block Group 2, Census Tract 26.02, Nueces County, Texas | 61.7% |
| 483550026031 | Block Group 1, Census Tract 26.03, Nueces County, Texas | 32.8% |
| 483550026032 | Block Group 2, Census Tract 26.03, Nueces County, Texas | 29.5% |
| 483550026033 | Block Group 3, Census Tract 26.03, Nueces County, Texas | 16.3% |
| 483550027031 | Block Group 1, Census Tract 27.03, Nueces County, Texas | 35.7% |
| 483550027032 | Block Group 2, Census Tract 27.03, Nueces County, Texas | 55.5% |
| 483550027033 | Block Group 3, Census Tract 27.03, Nueces County, Texas | 28.1% |
| 483550027034 | Block Group 4, Census Tract 27.03, Nueces County, Texas | 12.9% |
| 483550027035 | Block Group 5, Census Tract 27.03, Nueces County, Texas | 10.8% |
| 483550027041 | Block Group 1, Census Tract 27.04, Nueces County, Texas | 31.3% |
| 483550027042 | Block Group 2, Census Tract 27.04, Nueces County, Texas | 49.1% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550027043 | Block Group 3, Census Tract 27.04, Nueces County, Texas | 52.5% |
| 483550027044 | Block Group 4, Census Tract 27.04, Nueces County, Texas | 29.8% |
| 483550027051 | Block Group 1, Census Tract 27.05, Nueces County, Texas | 7.1% |
| 483550027052 | Block Group 2, Census Tract 27.05, Nueces County, Texas | 18.5% |
| 483550027053 | Block Group 3, Census Tract 27.05, Nueces County, Texas | 21.5% |
| 483550027054 | Block Group 4, Census Tract 27.05, Nueces County, Texas | 36.8% |
| 483550027061 | Block Group 1, Census Tract 27.06, Nueces County, Texas | 100.0% |
| 483550029001 | Block Group 1, Census Tract 29, Nueces County, Texas | 38.1% |
| 483550030011 | Block Group 1, Census Tract 30.01, Nueces County, Texas | 41.4% |
| 483550030012 | Block Group 2, Census Tract 30.01, Nueces County, Texas | 60.9% |
| 483550030013 | Block Group 3, Census Tract 30.01, Nueces County, Texas | 70.2% |
| 483550030021 | Block Group 1, Census Tract 30.02, Nueces County, Texas | 37.9% |
| 483550030022 | Block Group 2, Census Tract 30.02, Nueces County, Texas | 55.9% |
| 483550030023 | Block Group 3, Census Tract 30.02, Nueces County, Texas | 61.6% |
| 483550031011 | Block Group 1, Census Tract 31.01, Nueces County, Texas | 29.6% |
| 483550031012 | Block Group 2, Census Tract 31.01, Nueces County, Texas | 7.9% |
| 483550031013 | Block Group 3, Census Tract 31.01, Nueces County, Texas | 2.2% |
| 483550031014 | Block Group 4, Census Tract 31.01, Nueces County, Texas | 18.7% |
| 483550031015 | Block Group 5, Census Tract 31.01, Nueces County, Texas | 40.6% |
| 483550031021 | Block Group 1, Census Tract 31.02, Nueces County, Texas | 25.9% |
| 483550031022 | Block Group 2, Census Tract 31.02, Nueces County, Texas | 22.1% |
| 483550032021 | Block Group 1, Census Tract 32.02, Nueces County, Texas | 15.2% |
| 483550032022 | Block Group 2, Census Tract 32.02, Nueces County, Texas | 35.4% |
| 483550032023 | Block Group 3, Census Tract 32.02, Nueces County, Texas | 18.3% |
| 483550032031 | Block Group 1, Census Tract 32.03, Nueces County, Texas | 41.8% |
| 483550032032 | Block Group 2, Census Tract 32.03, Nueces County, Texas | 65.2% |
| 483550032033 | Block Group 3, Census Tract 32.03, Nueces County, Texas | 39.0% |
| 483550032041 | Block Group 1, Census Tract 32.04, Nueces County, Texas | 31.3% |
| 483550032042 | Block Group 2, Census Tract 32.04, Nueces County, Texas | 4.9% |
| 483550033031 | Block Group 1, Census Tract 33.03, Nueces County, Texas | 43.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550033032 | Block Group 2, Census Tract 33.03, Nueces County, Texas | 72.8% |
| 483550033041 | Block Group 1, Census Tract 33.04, Nueces County, Texas | 35.1% |
| 483550033042 | Block Group 2, Census Tract 33.04, Nueces County, Texas | 21.6% |
| 483550033043 | Block Group 3, Census Tract 33.04, Nueces County, Texas | 26.3% |
| 483550033051 | Block Group 1, Census Tract 33.05, Nueces County, Texas | 64.7% |
| 483550033052 | Block Group 2, Census Tract 33.05, Nueces County, Texas | 96.9% |
| 483550033061 | Block Group 1, Census Tract 33.06, Nueces County, Texas | 33.0% |
| 483550033062 | Block Group 2, Census Tract 33.06, Nueces County, Texas | 39.0% |
| 483550034011 | Block Group 1, Census Tract 34.01, Nueces County, Texas | 48.2% |
| 483550034012 | Block Group 2, Census Tract 34.01, Nueces County, Texas | 39.7% |
| 483550034013 | Block Group 3, Census Tract 34.01, Nueces County, Texas | 20.5% |
| 483550034021 | Block Group 1, Census Tract 34.02, Nueces County, Texas | 50.0% |
| 483550034022 | Block Group 2, Census Tract 34.02, Nueces County, Texas | 70.5% |
| 483550034023 | Block Group 3, Census Tract 34.02, Nueces County, Texas | 50.1% |
| 483550034024 | Block Group 4, Census Tract 34.02, Nueces County, Texas | 1.5% |
| 483550034025 | Block Group 5, Census Tract 34.02, Nueces County, Texas | 8.7% |
| 483550035001 | Block Group 1, Census Tract 35, Nueces County, Texas | 33.5% |
| 483550035002 | Block Group 2, Census Tract 35, Nueces County, Texas | 67.4% |
| 483550036011 | Block Group 1, Census Tract 36.01, Nueces County, Texas | 77.1% |
| 483550036012 | Block Group 2, Census Tract 36.01, Nueces County, Texas | 12.4% |
| 483550036013 | Block Group 3, Census Tract 36.01, Nueces County, Texas | 31.6% |
| 483550036014 | Block Group 4, Census Tract 36.01, Nueces County, Texas | 13.7% |
| 483550036021 | Block Group 1, Census Tract 36.02, Nueces County, Texas | 48.6% |
| 483550036022 | Block Group 2, Census Tract 36.02, Nueces County, Texas | 19.9% |
| 483550036023 | Block Group 3, Census Tract 36.02, Nueces County, Texas | 26.5% |
| 483550036024 | Block Group 4, Census Tract 36.02, Nueces County, Texas | 38.9% |
| 483550036031 | Block Group 1, Census Tract 36.03, Nueces County, Texas | 35.3% |
| 483550036032 | Block Group 2, Census Tract 36.03, Nueces County, Texas | 30.1% |
| 483550037001 | Block Group 1, Census Tract 37, Nueces County, Texas | 34.2% |
| 483550037002 | Block Group 2, Census Tract 37, Nueces County, Texas | 31.9% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550037003 | Block Group 3, Census Tract 37, Nueces County, Texas | 35.3% |
| 483550051021 | Block Group 1, Census Tract 51.02, Nueces County, Texas | 39.9% |
| 483550051022 | Block Group 2, Census Tract 51.02, Nueces County, Texas | 41.3% |
| 483550054041 | Block Group 1, Census Tract 54.04, Nueces County, Texas | 4.6% |
| 483550054042 | Block Group 2, Census Tract 54.04, Nueces County, Texas | 15.1% |
| 483550054061 | Block Group 1, Census Tract 54.06, Nueces County, Texas | 26.8% |
| 483550054062 | Block Group 2, Census Tract 54.06, Nueces County, Texas | 39.9% |
| 483550054063 | Block Group 3, Census Tract 54.06, Nueces County, Texas | 4.8% |
| 483550054071 | Block Group 1, Census Tract 54.07, Nueces County, Texas | 34.8% |
| 483550054072 | Block Group 2, Census Tract 54.07, Nueces County, Texas | 17.6% |
| 483550054081 | Block Group 1, Census Tract 54.08, Nueces County, Texas | 57.6% |
| 483550054082 | Block Group 2, Census Tract 54.08, Nueces County, Texas | 33.6% |
| 483550054091 | Block Group 1, Census Tract 54.09, Nueces County, Texas | 4.0% |
| 483550054092 | Block Group 2, Census Tract 54.09, Nueces County, Texas | 5.8% |
| 483550054101 | Block Group 1, Census Tract 54.10, Nueces County, Texas | 22.8% |
| 483550054102 | Block Group 2, Census Tract 54.10, Nueces County, Texas | 9.3% |
| 483550054111 | Block Group 1, Census Tract 54.11, Nueces County, Texas | 18.8% |
| 483550054112 | Block Group 2, Census Tract 54.11, Nueces County, Texas | 37.3% |
| 483550054121 | Block Group 1, Census Tract 54.12, Nueces County, Texas | 8.2% |
| 483550054122 | Block Group 2, Census Tract 54.12, Nueces County, Texas | 5.6% |
| 483550054131 | Block Group 1, Census Tract 54.13, Nueces County, Texas | 17.1% |
| 483550054132 | Block Group 2, Census Tract 54.13, Nueces County, Texas | 39.1% |
| 483550054141 | Block Group 1, Census Tract 54.14, Nueces County, Texas | 1.9% |
| 483550054142 | Block Group 2, Census Tract 54.14, Nueces County, Texas | 9.3% |
| 483550054151 | Block Group 1, Census Tract 54.15, Nueces County, Texas | 20.1% |
| 483550054152 | Block Group 2, Census Tract 54.15, Nueces County, Texas | 7.6% |
| 483550054161 | Block Group 1, Census Tract 54.16, Nueces County, Texas | 1.7% |
| 483550054162 | Block Group 2, Census Tract 54.16, Nueces County, Texas | 1.8% |
| 483550054171 | Block Group 1, Census Tract 54.17, Nueces County, Texas | 16.5% |
| 483550054172 | Block Group 2, Census Tract 54.17, Nueces County, Texas | 24.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483550056011 | Block Group 1, Census Tract 56.01, Nueces County, Texas | 18.1% |
| 483550056012 | Block Group 2, Census Tract 56.01, Nueces County, Texas | 28.8% |
| 483550056013 | Block Group 3, Census Tract 56.01, Nueces County, Texas | 49.1% |
| 483550056014 | Block Group 4, Census Tract 56.01, Nueces County, Texas | 41.5% |
| 483550056015 | Block Group 5, Census Tract 56.01, Nueces County, Texas | 30.4% |
| 483550056021 | Block Group 1, Census Tract 56.02, Nueces County, Texas | 65.5% |
| 483550056022 | Block Group 2, Census Tract 56.02, Nueces County, Texas | 92.1% |
| 483550056023 | Block Group 3, Census Tract 56.02, Nueces County, Texas | 77.1% |
| 483550056024 | Block Group 4, Census Tract 56.02, Nueces County, Texas | 74.2% |
| 483550058011 | Block Group 1, Census Tract 58.01, Nueces County, Texas | 10.5% |
| 483550058012 | Block Group 2, Census Tract 58.01, Nueces County, Texas | 4.0% |
| 483550058013 | Block Group 3, Census Tract 58.01, Nueces County, Texas | 5.4% |
| 483550058021 | Block Group 1, Census Tract 58.02, Nueces County, Texas | 35.6% |
| 483550058022 | Block Group 2, Census Tract 58.02, Nueces County, Texas | 40.8% |
| 483550058023 | Block Group 3, Census Tract 58.02, Nueces County, Texas | 28.0% |
| 483550059001 | Block Group 1, Census Tract 59, Nueces County, Texas | 60.9% |
| 483550059002 | Block Group 2, Census Tract 59, Nueces County, Texas | 40.4% |
| 483550060001 | Block Group 1, Census Tract 60, Nueces County, Texas | 27.0% |
| 483550060002 | Block Group 2, Census Tract 60, Nueces County, Texas | 35.6% |
| 483550061001 | Block Group 1, Census Tract 61, Nueces County, Texas | 76.8% |
| 483550061002 | Block Group 2, Census Tract 61, Nueces County, Texas | 29.4% |
| 483550061003 | Block Group 3, Census Tract 61, Nueces County, Texas | 21.6% |
| 483550062001 | Block Group 1, Census Tract 62, Nueces County, Texas | 48.8% |
| 483550062002 | Block Group 2, Census Tract 62, Nueces County, Texas | 16.0% |
| 483550062003 | Block Group 3, Census Tract 62, Nueces County, Texas | 13.2% |
| 483550063001 | Block Group 1, Census Tract 63, Nueces County, Texas | 39.1% |
| 483550063002 | Block Group 2, Census Tract 63, Nueces County, Texas | 45.8% |
| 483550064001 | Block Group 1, Census Tract 64, Nueces County, Texas | 90.3% |
| 483550064002 | Block Group 2, Census Tract 64, Nueces County, Texas | 62.2% |
| 483550064003 | Block Group 3, Census Tract 64, Nueces County, Texas | 90.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483559800001 | Block Group 1, Census Tract 9800, Nueces County, Texas | 0.0% |
| 483559900000 | Block Group 0, Census Tract 9900, Nueces County, Texas | 0.0% |
| 483610202001 | Block Group 1, Census Tract 202, Orange County, Texas | 56.0% |
| 483610202002 | Block Group 2, Census Tract 202, Orange County, Texas | 30.4% |
| 483610202003 | Block Group 3, Census Tract 202, Orange County, Texas | 40.8% |
| 483610202004 | Block Group 4, Census Tract 202, Orange County, Texas | 62.7% |
| 483610203001 | Block Group 1, Census Tract 203, Orange County, Texas | 69.2% |
| 483610203002 | Block Group 2, Census Tract 203, Orange County, Texas | 30.6% |
| 483610203003 | Block Group 3, Census Tract 203, Orange County, Texas | 75.9% |
| 483610205001 | Block Group 1, Census Tract 205, Orange County, Texas | 43.7% |
| 483610205002 | Block Group 2, Census Tract 205, Orange County, Texas | 40.4% |
| 483610205003 | Block Group 3, Census Tract 205, Orange County, Texas | 54.9% |
| 483610205004 | Block Group 4, Census Tract 205, Orange County, Texas | 36.7% |
| 483610207001 | Block Group 1, Census Tract 207, Orange County, Texas | 24.4% |
| 483610207002 | Block Group 2, Census Tract 207, Orange County, Texas | 43.1% |
| 483610207003 | Block Group 3, Census Tract 207, Orange County, Texas | 56.3% |
| 483610207004 | Block Group 4, Census Tract 207, Orange County, Texas | 67.0% |
| 483610208001 | Block Group 1, Census Tract 208, Orange County, Texas | 50.5% |
| 483610208002 | Block Group 2, Census Tract 208, Orange County, Texas | 36.1% |
| 483610209001 | Block Group 1, Census Tract 209, Orange County, Texas | 54.6% |
| 483610209002 | Block Group 2, Census Tract 209, Orange County, Texas | 54.5% |
| 483610209003 | Block Group 3, Census Tract 209, Orange County, Texas | 58.9% |
| 483610209004 | Block Group 4, Census Tract 209, Orange County, Texas | 27.4% |
| 483610210001 | Block Group 1, Census Tract 210, Orange County, Texas | 27.8% |
| 483610211001 | Block Group 1, Census Tract 211, Orange County, Texas | 17.5% |
| 483610212001 | Block Group 1, Census Tract 212, Orange County, Texas | 47.6% |
| 483610212002 | Block Group 2, Census Tract 212, Orange County, Texas | 26.1% |
| 483610212003 | Block Group 3, Census Tract 212, Orange County, Texas | 19.3% |
| 483610213001 | Block Group 1, Census Tract 213, Orange County, Texas | 18.3% |
| 483610213002 | Block Group 2, Census Tract 213, Orange County, Texas | 25.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483610213003 | Block Group 3, Census Tract 213, Orange County, Texas | 29.2% |
| 483610214001 | Block Group 1, Census Tract 214, Orange County, Texas | 14.8% |
| 483610214002 | Block Group 2, Census Tract 214, Orange County, Texas | 29.0% |
| 483610215011 | Block Group 1, Census Tract 215.01, Orange County, Texas | 20.4% |
| 483610215021 | Block Group 1, Census Tract 215.02, Orange County, Texas | 53.9% |
| 483610215022 | Block Group 2, Census Tract 215.02, Orange County, Texas | 66.2% |
| 483610215023 | Block Group 3, Census Tract 215.02, Orange County, Texas | 56.9% |
| 483610215024 | Block Group 4, Census Tract 215.02, Orange County, Texas | 21.5% |
| 483610215025 | Block Group 5, Census Tract 215.02, Orange County, Texas | 39.7% |
| 483610216001 | Block Group 1, Census Tract 216, Orange County, Texas | 33.2% |
| 483610216002 | Block Group 2, Census Tract 216, Orange County, Texas | 35.8% |
| 483610216003 | Block Group 3, Census Tract 216, Orange County, Texas | 26.7% |
| 483610217001 | Block Group 1, Census Tract 217, Orange County, Texas | 21.5% |
| 483610217002 | Block Group 2, Census Tract 217, Orange County, Texas | 51.0% |
| 483610218001 | Block Group 1, Census Tract 218, Orange County, Texas | 17.2% |
| 483610218002 | Block Group 2, Census Tract 218, Orange County, Texas | 39.4% |
| 483610219001 | Block Group 1, Census Tract 219, Orange County, Texas | 38.4% |
| 483610219002 | Block Group 2, Census Tract 219, Orange County, Texas | 41.4% |
| 483610219003 | Block Group 3, Census Tract 219, Orange County, Texas | 48.0% |
| 483610219004 | Block Group 4, Census Tract 219, Orange County, Texas | 36.5% |
| 483610219005 | Block Group 5, Census Tract 219, Orange County, Texas | 54.8% |
| 483610219006 | Block Group 6, Census Tract 219, Orange County, Texas | 22.7% |
| 483610220001 | Block Group 1, Census Tract 220, Orange County, Texas | 53.2% |
| 483610220002 | Block Group 2, Census Tract 220, Orange County, Texas | 36.8% |
| 483610220003 | Block Group 3, Census Tract 220, Orange County, Texas | 38.5% |
| 483610222001 | Block Group 1, Census Tract 222, Orange County, Texas | 8.2% |
| 483610222002 | Block Group 2, Census Tract 222, Orange County, Texas | 26.8% |
| 483610223001 | Block Group 1, Census Tract 223, Orange County, Texas | 7.1% |
| 483610223002 | Block Group 2, Census Tract 223, Orange County, Texas | 21.8% |
| 483610223003 | Block Group 3, Census Tract 223, Orange County, Texas | 31.5% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483610223004 | Block Group 4, Census Tract 223, Orange County, Texas | 8.6% |
| 483610223005 | Block Group 5, Census Tract 223, Orange County, Texas | 12.6% |
| 483610224001 | Block Group 1, Census Tract 224, Orange County, Texas | 17.9% |
| 483610224002 | Block Group 2, Census Tract 224, Orange County, Texas | 53.6% |
| 483610224003 | Block Group 3, Census Tract 224, Orange County, Texas | 62.1% |
| 483610224004 | Block Group 4, Census Tract 224, Orange County, Texas | 17.6% |
| 483610224005 | Block Group 5, Census Tract 224, Orange County, Texas | 9.0% |
| 483732101011 | Block Group 1, Census Tract 2101.01, Polk County, Texas | 39.3% |
| 483732101012 | Block Group 2, Census Tract 2101.01, Polk County, Texas | 51.8% |
| 483732101013 | Block Group 3, Census Tract 2101.01, Polk County, Texas | 37.8% |
| 483732101021 | Block Group 1, Census Tract 2101.02, Polk County, Texas | 46.0% |
| 483732101022 | Block Group 2, Census Tract 2101.02, Polk County, Texas | 35.9% |
| 483732101023 | Block Group 3, Census Tract 2101.02, Polk County, Texas | 77.0% |
| 483732101024 | Block Group 4, Census Tract 2101.02, Polk County, Texas | 42.7% |
| 483732102031 | Block Group 1, Census Tract 2102.03, Polk County, Texas | 64.6% |
| 483732102032 | Block Group 2, Census Tract 2102.03, Polk County, Texas | 56.1% |
| 483732102041 | Block Group 1, Census Tract 2102.04, Polk County, Texas | 47.6% |
| 483732102042 | Block Group 2, Census Tract 2102.04, Polk County, Texas | 74.5% |
| 483732102043 | Block Group 3, Census Tract 2102.04, Polk County, Texas | 50.3% |
| 483732102051 | Block Group 1, Census Tract 2102.05, Polk County, Texas | 52.6% |
| 483732102052 | Block Group 2, Census Tract 2102.05, Polk County, Texas | 37.4% |
| 483732102061 | Block Group 1, Census Tract 2102.06, Polk County, Texas | 56.4% |
| 483732102062 | Block Group 2, Census Tract 2102.06, Polk County, Texas | 39.7% |
| 483732102063 | Block Group 3, Census Tract 2102.06, Polk County, Texas | 21.7% |
| 483732103011 | Block Group 1, Census Tract 2103.01, Polk County, Texas | 33.6% |
| 483732103012 | Block Group 2, Census Tract 2103.01, Polk County, Texas | 66.7% |
| 483732103013 | Block Group 3, Census Tract 2103.01, Polk County, Texas | 70.0% |
| 483732103021 | Block Group 1, Census Tract 2103.02, Polk County, Texas | 46.9% |
| 483732103022 | Block Group 2, Census Tract 2103.02, Polk County, Texas | 48.5% |
| 483732103023 | Block Group 3, Census Tract 2103.02, Polk County, Texas | 79.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 483732103024 | Block Group 4, Census Tract 2103.02, Polk County, Texas | 51.2% |
| 483732104001 | Block Group 1, Census Tract 2104, Polk County, Texas | 57.9% |
| 483732104002 | Block Group 2, Census Tract 2104, Polk County, Texas | 41.2% |
| 483732104003 | Block Group 3, Census Tract 2104, Polk County, Texas | 47.1% |
| 483732104004 | Block Group 4, Census Tract 2104, Polk County, Texas | 21.7% |
| 483732105001 | Block Group 1, Census Tract 2105, Polk County, Texas | 58.6% |
| 483732105002 | Block Group 2, Census Tract 2105, Polk County, Texas | 42.3% |
| 483732105003 | Block Group 3, Census Tract 2105, Polk County, Texas | 52.0% |
| 483919502001 | Block Group 1, Census Tract 9502, Refugio County, Texas | 18.8% |
| 483919502002 | Block Group 2, Census Tract 9502, Refugio County, Texas | 30.2% |
| 483919502003 | Block Group 3, Census Tract 9502, Refugio County, Texas | 66.7% |
| 483919502004 | Block Group 4, Census Tract 9502, Refugio County, Texas | 72.6% |
| 483919504001 | Block Group 1, Census Tract 9504, Refugio County, Texas | 24.4% |
| 483919504002 | Block Group 2, Census Tract 9504, Refugio County, Texas | 45.9% |
| 483919504003 | Block Group 3, Census Tract 9504, Refugio County, Texas | 41.9% |
| 483919504004 | Block Group 4, Census Tract 9504, Refugio County, Texas | 38.2% |
| 484039501001 | Block Group 1, Census Tract 9501, Sabine County, Texas | 36.8% |
| 484039501002 | Block Group 2, Census Tract 9501, Sabine County, Texas | 40.3% |
| 484039502001 | Block Group 1, Census Tract 9502, Sabine County, Texas | 38.8% |
| 484039502002 | Block Group 2, Census Tract 9502, Sabine County, Texas | 40.5% |
| 484039502003 | Block Group 3, Census Tract 9502, Sabine County, Texas | 40.4% |
| 484039503001 | Block Group 1, Census Tract 9503, Sabine County, Texas | 42.0% |
| 484039503002 | Block Group 2, Census Tract 9503, Sabine County, Texas | 55.1% |
| 484039503003 | Block Group 3, Census Tract 9503, Sabine County, Texas | 57.0% |
| 484039503004 | Block Group 4, Census Tract 9503, Sabine County, Texas | 38.0% |
| 484039503005 | Block Group 5, Census Tract 9503, Sabine County, Texas | 35.0% |
| 484059501001 | Block Group 1, Census Tract 9501, San Augustine County, Texas | 40.0% |
| 484059501002 | Block Group 2, Census Tract 9501, San Augustine County, Texas | 55.2% |
| 484059501003 | Block Group 3, Census Tract 9501, San Augustine County, Texas | 35.4% |
| 484059502001 | Block Group 1, Census Tract 9502, San Augustine County, Texas | 76.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484059502002 | Block Group 2, Census Tract 9502, San Augustine County, Texas | 81.9% |
| 484059502003 | Block Group 3, Census Tract 9502, San Augustine County, Texas | 51.9% |
| 484059503001 | Block Group 1, Census Tract 9503, San Augustine County, Texas | 30.3% |
| 484059503002 | Block Group 2, Census Tract 9503, San Augustine County, Texas | 53.6% |
| 484072001011 | Block Group 1, Census Tract 2001.01, San Jacinto County, Texas | 51.0% |
| 484072001012 | Block Group 2, Census Tract 2001.01, San Jacinto County, Texas | 44.6% |
| 484072001013 | Block Group 3, Census Tract 2001.01, San Jacinto County, Texas | 62.5% |
| 484072001021 | Block Group 1, Census Tract 2001.02, San Jacinto County, Texas | 39.3% |
| 484072001022 | Block Group 2, Census Tract 2001.02, San Jacinto County, Texas | 22.8% |
| 484072001023 | Block Group 3, Census Tract 2001.02, San Jacinto County, Texas | 49.1% |
| 484072001024 | Block Group 4, Census Tract 2001.02, San Jacinto County, Texas | 19.1% |
| 484072001025 | Block Group 5, Census Tract 2001.02, San Jacinto County, Texas | 57.9% |
| 484072002001 | Block Group 1, Census Tract 2002, San Jacinto County, Texas | 32.3% |
| 484072002002 | Block Group 2, Census Tract 2002, San Jacinto County, Texas | 52.8% |
| 484072002003 | Block Group 3, Census Tract 2002, San Jacinto County, Texas | 58.3% |
| 484072003001 | Block Group 1, Census Tract 2003, San Jacinto County, Texas | 40.9% |
| 484072003002 | Block Group 2, Census Tract 2003, San Jacinto County, Texas | 52.0% |
| 484072003003 | Block Group 3, Census Tract 2003, San Jacinto County, Texas | 50.9% |
| 484072003004 | Block Group 4, Census Tract 2003, San Jacinto County, Texas | 19.4% |
| 484090102011 | Block Group 1, Census Tract 102.01, San Patricio County, Texas | 35.2% |
| 484090102012 | Block Group 2, Census Tract 102.01, San Patricio County, Texas | 46.3% |
| 484090102013 | Block Group 3, Census Tract 102.01, San Patricio County, Texas | 45.4% |
| 484090102021 | Block Group 1, Census Tract 102.02, San Patricio County, Texas | 73.0% |
| 484090102022 | Block Group 2, Census Tract 102.02, San Patricio County, Texas | 42.2% |
| 484090102023 | Block Group 3, Census Tract 102.02, San Patricio County, Texas | 29.5% |
| 484090103011 | Block Group 1, Census Tract 103.01, San Patricio County, Texas | 30.7% |
| 484090103012 | Block Group 2, Census Tract 103.01, San Patricio County, Texas | 26.2% |
| 484090103013 | Block Group 3, Census Tract 103.01, San Patricio County, Texas | 26.3% |
| 484090103021 | Block Group 1, Census Tract 103.02, San Patricio County, Texas | 23.6% |
| 484090103022 | Block Group 2, Census Tract 103.02, San Patricio County, Texas | 16.6% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484090103023 | Block Group 3, Census Tract 103.02, San Patricio County, Texas | 60.0% |
| 484090105001 | Block Group 1, Census Tract 105, San Patricio County, Texas | 52.4% |
| 484090105002 | Block Group 2, Census Tract 105, San Patricio County, Texas | 56.6% |
| 484090106011 | Block Group 1, Census Tract 106.01, San Patricio County, Texas | 41.9% |
| 484090106012 | Block Group 2, Census Tract 106.01, San Patricio County, Texas | 26.7% |
| 484090106013 | Block Group 3, Census Tract 106.01, San Patricio County, Texas | 10.3% |
| 484090106014 | Block Group 4, Census Tract 106.01, San Patricio County, Texas | 19.3% |
| 484090106021 | Block Group 1, Census Tract 106.02, San Patricio County, Texas | 20.1% |
| 484090106022 | Block Group 2, Census Tract 106.02, San Patricio County, Texas | 34.1% |
| 484090106031 | Block Group 1, Census Tract 106.03, San Patricio County, Texas | 13.6% |
| 484090106041 | Block Group 1, Census Tract 106.04, San Patricio County, Texas | 25.3% |
| 484090106042 | Block Group 2, Census Tract 106.04, San Patricio County, Texas | 16.1% |
| 484090107001 | Block Group 1, Census Tract 107, San Patricio County, Texas | 18.8% |
| 484090107002 | Block Group 2, Census Tract 107, San Patricio County, Texas | 14.9% |
| 484090108001 | Block Group 1, Census Tract 108, San Patricio County, Texas | 41.9% |
| 484090108002 | Block Group 2, Census Tract 108, San Patricio County, Texas | 18.0% |
| 484090108003 | Block Group 3, Census Tract 108, San Patricio County, Texas | 44.8% |
| 484090108004 | Block Group 4, Census Tract 108, San Patricio County, Texas | 47.8% |
| 484090109001 | Block Group 1, Census Tract 109, San Patricio County, Texas | 32.3% |
| 484090109002 | Block Group 2, Census Tract 109, San Patricio County, Texas | 22.9% |
| 484090109003 | Block Group 3, Census Tract 109, San Patricio County, Texas | 36.2% |
| 484090110001 | Block Group 1, Census Tract 110, San Patricio County, Texas | 45.8% |
| 484090110002 | Block Group 2, Census Tract 110, San Patricio County, Texas | 54.3% |
| 484090110003 | Block Group 3, Census Tract 110, San Patricio County, Texas | 29.5% |
| 484090110004 | Block Group 4, Census Tract 110, San Patricio County, Texas | 71.7% |
| 484090111001 | Block Group 1, Census Tract 111, San Patricio County, Texas | 22.4% |
| 484090111002 | Block Group 2, Census Tract 111, San Patricio County, Texas | 29.0% |
| 484090111003 | Block Group 3, Census Tract 111, San Patricio County, Texas | 40.6% |
| 484090112001 | Block Group 1, Census Tract 112, San Patricio County, Texas | 19.4% |
| 484090112002 | Block Group 2, Census Tract 112, San Patricio County, Texas | 48.4% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484090112003 | Block Group 3, Census Tract 112, San Patricio County, Texas | 34.2% |
| 484090113001 | Block Group 1, Census Tract 113, San Patricio County, Texas | 63.3% |
| 484090113002 | Block Group 2, Census Tract 113, San Patricio County, Texas | 58.9% |
| 484090113003 | Block Group 3, Census Tract 113, San Patricio County, Texas | 61.6% |
| 484579501001 | Block Group 1, Census Tract 9501, Tyler County, Texas | 57.3% |
| 484579501002 | Block Group 2, Census Tract 9501, Tyler County, Texas | 45.5% |
| 484579501003 | Block Group 3, Census Tract 9501, Tyler County, Texas | 43.1% |
| 484579502001 | Block Group 1, Census Tract 9502, Tyler County, Texas | 58.6% |
| 484579502002 | Block Group 2, Census Tract 9502, Tyler County, Texas | 44.9% |
| 484579502003 | Block Group 3, Census Tract 9502, Tyler County, Texas | 63.1% |
| 484579502004 | Block Group 4, Census Tract 9502, Tyler County, Texas | 26.3% |
| 484579502005 | Block Group 5, Census Tract 9502, Tyler County, Texas | 25.7% |
| 484579503001 | Block Group 1, Census Tract 9503, Tyler County, Texas | 36.5% |
| 484579503002 | Block Group 2, Census Tract 9503, Tyler County, Texas | 70.7% |
| 484579504001 | Block Group 1, Census Tract 9504, Tyler County, Texas | 52.1% |
| 484579504002 | Block Group 2, Census Tract 9504, Tyler County, Texas | 44.1% |
| 484579504003 | Block Group 3, Census Tract 9504, Tyler County, Texas | 44.8% |
| 484579504004 | Block Group 4, Census Tract 9504, Tyler County, Texas | 33.7% |
| 484579505001 | Block Group 1, Census Tract 9505, Tyler County, Texas | 34.8% |
| 484579505002 | Block Group 2, Census Tract 9505, Tyler County, Texas | 51.6% |
| 484690001001 | Block Group 1, Census Tract 1, Victoria County, Texas | 42.0% |
| 484690001002 | Block Group 2, Census Tract 1, Victoria County, Texas | 42.8% |
| 484690002011 | Block Group 1, Census Tract 2.01, Victoria County, Texas | 66.0% |
| 484690002012 | Block Group 2, Census Tract 2.01, Victoria County, Texas | 79.3% |
| 484690002013 | Block Group 3, Census Tract 2.01, Victoria County, Texas | 50.5% |
| 484690002021 | Block Group 1, Census Tract 2.02, Victoria County, Texas | 71.2% |
| 484690002022 | Block Group 2, Census Tract 2.02, Victoria County, Texas | 69.2% |
| 484690002023 | Block Group 3, Census Tract 2.02, Victoria County, Texas | 32.6% |
| 484690003011 | Block Group 1, Census Tract 3.01, Victoria County, Texas | 74.1% |
| 484690003012 | Block Group 2, Census Tract 3.01, Victoria County, Texas | 93.2% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484690003021 | Block Group 1, Census Tract 3.02, Victoria County, Texas | 77.6% |
| 484690003022 | Block Group 2, Census Tract 3.02, Victoria County, Texas | 52.0% |
| 484690004001 | Block Group 1, Census Tract 4, Victoria County, Texas | 53.1% |
| 484690004002 | Block Group 2, Census Tract 4, Victoria County, Texas | 6.2% |
| 484690005011 | Block Group 1, Census Tract 5.01, Victoria County, Texas | 41.9% |
| 484690005012 | Block Group 2, Census Tract 5.01, Victoria County, Texas | 66.1% |
| 484690005013 | Block Group 3, Census Tract 5.01, Victoria County, Texas | 44.7% |
| 484690005021 | Block Group 1, Census Tract 5.02, Victoria County, Texas | 77.1% |
| 484690005022 | Block Group 2, Census Tract 5.02, Victoria County, Texas | 46.1% |
| 484690005023 | Block Group 3, Census Tract 5.02, Victoria County, Texas | 12.1% |
| 484690006011 | Block Group 1, Census Tract 6.01, Victoria County, Texas | 57.3% |
| 484690006012 | Block Group 2, Census Tract 6.01, Victoria County, Texas | 38.9% |
| 484690006013 | Block Group 3, Census Tract 6.01, Victoria County, Texas | 55.8% |
| 484690006021 | Block Group 1, Census Tract 6.02, Victoria County, Texas | 62.9% |
| 484690006022 | Block Group 2, Census Tract 6.02, Victoria County, Texas | 38.0% |
| 484690006023 | Block Group 3, Census Tract 6.02, Victoria County, Texas | 23.3% |
| 484690006024 | Block Group 4, Census Tract 6.02, Victoria County, Texas | 79.5% |
| 484690007001 | Block Group 1, Census Tract 7, Victoria County, Texas | 53.2% |
| 484690007002 | Block Group 2, Census Tract 7, Victoria County, Texas | 46.7% |
| 484690007003 | Block Group 3, Census Tract 7, Victoria County, Texas | 35.0% |
| 484690008001 | Block Group 1, Census Tract 8, Victoria County, Texas | 23.7% |
| 484690008002 | Block Group 2, Census Tract 8, Victoria County, Texas | 33.1% |
| 484690013001 | Block Group 1, Census Tract 13, Victoria County, Texas | 36.4% |
| 484690013002 | Block Group 2, Census Tract 13, Victoria County, Texas | 45.1% |
| 484690014001 | Block Group 1, Census Tract 14, Victoria County, Texas | 29.1% |
| 484690014002 | Block Group 2, Census Tract 14, Victoria County, Texas | 28.4% |
| 484690014003 | Block Group 3, Census Tract 14, Victoria County, Texas | 28.1% |
| 484690014004 | Block Group 4, Census Tract 14, Victoria County, Texas | 15.4% |
| 484690015011 | Block Group 1, Census Tract 15.01, Victoria County, Texas | 22.5% |
| 484690015012 | Block Group 2, Census Tract 15.01, Victoria County, Texas | 12.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484690015013 | Block Group 3, Census Tract 15.01, Victoria County, Texas | 18.3% |
| 484690015031 | Block Group 1, Census Tract 15.03, Victoria County, Texas | 14.8% |
| 484690015032 | Block Group 2, Census Tract 15.03, Victoria County, Texas | 0.0% |
| 484690015041 | Block Group 1, Census Tract 15.04, Victoria County, Texas | 18.8% |
| 484690015042 | Block Group 2, Census Tract 15.04, Victoria County, Texas | 24.7% |
| 484690015043 | Block Group 3, Census Tract 15.04, Victoria County, Texas | 13.5% |
| 484690016011 | Block Group 1, Census Tract 16.01, Victoria County, Texas | 65.9% |
| 484690016012 | Block Group 2, Census Tract 16.01, Victoria County, Texas | 17.2% |
| 484690016013 | Block Group 3, Census Tract 16.01, Victoria County, Texas | 14.0% |
| 484690016014 | Block Group 4, Census Tract 16.01, Victoria County, Texas | 61.2% |
| 484690016041 | Block Group 1, Census Tract 16.04, Victoria County, Texas | 52.5% |
| 484690016042 | Block Group 2, Census Tract 16.04, Victoria County, Texas | 13.9% |
| 484690016043 | Block Group 3, Census Tract 16.04, Victoria County, Texas | 47.7% |
| 484690016051 | Block Group 1, Census Tract 16.05, Victoria County, Texas | 21.0% |
| 484690016052 | Block Group 2, Census Tract 16.05, Victoria County, Texas | 40.8% |
| 484690016053 | Block Group 3, Census Tract 16.05, Victoria County, Texas | 57.7% |
| 484690016061 | Block Group 1, Census Tract 16.06, Victoria County, Texas | 10.4% |
| 484690016062 | Block Group 2, Census Tract 16.06, Victoria County, Texas | 32.6% |
| 484690016063 | Block Group 3, Census Tract 16.06, Victoria County, Texas | 11.5% |
| 484690016064 | Block Group 4, Census Tract 16.06, Victoria County, Texas | 4.0% |
| 484690017001 | Block Group 1, Census Tract 17, Victoria County, Texas | 32.9% |
| 484690017002 | Block Group 2, Census Tract 17, Victoria County, Texas | 18.6% |
| 484690017003 | Block Group 3, Census Tract 17, Victoria County, Texas | 74.4% |
| 484690017004 | Block Group 4, Census Tract 17, Victoria County, Texas | 47.7% |
| 484699800001 | Block Group 1, Census Tract 9800, Victoria County, Texas | 0.0% |
| 484717901011 | Block Group 1, Census Tract 7901.01, Walker County, Texas | 73.7% |
| 484717901012 | Block Group 2, Census Tract 7901.01, Walker County, Texas | 0.0% |
| 484717901013 | Block Group 3, Census Tract 7901.01, Walker County, Texas | 34.3% |
| 484717901021 | Block Group 1, Census Tract 7901.02, Walker County, Texas | 48.5% |
| 484717901022 | Block Group 2, Census Tract 7901.02, Walker County, Texas | 27.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484717901031 | Block Group 1, Census Tract 7901.03, Walker County, Texas | 27.7% |
| 484717901032 | Block Group 2, Census Tract 7901.03, Walker County, Texas | 33.5% |
| 484717901033 | Block Group 3, Census Tract 7901.03, Walker County, Texas | 45.7% |
| 484717902001 | Block Group 1, Census Tract 7902, Walker County, Texas | 28.4% |
| 484717902002 | Block Group 2, Census Tract 7902, Walker County, Texas | 67.2% |
| 484717902003 | Block Group 3, Census Tract 7902, Walker County, Texas | 25.2% |
| 484717902004 | Block Group 4, Census Tract 7902, Walker County, Texas | 36.2% |
| 484717902005 | Block Group 5, Census Tract 7902, Walker County, Texas | 35.5% |
| 484717903001 | Block Group 1, Census Tract 7903, Walker County, Texas | 39.8% |
| 484717903002 | Block Group 2, Census Tract 7903, Walker County, Texas | 50.0% |
| 484717903003 | Block Group 3, Census Tract 7903, Walker County, Texas | 19.2% |
| 484717903004 | Block Group 4, Census Tract 7903, Walker County, Texas | 25.8% |
| 484717903005 | Block Group 5, Census Tract 7903, Walker County, Texas | 11.6% |
| 484717904001 | Block Group 1, Census Tract 7904, Walker County, Texas | 54.7% |
| 484717904002 | Block Group 2, Census Tract 7904, Walker County, Texas | 0.0% |
| 484717904003 | Block Group 3, Census Tract 7904, Walker County, Texas | 0.0% |
| 484717904004 | Block Group 4, Census Tract 7904, Walker County, Texas | 32.4% |
| 484717905001 | Block Group 1, Census Tract 7905, Walker County, Texas | 100.0% |
| 484717905002 | Block Group 2, Census Tract 7905, Walker County, Texas | 66.9% |
| 484717905003 | Block Group 3, Census Tract 7905, Walker County, Texas | 38.7% |
| 484717905004 | Block Group 4, Census Tract 7905, Walker County, Texas | 31.9% |
| 484717906001 | Block Group 1, Census Tract 7906, Walker County, Texas | 81.4% |
| 484717906002 | Block Group 2, Census Tract 7906, Walker County, Texas | 68.4% |
| 484717906003 | Block Group 3, Census Tract 7906, Walker County, Texas | 0.0% |
| 484717906004 | Block Group 4, Census Tract 7906, Walker County, Texas | 84.6% |
| 484717907001 | Block Group 1, Census Tract 7907, Walker County, Texas | 64.3% |
| 484717907002 | Block Group 2, Census Tract 7907, Walker County, Texas | 90.9% |
| 484717907003 | Block Group 3, Census Tract 7907, Walker County, Texas | 77.8% |
| 484717907004 | Block Group 4, Census Tract 7907, Walker County, Texas | 35.4% |
| 484717908001 | Block Group 1, Census Tract 7908, Walker County, Texas | 100.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484717908002 | Block Group 2, Census Tract 7908, Walker County, Texas | 84.7% |
| 484717908003 | Block Group 3, Census Tract 7908, Walker County, Texas | 47.9% |
| 484717908004 | Block Group 4, Census Tract 7908, Walker County, Texas | 30.7% |
| 484736801001 | Block Group 1, Census Tract 6801, Waller County, Texas | 25.9% |
| 484736802001 | Block Group 1, Census Tract 6802, Waller County, Texas | 48.3% |
| 484736802002 | Block Group 2, Census Tract 6802, Waller County, Texas | 48.5% |
| 484736802003 | Block Group 3, Census Tract 6802, Waller County, Texas | 58.0% |
| 484736802004 | Block Group 4, Census Tract 6802, Waller County, Texas | 65.4% |
| 484736803001 | Block Group 1, Census Tract 6803, Waller County, Texas | 24.8% |
| 484736803002 | Block Group 2, Census Tract 6803, Waller County, Texas | 62.7% |
| 484736803003 | Block Group 3, Census Tract 6803, Waller County, Texas | 52.9% |
| 484736803004 | Block Group 4, Census Tract 6803, Waller County, Texas | 33.0% |
| 484736803005 | Block Group 5, Census Tract 6803, Waller County, Texas | 81.2% |
| 484736804001 | Block Group 1, Census Tract 6804, Waller County, Texas | 0.0% |
| 484736805001 | Block Group 1, Census Tract 6805, Waller County, Texas | 43.0% |
| 484736805002 | Block Group 2, Census Tract 6805, Waller County, Texas | 56.2% |
| 484736805003 | Block Group 3, Census Tract 6805, Waller County, Texas | 63.4% |
| 484736805004 | Block Group 4, Census Tract 6805, Waller County, Texas | 62.8% |
| 484736805005 | Block Group 5, Census Tract 6805, Waller County, Texas | 46.4% |
| 484736806001 | Block Group 1, Census Tract 6806, Waller County, Texas | 49.2% |
| 484736806002 | Block Group 2, Census Tract 6806, Waller County, Texas | 36.6% |
| 484736806003 | Block Group 3, Census Tract 6806, Waller County, Texas | 29.6% |
| 484771701001 | Block Group 1, Census Tract 1701, Washington County, Texas | 63.1% |
| 484771701002 | Block Group 2, Census Tract 1701, Washington County, Texas | 60.6% |
| 484771701003 | Block Group 3, Census Tract 1701, Washington County, Texas | 25.2% |
| 484771702001 | Block Group 1, Census Tract 1702, Washington County, Texas | 80.0% |
| 484771702002 | Block Group 2, Census Tract 1702, Washington County, Texas | 59.7% |
| 484771702003 | Block Group 3, Census Tract 1702, Washington County, Texas | 62.7% |
| 484771702004 | Block Group 4, Census Tract 1702, Washington County, Texas | 23.6% |
| 484771703001 | Block Group 1, Census Tract 1703, Washington County, Texas | 42.8% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484771703002 | Block Group 2, Census Tract 1703, Washington County, Texas | 25.9% |
| 484771703003 | Block Group 3, Census Tract 1703, Washington County, Texas | 65.0% |
| 484771704001 | Block Group 1, Census Tract 1704, Washington County, Texas | 92.2% |
| 484771704002 | Block Group 2, Census Tract 1704, Washington County, Texas | 39.2% |
| 484771704003 | Block Group 3, Census Tract 1704, Washington County, Texas | 26.0% |
| 484771704004 | Block Group 4, Census Tract 1704, Washington County, Texas | 39.7% |
| 484771705001 | Block Group 1, Census Tract 1705, Washington County, Texas | 43.7% |
| 484771705002 | Block Group 2, Census Tract 1705, Washington County, Texas | 16.9% |
| 484771705003 | Block Group 3, Census Tract 1705, Washington County, Texas | 55.1% |
| 484771705004 | Block Group 4, Census Tract 1705, Washington County, Texas | 32.5% |
| 484771705005 | Block Group 5, Census Tract 1705, Washington County, Texas | 45.6% |
| 484771705006 | Block Group 6, Census Tract 1705, Washington County, Texas | 21.9% |
| 484771706001 | Block Group 1, Census Tract 1706, Washington County, Texas | 55.7% |
| 484771706002 | Block Group 2, Census Tract 1706, Washington County, Texas | 37.5% |
| 484771706003 | Block Group 3, Census Tract 1706, Washington County, Texas | 50.9% |
| 484771706004 | Block Group 4, Census Tract 1706, Washington County, Texas | 25.7% |
| 484817401001 | Block Group 1, Census Tract 7401, Wharton County, Texas | 30.9% |
| 484817401002 | Block Group 2, Census Tract 7401, Wharton County, Texas | 31.0% |
| 484817401003 | Block Group 3, Census Tract 7401, Wharton County, Texas | 20.2% |
| 484817401004 | Block Group 4, Census Tract 7401, Wharton County, Texas | 36.6% |
| 484817401005 | Block Group 5, Census Tract 7401, Wharton County, Texas | 26.8% |
| 484817402001 | Block Group 1, Census Tract 7402, Wharton County, Texas | 53.3% |
| 484817402002 | Block Group 2, Census Tract 7402, Wharton County, Texas | 54.5% |
| 484817403001 | Block Group 1, Census Tract 7403, Wharton County, Texas | 59.7% |
| 484817403002 | Block Group 2, Census Tract 7403, Wharton County, Texas | 16.1% |
| 484817404001 | Block Group 1, Census Tract 7404, Wharton County, Texas | 28.5% |
| 484817404002 | Block Group 2, Census Tract 7404, Wharton County, Texas | 42.9% |
| 484817404003 | Block Group 3, Census Tract 7404, Wharton County, Texas | 65.9% |
| 484817404004 | Block Group 4, Census Tract 7404, Wharton County, Texas | 53.5% |
| 484817404005 | Block Group 5, Census Tract 7404, Wharton County, Texas | 37.0% |

| FIPS Code | Block Group | Percent of Block Group Low or Moderate Income |
|---|---|---|
| 484817404006 | Block Group 6, Census Tract 7404, Wharton County, Texas | 33.9% |
| 484817405001 | Block Group 1, Census Tract 7405, Wharton County, Texas | 41.0% |
| 484817405002 | Block Group 2, Census Tract 7405, Wharton County, Texas | 69.7% |
| 484817406001 | Block Group 1, Census Tract 7406, Wharton County, Texas | 47.3% |
| 484817406002 | Block Group 2, Census Tract 7406, Wharton County, Texas | 44.2% |
| 484817406003 | Block Group 3, Census Tract 7406, Wharton County, Texas | 42.8% |
| 484817407001 | Block Group 1, Census Tract 7407, Wharton County, Texas | 56.6% |
| 484817408001 | Block Group 1, Census Tract 7408, Wharton County, Texas | 28.2% |
| 484817408002 | Block Group 2, Census Tract 7408, Wharton County, Texas | 44.2% |
| 484817408003 | Block Group 3, Census Tract 7408, Wharton County, Texas | 57.2% |
| 484817409001 | Block Group 1, Census Tract 7409, Wharton County, Texas | 41.6% |
| 484817409002 | Block Group 2, Census Tract 7409, Wharton County, Texas | 45.9% |
| 484817409003 | Block Group 3, Census Tract 7409, Wharton County, Texas | 13.6% |
| 484817409004 | Block Group 4, Census Tract 7409, Wharton County, Texas | 10.6% |
| 484817409005 | Block Group 5, Census Tract 7409, Wharton County, Texas | 23.8% |
| 484817410001 | Block Group 1, Census Tract 7410, Wharton County, Texas | 77.0% |
| 484817410002 | Block Group 2, Census Tract 7410, Wharton County, Texas | 54.6% |
| 484817410003 | Block Group 3, Census Tract 7410, Wharton County, Texas | 26.1% |
| 484817410004 | Block Group 4, Census Tract 7410, Wharton County, Texas | 34.5% |
| 484817411001 | Block Group 1, Census Tract 7411, Wharton County, Texas | 35.5% |
| 484817411002 | Block Group 2, Census Tract 7411, Wharton County, Texas | 28.4% |

Source: United States Department of Housing and Urban Development, Low and Moderate Income Summary Data, 2017.

# Appendix F - Table of Figures

The Community Development Block Grant Disaster Recovery Program (CDBG-DR) is conducted by the U.S. Department of Housing and Urban Development (HUD) and the Texas General Land Office's Community Development and Revitalization Program Office (GLO-CDR). The CDBG-DR Program was designed to aid cities, counties, and States in their recovery from Presidentially declared disasters by creating policies and procedures for to govern the administration of federal funding allocated via special Congressional appropriations.  The overall funding process and timeline is presented below.

The following map identifies census block groups that have low- and moderate-income population of 51 percent or more for the 49 eligible counties using HUD's 2017 Low- and Moderate-Income Summary Data (LMISD) for the state of Texas.

# Appendix G - Early Public Input and Consultation

Several groups provided early consultation on the direction the 2024 AI should take and what it should include. Comment was received by email, physical mail, and by use of an electronic web form. This appendix includes those consultations verbatim. Some commenters using the web form were requesting housing assistance. These comments are not included to protect the identity and privacy of individuals who were not making comment on an official document. Any requests for housing assistance were responded to immediately using the same methods that TDHCA employs when Texans utilize the info@tdhca.texas.gov email, call, or use the Help For Texans website.

| Organization | Please provide any input on what the State of Texas should include or exclude in the 2024 Analysis of Impediments to Fair Housing Choice, or any other comment related to the 2024 Analysis of Imped... | Group Type | Reviewed 2019 Document Prior to Comment |
|---|---|---|---|
| Caritas of Austin | The state of Texas needs to review laws and guidance pertaining to inequitable tenant criminal history requirements and property management discrimination in refusal to accept housing vouchers or working with housing programs. | Non-profit or advocacy organization | Yes |
| Austin ECHO | The state of Texas needs to review laws and guidance pertaining to inequitable tenant criminal history requirements and property management discrimination in refusal to accept housing vouchers or working with housing programs. | Non-profit or advocacy organization | Yes |
| Not Listed | Texas truly needs to address the following list of concerns: renter's rights, racial inequities in housing and systems related to obtaining and/or maintaining housing, rental caps for those on fixed incomes, stronger incentives for 30 and 50% AMI inclusion in economically stronger cities to better serve the community needs and allow those who are the "working poor" and support structure of those communities to live within the city's limits | Non-profit or advocacy organization | No, but I plan to review it before commenting |
| Caritas of Austin | The state of Texas needs to review laws and guidance pertaining to inequitable tenant criminal history requirements and property management discrimination in refusal to accept housing vouchers or working with housing programs. | Non-profit or advocacy organization | Yes |
| Disability Rights Texas | •Accessible housing is more than physical modifications – True accessibility includes, but is not limited to, affordability, appropriate and accessible transportation to job centers and services, accessibility to schools, etc. It includes accessible forms of communication, and all other things necessary for a person with a disability to enjoy their dwelling just as anybody else would.<br>•Lack of affordable housing units – There are not enough units being developed specifically for low income individuals, including people with disabilities. Research indicates that the biggest need for housing units in Texas is for extremely low income tenants at 30% or below AMI; there is currently only 1 unit available for every 4 households that need one (National Low Income Housing Coalition). Until housing development is geared toward actual need, people with disabilities who rely on disability-related income, or work frontline jobs, will continue to experience high rates of housing instability.<br>•Lack of service navigators and caseworkers – DRTx provides a variety of housing-related assistance and resources to people with disabilities across Texas. However, we are receiving more and more calls regarding situations that could have been avoided had there been someone to assist our client with housing systems navigation. The state consistently underpays personal attendants and other direct care staff, resulting in shortages that dramatically impact the housing stability of our clients. For example, a person in crisis may not be able to make small corrections to paperwork they made weeks ago to maintain a voucher, which can cause a person to decompensate further. We are seeing more and more clients experiencing mental illness, and without case management, it can be very difficult for them to remain stably housed. The resources and accommodations we provide our clients would be far more effective, especially long term, if there were enough professionals available to guide people through these complex processes.<br>•Lack of training and education – There is a significant lack of understanding amongst landlords and property owners about what disability actually is, and what their responsibilities are under the Fair Housing Act and the Americans with Disabilities Act. Many think disability starts and ends with physical limitations, and take a one-size-fits-all approach to housing accommodations. Landlords and property managers do not understand how to interact with people with disabilities, how to recognize symptoms vs. manifestations, or how to de-escalate a situation. This lack of education leads to negative housing outcomes specifically for people with disabilities. These things could be alleviated by requiring landlords participating in relevant housing programs to receive comprehensive education and training about disability. This would undoubtedly improve housing outcomes for people with disabilities, and landlords and property owners alike.<br>•Source of Income (SOI) discrimination – Source of Income (SOI) discrimination is not only voucher discrimination but, in the case of some people with disabilities, discrimination against disability-related income like social security. We understand that the Texas Legislature has explicitly allowed this practice. However, that does not make it any less of an impediment to people with disabilities achieving housing stability, or being fairly treated when it comes to securing a place to live.<br>•Landlord discrimination – Landlord discrimination goes beyond source of income: it can also be disability-specific. We often see discrimination based solely on a suspected disability, especially a mental illness or something specific to a child (ie autism). We have even seen landlords intentionally triggering clients to give them cause to evict. As long as landlords are permitted to discriminate against people without cause, people with disabilities will continue to suffer when it comes to housing. | Non-profit or advocacy organization | Yes |
| City of Soccorro | The AI is 994 pages long. This, in and of itself, is an impediment for small organizations, (NGOs, small towns, etc), with limited resources, staff, and time, but still tasked with advocacy for fair housing. | Local government | Yes |
| Inclusive Communities Project | The Inclusive Communities Project submitted an early comment on the 2024 Analysis of Impediments by email to fair.housing@tdhca.state.tx.us on November 30, 2023. | Non-profit or advocacy organization | Yes |

**Disability RIGHTS TEXAS**

Protecting and advocating for the rights of Texans with disabilities – because all people have dignity and worth.

## Disability Rights Texas Comments re: Analysis of Impediments
## October 31, 2023

**Please provide any input on what the State of Texas should include or exclude in the 2024 Analysis of Impediments to Fair Housing Choice, or any other comment related to the 2024 Analysis of Impediments.**

- **Accessible housing is more than physical modifications** – True accessibility includes, but is not limited to, affordability, appropriate and accessible transportation to job centers and services, accessibility to schools, etc. It includes accessible forms of communication, and all other things necessary for a person with a disability to enjoy their dwelling just as anybody else would.

- **Lack of affordable housing units** – There are not enough units being developed *specifically* for low income individuals, including people with disabilities. Research indicates that the biggest need for housing units in Texas is for extremely low income tenants at 30% or below AMI; there is currently only 1 unit available for every 4 households that need one (National Low Income Housing Coalition). Until housing development is geared toward actual need, people with disabilities who rely on disability-related income, or work frontline jobs, will continue to experience high rates of housing instability.

- **Lack of service navigators and caseworkers** – DRTx provides a variety of housing-related assistance and resources to people with disabilities across Texas. However, we are receiving more and more calls regarding situations that could have been avoided had there been someone to assist our client with housing systems navigation. The state consistently underpays personal attendants and other direct care staff, resulting in shortages that dramatically impact the housing stability of our clients. For example, a person in crisis may not be able to make small corrections to paperwork they made weeks ago to maintain a voucher, which can cause a person to decompensate further. We are seeing more and more clients experiencing mental illness, and without case management, it can be very difficult for them to remain stably housed. The resources and accommodations we provide our clients would be far more effective, especially long term, if there were enough professionals available to guide people through these complex processes.

- **Lack of training and education** – There is a significant lack of understanding amongst landlords and property owners about what disability actually is, and what their responsibilities are under the Fair Housing Act and the Americans with Disabilities Act. Many think disability starts and ends with physical limitations, and take a one-size-fits-all approach to housing accommodations. Landlords and property managers do not understand how to interact with people with disabilities, how to recognize symptoms vs. manifestations, or how to de-escalate a situation. This lack of education leads to negative housing outcomes specifically for people with disabilities. These things could be alleviated by requiring landlords participating in relevant housing programs to receive comprehensive education and training about disability. This would undoubtedly improve housing outcomes for people with disabilities, and landlords and property owners alike.

- **Source of Income (SOI) discrimination** – Source of Income (SOI) discrimination is not only voucher discrimination but, in the case of some people with disabilities, discrimination against disability-related income like social security. We understand that the Texas Legislature has explicitly allowed this practice. However, that does not make it any less of an impediment to people with disabilities achieving housing stability, or being fairly treated when it comes to securing a place to live.

- **Landlord discrimination** – Landlord discrimination goes beyond source of income: it can also be disability-specific. We often see discrimination based solely on a suspected disability, especially a mental illness or something specific to a child (ie autism). We have even seen landlords intentionally triggering clients to give them cause to evict. As long as landlords are permitted to discriminate against people without cause, people with disabilities will continue to suffer when it comes to housing.

- **Homeowner's Associations (HOA)** – There is clear evidence of Texas HOAs discriminating against people with disabilities, and racial/ethnic/religious minorities. This is illegal under the ADA; however, HOAs still do this to promulgate the Not in my Backyard (NIMBY) policies. A well-documented example of HOA discrimination is the Providence Village HOA which, after an illicit board meeting, prohibited their members from accepting vouchers, or risk harsh fines. Legislation was passed by the 88th Legislature to prevent HOAs from prohibiting landlords from choosing to rent to voucher holders, but it does not extend any protections specifically to tenants.

- **Land use restrictions** – It is common practice across the state to utilize land use restrictions to prevent certain types of housing from being developed in certain areas. Even the U.S. Supreme Court recognized that land use restrictions are at the "heartland" of fair housing discrimination. These practices discriminate against people with disabilities, such as requiring onerous fire-safety measures under the guise of discriminatory paternalism and protectionism, as well as requiring spacing rules that no other single-family resident homes would be required to follow. For example, in Grand Prairie a single-family home is designated as a home with up to six unrelated persons living together, and there are no limitations on distance from other types of dwellings. However, a registered group home with the State of Texas or an "alcoholic/drug care home," more appropriately known as a recovery home, cannot be within 2,500 ft. of another group living facility, regardless of type. This is overtly discriminatory against people in substance use recovery. Similar NIMBY-related efforts were attempted by state politicians in 2021 in North Austin in an attempt to prevent the city from transitioning an old hotel into permanent supportive housing (PSH) for people experiencing homelessness. Policymakers attempted to stop all PSH development by doing things like creating onerous paperwork requirements and soliciting public input, things that are not required for any other kind of development. People with disabilities make up a disproportionate percentage of the population of people experiencing homelessness, and the NIMBY effort in North Austin is another clear example of housing discrimination against people with disabilities.

- **Criminal history** – Criminal histories that have a direct connection to a person's disability are another barrier to individuals with disabilities securing affordable and accessible housing. There are times when it is necessary and required that criminal background histories must be accommodated and waived as the criminal history is a direct result of a person's disability. Most often, these situations can be seen in the area of mental impairment disabilities, such as substance use disorder (SUD). For example, a person with SUD could have long ago possession charges that no longer reflect on the individual's qualifications as a tenant: such charges were a direct result of the individual's addiction and substance use disorder, and the individual is now in long-term recovery from substance use. Other mental diagnoses may have caused a temporary decompensation leading to charges, and the tenant has since undergone rehabilitation, or there are other accommodations in place that will mitigate prior offences (directly resulting from that person's disability) from re-occurring. Penalizing a person with a disability by denying them housing after they have already served time is a disability-discriminatory penalty that only further makes housing unavailable completely on the basis of disability.

- **Limitations on city governments from enacting community-specific housing supports** - The 88th Legislature enacted HB 2127 to prevent local governments from enacting ordinances to benefit their own citizens. This legislation has a direct and disparate impact on people with disabilities, especially with regard to housing, because it invalidates previously enacted ordinances providing eviction protections. It is not uncommon for people with disabilities to fall behind on rent due to situations out of their control, including costly health-related complications, hospitalizations or needing to care for a sick family member. City eviction prevention ordinances protected people with disabilities in situations like these: they don't anymore.

- **Equal opportunity education** – Families with school-aged children receiving special education services want to live near a school that is able to provide the services their child needs. We have clients that reach out for help because they do not want to move since their child requires services that only a specific school offers. Situations like this put people with disabilities at a higher risk of eviction, and exemplify the need for affordable housing in areas with good schools.

**This early consultation is also part of the early input process for the State of Texas 5-year Consolidated Plan. Please provide any input you may have on how the state should handle the Consolidated Plan.**

This question is unclear because the term "handle" is confusing. But in general, soliciting feedback from as many people and groups as possible is the best way to develop the Consolidated Plan. Creative, accessible outreach to a wide variety of stakeholders is key. The Fair Housing Act should be the floor when it comes to the Consolidated Plan, and TDHCA should aim to go beyond what is required by federal law. Housing stability services should be prioritized in any plan that is developed.

Please contact Tanya Lavelle with any questions at tlavelle@drtx.org

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November 30, 2023


Email to fair.housing@tdhca.state.tx.us

TDHCA, Fair Housing,
 c/o Housing Resource Center,
P.O. BOX 13941
Austin, TX 78711-3941

Re: ICP early input comment - 2024 State of Texas Analysis of Impediments to Fair Housing Choice Early Input

To: TDHCA, Fair Housing

   This early input comment involves the State and the Texas Department of Housing and Community Affairs (TDHCA) beginning work on drafting the 2024 Analysis of Impediments to Fair Housing Choice (AI), which guides the state's affordable housing strategy. This preliminary comment is filed on behalf of the Inclusive Communities Project (ICP).

   ICP is a fair housing and civil rights organization in Dallas, Texas. ICP helps Dallas-area families with Section 8 Housing Choice Vouchers secure housing opportunities in non-racially concentrated, low poverty, safe neighborhoods with adequate resources. For over fifteen years, ICP has assisted thousands of federal Housing Choice Voucher holders locate desegregated housing in non-racially concentrated neighborhoods in the Dallas area. Because Low-Income Housing Tax Credit (LIHTC) housing projects cannot deny voucher tenants housing because they have a voucher, LIHTC housing is an important source of housing for voucher families.[1] ICP relies on LIHTC units to assist its voucher clients find housing in opportunity areas, and ICP also assists owners and developers of LIHTC housing with making units available to ICP voucher clients outside of racially concentrated areas.

   ICP is submitting this comment to TDHCA because of ICP's concerns with using TDHCA's 2019 AI as a basis for the new 2024 AI. In particular, HUD's affirmatively furthering fair housing (AFFH) regulation has changed since 2019, and those changes must govern the State and TDHCA's new 2024 AI. HUD has restored significant elements and definitions of the 2015 HUD AFFH rule with the 2021 HUD AFFH regulation. While HUD does not require an AI or Fair Housing Assessment to be prepared, the 2021 HUD AFFH regulation does require the State

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[1] *See,* 26 U.S.C. § 42(h)(6)(B)(iv).

(through TDHCA) to certify that since the State receives federal housing funds it is complying with its obligation to affirmatively furthering fair housing in all of its housing and urban development programs. This is required by the restored HUD regulation. 86 FR 30779-01. Importantly, this certification requires the State and TDHCA to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. In addition, the 2021 HUD AFFH regulation explains that "the duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development." 86 FR 30779-01; 24 C.F.R. § 5.151.

Because the current 2021 HUD AFFH rule requires TDHCA to affirmatively further fair housing in all of TDHCA's activities and programs relating to housing and urban development, TDHCA is required to examine the patterns of racial segregation in TDHCA's LIHTC program as part of the 2024 AI. 86 FR 30779-01; 24 C.F.R. § 5.151. This will require TDHCA to draft a significantly different AI for 2024 than the TDHCA 2019 AI. The 2019 AI did not examine all of TDHCA's activities and programs relating to housing and urban development and adopted the narrow scope defined by HUD funded housing programs.

ICP's comment focuses on the existing patterns of racial segregation in the location of LIHTC projects in the metropolitan areas of the State and the TDHCA policies that must be examined that are impediments to the remedying of that segregation. The State and TDHCA cannot contest that the LIHTC program is a state activity and program relating to housing and urban development. 24 C.F.R. § 5.151 Without taking meaningful actions to address the segregation in the LIHTC program and the policies impacting that segregation, TDHCA's certification with the 2024 AI will not meet the requirements of HUD's 2021 AFFH rule.

**Both HUD and the IRS require the duty to affirmatively further fair housing to extend to the TDHCA LIHTC program.**

As set out above, HUD's current AFFH rule extends the duty to affirmatively further fair housing to all of the State's activities and programs relating to housing. TDHCA has the duty to affirmatively further fair housing with respect to the State's LIHTC program. 86 FR 30779-01; 24 C.F.R. § 5.151. As such, TDHCA's current position in the 2019 AI that the LIHTC program is not subject to the AFFH rule is without legal support.[2]

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[2] The 2019 TDHCA AI incorrectly states:

> "It should be noted as well that the majority of program funds received by TDHCA are not HUD CPD funds and are not subject to the Affirmatively Furthering Fair Housing (AFFH) rule. The single largest program in terms of affordable rental housing that TDHCA oversees is the Low-Income Housing Tax Credit (LIHTC) Program, which is not funded through HUD's CPD appropriation to the State." 2019 TDHCA AI, pdf page 484.

In addition, the Internal Revenue Service (IRS) has ruled that the operation of the LIHTC program by state allocation agencies is covered by the affirmatively further fair housing obligation of the Fair Housing Act. The federal agency responsible for the federal administration of the LIHTC program is the U.S. Treasury Department which includes IRS. 26 U.S.C. § 42(n). The IRS ruling states:

> AFFH was firmly established Federal housing policy when § 42 was enacted, and there is no suggestion that Congress intended § 42 to diverge from that policy. Section 42(m)(1)(A)(ii), therefore, does not require or even encourage conduct inconsistent with that policy. IRS Revenue Ruling 2016-29, page 6.

TDHCA's 2019 AI position that affirmatively furthering fair housing applies only to TDHCA programs with HUD funding is contradicted by this IRS ruling. Treasury and IRS have their own obligation to affirmatively further fair housing in the Fair Housing Act,[3] and this Revenue Ruling is part of IRS administration of a Treasury housing program, LIHTC. As stated by the IRS, the LIHTC program is covered by the obligation to affirmatively further fair housing. IRS Revenue Ruling 2016-29, page 6.

TDHCA's 2019 AI fails to take into account the 2016 IRS Revenue Ruling and the duty to affirmatively further fair housing in the State's LIHTC program.

The duty to affirmatively further fair housing in the LIHTC program is also covered by the new AFFH rule proposed by HUD in 2023. The HUD proposed AFFH rule planning and action requirements apply to the allocation plans and policies of the State's LIHTC program. 88 FR 8516, at 8559, 8561, 8582.

TDHCA's 2024 AI must incorporate the analysis of the LIHTC program to be compliant with HUD's current 2021 AFFH rule and the IRS Revenue Ruling. Given the longstanding existing racially segregated location of the majority of the LIHTC projects in the major metropolitan areas of the State, TDHCA must examine its policies and practices that fail to affirmatively further fair housing in the LIHTC program.

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[3] The Fair Housing Act states:

> All executive departments and agencies shall administer their programs and activities relating to housing and urban development (including any Federal agency having regulatory or supervisory authority over financial institutions) in a manner affirmatively to further the purposes of this subchapter and shall cooperate with the Secretary to further such purposes. 42 U.S.C.§ 3608 (d).

The Treasury Department has regulatory and supervisory authority over financial institutions, including national bank investment and ownership of LIHTC projects. The Treasury Department's IRS has supervisory authority over the state administration of LIHTC programs.

**The standard for AFFH for TDHCA's certification is set out in HUD's current 2021 AFFH rule.**

TDHCA is required to meet the standards and definitions set by HUD's current 2021 AFFH rule in order to comply with its AFFH obligation.

> Affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development. 24 C.F.R. §5.150.

HUD states that "the AFFH mandate requires consideration of the effect of its policies on the racial and socioeconomic composition of the surrounding area. *Thompson*, 348. F. Supp. 2d at 409." 86 FR 30779-01. HUD and the courts require efforts to decrease segregation and promote integration. *Id*.

Other definitions in the restored 2015 HUD rule are in effect per the 2021 HUD AFFH rule. These definitions include the following:

> "Segregation means a condition, within the program participant's geographic area of analysis, in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area..."

> "Integration means a condition, within the program participant's geographic area of analysis, in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area…."

> "Fair housing choice means that individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability. Fair housing choice encompasses: (1) Actual choice, which means the existence of realistic housing options…."

> "Significant disparities in access to opportunity means substantial and measurable differences in access to educational, transportation, economic, and other important opportunities in a community, based on protected class related to housing."

"Racially or ethnically concentrated area of poverty means a geographic area with significant concentrations of poverty and minority populations." 24 C.F.R. §5.151.

HUD's current 2021 AFFH rule requires the State to take meaningful actions which are defined in the rule, "Meaningful actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity." 24 C.F.R. §5.151.

These standards apply to all of TDHCA's housing programs and are what TDHCA must apply to its LIHTC program in the 2024 AI. TDHCA must examine the impact of its LIHTC allocations on segregation and on fair housing choice in the 2024 AI and take meaningful actions to increase fair housing choice and decrease disparities in access to opportunity.

**The LIHTC projects in metropolitan areas are overwhelmingly located in racially and ethnically concentrated neighborhoods.**

The facts show that the LIHTC projects are disproportionately and overwhelmingly located in Black and Hispanic neighborhoods of the State's major cities thus limiting fair housing choice for affordable housing tenants. As such, TDHCA's 2024 AI must examine the LIHTC project locations that are overwhelmingly located in Black and Hispanic neighborhoods in the major Texas cities.

The following racial distribution of the LIHTC projects on the TDHCA 2023 HTC Inventory[4] is an example of the data that compliance with the Affirmatively Furthering Fair Housing certification should be taken into account on both individual allocation and LIHTC policy decisions. The data is for five large Texas cities with substantial numbers of LIHTC projects and units. The attached Exhibit 1 contains the table for each of these five cities showing the distribution of all LIHTC projects and units on the current 2023 HTC inventory compared to the distribution of showing an allocation between 2016-2023.

A summary of the changes in Total LIHTC Units distributions shows the persistence of the racial segregation under the annual QAPs and allocation decisions:

Dallas % of Total Units in less than 50% White tracts total 2023 inventory 94.6%.
Dallas % of Total Units in less than 50% White tracts total 2016-2023      93.6%.

Houston % of Total Units in less than 50% White tracts total 2023 inventory 96.2%.
Houston % of Total Units in less than 50% White tracts total 2016-2023      94.4%.

Fort Worth % of Total Units in less than 50% White tracts total 2023 inventory 78.9%.

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[4] HTC Property Inventory (properties by city tab added) (XLSX) as of October 30, 2023, at
https://www.tdhca.state.tx.us/multifamily/apply-for-funds.htm

Fort Worth % of Total Units in less than 50% White tracts total 2016-2023      76.3%.

Austin % of Total Units in less than 50% White tracts total 2023 inventory 86.3%.
Austin % of Total Units in less than 50% White tracts total 2016-2023      86.9%.

San Antonio % of Total Units in less than 50% White tracts total 2023 inventory 99.4%.
San Antonio % of Total Units in less than 50% White tracts total 2016-2023      98.8%.


This segregation of the state's LIHTC units and projects in the major Texas' cities must be analyzed in the 2024 AI and meaningful actions taken to increase fair housing choice for Texans. The data shows the segregation has increased and TDHCA must examine the policies and practices that are affecting that result.

The LIHTC segregation was recognized by the State nearly 17 years ago in a 2006 Texas House of Representatives report. The clustering of LIHTC projects in racial and ethnic neighborhoods in the State's major urban areas has continued despite the 2006 Texas House Committee on Urban Affairs report (2006 HUAC report) findings that TDHCA's funding allocations were perpetuating racial and poverty concentrations in Texas metropolitan areas. The 2006 HUAC report found:

> "The Department's funding allocations, as well as the allocations under the Bond Review Board's (BRB) Bond Program should promote racial integration, however, the continued failure of these entities to evaluate the implications of prior and current funding decisions permits the Department and the BRB to disproportionately allocate federal low income housing tax credit funds and the tax exempt bond funds to developments located in impacted areas (above average minority concentration and below average income levels)….
>
> The vast majority of low-income housing tax credits and tax-exempt bonds that fund developments in the Dallas, Fort Worth, Austin and Houston metropolitan areas have been placed in impacted areas.

| City | % of Units Above Average Minority Areas | % of Units in Below Average Income Areas |
|------|------------------------------------------|-------------------------------------------|
| Dallas | 77% | 88% |
| Fort Worth | 56% | 72% |
| Austin | 86% | 76% |
| Houston | 72% | 78% |

> The Department's funding decisions arise directly out of the QAP. In recent years, the QAP has continued to place low-income individuals in impacted areas, further adding to the concentration problems in most cities today." 2006 HUAC report, page 48.

The 2006 HUAC report recommended that TDHCA consider adding provisions to the QAP and bond rules "that give significant point scoring and/or set-aside of credits for affirmatively furthering assimilation outside of impacted areas." 2006 HUAC report, page 49. Further recommendations included examining social and demographic data when making their funding decisions. *Id.*

The examination of social and demographic data is consistent with the judicial holdings on the AFFH obligation for governments and recipients of HUD funding to examine the racial and economic characteristics and the impact of locating proposed housing in the specific location chosen for that housing has on the segregation of neighborhoods and take steps to replace the segregation with integrated living patterns. *NAACP, Boston Chapter v. HUD*, 817 F.2d 149 (1st Cir. 1987); *Clients' Council v. Pierce*, 711 F.2d 1406, 1425 (8th Cir. 1983); *Otero v. New York City Housing Auth., et al.,* 484 F.2d 1122 (2d Cir. 1973); *Shannon v. HUD*, 436 F.2d 809 (3d Cir. 1970); *Thompson v. HUD*, 348 F. Supp. 2d 398, 409 (D. Md. 2005); *U.S. ex rel. Anti-Discrimination Ctr. v. Westchester Cnty.*, 2009 WL 455269 (S.D.N.Y. Feb. 24, 2009). HUD's existing 2021 AFFH rule summarizes the judicial holdings:

> These courts have held that funding recipients, to meet their AFFH obligations, must, at a minimum, ensure that they make decisions informed by preexisting racial and socioeconomic residential segregation. The courts have further held that, informed by such information, funding recipients must strive to dismantle historic patterns of racial segregation; preserve integrated housing that already exists; and otherwise take meaningful steps to further the Fair Housing Act's purposes beyond merely refraining from taking discriminatory actions and banning others from such discrimination. 86 FR 30779-01.

As set out in *NAACP Boston Chapter*, the court held that if governments are complying with the duty to affirmatively further fair housing and examining the impact of funding and housing decisions on existing segregation, then one would expect over time for that segregation to decrease and for new desegregated housing opportunities to be provided by the governments. *NAACP, Boston Chapter v. HUD*, 817 F.2d at 155-156. The lessening of the segregated location of LIHTC projects over time has not happened in Texas. Instead, the LIHTC projects have become more segregated than at the time of the 2006 HUAC report. Exhibit 1, attached charts of segregation of five major Texas cities.

The increase in LIHTC allocations in Black and Hispanic neighborhoods in Texas' major cities decreases the housing opportunities for LIHTC eligible Texans and for voucher families. The lack of fair housing choice steers these families into racially concentrated locations where the LIHTC housing is located.

Given the judicial AFFH directives to governments, TDHCA must examine the racial and ethnic locations of the LIHTC program in Texas as part of the 2024 AI. If TDHCA does not analyze the existing locations of the LIHTC housing, TDHCA is continuing to ignore housing allocation decisions that will serve to increase the segregation and poverty. TDHCA will be

unable to certify with its 2024 AI that it is complying with HUD's 2021 AFFH rule if it continues to ignore the segregated locations of the LIHTC housing and the policies contributing to it.

**The facts show that LIHTC projects that are located in Black and Hispanic neighborhoods are disproportionately exposed to environmental harms, industrial emissions and risks to health and safety.**

In addition to the majority of TDHCA allocations of LIHTC in major cities being located in neighborhoods of color, within those neighborhoods a majority of the LIHTC projects are disproportionately exposed to environmental harms, industrial pollution, and risks to health and safety. With the 2024 AI, TDHCA must look at the policies and practices that are locating a disproportionate number of those projects in Black and Hispanic neighborhoods with industries and environmental harms that put residents' health and safety at risk.

The high correlation between the racial segregation in locations and the existence of various types of adverse environmental risks posed by industrial uses is shown by a recently released database compiled by the Centers for Disease Control and the Agency for Toxic Substances and Disease Registry, the Environmental Justice Index (EJI). This EJI Index uses data from the U.S. Census Bureau, the U.S. Environmental Protection Agency, the U.S. Mine Safety and Health Administration, and the U.S. Centers for Disease Control and Prevention to rank the cumulative impacts from environmental and health hazards on every census tract in the nation.[5]

The EJI Index uses census tract specific information such as the proportion of each tract's area within a 1-mi buffer of Toxic Release Inventory (TRI) sites. This data is then given a percentile ranking that represents the proportion of tracts in the nation that are less impacted by that element such as the presence of industrial uses that are monitored for toxic releases. For example, a EJI Index element ranking of 0.85 signifies that 85% of tracts in the nation likely experience less severe cumulative impacts from environmental burden than the tract of interest, and that 15% of tracts in the nation likely experience more severe cumulative impacts from environmental burden.[6]

This comment includes an analysis of the correlation between the percentage of minority population in LIHTC tracts and four specific EJI industrial related elements.[7] The analysis is

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[5] https://www.atsdr.cdc.gov/placeandhealth/eji/index.html.

[6] https://www.atsdr.cdc.gov/placeandhealth/eji/faq_eji.html.

[7] The EJI defines minority as "Indicator: Percent of population that is a racial/ethnic minority (all persons except white, non-Hispanic)" The EJI uses the U.S. Census Bureau American Community Survey (ACS) 5yr 2015-2019 data for minority status. Technical Documentation for the Environmental Justice Index 2022, page 40, available at

conducted for the same five cities included in the segregation analysis set out above. Both the census tract information and the percentile ranking are provided along with the number of units in LIHTC projects by race of the tract for each element. These industrial use elements show a high correlation with a high percentage of locations with LIHTC units in minority rather than White census tracts.

The EJI elements used for this analysis are: 1) Proportion of tract area within 1 mile buffer of EPA National Priority (Superfund) sites; 2) Potentially Hazardous & Toxic sites from the Toxic Release Inventory (TRI) sites and proportion of tract within 1 mile buffer of TRI; 3) Proportion of tract area within 1 mile buffer of EPA Treatment, Storage, and Disposal Facilities 4) Proportion of tract area within 1 mile buffer of EPA Risk Management Plan sites.

The EJI description of these elements is set out in the following.

1) **Indicator: Proportion of tract area within 1-mi buffer of EPA National Priority List (NPL) sites E-NPL.**[8]
Rationale:
Sites on the EPA's National Priorities List (NPL), which are designated by the U.S. EPA as priorities through hazard assessment, nomination by states or territories, or issuance of a health advisory by the Agency for Toxic Substances and Disease Registry, can present several potential hazards to the health and well-being of neighboring communities. While actual risks to health vary by sites, proximity to these sites can have important and complex effects on community stress and perceptions of risk (Kiel & Zabel, 2001; Pearsall, 2010). Furthermore, legacy contaminants associated with many of these sites can affect multiple environmental media, becoming airborne with windblown dust or leaching into soil and groundwater and possibly exposing surrounding communities through drinking water or vapor intrusion. Technical Documentation page 29.

2) **Potentially Hazardous & Toxic Sites: Toxic Release Inventory Sites**. E-TRI.
Indicator: Proportion of tract area within 1-mi buffer of Toxic Release Inventory (TRI) sites.
Rationale:

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https://www.atsdr.cdc.gov/placeandhealth/eji/technical_documentation.html. (Technical Documentation). The minority status data used in the segregation tables is based on the ACS 2017-2021 Census data. See Exhibit 1 attached. The differences in minority status in the two data sets are minor and do not substantially affect the analysis.

[8] The national percentile rank name for each of these indicators is EPL_NPL, EPL_TRI, EPL_TSD, EPL_RMP. Technical Documentation page 76. The data entry name for the data indicators is E_NPL, E_TRI, E_TSD, and E_RMP. Technical Documentation page 86.

Sites listed through the EPA's Toxic Release Inventory (TRI) include all facilities with 10 or more full time employees which operate within certain industrial sectors and annually either 1) manufacture more than 25,000 pounds of listed chemicals or 2) used more than 10,000 pounds of listed chemicals. These sites can affect the health of neighboring communities through routine chemical releases into air, soil, or water. Residential proximity to TRI sites has been linked to higher rates of hospitalization for COPD (Brown-Amilian & Akolade, 2021) as well as increased risks for certain kinds of cancer (Bulka et al., 2016). Additionally, TRI sites and other noxious and unwanted land uses can produce noise and odor pollution and, particularly in communities burdened by multiple such land uses, can lead to increased burden of community stress (Wilson et al., 2012). Technical Documentation page 30.

**3) Potentially Hazardous & Toxic Sites: Treatment, Storage, and Disposal Facilities. E_TSD.**
Indicator: Proportion of tract area within 1-mi buffer of EPA Treatment, Storage, and Disposal Facilities (TSDF)
Rationale:
Sites listed as Treatment, Storage, and Disposal Facilities (TSDF) are responsible for handling hazardous wastes such as manufacturing by-products, cleaning fluids, or pesticides throughout the process of collection, transfer, and ultimately disposal. Volatile substances generated by waste may become aerosolized or migrate into soil and water, leading to vapor intrusion or contamination of groundwater (Johnston & MacDonald Gibson, 2015; Marshall et al., 1993). Proximity to hazardous waste sites has been linked to increased rates of hospitalizations for diseases such as stroke, diabetes, and coronary heart disease (Kouznetsova et al., 2007; Sergeev & Carpenter, 2005; Shcherbatykh et al., 2005). Technical Documentation page 30.

**4) Potentially Hazardous & Toxic Sites: Risk Management Plan Sites. E_RMP.**
Indicator: Proportion of tract area within 1-mi buffer of EPA Risk Management Plan (RMP) sites
Rationale:
The EPA's Risk Management Plan (RMP) program covers ~12,000 of the nation's most high-risk facilities that produce, use, or store significant amounts of certain highly toxic or flammable chemicals. These facilities must prepare plans for responding to a worst-case incident such as a major fire or explosion that releases a toxic chemical into the surrounding community (US Environmental Protection Agency, 2016). There are many negative health effects associated with residing in proximity to RMP sites. The EPA estimates that about 150 "reportable" incidents of unplanned chemical releases occur each year at RMP facilities, separate from the daily toxic emissions that are allowed under most operating permits. The EPA

notes that these incidents "pose a risk to neighboring communities and workers because they result in fatalities, injuries, significant property damage, evacuations, sheltering in place, or environmental damage" (US Environmental Protection Agency, 2021). Besides direct deaths and injuries caused by chemical release and explosion incidents, research shows increased risk of cancer and respiratory illness from toxic air pollution exposure at these sites. Although the effects of proximity to RMP sites on community stress has not formally been assessed, it is also reasonable to assume that fear of potential chemical plant disasters contributes to the burden of psychosocial stress imposed on communities by cumulative environmental and social stressors (Hynes & Lopez, 2007). Technical Documentation page 31.

The number of total units in LIHTC projects within the buffer zone for each of these adverse industrial uses, the number of total units within the buffer zone in census tracts where the national ranking shows that the impacts from the element exceed the impacts found in 75% of all census tracts in the nation and the racial distribution of these units is set out in the table summarizing the EJI data in Exhibit 3.

Exhibit 3 demonstrates both the presence of the adverse uses in the buffer zone and the high impact national percentile rankings in the five cities. The Dallas data shows 94.8% of the 20,983 LIHTC units located in census tracts within the buffer zone of industries subject to the Toxic Release Inventory are in minority census tracts. In addition, 96.7% of the 9,424 units located in those census tracts with the high impact national percentile ranking of .75 or higher are in minority census tracts. Four of the eight data elements show that 100% of the units in LIHTC projects affected are in minority census tracts San Antonio also has four of the eight data elements where 100% of the units in LIHTC projects affected are in minority census tracts. See Exhibit 3 table.

TDHCA's QAP undesirable site features recognize the adverse effect of industrial uses on LIHTC residents. 10 TAC § 11.101(a)(2)(B), (E), (I), (K) (solid waste facilities, sanitary landfill facilities, refineries, heavy industry (i.e. facilities that require extensive use of land and machinery, produce high levels of external noise such as manufacturing plants, or maintains fuel storage facilities) and any other site that will cause exposure to an environmental factor that may adversely affect the health and safety of the residents). However, these rules have not prevented the development of LIHTC projects in areas of environmental risk and heavy industry.

Further, there has been no element in any State or TDHCA policy or decisions that has subjected these effects to the actions required by the State's Affirmatively further fair housing certification. TDHCA is required to examine these and other patterns of racial segregation and unequal treatment in TDHCA's LIHTC program as part of the 2024 AI. 86 FR 30779-01; 24 C.F.R. § 5.151. With the 2024 AI, TDHCA must assess its policies and practices in the LIHTC program that are directing housing into EJI areas disproportionately located in Black and Hispanic neighborhoods.

**TDHCA policies and practices contributing to the overconcentration of LIHTC in neighborhoods of color and should be examined by TDHCA in the 2024 AI.**

As part of the 2024 AI, the following policies impact the location of the LIHTC projects and must be assessed by TDHCA for the impact on segregation. These policies are not an exclusive list as there are other policies that directly impact the location of LIHTC projects.

1. **Local municipal veto**

As a result of a change in state law in 2013, Texas cities have a veto over the development of LIHTC projects in their jurisdiction. Under the 2013 law, a City or County must provide a resolution of support or no objection in order for a LIHTC developer to proceed with an application for tax credits from TDHCA.[9] These statutes were enacted in 2013 immediately following the remedial order that had been entered in 2012 in *ICP v. TDHCA*, Memorandum Opinion and Order 3:08-CV-0546-D (N.D. Tex. 2012) (remedial order).[10] The "municipal veto" granted with these statutes was not at issue in that case.

As part of the 2024 AI and for TDHCA to certify it will AFFH, TDHCA must analyze the impact of this state law under its obligation to AFFH in the LIHTC program. The Fair Housing Act invalidates a state law that requires or permits any action that is a discriminatory housing practice. 42 U.S.C. § 3615. The IRS acknowledges that municipal vetoes such as Texas' law can be discriminatory and violate the Fair Housing Act:

> Agency's practice of requiring local approval has created a pattern of allocating housing credit dollar amounts that has perpetuated residential racial segregation in State X. Agency's practice, therefore, has a discriminatory effect based on race, which is a protected characteristic under 42 USC 3604. Thus, the practice is inconsistent with at least the policy of the Fair Housing Act of 1968 (the Act), 42 USC 3601–3619. Rev. Ruling 2016-29.

In 2016, a U.S. Government Accountability Office (GAO) study of the LIHTC program noted that several states reported concerns about the detrimental influence of local support criteria on openness and fairness.[11] The GAO report cited HUD's Office of Fair Housing and

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[9] Resolutions are required for 4% LIHTC applications to proceed. Tex. Gov't Code §2306.67071(c). A developer will also not be able to score competitively in the 9% LIHTC competition for an award of tax credits from TDHCA without the 17 points given for a city resolution of support or no objection. Tex. Gov't Code § 2306.6710(b)(1)(B).

[10] These laws were not in place during the 2011 ICP v. TDHCA trial nor were they a part of the Supreme Court proceedings or the proceedings after the Supreme Court.

[11] 2016 GAO Report, Low-Income Housing Tax Credit, Some Agency Practices Raise Concerns and IRS Could Improve Noncompliance Reporting and Data Collections page 14-17 (2016 GAO Report).

Equal Opportunity and the Office of General Counsel as being concerned about "the discriminatory influence these factors could have on where affordable housing is built." [12]

In Texas, the gap between the allocation rates for LIHTC units to be in White areas and those in Black and Hispanic areas has increased substantially since the passage of the state law requiring municipal resolutions of support or no objection for LIHTC applications.[13] The percentage of LIHTC applications for units in minority areas that were allocated tax credits increased from 28% (for the years 2009 to 2013) to 44% (for the years 2014 to 2017) after the municipal veto state law was implemented in 2013. Exhibit 2. The percentage of LIHTC applications for units located in Majority White areas remained well below the percentage of units approved in minority areas and even decreased from 18.6% from 2009 to 2013 to 16.2% from 2014 to 2017. Exhibit 2.

As such, TDHCA must assess the effect on segregation of the municipal local veto of LIHTC projects. Based on the evidence of the applications submitted before and after the implementation of the state law, fewer LIHTC applications are permitted to proceed from predominantly White cities. In the seven-county area that includes Dallas, Denton, and Collin counties, the applications for LIHTC projects in white areas decreased as did the allocation rate in white areas after the implementation of the state law requiring city resolutions of support or not objection. Exhibit 2, Chart – Comparison of units in LIHTC applications receiving LIHTC allocations between White and Minority locations, 2009-2017.

The State has known the impact of requiring political support scoring since the 2006 HUAC report. That report stated that requiring political support to count in scoring applications facilitates NIMBY attitudes of suburbs and officials and steers housing into neighborhoods of color. The 2006 HUAC report recommended that such provisions be eliminated as "they have no place in funding decisions for affordable housing." 2006 HUAC page 49.

The current HUD 2021 AFFH rule requires the State to take meaningful actions to identify strategies and actions that would overcome historic patterns of segregation, promote integration, increase access to opportunity, and ensure fair housing choice in the LIHTC program. TDHCA must analyze the impact of the state law municipal veto on preventing fair housing choice and perpetuating segregation and assess the meaningful actions that TDHCA could take to lessen the segregative effect of the state law to open up integrated housing opportunities.

2. **TDHCA policies allowing local municipalities to waive TDHCA and state policies on overconcentration in poverty census tracts has caused an increase in racial and poverty concentrations.**

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[12] 2016 GAO Report, page 16.

[13] Exhibit 2 Chart - Comparison of units in LIHTC applications receiving LIHTC allocations between White and Minority locations – 2009-2017 for Dallas and surrounding counties.

The current QAP contains TDHCA and state law policies that are designed to prevent the overconcentration of LIHTC units in neighborhoods. TDHCA policies allow for a local municipality to waive those restrictions for new construction of LIHTC into those areas already deemed overconcentrated with LIHTC units by TDHCA. The facts show that these waivers are increasing segregation and poverty in the LIHTC program, and these policies must be examined by TDHCA in the 2024 AI.

The TDHCA and State policies at issue are as follows.

First, TDHCA prohibits the development of LIHTC housing in census tracts with more than 20% Housing Tax Credit units per total households unless the City explicitly waives this requirement. 10 Tex. Admin. Code. §11.3 (e).[14]

Second, a City can waive the state law requirement that is to prevent the construction of a LIHTC project within one mile of an existing LIHTC project. TDHCA may not allocate LIHTCs to an application within one mile of an existing LIHTC project serving the same type of population if the existing LIHTC project received an allocation during the preceding three-year period. Tex. Gov't Code § 2306.6703(a)(3). The only way for the project to proceed is if the City votes to specifically allow the construction of the project and waives the one mile requirement. Tex. Gov't Code § 2306.6703(b)(4).

Third, a City also has the legal authority to unilaterally override a TDHCA determination that applications are not eligible for an LIHTC allocation because of the high poverty of the census tract of the location (over 40% poverty) without providing any justification. 10 Tex. Admin. Code § 11.101(a)(3)(D)(i).[15]

These three policies allowing municipalities to waive TDHCA and state law overconcentration policies is increasing already over concentrations of poverty. For example,

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[14] This QAP provision states:

> (e) Limitations on Developments in Certain Census Tracts. An Application that proposes the New Construction or Adaptive Reuse of a Development proposed to be located in a census tract that has more than 20% Housing Tax Credit Units per total households as reflected in the Department's current Site Demographic Characteristics Report shall be considered ineligible unless the Governing Body of the appropriate municipality or county containing the Development has adopted a resolution that the Governing Body of the appropriate municipality or county containing the Development has no objection to the Application. Rehabilitation Developments are not required to obtain such resolution…. 10 Tex. Admin. Code. §11.3 (e).

[15] This provision of the QAP states:

> Mitigation for Developments in a census tract that has a poverty rate that exceeds 40% may include a resolution from the Governing Body of the appropriate municipality or county containing the Development, acknowledging the high poverty rate and authorizing the Development to move forward. A Neighborhood Risk Factors Report is not required to be submitted, the resolution alone will suffice. If the Development is located in the ETJ, the resolution would need to come from the county.

there are recent examples of the overconcentration policies being waived by the City of Dallas for areas with existing racially concentrated areas of LIHTC units and of poverty. See for example the City Resolutions for: Palladium at Red Bird, (concentration over 20%) 2/27/2019; Skyline at Cedar Crest (40% poverty) 2/24/21; Standard at Royal Lane (de-concentration one mile requirement) 6/9/2021; Terrace at Southern Oaks (40% poverty, concentration over 20%, and de-concentration one mile requirement) 9/22/21.

Such concentrations of high poverty increase neighborhood disadvantages. HUD research overwhelmingly supports the proposition that over-concentration of low-income housing that significantly increases the concentration of poverty causes specific injuries for residents in those areas.

> While the causes of poverty may be debated at length, it is generally accepted that households living in neighborhoods with concentrations of very low- and low-income residents face serious social and economic challenges, and these many low-income households are typically unable to achieve improved social or economic status. There are numerous problems associated with the concentration of poverty, including high crime rates, increased health problems, malnutrition, high unemployment rates, and high numbers of children dropping out of school. U.S. Department of Housing and Urban Development, *Mixed-Income Housing and the HOME Program*, 2003, page 8.

Recent research continues to explain the harms to the residents in the high poverty areas:

> . . . assisted housing policies that place aid recipients in neighborhoods near their poverty tipping points (15–20 percent) will only speed their transition into places of concentrated disadvantage. Galster, G*., Nonlinear and Threshold Effects Related to Neighborhood: Implications for Planning and Policy*, Journal of Planning Literature 2018, Vol. 33(4), 492, 504.

While TDHCA policy supports the existence of this injury from overconcentrating poverty, the TDHCA policies allowing municipalities to waive such poverty overconcentration policies do not achieve TDHCA's de-concentration goals.

The federal agency administering the LIHTC program, the IRS, has found that:

> Placing LIHTC projects in qualified census tracts risks exacerbating concentrations of poverty. Therefore, § 42(m)(1)(B)(ii)(III) grants a preference to that placement only when there is an added benefit to the neighborhood in the form of the project's contribution to a concerted community revitalization plan. IRS Notice 2016-77, page 2.

The LIHTC applications where the municipalities are waiving the poverty concentration policies of the QAP to allow more LIHTC development are not being accompanied by concerted community revitalization plans.

TDHCA QAP policies allowing local jurisdictions to increase poverty and racial concentrations does not meet the 2021 HUD AFFH requirement for meaningful actions for

"transforming racially or ethnically concentrated areas of poverty into areas of opportunity." 86 FR 30779-01; 24 C.F.R. §5.151.

3.  **The existing LIHTC segregation also impacts the available housing for voucher families and limits fair housing choice for voucher tenants.**

LIHTC housing projects cannot refuse to lease to voucher families because they have a voucher. 26 U.S.C. § 42(h)(6)(B)(iv). As such, the LIHTC projects in the State provide a critical source of housing for voucher families. The disproportionate location of the state's LIHTC projects in Black and Hispanic neighborhoods in major metropolitan areas also steers voucher tenants into those same locations.

TDHCA's 2024 AI should assess the impact of the segregated location of LIHTC projects on voucher tenants in Texas' major cities. The lack of fair housing choice for voucher families is an impediment to fair housing.

**Conclusion**

Using TDHCA's 2019 AI as the basis for TDHCA's 2024 AI will not serve to meet the current legal AFFH requirements set out by HUD's existing 2021 AFFH rule. TDHCA is required to AFFH in all of its activities and programs relating to housing and urban development. 86 FR 30779-01; 24 C.F.R. § 5.151. TDHCA's 2019 AI fails to assess the impact of race and segregation in the state's LIHTC program. ICP's early input comment requests that TDHCA include in its AFFH analysis the racial segregation of the State's LIHTC project locations.

As part of the 2024 AI, TDHCA must analyze the LIHTC project locations that are overwhelmingly located in racially and ethnically concentrated locations in Texas' major cities. The State's failure to adequately consider the impact of race on housing opportunities will render the State's certification deficient. *U.S. ex rel. Anti- Discrimination Ctr. v. Westchester Cnty.*, 668 F.Supp.2d 548 (S.D.N.Y. Feb. 24, 2009).

To be compliant with HUD's existing AFFH rule, the State and TDHCA must take meaningful actions to identify strategies and actions that would overcome historic patterns of segregation, promote integration, increase access to opportunity, and ensure fair housing choice in the State and TDHCA's LIHTC housing program.

Michael Daniel and Laura Beshara represent ICP and with the preparation of this early comment. If you have further questions about this comment, please let us know.

Sincerely,

Laura B. Beshara
Michael M. Daniel
Daniel & Beshara, P.C.
Attorneys for Inclusive Communities Project

cc w/ exhibits:
Ann Lott, President of Inclusive Communities Project

# City of Dallas 2023 HTC Inventory

| City of Dallas | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 154 | | | 24,792 | 23,147 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 145 | | | 23,454 | 22,040 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 94.2% | | | 94.6% | 95.2% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 9 | | | 1,338 | 1,107 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 5.8% | | | 5.4% | 4.8% |

Exhibit 1

City of Dallas 2023 HTC Inventory
analysis of allocations from 2016 to present

| City of Dallas 2016 to 2023 LIHTC allocations | LIHTC projects | | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 80 | | | | 14,417 | 13,107 |
| Total in tracts with less than 50% White not Hispanic or Latino | 75 | | | | 13,493 | 12,386 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 93.8% | | | | 93.6% | 94.5% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 5 | | | | 924 | 721 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 6.3% | | | | 6.4% | 5.5% |

Exhibit 1

## City of Houston 2023 HTC Inventory

| City of Houston | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 307 | | | 47,152 | 44,447 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 288 | | | 45,348 | 42,847 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 93.8% | | | 96.2% | 96.4% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 19 | | | 1,804 | 1,600 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 6.2% | | | 3.8% | 3.6% |

Exhibit 1

## City of Houston 2023 HTC Inventory
## analysis of allocations from 2016 to present

| City of Houston 2016 to 2023 LIHTC allocations | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 155 | | | 23,254 | 21,740 |
| Total in tracts with less than 50% White not Hispanic or Latino | 140 | | | 21,942 | 20,625 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 90.3% | | | 94.4% | 94.9% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 15 | | | 1,312 | 1,115 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 9.7% | | | 5.6% | 5.1% |

Exhibit 1

# City of San Antonio 2023 HTC Inventory

| City of San Antonio | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA Inventory | 179 | | | 30,722 | 28,900 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 178 | | | 30,523 | 28,701 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 99.4% | | | 99.4% | 99.3% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 1 | | | 199 | 199 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 0.6% | | | 0.6% | 0.7% |

Exhibit 1

# City of San Antonio 2023 HTC Inventory
## 2016 to current

| City of San Antonio 2016 to current | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 93 | | | 17,163 | 16,632 |
| Total in tracts with less than 50% White not Hispanic or Latino | 92 | | | 16,964 | 16,433 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 98.9% | | | 98.8% | 98.8% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 1 | | | 199 | 199 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 1.1% | | | 1.2% | 1.2% |

Exhibit 1

City of Austin 2023 HTC Inventory

| City of Austin | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 183 | | | 30,435 | 29,622 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 150 | | | 26,256 | 25,576 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 82.0% | | | 86.3% | 86.3% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 33 | | | 4,179 | 4,046 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 18.0% | | | 13.7% | 13.7% |

Exhibit 1

City of Austin 2023 HTC Inventory
2016 to current

| City of Austin 2016 to 2023 LIHTC allocations | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 118 | | | 19,259 | 18,801 |
| Total in tracts with less than 50% White not Hispanic or Latino | 97 | | | 16,735 | 16,329 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 82.2% | | | 86.9% | 86.9% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 21 | | | 2,524 | 2,472 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 17.8% | | | 13.1% | 13.1% |

Exhibit 1

# City of Fort Worth 2023 HTC Inventory

| City of Fort Worth | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 114 | | | 17,543 | 16,524 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 89 | | | 13,840 | 13,137 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 78.1% | | | 78.9% | 79.5% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 25 | | | 3,703 | 3,387 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 21.9% | | | 21.1% | 20.5% |

Exhibit 1

City of Fort Worth 2023 HTC Inventory
2016 to current

| City of Fort Worth 2016 to 2023 LIHTC allocations | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| Total | 60 | | | 9,138 | 9,138 |
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 57 | | | 9,058 | 8,341 |
| Total in tracts with less than 50% White not Hispanic or Latino | 44 | | | 6,915 | 6,432 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 77.2% | | | 76.3% | 77.1% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 14 | | | 2,143 | 1,909 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 24.6% | | | 23.7% | 22.9% |

Exhibit 1

Comparison of units in LIHTC applications receiving LIHTC allocations between White and MInority locations for Dallas and surrounding counties -                    2009 - 2017

Comparison of percent
of units allocated LIHTC
in Majority White non-
Hispanic tracts to
percent of units
allocated LIHTC in
Minority tracts, 2009 -
2017

| Year | Percent of Applications for Units in Majority White Areas, LIHTC allocated | Percent of Applications for Units in Minority Areas, LIHTC allocated | Allocation Rate for Majority White Areas as Percent of allocation rate for Minority Areas |
|---|---|---|---|
| 2009 | 20.1% | 24.7% | 81.4% |
| 2010 | 18.0% | 18.9% | 95.4% |
| 2011 | 27.9% | 56.7% | 49.3% |
| 2012 | 6.6% | 19.0% | 34.8% |
| 2013 | 27.5% | 30.6% | 89.8% |
| 2014 | 31.4% | 54.0% | 58.2% |
| 2015 | 8.6% | 54.9% | 15.6% |
| 2016 | 15.9% | 43.8% | 36.4% |
| 2017 | 11.1% | 26.3% | 42.1% |

| | | | |
|---|---|---|---|
| All Applications 2009 to 2017 | 17.1% | 35.5% | 48.1% |
| All Applications 2009 to 2013 | 18.6% | 28.3% | 65.7% |
| All Applications 2014 to 2017 | 16.2% | 44.1% | 36.6% |

Exhibit 2
TDHCA LIHTC 4 Percent and 9 Percent Combined Applications Awarded and Not Awarded for 7 County Area

**CDC/ATSDR EJI Index industrial related factor***

| | EJI Factor: Proportion of tract area within 1-mi buffer of EPA National Priority List (NPL) sites | EJI Factor: Percentile rank ofproportion of tract's area within 1-mi buffer of EPA National Priority List site | EJI Factor: Proportion of tract area within 1-mi buffer of Toxic Release Inventory (TRI) sites | EJI Factor: Percentile rank of proportion of tract's area within 1-mi buffer of EPA Toxic Release Inventory site | EJI Factor: Proportion of tract area within 1-mi buffer of EPA Treatment, Storage, and Disposal Facilities (TSDF) | EJI Factor: Percentile rank of proportion of tract'sarea within 1-mi buffer of EPA Treatment, Storage,and Disposal site | EJI Factor: Proportion of tract area within 1-mi buffer of EPA Risk Management Plan (RMP) sites | EJI Factor: Percentile rank ofproportion of tract'sarea within 1-mi buffer of EPA risk management plan site |
|---|---|---|---|---|---|---|---|---|

**Units in TDHCA LIHTC projects affected by the CDC/ATSDR EJI industrial related element**

| City | # of LIHTC units in tracts containing area within 1 mi buffer of NPL site | # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of Toxic Release Inventory (TRI) sites | # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites for the Treatment, Storage, and Disposal of hazardous wastes | # of units in LIHTC projects in tracts with exposure to T, S, D hazardous waste sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites subject to Risk Management Plans | # of units in LIHTC projects in tracts with exposure to sites subject to Risk Management Plans that is greater than the national percentile rank of .75. ** |
|---|---|---|---|---|---|---|---|---|
| Houston | 6171 | 6171 | 39595 | 23257 | 5852 | 5852 | 26444 | 21127 |
| White tracts | 351 | 351 | 1499 | 514 | 0 | 0 | 839 | 465 |
| Minority tracts | 5820 | 5820 | 38096 | 22743 | 5852 | 5852 | 25605 | 20662 |
| % in Minority tracts | 94.3% | 94.3% | 96.2% | 97.8% | 100.0% | 100.0% | 96.8% | 97.8% |
| | | | | | | | | |
| San Antonio | 1792 | 1792 | 25091 | 8641 | 4842 | 4842 | 14868 | 11897 |
| White tracts | 0 | 0 | 303 | 94 | 0 | 0 | 358 | 358 |
| Minority tracts | 1792 | 1792 | 24788 | 8547 | 4842 | 4842 | 14510 | 11539 |
| % in Minority tracts | 100.0% | 100.0% | 98.8% | 98.9% | 100.0% | 100.0% | 97.6% | 97.0% |
| | | | | | | | | |
| Austin | 0 | 0 | 23946 | 9749 | 0 | 0 | 16388 | 13679 |
| White tracts | 0 | 0 | 1696 | 325 | 0 | 0 | 1082 | 1012 |
| Minority tracts | 0 | 0 | 22250 | 9424 | 0 | 0 | 15306 | 12667 |
| % in Minority tracts | 0 | 0 | 92.9% | 96.7% | 0.0% | 0.0% | 93.4% | 92.6% |
| | | | | | | | | |
| Dallas | 2748 | 2748 | 20983 | 11558 | 2796 | 2796 | 14735 | 12009 |
| White tracts | 0 | 0 | 1194 | 952 | 0 | 0 | 417 | 107 |
| Minority tracts | 2748 | 2748 | 19789 | 10606 | 2796 | 2796 | 14318 | 11902 |
| % in Minority tracts | 100.0% | 100.0% | 94.3% | 91.8% | 100.0% | 100.0% | 97.2% | 99.1% |

Exhibit 3    page 1

| | EJI Factor: Proportion of tract area within 1-mi buffer of EPA National Priority List (NPL) sites | EJI Factor: Percentile rank ofproportion of tract's area within 1-mi buffer of EPA National Priority List site | EJI Factor: Proportion of tract area within 1-mi buffer of Toxic Release Inventory (TRI) sites | EJI Factor: Percentile rank of proportion of tract's area within 1-mi buffer of EPA Toxic Release Inventory site | EJI Factor: Proportion of tract area within 1-mi buffer of EPA Treatment, Storage, and Disposal Facilities (TSDF) | EJI Factor: Percentile rank of proportion of tract'sarea within 1-mi buffer of EPA Treatment, Storage,and Disposal site | EJI Factor: Proportion of tract area within 1-mi buffer of EPA Risk Management Plan (RMP) sites | EJI Factor: Percentile rank ofproportion of tract'sarea within 1-mi buffer of EPA risk management plan site |
|---|---|---|---|---|---|---|---|---|
| **CDC/ATSDR EJI Index industrial related factor\*** | | | | | | | | |
| **Units in TDHCA LIHTC projects affected by the CDC/ATSDR EJI industrial related element** | | | | | | | | |
| | # of LIHTC units in tracts containing area within 1 mi buffer of NPL site | # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of .75. \*\* | # of units in LIHTC projects in tract containing area within 1-mi buffer of Toxic Release Inventory (TRI) sites | # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of .75. \*\* | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites for the Treatment, Storage, and Disposal of hazardous wastes | # of units in LIHTC projects in tracts with exposure to T, S, D hazardous waste sites that is greater than the national percentile rank of .75. \*\* | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites subject to Risk Management Plans | # of units in LIHTC projects in tracts with exposure to sites subject to Risk Management Plans that is greater than the national percentile rank of .75. \*\* |
| **City** | | | | | | | | |
| Fort Worth | 1173 | 1173 | 13621 | 5632 | 451 | 451 | 8159 | 6072 |
| White tracts | 88 | 88 | 3404 | 611 | 0 | 0 | 2278 | 1239 |
| Minority tracts | 1085 | 1085 | 10217 | 5021 | 451 | 451 | 5881 | 4833 |
| % in Minority tracts | 92.5% | 92.5% | 75.0% | 89.2% | 100.0% | 100.0% | 72.1% | 79.6% |

\* The CDC/ATSDR EJI Index data and documentation was compiled and is maintained by the Center For Disease Control (CDC) and its (ATSDR).

Agency for Toxic Substances and Disease Registry (ATSDR). This data is available at

https://www.atsdr.cdc.gov/placeandhealth/eji/index.html.

\*\* The higher the percentile rank, the higher the relative adverse impacts from the environmental factor compared to all other tracts in the nation.

A percentile ranking represents the proportion of tracts (or counties) that are equal to or lower than a tract of interest in environmental burden.

For example, a EJI ranking of 0.85 signifies that 85% of tracts in the nation likely experience less severe cumulative impacts from environmental burden

than the tract of interest,and that 15% of tracts in the nation likely experience more severe cumulative impacts from environmental burden.

available at:

\*\*\* The number of units in this exhibit 3 is varies somewhat from the units in Exhibit 1. This Exhibit was prepared using the

TDHCA HTC Inventory creasted on 3/25/2023. Exhibit 1 was prepared using the TDHCA October 30, 2023 HTC Inventory.

Exhibit 3     page 2

November 30, 2023

TDHCA
Fair Housing
c/o Housing Resource Center
P.O. BOX 13941
Austin, TX 78711-3941

RE: 2024 State of Texas Analysis of Impediments to Fair Housing Choice Early Input

To whom it may concern:

Thank you for the opportunity to provide early input on the 2024 State of Texas Analysis of Impediments to Fair Housing Choice. For 35 years, Texas Housers has worked with community and neighborhood leaders across Texas to realize the Fair Housing Act's promise that every American can live in a safe and affordable home in the neighborhood of their choice, free from public and private discrimination. With the 2024 Analysis of Impediments to Fair Housing Choice, Texas can choose to set the stage for meaningful action to achieve material change in fair housing conditions in the state.

Texas Housers offers comments on the following pages.

Thank you,

Ben Martin
Research Director
Texas Housers
ben@texashousing.org

The U.S. Department of Housing and Urban Development's (HUD's) Fair Housing Planning Guide identifies three key components to a successful Analysis of Impediments to Fair Housing Choice (AI):

1. Analysis of impediments
2. Taking actions to eliminate identified impediments
3. Maintenance of records[1]

All three of these components are critical to an impactful AI. The State of Texas, through the AI, must appropriately identify a true and comprehensive list of impediments to fair housing choice in the state. Then, the State of Texas and the agencies listed in the AI are charged with identifying and taking "meaningful action" to remove or mitigate these impediments.

## The 2024 AI must identify meaningful actions that will eliminate impediments.

The Affirmatively Furthering Fair Housing Interim Final Rule (IFR) defines "meaningful actions" as, "significant actions that are designed and *can be reasonably expected to achieve a material positive change* that affirmatively furthers fair housing…" (emphasis added).[2] It cannot be overemphasized that the State of Texas must reasonably expect that the actions identified in the 2024 AI will achieve a material positive change in the identified impediments.

We understand that the impediments identified in prior State of Texas AIs and in many similar documents created across the country require action by both public and private sector partners to meaningfully eliminate. However, it is incumbent upon the state that the 2024 AI includes a thorough list of actions that the state government itself can perform that would achieve a material positive change in eliminating the identified barriers. In the 2024 AI, the State of Texas must show that it is prepared to use every tool in its arsenal to eliminate barriers to fair housing choice.

TDHCA and the State of Texas must use the 2024 AI to commit to ambitious actions to eliminate impediments to fair housing choice. Actions that commit TDHCA and other impacted agencies to teaching, training, and informing various stakeholders of fair housing law, responsibilities, and rights are extremely important, but ambitious action to counteract the existing impact of discrimination and segregation is also required. TDHCA and the State of Texas must use the AI process to commit to meaningful, measurable action to eliminate impediments.

Furthermore, while state agencies that use HUD funding are required to identify and implement actions to address impediments to fair housing choice, there is no requirement that limits agencies' actions to just the administration of HUD funds that the agencies manage. Agencies

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[1] *Fair Housing Planning Guide* (Volume 1). (n.d.). U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. Retrieved November 30, 2023, from https://www.hud.gov/sites/documents/FHPG.PDF, p. 1-2
[2] *NLIHC Advocates' Guide '23*. (2023). National Low Income Housing Coalition. https://nlihc.org/explore-issues/publications-research/advocates-guide, p. 8-15

can and must identify actions that their agencies can take to increase fair housing choice which go beyond their use of HUD funds.

## Reducing barriers to fair housing choice in Texas requires the provision of lowest income housing.

Black and Hispanic Texans are disproportionately lower-income compared to white Texans. According to the 2023 State of Texas Low Income Housing Plan 13% of Texas' white population is in poverty, compared to 18.7% of Black or African American Texans.[3] 18.3% of Hispanic or Latino Texans are in poverty, compared to 11.6% of non-Hispanic or Latino Texans.[4]

44% of white renters in Texas are housing cost burdened, paying more than 30% of their income toward rent, compared to 55% of Black Texans and 51% of Hispanic or Latino Texans.[5]

Racial and ethnic minorities, and other protected classes such as people with disabilities, are overrepresented among Texans with the lowest incomes. The AI must include continued and expanded action by TDHCA and other agencies to substantially prioritize the provision of lowest income housing to reach Extremely Low-Income and Very Low-Income households in the state.

## The Four Rights are a critical framework for ensuring an impactful AI.

The Texas Organizing Project ("TOP") has identified Four Rights of Fair Housing. According to TOP's model, which Texas Housers endorses, every Texan should have:

1. The right to choose where they live, in a decent and affordable home, regardless of their race, color, national origin, sex, religion, familial status, or whether they have a disability;

2. The right to stay in their neighborhood and enjoy improving conditions without fear of being involuntarily displaced by gentrification;

3. The right to equal treatment by their government and private institutions; and

4. The right to have a say in government policies that impact them, their homes, and their neighborhoods.

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[3] Texas Department of Housing and Community Affairs. (2023). *2023 State of Texas Low Income Housing Plan and Annual Report*. https://www.tdhca.state.tx.us/housing-center/docs/23-SLIHP.pdf, p. 18
[4] Texas Department of Housing and Community Affairs. (2023). *2023 State of Texas Low Income Housing Plan and Annual Report*. https://www.tdhca.state.tx.us/housing-center/docs/23-SLIHP.pdf, p. 19
[5] *National Equity Atlas*. (2023). National Equity Atlas. https://nationalequityatlas.org/indicators/Housing_burden?geo=02000000000048000

The 2024 AI should adopt these Four Rights as guiding principles and use them as a standard to measure impediments and actions against. An AI that uses the Four Rights as benchmarks will be well on its way to meaningfully considering impediments to fair housing choice.

## It is the responsibility of all agencies that receive HUD funding, not just TDHCA, to meaningfully participate in the AI process and address impediments.

All agencies that receive HUD funding must meaningfully participate in the AI process and address impediments. We are particularly concerned about meaningful participation from the Texas General Land Office (GLO). The GLO discriminated in decision making and actions in the planning and distribution of CDBG-DR and CDBG-MIT funds related to Hurricane Harvey. The agency is blatantly flouting fair housing law and there is every indication that they will continue to do so. We are highly skeptical about the GLO's meaningful participation in the AI process. The content and merit of these concerns are addressed in detail below.

Furthermore, we ask that TDHCA and the other agencies involved consider how other agencies besides TDHCA are involved in the AI public comment process. Will all public comment in the 2024 AI update flow through TDHCA? Will other agencies be involved in responding to public comment or just TDHCA? Will other agencies conduct their own public comment process regarding the 2024 AI? We ask that TDHCA and other involved agencies develop transparent processes to take in and respond to public comment that extends to other agencies beyond TDHCA.

## Serious fair housing concerns with the General Land Office

The GLO has repeatedly failed to fulfill their obligation to affirmatively further fair housing. Regarding the distribution of over $5 billion of CDBG-DR funds for recovery from Hurricane Harvey, the GLO failed to adequately respond to the disaster recovery needs of renters, who are disproportionately Black and Hispanic or Latino.[6] Only $250 million of these funds were allocated to the recovery needs of renters through the Affordable Rental Program, despite the GLO finding that renters' recovery needs totalled more than $1.85 billion.[7] Furthermore, while GLO homeowner programs tied benefits directly to impacted households, the GLO provided no similar mechanism to ensure that impacted renter households would be the direct beneficiaries of funding.[8] The GLO also failed to adequately provide Spanish-language translation of CDBG-DR Housing Guidelines.[9]

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[6] Cite Texas Housers Housing Discrimination Complaint, June 26, 2018
https://drive.google.com/file/d/1jdjbB8HNaTb1e0XcNy7VcYYV086Y6hiC/view
[7] Ibid.
[8] Ibid.
[9] Ibid.

Regarding the distribution of over $1 billion of CDBG-MIT funding for disaster mitigation funding in the wake of Hurricane Harvey, HUD has made a Letter of Finding that the GLO engaged in discriminatory activity that substantially disadvantaged Black and Hispanic or Latino residents eligible for funding. As stated in the HUD Letter of Finding,

> "First, GLO excluded areas designated by HUD as most impacted and distressed from competing for 50% of the Competition funds, though nearly 90% of the eligible population resided in those areas. Second, GLO scored applicants based on jurisdiction size, providing more points to a smaller jurisdiction than it would to a larger jurisdiction for an equivalent project. GLO utilized both of these criteria even though they disadvantaged areas with the greatest mitigation needs by GLO's own measure and ran counter to the intended focus on low- and moderate-income (LMI) households."[10]

Not only did these criteria counter the intended focus on LMI households and areas with the greatest mitigation need, but they also excluded areas that had significantly higher Black population shares to the benefit of areas that had significantly higher white population shares. HUD found that these criteria "disparately impacted minority residents."[11]

In the examples listed above, the GLO's own actions are on their face an impediment to fair housing.

## Balancing between access to opportunity and community development in low-income communities of color

The 2024 Texas AI must thoughtfully address the balance between opening up access to high opportunity areas for people of color and also to improve conditions in historically disinvested communities of color. Both of these activities are essential to increasing fair housing choice. After over a century of redlining, Jim Crow segregation, and ongoing exclusionary tactics, low-income Black and Hispanic or Latino Texans still are unable to access housing in areas with high incomes, good jobs, good schools, and good amenities. The segregation and exclusion of people of color from these high opportunity neighborhoods and communities did not happen by accident, but rather is the result of decades of action and inaction by government, private industry, and individuals.

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[10] Lewis, C. (2022). *Letter Finding Noncompliance with Title VI and Section 109*. U.S. Department of Housing and Urban Development. https://texashousers.org/wp-content/uploads/2022/03/HUD-Letter-Finding-Noncompliance-with-Title-VI-and-Section-109-.pdf, p. 2

[11] Lewis, C. (2022). *Letter Finding Noncompliance with Title VI and Section 109*. U.S. Department of Housing and Urban Development. https://texashousers.org/wp-content/uploads/2022/03/HUD-Letter-Finding-Noncompliance-with-Title-VI-and-Section-109-.pdf, p. 12

The 2024 AI must include actions that the State of Texas will take to open up access to high opportunity areas for low income people of color and to break down areas of racial and economic exclusion. Low-Income Housing Tax Credits (LIHTCs) administered by TDHCA must continue to heavily incentivize production in high-income, opportunity rich areas, many of which are also racially segregated. Some LIHTC stakeholders have in recent years attempted to begin to roll back regulations and incentives that work to prioritize low-income housing in high income, opportunity rich areas. The agency must commit to resisting these efforts on fair housing grounds. This is discussed in more detail below.

At the same time, many low-income Black and Hispanic or Latino Texans living in Racially or Ethnically Concentrated Areas of Poverty (RECAPs) seek tools and resources to improve their communities and to be able to avoid displacement so that they may enjoy those improvements. Some of these neighborhoods may face challenges such as poor and unsafe housing conditions, inadequate physical infrastructure, environmental hazards, poor schools, insufficient access to transportation and jobs, among others. All of the agencies included in the 2024 AI must consider the tools, resources, and strategies that they can deploy to support community development in these communities while avoiding the displacement of current residents. This approach must prioritize improving conditions and community outcomes. High quality rehabilitation of existing properties for low-income people may be a part of the solution, but simply concentrating income-restricted housing in these neighborhoods without improving community conditions and outcomes is not acceptable.

## Conditions at properties in TDHCA's portfolio

Black and Hispanic/Latino households are overrepresented among the households eligible for rental housing in TDHCA's portfolio. This means that the quality and conditions of properties in the portfolio should be treated in the AI as a fair housing consideration. The 2024 AI should include actions that ensure that physical inspections are thorough and accurate; that property condition complaints are addressed swiftly; that capital needs are identified and addressed; that rehabilitation is high quality; and that tenants at properties are given notice of failed inspections and other known concerns about conditions at their properties.

TDHCA has expressed a need to prioritize rehabilitation as a strategy for preservation of affordable LIHTC units. There is valid concern from tenants at HTC rehabilitation properties that current rehabilitation projects are inadequate and expose tenants to harmful living situations.

## Housing Choice Voucher discrimination

The state preemption ban on source of income protection and the state legalization of landlord discrimination against voucher holders is an impediment to fair housing choice and reduces voucher holders' - who are disproportionately people of color and other protected classes - access to exclusionary and high opportunity areas and communities. The recent Providence

Village HOA discrimination issue in Denton County[12] is just the latest illustration of the lengths that exclusionary communities and individuals will go to to keep low-income voucher holders out of their communities and to hoard opportunity.

Other steps that TDHCA and the State can take to expand voucher access in high opportunity, exclusionary areas include:
- Exploring programmatic and policy support for incentivization of landlord participation in voucher programs,
- Adopting Small Area Fair Market Rents (SAFMRs) that will open up more units in high opportunity areas to voucher eligibility,
- Strengthening affirmative marketing requirements and ensuring that properties in TDHCA's multifamily portfolio are working proactively with Public Housing Authorities (PHAs) to connect voucher holders with units at these properties, which must accept vouchers, and
- Reducing voucher turnback rates by working with and providing support and coordination for Public Housing Authorities across the state to ensure that voucher holders are being assisted in every way possible in successfully securing a unit that accepts their voucher.

## The State of Texas must fund deeply affordable housing

The State of Texas provides virtually no state funds for low-income rental housing and extremely low-income housing. Black and Hispanic or Latino households are overrepresented in these categories, as are other protected classes such as people with disabilities. By contrast, 72.2% of State funds administered by TDHCA - over $1.78 billion - go toward homeownership programs largely targeted to households making up to 115% of AMI,[13] higher than the extremely low-incomes and very low-incomes where there is the greatest need and where Black and Hispanic or Latino households are overrepresented.

Protected classes are disproportionately represented among the lowest-income levels that require subsidy in order to achieve housing affordability, and this lack of funding is an impediment to fair housing choice. The State of Texas must immediately and dramatically expand funding for low-income rental housing and housing for Texans with extremely low-incomes and very low-incomes. Two avenues for this are:

1) Expanding the state Housing Trust Fund and expanding the use of these funds to include low-income rental housing and housing for those with extremely low-incomes and very low-incomes; and
2) Expanding the State Housing Tax Credit.

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[12] Fechter, J. (2023, July 7). Texas bans homeowners' associations from discriminating against renters who receive federal housing aid. *Texas Tribune*. https://www.texastribune.org/2023/07/07/texas-hoas-housing-section-8/
[13] Texas Department of Housing and Community Affairs. (2023). *2023 State of Texas Low Income Housing Plan and Annual Report*. https://www.tdhca.state.tx.us/housing-center/docs/23-SLIHP.pdf, p. 50

With both approaches, it is essential that funding is targeted to lowest-income housing affordable to households with incomes between 0-30% AMI and 30-50% AMI.

## Eradicating exclusion through the Housing Tax Credit program

Recent reports have celebrated LIHTC awards for defying misconceptions that tax credit properties concentrate poverty and further segregation.[14] It is true that more recent HTC cycles in Texas have improved in awarding developments in lower-poverty areas, but long-term, ongoing concentration is still a concern. Focusing on recent improvements ignores the fact that most HTC units in Texas are still in tracts with lower incomes and fewer white residents. A review of the 2022 Housing Sponsor Report shows that the share of Black/African American HTC residents that live in low income, majority non-white census tracts is larger than those of other racial and ethnic groups. The fact that Black or African American residents and those with incomes at or below 30% AMI are more often in lower-quality tracts raises concerns that these residents are benefitting less from recent improvements to HTC awards than other tenants.

Avoiding concentrations of affordable housing, which typically involves incentivizing HTC development in high-opportunity, exclusive areas, has been found to be associated with HTC awards in low-poverty neighborhoods.[15] This is extremely beneficial for tenants who may be harmed by living in high-poverty neighborhoods. Residents of high-poverty neighborhoods have poorer health outcomes and self-rated health than those in low-poverty neighborhoods.[16] Neighborhood poverty during childhood also negatively impacts high school graduation rates and annual earnings.[17] Children who moved to lower-poverty neighborhoods when they were young experienced improved college attendance rates and earnings, were more likely to live in better neighborhoods as adults, and were less likely to become single parents.[18] Growing up in a high-poverty neighborhood can even inhibit self-control.[19]

[14] Shelburne, M., & Lawrence, P. (2022, April 20). Dispelling Oft-Repeated Misconception, Analysis Shows LIHTC-Financed Properties are Not Concentrating Poverty or Furthering Racial Segregation. *Affordable Housing Resource Center*. https://www.novoco.com/notes-from-novogradac/dispelling-oft-repeated-misconception-analysis-shows-lihtc-financed-properties-are-not-concentrating

[15] US Department of Housing and Urban Development. (April 7, 2015). Effect of QAP Incentives on the Location of LIHTC Properties. Office of Policy Development and Research. https://www.novoco.com/sites/default/files/atoms/files/pdr_qap_incentive_location_lihtc_properties_050615.pdf

[16] Yang, Tse-Chuan, and Scott J. South. (August 2020). "Neighborhood Poverty and Physical Health at Midlife: The Role of Life-Course Exposure." *Journal of Urban Health*. 97(4), pp. 486–501.

[17] Galster, George, et al. (September 2007). "The Influence of Neighborhood Poverty During Childhood on Fertility, Education, and Earnings Outcomes." *Housing Studies*. 22(5), pp. 723–51.

[18] Chetty, R., Hendren, N., & Katz, L. (2016). The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Project. *American Economic Review*, 106(4). https://scholar.harvard.edu/hendren/publications/effects-exposure-better-neighborhoods-children-new-evidence-moving-opportunity

[19] Tomlinson, Rachel C., et al. (April 2020). "Neighborhood Poverty Predicts Altered Neural and Behavioral Response Inhibition." *NeuroImage*. 209, p. 116536.

To ensure that tenants who are members of protected classes benefit from positive outcomes, TDHCA and the State must block efforts to water down provisions that support fair housing choice, such as attempts to weaken "Underserved" provisions in the QAP.

## Continue to enforce requirement for sharing fair housing information

TDHCA recently posted updated Previous Participation and Executive Award Review and Advisory Committee rules for public comment. 10 TAC §1.301(c)(4) of this section of code allows TDHCA to ignore the failure to provide Fair Housing Disclosure notice when conducting a previous participation review, which is satisfied by providing the Tenant Rights and Resources Guide. This document has integral information for tenants. The provision of these materials aligns with Recommendation 2 in the 2019 AI, to "Increase the provision of educational resources to the developer, property manager, and tenant communities, and to the mortgage lending and realtor industries"[20] and should not be allowed to be ignored. TDHCA must take this action and others to ensure that tenants at properties in their portfolio have access to the resources they need to understand their Fair Housing rights.

## Remove unnecessary screening criteria

Supportive Housing is designed to serve vulnerable populations, such as people with prior evictions and criminal records, and providers should have the freedom to provide housing without additional restriction on residents' past. Such policies create barriers for the very people meant to benefit from supportive housing and can ultimately have a discriminatory effect on the basis of race.[21] Formerly incarcerated people are more than 10 times more likely to be unhoused than the general public.[22] Persons experiencing and at-risk of experiencing homelessness are targeted populations for Supportive Housing under the QAP, and multiple provisions in the QAP incentivize providing housing for this population. This also has the effect of excluding a disproportionately minority population from Supportive Housing. The current QAP goes beyond the Tenant Selection Criteria requirements in 10 TAC §10.802 to the detriment of tenants targeted for assistance and protected classes.

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[20] *State of Texas Analysis of Impediments to Fair Housing Choice 2019*. (2019). Texas Department of Housing and Community Affairs. https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-Final.pdf, p. 488

[21] Rosie Truelove. (2022, March 28). Response to Resolution No. 20200611-094: Tenant selection policies and procedures for individuals with prior convictions or evictions. https://services.austintexas.gov/edims/document.cfm?id=379792
Kanovsky, H. R. (2016). Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions. U.S. Department of Housing and Urban Development. https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF

[22] https://www.vera.org/downloads/publications/Opening-Doors-to-Affordable-Housing-Report.pdf

## Survey tenants regularly and expand the ability of tenants to meaningfully participate in decision making

TDHCA (and other agencies) must survey tenants at properties in their portfolio regularly. Outreach to tenants in recent years has been sporadic at best. It is no secret that there is a huge chasm between the experience and expertise between tenants and LIHTC developers. Input from the latter group, as well as other professionals that have technical expertise but almost always do not have lived experience, are heavily prioritized in TDHCA meeting formats, public comment, and culture. TDHCA and other state agencies must dramatically shift this mindset and begin to take action that shows that they consider low-income people themselves as a primary stakeholder in decision making.

TDHCA should consider:
- Setting a regular survey schedule;
- Partnering with academic projects and departments to survey tenants;
- Ensure that survey topics are updated to reflect current issues and needs; and
- Embark on deeper reflection and changes to meeting formats, public comment approach, and organizational culture to carve out a central role for low-income tenants themselves, who are disproportionately people of color and other protected groups, in decision making.

## The impact of NIMBYism on general population and elderly properties

As noted in the 2019 AI, many communities are only willing to support properties for older Texans. A review of the TDHCA Property Inventory shows that many cities that exclusively receive awards for elderly-only properties are in high income, majority white neighborhoods (such as in Lufkin, Waco, and Plano). This is an ongoing issue, not just a matter of older awards. In addition to the places mentioned, College Station, Tyler, Beaumont, and Longview have followed the same patterns since 2017, and the majority of HTC units awarded in high income, majority white tracts in Houston since 2017 have been for elderly tenants. TDHCA must ensure that exclusionary, high opportunity neighborhoods and communities where there is NIMBY opposition to low-income housing are not able to fulfill their share of low-income housing by just taking elderly properties. This outcome has a discriminatory impact on the basis of familial status and other protected classes.

## Recent state actions to preempt landlord-tenant law have a negative impact on fair housing.

In the most recent legislative session, the Texas Legislature preempted local governments in the state from passing eviction prevention measures as part of the "field preemption" bill, and failed to replace local laws with any kind of state framework for eviction protection, which could have taken the form of funding, a meaningful "opportunity to cure" period, and other reforms. Research shows that evictions are more likely to be filed against Black and Hispanic or Latino

renters and women, even at a single property.[23] Preempting local eviction prevention measures and tenant protections disproportionately impacts people of color, women, people with disabilities, and other protected groups. Texas must either repeal the preemption of local eviction prevention and tenant protection ordinances, or else provide meaningful protections statewide. This should also include eviction prevention policies in properties in the TDHCA rental portfolio.

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[23] Hepburn, P., Louis, R., & Desmond, M. (2020). Racial and Gender Disparities among Evicted Americans. *Sociological Science*, *7*, 649–662. https://doi.org/10.15195/v7.a27

# Appendix H - Public Comment

TDHCA, GLO, and TDA read all public comment received during the public comment window. No comments were received during the public meetings held to solicit public comment. However, 18 comments were received by email, letter, or via the public comment page on the TDHCA website. All 18 comments received a reasoned response. Please see Chapter 1 for more discussion of these comments and the reasoned responses to them.

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May 3, 2024

Ms. Elizabeth Yevich, Director
Texas Department of Housing and Community Affairs
Attn: Housing Resource Center
P.O. Box 13941
Austin, Texas 78711-3941

*Sent via email to: fair.housing@tdhca.texas.gov*
RE: Comments on Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice

Dear Director Yevich:

AARP Texas, on behalf of its 2.5 million members, appreciates the opportunity to comment on the Texas Department of Housing & Community Affairs (TDHCA) Draft 2024 Texas Analysis of Impediments (AI) to Fair Housing Choice. AARP applauds TDHCA for identifying new impediments to fair housing in the draft and encourage them to continue to explore opportunities and adopt initiatives to advance housing choice and fair housing in Texas.

Many of the recommendations below discuss the needs of the 65-plus population, and those needs closely overlap and are closely linked with impediments to fair housing for protected classes. The 65-plus population is the fastest growing segment of the state's population and is expected to become more racially and ethnically diverse. Between 2020 and 2030, the number of new older Texans will increase by nearly 3 million and by 2050, one in five Texans will be over 65. Our existing housing stock — in terms of options, affordability, and accessibility — is ill-suited to meet the housing needs of an increasingly older population that overwhelmingly wishes to age in place.

The COVID-19 pandemic and the subsequent economic downturn exacerbated housing challenges, especially for people with low incomes and communities of color. These groups often face disparities in access to high-quality health care and education, job opportunities that pay living wages, affordable and safe housing located near transit options, and economic opportunities. The pandemic has also underscored the importance of living in a community that supports the housing needs of older adults and offers a variety of amenities and services that promote healthy aging.

AARP Texas encourages TDHCA to adopt the following recommendations to its AI:

- **Create a Permanent Home Repair & Modification Program.** Seventy-seven percent of older adults want to remain in their homes and communities as they grow older. While leveraging housing funds for housing rehabilitation, we encourage TDHCA to create a permanent home repair and home modification program to eliminate or reduce barriers to remaining in your home as people get older. These problems are particularly critical for older adults from racial and ethnic groups that are discriminated against, rural residents, and women who live alone.

- **Ensure Safe Housing Conditions.** All housing needs to be safe. Low-quality housing can pose risks to residents' health and safety, particularly vulnerable populations such as older adults. Lack of maintenance in apartment complexes and condominium buildings can be extremely dangerous. They can lead to fires and other hazards that are especially harmful to older adults and people with mobility challenges, who may not be able to escape quickly. Regular inspections are important to ensuring housing safety, along with the regulatory authority to require necessary repairs to be made. Renters may be reluctant to report unsafe features or conditions for fear of retribution and lose their housing. We encourage that the state's AI ensures that physical inspections are thorough and accurate, property condition complaints are addressed swiftly, capital needs are identified and addressed, and rehabilitation is high quality. We also believe that tenants at properties should be given notice of failed inspections and other known concerns about conditions at their properties. Furthermore, TDHCA's Housing Program and Portfolio Analysis should include a discussion of inspection scores, violations, and tenant and neighborhood populations and ideally, data enabling that analysis would be made publicly available. This analysis would help ensure that members of protected classes are not denied equal access to quality housing.

- **Further Address the Impediment of Eviction.** Twenty-three percent of extremely low-income households in Texas are seniors, and the vast majority of this segment spends at least half of their income on rent and utilities. Older Americans of color are disproportionately represented among these older renter households. People with high housing-cost burdens may be at risk of eviction and displacement if appropriate tenant protection laws are not in place.

  In the draft AI, TDHCA effectively describes how evictions are a barrier to protected classes, but evictions are not mentioned in Chapter 11, Impediments to Fair Housing Choice. Texas was one of the few states that effectively used its COVID-era funding for Emergency Rental Assistance (ERA) and Homeowner Assistance Funds (HAF), which was beneficial to landlords, tenants, and owners. We would encourage TDHCA to recommend the development of a plan to make these programs permanent, in addition to sustaining other COVID-era programs, like eviction diversion programs, right to counsel for tenants, and landlord/tenant mediation programs.

- **Encourage Universal Design.** Harvard Joint Center for Housing Studies (2022) found that less than 4% of housing in the country offer no-step entry, single floor layout, and wheel-chair width hallways and doors, which poses a challenge for those who develop problems with mobility or other limitations and disabilities. AARP Texas encourages TDHCA to

establish requirements or provide incentives for universal design features to be incorporated into housing development programs for new construction and rehabilitation of existing structures. Housing that is built for everyone, including people with disabilities, allows individuals to remain in their homes as their needs change. For example, people who use mobility devices such as walkers and wheelchairs need housing with no steps at the entrance, wide doorways and hallways, and an accessible bathroom at the ground level. These features are also attractive to people who do not have mobility limitations but are members of protected classes, such as parents with young children using strollers.

- **Address Housing Voucher Discrimination.** Source of income is not a protected class at the federal level. Therefore, it is incumbent upon local and state governments to protect a person from being discriminated upon the basis of their lawful source of income. Often times such discrimination leads to individuals and family being rejected from obtaining housing, thereby creating a cycle of homelessness. Voucher holders are disproportionately members of protected classes. The states' preemptive ban on source-of-income discrimination ordinances is an impediment to fair housing choice and makes it harder for older adults and others to find housing that is affordable and appropriate. We urge TDHCA to provide guidance in relation to source of income discrimination in housing. Housing vouchers are particularly helpful when they are used in high-opportunity neighborhoods with proximity to jobs, medical facilities, and other amenities of a livable community.

- **Expand Deeply Affordable Housing.** Extremely low-income renters are more likely to be older adults than the general population and also more likely to be members of protected classes. Thirty percent of extremely low-income households in Texas are an older adult, and we can assume this number will increase steadily as the number of older adults grows in our state. Older renters tend to be more rent-burdened than younger renters, which leaves very little money for other necessities, such as food and health care. We would encourage TDHCA to develop strategies to grow the development of units for extremely low-income renters. Furthermore, we support more construction of affordable housing in areas which have historically seen a lot of displacement of long-term residents due to being priced out, in both urban and rural areas.

- **Grow Non-Traditional Housing.** Most communities are designed with one housing type in mind. For example, some suburbs allow just single-family residential homes. In these communities, zoning does not include other housing types, such as duplexes and apartment buildings. This can make it difficult for people with low and moderate incomes to afford to live there. It also provides fewer options for those who may need a different housing type to meet physical needs or preferences. We urge TDHCA to promote access to more housing options, including accessory dwelling units (ADUs), manufactured housing, and other forms of middle housing. Having a variety of housing options provides greater choices in neighborhoods. This allows residents to have a better chance of finding housing they can afford in a location that meets their needs.

**Contact:** For questions, please contact Stephanie Mace, associate state director of advocacy and outreach with AARP Texas, at 979.224.0766 and smace@aarp.org.

Dear TDHCA,

My name is Donna Pryor, and I am a voucher holder advocating for fair housing policies that benefit low-income families in our state. I am deeply concerned about the current disparities in housing opportunities and believe that addressing these issues is essential for creating a more equitable society.

It is evident that the state of Texas has failed to adequately address the need for affordable housing in well-resourced areas. The lack of tax credit properties in these areas perpetuates economic and racial segregation and limiting their access to quality housing, education, and employment opportunities. This failure to deconcentrate poverty undermines the principles of fair housing and perpetuates systemic inequalities.

Texas hasn't done enough to provide affordable housing in well-resourced areas. Without affordable options there, it keeps low-income families separated making it harder for us to access good housing, education, and jobs. This keeps poverty concentrated and makes inequality worse.

Access to affordable housing in high opportunity areas is crucial for the well-being and upward mobility of low-income families. These areas typically offer better schools, healthcare facilities, job opportunities, and community resources, which are essential for breaking the cycle of poverty and promoting social and economic integration. By investing in affordable housing initiatives in high opportunity areas, we can provide low-income families with the resources and support they need to thrive.

As a voucher holder, I have personally experienced the challenges of finding safe and affordable housing in well-resourced areas. Many low-income families, including voucher holders, are forced to reside in low-income neighborhoods with limited access to essential services and opportunities. By advocating for more affordable housing in high opportunity areas, we can expand housing options for voucher holders and low-income families, enabling them to live in communities that offer greater opportunities for success and upward mobility.

As a voucher holder, I've struggled to find safe, affordable homes in well-off areas. Many low-income families, like us, end up living in poorer neighborhoods with fewer opportunities and dysfunctional school systems. By pushing for more affordable housing in better areas, we can give families like ours better chances to succeed and move up.

I urge TDHCA to prioritize developing tax credit properties in well-resourced areas and implementing strategies to deconcentrate poverty. Investing in affordable housing in high opportunity areas creates more equitable communities and helps low-income families thrive.

TDHCA should focus on building affordable homes in better areas to help reduce poverty. This will help everyone in our communities have a fair chance to do well.

Thank you for your attention to this important matter. I look forward to seeing positive action taken to address these critical housing issues and promote fair housing opportunities for all residents of our state.

Thank you and God bless,

Donna Pryor

May 3, 2024

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**Texas Appleseed Comments on the Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice**

Thank you for the opportunity to comment on the Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice (AI). Texas Appleseed is a non-profit public interest law center whose mission is to promote social, racial, and economic justice for all Texans by changing unjust laws and policies that prevent Texans from realizing their full potential. Appleseed has worked on disaster recovery and fair housing issues in Texas since Hurricane Rita in 2005, including the siting of public and affordable housing, fair distribution of federal disaster recovery funding, infrastructure equity, and environmental justice.

We note that while we, and other fair housing organizations, would be more than happy to coordinate with the Texas General Land Office (GLO) in conducting Affirmatively Furthering Fair Housing (AFFH) reviews of federally funded disaster recovery and mitigation programs and projects, Texas Appleseed is not currently doing so. We request that the language on page 221 stating that we are part of GLO's AFFH review process be removed from the Draft AI.

The federal government's failure to issue a final AFFH rule has left recipient jurisdictions with insufficient and unclear guidance about how to conduct fair housing planning that identifies impediments to fair housing choice and selects the actions the jurisdiction will take to overcome those impediments. While this failure makes the recipient's job more

difficult, the duty to AFFH remains a legal obligation under the Fair Housing Act and a prerequisite to eligibility for federal funding.

We also note that what the state refers to as the July 31, 2021, Interim Final Rule was actually published as an Interim Final Rule on June 10, 2021 and went into effect as a Final Rule on July 31, 2021. While the February 9, 2023, proposed rule, which lays out a core planning process, is not final, the provisions of the June 10, 2021 interim final rule, relating to AFFH definitions and certifications, are now federal regulations.

24 CFR 5.151 defines affirmatively furthering fair housing as,

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

While federal regulations may not require a specific planning process, they are clear about what the obligation to AFFH requires. The Draft AI fundamentally misunderstands the scope of the AFFH obligation and the requirements of an AI.

This is the State of Texas's AI, not TDHCA's AI or even TDHCA, HHS, GLO, and TDA's AI. The State of Texas is the recipient of federal funds, the State of Texas signs the certifications, and the State of Texas is responsible for conducting an AI, taking appropriate and meaningful actions to overcome the effects of identified impediments, and keeping records documenting those actions. As HUD's 1996 Fair Housing Planning Guide reminds grantees:

> Although the grantee's AFFH obligation arises in connection with the receipt of Federal funding, its AFFH obligation is **not restricted to the design and operation of HUD-funded programs at the State or local level.** The AFFH obligation

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extends to all housing and housing-related activities in the grantee's jurisdictional area whether publicly or privately funded. (FHPG at 1-3, emphasis added)

The Draft AI's attempt to limit the scope of the state's AFFH obligation to: 1) state agencies that receive HUD Community Planning and Development (CPD) funds; 2) impediments to fair housing choice that are within the control of those agencies; and, 3) solutions that can be funded with CPD grant funds, renders the Draft AI unable to support a certification that the jurisdiction is compliant with the legal obligation to AFFH.

Whether or not the grantee has the power to overcome a particular impediment - we understand, for example, that the state cannot commit to legislative action - the impediment must be included in the AI.

Even within the limited scope of the Draft AI, the analysis is incomplete and largely limited to programs and activities conducted by TDHCA. There is no analysis of the annual CDBG program administered by TDA, how and where those funds are being used, who they are benefitting, or whether the agency's administration of those funds, for example, its method of allocation, might be having a discriminatory effect or conversely, efficiently allocating resources to redress historical disinvestment and ensure access to opportunity.

Nor does the AI contain an analysis of the CDBG-DR and MIT programs administered by the GLO or include the fact that several of these programs were the subject of a Fair Housing Complaint that resulted in a finding of noncompliance by HUD.  We note that Chapter 5 does not, in fact, include any administrative complaints filed with HUD.

The public outreach and consultation process for the Draft AI was insufficient, and the description of that process is misleading. Posting a Google Form survey (which resulted in fewer than 10 written responses) and adding a discussion of the Draft AI to the agenda of two council meetings run by TDHCA not consultation and can barely be considered outreach. While the lack of public input, particularly from members of protected classes, is a flaw in the Draft AI, more concerning is that the state appears to be representing that input received during the much more open and robust public input process for its 2019 AI as new and relevant information. While impediments to fair housing choice persist over time, the point of updating fair housing planning every five years is to account for changes to existing impediments, the emergence of new

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impediments, and new strategies to address impediments. For example, the last five years have seen a massive federal investment in broadband access, providing new resources to address those needs for underserved communities.

The Draft AI fails to include specific commitments to meaningful actions that will address significant disparities in housing needs and in access to opportunity. It does not indicate which agency is responsible for taking specific actions or provide any time frame for action for the recommendations it does include.

The six main impediments the AI identifies are barriers to fair housing choice in Texas. They are also almost exclusively focused on housing units and housing programs. Affirmatively furthering fair housing  is about much more than physical housing, it requires jurisdictions to "address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." (25 CFR 5.151) Unless jurisdictions assess and address the interrelated issues, from NIMBYism to school quality, access to transportation, and exposure to environmental hazards, that act as impediments to fair housing choice, they are not in compliance with the obligation to affirmatively further fair housing, and more importantly, will not make meaningful progress towards overcoming these barriers and ensuring that all Texans can live in safe, healthy, communities with real access to opportunity.

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**cdcb | come dream. come build. Public Comment on Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice**

cdcb | come dream. come build. has spent the last 50 years dedicated to improving the lives of families in the Rio Grande Valley. This is Region 11, according to TDHCA's 2024 Analysis of Impediments to Fair Housing Choice. This includes the cities of Del Rio, Laredo, Harlingen, Brownsville, McAllen, and South Padre Island.

## Combating Severe Poverty

Given that Region 11, encompassing the South Texas border, bears the burden of being the poorest region in Texas, with a poverty rate double the state average, prioritizing targeted investment in affordable housing becomes vital. Affordable housing is not only a solution to shelter needs but a key tool in the fight against poverty and wealth building in our region. By ensuring affordable housing options are available, individuals and families can alleviate the strain of high housing costs, freeing up finances for other necessities like healthcare, education, and food. Additionally, affordable housing initiatives can stimulate economic growth by attracting businesses and creating job opportunities, further uplifting the community. By investing in affordable housing, TDHCA can directly address the root causes of poverty in Region 11, fostering resilience and prosperity for our residents.

## Age of Housing Stock

According to the "Age of Housing Stock" map provided by TDHCA, 9%-50% of housing stock in Region 11 is over 54 years old. TDHCA must prioritize housing preservation efforts in Region 11, particularly considering the severe shortage of affordable housing stock. The region faces a significant challenge with limited availability of affordable housing options, exacerbating housing insecurity and affordability issues for its residents. By focusing on housing preservation, TDHCA can mitigate the impact of this shortage by safeguarding existing affordable housing units from deterioration, conversion, or redevelopment. This proactive stance is crucial in addressing the pressing need for affordable housing in Region

11 and ensuring that low-to-moderate-income individuals and families have access to stable and affordable housing options.

**Colonia Self-Help Centers**

TDHCA must improve upon the quality of its Colonia Self-Help Centers by actively seeking community input and refining its programs to better align with the evolving needs of colonia communities. By engaging residents in the decision-making process, TDHCA can gain valuable insights into the specific challenges and priorities of these underserved communities. This feedback can then inform the development of tailored programs and services that are more responsive and relevant to the unique circumstances of colonia residents.

Additionally, increasing the capacity of the self-help centers is crucial to meet the growing demand for services and the intricacies of each colonia. This could involve expanding physical infrastructure, hiring more staff members, or establishing satellite locations in Hidalgo, Starr, and Cameron Counties. By increasing capacity, TDHCA can ensure that its Colonia Self-Help Centers are better equipped to serve a larger number of residents and provide more comprehensive support to the community. By prioritizing community input, adaptability, and capacity building, TDHCA can strengthen the effectiveness and impact of its Colonia Self-Help Centers, ultimately empowering residents and fostering positive change within these communities.

**Public Input**

Finally, TDHCA should prioritize a commitment to conducting more comprehensive surveys and actively engaging in gathering public input at tax credit properties to aid in their Analyses of Impediments. This includes not just tenants of tax credit properties, but also colonia residents. This approach would foster a deeper understanding of community needs and preferences, ensuring that decisions align closely with the interests of those affected. Tenants are experts on their experiences in tax credit properties and by embracing robust data collection methods and prioritizing community engagement, TDHCA can better serve the diverse populations it aims to support through its programs and initiatives.

**Disability Rights Texas Comments re:**
**2024 Draft State of Texas Low Income Housing Plan and Annual Report**

Disability Rights Texas (DRTx) is Texas' federally-designated Protection and Advocacy (P&A) agency for persons with disabilities. We provide a wide range of services for people with disabilities to ensure that their rights are upheld and that they are not discriminated against based on their disability. We also work to ensure that the needs of people with disabilities are met so that they can live as independently as possible.

The Texas Analysis of Impediments (AI) is a critical document that is meant to illustrate the state's vision for affirmatively furthering fair housing over the next five years. Per the AI, Texas "uses this planning process to take a meaningful role in affirmatively furthering fair housing choice for Texans." The AI is a tool TDHCA and partner agencies should use to inform a variety of stakeholders of the measurable actions they mean to take to improve housing outcomes for protected classes by eliminating impediments, and ensure that the state's focus is on housing choice and equity. Below are our thoughts regarding the 2024 Draft AI.

**The 2024 Draft AI Input Process was Extremely Limited**
The input process for the 2024 Draft AI was extremely limited, especially when compared to the input process from the previous AI cycle in 2019. In 2019 more than 40 separate consultations were held across the state to solicit input from as broad a swath of people as possible: close to 500 people attended these consultations. Media advisories were issued highlighting the process, 4 agency-based stakeholder meetings as well as email blasts alerting people to the input opportunity. Information gathered was distilled into almost 50 clearly-identified trends seen by low income tenants across the state. On the other hand, the only forms of public consultation used to draft the 2024 AI were email blasts alerting people to an online Google form that could be filled out, and 2 agency stakeholder meetings. There were 0 separate consultations and all efforts resulted in only 4 trends from public consultation in the 2024 Draft AI.

It is clear that the lack of in-person consultations resulted in a significantly smaller amount of input to the 2024 Draft AI. Focusing only on internet-based input opportunities is extremely problematic for the population this report is meant to highlight. It is not uncommon for low income tenants to lack reliable access to computers or stable internet connections, especially people with disabilities who may need additional accessibility requirements, like assistance physically getting to a machine. The likely result of 0 in-person consultations is the exclusion of input from low income tenants.

**Evictions are not Considered an Impediment to Fair Housing in the 2024 Draft AI**
One of the primary reasons people with disabilities contact Disability Rights Texas is for help preventing an eviction, largely due to nonpayment of rent, largely in TDHCA-monitored properties. It is not uncommon for people with disabilities to fall behind on rent due to situations out of their control, including costly health-related complications, hospitalizations or needing to care for a sick family member. Evictions can have a devastating impact on a person's ability to not only maintain housing stability, but to gain housing in the future. Currently, when an eviction is filed in Texas, it remains on a person's record for the foreseeable future regardless of the outcome of the hearing. This means that a person could be found not at fault, but still have an eviction on their record. Evictions are a common barrier to housing for protected classes.

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TDHCA provides ample evidence in the 2024 Draft AI that eviction is a limit to mobility and housing choice for protected classes, including in the pandemic response section; DRTx was very involved with pandemic-related housing response. However, despite all of the discussion and data, eviction is not mentioned as an official impediment to fair housing choice. Eviction is the ultimate housing displacement for protected classes, and should be included as an impediment to fair housing.

**Source of Income Discrimination is not Addressed in the 2024 Draft AI**
Source of Income (SOI) discrimination is another major issue preventing people with disabilities from securing safe, affordable housing in the community of their choice. Traditional SOI discrimination allows landlords to refuse to rent to voucher holders, eliminating rental housing protections from this specific population. Voucher discrimination has sweeping impacts on protected classes. Voucher programs are extremely competitive: people often wait many years to get to the top of the waiting list. Once a person finally secures a voucher they only have a short period of time to find a unit that will accept their voucher; if they can't, they must surrender the voucher and drop down to the end of the list. It is also important to note that people with disabilities experience SOI discrimination acutely as discrimination against disability-related income, like social security assistance, is also a problem.

The AI should include actions the agency can take to combat the impacts that SOI discrimination has on protected classes. Some meaningful suggestions were made by organizations providing initial comment to the draft AI, including exploring ways to incentivize landlord participation, and working with Public Housing Authorities (PHAs) to reduce voucher turnback rates, something that is particularly concerning for the disability community. However, these comments were dismissed. Taking any number of units offline is a clear impediment to fair housing for protected classes, including people with disabilities who already have difficulty finding an accessible place to live: the shortage of accessible units is mentioned in the AI.

**The AI does not Accurately Describe Policies that Impact Some of the Greatest Impediments to Fair Housing**
Chapter 4 of the AI is a review of state-level laws and regulations that could have the effect of limiting housing for protected classes. However, multiple policies that have direct impacts on fair housing impediments are not included. As we mentioned in our previous comments, 88R HB 2127, the field preemption bill enacted by the 88th Legislature, drastically limits housing for protected classes by preventing local governments from enacting ordinances to benefit their own citizens. This legislation has a direct and disparate impact on people with disabilities, especially with regard to housing, because it invalidates previously enacted ordinances providing eviction protections.

As mentioned previously, evictions, largely for nonpayment of rent, greatly impact people with disabilities: this is especially true for people experiencing mental illness. City eviction prevention ordinances protected people with disabilities in situations like these; however, after the passage of HB 2127, they no longer do. Right to cure periods also played a critical role in helping protected classes remain housed, and we echo our colleagues at Texas Housers regarding the importance of right to cure periods.

Chapter 4 of the AI cites the portion of government code that prevents municipalities from passing policies disallowing SOI discrimination (84R SB 267), and includes details of the court case filed against enforcement of the law. One of the major themes of the AI is a lack of accessible units available to protected classes. Source of Income discrimination contributes to this shortage because, as long as these discriminatory policies are in place, people with disabilities will continue to have fewer units available to them.

The conclusion of Chapter 4 states that "Texas state laws and programs provide significant considerations for protected classes and do not reflect discriminatory practices:" we disagree. HB 2127 and policies permitting

SOI discrimination have clear, disparate impacts on protected classes, including people with disabilities. It is accurate that these policies are part of statute, but that does not make them any less of an impediment to protected classes achieving housing stability, or being fairly treated when it comes to securing a place to live. TDHCA needs to explicitly recognize these policies as impediments to affirmatively furthering fair housing, and think creatively about activities to move the needle forward.

**NIMBYism is not Sufficiently Addressed in the AI**

"NIMBY syndrome" is one of the primary concerns impacting housing outcomes for protected classes. Multiple NIMBY practices are mentioned in the AI: the citing of far more elderly properties in high opportunity areas than general multifamily; local governments having tremendous sway over application submissions; zoning that blocks group homes and recovery homes that explicitly benefit people with disabilities; and other factors resulting in a dwindling amount of land/neighborhoods where LIHTC developments can be realistically constructed. The AI makes very clear that NIMBYism is a barrier to fair housing.

However, despite the evidence presented in the AI, recommendations on how to remove this barrier to fair housing are, by the agency's own admission in initial AI comments, crafted in a way to not inflame outspoken NIMBY groups. The AI is a document used to educate policymakers who have power over TDHCA fair housing policies, specifically some of these problematic NIMBY issues. Making weak recommendations with the intention of not rocking the boat does not affirmatively further fair housing, and serves to lessen the perceived severity of this impediment. TDHCA should include forward-thinking solutions to negate the impact NIMBYism has on the citing of LIHTC properties. Solutions can include studying trends in how various sorts of local government/organization support have impacted the application and citing process of LIHTC properties, and, as the authority in LIHTC development, thinking creatively about ways to better engage and educate NIMBY groups.

**Concerns Over a Lack of Affordable, Accessible Housing due to Problematic Physical Inspections**

Over the past year, inspection policies for accessible units in the TDHCA portfolio have become a concern. There are developments that have been allowed to operate as normal despite serious accessibility violations, such as mobility-accessible units having stairs, and developers with a history of accessibility violations not being held accountable for their actions.

Additionally, due to the policy of inspecting only a 20% random selection of units for 3-year monitoring, and historical reliance on third-party inspections, many properties have accessible units that were never inspected by TDHCA before being put into service. There are no policies in place to be sure that accessible units are inspected at all. This results in accessibility issues that impact tenants with disabilities' safety and quality of life.

TDHCA has the responsibility of ensuring that all units in their portfolio are of high quality and up to accessibility standards so that people with disabilities do not face further barriers to fair housing. It is critical that the AI include steps the agency will take to make certain that physical properties do not, themselves, become barriers to fair housing, including more aggressive timelines for corrective action and creating a policy to inspect all accessible units placed in service with third party final physical inspections.

**Disaster is a Disability Issue**

Severe weather, pandemics and other disasters are becoming more common. When the power goes out, the roads ice over or the water rises Texans are left with few options but to simply make due. However, people with disabilities are disproportionately impacted when disasters strike, suffering far worse consequences than the general population. According to Census Bureau data released in January 2023, 74% of people who can't walk experienced a lack of access to food one-month after a disaster vs. only 9% of people with no physical

limitation.[1] Additionally, people with disabilities are far more likely to have to evacuate their homes than the general population. Data indicates that 59% of people who are deaf never returned home after an evacuation, which is quadruple the number of people in the general population.[2] Permanent evacuation often leads to institutionalization, an unacceptable outcome for people with disabilities.[3] These outcomes reflect a clear impediment to fair housing experienced by people with disabilities.

The AI draft recommends that the GLO disaster recovery funding, which has been scrutinized due to the inequitable way it was distributed during Hurricane Harvey, be focused on areas that are "seeing rapid demographic shifts, such as more rural areas," largely to support people who are elderly or have disabilities. DRTx is in full support of any funding to assist people with disabilities in achieving housing stability. However, people with disabilities often want or need to live in urban areas where they have access to the services they require to live independently in the community, something the AI does not sufficiently highlight. Any housing funding for people with disabilities, whether disaster or otherwise, should be distributed equitably and in a way that best combats displacement.

**Other Areas of Concern**
*Shifting of Responsibilities from TDHCA to Advocacy Groups*
In the AI TDHCA recommends that the agency "assess the impact of reducing the array of services provided to tenants for which the property can receive points in the QAP" in favor of focusing on "higher quality and more impactful services." To achieve this goal, TDHCA suggests that "advocacy groups…become an important part of providing meaningful services like child care in LIHTC properties." This recommendation serves to shift responsibility from the agency to local advocacy groups who may or may not have the capacity to provide said services; the funding to commit to this work; and they may not even be available in all areas of the state where services are needed. This is not an acceptable solution to remove fair housing barriers.

*Criminal History is a Barrier to Fair Housing*
We echo our colleagues at Texas Housers in supporting the AI recommendation to research and assess the use of criminal background screenings as a way to meaningfully examine the necessity of all screening criteria, especially with regard to supportive housing developments. Criminal history policies are a serious concern for the disability community. Oftentimes, especially in environments without robust services, people with disabilities become justice-involved due to criminal offenses directly related to their disability. We see this most frequently with people experiencing mental illness who are in crisis. Individuals with disabilities, including those with a diagnosis of mental illness, and individuals with substance use concerns are disproportionately overrepresented within the criminal justice system. Criminal history policies in employment and housing contribute to this cycle of endless barriers to stable, fair and often life-saving housing.

Please contact Tanya Lavelle with any questions at tlavelle@drtx.org

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[1] US Census Bureau. (Jan. 5, 2023). Week 52 Household Pulse Survey: Dec. 9 – Dec. 19th . Available from: https://www.census.gov/data/tables/2023/demo/hhp/hhp52.html
[2] Ibid.
[3] Kahn, Debra; Wolman, Jordan. (Jan. 6, 2023). Disaster is a Disability Issue. Politico. Available from: https://www.politico.com/newsletters/the-long-game/2023/01/06/disasters-are-a-disability-issue-00076713?nname=the-long_game&nid=00000171-5b34-d92d-a5ff-db3ee8890000&nrid=00000162-06f7-d6f0-ade6-5ef

May 3, 2024

Texas Department of Housing and Community Affairs
Attn: Housing Resource Center
P.O. Box 13941
Austin, Texas 78711-3941
Sent via email to fair.housing@tdhca.texas.gov

Re: Comment on Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice

The Harvey Forgotten Survivors Caucus is a network of Harvey Survivors that have been connected since 2019 who advocate for a just recovery, government transparency and for their homes to be repaired. Most Caucus members are applicants to CDBG-DR funded home repair programs. Each member's success in the program varied, but the majority had many of the same problems throughout the program that present as fair housing issues, and some of those whose construction was complete are living with deficiencies.

The Northeast Action Collective is a community-based organization composed of 100-130 residents of NE Houston who face the consequences of environmental injustice and disasters. The NAC focuses on civil rights, good governance and environmental conditions in our communities. The Caucus and NAC are sister organizations who work closely together and sharing many of the same members. The organizations have collaborated on responses to the COVID 19 pandemic and Winter Storm Uri.

**Our overarching comment to the Texas General Land Office's portion of this AI is that the GLO did not meet any of the criteria of a true analysis of impediments, does not offer any solutions to their impediments, and does not affirmatively further fair housing. HUD should not approve this plan as presented.**

In 2020, the Caucus began to meet with the City's Housing Director Tom McCasland on a regular basis to attempt to understand the barriers the City was facing in administering a program under the GLO when the GLO decided to take over the program. When we learned about this, we began to meet with GLO administrator Heather LaGrone. The Caucus asked for a seat at the table to negotiate the transition and the opportunity to help program administrators understand the barriers with their program. The Caucus was ignored and negotiations were kept between Commissioner George P. Bush and Mayor Sylvester Turner. Attachment A of this comment is the Caucus's comments to the GLO's Draft Amendment 7 of Harvey CDBG-DR funding submitted on June 30, 2020, which included many actions that we suggested by the community for the GLO to take to improve their effort to affirmatively further fair housing. None of which were implemented.

When the GLO took over the program, we were told that no one would be starting from the beginning. We were told everyone would be placed back in the pipeline where they were. We were told the program would not take more than 6 months from start to finish. The GLO took over this program in November of 2020. Over a year later, very few members have even made it to the award obligating phase, which is usually still months from construction beginning. Everyone started at the beginning with intake and documentation. None of the work done by the City was honored. Some continue to deal with eligibility issues stemming from the GLO's faulty program design and endless documentation burden.

NAC has a Title VI complaint with a HUD finding of discrimination against protected classes in the GLO's distribution of CDBG-MIT funding. The continued discrimination and "robbing Peter to pay Paul" appropriation of funding between the CDBG-MIT and CDBG-DR programs for Houston and Harris County does not affirmatively further fair housing.

The members of the Caucus and NAC that have participated in the CDBG-DR funded programs are protected classes including, elderly, people with disabilities, African American and Latino, and some only speak spanish. Each has faced many challenges to get through the program, and some were never allowed to continue in the eligibility process. We think the GLO-administered programs had many impediments to fair housing and the GLO have not taken the necessary steps to truly analyze their impact to BIPOC community, and other protected classes.

HUD should reject the Texas General Land Office's Analysis of Impediments and ask for a substantial improvement to their review and solutions to improve their processes and truly affirmatively further fair housing.

Thank you for your time and consideration in our comments.

Sincerely,

Harvey Forgotten Survivors Caucus

&

Northeast Action Collective

# ATTACHMENT A

June 30, 2020

Texas General Land Office Community Development and Revitalization
P.O. Box 12873
Austin, TX 78711-2873
sent via email to cdr@recovery.texas.gov

RE: Comment on Draft Amendment 7 To Hurricane Harvey State Action Plan

To whom it may concern:

Harvey Forgotten Survivors Caucus (HFSC) is a community-led group focused on improving the City of Houston's Harvey Homeowner Repair Program (HoAP) and promoting the equitable use of federal CDBG-DR funds. Members live in NE and SE Houston.

Many of the members have been through multiple service programs only to be turned down, turned away, or led on. Caucus members have applied to the City of Houston's CDBG-funded home repair program but have not yet received assistance. The fault does not solely lay in the hands of the City of Houston - the entity charged with administering the program for the residents of their community - but also on the Texas General Land Office (GLO) and the United States Department of Housing and Urban Development (HUD) for holding themselves unaccountable and not stepping in and taking action to expedite the assistance.

If the GLO will be taking over the program, the Caucus believes that there are several charges the GLO must agree to and abide by in order to conduct transparent and equitable work that creates meaningful change for residents and the disaster recovery system as a whole.

- *Respect the applicant and their wishes.* Many times government staff has been rude, pushy, with an unwillingness to assist to the full extent, and to the point of placing blame on residents for the status of their situation. This is appalling and must be remedied. Homeowners must be respected and treated with patience and dignity.
- *We believe there should be a Citizen Oversight Board and we are offering to be a part of the Board.*
- *Meaningful outreach is not only important, it is necessary.* We expect the GLO to visit homes and explain to residents the program's rebuilding plans and expectations. We also expect GLO to partner with nonprofit and charitable organizations in the area that already have connections to the most vulnerable populations in the community.
- *We also expect for the staff to take particular care of applicants that are having trouble with the process.* Whether this requires explaining the program in detail, assisting with the collection of documents, or making follow-up calls on a consistent basis. This includes the elderly and differently-abled. This also includes non-english speakers. Every effort should be made to accommodate applicants in this process.

- *We believe applicants should be assigned a direct contact at the GLO.* this person must have enough knowledge about their applicant that can answer questions with the greatest transparency about the process and status of their file.
- *We would like to see pictures of completed houses, floorplans, and significant options at the beginning of the applicant process.*
- *We believe the applicant should be in control of the process as well as the outcome.* We demand that every applicant be given evaluation forms to assess the value of the program as well as the work of the contractors and builders.

It is unfortunate that we have come to this crossroad. However, the Caucus is no longer worried about *who* will do the job but that *the job will be done.* While government agencies squabble about program semantics, residents continue to live in homes that are falling apart before their eyes. Many are living in the conditions PREPS left them - without sheetrock, ceilings, floors, and insulation. Several are doubled up during the pandemic because their home is completely unsalvageable. Repeatedly, we've heard tales of possums and other vermin being caught inside the home. This has never been acceptable, and the Caucus is standing up for all residents that have been left behind in the process.

We are in hurricane season. The residents of Houston were lucky that last year we were only hit by one major storm. However, there is no guarantee that we will be so lucky this year. The work must be done and the Caucus needs for the government to stop arguing about accountability and actually stand accountable to the residents who are still in need three years later after Hurricane Harvey changed their life.


Sincerely,

Harvey Forgotten Survivors Caucus

Texas Department of Housing and Community Affairs

Attn: Housing Resource Center

P.O. Box 13941

Austin, Texas 78711-3941

Email: fair.housing@tdhca.texas.gov

Re: Comment on Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice

To Whom It May Concern:

My name is Shirley Ronquillo and I am a community organizer in Harris County, Houston, TX. I encouraged the Analysis of Impediments to Fair Housing Choice to consider funding for mixed status families, create a different matrix for reevaluating the value of a home to be sold during mandatory buyouts as we are aware communities of color have lower valued homes, and require State entities like the GLO who distributes funds to families to distribute their correspondence in the native language of the applicant.

I worked alongside many residents in the Harris County Mandatory buyout, a program funded by a community development block grant with HUD funding distributed to the Texas General Land Office. Many of the residents were of mixed status households and it was difficult for families to navigate a system not intended for them. The reality of Texas is we do have mixed status families and if they are required to pay taxes, then they should be able to access housing assistance just like anyone else. In particular cases such as the mandatory buyout, families didn't have a choice to not move, however the legal status of the head of households made them ineligible to receive relocation assistance. If the State approves use of eminent domain, then the State should provide relocation assistance to anyone required to move as a result of it.

Furthermore, during the Harris County mandatory buyout program, the GLO determined how much a family would receive for their home based on a skewed analysis of similar homes. The valuation of the home was conducted by a third party vendor. The comparative analysis for homes in Allen Field, for example, utilized homes in African American communities. There are studies that have proven homes in African American communities are undervalued because of the demographics. This left many families unable to purchase homes in the current market and forced them to live in smaller sized lots and acquire debt when the county promised residents they would be in an equal or better situation. There was a more affluent community literally on the other side of the Greens bayou from Allen Field and the homes there were not utilized.

Lastly, State entities like the GLO are charged with distributing funds that can make or a break a families' opportunity to have a roof over their head. Notices of their programs and decisions are released in English only. During the Harris County mandatory buyout, we learned the most important document, the comparative analysis which determined the value of the home to be bought out was only in English. This made it very difficult for families to understand how the

value of the home was determined. It is unlawful for a government entity to force a family to sell their home and it is unlawful for that same government entity to do so without properly notifying the families how much they would receive for their home.
Texas Department of Health and Human Services requires program communications be sent in the language of the applicant so it is possible for a State entity to do the same.

Thank you for the opportunity to submit comments. My hope is that going forward, there is an opportunity to better support our residents through these programs.

Kind regards,
Shirley Ronquillo
Houston, TX

**Daniel & Beshara, P.C.**
**3301 Elm Street**
**Dallas, TX 75226**
**214 939-9230**
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May 3, 2024

Email to: fair.housing@tdhca.texas.gov

Texas Department of Housing and Community Affairs
Attn: Housing Resource Center
P.O. Box 13941
Austin, Texas 78711-3941

Re: Inclusive Communities Project Comment on Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice

To: TDHCA

   This comment on the Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice (2024 Draft AI) is submitted on behalf of the Inclusive Communities Project (ICP). ICP is a fair housing and civil rights organization in Dallas, Texas. ICP helps Dallas-area families with Section 8 Housing Choice Vouchers secure housing opportunities in non-racially concentrated, low poverty, safe neighborhoods with adequate resources. ICP has assisted thousands of federal Housing Choice Voucher holders locate desegregated housing in non-racially concentrated neighborhoods in the Dallas area. The locations of federal Low-Income Housing Tax Credit (LIHTC) housing outside of racially concentrated areas is a critical source of housing for ICP voucher clients. Because TDHCA's LIHTC housing is disproportionately, and significantly located in racially and ethnically concentrated neighborhoods in the major metropolitan areas of Texas, this makes LIHTC housing less available for ICP clients who seek housing in non-racially concentrated locations.

   The 2024 Draft State of Texas AI fails to identify meaningful actions that the State and TDHCA will take to overcome patterns of segregation and foster inclusive communities as required by HUD's affirmatively furthering fair housing (AFFH) rule, 24 C.F.R. § 5.151, in the states' largest federal housing program administered by TDHCA, the federal LIHTC program. The existing 2021 HUD AFFH rule requires TDHCA to affirmatively further fair housing in all of TDHCA's activities and programs relating to housing and urban development. Thus, TDHCA is required to examine the patterns of racial segregation in TDHCA's LIHTC program as part of the 2024 AI. 86 FR 30779-01; 24 C.F.R. § 5.151. TDHCA has failed to identify the existing patterns of racial segregation in the LIHTC housing in the major metropolitan areas and by ignoring these existing extreme patterns of racial segregation, then fails to address actions that can be taken to overcome such existing patterns.

Unlike the assertions in the 2019 Analysis of Impediments, TDHCA's 2024 Draft AI does not state that the State's LIHTC program is not subject to the State's obligation to affirmatively further fair housing. This is because HUD's 2021 AFFH rule clearly requires the State's AFFH obligation to include the LIHTC program. 86 FR 30779-01; 24 C.F.R. § 5.151. In the draft 2024 AI, TDHCA explains the State's LIHTC program but then completely fails to address the existing severe pattern of racial segregation in the LIHTC housing locations. In the 2019 Analysis of Impediments, TDHCA refused to address the LIHTC program because it argued that the AFFH obligation extended only to its programs funded by U.S. Department of Housing and Urban Development funds such as Community Development Block Grant funds (HUD CPD funds). Since HUD CPD funded housing programs do not include the LIHTC housing units, TDHCA's 2019 AI did not comply with its obligation to affirmatively further fair housing with respect to its largest federal housing program, the LIHTC program. 2019 AI, pdf page 484. This failure to analyze and address the segregation in the LIHTC program violates the HUD 2021 AFFH regulation. 86 FR 30779-01; 24 C.F.R. § 5.151. In the draft 2024 AI, TDHCA continues to argue that TDHCA's ability to address the fair housing impediments identified in the Analysis of Impediments is limited to "laying out the ways in which the state agencies with HUD CPD programs will use those resources to address solutions within their control with the CPD funds available." Draft 2024 AI, page 13. This is incorrect. The current 2021 HUD AFFH regulation explains that "the duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development." 86 FR 30779-01; 24 C.F.R. § 5.151. The obligation and remedy of identified impediments is not limited to remedies with only the State's federal HUD CPD funds.

Without taking meaningful actions to address the segregation in the LIHTC program and the policies impacting that segregation, TDHCA's certification with the 2024 AI will not meet the requirements of HUD's 2021 AFFH rule. TDHCA continues to ignore the thousands of LIHTC units that are in racially and ethnically concentrated locations in the major metropolitan areas of the state and continues to violate its obligation to affirmatively further fair housing.

**HUD's 2021 AFFH regulation requires TDHCA to affirmatively further fair housing in the LIHTC program in Texas.**

TDHCA does not assert that the LIHTC program is not covered by HUD's AFFH rule as it did in the 2019 AI. Instead, it is clear the 2021 HUD AFFH regulation requires that "the duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development." 86 FR 30779-01; 24 C.F.R. § 5.151. While HUD does not require an AI or Fair Housing Assessment to be prepared, the 2021 HUD AFFH regulation does require the State (through TDHCA) to certify that since the State receives federal housing funds it is complying with its obligation to affirmatively furthering fair housing in all of its housing and urban development programs. 86 FR 30779-01. This AFFH certification requires the State and TDHCA to take meaningful actions in the administration of the LIHTC program to not only combat discrimination but also to take action that overcome patterns of segregation and foster inclusive communities.

TDHCA's 2024 Draft AI ignores the early commentary by ICP and evidence that the State's LIHTC housing is racially segregated in Texas' major metropolitan areas. Instead, the 2024 Draft AI states that "TDHCA did not analyze awards further back than 2018, as the Department cannot fundamentally alter where LIHTC units have been situated in the past." 2024 Draft AI, page 184. This violates the HUD AFFH rule that requires the State to analyze the patterns of segregation and take steps to overcome historic segregation:

> Affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development. 24 C.F.R. §5.151.

The largest federal housing program administered by TDHCA is the federal LIHTC program. The number of multifamily units produced by TDHCA programs is predominantly driven by the LIHTC program. Of the approximately 334,000 actively TDHCA monitored housing program units in Texas, 280,000 of them are LIHTC program units. 2024 Draft AI, page 184. ICP previously presented TDHCA with evidence of the extremely segregated locations of the LIHTC program in Texas' major metropolitan areas. TDHCA ignored this evidence.

The racial segregation in the Texas LIHTC program is set out in ICP's early comment. See the analysis in that comment at 2024 Draft AI, pdf pages 448-455, 461-474. The 2024 Draft AI does not contest the existence of this racial segregation. Rather it asserts that the applications for 9% LIHTC allocations are for racially diverse geographic locations. 2024 Draft AI, pages 184-186. The Draft does not analyze 4% applications. The 2024 Draft AI does not analyze the pattern of actual allocations by the racial and ethnic demographics for those successful applications. The ICP early comment does analyze the successful allocations, and it shows the perpetuation of racial segregation by the application of TDHCA's policies and practices in the administration of the LIHTC program.

The ICP analysis tracks both the total LIHTC units in each city as well as the units actually allocated from 2016 through 2023. This time frame includes the period for which Texas analyzes the 9% LIHTC applications by demographic characteristics in the 2024 Draft AI. Texas contends that its' analysis shows a non-discriminatory application pool for 9% applications from 2018 through 2022 because the Census tracts where LIHTC applications were submitted were, on average, 38.0% White, non-Hispanic. Texas draws a similar conclusion from the 9% application data for several of the large Texas counties. 2024 Draft AI, page 184-185. The 2024 Draft AI does not analyze the pattern of actual allocations by the racial and ethnic demographics for those successful applications. The claim that the overall 38% White application data from

across the state is useful information for analyzing racial segregation or assessing whether that segregation in the major cities is alleviated is fallacious.

The LIHTC applications are not funded on a statewide basis. The allocations are distributed by regions. The regions are drawn to reflect the differences between these large areas. 2024 Draft AI, pages 42-148. The racial segregation of LIHTC units is evident in Texas' major metropolitan areas. The racial population of the entire state does not provide any information about where the allocated LIHTC units are located and whether those locations show a pattern of racial segregation within which the LIHTC units are located.

The ICP early comment does analyze the successful LIHTC allocations, and it shows the perpetuation of racial segregation by the application of TDHCA's policies and practices in the administration of the LIHTC program. ICP's data is the TDHCA data for both the total LIHTC inventory and the units added to the inventory between 2016 and 2023. The racial segregation measured by the percentage of units in the total inventory compared to the percentage of units added during the period from 2016 to 2023 shows only minor variations in racial segregation. A summary of the changes in Total LIHTC Units distributions shows the persistence of the racial segregation under the annual QAPs and allocation decisions:

Dallas % of Total Units in less than 50% White tracts total 2023 inventory 94.6%.
Dallas % of Total Units in less than 50% White tracts total 2016-2023 93.6%.
Houston % of Total Units in less than 50% White tracts total 2023 inventory 96.2%.
Houston % of Total Units in less than 50% White tracts total 2016-2023 94.4%.
Fort Worth % of Total Units in less than 50% White tracts total 2023 inventory 78.9%.
Fort Worth % of Total Units in less than 50% White tracts total 2016-2023 76.3%.
Austin % of Total Units in less than 50% White tracts total 2023 inventory 86.3%.
Austin % of Total Units in less than 50% White tracts total 2016-2023 86.9%.
San Antonio % of Total Units in less than 50% White tracts total 2023 inventory 99.4%.
San Antonio % of Total Units in less than 50% White tracts total 2016-2023 98.8%. See ICP exhibit data at 2024 Draft AI, pages 448-449, 461-474.[1]

For this comment, ICP has also analyzed the average percent White non-Hispanic for the Dallas and Houston census tracts in which LIHTC units are located. In Dallas, the average percent White non-Hispanic or Latino population of the census tracts with LIHTC properties is 14.2%. In Houston, the percentage is 14%. In Dallas, the average percent White non-Hispanic or Latino population of the census tracts with 4% LIHTC properties is 8.7%. In Houston the percentage is 12.5%. This data provides further evidence that the locations of existing LIHTC projects in the major cities in Texas are located in racially and ethnically concentrated tracts.

The evidence shows a pattern of racial segregation in the distribution of Texas LIHTC units that is not addressed in the 2024 Draft AI.

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[1] These ICP exhibits are also attached to this comment.

**The 2024 Draft AI uses a biased dissimilarity index that fails to measure segregation as defined by the AFFH rule.**

The 2024 Draft AI definitively omits elements required by HUD in 24 C.F.R. § 5.151, et seq in relation to the LIHTC program. The existing HUD AFFH rule requires Texas to affirmatively further fair housing for all of its programs and activities relating to housing. 24 C.F.R. § 5.151. The existing HUD AFFH rule has specific definitions for integration and segregation that give meaning to the State's required AFFH actions.

> **Integration means a condition**, within the program participant's geographic area of analysis, **in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.** For individuals with disabilities, integration also means that such individuals are able to access housing and services in the most integrated setting appropriate to the individual's needs….

> **Segregation means a condition**, within the program participant's geographic area of analysis, **in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.** For persons with disabilities, segregation includes a condition in which the housing or services are not in the most integrated setting appropriate to an individual's needs in accordance with the requirements of the Americans with Disabilities Act (42 U.S.C. 12101, et seq.), and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794). (See 28 CFR part 35, appendix B (2010), addressing 25 CFR 35.130.) (emphasis added). 24 C.F.R. § 5.151.

The word "segregation" does not appear in the TDHCA 2024 Draft AI until page 221 where it is stated in the quoted HUD definition of Affirmatively Further Fair Housing. "Segregation" appears again on page 265 in the description of Texas' new index of dissimilarity that deliberately flaunts the definition of segregation in the HUD rule. "Segregation" by Texas' standard is not the segregation in the HUD rule. The HUD rule follows accepted usage and defines segregation by comparing a high concentration of persons of a particular classification in a small area when comparted to the characteristics of a relevant and larger geographic area.[2] Texas chose to define its diversity index based solely on the characteristics of the single area for which the index is calculated without regard to any larger area. Under the State's definition, the closer the Index is to 1, the higher the diversity. 2024 Draft AI, pages 265-267.

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[2] HUD uses a non-White non-Hispanic or Latino population of 50% or more as a guide on determining the existence of a racially concentrated area. https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_9/about. The 2024 Draft AI uses this HUD definition for a racially/ethnically concentrated area must have a non-white population of 50% or more of the tract's total population. 2024 Draft AI, page 21.

Thus, in Texas, if the area population is "25% Hispanic and 75% White," the Diversity Index is .75 and the area is considered much more diverse than a 50% Hispanic and 50% White area with a Texas Diversity Index of .50. 2024 Draft AI, pages 265-267. Texas' Index reaches an even more startling result in the following example of an area in which:

> 40% of the population is Some Other Race;
> 60% is White;
> 25% are Hispanic; and
> 75% are Non-Hispanic. 2024 Draft AI, page 266.

In this hypothetical area, Texas' Diversity Index is .847. Yet, by Texas' own example, the area is at least 25% Hispanic and overall, the area is 65% some other race than White non-Hispanic (40% = Some Other Race + 25% Hispanic).

The bias of the Texas Diversity Index is shown by census tract examples. Texas states the Texas Diversity Index for Census tract 166.34 in Dallas is .57, higher than a 50%/50% tract. This tract is not diverse but is ethnically concentrated as defined by HUD's definition of racial and ethnic concentration. Tract 166.34 is 3.6% White not Hispanic or Latino, 76% Hispanic or Latino and 16.7% Black or African American. U.S. Census American Community Survey 5yr data 2018-2022.

Another example is 2024 Draft AI statement that the Texas Diversity Index for Dallas Census tract 205 is .41, making it appear integrated. (Data available at 2024 Draft AI Figure 2-2, page 22). The U.S. Census American Community Survey 5yr data 2018-2022 for the tract shows it is 3.3% White Not Hispanic or Latino, 47% Black or African American and 39.2% Hispanic. This is a racially and ethnically concentrated location and is not racially or ethnically diverse.

The 2024 Draft AI does not discuss racial integration or specify any LIHTC related actions to bring about racial integration in which there is not a high concentration of persons of a particular race, color, national origin when compared to a broader geographic area. The 2024 Draft AI clearly understands the concept of integration in the context of persons with disabilities. 2024 Draft AI, pages 179-180. However, the 2024 Draft AI fails to address racial or national origin integration.

**The 2024 Draft AI fails to examine the inequitable environmental conditions that disproportionately impact LIHTC residents in racially and ethnically concentrated locations.**

TDHCA uses an arbitrary distance factor to allow LIHTC projects within 300 feet of junkyards, solid waste facilities, sanitary landfills, illegal dumping sites or within 500 feet of active railroad tracks, heavy industry (i.e. facilities that require extensive use of land and machinery, produce high levels of external noise such as manufacturing plants, or maintains fuel storage facilities) 10 TAC 11.101(a)(2). But it also includes as unacceptable sites with exposure "to an environmental factor that may adversely affect the health and safety of the residents or render the Site inappropriate for housing use and which cannot be adequately mitigated." 11 TAC 11,101(a)(2)(K). This factor is left undefined and subject to arbitrary and capricious

enforcement discretion. ICP proposed the use of the Agency for Toxic Substances and Disease Registry and the Center for Disease Control Environmental Justice Index (EJI) to fill this gap. Texas has rejected this proposal quoting the Agencies' admitted limitations on the use of the Index.

ICP supported its proposal with an analysis of four EJI elements: 1) Proportion of tract area within 1 mile buffer of EPA National Priority (Superfund) sites; 2) Potentially Hazardous & Toxic sites from the Toxic Release Inventory (TRI) sites and proportion of tract within 1 mile buffer of TRI; 3) Proportion of tract area within 1 mile buffer of EPA Treatment, Storage, and Disposal Facilities 4) Proportion of tract area within 1 mile buffer of EPA Risk Management Plan sites. See ICP Early Comment, pages 9-11, at 2024 Draft AI, pdf pages 452-454.

The number of total units in LIHTC projects within the buffer zone for each of these adverse industrial uses, the number of total units within the buffer zone in census tracts where the national ranking shows that the impacts from the element exceed the impacts found in 75% of all census tracts in the nation and the racial distribution of these units is set out in the table summarizing the EJI data in ICP Exhibit 3.

ICP Exhibit 3 demonstrates both the presence of the adverse uses in the buffer zone and the high impact national percentile rankings in the five cities. The Dallas data shows 94.8% of the 20,983 LIHTC units located in census tracts within the buffer zone of industries subject to the Toxic Release Inventory are in minority census tracts. In addition, 96.7% of the 9,424 units located in those census tracts with the high impact national percentile ranking of .75 or higher are in minority census tracts. Four of the eight data elements show that 100% of the units in LIHTC projects affected are in minority census tracts San Antonio also has four of the eight data elements where 100% of the units in LIHTC projects affected are in minority census tracts. See ICP Exhibit 3 table.

In its rejection of the proposed use of the EJI, Texas missed the ATSDR/CDC message on how the EJI should be used. The ATSDR/CDC Agencies show that the EJI can be used for a variety of important inquiries. The EJI identifies and prioritizes areas that may require special attention or additional action to improve health and health equity, educate and inform the public about their community, analyze the unique, local factors driving cumulative impacts on health to inform policy and decision-making, and establish meaningful goals and measure progress towards environmental justice and health equity. The scores for several neighborhoods can be compared to determine those that need additional resources to address environmental burden or social determinants of health. https://www.atsdr.cdc.gov/placeandhealth/eji/faq_eji.html. These uses fit the objective in TDHCA's undesirable site factor catch all provision. Determining whether proposed sites are exposed "to an environmental factor that may adversely affect the health and safety of the residents or render the Site inappropriate for housing use" and whether that environmental fact can be adequately mitigated is an appropriate use of the EJI by TDHCA for assessing proposed sites. 11 TAC 11,101(a)(2)(K). Not only is this a good policy to protect the families living in the TDHCA funded LIHTC projects, but it is also part of affirmatively furthering fair housing. 88 FR 8516, 8521 (2/9/2023).

**The 2024 Draft AI deliberately omits meaningful actions to address racial segregation in its largest housing program, the Low-Income Housing Tax Credit program, in violation of its AFFH obligation.**

HUD holds that the duty to affirmatively further fair housing "extends to all of a program participant's activities and programs relating to housing and urban development." 24 C.F.R. § 5.151. As discussed, the LIHTC program is Texas' largest housing program, and the 2024 Draft AI omits from its affirmatively further fair housing analysis. 2024 Draft AI, page 184.

The 2024 Draft AI does not discuss or specify any LIHTC related actions to "overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics" by "taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity." 24 C.F.R. § 5.151.

The federal agency that administers the LIHTC program also requires compliance with the obligation to affirmatively further fair housing. The Internal Revenue Service Revenue Ruling specifically referred to the HUD 2015 Affirmatively Furthering Fair Housing Rule in its holding that allowing the municipal veto was not in compliance with that obligation whether or not the practice violated other sections of the Fair Housing Act. The Revenue Ruling sets out the Affirmatively Furthering Fair Housing obligation as clearing applying to the LIHTC housing program:

> In the summer of 2015, the United States Department of Housing and Urban Development (HUD) issued new final regulations regarding obligations under the Act to Affirmatively Further Fair Housing (AFFH). See 80 Fed. Reg. 42272 (2015) (issuing HUD's AFFH final rule, which is codified at various locations in 24 CFR Parts 5, 91, 92, 570, 574, 576, and 903). Discussing the many decades during which AFFH had been firmly established Federal policy, HUD states in the preamble, "From its inception [in 1968], the [[[Act] ... has not only prohibited discrimination in housing related activities and transactions but has also provided, through the duty to affirmatively further fair housing ..., for meaningful actions to be taken to overcome the legacy of segregation, unequal treatment, and historic lack of access to opportunity in housing." Id. at 42272 (emphasis added). AFFH was firmly established Federal housing policy when § 42 was enacted, and there is no suggestion that Congress intended § 42 to diverge from that policy. Section 42(m)(1)(A)(ii), therefore, does not require or even encourage conduct inconsistent with that policy. Rev. Rul. 2016-29 (IRS RRU), 2016-52 I.R.B. 875, 2016 WL 7217878 Internal Revenue Service (I.R.S.). Blaine G. Saito, Collaborative Governance and the Low-Income Housing Tax Credit, 39 Va. Tax Rev. 451, 475 (2020) (IRS banned this practice).

Instead of complying with the AFFH obligation, Texas endorses, allows, and continues to support similar practices to prevent the pro-integrative location for the development of LIHTC projects. The 2024 Draft AI specifically agrees that there are various ways in which the municipal veto can be exercised to prevent LIHTC units in what Texas refers to as opportunity areas. 2024 Draft AI, pages 247-248. The 2024 Draft AI offers no actions to address this open and overt barrier to racial segregation and integration.

The failure to propose any meaningful action to overcome patterns of racial segregation in the LIHTC program differs from the 2024 Draft AI recommendations for TDHCA administered HUD CPD funded housing. On page 153 the 2024 Draft AI specifically refers to TDHCA conducting site and neighborhood reviews for the proposed sites of federally funded HOME, HOME-ARP, and NHTF multifamily applications. The reviews explicitly include whether the sites were "in areas that had greater minority concentration than that of the larger surrounding market area." If so, these HUD funded applications would have been denied absent a showing that the location in a racially segregated area was justified by an overriding need for housing. 2024 Draft AI, page 153. By contrast, TDHCA does not examine the locations of LIHTC housing without HUD HOME funding in areas of racial or ethnic concentration, and instead, states that it only makes "small, but important changes to the Qualified Allocation Plan from year to year in order to drive affordable housing to high opportunity areas and to keep its Low-Income Housing Tax Credit awards from concentrating affordable housing in primarily low-income neighborhoods." 2024 Draft AI, page 153. The difference in funding for the HUD CPD housing and the LIHTC housing does not justify the failure to examine the locations of the LIHTC housing and to take steps to overcome historic patterns of segregation in the LIHTC housing sites. By focusing on remaining "responsive to stakeholder concerns and needs" in the LIHTC Qualified Allocation Plan and not examining the locations of the LIHTC housing to see if the QAP is perpetuating existing LIHTC segregation, TDHCA is violating its obligation to affirmatively further fair housing.

**The evidence supports the need for TDHCA to comply with its obligation to affirmatively further fair housing and take meaningful actions to overcome segregation for the LIHTC program.**

National experts are urging the states to comply with the affirmatively furthering fair housing obligation in the administration of the LIHTC allocation process. See the following example based on national data.

> The prior research indicates that the LIHTC program is failing to serve as a mechanism to either deconcentrate poverty or to affirmatively further fair housing. Regardless of the results of pending litigation, the Inclusive Communities case and the new AFFH rule, as well as the legal activity surrounding it, suggest that officials at state and local levels are entering a new era that will test their capacity to implement. the LIHTC program with greater effectiveness. Such officials, working in concert with planners, would be wise to ensure that the locations of LIHTC developments demonstrate that low-income.

households served by the development are offered housing in high opportunity neighborhoods offering racially and economically integrated environments with access to good schools and gainful employment. Kirk McClure, Anne R. Williamson, Hye-Sung Han & Brandon Weiss, The LIHTC Program, Racially/Ethnically Concentrated Areas of Poverty, and High-Opportunity Neighborhoods, 6 Tex. A&M J. Prop. L. 89, 98 (2020). Available at: https://doi.org/10.37419/JPL.V6.12.1.

The Internal Revenue Service has given notice that the affirmatively further housing obligation must be followed in the implementation of the LIHTC program. Id., Rev. Rul. 2016-29.

Texas' municipalities have given notice that the State's operation of the LIHTC program is causing racial segregation within their boundaries. The City of Dallas points out that as of 2019 the average percent White non-Hispanic or Latino population of the tracts with LIHTC projects was only 17%. Analysis of Impediments to Fair Housing Choice City of Dallas, Texas July 2019, page 94. The City of Fort Worth points to the concentrations of LIHTC projects in "concentrated areas based on race-ethnicity and lower income persons and exhibit advanced signs of disinvestment and poor housing and living conditions." Fort Worth urges the adoption of "LIHTC Funding Criteria to include a Location Criteria Policy that incentivizes developers' applications that do not choose poverty and racial/ethnic concentrated census tracts to help reduce concentrated poverty, race, and ethnicity." Analysis of Impediments to Fair Housing Choice City of Fort Worth, Texas, 2023, pages 112-113.

Texas should revise its Analysis of Impediments to comply with the law and take meaningful actions to address the racially and ethnically segregated locations of the State's LIHTC program. 24 C.F.R. § 5.151.

Michael Daniel and Laura Beshara represent ICP for this comment. If you have further questions about this comment, please let us know.

Sincerely,

Laura B. Beshara
Michael M. Daniel
Daniel & Beshara, P.C.
Attorneys for Inclusive Communities Project

cc w/ exhibits:
Ann Lott, President of Inclusive Communities Project

# City of Dallas 2023 HTC Inventory

| City of Dallas | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 154 | | | 24,792 | 23,147 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 145 | | | 23,454 | 22,040 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 94.2% | | | 94.6% | 95.2% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 9 | | | 1,338 | 1,107 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 5.8% | | | 5.4% | 4.8% |

Exhibit 1

# City of Dallas 2023 HTC Inventory
## analysis of allocations from 2016 to present

| City of Dallas 2016 to 2023 LIHTC allocations | LIHTC projects | | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 80 | | | | 14,417 | 13,107 |
| Total in tracts with less than 50% White not Hispanic or Latino | 75 | | | | 13,493 | 12,386 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 93.8% | | | | 93.6% | 94.5% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 5 | | | | 924 | 721 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 6.3% | | | | 6.4% | 5.5% |

Exhibit 1

City of Houston 2023 HTC Inventory

| City of Houston | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 307 | | | 47,152 | 44,447 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 288 | | | 45,348 | 42,847 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 93.8% | | | 96.2% | 96.4% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 19 | | | 1,804 | 1,600 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 6.2% | | | 3.8% | 3.6% |

Exhibit 1

City of Houston 2023 HTC Inventory
analysis of allocations from 2016 to present

| City of Houston 2016 to 2023 LIHTC allocations | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 155 | | | 23,254 | 21,740 |
| Total in tracts with less than 50% White not Hispanic or Latino | 140 | | | 21,942 | 20,625 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 90.3% | | | 94.4% | 94.9% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 15 | | | 1,312 | 1,115 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 9.7% | | | 5.6% | 5.1% |

Exhibit 1

City of San Antonio 2023 HTC Inventory

| City of San Antonio | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA Inventory | 179 | | | 30,722 | 28,900 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 178 | | | 30,523 | 28,701 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 99.4% | | | 99.4% | 99.3% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 1 | | | 199 | 199 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 0.6% | | | 0.6% | 0.7% |

Exhibit 1

## City of San Antonio 2023 HTC Inventory
## 2016 to current

| City of San Antonio 2016 to current | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 93 | | | 17,163 | 16,632 |
| Total in tracts with less than 50% White not Hispanic or Latino | 92 | | | 16,964 | 16,433 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 98.9% | | | 98.8% | 98.8% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 1 | | | 199 | 199 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 1.1% | | | 1.2% | 1.2% |

Exhibit 1

# City of Austin 2023 HTC Inventory

| City of Austin | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 183 | | | 30,435 | 29,622 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 150 | | | 26,256 | 25,576 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 82.0% | | | 86.3% | 86.3% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 33 | | | 4,179 | 4,046 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 18.0% | | | 13.7% | 13.7% |

Exhibit 1

City of Austin 2023 HTC Inventory
2016 to current

| City of Austin 2016 to 2023 LIHTC allocations | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 118 | | | 19,259 | 18,801 |
| Total in tracts with less than 50% White not Hispanic or Latino | 97 | | | 16,735 | 16,329 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 82.2% | | | 86.9% | 86.9% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 21 | | | 2,524 | 2,472 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 17.8% | | | 13.1% | 13.1% |

Exhibit 1

City of Fort Worth 2023 HTC Inventory

| City of Fort Worth | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| All in City w/ census tract ID in TDHCA HTC Inventory | 114 | | | 17,543 | 16,524 |
| Total in tracts with less than 50% White Not Hispanic or Latino | 89 | | | 13,840 | 13,137 |
| Percent of All in tracts with less than 50% White Not Hispanic or Latino | 78.1% | | | 78.9% | 79.5% |
| Total in tracts with greater than or equal to 50% White Not Hispanic or Latino | 25 | | | 3,703 | 3,387 |
| Percent of All in tracts with greater than or equal to 50% White Not Hispanic or Latino | 21.9% | | | 21.1% | 20.5% |

Exhibit 1

City of Fort Worth 2023 HTC Inventory
2016 to current

| City of Fort Worth 2016 to 2023 LIHTC allocations | LIHTC projects | | | Total Units in LIHTC projects | Total "LIHTC" Units in LIHTC projects |
|---|---|---|---|---|---|
| Total | 60 | | | 9,138 | 9,138 |
| All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October 30, 2023 | 57 | | | 9,058 | 8,341 |
| Total in tracts with less than 50% White not Hispanic or Latino | 44 | | | 6,915 | 6,432 |
| Percent of All in tracts with less than 50% White not Hispanic or Latino | 77.2% | | | 76.3% | 77.1% |
| Total in tracts with greater than or equal to 50% White not Hispanic or Latino | 14 | | | 2,143 | 1,909 |
| Percent of All in tracts with greater than or equal to 50% White not Hispanic or Latino | 24.6% | | | 23.7% | 22.9% |

Exhibit 1

Comparison of units in LIHTC applications receiving LIHTC allocations between White and Minority locations for Dallas and surrounding counties -                                2009 - 2017

Comparison of percent
of units allocated LIHTC
in Majority White non-
Hispanic tracts to
percent of units
allocated LIHTC in
Minority tracts, 2009 -
2017

| Year | Percent of Applications for Units in Majority White Areas, LIHTC allocated | Percent of Applications for Units in Minority Areas, LIHTC allocated | Allocation Rate for Majority White Areas as Percent of allocation rate for Minority Areas |
|---|---|---|---|
| 2009 | 20.1% | 24.7% | 81.4% |
| 2010 | 18.0% | 18.9% | 95.4% |
| 2011 | 27.9% | 56.7% | 49.3% |
| 2012 | 6.6% | 19.0% | 34.8% |
| 2013 | 27.5% | 30.6% | 89.8% |
| 2014 | 31.4% | 54.0% | 58.2% |
| 2015 | 8.6% | 54.9% | 15.6% |
| 2016 | 15.9% | 43.8% | 36.4% |
| 2017 | 11.1% | 26.3% | 42.1% |

| | | | |
|---|---|---|---|
| All Applications 2009 to 2017 | 17.1% | 35.5% | 48.1% |
| All Applications 2009 to 2013 | 18.6% | 28.3% | 65.7% |
| All Applications 2014 to 2017 | 16.2% | 44.1% | 36.6% |

Exhibit 2
TDHCA LIHTC 4 Percent and 9 Percent Combined Applications Awarded and Not Awarded for 7 County Area

Exhibit 3 CDC/ATSDR Enviromental Justice Index Industrial Related Factors

## CDC/ATSDR EJI Index industrial related factor*

## Units in TDHCA LIHTC projects affected by the CDC/ATSDR EJI industrial related element

| City | # of LIHTC units in tracts containing area within 1 mi buffer of NPL site | # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of Toxic Release Inventory (TRI) sites | # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites for the Treatment, Storage, and Disposal of hazardous wastes | # of LIHTC projects in tracts with exposure to T, S, D hazardous waste sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites subject to Risk Management Plans | # of units in LIHTC projects in tracts with exposure to sites subject to Risk Management Plans that is greater than the national percentile rank of .75. ** |
|---|---|---|---|---|---|---|---|---|
| **EJI Factor:** Proportion of tract area within 1-mi buffer of EPA National Priority List (NPL) sites | **EJI Factor:** Percentile rank ofproportion of tract's area within 1-mi buffer of EPA National Priority List site | **EJI Factor:** Proportion of tract area within 1-mi buffer of Toxic Release Inventory (TRI) sites | **EJI Factor:** Percentile rank of proportion of tract's area within 1-mi buffer of EPA Toxic Release Inventory site | **EJI Factor:** Proportion of tract area within 1-mi buffer of EPA Treatment, Storage, and Disposal Facilities (TSDF) | **EJI Factor:** Percentile rank of proportion of tract'sarea within 1-mi buffer of EPA Treatment, Storage,and Disposal site | **EJI Factor:** Proportion of tract area within 1-mi buffer of EPA Risk Management Plan (RMP) sites | **EJI Factor:** Percentile rank ofproportion of tract'sarea within 1-mi buffer of EPA risk management plan site | |
| **Houston** | 6171 | 6171 | 39595 | 23257 | 5852 | 5852 | 26444 | 21127 |
| White tracts | 351 | 351 | 1499 | 514 | 0 | 0 | 839 | 465 |
| Minority tracts | 5820 | 5820 | 38096 | 22743 | 5852 | 5852 | 25605 | 20662 |
| % in Minority tracts | 94.3% | 94.3% | 96.2% | 97.8% | 100.0% | 100.0% | 96.8% | 97.8% |
| **San Antonio** | 1792 | 1792 | 25091 | 8641 | 4842 | 4842 | 14868 | 11897 |
| White tracts | 0 | 0 | 303 | 94 | 0 | 0 | 358 | 358 |
| Minority tracts | 1792 | 1792 | 24788 | 8547 | 4842 | 4842 | 14510 | 11539 |
| % in Minority tracts | 100.0% | 100.0% | 98.8% | 98.9% | 100.0% | 100.0% | 97.6% | 97.0% |
| **Austin** | 0 | 0 | 23946 | 9749 | 0 | 0 | 16388 | 13679 |
| White tracts | 0 | 0 | 1696 | 325 | 0 | 0 | 1082 | 1012 |
| Minority tracts | 0 | 0 | 22250 | 9424 | 0 | 0 | 15306 | 12667 |
| % in Minority tracts | 0 | 0 | 92.9% | 96.7% | 0.0% | 0.0% | 93.4% | 92.6% |
| **Dallas** | 2748 | 2748 | 20983 | 11558 | 2796 | 2796 | 14735 | 12009 |
| White tracts | 0 | 0 | 1194 | 952 | 0 | 0 | 417 | 107 |
| Minority tracts | 2748 | 2748 | 19789 | 10606 | 2796 | 2796 | 14318 | 11902 |
| % in Minority tracts | 100.0% | 100.0% | 94.3% | 91.8% | 100.0% | 100.0% | 97.2% | 99.1% |

Exhibit 3

Exhibit 3 CDC/ATSDR Enviromental Justice Index Industrial Related Factors

## CDC/ATSDR EJI Index industrial related factor*

| EJI Factor: Proportion of tract area within 1-mi buffer of EPA National Priority List (NPL) sites | EJI Factor: Percentile rank ofproportion of tract's area within 1-mi buffer of EPA National Priority List site | EJI Factor: Proportion of tract area within 1-mi buffer of Toxic Release Inventory (TRI) sites | EJI Factor: Percentile rank of proportion of tract's area within 1-mi buffer of EPA Toxic Release Inventory site | EJI Factor: Proportion of tract area within 1-mi buffer of EPA Treatment, Storage, and Disposal Facilities (TSDF) | EJI Factor: Percentile rank of proportion of tract'sarea within 1-mi buffer of EPA Treatment, Storage,and Disposal site | EJI Factor: Proportion of tract area within 1-mi buffer of EPA Risk Management Plan (RMP) sites | EJI Factor: Percentile rank ofproportion of tract'sarea within 1-mi buffer of EPA risk management plan site |
|---|---|---|---|---|---|---|---|

## Units in TDHCA LIHTC projects affected by the CDC/ATSDR EJI industrial related element

| City | # of LIHTC units in tracts containing area within 1 mi buffer of NPL site | # of LIHTC units in tracts with exsposure to NPL sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of Toxic Release Inventory (TRI) sites | # of LIHTC units in tracts with exsposure to NPL sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites for the Treatment, Storage, and Disposal of hazardous wastes | # of units in LIHTC projects in tracts with exposure to T, S, D hazardous waste sites that is greater than the national percentile rank of .75. ** | # of units in LIHTC projects in tract containing area within 1-mi buffer of sites subject to Risk Management Plans | # of units in LIHTC projects in tracts with exposure to sites subject to Risk Management Plans that is greater than the national percentile rank of .75. ** |
|---|---|---|---|---|---|---|---|---|
| Fort Worth | 1173 | 1173 | 13621 | 5632 | 451 | 451 | 8159 | 6072 |
| White tracts | 88 | 88 | 3404 | 611 | 0 | 0 | 2278 | 1239 |
| Minority tracts | 1085 | 1085 | 10217 | 5021 | 451 | 451 | 5881 | 4833 |
| % in Minority tracts | 92.5% | 92.5% | 75.0% | 89.2% | 100.0% | 100.0% | 72.1% | 79.6% |

* The CDC/ATSDR EJI Index data and documentation was compiled and is maintained by the Center For Disease Control (CDC) and its (ATSDR). Agency for Toxic Substances and Disease Registry (ATSDR). This data is available at https://www.atsdr.cdc.gov/placeandhealth/eji/index.html.

** The higher the percentile rank, the higher the relative adverse impacts from the environmental factor compared to all other tracts in the nation. A percentile ranking represents the proportion of tracts (or counties) that are equal to or lower than a tract of interest in environmental burden. For example, a EJI ranking of 0.85 signifies that 85% of tracts in the nation likely experience less severe cumulative impacts from environmental burden than the tract of interest,and that 15% of tracts in the nation likely experience more severe cumulative impacts from environmental burden.

*** The number of units in this exhibit 3 is varies somewhat from the units in Exhibit 1. This Exhibit was prepared using the TDHCA HTC Inventory creasted on 3/25/2023. Exhibit 1 was prepared using the TDHCA October 30, 2023 HTC Inventory.

Exhibit 3

May 3, 2024

Texas Department of Housing and Community Affairs
Attn: Housing Resource Center
P.O. Box 13941
Austin, Texas 78711-3941

    ***Sent Via Email to***: fair.housing@tdhca.texas.gov

To Whom It May Concern,

    The NAACP Legal Defense and Educational Fund (LDF) submits this comment to the Texas Department of Housing and Community Affairs (TDHCA) on the Draft 2024 Analysis of Impediments to Fair Housing Choice (AI), which will guide the state's affordable housing strategy. Black Texans still face significant barriers to fair housing choice including discriminatory screening practices, residential segregation, and lack of affordable options in high opportunity neighborhoods. We support TDHCA's decision to expand the scope of the 2024 Draft AI beyond HUD Community Planning Development (CPD) programs to include recommendations to improve fair housing issues at Low-Income Housing Tax Credit (LIHTC) properties. Nevertheless, the 2024 Draft AI does not fulfill TDHCA's obligation to affirmatively further fair housing (AFFH). TDHCA relies too heavily on education and outreach as actions to address impediments, which are unlikely to result in a material positive change to the barriers Black and other households of color experience. TDHCA and the State of Texas must use the AI process to commit to meaningful, measurable action to eliminate impediments. This includes limiting housing segregation in LIHTC units, barring criminal history screening and other discriminatory screening practices, and supporting eviction prevention measures aimed at keeping marginalized communities in their homes.

    Founded in 1940 by Thurgood Marshall, LDF is the nation's oldest civil rights law organization. LDF was launched at a time when America's aspirations for equality and due process of law were stifled by widespread state-sponsored racial inequality. For more than 80 years, LDF has relied on the Constitution and federal and state civil rights laws to pursue equality and justice for Black Americans and other people of color. LDF's mission has always been transformative: to achieve racial justice, equality, and an inclusive society. Since its inception, LDF has worked to increase fair housing opportunities for Black Americans. Some of LDF's early victories in the Supreme Court came in *Shelley v. Kramer*, 334 U.S. 1 (1948), and *McGhee v. Sipes*, 334 U.S. 1 (1948), which held that the state enforcement of racially-restrictive covenants violated the Equal Protection Clause. In the decades since those victories, LDF has continued to challenge public and private policies and practices that deny Black people safe and quality housing and free from discrimination.

    Black Texans face a number of obstacles that prevent them from accessing stable housing in high-opportunity neighborhoods. In Texas, 55% of Black renter households are cost burdened,

compared to 43% of white renter households.[1] More than 70% of Black and Latinx women earn wages that fall short of the one-bedroom housing wage.[2] Due to the lack of affordable housing options as well as ongoing discriminatory practices, Black Texans disproportionately remain in racially-segregated neighborhoods, including when living in LIHTC housing, which is the primary source of new and existing affordable housing units in the state.[3]  Research from the Inclusive Communities Project (ICP) showed that the LIHTC projects in metropolitan areas are overwhelmingly located in racially and ethnically concentrated neighborhoods. In Dallas, from 2016-2023, 93.6% of the total LIHTC units were in less than 50% white census tracts; in San Antonio, 98.8% of the total LIHTC units were in less than 50% white census tracts.[4] These developments are also frequently in poor condition and expose residents to environmental hazards.[5]

In addition to these barriers, Black Texans and other residents of color face a number of other fair housing impediments. In its 2024 Draft AI, TDHCA found that Black Texans face obstacles in accessing homeownership and lending products.[6] The agency pointed out that Black applicants were denied home loans at higher rates than their white and Asian counterparts, even when controlling for income.[7]  Finally, as TDHCA pointed out, "A significant portion of individuals with criminal records are members of one or more protected classes…. criminal history that limits access to housing further compounds the challenges of reentry and may reduce success rates and increase recidivism."[8]

The 2024 Draft AI outlines how Texas plans to meet its AFFH obligations, which federal law imposes on all U.S. Department of Housing and Urban Development (HUD) grantees. Under current federal regulations, the duty to AFFH extends to all program participant's activities and programs relating to housing and urban development.[9] The regulation requires program participants like TDHCA to identify meaningful actions that will eliminate impediments to fair housing, and take significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing.[10] As such, TDHCA has an obligation under current AFFH regulations to take long-overdue actions to undo intentionally harmful and discriminatory housing policies.

We urge TDHCA to revise the 2024 Draft AI in order to address segregation and conditions in LIHTC developments, limit criminal history exclusions, and implement eviction prevention

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[1] LISA ALBRACHT, TEXAS HOMELESS NETWORK, THE STATE OF HOUSING AFFORDABILITY IN TEXAS: OUT OF REACH (2022), https://www.thn.org/2023/02/09/oor-22/
[2] *Id.*
[3] TEXAS DEP'T OF HOUS. & COMMUNITY AFFAIRS, DRAFT 2024 STATE OF TEXAS ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE 449 (April 2024), https://www.tdhca.texas.gov/sites/default/files/fair-housing/docs/24-Tx-AI-Draft.pdf (2024 Draft AI).
[4] *Id.*
[5] Id.
[6] *Id.*
[7] *Id.*
[8] *Id.*
[9] 24 C.F.R. § 5.151
[10] *Id.*

measures. TDHCA must develop meaningful measures to address these impediments, which impair Black Texans' housing choices.


**LIHTC**

The Texas LIHTC program is the largest affordable rental housing program in Texas and the United States.[11] Although the LIHTC program in Texas has produced several thousand units of housing for low-income families, as noted above, LIHTC projects in metropolitan areas in Texas are disproportionately and overwhelmingly located in Black and Latinx neighborhoods. TDHCA's own study of LIHTC properties from 2018-2022 showed that LIHTC applications in metropolitan areas like Tarrant and Collin County are disproportionately for buildings in tracts with significantly higher poverty rates and are significantly fewer white, non-Latinx residents.[12] The placement of these projects in racially-concentrated, low-opportunity neighborhoods reinforces residential segregation and severely limits fair housing choice for affordable housing tenants, who are disproportionately people of color.

In the 2024 Draft AI, TDHCA failed to adequately address how it would use its authority to address the fair housing impediments caused by the LIHTC program. For example, LIHTC developers can choose between two tax credit options: the non-competitive LIHTC program, which offers a 4% tax credits for rehabilitation projects or new construction with additional subsidies, and the competitive program, which offers a 9% tax credit to new developments. Unfortunately, developers disproportionately use the 4% tax credits for projects in high-poverty neighborhoods, exacerbating, rather than dismantling, residential segregation. As TDHCA staff wrote in the 2024 Draft AI, "The gap in poverty rates between tracts that have and tracts that do not have applications is higher in the 4% non-competitive program than compared to the 9% competitive program." Yet TDHCA does not offer any solutions to help get 4% projects in higher-opportunity census tracts. TDHCA should take steps to increase construction of 4% projects in high-opportunity neighborhoods, including removing the exemption for 4% projects from the census tract poverty rate neighborhood risk factor index in their Qualified Allocation Plan, which would ensure that 4% projects would not be located within a census tract that has a poverty rate above 40% (or 55% for Developments in regions 11 and 13).

The current 2024 Draft AI also does not adequately address how the LIHTC program funds developments that expose low-income tenants to poor housing conditions and environmental hazards. As the Inclusive Communities Project highlighted in their comment on the 2024 Draft AI, LIHTC projects that are located in Black and Latinx neighborhoods are disproportionately exposed to environmental harms, industrial emissions and risks to health and safety.[13] For example, chemical plants and oil refineries in the greater Houston area are overwhelmingly located close to or within communities of color. As a result, Black children in Houston are more than twice

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[11] Lauren Looney & Heather Way, *The Low-Income Housing Tax Credit Program in Texas: Opportunities for State and Local Preservation Strategies*, UNIV. OF TEXAS SCH. OF LAW: ENTREPRENEURSHIP & COMMUNITY DEV. CLINIC, (Dec. 2018), https://law.utexas.edu/wp-content/uploads/sites/11/2019/06/2018-ECDC-LIH-TaxCreditProg-TX.pdf
[12] 2024 Draft AI, *supra*, note 3.
[13] 2024 Draft AI, *supra*, note 3.

as likely to develop asthma than white children.[14] Yet TDHCA made no mention of improving the conditions or environmental hazards around LITHC properties in either the impediment section or in the recommendation section.

In its 2024 Draft AI, TDHCA must examine the policies and practices that push a disproportionate number of LIHTC projects into neighborhoods with environmental hazards that put residents' health and safety at risk. TDHCA should: 1. Prohibit development sites within two miles of an active solid waste facility, sanitary landfill facility, waste transfer station, or illegal dumping sites. Currently, a new development cannot be 300 feet from an active solid waste facility; 2. Require rehabilitation projects at development sites where there has been documented history of rat or roach infestations, lead based paint, mold, or asbestos containing materials, or other conditions that make a housing development uninhabitable to provide TDHCA with detailed plans on how the developer plans to eradicate or remove the above-mentioned site features and how it plans to keep those features from returning. Including these solutions to these known fair housing impediments would ensure that TDHCA fulfills its AFFH obligations.

**Criminal History Lookback Period**

Criminal history restrictions disproportionately exclude people of color from housing, despite having little relationship with whether someone is a good tenant. More than nine million— or roughly 32%—of Texans have a criminal record.[15] Formerly incarcerated people are more than 10 times more likely to be unhoused than the general public.[16] With law enforcement in Texas making more than one million new arrests annually, this number is rapidly increasing.[17] Unfortunately, due to systemic biases in the criminal legal system, Black people are more likely to be arrested than white people.[18] In Texas, Black people constitute 13% of state residents, but

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[14] Amy McCaig, *Black Children in Houston at Higher Risk for Asthma*, RICE UNIV. (Mar. 20, 2017), https://news2.rice.edu/2017/03/20/black-children-in-houston-at-higher-risk-for-asthma/.

[15] Data from Tex. Dep't of Public Safety, Total number of people in Texas who currently have any type of criminal history record that has not been expunged or sealed.

[16] John Bae, *Opening Doors to Affordable Housing: The Low-Income Housing Tax Credit Program and People with Conviction Histories,* VERA INST. OF JUSTICE (April 2023), https://www.vera.org/downloads/publications/Opening-ItmDoors-to-Affordable-Housing-Report.pdf

[17] TEXAS APPLESEED, CLEAN SLATE TEXAS: RECORD SEALING CRIMINAL JUSTICE PROJECT ISSUE BRIEF (FEB. 2023), https://www.texasappleseed.org/sites/default/files/Issue%20Brief_Clean%20Slate%20Final%20(Feb%202023).pdf

[18] *See, e.g.,* Emma Pierson, et al., *A Large-Scale Analysis of Racial Disparities in Police Stops Across the United States*, NATURE HUMAN BEHAVIOUR, vol. 4, 736-745 (July 2020), https://www.nature.com/articles/s41562-020-0858-1 (analyzing data showing that police search Black and Hispanic drivers more often than White drivers, but are less likely to turn up contraband during searches of Black and Hispanic drivers compared to searches of White drivers, and are more likely to ); SUSAN NEMBARD & LILY ROBIN, URBAN INST., RACIAL AND ETHNIC DISPARITIES THROUGHOUT THE CRIMINAL LEGAL SYSTEM: A RESULT OF RACIST POLICIES AND DISCRETIONARY PRACTICES (2021) (citing multiple studies also showing the racial disparities in the criminal justice system cannot be explained by differences in criminality between racial groups, but instead can be explained by racial bias); A TALE OF TWO COUNTRIES: RACIALLY TARGETED ARRESTS IN THE ERA OF MARIJUANA REFORM, AM. CIVIL LIBERTIES UNION (2020) https://www.aclu.org/sites/default/files/field_document/marijuanareport_03232021.pdf (citing data showing that Black people are 3.6 times as likely to get arrested for marijuana possession than White people, despite similar usage rates)

27% of people in jail and 33% of people in prison.[19] Many housing providers exclude prospective tenants based on prior criminal legal contact—yet there is little evidence that such contact is predictive of whether someone will pay rent or cause an actionable nuisance.[20] The mere fact of an arrest or conviction does not predict whether a prospective tenant will be unable to pay rent, will pose a safety risk to other residents or staff, or will engage in other behaviors that merit exclusion.[21] Because they are more likely to have been arrested and convicted, Black Texans are disproportionately likely to be excluded from housing due to a criminal history screening.

As HUD has explained, unreasonable criminal history exclusions can violate the Fair Housing Act because they disproportionately exclude Black and Latinx people and are not related to a legitimate purpose.[22] In light of the persistent disparate impact of criminal history restrictions on Black and Latinx households, HUD recently released a proposed rule that provides additional clarity on when HUD-assisted housing providers can consider criminal history without violating the Fair Housing Act.[23] The proposed rule would revise existing regulations that govern admission for applicants to HUD-assisted housing with criminal records or a history of involvement with the criminal justice system. The proposed rule would require the establishment of a "lookback period" limiting the reliance on old convictions and would provide, for all programs, that prohibiting admission for a period of time longer than three years following any particular criminal activity is "presumptively unreasonable."[24] Furthermore, the proposed rule prohibits the consideration of arrest records standing alone (in the absence of other reliable evidence of criminal conduct) for any exclusion from housing.[25] While the rule is not yet finalized, TDHCA should take into account HUD's interpretation of the Fair Housing Act as embodied in the proposed rule in its 2024 Draft AI.

Though TDHCA acknowledged in its 2024 Draft AI that "criminal history that limits access to housing further compounds the challenges of reentry and may reduce success rates and increase recidivism," it made no concrete steps to rectify the impediment. TDHCA should affirmatively further fair housing by barring all criminal history screenings in LIHTC and HUD-backed properties. Currently, 10 TAC §10.802, the statute in Texas dealing with tenant selection criteria does not require that criminal history be included in any tenant selection criteria. Moreover, 10 TAC §10.802 requires that tenant screening criteria be "reasonably related to an applicant's ability to perform under the lease (for a Development with Multi-Direct Loan Program (MFDL)

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[19] VERA INST. OF JUSTICE, INCARCERATION TRENDS IN TEXAS (2018),
https://www.vera.org/downloads/pdfdownloads/state-incarceration-trends-texas.pdf
[20] Lauren Kirchner & Matthew Goldstein, *How Automated Background Checks Freeze Out Renters*, N.Y. TIMES (May 28, 2020), https://www.nytimes.com/2020/05/28/business/renters-background-checks.html.
[21] *Id.*
[22] U.S. Dep't of Hous. & Urban Dev., Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions 6 (Apr. 4, 2016), https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF (hereinafter "2016 Guidance").
[23] U.S. Dep't of Hous. & Urban Dev., Proposed Rule: Reducing Barriers to HUD-Assisted Housing, (Apr. 10, 2024), https://www.federalregister.gov/documents/2024/04/10/2024-06218/reducing-barriers-to-hud-assisted-housing
[24] *Id.*
[25] *Id.*

funding this means to pay the rent, not to damage the housing, and not to interfere with the rights and quiet enjoyment of other tenants)." Again, there is little evidence that prior criminal legal contact is predictive of whether someone will pay rent or cause an actionable nuisance, and the mere fact of an arrest or conviction does not predict whether a prospective tenant will be unable to pay rent, will pose a safety risk to other residents or staff, or interfere with the rights and quiet enjoyment of other tenants. In order to advance its AFFH obligations, TDHCA should encourage all housing providers to end or significantly reduce the practice of criminal history screening for tenants.

One troubling comment from TDHCA in the 2024 Draft AI indicated that removing criminal lookback periods would enable Not in My Back Yard (NIMBYs) to block affordable housing development, therefore reducing fair housing choice. This is an inaccurate interpretation of TDHCA's role in affirmative furthering fair housing. NIMBYism does not diminish TDHCA's AFFH obligations. As TDHCA itself acknowledged, while NIMBYism is an impediment to fair housing, when decisions "are made that are responsive to local opposition and NIMBYism, they may perpetuate or support the NIMBYism effect and limit the creation of affordable housing stock in diverse areas." Unfortunately, TDHCA comments indicate that TDHCA has fallen victim to the same arguments.

**Eviction Prevention**

Evictions disproportionately impact Black tenants and other tenants of color. Nearly 2.7 million Americans lose their homes through evictions every year, and millions more deal with threats of housing loss.[26] Black tenants, particularly Black women, experience evictions at higher rates than other racial/ethnic groups.[27] For example, a nationwide study by the Eviction Lab at Princeton University showed that nearly one in four Black renters nationally lived in a county in which the Black eviction rate was more than double the white eviction rate.[28]

Black tenants in Texas similarly experience disproportionate rates of eviction. As TDHCA pointed out in its 2024 Draft AI "evictions disproportionately faced Black households and households with children, both protected groups under the federal and Texas Fair Housing Act."[29] An analysis by LDF's Thurgood Marshall Institute found that, in Houston during the pandemic, 21.7% of citywide eviction filings occurred in census tracts with a majority Black population and 7.3% occurred in tracts with a predominantly Black population. By comparison, only 13% of eviction filings occurred in majority white tracts and 0.9% occurred in tracts with a population that

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[26] Ashley Gromis, et al., *Estimating eviction prevalence across the United States*, PNAS (May 16, 2022), https://www.pnas.org/doi/10.1073/pnas.2116169119.

[27] Peter Hepburn, et al., *Racial and Gender Disparities among Evicted Americans,* EVICTION LAB (Dec. 16, 2020), https://evictionlab.org/demographics-of-eviction/ ; Julieta Cuellar, *Effect of "Just Cause" Eviction Ordinances on Eviction in Four California Cities*, PRINCETON UNIV. J. OF PUB. & INT'L AFF. (May 21, 2019), https://jpia.princeton.edu/news/effect-just-cause-eviction-ordinances-eviction-four-california-cities

[28] Peter Hepburn, et al., *supra* note 21.

[29] 2024 Draft AI, *supra*, note 3.

was predominantly white.[30] Furthermore, as TDHCA notes in its 2024 Draft AI, researchers at Rice University found that 25% of students in the Houston Independent School District faced repeated eviction filings in a compressed time period. Among those evictions, more than 70% of the students living in a household that faced an eviction filing were Black, 25% were Hispanic, and less than 5% were white.[31]

Nevertheless, TDHCA did not mention evictions as an impediment to fair housing and there was no recommendation for eviction prevention in the recommendation section of the 2024 Draft AI. Evictions are not mentioned once in Chapter 11, the chapter that identifies and describes the actual impediments to fair housing choice. In its updated 2024 AI, TDHCA should include evictions as actual impediments to fair housing and recommend funding eviction prevention to remediate ongoing housing discrimination. Specifically, TDHCA should advocate for more eviction prevention funds into the Texas Rent Relief (TRR) program and for local jurisdictions to also invest in emergency rental relief programs. Emergency rental assistance enables families to afford decent and stable homes in difficult times. Research shows that rental assistance programs can sharply reduce homelessness, housing instability, poverty, as well as children's chances of long-term success.[32] During the pandemic, the TRR program assisted over 320,000 households with over $2.2 billion in rent and utility assistance and arrears. TDHCA should amend the 2024 Draft AI to recommend further emergency rental assistance.

**Conclusion**

While the 2024 Draft AI acknowledges many significant barriers to fair housing, it also fails to identify other persistent barriers or suggest meaningful actions that will eliminate those impediments. There are several meaningful actions that TDHCA should take that would overcome historic patterns of segregation, promote integration, increase access to opportunity, and ensure fair housing choice in the state, including changing policies to encourage LIHTC construction in high-opportunity neighborhoods, barring or significantly limiting criminal history screening, and uplifting and implementing eviction prevention measures aimed at keeping marginalized communities in their homes.

Thank you for the opportunity to comment. If you have any questions, please contact David Wheaton, Economic Justice Policy Fellow, at dwheaton@naacpldf.org, or Amalea Smirniotopoulos, Senior Policy Counsel & Co-Manager of the Equal Protection Initiative, at asmirniotopoulos@naacpldf.org.

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[30] COTY MONTAG, THURGOOD MARSHALL INSTITUTE AT NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC., THE EVICTION CRISIS AND ITS IMPACT ON BLACK COMMUNITIES: SPOTLIGHT ON HOUSTON, TEXAS, (April, 2021), https://tminstituteldf.org/wp-content/uploads/2020/05/LDF_04062021_TMIForeclosureAprUpdate-13.pdf.

[31] John Brannen, *As evictions reach historic levels in Harris County, families in Houston ISD are bearing the brunt,* KINDER INST. FOR URB. RES.AT RICE UNIV. (Mar. 21, 2023), https://kinder.rice.edu/urbanedge/evictions-reach-historic-levels-harris-county-families-houston-isd-are-bearing-brunt.

[32] Will Fischer, *Chart Book: Rental Assistance Reduces Hardship, Promotes Children's Long-Term Success, Center on Budget and Policy Priorities*, CTR. FOR BUDGET & POL'Y PRIORITIES (Jul. 5, 2016), https://www.cbpp.org/research/chart-book-rental-assistance-reduces-hardship-promotes-childrens-long-term-success.

Sincerely,

*David Wheaton*
_____
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Amalea Smirniotopoulos, Senior Policy Counsel & Co-Manager of the Equal Protection Initiative
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**TEXAS HOUSERS**
TEXAS LOW INCOME HOUSING
INFORMATION SERVICE
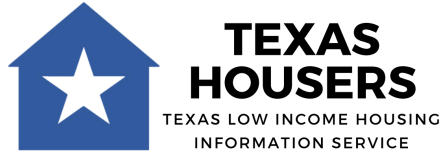
May 3, 2024

TDHCA
Fair Housing
c/o Housing Resource Center
P.O. BOX 13941
Austin, TX 78711-3941

RE: 2024 State of Texas Analysis of Impediments to Fair Housing Choice Draft Comments

To whom it may concern:

Thank you for the opportunity to comment on the 2024 State of Texas Analysis of Impediments to Fair Housing Choice Draft. For 35 years, Texas Housers has worked with community and neighborhood leaders across Texas to realize the Fair Housing Act's promise that every American can live in a safe and affordable home in the neighborhood of their choice, free from public and private discrimination. The infrequent update of the certification that the state is fulfilling its obligation to affirmatively further fair housing remains an incredible opportunity for the State of Texas and all agencies to choose to take a visionary course of meaningful action to achieve material change in fair housing outcomes in the state. With the 2024 Analysis of Impediments to Fair Housing Choice, Texas can choose to be a true leader in correcting historic and ongoing injustice and protecting Texans from discrimination and exclusion.

Texas Housers offers comments on the following pages.

Thank you,

Ben Martin
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*Texas Housers is a 501(c)(3) nonprofit organization founded in 1988 to work for housing justice and fair and equal treatment by government of communities. Our mission is to support low-income Texans' efforts to achieve the American dream of a decent, affordable home in a quality neighborhood of their choosing. We work toward these goals through research, policy, and collaboration with community organizations.*

The Texas Department of Housing and Community Affairs (TDHCA) has developed the Draft 2024 Analysis of Impediments to Fair Housing Choice (AI) on behalf of the State of Texas and all state agencies that receive US Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) funds to, in order to certify that the State of Texas is fulfilling its legal obligation to affirmatively further fair housing. We applaud TDHCA's work in leading Texas' efforts to fulfill this legal and moral obligation, which is critical to eliminating discrimination and exclusion in housing in the state, and to ensure that all Texans have equal opportunity to achieve a decent, affordable home in a neighborhood of their choice.

However, the 2024 Draft AI falls short in several ways, ranging from basic absence of a proactive approach to meeting the state's "affirmatively furthering" obligations, to omissions in the Texas fair housing legal landscape, a severely inadequate disaster recovery section, and incomplete discussions of several impediments and the actions needed to remedy them.

## ONE: The recommendations should not be limited only to actions that a handful of state agencies can undertake.

**We do not support TDHCA's decision to narrow the scope of recommendations to "actions that can be performed by the State."** Previous AIs included recommendations for actions local government and other organizations could take to mitigate impediments. The scope of the AI should remain broad in proposing actions to remove impediments to fair housing choice.

The State of Texas must show that it is prepared to use every tool in its toolbox to eliminate barriers to fair housing choice. While state agencies that use HUD funding are required to identify and implement actions to address impediments to fair housing choice, there is no requirement that limits agencies' actions to just the administration of HUD funds that the agencies manage. Agencies can and must identify actions that their agencies and the entire state government can take to increase fair housing choice which go beyond their use of HUD funds.

Our preliminary comments emphasized the need for "a thorough list of actions that the state government itself can perform that would achieve a material positive change in eliminating the identified barriers," but this does not mean the AI should be limited in scope to *only* those actions the state agencies listed in the document can undertake. The AI should be a guiding document for the state, and should note best practices and potential actions that other bodies, including private sector partners, can take to eliminate barriers to fair housing, as long as those actions are meaningful. Per the Affirmatively Furthering Fair Housing (AFFH) Interim Final Rule (IFR), meaningful actions are "significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing."[1]

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[1] Restoring Affirmatively Furthering Fair Housing Definitions and Certifications, 86 FR 30779-01. (2021). https://www.govinfo.gov/content/pkg/FR-2021-06-10/pdf/2021-12114.pdf

While we understand that the state agencies involved in drafting the AI do not have direct decision making power over actions by local governments, Public Housing Agencies (PHAs), private partners, or the state legislature, individual state agencies and the state government as a whole must lean into the development of a statewide vision for fair housing by leading, coordinating, convening, researching, educating, and training. Similarly, while state agencies do not have power over legislative decisions, the AI should be used to identify barriers to fair housing choice that those legislative decisions contribute to and recommend actions that can eliminate those barriers.

Given the interwoven nature of funding from different housing and community development programs, fair housing issues should be discussed holistically. For example, because Low Income Housing Tax Credit (HTC or LIHTC) properties cannot discriminate against tenants based on source of income, HTC housing is an important source of housing for voucher families. By avoiding discussion of solutions that may be out of these specific agencies' reach, the draft reveals limitations of the State's understanding of the complexity of fair housing issues and the state's leadership role in remedying them.

TDHCA and the Texas agencies that receive CPD funds should not construe this point to suggest that leading, coordinating, convening, researching, educating, and training are sufficient activities to meet their fair housing obligations. As we will discuss, the agencies themselves can take many specific actions to have a direct, meaningful impact on eliminating impediments to fair housing choice. Furthermore, agencies also have the responsibility to monitor contracted vendor activity to ensure that their actions with awarded funds are directly fulfilling the obligation to affirmatively further fair housing choice.

## TWO: The AI does not show a proactive commitment to the obligation to *affirmatively further* fair housing.

**The complexity of housing programs and relatively passive nature of agency planning processes are themselves impediments to fair housing.** Agency planning processes largely rely on meeting minimum community engagement requirements. The result largely fails to actively engage tenants and beneficiaries of programs. This presents a distinct failure to *affirmatively further* fair housing.

Input from developers, as well as other professionals that have technical expertise but almost always do not have lived experience, are heavily prioritized in TDHCA meeting formats, public comment, and culture. TDHCA and other state agencies must dramatically shift this mindset and begin to take actions that show that they consider low-income people themselves, who are disproportionately members of protected classes, as primary stakeholders in decision making. TDHCA should provide opportunities for public input that are geared towards those who are not already familiar with program rules, may not fully understand what is under the authority of the agency gathering input, and may not have the time or resources to learn those things on their own.

The AI is a 500 page document that is primarily dense contextual data and information. There is not a substantial summary provided that might make the document more accessible for the general public, including tenants of state-subsidized properties. For example, the AI could include a more robust executive summary that briefly explains the listed impediments or move the majority of contextual or supporting information and recordkeeping to appendices and let the main report focus on impediments and recommendations.

The use of simple visualizations and dashboards employed by TDHCA in the AI draft are a positive step towards making products that are more accessible for the general public, which enables better engagement. The AI has several examples of good uses of Tableau (e.g., Figure 2-2's map allows interactive exploration of the types of neighborhoods where HTC properties are located), and Texas Housers supports TDHCA using technology to improve communication of data. Concise summaries of key information in the supporting narrative ensures that people who use screen readers have equal access to information. TDHCA must ensure that visualizations remain accessible as long as the AI is online.

**The public consultation process for the 2024 AI was insufficient.** We understand that TDHCA was not required to do a more substantial consultation process, but since TDHCA chose to update the AI to fulfill their fair housing obligations, the agency (and all agencies that receive HUD CPD funds) should have placed more of an emphasis on engagement and actively seeking input from beneficiaries of state funds. This document is still an important resource for a wide range of stakeholders and meaningful engagement is a critical aspect of fulfilling Texas' obligation to *affirmatively further* fair housing by prioritizing impacted people in protected classes in decision making.

Public consultation for the 2024 AI consisted of a Google Form survey (which resulted in fewer than 10 written responses) and the addition of the AI to the agenda of two council meetings run by TDHCA. Despite what the AI draft states, this is not a robust consultation. The 2019 public consultation process was significantly more robust. In that process, the State conducted more than 40 separate consultations all over Texas to gather input, 30 of which were open to the general public, translated materials into Spanish and Vietnamese, and received input from over 500 participants.[2] While it is understandable that TDHCA would not want to conduct the same level of consultation when there is not a requirement for a specific planning document, this is an overcorrection that harms the usability and value of the AI. Real robust public consultation is work that TDHCA could and should have done.

The 2024 AI appears to frequently rely on input provided during the consultation process for the 2019 AI, but presents this input as current to the 2024 AI. This is misleading. For example, the AI states that "Numerous stakeholders input on the need for financial literacy education to improve credit ratings for households seeking lending products" (p. 249). However, none of the written comments included in the draft mentions financial literacy, this is the only mention of financial literacy in the entire AI, and that sentence is almost a direct copy from the 2019 AI. In

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[2] Texas Department of Housing and Community Affairs. (2019). *State of Texas Analysis of Impediments to Fair Housing Choice*. https://www.tdhca.state.tx.us/fair-housing/docs/19-AI-Final.pdf p. 11-15

addition, all of the comments on impediments and recommendations for rural areas appear to have come from rural-specific consultation that occurred in 2018 but was not revisited in the consultation for the 2024 AI.

**The AI relies too heavily on education and outreach as actions to address impediments.** TDHCA must identify meaningful actions that will eliminate impediments, meaning "significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing."[3] Actions that commit TDHCA and other impacted agencies to teaching, training, and informing various stakeholders of fair housing law, responsibilities, and rights are extremely important, but ambitious actions to counteract the existing impact of discrimination and segregation are also required. TDHCA and the State of Texas must use the AI process to commit to meaningful, measurable actions that will actually contribute materially to eliminating impediments. Allowing recommendations that apply to policies and programs outside of the agencies responsible for the AI's control will help address this issue, as will more seriously interrogating the levers available to the agencies themselves to contribute to eliminating barriers.

**TDHCA should take a more proactive role in its relationship with advocates and tenants.** We are concerned with commentary about advocacy groups in the AI draft. Staff comments and AI recommendations indicate that TDHCA is relying on advocates to suggest specific nonprofits and service providers to work with. For example, the AI recommendations note that "Advocacy groups can become an important part of providing meaningful services like child care in LIHTC properties" (p. 258). This is not the primary, appropriate role of advocacy organizations or the function of advocacy. Ultimately, TDHCA should work to foster the agency's own connections with service providers. Advocates cannot be expected to do this work for the state, though they can and should play an important role in guiding and supporting this work.

The AI states that TDHCA hosts webinars for advocates. Texas Housers staff seeks out information about opportunities for TDHCA training, but has yet to see webinars that are specifically advertised to advocates or tenants. There is a lack of clear guidance and communication from TDHCA when a training would benefit tenants or the general public who are not experts but are interested in TDHCA's programs. For example:

- A March 28, 2024 email regarding joint TDHCA/Texas Workforce Commission (TWC) fair housing training announced three webinars at once with no followup leading up to the three events. The email does not mention the intended audience and only minimal information is provided on what will be discussed at the events. Language is simple and clear, but the lack of information and lack of care in engaging potential attendees undercuts the attempt at outreach to the general public/tenants, if that is the actual intent of the training, which is unclear.
- An April 22, 2024 email about virtual compliance monitoring roundtable: "Participants are invited to discuss proposed changes to 10 TAC Chapter 10, Subchapter F, the

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[3] National Low Income Housing Coalition. (2023). *NLIHC Advocates' Guide '23.* https://nlihc.org/explore-issues/publications-research/advocates-guide, p. 8-15

Compliance Monitoring Rules, that staff plan to present to the TDHCA Governing Board at its July 11 meeting." This email accurately describes what the meeting is about, but does not link to the section of Texas Administrative Code (TAC) in question, does not clearly state who the event is for, and is not written in a way to suggest that this would be a good opportunity for tenants or members of the public who are not familiar with more technical language or TAC to participate.

- An April 23, 2024 email about compliance training in College Station: "This training will be led by TDHCA compliance staff and provides a solid foundation of information that owners, managers, and on-site staff need to know to be in compliance with requirements for the HTC program." This email does a good job of clearly stating who the training is for. It provides bare minimum information, but is intended for a more knowledgeable audience who do not necessarily need details. TDHCA should similarly provide this kind of clarity of communication about intended audiences for engagements targeted to tenants, impacted people, and the general public.

TDHCA should offer targeted events and resources to tenants to inform them of their rights. TDHCA should offer tenants rights training for both tenants who do and do not reside at subsidized properties. Events that could benefit tenants should clearly state when that is the case. These events and resources should be presented in plain and understandable language, and should be accessible to those with limited English proficiency. TDHCA should also improve outreach and education directly to tenants, including through tenant surveys.

**In order to affirmatively further fair housing, TDHCA must place tenant expertise at the center of relevant recommendations.** Tenants and beneficiaries of TDHCA programs are the experts in what barriers they face to fair housing choice. Tenants and program beneficiaries know what they need, though they may not be able to communicate those needs in the specific programmatic or bureaucratic terms the way that program administrators, subrecipients, and awardees can. Increasing proactive communication directly with populations TDHCA serves improves the agency's ability to identify and address barriers to fair housing choice and will improve outcomes for those populations. Without this active engagement, the loudest voices in shaping TDHCA policy from outside the agency will continue to be administrators, subrecipients, and awardees whose interests do not always align with the interests of beneficiary populations who are disproportionately members of protected classes. As one community member told Texas Housers when asked what the State could do to improve fair housing choice, "Podrian comenzar escuchando a las personas e inquilinos" ("They could start by listening to people and tenants").

TDHCA should add a recommendation to notify existing tenants of a property when that property applies for rehabilitation funds. Texas Housers has commented on this in the past on draft Qualified Allocation Plans (QAPs). This would help tenants advocate for themselves during the application process and give them the opportunity to communicate with TDHCA should there be any major concerns regarding rehabilitation or relocation, which is a common issue Texas Housers hears about from tenants at subsidized properties. This gives tenants the same opportunity as neighborhood groups that are notified when applications are submitted, which is

a contributing factor to the Not In My Backyard (NIMBY) impediment as defined by TDHCA. Notifying tenants at existing HTC properties does not have the same impact on fair housing choice as notifying neighborhood groups that may contribute to NIMBY sentiment. It improves fair housing choice by empowering tenants, many of whom are members of protected classes, in guiding rehabilitation of properties where they reside.

The AI recommendations should require that tenants inform the updates to the Tenants Rights and Resources Guide. Tenants should be involved not only in potential additions but more robust updates to simplify the document and emphasize information that is the most important to tenants. This can help TDHCA communicate issues related to fair housing and tenant rights more clearly and address community members' concerns regarding the need for more education. TDHCA should focus on creating a simple resource in a visually pleasing format, with less reliance on text-only communication, and should provide the resource in additional languages.

As Texas Housers has pointed out in previous public comments, TDHCA (and other agencies) must survey tenants at properties in their portfolio regularly. The AI includes recommendations to alter the number and variety of services provided to tenants at tax credit properties, but does not include a recommendation to involve tenants in that process. Tenants are the experts in what services they want and should help inform what is considered an impactful service to have at their apartment complex.

Outreach to tenants in recent years has been sporadic at best, and it is no secret that there is a huge chasm between the experience and expertise between tenants and HTC developers. To address this, TDHCA should consider:

- Setting a regular survey schedule;
- Partnering with academic projects and departments to survey tenants effectively;
- Ensuring that survey topics are updated to reflect current issues and needs; and
- Embarking on deeper reflection and changes to meeting formats, public comment approach, and organizational culture to prioritize a central role for low-income tenants themselves, who are disproportionately people of color and other protected groups, in decision making.

Surveys take time to plan and execute. TDHCA should create a long-term plan for surveying tenants and ensure that future QAP updates take survey results into account. The timeline of surveying should not stop TDHCA from making changes that are known to benefit tenants, such as incentivizing eviction prevention (case workers, payment plans, waiving late fees, etc.) at properties in TDHCA's portfolio.

Texas Housers' own outreach to community members regarding fair housing issues revealed concerns that are not captured in the 2024 AI draft. For example:

- Issues of overcomplicated program and educational materials,
- Issues with poor conditions at subsidized properties,

- The need for preservation and more funding for deeply affordable housing,
- Issues with inadequate relocation during rehabilitation,
- Issues with discriminatory behavior of property management staff,
- The need for better information on renters' and homeowners' rights,
- Issues of language access across programs,
- The ability of families with mixed status to access benefits,
- Home valuation for disaster recovery related buyouts reinforcing issues of discrimination in home appraisals, and
- The Texas General Land Office's (GLO's) failure to engage with the community and address issues of discrimination in program outcomes.

## THREE: The disaster recovery portion of the AI is severely inadequate and deficient.

**The public was not provided an adequate opportunity to engage with the GLO on the disaster recovery section of the AI.** As we noted in our preliminary comments, all agencies that receive HUD funding must meaningfully participate in the AI process and address impediments. We were concerned about meaningful participation from the GLO, and those concerns proved to be valid.

It is still unclear whether all the agencies involved in Texas' AI viewed the early input received or will view comments on the draft document. So far, it appears that all public input has been addressed to and collected by TDHCA. Based on staff comments, TDHCA does not appear to be willing to address GLO's fair housing issues.[4] We ask again that TDHCA and other involved agencies develop transparent processes to take in and respond to public comment that extends to other agencies beyond TDHCA. Difficulty engaging with the GLO to push for community concerns to be heard has been echoed by many groups and individuals that Texas Housers works with as a persistent issue with the GLO's programs and should be a priority in any updates to the AI, especially given the substantial levels of funding for housing and community development that flows through the GLO and the history of fair housing legal challenges in the administration of disaster recovery and mitigation funding in the state.

**The "Disaster Recovery in Texas" chapter fails to include key information relating to fair housing and disaster recovery in Texas and ignores discriminatory behavior.** The 2024 AI does not mention historic disinvestment in infrastructure and vulnerability that makes low income communities of color disproportionately more vulnerable to natural disasters, a known issue in Texas cities like Houston.[5] The section of the disaster recovery chapter that discusses

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[4] Texas Department of Housing and Community Affairs. (2024, April 3). Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice. https://www.tdhca.texas.gov/sites/default/files/fair-housing/docs/24-Tx-AI-Draft.pdf Appendix G, p. 477

[5] Houston knew neighborhoods of color were inadequately protected from even modest storm events. (2017, August 31). *Texas Housers*. https://texashousers.org/2017/08/31/houston-knew-neighborhoods-of-color-wereinadequately-protected-from-even-modest-storm-events/

the cumulative impact of recent disasters fails to acknowledge that those most harmed by that cumulative impact are members of protected classes.[6]

In fact, the disaster recovery chapter does not mention the words fair housing, discrimination, or protected classes until the discussion of impediments, 21 pages into the 26 page GLO chapter. Even then, those mentions are only in response to the impediments apparently generated by TDHCA. That is 20 pages of ignoring the point of the document and failing to address a problematic past with fair housing, civil rights, and disaster recovery in Texas, and resulting efforts to further fair housing principles in these programs, such as the Fair Housing Activity Statement Texas (FHAST) Form used during the 2013 AI process.

The Disaster Recovery in Texas chapter fails to mention that the HUD Region VI Office of Fair Housing and Equal Opportunity found that the GLO discriminated against communities of color in distributing Community Development Block Grant Mitigation (CDBG-MIT) funds related to Hurricane Harvey.[7] As HUD's Letter of Finding stated:

> First, GLO excluded areas designated by HUD as most impacted and distressed from competing for 50% of the Competition funds, though nearly 90% of the eligible population resided in those areas. Second, GLO scored applicants based on jurisdiction size, providing more points to a smaller jurisdiction than it would to a larger jurisdiction for an equivalent project. GLO utilized both of these criteria even though they disadvantaged areas with the greatest mitigation needs by

Natural Disaster Risks in Houston. (n.d). *Understanding Houston*. https://www.understandinghouston.org/topic/disasters/disaster-risks#flooding_risks

Bidadian, B., Strager, M. P., Butler, P., & Ghadimi, H. (2024). Flood Risk Impacts from an Unlikely Source: Redlining Efforts of the 1930s in Houston, Texas. *Environmental Justice*. https://doi.org/10.1089/env.2023.0027

Hendricks, M. D., & Van Zandt, S. (2021). Unequal Protection Revisited: Planning for Environmental Justice, Hazard Vulnerability, and Critical Infrastructure in Communities of Color. *Environmental Justice*, 14(2), 87–97. https://doi.org/10.1089/env.2020.0054

Flores, A. B., Collins, T. W., Grineski, S. E., Griego, A. L., Mullen, C., Nadybal, S. M., Renteria, R., Rubio, R., Shaker, Y., & Trego, S. A. (2021). Environmental Injustice in the Disaster Cycle: Hurricane Harvey and the Texas Gulf Coast. *Environmental Justice*, 14(2), 146–158. https://doi.org/10.1089/env.2020.0039

Katz, L. (2021, March 15). A Racist Past, a Flooded Future: Formerly Redlined Areas Have $107 Billion Worth of Homes Facing High Flood Risk—25% More Than Non-Redlined Areas. Redfin Real Estate News. https://www.redfin.com/news/redlining-flood-risk/

[6] Howell, J., & Elliott, J. R. (2018). As Disaster Costs Rise, So Does Inequality. Socius: Sociological Research for a Dynamic World, 4, 237802311881679. https://doi.org/10.1177/2378023118816795

Adepoju, O. E., Han, D., Chae, M., Smith, K. L., Gilbert, L., Choudhury, S., & Woodard, L. (2022). Health Disparities and Climate Change: The Intersection of Three Disaster Events on Vulnerable Communities in Houston, Texas. *International Journal of Environmental Research and Public Health*, 19(1), Article 1. https://doi.org/10.3390/ijerph19010035

[7] It also does not mention the 2010 conciliation agreement between TDHCA, Texas Appleseed, and Texas Housers that resulted from a fair housing complaint. https://www.texasappleseed.org/sites/default/files/ApprovedConciliationAgreement.pdf

GLO's own measure and ran counter to the intended focus on low- and moderate-income (LMI) households.[8]

Not only did these criteria counter the intended focus on LMI households and areas with the greatest mitigation need, but they also excluded areas that had significantly higher Black population shares to the benefit of areas that had significantly higher white population shares. HUD found that these criteria "disparately impacted minority residents."[9]

The GLO's failure to meet fair housing obligations extends beyond CDBG-MIT. Regarding the distribution of over $5 billion of CDBG-Disaster Recovery (CDBG-DR) funds for recovery from Hurricane Harvey, the GLO failed to adequately respond to the disaster recovery needs of renters, who are disproportionately Black and Hispanic or Latino.[10] Only $250 million of these funds were initially allocated to the recovery needs of renters through the Affordable Rental Program, later raised to nearly $590 million, despite the GLO finding that renters' recovery needs totaled more than $1.85 billion.[11] Furthermore, while GLO homeowner programs tied benefits directly to impacted households, the GLO provided no similar mechanism to ensure that impacted renter households would be the direct beneficiaries of funding. The GLO also failed to adequately provide Spanish-language translation of CDBG-DR Housing Guidelines.

None of this is discussed in the disaster recovery chapter, despite all being pointed out by advocates in past public comments to the GLO and in preliminary comments regarding Texas' 2024 AI. The GLO's own actions are on their face an impediment to fair housing.

**The GLO and disaster recovery funding barely appear in the impediments and recommendations chapters of the AI (Chapters 11 and 12).** The AI's impediment relating to "unpredictable events or economic shocks and resulting economic disruptions" fails to mention the disproportionate impact natural disasters have on Texans who are members of protected classes. This impediment should be expanded to address the regional economic shocks

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[8] Lewis, C. (2022). *Letter Finding Noncompliance with Title VI and Section 109*. U.S. Department of Housing and Urban Development. https://texashousers.org/wp-content/uploads/2022/03/HUD-Letter-Finding-Noncompliance-with-Title-VI-and-Section-109-.pdf, p. 2

[9] Lewis, C. (2022). *Letter Finding Noncompliance with Title VI and Section 109*. U.S. Department of Housing and Urban Development. https://texashousers.org/wp-content/uploads/2022/03/HUD-Letter-Finding-Noncompliance-with-Title-VI-and-Section-109-.pdf, p. 12

[10] Kate Rainey. (2018). *Housing Discrimination Complaint*. Texas Rio Grande Legal Aid, Inc. and Texas Housers. https://texashousers.org/wp-content/uploads/2024/05/19-238827-2018-06-26-housing-discrimination-complaint-state-of-texas-2.pdf

[11] Texas General Land Office Community Development and Revitalization Program. (2018, June 25). *State of Texas Plan for Disaster Recovery: Hurricane Harvey - Round 1.* https://recovery.texas.gov/documents/action-plans/2017-hurricane-harvey/harvey-5b-sap.pdf p. 89

Texas General Land Office Community Development and Revitalization Program. (2024, March 11). *State of Texas Plan for Disaster Recovery: Amendment 14: Hurricane Harvey - Round 1.* https://recovery.texas.gov/documents/action-plans/2017-hurricane-harvey/5b-sap-amend-14.pdf p. 164 and 61

experienced in the wake of a natural disaster. There is ample research regarding the disproportionate impact of natural disasters that should be noted.[12]

One of the rare appearances of the GLO and disaster recovery funding in the AI recommendations section suggests that the GLO should focus housing rehabilitation in "areas…seeing rapid demographic shifts, such as more rural areas." This is very problematic considering that the diversion of funds from urban communities of color to whiter, rural communities was the foundation of HUD's finding of discrimination against the GLO. The recommendations should not direct the GLO to increase the share of rehabilitation funding allocated to rural areas to benefit elderly and/or disabled people, as elderly and/or disabled people also live in urban areas and are in need of rehabilitation assistance, particularly as a means of fighting displacement.

It is Texas Housers' understanding that contrary to what is written in the draft AI, the GLO did not "conduct AFFH reviews in coordination with Texas Appleseed." This text in the disaster recovery chapter should be edited for accuracy and the AI recommendations should direct the GLO to commit to coordinate with fair housing organizations including Texas Appleseed to conduct meaningful, substantive AFFH reviews.

Texas Housers has heard from community members that many documents relating to GLO-administered disaster recovery programs, notably home buyouts, were only available in English. This presents a barrier to accessing housing programs based on national origin that should be noted as an impediment. A potential recommendation to address this issue is to require that program communications be sent in the language of the applicant. Further, these buyouts depended on home value appraisals that reinforce existing disparities in appraisals for Black families.[13]

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[12] Zahran, S., Brody, S. D., Peacock, W. G., Vedlitz, A., & Grover, H. (2008). Social vulnerability and the natural and built environment: A model of flood casualties in Texas. Disasters, 32(4), 537–560. https://doi.org/10.1111/j.1467-7717.2008.01054.x

Emrich, C. T., Tate, E., Larson, S. E., & Zhou, Y. (2020). Measuring social equity in flood recovery funding. Environmental Hazards, 19(3), 228–250. https://doi.org/10.1080/17477891.2019.1675578

Lieberknecht, K., Zoll, D., Jiao, J., & Castles, K. (2021). Hurricane Harvey: Equal opportunity storm or disparate disaster? Local Environment, 26(2), 216–238. https://doi.org/10.1080/13549839.2021.1886063

Tate, E., Rahman, M. A., Emrich, C. T., & Sampson, C. C. (2021). Flood exposure and social vulnerability in the United States. Natural Hazards, 106(1), 435–457. https://doi.org/10.1007/s11069-020-04470-2

Finucane, M. L., May, L. W., & Chang, J. (2021). A Scoping Literature Review on Indicators and Metrics for Assessing Racial Equity in Disaster Preparation, Response, and Recovery. RAND Corporation. https://doi.org/10.7249/RRA1083-1

[13] Howell, J., & Korver-Glenn, E. (2018). Neighborhoods, Race, and the Twenty-first-century Housing Appraisal Industry. *Sociology of Race and Ethnicity*, 4(4), 473–490. https://doi.org/10.1177/2332649218755178

Neal, M., Strochak, S., Zhu, L., and Young, C. (2020, December). How Automated Valuation Models Can Disproportionately Affect Majority-Black Neighborhoods. *Urban Institute*. https://www.urban.org/sites/default/files/publication/103429/how-automated-valuation-models-can-disproportionately-affect-majority-black-neighborhoods_1.pdf

FOUR: While the AI includes a more substantial discussion of fair housing issues at HTC properties than past AIs, not all relevant issues are addressed.

**We support TDHCA's decision to expand the scope of the AI to include fair housing issues at tax credit properties**. As noted by our peers in preliminary comments, this complies with federal regulation and guidance:

- Internal Revenue Service (IRS) guidance states that HTC programs are covered by AFFH obligations.[14]
- The 2021 HUD AFFH regulation explains that "the duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development."[15]

To align with this update, Chapter 1 should include a brief discussion of the tax credit program alongside HUD CPD programs.

**The AI fails to properly address poor conditions at properties more likely to house members of protected classes.** Black and Hispanic/Latino households are overrepresented among the households eligible for rental housing in TDHCA's portfolio. This means that the quality and conditions of properties in the portfolio should be treated in the AI as a fair housing consideration. The following table shows that renters, particularly those with incomes at or below 80% Area Median Income (AMI), are disproportionately members of protected classes.

**Share of Households that are Members of Protected Classes, 2020**

|  | Share of TX Households | Share of TX Renter Households | Share of TX Renter Households with Incomes <= 80% AMI |
|---|---|---|---|
| White, Not Hisp/Latino | 49.0% | 38.2% | 31.9% |
| Black, Not Hisp/Latino | 12.6% | 19.6% | 22.0% |
| Hipanic or Latino | 31.9% | 35.4% | 40.4% |
| Households with at least one member with a disability* | 24.4% | 21.9% | 26.6% |
| Households with at least one Child | 17.8% | 20.2% | 23.1% |

Source: HUD CHAS 2016-2020, Tables 1, 6, 7, 9, and 13.

*Includes hearing or vision impairment, ambulatory limitation, cognitive limitation, or self-care or independent living limitation.

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[14] Internal Revenue Service. (2016). Revenue Ruling 2016-29. https://www.irs.gov/pub/irs-drop/rr-16-29.pdf p. 6

[15] Restoring Affirmatively Furthering Fair Housing Definitions and Certifications, 86 FR 30779-01. (2021). https://www.govinfo.gov/content/pkg/FR-2021-06-10/pdf/2021-12114.pdf

TDHCA staff comments are dismissive of concerns raised in preliminary comments regarding the agency's inspections and compliance process,[16] which has allowed properties with terrible housing conditions to slip through the cracks. For example, Bexar Creek in San Antonio received 9% tax credits in 2003. This property is still in its extended use period and not at immediate risk of losing affordability. The last inspection scores accessed by Texas Housers show a score of 81 out of 100 in June 2021. However, Bexar Creek tenants and the Texas Organizing Project (TOP) have repeatedly been in the news reporting poor conditions at the property, including issues with pests and mold and fear of retaliation.[17] TDHCA needs to acknowledge and address shortcomings in their knowledge of and response to conditions issues at properties in their portfolio. Texas Housers has heard from many community members struggling with conditions at their properties, many of whom have limited English proficiency, sometimes exacerbated by dismissive or discriminatory attitudes of property management staff.

TDHCA's Housing Program and Portfolio Analysis should include a discussion of inspection scores, violations, and tenant and neighborhood populations. Data enabling that analysis should be made publicly available. This analysis would help ensure that members of protected classes are not denied equal access to quality housing.

The 2024 AI should include actions that ensure that physical inspections are thorough and accurate; that property condition complaints are addressed swiftly; that capital needs are identified and addressed; that rehabilitation is high quality; that tenants at properties are given notice of failed inspections and other known concerns about conditions at their properties; and that TDHCA takes a more proactive approach to communicating to tenants at properties in the portfolio that they have available recourse by filing a complaint with TDHCA, which we find many tenants are not aware of. Tenants also frequently express fear of retaliation and do not want property management to know they have submitted a complaint. TDHCA shares the names of complainants with properties upon request, despite no rule in state statute or administrative code requiring this.

The AI mentions rehabilitation frequently in impediments and recommendations without acknowledging concerns from tenants that current rehabilitation projects are inadequate and expose tenants to harmful living situations. Where funds are used to rehabilitate properties with a current LURA, tenants should have a greater say in the rehabilitation and relocation process.

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[16] Texas Department of Housing and Community Affairs. (2024, April 3). Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice. https://www.tdhca.texas.gov/sites/default/files/fair-housing/docs/24-Tx-AI-Draft.pdf Appendix G, p. 479

[17] Tiede, Hannah. (2024, February 1). Living in 'fear and filth': Renters are fed up with west-side apartment complex. *KENS 5.* https://www.kens5.com/article/news/local/living-in-fear-filth-renters-fed-up-with-west-side-apartment-complex/273-f17ca96f-5aba-4691-902b-78107ce14e67
Henderson, Amanda. (2024, February 2). Renters are fed up with 'unsanitary conditions' as they feel management isn't helping. *News 4 San Antonio.* https://news4sanantonio.com/news/local/renters-are-fed-up-with-unsanitary-conditions-as-they-feel-management-isnt-helping

Many properties have accessible units that were never inspected by TDHCA compliance before being put into service, due to the reliance on inspection of a selection of random units and historical reliance on third-party inspections. This results in accessibility issues that impact tenants with disabilities' safety and quality of life. We support Disability Rights Texas in asking for recommendations that prioritize inspection of accessible units in older properties.

**The AI does not adequately address exclusion through the HTC program.** Research from the Inclusive Communities Project (ICP) shows that HTC projects are disproportionately and overwhelmingly located in Black and Hispanic/Latin American neighborhoods, which limits fair housing choice for tenants of subsidized properties.[18] TDHCA must ensure that exclusionary, high opportunity neighborhoods and communities where there is NIMBY opposition to low-income housing are not able to just take elderly properties to fulfill their share of low-income housing. This outcome has a discriminatory impact on the basis of familial status and other protected classes.

*Barriers for specific property types*

TDHCA's analysis of 9% applications corroborates Texas Housers' comment that in many cities only elderly properties are placed in high income, white neighborhoods, a pattern which denies housing opportunities to members of protected classes such as larger families and persons with disabilities. However, TDHCA did not provide a detailed analysis of this issue in the "LIHTC Units by Property Type" section of the Housing Program and Portfolio Analysis. TDHCA should take the extra step to identify specific patterns and areas of concern. For example, it is noteworthy that the majority of HTC units awarded in high income, majority white tracts in Houston since 2017 have been for elderly tenants.[19]

Despite staff comments indicating some interest in including recommendations to either open elderly only properties to families with children or set a limit to the number of elderly-only awards in a given tract, the AI does not include recommendations to address this specific issue. The AI notes that "preference for elderly housing may result in affordable housing developers feeling pressure to take the path of least resistance to avoid the opposition." (p. 247) Removing potential opposition, such as eliminating the requirement for representative letters from state statute, would help remove the power of the elderly preference in high income, white neighborhoods. These actions should be included as recommendations.

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[18] Texas Department of Housing and Community Affairs. (2024, April 3). *Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice*.
https://www.tdhca.texas.gov/sites/default/files/fair-housing/docs/24-Tx-AI-Draft.pdf Appendix G, p. 444

[19] Texas Housers. (2023, December). *How to Improve Housing Tax Credits for Low Income Texans: 2024 QAP Report*.
https://texashousers.org/wp-content/uploads/2023/12/How-to-Improve-Housing-Tax-Credits-for-Low-Income-Texans-2024-QAP-Report.pdf p. 25
Texas Department of Housing and Community Affairs. (2024, April 3). *Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice*.
https://www.tdhca.texas.gov/sites/default/files/fair-housing/docs/24-Tx-AI-Draft.pdf Appendix G, p. 483

*Barriers created by local approval requirements*

The state should re-evaluate the role local approval plays in the HTC application process, which has been a known issue since before the prior AI.[20] This would be a direct evaluation of the impact NIMBYism has on fair housing choice for HTC tenants, an identified impediment. This would also be in line with IRS guidelines. In 2016, the IRS ruled that "practice of requiring local approval has created a pattern of allocating housing credit dollar amounts that has perpetuated residential racial segregation," which is inconsistent with the Fair Housing Act.[21]

State requirements for consideration of local support should be mentioned in the Chapter 4 review of relevant state-level laws, not just Tex Gov't Code §2306.6710(b)(1)(J). Specifically, Chapter 4 does not mention §§2306.6725(a)(2) and 2306.6710(b)(1)(I), both of which cover topics mentioned specifically in the IRS ruling. In addition, while the impediments in Chapter 11 allude to §§2306.1114; 2306.6710(b)(1)(I) and (J); 2306.6710(f) and (g); and 2306.6725(a)(2), the AI needs to call out these specific sections of code as impediments.

TDHCA should be careful to balance the pros and cons when evaluating the impact of local government support. The AI notes that some cities use the 4% HTC requirement for local government support in Tex Gov't Code §2306.6707 as a NIMBY tool to block affordable housing. However, other cities may use local support requirements as a mechanism to secure additional concessions from applicants to increase the benefit to low-income tenants.

The AI should recommend eliminating the requirement in state statute that TDHCA consider a letter of support from the relevant state representative when awarding HTC funds (Tex Gov't Code §§2306.6710(b)(1)(J) and 2306.6710(f) and (g)). Texas Housers' review of letters of support found that applications that receive letters or resolutions of support tend to be less white and have higher poverty rates, even accounting for the change allowing applicants without letters of support to substitute support from the local government (enabled by Tex Gov't Code §2306.6710(g)).[22]

*Addressing attempts to weaken rules preventing concentration of HTC properties*

The AI should recommend that TDHCA and the State block efforts to water down provisions that support fair housing choice, such as recent attempts to weaken "Underserved" provisions in the QAP, which could have the effect of allowing for backsliding and more concentration of HTC properties in racially and ethnically concentrated areas of poverty and would violate the

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[20] IRS indicates fair housing issues with Texas political influence on tax credits. (2017, January 9). *Texas Housers*. https://texashousers.org/2017/01/09/irs-indicates-fair-housing-issues-with-texas-political-influence-on-tax-credits/

[21] Internal Revenue Service. (2016, December 27). Internal Revenue Bulletin: 2016-52. https://www.irs.gov/irb/2016-52_IRB

[22] Texas Housers. (2023, December). *How to Improve Housing Tax Credits for Low Income Texans: 2024 QAP Report.* https://texashousers.org/wp-content/uploads/2023/12/How-to-Improve-Housing-Tax-Credits-for-Low-Income-Texans-2024-QAP-Report.pdf p. 24-5

agency's duty to affirmatively further fair housing choice. There have been recent efforts at both the state legislature and QAP roundtables to loosen deconcentration and Underserved rules in the QAP. While there were some changes during the 2024 QAP development cycle, it is not yet clear what impact those changes may have had. TDHCA should resist any further changes to the QAP that would allow additional concentration in the siting of HTC-funded properties and should closely monitor how recent changes impact siting of new applications.

As Texas Housers has stated before, preventing concentrations of affordable housing by incentivizing HTC development in high-opportunity, exclusive areas has been found to be associated with HTC awards in low-poverty neighborhoods.[23] This is extremely beneficial for tenants who may be harmed by living in high-poverty neighborhoods. Residents of high-poverty neighborhoods have poorer health outcomes and self-rated health than those in low-poverty neighborhoods.[24] Neighborhood poverty during childhood also negatively impacts high school graduation rates and annual earnings.[25] Children who moved to lower-poverty neighborhoods when they were young experienced improved college attendance rates and earnings, were more likely to live in better neighborhoods as adults, and were less likely to become single parents.[26] Growing up in a high-poverty neighborhood can even inhibit self-control.[27]

TDHCA and the State should consider, in line with ICP's recommendations, eliminating local municipalities' ability to circumvent or waive policies meant to prevent overconcentration of HTC properties.

*Failure to include older properties when considering housing choice*

TDHCA fails to include HTC applications from before 2018 in their analysis of application location in the "Housing Program and Portfolio Analysis" section of the draft AI.[28] Data that

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[23] US Department of Housing and Urban Development. (April 7, 2015). *Effect of QAP Incentives on the Location of LIHTC Properties. Office of Policy Development and Research*. https://www.novoco.com/sites/default/files/atoms/files/pdr_qap_incentive_location_lihtc_properties_050615.pdf

[24] Yang, Tse-Chuan, and Scott J. South. (August 2020). "Neighborhood Poverty and Physical Health at Midlife: The Role of Life-Course Exposure." *Journal of Urban Health*. 97(4), pp. 486–501. https://doi.org/10.1007/s11524-020-00444-8

[25] Galster, George, et al. (September 2007). "The Influence of Neighborhood Poverty During Childhood on Fertility, Education, and Earnings Outcomes." *Housing Studies*. 22(5), pp. 723–51. https://doi.org/10.1080/02673030701474669

[26] Chetty, R., Hendren, N., & Katz, L. (2016). "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Project." *American Economic Review*, 106(4). https://scholar.harvard.edu/hendren/publications/effects-exposure-better-neighborhoods-children-new-evidence-moving-opportunity

[27] Tomlinson, Rachel C., et al. (April 2020). "Neighborhood Poverty Predicts Altered Neural and Behavioral Response Inhibition." *NeuroImage*. 209, 116536. https://doi.org/10.1016/j.neuroimage.2020.116536

[28] TDHCA should note in their analysis of HTC applications exactly which properties or applications were included. If the sample includes all applications, it is not possible that just one property received a letter of opposition. Applications that received letters of opposition (none of which received awards, but all of which are listed in Application Logs on TDHCA's website) include:
2018: App 18218, Cypress Creek Apartment Homes at Woodedge Park (Houston)

reflect the full portfolio of TDHCA properties show the full array of housing choices for HTC tenants, which is central to identifying impediments to fair housing choice. TDHCA states that this exclusion was purposeful as they "cannot fundamentally alter where LIHTC units have been situated in the past." It is true that more recent HTC cycles in Texas have improved in awarding developments in lower-poverty areas, but long-term, ongoing concentration is still a concern that must be discussed.

As we stated in our preliminary comments, focusing on recent patterns ignores the fact that most HTC units in Texas are still in tracts with lower incomes and fewer white residents. A review of the 2022 Housing Sponsor Report shows that the share of Black/African American HTC residents that live in low income, majority non-white census tracts is larger than those of other racial and ethnic groups.[29] The fact that Black or African American residents and those with incomes at or below 30% AMI are more often in lower-quality tracts raises concerns that these residents are benefitting less from recent improvements to HTC awards than other tenants.

This is a particular concern when so many older HTC properties go through resyndication, and many more properties are in need of rehabilitation work. The AI's discussion of the need to balance actions between development of new housing in high opportunity areas and rehabilitation of older properties that tend to be in lower income communities of color is related to this issue. TDHCA should seek an understanding of rehabilitation needs within TDHCA's portfolio and how tenants are impacted.

**The AI fails to adequately address the issue of exposure to hazards.** The AI does not address the impediment of environmental hazards that disproportionately impact members of protected classes and does not include recommendations to reduce hazard risk.

As noted in ICP's preliminary comments, there is a high correlation between racial segregation and adverse environmental risks posed by industrial uses.[30] HTC tenants are more likely to live in neighborhoods of color, and are thus disproportionately exposed to environmental harms, industrial pollution, and risks to health and safety. We support the Legal Defense Fund in calling for stricter requirements to reduce the exposure of HTC tenants to environmental hazards such as increasing the required distance from a solid waste facility, sanitary landfill facility, waste transfer station, or illegal dumping site.

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2021: App 21016, Houston Willow Chase Living (Houston); App 21139, Cypress Creek Apartment Homes at Forest Lane (Dallas); App 21144, Mariposa Apartment Homes at Plano Parkway (Plano)
2022: App 22321, Autumn Pointe Apartments (Laredo - withdrawn)

[29] Texas Housers. (2023, December). *How to Improve Housing Tax Credits for Low Income Texans: 2024 QAP Report.* https://texashousers.org/wp-content/uploads/2023/12/How-to-Improve-Housing-Tax-Credits-for-Low-Income-Texans-2024-QAP-Report.pdf p. 27-8

[30] Patnaik, A., Son, J., Feng, A., & Ade, C. (2020, August 15). Racial Disparities and Climate Change. *Princeton Student Climate Initiative.* https://psci.princeton.edu/tips/2020/8/15/racial-disparities-and-climate-change

The majority of low-income community members Texas Housers spoke to in preparing to respond to the AI did not feel prepared or have access to resources or finances in case of a disaster or emergency. The AI should do more to address the vulnerability of low income Texans who are members of protected classes to harm from disasters. In the past, Texas Housers has suggested increasing elevation requirements for HTC properties in floodplains to align with other state and federal standards. This helps reduce flood risk, which can compound environmental hazards such as polluting industry sites that can spread hazardous materials in the case of a flood.[31] This is a simple action within TDHCA's authority that would benefit HTC tenants who are disproportionately members of protected classes.

## FIVE: The AI fails to properly address Housing Choice Voucher (HCV) discrimination.

**The Chapter 4 review of state-level laws does not mention 84R SB 267, which bans local governments from establishing ordinances that protect HCV holders from rental housing discrimination**.[32] The state preemption ban on source of income protection and the state legalization of landlord discrimination against voucher holders is an impediment to fair housing choice and reduces voucher holders' access to exclusionary and high opportunity areas and communities. Voucher holders and Texans eligible for vouchers are disproportionately represented among members of protected classes. While 16% of white, not Hispanic or Latino renter households are Extremely Low Income (ELI, making at or below 30% AMI), 26% of Black, Not Hispanic or Latino and 25% of Hispanic renter households are ELI. About a third of households with at least one member with a disability and about a quarter of households with at least one child are ELI.[33] As pointed out by Disability Rights Texas, the field preemption bill also prevents cities from enacting local protections for people who depend on disability-related income like social security.

The recent Providence Village Homeowners Association (HOA) discrimination issue in Denton County is just the latest illustration of the lengths that exclusionary communities and individuals will go to to keep low-income voucher holders out of their communities and to hoard opportunity.[34] A discussion of state legislation disallowing local source of income protection ordinances must be included in Chapter 4 of the AI.

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[31] Marlow, T., Elliott, J. R., & Frickel, S. (2022). Future flooding increases unequal exposure risks to relic industrial pollution. *Environmental Research Letters*, 17(7), 074021. https://doi.org/10.1088/1748-9326/ac78f7

[32] TX Legislature 84(R). (2015). SB 267. https://capitol.texas.gov/BillLookup/history.aspx?LegSess=84R&Bill=SB267

[33] US Department of Housing and Urban Development. (2023, September 5). 2016-2020 Comprehensive Housing Affordability Strategy; Tables 1, 6, 7, 9, and 13. https://www.huduser.gov/portal/datasets/cp.html#data_2006-2020

[34] Fechter, J. (2023, July 7). Texas bans homeowners' associations from discriminating against renters who receive federal housing aid. *Texas Tribune*. https://www.texastribune.org/2023/07/07/texas-hoas-housing-section-8/

**The draft does not include recommendations that state-level actors can take to expand voucher access in high opportunity, exclusionary areas**. While the state agencies involved in drafting the AI may not have direct decision making power over actions by PHAs, individual state agencies and the state government as a whole must lead the development of a statewide vision for fair housing by leading, coordinating, convening, researching, educating, and training.

Potential recommendations include:
- Exploring programmatic and policy support for incentivization of landlord participation in voucher programs,
- Strengthening affirmative marketing requirements and ensuring that properties in TDHCA's multifamily portfolio are working proactively with Public Housing Authorities (PHAs) to connect voucher holders with units at these properties, which must accept vouchers, and
- Reducing voucher turnback rates by working with and providing support and coordination for Public Housing Authorities across the state to ensure that voucher holders are being assisted in every way possible in successfully securing a unit that accepts their voucher.

The AI should recommend that TDHCA publish their annual SAFMR analysis to show that they are using the higher of FMR and SAFMR and better inform the public about the difference between FMR and SAFMR. While Texas Housers was able to find a PDF comparing payment standards in areas where TDHCA administers vouchers, it is unclear how to access this information via TDHCA's new website (we found it through Google) and the information is not presented in a useful format.[35] TDHCA should publish either a spreadsheet version or take the step of mapping out differences. The current format is useful for someone looking up payment standards in a single area, but is not conducive to larger analysis or high level review.

## SIX: The AI fails to adequately address the impediment of eviction.

**Evictions did not stop being an issue because the pandemic ended.** Eviction filing rates have increased in Texas cities since the end of the pandemic. In places like Harris and Tarrant Counties they have increased well beyond pre-pandemic levels.[36] Research shows that evictions are more likely to be filed against Black and Hispanic or Latino renters and women, even at a single property.[37] TDHCA provides ample evidence in their discussion of pandemic response programs that eviction is a fair housing issue and that eviction prevention or diversion affirmatively furthers fair housing. Eviction is explicitly mentioned as a barrier to protected classes that may limit mobility and housing choice. But evictions are not mentioned once in

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[35] Texas Department of Housing and Community Affairs. (2023). *2023 HCV Payment Standards.* https://www.tdhca.state.tx.us/section-8/docs/23-HCV-PaymentStandards.pdf

[36] Eviction lab. (2024). Eviction Tracking: Houston, Texas. Princeton University. https://evictionlab.org/eviction-tracking/houston-tx/
Eviction lab. (2024). Eviction Tracking: Fort Worth, Texas. Princeton University. https://evictionlab.org/eviction-tracking/fort-worth-tx/

[37] Hepburn, P., Louis, R., & Desmond, M. (2020). Racial and Gender Disparities among Evicted Americans. *Sociological Science*, *7*, 649–662. https://doi.org/10.15195/v7.a27

Chapter 11, the chapter that identifies the official impediments to fair housing choice. Even with the end of the Texas Rent Relief program, TDHCA programs still intersect with eviction issues, and TDHCA has the authority to impact evictions at properties they fund and monitor.

**The draft 2024 AI does not mention 88R HB 2127 from the most recent legislative session, the "field preemption" bill, which impacts evictions.**[38] This bill explicitly preempts cities from enacting their own eviction protection measures such as an "opportunity to cure" period. Preempting local eviction prevention measures and tenant protections disproportionately impacts people of color, women, people with disabilities, and other protected groups. This is a glaring absence from Chapter 4 (review of state level laws, regulations, and programs). Both Disability Rights Texas and Texas Housers pointed to the fair housing issues that this bill will cause in preliminary comments, yet it was not mentioned as a relevant law. Eviction disproportionately impacts members of protected classes, particularly people of color.

**The 2024 AI does not include recommendations relating to eviction.** Research has shown that HTC tenants may experience greater risk of eviction.[39]

The AI should include a recommendation that TDHCA implement policies to lower the risk of eviction at properties in TDHCA's rental portfolio. Having a rule devoted to what must be included in a notice to vacate or non-renewal is not sufficient, and does not represent the fullest extent of what TDHCA has the authority to do. In the past, Texas Housers has recommended that TDHCA incentivize eviction prevention plans as a resident service in the QAP. As noted by Disability Rights Texas, case workers and service navigators can be an important tool in maintaining housing stability for tenants with disabilities. TDHCA could also make 30 day notices a base requirement and disallow 3-day notices.

TDHCA should also note in the impediments and recommendations sections that the preemption of local eviction prevention and tenant protection ordinances is a barrier to fair housing, and that if it is not repealed, the state needs to ensure there are meaningful protections statewide.

## SEVEN: The AI must acknowledge the widespread need for units affordable to extremely low income Texans.

**The AI's impediments only highlight the need for ELI units for people with disabilities.** People with disabilities are not the only members of protected classes that disproportionately need units affordable to ELI households. As noted in our preliminary comments, Black and Hispanic Texans are disproportionately lower-income compared to white Texans. According to

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[38] TX Legislature 88(R). (2015). HB 2127.
https://capitol.texas.gov/BillLookup/history.aspx?LegSess=88R&Bill=HB2127

[39] Texas Housers. (2023, December). *How to Improve Housing Tax Credits for Low Income Texans: 2024 QAP Report*.
https://texashousers.org/wp-content/uploads/2023/12/How-to-Improve-Housing-Tax-Credits-for-Low-Income-Texans-2024-QAP-Report.pdf p. 30-1

the 2023 State of Texas Low Income Housing Plan 13% of Texas' white population is in poverty, compared to 18.7% of Black or African American Texans. 18.3% of Hispanic or Latino Texans are in poverty, compared to 11.6% of non-Hispanic or Latino Texans.[40] 44% of white renters in Texas are housing cost burdened, paying more than 30% of their income toward rent, compared to 55% of Black Texans and 51% of Hispanic or Latino Texans.[41]

Racial and ethnic minorities, and other protected classes such as people with disabilities, are overrepresented among Texans with the lowest incomes. The AI must include continued and expanded action by TDHCA and other agencies to substantially prioritize the provision of lowest income housing to reach Extremely Low-Income and Very Low-Income households in the state.

**The AI must do more to explore housing needs for extremely low income Texans in the HTC program**. HTC is the largest source of subsidized units meant to help low income people, and the greatest need is for ELI households. The AI fails to adequately address this issue and the HTC program fails to address this problem better than the housing market overall. This is a major fair housing concern, considering the disproportionate representation of members of protected classes in ELI households.

The AI's discussion of HTC Income Categories mentions that 21.5% of TX renter households are ELI, but only 4.2% of HTC program-assisted units are set aside for households within this AMFI category (p. 182).[42] This datapoint is in line with the findings of NLIHC's Gap Report, which found that Texas has just 25 affordable and available homes per 100 ELI households.[43] The number is even lower for major metropolitan areas: 21 affordable and available units in Austin, 17 in Dallas, and just 15 in Houston per 100 ELI households.

In discussing statewide demographics and economic conditions, TDHCA mentions the need for extremely low income units but fails to take the extra step of demonstrating that need with readily available data. The AI mentions how many households are at various income levels without noting how many units are affordable and available to them, which, if included, would indicate that housing need is greatest for ELI households. NLIHC's Gap Report should absolutely be referenced here, and the general lack of units for ELI households in Texas needs to be highlighted.

When discussing the agency's own tenant data, TDHCA mentions that HTC households often occupy units at a higher rent level than they could qualify for, resulting in higher housing cost burden. But the AI fails to present tenant income data that TDHCA collects in such a way to further explore this issue. Better understanding of this issue could help clarify how TDHCA

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[40] Texas Department of Housing and Community Affairs. (2023). *2023 State of Texas Low Income Housing Plan and Annual Report*. https://www.tdhca.state.tx.us/housing-center/docs/23-SLIHP.pdf, p. 18-9

[41] PolicyLink and USC Equity Research Institute. (2023). *National Equity Atlas*. https://nationalequityatlas.org/indicators/Housing_burden?geo=02000000000048000

[42] The same page states that "In active TDHCA-monitored HTC properties in Texas, only 1.4% of units are set aside for 80% AMI or less." This is likely meant to be "greater than 80% AMI".

[43] National Low Income Housing Coalition. (2024). *The Gap: Texas*. https://nlihc.org/gap/state/tx

serves ELI Texans and identify areas for improvement. Instead, the AI features a lengthy discussion about the difficulties funding ELI units and compares HTC units to total renter households in the state.

TDHCA should include a comparison of HTC unit rents and tenant incomes similar to Table 15C of HUD's Comprehensive Housing Affordability Strategy (CHAS) dataset. TDHCA could take this one step further and look at how the use of further rental subsidies might impact what unit a tenant qualifies for and eventually inhabits. Or, take the step of making anonymous, usable data available for the public to analyze. TDHCA should create a dataset like CHAS' Table 15C with property as the unit of observation. TDHCA should also include the discussion of difficulty funding ELI units as an impediment to fair housing choice.

**The AI should include recommendations to increase state funding for deeply affordable housing to better meet the housing needs of members of protected classes.** Protected classes are disproportionately represented among the lowest-income levels that require subsidy in order to achieve housing affordability, and this lack of funding is an impediment to fair housing choice.

As noted in our preliminary comments, 72% of state and federal funds administered by TDHCA accounting for over $1.8 billion go toward homeownership programs largely targeted to households making up to 115% of AMI, higher than the extremely low-incomes and very low-incomes where there is the greatest need and where Black and Hispanic or Latino households are overrepresented.[44] The State needs to step up and provide more funding to target lower income households.

The State of Texas provides virtually no state funds for low-income rental housing and extremely low-income housing. Black and Hispanic or Latino households are overrepresented in these categories, as are other protected classes such as people with disabilities. The State of Texas must immediately and dramatically expand funding for low-income rental housing and housing for Texans with extremely low-incomes and very low-incomes.

Two avenues for this that should be included in the AI recommendations are:

- Expanding the state Housing Trust Fund and expanding the use of these funds to include rental housing for those with extremely low-incomes and very low-incomes; and
- Expanding the State Housing Tax Credit while maintaining a focus on funding additional units for ELI households.

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[44] Texas Department of Housing and Community Affairs. (2023). *2023 State of Texas Low Income Housing Plan and Annual Report*. https://www.tdhca.state.tx.us/housing-center/docs/23-SLIHP.pdf, p. 50

EIGHT: The AI's discussion of how NIMBYism creates an impediment through land use restrictions fails to address nuance about the extent to which deregulation alone can directly remedy the impediment for protected classes.

**The AI should include a more thorough discussion of this issue in order to better inform state level decision making from a fair housing perspective.** The AI discusses how land use can be an impediment to fair housing choice by "limit[ing] the creation of affordable housing stock in diverse areas," but does not provide the full context necessary to understand the impact and limitations of land use deregulation in addressing housing exclusion for protected classes. The draft does not make any recommendation on that issue, despite Texas lawmakers expressing interest in state-level zoning regulation.[45]

The AI fails to mention that Black, Hispanic, and indigenous households, people with disabilities, and other protected classes are concentrated among lowest-income populations where market reforms alone will not likely produce affordable housing and where subsidy is needed.[46] There are some specific cases where changes to land use regulation will provide more direct benefits to members of protected classes, such as preventing zoning that blocks group homes to benefit persons with disabilities, but land use deregulation should not be considered as a standalone tool, universally beneficial and effective for addressing neighborhood exclusion. The AI should explicitly acknowledge that zoning reform alone will not desegregate exclusionary communities or provide meaningful affordable housing opportunities for extremely low income households where protected classes are disproportionately represented.

The AI should explicitly state that changes to zoning would have no impact on restrictive covenants. This is a clear impediment to fair housing choice that would prevent blanket zoning regulation from having an impact in high opportunity neighborhoods with exclusionary covenants that use these mechanisms to segregate themselves from lower income people, who are disproportionately members of protected classes.

The language flips between being focused on single family housing (e.g., "the only housing units that could be built within those limitations are houses on large lots with large room sizes that lower income families may not be able to afford.") and multifamily housing (e.g., "Broad-based opposition to affordable housing may be expressed in terms of concerns over crime, property

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[45] Fechter, Joshua. (2024, March 27). Republicans' budding interest in Texas' housing crisis could create strange political bedfellows. *The Texas Tribune.*
https://www.texastribune.org/2024/03/27/texas-republicans-housing-affordability-zoning-land-use/

[46] McCue, Daniel. (2023, July 27). Housing Markets Leaving Lowest Income Households Behind. *Housing Perspectives*.
https://www.jchs.harvard.edu/blog/housing-markets-leaving-lowest-income-households-behind
Freemark, Yonah. (2024, April 8). *No Single Policy Will Increase Housing Affordability. We Need a Comprehensive Strategy*. Urban Institute.
https://www.urban.org/urban-wire/no-single-policy-will-increase-housing-affordability-we-need-comprehensive-strategy

values, school overcrowding, and traffic.") without distinguishing that there's any kind of difference. Changes to land use regulations to add gentle density to single-family neighborhoods will not, for example, help increase the production of HTC properties in high opportunity areas, but reform to allow multifamily housing by right in exclusionary neighborhoods might.

Overall, increasing land zoned for multifamily housing is likely to have a more direct impact on expanding opportunity to lower income households than gentle density and small changes to single family zoned communities, and this must be discussed in the draft AI. However, the discussion must also note that no amount of land use deregulation is likely to make housing affordable to lowest income households where members of protected classes are disproportionately represented, and that deregulation may undercut programs that secure affordability through zoning variances and waivers.

## NINE: We support the recommendation to research and assess the use of criminal background screenings and encourage TDHCA to act on removing unnecessary screening criteria.

**As stated in our preliminary comments, screening criteria requirements at supportive housing developments create barriers for the very people meant to benefit from supportive housing and can ultimately have a discriminatory effect on the basis of race.**[47] The current QAP goes beyond the Tenant Selection Criteria requirements in 10 TAC §10.802 to the detriment of tenants targeted for assistance and protected classes.

Formerly incarcerated people are more than 10 times more likely to be unhoused than the general public.[48] Persons experiencing and at-risk of experiencing homelessness are targeted populations for Supportive Housing under the QAP, and multiple provisions in the QAP incentivize providing housing for this population. Further, Black Texans constitute 13% of state residents, but 27% of people in jail and 33% of people in prison.[49] We support our partners in highlighting the disparate impact of criminal screenings and the need to evaluate and limit their use at TDHCA funded and monitored properties.

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[47] Rosie Truelove. (2022, March 28). *Response to Resolution No. 20200611-094: Tenant selection policies and procedures for individuals with prior convictions or evictions*. https://services.austintexas.gov/edims/document.cfm?id=379792
Kanovsky, H. R. (2016). *Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions*. U.S. Department of Housing and Urban Development. https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF
[48] Bae, John. (April 2023). *Opening Doors to Affordable Housing: The Low-Income Housing Tax Credit Program and People with Conviction Histories*. Vera Institute of Justice. https://www.vera.org/downloads/publications/Opening-Doors-to-Affordable-Housing-Report.pdf
[49] Vera Institute for Justice. (2018). *Incarceration Trends in Texas*. https://www.vera.org/downloads/pdfdownloads/state-incarceration-trends-texas.pdf

Staff comments included in the draft indicate that staff believes that removing lookback periods would enable NIMBYs to block affordable housing development, reducing fair housing choice.[50] TDHCA identified NIMBYism as their #1 impediment and directly stated that when decisions "...are made that are responsive to local opposition and NIMBYism, they may perpetuate or support the NIMBYism effect and limit the creation of affordable housing stock in diverse areas" (p. 246). Yet staff comments indicate that they themselves are not willing to upset NIMBYs even if it means helping individuals with criminal histories, who are disproportionately members of protected classes. This is a failure to affirmatively further fair housing.

**TDHCA may want to consider evaluating other screening criteria that create barriers to members of protected classes, such as eviction record screening, especially when redeveloping public housing properties.** If TDHCA funds are used to redevelop public housing properties, such as through the RAD program, it is especially important that new owners do not include additional restrictions that might prevent public housing residents from returning to their unit once work is complete. This helps address potential displacement of members of protected classes.

## TEN: The AI fails to identify Texas laws that are impediments to fair housing choice.

As mentioned elsewhere, the AI fails to mention the recent field preemption bill and the ban on local ordinances that protect HCV holders from rental housing discrimination. In addition, the AI does not include any discussion of the ban on linkage fees or the ban on inclusionary zoning as a relevant state law or impediment to fair housing choice.

## ELEVEN: The AI fails to acknowledge noteworthy barriers to accessing homeownership.

Governor Abbott has recently turned attention to the issue of institutional ownership of single family homes crowding out family buyers.[51] Institutional owners tend to target low income communities of color for purchases and block out members of protected classes from homeownership, driving racial gaps in homeownership and wealth creation.[52] Proximity to

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[50] Texas Department of Housing and Community Affairs. (2024, April 3). Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice. https://www.tdhca.texas.gov/sites/default/files/fair-housing/docs/24-Tx-AI-Draft.pdf Appendix G, p. 484

[51] Fechter, Joshua. (2024, March 15). Gov. Greg Abbott wants the Texas Legislature to rein in investors behind large-scale home purchases. The Texas Tribune. https://www.texastribune.org/2024/03/15/texas-greg-abbott-institutional-homebuyers/

[52] Seymour, E., & Shelton, T. (2023). How Private Equity Landlords Prey on Working-Class Communities of Color. *New Labor Forum*, 32(2), 54–63. https://doi.org/10.1177/10957960231170168

Bologna, Giacomo. (2022, October 28). Outside investors are buying up homes in Baltimore's low-income and Black neighborhoods. *The Baltimore Sun.* https://www.baltimoresun.com/2022/10/28/outside-investors-are-buying-up-homes-in-baltimores-low-income-and-black-neighborhoods/

investor-owned homes was found to decrease home value (especially in Black neighborhoods), increase crime, decrease local construction and repair, increase nuisance code violations (e.g., trash and grass), and decrease the number of registered voters.[53]

This is a particular concern in Texas, where 28% of all Texas homes purchased in 2021 were bought by institutional buyers.[54] This was the largest share among all states and the nationwide rate was 15%. Certain counties had rates over 40% (Tarrant, Rockwall, Midland, Dallas, and Travis).

To address these impediments, TDHCA should recommend a request for additional funding for gap funding for low income first time homebuyers, as well as staff to provide technical support and outreach to help low-income households achieve the dream of homeownership.

## TWELVE: The AI should incorporate TOP's Four Rights of Fair Housing.

The Texas Organizing Project ("TOP") has identified Four Rights of Fair Housing. According to TOP's model, which Texas Housers endorses, every Texan should have:

- The right to choose where they live, in a decent and affordable home, regardless of their race, color, national origin, sex, religion, familial status, or whether they have a disability;
- The right to stay in their neighborhood and enjoy improving conditions without fear of being involuntarily displaced by gentrification;
- The right to equal treatment by their government and private institutions; and
- The right to have a say in government policies that impact them, their homes, and their neighborhoods.

The 2024 AI should adopt these Four Rights as guiding principles and use them as a standard to measure impediments and actions against. An AI that uses the Four Rights as benchmarks will be well on its way to meaningfully considering impediments to fair housing choice.

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Linares, Albinson. (2024, January 2). Wall Street's growing housing stock prices out Latino renters, buyers. *NBC News*. https://www.nbcnews.com/news/latino/wall-streets-housing-stock-leaves-latinos-struggling-buy-rent-homes-rcna131917

Hernández, Arelis R. (2022, June 19). Modern 'redlining' is pushing some Texans out of their homes. *Washington Post.* https://www.washingtonpost.com/nation/2022/06/19/texas-housing-crisis/

[53] Billings, S. and Soliman, A. (2023, December 18). Corporate landlords are eroding the American Dream of homeownership, especially in Black neighborhoods. London School of Economics. http://eprints.lse.ac.uk/121219/1/usappblog_2023_12_18_corporate_landlords_are_eroding_the_american_dream_of_homeownership_especially_in_black_neighborhoods.pdf

[54] National Association of Realtors. (2022, May). *Impact of Institutional Buyers on Home Sales and Single-Family Rentals*. https://cdn.nar.realtor/sites/default/files/documents/2022-impact-of-institutional-buyers-on-home-sales-and-single-family-rentals-05-12-2022.pdf

## THIRTEEN: We support TDHCA's recommendation to consider gentrification and displacement in awarding HTC properties, but we are concerned about implementation.

TDHCA's recommendation to consider displacement could help address our concerns about the need to balance new development in high opportunity areas and preservation in low income areas. However, we have slight concerns about the logistics of measuring displacement. The time between the collection of data indicating gentrification is occurring and the opening of a property to tenants might make this difficult, as data lags the real world. Further, Texas Housers is interested in better understanding how TDHCA might measure gentrification. For example, the State might consider borrowing the methodology of the Uprooted report in Austin.[55]

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[55] Way, H., Mueller, E., & Wegmann, J. (2018). *Uprooted: Residential Displacement in Austin's Gentrifying Neighborhoods and What Can Be Done About It*. University of Texas at Austin. https://sites.utexas.edu/gentrificationproject/..austin-uprooted-report-maps/

**Nathan Darus**

| | |
|---|---|
| **From:** | Chanttani Schrock <chanttani@rocketmail.com> |
| **Sent:** | Tuesday, April 30, 2024 12:06 AM |
| **To:** | Fair Housing |
| **Subject:** | Addressing the Crisis! Texas' Affordable Housing Shortage Demands Action" |

Dear TDHCA,

My name is Chanttani Schrock, and I am a Housing Choice Voucher/FSS participant advocating for fair housing policies that benefit low-income families in Texas. I am deeply concerned about the current differences in housing opportunities and believe that addressing these issues is essential for creating a more equitable society.

The state of Texas has not done enough to provide affordable housing in well-resourced areas and without affordable options there, it keeps low-income families separated making it harder for us to access good housing, education, and jobs. This failure to deconcentrate poverty undermines the principles of fair housing and perpetuates systemic inequalities.

Affordable housing is important to me because living in a well-resourced area has allowed my family access to better schools, healthier food options, a more diverse community, stability in employment, and a network of diverse friends who are achieving economic success. It has allowed us the opportunity to see and learn what they are doing to work toward the same success. My daughter visits friends' homes in the neighborhood and is able to see the careers of other parents and expand her horizons. Living in this community has allowed me to see how homeowners maintain their homes and the community and has taught me, as a rent how to maintain my rental so that I am equipped to handle a home of my own. By investing in affordable housing initiatives in high-opportunity areas, we can provide low-income families with the resources and support they need to thrive.

As a voucher holder, I have personally experienced the challenges of finding safe and affordable housing in well-resourced areas. In 2023, during my search for a new home, I was denied an apartment in Little Elm, TX after being manually approved right before moving in and 3 weeks before moving my daughter to college in Virginia, despite having good credit, great rental history, and stable employment of 5 years. The reason I was provided was that my portion of the rent was $1152 and not $0. However, I was informed that if the housing authority paid the entire amount of rent including my 30-40%, I would then qualify. We see policies and other legal discrimination like this throughout our search for affordable homes. This leaves us feeling discouraged and as if there is no way out of the poverty gap. By pushing for more affordable housing in better areas, it gives families like mine better chances to succeed and move up.

I urge TDHCA to prioritize developing tax credit properties in well-resourced areas and implementing strategies to deconcentrate poverty. Investing in affordable housing in high-opportunity areas creates more equitable communities and helps low-income families thrive.
Thank you for your attention to this important matter. I look forward to seeing positive action taken to address these critical housing issues and promote fair housing opportunities for all residents of our state.

Chanttani Schrock
Mobile: 682-200-9451
chanttani@rocketmail.com

*"Speak up for those who cannot speak for themselves, for the rights of all who are destitute. Speak up and judge fairly; defend the rights of the poor."*

*Proverbs 31:8-9NIV*

| | |
|---|---|
| **From:** | Sharon Underwood <tenantadvocatetexas@gmail.com> |
| **Sent:** | Thursday, May 2, 2024 2:25 PM |
| **To:** | Fair Housing |
| **Subject:** | Analysis of Improvement Comments |

# Impediment: Not in my backyard (NIMBY)

NIMBYism is a true deterrent of housing choice, impedes on the fair housing rights and discriminates against families, the disabled, and people of color, who are all often low-income and need affordable housing in order to live in a desired area.

# Recommendations:

I. Proactive education about the housing needs of an area in order to affirmatively further fair housing is necessary to ensure that elected officials and the public alike are making informed decisions and not swayed but uneducated rhetoric or inflammatory remarks that are often unsupported by data. Meet with elected officials (the people residents go to to oppose the building of low income housing in their neighborhood,) to educate them, show them how low income properties would benefit the neighborhoods in which their constituents live and affirmatively further fair housing in order to provide adequate resources for protected classes. Residents feel affordable housing would drive down their home values, increase crime and affect schools.

"In reality, the lack of safe, affordable housing is costing U.S. cities in several dramatic ways. Cities that fail to step up with affordable housing solutions drive out residents, lose potential workers, and

discourage growth in their local economies. While those who already have safe and stable housing may not feel the true cost of poverty, the effects are real and can have a serious detriment on our communities. High housing prices can slow down a local economy, leaving jobs unfilled and less spending power in a community. But, when affordable housing is readily available, more opportunities become available for people at all income levels. More money is available for spending in a community, and long-term change can begin to take root." https://commonbond.org/economic-benefits-of-affordable-housing/

II.   Perhaps TDHCA could include more about the benefits of affordable housing on their website, including data such as but not limited to (a) renter populations and the distribution of renter households across the state based on race, socioeconomic, and familial status; (b) the distribution, classification, and affordability breakdown of existing LIHTC developments; (c) the affordability terms and the end date of the compliance period, and (d) the conditions of the property, such as the last 5 REAC scores.

Thank you for the opportunity to comment.

Sharon Underwood

Tenant Advocate

Member: Texas Tenants' Union

2022 Texas Houser Fellow

Member: Texas Organizing Project (TOP)

(346) 704-0986

| | |
|---|---|
| **From:** | Bernistine Williams <blrosswilliams@gmail.com> |
| **Sent:** | Thursday, May 2, 2024 7:42 PM |
| **To:** | NGardner@inclusivecommunities.net; slawrence@inclusivecommunities.net; Fair Housing |
| **Subject:** | Fwd: Fw: Take Action for Fair Housing: Support Affordable Housing in High Opportunity Areas |
| **Attachments:** | Letter Writing Framework for TDHCA Public Comments (1).docx |

You don't often get email from blrosswilliams@gmail.com. Learn why this is important

Dear TDHCA;

My name is Bernistine Williams. I live in McKinney, Texas in an affordable housing tax credit property in what DHA Housing Sollutions of North Texas has designated as a high-opportunity area.

**I am deeply concerned with disparate housing opportunities and constantly moving at the whims of others and never able to get rooted and grounded anywhere**.
I am a Walker Settlement Permit holder and moving to this area was out of necessity. There were no other places to choose from in Plano available at the time where I was living and would have preferred to stay in that city. I was forced to move due to the great influx of Californians who were able to buy any and all available rentals. In addition, this great migration also drove up the cost of rents. My landlords raised rent immediately and gave me a move out date. I improved my position in life with my children living in this city for 13 years. I had not live in an "apartment" since 1978, so to have to move out of a house to an apartment proved to be very challenging. Well-being versus well-resourced areas - not a much talked about subject. But the opportunities and possibility for upward mobility for low income families exist. It can possibly break the cycle of poverty and promote economic integration. This is more so contingent on the individual and their mind set. But investment in **permanent** affordable housing initiatives is critical for low income families to thrive if this investment is indeed geared towards upward mobility.

**Recruiting and retaining property owners in less concentrated areas to expand housing choice seem to be a design to keep the rich getting richer**. They don't care if we live or die. We need to get to a new way of thinking and allowing this payment from the voucher to benefit more economicall y for the person who has the voucher. This safe, affordable place to live in "well-off areas" concept worked for me and my six children. They are all free from the systematic poverty mechanism that can perpetrate itself over and over again. The key was rent assistance to be able to live in the home of choice - away from less equitable communities where the resources are available but concentrated needs overwhelm those areas, so myself and my children had a better opportunity to access the resources to keep us going upward with the intent of never going backwards. The jobs were available, good schools were accessible but there were instances of disparity and inequality. This still exist historically and presently as a long standing denial to decent safe and affordable housing and segregtion moreso than anything else.

**This program provides no good end result in any balanced living patterns**. The problem now as then is the equity side of upward mobility. I believe we are wasting time and money attempting to "fit in." We need to get past that old pattern of trying to **move** racially and ethnically concentrated areas of poverty into areas of opportunity. It didn't work in the past. It will not work now. Re-inventing the wheel has kept us in this pattern of "attempting to achieve" improved fair housing outcomes. THIS IS TEXAS! Fair housing outcomes happens when the planning process involves participants. Not people sitting behind desk. Discrimination is still a major problem in this republic. North Texas has been very challenging even for me. It exist in more than one area of

life of a person of color. and it can be time consuming attempting to fix and address these areas with much success but the single most critical event that has happened in which I knew would be **a long term slide backward was the legalization of** i**ncome discrimination** which gives Texas the green light to continue its pursuit to "keep segregation" alive and well in this Confederacy. I don't think this approach of "forcing" housing choice in "their".communities, but the only way we as low income and / or minority households can be able to overcome this on-going impediment to housing choice - there has to come significant change which will require a new process of "desegregating" communities and that's bring a lot of good minds to the table.

**The areas of the Department's jurisdiction where there are concentrations of low income and / or minority households** - for some - these are places where some feel comfortable and they do not want to leave those areas. They have great familial support systems, friends and places that they are in sync with and isolation is not their choice. In these well-resourced areas - being able to get from point A to B even, it makes sense to me that they prefer to be where public transportation is available. We must remember that public transportation is not in these suburbs in order to keep out low income / minority people. This reason for remaining in high concentrated poverty areas has been voiced by many when I was on the Resident Council Boards at DHA Housing Solutins of North Texas in addition to all neighborhood conveniences they were used to. Everyone with a HCV don't want to be around people that hate them and don't want them in their neighborhoods. It's hard burden to bear. It's an uncomfortable feeling but my goal was to get to a better place in life. The sacrifice is great.

**One key thing is we need to stop using the phrase Section 8!** It would be helpful to go forward with using **HOUSING CHOICE VOUCHER as representation AND TOTALLY ELIMINATE THE DESIGNATION OF the term "SECTION 8**." to change the face of "fair housing." I am not asking for more tax credit properties in well resourced areas.☺️🤪 Section 8 is repugnant to many and we should not use this term in any parts of housing reform.Millennium Apartment Homes is a highly undesirable property for McKinney. We live in the middle of very nice apartments on a main artery but at any given time there is trash, unkept grounds, exposed sprinkler system, no attractive ground cover, the halls are filthy, the walls in the halls are filthy, continuous AC issues, mold (where I have been negatively affected per professional reports) and it has been referred to as "that Section 8 property" by many. (They didn't know I was a resident.) I've had my City Council Rep to come and see this complex. He wrote it off to "housekeeping" but visible dirt on the walls with mold behind sheetrock? So even the expectation of the Council person on target: This is what the low income / minority people deserve. He said in a meeting "If you have no skin in the game...you should not say anything." I thought he had lost his mind. I checked him at the next meeting. But this the normal mind set about poverty and Section 8.

**Inclusive communities and community development should be interchangeable terms**. The money is there for payment. But we, the participant can't access the units where I / they would prefer to live. There are apartments going up all around this city. No apartment builders nor home builder who gets city incentives in the form of bond money, tax credits gifts, whatever should be able to deny a voucher holder in this city or any city to rent and live a life where they are comfortable and not subjected to these slum lord establishments. Again, this systematic segregation, maybe in unawares, but it is in your face. This would decentralize poverty with X amount of units in every new development be allocated to a HCV holder. It's a discreet way of fixing the affordable home shortage that exist for voucher holders and families would do better when concentrated poverty communities (tax credit properties) will become a thing of the past. It don't take a genius.

**Equity, once again, has to be all inclusive,** in both senses: economically and accountability wise.. I see that being accountable to myself while my rent was being subsidized and living in a well resourced, safe, clean, sanitary community - along with making sure of my children's success in education and teaching them to create equity through homeownership and growing wealth thru equity - a life pattern followed by many - I found it be profitable. 3 college graduates and 2 with very good technical, managerial skills - I feel I set in motion a new pattern. They were children of abandonment (legal in Texas) but I stayed focused while **HUD OFFERED ME**

**THIS OPPORTUNITY OF RENT SUBSIDY** and made sure the path was going to be paved for them to have skills to help themselves and others come up and be more than "poor and barely making it." It worked.

So much more to say but this is only the beginning. Hopefully there will be more Participant inclusiveness in solving this problem of fair housing. Innovation is key and introducing a pattern of transformation for HUD funds that this be treated like an investment in the recipients not investors and rich getting richer. There should be set objectives and goals to help achieve high levels of success to further progress the next generation of recipients. If private developers and lending institutions continue to perpetrate segregated living in cities....stop giving away the citizens's resources and monies! It's going to take a village to change this pattern we are presently trapped in.

Hope this was helpful.

*B.Ross-Williams, Founder, Creator, TexasDisproportionateCommunities (formerly known as TexasCommuntiesFoundation) "Building Better Communities One City at a Time" (with a focus on women and children - the poorest populations in Texas.)*

---------- Forwarded message ---------
From: **Nicole Gardner** <NGardner@inclusivecommunities.net>
Date: Thu, May 2, 2024 at 4:44 PM
Subject: Fw: Take Action for Fair Housing: Support Affordable Housing in High Opportunity Areas
To: blrosswilliams@gmail.com <blrosswilliams@gmail.com>

Good Afternoon Ms. Williams,

The deadline for sending the email is Friday, May 3rd. Just asking you to write a quick email to show our dissatisfaction with the amount of affordable housing that has been developed in high opportunity areas.

Thank you,

**Nicole Gardner**
**Mobility and Outreach Counselor**
**Inclusive Communities Project**
**3301 Elm Street | Dallas, Texas 75226**
**Office: (214) 939-9239, option 1**
Inclusive Communities Project
Follow us online: Facebook Twitter Instagram

**From:** Nicole Gardner <NGardner@inclusivecommunities.net>
**Sent:** Monday, April 29, 2024 3:25 PM
**To:** blrosswilliams@gmail.com <blrosswilliams@gmail.com>
**Subject:** Fw: Take Action for Fair Housing: Support Affordable Housing in High Opportunity Areas

Ms. Williams,

Please see the attachment to help create your letter. It doesn't have to be long or substantial. Please let me know if you have any questions or concerns about writing this letter. I am happy to help.
Lastly, would you please copy Shamira Lawrence (Mobility Director) on the email that you send, as we like to keep track of our advocacy efforts. Her email address is slawrence@inclusivecommunities.net.


Thank you,

**Nicole Gardner**
**Mobility and Outreach Counselor**
**Inclusive Communities Project**
**3301 Elm Street | Dallas, Texas 75226**
**Office: (214) 939-9239, option 1**
Inclusive Communities Project
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**From:** Nicole Gardner
**Sent:** Thursday, April 18, 2024 4:28 PM
**To:** blrosswilliams@gmail.com <blrosswilliams@gmail.com>
**Subject:** Take Action for Fair Housing: Support Affordable Housing in High Opportunity Areas

Hello Ms. Williams,

I hope this email finds you well. We **have the opportunity to weigh in by writing a letter to show our dissatisfaction with the amount of affordable housing that has been developed in high opportunity areas.**

The Texas Department of Housing and Community Affairs (TDHCA) has released the draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice (AI) for public comment. This document guides the state's affordable housing strategy for the next five years, aiming to address disparities and promote fair housing practices.
You can access the draft AI here and submit comments until **May 3, 2024**, via:
- By mail: The Texas Department of Housing and Community Affairs, Housing Resource Center, P.O. Box 13941, Austin, TX 78711-3941
- By email: fair.housing@tdhca.texas.gov (The preferred method)
The lack of affordable housing in high opportunity areas perpetuates economic and racial segregation, limiting access to essential services and opportunities. By advocating for more affordable housing in these areas, we can promote social and economic integration, and create equitable communities.

4

Please join me in writing letters to express our support for fair housing policies and initiatives. **Attached is a template letter for your convenience.** Feel free to use the letter as a framework but please personalize the letter so that it will reflect your individual circumstances and thoughts. Additionally, we will also a Zoom session to answer any questions you may have about the letter writing on **Tuesday, April 23rd at 11-12pm**. <mark>Please respond to this email if you would like to attend this **optional** session.</mark>

Comments and emails must be submitted by May 3rd but we would like for you to submit as early as possible. **Please blind copy me on the email that you send or send me an email letting me know that you have sent your comments in.** We are so grateful for your willingness to help speak out when necessary. Let's raise our voices together to ensure everyone has the opportunity to live in a safe, affordable, and inclusive community.

**Helpful Links:**

https://texashousers.org/2024/03/14/the-gap-2024-report/

https://www.tdhca.texas.gov/state-texas-analysis-impediments-ai-fair-housing-choice.

Thank you,

**Nicole Gardner**
**Mobility and Outreach Counselor**
**Inclusive Communities Project**
**3301 Elm Street | Dallas, Texas 75226**
**Office: (214) 939-9239, option 1**
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Network for Good.

| | |
|---|---|
| **From:** | Joy Davis <jharasemay@gmail.com> |
| **Sent:** | Thursday, May 2, 2024 9:10 PM |
| **To:** | Fair Housing |
| **Subject:** | Comment on Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice |

Joy Davis
605 Berry Road #1803
Houston, Texas 77022

Re: Comment on Draft 2024 State of Texas analysis of impediments to Fair housing choice

My name is Joy Davis and I am a resident in Houston, Texas.

There needs to be housing constructed which includes people with felony convictions. Housing units built for individuals experiencing homelessness and also individuals with very low incomes should be expanded. Public Housing units should be built in all areas and not secluded are restricted to certain areas. Rent calculations should be adjusted to not take 30% of your income if you have lower incomes. Housing units should be constructed and designed with larger families in mind. Section 8 waiting lists should be expanded.

Market rates are not affordable to the people who reside in the public housing units. There are times when people are penalized going from paying income-based rents to market rents. The government should increase funding for affordable housing programs and invest in the construction of new public housing units. Units should be modernized. Expanded Support and resources for community land trusts to preserve affordable housing. Increase the amount of funding for grants and loans to help low-income individuals and families to purchase homes. Implement inclusionary zoning policies to require affordable units in new developments. Support tenant organizing and advocacy efforts.

When people are evicted from apartments, their belongings are left outside of their apartments in their front yards. I have seen an elderly woman evicted and all of her belongings were placed in the front yard as she sat there in disbelief in a wheelchair. There should be a program implemented that would help people with emergency transitional housing for at least 60 days as well as storage units made available to prevent their belongings from being trashed.

The Texas Rental Relief program should be continuously funded and available during disasters and afterwards. The Lite-up Texas program should be a permanent program since a number of families utilized it that resided in Public Housing.

Sincerely,

Joy Davis

| From: | Tris Woods <triswoods9@gmail.com> |
|---|---|
| Sent: | Thursday, May 2, 2024 4:34 PM |
| To: | Fair Housing |
| Subject: | 2024 State of Texas Analysis of Impediments to Fair Housing Choice: Public Comments |

Dear TDHCA,

My name is Trisha Woods, and I'm a former DHA recipient, with first-hand knowledge and experience of unfair housing practices. I am advocating for fair housing policies that will benefit low-income families and marginalized communities in our state. I am sure you can understand what decades of structural racism have created. It continues to live and thrive each day in society, especially along the lines of housing. Low-income and disenfranchised individuals have had to fight against racial disparities in housing, for generations and sadly we are living in an era where this archaic legacy continues to shape the present landscape.

Twenty years ago, I was a young girl with small kids. I had no family support system and very few community support systems. I took it upon myself to move into areas that would allow me to acquire the opportunity to live in prosperous communities as a mean to gain an education and allow my kids to live free from harm and danger as often witnessed in rough urban areas. Transitioning from Dallas County to Collin County was not an easy task. I was met with supremacy attitudes, racial tension, and microaggressions. It disheartens me to know twenty years later these same ideologies continue to have a place in our Texas laws. Texas has failed to adequately address the most basic needs of low-income families. Restricting low-income families people from living in high-valued areas makes it more difficult to access good education, careers, and safer environments.

I advocate for this cause so importantly, because, I desired to set my children up for success, the kind of success that wasn't set up for me. Please understand how integral it is for mothers like myself who have the same hopes and dreams for their children. Your choice to develop more high-opportunity areas will increase better opportunities for healthcare services, better school opportunities, and community resources for individuals who may not have access to these accommodations.

I urge TDHCA to prioritize developing tax credit properties in well-resourced areas and implementing strategies to deconcentrate poverty. Investing in affordable housing in high-opportunity areas creates more equitable communities and helps low-income families thrive.

Thank you for your attention to this important matter. I look forward to seeing positive action taken to address these critical housing issues and promote fair housing opportunities for all residents of our state.

Respectfully,

Trish Woods

ICP Cabinet Member

| | |
|---|---|
| **From:** | Karla Graham <karlagraham1127@gmail.com> |
| **Sent:** | Friday, May 3, 2024 11:40 AM |
| **To:** | Fair Housing |
| **Subject:** | Fair and Affordable Housing |

[You don't often get email from karlagraham1127@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

Dear TDHCA,

My name is Karla P. Graham, and I am a current voucher holder advocating for fair housing policies. My areas of concern, will be those that are vital and benefit the low-income families residing in our state.

Although Texas is a great state for relocating those who have great jobs and unlimited resources, it has failed to provide more affordable housing in areas that have more available resources. These areas are proven to have quality housing, education, and employment opportunities. This limits low-income families, and will continue to point out all of the racial and systemic inequalities that keep us divided.

By providing more access to affordable housing in these high opportunity areas, you can blaze a path. This will offer these families ways to propel themselves out of poverty and into a wealth of better opportunities.

As a voucher holder, I have witnessed the discrimination, the struggles, and the silent cries of many low-income families. We only seek better areas to live for our children, while resting assured this will uplift and cause a safer, more permanent change in our lives.

I urge TDHCA to prioritize and invest in more affordable housing in these higher opportunity areas! This will promote fairness for low-income families, finding solace while excelling. Help us find and raise our voices, and join us as we fight to find safer places to be great!!

Thank you for your attention to this important matter. I look forward to seeing positive action taken to address these critical housing issues and promote fair housing opportunities for all residents of our great state!

Respectfully,
Karla P. Graham

Sent from my iPhone

May-3-2021

To Whom it may Concern

I am Brigitte Norris a current walker voucher holder, advocating for fair housing policy that benifit low income families in the state of Texas

I am deeply concerned about the current disparities in housing opportunities and believe that addressing these issues is essential for creating a more equitable society.

The state of TEXAS HAS FAILED to adequately address the need for affordable housing in well resources areas.

It is very Important to find housing in a high opportunity area
1 Better SCHOOLS.
2 Better Paying jobs
3 Better Grocery Stores
4 LESS Crime
5 SAFer Neighborhoods
6 MEET Different people who CAN Inspire. you to want to Live a Better LIFE

Christopher Jenkins

3401 Fannin St Houston, Texas 77004

Texas Department of Housing and Community Affairs

Attn: Housing Resource Center

P.O. Box 13941

Austin, Texas 78711-3941

Re: Comment on Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice

Hello,

My name is Christopher Jenkins, I am a small business owner and community organizer. I am from Acres Homes, which is in Houston, Harris County, Texas.

I am highlighting and raising awareness about compliance issues in Texas on all levels that we're ignored during a pandemic protocol. Many of these issues have either impacted me or someone I know.

My goal is to help eliminate barriers to fair, safe, affordable housing that exist for people of protected classes.

There are impediments such as Not in My Backyard Syndrome (NIMBYism) limits affordable housing development in which restricts housing choice for protected classes. There is lack of awareness about fair housing and many obstacles for homeownership and lending for protected people. There is also a lack of affordable and accessible housing for those with disabilities. Many barriers exist for specific protected classes that may limit mobility and free housing choice. Geographically, unpredictable events disproportionately impacted protected people, which made them homeless or dislocated.

The City of Houston along with Harris County did not immediately respond to the needs of the community when it came to protecting our rights. The State of Texas on the other hand, did not enforce the executive order set in place. The protected classes across the State we're ignored and neglected in which many residents became homeless. History is important to me I believe if people had some type of education, you would know that Fair Housing Act of 1968 was put into place to prevent discrimination. I was staying in an apartment where I recently got evicted from and majority of my neighbors was was multi-cultural. Residents we're treated differently because of their race, color, national origin, religion, sex (including gender identity and sexual orientation), family status and for having a disability. Even if you when your case in court, it still shows up on your

record that you received an eviction. They will always be on your background check and will eliminate you from the process of getting somewhere else to stay. Disaster relief has been limited due to the lack of resources as we had to deal with hurricanes, tornadoes, freezes, windstorms, global warming, inflation among other issues that put residents at risk of becoming homeless or dislocated. Tax Credits are not attainable to minority business owners because there are limited opportunities to gain partnerships within the community development aspect. Accessible housing and Public Housing are not accessible because of limited outreach programs and housing resources are limited. This creates a continuing process of homelessness which becomes a public safety issue in which people can become physically or mentally ill.

There should be actions to combat homelessness, the effects of Historical Housing Discrimination, to remediate ongoing housing discrimination, increase the amount of information available to low-income Texans about their rights and access to affordable housing programs.

Justice of the Peace should be audited due to the lack of accountability and transparency while abusing their authority and causing harm for citizens leading to more residents becoming homeless. They are continuously late on paperwork and did not enforce the executive order from the CARES Act. They continue to have system errors and lack proper training when it comes to processing documents that are time sensitive and could get someone evicted.

The Harris County Appraisal District systematically displaced many residents that had tax issues or just simply didn't understand real property. Such as with Hurricane Harvey, they paused payments, but they failed to have a contingency plan to prevent residents from being homeless after a natural disaster.

The Texas Department of Housing and Community Affairs (TDHCA) should expand the HOME grants for rural housing, the Emergency Solutions Grant with services for the homeless, the Colonia Self-Help program and Section 8.

The Texas Department of Agriculture (TDA) and the Texas General Land Office (GLO) need to do a better job in allocating community Development Block Grants because they have failed Houston and Harris County for decades including disaster recovery.

The Texas Department of Health and Human Services (DSHS) should provide more information about housing opportunities for persons in protected classes.

The Texas Workforce Commission – Civil Rights Division (TWC) needs to be more effective in the process of their operations. They have a lack of transparency and accountability. The Department of Housing and Urban Development (HUD) needs to implement Equal Housing Opportunity have more accountability and oversight to protect customers and consumers to ensure fair housing.

We need a major overhaul of the city, county and state systems along with comprehensively improving risk management. We need the creation of Public Probate Court to be a resource for families of descendants with small estates that are unable to afford an attorney or for whose estates not known or suitable next to kin who is available or willing to serve.


Thank you,

Christopher Jenkins