TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS Draft 2024 State of Texas Analysis of Impediments to Fair Housing Choice

Disclaimer

Attached is a draft of the 2024 State of Texas Analysis of Impediments to Fair Housing Choice. The version herein is the version that will constitute the official version for purposes of public comment.

Public Comment

Public Comment Period: Starts: <u>8:00 a.m. Wednesday, April 3, 2024 Central Time</u>

Ends: 5:00 p.m. Friday, May 3, 2024 Central Time

Comments received after 5:00 p.m. Central time on Friday, May 3, 2024 will not be accepted.

Written comments may be submitted, in hard copy or electronic formats to:

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

Written comments may be submitted in hard copy or email formats within the designated public comment period. Those making public comment are encouraged to reference the specific draft rule, policy, or plan related to their comment as well as a specific reference or cite associated with each comment.

Please be aware that all comments submitted to the TDHCA will be considered public information. For more information on the draft document and fair housing, please visit: https://www.tdhca.texas.gov/state-texas-analysis-impediments-ai-fair-housing-choice

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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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



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Executive Summary

The Texas Department of Housing and Community Affairs (the Department) has produced this Draft 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 response 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 draft AI, the Department considered past impediments and whether they continued to exist, the trends and observations seen through the earlier chapters in this document, as well as new input received during early consultations. Comment received during the fall 2023 early consultation period is covered in detail in both Chapter 5 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 impediments to be resolved. However, based on newer insights and input those impediment statements have been revised to make them as current and relevant as possible. To that end, the state has now identified six impediments to fair housing choice that it will strive to address during the next five years. Those impediments, listed in summary form below, are expanded upon in Chapter 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 economic disruptions, 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.

This draft 2024 AI is being presented for a 30-day formal public comment period and public hearings. Once these opportunities for comment are provided and comment considered, a final AI document will be presented to the Department's Board for consideration and final approval before submission to HUD.

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 has 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 Al and the state's 5-Year Consolidated Plan and invited written comment by one of the following four ways:

- Using an <u>early input form</u>:
- 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.

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

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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 subrecipients.

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 will be open from April 3, 2024, to May 3, 2024. Notification of the public comment period and public hearings will be announced by email distribution and published in the *Texas Register* on March 29, 2024. Four public hearings will be held. Notification of the public hearings will also be released by TDHCA's X (Twitter) and Facebook accounts and posted on the TDHCA Events Calendar and the TDHCA Public Comment Center webpages.

Comment Received Outside the Public Comment Period

Should any comment be received outside of the public comment period it will be summarized here.

Summary of Comments and Staff Responses

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

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."

Racially or Ethnically Concentrated Areas of Poverty

HUD has developed a census tract-based definition of Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs²). 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 Al 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 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

¹ The Department of Justice. "<u>The Fair Housing Act</u>", updated June 22, 2023.

²AFFH-T Data Documentation, Data Version AFFHT0004, November 2017.

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 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 265Appendix 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

³ Federal Register Part IV, Volume 75, Number 123, 37252. Monday, June 28, 2010.

⁴ United States Census Bureau. "<u>Texas Joins California as State with 30-Million-Plus Population.</u>" 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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: <u>Diversity Index by Census Tract, Texas-MF Apps 2018-2022 vs. Diversity Index by</u> 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
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 6/18/18⁶. Note: Texas Demographic Center projections include Hispanic as a race, not an ethnicity.

⁵ Texas Demographic Center. <u>Texas Population Projections 2010 to 2050</u>. January 2019.

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."

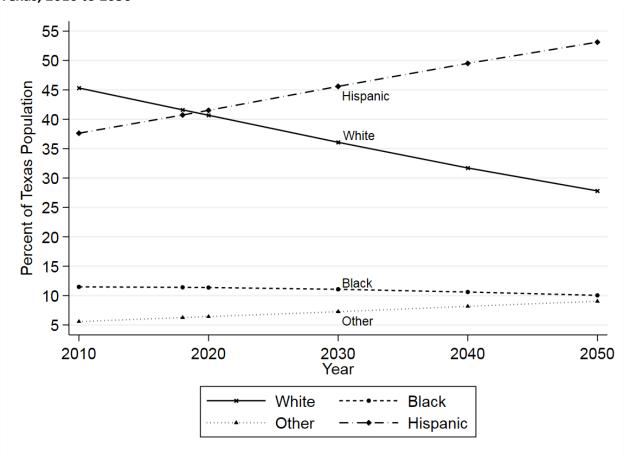


Figure 2-4: Population Projections by Race and Ethnicity as a Percentage of State Population, Texas, 2010 to 2050

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

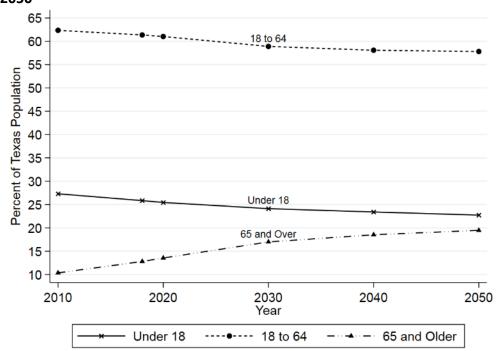
Age Group	2018	2010	2020	2030	2040	2050
Under 18 Years	7,251,938	6,865,824	7,332,021	7,882,049	8,553,347	9,207,545
18 to 24 Years	2,801,971	2,572,969	2,879,390	3,094,071	3,315,888	3,648,314
25 to 44 Years	7,630,222	7,071,855	7,805,278	8,715,998	9,615,093	10,389,536
45 to 64 Years	6,785,736	6,033,027	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



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."

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

⁷ United States Census Bureau, <u>American Community Survey and Puerto Rico Community Survey 2022 Subject</u> Definitions.

⁸ United States Census Bureau, <u>American Community Survey and Puerto Rico Community Survey 2022 Subject Definitions.</u>

Percent of Households with a Milnor 32.1%	Percent of Households with a Minor	32.1%
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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.

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%
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 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 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

		Percent of Households at or Below		Percent of Families at or Below Income
	Households	Income Group	Families	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%

^{*}The ACS does not provide estimates for the number of residents under 18 with an Independent Living disability.

	Households	Percent of Households at or Below Income Group	Families	Percent of Families at or Below Income Group
\$15,000 to	nousellolus	ilicollie Group	Faiiiiles	Group
\$15,000 to \$24,999	409,146	17.1%	409,146	11.9%
\$25,000 to	403,140	17.170	403,140	11.570
\$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	ı

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%

Income Grouping	Household Count	Percent
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, <u>Unemployment Rate [UNRATE]</u>, 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%
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 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

				Percent of Statewide
	Non-Metro	Metro	Total	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. 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.

⁹ <u>Housing and Health Services Coordination Council meeting transcript, Testimony before the Housing & Health</u> Services Coordination Council Public Forum

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%

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

¹⁰ NSDUH, (2021). <u>2021 NSDUH: Model-Based Estimated Totals For States (In T</u>housands)

¹¹ Padgett, Deborah K, Leyla Gulcur, and Sam Tsemberis. <u>Housing First Services for People Who Are Homeless with Co-Occurring Serious Mental Illness and Substance Abuse</u>. Research on Social Work Practice, Vol. 16 No. 1, January 2006.

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. Figure 2-19 shows the number of persons living with HIV in Texas. Persons living with HIV/AIDS may be considered disabled if the disease substantially limits at least one major life activity, the person has a record of an impairment, or is regarded as having an impairment. This subpopulation is included in the AI because of this particular group's possible need for supportive housing.

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

	Persons	Persons	Total	2017-2021	Percent of Persons
	with HIV-	with HIV-	Persons	Total	with HIV to Statewide
State	Rural ¹³	Urban	with HIV ¹⁴	Population	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.

¹² Texas Department of State Health Services. (2022, November 7). 2021 Texas HIV PLWH surveillance report Unpublished Data: 2021.

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.

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 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.

^{*56} victims were unable to be categorized as residing in Metro or Non-Metro counties

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

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. 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%

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	Non - Hispanic
	Latino	or Latino
United States	27%	73%
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.

 ¹⁷ Urban Institute. (2013, January). <u>Improving the lives of public housing's most vulnerable families</u>.
 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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

	Head of		
	Household		Female Head of
	with a	Household	Household with a
	Disability	with a Child	Child
	2 10 0.10 1.11 0 7		C
United States	38%	35%	32%

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. 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%

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

	White	African American	Hispanic	Other	Asian	Native American
Family						
Reunification						
S	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.

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%. 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.

¹⁹ U.S. Department of Housing and Urban Development. (2023, December). <u>The 2023 Annual Homeless Assessment Report (AHAR) to Congress</u>.

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

				% of	Non-	% of Non-
	Total	% of Total	Veterans	Veterans	Veterans	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-

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

Regional Analysis

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.

Figure 3-1: Texas Counties in TDHCA Service Region 1

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.

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 3-2: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 1, 2010 to 2050</u>

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/ECAPs²². The definition involves a racial/ethnic concentration threshold and a poverty threshold. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-White population of 50% or more. Regarding the poverty threshold, HUD defines neighborhoods of extreme poverty as census tracts where 40% or more of individuals are living at or below the federal poverty level. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. A neighborhood can be considered a R/ECAP if it has a poverty rate that exceeds 40% or if it is three or more times the average tract poverty rate for the Metropolitan or Micropolitan Statistical Area, whichever threshold is lower. Census tracts with this level of poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. More detail on the definition and delineation of 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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)</u>.

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."

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

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.

To use the above map, click the link and navigate to the tab that corresponds to the map title above. To highlight a specific region use the Region drop down located on the right hand side of the Tableau window, check only the box of the Region you would like to view.

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: <u>Percent of Civilian Non-Institutionalized Population with Disability by Disability Type, Region 1, 2017 to 2021</u>

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: <u>Percent of Civilian Non-Institutionalized Population with Disability by Race and Ethnicity</u>, 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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Amarillo CBSA, TX, 2021</u>

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: <u>Share of Job Counts by Distance between Work Census Block and Home Census Block, Lubbock CBSA, TX, 2021</u>

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

Figure 3-15: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 1,</u> 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: <u>Number of Bedrooms in Renter and Owner Occupied Units with Complete</u> 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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 2, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)</u>.

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

Figure 3-29: <u>Diversity Index, Region 2, 2021</u>

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: <u>Share of Job Counts by Distance between Work Census Block and Home Census Block, Abilene CBSA, TX, 2021</u>

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

Source: Job center information, On the Map data tool 2021, Census.gov. 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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: <u>Share of Job Counts by Distance between Work Census Block and Home Census Block, Wichita Falls CBSA, TX, 2021</u>

Figure 3-40: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 2,</u> 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.

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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.

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

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

Race and Ethnicity

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

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

Source: U.S. Department of Housing and Urban Development. <u>Racially or Ethnically Concentrated Areas of Poverty</u> (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: <u>Diversity Index, Region 3, 2021</u>

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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> <u>Dallas-Fort Worth-Arlington CBSA, TX, 2021</u>

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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Sherman-Denison CBSA, 2021</u>

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: <u>Percent of Households Lacking Complete Plumbing or Kitchen Facilities, Region 3,</u> 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, 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.

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Figure 3-75: <u>Map of Active Multifamily Properties Participating in TDHCA Programs, Region 3, 2023</u>

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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional</u> 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. <u>Racially or Ethnically Concentrated Areas of Poverty</u> (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.

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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: <u>Share of Job Counts by Distance between Work Census Block and Home Census Block, Longview CBSA, TX, 2021</u>

Figure 3-89: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Share of Job Counts by Distance between Work Census Block and Home Census Block, Texarkana CBSA, TX-AR, 2021</u>

Figure 3-91: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Tyler, TX, 2021</u>

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 oncerevered "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: <u>Population Projections by Race and Ethnicity as a Percentage of the Population,</u>
<u>Region 5, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).</u>

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: <u>Household Income Category by Race and Ethnicity, Region 5, 2016 to 2020</u> 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.

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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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Number of Bedrooms in Renter and Owner Occupied Units with Complete Plumbing and Kitchen Facilities</u>, 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.

Regional Analysis

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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional</u> 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. <u>Racially or Ethnically Concentrated Areas of Poverty</u> (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: <u>Household Income Category by Race and Ethnicity, Region 6, 2016 to 2020</u> 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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 7, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).</u>

Figure 3-153 shows the Diversity Index by census tract for Region 7.

Figure 3-153: <u>Diversity Index</u>, <u>Region 7, 2021</u>

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: <u>Household Income Category by Race and Ethnicity, Region 7, 2016 to 2020</u> 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

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other regions are reflected in lower rates of disability among both men and women and among children.

Figure 3-157: <u>Percent of Civilian Non-Institutionalized Population with Disability by Gender and Age, Region 7, 2017 to 2021</u>

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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: Age of Housing Stock by County, Region 7, 2017 to 2021

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: Percent of Households with One or More Housing Problems, Region 7, 2016 to 2020

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: Percent of Households Lacking Complete Plumbing or 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 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: <u>Number of Bedrooms in Renter and Owner Occupied Units with Complete</u> <u>Plumbing and Kitchen Facilities, Region 7, 2016 to 2020</u>

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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 8, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).</u>

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: <u>Household Income Category by Race and Ethnicity, Region 8, 2016 to 2020</u> 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.

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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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> Killeen-Temple CBSA, TX, 2021

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

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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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Waco CBSA, TX, 2021</u>

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 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 9, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)</u>.

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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> <u>San Antonio-New Braunfels CBSA, TX, Region 9, 2021</u>

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: <u>Number of Bedrooms in Renter and Owner Occupied Units with Complete</u> 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.

Regional Analysis

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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 10, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).</u>

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: <u>Household Income Category by Race and Ethnicity, Region 10, 2016 to 2020</u>
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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Corpus Christi CBSA, TX, Region 10, 2021</u>

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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Victoria CBSA, TX, Region 10, 2021</u>

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.

Regional Analysis

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

Regional Analysis

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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 11, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).</u>

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: <u>Household Income Category by Race and Ethnicity, Region 11, 2016 to 2020</u> 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: <u>Share of Job Counts by Distance between Work Census Block and Home Census</u> Block, Brownsville-Harlingen CBSA, TX, Region 11, 2021

Figure 3-260: <u>Job Counts by Distance between Work Census Block and Home Census Block, Brownsville-Harlingen CBSA, TX, Region 11, 2021</u>

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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Laredo CBSA, TX, Region 11, 2021</u>

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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population</u>, 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: <u>Map of R/ECAPS, Region 12, 2024</u>

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

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.

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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: <u>Household Income Category by Race and Ethnicity, Region 12, 2016 to 2020</u>
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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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: <u>Job Counts by Distance between Work Census Block and Home Census Block, Odessa CBSA, TX, Region 12, 2021</u>

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: <u>Job Counts by Distance between Work Census Block and Home Census Block,</u> 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.

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.

^{*} Data unavailable for Loving County due privacy and anonymity concerns brought about by the county's small population.

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.

Regional Analysis

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: <u>Population Projections by Race and Ethnicity as a Percentage of the Regional Population, Region 13, 2010 to 2050</u>

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. <u>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).</u>

Figure 3-305 shows the Diversity Index by census tract for Region 13.

Figure 3-305: <u>Diversity Index</u>, <u>Region 13</u>, 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, 2024 State of Texas Analysis of Impediments to Fair Housing Choice Page 121

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: <u>Job Counts by Distance between Work Census Block and Home Census Block, El Paso CBSA, TX, Region 13, 2021</u>

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: <u>Number of Bedrooms in Renter and Owner Occupied Units with Complete</u> 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 <u>Texas Occupations Code Chapter 1201</u> 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.

<u>Texas Occupations Code §1201.252</u> 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. <u>Texas Occupations Code §1201.008</u> grants municipalities the authority to prohibit mobile homes (as opposed to manufactured homes) from being used as a residential dwelling. Finally, <u>10 TAC Chapter 80</u>, 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.

<u>Texas Occupations Code §1201.008</u>, 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.

<u>Texas Occupations Code</u>, § 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, <u>28 TAC §5.4011</u> 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 2024 State of Texas Analysis of Impediments to Fair Housing Choice Page 129

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. <u>Local Government Code §214.902</u> 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, <u>Texas Local Government Code §214.905</u> 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. <u>Texas Local Government Code §250.008</u>, 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.

<u>Local Government Code §§214.212</u> and <u>214.215</u> 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.

<u>Texas Local Government Code Chapter 233</u> 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:

<u>Texas Health and Safety Code Chapter 247</u> 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. (<u>Health and Safety Code, §247.0264</u>)

<u>Chapter 247</u> 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.

<u>Texas Health and Safety Code Chapter 260</u>, 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 <u>Chapter 260</u> 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 <u>Chapter 260</u> does not give them that power.

<u>Texas Health and Safety Code, Chapter 591.003</u>. Group homes are regulated by the HHSC. The definition of a Group Home is found in <u>Texas Health and Safety Code Chapter §591.003(10)</u>. 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:

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

Restrictive Covenants

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

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

In the 88th Regular Session the Texas Legislature passed H.B. 1193 creating <u>Texas Property Code Section 202.024</u> 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.

<u>Texas Government Code Chapter 469</u>, 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 <u>Tex. Gov't Code §469.052</u>.

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.

<u>16 TAC Chapter 68</u> 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 <u>Texas Occupation</u> <u>Code, Chapter 1051</u>, 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, <u>Texas Property Code Chapter 301</u> 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
1.206

For construction of single family housing funded by the Department, <u>Texas Government Code</u> §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, <u>Tex. Gov't Code §531.059(a)(2)</u> 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, <u>Texas Local Gov't Code Chapter 211</u>, Municipal Zoning and <u>Texas Local Gov't Code 212</u>, 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, <u>Local Gov't Code Chapter 231</u> 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). <u>Local Gov't Code Chapter 231</u> 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. <u>Texas Local Government Code Subchapter A (§232.001)</u> 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.

<u>Civil Practice and Remedies Code</u>, §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.

<u>Local Government Code Chapter 232 Subchapter E</u> 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 <u>Subchapter A of Chapter 232</u>, 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.

<u>Texas Local Government Code Chapter 253</u> 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.

<u>Texas Local Government Code Chapter 373A.001</u>, 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 <u>379C</u>, <u>379E</u> and <u>379H</u> 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.

<u>Local Government Code §374.014</u> 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, <u>Texas Property Code §21.046</u> 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.

<u>Texas Local Government Code Chapter 379E</u> 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.

<u>Texas Local Government Code Chapters 392</u> and <u>393</u> 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.

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

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

<u>Texas Local Government Code §395.016(g)</u> 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.

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

State standards that authorize local governments to remove blight and slums through the use of eminent domain, or restrict them from taking those actions, or that authorize them to sell or demolish multifamily housing or substandard housing can affect low-income housing options. The main concern with such provisions is the potential to dislocate disproportionate numbers of FHAA-protected persons without compensation or assistance with relocation. The potential for this to take place could be authorized under Texas Gov't Code §2206.001(3).

State Housing Assistance and Siting

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

TDHCA Programs

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

The Department publishes rules on site and development requirements and restrictions. Such regulations include requirements and limitations with regard to development in floodplains; siting near undesirable site features such as within a certain distance of junkyards, solid waste facilities, etc.; and siting in a location with neighborhood risk factors such as high crime areas or being in a school attendance zone of a school that has not met 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.

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.

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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. 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.

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, <u>Local Government Code Title 14</u>, <u>Subtitle B, Chapter 615</u>, <u>Subchapter C</u>, 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." (<u>Local Govt. Code 615.022</u>)

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 percent 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.

<u>Texas Utilities Code §14.005</u>, 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 <u>Texas Government Code</u> <u>§2306</u>, <u>Subchapter KK</u>, 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 <u>Texas Government Code §2306</u>, <u>Subchapter NN</u>, 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

<u>Texas Property Code Chapter 301</u> 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.

<u>Texas Property Code §301.025</u> 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 <u>Texas Property Code §92.015</u>, 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, <u>Texas Health and Safety Code §592.016</u> 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.

<u>Texas Property Code Chapter 92</u> addresses landlord-tenant rights in general, <u>Chapter 94</u> covers landlord-tenant relations for lots in a manufactured home development (not rental of the homes themselves), and <u>Chapter 82</u> 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.

<u>Texas Local Government Code §214.903</u> also authorizes municipalities to adopt fair housing ordinances.

In addition, housing authorities under <u>Texas Local Government Code Chapter 392</u> 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" (<u>Tex. Local Gov't Code §392.006</u>).

The Texas Legislature, in 2015, enacted <u>Texas Local Government Code §250.007</u> 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, <u>Tex. Gov't Code Chapter 2306.257</u>, and the Department's administrative rules found at <u>10 TAC Chapter 1</u> also incorporate requirements of federal law providing for protections and reducing barriers to fair housing choice.

The Department, in an attempt, 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. <u>Texas Insurance Code Chapter 544</u> 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 <u>Texas Insurance Code §560.002</u>, 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.

<u>The Texas Department of Insurance Bill of Rights</u>, which is posted on the agency's website, has listed the protected class and protections offered.

In addition, <u>Texas Insurance Code Chapter 2004</u> requires designation of underserved areas for residential property insurance. <u>28 TAC, §§5.3700</u> and <u>3702</u> have designated specific underserved areas for residential property insurance. Factors for considering an area as underserved takes 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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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 <u>Texas Finance Code</u>, §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, <u>Texas Finance Code §§341.401</u> and <u>341.402</u> cover prohibitions and violations for discrimination in banking.

Real Estate

Protections of real estate transactions are specified in <u>Texas Property Code, Chapter 301</u>. 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 (<u>Texas Occupations Code 1101</u> and <u>22 TAC §535.64</u>). 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:

<u>Texas Tax Code §11.181</u>, Charitable Organizations Improving Property For Low-Income Housing

<u>Texas Tax Code §11.182</u>, Community Housing Development Organizations Improving Property For Low-Income And Moderate-Income Housing: Property Previously Exempt

<u>Texas Tax Code §11.1825</u>, Organizations Constructing Or Rehabilitating Low-Income Housing: Property Not Previously Exempt

<u>Texas Tax Code §11.1826</u>, 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

<u>Texas Tax Code §11.261</u>, 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

<u>Site and Neighborhood Reviews</u> - 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.

<u>Qualified Allocation Plan (QAP)</u> – 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.

<u>Section 8</u> – 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.

<u>Amy Young Barrier Removal Program</u> – 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.

<u>The Department's Homebuyer programs</u> (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.

<u>The HOME Program</u> 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.

<u>The Homeless Housing and Services Program (HHSP)</u> 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 <u>Emergency Solutions Grants Program</u> (ESG) provides funding for homeless services. 2023 ESG NOFA included a scoring criterion that awarded points under a competitive application to entities 2024 State of Texas Analysis of Impediments to Fair Housing Choice Page 155

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.

<u>Texas Rent Relief (TRR)</u> – 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.

<u>Texas Homeowner Assistance Fund (HAF)</u> – 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

<u>2019 Fair Housing Education and Outreach Grant (FHEO)</u> – 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.

<u>2021 Fair Housing Education and Outreach Grant Application</u> – 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 was 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.

<u>Fair Housing Month Activities</u> — Every April, TDHCA staff collaborates 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.

<u>November Fair Housing Series</u> – 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.

<u>On-Demand trainings</u> – 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.

<u>Contact Information</u> – Staff created a direct fair housing email address <u>Fair.Housing@tdhca.texas.gov.</u> 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.

<u>Library of Fair Housing Guidance</u> – 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 <u>Section 8 Program</u> 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 <u>ESG Program</u>, 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

<u>Language Access</u> – 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.

<u>Bostock v. Clayton and Executive Order 13988</u> – 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.

<u>Violence Against Women Act (VAWA)</u> — 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.

<u>Fair Housing Training Webinars</u> – 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.

<u>Program and Policy Language</u> – 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.

<u>TWC Monthly Federal Funds Reports</u> – 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.

<u>TDHCA Enforcement Committee</u> – 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.

<u>Written Policies and Procedures Reviews</u> – 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" 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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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
 - o 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.
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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 percent 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 percent of the Small Area Fair Market Rent (SAFMR) where available, or 2) 130 percent 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 percent for up to 20 percent of units that receive rental assistance.
- o This helps eligible households secure their chosen units when they do not initially qualify for rental assistance.

Negotiating Rent and Utilities:

- 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.
- 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:

- 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:

 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.
- 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.
 - 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
	Reasonable Accommodations/	Dallas Apartment	
02/15/2022	Modifications Training	Association	55
		San Antonio	
	Reasonable Accommodations/	Apartment	
10/12/2022	Modifications Training	Association	65
		Houston	
	Reasonable Accommodations/	Apartment	
10/27/2022	Modifications Training	Association	78
		Houston	
	Reasonable Accommodations/	Apartment	
12/14/2022	Modifications Training	Association	66
		San Angelo	
	Reasonable Accommodations/	Apartment	
02/15/2023	Modifications	Association	90
02/21/2023	Reasonable Accommodations/	Dallas Apartment	
10/21/2016	Modifications	Association	85
		Lubbock	
	Reasonable Accommodations/	Apartment	
3/22/2023	Modifications	Association	150
		Greater Dallas	
	Reasonable Accommodations/	Apartment	
4/20/2023	Modifications	Association	85
	Reasonable Accommodations/	Texas Apartment	
4/5/2023	Modifications	Association	150

Date	Topic	Location	Attendees
		Conference &	
		Expo (Fort Worth)	
	Texas Appraisal Licensing Certification		
6/13/2023	Board/Investigative Process Training	Austin	15
		Texarkana	
9/18/2023 &	Reasonable Accommodations/	Apartment	
9//20/2023	Modifications Training	Association	70
		Longview	
	Reasonable Accommodations/	Apartment	
9/19/2023	Modifications Training	Association	80
		Tyler (Piney Wood	
	Reasonable Accommodations/	Apartment	
9/21/2023	Modifications Training	Association)	88
	Reasonable Accommodations/		
10/25/2023	Modifications Training	Lubbock (AA)	130
	Reasonable Accommodations/		
11/14/2023	Modifications Training (Webinar)	San Antonio (AA)	40
	Reasonable Accommodations/		
12/12/2023	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

	Fiscal		Number of
Totals	Year	Resolution Type	Lending Cases
	2021	Complainant failed to cooperate	1
	2021	Closed for Lack of Jurisdiction	1
	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 zero percent.
- 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.

²⁵ Source: 2016-2020 Comprehensive Housing Strategy Data, Table 1

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 ownerbuilder 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 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, 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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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: Amy Young Barrier Removal Program, Households Served by Race and Ethnicity

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

²⁶ Source: 2016-2020 Comprehensive Housing Strategy Data, Table 1

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.

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: <u>Texas Mortgage Credit Certificate</u>, <u>Households Served by Race</u> 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 disability²⁸

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:

 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.

²⁷ Source: 2021 5 Year ACS. Table S1701 and DP05

²⁸ Source: 2021 5 Year ACS, Table S1703

- 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: <u>Section 811 Project Rental Assistance</u>, <u>Total Applicants and Households Served by</u> 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 incomequalified 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.

Figure 6-9: <u>Tenants in TDHCA-Monitored Units</u>, by Race

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

²⁹ Source: TDHCA Central Database, pulled Q4 2023

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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 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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 year's worth 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 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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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 so 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.

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).

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. Despite pressures from NIMBY groups opposing affordable housing, 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 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: <u>TDHCA Community Affairs Total Dollars Spent, by County</u>
Figure 6-16: <u>TDHCA Community Affairs Households Served, by County</u>

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 five percent of CSBG funds are awarded on a

³¹ Weatherization in the State of Texas: A Report to Meet the Requirements of Rider 14 of H.B.1, 87th Legislature

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.

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

Delivery Areas								
HIV Service Delivery Area	Total Participants	American Indian/ Alackan Nativo	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 percent 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: <u>2019 Texas HIV Epidemiologic Profile</u> data from the Department of State Health Services (DSHS).

Percentages may not add to 100 percent 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 percent 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
	Bastrop, Blanco, Burnet, Caldwell, Fayette, Hays, Lee, Llano, Travis,
Austin	Williamson
Brownsville-	
Harlingen	Cameron, Hidalgo, Willacy
Bryan-College	
Station	Brazos, Burleson, Grimes, Leon, Madison, Robertson, Washington
	Aransas, Bee, Brooks, Duval, Jim Wells, Kenedy, Kleberg, Live Oak,
Corpus Christi	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
	Austin, Chambers, Colorado, Fort Bend, Harris, Liberty, Montgomery,
Houston	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-	Angelina, Houston, Jasper, Nacogdoches, Newton, Polk, Sabine, San
Lufkin	Augustine, San Jacinto, Shelby, Trinity, Tyler
	Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes,
San Antonio	Kendall, Kerr, Medina, Wilson
Sherman-Denison	Cooke, Fannin, Grayson
Texarkana-Paris	Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River, Titus
	Anderson, Camp, Cherokee, Gregg, Harrison, Henderson, Marion, Panola,
Tyler-Longview	Rains, Rusk, Smith, Upshur, Van Zandt, Wood
	Dimmit, Edwards, Kinney, La Salle, Maverick, Real, Uvalde, Val Verde,
Uvalde	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, during another economic disruption, 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 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

³² An unemployment rate of under 5% is generally considered to be "normal" or "natural." See Federal Reserve Bank of San Francisco <u>"What is the New Normal Unemployment Rate?"</u> 2/14/2011

³³ St. Louis Federal Reserve FRED Economic Data, Texas Unemployment Rate

³⁴ Unemployment rate in the United States from 1971 to 2015, by income tier. Statista

³⁵ St. Louis Federal Reserve FRED Economic Data, Texas Unemployment Rate

³⁶ Racial Differences in Economic Security: Housing. U.S. Department of the Treasury, November 4, 2022.

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 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

³⁷ Brannen, John. "As evictions reach historic levels in Harris County, families in Houston ISD are bearing the brunt" March 21, 2023

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
 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)

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 Al, 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.

These findings suggest two divergent difficulties faced by Black renter households and Hispanic renter households. Black renter households may be more vulnerable to acute shocks to economic systems. The finding that Black households were overrepresented, combined with the previous data showing Black Americans being more heavily impacted by spikes in unemployment³⁸ both combine to provide strong evidence that Black renter households are indeed more often

³⁸ St. Louis Federal Reserve FRED Economic Data, <u>Texas Unemployment Rate</u> 2024 State of Texas Analysis of Impediments to Fair Housing Choice

negatively impacted by exogenous shocks. The second observation is that Hispanic renter households presumably faced some sort of barrier to entry to the program. Similar to Black households, Hispanic Americans experience higher unemployment rates both regularly and in spike events compared to the rest of the country.³⁹ 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 scenario is not the case. The possible cause of this is hard to identify because 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 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 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. 40 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. 41 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

³⁹ St. Louis Federal Reserve FRED Economic Data, <u>Texas Unemployment Rate</u>

⁴⁰ American Community Survey, Table DP04. 2022 5-Year data table and map.

⁴¹ American Community Survey, Table S2502. 2022 5-Year data table

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.

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 avoid or move up out of homelessness. This could take the form of short term hotel vouchers, landlord incentives to avoid eviction, utility deposits, or short term rent or pet rent payments. 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 Texas⁴²) are slightly underrepresented. 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 renter households working to avoid homelessness. With that in mind, it is difficult to draw any solid conclusions about the needs of 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. Among those evictions that were avoided or delayed, 57.0% were Black or African American households, 29.6% were White, and 22.7% were Hispanic or Latino of any race. This disparity points to a few different possibilities:

⁴² Texas Homeless Data Sharing Network Data Dashboard. Texas Homeless Network. December 18, 2023.

- 1. that White households were more able on average to secure legal counsel without the aid of this program;
- 2. the White households possibly experience fewer eviction proceedings;
- 3. Black households were more susceptible to acute economic impacts leading to more evictions of Black households; or
- 4. Black households tend to live in urban areas where most of the legal aid organizations had pre-existing presences prior to the pandemic.

These options are not necessarily mutually exclusive.

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. 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

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,

Disaster Recovery in Texas

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.

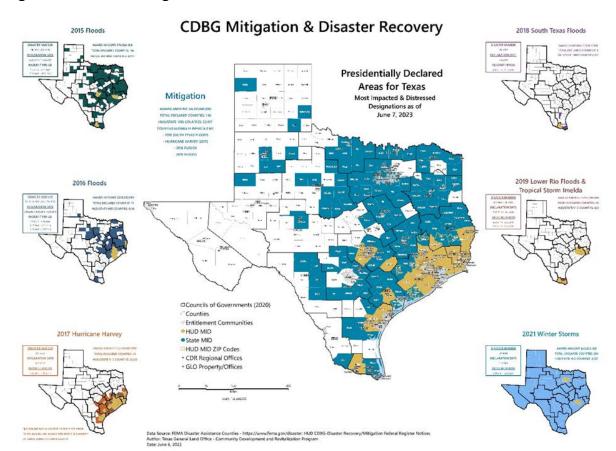


Figure 8-1: CDBG-DR Eligible Counties in Texas

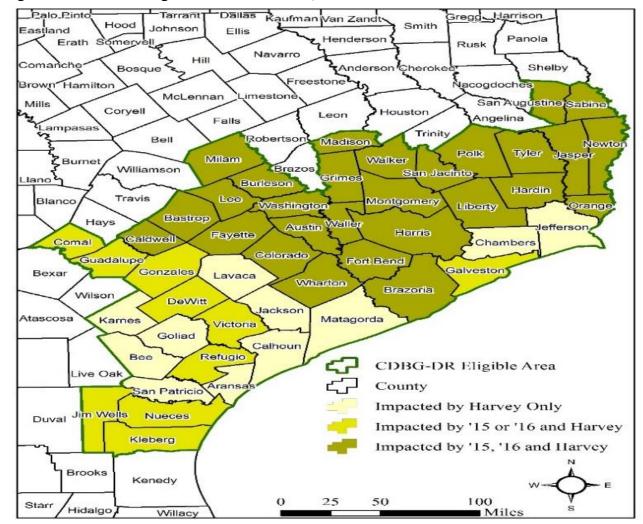


Figure 8-2: CDBG-DR Eligible Counties in Texas, Gulf Coast

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 8-3: 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:

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.

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.

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.

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.

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.

2024 State of Texas Analysis of Impediments to Fair Housing Choice

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 8-4: 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 Objective⁴³; 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
 - 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.

⁴³ (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.

- (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:

Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements.

Clearance, demolition, and removal of buildings and improvements.

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:
 - o Housing;
 - Land use and urban environmental design;
 - Economic Development;
 - Open space and recreation;
 - Energy use and conservation;
 - Floodplain and wetlands management;

- Transportation;
- o 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.

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cost-effective, prudent, secure, and allow for faster construction. After research, this study will proceed with the development of prototypes.

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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.

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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 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.

General Land Office Economic Development Activities

CDBG-DR funds may be utilized for a wide range of Economic Revitalization Activities within impacted communities. These activities include any activity that demonstrably restores and improves the local or regional economy and are not limited to activities that create or retain jobs.

In response to prior disasters, the GLO has coordinated efforts with impacted communities to conduct economic development activities to include the following:

- Provision of loans and grants to businesses.
- Provision of funding for job training.
- Building of educational facilities to teach technical job skills.

- Making improvements to commercial or retail districts in the impact area; and
- Financing other efforts that attract and retain workers in devastated communities.

Beyond this list, CDBG-DR funds are permitted to be utilized in the form of direct assistance to a small business⁴⁴ or a business that can demonstrate that the usage of grant funding is reasonable and critical to long-term recovery.

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 multifamily 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

⁴⁴ Small business as defined at 15 U.S.C. 632(a)

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 8-5: Summary of Total Unmet Need for State Allocation Program Amounts

			State Program	% of State
		% of Total	Allocation	Program
Category	Unmet Need	Unmet Need	Amount	Allocation
Housing	\$24,040,632,591	15%	\$1,823,844,297	77%

		% of Total	State Program Allocation	% of State Program
Category	Unmet Need	Unmet Need	Amount	Allocation
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 8-6: 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
			32% of Texas
Population estimates, 2016	27,862,596	8,861,831	Population
Population, percent change - April 1, 2010,			
(estimates base) to July 1, 2016	10.80%	12%	

	Texas	49 CI	49 CDBG-DR Eligible Counties	
Fact	Estimates	Estimates	Percent of Area	
			7.28% of Eligible	
Persons under 5 years, percent, 2016	7.20%	645,145	Population	
			26.17% of Eligible	
Persons under 18 years, percent, 2016	26.20%	2,319,282	Population	
			11.73% of Eligible	
Persons 65 years and over, percent, 2016	12.00%	1,039,153	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		
			62.5% of Housing	
Owner-occupied housing unit rate, 20122016	61.90%	2,152,669	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,			7.65% of Eligible	
percent, 2012-2016	8.10%	678,268	Population	
Median household income (in 2016 dollars),	0.207	0.0,200	. opanason	
2012-2016	\$54,727	\$50,145		
	. ,	14.9% of Eligible		
Persons in poverty, percent	15.60%	Population		
		•	15% of	
Land area in square miles, 2010	261,231.71	39,496	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.

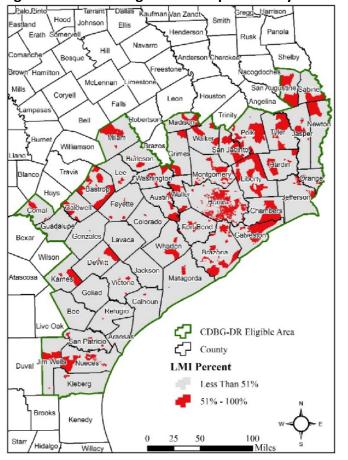


Figure 8-7: Percentage of LMI Population by Block Group (2017)

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.

Impediment 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

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process as required under the law⁴⁵. 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 examination⁴⁶;
- 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 projects⁴⁷. By consulting with adjacent units of local government, agencies with metropolitan-wide planning responsibilities, and public housing authorities, the GLO indirectly combats NIMBYism by allowing all citizens to participate and have their concerns adequately addressed.

Additionally, the GLO works to create a more inclusive disaster recovery environment for all impacted citizens by implementing programs in compliance with an extensive list of federal requirements. The GLO must certify compliance with, at a minimum, the following for each program or project it undertakes

24 CFR §570.602: Section 109 of the Act

Section 109 of the Act requires that no person in the United States shall on the grounds of race, color, national origin, religion, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance made available pursuant to the Act. This provision also states that the prohibition against discrimination on the basis of age under the Age Discrimination Act and the prohibition against discrimination on the bases of disability under Section 504 shall apply to programs or activities receiving Federal financial assistance.

⁴⁵ 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.

⁴⁶ Publication efforts must meet the effective communications requirements found at 24 CFR §8 and other fair housing and civil rights requirements.

⁴⁷ 24 CFR §91.100(a)(4) and (5).

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on a basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that are provided or the manner in which they are provided.

The Fair Housing Act

The Fair Housing Act protects people from discrimination based on race, color, national origin, religion, sex, disability and the presence of children when they are renting, buying, or securing financing for housing.

Affirmatively Furthering Fair Housing

Affirmatively Furthering Fair Housing (AFFH) requires that federal grantees further the purposes of the Fair Housing Act through the provision of an effective planning approach to aid program participants in taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

The GLO, in its' interpretation of current AFFH requirements under the law, has taken the step to conduct AFFH reviews in coordination with Texas Appleseed. This review process and all of its inner workings are being carefully crafted to ensure the most effective and efficient review process possible. To date, this review process will, at a minimum, include an assessment of the following as it relates to each project: area demography, socioeconomic characteristics, housing configuration and needs, education opportunities, access to public transportation, healthcare opportunities, and environmental hazards or concerns. It is the hope of the GLO that these reviews will present relevant data and establish solid reasoning to support the usage of CDBG-DR funds for certain recovery projects.

The GLO works to ensure that all policies, processes, and procedures associated with CDBG-DR Program implementation 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.

Impediment 2 - There is inadequate information available to local governments, stakeholders, and the public about fair housing requirements and programs to assist persons with disabilities and low-income residents.

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.

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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.

Impediment 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 HUD⁴⁸;
- 2. 24 CFR Part 3: Nondiscrimination on the Basis of Sex in Education Programs or Activities receiving Federal Financial Assistance⁴⁹;
- 3. 24 CFR Part 8: Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development⁵⁰;
- 4. 24 CFR Parts 91.325(a)(1): Affirmatively Furthering Fair Housing⁵¹; and
- 5. 24 CFR 570.487(b): Affirmatively Furthering Fair Housing⁵².

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.

⁴⁸ Implementing regulations for Title VI of the Civil Rights Act of 1964.

⁴⁹ Implementing regulations for Title IX of the Education Amendments Act of 1972.

⁵⁰ Implementing regulations for Section 504 of the Rehabilitation Act of 1973.

⁵¹ Each State must certify that they will affirmatively further fair housing.

⁵² Each state and local government must certify that it will affirmatively further fair housing.

Impediment 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, 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.

Impediment 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;

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- 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. 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 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.

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.

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 incredibly 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 2024 State of Texas Analysis of Impediments to Fair Housing Choice Page 228

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 incredibly 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 incredibly 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

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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, 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. 54 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 initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

⁵⁴ U.S. Department of Housing and Urban Development Fair Housing Assistance Programs.

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 <u>list of Fair Housing Initiative Program (FHIP) agencies in Texas</u>, 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 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 six percent 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 Al. 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 Status⁵⁵ 56

- 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.
- 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,

⁵⁵ 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.

⁵⁶ This summary of the State's current fair housing legal status was updated and recent as of January 23, 2024.

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 nondiscrimination 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 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 Public Input and 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.

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. Nationally⁵⁷, 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 Al and the 2024 Al.

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

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⁵⁷ What Different Denial Rates Can Tell Us about Racial Disparities in the Mortgage Market. Urban Institute, January 13, 2022.

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.
- 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 disability⁵⁰, 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.⁵⁸

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.

⁵⁸ American Community Survey Table B23024, 2022 5-Year Data.

- A significant portion of individuals with criminal records are members of one or more protected classes. HUD has indicated in guidance⁵⁹ 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 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.

⁵⁹ Secretary Marcia L. Fudge, U.S. Department of Housing and Urban Development. April 12, 2022.

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 Al's covered what the State, local government, and other organizations could do to mitigate impediments. This Al 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.

Impediments⁶⁰

- 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-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.

⁶⁰ See the discussion in the Impediments to Fair Housing Ch. 11 regarding the use of this term in relation to the Fair Housing Act.

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.
- 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.

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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.

Conclusions and Recommendations

- 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.

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 identify opportunities to assess the impacts and trends of the State's multifamily programs.
- 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.

Conclusions and Recommendations

- 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

Conclusions and Recommendations

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 Al 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
Al	Analysis of Impediments
AMFI	Area Median Family Income
AMI	Area Median Income
ARP	American Rescue Plan
AYBR	Amy Young Barrier Removal Program
ВНАС	Behavioral Health Advisory Committee
Bootstrap	Texas Bootstrap Loan Program
CAA	Community Action Agency
CDBG	Community Development Block Grant
CFD	Contract for Deed
СЕРВ	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
HAF	Homeowner Assistance Fund
НВА	Homebuyer Assistance

Commonly Used Acronyms

Acronym	Meaning
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
НОРА	Housing for Older Persons Act
HOPWA	Housing Opportunities for Persons with HIV/AIDS
HRA	Homeowner Rehabilitation Assistance
HSDA	HIV Service Delivery Area
HTC	Housing Tax Credit Program
HUD	United States Department of Housing and Urban Development
ICP	Inclusive Communities Project, Inc.
IDD	Intellectual and Developmental Disabilities
LEP	Limited English Proficiency
LI	Low Income
LIHTC	Low Income Housing Tax Credit Program
LMHA	Local Mental Health Authority
LMISD	Low and Moderate Income Summary Data
MF Bond	Multifamily Bond Program
MFDL	Multifamily Direct Loan Program
MFTH	My First Texas Home Program
MI	Middle Income
MSA	Metropolitan Statistical Area
NHTF	National Housing Trust Fund
NIMBY	Not in My Back Yard
PATH	Projects for Assistance in Transition from Homelessness
PHA	Public Housing Authority
PHP	Permanent Housing Placement
PJ	Participating Jurisdiction
PLWH	Persons Living with HIV
PRA	Project Rental Assistance
QAP	Qualified Allocation Plan
RFP	Request for Proposals
SAFMR	Small Area Fair Market Rent
SFD	Single Family Development
SHC	Colonia Self Help Center
SHTF	Texas State Housing Trust Fund
SLRTP	Statewide Long Range Transportation Plan

Commonly Used Acronyms

Acronym	Meaning
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
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 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of "extreme poverty" as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. This translates into the equation shown in Figure B-1: R/ECAP Formula.

Figure B-1: R/ECAP Formula

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

Where i represents census tracts, ($\mu_{PovRate}^{cbsa}$) is the metropolitan/micropolitan (CBSA) mean tract poverty rate, PovRate is the ith tract poverty rate, (NHW_i) is the non-Hispanic white population in tract i, and Pop is the population in tract i.

While this definition of R/ECAP works well for tracts in CBSAs, places outside of these geographies are unlikely to have racial or ethnic concentrations as high as 50 percent. In these areas, the racial/ethnic concentration threshold is set at 20 percent.

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

$$Diversity = \frac{(\prod_{rE=1}^{RE} (1 + P_{rE})) - (2 * E)}{(\prod_{rE=1}^{RE} (1 + \frac{1}{RF})) - (2 * E)}$$

Where:

E = the total number of racial or ethnic categories whose members (rE) are mutually exclusive.

RE = the total number of racial and ethnic groups in category E.

rE = the individual racial or ethnic group in category E.

 P_{rE} = the proportion of the population that identifies as race/ethnicity r in category E.

Diversity Index Example Case

In a simple example, an individual can be either Hispanic or Not Hispanic. There is one category of mutually exclusive ethnicities. In our example, the population will be 25% Hispanic and 75% Non-Hispanic. So in this case:

E = 1. Since E = 1, we can ignore E.

RE = 2 (Hispanic or Not Hispanic)

 $P_{Hispanic} = .25$

 $P_{Non\ Hispanic}$ = .75

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

This simplifies to:

$$\frac{2.1875 - 2}{2.25 - 2} = \frac{.1875}{.25} = .75$$

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)

 $P_{Hisnanic} = .25$

 $P_{Non\;Hispanic} = .75$

 $P_{White} = .6$

 $P_{Other} = .4$

$$\frac{((1+.25)*(1+.75)*(1+.6)*(1+.4)) - (2*2)}{((1+\frac{1}{2})*(1+\frac{1}{2})*(1+\frac{1}{2})*(1+\frac{1}{2})) - (2*2)}$$

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

Diversity Index

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

Disability

Color

• Familial status

Religion

• National origin

Sex

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 (<u>Texas Municipal League</u> or <u>Texas Association of Counties</u>) 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 <u>TWC Complaint Form</u> – <u>HousingComplaint@twc.state.tx.us</u>

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 <u>Texas Relay System</u> (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 <u>HUD's Frequently Asked Questions</u> (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>U.S. Department of Justice</u> and uses the <u>Census Bureau data</u>.

- To determine the local need for LEP services, subrecipient may use the <u>Census Bureau's</u> 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(I) 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.

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The following suggestions can be used to increase participation of small, minority- and womenowned 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 <u>Minority Business Development Centers</u> (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 partiallyfunded 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 nonconstruction 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
 - Recipient Agency: Texas Department of Agriculture
 - 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:
 - Public/non-profit organizations;
 - o Private plan rooms; or
 - o <u>Local Workforce Solutions Offices</u> (WIOA One Stop Shop), if applicable
 - 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 2024 State of Texas Analysis of Impediments to Fair Housing Choice

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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:

- "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):
 - o neighborhood-based nonprofit organizations,
 - o local development corporations,
 - nonprofit organizations serving the development needs of the communities in nonentitlement 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
 - o 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

	Caracter Countries in Texas	
County	County	
Austin	Grimes	
Aransas	Guadalupe	
Bastrop	Hardin	
Bee	Harris	
Brazoria	Jackson	
Burleson	Jasper	
Caldwell	Jefferson	
Calhoun	Jim Wells	
Chambers	Karnes	
Colorado	Kleberg	
Comal	Lavaca	
DeWitt	Lee	
Fayette	Liberty	
Fort Bend	Madison	
Galveston	Matagorda	
Goliad	Milam	
Gonzales	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
1	Anderson
1	Bowie
1	Camp
1	Cass
1	Cherokee
1	Collin
1	Cooke
1	Dallas
1	Delta
1	Denton
1	Ellis
1	Erath
1	Fannin
1	Franklin
1	Grayson
1	Gregg
1	Harrison
1	Henderson
1	Hood
1	Hopkins
1	Hunt
1	Johnson
1	Kaufman
1	Lamar
1	Marion
1	Morris
1	Panola
1	Navarro
1	Palo Pinto
1	Parker
1	Rains
1	Red River
1	Rockwall
1	Rusk
1	Smith
1	Somervell
1	Tarrant

TDEM Region	County
1	Titus
1	Upshur
1	Van Zandt
1	Wise
1	Wood
2	Angelina
2	Austin
2	Brazoria
2	Brazos
2	Burleson
2	Chambers
2	Colorado
2	Fort Bend
2	Galveston
2	Grimes
2	Hardin
2	Harris
2	Houston
2	Jasper
2	Jefferson
2	Leon
2	Liberty
2	Madison
2	Matagorda
2	Montgomery
2	Nacogdoches
2	Newton
2	Orange
2	Polk
2	Robertson
2	Sabine
2	San Augustine
2	San Jacinto
2	Shelby
2	Trinity
2	Tyler
2	Walker

TDEM Region	County
2	Waller
2	Washington
2	Wharton
3	Aransas
3	Bee
3	Brooks
3	Cameron
3	Dimmit
3	Duval
3	Edwards
3	Hidalgo
3	Jim Hogg
3	Jim Wells
3	Kenedy
3	Kinney
3	Kleberg
3	LaSalle
3	Live Oak
3	Maverick
3	Nueces
3	Real
3	Refugio
3	San Patricio
3	Starr
3	Webb
3	Willacy
3	Uvalde
3	Val Verde
3	Zapata
3	Zavala
4	Andrews
4	Borden
4	Brewster
4	Coke
4	Concho
4	Crane
4	Crockett
4	Culberson

TDEM Region	County
4	Dawson
4	Ector
4	El Paso
4	Gaines
4	Glasscock
4	Howard
4	Hudspeth
4	Irion
4	Jeff Davis
4	Kimble
4	Loving
4	Mason
4	Martin
4	McCulloch
4	Menard
4	Midland
4	Pecos
4	Presidio
4	Reagan
4	Reeves
4	Schleicher
4	Sterling
4	Sutton
4	Terrell
4	Tom Green
4	Upton
4	Ward
4	Winkler
5	Archer
5	Armstrong
5	Bailey
5	Baylor
5	Briscoe
5	Brown
5	Callahan
5	Carson
5	Castro
5	Clay

TDEM Region	County
5	Childress
5	Cochran
5	Coleman
5	Collingsworth
5	Comanche
5	Cottle
5	Crosby
5	Dallam
5	Deaf Smith
5	Dickens
5	Donley
5	Eastland
5	Fisher
5	Floyd
5	Foard
5	Garza
5	Gray
5	Hale
5	Hall
5	Hansford
5	Hardeman
5	Hartley
5	Haskell
5	Hemphill
5	Hockley
5	Hutchinson
5	Jack
5	Jones
5	Kent
5	King
5	Knox
5	Lamb
5	Lipscomb
5	Lubbock
5	Lynn
5	Mitchell
5	Montague
5	Moore

County
Motley
Nolan
Ochiltree
Oldham
Parmer
Potter
Randall
Roberts
Runnels
Scurry
Shackleford
Sherman
Stephens
Stonewall
Swisher
Taylor
Terry
Throckmorton
Wheeler
Wichita
Wilbarger
Yoakum
Young
Atascosa
Bandera
Bastrop
Bell
Bexar
Blanco
Bosque
Burnet
Caldwell
Calhoun
Comal
Coryell
DeWitt
Falls

TDEM Region	County
6	Freestone
6	Frio
6	Gillespie
6	Goliad
6	Gonzales
6	Guadalupe
6	Hamilton
6	Hays
6	Hill
6	Jackson
6	Karnes
6	Kendall
6	Kerr
6	Lampasas
6	Lavaca
6	Lee
6	Limestone
6	Llano
6	McMullen
6	Medina
6	Milam
6	Mills
6	McLennan
6	San Saba
6	Travis
6	Victoria
6	Williamson
6	Wilson

Source: <u>Texas Department of Public Safety</u>, <u>Texas Division of Emergency Management</u>.

Figure E-3: Low or Moderate Income in Census Block Groups in Texas, 2017

Figure E-3: Low o	or Moderate Income in Census Block Groups in Texas, 2017	T
		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
480157604001	Block Group 1, Census Tract 7604, Austin County, Texas	25.1%
480157604002	Block Group 2, Census Tract 7604, Austin County, Texas	28.0%

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		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
480396641001	Block Group 1, Census Tract 6641, Brazoria County, Texas	66.9%
480396641002	Block Group 2, Census Tract 6641, Brazoria County, Texas	45.2%
480396641003	Block Group 3, Census Tract 6641, Brazoria County, Texas	48.0%
480396641004	Block Group 4, Census Tract 6641, Brazoria County, Texas	25.0%
480396641005	Block Group 5, Census Tract 6641, Brazoria County, Texas	49.8%
480396642001	Block Group 1, Census Tract 6642, Brazoria County, Texas	79.1%
480396642002	Block Group 2, Census Tract 6642, Brazoria County, Texas	52.0%
480396642003	Block Group 3, Census Tract 6642, Brazoria County, Texas	54.2%
480396643001	Block Group 1, Census Tract 6643, Brazoria County, Texas	79.2%
480396643002	Block Group 2, Census Tract 6643, Brazoria County, Texas	74.0%
480396643003	Block Group 3, Census Tract 6643, Brazoria County, Texas	56.0%
480396643004	Block Group 4, Census Tract 6643, Brazoria County, Texas	82.0%
480396643005	Block Group 5, Census Tract 6643, Brazoria County, Texas	53.9%
480396644001	Block Group 1, Census Tract 6644, Brazoria County, Texas	68.0%
480396644002	Block Group 2, Census Tract 6644, Brazoria County, Texas	37.0%
480396644003	Block Group 3, Census Tract 6644, Brazoria County, Texas	63.9%
480396644004	Block Group 4, Census Tract 6644, Brazoria County, Texas	78.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
480519703003	Block Group 3, Census Tract 9703, Burleson County, Texas	52.5%
480519704001	Block Group 1, Census Tract 9704, Burleson County, Texas	47.3%
480519704002	Block Group 2, Census Tract 9704, Burleson County, Texas	48.2%
480519705001	Block Group 1, Census Tract 9705, Burleson County, Texas	63.6%
480519705002	Block Group 2, Census Tract 9705, Burleson County, Texas	32.4%
480519705003	Block Group 3, Census Tract 9705, Burleson County, Texas	45.4%
480519705004	Block Group 4, Census Tract 9705, Burleson County, Texas	46.2%
480559601011	Block Group 1, Census Tract 9601.01, Caldwell County, Texas	43.1%
480559601012	Block Group 2, Census Tract 9601.01, Caldwell County, Texas	46.9%
480559601013	Block Group 3, Census Tract 9601.01, Caldwell County, Texas	47.7%
480559601021	Block Group 1, Census Tract 9601.02, Caldwell County, Texas	43.8%
480559601022	Block Group 2, Census Tract 9601.02, Caldwell County, Texas	37.6%
480559602001	Block Group 1, Census Tract 9602, Caldwell County, Texas	50.0%
480559602002	Block Group 2, Census Tract 9602, Caldwell County, Texas	46.6%
480559602003	Block Group 3, Census Tract 9602, Caldwell County, Texas	62.3%
480559602004	Block Group 4, Census Tract 9602, Caldwell County, Texas	74.9%
480559603001	Block Group 1, Census Tract 9603, Caldwell County, Texas	30.4%
480559603002	Block Group 2, Census Tract 9603, Caldwell County, Texas	69.8%
480559603003	Block Group 3, Census Tract 9603, Caldwell County, Texas	49.3%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
480570001001	Block Group 1, Census Tract 1, Calhoun County, Texas	17.3%
480570001002	Block Group 2, Census Tract 1, Calhoun County, Texas	21.7%
480570001003	Block Group 3, Census Tract 1, Calhoun County, Texas	74.4%
480570002001	Block Group 1, Census Tract 2, Calhoun County, Texas	73.1%
480570002002	Block Group 2, Census Tract 2, Calhoun County, Texas	43.4%
480570002003	Block Group 3, Census Tract 2, Calhoun County, Texas	67.4%
480570002004	Block Group 4, Census Tract 2, Calhoun County, Texas	20.1%
480570003001	Block Group 1, Census Tract 3, Calhoun County, Texas	31.1%
480570003002	Block Group 2, Census Tract 3, Calhoun County, Texas	30.0%
480570004001	Block Group 1, Census Tract 4, Calhoun County, Texas	44.2%
480570004002	Block Group 2, Census Tract 4, Calhoun County, Texas	41.8%
480570004003	Block Group 3, Census Tract 4, Calhoun County, Texas	28.9%
480570004004	Block Group 4, Census Tract 4, Calhoun County, Texas	45.5%
480570005001	Block Group 1, Census Tract 5, Calhoun County, Texas	36.4%
480570005002	Block Group 2, Census Tract 5, Calhoun County, Texas	27.9%
480570005003	Block Group 3, Census Tract 5, Calhoun County, Texas	40.4%
480570005004	Block Group 4, Census Tract 5, Calhoun County, Texas	43.9%
480579900000	Block Group 0, Census Tract 9900, Calhoun County, Texas	0.0%
480717101001	Block Group 1, Census Tract 7101, Chambers County, Texas	41.1%
480717101002	Block Group 2, Census Tract 7101, Chambers County, Texas	19.7%
480717101003	Block Group 3, Census Tract 7101, Chambers County, Texas	26.4%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
480717104014	Block Group 4, Census Tract 7104.01, Chambers County, Texas	37.7%
480717105001	Block Group 1, Census Tract 7105, Chambers County, Texas	48.2%
480717105002	Block Group 2, Census Tract 7105, Chambers County, Texas	56.9%
480717105003	Block Group 3, Census Tract 7105, Chambers County, Texas	34.2%
480717106001	Block Group 1, Census Tract 7106, Chambers County, Texas	0.0%
480719900000	Block Group 0, Census Tract 9900, Chambers County, Texas	0.0%
480897501001	Block Group 1, Census Tract 7501, Colorado County, Texas	88.6%
480897501002	Block Group 2, Census Tract 7501, Colorado County, Texas	35.9%
480897501003	Block Group 3, Census Tract 7501, Colorado County, Texas	24.0%
480897501004	Block Group 4, Census Tract 7501, Colorado County, Texas	41.3%
480897502001	Block Group 1, Census Tract 7502, Colorado County, Texas	42.0%
480897502002	Block Group 2, Census Tract 7502, Colorado County, Texas	50.8%
480897503001	Block Group 1, Census Tract 7503, Colorado County, Texas	32.5%
480897503002	Block Group 2, Census Tract 7503, Colorado County, Texas	37.0%
480897503003	Block Group 3, Census Tract 7503, Colorado County, Texas	44.5%
480897503004	Block Group 4, Census Tract 7503, Colorado County, Texas	41.6%
480897504001	Block Group 1, Census Tract 7504, Colorado County, Texas	29.0%
480897504002	Block Group 2, Census Tract 7504, Colorado County, Texas	22.2%
480897504003	Block Group 3, Census Tract 7504, Colorado County, Texas	26.4%
480897504004	Block Group 4, Census Tract 7504, Colorado County, Texas	30.8%
480897505001	Block Group 1, Census Tract 7505, Colorado County, Texas	42.7%
480897505002	Block Group 2, Census Tract 7505, Colorado County, Texas	29.1%
480897505003	Block Group 3, Census Tract 7505, Colorado County, Texas	51.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
480913103002	Block Group 2, Census Tract 3103, Comal County, Texas	26.5%
480913103003	Block Group 3, Census Tract 3103, Comal County, Texas	45.1%
480913103004	Block Group 4, Census Tract 3103, Comal County, Texas	38.4%
480913104011	Block Group 1, Census Tract 3104.01, Comal County, Texas	50.9%
480913104012	Block Group 2, Census Tract 3104.01, Comal County, Texas	82.5%
480913104013	Block Group 3, Census Tract 3104.01, Comal County, Texas	62.5%
480913104014	Block Group 4, Census Tract 3104.01, Comal County, Texas	64.9%
480913104015	Block Group 5, Census Tract 3104.01, Comal County, Texas	54.2%
480913104016	Block Group 6, Census Tract 3104.01, Comal County, Texas	53.8%
480913104031	Block Group 1, Census Tract 3104.03, Comal County, Texas	11.9%
480913104032	Block Group 2, Census Tract 3104.03, Comal County, Texas	62.0%
480913104033	Block Group 3, Census Tract 3104.03, Comal County, Texas	39.9%
480913104041	Block Group 1, Census Tract 3104.04, Comal County, Texas	37.4%
480913104042	Block Group 2, Census Tract 3104.04, Comal County, Texas	33.3%
480913105011	Block Group 1, Census Tract 3105.01, Comal County, Texas	60.4%
480913105012	Block Group 2, Census Tract 3105.01, Comal County, Texas	49.1%
480913105021	Block Group 1, Census Tract 3105.02, Comal County, Texas	42.4%
480913105022	Block Group 2, Census Tract 3105.02, Comal County, Texas	41.7%
480913105031	Block Group 1, Census Tract 3105.03, Comal County, Texas	17.2%
480913105032	Block Group 2, Census Tract 3105.03, Comal County, Texas	19.4%
480913106031	Block Group 1, Census Tract 3106.03, Comal County, Texas	21.5%
480913106032	Block Group 2, Census Tract 3106.03, Comal County, Texas	12.4%
480913106041	Block Group 1, Census Tract 3106.04, Comal County, Texas	16.9%
480913106042	Block Group 2, Census Tract 3106.04, Comal County, Texas	31.4%
480913106051	Block Group 1, Census Tract 3106.05, Comal County, Texas	53.6%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
480913106082	Block Group 2, Census Tract 3106.08, Comal County, Texas	56.6%
480913107011	Block Group 1, Census Tract 3107.01, Comal County, Texas	6.8%
480913107012	Block Group 2, Census Tract 3107.01, Comal County, Texas	12.5%
480913107013	Block Group 3, Census Tract 3107.01, Comal County, Texas	6.1%
480913107021	Block Group 1, Census Tract 3107.02, Comal County, Texas	13.6%
480913107022	Block Group 2, Census Tract 3107.02, Comal County, Texas	15.5%
480913107031	Block Group 1, Census Tract 3107.03, Comal County, Texas	23.1%
480913107032	Block Group 2, Census Tract 3107.03, Comal County, Texas	9.9%
480913107033	Block Group 3, Census Tract 3107.03, Comal County, Texas	23.1%
480913107041	Block Group 1, Census Tract 3107.04, Comal County, Texas	7.2%
480913107042	Block Group 2, Census Tract 3107.04, Comal County, Texas	31.0%
480913107043	Block Group 3, Census Tract 3107.04, Comal County, Texas	33.0%
480913107044	Block Group 4, Census Tract 3107.04, Comal County, Texas	31.7%
480913108011	Block Group 1, Census Tract 3108.01, Comal County, Texas	10.0%
480913108012	Block Group 2, Census Tract 3108.01, Comal County, Texas	4.0%
480913108013	Block Group 3, Census Tract 3108.01, Comal County, Texas	5.3%
480913108021	Block Group 1, Census Tract 3108.02, Comal County, Texas	14.6%
480913108022	Block Group 2, Census Tract 3108.02, Comal County, Texas	49.6%
480913109011	Block Group 1, Census Tract 3109.01, Comal County, Texas	9.9%
480913109012	Block Group 2, Census Tract 3109.01, Comal County, Texas	13.0%
480913109021	Block Group 1, Census Tract 3109.02, Comal County, Texas	27.9%
480913109022	Block Group 2, Census Tract 3109.02, Comal County, Texas	16.3%
480913109031	Block Group 1, Census Tract 3109.03, Comal County, Texas	11.8%
480913109032	Block Group 2, Census Tract 3109.03, Comal County, Texas	13.4%
481239701001	Block Group 1, Census Tract 9701, DeWitt County, Texas	43.5%
481239701002	Block Group 2, Census Tract 9701, DeWitt County, Texas	40.8%
481239701003	Block Group 3, Census Tract 9701, DeWitt County, Texas	56.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481239703002	Block Group 2, Census Tract 9703, DeWitt County, Texas	31.4%
481239703003	Block Group 3, Census Tract 9703, DeWitt County, Texas	37.5%
481239703004	Block Group 4, Census Tract 9703, DeWitt County, Texas	18.1%
481239704001	Block Group 1, Census Tract 9704, DeWitt County, Texas	31.6%
481239704002	Block Group 2, Census Tract 9704, DeWitt County, Texas	28.3%
481239704003	Block Group 3, Census Tract 9704, DeWitt County, Texas	43.1%
481239705001	Block Group 1, Census Tract 9705, DeWitt County, Texas	21.0%
481239705002	Block Group 2, Census Tract 9705, DeWitt County, Texas	43.9%
481239705003	Block Group 3, Census Tract 9705, DeWitt County, Texas	35.8%
481499701001	Block Group 1, Census Tract 9701, Fayette County, Texas	23.4%
481499701002	Block Group 2, Census Tract 9701, Fayette County, Texas	35.2%
481499702001	Block Group 1, Census Tract 9702, Fayette County, Texas	30.7%
481499702002	Block Group 2, Census Tract 9702, Fayette County, Texas	11.3%
481499702003	Block Group 3, Census Tract 9702, Fayette County, Texas	25.2%
481499703001	Block Group 1, Census Tract 9703, Fayette County, Texas	46.4%
481499703002	Block Group 2, Census Tract 9703, Fayette County, Texas	49.3%
481499703003	Block Group 3, Census Tract 9703, Fayette County, Texas	46.0%
481499703004	Block Group 4, Census Tract 9703, Fayette County, Texas	62.0%
481499703005	Block Group 5, Census Tract 9703, Fayette County, Texas	55.0%
481499703006	Block Group 6, Census Tract 9703, Fayette County, Texas	72.5%
481499703007	Block Group 7, Census Tract 9703, Fayette County, Texas	31.3%
481499704001	Block Group 1, Census Tract 9704, Fayette County, Texas	16.5%
481499704002	Block Group 2, Census Tract 9704, Fayette County, Texas	18.7%
481499704003	Block Group 3, Census Tract 9704, Fayette County, Texas	38.7%
481499705001	Block Group 1, Census Tract 9705, Fayette County, Texas	17.4%
481499705002	Block Group 2, Census Tract 9705, Fayette County, Texas	10.8%
481499705003	Block Group 3, Census Tract 9705, Fayette County, Texas	56.6%
481499706001	Block Group 1, Census Tract 9706, Fayette County, Texas	47.4%
481499706002	Block Group 2, Census Tract 9706, Fayette County, Texas	35.9%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481576709013	Block Group 3, Census Tract 6709.01, Fort Bend County, Texas	14.9%
481576709021	Block Group 1, Census Tract 6709.02, Fort Bend County, Texas	22.9%
481576709022	Block Group 2, Census Tract 6709.02, Fort Bend County, Texas	29.3%
481576710011	Block Group 1, Census Tract 6710.01, Fort Bend County, Texas	23.6%
481576710012	Block Group 2, Census Tract 6710.01, Fort Bend County, Texas	29.3%
481576710013	Block Group 3, Census Tract 6710.01, Fort Bend County, Texas	16.3%
481576710014	Block Group 4, Census Tract 6710.01, Fort Bend County, Texas	12.1%
481576710021	Block Group 1, Census Tract 6710.02, Fort Bend County, Texas	16.2%
481576710022	Block Group 2, Census Tract 6710.02, Fort Bend County, Texas	3.5%
481576710023	Block Group 3, Census Tract 6710.02, Fort Bend County, Texas	30.6%
481576710024	Block Group 4, Census Tract 6710.02, Fort Bend County, Texas	25.3%
481576711001	Block Group 1, Census Tract 6711, Fort Bend County, Texas	54.8%
481576711002	Block Group 2, Census Tract 6711, Fort Bend County, Texas	57.1%
481576711003	Block Group 3, Census Tract 6711, Fort Bend County, Texas	72.9%
481576711004	Block Group 4, Census Tract 6711, Fort Bend County, Texas	26.3%
481576712001	Block Group 1, Census Tract 6712, Fort Bend County, Texas	37.4%
481576712002	Block Group 2, Census Tract 6712, Fort Bend County, Texas	52.5%
481576713001	Block Group 1, Census Tract 6713, Fort Bend County, Texas	66.2%
481576713002	Block Group 2, Census Tract 6713, Fort Bend County, Texas	42.5%
481576714001	Block Group 1, Census Tract 6714, Fort Bend County, Texas	41.8%
481576714002	Block Group 2, Census Tract 6714, Fort Bend County, Texas	35.7%
481576715011	Block Group 1, Census Tract 6715.01, Fort Bend County, Texas	24.0%
481576715012	Block Group 2, Census Tract 6715.01, Fort Bend County, Texas	8.7%
481576715013	Block Group 3, Census Tract 6715.01, Fort Bend County, Texas	6.0%
481576715014	Block Group 4, Census Tract 6715.01, Fort Bend County, Texas	11.3%
481576715021	Block Group 1, Census Tract 6715.02, Fort Bend County, Texas	39.4%
481576716011	Block Group 1, Census Tract 6716.01, Fort Bend County, Texas	37.4%
481576716012	Block Group 2, Census Tract 6716.01, Fort Bend County, Texas	35.9%
481576716013	Block Group 3, Census Tract 6716.01, Fort Bend County, Texas	1.9%
481576716014	Block Group 4, Census Tract 6716.01, Fort Bend County, Texas	17.3%
481576716021	Block Group 1, Census Tract 6716.02, Fort Bend County, Texas	17.2%
481576716022	Block Group 2, Census Tract 6716.02, Fort Bend County, Texas	7.7%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481677221002	Block Group 2, Census Tract 7221, Galveston County, Texas	34.9%
481677221003	Block Group 3, Census Tract 7221, Galveston County, Texas	32.7%
481677221004	Block Group 4, Census Tract 7221, Galveston County, Texas	31.8%
481677221005	Block Group 5, Census Tract 7221, Galveston County, Texas	35.1%
481677221006	Block Group 6, Census Tract 7221, Galveston County, Texas	32.2%
481677222001	Block Group 1, Census Tract 7222, Galveston County, Texas	46.8%
481677222002	Block Group 2, Census Tract 7222, Galveston County, Texas	75.8%
481677222003	Block Group 3, Census Tract 7222, Galveston County, Texas	79.2%
481677222004	Block Group 4, Census Tract 7222, Galveston County, Texas	90.6%
481677223001	Block Group 1, Census Tract 7223, Galveston County, Texas	82.6%
481677223002	Block Group 2, Census Tract 7223, Galveston County, Texas	79.2%
481677223003	Block Group 3, Census Tract 7223, Galveston County, Texas	88.2%
481677223004	Block Group 4, Census Tract 7223, Galveston County, Texas	57.7%
481677223005	Block Group 5, Census Tract 7223, Galveston County, Texas	62.4%
481677223006	Block Group 6, Census Tract 7223, Galveston County, Texas	23.4%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481677233001	Block Group 1, Census Tract 7233, Galveston County, Texas	35.8%
481677233002	Block Group 2, Census Tract 7233, Galveston County, Texas	8.8%
481677233003	Block Group 3, Census Tract 7233, Galveston County, Texas	14.5%
481677234001	Block Group 1, Census Tract 7234, Galveston County, Texas	34.4%
481677234002	Block Group 2, Census Tract 7234, Galveston County, Texas	21.2%
481677234003	Block Group 3, Census Tract 7234, Galveston County, Texas	4.1%
481677234004	Block Group 4, Census Tract 7234, Galveston County, Texas	25.6%
481677235011	Block Group 1, Census Tract 7235.01, Galveston County, Texas	57.1%
481677235012	Block Group 2, Census Tract 7235.01, Galveston County, Texas	60.7%
481677235021	Block Group 1, Census Tract 7235.02, Galveston County, Texas	33.6%
481677235022	Block Group 2, Census Tract 7235.02, Galveston County, Texas	29.5%
481677235023	Block Group 3, Census Tract 7235.02, Galveston County, Texas	34.8%
481677235024	Block Group 4, Census Tract 7235.02, Galveston County, Texas	29.6%
481677236001	Block Group 1, Census Tract 7236, Galveston County, Texas	50.3%
481677236002	Block Group 2, Census Tract 7236, Galveston County, Texas	36.6%
481677236003	Block Group 3, Census Tract 7236, Galveston County, Texas	31.4%
481677237001	Block Group 1, Census Tract 7237, Galveston County, Texas	70.1%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481677243001	Block Group 1, Census Tract 7243, Galveston County, Texas	59.3%
481677243002	Block Group 2, Census Tract 7243, Galveston County, Texas	69.6%
481677243003	Block Group 3, Census Tract 7243, Galveston County, Texas	46.6%
481677243004	Block Group 4, Census Tract 7243, Galveston County, Texas	53.2%
481677243005	Block Group 5, Census Tract 7243, Galveston County, Texas	64.0%
481677244001	Block Group 1, Census Tract 7244, Galveston County, Texas	57.6%
481677244002	Block Group 2, Census Tract 7244, Galveston County, Texas	68.9%
481677244003	Block Group 3, Census Tract 7244, Galveston County, Texas	85.1%
481677244004	Block Group 4, Census Tract 7244, Galveston County, Texas	68.2%
481677245001	Block Group 1, Census Tract 7245, Galveston County, Texas	39.3%
481677246001	Block Group 1, Census Tract 7246, Galveston County, Texas	100.0%
481677246002	Block Group 2, Census Tract 7246, Galveston County, Texas	74.6%
481677247001	Block Group 1, Census Tract 7247, Galveston County, Texas	59.8%
481677247002	Block Group 2, Census Tract 7247, Galveston County, Texas	66.2%
481677248001	Block Group 1, Census Tract 7248, Galveston County, Texas	51.4%
481677248002	Block Group 2, Census Tract 7248, Galveston County, Texas	50.4%
481677249001	Block Group 1, Census Tract 7249, Galveston County, Texas	59.4%
481677249002	Block Group 2, Census Tract 7249, Galveston County, Texas	64.2%
481677249003	Block Group 3, Census Tract 7249, Galveston County, Texas	62.2%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481677254004	Block Group 4, Census Tract 7254, Galveston County, Texas	52.8%
481677255001	Block Group 1, Census Tract 7255, Galveston County, Texas	17.3%
481677255002	Block Group 2, Census Tract 7255, Galveston County, Texas	25.0%
481677256001	Block Group 1, Census Tract 7256, Galveston County, Texas	61.1%
481677256002	Block Group 2, Census Tract 7256, Galveston County, Texas	69.1%
481677256003	Block Group 3, Census Tract 7256, Galveston County, Texas	66.5%
481677256004	Block Group 4, Census Tract 7256, Galveston County, Texas	80.8%
481677257001	Block Group 1, Census Tract 7257, Galveston County, Texas	33.2%
481677257002	Block Group 2, Census Tract 7257, Galveston County, Texas	22.0%
481677258001	Block Group 1, Census Tract 7258, Galveston County, Texas	45.2%
481677258002	Block Group 2, Census Tract 7258, Galveston County, Texas	59.0%
481677258003	Block Group 3, Census Tract 7258, Galveston County, Texas	58.3%
481677259001	Block Group 1, Census Tract 7259, Galveston County, Texas	18.8%
481677259002	Block Group 2, Census Tract 7259, Galveston County, Texas	66.4%
481677260001	Block Group 1, Census Tract 7260, Galveston County, Texas	30.4%
481677260002	Block Group 2, Census Tract 7260, Galveston County, Texas	23.8%
481677261001	Block Group 1, Census Tract 7261, Galveston County, Texas	40.4%
481677261002	Block Group 2, Census Tract 7261, Galveston County, Texas	25.3%
481677262001	Block Group 1, Census Tract 7262, Galveston County, Texas	78.5%
481677262002	Block Group 2, Census Tract 7262, Galveston County, Texas	63.2%
481679900000	Block Group 0, Census Tract 9900, Galveston County, Texas	0.0%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481770003001	Block Group 1, Census Tract 3, Gonzales County, Texas	71.9%
481770003002	Block Group 2, Census Tract 3, Gonzales County, Texas	43.1%
481770003003	Block Group 3, Census Tract 3, Gonzales County, Texas	58.1%
481770003004	Block Group 4, Census Tract 3, Gonzales County, Texas	68.5%
481770004001	Block Group 1, Census Tract 4, Gonzales County, Texas	42.6%
481770004002	Block Group 2, Census Tract 4, Gonzales County, Texas	23.4%
481770005001	Block Group 1, Census Tract 5, Gonzales County, Texas	46.1%
481770005002	Block Group 2, Census Tract 5, Gonzales County, Texas	47.6%
481770005003	Block Group 3, Census Tract 5, Gonzales County, Texas	71.7%
481770006001	Block Group 1, Census Tract 6, Gonzales County, Texas	42.3%
481770006002	Block Group 2, Census Tract 6, Gonzales County, Texas	35.3%
481851801011	Block Group 1, Census Tract 1801.01, Grimes County, Texas	61.9%
481851801012	Block Group 2, Census Tract 1801.01, Grimes County, Texas	57.4%
481851801013	Block Group 3, Census Tract 1801.01, Grimes County, Texas	60.9%
481851801021	Block Group 1, Census Tract 1801.02, Grimes County, Texas	40.1%
481851801022	Block Group 2, Census Tract 1801.02, Grimes County, Texas	50.2%
481851801023	Block Group 3, Census Tract 1801.02, Grimes County, Texas	40.1%
481851802001	Block Group 1, Census Tract 1802, Grimes County, Texas	35.3%
481851802002	Block Group 2, Census Tract 1802, Grimes County, Texas	31.9%
481851802003	Block Group 3, Census Tract 1802, Grimes County, Texas	36.7%
481851802004	Block Group 4, Census Tract 1802, Grimes County, Texas	40.4%
481851802005	Block Group 5, Census Tract 1802, Grimes County, Texas	22.9%
481851803011	Block Group 1, Census Tract 1803.01, Grimes County, Texas	38.6%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481872101004	Block Group 4, Census Tract 2101, Guadalupe County, Texas	36.0%
481872102001	Block Group 1, Census Tract 2102, Guadalupe County, Texas	93.4%
481872102002	Block Group 2, Census Tract 2102, Guadalupe County, Texas	86.0%
481872102003	Block Group 3, Census Tract 2102, Guadalupe County, Texas	83.7%
481872102004	Block Group 4, Census Tract 2102, Guadalupe County, Texas	70.9%
481872103001	Block Group 1, Census Tract 2103, Guadalupe County, Texas	78.8%
481872103002	Block Group 2, Census Tract 2103, Guadalupe County, Texas	77.9%
481872103003	Block Group 3, Census Tract 2103, Guadalupe County, Texas	61.5%
481872103004	Block Group 4, Census Tract 2103, Guadalupe County, Texas	63.9%
481872103005	Block Group 5, Census Tract 2103, Guadalupe County, Texas	43.6%
481872104001	Block Group 1, Census Tract 2104, Guadalupe County, Texas	30.1%
481872104002	Block Group 2, Census Tract 2104, Guadalupe County, Texas	65.4%
481872104003	Block Group 3, Census Tract 2104, Guadalupe County, Texas	29.6%
481872105041	Block Group 1, Census Tract 2105.04, Guadalupe County, Texas	29.0%
481872105042	Block Group 2, Census Tract 2105.04, Guadalupe County, Texas	33.8%
481872105051	Block Group 1, Census Tract 2105.05, Guadalupe County, Texas	49.0%
481872105052	Block Group 2, Census Tract 2105.05, Guadalupe County, Texas	51.6%
481872105061	Block Group 1, Census Tract 2105.06, Guadalupe County, Texas	44.8%
481872105062	Block Group 2, Census Tract 2105.06, Guadalupe County, Texas	37.8%
481872105071	Block Group 1, Census Tract 2105.07, Guadalupe County, Texas	28.3%
481872105072	Block Group 2, Census Tract 2105.07, Guadalupe County, Texas	27.5%
481872105081	Block Group 1, Census Tract 2105.08, Guadalupe County, Texas	41.8%
481872105082	Block Group 2, Census Tract 2105.08, Guadalupe County, Texas	19.8%
481872106031	Block Group 1, Census Tract 2106.03, Guadalupe County, Texas	31.7%
481872106032	Block Group 2, Census Tract 2106.03, Guadalupe County, Texas	61.4%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481872108041	Block Group 1, Census Tract 2108.04, Guadalupe County, Texas	31.8%
481872108042	Block Group 2, Census Tract 2108.04, Guadalupe County, Texas	37.0%
481872109011	Block Group 1, Census Tract 2109.01, Guadalupe County, Texas	31.1%
481872109012	Block Group 2, Census Tract 2109.01, Guadalupe County, Texas	38.5%
481872109013	Block Group 3, Census Tract 2109.01, Guadalupe County, Texas	44.1%
481872109021	Block Group 1, Census Tract 2109.02, Guadalupe County, Texas	27.6%
481872109022	Block Group 2, Census Tract 2109.02, Guadalupe County, Texas	45.2%
481990301001	Block Group 1, Census Tract 301, Hardin County, Texas	15.1%
481990301002	Block Group 2, Census Tract 301, Hardin County, Texas	52.4%
481990301003	Block Group 3, Census Tract 301, Hardin County, Texas	35.6%
481990302001	Block Group 1, Census Tract 302, Hardin County, Texas	10.0%
481990302002	Block Group 2, Census Tract 302, Hardin County, Texas	41.4%
481990302003	Block Group 3, Census Tract 302, Hardin County, Texas	31.9%
481990303001	Block Group 1, Census Tract 303, Hardin County, Texas	32.6%
481990303002	Block Group 2, Census Tract 303, Hardin County, Texas	29.2%
481990303003	Block Group 3, Census Tract 303, Hardin County, Texas	11.9%
481990303004	Block Group 4, Census Tract 303, Hardin County, Texas	12.3%
481990304001	Block Group 1, Census Tract 304, Hardin County, Texas	44.2%
481990304002	Block Group 2, Census Tract 304, Hardin County, Texas	71.0%
481990304003	Block Group 3, Census Tract 304, Hardin County, Texas	32.1%
481990305011	Block Group 1, Census Tract 305.01, Hardin County, Texas	11.1%
481990305012	Block Group 2, Census Tract 305.01, Hardin County, Texas	15.0%
481990305021	Block Group 1, Census Tract 305.02, Hardin County, Texas	26.3%
481990305022	Block Group 2, Census Tract 305.02, Hardin County, Texas	29.5%
481990305023	Block Group 3, Census Tract 305.02, Hardin County, Texas	24.8%
481990305024	Block Group 4, Census Tract 305.02, Hardin County, Texas	25.7%
481990305025	Block Group 5, Census Tract 305.02, Hardin County, Texas	31.4%
481990306001	Block Group 1, Census Tract 306, Hardin County, Texas	23.8%
481990306002	Block Group 2, Census Tract 306, Hardin County, Texas	23.2%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
481990308001	Block Group 1, Census Tract 308, Hardin County, Texas	59.0%
481990308002	Block Group 2, Census Tract 308, Hardin County, Texas	23.0%
481990308003	Block Group 3, Census Tract 308, Hardin County, Texas	40.1%
481990308004	Block Group 4, Census Tract 308, Hardin County, Texas	57.5%
481990308005	Block Group 5, Census Tract 308, Hardin County, Texas	14.1%
481990308006	Block Group 6, Census Tract 308, Hardin County, Texas	28.2%
481990309001	Block Group 1, Census Tract 309, Hardin County, Texas	37.7%
481990309002	Block Group 2, Census Tract 309, Hardin County, Texas	35.2%
481990309003	Block Group 3, Census Tract 309, Hardin County, Texas	17.6%
481990310001	Block Group 1, Census Tract 310, Hardin County, Texas	60.8%
481990310002	Block Group 2, Census Tract 310, Hardin County, Texas	25.3%
481990310003	Block Group 3, Census Tract 310, Hardin County, Texas	36.2%
482011000001	Block Group 1, Census Tract 1000, Harris County, Texas	55.7%
482011000002	Block Group 2, Census Tract 1000, Harris County, Texas	51.5%
482011000003	Block Group 3, Census Tract 1000, Harris County, Texas	15.9%
482012101001	Block Group 1, Census Tract 2101, Harris County, Texas	0.0%
482012104001	Block Group 1, Census Tract 2104, Harris County, Texas	78.5%
482012104002	Block Group 2, Census Tract 2104, Harris County, Texas	64.1%
482012104003	Block Group 3, Census Tract 2104, Harris County, Texas	69.1%
482012104004	Block Group 4, Census Tract 2104, Harris County, Texas	71.7%
482012105001	Block Group 1, Census Tract 2105, Harris County, Texas	54.1%
482012105002	Block Group 2, Census Tract 2105, Harris County, Texas	65.1%
482012105003	Block Group 3, Census Tract 2105, Harris County, Texas	81.3%
482012106001	Block Group 1, Census Tract 2106, Harris County, Texas	64.9%
482012106002	Block Group 2, Census Tract 2106, Harris County, Texas	43.4%
482012106003	Block Group 3, Census Tract 2106, Harris County, Texas	44.5%
482012106004	Block Group 4, Census Tract 2106, Harris County, Texas	77.2%
482012107001	Block Group 1, Census Tract 2107, Harris County, Texas	65.9%
482012107002	Block Group 2, Census Tract 2107, Harris County, Texas	74.7%
482012107003	Block Group 3, Census Tract 2107, Harris County, Texas	47.6%
482012108001	Block Group 1, Census Tract 2108, Harris County, Texas	69.3%
482012108002	Block Group 2, Census Tract 2108, Harris County, Texas	73.8%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482012109001	Block Group 1, Census Tract 2109, Harris County, Texas	77.8%
482012109002	Block Group 2, Census Tract 2109, Harris County, Texas	41.5%
482012110001	Block Group 1, Census Tract 2110, Harris County, Texas	73.3%
482012110002	Block Group 2, Census Tract 2110, Harris County, Texas	79.1%
482012111001	Block Group 1, Census Tract 2111, Harris County, Texas	97.7%
482012111002	Block Group 2, Census Tract 2111, Harris County, Texas	92.4%
482012111003	Block Group 3, Census Tract 2111, Harris County, Texas	93.8%
482012111004	Block Group 4, Census Tract 2111, Harris County, Texas	87.9%
482012111005	Block Group 5, Census Tract 2111, Harris County, Texas	85.9%
482012111006	Block Group 6, Census Tract 2111, Harris County, Texas	92.5%
482012112001	Block Group 1, Census Tract 2112, Harris County, Texas	88.0%
482012112002	Block Group 2, Census Tract 2112, Harris County, Texas	50.0%
482012112003	Block Group 3, Census Tract 2112, Harris County, Texas	78.5%
482012113001	Block Group 1, Census Tract 2113, Harris County, Texas	85.5%
482012113002	Block Group 2, Census Tract 2113, Harris County, Texas	94.8%
482012113003	Block Group 3, Census Tract 2113, Harris County, Texas	89.7%
482012113004	Block Group 4, Census Tract 2113, Harris County, Texas	65.2%
482012113005	Block Group 5, Census Tract 2113, Harris County, Texas	86.3%
482012114001	Block Group 1, Census Tract 2114, Harris County, Texas	58.6%
482012114002	Block Group 2, Census Tract 2114, Harris County, Texas	69.9%
482012114003	Block Group 3, Census Tract 2114, Harris County, Texas	38.3%
482012115001	Block Group 1, Census Tract 2115, Harris County, Texas	97.1%
482012115002	Block Group 2, Census Tract 2115, Harris County, Texas	69.7%
482012115003	Block Group 3, Census Tract 2115, Harris County, Texas	56.0%
482012115004	Block Group 4, Census Tract 2115, Harris County, Texas	80.0%
482012115005	Block Group 5, Census Tract 2115, Harris County, Texas	59.1%
482012116001	Block Group 1, Census Tract 2116, Harris County, Texas	69.6%
482012116002	Block Group 2, Census Tract 2116, Harris County, Texas	71.1%
482012117001	Block Group 1, Census Tract 2117, Harris County, Texas	75.5%
482012117002	Block Group 2, Census Tract 2117, Harris County, Texas	68.2%
482012117003	Block Group 3, Census Tract 2117, Harris County, Texas	66.7%
482012119001	Block Group 1, Census Tract 2119, Harris County, Texas	69.4%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482012330021	Block Group 1, Census Tract 2330.02, Harris County, Texas	15.8%
482012330022	Block Group 2, Census Tract 2330.02, Harris County, Texas	30.5%
482012330031	Block Group 1, Census Tract 2330.03, Harris County, Texas	54.0%
482012330032	Block Group 2, Census Tract 2330.03, Harris County, Texas	30.3%
482012331011	Block Group 1, Census Tract 2331.01, Harris County, Texas	83.4%
482012331012	Block Group 2, Census Tract 2331.01, Harris County, Texas	31.9%
482012331013	Block Group 3, Census Tract 2331.01, Harris County, Texas	52.8%
482012331021	Block Group 1, Census Tract 2331.02, Harris County, Texas	65.0%
482012331022	Block Group 2, Census Tract 2331.02, Harris County, Texas	77.8%
482012331023	Block Group 3, Census Tract 2331.02, Harris County, Texas	70.9%
482012331031	Block Group 1, Census Tract 2331.03, Harris County, Texas	72.1%
482012331032	Block Group 2, Census Tract 2331.03, Harris County, Texas	64.8%
482012332001	Block Group 1, Census Tract 2332, Harris County, Texas	43.8%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482012337031	Block Group 1, Census Tract 2337.03, Harris County, Texas	69.3%
482012337032	Block Group 2, Census Tract 2337.03, Harris County, Texas	65.9%
482012401001	Block Group 1, Census Tract 2401, Harris County, Texas	71.1%
482012401002	Block Group 2, Census Tract 2401, Harris County, Texas	86.4%
482012404001	Block Group 1, Census Tract 2404, Harris County, Texas	33.8%
482012404002	Block Group 2, Census Tract 2404, Harris County, Texas	74.2%
482012405011	Block Group 1, Census Tract 2405.01, Harris County, Texas	72.4%
482012405012	Block Group 2, Census Tract 2405.01, Harris County, Texas	81.1%
482012405021	Block Group 1, Census Tract 2405.02, Harris County, Texas	89.8%
482012405022	Block Group 2, Census Tract 2405.02, Harris County, Texas	82.5%
482012405023	Block Group 3, Census Tract 2405.02, Harris County, Texas	95.5%
482012406001	Block Group 1, Census Tract 2406, Harris County, Texas	75.9%
482012407011	Block Group 1, Census Tract 2407.01, Harris County, Texas	35.6%
482012407012	Block Group 2, Census Tract 2407.01, Harris County, Texas	43.4%
482012407021	Block Group 1, Census Tract 2407.02, Harris County, Texas	62.7%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482012411011	Block Group 1, Census Tract 2411.01, Harris County, Texas	46.7%
482012411012	Block Group 2, Census Tract 2411.01, Harris County, Texas	24.0%
482012411021	Block Group 1, Census Tract 2411.02, Harris County, Texas	30.6%
482012411022	Block Group 2, Census Tract 2411.02, Harris County, Texas	27.5%
482012411023	Block Group 3, Census Tract 2411.02, Harris County, Texas	33.8%
482012411024	Block Group 4, Census Tract 2411.02, Harris County, Texas	22.8%
482012411025	Block Group 5, Census Tract 2411.02, Harris County, Texas	33.8%
482012411031	Block Group 1, Census Tract 2411.03, Harris County, Texas	67.8%
482012411032	Block Group 2, Census Tract 2411.03, Harris County, Texas	23.3%
482012412001	Block Group 1, Census Tract 2412, Harris County, Texas	47.9%
482012412002	Block Group 2, Census Tract 2412, Harris County, Texas	10.6%
482012412003	Block Group 3, Census Tract 2412, Harris County, Texas	40.4%
482012413001	Block Group 1, Census Tract 2413, Harris County, Texas	10.1%
482012413002	Block Group 2, Census Tract 2413, Harris County, Texas	15.5%
482012413003	Block Group 3, Census Tract 2413, Harris County, Texas	29.7%
482012414001	Block Group 1, Census Tract 2414, Harris County, Texas	15.2%
482012414002	Block Group 2, Census Tract 2414, Harris County, Texas	14.3%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482012504011	Block Group 1, Census Tract 2504.01, Harris County, Texas	13.9%
482012504012	Block Group 2, Census Tract 2504.01, Harris County, Texas	13.4%
482012504021	Block Group 1, Census Tract 2504.02, Harris County, Texas	8.2%
482012504022	Block Group 2, Census Tract 2504.02, Harris County, Texas	37.2%
482012504023	Block Group 3, Census Tract 2504.02, Harris County, Texas	17.2%
482012505001	Block Group 1, Census Tract 2505, Harris County, Texas	30.2%
482012505002	Block Group 2, Census Tract 2505, Harris County, Texas	31.7%
482012506001	Block Group 1, Census Tract 2506, Harris County, Texas	68.5%
482012506002	Block Group 2, Census Tract 2506, Harris County, Texas	78.6%
482012506003	Block Group 3, Census Tract 2506, Harris County, Texas	73.8%
482012506004	Block Group 4, Census Tract 2506, Harris County, Texas	77.9%
482012506005	Block Group 5, Census Tract 2506, Harris County, Texas	52.5%
482012507011	Block Group 1, Census Tract 2507.01, Harris County, Texas	21.0%
482012507012	Block Group 2, Census Tract 2507.01, Harris County, Texas	10.3%
482012507013	Block Group 3, Census Tract 2507.01, Harris County, Texas	33.2%
482012507021	Block Group 1, Census Tract 2507.02, Harris County, Texas	13.6%
482012507022	Block Group 2, Census Tract 2507.02, Harris County, Texas	8.7%
482012508001	Block Group 1, Census Tract 2508, Harris County, Texas	4.6%
482012508002	Block Group 2, Census Tract 2508, Harris County, Texas	32.2%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482012512002	Block Group 2, Census Tract 2512, Harris County, Texas	9.7%
482012512003	Block Group 3, Census Tract 2512, Harris County, Texas	17.1%
482012513001	Block Group 1, Census Tract 2513, Harris County, Texas	21.9%
482012513002	Block Group 2, Census Tract 2513, Harris County, Texas	7.7%
482012513003	Block Group 3, Census Tract 2513, Harris County, Texas	0.0%
482012513004	Block Group 4, Census Tract 2513, Harris County, Texas	6.3%
482012513005	Block Group 5, Census Tract 2513, Harris County, Texas	19.6%
482012514011	Block Group 1, Census Tract 2514.01, Harris County, Texas	1.2%
482012514021	Block Group 1, Census Tract 2514.02, Harris County, Texas	35.5%
482012514022	Block Group 2, Census Tract 2514.02, Harris County, Texas	18.9%
482012514023	Block Group 3, Census Tract 2514.02, Harris County, Texas	24.9%
482012515011	Block Group 1, Census Tract 2515.01, Harris County, Texas	9.0%
482012515021	Block Group 1, Census Tract 2515.02, Harris County, Texas	2.9%
482012515022	Block Group 2, Census Tract 2515.02, Harris County, Texas	4.0%
482012515023	Block Group 3, Census Tract 2515.02, Harris County, Texas	17.1%
482012515024	Block Group 4, Census Tract 2515.02, Harris County, Texas	3.3%
482012515025	Block Group 5, Census Tract 2515.02, Harris County, Texas	9.9%
482012515026	Block Group 6, Census Tract 2515.02, Harris County, Texas	37.6%
482012515031	Block Group 1, Census Tract 2515.03, Harris County, Texas	6.1%
482012516001	Block Group 1, Census Tract 2516, Harris County, Texas	38.8%
482012516002	Block Group 2, Census Tract 2516, Harris County, Texas	10.7%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
482012529002	Block Group 2, Census Tract 2529, Harris County, Texas	38.8%
482012529003	Block Group 3, Census Tract 2529, Harris County, Texas	28.2%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482012539002	Block Group 2, Census Tract 2539, Harris County, Texas	51.6%
482012539003	Block Group 3, Census Tract 2539, Harris County, Texas	23.7%
482012540001	Block Group 1, Census Tract 2540, Harris County, Texas	70.4%
482012540002	Block Group 2, Census Tract 2540, Harris County, Texas	37.9%
482012541001	Block Group 1, Census Tract 2541, Harris County, Texas	80.0%
482012541002	Block Group 2, Census Tract 2541, Harris County, Texas	48.7%
482012541003	Block Group 3, Census Tract 2541, Harris County, Texas	83.4%
482012541004	Block Group 4, Census Tract 2541, Harris County, Texas	80.3%
482012542001	Block Group 1, Census Tract 2542, Harris County, Texas	50.9%
482012542002	Block Group 2, Census Tract 2542, Harris County, Texas	49.0%
482012542003	Block Group 3, Census Tract 2542, Harris County, Texas	80.3%
482012543001	Block Group 1, Census Tract 2543, Harris County, Texas	42.8%
482012543002	Block Group 2, Census Tract 2543, Harris County, Texas	63.3%
482012543003	Block Group 3, Census Tract 2543, Harris County, Texas	65.4%
482012543004	Block Group 4, Census Tract 2543, Harris County, Texas	60.2%
482012544001	Block Group 1, Census Tract 2544, Harris County, Texas	60.6%
482012544002	Block Group 2, Census Tract 2544, Harris County, Texas	59.6%
482012544003	Block Group 3, Census Tract 2544, Harris County, Texas	69.4%
482012544004	Block Group 4, Census Tract 2544, Harris County, Texas	33.3%
482012545001	Block Group 1, Census Tract 2545, Harris County, Texas	63.4%
482012545002	Block Group 2, Census Tract 2545, Harris County, Texas	58.3%
482012546001	Block Group 1, Census Tract 2546, Harris County, Texas	55.2%
482012546002	Block Group 2, Census Tract 2546, Harris County, Texas	51.8%
482012546003	Block Group 3, Census Tract 2546, Harris County, Texas	59.6%
482012547001	Block Group 1, Census Tract 2547, Harris County, Texas	27.5%
482013101001	Block Group 1, Census Tract 3101, Harris County, Texas	75.9%
482013101002	Block Group 2, Census Tract 3101, Harris County, Texas	47.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013103005	Block Group 5, Census Tract 3103, Harris County, Texas	59.2%
482013103006	Block Group 6, Census Tract 3103, Harris County, Texas	67.6%
482013104001	Block Group 1, Census Tract 3104, Harris County, Texas	65.6%
482013104002	Block Group 2, Census Tract 3104, Harris County, Texas	91.8%
482013104003	Block Group 3, Census Tract 3104, Harris County, Texas	63.9%
482013105001	Block Group 1, Census Tract 3105, Harris County, Texas	47.8%
482013105002	Block Group 2, Census Tract 3105, Harris County, Texas	78.9%
482013105003	Block Group 3, Census Tract 3105, Harris County, Texas	76.5%
482013106001	Block Group 1, Census Tract 3106, Harris County, Texas	58.0%
482013106002	Block Group 2, Census Tract 3106, Harris County, Texas	62.7%
482013106003	Block Group 3, Census Tract 3106, Harris County, Texas	78.8%
482013106004	Block Group 4, Census Tract 3106, Harris County, Texas	49.5%
482013106005	Block Group 5, Census Tract 3106, Harris County, Texas	77.5%
482013107001	Block Group 1, Census Tract 3107, Harris County, Texas	65.4%
482013107002	Block Group 2, Census Tract 3107, Harris County, Texas	69.1%
482013108001	Block Group 1, Census Tract 3108, Harris County, Texas	84.7%
482013108002	Block Group 2, Census Tract 3108, Harris County, Texas	64.5%
482013109001	Block Group 1, Census Tract 3109, Harris County, Texas	56.2%
482013109002	Block Group 2, Census Tract 3109, Harris County, Texas	54.3%
482013109003	Block Group 3, Census Tract 3109, Harris County, Texas	71.6%
482013109004	Block Group 4, Census Tract 3109, Harris County, Texas	77.4%
482013109005	Block Group 5, Census Tract 3109, Harris County, Texas	68.1%
482013110001	Block Group 1, Census Tract 3110, Harris County, Texas	63.4%
482013110002	Block Group 2, Census Tract 3110, Harris County, Texas	76.3%
482013110003	Block Group 3, Census Tract 3110, Harris County, Texas	83.5%
482013110004	Block Group 4, Census Tract 3110, Harris County, Texas	78.2%
482013110005	Block Group 5, Census Tract 3110, Harris County, Texas	55.3%
482013111001	Block Group 1, Census Tract 3111, Harris County, Texas	78.7%
482013111002	Block Group 2, Census Tract 3111, Harris County, Texas	49.8%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013112002	Block Group 2, Census Tract 3112, Harris County, Texas	84.3%
482013112003	Block Group 3, Census Tract 3112, Harris County, Texas	52.1%
482013113001	Block Group 1, Census Tract 3113, Harris County, Texas	65.2%
482013113002	Block Group 2, Census Tract 3113, Harris County, Texas	48.1%
482013113003	Block Group 3, Census Tract 3113, Harris County, Texas	69.0%
482013114001	Block Group 1, Census Tract 3114, Harris County, Texas	73.7%
482013115001	Block Group 1, Census Tract 3115, Harris County, Texas	68.9%
482013115002	Block Group 2, Census Tract 3115, Harris County, Texas	82.5%
482013115003	Block Group 3, Census Tract 3115, Harris County, Texas	59.0%
482013115004	Block Group 4, Census Tract 3115, Harris County, Texas	38.1%
482013116001	Block Group 1, Census Tract 3116, Harris County, Texas	91.6%
482013116002	Block Group 2, Census Tract 3116, Harris County, Texas	84.4%
482013116003	Block Group 3, Census Tract 3116, Harris County, Texas	65.0%
482013117001	Block Group 1, Census Tract 3117, Harris County, Texas	85.9%
482013117002	Block Group 2, Census Tract 3117, Harris County, Texas	64.4%
482013118001	Block Group 1, Census Tract 3118, Harris County, Texas	78.6%
482013118002	Block Group 2, Census Tract 3118, Harris County, Texas	38.6%
482013118003	Block Group 3, Census Tract 3118, Harris County, Texas	75.3%
482013119001	Block Group 1, Census Tract 3119, Harris County, Texas	30.0%
482013119002	Block Group 2, Census Tract 3119, Harris County, Texas	69.4%
482013120001	Block Group 1, Census Tract 3120, Harris County, Texas	43.3%
482013120002	Block Group 2, Census Tract 3120, Harris County, Texas	62.7%
482013121001	Block Group 1, Census Tract 3121, Harris County, Texas	0.0%
482013122001	Block Group 1, Census Tract 3122, Harris County, Texas	95.6%
482013122002	Block Group 2, Census Tract 3122, Harris County, Texas	95.9%
482013122003	Block Group 3, Census Tract 3122, Harris County, Texas	91.1%
482013123001	Block Group 1, Census Tract 3123, Harris County, Texas	72.9%
482013123002	Block Group 2, Census Tract 3123, Harris County, Texas	98.5%
482013124001	Block Group 1, Census Tract 3124, Harris County, Texas	100.0%
482013124002	Block Group 2, Census Tract 3124, Harris County, Texas	83.5%
482013124003	Block Group 3, Census Tract 3124, Harris County, Texas	81.4%
482013125001	Block Group 1, Census Tract 3125, Harris County, Texas	19.9%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013125002	Block Group 2, Census Tract 3125, Harris County, Texas	34.8%
482013126001	Block Group 1, Census Tract 3126, Harris County, Texas	41.2%
482013126002	Block Group 2, Census Tract 3126, Harris County, Texas	27.6%
482013126003	Block Group 3, Census Tract 3126, Harris County, Texas	77.3%
482013126004	Block Group 4, Census Tract 3126, Harris County, Texas	22.3%
482013127001	Block Group 1, Census Tract 3127, Harris County, Texas	16.9%
482013127002	Block Group 2, Census Tract 3127, Harris County, Texas	56.3%
482013127003	Block Group 3, Census Tract 3127, Harris County, Texas	74.7%
482013128001	Block Group 1, Census Tract 3128, Harris County, Texas	96.0%
482013128002	Block Group 2, Census Tract 3128, Harris County, Texas	82.4%
482013129001	Block Group 1, Census Tract 3129, Harris County, Texas	76.3%
482013129002	Block Group 2, Census Tract 3129, Harris County, Texas	45.7%
482013130001	Block Group 1, Census Tract 3130, Harris County, Texas	43.1%
482013130002	Block Group 2, Census Tract 3130, Harris County, Texas	55.1%
482013130003	Block Group 3, Census Tract 3130, Harris County, Texas	49.7%
482013131001	Block Group 1, Census Tract 3131, Harris County, Texas	22.4%
482013131002	Block Group 2, Census Tract 3131, Harris County, Texas	18.8%
482013132001	Block Group 1, Census Tract 3132, Harris County, Texas	22.8%
482013132002	Block Group 2, Census Tract 3132, Harris County, Texas	65.7%
482013132003	Block Group 3, Census Tract 3132, Harris County, Texas	71.0%
482013132004	Block Group 4, Census Tract 3132, Harris County, Texas	45.6%
482013133001	Block Group 1, Census Tract 3133, Harris County, Texas	69.1%
482013133002	Block Group 2, Census Tract 3133, Harris County, Texas	47.8%
482013134001	Block Group 1, Census Tract 3134, Harris County, Texas	62.0%
482013134002	Block Group 2, Census Tract 3134, Harris County, Texas	79.7%
482013135001	Block Group 1, Census Tract 3135, Harris County, Texas	64.5%
482013135002	Block Group 2, Census Tract 3135, Harris County, Texas	73.5%
482013135003	Block Group 3, Census Tract 3135, Harris County, Texas	15.6%
482013136001	Block Group 1, Census Tract 3136, Harris County, Texas	63.8%
482013136002	Block Group 2, Census Tract 3136, Harris County, Texas	86.7%
482013136003	Block Group 3, Census Tract 3136, Harris County, Texas	64.8%
482013137001	Block Group 1, Census Tract 3137, Harris County, Texas	51.1%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013307001	Block Group 1, Census Tract 3307, Harris County, Texas	73.0%
482013307002	Block Group 2, Census Tract 3307, Harris County, Texas	52.5%
482013307003	Block Group 3, Census Tract 3307, Harris County, Texas	79.3%
482013308001	Block Group 1, Census Tract 3308, Harris County, Texas	66.0%
482013308002	Block Group 2, Census Tract 3308, Harris County, Texas	32.4%
482013309001	Block Group 1, Census Tract 3309, Harris County, Texas	32.5%
482013309002	Block Group 2, Census Tract 3309, Harris County, Texas	61.2%
482013309003	Block Group 3, Census Tract 3309, Harris County, Texas	49.8%
482013311001	Block Group 1, Census Tract 3311, Harris County, Texas	68.9%
482013311002	Block Group 2, Census Tract 3311, Harris County, Texas	35.1%
482013311003	Block Group 3, Census Tract 3311, Harris County, Texas	86.7%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013317002	Block Group 2, Census Tract 3317, Harris County, Texas	65.4%
482013317003	Block Group 3, Census Tract 3317, Harris County, Texas	78.1%
482013318001	Block Group 1, Census Tract 3318, Harris County, Texas	72.7%
482013318002	Block Group 2, Census Tract 3318, Harris County, Texas	58.5%
482013319001	Block Group 1, Census Tract 3319, Harris County, Texas	75.5%
482013319002	Block Group 2, Census Tract 3319, Harris County, Texas	51.9%
482013319003	Block Group 3, Census Tract 3319, Harris County, Texas	75.4%
482013320001	Block Group 1, Census Tract 3320, Harris County, Texas	54.7%
482013320002	Block Group 2, Census Tract 3320, Harris County, Texas	81.3%
482013320003	Block Group 3, Census Tract 3320, Harris County, Texas	91.4%
482013320004	Block Group 4, Census Tract 3320, Harris County, Texas	42.7%
482013321001	Block Group 1, Census Tract 3321, Harris County, Texas	83.1%
482013321002	Block Group 2, Census Tract 3321, Harris County, Texas	59.7%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013329001	Block Group 1, Census Tract 3329, Harris County, Texas	79.4%
482013329002	Block Group 2, Census Tract 3329, Harris County, Texas	56.2%
482013330001	Block Group 1, Census Tract 3330, Harris County, Texas	44.4%
482013330002	Block Group 2, Census Tract 3330, Harris County, Texas	41.8%
482013331001	Block Group 1, Census Tract 3331, Harris County, Texas	76.8%
482013331002	Block Group 2, Census Tract 3331, Harris County, Texas	79.1%
482013332011	Block Group 1, Census Tract 3332.01, Harris County, Texas	61.6%
482013332012	Block Group 2, Census Tract 3332.01, Harris County, Texas	80.7%
482013332013	Block Group 3, Census Tract 3332.01, Harris County, Texas	60.4%
482013332021	Block Group 1, Census Tract 3332.02, Harris County, Texas	47.1%
482013332022	Block Group 2, Census Tract 3332.02, Harris County, Texas	69.2%
482013332023	Block Group 3, Census Tract 3332.02, Harris County, Texas	78.9%
482013332024	Block Group 4, Census Tract 3332.02, Harris County, Texas	71.9%
482013333001	Block Group 1, Census Tract 3333, Harris County, Texas	57.1%
482013333002	Block Group 2, Census Tract 3333, Harris County, Texas	77.4%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013339022	Block Group 2, Census Tract 3339.02, Harris County, Texas	34.3%
482013339023	Block Group 3, Census Tract 3339.02, Harris County, Texas	49.6%
482013340011	Block Group 1, Census Tract 3340.01, Harris County, Texas	77.2%
482013340012	Block Group 2, Census Tract 3340.01, Harris County, Texas	53.6%
482013340021	Block Group 1, Census Tract 3340.02, Harris County, Texas	15.0%
482013340022	Block Group 2, Census Tract 3340.02, Harris County, Texas	45.4%
482013340031	Block Group 1, Census Tract 3340.03, Harris County, Texas	31.5%
482013340032	Block Group 2, Census Tract 3340.03, Harris County, Texas	46.8%
482013340033	Block Group 3, Census Tract 3340.03, Harris County, Texas	43.8%
482013341001	Block Group 1, Census Tract 3341, Harris County, Texas	44.0%
482013341002	Block Group 2, Census Tract 3341, Harris County, Texas	51.8%
482013341003	Block Group 3, Census Tract 3341, Harris County, Texas	44.5%
482013341004	Block Group 4, Census Tract 3341, Harris County, Texas	30.7%
482013401001	Block Group 1, Census Tract 3401, Harris County, Texas	36.5%
482013401002	Block Group 2, Census Tract 3401, Harris County, Texas	69.8%
482013402011	Block Group 1, Census Tract 3402.01, Harris County, Texas	6.3%
482013402012	Block Group 2, Census Tract 3402.01, Harris County, Texas	31.7%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482013503003	Block Group 3, Census Tract 3503, Harris County, Texas	22.8%
482013503004	Block Group 4, Census Tract 3503, Harris County, Texas	16.3%
482013504001	Block Group 1, Census Tract 3504, Harris County, Texas	29.1%
482013504002	Block Group 2, Census Tract 3504, Harris County, Texas	21.2%
482013504003	Block Group 3, Census Tract 3504, Harris County, Texas	62.8%
482013505001	Block Group 1, Census Tract 3505, Harris County, Texas	50.6%
482013505002	Block Group 2, Census Tract 3505, Harris County, Texas	77.5%
482013505003	Block Group 3, Census Tract 3505, Harris County, Texas	51.2%
482013505004	Block Group 4, Census Tract 3505, Harris County, Texas	36.1%
482013506011	Block Group 1, Census Tract 3506.01, Harris County, Texas	9.5%
482013506012	Block Group 2, Census Tract 3506.01, Harris County, Texas	5.4%
482013506021	Block Group 1, Census Tract 3506.02, Harris County, Texas	19.9%
482013506022	Block Group 2, Census Tract 3506.02, Harris County, Texas	26.2%
482013506023	Block Group 3, Census Tract 3506.02, Harris County, Texas	18.5%
482013507001	Block Group 1, Census Tract 3507, Harris County, Texas	15.6%
482013507002	Block Group 2, Census Tract 3507, Harris County, Texas	22.8%
482013508011	Block Group 1, Census Tract 3508.01, Harris County, Texas	45.4%
482013508012	Block Group 2, Census Tract 3508.01, Harris County, Texas	37.4%
482013508013	Block Group 3, Census Tract 3508.01, Harris County, Texas	15.9%
482013508021	Block Group 1, Census Tract 3508.02, Harris County, Texas	7.7%
482013508022	Block Group 2, Census Tract 3508.02, Harris County, Texas	46.3%
482014101001	Block Group 1, Census Tract 4101, Harris County, Texas	53.5%
482014101002	Block Group 2, Census Tract 4101, Harris County, Texas	39.3%
482014102001	Block Group 1, Census Tract 4102, Harris County, Texas	35.4%
482014102002	Block Group 2, Census Tract 4102, Harris County, Texas	26.3%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014104021	Block Group 1, Census Tract 4104.02, Harris County, Texas	52.0%
482014104022	Block Group 2, Census Tract 4104.02, Harris County, Texas	36.2%
482014105001	Block Group 1, Census Tract 4105, Harris County, Texas	37.5%
482014105002	Block Group 2, Census Tract 4105, Harris County, Texas	32.8%
482014105003	Block Group 3, Census Tract 4105, Harris County, Texas	37.3%
482014105004	Block Group 4, Census Tract 4105, Harris County, Texas	16.0%
482014106001	Block Group 1, Census Tract 4106, Harris County, Texas	17.5%
482014106002	Block Group 2, Census Tract 4106, Harris County, Texas	20.2%
482014107011	Block Group 1, Census Tract 4107.01, Harris County, Texas	26.0%
482014107012	Block Group 2, Census Tract 4107.01, Harris County, Texas	38.6%
482014107013	Block Group 3, Census Tract 4107.01, Harris County, Texas	48.2%
482014107014	Block Group 4, Census Tract 4107.01, Harris County, Texas	53.0%
482014107021	Block Group 1, Census Tract 4107.02, Harris County, Texas	34.9%
482014107022	Block Group 2, Census Tract 4107.02, Harris County, Texas	65.7%
482014108001	Block Group 1, Census Tract 4108, Harris County, Texas	39.4%
482014108002	Block Group 2, Census Tract 4108, Harris County, Texas	63.1%
482014108003	Block Group 3, Census Tract 4108, Harris County, Texas	59.8%
482014109001	Block Group 1, Census Tract 4109, Harris County, Texas	44.5%
482014109002	Block Group 2, Census Tract 4109, Harris County, Texas	48.6%
482014109003	Block Group 3, Census Tract 4109, Harris County, Texas	15.1%
482014110001	Block Group 1, Census Tract 4110, Harris County, Texas	26.0%
482014110002	Block Group 2, Census Tract 4110, Harris County, Texas	29.5%
482014110003	Block Group 3, Census Tract 4110, Harris County, Texas	13.2%
482014111001	Block Group 1, Census Tract 4111, Harris County, Texas	10.1%
482014111002	Block Group 2, Census Tract 4111, Harris County, Texas	15.1%
482014111003	Block Group 3, Census Tract 4111, Harris County, Texas	25.6%
482014112001	Block Group 1, Census Tract 4112, Harris County, Texas	2.9%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014114002	Block Group 2, Census Tract 4114, Harris County, Texas	8.1%
482014114003	Block Group 3, Census Tract 4114, Harris County, Texas	1.6%
482014115011	Block Group 1, Census Tract 4115.01, Harris County, Texas	31.0%
482014115012	Block Group 2, Census Tract 4115.01, Harris County, Texas	14.1%
482014115013	Block Group 3, Census Tract 4115.01, Harris County, Texas	26.4%
482014115021	Block Group 1, Census Tract 4115.02, Harris County, Texas	11.5%
482014115022	Block Group 2, Census Tract 4115.02, Harris County, Texas	9.5%
482014115023	Block Group 3, Census Tract 4115.02, Harris County, Texas	31.1%
482014115024	Block Group 4, Census Tract 4115.02, Harris County, Texas	22.9%
482014116001	Block Group 1, Census Tract 4116, Harris County, Texas	7.1%
482014116002	Block Group 2, Census Tract 4116, Harris County, Texas	20.7%
482014117001	Block Group 1, Census Tract 4117, Harris County, Texas	64.5%
482014117002	Block Group 2, Census Tract 4117, Harris County, Texas	20.4%
482014118001	Block Group 1, Census Tract 4118, Harris County, Texas	58.6%
482014118002	Block Group 2, Census Tract 4118, Harris County, Texas	15.4%
482014118003	Block Group 3, Census Tract 4118, Harris County, Texas	23.6%
482014118004	Block Group 4, Census Tract 4118, Harris County, Texas	11.1%
482014119001	Block Group 1, Census Tract 4119, Harris County, Texas	31.9%
482014119002	Block Group 2, Census Tract 4119, Harris County, Texas	17.9%
482014119003	Block Group 3, Census Tract 4119, Harris County, Texas	31.0%
482014120001	Block Group 1, Census Tract 4120, Harris County, Texas	22.5%
482014120002	Block Group 2, Census Tract 4120, Harris County, Texas	9.3%
482014120003	Block Group 3, Census Tract 4120, Harris County, Texas	6.5%
482014121001	Block Group 1, Census Tract 4121, Harris County, Texas	100.0%
482014122001	Block Group 1, Census Tract 4122, Harris County, Texas	8.0%
482014122002	Block Group 2, Census Tract 4122, Harris County, Texas	7.8%
482014122003	Block Group 3, Census Tract 4122, Harris County, Texas	23.6%
482014122004	Block Group 4, Census Tract 4122, Harris County, Texas	11.4%
482014123001	Block Group 1, Census Tract 4123, Harris County, Texas	4.9%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014123005	Block Group 5, Census Tract 4123, Harris County, Texas	13.0%
482014124001	Block Group 1, Census Tract 4124, Harris County, Texas	0.0%
482014124002	Block Group 2, Census Tract 4124, Harris County, Texas	9.4%
482014124003	Block Group 3, Census Tract 4124, Harris County, Texas	3.8%
482014124004	Block Group 4, Census Tract 4124, Harris County, Texas	8.4%
482014125001	Block Group 1, Census Tract 4125, Harris County, Texas	8.2%
482014125002	Block Group 2, Census Tract 4125, Harris County, Texas	30.4%
482014126001	Block Group 1, Census Tract 4126, Harris County, Texas	6.5%
482014126002	Block Group 2, Census Tract 4126, Harris County, Texas	23.1%
482014126003	Block Group 3, Census Tract 4126, Harris County, Texas	3.4%
482014127001	Block Group 1, Census Tract 4127, Harris County, Texas	14.8%
482014127002	Block Group 2, Census Tract 4127, Harris County, Texas	14.2%
482014128001	Block Group 1, Census Tract 4128, Harris County, Texas	5.2%
482014128002	Block Group 2, Census Tract 4128, Harris County, Texas	15.8%
482014128003	Block Group 3, Census Tract 4128, Harris County, Texas	7.6%
482014129001	Block Group 1, Census Tract 4129, Harris County, Texas	37.7%
482014129002	Block Group 2, Census Tract 4129, Harris County, Texas	48.6%
482014129003	Block Group 3, Census Tract 4129, Harris County, Texas	18.1%
482014130001	Block Group 1, Census Tract 4130, Harris County, Texas	15.1%
482014130002	Block Group 2, Census Tract 4130, Harris County, Texas	27.7%
482014131001	Block Group 1, Census Tract 4131, Harris County, Texas	15.7%
482014131002	Block Group 2, Census Tract 4131, Harris County, Texas	24.7%
482014131003	Block Group 3, Census Tract 4131, Harris County, Texas	7.8%
482014132011	Block Group 1, Census Tract 4132.01, Harris County, Texas	38.4%
482014132012	Block Group 2, Census Tract 4132.01, Harris County, Texas	15.0%
482014132021	Block Group 1, Census Tract 4132.02, Harris County, Texas	30.6%
482014132022	Block Group 2, Census Tract 4132.02, Harris County, Texas	18.7%
482014133001	Block Group 1, Census Tract 4133, Harris County, Texas	75.0%
482014133002	Block Group 2, Census Tract 4133, Harris County, Texas	20.9%
482014133003	Block Group 3, Census Tract 4133, Harris County, Texas	16.4%
482014133004	Block Group 4, Census Tract 4133, Harris County, Texas	41.6%
482014133005	Block Group 5, Census Tract 4133, Harris County, Texas	6.1%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014201001	Block Group 1, Census Tract 4201, Harris County, Texas	62.9%
482014201002	Block Group 2, Census Tract 4201, Harris County, Texas	75.5%
482014202001	Block Group 1, Census Tract 4202, Harris County, Texas	44.2%
482014202002	Block Group 2, Census Tract 4202, Harris County, Texas	39.7%
482014203001	Block Group 1, Census Tract 4203, Harris County, Texas	21.8%
482014203002	Block Group 2, Census Tract 4203, Harris County, Texas	19.9%
482014203003	Block Group 3, Census Tract 4203, Harris County, Texas	14.2%
482014204001	Block Group 1, Census Tract 4204, Harris County, Texas	22.7%
482014204002	Block Group 2, Census Tract 4204, Harris County, Texas	20.1%
482014204003	Block Group 3, Census Tract 4204, Harris County, Texas	52.9%
482014205001	Block Group 1, Census Tract 4205, Harris County, Texas	58.5%
482014205002	Block Group 2, Census Tract 4205, Harris County, Texas	82.5%
482014205003	Block Group 3, Census Tract 4205, Harris County, Texas	89.3%
482014206001	Block Group 1, Census Tract 4206, Harris County, Texas	45.2%
482014206002	Block Group 2, Census Tract 4206, Harris County, Texas	19.8%
482014207001	Block Group 1, Census Tract 4207, Harris County, Texas	4.3%
482014207002	Block Group 2, Census Tract 4207, Harris County, Texas	2.2%
482014207003	Block Group 3, Census Tract 4207, Harris County, Texas	8.7%
482014208001	Block Group 1, Census Tract 4208, Harris County, Texas	12.7%
482014208002	Block Group 2, Census Tract 4208, Harris County, Texas	11.3%
482014208003	Block Group 3, Census Tract 4208, Harris County, Texas	17.4%
482014209001	Block Group 1, Census Tract 4209, Harris County, Texas	15.4%
482014209002	Block Group 2, Census Tract 4209, Harris County, Texas	1.1%
482014209003	Block Group 3, Census Tract 4209, Harris County, Texas	9.1%
482014209004	Block Group 4, Census Tract 4209, Harris County, Texas	9.0%
482014210001	Block Group 1, Census Tract 4210, Harris County, Texas	5.6%
482014210002	Block Group 2, Census Tract 4210, Harris County, Texas	10.3%
482014211011	Block Group 1, Census Tract 4211.01, Harris County, Texas	27.3%
482014211012	Block Group 2, Census Tract 4211.01, Harris County, Texas	81.8%
482014211021	Block Group 1, Census Tract 4211.02, Harris County, Texas	87.1%
482014211022	Block Group 2, Census Tract 4211.02, Harris County, Texas	46.3%
482014211023	Block Group 3, Census Tract 4211.02, Harris County, Texas	77.2%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014310002	Block Group 2, Census Tract 4310, Harris County, Texas	3.6%
482014310003	Block Group 3, Census Tract 4310, Harris County, Texas	22.6%
482014310004	Block Group 4, Census Tract 4310, Harris County, Texas	3.7%
482014311011	Block Group 1, Census Tract 4311.01, Harris County, Texas	8.0%
482014311012	Block Group 2, Census Tract 4311.01, Harris County, Texas	55.3%
482014311013	Block Group 3, Census Tract 4311.01, Harris County, Texas	12.4%
482014311021	Block Group 1, Census Tract 4311.02, Harris County, Texas	33.2%
482014311022	Block Group 2, Census Tract 4311.02, Harris County, Texas	20.6%
482014312011	Block Group 1, Census Tract 4312.01, Harris County, Texas	17.8%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014316003	Block Group 3, Census Tract 4316, Harris County, Texas	12.4%
482014317001	Block Group 1, Census Tract 4317, Harris County, Texas	10.4%
482014317002	Block Group 2, Census Tract 4317, Harris County, Texas	13.0%
482014317003	Block Group 3, Census Tract 4317, Harris County, Texas	6.7%
482014318011	Block Group 1, Census Tract 4318.01, Harris County, Texas	17.6%
482014318012	Block Group 2, Census Tract 4318.01, Harris County, Texas	21.5%
482014318013	Block Group 3, Census Tract 4318.01, Harris County, Texas	12.2%
482014318021	Block Group 1, Census Tract 4318.02, Harris County, Texas	21.1%
482014318022	Block Group 2, Census Tract 4318.02, Harris County, Texas	21.8%
482014319001	Block Group 1, Census Tract 4319, Harris County, Texas	19.1%
482014319002	Block Group 2, Census Tract 4319, Harris County, Texas	12.3%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014326001	Block Group 1, Census Tract 4326, Harris County, Texas	4.4%
482014326002	Block Group 2, Census Tract 4326, Harris County, Texas	34.4%
482014327011	Block Group 1, Census Tract 4327.01, Harris County, Texas	93.2%
482014327012	Block Group 2, Census Tract 4327.01, Harris County, Texas	82.6%
482014327013	Block Group 3, Census Tract 4327.01, Harris County, Texas	53.4%
482014327021	Block Group 1, Census Tract 4327.02, Harris County, Texas	50.8%
482014327022	Block Group 2, Census Tract 4327.02, Harris County, Texas	65.6%
482014328011	Block Group 1, Census Tract 4328.01, Harris County, Texas	66.7%
482014328012	Block Group 2, Census Tract 4328.01, Harris County, Texas	89.5%
482014328013	Block Group 3, Census Tract 4328.01, Harris County, Texas	79.1%
482014328021	Block Group 1, Census Tract 4328.02, Harris County, Texas	83.7%
482014328022	Block Group 2, Census Tract 4328.02, Harris County, Texas	76.3%
482014328023	Block Group 3, Census Tract 4328.02, Harris County, Texas	81.9%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
482014504002	Block Group 2, Census Tract 4504, Harris County, Texas	42.1%
482014504003	Block Group 3, Census Tract 4504, Harris County, Texas	25.6%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014532002	Block Group 2, Census Tract 4532, Harris County, Texas	91.2%
482014532003	Block Group 3, Census Tract 4532, Harris County, Texas	88.0%
482014533001	Block Group 1, Census Tract 4533, Harris County, Texas	88.0%
482014534011	Block Group 1, Census Tract 4534.01, Harris County, Texas	74.3%
482014534012	Block Group 2, Census Tract 4534.01, Harris County, Texas	32.0%
482014534021	Block Group 1, Census Tract 4534.02, Harris County, Texas	52.5%
482014534022	Block Group 2, Census Tract 4534.02, Harris County, Texas	76.4%
482014534023	Block Group 3, Census Tract 4534.02, Harris County, Texas	63.8%
482014534024	Block Group 4, Census Tract 4534.02, Harris County, Texas	65.9%
482014534031	Block Group 1, Census Tract 4534.03, Harris County, Texas	60.9%
482014534032	Block Group 2, Census Tract 4534.03, Harris County, Texas	94.0%
482014535011	Block Group 1, Census Tract 4535.01, Harris County, Texas	66.2%
482014535012	Block Group 2, Census Tract 4535.01, Harris County, Texas	50.8%
482014535013	Block Group 3, Census Tract 4535.01, Harris County, Texas	53.8%
482014535021	Block Group 1, Census Tract 4535.02, Harris County, Texas	34.0%
482014535022	Block Group 2, Census Tract 4535.02, Harris County, Texas	59.4%
482014536011	Block Group 1, Census Tract 4536.01, Harris County, Texas	40.7%
482014536021	Block Group 1, Census Tract 4536.02, Harris County, Texas	71.2%
482014536022	Block Group 2, Census Tract 4536.02, Harris County, Texas	77.1%
482014536023	Block Group 3, Census Tract 4536.02, Harris County, Texas	59.7%
482014536024	Block Group 4, Census Tract 4536.02, Harris County, Texas	54.2%
482014537001	Block Group 1, Census Tract 4537, Harris County, Texas	61.6%
482014537002	Block Group 2, Census Tract 4537, Harris County, Texas	48.3%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014541001	Block Group 1, Census Tract 4541, Harris County, Texas	40.3%
482014541002	Block Group 2, Census Tract 4541, Harris County, Texas	53.9%
482014542001	Block Group 1, Census Tract 4542, Harris County, Texas	44.1%
482014542002	Block Group 2, Census Tract 4542, Harris County, Texas	29.2%
482014543011	Block Group 1, Census Tract 4543.01, Harris County, Texas	41.4%
482014543012	Block Group 2, Census Tract 4543.01, Harris County, Texas	58.9%
482014543013	Block Group 3, Census Tract 4543.01, Harris County, Texas	65.1%
482014543014	Block Group 4, Census Tract 4543.01, Harris County, Texas	39.1%
482014543021	Block Group 1, Census Tract 4543.02, Harris County, Texas	43.6%
482014543022	Block Group 2, Census Tract 4543.02, Harris County, Texas	53.7%
482014544001	Block Group 1, Census Tract 4544, Harris County, Texas	35.7%
482014545011	Block Group 1, Census Tract 4545.01, Harris County, Texas	0.0%
482014545012	Block Group 2, Census Tract 4545.01, Harris County, Texas	10.9%
482014545013	Block Group 3, Census Tract 4545.01, Harris County, Texas	9.0%
482014545021	Block Group 1, Census Tract 4545.02, Harris County, Texas	8.8%
482014546001	Block Group 1, Census Tract 4546, Harris County, Texas	28.2%
482014547001	Block Group 1, Census Tract 4547, Harris County, Texas	11.3%
482014547002	Block Group 2, Census Tract 4547, Harris County, Texas	34.9%
482014547003	Block Group 3, Census Tract 4547, Harris County, Texas	3.5%
482014547004	Block Group 4, Census Tract 4547, Harris County, Texas	15.8%
482014548001	Block Group 1, Census Tract 4548, Harris County, Texas	9.6%
482014548002	Block Group 2, Census Tract 4548, Harris County, Texas	35.2%
482014548003	Block Group 3, Census Tract 4548, Harris County, Texas	34.7%
482014549001	Block Group 1, Census Tract 4549, Harris County, Texas	3.0%
482014549002	Block Group 2, Census Tract 4549, Harris County, Texas	19.3%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482014552001	Block Group 1, Census Tract 4552, Harris County, Texas	15.8%
482014552002	Block Group 2, Census Tract 4552, Harris County, Texas	14.0%
482014552003	Block Group 3, Census Tract 4552, Harris County, Texas	0.9%
482014553001	Block Group 1, Census Tract 4553, Harris County, Texas	39.5%
482015101001	Block Group 1, Census Tract 5101, Harris County, Texas	50.9%
482015101002	Block Group 2, Census Tract 5101, Harris County, Texas	83.3%
482015102001	Block Group 1, Census Tract 5102, Harris County, Texas	65.1%
482015102002	Block Group 2, Census Tract 5102, Harris County, Texas	28.7%
482015103001	Block Group 1, Census Tract 5103, Harris County, Texas	22.0%
482015103002	Block Group 2, Census Tract 5103, Harris County, Texas	17.8%
482015103003	Block Group 3, Census Tract 5103, Harris County, Texas	13.4%
482015103004	Block Group 4, Census Tract 5103, Harris County, Texas	11.9%
482015103005	Block Group 5, Census Tract 5103, Harris County, Texas	40.5%
482015104001	Block Group 1, Census Tract 5104, Harris County, Texas	44.0%
482015104002	Block Group 2, Census Tract 5104, Harris County, Texas	32.3%
482015104003	Block Group 3, Census Tract 5104, Harris County, Texas	24.6%
482015105001	Block Group 1, Census Tract 5105, Harris County, Texas	41.0%
482015105002	Block Group 2, Census Tract 5105, Harris County, Texas	69.6%
482015105003	Block Group 3, Census Tract 5105, Harris County, Texas	20.1%
482015106001	Block Group 1, Census Tract 5106, Harris County, Texas	54.2%
482015106002	Block Group 2, Census Tract 5106, Harris County, Texas	47.6%
482015106003	Block Group 3, Census Tract 5106, Harris County, Texas	19.1%
482015107001	Block Group 1, Census Tract 5107, Harris County, Texas	13.1%
482015107002	Block Group 2, Census Tract 5107, Harris County, Texas	31.3%
482015108001	Block Group 1, Census Tract 5108, Harris County, Texas	8.7%
482015108002	Block Group 2, Census Tract 5108, Harris County, Texas	11.0%
482015108003	Block Group 3, Census Tract 5108, Harris County, Texas	18.4%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015109003	Block Group 3, Census Tract 5109, Harris County, Texas	35.8%
482015110011	Block Group 1, Census Tract 5110.01, Harris County, Texas	17.6%
482015110012	Block Group 2, Census Tract 5110.01, Harris County, Texas	39.9%
482015110021	Block Group 1, Census Tract 5110.02, Harris County, Texas	25.8%
482015110022	Block Group 2, Census Tract 5110.02, Harris County, Texas	45.4%
482015110023	Block Group 3, Census Tract 5110.02, Harris County, Texas	11.7%
482015111001	Block Group 1, Census Tract 5111, Harris County, Texas	40.4%
482015111002	Block Group 2, Census Tract 5111, Harris County, Texas	40.4%
482015112001	Block Group 1, Census Tract 5112, Harris County, Texas	47.1%
482015112002	Block Group 2, Census Tract 5112, Harris County, Texas	35.4%
482015112003	Block Group 3, Census Tract 5112, Harris County, Texas	11.5%
482015113011	Block Group 1, Census Tract 5113.01, Harris County, Texas	39.9%
482015113012	Block Group 2, Census Tract 5113.01, Harris County, Texas	6.5%
482015113013	Block Group 3, Census Tract 5113.01, Harris County, Texas	49.0%
482015113014	Block Group 4, Census Tract 5113.01, Harris County, Texas	33.1%
482015113021	Block Group 1, Census Tract 5113.02, Harris County, Texas	18.4%
482015113022	Block Group 2, Census Tract 5113.02, Harris County, Texas	41.9%
482015113023	Block Group 3, Census Tract 5113.02, Harris County, Texas	51.3%
482015114001	Block Group 1, Census Tract 5114, Harris County, Texas	32.4%
482015114002	Block Group 2, Census Tract 5114, Harris County, Texas	25.1%
482015114003	Block Group 3, Census Tract 5114, Harris County, Texas	62.9%
482015115001	Block Group 1, Census Tract 5115, Harris County, Texas	77.3%
482015115002	Block Group 2, Census Tract 5115, Harris County, Texas	61.4%
482015115003	Block Group 3, Census Tract 5115, Harris County, Texas	40.0%
482015115004	Block Group 4, Census Tract 5115, Harris County, Texas	17.1%
482015115005	Block Group 5, Census Tract 5115, Harris County, Texas	50.8%
482015115006	Block Group 6, Census Tract 5115, Harris County, Texas	21.2%
482015115007	Block Group 7, Census Tract 5115, Harris County, Texas	47.6%
482015116001	Block Group 1, Census Tract 5116, Harris County, Texas	67.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015201001	Block Group 1, Census Tract 5201, Harris County, Texas	48.5%
482015202001	Block Group 1, Census Tract 5202, Harris County, Texas	14.7%
482015202002	Block Group 2, Census Tract 5202, Harris County, Texas	11.6%
482015202003	Block Group 3, Census Tract 5202, Harris County, Texas	33.8%
482015203001	Block Group 1, Census Tract 5203, Harris County, Texas	51.8%
482015203002	Block Group 2, Census Tract 5203, Harris County, Texas	87.1%
482015203003	Block Group 3, Census Tract 5203, Harris County, Texas	45.5%
482015204001	Block Group 1, Census Tract 5204, Harris County, Texas	77.0%
482015204002	Block Group 2, Census Tract 5204, Harris County, Texas	74.6%
482015205001	Block Group 1, Census Tract 5205, Harris County, Texas	80.0%
482015205002	Block Group 2, Census Tract 5205, Harris County, Texas	81.8%
482015205003	Block Group 3, Census Tract 5205, Harris County, Texas	63.0%
482015205004	Block Group 4, Census Tract 5205, Harris County, Texas	52.9%
482015206011	Block Group 1, Census Tract 5206.01, Harris County, Texas	75.9%
482015206021	Block Group 1, Census Tract 5206.02, Harris County, Texas	76.3%
482015206022	Block Group 2, Census Tract 5206.02, Harris County, Texas	73.8%
482015206023	Block Group 3, Census Tract 5206.02, Harris County, Texas	65.4%
482015206024	Block Group 4, Census Tract 5206.02, Harris County, Texas	68.2%
482015207001	Block Group 1, Census Tract 5207, Harris County, Texas	50.4%
482015207002	Block Group 2, Census Tract 5207, Harris County, Texas	34.3%
482015207003	Block Group 3, Census Tract 5207, Harris County, Texas	29.8%
482015207004	Block Group 4, Census Tract 5207, Harris County, Texas	48.5%
482015210001	Block Group 1, Census Tract 5210, Harris County, Texas	80.3%
482015211001	Block Group 1, Census Tract 5211, Harris County, Texas	68.1%
482015212001	Block Group 1, Census Tract 5212, Harris County, Texas	84.1%
482015212002	Block Group 2, Census Tract 5212, Harris County, Texas	57.5%
482015212003	Block Group 3, Census Tract 5212, Harris County, Texas	68.0%
482015213001	Block Group 1, Census Tract 5213, Harris County, Texas	61.0%
482015213002	Block Group 2, Census Tract 5213, Harris County, Texas	62.5%
482015213003	Block Group 3, Census Tract 5213, Harris County, Texas	38.5%
482015213004	Block Group 4, Census Tract 5213, Harris County, Texas	56.3%
482015214001	Block Group 1, Census Tract 5214, Harris County, Texas	91.0%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015214002	Block Group 2, Census Tract 5214, Harris County, Texas	95.0%
482015214003	Block Group 3, Census Tract 5214, Harris County, Texas	54.1%
482015214004	Block Group 4, Census Tract 5214, Harris County, Texas	84.9%
482015215001	Block Group 1, Census Tract 5215, Harris County, Texas	84.6%
482015215002	Block Group 2, Census Tract 5215, Harris County, Texas	55.0%
482015215003	Block Group 3, Census Tract 5215, Harris County, Texas	54.2%
482015215004	Block Group 4, Census Tract 5215, Harris County, Texas	24.8%
482015216001	Block Group 1, Census Tract 5216, Harris County, Texas	51.4%
482015216002	Block Group 2, Census Tract 5216, Harris County, Texas	76.4%
482015217001	Block Group 1, Census Tract 5217, Harris County, Texas	86.5%
482015217002	Block Group 2, Census Tract 5217, Harris County, Texas	81.6%
482015217003	Block Group 3, Census Tract 5217, Harris County, Texas	61.2%
482015217004	Block Group 4, Census Tract 5217, Harris County, Texas	77.9%
482015218001	Block Group 1, Census Tract 5218, Harris County, Texas	42.9%
482015218002	Block Group 2, Census Tract 5218, Harris County, Texas	29.8%
482015219001	Block Group 1, Census Tract 5219, Harris County, Texas	18.8%
482015219002	Block Group 2, Census Tract 5219, Harris County, Texas	58.0%
482015219003	Block Group 3, Census Tract 5219, Harris County, Texas	46.0%
482015220001	Block Group 1, Census Tract 5220, Harris County, Texas	35.7%
482015220002	Block Group 2, Census Tract 5220, Harris County, Texas	44.0%
482015220003	Block Group 3, Census Tract 5220, Harris County, Texas	63.8%
482015221001	Block Group 1, Census Tract 5221, Harris County, Texas	76.8%
482015221002	Block Group 2, Census Tract 5221, Harris County, Texas	41.8%
482015221003	Block Group 3, Census Tract 5221, Harris County, Texas	69.0%
482015221004	Block Group 4, Census Tract 5221, Harris County, Texas	74.7%
482015222011	Block Group 1, Census Tract 5222.01, Harris County, Texas	46.1%
482015222012	Block Group 2, Census Tract 5222.01, Harris County, Texas	46.2%
482015222021	Block Group 1, Census Tract 5222.02, Harris County, Texas	31.1%
482015222022	Block Group 2, Census Tract 5222.02, Harris County, Texas	39.6%
482015223011	Block Group 1, Census Tract 5223.01, Harris County, Texas	62.4%
482015223012	Block Group 2, Census Tract 5223.01, Harris County, Texas	71.5%
482015223021	Block Group 1, Census Tract 5223.02, Harris County, Texas	65.0%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block
		Group
		Low or
		Moderate
FIPS Code	Block Group	Income
482015331002	Block Group 2, Census Tract 5331, Harris County, Texas	70.9%
482015331003	Block Group 3, Census Tract 5331, Harris County, Texas	42.0%
482015332001	Block Group 1, Census Tract 5332, Harris County, Texas	80.9%
482015332002	Block Group 2, Census Tract 5332, Harris County, Texas	86.3%
482015332003	Block Group 3, Census Tract 5332, Harris County, Texas	60.2%
482015333001	Block Group 1, Census Tract 5333, Harris County, Texas	65.2%
482015333002	Block Group 2, Census Tract 5333, Harris County, Texas	87.0%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015339022	Block Group 2, Census Tract 5339.02, Harris County, Texas	76.8%
482015340011	Block Group 1, Census Tract 5340.01, Harris County, Texas	81.8%
482015340021	Block Group 1, Census Tract 5340.02, Harris County, Texas	57.9%
482015340022	Block Group 2, Census Tract 5340.02, Harris County, Texas	44.4%
482015340031	Block Group 1, Census Tract 5340.03, Harris County, Texas	43.4%
482015341001	Block Group 1, Census Tract 5341, Harris County, Texas	31.9%
482015341002	Block Group 2, Census Tract 5341, Harris County, Texas	67.9%
482015341003	Block Group 3, Census Tract 5341, Harris County, Texas	28.3%
482015342011	Block Group 1, Census Tract 5342.01, Harris County, Texas	67.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015521023	Block Group 3, Census Tract 5521.02, Harris County, Texas	57.6%
482015521031	Block Group 1, Census Tract 5521.03, Harris County, Texas	28.7%
482015521032	Block Group 2, Census Tract 5521.03, Harris County, Texas	32.6%
482015522001	Block Group 1, Census Tract 5522, Harris County, Texas	24.2%
482015522002	Block Group 2, Census Tract 5522, Harris County, Texas	41.3%
482015522003	Block Group 3, Census Tract 5522, Harris County, Texas	42.9%
482015523011	Block Group 1, Census Tract 5523.01, Harris County, Texas	27.2%
482015523012	Block Group 2, Census Tract 5523.01, Harris County, Texas	20.0%
482015523021	Block Group 1, Census Tract 5523.02, Harris County, Texas	27.5%
482015523022	Block Group 2, Census Tract 5523.02, Harris County, Texas	43.5%
482015524001	Block Group 1, Census Tract 5524, Harris County, Texas	51.5%
482015524002	Block Group 2, Census Tract 5524, Harris County, Texas	17.3%
482015524003	Block Group 3, Census Tract 5524, Harris County, Texas	68.4%
482015525001	Block Group 1, Census Tract 5525, Harris County, Texas	36.3%
482015525002	Block Group 2, Census Tract 5525, Harris County, Texas	32.1%
482015525003	Block Group 3, Census Tract 5525, Harris County, Texas	7.6%
482015526011	Block Group 1, Census Tract 5526.01, Harris County, Texas	60.9%
482015526021	Block Group 1, Census Tract 5526.02, Harris County, Texas	22.9%
482015526022	Block Group 2, Census Tract 5526.02, Harris County, Texas	16.6%
482015527001	Block Group 1, Census Tract 5527, Harris County, Texas	43.4%
482015527002	Block Group 2, Census Tract 5527, Harris County, Texas	48.2%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015530011	Block Group 1, Census Tract 5530.01, Harris County, Texas	9.5%
482015530012	Block Group 2, Census Tract 5530.01, Harris County, Texas	1.7%
482015530013	Block Group 3, Census Tract 5530.01, Harris County, Texas	38.3%
482015530021	Block Group 1, Census Tract 5530.02, Harris County, Texas	78.0%
482015530022	Block Group 2, Census Tract 5530.02, Harris County, Texas	13.0%
482015531001	Block Group 1, Census Tract 5531, Harris County, Texas	20.5%
482015531002	Block Group 2, Census Tract 5531, Harris County, Texas	40.4%
482015531003	Block Group 3, Census Tract 5531, Harris County, Texas	35.9%
482015531004	Block Group 4, Census Tract 5531, Harris County, Texas	52.4%
482015532001	Block Group 1, Census Tract 5532, Harris County, Texas	24.2%
482015532002	Block Group 2, Census Tract 5532, Harris County, Texas	72.3%
482015532003	Block Group 3, Census Tract 5532, Harris County, Texas	81.0%
482015532004	Block Group 4, Census Tract 5532, Harris County, Texas	83.1%
482015533001	Block Group 1, Census Tract 5533, Harris County, Texas	73.8%
482015533002	Block Group 2, Census Tract 5533, Harris County, Texas	52.5%
482015534011	Block Group 1, Census Tract 5534.01, Harris County, Texas	19.4%
482015534012	Block Group 2, Census Tract 5534.01, Harris County, Texas	20.8%
482015534021	Block Group 1, Census Tract 5534.02, Harris County, Texas	38.4%
482015534022	Block Group 2, Census Tract 5534.02, Harris County, Texas	9.5%
482015534023	Block Group 3, Census Tract 5534.02, Harris County, Texas	27.2%
482015534024	Block Group 4, Census Tract 5534.02, Harris County, Texas	5.0%
482015534031	Block Group 1, Census Tract 5534.03, Harris County, Texas	14.8%
482015535001	Block Group 1, Census Tract 5535, Harris County, Texas	34.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015538023	Block Group 3, Census Tract 5538.02, Harris County, Texas	14.0%
482015538024	Block Group 4, Census Tract 5538.02, Harris County, Texas	45.1%
482015539001	Block Group 1, Census Tract 5539, Harris County, Texas	13.6%
482015539002	Block Group 2, Census Tract 5539, Harris County, Texas	16.0%
482015539003	Block Group 3, Census Tract 5539, Harris County, Texas	7.7%
482015539004	Block Group 4, Census Tract 5539, Harris County, Texas	15.2%
482015540011	Block Group 1, Census Tract 5540.01, Harris County, Texas	65.5%
482015540012	Block Group 2, Census Tract 5540.01, Harris County, Texas	16.8%
482015540021	Block Group 1, Census Tract 5540.02, Harris County, Texas	10.7%
482015540022	Block Group 2, Census Tract 5540.02, Harris County, Texas	4.3%
482015541011	Block Group 1, Census Tract 5541.01, Harris County, Texas	16.9%
482015541021	Block Group 1, Census Tract 5541.02, Harris County, Texas	37.0%
482015541022	Block Group 2, Census Tract 5541.02, Harris County, Texas	20.9%
482015541023	Block Group 3, Census Tract 5541.02, Harris County, Texas	20.0%
482015542001	Block Group 1, Census Tract 5542, Harris County, Texas	27.7%
482015542002	Block Group 2, Census Tract 5542, Harris County, Texas	32.4%
482015542003	Block Group 3, Census Tract 5542, Harris County, Texas	45.5%
482015543011	Block Group 1, Census Tract 5543.01, Harris County, Texas	2.2%
482015543012	Block Group 2, Census Tract 5543.01, Harris County, Texas	3.3%
482015543013	Block Group 3, Census Tract 5543.01, Harris County, Texas	9.7%
482015543014	Block Group 4, Census Tract 5543.01, Harris County, Texas	7.1%
482015543021	Block Group 1, Census Tract 5543.02, Harris County, Texas	41.9%
482015543022	Block Group 2, Census Tract 5543.02, Harris County, Texas	22.0%
482015544011	Block Group 1, Census Tract 5544.01, Harris County, Texas	5.5%
482015544012	Block Group 2, Census Tract 5544.01, Harris County, Texas	9.8%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015545023	Block Group 3, Census Tract 5545.02, Harris County, Texas	1.5%
482015546001	Block Group 1, Census Tract 5546, Harris County, Texas	8.4%
482015546002	Block Group 2, Census Tract 5546, Harris County, Texas	4.0%
482015547001	Block Group 1, Census Tract 5547, Harris County, Texas	33.7%
482015547002	Block Group 2, Census Tract 5547, Harris County, Texas	8.7%
482015548011	Block Group 1, Census Tract 5548.01, Harris County, Texas	30.1%
482015548021	Block Group 1, Census Tract 5548.02, Harris County, Texas	17.1%
482015548022	Block Group 2, Census Tract 5548.02, Harris County, Texas	15.4%
482015549011	Block Group 1, Census Tract 5549.01, Harris County, Texas	33.8%
482015549012	Block Group 2, Census Tract 5549.01, Harris County, Texas	32.8%
482015549021	Block Group 1, Census Tract 5549.02, Harris County, Texas	10.9%
482015549022	Block Group 2, Census Tract 5549.02, Harris County, Texas	0.2%
482015549031	Block Group 1, Census Tract 5549.03, Harris County, Texas	5.9%
482015550001	Block Group 1, Census Tract 5550, Harris County, Texas	21.4%
482015550002	Block Group 2, Census Tract 5550, Harris County, Texas	10.9%
482015550003	Block Group 3, Census Tract 5550, Harris County, Texas	23.6%
482015551001	Block Group 1, Census Tract 5551, Harris County, Texas	21.6%
482015551002	Block Group 2, Census Tract 5551, Harris County, Texas	21.7%
482015551003	Block Group 3, Census Tract 5551, Harris County, Texas	24.8%
482015552001	Block Group 1, Census Tract 5552, Harris County, Texas	48.2%
482015552002	Block Group 2, Census Tract 5552, Harris County, Texas	31.2%
482015553011	Block Group 1, Census Tract 5553.01, Harris County, Texas	5.0%
482015553021	Block Group 1, Census Tract 5553.02, Harris County, Texas	12.3%
482015553022	Block Group 2, Census Tract 5553.02, Harris County, Texas	20.8%
482015553031	Block Group 1, Census Tract 5553.03, Harris County, Texas	25.2%
482015554011	Block Group 1, Census Tract 5554.01, Harris County, Texas	42.3%
482015554021	Block Group 1, Census Tract 5554.02, Harris County, Texas	42.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482015555021	Block Group 1, Census Tract 5555.02, Harris County, Texas	24.5%
482015555022	Block Group 2, Census Tract 5555.02, Harris County, Texas	16.2%
482015556001	Block Group 1, Census Tract 5556, Harris County, Texas	33.4%
482015556002	Block Group 2, Census Tract 5556, Harris County, Texas	14.6%
482015557011	Block Group 1, Census Tract 5557.01, Harris County, Texas	14.6%
482015557012	Block Group 2, Census Tract 5557.01, Harris County, Texas	9.5%
482015557021	Block Group 1, Census Tract 5557.02, Harris County, Texas	7.5%
482015560001	Block Group 1, Census Tract 5560, Harris County, Texas	36.5%
482015560002	Block Group 2, Census Tract 5560, Harris County, Texas	34.4%
482015560003	Block Group 3, Census Tract 5560, Harris County, Texas	54.1%
482019800001	Block Group 1, Census Tract 9800, Harris County, Texas	50.0%
482019801001	Block Group 1, Census Tract 9801, Harris County, Texas	100.0%
482399501001	Block Group 1, Census Tract 9501, Jackson County, Texas	34.3%
482399501002	Block Group 2, Census Tract 9501, Jackson County, Texas	44.0%
482399501003	Block Group 3, Census Tract 9501, Jackson County, Texas	43.0%
482399501004	Block Group 4, Census Tract 9501, Jackson County, Texas	21.4%
482399502001	Block Group 1, Census Tract 9502, Jackson County, Texas	45.8%
482399502002	Block Group 2, Census Tract 9502, Jackson County, Texas	46.3%
482399502003	Block Group 3, Census Tract 9502, Jackson County, Texas	28.5%
482399503001	Block Group 1, Census Tract 9503, Jackson County, Texas	48.1%
482399503002	Block Group 2, Census Tract 9503, Jackson County, Texas	29.1%
482399503003	Block Group 3, Census Tract 9503, Jackson County, Texas	36.4%
482399503004	Block Group 4, Census Tract 9503, Jackson County, Texas	43.1%
482419501001	Block Group 1, Census Tract 9501, Jasper County, Texas	41.2%
482419501002	Block Group 2, Census Tract 9501, Jasper County, Texas	32.9%
482419501003	Block Group 3, Census Tract 9501, Jasper County, Texas	38.5%
482419501004	Block Group 4, Census Tract 9501, Jasper County, Texas	44.2%
482419502001	Block Group 1, Census Tract 9502, Jasper County, Texas	88.4%
482419502002	Block Group 2, Census Tract 9502, Jasper County, Texas	23.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482419503002	Block Group 2, Census Tract 9503, Jasper County, Texas	62.7%
482419503003	Block Group 3, Census Tract 9503, Jasper County, Texas	53.1%
482419504001	Block Group 1, Census Tract 9504, Jasper County, Texas	44.4%
482419504002	Block Group 2, Census Tract 9504, Jasper County, Texas	28.8%
482419504003	Block Group 3, Census Tract 9504, Jasper County, Texas	25.6%
482419505001	Block Group 1, Census Tract 9505, Jasper County, Texas	42.5%
482419505002	Block Group 2, Census Tract 9505, Jasper County, Texas	55.2%
482419505003	Block Group 3, Census Tract 9505, Jasper County, Texas	43.5%
482419505004	Block Group 4, Census Tract 9505, Jasper County, Texas	30.4%
482419506001	Block Group 1, Census Tract 9506, Jasper County, Texas	29.2%
482419506002	Block Group 2, Census Tract 9506, Jasper County, Texas	65.3%
482419507001	Block Group 1, Census Tract 9507, Jasper County, Texas	42.3%
482419507002	Block Group 2, Census Tract 9507, Jasper County, Texas	18.9%
482419507003	Block Group 3, Census Tract 9507, Jasper County, Texas	24.7%
482419507004	Block Group 4, Census Tract 9507, Jasper County, Texas	21.2%
482419507005	Block Group 5, Census Tract 9507, Jasper County, Texas	34.1%
482419508001	Block Group 1, Census Tract 9508, Jasper County, Texas	28.9%
482419508002	Block Group 2, Census Tract 9508, Jasper County, Texas	42.4%
482450001011	Block Group 1, Census Tract 1.01, Jefferson County, Texas	46.2%
482450001012	Block Group 2, Census Tract 1.01, Jefferson County, Texas	23.2%
482450001021	Block Group 1, Census Tract 1.02, Jefferson County, Texas	34.9%
482450001031	Block Group 1, Census Tract 1.03, Jefferson County, Texas	65.9%
482450001032	Block Group 2, Census Tract 1.03, Jefferson County, Texas	84.5%
482450002001	Block Group 1, Census Tract 2, Jefferson County, Texas	21.3%
482450002002	Block Group 2, Census Tract 2, Jefferson County, Texas	40.1%
482450002003	Block Group 3, Census Tract 2, Jefferson County, Texas	55.8%
482450003021	Block Group 1, Census Tract 3.02, Jefferson County, Texas	22.4%
482450003022	Block Group 2, Census Tract 3.02, Jefferson County, Texas	12.8%
482450003023	Block Group 3, Census Tract 3.02, Jefferson County, Texas	13.9%
482450003041	Block Group 1, Census Tract 3.04, Jefferson County, Texas	30.8%
482450003042	Block Group 2, Census Tract 3.04, Jefferson County, Texas	30.8%
482450003043	Block Group 3, Census Tract 3.04, Jefferson County, Texas	36.9%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482450003044	Block Group 4, Census Tract 3.04, Jefferson County, Texas	23.0%
482450003045	Block Group 5, Census Tract 3.04, Jefferson County, Texas	14.8%
482450003061	Block Group 1, Census Tract 3.06, Jefferson County, Texas	7.9%
482450003062	Block Group 2, Census Tract 3.06, Jefferson County, Texas	21.9%
482450003063	Block Group 3, Census Tract 3.06, Jefferson County, Texas	37.7%
482450003064	Block Group 4, Census Tract 3.06, Jefferson County, Texas	7.5%
482450003071	Block Group 1, Census Tract 3.07, Jefferson County, Texas	24.5%
482450003081	Block Group 1, Census Tract 3.08, Jefferson County, Texas	20.6%
482450003082	Block Group 2, Census Tract 3.08, Jefferson County, Texas	47.6%
482450003083	Block Group 3, Census Tract 3.08, Jefferson County, Texas	68.5%
482450003091	Block Group 1, Census Tract 3.09, Jefferson County, Texas	35.4%
482450003101	Block Group 1, Census Tract 3.10, Jefferson County, Texas	14.3%
482450003102	Block Group 2, Census Tract 3.10, Jefferson County, Texas	31.4%
482450003103	Block Group 3, Census Tract 3.10, Jefferson County, Texas	47.1%
482450003104	Block Group 4, Census Tract 3.10, Jefferson County, Texas	4.4%
482450003105	Block Group 5, Census Tract 3.10, Jefferson County, Texas	9.8%
482450004001	Block Group 1, Census Tract 4, Jefferson County, Texas	73.2%
482450004002	Block Group 2, Census Tract 4, Jefferson County, Texas	85.5%
482450004003	Block Group 3, Census Tract 4, Jefferson County, Texas	13.8%
482450004004	Block Group 4, Census Tract 4, Jefferson County, Texas	22.9%
482450005001	Block Group 1, Census Tract 5, Jefferson County, Texas	40.1%
482450005002	Block Group 2, Census Tract 5, Jefferson County, Texas	47.4%
482450006001	Block Group 1, Census Tract 6, Jefferson County, Texas	35.5%
482450006002	Block Group 2, Census Tract 6, Jefferson County, Texas	87.6%
482450006003	Block Group 3, Census Tract 6, Jefferson County, Texas	77.3%
482450006004	Block Group 4, Census Tract 6, Jefferson County, Texas	57.5%
482450006005	Block Group 5, Census Tract 6, Jefferson County, Texas	48.5%
482450006006	Block Group 6, Census Tract 6, Jefferson County, Texas	67.5%
482450007001	Block Group 1, Census Tract 7, Jefferson County, Texas	55.3%
482450007002	Block Group 2, Census Tract 7, Jefferson County, Texas	100.0%
482450007003	Block Group 3, Census Tract 7, Jefferson County, Texas	85.9%
482450007004	Block Group 4, Census Tract 7, Jefferson County, Texas	89.2%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482450064001	Block Group 1, Census Tract 64, Jefferson County, Texas	59.1%
482450064002	Block Group 2, Census Tract 64, Jefferson County, Texas	49.6%
482450065001	Block Group 1, Census Tract 65, Jefferson County, Texas	57.8%
482450065002	Block Group 2, Census Tract 65, Jefferson County, Texas	52.3%
482450065003	Block Group 3, Census Tract 65, Jefferson County, Texas	82.8%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
482917010002	Block Group 2, Census Tract 7010, Liberty County, Texas	47.3%
482917010003	Block Group 3, Census Tract 7010, Liberty County, Texas	42.0%
482917011001	Block Group 1, Census Tract 7011, Liberty County, Texas	22.3%
482917011002	Block Group 2, Census Tract 7011, Liberty County, Texas	42.0%
482917011003	Block Group 3, Census Tract 7011, Liberty County, Texas	35.9%
482917011004	Block Group 4, Census Tract 7011, Liberty County, Texas	51.1%
482917012001	Block Group 1, Census Tract 7012, Liberty County, Texas	31.0%
482917012002	Block Group 2, Census Tract 7012, Liberty County, Texas	72.9%
482917012003	Block Group 3, Census Tract 7012, Liberty County, Texas	37.8%
482917012004	Block Group 4, Census Tract 7012, Liberty County, Texas	43.4%
482917012005	Block Group 5, Census Tract 7012, Liberty County, Texas	66.0%
482917013001	Block Group 1, Census Tract 7013, Liberty County, Texas	51.5%
482917013002	Block Group 2, Census Tract 7013, Liberty County, Texas	39.5%
482917013003	Block Group 3, Census Tract 7013, Liberty County, Texas	43.2%
482917013004	Block Group 4, Census Tract 7013, Liberty County, Texas	43.1%
482917014001	Block Group 1, Census Tract 7014, Liberty County, Texas	26.0%
482917014002	Block Group 2, Census Tract 7014, Liberty County, Texas	53.5%
482917014003	Block Group 3, Census Tract 7014, Liberty County, Texas	42.3%
482917014004	Block Group 4, Census Tract 7014, Liberty County, Texas	51.2%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483217301001	Block Group 1, Census Tract 7301, Matagorda County, Texas	42.1%
483217301002	Block Group 2, Census Tract 7301, Matagorda County, Texas	95.3%
483217301003	Block Group 3, Census Tract 7301, Matagorda County, Texas	23.1%
483217302011	Block Group 1, Census Tract 7302.01, Matagorda County, Texas	22.2%
483217302012	Block Group 2, Census Tract 7302.01, Matagorda County, Texas	20.5%
483217302013	Block Group 3, Census Tract 7302.01, Matagorda County, Texas	26.9%
483217302014	Block Group 4, Census Tract 7302.01, Matagorda County, Texas	51.7%
483217302015	Block Group 5, Census Tract 7302.01, Matagorda County, Texas	47.2%
483217302016	Block Group 6, Census Tract 7302.01, Matagorda County, Texas	65.1%
483217302017	Block Group 7, Census Tract 7302.01, Matagorda County, Texas	45.6%
483217302021	Block Group 1, Census Tract 7302.02, Matagorda County, Texas	9.7%
483217303011	Block Group 1, Census Tract 7303.01, Matagorda County, Texas	26.7%
483217303012	Block Group 2, Census Tract 7303.01, Matagorda County, Texas	52.4%
483217303013	Block Group 3, Census Tract 7303.01, Matagorda County, Texas	37.0%
483217303014	Block Group 4, Census Tract 7303.01, Matagorda County, Texas	36.0%
483217303021	Block Group 1, Census Tract 7303.02, Matagorda County, Texas	62.1%
483217303022	Block Group 2, Census Tract 7303.02, Matagorda County, Texas	56.1%
483217303023	Block Group 3, Census Tract 7303.02, Matagorda County, Texas	60.1%
483217303031	Block Group 1, Census Tract 7303.03, Matagorda County, Texas	14.5%
483217304001	Block Group 1, Census Tract 7304, Matagorda County, Texas	51.7%
483217304002	Block Group 2, Census Tract 7304, Matagorda County, Texas	50.0%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483217307002	Block Group 2, Census Tract 7307, Matagorda County, Texas	45.9%
483217307003	Block Group 3, Census Tract 7307, Matagorda County, Texas	37.7%
483217307004	Block Group 4, Census Tract 7307, Matagorda County, Texas	35.2%
483219900000	Block Group 0, Census Tract 9900, Matagorda County, Texas	0.0%
483319501001	Block Group 1, Census Tract 9501, Milam County, Texas	29.2%
483319501002	Block Group 2, Census Tract 9501, Milam County, Texas	52.5%
483319503001	Block Group 1, Census Tract 9503, Milam County, Texas	19.8%
483319503002	Block Group 2, Census Tract 9503, Milam County, Texas	15.9%
483319503003	Block Group 3, Census Tract 9503, Milam County, Texas	49.4%
483319504011	Block Group 1, Census Tract 9504.01, Milam County, Texas	55.6%
483319504012	Block Group 2, Census Tract 9504.01, Milam County, Texas	26.0%
483319504021	Block Group 1, Census Tract 9504.02, Milam County, Texas	55.6%
483319504022	Block Group 2, Census Tract 9504.02, Milam County, Texas	56.3%
483319505001	Block Group 1, Census Tract 9505, Milam County, Texas	47.2%
483319505002	Block Group 2, Census Tract 9505, Milam County, Texas	40.1%
483319505003	Block Group 3, Census Tract 9505, Milam County, Texas	42.5%
483319507001	Block Group 1, Census Tract 9507, Milam County, Texas	48.6%
483319507002	Block Group 2, Census Tract 9507, Milam County, Texas	76.4%
483319507003	Block Group 3, Census Tract 9507, Milam County, Texas	56.5%
483319507004	Block Group 4, Census Tract 9507, Milam County, Texas	66.5%
483319507005	Block Group 5, Census Tract 9507, Milam County, Texas	24.7%
483319507006	Block Group 6, Census Tract 9507, Milam County, Texas	48.9%
483319508001	Block Group 1, Census Tract 9508, Milam County, Texas	35.9%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483396902021	Block Group 1, Census Tract 6902.02, Montgomery County, Texas	42.9%
483396902022	Block Group 2, Census Tract 6902.02, Montgomery County, Texas	5.9%
483396902023	Block Group 3, Census Tract 6902.02, Montgomery County, Texas	71.5%
483396902024	Block Group 4, Census Tract 6902.02, Montgomery County, Texas	69.5%
483396902025	Block Group 5, Census Tract 6902.02, Montgomery County, Texas	39.7%
483396903001	Block Group 1, Census Tract 6903, Montgomery County, Texas	61.7%
483396903002	Block Group 2, Census Tract 6903, Montgomery County, Texas	34.8%
483396903003	Block Group 3, Census Tract 6903, Montgomery County, Texas	26.1%
483396904011	Block Group 1, Census Tract 6904.01, Montgomery County, Texas	20.4%
483396904012	Block Group 2, Census Tract 6904.01, Montgomery County, Texas	14.1%
483396904021	Block Group 1, Census Tract 6904.02, Montgomery County, Texas	14.8%
483396904022	Block Group 2, Census Tract 6904.02, Montgomery County, Texas	40.8%
483396904023	Block Group 3, Census Tract 6904.02, Montgomery County, Texas	12.2%
483396904024	Block Group 4, Census Tract 6904.02, Montgomery County, Texas	12.8%
483396904025	Block Group 5, Census Tract 6904.02, Montgomery County, Texas	65.7%
483396905001	Block Group 1, Census Tract 6905, Montgomery County, Texas	14.8%
483396905002	Block Group 2, Census Tract 6905, Montgomery County, Texas	8.7%
483396906011	Block Group 1, Census Tract 6906.01, Montgomery County, Texas	12.5%
483396906012	Block Group 2, Census Tract 6906.01, Montgomery County, Texas	10.3%
483396906013	Block Group 3, Census Tract 6906.01, Montgomery County, Texas	14.1%
483396906014	Block Group 4, Census Tract 6906.01, Montgomery County, Texas	18.2%
483396906015	Block Group 5, Census Tract 6906.01, Montgomery County, Texas	17.5%
483396906016	Block Group 6, Census Tract 6906.01, Montgomery County, Texas	3.7%
483396906021	Block Group 1, Census Tract 6906.02, Montgomery County, Texas	7.9%
483396906022	Block Group 2, Census Tract 6906.02, Montgomery County, Texas	17.6%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483396909002	Block Group 2, Census Tract 6909, Montgomery County, Texas	5.1%
483396910001	Block Group 1, Census Tract 6910, Montgomery County, Texas	7.1%
483396910002	Block Group 2, Census Tract 6910, Montgomery County, Texas	5.0%
483396911001	Block Group 1, Census Tract 6911, Montgomery County, Texas	17.7%
483396911002	Block Group 2, Census Tract 6911, Montgomery County, Texas	23.4%
483396912001	Block Group 1, Census Tract 6912, Montgomery County, Texas	14.5%
483396912002	Block Group 2, Census Tract 6912, Montgomery County, Texas	46.1%
483396912003	Block Group 3, Census Tract 6912, Montgomery County, Texas	3.4%
483396913011	Block Group 1, Census Tract 6913.01, Montgomery County, Texas	16.3%
483396913012	Block Group 2, Census Tract 6913.01, Montgomery County, Texas	7.1%
483396913021	Block Group 1, Census Tract 6913.02, Montgomery County, Texas	44.9%
483396913022	Block Group 2, Census Tract 6913.02, Montgomery County, Texas	37.7%
483396914001	Block Group 1, Census Tract 6914, Montgomery County, Texas	32.3%
483396914002	Block Group 2, Census Tract 6914, Montgomery County, Texas	31.0%
483396914003	Block Group 3, Census Tract 6914, Montgomery County, Texas	47.7%
483396915001	Block Group 1, Census Tract 6915, Montgomery County, Texas	10.2%
483396915002	Block Group 2, Census Tract 6915, Montgomery County, Texas	20.2%
483396915003	Block Group 3, Census Tract 6915, Montgomery County, Texas	20.1%
483396915004	Block Group 4, Census Tract 6915, Montgomery County, Texas	67.0%
483396916011	Block Group 1, Census Tract 6916.01, Montgomery County, Texas	31.9%
483396916012	Block Group 2, Census Tract 6916.01, Montgomery County, Texas	6.0%
483396916021	Block Group 1, Census Tract 6916.02, Montgomery County, Texas	40.5%
483396916022	Block Group 2, Census Tract 6916.02, Montgomery County, Texas	25.6%
483396917001	Block Group 1, Census Tract 6917, Montgomery County, Texas	36.9%
483396918001	Block Group 1, Census Tract 6918, Montgomery County, Texas	28.8%
483396918002	Block Group 2, Census Tract 6918, Montgomery County, Texas	23.9%
483396918003	Block Group 3, Census Tract 6918, Montgomery County, Texas	13.3%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483396920011	Block Group 1, Census Tract 6920.01, Montgomery County, Texas	11.4%
483396920012	Block Group 2, Census Tract 6920.01, Montgomery County, Texas	17.4%
483396920013	Block Group 3, Census Tract 6920.01, Montgomery County, Texas	30.7%
483396920014	Block Group 4, Census Tract 6920.01, Montgomery County, Texas	20.1%
483396920015	Block Group 5, Census Tract 6920.01, Montgomery County, Texas	20.0%
483396920016	Block Group 6, Census Tract 6920.01, Montgomery County, Texas	20.2%
483396920021	Block Group 1, Census Tract 6920.02, Montgomery County, Texas	1.0%
483396920022	Block Group 2, Census Tract 6920.02, Montgomery County, Texas	10.6%
483396921001	Block Group 1, Census Tract 6921, Montgomery County, Texas	46.9%
483396921002	Block Group 2, Census Tract 6921, Montgomery County, Texas	17.5%
483396921003	Block Group 3, Census Tract 6921, Montgomery County, Texas	5.3%
483396922001	Block Group 1, Census Tract 6922, Montgomery County, Texas	51.4%
483396922002	Block Group 2, Census Tract 6922, Montgomery County, Texas	29.2%
483396922003	Block Group 3, Census Tract 6922, Montgomery County, Texas	60.2%
483396922004	Block Group 4, Census Tract 6922, Montgomery County, Texas	21.7%
483396923001	Block Group 1, Census Tract 6923, Montgomery County, Texas	59.4%
483396923002	Block Group 2, Census Tract 6923, Montgomery County, Texas	67.1%
483396923003	Block Group 3, Census Tract 6923, Montgomery County, Texas	14.3%
483396923004	Block Group 4, Census Tract 6923, Montgomery County, Texas	18.5%
483396923005	Block Group 5, Census Tract 6923, Montgomery County, Texas	24.4%
483396924001	Block Group 1, Census Tract 6924, Montgomery County, Texas	42.7%
483396924002	Block Group 2, Census Tract 6924, Montgomery County, Texas	45.3%
483396924003	Block Group 3, Census Tract 6924, Montgomery County, Texas	39.3%
483396925001	Block Group 1, Census Tract 6925, Montgomery County, Texas	48.9%
483396925002	Block Group 2, Census Tract 6925, Montgomery County, Texas	31.1%
483396925003	Block Group 3, Census Tract 6925, Montgomery County, Texas	46.8%
483396925004	Block Group 4, Census Tract 6925, Montgomery County, Texas	51.3%
483396926011	Block Group 1, Census Tract 6926.01, Montgomery County, Texas	42.7%
483396926012	Block Group 2, Census Tract 6926.01, Montgomery County, Texas	73.6%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483396927001	Block Group 1, Census Tract 6927, Montgomery County, Texas	43.3%
483396927002	Block Group 2, Census Tract 6927, Montgomery County, Texas	31.7%
483396927003	Block Group 3, Census Tract 6927, Montgomery County, Texas	31.9%
483396928011	Block Group 1, Census Tract 6928.01, Montgomery County, Texas	28.2%
483396928012	Block Group 2, Census Tract 6928.01, Montgomery County, Texas	38.0%
483396928013	Block Group 3, Census Tract 6928.01, Montgomery County, Texas	64.0%
483396928014	Block Group 4, Census Tract 6928.01, Montgomery County, Texas	44.4%
483396928021	Block Group 1, Census Tract 6928.02, Montgomery County, Texas	57.0%
483396928022	Block Group 2, Census Tract 6928.02, Montgomery County, Texas	37.2%
483396928023	Block Group 3, Census Tract 6928.02, Montgomery County, Texas	21.4%
483396929001	Block Group 1, Census Tract 6929, Montgomery County, Texas	58.1%
483396929002	Block Group 2, Census Tract 6929, Montgomery County, Texas	32.1%
483396930001	Block Group 1, Census Tract 6930, Montgomery County, Texas	62.1%
483396930002	Block Group 2, Census Tract 6930, Montgomery County, Texas	61.5%
483396930003	Block Group 3, Census Tract 6930, Montgomery County, Texas	74.8%
483396930004	Block Group 4, Census Tract 6930, Montgomery County, Texas	63.2%
483396931011	Block Group 1, Census Tract 6931.01, Montgomery County, Texas	100.0%
483396931012	Block Group 2, Census Tract 6931.01, Montgomery County, Texas	88.4%
483396931013	Block Group 3, Census Tract 6931.01, Montgomery County, Texas	50.3%
483396931014	Block Group 4, Census Tract 6931.01, Montgomery County, Texas	71.5%
483396931021	Block Group 1, Census Tract 6931.02, Montgomery County, Texas	55.1%
483396931022	Block Group 2, Census Tract 6931.02, Montgomery County, Texas	58.3%
483396932001	Block Group 1, Census Tract 6932, Montgomery County, Texas	32.1%
483396932002	Block Group 2, Census Tract 6932, Montgomery County, Texas	11.8%
483396932003	Block Group 3, Census Tract 6932, Montgomery County, Texas	33.6%
483396932004	Block Group 4, Census Tract 6932, Montgomery County, Texas	10.6%
483396933001	Block Group 1, Census Tract 6933, Montgomery County, Texas	74.6%
483396933002	Block Group 2, Census Tract 6933, Montgomery County, Texas	25.7%
483396933003	Block Group 3, Census Tract 6933, Montgomery County, Texas	38.8%
483396934001	Block Group 1, Census Tract 6934, Montgomery County, Texas	79.6%
483396934002	Block Group 2, Census Tract 6934, Montgomery County, Texas	67.7%
483396934003	Block Group 3, Census Tract 6934, Montgomery County, Texas	95.7%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483396935001	Block Group 1, Census Tract 6935, Montgomery County, Texas	45.8%
483396935002	Block Group 2, Census Tract 6935, Montgomery County, Texas	60.9%
483396935003	Block Group 3, Census Tract 6935, Montgomery County, Texas	74.4%
483396935004	Block Group 4, Census Tract 6935, Montgomery County, Texas	68.5%
483396936001	Block Group 1, Census Tract 6936, Montgomery County, Texas	40.3%
483396936002	Block Group 2, Census Tract 6936, Montgomery County, Texas	40.9%
483396937001	Block Group 1, Census Tract 6937, Montgomery County, Texas	35.9%
483396937002	Block Group 2, Census Tract 6937, Montgomery County, Texas	20.9%
483396938001	Block Group 1, Census Tract 6938, Montgomery County, Texas	60.3%
483396939001	Block Group 1, Census Tract 6939, Montgomery County, Texas	79.9%
483396939002	Block Group 2, Census Tract 6939, Montgomery County, Texas	78.9%
483396939003	Block Group 3, Census Tract 6939, Montgomery County, Texas	45.4%
483396939004	Block Group 4, Census Tract 6939, Montgomery County, Texas	71.4%
483396939005	Block Group 5, Census Tract 6939, Montgomery County, Texas	48.4%
483396939006	Block Group 6, Census Tract 6939, Montgomery County, Texas	87.8%
483396940001	Block Group 1, Census Tract 6940, Montgomery County, Texas	38.3%
483396940002	Block Group 2, Census Tract 6940, Montgomery County, Texas	35.9%
483396940003	Block Group 3, Census Tract 6940, Montgomery County, Texas	48.2%
483396940004	Block Group 4, Census Tract 6940, Montgomery County, Texas	41.3%
483396941011	Block Group 1, Census Tract 6941.01, Montgomery County, Texas	76.2%
483396941012	Block Group 2, Census Tract 6941.01, Montgomery County, Texas	43.9%
483396941013	Block Group 3, Census Tract 6941.01, Montgomery County, Texas	78.1%
483396941014	Block Group 4, Census Tract 6941.01, Montgomery County, Texas	56.5%
483396941015	Block Group 5, Census Tract 6941.01, Montgomery County, Texas	48.4%
483396941021	Block Group 1, Census Tract 6941.02, Montgomery County, Texas	42.6%
483396941022	Block Group 2, Census Tract 6941.02, Montgomery County, Texas	43.1%
483396942011	Block Group 1, Census Tract 6942.01, Montgomery County, Texas	74.3%
483396942012	Block Group 2, Census Tract 6942.01, Montgomery County, Texas	29.1%
483396942013	Block Group 3, Census Tract 6942.01, Montgomery County, Texas	32.0%
483396942021	Block Group 1, Census Tract 6942.02, Montgomery County, Texas	20.4%
483396942022	Block Group 2, Census Tract 6942.02, Montgomery County, Texas	27.0%
483396942023	Block Group 3, Census Tract 6942.02, Montgomery County, Texas	9.2%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
483550014001	Block Group 1, Census Tract 14, Nueces County, Texas	36.3%
483550014002	Block Group 2, Census Tract 14, Nueces County, Texas	12.6%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483550058023	Block Group 3, Census Tract 58.02, Nueces County, Texas	28.0%
483550059001	Block Group 1, Census Tract 59, Nueces County, Texas	60.9%
483550059002	Block Group 2, Census Tract 59, Nueces County, Texas	40.4%
483550060001	Block Group 1, Census Tract 60, Nueces County, Texas	27.0%
483550060002	Block Group 2, Census Tract 60, Nueces County, Texas	35.6%
483550061001	Block Group 1, Census Tract 61, Nueces County, Texas	76.8%
483550061002	Block Group 2, Census Tract 61, Nueces County, Texas	29.4%
483550061003	Block Group 3, Census Tract 61, Nueces County, Texas	21.6%
483550062001	Block Group 1, Census Tract 62, Nueces County, Texas	48.8%
483550062002	Block Group 2, Census Tract 62, Nueces County, Texas	16.0%
483550062003	Block Group 3, Census Tract 62, Nueces County, Texas	13.2%
483550063001	Block Group 1, Census Tract 63, Nueces County, Texas	39.1%
483550063002	Block Group 2, Census Tract 63, Nueces County, Texas	45.8%
483550064001	Block Group 1, Census Tract 64, Nueces County, Texas	90.3%
483550064002	Block Group 2, Census Tract 64, Nueces County, Texas	62.2%
483550064003	Block Group 3, Census Tract 64, Nueces County, Texas	90.0%
483559800001	Block Group 1, Census Tract 9800, Nueces County, Texas	0.0%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483610207004	Block Group 4, Census Tract 207, Orange County, Texas	67.0%
483610208001	Block Group 1, Census Tract 208, Orange County, Texas	50.5%
483610208002	Block Group 2, Census Tract 208, Orange County, Texas	36.1%
483610209001	Block Group 1, Census Tract 209, Orange County, Texas	54.6%
483610209002	Block Group 2, Census Tract 209, Orange County, Texas	54.5%
483610209003	Block Group 3, Census Tract 209, Orange County, Texas	58.9%
483610209004	Block Group 4, Census Tract 209, Orange County, Texas	27.4%
483610210001	Block Group 1, Census Tract 210, Orange County, Texas	27.8%
483610211001	Block Group 1, Census Tract 211, Orange County, Texas	17.5%
483610212001	Block Group 1, Census Tract 212, Orange County, Texas	47.6%
483610212002	Block Group 2, Census Tract 212, Orange County, Texas	26.1%
483610212003	Block Group 3, Census Tract 212, Orange County, Texas	19.3%
483610213001	Block Group 1, Census Tract 213, Orange County, Texas	18.3%
483610213002	Block Group 2, Census Tract 213, Orange County, Texas	25.2%
483610213003	Block Group 3, Census Tract 213, Orange County, Texas	29.2%
483610214001	Block Group 1, Census Tract 214, Orange County, Texas	14.8%
483610214002	Block Group 2, Census Tract 214, Orange County, Texas	29.0%
483610215011	Block Group 1, Census Tract 215.01, Orange County, Texas	20.4%
483610215021	Block Group 1, Census Tract 215.02, Orange County, Texas	53.9%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483610219003	Block Group 3, Census Tract 219, Orange County, Texas	48.0%
483610219004	Block Group 4, Census Tract 219, Orange County, Texas	36.5%
483610219005	Block Group 5, Census Tract 219, Orange County, Texas	54.8%
483610219006	Block Group 6, Census Tract 219, Orange County, Texas	22.7%
483610220001	Block Group 1, Census Tract 220, Orange County, Texas	53.2%
483610220002	Block Group 2, Census Tract 220, Orange County, Texas	36.8%
483610220003	Block Group 3, Census Tract 220, Orange County, Texas	38.5%
483610222001	Block Group 1, Census Tract 222, Orange County, Texas	8.2%
483610222002	Block Group 2, Census Tract 222, Orange County, Texas	26.8%
483610223001	Block Group 1, Census Tract 223, Orange County, Texas	7.1%
483610223002	Block Group 2, Census Tract 223, Orange County, Texas	21.8%
483610223003	Block Group 3, Census Tract 223, Orange County, Texas	31.5%
483610223004	Block Group 4, Census Tract 223, Orange County, Texas	8.6%
483610223005	Block Group 5, Census Tract 223, Orange County, Texas	12.6%
483610224001	Block Group 1, Census Tract 224, Orange County, Texas	17.9%
483610224002	Block Group 2, Census Tract 224, Orange County, Texas	53.6%
483610224003	Block Group 3, Census Tract 224, Orange County, Texas	62.1%
483610224004	Block Group 4, Census Tract 224, Orange County, Texas	17.6%
483610224005	Block Group 5, Census Tract 224, Orange County, Texas	9.0%
483732101011	Block Group 1, Census Tract 2101.01, Polk County, Texas	39.3%
483732101012	Block Group 2, Census Tract 2101.01, Polk County, Texas	51.8%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
483732102052	Block Group 2, Census Tract 2102.05, Polk County, Texas	37.4%
483732102061	Block Group 1, Census Tract 2102.06, Polk County, Texas	56.4%
483732102062	Block Group 2, Census Tract 2102.06, Polk County, Texas	39.7%
483732102063	Block Group 3, Census Tract 2102.06, Polk County, Texas	21.7%
483732103011	Block Group 1, Census Tract 2103.01, Polk County, Texas	33.6%
483732103012	Block Group 2, Census Tract 2103.01, Polk County, Texas	66.7%
483732103013	Block Group 3, Census Tract 2103.01, Polk County, Texas	70.0%
483732103021	Block Group 1, Census Tract 2103.02, Polk County, Texas	46.9%
483732103022	Block Group 2, Census Tract 2103.02, Polk County, Texas	48.5%
483732103023	Block Group 3, Census Tract 2103.02, Polk County, Texas	79.0%
483732103024	Block Group 4, Census Tract 2103.02, Polk County, Texas	51.2%
483732104001	Block Group 1, Census Tract 2104, Polk County, Texas	57.9%
483732104002	Block Group 2, Census Tract 2104, Polk County, Texas	41.2%
483732104003	Block Group 3, Census Tract 2104, Polk County, Texas	47.1%
483732104004	Block Group 4, Census Tract 2104, Polk County, Texas	21.7%
483732105001	Block Group 1, Census Tract 2105, Polk County, Texas	58.6%
483732105002	Block Group 2, Census Tract 2105, Polk County, Texas	42.3%
483732105003	Block Group 3, Census Tract 2105, Polk County, Texas	52.0%
483919502001	Block Group 1, Census Tract 9502, Refugio County, Texas	18.8%
483919502002	Block Group 2, Census Tract 9502, Refugio County, Texas	30.2%
483919502003	Block Group 3, Census Tract 9502, Refugio County, Texas	66.7%
483919502004	Block Group 4, Census Tract 9502, Refugio County, Texas	72.6%
483919504001	Block Group 1, Census Tract 9504, Refugio County, Texas	24.4%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
484039503002	Block Group 2, Census Tract 9503, Sabine County, Texas	55.1%
484039503003	Block Group 3, Census Tract 9503, Sabine County, Texas	57.0%
484039503004	Block Group 4, Census Tract 9503, Sabine County, Texas	38.0%
484039503005	Block Group 5, Census Tract 9503, Sabine County, Texas	35.0%
484059501001	Block Group 1, Census Tract 9501, San Augustine County, Texas	40.0%
484059501002	Block Group 2, Census Tract 9501, San Augustine County, Texas	55.2%
484059501003	Block Group 3, Census Tract 9501, San Augustine County, Texas	35.4%
484059502001	Block Group 1, Census Tract 9502, San Augustine County, Texas	76.0%
484059502002	Block Group 2, Census Tract 9502, San Augustine County, Texas	81.9%
484059502003	Block Group 3, Census Tract 9502, San Augustine County, Texas	51.9%
484059503001	Block Group 1, Census Tract 9503, San Augustine County, Texas	30.3%
484059503002	Block Group 2, Census Tract 9503, San Augustine County, Texas	53.6%
484072001011	Block Group 1, Census Tract 2001.01, San Jacinto County, Texas	51.0%
484072001012	Block Group 2, Census Tract 2001.01, San Jacinto County, Texas	44.6%
484072001013	Block Group 3, Census Tract 2001.01, San Jacinto County, Texas	62.5%
484072001021	Block Group 1, Census Tract 2001.02, San Jacinto County, Texas	39.3%
484072001022	Block Group 2, Census Tract 2001.02, San Jacinto County, Texas	22.8%
484072001023	Block Group 3, Census Tract 2001.02, San Jacinto County, Texas	49.1%
484072001024	Block Group 4, Census Tract 2001.02, San Jacinto County, Texas	19.1%
484072001025	Block Group 5, Census Tract 2001.02, San Jacinto County, Texas	57.9%
484072002001	Block Group 1, Census Tract 2002, San Jacinto County, Texas	32.3%
484072002002	Block Group 2, Census Tract 2002, San Jacinto County, Texas	52.8%
484072002003	Block Group 3, Census Tract 2002, San Jacinto County, Texas	58.3%
484072003001	Block Group 1, Census Tract 2003, San Jacinto County, Texas	40.9%
484072003002	Block Group 2, Census Tract 2003, San Jacinto County, Texas	52.0%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
484090102023	Block Group 3, Census Tract 102.02, San Patricio County, Texas	29.5%
484090103011	Block Group 1, Census Tract 103.01, San Patricio County, Texas	30.7%
484090103012	Block Group 2, Census Tract 103.01, San Patricio County, Texas	26.2%
484090103013	Block Group 3, Census Tract 103.01, San Patricio County, Texas	26.3%
484090103021	Block Group 1, Census Tract 103.02, San Patricio County, Texas	23.6%
484090103022	Block Group 2, Census Tract 103.02, San Patricio County, Texas	16.6%
484090103023	Block Group 3, Census Tract 103.02, San Patricio County, Texas	60.0%
484090105001	Block Group 1, Census Tract 105, San Patricio County, Texas	52.4%
484090105002	Block Group 2, Census Tract 105, San Patricio County, Texas	56.6%
484090106011	Block Group 1, Census Tract 106.01, San Patricio County, Texas	41.9%
484090106012	Block Group 2, Census Tract 106.01, San Patricio County, Texas	26.7%
484090106013	Block Group 3, Census Tract 106.01, San Patricio County, Texas	10.3%
484090106014	Block Group 4, Census Tract 106.01, San Patricio County, Texas	19.3%
484090106021	Block Group 1, Census Tract 106.02, San Patricio County, Texas	20.1%
484090106022	Block Group 2, Census Tract 106.02, San Patricio County, Texas	34.1%
484090106031	Block Group 1, Census Tract 106.03, San Patricio County, Texas	13.6%
484090106041	Block Group 1, Census Tract 106.04, San Patricio County, Texas	25.3%
484090106042	Block Group 2, Census Tract 106.04, San Patricio County, Texas	16.1%
484090107001	Block Group 1, Census Tract 107, San Patricio County, Texas	18.8%
484090107002	Block Group 2, Census Tract 107, San Patricio County, Texas	14.9%
484090108001	Block Group 1, Census Tract 108, San Patricio County, Texas	41.9%
484090108002	Block Group 2, Census Tract 108, San Patricio County, Texas	18.0%
484090108003	Block Group 3, Census Tract 108, San Patricio County, Texas	44.8%
484090108004	Block Group 4, Census Tract 108, San Patricio County, Texas	47.8%
484090109001	Block Group 1, Census Tract 109, San Patricio County, Texas	32.3%
484090109002	Block Group 2, Census Tract 109, San Patricio County, Texas	22.9%
484090109003	Block Group 3, Census Tract 109, San Patricio County, Texas	36.2%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
484090111002	Block Group 2, Census Tract 111, San Patricio County, Texas	29.0%
484090111003	Block Group 3, Census Tract 111, San Patricio County, Texas	40.6%
484090112001	Block Group 1, Census Tract 112, San Patricio County, Texas	19.4%
484090112002	Block Group 2, Census Tract 112, San Patricio County, Texas	48.4%
484090112003	Block Group 3, Census Tract 112, San Patricio County, Texas	34.2%
484090113001	Block Group 1, Census Tract 113, San Patricio County, Texas	63.3%
484090113002	Block Group 2, Census Tract 113, San Patricio County, Texas	58.9%
484090113003	Block Group 3, Census Tract 113, San Patricio County, Texas	61.6%
484579501001	Block Group 1, Census Tract 9501, Tyler County, Texas	57.3%
484579501002	Block Group 2, Census Tract 9501, Tyler County, Texas	45.5%
484579501003	Block Group 3, Census Tract 9501, Tyler County, Texas	43.1%
484579502001	Block Group 1, Census Tract 9502, Tyler County, Texas	58.6%
484579502002	Block Group 2, Census Tract 9502, Tyler County, Texas	44.9%
484579502003	Block Group 3, Census Tract 9502, Tyler County, Texas	63.1%
484579502004	Block Group 4, Census Tract 9502, Tyler County, Texas	26.3%
484579502005	Block Group 5, Census Tract 9502, Tyler County, Texas	25.7%
484579503001	Block Group 1, Census Tract 9503, Tyler County, Texas	36.5%
484579503002	Block Group 2, Census Tract 9503, Tyler County, Texas	70.7%
484579504001	Block Group 1, Census Tract 9504, Tyler County, Texas	52.1%
484579504002	Block Group 2, Census Tract 9504, Tyler County, Texas	44.1%
484579504003	Block Group 3, Census Tract 9504, Tyler County, Texas	44.8%
484579504004	Block Group 4, Census Tract 9504, Tyler County, Texas	33.7%
484579505001	Block Group 1, Census Tract 9505, Tyler County, Texas	34.8%
484579505002	Block Group 2, Census Tract 9505, Tyler County, Texas	51.6%
484690001001	Block Group 1, Census Tract 1, Victoria County, Texas	42.0%
484690001002	Block Group 2, Census Tract 1, Victoria County, Texas	42.8%
484690002011	Block Group 1, Census Tract 2.01, Victoria County, Texas	66.0%
484690002012	Block Group 2, Census Tract 2.01, Victoria County, Texas	79.3%
484690002013	Block Group 3, Census Tract 2.01, Victoria County, Texas	50.5%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
484690003011	Block Group 1, Census Tract 3.01, Victoria County, Texas	74.1%
484690003012	Block Group 2, Census Tract 3.01, Victoria County, Texas	93.2%
484690003021	Block Group 1, Census Tract 3.02, Victoria County, Texas	77.6%
484690003022	Block Group 2, Census Tract 3.02, Victoria County, Texas	52.0%
484690004001	Block Group 1, Census Tract 4, Victoria County, Texas	53.1%
484690004002	Block Group 2, Census Tract 4, Victoria County, Texas	6.2%
484690005011	Block Group 1, Census Tract 5.01, Victoria County, Texas	41.9%
484690005012	Block Group 2, Census Tract 5.01, Victoria County, Texas	66.1%
484690005013	Block Group 3, Census Tract 5.01, Victoria County, Texas	44.7%
484690005021	Block Group 1, Census Tract 5.02, Victoria County, Texas	77.1%
484690005022	Block Group 2, Census Tract 5.02, Victoria County, Texas	46.1%
484690005023	Block Group 3, Census Tract 5.02, Victoria County, Texas	12.1%
484690006011	Block Group 1, Census Tract 6.01, Victoria County, Texas	57.3%
484690006012	Block Group 2, Census Tract 6.01, Victoria County, Texas	38.9%
484690006013	Block Group 3, Census Tract 6.01, Victoria County, Texas	55.8%
484690006021	Block Group 1, Census Tract 6.02, Victoria County, Texas	62.9%
484690006022	Block Group 2, Census Tract 6.02, Victoria County, Texas	38.0%
484690006023	Block Group 3, Census Tract 6.02, Victoria County, Texas	23.3%
484690006024	Block Group 4, Census Tract 6.02, Victoria County, Texas	79.5%
484690007001	Block Group 1, Census Tract 7, Victoria County, Texas	53.2%
484690007002	Block Group 2, Census Tract 7, Victoria County, Texas	46.7%
484690007003	Block Group 3, Census Tract 7, Victoria County, Texas	35.0%
484690008001	Block Group 1, Census Tract 8, Victoria County, Texas	23.7%
484690008002	Block Group 2, Census Tract 8, Victoria County, Texas	33.1%
484690013001	Block Group 1, Census Tract 13, Victoria County, Texas	36.4%
484690013002	Block Group 2, Census Tract 13, Victoria County, Texas	45.1%
484690014001	Block Group 1, Census Tract 14, Victoria County, Texas	29.1%
484690014002	Block Group 2, Census Tract 14, Victoria County, Texas	28.4%
484690014003	Block Group 3, Census Tract 14, Victoria County, Texas	28.1%
484690014004	Block Group 4, Census Tract 14, Victoria County, Texas	15.4%
484690015011	Block Group 1, Census Tract 15.01, Victoria County, Texas	22.5%
484690015012	Block Group 2, Census Tract 15.01, Victoria County, Texas	12.0%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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%
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%

		Percent of Block Group Low or Moderate
FIPS Code	Block Group	Income
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: <u>United States Department of Housing and Urban Development, Low and Moderate Income</u> <u>Summary Data</u>, 2017.

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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. During the official public comment period, the web form will also direct anybody who indicates they wish to receive housing assistance to the Help For Texans website so they can get assistance immediately. This form will be available in both English and Spanish.

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 youthers 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	else would. *Tack 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. *Tack 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. *Eack of training and education – There is a significant lack of understanding amongst landlords and property owners about what disability start sand ends with plausial 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. These things could be alleviated by requiring lan		Yes
	The AI is 994 pages long. This, in an 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 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. 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

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

"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.

² The 2019 TDHCA AI incorrectly states:

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.

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.

³ The Fair Housing Act states:

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 Inventory⁴ 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%.

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

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 wellbeing 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-

Indicator: Proportion of tract area within 1-mi buffer of Toxic Release Inventory (TRI) sites.

Rationale:

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. 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). 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

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.

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,

(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.

¹⁴ This QAP provision states:

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	45.4	0.4.700	22.447
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%

City of Dallas 2023 HTC Inventory analysis of allocations from 2016 to present

City of Dallas 2016 to 2023	LIHTC		Total Units in	Total "LIHTC" Units in LIHTC
LIHTC allocations	projects		LIHTC projects	projects
All in City with census tract ID in TDHCA HTC Inventory with allocations approved from 2016 to October	, ,			p. J. S.
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%

City of Houston 2023 HTC Inventory

City of Houston	LIHTC projects	Total Units in IHTC 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%

City of Houston 2023 HTC Inventory analysis of allocations from 2016 to present

	1		1
City of Houston 2016 to 2023 LIHTC allocations All in City with census tract ID in TDHCA HTC Inventory with	LIHTC projects	Total Units in LIHTC projects	Total "LIHTC" Units in LIHTC projects
allocations approved from 2016 to October	455	22.254	24.740
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	15		
Percent of All in tracts with greater than or equal to 50% White not	15	1,312	1,115
Hispanic or Latino	9.7%	5.6%	5.1%

City of San Antonio 2023 HTC Inventory

City of San Antonio All in City w/	LIHTC projects	Total Units in LIHTC projects	Total "LIHTC" Units in LIHTC projects
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%

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%

City of Austin 2023 HTC Inventory

			Total "LIHTC"
			Units in
	LIHTC	Total Units in	LIHTC
City of Austin	projects	LIHTC projects	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	450	26.256	25 576
Hispanic or Latino Percent of All in	150	26,256	25,576
tracts with less			
than 50% White			
Not Hispanic or			
Latino	82.0%	86.3%	86.3%
Lucino	02.070	00.370	00.370
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	40.00/	42.70/	42.70/
Hispanic or Latino	18.0%	13.7%	13.7%

City of Austin 2023 HTC Inventory 2016 to current

		ı
LIHTC projects	Total Units in LIHTC projects	Total "LIHTC" Units in LIHTC projects
118	19,259	18,801
97	16,735	16,329
82.2%		
21	2,524	2,472
47.004		13.1%
	97 82.2%	projects LIHTC projects 118 19,259 97 16,735 82.2% 86.9%

City of Fort Worth 2023 HTC Inventory

			Total "LIHTC"
		_	Units in
	LIHTC	Total Units in	LIHTC
City of Fort Worth	projects	LIHTC projects	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	70.40/	70.00/	70 50/
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
×p=5 5. 2516		2,. 33	5,557
Percent of All in			
tracts with			
greater than or			
equal to 50%			
White Not			
Hispanic or Latino	21.9%	21.1%	20.5%

City of Fort Worth 2023 HTC Inventory 2016 to current

			Total "LIHTC"
City of Fort Worth			Units in
2016 to 2023	LIHTC	Total Units i	n LIHTC
LIHTC allocations	projects	LIHTC project	s projects
Total	60	9,13	9,138
All in City with census tract ID in TDHCA HTC Inventory with			
allocations approved from 2016 to October 30, 2023	57	9,0	58 8,341
Total in tracts with less than 50% White not Hispanic or Latino	44	6,9	15 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	14	2.1	1 000
Hispanic or Latino	14	2,14	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%

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

			Allocation Rate
	Percent of		for Majority
	Applications	Percent of	White Areas as
	for Units in	Applications for	Percent of
	Majority White	Units in Minority	allocation rate
	Areas, LiHTC	Areas, LIHTC	for Minority
Year	allocated	allocated	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%

	EJI Factor:	FII F 4					
within 1-mi buffer of EPA National Priority List	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	mi buffer of EPA	EJI Factor: Percentile rank ofproportion of tract'sarea within 1- mi buffer of EPA risk management plan site
Units in TD	HCA LIHTC pro	jects affected	by the CDC/A	TSDR EJI indust	rial related elem	ent	
# of LIHTC units in tracts containing area within 1	tracts with expsosure to NPL	# 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. **
6171 351 5820 94.3%	6171 351 5820 94.3%	39595 1499 38096 96.2%	514 22743	0 5852	0 5852	839 25605	465 20662
1792 0 1792 100.0%	1792 0 1792 100.0%	24788	94 8547	0 4842	0 4842	358 14510	358 11539
0 0 0	0	1696 22250	325 9424	0	0	1082 15306	1012 12667
2748 0 2748	2748 0 2748	20983 1194 19789	11558 952 10606	2796 0 2796	2796 0 2796	14735 417 14318	12009 107 11902
r	# of LIHTC units in TD # of LIHTC units in tracts containing area within 1 mi buffer of NPL site 6171 351 5820 94.3% 1792 0 1792 100.0% 0 0 2748 0	Priority List (NPL) sites Units in TDHCA LIHTC pro # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of .75. ** 6171 6171 351 351 351 351 351 351 351 351 351 35	National Priority List (NPL) sites Wational Priority List site Units in TDHCA LIHTC projects affected # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of NPL site 6171 6171 6171 39595 351 351 1499 5820 5820 1820 1820 1820 194.3% 96.2% 6172 1792 1792 25091 0 0 0 303 1792 1792 25091 0 0 0 1696 0 0 0 22250 0 0 0 92.9%	National Priority List (NPL) sites Wiffer of EPA National Priority List site Units in TDHCA LIHTC projects affected by the CDC/A # of LIHTC units in tracts with expsosure to NPL sites that is greater than the national percentile rank of NPL site 6171 6171 39595 23257 351 351 351 1499 514 5820 5820 38096 22743 94.3% 94.3% 96.2% 97.8% 1792 1792 25091 8641 0 0 0 303 94 1792 1792 24788 8547 100.0% 100.0% 98.8% 98.9% 0 0 0 22946 9749 0 0 0 22250 9424 0 0 0 92.9% 96.7% 2748 2748 20983 11558 0 0 0 1194 952 2748 2748 20983 11558 0 0 1194 952 2748 2748 20983 11558 0 0 1194 952 2748 2748 20983 11558	National Priority List (NPL) sites Welfer of EPA National Priority List site Welfer of EPA Toxic Release Inventory site Welfer of Cort. Welfer of EPA Toxic	National Priority List National Priority List (NPL) sites White Sites Release Inventory (TRI) Storage, and Disposal Facilities (TSDF) White Sites White Sites White Sites White Sites White CDC/ATSDR EJI industrial related elem Who dunits in LIHTC units in tracts with racts with racts with national greater than the national mib buffer of PNPL site White Sites that is Storage, and Disposal Facilities (TSDF) White Sites In Tract with in tracts with national percentile rank of NPL sites White Sites that is Storage, and Disposal Facilities (TSDF) White Sites In Tract with in LIHTC projects in tract containing area exposure to NPL within 1-mi buffer of sites for the national percentile rank of .75. ** White Sites that is sites that is sites with national percentile rank of .75. ** White Sites in Tract with in 1-mi buffer of .75. ** White Sites that is sites that is sites with national percentile rank of .75. ** White Sites in Tract with in 1-mi buffer of sites for the national percentile rank of .75. ** White Sites in Tract with in 1-mi buffer of sites for the sites was sites in the national percentile rank of .75. ** White Sites in Tract with in Treatment, Storage, and Disposal site White Sites in Tract containing area exposure to NPL within 1-mi buffer of sites for the Disposal of national percentile rank of .75. ** White Sites is that is Sites that is Sites that is Sites that is Sites with in 1-mi buffer of .75. ** White Sites is that is Sites that is Sites that is Sites with in 1-mi buffer of sites for the Disposal of national percentile rank of .75. ** White Sites is that is Disposal for national percentile rank of .75. ** White Sites is that is Sites that is	National Priority List National Priority List Storage National Priority List Storage National Priority List Storage National Priority List Storage National Priority List site National Priority List H of Lilifornius in Lilifornius in Lilifornius in Lilifornius in tracts with tracts with units in Lilifornius

Exhibit 3 page 1

	CDC/ATSDI	R EJI Index indu	strial related	factor*				
	tract area	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	tract area within 1 mi buffer of EPA	EJI Factor: Percentile rank ofproportion of -tract'sarea within 1 mi buffer of EPA risi management plan site
	Units in TD	HCA LIHTC proj	jects affected	l by the CDC/A	TSDR EJI indust	rial related elem	ent	
	# of LIHTC units in tracts containing area within 1 mi buffer of NPL site	•	in tract containing area within 1-mi buffer of Toxic Release	# 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 Agency for Toxic Subs https://www.atsdr.cd	tances and Disecc.gov/placeandh	ase Registry (ATSDF nealth/eji/index.htn	R). This data is ava nl.	ailable at				
** The higher the per					· · · · · · · · · · · · · · · · · · ·			
A percentile ranking r								
For example, a EJI ran								
than the tract of inter	est,and that 15%	% or tracts in the na	Lion likely experie	ence more severe (Lumulative impacts i	rom environmental b	uruen.	
available at:								
*** The number of ur	its in this eyhihi	t 3 is varies somew	hat from the unit	s in Eyhihit 1 Thic	Exhibit was prepare	d using the		
TDHCA 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 records¹

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 Al 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 Als 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 Al 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 Al, 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

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 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.

https://nationalequityatlas.org/indicators/Housing_burden?geo=02000000000048000

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.



The 2024 Al should adopt these Four Rights as guiding principles and use them as a standard to measure impediments and actions against. An Al 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 Al 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 Al 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 Al public comment process. Will all public comment in the 2024 Al 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 Al? 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



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.

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 Al 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 County¹² 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.

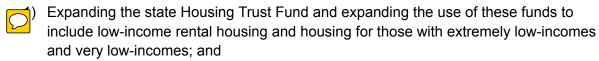
Other steps that TDHCA and the State can take to expand voucher access in high opportunity, exclusionary areas include:

- 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:



Expanding the State Housing Tax Credit.

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

https://www.novoco.com/notes-from-novogradac/dispelling-oft-repeated-misconception-analysis-shows-lih tc-financed-properties-are-not-concentrating

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.

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 gap incentive location lihtc properties 05061 5.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.

To 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-evi dence-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" 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. Formerly incarcerated people are more than 10 times more likely to be unhoused than the general public. 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.

https://services.austintexas.gov/edims/document.cfm?id=379792

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-Al-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.

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