



CITY OF PLANO NORTH TEXAS REGIONAL HOUSING ASSESSMENT



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SECTION I

EXECUTIVE SUMMARY

I. Executive Summary

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

This report documents the process and findings of the Assessment of Fair Housing (AFH) for the City of Plano in the following sections:

- **Community participation** – NTRHA gathered information from the general public, stakeholders and subject matter experts through public meetings (3), focus groups (9), consultations (38) and surveys (234). Focus groups and public meetings included approximately 260 attendees from throughout the community.
- **Assessment of past goals and accomplishments** – The City of Plano has made progress toward affirmatively furthering fair housing by supporting the development of affordable housing, redeveloping aging and substandard housing, increasing access to transportation and working through community partners to provide supportive services.
- **Fair housing analysis** – Census data, stakeholder and expert knowledge, and national, state and local information sources were studied to create an informed picture of Plano fair housing conditions. Racial and ethnic segregation, concentrations of poverty and housing problems for persons with disabilities, limited English proficiency, and families with children, seniors and other protected classes were studied to identify fair housing issues and barriers to access to opportunity.
- **Fair housing goals and priorities** – City and PHA leaders worked together to identify priorities for action among fair housing issues and set long-range goals that addressed these issues.

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

- **Segregation** – Segregation has increased since 1990 in the City of Plano but remained in the low range for all racial and ethnic groups except Hispanic residents, for whom segregation has increased to the moderate level. Compared with the region, the City continues to have significantly more white and fewer black and Hispanic residents than the region. Asian residents far exceed the regional proportion, but they tend to live in higher income communities in the City.
- **Concentration of poverty** – Significant numbers of very-low-income residents continue to be concentrated in east Plano with less access to quality schools, public amenities and strong retail and commercial services.
- **Location of publicly supported housing** – The majority of publicly supported housing continues to be concentrated in east Plano and along the I-75 corridor.
- **Housing cost** – Home prices, apartment rents and property taxes continue to rise rapidly and exceed the capacity of many Plano residents and workers to afford housing.
- **Access to employment** – Service and support workers cannot find affordable housing in proximity to their places of employment, creating problems for employers who struggle to attract and retain workers, increasing traffic. The lack of affordable transit options exacerbates this problem.

Seven additional issues were also identified by participants in public engagement activities:

- **Lack of affordable housing** – Rising housing costs and limited access to subsidies and assistance make it increasingly difficult for support and service workers, low-income families and persons living on fixed incomes, including seniors and persons with disabilities to find housing.
- **Discrimination** – Most landlords will not accept renters paying with housing subsidies. Minorities continue to feel they are directed to living in areas of higher poverty and segregation. Community opposition to the spread of affordable housing throughout the City continues.
- **Lack of affordable transportation** – Affordable transportation options are not adequate to support participation in work, commercial and civic life, and recreation.
- **Lack of integrated, supported, affordable housing for persons with disabilities** – Most persons with disabilities find housing completely unaffordable, especially when compared with limited and fixed incomes.
- **Fair housing education and enforcement by private providers** – Brokers, home builders, landlords and other private housing providers take advantage of persons with limited knowledge of fair housing laws.
- **Investment in and revitalization of neighborhoods** – Older, lower income neighborhoods need more investment to improve and increase public infrastructure, retail services and recreational opportunities.

The City and PHA set the following goals to address these issues:

- Increase access to affordable housing in high-opportunity areas (defined by the City as areas with an area median income (AMI) greater than 80% or a poverty rate of 10% or less)
- Increase supply of affordable housing units
- Increase supply of accessible, affordable housing for persons with disabilities
- Increase access to affordable transportation options for low-income households and persons with disabilities
- Make investments in targeted neighborhoods to increase opportunity
- Increase access to information and resources on fair and affordable housing
- Maintain and improve the quality and management of publicly supported housing



SECTION II

COMMUNITY PARTICIPATION PROCESS

II. Community Participation Process

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

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

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

Figure 1: Public participation goals, strategies and targets

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

All public participation efforts throughout this project, particularly public meetings and focus groups, were conducted by independent facilitators who were members of the research team rather than individuals associated with the City of Plano or the Plano Housing Authority. This ensured that all community members would feel comfortable sharing firsthand experience and knowledge and could criticize agencies openly, if desired. NTRHA is confident that an accurate account of housing realities is captured in this report.

Web Presence

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

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

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

- Deafnetwork.com – Housing focus groups for people with ALL Disabilities (Deaf network.com, 2017)
- University of Texas at Arlington – Aim of assessment study to foster collaboration (Booth, 2017)
- ICP – Getting your fair housing concerns heard – VFO Webinar (ICP: inclusive communities project, 2017)
- National Apartment Association – DFW continues regional assessment (NAA: National Apartment Association, 2018)
- Community for Permanent Supported Housing – NTR Fair Housing Assessment Meetings (Community for Permanent Supported Housing, 2018)
- CPSH – Across DFW: Assessment of Fair Housing (CPSH, 2017)

Public Meetings

Two public meetings were sponsored by the City of Plano and the Plano Housing Authority. An additional meeting was conducted during a public meeting of the Plano Community Relations Commission.

- July 27, 2017, Plano Housing Authority, Community Room, 7 to 9 p.m.
- Feb. 5, 2018, Plano Housing Authority, Community Room, 7 to 9 p.m.
- Feb. 15, 2018, City of Plano, Community Relations Commission, 5:30 p.m.

The first public meeting was designed to present HUD data and get community input on contributing factors to barriers to fair housing. The meeting consisted of a short presentation

followed by the opportunity for attendees to interact with posters, including HUD data in easy to understand maps. Attendees were asked to vote for the factors contributing the most to fair housing problems. Attendees were also given the opportunity to attach notes to posters with their comments, share their views with staff and make an audio recording of their comments. The meeting ended with a large group discussion to invite any additional public comments. The meeting was facilitated by NTRHA staff with City and housing authority staff available to address questions. Refreshments were provided. The events were conducted on the premises of the Plano Housing Authority, centrally located in the City of Plano, an accessible public facility. (Presentation slides and posters are attached in the Appendix.) Forty-eight attendees completed a sign-in sheet and 34 attendees completed the NTRHA survey.

The second public meeting was similar in format with a brief presentation and the opportunity to interact with posters, including HUD data maps. The goal of the second meeting was to get public feedback on draft jurisdiction goals and candidate strategies. Attendees were asked to vote on the level of importance of each suggested goal.

Public meetings were advertised using the following strategies:

- Published by the Plano Housing Authority and City of Plano in the Plano Star Courier
- Posting on www.northtexasrha.com
- Flyers prepared and distributed in English and Spanish to LIHTC properties, nonprofit organizations providing social services, libraries, advocacy/civil rights organizations (e.g., LULAC, NAACP, Inclusive Communities Project)
- Emails with flyers to distribution lists of the Collin County Homeless Coalition, Collin County Social Services Association and City of Plano nonprofit service providers
- Emails to current or former participants in the City of Plano Housing Rehabilitation and First Time Homebuyer programs
- Distribution of information at neighborhood association meetings coordinated by City of Plano BEST Neighborhoods Division and neighborhood round table events
- Posting on Nextdoor.com

Focus Groups

Nine focus groups were conducted on behalf of the City of Plano and the Plano Housing Authority. Each focus group was sponsored by an organization or targeted toward a group of stakeholders sharing common interests in fair housing.

- June 19, 2017, 5:30 PM, Alpha Kappa Alpha Sorority, Chi Zeta Omega Chapter, Collin County (African American women's service organization), 12 attendees
- June 27, 2017, 5:30 PM, Collin County, Southern Christian Leadership Conference of Collin County, 13 attendees
- Aug. 17, 2017, 10:00 AM, the Plano Housing Authority, invited developers of and advocates for affordable housing, 6 attendees
- Aug. 17, 2017, 2:00 PM, City of Plano, invited representatives of nonprofit service providers, 15 attendees, including:
 - Collin County Homeless Coalition
 - Plano ISD McKinney-Vento Coordinator
 - Assistance League of Greater Collin County
 - Isabel's Community Outreach (education, Hispanic community)
 - Texas Muslim Women's Foundation (domestic violence assistance)
 - North Texas Aging and Disability Resource Center

- Jewish Family Service
- Habitat for Humanity
- Collin College
- The Turning Point (serving survivors of sexual violence)
- My Possibilities (continuing education for persons with cognitive disabilities)
- Assistance Center of Collin County (serving persons experiencing financial crisis)
- Inclusive Communities Project (housing advocacy, mobility counseling)
- City House (emergency shelter, transitional housing for children, young adults)
- Aug. 21, 2017, 2:00 PM, Plano Community Homes Pioneer Place, publicly supported housing consumers, senior independent living, 12 attendees
- Aug. 23, 2017, 7:00 PM, City of Plano, homeowners, lower income and high-opportunity areas, 9 attendees
- Oct. 23, 2017, 12:30 PM, Inclusive Communities Project, Walker Voucher recipients (publicly supported housing mobility counseling clients), 2 attendees
- Nov. 2, 2017, 5:30 PM, Community for Permanent Supportive Housing, persons with disabilities, Dallas and Collin counties, 16 attendees
- Nov. 9, 2017, 1:30 PM, Plano Community Homes, LEP residents of senior publicly supported housing with Chinese translation, 5 attendees

Focus groups were advertised through the following strategies:

- Posted at www.northtexasrha.com
- Posted flyers at senior housing facilities in English and Chinese
- Emails to the Plano Housing Authority client lists
- Emails to City of Plano nonprofit service provider network
- Publicizing through City of Plano neighborhood association network
- Emails to developer partners of the Plano Housing Association and City of Plano

Consultations

Consultations (interviews, meetings, tours) were conducted with key informants and subject matter experts. Subject matter experts were identified with the help of the City of Plano, the Plano Housing Authority and research by NTRHA staff. A complete list of all the organizations with which researchers consulted is included under Section 2 below.

City of Plano and PHA staff:

- Economic Development: Peter Braster, Director of Special Projects, and Kendra Cobbs, Senior Planner, Special Projects
- Environmental Health: Jim Dingman, Manager
- Planning: Doug MacDonald, Comprehensive Planning Manager; Christina Day, Planning Director
- Accessibility: Anthony Han, ADA Coordinator
- Economic Development: Cindy Powell, Business Retention Specialist
- Housing and Neighborhood Services: Shanette Eaden, Housing and Community Services Manager; Natalie Evans, Grants Analyst; meetings and tour of Plano housing programs
- Plano Housing Authority: Dave Young, Finance Director; meetings and tour of publicly supported housing properties, including LIHTC, HCVs, multifamily and single-family

Regional/State Resources:

- Center for Public Policy Priorities, Dick Lavine, Senior Fiscal Policy Analyst; Dr. Frances

Deviney, Director of Research

- State Rep. Eric Johnson, housing legislative strategies
- Dallas Women's Foundation, Dena Jackson, Director of Programs and Research
- Texas Civil Right Project, Wallis Nader, attorney
- NTRHA Technical Advisory Board
- University of Kansas, Dr. Kirk McClure, AFH researcher
- Gateway Planning, Brad Lonberger, Principal Planner
- Community for Permanent Supportive Housing, Robin LeoGrande, President

NTRHA also established a technical advisory board that met twice during the project. The first meeting was June 28, 2017 to present the project study plan and get input from the board on important issues to address throughout the study. The second meeting was June 8, 2018 to discuss the draft goals and strategies developed by each jurisdiction and get feedback. Figure 3 in Section 2 below lists the organizations and their representatives participating in the technical advisory board. The technical advisory board includes representatives of advocacy organizations for protected groups and related industries. Technical advisory board members also attended other NTRHA public engagement events and participated in individual consultations.

Surveys

Two hundred thirty-four surveys were received from residents of Plano zip codes and from attendees at Plano public engagement events. Surveys were collected on paper at all public events as well as online. A plurality of surveys (69) were completed by residents of east Plano (zip code 75074), indicating good participation from lower income and minority sectors (Figure 2). Nearly half of all surveys were received from residents of zip codes immediately to the west of US 75. Twenty-two surveys were received from 12 zip codes outside the City of Plano but in the jurisdiction of the Plano Housing Authority.

Zip Code	Location	#	%
75074	East of US 75	69	29%
75023	West of US 75	43	18%
75075	West of US 75	43	18%
75093	Far West	24	10%
75025	West of US 75	21	9%
75024	Far West	12	5%
Other	12 zip codes	22	9%

Figure 2: Residence of survey respondents by zip code, number and percent received

Summary

Plano outreach strategies were particularly successful in reaching residents of lower income areas with higher concentrations of racial and ethnic minorities (e.g., zip codes 75074 and 75075). Focus groups were very effective in engaging members of protected classes and their advocates or service providers, including persons with disabilities, racial and ethnic minorities, seniors and LEP residents.

2

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

Date	Organization	Attendees	Event/Topic
6/19/2017	Alpha Kappa Alpha Sorority, Chi Zeta Omega Chapter, Collin County	Members	Organization-sponsored membership event, focus group conducted by NTRHA
3/24/2017	Building Community (BC) Workshop	Brent Brown, founder; Owen Wilson-Chavez, staff; Lizzie MacWillie, Director	Discuss AFH process and research on affordable housing strategies
6/9/2017	Center for Public Policy Priorities	Steven Murdock, Rice University, former Texas State Demographer and head of 2010 US Census; Simran Noor, Vice President, Center for Social Inclusion	Board meeting/presentation addressing changing demographics and strategies to discuss social inclusion, racial inequities
2/21/2017	Center for Public Policy Priorities	Frances Deviney, Director of Research	Discuss research on women, economic opportunity and housing
9/21/2017	Center for Public Policy Priorities	Dick Lavine, Senior Researcher	Discuss policy to address rising property taxes and housing affordability
4/7/2018	City of Plano	Public, invited speakers	City of Plano Fair Housing Symposium, collected input from public on fair housing issues
2/15/2017	City of Plano, Community Relations Commission	Members, public	Present results and draft goals for feedback from commission
3/8/2018	City Square	Dr. John Slburt, President; other Staff	Tour of Opportunity Center and tiny home development, discussion of affordable housing programs and challenges
6/27/2017	Collin County Southern Christian Leadership Conference	Rev. Dr. Charles Reese, President; members	Regular membership meeting; presentation and focus group by NTRHA; presentation by Jason Hernandez on second-chance initiatives
8/23/2017	Community for Permanent Supportive Housing	Robin LeoGrande, President	Gather information on challenges in housing access by persons with disabilities
5/3/2018	Communities in Schools, Dallas Region	Amy Wyatt, Elementary Programs; Dr. Judith Allen, CEO	Discuss at-risk students and programs to mitigate risk
3/30/2017	Criterion Development Partners	Pretlow Riddick, President	Discuss barriers to construction of affordable housing
3/6/2017	Dallas Women's Foundation	Dena Jackson, Director, Programs and Research	Discuss AFH process and housing issues related to gender
2/9/2017	Dallas Women's Foundation	Roslyn Dawson Thompson, President & CEO	Discuss release of Women's Economic Issues Report
8/3/2017	Disability Rights Texas	Rachel Cohen-Miller, Attorney; Christopher McGreal, Attorney	Discuss state and municipal policies relating to fair housing for persons with disabilities
10/9/2017	Gateway Planning	Brad Lonberger, principal	Discuss planning issues relating to affordable housing

Date	Organization	Attendees	Event/Topic
6/1/2017	Guardianship Services	Lyn Scott, Executive Director	Discuss programs available to support very low-income persons with disabilities in housing
4/27/2017	Hap Baggett Properties	Hap Baggett	Discuss issues of affordable housing development and neighborhood revitalization
2/9/2018	HousingWorks Austin/Federal Reserve Bank of Dallas	Mayor, County Commissioner, researchers, advocates	Housing + Economic Opportunity Summit (conference)
7/14/2017	HUD	Beth Van Duyne, Regional Administrator	Discuss barriers to affordable housing and strategies for permanent supported housing
3/23/2017	Inclusive Communities Project	Demetria McCain, President; Elizabeth Julian, Founder and Senior Counsel; Michael Daniel, attorney; other staff	Discuss AFH process and barriers to housing
5/15/2017	Kilpatrick Insurance	Kim Kilpatrick-Terrell, CEO and landlord	Discuss impact of insurance costs on housing and experience as landlord with publicly assisted housing
10/24/2017	MHMR Tarrant County	Susan Garnett, CEO; Elaine Klos, board chair; Luke Reynard, chief of disability	Discuss housing challenges facing persons with disabilities and resources available
7/16/2017	National Association of Housing and Redevelopment Officials	Subject matter experts from industry and academia, public housing authority executives	Annual Summer Conference focusing on best practices in managing affordable housing
2/28/2018	National Low-income Housing Information Service	Adam Pirtle, Northwest Texas Director	Discuss AFH data, process, goals
11/9/2017	Plano Community Homes	Lee Ann Hubanks, CEO; Residents and Service Coordinator	NTRHA focus group and interviews, low-income senior housing development
5/19/2017	Texas Civil Rights Project	Wallis Nader, attorney	Discuss impact of probation fees on housing affordability
10/30/2017	Texas Legislature	State Rep. Eric Johnson and staff	Discuss recent legislative strategies to address affordable housing
8/2/2017	University of Kansas	Dr. Kirk McClure, researcher, Mid-America Regional Council/AFH	Discuss strategies for analyzing voucher use and regional management of HCVs
3/22/2017	University of North Texas Health Science Center	Dr. Emily Spence-Almaguer, Associate Dean for Community Health and Health Equity	Discuss issues connecting persons emerging from chronic homelessness with medical services in permanent supportive housing

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

Figure 3: NTRHA Technical Advisory Board member organizations and representatives

3

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

Effectiveness of Outreach Activities

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

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

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

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

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

NTRHA received comments and questions regarding the public participation process and notification strategy throughout the public participation process. NTRHA prioritized outreach strategies to maximize reach and widen the possibility of diverse input, within its constraints.

NTRHA made every effort to include all populations, neighborhoods and other groups during the process; none were intentionally excluded. NTRHA continuously addressed gaps by adjusting outreach strategy. Additional steps to improve or increase community participation in the future could improve overall participation and participation among specific protected class groups.

NTRHA experimented with scheduling focus groups directly in the community while the public meetings were underway, but without success. NTRHA found that it was much more effective to recruit through its client organizations, partner with other community organizations or leverage existing meetings where a housing focus group could be added to the agenda. This approach also allowed the research team to engage with stakeholders not typically considered in housing analysis. For example, the focus group conducted with Alpha Kappa Alpha Sorority, Chi Zeta Omega Chapter, Collin County (an African American women's service organization), involved many participants who were not directly involved in housing issues but had meaningful insight to share on firsthand experiences with the contributing factors to barriers to fair housing. The focus group conducted in partnership with the Community for Permanent Supported Housing involved

many participants who might not normally be comfortable participating in a discussion group that was not designed with their needs in mind.

Additionally, the NTRHA research team was responsive to the needs of the community by creating and distributing a survey that allowed individuals who could not attend public meetings or focus groups to contribute meaningful insight. The City of Plano, the Plano Housing Authority (PHA) and community organizations were encouraged to distribute this survey both electronically and in print format. In Plano and the jurisdiction of PHA, 234 surveys were collected and the resulting comments were incorporated in this report.

Strategies to Improve Community Participation

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

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

Addressing the needs of the LEP population beyond Spanish-speaking individuals could have benefitted from additional efforts. Plano has a substantial number of LEP Chinese speakers, and a significant number attended an early focus group where a translator (who had been requested) was not present. When NTRHA scheduled a follow-up focus group and arranged for translation services, only three Chinese speakers attended. Those who did attend, did not need translation services. Focus group flyers translated into Chinese encouraged the LEP Chinese-speaking population to attend, but translation services for both Spanish and Chinese were also needed. Scheduling a follow-up focus group did not fully recoup the missed opportunity for input at the first meeting.

The second round of public meetings was not as well attended as the first, although the meetings were publicized through the same traditional media outlets, social media, printed flyers and community organizations. NTRHA also communicated with individuals who expressed interest in updates on the research by using email addresses obtained from focus group/public meeting sign-in sheets, surveys and any written comments to recruit for second round meetings. Low attendance could be attributed to the fact that the first round of public meetings was in the summer and the second round was in the winter. The North Texas region experienced unprecedented rain and near-freezing temperatures in February 2018, making it difficult for some individuals to leave home and travel to a public meeting. Another reason could be that all interested parties felt that they had already given sufficient input. In the future, this could be remedied by more accurately explaining the difference in the public meetings.

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

4

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

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

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

A brief survey consisting of five questions was distributed at public events, in public locations and online; 234 surveys were received from the residents of Plano and the jurisdiction of PHA. Qualitative data was collected through public meetings, demand-side focus groups, supply-side focus groups and consultations. Notes were taken at each public event and consultation by UTA researchers and loaded into qualitative analysis software for coding and summarization (Sociocultural Research Consultants, LLC, 2018). All data was analyzed and sorted into the seven issue areas and associated contributing factors provided by the AFH tool. Comments were sorted based first on their context, i.e. the question or material provided by the researcher, and second, by the contributing factor to which they related. These results directly informed the contributing factors to barriers to fair housing.¹ Comments from NTRHA public engagement activities are used throughout this report to illustrate findings, especially in reporting contributing factors to fair housing issues.

The following is a general summary of comments received. Comments are organized into contributing factors to barriers to fair housing (Phase I Public Participation). The NTRHA survey results were analyzed separately and are also summarized in this section.

Contributing factors to Segregation

- Community opposition to rental housing and minority residents
 - There is historic racial prejudice
 - Prejudice/racism; traditions – people continue to follow old habits
 - Intergenerational prejudice
 - Implicit as well as overt prejudice contributes to community opposition

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

- There are challenges associated with living as a member of a racial minority in a predominantly white community
 - Difficulty fighting against stereotypes and being the first one or the odd one out in a new neighborhood
 - The need for minorities to band together for safety from persecution
- Walker Voucher holders moving into low-income minority communities are stigmatized in their new communities and schools
 - Minority children face stigma; teachers would make them [minority students] feel oppressed even though they [all students] live in the area and go to the same school
- There is a lack of social and personal supports in high-opportunity areas
- There is opposition on the part of landlords to accepting Housing Choice Vouchers
- Home owner associations set caps on the number of rental units permitted within their boundaries that keep out lower income minorities; HOAs have increased with recent development
- Proximity to support systems
- People tend to want to live in communities with access to their preferred places of worship
 - People didn't want to move away from their support system.
- People tend to want to live in communities near people who speak their language
- People prefer living closer to affordable public transit or churches for help with food and other issues during times of need (noted by service providers)
 - With limited income and little or no transportation, you tend to gravitate toward people you know for a support base
- Effects of income
- Low minimum wage rates/service worker wages restrict housing choice
- There is a lack of affordable housing in areas with low levels of segregation

Contributing factors of Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

- R/ECAPs are largely driven by the location and type of affordable housing
- Lack of options
 - Low-income housing options are available in limited affordable price ranges
 - Affordable options are often poor quality and in undesirable areas
 - When taking low-income housing seekers to places, they did not want to stay there (due to undesirable property or neighborhood conditions) but there were no options
 - Vouchers create segregation. Available affordable housing stock is geographically concentrated. Voucher holders have extremely limited choices where to live.
- Voucher holders experience significant pressure to find a unit within the time frames required.²
 - The time limit to use a voucher puts pressure on housing seekers to find a house because they do not want to lose the voucher, so to utilize it they might move to an area where they might not want to live

² The PHA allows 60 days for a Housing Choice Voucher applicant to find an apartment and submit a proposed lease. The applicant may request (in writing) one or more 30-day extensions to this time period, the first of which will be automatically granted. Additional extensions may be granted based on extenuating circumstances at the PHA's discretion, none of which include factors relating to the availability of housing in particular locations or prices (Plano Housing Authority, 2015).

- Discrimination experienced by protected classes
 - Discrimination based on race, gender (female) (noted by service providers)
 - Landlords wouldn't rent to blacks or females in high-opportunity areas.
 - Familial composition (single mothers with children) (noted by service providers)
 - Single moms having hard times.
 - Source-of-income discrimination (noted by service providers)/voucher holders considered to be poor rental risk based on income
 - We are seeing increasing stigma of low-income and voucher. There is high demand in this area and there is not enough supply. And landlords can choose not to take vouchers.
- Landlord negative association with voucher holders
 - Voucher holders considered to be poor rental risk based on prior experiences (w/voucher holders)
 - If a landlord had a bad experience with a voucher holder, he might not consider the risk worth the cost.
 - Landlords associate voucher holders with criminal behavior
 - It's the refusal of developers and landlord voucher acceptance, if they have a voucher they are considered low income/criminals. It is that stigma about the public assisted housing that might be a contributing factor.
- Decline in the quality of private investments (east Plano)
 - Physical property deterioration
 - Loss of quality retailers
 - Increase in unwanted uses such as bars
 - What is happening now in our area, you only really saw in certain areas of Dallas. We lost chain grocery stores, but now it's like little Mexico. Not everyone has the same value for how they treat the City. East Plano is basically becoming rundown Dallas. We are seeing east Plano deteriorate. Retail is down scaling, more trash. It started with the inclusion of the bar.

Contributing factors to Disparities in Access to Opportunity

- Education
 - Location of proficient schools is important
 - One of the primary reasons to choose to move out of historically segregated neighborhoods is in order to have access to higher performing schools
 - School assignment policies
 - Many families move into Plano in order to meet residency requirements and get access to high-quality Plano schools
- Employment
 - Location of employers
 - Jobs not located near housing affordable to employees
 - Lack of affordable transportation connecting jobs with affordable housing
 - More affordable housing is needed that could meet the needs of low- and moderate-income households (young families, workforce wage earners, police, firefighters, nurses, teachers, waiters and retail workers)
 - Greater access to job centers motivate moving out of high-poverty communities and into communities like Plano
 - Job growth includes many lower income jobs while housing growth has been in higher cost housing products

- Transportation
 - Availability, type, frequency and reliability of public transportation
 - Low-income participants are dependent on owning their own car in order to get to work and meet other needs
 - Retail and other services such as grocery stores are not located within comfortable walking distance from housing
 - Access to rail service is welcome and motivated people to live near a rail station
 - Access to public transit is limited within subdivisions, creating problems with first- and last-mile transportation to major bus and rail routes
- Land use and zoning laws
 - Variety in housing types that meet different needs is lacking, including one-story homes, tiny homes, universal design, homeless housing

Contributing factors to Disproportionate Housing Needs

- High housing costs, loss of affordable housing, displacement of residents
 - Economic development is increasing housing cost and increasing supply of housing not affordable to low- and moderate-income residents
 - Affordable housing available is not up to HUD standards
 - Persons living on a fixed income have a particularly hard time acquiring and maintaining housing – both rising housing prices and property valuations (property taxes) cause problems
 - Families are forced to share housing or live in housing that is too small for their family composition
 - No emergency shelter in Plano for persons who are homeless
 - Cost to rehab and maintain older homes makes them unaffordable
- Lack of public and private investments in older neighborhoods
 - Residents in older, lower income neighborhoods need more access to playgrounds, parks, walking trails, dog parks, public pools, libraries, civic centers, free activities
 - Older, lower income neighborhoods need repairs to streets, walkways, sewers, better lighting in parks and alleys, improved safety
 - Persons living in senior housing have limited access to grocery stores
- Lack of housing supports for victims of domestic violence – shelters are full

Contributing factors to barriers to Publicly Supported Housing

- Lack of opportunity for admissions and occupancy policies
 - People spend years on the waiting list and then cannot find landlords who will accept the vouchers
 - Process is difficult and confusing, especially for seniors who may not be comfortable with online applications
 - PHA issues vouchers based on a two-person-per-bedroom policy – no privacy for mothers with older children, teens
 - Persons who are “couch surfing” while homeless have difficulty documenting literal homelessness to qualify for homeless housing assistance
- Access to affordable housing information
 - People don't know where to get information and how to apply for help
 - People aren't educated in the requirements of home ownership
- Discrimination
 - Community opposition to new affordable housing units in higher opportunity areas

- Landlords refuse to accept vouchers
- Loss of affordable housing
 - LIHTC projects are reaching the age where they are being transitioned to market-rate units
- Language access
 - Laws need to be explained in the language of the person needing the information

Contributing factors to barriers for people with Disabilities

- Affordability
 - Persons with disabilities typically have income from SSI or SSDI of approximately \$730 per month – an affordable housing unit would be \$300 per month for rent and utilities – none available at this price point
 - People with disabilities are unable to own homes on their own due to lack of affordability – even a gifted home is too expensive in terms of property taxes and maintenance
 - Persons with disabilities typically cannot afford to live independently in the neighborhood in which they were born and raised (serious problem when they outlive their parents)
- Lack of affordable supportive services
 - Many people with disabilities need in-home supports to assure life safety and provide assistance with activities of daily living
 - Lack of affordable assisted living centers
- Lack of affordable housing units that are accessible for persons with disabilities
 - Demand far greater than supply, decreases affordability
- Lack of access to publicly supported housing
 - Few options available to use voucher program to increase housing for persons with disabilities
- Public transportation
 - Transit services very limited for persons living in senior housing
 - Paratransit services are difficult to use, require very long trips
 - Participants were unaware of available resources for assistance with transit
- Education
 - Need programs at the community college level that teach job skills
 - Need more supported employment opportunities

Contributing factors to barriers to Fair Housing Enforcement

- People don't know their rights as tenants, and landlords take advantage of this lack of knowledge
- People don't know how to get landlords to make repairs

Survey results

The following charts summarize the results of 234 surveys received from participants at Plano public meetings, focus groups and residents of Plano completing surveys online³.

Respondents ranked four types of housing needs from 1 to 5 with 1 indicating the most important and 5 the least important. Not all need types received a rank from every respondent. Figure 4 provides an account of the number respondents that ranked the different housing needs. The most frequent housing need ranked was Housing Affordability (228) followed by Housing Availability, Housing Quality, Special Accommodations and Other. Figure 5 displays the percent of rankings received by each housing need. Housing Affordability was ranked highest by 64% of those responding to that item. Housing Quality was ranked highest by 29% of the respondents compared to 22% for Housing Availability.

Housing needs	Responses
Housing Affordability (monthly cost)	228
Housing Availability (range of unit size)	208
Housing Quality	208
Special Accommodations (disability)	196
Other	81

Figure 4: Number of responses for each housing need

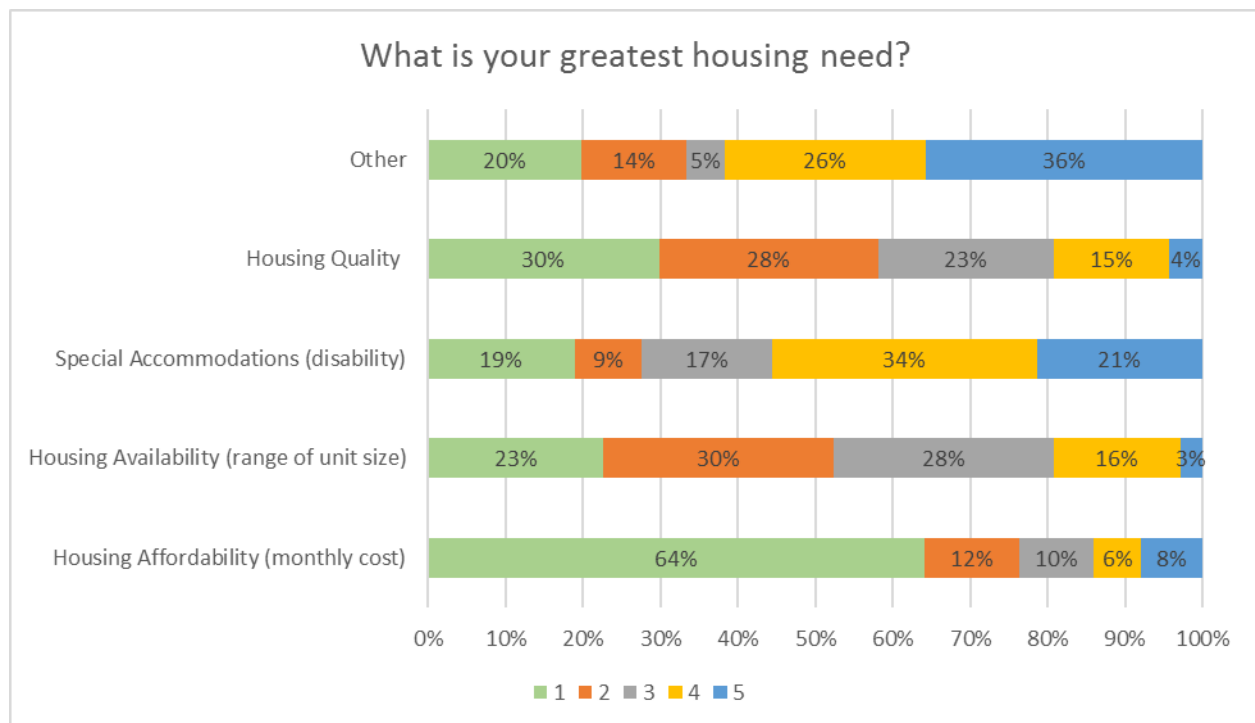


Figure 5: Responses by rank for greatest housing need, 1=most important, 5=least important

³ All responses are included in the appendix. Some questions are not reported here due to very low response rates.

Sixty-three write-in comments were made, including those explaining a response of “other.”

- Over half the comments received related to some aspect of location, including proximity to work (less than 30-minute commute), access to public transit (10 comments), proximity to good schools, including walking distance (8 comments) and access to services, including healthcare, groceries, libraries, shopping and leisure activities.
- Ten comments related to the safety and security of the neighborhood.
- Four comments related to neighborhood quality, appearance and quality of neighbors.
- Other individual comments stated needs for pets and service animals, maintenance, background checks, elderly affordable housing, emergency housing especially for women, fair landlords, large single-story housing types and energy efficiency.

Respondents were asked to rate their satisfaction with their current housing situation on a scale from 1 to 5 with 1 indicating that they were very satisfied and 5 indicating that they were not at all satisfied. Figure 6 displays the number and percent of responses for each level of satisfaction. Twenty-eight percent of respondents said they were very satisfied with their current housing situation while 49% rated their satisfaction 3 or below.

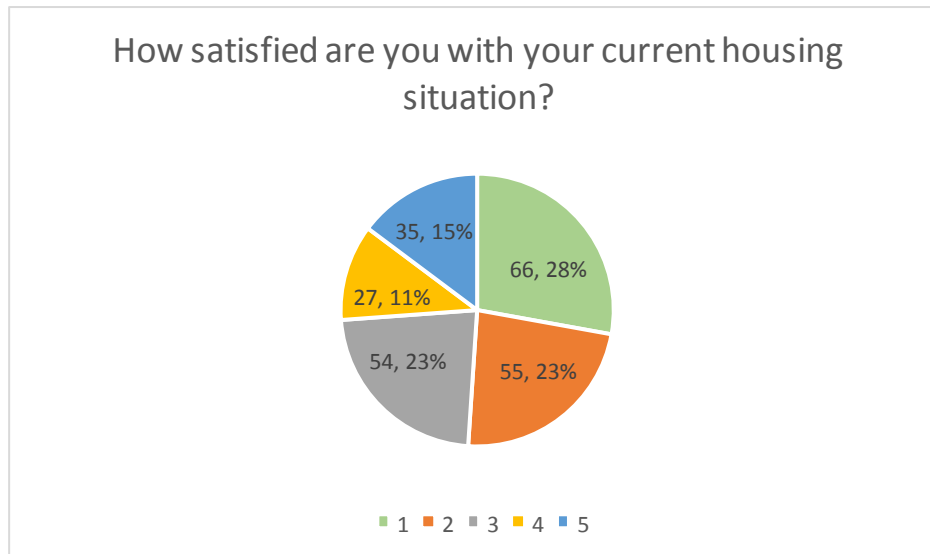


Figure 6: Number and percent of responses by housing satisfaction, 1=very satisfied, 5=not at all satisfied

Respondents ranked characteristics of public transportation from one, indicating most important, to six indicating least important. Respondents included transit users and non-users. Some respondents did not rank every transportation characteristic. Figure 7 displays total responses and the percent of those responses made by transit users. Affordability and Served areas were most frequently ranked. Hours of service was ranked next most frequently by users and non-users.

Transit features valued	Total Responses	Transit Users	
Affordability	184	117	64%
Served areas	184	97	53%
Hours of services	181	91	50%
Reliability	177	89	50%
Time to reach destinations	177	88	50%
Accessibility near house and work	67	38	57%

Figure 7: Number of responses per transportation feature and percentage reporting transit use

Figure 8 displays, for each transportation characteristic, the distribution of relative importance. Accessibility near house and work and Served areas were ranked important or most important by more than 57% of the respondents who ranked them.

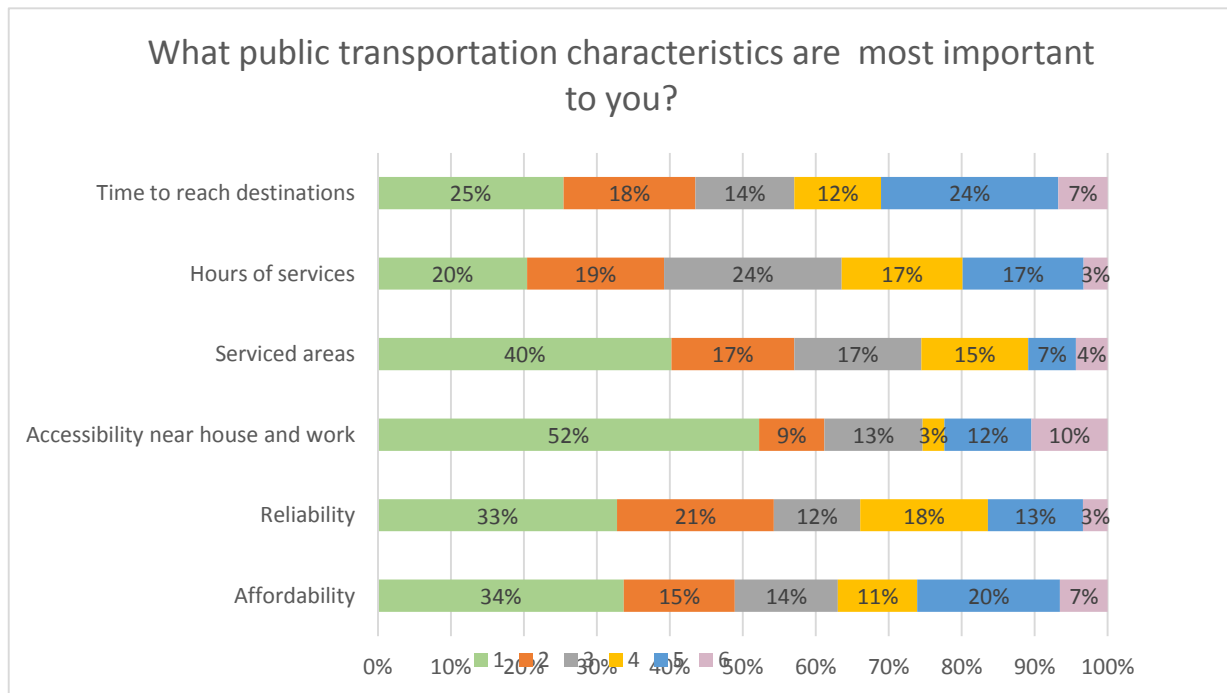


Figure 8: Percent of responses for important transportation characteristics, 1=most important, 6=least important

Respondents were asked to rate their satisfaction with current transportation options on a scale from one to five with one indicating very satisfied and five indicating not satisfied at all. Nineteen percent said they were very satisfied while 39% rated their satisfaction four or five, as displayed in Figure 9.

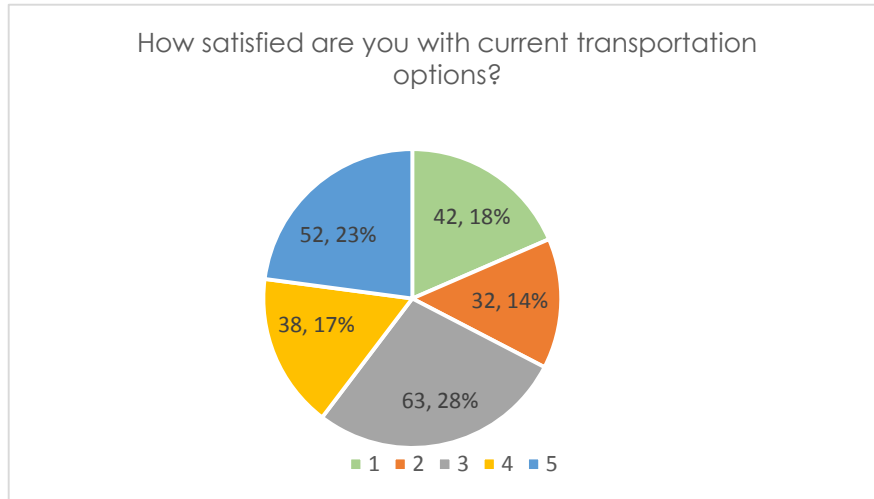


Figure 9: Percent of responses, rank of satisfaction with current transportation options, 1=very satisfied, 5=not at all satisfied

Respondents were asked to rank each of six selected characteristics of neighborhoods in order with 1 indicating the most important characteristic and 6 indicating least important. Figure 10 shows the total number of times each neighborhood characteristic was ranked. Access to employment opportunities and transportation options and affordability received the most responses (210 and 209, respectively), followed closely by access to quality education and low poverty neighborhood (207 and 202 responses, respectively).

Neighborhood Characteristic	Total responses
Access to employment opportunities	210
Transportation options and affordability	209
Access to quality education	207
Low poverty neighborhood	202
Healthy Neighborhood	143
Racially and economically integrated neighborhood	128
Safety	81
Racially integrated neighborhoods	80
Economically integrated neighborhoods	78
Other	65

Figure 10: Number of persons selecting each neighborhood characteristic

Figure 11 displays the proportion of each rank received by each characteristic. Safety received the greatest proportion of rankings of 1 (most important) and 2 (81%), and access to healthy neighborhoods received the next highest proportion of 1 and 2 rankings (57%). Sixty-five respondents selected the category for “other,” including the following write-in comments:

- Twenty-three of these respondents wrote that nearby neighborhood amenities were important to them, including access to grocery stores, libraries, recreation centers, jobs, restaurants, shopping, medical services, banks and parks, preferably within walking distance. Shopping and groceries were mentioned most often.
- Ten respondents said they valued safety, security, low crime rate and police interaction.
- Three respondents specified a priority for no lower income housing, including, “keep the poor out of Frisco”⁴, “no welfare” and “not near high-density apartments.” Other respondents said they valued “availability of all income levels,” “accessibility and affordability for people with disabilities” and “housing help – we have been homeless since discrimination.”
- Two respondents valued neighborhood maintenance and “more quality control on rent/lease homes.”
- Two respondents valued good schools and neighborhoods with children the same age as their own.

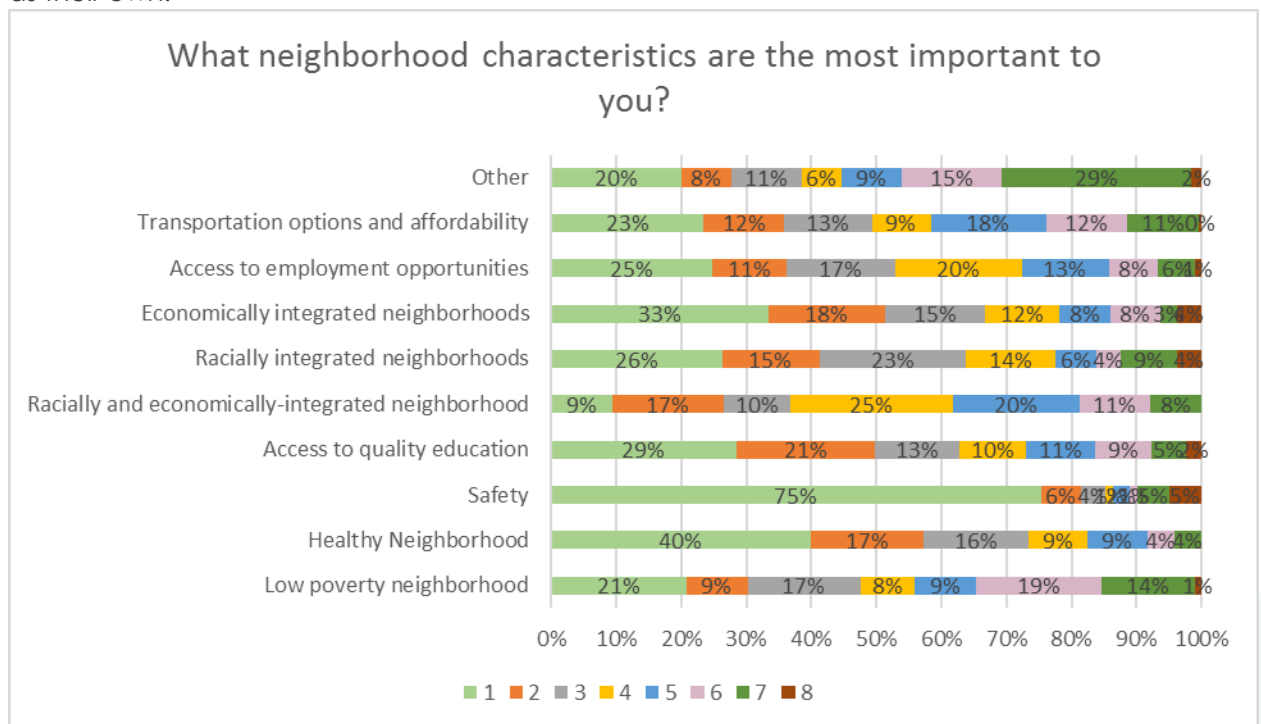


Figure 11: Percent of rankings for each neighborhood characteristic, 1=most important, 6=least important

⁴ The PHA jurisdiction extends in a 25 mile radius around the location of its offices in Plano. Frisco is within the jurisdiction of the PHA.

A small number of participants (37), at later meetings, were asked to answer questions about fair housing issues. Sixteen percent of these participants said that they had experienced fair housing discrimination (when presented with specific examples). Fourteen percent said that they had possibly experienced fair housing discrimination. Figure 12 displays the responses made by those who answered yes to whether they had experienced fair housing discrimination. Most of these respondents said that the basis for the discrimination they experienced was race, ethnicity, limited English proficiency, national origin or color. Fourteen percent said the discrimination was on the basis of disability, and 14% said the basis was level of income.

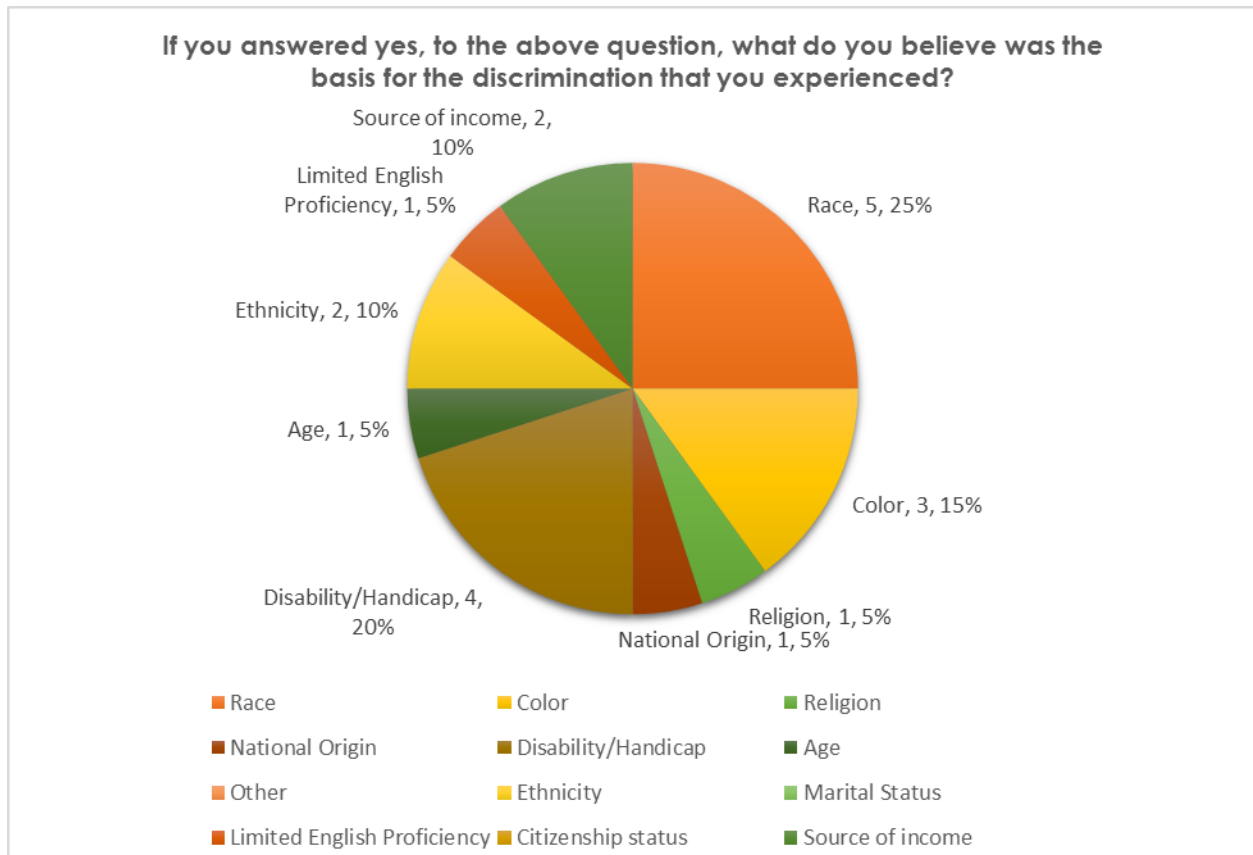


Figure 12: Basis for fair housing discrimination, if experienced

These participants were also asked to identify the most effective methods of informing residents about fair housing. Figure 13 shows the ratings of effectiveness for a selected list of methods with 1 indicating most effective and 5 indicating least effective. Fifty-seven percent rated public meetings as more effective (ranking of 1 or 2 on a five-point scale). Providing information at public libraries and municipal centers was equally rated. Participants who selected “other” recommended: outreach to homeless women, social media, water bill mailings, fairs and local gatherings, direct mail or email to those registered to vote, and communication through community case workers and apartment communities. One participant said that agency case workers were uninformed about fair housing issues.

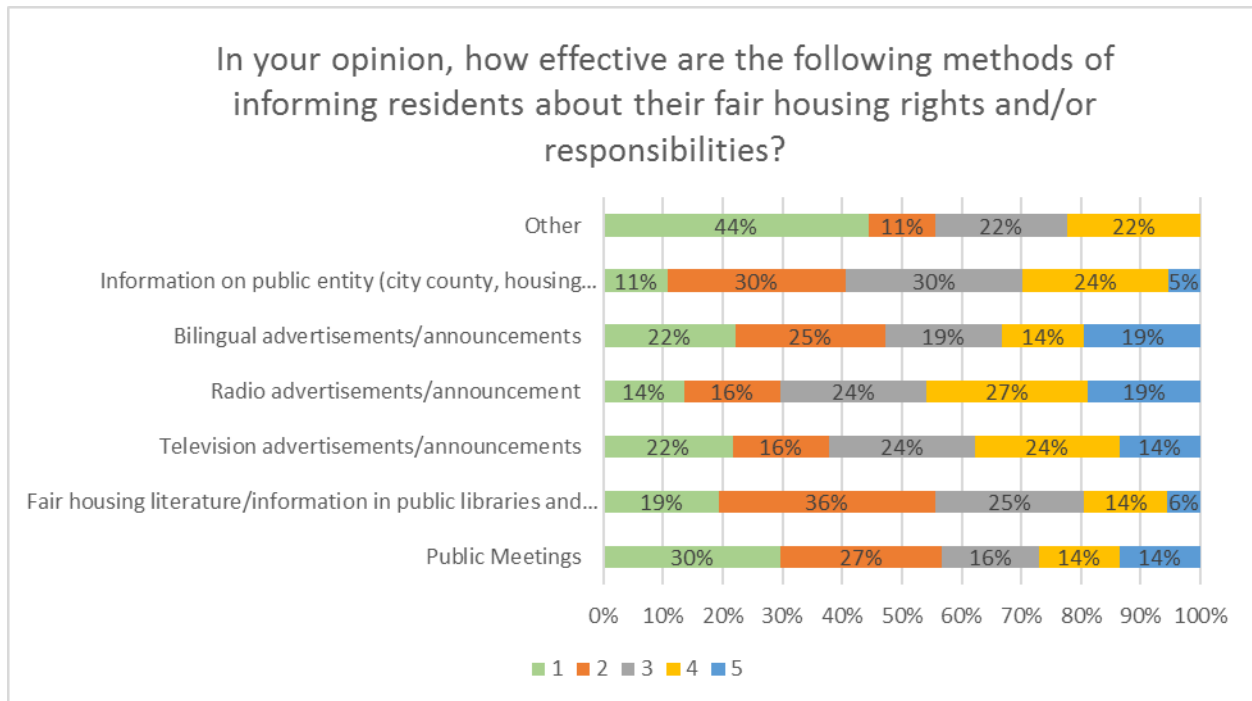


Figure 13: Rating of effectiveness for selected fair housing public information strategies, 1=most effective, 5=least effective

Demographic characteristics of survey respondents

The following charts describe the demographic characteristics of the respondents willing to complete demographic surveys at public meetings, focus groups and online. Respondents to the demographic survey had the following characteristics when compared to the community as a whole:

- More likely to be female (71%)
- Less likely to be Hispanic (15%)
- More likely to be black (31%)
- More likely to be single (38%)
- Much more likely to have a college degree (51%)
- Less likely to be employed (49%)
- More likely to have annual income of less than \$35k per year (55%)
- Slightly more likely to own their home (65%)

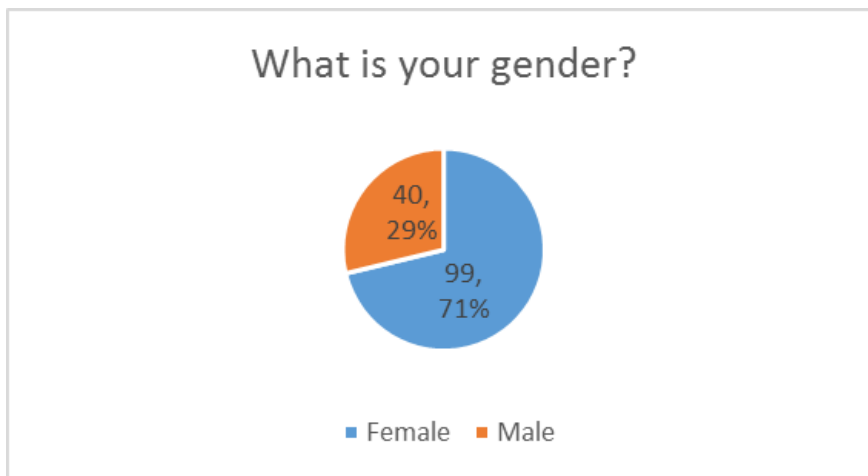


Figure 14: Percent of survey respondents by gender

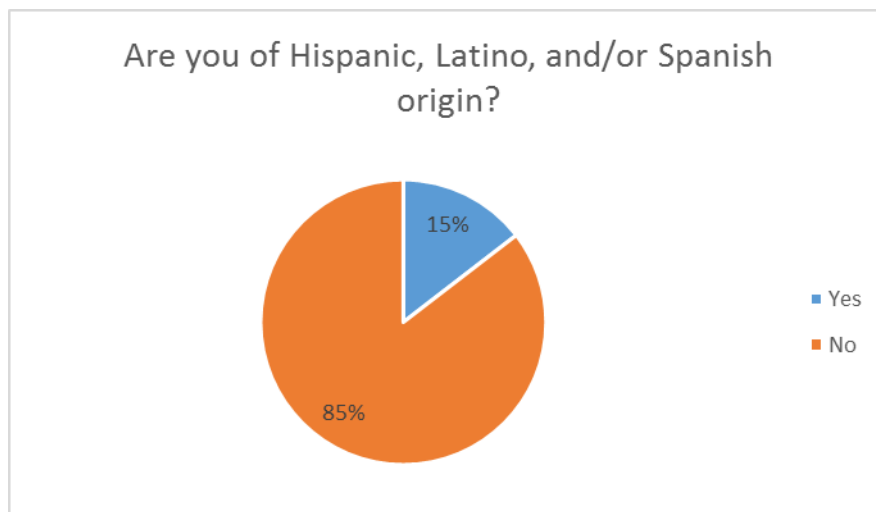


Figure 15: Percent of survey respondents Hispanic

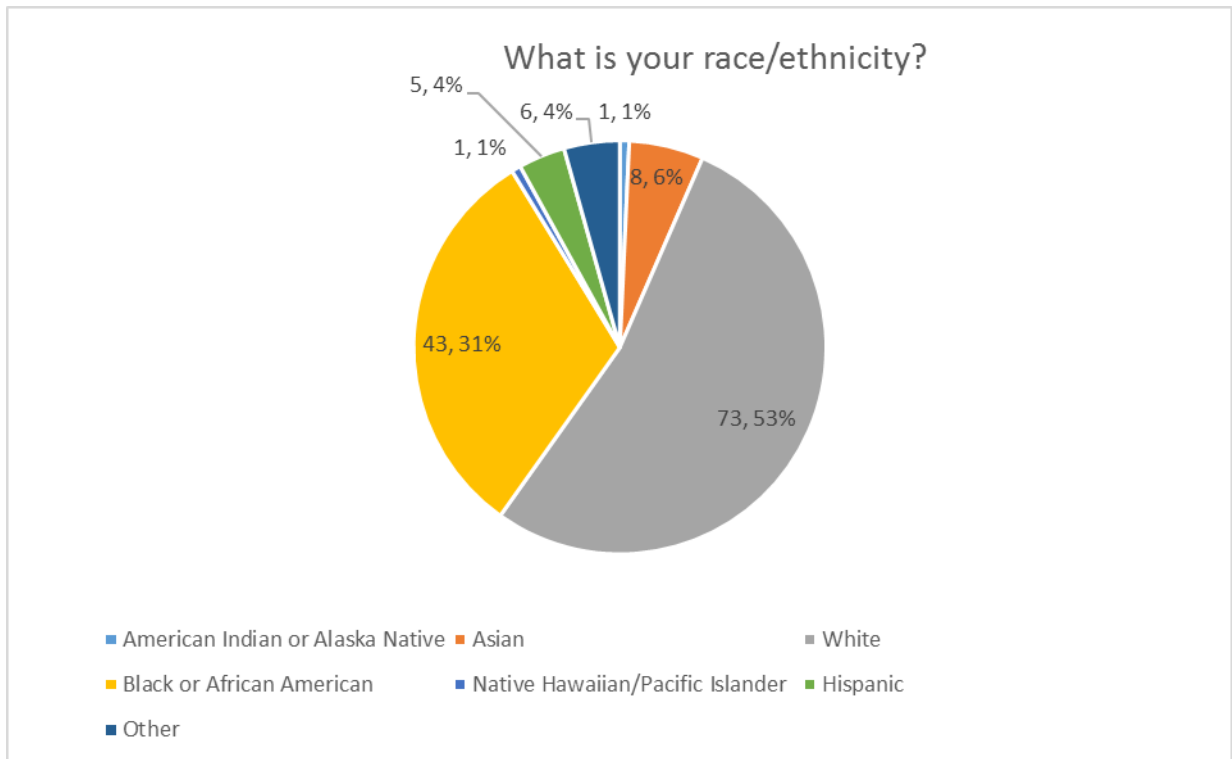


Figure 16: Demographic composition of survey respondents by race and ethnicity

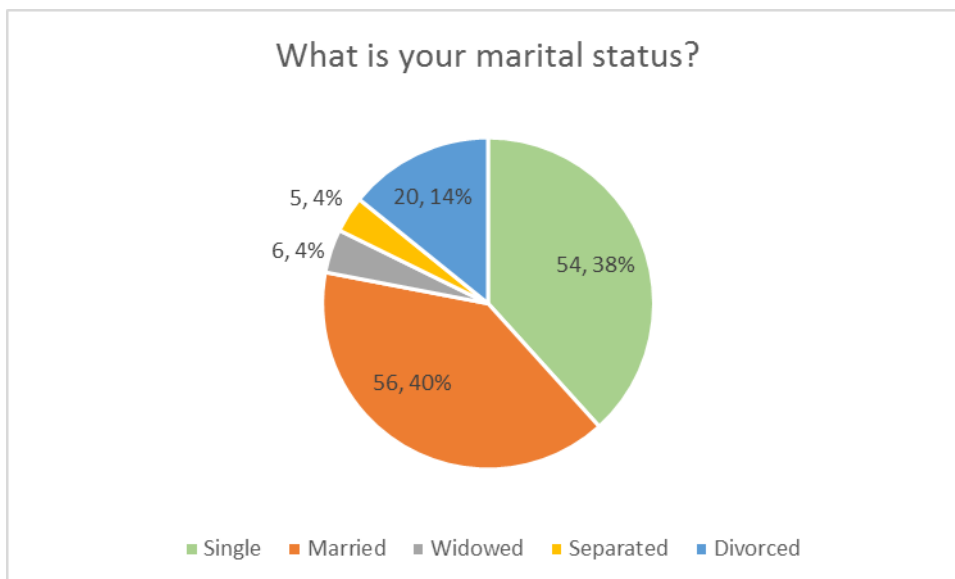


Figure 17: Percent of survey respondents by marital status

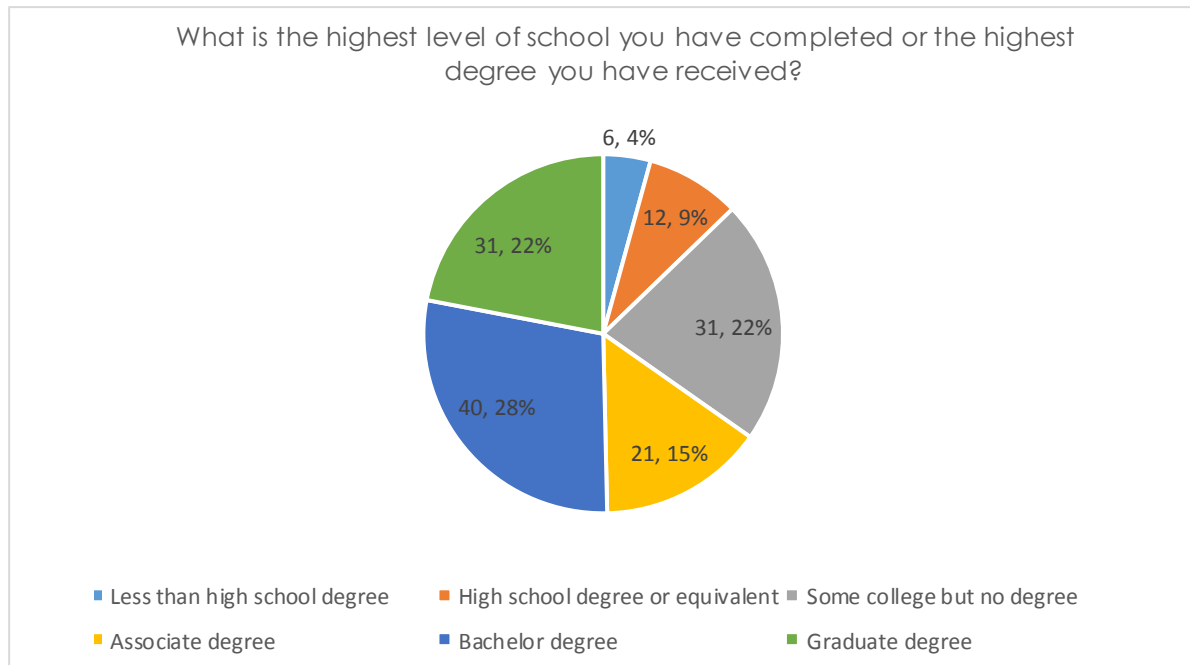


Figure 18: Demographic composition of survey respondents by highest level of education

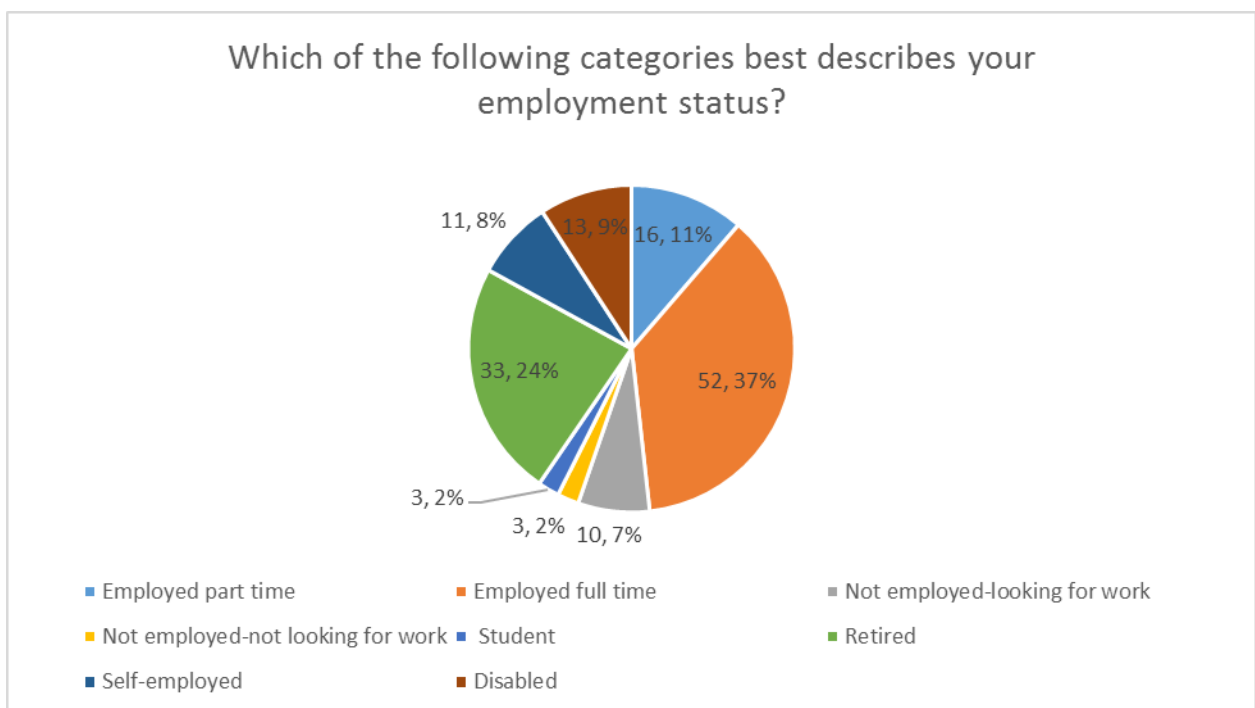


Figure 19: Employment status of survey respondents

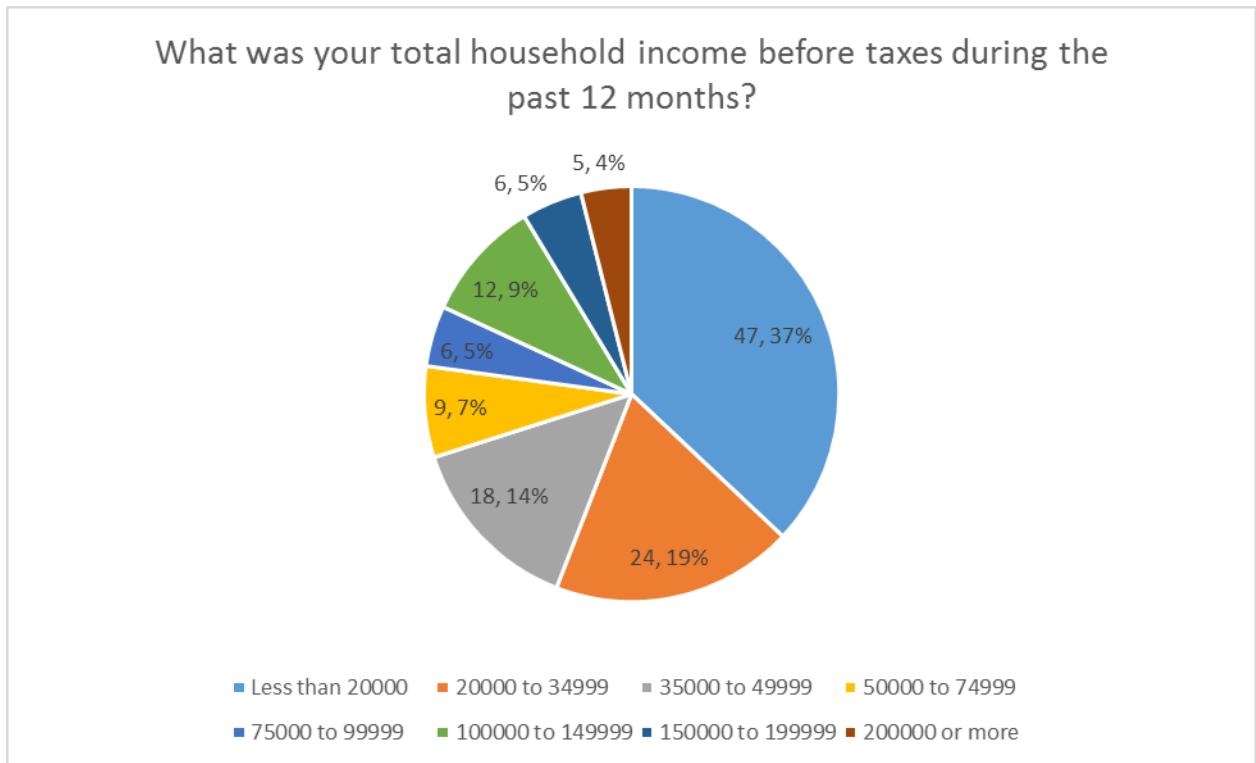


Figure 20: Total gross household income of survey respondents

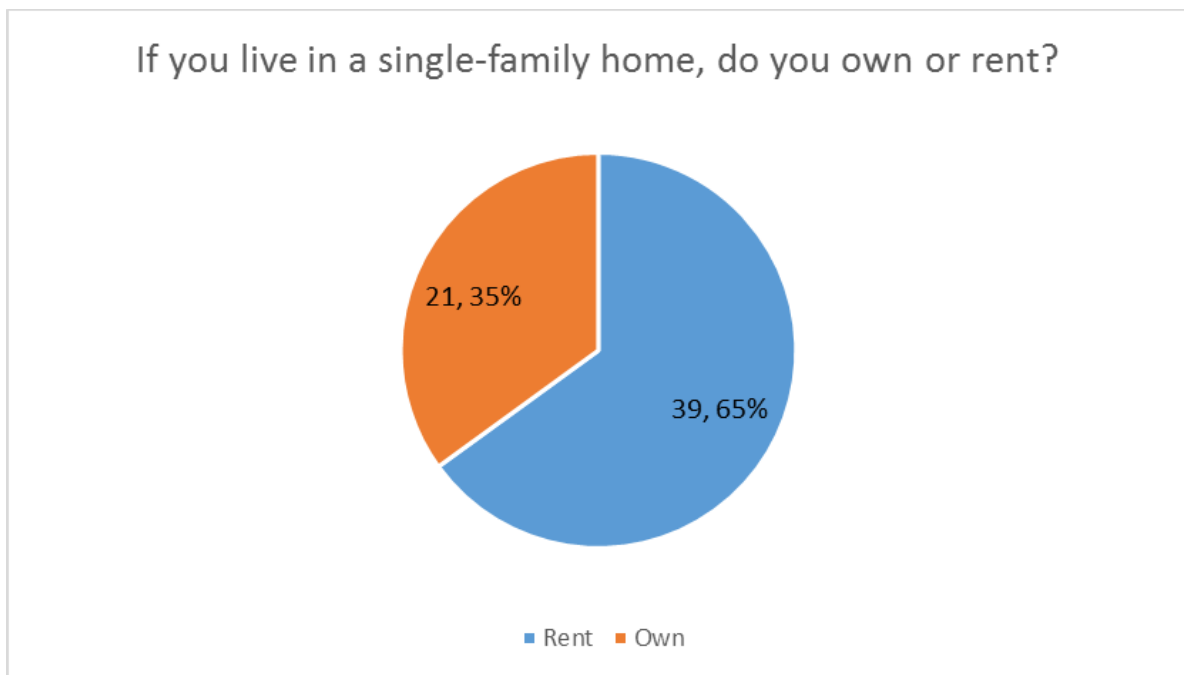


Figure 21: Percent of survey respondents by housing tenure

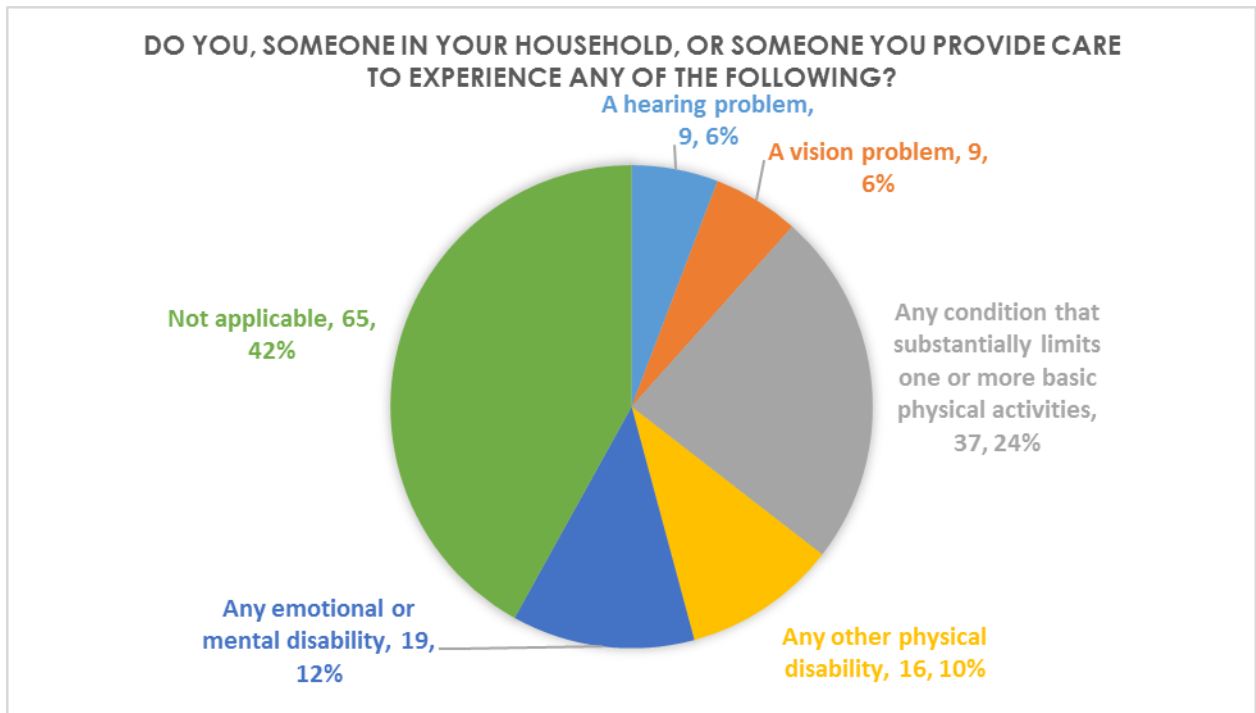


Figure 22: Survey respondents with disabilities or caring for someone with disabilities, by type



SECTION III

ASSESSMENT OF PAST GOALS AND ACTIONS

III. Assessment of Past Goals and Actions

1

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

The City of Plano published an Analysis of Impediments to Fair Housing Choice in 2015. The following remedial actions are included in the report in response to each impediment identified (J-Quad Planning Group, LLC, 2015).

Impediment: Housing affordability and insufficient income

Remedial Actions: The City of Plano will support and expand opportunities for affordable housing and rental subsidies by:

- Increasing production of affordable housing through public-private partnerships with developers and capacity building for nonprofits;
- Facilitating access to below-market-rate units particularly through providing resolution of no objection and/or support for developers applying to the State of Texas' Low Income Housing Tax Credit Program;
- Maintaining a list of partner lenders providing affordable housing financing and subsidies;
- Identifying and seeking additional sources of funds for affordable housing as they become available; and
- Encouraging private sector support for affordable housing initiatives

Impediment: Public policy and fair housing infrastructure impediments

Remedial actions:

- The City of Plano will increase fair housing education and outreach as funding becomes available in an effort to raise awareness and increase the effectiveness of fair housing ordinances. The City will target fair housing education and outreach to the rapidly growing minority and other immigrant and lower income populations.
- The City of Plano will partner with local industry to conduct ongoing outreach and education regarding fair housing for the general public and focused toward protected class members, renters, home seekers, landlords and property managers. Outreach will include providing joint fair housing training sessions, public outreach and education events, utilization of the City website and other media outlets to provide fair housing information, and multilingual fair housing flyers and pamphlets available in a variety of public locations.
- Encourage Fair Housing Enforcement Agencies to target increase fair housing testing for multifamily properties. The City of Plano will encourage HUD to provide increased fair housing testing in local apartment complexes. The testing program looks for evidence of differential treatment among a sample of local apartment complexes.

Impediment: Expanded services areas and increased access to public transportation is needed to address mobility for transit dependent persons

Remedial action: Continued involvement with local transit agency board and policy making progress to obtain expanded routes and services for City residents with special needs and/or low income

Impediment: Banking, finance, insurance and other industry related impediments

Remedial actions:

- The City will apply for competitive and non-entitlement State and Federal funding and assistance from nonprofit intermediaries for foreclosure financial literacy programs as funds become available. Financial literacy should be emphasized as a means of preventing poor credit and understanding the importance of good credit.
- The City of Plano will encourage bank and traditional lenders to offer products addressing the needs of households currently utilizing predatory lenders. This may require traditional lenders and banks to establish "fresh start" programs for those with poor credit and previous non-compliant bank account practices.
- The City of Plano will also help raise awareness among the appraisal industry concerning limited comparability for affordable housing products. Industry representatives should be encouraged to perform comparability studies to identify comparable real estate properties that more realistically reflect the values of homes being built in low income areas and supporting infill housing development.

Impediment: Socio-economic impediments

Remedial actions:

- The City of Plano will provide language assistance to persons with limited English proficiency.
- The City of Plano will continue to implement an Affirmative Fair Housing Marketing Plan to create fair and open access to affordable housing.
- The City of Plano will continue to encourage recruitment of industry and job creation that provide living wages to persons currently unable to afford market rate housing.
- The City of Plano will support development that provides alternative housing choices for seniors such as Senior Housing/Tax Credit Financing and Cottage Housing for Elderly Homebuyers.

Impediment: Neighborhood Conditions Related Impediments

Remedial actions: The City of Plano currently provides assistance to property owners through its "Love Where You Live" (LWYL) and Great Update Rebate Programs. The City will continue its support and implementation of this centralized program of self-help and community and housing improvement initiatives including:

- Increase self-help initiatives such as "fix-up," "paint-up," or "clean-up" campaigns and "corporate repair projects". Neighborhood residents, religious institutions, community organizations, individuals, and corporations would be recruited to participate in the repair to homes occupied by elderly, disabled, and indigent homeowners through organized volunteer efforts involving their members and employees.
- Implement a Youth Build and Repair Program in conjunction with the local school district or the Plano Housing Authority. Youth Build is a U.S. Department of Housing and Urban Development (HUD) program that teaches young people how to build new homes and repair older ones. HUD offers competitive grants to cities and non-profit organizations to help high-risk youth, between the ages of 16 and 24, develop housing construction job skills and to complete their high school education.

- Organize a “Compliance Store” where home builders, building supply stores, merchants, and celebrities, such as radio and television personalities, are used to demonstrate simple, cost effective ways to make improvements to houses and donate building supplies for use in self-help projects.
- Increased emphasis on organizing “adopt-a-block” and “adopt-an-intersection” campaigns where neighborhood groups, residents, scout troops, and businesses adopt key vistas and intersections to maintain and implement beautification projects, such as flower and shrub plantings and maintenance.
- Increase the use of Community Gardens as interim uses on select vacant lots to provide an opportunity for neighborhood residents to work together to increase the attractiveness of the neighborhoods.

Consolidated Plan Goals

The City of Plano prepared a Consolidated Plan (City of Plano, 2015) for the U.S. Department of Housing and Urban Development for 2015-2019. The following goals were selected as a result of the consolidated planning process conducted in 2014. Goals marked in bold address issues identified in the Analysis of Impediments to Fair Housing Choice.

HUD Objective – Decent Housing:

Proposed Outcomes for plan years 2015-2019

- 150 households benefitting from direct homeless prevention services
- **125 housing units to receive rehabilitation and repair**
- **Support new affordable rental housing units to be built by providing resolutions of support for low-income housing tax credit developments in the City with an emphasis on special needs populations**
- **30 new affordable housing units to be built or reconstructed**
- **25 homebuyers to be assisted with home ownership closing costs and down payment assistance**

HUD Objective – Suitable Living Environment:

Proposed Outcomes for plan years 2015-2019

- 1,500 low- to moderate-income persons provided with public services with an emphasis on children, youth, homeless and special needs populations, including elderly, mentally ill, persons with disabilities and victims of domestic violence
- 200 persons receiving new and expanded access to a homeless shelter or homeless supportive services in Collin County
- 100 persons receiving new or improved access to health or dental services
- **150 persons provided new or improved access to transportation services with an emphasis on special needs populations such as elderly, mentally ill, persons with disabilities, youth and children**

HUD Objective – Expanded Economic Opportunities:

Proposed Outcomes for plan years 2015-2019

- 60 low- to moderate-income persons to receive job and employment training

Impediment: Housing Affordability and Insufficient Income

The City of Plano passed Resolution No. 2015-12-6(R) to establish an application and evaluation process for Housing Tax Credit resolutions and maintains an on-line application for resolutions continuously available to developers. The resolution was amended with Resolution No. 2016-11-4(R) to add a fee waiver for Certificates of Occupancy for applicants receiving a resolution of support. The application provides clear criteria for obtaining both a resolution of support and a resolution of no objection for housing tax credit projects seeking TDHCA approval. The City application criteria emphasize preferences for connection to the City's needs assessment and market analysis in its Consolidated Plan, project sites with access to public transportation and access to high opportunity areas defined as a poverty rate below 10% or area median income greater than 80%, mixed income developments with 20% market rate units, energy efficient development plans, and redevelopment of existing multifamily developments. The Veranda Townhomes was approved by TDHCA in 2016 including 20 market rate and 20 LIHTC units in census tract 316.39. The City of Plano incorporated goals in its Consolidated Plan to support LIHTC projects, build additional affordable units, and assist home buyers with closing cost and down payment assistance. As of its most recent action plan, the City has provided direct financial assistance to four low income home-buying households and added eight units of affordable housing its CDBG and HOME funding. The City is also in the process of developing a housing plan to identify and address housing needs and gaps now and in the future that will guide planning and policy. The City's Concerted Revitalization Plan calls for the development of 1,000 units of housing adjacent to public transit, while promoting "a variety of housing types and price points." Most units built since 2017 are rental housing units. The City of Plano has provided eight resolutions of support and one resolution of no objection to LIHTC projects proposed in Plano since 2016.

Impediment: Public policy and fair housing infrastructure impediments

In April 2018, the City collaborated with First Christian Church to host a Fair Housing Symposium and partnered with Inclusive Communities Project, North Texas Fair Housing Center, Legal Aid of Northwest Texas, and Metro Dallas Homeless Alliance to deliver the program. Each of these partners spoke on a different topic related to Fair Housing, including the history and context of the Fair Housing Act, rights guaranteed under the Act, state landlord/tenant law, and how to search for affordable housing. In addition to partner organizations who provided speakers, eight other non-profits provided informational booths for attendees to learn about other services available in the community. A total of 100 people, not including City staff, attended the symposium. The City plans to offer this event on an annual basis in the future and anticipates adding a Spanish language component beginning in 2019 (City of Plano, 2018).

Impediment: Expanded services areas and increased access to public transportation is needed to address mobility for transit dependent persons

The City of Plano incorporated goals to improve public transit in its 2015 Comprehensive Plan, including:

- Inform citizens and promote Dallas Area Rapid Transit (DART) services offered in Plano to city residents.
- Increase the number of public transit options throughout all of Plano by working with DART to enhance service provision.
- Study the feasibility and identify the required infrastructure and routes for a Bus Rapid Transit Program.
- Investigate feasibility of partnerships regarding for the provision of trolley services with major destination areas.

The City of Plano began working in 2017 with private businesses in northwest Plano to incubate the Legacy Transportation Management Association to deploy transportation information, foster ride-sharing and consider other privately funded strategies such as shuttles to help employees get to and from work and local retailers or services. The City recommended additional public transit service in its special study of the Legacy business area to promote access to employment by transit dependent workers. DART continues to provide reduced cost transit through the Senior Rides program, which was originally established in partnership with the City. Trips provided increased from 2,864 in 2015 to 3,297 in 2016. The City also incorporated a goal in its Consolidated Plan to use HUD funding to improve access to transportation for 150 seniors, persons with disabilities, youth and children.

Impediment: Banking, finance, insurance and other industry related impediments

The City continues to work informally with banks and lenders to encourage them to offer products that better meet the needs of low-income household and those with credit issues. The City also continues to offer its First Time Homebuyer class once a month, which is open to all residents of Plano and Frisco. The City also maintains a referral relationship for financial literacy education and housing counseling with GreenPath, a local non-profit credit counseling agency.

Impediment: Socio-economic impediments

The City of Plano has continued to be an employment growth center, including many initiatives that attract investment capital and jobs into the City of Plano.

- Census tracts in Plano range from a score of 6 to 10 on a national index of capital investments with 10 being the highest scoring census tracts with the greatest capital investment. The City successfully supported the identification of census tract 320.13 as an Opportunity Zone for the purpose of receiving investment benefits created by the federal Tax Cuts and Jobs Act of 2017.
- Employment in Plano increased by 2.4% from 2016 to 2017 anchored by major new developments, including recruitment of new corporate campuses and employers (Toyota, Frito-Lay, USAA, etc.) especially in the northwest sector of the City. Wages in Plano are generally higher than average for the US. Median monthly earnings increased by 1.7% from 2015 to 2016.
- The City created an implemented an affirmative fair housing marketing plan.

Impediment: Neighborhood Conditions Related Impediments

The City of Plano Consolidated Plan uses HUD funding to repair homes for low income and senior householders. Sixty-three homes have been rehabilitated since 2015. The City of Plano's Neighborhood Empowerment Zone and Tax Increment Financing Zone policies continue to support revitalization of lower income neighborhoods. The TIF program currently includes four projects supporting residential development. The City of Plano uses its Neighborhood Enhancement Tool to target communities needing the supports available through the LWYL program, which provides social transformation through education, awareness and neighborhood engagement and physical transformation through neighborhood cleanups and home repair projects. Beginning in April 2017, the City began hosting free property maintenance workshops for homeowners. Additionally, the Great Update Rebate program incentivizes owners of older homes to repair and make updates to their properties by providing a rebate based on the funds they invest in improvements. The City's Concerted Revitalization Plan also supports and integrates with TIF, NEZ, and Consolidated Plan resources for neighborhood improvement.

Consolidated Plan Progress

The City of Plano publishes its progress toward Consolidated Plan (Con Plan) goals in its annual Consolidated Annual Performance and Evaluation Report (CAPER) (City of Plano, 2017). The following progress is from the City's CAPER for plan year 2016. Figure 23 displays before and after photos of home rehabilitation funded by Plano's home repair programs. Figure 24 displays the City of Plano CAPER for 2016.



Figure 23: City of Plano home repair program participants, before and after rehab

The City of Plano established 10 goals for 2015-2019. Figure 24 lists the goals selected with the source and amount of funding allocated to each goal and indicators of goal achievement with expected and actual quantitative results. As of the end of Year Two of the five-year Con Plan, the City of Plano has exceeded or made substantial progress toward six of its ten goals for the 2015-2019 Con Plan period.

Goal	Category	Source: Amount	Indicator	Unit of Measure	Expected: Strategic Plan	Actual: Strategic Plan	Percent Complete	Expected: Program Year	Actual: Program Year	Percent Complete
Homeless Prevention	Homeless	CDBG: \$102,000	Homelessness Prevention	Persons Assisted	150	197	131.33%	105	157	149.52%
Homeless Shelter and Services	Homeless	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	79	100%	39	61	156.41%
Homeless Shelter and Services	Homeless	CDBG: \$65,135	Homeless Person Overnight Shelter	Persons Assisted	200	79	39.5%	39	61	156.41%
Homeownership	Affordable Housing	CDBG: \$10,278 HOME: \$4,513	Direct Financial Assistance to Homebuyers	Households Assisted	25	4	16%	6	1	16.67%
Housing Rehabilitation	Affordable Housing	CDBG \$692,058 HOME: \$161,695	Homeowner Housing Rehabilitated	Household Housing Unit	125	63	50.4%	31	30	96.77%
Job Training	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	60	0	0.00%	0	0	0%

Figure 24: Program accomplishments for Plano's Consolidated Plan, 2016 Consolidated Annual Performance and Evaluation Report, published 12/17

Goal	Category	Source: Amount	Indicator	Unit of Measure	Expected: Strategic Plan	Actual: Strategic Plan	Percent Complete	Expected: Program Year	Actual: Program Year	Percent Complete
Public Services - Medical/ Dental	Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%	0	0	0%
Public Services - Special Needs	Homeless Non-Homeless Special Needs	CDBG: \$35,000	Public service activities other than Low/ Moderate Income Housing Benefit	Persons Assisted	1500	404	26.00%	158	158	100.00%
Public Services - Transportation	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/ Moderate Income Housing Benefit	Persons Assisted	150	0	0.00%	0	0	0%
Supply of Units	Affordable Housing	HOME: \$145,305	Home-owner Housing Added	House-hold Housing Unit	30	8	26.67%	5	4	80.00%

b

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

Goals to prevent and address homelessness, rehabilitate housing and assist households with special needs are being met or exceeded. Goals to address medical/dental, transportation and job training have faced challenges or required funding from other sources due to the 15% limit in the use of CDBG funds to cover public services.

The rapidly rising price of single-family homes significantly affected the City's ability to meet its goals to support home ownership during the timeframe of the Con Plan. In January 2014, the median sales price of an existing home was \$215,000 (Jones, 2018). By June 2016, the median price of an existing home was \$312,000, an increase of 45%. In January 2014, the price of new construction was \$301,670. The price of new construction for a single-family home increased to \$393,460 by June 2016 or 30%. For the Indicator: Home Owner Housing Added, the City completed a total of eight units during the first two years of the Con Plan, slightly short of its Expected Strategic Plan goal of six units per year. For the Indicator: Direct Financial Assistance to Homebuyers (First Time Homebuyer Program, FTHB), the City served four households , slightly short of its Expected Strategic Plan goal of five households per year.

The City's transportation services goal has been addressed through a collaborative program with DART (Dallas Area Rapid Transit) and the Wellness Center for Older Adults to provide reduced cost rides to Plano seniors with no other means of transportation through the Senior Rides program (Dallas Area Rapid Transit, 2018). This program is not funded using HUD dollars. In FY 2015, the program provided 2,864 trips to 63 clients. In FY 2016, the program provided 3,297 trips to 67 clients. In the first quarter of 2017, the program provided 776 trips to 57 clients. As of January 2018, the program is being administered solely by DART.

The City's goal to provide job training has been a struggle and is awaiting identification of a service provider. On April 3, 2018, the City hosted a round table in which local nonprofit executives and City staff brainstormed solutions and best practices related to job training, dental care and transportation. Ideas for potential solutions between the City and nonprofit partners will be evaluated and considered for future implementation.

Medical/dental service goals have been achieved through a partnership with Buffington Community Services (medical providers) and funded through a Community Services grant (City general funds, non-HUD). This partnership has provided a variety of medical services to individuals, families and households for a total of 3,349 units of service during the first two years of the Con Plan.

C

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

The City has made the following changes to the FTHB program to mitigate the challenges created by rising home prices:

1. In 2015, the City increased the maximum amount of assistance from \$10,000 to \$20,000 and increased the maximum home purchase price from \$145,000 to \$165,000. In 2016, the City increased the maximum purchase price to HUD's homeownership value limit of \$214,000.
2. Beginning in August 2018, the City will increase the amount of assistance to \$45,000 for households below 80% of the area median income (AMI) and \$55,000 for households below 60% AMI. Additionally, the limit on cash assets will be increased from \$20,000 to \$30,000.
3. CDBG regulations require homebuyers to match the amount of down payment assistance given. The City exchanged existing CDBG funds that were allocated to FTHB with HOME funds allocated to the Housing Rehabilitation program, giving more HOME funds (and less CDBG) to FTHB. Increased HOME funding allows the City to serve more buyers with the maximum \$20,000, since many are unable to match over \$10,000 with their own funds.
4. Beginning in January 2017, marketing and outreach to realtors and lenders was greatly increased, and the FTHB coordinator became actively involved in the real estate community, attending lender meetings and open houses. More real estate agents and lenders are now familiar with the program and can better inform their clients who may qualify.
5. In January 2017, the City increased the maximum debt-to-income ratio for buyers in its FTHB program from 30:45 to 36:45, allowing buyers to have a slightly higher monthly payment, thereby opening the door to more potential program participants.

To increase capacity to meet its goal for Supply of Units, the City has encouraged its sub-recipients/developers to consider projects in which they acquire, rehabilitate and sell a home to low-income buyers instead of searching for vacant land for new construction. The City has very little vacant land remaining and there are more opportunities to purchase homes that are in disrepair and rehabilitate them, selling them at an affordable price to a low/moderate-income buyer. Developers are also encouraged to increase the number of people they can assist by adding an additional bedroom during an acquisition/rehabilitation or build duplexes on vacant lots when the lot size allows.

The City is also in the process of developing a Housing Plan, which will identify current housing needs and gaps; address projected future needs and gaps; and formulate recommendations to guide growth, development, redevelopment and strategic planning activities (City of Plano, 2017). The resulting strategic plan will allow the City to better understand housing needs, both market rate and affordable, as a community and within a growing region. It will establish a framework to determine how the City can assess and guide housing developments to ensure that neighborhood stabilization and revitalization efforts continue. The plan is intended to provide the tools necessary to think creatively about housing development and adaptation as well as compatibility with anticipated neighborhood center redevelopment projects.

d

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

The City of Plano's experiences with supporting affordable home purchases and the development of additional affordable housing have informed its emphasis on developing new strategies for increasing the supply of affordable housing. The City has directly experienced the dramatic impact of the rising cost of housing in pursuing its Consolidated Plan goals. In future goals, the City will address barriers to increasing the supply of affordable housing by strategies, including:

- Conducting a comprehensive housing assessment to best target resources to market segments (by percent of AMI) and price points with the greatest gaps between supply and need
- Developing more effective policies and incentives for the development of affordable housing
- Collaborating with developers, owners, funders and providers of affordable housing to identify barriers and improve programs
- Develop strategies to incorporate the development of affordable housing into economic redevelopment plans
- Evaluate home buyer assistance programs and research best practices to improve program effectiveness



SECTION IV

FAIR HOUSING

ANALYSIS

IV. Fair Housing Analysis

A. Demographic Summary

1

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

Overall trends 1990-2013

From 1990 to 2013, the racial and ethnic composition of the City of Plano changes significantly for some ethnic groups. Figure 25 displays changes in percentages of each racial and ethnic group from 1990 to 2013. During this period, the white population declines dramatically from 85.4% to 58.8% of Plano's overall population. This change appears slightly greater than regional trends, where the proportion of white residents also declines from 70% in 1990 to 50% in 2013. Figure 26 shows the regional population trends over time for major races and ethnicities in the DFW region.

While the share of white residents declines both at the jurisdictional and regional level, the Hispanic population expands at both levels. In Plano, from 1990 to 2013, the Hispanic population adjusts from 6.2% of the overall population in 1990, to 14.6% in 2013, and the regional Hispanic population increases from 13% in 1990 to 27% in 2013.

As for the black population, City and regional levels experience slightly dissimilar trends. In Plano, the share of black residents increases from 4% to 7.4% between 1990 and 2013. Regionally, the share of black residents remains relatively unchanged with a slight increase from 13.7% (1990) to 14.6% (2013). Native Americans do not account for a significant share of the population in Plano or the region. In Plano, the proportion remains 0.3% in 1990 and 2013, with a slight increase in intermediate years. In the region, the share of Native American residents experiences no significant change.

Finally, the Asian/PI population share in Plano increases from 3.9% in 1990 to 16.5% in 2013. Regionally, the Asian/PI population increases 2% to 5%.

Plano's demographic changes from 1990 to 2013 vary significantly from the region because its increase in the proportion of Asian/PI residents differs dramatically from the region and its black population moved closer towards the regional proportion.

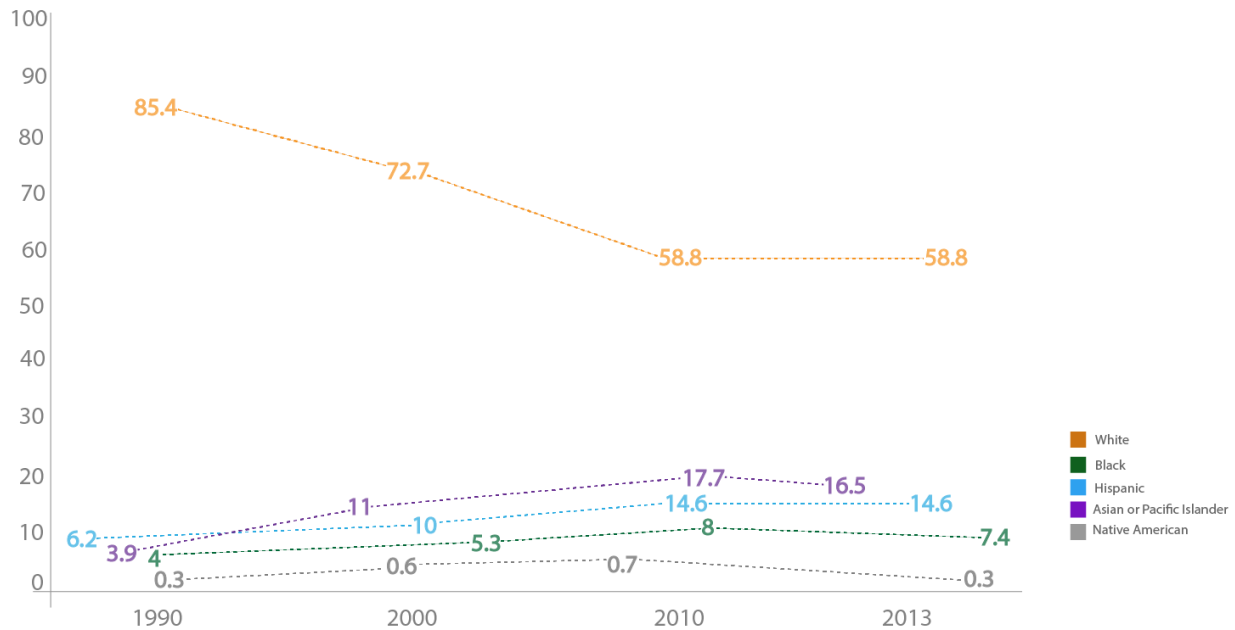


Figure 25: Percent of population by race and ethnicity over time, City of Plano, U.S. Decennial Census/ACS

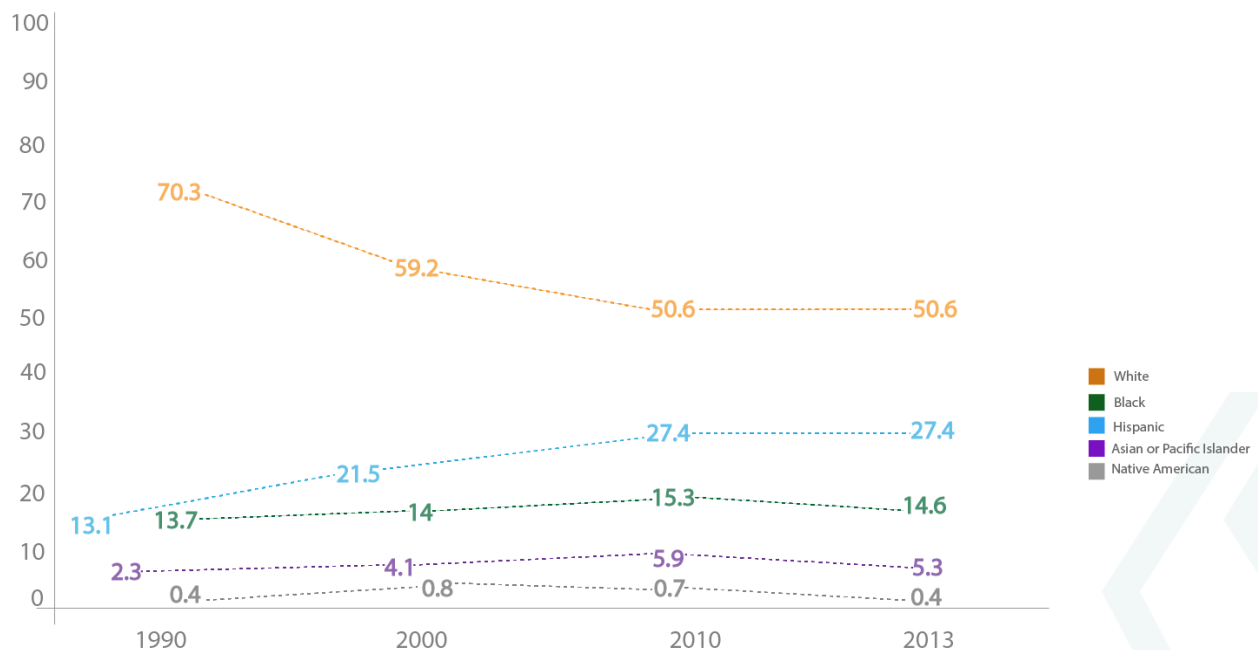


Figure 26: Percent of population by race and ethnicity, NTRHA region, U.S. Decennial Census and ACS

Figure 27 spatially represents the demographic trends in Plano using maps that represent the racial or ethnic concentration at the census tract level for the years 1990, 2000, 2010 and 2015 (U.S. Decennial Census and the American Community Survey). As the racial or ethnic concentration increases, the shade on the map darkens.

In 1990, white residents appeared to be prevailing throughout Plano other than the area east of US 75. By 2015, the concentration of the white population decreases throughout the city. In 1990,

the black population primarily lives east of US-75. From 1990 to 2015, the areas with greater concentrations of black residents increase and spread.

The area surrounded by Hedgcoxe Road, Red River Drive and Alma Drive and the area surrounded by US 75, Alma Drive, West Spring Creek Pkwy and West Park Road witness a potential concentration of black residents due to an increase from the 10.0%-20.0% range to the 20.1%-30.0% range.

The overall growth of the Hispanic population translates into the expansion of geographic clusters of Hispanic residents. In 1990, the highest concentration of Hispanic residents is adjacent to US 75 on the east side and along the southern border with Richardson. From 2010-2015, the Hispanic population appears to disperse more uniformly throughout the city because the areas of concentration decrease in number and intensity while the overall percentage of Hispanics remains constant.

In 1990, Asian/PI households made up between 0.0% and 10.0% of the population throughout the city of Plano. In 2010, the most highly concentrated census tracts (40.1% to 55.7%) appear in the north between SH 121 and Hedgcoxe Road and in the southeast between 14th Street and Thomas Drive. Neighborhoods with a relatively lower concentration of Asian/PI appear in central and eastern Plano. In 2015, pockets of relatively high concentrations of Asian/PI disappear between SH 121 and Windhaven Parkway while they shift farther east.

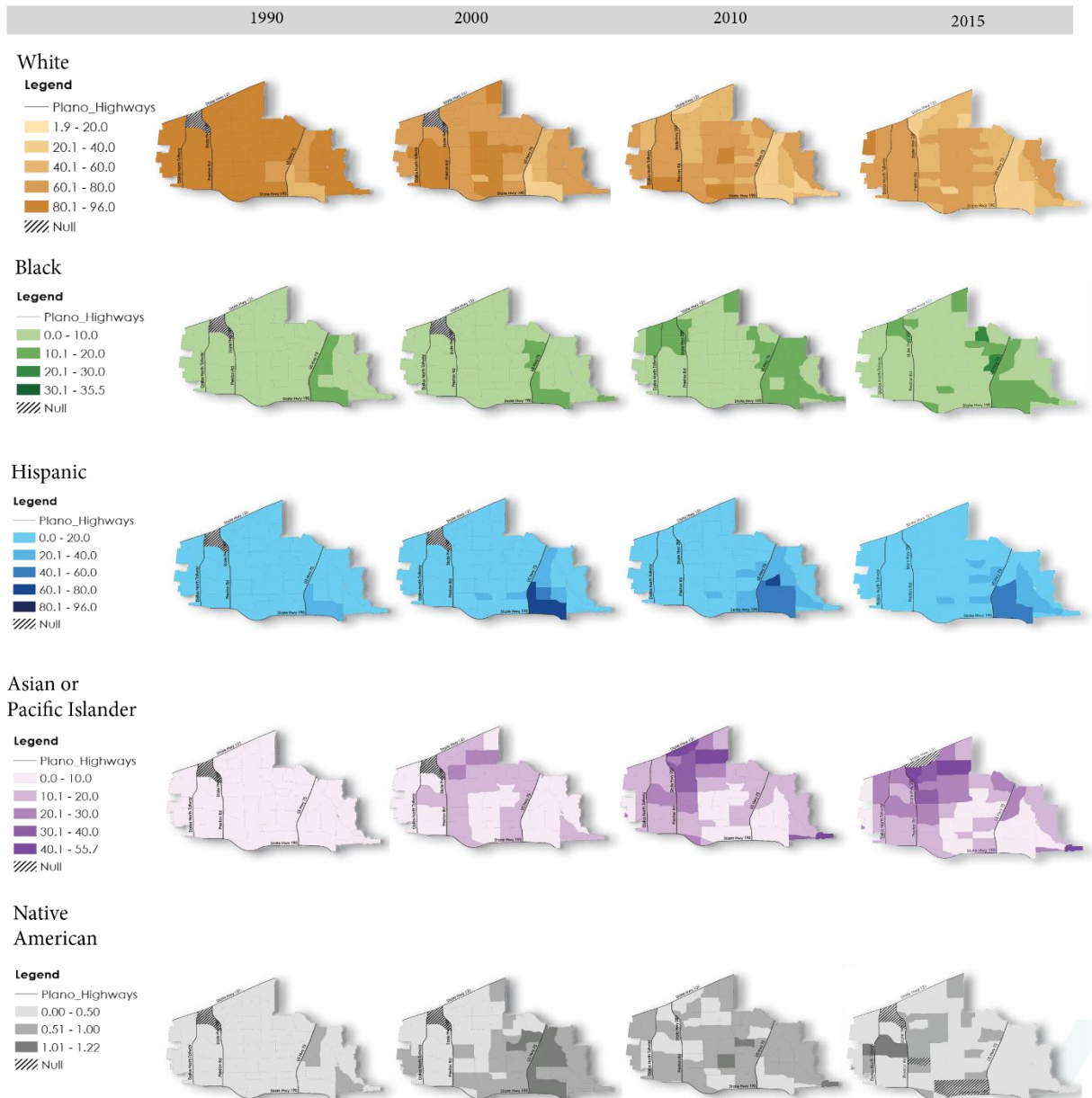


Figure 27: Percent of population by census tract for race and ethnicity, City of Plano

B. General Issues

i. Segregation / Integration

1. Analysis

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

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

In 2013, all comparison groups (Figure 28) aside from Hispanics register low segregation in Plano. The Plano Hispanic population appears moderately segregated in 2013. With a value of 43 in 2013, the Hispanic group records the highest level of segregation in the city. In all cases, Plano has a lower dissimilarity index score than the corresponding regional score. At the regional level, segregation appears moderate except for the black population, which experiences high segregation.

Dissimilarity Index: Jurisdiction/Region

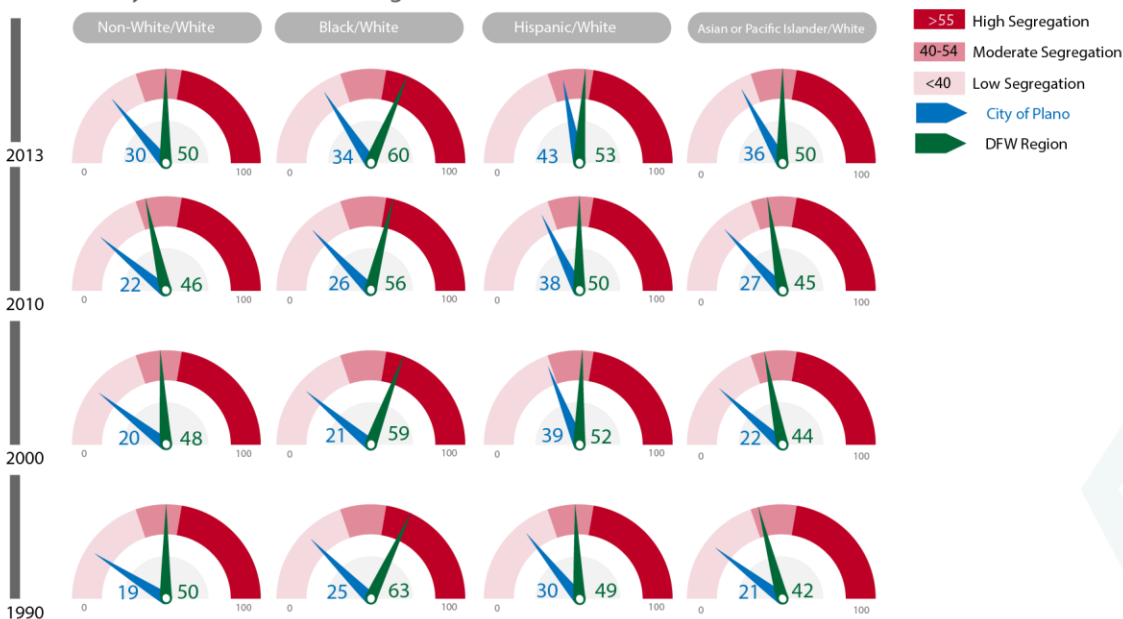


Figure 28: Dissimilarity index scores over time, HUD AFH

Figure 29 displays demographic information on race, ethnicity, percent foreign born and residents with limited English proficiency (LEP) to ground the following discussion with the most recent U.S. census data available (2016). Plano continues to be significantly more white, less

black and Hispanic, but with more foreign born and Asian residents than the DFW region as a whole.

	White non-Hispanic	Black	Hispanic	Asian/PI	Foreign born	LEP
Plano	55.3%	8.0%	14.8%	19.2%	24.3%	6.9%
DFW	48.3%	15.3%	28.2%	6.2%	17.7%	7.2%

Figure 29: Demographic characteristics of Plano and DFW region, ACS 5-year est., 2012-2016

Demographics of census tracts by level of segregation

The following information investigates the demographic composition of census tracts with different levels of segregation in Plano in 2015 as indicated by the degree of difference between census tracts and the City as a whole. Levels of segregation are defined in Figure 30. Level 1 is defined as census tracts in which the percent of white residents is greater than the percent of white residents in the City as a whole. Level 7 characterizes census tracts in which the percent of non-white residents is more than 40% greater than the percent of non-white residents in the City as a whole. Level 7 reflects the most extreme case of segregation. No census tracts in the City experience the most extreme case of non-white segregation (Level 7).

Level	Definition: Census tract compared to jurisdiction
1	Greater white population share than jurisdiction (red)
2	Census tract share matches jurisdiction (yellow)
3	Up to 10% greater than jurisdiction percent (lightest green)
4	Up to 20% greater than jurisdiction percent
5	Up to 30% greater than jurisdiction percent
6	Up to 40% greater than jurisdiction percent (darkest green)

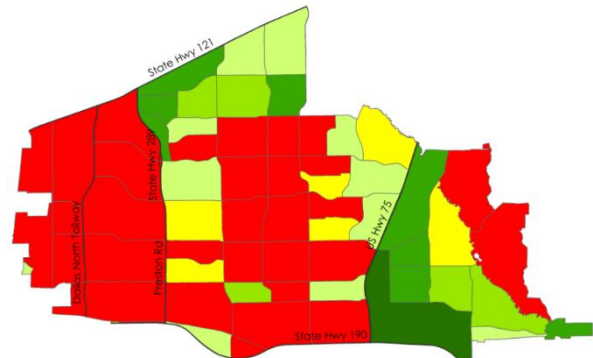


Figure 30: Definitions of levels of segregation

Demographic composition is examined in Figure 31 for residents living in each census tract aggregated by level of segregation with respect to race, ethnicity, Limited English Proficiency, national origin (foreign born), families with children and household income as a percent of area median income. Residents who live in census tracts with the highest levels of minority segregation are more likely to be black, Hispanic, low income and foreign born. The most highly segregated census tracts are highly concentrated with Hispanic and foreign born residents. Integrated census tracts with a racial and ethnic mix that matches Plano as a whole (level 2) have lower concentrations of low income residents.

Segregation Level 2015	% white	% black	% Hispanic	% Asian/PI	% <30% AMI	% 30% to <50% AMI	% 50% to <80% AMI	% Foreign born	% Families w/child(ren)
1	68	5	7	16	5	5	10	18	48
2	57	7	13	17	9	7	16	26	50
3	53	12	10	19	6	7	13	23	60
4	40	15	17	20	10	9	22	29	60
5	32	10	19	33	9	10	14	38	59
6	22	12	49	2	19	12	22	40	60

Figure 31: Demographics of census tracts grouped by level of segregation, ACS 2015

b.

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

Demographics of census tracts by level of segregation

The following maps investigate different levels of segregation for major racial and ethnic groups as indicated by the degree of difference between census tracts and the city as a whole. To supplement the HUD-provided dissimilarity index and assess spatial patterns of segregation, the study creates additional maps to understand to what extent the racial composition of a given census tract significantly differs from the racial composition of the surrounding jurisdiction or region by assessing whether a statistically significant difference between the racial makeup of a census tract (conventional equivalent of a neighborhood) and the overall jurisdiction exists. Figure 32 defines the levels of segregation. Level 1 represents census tracts where the percent of white residents is greater than the percent of white residents in the city as a whole. Level 7 characterizes census tracts where the percent of non-white residents reaches more than 40% greater than the percent of non-white residents in the city as a whole. Level 7 reflects the most extreme case of segregation. (For the full methodology, refer to Appendix A.)

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

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

PATTERNS OF SEGREGATION NON-WHITE/WHITE

The maps below show levels of segregation for census tracts in Plano in 2015. The following maps compare the percentage of each racial and ethnic group in each census tract to the jurisdiction average to determine the size of the difference. As discussed in the previous section, Plano registers low levels of segregation between non-white and white residents; however, Figure 33 clearly illustrates the significantly greater concentration of white residents in west and far-east Plano. A considerable cluster of white residents also reside in central Plano between US 75 and Coit Road. The concentration of non-white residents remains greater in the northern and eastern portions of the City.

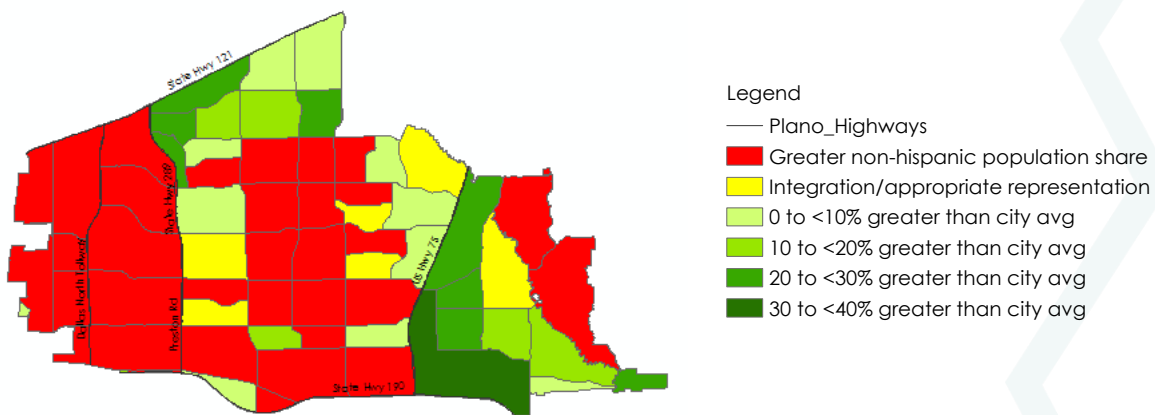


Figure 33: White/non-white segregation in Plano, ACS 2015

Segregation: black vs. non-black

Figure 34 displays the level of segregation black residents in Plano experience. No census tracts experience greater than a 10% difference in population proportion from the overall City proportion for black residents. The census tract sections with low black segregation levels appear throughout Plano except in the central and western parts.

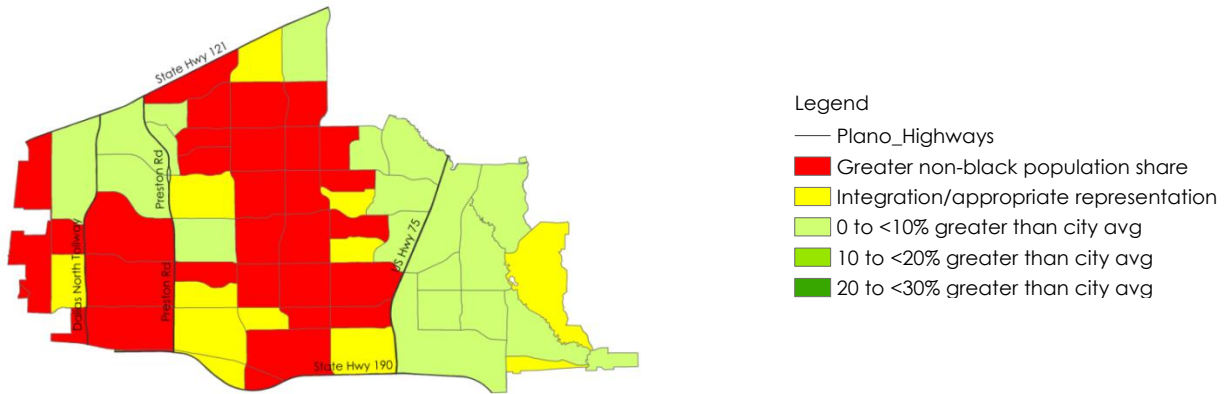


Figure 34: Comparison of percentages of black and non-black residents by census tract with city averages, US Census, 2010

Segregation: Hispanic vs. non-Hispanic

Figure 35 shows that the Hispanic population appears to experience more severe concentration, especially east of US 75 where the percentage of Hispanic residents exceeds the City average by more than 40%. The Hispanic population clusters near US 75 with greater concentrations occurring east of US 75. The Hispanic residents appear underrepresented in most census tracts west of Custer Road.

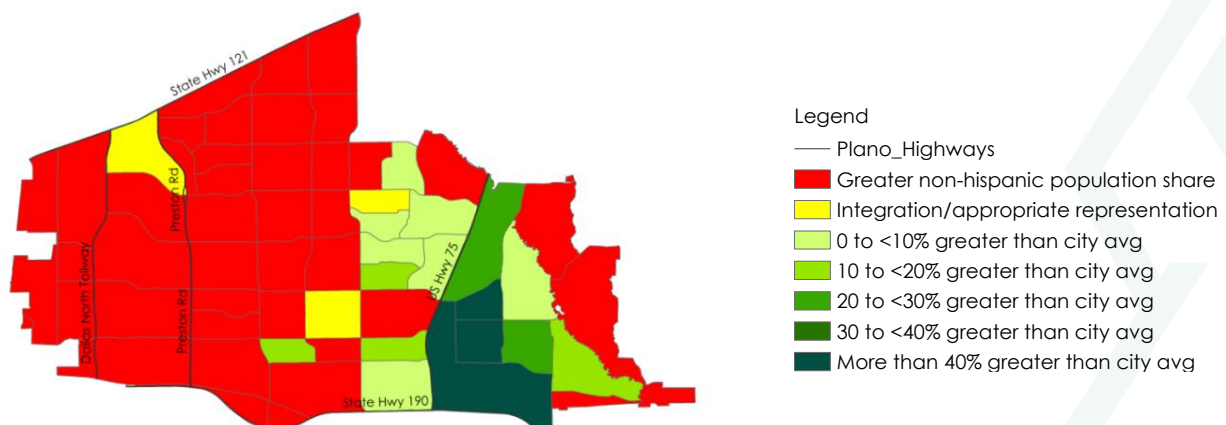


Figure 35: Percentage of Hispanic and non-Hispanic residents by census tract compared with city average Hispanic percentage, US Census 2010

Segregation: Asian or Pacific Islander

No census tract experiences (Figure 36) greater than a 30% difference in population proportion from the overall city. However, unlike the black vs. non-black map, the Asian/PI population concentrations occur in a few census tracts in north central Plano east of Preston Road and near SH 121. Extreme southeast Plano also experiences some concentration of the Asian/PI population.

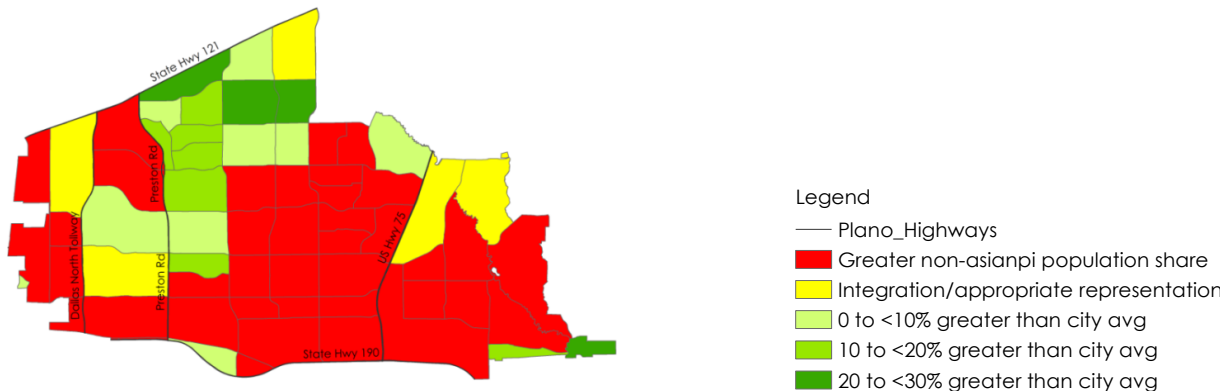


Figure 36: Percentage of Asian/PI and non-Asian/PI residents by census tract compared with city averages, US Census 2010

NATIONAL ORIGIN

From 1990 to 2013, the share of foreign-born residents in Plano more than tripled, increasing from 4% to 13% overall. The most represented country of origin is India, which accounts for 4.9% of residents. A few clusters emerge east of Preston Road and between Legacy Road and SH 121 where the share of foreign-born residents from India (Figure 37) reaches at least 10% greater than the city average. When looking at all foreign-born residents (Figure 38), the city of Plano shows more moderate segregation levels east of US 75.

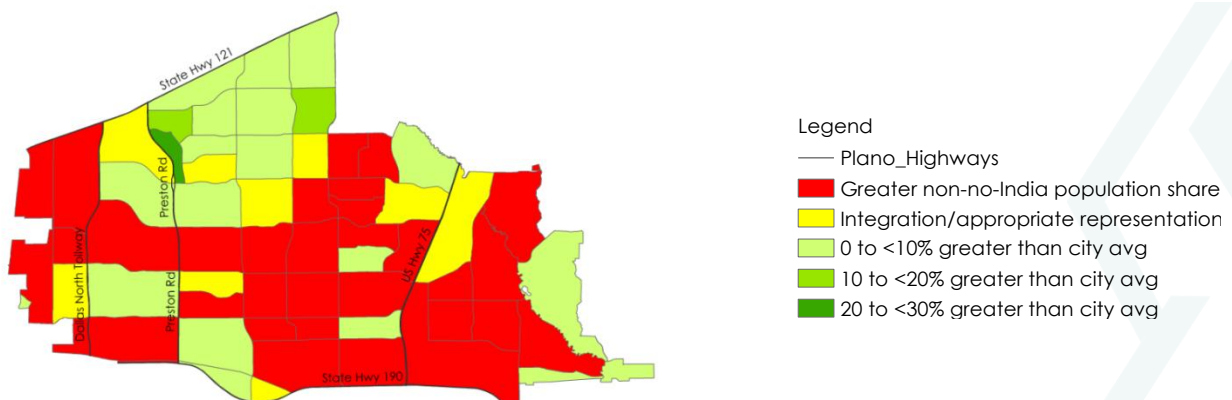


Figure 37: Percent of residents born in India by census tract compared with city average, US Census 2010

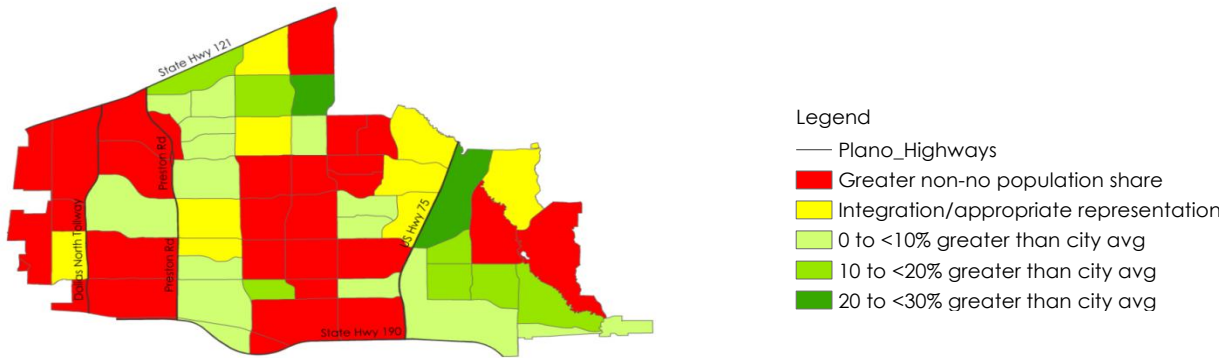


Figure 38: Percent of residents foreign born by census tract compared with city average, US Census 2010

LEP

From 1990 to 2013, the proportion of residents with limited English proficiency (LEP) in Plano increased from 4% to 11.3%. The top three languages spoken in order by percent of all residents are Spanish (4.95%), Chinese (2.17%) and Vietnamese (0.65%). Figure 39 shows that the census tracts with a greater share of LEP Spanish-speaking individuals are in southeast Plano. The map further shows a few areas where the proportion of LEP-Spanish individuals is at least 20% greater than the city average. These areas tend to correspond to the areas with high concentrations of foreign-born residents from Mexico. The highest concentrations of residents with LEP speaking any language occur in east Plano (Figure 40). Most of the non-LEP area occurs in central and western Plano.

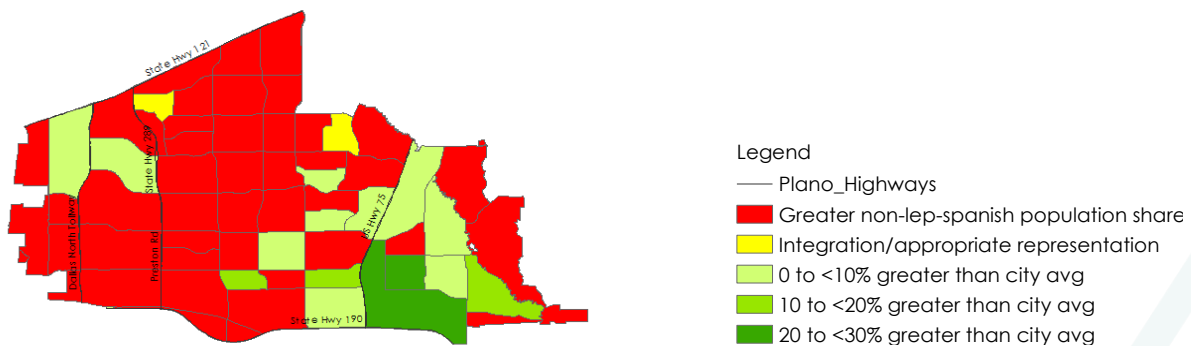


Figure 39: Census tracts with highest percentages of LEP, Spanish-speaking residents compared with City averages, US Census 2010

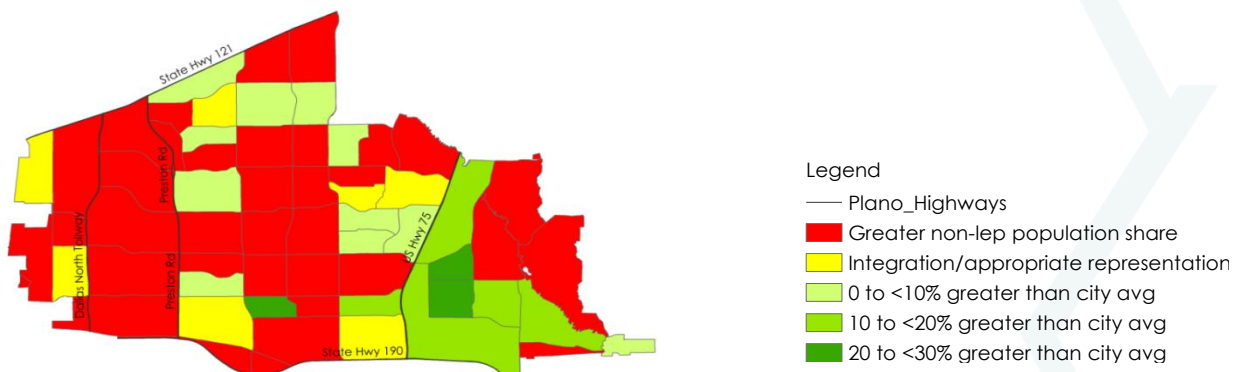


Figure 40: Census tracts with highest percent of residents with LEP (any language), US Census 2010

Patterns of segregation can also be analyzed from a regional perspective. Figure 41 displays the jurisdictions of the 20 cities and housing authorities that make up the NTRHA consortium. This area includes the 13 counties that make up the DFW MSA. Segregation between white and non-white residents, when analyzed at a regional level, appears most severe in sections of Dallas and Fort Worth. Segregation across the region seems more severe than when measured within Plano alone. The dark green sections in the following maps represent census tracts where the percent of non-white residents reaches more than 40 points above the non-white resident proportion in the region as a whole.

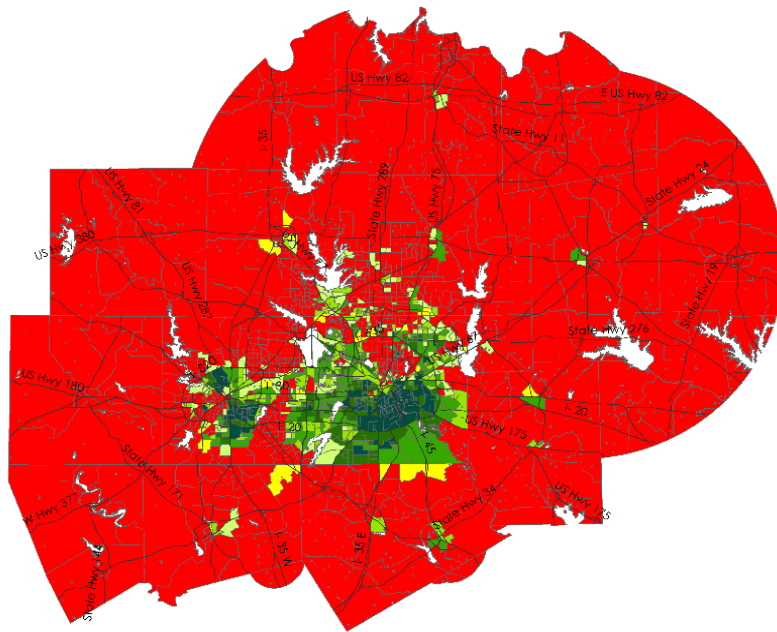


Figure 41: Regional patterns of segregation NTRHA, ACS 2015

c.

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

Figure 42 displays the dissimilarity index scores by race and ethnicity for the City of Plano and the region. In Plano, all dissimilarity index values increase from 1990 to 2013. The non-white, black and Asian/PI populations remain at low segregation while the Hispanic population moves from low segregation to moderate segregation. For all years and all cases, Plano has a lower dissimilarity index score than the corresponding regional score.

At the regional level, segregation appears moderate except for the black population, which experiences high segregation. At the regional level, from 1990 to 2013, the dissimilarity index values for the non-white population remains unchanged. During the same period, the black population experiences a decrease in the dissimilarity index, but it remains high. From 1990 to 2013, the dissimilarity index values for the Hispanic and Asian/PI populations increase.

Dissimilarity Index: Jurisdiction/Region

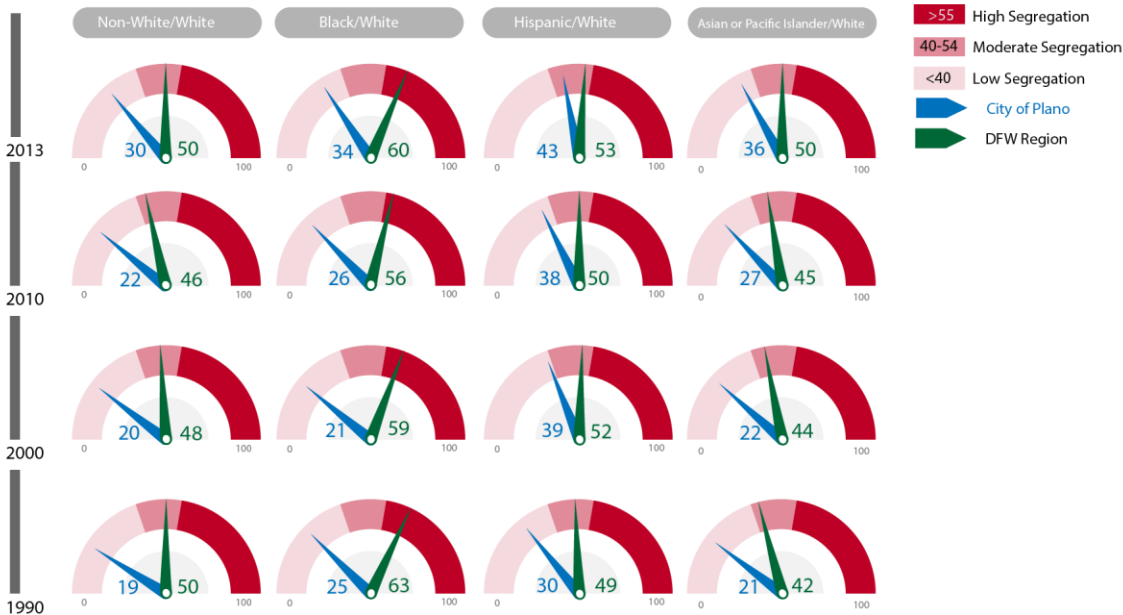


Figure 42: Dissimilarity Index: jurisdiction/region

Spatial patterns of segregation over time

Spatial patterns of segregation remain fairly similar from 2010 to 2015. The percent of non-white residents in east Plano continues to exceed the overall percent of non-white residents for the City by over 30%. The City of Plano displays six tracts of relative integration in 2010 where the racial composition of the neighborhood matches the overall city. Integrated areas occur along (1) Dallas North Tollway between SH 121 and Windhaven Parkway; (2) Legacy Drive between Ohio Drive and Coit Road; (3) between SH 190 and Coit Road; (4) Big Lake Park; (5) area surrounded by West 15th Street, Custer Road, SH 190 and US 75; and (6) East Spring Creek Parkway between Jupiter Road and East Park Boulevard. Areas of integration changed between 2010 and 2015. In 2015, integrated areas occur along (1) Preston Meadow Park area; (2) area surrounded by SH 289, West Park Boulevard, Coit Road and Tulane Drive; (3) Blue Ridge Park; (4) Big Lake Park; (5) Rowlett Creek between Alma Drive and Legacy Drive; and (6) East Spring Creek Parkway between Jupiter Road and East Park Boulevard.

Legend

- Plano_Highways
- Greater white population share
- Integration/appropriate representation
- 0 to <10% greater than city avg
- 10 to <20% greater than city avg
- 20 to <30% greater than city avg
- 30 to <40% greater than city avg

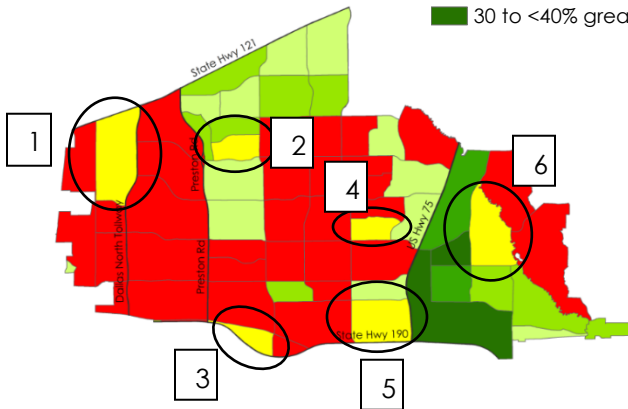


Figure 43: Percent white and non-white by census tract compared with City in 2010

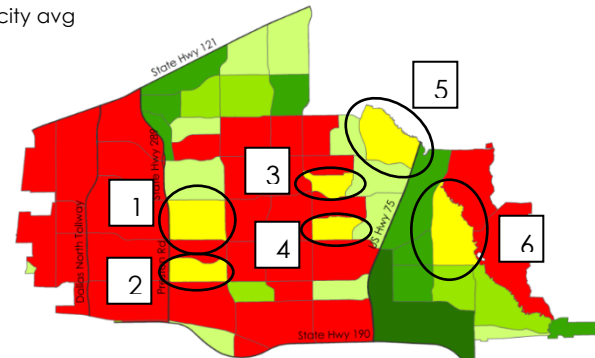


Figure 44: Percent white and non-white by census tract compared with City in 2015

Segregation between white and non-white across the NTRHA region from 2010 to 2015 continues to be most severe in Fort Worth and Dallas while slightly decreasing in intensity.

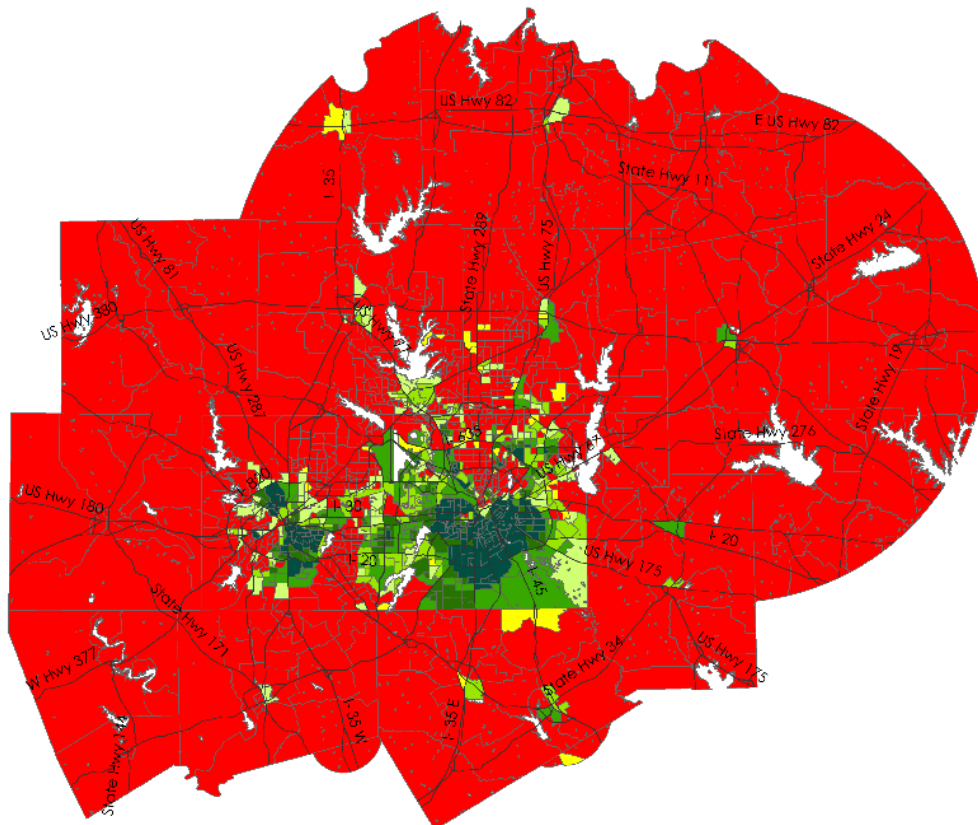


Figure 45: Segregation in the NTRHA region, 2010

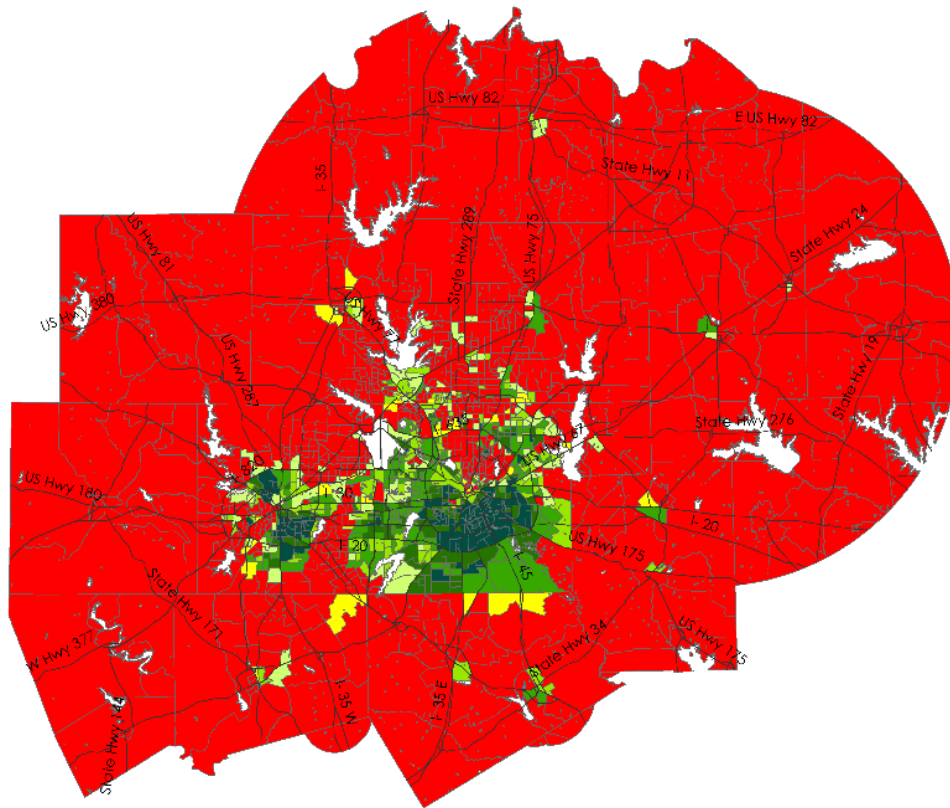


Figure 46: Segregation, white/nonwhite, north Texas region, 2015

d.

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

Figure 47 shows the proportion of renters in Plano. While west Plano's rental proportion appears high, it also has a predominantly white population. The segregated census tracts in east Plano with high Hispanic populations have at least 40% renters. Most of the census tracts in north Plano with higher non-white concentrations have high home ownership rates. Two highly non-white census tracts along Preston Road and near SH 121 have renter rates greater than sixty percent. Home ownership in Plano appears highest in central, north and east Plano where over 80% of residents own their homes and the residents tend to be white or Asian/PI.

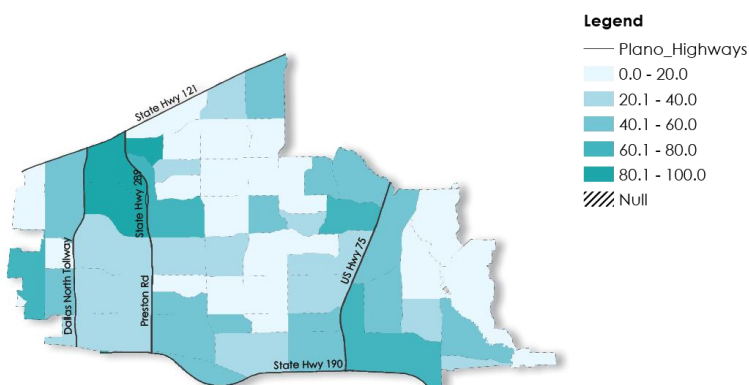


Figure 47: Percent of renters in Plano by census tract, CHAS 2013

Figure 48 shows the proportion of renters in regional scale. The highest concentration of renters (80.1%-100%) is mainly located in the Dallas and Fort Worth areas.

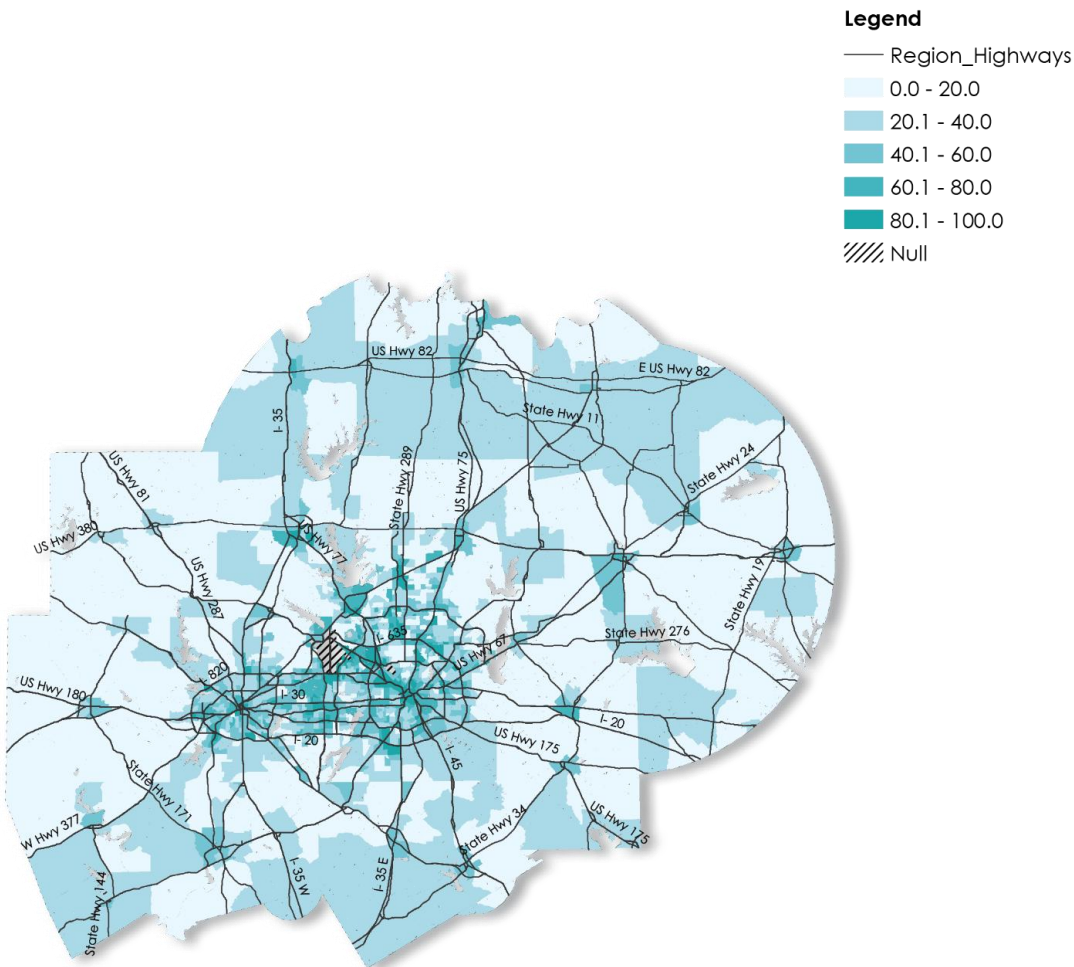


Figure 48: Percent of renters in the region by census tract, CHAS 2013

The following tables describe the housing tenure of census tracts in Plano with increasing levels of white to non-white segregation.

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

As segregation becomes more severe, the proportion of renters per census tract increases. Sixty-eight percent of households are home owners in census tracts where the percent of white residents exceeds the percent of white residents for the City as whole (Level 1). Home ownership

is even higher (74%) in census tracts where the percent of white and non-white residents equals the average rates for the City. Only 37% of households own their own homes in census tracts in Plano where the percent of non-white residents exceeds the City average by over 30%).

Level of Segregation	% Homeowners	% Renters
1	68	32
2	74	26
3	53	47
4	58	42
5	43	57
6	37	63

Figure 49: Percent homeowners and renters by level of segregation of census tract, Plano, CHAS 2010

Level of Segregation	% Homeowners	% Renters
1	69.4	30.6
2	50.6	49.4
3	54.6	45.4
4	48.9	51.1
5	52.3	47.7
6	19.9	80.1
7	NA	NA

Figure 50: Percent of homeowners and renters by level of segregation of census tract, Plano, CHAS 2015

Figure 51 shows that regionally, predominantly white census tracts (level 1) in 2010 had about 72% home ownership and integrated census tracts (level 2) have over 55% ownership. In both 2010 and 2015 (Figure 52), homeownership declines and rentals increase as segregation of non-white residents increases. Homeownership increased slightly in census tracts with the highest levels of non-white segregation (levels 6 and 7).

Level of Segregation	% Owners 2010	% Renters 2010
1	71.9	28.1
2	57.0	43.0
3	49.0	51.0
4	53.1	46.9
5	49.3	50.7
6	42.6	57.4
7	47.4	52.7

Figure 51: Regional percent of homeowners and renters by level of segregation, CHAS 2010

Level of Segregation	% Owners 2015	% Renters 2015
1	72.2	27.8
2	55.5	44.5
3	53.0	47.0
4	47.5	52.5
5	48.6	51.4
6	45.7	54.3
7	50.5	49.5

Figure 52: Regional percent of homeowners and renters by level of segregation, CHAS 2015

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

Segregation within the City of Plano has increased but remained within the low range except for Hispanic/white segregation. Segregation over the region exceeds segregation within the City of Plano, remaining in the moderate range except for black/white segregation (question c above). This pattern reflects national findings that segregation has decreased within cities while

increasing between cities and suburbs (Lichter, Parisi, & and Taquino, 2015). Current conditions that could lead to greater increases in segregation in the future, without changes in policy starting at the state level, include many of the contributing factors discussed below.

- State and local policies that permit source of income discrimination
- State and local policies that emphasize the role of local community approval for new affordable housing projects
- State and local policies that limit the amount of available rental and multifamily housing
- National and regional trends in housing prices and property valuations that exceed increases in local wages for service and support workers.

Dissimilarity Index: Jurisdiction/Region

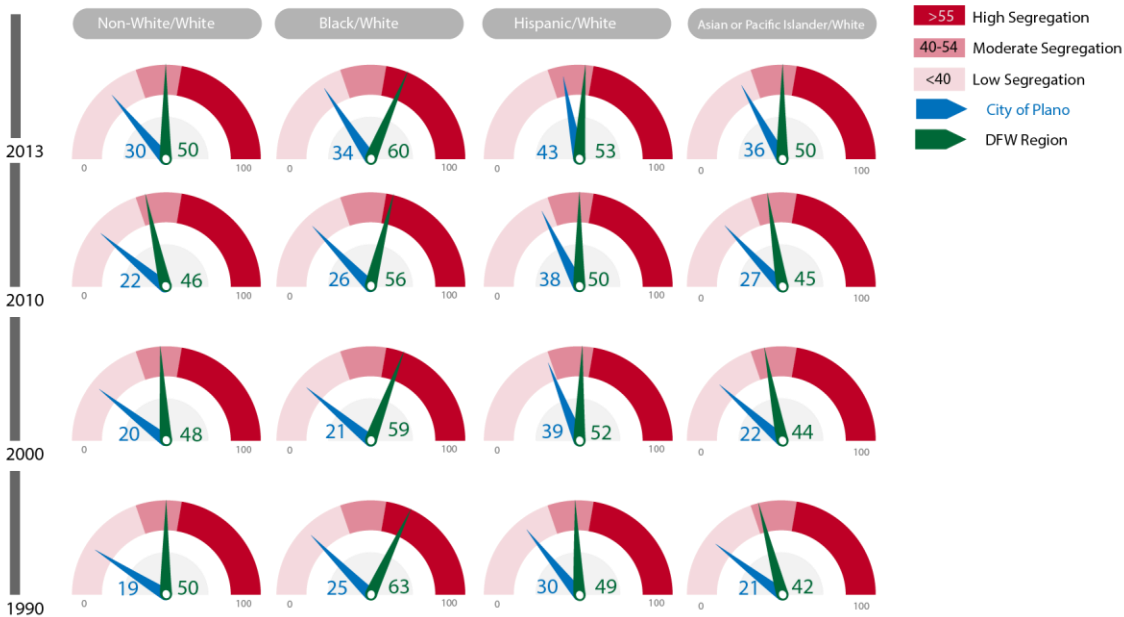


Figure 53: Dissimilarity index scores for the city of Plano and the DFW region over time

2. Additional Information

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

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

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

Thirty-one percent (30.9%) of children in households with single mothers lived in families with incomes below the federal poverty rate in Collin County and had median family incomes of \$44,065 (compared with a median income of \$105,000 for all households with children). Fifteen percent (15%) of children in Collin County live in households with a single mother (Children's Health, 2017).

Figure 54 displays the number of households in each census tract headed by a single mother with her own children under age 6. Census tracts with darker colors have higher numbers of households (e.g., navy blue equals 110 to 130 households), and those with lighter colors have lower numbers of households with single mother with small children (e.g., yellow equals zero households). Less than half (46%) of Plano census tracts contain single mothers with very young children. Plano had an estimated 1,045 households composed of single mothers with very young children. More than half (53%) of these households reside in just seven census tracts.

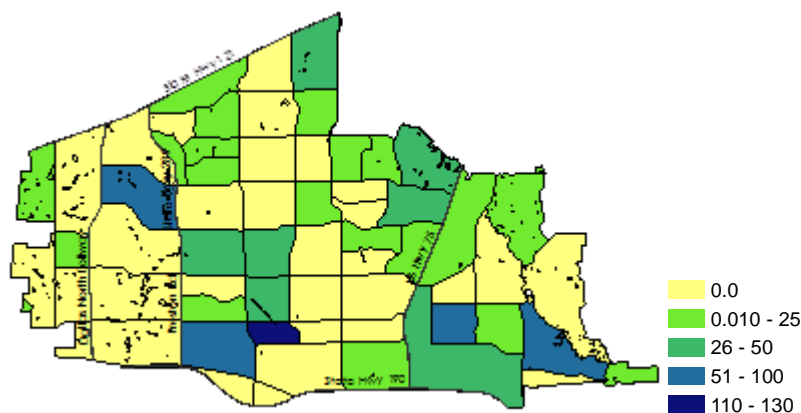


Figure 54: Number of households headed by single mothers with children under age 6 (2015 ACS)

b.

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

Place-based investments

Racially segregated east Plano is anchored by the historic African American Douglass community. The neighborhood is located east of US 75, bounded by two railroad lines (east and south), surrounded by commercial uses, in an area of higher poverty (Residents of Douglass Community, 2002). The neighborhood was home to the first African American residents of Plano, many of whom moved there as former slaves with their masters after the Civil War (Morenz, 2006; Friends of the Plano Library, 1996). Many local landmarks and public facilities are named for influential African American residents. The local segregated African American cemetery (established 1945) is named for Lee Andrew Davis, who began life as a sharecropper and moved to Plano in 1910 during a period of strict segregation under Jim Crow law when “racial discrimination also made it very difficult to acquire property” (Campbell, 2017). Davis became a major property owner and entrepreneur in the community (pictured in Figure 55). Grants from private organizations have allowed sites such as the Davis Cemetery to be preserved and maintained. A mural, pictured in Figure 56, and dedicated in 2006, now honors the community's history. The community, originally settled by whites, became primarily African American after 1894 following the departure of the white Methodist church (Residents of Douglass Community, 2002). The neighborhood included a segregated school for African American children established in 1896 and, later, Plano Colored School (high school, 1950s). In 2002, the City of Plano supported the development of a Neighborhood Action Plan for the predominantly African American community (then over 70%) that focused on improvements in streets, a new park and improved policing to address drug trafficking and speeding (Residents of Douglass Community, 2002). Over half of the homes in the historic neighborhood have received City financial assistance for housing rehabilitation or new construction. Habitat for Humanity has dedicated over 66 homes in the Douglass community since 1989 (Crimmins, 2015). The census tract containing the Douglass community (319.00) has the highest percentage of non-white residents in Plano (78%, 2015 ACS) but has become a predominantly Hispanic community (49%, 2015 ACS) with only 12.5% black residents.

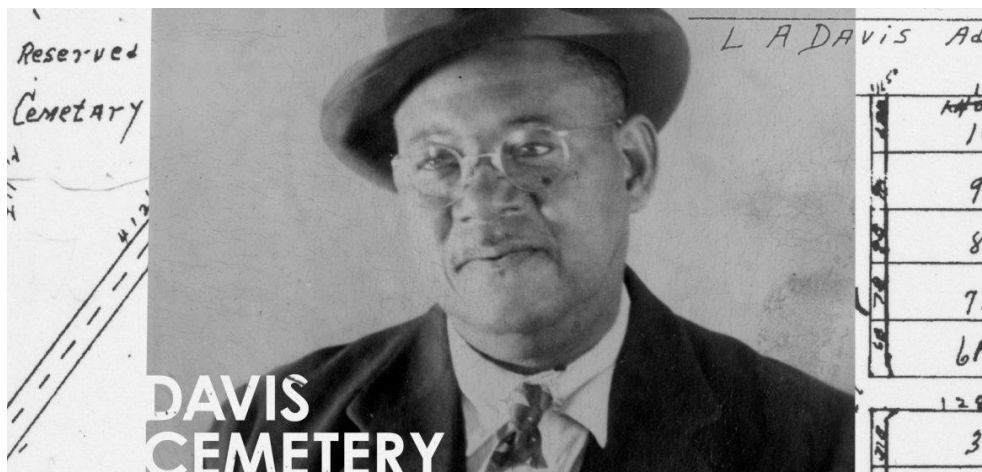


Figure 55: Lee Andrew Davis, entrepreneur, date unknown



Figure 56: Douglass community mural (Douglass Community Neighborhood Association, 2018)

Mobility Programs

The City of Plano is largely a high-opportunity area with lower poverty and lower racial and ethnic segregation than the region. Plano's rapid growth began in the 1960s, as all across the nation predominantly white families moved to new suburbs at the edges of cities favoring single-family development and home ownership, while black families moved north and to city centers (City of Plano, 2018; The National Advisory Commission on Civil Disorders, 1968). Since 1990, macro-segregation (segregation between cities and suburbs within a metropolitan area) has increased while segregation has declined within many cities (Lichter, Parisi, & and Taquino, 2015).

In the Dallas metropolitan area, patterns of segregation set the stage for litigation in *Walker v HUD* beginning in 1985 (Daniel & Beshara, P.C., 2018). The initial lawsuit was against the City of Mesquite, a suburb of the City of Dallas, where the plaintiff was prevented from using a Section 8 voucher. The Walker decision found that "certain housing programs prevented minorities from moving into non-minority areas of Dallas" and the surrounding suburbs (Dallas Housing Authority, 2012). The court ordered (among other remedies) that programs be established to facilitate the use of rental subsidy vouchers in predominantly white, lower poverty communities (Debra Walker, et al., v. U.S. Department of Housing and Urban Development, et al., 2001). The Mobility Assistance Program, operated by Inclusive Communities Project (ICP), resulted from the Walker settlement and serves residents participating in the Dallas Housing Authority's Housing Choice Voucher Program. Families are assisted to use vouchers to obtain housing in higher opportunity areas in seven counties, including Collin. DHA voucher holders may use their vouchers to access housing within the City of Plano, a higher opportunity area. To reverse patterns of segregation, Walker Settlement Voucher holders must move to housing in a Walker Targeted Area defined as a census tract in which the poverty rate is less than or equal to 22.3%, the black population is less than or equal to 25.7% and where no public housing is located (Inclusive Communities Project, 2013). ICP further assists DHA voucher holders to relocate in high-opportunity areas, defined as census tracts in which residents have incomes at or above 80% of the Area Median Income, no more than 10% of residents have incomes below the federal poverty rate and public schools

meet the standards of the Texas Education Agency and have 4-year graduation rates of 85% or higher.

The Dallas Fort Worth region is home to many housing authorities with overlapping jurisdictions. Figure 57 displays the boundaries of the cities and housing authorities engaged in the North Texas Regional Housing Assessment. The housing authorities of Plano, McKinney, Fort Worth, Denton, Greenville, Frisco, City of Dallas and Dallas County have significant areas of overlap. Housing authority jurisdictions overlap such that a single rental property may include residents holding vouchers from several different housing authorities.

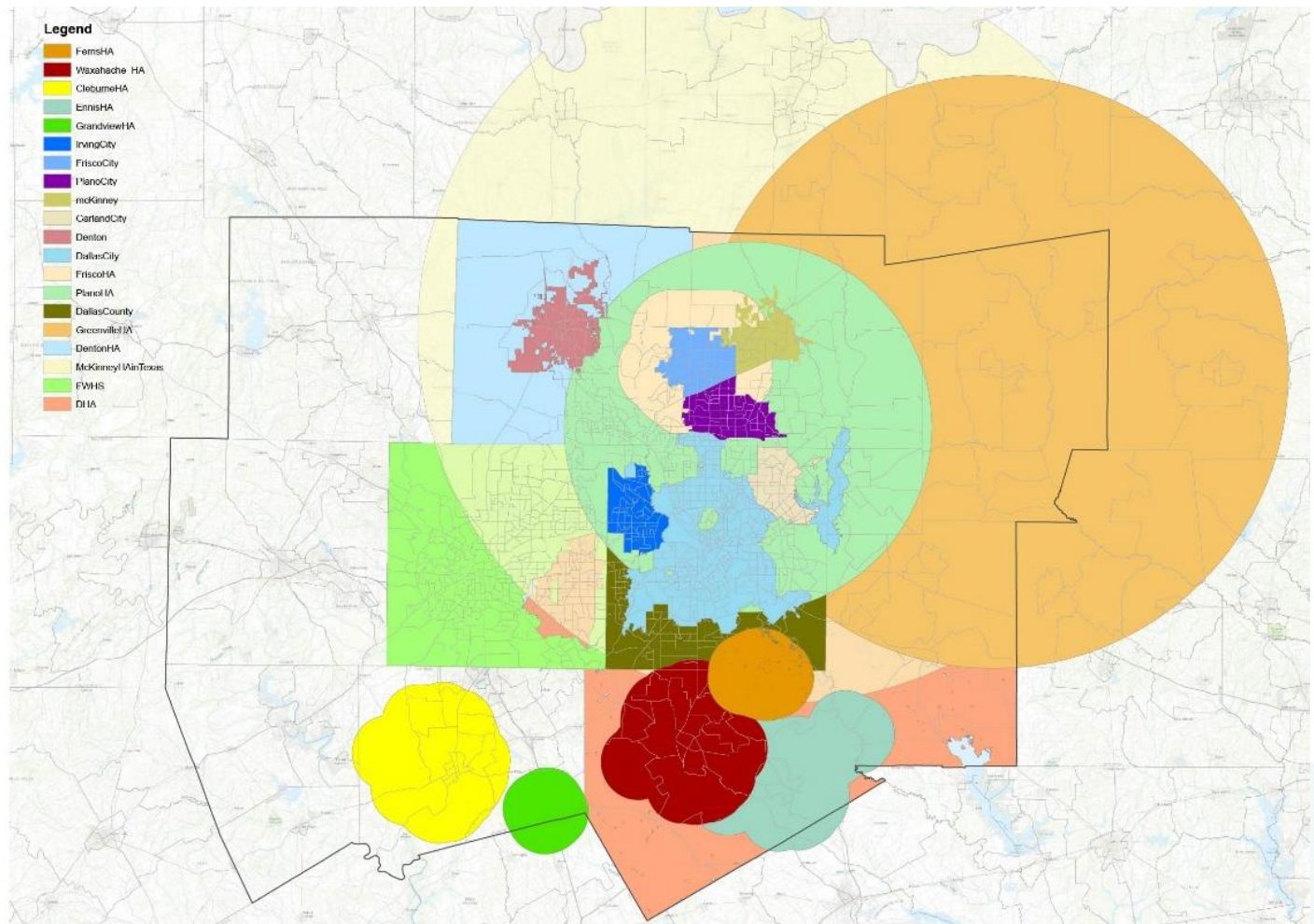


Figure 57: Jurisdictions of the housing authorities participating in the North Texas Regional Housing Assessment

The additive effect of the use of HCVs from multiple housing authorities, including Walker vouchers from the Dallas Housing Authority, is to continue to concentrate their use in a relatively small portion of census tracts in the City of Plano. Three hundred seventy-six Dallas Housing Authority (DHA) Vouchers (2.5% of all DHA HCVs) are being used within the City of Plano as of 2017, some of which are Walker Vouchers. Figure 58 shows the location of the 935 Housing Choice Vouchers from all housing authorities in use throughout the City of Plano, including 371 Plano Housing Authority (PHA) vouchers. DHA vouchers represent approximately 50% of vouchers from all NTRHA housing authorities used in Plano, and PHA accounts for approximately 50%. One hundred sixty-two, or 17% of the total HCVs used in Plano, are concentrated in census tract 319.00 in southeast Plano (in red) with the majority (129) in use in one LIHTC property for

seniors. Four hundred fifty-six HCVs (49%) from all NTRHA sources are in use in only four (5.5%) of Plano's 73 census tracts. Most of these vouchers (327) are in use at four LIHTC properties. PHA representatives make regular visits to properties where their clients are located within Plano, talking with managers and surveying property conditions to identify and address problems (Young, 2017). One hundred seventy-six HCVs from NTRHA consortium members are in use in the City of Allen with 48 (27%) located at one LIHTC property.

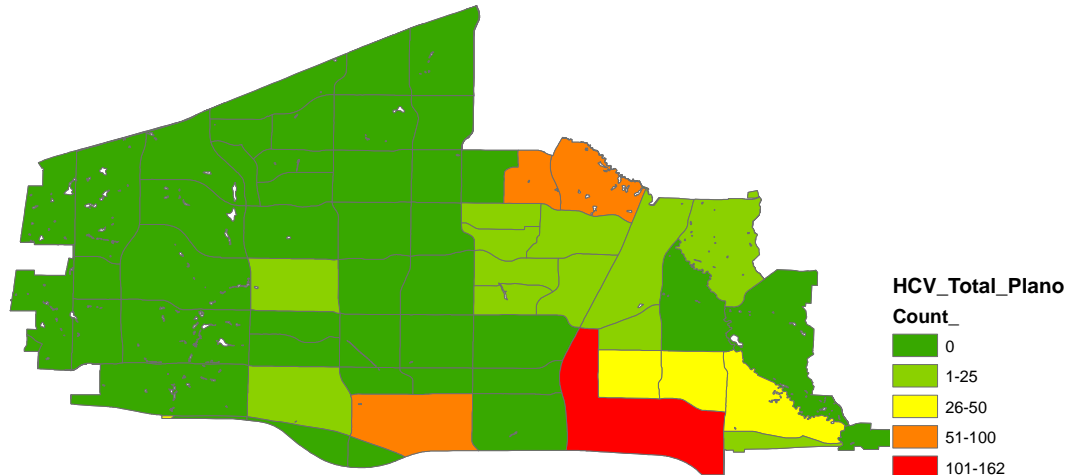


Figure 58: Location of all HCVs in Plano

Concentrations of HCVs in Plano are not consistently located in census tracts with higher poverty and racial and ethnic segregation. Most of the City of Plano meets the qualifications for Walker Voucher holders (high-opportunity area), according to ICP's website, with the exception of one census tract in southeast Plano (census tract 319.00) and one census tract in south central Plano where poverty rates and rates of segregation exceed the Walker standards (Inclusive Communities Project, 2013). Figure 59 displays the rates of poverty and racial segregation for each of the four census tracts with the highest number of HCVs from all sources within the City of Plano. All four census tracts meet the Walker criteria for low poverty or low percent of residents who are black. Census tract 319.00, with the highest number and percentage of vouchers, has the highest poverty rate and the highest percent of non-white residents.

Census Tract	Total HCVs All Sources 2017	Total Households ACS 2016	Percent Households with HCVs	Percent Black Residents 2016 ACS	Percent Below Poverty Rate 2016 ACS	Percent Non- white 2015 ACS
316.31	104	1,791	6.0%	17.3%	13.7%	45.6%
319.00	162	1,705	7.4%	15.0%	24.8%	77.7%
315.06	104	3,114	3.3%	13.3%	12.3%	45%
316.32	69	2,599	2.6%	10.3%	6.8%	42.9%
318.07	86	2,116	3.8%	2.9%	4.0%	21.0%

Figure 59: Demographics of census tracts with greatest number of HCVs

3. Contributing Factors of Segregation

Comments received during public participation events and consultations with stakeholders provide insight into some of the contributing factors of segregation in the City of Plano. The most frequent comments identified **community opposition** to rental housing and minority residents. Most of these comments cited historic racial prejudice and the challenges associated with living as a member of a racial minority in a predominantly white community. Walker Voucher holders (see 2.b. above) moving into low-minority communities report being stigmatized in their new communities and schools. Participants report a lack of social and personal supports in high-opportunity areas. Participants said that people tend to want to live in communities with access to their preferred places of worship and people who speak their language. Service providers observed that people preferred to live closer to affordable public transit or churches for help with food and other issues during times of need. City of Plano housing representatives commented that fewer nonprofit service providers were located in Plano than in other parts of the region, challenging efforts to increase social supports and use funding. An interview with a Walker Voucher holder, originally from south Dallas and living in Collin County, supported these observations. The voucher holder stated that she was unable to find congregations in which she felt comfortable close to her new home and returned to Dallas each week for church. She also said that she was often without her own reliable transportation and, without a support system to assist with rides, frequently found herself walking long distances with her children to shop and make appointments. This resident, living in the City of Allen, described problems at her apartment complex with poor management, crime and targeting of minority residents by police. She believed this was a result of the concentration of low-income residents at one property within the city.

Opposition to multifamily housing was an important topic during the 2017 Plano elections. An edition of Plano Podcast was dedicated to interviews with residents and community leaders in an edition entitled “Apartments” (Hooker & Jacobs, 2017). Some residents saw multifamily housing as a threat to Plano’s suburban character, quality of life and great schools. An organization called Plano Future became active during the development of the City’s Comprehensive Plan (2014 and following) and maintained its activity during the City elections in 2017 to oppose higher density residential developments (Plano Tomorrow Plan, 2014). The podcast explored both sides of the debate with David Smith (City Council member, 1993-1999) stating that, while some apartment developments were not well-designed (i.e. apartments at Preston and Plano Parkway), he no longer opposed high-density apartments and did not see them as a threat. City of Plano staff interviewed reported that the school population was declining with the aging population and that school performance was being maintained, countering contentions that multifamily housing degrades schools.

Participants in public engagement also observed **opposition on the part of landlords** to accepting Housing Choice Vouchers. Inclusive Communities Project conducted a survey of 1,901 multifamily properties from May 2015 through February 2017 in four counties, including 112 properties in Plano, to determine the availability of landlords willing to accept Section 8 vouchers. ICP found that only 12% of landlords overall would accept vouchers. Acceptance rates were lowest in communities with lower rates of minority residents. Ninety-six percent of landlords contacted in Plano refused to accept voucher holders. Figure 60 shows responses from the 148 Plano-area landlords surveyed in the ICP study by zip code. Only two landlords in 75093 and two in 75074 responded that they would accept vouchers. “Landlords refusing to negotiate with or rent to voucher holders causes the perpetuation of racial segregation by excluding a predominantly black voucher population from renting available multifamily units in white non-Hispanic census tracts.” (Inclusive Communities Project, 2017)

Zip Code	Yes	No	No Response
75013	0	1	0
75023	0	18	2
75024	0	24	9
75025	0	11	2
75074	2	17	13
75075	0	15	4
75093	2	23	5
Total	4	109	35

Figure 60: Landlord responses when asked whether they would accept Section 8 vouchers by zip code in Plano area (ICP 2017)

Rules and **policies that restrict the availability of rental properties** have an exclusionary effect on black and Hispanic residents (Pendall, 2000). Homeowners associations (HOAs) can pose a structural contributing factor to segregation by restricting the number of properties that can be rented (although they face prohibitions from approving individual renters) (Cagle, 2016). Twenty percent of Texas homes are included in HOAs but rates in Collin County are higher (Wall, 2012). Rental restrictions can be based on stereotypes that renters will not adequately maintain property (The Hignell Companies, 2013). Historic land use policies and practices that limit residential densities greater than eight units per acre limit the availability and affordability of rental housing and have been shown to exclude minority residents (Pendall, Local land use regulation and the chain of exclusion, 2000). Themes from the 2017 Plano City Council elections included opposition to high-density housing in the interest of preserving a “suburban way of life,” based on a review of campaign mailings. Plano’s Comprehensive Plan supports a “system of organized land use to provide greater housing and employment choices, where new and redevelopment areas *respect existing neighborhoods* and business” (City of Plano, 2018). The Douglass community with the highest rates of minority residents is characterized by smaller lot sizes while larger lots predominate on the west side of Plano in higher opportunity areas with lower rates of minority residents.

Public comments also identified the **effect of income** on housing choice. Many of the participants saw low minimum wages and low service worker wages contributing to segregation along with the lack of affordable housing in areas with low levels of segregation. A study by the Urban Institute finds that cities with higher racial and economic segregation also have lower rates of income for black residents and other negative community outcomes (Acs, Pendall, & Treskon, 2017).

Example comments from the appendix regarding contributing factors to segregation:

- Prejudice/racism; traditions – people continuing to follow old habits
- Difficulty of fighting against stereotypes and being the first one or the odd one out in a new neighborhood
- The need for minorities to band together for safety from persecution
- Prejudice seems to last forever!
- Minority children face stigma; teachers would make her [minority student] feel oppressed even though they [students and teachers] live in the same area and go to the same school.

- Home owners' associations set caps on the number of rental units permitted within their boundaries; HOAs have increased with recent development
- With limited income and little or no transportation, you tend to gravitate towards people you know for support base
- People didn't want to move away from their support system.

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

1. Analysis

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

HUD defines racially and ethnically concentrated areas of poverty (R/ECAP) as census tracts with 50% or more of the population classifying themselves as non-white and 40% or more of the population with incomes below the federal poverty level (adjusted for household size) (HUD, Office of Policy Development & Research, 2017). There are no census tracts that meet the criteria for R/ECAP in Plano as shown in Figure 61, based on US Census data.

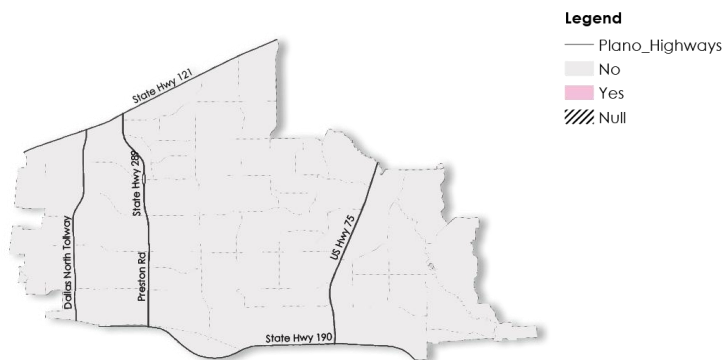


Figure 61: R/ECAPs Map of Plano in 2015, ACS 2015

Figure 62 displays R/ECAPS in the NTRHA region. R/ECAPs are primarily located in Fort Worth and Dallas, primarily concentrated in the southeast sectors of the cities. Smaller numbers of R/ECAPs are located in the mid-cities area between Fort Worth and Dallas and in Commerce and Ennis.

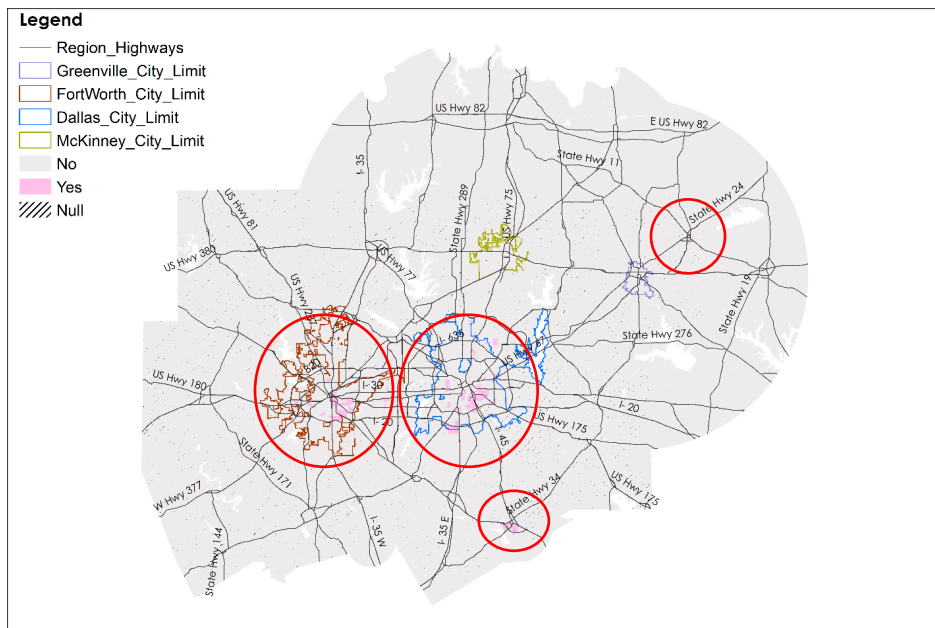


Figure 62: R/ECAPs Map of DFW Region in 2015, (ACS 2015)

b

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

Figure 63 shows the demographics of the R/ECAPs of the DFW region, including race, ethnicity, family type and national origin. The City of Plano has no census tracts that meet the criteria for R/ECAP. Figure 64 lists overall demographic information for Plano and for the region for comparison purposes. Hispanic and black residents account for over 84% of regional R/ECAP residents with Hispanics accounting for over 47%. Hispanic and black residents in the region account for only 41% of residents in all census tracts. Over 56% of R/ECAP households have children as opposed to 51% overall in the region. Immigrants from Mexico cluster in R/ECAPs and represent over 20% of R/ECAP residents while regionally, Mexican immigrants total less than 10% of the population.

	(Plano, TX CDBG, HOME) Jurisdiction		(Dallas-Fort Worth-Arlington, TX) Region	
R/ECAP Race/Ethnicity	#	%	#	%
Total Population in R/ECAPs	0	-	261,237	-
White, Non-Hispanic	0	N/a	29,968	11.47%
Black, Non-Hispanic	0	N/a	96,808	37.06%
Hispanic	0	N/a	123,073	47.11%
Asian or Pacific Islander, Non-Hispanic	0	N/a	7,540	2.89%
Native American, Non-Hispanic	0	N/a	697	0.27%
Other, Non-Hispanic	0	N/a	366	0.14%
R/ECAP Family Type				
Total Families in R/ECAPs	0	-	54,898	-
Families with children	0	N/a	31,104	56.66%
R/ECAP National Origin				
Total Population in R/ECAPs	0	-	261,237	-
#1 country of origin	Null	0 0.00%	Mexico	53,509 20.48%
#2 country of origin	Null	0 0.00%	El Salvador	2,790 1.07%
#3 country of origin	Null	0 0.00%	Honduras	2,019 0.77%
#4 country of origin	Null	0 0.00%	Vietnam	1,428 0.55%
#5 country of origin	Null	0 0.00%	India	1,339 0.51%
#6 country of origin	Null	0 0.00%	Other South Central Asia	888 0.34%
#7 country of origin	Null	0 0.00%	Guatemala	869 0.33%
#8 country of origin	Null	0 0.00%	Other Eastern Africa	704 0.27%
#9 country of origin	Null	0 0.00%	Nigeria	466 0.18%
#10 country of origin	Null	0 0.00%	Ethiopia	464 0.18%

Figure 63: Demographics of R/ECAPs in Plano and the DFW region, (HUD AFH Table 4, ACS 2013)

	(Plano, TX CDBG, HOME) Jurisdiction		(Dallas-Fort Worth-Arlington, TX) Region	
Race/Ethnicity	#	%	#	%
White, Non-Hispanic	152,712	58.77%	3,248,508	50.55%
Black, Non-Hispanic	19,175	7.38%	941,599	14.65%
Hispanic	37,967	14.61%	1,758,738	27.37%
Asian or Pacific Islander, Non-Hispanic	42,886	16.50%	343,585	5.35%
Native American, Non-Hispanic	836	0.32%	25,032	0.39%
Two or More Races, Non-Hispanic	5,811	2.24%	99,655	1.55%
Other, Non-Hispanic	453	0.17%	9,096	0.14%
National Origin				
#1 country of origin	India	12,167 4.87%	Mexico	595,184 9.79%
#2 country of origin	Mexico	10,737 4.30%	India	71,353 1.17%
#3 country of origin	China excl. Hong Kong & Taiwan	5,908 2.36%	Vietnam	54,487 0.90%
#4 country of origin	Taiwan	2,667 1.07%	El Salvador	47,606 0.78%
#5 country of origin	Korea	2,335 0.93%	Korea	23,911 0.39%
#6 country of origin	Vietnam	2,199 0.88%	China excl. Hong Kong & Taiwan	21,735 0.36%
#7 country of origin	Iran	2,110 0.84%	Philippines	19,858 0.33%
#8 country of origin	Pakistan	1,995 0.80%	Honduras	18,244 0.30%
#9 country of origin	Philippines	1,551 0.62%	Nigeria	14,288 0.24%
#10 country of origin	El Salvador	1,379 0.55%	Guatemala	13,759 0.23%
Limited English Proficiency (LEP) Language				
#1 LEP Language	Spanish	12,375 4.95%	Spanish	645,031 10.61%
#2 LEP Language	Chinese	5,429 2.17%	Vietnamese	39,230 0.65%
#3 LEP Language	Vietnamese	1,619 0.65%	Chinese	20,984 0.35%
#4 LEP Language	Other Asian Language	1,361 0.54%	Korean	14,821 0.24%
#5 LEP Language	Korean	1,285 0.51%	Other Asian Language	10,271 0.17%
#6 LEP Language	Hindi	1,090 0.44%	African	9,730 0.16%
#7 LEP Language	Persian	1,023 0.41%	Other Indic Language	8,696 0.14%
#8 LEP Language	Urdu	771 0.31%	Arabic	6,765 0.11%
#9 LEP Language	Other Indic Language	758 0.30%	Urdu	4,613 0.08%
#10 LEP Language	Japanese	536 0.21%	Hindi	4,321 0.07%
Disability Type				
Hearing difficulty	4,749	1.91%	159,591	2.65%
Vision difficulty	2,404	0.96%	115,061	1.91%
Cognitive difficulty	5,864	2.35%	226,638	3.76%
Ambulatory difficulty	8,420	3.38%	316,777	5.26%
Self-care difficulty	3,857	1.55%	122,242	2.03%
Independent living difficulty	6,379	2.56%	204,582	3.40%
Sex				
Male	127,218	48.96%	3,168,434	49.30%
Female	132,623	51.04%	3,257,780	50.70%
Age				
Under 18	66,932	25.76%	1,785,825	27.79%
18-64	170,241	65.52%	4,068,790	63.32%
65+	22,669	8.72%	571,599	8.89%
Family Type				
Families with children	35,405	51.09%	822,439	51.21%

Figure 64: Demographics of Plano and the DFW region, 2013

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

For the region in 1990, R/ECAPs are mostly located in southeast Dallas and southeast Fort Worth as shown in Figure 66. Smaller clusters are also located just north of I-30 in Greenville. In 2000, according to Figure 69, R/ECAPs are centered in Dallas with minor R/ECAPs developing along I-30 west of Dallas. R/ECAPs in Fort Worth increase but are still located primarily in southeast Fort Worth with the addition of the Lake Como area in west Fort Worth. In 2010, R/ECAPs in southeast Dallas have stretched along I-45 to I-20 (Figure 72). Several clusters have also appeared outside Dallas along I-635 and reappeared in the Greenville area. R/ECAPs in Fort Worth decreased with the greatest concentration continuing in southeast Fort Worth. The 2013 R/ECAP map of the region (Figure 75), shows slightly fewer R/ECAPs in the center of Dallas and significantly more R/ECAPs in Fort Worth. R/ECAPs in Fort Worth added census tracts in south, southwest, and far-east Fort Worth. In 2015, Figure 78, R/ECAPS are found in similar places around Dallas and Fort Worth as in 2013. However, there are new clusters located inside Commerce and Ennis. They are surrounded by Caddo Street, Charity Road, US 50 and Church Street, and by Laneview Drive, West Ennis Avenue, Knighthurst Street and Liska Road, respectively.



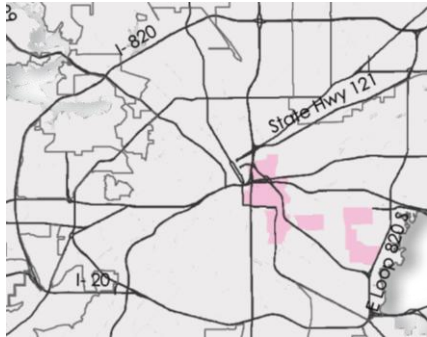


Figure 67: Fort Worth R/ECAPs, 1990

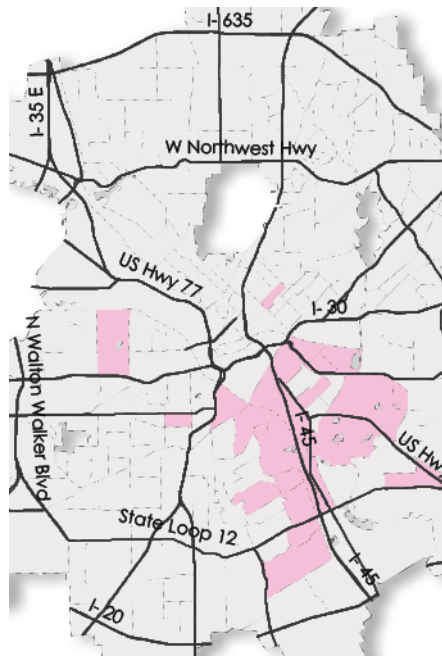


Figure 68: Dallas R/ECAPs, 1990

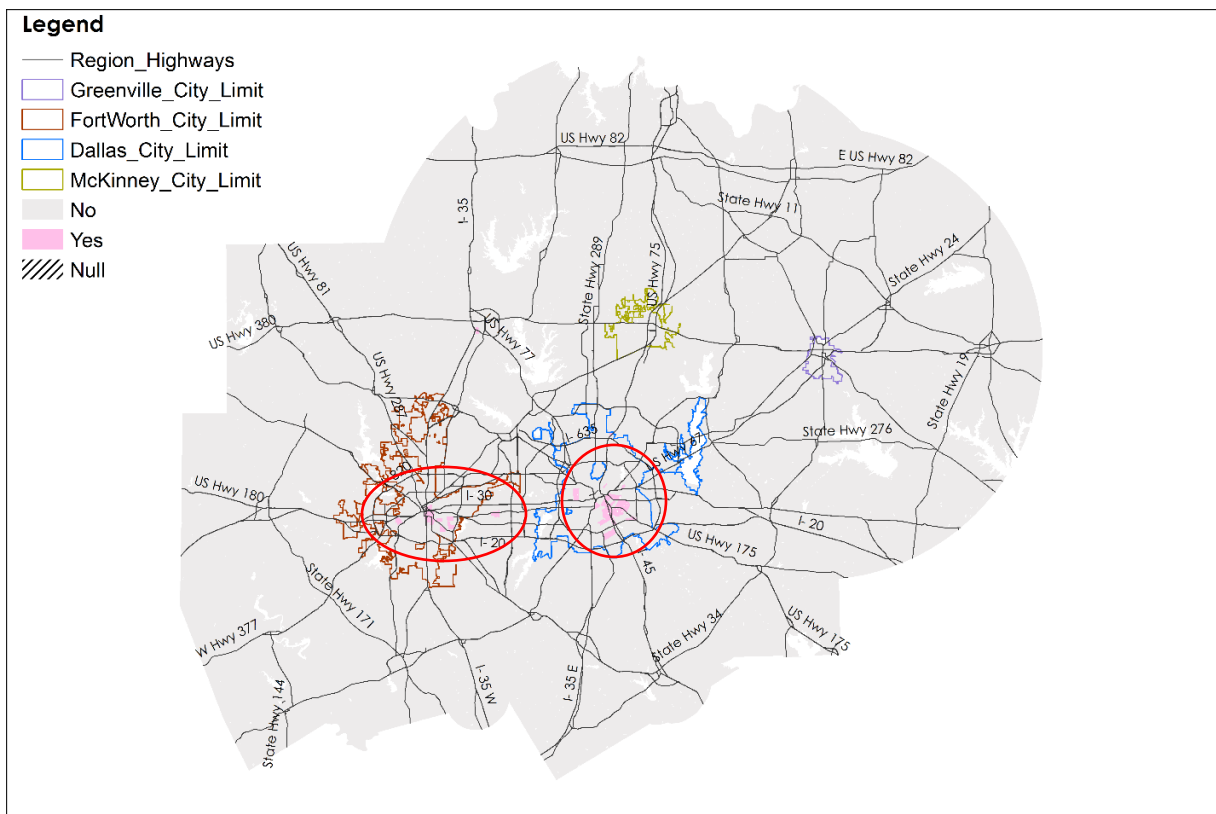


Figure 69: R/ECAPs Map of NTRHA Region in 2000, (HUD, US Decennial Census 2000)

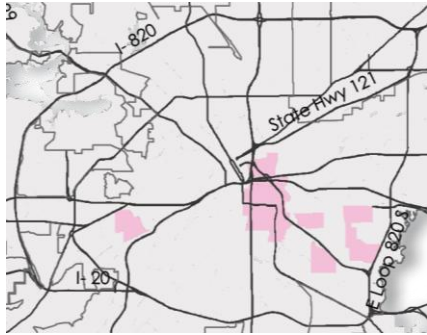


Figure 70: Fort Worth R/ECAPs, 2000

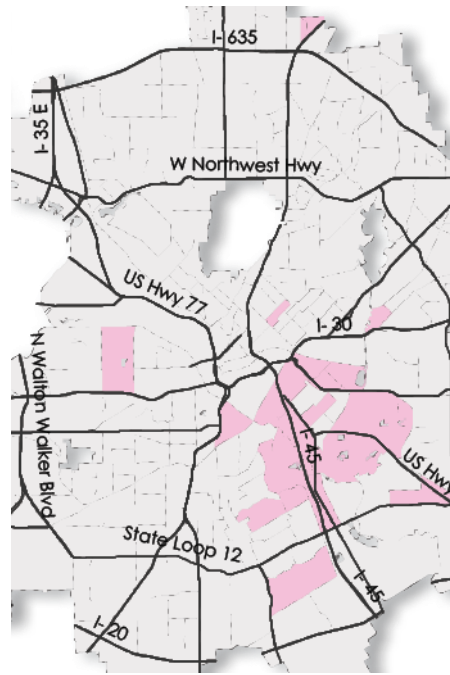


Figure 71: Dallas R/ECAPs, 2000

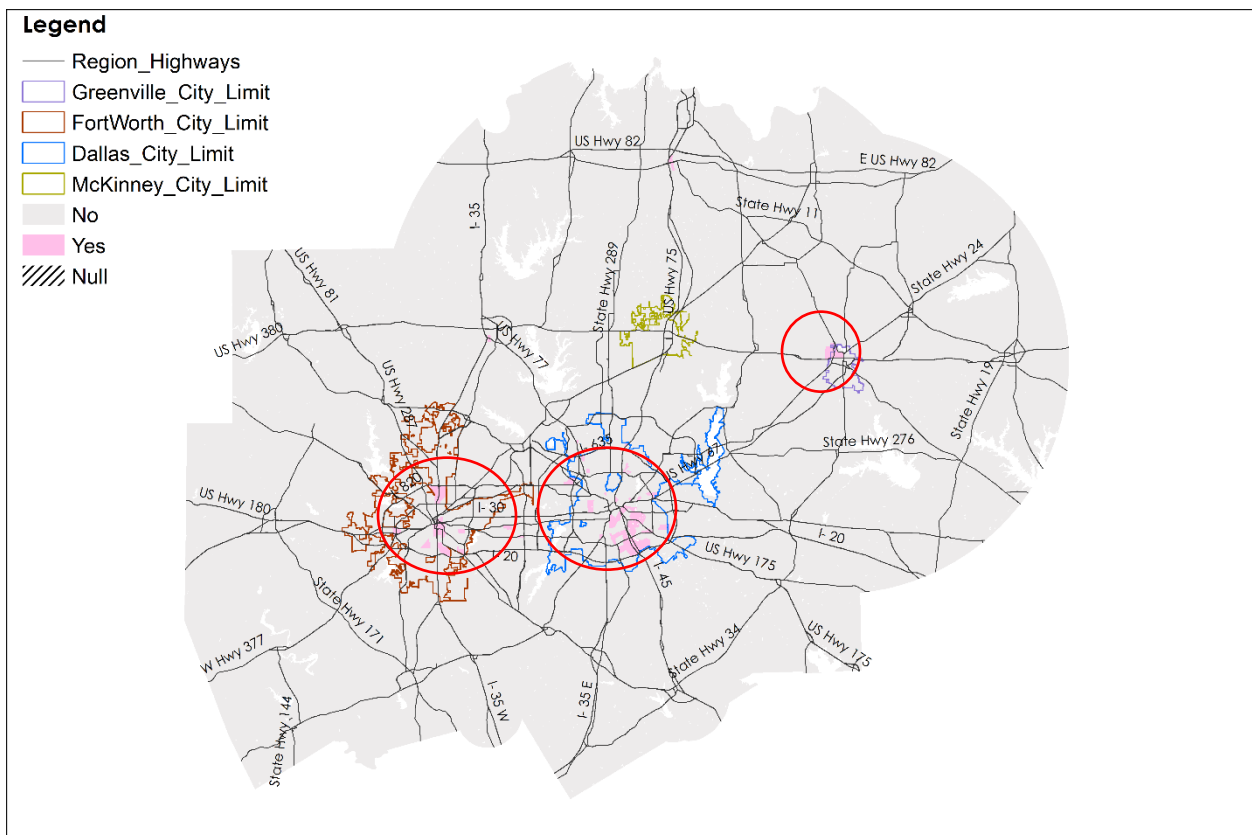


Figure 72: R/ECAPs Map of NTRHA Region in 2010 (HUD, 2010 Decennial Census)

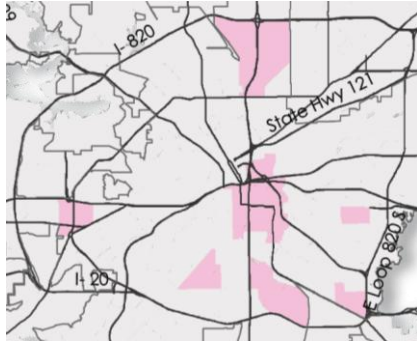


Figure 73: Fort Worth R/ECAPs, 2010

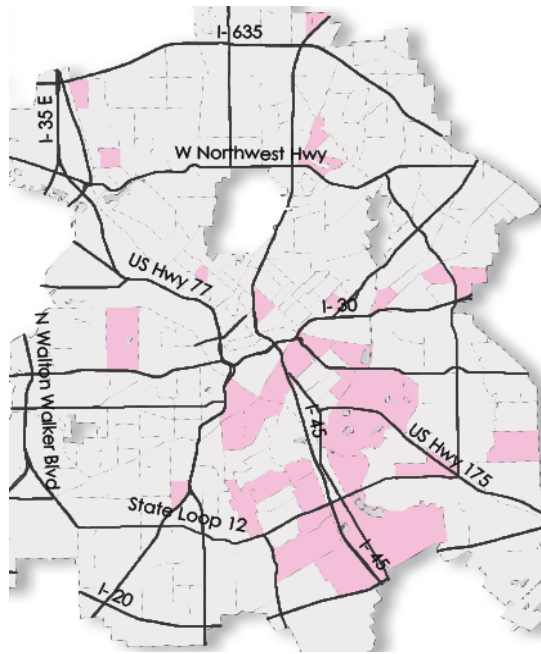


Figure 74: Dallas R/ECAPs, 2010

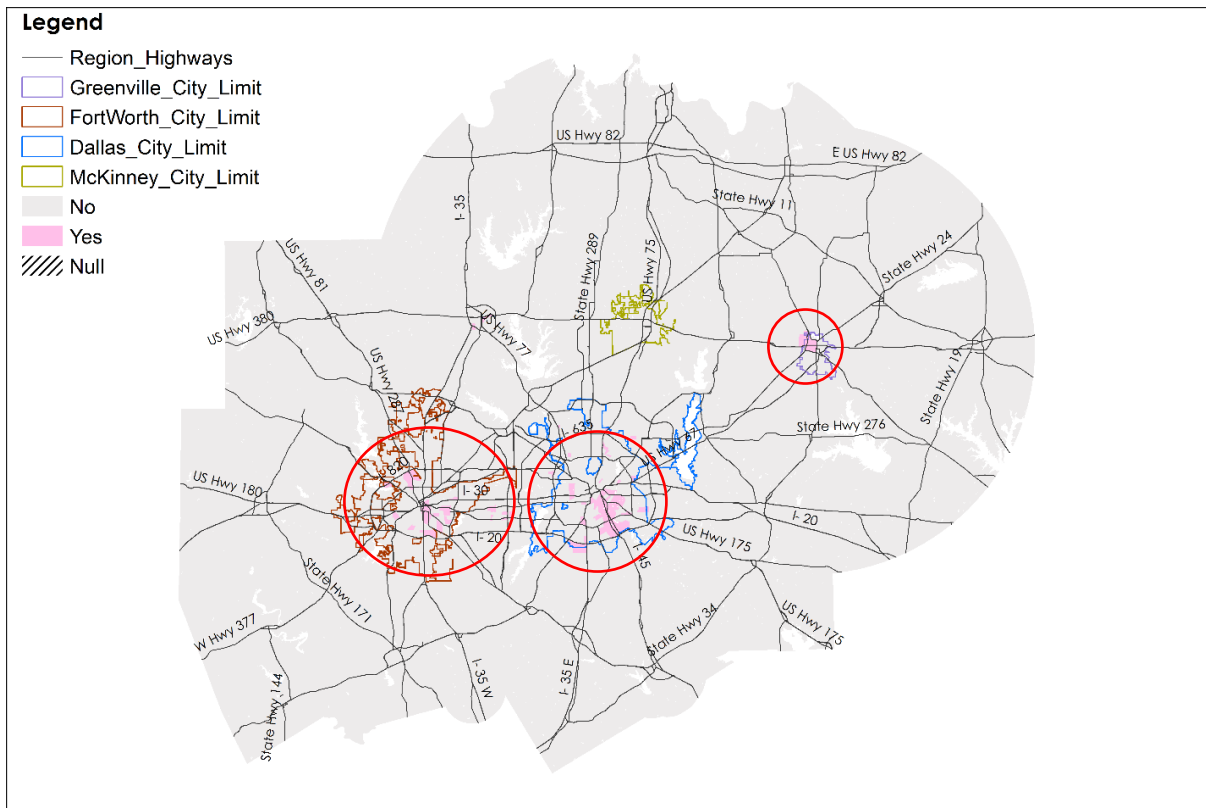


Figure 75: R/ECAPs Map of DFW Region in 2013 (HUD, ACS 2013)

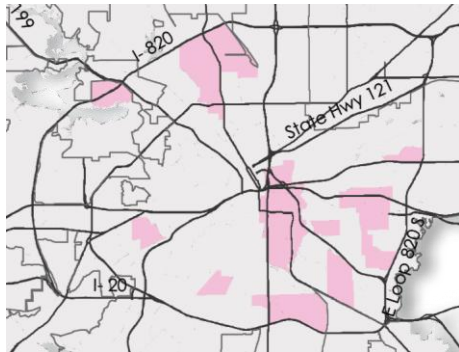


Figure 76: Fort Worth R/ECAPs, 2013

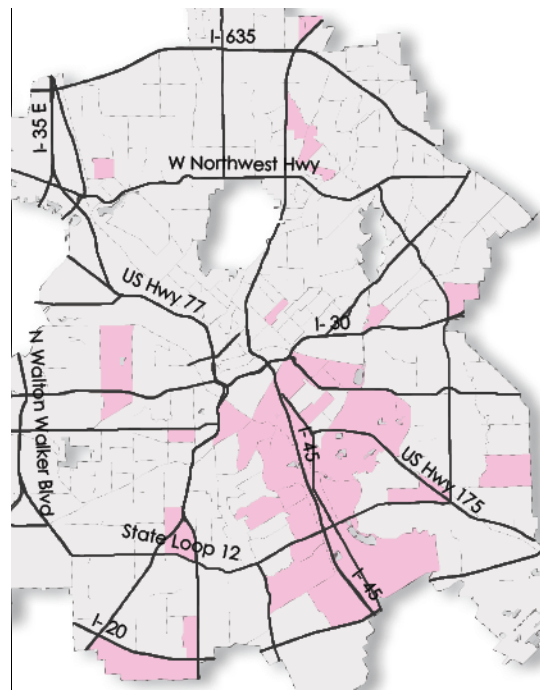


Figure 77: Dallas R/ECAPs, 2013

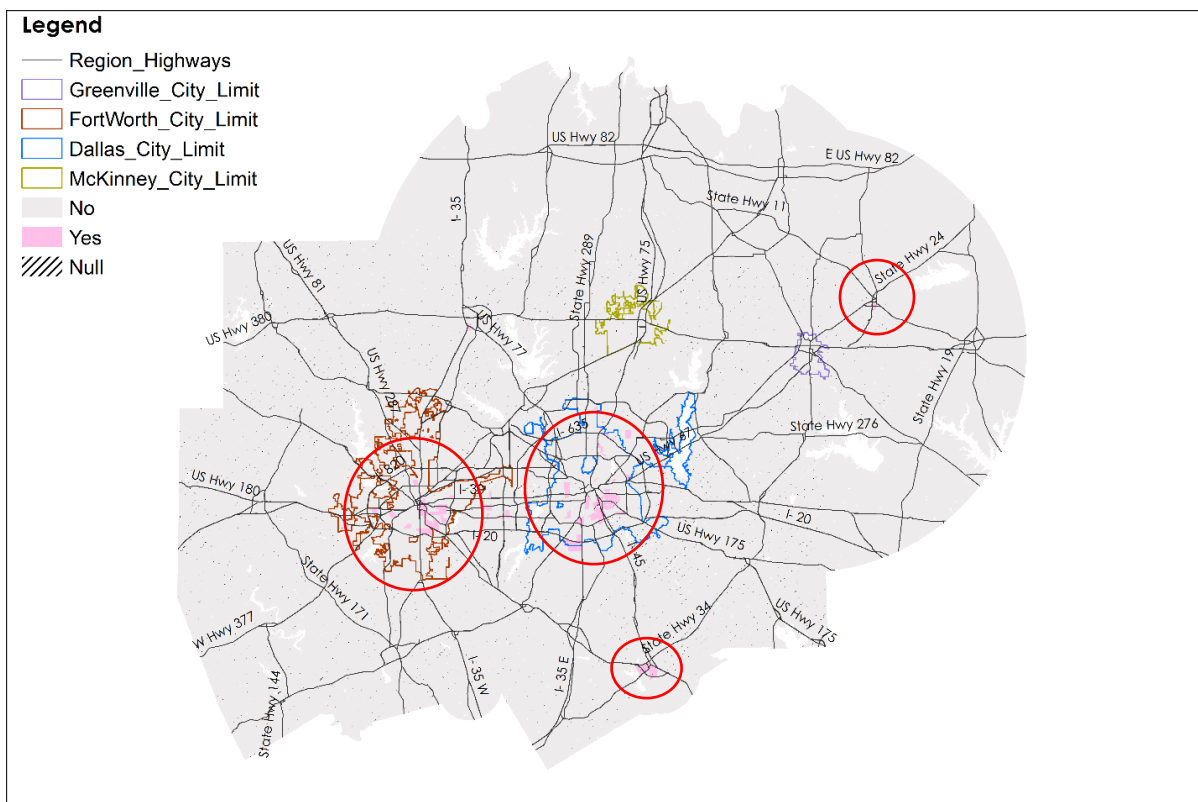


Figure 78: R/ECAPs Map of NTRHA region in (ACS, 2015)

2. Additional Information

a

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

There are no census tracts within the City of Plano that meet the HUD definitions for R/ECAP. However, 25% of Plano's census tracts are majority non-white (from 50% to 78%), according to 2015 ACS data. These census tracts are clustered in northwest Plano (34% to 56% Asian or Pacific Islander), southeast Plano (29% to 53% Hispanic) and east Plano (17% to 21% black). Plano also has three census tracts with over 50% non-white and over 20% of residents with incomes below the federal poverty level. These census tracts are clustered in southeast Plano with high rates of Hispanic residents and could be described as emerging R/ECAPs. Figure 79 shows poverty, race and ethnicity information for each of these census tracts.

Census Tract	% Non-white	% Poverty	% White	% Black	% Asian	% Hispanic	Location
320.03	70%	28%	30%	14%	2%	44%	East
319	78%	27%	22%	12%	2%	49%	East
320.12	69%	22%	31%	9%	5%	53%	East

Figure 79: Plano census tracts with over 50% non-white and over 20% poverty

b

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

In 1999, the City of Plano established a Tax Increment Financing District to increase economic development and revitalize its historic downtown (City of Plano, 2014). The TIF is located in southeast Plano and includes one of Plano's lower income communities. In 2014, the term of the TIF was extended for an additional 15 years. The TIF is expected to generate \$68 million in tax revenues for use in development projects over its 30-year life (taxes produced in excess of the original base year property taxes).

Figure 80 displays the boundaries of the TIF. The TIF includes the entire historic Douglass neighborhood. Most of the projects provide for street, sidewalk and utility improvements, environmental hazard abatements, lighting and streetscape that will support commercial development and public infrastructure and uses (e.g., Courtyard Theater, Cox Building, Plano Independent School District Service Center, Police Parking Garage, Mendenhall Elementary School Reconstruction and Parker Road DART Station Infill). Four of the 29 projects (13%) have the purpose of supporting residential development:

- Southern Land Company – three acres for multifamily dwellings and commercial space, 15th Street and I Avenue
- 15th Street Village Redevelopment – residential development, 15th Street and G Avenue
- Municipal Center South Redevelopment – mixed-use development, 14th Street and K Avenue
- 13th/14th Street Connector Area Redevelopment – residential development northwest of Connector and G Ave.

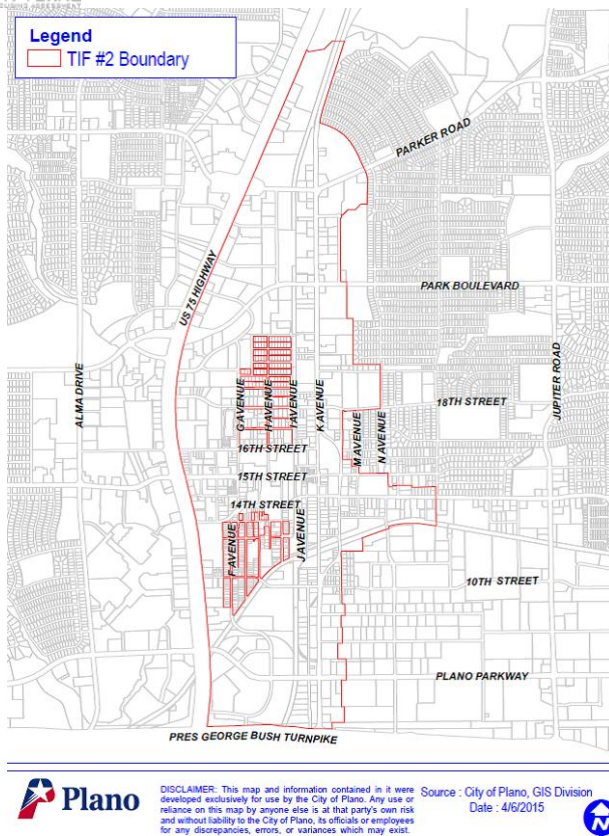


Figure 80: Boundaries of Plano TIF zone

Figure 81 displays the boundaries of the City of Plano Neighborhood Empowerment Zone (NEZ) Number One, which includes the Douglass community (City of Plano, 2011). Residential and commercial projects, including new and existing development within the NEZ boundaries, may apply for fee waivers in support of the following goals:

- Promote the creation and rehabilitation of affordable housing.
- Promote an increase in economic development and an increase in the quality of social services and public safety.
- Increase the public health, safety and welfare of the citizens of Plano.

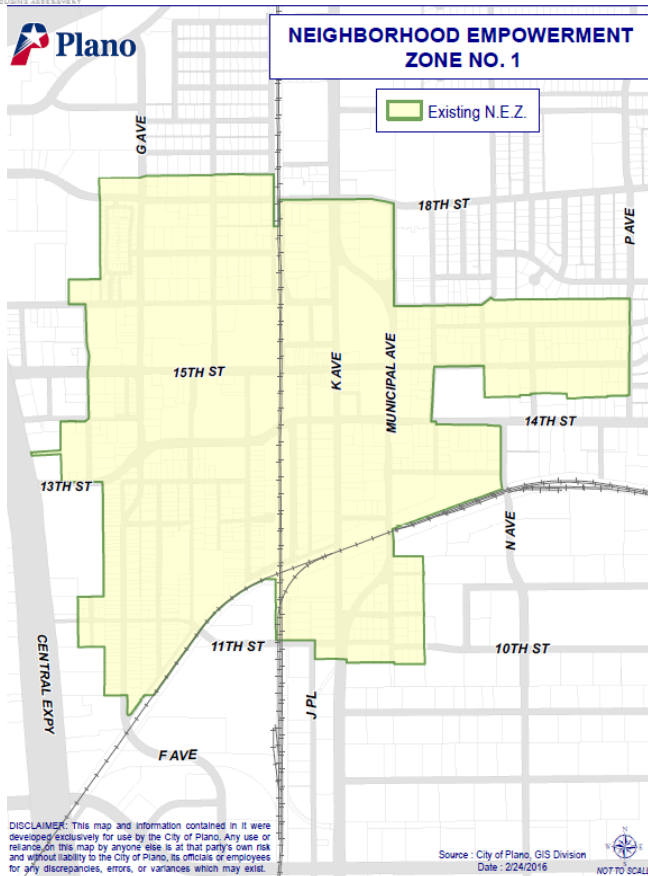


Figure 81: Plano Neighborhood Empowerment Zone boundaries

The City of Plano uses a Neighborhood Enhancement Tool (NET) to “measure the condition of Plano neighborhoods, determine the impact city efforts have on neighborhood conditions, show a correlation between city program efforts and neighborhood conditions and help city staff become more strategic with regards to program implementation” (City of Plano, 2010). NET is used to target prospective neighborhoods for the Love Where You Live program. NET criteria include a) rental property percentage, b) Property Standards-PS (Code) active cases closed as non-voluntary complaint, c) properties with three or more PS cases, d) property crimes, e) drug related crimes, f) violent crimes (Eaden, 2017).

The City of Plano’s Concerted Revitalization Plan addresses the area displayed in Figure 82. The area includes the NEZ and TIF program boundaries and addresses part of the lowest income area of Plano. The plan focuses on revitalization of Plano’s historic downtown and is composed of the City’s Five Year Consolidated Plan for use of HUD funding and the Downtown Plano Vision and Strategy Plan (City of Plano, 2017). The plan area surrounds a portion of the DART Red Line Rail Corridor providing access to regional public transit. Fifty percent of households in the plan area have annual incomes below 80% of area median income, making the area eligible for HUD funding. The plan includes:

- Establishing more variety of uses that includes mixed housing options, public services and facilities, office, restaurant, retail, personal services and general apparel and household goods stores.
- Preserving neighborhoods through rehabilitation (restoration) and new construction of mixed-income housing types.

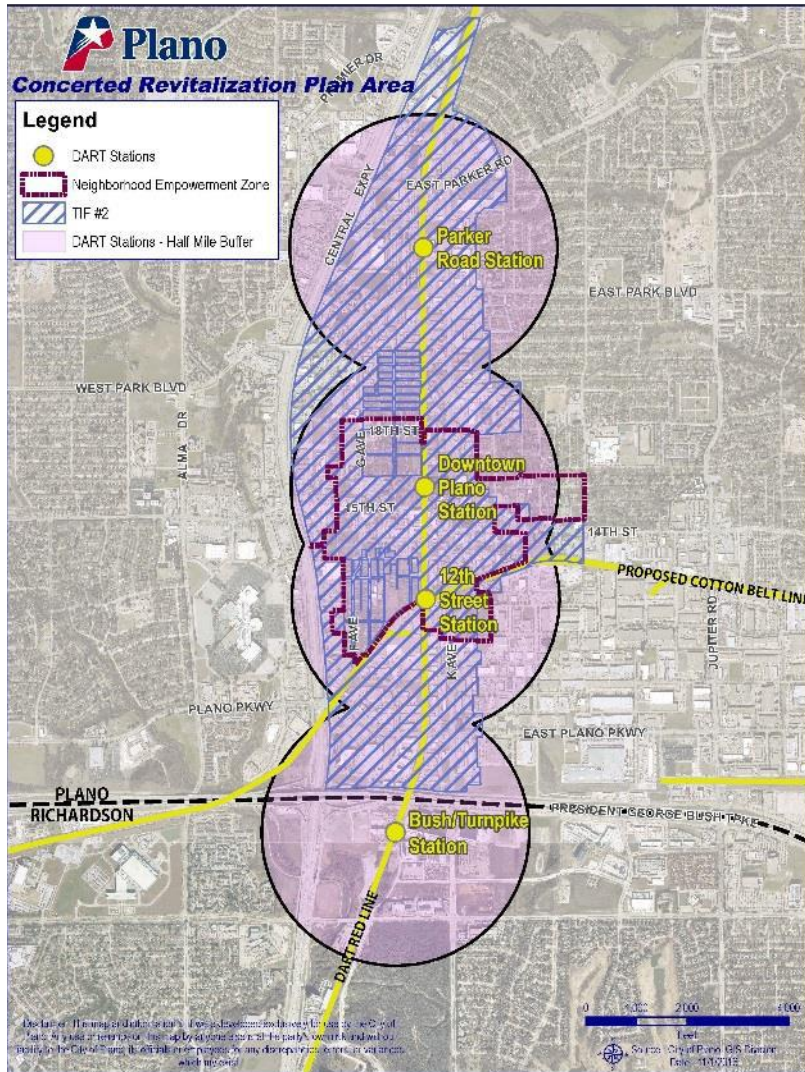


Figure 82: Plano Concerted Revitalization Plan area

The Concerted Revitalization Plan is funded by TIF, NEZ, CDBG, HOME and City general funds and supports the development and rehabilitation of 1,000 affordable housing units within half a mile of the transit corridor and 1,000 housing units with a variety of housing types in the downtown area. Most units built since January 2017 are rental properties (City of Plano, 2017). The southern end of the plan area is adjacent to job opportunities in Richardson and major corporate employers, multifamily housing and undeveloped land.

Figure 83 displays four low-income communities with older housing stock located within the plan area targeted for neighborhood preservation activities, including organization and support of residents. The plan encourages inclusive design for ground-floor housing units and a variety of housing types and price points.

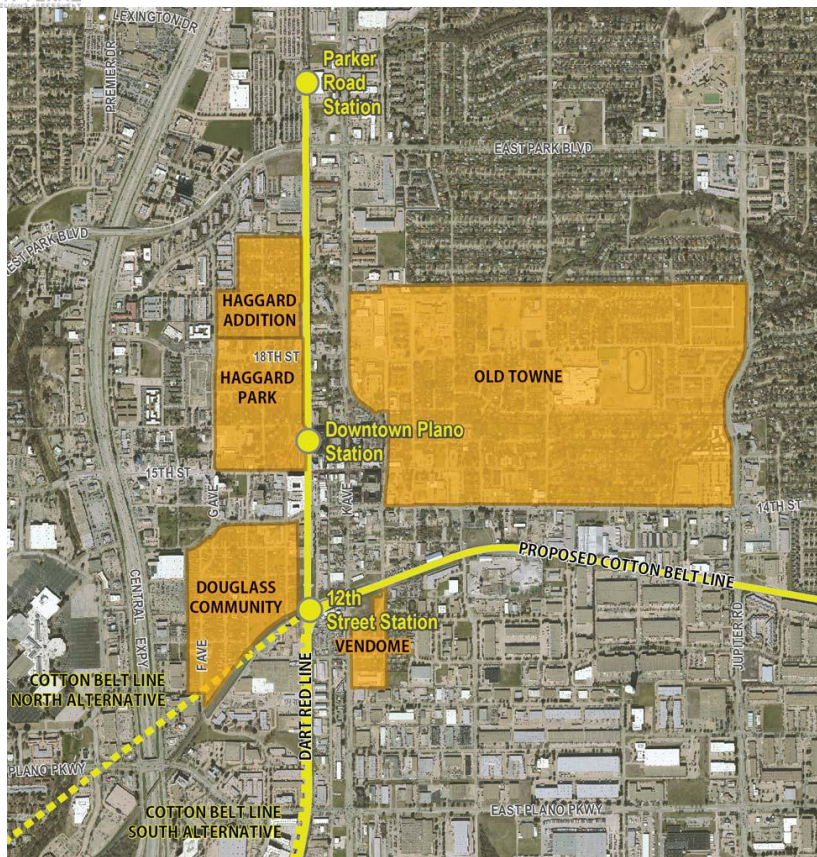


Figure 83: Low-income neighborhoods in the Concerted Revitalization Plan area

The governor of Texas has declared census tract 320.13 in east Plano, pictured in Figure 84, as an Opportunity Zone for the purposes of receiving investment benefits created by the federal Tax Cuts and Jobs Act of 2017 (State of Texas, 2018). Investments in this census tract will be eligible for deferred capital gains tax in a broad range of categories, including affordable housing, infrastructure, commercial and industrial real estate and businesses (Theodos, Hedman, Meixell, & Hangen, 2018). This census tract is just north of the Concerted Revitalization Plan area and Parker Road Station.

Theodos, et al. (2018) have developed an index to measure inflows of capital into a census tract along with an index for possible gentrification based on increasing trends in socioeconomic variables such as percent of residents with degrees and median income. The capital index ranges from a high of 10 for census tracts with the most capital investment of many different types to a low of 1. Census tracts in Collin County range from a low score of 6 to a high of 10 indicating higher capital investments than most U.S. communities. Census tract 320.13 receives a score of 8, prior to any effect of the Opportunity Zone designation.

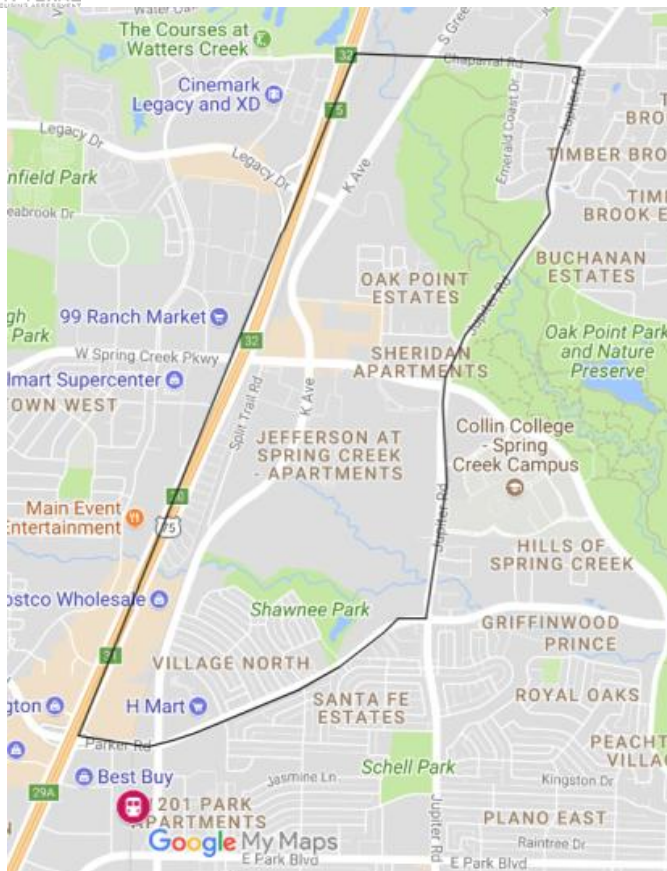


Figure 84: Collin County's Opportunity Zone, census tract 320.13

Community Reinvestment Act

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

Figure 85 shows the total value of the CRA loans made to small businesses by institutions in Collin County categorized by the median family income of the business applicant's census tract. Columns two through four categorize the total amount loaned by the size of the loan. Column five shows the amount of money loaned to small businesses (revenue less than or equal to \$1 million). Seventy percent of Collin County CRA dollars loaned went to businesses located in

census tracts where family incomes are greater than 120% of the area median income for the DFW MSA⁵. Fewer dollars were loaned to lower income communities. Fewer CRA dollars going to lower income census tracts disproportionately impacts minority residents who are more likely to live in census tracts with lower median incomes.

Community	Loan Amount at Origination			Loans to Businesses with Gross Annual Revenues ≤ \$1 Million	TOTAL	TOTAL
	≤ \$100,000	> \$100,000 But ≤ \$250,000	> \$250,000		Dollars loaned	% of Dollars loaned
COLLIN COUNTY	(000s)	(000s)	(000s)	(000s)	(000s)	(000s)
30-40%	\$616	\$118	\$0	\$199	\$933	0.1%
50-60%	\$4,205	\$3,374	\$13,909	\$8,750	\$30,238	2.6%
60-70%	\$23,672	\$10,846	\$29,535	\$19,609	\$83,662	7.3%
70-80%	\$6,753	\$3,579	\$11,794	\$9,770	\$31,896	2.8%
80-90%	\$11,900	\$8,751	\$27,623	\$13,226	\$61,500	5.4%
90-100%	\$9,490	\$2,312	\$9,400	\$8,589	\$29,791	2.6%
100-110%	\$13,037	\$5,648	\$10,315	\$12,408	\$41,408	3.6%
110-120%	\$14,723	\$5,229	\$16,170	\$16,152	\$52,274	4.6%
≥ 120%	\$248,807	\$72,411	\$235,659	\$247,242	\$804,119	70.4%
Tract Not Known	\$3,755	\$200	\$750	\$1,938	\$6,643	0.6%
	\$336,958	\$112,468	\$355,155	\$337,883	\$1,142,464	

Figure 85: CRA loans by median family income of community 2016, Collin County

Loan originations: minorities and segregation

A recent review of mortgage originations finds no evidence of disproportionate loan approval rates for minority applicants in the Dallas-Fort Worth metropolitan area (Glantz & Martinez, 2018).

Figure 86 displays the percent of home mortgages approved, by race, for Collin County and the region (Federal Financial Institutions Examination Council, 2016). Rates of approval are approximately five percentage points lower for non-white applicants than white and Asian applicants, but the differences may not be statistically significant.

Race/Ethnicity	% Approved Collin County	% Approved Region
Asian	95.58%	94.40%
White	94.54%	93.30%
Not Hispanic	93.17%	93.42%
Pacific Islander	92.08%	90.35%
Native American	91.76%	89.17%
Black	90.50%	89.12%
Hispanic	89.14%	89.18%

Figure 86: Percent of mortgages approved by race/ethnicity, HMDA data 2017

Home mortgage loan originations reveal a spatial pattern in the Dallas-Fort Worth metropolitan area in some reports. A recent review of mortgage originations finds no evidence of a disproportionate loan approval rate for minority applicants in the Dallas Fort Worth metropolitan area (Glantz & Martinez, 2018) However, a review of the Urban Institute's interactive map of Home Mortgage Disclosure Act data for the Plano area finds no originations for Black households in 2016 and approximately 20 originations in 2015 (Bai, Ganesh, & Williams, 2017). This

⁵ No loans were recorded in Collin County in census tracts with median family incomes below 30% of area median income or between 40% and 50% of area median income.

activity, shown in Figure 87 represents a small fraction of the activity for white households. According to the interactive map, loan originations for Black households in the Dallas Fort Worth metropolitan area tend to concentrate south of Dallas, Arlington and Fort Worth, particularly south of I-20. Mortgage originations for minority borrowers peaked just before the great recession and have declined more severely than for white borrowers with the post-recession tightening of credit requirements. Minority borrowers, disproportionately represented in the group of borrowers with FICO scores below 660, have been far less able to benefit from the recovery and build wealth through home ownership (Goodman, Zhu, & George, 2015).

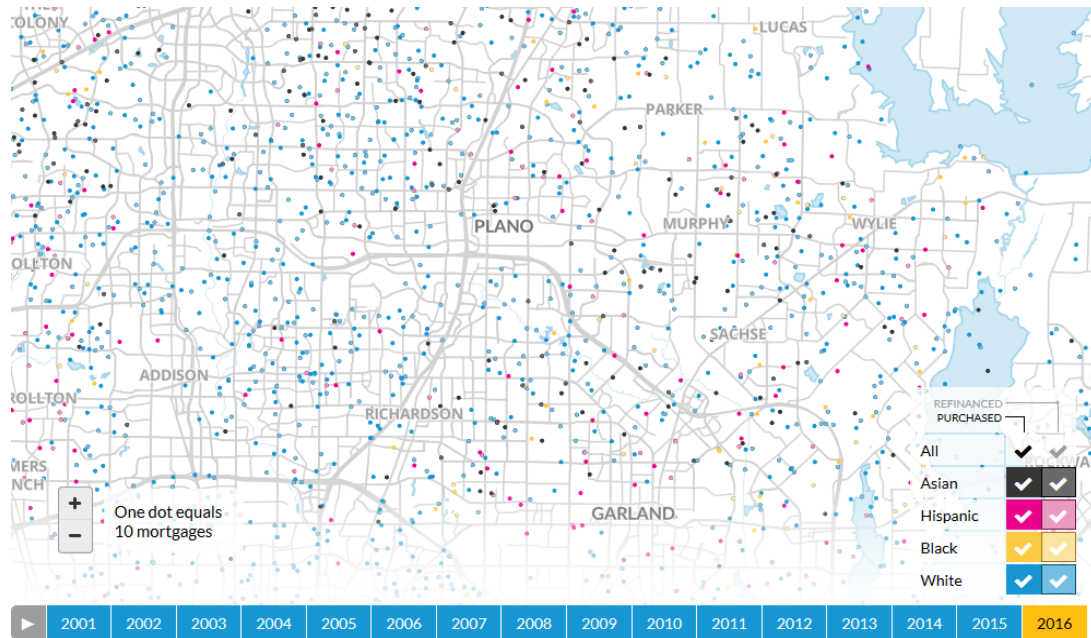


Figure 87: 2016 mortgage originations by race/ethnicity

Home mortgage loan denials are analyzed by reason (for the denial) for the DFW MSA in Figure 88 and for Collin County in Figure 89 (Federal Financial Institutions Examination Council, 2016). Debt-to-income ratio and poor credit history are the top two reasons for denial for every racial classification in both the region and Collin County. Credit history and debt-to-income ratio account for an average of 27% and 28% of denials respectively. Debt-to-income ratio is the number one reason in all race categories in Collin County, accounting for 32% of denials. Twenty-one percent of applications are denied on the basis of credit history in Collin County. Loan amounts may be higher in Collin County due to higher home prices than in the region, possibly contributing to more denials for higher debt-to-income ratios. Higher median income in Collin County than in the region could account for lower denials for poor credit history.

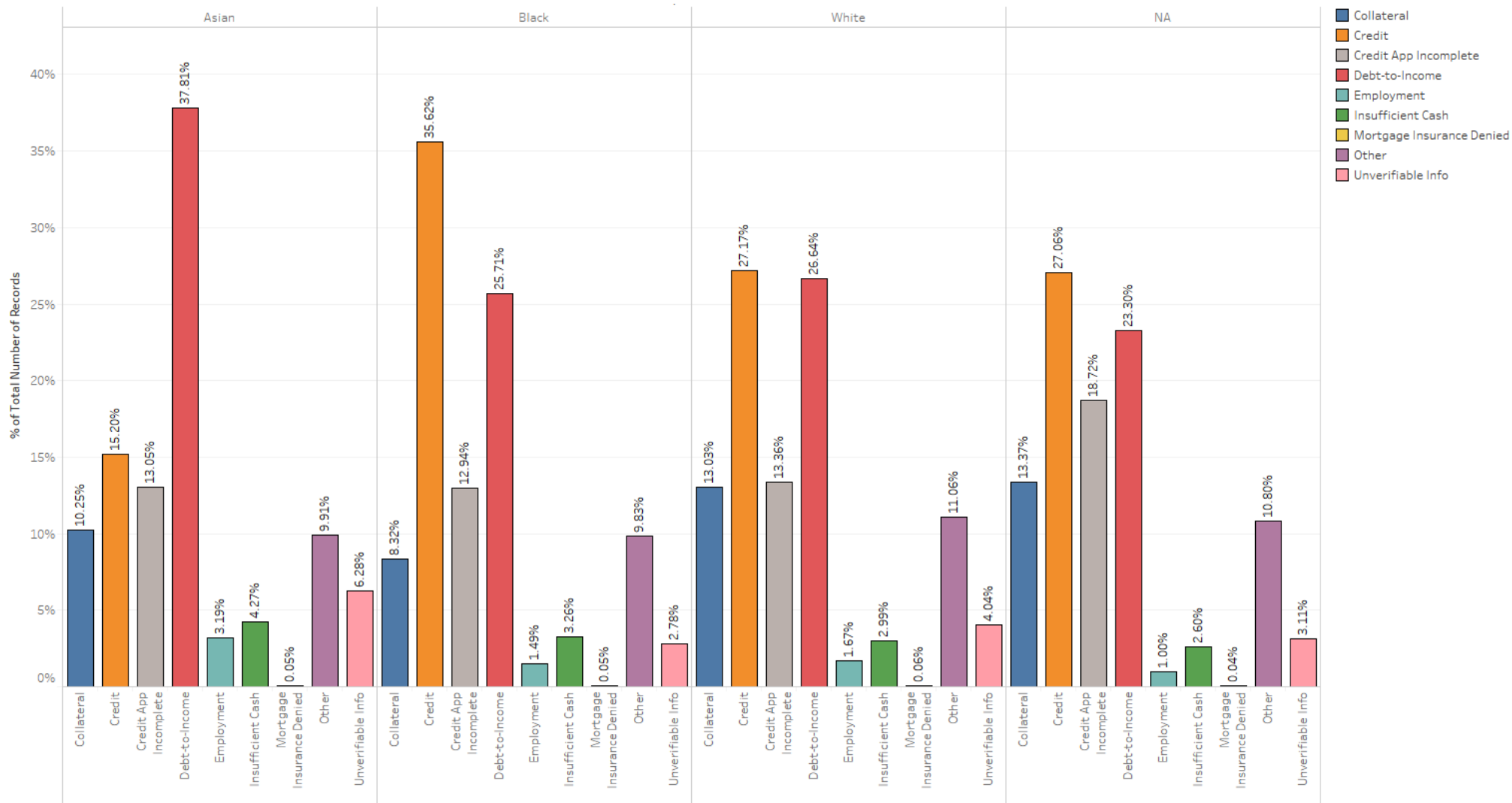


Figure 88: Reasons for denial of home mortgage loan applications, DFW MSA (FFIEC 2016)

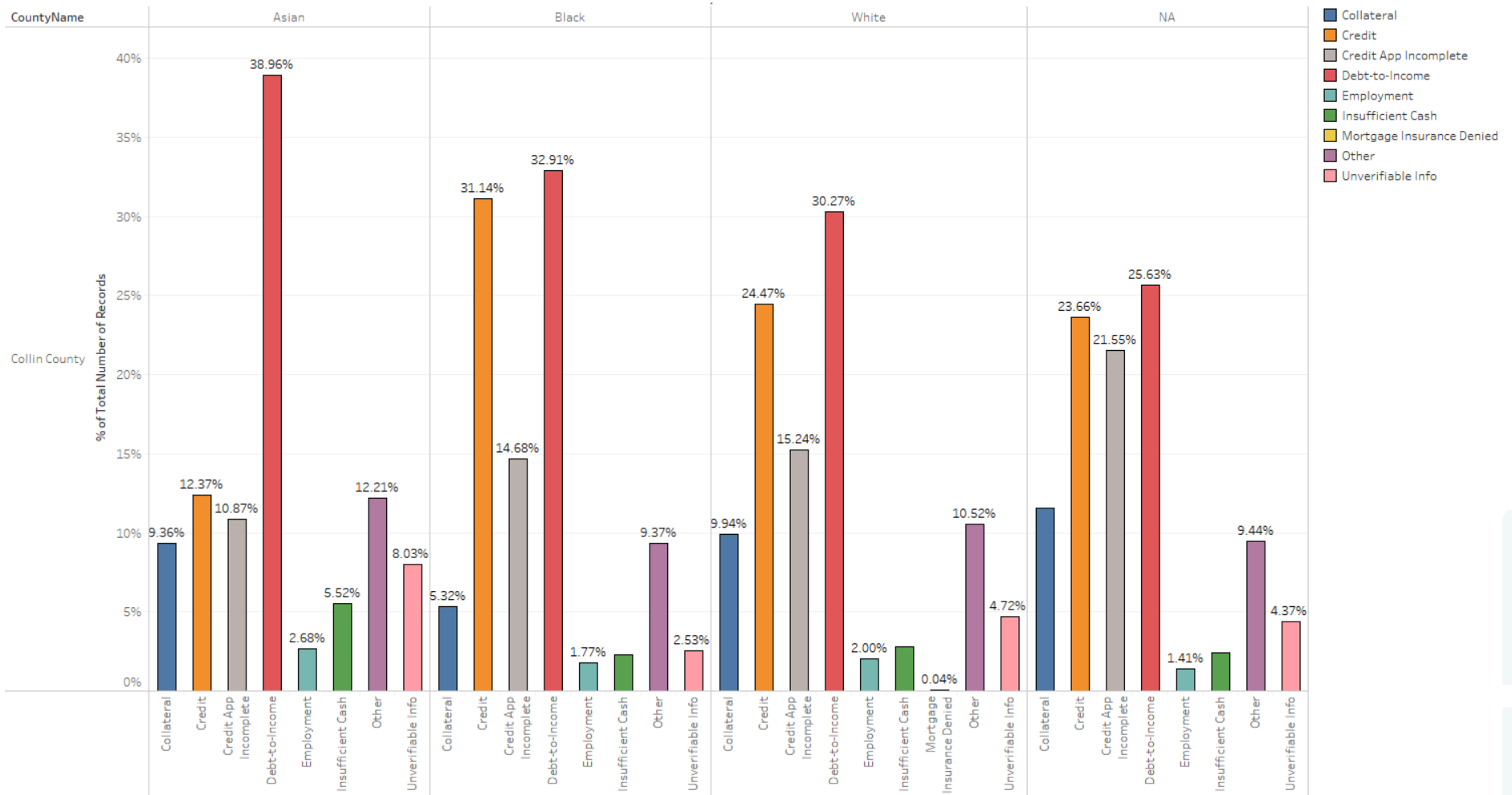


Figure 89: Reason for denial of home mortgage loans in Collin County by race (FFIEC 2016)

3. Contributing Factors of R/ECAPs

Participants in public participation activities offered suggestions regarding the contributing factors of concentration of residents by race, ethnicity and poverty (R/ECAP). Participants in a large focus group of service providers stated that R/ECAPs were largely driven by the location and type of affordable housing. Service providers assisting low-income households in their search for housing reported that options for low-income housing are very limited in affordable price ranges. Affordable options were often of poor quality and in undesirable areas. Service providers reported that housing authority voucher holders experience significant pressure to find a unit within the timeframes required. Voucher holders may settle for a unit in an area where they would not choose to live if not pressed to make a quick decision. These observations are consistent with the findings of HUD's three-year Family Options Study. Researchers observed that pressure to meet timelines for using permanent housing subsidies caused participants to act quickly and choose poor housing situations that were unsustainable (Gubits, et al., 2015). Service providers in Plano also reported that their clients faced discrimination based on race, gender (female) and familial composition (single mothers with children).

Service providers reported source-of-income discrimination as equally important in contributing to the development of R/ECAPs. According to the Plano Housing Authority, only two of every 15 households qualifying for vouchers find a qualifying apartment, sign a contract and move in (Young, 2017). Participants in public engagement stated that landlords considered voucher holders to be a poor rental risk based on their income and negative experience with voucher holders. Landlords seemed to associate voucher holders with criminal behavior. The Plano Housing Authority worked with 366 landlords in 2017; only 77 (21%) are located within the city of Plano. Plano participating landlords accounted for only 38% of the subsidy payments made by the PHA during the first six months of 2017. A plurality of the participating Plano landlords (26%) were in zip code 75074 in east Plano lower income neighborhoods (Young, 2017). Voucher holders were also concentrated in a relatively small number of properties. Twenty-three properties (6%) accounted for 43% of the subsidy payments made.

Collaborations of cities and housing authorities around the U.S. are beginning to see regional cooperation as integral to the prevention of concentrations of poverty and racial and ethnic segregation as a result of the uncoordinated use of vouchers (Pendall, 2017; Mid-America Regional Council, 2017). Housing authorities within the region do not routinely share information about the location of their project- and tenant-based vouchers and may not have specific intergovernmental agreements when they locate voucher holders within the jurisdictions of other housing authorities. The jurisdiction of the Plano Housing Authority extends for 25 miles in every direction from the location of its offices in the center of Plano.

A focus group of Plano homeowners identified a decline in the quality of private investments in east Plano as a contributing factor to the concentration of poverty and increasing concentration of Hispanic residents and businesses in the community. Participants described physical property deterioration, the loss of quality retailers and an increase in unwanted uses such as bars.

Sample comments from the appendix:

- Taking low-income housing seekers to places they did not want to stay, but there were no options
- The time limit to use a voucher puts pressure on housing seekers to find a house because they do not want to lose the voucher, so to utilize it they might move to the area where they might not necessarily want to live.

- Vouchers create segregation. They don't have a choice where to go.
- Single moms having hard times.
- Landlords wouldn't rent to blacks or females in high-opportunity areas.
- We are seeing increasing stigma of low-income and voucher. There is high demand in this area and there is not enough. And they can choose not to take vouchers.
- It's the refusal of developers [to build affordable housing] and landlord voucher [lack of] acceptance; if they have a voucher they [prospective tenants] are considered low income/criminals. It is that stigma about the publicly assisted housing that might be a contributing factor.
- If a landlord had a bad experience with a voucher holder, he might not consider the risk worth the cost
- What is happening now in our area, you only really saw in certain areas of Dallas. We lost chain grocery stores, but now it's like little Mexico. Not everyone has the same value for how they treat the City. East Plano is basically becoming rundown Dallas. We are seeing east Plano deteriorate. Retail is down scaling, more trash. It started with the inclusion of the bar.

iii. Disparities in Access to Opportunity

1. Analysis

a. Education

i

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

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

In Plano, 18% of the Hispanic population lives in block groups (a neighborhood census area smaller than a census tract) with SP scores lower than 39 while less than 1% of the Asian/PI population and less than 4% of the white population live in the same block groups (Figure 90). Almost 8% of the black residents in Plano live near lower performing schools. At the same time, almost 77% of the Asian/PI population lives in block groups with SP scores greater than 80 while only about 31% of the Hispanic population live in similar block groups. Almost 60% of the white population live near very high-performing schools while only 31% of the black population live near these schools. However, over 63% of families with children live in Plano block groups with scores of 80 or higher.

SP Scores	# of Block Groups	% White	% Black	% Hispanic	% Asian/PI	% Families w/child(ren)
0_to_9	0	0.0	0	0	0	0
10_to_19	0	0.0	0	0.0	0.0	0.0
20_to_29	0	0.0	0	0	0	0
30_to_39	11	3.7	7.7	18	0.8	4.8
40_to_49	17	6.3	10.3	14.8	4.4	6.5
50_to_59	31	11.9	13.3	18.8	6.2	9.9
60_to_69	11	5.4	4.5	3.4	3.5	4.3
70_to_79	25	12.8	14	14.0	8.7	11.2
80_to_89	38	22	11.1	11.1	16.5	18.6
90_to_99	66	38	19.9	19.9	60.0	44.7

Figure 90: School Proficiency index scores with block group population demographics for Plano (HUD Common Core/Great Schools 2014, Maponics 2016 and U.S. 2010 Decennial Census)

While some disparities exist between different races and ethnicities in Plano, these become more significant and pronounced at the regional level. Plano significantly outperforms the region with higher SP scores overall (Figure 91). Block groups in the NTRHA region with SP scores lower than 39 contain over 51% of the Hispanic population, over 56% of the Black population, over 19% of the Asian/PI population and over 22% of the white population. Block groups in the NTRHA region with SP scores greater than 80 contain almost 40% of the Asian/PI population, over 33% of the white population and only 11% of the Hispanic and Black populations. Over 32% of families with children across the region live in block groups with school proficiency scores lower than 39.

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

Figure 91: School Proficiency Index scores with block group population demographics for the NTRHA region (HUD Common Core/Great Schools 2014, Maponics 2016 and U.S. 2010 Decennial Census)

ii.

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

According to Figure 92, the highest performing schools tend to occur in newer areas (west and central) of Plano with SP Index scores of 80 to 100. Lower performing schools concentrate east of US 75 and along the southern border of Plano. This trend seems similar to Hispanic vs. non-Hispanic segregation indicating that the Hispanic population tends to be segregated into areas with low SP scores.

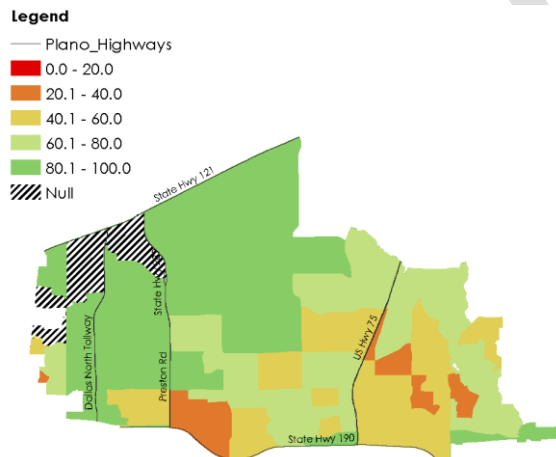


Figure 92: Plano School Proficiency Index Scores (HUD Common Core/Great Schools 2014, Maponics 2016)

Figure 93 shows that the SP index experiences significant geographic variability throughout the region. The largest concentrations of low school proficiency scores are in Dallas and Fort Worth inside their respective interstate highway system loops (I-635 and I-820), especially in east Fort Worth and most of Dallas. School performance appears strongest in many suburban areas, especially those north of the two urban centers. Outside the urban cores, most of the remaining low-performing school communities occur in rural areas.

Legend

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

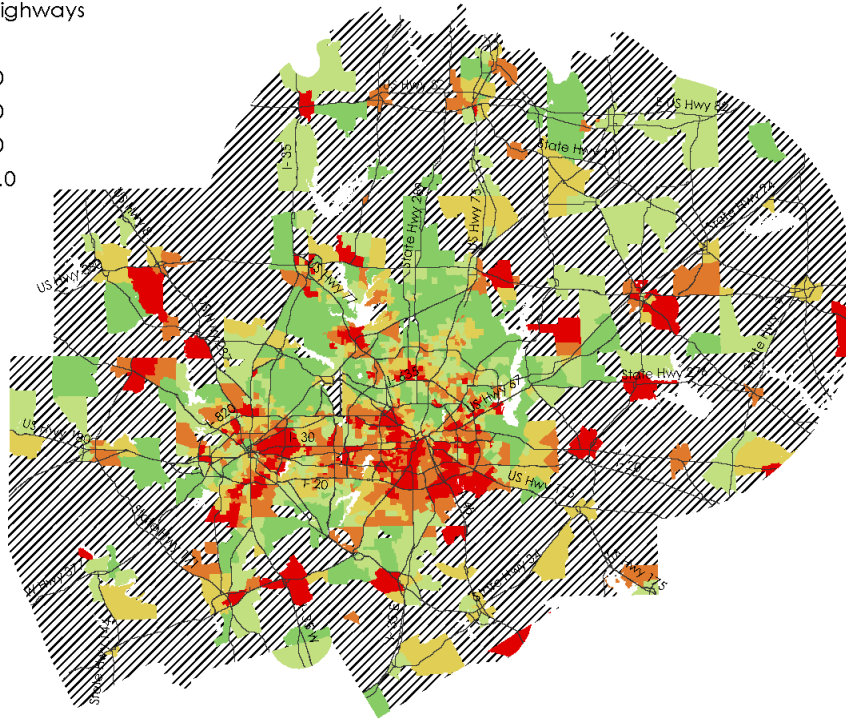


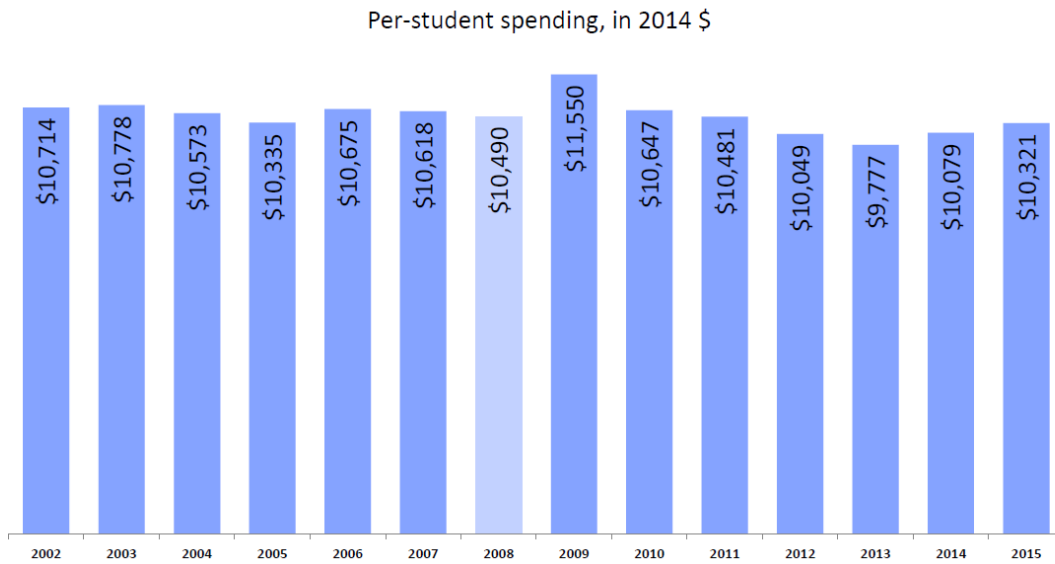
Figure 93: NTRHA region school proficiency index scores (HUD Common Core/Great Schools 2014, Maponics 2016)

iii.

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

The state of Texas restricts its expenditures on education. Figure 94 shows statewide per-student expenditures in constant 2014 dollars. In real terms, with the exception of an increase in 2009, per student expenditures are below 2003 levels and average expenditure levels after the recession of 2008/09 are \$400 less than before the recession. This is during a period of rapid growth in public school district enrollments across the state, including students who are English language learners and/or from impoverished households (Villanueva, 2015). Evidence shows that additional funding improves student performance outcomes by reducing class sizes, improving curriculum, addressing specific student challenges, providing pre-kindergarten programs, retaining the best teachers, and providing special programming for struggling learners (Lesley, 2010).

School Funding is Still Below Pre-Recession Levels



Source: CPPP analysis of TEA appropriations plus local revenue values from LBB.

CPPP.org



Figure 94: Texas per-student spending 2002-2015 (CPPP, TEA/LBB)

Four school districts operate within the City of Plano, including Plano ISD, Allen ISD, Frisco ISD and Lewisville ISD. Texas has an extremely complex system for school finance that increasingly relies on local property tax revenue, which is heavily dependent on property wealth (Villanueva, Education: Latest Work, 2018). To adjust for differences in property wealth among districts, the state recaptures revenue from wealthy districts and redistributes the funds to property-poor districts. Figure 95 and Figure 96 below show per-student revenue by source, and program expenses by type, for Frisco, Plano, Allen and Lewisville school districts (Texas Education Agency, 2018). Figure 95 shows heavy reliance on local revenue and disparities between districts due to property wealth. Plano ISD revenues are significantly higher than the other school districts.

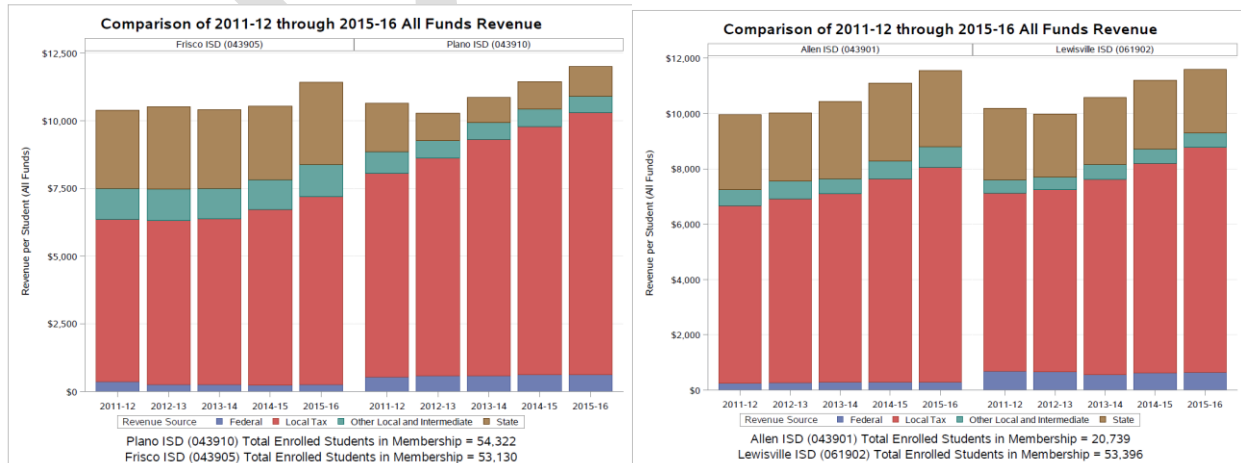


Figure 95: All funds revenue per student 2011-2016 (TEA)

Figure 96 shows that, even after redistribution of funds from wealthy to relatively poor districts, significant differences exist between districts in what they are able to spend on programs. Frisco and Allen school districts spent just over \$6,000 per student in 2015-2016 for programs while Plano and Lewisville school districts spent nearly \$7,000. School districts have unique demographic profiles and Texas applies a system of weights to its funding in order to make adjustments for differences in numbers of special education students, English language learners, low-income and at-risk students and other special populations. However, the weights used have largely not been updated in 30 years and are underfunded (Villanueva, 2018). Texas courts have repeatedly ruled that funding for Texas schools is inadequate and should be improved (Lee, Deviney, & Sohn, 2017).

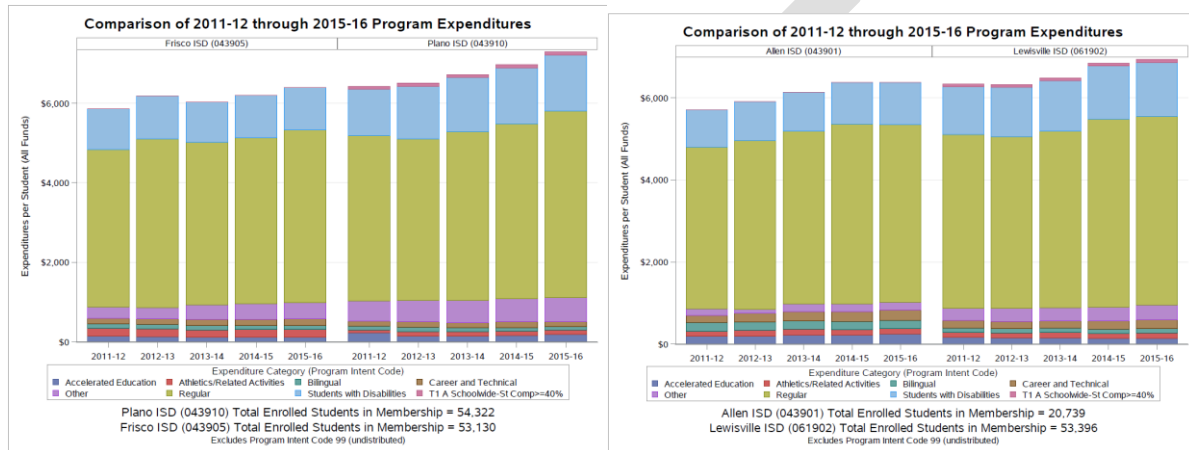


Figure 96: Program expenditures by type, TEA, 2011 – 2016

Students in Collin County must attend schools within the attendance zones in which the family resides. Exceptions are allowed if the local school has no space available or the student has a special situation (e.g., the family is living with another family and has no home of their own). Students must show evidence of residency (Plano Independent School District, 2018; Allen ISD, 2018; Lewisville ISD, 2018; Frisco ISD, 2018). Most of the City of Plano falls within the boundaries of Plano ISD (Figure 97).

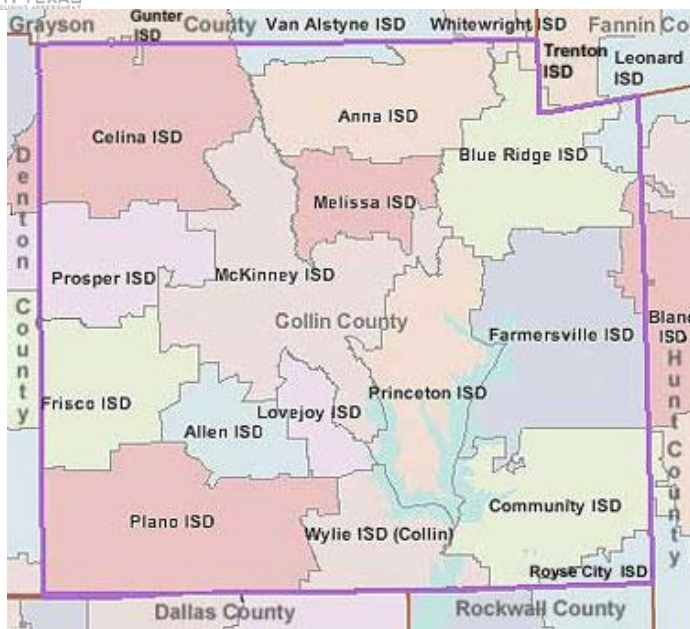


Figure 97: School district boundaries, Collin County

Overall, Collin County school districts rate highly for meeting third-grade reading standards, high school performance and completion rates, and college enrollment and completion (Center for Public Policy Priorities, 2015). To address special needs, Plano ISD offers pre-kindergarten classes and Head Start programs to children age 3 or 4 who are limited English speaking, low income, homeless or developmentally delayed (Plano ISD, 2018). Figure 98 shows the percent of all students who are not considered economically disadvantaged by Collin County school district, including and surrounding Plano ISD. The percent of students who are not economically disadvantaged ranges from a low of 71.39% in Plano to a high of 97.4% in Lovejoy ISD in the districts surrounding Plano (Texas Education Agency, 2017).

Name	% students not economically disadvantaged
Plano ISD	71.39%
Frisco ISD	89.50%
Allen ISD	85.04%
Lovejoy ISD	97.40%
Wylie ISD	82.22%
Average	85.11%

Figure 98: Percent of students not economically disadvantaged by school district

Significant disparities in student outcomes exist in Collin County for economically disadvantaged, Hispanic and black students as compared with white students. Figure 99 shows performance outcomes for special student populations within Collin County school districts. Economically disadvantaged, Hispanic and black students fall behind white students in meeting third-grade reading standards and other outcomes (Center for Public Policy Priorities, 2015). Collin County schools average slightly higher than the state average in funding per student and

significantly exceed state averages for enrollment in Advanced Placement and International Baccalaureate and college readiness. However, only 58.3% of eligible students (low-income, etc.) participate in Collin County publicly provided pre-kindergarten programs compared with 74.5% of eligible students participating statewide.

Student Groups in Collin County	Percent of All Students in Collin County	Do Not Meet Third-Grade Reading Standards	Must Repeat 9th Grade	Drop out of High School	Do Not Enroll in Texas Colleges	Drop out of College
All Students, Collin County	100%	41%	3.4%	1.3%	43.4%	46.5%
Economically Disadvantaged	22.5%	67.0%	8.4%	3.3%	49.7%	62.5%
Hispanic	20.1%	60.0%	6.7%	2.7%	50.2%	62.9%
White	50.8%	37.0%	2.1%	1.0%	44.9%	46.5%
Black	10.8%	57.0%	5.8%	1.5%	46.7%	67.8%

Figure 99: Student outcomes in Collin County for special groups (groups not mutually exclusive)

Figure 100 compares 2017 third-grade reading proficiency for students at four Plano ISD elementary schools located in southeast Plano, a lower income community (Texas Education Agency, 2017). Eighty-eight percent of students at Mendenhall Elementary school are economically disadvantaged compared with 29% in Plano ISD overall. Eighty-three percent (83%) of third-grade students in Plano read at or above grade-level standards. Only 47%-69% of the students in the four lower income schools were able to read at or above grade level. In Meadows and Forman elementary schools*, there were too few white students to allow the publication of performance results.

Campus	Total Students	Black Students	Hispanic Students	White	Economically Disadvantaged
District	83%	69%	69%	90%	29%
Mendenhall	60%	64%	54%	89%	88%
Memorial	69%	86%	66%	82%	82%
Meadows	47%	71%	43%	*	84%
Forman	62%	50%	70%	*	81%

Figure 100: Percent of third-grade students reading at or above grade-level standards by campus

Participants in public participation events identified the importance of the location of proficient schools and school assignment policies to access to opportunity. ICP representatives stated that one of the primary reasons their clients choose to move out of historically segregated neighborhoods is to have access to higher performing schools. Participants stated that many families move into Plano in order meet residency requirements and get access to high-quality Plano schools.

b. Employment

i

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

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

In Plano (Figure 101), over 90% of the Asian/PI population, over 79% of the white population and over 67% of the black population live in census tracts with LME scores greater than 80 while only 53% of the Hispanic population live in similar census tracts. While some disparities exist between different races and ethnicities in Plano, these become more significant and pronounced at the regional level (Figure 102); furthermore, Plano significantly outperforms the region. Census tracts in the DFW region with LME scores lower than 39 contain over 47% of the Hispanic population, over 42% of the black, less than 12% of the Asian/PI population and less than 18% of the white population. DFW regional census tracts with LME scores greater than 80 contain almost 53% of the Asian/PI population, over 37% of the white population and only 17% of the black and 13% of the Hispanic populations.

Families with children do not appear to be significantly disadvantaged in Plano; however, this trend does not appear as clear regionally because over 27% of families with children live in census tracts with labor market engagement scores lower than 39. For the other protected groups, a similar trend occurs where Plano significantly outperforms the DFW region. In fact, no Plano residents live in locations with labor market engagement scores lower than 39.

In Plano, 58% of the residents with incomes at or below 30% of area median income (ami30) live in census tracts with labor market engagement scores greater than 80 while in the region, only 15% live in census tracts with labor market engagement scores greater than 80 and over 47% live in census tracts with labor market engagement scores lower than 39. In Plano, 55% of residents with incomes at or below 50% of the area median income (ami50) live in census tracts with labor market engagement scores greater than 80 while in the DFW region, only 15% live in census tracts with labor market engagement scores greater than 80 and 42% live in census tracts with labor market engagement scores lower than 39. In Plano, 64% of residents with incomes at or below 80% of area median income (ami80) live in census tracts with labor market engagement scores greater than 80 while in the region, only 20% live in census tracts with labor market engagement scores greater than 80 and about 34% live in census tracts with labor market engagement scores lower than 39. In Plano, 59% of the limited English proficiency population live in census tracts with labor market engagement scores greater than 80 while in the region, only 14% live in census tracts with labor market engagement scores greater than 80 and over 47% live in census tracts with labor market engagement scores lower than 39. In Plano, 77% of the foreign-born population live in census tracts with labor market engagement scores greater than 80 while in the region, only 24% live in census tracts with labor market engagement scores greater than 80 and almost 38% live in census tracts with labor market engagement scores lower than 39. In Plano, over 68% of residents with a disability live in census tracts with labor market engagement scores greater than 80 while in the region, only 19% live in census tracts with labor market engagement scores greater than 80 and about 38% live in census tracts with labor market engagement scores lower than 39. The white population equals or outperforms all protected classes except Asian/PI in Plano and the region.

LME Scores	Number of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% <30% AMI	% 30-49% AMI	% 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-19	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
20-29	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
30-39	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
40-49	2	2.6	5.7	9.5	0.7	6.4	7.7	5.3	6.6	3.5	3.0	3.9
50-59	1	0.8	1.7	6.2	0.2	3.5	4.9	2.9	6.3	2.4	1.2	2.0
60-69	4	4.0	5.4	13.2	1.8	11.5	6.6	7.8	11.0	5.1	4.0	7.7
70-79	12	13.3	19.7	18.2	6.9	20.3	25.6	20.0	16.9	12.5	12.2	17.7
80-89	14	19.3	19.2	16.2	16.8	20.1	22.0	19.0	15.3	18.3	17.1	20.9
90-99	43	59.9	48.3	36.7	73.7	38.1	33.2	45.0	43.9	58.2	62.5	47.7

Figure 101: Demographics of census tracts in Plano by Labor Market Engagement Index scores for protected groups (HUD, ACS 2013 and U.S. 2010 Decennial Census)

LME Scores	# of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	73	1.4	11.7	6.0	0.8	9.6	6.1	3.9	6.0	4.4	3.2	5.9
10-19	95	3.1	11.5	11.6	1.7	11.8	9.8	7.4	10.9	8.3	6.0	9.0
20-29	114	5.8	8.6	14.7	4.0	13.0	12.0	10.7	15.6	12.4	8.4	10.4
30-39	137	7.7	10.8	14.9	4.6	13.1	14.1	11.9	15.2	12.6	9.7	12.2
40-49	135	9.6	7.9	11.8	5.4	11.0	12.6	11.8	11.7	10.0	9.7	11.3
50-59	129	10.1	9.7	9.8	6.6	9.4	10.4	10.8	9.1	8.6	9.7	10.8
60-69	130	10.4	10.8	8.9	10.2	8.4	9.6	10.6	9.0	9.1	10.1	9.7
70-79	166	14.8	12.2	8.9	13.7	8.3	10.2	12.5	8.0	9.9	12.8	11.3
80-89	164	16.1	9.1	7.5	17.9	7.3	7.7	9.9	7.3	10.4	13.5	9.6
90-99	250	21.1	7.7	6.0	35.0	8.1	7.6	10.4	7.1	14.2	16.9	9.6

Figure 102: Demographics of census tracts in NTRHA region by Labor Market Engagement Index scores for protected groups (HUD, ACS 2013 and U.S. 2010 Decennial Census)

The Jobs Proximity (JP) index quantifies access to jobs in a census block group as a function of its distance to all job locations within a greater metropolitan area, with larger employment centers weighted more heavily (HUD, 2017). Ninety block groups in Plano have JP scores below 50 while 109 have scores higher than 50. Forty-six percent of black residents and 42% of Hispanic residents live in block groups with scores below 50. Over half of families with children live in block groups with JP scores below 50.

JP Scores	# of Blk. Grps.	% White	% Black	% Hispanic	% Asian/PI	% Families w/child(ren)
0-9	14	6	6	9	2	5
10-19	20	11	10	10	12	12
20-29	12	7	7	4	8	8
30-39	20	11	10	8	16	12
40-49	24	15	13	11	19	17
50-59	26	14	14	13	10	13
60-69	16	8	7	9	6	7
70-79	13	6	9	12	5	7
80-89	23	9	12	8	13	9
90-99	31	13	13	16	8	10

Figure 103: Jobs Proximity Index Scores by census block groups with protected class demographics, Plano (HUD, LEHD 2013 and U.S. 2010 Decennial Census)

Figure 104 displays the number of block groups scoring in each decile of the JP index along with the percentage of protected groups living in that decile in the NTRHA region. Fifty-seven percent of black residents live in block groups with JP scores below 50 while 61% of white residents live in

block groups with JP scores below 50. The same pattern exists for Hispanic residents (63%) and families with children (65%).

JP Scores	# of Blk. Grps.	% White	% Black	% Hispanic	% Asian/PI	% Families w/child(ren)
0-9	439	8	14	12	8	10
10-19	437	9	11	11	11	10
20-29	441	11	12	10	11	11
30-39	442	12	10	11	11	12
40-49	436	11	10	10	13	11
50-59	439	11	9	9	10	10
60-69	441	11	8	9	9	10
70-79	437	10	8	10	8	9
80-89	436	9	9	9	9	9
90-99	435	8	8	9	9	7

Figure 104: Jobs Proximity Index scores by census block groups with protected class demographics, NTRHA region (HUD, LEHD 2013 and U.S. 2010 Decennial Census)

ii.

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

According to Figure 105, most areas in Plano have high Labor Market Engagement Index scores. Meanwhile, the concentration of moderate scoring census tracts (40.1 to 60.0) occurs adjacent to US 75 in east Plano. This location overlaps with the greatest concentrations of the Hispanic population indicating segregation of the Hispanic population in Plano into areas with moderate Labor Market Engagement Index scores.

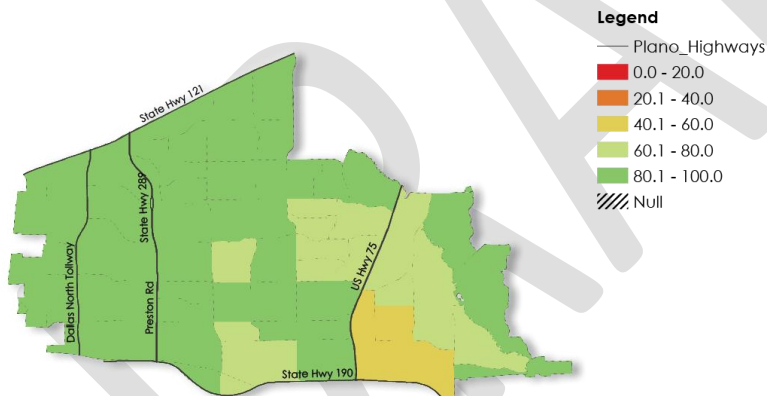


Figure 105: Labor Market Engagement Index Map of Plano (HUD, LEHD 2013)

The Jobs Proximity Index (JP) uses high scores to indicate high access to jobs and low scores to indicate low access. M Plano scores show lower proximity to jobs (0%-60%). Far southeast Plano, with higher poverty and greater segregation shows several areas of high job proximity (80.1%-100%).

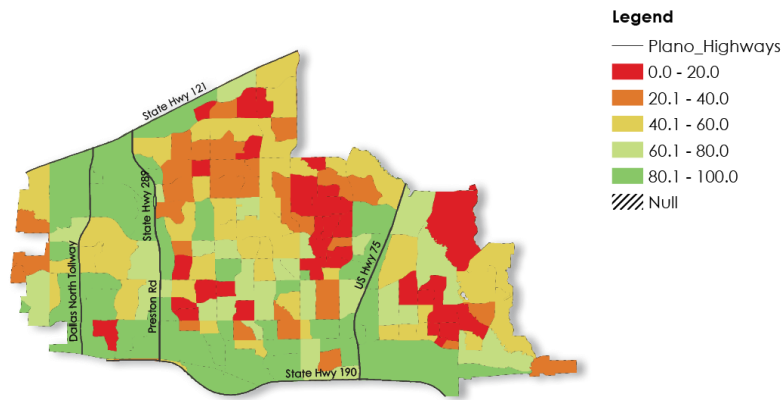


Figure 106: Plano Jobs Proximity Index (HUD, LEHD 2013)

At the regional level, Figure 107 shows that the LME index experiences clear trends. The labor market indices for Dallas and Fort Worth show that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have lower labor market engagement. The suburban areas within the NCTCOG planning area have the strongest labor market engagement; however, some suburban areas in Dallas and Tarrant County do not score as well, and south and southeast Dallas County perform particularly poorly. Most rural census tracts have at best a moderate LME score; however, a few exceptions emerge in Cooke, Ellis and Parker counties.

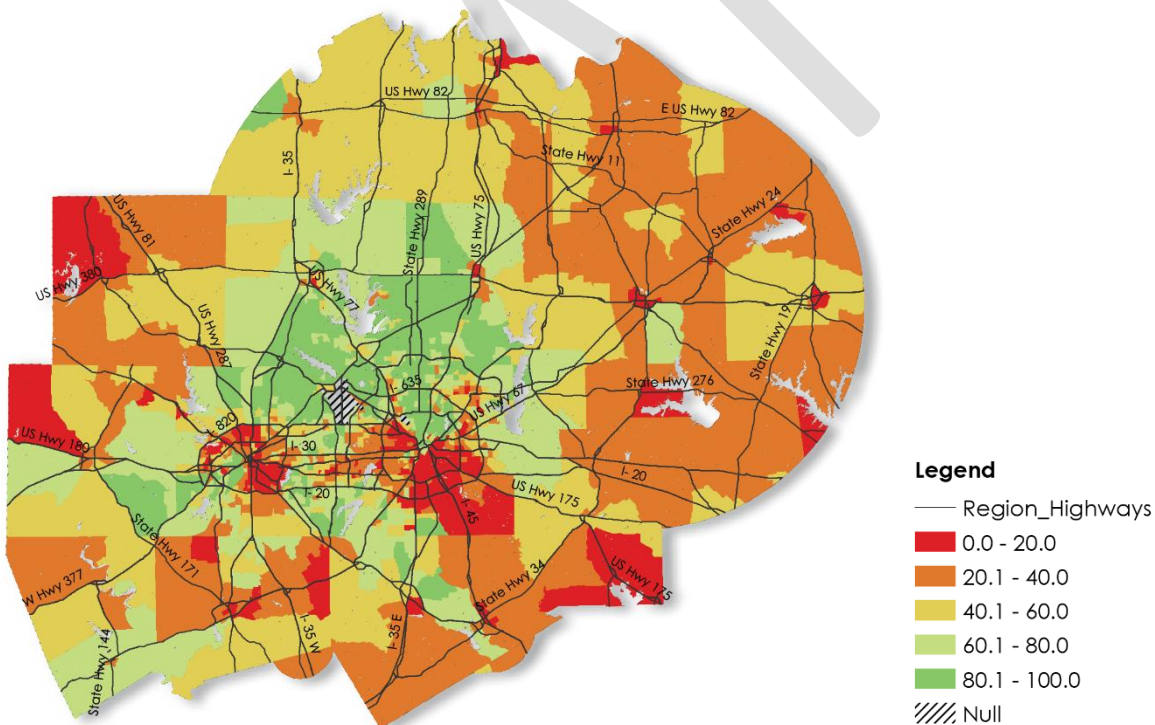


Figure 107: Labor Market Engagement Index map for the region (HUD, LEHD 2013)

Figure 108 displays the average JP score for each block group in the NTRHA region. Lower JP scores are found in the north and east regions of the jurisdiction. Areas of highest access to jobs trace the highway system with north Dallas having larger areas with the highest scores. Greater access to jobs extends into northeastern Tarrant County.

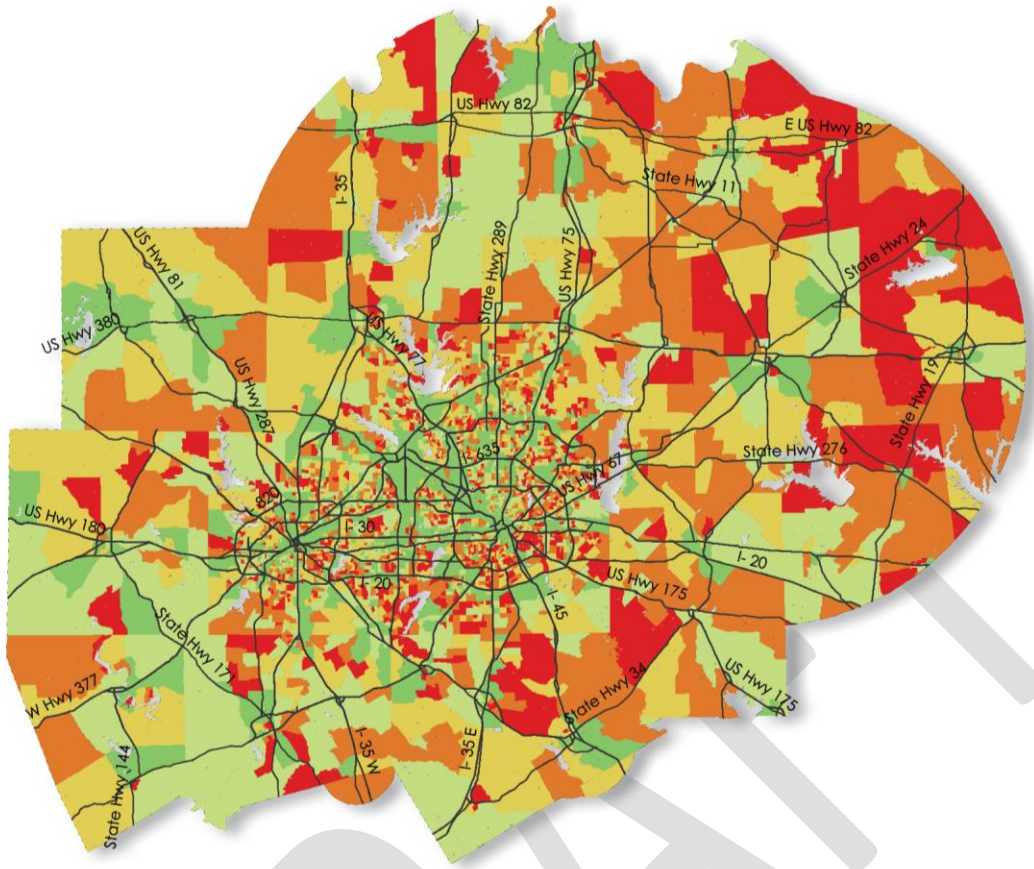


Figure 108: Job Proximity Index scores by block group for NTRHA region (HUD, LEHD 2013)

iii.

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

Participants in public participation events identified the location of employers as an important contributing factor to access to opportunity and a common reason for housing relocation. Participants said that jobs are not located near housing affordable to the employees and that the problem is exacerbated by the lack of affordable transportation connecting jobs with affordable housing. Many participants stated that more affordable housing is needed that could meet the needs of low- and moderate-income households, including young families, workforce wage earners, police, fire, nurses, teachers, waiters and retail workers. Participants stated that both housing product configurations (e.g., smaller, one-story) and affordable housing price points are not available to meet the needs of all workers.

The City of Plano and the immediate surrounding areas are home to strong job growth and employment opportunity. The Dallas-Irving-Plano metropolitan area is home to many growing industry clusters that exceed national averages for employment concentration (Assanie, Davis, Orrenius, & Weiss, 2016). These industries, including business and financial services, defense and security, and information technology and telecommunications, have seen employment growth up to 35% between 2006 and 2014. This group of industries offered average annual earnings of between \$82,667 (defense and security) and \$106,007 (information technology and

telecommunications) in 2014 (Assanie, Davis, Orrenius, & Weiss, 2016). Industry clusters with the highest growth in employment from 2006 to 2014 were education (48%) and health services (43%) in the Dallas-Plano-Irving area.

Plano is a growing site for corporate headquarters, including 230 corporate and regional headquarters employing over 47,000 workers (City of Plano, 2017). ICP representatives stated that one of the factors motivating their clients to move out of high-poverty communities and into communities like Plano is to have greater access to job centers. Approximately 230,000 employees work at over 600 employment sites with the highest concentrations of jobs located along the Us 75 corridor; in far northwest Plano, anchored by Toyota and Frito-Lay; and along the southern border of Plano (North Central Texas Council of Governments, 2018). The Legacy at Spring Creek is a prominent example of new development, including office, hotel and retail space in northwest Plano along the Dallas North Tollway (Brown, 2017). Other planned projects include the addition of 150,000 square feet of office space and 300 employees at USAA's northwest Plano location (Brown, 2017). No new major employment developments were planned for east and central Plano as of 2017 (City of Plano, 2017). Employment increased overall by 2.4% in 2017 (Dallas-Plano-Irving) led by increases in lower wage leisure and hospitality jobs (5.6%) and other service jobs (5%) (United States Department of Labor, 2017). From 2007 to 2017, employment grew by 22% in the Dallas-Plano-Irving metropolitan area.

Plano employers struggle to attract and retain service and support staff, especially in the Legacy West business corridor of far northwest Plano, in part due to the lack of nearby affordable housing (Powell, 2017). While Plano's wage rates are generally higher than average for the U.S., many jobs do not pay enough to afford available housing (Sperling's Best Places, 2016). Figure 109 compares median monthly earnings per wage earner with median estimated rents and median estimated values of single-family homes for the City of Plano from 2011 through 2016 (Zillow, 2018; United States Census Bureau, 2018). Home values increased 42% and rents increased 16% while earnings increased only 7% during the five-year period. Multifamily rents increased by 23% from 2012 to 2017 (MPF Research, 2017). Median single-family home rents are unaffordable to single workers earning the median wage, exceeding the 30% of income affordability benchmark by 16-20 percentage points.

Year	Plano Median Est. Monthly Earnings	Median Est. Rent for SF Home	Rent per Earnings	Median Est. Home Value
2016	\$ 3,938	\$1,952	50%	\$285,000
2015	\$ 3,873	\$1,884	49%	\$253,000
2014	\$ 3,804	\$1,777	47%	\$230,000
2013	\$ 3,709	\$1,712	46%	\$208,000
2012	\$ 3,712	\$1,667	45%	\$201,000
2011	\$ 3,667	\$1,687	46%	\$201,000
% Increase	7%	16%		42%

Figure 109: Cost to rent a single-family home in Plano compared with Plano median earnings over time

Public participants said that job growth has included many lower income jobs while housing supply growth has been in higher cost housing products. Figure 110 displays median monthly 2016 earnings for Plano's lowest wage occupations. People in these positions earn monthly median wages ranging from \$1,046 to \$3,363 (United States Census Bureau, 2016). Affordable rents for individuals in these jobs would range from \$314 to \$1,009 per month at no more than 30% of income spent on housing. The fourth column shows that the affordable rent for all

occupational groups was less than 40% of the 2016 median rent for single-family homes in Plano. None of these workers could afford to rent a single-family home with one income. The lack of housing for low-wage earners is further revealed by the share of these workers who live in Plano. More than 43,000 people in Plano were employed in these lower wage jobs in 2016 (U.S. Census Bureau, 2016). The average multifamily apartment rent in west Plano in the third quarter of 2017 was \$1,292 overall and \$976 per month for an efficiency unit. In central and east Plano, rents averaged \$1,195 per month and efficiencies (the smallest apartments) rented for \$908 (MPF Research, 2017). Only sales and arts and entertainment workers could affordably rent an efficiency apartment (studio) in east Plano. The remaining workers would have to spend from \$232 to \$594 per month more than they could afford (at 30% of income).

Lower Wage Occupations in Plano	# Employed	Median Monthly Earnings	Affordable Monthly Rent @ 30% of Income	Housing Cost Gap @ \$908 per month rent
Sales and related	18,248	\$ 3,363	\$1,009	\$101
Arts, Entertainment, Recreation	2,880	\$ 3,241	\$972	\$64
Construction, Extraction	3,196	\$ 2,253	\$676	-\$232
Firefighters	1,175	\$ 2,031	\$609	-\$299
Healthcare Support	1,960	\$ 2,010	\$603	-\$305
Cleaning, Maintenance	3,654	\$ 1,444	\$433	-\$475
Personal Care	3,856	\$ 1,436	\$431	-\$477
Food Prep, Serving	6,930	\$ 1,214	\$364	-\$544
Material Moving	1,558	\$ 1,046	\$314	-\$594

Figure 110: Comparison of average rent required to purchase an efficiency apartment in east Plano (\$908/month) with rents affordable to lower wage workers

Plano offers opportunities for workers and job seekers to increase their skills and qualify for higher paying jobs. Workforce development has a prominent place in Plano's Comprehensive Plan. The City has set goals to "assist the education and business communities in developing a competitive workforce to provide job skills demanded by the regional market place and employment opportunities for local graduates" (City of Plano, 2015). The City of Plano partners with the following organizations to achieve this goal:

- Collin College Center for Workforce and Economic Development
- Collin Small Business Development Center
- UT-Dallas Center for Intelligent Supply Networks
- SMU-in-Plano Cox Executive Education
- Workforce Solutions in North Central Texas
- Texas Manufacturing Assistance Center
- Southeast Plano Business Alliance
- Business Accelerator
- Plano Chamber of Commerce

c. Transportation

i

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

Low Transportation Cost Index (LTC)

This index estimates the transportation costs for a family that meets the following description: a three-person single-parent family with income at 50% of the area median income for renters for the region. Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. A higher index score indicates lower transportation cost for a neighborhood.

The Low Transportation Cost (LTC) index sees similar values occurring across all groups in Plano (Figure 111) and the DFW region (Figure 112). In Plano, over 14% of white residents, 21% of Asian/PI residents, 14.7% of foreign born and 17.5% of families with children live in census tracts with an index of 39 or less. Within the DFW region, all special groups have better scores than the white population, a likely result of the greater proportion of the white residents in the suburbs where transportation costs are higher than in the primary urban cores (Dallas and Fort Worth).

LTC Scores	Number	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-19	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
20-29	4	5.7	6.5	3.4	7.5	1.9	2.8	3.2	4.8	5.7	6.5	4.3
30-39	5	8.4	5.5	4.2	13.8	2.7	3.0	2.4	7.8	9.0	11.0	4.7
40-49	11	15.7	10.1	9.7	15.3	5.7	6.4	8.7	9.3	11.5	16.2	12.9
50-59	11	17.1	12.8	10.7	18.7	8.5	10.4	10.9	12.6	15.6	17.2	17.3
60-69	12	14.7	16.2	22.3	10.4	22.0	22.5	18.7	19.9	16.3	13.9	18.8
70-79	21	25.6	31.7	31.8	24.2	36.4	32.4	31.1	27.6	26.9	24.0	26.7
80-89	8	9.6	9.3	14.4	7.0	17.6	14.6	15.1	15.3	10.7	7.9	11.6
90-99	3	3.1	7.9	3.4	2.9	5.4	8.0	9.9	2.8	4.3	3.2	3.7

Figure 111: Demographics of census tracts by Low Transportation Cost Index for protected classes in Plano (HUD, LAI 2012 and U.S. 2010 Decennial Census)

Trans Cost Index Scores	Number	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	14	1.6	0.2	0.3	0.1	0.9	1.0	1.0	0.3	0.2	0.8	2.0
10-19	30	3.3	0.6	0.8	0.3	1.5	2.0	1.8	0.6	0.6	1.8	3.2
20-29	107	12.7	4.5	3.8	5.9	4.5	4.9	6.1	2.5	3.9	8.9	8.4
30-39	187	20.6	10.3	9.3	13.7	9.3	10.1	11.6	7.2	9.4	16.9	15.7
40-49	194	15.9	16.9	12.2	14.5	9.9	11.3	12.8	10.5	11.2	15.9	14.6
50-59	195	12.7	15.3	17.8	12.7	13.4	14.1	14.0	16.3	15.3	14.6	14.5
60-69	245	13.3	20.0	23.3	16.8	20.5	20.2	19.4	23.6	21.3	16.8	18.7
70-79	194	10.1	15.5	15.7	15.4	17.8	15.6	14.5	17.1	16.3	12.2	12.3
80-89	156	7.0	12.0	10.8	14.7	14.9	13.9	12.6	13.6	13.9	8.6	8.1
90-99	70	2.8	4.8	6.0	5.9	7.3	6.9	6.3	8.3	7.9	3.5	2.6

Figure 112: Demographics of census tracts by Low Transportation Cost Index for protected classes in NTRHA region (HUD, LAI 2012 and U.S. 2010 Decennial Census)

Transit Trip Index

This index estimates the number of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50% of the median income for renters for the region. Scores are compared with a national distribution and range from 0 to 100. As the transit trips index increases, residents in that neighborhood are more likely to utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit. Transit trip index scores are very similar to the low cost transportation index scores and similar scores occur across all groups in Plano. In Plano, 15% of the white population lives in census tracts with low transit trip index scores of 39 or less and none of the protected classes has a significantly higher percentage (Figure 113). Within the DFW region (Figure 114), all protected groups have better scores than the white population; this likely results from the greater proportion of the white population residing in the suburbs, where the transit service may not be available, rather than the primary urban cores (Dallas and Fort Worth). Plano performs better than the overall DFW region because it is part of Dallas Area Rapid Transit (DART).

Trans Trip Index Scores	Number of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-19	1	1.0	0.7	0.6	1.6	0.3	0.3	0.5	0.4	1.2	1.0	0.7
20-29	1	1.0	1.5	0.9	0.6	1.3	0.2	2.2	0.1	1.2	0.6	0.7
30-39	9	12.6	12.3	13.2	12.3	10.4	8.8	7.5	11.4	11.5	12.6	11.4
40-49	34	47.3	40.0	35.6	46.2	37.7	38.6	35.8	37.7	39.9	47.6	45.8
50-59	24	31.5	32.5	36.8	32.2	35.4	39.9	37.6	37.7	36.7	30.9	31.8
60-69	5	5.7	7.7	11.1	6.6	12.0	6.8	11.2	12.1	8.5	6.1	8.0
70-79	1	0.9	5.4	1.7	0.5	2.8	5.5	5.2	0.7	1.0	1.2	1.5
80-89	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
90-99	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Figure 113: Demographics of census tracts in NTRHA region by Transit Trip Index for protected classes in Plano (HUD, LAI 2012 and U.S. 2010 Decennial Census)

Trans Trip Index Scores	Number of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	40	4.2	0.6	1.0	0.5	2.0	2.3	2.2	0.7	0.8	2.3	4.0
10-19	20	2.0	0.4	0.6	0.6	0.8	1.0	1.2	0.4	0.5	1.2	1.5
20-29	136	15.6	4.4	5.6	3.3	7.4	8.0	8.9	3.4	4.0	10.3	12.2
30-39	228	20.8	15.6	13.8	15.9	12.1	12.9	14.3	11.3	12.9	18.5	17.2
40-49	450	31.5	37.6	34.4	35.3	28.7	30.3	31.2	32.5	32.8	34.6	32.7
50-59	315	16.8	24.4	27.6	26.9	27.2	25.2	23.7	30.2	28.1	21.0	21.6
60-69	145	6.7	12.2	11.3	13.2	15.0	13.6	12.7	13.7	13.5	8.9	8.3
70-79	57	2.3	4.7	5.7	4.0	6.5	6.5	5.8	7.8	7.2	3.2	2.5
80-89	1	0.0	0.1	0.1	0.2	0.2	0.2	0.1	0.1	0.2	0.1	0.0
90-99	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Figure 114: Demographics of census tracts in NTRHA region by Transit Trip Index for protected classes in NTRHA region (HUD, LAI 2012 and U.S. 2010 Decennial Census)

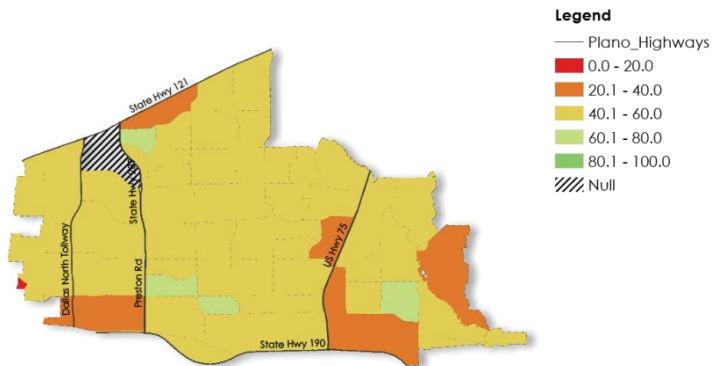


Figure 117: Transit Trip Index Map of Plano (HUD, LAI 2012)

At the regional level, Figure 118 shows that the Transit Trip Index shows trends similar to the Low Transportation Cost Index. For this index, locations near transit service and the urban core appear to have higher scores than rural areas. Suburban areas have low scores. This index produces some unusual results where some locations without transit service (i.e. Arlington) receive moderate scores.

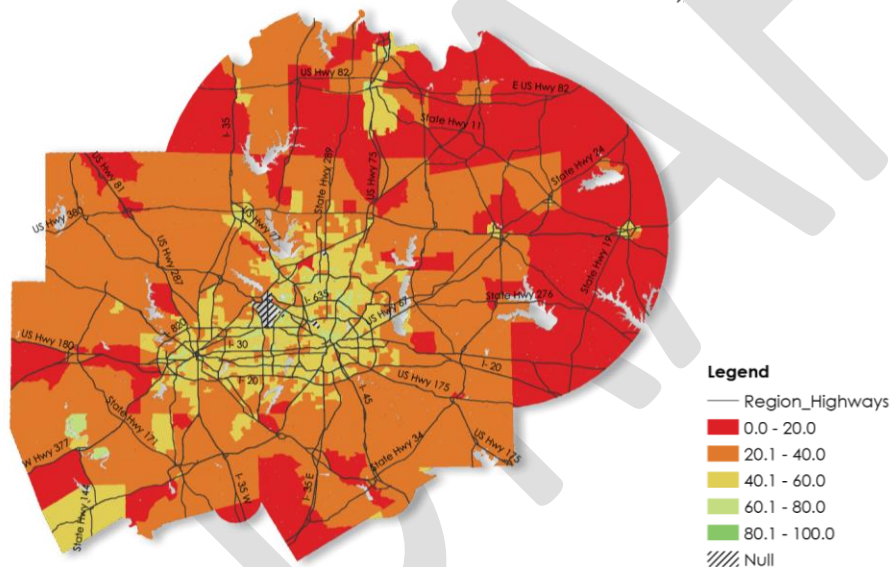


Figure 118: Transit Trip Index map of the region (HUD, LAI 2012)

iii

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

A significant portion of comments from public participation in relation to access to opportunity concerned the availability, type, frequency and reliability of public transportation. Low-income participants explained that they were precariously dependent on owning their own car in order to get to work and meet other needs. Retail and other services such as grocery stores are not located within comfortable walking distance from housing. Participants commented that they welcomed access to rail service and that people were motivated to live near the rail station. However, access to public transit is limited within subdivisions, creating problems with first-and-

last-mile transportation to major bus and rail routes. Needs for improved access to affordable public transportation were identified as one of two impediments to fair housing choice in the City of Plano's Con Plan (City of Plano, 2015). The Plano Chamber of Commerce has reported that businesses in high-opportunity west Plano are having trouble hiring and retaining support staff, including back office and service positions, due to the lack of adjacent affordable housing and public transportation (Powell, 2017).

Transportation is one of the City of Plano's Comprehensive Plan pillars (City of Plano, 2015) and includes goals (work now in progress) to improve public transit, including:

- Inform and promote Dallas Area Rapid Transit (DART) services offered in Plano to city residents
- Increase the number of public transit options throughout all of Plano by working with DART to enhance service provision
- Study the feasibility and identify the required infrastructure and routes for a Bus Rapid Transit Program.
- Investigate feasibility of partnerships regarding for the provision of trolley services with major destination areas.

The City of Plano is served by DART, including light rail, local and express bus service. Figure 119 shows the number of transit trips in fiscal years 2015 and 2016 from October through July (10 months). Comments from public participants indicated that services would be more heavily used if they were available at the locations and times needed.

Plano Summary Statistics			
October-July, FY15-16			
	YTD FY15	YTD FY16	Change
Plano LRT Stations	953,005	877,615	-7.9%
Weekday Plano Bus Routes	2,322,693	2,230,111	-4.0%
Saturday Plano Bus Routes	109,657	96,713	-11.8%
Sunday Plano Bus Routes	52,581	43,504	-17.3%
	3,437,936	3,247,944	-5.5%

Figure 119: Dallas Area Rapid Transit service to the city of Plano

The City of Plano began working in 2017 with private businesses in northwest Plano to incubate the Legacy Transportation Management Association to deploy transportation information, foster ride-sharing and consider other privately funded strategies such as shuttles to help employees get to and from work and local retailers or services (City of Plano, 2017). Figure 120 shows additional routes and services being recommended by the City of Plano to improve public transit access to the Legacy West business area (City of Plano, 2017). Mobility 2040, a regional transportation plan, includes an environmental justice assessment of the impact of building recommended transportation facilities (North Central Texas Council of Governments, 2018). The assessment indicates that access to jobs via public transit will be significantly improved for both protected and non-protected groups if projects are built as planned. Congestion will increase but far less if the mobility plan is built as recommended.

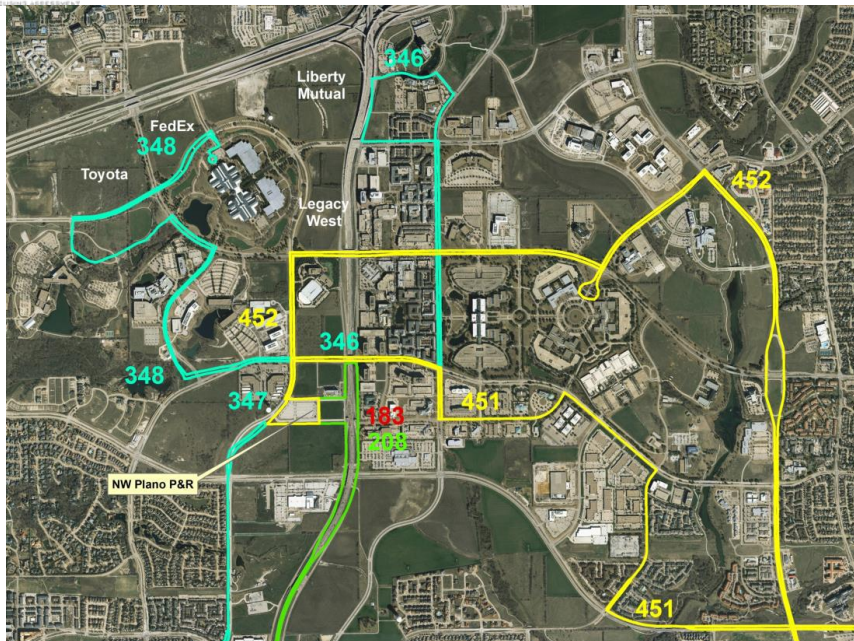


Figure 120: Suggested public transit service Legacy West business area

The City of Plano also provide reduced cost transit to Plano senior citizens with no other means of transportation through the Senior Rides program (Dallas Area Rapid Transit, 2018). The City of Plano collaborates with DART who administers the program. In FY 2015, the program provided 2,864 trips to 63 clients. In FY 2016, the program provided 3,297 trips to 67 clients. In the first quarter of 2017, the program provided 776 trips to 57 clients (Evans, Update and Next Meeting on November 2nd, 2017).

Sample comments on public transportation from Appendix:

- If my car broke then I just didn't have a car anymore.
- You only get reliable service in high-traffic areas, but other than that you get limited service and hours.
- Someone with a job that needs transportation home from work after 8 pm have no way of getting home since the bus system closes. I would love to take the bus to the train, but I can't ensure that I would be able to get home. So I have to drive to the train station.
- I walk with my children to the nearest grocery store three miles away
- I exclusively use public transportation. Plano is the largest contributor to DART after Dallas, but our buses only run every hour. The locations of stops/routes are limited. Look at the increase of jobs that have come to Plano and new routes seem to go straight to Toyota and bypass the rest of the community. Limited/no transportation offered by DART on Sunday.
- Need for trolleys or other mass transit in Legacy-121 business corridor.

d. Access to Low Poverty Neighborhoods

i

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

The Low Poverty (LP) index captures poverty in a given neighborhood. Its values are inverted and percentile ranked nationally with a range of possible values from 0 to 100. A higher score indicates less exposure to poverty in a neighborhood. The index is based on the number of residents with incomes below the federal poverty level.

In Plano, almost 14% of the Hispanic population and about 4% of the black population live in census tracts with LP index scores lower than 29 while 1% of the Asian/PI population and 2% of the white population live in the same census tracts (Figure 121). At the same time, about 67% of the Asian/PI population and over 57% of the white population live in census tracts with LP scores greater than 80 while only 44% of the black population and HCV35% of the Hispanic population live in similar census tracts. While some disparities exist between different races and ethnicities in Plano, these become more significant and pronounced at the regional level (Figure 122); furthermore, Plano significantly outperforms the region. Census tracts in the DFW region with LP index scores lower than 29 contain more than 50% of the Hispanic population, 44% of the black population and about 13% of the Asian/PI and white populations. Census tracts in the DFW region with LP scores greater than 80 contain over 41% of the Asian/PI population, over 34% of the white population and only 15% of the black and 11% of the Hispanic populations.

Families with children do not appear to be significantly disadvantaged in Plano; however, this trend does not appear as clear regionally because almost 27% of families with children live in census tracts with LP scores lower than 29. For the other protected groups, a similar trend occurs where Plano significantly outperforms the DFW region. In Plano, 32% of residents with incomes at or below 30% of area median income (ami30) live in census tracts with LP scores greater than 80 while 11% live in census tracts with LP scores lower than 29. In the region, only 9% live in census tracts with LP scores greater than 80 and over 50% live in census tracts with LP scores lower than 29. In Plano, 34% of the residents with incomes at or below 50% of the area median income (ami50) live in census tracts with LP scores greater than 80 and almost 9% live in census tracts with LP scores lower than 29. In the region, almost 12% live in census tracts with LP scores greater than 80 and over 43% live in census tracts with LP scores lower than 29. In Plano, 43% of the residents with incomes at or below 80% of the area median income (ami80) population live in census tracts with LP scores greater than 80 and almost 6% live in census tracts with LP scores lower than 29. Regionally, only 17% live in census tracts with LP scores greater than 80 and almost 34% live in census tracts with LP scores lower than 29. In Plano 42% of the limited English proficiency population live in census tracts with LP scores greater than 80 and almost 13% live in census tracts with LP scores lower than 29. In the region, only 11% live in census tracts with LP scores greater than 80 and over 53% live in census tracts with LP scores lower than 29. In Plano, almost 55% of the foreign born population live in census tracts with LP scores greater than 80 and almost 5% live in census tracts with LP scores lower than 29. In the region, only 18% of the foreign-born live in census tracts with LP scores greater than 80 and over 42% live in census tracts with LP scores lower than 29. In Plano, almost 50% of residents with disabilities live in census tracts with LP scores greater than 80 and almost 5% live in census tracts with LP scores lower than 29. Regionally, only 19% live in census tracts with LP scores greater than 80 and about 33% live in census tracts with LP scores lower than 29.

LP Scores	Number of census tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	1	0.5	1.9	5.1	0.2	3.4	2.0	1.8	3.4	1.6	0.8	1.3
10-20	2	1.6	2.8	8.7	0.9	8.1	6.8	4.1	9.5	3.9	2.1	3.5
20-29	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
30-39	4	5.5	9.3	13.8	2.1	10.2	10.6	10.3	11.1	5.9	6.1	8.8
40-49	3	2.1	4.7	10.5	2.1	6.1	7.2	4.4	9.2	5.1	3.5	3.9
50-59	4	5.1	4.2	3.9	2.1	8.2	6.0	6.1	2.4	3.7	2.8	6.3
60-69	9	11.2	16.3	10.7	9.3	17.1	18.1	15.6	10.2	10.3	10.2	11.7
70-79	11	16.5	17.0	13.0	16.4	15.3	15.6	14.9	12.0	14.9	15.6	14.7
80-89	20	27.4	21.4	18.0	27.9	18.0	17.4	23.3	20.6	24.1	26.5	27.9
90-99	22	30.2	22.6	16.5	39.0	13.5	16.5	19.5	21.6	30.5	32.3	21.9

Figure 121: Demographics of census tracts in Plano by Low Poverty index scores for protected classes (HUD, ACS 2013 and U.S. 2010 Decennial Census)

LP Scores	Number of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	126	1.9	16.5	14.6	3.0	18.5	12.4	8.0	16.5	12.6	6.9	9.0
10-20	167	5.5	16.0	22.3	5.0	20.1	18.4	14.6	24.3	18.3	11.5	13.3
20-29	122	6.0	11.8	13.4	5.4	12.2	12.5	11.2	13.1	11.6	8.5	10.5
30-39	135	9.3	10.0	10.6	6.4	10.9	12.3	11.2	10.2	9.6	9.0	10.9
40-49	119	8.9	8.0	8.4	5.6	8.6	9.3	9.9	7.5	7.2	8.1	9.8
50-59	109	9.1	7.2	5.9	6.0	7.2	8.0	9.1	5.3	5.9	7.3	8.7
60-69	127	11.5	7.1	6.4	12.1	7.4	8.2	9.6	6.1	7.9	9.4	9.4
70-79	126	13.2	8.3	6.9	14.7	6.3	7.0	9.1	6.1	8.1	11.1	9.5
80-89	157	15.5	7.4	5.9	18.7	5.3	6.5	9.0	5.6	8.9	12.6	9.2
90-99	205	18.9	7.7	5.6	23.1	3.6	5.3	8.3	5.2	9.9	15.5	9.7

Figure 122: Demographics of census tracts in NTRHA region by Low Poverty index scores for protected classes (HUD, ACS 2013 and U.S. 2010 Decennial Census)

ii.

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

According to Figure 123, Plano has limited locations with low scores on the LP index (0.0 to 20.0). The high-scoring census tracts occur in west and central Plano (indicating lower poverty). The census tract in west Plano with a moderate LP score has a high percentage of renters. The locations with low and very low index scores occur primarily east of US 75; however, a few locations with lower scores occur in central Plano. This overall pattern follows the Hispanic vs. non-Hispanic segregation figure, which indicates that poverty may have a relationship with Hispanic segregation levels in Plano.

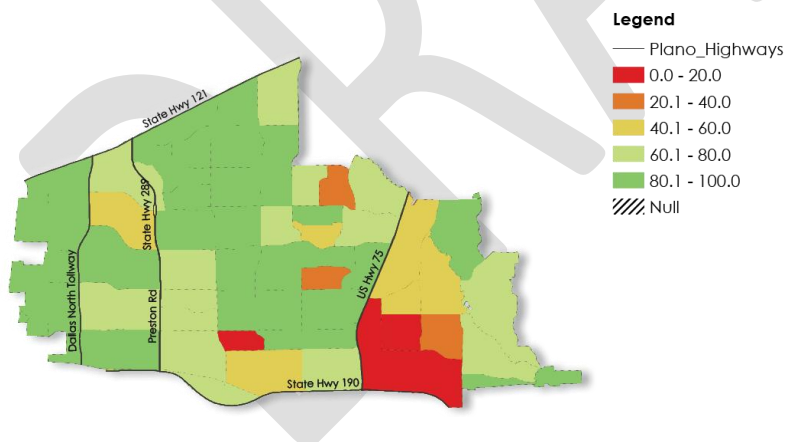


Figure 123: Low Poverty Index Map of Plano (HUD, ACS 2013)

Regionally, Figure 124 shows that the Low Poverty index has clear trends. The labor market indices for Dallas and Fort Worth show that inside their respective interstate highway system loops (I-635 and I-820) almost all of the communities have low scores. The suburban areas within the NCTCOG planning area have the highest LP scores; however, limited concentrations of low-scoring census tracts occur in most suburbs. Rural index scores appear to vary more for this index than other indices; exurban areas appear to perform above average. Rural areas east and southeast of Dallas appear to have lower scores than other rural areas.

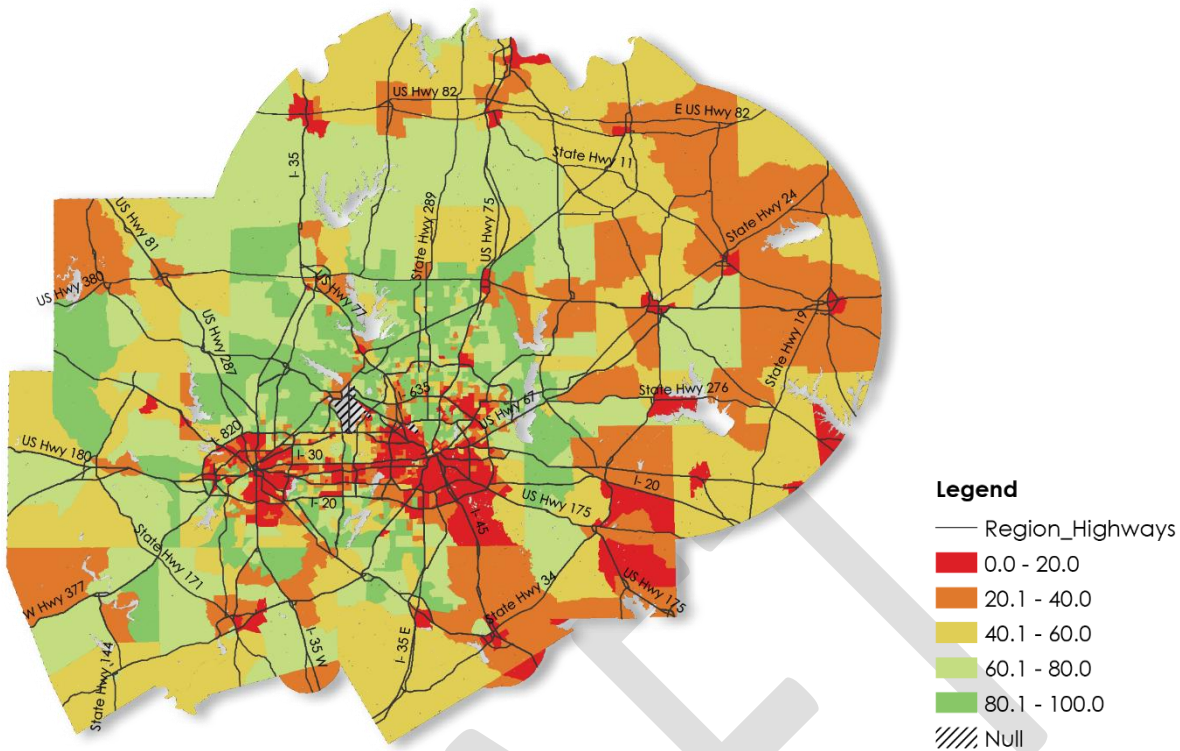


Figure 124: Low Poverty Index map of the NTRHA region (HUD, ACS 2013)

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

The Mobility Assistance Program, operated by Inclusive Communities Project (ICP), resulted from the Walker settlement and serves residents participating in the Dallas Housing Authority's Housing Choice Voucher Program. Families are assisted to use vouchers to obtain housing in lower poverty areas in seven counties, including Collin. DHA voucher holders may use their vouchers to access housing within the city of Plano. Walker Settlement Voucher holders must move to housing in a Walker Targeted Area, defined as a census tract in which the poverty rate is less than or equal to 22.3%, the black population is less than or equal to 25.7% and where no public housing is located (Inclusive Communities Project, 2013). ICP further assists DHA voucher holders to relocate in high-opportunity areas, defined as census tracts in which residents have incomes at or above 80% of the Area Median Income, no more than 10% of residents have incomes below the federal poverty rate and public schools meet the standards of the Texas Education Agency and have four-year graduation rates of 85% or higher.

The Plano Housing Authority (PHA) participates in the Small Area Fair Market Rent program. Unique Fair Market Rent (FMR) standards are set by HUD for 160 zip codes within the jurisdiction of PHA (Plano Housing Authority, 2018). FMRs range from a low of \$470 per month for an efficiency apartment in zip code 75452, Leonard, Texas (far northeast), to a high of \$1,100 for an efficiency in 16 zip codes primarily south and west (outside) of Plano, including downtown Dallas, Frisco, north Dallas and Las Colinas. Median FMR in all PHA zip codes is \$775 for an efficiency apartment. Use of vouchers in these higher opportunity communities is based on willingness of landlords to accept vouchers.

e. Access to Environmentally Healthy Neighborhoods

i

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

The Environmental Health (EH) index uses data on hazardous air pollutants that have serious health effects. It measures exposure across broad geographic areas and generates values from 0 to 100 based on a national distribution of raw scores. As the index value increases, residents experience less exposure to harmful toxins. In Plano, over 22% of the white population lives in census tracts with EH scores lower than 39 while all other vulnerable groups have at most 21% of their population living in the same census tracts (Figure 125). At the regional level (Figure 126), Plano's EH scores compare favorably. Census tracts in the DFW region with EH index scores lower than 19 contain 15% of the Hispanic population, almost 16% of the black population and about 8% of the white and Asian/PI populations. Census tracts in the DFW region with EH index scores greater than 60 contain almost 14% of the white population and about 3% of the Hispanic, black and Asian/PI populations. Families with children appear slightly worse off at the regional level than Plano; however, overall they appear better off than all other protected classes at the regional level and not much worse than the white population. The other protected groups (LEP, foreign-born and disability) experience population distributions with respect to the EH index similar to the black and Hispanic populations at the regional level.

EH Scores	Number of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% income < 30% AMI	% income 30-49% AMI	% income 50-80% AMI	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-19	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
20-29	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
30-39	9	22.1	15.4	12.3	18.8	20.6	16.9	15.6	14.8	18.1	20.4	18.5
40-49	27	59.7	60.5	70.3	62.6	60.7	60.9	65.0	73.0	63.8	61.9	65.4
50-59	6	18.1	24.1	17.4	18.5	18.7	22.3	19.4	12.3	18.0	17.6	16.1
60-69	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
70-79	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
80-89	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
90-99	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Figure 125: Plano demographics by Environmental Health index scores (HUD, NATA 2011, 2010 Census)

EH Scores	Number of Census Tracts	% White	% Black	% Hispanic	% Asian/PI	% AMI30	% AMI50	% AMI80	% LEP	% Foreign Born	% Families with Children	% Disability
0-9	16	1.5	2.7	1.4	1.6	2.6	1.9	1.7	1.1	1.2	1.5	1.9
10-19	91	6.9	13.1	13.6	6.3	13.6	12.4	10.6	13.4	12.6	9.1	10.2
20-29	267	25.1	27.6	29.8	26.9	30.9	29.8	29.4	32.2	29.7	26.6	26.6
30-39	254	24.8	27.5	28.8	27.7	26.9	26.9	26.7	28.6	28.9	27.6	25.2
40-49	144	19.0	16.4	15.8	25.3	13.0	14.9	15.9	15.5	17.4	18.2	16.3
50-59	63	8.5	10.0	6.9	9.3	6.6	6.7	7.9	6.7	7.2	8.9	8.2
60-69	50	11.1	2.2	3.3	2.6	5.1	5.6	6.2	2.1	2.6	6.6	9.1
70-79	20	3.0	0.5	0.5	0.3	1.4	1.7	1.6	0.3	0.4	1.5	2.5
80-89	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
90-99	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Figure 126: Environmental Health index of protected groups NTRHA region, (HUD, NATA 2011, 2010 Census)

iii

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

Mobility 2040, a regional transportation plan, includes an environmental justice assessment of the impact of building recommended transportation facilities (North Central Texas Council of Governments, 2018). The assessment indicates that access to jobs via public transit will be significantly improved for both protected and non-protected groups if projects are built as planned. Congestion will increase but far less if the mobility plan is built as recommended. Neighborhoods with the lowest scores on the environmental hazard index are located adjacent to major highways and heavy traffic areas, with automobile transportation contributing to poor air quality. Reductions in congestion can improve air quality. The North Texas region has a higher prevalence of adult asthma (7.9%) than Texas as a whole (6.8%) (Texas Department of State Health Services, 2012).

The City of Plano's Environmental Health program receives complaints from citizens regarding environmental hazards and monitors businesses with potentially negative environmental impact (Dingman, 2017). Southeast Plano is home to industrial manufacturers that are regularly monitored for their impact on storm water systems.

f. Patterns in Disparities in Access to Opportunities

i

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

HUD's Table 12, displayed in Figure 129, provides insight into the impact of location on opportunity by race and ethnicity.

- Hispanic residents live in neighborhoods with the highest poverty, the least access to proficient schools and the lowest labor force participation. Hispanic residents are spatially concentrated in east McKinney near interstate highways in areas with higher poverty and schools with lower performance. Spatial concentrations of Hispanic residents coincide strongly with low scores on the Labor Market Engagement Index and Low Poverty Index.
- Transit index scores are low to moderate for all races and ethnicities (49 to 50) and slightly higher than the region.
- Regional indices for neighborhoods where black residents live are very low (39) for school proficiency. School proficiency scores are significantly higher in McKinney (59 to 80) for all races and ethnicities than in the region (40 to 62).
- Families living below the poverty line have significantly lower index scores for low poverty, school proficiency and labor market engagement than does the general population in McKinney. Poor families tend to be more concentrated in higher poverty communities with lower performing schools.

At the regional level, spatial patterns of regional segregation and R/ECAP locations match the locations with lower School Proficiency, Labor Market Engagement and Low Poverty index scores.

(Plano, TX CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	75.76	72.93	86.93	48.94	62.57	51.49	39.77
Black, Non-Hispanic	68.41	67.62	83.81	49.62	66.10	53.34	41.08
Hispanic	57.41	58.57	77.33	50.41	68.15	54.75	40.49
Asian or Pacific Islander, Non-Hispanic	81.04	79.64	90.76	49.27	60.33	48.68	40.77
Native American, Non-Hispanic	72.11	69.92	85.13	49.62	63.49	50.25	40.38
Population below federal poverty line							
White, Non-Hispanic	67.50	69.85	84.23	50.53	67.23	51.25	41.40
Black, Non-Hispanic	53.24	48.58	72.59	49.72	69.74	55.69	40.90
Hispanic	43.05	53.42	73.46	50.13	72.55	62.87	39.68
Asian or Pacific Islander, Non-Hispanic	71.33	72.81	87.23	49.26	64.28	53.69	39.45
Native American, Non-Hispanic	80.47	65.88	85.96	48.41	68.12	42.75	43.59
(Dallas-Fort Worth-Arlington, TX) Region							
Total Population							
White, Non-Hispanic	64.62	60.86	67.57	42.14	51.91	50.10	33.02
Black, Non-Hispanic	40.78	40.39	47.59	48.17	60.55	44.28	29.40
Hispanic	37.25	41.24	45.75	48.70	61.74	47.18	29.86
Asian or Pacific Islander, Non-Hispanic	66.83	61.68	74.36	48.94	60.65	48.35	33.45
Native American, Non-Hispanic	56.41	54.36	59.73	43.05	53.41	49.43	32.51
Population below federal poverty line							
White, Non-Hispanic	48.24	50.43	53.86	44.63	57.02	52.01	31.42
Black, Non-Hispanic	24.15	33.32	33.43	51.04	65.56	45.27	27.00
Hispanic	25.63	37.16	38.58	51.35	65.99	48.95	28.30
Asian or Pacific Islander, Non-Hispanic	51.26	52.34	60.78	52.22	67.80	51.48	30.06
Native American, Non-Hispanic	35.38	43.07	43.31	46.44	60.60	55.88	29.75

Figure 129: Opportunity Indicators, by Race/Ethnicity in Plano and the Region (HUD AFH Table 12)

ii

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

Western and central Plano consistently receive higher scores for many opportunity indices. After adding the School Proficiency Index to the analysis the areas with the strongest aggregate access to opportunity are in west and north Plano. For Plano, low access to opportunity across multiple indicators occurs in east Plano near US 75. This area has the lowest Labor Market Engagement Index and Low Poverty Index scores.

At the regional level, the suburbs outperform Dallas and Fort Worth across the indices; however, most suburbs have isolated pockets of lower performance for the Labor Market Engagement Index and Low Poverty Index scores. Suburbs and edge cities have higher scores on the School Proficiency Index than do the central cities of Dallas and Fort Worth.

2. Additional Information

a

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

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

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

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

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

b.

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

The City of Plano is actively addressing the lack of affordable housing, the primary barrier to access to opportunity in its community. The Department of Neighborhood Services has retained expert assistance to prepare a Housing Trends Analysis and Strategic Plan that will “develop policies and strategies that can be employed to create incentives for the private and public sectors to fill in gaps in the housing market through new development and redevelopment” (City of Plano, 2017). This study follows the City's Housing Value Retention Analysis to determine strategies to maintain the quality of its housing and surrounding neighborhoods (Catalyst Commercial, Inc., 2014) and a comprehensive housing study (City of Plano, 2015).

The City's history of single-family development, its strong economy and hot housing market have left it faced with challenges to housing affordability:

- Residentially zoned land is largely built out. Only 581 of 2,778 remaining undeveloped acres are residentially zoned (City of Plano, 2017).
- Of its 111,622 housing units, 66% are single family and 31% are multifamily, constraining the availability of rental housing for lower income families (City of Plano, 2017). Figure 130 displays the number of housing units in Plano by type as of January 2017. Forty-two percent of renters spend more than 30% of their income on housing and utilities (City of Plano, 2017).

HOUSING TYPE	NUMBER OF UNITS	PERCENT OF TOTAL
Single-family detached	68,552	62%
Single-family attached	3,967	4%
Duplex	493	0%*
Mixed-use single-family	297	0%*
Total Single-Family	73,309	66%
Traditional multifamily	26,398	24%
Mixed-use multifamily	7,663	7%
Mid-rise (5 stories or higher)	460	0%*
Total Multifamily	34,521	31%
Other**	3,792	3%
TOTAL	111,622	100%

*Percentage totals are rounded up or down to the nearest whole number. Percentages less than 0.5% were rounded down to 0%.

**Other represents recreational vehicles, mobile homes, and retirement housing including independent living facilities, assisted living facilities, and long term care facilities.

Figure 130: Existing Housing Units Jan. 1, 2017 by type (City of Plano: Planning Department)

- Most major new developments are in northwest Plano and target the development of employment centers (e.g., Toyota, Legacy West (north), JP Morgan Chase, Liberty Mutual). According to the Plano Tomorrow Undeveloped Land Policy, “Plano will reserve its remaining undeveloped land for high-quality development with distinctive character, emphasizing businesses offering highly skilled employment and limiting housing and retail uses except when integrated in compact complete centers to ensure adequate land for projected employment growth” (City of Plano, 2017). Figure 131 displays new apartment projects completed in Plano in 2017 (MPF Research, 2017). Eighty percent are located in high-income west Plano (zip codes 75024, 75093), and all projects are conventional market-rate apartments. Apartment rents for new projects in lower income east Plano start at \$937 for 549 square feet (75074) in the downtown Plano TIF and \$1,331 for 750 square feet west of US 75 (75075) (CoStar Group, Inc., 2018; CoStar Group, Inc., 2018).

2017 New Plano Apartment Projects	Zip Code	# of Units
Park at Gateway	75024	255
Huntington	75024	320
LVL 29	75024	328
Palladium at Legacy West	75024	312
The Residences at Legacy	75024	300
14th Street & K Avenue	75074	175
Bridge at Heritage Creek	75075	326
Broadstone Evoke	75093	459
Total		2,475

Figure 131: New apartments completed in Plano, 2017

- Average apartment occupancy in Plano was approximately 96% for the past five years, ranking in the top 11 of Dallas-Fort Worth submarkets. Plano rents increased approximately 23% from 2012 to 2017, ranking 13 of 32 Dallas-Fort Worth submarkets (MPF Research, 2017). Rents averaged \$1,195 per month in central and east Plano during the third quarter of 2017 and \$1,292 per month in west Plano.
- Requests for zoning changes for multifamily projects in 2017 were limited and resulted in one patio home project, one multifamily project and one mixed-use project. Eight projects were denied or are waiting for review (City of Plano, 2017).

Plano is on a path to slightly increase the percentage of multifamily and rental housing available. Figure 132 shows current Plano residential projects under development. Current developments emphasize multifamily housing (City of Plano, 2017). Eighty-four percent of residential units under development are multifamily and include one independent living facility for senior citizens. If all projected and possible housing units are built within Plano's current goal framework and zoning, the percent of residential units that are multifamily will increase to 32% and single-family housing will decrease to 60% of total residential units (City of Plano, 2017).

Plano Residential Units in Progress 2017	Zip Code	# Multifamily Units	# Single-family Units
Legacy West (South)	75024	621	126
TCC Legacy Kincaid	75024	316	
Commodore Mixed-Use	75024	500	60
Villages of Prairie Commons (West)	75024		178
Plano Arts	75074	220	
Southern Land Phase 2	75074	184	
Plano Marine	75074	385	
Heritage Creekside	75075	320	146
South Mapleshade Addition (Independent Living Facility)	75075	180	
Total		2,726	510

Figure 132: Plano residential units zoned, pending approval, under construction/pending construction

Single-family housing currently under development does not contribute significantly to greater affordability with home prices starting at \$308,990 in south central Plano (75075) (Rosewood Property Company, 2018). Figure 133 shows median Plano home prices by zip code, ranging from \$252,500 in older east Plano to \$434,500 in southwest Plano (Zillow, 2018). While older homes in east Plano are available at lower prices, public participants stated that the high cost of renovation and maintenance, along with less desirable neighborhoods, make older homes a poor option for lower income families. Participants stated that affordable opportunities are needed for both home ownership and rental housing.

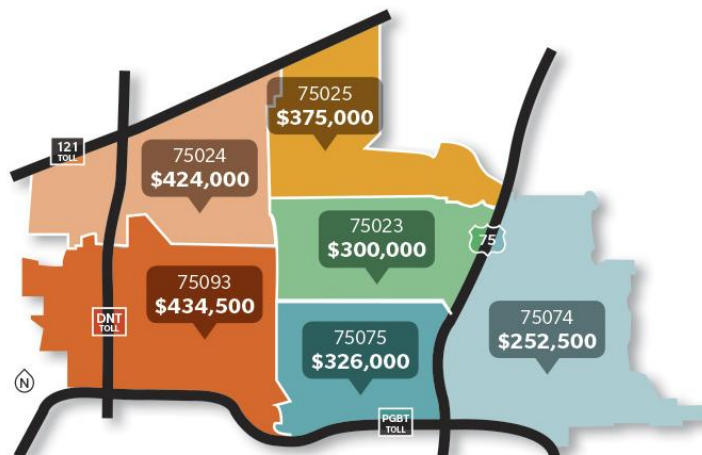


Figure 133: Plano median home values by zip code

Participants in public meetings and focus groups said that Plano needs more creative options for housing to provide greater affordability and meet special needs, including one-story (smaller and more accessible homes), low and moderately priced homes, tiny homes, housing incorporating universal design and housing for persons who are homeless (emergency shelters,

etc.). The City of Plano already has a variety of tools and assets to generate greater variety and affordability of housing options:

- **Smaller home sizes:** The City of Plano zoning ordinance allows for a minimum floor area per dwelling unit for single-family, patio homes and duplexes of only 800 square feet on lots as small as 3,000 square feet allowing for the construction of smaller homes. The City offers zoning for patio homes, duplexes, multifamily, mixed-use and mid-rise multifamily districts that all exceed eight units per acre, increasing affordability and the possibility of rental housing. Zoning allows the possibility of mixed-use live/work space at a minimum of 700 square feet (City of Plano, 2018).
- **Universal design:** The City of Plano promotes the use of universal design to ensure that dwelling units are accessible to all potential users regardless of physical ability (City of Plano, 2018). The City website offers sources of technical assistance and financial support for construction or rehabilitation.
- **Shared housing:** The City of Plano allows for up to four unrelated adults to be considered as a household for purposes of residence in a single dwelling unit (City of Plano, 2018). Up to eight persons with special needs (Household Care Facility) may live together in a single dwelling unit as a household with no more than two caregivers (ZC 2009-09 & 2004-15).
- **Accessory dwelling units:** The Planning Department is conducting research into the development of an accessory dwelling unit ("backyard cottage") policy to allow for expanding residential unit supply in single-family zoning districts (Day, 2017).
- **Opportunities for redevelopment:** The City's Comprehensive Plan builds on the findings of the Housing Value Retention Analysis to propose redevelopment of aging and underperforming neighborhood retail centers, including the following goals, many of which are in progress:
 - Create the Neighborhood Mixed-Use zoning district and establish regulations and standards for residential mixed-use development.
 - Develop a Parker Road Corridor Plan to encourage cooperative redevelopment of retail sites, increase housing options and identify opportunities.
- **Development incentives:** The City of Plano has established an NEZ and a TIF covering an area in central/east Plano around the historic downtown. These programs offer financial incentives that can be used to support the creation or rehabilitation of affordable housing.

The City of Plano has been concerned with the availability of affordable housing and neighborhood revitalization and sustainability for many years. The Transition and Revitalization Commission (TRC) was established in 2006 to address workforce housing issues (housing for workers between 80% and 120% of area median income, including nurses, firefighters, police, etc.) (City of Plano Long Range Planning Department, 2006). The TRC report identified significant deficits and barriers to workforce housing and suggested many strategies, including establishing a Housing Trust Fund to provide rehabilitation and down payment funding for workforce housing to help workers purchase older homes and live in Plano. The City's Urban Centers Study seeks opportunities to improve the quality of small, local commercial centers to improve use of public infrastructure and delivery of public services to adjacent communities and create sustainable development (City of Plano, 2012). The Parker Road Station and the Collin Creek Corridor, both adjacent to US 75, were identified as best suited for urban center development.

3. Contributing Factors of Disparities in Access to Opportunity

The primary contributing factors of disparities in access to opportunity can be summarized as follows (see more detailed discussions under previous sections):

High housing costs and the location and type of affordable housing: Housing costs are rapidly rising in Collin County and the City of Plano and exceed the capacity of workers in many fields to affordably live in Plano. Lower cost housing tends to be concentrated in areas of higher poverty with lower performing schools and higher rates of non-white residents. The Federal Reserve Bank of Dallas has identified housing affordability as one of the biggest economic issues in the region, driven by in-migration and rising costs of land and labor (Ash, 2018). The Dallas-Fort Worth metropolitan area is second in the nation in total net migration from 2011 to 2014 and 38% of population growth was due to domestic in-migration (Assanie, Davis, Orrenius, & Weiss, 2016). Figure 134 displays the percent of homes sold in the Dallas-Plano-Irving area (blue line) that would have been affordable to a family earning the median income for the area (Housing Opportunity Index). The percent of affordable homes in the Dallas-Plano-Irving area decreased from a high of 80% in 2010 to a low of 46.9% in 2017. The Dallas-Plano-Irving HOI was nearly 20 percentage points lower than the US national HOI in the first quarter of 2018.

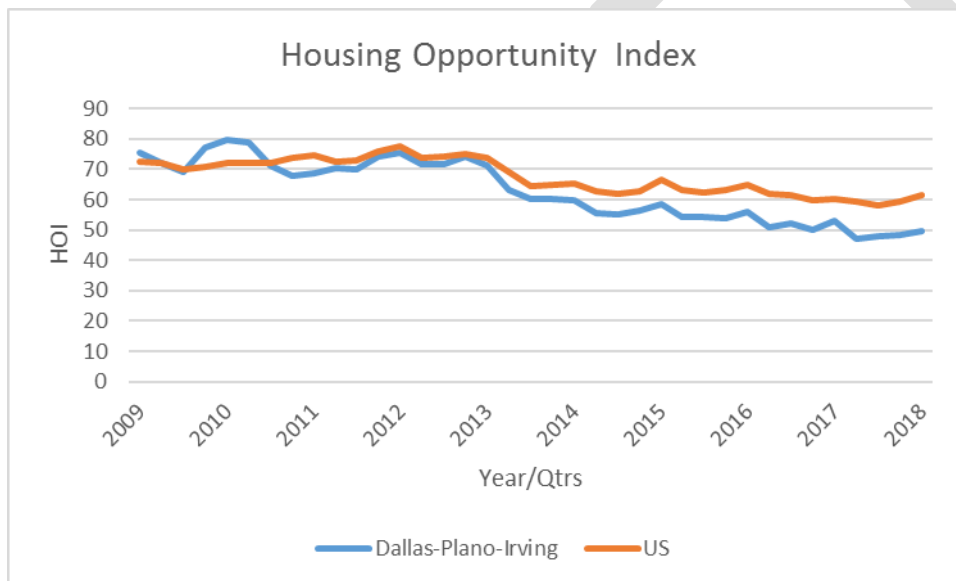


Figure 134: Percent of homes sold affordable to family earning area median income (National Association of Homebuilder, 2018))

Lack of public and private investment in certain neighborhoods: Lower income residents tend to be concentrated in older neighborhoods with less access to modern amenities. Residents commented that older, poorer neighborhoods lack high-quality children's playgrounds, parks, walking trails, dog parks, public pools, libraries and civic centers with a variety of low-cost activities. Other comments identified needs for repairs to streets, walkways and sewers. A significant number of comments were received regarding the need for improved safety and decreased crime, including needed investments in lighting, especially in parks and alleys. Representatives of Inclusive Communities Project stated that their clients choose to move out of higher poverty, historically segregated neighborhoods to seek safer environments for their children. Residents stated that older neighborhoods with smaller homes and lower incomes could no longer attract and retain quality retail, especially grocery stores.

Availability, type, frequency and reliability of public transportation: Transportation is an important connector to opportunity, including jobs. According to participant comments, Plano lacks sufficient public transit to connect residents and employees to affordable housing, good jobs, retail and other services.

Location of employers: While Plano offers strong job growth and high-quality jobs, lower wage jobs increase at faster rates than higher wage jobs. Employers are not located within easy reach of housing affordable to support and service workers.

Location of proficient schools and school assignment policies: Children in Plano must largely attend the public school near where they live. Schools in lower income communities have significantly lower academic outcomes than in higher income communities of Plano.

Need for creative zoning and land use policies: Participants in public engagement were unaware that Plano has zoning policies that allow for smaller dwellings and other creative strategies to increase housing affordability. City of Plano staff express the need for more tools to incentivize the development of affordable housing.

iv. Disproportionate Housing Needs

1. Analysis

a

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

Figure 135 shows the percentage of racial and ethnic groups experiencing one of four housing problems: housing cost burden (defined as paying more than 30% of income for monthly housing costs, including utilities), overcrowding (more than one person per room), lacking a complete kitchen or lacking plumbing. Figure 135 has an additional section, severe housing problems, that replaces regular (over 30%) cost burden with severe (50%) cost burden, or paying more than 50% of income on housing and utilities.

	(Plano, TX CDBG, HOME) Jurisdiction			(Dallas-Fort Worth-Arlington, TX) Region		
Households w/housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	17,845	64,780	27.55%	360,875	1,348,425	26.76%
Black, Non-Hispanic	2,785	7,170	38.84%	165,008	362,115	45.57%
Hispanic	4,940	10,460	47.23%	230,317	466,931	49.33%
Asian or Pacific Islander, Non-Hispanic	3,555	15,620	22.76%	37,039	114,143	32.45%
Native American, Non-Hispanic	113	408	27.70%	2,352	7,647	30.76%
Other, Non-Hispanic	465	1,700	27.35%	12,863	34,357	37.44%
Total	29,700	100,135	29.66%	808,445	2,333,530	34.64%
Household Type and Size						
Family households, <5 people	15,050	62,430	24.11%	375,730	1,337,021	28.10%
Family households, 5+ people	3,485	9,160	38.05%	142,804	283,318	50.40%
Non-family households	11,175	28,550	39.14%	289,900	713,190	40.65%
Households w/Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	7,940	64,780	12.26%	166,886	1,348,425	12.38%
Black, Non-Hispanic	1,195	7,170	16.67%	88,173	362,115	24.35%
Hispanic	2,825	10,460	27.01%	138,278	466,931	29.61%
Asian or Pacific Islander, Non-Hispanic	1,925	15,620	12.32%	21,545	114,143	18.88%
Native American, Non-Hispanic	54	408	13.24%	1,307	7,647	17.09%
Other, Non-Hispanic	254	1,700	14.94%	6,805	34,357	19.81%
Total	14,200	100,135	14.18%	422,970	2,333,530	18.13%

Figure 135: Demographics of households with disproportionate housing needs (HUD Table 9, CHAS 2013)

Nearly 30% of Plano households suffer at least one housing problem while at the regional level almost 35% of households experience a housing problem. The Hispanic households in Plano appear disproportionately impacted by housing problems, with 47% of Hispanic households experiencing housing problems, which is slightly less than the regional value of 49%. Black households in Plano have the second highest rate at about 39%, but this rate is lower than the regional rate of 46%. White households in Plano experience housing problems at about the same rate (28-27%) as white households throughout the region. Finally, Asian/PI households and other, non-Hispanic households both experience significantly lower housing problem rates in Plano when compared to the DFW region.

In Plano, non-family households experience a rate (39%) of housing problems comparable to the regional rate of over 40%. Both types of family households experience fewer housing problems than at the regional level; only 38% of Plano-based family households with five or more members face housing problems while 50% of these households encounter housing problems in the DFW region. Only about 24% of small family households encounter housing problems in Plano while 28% of families this size encounter housing problems in the DFW region.

As before with housing problems, severe housing problems occur in 14% of Plano households while at the regional level over 18% of households experience a severe housing problem. Plano's Hispanic (27%), black (17%), Asian/PI (12%), Native American (13%) and other (15%) households experience severe housing problems less frequently than their overall regional rates (30%, 24%, 19%, 17%, 20%, respectively). Severe housing problems for white households in Plano happen at about the same rate as the region (12%).

Plano severe cost burden by race/ethnicity/family size

Figure 136 presents households suffering from severe housing cost burden, which is paying more than 50% of income for monthly housing costs, including utilities. In 2013, around 12% of Plano households experienced severe housing cost burden, which remains slightly below the regional rate of 14%. The white population experiences similar rates (about 11%) of severe housing cost burden in both Plano and the rest of the region. While the Hispanic population experiences severe cost burdens in Plano (18%) at a rate slightly higher than the region (17%), the remaining races/ethnicities experience lower rates of severe housing cost burden in Plano. Black and Asian/PI households experience severe housing cost burdens at rates (15%, 8%), lower than in the region (21%, 13%). In Plano, non-family households experience the highest rate of severe cost burden by household type at over 17%, significantly more than either of the family household groups within Plano. Plano families experience severe housing cost burdens at rates comparable but slightly below the regional rates.

Households with Severe Housing Cost Burden	(Plano, TX CDBG, HOME) Jurisdiction			(Dallas-Fort Worth-Arlington, TX) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	7,260	64,780	11.21%	144,430	1,348,425	10.71%
Black, Non-Hispanic	1,100	7,170	15.34%	75,740	362,115	20.92%
Hispanic	1,895	10,460	18.12%	77,640	466,931	16.63%
Asian or Pacific Islander, Non-Hispanic	1,270	15,620	8.13%	15,308	114,143	13.41%
Native American, Non-Hispanic	55	408	13.48%	995	7,647	13.01%
Other, Non-Hispanic	215	1,700	12.65%	5,784	34,357	16.83%
Total	11,795	100,135	11.78%	319,897	2,333,530	13.71%
Household Type and Size						
Family households, <5 people	5,860	62,430	9.39%	146,930	1,337,021	10.99%
Family households, 5+ people	979	9,160	10.69%	34,145	283,318	12.05%
Non-family households	4,955	28,550	17.36%	138,818	713,190	19.46%

Figure 136: Plano and DFW Region Severe Housing Cost Burden Household Demographics (HUD Table 10, CHAS 2013)

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

Locating Plano's Housing Problems by Race

The overall rate of households reporting housing problems in Plano by census tract ranged from 14% to 51% as of 2013. Most census tracts in the city have housing problem reporting rates between 20% and 40%; these primarily occur in western, central (except for some higher performing census tracts), and far eastern Plano (Figure 137). Housing problems vary significantly by race and ethnicity. In most census tracts in Plano, 20%-80% of Hispanic households report housing problems. In four Plano census tracts, located between SH 289 and US 75, 80%-100% of the black households report experiencing housing problems. Eighty percent to 100% of Asian/PI households report housing problems in three census tracts in south and west Plano. The overall housing problem map matches closely with the spatial distribution of the Low Poverty Index.



Figure 137: Housing problems in Plano by race and ethnicity (CHAS 2013)

Locating the region's housing problems by race/ethnicity

On the whole, housing problems prevail in and around the region's two hubs, Dallas and Fort Worth. Both cities feature large areas where the populace experiences housing problems at a rate of at least 40% (Figure 138). These occur throughout Dallas (except north Dallas), southeast Fort Worth, northwest Fort Worth (inside I-820), Irving, Garland near I-635 and Arlington and Grand Prairie between I-30 and I-20. Many clusters of census tracts in each city exist where more than 60% of the population suffer at least one housing problem and also feature several R/ECAPs.

Minority households seem to be far more likely than white households to suffer housing problems in the region's rural and suburban areas (Figure 139). While the non-white populations in some of these areas may be relatively small, those present often incur extremely high rates of housing problems. Large proportions of the white population only appear to suffer housing problems in a few isolated census tracts while the intensity of housing problems for other races and ethnicities appear far more frequently and spatially. Another aspect of the problem may be the emergence of struggling enclaves, with lower living standards than their surrounding neighborhoods.

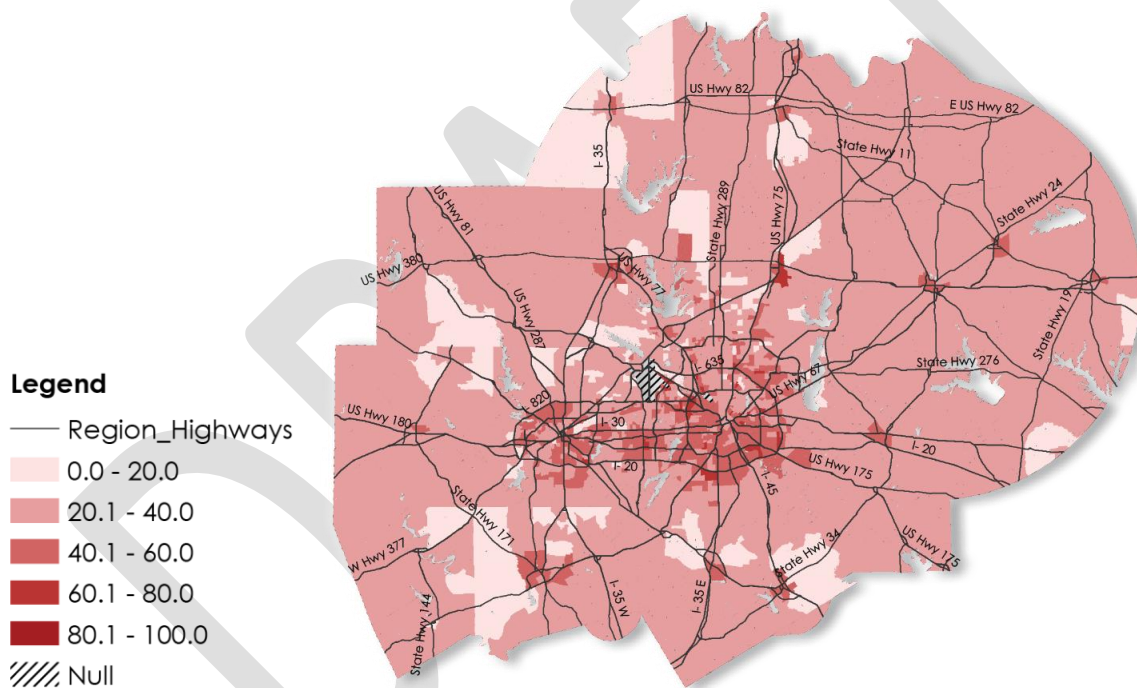


Figure 138 : Overall Housing Problems throughout the Region (CHAS 2013)

Comparing Plano and the Region, Housing Problems

To some extent Plano typifies the issue described above. Though the percentage of households experiencing housing problems in the City remains lower than in the region overall, portions of Plano east of US 75 suffer high rates of housing problems. Hispanics concentrate in these census tracts. In addition to experiencing housing problems in areas with a concentration of non-white individuals, each group tends to experience housing problems in locations where the white population does not. This occurs in Plano, where black, Hispanic and Asian/PI households suffer some high rates of housing problems in central and western Plano; these occur throughout Plano for Hispanics and blacks. Asian/PI households with problems tend to reside in southern and eastern Plano.

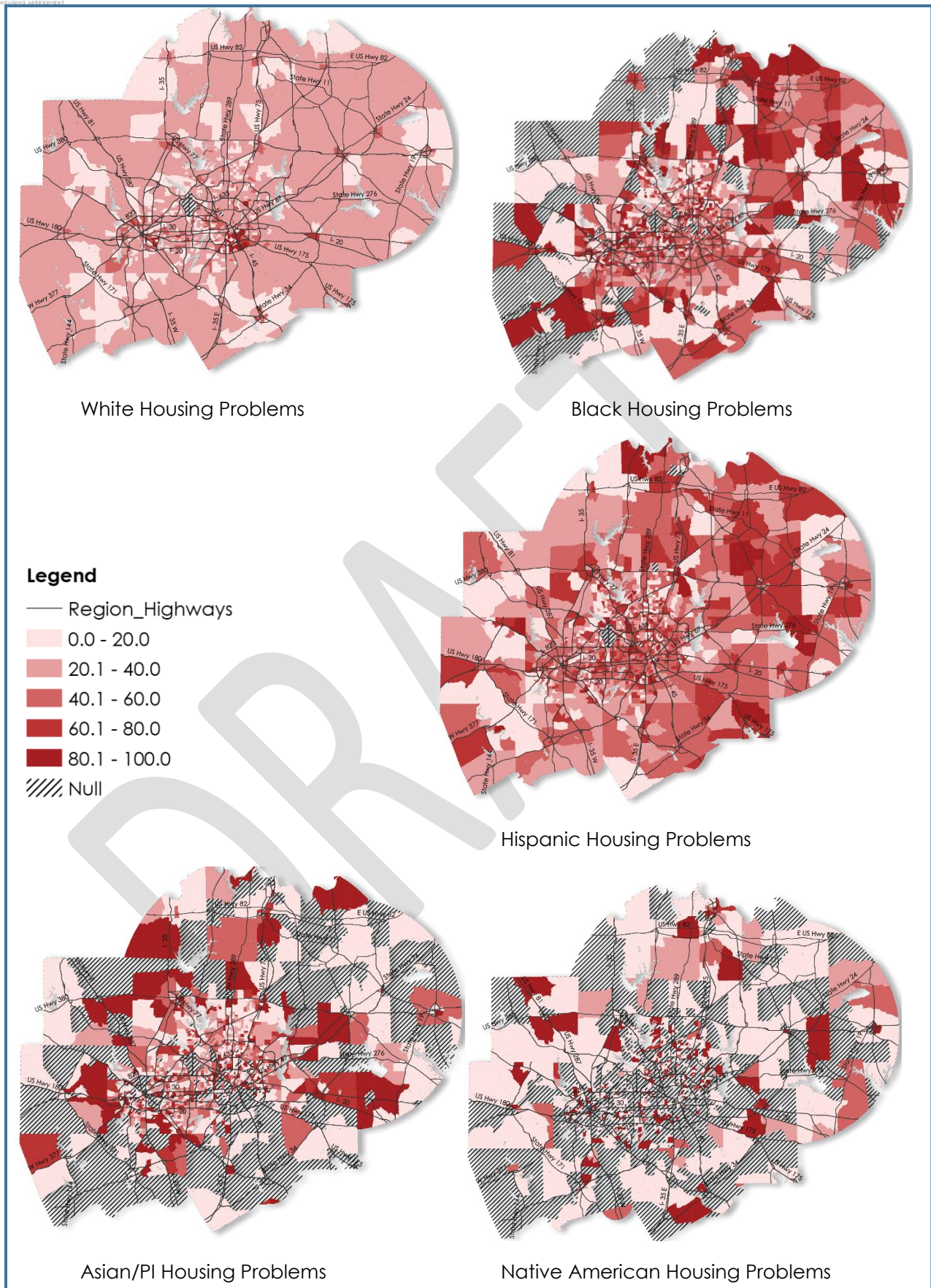


Figure 139: Housing Problems by Race/Ethnicity throughout the region (CHAS 2013)

Locating Severe Cost Burden by Race/Ethnicity in Plano

As of 2013, 12% of households in Plano report spending more than 50% of their income on housing and utilities (severe housing cost burden). In Plano, only two census tracts record severe housing burdens in more than 20% of their households; these occur in south central Plano east of Coit Road (Figure 140). In one census tract near Russell Creek Park, 80.1%-100% of black households report severe cost burden. In west and central Plano, all minorities experience some concentrations of severe cost burdens. The most segregated areas of east Plano present a greater proportion of severe housing burdens for all observed races and ethnicities. On the whole, minority households experience relatively high rates of severe cost burden where few white households pay over 50% of income toward housing costs.

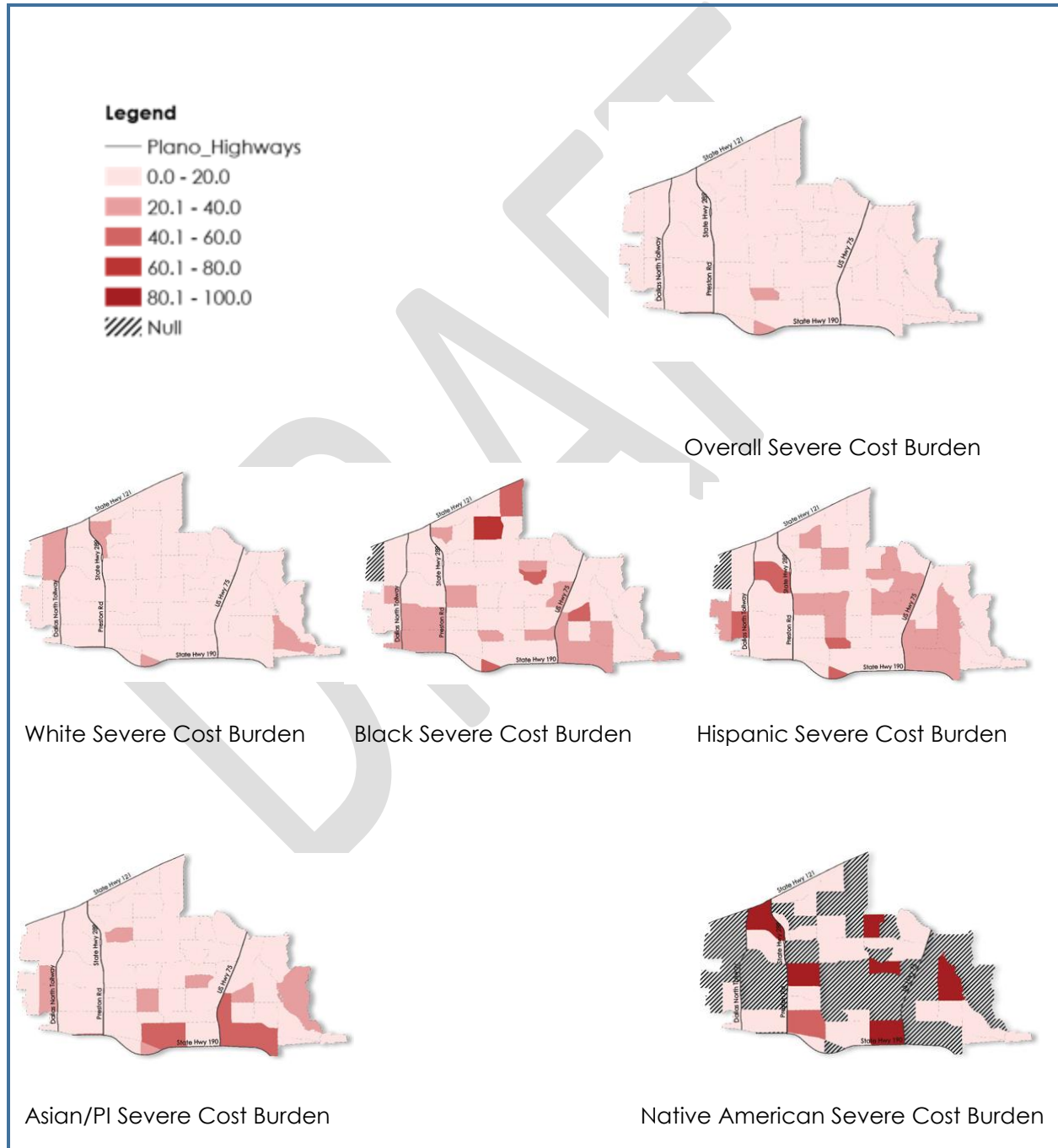


Figure 140: Severe Cost Burden by Race/Ethnicity in Plano (CHAS 2013)

Looking at the population as a whole, the largest concentrations of severe cost burden appear in south and east Dallas and southeast Fort Worth (Figure 141). Other, smaller concentrations appear in south Denton, east McKinney, southeast Irving and other southern suburbs in Dallas and Tarrant Counties. The white population faces concentrations of severe cost burden in isolated cases, which often mirror the overall spatial distribution. Several outlying areas feature high levels of severe cost burden for some of the region's minority populations, which repeat the pattern evident for housing problems. While the black population remains less spatially distributed than the white and Hispanic population, it frequently experiences concentrations of severe cost burdens throughout the study region. High percentages of the black population scattered in the region's northeast corner pay over 50% of income toward housing costs, for instance. The Hispanic population has the same wide spatial distribution of severe cost burdens as the white population, but it experiences greater concentrations of severe cost burdens. These concentrations appear particularly strong near areas with high access to opportunities. Asian/Pacific Islander households tend to experience severe cost burdens in areas with or near greater access to opportunities.

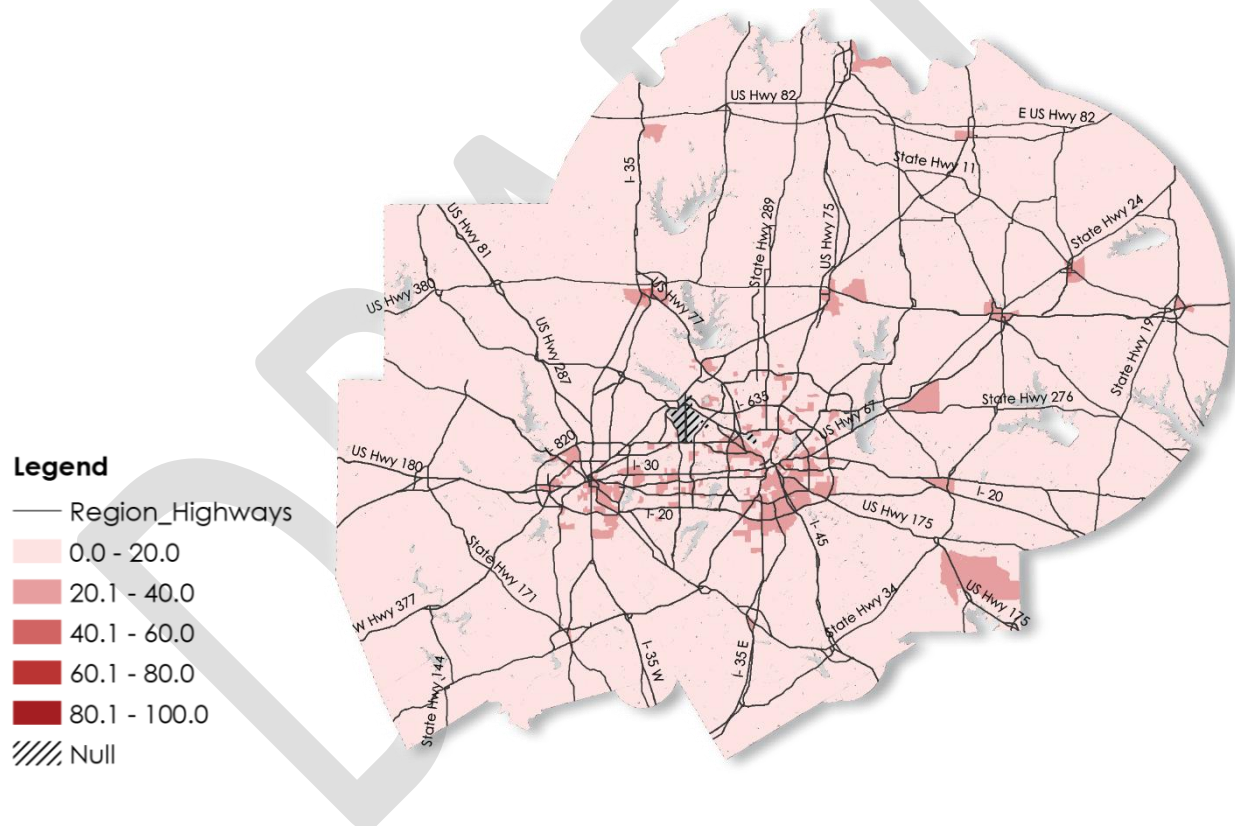
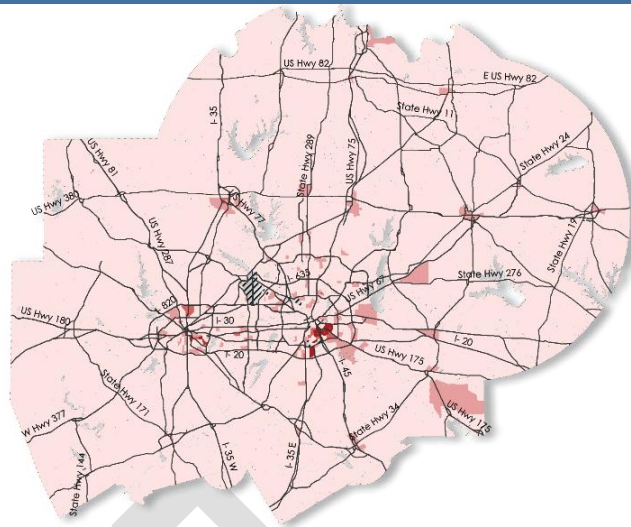
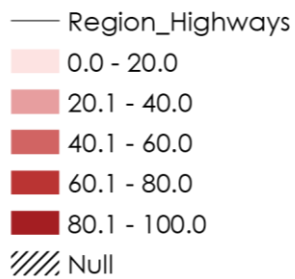


Figure 141: Overall Severe Cost Burden throughout the Region (CHAS 2013)

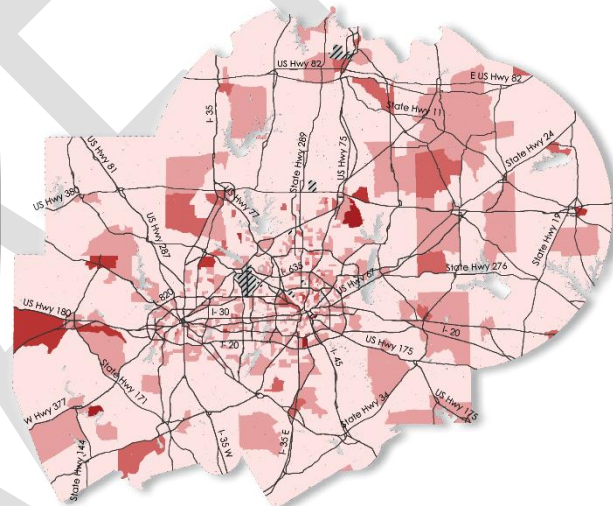
Legend



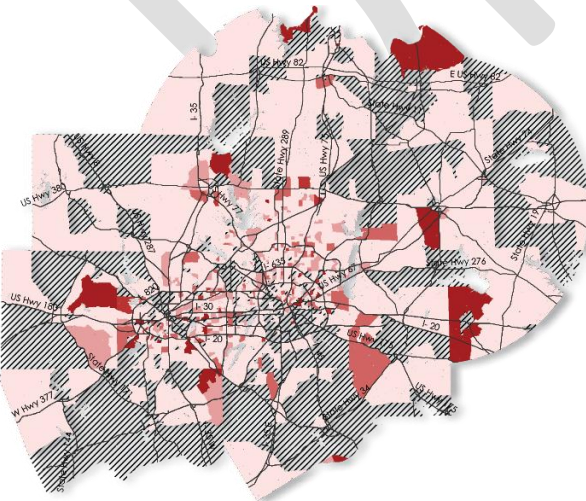
White Severe Cost Burden



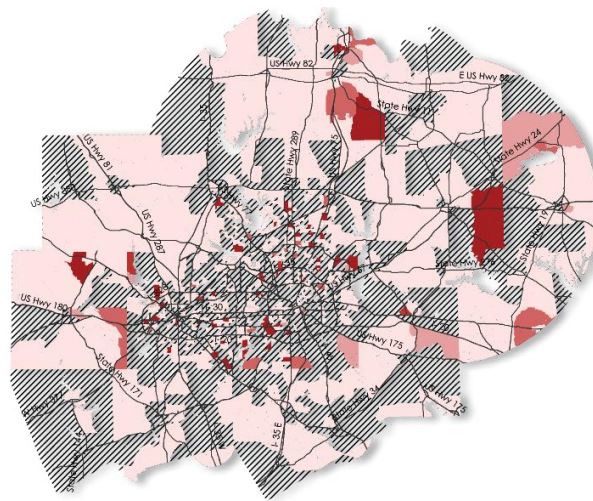
Black Severe Cost Burden



Hispanic Severe Cost Burden



Asian/PI Severe Cost Burden



Native American Severe Cost Burden

Comparing Plano and the Region, Severe Cost Burden

Like most of the northern suburbs, Plano experiences little overall concentration of severe cost burdens in census tracts. At the same time, the minority populations appear to experience pockets of concentrated severe cost burdens throughout the City. At times, these locations possess high access to opportunities, and in other cases, the locations provide much lower access to opportunities due to school proficiency or concentrations of poverty. This shows that even in areas with stronger labor markets, the minority populations experience greater risk of severe housing burdens and concentration into enclaves. This closely matches the findings for cost burdens.

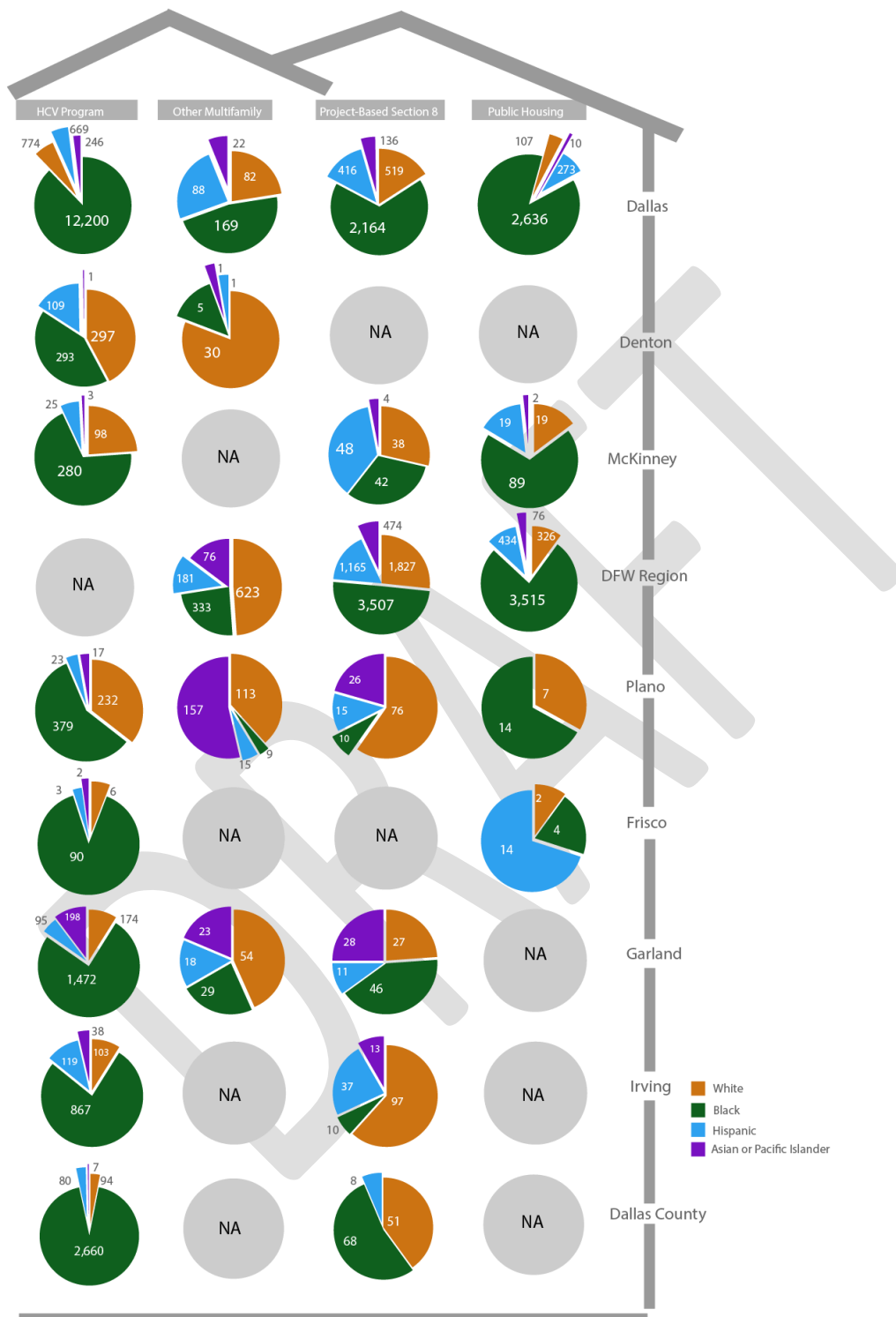
C.

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

Figure 142 displays the number of households reporting housing problems (2012 US Census, CHAS data) by household size. Over 15,000 households with less than 5 people and 3,485 households with 5 or more people reported housing problems in Plano, including paying over 30% for housing and utilities. Low income families are largely served by PHA's small (24 units) public housing program and its HCV program. Plano's public housing program consists of single family homes targeted to larger families needing 3 bedrooms. Thirty-three percent or a little over 300 HCV units house families needing 3 or more bedrooms, shown in Figure 143. About 28% of PHA's HCV units serve families needing 2 bedrooms. Regionally, 142,804 families with 5 or more people reported housing problems. The supply of publicly supported housing falls far below the needs of families with housing problems.

Disproportionate Housing Needs	(Plano, TX CDBG, HOME) Jurisdiction			(Dallas-Fort Worth-Arlington, TX) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	17,845	64,780	27.55%	360,875	1,348,425	26.76%
Black, Non-Hispanic	2,785	7,170	38.84%	165,008	362,115	45.57%
Hispanic	4,940	10,460	47.23%	230,317	466,931	49.33%
Asian or Pacific Islander, Non-Hispanic	3,555	15,620	22.76%	37,039	114,143	32.45%
Native American, Non-Hispanic	113	408	27.70%	2,352	7,647	30.76%
Other, Non-Hispanic	465	1,700	27.35%	12,863	34,357	37.44%
Total	29,700	100,135	29.66%	808,445	2,333,530	34.64%
Household Type and Size						
Family households, <5 people	15,050	62,430	24.11%	375,730	1,337,021	28.10%
Family households, 5+ people	3,485	9,160	38.05%	142,804	283,318	50.40%
Non-family households	11,175	28,550	39.14%	289,900	713,190	40.65%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	7,940	64,780	12.26%	166,886	1,348,425	12.38%
Black, Non-Hispanic	1,195	7,170	16.67%	88,173	362,115	24.35%
Hispanic	2,825	10,460	27.01%	138,278	466,931	29.61%
Asian or Pacific Islander, Non-Hispanic	1,925	15,620	12.32%	21,545	114,143	18.88%
Native American, Non-Hispanic	54	408	13.24%	1,307	7,647	17.09%
Other, Non-Hispanic	254	1,700	14.94%	6,805	34,357	19.81%
Total	14,200	100,135	14.18%	422,970	2,333,530	18.13%

Figure 142: Demographics of Households with Disproportionate Housing Needs of Plano and the Region (HUD Table 9, CHAS 2012)



Housing Types and Race/Ethnicity

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

Figure 143: Publicly supported housing programs by race and ethnicity, HUD 2013, NTRHA 2017

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

Plano has a rate (64%) of home ownership slightly greater than the regional rate of 61%. Over half of Plano census tracts have 60%-100% home ownership. The white home ownership rate of almost 70% in Plano significantly exceeds their representation in the general population of about 58%. This trend becomes even stronger at the regional level as white households account for about two-thirds of home owners, but they only represent about half the population. Asian/PI households in Plano rent (15%) and own (16%) homes at rates near their population distribution of 16.5%; this remains true at the regional level. In Plano and the region, black home ownership rates (4% and 10% respectively) remain below their population proportions of 7% and 15%. Black households also represent a greater share of renting households than their population distribution in Plano and the region. In Plano, the Hispanic population achieves home ownership rates of 8% while representing almost 15% of total Plano residents. Regionally, this significant difference continues where Hispanic households account for almost 17% of home ownership and over 27% of the total population. While Hispanic home ownership rates remain lower than expected, the percentage of Hispanic rental households reflects their population distribution, which likely indicates different household density patterns between Hispanic households and other races.

	(Plano, TX CDBG, HOME) Jurisdiction				(Dallas-Fort Worth-Arlington, TX) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	44,780	69.83%	19,990	55.51%	954,125	66.63%	394,290	43.73%
Black, Non-Hispanic	2,515	3.92%	4,655	12.93%	147,490	10.30%	214,595	23.80%
Hispanic	5,285	8.24%	5,180	14.38%	240,575	16.80%	226,355	25.11%
Asian or Pacific Islander, Non-Hispanic	10,330	16.11%	5,290	14.69%	68,504	4.78%	45,634	5.06%
Native American, Non-Hispanic	205	0.32%	215	0.60%	4,810	0.34%	2,805	0.31%
Other, Non-Hispanic	1,010	1.58%	690	1.92%	16,430	1.15%	17,915	1.99%
Total Household Units	64,125	-	36,010	-	1,431,930	-	901,600	-

Figure 144: Homeowners and Renters by Race, Plano and DFW (HUD Table 16, CHAS 2012)

	(Plano, TX CDBG, HOME) Jurisdiction		(Dallas-Fort Worth-Arlington, TX) Region	
Race/Ethnicity	#	%	#	%
White, Non-Hispanic	153,037	58.12%	3,248,508	50.55%
Black, Non-Hispanic	19,639	7.46%	941,599	14.65%
Hispanic	38,466	14.61%	1,758,738	27.37%
Asian or Pacific Islander, Non-Hispanic	44,991	17.09%	343,585	5.35%
Native American, Non-Hispanic	841	0.32%	25,032	0.39%
Two or More Races, Non-Hispanic	5,866	2.23%	99,655	1.55%
Other, Non-Hispanic	450	0.17%	9,096	0.14%

Figure 145: Plano and DFW regional population by race and ethnicity, (HUD Table 1, ACS 2013)

2. Additional Information

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

According to public participation comments, residents with disproportionate housing needs in Plano include:

- Families with four or more children
- Senior citizens and others living on fixed incomes
- People who are homeless
- Middle- and low-income residents
- Young families just starting out to form their own household
- Victims of domestic violence

Fixed incomes

Figure 146 displays 2016 census data for households in Plano living on fixed incomes (United States Census Bureau, 2016; United States Census Bureau, 2016). In 2016, 40,964 persons (estimated) had reached early retirement age for Social Security (SS) or 14.7% of Plano's population. Nineteen percent of Plano's households had Social Security income. Households with retirement income averaged \$28,103 from retirement income. Average incomes from SS were \$21,000 per year. Households receiving Supplemental Security Income (for persons with disabilities) received an average of \$9,789 in 2016, and households receiving cash public assistance (TANF) received an average of \$3,690. The average third-quarter 2017 rent for an efficiency apartment in Plano was \$976, far above 30% of income for many households on fixed incomes (MPF Research, 2017). Affordable rents for households on fixed incomes in Plano would range from \$92 to \$703 per month at 30% of income if living on one of these sources of income. Many public participants stated that property taxes are a significant problem for homeowners on fixed incomes. The average market value of homes in Plano in 2017, for the purposes of property taxation, was \$352,496 (Collin Central Appraisal District, 2017). The annual tax liability for a person with the average home value, claiming only a homestead exemption, would be \$6,677.89 or \$556 per month, representing 32% of annual income for the average household receiving SS only in 2016 (Collin County Texas, 2018).

2016 Plano residents with fixed incomes	% of 2016 Population/Households	Number	Average Income by Source	Affordable Monthly Housing Cost @ 30% of Income
Total population		279,088		
62 years and over	14.68%	40,964		
Total Households		105,189		
Households on fixed income:				
With Supplemental Security Income (SSI)	2%	2,140	\$9,789	\$245
With Cash Public Assistance income	0.80%	843	\$3,690	\$92
With Social Security (SS) income	19.06%	20,047	\$21,000	\$525
With Retirement income	12.16%	12,792	\$28,103	\$703
If SS and Retirement income			\$49,103	\$1,228

Figure 146: Plano Population and households with fixed incomes, ACS 2016

Larger families

Figure 147 displays information on the presence in families in Plano that are larger or live in crowded conditions (United States Census Bureau, 2016). In the third quarter of 2017, the average market rent for a three-bedroom apartment in west Plano was \$1,857 and apartments were 95.7% occupied (MPF Research, 2017). Monthly rent for a three-bedroom apartment in central/east Plano was \$1,582 and occupancy was 94%. An income of at least \$56,952, three times rent, would typically be required to afford the average three-bedroom apartment in central/east Plano, according to reports from renters participating in focus groups.

Large families 2016 ACS	% of total housing units	# of housing units
Households with four or more persons	25%	26,718
More than one occupant per room	2%	2,314

Figure 147: Families in Plano in 2016 with four or more persons or living in housing units with more than one occupant per room

Young households

Figure 148 describes the number of households of various compositions with a primary householder age 15 to 34 (United States Census Bureau, 2016). A significant number of young householders live alone (5,575), putting pressure on the availability of efficiency and one-bedroom apartments. In central/east Plano, the occupancy rate for efficiencies was 95.2% and 94.4% for one-bedroom apartments (MPF Research, 2017). Rents in the third quarter of 2017 averaged \$908 and \$1,033, respectively, requiring at least an income of \$32,688 for efficiency units that averaged 568 square feet in size.

Young families	% of total housing units	# of housing units
Married-couple family Householder 15 to 34 years	7.8%	8,205
Male-householder, no wife present 15 to 34 years	1.3%	1,367
Female-householder, no husband present 15 to 34 years	2.2%	2,314
Householder living alone, 15 to 34 years	5.3%	5,575
Householder not living alone, 15 to 34 years	2.2%	2,314
Family with own children under 6 years only	7.1%	7,468

Figure 148: Composition and prevalence of households with householder age 15 to 34, Plano 2016

Low-income households

Figure 149 displays annual household income for 2016 and the number of households at low and moderate income levels (United States Census Bureau, 2016). Many households (3,880) in Plano in 2016 would only be able to afford a maximum of \$250 per month for rent at the 30% of income level, leaving too little residual income to afford transportation, healthcare, child care and meet other basic needs; an estimated 18,213 households (17% of households) with incomes less than \$34,999 per year would not be able to afford the average efficiency apartment (\$976, west Plano or \$908, east/central Plano) (MPF Research, 2017).

Annual household income	% of total households	# of households	Max affordable rent/month at 30% of income
Less than \$10,000	4%	3,880	\$250
\$10,000 to \$14,999	2%	2,393	\$375
\$15,000 to \$24,999	5%	5,215	\$625
\$25,000 to \$34,999	6%	6,725	\$875
\$35,000 to \$49,999	10%	10,652	\$1,250
\$50,000 to \$74,999	17%	17,871	\$1,875
\$75,000 to \$99,999	13%	13,548	\$2,500
Median Income	\$85,085		\$2,127

Figure 149: 2016 annual household income (ACS 2012-2016 estimates, margin of error 6-14%)

Families with children

Children in Collin County are more likely to live in high-income families and less likely to live in poverty than in the surrounding region (Children's health, 2017). The proportion living in poverty is much higher for black (14.5%) and Hispanic children (23.1%) than for white children (9%). Children are also more likely to live in poverty if they live in single-father (20%) or single-mother (30.9%) households. Family median income falls by 63% for children with single mothers compared with two parent households. Figure 150 displays the number of homeless children by county as identified by school districts (Children's health, 2017). The number of homeless children grew by 57% in Collin County from 2011 to 2015 while the child population grew by only 6%.

	2011	2012	2013	2014	2015
Dallas	5,325	6,555	6,821	8,646	8,959
Collin	1,971	2,193	2,566	2,933	2,913
Cooke	19	22	69	92	123
Denton	1,190	1,615	1,079	1,702	2,096
Fannin	49	65	112	92	103
Grayson	848	883	1,125	1,175	859

Data Source: Texas Homeless Education Office: Texas Local Education Agency Homeless Count Totals.

Figure 150: Number of homeless children by county

Worst case housing needs and housing cost burdens

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

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

Forty-nine percent (48.5%) of households in the Dallas-Fort Worth-Arlington metropolitan statistical area with incomes at or below 50% of area median income met the criteria for worst case housing needs in 2015. The number of households with worst case housing needs grew nationally by 39% from 2005 to 2015. Most worst case housing needs were a result of severe rental cost burdens rather than inadequate conditions. The national increase in worst case housing needs was accompanied by a significant shift from home ownership to rental housing. New renters absorbed much of the increase in rental housing, continuing competitive upward pressure on rents (Watson, Steffen, Martin, & Vandenbroucke, 2017).

Gross rent equaled 35% or more of income for 13,055 households in Plano in 2016 or 34% of all renter households (United States Census Bureau, 2016). HUD defines housing cost burden as paying more than 30% of income for rent and utilities and severe housing cost burden as paying more than 50% of income for rent and utilities. Figure 151 shows the number of households at various income levels and the percent of total households at each income level with different rates of severe housing cost burden for the city of Plano in 2014 (U.S. Department of Housing and Urban Development: Office of Policy Development and Research, 2014). Seventy-three percent of total households with incomes below 30% of HAMFI spend more than 50% of their income on housing and utilities with both extremely low-income renters (75%) and owners (68%) experiencing severe housing cost burden.

Income by Cost Burden (Total Households)	# of Households Cost Burden > 50%	% Cost Burden > 50%	# of Households Cost burden > 30% to 50%	% Cost Burden >30% to 50%	# of Households Not Cost Burdened	% Households Not Cost Burdened	Total Households
Household Income <= 30% HAMFI	5145	73%	600	8%	1345	19%	7090
Household Income >30% to <=50% HAMFI	3410	49%	2250	32%	1360	19%	7020
Household Income >50% to <=80% HAMFI	2140	16%	6175	46%	5185	38%	13500
Household Income >80% to <=100% HAMFI	435	6%	2190	28%	5280	67%	7905
Household Income >100% HAMFI	745	1%	4825	7%	61100	92%	66670
Total Households	11875	12%	16040	16%	74270	73%	102185
Income by Cost Burden (Renters only)							Total Renters
Household Income <= 30% HAMFI	3785	75%	355	7%	940	19%	5080
Household Income >30% to <=50% HAMFI	2015	48%	1635	39%	530	13%	4180
Household Income >50% to <=80% HAMFI	1005	13%	4180	54%	2585	33%	7770
Household Income >80% to <=100% HAMFI	50	1%	790	20%	3055	78%	3895
Household Income >100% HAMFI	165	1%	615	4%	16050	95%	16830
Total Renter Households	7020	19%	7575	20%	23160	61%	37755
Income by Cost Burden (Owners only)							Total Owners
Household Income <= 30% HAMFI	1365	68%	240	12%	405	20%	2010
Household Income >30% to <=50% HAMFI	1390	49%	615	22%	835	29%	2840
Household Income >50% to <=80% HAMFI	1135	20%	1995	35%	2600	45%	5730
Household Income >80% to <=100% HAMFI	385	10%	1400	35%	2220	55%	4005
Household Income >100% HAMFI	580	1%	4215	8%	45045	90%	49840
Total Owner Households	4855	8%	8465	13%	51105	79%	64425

Figure 151: Plano severe housing cost burden by income level, 2014 CHAS

Figure 152 displays the 2014 HUD area median family income ranges at each level of income under 100% HAMFI along with the income that would be left for all living expenses, savings and emergencies after spending 30% of annual income on housing and utilities (U.S. Department of Housing and Urban Development: Office of Policy Development and Research, 2014). Households below 50% area median income have very little residual income to cover other living expenses (food, clothing, transportation, healthcare, etc.) after paying 30% of their income for affordable housing. Spending more than 30% on housing makes their situation even worse.

HUD Area Median Family Income	Annual Income ranges (2014)	Maximum residual Income if 30% Spent on Housing
Household Income <= 30% HAMFI	0 to \$20,370	\$14,259
Household Income >30% to <=50% HAMFI	\$20,371 to \$33,950	\$23,765
Household Income >50% to <=80% HAMFI	\$33,951 to \$54,320	\$38,024
Household Income >80% to <=100% HAMFI	\$54,321 to \$67,899	\$47,529

Figure 152: Collin County 2014 HAMFI ranges with residual income if 30% spent on housing and utilities

Figure 153 displays the information in Figure 151 in graphic form. Households that are not cost burdened (spend 30% or less of their income on housing and utilities) are shown in green with households spending more than 30% and up to 50% in yellow and those spending over 50% of their income in red. More renters with incomes at 50% or below median income spend more than 50% of their incomes on housing and utilities as indicated by the red and yellow bars in Figure 153 than any other group. The rate of households who are housing cost burdened decreases as income increases with households with incomes less than 50% HAMFI experiencing the greatest rates of housing cost burden.

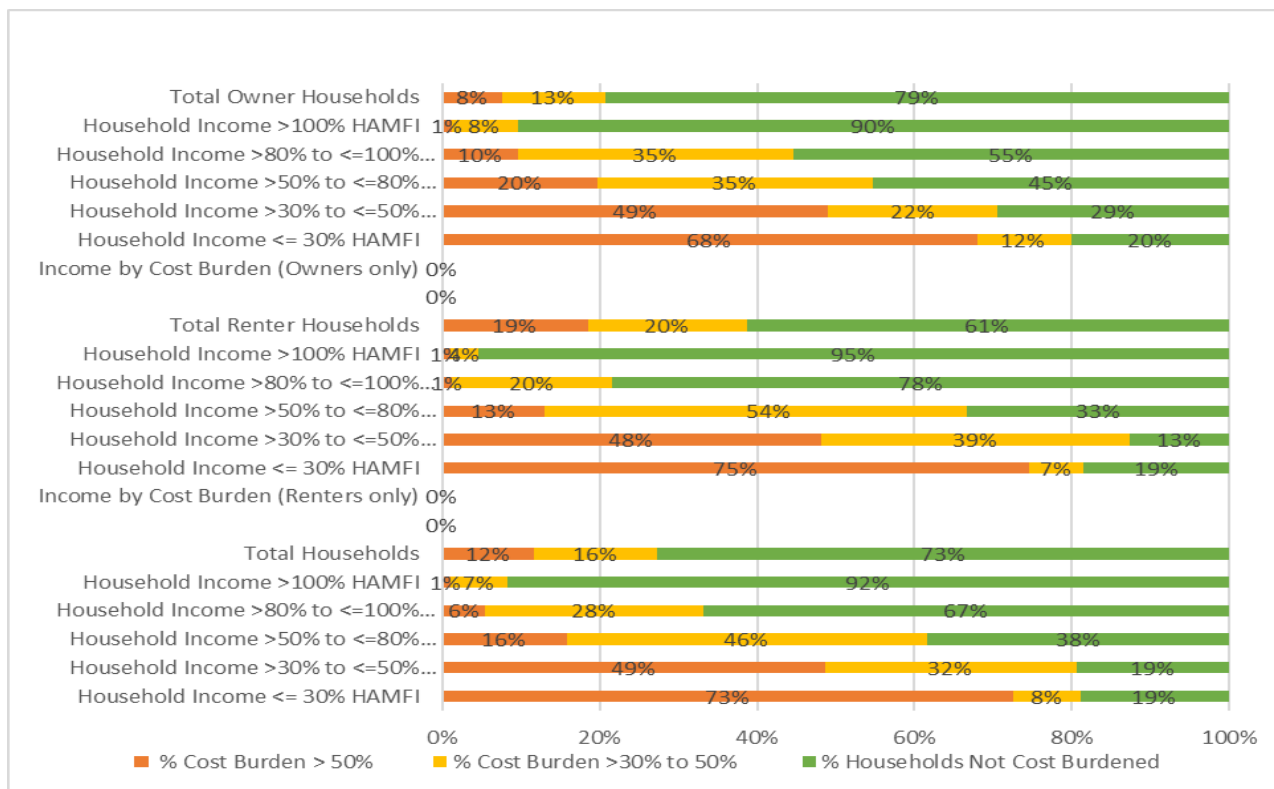


Figure 153: Severe housing cost burdened households by housing tenure, CHAS 2014

b.

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

PHA Statement of Needs/Waiting Lists

The PHA bases its statement of housing needs in its Annual Plan on information from its waiting lists (Plano Housing Authority, 2017). Figure 154 displays housing needs by family type and type of need. Greatest housing needs are among families with income at or below 30% of area median income, families with children and black families. The HCV waiting list has been closed for 41 months and PHA has no expectation of being able to open the list in the 2017-2018 plan year.

Family/Need Type	Housing Needs Statement	Wait List Public Housing	Wait List HCV
Income <=30% AMI	1540	329	1211
Income 31-50% AMI	498	35	463
Income 51-80% AMI	229	22	223
Families w/children		386	1613
Elderly	64	3	61
Disabilities	274	28	246
White	177	55	122
Black	2020	329	1690
Hispanic	82		
Asian/PI	14	2	12
Native American	3		3
Other race/ethnicity			70
3 Bedrooms		318	
4 Bedrooms		68	
Total		386	1897

Figure 154: PHA Statement of Housing Needs and waiting list demographics (PHA 2017)

Homelessness

Participants in public meetings, interviews and focus groups stated that homelessness is a significant and growing problem in the City of Plano that the general population is not aware of. Service providers say that they do not have the resources required to meet the growing need. The City of Plano supports the annual HUD point-in-time count of homeless persons in January each year. Figure 155 includes data collected in January 2017 when 218 persons, 90 unsheltered and 128 sheltered, were counted in Plano (City of Plano, 2017). In 2016, 533 students were identified as homeless in the Plano Independent School District (Cronin, 2017). Most homeless persons in Collin County are employed. Most are homeless due to the unaffordable cost of housing coupled with adverse life events such as the failure of a business, a child with major health expenses or loss of or escape from a domestic partner. Homeless persons find shelter by sleeping in their cars, using extended stay motels, seeking assistance from nonprofits or camping. Collin County has an inventory of 300 beds for homeless persons. No emergency shelter is located in Collin County. The only general shelter in Collin County, Samaritan Inn, is located in McKinney. City House, located in Plano, serves children and youth to age 22 with emergency shelter, transitional housing, rapid re-housing and other services (City House, 2018). City House operates at full capacity and maintains a waiting list for teenage boys. Unsheltered teen homelessness increased by 55% in Collin County from 2016 to 2017 (Gilmore, 2017).

2017 Homeless Census

City of Plano

218 persons were identified as homeless in the City of Plano on January 27, 2017

60% are employed

Veterans: Eight individuals are U.S. military veterans (1 is sheltered and 7 are unsheltered)

Top 5 Reasons for Homelessness: Domestic violence, Unable to pay rent/mortgage, Kicked out of house, Lack of affordable housing, Physical/mental disabilities

Sleeping locations: 41% shelter, 20% street/sidewalk, 7% vehicle, 6% DART station, 26% other

Top 5 Reported Needs: Emergency shelter, Dental care, Bus pass/transportation, Clothing/laundry facility, Place to store belongings

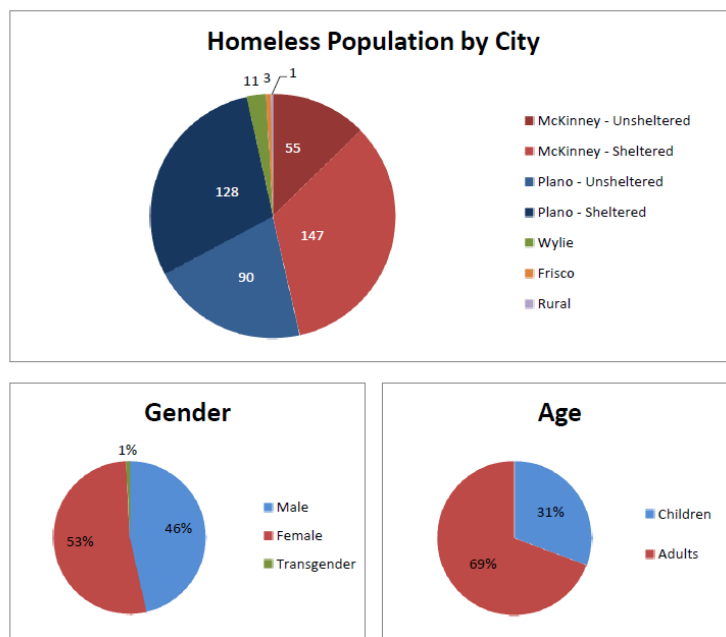


Figure 155: 2017 Plano point-in-time count of homelessness

The City of Plano has been an active participant in the Collin County Homeless Coalition with its staff serving in an advisory position on the leadership team (Cronin, 2017). The City of Plano is a member of the Dallas County Continuum of Care, partnering with other nonprofits and municipalities to develop policies and programs to address homelessness (Metro Dallas Homeless Alliance, 2018). The City's Housing and Community Services Manager currently serves on the Board of Directors for Metro Dallas Homeless Alliance (Eaden, 2018).

Domestic Violence

Plano has three domestic violence programs, two of which offer emergency shelters (Theresa's Fund, Inc., 2018). All three organizations, Hope's Door New Beginning Center, Emily's Place and the Texas Muslim Women's Foundation, provide housing services. While 63% of homeless women report experiencing intimate partner violence as adults, 33% report severe assault by their current or most recent partner (Browne, 1998). In 2015, Hope's Door provided emergency shelter to 375 women and children (Hope's Door, Inc., 2015). In 2016, Texas Muslim Women's Foundation provided shelter for 73 persons but served 361 victims of family violence (Texas Muslim Women's Foundation, 2016). Service providers in focus groups report that they regularly turn away families and women in need of housing who are fleeing domestic violence.

Place-based revitalization and housing rehabilitation assistance

In response to problems with aging housing stock and aging communities, the City of Plano offers a menu of programs to assist with home rehabilitation and neighborhood improvements.

- The City of Plano provides **Limited Repairs Assistance** of up to \$45,000 per home through partially forgivable loans to stop deterioration and improve energy efficiency (City of Plano, 2018). One participant in a focus group was a recipient of the loan and complimented the City on the thoroughness of the assistance provided to address safety and health issues beyond the immediate reason for the request for assistance (City of Plano, 2018).
- The City also provides **Emergency Assistance** through grants to address serious and immediate threats to the health or welfare of the household, including mechanical and plumbing repairs. Another focus group attendee explained that she was able to use the program to repair or replace a broken air conditioning system, critical during the Texas summer.
- The City also offers **Limited Repair Assistance for Investor-Owned Properties** to maintain the quality of aging multifamily housing stock specifically targeted at one- to four-unit properties. This is a particularly significant strategy to combat increasing poverty concentration. Researchers found that poverty grew the fastest in communities with high concentrations of one- to four-unit apartment properties. These properties are owned and managed by non-professionals, operate with small profit margins and are particularly prone to deferred maintenance (Pendall, Theodos, & Hildner, 2016).
- The **Multifamily Rehabilitation Rebate** pilot program targets multifamily properties 15 years of age or older and located within half a mile of the City's "transform centers" as designated by the City comprehensive Plan. These properties receive a \$20,000 rebate and a rebate of all building permit fees on exterior improvements made to the property. The Neighborhood Services Department advertises directly to these eligible properties and through its code enforcement's multifamily inspection staff. The program is being assessed for expansion.
- The **Great Update Rebate** program provides up to \$5,000 toward the improvement of owner-occupied, tenant-occupied or vacant property, including single-family houses, duplexes, townhouses and condominiums (City of Plano, 2018).
- The City maintains a **Rental Registration and Inspection** program for multifamily housing that is at least five years old with five or more dwelling units (City of Plano, 2018). Properties are graded A through F based on the number of violations found during inspection. A map is

posted on the City's website with the latest property grades available for view by the public. No properties with a grade of C are found in northwest or north central Plano. C graded properties are primarily located in south central and southeast Plano. Citizens can file complaints about properties that appear to be in violation of building codes.

- **Love Where You Live** is a volunteer-based program targeting specific communities in need of revitalization. Projects include debris removal, landscaping and minor home repair for persons with financial or personal barriers to home maintenance; 6,433 volunteers contributed 30,090 hours removing 150 tons of landscape debris, 82 tons of trash and repairing 357 homes since 2010 (City of Plano, 2018). The current Love Where You Live neighborhood improvement project is in the Village Creek neighborhood in east Plano, near Parker Road and P Avenue. One neighborhood is targeted per year.
- The **Empower** program provides leadership development, mentoring and training to neighborhood associations to foster community engagement and collaborations across the City around community projects (City of Plano, 2018).

The City of Plano distributes 5,000 postcards once or twice a year to all properties at or below 85% of the median price of the Dallas MSA as determined by HUD (10,000 in 2017) to inform potentially eligible households about the City of Plano home repair and housing rehabilitation programs. Approximately 20,000 homes fall in this category. Postcards are sent to different zip codes on a rotating basis (Evans, 2018). Figure 156 and Figure 157 display the locations of the housing rehabilitation projects completed in 2014 and 2015. Most of the projects are located in the lowest income sectors of Plano, particularly east of US 75.

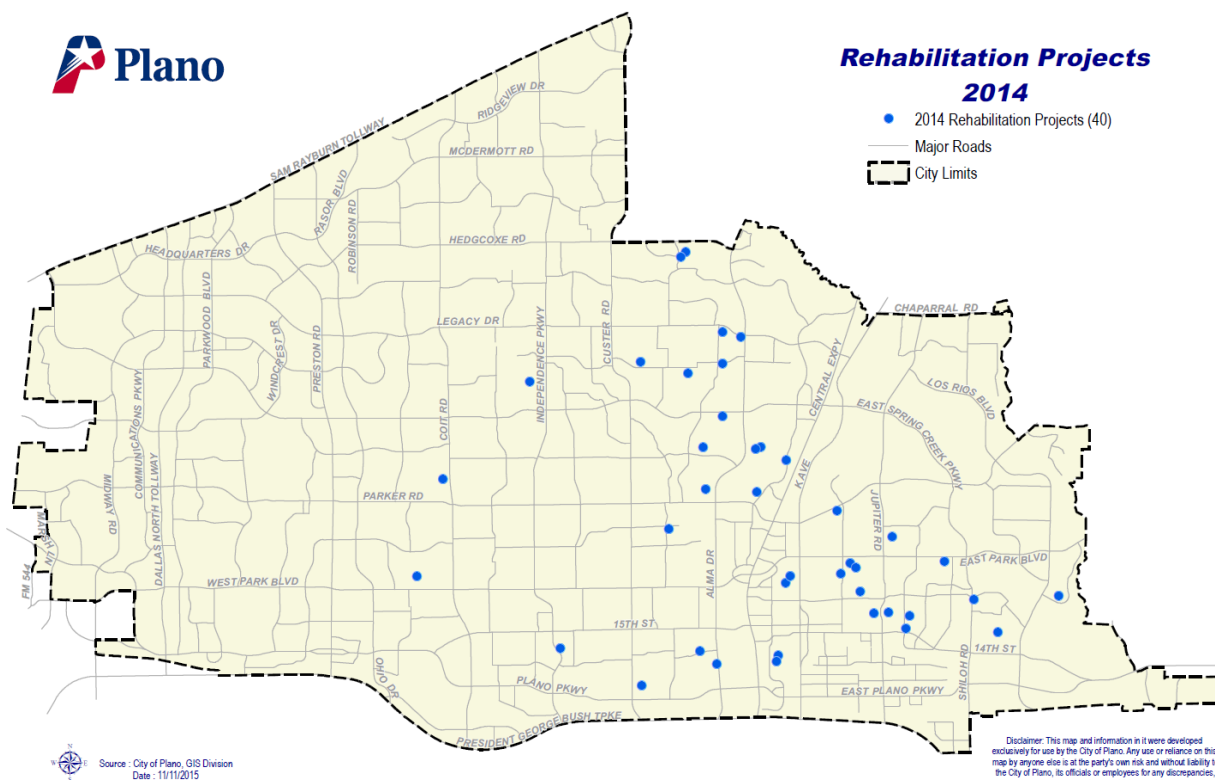


Figure 156: 2014 City of Plano housing rehabilitation projects

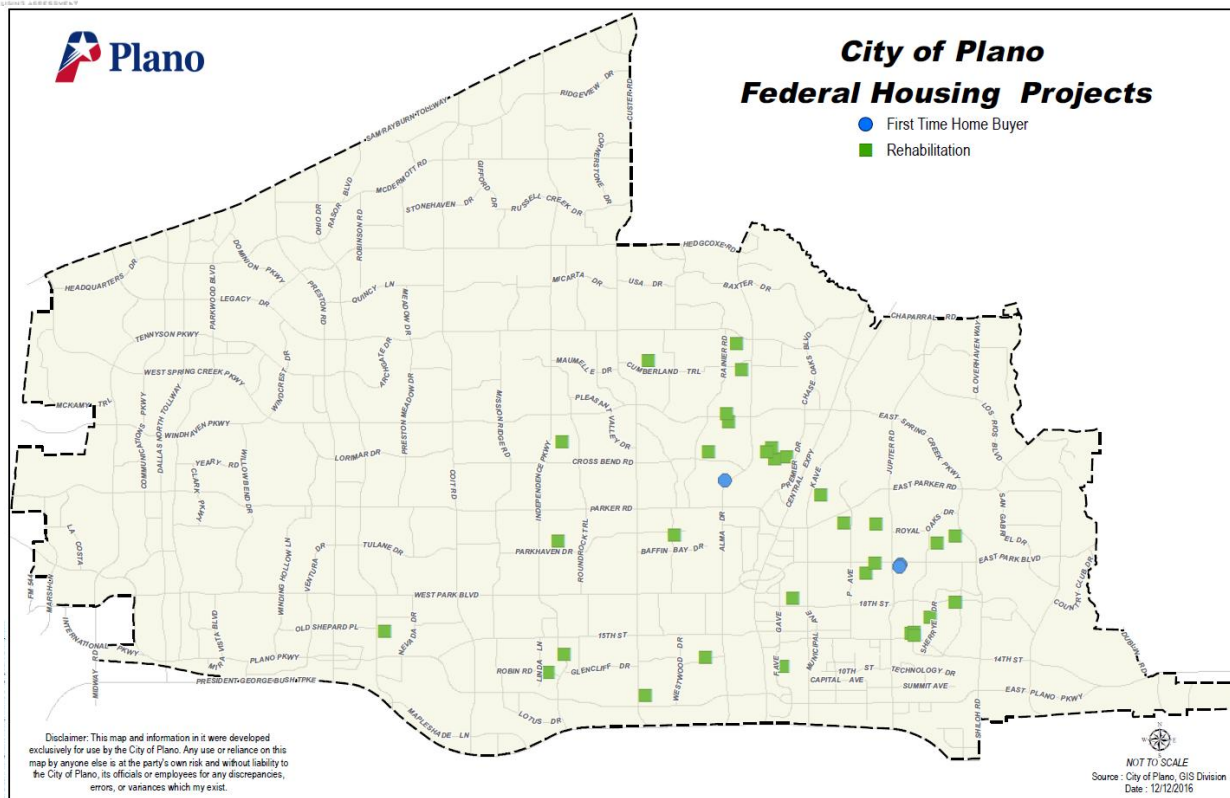


Figure 157: 2015 City of Plano housing rehabilitation projects

3. Contributing Factors of Disproportionate Housing Needs

Contributing factors to barriers to fair housing for persons with disproportionate housing needs include the following issues as identified through community engagement activities.

Economic issues affecting housing affordability: Participants attributed the lack of affordable housing to the community's economic and population growth and an influx of residents from other states putting upward pressure on housing prices with increased demand in relation to supply. From 2006 to 2016, the population in Collin County increased by 3.2% per year (JobsEQ, 2017). The opening of Toyota's corporate campus in 2017 brought 4,000 new residents per year to the area (Hanley Woods Media, Inc., 2017). New arrivals reported spending months seeking housing and paying significantly more than they budgeted for overpriced units. Participants in focus groups stated that homes are selling "as is" with significant needs for rehabilitation. Figure 158 describes annual rent changes and a forecast of annual supply and demand for Plano apartments (MPF Research, 2017). Rents increased 13.1% in west Plano over the three-year period ending in the third quarter of 2017. Rents increased by 11.7% in the three-year period in central/east Plano. Demand is forecast to exceed supply in the 2017-2018 period following a slight decrease in rents in the 2016-2017 year. Upward pressure on rents is expected to continue resulting in decreasing affordability.

Apartment Housing	Average annual rent change			3-year change	Forecast (Units)	
Annual rent change	3rd Qtr. 2015	3rd Qtr. 2016	3rd Qtr 2017		Annual Supply	Annual Demand
West Plano	4.80%	9.10%	-0.80%	13.1%	1,091	1,391
Central/East Plano	7.50%	5.60%	-1.40%	11.7%	175	618

Figure 158: Apartment rent change from third quarter 2014 through third quarter 2017 and forecast of supply and demand

Participants in public engagement identified contributing factors, including lack of access to opportunity due to high housing costs, loss of affordable housing, lack of affordable units in a range of sizes, displacement of residents due to economic pressure, rapidly rising rents and property taxes pricing them out of high-opportunity areas. Increasing costs for property taxes and homeowner insurance resulting from increasing property values were also identified by many as contributing to increasing housing costs.

Special needs housing: Many comments were received related to housing size. Participants stated that they knew of many families that were living in crowded conditions with multiple families living in one housing unit. The need for special housing, emergency shelter and services for persons who are homeless was mentioned repeatedly by advocates. Other comments emphasized the lack of affordable options to choose between single- and multifamily housing types. Participants expressed the need for more single-story homes and homes affordable to persons on a fixed income. Homes affordable to middle-income residents were also seen as needed in addition to low-income housing. Young families and seniors were identified as being disproportionately impacted by the lack of affordable housing options and rising prices.

Lack of public and private investment in specific neighborhoods: Many participants identified physical problems with the older homes that lower income people could afford. Property maintenance was also identified as a problem in rental properties where landlords fail to maintain the property and allow code violations to develop.

Several participants identified problems with lack of housing support for **victims of domestic violence**.

Sample participant comments from the appendix:

- The good economy is driving businesses to move to the area. Businesses bring their employees who are used to paying higher rates for housing (e. g. Toyota moving from California). That, then, increases the prices that landlords are asking. The influx of people also causes a housing shortage that also increases pricing.
- Economic development is a good thing for the economy but a hardship on low-income people.
- Houses were bought by investors "as is" within days. There were no homes available to HUD standards.
- Increased property values put ownership out of reach for workforce wages.
- It's difficult when a landlord increases rent on someone with a fixed income trying to balance part-time employment, education – retirement/disability.

- We have a lot of older couples in our neighborhood; they are having trouble paying taxes on these increasing property values.
- I see too many people living in one house.
- We have a lot of single-family homes with multiple families living in them. Adds to transportation and parking issues in the neighborhood.
- I know a mother with six kids living in a two-bedroom house.
- I bought the only thing I could afford. I have four children, single mom. I don't qualify for housing, but I don't make enough to get a better home. I have five people in our house with just two bedrooms. I live in east Plano. I qualified for the City of Plano Emergency Repair program, which helped me repair my AC.
- We are seeing a lot of college kids moving back in with parents because they cannot afford to get their own place. We have a lot of older couples in our neighborhood, they are having trouble paying taxes on these increasing property values. As part of our home owners association, we are looking to find a way to keep our amenities up but without upping the fees. We need to have a debate between affordable and acceptable. Older laws are having trouble keeping up with today's demands.
- Most of the homes are older and come with a variety of expensive problems. Need financial help to fix the issues.
- When I bought my house, its insulation and electrical was very minimal. I had to go and get a loan to get repairs on my home to try and make my utilities affordable.
- Dealing with emergency home situations (physical structure issues with the home) is a problem. When you live paycheck to paycheck, no funds to repair.
- We have this smell in our house (sewer problem) but the landlord doesn't do anything about it.
- I know someone who was offered a voucher and six months to find a place to live – the only places she could find were awful, roach-infested, so she gave up.
- In the house next to me, there are a lot of 'illegals' living in there. They are violating city codes and bringing down our neighborhood with the littering. I have called the police but there was nothing they could do about it. Code enforcement cannot address the issues. There's a lot of noise problems.
- Our domestic violence shelters are staying full. We are forced to rotate the clients to other places, one month minimum, three max, but we are forced to rotate these clients due to lack of space to meet the demand. No apartments here accept vouchers. We are turning victims away and they are going to have to go stay with their abuser.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

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

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

Figure 159 and Figure 160 provide participation rates for the publicly supported housing programs by race and ethnicity for Plano and the region. Plano has an estimated 1,093 households residing in publicly supported housing units, which represents close to 1% of Plano's total household population (100,139 households). White households are the largest group (428 households) living in publicly supported housing in Plano, followed by black (412), Asian/PI (200) and Hispanic (53) households. Black households represent a majority in both Public Housing and the Housing Choice program while white households represent the majority in Project-Based Section 8 Housing, and Asian/PI the majority in other multifamily housing. The greatest numbers of white, black and Hispanic households participate in the HCV program. Most Asian/PI households participate in other multifamily housing programs.

The region included an estimated 42,522 households residing in publicly supported housing units in 2013, which represents nearly 2% of the region's total households (2,333,530 households). In Plano and the region, black households reside in publicly supported housing units at rates (38% and 58%) significantly greater than their general population distribution (7% and 15%) while the Hispanic population appears particularly underrepresented.

(Plano, TX CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	7	33.33%	14	66.67%	0	0.00%	0	0.00%
Project-Based Section 8	76	59.38%	10	7.81%	15	11.72%	26	20.31%
Other Multifamily	113	38.05	9	3.03%	15	5.05%	157	52.86%
HCV Program	232	35.58%	379	58.13%	23	3.53%	17	2.61%

Figure 159: Publicly supported housing program and Race/ Ethnicity, Plano, 2013 (HUD Table 6, IMS/PIC, TRACS, 2013)

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

Figure 160: Housing type and Race/Ethnicity, the Region (HUD Table 6, IMS/PIC, TRACS, 2013) *HCV race/ethnicity not mutually exclusive

ii

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

The following comparative racial/ethnic demographic portraits of each program at the jurisdictional and regional levels rely primarily on HUD-provided data.

The racial/ethnic groups' shares differ substantially between the City and the region (Figure 161). For the Project-Based Section 8 program, the share of black households is greater for the region (49%) than for the City (8%). The proportion of Hispanic households residing in Project-Based Section 8 units in the City of Plano (12%) is less than the regional share (17%). The share of Asian or Pacific Islander households in Project-Based Section 8 units in the City of Plano (21%) is more than three times larger than the regional share (7%).

As for the Public Housing program, the share of black households is smaller for the City of Plano (69%) compared to the region (77%). Correspondingly, the proportion of white (33%) households is greater in Plano than in the region (10%). The share of Asian or Pacific Islander is 3% in the region and nonexistent in Plano, as is the case with the share of Hispanic residents at 10% in the region and 0% in Plano.

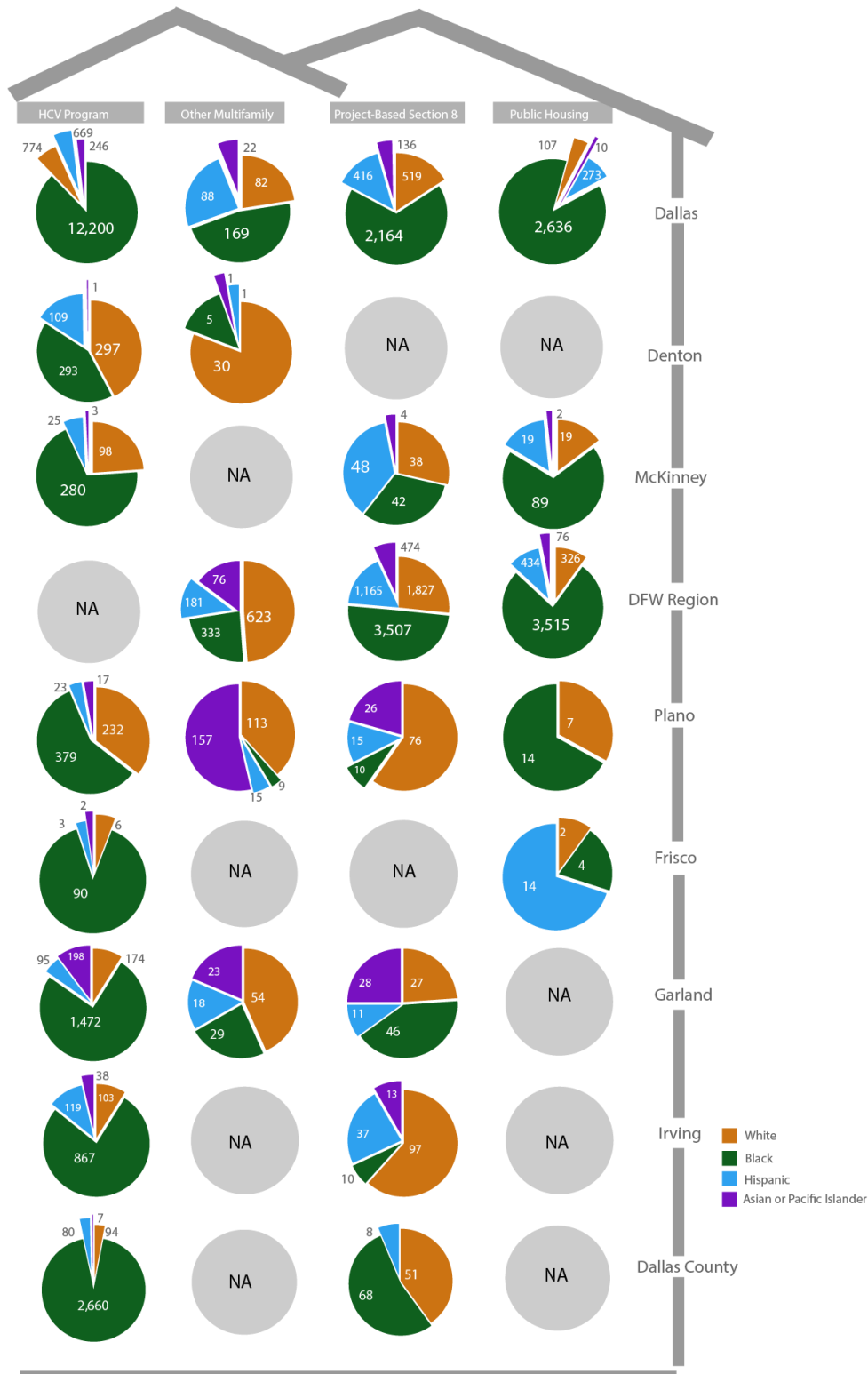


Figure 161: Housing programs by race and ethnicity of participants, Plano and region, (HUD IMS/PIC, TRACS 2013)

iii.

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

Race/Ethnicity and Income Eligibility

The HUD-provided table as shown in Figure 162 includes race/ethnicity data for the total population in the jurisdiction and for persons meeting the income eligibility requirements for publicly supported housing programs. For the purpose of this section, three additional rows are created:

- The aggregate percentage of income-eligible households (0%-80% AMI) for each race/ethnicity group;
- The percentage of participants in publicly supported housing programs based on the total income-eligible population for each racial/ethnic group, to capture program participation rates;
- The total proportion of each racial and ethnic group in all publicly supported housing programs combined.

The table shows that white households make up 65% of the total City population, followed by 16% Asian or Pacific Islander households and 7% black households. The ethnic composition for the City of Plano is 10% Hispanic and 90% not-Hispanic. The racial/ethnic composition of publicly supported housing programs in the City of Plano differs from the one of the region. The share of black households residing in publicly supported housing is greater in the region (71%) than in Plano. Conversely, the proportions of white (39%) and Asian/PI (18%) accessing housing authority programs are greater in the City of Plano than in the region (respectively 18% and 3%).

In Plano, the white population represents a greater than expected proportion of the Project-Based Section 8 program, and the Asian/PI population appears over-represented in other multifamily housing. The black population represents a greater proportion of the Public Housing and HCV programs. These trends appear similar at the regional level, but the white population represents a greater than expected proportion of other multifamily housing.

The table in Figure 162 shows that 49% of Hispanic households are income eligible, followed by 39% of black households, 18% of Asian or Pacific Islander households and 22% of white households. About 15% of income-eligible black households participate in publicly supported housing programs, primarily in the Public Housing and HCV programs. While 49% of Hispanics are income eligible, only 1% are residing in publicly supported housing units, primarily in Project-Based Section 8 housing units. Similarly, while 18% of Asian/Pacific Islanders meet income eligibility requirements, about 7% participate in publicly supported housing programs. Finally, 3% of income-eligible white households live in publicly supported housing.

The proportions of income-eligible households by race and ethnicity participating in publicly supported housing programs in Plano are approximately the same as the region, except for Asian and Pacific Islander (Asian/PI) households. More than seven percent of Plano income eligible Asian/PI households live in publicly supported housing while less than four percent of regional Asian/PI income eligible households use publicly supported housing.

	Race/Ethnicity							
Plano	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	7	33.33%	14	66.67%	0	0.00%	0	0
Project-Based Section 8	76	59.38%	10	7.81%	15	11.72%	26	20.31%
Other Multifamily	113	38.05%	9	3.03%	15	5.05%	157	52.86%
HCV Program	232	35.58%	379	58.13%	23	3.53%	17	2.61%
Total From all Programs		39.16%		37.69%		4.85%		18.30%
Total Households	64,780	64.69%	7,170	7.16%	10,460	10.45%	15,620	15.60%
0-30% of AMI	3,585	53.87%	770	11.57%	1,155	17.36%	925	13.90%
0-50% of AMI	6,365	46.61%	1,565	11.46%	2,855	20.91%	1,375	10.07%
0-80% of AMI	13,970	52.72%	2,810	10.60%	5,160	19.47%	2,780	10.49%
Percentage Income Eligible		21.57%		39.19%		49.33%		17.80%
Participation Rate based on Income Eligible Population		3.06%		14.67%		1.03%		7.19%
Dallas-Fort Worth-Arlington	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	326	7.49%	3,515	80.75%	434	9.97%	76	1.75%
Project-Based Section 8	1,827	26.07%	3,507	50.04%	1,165	16.62%	474	6.76%
Other Multifamily	623	45.98%	333	24.58%	181	13.36%	209	15.42%
HCV Program (Local Data)	4,679	16.60%	22,827	80.96%	1,738	6.16%	608	2.16%
Total From all Programs	7,455	18.24%	30,182	73.86%	3,518	8.61%	1,367	3.35%
Total Households	1,348,425	57.78%	362,115	15.52%	466,931	20.01%	114,143	4.89%
0-30% of AMI	104,295	37.22%	77,243	27.57%	79,215	28.27%	13,070	4.66%
0-50% of AMI	179,100	32.49%	129,423	23.47%	173,909	31.54%	23,463	4.26%
0-80% of AMI	363,800	38.65%	199,927	21.24%	286,859	30.48%	38,118	4.05%
Percentage Income Eligible		26.98%		55.21%		61.43%		33.39%
Participation Rate based on Income Eligible Population		2.05%		15.10%		1.23%		3.59%

Figure 162: Race/ethnicity for the total population and for persons meeting the income eligibility requirements for publicly supported housing programs (HUD IMS/PIC, TRACS 2013 with NTRHA HCV 2017)

b. Publicly Supported Housing Location and Occupancy

i.

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

The following maps respectively show segregation patterns (white/non-white) in the City of Plano for the year 2015 (Map A, Figure 163), and the location of publicly supporting housing developments in 2013 (Map B of Figure 163). The segregation map shows the extent to which a given neighborhood (census tract) differs from the overall racial/ethnic composition of the City. For further explanation on the methodology of the segregation maps discussed below, refer to the appendix.

Most publicly supported housing programs are in more segregated areas, with a greater share of non-white residents. Project-Based Section 8 units are in areas with a share of non-white residents 30%-40% greater than the City average.

Low Income Housing Tax Credit developments are in areas with greater white population share and in an integrated area, except for two developments. Not shown in the HUD map are the Villas at Mission Bend, located in the census tract in south central Plano with the highest concentration of HCVs, and Savannah at Gateway in far southeast Plano, in the most highly segregated census tract in Plano.

Public Housing units are in areas in which census tract share matched jurisdiction share.

The highest concentrations of HCVs are along US 75, south central and northeast Plano, which also corresponds to an area with a 20%-30% greater share of non-white residents.

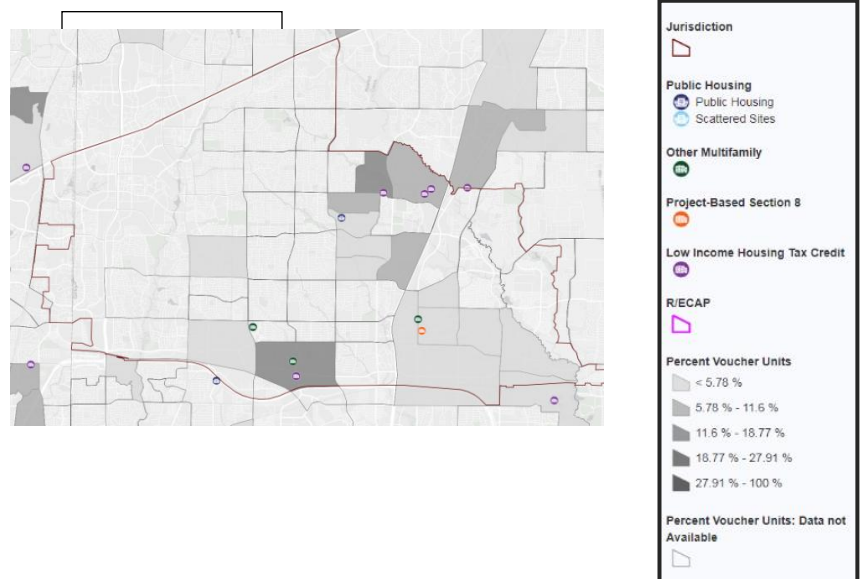
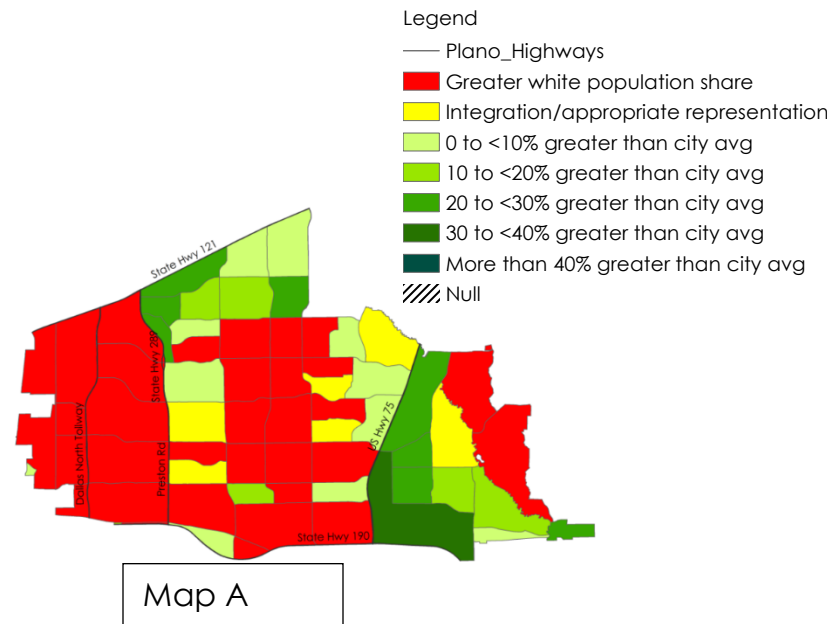


Figure 163: Segregation patterns (white/non-white) and location of publicly supported housing developments (HUD, 2013)

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

Publicly supported housing developments are distributed throughout the community with the exception of far west and central Plano. Developments serving families, pictured in red, in Figure 164, including Garden Gate apartments and Veranda Townhomes (under construction in 2018), are located primarily in higher income west Plano. Developments for seniors and persons with disabilities, (pictured in purple) are located along US 75 and the southern border of Plano. Project-Based and Section 202/811 developments are primarily located in lower income east Plano (U.S. Department of Housing and Urban Development, 2018). Properties located below are further categorized below in Figure 168.

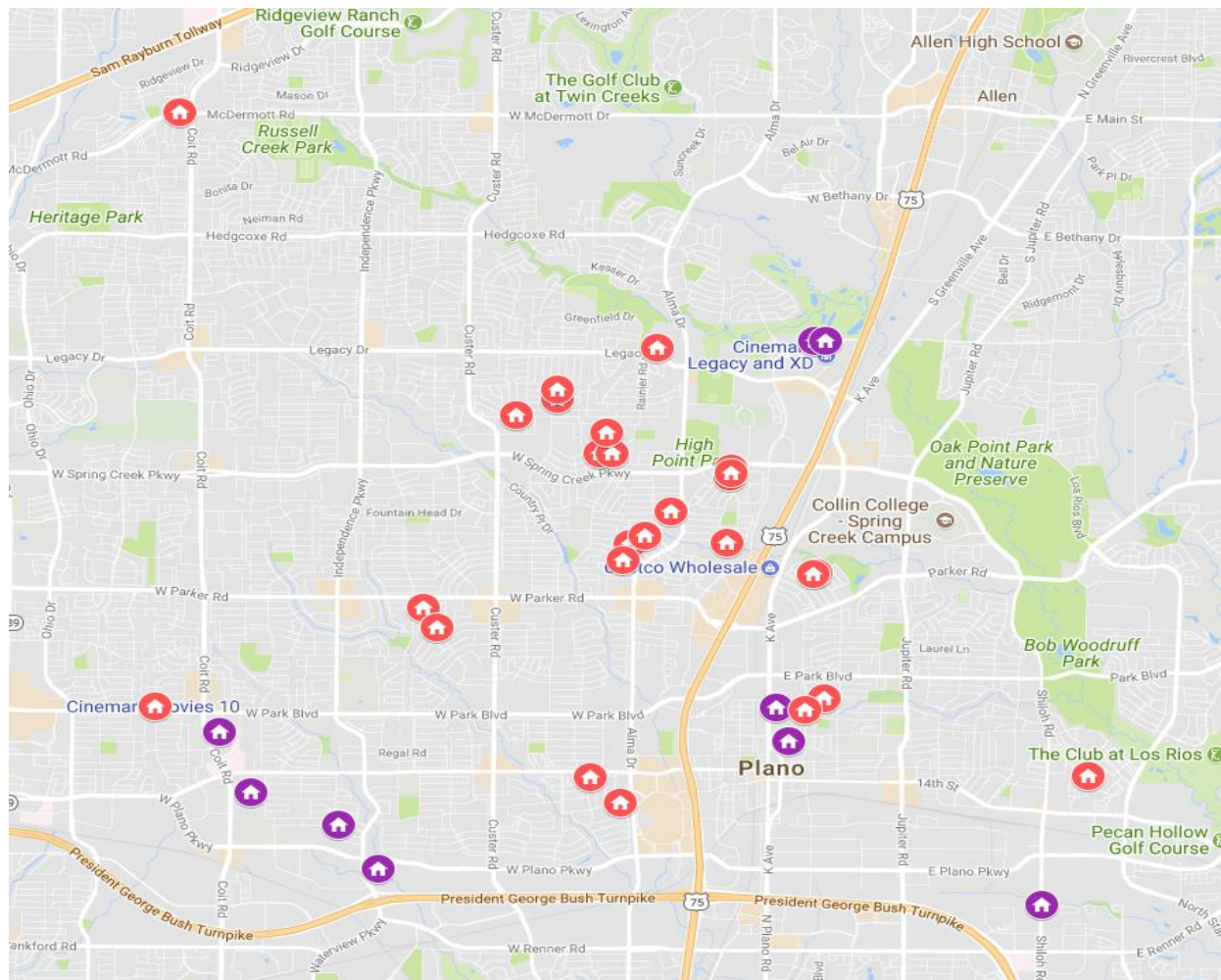


Figure 164: Locations of publicly supported housing in Plano

Plano has no R/ECAPs but includes several census tracts with poverty levels above 20% and concentrations of Hispanic and black residents over 50% (2015 ACS). Two of these census tracts include Plano Community Homes East Campus, Pioneer Place and the Villas at Plano Gateway. All of these communities are senior housing, including Project-Based Housing assistance, Section 202 and LIHTC properties. Only two of PHA's 24 single-family homes (PHA scatter sites) are located in these higher poverty, higher non-white census tracts.

iii

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

The City of Plano has no census tracts that meet the qualifications of R/ECAPS but includes several census tracts with poverty levels above 20% and concentrations of Hispanic and black residents over 50% (2015 ACS). Two of these census tracts include Plano Community Homes East Campus, Pioneer Place and the Villas at Plano Gateway. Demographic information for some of these properties is displayed in Figure 168 in the following section. These properties have approximately the same average rates of non-white residents as properties located in higher income census tracts with lower rates of non-white residents. Plano Community Homes in east Plano has the lowest percentage of non-white residents (41%). Overall demographics for persons living in Plano publicly supported housing are shown in Figure 165.

Plano	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	22	33.33%	66.67%	0.00%	0.00%	72.73%	4.55%	0.00%
Project-based Section 8								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	127	59.38%	7.81%	11.72%	20.31%	0.00%	92.31%	7.69%
Other HUD Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	299	38.05%	3.03%	5.05%	52.86%	0.00%	97.73%	1.94%
HCV Program								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	614	35.58%	58.13%	3.53%	2.61%	44.17%	32.65%	30.47%

Figure 165: Demographics for protected classes of persons living in Plano publicly supported housing (HUD Table 7, IMS/PIC, TRACS, 2013)

While the City does not have any R/ECAPs, the region does. As presented in the preceding sections and delineated in red in the map below, four areas in the region contain R/ECAPs. For the purpose of examining the location of publicly supported housing with respect to R/ECAPs, the HUD-provided tables for demographics of residents of publicly supported housing for Dallas and Fort Worth are shown and discussed below (Figure 166).

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

Figure 166: Demographics for protected classes of persons living in Dallas and Fort Worth publicly supported housing (HUD Table 7, IMS/PIC, TRACS, 2016, LIHTC 2014))

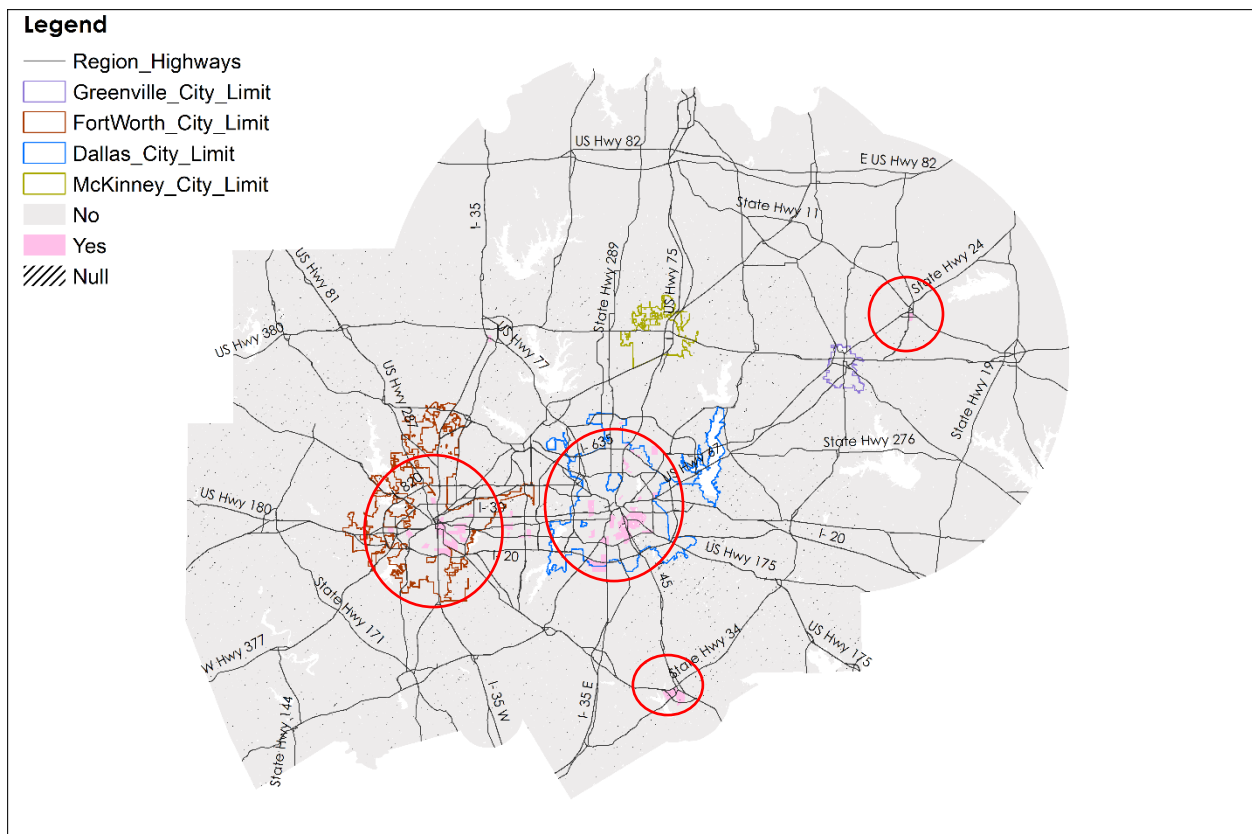


Figure 167: R/ECAPs in NTRHA region, ACS 2013

Area 1: City of Dallas

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

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

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

Figure 166 above shows that a higher proportion (68%) of **HCV** families reside in non-R/ECAP areas. The table further shows that the race/ethnic composition of R/ECAP tracts is comparable to non-R/ECAP tracts. Similar to the Public Housing program, a higher proportion of families with children and persons with disabilities live in non-R/ECAP tracts.

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

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

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

Area 2: City of Fort Worth

A substantially higher proportion of **Public Housing** units in Fort Worth are located in R/ECAP tracts (73%) as opposed to non-R/ECAP tracts (27%). The concentration of black households and families with children is also higher in R/ECAP tracts. Conversely, the concentration of white and Asian or Pacific Islander households is higher in non-R/ECAP tracts. In addition, the proportion of elderly individuals and persons with disabilities is also higher in non-R/ECAP than R/ECAP tracts.

Figure 166 above shows that more **Project-Based Section 8** units are located in non-R/ECAP tracts (55%) than in R/ECAP tracts (45%). Similarly, more **HCV** families reside in non-R/ECAP tracts (85%). For both housing programs, the proportion of black households is higher in R/ECAP tracts; correspondingly, the proportions of white and Hispanic households are higher in non-R/ECAP

tracts. The proportion of families with children is higher in R/ECAP tracts for the Project-based Section 8 program, while it is higher in non-R/ECAP tract for the HCV program.

The concentration of **elderly program participants** is lower in R/ECAP tracts for the Project-Based Section 8 program, while higher in R/ECAP tracts for the HCV programs. As for the concentration of **persons with disabilities**, the numbers are comparable across R/ECAP and non-R/ECAP tracts for both the HCV and Project-Based Section 8 programs.

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

Areas 3 and 4: Greenville and Ennis

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

iv. A

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

HUD has provided demographic data for public housing, Project-Based Housing and other multifamily assisted housing developments located in Plano, displayed in Figure 168. The PHA owns a group of single-family homes designated primarily for families. The residents of these units are disproportionately black. Project-based and other multifamily assisted housing are primarily designated for elderly residents. Demographic information is not available for Low Income Housing Tax Credit projects (U.S. Department of Housing and Urban Development, 2018). Five of the seven LIHTC developments in Plano are designated for elderly residents. Plano Community Homes East and Collin County Community Home also serve persons with disabilities.

Development Name	# Low-income Units	White	Black	Hispanic	Asian	Households with Children	Population Served
Public Housing (Plano Housing Authority)							
PHA Scattered Sites (Single-family homes)	24	36%	64%	0%	N/a	77%	Families
Project-Based Section 8							
Plano Community Homes I (East)	129	59%	8%	12%	20%	NA	Elderly/ Mobility Impaired
Other Multifamily Assisted Housing							
Plano Community Home IV Inc. (West) Section 202	60	46%	2%	5%	46%	NA	Elderly
Plano Community Home III Inc. (West) Section 202	60	38%	N/a	5%	56%	NA	Elderly
Plano Community Home V Inc. (West) Section 202	47	42%	N/a	4%	54%	NA	Elderly
Collin County Community Home (Section 811) Project-based rental assistance	8	N/a	N/a	N/a	N/a	NA	Elderly/ Disabled
Pioneer Place Senior Housing I	60	34%	7%	2%	56%	NA	Elderly
Pioneer Place Senior Housing II	72	31%	7%	11%	51%	NA	Elderly
LIHTC							
Garden Gate Apartments	240						General
Villas of Mission Bend	101					NA	Elderly
Evergreen at Plano Parkway	250					NA	Elderly
The Plaza at Chase Oaks	240					NA	Elderly
Tuscany Villas	90					NA	Elderly
Villas at Plano Gateway Senior Living	233					NA	Elderly
The Veranda Townhomes	20						General

Figure 168: Publicly supported housing projects in Plano with demographic information (HUD Table 8, IMS/PID, TRACS, 2016; LIHTC 2014)

Asian residents in Plano senior housing

Plano has a growing population of Asian residents and this is reflected in the residents of publicly supported housing, primarily in Section 202 housing programs for senior citizens. Plano Community Homes and Pioneer Place, independent living communities for senior citizens, and Section 202 have a significant Asian community, many of whom are Chinese immigrants. When asked during focus groups, residents said they found the community by word of mouth through

friends and family. The CEO stated that the property was identified by recent immigrants entering the United States through visa programs, including family unification (Hubanks, 2017). She stated that patterns of resident ethnicity typically followed patterns of immigration. The service coordinator for the property speaks Chinese and programs are available to reflect the preferences of this ethnic group.

iv. B *Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.*

No additional information.

v. *Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

Plano Publicly Supported Housing Demographics by Race and Ethnicity

Looking at 2013 data, a stark contrast between Plano's overall demographics and the population living in publicly supported housing can be seen. Whereas 58% of Plano's population was white in 2013 (Figure 169), white households made up less than 34% of Public Housing residents (Figure 170). Percentages for Project-Based Section 8 and Housing Choice Voucher households were slightly higher, with white households comprising roughly 59% of those in Project-Based Section 8 housing and about 36% of those utilizing Housing Choice Vouchers. These figures align with the disproportionate percentage of low-income households in Plano that are non-white.

Black residents made up roughly 7.5% of the population but nearly 67% of Public Housing and 58% HCV households. Black residents make up a much smaller proportion (7.8%) of Project-Based Section 8 housing residents. Hispanic residents were just over 14% of Plano's population in 2013. The share of Hispanic households differed significantly by type of publicly supported housing, with Hispanic households comprising 0% of Public Housing households and 3.5% of HCV households. Hispanic households represented a much larger share of those in Project-Based Section 8 housing, however, at more than 11%, still less than the share of the general population that was Hispanic in 2013. Asian/Pacific Islander households comprised around 17% of the overall population and 0% of residents living in public housing. Significant shares of Asian/PI residents live in Project-Based Section 8 (20%) and other multifamily housing (53%). Figure 164 and Figure 168 above discuss in greater detail the demographic composition and location of publicly supported housing in Plano.

	(Plano, TX CDBG, HOME) Jurisdiction	
	Current	
Race/Ethnicity	#	%
White, Non-Hispanic	153,037	58.12%
Black, Non-Hispanic	19,639	7.46%
Hispanic	38,466	14.61%
Asian or Pacific Islander, Non-Hispanic	44,991	17.09%
Native American, Non-Hispanic	841	0.32%

Figure 169: Demographic Trend of Plano, 2013 HUD Table 2

(Plano, TX CDBG, HOME) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	7	33.33%	14	66.67%	0	0.00%	0	0.00%
Project-Based Section 8	76	59.38%	10	7.81%	15	11.72%	26	20.31%
Other Multifamily	113	38.05%	9	3.03%	15	5.05%	157	52.86%
HCV Program	232	35.58%	379	58.13%	23	3.53%	17	2.61%

Figure 170: Publicly Supported Households by Race/Ethnicity of Plano, (HUD Table 6 IMS/PIC, TRACS, 2016; LIHTC 2014)

Families with Children in Plano and Publicly Supported Housing

Figure 171 and Figure 172 compare numbers for families with children throughout Plano and within its publicly supported housing. A smaller percentage of households in each type of publicly supported housing is comprised of families with children than in the overall population. A large portion of housing units in both the other multifamily category and Project-Based Section 8 housing have one bedroom or fewer, meaning that they would seemingly be ill-suited to families. In addition, less than a third of each publicly supported housing type in Plano is comprised of units with at least three bedrooms, meaning that large families might have a difficult time finding appropriate publicly supported housing to fit their entire family.

Family Type	(Plano, TX CDBG, HOME) Jurisdiction	
	Current	
	#	%
Families with children	35928	51.11

Figure 171: Plano families with children, (HUD Table 1, 2013 ACS)

Housing Type	(Plano, TX CDBG, HOME) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	0	0.00%	0	0.00%	22	100.00%	16	72.73%
Project-Based Section 8	130	100.00%	0	0.00%	0	0.00%	0	0.00%
Other Multifamily	302	97.73%	0	0.00%	0	0.00%	0	0.00%
HCV Program	243	35.42%	192	27.99%	227	33.09%	303	44.17%

Figure 172: Plano's publicly supported housing by bedrooms and households with children (HUD Table 11, IMS/PIC, TRACS, 2016; LIHTC 2014)

Persons with Disabilities in Plano and its Publicly Supported Housing

Figure 173 demonstrates that a smaller percentage of the publicly supported housing stock is occupied by persons with disabilities than is the case for the general population. This is true for all the publicly supported housing programs, but especially the Housing Choice Voucher program, where about 30.47% of households included persons with disabilities. There are persistent problems for persons with disabilities seeking affordable, accessible housing. This is reflected by the small percentage of housing units occupied by persons with disabilities that were fully

wheelchair accessible, as well as the fact that accessible housing is insufficient in the region to meet the needs of persons with physical disabilities, especially within lower income housing (Garnett, 2017). In addition, respondents over the course of public participation mentioned that the types and sizes of housing for persons with disabilities are extremely limited and that supportive services offered at the moment are not sufficient.

(Plano, TX CDBG, HOME) Jurisdiction	People with a Disability	
	#	%
Public Housing	0	0.00%
Project-Based Section 8	10	7.69%
Other Multifamily	6	1.94%
HCV Program	209	30.47%

Figure 173: Persons with disabilities in the various publicly supported housing types (HUD Table 15 IMS/PIC, TRACS 2016; LIHTC 2014)

c. Disparities in Access to Opportunity



Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Areas of opportunity are characterized by their ability to provide a high quality of life. The City of Plano defines a high-opportunity area as those with an area median income (AMI) greater than 80% or a poverty rate of 10% or less, as income is often closely associated with other factors that affect access to opportunity. These factors can include access to jobs, the amount of poverty nearby, transportation costs, the quality of nearby schools and low exposure to environmental hazards. Areas with the highest opportunity score well in numerous categories, proving a high-quality experience in every aspect of life.

Location of Publicly Supporting Housing

Figure 174 through Figure 176 reprise the geographical location of publicly supported households in Plano, including, public housing developments, LIHTC, other multifamily developments and HCVs. The largest concentrations of voucher holders are in south, north and east Plano. The majority of other types of publicly supported housing are in east and central Plano. These figures are compared with the maps below for each opportunity type.

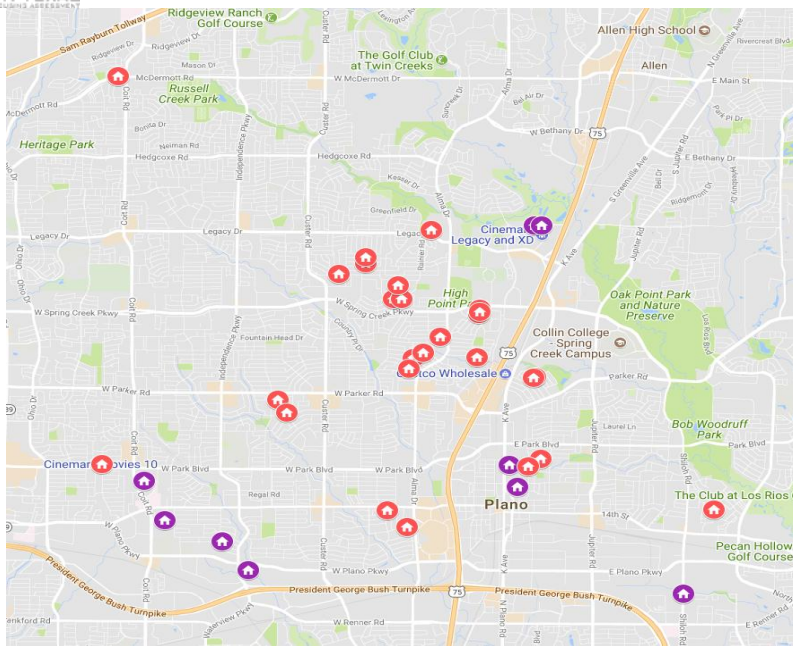


Figure 174: Locations of publicly supported housing in Plano (public housing, LIHTC, Sections 202/811, other multi-family), 2017

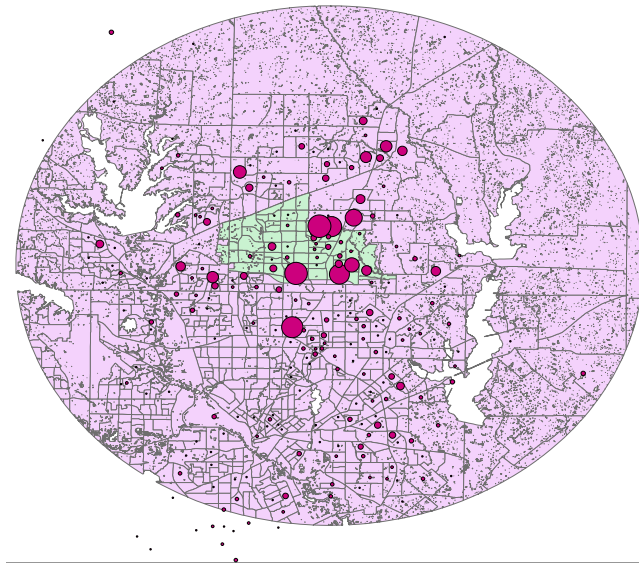


Figure 175: Locations of PHA HCV holders in the PHA jurisdiction, local data, NTRHA 2017

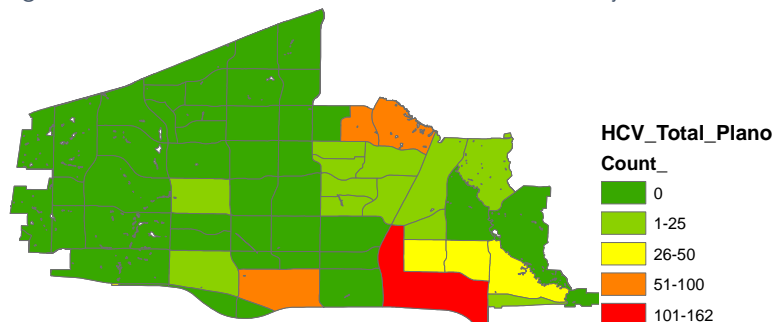


Figure 176: Locations of HCV holders in Plano, local data, 2017

Jobs

The Jobs Proximity Index uses high scores to indicate high access to jobs and low scores to indicate low access. Northeastern Plano scores show low proximity to jobs (0-60) in the census tracts with the highest rates of voucher holders. Far-east Plano, with some publicly supported housing developments, shows several areas of high job proximity (80.1-100).

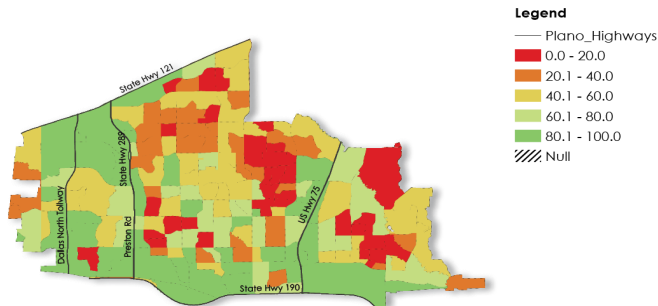


Figure 177: Plano Job Proximity Index (HUD, LEHD 2014)

Environmental Health

The Environmental Health Index measures the quality and safety of the air we breathe based on federal air quality standards. These standards were created to protect us from airborne pollutants that have been known to be harmful to human or environmental health. A comprehensive data set for Plano for this index was not available. EH scores are low (20.1-40) in southeast Plano where the greatest concentration of HCV holders is located.

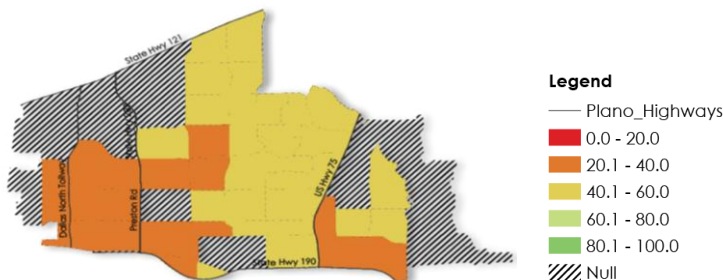


Figure 178: Plano Environmental Health Index (HUD, NATA 2011)

Poverty

The Low Poverty Rate Index measures the number of incomes below the federal poverty rate in a given census tract, where higher scores mean there is less poverty and lower scores mean there is greater exposure to poverty. In some census tracts in south Plano, the index values are low (0-20) representing a high presence of poverty. These index values correspond with the census tracts with high numbers of HCVs. Adjacent census tracts in other places in Plano fare slightly better, with index values between 40.1 and 60. Northwestern Plano census tracts score well with a low poverty score of 80.1-100.

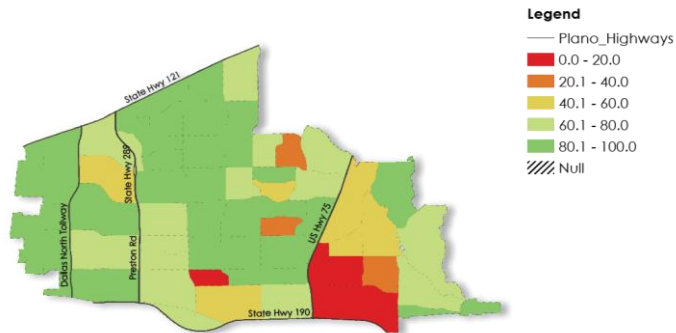


Figure 179: Plano Low Poverty Index (ACS 2013)

School

The School Proficiency Index scores levels of access to high-performing elementary schools. This index uses data on the performance of fourth-grade students on state reading and math proficiency exams to determine areas with high-performing elementary schools nearby (within three miles of the center of the block group). Higher scores indicate higher performing elementary schools. In northwestern Plano schools are performing in two ranges, medium to high (60.1-80) and high (80.1-100). Moving east, the census tracts near the LIHTC property show lower scores (40.1-60). The areas near US 75 have the lowest school proficiency ratings.

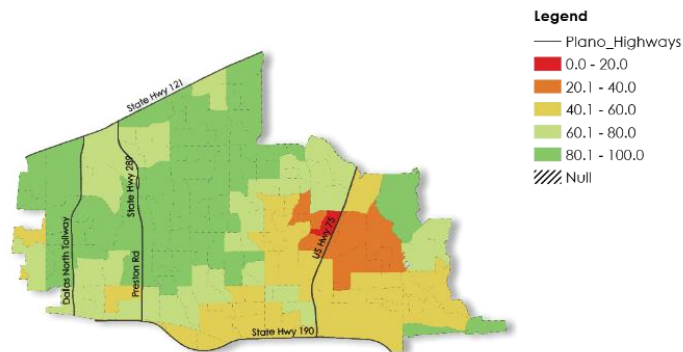


Figure 180: Plano School Proficiency Index (Common Core/Great Schools 2013-14, Maponics 2016)

Labor Market Engagement

The Labor Market Engagement Index provides a summary outlook of the residents' participation in the labor market as a result of the combination of census tract rates of higher education, unemployment and labor force participation. The higher the score, the higher the labor force participation for that census tract. Census tracts around US 75 score extremely well in labor market engagement (60.1-80). Not too far behind, higher percentages of voucher holders east of US 75 in Plano score in the 40.1-60 range.

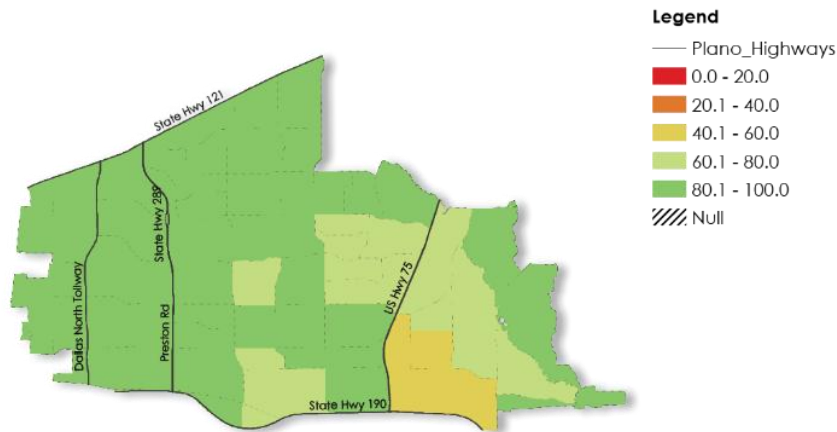


Figure 181: Plano Labor Market Engagement Index (LEHD 2014)

Transportation

Transportation was evaluated in two ways in Plano, by transit trips and transportation cost. The Transit Trip Index uses estimates of the number of transit trips taken by a three-person single-parent household whose income is equal to 50% of the median income for renters in the DFW region. The higher the index value, the higher the likelihood that neighborhood residents will use public transit. Overall, Plano residents have a medium propensity to use public transit. In most places in Plano, the scores range from 40.1-60. In the areas where large numbers of voucher holders reside, the scores decrease and fall within the 20.1-40 range.

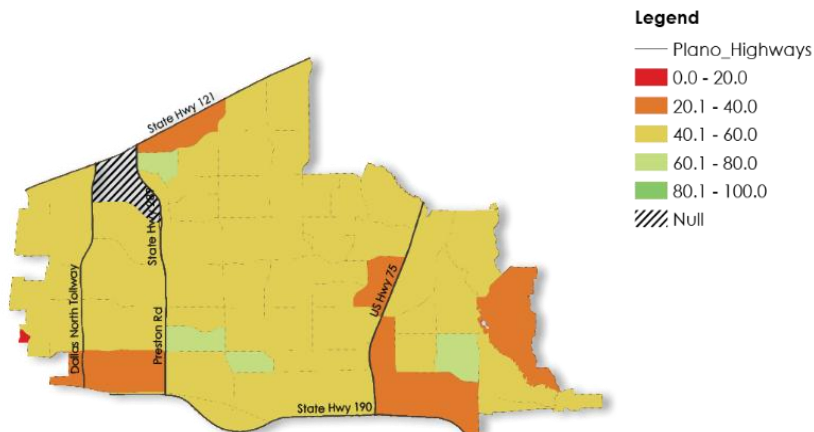


Figure 182: Transit Trips Index (HUD, LAI 2012)

The Low Transportation Cost Index uses the same three-person single-parent family whose income is equal to 50% of the median income for renters in the DFW region to determine estimates of transportation costs for a family. The lower the index value, the higher the transportation costs for residents of a neighborhood. The areas in the southwestern and southern portions of the city have relatively low (60.1-100) transportation costs. In far-east Plano and north Plano index values fall in the range of 20.1-40, and the remainder of northern areas experience higher transportation costs (40.1-80).

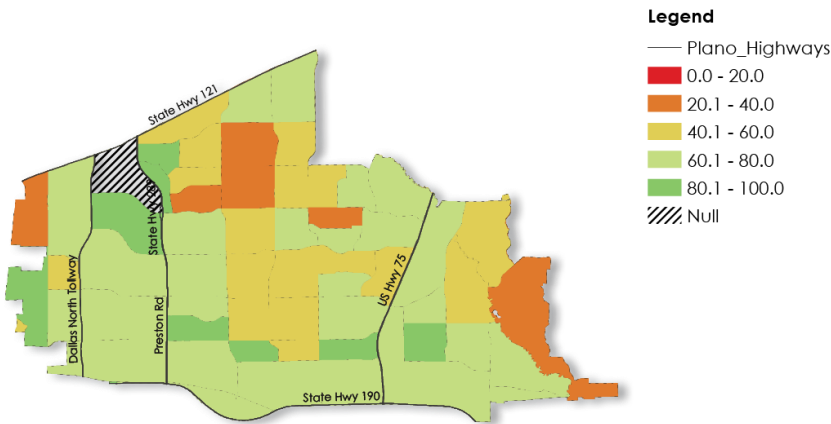


Figure 183: Low Transportation Cost index scores by census tract, (HUD, LAI 2012)

2. Additional Information

a.

Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD provided data.

The availability of Low Income Housing Tax Credit (LIHTC) units is less than the housing need for low-income Plano residents. Figure 184 compares the availability of LIHTC housing units in 2017 with the number of low-income households across major cities participating in the North Texas Regional Housing Assessment (NTRHA). Plano has 1,174 LIHTC units, or 1.1% of 109,813 Plano housing units (Texas Department of Housing and Community Affairs, 2017). This rate is lower than most of the cities in the NTRHA and less than half of the region rate of 2.4%. The need for housing is displayed in the last three columns. Eleven percent of Plano households (11,571) have annual incomes below \$25,000 in 2016 (United States Census Bureau, 2016). These households have annual incomes at or below 29% of Plano's median income and would qualify for LIHTC and other publicly supported housing. The supply of LIHTC units in Plano falls far short of the need.

NTRHA Cities	# of LIHTC Units (2017)	# of Housing Units (2017)	LIHTC Units as % of Total City Housing Units (2017)	% Total Households < \$25k annual income (2016)	Median Household Income (2016)	\$25k as % of Median Household Income (2016)
Ennis	508	6,695	7.6%	29%	\$ 43,774	57%
Cleburne	703	11,302	6.2%	25%	\$ 49,573	50%
Fort Worth	13,698	314,761	4.4%	22%	\$ 54,876	46%
Waxahachie	563	13,374	4.2%	19%	\$ 55,385	45%
Denton	2,156	52,044	4.1%	26%	\$ 50,487	50%
Grandview	24	604	4.0%	28%	\$ 44,193	57%
Greenville	428	10,971	3.9%	32%	\$ 37,304	67%
Dallas	20,116	542,928	3.7%	27%	\$ 42,215	55%
McKinney	2,262	61,220	3.7%	11%	\$ 83,257	30%
Ferris	16	864	1.9%	24%	\$ 50,150	50%
Garland	1,287	82,787	1.6%	19%	\$ 53,220	47%
Irving	1,322	96,160	1.4%	19%	\$ 54,868	47%
Plano	1,174	109,813	1.1%	11%	\$ 85,085	29%
Frisco	404	58,150	0.7%	6%	\$ 117,642	21%
Region/MSA	64,775	2,650,896	2.4%	18%	\$ 61,330	41%

Figure 184: Low-income housing tax credit units in relation to need for low-income housing

Figure 185 displays the location of Plano's seven LIHTC properties. All properties are located along the borders of Plano but only one of the properties is located in the lowest income sector in southeast Plano.

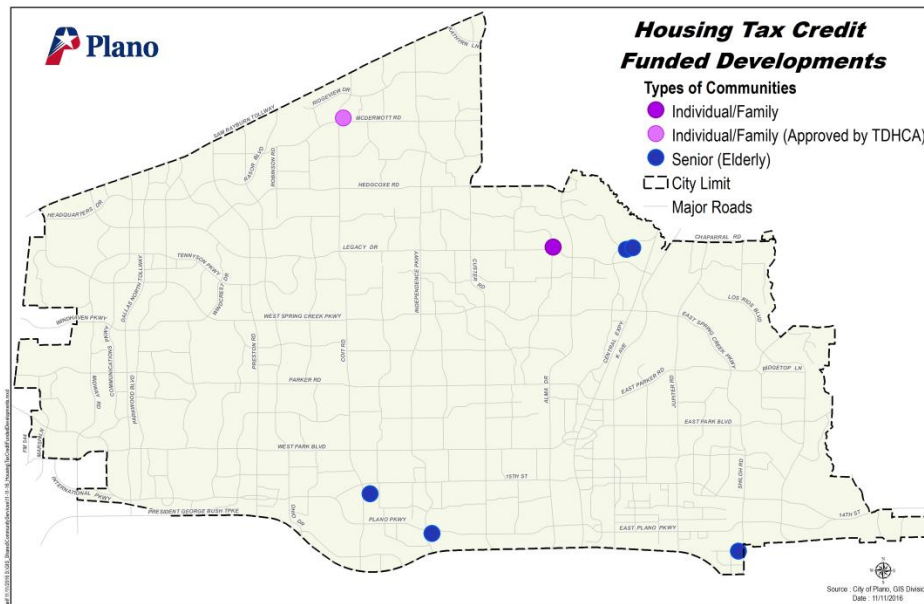


Figure 185: Location of Low Income Housing Tax Credit properties in Plano, 2017

Figure 186 provides a historical list of LIHTC properties in Plano by the Texas Department of Housing and Community Affairs board approval date (Texas Department of Housing and Community Affairs, 2017). Seventy-eight percent of 1,174 LIHTC units are reserved for seniors.

Board Approval	Development Name	Census Tract	Sector	Zip Code	LIHTC Units	Population Served	% LIHTC Units
1993	Garden Gate Apartments	316.31	northeast	75025	240	General	100%
1998	Villas of Mission Bend	318.07	south central	75075	101	Elderly	75%
5/13/04	Evergreen at Plano Parkway	318.07	south central	75075	250	Elderly	100%
7/27/05	The Plaza at Chase Oaks	316.32	northeast	75025	240	Elderly	100%
7/30/09	Tuscany Villas	316.32	northeast	75025	90	Elderly	100%
11/13/14	Villas at Plano Gateway Senior Living	319	southeast	75074	233	Elderly	80%
7/28/16	The Veranda Townhomes	316.61	northwest	75025	20	General	50%

Figure 186: Plano LIHTC projects by date approved

PHA HCV locations

Figure 187 displays the 2017 location and number of PHA Housing Choice Vouchers (HCV) in relation to the jurisdiction of the Plano Housing Authority and City of Plano boundaries. Approximately 1,000 HCVs were used in 239 census tracts. Three hundred forty-five PHA vouchers (32%) were used in six census tracts (2.5% of census tracts). Only 423 PHA HCVs (40%) were used within the City of Plano boundaries. Public comments and consultation with stakeholders

indicates that voucher holders have difficulty using HCVs within the City of Plano due to high housing costs and source-of-income discrimination.

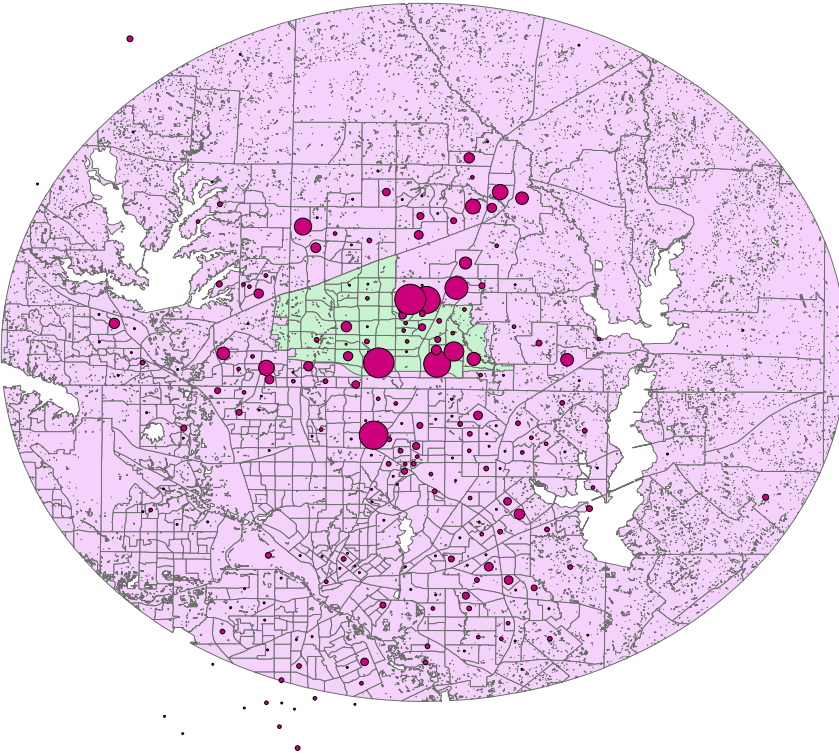


Figure 187: Locations and numbers of PHA HCVs in relation to PHA jurisdiction and City of Plano boundaries

Affordable Housing supply

Figure 188 compares the supply of housing from LIHTC, public housing authorities and low-priced market-rate rental housing with the percent of persons with incomes falling below \$25,000 per year (US Department of Housing and Urban Development, 2017; Texas Department of Housing and Community Affairs, 2017; United States Census Bureau, 2016; Manson, Schroeder, Van Riper, & Ruggles, 2017). Plano has a smaller share of Collin County low-income housing units (26%) than its share of total occupied housing units (33%), including LIHTC units (26%), housing support provided by public housing authorities (30% - HCV, PBV, etc.) and units that would be affordable to a low-income household at \$600 or less (23%). A total of 3% of Plano's housing units are LIHTC, other publicly supported and other low-price market-rate housing, but 11% of Plano's households report incomes less than \$25,000 per year and would be eligible for housing programs.

	Plano	Collin County	Plano as % of County Totals	Region (MSA)	Plano as % of Region Totals
Total Housing Units	109,813	329,455	33%	2,650,896	4%
Low-income housing supply					
LIHTC Units	1,174	4,526	26%	64,775	2%
Public Housing Authority Units	947	3,163	30%	62,737	2%
Low-cost market-rate housing	1,119	4,846	23%	103,704	1%
Subtotal	3,240	12,535	26%	231,216	1%
Subtotal: As a % of total housing units	3%	4%		9%	
Households w/income < \$25k	11%	11%		18%	
\$25k as % of Area Median Income	29%	29%		41%	
Gap: Supply vs. Low-income need	-8%	-7%		-9%	

Figure 188: Affordable housing supply compared with low-income households

Other issues affect affordable housing supply, including access to particular nonprofit developers. The City of Plano receives approximately \$360,484 per year in HOME Investment Partnerships Program funds that it directs to homebuyer assistance, homeowner housing rehabilitation, new construction and other affordable housing development purposes (City of Plano, 2015). At least 15 percent of HOME funds must be spent through Community Housing Development Organizations (CHDO). There are no CHDOs in the City of Plano, making it more challenging for the funds to be used (Eaden, Housing and Community Services Manager, 2017). Staff solicit CHDOs from other communities to fill this need.

b.

The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

Public housing: PHA owns and manages 24 single-family homes as public housing (Young, 2017). Tenants pay an average of \$512 per month plus utilities. These units are scattered throughout the community to blend in with adjacent properties. These units address the need for housing for families with a minimum of five persons who need additional bedrooms. The waiting list for these units as of January 2017 included 361 applicants. HUD funding for these public housing units is limited to \$347 per month (amount changes annually based on congressional allocation), and the program regularly operates at a loss due to continuing cuts to federal funding levels. HUD allocates separate funding for capital improvements and operations and requires that funds in each category cannot be used for any other purpose. HUD funding is inadequate to support a fund for long-term capital investments in the properties.

Development of new affordable housing: PHA was given permission to sell 26 aging public housing units and use the funding to acquire new properties to resell to qualified low-income homebuyers. The program was developed under an arrangement approved by the SAC (Special Applications Center) of HUD that pre-dated the RAD program. The gain from the sale was approximately \$1.2 million. Due to high housing costs in Plano, PHA is limited to purchasing approximately three houses at a time from this seed money, which it then sells to qualified low-to moderate-income buyers. Eventually, PHA plans to acquire and resell a total of 20 units from the sale of the original 26. TPHA expects to complete the program within the next two to three years (Burke, 2018).

Public Facility Corporation: PHA uses its Public Facility Corporation status to support increased development of affordable housing and to create sustainable income to support its activities and programs (Burke, 2018). PHA partners with developers of affordable housing, contributing its property tax exempt status to projects that further the mission of providing affordable housing. PHA also uses Public Facility Corporation status to issue bonds on behalf of affordable housing projects and receives compensation for serving as the General Partner. Compensation received helps to fill the gap left by reductions in HUD funding and to maintain quality administration and programs.

Family Self-Sufficiency: PHA operates a very small Family Self-Sufficiency (FSS) program (Burke, 2018; Young, 2017). FSS allows qualifying participants to escrow increases in income instead of increasing their rent contribution. The average pay-out at graduation from the PHA FSS program has been approximately \$15,000, which participants use for needs such as a down payment on housing or purchase of reliable transportation. Only one in five participants has graduated from the PHA FSS voucher program and become 100% self-sufficient. PHA has very little capacity to provide staff support for the program.

Senior housing: Plano Community Homes, a Section 202 development, provides service coordinators to increase the effectiveness of low-income independent living programs for seniors. Service coordinators assist residents during the hospital discharge process, help residents find affordable personal care attendants, and connect them to supportive services such as Meals on Wheels. The goal of the service coordination program is to slow functional decline and maintain seniors in independent living until they require a skilled nursing facility (Hubanks, 2017).

Mobility programs: PHA does not have the resources to fund mobility counseling programs. However, 245 vouchers from the City of Dallas are in use in the City of Plano, some of which have mobility counseling through ICP and the Walker Voucher program. Focus group participants indicate that the counseling and support provided to navigate application systems and find apartments is extremely helpful.

Violence against women: PHA partners with Hope's Door, a local domestic violence shelter provider, and the Collin County Social Services Association to provide support to housing program participants who are struggling with domestic violence. PHA staff attend training provided by the County District Attorney's office to increase the ability to recognize and appropriately respond to possible abuse (Plano Housing Authority, 2017).

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Participants in public meetings and focus groups identified public housing authority and other affordable housing provider admissions and occupancy policies and processes as significant contributing factors to barriers to accessing housing. These comments included frustration with the length of waiting lists, the criteria for eligibility, availability of information about housing programs, the difficulty of navigating application processes, language barriers and the difficulty of finding a property that meets HUD cost and quality standards.

The waiting list for PHA Housing Choice Vouchers (HCVs) includes 1,894 households as of January 2017 with applicants typically waiting up to six years for an opportunity to be considered for assistance (Young, 2017). PHA has been awarded only 923 HCVs by HUD. Waiting lists remain closed until there is a reasonable expectation of assisting households, typically considered to be a two-year time frame. All applications must be made electronically but assistance is available for persons with disabilities. The waiting list was opened for new applicants last in July 2013. At that time, 11,000 applications were received in six hours.

Applicants must renew their applications online every six months or they will be dropped from the waiting list. PHA uses an automated system to manage the waiting list and provides notice 30 days in advance of its opening via its website and local newspapers. PHA works with many local groups that help to facilitate completion of applications throughout the community.

Approximately one-third of vouchers expire due to failure to find an acceptable unit (Plano Housing Authority, 2018). Voucher holders return vouchers unused for the following reasons:

- Failed landlord background check
- Insufficient income to qualify for unit according to landlord standards
- Insufficient available units
- Inability to break lease at current unit rental

For every 50 applicants reviewed from the waiting list, less than half are placed in housing (Young, 2017). Figure 189 displays the number of applicants lost at each step in the application and review process for a recent applicant cohort (Plano Housing Authority, 2018). Failure to find a qualifying apartment where the landlord will accept HCVs is the most common reason for attrition (30%). Plano rental housing available to voucher holders is typically found in older

properties with limited amenities and some level of deferred maintenance (Young, 2017). Many of these properties do not meet HUD/PHA housing quality inspection standards.

Review steps:	Applicants in consideration:	Attrition at each step:	Attrition as % of total
Invited to attend briefing	50	8 do not attend	16%
Criminal background check (no sex offenders, violent felony or methamphetamine convictions or criminal charges directly related to tenancy)	42	6 fail criminal background check	12%
Credit check (no outstanding debts to PHAs, no outstanding utility bills, no liens, no PHA evictions within last two years)	36	0 fail credit check	0%
Families given 120 days to find an apartment	36	15 do not find a qualifying apartment	30%
Sign HAP contract and move in	21		42% success

Figure 189: Reasons for failure to move into housing for HCV applicants to PHA

Participants find that community opposition and source-of-income discrimination create barriers to publicly supported housing. Landlords refuse to accept vouchers based on negative attitudes toward voucher recipients. According to participant comments, communities oppose new affordable housing projects, limiting supply. The City of Plano 2015-2019 Consolidated Plan establishes a goal to "support new affordable rental housing units to be built by providing resolutions of support for low-income housing tax credit developments in the City with an emphasis on special needs populations" (City of Plano, 2015).

Housing available through other programs, such as LIHTC programs and housing for homeless persons, is also difficult for very low-income households to access according to comments received in public engagement. Rents for tax credit properties are typically out of reach for low-income seniors without additional tenant subsidies (Hubanks, 2017). Programs for homeless persons require documentation of literal homelessness and are not accessible to families that are homeless but unstable, doubling up with other families and frequently moving from one temporary situation to another.

Some participants anticipated the pending loss of affordable housing in the LIHTC program due to projects reaching their 15-year opportunity to convert to market-rate properties. LIHTC projects developed in the City of Plano from 1993 to 1998 (341 units) continue to appear in the TDHCA inventory (Texas Department of Housing and Community Affairs, 2017). Researchers find that most LIHTC projects do not convert at the 15-year point (Khadduri, Climaco, & Burnett, 2012). Researchers anticipate that more conversions would take place at the 30-year conversion opportunity, especially in hot housing markets. The first Plano LIHTC projects turn 30 years old in 2023.

Insufficient funding exists to meet the needs for low-income housing in the face of rapidly rising housing costs. PHA was authorized a budget of \$5,804,157 for 2017 to support its authorization of 923 HCVs or \$524 per month per unit (Plano Housing Authority, 2018). (PHA establishes its payment standards at 100% of Small Area Fair Market Rents.) PHA spent an average of \$637 per month per unit in 2017 to make up the difference between 30% of tenant income and rent, resulting in an average of only 747 households supported or 81% of its authorized vouchers. Plano apartments typically rent for \$1,200 per month while the HUD FMR maximum for a comparable unit is \$800 (with prices varying depending on bedroom size) (Young, 2017). Properties built within the last 20 years with dated amenities, quality construction and little

deferred maintenance have waiting lists of two to three months for one-bedroom apartments, two to five months for two-bedroom apartments and over a year for a three-bedroom apartment. Properties of this quality often exceed the fair market rent ceiling allowed by HUD with top quality apartments completely out of reach.

Sample comments from the appendix:

- The housing assistance place has been closed for two years. I even tried to go in with my application and still no luck.
- I applied to PHA four years ago, spent two years on waiting list and then the waiting list closed. I became homeless while on the waiting list. I have a job. Why can't I get a voucher when there are people on vouchers with no job and who use drugs?
- Our problem is the process to apply for affordable housing. It can be long and confusing, especially for elderly applicants. The process of finding and securing rental housing is overwhelming, especially if working at a job during the day and if you are not comfortable with the online process.
- Some programs require that clients meet the definition of literal homelessness. Many families don't meet this definition and as a result cannot qualify for housing because they couch surf and move frequently from one temporary housing situation to another.
- There were no homes available to rent with a voucher that met HUD housing standards.
- People don't see or know where to seek information.
- How do you qualify for housing?
- People are set up to fail in the search for publicly supported housing. Even if you qualify, there are no affordable units available. Community members at city hall meetings protest the location of publicly supported housing recipients in their neighborhoods. Voucher holders are referred only to properties in Old Plano (east of 75). Neighborhoods are hostile and racist toward people trying to use public housing vouchers.
- In Collin County, the LIHTC property owners are retaining the property without re-filing for tax credits and raising the rents.
- People need to have the laws explained to them in their language.

D. Disability and Access Analysis

1. Population Profile

a.

How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region,, including R/ECAPs and other segregated areas identified in previous sections?

The following series of maps displays rates of disabilities among the residents of Plano and the region. Maps from previous sections describing segregation and R/ECAPs are repeated here for reference, including Plano white/non-white segregation (Figure 190), regional white/non-white segregation (Figure 191) and regional R/ECAPs (Figure 192). (Plano has no R/ECAPs.)

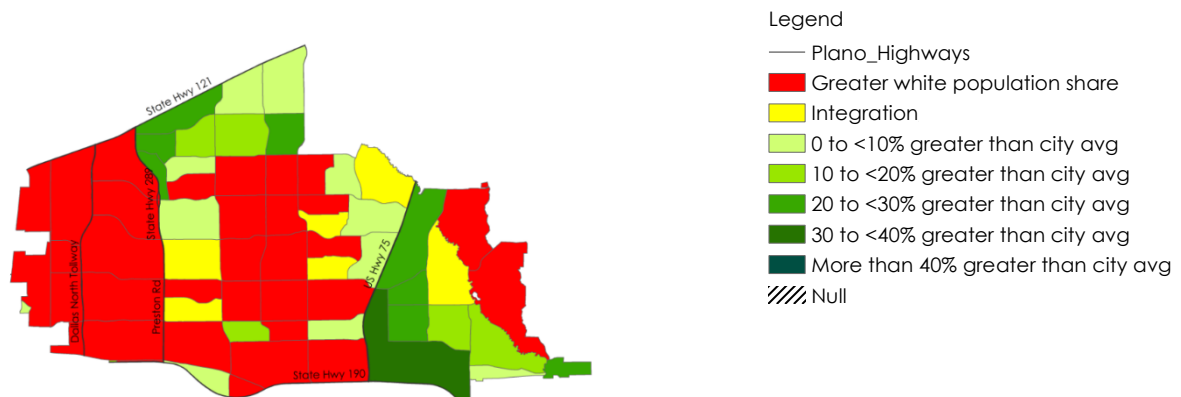


Figure 190: Plano segregation white/non-white (ACS 2015)

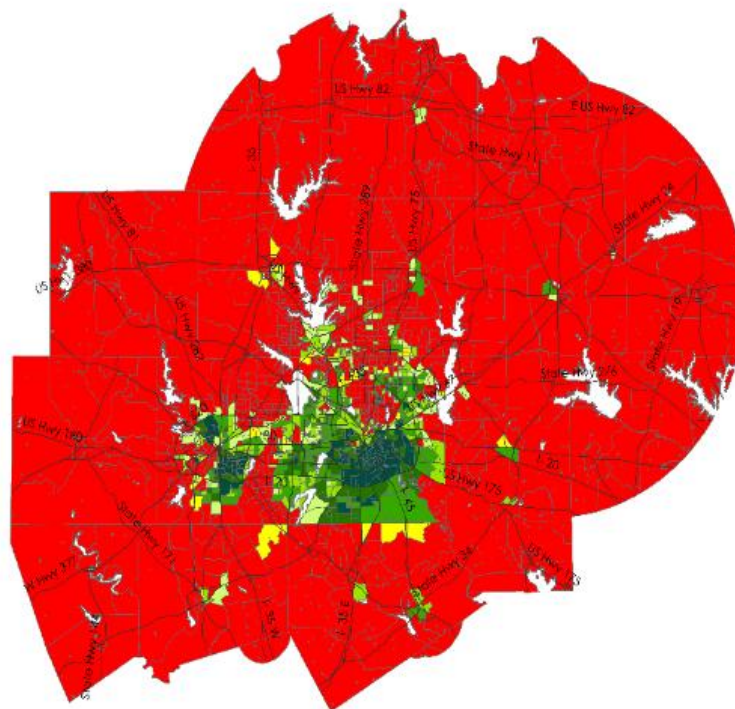


Figure 191: Regional segregation white/non-white (ACS 2015)

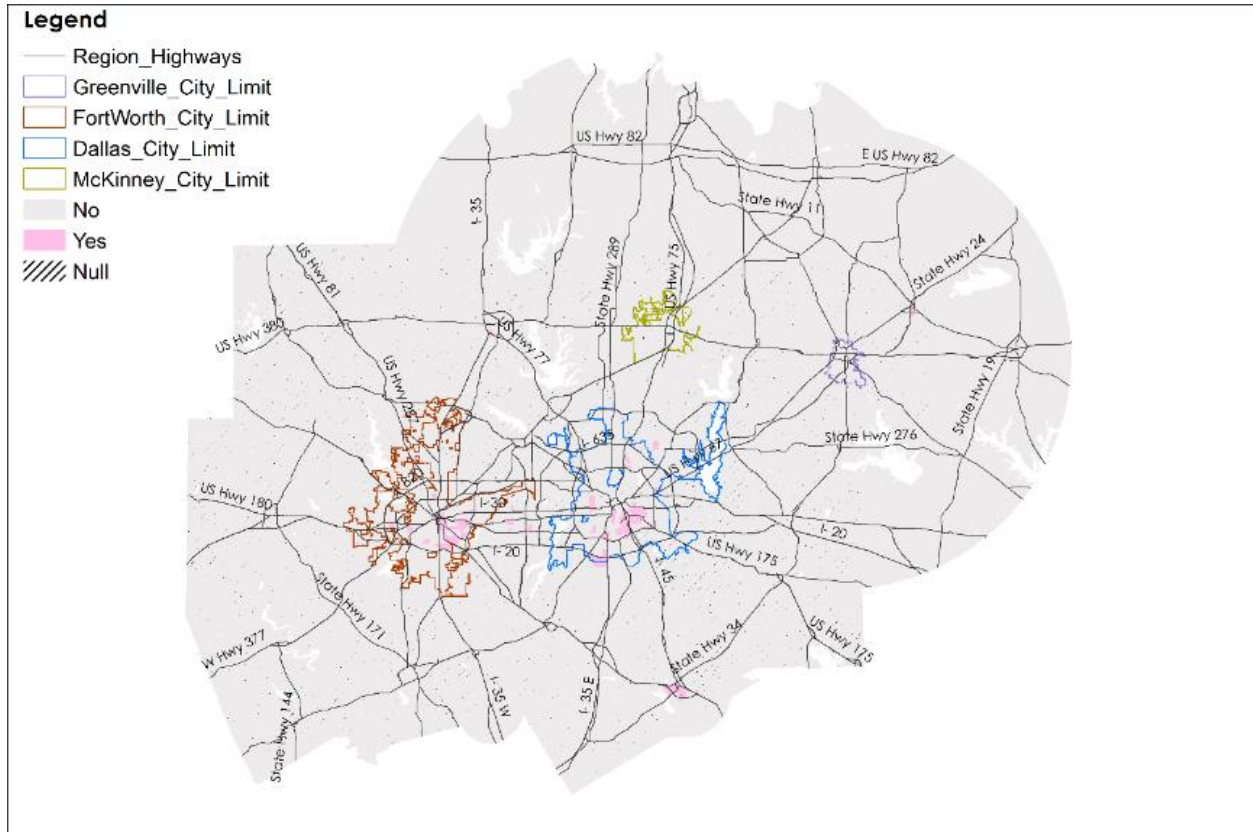


Figure 192: Regional R/ECAPs (ACS 2015)

No census tracts in Plano had over 3% of residents, age 5 to 17, with disabilities in 2013 (Figure 194). Many census tracts in central and east Plano had between 3% and 6% of working age adults ages 18 to 64 with disabilities, coinciding with many lower income communities with higher rates of minority residents (Figure 193). Census tracts with 3% to 6% of residents over age 64 are spread throughout southern, central and east McKinney (Figure 195). One census tract in south Plano has between 9% and 11% of residents over age 64 with disabilities. This area is the location of several senior housing developments, including persons needing memory care.

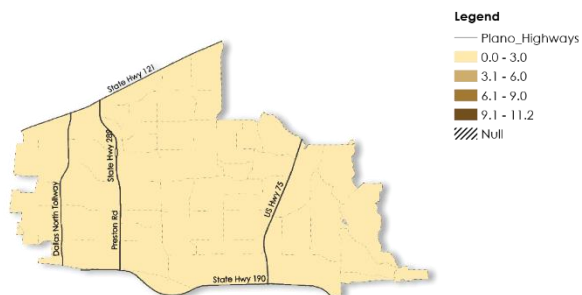


Figure 194: Plano residents age 5 to 17 with disabilities, 2013

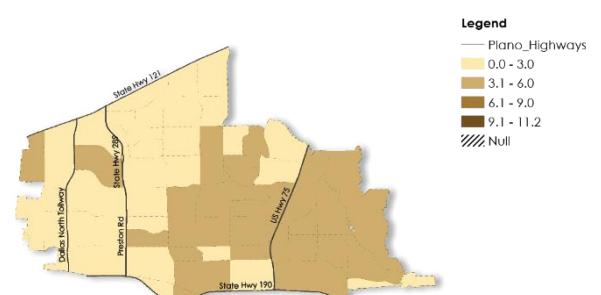
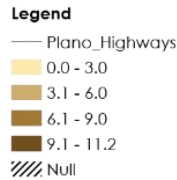
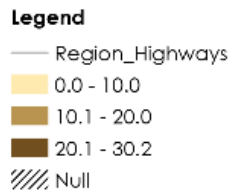


Figure 193: Plano residents age 18 to 64 with disabilities, 2013



No census tract in the region has over 10% of residents, age 5 to 17, with disabilities (Figure 196). Census tracts where between 10% and 20% of working age adult residents age 18 to 64 live in the outer, less urban areas of the region as well as in the lower income, more highly segregated sectors of Dallas and Fort Worth, including east and southeast Fort Worth, the north side of Fort Worth and southeast and northwest Dallas (Figure 197). Small pockets of communities with 10% to 20% of residents over age 64 exist in Dallas and Fort Worth, especially where senior housing, assisted living and nursing facilities are located (Figure 198). Most large areas with higher rates of disabilities among seniors live in the less urban areas at the edges of the region.



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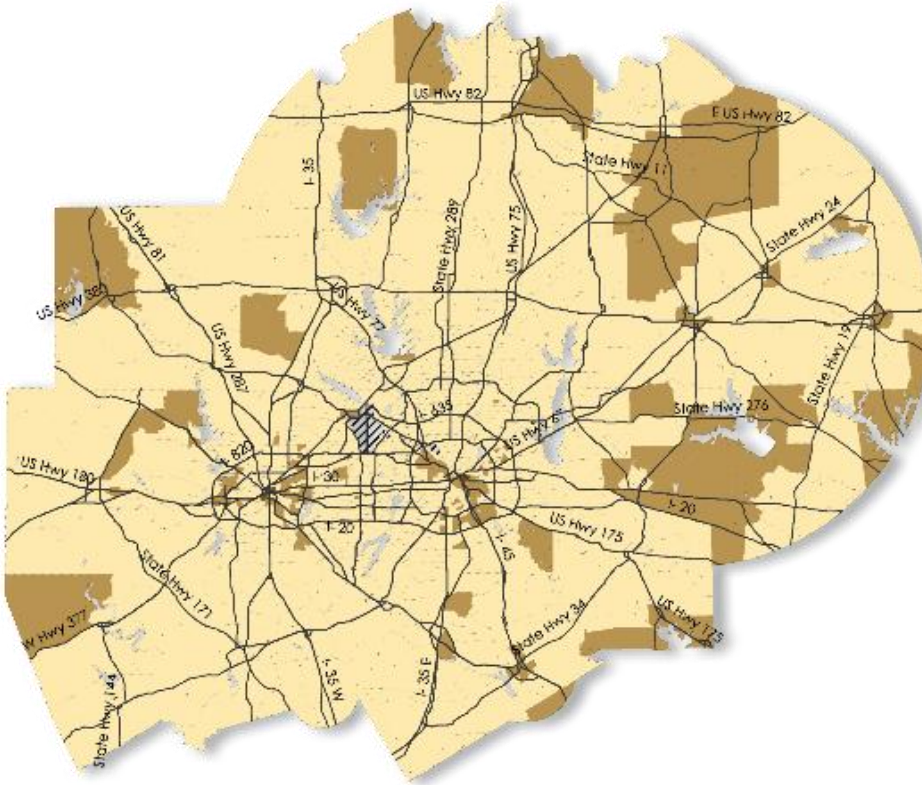


Figure 197: Percent of population age 18 to 64 with disabilities, region, 2013

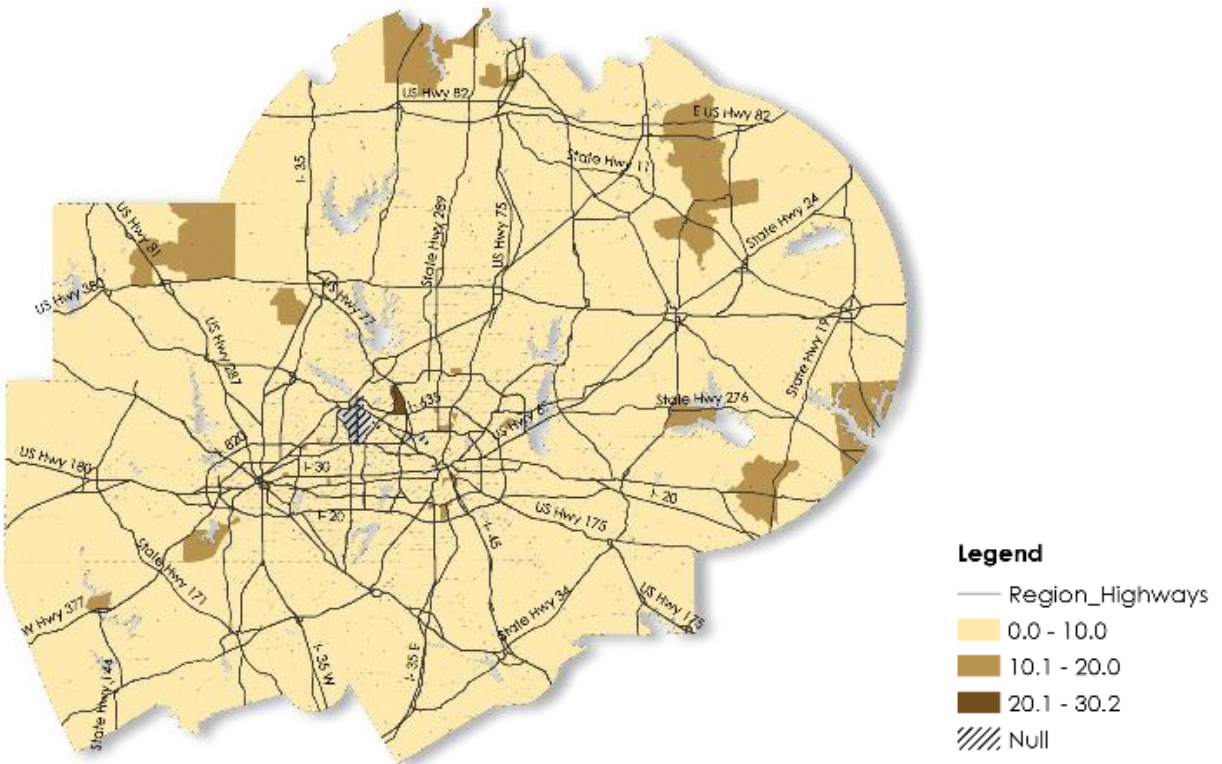


Figure 198: Percent of population over age 64 with disabilities, 2013, region

b.

Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

The following maps display rates of different types of disabilities in the general population in 2013 in Plano and the region. Locations of persons with disabilities of different age groups were discussed in the previous section above. Higher rates of persons with ambulatory and visual disabilities and with difficulties living independently tend to concentrate in areas with higher rates of persons over age 64 with disabilities and near locations of senior and assisted housing. Census tracts with higher rates of persons with ambulatory disabilities (3%-11%) are more widely spread throughout Plano than other disabilities and tend to overlap areas with higher rates of other types of disabilities. Lower income, higher minority southeast Plano has higher rates of persons with ambulatory disabilities, cognitive disabilities and difficulties with independent living.

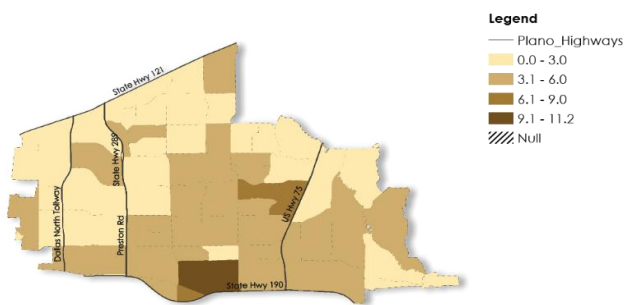


Figure 199: Plano residents with ambulatory disabilities, ACS 2013

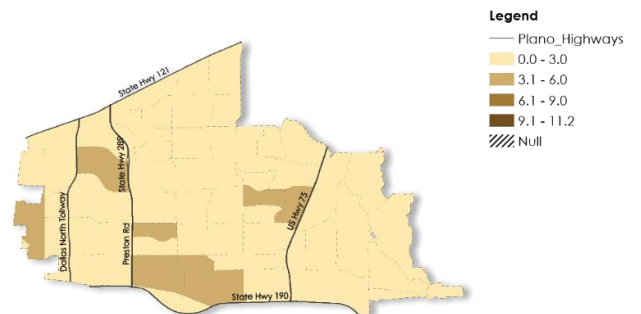


Figure 200: Self-Care disability rates for Plano, ACS 2013

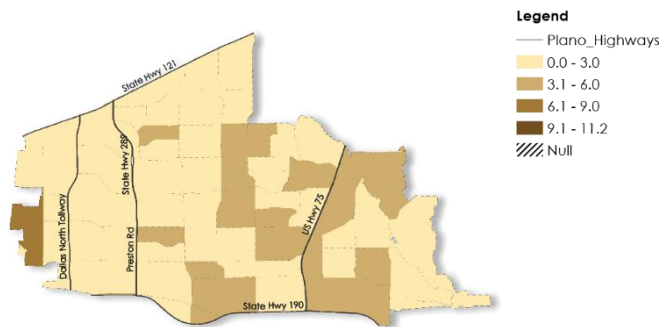


Figure 202: Cognitive disability rates for Plano, ACS 2013

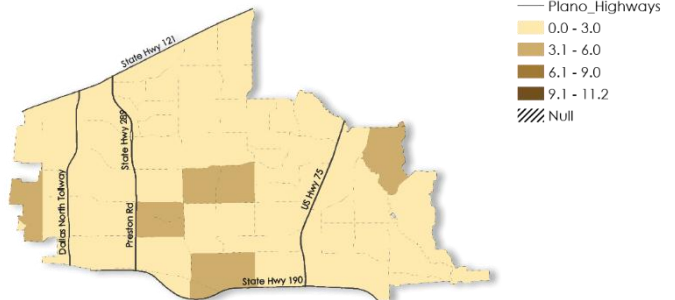


Figure 201: Hearing disability rates, Plano, ACS 2013

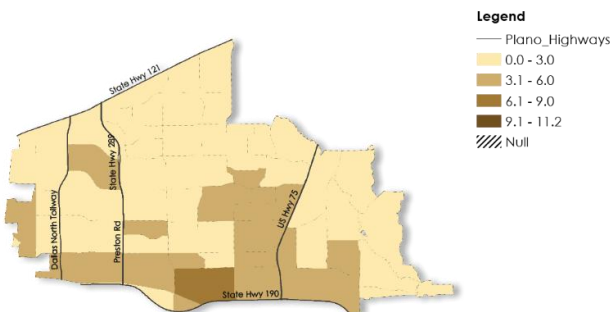


Figure 203: Plano residents with Independent living difficulties, ACS 2013

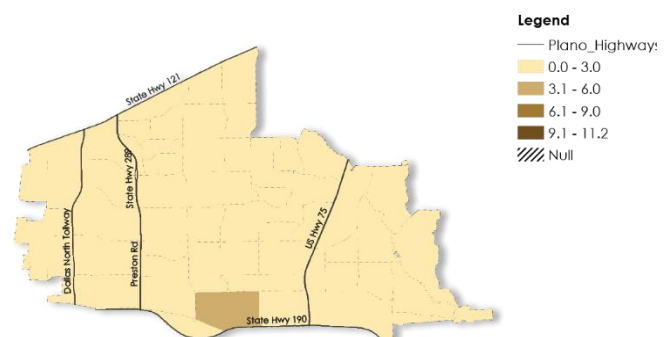


Figure 204: Visual disability rates, Plano ACS 2013

Census tracts with higher percentages of persons with ambulatory disabilities (10% to 20% of residents) occur throughout the region and appear far more common than other disabilities (Figure 205) and tend to concentrate in lower income, higher minority sections of Fort Worth and Dallas, primarily southeast. Significant concentrations of person with cognitive disabilities occur in southeast and south Dallas (Figure 206). People with independent living difficulties are also present at higher rates in southeast Dallas and the R/ECAPs located in and near downtown Fort Worth (Figure 208). Other disabilities (self-care (Figure 209), vision (Figure 210), hearing (Figure 207) show few broad concentrations at the regional level.

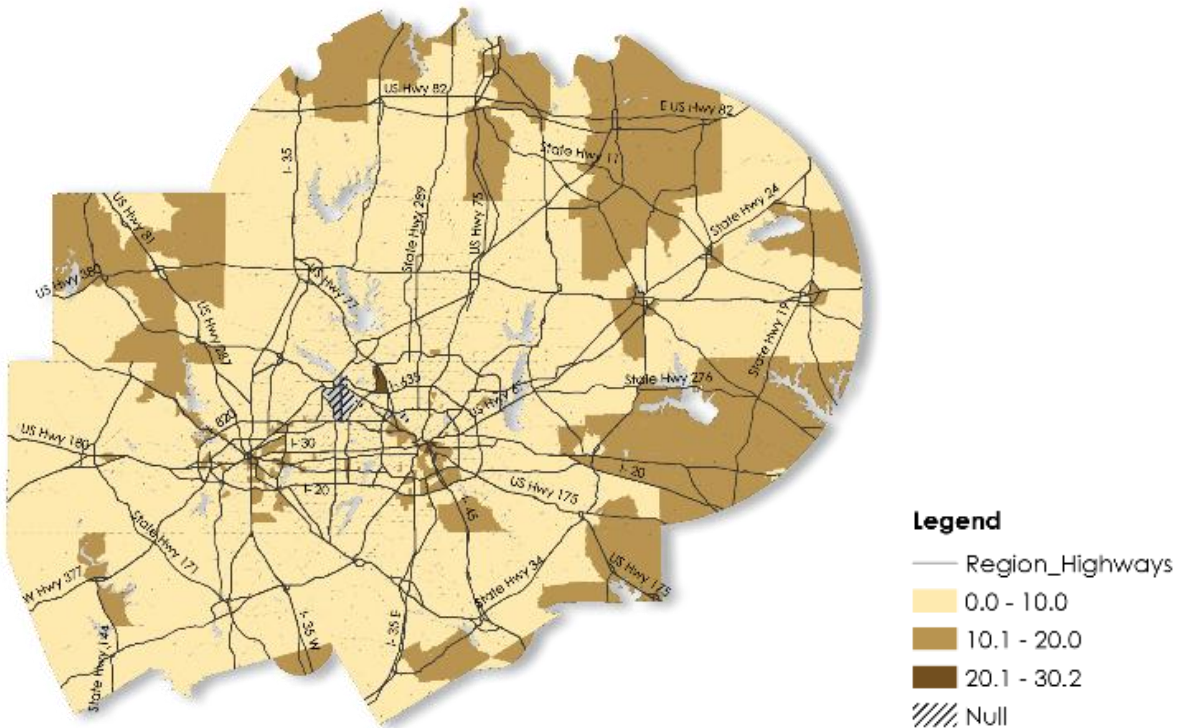


Figure 205: Region residents with ambulatory disabilities, 2013

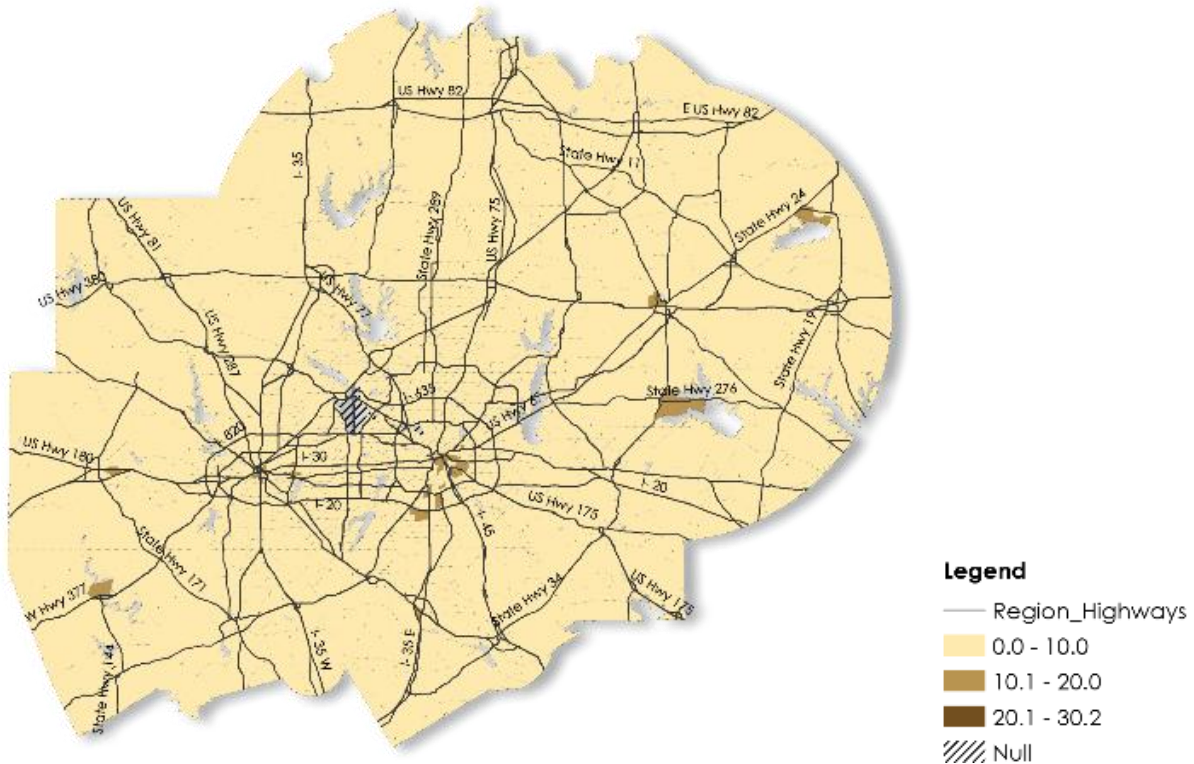


Figure 206: Cognitive Disability rates for Region

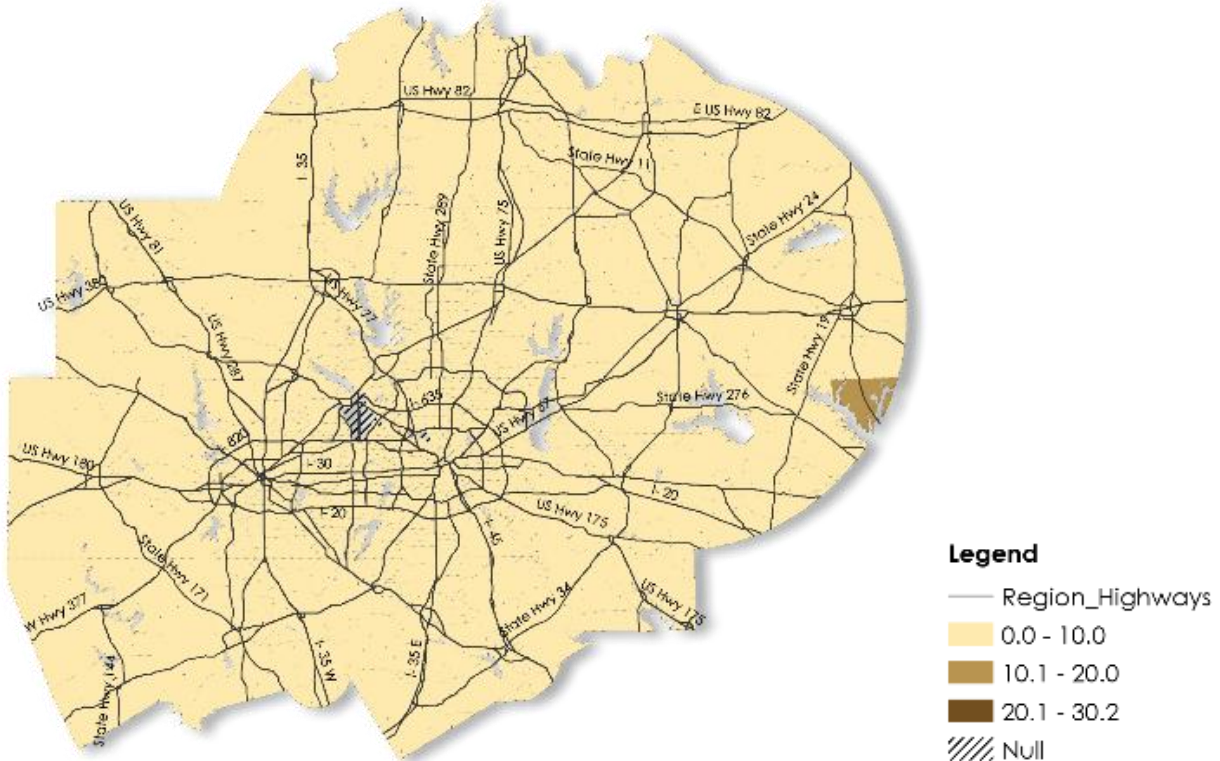


Figure 207: Hearing Disability rates for Region

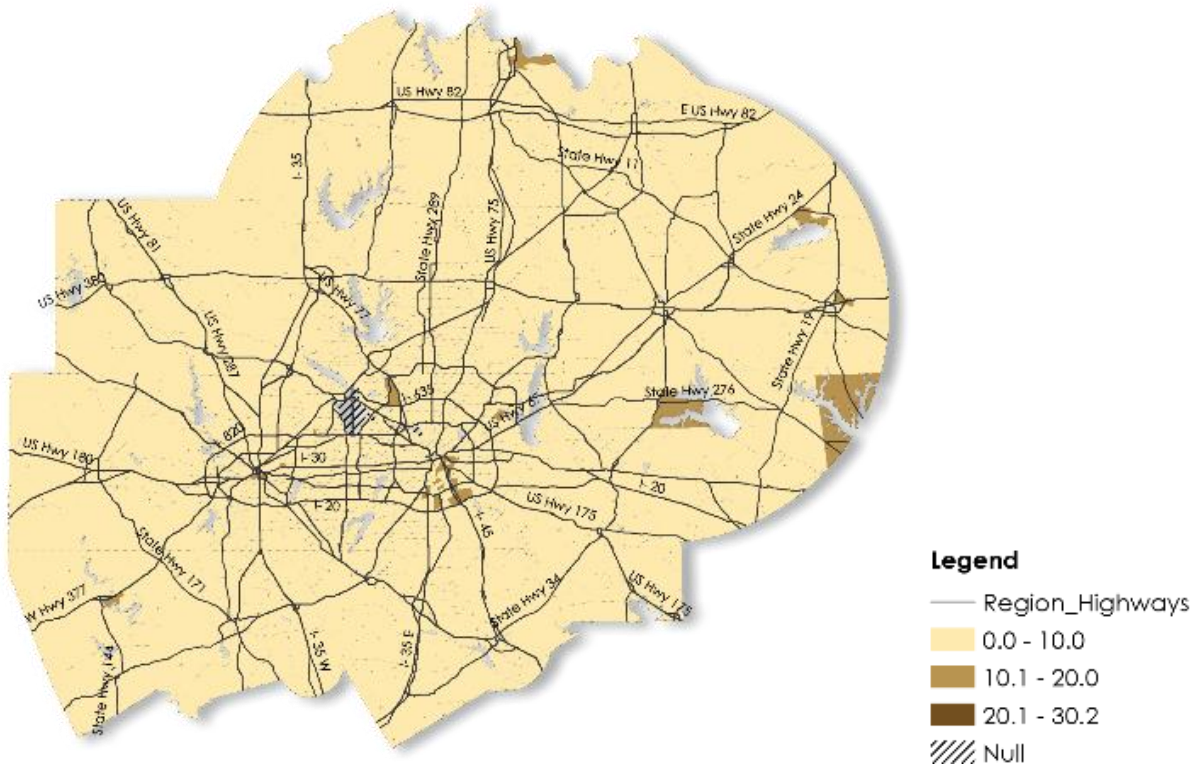


Figure 208: Region residents with independent living difficulties, 2013

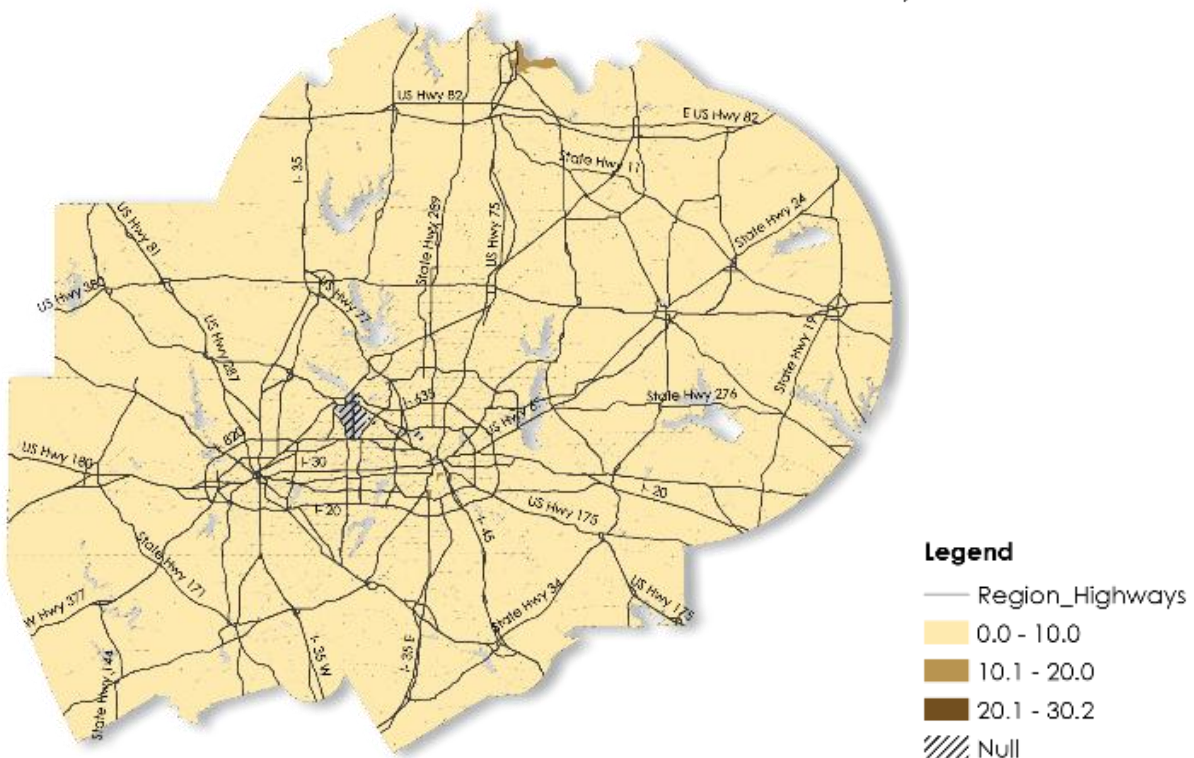


Figure 209: Residents with Self-Care difficulties, Region

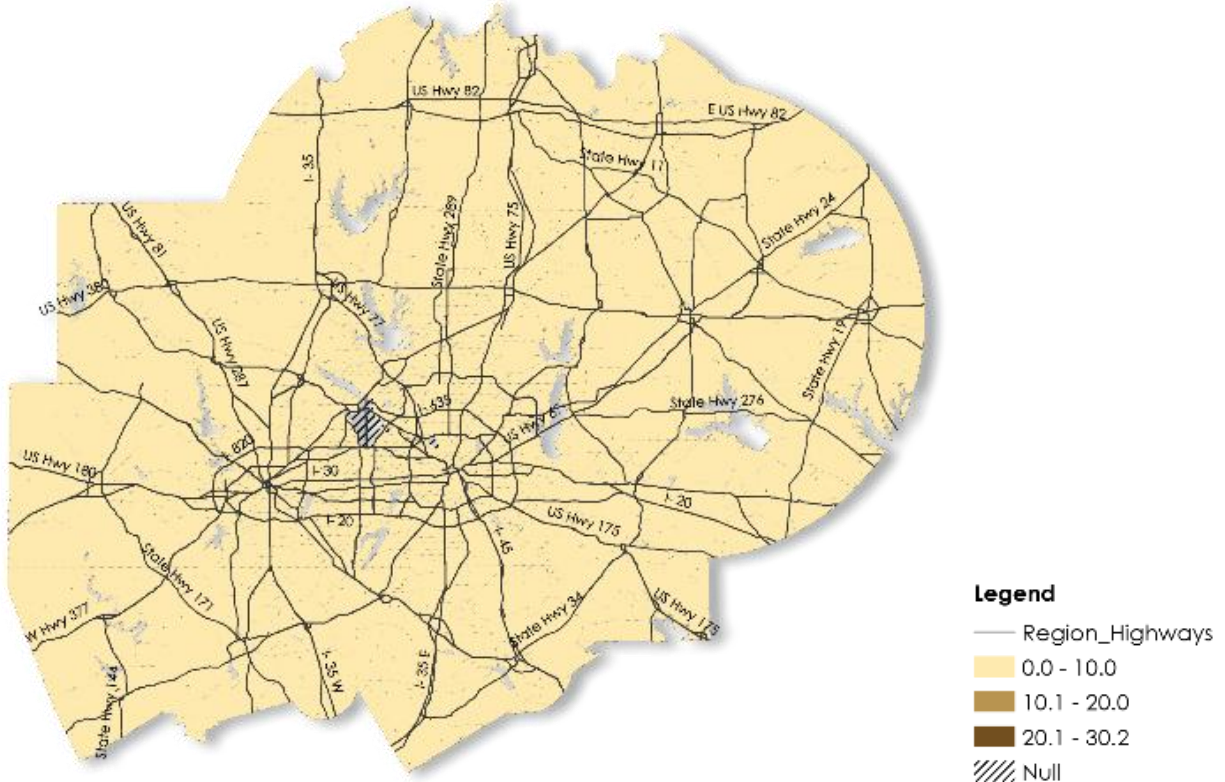


Figure 210: Persons with visual disabilities, NTRHA region, ACS 2013

Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Supplemental Security Income (SSI) is a federal income support program that provides monthly payments to persons who are disabled, blind or age 65 or over and have little or no income and assets of less than \$2,000 (Social Security Administration, 2017). Monthly payments were \$721 in 2014 or 18.2% of area median income in the Dallas Metropolitan Statistical Area (MSA). Income earned through wages decreases the monthly benefit by \$.50 for each \$1 earned (Social Security, 2018). Monthly SSI payments in the Dallas MSA in 2014 equaled 101% of the cost of an average one-bedroom apartment and 84% of the cost of an efficiency apartment (Cooper, Knott, Schaak, Sloane, & Zovistoski, 2015). Thirty-nine percent of renter households, including non-elderly people with disabilities, had incomes of 50% or less of the area median income, received no government housing assistance and paid more than 50% of their income for rent and/or lived in inadequate housing (Watson, Steffen, Martin, & Vandenbroucke, 2017). Most complaints received by Disability Rights Texas, a federally supported advocacy organization for persons with disabilities, concern inability to find affordable housing (Cohen-Miller, 2017).

Researchers found that 45% of all housing units in western U.S. metropolitan areas in 2011 had some level of accessibility for persons with disabilities but that only 0.16% of housing units were fully wheelchair accessible. Homes built before 1950 had the lowest levels of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Ninety-nine percent of housing units in the City of Plano were built after 1950, increasing the likelihood of accessibility (United States Census Bureau, 2016). Fifty-four percent of 2016 Plano housing stock was built after 1990, making it subject to federal requirements that multifamily property with four or more dwelling units must be adaptable to the needs of persons with mobility impairments (Proctor, 2018; U.S. Department of Housing and Urban Development, U.S. Department of Justice, 2013). Fifty-nine percent of housing units occupied by persons with disabilities in the western U.S. had some level of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Only 0.53% of housing units occupied by persons with disabilities were fully wheelchair accessible. Accessible housing is insufficient in the region to meet the needs of persons with physical disabilities, especially lower income housing, usually located in neighborhoods with less security (Garnett, 2017).

Approximately 7% of Plano residents reported some type of disability in the 2016 American Community Survey. Approximately 8,993 persons with ambulatory disabilities lived in Plano in 2016 (United States Census Bureau, 2016). Figure 211 uses the estimates from the HUD study of the 2011 American Housing Survey referenced above to estimate the number and percent of housing units in Plano at different levels of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015; United States Census Bureau, 2016). Forty-seven percent (47.06%) of the housing stock might be potentially modifiable to meet the needs of persons using wheelchairs. Eleven percent (11.33%) of the housing units could be livable for persons with moderate disabilities. Only 583 units are estimated to be fully accessible to persons using wheelchairs. Figure 211 also shows the estimated percent of households with members who have mobility difficulties or use a mobility device living in housing units with each of the levels of accessibility in the Dallas metropolitan statistical area, including Plano (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Households with members with mobility impairments do not necessarily live in housing units that are suited to their needs or even modifiable to meet their needs. Many Plano homes have the potential to be modified to meet those needs. The challenge is to provide modification assistance and to help persons with disabilities find and afford housing that meets their needs. The greatest barriers to full wheelchair accessibility are lack of extra-wide doorways and hallways and accessible bathrooms (Bo'sher, Chan, Gould Ellen, Karfunkel, & Liao, 2015). Higher income residents were

more likely to live in accessible units in the Dallas area (64%). Low- to moderate-income families were less likely to live in accessible housing units (43% to 47% of residents).

Level of accessibility	Est. % of housing units in western US MSAs (HUD 2011)	Est. # of housing units in Plano	Est. % of households with disabled members Dallas MSA
Total Housing Units		109,915	
Level 1: Potentially modifiable	47.06%	51,726	57.21%
Level 2: Livable	11.33%	12,453	8.99%
Level 3: Wheelchair accessible	0.53%	583	0.27%

Figure 211: Estimate of housing units by accessibility level in Plano, 2016

b. Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Figure 212 displays the results of a query for the location of apartments for rent with wheelchair access in Plano. Five hundred sixty-nine units were displayed in 35 properties, far less than the number of persons with ambulatory disabilities living in Plano. Approximately half the properties are in west Plano with nine properties located in zip code 75074, lower income east Plano (CoStar Group, Inc., 2018). Figure 213 displays white/non-white segregation in Plano in 2015 (U.S. Census). Areas marked in red have rates of white residents greater than the City average. Areas marked in green show increasing levels of disparity with the average Plano rate for non-whites. Accessible apartments tend to be clustered in areas with higher rates of non-white residents.

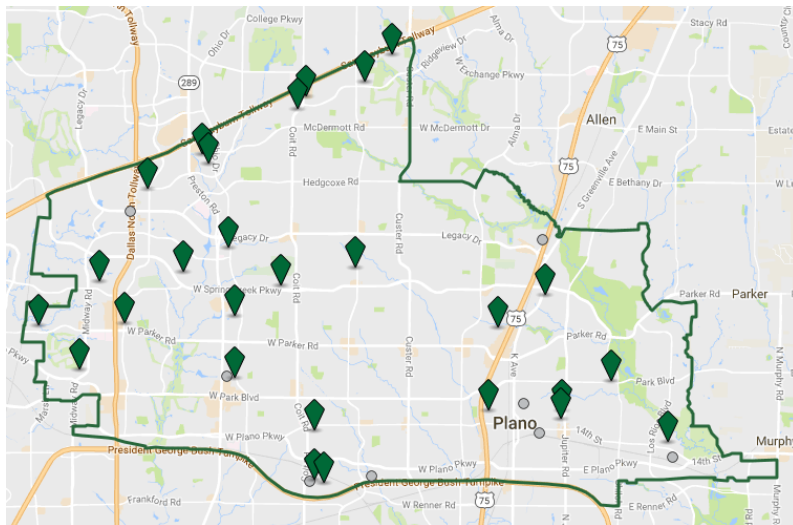


Figure 212: Location of apartments with wheelchair access in Plano

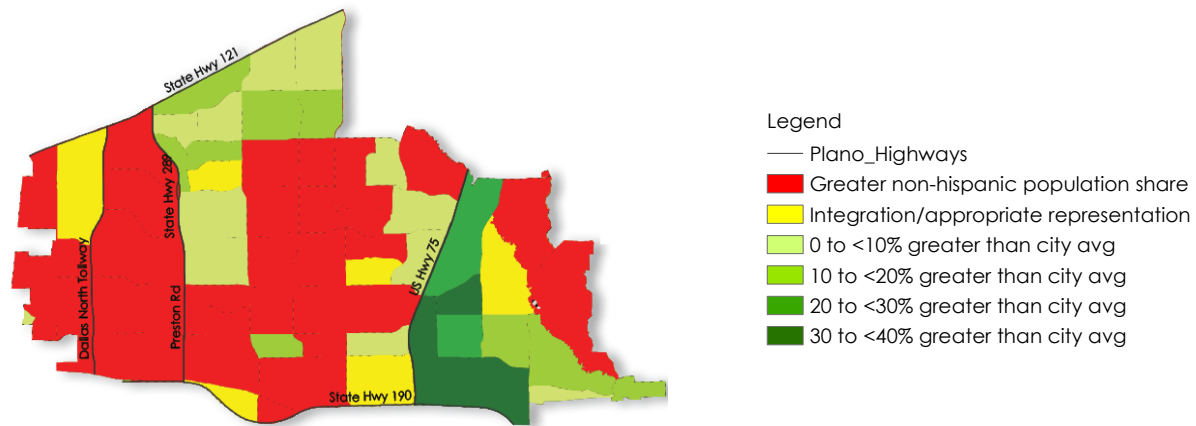


Figure 213: Non-white/white segregation in Plano 2015

Figure 214 displays an analysis of the apartment properties pictured in Figure 212 including location, starting price and availability (CoStar Group, Inc., 2018). Prices started at \$815 per month for efficiency or one-bedroom apartments. The median starting apartment rent was \$965 per month. Twelve of the properties (34%) had no availability. The average rent was highest (\$1,380) in central Plano, zip code 75023, and lowest in east Plano (\$905), zip code 75074. Current availability was lowest in the lowest income zip codes (properties with units currently available: 75074, 66% of properties; 75075, 50% available).

Apartment Name	Zip Code	Lowest Rent	Availability
Avilla Premier	75023	\$1,795	Current
Independence Crossing	75023	\$965	Current
Villas of Spring Creek	75024	\$920	Current
Marquis at Legacy	75024	\$1,002	Current
Villas at Legacy	75024	\$1,134	Current
The Lincoln at Towne Square Apartments	75024	\$850	Current
McDermott Crossing Luxury Senior Living-55+	75024	\$1,299	Current
Legacy North	75024	\$920	Current
The Grand at Legacy West	75024	NA	None
Legends at Ridgeview Ranch	75025	\$895	Current
The Ranch at Ridgeview	75025	\$1,095	Current
Riachi at ONE21	75025	\$985	Current
Kia Ora Luxury Apartments	75025	\$1,010	Current
Grove Park Apartments	75074	\$835	2 weeks
Los Rios	75074	\$873	Current
Amber Vista	75074	\$875	Current
Shiloh Park Townhomes	75074	\$1,199	Current
Oak Gate	75074	\$815	Current
The Giovanna	75074	\$835	Current
Cottonwood Grove	75074	NA	None
Whispering Oaks	75074	NA	None
Pioneer Place Senior Housing	75074	NA	None
Villas of Mission Bend - Senior Living	75075	\$1,269	2 weeks
Axis 3700 Apartments	75075	\$1,070	Current
Cityscape at Market Center	75075	\$915	Current
Evergreen at Plano	75075	NA	None
Beacon Square Apartments and Townhomes	75075	NA	None
Plano Community Homes West	75075	NA	None
Bentley Place at Willow Bend Apartments	75093	\$1,015	2 weeks
Prestonwood Hills	75093	\$909	2 weeks
Valencia	75093	\$940	Current
The Parker	75093	\$1,154	Current
Windhaven Park Apartment	75093	\$920	Current
The Preserve at Arbor Hills	75093	\$979	Current
Preston at Tulane	75093	NA	None

Figure 214: Rental apartment properties advertising some wheelchair accessible units in Plano

C.

To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Very little information documents the availability of publicly supported housing accessible to persons with different disabilities. The North Central Texas Aging and Disability Resource Center maintains a list of housing by city (North Central Texas Council of Governments, 2018). Figure 215 lists assisted living properties in Plano offering care for persons who must have supervision through the night and require assistance for emergency exit. Fifty percent of the 433 assisted living housing units in Plano are in zip code 75093 in higher income west Plano and 36% in 75023 in central Plano. Assisted living housing rents in Plano start at \$3,000 per month and are unaffordable to low-income seniors living in publicly supported housing with average annual incomes of \$10,000 (Hubanks, 2017).

Assisted Living Properties	Zip code	# of units
Allegro Assisted Living	75023	8
Avalon Residential Care	75023	8
Collin Creek Assisted Living Center, Inc.	75023	70
Creeside Alzheimer Special Care Unit	75023	56
Mission Ridge Residential	75023	8
Spring Creek Gardens Senior Living Community	75023	72
The Garden View Home	75023	7
The Waterford at Plano Assisted Living Community	75023	57
The Legacy at Willow Bend	75024	72
Compassionate Care	75025	10
North Texas Care Home	75025	8
Groom Senior Care Home	75075	9
North Texas Care Home	75075	8
Groom Senior Care Home	75093	11
Horizon Bay Assisted Living and Memory Care at Plano	75093	88
Prestonwood Court	75093	129
Silverado Senior Living – Plano	75093	56
Sunrise Senior Living of Plano	75093	114
Total units		791

Figure 215: Assisted living properties (type B) located in Plano, location and number of units

One group home for persons who are developmentally challenged is listed in Plano with eight units, a Low-Income Housing Tax Credit (LIHTC) property also funded under Section 811 for persons with disabilities (North Central Texas Council of Governments, 2018). Plano has five intermediate care facilities for persons with intellectual disabilities (a Medicaid program). Each facility serves six persons (total 30 units) with two located in 75075, two in 75023 and one in 75025. Three percent of the U.S. population have intellectual and developmental disabilities and there are not enough publicly supported housing opportunities to meet this need (Garnett, 2017).

Figure 216 displays 11 multi-family properties serving persons with disabilities listed on the North Central Texas Aging and Disability Resource Center (NCTADRC) website (North Central Texas Council of Governments, 2018). More than seventy percent of these units are in zip codes 75074 and 75075. Approximately twenty-five percent of the units are open to individuals of all ages and families, while the majority are reserved for senior citizens. Six hundred seventy-six of the 1,749 units are designated as having some level of accessibility. Very few units on the NCTADRC website are listed as being fully accessible. Very few studios and three-bedroom apartments are listed with accessibility. The properties include funding from LIHTCs, Section 202 (elderly), Project-Based Vouchers (PBVs), Housing Choice Vouchers (HCVs) and the Assisted Housing Disposition Program (AHDP). No Section 811 properties (serving persons with disabilities) are listed (Department of Housing and Urban Development, 2010). Properties that serve persons with disabilities who are not elderly are very limited. Very few units are listed with current accessibility for persons with visual and hearing impairments (North Central Texas Council of Governments, 2018).

Organization/Property name	Zip code	Total units	Population type	# of accessible units				
				Studio	1 Bed	2 Bed	3 Bed	Total
The Plaza at Chase Oaks	75025	240	ELDERLY ONLY		6	8		14
Tuscany Villas	75025	90	ELDERLY ONLY		4	5		9
Garden Gate Apartments –Plano	75025	240	INDIVIDUAL/FAMILY		40	64	16	120
Pioneer Place Senior Apartments (Sect. 202/HCVs)	75074	60	Elderly		60			60
Plano Community Homes I & II (East Campus) (Sect. 202/PBVs)	75074	129	Elderly & Disabled					129
Texas Star Townhomes (AHDP)	75074	20	Low-income					0
Woodlands of Plano (AHDP)	75074	232	Low-income					232
The Savannah at Gateway	75074	292	ELDERLY ONLY	6	10	8		24
Plano Community Homes III, IV & V (West Campus) (Sect. 202/HCVs)	75075	61	Elderly		60			60
Villas of Mission Bend	75075	135	ELDERLY ONLY		1	4		5
Evergreen at Plano Independence Senior Community (MRB)	75075	250	ELDERLY ONLY		10	8		18
Total units		1,749		6	192	101	16	676

Figure 216: Accessible units in multi-family properties in Plano (NCTCOG ADRC 2018)

Publicly assisted housing fails to meet the needs of persons with disabilities across the region, according to input from public comments and consultations. A housing navigator with the Aging and Disability Resource Center in Tarrant County explained that LIHTC developments were not being built with sufficient access for persons with disabilities and were largely unaffordable to those who could not afford \$700 in rent and double or triple deposits (Poppelreiter, 2017). She reported continually receiving phone calls from people looking for rents under \$700 per month, but the only places offering them have one- and two-year waiting lists. Assisted living settings have rules that prevent a family member from living with the person with disabilities. This is especially problematic for persons who require 24-hour assistance. Other participants in focus groups and public meetings stated that it was very difficult to get into housing programs. One participant stated that, as a single man receiving approximately \$740 in Social Security disability

income, he was always at the end of the line for publicly assisted housing (Gooden, 2017). He said that when he had finally gotten to the head of the line, the apartments that were proposed to him were located in communities with no public transportation and poor access to services. He felt that there needed to be a “separate line for people who need ADA compliant housing” because it is useless to stay on a waiting list only to find that there is no housing that meets your needs.

2. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

The lack of affordable, accessible housing can force persons with disabilities into nursing homes when they might be able to live independently with supportive services in the community (Gooden, 2017). Almost all participants in focus groups expressed the desire to live in an integrated setting in the community with a mix of persons with and without disabilities. Parents and guardians of persons with intellectual and developmental disabilities (IDDs) who participated in NTRHA focus groups were currently supporting their adult children in their own homes and expressed concerns about whether their children would be able to continue to live independently when the guardians were no longer available. Some of these guardians expressed concern that their adult children would never be able to continue to afford to live in the communities in which they grew up and had developed social connections with clubs, Special Olympics teams, jobs and friends. Medicare/Medicaid-certified nursing homes provided services to 1,423 Collin County residents in December 2017 for a bed occupancy rate of only 70.2% (Texas Health and Human Services Commission, 2017). Figure 217 lists nursing facilities and their locations within the City of Plano with a total of 1,164 beds (Texas Health and Human Services, 2018).

Certified Nursing Facilities, Plano	Zip Code	# of Beds
The Legacy at Willow Bend	75024	60
Collinwood Care Center	75074	120
Heritage Manor Healthcare Center	75075	160
Life Care Center of Plano	75075	120
The Park in Plano	75075	120
Landmark of Plano Rehabilitation and Nursing Center	75075	160
The Healthcare Resort of Plano	75075	70
Prestonwood Rehabilitation & Nursing Center, Inc	75093	132
Carrara	75093	112
Accel at Willow Bend	75093	110
Total		1,164

Figure 217: Certified nursing facilities in Plano

Figure 218 compiles publicly supported housing offered for persons with disabilities from the figures above in Plano⁶. Options for persons with disabilities are limited, especially for those with intellectual and developmental disabilities. Nursing facilities are the most available yet offer the most segregated living setting. Nursing facility placement for persons with disabilities has been shown to contribute to physical and mental deterioration in environments where sexual assault and abuse are problems (Cohen-Miller, 2017).

Type of housing	Number of units/beds
Certified nursing facilities	1,164
Low-income accessible - Elder housing	147
Low-income accessible - Elder and disabled	129
Assisted Living	791
Group Home – Intellectually challenged	8
Intermediate Care Facility/Intellectual Disabilities	30
Total	2,269

Figure 218: Summary of low-income, accessible congregate housing, Plano

Participants in focus groups preferred community-based housing but also wanted to live near others who were also disabled for mutual support. One focus group participant had designed a small community of “villas” where persons with disabilities could live in their homes with their own families while sharing personal care assistants and other resources. Some families with higher incomes are developing and using “ranches” that provide supported independent living for persons with IDD, an example of the movement toward protected, community living for persons with disabilities (Down Home Ranch, 2018; Marbridge Foundation, 2018). Costs to live in these communities are \$3,600 per month, private pay only. Families in public participation stated that even these programs were not right for everyone and required the individual to live two to three hours away from family.

Group homes, sometimes called community care homes, for persons with disabilities are sometimes subject to special restrictions for spacing or fire safety in local zoning ordinances, affecting their location. A body of case law now maintains that restrictions on family homes used to house small groups of persons with disabilities may not exceed restrictions on other family homes unless there is a legitimate government interest (Cohen-Miller, 2017). *US v Beaumont* ruled that a half-mile separation between community homes was overly restrictive (*United States v. City of Beaumont, Texas* (E.E. Tex.), 2016). Group homes, known as Household Care Facilities in Plano, are permitted by right in all residential zoning districts without any special requirements for spacing or construction (City of Plano, 2018).

⁶ Figures reported here are from state and federally funded organizations responsible for documenting programs for persons with disabilities. They are not exhaustive assessments of the availability of accessible housing. Some missing data may be due to lack of information. There is very little publicly available data on the accessibility of housing units, even in publicly supported housing. All Federally assisted new construction housing developments with five or more units must design and construct 5 percent of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. An additional 2 percent of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities. (U.S. Department of Housing and Urban Development, 2018).

b.

Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Medicaid and Social Security disability income are the most important resources for persons with disabilities in Texas (Garnett, 2017). Texas offers many programs to provide housing and supportive services to persons with disabilities varying by age and type of disability; however, most are not entitlement programs and have extensive waiting lists. Texas publicly supported options include the following (Texas Health and Human Services, 2018; Texas Health and Human Services, 2018):

- State Supported Living Centers for persons with Intellectual and Development Disabilities (IDD) (cost \$232,000 per person per year, 60-460 residents); none located in Collin County (Texas Council for Developmental Disabilities, 2017)
- Intermediate Care Facilities for persons with Intellectual and Development Disabilities (cost \$54,000 per person per year, range from six- to 60-person facilities or homes) (Texas Health and Human Services, 2018)
- Home and Community-based Services (HCS); group homes for up to four IDD residents (cost \$63,000 per person per year); includes supported home living services; 90,847 on state wait list, wait length up to 13 years (Texas Health and Human Services, 2018)
- Supportive Services provided to persons with disabilities living independently or with family members in the community:
 - Community Living Assistance and Support Services (CLASS) (cost \$15,000 per person per year) (64,906 on Texas state waiting list, length of wait up to 12 years)
 - Consumer Managed Personal Attendant Services (sliding scale with some cost paid by consumer) (optional program varies by county)
 - Deaf Blind with Multiple Disabilities (357 on waiting list, length of wait up to two years)
 - Medically Dependent Children Program (18,018 on waiting list, up to five years wait)
 - Primary Home Care, Family Care, Personal Care Services, Community Attendant Services programs – provide personal assistant services; no waiting list, limited services
 - Texas Home Living (70,714 on waiting list, length of wait up to nine years)
 - Star Plus – managed care (10,116 on waiting list, wait one year)
- Independent Living Centers – provide advocacy, information, referrals, training, peer counseling, transition support from nursing facilities to community, assistive equipment loan – regional network of offices, including REACH of Plano (REACH, Inc., 2017)
- North Central Texas Aging and Disability Resource Center – maintain network of housing assistance providers through partnerships with government and nonprofit agencies; provide referral assistance and resource links (North Central Texas Aging & Disability Resource Center, 2018)
- Plano Housing Authority (no supportive services) – public housing (one available unit accessible for persons with disabilities) and Housing Choice Vouchers (dependent on market availability of accessible units)
- Project Access Program – for persons transitioning from nursing homes to independent living who also qualify for the Tenant Based Rental Assistance program; must be HCV or HOME TBRA availability; provides relocation contractors to coordinate with service coordinators (Texas Department of Housing and Community Affairs, 2018)
- Oxford House – Oxford House is a nonprofit corporation offering a network of peer-managed sober-living homes for persons recovering from alcohol and drug addiction (Oxford House, Inc., 2018). Three Oxford Houses are located in Plano with a total of 21

beds and one current vacancy. Homes are located in zip codes 75023, 75074 and 75075 (Oxford House, Inc., 2018).

- Community for Permanent Supported Housing – CPSH is a nonprofit organization that offers training and assistance to persons with IDD and their guardians who are preparing to live independently in the community. Project Independence is a transition program that guides guardians through the process of finding housing and supportive services for community-based living (Community for Permanent Supported Housing, 2018).
- Neighborhood Homes is a program funded by the Dallas Housing Authority to provide subsidized rent through Project-Based Vouchers for housing with a minimum of two bedrooms and two residents with disabilities. PBVs are issued on a competitive basis; no bids are currently being accepted (Community for Permanent Supported Housing, March 2018).

The City of Plano uses CDBG funds to provide supportive services for special needs populations, including elderly, mentally ill and persons with disabilities. During the first three years of the 2016 Con Plan, funding has been granted to Collin County Meals on Wheels (food for persons with disabilities and elderly), Jewish Family Service (assist persons with disabilities and elderly persons to maintain independence), Texas Muslim Women's Foundation (services for domestic violence victims), The Samaritan Inn (transitional shelter program for individuals and families) and Boys and Girls Clubs of Collin County (summer and after-school youth program).

3. Disparities in Access to Opportunity

a. *To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:*

i. Government services and facilities

Participants in public engagement identified needs for improvements in accessibility, including accessible parks, community event centers, public buildings and recreation centers. The City of Plano began reviewing its standards and bringing its codes into compliance with modern accessibility requirements in 1994 (Han, ADA Coordinator, 2017). Buildings constructed after 1994 are generally in compliance with the Texas Accessibility Standards (TDLR, 2018). The City let a contract for \$770,000 for technical assistance in April 2017 to conduct an ADA Self-Evaluation and update its ADA Transition Plan in compliance with changes in the ADA regulations (Han, April 24, 2017 City Council, 2017). The Self-Evaluation will focus on the oldest sections of Plano and will assess 100% of public facilities, streets and sidewalks in two sample areas. The new initiative will produce a proactive plan for bringing aging infrastructure into ADA compliance.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The initiative to develop a revised Transition Plan is responsive to needs identified by participants in public meetings and focus groups for wider sidewalks, sidewalks with ramps, accessible crosswalks and signals. Most complaints received by the City of Plano regarding public infrastructure are about parking for persons with disabilities, ramps and sidewalks (Han, 2017). The City of Plano is coordinating with Collin County Area Regional Transit and Dallas Area Rapid Transit systems in order to develop a partnership around improving the accessibility of transit stops. This initiative will emphasize the major stations at Coit Road and 15th Street and Parker Road (Han, ADA Coordinator, 2017).

iii. Transportation

Participants in focus groups reported problems with public transportation services, including lack of flexibility and lack of trained drivers able to meet the needs of persons with disabilities, especially IDD. Persons with disabilities in Plano have access to DART curb-to-curb shared ride Paratransit services and Senior Rides (discounted fares) programs. Participants reported problems with both shared ride services (Paratransit) and public transit (fixed route). Participants said that they did not have access to bus stops nearby. Some stated they did not have access to on-demand transportation. Participants complained about Paratransit rules. For example, riders must board the van within five minutes of arrival or driver will leave (DART, 2018). DART offers the Senior Rides program in Plano, which allows persons 65 years of age and older with no other means of transportation to purchase taxi vouchers at 25% of cost. No participants in public engagement referenced using Senior Rides. Many of the complaints received by Disability Rights Texas concerned the quality of service provided by state-supported non-emergency Paratransit services delegated to private companies (Cohen-Miller, 2017).

iv. Proficient schools and educational programs

Participants in public meetings and focus groups expressed general satisfaction with services from their public-school systems. In Texas, public schools must provide services to children and youth with disabilities until age 21, including transportation (Garnett, 2017). Participants were not satisfied with access to programs in community colleges and technical schools to support skills for job acquisition. Collin College offers services to students with disabilities that provide reasonable accommodations and supports but no programs targeted to help these students target and prepare for jobs other than those available to all students (Collin College, 2018).

v. Jobs

In 2015, the Legislature mandated the transition of responsibilities from the Department of Assistive and Rehabilitative Services (DARS) to the Texas Workforce Commission (TWC) and the Department of Health and Human Services, culminating in the elimination of DARS (Texas Workforce Commission, Texas Department of Assistive and Rehabilitative Services, Texas Health and Human Services Commission, 2016; The State of Texas, 2016). The transition was to begin in 2016 and complete by 2019. Stakeholders in public engagement expressed concern over the success of the transition (Garnett, 2017). Participants in focus groups for persons with disabilities identified the lack of supported employment opportunities offering supportive services and accessible environments in the workplace as a barrier to employment.

State Medicaid programs and TWC offers supported employment programs in which persons with disabilities get assistance to find and maintain competitive, integrated employment (Texas Council for Developmental Disabilities, 2018). Texas Medicaid programs began to offer supported employment in 2013 but fewer than 2% of eligible consumers have been approved for or received these services. TWC offers supported employment by contracting with community rehabilitation providers (WorkReady Texas, 2018). Medicaid-supported employment services are mediated by managed care companies that appear to have little understanding of these benefits (Garnett, 2017). State and federal law allows persons with disabilities working in sheltered workshops to be paid by the piece of work produced if the amount paid per hour is at least minimum wage. Sheltered workshops are available in the region in Tarrant County only (AMFIBI, 2018). Piece rate employment can provide important benefits to persons with disabilities but the depressed wages add to problems with the ability to afford housing (Garnett, 2017).

b.

Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

Government services and facilities and public infrastructure:

The City of Plano maintains an ADA Coordinator to receive any complaint that a program, service or activity of the City is not accessible to persons with disabilities. A phone number is provided, 972-941-7776, to make a report. The ADA Coordinator also receives requests for auxiliary aids or services for effective communication or a modification of policies or procedures to participate in a program, service or activity at the same number. Requests must be made no later than 48 hours before the scheduled event. The information to request a modification or make a complaint is posted on the City's website (Plano, 2018). The City also maintains an ADA grievance procedure, posted on its website, to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits (Plano, 2018). Complaints are requested to be made in writing but alternative methods are available for persons with disabilities. Complaints must be made within 60 calendar days of the alleged violation to the City ADA Coordinator. The City commits to meet with the complainant within 15 calendar days of receipt of the complaint and to respond in writing with a response within 15 calendar days of the meeting. Responses may be appealed to the city manager within 15 calendar days of receipt of the City's response. The city manager or designee will meet with the complainant within 15 calendar days of the receipt of the appeal and respond in writing within 15 calendar days of the meeting.

The City of Plano Building Standards Commission accepts requests for reasonable accommodations to building or fire codes when needed to provide an individual or group with a disability an equal opportunity to use and enjoy a dwelling (Plano, 2004). The City provides a form on its website to be used to submit requests for reasonable accommodation (City of Plano, 2010). All requests submitted on the required form are heard by the commission. The process requires that the applicant or group demonstrate that they have a disability as defined in the Fair Housing Amendment Act and that the accommodation be both reasonable and necessary.

The City of Plano Police Department maintains several programs that respond to the special needs of persons with disabilities. CARE (Call Reassurance) is a program of the City of Plano Police Department that helps ensure the welfare of homebound, elderly or disabled residents, including short-term illness (Plano, 2018). Residents or their guardians can register for a daily automated phone call. If the call goes unanswered, a designated contact (neighbor, friend, etc.) is automatically called. The Plano Police Department also provides a specially trained Crisis Intervention Team to respond to emergency situations involving persons with mental illness or developmental disabilities (Plano, 2018). The Take Me Home Program allows persons with disabilities or their guardians to register with the Plano Police Department for special assistance in an emergency situation in the community when the person may have difficulty communicating, giving identification or becomes disoriented (Plano, 2018). Persons are registered in a secure database with identifying information that can be accessed by patrol officers in an emergency. The State of Texas Emergency Assistance Registry (STEAR) is a registry for persons with disabilities or anyone who may need special assistance during an emergency in their home (Texas Department of Public Safety, 2017). Local emergency management offices use the registry information in different ways. There is no mention of the STEAR program on the Plano Emergency Management web page (Plano, 2018).

Transportation:

DART accepts requests for reasonable accommodations by U.S. mail or email (Dallas Area Rapid Transit, 2018). DART also provides one-on-one, personalized instruction in the use of public transit, including fixed routes, DART Rail and commuter rail (DART, 2018). DART offers Paratransit feeder service at a much reduced rate (\$.75 versus \$3.00) to and from any DART transit facility (DART, 2018). DART offers an Interactive Voice Response telephone service for scheduling Paratransit trips seven days a week (DART, 2018). Personal care attendants ride DART Paratransit free of charge, and DART vehicles are equipped to provide ramps and carry wheelchairs (DART, 2018). DART also provides a Bus Stop Improvement Request form on its website to request amenities for existing bus stops and customer service numbers to report problems with bus stops.

Jobs:

Accessibility modifications and accommodations are directed to the employer. If employers deny a request for reasonable accommodation, employees can file a complaint with the Equal Employment Opportunity Commission (Equal Employment Opportunity Commission, 2005).

Schools:

Resources exist to guide people with disabilities to get employment-related education and training such as the DADS Guide to Employment for People with Disabilities (Texas Department of Health and Human Services, 2018). The guide lists Medicaid and other state-supported programs that provide support for accessing education and training needed to support employment. The Collin College ACCESS program is designed to assist, support and enhance the students' college experience through appropriate accommodations in compliance with the ADA, including advising and tutoring (Collin College, 2018). The program provides each student the opportunity to meet with a specially trained ACCESS advisor. The program also provides an ACCESS Assistive Technology Lab.

Plano public schools must conform to state and federal regulations to offer special education and Section 504 (Rehabilitation Act of 1973) services (United States Department of Labor, 2018). Plano ISD includes information on its process for requesting services in its Student/Parent Policy Guide and on its website (Plano Independent School District, 2017). Parents are entitled to request a full evaluation for special education services in writing at any time. Parents may also request supports and services under Section 504 for students with mental or physical impairments who do not require special education. Plano ISD maintains a program for students with dyslexia and related learning problems by providing a trained teacher on each campus to assess and provide specialized instructional strategies.

C.

Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

Low income is the primary barrier to home ownership for persons with disabilities. Persons with disabilities have virtually no possibility of owning a home due to cost (Cohen-Miller, 2017). Participants in public engagement events echoed this statement. Persons who are aging in place find it difficult to maintain their homes and continue to meet city codes for property maintenance without assistance or reasonable accommodation (Cohen-Miller, 2017).

Families contemplate buying homes for their family members with disabilities, but the additional costs of maintaining a second home (taxes, mortgage and utilities) make the project unaffordable, according to participants in focus groups. The Home and Community-based Services (HCS) program provides services to persons with IDD living with their own family, in their

own home or other community-based housing such as small group homes (Texas Health and Human Services, 2018). Program participants split all costs of room and board and pay for them out of SSI benefits. SSI does not supply sufficient income for home ownership. Participants say that HCS providers in their community have been having difficulty finding affordable homes.

Project-Based Vouchers are an avenue by which developers or families could buy homes for group living and rent them to persons with disabilities and receive Section 8 rent subsidies to pay the difference between what SSI recipients can afford and the cost of operating the home. However, the Dallas Housing Authority will not permit properties that have been granted PBVs for rental subsidies to rent to family members (Troy, 2017). Section 8 does not normally permit rental of housing to family members, but the practice may be approved by the housing authority as a reasonable accommodation for a family member with disabilities. The Plano Housing Authority maintains an "always open" request for proposals on its website for developers interested in applying for PBVs. PHA will consider the request to rent to family members as a reasonable accommodation on a case-by-case basis (Young, 2018).

Participants in focus groups said the only way their family members with disabilities could own a home would be for a group of families with compatible persons with disabilities to buy a home together. Participants say that finding compatible residents as well as compatible families who will share responsibilities equally is a challenge.

Disproportionate Housing Needs

- a. *Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.*

The greatest amount of public input on disproportionate housing need for persons with disabilities came from discussions about the lack of in-home or community-based supportive services and special needs for the physical condition and features of their homes and neighborhoods. The following needs emerged from public meetings and focus groups:

- Medical support, especially in-home or community monitoring for emergencies
- Assistance to get out of bed, dress and prepare to leave the home for employment or other community activities
- Supportive environment, possibly a caregiver to live with them
- Day activity programs to prevent isolation and support community integration
- Legal support and guardianship-type services that enable supported decision-making and choice
- Supported recreation opportunities
- Safe and secure transportation meeting the needs of their disability for everyday trips (church, recreation, shopping, work, social events)
- Security – special types of locks and systems that ensure all doors are closed
- Needs for housing modifications
- Homes without deferred maintenance; freedom from worry about home repairs and maintenance (e.g. condominium properties where maintenance is provided)
- Safe neighborhoods for vulnerable people providing opportunities for exercise (walking), police and fire departments with compassion that understand special needs residents
- Close proximity to doctors' offices, grocery stores, hair salons, dentists, parks, pool; walkable communities (no highways)
- Acceptance in the community; persons with disabilities may have a difficult time initiating friendships; need neighbors who will invite them to supper, church, etc. and help them access community resources and opportunities

Many participants discussed the importance of recreation and supports that enabled persons with disabilities to get out into the community. For those not able to find employment, guardians stated that persons with disabilities need day programs that enable them to be productively active in the community shopping, dining, attending community events and recreation.

6. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region, including those affecting persons with disabilities with other protected characteristics.*

Susan Garnett, CEO of MHMR of Tarrant County and member of many organization boards and state commissions, described the situation facing families living with members with intellectual and developmental disabilities in Texas (Garnett, 2017). Middle- and upper-income families are banding together to purchase homes or apartments where their family members can live independently with supports now and after their guardians' death. Lower income families, especially the great number living in families with multigenerational poverty, have no options. They are living with their children and relatives with IDD and but face significant problems in finding and maintaining affordable housing where their family members are accepted. Ms.

Garnett gave the example of a mother with a 13-year-old son with IDD. The mother has been evicted from apartments because her son's behaviors make other residents uncomfortable. The reasonable accommodation process was not able to address the situation. Many of these lower income families are dealing with multiple family members with disabilities. Another mother who works as a waitress approached MHMR for services for her 15-year-old son and found a 12-year waiting list to get her son into the HCS program. She is unable to find and afford baby-sitters for her son and has been forced to lock him in her car while at work, checking on him frequently, jeopardizing her employment. Children are not eligible for after school services after age 13, generally, in Texas.

b. The program participant may also describe other information relevant to its assessment of disability and access

Access to supportive services:

Many participants in focus groups for persons with disabilities identified problems with the affordability of quality caregivers and personal care attendants. Parents reported having to leave the workforce in order to provide care for family members due to the lack of affordable, quality caregivers. Participants reported that low reimbursement rates for caregivers hired through Medicaid programs are a barrier to quality care. Few resources exist to assist families in developing a network of caregivers.

Reimbursement rates are universally low across the U.S., averaging slightly more than minimum wage (LeBlanc, Tonner, & Harrington, 2001). The Texas Home and Community-based Services Workforce Advisory Council (TWAC) found that Texas had among the lowest rates in the nation and that low wages seriously impaired the ability of the state to meet current and future needs for direct-support workers (caregivers) (Texas Department of Aging and Disability Services; Texas Health and Human Services Commission, 2010). TWAC found that high turnover among direct-support workers was caused by low wages, physically demanding work and the lack of health insurance resulting in the lack of opportunity to avoid or leave nursing home care. The annual 2016 mean wage for personal care aides in the Dallas-Plano-Irving metropolitan area was \$18,790, the lowest of all occupations (United States Department of Labor, 2016). The median hourly wage was \$8.83. The base wage for community attendants working in the Texas Medicaid system is \$8.00 per hour, and 54% of attendants surveyed used means-tested public assistance (e.g., SNAP) (Ginny McKay Consulting, 2017).

7. Disability and Access Issues Contributing Factors

Lack of affordable, integrated housing for individuals who need supportive services; lack of affordable, accessible housing in range of unit sizes; lack of access to opportunity due to high housing costs; and lack of affordable in-home or community-based supportive services:

Participants in focus groups specially designed for persons with disabilities and their guardians reported being able to afford between \$150 and \$700 per month for rent with most reporting around \$300. They said that housing did not exist in their community at these price points. Persons with disabilities make up a high percentage of individuals seeking affordable housing and so are disproportionately impacted by any factors that make housing unaffordable in the community (Cohen-Miller, 2017). Participants reported that affordable units were not in good condition and that landlords were not helpful in making repairs and assuring safe and healthy conditions.

Most participants with disabilities stated they would not be able to live independently without supportive services and felt they needed to be able to live near family because community-

based supportive services were not available. Participants identified a lack of affordable assisted living centers that could provide safety, supervision and meals. Persons living independently in their own homes identified a need for services that assist with delivered meals and home repair. Participants reported having to leave the workforce in order to provide supportive services to their family members.

Lack of access to publicly supported housing for persons with disabilities was identified as a significant contributing factor as well as state and local laws or policies that limit access to publicly supported housing. Participants identified an inadequate availability of publicly supported housing in their communities, forcing persons with disabilities to move away from their support systems.

The Community for Permanent Supportive Housing suggests that it is within the law for housing authorities to award project-based vouchers to homeowners who plan to provide group housing for persons with disabilities, even if one of the residents is related to the homeowner. Some housing authorities contend that recipients of PBVs (developers/landlords/owners) may not be related to any of the residents. Many guardians participating in focus groups hoped their adult children would be able to find housing in group homes or that they might collaborate with other guardians to purchase homes for their children to live in independently. The cost of purchasing an additional home in a high-opportunity community like Plano is prohibitive and additional resources and public-private cost sharing arrangements are required to implement this strategy.

Lack of access to transportation for persons with disabilities: Participants from independent living apartment projects said that, while some transportation was provided by the facility, it was inadequate. They did not have the transportation they needed to shop or participate in community recreational activities. Participants also identified problems with the service provided by local Paratransit, including long trips, overly restrictive pick-up rules and lack of drivers trained to work with persons with disabilities, especially persons with intellectual and developmental disabilities.

Inaccessible public or private infrastructure: Participants in focus groups identified the need for improvements in the accessibility of streets, sidewalks, traffic signals, bus stops and recreation centers.

Lack of assistance for housing modifications: Participants in focus groups and public meetings identified unmet needs for housing modification. The City of Plano has established several housing rehabilitation and home repair programs (described above) using both federal and city funds that may be used to modify homes for greater accessibility.

Gaps in **access for persons with disabilities to proficient schools:** Participants in public engagement identified a need for programs at the community college level to provide greater assistance to develop skills for the job market for persons with disabilities.

Laws and policies: Participants in focus groups identified barriers to using the Project-Based Voucher program to develop group homes that might include family members of the owner/developer.

Sample comments from the appendix:

- With \$730 SSI as my daughter's only income, \$300 is reasonable. What is available for \$300? Nothing!
- Want a neighborhood with friends like me to socialize with, different people to be role models, people with different hobbies, people who would exercise with us.
- We would love to have our daughter close by; she's 22 and lives at home but would like to live with two other little girls so she can do her chic thing. There's nothing remotely close

(that's affordable). She has her girlfriends, her Special Olympics team and her entire social circle. It breaks her heart to think of leaving. So my husband and I are looking to buy a home but it's difficult. We may have found something but it's a stretch. But not everyone can do that. Affordable housing, Section 8, they need that. The closest place is 2-3 hours away. And it's just horrible. I mean she'd have to leave her job, her buddies, her team, everything. There just really needs to be more that's available to them.

- My daughter cannot comb her own hair, cook for herself or maintain personal hygiene. If a fire or flooding occurred, she would freak. She can't drive and has bad motor skills.
- I believe my daughter, 21, with autism, epilepsy and intellectual disability, will never be independent. She will always need much support.
- Providers of supportive service programs, such as the Medicaid HCS program, do not buy or rent homes in Collin County as they are too expensive. We are waiting for other families in our situation that will share the cost of a house.
- Finding an accessible, affordable home is incredibly difficult. The demand is entirely greater than the supply. The lag time for getting an accessible home is years.
- Housing is very high. For a two-bedroom it was about \$2,000 and something; just for a two-bedroom.
- The places where apartments are affordable aren't very safe. The area where they (my grandson and his roommate, both with disabilities) are living in Plano you would think they are safe, but they aren't. The issues are health and safety for them. If the guys didn't have parents to advocate for them, who is there to help them make sure it's safe and healthy for them (before they move in)?
- We didn't get a chance to see the unit before move-in because the tenant moved out late. There was animal urine, the sink was leaking, there was mold, the tub had been resurfaced but the epoxy was peeling, tiles were cracked, there was a hole around the faucet you could put your hand in, a six-inch step up that was a safety hazard, actively growing mold on the air conditioning unit, no smoke detector in my grandson's room. A punch list of 30 things the day they moved in. We're still fighting with them. I'm getting ready to go to one of these TV outlets for help. My grandson is asthmatic and the active mold is a danger. It's even in all the vents. It's been a month and I went to the young girl (property manager) and said, the health and safety issues, how do you think this is going to play on the evening news with two young men who are disabled? Within two days they were in the unit making repairs.
- I am concerned that as I get older I won't be able to stay in my place since it is a two-story. I would like to see Plano build single-story townhomes.
- There's only so many apartments that are retrofitted for mobility issues. When they have only three units they can charge what they want for them. Small supply and high demand.
- Transportation service at our independent living facility is weak. We just have one bus and one van for 500 residents.
- My disabled daughter calls for a pick-up. She gets picked up 3 to 4 hours before her appointment. And if she is not on the curb on time, they will leave her there. Sometimes she has to spend eight hours, including transit time, for one appointment.
- Guardian: We have experienced challenges with transportation (Paratransit) and issues with DART. It came down to they (drivers) weren't prepared to deal with individuals who had disabilities. So he lost his wallet several times. I won't say it's been solved. I don't think the drivers have been trained. Participant with disabilities: It's kind of been rough for me. My family needs more perspective, more help. They (DART drivers) are rude to me and they need to (be) better. Guardian: We talked to DART customer service and they weren't much help.
- There are parts of Plano that are not wheelchair accessible. I get all the way down the street and find there's no curb cut or there are no sidewalks.

- Everyone in this room and in Texas who have family members that need assistance - the reimbursement rates (on Texas Medicaid programs for personal attendant care) given to caregivers are so low that it, in and of itself, is a barrier to getting quality care for our family members. I just stopped working and came home to take care of my daughter.
- From my standpoint as a single parent, there is no one who can provide all that I do for him (my son with IDD) that will allow him to live independently. And even when he does (live independently), the transition will be me. I'll be over the transition, paying the caregivers; there isn't someone to replace me right now. I'm the quarterback and that's what worries me. That one day I won't be able to do that. So now instead of five years, I'm thinking longer term because if I'm not there, there will be no one else to be the quarterback. And we did move here to be closer to family and they came together to allow me to go on vacation with my older son but it took six of them to do it for 10 days. They tried really hard and did their best but they just aren't trained to do it. It was really nice; the first time I've been able to do that in 20 years. But it took six of them to replace me. There's no one who can replace me right now.
- There is an agency that will come into your home every week to get your loved ones ready for independent living; the Coalition for Permanent Supportive Housing has a great program. The issue is when we get them ready there is no place for them to go (that's affordable). Caregivers are poorly paid and you have to be on a waiting list for a long time to get to the (Medicaid) program.

E. Fair Housing Enforcement, Outreach Capacity and Resources Analysis

1.

List and Summarize any of the following that have not been resolved

A charge or letter of finding from HUD concerning a violation of a civil rights-related law;

No unresolved findings at this time.

A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;

No unresolved cause determinations at this time.

Any voluntary compliance agreements, conciliation agreements or settlement agreements entered into with HUD or the Department of Justice;

No unresolved agreements at this time.

A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;

No unresolved letters of findings or lawsuits at this time.

A claim under the False Claims Act related to fair housing, nondiscrimination or civil rights generally, including an alleged failure to affirmatively further fair housing; or

No unresolved claims at this time.

Pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

No unresolved complaints or lawsuits at this time.

2.

Describe any state or local fair housing laws. What characteristics are protected under each law?

The City of Plano Code of Ordinances includes Chapter 9.5 prohibiting discrimination in the sale, rental, financing and provision of brokerage services for housing (City of Plano, 2018). The ordinance prohibits discrimination on the basis of race, color, gender, religion, national origin, familial status or handicap. The ordinance prohibits actions taken with the hope or expectation of profit that promote the maintenance of racially segregated housing or discourage racially integrated housing.

Certain transactions and actors are exempt from the provision banning discrimination in brokerage services:

- Rental of housing with four units or less when one is owner occupied
- Rental of a room in a single-family residence when the remainder of the dwelling is owner occupied
- Sale or rental of single-family residence when the seller does not use a professional sales person or brokerage, the sale is made without advertisement that would violate other provisions of the ordinance, and the owner owns or has interest in three single-family residences or less
- Sale, rental or occupancy of non-commercial property controlled by a religious organization to persons of the same religion unless membership in the religion is restricted by some protected characteristic

- Providing lodging by private clubs to club members, as long as lodging is incidental to the organization's primary purpose
- Renting exclusively to persons of the same gender when common lavatory or kitchen facilities are shared
- Provision of housing exclusively for persons age 55 or older

The City of Plano maintains an Equal Rights Policy to prohibit discrimination in places of public accommodation, employment practices, housing transactions and city contracting (City of Plano, 2018). The ordinance prohibits discrimination in housing transactions on the basis of race, color, sex, religion, national origin, sexual orientation, gender identity, disability status, familial status or United States military/veteran status. The following actors/transactions are exempted:

- Sale or rental of single-family house if owner does not own more than three houses at one time, limited to one transaction in 24 months unless the property has been owner occupied, and the owner does not use a professional agent to advertise or sell in a manner that is in violation of the ordinance;
- Rental of a dwelling intended to be occupied by four families or less if one of the units is owner occupied.

Fair housing practices are also governed by the Texas Fair Housing Act, Property Code, Title 15, Chapter 301 (State of Texas, 2018). Persons may not discriminate in the sale, rental, terms or conditions of housing based on race, color, religion, gender, familial status or national origin. The code includes a special section under disability that includes all aspects of sale, rental, terms and conditions, refusal to permit reasonable modifications, design and construction of multifamily dwellings (after March 13, 1991, with four or more units). The state code includes the City exemptions.

3.

Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The **Texas Workforce Commission** (TWC) accepts complaints of housing discrimination for locations other than Dallas, Fort Worth and Garland where fair housing offices are located and for complaints that have not previously been submitted to HUD (Texas Workforce Commission, 2018). TWC maintains a website with information on fair housing rights, including accessibility requirements for buildings, rights of persons with disabilities and familial status, rights in mortgage lending and sales and rental housing. Complaints may be filed via the website online form, email, U.S. mail or fax. TWC attempts to contact the alleged discriminating party requesting a response. An optional mediation process is offered to all parties. If conciliation and mediation are not possible, TWC investigates. A Charge of Discrimination is issued if a violation is found. The Texas Attorney General's Office files lawsuits against discriminating parties. TWC maintains a Civil Rights Division to enforce the Texas Commission on Human Rights Act and the Texas Fair Housing Act. The Texas Fair Housing Act requires that TWC produce an annual report on housing discrimination (State of Texas, 2018). TWC offers training and presentations to its partners on fair housing, including a fair housing self-help library, at very low cost (Texas Workforce Commission, 2018).

The **Dallas Fair Housing Office** (FHO) is a participant in HUD's Fair Housing Assistance Program and is funded to enforce local fair housing laws that are substantially equivalent to the Federal Housing Act (U.S. Department of Housing and Urban Development, 2018). The Dallas FHO receives housing discrimination complaints, investigates complaints, conducts conciliation and mediation, offers fair housing training, approves and monitors Affirmative Fair Housing Marketing Plans, maintains a list of publicly assisted affordable housing, produces a Housing and Disability Resource Guide and monitors ADA compliance for the City of Dallas and the region (City of

Dallas, 2018). Training and complaint procedures can be accessed through its website. Training is offered on a customized basis, including speaking at events such as the MetroTex Leadership Academy for real estate agents (MetroTex, 2018). Training and presentations are offered free of charge. The Dallas FHO investigates 80-100 cases per year with a staff of 12 (Favela, 2018).

The **North Texas Fair Housing Center (NTFHC)** is a participant in HUD's Fair Housing Initiatives Program and receives federal funding to provide free fair housing services (U.S. Department of Housing and Urban Development, 2018). NTFHC provides housing problem counseling, complaint investigation and training to residents of 12 North Texas counties, including Collin (North Texas Fair Housing Center, 2018). Training is available for landlords, property managers, Realtors, tenants, prospective homebuyers, city governments and nonprofit organizations on fair housing topics at no charge. NTFHC partnered with other fair housing organizations to successfully pursue a judgment against Wells Fargo Bank for allegedly providing poorer care for real estate-owned foreclosed properties in non-white communities than in white communities. The proceeds from the action are being used to fund NTFHC grants to nonprofit agencies for housing rehabilitation, housing retention in owner-occupied homes, neighborhood revitalization, accessibility modifications and down payment assistance for persons earning up to 120% of area median income. NTFHC also conducts paired testing to assess the level of unfair housing discrimination when investigating complaints. The agency has produced one report of its testing since it was formed in 2010. The paired tester study found that 37% of rental attempts by African American testers (N=27), 33% of Hispanic attempts and 20% of attempts by families with children (N=10) were met with illegal housing discrimination (North Texas Fair Housing Center, 2011). The test included properties in the City of Plano. Violations included differences in rental prices offered, information regarding availability of units, security deposit amounts, move-in specials, treatment, access to rental applications and steering.

The Plano Housing Authority refers fair housing complaints to the regional **HUD Fair Housing and Equal Opportunity (FHEO) office** in Fort Worth. The mission of the FHEO is to "eliminate housing discrimination, promote economic opportunity and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development and public understanding of federal fair housing policies and laws. FHEO protects people from discrimination on the basis of race, color, religion, sex, national origin, disability and familial status" (U.S. Department of Housing and Urban Development, 2018). HUD maintains a list of cases filed by type and name of alleged party in violation. Complaints can be filed online, by mail or phone, including accommodations for persons with disabilities. Investigations are completed within 100 days of receipt of complaint or the complainant is notified. HUD may refer complaints to local offices for investigation. The local office must begin work within 30 days or HUD reassumes responsibility for the complaint. The HUD website offers possible immediate assistance with judicial relief if a situation of irreparable harm is imminent or a clear violation exists. Services are offered at no cost. Complaints resulting in a finding of discrimination must be heard by a court within 120 days of the finding. The national FHEO organization consists of 24 offices, including programs, investigations, enforcement, administration, planning and budget, information services and communications, field oversight and legislative initiatives and outreach. The Fort Worth office (Region VI) includes two directors and an alternate contact person (U.S. Department of Housing and Urban Development, 2018).

4. Additional Information

- a. *Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.*

The City of Plano maintains information on its website regarding fair housing rights, links to resources for identifying housing discrimination and links to HUD and the NTFHC for filing fair housing complaints (City of Plano, 2018).

The City of Plano maintains an outreach system to keep the public informed about opportunities to access housing programs that provide for home repair and rehabilitation. The City distributes 5,000 postcards approximately every six months to all single-family homes at or below 85% of median housing price for the MSA, a total of 20,000 homes. Mailings are rotated by zip codes so that all targeted homes are contacted approximately every other year.

- b. *The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.*

The Texas Attorney General's Office maintains a website on tenant rights (Paxton, 2018). The website provides guidance for consumers under its Consumer Protection Division and receives complaints. Complaints may be referred to other agencies or reviewed by a compliance specialist for possible litigation. The Compliance Division will file suit on behalf of the complainant for substantiated complaints that are in the public interest.

5. Fair Housing Enforcement, Outreach Capacity and Resources Contributing Factors

Very few comments were received during public engagement regarding fair housing enforcement, outreach and resources. Most of the comments received fell under the contributing factor **local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.)**. Most of these comments related to renters not being aware of their rights as a tenant and landlords taking advantage of this lack of knowledge. Several participants said that tenants don't know their rights specifically with regard to getting landlords to make repairs.



SECTION V

FAIR HOUSING GOALS AND PRIORITIES

V. Fair Housing Goals and Priorities

1

For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Information gathered from public meetings, focus groups and stakeholder interviews was obtained and analyzed in a variety of ways to ascertain the overall importance of contributing factors to fair housing issues within each issue area and across issue areas. All comments were considered, but greater priority was placed on factors and issue areas that received repeated comments and were substantiated by local research, quantitative and GIS analysis. Related contributing factors were grouped to identify overall trends.

Plano's public meeting July 27, 2017, included an exercise that asked participants to vote for the top three contributing factors in each of four selected fair housing issue areas. Figure 219 displays the total number of votes collected within each issue area, a gross indicator of interest or concern about each area. Contributing factors to access to opportunity received the most votes (99) and fair housing enforcement, outreach and education received the least (74).

Issue Area	Total Votes
Access to Opportunity	99
R/ECAPs	93
Disabilities	86
Fair Housing	74

Figure 219: Votes by issue area, Plano public meeting 7-27-17

Figure 220 displays votes for contributing factors relating to the disabilities issue area. Lack of accessible transportation, affordable housing in a range of unit sizes, accessible publicly supported housing and affordable in-home and community-based supportive services received the most votes.



Figure 220: Votes for top contributing factors to fair housing issues for persons with disabilities, Plano public meeting 7-27-17

Figure 221 displays the votes for contributing factors affecting fair housing enforcement, outreach and education. The greatest numbers of votes were received for resources (24), enforcement by public agencies and government (21) and enforcement by private housing providers (19).

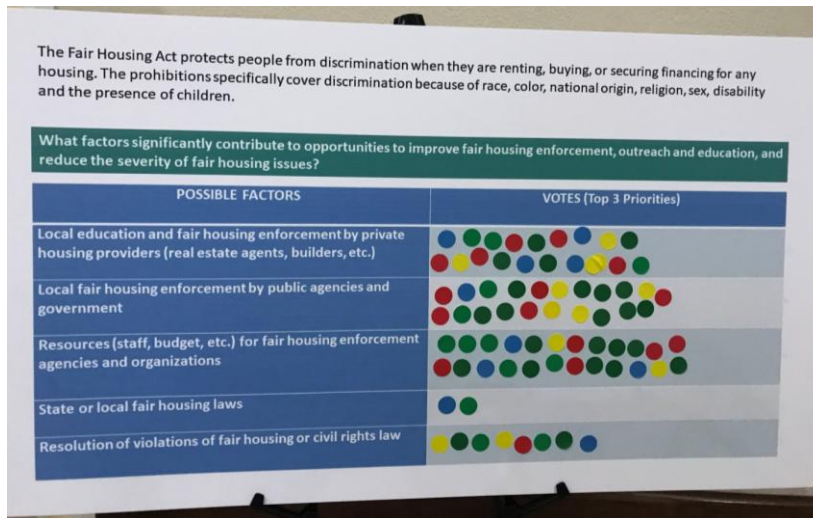


Figure 221: Votes - top contributing factors to fair housing enforcement issues, Plano public meeting 7-27-17

Figure 222 displays the votes for contributing factors to racially and ethnically concentrated areas of poverty. The greatest number of votes went to location and type of affordable housing (21), lack of investments in specific neighborhoods (17), loss of affordable housing (15) and community opposition (15).

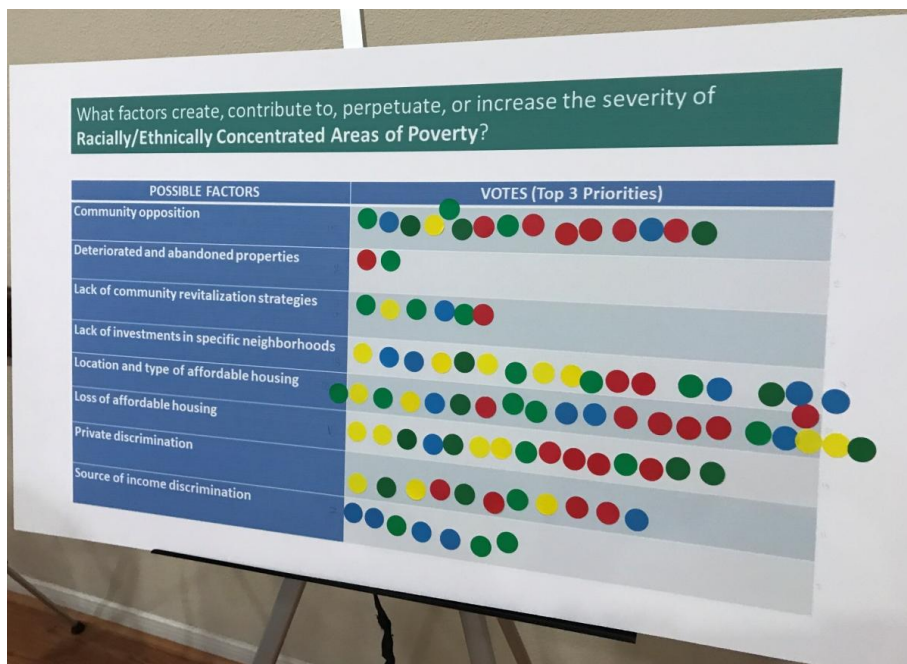


Figure 222: Votes for top contributing factors to R/ECAPs, Plano Public meeting 7-27-17

Figure 223 displays the votes for contributing factors to access to opportunity. The greatest number of votes went to the availability of affordable units in a range of sizes (28) and the location and type of affordable housing (28).

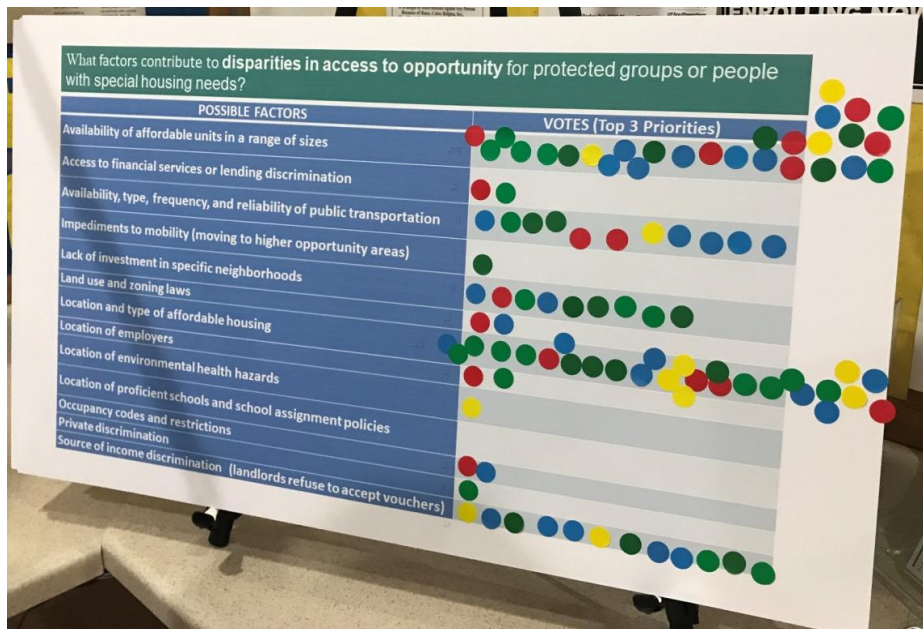


Figure 223: Votes contributing factors to disparities in access to opportunity, Plano public meeting 7-27-17

Votes were also analyzed across issue areas and grouped where they were related in order to identify overarching factors. Figure 224 displays the votes for each contributing factor sorted across issue areas in related groups. Related groups of contributing factors are pictured with a common color. The greatest number of votes was received by the contributing factors related to affordability of housing (106). These factors were believed to contribute to issues with access to opportunity, R/ECAPs and for people with disabilities.

Contributing Factor	Issue Area	Votes
Availability of affordable units in a range of sizes	Access to Opportunity	28
Lack of affordable, accessible housing in a range of unit sizes	Disabilities	15
Location and type of affordable housing	Access to Opportunity	28
Location and type of affordable housing	R/ECAPs	20
Loss of affordable housing	R/ECAPs	15
Resources for fair housing enforcement agencies and organizations	Fair Housing	24
Local fair housing enforcement by public agencies and government	Fair Housing	21
Local education and fair housing enforcement by private housing providers	Fair Housing	19
Lack of accessible transportation	Disabilities	18
Availability, type, frequency and reliability of public transportation	Access to Opportunity	11
Lack of investments in specific neighborhoods	R/ECAPs	17
Lack of investment in specific neighborhoods	Access to Opportunity	9
Lack of community revitalization strategies	R/ECAPs	6
Deteriorated and abandoned properties	R/ECAPs	2
Inaccessible public or private infrastructure	Disabilities	1
Inaccessible government facilities or services	Disabilities	0
Lack of accessible publicly supported housing	Disabilities	15
Lack of affordable in-home or community-based supportive services	Disabilities	15
Community opposition	R/ECAPs	15
Source of income discrimination	Access to Opportunity	12
Source of income discrimination	R/ECAPs	7
Private discrimination	R/ECAPs	11
Private discrimination	Access to Opportunity	1
State or local laws, policies or practices that discourage individuals with disabilities from living in apartments or other integrated settings	Disabilities	12
Resolution of violations of fair housing or civil rights law	Fair Housing	8
Lending discrimination	Disabilities	5
Access to financial services or lending discrimination	Access to Opportunity	2
Lack of assistance for housing accessibility modifications	Disabilities	4
State or local fair housing laws	Fair Housing	2
Land use and zoning laws	Access to Opportunity	2
Location of employers	Access to Opportunity	2
Occupancy codes and restrictions	Access to Opportunity	2
Lack of assistance for transitioning from institutional setting to integrated housing	Disabilities	1
Impediments to mobility (higher opportunity)	Access to Opportunity	1
Location of environmental health hazards	Access to Opportunity	1
Lack of accessible, proficient schools	Disabilities	0
Location of proficient schools and school assignment policies	Access to Opportunity	0

Figure 224: Votes for contributing factors in related groups, Plano public meeting 7-27-17

Comments received from public meetings, focus groups and stakeholder or subject matter expert interviews and consultations were summarized using qualitative analysis software and grouped by fair housing issue area and contributing factor. Figure 225 displays the approximate number of comments received from all public engagement activities for each issue area (vertical) and group of related contributing factors. Numbers of comments should be used to indicate relative importance, as many factors can affect their quantification. Groups of contributing factors are listed in terms of their relative frequency (percent of comments) within each issue area with the most frequently identified contributing factors at the top of each column. Similar colors identify related contributing factors that cross issue areas. Cells without numbers received very few comments.

Segregation (22 comments)	R/ECAPs (11 comments)	Access to Opportunity (117 comments)	Disproportionate Housing Needs (80 comments)	Publicly Supported Housing (53 comments)	Disabilities (142 comments)	Fair Housing Enforcement (12 comments)
Community Opposition/ Source-of-Income Discrimination (36%)	Location and type of affordable housing (36%)	Location/type affordable housing; high housing costs (26%)	Lack of access to opportunity due to high housing costs, loss of affordable housing, availability of affordable units in range of sizes, displacement due to economic pressure (56%)	Admissions and occupancy policies, preferences (30%)	Lack of affordable integrated housing needing supportive services/lack of affordable accessible housing; lack of affordable in-home or community- based supportive services (50%)	Local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.) (75%)
Lack of Social/Personal Supports (27%)	Source-of- income discrimination (27%)	Lack of public/private investments, crime prevention (24%)	Lack of public/private investment in neighborhoods and properties (24%)	Quality of affordable housing information programs (21%)	State and local laws/lack of access to publicly supported housing for persons with disabilities (13%)	
Income (23%)	Lack of regional cooperation	Availability, type, frequency, reliability of public transportation (22%)	Lack of housing support for victims of domestic violence	Lack of access to opportunity due to high housing costs, loss of affordable housing (15%)	Access to transportation for persons with disabilities (13%)	
	Private investments	Location of employers		Community opposition/source- of-income discrimination (15%)	Inaccessible public or private infrastructure (13%)	
		Location of proficient schools/school assignment policies		Lack of meaningful language access	Access to proficient schools for persons with disabilities	
		Land use/zoning laws		Land use and/zoning laws		

Figure 225: Approximate numbers of comments received from public meetings, focus groups and interviews by issue area and contributing factor grouping, Plano

Figure 226 displays a summary of the highest priority contributing factors to fair housing issues, based on community input. This chart was presented to the community for additional feedback

during a second round of public meetings and stakeholder engagement. At least one highly ranked contributing factor was selected in each fair housing issue area. Highest priority issues are listed first.

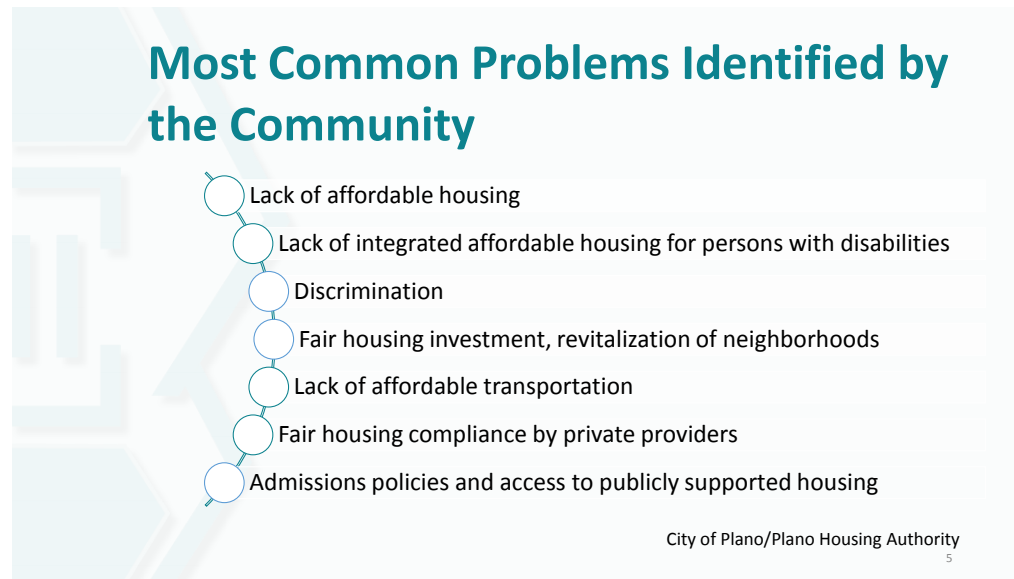


Figure 226: Most commonly identified fair housing issues from public engagement activities, Plano

One additional issue was identified, based on public input and subject matter expert consultation that bridges several of the elements of access to opportunity. Figure 227 portrays the geographical mismatch of jobs at high and low wage levels and the housing that would be affordable to those job holders. Many support and service job holders and middle-income professionals work in higher income communities where there is no housing affordable to them, requiring them to travel significant distances to employment. The lack of affordable, reliable and responsive transportation options, connecting housing and employment, significantly increases their housing cost and affects their quality of life.



Figure 227: Over-arching issue: the location of affordable housing in relation to the location of employers and the availability of affordable transportation to connect housing and employment

Goals were developed to address each top priority issue. Participants in a round two public meeting, held in February 2018, were asked to rate the importance of each goal. Figure 228 displays the votes of the attendees at the meeting, listed in order of importance to the attendees. Access to affordable housing in high-opportunity areas received strong support as a highly important goal. All goals were viewed as important and none were rated low or of no importance.

Goals	Rating of Importance			
	High	Medium	Low	Not important
Increase access to affordable housing in high-opportunity areas	10	0	0	0
Increase supply of affordable housing units	7	0	0	0
Increase supply of accessible, affordable housing for persons with disabilities	6	1	0	0
Increase access to affordable transportation	6	0	0	0
Invest in neighborhoods	5	3	0	0
Increase access to information	5	2	0	0
Improve quality and management of publicly supported housing	2	3	0	0

Figure 228: Number of votes per rating of importance for Plano draft goals by public meeting participants

Draft goals and strategies were also distributed to the NTRHA Technical Advisory committee. Advisors made the following comments in a meeting held in June 2018:

- Goals and strategies must be accompanied by more detailed metrics, milestones and identification of the parties to be involved in implementation.
- Goal implementation should incorporate community partners.
- AFH goals should strive to set policy that makes affordable housing development on vacant land cheaper and easier to do.
- Need a strategy to deal with cities in the region that don't have the political will to increase affordable housing.
- Smaller housing authorities should consider collaboration or consolidation to address problems with lack of capacity. Use regional approaches to address lack of capacity.
- Make goals around access to fair housing information consistent across all jurisdictions in the NTRHA. This should include tenant's rights education (e.g. rights to repairs). Research and use best practices for information dissemination, including working through nonprofit partners (e.g. tenants' rights organizations), making information mobile and taking it to the apartments where the problems are greatest.
- Develop goals and strategies that promote equitable development.
- Mount an outreach program to voucher holders (through nonprofit partners) to make them aware that they can use the SAFMR program to move to better areas. Watch for new mobility funding possible from Congress to fund programs.
- Include in the AFH report a discussion of the capacity required by cities and housing authorities to continuously track progress toward metrics. Be detailed about what is needed.

2

For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement

The City of Plano and the Plano Housing Authority have collaborated to develop a set of goals and strategies that jointly will address the top priorities among contributing factors to fair housing issues. Seven goals are identified in the table below with candidate strategies. Goals and strategies were presented to the community in a public meeting and received positive responses.

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible</u>
Increase supply of affordable housing units	<ul style="list-style-type: none"> • Location and type of affordable housing • Lack of access to opportunity due to high housing costs • Loss of affordable housing • Community opposition 	<ul style="list-style-type: none"> • R/ECAPs • Access to opportunity • Disproportionate housing needs • Publicly supported housing 	<ul style="list-style-type: none"> • Complete comprehensive housing assessment to determine requirements for affordable housing at all income levels (6 months to one year) • Develop set of policies and incentives to encourage affordable development in all communities. (6 months to one year) • Produce housing report to the community (annually) • Track progress toward affordable housing goals and the impact of housing on community infrastructure and resources. (Reported annually in CAPER. The CAPER for a given program year is made available on the City's website in December following the end of each program year, e.g. the PY 2017 CAPER will be available December 2018.) • Develop working group of providers of affordable housing to identify and resolve barriers to development and streamline processes and develop proposals for incentives for developers. (Two to five years) • Collaborate with owners and developers of small rental properties to develop strategies for compatible affordable housing in single-family zones and develop strategies for public-private partnership to assist with rehab and capital costs. (Two to five years) • Collaborate with lenders to create strategies for pre-development financing of affordable housing preservation and development. (Two to five years) • Develop strategies to incorporate affordable housing into mixed-use development, including redevelopment of retail centers. (One to two years) • Develop new affordable housing units through new construction, rehabilitation of old housing stock and public-private collaborations (Number of units to be determined as a part of the City's next Con Plan) • Seek funding to expand existing home repair programs (Ongoing, next five years) • Evaluate existing homebuyer assistance program as it relates to the current market and assistance provided. (Initial evaluation – one year, will be reevaluated on an annual basis) 	City of Plano
<p>Discussion: Increasing the supply of affordable housing will address the needs of protected classes whose housing choice is limited by low income and high market prices. Supply can be increased by using public assistance to give voucher holders access to homeownership. It may be possible to craft incentive programs for landlords who might be attracted to participate in voucher programs if they can be assisted with major property maintenance. Improved property conditions can decrease community opposition. Addressing community opposition is critical to successful development in higher opportunity areas. Mixed income housing directly addresses segregation that coincides with low income communities. Transportation is critical to making assisted housing in higher opportunity areas successful and to address disproportionate housing needs.</p>				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible</u>
Increase supply of accessible, affordable housing for persons with disabilities	<ul style="list-style-type: none"> Lack of affordable integrated housing for persons needing supportive services; Lack of affordable, accessible housing for persons with disabilities; Lack of affordable in-home or community based supportive services 	Disabilities and access	Seek funding and incentives to support the implementation of universal design and accessibility modifications in homes for sale and for rent, single and multifamily. (Ongoing, next five years)	City of Plano
Discussion: Cities can increase the availability of accessible community-based, integrated housing by promoting universal design (all housing is accessible for all people to visit and live in throughout their lives) in new construction. Cities can also expedite the transformation and expansion of community-based housing for persons with disabilities by finding resources to support accessibility modifications for existing housing.				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible</u>
Increase access to affordable transportation for low-income households and persons with disabilities	<ul style="list-style-type: none"> Availability, type, frequency, reliability of public transportation Access to transportation for persons with disabilities State or local laws, policies or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings 	<ul style="list-style-type: none"> Access to opportunity Disabilities and access 	<ul style="list-style-type: none"> Work with DART to expand first- and last-mile access to public transportation for lower income residents (Three to five years) Conduct impact analysis of locations of jobs by wage level in relation to locations of affordable housing, especially for new and relocating employers (Two to four years) Continue to develop Transportation Management Associations that pool employer resources to increase access to affordable transportation to employment. (Ongoing, next five years) Expand subsidized transit fare programs to include both persons with disabilities and lower income households. (Three to five years) Assess locations of senior housing and housing for persons with disabilities in relation to retail, recreation and service centers. (One to three years) <ul style="list-style-type: none"> Recommend changes to DART routes. (Three to five years) Expand and improve efficiency of Paratransit programs. (Three to five years) 	City of Plano
Discussion: Affordable, accessible and reliable public transit contributes to access to opportunity by enabling residents to access good jobs and meet the needs of their families for transportation.				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible</u>
Make investments in targeted neighborhoods to increase opportunity	<ul style="list-style-type: none"> Lack of public investments in specific neighborhoods, including services or amenities; Inaccessible public or private infrastructure 	<ul style="list-style-type: none"> Access to opportunity R/ECAPs Disabilities and access 	<ul style="list-style-type: none"> Continue and expand resources to support economic development in lower income neighborhoods to redevelop retail centers and attract needed businesses. (Three to five years) Enhance crime prevention in lower income neighborhoods, including improved lighting. (Two years) Expand Love Where You Live neighborhood revitalization program and monitor program investment and impact. (Ongoing, next five years) Complete comprehensive ADA assessment and increase funding to expedite accessibility, including construction and repair of sidewalks, especially adjacent to housing for persons with disabilities, retail and service centers and public transportation stops. (Three to five years) 	City of Plano
Discussion: Affordable, accessible and reliable public transit contributes to access to opportunity by enabling residents to access good jobs and meet the needs of their families for transportation.				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible</u>
Increase access to information and resources on fair and affordable housing	<ul style="list-style-type: none"> Local education and fair housing enforcement by private housing provider (real estate agents, builders, etc.) Quality of affordable housing information programs 	<ul style="list-style-type: none"> Fair housing enforcement Publicly supported housing 	<ul style="list-style-type: none"> Provide education and information around tenants' rights. (Annually in April, Fair Housing Symposium) Assess and benchmark affordable housing information programs, including programs for purchase and rental, repair, accessibility modifications and new construction. Create affordable housing resource guide. (Six months) Work with advocacy groups and service providers to develop information programs. (One year) 	City of Plano Partners to engage: Private real estate agencies and builders, Tenants' Rights associations, PHA
Discussion: Participants in public engagement say that people don't know about the resources that are available help them with housing needs and problems. Partnering with nonprofit agencies can expand resources available to conduct education and outreach. Engaging builders, brokers and real estate agents in education and outreach will improve industry performance and make consumers better able to protect their rights. Assertive outreach by the City and PHA will ensure that people are aware of available housing resources and increase access.				

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible</u>
Maintain and improve the quality and management of publicly supported housing	Community opposition	<ul style="list-style-type: none"> • R/ECAPs • Segregation • Access to opportunity • Publicly supported housing 	Create shared information program between city and PHA to facilitate resolution of property management problems, including code compliance complaints and crime data. (One to two years)	City of Plano Plano Housing Authority
Discussion: Local research demonstrates that the condition of publicly assisted and low-income housing is a significant driver of community attitudes. Well-managed and well-maintained properties improve public opinion and may reduce some community opposition. Cities and housing authorities can work together to ensure that problems in publicly assisted housing are proactively identified and addressed.				



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APPENDICES

Appendices

Methodology for Segregation Analysis

To assess levels and patterns of segregation, HUD has provided program participants with a 'Dissimilarity Index' which measures the relative degree of segregation between two groups. The higher the value, the higher the degree of dissimilarity. To supplement the HUD dissimilarity index and assess spatial patterns of segregation, our team of researchers has developed the following methodological protocol.

Using the dissimilarity value as a starting point, the intent is to measure to what extent the racial composition of a given census tract significantly differs from the overall jurisdictional racial composition. In other words, the objective is to assess whether there is a statistically significant difference between the racial makeup of a census tract (conventional equivalent of a neighborhood) and the overall city. To do so, we performed a series of "t-test" for Non-white groups/white, black/white, Hispanic/white and Asian or Pacific Islander/white – in accordance with the available HUD dissimilarity indices. The values obtained from this type analysis allow determining whether a statistical difference exist.

Below is a brief overview of the analytical steps taken to assess spatial patterns of segregation.

A. T-TEST

In order to compare the jurisdictional racial/ethnic composition with that in each census tract, we decided to use t-test.

Test statistic:

$$Z = \frac{\hat{p} - p_0}{\sqrt{\frac{p_0(1-p_0)}{n}}}$$

\hat{p} = percentage of selected racial/ethnic group in census tract (i.e. 'Non-white')

p_0 = percentage of selected racial/ ethnic group in jurisdiction (i.e. 'Non-white')

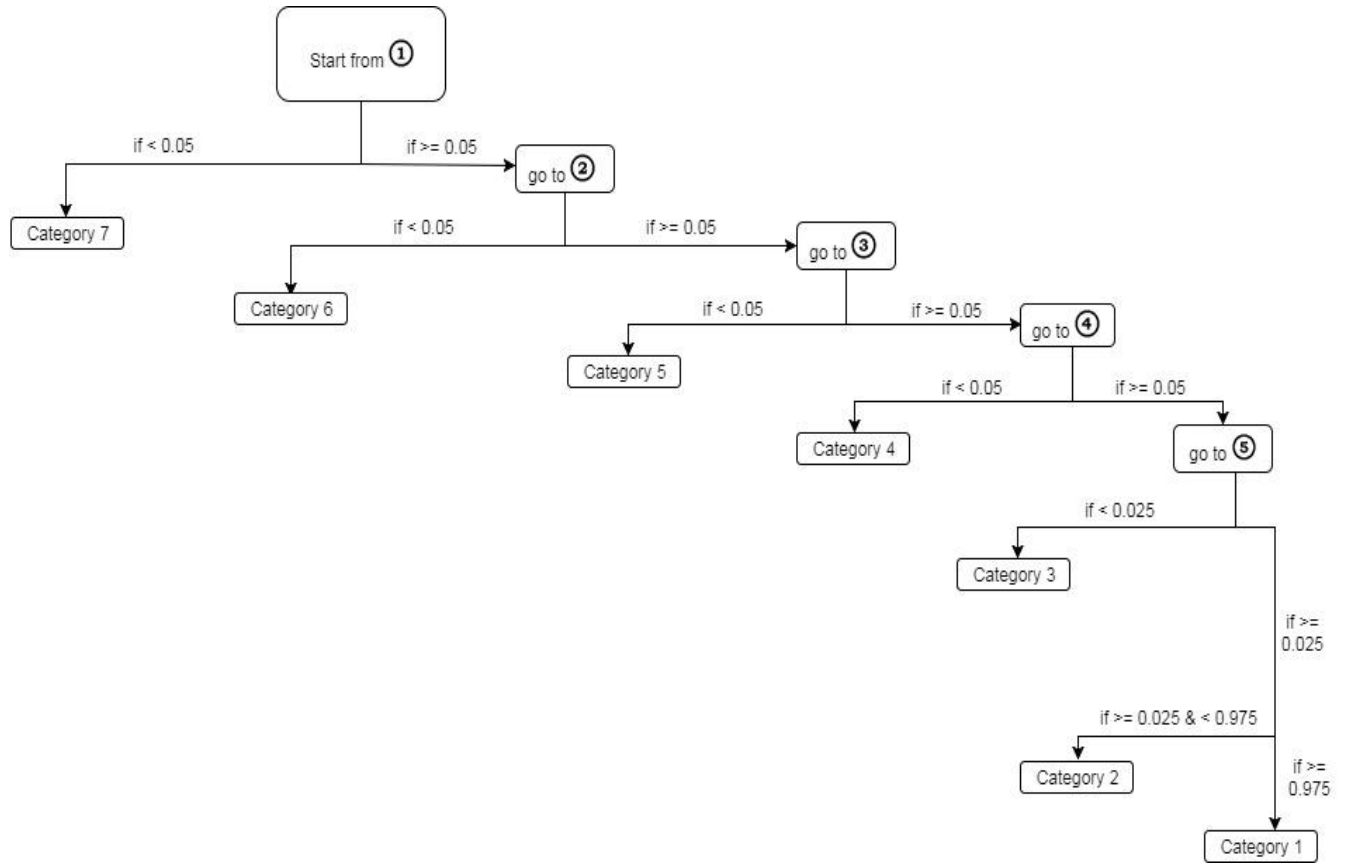
n = total population in one census tract

For each census tract, we obtain a Z value for which there is a corresponding 'p-value' that allows us to determine whether we accept or reject the hypothesis that the racial composition of the census tract is statistically different from the city. Put simply, if the p-value is smaller than 0.05 (one tail) or 0.025 (two-tail test), then there is a statistical difference between the census tract and the city (at a 95% of confidence).

B. METHODOLOGICAL APPROACH

In order to assess the magnitude of the difference between the census tract and the city, we sequentially performed multiple t-tests for several percentage difference brackets; namely: 10,20,30,40 and more than 40% difference. Similarly, for each z-value and associated p-value, we determined whether there is a significant difference for the set range (either >40% difference, <40%, <30%, <20% and <10%). Within a 1% difference range, the census tract is qualified as "integrated" with respect to overall jurisdictional composition.

The flow chart below shows how we decide which category a census tract belongs to:



Category	Meaning
1	Greater white population share
2	Integration
3	Up to 10% greater than jurisdiction pct
4	Up to 20% greater than jurisdiction pct
5	Up to 30% greater than jurisdiction pct
6	Up to 40% greater than jurisdiction pct
7	More than 40% greater than jurisdiction pct

①

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geoid	>40% z-score	p-value	>30% z-score	p-value	>20% z-score	p-value	>10% z-score	p-value	z-score	p-value	Category
48113014132	-43.9300	1	-34.15	1	-24.37	1	-14.6	1	-4.805	1	1
48113018505	-18.8854	1	-7.02	1	-4.839	0	16.7	0	-28.56	0	5
48113013625	-21.3627	1	-10.60	1	-0.158	0.437	10.9	0	21.68	0	4
48113010704	-16.3246	1	-0.923	0.822	14.48	0	29.9	0	45.28	0	5
48113010801	-24.3470	1	-4.024	1	16.30	0	36.6	0	56.94	0	5

Notices

Technical Advisory Board

Technical Advisory Board

Habitat for Humanity

League of United Latin American Citizens (LULAC)

Texas Workforce Commission (TWC),
Civil Rights Division (*ex-officio member*)

Legal Aid of Northwest Texas (LANWT)

Federal Reserve Bank of Dallas

Metro Dallas Homeless Alliance (MDHA)

The Real Estate Council (TREC)

Coalition of Texans with Disabilities (CTD)

Rehabilitation, Education and
Advocacy for Citizens with Handicaps (REACH)

Tarrant County Homeless Coalition (TCHC)

Texas organizing Project (TOP)

Dallas Women's Foundation

National Association for the
Advancement of Colored People (NAACP)

North Central Texas Aging and
Disability Resource Center (NCTADRC)

University of Texas at Arlington

Department of Civil Engineering

UNIVERSITY OF TEXAS  ARLINGTON

North Texas Regional Housing Assessment

Dear Board Members,

Thank you for taking the time to participate in the Doodle Poll. Our first kick-off meeting is set for June the 28th, 1:30 pm at the University of Texas at Arlington. The meeting will take place in the Rady Room (601 NH) located on the 6th floor of Nedderman Hall. Our team of researchers will discuss and gather your input on early findings and strategies to identify and tackle fair housing challenges in the Dallas Fort Worth region.

Please find the parking directions below:



Building: Nedderman Hall
Sixth Floor, Randy Room (601 NH)
416 S Yates St.
Arlington, TX 76010

Parking: Lot 36 across UTA Boulevard
Campus map is available:

www.uta.edu/maps/

I look forward to seeing you all at our first meeting. If you have additional questions, please contact me at mattingly@uta.edu or Myriam Igoufe (myriam.igoufe@uta.edu) at your convenience.

Sincerely,



Dr. Stephen Mattingly, Principal Investigator
Associate Professor
Department of Civil Engineering
817-272-6767
www.northtexasrha.com



A.

STAR LOCAL MEDIA

Plano Star Courier, Celina Record, Internet

AFFIDAVIT OF LEGAL NOTICE

I, Nick Souders, Inside Sales Manager of the Plano Star Courier, Celina Record, Internet a newspaper printed in the English language in Collin County, State of Texas, do hereby certify that this notice was Published in the Plano Star Courier, Celina Record, Internet on the following dates, to-wit

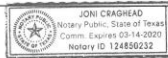
Plano Star Courier	06/11/17	06/11/17	1
Celina Record	06/16/17	06/16/17	1
Internet	06/11/17	06/11/17	1

ASSESSMENT OF FAIR HOUSING	\$132.30
(Description)	(Cost)

Inside Sales Manager of the Plano Star Courier, Celina Record, Internet

Subscribed and sworn on this

16 day of June, 2017



Joni Craghead

Notary Public, State of Texas

Assessment of Fair Housing

Publication Date: June 11, 2017

The City of Plano and Plano Housing Authority invite you to attend a Public Meeting on July 27, 2017 at 7 p.m. at the Plano Housing Authority located at 1740 G Avenue, Plano, TX 75074. The main entrance faces G Avenue at the Southeast corner of the building. This meeting is intended to inform residents about the Assessment of Fair Housing (AFH) and provide an opportunity for all to participate in the AFH planning process.

The Fair Housing Act of 1968 requires all jurisdictions receiving federal funding to further fair housing. This funding can include but is not limited to sources such as The U.S. Department of Transportation - Federal Highway Administration, The U.S. Department of Energy, and The U.S. Department of Housing and Urban Development (HUD).

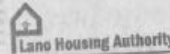
HUD ensures that program participants receiving its funding comply with the provisions of the Fair Housing Act by requiring them to complete an Assessment of Fair Housing (AFH). The purpose of the AFH is to assess whether individuals and families have the information, opportunity and options to live where they choose without unlawful discrimination related to race, color, religion, sex, familial status, national origin or disability. The AFH also assesses whether housing options are realistically available to people of varying backgrounds in integrated areas and areas with access to opportunity. The AFH is undertaken pursuant to 24 CFR Part 5 and includes the analysis of fair housing data, an assessment of housing issues and contributing factors, and identification of fair housing priorities and goals specific to Plano.

PUBLIC COMMENTS

Residents, businesses, nonprofit organizations and faith communities in Plano are encouraged to attend the meeting and provide input. Anyone who wishes to make their views known but is unable to attend may submit a written comment to Shanette Brown at the City of Plano Neighborhood Services Department, 7501-A Independence Pkwy, Plano, TX 75025 or by email to shanetteb@plano.gov.

ACCESSIBILITY STATEMENT

The Plano Housing Authority Building is wheelchair accessible. A sloped curb entry is available at the front and side entrance into the building with specially marked parking spaces nearby. Accessible parking is also available on the north side of the building. Requests for sign interpreters or special services must be received forty-eight (48) hours prior to the meeting time by calling the Neighborhood Services Department at (972) 208-8150.



Public Meeting

Assessment of Fair Housing

The City of Plano and the Plano Housing Authority invite you to attend a public meeting regarding the Assessment of Fair Housing (AFH). We need your input regarding fair housing issues and barriers that you see to obtaining decent, affordable housing in your community. Comments and feedback will be included in the AFH reports created by the City and the Housing Authority.

When: Thursday, July 27th
at 7:00 pm

Where: Plano Housing
Authority, 1740 G Avenue,
Plano, TX 75074

Please also complete the online survey available
here: <http://northtexasrha.com/survey/>

Accessibility Statement: The Plano Housing Authority Building is wheelchair accessible. A sloped curb entry is available at the front and side entrance into the building and accessible parking is available. Requests for sign interpreters or special services must be received forty-eight (48) hours prior to the meeting time by calling the Neighborhood Services Department at (972) 208-8150.

www.PlanoNeighborhoods.org


Junta Pública

Evaluación de Vivienda Justa

La Ciudad de Plano y la Autoridad de Vivienda de Plano le invita a asistir a una reunión pública con respecto a la evaluación de Vivienda Justa (AFH). Esta es la oportunidad para expresar los problemas y dificultades que usted ve para obtener una vivienda decente en su comunidad. Sus comentarios se incluirán en los informes AFH creados por la Ciudad y la Autoridad de Vivienda.

Jueves, 27 de Julio, 7:00 pm
Plano Housing Authority
(Autoridad de Vivienda de Plano)
1740 G Avenue, Plano, TX 75074

Por favor, complete también la encuesta en línea disponible
aquí: <http://northtexasrha.com/survey/>

Declaración de accesibilidad: El edificio de la Autoridad de Vivienda de Plano es accesible en silla de ruedas. La entrada de acera inclinada está disponible en frente y en el lado del edificio; Estacionamiento accesible está disponible. Solicitudes de intérpretes de señales o de servicios especiales deben recibirse cuarenta y ocho horas (48) antes de la reunión llamando al Departamento de Servicios de Vecindad al (972) 208-8150.

www.PlanoNeighborhoods.org


Neighborhood Services Home
Community Services Division
Property Standards Division
BEST Neighborhoods Division
Fair Housing



TAKE THE FAIR HOUSING SURVEY

You are here: [Home](#) > [Your Government](#) > [Departments](#) > [Departments G - Z](#) > [Neighborhood Services](#) > [Fair Housing](#)

Fair Housing

It's the Law

Discrimination, based on race, color, religion, gender, disability, familial status or national origin, in connection with the sale or rental of most housing and any vacant land offered for residential construction or use, is illegal under Title VII of the Civil Rights Act of 1968.

The City of Plano, through Ordinance No. 92-3-13, also prohibits housing discrimination. Furthermore, it is illegal to threaten, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right. The City of Plano's 2015-2019 Analysis of Impediments to Fair Housing reviews impediments to fair housing choice in the public and private sectors within the city. For further information regarding your rights with regard to housing discrimination, you may go to the HUD's website on [Fair Housing](#).

North Texas Regional Assessment of Fair Housing

On January 9, 2017, the City Council approved a [Resolution No. 2017-1-3\(R\)](#) allowing the City of Plano to collaborate with seven north Texas cities and 15 north Texas housing authorities on a Regional Assessment of Fair Housing. The collaboration enables participants to address fair housing issues that cross jurisdictional lines. The focus is on a local approach that will work best for communities within our region.

Consultants from the University of Texas at Arlington (UTA) will conduct [public meetings](#) and focus groups, on behalf of the City of Plano and the Plano Housing Authority, to gain feedback from residents on fair housing issues. UTA is developing a website to provide information on the regional process that can be viewed [here](#). The website will be updated with regional fair housing data over the upcoming months.

You can provide input on fair housing by attending the public meeting (see information on the right side of this page or on our department calendar) and by completing the short online survey available here: <http://northtexasrha.com/survey>

How to File a Housing Complaint

If you have been trying to buy or rent a home or apartment and you believe your rights have been violated, you can:

- [file a complaint online](#) with the U.S. Department of Housing and Urban

Public Meeting Assessment of Fair Housing

This is YOUR opportunity to provide input regarding fair housing issues and barriers you see to obtaining decent, affordable housing in your community.

When: Thursday, July 27th at 7:00 pm. Where: Plano Housing Authority 1740 G Ave., Plano, TX 75074

- [PUBLIC NOTICE 06-11-17 AFH Public Meeting](#)



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NOTICES

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NOTICES

NOTICES

City of Plano in Conjunction with the Plano Housing Authority Notice of Public Meeting Assessment of Fair Housing

Publication Date: December 17, 2017

The City of Plano and Plano Housing Authority invite you to attend a public meeting in which draft goals and strategies related to fair housing issues will be presented, and the public will be invited to provide feedback. This information is being collected as part of the development of the Assessment of Fair Housing (AFH). The meeting will be held on Monday, February 5, 2018 at 7:00 PM at Plano Housing Authority located at 1740 G Avenue, Plano, TX 75074. The main entrance faces G Avenue at the Southeast corner of the building.

The AFH is undertaken pursuant to 24 CFR Part 5 and includes the analysis of fair housing data, an assessment of housing issues and contributing factors, and identification of fair housing priorities and goals specific to Plano. The purpose of the AFH is to assess whether individuals and families have the information, opportunity and options to live where they choose without unlawful discrimination related to race, color, religion, sex, familial status, national origin or disability. The AFH also assesses whether housing options are realistically available to people of varying backgrounds in integrated areas and areas with access to opportunity.

PUBLIC COMMENTS

All residents, property owners, persons with disabilities, immigrants, seniors, low-income persons, youth, homeless persons, and other stakeholders in Plano are invited to attend this public meeting. Anyone who wishes to make their views known but is unable to attend the meeting may submit a written comment to Shanette Eaden at the City of Plano Neighborhood Services Department, 7501-A Independence Pkwy, Plano, TX 75025 or by email to shanettee@plano.gov.

ACCESSIBILITY STATEMENT

The Plano Housing Authority Building is wheelchair accessible. A sloped curb entry is available at the front and side entrance into the building. Requests for interpreters, ADA accommodations or special services must be received forty-eight (48) hours prior to the meeting time by calling the Neighborhood Services Department at (972) 208-8150.

12/17/17 S/C (SLM)

NOTICES

NOTICES

NOTICES

NOTICES

LEGAL NOTICE

JORDAN TOWING INC., WILL CONDUCT AN ONLINE AUCTION OF UNREDEEMED VEHICLES AT AN UNKNOWN DATE. THE AUCTION WILL BE HELD AT JORDAN TOWING INC., LOCATED AT 601 DIGITAL DR., PLANO, TEXAS 75075. VIEWING WILL BE AVAILABLE AT www.lonestarauctioneers.com

INVITATION TO PARTICIPATE IN

Focus Groups

WOULD YOU LIKE TO SHARE YOUR THOUGHTS
AND EXPERIENCES REGARDING
FAIR HOUSING IN YOUR COMMUNITY?

邀请您参加

焦点小组

您愿意分享关于您的社区的公平住房的想法和体验吗?



- > ADA Accessible
- > Translation will be provided
- > Snacks and refreshments will be served



- > ADA 无障碍通行
- > 提供翻译服务
- > 备有点心茶点

The group will be held on Thursday, November 9th at 2:00 PM at the Pioneer Place Campus. Please RSVP at the office.

小组会议将于 11 月 9 日星期四下午 2 时在先锋广场校园 (Pioneer Place Campus) 举行。请到办公室预约。



ASSESSMENT OF FAIR HOUSING



公平住房评估

INVITATION TO PARTICIPATE IN

Focus Groups

WOULD YOU LIKE TO SHARE YOUR THOUGHTS
AND EXPERIENCES REGARDING
FAIR HOUSING IN YOUR COMMUNITY?

INVITACIÓN A PARTICIPAR EN EL

Grupo Focal

¿QUIERES COMPARTIR TUS PENSAMIENTOS Y
EXPERIENCIAS SOBRE EQUITAD DE VIVIENDA EN SU
COMUNIDAD?



- > Must be 18 or older
- > ADA Accessible
- > Language accommodations available upon request
- > Groups will be held August 17-23rd in Plano. You will receive exact dates, times and locations when you register.



- > Debe ser mayor de 18 años
- > Accesible para las personas con algún tipo de discapacidad
- > Ayuda de idioma disponible a su petición
- > Los grupos serán los días 21-23 de Agosto. Usted recibirá las fechas y horas exactas cuando se registre

Interested? Contact 817-272-6767 or afh.uta@gmail.com to register

¿Interesado? Favor de comunicarse al 817-272-6767 o afh.uta@gmail.com

Please also complete the online survey available here: northtexasrha.com/survey/

Por favor, complete también la encuesta en línea disponible aquí: northtexasrha.com/survey/



ASSESSMENT OF FAIR HOUSING



ASSESSMENT OF FAIR HOUSING

热诚邀请大家参加

专题讨论

请对你们社区公平住房问题提出你们的看法，分享你们的经历。

你们的意见很重要！



- 参加者必须年满18岁
- 提供残疾人设施
- 经事先联系可提供翻译服务

有意者请电话联系: **817-272-6767**
或通过电子邮件: **afh.uta@gmail.com**

请到这个网站填写问卷调查: <http://northtexasrha.com/survey/>

组织单位:

德州大学阿灵顿分校



UNIVERSITY OF TEXAS ARLINGTON



ASSESSMENT OF FAIR HOUSING

INVITATION TO PARTICIPATE IN

Focus Groups

WOULD YOU LIKE TO SHARE YOUR THOUGHTS
AND EXPERIENCES REGARDING
FAIR HOUSING IN YOUR COMMUNITY?



- > Must be 18 or older
- > ADA Accessible
- > Language accommodations available upon request
- > Monday, October 23, 1:00 - 2:30 PM
- > Harrington Library: 1501 18th St, Plano, TX 75074
- > Light refreshments and snacks will be served
- > We will have a drawing for 4 prizes!

Contact 214-658-1330 or map@inclusivecommunities.net to register



UNIVERSITY OF TEXAS ARLINGTON



ASSESSMENT OF FAIR HOUSING

protects yourself, but also fair- older influenza.

CITY OF PLANO
NOTICE OF PUBLIC HEARING AND COMMENT PERIOD
ASSESSMENT OF FAIR HOUSING
Publication Date: December 9, 2018

The City of Plano has prepared a draft Assessment of Fair Housing (AFH). The AFH is undertaken pursuant to 24 CFR Part 5 and includes the analysis of fair housing data, an assessment of housing issues and contributing factors, and identification of fair housing priorities and goals specific to Plano. The purpose of the AFH is to assess whether individuals and families have the information, opportunity and options to live where they choose without unlawful discrimination related to race, color, religion, sex, familial status, national origin or disability. The AFH also assesses whether housing options are realistically available to people of varying backgrounds in integrated areas and areas with access to opportunity. The City of Plano AFH has been prepared following extensive review of local data and public input, including two public meetings and one public hearing, which took place between July 2017 and February 2018.

PUBLIC COMMENTS

A public comment period will be open from December 10, 2018 to January 14, 2019. The public may review the AFH in-person at the Neighborhood Services Department, 7501-A Independence Parkway, Plano, TX 75025. City department office hours are 8:00 a.m. to 5:00 p.m., Monday through Friday. City offices will be closed December 24-25, and January 1, in observance of winter holidays. The AFH may also be reviewed online at www.plano.gov/660/Housing-Urban-Development-HUD-Grants.

Comments regarding the AFH should be directed to Shanette Eaden, Housing and Community Services Manager, 7501-A Independence Parkway, Plano, TX 75025, Phone: (972) 208-8150, Fax: (972) 208-8158, Email: shanettee@plano.gov. Comments received by 5:00 P.M. on Monday, January 14, 2019, will be provided to City Council. Comments may also be made at the public hearing (see below).

PUBLIC HEARING

The AFH will be reviewed by City Council, and the public may comment at a public hearing on Monday, January 14, 2019, to be held at 7:00 p.m. in the Council Chambers of the Plano Municipal Center, 1520 K Ave, Plano, TX 75074.

ACCESSIBILITY STATEMENT

The Plano Municipal Building is wheelchair accessible. A sloped curb entry is available at the main entrance facing Municipal Avenue, with specially marked parking spaces nearby. Access and special parking are also available on the north side of the building. Requests for sign interpreters or special services must be received forty-eight (48) hours prior to the meeting time by calling the Neighborhood Services Department at (972) 208-8150.

STAR LOCAL MEDIA

Plano Star Courier, Celina Record

AFFIDAVIT OF LEGAL NOTICE

I, Nick Souders, Inside Sales Manager of the Plano Star Courier, Celina Record a newspaper printed in the English language in Collin County, State of Texas, do hereby certify that this notice was Published in the Plano Star Courier, Celina Record on the following dates, to-wit:

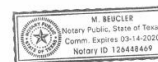
Publication	Date	Page	Count
Plano Star Courier	12/09/18	12/09/18	1
Celina Record	12/07/18	12/07/18	1

ASSESSMENT OF FAIR HOUSING	\$132.30
(Description)	(Cost)

Inside Sales Manager of the Plano Star Courier, Celina Record

Subscribed and sworn to this

10th day of December, 2018.

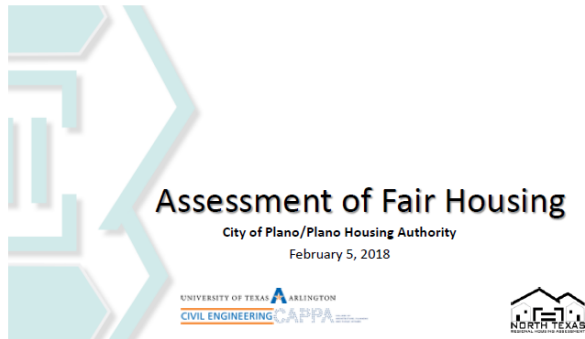


M. Beucher

Notary Public, State of Texas

Public Meeting Materials

Second Round, 2-5-18

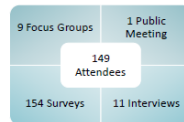


AGENDA

- Assessment of Fair Housing (AFH) Progress
- Data Analysis and Public Input
 - Key findings
 - Top priorities
- Suggested Goals
- Rate Draft Goals – Posters
- Regroup for Final Comments
- Moving Forward

Assessment of Fair Housing (AFH) Progress

- Plano Public Engagement (2017)
- Analysis of public input and fair housing data
- Surveys and discussions continue



City of Plano/Plano Housing Authority

Data Analysis and Feedback

Key Findings

- Segregation
- Concentration of Poverty
- Location of Publicly Supported Housing
- Housing Cost Burden

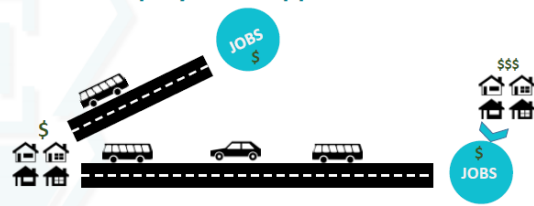
City of Plano/Plano Housing Authority

Most Common Problems Identified by the Community

- Lack of affordable housing
- Lack of integrated affordable housing for persons with disabilities
- Discrimination
- Fair housing investment, revitalization of neighborhoods
- Lack of affordable transportation
- Fair housing compliance by private providers
- Admissions policies and access to publicly supported housing

City of Plano/Plano Housing Authority

Over-arching issue: Location of Affordable Housing in relation to Employment Opportunities



Draft Goals

- Increase access to affordable housing in high opportunity areas
- Increase supply of affordable housing units
- Increase supply of accessible, affordable housing for persons with disabilities
- Increase access to affordable transportation options for low income households and persons with disabilities
- Make investments in targeted neighborhoods to increase opportunity
- Increase access to information and resources on fair and affordable housing
- Maintain and improve the quality and management of publicly supported housing

City of Plano/Plano Housing Authority

7

Rate Draft Goals

- Visit the posters around the room
 - Review data
 - Rate goal importance
 - Example strategies provided for each goal
 - Rate each goal by placing sticker in the appropriate box
 - High, Medium, Low importance or Not important
 - Identify locations for transit, infrastructure, affordable housing improvements
- UTA students, City and PHA staff are available to answer questions
- Use sticky notes to leave comments
- Regroup for final group discussion

8

Moving forward

- Complete public meetings for input on goals
- Continue gathering survey data
- Summarize findings and feedback
- Report to public comments and analysis

9

Your voice matters! Please contact us at:

northtexasrha.com
817-272-6767
AFH.UTA@GMAIL.COM

thank you!

Dr. Stephen Mattingly, Principal Investigator
Dr. Ivonne Audrac, Co-Principal Investigator
Myriam Igouffe, Co-Principal Investigator, Project Manager
Dr. Nick Fang, Co-Principal Investigator
Dr. Rod Hissong, Co-Principal Investigator



Rate Goal



Goal A: Increase access to affordable housing in high opportunity areas

Any comments? Please use notes provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Provide mobility counseling and support for improved access/utilization
- Support regional fair market rent analysis to make vouchers competitive
- Recruit and attract landlords in high opportunity areas with incentives
- Analyze impact of criminal backgrounds and evictions on housing choice

Rate Goals



Goal B: Increase supply of affordable housing units

Any comments? Please use notes provided and stick on the accompanying comment board.

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Complete comprehensive housing needs assessment
- Create additional incentives to develop affordable housing
- Develop new affordable housing units
- Engage lenders to increase affordable housing finance
- Address rising property values and taxes
- Expand home repair programs to include multi-family, rental
- Promote accessory dwellings and affordable housing in mixed use development

Rate Goals

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

Any comments? Please use paper provided and stick on the accompanying comment board

<u>HIGH Importance</u>	<u>MEDIUM Importance</u>	<u>LOW Importance</u>	<u>Not Important</u>

Strategy Examples

- Use special voucher programs to increase accessible, affordable housing
- Promote housing design accessible to all people
- Develop additional funding resources for housing accessibility modifications

Rate Goals

Goal D: Increase access to affordable transportation

Any comments? Please use notes provided and stick on the accompanying comment board.

<u>HIGH Importance</u>	<u>MEDIUM Importance</u>	<u>LOW Importance</u>	<u>Not Important</u>

Strategy Examples

- Conduct housing/transportation/jobs impact analyses
- Support transportation coordination through business associations
- Expand transit solutions for housing locations with seniors and persons with disabilities
- Address transportation needs of people in publicly supported housing
- Expand subsidized transit programs to low income riders
- Increase access to public transit ('first mile' and 'last mile')

Rate Goals

Goal E: Invest in neighborhoods

Any comments? Please use notes provided and stick on the accompanying comment board

HIGH Importance	MEDIUM Importance	LOW Importance	Not Important

Strategy Examples

- Incentivize neighborhood retail development
- Enhance crime prevention including improved lighting
- Expand 'Love Where You Live' program
- Complete comprehensive public infrastructure accessibility assessment and increase resources for improvements

Rate Goals

Goal F: Increase access to information

Any comments? Please use paper provided and stick on the accompanying comment board

<u>HIGH Importance</u>	<u>MEDIUM Importance</u>	<u>LOW Importance</u>	<u>Not Important</u>

Strategy Examples

- Create a community task force (including private sector, government, nonprofits) to implement best communication practices for spreading information on:
 - Tenants' rights
 - Housing programs (simplified application processes, accessibility modifications, repair, purchase, construction)

Rate Goals

Goal G: Improve quality and management of publicly supported housing

Any comments? Please use notes provided and stick on the accompanying comment board

<u>HIGH Importance</u>	<u>MEDIUM Importance</u>	<u>LOW Importance</u>	<u>Not Important</u>

Strategy Examples

- Share information to solve and prevent problems where publicly supported housing is located

Additional Goals

What other goal(s) would you like your city and/or housing agency to pursue?

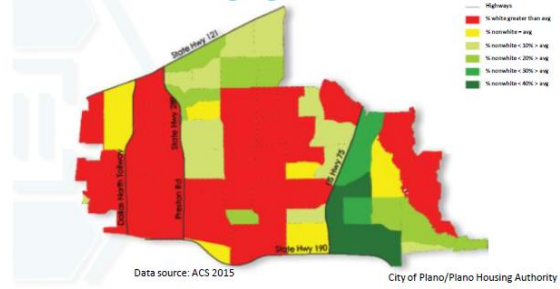
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Comments

Please stick your comments on this board.



Racial Segregation

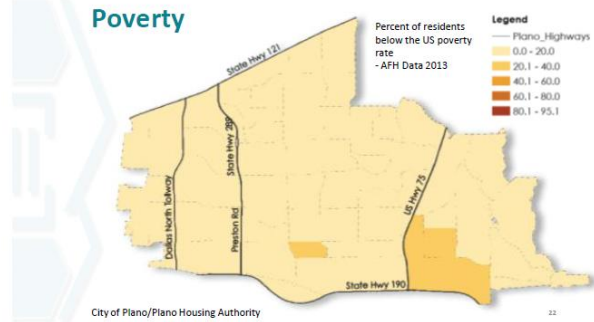


Racial Segregation Plano Housing Authority Jurisdiction



Data source: ACS 2015
City of Plano/Plano Housing Authority

Poverty



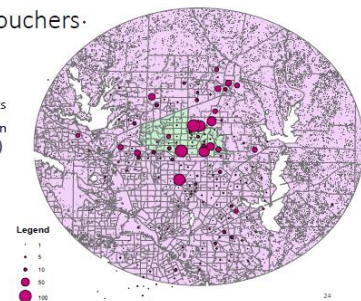
Low Income Housing Gap (LIHTCs)

NTRHA Cities	# of LIHTC Units TDHCA 2017	# of Housing Units LIHTCs of Total Housing Units (2017)	% Total Households < 25% Annual Income (2016 ACS)	Median Household Income (ACS 2016)	52% as % of Median Household Income (2016 ACS)
Cleburne	703	11,302	6.2%	\$ 49,573	50%
Fort Worth	13,698	314,761	4.4%	\$ 54,876	46%
Denton	2,156	52,044	4.1%	\$ 50,487	50%
Dallas	20,116	542,928	3.7%	\$ 42,215	55%
McKinney	2,262	61,220	3.7%	\$ 83,257	30%
Garland	1,287	82,787	1.6%	\$ 53,220	47%
Irving	1,322	96,160	1.4%	\$ 54,868	47%
Plano	1,174	109,813	1.1%	\$ 85,085	29%
Frisco	404	58,150	0.7%	\$ 117,642	21%

LIHTC = Low Income Housing Tax Credit projects

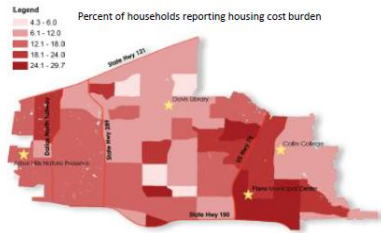
Location of PHA Vouchers

- 1064 PHA HCVs (Households) spread over 239 Census Tracts
- 345 PHA HCVs (32%) in 6 Census Tracts (2.5%)
- 423 PHA HCVs (40%) used within City of Plano



Where are people struggling with affordability?

Up to 29% of households in Plano report spending more than 30% of their income on housing and utilities (darkest shaded areas).



Housing Cost Burden: Plano 2008-2012 CHAS/ACS Data

Public Comments and Responses

The comments below were received during the public comment period for the draft AFH document, which took place December 10, 2018 through January 14, 2019. Responses from the City are provided below each comment.

1. **Comment:** Robin LeoGrande of Community for Permanent Supported Housing provided input throughout the development of the AFH and spoke at the Public Hearing on January 14, 2019. Her comments at the hearing reiterated the need for safe, affordable housing with supports for persons with disabilities.

Response: Comment accepted. AFH goals of increasing supply of affordable housing units and increasing supply of accessible, affordable housing for persons with disabilities both address this need.

Comments 2-9 were submitted in a letter from Inclusive Communities Project (ICP) on January 11, 2019. Demetria McCain of ICP also spoke at the Public Hearing on January 14, 2019 and summarized comments from the letter.

2. **Comment:** The AFFH webinar hosted by ICP (page 15), references the wrong name. Reference should be made to “VFO Webinar” (Voices for Opportunity), instead of “VRO webinar”.

A list of ICP meeting participants (page 20) includes Elizabeth Julian. Her correct title at the time was “Founder and Senior Counsel” instead of “Treasurer”.

Response: Comment accepted. The errors were corrected.

3. **Comment:** The City should ensure that it affirmatively furthers fair housing despite its restricting requirement (under its Concerted Revitalization Plan) that its new 1,000 units of affordable housing be adjacent to public transit. (p. 44)

Response: Comment accepted. The 1,000 new units of housing mentioned in the Concerted Revitalization Plan (CRP) do not all have to be affordable. Page 44 has been edited to reflect the language of the CRP. The goal of 1,000 new units of housing is referenced on page 20 of the City’s Downtown Plano Vision and Strategy Plan, which is one component of the CRP. The Vision and Strategy plan states that 1,000 units of housing should be developed within ½ mile of the Downtown Plano DART Station, while promoting “a variety of housing types and price points.”

4. **Comment:** The report makes no mention of what its new AFH marketing plan (p. 45) did. There is no mention of whom or at what it targeted and what findings and results came out of the plan’s creation.

Response: Comment accepted. While HUD regulations only require an Affirmative Fair Housing Marketing Plan (AFHMP) for projects with five or more units, the City implemented affirmative marketing procedures for its First Time Homebuyer program

and investor-owner rehabilitation projects in January 2018. These procedures ensure the units assisted under these programs are broadly marketed and encourage participation of all income-eligible households. The affirmative marketing procedures for all programs are currently being updated and revised, following the conclusion of the AFH process. Processes and results will be tracked and the policy will be updated accordingly.

5. **Comment:** None of the 2015-2019 goals address segregation (p. 47). There is no mention of the unbalanced racial/ethnic distribution between western and eastern Plano. With a clear difference in the report of where the most resources such as job centers are (i.e. the western portion), this is an important point to highlight. More discussion is given in this section to activities promoting medical and dental services than segregation.

Response: Comment not accepted. The goals on page 47 are from the City's 2015-2019 Consolidated Plan, a document which set targets for the activities that the City planned to undertake with HUD funding for the current five-year cycle. This section is a review of the City's past actions and also includes goals from the last Analysis of Impediments to Fair Housing Choice, while the new AFH goals can be found on pages 221-224 of the AFH. These will be incorporated into the 2020-2024 Consolidated Plan.

6. **Comment:** The City should conduct an affordable housing impact analysis, focusing on moderate and low income residents, when it is recruiting corporations to move to the City. Done right, this would help address potential displacement and the number of new low income units needed as new workers flock to Plano. As corporations seek resources from the City, the City should require corporations to contribute to a housing trust fund that would target housing for families under 50% AMI and add units near corporate centers.

Response: Comment accepted. Currently, the City does not have a housing trust fund. However, the possibility of creating a housing trust fund and other policies that address affordable housing will be considered during the City's housing policy creation and implementation phase.

7. **Comment:** The City should ensure that it affirmatively furthers fair housing while it focus on neighborhood "compatibility" of new development (p. 50). Too often "compatibility" has been used as cover to block affordable housing that would likely attract low income residents of color.

Response: Comment accepted. The term "compatibility" refers to the inclusion of any housing units in anticipated neighborhood center redevelopment projects and is not limited to affordable housing. The City has conducted various analyses that examine the cohesiveness of neighborhood centers across the City, including, but not limited to, a housing value retention analysis. The City will consider this concern during the City's housing policy creation and implementation phase.

8. **Comment:** The City's prior activities have been heavy on homeownership and light on rental programs. The workforce that helps support the booming economic development

that Plano is experiencing often falls in income brackets of households who rent because they are not yet in a higher income band.

Response: Comment accepted. The City will begin its next five-year consolidated planning process for HUD funding later this year, and the resulting plan will cover grant years 2020-2024. During this process, market conditions and city demographics will be analyzed along with public input to determine the City's affordable housing activities that will be supported through the use of HUD funds.

9. **Comment:** The report frequently references "opportunity areas" but provides no definition particularly relative to race. Because the report and City seek to address residential segregation, this is a critically important missing element.

Response: The City defines high opportunity area as those with an area median income (AMI) greater than 80% or a poverty rate of 10% or less. The AFH has been corrected on page 12 and page 168 to define opportunity area. Areas in the City with higher median incomes and lower poverty are closely correlated to those areas with lower concentrations of black and Hispanic residents and greater white population share.

10. **Comment:** The report identifies and lists policies that contribute to segregation (p. 68) but elsewhere in the report it does not state how it might address them. Several measures should be taken as Plano develops its housing policy while trying to remedy its segregation.

- The City should facilitate a sublease program for voucher holders to address voucher discrimination by landlords. The fact that one-third of vouchers expire because families could not lease up is not acceptable. The City could use its resources and leverage to recruit owners to participate, and a nonprofit could enter into leases with the owners with the purpose of subleasing to voucher families. This model has recently begun in Houston through a local nonprofit with support from funds raised by the City of Houston. It is also the model that ICP created two years ago as a demonstration program with owners who have since expressed pleasure with the program.
- With the vast number of market rate housing being built with developers requesting variances and other support from the City, Plano should create a voluntary inclusionary zoning/housing mechanism that would require something from developers for such request while ensuring that a certain percentage of units within the new development lease at rents affordable to families below 50% AMI. One way of achieving this would be to have developers take vouchers, subsidies for which are at market rate. The report notes (p. 72) that vouchers are concentrated in a small portion of census tracts. This would help open other areas to voucher families.
- The City could lobby at the state level for repeal of the ban that prevents local jurisdictions from passing ordinances that would (1) block voucher discrimination and (2) allow for mandatory inclusionary zoning/housing, respectively. The City should pass these types of ordinances because the report correctly notes that voucher discrimination is a major problem (p. 178).

- The report notes that low income housing tax credit units house a significant number of the voucher holders who live in Plano (p. 72-73) and that the City does not have enough such units (p. 173). To help facilitate the development of low income housing tax credit units in the growing west side of Plano, the City could lobby at the state level for repeal of the requirement that developers obtain a letter of support from the state representative. This matter was brought up by a Plano state representative during the 85th legislative session but did not pass. State representative letters become fodder for NIMBYism, often race-based, which can block low income housing development. Its repeal should be introduced during the current 86th legislative session with encouragement and support of the City of Plano.
- Plano has unbalanced residential zoning according to the report (p. 124). The City should address its zoning so that it can facilitate more multifamily housing in the western part of Plano, where the report notes schools are highest perform (p. 98) and employers abound (p. 109). Although the City has created a policy through which it decides if it should support a developer's low income housing tax credit application, several opportunities for low income housing units die when the developer seeks a zoning change. Were there more tracts zoned multifamily, this might occur less often.

Response: All suggested programs and policies described in these bullet points will be considered during the City's housing policy creation and implementation phase. Regarding bullet point four, that the City should lobby for repeal of the requirement that developers obtain a letter of support from the state representative for the low income housing tax credit program, the City has provided written support for every bill that sought to repeal this requirement.