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August 15, 2016

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Re: ICP Comment on HUD, "Establishing a More Effective Fair Market Rent System; Using Small Area Fair Market Rents in Housing Choice Voucher Program Instead of the Current 50th Percentile FMRs," 81 Fed. Reg. 39218 (June 16, 2016), Docket Number FR-5855-P-02

We represent the Inclusive Communities Project, Inc, a non-profit fair housing organization that assists voucher holders who want desegregated housing opportunities in the Dallas area.

Summary

This ICP comment supports the required use of SAFMRs as a remedy for racial segregation in the voucher program. However, HUD's proposal to limit the areas for SAFMR designation using arbitrary and artificial formulas will perpetuate racial segregation. ICP's comment sets out in detail the following summarized objections to the HUD proposed method for designating areas for SAFMR use:

- **HUD's policy setting conditions for the use of SAFMRs ignores the racial segregation in the voucher program.**

- HUD's own data shows the extreme racial segregation in the areas that HUD refuses to designate for SAFMR use.
- The racial segregation includes the disproportionate distribution of White non-Hispanic voucher holders in White census tracts and Minority voucher holders in minority census tracts in areas denied designation for SAFMR use.
- The extreme differences in the tract poverty levels for White non-Hispanic voucher holders compared to the tract poverty levels for Minority

voucher holders is itself an unequal condition of the segregation.

• HUD's voucher concentration ratio is an arbitrary and artificial standard created without any justification in policy or statistics and that perpetuates racial segregation.

• The HUD concentration ratio requires that a voucher holder must be 55% more likely to be located in a high poverty tract than the average renter occupied unit. HUD presents no justification for a 55% higher probability rather than 40%, 30%, 20% or 10% higher probability.

• The HUD concentration rule ignores the Raj Chetty research by refusing to designate areas where concentrated poverty inflicts severe and measurable injuries on children.

• The possible discretionary application for and discretionary HUD approval for the future use of SAFMRs is unlikely given HUD's determination that the voucher concentration ratio defines the areas where concentration is not a problem to be solved and thus there is no reason to impose a deconcentration policy.

• The proposed policy will leave hundreds of thousands of voucher families in HUD Metro FMR Areas all over the country isolated in racially segregated areas many of which are marked by conditions of slum and blight because those conditions do not meet HUD's standards set for purposes of "potential" administrative convenience.

• The use of the voucher and renter occupied CLIA ratios for all Metro FMR areas to deny SAFMR designation status for Dallas will perpetuate racial segregation in Dallas.

Introduction

ICP is a Dallas based fair housing organization that works to create and maintain racially and economically inclusive communities and to expand fair and affordable housing opportunities for low income families. ICP is chartered to help low-income persons obtain affordable housing in decent and safe conditions free from the vestiges of racial discrimination and segregation and in neighborhoods with adequate services and facilities. ICP's Mobility Assistance Program (MAP) is a longstanding housing mobility program serving Dallas Housing Authority (DHA) Housing Choice Voucher (HCV) families seeking racially integrated housing opportunities in Dallas and the Dallas area.

ICP strongly supports the use of SAFMRs that align with market rents and provide an

adequate supply of housing in high opportunity areas for voucher holders. Such SAFMRs are a necessary condition for the elimination of racial segregation in the voucher program. ICP believes that Small Area FMRs gives HCV tenants a more effective means to move out of racially segregated minority areas into areas of higher opportunity and lower poverty areas by providing them with subsidy adequate to make such areas accessible. The SAFMRs will thereby reduce the number of voucher families that reside in racially segregated areas marked by conditions of slum and blight. But HUD's proposed policy ignores racial segregation and imposes arbitrary, artificial, and unnecessary conditions for the use of SAFMRs and thereby perpetuates racial segregation. The proposed policy is likely to eliminate the Dallas, TX FMR Area as a designated SAFMR area.¹ The possibility of a subsequent discretionary request by local PHAs and the possibility of a subsequent discretionary approval by HUD will still impose a substantial barrier to the availability of dwelling units because of racial segregation and will perpetuate that racial segregation.

HUD must implement SAFMRs where needed to comply with HUD's Fair Housing Act obligations. HUD must administer the SAFMR element of the housing choice voucher program in a manner that includes taking into account avoiding increased minority concentration in high poverty, low income areas and, over time, reducing such concentrations. *N.A.A.C.P., Boston Chapter v. Secretary of Housing and Urban Development*, 817 F.2d. 149, 154-158 (1st Cir. 1987).

HUD's policy setting conditions for the use of SAFMRs perpetuates racial segregation by ignoring the racial segregation in the voucher program.

HUD's housing choice voucher program is racially segregated in most areas of the country. Nationwide, the 2 million plus vouchers are located in census tracts that are on average 56% minority. HUD, Picture of Subsidized Housing, US Total, 2015 based on 2010 Census.² HUD has made available the data and the maps showing the racial segregation of vouchers into concentrated minority areas with extremely high poverty to every CDBG grantee in the country.³ HUD's current Fair Market Rent setting process has been a causal factor creating, maintaining,

¹ HUD, pursuant to a lawsuit settlement, designated Dallas for SAFMR use in 2010 and set adequate SAFMRs for use in 2011. This is the year studied by Collinson and Ganong. Then from 2012 through 2015, HUD substantially reduced many of the SAFMRs in White non-Hispanic Zip Codes and substantially increased many of the SAFMRs in minority Zip Codes. A second ICP lawsuit resulted in a second settlement for the "Guidance" setting out the process to provide SAFMRs at the 40th percentile level for all Zip Codes.

² <https://www.huduser.gov/portal/datasets/picture/yearlydata.html>

³ Maps and data at <https://egis.hud.gov/affht/>; data at <https://www.hudexchange.info/resource/4868/affh-raw-data/>.

and perpetuating this racial segregation. The GAO has been pointing out this effect for decades.⁴ In the Dallas FMR Area, 91% of the minority voucher families are located in predominantly minority census tracts compared to 73% of the White non-Hispanic voucher holders in those tracts. There are no Dallas area voucher holders located in 90% or greater White non-Hispanic census tracts. Attached ICP Tables 1, 2.

HUD and its grantees all have the duty to affirmatively further fair housing which includes taking meaningful action to overcome patterns of racial segregation. 42 U.S.C. § 3608(e)(5). HUD specifically included the consideration of racial segregation as a requirement of affirmatively furthering fair housing when it set the original criteria for the use of SAFMRs. In announcing the Demonstration Project for SAFMRs, HUD stated:

The following lists the selection criteria for participation:

...

4. Racial Segregation—In order to affirmatively further fair housing, a CBSA’s racial segregation will be assessed based on the non-Hispanic White/all minority Dissimilarity Index calculated at the census tract level for the CBSA from 2010 Decennial Census data. . . . DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT [Docket No. FR-5413-N-02] Section 8 Housing Choice Voucher Program—Demonstration Project of Small Area Fair Market Rents in Certain Metropolitan Areas, Discussion of Comments, and Request for Participation, 76 Fed. Reg. 22122, 22126, April 20, 2011.

But under the 2016 proposed policy, HUD ignores the racial segregation and exclusion of minority voucher families from non-minority areas and directs the PHAs to do the same. Instead of meaningful action to overcome patterns of racial segregation HUD compares poverty and income measures for all vouchers families, minority and non-minority, to all renter occupied units. The comparison is then measured by an arbitrary and artificial concentration ratio of 1.55. This concentration ratio was not used for either the 50th Percentile payment standard calculation or for the Demonstration Project for SAFMRs.

HUD’s own data shows the extreme racial segregation in the areas that HUD refuses to designate for SAFMR use.⁵ The capriciously chosen concentration ratio makes 22 HUD Metro

⁴ Comptroller General, “Major Changes Are Needed in the New Leased Housing Program, 1977, CED-77-19, pages 3, 43; GAO, “Deconcentration of Low-Income Persons Through Section 8 Housing Assistance,” 1978, pages “document resume”, 1, Enclosure I, page 2;

⁵ HUD’s published data for the proposed regulation contains no racial information for voucher participants or census tracts. In order to analyze and show the racial segregation perpetuated by the proposal, ICP uses the HUD Picture of Subsidized Housing, Housing Voucher Program, census tract data for race of the voucher holders and the U.S. Census 2010 - 2014

FMR Areas each with more than 10,000 vouchers ineligible for SAFMR designation.⁶ There are 517,099 voucher holders in these ineligible FMR areas. This is almost as many as in all of the FMR Areas designated for SAFMR use, 563,814. ICP Table 1; HUD Selection Tool. The segregation in all but two of these ineligible FMR areas exceeds the HUD definition of “High Segregation” based on the U.S. Census Dissimilarity Index.⁷ The High Segregation index ratings for these areas ranges from 86.7 (Detroit) to 57.9 (Seattle). By contrast, HUD’s policy will designate 7 HUD Metro FMR Areas to be eligible for SAFMRs where the segregation is within the HUD range for only “Moderate Segregation.”⁸ ICP Table 3. HUD refuses to take into account the Dissimilarity Index or any other measure of racial segregation in its current SAFMR designation policy. HUD’s grantees are required to do so in order to comply with the obligation to affirmatively further fair housing.⁹ HUD also has the affirmatively further fair housing duty to consider the effect of its policy decisions on patterns of racial segregation. *N.A.A.C.P. v. Sec’y of Hous. & Urban Dev.*, 817 F.2d 149, 155 (1st Cir. 1987).

The HUD data shows the extreme segregation of voucher holders in the ineligible HUD Metro FMR Areas in which the percentage of minority voucher holders residing in minority census tracts is equal to or exceeds 75%. One FMR Area, Miami, has 100% of the minority vouchers in minority areas. Los Angeles has 97% of the minority vouchers in minority areas. Other examples are Fresno (96%), Newark (96%), Houston (93%), Riverside (92%), Anaheim (91%). Dallas has 91% of the minority voucher families in minority areas. Three of the eligible HUD Metro FMR Areas designated as eligible have less than 50% of the minority voucher families in minority areas: Tacoma-Lakewood, WA Metro Division (49%); Colorado Springs, CO HUD Metro FMR Area (41%); and Palm Bay-Melbourne-Titusville, FL MSA (24%). ICP

American Community Survey census tract data for the race of the population in the census tracts. ICP analyzed the minority voucher holder and minority census tract data for all of the HUD Metro FMR Areas discussed in this comment and included in the attached ICP Tables.

⁶ The Voucher Concentration makes many more FMR Areas ineligible for SAFMR designation. This comment focuses only on the larger urban areas with at least 10,000 vouchers according to the HUD Selection Tool.

⁷ U.S. Census, CensusScope, SEGREGATION: DISSIMILARITY INDICES US Metro Areas Ranked by White/Black Dissimilarity Index, at http://www.censuscope.org/us/rank_dissimilarity_white_black.html; HUD AFFH Data Documentation page 11, A. Analyzing Segregation, Dissimilarity Index, High Segregation if the Dissimilarity Index is 55 or higher. Moderate Segregation from 40 to 54. Low Segregation at less than 40.

⁸ Not all of the 6 have 10,000 or more vouchers.

⁹ HUD, Assessment of Fair Housing Tool, page 5. Available at https://www.huduser.gov/portal/affht_pt.html#affhassess-tab.

Table 1.

The racial segregation includes the disproportionate distribution of White non-Hispanic voucher holders in White census tracts and Minority voucher holders in minority census tracts in areas denied designation for SAFMR use. Nine of the ineligible HUD Metro FMR Areas have at least a gap of at least 40 percentage points between the percent of minority vouchers in minority tracts and the percent of White non-Hispanic vouchers in minority tracts. For example, there is a 56 percentage point difference between the 75% of minority vouchers in Detroit minority census tracts and the 19% of White non-Hispanic vouchers in Detroit minority census tracts. ICP Table 4.

The attached ICP Table 5 shows that the racial segregation in the highlighted ineligible areas is also segregation into unequal conditions. This is shown by the large difference between the percent of minority voucher families in concentrated low income areas and the lower percent of White voucher families in concentrated low income areas. For example, 48% of the minority voucher families in the Newark HUD Metro FMR Area are in tracts with 25% or higher poverty rates while only 10% of the White non-Hispanic voucher families in that FMR Area are in such tracts. ICP Table 5.

HUD recognizes that the perpetuation of racial segregation injures the voucher families and the entire community.

These racially or ethnically concentrated areas of poverty merit special attention because the costs they impose extend far beyond their residents, who suffer due to their limited access to high-quality educational opportunities, stable employment, and other prospects for economic success. Because of their high levels of unemployment, capital disinvestment, and other stressors, these neighborhoods often experience a range of negative outcomes such as exposure to poverty, heightened levels of crime, negative environmental health hazards, low educational attainment, and other challenges that require extra attention and resources from the larger communities of which they are a part. HUD, Affirmatively Furthering Fair Housing; Proposed Rule, 78 Fed. Reg. 43710, 43714, July 10, 2013.

The extreme differences in the tract poverty levels for White non-Hispanic voucher holders compared to the tract poverty levels for Minority voucher holders is itself an unequal condition of the segregation. The ineligible areas are also marked by substantial disparities between the higher percentage of White non-Hispanic voucher families in low poverty (less than 10%) areas and the substantially lower percentage of minority voucher families in the same low poverty areas. In the non-eligible Newark FMR Area, 53% of the White non-Hispanic voucher families are in census tracts with less than 10% poverty. By contrast, only 9% of the non-eligible Newark FMR Area minority families are in less than 10% poverty tracts. The disparity in the Westchester County Exception Area is 51% White non-Hispanic HCVs and 17% minority HCVs

in less than 10% poverty tracts. The disparity in the non-eligible Baltimore FMR area is 44% White non-Hispanic HCVs and 22% minority HCVs in less than 10% poverty tracts. By contrast, the SAFMR designated Monmouth-Ocean NJ HUD Metro FMR Area shows 24% of White non-Hispanic voucher families in 10% or less poverty tracts and 29% of minority voucher families in those tracts. The attached ICP Table 6 sets out the data for the selected FMR Areas.

HUD's exclusion of the HUD Metro FMR Areas with substantial disparities between White non-Hispanic voucher families' access to non-low income concentrated areas and minority voucher families' access imposes a discriminatory adverse impact on the minority families and perpetuates racial segregation.

HUD's voucher concentration ratio is an arbitrary and artificial standard created without any justification in policy or statistics and that perpetuates racial segregation.

The HUD concentration ratio requires that a voucher holder must be 55% more likely to be located in a high poverty tract than the average renter occupied unit. HUD presents no justification for a 55% higher probability rather than 40%, 30%, 20% or 10% higher probability. The only basis stated is that it is the weighted average for the nation. HUD does not attempt to explain why this is a better measure than the voucher concentration measure used in the Demonstration Project for SAFMRs and in the longstanding 50th Percentile payment standard regulation.¹⁰

The 55 percent standard does not recognize the undisputable fact that renter occupied housing is already overconcentrated in low income areas. Voucher households, constrained by HUD's FMR Area wide Fair Market Rents, are already concentrated by the location of renter occupied units. As of the 2011 American Community Survey data, 45 percent of occupied rental homes in the 100 largest metropolitan areas were located in low-income neighborhoods but only 28% of the households were in these areas. Joint Center for Housing Studies of Harvard University, "America's Rental Housing Evolving Markets and Needs," 2013, pages 4, 16. This low income housing is overconcentrated in the central cities of these metropolitan areas. *Id.* at page 16. The residents of the rental housing in the low income areas are also disproportionately low income. 50% or more of renters have incomes below \$30,000 per year. *Id.* at page 3.

HUD has provided no statistical or scientific basis for the use of either the voucher concentration standard in general or of the 1.55 minimum ratio specifically. 81 Fed. Reg. 39218; HUD, "Frequently Asked Questions," questions 15, 17, page 6, available at <https://www.huduser.gov/portal/datasets/fmr/smallarea/index.html>. HUD claims that the

¹⁰ DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT [Docket No. FR-5413-N-02] Section 8 Housing Choice Voucher Program—Demonstration Project of Small Area Fair Market Rents in Certain Metropolitan Areas, Discussion of Comments, and Request for Participation, 76 Fed. Reg. 22122, 22126, April 20, 2011; 24 C.F.R. § 888.113(c)(1)(iii).

requirement that vouchers be 55% more concentrated in high poverty areas than renter occupied units shows the “propensity or likelihood that a voucher holder is more likely to live in a concentrated low-income area than are renters in general.” 81 Fed. Reg. 39222. As a propensity to live in a concentrated low income area (CLIA), the 1.55 concentration eligibility ratio requires at least a 55 percent gap between the percent of vouchers in CLIA and the percent of renter occupied units in CLIA. But this percentage has very different effects depending on the magnitude of the percent of the vouchers and the percent of renter occupied units in low income areas.

For example, the Nassau County-Suffolk County NY Metro Division has an eligible concentration ratio of 1.9035 and is designated for SAFMR use. The voucher concentration is only 12.5% in concentrated low income areas. The occupied renter unit concentration is only 6.6% in concentrated low income areas. The gap is only 5.9 percentage points. By comparison the Phoenix-Mesa-Glendale, AZ MSA has a concentration ratio of only 1.2160 and is ineligible for SAFMR designation. Yet it has a 6.5 percentage point gap between the substantially more concentrated vouchers, 36% concentrated, and the renter occupied units, 30%. Yet the small difference establishes Nassau County as eligible for SAFMR designation and Phoenix as not eligible. ICP Table 7.

Another example of the arbitrary and artificial results from the concentration ratio is shown in the comparison of the Cleveland area to the Washington, D.C Metro Area. 51% of the vouchers in the Cleveland-Elyria-Mentor, OH MSA are concentrated in low income areas. This is 14 percentage points higher than the 37% of renter occupied units in low income areas. But the resulting concentration ratio, 1.3845, makes the area ineligible for SAFMR designation. By comparison a 14 percentage point gap makes the Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area eligible for SAFMR designation with a ratio of 1.6647. Thus the D.C. Metro Area is designated for SAFMR use even though both the vouchers at 35% and the renter occupied units at 21% are substantially less concentrated than in Cleveland. The attached ICP Table 7 shows these and additional examples of the arbitrary and artificial results of the arbitrary and artificial concentration ratio. ICP Table 7.

HUD’s presentation of the voucher concentration ratio conceals the actual and wide disparity between the higher percentage of vouchers in concentrated low income areas and the much lower percentage of renter occupied units in those areas in many of the HUD Metro FMR Areas. These disparities are substantial whether or not the arbitrary 1.55 concentration ratio is met. HUD’s presentation also conceals the relatively close voucher and renter occupied unit ratios in some Metro FMR Areas where the concentration ratio is met but there are only low levels of voucher and renter occupied unit concentrations. The use of the voucher/renter occupied unit concentration also conceals the wide disparities in the lower concentration of White non-Hispanic voucher families and the substantially higher concentration of minority voucher families. Compare the Selection Tool with attached ICP Table 5.

HUD's voucher concentration rule ignores the Raj Chetty research showing the urban areas where concentrated poverty inflicts severe injuries on children and their futures.

HUD cites the Raj Chetty research for its general finding on the effect of concentrated poverty.

Recent research demonstrates that long term outcomes for families are improved the sooner the family is able to move out of areas with high poverty rates. Fn.10 Chetty, Raj, Nathaniel Hendren, and Lawrence Katz, 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Project." American Economic Review 106 (4). 81 Fed. Reg. 39224.

HUD's arbitrary concentration ratio ignores the location by location determination made by Chetty to show which urban areas impose the highest degree of injury on the families in areas with high poverty rates. HUD's concentrated low income policy will designate areas for SAFMR use where the Chetty research shows that the effect of concentrated poverty on "all kids" is still a positive number: San Diego, Pittsburgh, San Jose, Fort Worth. HUD's proposed policy will designate areas as not having poverty concentration issues where the effect of concentrated poverty on "all kids" is substantially negative according to the Chetty research: Los Angeles, Dallas, Baltimore, Detroit, Miami, St. Louis, Cincinnati, Newark, Kansas City, Columbus OH, and Fresno.¹¹

The use of a concentration ratio that misses the substantial difference shown by the Chetty research in the degree of injuries inflicted upon voucher families shows the arbitrary and artificial character of the proposed concentration ratio. The proposal to exclude the voucher families who live in the Chetty high injury areas from the use of the SAFMRs imposes a discriminatory adverse impact on a predominantly minority population and perpetuates racial segregation.

HUD is not phasing in SAFMRs but is rather setting a standard for determining whether or not an area is eligible for SAFMRs.

HUD's proposed policy divides the nation's HUD Metro FMR Areas by whether or not the specified concentration ratio and the minimum, available units requirements are satisfied. HUD Metro FMR Areas that do not meet the minimum voucher concentration ratio are described by HUD as areas where voucher tenants are not especially concentrated in high-poverty areas and thus "There is no problem to be solved. . . ." The VC ratio is meant to "validate that the HCV population are unevenly distributed before implementing the program. If not, then there is no reason to impose the potential administrative costs of a deconcentration policy." 81 Fed. Reg. at

¹¹ Chetty, Equality of Opportunity, <http://www.equality-of-opportunity.org/index.php/city-rankings/city-rankings-100>.

39324.

HUD's proposal to provide a completely discretionary and arbitrary process for PHAs in non-designated areas to possibly make a written request to use the SAFMRs and for HUD to possibly approve that request does not eliminate the discriminatory effects of the proposed designation policy.¹² The proposed policy specifically discourages any local action to request approval for the use of SAFMRs by the proposed finding that if an area does not meet the HUD concentration ratio, then there is no reason to impose the potential administrative costs of a deconcentration policy. 81 Fed. Reg. at 39324. The proposed policy does not set any standard for the exercise of HUD's discretion to grant any such local requests other than the already determined HUD conclusion that unless the concentration ratio is met, there is no reason for incurring the potential administrative costs. Waiting five years for a possible designation using new data, the other HUD alternative, does not eliminate the discriminatory effect of the policy during those five years. 81 Fed. Reg. 39220.

The proposed policy will leave hundreds of thousands of voucher families in HUD Metro FMR Areas all over the country isolated in racially segregated areas many of which are marked by conditions of slum and blight because those conditions do not meet HUD's arbitrary and artificial standards set for purposes of "potential" administrative costs. HUD does not attempt to show that the possibility of administrative costs justifies the uncontested perpetuation of racial segregation that will result. The promised remedial effects from use of the SAFMRs are clearly required for voucher families living in the large, racially segregated, inner city areas excluded by the proposed policy. More than an unsupported assertion of potential administrative costs is required to justify the exclusion.

The use of the voucher and renter occupied CLIA ratios for all Metro FMR areas to deny SAFMR designation status for Dallas will perpetuate racial segregation in Dallas.

HUD's concentration ratio will perpetuate racial segregation in the Dallas FMR Area if that area is not designated as appropriate for SAFMRs under the final rule. Under the proposed designation, the Dallas FMR Area meets the ratio only by virtue of a rounding convention at the ten thousandth decimal place. HUD's policy will put ICP and its clients at a significant disadvantage if the Dallas FMR Area is not designated as appropriate for SAFMR use. The reversion to the FMR Area Fair Market Rents will end any progress from the use of SAFMRs in mitigating racial segregation. While there is a process for the local PHA to seek approval from HUD,¹³ both the local PHA and HUD will have to decide to surmount the obstacle of HUD's

¹² The proposal is in the proposed 24 C.F.R. § 888.113(c)(3) at 81 Fed. Reg. 39227.

¹³ A PHA administering an HCV program in a metropolitan area not subject to the application of Small Area FMRs may opt to use Small Area FMRs by seeking approval from HUD's Office of Public and Indian Housing (PIH) through written request to PIH. 81 Fed. Reg.

determination that the Dallas FMR Area is not appropriate for SAFMRs.¹⁴

The proposed rule is a policy that allows the Dallas FMR Area to meet the conditions for designation as an SAFMR area only as a result of a rounding convention if at all. The proposed policy defines FMR areas for designation as SAFMR areas only if the voucher concentration ratio is greater than 1.55 or greater than 1.548 by rounding. SAFMR Proposed Rule FAQ, pages 6 - 7. The Dallas FMR Area voucher concentration ratio calculated by HUD is 1.544955957.¹⁵ This is a very narrow margin which may decrease even more if HUD uses new data to recalculate area eligibility even if it does adopt the proposed rule.¹⁶

The ineligibility of the Los Angeles-Long Beach-Glendale, CA Metro Division FMR Area for SAFMR designation emphasizes the effect of differences at the ten thousandth decimal place and the fragility of HUD's tentative designation of the Dallas FMR Area as appropriate for SAFMRs under the proposed policy. The Los Angeles FMR area meets the 2,500 minimum voucher requirement with 81,404 Vouchers. The area has 27.38% of rental units in Zip Codes with SAFMRs higher than 110% of the area FMR and thus meets the second condition for approval as an SAFMR designated area. But its Voucher Concentration ratio is 1.544682581, 0.000273376 less than the Dallas VC and thus HUD does not list the area for SAFMR designation. Selection Tool, Tab BR.

The narrowness of the margin is more apparent when Dallas is compared to the data for the Cincinnati-Middleton, OH-KY-IN HUD Metro FMR Area. The Selection Tool shows this area has 17,502 vouchers and meets the minimum number of vouchers condition for the appropriate use of SAFMRs. The Selection Tool shows this area has 21.93% of rental units in Zip Codes with SAFMRs over 110% of the Area FMR and thus meets the condition that there be at least 20% of such units. But while the Voucher Concentration in Concentrated Low Income Areas (VC) at 1.545380237 is slightly higher by 0.00042428 than the VC for Dallas, HUD's

39227, proposed 24 C.F.R. § 888.113(c)(3).

¹⁴ HUD Metro FMR Areas that do meet the minimum VC ratio are described by HUD as areas where voucher tenants are not especially concentrated in high-poverty areas and thus "There is no problem to be solved. . . ." The VC ratio is meant to "validate that the HCV population are unevenly distributed before implementing the program. If not, then there is no reason to impose the potential administrative costs of a deconcentration policy." 81 Fed. Reg. at 39324.

¹⁵ Tab BR in SAFMR-HMFA-Selection-Tool-Proposed-Rule.xlsx available at: <https://www.huduser.gov/portal/datasets/fmr/fmr2016p/SAFMR-HMFA-Selection-Tool-Proposed-Rule.xlsx>. (Selection Tool BR).

¹⁶ See HUD FAQ 12 promising recalculation with newer data if the proposal becomes the final rule. SAFMR Proposed Rule FAQ.

proposed policy does not include the Cincinnati-Middleton, OH-KY-IN HUD Metro FMR Area for SAFMR designated use. Selection Tool, Tab BR.

The use of such infinitesimal differences to decide whether a major urban area should be designated for SAFMRs is proof of the arbitrary and artificial character of the proposed policy. The use of this arbitrary, artificial, and unnecessary ratio cannot be justified by the asserted interest in administrative convenience. The Dallas HUD Metro FMR Area PHAs have been administering SAFMRs since 2011. If any administrative inconvenience was inflicted at the beginning, it is now in the past and cannot justify removing the area's designation as an appropriate area for the use of SAFMRs.¹⁷

The Dallas FMR Area remains racially segregated with many of the minority voucher families residing in high poverty, low income census tracts. The Dallas Metro FMR area is Highly Segregated according to HUD's standard with a White/Black Dissimilarity Index of 64.4. The Dallas Metro FMR Area is located in a Chetty Commuting Zone where the poverty concentrations have a direct and measurable negative effect on the lives of the children in those areas.¹⁸ There are 13,930 voucher families with children in less than 50% minority tracts in the Dallas FMR Area where the children are subject to the injuries of racial segregation and concentrated poverty.¹⁹

The existence of racially segregated voucher distributions should be the key element in designating areas for SAFMR use.

If accurately calculated 40th percentile SAFMRs provide more desegregated housing opportunities than the FMR for an area, HUD's refusal to designate the use of the SAFMRs violates HUD's duty to affirmatively further fair housing and to otherwise comply with the Fair Housing Act, the other relevant civil rights laws, and the U.S. Constitution. The calculations to make the determination that SAFMRs will provide more desegregated housing opportunities than the FMR are not complex and the data is readily available. HUD routinely calculates SAFMRs

¹⁷ HUD has not attempted to present evidence that any administrative inconvenience to PHAs from the use of SAFMRs is legitimate interest that is necessary to the discriminatory housing practice of refusing to designate Dallas and other racially segregated areas for SAFMR use.

¹⁸ Chetty, Equality of Opportunity, <http://www.equality-of-opportunity.org/index.php/city-rankings/city-rankings-100>.

¹⁹ HUD Picture of Subsidized Housing 2015 data for the counties in the Dallas Metropolitan Division downloaded from <https://www.huduser.gov/portal/datasets/picture/yearlydata.html>

for Metro FMR Areas.²⁰ HUD posted the data necessary to calculate the 40th percentile SAFMRs for every Zip Code in the nation on the HUD website connected to this proposal.²¹ The calculations are described in the HUD Guidance published with the proposed FY 2016 SAFMRs.²² The U.S. Census provides racial and ethnic demographic data for the Zip Code Tabulation Areas that allow the calculation of the demographic effects of SAFMRs and FMRs.²³

Designate the Dallas Metro FMR Area for SAFMR use.

As set out above and in the attached ICP Tables, the voucher program in the Dallas Metro FMR Area remains racially segregated. A HUD decision to deny SAFMR designation to the Dallas area will perpetuate racial segregation in the Dallas Area. HUD should designate the Dallas Metro FMR Area for SAFMR use.

The requirement that at least 20% of renter occupied units are in Zip Codes with SAFMR above 110% of FMR is arbitrary, artificial, and unnecessary

Even for those areas that meet the 1.548 or 1.55 concentration ratio, HUD proposes a set, 20%, requirement for the number of rental units in Zip Codes with proposed SAFMRs greater than 110% of the FMR Area FMR (110% Zip Codes). HUD proposes this requirement to “ensure that the Small Area FMR is a potential solution by qualifying only housing markets with sufficient housing stock in areas with Small Area FMRs above the basic range (more than 110 percent) of the metropolitan FMR.” 81 Fed. Reg. 39234.

This 20% requirement is arbitrary, artificial, and unnecessary. HUD provides no support for the application of this particular percentage as a single, nation wide condition for the use of SAFMRs. It makes widely varying numbers of units available per voucher and per voucher in concentrated low income areas from FMR area to FMR area. For example, Hartford is designated for SAFMR use and has 21.49 % of renter occupied units in the 110% Zip Codes. This percentage of units makes 3.8 units available in the 110% Zip Codes for every Hartford voucher

²⁰ https://www.huduser.gov/portal/datasets/fmr/fmrs/index_sa.html?data=fy2016.

²¹ Distribution of Adjusted Standard Quality Units by Zip Code Tabulation Area – 00000 to 19999; Distribution of Adjusted Standard Quality Units by Zip Code Tabulation Area – 20000 to 39999; Distribution of Adjusted Standard Quality Units by Zip Code Tabulation Area – 40000 to 59999; Distribution of Adjusted Standard Quality Units by Zip Code Tabulation Area – 60000 to 79999; Distribution of Adjusted Standard Quality Units by Zip Code Tabulation Area – 80000 to 99999, at <https://www.huduser.gov/portal/datasets/fmr/smallarea/index.html>

²²

https://www.huduser.gov/portal/datasets/fmr/fmr2016p/distribution_guidance_final.pdf

²³ See for example race and ethnicity data for Texas ZCTAs at <http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?ftp=table>.

in a concentrated low income area. Since every voucher family in those areas is unlikely to move at the same time to a high opportunity area, the margin is at least sufficient. But other Metro FMR Areas that do not meet the 20% standard have even higher numbers of available units in the 110% Zip Codes for each voucher in low income areas. For example, Miami has 4.8 units, Kansas City has 7 units, Boston has 8 units, and Los Angeles has 12 units for every voucher in a low income area.²⁴

HUD's refusal to designate the New Orleans-Metairie-Kenner FMR Area for SAFMR use also shows the arbitrary, artificial, and unnecessary character of the 20% of units available in 100% Zip Codes standard. New Orleans has a high voucher concentration ratio, 1.718 which is well above the 1.55 ratio required. New Orleans is not designated for SAFMR use because its percentage of available units in the 110% Zip Codes 19.1% instead of 20%. At 19.1%, New Orleans would have 2.3 units in 100% Zip Codes for every voucher in a concentrated low income tract. Had the percentage for New Orleans been the required 20%, there would have been approximately the same number of units available in the 110% Zip Codes for every voucher in a concentrated low income tract, 2.43 units instead of 2.3. HUD's distinctions without a difference are a direct product of the arbitrary and artificial calculations and formulas.

The failure to meet the condition is as likely to be the result of HUD setting inadequate SAFMRs that either make more than 40% of the units in low income, high poverty, minority concentrated Zip Codes available or fail to make at least 40% of the units in higher income, lower poverty predominantly White non-Hispanic Zip Codes available. HUD has set SAFMRs in the Dallas area that have been inadequate on both grounds.

Calculate adequate SAFMRs.

The proposed policy assumes that the calculated SAFMRs will be adequate to reduce concentrations of vouchers in high poverty areas. This assumption is given more weight by the area eligibility calculation element requiring at least 20 percent of the standard quality rental stock, within the metropolitan FMR area is in small areas (ZIP codes) where the Small Area FMR is more than 110 percent of the metropolitan FMR. Proposed 24 C.F.R. §888.113 (c)(ii).

The assumption that the calculated SAFMRs will be adequate is not justified. HUD continues to use the FMR Area wide data for two elements of the SAFMR calculation - FMR Area median rent for all units and the FMR Area 2 bedroom FMR. These elements continue to make less than 40% of the units in predominantly White non-Hispanic Zip Codes available and continue to make more than 50%, 60%, or 70% of the units in predominantly minority Zip Codes available. HUD should either eliminate the FMR Area wide elements or implement the "Guidance" ensure that the SAFMRs satisfy the 40th percentile standard. Guidance for preparing

²⁴Tab BR in SAFMR-HMFA-Selection-Tool-Proposed-Rule.xlsx available at: <https://www.huduser.gov/portal/datasets/fmr/fmr2016p/SAFMR-HMFA-Selection-Tool-Proposed-Rule.xlsx>. (Selection Tool BR).

comments on Small Area FMRs (.pdf, 364 KB); Zip Code Tabulation Area (ZCTA) Distribution Data (*.xlsx, 234 KB) at <https://www.huduser.gov/portal/datasets/fmr.html>. HUD should make the Guidance calculations for the Zip Code SAFMRs before it publishes the SAFMRs to ensure that the final SAFMRs do make 40% of the units available.

5 years between designations

The five year period between SAFMR designations imposes needless delays in making the SAFMRs available. HUD provides no justification for the delay. The American Community Survey data is updated every year. HUD has the current voucher data on hand each year.

Additional comments on other parts of the proposed rule.

ICP's comments above focus on HUD's refusal to use the correct data to determine which HUD Metro FMR Areas should be designated for SAFMR use. These comments respond to HUD subject 10. The comments on other subjects follow below.

Subject 1, use of SAFMR in project based voucher projects.

ICP supports the comment on this subject submitted by the Poverty & Race Research Action Council (PRRAC).

Subject 2 codification.

The proposed rule perpetuates racial segregation through the use of arbitrary, artificial, and unnecessary policies. The proposed rule should not be codified.

Subject 3 and 4, additional actions to alleviate impacts of any resulting decreases.

The existing legal protections from decreased payment standards will provide adequate protections for tenants. No additional protections or phasing are necessary. HUD's proposal recognizes that many of the rent subsidies to landlords in the low income/high poverty areas exceed the market rent and the reasonable rent for those areas. 81 Fed. Reg. 39221, 39226; HUD FAQs Concerning HUD's Notice of Proposed Rulemaking, page 2. HUD's 2015 Picture of Subsidized Housing data shows that 20% of all the vouchers reporting are overhoused. In urban areas, these overhoused families are more likely to reside in higher poverty areas. This supports the finding that landlords in those areas are oversubsidized since they are willing to provide larger units for the smaller bedroom rents. These facts plus the existing protections from decreased payment standards eliminate the need for additional barriers to the implementation of the SAFMRs.

The Housing Opportunity Through Modernization Act of 2016 provides each PHA the ability to shield any tenant from payment standard decreases. 42 U.S.C. 1437f(o)(1)(B). The

current regulation prohibits the hasty imposition of any payment standard decreases. 24 C.F.R. § 982.505(c)(3). The current regulation also limits the PHAs' ability to implement significant decreases affecting a substantial number of voucher families. If there is a five percent decrease in the published FMR compared to the previous FMR, the PHA must redetermine the reasonable rent before the decrease can take effect. 24 C.F.R. § 982.507(a)(2)(ii). HUD may also direct such a reexamination at any time. 24 C.F.R. § 982.507(a)(2)(iii). Should HUD choose to provide additional protections, it should take into account landlord coercion or undue pressure to keep voucher families from moving and thus eliminating an undue but profitable subsidy.

HUD and each PHA have the individual data to determine the actual effect, if any, on each individual tenant as early as the first reexamination after a payment standard decrease. At this point and if needed, relief can be put in place before the second reexamination. That relief may be the required rent reasonable review or use of the discretion to leave the prior payment standard in effect pursuant to 42 U.S.C. 1437f(o)(1)(B). There is no reason to enact blanket exemptions from SAFMR based payment standards in order to protect the subsidy expectations of landlords.

Subject 6 burden on PHAs.

HUD should provide additional funding for any PHA using SAFMRs to ensure competent and efficient implementation. Increases in the administrative fees are one way to provide the funding.

Subjects 8 and 9 groups likely to be unduly burdened and exceptions if any.

ICP's comments under subjects 3 and 4 point out that the existing protections are adequate to prevent any undue burdens.

Subject 12 exception payment standards.

ICP supports the comments of PRRAC on this subject.

Subject 13 additional data to assess the impact of the implementation of the policy

HUD should provide the U.S. Census special run of the units available by cash rent for each bedroom size in each Zip Code to allow monitoring of the percent of units being made available by the SAFMR in each Zip Code.

HUD should provide the U.S. Census and the HUD voucher data by race, income, and poverty for the census tracts and voucher families in each tract to match the criteria used for the SAFMR designation decisions. Much of this data is already available through the HUD Picture of Subsidized Housing. HUD could provide the specific ranges and information it will use in the designation formulas by race and ethnicity of the tracts and the voucher participants.

Sincerely,

s/Michael M. Daniel

s/Laura B. Beshara

attorneys for ICP

Table 1 - Percent White/Minority voucher holders in Minority tracts (< 50 % White non-Hispanic White tracts) in selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in White non-Hispanic < 50%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
	2,500	1.55	31				
New York, NY HUD Metro FMR Area	119,362	1.70469679493363	1	66%	82%	30%	94%
Los Angeles-Long Beach-Glendale, CA Metro Division	81,404	1.54468258091556	0	74%	88%	58%	97%
Chicago-Joliet-Naperville, IL HUD Metro FMR Area	62,472	1.78164152922115	1	54%	84%	41%	91%
Boston-Cambridge-Quincy, MA-NH HUD Metro FMR Area	38,514	1.40267028604204	0	31%	52%	28%	68%
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	32,631	1.74746443934000	1	38%	65%	23%	78%
Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area	32,109	1.66467711039899	1	60%	82%	61%	87%
Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area	28,697	1.60743579580320	1	62%	89%	59%	92%
Oakland-Hayward-Berkeley, CA Metro Division	28,355	1.55225007176360	1	71%	89%	72%	93%
Dallas-Plano-Irving, TX Metro Division	28,135	1.54495595712357	1	64%	87%	73%	91%
San Diego-Carlsbad-San Marcos, CA MSA	27,970	1.70769510065996	1	49%	73%	53%	84%
Houston-Baytown-Sugar Land, TX HUD Metro FMR Area	25,906	1.45929140584247	0	71%	91%	75%	93%
Baltimore-Columbia-Towson, MD MSA	23,481	1.44229804079399	0	51%	68%	34%	77%
New Orleans-Metairie-Kenner, LA HUD Metro FMR Area	23,316	1.71802308289835	0	53%	88%	51%	91%
Detroit-Warren-Livonia, MI HUD Metro FMR Area	23,290	1.44616066181301	0	39%	62%	19%	75%
Miami-Miami Beach-Kendall, FL Metro Division	22,689	1.46868637483710	0	95%	99%	95%	100%
Anaheim-Santa Ana-Irvine, CA Metro Division	20,748	1.24741789267425	0	61%	84%	68%	91%
Seattle-Bellevue-Everett, WA Metro Division	20,060	1.60091524647866	0	24%	41%	28%	56%
Cleveland-Elyria-Mentor, OH MSA	19,698	1.38453052837243	0	37%	63%	17%	76%
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	19,479	1.49830024660656	0	19%	36%	18%	47%
St. Louis, MO-IL HUD Metro FMR Area	18,297	1.75231521877068	0	30%	61%	10%	75%
Cincinnati-Middleton, OH-KY-IN HUD Metro FMR Area	17,502	1.54538023702601	0	21%	44%	9%	62%
Riverside-San Bernardino-Ontario, CA MSA	16,858	1.40462701099662	0	76%	86%	77%	92%
Portland-Vancouver-Hillsboro, OR-WA MSA	16,816	1.70959520439031	0	3%	6%	4%	11%
Tampa-St. Petersburg-Clearwater, FL MSA	16,456	1.88762596738604	1	30%	52%	23%	65%
Pittsburgh, PA HUD Metro FMR Area	15,739	2.04531618705752	1	11%	31%	6%	51%
Denver-Aurora-Broomfield, CO MSA	15,213	1.49696160550949	0	29%	47%	29%	60%
Newark, NJ HUD Metro FMR Area	14,669	1.43149894644374	0	70%	87%	48%	96%
San Antonio-New Braunfels, TX HUD Metro FMR Area	14,633	1.95623178374825	1	79%	95%	87%	97%
Kansas City, MO-KS HUD Metro FMR Area	14,419	1.65485624396153	0	23%	45%	11%	62%
San Jose-Sunnyvale-Santa Clara, CA HUD Metro FMR Area	14,307	2.13651337027209	1	80%	90%	81%	93%
Columbus, OH HUD Metro FMR Area	13,368	1.56032961956398	0	24%	47%	17%	65%

Table 1 - Percent White/Minority voucher holders in Minority tracts (< 50 % White non-Hispanic White tracts) in selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in White non-Hispanic < 50%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
	2,500	1.55	31				
Fresno, CA MSA	12,846	1.38236634489065	0	80%	95%	90%	96%
Hartford-West Hartford-East Hartford, CT HUD Metro FMR Area	12,831	1.59685924707991	1	42%	67%	28%	79%
Sacramento--Arden-Arcade--Roseville, CA HUD Metro FMR Area	12,672	1.57106483166899	1	43%	65%	39%	80%
Buffalo-Niagara Falls, NY MSA	12,629	1.71971150445434	0	24%	49%	12%	67%
Fort Worth-Arlington, TX HUD Metro FMR Area	12,620	1.60131496329295	1	50%	75%	52%	84%
Phoenix-Mesa-Glendale, AZ MSA	12,471	1.21598326433347	0	40%	58%	46%	71%
Virginia Beach-Norfolk-Newport News, VA-NC HUD Metro FMR Area	12,291	1.69717764068663	1	44%	73%	51%	78%
San Francisco, CA HUD Metro FMR Area	11,876	1.45908394944418	0	55%	75%	73%	81%
Nassau County-Suffolk County, NY Metro Division	11,593	1.90351772113006	1	29%	47%	20%	62%
Bergen-Passaic, NJ HUD Metro FMR Area	11,503	1.57586973139038	1	58%	73%	51%	84%
Oklahoma City, OK HUD Metro FMR Area	11,228	1.62799716950773	0	32%	56%	42%	66%
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL Metro Division	10,486	2.16028871754353	1	63%	89%	71%	93%
Westchester County, NY Statutory Exception Area	10,322	1.52884674983206	0	60%	81%	53%	89%
Charlotte-Gastonia-Rock Hill, NC-SC HUD Metro FMR Area	7,951	1.83730732708871	1	49%	71%	34%	78%
Monmouth-Ocean, NJ HUD Metro FMR Area	7,811	2.32033089836128	1	20%	31%	14%	55%
West Palm Beach-Boca Raton-Delray Beach, FL Metro Division	6,058	1.99696722180763	1	42%	78%	68%	85%
Jacksonville, FL HUD Metro FMR Area	5,872	1.97873843056522	1	29%	66%	41%	71%
Oxnard-Thousand Oaks-Ventura, CA MSA	5,612	1.58262986834582	1	50%	64%	44%	79%
Tacoma-Lakewood, WA Metro Division	5,341	1.55238738101554	1	20%	41%	36%	49%
Jackson, MS HUD Metro FMR Area	4,742	1.84802990481571	1	65%	93%	65%	96%
Urban Honolulu, HI MSA	4,146	1.61942881022266	1	89%	99%	99%	100%
Gary, IN HUD Metro FMR Area	3,305	1.73687974912021	1	47%	79%	26%	86%
Colorado Springs, CO HUD Metro FMR Area	2,957	1.56209918644421	1	17%	32%	26%	41%
North Port-Bradenton-Sarasota, FL MSA	2,592	2.58779402523969	1	16%	42%	25%	53%
Palm Bay-Melbourne-Titusville, FL MSA	2,565	2.14246886711521	1	7%	21%	17%	24%

Table 2 - Percent White/Minority voucher holders in 90% + White non-Hispanic tracts in selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in White non-Hispanic >= 90%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
	2,500	1.55	31				
New York, NY HUD Metro FMR Area	119,362	1.70469679493363	1	2%	4%	20%	0%
Los Angeles-Long Beach-Glendale, CA Metro Division	81,404	1.54468258091556	0	0%	0%	0%	0%
Chicago-Joliet-Naperville, IL HUD Metro FMR Area	62,472	1.78164152922115	1	2%	0%	2%	0%
Boston-Cambridge-Quincy, MA-NH HUD Metro FMR Area	38,514	1.40267028604204	0	12%	6%	12%	2%
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	32,631	1.74746443934000	1	10%	4%	13%	1%
Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area	32,109	1.66467711039899	1	1%	0%	0%	0%
Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area	28,697	1.60743579580320	1	2%	0%	0%	0%
Oakland-Hayward-Berkeley, CA Metro Division	28,355	1.55225007176360	1	0%	0%	0%	0%
Dallas-Plano-Irving, TX Metro Division	28,135	1.54495595712357	1	1%	0%	0%	0%
San Diego-Carlsbad-San Marcos, CA MSA	27,970	1.70769510065996	1	1%	0%	0%	0%
Houston-Baytown-Sugar Land, TX HUD Metro FMR Area	25,906	1.45929140584247	0	0%	0%	0%	0%
Baltimore-Columbia-Towson, MD MSA	23,481	1.44229804079399	0	5%	2%	8%	0%
New Orleans-Metairie-Kenner, LA HUD Metro FMR Area	23,316	1.71802308289835	0	5%	1%	2%	0%
Detroit-Warren-Livonia, MI HUD Metro FMR Area	23,290	1.44616066181301	0	13%	6%	16%	1%
Miami-Miami Beach-Kendall, FL Metro Division	22,689	1.46868637483710	0	0%	0%	0%	0%
Anaheim-Santa Ana-Irvine, CA Metro Division	20,748	1.24741789267425	0	0%	0%	0%	0%
Seattle-Bellevue-Everett, WA Metro Division	20,060	1.60091524647866	0	2%	1%	2%	0%
Cleveland-Elyria-Mentor, OH MSA	19,698	1.38453052837243	0	19%	6%	24%	1%
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	19,479	1.49830024660656	0	15%	4%	6%	1%
St. Louis, MO-IL HUD Metro FMR Area	18,297	1.75231521877068	0	24%	16%	65%	3%
Cincinnati-Middletown, OH-KY-IN HUD Metro FMR Area	17,502	1.54538023702601	0	30%	18%	41%	4%
Riverside-San Bernardino-Ontario, CA MSA	16,858	1.40462701099662	0	0%	0%	0%	0%
Portland-Vancouver-Hillsboro, OR-WA MSA	16,816	1.70959520439031	0	6%	3%	3%	1%
Tampa-St. Petersburg-Clearwater, FL MSA	16,456	1.88762596738604	1	9%	3%	4%	1%
Pittsburgh, PA HUD Metro FMR Area	15,739	2.04531618705752	1	42%	24%	43%	5%
Denver-Aurora-Broomfield, CO MSA	15,213	1.49696160550949	0	4%	1%	0%	0%
Newark, NJ HUD Metro FMR Area	14,669	1.43149894644374	0	2%	1%	6%	0%
San Antonio-New Braunfels, TX HUD Metro FMR Area	14,633	1.95623178374825	1	0%	0%	0%	0%
Kansas City, MO-KS HUD Metro FMR Area	14,419	1.65485624396153	0	12%	8%	18%	1%

Table 2 - Percent White/Minority voucher holders in 90% + White non-Hispanic tracts in selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in White non-Hispanic >= 90%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
	2,500	1.55	31				
San Jose-Sunnyvale-Santa Clara, CA HUD Metro FMR Area	14,307	2.13651337027209	1	0%	0%	0%	0%
Columbus, OH HUD Metro FMR Area	13,368	1.56032961956398	0	18%	17%	44%	3%
Fresno, CA MSA	12,846	1.38236634489065	0	0%	0%	0%	0%
Hartford-West Hartford-East Hartford, CT HUD Metro FMR Area	12,831	1.59685924707991	1	12%	2%	5%	1%
Sacramento--Arden-Arcade--Roseville, CA HUD Metro FMR Area	12,672	1.57106483166899	1	1%	0%	0%	0%
Buffalo-Niagara Falls, NY MSA	12,629	1.71971150445434	0	31%	16%	37%	4%
Fort Worth-Arlington, TX HUD Metro FMR Area	12,620	1.60131496329295	1	1%	0%	0%	0%
Phoenix-Mesa-Glendale, AZ MSA	12,471	1.21598326433347	0	3%	1%	1%	0%
Virginia Beach-Norfolk-Newport News, VA-NC HUD Metro FMR Area	12,291	1.69717764068663	1	3%	0%	3%	0%
San Francisco, CA HUD Metro FMR Area	11,876	1.45908394944418	0	0%	0%	0%	0%
Nassau County-Suffolk County, NY Metro Division	11,593	1.90351772113006	1	10%	5%	9%	2%
Bergen-Passaic, NJ HUD Metro FMR Area	11,503	1.57586973139038	1	0%	0%	0%	0%
Oklahoma City, OK HUD Metro FMR Area	11,228	1.62799716950773	0	0%	0%	0%	0%
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL Metro Division	10,486	2.16028871754353	1	2%	0%	0%	0%
Westchester County, NY Statutory Exception Area	10,322	1.52884674983206	0	1%	0%	0%	0%
Charlotte-Gastonia-Rock Hill, NC-SC HUD Metro FMR Area	7,951	1.83730732708871	1	5%	1%	5%	1%
Monmouth-Ocean, NJ HUD Metro FMR Area	7,811	2.32033089836128	1	21%	15%	21%	2%
West Palm Beach-Boca Raton-Delray Beach, FL Metro Division	6,058	1.99696722180763	1	7%	1%	0%	0%
Jacksonville, FL HUD Metro FMR Area	5,872	1.97873843056522	1	8%	1%	2%	1%
Oxnard-Thousand Oaks-Ventura, CA MSA	5,612	1.58262986834582	1	1%	0%	1%	0%
Tacoma-Lakewood, WA Metro Division	5,341	1.55238738101554	1	4%	0%	0%	0%
Jackson, MS HUD Metro FMR Area	4,742	1.84802990481571	1	1%	0%	0%	0%
Urban Honolulu, HI MSA	4,146	1.61942881022266	1	0%	0%	0%	0%
Gary, IN HUD Metro FMR Area	3,305	1.73687974912021	1	10%	3%	13%	1%
Colorado Springs, CO HUD Metro FMR Area	2,957	1.56209918644421	1	3%	1%	2%	0%
North Port-Bradenton-Sarasota, FL MSA	2,592	2.58779402523969	1	25%	5%	5%	1%
Palm Bay-Melbourne-Titusville, FL MSA	2,565	2.14246886711521	1	11%	1%	0%	0%

Table 3 - U.S. Census Dissimilarity Index White/Black for selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Low Income Areas (VC)	CBSAs with V# >= 2500 VC >= 1.55 SAFMR11 0 >= 0.2	Dissimilarity Index
	2500	1.55	31	
New York, NY HUD Metro FMR Area	119362	1.704696795	1	84.3
Los Angeles-Long Beach-Glendale, CA Metro Division	81404	1.544682581	0	70.5
Chicago-Joliet-Naperville, IL HUD Metro FMR Area	62472	1.781641529	1	83.6
Boston-Cambridge-Quincy, MA-NH HUD Metro FMR Area	38514	1.402670286	0	68.8
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	32631	1.747464439	1	76.9
Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area	32109	1.66467711	1	66.2
Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area	28697	1.607435796	1	68.8
Oakland-Hayward-Berkeley, CA Metro Division	28355	1.552250072	1	66.4
Dallas-Plano-Irving, TX Metro Division	28135	1.544955957	1	64.4
San Diego-Carlsbad-San Marcos, CA MSA	27970	1.707695101	1	58.2
Houston-Baytown-Sugar Land, TX HUD Metro FMR Area	25906	1.459291406	0	71.8
Baltimore-Columbia-Towson, MD MSA	23481	1.442298041	0	71.8
New Orleans-Metairie-Kenner, LA HUD Metro FMR Area	23316	1.718023083	0	74.7
Detroit-Warren-Livonia, MI HUD Metro FMR Area	23290	1.446160662	0	86.7
Miami-Miami Beach-Kendall, FL Metro Division	22689	1.468686375	0	75.8
Anaheim-Santa Ana-Irvine, CA Metro Division	20748	1.247417893	0	
Seattle-Bellevue-Everett, WA Metro Division	20060	1.600915246	0	57.9
Cleveland-Elyria-Mentor, OH MSA	19698	1.384530528	0	79.7
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	19479	1.498300247	0	64.5
St. Louis, MO-IL HUD Metro FMR Area	18297	1.752315219	0	78
Cincinnati-Middleton, OH-KY-IN HUD Metro FMR Area	17502	1.545380237	0	78
Riverside-San Bernardino-Ontario, CA MSA	16858	1.404627011	0	50.1
Portland-Vancouver-Hillsboro, OR-WA MSA	16816	1.709595204	0	55.8
Tampa-St. Petersburg-Clearwater, FL MSA	16456	1.887625967	1	68.4
Pittsburgh, PA HUD Metro FMR Area	15739	2.045316187	1	72.5
Denver-Aurora-Broomfield, CO MSA	15213	1.496961606	0	66.2
Newark, NJ HUD Metro FMR Area	14669	1.431498946	0	83.4
San Antonio-New Braunfels, TX HUD Metro FMR Area	14633	1.956231784	1	55.5
Kansas City, MO-KS HUD Metro FMR Area	14419	1.654856244	0	72.7
San Jose-Sunnyvale-Santa Clara, CA HUD Metro FMR Area	14307	2.13651337	1	45.9
Columbus, OH HUD Metro FMR Area	13368	1.56032962	0	66.9
Fresno, CA MSA	12846	1.382366345	0	58.6
Hartford-West Hartford-East Hartford, CT HUD Metro FMR Area	12831	1.596859247	1	69.5
Sacramento--Arden-Arcade--Roseville, CA HUD Metro FMR Area	12672	1.571064832	1	59.6
Buffalo-Niagara Falls, NY MSA	12629	1.719711504	0	80.4
Fort Worth-Arlington, TX HUD Metro FMR Area	12620	1.601314963	1	64.5
Phoenix-Mesa-Glendale, AZ MSA	12471	1.215983264	0	49.1
Virginia Beach-Norfolk-Newport News, VA-NC HUD Metro FMR Area	12291	1.697177641	1	53
San Francisco, CA HUD Metro FMR Area	11876	1.459083949	0	65.6
Nassau County-Suffolk County, NY Metro Division	11593	1.903517721	1	79
Bergen-Passaic, NJ HUD Metro FMR Area	11503	1.575869731	1	76.8
Oklahoma City, OK HUD Metro FMR Area	11228	1.62799717	0	60.5
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL Metro Division	10486	2.160288718	1	64.8
Westchester County, NY Statutory Exception Area	10322	1.52884675	0	
Charlotte-Gastonia-Rock Hill, NC-SC HUD Metro FMR Area	7951	1.837307327	1	61.1
Monmouth-Ocean, NJ HUD Metro FMR Area	7811	2.320330898	1	68.6

Table 3 - U.S. Census Dissimilarity Index White/Black for selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	CBSAs with V# >= 2500 VC >= 1.55 SAFMR11 0 >= 0.2	Dissimilarity Index
	2500	1.55	31	
West Palm Beach-Boca Raton-Delray Beach, FL Metro Division	6058	1.996967222	1	69.8
Jacksonville, FL HUD Metro FMR Area	5872	1.978738431	1	59.3
Oxnard-Thousand Oaks-Ventura, CA MSA	5612	1.582629868	1	50.3
Tacoma-Lakewood, WA Metro Division	5341	1.552387381	1	51.9
Jackson, MS HUD Metro FMR Area	4742	1.848029905	1	70.6
Urban Honolulu, HI MSA	4146	1.61942881	1	44
Gary, IN HUD Metro FMR Area	3305	1.736879749	1	87.9
Colorado Springs, CO HUD Metro FMR Area	2957	1.562099186	1	46.5
North Port-Bradenton-Sarasota, FL MSA	2592	2.587794025	1	71.9
Palm Bay-Melbourne-Titusville, FL MSA	2565	2.142468867	1	55.2

Table 4 - Gap between Percent White/Minority voucher holders in Minority tracts (< 50 % White non-Hispanic White tracts) in selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in White non-Hispanic < 50%		
				White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers	Number of percentage points Minority Percent minus White percent (Gap)
	2,500	1.55	31			
New York, NY HUD Metro FMR Area	119,362	1.70469679493363	1	30%	94%	65
Los Angeles-Long Beach-Glendale, CA Metro Division	81,404	1.54468258091556	0	58%	97%	39
Chicago-Joliet-Naperville, IL HUD Metro FMR Area	62,472	1.78164152922115	1	41%	91%	49
Boston-Cambridge-Quincy, MA-NH HUD Metro FMR Area	38,514	1.40267028604204	0	28%	68%	39
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	32,631	1.74746443934000	1	23%	78%	55
Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area	32,109	1.66467711039899	1	61%	87%	26
Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area	28,697	1.60743579580320	1	59%	92%	34
Oakland-Hayward-Berkeley, CA Metro Division	28,355	1.55225007176360	1	72%	93%	21
Dallas-Plano-Irving, TX Metro Division	28,135	1.54495595712357	1	73%	91%	18
San Diego-Carlsbad-San Marcos, CA MSA	27,970	1.70769510065996	1	53%	84%	31
Houston-Baytown-Sugar Land, TX HUD Metro FMR Area	25,906	1.45929140584247	0	75%	93%	18
Baltimore-Columbia-Towson, MD MSA	23,481	1.44229804079399	0	34%	77%	44
New Orleans-Metairie-Kenner, LA HUD Metro FMR Area	23,316	1.71802308289835	0	51%	91%	39
Detroit-Warren-Livonia, MI HUD Metro FMR Area	23,290	1.44616066181301	0	19%	75%	56
Miami-Miami Beach-Kendall, FL Metro Division	22,689	1.46868637483710	0	95%	100%	5
Anaheim-Santa Ana-Irvine, CA Metro Division	20,748	1.24741789267425	0	68%	91%	23
Seattle-Bellevue-Everett, WA Metro Division	20,060	1.60091524647866	0	28%	56%	27
Cleveland-Elyria-Mentor, OH MSA	19,698	1.38453052837243	0	17%	76%	59
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	19,479	1.49830024660656	0	18%	47%	29
St. Louis, MO-IL HUD Metro FMR Area	18,297	1.75231521877068	0	10%	75%	66
Cincinnati-Middletown, OH-KY-IN HUD Metro FMR Area	17,502	1.54538023702601	0	9%	62%	53
Riverside-San Bernardino-Ontario, CA MSA	16,858	1.40462701099662	0	77%	92%	15
Portland-Vancouver-Hillsboro, OR-WA MSA	16,816	1.70959520439031	0	4%	11%	7
Tampa-St. Petersburg-Clearwater, FL MSA	16,456	1.88762596738604	1	23%	65%	42
Pittsburgh, PA HUD Metro FMR Area	15,739	2.04531618705752	1	6%	51%	46
Denver-Aurora-Broomfield, CO MSA	15,213	1.49696160550949	0	29%	60%	31
Newark, NJ HUD Metro FMR Area	14,669	1.43149894644374	0	48%	96%	48
San Antonio-New Braunfels, TX HUD Metro FMR Area	14,633	1.95623178374825	1	87%	97%	11
Kansas City, MO-KS HUD Metro FMR Area	14,419	1.65485624396153	0	11%	62%	51

Table 4 - Gap between Percent White/Minority voucher holders in Minority tracts (< 50 % White non-Hispanic White tracts) in selected FMR Areas

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in White non-Hispanic < 50%		
				White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers	Number of percentage points Minority Percent minus White percent (Gap)
	2,500	1.55	31			
San Jose-Sunnyvale-Santa Clara, CA HUD Metro FMR Area	14,307	2.13651337027209	1	81%	93%	12
Columbus, OH HUD Metro FMR Area	13,368	1.56032961956398	0	17%	65%	48
Fresno, CA MSA	12,846	1.38236634489065	0	90%	96%	6
Hartford-West Hartford-East Hartford, CT HUD Metro FMR Area	12,831	1.59685924707991	1	28%	79%	51
Sacramento--Arden-Arcade--Roseville, CA HUD Metro FMR Area	12,672	1.57106483166899	1	39%	80%	41
Buffalo-Niagara Falls, NY MSA	12,629	1.71971150445434	0	12%	67%	55
Fort Worth-Arlington, TX HUD Metro FMR Area	12,620	1.60131496329295	1	52%	84%	31
Phoenix-Mesa-Glendale, AZ MSA	12,471	1.21598326433347	0	46%	71%	25
Virginia Beach-Norfolk-Newport News, VA-NC HUD Metro FMR Area	12,291	1.69717764068663	1	51%	78%	27
San Francisco, CA HUD Metro FMR Area	11,876	1.45908394944418	0	73%	81%	7
Nassau County-Suffolk County, NY Metro Division	11,593	1.90351772113006	1	20%	62%	42
Bergen-Passaic, NJ HUD Metro FMR Area	11,503	1.57586973139038	1	51%	84%	33
Oklahoma City, OK HUD Metro FMR Area	11,228	1.62799716950773	0	42%	66%	24
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL Metro Division	10,486	2.16028871754353	1	71%	93%	22
Westchester County, NY Statutory Exception Area	10,322	1.52884674983206	0	53%	89%	36
Charlotte-Gastonia-Rock Hill, NC-SC HUD Metro FMR Area	7,951	1.83730732708871	1	34%	78%	44
Monmouth-Ocean, NJ HUD Metro FMR Area	7,811	2.32033089836128	1	14%	55%	40
West Palm Beach-Boca Raton-Delray Beach, FL Metro Division	6,058	1.99696722180763	1	68%	85%	17
Jacksonville, FL HUD Metro FMR Area	5,872	1.97873843056522	1	41%	71%	30
Oxnard-Thousand Oaks-Ventura, CA MSA	5,612	1.58262986834582	1	44%	79%	35
Tacoma-Lakewood, WA Metro Division	5,341	1.55238738101554	1	36%	49%	13
Jackson, MS HUD Metro FMR Area	4,742	1.84802990481571	1	65%	96%	31
Urban Honolulu, HI MSA	4,146	1.61942881022266	1	99%	100%	1
Gary, IN HUD Metro FMR Area	3,305	1.73687974912021	1	26%	86%	60
Colorado Springs, CO HUD Metro FMR Area	2,957	1.56209918644421	1	26%	41%	15
North Port-Bradenton-Sarasota, FL MSA	2,592	2.58779402523969	1	25%	53%	29
Palm Bay-Melbourne-Titusville, FL MSA	2,565	2.14246886711521	1	17%	24%	6

Table 5 - Percent White non-Hispanic and Percent Minority vouchers in tracts with poverty = > 25%

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in Poverty >= 25%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
New York, NY HUD Metro FMR Area	119,362	1.70469679493363	1	38%	66%	53%	71%
Los Angeles-Long Beach-Glendale, CA Metro Division	81,404	1.54468258091556	0	35%	54%	38%	60%
Chicago-Joliet-Naperville, IL HUD Metro FMR Area	62,472	1.78164152922115	1	27%	52%	10%	58%
Boston-Cambridge-Quincy, MA-NH HUD Metro FMR Area	38,514	1.40267028604204	0	24%	34%	20%	44%
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	32,631	1.74746443934973	1	27%	49%	17%	59%
Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area	32,109	1.66467711039899	1	8%	20%	4%	24%
Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area	28,697	1.60743579580320	1	33%	55%	34%	58%
Oakland-Hayward-Berkeley, CA Metro Division	28,355	1.55225007176360	1	20%	33%	17%	36%
Dallas-Plano-Irving, TX Metro Division	28,135	1.54495595712357	1	29%	44%	38%	46%
San Diego-Carlsbad-San Marcos, CA MSA	27,970	1.70769510065996	1	21%	37%	31%	41%
Houston-Baytown-Sugar Land, TX HUD Metro FMR Area	25,906	1.45929140584247	0	34%	47%	42%	49%
Baltimore-Columbia-Towson, MD MSA	23,481	1.44229804079399	0	20%	30%	13%	35%
New Orleans-Metairie-Kenner, LA HUD Metro FMR Area	23,316	1.71802308289835	0	40%	73%	45%	75%
Detroit-Warren-Livonia, MI HUD Metro FMR Area	23,290	1.44616066181301	0	40%	63%	46%	70%
Miami-Miami Beach-Kendall, FL Metro Division	22,689	1.46868637483710	0	44%	65%	66%	67%
Anaheim-Santa Ana-Irvine, CA Metro Division	20,748	1.24741789267425	0	17%	22%	19%	25%
Seattle-Bellevue-Everett, WA Metro Division	20,060	1.60091524647866	0	15%	28%	26%	30%
Cleveland-Elyria-Mentor, OH MSA	19,698	1.38453052837243	0	37%	56%	36%	62%
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	19,479	1.49830024660656	0	20%	31%	18%	40%
St. Louis, MO-IL HUD Metro FMR Area	18,297	1.75231521877068	0	26%	50%	12%	61%
Cincinnati-Middleton, OH-KY-IN HUD Metro FMR Area	17,502	1.54538023702601	0	33%	52%	35%	62%
Riverside-San Bernardino-Ontario, CA MSA	16,858	1.40462701099662	0	34%	46%	40%	51%
Portland-Vancouver-Hillsboro, OR-WA MSA	16,816	1.70959520439031	0	18%	33%	31%	40%
Tampa-St. Petersburg-Clearwater, FL MSA	16,456	1.88762596738604	1	24%	48%	34%	56%
Pittsburgh, PA HUD Metro FMR Area	15,739	2.04531618705752	1	23%	45%	35%	56%
Denver-Aurora-Broomfield, CO MSA	15,213	1.49696160550949	0	19%	32%	23%	39%
Newark, NJ HUD Metro FMR Area	14,669	1.43149894644374	0	27%	41%	10%	48%
San Antonio-New Braunfels, TX HUD Metro FMR Area	14,633	1.95623178374825	1	28%	54%	40%	57%
Kansas City, MO-KS HUD Metro FMR Area	14,419	1.65485624396153	0	24%	38%	19%	47%
San Jose-Sunnyvale-Santa Clara, CA HUD Metro FMR Area	14,307	2.13651337027209	1	8%	13%	8%	15%

Table 5 - Percent White non-Hispanic and Percent Minority vouchers in tracts with poverty = > 25%

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in Poverty >= 25%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
Columbus, OH HUD Metro FMR Area	13,368	1.56032961956398	0	35%	56%	41%	65%
Fresno, CA MSA	12,846	1.38236634489065	0	63%	83%	76%	85%
Hartford-West Hartford-East Hartford, CT HUD Metro FMR Area	12,831	1.59685924707991	1	28%	47%	18%	56%
Sacramento--Arden-Arcade--Roseville, CA HUD Metro FMR Area	12,672	1.57106483166899	1	28%	43%	34%	50%
Buffalo-Niagara Falls, NY MSA	12,629	1.71971150445434	0	36%	59%	31%	74%
Fort Worth-Arlington, TX HUD Metro FMR Area	12,620	1.60131496329295	1	26%	41%	32%	45%
Phoenix-Mesa-Glendale, AZ MSA	12,471	1.21598326433347	0	34%	46%	48%	50%
Virginia Beach-Norfolk-Newport News, VA-NC HUD Metro FMR Area	12,291	1.69717764068663	1	16%	27%	15%	29%
San Francisco, CA HUD Metro FMR Area	11,876	1.45908394944418	0	11%	16%	18%	16%
Nassau County-Suffolk County, NY Metro Division	11,593	1.90351772113006	1	4%	9%	2%	12%
Bergen-Passaic, NJ HUD Metro FMR Area	11,503	1.57586973139038	1	17%	32%	10%	42%
Oklahoma City, OK HUD Metro FMR Area	11,228	1.62799716950773	0	35%	57%	52%	63%
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL Metro Division	10,486	2.16028871754353	1	22%	47%	31%	50%
Westchester County, NY Statutory Exception Area	10,322	1.52884674983206	0	16%	30%	9%	35%
Charlotte-Gastonia-Rock Hill, NC-SC HUD Metro FMR Area	7,951	1.83730732708871	1	31%	53%	42%	57%
Monmouth-Ocean, NJ HUD Metro FMR Area	7,811	2.32033089836128	1	15%	40%	49%	33%
West Palm Beach-Boca Raton-Delray Beach, FL Metro Division	6,058	1.99696722180763	1	26%	54%	46%	59%
Jacksonville, FL HUD Metro FMR Area	5,872	1.97873843056522	1	21%	47%	30%	51%
Oxnard-Thousand Oaks-Ventura, CA MSA	5,612	1.58262986834582	1	8%	14%	6%	20%
Tacoma-Lakewood, WA Metro Division	5,341	1.55238738101554	1	16%	31%	29%	35%
Jackson, MS HUD Metro FMR Area	4,742	1.84802990481571	1	37%	70%	35%	72%
Urban Honolulu, HI MSA	4,146	1.61942881022266	1	5%	10%	15%	10%
Gary, IN HUD Metro FMR Area	3,305	1.73687974912021	1	38%	61%	18%	67%
Colorado Springs, CO HUD Metro FMR Area	2,957	1.56209918644421	1	19%	32%	34%	34%
North Port-Bradenton-Sarasota, FL MSA	2,592	2.58779402523969	1	19%	47%	36%	58%
Palm Bay-Melbourne-Titusville, FL MSA	2,565	2.14246886711521	1	21%	49%	39%	54%

Table 6 -Percent White non-Hispanic and Percent Minority vouchers in tracts with poverty <= 10%

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in Poverty < 10%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
	2,500	1.55	31				
New York, NY HUD Metro FMR Area	119,362	1.70469679493363	1	21%	5%	8%	3%
Los Angeles-Long Beach-Glendale, CA Metro Division	81,404	1.54468258091556	0	20%	8%	11%	6%
Chicago-Joliet-Naperville, IL HUD Metro FMR Area	62,472	1.78164152922115	1	30%	13%	33%	9%
Boston-Cambridge-Quincy, MA-NH HUD Metro FMR Area	38,514	1.40267028604204	0	35%	22%	34%	13%
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	32,631	1.74746443934973	1	39%	18%	42%	10%
Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area	32,109	1.66467711039899	1	52%	38%	55%	32%
Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area	28,697	1.60743579580320	1	24%	7%	15%	6%
Oakland-Hayward-Berkeley, CA Metro Division	28,355	1.55225007176360	1	37%	21%	35%	17%
Dallas-Plano-Irving, TX Metro Division	28,135	1.54495595712357	1	31%	13%	16%	10%
San Diego-Carlsbad-San Marcos, CA MSA	27,970	1.70769510065996	1	26%	12%	14%	9%
Houston-Baytown-Sugar Land, TX HUD Metro FMR Area	25,906	1.45929140584247	0	25%	7%	5%	6%
Baltimore-Columbia-Towson, MD MSA	23,481	1.44229804079399	0	43%	27%	44%	22%
New Orleans-Metairie-Kenner, LA HUD Metro FMR Area	23,316	1.71802308289835	0	18%	3%	6%	2%
Detroit-Warren-Livonia, MI HUD Metro FMR Area	23,290	1.44616066181301	0	25%	7%	11%	3%
Miami-Miami Beach-Kendall, FL Metro Division	22,689	1.46868637483710	0	11%	3%	4%	2%
Anaheim-Santa Ana-Irvine, CA Metro Division	20,748	1.24741789267425	0	37%	18%	29%	12%
Seattle-Bellevue-Everett, WA Metro Division	20,060	1.60091524647866	0	42%	22%	24%	16%
Cleveland-Elyria-Mentor, OH MSA	19,698	1.38453052837243	0	28%	11%	21%	6%
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	19,479	1.49830024660656	0	43%	29%	36%	21%
St. Louis, MO-IL HUD Metro FMR Area	18,297	1.75231521877068	0	32%	13%	26%	8%
Cincinnati-Middleton, OH-KY-IN HUD Metro FMR Area	17,502	1.54538023702601	0	29%	11%	17%	6%
Riverside-San Bernardino-Ontario, CA MSA	16,858	1.40462701099662	0	22%	9%	11%	7%
Portland-Vancouver-Hillsboro, OR-WA MSA	16,816	1.70959520439031	0	26%	10%	9%	6%
Tampa-St. Petersburg-Clearwater, FL MSA	16,456	1.88762596738604	1	26%	7%	8%	4%
Pittsburgh, PA HUD Metro FMR Area	15,739	2.04531618705752	1	34%	13%	17%	4%
Denver-Aurora-Broomfield, CO MSA	15,213	1.49696160550949	0	35%	19%	18%	15%
Newark, NJ HUD Metro FMR Area	14,669	1.43149894644374	0	36%	18%	53%	9%
San Antonio-New Braunfels, TX HUD Metro FMR Area	14,633	1.95623178374825	1	23%	6%	11%	4%
Kansas City, MO-KS HUD Metro FMR Area	14,419	1.65485624396153	0	36%	17%	23%	11%

Table 6 -Percent White non-Hispanic and Percent Minority vouchers in tracts with poverty <= 10%

HMFA Name	Voucher Count (V#)	Voucher Concentration in Concentrated Low Income Areas (VC)	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Percent in Poverty < 10%			
				Total Renter Occupied Units	Total Picture 2015 Vouchers	White non-Hispanic Total Picture 2015 Vouchers	Minority Total Picture 2015 Vouchers
	2,500	1.55	31				
San Jose-Sunnyvale-Santa Clara, CA HUD Metro FMR Area	14,307	2.13651337027209	1	56%	33%	36%	31%
Columbus, OH HUD Metro FMR Area	13,368	1.56032961956398	0	29%	8%	11%	5%
Fresno, CA MSA	12,846	1.38236634489065	0	11%	1%	1%	1%
Hartford-West Hartford-East Hartford, CT HUD Metro FMR Area	12,831	1.59685924707991	1	39%	17%	34%	11%
Sacramento--Arden-Arcade--Roseville, CA HUD Metro FMR Area	12,672	1.57106483166899	1	24%	10%	12%	6%
Buffalo-Niagara Falls, NY MSA	12,629	1.71971150445434	0	29%	10%	20%	3%
Fort Worth-Arlington, TX HUD Metro FMR Area	12,620	1.60131496329295	1	29%	11%	14%	8%
Phoenix-Mesa-Glendale, AZ MSA	12,471	1.21598326433347	0	28%	13%	10%	10%
Virginia Beach-Norfolk-Newport News, VA-NC HUD Metro FMR Area	12,291	1.69717764068663	1	34%	16%	22%	14%
San Francisco, CA HUD Metro FMR Area	11,876	1.45908394944418	0	49%	35%	34%	34%
Nassau County-Suffolk County, NY Metro Division	11,593	1.90351772113006	1	69%	49%	65%	38%
Bergen-Passaic, NJ HUD Metro FMR Area	11,503	1.57586973139038	1	39%	25%	44%	15%
Oklahoma City, OK HUD Metro FMR Area	11,228	1.62799716950773	0	23%	8%	11%	4%
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL Metro Division	10,486	2.16028871754353	1	23%	7%	5%	5%
Westchester County, NY Statutory Exception Area	10,322	1.52884674983206	0	43%	24%	51%	17%
Charlotte-Gastonia-Rock Hill, NC-SC HUD Metro FMR Area	7,951	1.83730732708871	1	28%	9%	9%	7%
Monmouth-Ocean, NJ HUD Metro FMR Area	7,811	2.32033089836128	1	55%	29%	24%	29%
West Palm Beach-Boca Raton-Delray Beach, FL Metro Division	6,058	1.99696722180763	1	29%	10%	10%	8%
Jacksonville, FL HUD Metro FMR Area	5,872	1.97873843056522	1	28%	8%	14%	5%
Oxnard-Thousand Oaks-Ventura, CA MSA	5,612	1.58262986834582	1	41%	23%	30%	15%
Tacoma-Lakewood, WA Metro Division	5,341	1.55238738101554	1	36%	14%	14%	9%
Jackson, MS HUD Metro FMR Area	4,742	1.84802990481571	1	19%	3%	3%	2%
Urban Honolulu, HI MSA	4,146	1.61942881022266	1	50%	30%	27%	27%
Gary, IN HUD Metro FMR Area	3,305	1.73687974912021	1	25%	5%	10%	3%
Colorado Springs, CO HUD Metro FMR Area	2,957	1.56209918644421	1	32%	15%	11%	12%
North Port-Bradenton-Sarasota, FL MSA	2,592	2.58779402523969	1	34%	9%	14%	2%
Palm Bay-Melbourne-Titusville, FL MSA	2,565	2.14246886711521	1	31%	13%	16%	10%

Table 7 - Equivalent Gaps in number of percentage points in voucher and renter ratio cause substantial difference in concentration ratio

FMR Areaname	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Vouchers in CLIA / All Vouchers	Renter Units in CLIA / All Renter Units	Gap by number of percentage points voucher ratio minus renter ratio	concentration ratio
Nassau County-Suffolk County, NY Metro Division	1	12.5%	6.6%	5.94	1.9035
Phoenix-Mesa-Glendale, AZ MSA	0	36.5%	30.0%	6.47	1.2160
Tacoma-Lakewood, WA Metro Division	1	23.4%	15.1%	8.34	1.5524
Fresno, CA MSA	0	34.2%	24.7%	9.45	1.3824
Oxnard-Thousand Oaks-Ventura, CA MSA	1	26.0%	16.4%	9.56	1.5826
Virginia Beach-Norfolk-Newport News, VA-NC HUD Metro FMR Area	1	24.2%	14.2%	9.93	1.6972
Boston-Cambridge-Quincy, MA-NH HUD Metro FMR Area	0	37.5%	26.7%	10.76	1.4027
San Francisco, CA HUD Metro FMR Area	0	35.6%	24.4%	11.19	1.4591
Seattle-Bellevue-Everett, WA Metro Division	0	30.1%	18.8%	11.31	1.6009
Riverside-San Bernardino-Ontario, CA MSA	0	39.8%	28.3%	11.47	1.4046
Bergen-Passaic, NJ HUD Metro FMR Area	1	32.9%	20.9%	12.04	1.5759
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	0	37.4%	25.0%	12.44	1.4983
Newark, NJ HUD Metro FMR Area	0	42.8%	29.9%	12.90	1.4315
Colorado Springs, CO HUD Metro FMR Area	1	36.7%	23.5%	13.20	1.5621
Baltimore-Columbia-Towson, MD MSA	0	43.8%	30.4%	13.44	1.4423
Urban Honolulu, HI MSA	1	36.5%	22.5%	13.95	1.6194
Washington-Arlington-Alexandria, DC-VA-MD HUD Metro FMR Area	1	35.4%	21.3%	14.14	1.6647
Cleveland-Elyria-Mentor, OH MSA	0	51.0%	36.9%	14.17	1.3845
Houston-Baytown-Sugar Land, TX HUD Metro FMR Area	0	45.1%	30.9%	14.21	1.4593
Sacramento--Arden-Arcade--Roseville, CA HUD Metro FMR Area	1	40.0%	25.4%	14.52	1.5711
Fort Worth-Arlington, TX HUD Metro FMR Area	1	39.0%	24.3%	14.63	1.6013
Portland-Vancouver-Hillsboro, OR-WA MSA	0	35.8%	20.9%	14.84	1.7096
Detroit-Warren-Livonia, MI HUD Metro FMR Area	0	49.0%	33.9%	15.11	1.4462
Denver-Aurora-Broomfield, CO MSA	0	45.7%	30.5%	15.17	1.4970
Palm Bay-Melbourne-Titusville, FL MSA	1	28.6%	13.4%	15.26	2.1425

Table 7 - Equivalent Gaps in number of percentage points in voucher and renter ratio cause substantial difference in concentration ratio

FMR Areaname	If "1", then designated for SAFMR, if "0", 10,000 or more vouchers and not designated	Vouchers in CLIA / All Vouchers	Renter Units in CLIA / All Renter Units	Gap by number of percentage points voucher ratio minus renter ratio	concentration ratio
Oakland-Hayward-Berkeley, CA Metro Division	1	43.0%	27.7%	15.30	1.5523
Kansas City, MO-KS HUD Metro FMR Area	0	38.9%	23.5%	15.38	1.6549
Los Angeles-Long Beach-Glendale, CA Metro Division	0	45.3%	29.3%	15.97	1.5447
Atlanta-Sandy Springs-Marietta, GA HUD Metro FMR Area	1	43.7%	27.2%	16.53	1.6074
Dallas-Plano-Irving, TX Metro Division	1	47.1%	30.5%	16.60	1.5450
Westchester County, NY Statutory Exception Area	0	50.9%	33.3%	17.62	1.5288
Cincinnati-Middleton, OH-KY-IN HUD Metro FMR Area	0	50.5%	32.7%	17.83	1.5454
San Diego-Carlsbad-San Marcos, CA MSA	1	45.8%	26.8%	18.97	1.7077
Miami-Miami Beach-Kendall, FL Metro Division	0	61.0%	41.5%	19.46	1.4687
San Jose-Sunnyvale-Santa Clara, CA HUD Metro FMR Area	1	37.2%	17.4%	19.81	2.1365
Tampa-St. Petersburg-Clearwater, FL MSA	1	42.1%	22.3%	19.82	1.8876