

Addressing Equity & Opportunity:

The Regional Fair Housing and Equity Assessment (FHEA) Grant Obligation





Webinar Overview

1. Rationale for FHEA
2. Overview of FHEA Grant Obligation
 - FHEA Context
 - Discussion of FHEA Components
 - FHEA Caveats and Uniqueness
 - Organization of the Product
3. Next Steps



Rationale

Sustainability also means creating "geographies of opportunity," places that effectively connect people to jobs, quality public schools, and other amenities. Today, too many HUD-assisted families are stuck in neighborhoods of concentrated poverty and segregation, where one's zip code predicts poor education, employment, and even health outcomes. These neighborhoods are not sustainable in their present state.

—HUD Secretary Shaun Donovan, February 23, 2010



Regional FHEA Grant Obligation Objectives:

What We Expect of You

1. **Understand** the historical, current and future context for equity and opportunity in the region and the data and evidence that demonstrates those dynamics
2. **Engage** regional leaders and stakeholders on findings and implications of analysis
3. **Integrate** knowledge developed through the Regional FHEA exercise into the strategy development process (e.g., priority setting and decision making)

Regional Fair Housing and Equity Assessment (FHEA) Grant Obligation Overview



FHEA Context

- The Fair Housing Act requires HUD and its grantees to do more than just combat discrimination
- The FHEA concept emerges from the linkage of two distinct strands intended to more effectively promote inclusive, sustainable regions
 - Regional is better than local for certain decisions
 - Refined thinking regarding fair housing is starting to inform policy
- The FHEA structure represents the marrying of these two
 - 5 dimensions: 3 are informed by the refined thinking, the other 2 explore regional issues



Components of the Regional FHEA

Identification and Assessment of:

- Segregated Areas and Areas of Increasing Diversity and/or Racial/Ethnic Integration
- Racially/Ethnically Concentrated Areas of Poverty
- Access to Existing Areas of High Opportunity
- Major Public Investments
- Fair Housing Issues, Services, and Activities



Regional FHEA: Segregation and Integration

Section I: Identification and Assessment of Racial/Ethnic Segregation and Integration

- Overview: Why we are looking at racial and ethnic segregation and integration
- Sample Questions
 - Is your region segregated? What are possible drivers?
 - Are particular racial/ethnic minorities more segregated than others?
 - Are particular jurisdictions far below their predicted racial/ethnic population based on their current economic profile?
 - Are certain areas integrated or in the process of integrating? What are the drivers?
 - What do the demographic trends over time reveal regarding segregation and integration?



Regional FHEA – Quick Note About Data

- Data Notes
 - *HUD will be making the data used in this presentation available to all OSHC grantees*

- Data Geographies
 - **Metropolitan/Micropolitan Areas:** Data in this presentation is provided at the metropolitan/micropolitan area-level using OMB's Core-Based Statistical Area definition:

Metropolitan Statistical Areas have at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties. Micropolitan Statistical Areas – a new set of statistical areas – have at least one urban cluster of at least 10,000 but less than 50,000 population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties. Metropolitan and Micropolitan Statistical Areas are defined in terms of whole counties.

- **Census Tract:** Small, relatively permanent statistical subdivisions of a county or statistically equivalent entity have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

[<http://www.census.gov/geo/www/tiger/glossry2.pdf>]



Regional FHEA – Assessment of Racial/Ethnic Segregation

- Analytical Tools

- Dissimilarity Index

- Metro/Micro level statistic that builds up from tract-level (“neighborhood level”) data
 - Used to summarize segregation or integration of two groups (e.g. Black, White)
 - Index can take on a value from zero (0) to one (1), with zero representing complete integration and one representing complete segregation
 - Can be loosely interpreted as the percentage of one group that would need to move in order for each tract to match the composition of the area

- Predicted Racial/Ethnic Composition

- Jurisdiction level statistic derived from regional demographic and economic characteristics of the Metro/Micro Area
 - Answers question: given the current household income characteristics for each jurisdiction, what would we expect the racial/ethnic composition to look like?



Segregation – Dissimilarity Indices

Racial Segregation	
Metro/Micro - Dissimilarity Indices	
Chicago-Naperville-Joliet, IL-IN-WI Metro Area	
	Score
Non-White - White	0.57
Black - White	0.79
Hispanic - White	0.59
Asian - White	0.51

Racial Segregation	
Metro/Micro - Dissimilarity Indices	
Asheville, NC Metro Area	
	Score
Non-White - White	0.41
Black - White	0.58
Hispanic - White	0.51
Asian - White	N/A

Racial Segregation	
Dissimilarity Indices	
Low	
Moderate	
High	



See Segregation Maps



Regional FHEA: RCAP

- Section II: Identification and Assessment of Racially Concentrated Areas of Poverty (RCAP)
 - Overview: Why we care about RCAPs
 - Sample Questions
 - Does your region contain racially concentrated areas of poverty? If so, what percentage of the regional population resides in RCAPs?
 - Are particular racial/ethnic minorities acutely concentrated in RCAPs?
 - Do certain jurisdictions harbor the majority of the regions RCAPs?
 - How much HUD/assisted housing/LIHTC is in each RCAP?



Regional FHEA: ID & Assessment of Racially Concentrated Areas of Poverty (RCAP)

- Analytical Tools :
 - Uses census tract characteristics to define “racially-concentrated area of poverty”
 - HUD defines RCAP as a census tract with
 - A family poverty rate $\geq 40\%$ or
 - A family poverty rate $\geq 300\%$ of the metro tract average* (whichever is lower)
 - AND a majority non-white population ($>50\%$)
 - Examines relative concentration of particular racial/ethnic groups in these “RCAP census tracts”



Case 1: RCAP in Chicago

Racially Concentrated Areas of Poverty			
Metro/Micro			
Chicago-Naperville-Joliet, IL-IN-WI Metro Area			
	Count	Percent	
Total Tracts	4053	100%	
RCAP Tracts	253	19%	
Non RCAP Tracts	3800	83%	
	Count	% of Group in Percent	Percentile Rank
Total Population in RCAP	594,076	6.28%	88
Black in RCAP Tracts	399,626	24.08%	91
Hispanic in RCAP Tracts	131,449	7.25%	82
Asian in RCAP Tracts	13,162	2.70%	86



Case 2: RCAP in Asheville

Racially Concentrated Areas of Poverty			
Metro/Micro			
Asheville, NC Metro Area			
	Count	Percent	
Total Tracts	312	100%	
RCAP Tracts	3	19%	
Non RCAP Tracts	309	83%	
	Count	% of Group in Percent	Percentile Rank
Total Population in RCAP	4,762	1.18%	63
Black in RCAP Tracts	2,592	13.16%	80
Hispanic in RCAP Tracts	455	2.33%	70
Asian in RCAP Tracts	0	0.00%	1



See RCAP Maps



Regional FHEA: Equal Access to Opportunity

Section III: Identification and Assessment of Disparity in Access to Opportunity

- Overview: Why we care about disparity in access to opportunity
- Sample Questions
 - Where are the areas of high opportunity? What proportion of the region's residents live in such areas?
 - Are there disparities of neighborhood opportunity for racial/ethnic minorities? Are they significant?
 - Are certain elements of opportunity more inequitably located across groups?
 - How do these inequities (or lack of) align with your public investments?



Regional FHEA: Disparity in Access to Opportunity

- Analytical Tools
 - Indices
 - Indices can be calculated many different ways
 - HUD created five indices School Proficiency Index, Poverty Index, Labor Market Index, Housing Stability Index, Job Access Index
 - Other applications: Crime? Health?
 - Exposure Indices
 - Metro-level Statistic built from census tract data
 - Interpreted as “the average neighborhood that a given group is “exposed to”
 - Disparity Comparison
 - Compare the differences in exposure indices across racial/ethnic groups
 - Use statistical tests to validate the accuracy of the disparity



Asheville Opportunity

Metro Asheville, NC Metro Area

Dimension	All Persons	Poor Persons	Persons in Voucher households	Persons in PH	White Persons	Black Persons	Hispanic Persons	Asian Persons	
School Index	7.60	7.29	7.35	7.00	7.66	6.98	7.24	7.81	
Poverty Index	4.95	3.66	3.84	2.14	5.12	3.39	3.66	5.32	
Labor Engagement Index	5.72	5.13	4.90	4.19	5.75	5.56	5.03	6.96	
Housing Stability Index	5.98	5.16	5.18	2.98	6.08	4.94	5.21	6.52	
Job Accessibility Index	4.97	5.47	5.56	8.30	4.78	7.41	5.64	5.99	
Opportunity Index	6.01	5.01	5.06	3.89	6.08	5.60	5.06	7.23	
	Poor Persons	Poor White	Poor Black	Poor Hispanic	Poor Asian		Disparity Black-White	Disparity Hispanic-White	Disparity Asian-White
School Index	7.29	7.44	6.34	7.13	7.41		1.10	0.30	0.03
Poverty Index	3.66	4.04	2.22	2.47	3.45		1.81	1.57	0.58
Labor Engagement Index	5.13	5.20	4.69	4.89	5.79		0.51	0.31	-0.60
Housing Stability Index	5.16	5.35	3.99	4.68	5.82		1.36	0.66	-0.48
Job Accessibility Index	5.47	5.07	7.93	5.63	7.29		-2.86	-0.56	-2.22
Opportunity Index	5.01	5.17	4.28	4.37	6.04		0.89	0.80	-0.87



Chicago Opportunity

Metro Chicago-Naperville-Joliet, IL-IN-WI Metro Area

Dimension	All Persons	Poor Persons	Persons in Voucher households	Persons in PH	White Persons	Black Persons	Hispanic Persons	Asian Persons	
School Index	5.88	3.86	3.15	2.78	7.29	2.94	4.13	6.98	
Poverty Index	5.25	3.15	2.91	2.14	6.35	2.87	4.03	5.87	
Labor Engagement Index	5.60	3.86	3.17	3.39	6.71	2.94	4.34	7.19	
Housing Stability Index	5.59	3.59	2.93	3.07	7.04	2.75	3.69	6.35	
Job Accessibility Index	5.52	5.38	4.70	5.53	5.58	4.76	5.79	6.33	
Opportunity Index	5.61	3.47	2.74	2.63	7.02	2.57	3.87	6.93	
	Poor Persons	Poor White	Poor Black	Poor Hispanic	Poor Asian		Disparity Black- White	Disparity Hispanic- White	Disparity Asian- White
School Index	3.86	6.19	2.32	3.37	6.06		3.87	2.82	0.13
Poverty Index	3.15	4.91	1.94	2.94	4.28		2.97	1.96	0.63
Labor Engagement Index	3.86	5.75	2.33	3.80	6.09		3.42	1.94	-0.34
Housing Stability Index	3.59	5.86	2.24	2.97	5.22		3.63	2.90	0.64
Job Accessibility Index	5.38	5.88	4.57	5.82	6.57		1.31	0.06	-0.69
Opportunity Index	3.47	5.73	1.94	3.04	5.55		3.78	2.69	0.18



See Opportunity Maps



Regional FHEA: Major Public Investments

Section IV: Identification and Assessment of public investment triggers that impact access to opportunity and demographic changes

- Overview: Why we care about public investments
- Sample Questions
 - What major public investments (e.g., transportation, economic development) are slated for the region, and where? Are they reflected in current plans (e.g., long range transportation plan, CEDS plan)? Will these investments affect any communities of racially concentrated poverty (RCAP)? Areas of high opportunity? Diversifying/integrating communities?
 - What is the likely or projected impact of those investments on the affected places and the current residents of those places (positive/negative impact; adverse/unintended consequences; disruptive/revitalizing, etc.)?



Regional FHEA: Fair Housing Issues, Services, Activities

Section V: Identification and Assessment of the existing fair housing issues, services, and activities

- Overview: Why we care about fair housing infrastructure
- Sample Questions
 - How is the region faring in complying with the Fair Housing Act i.e., the state of housing discrimination in the region? What data/evidence is most probative of your assessment (e.g., volume and kind of complaints)?
 - What is the state of play with fair housing capacity in the region (e.g., # and quality of fair housing education and advocacy organizations, jurisdictional capacity to monitor and enforce, etc.)?
 - Does your data/evidence related to fair housing compliance suggest a systemic issue that requires a systemic, public policy response (e.g., patterns of discriminatory practice, common bad actors, ineffective support systems, etc.)? Given the systemic issues, what is the strategy to address?



Regional FHEA Grant Obligation Caveats

While this guidance has been informed by the ongoing policy development conversations at HUD related to equity and opportunity issues, it is important to distinguish it in the following ways:

1. FHEA is **NOT** a revision of the Analysis of Impediments standard and obligation
2. FHEA can help inform, but does **NOT**, on its face, count for the Analysis of Impediments obligation that jurisdictions currently have



What Makes the FHEA Unique

- **Analysis**: Scope and scale of analysis is to be performed at a regional scale and includes data elements that are consistent with the Livability Principles
- **Engagement**: data analysis and baseline assessment summarized in the Regional FHEA is intended to help focus and inform consortia deliberations
- **Data sources**: HUD will provide a consistent, baseline data packet that describes thresholds for comparison within and across jurisdictions within each region. Regions can supplement this data
- **Bridge**: This product should be completed in time to serve as a living document that informs the development of the regional plan



Organization of the Product

There are **eight** expected headers within your document

1. Executive Summary
2. ID and Assessment of Areas of Racial/Ethnic Segregation as well as Integration
3. ID and Assessment of Racially Concentrated Areas of Poverty
4. ID and Assessment of Access to existing areas of high opportunity
5. ID and Assessment of Major Public Investments (current and future)
6. ID and Assessment of Fair Housing issues, services, and activities
7. Conclusions regarding findings from the identification and assessment phases and recommendations to be implemented through regional planning.
8. Major takeaways from stakeholder engagement related to the findings of the FHEA
9. Lessons learned (optional)



Next Steps

Fulfilling the Grant Obligation:

- Talk to your GTR about questions and comments you have on how to incorporate this guidance into your work
- Be on the lookout for more guidance, data resources and capacity building training

Opt-In Option – *Going Beyond Grant Obligation:*

- While the work created here will only satisfy your Regional Planning Grant obligations, our hope is that you can use this work as a basis for fulfilling other federal requirements.
- If you are interested in opting in to have this analysis count for other requirements, please let your GTR know. Your GTR will follow up with specific information about the next steps for the “opt-in” and what additional work may be necessary.