

City of Lubbock
Analysis of Impediments to
Fair Housing
2018



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I. Executive Summary

1. **Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.**

City Background: The City of Lubbock is located in northwest Texas with a population of 253,888 as of the 2017. It is the 11th largest city in the State of Texas. It was founded in 1867, and is governed by a council-manager form of government, with all governmental powers resting in city council. Residents elect six council members, one for each of Lubbock's six districts, for terms of four years, and a mayor who serves a two-year term. Lubbock is a racially diverse city with nearly half of the population being non-white. Over 30% of the population is Hispanic, which makes efforts at outreach to Limited English Proficiency (LEP) populations essential in ensuring fair housing choice. Lubbock is home to Texas Tech University, which reached an undergraduate enrollment of over 30,000 in the fall of 2017. Lubbock has recently experienced significant growth through the southwest portions of the City. This growth must be considered as the City moves forward with assessing and meeting fair housing and fair housing choice needs of its residents.

Assessment of Fair Housing: Until recently the Analysis of Impediments to Fair Housing Choice was the primary component of HUD's fair housing efforts. On July 16, 2015 HUD published its final rule on affirmatively furthering fair housing (AFFH). Three weeks earlier the U.S. Supreme Court upheld the distinct but related concept of disparate impact liability (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project*). The procedural aspects of the rule are new, but the fundamental concept is not: the requirement to affirmatively further fair housing is a key provision of the Fair Housing Act, as codified in Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3608). As a condition of accepting HOME Investment Partnerships Program funding, Community Development Block Grants, McKinney-Vento Homeless Assistance Grants and public housing subsidies, the rule required agencies to undertake "meaningful actions... that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." The AFFH final rule replaced the existing requirement to conduct an analysis of impediments to fair housing (AI) with that of a new study, the Assessment of Fair Housing (AFH). The new AFH framework provides grantees with a uniform template, firmer guidance from HUD, and a host of data and mapping tools to assist them in their fair housing analysis. However, in January 2018, HUD published a notice in the *Federal Register* titled "Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants." The notice states that for local government consolidated plan participants, the deadline for submitting their AFH will be extended to the next AFH submission date after October 31, 2020.

Despite this extension, the City chose to use the AFH framework in its update to its fair housing analysis in preparation of future required AFH submissions. Under the AFH final rule a jurisdiction's "meaningful actions" must:

- address significant disparities in housing needs and access to opportunity,
- replace segregation with truly integrated and balanced living patterns, and
- transform racially/ethnically concentrated areas of poverty into areas of opportunity.

There is no federal expectation for specific outcomes. Instead, agencies have to carefully and thoughtfully carry out the new process. To carry out the new approach to assessing fair housing issues, the City has reviewed HUD provided data and mapping tools, has undertaken an extensive community outreach and input process, and has worked across its departments to identify the most pressing contributing factors to fair housing issues facing residents to develop a set of six goals to address them. In the new approach, the City considers a set of fair housing issues along with predetermined contributing factors that are detrimental to fair housing choice. The City also used the data and analysis to prioritize the contributing factors most relevant to fair housing issues in Lubbock. The table below lists the contributing factors and how they relate to fair housing issues.

Fair Housing Issues	Contributing Factors
<p>Affordable Housing</p> <ul style="list-style-type: none"> • Because of university populations, housing around the schools where there is often job opportunities is too high for low income workers because those living in a roommate situation look at price points differently than a family household • Renter cost burden increased to 55% from 44% since 2010. • Renters are often burdened by rental fees and penalties, and the use of Tenant Tracker by many landlords makes it difficult for delinquent renters to move beyond past difficulties. • Seniors are also affected by rental housing practices as many properties require two-months rent to move in and seniors on fixed incomes are unable to save to afford that cost. 	<p>The availability of affordable units in a range of sizes</p>
<p>Transportation</p> <p>Housing Quality</p> <ul style="list-style-type: none"> • There is a lack of affordable housing opportunities near areas that contain employment opportunities • Bus routes do not extend to parts of town experiencing development • Stakeholders reported that there are not enough accessible bus routes 	<p>Location of employers</p> <p>The availability, type, frequency, and reliability of public transportation</p> <p>Access to transportation for persons with disabilities</p>

<ul style="list-style-type: none"> Residents in low income areas reported that neighborhood conditions have worsened while residents in higher income areas have reported improvements. 	<p>Lack of public investment in specific neighborhoods, including services or amenities.</p> <p>Deteriorated and abandoned properties.</p>
<p>Financial Services</p> <ul style="list-style-type: none"> East and North Lubbock do not have financial institutions to serve residents and many rely on pay day lenders. While organizations offer financial literacy training to individuals seeking homeownership opportunities, not all individuals are ready for homeownership. Employers of low income and young workers without bank accounts are using systems such as Netspend and GreenDot for paychecks resulting in a lack of credit history. 	<p>Access to financial services</p> <p>Lack of private investment in specific neighborhoods</p>
<p>Persons with Disabilities</p> <ul style="list-style-type: none"> Stakeholders report that there are not enough units for disabled individuals Senior population requires more accessible units and as the senior population grows the demand for these types of units increases. 	<p>Location of accessible housing</p> <p>Lack of assistance for housing accessibility modifications</p> <p>Lack of affordable, accessible housing in a range of unit sizes</p> <p>Access to publicly supported housing for persons with disabilities</p>
<p>Fair Housing Education</p> <ul style="list-style-type: none"> Lubbock does not have a fair housing group so it's difficult for people to know where to go for help. Generally, there is a lack of information and services for people dealing with Fair Housing Concerns. From 2008-2017 only 47 housing complaints were filed. Disability was the most cited claim followed by race. 	<p>Lack of resources for fair housing agencies and organizations</p> <p>Lack of local private fair housing outreach and enforcement</p>

To address fair housing issues and their contributing factors, the City developed goals that reflect strategies to improve fair housing choice. The goals consider each fair housing issue and the prioritized contributing factors. To reach these goals, the planning process was launched with a comprehensive review of existing studies for information and data relevant to housing needs and related issues. The documents consulted include local comprehensive plans and ordinances, the Consolidated Plan for the City of Lubbock, and other policy documents. Fair housing complaints

reported to HUD were reviewed and information included as well. Stakeholder interviews and community survey responses were used to provide additional data and observations. Surveys were provided in English and Spanish and distributed via the internet and in paper form. The City held three community focus group meetings to collect a diverse range of perspectives on issues of fair housing and fair housing choice. The primary data used in this assessment were HUD-provided data specifically for the AFH, and additional data were obtained from sources including Census reports, American Community Survey data, GreatSchools, ACS/Census GIS maps via PolicyMap. The six goals that the City established are listed below.

1. Seek options for improving housing affordability for renters
2. Improve transportation routes to provide access to greater employment opportunities
3. Increase code enforcement and investment in older neighborhoods
4. Improve financial literacy access to financial services for lower income individuals and neighborhoods.
5. Identify additional ways to connect persons with disabilities to accessible housing
6. Increase public awareness of fair housing rights and improve opportunity for reporting concerns

II. Community Participation Process

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

The City conducted community outreach through a range of efforts designed to solicit the most diverse perspectives possible. The City conducted a survey in English and Spanish that was available both on the internet and in paper form. The City asked its stakeholders to distribute information about the survey to populations they serve. The City also held three focus groups on April 4, 2018 and conducted targeted stakeholder interviews. In addition, the City tabled at community events to collect perspectives on fair housing. See more information on these outreach efforts and organizations consulted in number 2 below.

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

In order to gain pertinent information on fair housing needs and activities in Lubbock, the City conducted and analyzed Fair Housing Surveys completed by community residents and stakeholder organizations across the City; conducted three, issue-based focus groups; and interviewed key stakeholders including advocacy organizations and government officials. The survey was translated into Spanish. All meetings were held in accessible spaces, and the electronic surveys had an option of being converted to paper-

based versions. Paper based surveys were provided to local community organizations and at public events to gather responses from people in areas across the city and from diverse populations. Both formal and informal channels were used including sharing access to the survey at local businesses. The outreach was conducted in a way that aimed to include as many residents with as diverse backgrounds as possible in the process of gathering information on fair housing issues.

Fair Housing Survey – Web-based survey instruments, along with paper version options were distributed in both English and Spanish. The surveys were advertised and distributed through identified stakeholders and partner organizations.

Focus Groups – To further provide opportunities for stakeholder, advocates, and members of the public to provide in-person input, three focus group meetings were held on April 4, 2018. Each session was promoted to a list of stakeholders and resident organizations throughout the City. The purpose of these focus groups was to more deeply explore issues identified via the surveys and AFH data research, and allowed different constituencies to engage one another’s perspectives, and to identify key variations in viewpoints. Community residents and other interested parties were encouraged to participate in the public meetings, and interactive dialog was encouraged in order to illuminate fair housing nuances that are not easily explored through the other methods of outreach.

Each focus group was centered around a particular issue or group. These groups included:

- Service Providers
- Advocacy Organizations
- Government Officials

The following is a list of the organizations that were invited to send representatives to the meetings:

- Across the Street Ministries
- Alcohol Recovery Center of Lubbock, Inc.
- American Red Cross of Texas South Plains
- Backyard Mission
- Big Brothers Big Sisters of Lubbock
- Capital Mortgage Services
- CASA of the South Plains
- CASA of the South Plains, Inc.
- Catholic Charities Diocese of Lubbock
- Children's Advocacy Center of the South Plains
- City Bank Mortgage
- Communities in Schools of the South Plains
- Community Foundation of West Texas

- Community Health Center of Lubbock, Inc.
- Community Housing Resource Board
- East Lubbock Community Alliance
- East Lubbock Resident Owned Business Initiative
- Family Counseling Services
- Family Guidance and Outreach Center of Lubbock
- Family Promise of Lubbock
- First Progressive Baptist Church
- Goodwill Industries of Northwest Texas
- Guadalupe Economic Services Corp.
- Guadalupe Parkway Sommerville Centers
- Habitat for Humanity
- Happy State Bank
- Legal Aid of NorthWest Texas
- Legal Aid Society of Lubbock
- LHUCA
- Literacy Lubbock
- Lubbock Apartment Association
- Lubbock Area United Way
- Lubbock Association of Realtors
- Lubbock Boys' & Girls' Club, Inc.
- Lubbock Chamber of Commerce
- Lubbock Children's Health Clinic
- Lubbock Economic Development Alliance
- Lubbock Habitat for Humanity
- Lubbock Housing Authority
- Lubbock Housing Finance Corp.
- Lubbock Neighborhood Connection
- Lubbock Scottish Rite Bodies
- Lubbock Victims Assistance Services
- North & East Lubbock Community Development Corporation
- Oakwood Baptist Church
- Parenting Cottage, Inc.
- Peoples Bank Home Loan Center
- Prosperity Bank, Lubbock Ave. Q Banking Center
- Roots Historical Art Council
- Salvation Army, a Georgia Corporation
- Small Business Administration, West Texas District Office
- South Plains Association of Governments
- South Plains Association of Governments
- South Plains Food Bank
- South Plains Homeless Consortium

- Star Care Specialty Health System
- Texas Health & Human Services, Region I
- TTU Early Head Start
- Upbring Neighborhood House
- Volunteer Center of Lubbock
- West Texas Homebuilders Association
- Women's Protective Services of Lubbock, Inc.
- Workforce Solutions South Plains
- YWCA Lubbock

Direct input was also gathered from council members representing the City's lower income areas.

Targeted Stakeholder Interviews – To obtain additional more detailed perspectives, the City conducted telephone interviews with various stakeholders. Stakeholder interviews are intended to obtain more in-depth positions of various key constituencies such as planning officials and fair housing and transportation advocates, etc.

The interviews were held with the following organizations:

- Backyard Mission
- Lubbock Apartment Association
- Lubbock Housing Authority
- Lubbock Housing Finance Corporation
- Legal Aid Society of Lubbock
- Lubbock Economic Development Alliance

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

Overall, there was meaningful community participation. Each of the focus groups were scheduled to last two (2) hours, and all of the time was used for lively discussion in each session. A total of 46 community members attended across the three focus groups. Phone interviews lasted between ½ hour to one hour with the individuals interviewed. Additional interviews were added throughout the process to better understand issues as they were identified.

Where there was less engagement was with individual residents. Despite various forms of outreach including working directly with resident and community groups to enlist their help in engaging residents and attending public events to solicit participation in the survey. The survey had a low number of responses in both English and Spanish. The reasons speak to a general impediment to fair housing which is lack of understanding of the process and rights.

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

Comments received from the community during meetings and through the collection of perspectives in the survey can be summarized into a few general categories with recurring themes. They are listed below. All comments were considered in the development of the goals.

Affordable, Decent Housing: Citizens report that Lubbock continues to have a lack of affordable housing, particularly for seniors and those with disabilities. Lubbock's large student populations drive up rents in areas around the university that would be excellent living locations for lower income service industry workers. Due to higher rents in these areas, however, lower income individuals are forced to live away from these job markets. These challenges are exacerbated by the worsening condition of housing stock in some communities across Lubbock. Citizens noted an increased need for addressing the poor quality of housing in lower income areas through better code enforcement.

Persons with Disabilities: The area where most advocates see discrimination is around service animals for those with disabilities. Further, citizens report a lack of accessible housing units and accessible public transportation for people with disabilities.

Homelessness: Citizens report that it seems homelessness has worsened in the City despite notable efforts by local organizations working hard to address the issue.

Tenant Protections: Citizens noted that landlords are charging exorbitant fees on tenants that can often add up to more than past due rent amounts. Landlords also use a system called Tenant Tracker to report delinquent renters. Once in the Tenant Tracker system, tenants find it difficult to find quality housing.

Lending: Citizens reported a disparity in access to financial institutions across the City. In East Lubbock, a lower income area of the City, there are few banks where residents can visit to access credit and establish banking relationships. Many lower income individuals rely on payday lenders with predatory practices. Citizens also noted a need for greater financial literacy training in the City as many residents do not even have bank accounts and rely on card-based systems like Green Dot.

Transportation: Citizens reported significant challenges with public transportation routes across the City. Lubbock is growing and as job opportunities shift across the City, transportation routes need to be reassessed so that lower income individuals are able to reach the areas of the City where there are new employment options.

Fair Housing Education: Advocates generally reported that citizens do not understand fair housing rights or are afraid to speak up. Lubbock lacks a strong advocacy network specifically around fair housing awareness, however, some local organizations do offer classes on fair housing laws.

III. Assessment of Past Goals, Actions and Strategies

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

The 2014 Fair Housing Goals and Actions taken toward those goals are outlined in the chart below.

- a. Discuss what progress has been made toward their achievement;**
See chart for actions taken toward 2014 Fair Housing Goals.
- b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and**

Of the 15 goals identified in the 2014 Analysis of Impediments to Fair Housing, the City took action on seven of the goals. The goals where action was not taken fall largely in categories that required coordination outside the City departments.

- c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.**

Moving forward, the City will continue to engage its community partners, but with a more realistic eye toward the outcomes that are achievable when working with agencies where the City is not the primary decision maker. City partnerships, however, are vital to leveraging limited resources, and the City recognizes the valuable contributions of the stakeholders in its community. More efforts will be made to coordinate those contributions in ways that meet the fair housing goals.

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

As noted above, challenges in setting goals that are dependent on non-City agencies were noted in analyzing the results of past efforts. For current goals, the City has carefully chosen the goals that are manageable by the City with its strongest partners.

2014 RECOMMENDATION	ACTION TAKEN
Action #1: Support the increased production of affordable housing through public private partnerships with developers and capacity building for nonprofits.	CHDO and other local non profit housing organization development of affordable housing for purchase and rental
Action #2: Facilitate access to below-market-rate units.	CHDO, Local Housing Authority and other non profits
Action #3: Maintain a list of partner lenders.	Local nonprofits are a resource for partner lenders
Action #4: Identify and seek additional sources of funds for affordable housing.	
Action #5: Encourage private sector support for affordable housing initiatives.	
Action #6: Increase fair housing education and outreach.	Slight increase with collaboration with housing authority and local nonprofits
Action #7: Target outreach and training toward housing industry organizations and general public.	
Action #8: Encourage Fair Housing Enforcement Agencies to target increase fair housing testing for multifamily properties.	
Action #9: Increased efficiency of Public Transportation and Mobility.	Decreased due to reduced funding from citizens board recommendations to fund childcare, youth services and health services
Action #10: Apply for competitive and non entitlement State and Federal funding and assistance from nonprofit intermediaries.	
Action #11: Encourage bank and traditional lenders to offer products addressing the needs of households currently utilizing predatory lenders.	Some improvement – need to continue and develop stronger education components
Action #12: Provide language assistance to persons with limited English proficiency.	Yes CD staff available to communicate in Spanish as well written information on programs and fair housing in Spanish is available
Action #13: Continue to Implement an Affirmative Fair Housing Marketing Plan (AFHMP) to create fair and open access to affordable housing.	
Action #14: Continue to encourage recruitment of industry and job creation.	
Action #18: Design and implement a centralized program of self help initiatives.*	

*The report doesn't seem to have Actions 15-17, so it is suspected that 18 was a typo and should have been 15.

IV. Fair Housing Analysis

Demographic Summary

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

Racial/Ethnic Populations

The United States has a rich multi-cultural history where residents from many racial and ethnic backgrounds have been able to live and thrive. But there is also a history of institutional and social racism and segregation that has reduced access to opportunities for many people. To track and address this reality, it is useful to look at racial and ethnic trends and patterns over time. In this section, both the city of Lubbock and the Lubbock region will be analyzed. Generally, the two areas have similar demographics because the city of Lubbock makes up 77 percent of the region by population, but some significant differences exist and are addressed here.

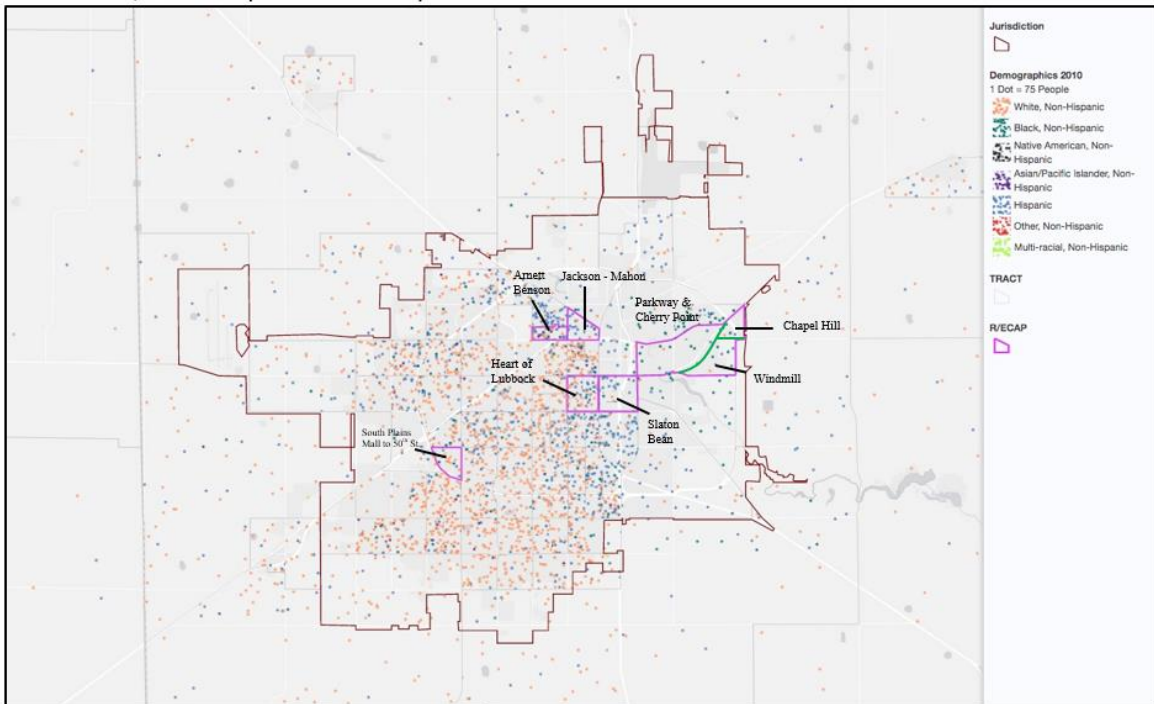
The table below shows the population of Lubbock, Texas and the region by race and ethnicity. Non-Hispanic whites are the majority in Lubbock, comprising 56 percent of the population. The second largest demographic is Hispanic, making up nearly one-third of the total population. Blacks are the third largest racial or ethnic group at approximately 8 percent.

	(Lubbock, TX CDBG, HOME, ESG) Jurisdiction		(Lubbock, TX) Region	
	#	%	#	%
White, Non-Hispanic	127,862	55.71%	165,424	56.88%
Black, Non-Hispanic	18,578	8.09%	20,269	6.97%
Hispanic	73,966	32.23%	94,838	32.61%
Asian or Pacific Islander, Non-Hispanic	5,439	2.37%	5,825	2.00%
Native American, Non-Hispanic	853	0.37%	1,067	0.37%
Two or More Races, Non-Hispanic	2,587	1.13%	3,085	1.06%
Other, Non-Hispanic	244	0.11%	297	0.10%

Source: Decennial Census, 2010 (HUD AFFHT0004, Table 1 – Demographics)

Citywide demographics are an important starting point for analysis, but a targeted views of various parts of the Lubbock community allow for a more complete picture of racial and ethnic distribution. The following map shows the population of census tracts throughout the city by racial group. The white, non-Hispanic population lives primarily in the center and western parts of the city. The Hispanic population appears to be more centrally located and is often concentrated in a few distinct neighborhoods. The black population is considerably smaller but appears to be concentrated on the eastern side of the city. Tracts with high minority concentrations meet one of the two requirements for a tract to be considered a racially/ethnically concentrated area of poverty (R/ECAP), as defined by the U.S. Department of Housing and Urban Development. R/ECAPs are discussed later in this report and are highlighted in each HUD map with a pink border.

MAP: Racial/Ethnic Population Density



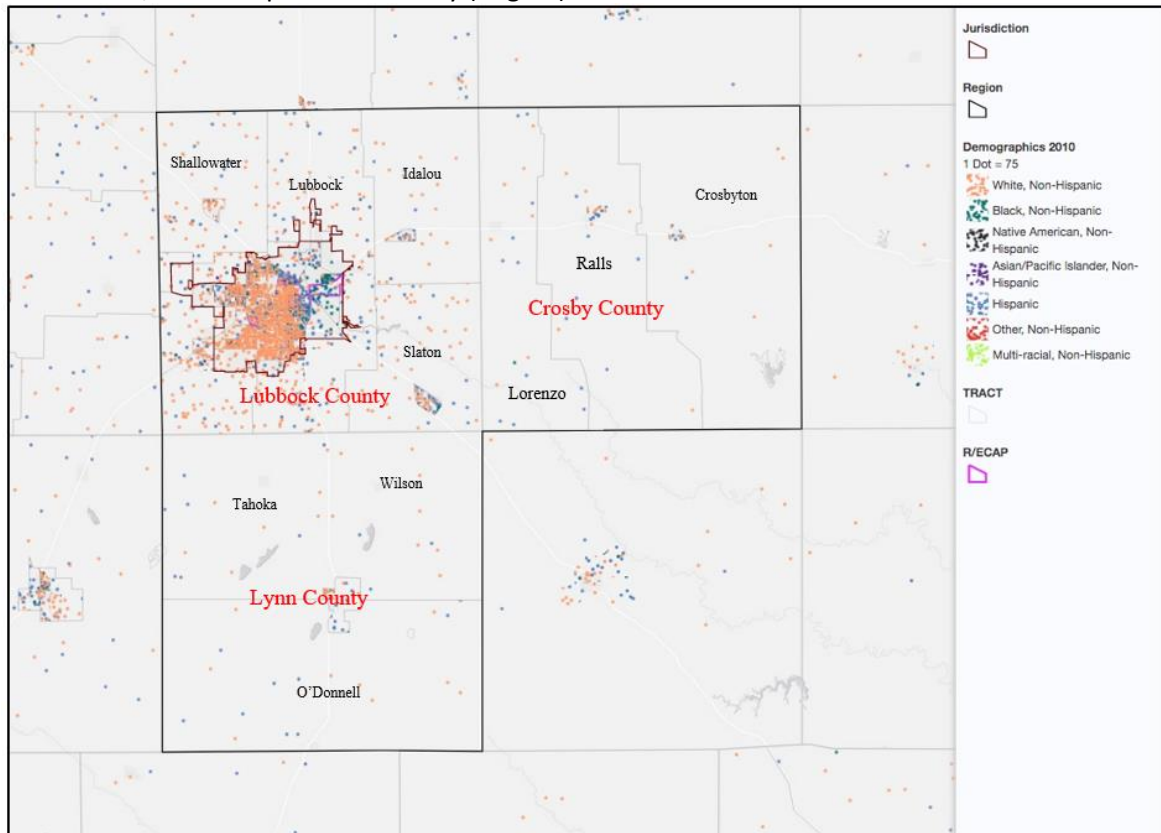
Source: Source: Decennial Census, 2010 (HUD AFFHT0004)

Data note: R/ECAP, 2009-2013 ACS

Racial/Ethnic (Region)

The Lubbock region includes Lubbock County, Lynn County, and Crosby County. Lynn and Crosby County are both very sparsely populated with approximately 6,000 each. The demographics of the region are very similar to the City of Lubbock. The White, non-Hispanic population is the largest racial cohort, comprising a slight majority, and the Hispanic population makes up nearly one third of the population. The third largest racial or ethnic group are Black residents who make up nearly seven percent of the regional population. The map below clearly shows that most of the residents live in or near the City but there are a few small population clusters along the major highways to the east, southeast, and south.

MAP: Racial/Ethnic Population Density (Region)



Source: Source: Decennial Census, 2010 (HUD AFFHT0004)

Data note: R/ECAP, 2009-2013 ACS

Racial/Ethnicity Trends

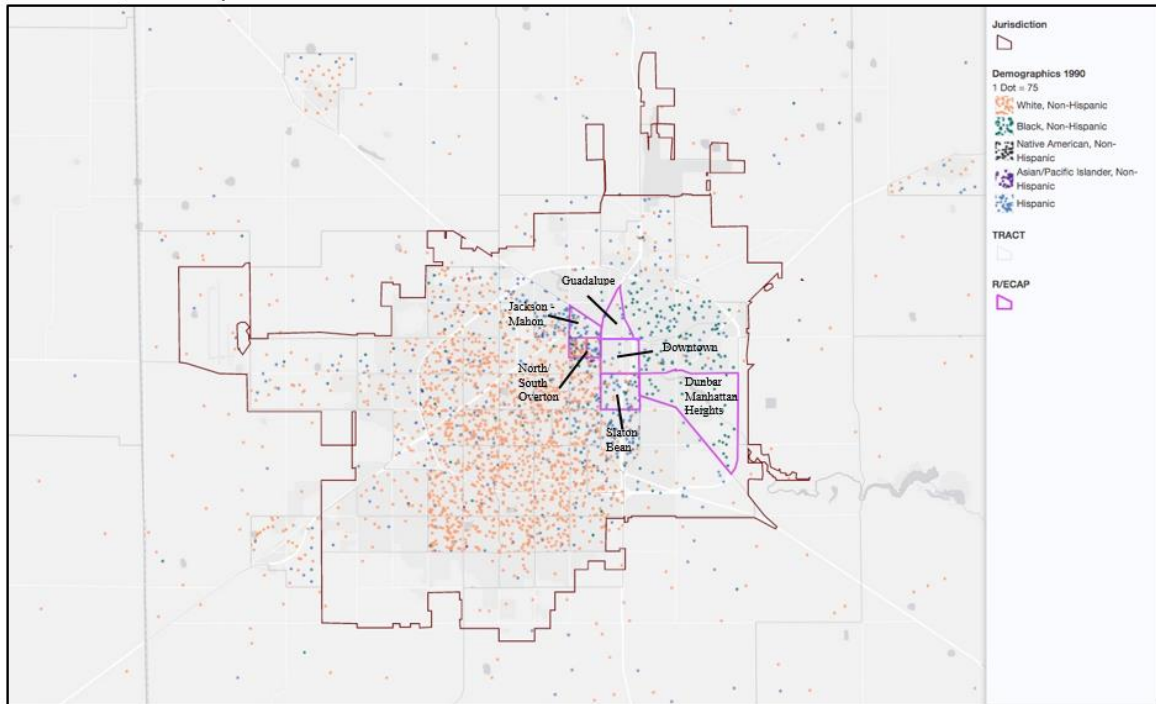
To forecast and prepare for the future needs of the community it is necessary to look at trends over the previous decades. Since 1990, the racial and ethnic demographics have begun to shift slightly in Lubbock. The White, non-Hispanic population has not grown and now represents a smaller portion of the population. Conversely, the Hispanic population has grown by nearly 75 percent from 42,471 to 73,966. The percentage of the population that identifies as Black has remained stable at approximately 8 to 8.5 percent since 1990. The Asian or Pacific Islander population has nearly doubled but the population is still relatively small with only 5,439 people, 2.4 percent of the population, identifying as such.

The race and ethnicity makeup of the region saw a similar change since 1990. The White, non-Hispanic population grew by approximately 6,500 people but they now represent a smaller portion of the overall population. This Hispanic population has grown by nearly 40,000 people, which is a growth from approximately 25 percent to one third of the population. The Black population has remained constant at approximately seven percent.

Table: Racial/Ethnicity Trends								
	(Lubbock, TX CDBG, HOME, ESG) Jurisdiction							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	128,161	67.64%	123,696	61.44%	127,862	55.71%	127,862	55.71%
Black, Non-Hispanic	15,356	8.10%	17,235	8.56%	19,637	8.56%	18,578	8.09%
Hispanic	42,471	22.42%	55,348	27.49%	73,966	32.23%	73,966	32.23%
Asian or Pacific Islander, Non-Hispanic	2,528	1.33%	3,453	1.72%	6,210	2.71%	5,439	2.37%
Native American, Non-Hispanic	477	0.25%	1,148	0.57%	1,526	0.66%	853	0.37%
	(Lubbock, TX) Region							
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	158,938	67.14%	158,370	61.80%	165,424	56.88%	165,424	56.88%
Black, Non-Hispanic	17,133	7.24%	19,222	7.50%	21,496	7.39%	20,269	6.97%
Hispanic	56,910	24.04%	72,979	28.48%	94,838	32.61%	94,838	32.61%
Asian or Pacific Islander, Non-Hispanic	2,597	1.10%	3,611	1.41%	6,695	2.30%	5,825	2.00%
Native American, Non-Hispanic	585	0.25%	1,532	0.60%	1,928	0.66%	1,067	0.37%
Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990, 2009-2013 ACS (HUD AFFHT0004, Table 2 - Demographic Trends)								

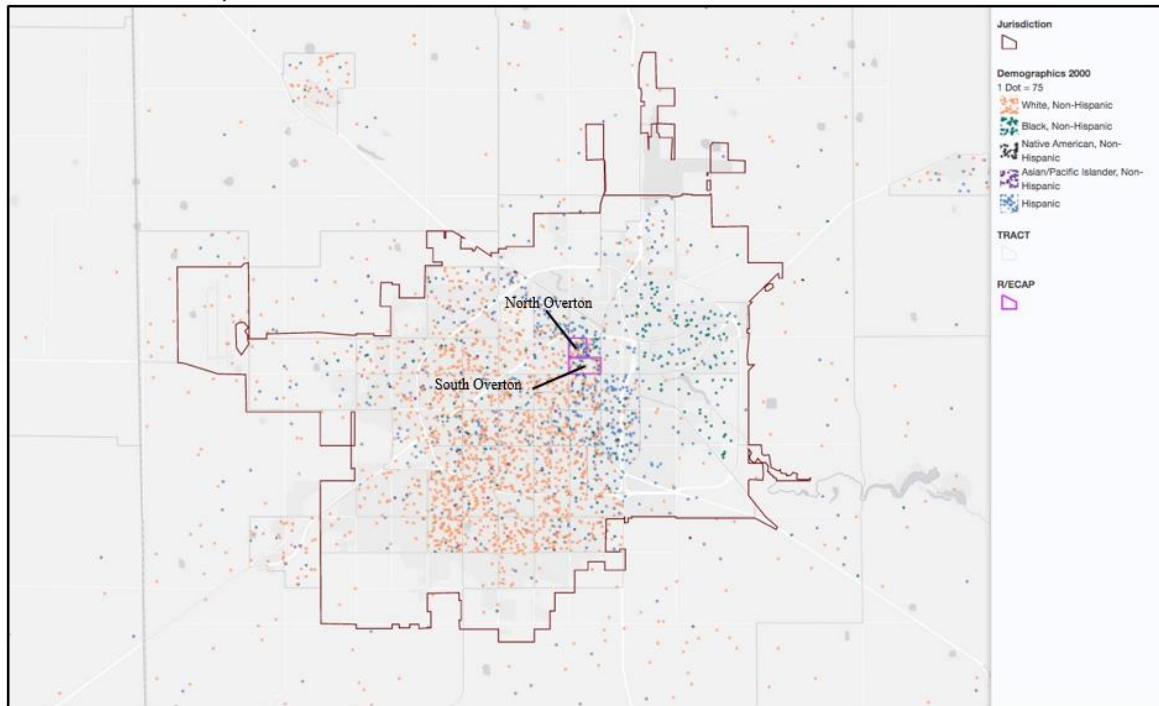
The following three maps show geographic distribution patterns by race and ethnicity since 1990, as well as the addition and subtraction of R/ECAP tracts. Since 1990, there appears to be greater integration in Lubbock. The R/ECAP tracts have shifted but continue to be primarily on the east side of the city.

MAP: Race/Ethnicity Trends 1990



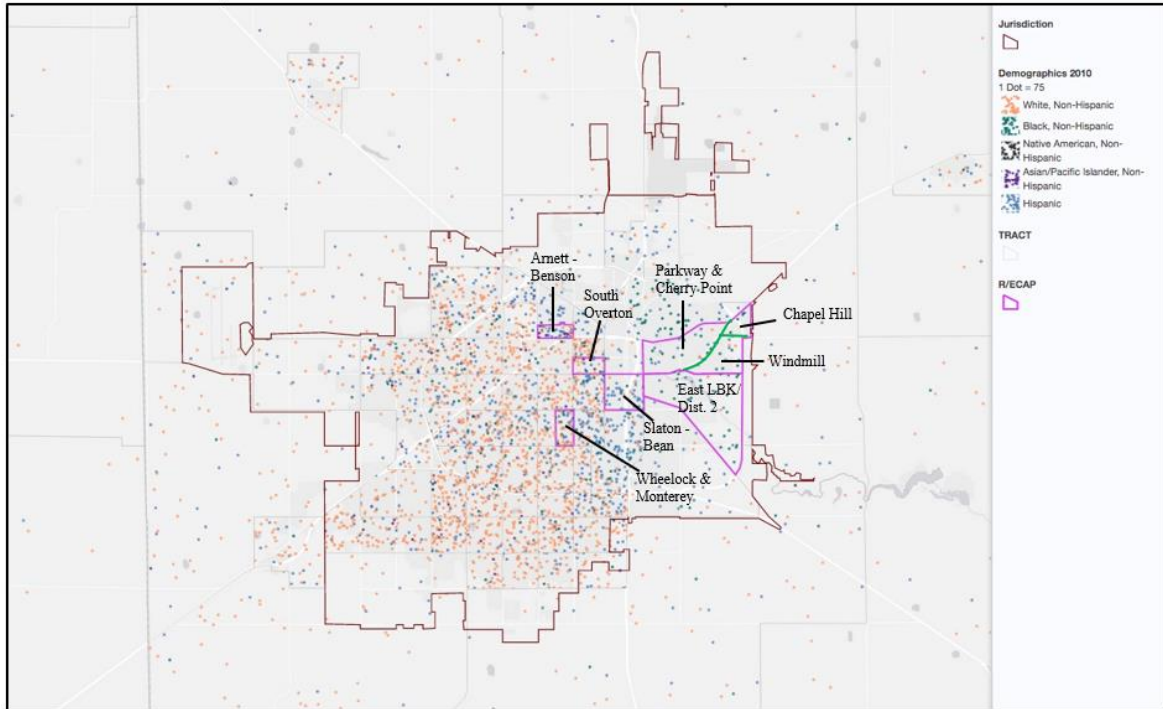
Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990 (HUD AFFHT0004)

MAP: Race/Ethnicity Trends 2000



Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990 (HUD AFFHT0004)

MAP: Race/Ethnicity Trends 2010



Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990 (HUD AFFHT0004)

National Origin Populations

In addition to racial and ethnic demographics resident data was analyzed based on national origin. The United States has a significant immigrant population and addressing the needs of this community promotes a strong and vibrant City. The City of Lubbock and the region's foreign-born population has doubled since 1990 and now makes up over 5 percent of the population.

	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Lubbock, TX Jurisdiction	6,248	3.30%	7,088	3.52%	12,281	5.35%	13,254	5.77%
Lubbock, TX Region	7,417	3.13%	8,718	3.40%	14,633	5.03%	16,527	5.68%

Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990, 2009-2013 ACS (HUD AFFHT0004, Table 2 – Demographic Trends)

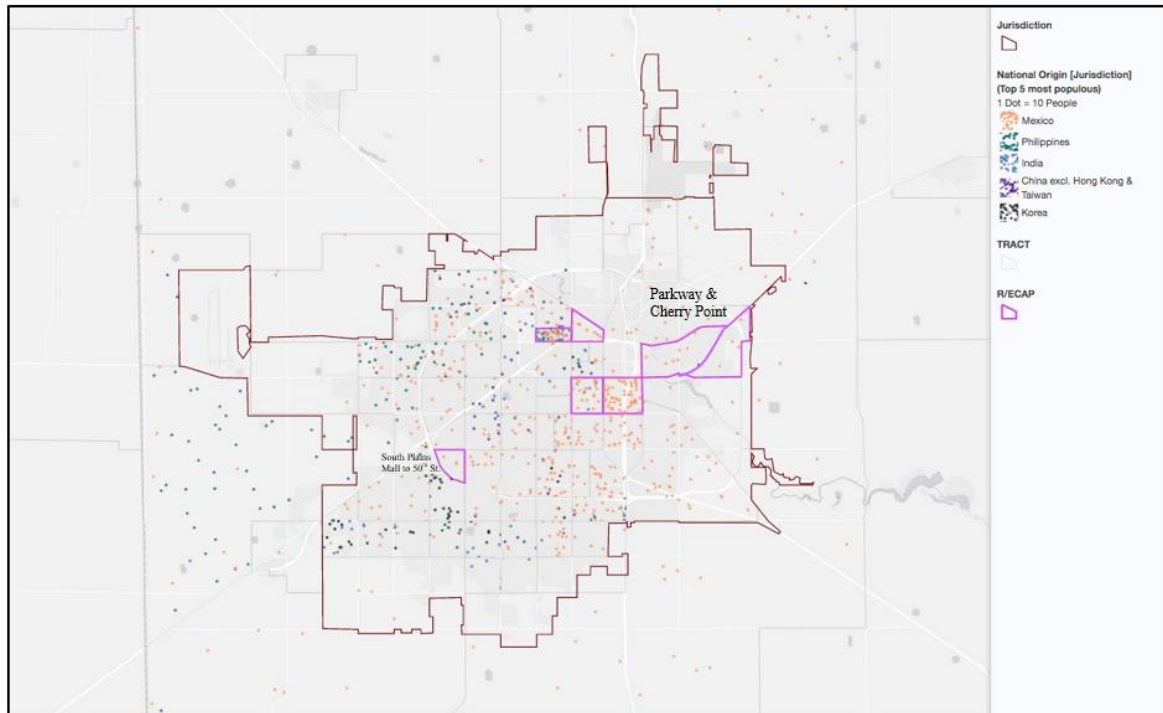
Unsurprisingly, the most common country of origin for Lubbock's foreign-born population is Mexico. Due to Texas' history and location there is a large Mexican-born population throughout the state. In Lubbock, approximately three percent of the population was born in Mexico. The second most common foreign country of origin is the Philippines with 1,221 residents, or about a half percent of the population. The region has similar demographics to that of the city; nearly three percent of the population is from Mexico and approximately half a percent is from the Philippines and India, respectively. The remaining most common national origins each make up less than percent each.

	Lubbock, TX Jurisdiction			Lubbock, TX Region		
	Country	#	%	Country	#	%
#1 Country of Origin	Mexico	5,794	2.68%	Mexico	8,191	2.99%
#2 Country of Origin	Philippines	1,221	0.56%	Philippines	1,252	0.46%
#3 Country of Origin	India	968	0.45%	India	988	0.36%
#4 Country of Origin	China*	523	0.24%	China*	523	0.19%
#5 Country of Origin	Korea	493	0.23%	Korea	517	0.19%
#6 Country of Origin	Canada	394	0.18%	Canada	434	0.16%
#7 Country of Origin	Vietnam	304	0.14%	Vietnam	304	0.11%
#8 Country of Origin	England	277	0.13%	El Salvador	278	0.10%
#9 Country of Origin	Germany	246	0.11%	England	277	0.10%
#10 Country of Origin	Colombia	165	0.08%	Germany	261	0.10%

Source: Decennial Census, 2010 (HUD AFFHT0004, Table 1 – Demographics)
 * Excluding Hong Kong and Taiwan

The following map displays location of foreign-born residents by census tract. There are several areas with large concentrations of foreign-born residents including two R/ECAP census tracts that have high Mexico-born populations and a R/ECAP tract that has several foreign-born populations. Mexico-born residents are found throughout most of the City while some populations, like residents born in Korea, appear to be more concentrated in just a few census tracts.

MAP: National Origin

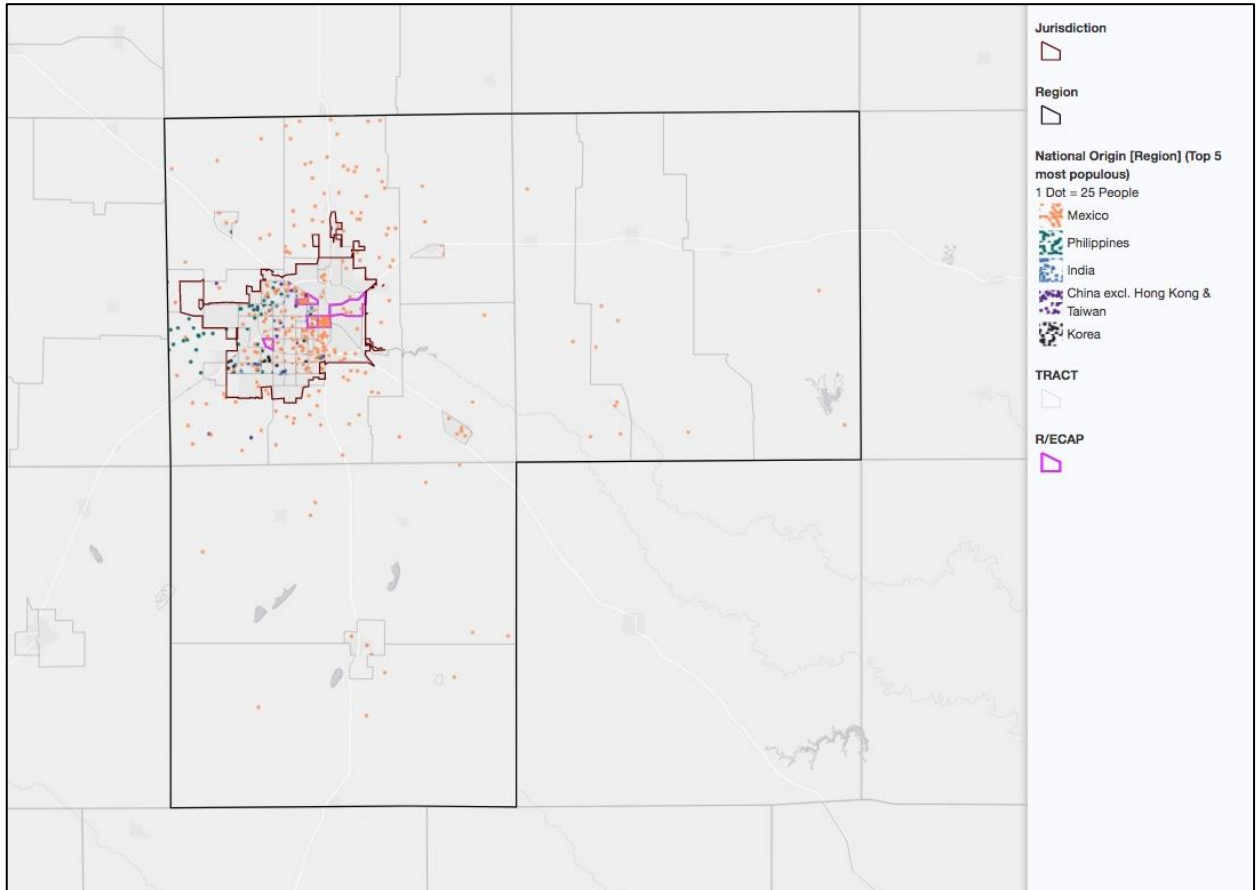


Source: Decennial Census, 2010 (HUD AFFHT0004)

Data note: R/ECAP, 2009-2013 ACS

The regional map of national origins shows that nearly all foreign-born residents live near the City of Lubbock. Except for residents born in Mexico, there is no significant foreign-born population outside Lubbock County. There is relatively large number of residents from the Philippines that live in a census tract to the west of the City of Lubbock.

MAP: National Origin (Region)



Source: Decennial Census, 2010 (HUD AFFHT0004)

Data note: R/ECAP, 2009-2013 ACS

Limited English Proficiencies (LEP)

Residents who are unable to communicate in English are at a significant disadvantage when it comes to accessing resources and economic opportunities. The United States does not have a legal national language, but English is the most commonly used language by far. Residents who immigrate to the United States generally must become fluent in English, but it is in the best interest of the City to provide additionally resources for residents with Limited English Proficiency (LEP). Within Lubbock, the number and percentage of LEP residents has decreased since 1990, despite an overall increase in the number of foreign-born residents in that time. Demographics in the region are very similar. While this is only one data point, it does seem to imply an increasing level of social integration among immigrants.

	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Lubbock, TX Jurisdiction	13,725	7.24%	11,917	5.92%	11,974	5.22%	10,897	4.75%
Lubbock, TX Region	17,937	7.58%	16,608	6.48%	15,813	5.44%	15,055	5.18%

Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000, Decennial Census 1990 and 2009-2013 ACS (HUD AFFHT0004, Table 2 – Demographic Trends)

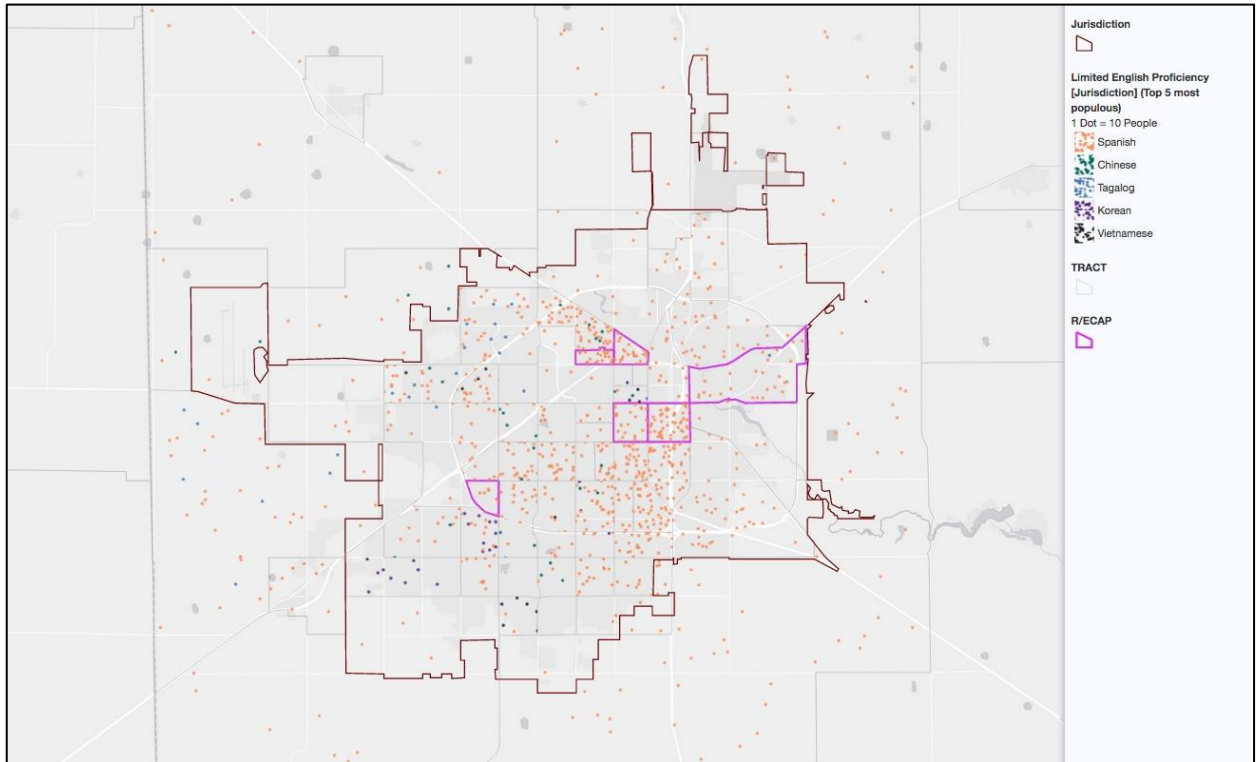
LEP is closely related to National Origin with many foreign-born residents primarily using the language of their birth country until they become proficient in English. The most common LEP language is Spanish in both the City of Lubbock and the overall region. Approximately 4.3 percent of the City speaks Spanish and has Limited English Proficiency. The remaining languages each represent less than 0.2 percent of the population.

	Lubbock, TX Jurisdiction			Lubbock, TX Region		
	Country	#	%	Country	#	%
#1 LEP Language	Spanish	9,360	4.33%	Spanish	13,263	4.85%
#2 LEP Language	Chinese	359	0.17%	Chinese	359	0.13%
#3 LEP Language	Tagalog	244	0.11%	Tagalog	244	0.09%
#4 LEP Language	Korean	228	0.11%	Korean	234	0.09%
#5 LEP Language	Vietnamese	158	0.07%	Vietnamese	158	0.06%
#6 LEP Language	Other Indic	146	0.07%	Other Indic	146	0.05%
#7 LEP Language	Arabic	101	0.05%	German	129	0.05%
#8 LEP Language	Scandinavian	86	0.04%	African	103	0.04%
#9 LEP Language	Other Asian	63	0.03%	Arabic	101	0.04%
#10 LEP Language	African	60	0.03%	Other Asian	89	0.03%

Source: Decennial Census, 2010 and 2009-2013 ACS (HUD AFFHT0004, Table 1 – Demographics)

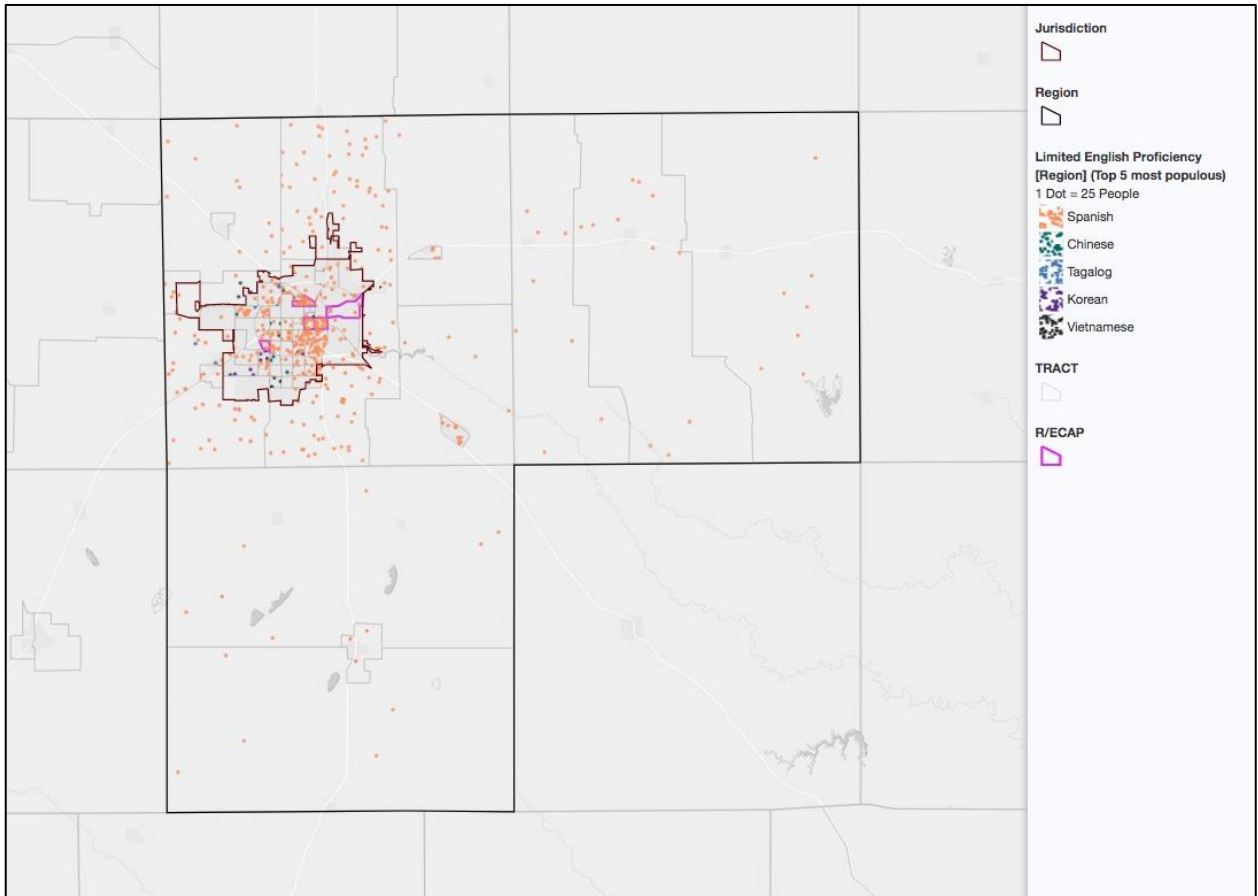
The two maps below show the geographic distribution of residents who have Limited English Proficiency in the City and Region. Residents with LEP living patterns are very closely related to the living patterns of foreign-born residents. Census tracts with a relatively large population from Mexico also have a relatively high number of residents who speak Spanish and areas with a large population born from in the Philippines have residents who speak Tagalog. The two countries of origin that do not have a specific language represented with an LEP population, Canada and India, both have English as a national language.

MAP: Limited English Proficiency (LEP)



Source: Decennial Census, 2010 and 2009-2013 ACS (HUD AFFHT0004)

MAP: Limited English Proficiency (LEP), (Region)



Source: Decennial Census, 2010 and 2009-2013 ACS (HUD AFFHT0004)

Families with Children

Just over 45 percent of the households in Lubbock and the region are families with children. Households with children face unique challenges and have additional needs than households without children. Access to stable housing, good schools, and economic opportunities are even more important for these households.

Table: Families with Children				
	(Lubbock, TX CDBG, HOME, ESG) Jurisdiction		(Lubbock, TX) Region	
	#	%	#	%
Families with Children	24,229	45.62%	31,459	45.34%
Source: Decennial Census, 2010 (HUD AFFHT0004, Table 1 – Demographics)				

Since 1990, the percentage of households that are families with children has decreased by about almost five percent. This reduction may be due to a number of demographic changes that the United States is going through, including Millennials starting families later in life and a longer living retiree population.

Table: Families with Children Trends								
	1990		2000		2010		Current	
	#	%	#	%	#	%	#	%
Lubbock, TX Jurisdiction	23,387	50.13%	19,228	48.21%	24,229	45.62%	24,229	45.62%
Lubbock, TX Region	29,912	50.31%	24,726	48.73%	31,459	45.34%	31,459	45.34%
Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000, Decennial Census 1990 and 2009-2013 ACS (HUD AFFHT0004, Table 2 – Demographic Trends)								

General Issues

Segregation/Integration

1. Analysis

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

According to the Racial/Ethnic Dissimilarity Trends provided by HUD, segregation levels in Lubbock have seen a moderate decrease since 1990. According to HUD:

“[t]his dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation between the two groups measured. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate high levels of segregation.”

The overall Non-White/White and the Hispanic/White segregation levels have reduced from moderate to low and the Black/White segregation levels have reduced from high to moderate. Addressing segregation is a major goal of HUD and Lubbock appears to be heading in the right direction. Currently, the groups facing the highest level of segregation is the Black, non-Hispanic population.

The region has seen a similar pattern, but the shift has been less pronounced. Whereas in Lubbock the dissimilarity trends scores have decreased by nearly 15 points in most demographics it has only reduced by 5-10 in the region.

	Lubbock, TX (Jurisdiction)				Lubbock, TX (Region)			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	52.48	48.32	38.22	41.61	46.50	42.89	35.04	39.17
Black/White	63.22	56.82	47.38	52.25	58.59	53.33	46.14	53.63
Hispanic/White	52.15	48.70	39.16	42.00	46.37	43.42	35.90	39.04
Asian or Pacific Islander/White	33.48	29.90	29.09	36.25	38.10	34.90	33.23	40.39

Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990, ACS (HUD AFFHT0004, Table 3 - Racial/Ethnic Dissimilarity Trends)

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

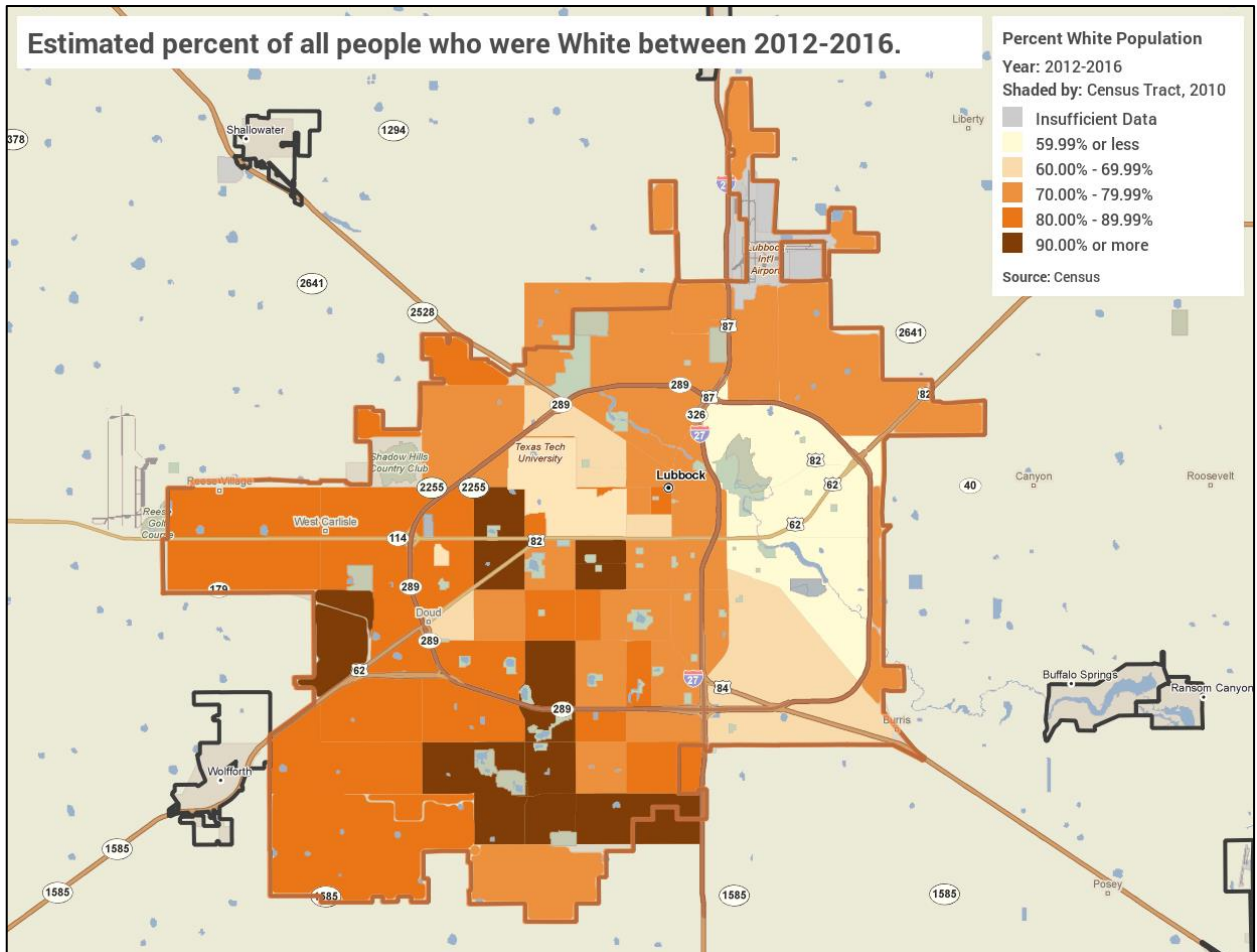
In the following section maps and data from the 2012-2016 American Community Survey (ACS) is used. This is the most updated data available and is used to supplement the HUD provided data above. In some cases, the racial groups provided by the ACS do not match up precisely with the HUD demographics.

Race/Ethnicity

White

Most census tracts throughout the City have between 70 and 90 percent of the population that identifies as White. There are a few areas with relatively high levels of segregation. The southwest area of the city, particularly in the south near a collection of lakes, parks, and country clubs, have a disproportionately high number of White residents.

MAP: Geographic Distribution of White Population

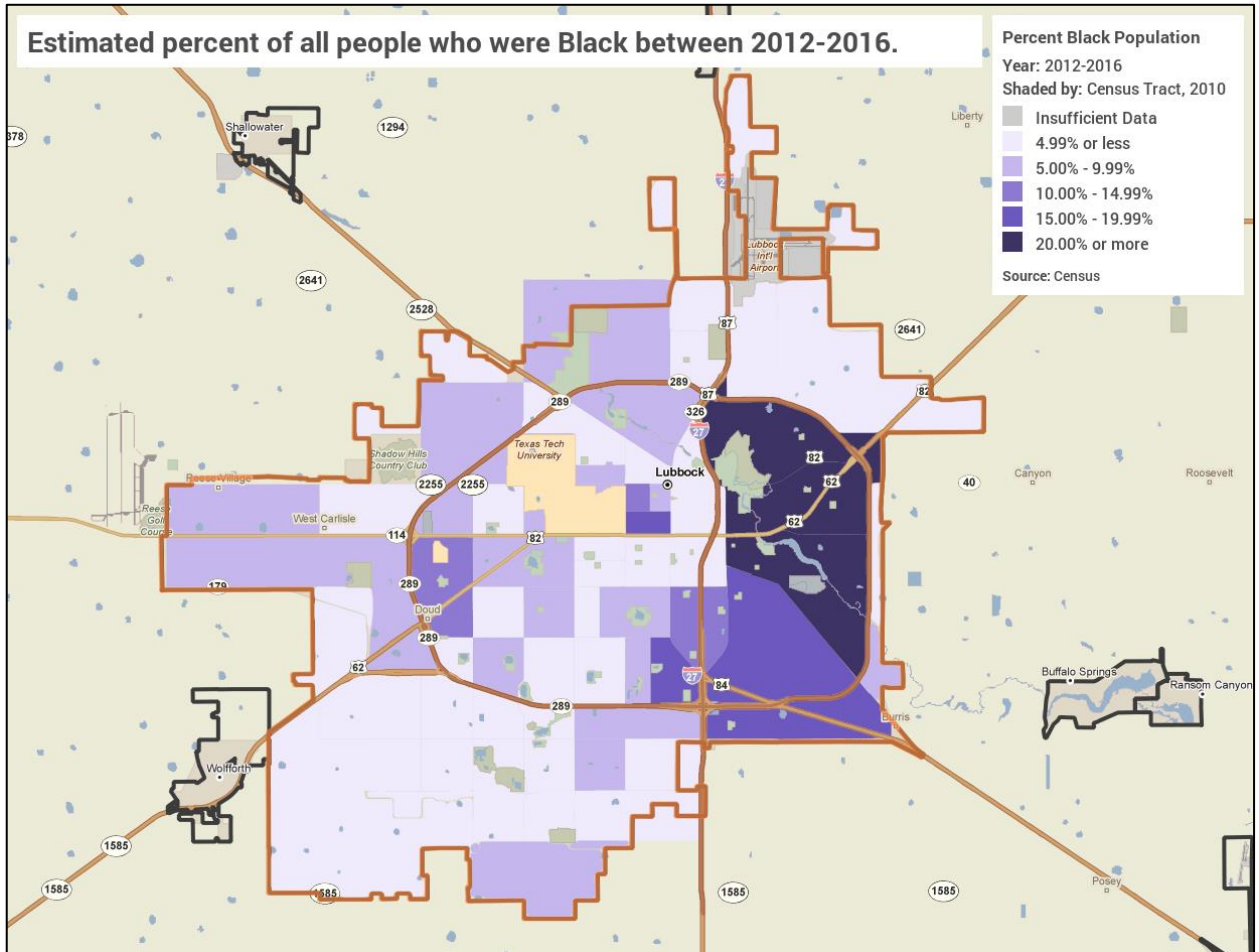


Source: 2012-2016 ACS via PolicyMap

Black

The census tracts with a relatively high Black population are primarily tracts with a low White population. As mentioned earlier, the Black/White dissimilarity index points to these two racial groups having the highest segregation in the City. The eastern tracts of the city surrounding Mackenzie Park have the largest Black population in the city.

MAP: Geographic Distribution of Black Population

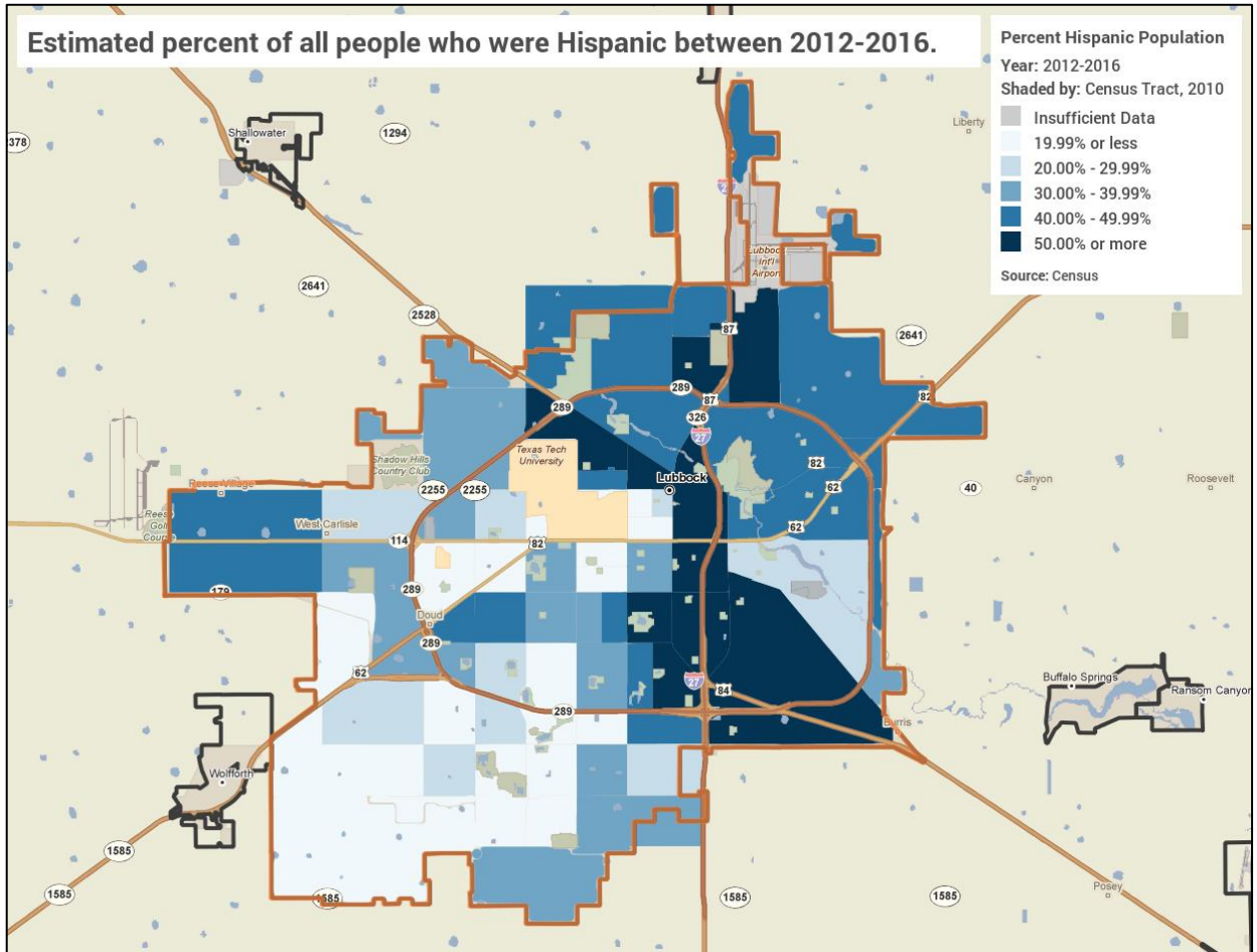


Source: 2012-2016 ACS via PolicyMap

Hispanic

The Hispanic population is the second largest racial or ethnic group in Lubbock. There are some areas of relative segregation. Hispanic residents are significantly less likely to live in areas with a high White population than elsewhere in the City. Many census tracts on the eastern part of Lubbock are majority Hispanic areas.

MAP: Geographic Distribution of Hispanic Population

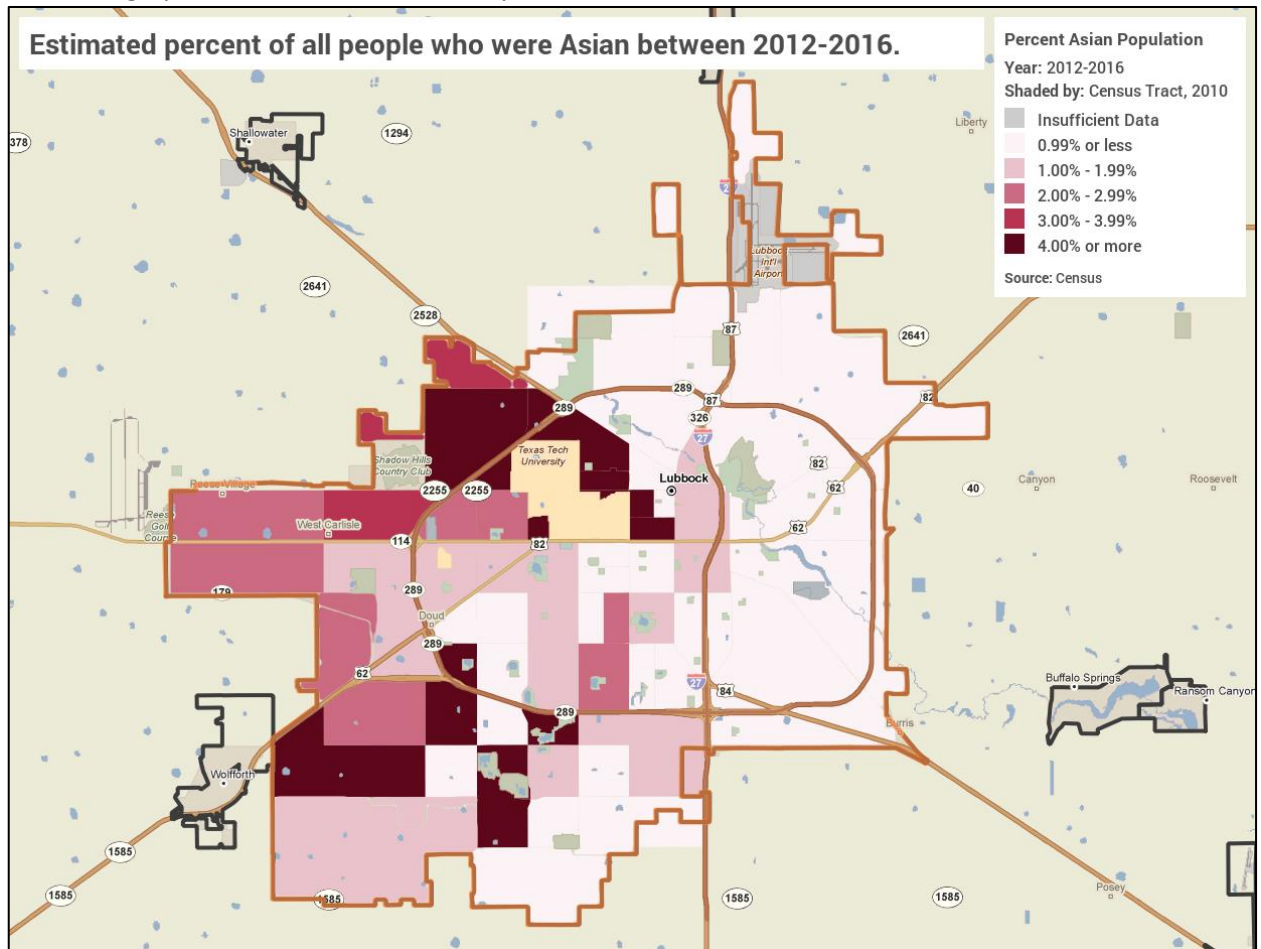


Source: 2012-2016 ACS via PolicyMap

Asian

The Asian population is relatively small in Lubbock but there are some census tracts with a disproportionately high number of Asian residents. Tracts around Texas Tech University and in the southwest have an Asian population of 4 percent or more.

MAP: Geographic Distribution of Asian Population

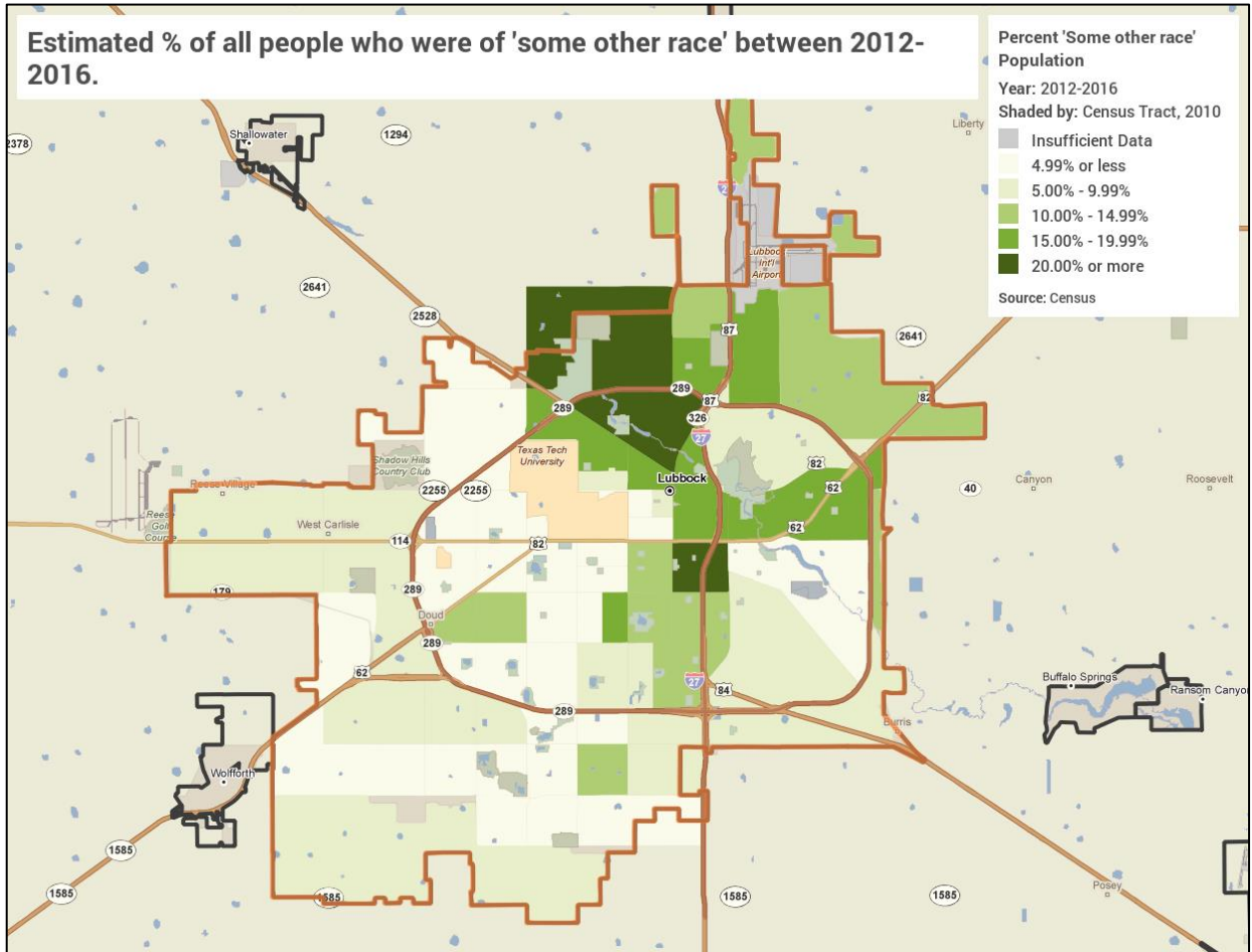


Source: 2012-2016 ACS via PolicyMap

Some Other Race

The US Census allows residents to select “Some Other Race” if they feel that the list does not provide an appropriate choice. Approximately 7 percent of Lubbock’s population selected “Some Other Race” in the most recent American Community Survey. The census tracts to the north around Lubbock Lake National Historic Landmark and in the east-central area south of the Highway 62 and I-27 intersection have a disproportionately large number of residents who identified as “Some Other Race”.

MAP: Geographic Distribution of “Some Other” Population



Source: 2012-2016 ACS via PolicyMap

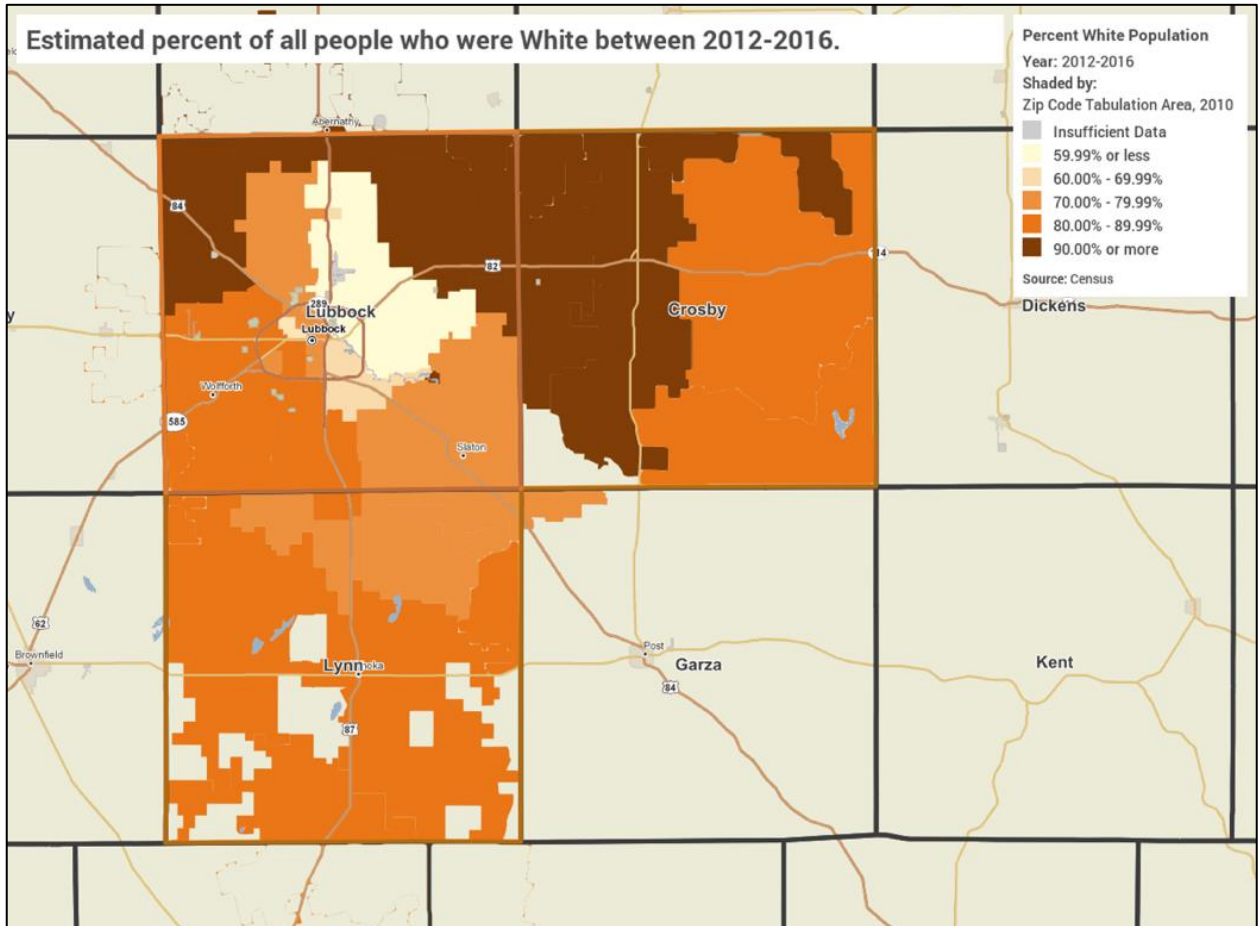
The 2012-2016 ACS provides data for three other racial groups: Native Hawaiian and Pacific Islander, Native American and Alaska Native, and Two or more races but these groups were too small to identify any patterns of segregation.

Race/Ethnicity (Region)

White (Region)

Regionwide, ZIP Codes in the rural areas have a higher percentage of the population that is White than those in Lubbock. Particularly, there is one ZIP Code that includes the northeastern parts of Lubbock that have a smaller than average White population.

MAP: Geographic Distribution of White Population (Region)

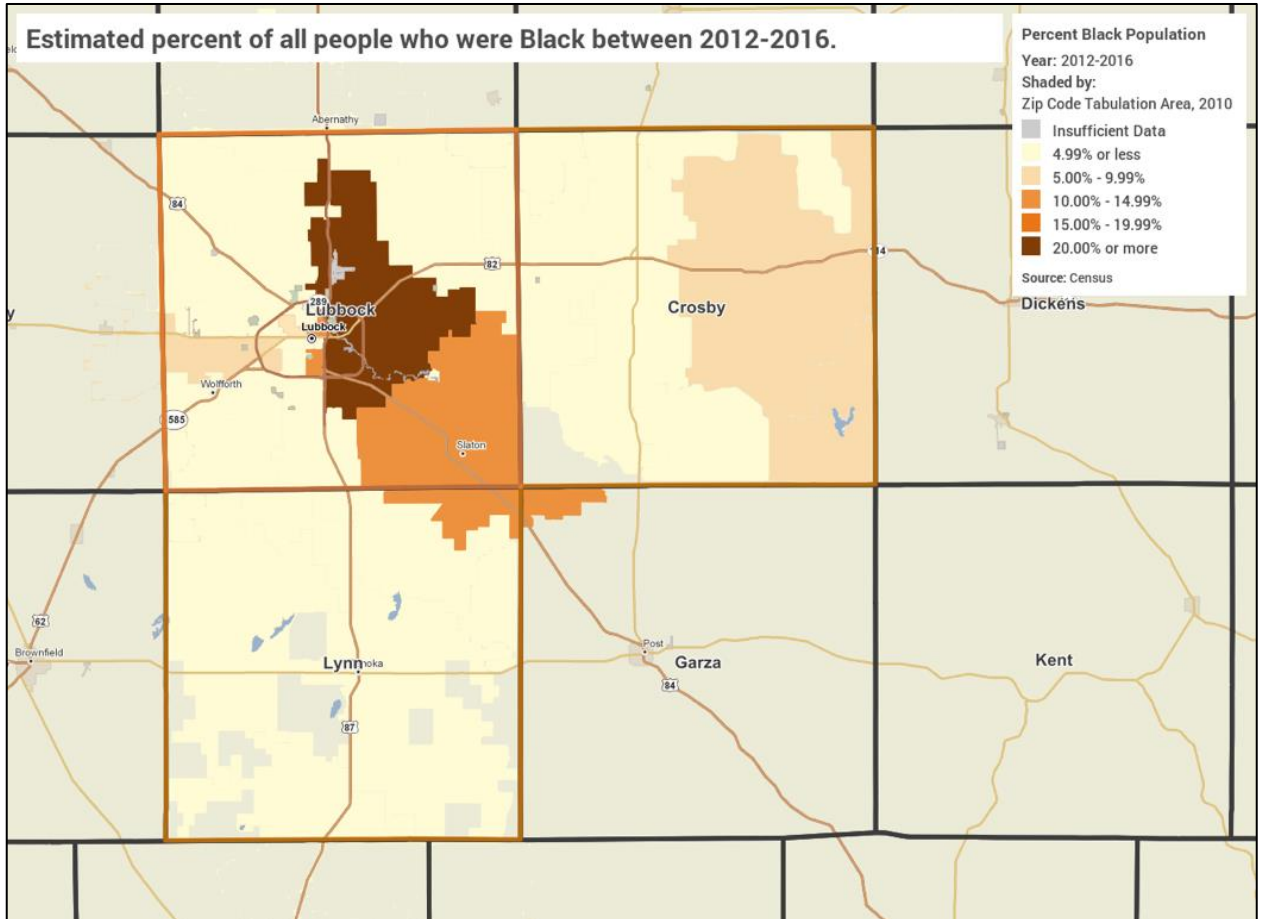


Source: 2012-2016 ACS via PolicyMap

Black (Region)

Black residents in the region primarily live in one area, the eastern portion of Lubbock County. One ZIP code has 20 percent or more of the population that identify as Black, but most tracts have less than 5 percent of the population that is Black.

MAP: Geographic Distribution of Black Population (Region)

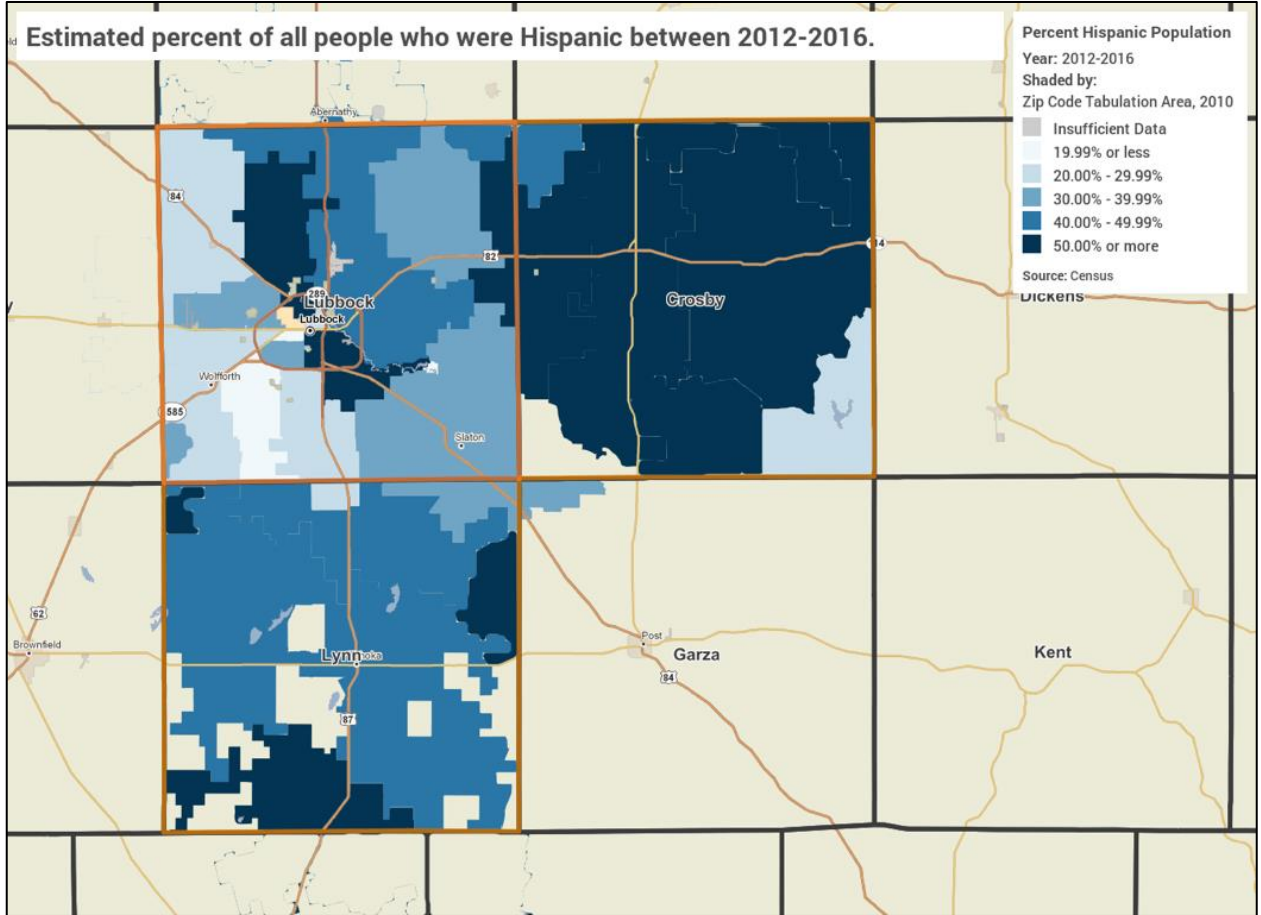


Source: 2012-2016 ACS via PolicyMap

Hispanic (Region)

The Hispanic population is spread throughout the Region and is present in rural and urban tracts. Downtown Lubbock has a large Hispanic population, as does ZIP codes in Crosby and Lynn County. Most areas have at least 30 percent of the population that identify as Hispanic.

MAP: Geographic Distribution of Hispanic Population (Region)

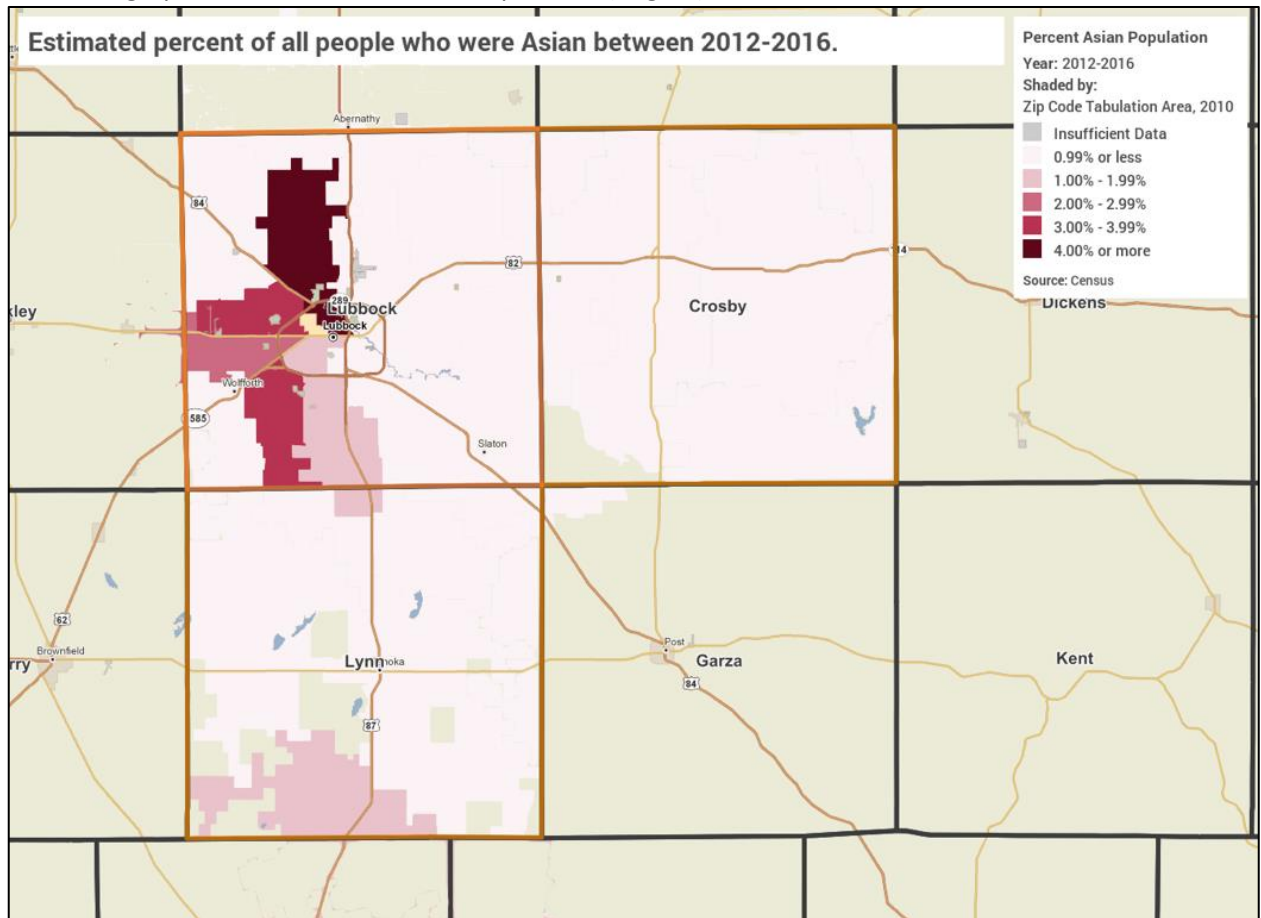


Source: 2012-2016 ACS via PolicyMap

Asian (Region)

The Asian population in the Region is relatively small but there are ZIP codes with a concentration of Asian residents. Census tracts on the north and western sides of Lubbock tend to have a higher Asian population than other areas of the Region

MAP: Geographic Distribution of Asian Population (Region)

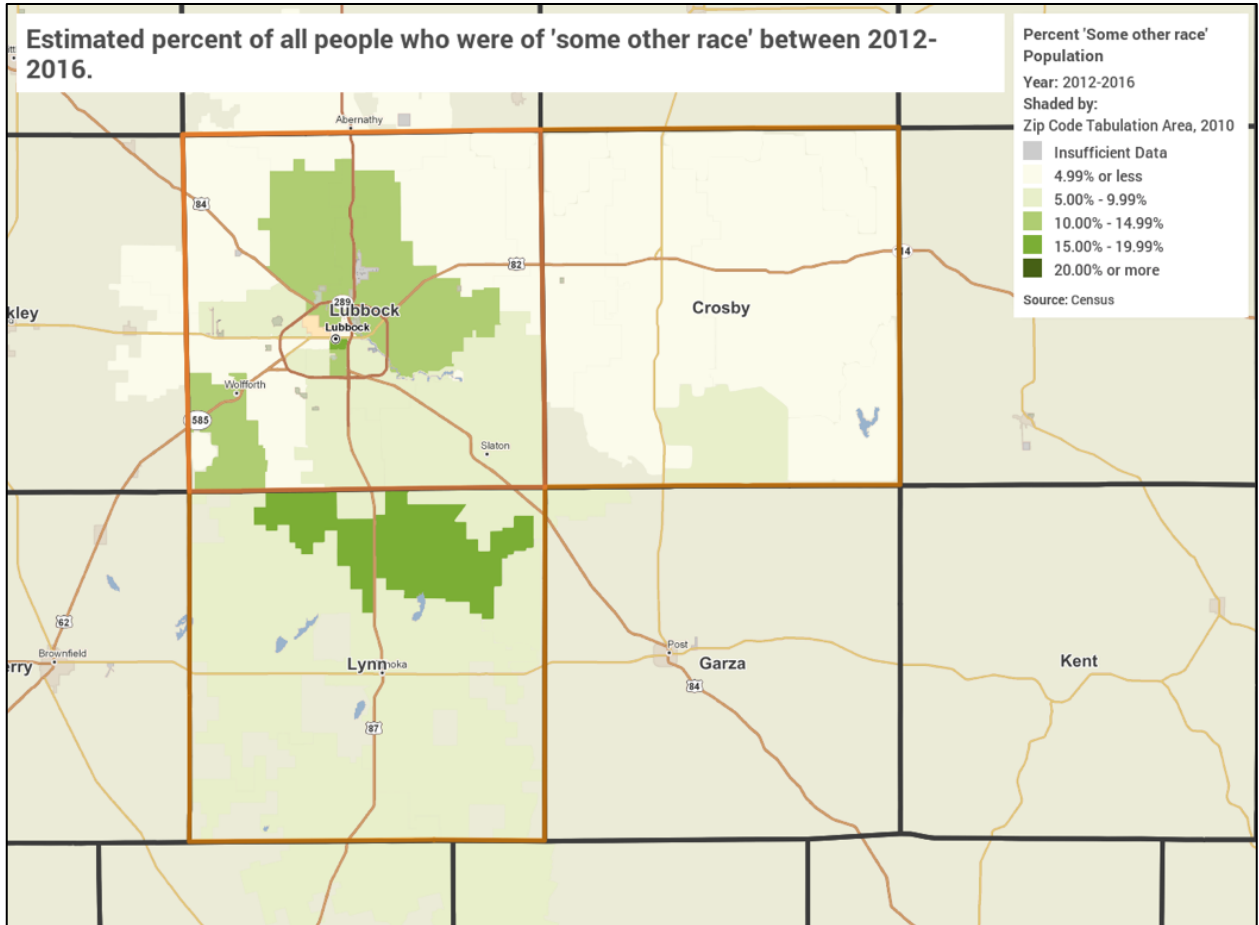


Source: 2012-2016 ACS via PolicyMap

Some Other Race (Region)

Residents that identify as “Some Other Race” are distributed throughout the Region. Many ZIP Codes throughout the City of Lubbock and the neighboring counties have 10 percent or more that identify with this racial group.

MAP: Geographic Distribution of “Some Other” Population (Region)



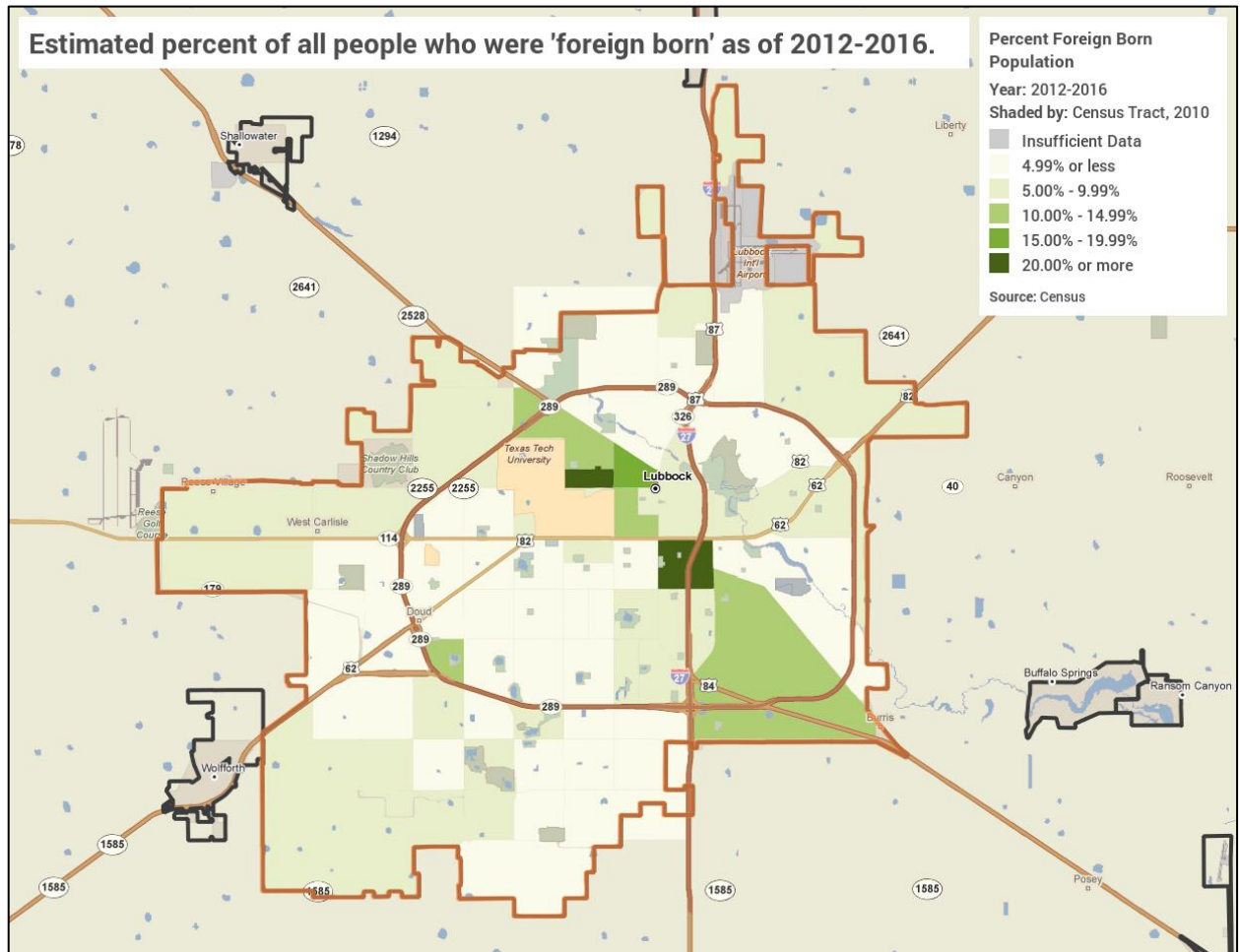
Source: 2012-2016 ACS via PolicyMap

The 2012-2016 ACS provides data for three other racial groups: Native Hawaiian and Pacific Islander, Native American and Alaska Native, and Two or more races but these groups were too small to identify any patterns of segregation.

National Origin

The foreign-born population is heavily segregated in Lubbock. A few Census Tracts have over 20 percent of their population that is foreign-born. It is common for many new immigrants to live with, or near, family members and others from their birth country. This is not necessarily a bad thing, but it is something that community leaders should be aware of and additional support may be necessary to aid in integration.

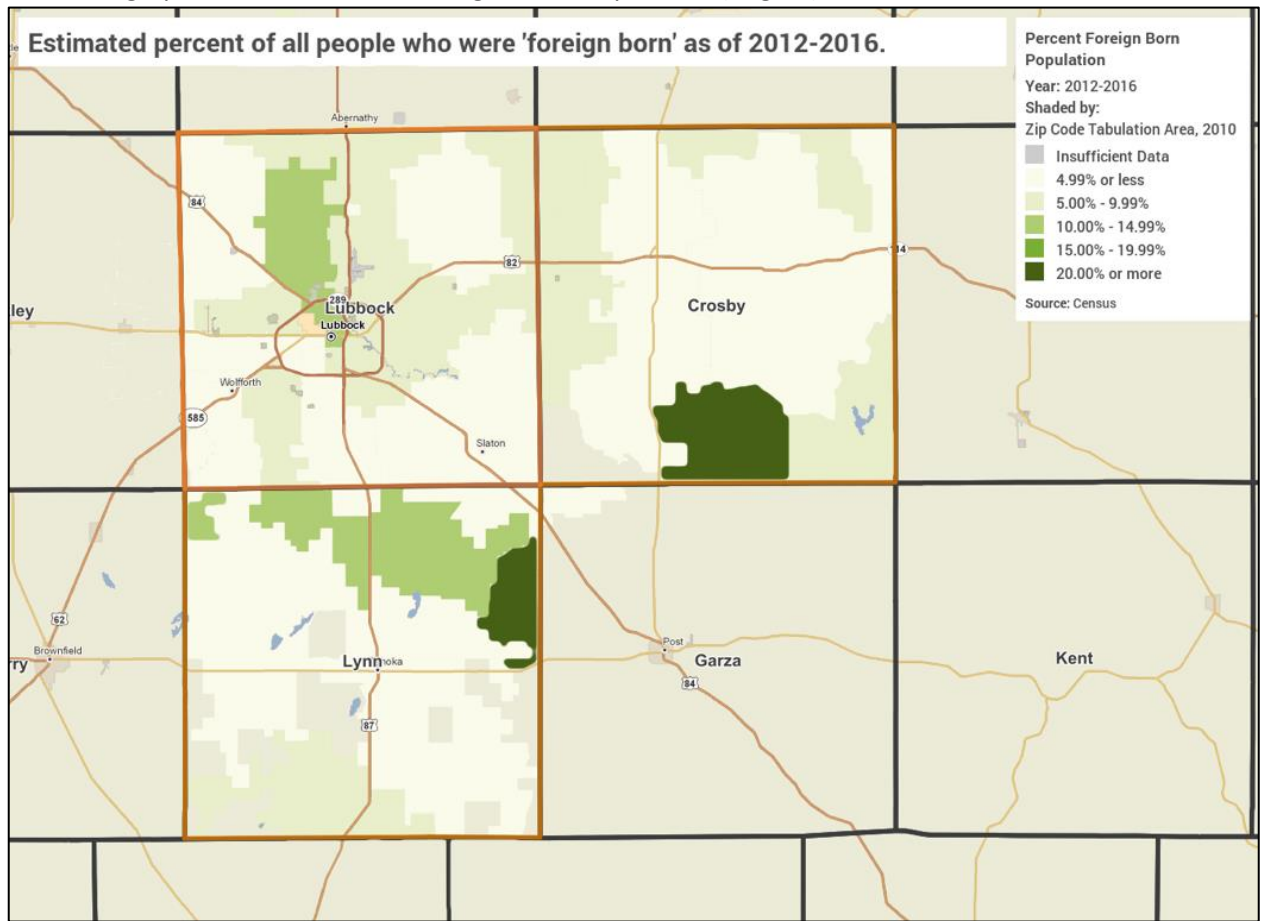
MAP: Geographic Distribution of "Foreign Born" Population



Source: 2012-2016 ACS via PolicyMap

National Origin (Region)

MAP: Geographic Distribution of "Foreign Born" Population (Region)

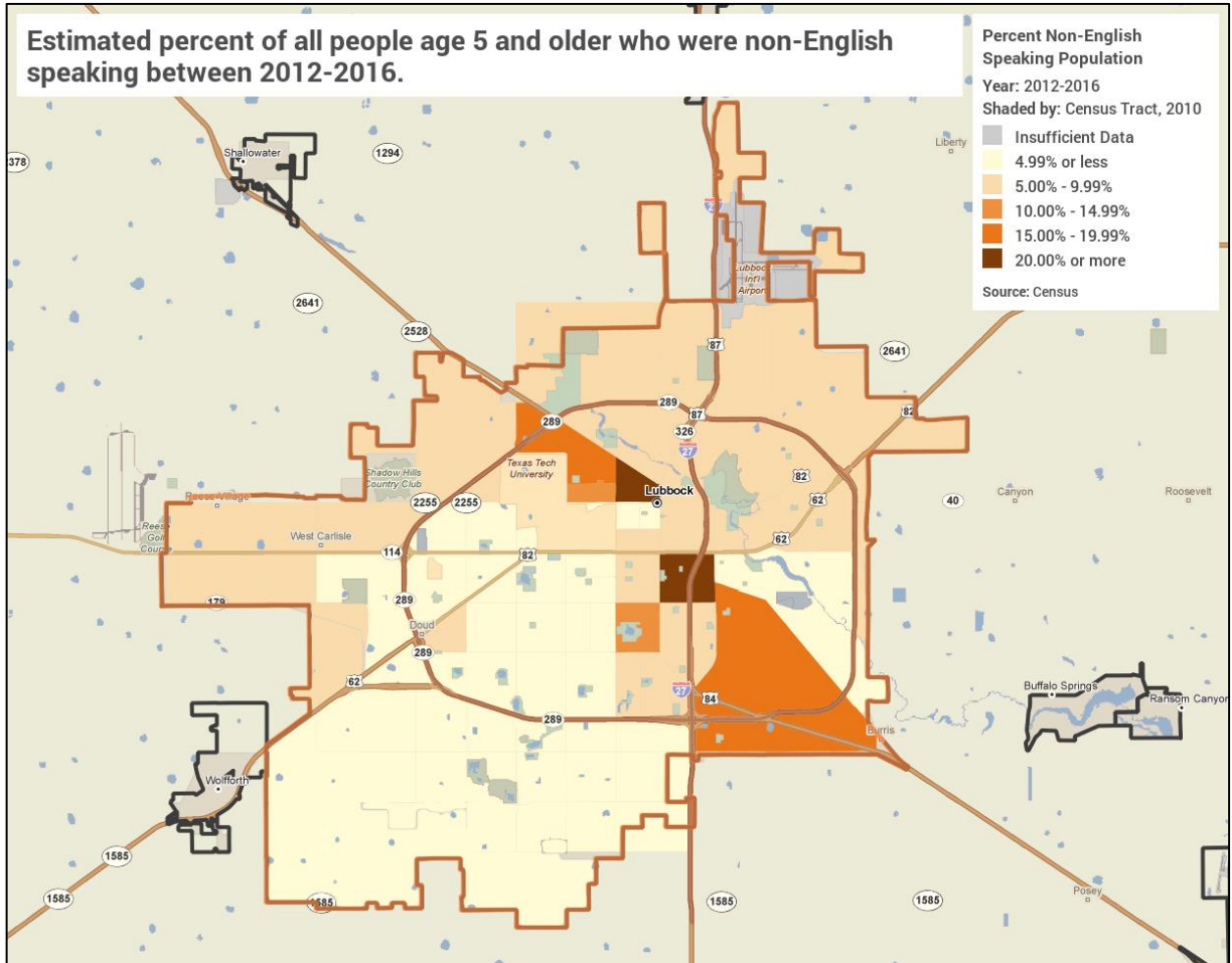


Source: 2012-2016 ACS via PolicyMap

LEP

The distribution of the non-English speaking population is similar to the foreign-born population map displayed above. There are several census tracts in the center areas of the city that have a disproportionately high number of residents who are non-English speaking.

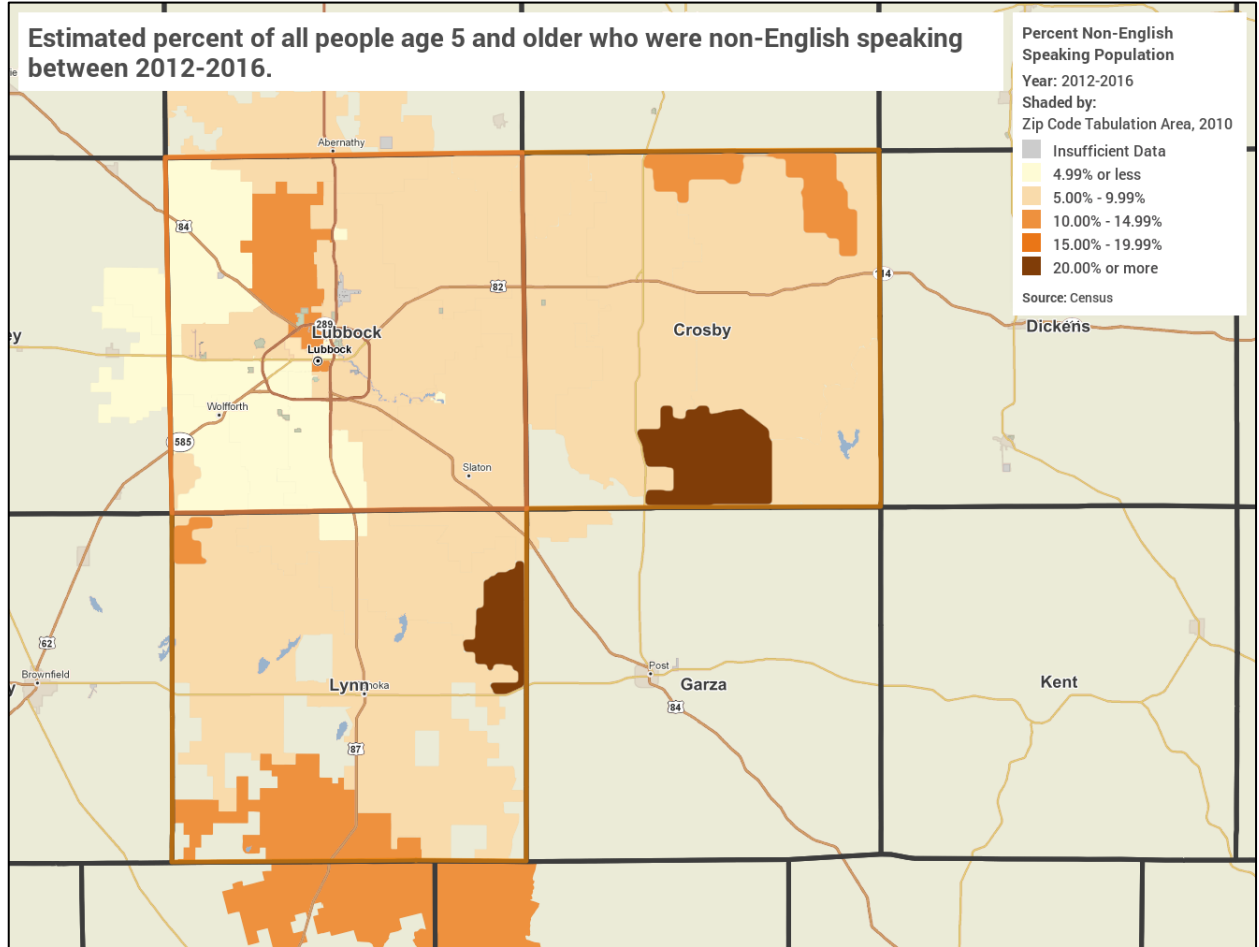
MAP: Geographic Distribution of “Non-English Speaking” Population



Source: 2012-2016 ACS via PolicyMap

LEP (Region)

MAP: Geographic Distribution of “Non-English Speaking” Population (Region)



Source: 2012-2016 ACS via PolicyMap

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

According to the Racial/Ethnic Dissimilarity Trends provided by HUD, segregation levels in Lubbock have seen a moderate decrease since 1990. According to HUD:

The overall Non-White/White and the Hispanic/White segregation levels have reduced from moderate to low and the Black/White segregation levels have reduced from high to moderate. Addressing segregation is a major goal of HUD and Lubbock appears to be heading in the right direction. Currently, the groups facing the highest level of segregation is the Black, non-Hispanic population.

The region has seen a similar pattern, but the shift has been less pronounced. Whereas in Lubbock the dissimilarity trends scores have decreased by nearly 15 points in most demographics it has only reduced by 5-10 in the region.

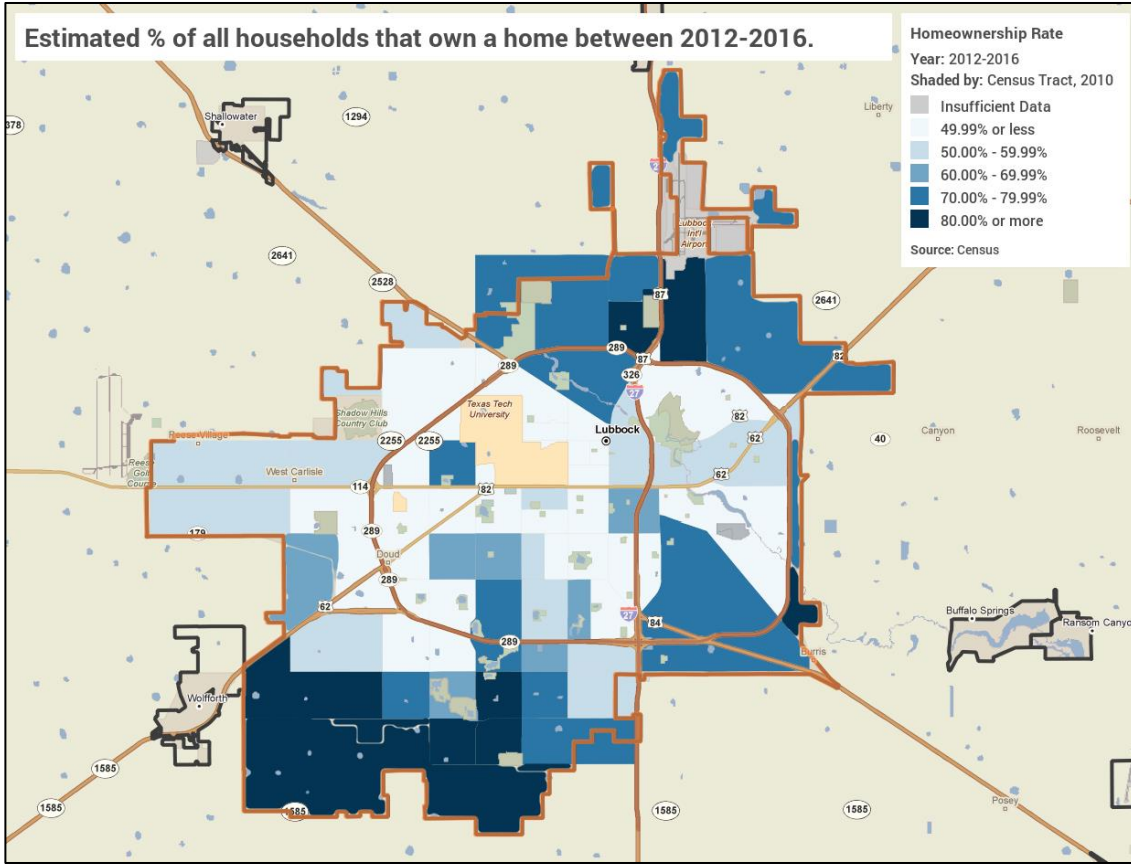
	Lubbock, TX (Jurisdiction)				Lubbock, TX (Region)			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	52.48	48.32	38.22	41.61	46.50	42.89	35.04	39.17
Black/White	63.22	56.82	47.38	52.25	58.59	53.33	46.14	53.63
Hispanic/White	52.15	48.70	39.16	42.00	46.37	43.42	35.90	39.04
Asian or Pacific Islander/White	33.48	29.90	29.09	36.25	38.10	34.90	33.23	40.39

Source: Brown Longitudinal Tract Database based on Decennial Census 2010, Decennial Census 2000 and Decennial Census 1990, ACS (HUD AFFHT0004, Table 3 - Racial/Ethnic Dissimilarity Trends)

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

The following two maps show the distribution of housing in Lubbock and the surrounding region. The first map displays the percentage of owner-occupied housing by census tract. The tracts with the most owner-occupied housing is in the southwest part of the city and in the northeast, just south of the airport. The southern tracts are somewhat segregated and have an above average White population. The tract to the south of the airport is much more integrated.

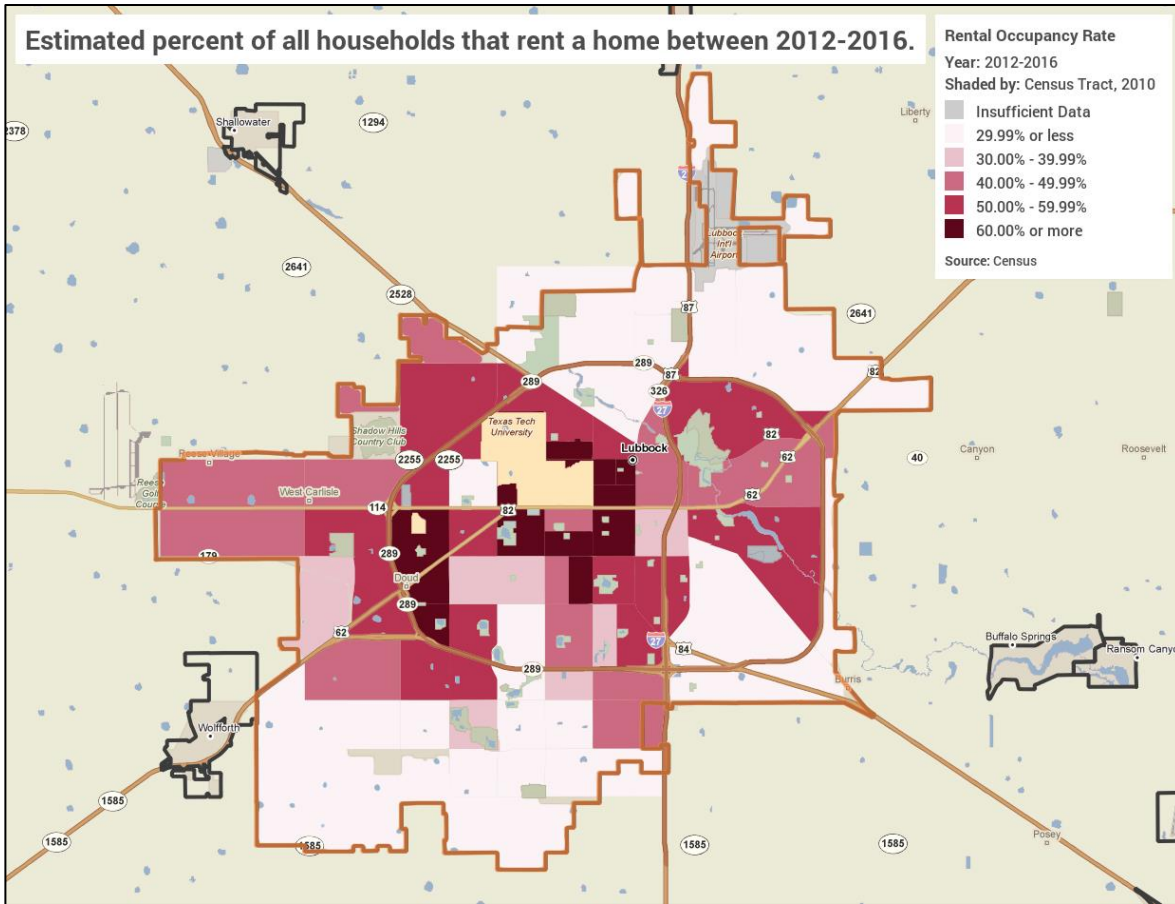
MAP: Owner-occupied Housing



Source: 2012-2016 ACS via PolicyMap

The second map shows renter-occupied housing with the reverse pattern. The areas with a large renter population (over 60%) tend to be around Texas Tech University and are not particularly segregated.

MAP: Renter-occupied Housing



Source: 2012-2016 ACS via PolicyMap

Between 2000 and 2016, the rates of homeownership has decreased slightly throughout the area. Within the City of Lubbock and the tri-county region (Lubbock, Crosby, and Lynn) homeownership has decreased approximately 2-3 percent since 2000.

Table: Percent of Housing Occupied by Renters and Owners

	2000		2010		2016	
	Renter	Owner	Renter	Owner	Renter	Owner
Lubbock, TX (city)	44.2	55.8	45.4	54.6	47.8	52.2
Lubbock County	40.8	59.2	41.8	58.2	43.7	56.3
Crosby County	30.7	69.3	30.7	69.3	32.3	67.7
Lynn County	25.7	74.3	26.8	73.2	29.0	71.0

Source: 2000 Decennial Census DP-1, 2010 Decennial Census DP-1, 2012-2016 ACS 5-Year Estimates B25003

Over the last 16 years the proportion of the population that is cost burdened has increased. Across the area there has been an increase of approximately 10 percent for renter-occupied units, except in Lynn County where the rate has skyrocketed from 16.8 percent to 49.4 percent. Owner-

occupied households have also seen an increase in cost-burden by 5-10 percent throughout the region.

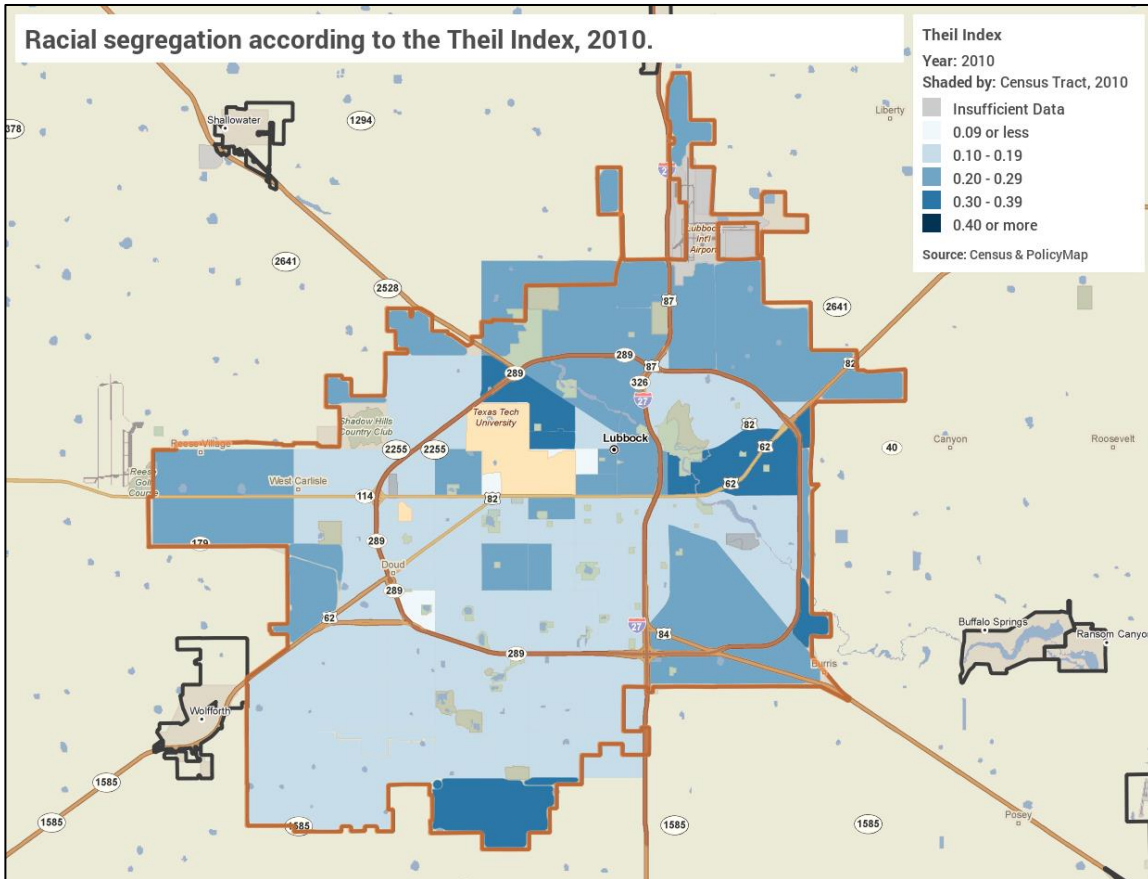
Table: Cost Burdened Households						
	2000		2010		2016	
	Renter	Owner	Renter	Owner	Renter	Owner
Lubbock, TX (city)	44.1	17.8	55.1	27.3	54.5	25.4
Lubbock County	42.7	17.6	54.3	27.3	53.3	24.5
Crosby County	21.7	17.1	46.4	21.0	32.2	26.9
Lynn County	16.8	15.0	42.1	30.7	49.4	27.0
Source: 2000 Decennial Census, 2006-2010 ACS 5-Year Estimates, 2012-2016 ACS 5-Year Estimates (DP04)						

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

Looking at HUD-provided data the demographic trends do not appear to be encouraging greater segregation in the future. There has been growth in the non-White population, but the segregation levels have been declining since 1990. However, the location of publicly supported housing can potentially lead to higher segregation in the future. If publicly supported housing is located primarily in R/ECAP tracts or other tracts with segregated populations, it can reinforce segregation. Local jurisdictions generally have control over where public housing is placed and often higher-income (who are also often White) have a “Not in My Backyard” (NIMBY) view of public housing. It is important that housing assistance is available in all census tracts to provide opportunities outside of segregated areas of the city.

The following map uses the Theil Index to measure racial segregation. Lower values (below .20) are areas of less segregation and higher values (above .40) are areas of more segregation. Throughout the city there are no tracts with high segregation and only two small tracts with low segregation.

MAP: Theil Index



Source: 2010 Census via PolicyMap

2. Additional Information

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

The Texas Fair Housing Act and the United States Fair Housing Act both prohibit housing discrimination based on race, color, religion, sex, national origin, disability, or familial status. Race, color, national origin, disability, and familial status are all discussed throughout this document. There is no additional relevant information that the remaining protected classes (religion and sex) are segregated in the City or Region. The importance of identifying and addressing segregation was noted in the 2014 City of Lubbock Analysis of Impediments to Fair Housing Choice (AI), but segregation in any forms was not identified as an Impediment for the jurisdiction.

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

While segregation was not noted as an issue in the 2014 AI, protected classes were noted as facing additional impediments to fair housing that could impact segregation. Poverty is often linked to race, ethnicity or limited English proficiency, and minority populations tend to have significantly lower median household incomes than White households. To address this issue, the City of Lubbock identified three actions:

1. Provide language assistance to persons with limited English proficiency
2. Continue to Implement an Affirmative Fair Housing Marketing Plan to create fair and open access to affordable housing
3. Continue to encourage recruitment of industry and job creation.

The City recognizes that it is necessary that these programs to not unintentionally encourage segregation by opening access to affordable housing only in areas with large minority populations. Access to homes and economic opportunities for protected classes must exist throughout the city.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

Community opposition to integration is a difficult thing to accurately judge. There are often stereotypes that low-income residents will bring down the property value of a neighborhood and may attract crime. Low-income residents often lack a voice in policy decisions and even when communities recognize the need for publicly supported housing there is a “NIMBY” view of the issue.

Rising housing costs can lead to the **displacement of residents due to economic pressures** and **loss of affordable housing**. As the costs of housing rises, low-income residents are pushed out of the community. This is particularly true for renters who do not see rising housing costs as an increase in value of their investment. When income is linked to race or ethnicity this can lead to racial segregation. The following table displays economic changes in the City over time. Housing costs, rent and the percentage of cost-burdened residents have grown more quickly than median household income. If this pattern is not addressed, more residents may be displaced or face living in substandard housing conditions.

Table: Economic Changes Over Time (Lubbock, TX)			
	2000	2016	Percent Change
Median Gross Rent	514	854	66.2
Median Owner Housing Costs (with Mortgage)	799	1245	55.8
Median Owner Housing Costs (without Mortgage)	275	476	73.1
Home Value	69,500	118,300	70.2
Cost Burdened Renters	44.1	54.5	23.6
Cost Burdened Home Owners	17.8	25.4	42.7
Median Household Income	31,844	45,499	42.9
Source: 2012-2016 American Community Survey 5-Year Estimates, 2000 Decennial Census			

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

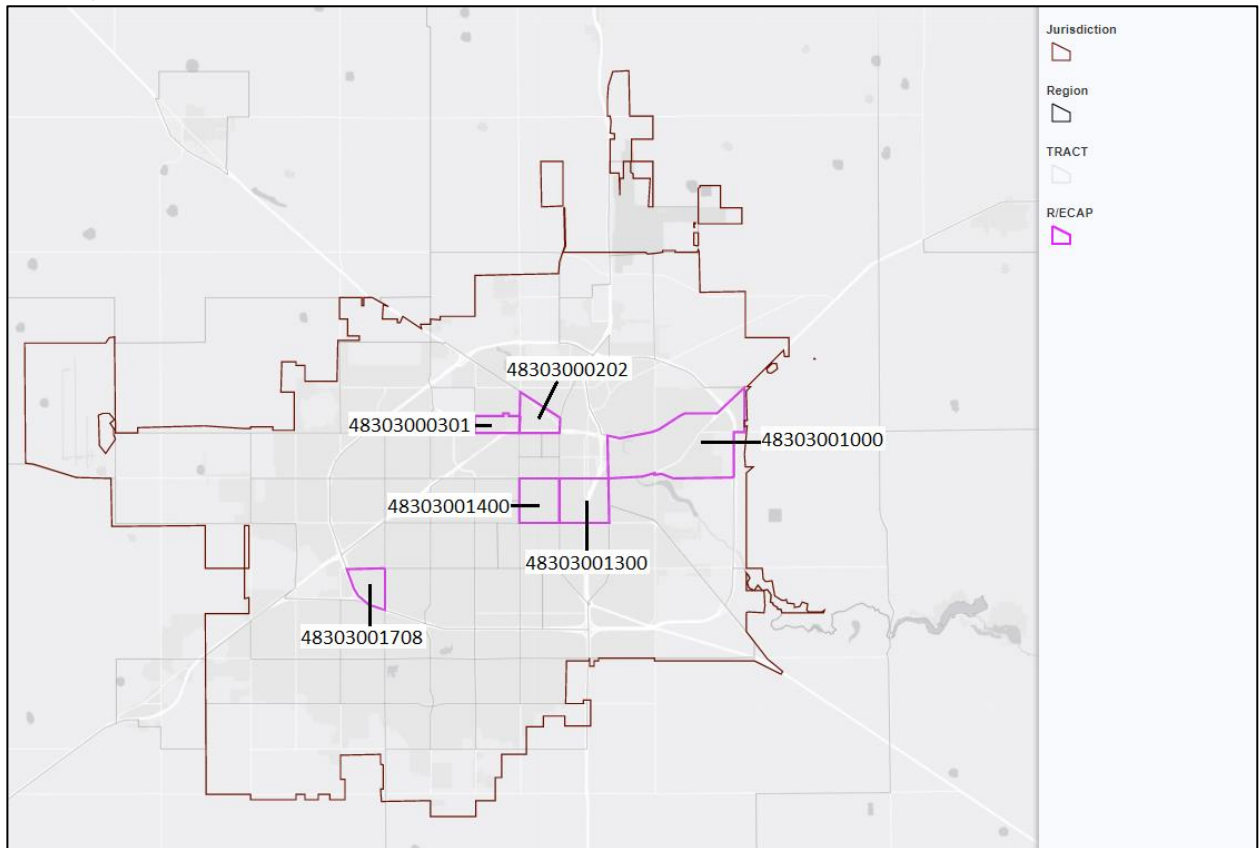
1. Analysis

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

HUD has developed a census tract based, dual threshold definition for R/ECAP to assist identifying racially/ethnically concentrated areas of poverty. The first threshold is that the tract must have a non-White population of 50 percent or more. The second threshold requires either a tract have 40 percent or more of the population living in poverty or three times the average poverty rate for the area, whichever threshold is lower.

According to HUD, there are six census tracts that meet the R/ECAP definition. Five are in the northeastern quadrant of the city and one is in the southwestern quadrant.

MAP: R/ECAP Tracts



Source: Decennial Census, 2010 and 2009-2013 ACS (HUD AFFHT0004)

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

Approximately one-sixth of the population, or nearly 20,000 residents live in R/ECAP tracts. These tracts have disproportionately high Hispanic and Black, non-Hispanic populations. Hispanic residents make up 32.23 percent of the City of Lubbock but over 50 percent of R/ECAP tracts. Black, non-Hispanic residents make up approximately 8 percent of the City but over 12 percent of the R/ECAP tract. Additionally, over 4 percent of the R/ECAP tract identify as Asian while they represent 2.37 percent of the total City population.

	Lubbock, TX (Jurisdiction)		Lubbock, TX (Region)	
	#	%	#	%
R/ECAP Race & Ethnicity				
Total Population in R/ECAPS	19,700	-	19,700	-
White, Non-Hispanic	5,583	28.34%	5,583	28.34%
Black, Non-Hispanic	2,455	12.46%	2,455	12.46%
Hispanic	10,550	53.55%	10,550	53.55%
Asian or Pacific Islander, Non-Hispanic	805	4.09%	805	4.09%
Native American, Non-Hispanic	60	0.30%	60	0.30%
Other, Non-Hispanic	39	0.20%	39	0.20%
R/ECAP Family Type				
Total Families in R/ECAPS	3,929	-	3,929	-
Families with children	1,820	46.32%	1,820	46.32%
Source: 2010 Decennial Census, 2009-2013 ACS (HUD AFFHT0004, Table 4 – R/ECAP Demographics)				

Residents in R/ECAPs are also more likely to be foreign-born than the general population of Lubbock. Nearly 7.5 percent of the R/ECAP population was born in Mexico while only 2.68 percent of the total Lubbock population was from Mexico. Over 2 percent of the R/ECAP population is from India but this group only represents 0.56 percent of Lubbock’s total population. It is important that foreign-born residents have access to housing opportunities throughout the City to prevent segregation and the development of R/ECAPs.

	Lubbock, TX (Jurisdiction)			Lubbock, TX (Region)		
	Nation	#	%	Nation	#	%
Total Population in R/ECAPS		19,700	-		19,700	-
#1 country of origin	Mexico	1,473	7.48%	Mexico	1,473	7.48%
#2 country of origin	India	434	2.20%	India	434	2.20%
#3 country of origin	Other Northern Africa	93	0.47%	Other Northern Africa	93	0.47%
#4 country of origin	Sri Lanka	83	0.42%	Sri Lanka	83	0.42%
#5 country of origin	Philippines	55	0.28%	Philippines	55	0.28%
#6 country of origin	Canada	30	0.15%	Canada	30	0.15%
#7 country of origin	Cuba	28	0.14%	Cuba	28	0.14%

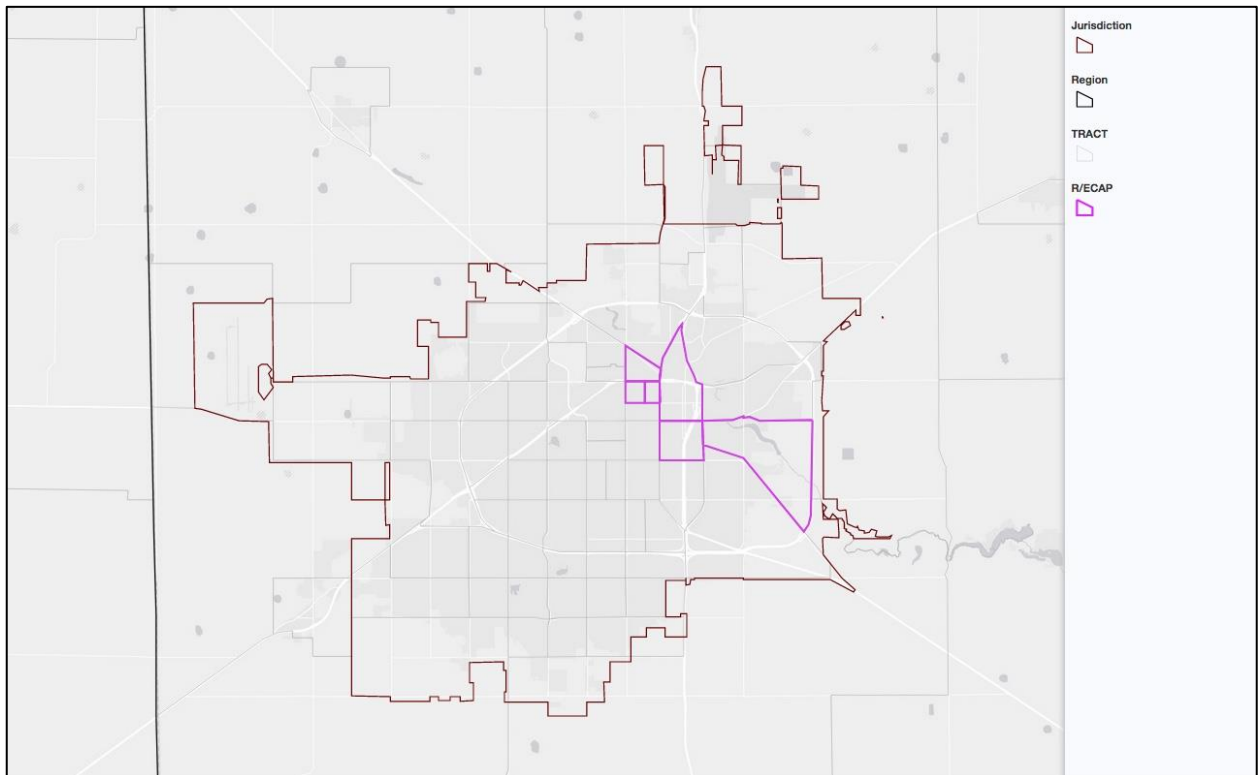
#8 country of origin	Kuwait	23	0.12%	Kuwait	23	0.12%
#9 country of origin	El Salvador	22	0.11%	El Salvador	22	0.11%
#10 country of origin	Iraq	21	0.11%	Iraq	21	0.11%
Source: 2010 Decennial Census, 2009-2013 ACS (HUD AFFHT0004, Table 4 – R/ECAP Demographics)						

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

Within the City of Lubbock R/ECAPs have undergone significant change over time. There is only one tract (which was two separate tracts in 1990) that has consistently remained a R/ECAP since 1990. This tract, 48303000301, is located to the north of 4th Street, east of Indiana Avenue, south of 1st Street, and west of University Avenue.

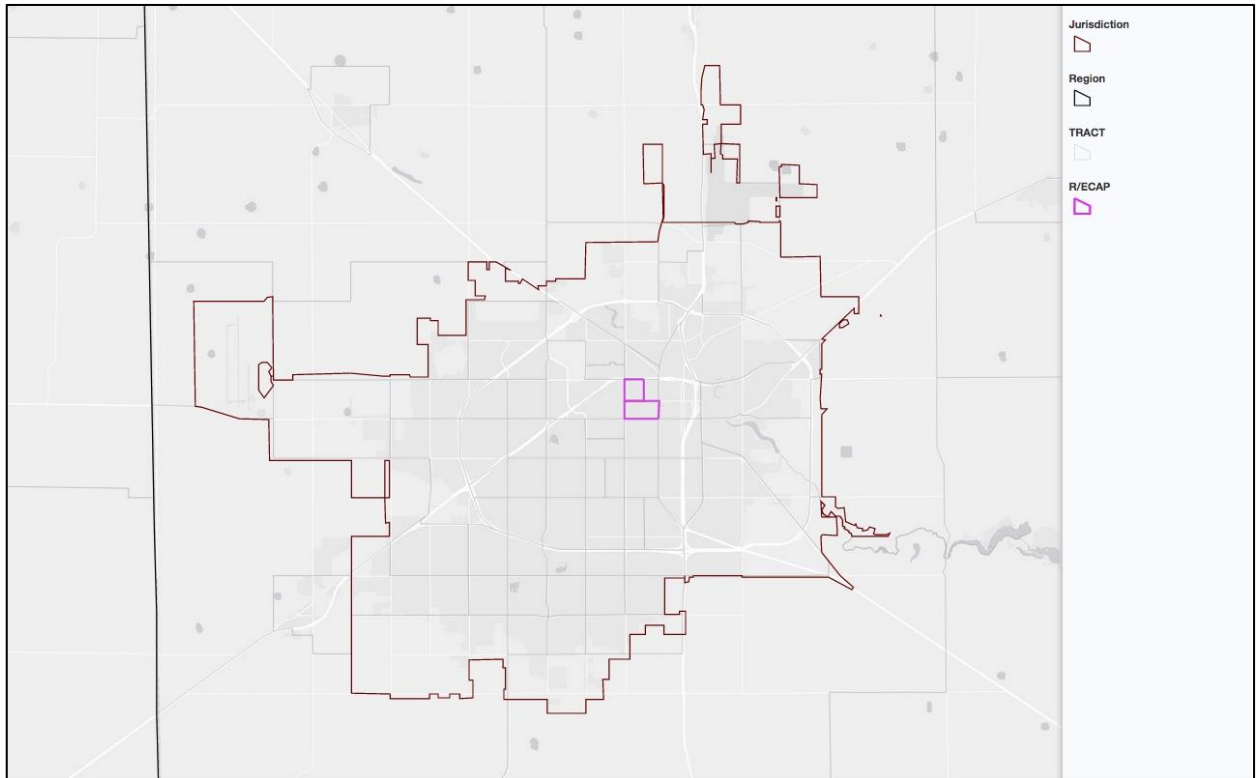
In 1990, there were six R/ECAP tracts, all of which were on the east side of the town. In 2000, only two R/ECAP tracts remained, and they were made up of previous R/ECAP tracts but by 2010 there were again six census tracts identified that were primarily in the eastern part of town. Finally, the most recent data shows six census tracts, one of which is on the western half of town. The following four maps show the location of R/ECAP tracts over time.

MAP: R/ECAP Tracts, 1990



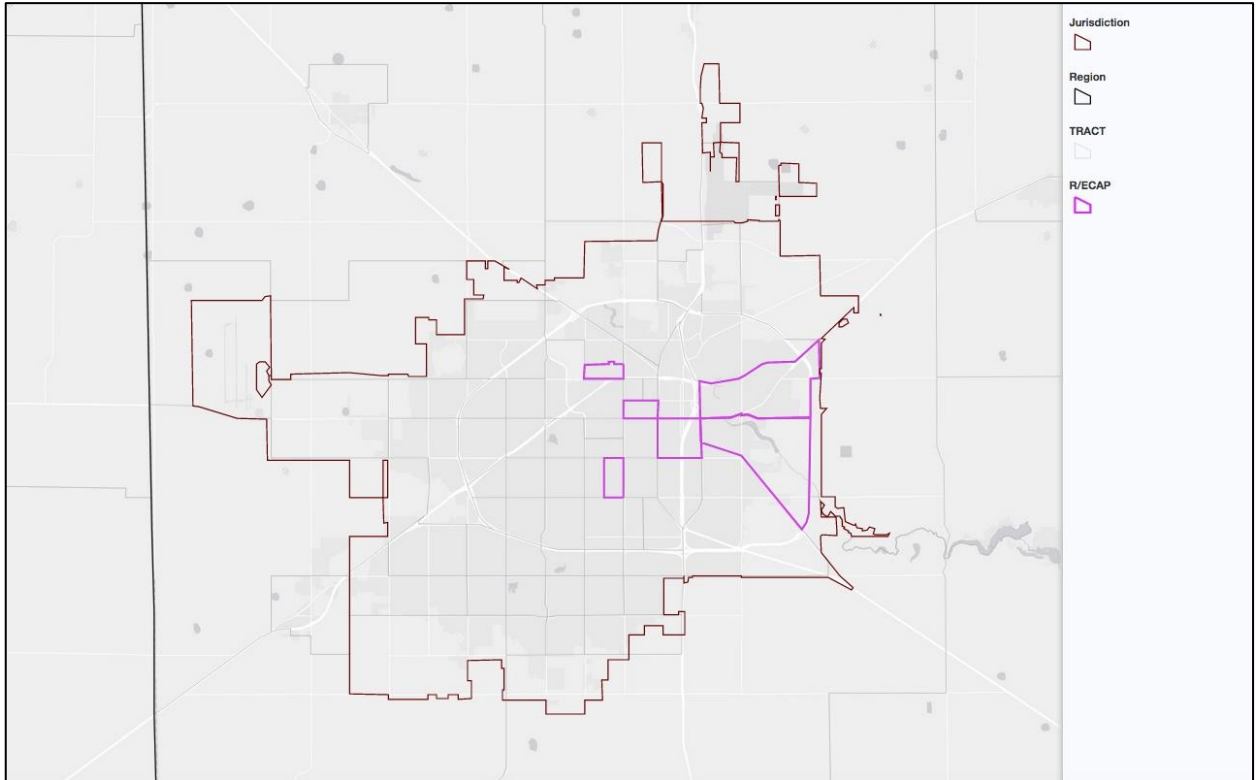
Source: 2009-2013 ACS, Decennial Census (1990, 2000, 2010), Brown Longitudinal Tract Database (HUD AFFHT0004)

MAP: R/ECAP Tracts, 2000



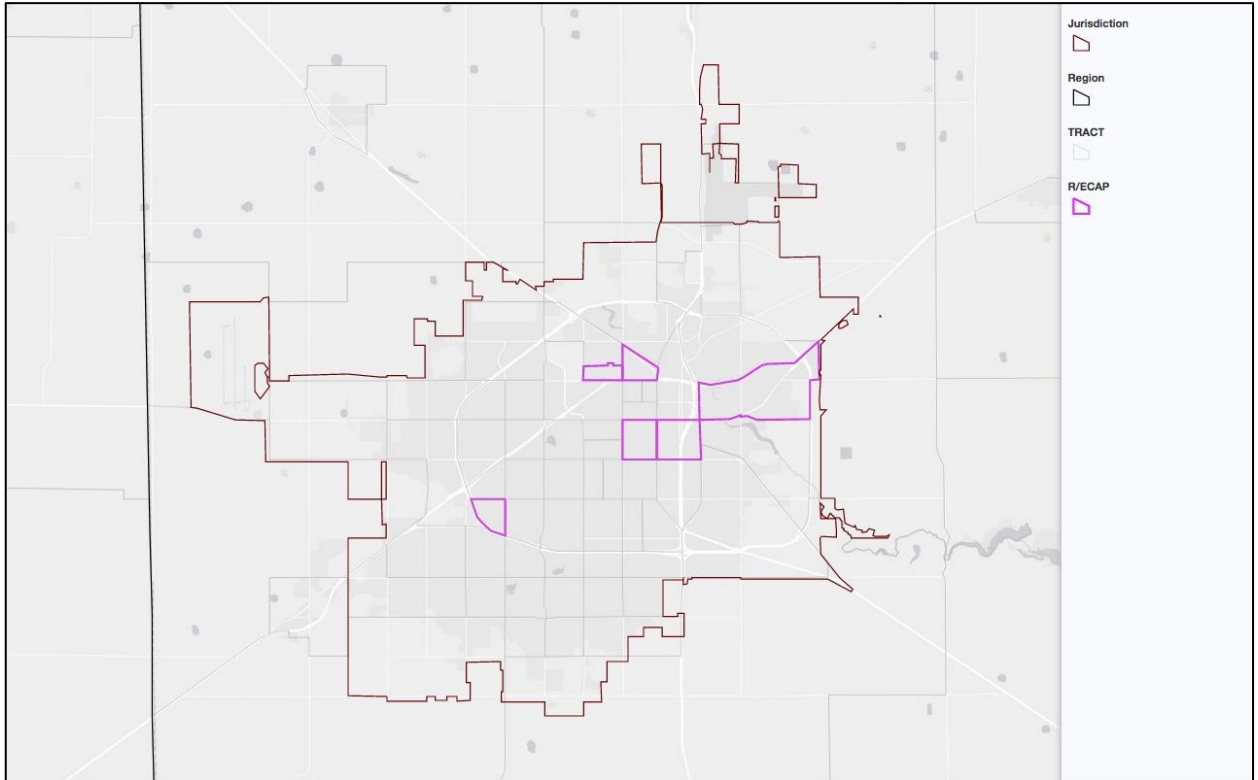
Source: 2009-2013 ACS, Decennial Census (1990, 2000, 2010), Brown Longitudinal Tract Database (HUD AFFHT0004)

MAP: R/ECAP Tracts, 2010



Source: 2009-2013 ACS, Decennial Census (1990, 2000, 2010), Brown Longitudinal Tract Database (HUD AFFHT0004)

MAP: R/ECAP Tracts, Current

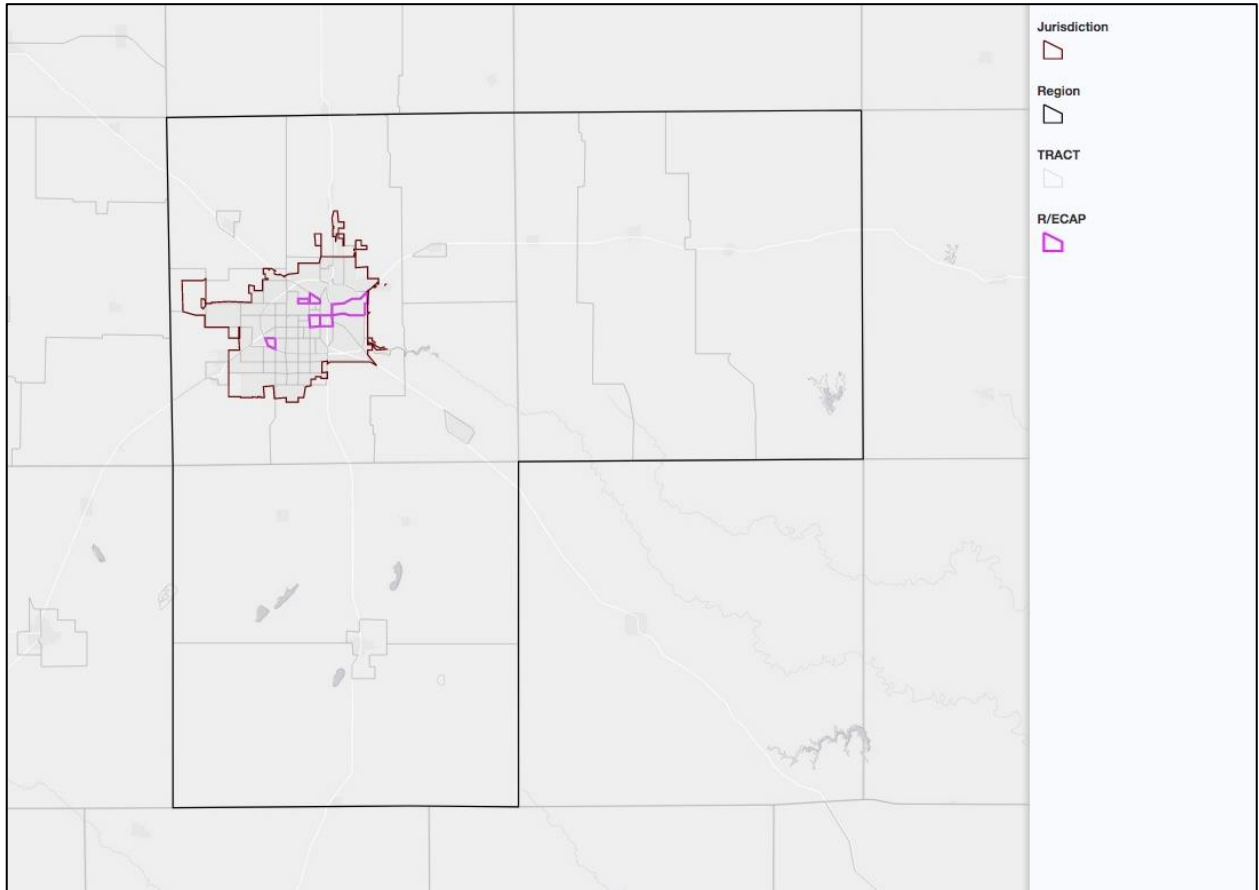


Source: 2009-2013 ACS, Decennial Census (1990, 2000, 2010), Brown Longitudinal Tract Database (HUD AFFHT0004)

R/ECAP Tracts (Region)

There are no additional R/ECAP tracts in the region outside of the City of Lubbock, currently or since 1990.

MAP: R/ECAP Tracts, Current (Region)



Source: 2009-2013 ACS, Decennial Census (1990, 2000, 2010), Brown Longitudinal Tract Database (HUD AFFHT0004)

2. Additional Information

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

The 2012-2016 American Community Survey 5-Year estimates provide a more updated demographic view of the city and R/ECAP tracts. Of note is the relatively high poverty rate in R/ECAP tracts which is between 10-30 percent higher than the city. The R/ECAP tracts have disproportionately large Hispanic populations and one tract (48303001000) has a disproportionately high Black population.

	Poverty Rate		% White Population	% Black Population	% Hispanic Population
Lubbock, TX (city)	20.9%		78.7%	7.9%	34.5%
48303001708	30.9%		85.7%	2.0%	32.1%
48303000301	48.1%		67.5%	6.7%	43.9%
48303000202	42.2%		73.1%	1.6%	91.0%
48303001400	34.4%		77.9%	2.9%	36.8%
48303001300	30.8%		71.3%	2.1%	84.4%
48303001000	33.3%		36.2%	45.5%	42.2%

Source: 2012-2016 ACS via PolicyMap (Census Tracts), 2012-2016 ACS, DP05 (City)

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

Using HUD’s R/ECAP definition and the most recent data four additional census tracts have been identified as potentially R/ECAPs now, or in the near future.

	Poverty Rate	% Non-White Population	% Hispanic Population
48303000603	76.7%	22.7%	13.9%
48303000605	83.0%	19.2%	22.1%
48303000607	44.2%	32.4%	18.3%
48303001502	45.5%	5.1%	10.9%

Source: 2012-2016 ACS via PolicyMap

According to the HUD provided data, there are some publicly supported housing policies that may be encouraging the creation of R/ECAPs. One-third of the project-based Section 8 projects are in one census tract (48303001708) which is a R/ECAP.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

The factors that contribute to R/ECAP tracts are similar to those stated above that may contribute to segregation, though the influence of publicly supported housing may play a greater role.

The expansion of public housing into new areas would help alleviate the segregation found in R/ECAPs but may face significant **community opposition**. The **location and type of affordable housing** available outside the R/ECAPs is important and currently the voucher program seems to be spread throughout the city, though there are pockets of publicly supported housing near R/ECAP tracts.

As mentioned earlier, there is a high potential for **displacement of residents due to economic pressure** out of many neighborhoods and into R/ECAP tracts. The presence of a university can put upward pressure on the housing market as students, who have access to co-signers and disposable income, compete with residents for housing (particularly rental housing). According to the Texas Tech University “2020 Strategic Priorities” the university expects an enrollment growth of at least 2.25% per year. By 2020 there may be over 40,000 students competing for housing in Lubbock and many of these students will be competing with low-income residents for housing.

Disparities in Access to Opportunity

1. Analysis

To analyze and address disparities in access to opportunity, HUD provides seven indices across a variety of subjects by race and poverty status. Each of these indices will be discussed in detail in this section. According to HUD, a higher score on each of the indices is seen as positive and “would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure to harmful toxins).”

Table: Opportunity Indicators by Race/Ethnicity (Lubbock, TX) Jurisdiction							
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	58.53	67.64	67.03	46.08	50.22	50.94	80.67
Black, Non-Hispanic	28.93	31.78	38.78	45.41	48.33	43.46	79.31
Hispanic	37.10	42.60	49.95	46.85	50.91	49.59	77.95
Asian/Pacific Islander	59.89	63.63	65.78	51.49	53.43	49.06	80.37
Native American	50.09	57.45	58.93	45.79	50.68	52.39	79.67
Population Below Federal Poverty Line							
White, Non-Hispanic	48.21	55.93	57.52	51.66	54.67	51.83	78.22
Black, Non-Hispanic	24.93	33.13	38.09	46.87	49.64	43.66	78.39
Hispanic	30.28	34.93	43.76	50.04	52.57	50.16	77.00
Asian/Pacific Islander	51.85	48.38	61.31	61.55	61.45	44.48	79.49
Native American	46.52	61.11	56.16	53.97	58.01	57.67	76.24
Low Poverty Index Source: 2009-2013 American Community Survey 5-Year Estimates School Proficiency Index Source: Great Schools, 2013-2014; Common Core of Data (4th Grade Enrollment & School Addresses), 2013-2014; Maptronics School Attendance Zone database, 2016 Labor Market Engagement Index Source: 2009-2013 American Community Survey 5-Year Estimates Low Transportation Cost Index Source: Location Affordability Index (LAI) data, 2008-2012 Transit Index Source: Location Affordability Index (LAI) data, 2008-2012 Jobs Proximity Index Source: Longitudinal Employer-Household Dynamics (LEHD), 2014 Environmental Health Index Source: National Air Toxics Assessment (NATA) data, 2011 (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)							

a. Education

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

In Lubbock there are two protected classes that have a significant disparity in access to proficient schools. The Black, non-Hispanic and Hispanic populations all scored significantly lower on the School Proficiency Index than the other racial/ethnic groups. These two populations are also the most populous minorities in the City.

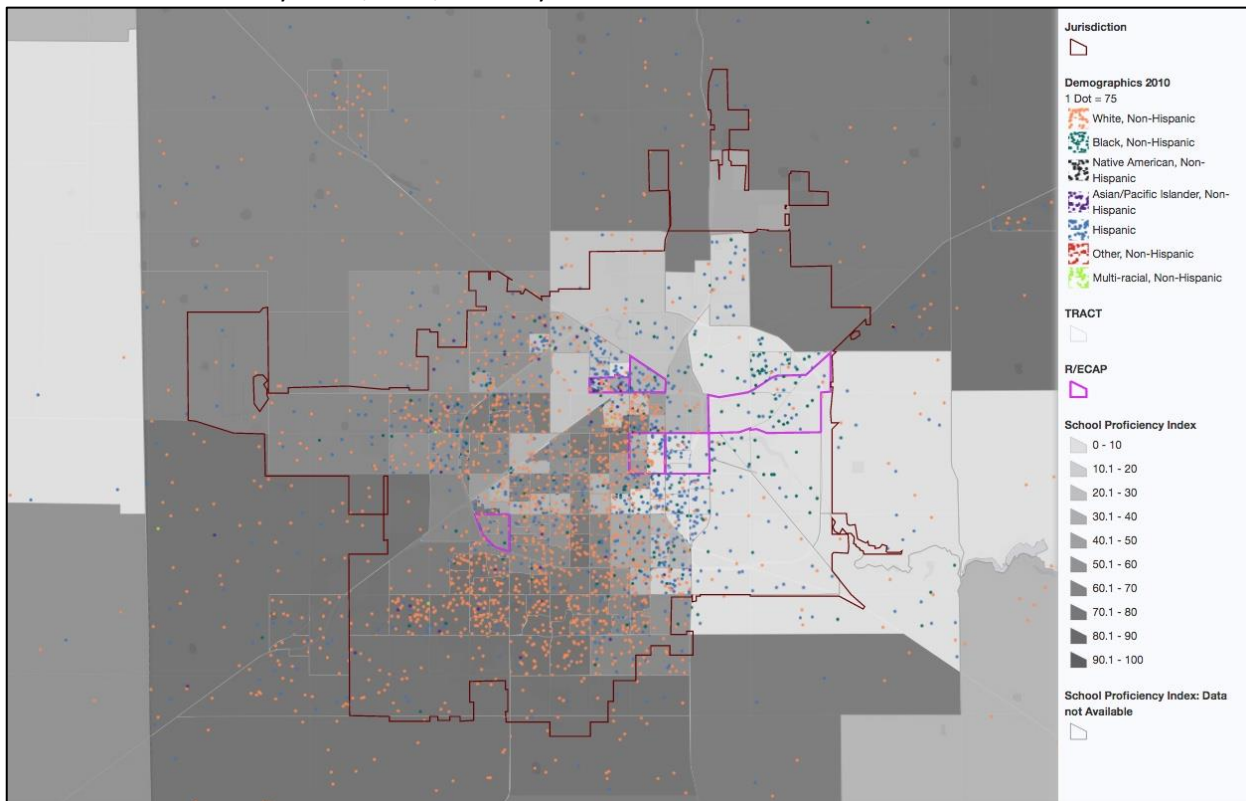
The population below the poverty line in Lubbock also reflects the scores for the total population. The Black, non-Hispanic and Hispanic populations have lower scores that are 20-30 points below the groups with higher scores. The region is very similar to the city, and there is a noticeable disparity in access to proficient schools for the two largest minority populations in the jurisdiction.

Table: Opportunity Indicators by Race/Ethnicity – School Proficiency Index		
	Lubbock, TX (Jurisdiction)	Lubbock, TX (Region)
Total Population		
White, Non-Hispanic	67.64	67.57
Black, Non-Hispanic	31.78	32.68
Hispanic	42.60	45.80
Asian/Pacific Islander	63.63	64.52
Native American	57.45	59.49
Population Below Federal Poverty Line		
White, Non-Hispanic	55.93	56.04
Black, Non-Hispanic	33.13	34.13
Hispanic	34.93	37.87
Asian/Pacific Islander	48.38	49.01
Native American	61.11	59.82
School Proficiency Index Source: Great Schools, 2013-2014; Common Core of Data (4th Grade Enrollment & School Addresses), 2013-2014; Maptronics School Attendance Zone database, 2016 (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)		

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

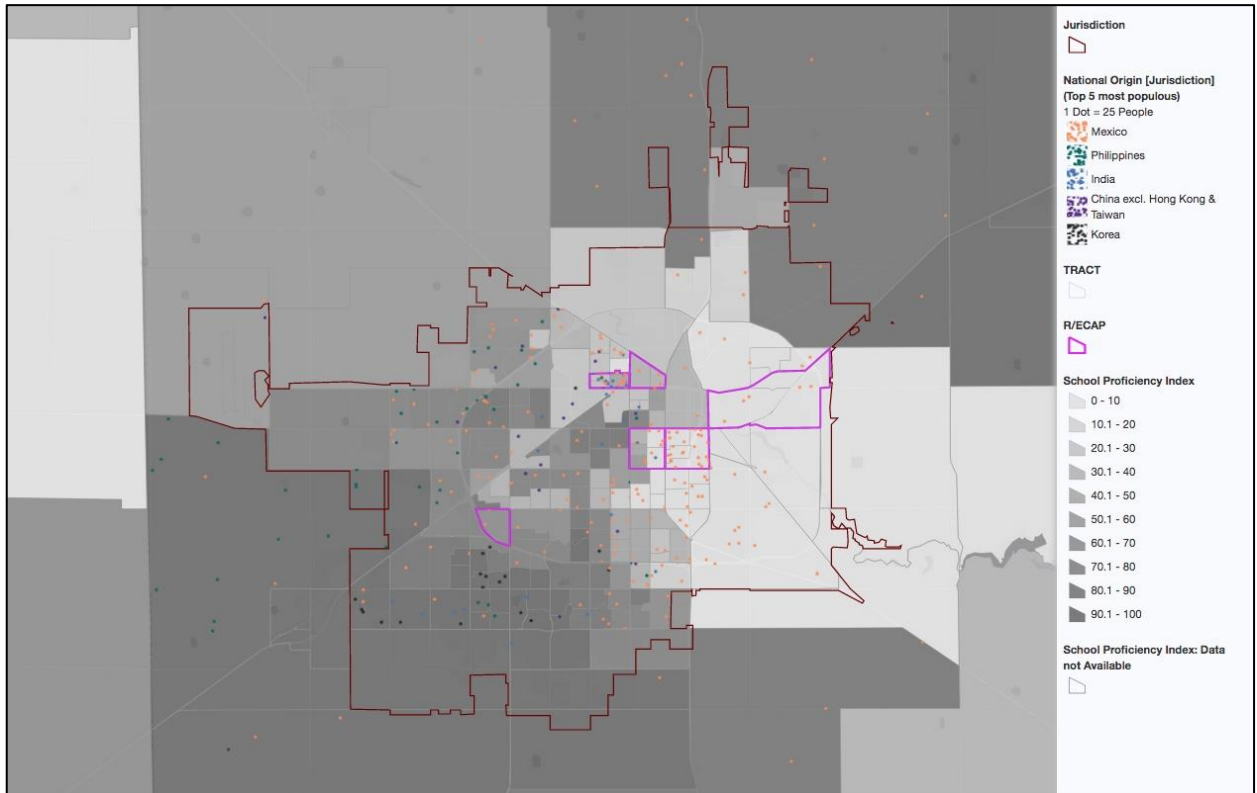
School proficiency is heavily related to residential living patterns. The eastern part of the city has significantly lower School Proficiency Index scores than the western half, particularly the southwestern corner. The areas with high School Proficiency scores have a relatively high White, non-Hispanic population and the areas with low scores have several R/ECAPs and relatively high Hispanic and Black, non-Hispanic populations. A similar pattern exists for foreign-born residents, particularly residents from Mexico who are more likely to live in the tracts with a low School Proficiency scores.

MAP: School Proficiency Index, Race/Ethnicity



Source: Great Schools, 2013-2014; Common Core of Data (4th Grade Enrollment & School Addresses), 2013-2014; Maptronics School Attendance Zone database, 2016 (HUD AFFHT0004)

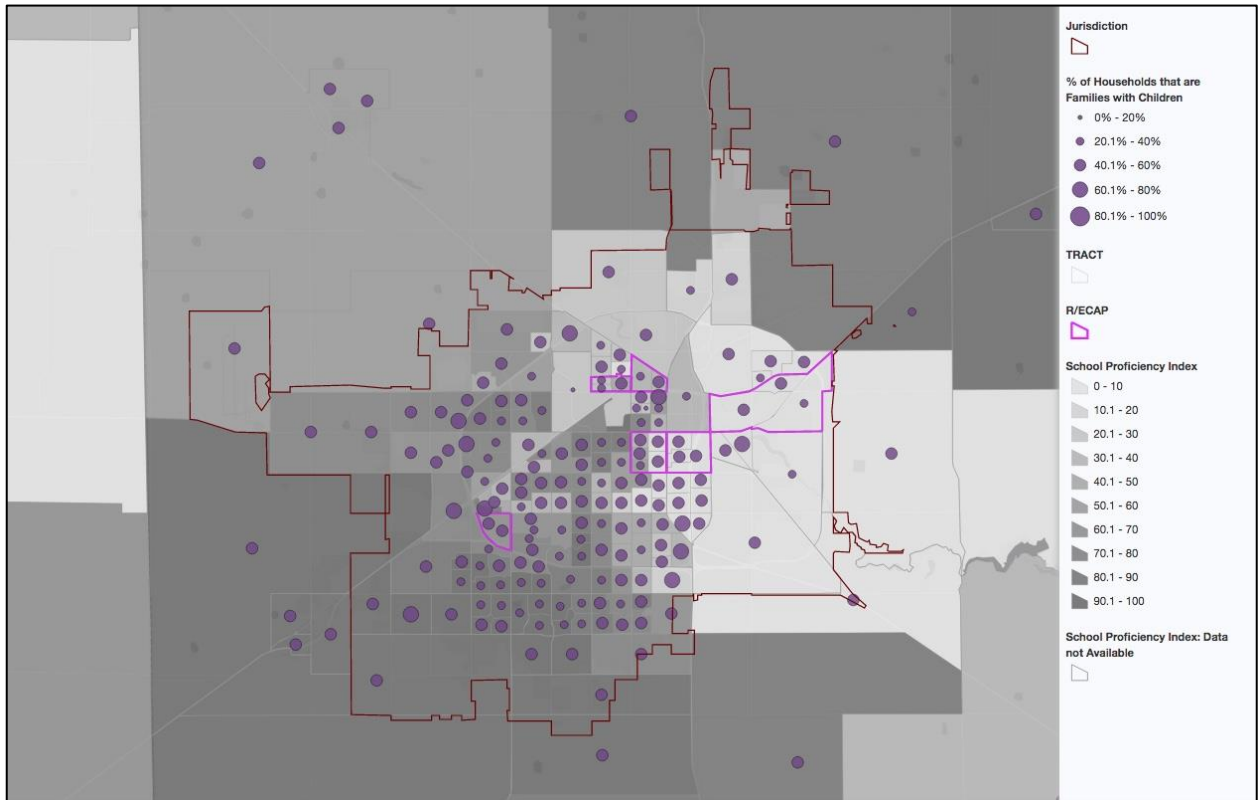
MAP: School Proficiency Index, National Origin



Source: Great Schools, 2013-2014; Common Core of Data (4th Grade Enrollment & School Addresses), 2013-2014; Maptronics School Attendance Zone database, 2016 (HUD AFFHT0004)

HUD also provides information on School Proficiency and Family Type. There does not appear to be a clear relationship between residential living patterns, school proficiency, and family type.

MAP: School Proficiency Index, Family Status

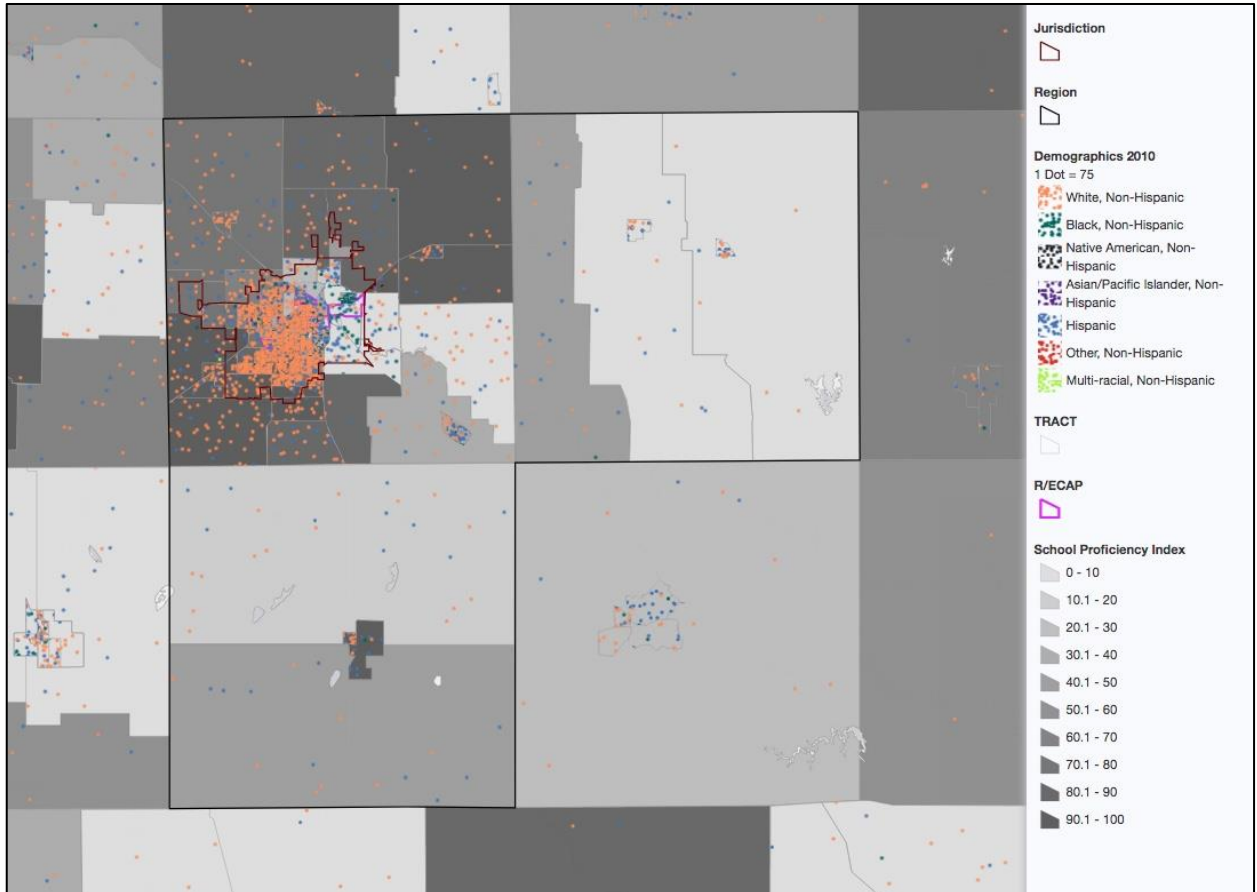


Source: Great Schools, 2013-2014; Common Core of Data (4th Grade Enrollment & School Addresses), 2013-2014; Maptronics School Attendance Zone database, 2016 (HUD AFFHT0004)

School Proficiency (Region)

School proficiency at the regional level does not seem to be related to race and residential patterns. Instead, stronger schools appear to be closer to urban centers while rural tracts have lower School Proficiency scores.

MAP: School Proficiency Index, Race/Ethnicity (Region)



Source: Great Schools, 2013-2014; Common Core of Data (4th Grade Enrollment & School Addresses), 2013-2014; Maptronics School Attendance Zone database, 2016 (HUD AFFHT0004)

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

No concerns were raised in the focus groups about lack of access to proficient schools.

b. Employment

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

Access to employment opportunities is analyzed using two indices: The Labor Market Index and the Jobs Proximity Index. The Labor Market Index is a measure of unemployment rate, labor-force participation rate, and the percent of the population over the age of 25 with a Bachelor’s degree. The Jobs Proximity Index measures the physical distance between where someone lives and their jobs. In both cases scores are broken down by race/ethnicity.

The Labor Market Index shows a disparity in access to labor markets based on race or ethnicity. Again, the Black, non-Hispanic and Hispanic populations have disproportionately low scores. This means they are less likely to be involved in the labor market or have college degrees. The Jobs Proximity Index does not show much variety based on race or ethnicity. The Black, non-Hispanic population has the lowest score, but the difference is only approximately 10 points below the highest score (Native American). This seems to imply that the entire Lubbock population lives near jobs, but there is something preventing Hispanic and Black, non-Hispanic residents from accessing these jobs.

The population below the poverty line in Lubbock has very similar scores to the total population. Again, the Black, non-Hispanic population and Hispanic population have disproportionately low scores in the Labor Market index. The same pattern is present in the region with relatively low scores for these two minority populations.

For the Jobs Proximity Index, the scores are relatively uniform for all populations measured by HUD. The total City, City population below the poverty level, total region, and region below the poverty level all have scores near 50 for all ethnic and racial groups.

	Lubbock, TX (Jurisdiction)	Lubbock, TX (Region)
Total Population		
White, Non-Hispanic	67.03	63.94
Black, Non-Hispanic	38.78	38.99
Hispanic	49.95	49.23
Asian/Pacific Islander	65.78	65.94
Native American	58.93	57.02
Population Below Federal Poverty Line		
White, Non-Hispanic	57.52	56.51
Black, Non-Hispanic	38.09	38.46
Hispanic	43.76	44.32
Asian/Pacific Islander	61.31	61.40
Native American	56.16	52.14
Labor Market Engagement Index Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)		

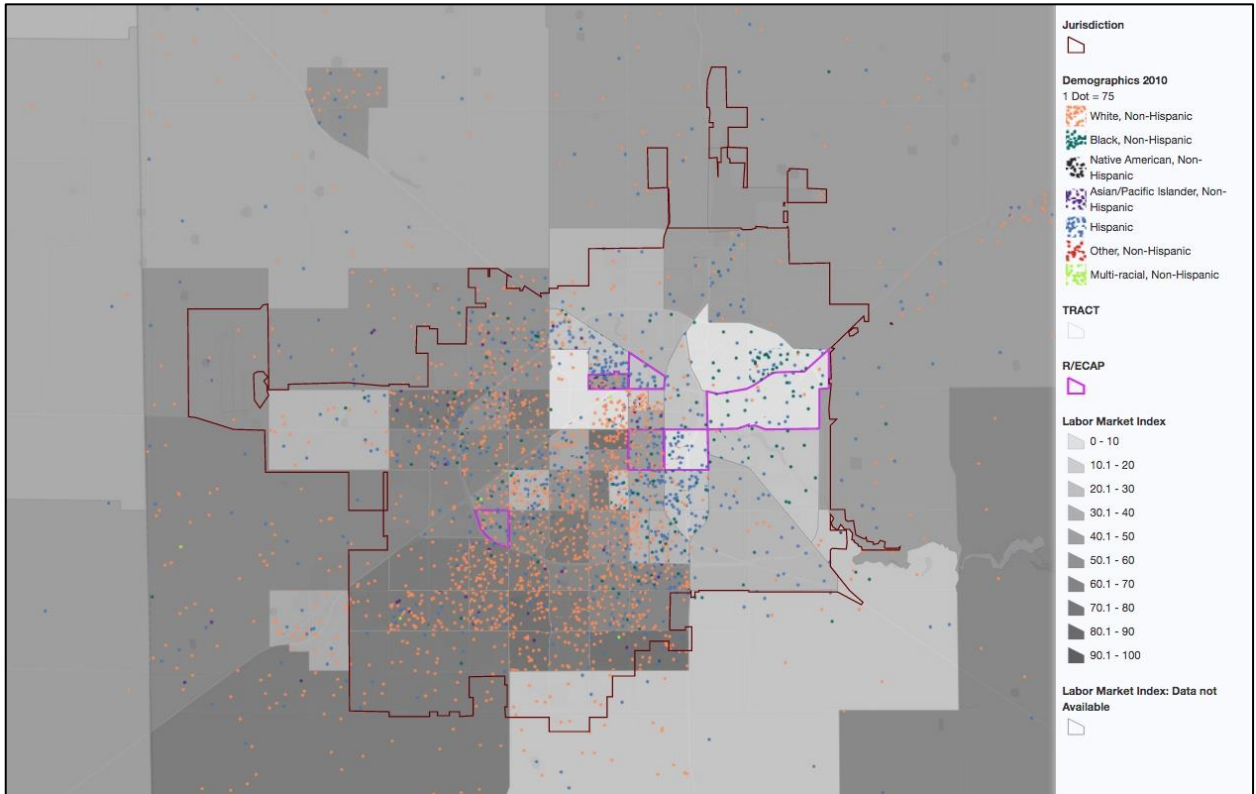
Table: Opportunity Indicators by Race/Ethnicity – Jobs Proximity Index		
	Lubbock, TX (Jurisdiction)	Lubbock, TX (Region)
Total Population		
White, Non-Hispanic	50.94	51.06
Black, Non-Hispanic	43.46	43.34
Hispanic	49.59	49.62
Asian/Pacific Islander	49.06	49.07
Native American	52.39	52.25
Population Below Federal Poverty Line		
White, Non-Hispanic	51.83	49.85
Black, Non-Hispanic	43.66	43.77
Hispanic	50.16	46.94
Asian/Pacific Islander	44.48	44.76
Native American	57.67	55.15
Jobs Proximity Index Source: Longitudinal Employer-Household Dynamics (LEHD), 2014 (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)		

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

Labor Market Index

Residents who live in the southwestern quadrant of the city have significantly higher Labor Market Index scores. The opposite is true for residents living in the northeastern quadrant where scores are disproportionately low. As mentioned before, the eastern part of town tends to have larger Hispanic and Black, non-Hispanic populations.

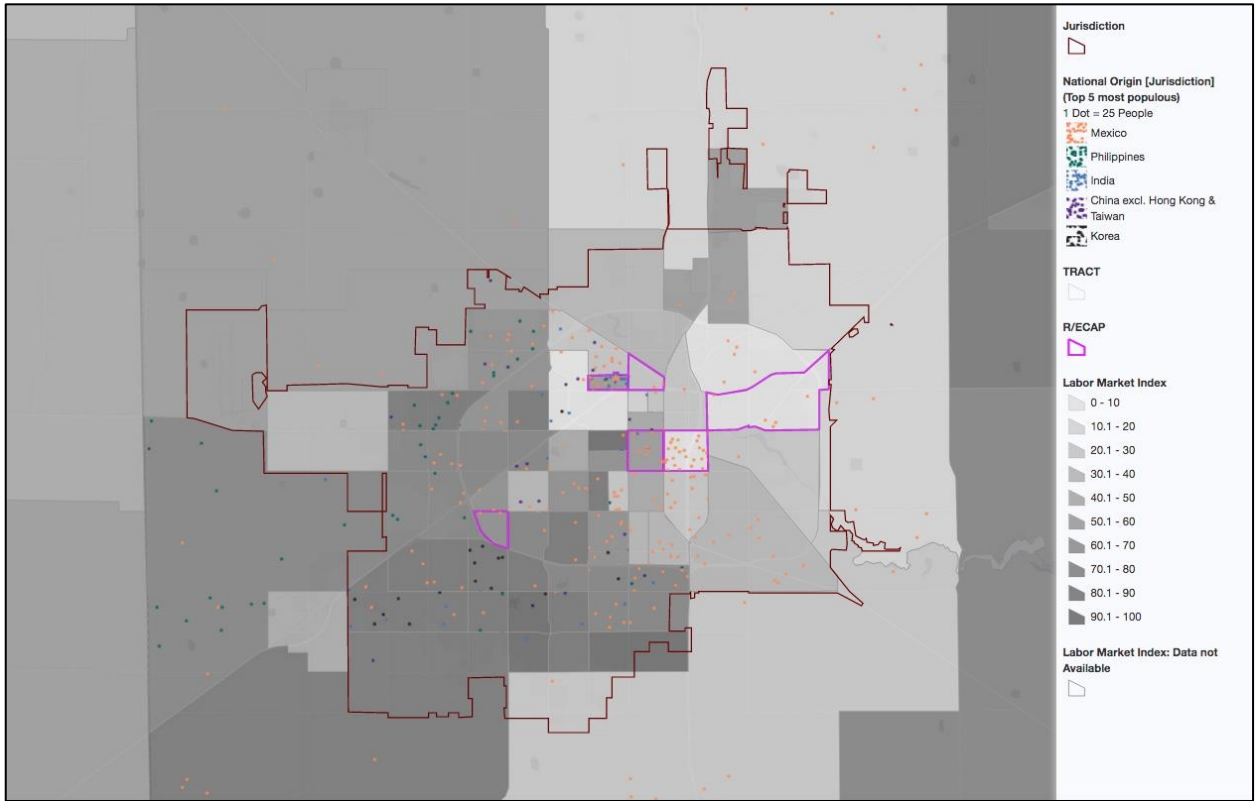
MAP: Labor Market Index, Race/Ethnicity



Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

The only foreign-born population that appears to be affected by the low Labor Market index scores are those born in Mexico. The Mexico-born population tends to live in census tracts on the eastern part of the City near R/ECAP tracts.

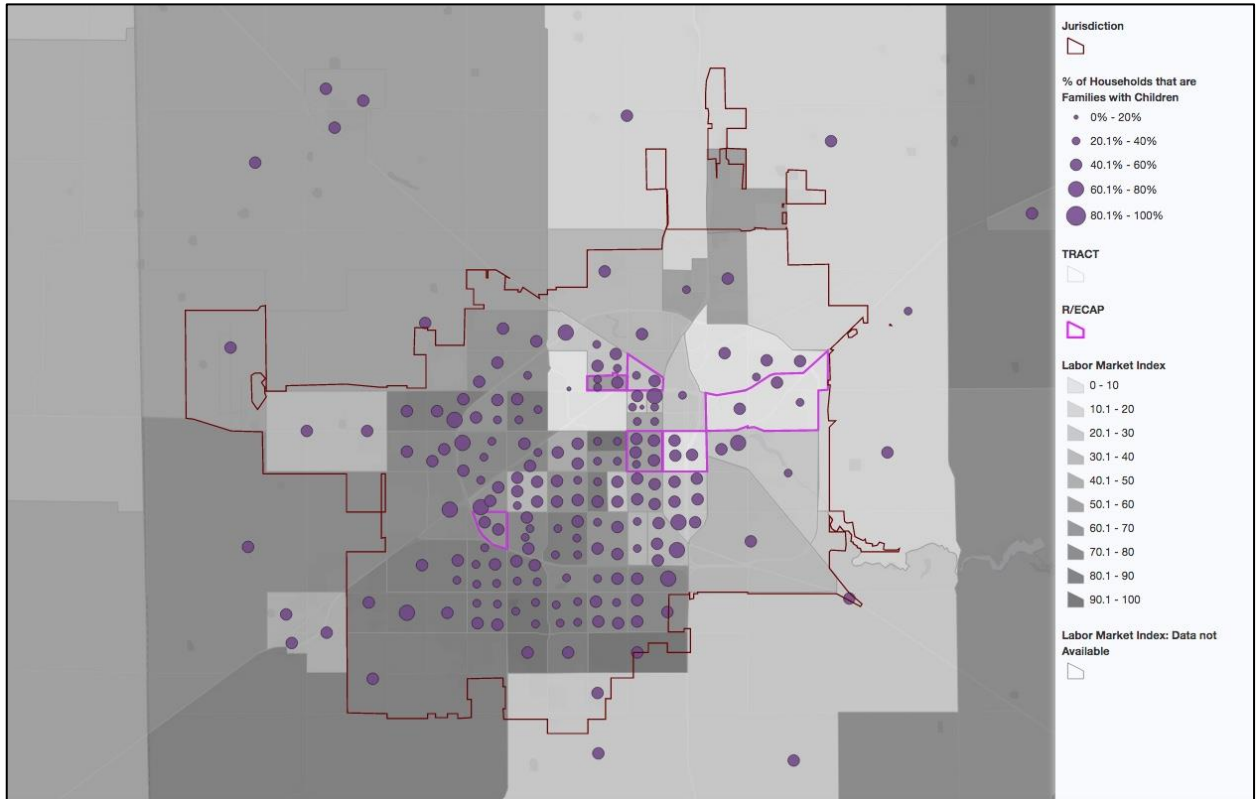
MAP: Labor Market Index, National Origin



Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

There does not appear to be a link between living patterns, labor market index scores, and household type.

MAP: Labor Market Index, Family Status

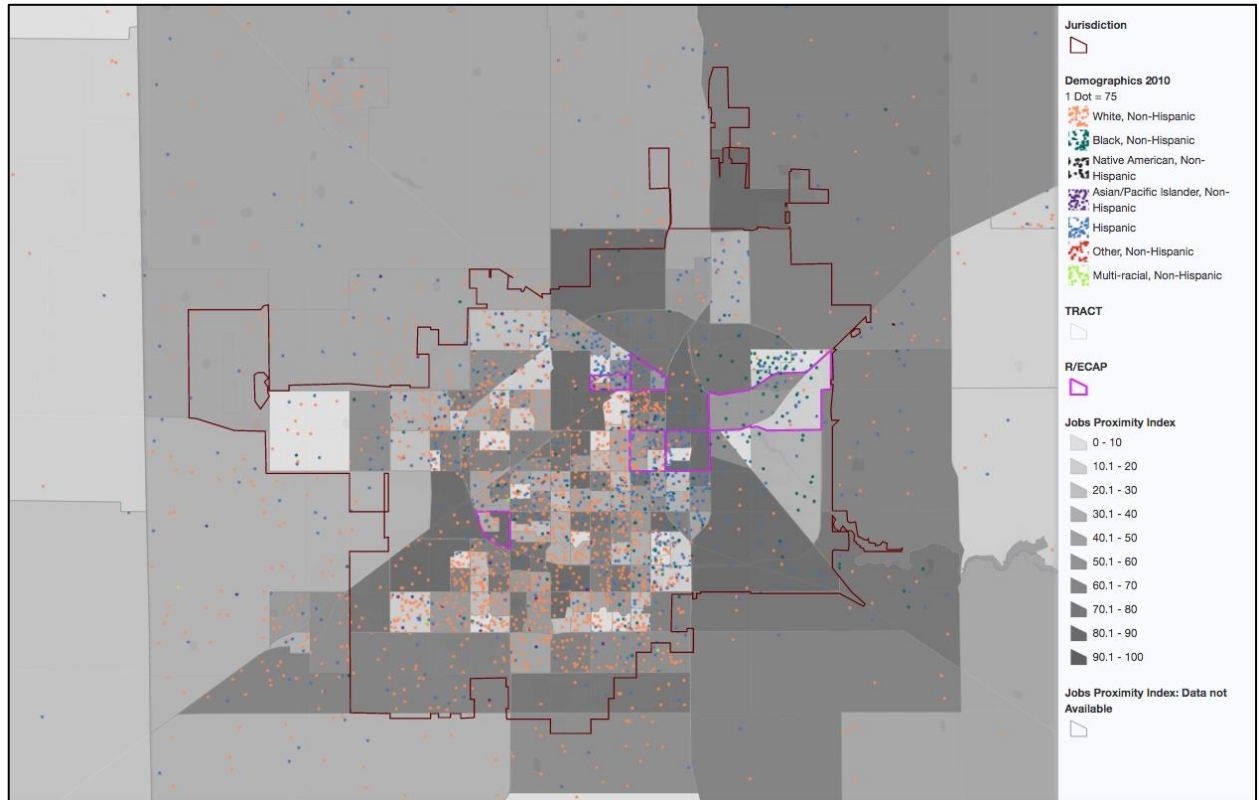


Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

Jobs Proximity Index

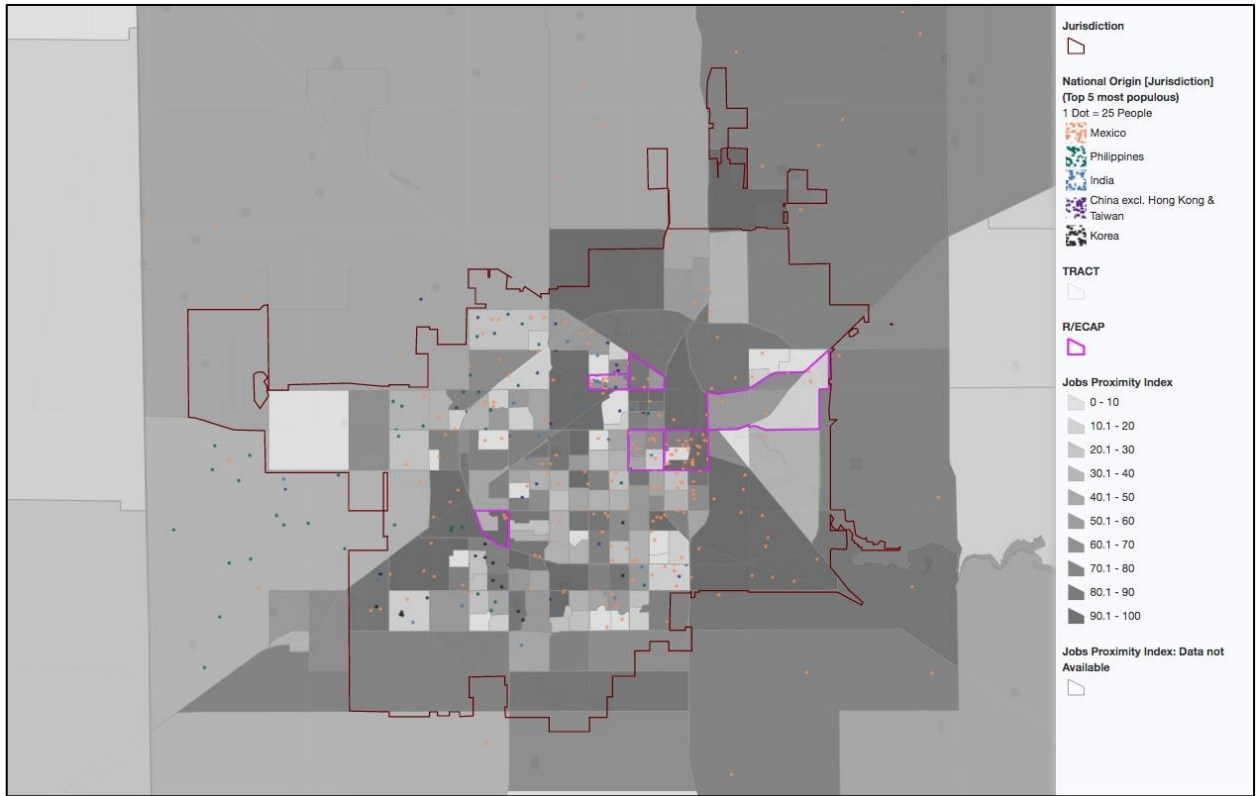
The Jobs Proximity Index map shows that access to jobs is not nearly as concentrated as the Labor Market index. Tracts with high and low scores are present in all areas of the City. Residential living patterns are not associated with this index score for race, ethnicity, national origin, or family type.

MAP: Jobs Proximity Index, Race/Ethnicity



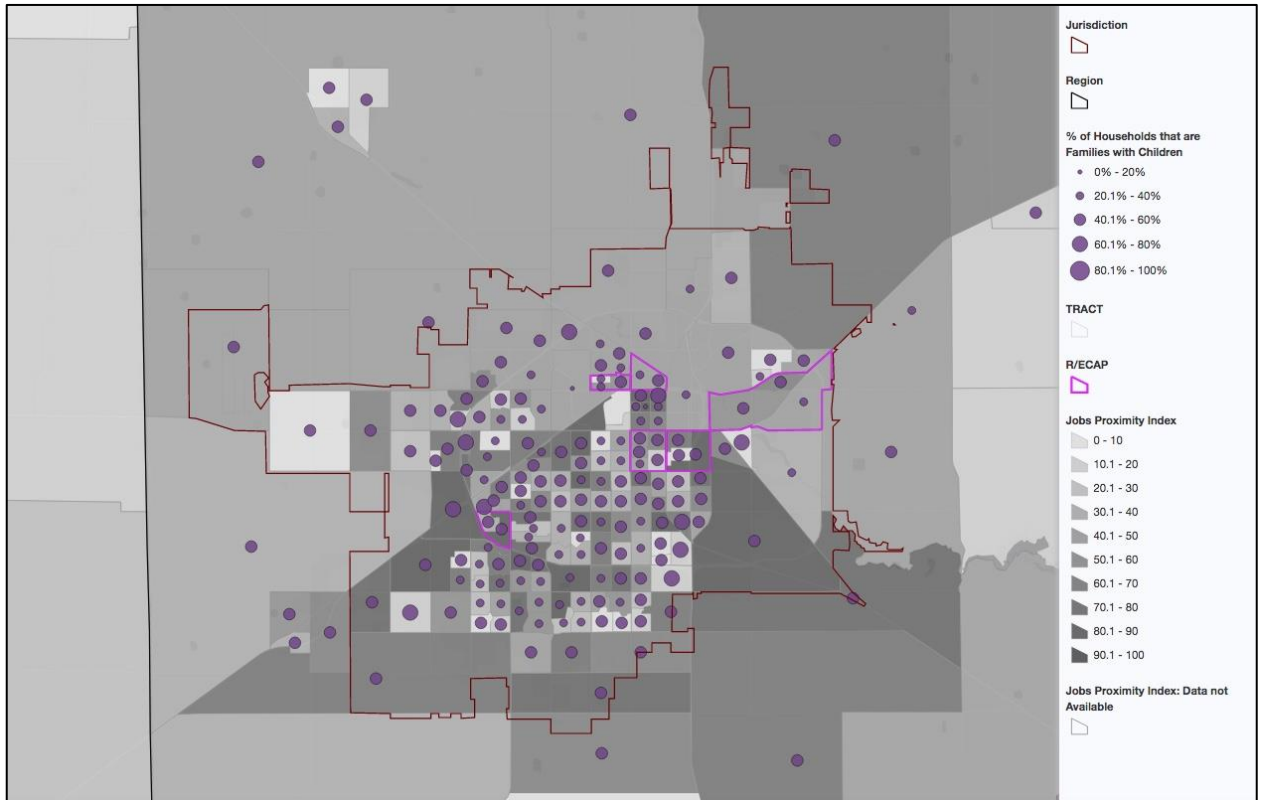
Source: Longitudinal Employer-Household Dynamics (LEHD), 2014 (HUD AFFHT0004)

MAP: Jobs Proximity Index, National Origin



Source: Longitudinal Employer-Household Dynamics (LEHD), 2014 (HUD AFFHT0004)

MAP: Jobs Proximity Index, Family Status

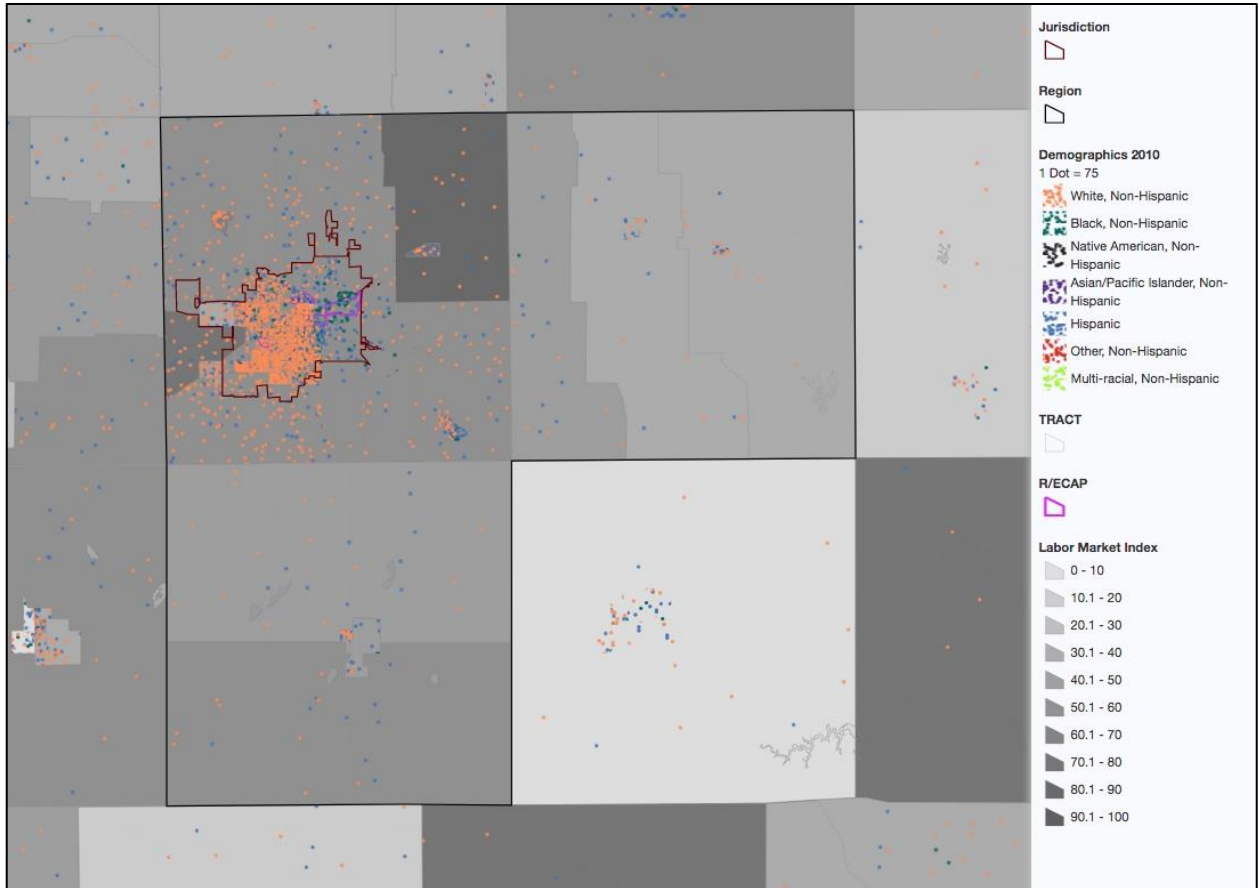


Source: Longitudinal Employer-Household Dynamics (LEHD), 2014 (HUD AFFHT0004)

Labor Market Index (Region)

The Lubbock Region has a variety of Labor Market Index scores by Census Tract. The two tracts with the highest score are outside the City of Lubbock. Generally, rural tracts have slightly lower scores for the Labor Market Index than tracts closer to the City.

MAP: Labor Market Index, Race/Ethnicity (Region)

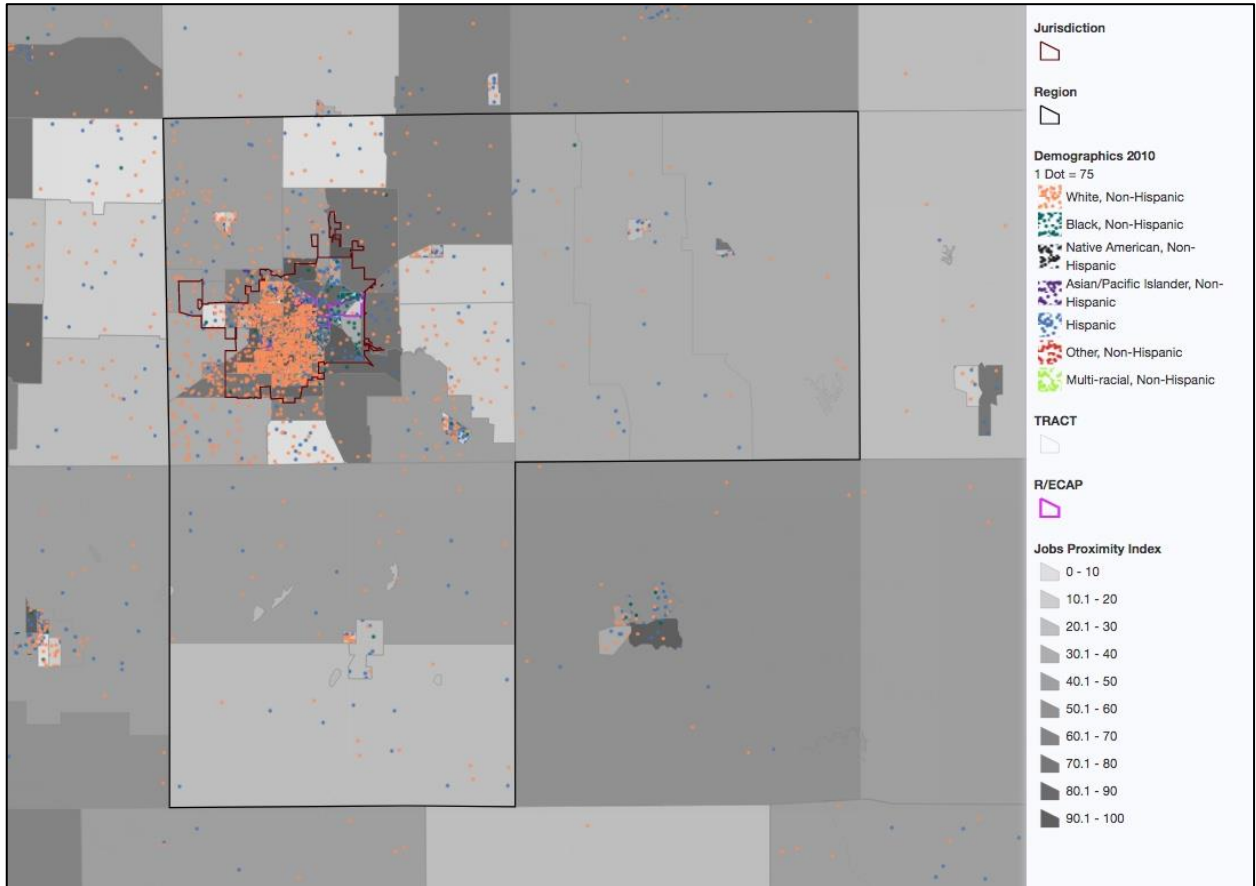


Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

Jobs Proximity Index (Region)

Unsurprisingly, the Jobs Proximity Index scores tend to be higher near the Lubbock Urban Center. Race and Ethnicity do not seem to be linked to Jobs Proximity at the regional level.

MAP: Jobs Proximity Index, Race/Ethnicity (Region)



Source: Longitudinal Employer-Household Dynamics (LEHD), 2014 (HUD AFFHT0004)

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

The biggest disparity in access to employment relates to high cost housing in areas where the most jobs are located coupled with a lack of sufficient and accessible public transportation.

c. Transportation

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

Disparities in access to transportation is measured using two indices, the Transit Index and Low Transportation Cost Index. The Transit Index measures how often low-income families use public transportation and the Low Transportation Cost Index measures the cost of transportation and proximity to public transportation.

According to the Transit Index there is very little disparity in access to transportation based on race or ethnicity for the total population in Lubbock. The difference between the group with the lowest score (Black, non-Hispanic) and highest score (Asian/Pacific Islander) is approximately six points. The scores themselves are not particularly strong but there is relative equality among the population for this index.

There are similar uniform scores for the other populations tracked by HUD. The population below the poverty level in Lubbock all had scores within 15 points of each other, with the Black, non-Hispanic population having the lowest score. For the region, all scores were within 10 points of each other for the total population and ten points of each other for the population below the poverty level.

Table: Opportunity Indicators by Race/Ethnicity – Transit Index		
	Lubbock, TX (Jurisdiction)	Lubbock, TX (Region)
Total Population		
White, Non-Hispanic	46.08	38.34
Black, Non-Hispanic	45.41	43.04
Hispanic	46.85	39.58
Asian/Pacific Islander	51.49	48.51
Native American	45.79	38.71
Population Below Federal Poverty Line		
White, Non-Hispanic	51.66	46.03
Black, Non-Hispanic	46.87	45.42
Hispanic	50.04	42.47
Asian/Pacific Islander	61.55	59.10
Native American	53.97	48.11
Transit Index Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)		

The Low Transportation Cost also shows a relatively small disparity in access to transportation based on race or ethnicity. The population with the lowest score (Black, non-Hispanic) is only five points lower than the group with the highest score (Asian/Pacific Islander). While it is a positive sign that the scores are very similar, the fact that the same population has the lowest score in both indices points to a potential problem that should be investigated.

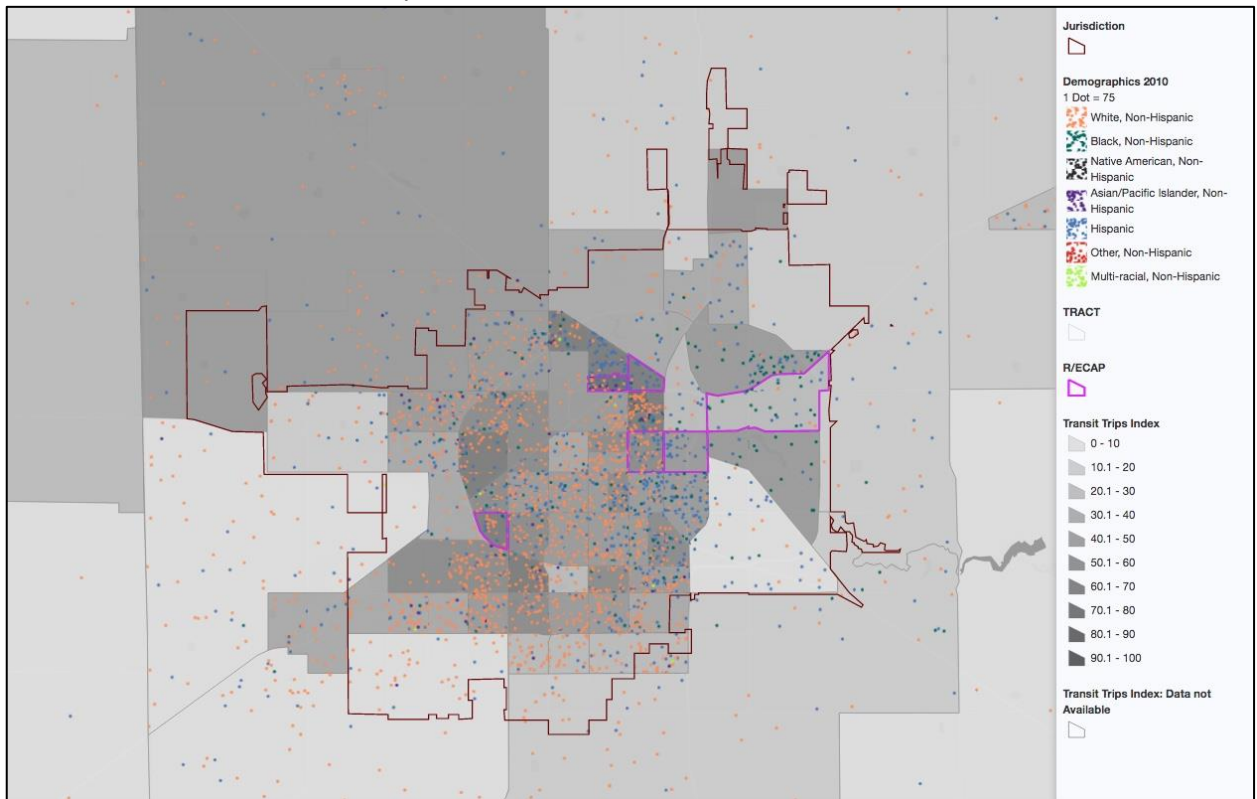
Table: Opportunity Indicators by Race/Ethnicity – Low Transportation Cost Index		
	Lubbock, TX (Jurisdiction)	Lubbock, TX (Region)
Total Population		
White, Non-Hispanic	50.22	43.71
Black, Non-Hispanic	48.33	46.23
Hispanic	50.91	44.13
Asian/Pacific Islander	53.43	51.63
Native American	50.68	44.78
Population Below Federal Poverty Line		
White, Non-Hispanic	54.67	49.82
Black, Non-Hispanic	49.64	48.26
Hispanic	52.57	45.59
Asian/Pacific Islander	61.45	59.99
Native American	58.01	51.93
Low Transportation Cost Index Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)		

- ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

Transit Index

Within the City of Lubbock, there is a relationship between residential living patterns and the Transit Index score. Residents who live closer to downtown have consistently higher scores on this index while those who live in the suburban and rural tracts have lower scores. There is not a strong link specifically between race and access to transportation but many tracts on the eastern part of the City have both relatively high Black, non-Hispanic populations and low transit index scores.

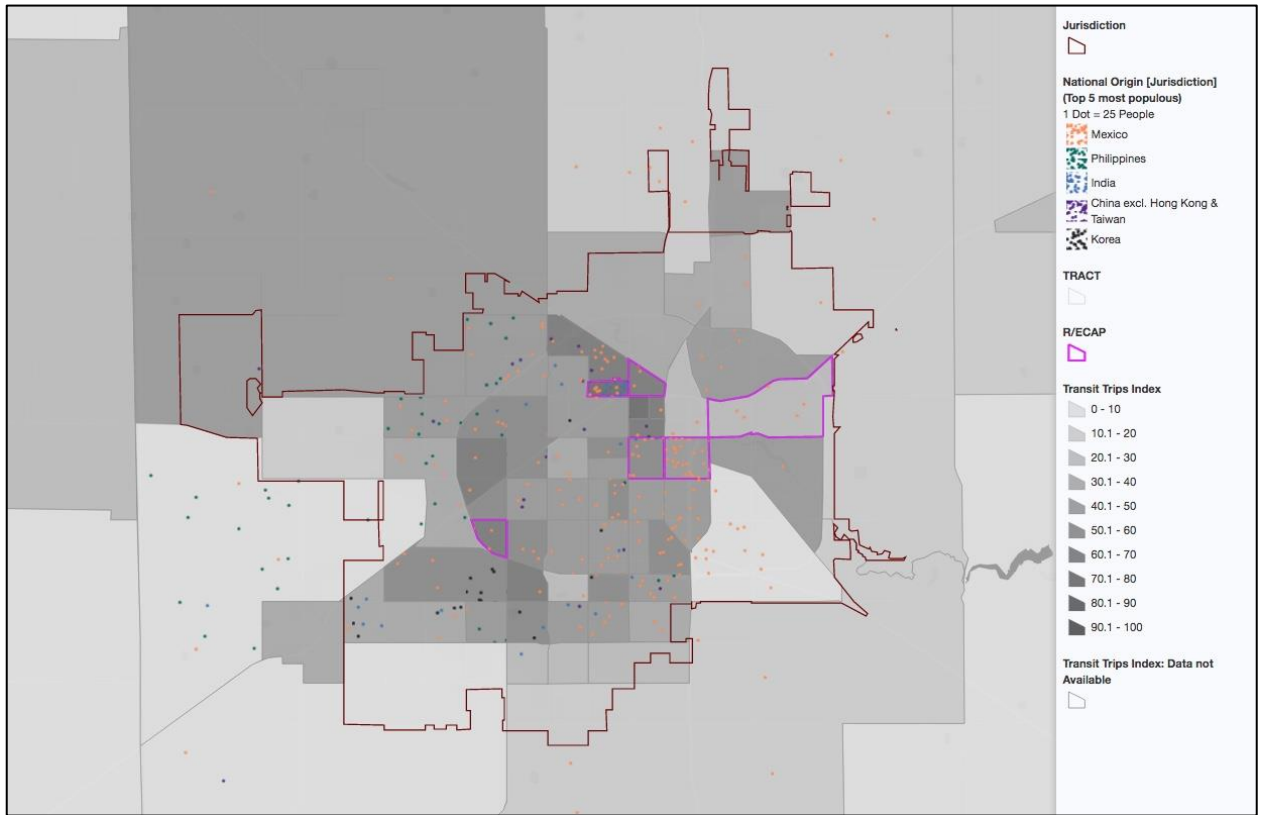
MAP: Transit Index, Race/Ethnicity



Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

There is no apparent disparity in access to transportation by residential living patterns, national origin, and the Transit Index.

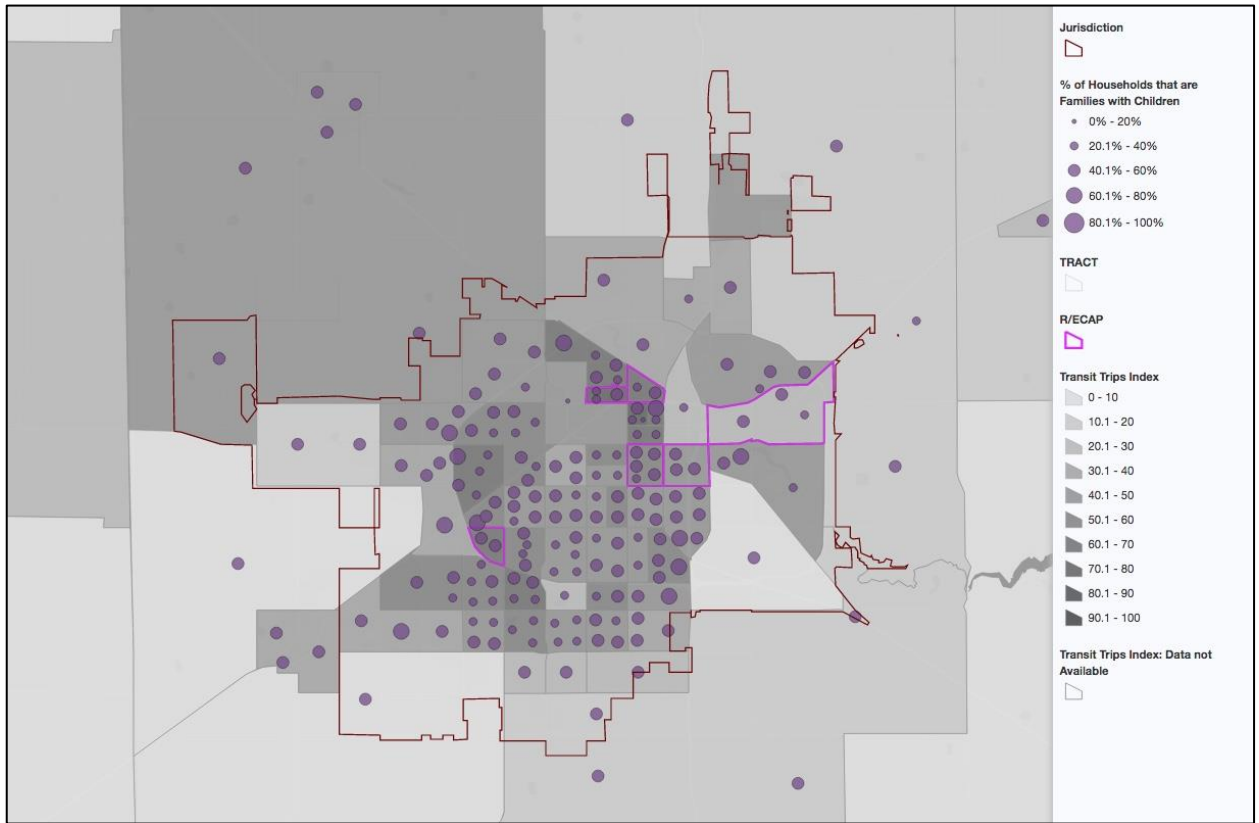
MAP: Transit Index, National Origin



Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

There does not appear to be any disparity in access to transportation opportunity based on family size, residential living patterns, and transit index.

MAP: Transit Index, Family Status

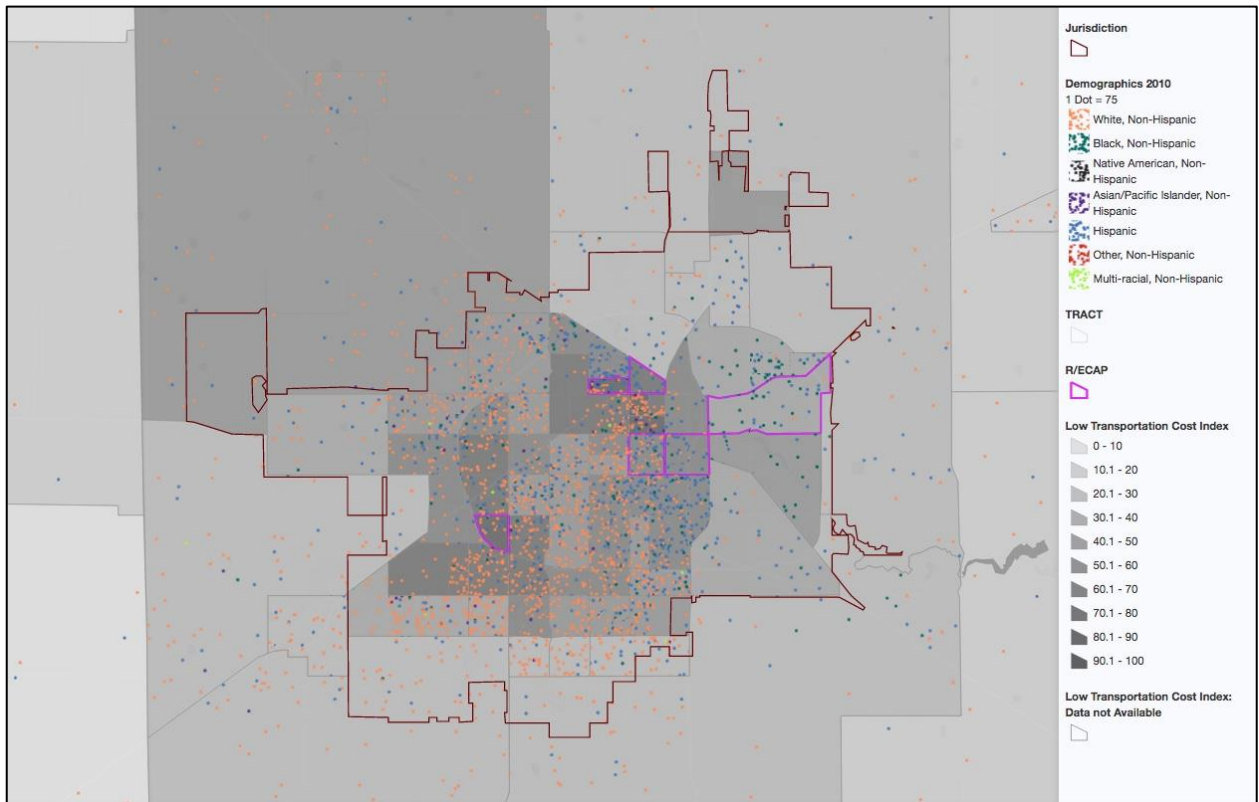


Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

Low Transportation Cost Index

The Low Transportation Cost Index shows a similar pattern to the Transit Index. Residents who live outside the city center have lower scores on this index, while residents closer to the downtown area have higher scores. Census tracts on the eastern part of the city have a relatively large Black, non-Hispanic population and have some of the lowest scores in the City.

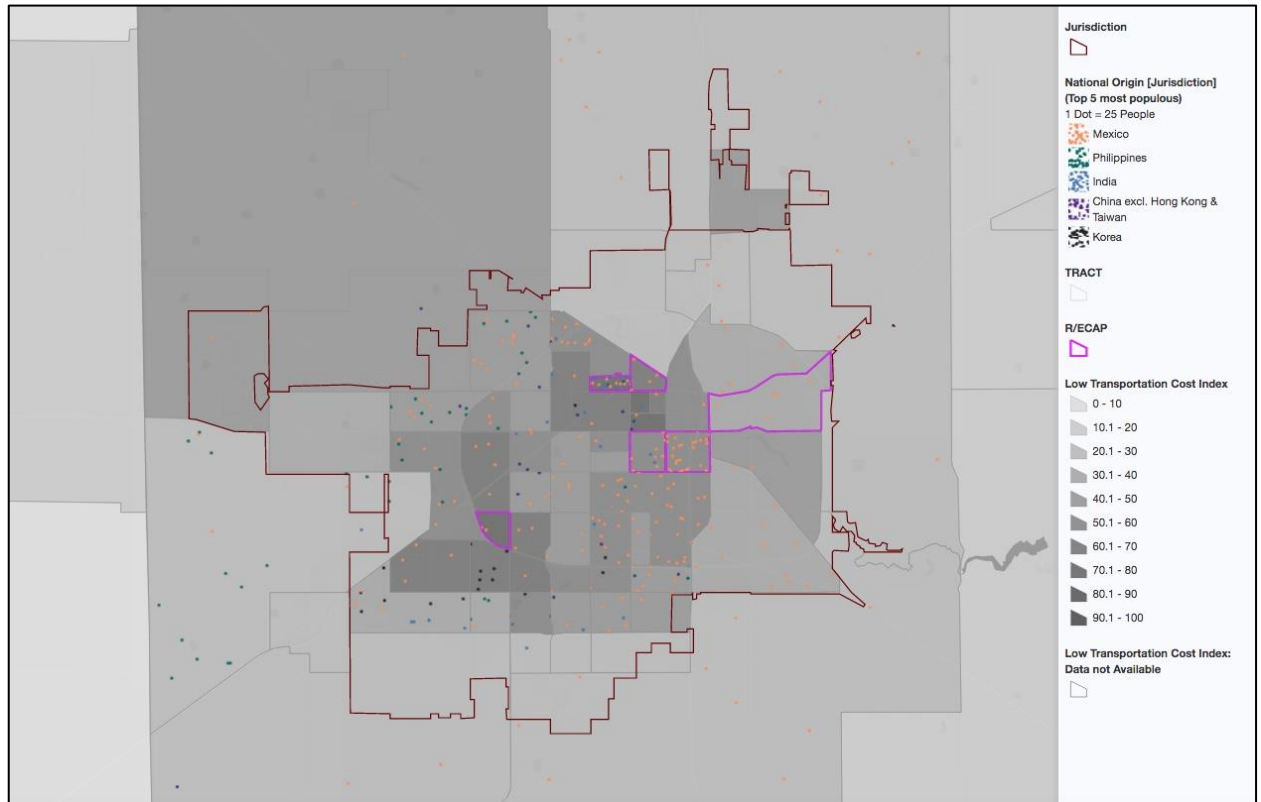
MAP: Low Transportation Cost Index, Race/Ethnicity



Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

There is no disparity in access to transportation based on national origin, the Low Transportation Cost Index, and residential living patterns.

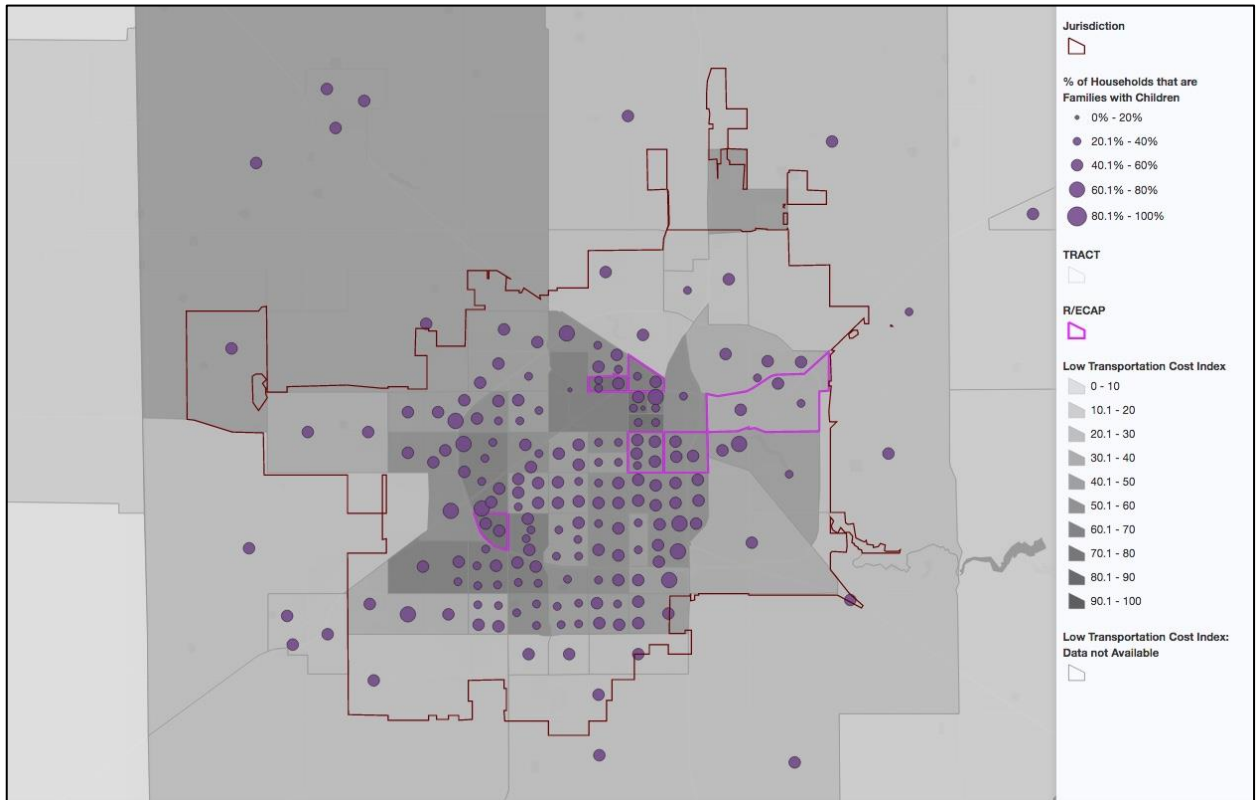
MAP: Low Transportation Cost Index, National Origin



Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

There is no clear relationship between Low Transportation Cost Index, family type, and residential living pattern.

MAP: Low Transportation Cost Index, Family Status

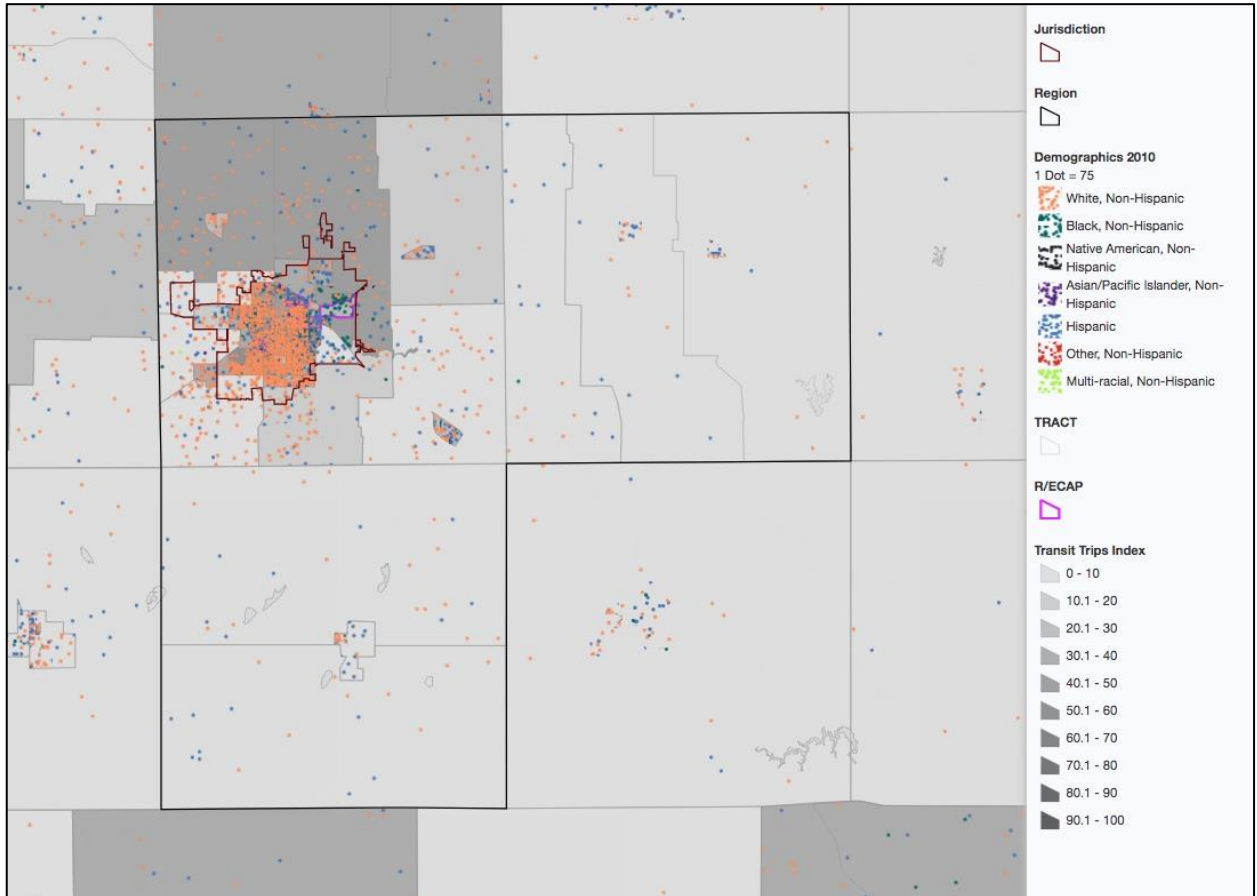


Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

Transit Index (Region)

The Transit Index for the region shows greater access to transportation near the City of Lubbock. The census tracts in the neighboring counties have significantly lower scores on the Transit Index.

MAP: Transit Index, Race/Ethnicity (Region)

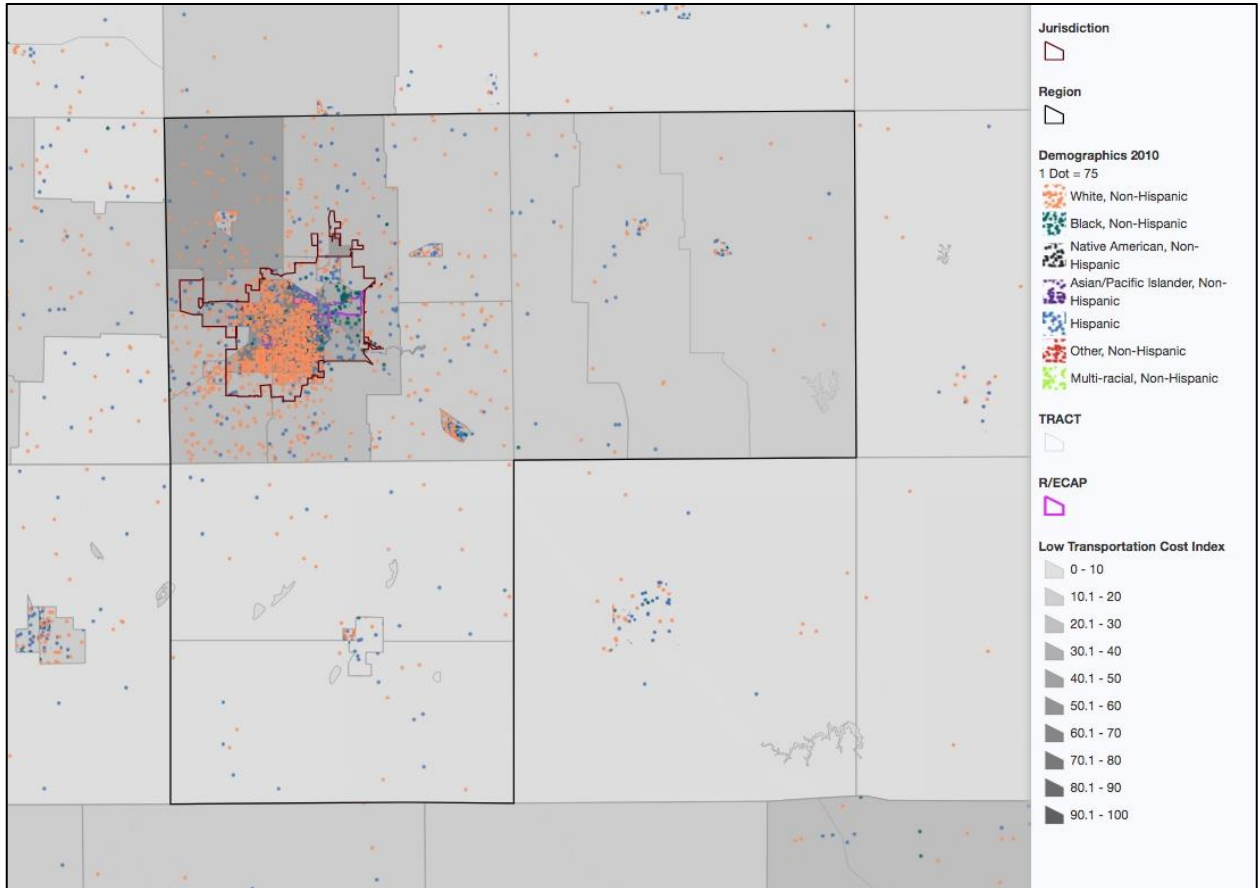


Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

Low Transportation Cost Index (Region)

Living patterns are closely related to Low Transportation Cost in the region. Residents near Lubbock have higher scores on the Low Transportation Index and residents in the rural tracts away from the city have lower scores, particularly to the south.

MAP: Low Transportation Cost Index, Race/Ethnicity (Region)

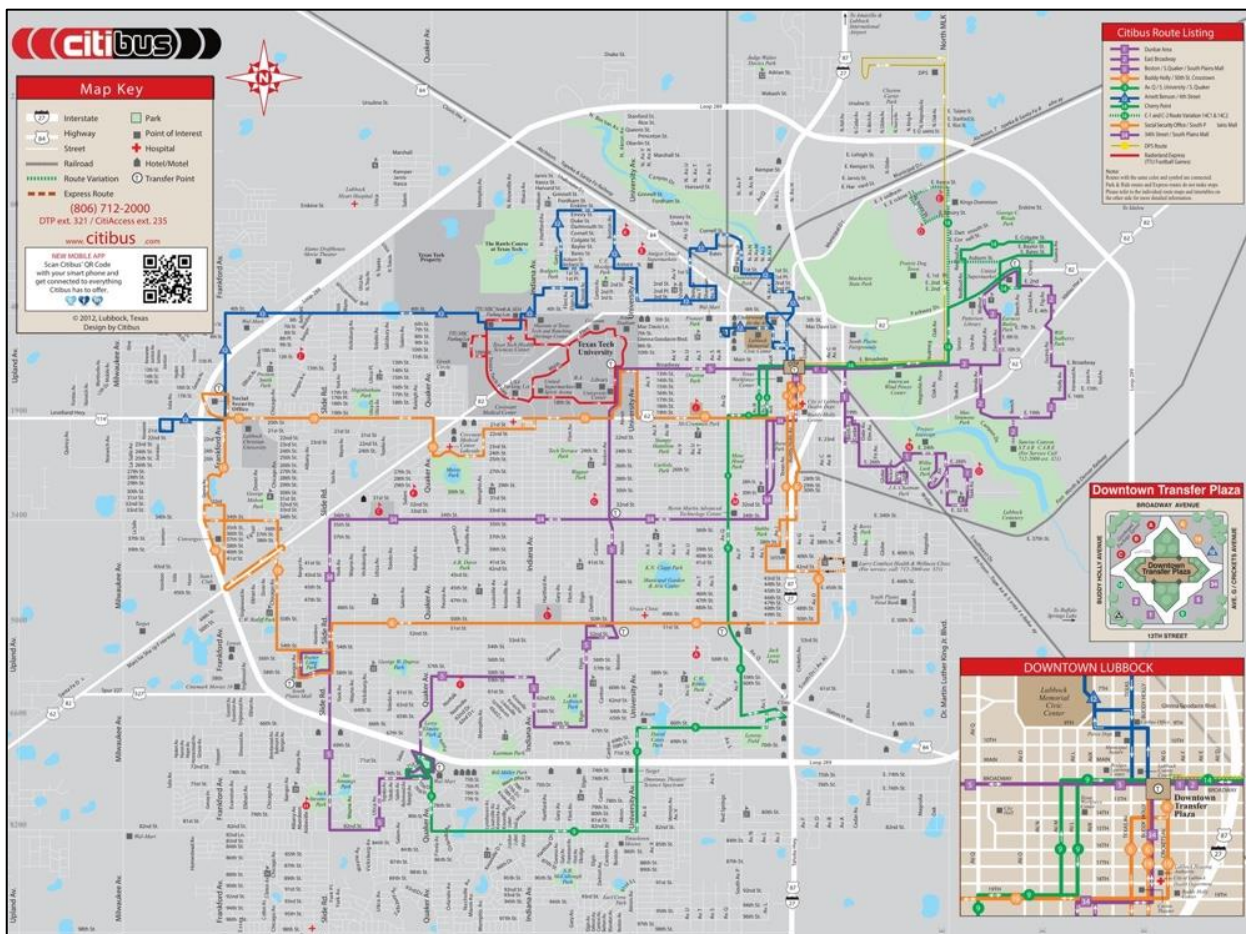


Source: Location Affordability Index (LAI) data, 2008-2012 (HUD AFFHT0004)

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

Citibus operates an extensive system in Lubbock that is fully accessible to persons with disabilities. While the bus system covers a significant geographic region the hours of operation may not be enough to assist residents, particularly low-income residents. Many low-income residents work non-traditional hours and the bus system stops running before 8pm each weeknight. Additionally, it does not run on major holidays or Sundays, which are often workdays for low-income residents. Further, as Lubbock expands, bus routes are not being updated to ensure access to new job centers. This schedule limitation and the lack of a reduced cost low-income bus pass option may affect disparities in access to transportation. One funding limitation is that Citibus is funded by State and Federal funds with just approximately 10 – 15% from the City of Lubbock General Fund. This limits the City’s influence on changes to routes and schedules.

MAP: Citibus Fixed Routes



Source: Citibus, Lubbock System Map, 2017

d. Access to Low Poverty Neighborhoods

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

HUD provides a Low Poverty Index to help measure any disparities in access to low poverty neighborhoods. This index uses rates of family poverty by household to measure exposure to poverty and a higher score indicates less exposure to poverty. In the City of Lubbock two racial or ethnic groups stand out as having a disparity in access to low poverty neighborhoods, Black, non-Hispanic and Hispanic. The Black, non-Hispanic score was very low, over 30 points below the population with the highest score (Asian/Pacific Islander).

The same pattern exists for the population below the poverty line in Lubbock and the Lubbock region. In all cases, the Black, non-Hispanic population and Hispanic population had disproportionately low access to low poverty areas.

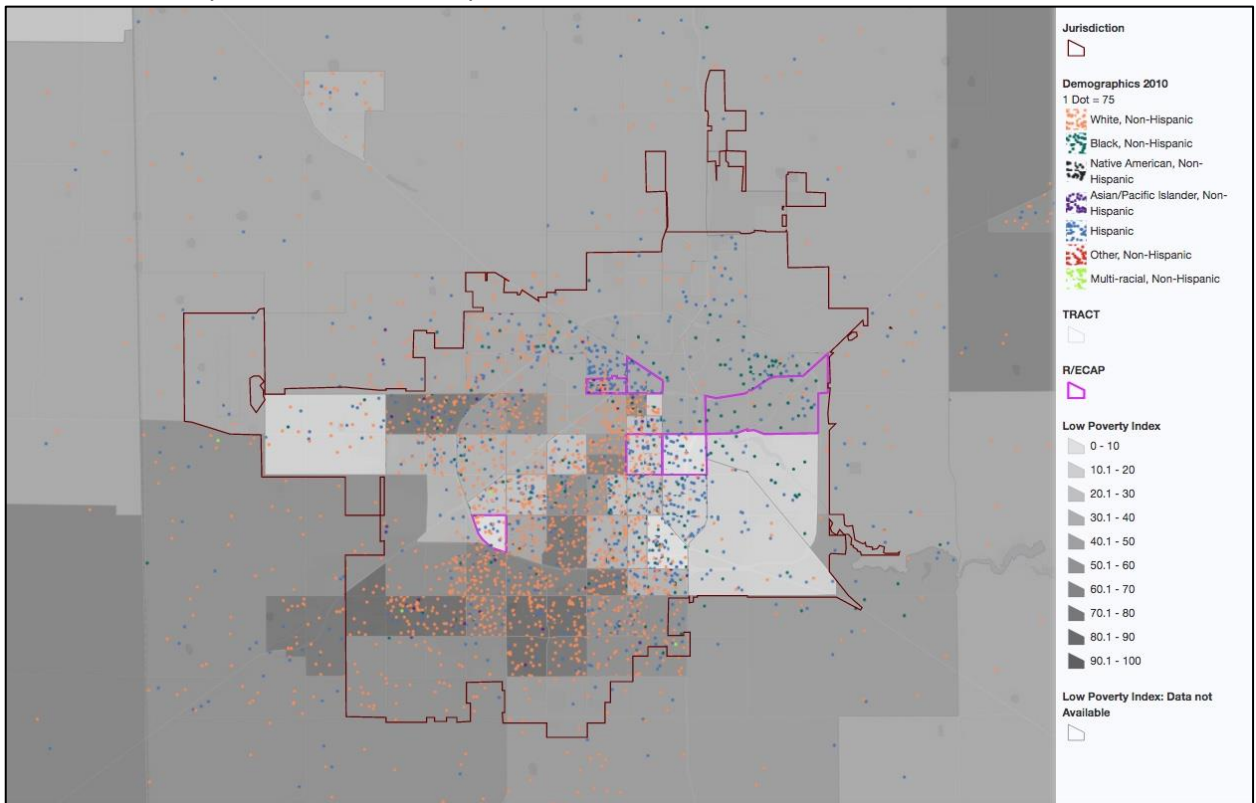
Table: Opportunity Indicators by Race/Ethnicity – Low Poverty Index		
	Lubbock, TX (Jurisdiction)	Lubbock, TX (Region)
Total Population		
White, Non-Hispanic	58.53	56.33
Black, Non-Hispanic	28.93	30.00
Hispanic	37.10	37.82
Asian/Pacific Islander	59.89	59.92
Native American	50.09	49.33
Population Below Federal Poverty Line		
White, Non-Hispanic	48.21	47.11
Black, Non-Hispanic	24.93	25.71
Hispanic	30.28	30.48
Asian/Pacific Islander	51.85	52.20
Native American	46.52	43.15
Low Poverty Index Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)		

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

Low Poverty Index

Access to low poverty neighborhoods is very closely related to residential living patterns. The southeastern part of the city has low Low Poverty Index scores and the southwestern part of the city has high Low Poverty Index scores, one exception being a R/ECAP tract near the southwest area of town. The area with low Low Poverty Index scores have a disproportionately higher number of Hispanic residents and the area with high Low Poverty Index scores have a disproportionately high number of White, non-Hispanic residents.

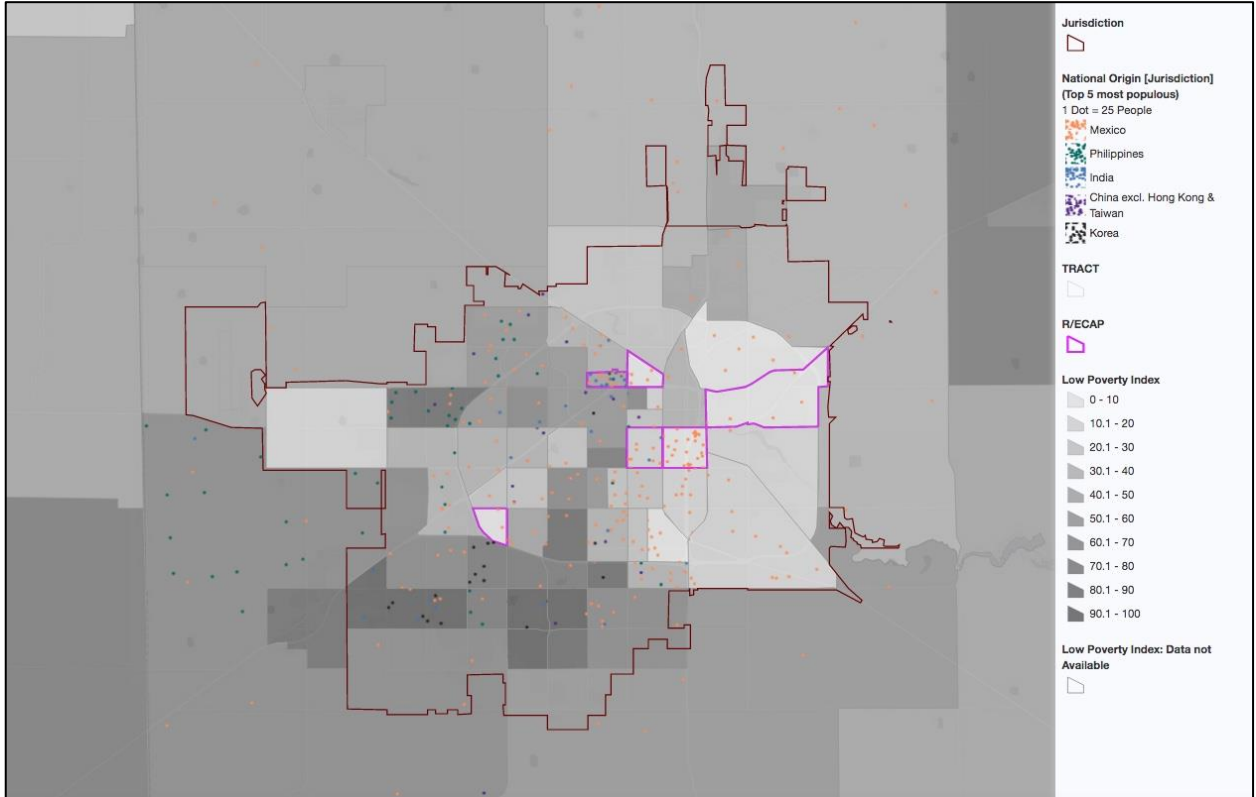
MAP: Low Poverty Index, Race/Ethnicity



Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

There is a weaker correlation between national origin, low poverty index scores, and residential living patterns than race and ethnic groups. However, there does appear to be a disproportionately large population from Mexico that lives in census tracts with lower Low Poverty Index scores.

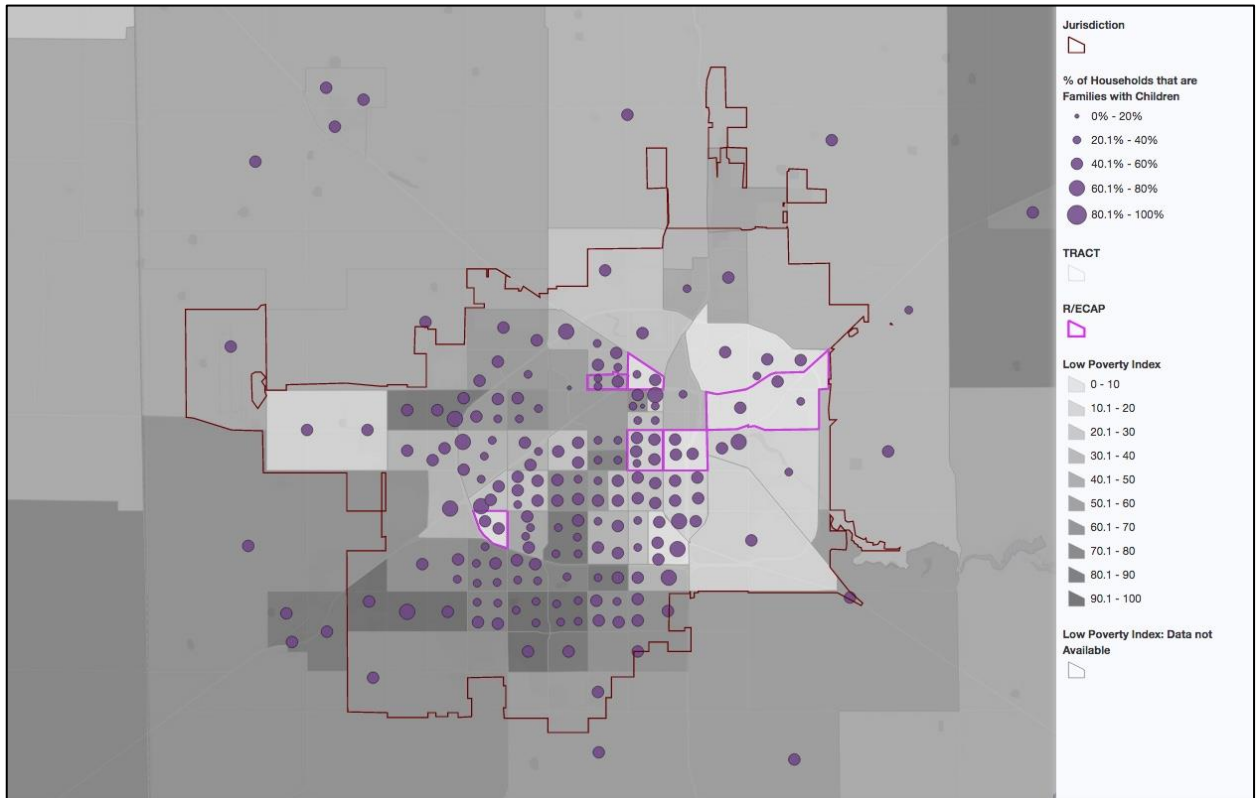
MAP: Low Poverty Index, National Origin



Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

There does not appear to be a disparity in access to low poverty areas based on family type and residential living patterns.

MAP: Low Poverty Index, Family Status

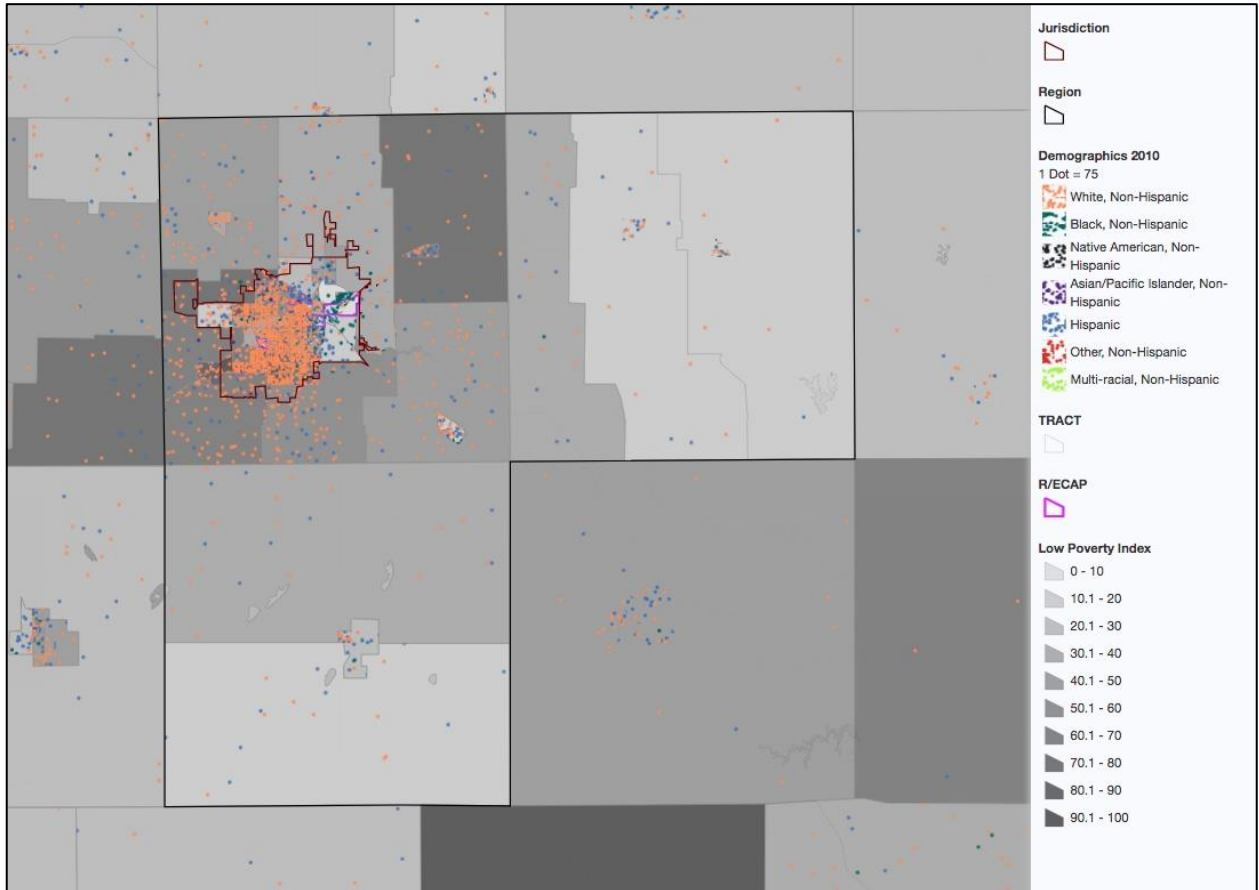


Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

Low Poverty Index (Region)

In general, the region shows lower access to Low Poverty areas in rural census tracts further away from the City of Lubbock.

MAP: Low Poverty Index, Race/Ethnicity (Region)



Source: 2009-2013 American Community Survey 5-Year Estimates (HUD AFFHT0004)

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

As noted in the Community Outreach section, citizens reported that poorly mapped and infrequent public transportation routes and schedules are a major barrier to connecting low income neighborhoods to job centers. Further, there is a lack of financial institutions in lower income communities, which results in lower income individuals relying on predatory products like payday lending.

e. Access to Environmentally Healthy Neighborhoods

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

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins. In Lubbock, there is no disparities in access to environmentally healthy neighborhoods based on race, ethnicity, or poverty status. Similarly, there are no disparities in access to healthy neighborhoods at the regional level. All scores for the jurisdiction and the region are very similar with the lowest score of 77 and highest score of 82.49.

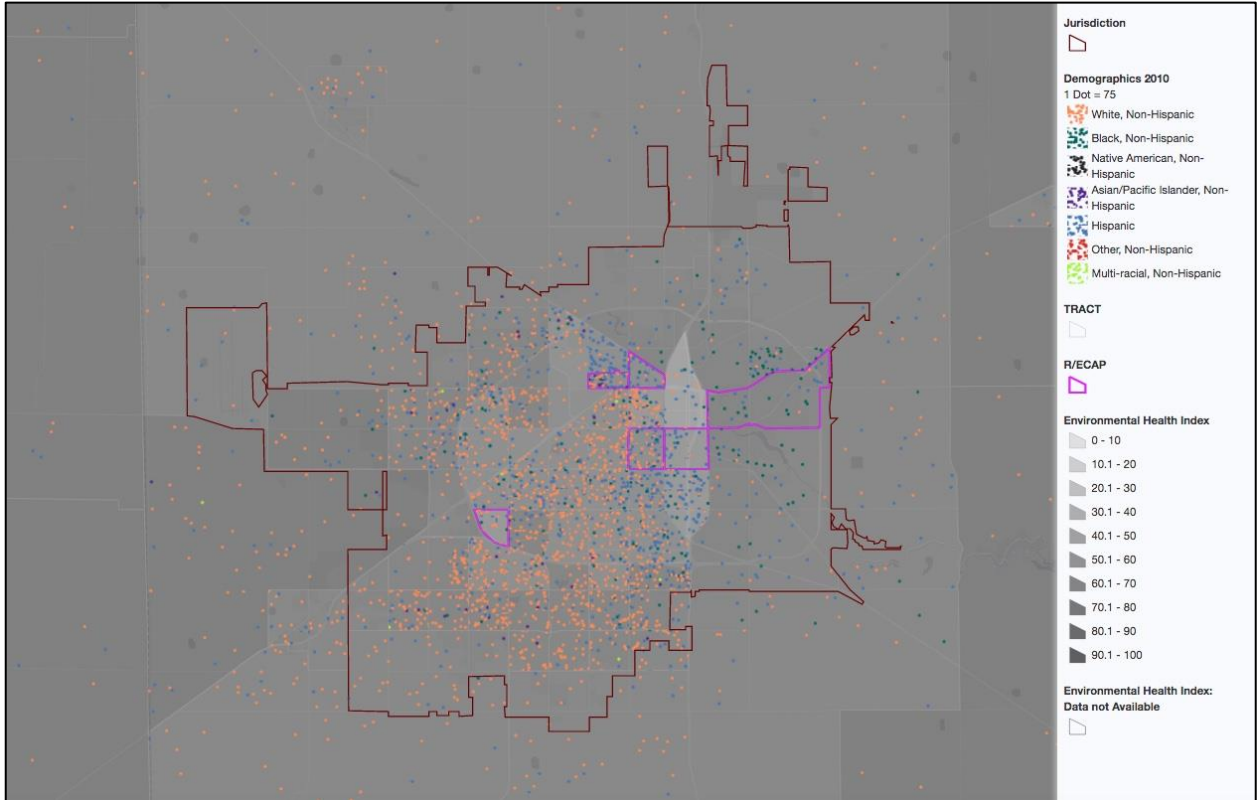
Table: Opportunity Indicators by Race/Ethnicity – Environmental Health Index		
	Lubbock, TX (Jurisdiction)	Lubbock, TX (Region)
Total Population		
White, Non-Hispanic	80.67	82.49
Black, Non-Hispanic	79.31	79.91
Hispanic	77.95	80.03
Asian/Pacific Islander	80.37	80.95
Native American	79.67	81.45
Population Below Federal Poverty Line		
White, Non-Hispanic	78.22	79.50
Black, Non-Hispanic	78.39	78.76
Hispanic	77.00	79.04
Asian/Pacific Islander	79.49	79.93
Native American	76.24	77.48
Environmental Health Index Source: National Air Toxics Assessment (NATA) data, 2011 (HUD AFFHT0004, Table 12 - Opportunity Indicators, by Race/Ethnicity)		

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

Environmental Health Index

The above table does not show any significant disparity in access to environmentally healthy neighborhoods, but residential living patterns show something different. There is a pillar of tracts in eastern Lubbock that have noticeably lower scores in the Environmental Health Index. These tracts run north to south along I-27 and have a relatively high Hispanic population. The downtown area of the city also has lower Environmental Health Index scores than the suburban tracts.

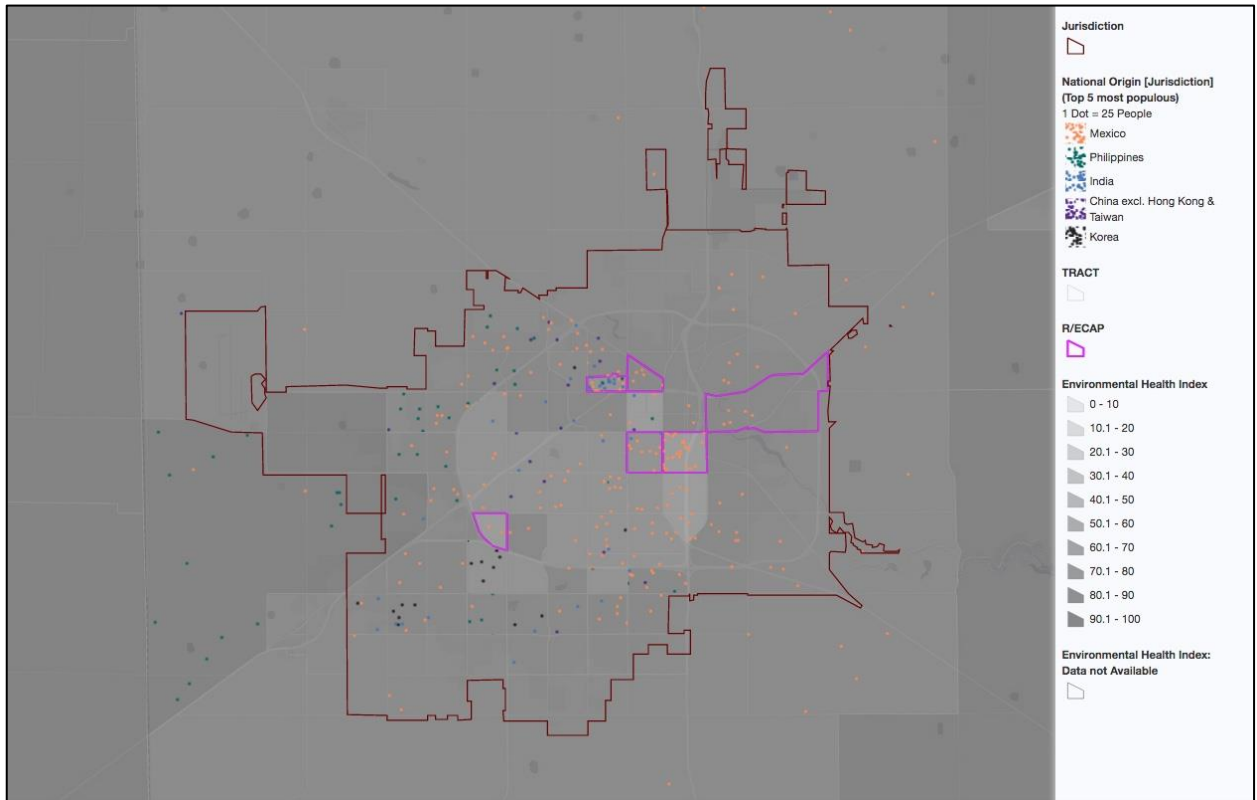
MAP: Environmental Health Index, Race/Ethnicity



Source: National Air Toxics Assessment (NATA) data, 2011 (HUD AFFHT0004)

The census tracts with the lowest Environmental Health Index score also have a relatively high foreign-born population from Mexico.

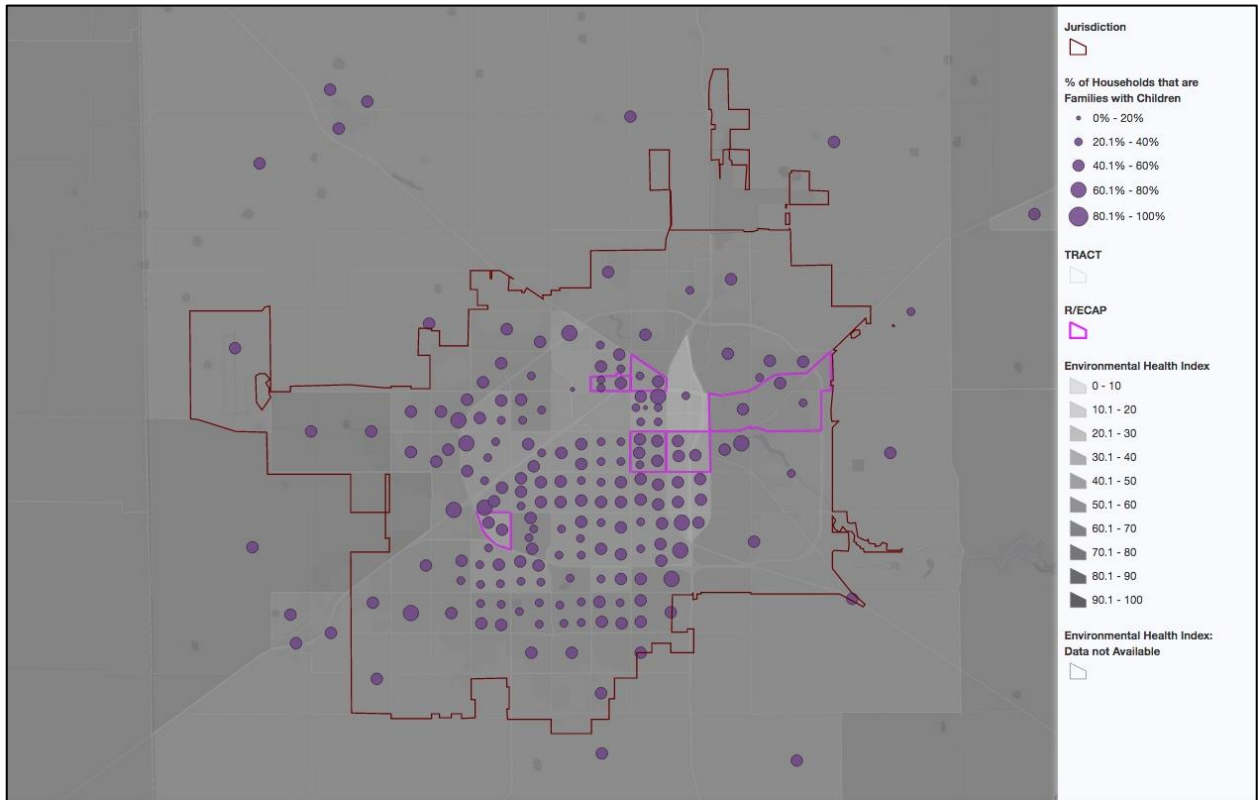
MAP: Environmental Health Index, National Origin



Source: National Air Toxics Assessment (NATA) data, 2011 (HUD AFFHT0004)

There does not appear to be any disparity in access to environmentally healthy neighborhoods based on family size and living patterns.

MAP: Environmental Health Index, Family Status

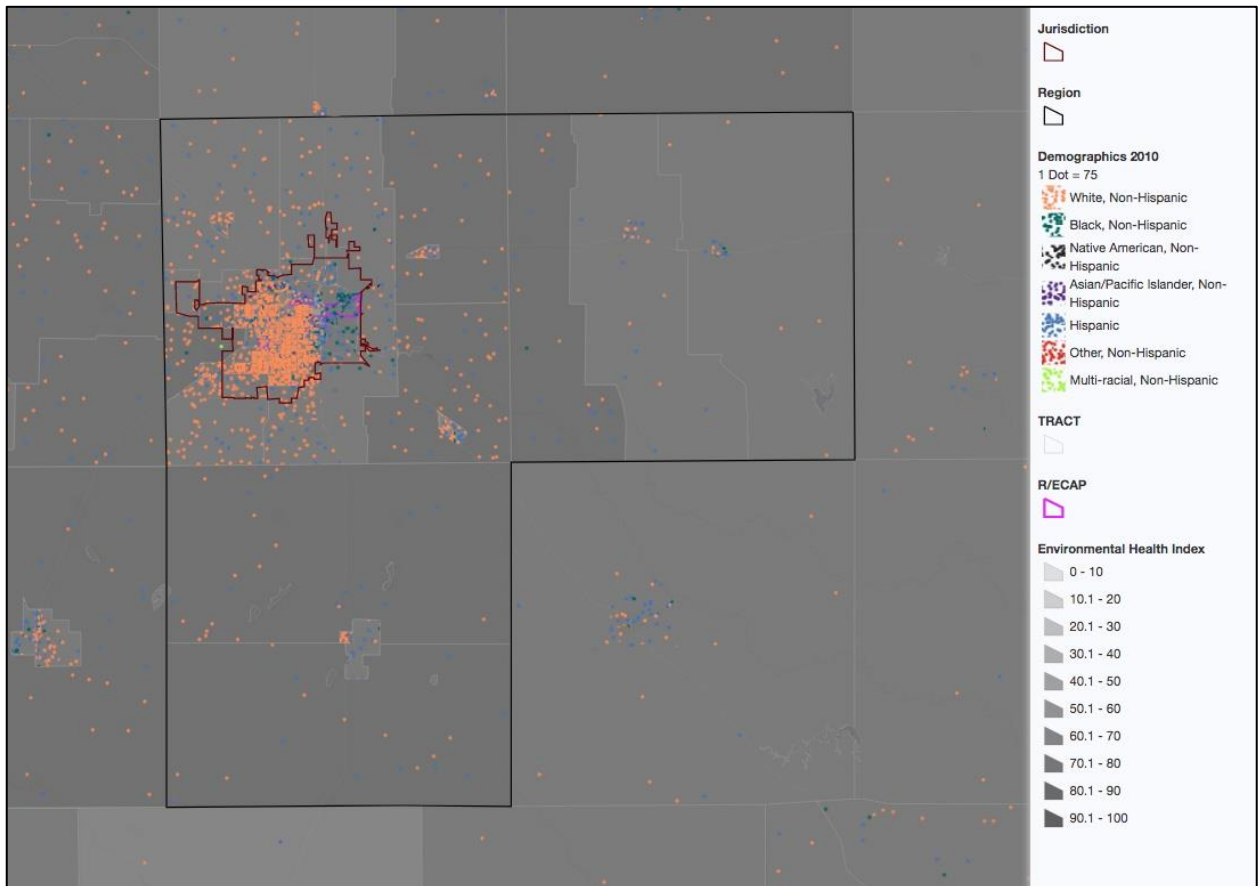


Source: National Air Toxics Assessment (NATA) data, 2011 (HUD AFFHT0004)

Environmental Health Index (Region)

Environmental Health Index scores throughout the region are relatively uniform but there is some variation based on residential living patterns. Rural areas tend to have higher Environmental Index scores than more urban areas. The census tracts on the eastern edge of the region are an exception, the Environmental Health scores in those tracts are like city and suburban tracts.

MAP: Environmental Health Index, Race/Ethnicity (Region)



Source: National Air Toxics Assessment (NATA) data, 2011 (HUD AFFHT0004)

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

f. Patterns in Disparities in Access to Opportunity

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

For the protected class groups HUD has provided data there are two groups that have disproportionately low access to opportunity areas. The Black, non-Hispanic population and the Hispanic population consistently score lower on the indices provided by HUD. These indicators show a pattern of relative segregation throughout the city. The eastern part of the City of Lubbock has the majority of the R/ECAPs and a relatively large Black, non-Hispanic, Hispanic, and Mexico-born populations.

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

The southwestern Census tracts have high access across multiple indicators. These tracts have high access to low poverty neighborhoods, labor markets, and high quality educational opportunities. Census tracts on the southeast side of the city are the opposite. These tracts have low access to low poverty neighborhoods, labor markets, and high quality educational opportunities.

2. Additional Information

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

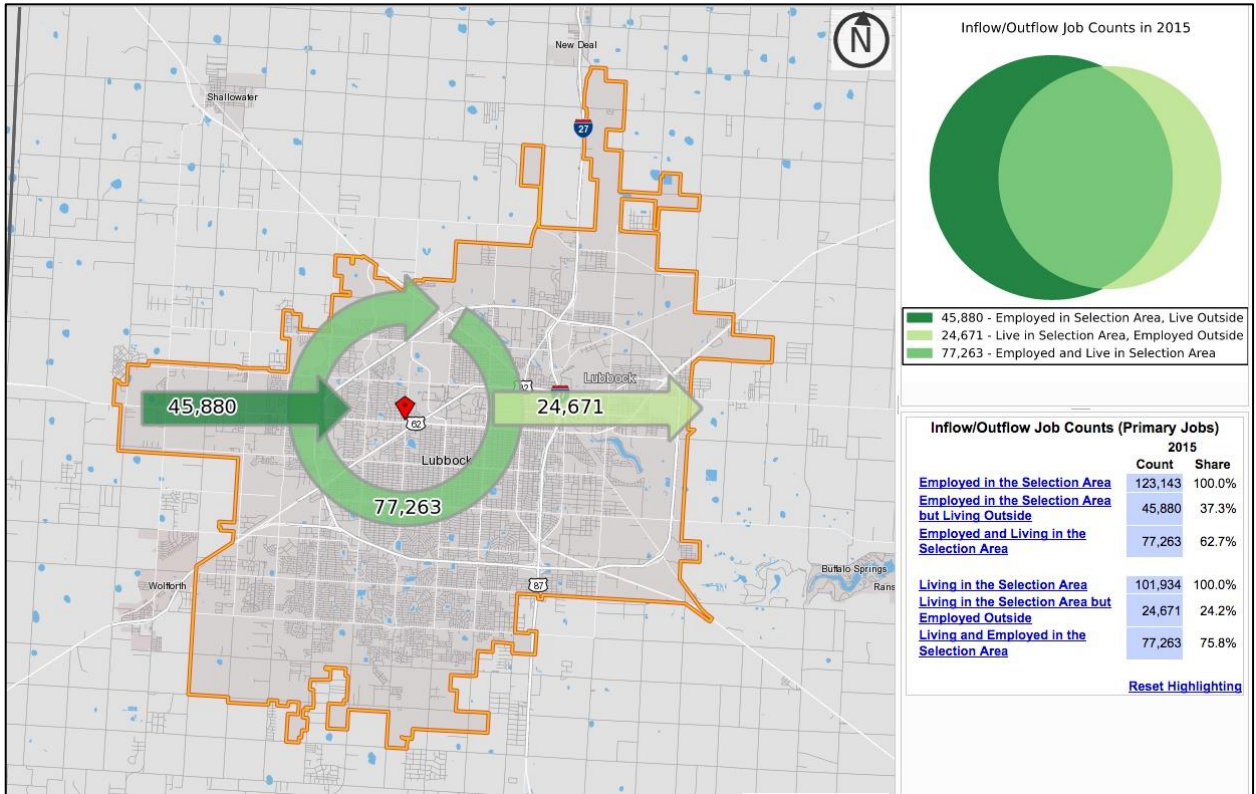
The Texas Fair Housing Act and the United States Fair Housing Act both prohibit housing discrimination based on race, color, religion, sex, national origin, disability, or familial status. Race, color, national origin, disability, and familial status are all discussed throughout this document. There is no additional relevant information that the remaining protected classes (religion and sex) face disparities in access to opportunity in the City or Region.

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

An analysis of commuting patterns within Lubbock shows that providing greater housing and employment activities within the City can help with transportation issues. Individuals who cannot afford housing near their work must commute, which increases traffic, pollution, and strain on public investments. Long commutes have been linked to serious health problems including increased blood sugar, cholesterol, anxiety, and depression. Workers with shorter commutes are happier, have greater productivity and more likely to stay at their jobs. Long distance commuting also reduces opportunities for non-private vehicle commuting such as public transportation, cycling, and walking. In Lubbock, 93 percent of workers commuted by car, truck, or van, and the vast majority of which commuted alone. Less than 4 percent used public transportation, walked, or bicycled.

The following map shows the number of people who commute into Lubbock, out of Lubbock, and those who both work and live in Lubbock. Nearly 40 percent of Lubbock employees live outside the City and nearly 25 percent of residents living in Lubbock commute out of the City for work. In total, over 70,000 people have a work/residence disconnect.

MAP: Inflow/Outflow Job Counts, Lubbock City, 2015



Source: Longitudinal Employer-Household Dynamics (LEHD), 2015

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

The availability, type, frequency, and reliability of public transportation is an area of concern in Lubbock. A significant portion of the population commutes into or out of Lubbock. Reliable transportation that is available when and where workers need it, particularly low-income workers, is essential to the community.

The *location of employers* and *location and type of affordable housing* are interrelated issues that contribute to disparities in opportunity. Areas with economic opportunities lack the housing necessary for the workforce, which increases commute times and limits opportunities for low-income individuals.

The *location of proficient schools* contributes to disparities in access to opportunities. High quality schools are necessary for residents to build the skills necessary for economic stability. In Lubbock, there is a disparity in access to educational opportunities for Black, non-Hispanic and Hispanic residents.

Disproportionate Housing Needs

1. Analysis

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

As defined by HUD, there are four housing problems and a household is said to have a housing problem if they have 1 or more of the following problems:

1. Housing unit lacks complete kitchen facilities
2. Housing unit lacks complete plumbing facilities
3. Household is overcrowded, meaning there is more than 1 person per room
4. Household is cost burdened which is defined as spending more than 30 percent of monthly income on housing costs

HUD also identifies four severe housing problems:

1. Housing unit lacks complete kitchen facilities
2. Housing unit lacks complete plumbing facilities
3. Household is severely overcrowded, meaning there are more than 1.5 people per room
4. Household is severely cost burdened, spending more than 50 percent of monthly income on housing costs

Within the City of Lubbock, three groups experience disproportionate housing problems by race/ethnicity. Black, non-Hispanic, Hispanic, and residents who identify as “Other, non-Hispanic” all have higher rates of housing problems than the overall city population. These same populations experience greater housing problems at the regional level. Additionally, Family households with five or more people and non-family households also experience housing problems at a higher rate in the City and Region.

For households experiencing severe housing problems there is again a disproportionately high rate of problems for the same three racial/ethnic groups. Black, non-Hispanic, Hispanic, and “Other, non-Hispanic” households all experience severe housing problems at a rate higher than other groups in the City of Lubbock.

Table: Disproportionate Housing Needs						
	(Lubbock, TX) Jurisdiction			(Lubbock, TX) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	17,700	55,590	31.84%	20,479	70,269	29.14%
Black, Non-Hispanic	3,075	6,365	48.31%	3,266	6,854	47.65%
Hispanic	9,775	23,290	41.97%	11,888	29,080	40.88%
Asian or Pacific Islander	592	1,885	31.41%	617	1,950	31.64%
Native American, Non-Hispanic	75	253	29.64%	93	298	31.21%
Other, Non-Hispanic	494	968	51.03%	598	1,164	51.37%
Total	31,725	88,345	35.91%	36,955	109,620	33.71%
Household Type and Size						
Family households, <5 people	11,270	45,325	24.86%	13,799	58,641	23.53%

Family households, 5+ people	3,645	7,450	48.93%	4,868	10,458	46.55%
Non-family households	16,810	35,580	47.25%	18,290	40,527	45.13%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	9,925	55,590	17.85%	11,225	70,269	15.97%
Black, Non-Hispanic	1,660	6,365	26.08%	1,753	6,854	25.58%
Hispanic	5,995	23,290	25.74%	7,281	29,080	25.04%
Asian or Pacific Islander	360	1,885	19.10%	370	1,950	18.97%
Native American, Non-Hispanic	44	253	17.39%	62	298	20.81%
Other, Non-Hispanic	265	968	27.38%	370	1,164	31.79%
Total	18,255	88,345	20.66%	21,035	109,620	19.19%

Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS)

(HUD AFFHT0004, Table 9 - Demographics of Households with Disproportionate Housing Needs)

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

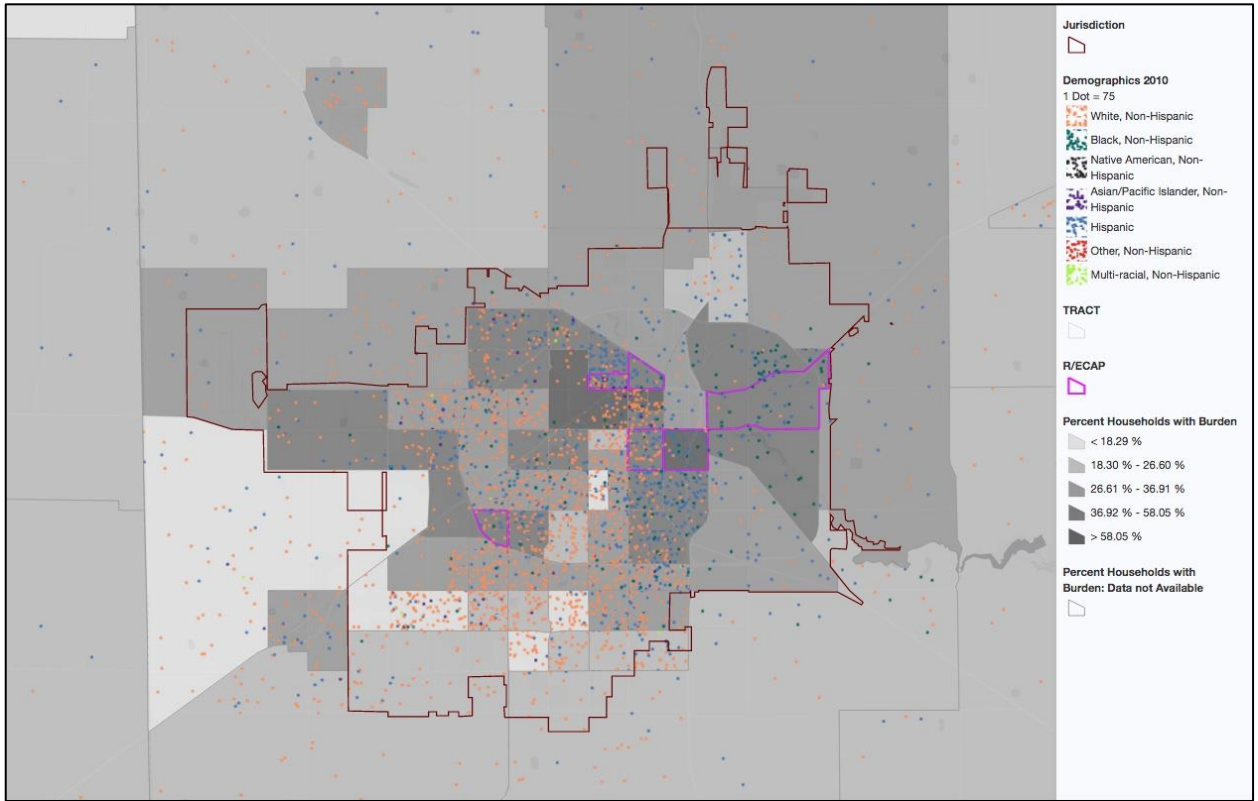
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

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

Housing Problems by Race/Ethnicity

Households with housing problems are distributed across the city throughout many census tracts. Looking at the HUD-provided map with percentage of households with housing problems by race or ethnicity it is difficult to notice any particular patterns. For that reason, it is necessary to look at each race or ethnicity in isolation.

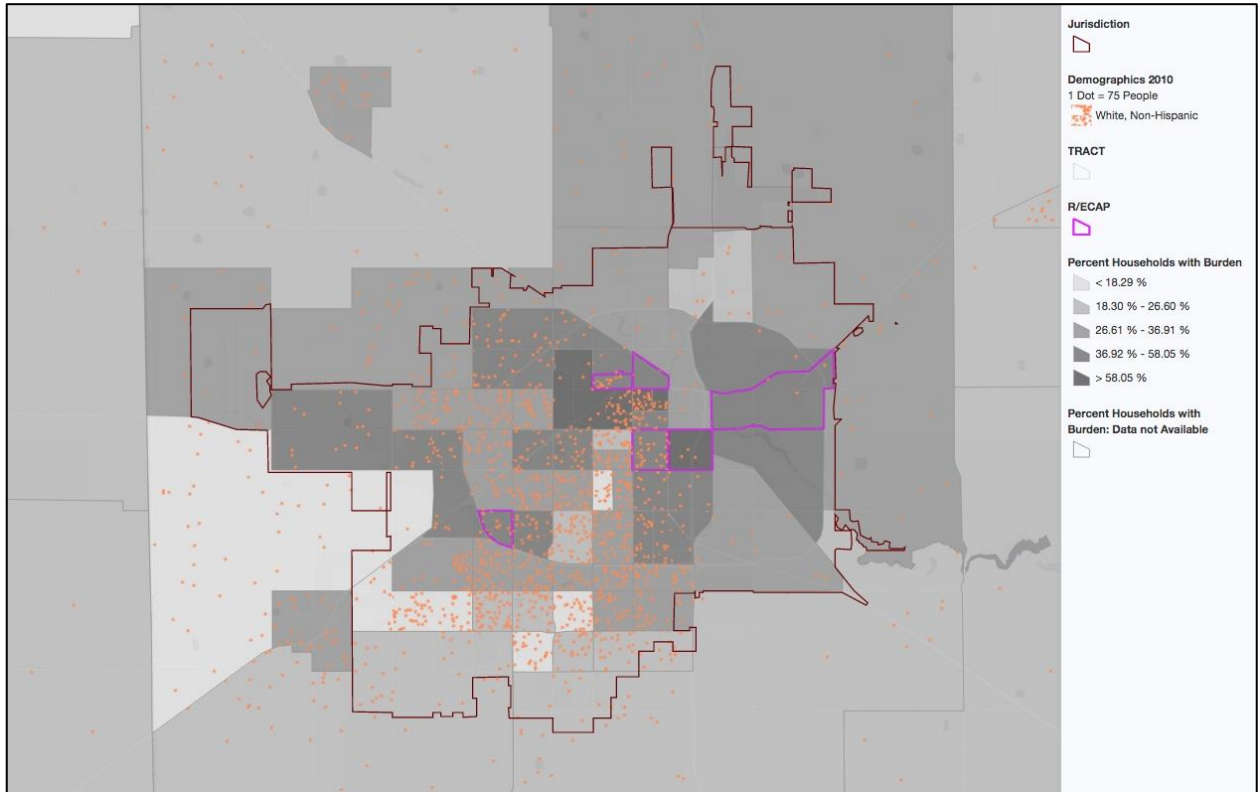
MAP: Housing Problems, Race/Ethnicity



Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), (HUD AFFHT0004)

The White, non-Hispanic population is most heavily concentrated in the central and southern parts of the City of Lubbock. The census tracts with large groups of White, non-Hispanic households include both tracts with a high and low percentage of households with housing problems.

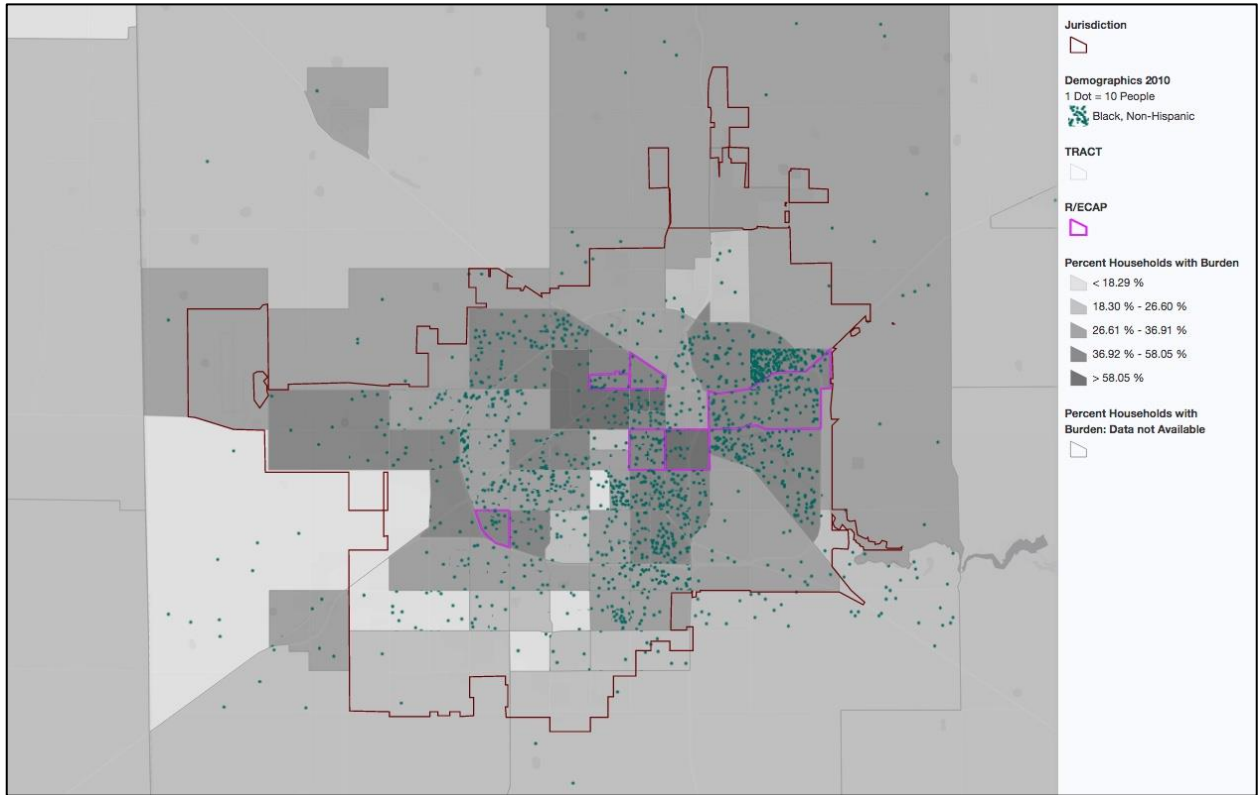
MAP: Housing Problems, White Population



Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), (HUD AFFHT0004)

The Black, non-Hispanic population lives throughout the city but has some areas of concentration in census tracts in the eastern part of the city. Generally, there are fewer Black, non-Hispanic households in tracts with lower levels of housing problems.

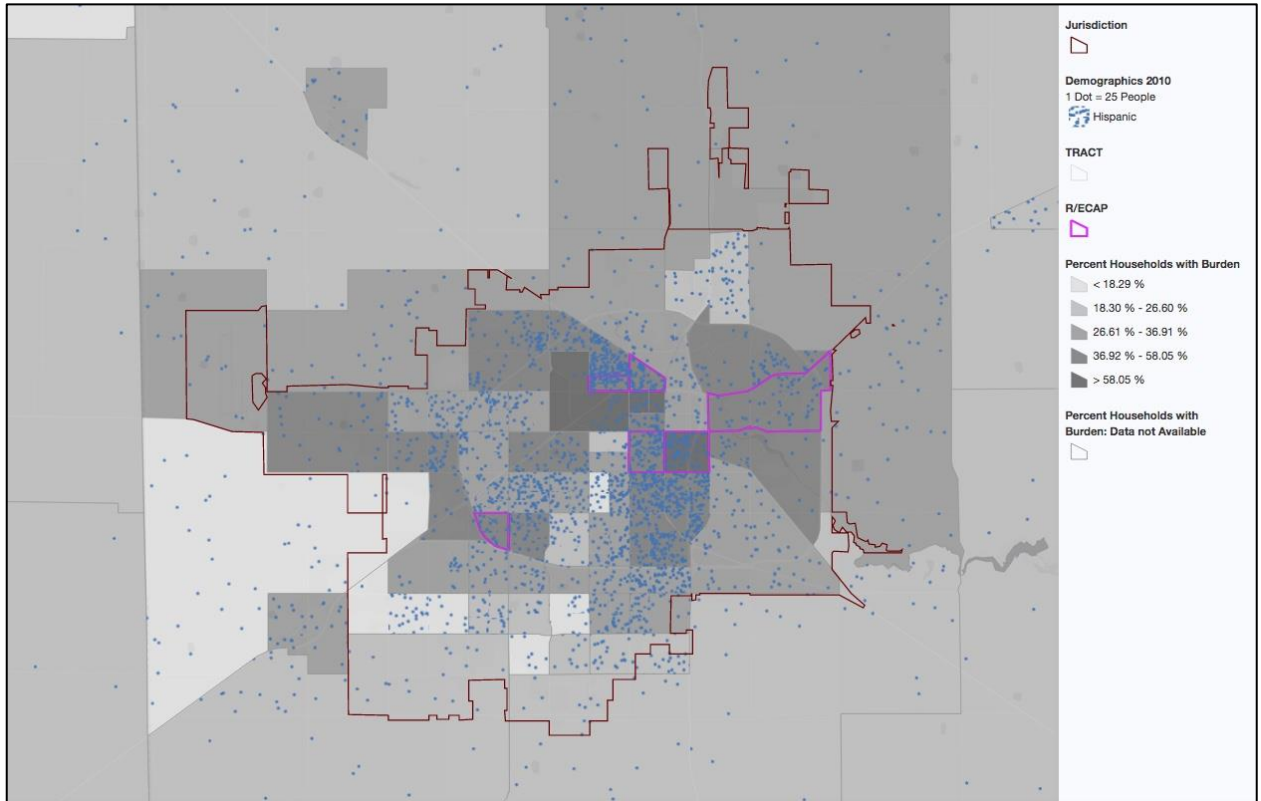
MAP: Housing Problems, Black Population



Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), (HUD AFFHT0004)

The Hispanic population in Lubbock is spread throughout the city, but there are some concentrations in census tracts with a high rate of housing problems. This is particularly true for those living in R/ECAP tracts.

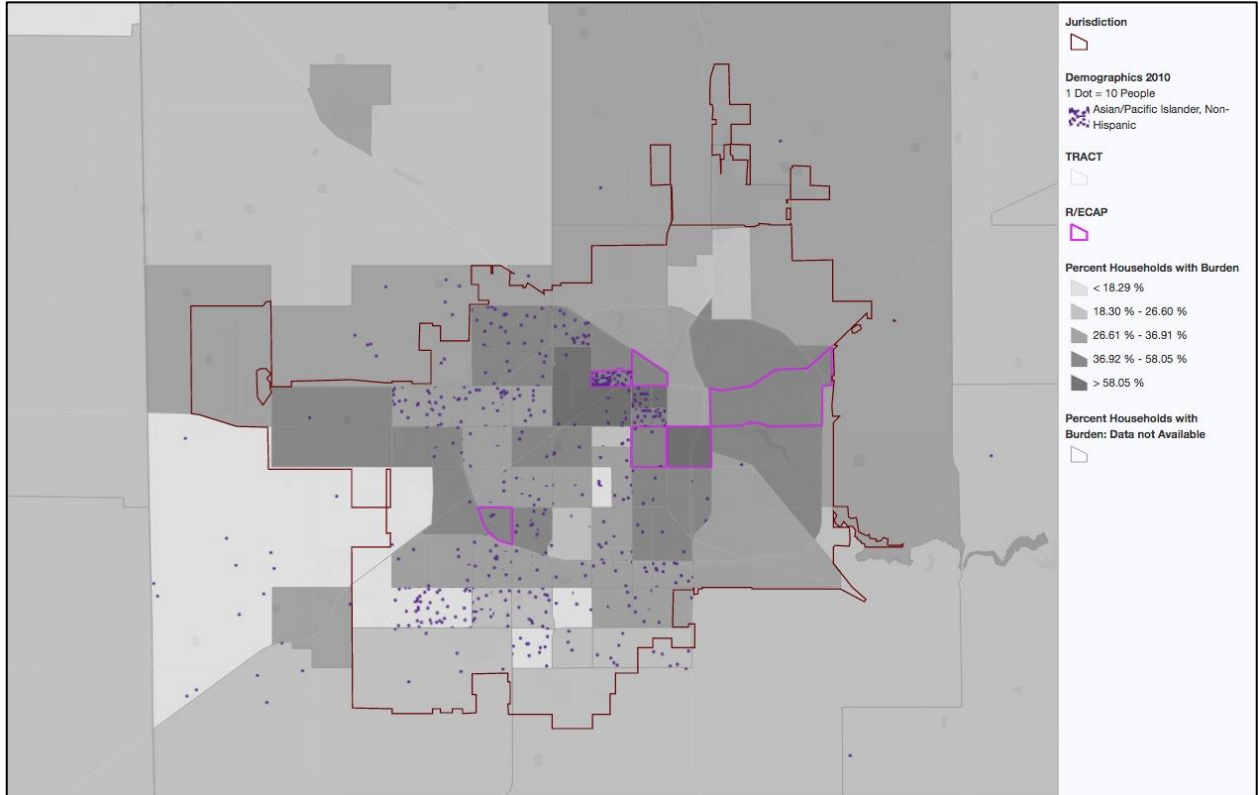
MAP: Housing Problems, Hispanic Population



Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), (HUD AFFHT0004)

The Asian population in Lubbock lives primarily in the central and western parts of the city. There is not a large population of Asian households in areas with significantly high rates of housing problems. An exception being those that live in the downtown area near R/ECAP tracts.

MAP: Housing Problems, Asian Population

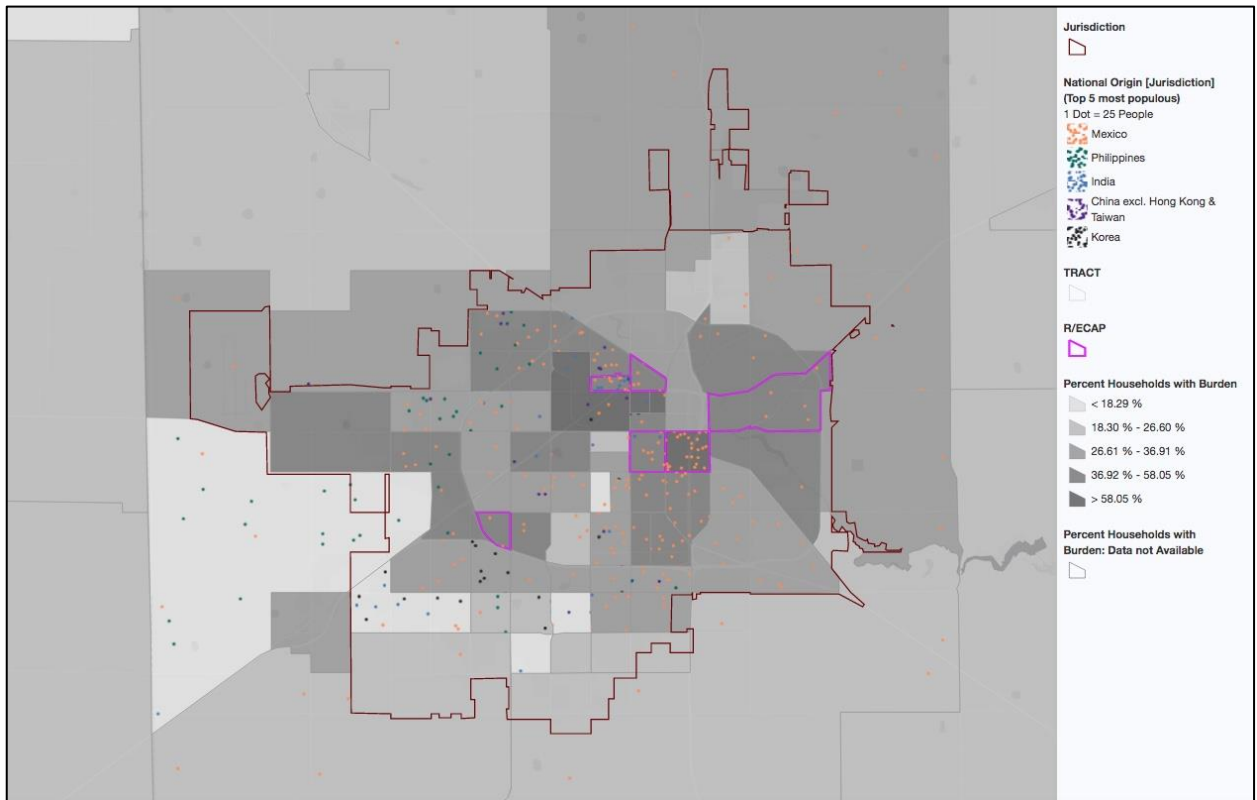


Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), (HUD AFFHT0004)

Housing Problems by National Origin

Foreign-born residents are often at greater risk to live in homes with housing problems. According to the HUD-provided map there is only one area of concern in this area. One R/ECAP tract in the eastern part of the city has a relatively large Mexico-born population and has a high percentage of homes with housing problems.

MAP: Housing Problems, National Origin

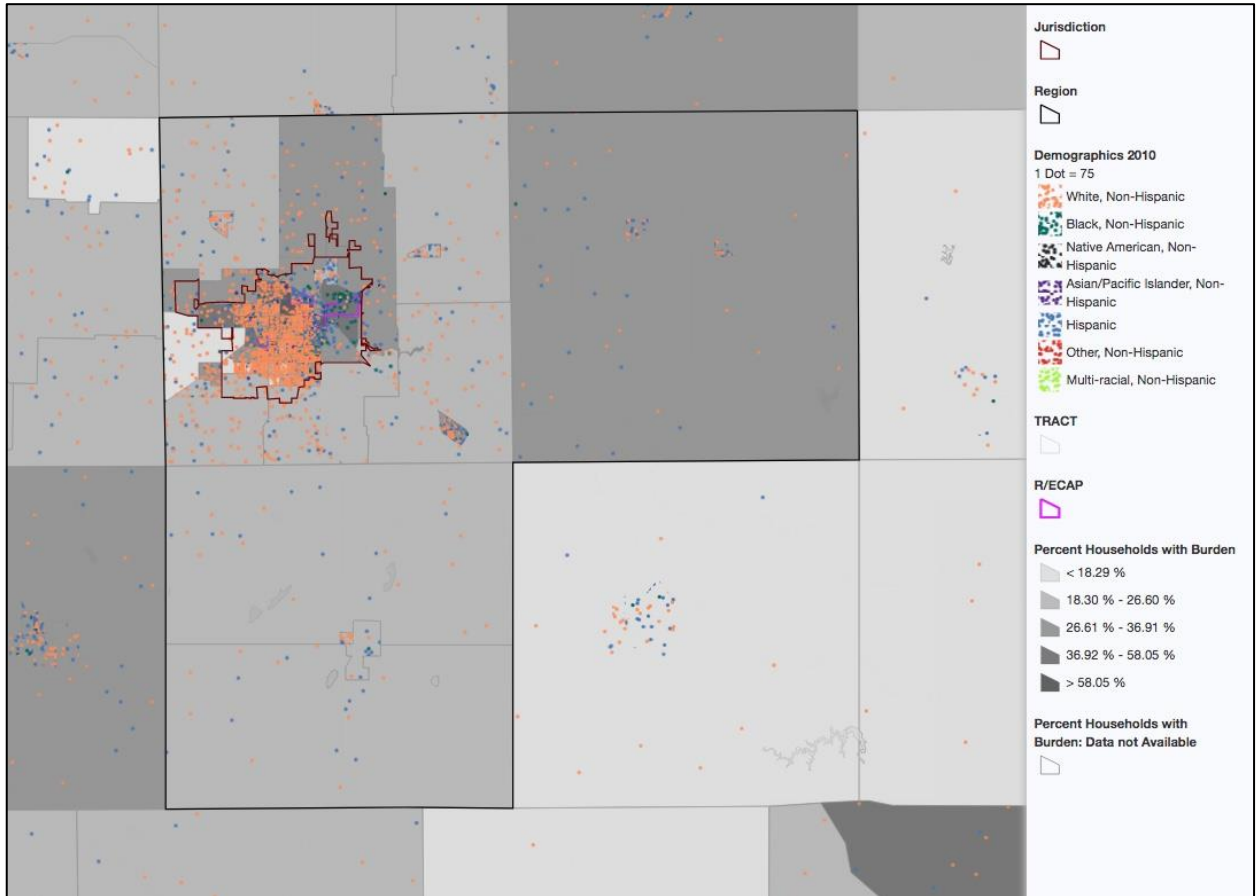


Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), (HUD AFFHT0004)

Housing Problems by Race/Ethnicity (Region)

Regionwide there is not a strong relationship between housing problems and race or ethnicity.

MAP: Housing Problems, Race/Ethnicity (Region)



Source: 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), (HUD AFFHT0004)

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

In the City of Lubbock families with five or more people have a higher rate of living in a home with housing problems than smaller families. Approximately 3,645 large households (or 48.93 percent) face housing problems. To address this problem, it is important that publicly supported housing provide quality housing options that are large enough for families.

In Lubbock, 34.3 percent of all publicly supported housing units have 2 bedrooms and 31.4 percent of have 3+ bedrooms. In total, that is 1,357 multi-bedroom units provided for only 1,081 households with children. Larger units can still assist with larger families but there appears to be adequate housing.

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	68	19.65%	154	44.51%	119	34.39%	223	64.45%
Project-Based Section 8	261	35.41%	289	39.21%	179	24.29%	395	53.60%
Other Multifamily	65	100.00%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	313	32.30%	265	27.35%	351	36.22%	463	47.78%

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014 (HUD AFFHT0004, Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children)

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

Within Lubbock, there is a noticeable difference in the rate of renter- and owner-occupied housing by race and ethnicity. Only the White, non-Hispanic population is more likely to live in an owner-occupied household than the rest of the City as a whole. Black, non-Hispanic households are the least likely to live in an owner-occupied home in Lubbock.

	Owner-Occupied Housing	Renter Occupied Housing
White, Non-Hispanic	54.7%	45.3%
Black	38.0%	62.0%
Asian	39.3%	60.7%
Hispanic	44.1%	55.9%
Lubbock, TX	52.2%	47.8%

Source: 2012-2016 American Community Survey (B25003)

2. Additional Information

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

Lending Practices

Citywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan

applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation, but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for the City of Lubbock, Texas summarizing 2016 HMDA data (the most recent year for which data are available), and data between 2007 and 2016 where applicable. Due to HMDA data’s geographic constraints at the municipal jurisdiction level, the geography utilized includes all Census tracts that fall within the boundaries of the City of Lubbock. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2016 City Overview

In 2016, there were approximately 9,300 applications within the City of Lubbock for home loans to purchase, refinance or make home improvements for a single family home - not including manufactured homes. Of those applications, over 4,900 or 53 percent were approved and originated, an increase of over 340 originations from 2015 and a percentage increase of approximately 7 percent. Of the remaining 4,400 applications, approximately 1,000 or 11 percent of all applications were denied. The top two application denial reasons within the City of Lubbock were credit history (35 percent) and debt-to-income ratio (24 percent), representing nearly 60 percent of the City’s total denials. Incomplete applications and lack of collateral represented 13 and 10 percent of denials respectively. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the approximately 3,400 applications, that were not originated or denied, were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or

inactivity by the borrower or c) in many instances the application may have been withdrawn by the applicant.

Disposition of Application by Loan Type and Purpose, 2016

Single Family Homes (excluding manufactured homes)

	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	3,362	2,281	372
	FHA	2,153	518	7
	VA	400	208	1
	FSA/RHS	0	0	0
Loans Originated				
	Conventional	2,246	1,056	202
	FHA	937	162	1
	VA	212	92	0
	FSA/RHS	0	0	0
Loans Approved but Not Accepted				
	Conventional	117	75	6
	FHA	63	33	1
	VA	10	7	0
	FSA/RHS	0	0	0
Applications Denied				
	Conventional	75	546	125
	FHA	79	134	3
	VA	16	38	1
	FSA/RHS	0	0	0
Applications Withdrawn				

Conventional	210	273	27
FHA	123	76	2
VA	38	29	0
FSA/RHS	0	0	0

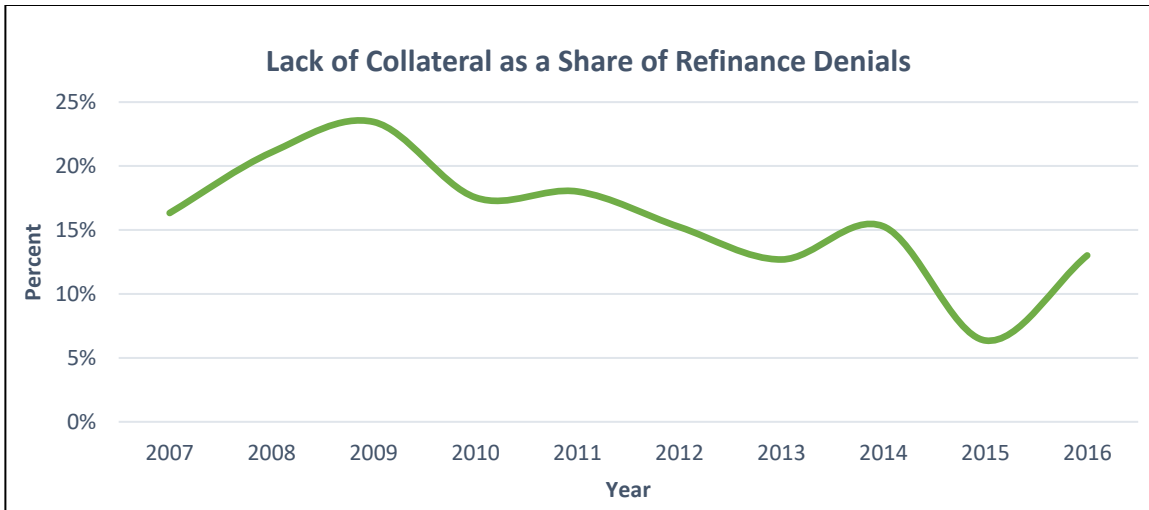
Files Closed for Incompleteness

Conventional	9	69	8
FHA	10	46	0
VA	4	19	0
FSA/RHS	0	0	0

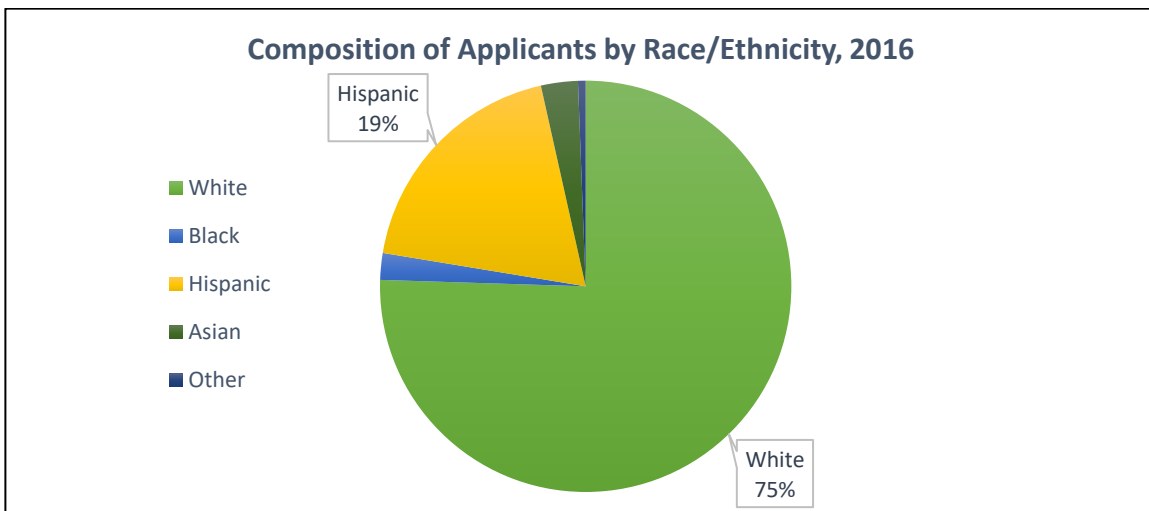
Source: 2015 HMDA

Of the home purchase loans for single family homes that were originated in 2016, (3,395 loans originated) approximately two-thirds of these originations were provided by conventional lenders, slightly higher than the national conventional home purchase share of 61 percent. The remaining 33 percent of home purchase loans in Lubbock were provided by federally-backed sources including the Federal Housing Administration and the Department of Veterans Affairs. The FHA and VA lenders had application/approval ratios of 41 percent and 50 percent respectively. Conventional lenders, by contrast, originated home purchase loans at a higher 58 percent of all applications.

A further examination of the 1,017 denials within Lubbock during 2016 indicates that approximately 71 percent were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications was credit history (25 percent of refi. denials), followed by debt-to-income ratio (22 percent of refi. denials). Lack of collateral was the denial reason for 13 percent of refinance applications in 2016, higher than 2015 but lower than the highs of the housing crisis. Typically, homeowners, seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage. Shown below, the percentage of refinance denials given for the reason of lack of collateral has generally declined since the peak of the housing crisis, suggesting that the number of “under-water” homes in Lubbock has declined since 2009 but has recently increased.

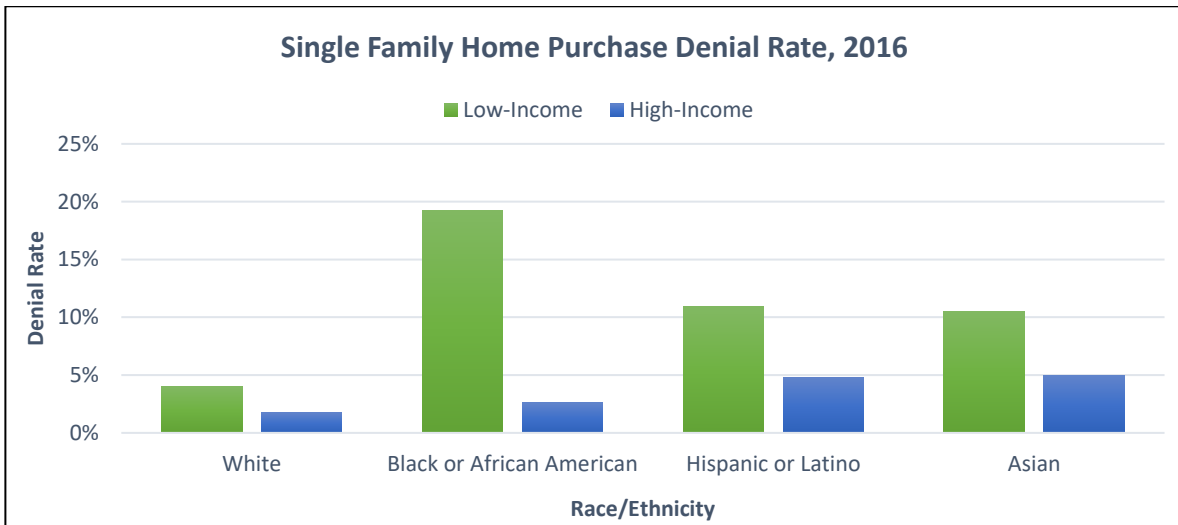


The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in Lubbock varies by race/ethnic groups. It should be noted that the majority of applicants in 2016 were non-Hispanic Whites (over 75 percent), followed by Hispanic applicants at 19 percent. Asian (2.9 percent) and Black (2.1 percent) applicants were represented by much smaller sample sizes, and are excluded from following the analysis where there is insufficient data. In 2016, Whites were least likely to be denied for conventional single family home purchases, being denied at a rate of 2.3 percent. Hispanics were denied at a rate of 5 percent, while Asian and Black applicants faced higher home purchase denial rates at 6 and 7 percent, respectively.



Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within

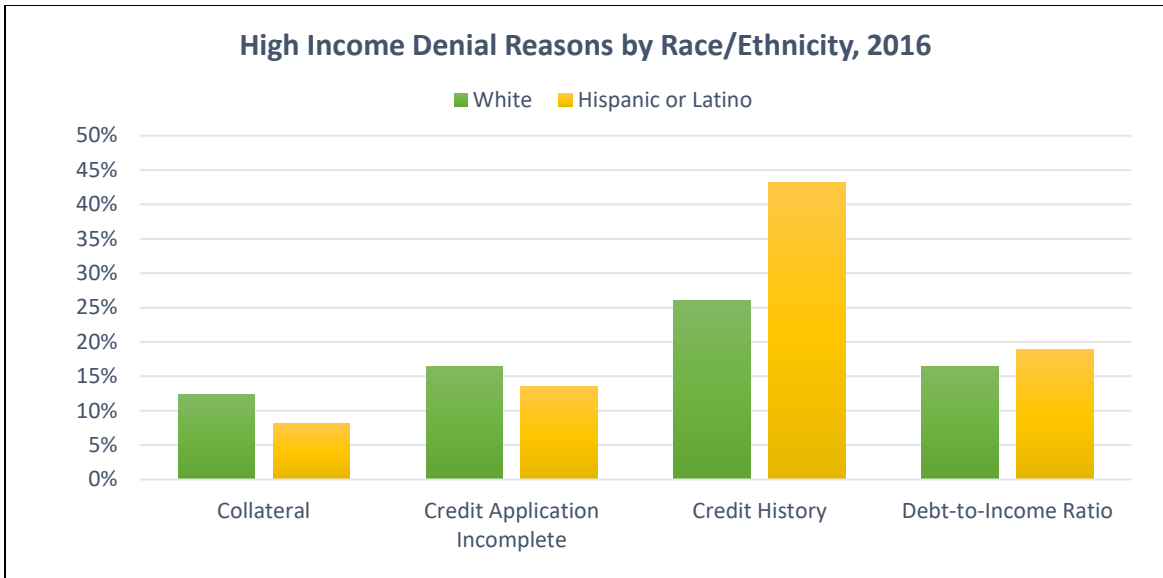
Lubbock, shown below, demonstrates that High Income Hispanics (having greater than 120 of Area Median Income) were more likely to be denied for a single family home purchase, at 5 percent, than Low Income Whites (having less than 80 percent of Area Media Income), at 4 percent. Additionally, Low Income Blacks were the group with the highest home purchase denial rate at 19 percent, over 4 times the rate of Low Income Whites. High Income Whites were denied at a rate of under 2 percent, the lowest of all groups examined. Further, White applicants demonstrated the lowest disparity in denial rates between low- and high-income applicants, at 2 percent, while the gap between low- and high-income Blacks was approximately 16 percent.



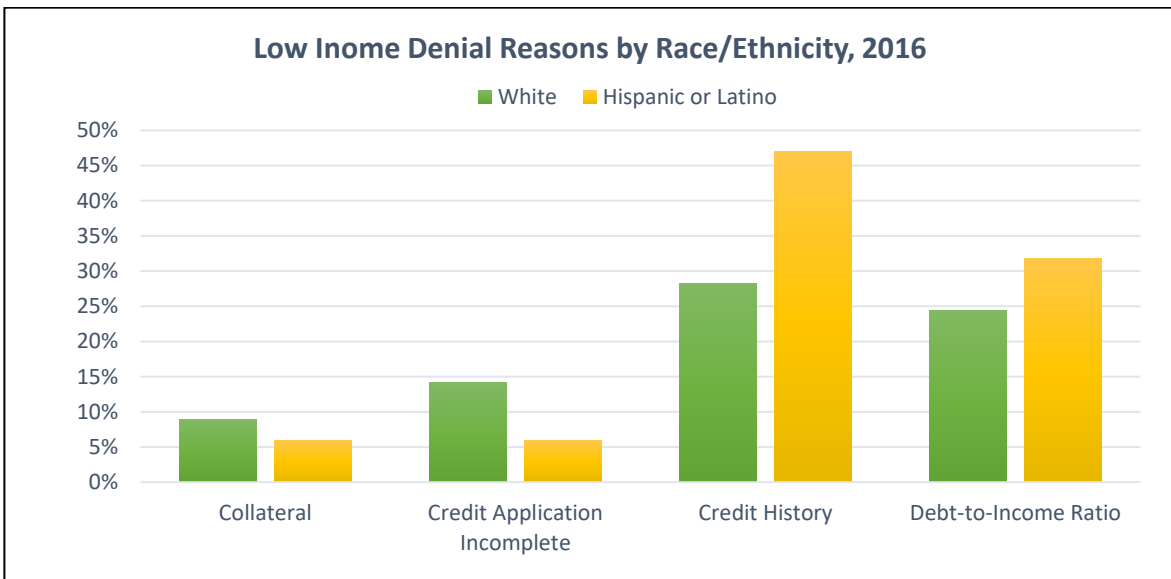
Application Denial Reasons by Income Group

The below charts compare denial reasons among White and Hispanic applicants in Lubbock for 2016 by income group. Black and Asian applicants are excluded due to insufficient data.

As of 2016, the leading denial reason for High Income Hispanic applicants by a strong margin was credit history, representing approximately 43 percent of all denials. By contrast, denial reasons for High Income White applicants were more evenly distributed, though credit history was also the most common denial reason at 26 percent. High Income Whites were about 1.5 times as likely to be denied for lack of collateral relative to High Income Hispanics while High Income Hispanics were nearly twice as likely to be denied for credit history.



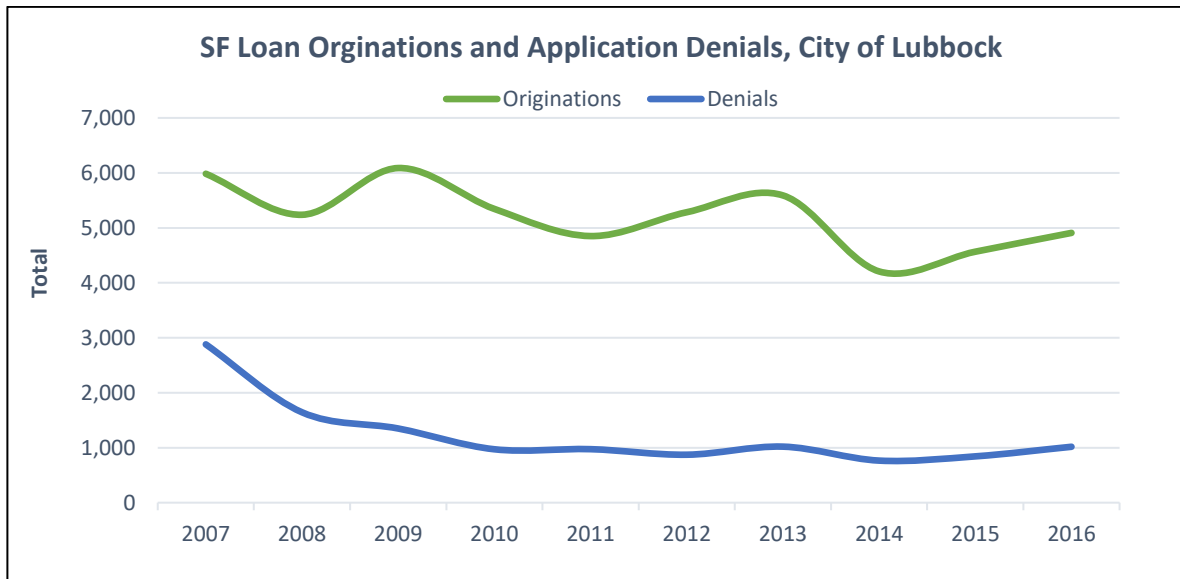
For Low Income denials, credit history was the top reason for both Whites and Hispanics in 2016, similar to High Income denials. However, both Low Income White applicants and Low Income Hispanic applicants were denied for debt-to-income ratio and credit history at a higher rate than their High Income counterparts, and in the case of Low Income Hispanics, the debt-to-income difference was nearly double.



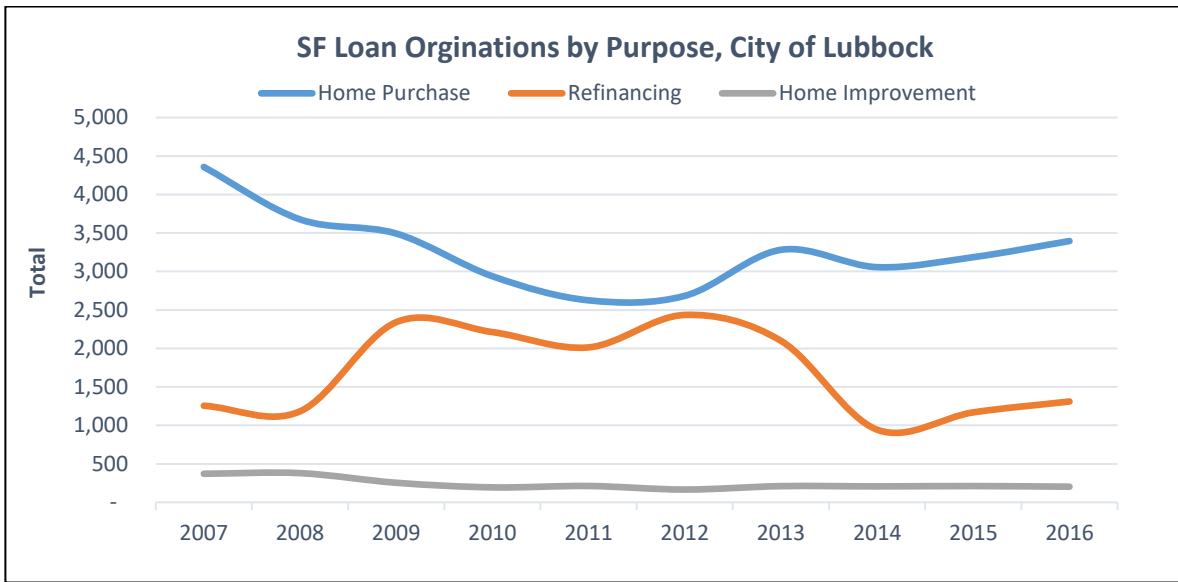
Lubbock's Single Family Lending Market, 2007-2016

The following section will examine HMDA data over the time period 2007-2016, for the City of Lubbock.

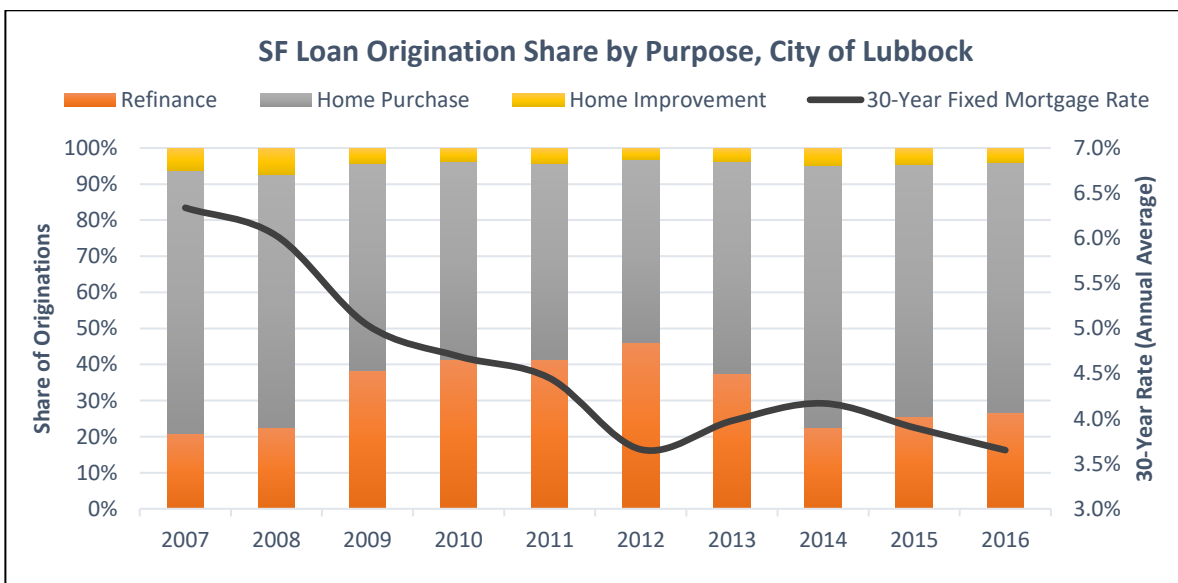
Highlighted below, the number of single family loan originations in Lubbock followed a dynamic trajectory between 2007 and 2016. At the onset of the housing crisis, originations declined between 2007 and 2008, followed by an increase between 2008 and 2009, in contrast to many other locations. Subsequently, originations trended downward between 2009 and 2011, followed by an increase between 2011 and 2013. Loan originations then fell by 25 percent between 2013 and 2014, though grew steadily between 2014 and 2016. As of 2016, total originations in Lubbock are about 82 percent of the level prior to the housing crisis. In contrast to originations, however, the number of application denials within Lubbock demonstrated less extreme changes between 2007 and 2016, falling dramatically between 2007 and 2010, then generally stabilizing for the remaining analysis years. As of the most recent data year, denials are 65 percent below the level experienced in 2007 but 5 percent higher than 2010 levels. Similarly, the share of denials as a percent of total originations and total denials has declined markedly since the housing bust, from 33 percent in 2007 to approximately 17 percent as of 2016.



Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2016 were the result of refinancing originations. Though home purchases represented the top loan purpose by total originations for every year examined, refinancing narrowed the gap between 2009 and 2013, as interest rates were broadly falling, discussed further below. In 2016, home purchases comprised 70 percent of the City's total originations. The consistent growth of home purchase originations since 2014 (11 percent growth rate between 2014 and 2016), reflects a recovering demand for housing within the City.

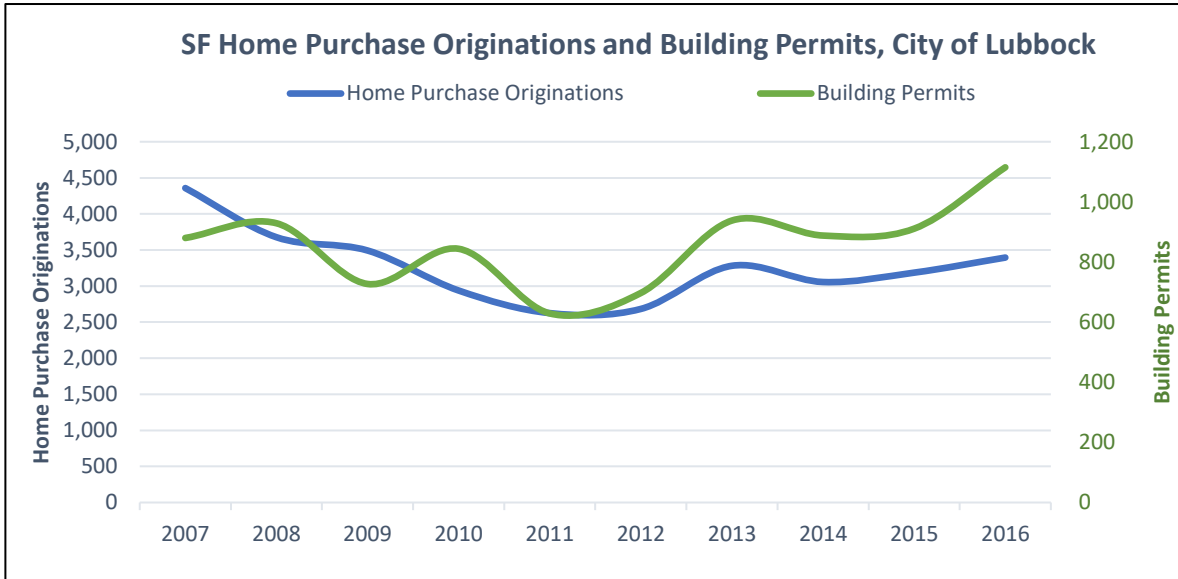


The share of refinance originations appears to move generally with the 30-year fixed rate mortgage average, shown below. In 2012, for example, when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations in Lubbock reached the highest level in both absolute number and percentage terms of all years examined. The decrease in the annual average of the 30-year fixed mortgage rate between 2014 and 2016 is consistent with Lubbock’s 39 percent growth in the number of refinance loan originations over the same time period.



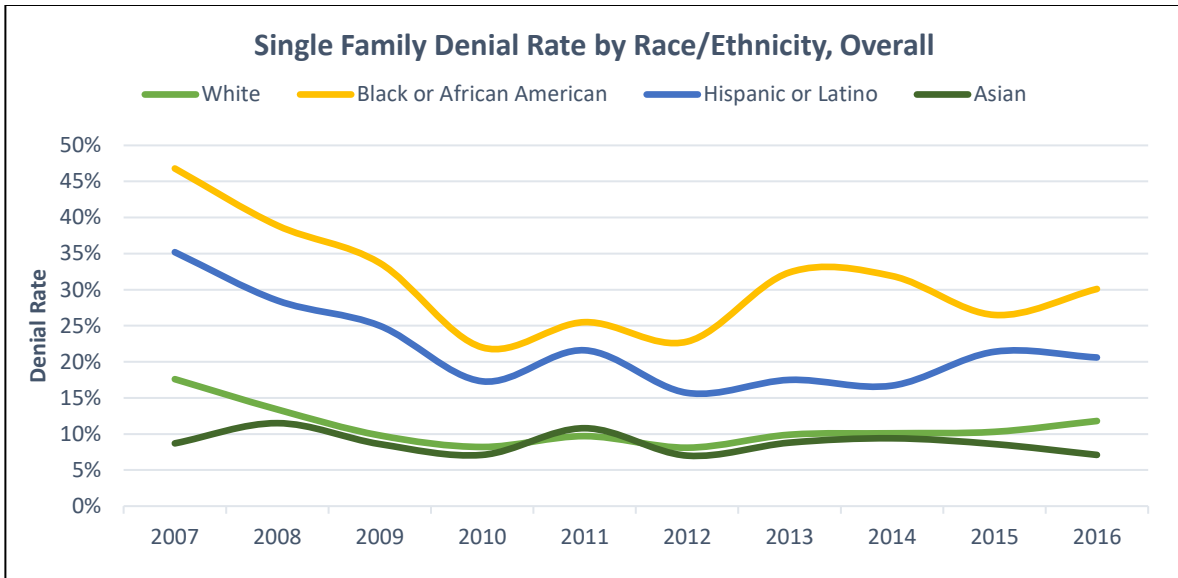
Source: HMDA, Federal Reserve Bank of St. Louis

For home purchase loans, the movement of originations can often track trends in the number of single family building permits issued, as shown below. Though the growth rate of building permits has exceeded the growth rate of home purchase loan originations since 2011, both trends are indicative of recent growth in housing demand within the City.

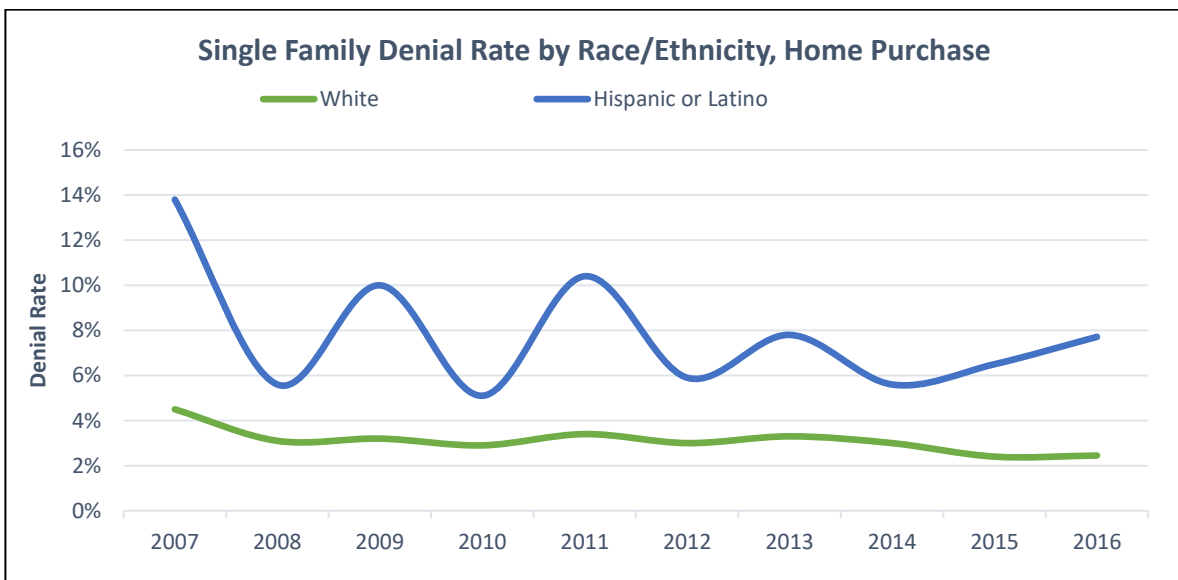


Income, Race, and Single Family Loan Denials in Lubbock

Denial rates for single family loans in Lubbock vary over time vary by race and ethnicity. The charts below show that between 2007 and 2015, White and Asian applicants were less likely to be denied relative to Hispanic and Black applicants for all years examined. The overall denial rate for Hispanic applicants has fallen significantly during the analysis period, from 35 percent to 21 percent, though the overall disparity between Hispanic and White applicants remains, with Hispanic applicants approximately 1.7 times more likely to be denied than White applicants as of 2016, down from twice as likely in 2007.

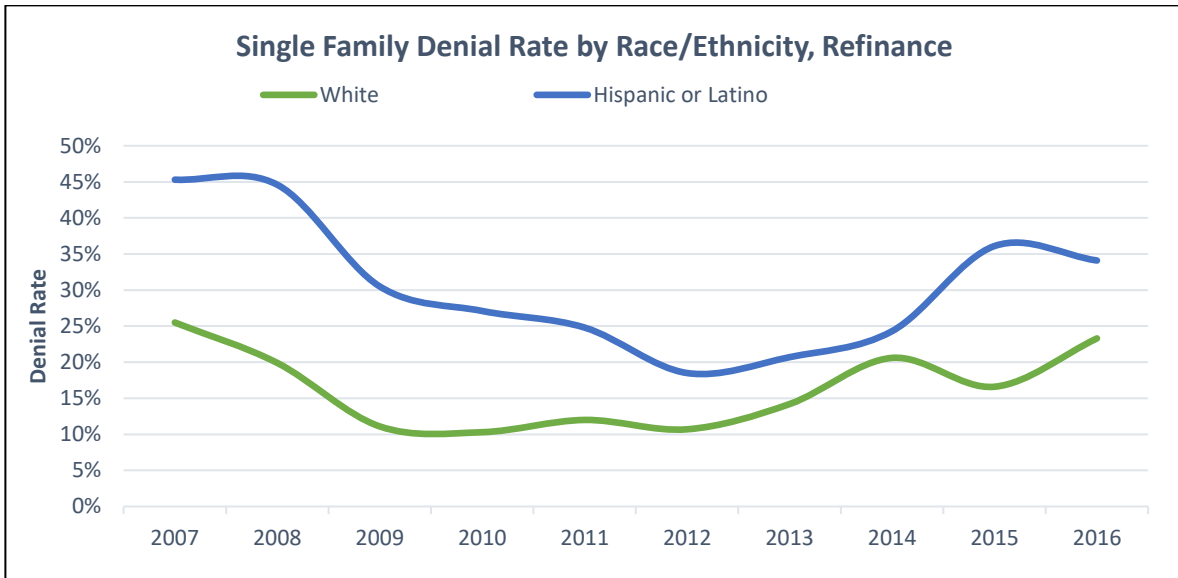


Home purchase applications exhibit lower denial rates for both White and Hispanic applicants relative to overall denial rates. However, relative to other loan purposes, the gap between Hispanic and White applicants is greatest. For example, Hispanics were more than 3 times as likely to be denied for a home purchase relative to White applicants in 2007, an observation that still held true as of 2016. Similar to overall denial rates, Whites were the least likely of the two groups to be denied for every year examined.

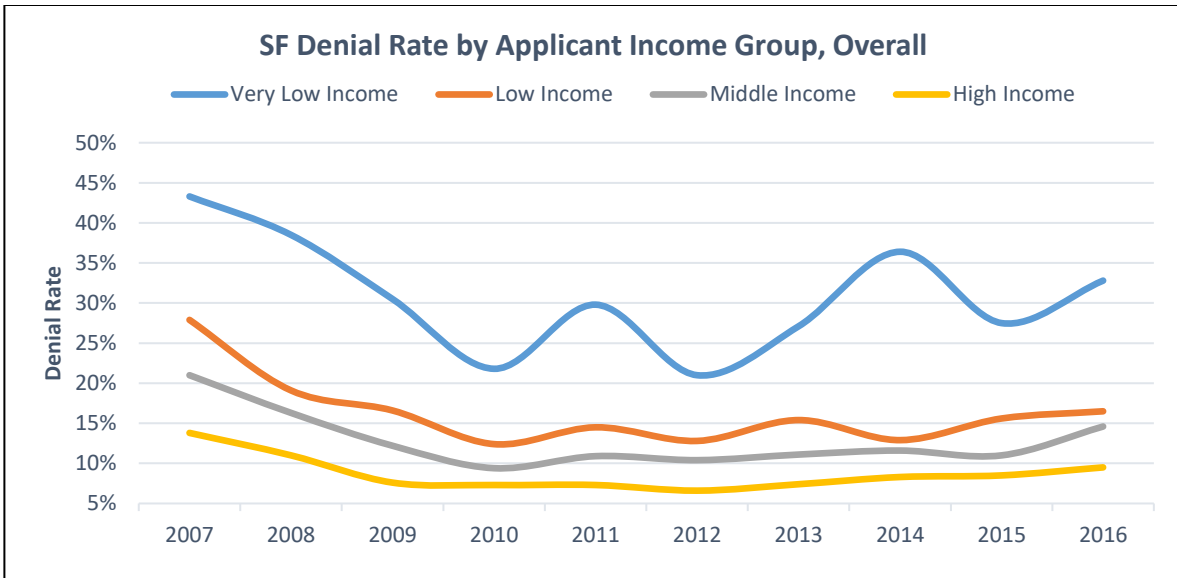


Consistent with the overall denial rate as well as the denial rate for home purchases, Whites were the group with the lowest denial rate for a refinance application in all study years. In contrast to other loan purposes, refinance denial rates increased between 2015 and 2016 for Whites, while

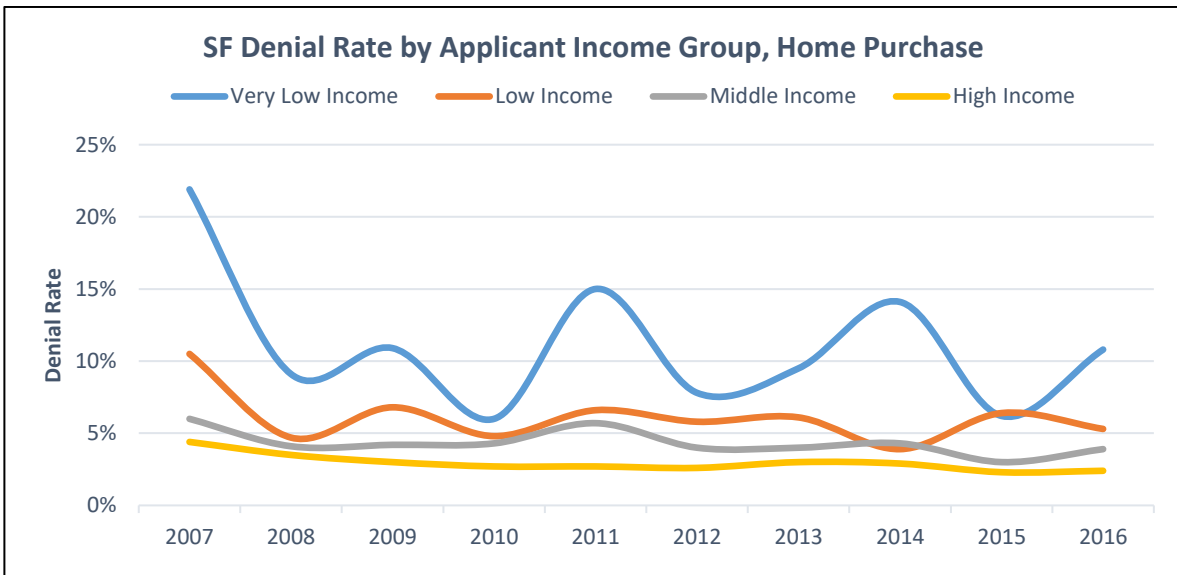
decreasing during the same time period for Hispanics. Of all loan purposes, the gap between Hispanic and White applicants is lowest for refinance, with Hispanics slightly less than 1.5 times as likely to be denied.



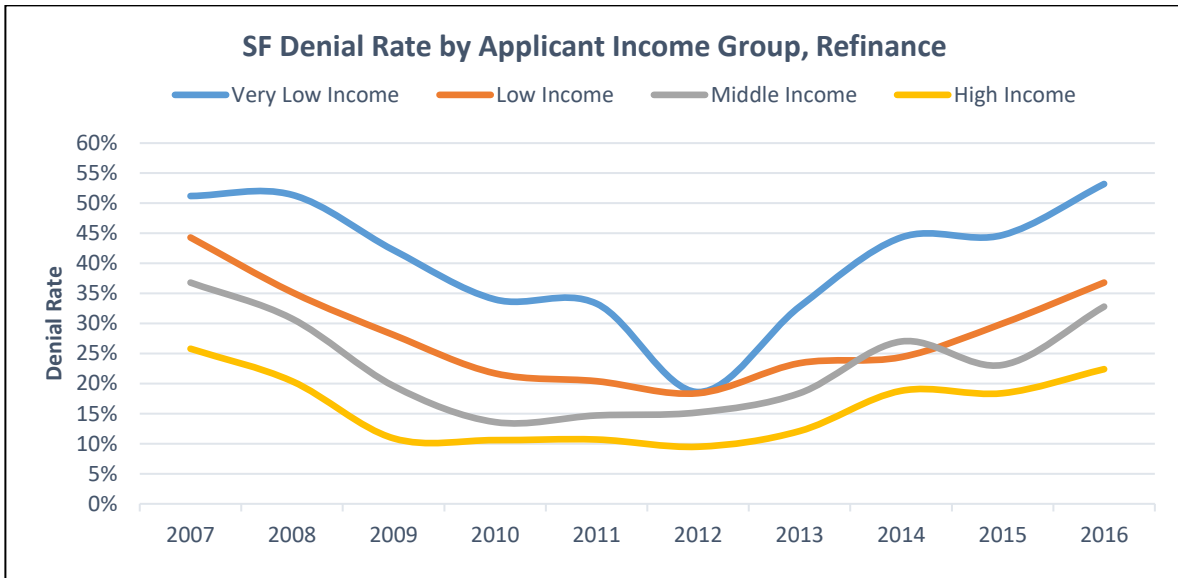
A view of single family denial rates by applicant income group within Lubbock, highlighted below, shows the expected outcome of higher income groups experiencing lower denial rates relative to lower income groups. However, Very Low Income applicants (50 percent or less of Area Median Income) have faced particularly high denial rates relative to other groups during the time period examined. High Income (greater than 120 percent of Area Median Income) applicants were consistently the group with lowest denial rate, while Middle Income (80 to 120 percent of Area Median Income) applicants and Low Income (between 50 percent and 80 percent of Area Median Income) applicants followed behind, respectively. The single family denial rate for all income groups declined between 2007 and 2016, though rose for all income groups between 2015 and 2016.



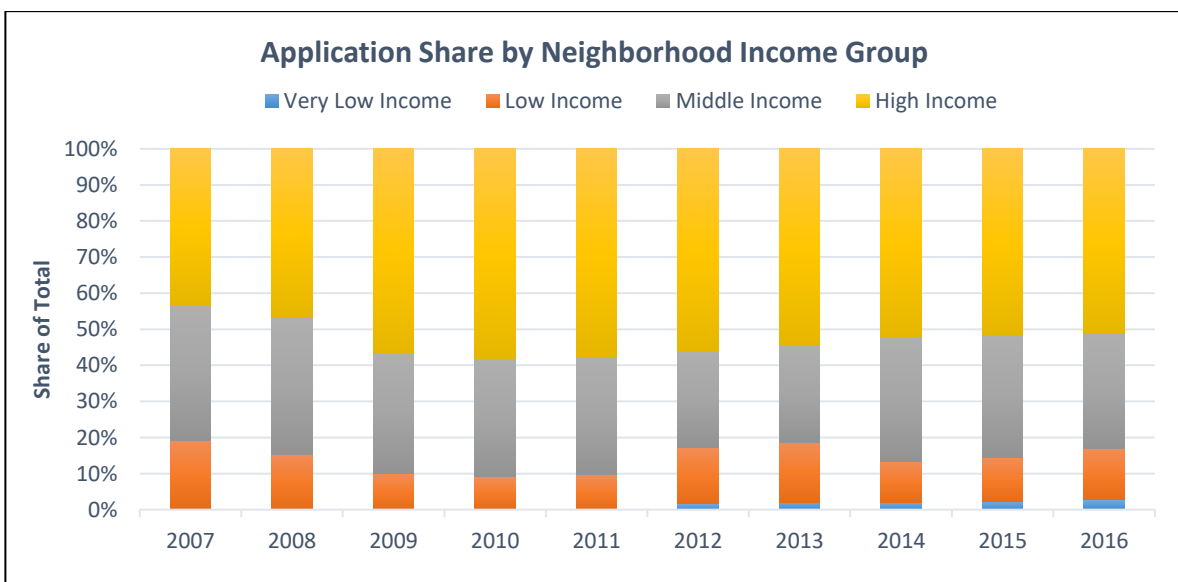
Similar to overall denial rates by income group, home purchase applications were denied between income groups in a relatively consistent pattern between 2007 and 2016. Though High Income applicants were the least likely to be denied for all years examined, Low Income applicants experienced a lower denial rate than Middle Income applicants in 2014, and Very Low Income applicants experienced a lower denial rate the Low Income applicants in 2015.



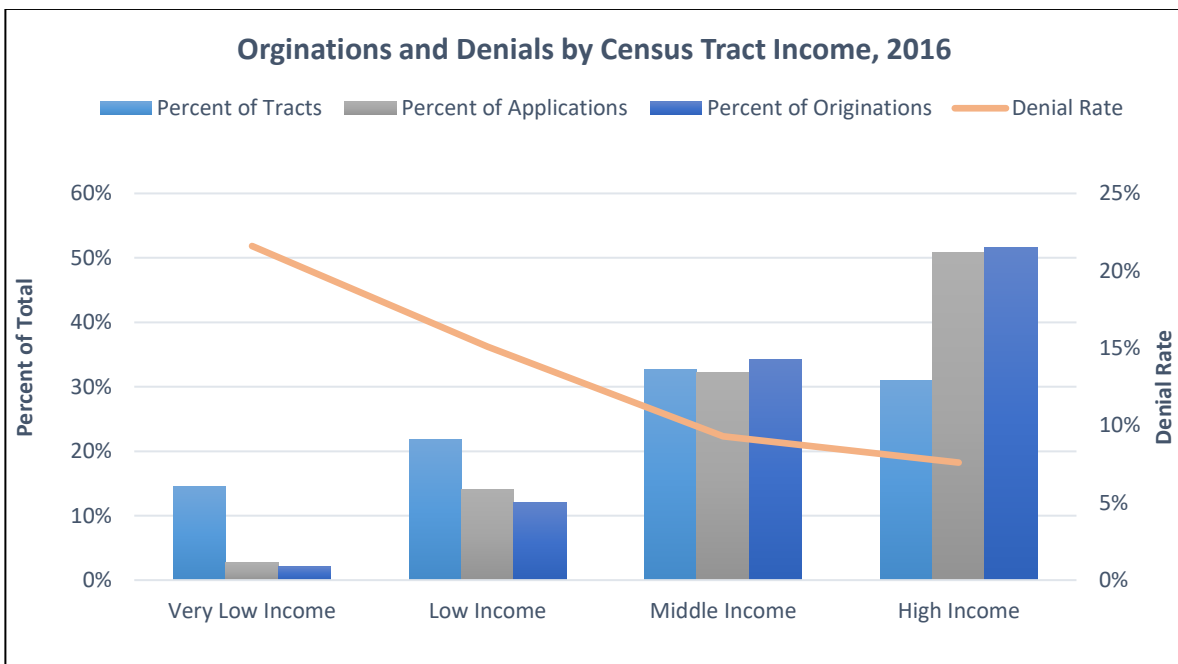
For all income groups, denial rates for refinance applications were higher than overall denial rates as well as those for home purchases as of 2016. Additionally, the refinance denial rate for all income groups has more than doubled since 2012.



As a percentage of total applications within Lubbock, the distribution among neighborhoods by income group (defined as median income of property’s Census tract) shows that for every year examined, High Income neighborhoods represented the largest share of applicants, and for every year since 2009 represented the majority of lending applications.

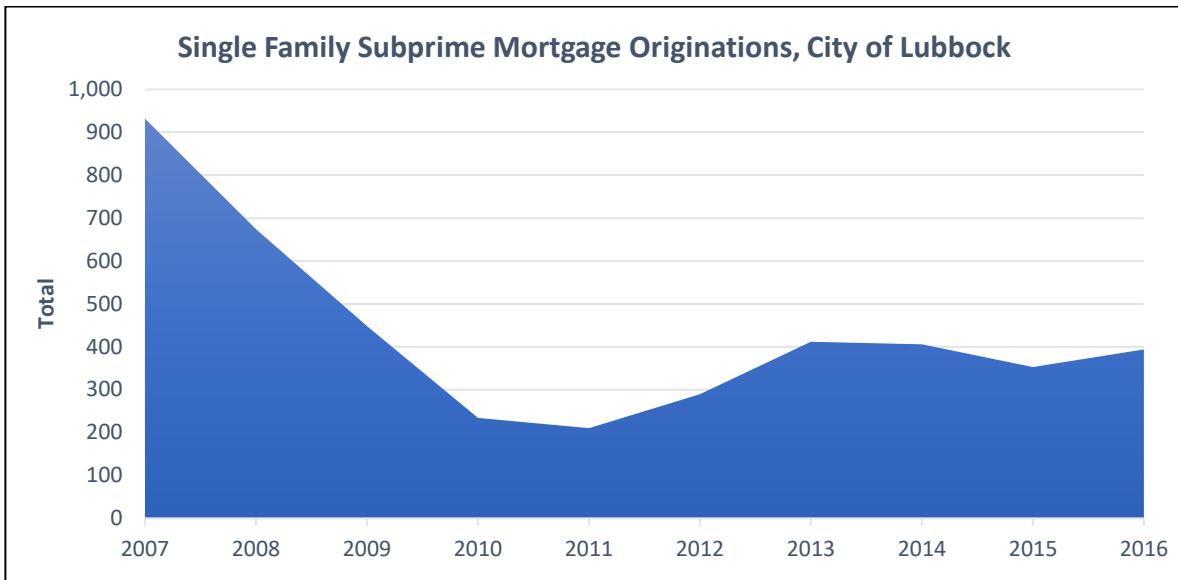


Within Lubbock, Very Low Income and Low Income neighborhoods represent 36 percent of the City’s total neighborhoods, although they are represented by approximately 14 percent of total originations and 17 percent of total applications as of 2016, shown below. This suggests that Low and Very Low Income neighborhoods within Lubbock are less likely to participate in the single family lending market relative to other neighborhoods. By contrast, loan applications and originations within Lubbock are disproportionately likely to occur for properties in High and Middle Income neighborhoods. For example, High Income neighborhoods represent 31 percent of the City total, though they accounted for 51 percent of applications and 52 percent of all single family loans originations throughout the City in 2016.



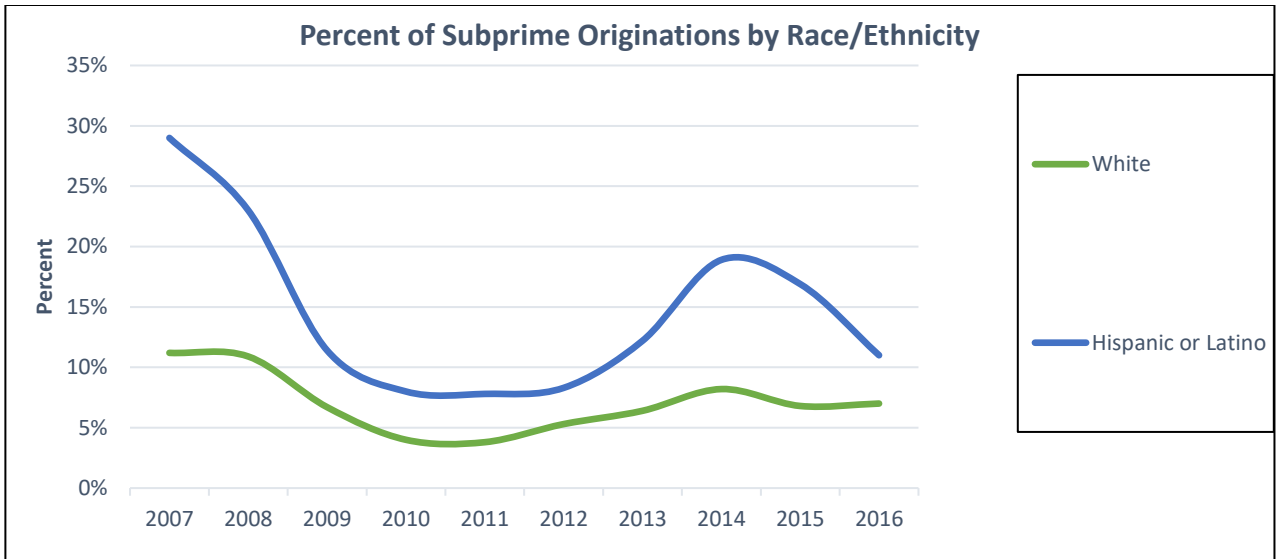
The Subprime Market

Illustrated below, the subprime mortgage market in Lubbock declined significantly between 2007 and 2010, though increased between 2011 and 2013, before stabilizing to about 400 per year (approximately 42 percent of the 2007 total). Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5 percent. The total number of subprime loan originations decreased by approximately 58 percent on net between 2007 and 2016, while prime originations decreased by 11 percent during the same time period. Since 2010, however, the number of subprime loan originations has grown by 68 percent, compared to a decrease of 12 percent for prime originations. As a percent of Lubbock’s total, subprime originations declined from 16 percent to 8 percent between 2007 and 2016.

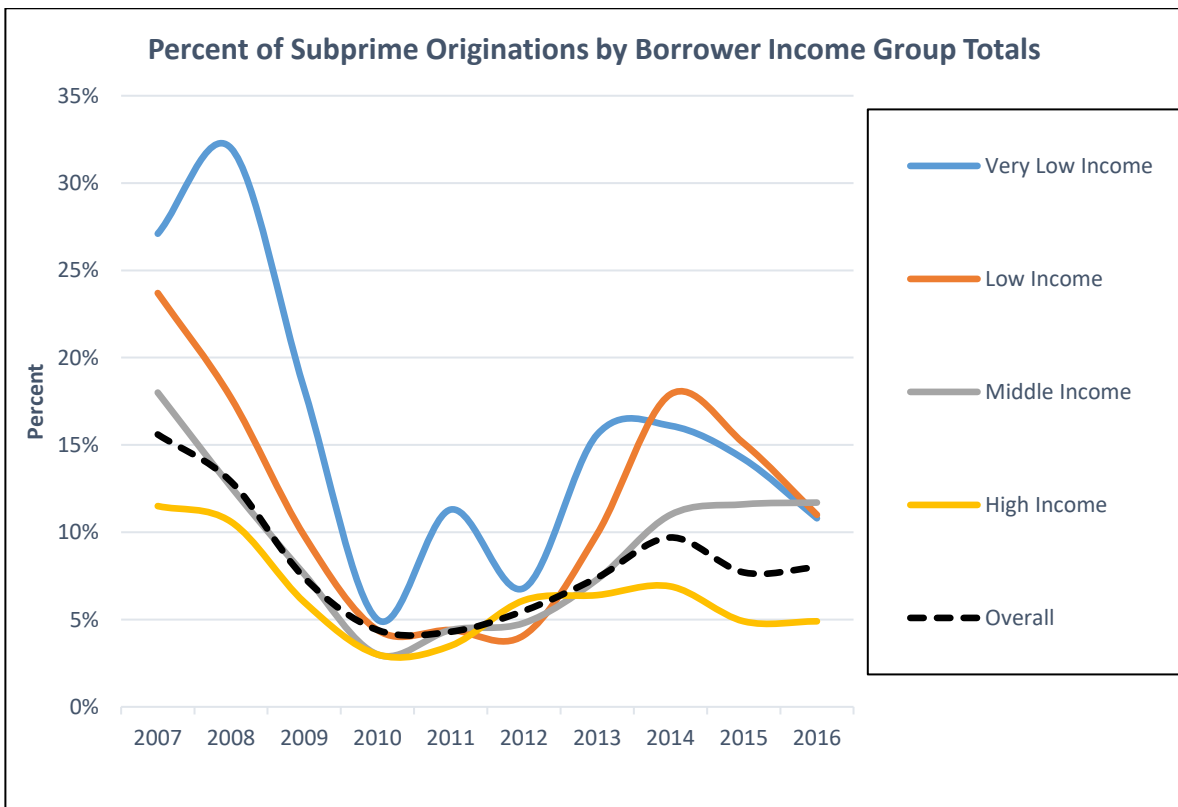


Looking at the share of subprime loans as a percentage of total originations by race/ethnicity reveals that Hispanic loan recipients were approximately 2.6 times as likely to be subprime relative to White loan recipients in 2007. This trend is consistent with the broader national pattern of minorities being disproportionately subjected to predatory subprime lending leading up to the housing crash, as outlined in a post-crisis report by the US Department of Housing and Urban Development.¹ The period between 2007 and 2010 saw the subprime share for Hispanic borrowers decline substantially, falling from 29 percent to 8 percent. Though the subprime share for both White and Hispanic borrowers remained below 10 percent between 2010 and 2012, the subprime share for Hispanics increased between 2012 and 2014 to 19 percent. The Hispanic subprime share then fell to 11 percent between 2014 and 2016, and as of 2016, Hispanic borrowers are 1.6 times as likely to be subprime relative to White borrowers, lower than before the financial crisis. Relative to the pre-crisis share of subprime originations, White and Hispanic originations are both at approximately 60 percent of the 2007 share, at 61 and 58 percent respectively.

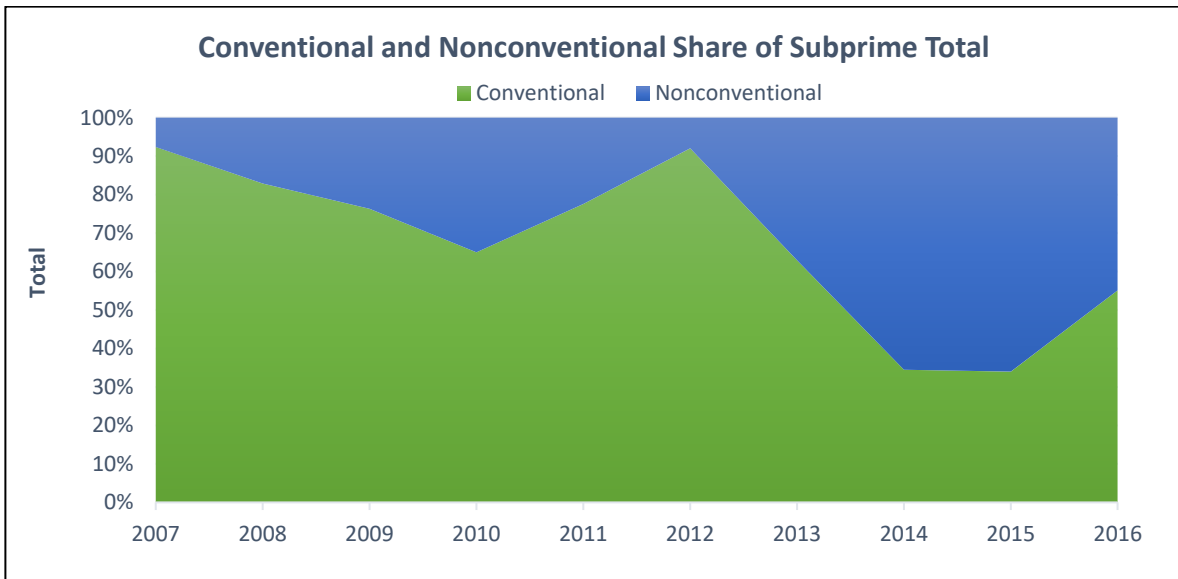
¹ https://www.huduser.gov/portal/publications/foreclosure_09.pdf



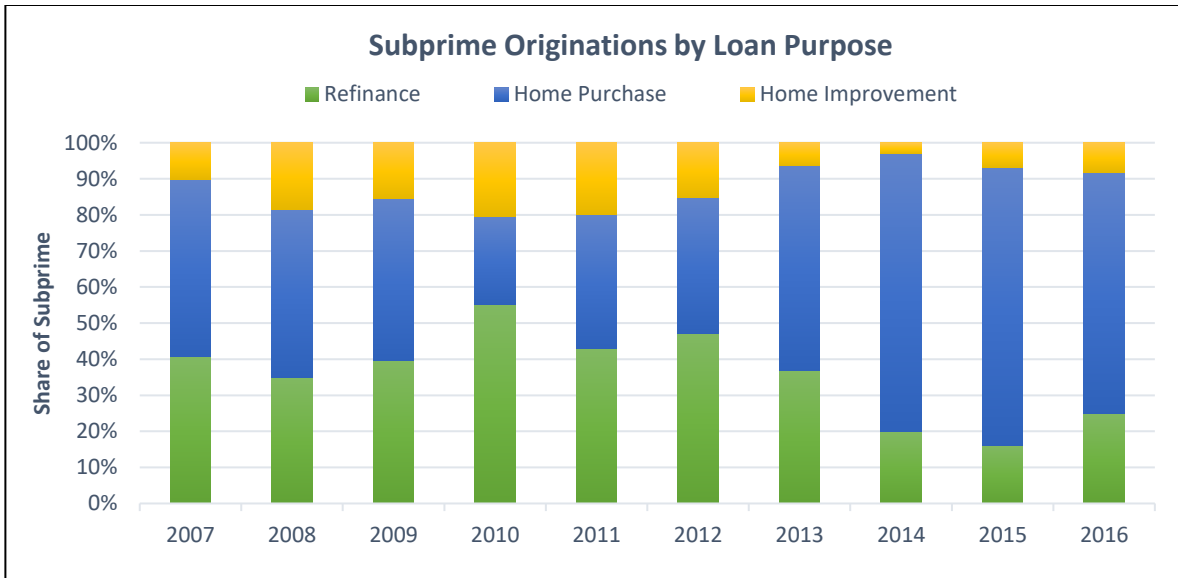
A view of subprime originations by income group totals shows a sharp decline between 2007 and 2010 among all groups, with overall increases from 2011 to 2014. Between 2014 and 2016, however, subprime shares for all income groups except Middle decreased, with changes most pronounced in the Low and Very Low Income borrower groups.



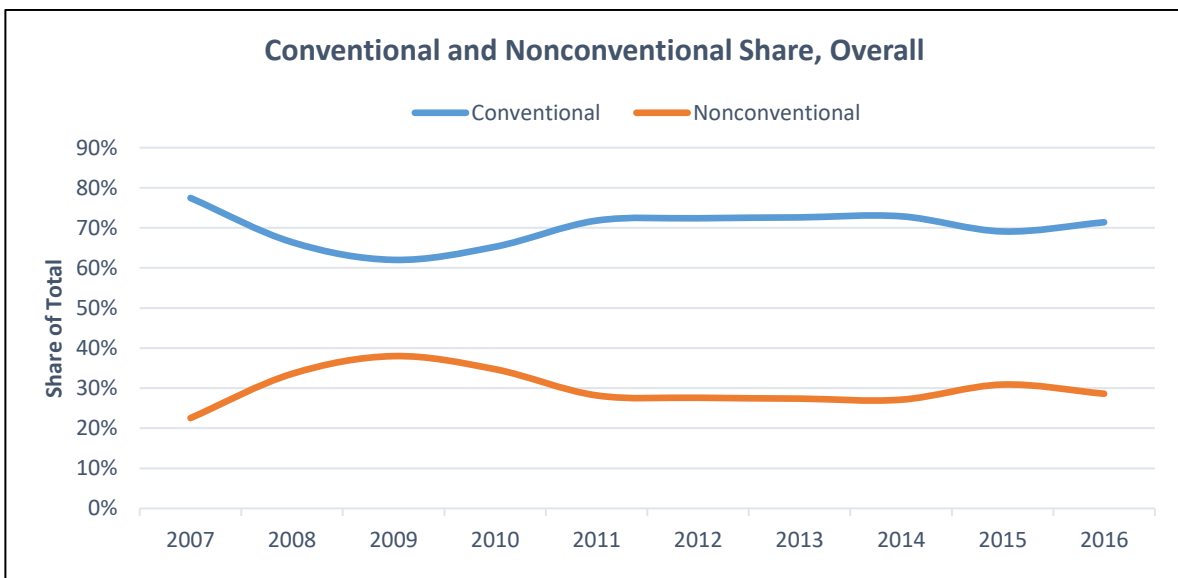
Consistent with broader national trends, the composition of subprime loans within Lubbock has shifted from conventional loans to government-insured nonconventional loans in recent years. In 2007, over 92 percent of subprime loans within the City were originated by conventional lenders. As of 2016, that percentage 55 percent percent, up from a low of 34 percent in 2015. Of the nonconventional subprime loans originated in Lubbock, the overwhelming majority are insured by the Federal Housing Administration (over 99 percent in 2016). By contrast, the FHA’s share of nonconventional prime loans is 75 percent.

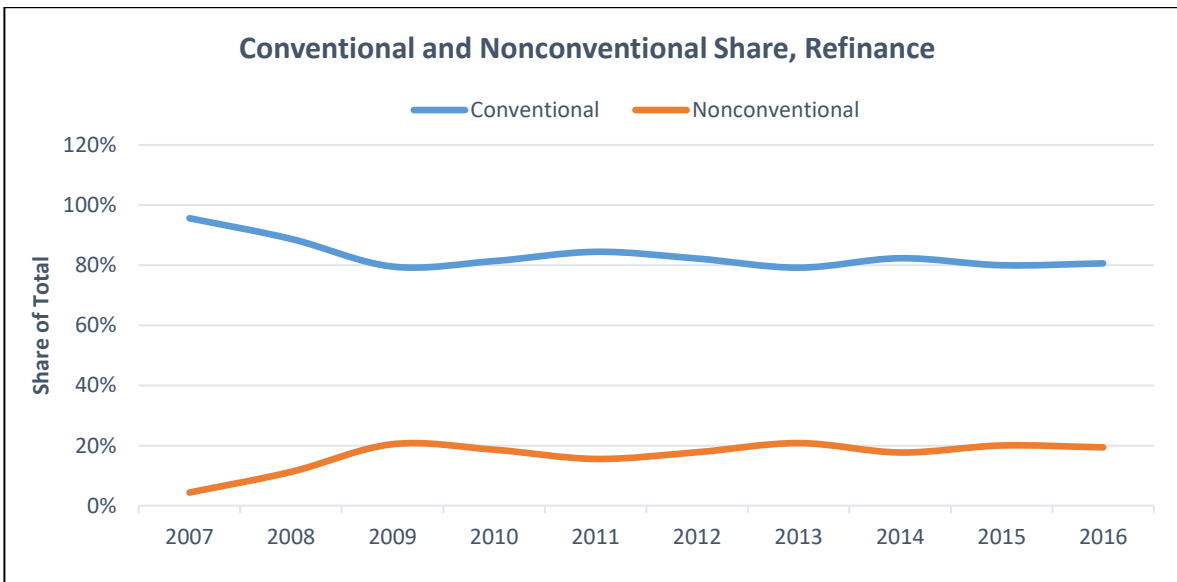
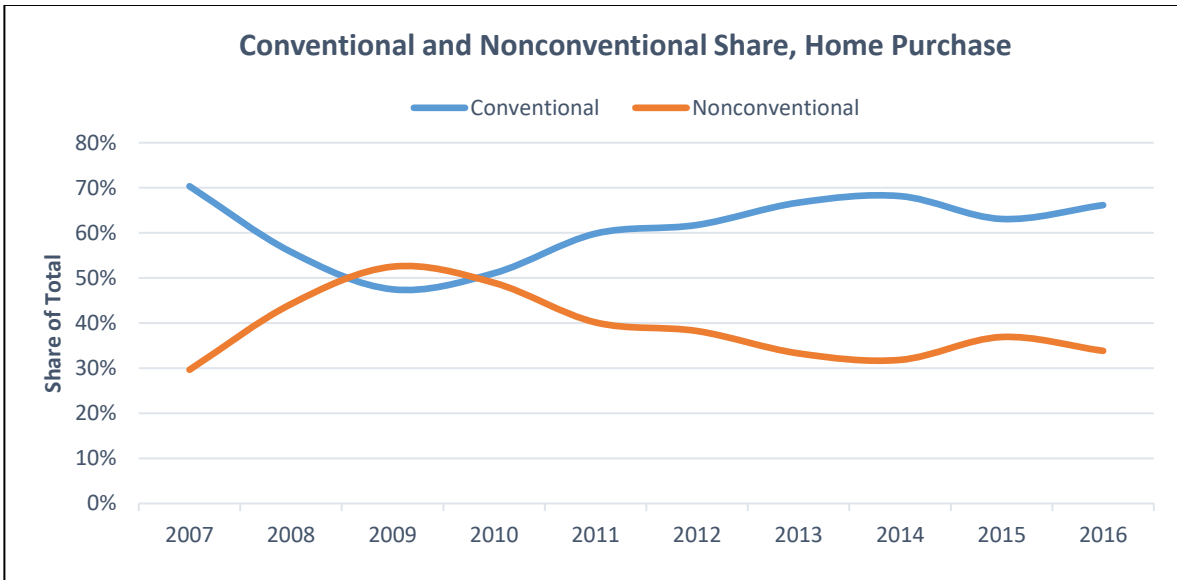


As a percentage of all subprime loan originations within Lubbock, home purchases represented 67 percent in 2016, up from 49 percent in 2007 and a low of 24 percent in 2010, though down from a peak of approximately 77 percent in 2014.



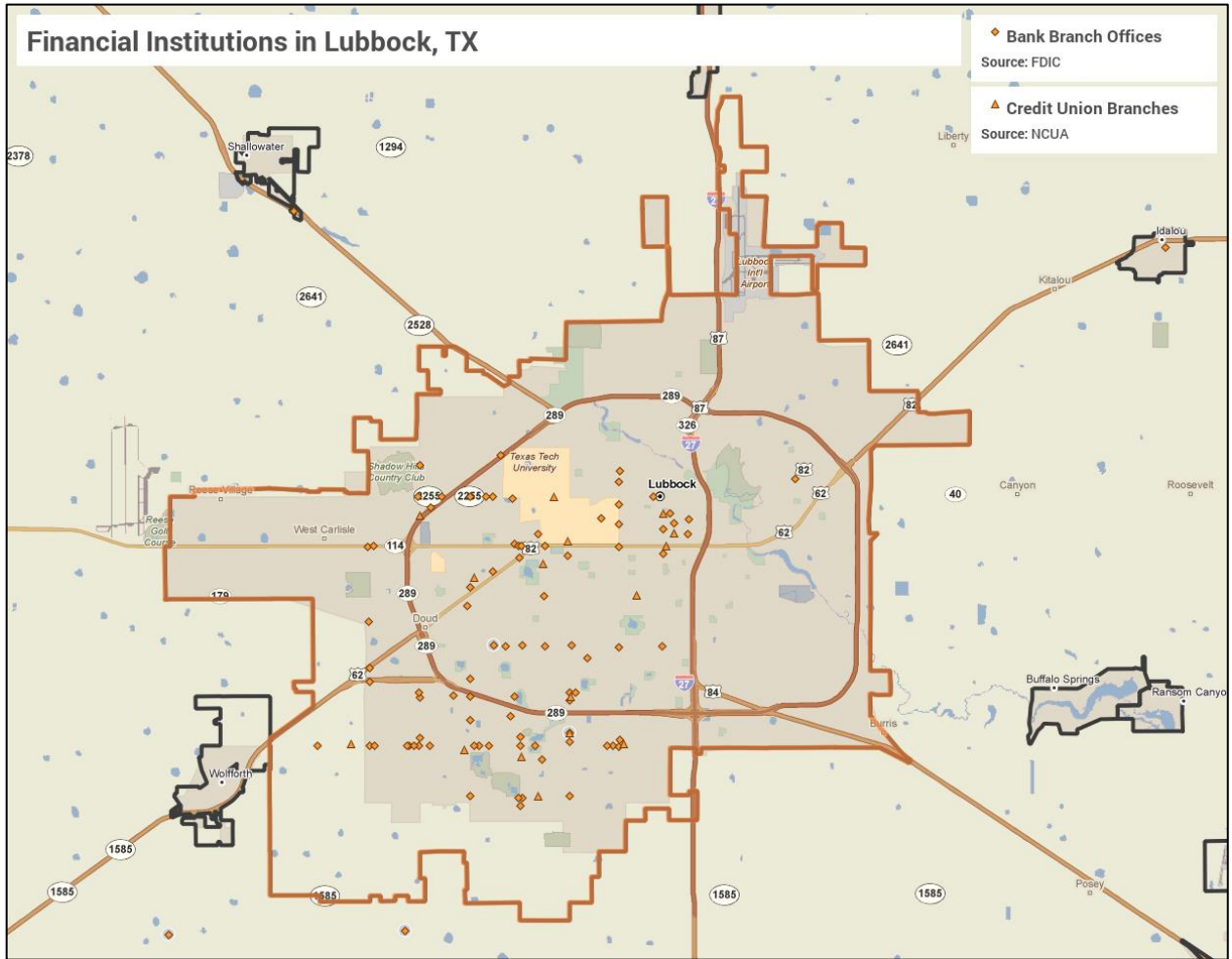
Though subprime loans within Lubbock are mostly nonconventional, 71 percent of all single family originations in 2016 were from conventional lenders. The only loan purpose that for any year was characterized by a majority of nonconventional originations was home purchase loans in 2009, at the peak of the housing crisis. The share of conventional lending in Lubbock is consistent with its prevalence of High Income borrowers and neighborhoods.





Geographic Distribution of Financial Institutions and Loan Originations

MAP: Financial Institutions in Lubbock, TX

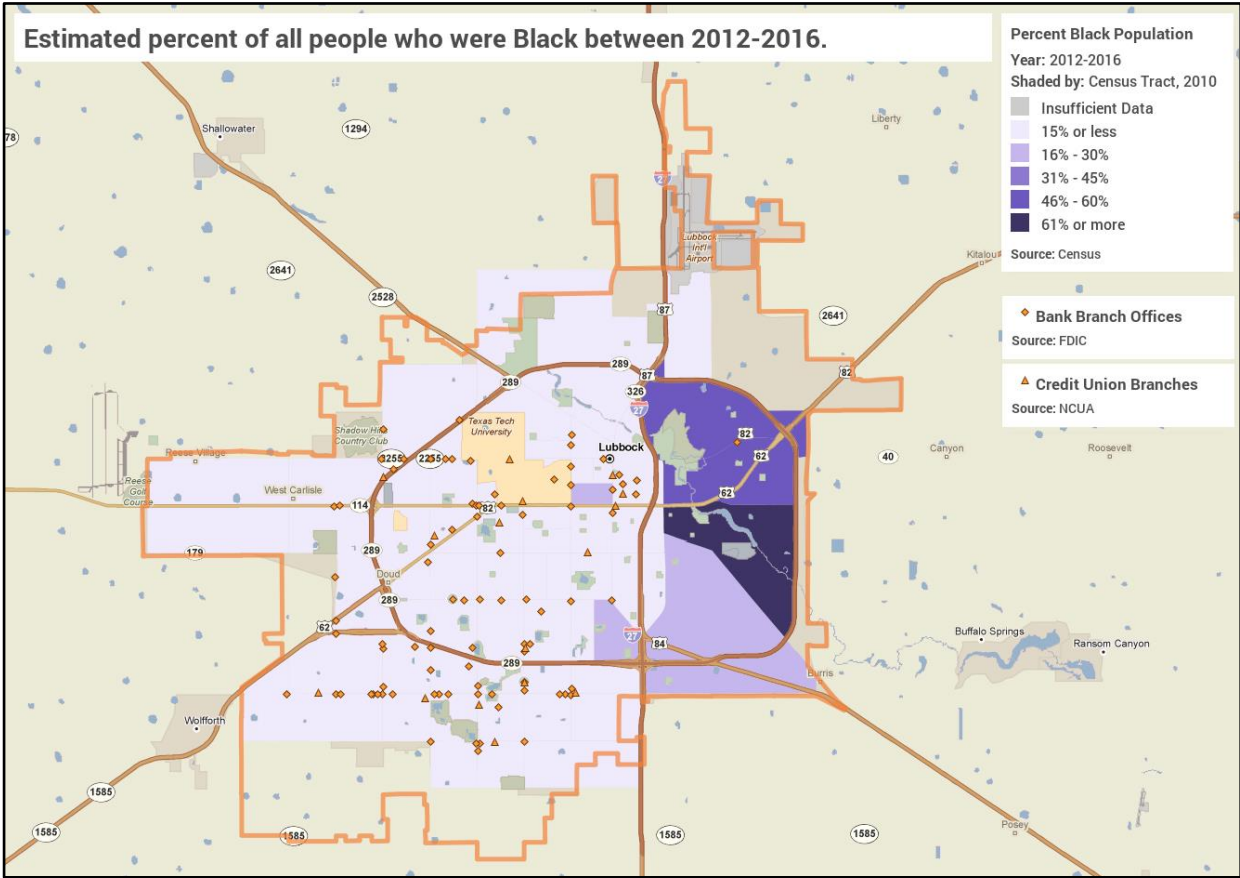


Source: Federal Deposit Insurance Corporation, 2017 (FDIC) and National Credit Union Administration, 2016 (NCUA) via PolicyMap

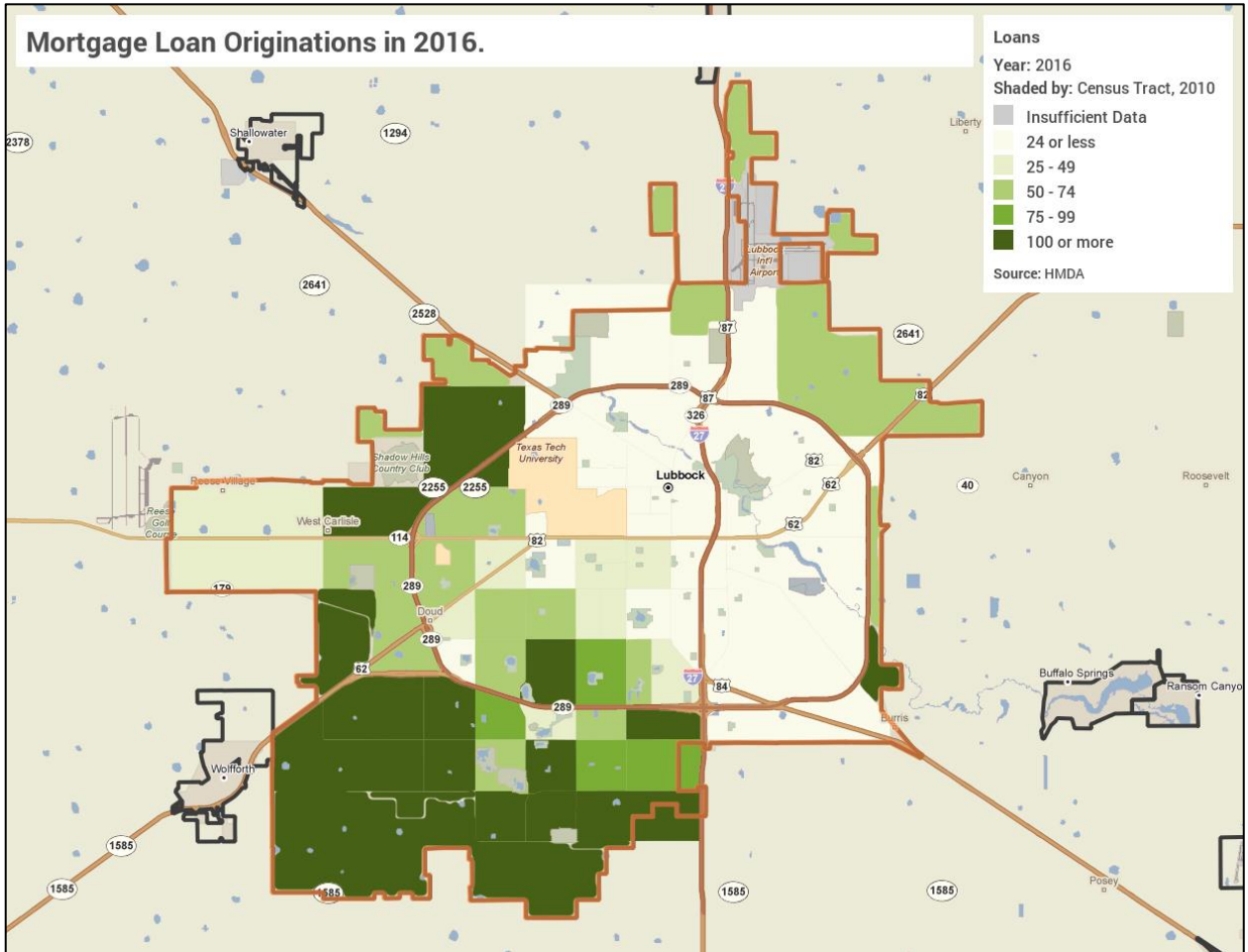
The map above displays the location of financial institutions within the City of Lubbock. Financial institutions are primarily clustered on the west side of the city and only one bank is available east of I-27. A lack of accessible financial institutions can be a potential cause of disparities in access to opportunities, particularly when the areas without access have relatively large minority populations.

The following map overlays the presence of financial institutions with the percentage of the population that is Black. Clearly, majority Black census tracts have limited access to financial institutions. Much like a lack of access to grocery stores creates a food desert, the east side of Lubbock is a bank desert. Residents are stuck choosing between traveling a great distance to the bank or utilizing other, less-optimal options for check cashing and loan

MAP: Financial Institutions and Black Population



MAP: Mortgage Loan Originations in 2016



Source: 2016 HMDA (Home Mortgage Disclosure Act) via PolicyMap

The above map displays the number of home loans issued by census tract. There is a stark difference in the number of mortgage originations made between the southwest areas of the City as compared to the northeast and eastern areas of Lubbock. The southwest areas of the city are predominately White and have lower poverty. In contrast, the northeast and eastern areas of Lubbock have higher concentrations of poverty and a higher concentration of minority populations. The School proficiency Index, Labor Market Index, and Low Poverty Index also all scored lower in the east side of the City.

Conclusion

Mortgage lending activity in Lubbock is consistent with many of the broader trends that have occurred in the wake of the housing bust, Great Recession, and subsequent economic recovery.

Further, Lubbock exhibits relatively strong mortgage market fundamentals. Home purchase originations have increased every year since 2014, suggesting signs of growing housing demand and

a housing market recovery. Additionally, the share of refinance application denied for lack of collateral, suggesting an “under-water” home, has declined since the peak of the housing crisis.

The City has also been subject to cyclical trends that reflect broader economic conditions in recent years, including changes in mortgage rates that influence the prevalence of refinance originations. The subprime market remains well below its peak prior to the housing bust and government-insured mortgages have increased, consistent with tighter credit conditions and a more active regulatory environment in the wake of the housing crash.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for minority applicants relative to White applicants, in addition to higher denial rates for lower income applicants and neighborhoods.

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

The previous Analysis of Impediments to Fair Housing for the City of Lubbock identified the following impediments that are still relevant today.

Real Estate Impediments

Housing Affordability – There is a lack of affordable housing and financing for affordable housing is limited. Local developers, agencies, and individuals identified a lack of available financing as the primary barrier to producing new affordable and subsidized housing. The Median Gross Rent in Lubbock has continued to climb since 2011 which has reduced the supply of affordable units in the City.

Development Constraints – Construction projects for affordable housing are limited due to the supply of available land. There are legal and tax constraints on developing inner city land which makes infill projects challenging and costly. This limited supply drives up the cost of land, but land owners still often overestimate the value of their land making purchases costly or impossible. Construction costs are also on the rise and many communities are facing a construction labor shortage due to a lack of skilled labor, stricter immigration policies, and an inability to recruit a younger generation into the construction labor market.

Public Policy Impediments

Lack of Public Awareness of Fair Housing: The City of Lubbock lacks local Fair Housing legislation that is equivalent or more substantial than the federal fair housing law. Fair Housing complaints are reported to the Fort Worth, Texas FHEO division of the Regional Office of the US Department of Housing and Urban Development. Participants in past focus group sessions stated that there was only limited public knowledge about fair housing. The City must pay particular attention to the Spanish-speaking and immigrant community due to the additional vulnerability they face.

Fair Housing Services Needed: Additional fair housing services and outreach is needed in the community. There is a limited awareness of federal and State fair housing laws and the protections available for protected classes.

Socio-Economic Impediments

Elderly Persons and Households: Many communities across the nation are facing an aging population as residents retire and live longer. Their lifestyles change, and additional resources must be available to accommodate these changes. Senior citizens need smaller units with lower maintenance costs to fit with their fixed income, as well as a robust public transportation system.

Persons with Disabilities: A certain percentage of units in residential complexes must be ADA compliant for residents in wheelchairs or other impairments. Despite these requirements, the demand for accessible units exceeds the available supply. It is particularly difficult for persons with disabilities to secure affordable housing due to reduced economic opportunities and additional needs.

Homeless Individuals: Homelessness is a complex impediment due to the variety of issues at play. Residents who are homeless or at risk of homelessness often face medical, economic, and social issues that contribute to their situation. Insufficient income is the primary barrier for homeless residents, particularly those that rely on Supplemental Security Income or Social Security Disability Insurance. Additional issues faced by homeless individuals is discrimination, poor credit history, and a history of evictions or legal problems.

People become homeless when they are unable to acquire housing or continue to live in their home. The causes of homelessness vary widely from loss of affordability and job loss to disabilities and domestic violence. For this reason, a holistic and comprehensive coordinated approach to assisting individuals and families who are homeless or at-risk of becoming homeless is essential to returning them to self-sufficiency.

The South Plains Homeless Consortium (SPHC) leads the efforts to identify homeless issues and address homeless needs in the City of Lubbock and the surrounding 15-county South Plains Region. SPHC is a group of service organizations and agencies, which are committed to serving homeless people in the region and work to improve their lives through a Continuum of Care (COC). The COC is an array of available social and housing services to help homeless individuals and families and to those who are at-risk of becoming homeless to reach self-sufficiency.

While specific data for the City of Lubbock was not available, it is the primary city in which SPHC reports Point-In-Time (PIT) results for the region. A PIT count is a survey of sheltered and unsheltered homeless persons on a single night, and data provided by the survey can provide insight into the community's homeless population and reveal service gaps in the COC and region. In 2017, on January 26, SPHC held a PIT count in the region and 364 surveys were recorded. Among those in the PIT count were a total of 434 persons with 52 being children and 85 being chronically homeless.

The data below show some of the key demographics and other key indicators of the homeless population in the area from the 2017 PIT Count.

Homeless Demographics, 2017 (region)		
Age	Number	Percentage
17 years and under	0	0.0%
18-24 years	25	8.9%
25-64 years	245	87.2%
65 years and older	11	3.9%
Total	281	100.0%
Gender	Number	Percentage
Male	177	63.0%
Female	101	35.9%
Transgender	1	0.4%
Doesn't Identify	2	0.7%
Total	263	100.0%
Race	Number	Percentage
White	184	68.4%
Black or African American	56	20.8%
Asian	0	0.0%
American Indian/Alaska Native	5	1.9%
Native Hawaiian/Other Pacific	4	1.5%
Two or More	20	7.4%
Total	269	100.0%
Ethnicity	Number	Percentage
Hispanic – Yes	83	30.2%
Hispanic – No	192	69.8%
Total	275	100.0%
Household Makeup	Number	Percentage
Households w/o children	343	94.2%
Unaccompanied youth	1	0.3%
Household w/ children	19	5.2%
Other	1	0.3%
Total	364	100.0%
Source: 2017 PIT Count, South Plains Homeless Consortium		
Data Note: Not all totals add up to the total number of surveys taken due to answers not preferred to be answered.		

The reasons for individuals and families becoming homeless varied, but as surveyed through the 2017 PIT, being unemployed and being unable to pay for rent or mortgages were the top two reasons for homelessness. Substance abuse was another large reason for homelessness with 7.7% reporting, and health related reasons such as mental illness (6.3%) and physical health reasons (6.2%) were also high on the reasons for homelessness.

Reason for Homelessness, 2017		
	Number	Percentage
Unemployment	133	16.0%
Unable to Pay Rent/Mortgage	128	15.4%
Substance Abuse	64	7.7%

Kicked Out by Family/Friends	64	7.7%
Mental Illness	52	6.3%
Physical Health Reasons	51	6.2%
Domestic Violence	49	5.9%
Evicted	46	5.5%
Left Jail/Prison/Detention	46	5.5%
Divorce or Separation	40	4.8%
Criminal Record	40	4.8%
Other	26	3.1%
Loss of Public Aid	22	2.7%
Moved to Seek Work	21	2.5%
Ran Away from Home	16	1.9%
Family Illness	14	1.7%
Natural Disaster	7	0.8%
Pregnant or Parenting	5	0.6%
Aged Out or Ran Away From Foster Care	3	0.4%
Sexual Orientation or Gender Identity	2	0.2%
Total	829	100.0%
Source: 2017 PIT Count, South Plains Homeless Consortium		
Data Note: Not all totals add up to the total number of surveys taken due to some participants choosing not to answer every question.		

Female Headed, Female Headed with Children, and Large Family Households: Large families and Female-headed families often face discrimination in the housing market. There is a perception that higher rates of crime occur because of these families. The discrimination is particularly problematic when it is linked to race or ethnicity.

Ssion

Unemployed Persons: Securing affordable and stable housing is nearly impossible for unemployed residents. Without a steady income it is likely that unemployed persons may become homeless if they don't have a strong family or support network to assist them. It is important that resources are available to help unemployed residents remain housed and transition into a new job.

Neighborhood Conditions Related Impediment

Limited resources stabilize homeowners and neighborhoods: There are currently limited resources available to help lower income, elderly, and indigent homeowners maintain their home. Neighborhood decline is more likely when residents cannot maintain their individual homes. Lubbock has many aging neighborhoods that are a growing concern.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of Affordable Housing
- Source of income discrimination
- Other

For a community to see economic growth and development it is necessary to have diverse housing options. **The availability of affordable units in a range of sizes** is a factor that can create, contribute to, perpetuate or increase the severity of disproportionate housing needs in Lubbock. Of particular importance is “missing middle” housing. “Missing middle” refers to housing units that are neither large multi-family complexes nor one-unit detached structures. The following table shows the availability of housing types in select geographies. Lubbock has a higher variety of housing types than the region or state, but with only 16.2 percent of the homes in the “missing middle” there is still a need.

	1-unit, detached	1-unit, attached	2 units	3 or 4 units	5 to 9 units	10 to 19 units	20 or more units	Percent “Missing Middle” Housing
Lubbock, TX (city)	65.5%	3.7%	3.8%	4.3%	4.4%	6.6%	9.6%	16.2%
Lubbock County	66.3%	3.2%	3.4%	3.7%	3.8%	5.7%	8.2%	14.1%
Crosby County	85.0%	0.7%	3.7%	2.8%	0.4%	0.1%	0.6%	7.6%
Lynn County	81.6%	0.6%	1.3%	0.7%	1.0%	0.7%	1.0%	3.6%
Texas (state)	65.3%	2.7%	1.9%	3.2%	4.8%	6.3%	8.3%	12.6%

Source: 2012-2016 American Community Survey 5-Year Estimates, DP04
 Note: Total housing for each location does not equal 100% because two categories (Mobile Home and Boat, RV, van) have been removed from the table

Rising housing costs can lead to **displacement of residents due to economic pressures**, which adds to disproportionate housing needs. As the cost of housing rises it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment.

Low-income residents, particularly those who are in segregated R/ECAPs, face economic pressure that prevents them from accessing affordable housing.

Land use and zoning laws can prevent housing needs from being met. Legislation puts additional costs on construction and rehabilitation which are passed on to the consumer. Affordable housing can become impossible to produce when laws are too restrictive, a fact that all communities must remain aware of.

Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

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

In Lubbock there are two racial/ethnic groups that are more likely to be residing in publicly supported housing. The Black, non-Hispanic population makes up 7.2 percent of total households in the city but makes up between 21.5 percent and 42.6 percent of the residents in different publicly supported housing programs. Approximately 26 percent of the total population identify as Hispanic but between 32 percent and 50 percent of residents in publicly supported housing identify as Hispanic. The Black, non-Hispanic population is more likely to receive support via the HCV Program than other programs and the Hispanic population more likely uses the Other Multifamily programs. White, non-Hispanic residents receive Project-Based Section 8 support more than any other program.

Lubbock, TX (Jurisdiction)	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	54	15.88%	131	38.53%	153	45.00%	2	0.59%
Project-Based Section 8	271	37.59%	155	21.50%	292	40.50%	2	0.28%
Other Multifamily	16	25.40%	14	22.22%	31	49.21%	1	1.59%
HCV Program	218	24.06%	386	42.60%	295	32.56%	1	0.11%
Total Households	55,590	62.92%	6,365	7.20%	23,290	26.36%	1,885	2.13%
0-30% of AMI	7,155	55.08%	1,535	11.82%	3,830	29.48%	309	2.38%
0-50% of AMI	11,080	47.15%	2,560	10.89%	7,740	32.94%	482	2.05%
0-80% of AMI	19,390	49.84%	3,875	9.96%	13,035	33.50%	656	1.69%

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, 2009-2013 CHAS (HUD AFFHT0004, Table 6 - Publicly Supported Households by Race/Ethnicity)
Data Note: Numbers presented are numbers of households not individuals.

At the regional level the demographics are the same. Except for the HCV program, there are no additional publicly supported housing recipients outside of the City of Lubbock.

Table: Publicly Supported Housing Residents by Race/Ethnicity (Region)								
	Race/Ethnicity							
Lubbock, TX (Region)	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	54	15.88%	131	38.53%	153	45.00%	2	0.59%
Project-Based Section 8	271	37.59%	155	21.50%	292	40.50%	2	0.28%
Other Multifamily	16	25.40%	14	22.22%	31	49.21%	1	1.59%
HCV Program	283	27.13%	406	38.93%	347	33.27%	1	0.10%
Total Households	70,269	64.10%	6,854	6.25%	29,080	26.53%	1,950	1.78%
0-30% of AMI	8,165	53.64%	1,708	11.22%	4,792	31.48%	309	2.03%
0-50% of AMI	12,945	46.20%	2,792	9.97%	9,617	34.32%	482	1.72%
0-80% of AMI	23,429	49.76%	4,215	8.95%	16,252	34.51%	676	1.44%
Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, 2009-2013 CHAS (HUD AFFHT0004, Table 6 - Publicly Supported Households by Race/Ethnicity)								
Data Note: Numbers presented are numbers of households not individuals.								

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

Except for the HCV program, there is no additional publicly supported housing in the region.

Public Housing: Public housing is only available in non-R/ECAP tracts.

Project-based Section 8: Residents receiving support with this program in R/ECAP tracts are significantly less likely to be Black, non-Hispanic or be families with Children than residents outside of R/ECAP tracts. For residents living outside R/ECAP tracts it is much less likely that they are Elderly or Hispanic than R/ECAP tracts.

Other HUD Multifamily: Other HUD Multifamily programs are not available in non-R/ECAP tracts.

HCV Program: The vast majority of HCV program recipients live outside R/ECAP tracts. Those that live in R/ECAP tracts are more likely to be Hispanic than those outside of R/ECAP tracts. Residents outside of R/ECAP tracts using this program are significantly more likely to be Black, non-Hispanic, be a family with children, or be elderly.

Table: R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

Lubbock, TX (Jurisdiction)	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	347	15.88%	38.53%	45.00%	0.59%	64.45%	23.70%	13.29%
Project-based Section 8								
R/ECAP tracts	334	38.10%	11.90%	49.11%	0.60%	37.79%	45.93%	13.08%
Non R/ECAP tracts	398	37.14%	29.87%	32.99%	0.00%	67.43%	17.30%	10.18%
Other HUD Multifamily								
R/ECAP tracts	64	25.40%	22.22%	49.21%	1.59%	N/a	100.00%	4.62%
Non R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	0.00%	N/a
HCV Program								
R/ECAP tracts	71	25.00%	22.22%	51.39%	0.00%	38.96%	19.48%	25.97%
Non R/ECAP tracts	808	24.32%	44.42%	30.52%	0.12%	48.14%	24.59%	25.17%

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, Decennial Census. (HUD AFFHT0004, Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category)

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

Black, non-Hispanic Households

Publicly Supported Housing and Income Eligibility: Black, non-Hispanic Households - Jurisdiction

Black households make up 38.53 percent of public housing, 21.5 percent of Project-Based Section 8, 22.22 percent of Other Multifamily, and 42.6 percent of the HCV Program. Overall, Black, non-Hispanic households make up 33.9 percent of all publicly supported housing programs. This is much higher than the percentage of this population in the extremely low-, low-, and moderate-income categories in the City. Black households make up 11.82 percent of extremely low-income households, 10.89 percent of all low-income households, and 9.96 percent of moderate-income households.

Publicly Supported Housing and Income Eligibility: Black, non-Hispanic Households - Region

Black households make up 38.53 percent of public housing, 21.5 percent of Project-Based Section 8, 22.22 percent of Other Multifamily, and 38.93 percent of the HCV Program. Overall, Black, non-Hispanic households make up 32.7 percent of all publicly supported housing programs. This is much higher than the percentage of this population in the extremely low-, low-, and moderate-income categories in the Region. Black households make up 11.22 percent of extremely low-income households, 9.97 percent of all low-income households, and 8.95 percent of moderate-income households.

Hispanic Households

Publicly Supported Housing and Income Eligibility: Hispanic Households – Jurisdiction

Hispanic households make up 45 percent of public housing, 40.5 percent of Project-Based Section 8, 49.21 percent of Other Multifamily, and 32.56 percent of the HCV Program. Overall, Hispanic households make up 38.1 percent of all publicly supported housing programs. This is slightly lower than the percentage of this population in the extremely low-, low-, and moderate-income categories in the City. Hispanic households make up 29.48 percent of extremely low-income households, 32.94 percent of low-income households, and 33.5 percent of moderate-income households.

Publicly Supported Housing and Income Eligibility: Hispanic Households – Region

Hispanic households make up 45 percent of public housing, 40.5 percent of Project-Based Section 8, 49.21 percent of Other Multifamily, and 33.27 percent of the HCV Program. Overall, Hispanic households make up 38.1 percent of all publicly supported housing programs. This is slightly lower than the percentage of this population in the extremely low-, low-, and moderate-income categories in the Region. Hispanic households make up 31.48 percent of extremely low-income households, 34.32 percent of low-income households, and 34.51 percent of moderate-income households.

Asian Households

Publicly Supported Housing and Income Eligibility: Asian Households – Jurisdiction

Asian households make up 0.59 percent of public housing, 0.28 percent of Project-Based Section 8, 1.59 percent of Other Multifamily, and 0.11 percent of the HCV Program. Overall, Asian households make up 0.3 percent of all publicly supported housing programs. This is lower than the percentage of this population in the extremely low-, low-, and moderate-income categories in the City. Asian households make up 2.38 percent of extremely low-income households, 2.05 percent of low-income households, and 1.69 percent of moderate-income households.

Publicly Supported Housing and Income Eligibility: Asian Households – Region

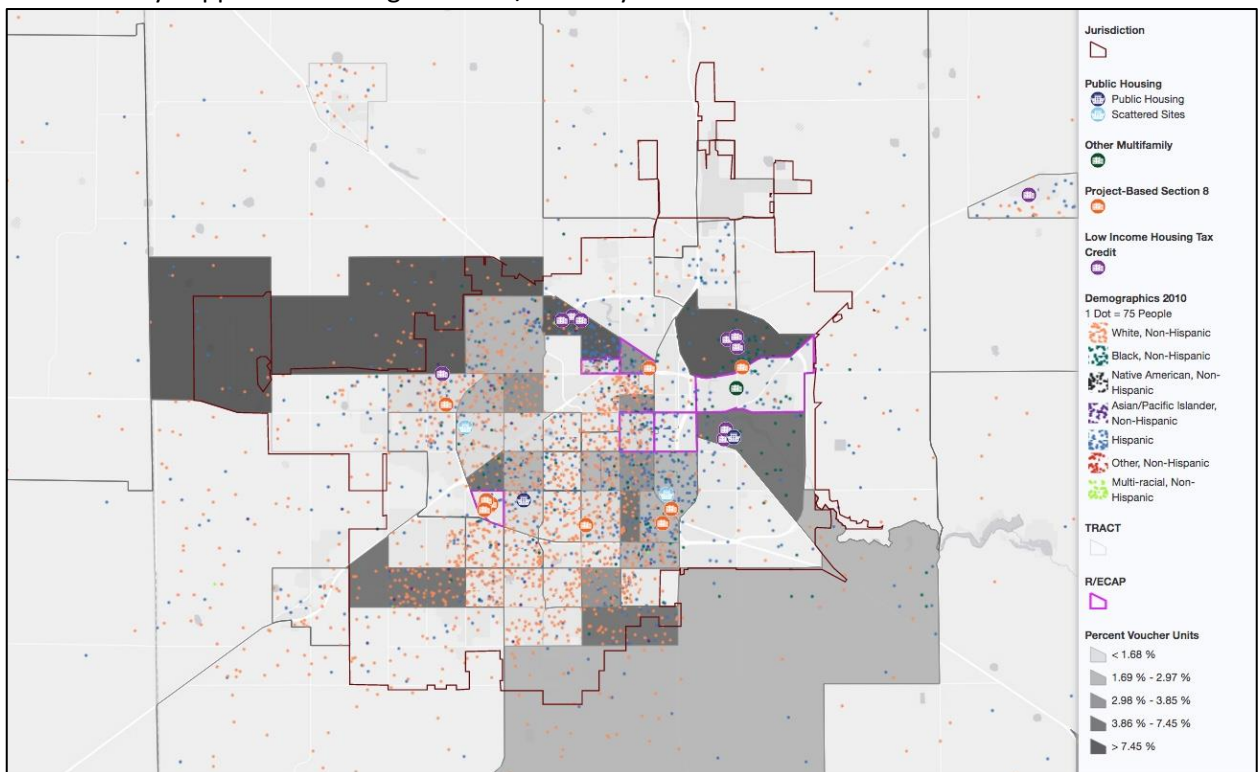
Asian households make up 0.59 percent of public housing, 0.28 percent of Project-Based Section 8, 1.59 percent of Other Multifamily, and 0.10 percent of the HCV Program. Overall, Asian households make up 0.3 percent of all publicly supported housing programs. This is lower than the percentage of this population in the extremely low-, low-, and moderate-income categories in the Region. Asian households make up 2.03 percent of extremely low-income households, 1.72 percent of low-income households, and 1.44 percent of moderate-income households.

b. Publicly Supported Housing Location and Occupancy

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

The following HUD provided map displays the geographic location of publicly supported housing in Lubbock as it relates to race and ethnicity. Publicly supported housing is clustered in a few census tracts on the outer ring around the downtown area. Of the nine LIHTC locations eight of them are in three census tracts. They are all in census tracts that border a R/ECAP.

MAP: Publicly Supported Housing and Race/Ethnicity



Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, Decennial Census. (HUD AFFHT0004)

Race/Ethnic Site Details

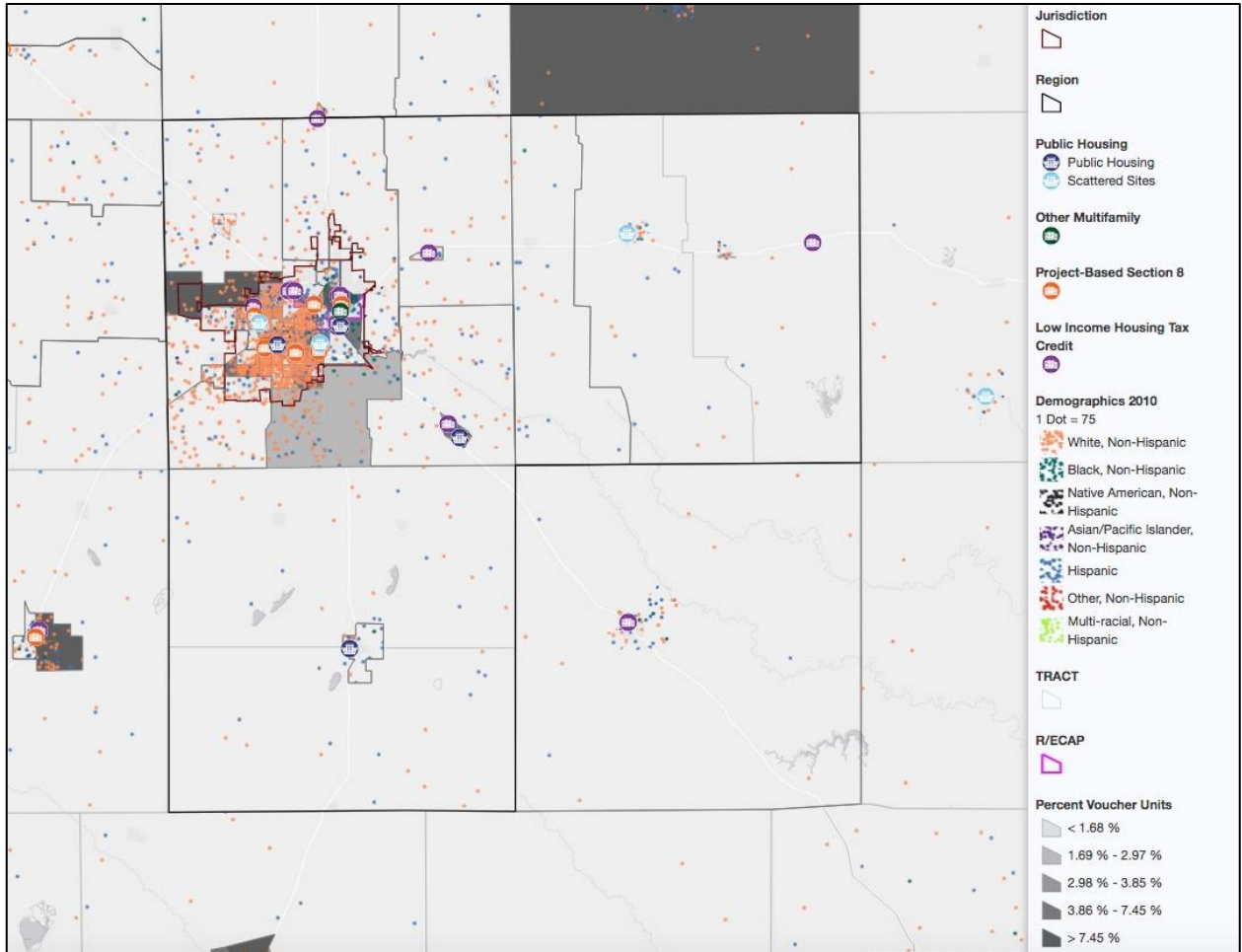
The racial and ethnic demographics of census tracts with publicly supported housing varies considerably. For example, out of the public housing developments one is in a majority Black tract, two are in majority White tracts, and one is in a majority Hispanic tract. The situation is similar for Project-Based Section 8. There is only one HUD Multifamily development and it is in a census tract that is primarily minority with 44.07 percent Black and 46.63 percent Hispanic. The following table details the demographics for Lubbock's publicly supported housing developments.

Table: Race/Ethnic Site Details for Publicly Supported Housing				
Name	Census tract	Percent Black in tract	Percent Hispanic in tract	Percent White in tract
Public Housing Developments				
Behner Place / Mary Myers	48303001803	4.85	28.64	61.32
Park Meadows	48303001200	57.18	34.97	4.65
96 West	48303001702	7.22	24.69	64.98
Cherry Point / 36 South	48303002400	11.39	74.73	12.41
Project-Based Section 8				
High Plains-Lubbock	48303000404	4.93	25.91	61.65
South Plains Apts	48303001708	5.69	33.96	55.53
Silver Village	48303001708	5.69	33.96	55.53
Homestead Apartments	48303001708	5.69	33.96	55.53
Parkview Place	48303002101	4.36	26.05	66.61
Casa Orlando	48303000202	4.97	83.04	11.19
Garden Apartments	48303002204	13.64	53.56	31.21
Cricket Court	48303002400	11.39	74.73	12.41
Cornerstone Homes	48303000900	60.13	32.89	5.59
Other HUD Multifamily				
Courtyard At King's Dominion	48303001000	44.07	46.63	7.97
Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, Decennial Census. (HUD AFFHT0004, HUD MAP 5 – Publicly Supported Housing and Race/Ethnicity)				

Region

At the regional level there is not a significant relationship between the location of public housing and race or ethnicity. There are only six publicly supported housing sites outside of the City of Lubbock, four LIHTC and two public housing units.

MAP: Publicly Supported Housing and Race/Ethnicity (Region)



Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, Decennial Census. (HUD AFFHT0004)

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

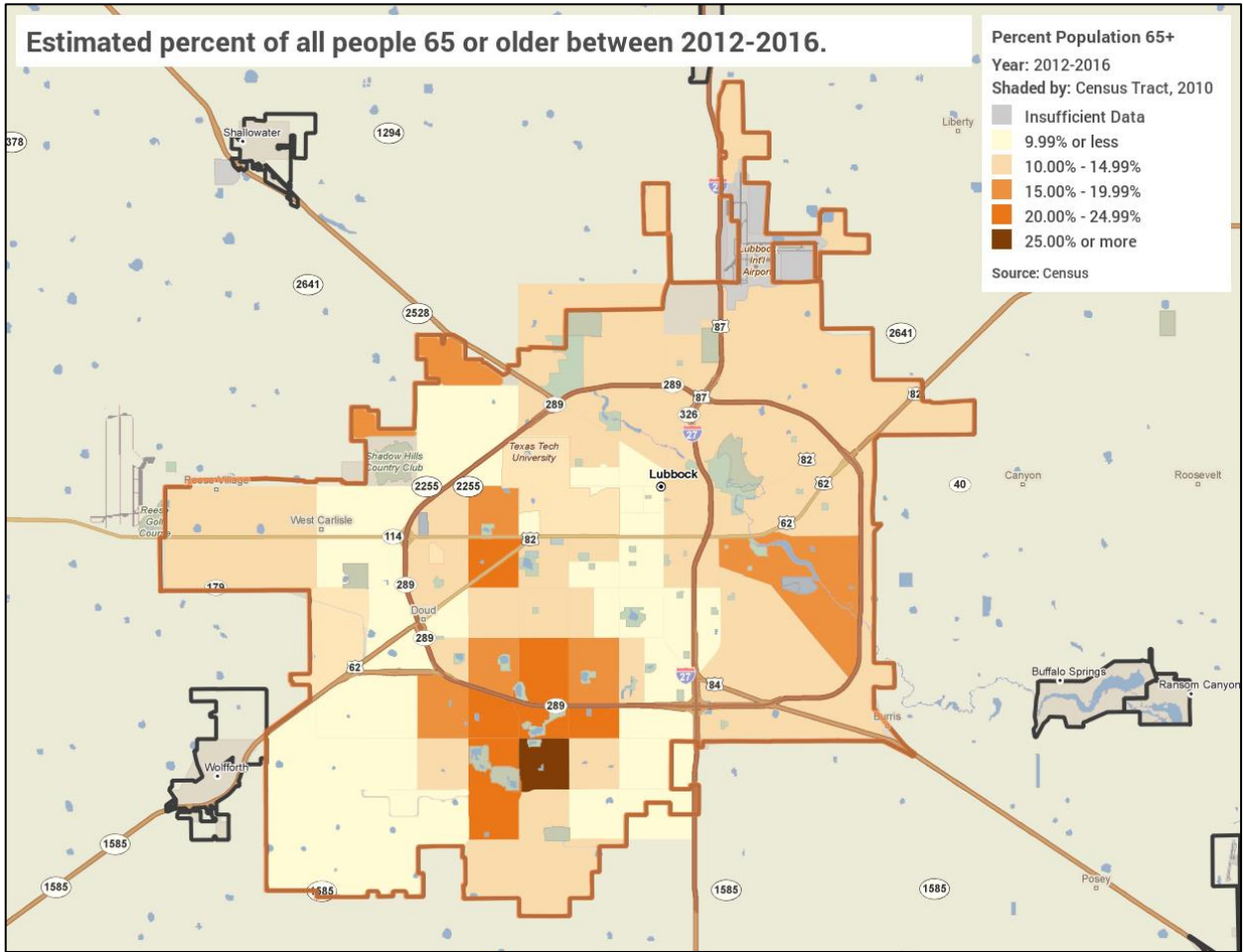
Elderly

Elderly, defined as 65 years or older, make up 10.74 percent of the population of the City and 11.21 percent of the region. However, within the City they are not evenly distributed. Elderly residents are more heavily concentrated in the southern neighborhoods in the city, including one census tract that is over 25 percent elderly. This area is primarily White, non-Hispanic and does not have any R/ECAPs.

Nearly 24 percent of all public housing units are filled by elderly residents. One-hundred percent of all residents in Other HUD Multifamily are elderly. In R/ECAP tracts, the elderly makes up 45.93 percent of project-based Section 8 and 19.48 percent of HCV Program. In non-R/ECAP tracts, elderly residents make up 17.30 percent of project-based Section 8 and 24.59 percent of the HCV program.

Table: Elderly				
Age	(Lubbock, TX CDBG, HOME, ESG) Jurisdiction		(Lubbock, TX) Region	
	#	%	#	%
Under 18	54,260	23.64%	71,254	24.50%
18-64	150,617	65.62%	186,938	64.28%
65+	24,652	10.74%	32,613	11.21%
Source: Decennial Census, 2010 (HUD AFFHT0004, Table 1 – Demographics)				

MAP: Population 65 Years and Older



Source: 2012-2016 ACS via PolicyMap

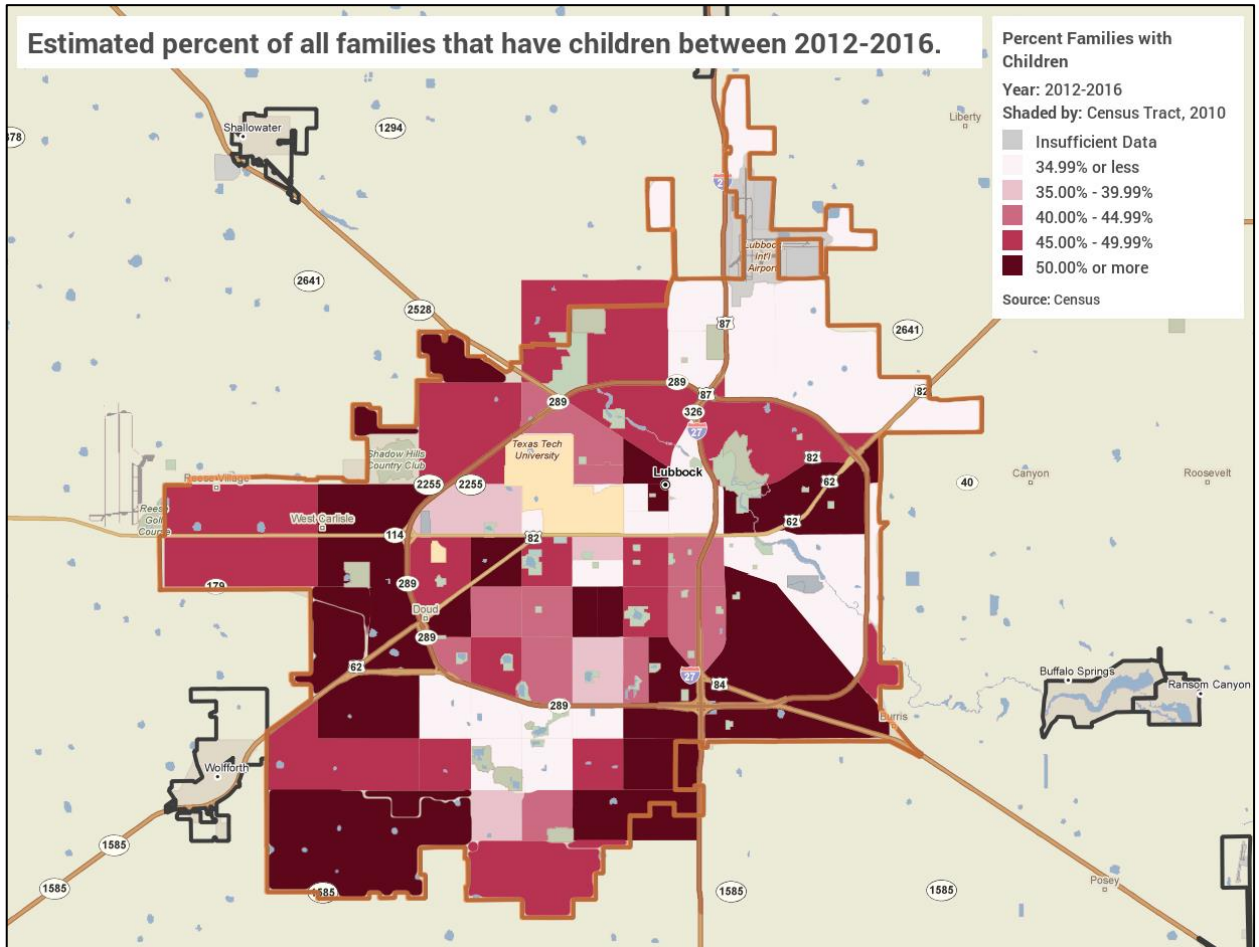
Families with Children

According to HUD, there are 24,229 families with children in Lubbock (45.62 percent) and 31,459 in the region (45.34 percent). These households are distributed throughout the City without any significant areas of concentration. Nearly 65 percent of all public housing units are filled by families with children. There are no families with children in Other HUD Multifamily units. In R/ECAP tracts, families with children make up 37.79 percent of project-based Section 8 and 38.96 percent of HCV Program. In non-R/ECAP tracts, families with children make up 67.43 percent of project-based Section 8 and 48.14 percent of the HCV program.

Table: Families with Children				
	(Lubbock, TX CDBG, HOME, ESG) Jurisdiction		(Lubbock, TX) Region	
	#	%	#	%
Families with Children	24,229	45.62%	31,459	45.34%

Source: Decennial Census, 2010 (HUD AFFHT0004, Table 1 – Demographics)

MAP: Families with Children



Source: 2012-2016 ACS via PolicyMap

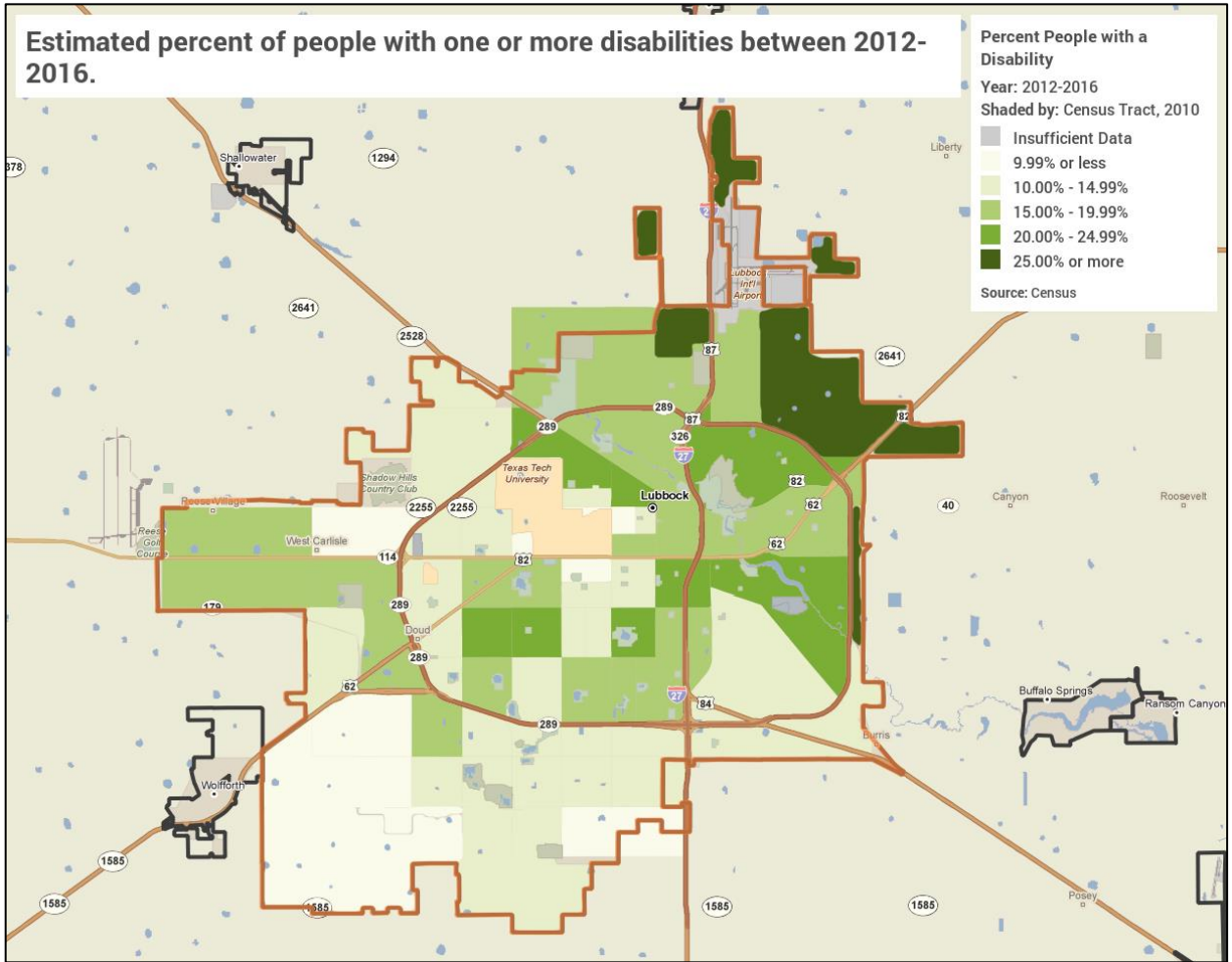
Disability

Disabled residents make up 14.92 percent of the City and 15.05 percent of the Region; however, they are not distributed evenly across the City of Lubbock. Disabled residents are more heavily concentrated in the northeastern neighborhoods in the city, including one census tract that is over 25 percent disabled.

Nearly 14 percent of all public housing units have a disabled resident and nearly 5 percent of all residents in Other HUD Multifamily are disabled. In R/ECAP tracts, disabled residents make up 13.08 percent of project-based Section 8 and 25.97 percent of HCV Program. In non-R/ECAP tracts, disabled residents make up 10.18 percent of project-based Section 8 and 25.17 percent of the HCV program.

Table: Disability				
	(Lubbock, TX CDBG, HOME, ESG) Jurisdiction		(Lubbock, TX) Region	
	#	%	#	%
Persons with disability age 5 years and older	31,808	14.92%	40,552	15.05%
Source: 2009-2013 ACS (HUD AFFHT0004, Table 14 - Disability by Age Group)				

MAP: Disability



Source: 2012-2016 ACS via PolicyMap

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

Elderly

Nearly 24 percent of all public housing units are filled by elderly residents. One-hundred percent of all residents in Other HUD Multifamily are elderly. In R/ECAP tracts, the elderly makes up 45.93 percent of project-based Section 8 and 19.48 percent of HCV Program. In non-R/ECAP tracts, elderly residents make up 17.30 percent of project-based Section 8 and 24.59 percent of the HCV program.

Families with Children

In R/ECAP tracts, families with children make up 37.79 percent of project-based Section 8 and 38.96 percent of HCV Program. In non-R/ECAP tracts, families with children make up 67.43 percent of project-based Section 8 and 48.14 percent of the HCV program.

Disability

Nearly 14 percent of all public housing units have a disabled resident and nearly 5 percent of all residents in Other HUD Multifamily are disabled. In R/ECAP tracts, disabled residents make up 13.08 percent of project-based Section 8 and 25.97 percent of HCV Program. In non-R/ECAP tracts, disabled residents make up 10.18 percent of project-based Section 8 and 25.17 percent of the HCV program.

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

The Rental Assistance Demonstration was created to give public housing authorities the ability to preserve and improve public housing properties and address maintenance issues. The Low-Income Tax Credit (LIHTC) is a resource for creating affordable housing in the City. These programs have some basic requirements involving fair housing, protecting certain classes of people, and low- and moderate-income households.

Public Housing

Currently, the public housing developments are racially and ethnically diverse but do not reflect the demographics of Lubbock as a whole. Lubbock is a majority White city, but public housing developments are 20 percent or less White. There is a disproportionately large Black population in public housing when compared to the City, particularly in Park Meadows where 73 percent of the population is Black. Additionally, approximately 75 percent of the households have children in 3 out of 4 public housing developments.

Project-Based Section 8

Section 8 housing is also racially and ethnically diverse overall, but there are some racial concentrations within certain developments. Two developments have a White population 80 percent or over and three developments have a Hispanic population of approximately 60 percent or higher. Four developments have over 80 percent of their households with children.

Other Multifamily Assisted Housing

There is only one Other Multifamily Assisted Housing development in Lubbock. Courtyard at King’s Dominion is ethnically and racially diverse, nearly half of the population is Hispanic, and approximately one-quarter is White and Black. This development does not have any families with households.

Table: Demographics of Publicly Supported Housing Developments, by Program Category								
Development Name	PHA Code	PHA	# Units	White	Black	Hispanic	Asian	HHs with Children
Public Housing								
(Lubbock, TX CDBG) Jurisdiction								
Cherry Point / 36 South	TX018	LHA	108	12%	43%	44%	N/a	75%
Behner Place / Mary Myers	TX018	LHA	141	20%	26%	53%	2%	49%

96 West	TX018	LHA	95	18%	40%	42%	N/a	76%
Park Meadows	TX018	LHA	32	7%	73%	20%	N/a	73%
Project Based Section 8								
(Lubbock, TX CDBG) Jurisdiction								
High Plains Apartments	TX018	LHA	50	25%	16%	59%	N/a	82%
Homestead Apartments	TX018	LHA	40	80%	2%	17%	N/a	N/a
Parkview Place, Lubbock	TX018	LHA	72	84%	1%	14%	N/a	N/a
Silver Village	TX018	LHA	100	63%	4%	31%	1%	N/a
South Plains Apartments	TX018	LHA	135	22%	14%	63%	1%	63%
Cornerstone Homes Winwood	TX018	LHA	109	49%	35%	16%	N/a	80%
Casa Orlando	TX018	LHA	69	6%	27%	67%	N/a	69%
Castle Gardens / Cricket Ct	TX018	LHA	126	8%	45%	47%	N/a	85%
Garden Apartments	TX018	LHA	62	27%	35%	39%	N/a	82%
Other Multifamily Assisted Housing								
(Lubbock, TX CDBG) Jurisdiction								
Courtyard At Kings Dominion	TX018	LHA	66	26%	23%	48%	2%	N/a
Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, Decennial Census. (HUD AFFHT0004, Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category)								

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

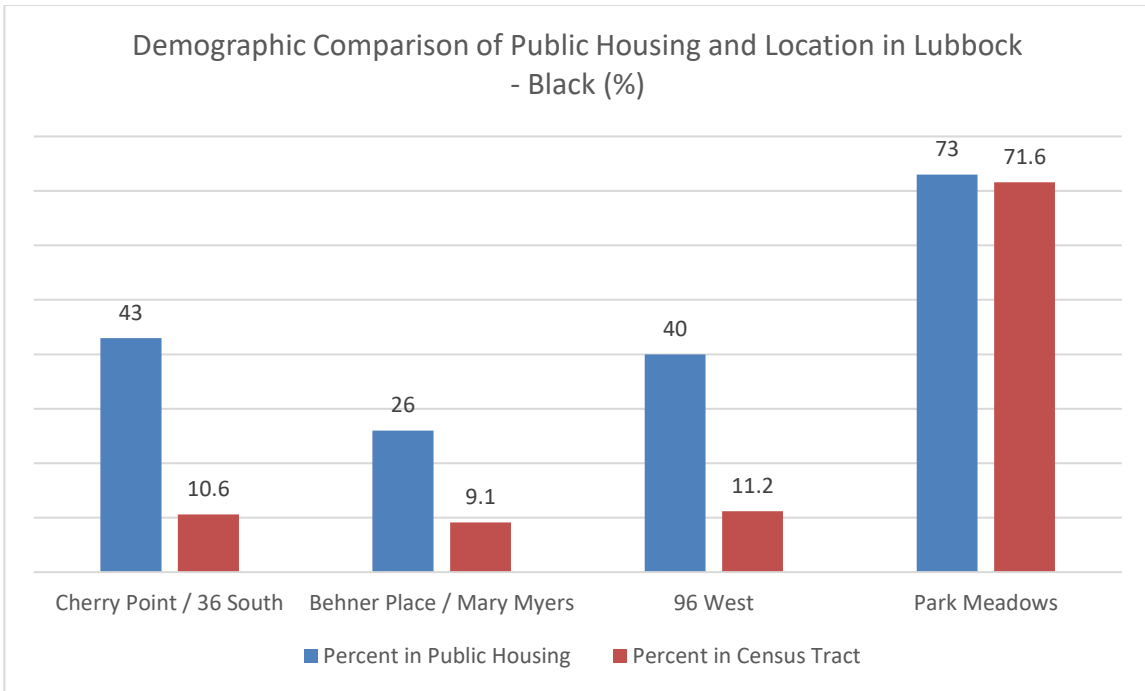
- v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in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

Publicly Supported Housing and Black Population

In Lubbock, there is a relatively large Black population in publicly supported housing. Despite making up only 8 percent of the total population Black residents make up between 23 and 73 percent of publicly supported housing programs.

Public Housing

One public housing development is in a primarily Black Census Tract and has a public housing population that is similar. The remaining three developments are in Census Tracts with a Black population of approximately 10 percent but have a much larger Black population in public housing.

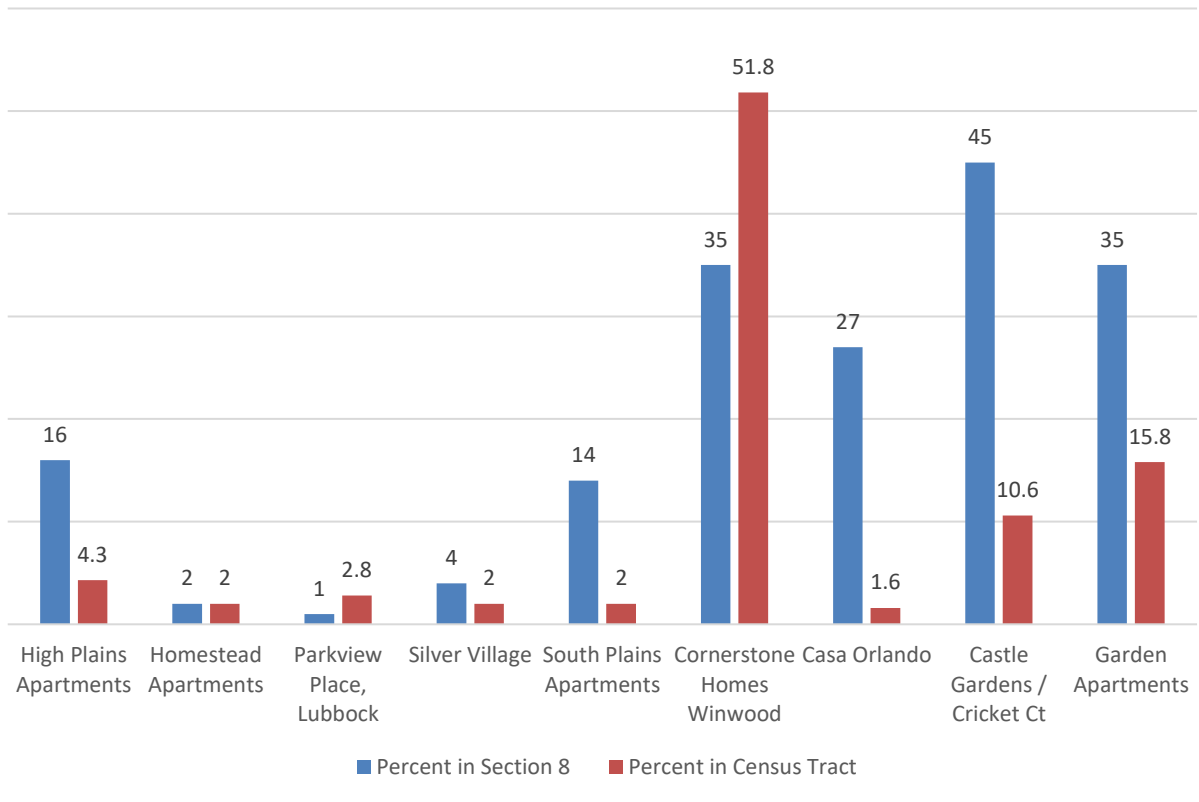


Source: HUD, (HUD AFFHT0004) and 2012-2016 American Community Survey 5-Year Estimates

Project Based Section 8

Out of the nine Project Based Section 8 Developments in Lubbock, five have a significantly larger Black population than the Census Tract they are in. One development (Cornerstone Homes Winwood) is in a majority Black Census Tract but has approximately 1/3 of the development population that is Black.

Demographic Comparison of Section 8 Housing and Location in Lubbock - Black (%)



Source: HUD, (HUD AFFHT0004) and 2012-2016 American Community Survey 5-Year Estimates

Other Multifamily

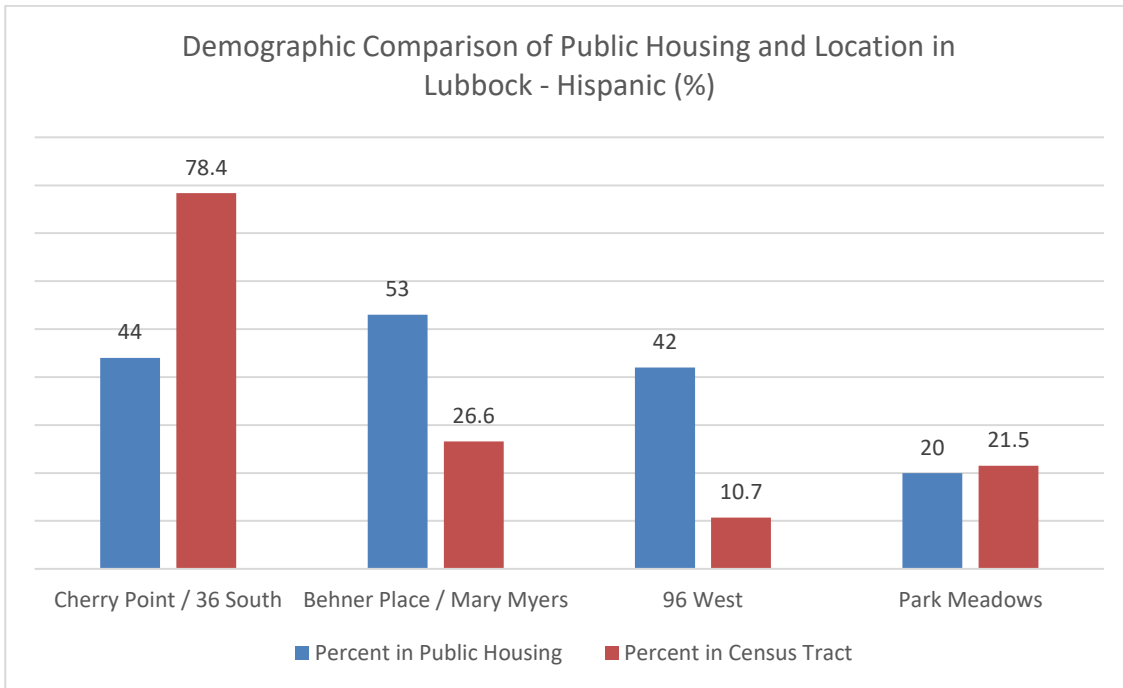
There is only one Multifamily development in Lubbock. The Census Tract it is in is 45.5 percent Black and the development is 23 percent Black.

Publicly Supported Housing and Hispanic Population

In Lubbock, there is a relatively large Hispanic population in publicly supported housing. Hispanic residents make up 32.23 percent of the total population and Hispanic residents make up between 14 and 67 percent of publicly supported housing programs.

Public Housing

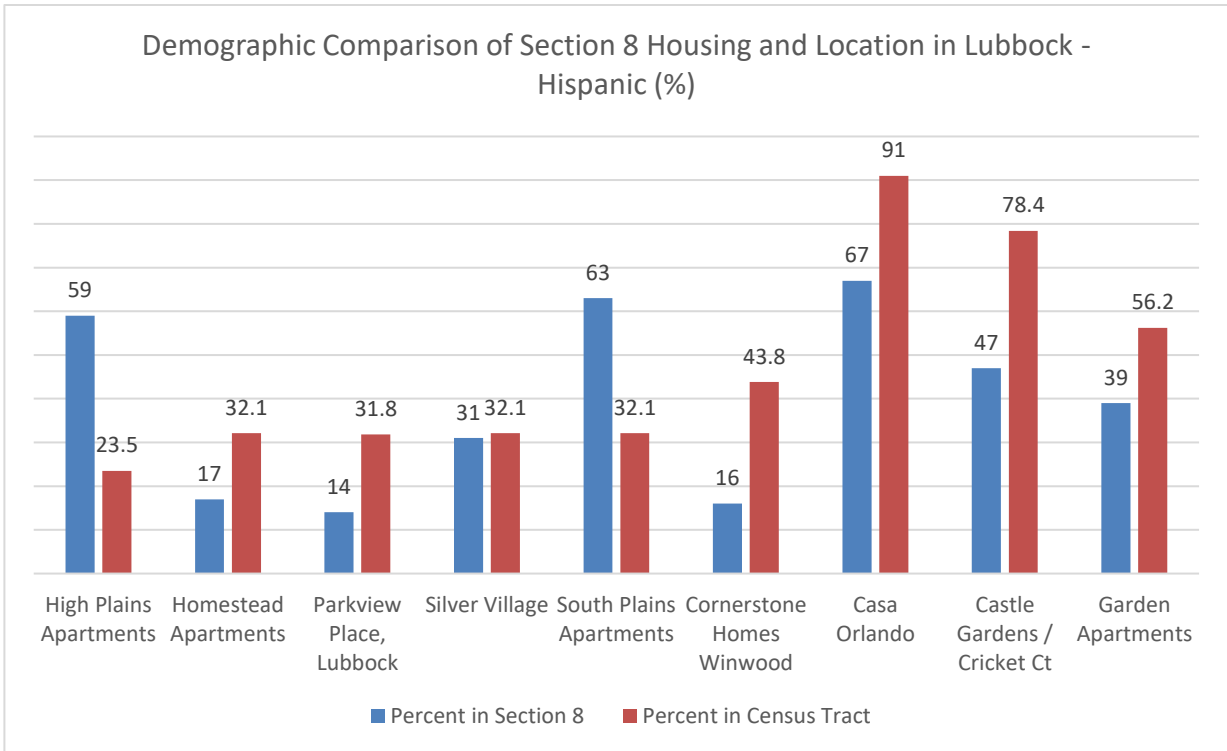
One public housing development is in a primarily Hispanic Census Tract but has a Hispanic public housing population over 30 percent lower. The remaining three developments are in Census Tracts with a Hispanic population of between approximately 10 and 25 percent, two have significantly larger Hispanic populations in public housing and one has a similar population.



Source: HUD, (HUD AFFHT0004) and 2012-2016 American Community Survey 5-Year Estimates

Project Based Section 8

Out of the nine Project Based Section 8 Developments in Lubbock, two have a significantly larger Hispanic population than the Census Tract they are in. Three developments are in a majority Hispanic Census Tract with lower rates of Hispanic residents in the developments.



Source: HUD, (HUD AFFHT0004) and 2012-2016 American Community Survey 5-Year Estimates

Other Multifamily

There is only one Multifamily development in Lubbock. The Census Tract it is in is 42.2 percent Hispanic and the development are 48 percent Hispanic.

Publicly Supported Housing and Asian Population

In Lubbock, there is a small Asian population in publicly supported housing. Asian residents make up 2.37 percent of the total population and make up between 1 and 2 percent of publicly supported housing programs.

Public Housing

One public housing development has an Asian population present, Behner Place/Mary Myers. The development is 2 percent Asian and 0.3 percent of the census tract.

Project Based Section 8

Out of the nine Project Based Section 8 Developments in Lubbock, two have Asian residents who represent 1 percent of the population. Both are in the same Census Tract which is 7.4 percent Asian.

Other Multifamily

There is only one Multifamily development in Lubbock and 2 percent of the population of that development identifies as Asian. The Census Tract is 0 percent Asian.

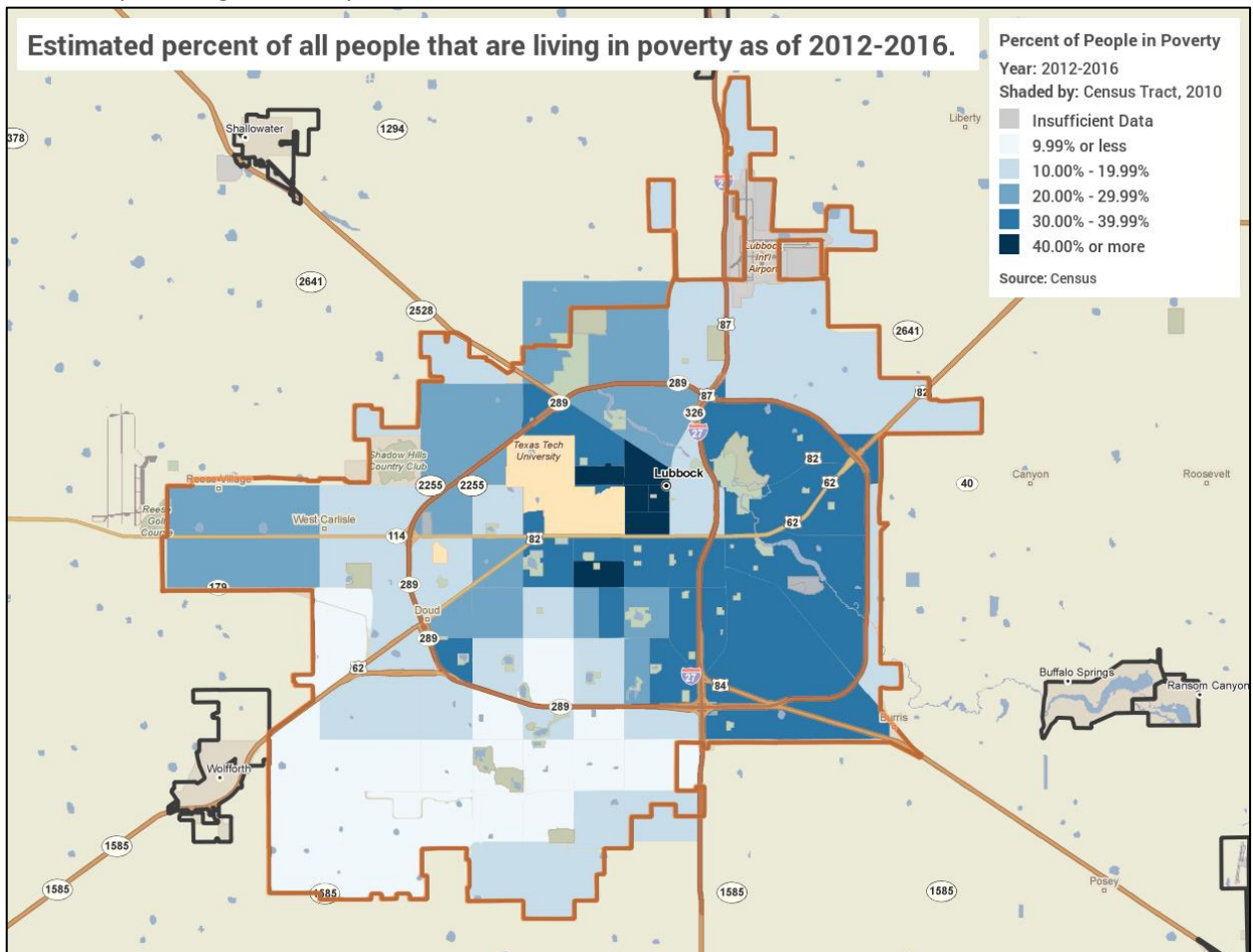
c. Disparities in Access to Opportunity

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

Access to Low Poverty Neighborhoods

Based on the HUD AFH Maps, areas with higher concentrations of publicly supported housing mostly fall within the areas that have low Access to Low Poverty Neighborhoods. This means that publicly supported housing tends to be in higher poverty areas while wealthier areas lack publicly supported housing. Poverty appears to be concentrated in the central areas of Lubbock, particularly to the east of Texas Tech University. Many of these tracts have 40 percent or more of the population in poverty.

MAP: People Living in Poverty

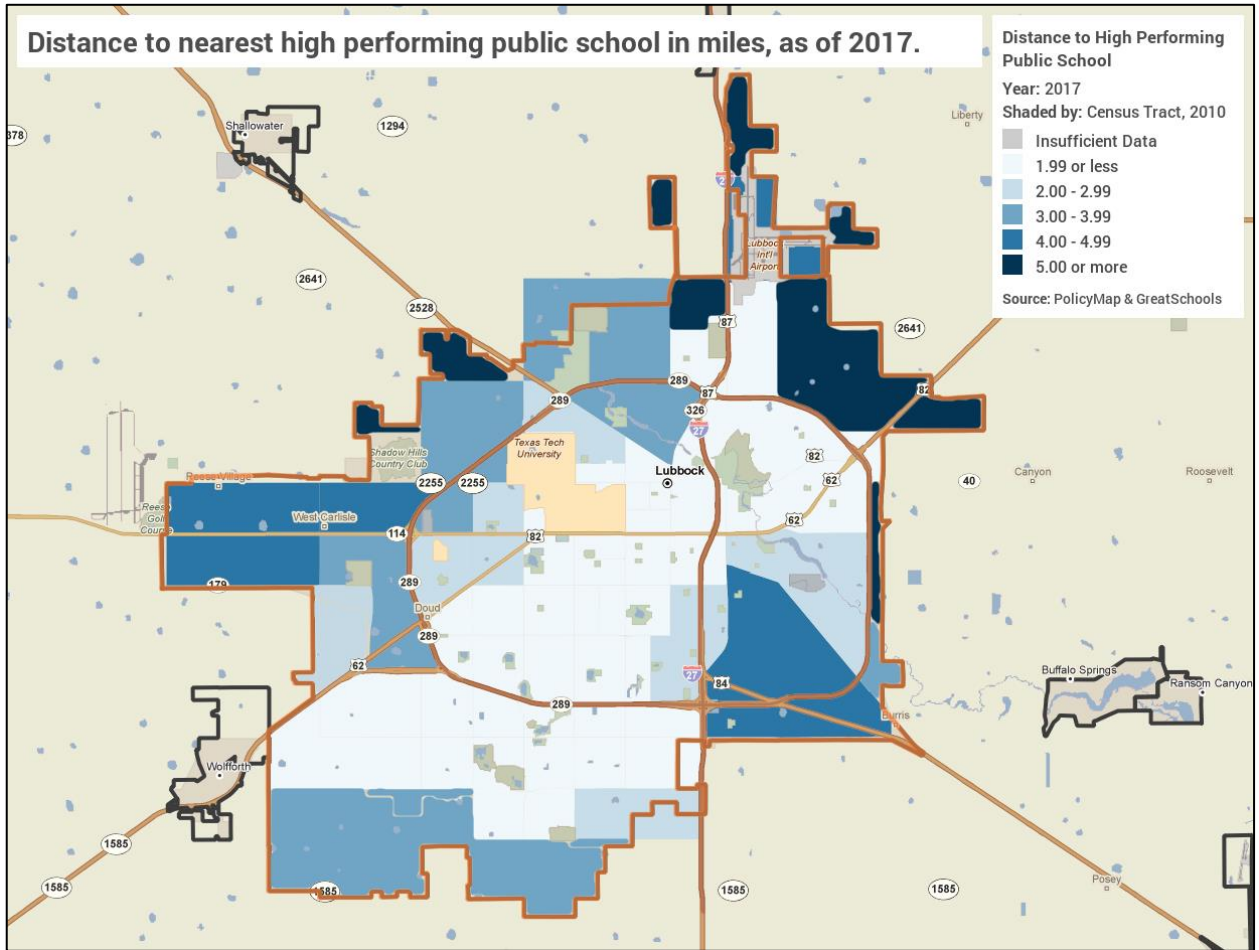


Source: 2012-2016 ACS via PolicyMap

Access to High Performing Schools

Overall, residents who live in tracts to the far northern and northwest tracts have greater distance to travel to high performing schools. These are also tracts that are closest to most of the publicly supported housing developments.

MAP: Distance to Nearest High Performing School



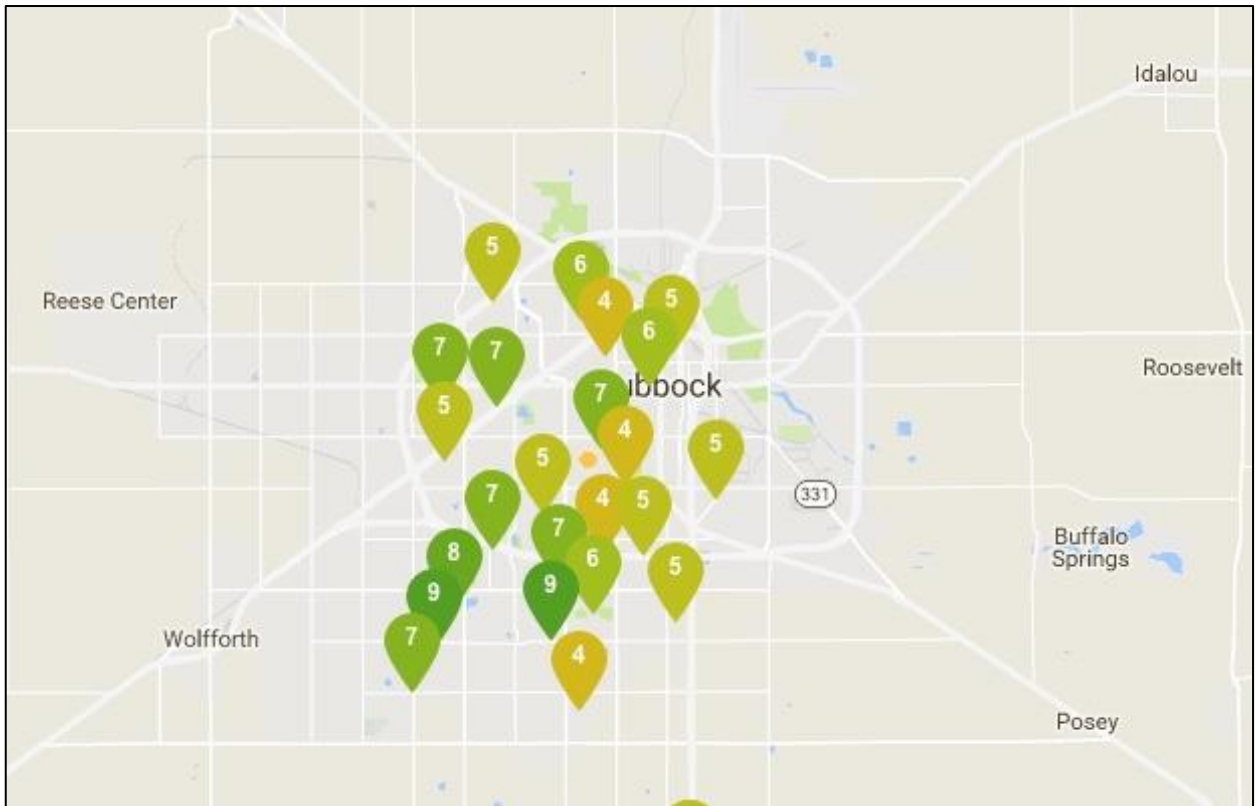
Source: 2017 GreatSchools via PolicyMap

GreatSchools Ratings

The following maps show the location of average/above average and low performing public schools and their location in the City. Green markers indicate schools with a higher performance rating of 8 or better, light green/orange markers are average performing schools of 4-7, and red markers are the lowest performing schools with a rating of 3 or lower. Schools are categorized into elementary, middle and high schools. Only public schools are displayed in the following maps.

Public Elementary Schools

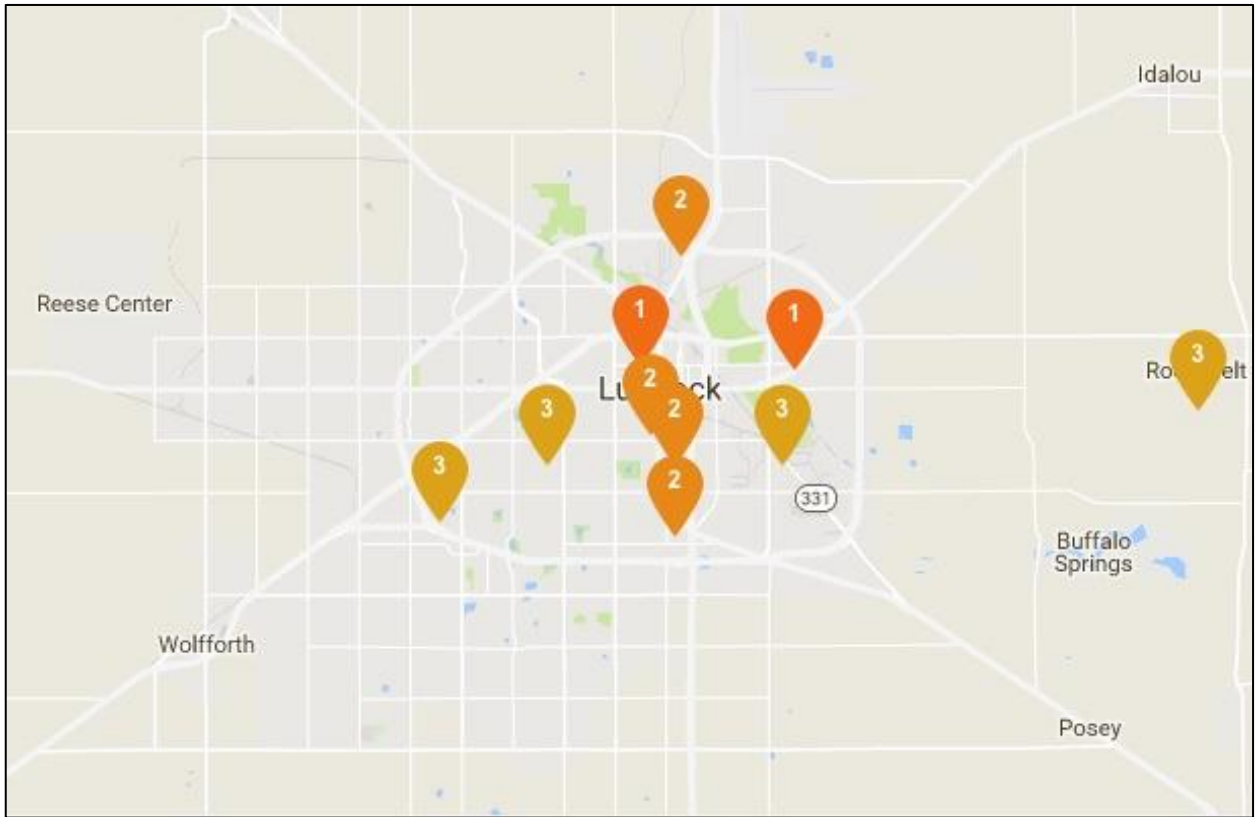
MAP: Average/Above Average Performing Elementary Schools



Source: GreatSchools, 2017

According to GreatSchools, there are several high performing schools in Lubbock, but they are primarily in the southwest portion of the city. Schools in the other areas of the city tend to be average.

MAP: Low Performing Elementary Schools

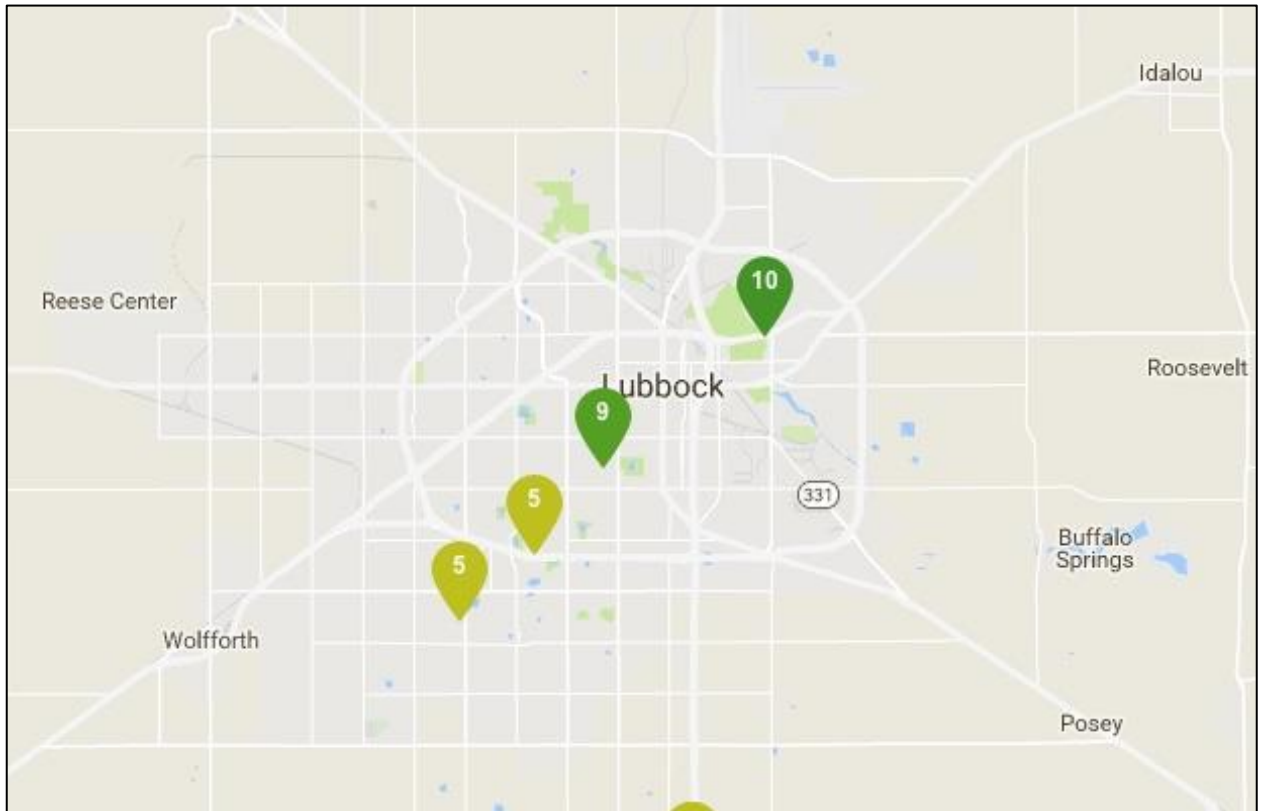


Source: GreatSchools, 2017

Lubbock's low performing schools are primarily in the central and eastern parts of the City. This is also the area where most of the publicly supported housing developments are.

Public Middle Schools

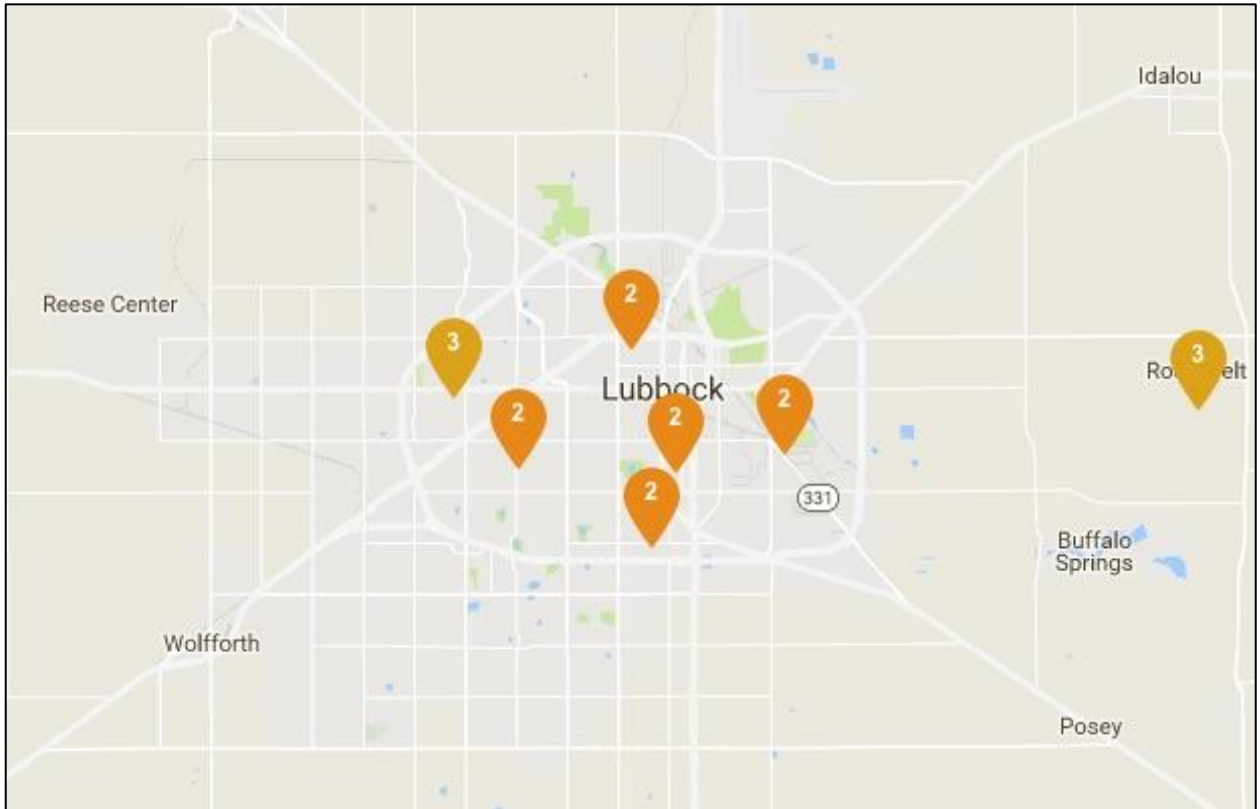
MAP: Average/Above Average Performing Middle Schools



Source: GreatSchools, 2017

The highest performing Middle School in the City is in the northeast section of the City. Another strong performing school is in the central part of the City while two average performing Middle Schools are in the southwestern part of the City.

MAP: Low Performing Middle Schools

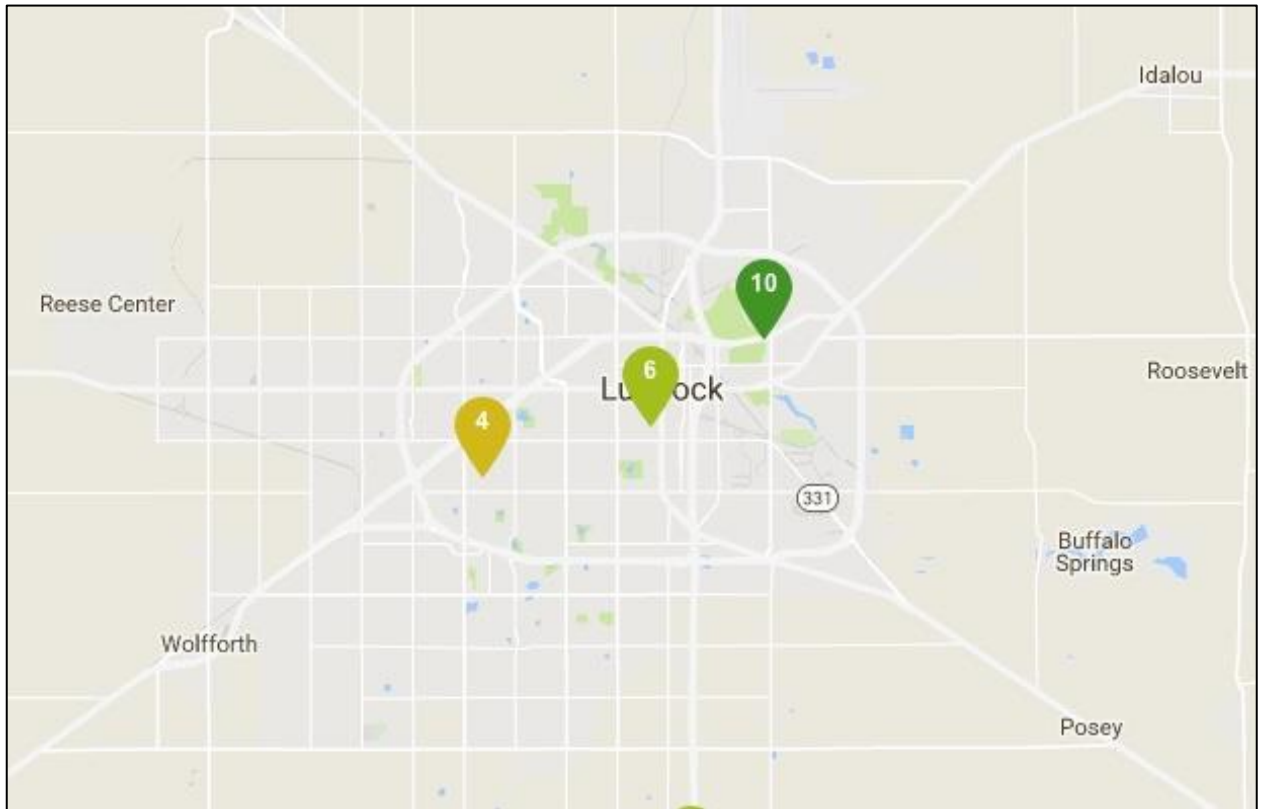


Source: GreatSchools, 2017

The lowest performing Middle Schools in Lubbock are all in the center part of the City.

Public High Schools

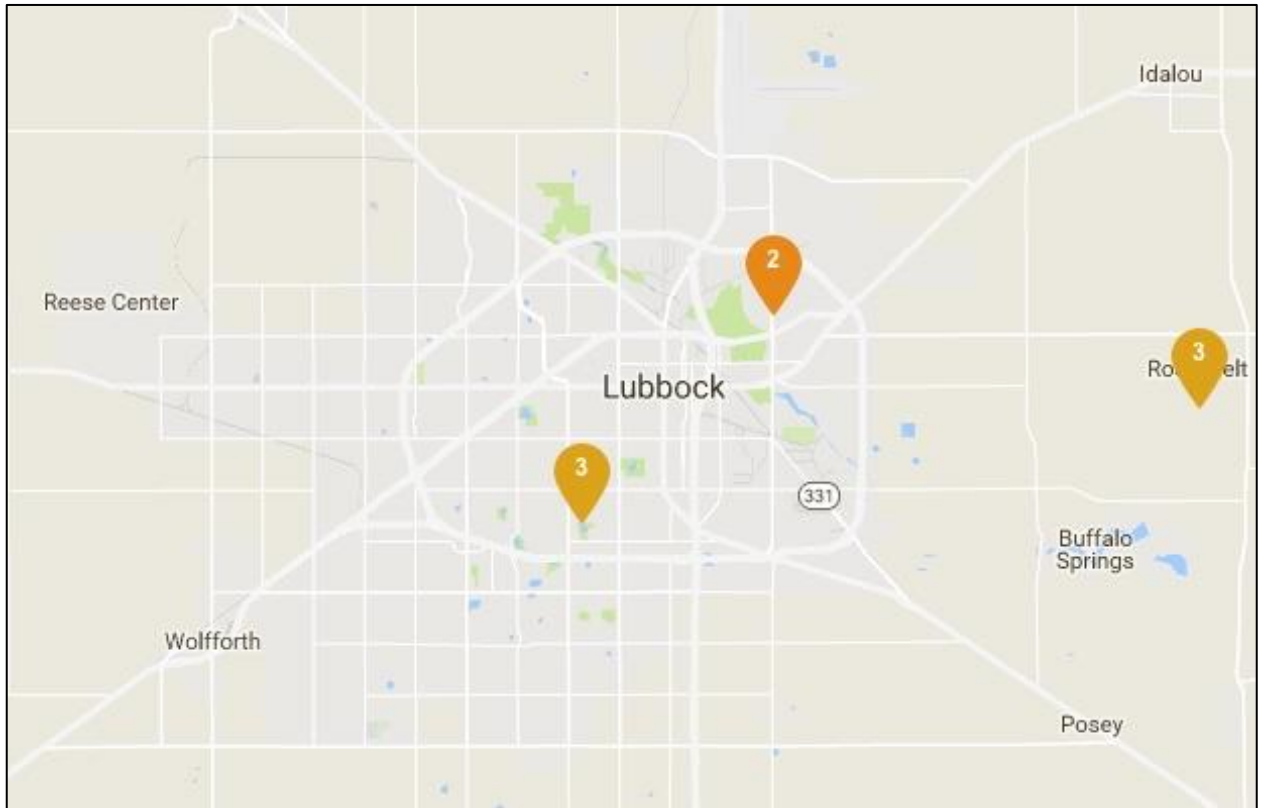
MAP: Average/Above Average Performing High Schools



Source: GreatSchools, 2017

The highest performing High School is in the northeastern part of the city and average schools are in the central and western part of Lubbock.

MAP: School Low Performing High Schools



Source: GreatSchools, 2017

The lowest performing high schools in Lubbock are on opposite ends of the City. One is in the northeast and one is in the central southwest area.

2. Additional Information

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

There are three groups that are not protected classes according to federal, state, or local legislation but are relevant to publicly supported housing. The LGBT (lesbian, gay, bisexual, or transgender) community, persons with criminal backgrounds, and persons with HIV/AIDS and their families may face discrimination or disparities in access to opportunities.

Housing Discrimination against Same-Sex Couples & LGBT Individuals

The Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, disability, and familial status; however, it does not specifically include sexual orientation and gender identity. HUD states, "Discrimination against a lesbian, gay, bisexual or transgender (LBT) person may be covered by the Fair Housing Act if it is based on non-conformity with gender stereotypes. For example, if a housing provider refuses to rent to an LGBT person because he believes the person acts in a manner that does not conform to his notion of how a person of a particular sex should act, the person may pursue the matter as a violation of the Fair Housing Act's prohibition of sex."

HUD also requires that housing providers that receive HUD funding be subject to HUD's Equal Access Rule, which requires equal access to HUD Programs. In February 2012, HUD released the "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" rule. Through the final rule, HUD has implemented a policy to ensure all HUD programs, including publicly supported housing, were open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

Compared to most protected groups, data for LGBT persons is difficult to collect for several reasons, including the difficulty of defining an LGBT person and the unwillingness of many people to disclose private information about their sexuality or identity. The Williams Institute UCLA, a leader in research and publishing LGBT resource, identified same-sex couple households as an important measuring indicator. According to the institute, 432 family households were same-sex households in Lubbock in 2010. This puts the group at 4.88 same-sex couples per 1,000 households.

While these numbers do not seem significant, housing discrimination is of great concern for the LGBT community. Polls conducted by the Williams Institute found that 79 percent of Texas residents think that LGBT people experience discrimination. According to the same report, over 30 percent of LGBT individuals are economically vulnerable with incomes less than \$24,000 per year and over 25 percent report not having enough money for food or health care.

Table: Same-Sex Couples (counties with 50+ same-sex couples ranked per 1,000 households)

	Same-Sex Couples (adjusted)	Same-Sex Couples per 1,000 households (adjusted)	Rank
Lubbock, TX (city)	432	4.88	39*
Lubbock County	476	4.50	18*

Source: The Williams Institute, UCLA School of Law, 2010
Data Note: * indicates Lubbock, TX (city) is ranked by cities in TX & Lubbock County is ranked by counties in TX.

Use of Criminal Records by Providers of Housing & Real Estate Transactions

On April 4, 2016, HUD’s Office of General Counsel Guidance issued a guidance on the application of Fair Housing standards in relation to the use of criminal records by providers of housing and for real estate related transactions. The guidance addresses possible discrimination and disparate methods in Fair Housing cases in which a housing provider may refuse to rent or renew a lease based on an individual’s criminal history. According to HUD, nearly one-third of the 100 million U.S. adults have a criminal record of sort, many of whom having been incarcerated. When these individuals are released from prison or jail, their ability to access safe, secure, and affordable housing is critical for their re-entry into the community. Many with criminal records, even those who are convicted but not incarcerated, face significant barriers including discrimination with seeking housing (including publicly supported housing). Black and Hispanic residents are arrested, convicted, and incarcerated at rates disproportionate to their share of the general population.

HUD concludes, “While the Act does not prohibit housing providers from appropriately considering criminal history information when making housing decisions, arbitrary and overbroad criminal history-related bans are likely to lack any legally sufficient justification. Thus, a discriminatory effect resulting from a policy or practice that denies housing to anyone with a prior arrest or any kind of criminal conviction cannot be justified, and therefore such a practice would violate the Fair Housing Act.”

	Murder	Rape	Robbery	Assault	Burglary	Larceny	Auto Theft	Total
Number Offenses	7	198	488	2189	2934	9933	1145	16894
Rate Per 100,000	2.3	65.8	162.1	727.2	974.7	3299.7	380.4	5612.1
Number of Arrests	2	21	77	326	155	1846	238	2665

Source: Texas Department of Public Safety, Crime Report for 2016

Individuals with HIV/AIDS and their Families

According to the Center for AIDS Prevention Studies (CAPS) at the University of California San Francisco, individuals with the HIV virus face stigma which often leads to prejudice and discrimination. Under HUD’s Equal Access Rule, low-income persons with HIV/AIDS and their families may pursue public housing without discrimination and may be allowed reasonable accommodations for housing options. Persons with HIV/AIDS are also protected against discrimination in the sale and rental of housing and residential real estate. Under the Fair Housing

Act and Section 504 of the Rehabilitation Act, persons with HIV/AIDS, who may have been discriminated against, can file a complaint with the local HUD office. HUD-funded public housing and other HUD-funded nonprofit development of low-income housing, or recipients of federal financial assistance would be subject to Section 504's non-discrimination requirements. The following tables display information about residents with HIV/AIDS in the City and County.

Table: HIV and AIDS Diagnosis in 2016		
City	HIV	AIDS
Lubbock, TX	36	17
Source: Texas Dept. of State Health Services, Texas 2016 HIV Surveillance Report		

Table: HIV/AIDS & People Living with HIV (county)						
	HIV Diagnosis		AIDS		People Living with HIV	
By Number of Cases						
	Cases	County Rank	Cases	County Rank	Cases	County Rank
Lubbock County	39	#14	18	#15	475	#19
By Case Rates						
	Rate	County Rank	Rate	County Rank	Rate	County Rank
Lubbock County	12.9	#14	5.9	#14	N/A	N/A
Source: Texas Dept. of State Health Services, Texas 2016 HIV Surveillance Report						

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

Lubbock Housing Authority Programs

Established in 1941, the Housing Authority of Lubbock (LHA) is empowered with the responsibility and authority to maintain Public Housing in the City. The Housing Authority runs three programs: low income public housing, housing choice voucher program, and housing choice voucher family self-sufficiency.

Low Income Public Housing: The Lubbock Housing Authority owns and manages approximately 367 units throughout the City. These units provide decent housing for low-income families, the elderly, and disabled individuals. Tenants pay 30 percent of their income toward their rent and any additional costs are subsidized with federal funding.

Housing Choice Voucher Program (Section 8): The HCV Program allows low-income residents to find places to rent in the City. They are free to choose any house that meets minimal safety and health standards, which is confirmed by an LHA inspection. The rents must also be reasonable and within the fair market rent range for Lubbock. Residents in this program pay 30 percent of their income toward rent and the LHA pays the landlords the difference between what households can afford and the total rent.

Housing Choice Voucher Family Self-Sufficiency: The Family Self-Sufficiency (FSS) program is a voluntary program that assists families in becoming economically independent. FSS combines “case management, education, job training, and ongoing support through newsletters, workshops, support group meetings, and other appropriate services to aid the family in becoming self-sufficient.”

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- **Admissions and occupancy policies and procedures, including preferences in publicly supported housing**

- **Community opposition**
- **Displacement of residents due to economic pressures**
- **Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking**
- **Impediments to mobility**
- **Lack of access to opportunity due to high housing costs**
- **Lack of meaningful language access**
- **Lack of local or regional cooperation**
- **Lack of private investment in specific neighborhoods**
- **Lack of public investment in specific neighborhoods, including services and amenities**
- **Land use and zoning laws**
- **Loss of Affordable Housing**
- **Occupancy codes and restrictions**
- **Quality of affordable housing information programs**
- **Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs**
- **Source of income discrimination**
- **Other**

The lack of access to low poverty neighborhoods creates a barrier to advancement for many residents. These ***impediments to mobility*** mean residents who are in public housing in high poverty areas may not be able to access resources that are more abundant in low poverty areas.

Lubbock has a large Hispanic population and a relatively high LEP – Spanish speaking population and ***lack of meaningful language access*** may contribute to the severity of fair housing issues in the community.

Disability and Access Analysis

1. Population Profile

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

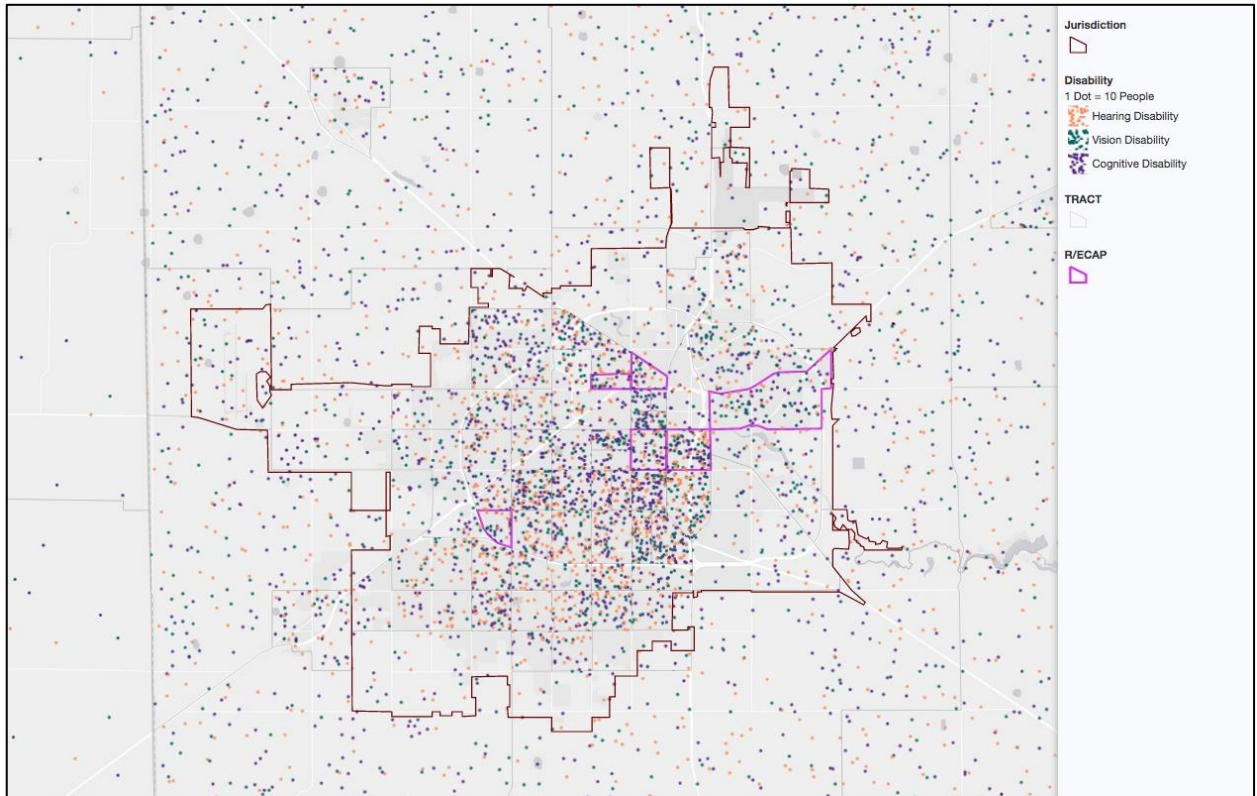
According to the HUD provided data, six types of disabilities were recorded in Lubbock. The most common disability is Ambulatory Difficulty (7.4 percent) in the City. The region has similar rates of disability.

Table: Disability by Type				
Disability Type	Lubbock, TX (Jurisdiction)		Lubbock, TX (Region)	
	#	%	#	%
Hearing difficulty	9,106	4.27%	11,866	4.41%
Vision difficulty	7,230	3.39%	9,111	3.38%
Cognitive difficulty	12,266	5.75%	15,335	5.69%
Ambulatory difficulty	15,770	7.40%	20,611	7.65%
Self-care difficulty	5,549	2.60%	7,127	2.65%
Independent living difficulty	9,430	4.42%	12,014	4.46%

Source: 2009-2013 ACS (HUD AFFHT0004, Table 13 - Disability by Type)
 Data Note 1: All % represent a share of the total population within the jurisdiction or region.
 Data Note 2: Percentages are calculated based on the total population age 5 years and older.

There is no clear pattern in disability living patterns and R/ECAPs or areas of segregation in Lubbock for individuals with hearing, vision, and cognitive disabilities. There are residents with disabilities in each Census Tract, but concentrations appear to be areas with higher populations.

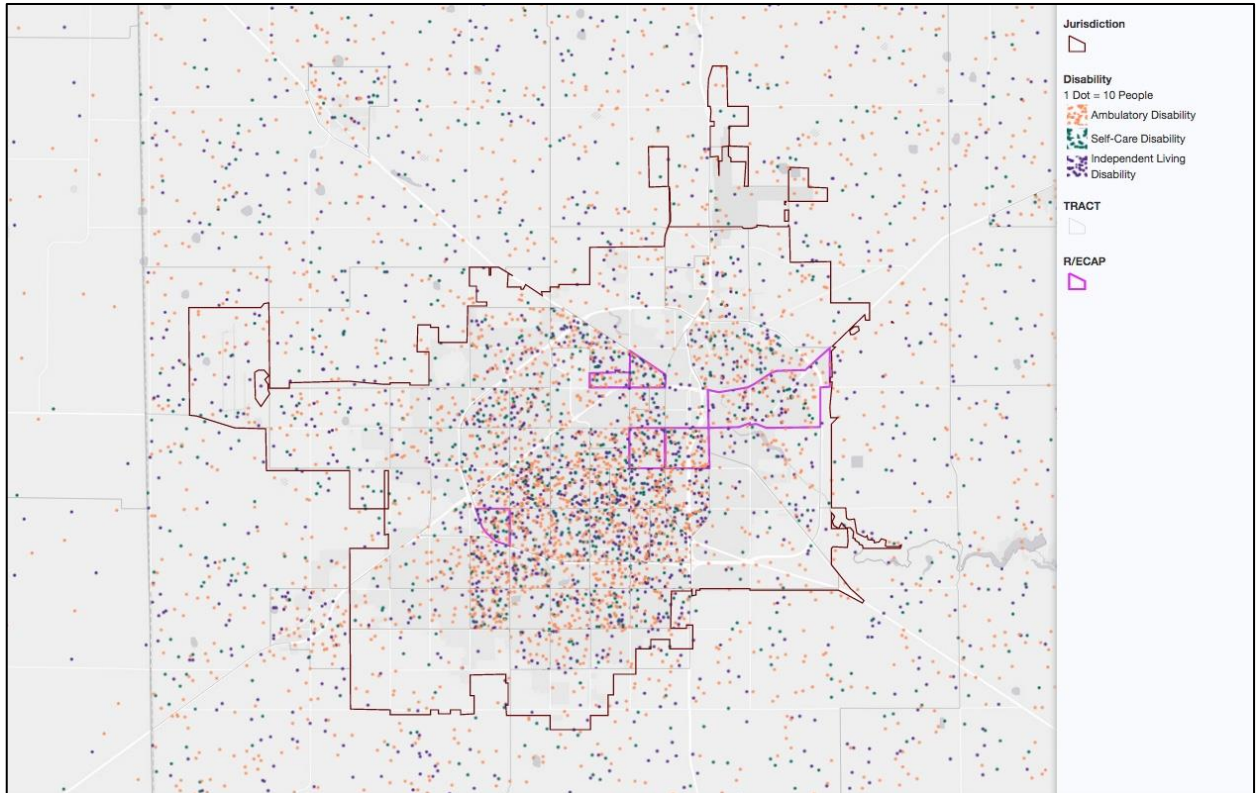
MAP: Disability by Type – Hearing, Vision and Cognitive



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

There is no clear pattern in disability living patterns and R/ECAPs or areas of segregation in Lubbock for individuals with ambulatory, self-care, or independent living disabilities. There are residents with disabilities in each Census Tract, but concentrations appear to be areas with higher populations.

MAP: Disability by Type – Ambulatory, Self-Care, and Independent Living

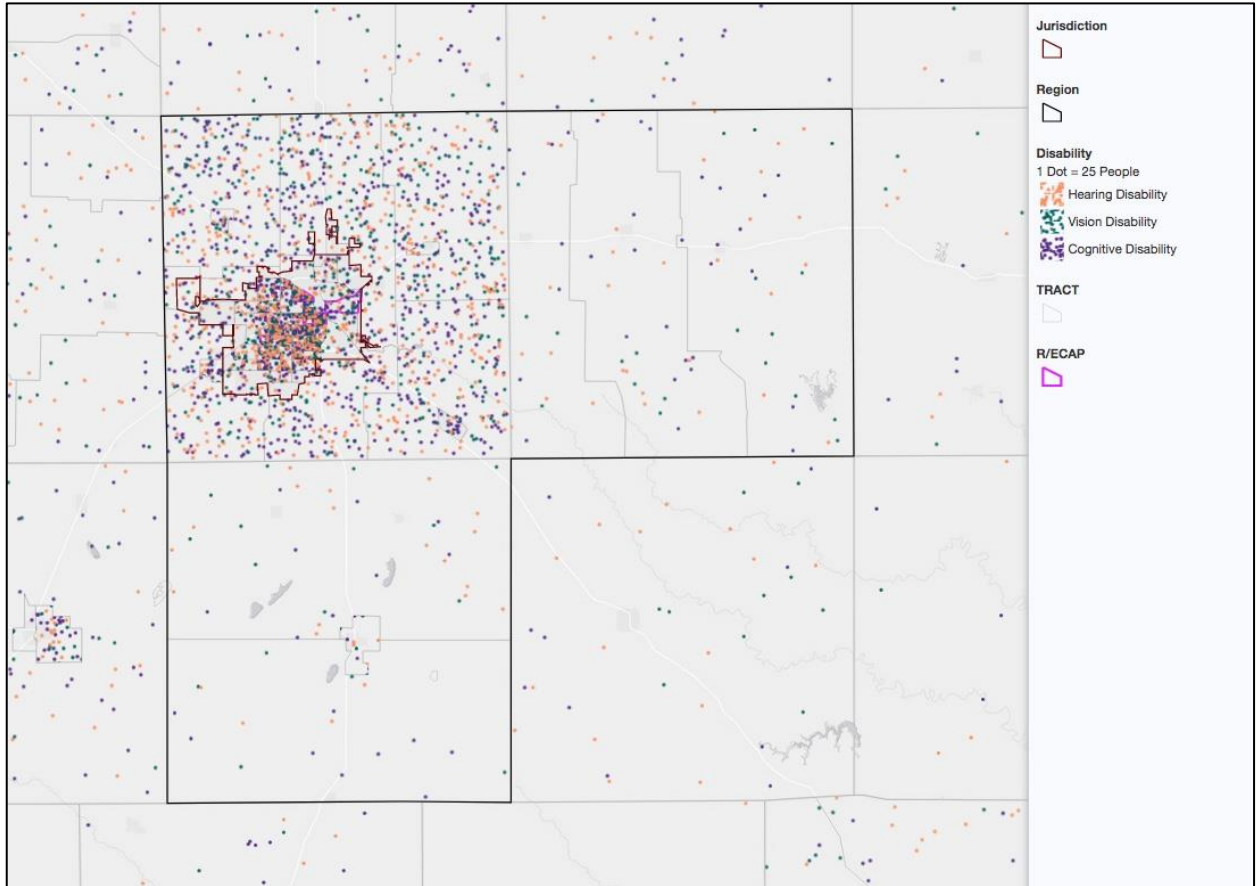


Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

Disability by Type (Region)

Regionwide, Census Tracts closer to the City of Lubbock have a much larger concentration of residents with hearing, vision, and cognitive disabilities. This is likely due to both the larger population of those tracts and the greater medical and support requirements of residents with disabilities. Rural environments often lack the support and medical care necessary to assist residents with disabilities.

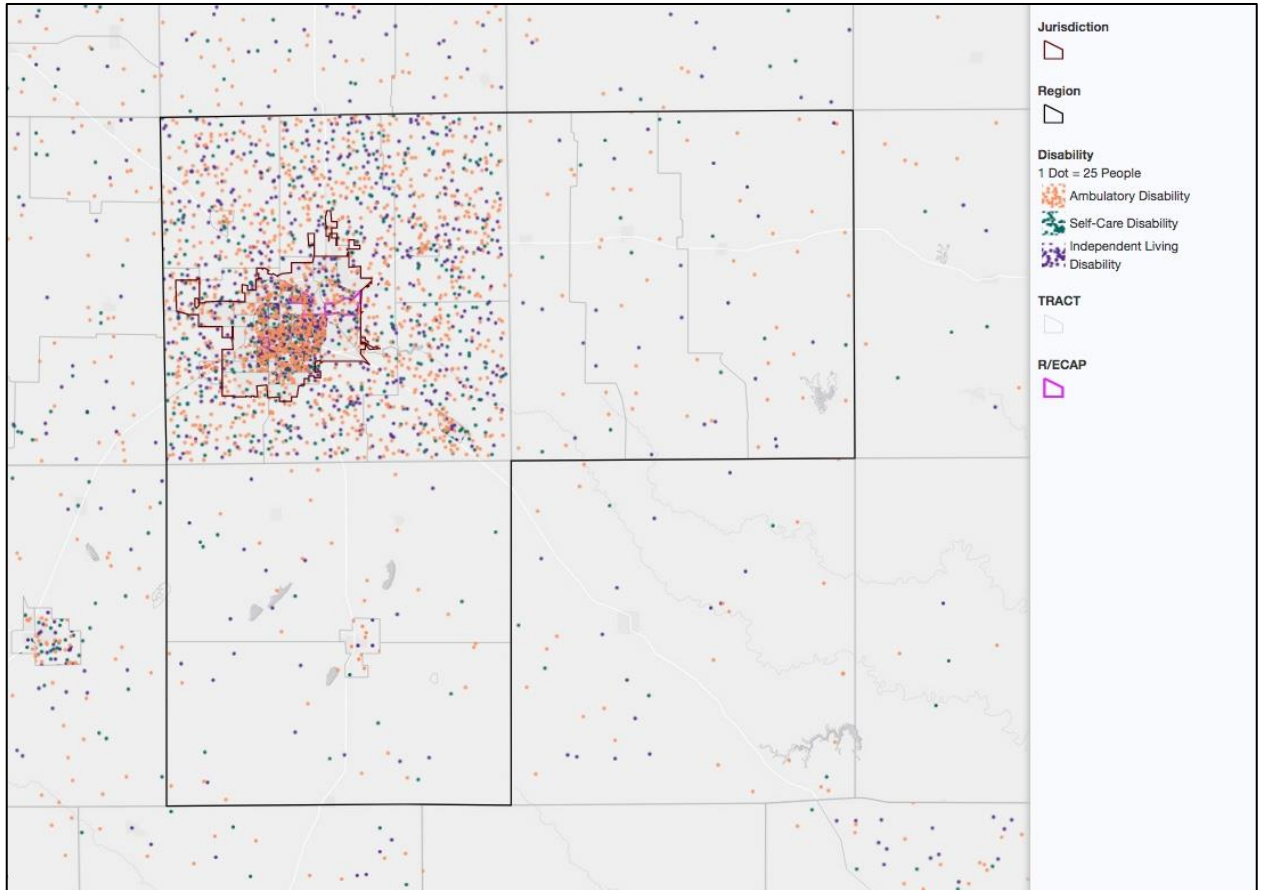
MAP: Disability by Type – Hearing, Vision and Cognitive (Region)



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

Regionwide, Census Tracts closer to the City of Lubbock have a much larger concentration of residents with ambulatory, self-care, and independent living disabilities. This is likely due to both the larger population of those tracts and the greater medical and support requirements of residents with disabilities. Rural environments often lack the support and medical care necessary to assist residents with disabilities.

MAP: Disability by Type – Ambulatory, Self-Care, and Independent Living (Region)



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

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

Disability by Age

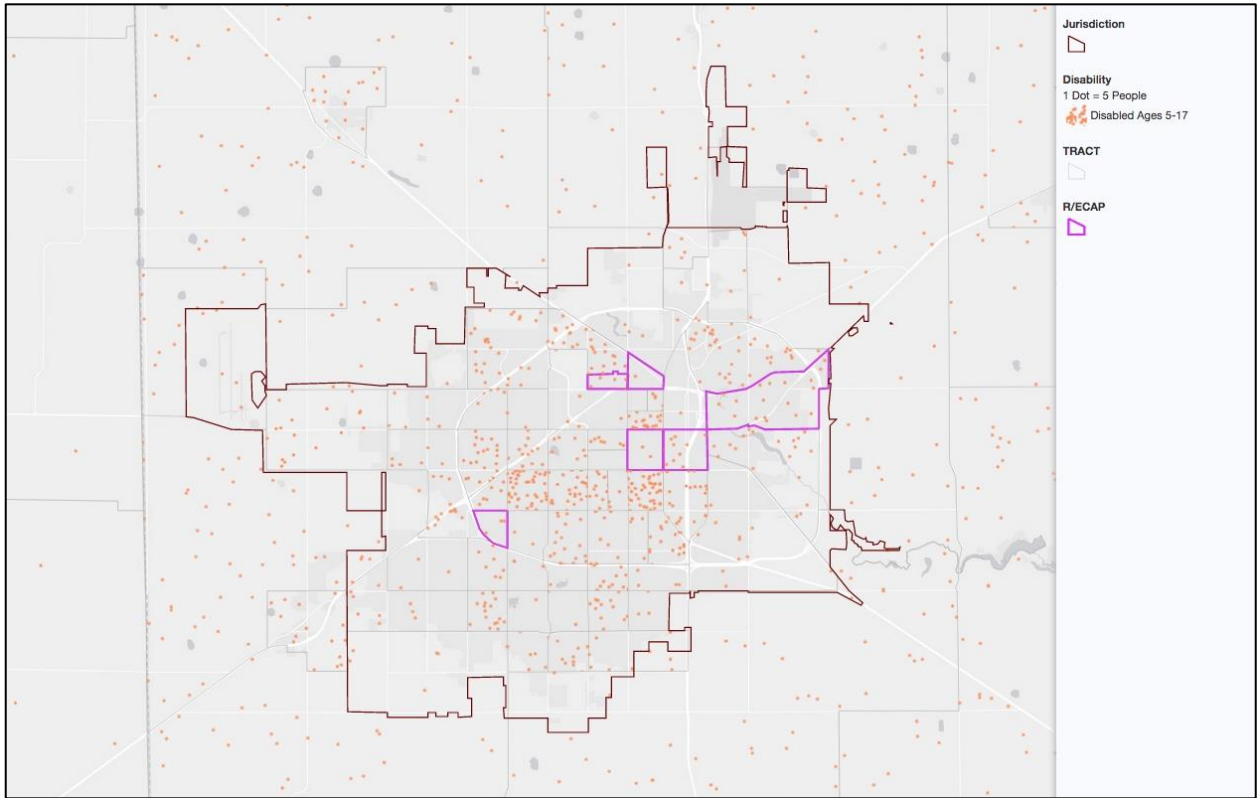
Most residents with a disability are between the ages of 18 and 64. In total, over 30,000 residents have a disability in Lubbock, with a third being elderly. Within each group, there is a higher percentage of residents with a disability for the elderly.

Table: Disability by Age Group				
	Lubbock, TX (Jurisdiction)		Lubbock, TX (Region)	
Disability Type	#	%	#	%
age 5-17 with Disabilities	2,897	1.36%	3,804	1.41%
age 18-64 with Disabilities	18,111	8.49%	22,358	8.30%
age 65+ with Disabilities	10,800	5.07%	14,390	5.34%
Source: 2009-2013 ACS (HUD AFFHT0004, Table 14 - Disability by Age Group)				
Data Note 1: All % represent a share of the total population within the jurisdiction or region.				

Persons Age 5-17 with Disabilities

Children with disabilities are in many Census Tracts throughout the City of Lubbock. However, there are a few tracts in the central area that have a greater concentration of children with disabilities than elsewhere. These are not in R/ECAP tracts.

MAP: Disability by Age, 5-17 Years Old

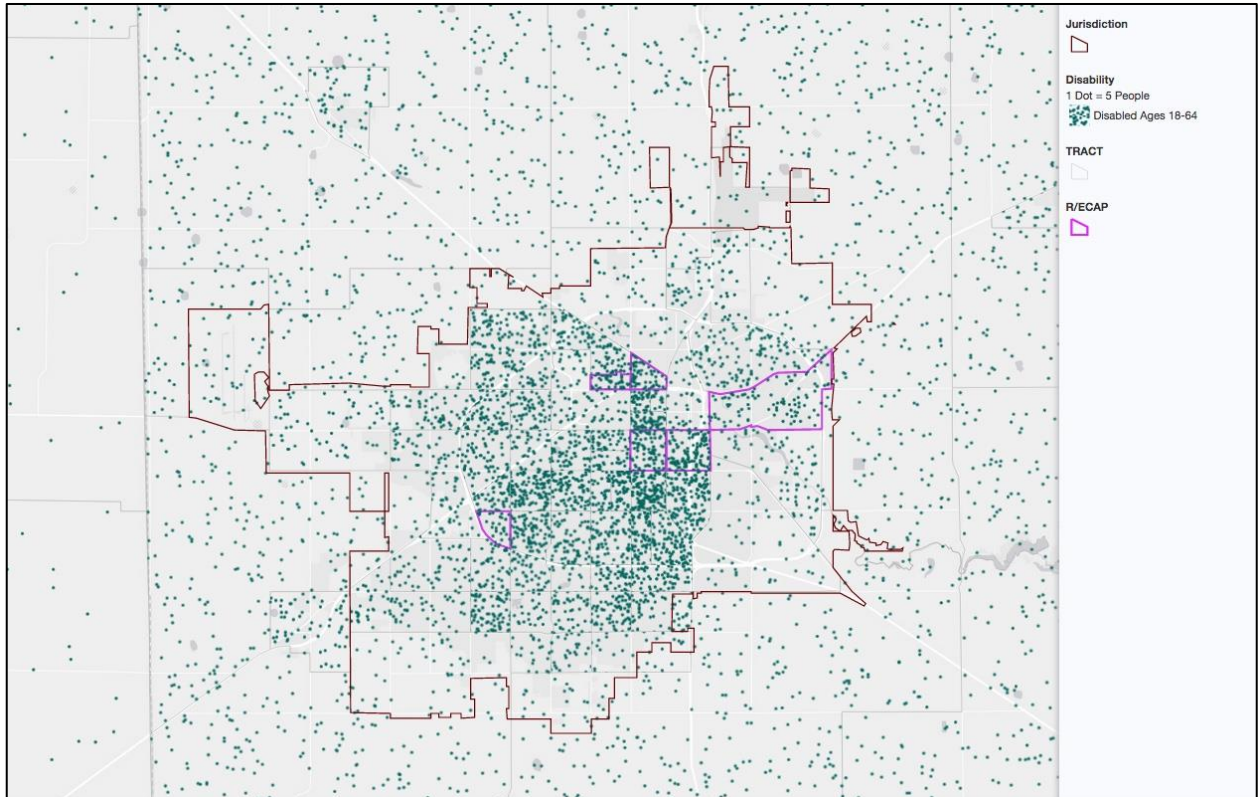


Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

Persons Age 18-64 with Disabilities

Working age adults with disabilities are found in every census tract in the City of Lubbock, but the eastern central area has the largest concentration. Five of the R/ECAP tracts appear to have a relatively large number of adults with disabilities.

MAP: Disability by Age, 18-64 Years Old

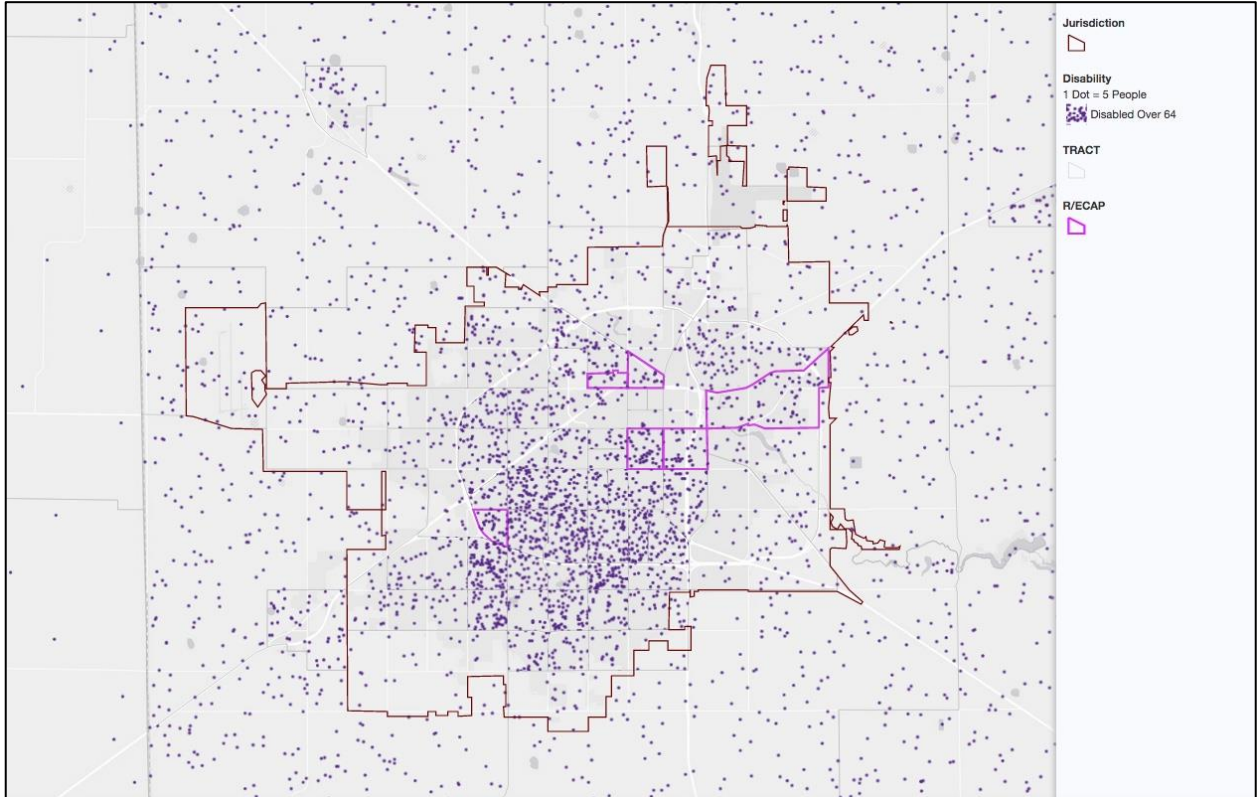


Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

Persons Age 65+ with Disabilities

Elderly residents with disabilities are more common in the southern portions of Lubbock. This includes one R/ECAP tract.

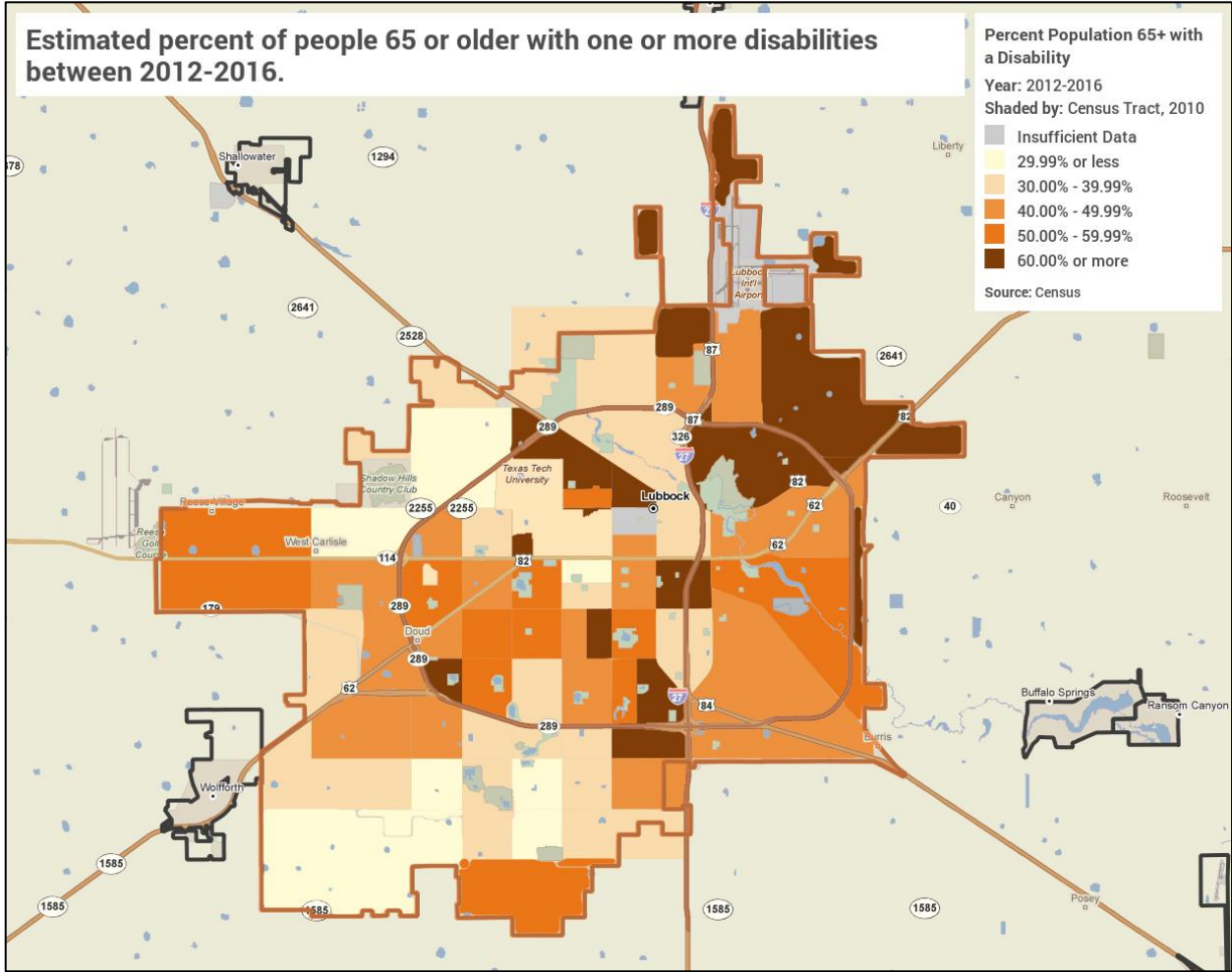
MAP: Disability by Age, 64 Years and Over



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

The following map shows the percentage of elderly residents with a disability, as opposed to a dot map which shows population. From this visualization it is clear that there are some concentrations of elderly residents with disabilities. Many census tracts, including three R/ECAP tracts have over 60 percent of the elderly residents present with a disability.

MAP: Population 65 Years and Over with a Disability (%)

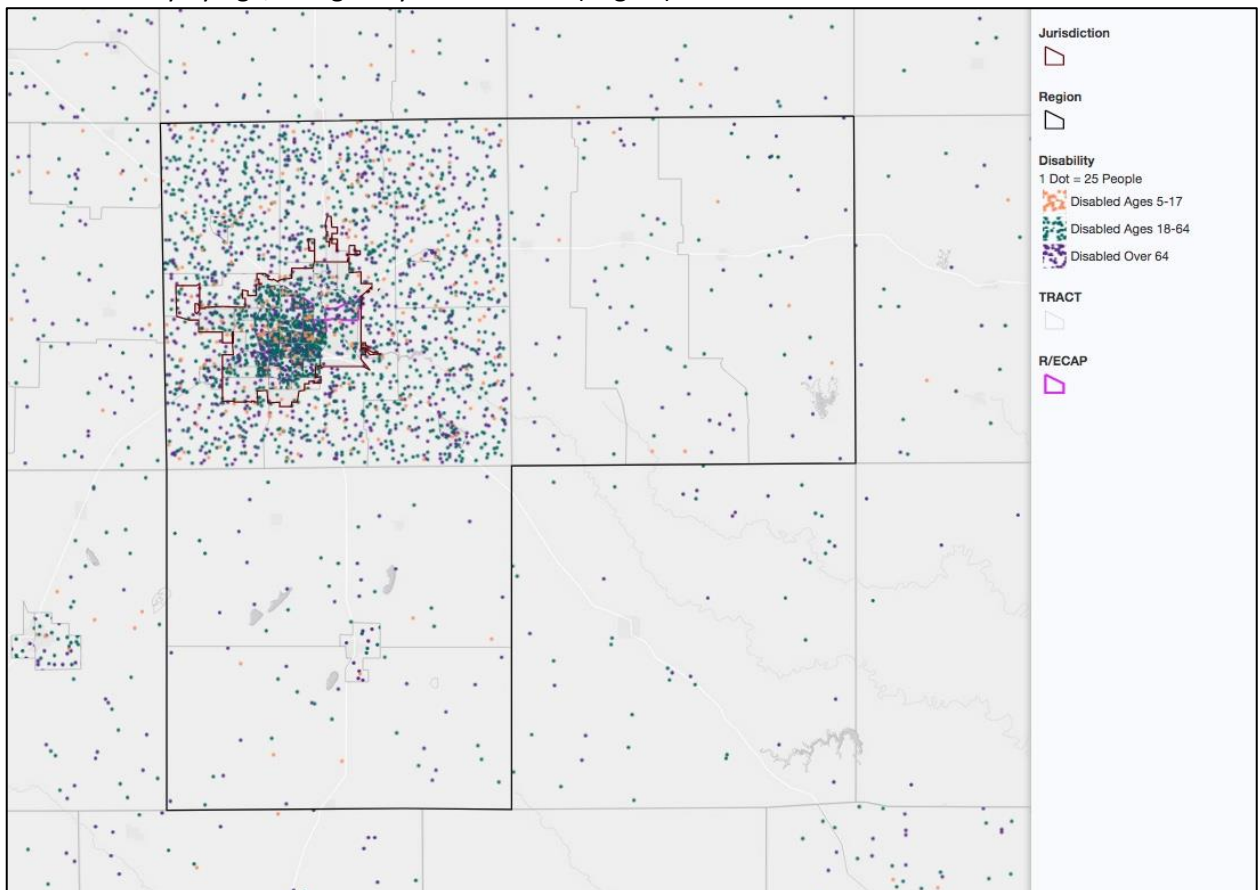


Source: 2012-2016 ACS via PolicyMap

Disability by Age (Region)

Regionwide, Census Tracts closer to the City of Lubbock have a much larger concentration of residents with a disability regardless of age. This is likely due to both the larger population of those tracts and the greater medical and support requirements of residents with disabilities. Rural environments often lack the support and medical care necessary to assist residents with disabilities.

MAP: Disability by Age, All Ages 5 years and over (Region)



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

2. Housing Accessibility

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

There is a lack of decent affordable housing units for the residents of Lubbock. There are plenty of houses in Lubbock to house the population, but there is a disconnect between the homes available and the homes needed by the population. High home values and rents result in much of the housing stock being too costly for large portions of the populations, particularly at-risk populations like the elderly, disabled, LEP, and foreign-born.

In Lubbock, Black, non-Hispanic residents are severely cost burdened nearly 25 percent of the time. This is a much higher rate of financial difficulty than the White, non-Hispanic population. Non-family households are also likely to experience severe cost burden.

Table: Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden*	Lubbock, TX (Jurisdiction)		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	8,705	55,590	15.66%
Black, Non-Hispanic	1,540	6,365	24.19%
Hispanic	4,225	23,290	18.14%
Asian or Pacific Islander, Non-Hispanic	298	1,885	15.81%
Native American, Non-Hispanic	30	253	11.86%
Other, Non-Hispanic	200	968	20.66%
<i>Total</i>	14,998	88,345	16.98%
Household Type and Size			
Family households, <5 people	4,554	45,325	10.05%
Family households, 5+ people	930	7,450	12.48%
Non-family households	9,520	35,580	26.76%
Source: 2009-2013 CHAS (HUD AFFHT0004, Table 10 - Demographics of Households with Severe Housing Cost Burden)			
Note 1: Severe housing cost burden is defined as greater than 50% of income.			
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.			
Note 3: The # households is the denominator for the % with problems and may differ from the # households for the table on severe housing problems.			

Rates of severe cost burden is similar at the regional level. The Black, non-Hispanic population and non-family households are again the most likely groups to face this financial difficulty.

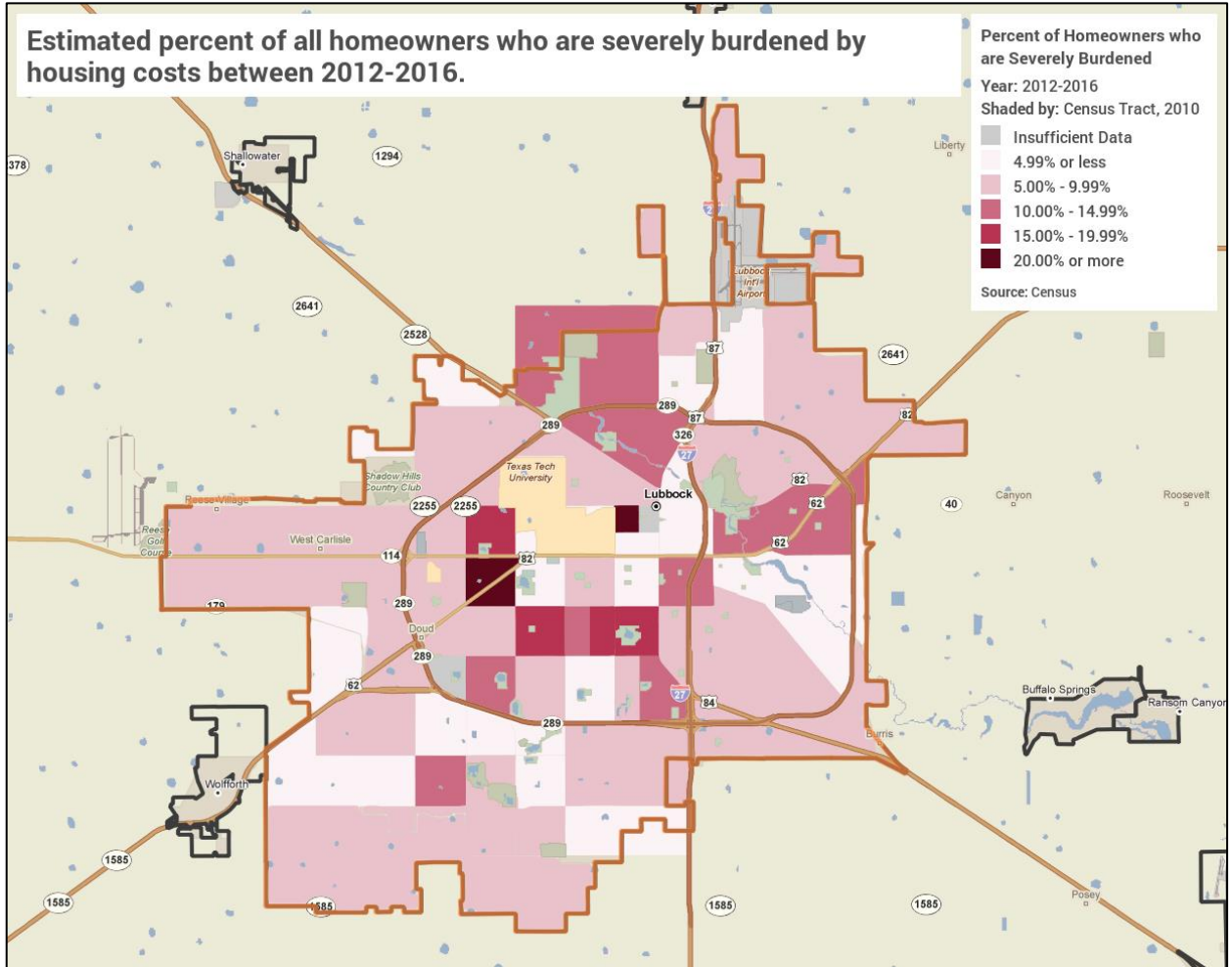
Table: Demographics of Households with Severe Housing Cost Burden (Region)			
Households with Severe Housing Cost Burden*	Lubbock, TX (Region)		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	9,700	70,269	13.80%

Black, Non-Hispanic	1,625	6,854	23.71%
Hispanic	4,860	29,080	16.71%
Asian or Pacific Islander, Non-Hispanic	298	1,950	15.28%
Native American, Non-Hispanic	40	298	13.42%
Other, Non-Hispanic	305	1,164	26.20%
<i>Total</i>	16,828	109,620	15.35%
Household Type and Size			
Family households, <5 people	5,565	58,641	9.49%
Family households, 5+ people	1,205	10,458	11.52%
Non-family households	10,051	40,527	24.80%
Source: 2009-2013 CHAS (HUD AFFHT0004, Table 10 - Demographics of Households with Severe Housing Cost Burden)			
Note 1: Severe housing cost burden is defined as greater than 50% of income.			
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.			
Note 3: The # households is the denominator for the % with problems and may differ from the # households for the table on severe housing problems.			

Location of Severely Cost Burdened Households

According to the most recent data provided by the US Census Bureau there are two census tracts where 20 percent or more of the homeowners are severely cost burdened. Both are near the downtown area near Texas Tech University.

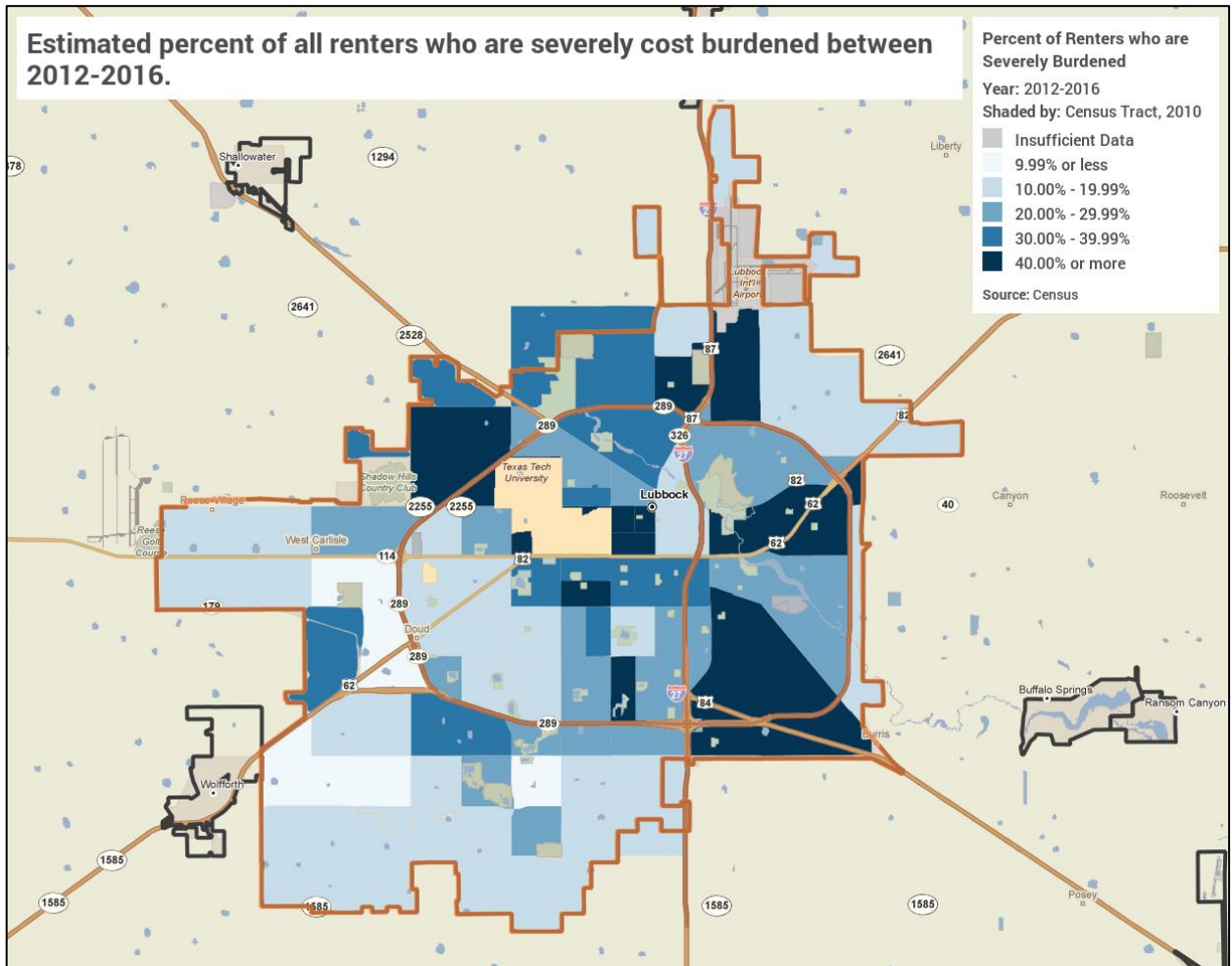
MAP: Severely Cost Burdened Homeowners



Source: 2012-2016 ACS via PolicyMap

Severely cost burdened renters are much more common than severely cost burdened homeowners. There are multiple Census Tracts throughout the City where 40 percent or more of the renters are severely cost burdened. This includes one R/ECAP tract on the eastern edge of the City.

MAP: Severely Cost Burdened Renters



Source: 2012-2016 ACS via PolicyMap

Public Housing Condition

The condition of public housing is critical in determining the availability of affordable housing for disabled residents who require assistance in the City of Lubbock. Although inspections may not occur every year, HUD releases physical inspection scores annually for public housing developments across the nation. Below are the inspection scores for Lubbock’s public housing developments.

Public Housing Physical Inspection Scores 2016

Site	Address	PHA	Score	Inspection Date
Behner Place/Mary Myers	5401 Utica Ave	LHA	92	1/5/2015
Cherry Point/36 South	1318 52nd St	LHA	97	1/6/2015
96 West	2412 Frankford Ave	LHA	90	10/19/2015
Park Meadows	2627 Oak Dr Apt 611	LHA	77	10/20/2015
Source: HUD				

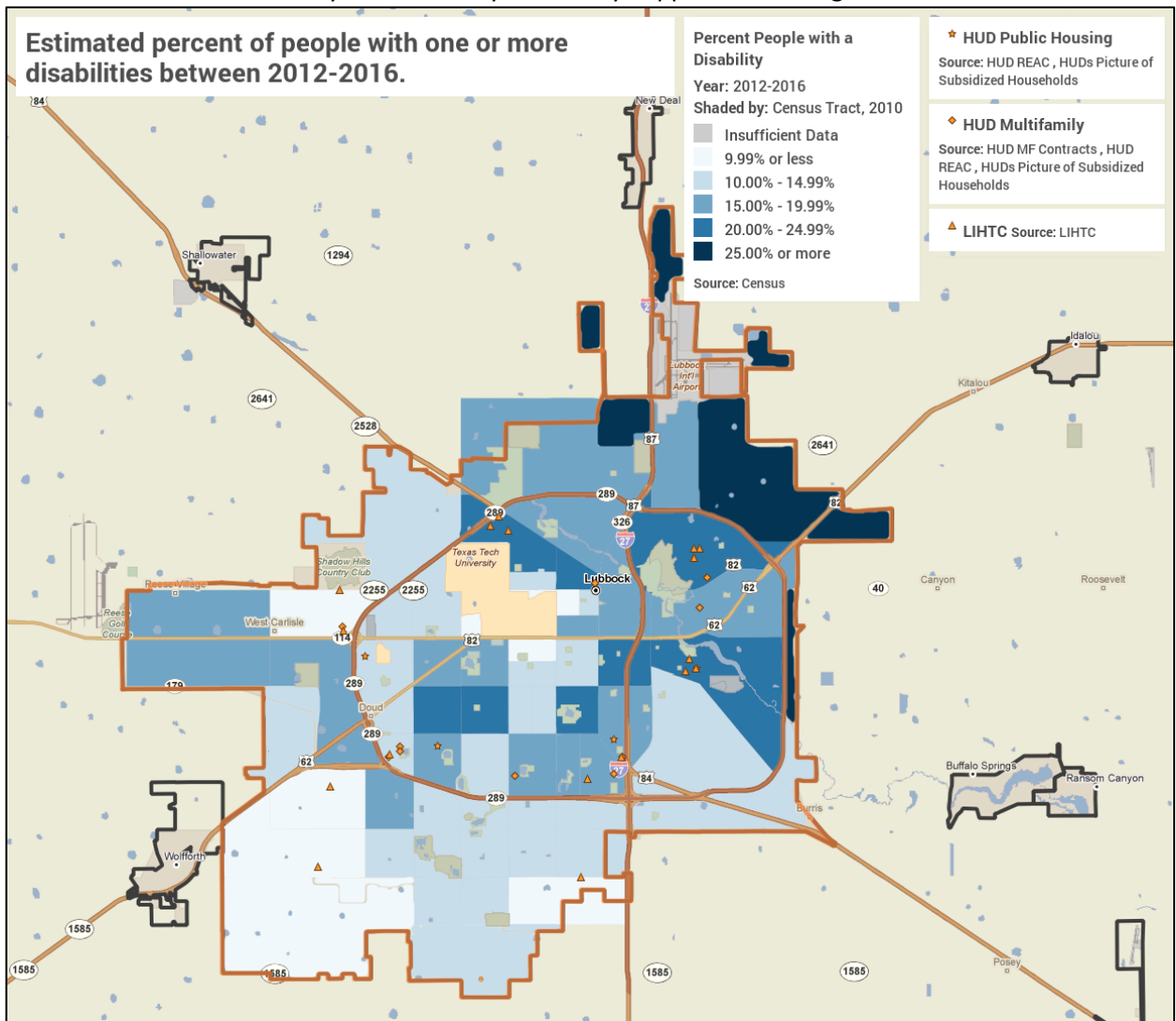
Overall, the public housing developments in Lubbock are above average except for one, Park Meadows. HUD physical inspection scores are deficiency based, meaning all development scores start at 100 points and each deficiency reduces the overall score. They are weighted by inspection areas: site (15), building exterior (15), building systems (20) common areas (15), and dwelling units (35). In general, high performing developments will have a score of 90 or above and troubled developments have a score of less than 60.

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

Accessible Publicly Supported Housing for Persons with a Disability

Publicly supported housing is primarily located in tracts on the eastern part of the city with a few in the northwest and southwest. These units are near census tracts with a relatively high number of residents with a disability.

MAP: Persons with a Disability and Proximity to Publicly Supported Housing

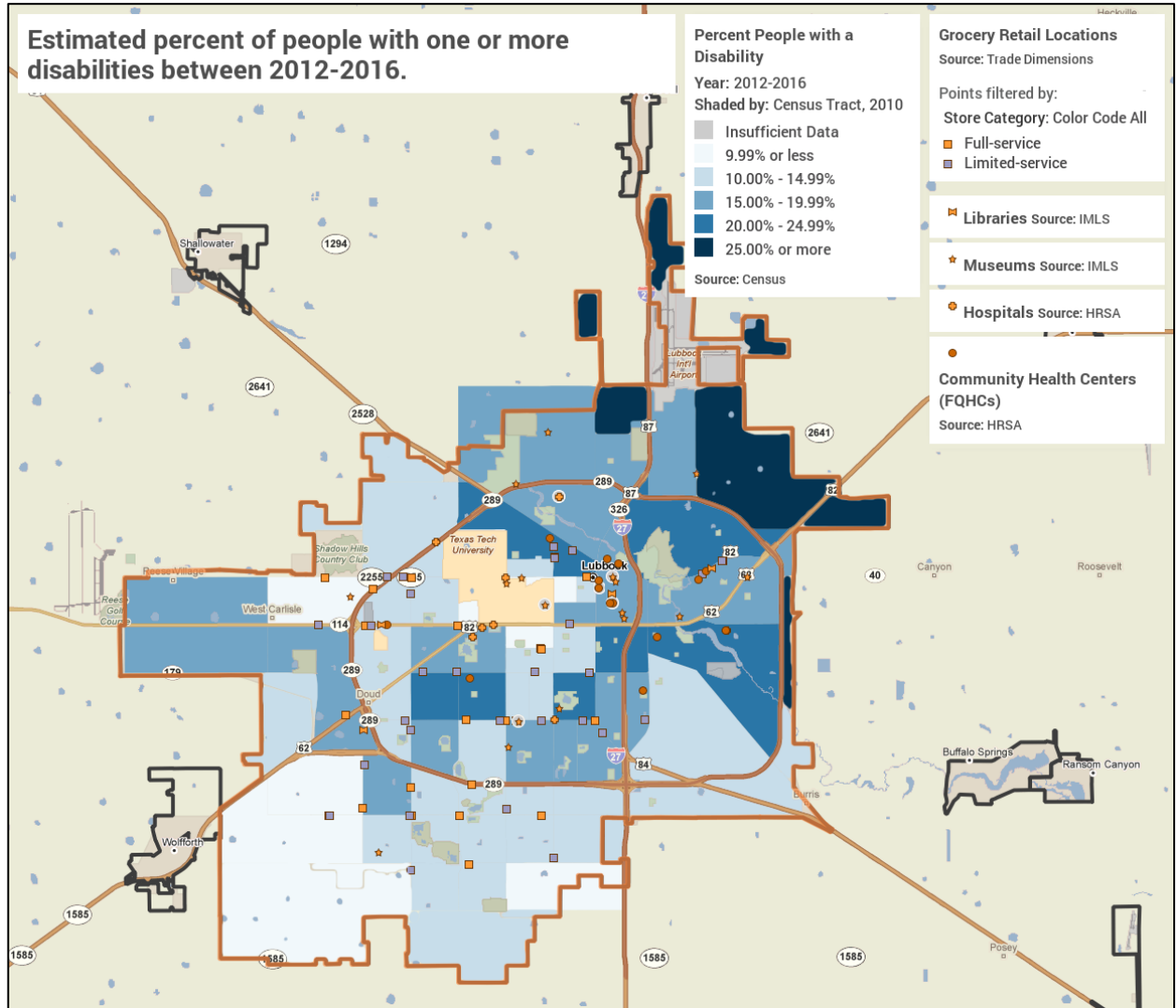


Source: 2012-2016 ACS, HUD, LIHTC via PolicyMap

Disability and Access

Libraries, museums, hospitals, and grocery locations are located throughout the City. Unfortunately, there are not any in the census tracts with the largest proportion of the population with a disability.

MAP: Disability and Access



Source: 2012-2016 ACS, Trade Dimensions, IMLS, HRSA via PolicyMap

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

The Lubbock Housing Authority is a HUD recognized and funded public housing authority. All HUD-funded programs and projects are required to conform to the ADA regulations and be Section 504 compliant.

While the City of Lubbock and the LHA promote and make reasonable accommodations for all persons with a disability it is difficult to cover the needs of all people with disabilities. The Housing Choice Voucher program has the highest percentage of residents with a disability, approximately 25 percent. Just over 13 percent of public housing and more than 10 percent of Project Based Section 8 housing has a resident with a disability. Residents have access to publicly supported housing but there is still a greater need in the community.

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

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

In 1991, the US Department of Justice defined “the most integrated setting appropriate to the needs of qualified individuals with disabilities” as “a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible.”

In 2011, they further reinforced this statement:

...those that provide individuals with disabilities opportunities to live, work, and receive services in the greater community, like individuals without disabilities. Integrated settings are located in mainstream society; offer access to community activities and opportunities at times, frequencies and with persons of an individual’s choosing; afford individuals choice in their daily life activities; and provide individuals with disabilities the opportunity to interact with non-disabled persons to the fullest extent possible.

Two factors immediately influence the ability to integrate the settings of persons with a disability: where the individual lives and how the individual will travel to places. Deciding where to live for an individual with a disability is often a complicated process with several layers of considerations, which can lead to less affordability and accessibility. As mentioned previously, residents with disabilities are spread across the City and region and are spread throughout the area with no significant concentration in segregated areas.

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

Eligible persons with a disability have access to publicly supported housing through the Lubbock Housing Authority. According to the HUD-provided data, there are 375 residents using public housing who have a disability in the city.

As reported, there are 46 persons who reside in public housing developments with a disability, 85 in project-based Section 8 housing, 3 in Other Multifamily units, and 241 in the HCV Program. The HCV program serves the most disabled residents, by far, and it allows residents to seek housing throughout the City that can accommodate their needs.

Table: Disability by Publicly Supported Housing Program Category		
Lubbock, TX (Jurisdiction)	People with a Disability	
	#	%
Public Housing	46	13.29%
Project-Based Section 8	85	11.53%
Other Multifamily	3	4.62%
HCV Program	241	24.87%
Lubbock, TX (Region)		
	#	%
Public Housing	46	13.29%
Project-Based Section 8	85	11.53%
Other Multifamily	3	4.62%
HCV Program	299	27.03%

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014 (HUD AFFHT0004, Table 15 - Disability by Publicly Supported Housing Program Category)
 Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

4. Disparities in Access to Opportunity

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

i. Government services and facilities

The City of Lubbock complies with the Americans with Disabilities Act (ADA) policy and provides notices that it will not discriminate against qualified individuals with disabilities in the City's services, programs, or activities. The City government does not discriminate based on any class or characteristic protected by law. For employment, the City does not discriminate based on disability in its hiring or employment practices and complies with all regulations by the U.S. Equal Employment Opportunity Commission under Title I of the ADA

To allow persons with a disability to participate equally with the City's programs, services, and activities, the City will generally, upon request, provide appropriate aid and services that lead to effective communication for persons with a disability. The City will also make all reasonable modifications to policies and programs to ensure those with disabilities have an equal opportunity to enjoy all its facilities, programs, services, and activities. Anyone in need of aid or service for effective communication should contact the point of contact for the event 48 hours before the scheduled event.

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

iii. Transportation

Transportation services for persons with a disability in the City of Lubbock is provided by Citibus. Citibus provides a demand response service to all eligible passengers who are unable to utilize the regular Citibus fixed service. This service runs from 4:30am until 8:00pm, Monday thru Saturday and is available for all residents who meet the criteria established by the Americans with Disabilities Act.

iv. Proficient schools and educational programs

Public schools in the City of Lubbock are compliant with the Americans with Disabilities Act. The school district administers all programs without discrimination against any person based on gender, race, color, national origin, religion, age, or disability.

v. Jobs

Of the 18,097 persons between the ages of 20 and 64 who had a disability in Lubbock, 44.4 percent are employed. When comparing the percentage of persons with a disability employed in certain industries with residents who do not have a disability, a higher percentage of residents with a disability were employed in the Construction Industry. One out of every ten employed resident with a disability is in the Construction industry but only 5.7 percent of the population without a disability is in Construction.

Table: Employment Status of Persons with a Disability				
	Total	Labor Force Participation Rate	Employment / Population Ratio	Unemployment Rate
Population 20 to 64 years old	146,900	76.40%	72.70%	4.60%
With any disability	18,097	49.20%	44.40%	9.60%
Source: 2012-2016 American Community Survey 5-Year Estimates (S2301)				

Employment Rights for Persons with a Disability

Persons with a disability are protected through the US Equal Employment Opportunity Commission (EEOC), which enforces the Americans with Disabilities Act of 1990 and Sections 501 and 505 of the Rehabilitation Act of 1973. The EEOC is responsible for enforcing federal laws that make discrimination against hiring an applicant or an employee illegal based on race, color, national origin, sex, religion, age, or disability. The laws apply to all types of work situations and include hiring, promotions, harassment, training, wages, benefits, and firing. The EEOC has the authority to investigate charges of discrimination against employers who are covered by the law. Charges of discrimination in hiring or in the workplace can be brought to the EEOC online at <https://www.eeoc.gov/contact/index.cfm> or by phone at (800) 669-4000 or TTY (800) 669-6820.

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

In accordance with the Americans with Disabilities Act of 1990, the City of Lubbock will not discriminate against qualified persons with a disability on the basis of any disability in its services, programs, activities, and employment. For anyone with a disability who wishes to participate in city services, programs and activities, or for hiring and employment accommodations, there is a procedure to obtain access. If any person with a disability feels the need to file a complaint alleging discrimination on the basis of disabilities in the provision of services, programs, activities, and employment related issues, a grievance procedure is also available.

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

Persons with a disability in Lubbock face the added difficulty of purchasing homes that must often be brought up to applicable state and local or Americans with Disabilities Act codes. These modifications can add considerable cost to purchasing and owning a home. According to the 2012-2016 American Community Survey 5-Year Estimate, persons with a disability earn 36 percent less than persons without a disability.

Table: Median Earnings in the Past 12 Months	
Lubbock, TX	Estimated Median Earnings
With a disability	\$17,465
Without a disability	\$23,804
Source: 2012-2016 American Community Survey 5-Year Estimates (B18140)	

5. Disproportionate Housing Needs

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

The City of Lubbock recognizes the importance of responding to the critical needs of disabled individuals to promote self-sufficiency and independent living opportunities. To examine this issue, an estimate of the number of persons by disability type is an important indicator in determining housing needs. HUD is provided data by disability type in Lubbock by the ACS, which defines disability based on questions asked to determine if the persons are one or more of the following categories:

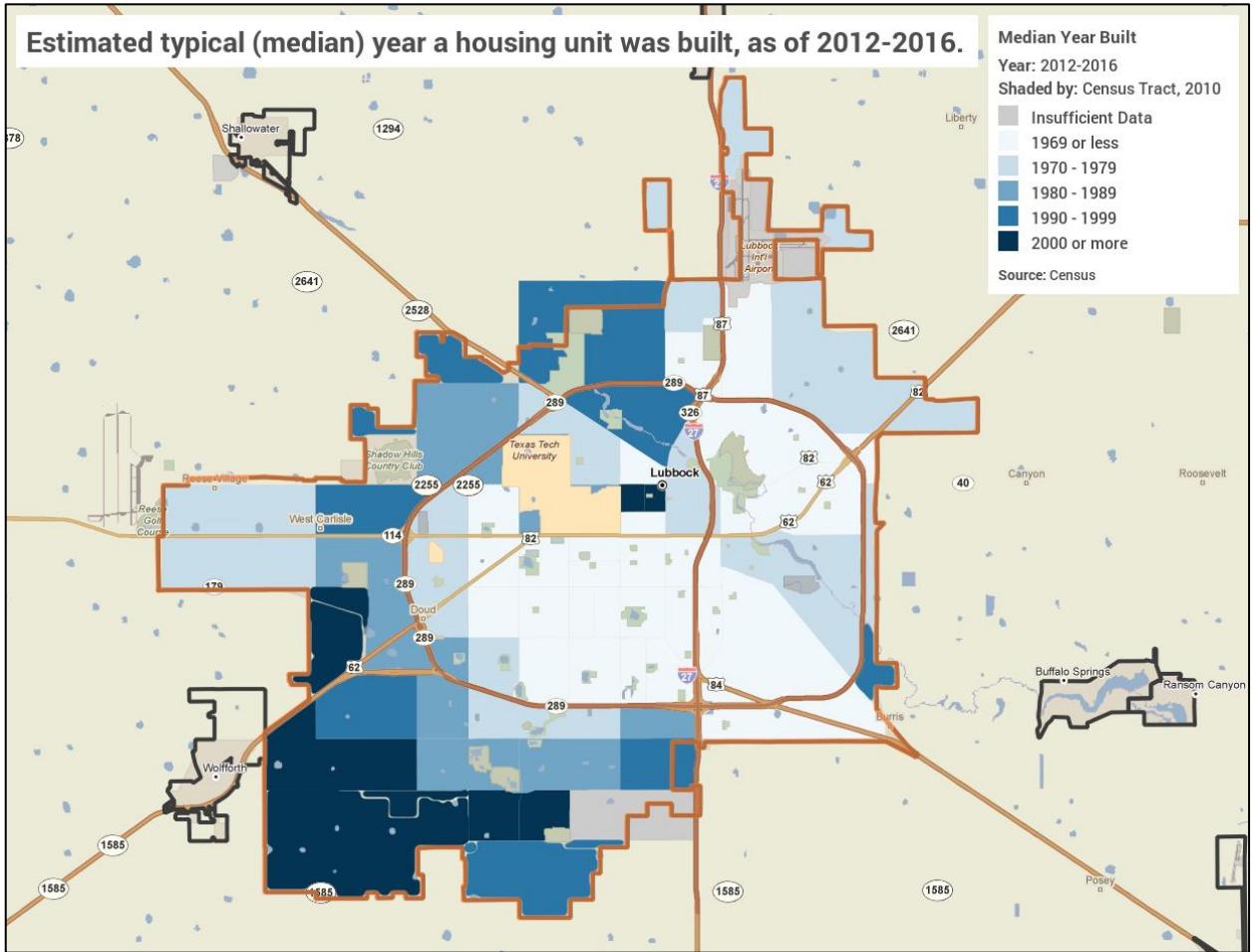
- Hearing Disability: Is this person deaf or do they have serious difficulty hearing?
- Visual Disability: Is this person blind or do they have serious difficulty seeing even when wearing glasses?
- Cognitive Disability: Due to a physical, mental, or emotional condition, does this person have serious difficulty concentration, remembering, or making decisions?
- Ambulatory Disability: Does this person have serious difficulty walking or climbing stairs?
- Self-Care Disability: Does this person have difficulty dressing or bathing?
- Independent Living Disability: Due to a physical, mental, or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor's office or shopping?

As mentioned above, affordability remains one of the most important issues persons with a disability face in achieving homeownership in Lubbock. For working individuals, persons with a disability make 36 percent less than a person without a disability.

Age of Housing

An additional barrier to housing for residents with a disability is the age of housing in Lubbock. Older homes are less likely to conform with ADA standards and may require costly modifications. In Lubbock, the median year built for homes in many census tracts was 1969 or earlier. Suburban tracts, particularly in the southwest are the only areas with homes built primarily in this century.

MAP: Median Year Housing Unit was Built



Source: 2012-2016 ACS via PolicyMap

6. Additional Information

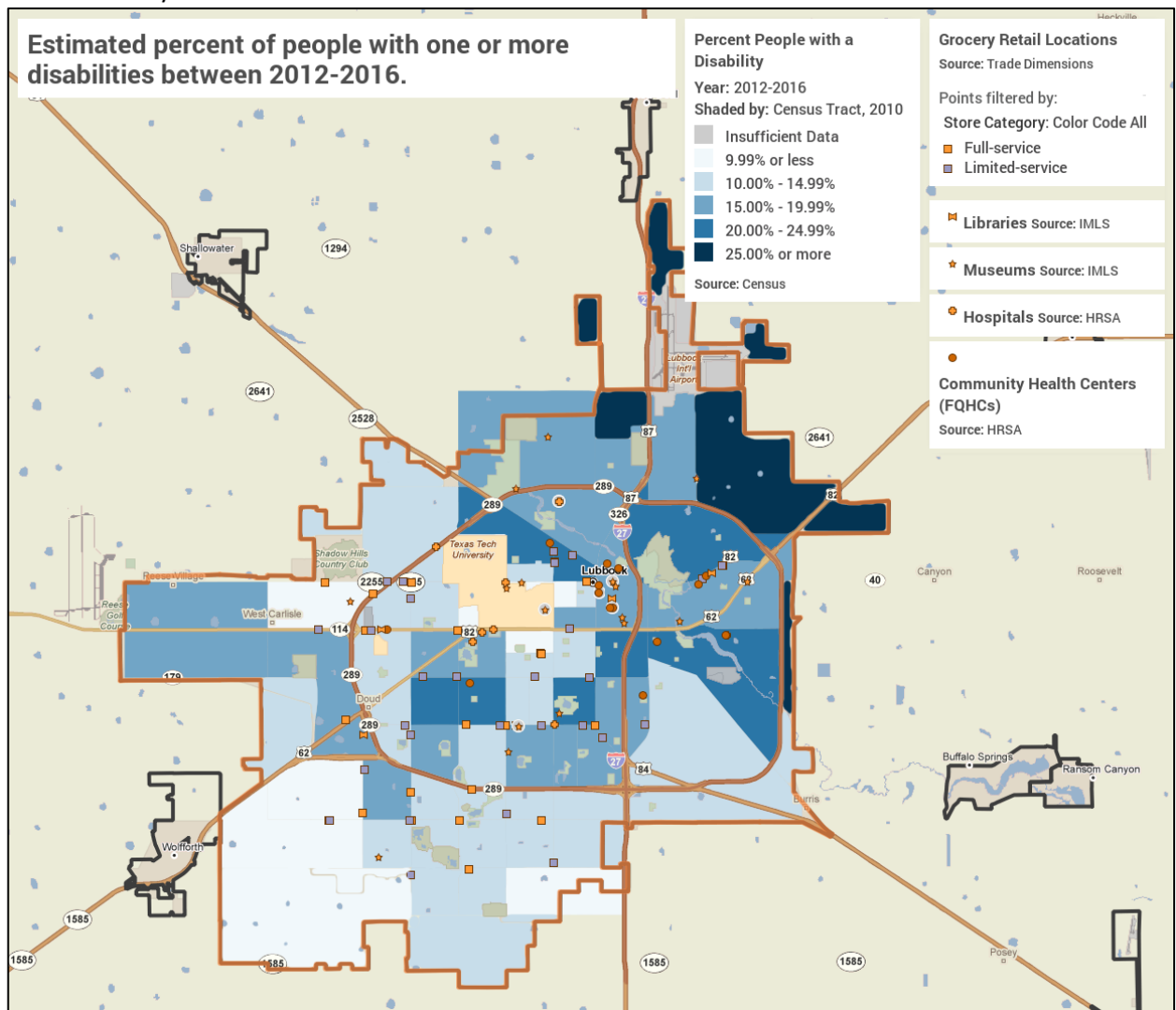
- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.**

No additional information is available beyond HUD-provided data.

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

It is necessary for planners to consider the needs of residents with disabilities. There are two primary issues to take into consideration: where residents with disabilities live and how accessible important resources are. Recreation, healthcare, and grocery retail centers need to be near residents with disabilities and/or transportation options must exist. Currently, the majority of these locations are found close to the downtown area of Lubbock, which is not necessarily accessible to census tracts with a large number of residents with disabilities.

MAP: Disability and Access



Source: 2012-2016 ACS, Trade Dimensions, IMLS, HRSA via PolicyMap

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings
- Other

There is a ***lack of affordable, integrated housing for individuals who need supportive services*** for persons with a disability in Lubbock. The housing stock in Lubbock is relatively old and older homes do not accommodate the needs of disabled residents. Additional resources are needed to upgrade and assist residents with disabilities in acquiring safe, secure housing.

Throughout the city the ***loss of affordable housing*** is a contributing factor. Residents with disabilities are particularly vulnerable to rising housing costs due to lower wages, fixed incomes, and increased medical and housing costs.

While the Lubbock Housing Authority provides a significant amount of housing for residents with disabilities, there is still a need for greater ***access to publicly supported housing for persons with disabilities.***

Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved:

- **A charge or letter of finding from HUD concerning a violation of a civil rights-related law;**
- **A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;**
- **Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;**
- **A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;**
- **A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or**
- **A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.**

The following cases were filed with HUD’s Department of Fair Housing and Economic Opportunity between 2008 and 2017.

YEAR	TOTAL FILINGS	BASES CITED					
		Race	Sex	Disability	Familial Status	National Origin	Religion
2008	6	4	2	5			
2009	7	2			5		
2010	4		1		2	1	
2011	5	3	2	2			
2012	3	3		1	1		
2013	5	3	1			1	
2014	1			1			
2015	9			9			
2016	3			2	1		
2017	3	1	1	3			
TOTAL	46	16	7	23	9	2	0

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The City of Lubbock and Lubbock County do not have additional fair housing laws, but the State of Texas has a fair housing law that is similar to the Federal Fair Housing Act.

According to the Texas Department of Housing and Community Affairs:

“the Texas Fair Housing Act protects your right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.”

The Texas Fair Housing Act is found in Title 15, Chapter 301 of the Texas State Property Code. Subchapter B states:

“SUBCHAPTER B. DISCRIMINATION PROHIBITED

Sec. 301.021. SALE OR RENTAL. (a) A person may not refuse to sell or rent, after the making of a bona fide offer, refuse to negotiate for the sale or rental of, or in any other manner make unavailable or deny a dwelling to another because of race, color, religion, sex, familial status, or national origin

(b) A person may not discriminate against another in the terms, conditions, or privileges of sale or rental of a dwelling or in providing services or facilities in connection with a sale or rental of a dwelling because of race, color, religion, sex, familial status, or national origin.

(c) This section does not prohibit discrimination against a person because the person has been convicted under federal law or the law of any state of the illegal manufacture or distribution of a controlled substance.

Sec. 301.022. PUBLICATION. A person may not make, print, or publish or effect the making, printing, or publishing of a notice, statement, or advertisement that is about the sale or rental of a dwelling and that indicates any preference, limitation, or discrimination or the intention to make a preference, limitation, or discrimination because of race, color, religion, sex, disability, familial status, or national origin.

Sec. 301.023. INSPECTION. A person may not represent to another because of race, color, religion, sex, disability, familial status, or national origin that a dwelling is not available for inspection for sale or rental when the dwelling is available for inspection.

Sec. 301.024. ENTRY INTO NEIGHBORHOOD. A person may not, for profit, induce or attempt to induce another to sell or rent a dwelling by representations regarding the entry or prospective entry into a neighborhood of a person of a particular race, color, religion, sex, disability, familial status, or national origin.

Sec. 301.025. DISABILITY. (a) A person may not discriminate in the sale or rental of, or make unavailable or deny, a dwelling to any buyer or renter because of a disability of:

(1) the buyer or renter;

(2) a person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or

(3) any person associated with the buyer or renter.

(b) A person may not discriminate against another in the terms, conditions, or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with the dwelling because of a disability of:

(1) the other person;

(2) a person residing in or intending to reside in that dwelling after it is sold, rented, or made available; or

(3) any person associated with the other person.

(c) In this section, discrimination includes:

(1) a refusal to permit, at the expense of the person having a disability, a reasonable modification of existing premises occupied or to be occupied by the person if the modification may be necessary to afford the person full enjoyment of the premises;

(2) a refusal to make a reasonable accommodation in rules, policies, practices, or services if the accommodation may be necessary to afford the person equal opportunity to use and enjoy a dwelling; or

(3) the failure to design and construct a covered multifamily dwelling in a manner:

(A) that allows the public use and common use portions of the dwellings to be readily accessible to and usable by persons having a disability;

(B) that allows all doors designed to allow passage into and within all premises within the dwellings to be sufficiently wide to allow passage by a person who has a disability and who is in a wheelchair; and

(C) that provides all premises within the dwellings contain the following features of adaptive design:

(i) an accessible route into and through the dwelling;

(ii) light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;

(iii) reinforcements in bathroom walls to allow later installation of grab bars; and

(iv) kitchens and bathrooms that are usable and have sufficient space in which an individual in a wheelchair can maneuver.

(d) Compliance with the appropriate requirements of the American National Standard for buildings and facilities providing accessibility and usability for persons having physical disabilities, commonly cited as "ANSI A 117.1," satisfies the requirements of Subsection (c)(3)(C).

(e) Subsection (c)(3) does not apply to a building the first occupancy of which occurred on or before March 13, 1991.

(f) This section does not require a dwelling to be made available to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals or whose tenancy would result in substantial physical damage to the property of others.

(g) In this subsection, the term "covered multifamily dwellings" means:

- (1) buildings consisting of four or more units if the buildings have one or more elevators; and
- (2) ground floor units in other buildings consisting of four or more units.

Sec. 301.026. RESIDENTIAL REAL ESTATE RELATED TRANSACTION. (a) A person whose business includes engaging in residential real estate related transactions may not discriminate against another in making a real estate related transaction available or in the terms or conditions of a real estate related transaction because of race, color, religion, sex, disability, familial status, or national origin.

(b) In this section, "residential real estate related transaction" means:

(1) the making or purchasing of loans or the provision of other financial assistance:

- (A) to purchase, construct, improve, repair, or maintain a dwelling; or
- (B) to secure residential real estate; or

(2) the selling, brokering, or appraising of residential real property.

Sec. 301.027. BROKERAGE SERVICES. A person may not deny another access to, or membership or participation in, a multiple-listing service, real estate brokers' organization, or other service, organization, or facility relating to the business of selling or renting dwellings, or discriminate against a person in the terms or conditions of access, membership, or participation in such an organization, service, or facility because of race, color, religion, sex, disability, familial status, or national origin."

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Lubbock Housing Authority: Administers public housing in Lubbock and adheres to federal and local fair housing laws in ADA requirements.

Texas Department of Housing and Community Affairs: The TDHCA is committed to meeting HUD requirements to expand fair housing choice and opportunities. Complaints can be filed with the Texas Workforce Commission.

4. Additional Information

- a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.**

Unlike five other Texas jurisdictions (Austin, Corpus Christi, Dallas, Fort Worth, and Garland), there is no local public entity certified as a Fair Housing Assistance Program authorized to enforce fair housing in Lubbock. The Texas Workforce Commission is a statewide resource that facilitates the resolution of fair housing complaints, provides information about anti-discrimination laws, and promotes equal housing opportunities.

Information about submitting a complaint is available at:

<http://www.twc.state.tx.us/partners/how-submit-housing-discrimination-complaint>

- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.**

Some organizations within the City provide limited fair housing education opportunities such as Habitat for Humanity and Legal Aid.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

There is a ***lack of local private fair housing outreach and enforcement*** and ***lack of local public fair housing enforcement*** in the City of Lubbock. The only available resource is a statewide organization that is responsible for the majority of the state.

There is also a ***lack of local fair housing laws*** to provide protection for residents. The lack of a local housing law does not inhibit protected classes from receiving fair housing but there are additional at-risk residents who could benefit from additional housing protection.

1,250 Units or fewer PHA Insert - LHA

Lubbock Housing Authority

This section is only to be completed when a PHA with 1,250 or fewer combined public housing units and housing choice vouchers partners with a Local Government, when the Local Government is the lead entity in the joint or regional Assessment of Fair Housing. A collaborating PHA's analysis of fair housing issues in its Assessment of Fair Housing may either be conducted by using this section or sections V.A.-E. of the Assessment Tool for its service area and region, along with all other sections in this Assessment Tool, and as directed by the questions and instructions.

1. Demographics

Describe demographic patterns in the PHA's service area (and region, if applicable). Explain how demographic trends have changed over time.

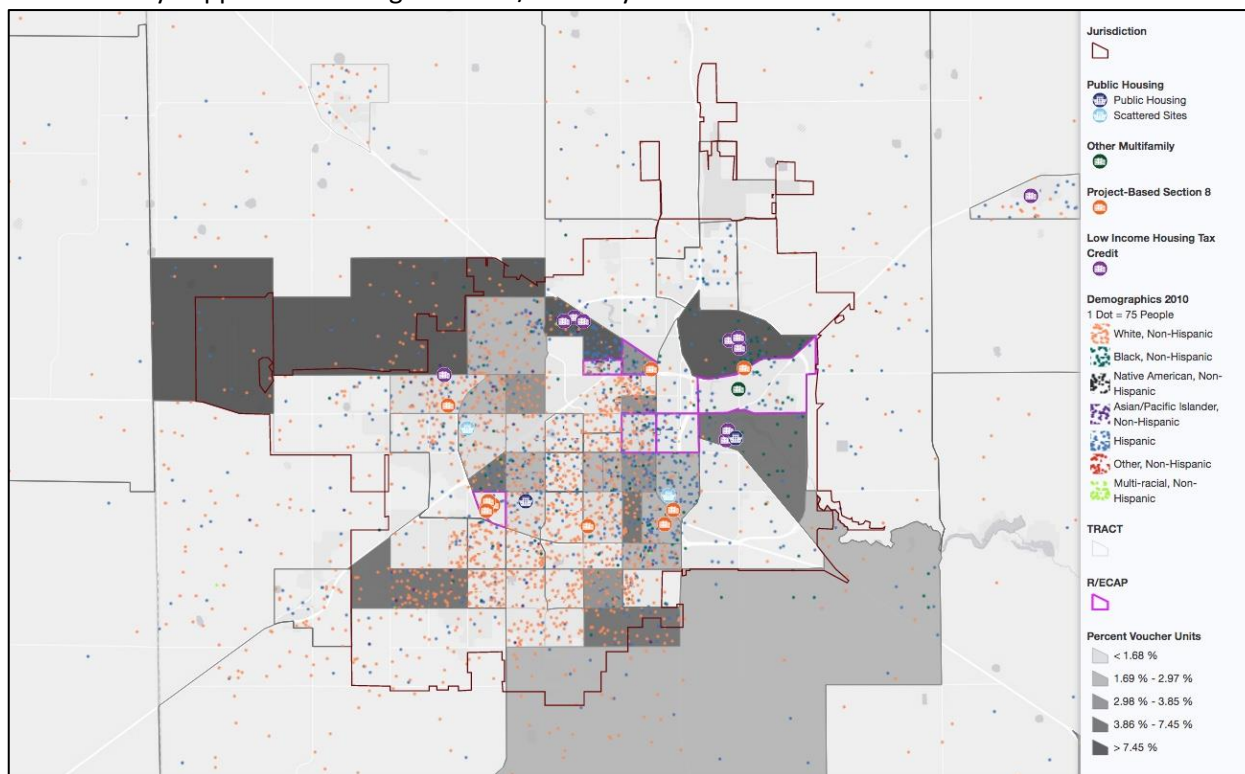
The Lubbock Housing Authority of the City of Lubbock (LHA) is a public agency that provides subsidized housing to LMI individuals and families. LHA operates both Public Housing and the Section 8 Housing Choice Voucher Program. The PHA's service area covers the entire City of Lubbock.

As highlighted previously in this document, non-Hispanic Whites are a slight majority in Lubbock making up 56 percent of the population. Hispanic residents are the second largest demographic and make up almost one-third of the population. The third most common racial demographic is Black, non-Hispanic with 8.1 percent of the population.

Since 1990, the PHA’s service area has undergone some demographic shifts. The proportion of the population who identify as White, non-Hispanic has reduced from 67.6 percent to 55.7 percent. This 12 percent reduction nearly perfectly mirrors the 10 percent increase in Hispanic-identified residents. Overall, the Hispanic population has grown significantly in 20 years from approximately 42,000 people to approximately 74,000 people. Along with this demographic shift there has been greater racial and ethnic integration within the City.

LHA distributes housing vouchers across a large part of the City, publicly supported housing is clustered in a few census tracts on the outer ring of the downtown area. The following HUD provided map displays the geographic location of publicly supported housing. Of the nine LIHTC locations are in three census tracts and these are all census tracts that border a R/ECAP. Darker shaded areas show a higher voucher concentration.

MAP: Publicly Supported Housing and Race/Ethnicity



Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, Decennial Census. (HUD AFFHT0004)

A full demographic summary in the jurisdiction and region can be found in the section “Demographic Summary”.

2. Segregation/Integration

Describe any areas of segregation and integration in the PHA's service area (and region, if applicable). Identify the protected class groups living in any such area. Explain how any area of segregation has changed over time.

Over the last 20 years the City of Lubbock has become increasingly integrated, but there are still areas with relative segregation. The southwest areas of the service area are primarily White, non-Hispanic and the eastern part of the City have a larger Hispanic and Black, non-Hispanic population. In 1990, these patterns of segregation were more pronounced.

A full description of Segregation and Integration issues in the jurisdiction and region can be found in the section "Segregation/Integration".

3. R/ECAPs

Describe the locations of R/ECAPs, if any, in the PHA's service area (and region, if applicable). Identify the protected class groups living in R/ECAPs and describe how R/ECAPs have changed over time.

There are six R/ECAP tracts in LHA's service area. These tracts have a disproportionately large minority population when compared to the City as a whole. Only 28 percent of the R/ECAP population is White, non-Hispanic. The Black, non-Hispanic population makes up 12 percent of R/ECAP tracts and Hispanic residents make up 54 percent.

A full description of the R/ECAP tracts in the jurisdiction and region can be found in the section "Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)".

4. Disparities in Access to Opportunity

Describe any disparities in access to the following opportunities for households in the service area (and region, if applicable), based on protected class:

- **Educational opportunities**
- **Employment opportunities**
- **Transportation opportunities**
- **Low poverty exposure opportunities**
- **Environmentally healthy neighborhood opportunities**

The PHA's service area includes the entire City of Lubbock and includes the same disparities in access to opportunities. There are two protected classes that have a significant disparity in access to educational opportunities. The Black, non-Hispanic and Hispanic populations have significantly lower scores on the School Proficiency Index and live in geographic areas that lack access to proficient schools. Living patterns are highly related to educational opportunities.

Employment opportunities in the service area also so a disparity in access to opportunities when it comes to employment. The Black, non-Hispanic and Hispanic populations have lower Labor Market

Index scores than other racial or ethnic groups. These populations are less likely to be involved in the labor market and/or have college degrees.

Exposure to poverty is much more common for both Black, non-Hispanic and Hispanic populations. These two protected classes both have significantly lower scores on the Low Poverty Index. Poverty is also highly correlated with living patterns.

Throughout the PHA's service area access transportation opportunities and access to environmentally healthy neighborhoods are relatively uniform. There is very little disparity in access in these two areas.

Overall, the populations that are more populous in publicly supported housing are also the populations that have disparities in access to opportunities.

A full description of the disparities in access to opportunities in the jurisdiction and region can be found in the section "Disparities in Access to Opportunity".

5. Disproportionate Housing Needs

Describe which protected class groups in the PHA's service area (and region, if applicable) experience higher rates of housing problems (housing cost burden, severe housing cost burden, substandard housing conditions, and overcrowding).

Black, non-Hispanic and Hispanic households have disproportionately higher rates of housing problems in the PHA's service area. Slightly over one-third of the overall population have housing problems but nearly 50 percent of the Black, non-Hispanic population and 42 percent of the Hispanic population have housing problems.

The overwhelming causes of housing problems in the PHA's service area are related to cost burden. While 17 percent of City population were severely cost burdened, nearly 25 percent of the Black, non-Hispanic and over 18 percent of the Hispanic population experience severe cost burden

A full description of housing problems in the jurisdiction and region can be found in the section "Disproportionate Housing Needs".

6. Contributing Factors of Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs

Consider the factors listed that are generally applicable to Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs and any other factors affecting the service area (and region, if applicable). Identify factors that significantly create, contribute to, perpetuate, or increase the severity of one or more fair housing issues. For each contributing

factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Generally Applicable Contributing Factors (Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs)

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of public and/or private investments in specific neighborhoods, including services or amenities
- Lack of access to opportunity due to high housing costs
- Land use and zoning laws
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Policies related to payment standards, FMR, and rent subsidies
- Private discrimination
- Source of income discrimination
- Other

General contributing factors for Segregation are: 1) *Community opposition*; 2) *displacement of residents due to economic factors*; and 3) *loss of affordable housing*

General contributing factors for R/ECAP tracts are: 1) *Community opposition*; 2) *location and type of affordable housing*; and 3) *displacement of residents due to economic pressure*

A full description of these contributing factors can be found in Sections “Segregation/Integration” and “Racially or Ethnically Concentrated Areas of Poverty”.

Additional Contributing Factors Related to Disparities in Access to Opportunity

- Access to financial services
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Impediments to portability
- Lack of job training programs
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Other

General contributing factors for Disparities in Access to Opportunity are: 1) *the availability, type, frequency, and reliability of public transportation*; 2) *location of employers*; 3) *location and type of affordable housing*; and 4) *location of proficient schools*

A full description of contributing factors can be found in “Disparities in Access to Opportunity”.

Additional Contributing Factors Related to Disproportionate Housing Needs

- **Availability of affordable units in a range of sizes**
- **Other**

General contributing factors for Disproportionate Housing Needs are: 1) *the availability of affordable units in a range of sizes*; 2) *displacement of residents due to economic pressures*; and 3) *land use and zoning laws*

A full description of contributing factors can be found in “Disproportionate Housing Needs”.

7. Publicly Supported Housing Section

Questions on the location and occupancy of the PHA’s publicly supported housing

a. Demographics

Provide demographic information, including protected class groups, on the residents of the PHA and compare these with the demographics of the service area (and region, if applicable).

In Lubbock there are two racial/ethnic groups that are more likely to be residing in publicly supported housing. The Black, non-Hispanic population makes up 7.2 percent of total households in the City but makes up 21.5 percent and 42.6 percent of the residents in different publicly supported housing programs. Approximately 26 percent of the total population identify as Hispanic but between 32 percent and 50 percent of residents in publicly supported housing. These two protected classes also have significantly lower access to opportunities in the service area.

A full description of location of publicly supported housing and race/ethnicity location can be found in “Publicly Supported Housing Analysis”.

b. Segregation and R/ECAPs

- i. Describe the location of the PHA’s properties in relation to areas of segregation and R/ECAPs in the service area.**

LHA maintains approximately 367 units throughout its jurisdiction. According to the HUD-provided data, public housing units are not available in R/ECAP tracts, but they are located near them. They are also in areas of relative segregation

A full description of location of publicly supported housing and race/ethnicity location can be found in “Publicly Supported Housing Analysis”.

ii. Describe the location of the PHA’s Housing Choice Vouchers in relation to areas of segregation and R/ECAPs in the service area (and region, if applicable).

LHA’s voucher program recipients live primarily outside R/ECAP tracts. Voucher recipients who are within R/ECAP tracts are more likely to be Hispanic than those outside of R/ECAP tracts. Voucher recipients are more common on the east side of Lubbock in areas of relatively high segregation.

A full description of location of publicly supported housing and race/ethnicity location can be found in “Publicly Supported Housing Analysis”.

iii. If there are R/ECAPs, describe any differences in the demographics, including by protected class group, of PHA assisted households who live in R/ECAPs versus those who live outside of R/ECAPs in the service area.

LHA assisted households that live in R/ECAPs are more likely to be Hispanic than in non-R/ECAP tracts. Residents in R/ECAP tracts are also more likely to be elderly or have a disability versus those that live in non-R/ECAP tracts.

iv. Describe the demographics, by protected class group, of each of the PHA’s publicly supported developments.

LHA manages four public housing developments, nine Project-based Section 8 locations and one multifamily assisted housing location. The following table displays the demographics of protected classes in the publicly supported developments.

Table: Demographics of LHA Supported Developments					
Development Name	White	Black	Hispanic	Asian	HHs with Children
Public Housing					
Cherry Point / 36 South	12%	43%	44%	N/a	75%
Behner Place / Mary Myers	20%	26%	53%	2%	49%
96 West	18%	40%	42%	N/a	76%
Park Meadows	7%	73%	20%	N/a	73%
Project Based Section 8					
High Plains Apartments	25%	16%	59%	N/a	82%
Homestead Apartments	80%	2%	17%	N/a	N/a
Parkview Place, Lubbock	84%	1%	14%	N/a	N/a
Silver Village	63%	4%	31%	1%	N/a
South Plains Apartments	22%	14%	63%	1%	63%
Cornerstone Homes Winwood	49%	35%	16%	N/a	80%
Casa Orlando	6%	27%	67%	N/a	69%
Castle Gardens / Cricket Ct	8%	45%	47%	N/a	85%
Garden Apartments	27%	35%	39%	N/a	82%

Multifamily Assisted Housing					
Courtyard At Kings Dominion	26%	23%	48%	2%	N/a
Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014, 2009-2013 ACS, Decennial Census. (HUD AFFHT0004, Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category)					

c. Disparities in Access to Opportunity

Describe any disparities in access to opportunity for residents of publicly supported housing in the service area (and region, if applicable), including within different program categories of publicly supported housing.

Areas with a concentration of publicly supported housing fall within the areas that have low Access to Low Poverty Neighborhoods. Residents in publicly supported housing are more likely to be in neighborhoods with higher rates of poverty and wealthier areas lack publicly supported housing. Additionally, most of the publicly supported housing developments are in areas with lower access to high performing schools. In particular, LIHTC and voucher recipients are in areas with high poverty and low performing schools.

A full description of location of publicly supported housing and race/ethnicity location can be found in “Publicly Supported Housing Analysis”.

d. Disproportionate Housing Needs

- i. Compare the demographics, including by protected class group, of the PHA’s assisted households to households in the service area with disproportionate housing needs in the service area (and region, if applicable).**

Black, non-Hispanic residents are significantly overrepresented in publicly supported housing. Approximately 8 percent of the population of Lubbock identifies as Black, but they make up 38.5 percent of Public Housing, 21.5 percent of Project-Based Section 8, and 22.2 percent of Other Multifamily. Hispanic families are also overrepresented in publicly supported housing. They make up 32 percent of the City’s population but 45 percent of Public Housing, 40.5 percent of Project-Based Section 8, and 49.2 percent of Other Multifamily.

Black, non-Hispanic and Hispanic households have disproportionate housing needs in Lubbock. Approximately 35.9 percent of the population has a housing problem but 48.3 percent of Black households and 42 percent of Hispanic families experience housing problems.

- ii. Compare the needs of families with children in the PHA’s service area (and region, if applicable) for housing units with two, and three or more bedrooms, with the PHA’s available stock of assisted units.**

In the City of Lubbock families with five or more people have a higher rate of living in a home with housing problems than smaller families. Approximately 3,645 large households (or 48.93 percent) face housing problems. To address this problem, it is important that publicly supported housing provide quality housing options that are large enough for families.

In Lubbock, 34.3 percent of all publicly supported housing units have 2 bedrooms and 31.4 percent of have 3+ bedrooms. In total, that is 1,357 multi-bedroom units provided for only 1,081 households with children. Larger units can still assist with larger families but there appears to be adequate housing.

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	68	19.65%	154	44.51%	119	34.39%	223	64.45%
Project-Based Section 8	261	35.41%	289	39.21%	179	24.29%	395	53.60%
Other Multifamily	65	100.00%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	313	32.30%	265	27.35%	351	36.22%	463	47.78%

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014 (HUD AFFHT0004, Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children)

e. Policies and Practices

Describe any policies and practices of the PHA and how they relate to fair housing choice including:

- Access for persons with disabilities (e.g., processing of reasonable accommodation requests, program access, and providing auxiliary aids and services necessary for effective communication)
- Admissions policies, preferences, and housing designations (including grounds for denial of admission, eviction, and subsidy termination)
- Affirmative marketing plan
- Comprehensive Community Revitalization Plans
- Meaningful access for persons with limited English proficiency (e.g., language assistance plans, interpretation assistance, and translation of vital documents)
- Voucher mobility and portability policies and practices

LHA is an equal access public housing authority. Persons who are disabled are given reasonable accommodation in the application process and services through the PHA. TTD/TTY communication is available for persons with hearing impairments and large-print or audio versions of key documents are available for persons with vision impairments.

Tenants of public housing units pay 30 percent of their income towards rent. PHA conducts a criminal background investigation and applicants must be able to have utilities connected to their name. An application may be denied if false information is provided.

LHA's 2018 Proposed Administrative Plan includes improving access to services for persons with limited English proficiency. Interpretation services will be provided free of charge and written documents can be translated.

For voucher mobility and portability, an eligible family that has been issued a housing choice voucher may use that voucher to lease a unit anywhere in the United States where there is a housing agency operating a housing choice voucher program. The ability to port out may depend on whether the receiving housing authority is absorbing or billing.

f. Questions on other categories of publicly supported housing

Describe other publicly supported housing programs, if any, in the PHA's service area. Identify the location by category of publicly supported housing in relation to areas of segregation and R/ECAPs and the demographics of the households of each category of publicly supported housing, by protected class in the service area (and region, if applicable).

In addition to the programs run by LHA, there are a variety of properties available that provide affordable housing. LHA lists 17 HUD Assisted and/or Tax Credit Properties in Lubbock. The target demographic for these properties is varied. Some accept all applicants, some only multifamily, and some elderly. These properties are located throughout the City but tend to be in or near R/ECAP tracts and areas of relatively high poverty. Many of these locations also have a disproportionately high Black, non-Hispanic and Hispanic population. Specific demographic data for these programs is not available.

g. Contributing Factors of Publicly Supported Housing

Consider the listed factors and any other factors affecting the service area and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- **Admissions and occupancy policies and procedures, including preferences in publicly supported housing**
- **Community opposition**
- **Displacement of residents due to economic pressures**
- **Impediments to mobility**
- **Impediments to portability**
- **Lack of access to opportunity due to high housing costs**

- Lack of meaningful language access
- Lack of local or regional cooperation
- Lack of public and/or private investment in specific neighborhoods, including services and amenities
- Land use and zoning laws
- Loss of affordable housing
- Occupancy codes and restrictions
- Policies related to payment standards, FMR, and rent subsidies
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

Contributing factors related to public housing are: *1) impediments to mobility and 2) lack of meaningful language access*

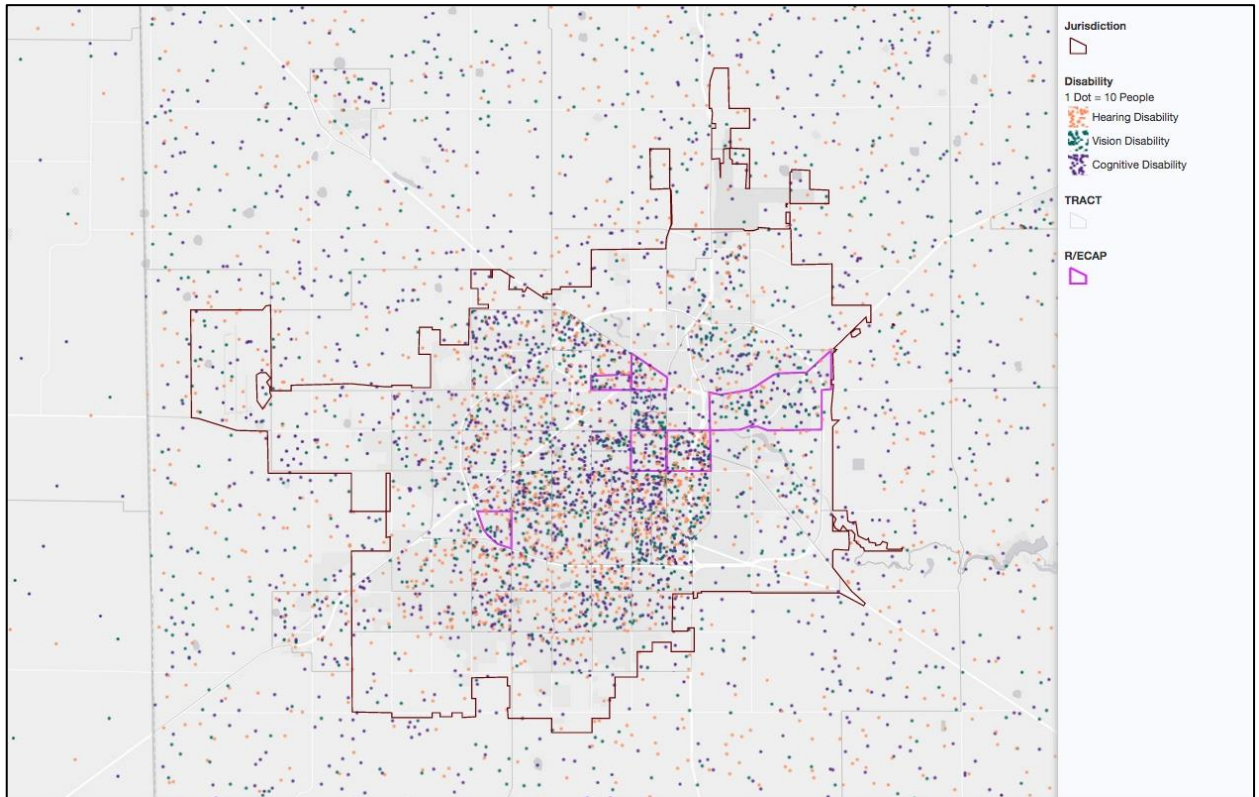
A full description of location of publicly supported housing and race/ethnicity location can be found in “Publicly Supported Housing Analysis.”

8. Disability and Access

- a. **Describe how persons with disabilities are geographically dispersed or concentrated in the PHA’s service area (and region, if applicable), including whether persons with disabilities reside in R/ECAPs and other segregated areas identified previously, and describe whether these geographic patterns vary for persons with each type of disability of persons with disabilities in different age ranges.**

There is no clear pattern in disability living patterns and R/ECAPs or areas of segregation in LHA’s service area for individuals with hearing, vision, and cognitive disabilities. There are residents with disabilities in each Census Tract, but concentrations appear to be areas with higher populations.

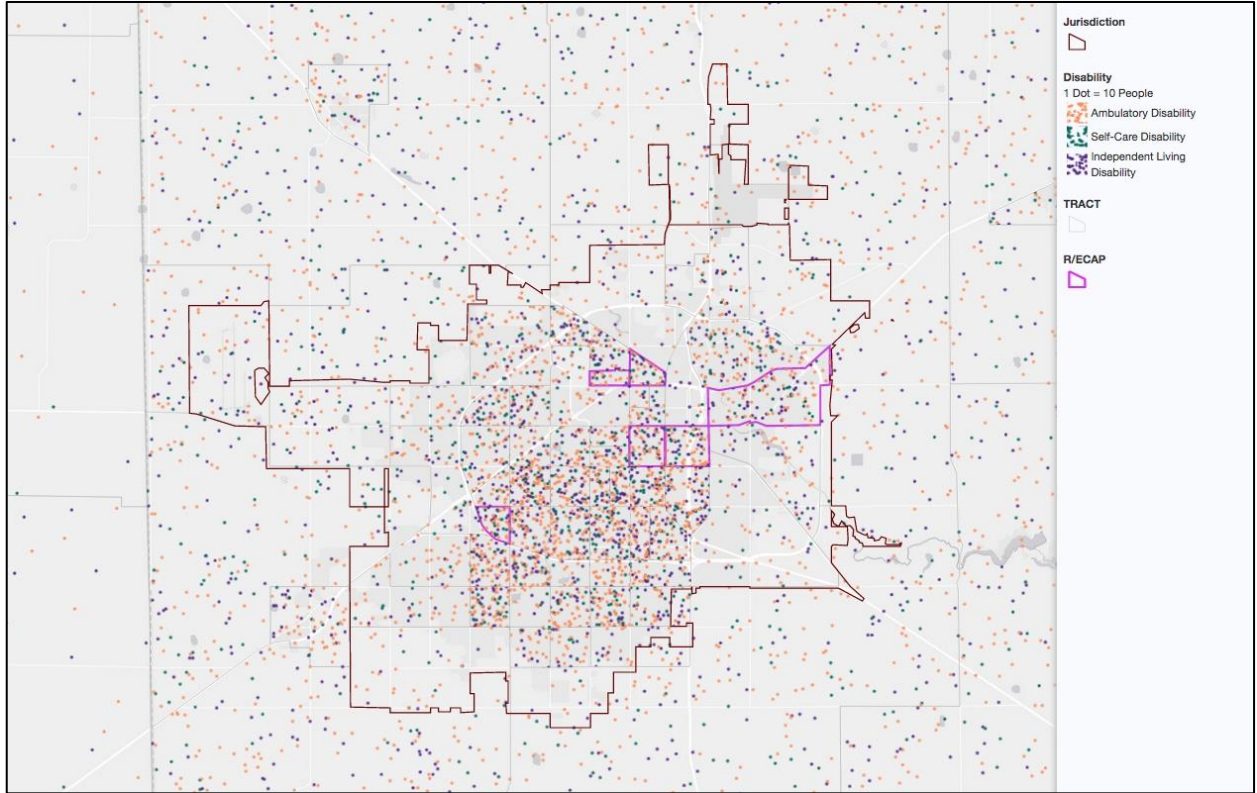
MAP: Disability by Type – Hearing, Vision and Cognitive



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

There is no clear pattern in disability living patterns and R/ECAPs or areas of segregation in the service area for individuals with ambulatory, self-care, or independent living disabilities. There are residents with disabilities in each Census Tract, but concentrations appear to be areas with higher populations.

MAP: Disability by Type – Ambulatory, Self-Care, and Independent Living



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

A full description of location of publicly supported housing and race/ethnicity location can be found in "Disability and Access Analysis."

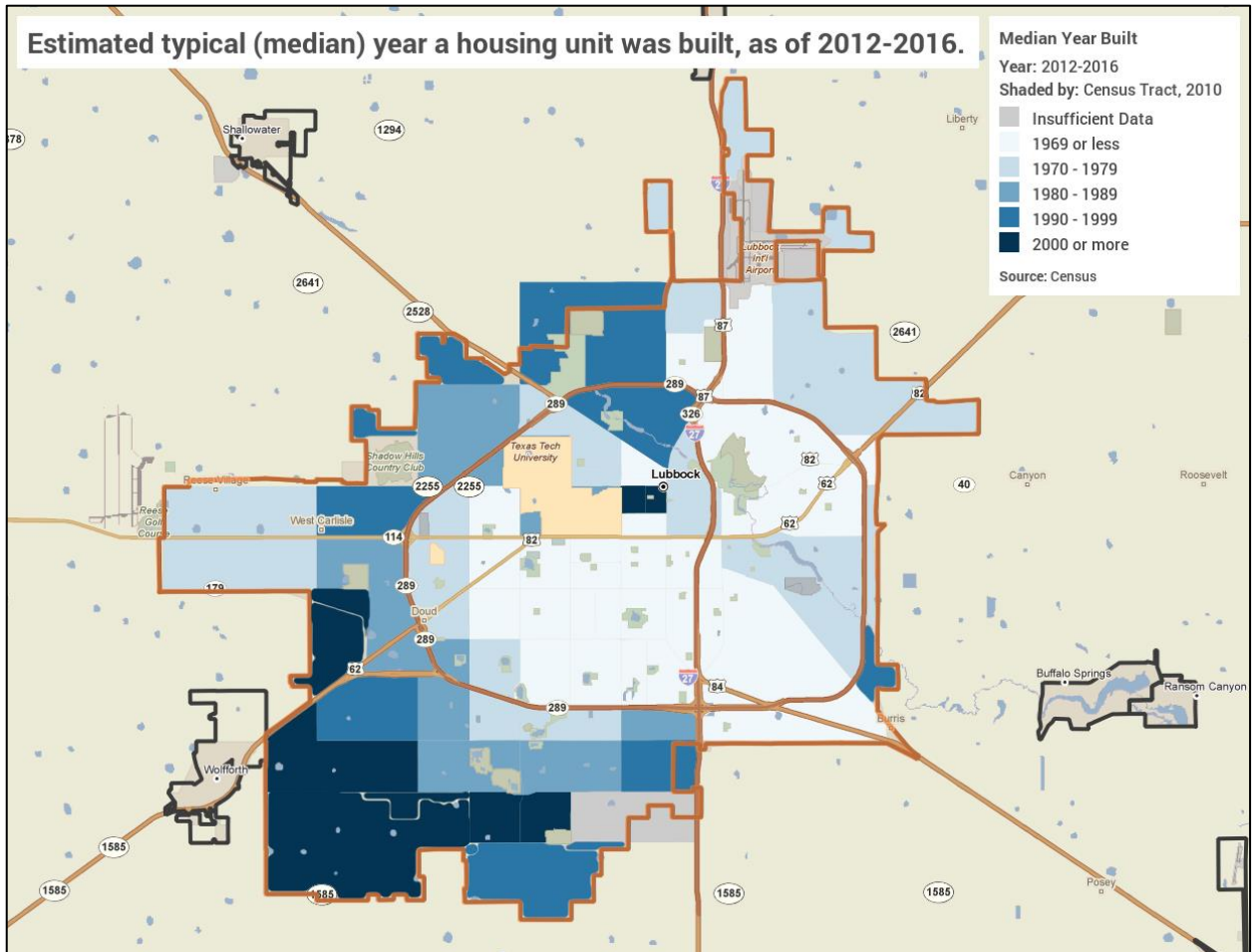
b. Describe whether the PHA's service area (and region, if applicable) has sufficient affordable, accessible housing in a range of unit sizes, describe the areas where affordable accessible housing units are located, and identify to what extent persons with different disabilities are able to access and live in the different categories of publicly supported housing.

Households spending more than 30 percent of income on housing costs are considered, by HUD's definition, to be cost burdened. According to the 2012-2016 ACS, 25.4 percent of homeowners and 54.5 percent of renters are housing cost burdened, pointing to a major disconnect between the housing supply and residents' income.

Persons with a disability in the service area face the added barrier of purchasing homes that must often be brought up to applicable jurisdiction or ADA codes, which will likely add to the cost of purchasing or owning a home. According to the 2012-2016 ACS, for working individuals, persons with a disability have a median income of \$17,465 in comparison to persons with no disability with \$23,804.

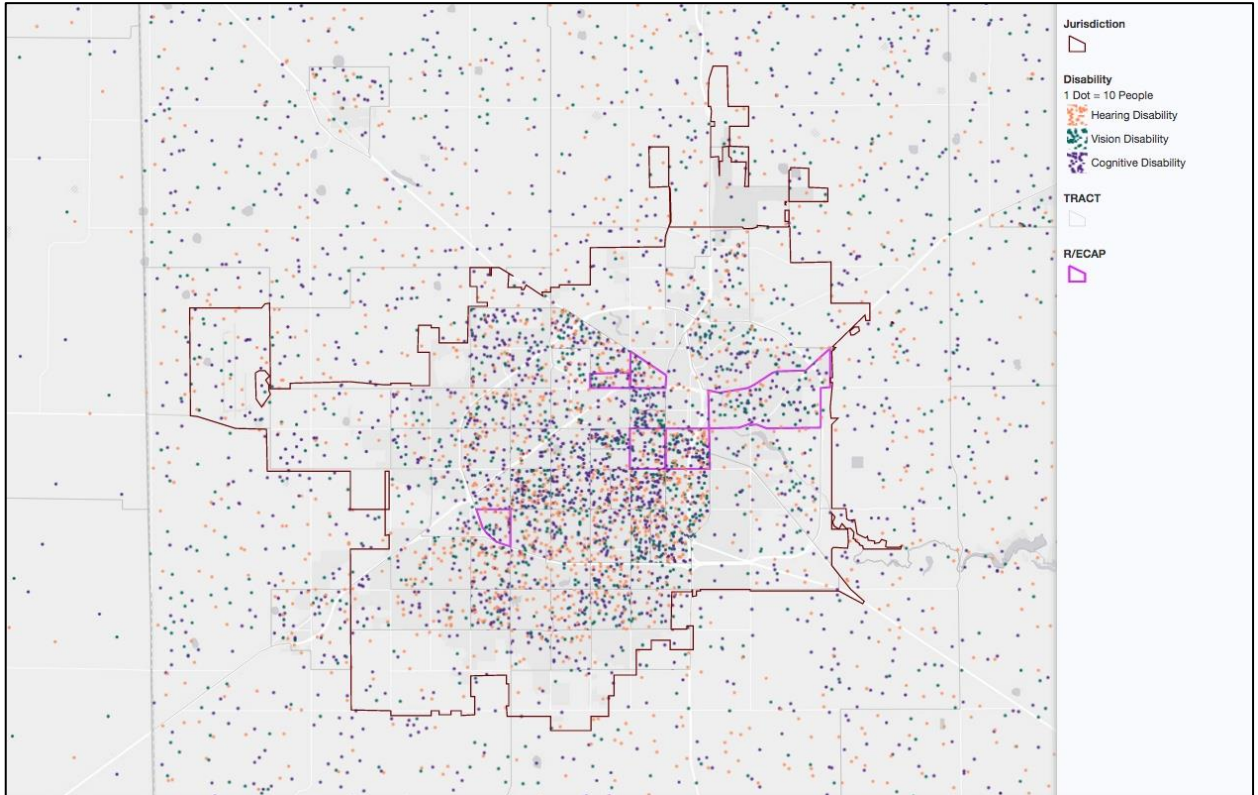
Accessible housing for disabled persons must accommodate for handicaps and also be affordable. The Fair Housing Act requires most multifamily properties built after 1991 to meet accessibility standards required by persons with a disability. Assuming compliance with federal law, it is generally accepted that multifamily housing built after this date meet the minimum level of accessibility. Though this is not a perfect indicator of accessibility, an analysis of the age of housing stock and its location can provide a picture of places where there are accessible units.

MAP: Median Year Built



Source: 2012-2016 ACS via PolicyMap

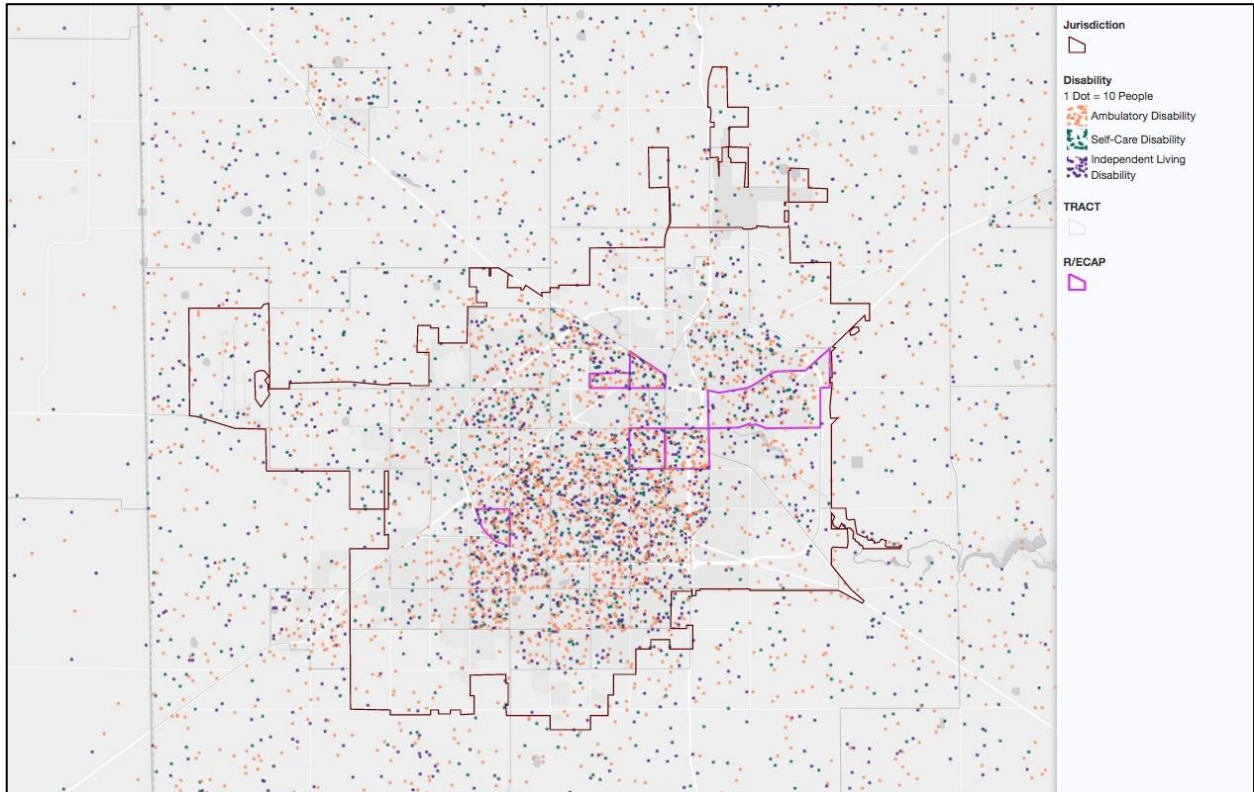
MAP: Disability by Type – Hearing, Vision and Cognitive



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

There is no clear pattern in disability living patterns and R/ECAPs or areas of segregation in Lubbock for individuals with ambulatory, self-care, or independent living disabilities. There are residents with disabilities in each Census Tract, but concentrations appear to be areas with higher populations.

MAP: Disability by Type – Ambulatory, Self-Care, and Independent Living



Source: 2009-2013 ACS, Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) (HUD AFFHT0004)

A full description of location of accessible and affordable housing in relation to disabled persons can be found in “Disability and Access Analysis.”

c. Contributing Factors of Disability and Access

Consider the listed factors and any other factors affecting the service area and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to disability and access, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Access to publicly supported housing for persons with disabilities
- Access for persons with disabilities to proficient schools
- Access to transportation for persons with disabilities

- **Admissions and occupancy policies and procedures including preferences in publicly supported housing**
- **Inaccessible public or private infrastructure**
- **Lack of access to opportunity due to high housing costs**
- **Lack of affordable, accessible housing in range of unit sizes**
- **Lack of affordable in-home or community-based supportive services;**
- **State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, and other integrated settings;**
- **Lack of affordable, integrated housing for individuals who need supportive services**
- **Lack of assistance for transitioning from institutional settings to integrated housing;**
- **Lack of public and/or private investment in specific neighborhoods including services and amenities**
- **Lack of local or regional cooperation**
- **Land use and zoning laws**
- **Location of accessible housing**
- **Laws, policies, regulatory barriers to providing housing and supportive services for persons with disabilities**
- **Siting selection policies, practices and decisions for publicly supported housing**
- **Source of income discrimination**
- **Other: Lack of assistance for housing accessibility modifications**

Contributing factors for issues of disabilities and access are: 1.) *lack of affordable, integrated housing for individuals who need support, 2) lack of affordable housing, and 3) access to publicly supported housing for persons with disabilities.*

A full description of contributing factors for disabled persons in relation to public housing can be found in "Disability and Access Analysis."

9. Fair Housing Enforcement

- a. Describe whether the PHA is currently the subject of any of the following:
- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
 - A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
 - Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
 - A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law; or
 - A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Currently, there are no outstanding fair housing complaints against the Lubbock Housing Authority.

b. Contributing Factors of Fair Housing Enforcement

Consider the listed factors and any other factors affecting the service area and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to fair housing enforcement, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Lack of local public and/or private fair housing outreach, and/or enforcement and/or resources
- Private discrimination and/or lack of fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

Contributing factors to Fair housing enforcement are: 1) *lack of local fair housing outreach and enforcement*, 2) *lack of local public fair housing enforcement*, and 3) *lack of local fair housing laws*

A full description of contributing factors of fair housing enforcement can be found in "Fair Housing Enforcement."

10. Additional PHA Information

The PHA may also describe other information relevant to its assessment of fair housing.

Unlike five other Texas jurisdictions (Austin, Corpus Christi, Dallas, Fort Worth, and Garland), there is no local public entity certified as a Fair Housing Assistance Program authorized to enforce

fair housing in Lubbock. The Texas Workforce Commission is a statewide resource that facilitates the resolution of fair housing complaints, provides information about anti-discrimination laws, and promotes equal housing opportunities.

Information about submitting a complaint is available at:

<http://www.twc.state.tx.us/partners/how-submit-housing-discrimination-complaint>

V. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.
2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Goal #1: Seek options for improving housing affordability for renters

INSERT SUMMARY

Goal #1	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measurement and Achievement	Responsible Program Participant(s)
Seek options for improving housing affordability for renters	Convert single family homes to rental by CHDOs; evaluate change in rental cost burden as new data becomes available; and partner with local apartment association to review tenant selection practices particularly for seniors and renters with delinquent accounts.	<ul style="list-style-type: none"> • Because of university populations, housing around the schools where there is often job opportunities is too high for low income workers because those living in a roommate situation look at price points differently than a family household • Renter cost burden increased to 55% from 44% since 2010. • Renters are often burdened by rental fees and penalties, and the use of Tenant Tracker by many landlords makes it difficult for delinquent renters to move beyond past difficulties. • Seniors are also affected by rental housing practices as many properties require two-months rent to move in and seniors on fixed incomes are unable to save to afford that cost. 	The availability of affordable units in a range of sizes	Short-Term	Converted Units; Housing Analysis in Con Plan; and MOU	CHRB & LHA; City CD; and Apartment Association

Goal #2: Improve transportation routes to provide access to greater employment opportunities

INSERT SUMMARY

Goal #2	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measurement and Achievement	Responsible Program Participant(s)
Improve transportation routes to provide access to greater employment opportunities	Do a comprehensive study of CitiBus routes with micro (smaller more efficient vehicles) focus on transit solutions -- funded by Texas Department of Transportation (TXDOT)	<ul style="list-style-type: none"> • There is a lack of affordable housing opportunities near areas that contain employment opportunities • Bus routes do not extend to parts of town experiencing development • Stakeholders reported that there are not enough accessible bus routes 	<p>Location of employers</p> <p>The availability, type, frequency, and reliability of public transportation</p> <p>Access to transportation for persons with disabilities</p>	Mid-Term	Completion of studies	CitiBus and TXDOT

Goal #3: Increase code enforcement and investment in older neighborhoods.

INSERT SUMMARY

Goal #3	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measurement and Achievement	Responsible Program Participant(s)
Increase code enforcement and investment in older neighborhoods	Increase code enforcement, including through demolitions and provide housing rehab to targeted to low -income areas <ul style="list-style-type: none"> • CDBG funds minor rehabs for homeowners – sustainability of property – elderly/ disabled • HOME major rehab for homeowners – sustainability of property 	<ul style="list-style-type: none"> • Residents in low income areas reported that neighborhood conditions have worsened while residents in higher income areas have reported improvements. 	Lack of public investment in specific neighborhoods, including services or amenities. Deteriorated and abandoned properties.	Short-Term	Complete 20 demolitions and 80 rehabs in low income areas annually	City Code Department; City CD

Goal #4: Improve financial literacy and access to financial services for lower income individuals and neighborhoods

INSERT SUMMARY

Goal #4	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measurement and Achievement	Responsible Program Participant(s)
<p>Improve financial literacy access to financial services for lower income individuals and neighborhoods.</p>	<p>Plan a coordinated approach for improving financial literacy and access to financial services.</p>	<ul style="list-style-type: none"> • East and North Lubbock do not have financial institutions to serve residents and many rely on pay day lenders. • While organizations offer financial literacy training to individuals seeking homeownership opportunities, not all individuals are ready for homeownership. • Employers of low income and young workers without bank accounts are using systems such as Netspend and GreenDot for paychecks resulting in a lack of credit history. 	<p>Access to financial services</p> <p>Lack of private investment in specific neighborhoods</p>	<p>Mid-Term</p>	<p>Prepare and implement strategy.</p>	<p>City CD; Homebuyer Counseling Agencies; and Financial Institutions</p>

Goal #5: Identify additional ways to connect persons with disabilities to accessible housing

INSERT SUMMARY

Goal #5	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measurement and Achievement	Responsible Program Participant(s)
Identify additional ways to connect persons with disabilities to accessible housing	Create new accessible units through CHDO; continue rehab of units to make them accessible for people with disabilities	<ul style="list-style-type: none"> • Stakeholders report that there are not enough units for disabled individuals • Senior population requires more accessible units and as the senior population grows the demand for these types of units increases. 	<p>Location of accessible housing</p> <p>Lack of assistance for housing accessibility modifications</p> <p>Lack of affordable, accessible housing in a range of unit sizes</p> <p>Access to publicly supported housing for persons with disabilities</p>	Short-Term	Complete 6 new accessible units in next two years; and complete 50 rehabs annually to address accessibility concerns	CityCD/CHDO

Goal #6: Increase public awareness of fair housing rights and improve opportunity for reporting concerns

INSERT SUMMARY

Goal #6	Strategy	Fair Housing Issues	Contributing Factors	Timeframe for Action	Measurement and Achievement	Responsible Program Participant(s)
Increase public awareness of fair housing rights and improve opportunity for reporting concerns	Contract with West Texas Legal Aide for services and collaborate with local apartment association	<ul style="list-style-type: none"> • Lubbock does not have a fair housing group so it's difficult for people to know where to go for help. • Generally there is a lack of information and services for people dealing with Fair Housing Concerns. From 2008-2017 only 47 housing complaints were filed. Disability was the most cited claim followed by race. 	<p>Lack of resources for fair housing agencies and organizations</p> <p>Lack of local private fair housing outreach and enforcement</p>	Short-Term	Establish the contract between the City and West Texas Legal Aid and consult with the Lubbock Apartment Association	City CD; West Texas Legal Aid; Lubbock Apartment Association