

**Texas City Housing Report Cards:**  
***Dallas 2006***

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## Introduction to the Report Card Series

*The 2006 Dallas Report Card* is the second in a series of report cards on Texas' largest cities.

### *Purpose of Report Card Series*

The series is intended to provide *accessible information* on how well cities in Texas are doing at meeting their affordable housing needs. We hope to provide a basis for informed local discussions about priorities, resources, and performance; allow for *cross-city comparisons and learning*; establish *benchmarks and goals* for improvement; and finally, give *recognition* to innovators.

This effort grew out of discussions in the Texas Housing Forum about the need to make housing a greater priority across the state. Participants in this broad-based coalition felt strongly that clearly presented, comparable information on housing needs and responses across the state would provide the basis for the type of informed policy discussions needed to focus attention on housing problems. While there is a wealth of data out there on housing needs, it is often presented in highly technical terms and can be difficult to understand for those not immersed in the jargon and minutia of the field. These report cards are intended to bridge that gap by presenting information in a format that is both accessible to the interested public and useful to policy makers and housing community stakeholders.

Our framework for grading cities highlights the central role of civic leadership in the provision of quality housing. Only through strong guidance from elected officials and from other civic leaders, will it be possible to raise public awareness of housing problems and build support for a coherent, sustainable response. Without the commitment and vision of leaders, little progress is likely to be made. All of the other outcomes we measure—resources, production, targeting, fair housing—will depend on this foundation. In this way, the report card differs from an audit of agency performance in implementing housing programs. It is about stepping back and considering the bigger picture: *What are our most pressing housing problems? What would it take for us to make a significant impact on these problems? How far are we from that path now?*

We hope that the Texas City Housing Report Card series will be used by local leaders to foster broader discussions of community housing needs and solutions, as well as to measure progress over time.

## Coming Up With Grades

We developed our framework for the Report Cards based on a review of three other models we found. These three models—the San Francisco Bay Area Housing Crisis Report Card, the Greater Boston Housing Report Card and the Toronto Report Card on Housing and Homelessness—took very different approaches to their task. Through a review of their reports and discussions with some of the authors, we assessed how their report cards were used, the data requirements involved in preparing them, and the audience they were addressing. Drawing on their experiences, we developed an approach that relies on existing data and grading standards that fit Texas.

Our grading system was developed in steps. We first identified the main areas where we thought progress should be measured:

1. **Leadership:** To what extent do city leaders make housing a spending and policy priority?
2. **Resources:** How strong is the local commitment to housing as demonstrated through available resources?
3. **Production:** On what scale are new affordable housing units being made available?
4. **Targeting:** How close is the match between housing needs and program priorities?
5. **Fair Housing:** How strong is the local commitment to improving access to housing throughout the community for groups that have historically faced discrimination?
6. **Transparency:** How accessible to the public and user-friendly is information on housing needs, programs and priorities?

We then put together lists of possible measures for each category and discussed these measures with experts and advocates. In order to make the process as feasible and fair as possible, three criteria were used to select measures. First, it must be feasible to document each item from data that is already reported to or required by HUD or other state or federal agencies, or reported publicly on a regular basis. Second, to the extent possible, measures should avoid judging the *quality* or *degree* of compliance of particular items. Third, to the extent possible, qualitative measures used should follow standards developed and in use elsewhere. Deciding what constitutes an “A” or an “F” again required discussions with stakeholders. Grading follows traditional standards, where a “C” is average, an “A” is exceptional and an “F” is utter failure to seriously address the issue at hand.

## Introduction: City of Dallas Report Card

According to the 2000 census, Dallas is the second largest city in Texas and the ninth largest in the nation. It has a diverse population and economic base. In 2000, while the city's population retained a slim white majority (50.8%), over one-quarter of residents were African-American and 35.6% were Hispanic. Like other Texas cities, Dallas continues to grow—adding 18% to its population between 1990 and 2000.<sup>1</sup> Yet despite continuing growth, the city ranks poorly against its national peers (including Philadelphia, Memphis and Indianapolis) in areas such as crime rate, educational achievement, and economic performance – issues that city leaders are actively working to address.<sup>2</sup>

<b>Leadership:</b>	<b>C+</b>
<b>Resources:</b>	<b>C+</b>
<b>Production:</b>	<b>D</b>
<b>Targeting:</b>	<b>C-</b>
<b>Fair Housing:</b>	<b>C</b>
<b>Transparency:</b>	<b>D</b>

Unfortunately, housing has not made this short list of key challenges facing the city. Despite commendable leadership from the housing authority, on the whole, Dallas leaders have not made the city's most critical housing needs a priority. Instead, discussion of housing in Dallas is generally framed exclusively as an economic development issue. Lack of commitment has undermined the development of the resources needed to confront housing problems: following recent scandals, use of federal tax credits was limited by ordinance to housing for the elderly or disabled.<sup>3</sup> Limiting use of this critical resource compounds the ongoing decline in federal resources for housing. Thus, in a high-growth city, housing resources are declining and production is limited.

Yet, housing needs remain high. More than 55,000 Dallas renter households (22%) paid more than half of their monthly gross income for housing costs in 2000.<sup>21</sup> However, spending priorities do not mirror these critical needs. Only a small portion of available resources are dedicated to providing affordable homes for renters—most resources are focused instead on homeownership at prices beyond the reach of most renters. In addition, little effort is being made to counter long term patterns of economic and racial segregation by locating affordable housing outside of predominantly low-income and/or minority neighborhoods.<sup>39</sup> The city of Dallas has failed to develop a strategy for addressing local fair housing issues: its most recent fair housing plan is seven years old and of poor quality. The only affirmative steps we observed were mandated by the settlement reached in *Walker v. HUD*, which required the housing authority to provide homes for 3,205 families in predominantly white areas of Dallas and its suburbs.<sup>4</sup>

This initial Dallas Housing Report Card assesses needs and progress in six areas: Leadership, Resources, Production, Targeting, Fair Housing and Transparency. Overall, our findings indicate that serious challenges lie ahead—challenges that will only be met with the support of strong leadership, willing to raise the resources needed to meet housing needs. In addition, leaders need to ensure that resources target the city's most critical needs and that they aim to provide housing opportunities for residents throughout the city.

## Dallas' Grades:

### Leadership:

Cities are graded on the level of leadership provided by local elected officials and community leaders. Meaningful leadership will be critical to a city's ability to make housing a real policy priority, as reflected in the city's budget, in the staff devoted to housing programs and in attention to progress over time. To assign grades, the following criteria are considered:

- The Mayor takes leadership by proposing and championing housing initiatives for the city.
- The City Manager ensures that housing initiatives are well coordinated by placing them all under the supervision of one assistant city manager.
- City relies on general revenue to support at least 20% of its housing-related full time staff, thus freeing up federal funds for programming.
- City resources are allocated in the context of the overall budget picture for housing (both local and non-local funds), compensating for declines in important funds allocated by the federal or state governments, as needed.
- Community leaders put forward a focused agenda for housing and track progress over time.

#### **GRADING CRITERIA:**

<b>A</b>	<b>=</b>	<b>All criteria are met</b>
<b>B</b>	<b>=</b>	<b>Four criteria are met, including tracking the community's housing agenda over time</b>
<b>C</b>	<b>=</b>	<b>Two to three criteria are met</b>
<b>D</b>	<b>=</b>	<b>Only one criterion met</b>
<b>F</b>	<b>=</b>	<b>None of the criteria are met</b>

### **Dallas' score on leadership: C+**

#### *Explanation:*

An August 2002 report on Affordable Workforce Housing noted that support for affordable housing among city council members was at an historic low. This places a premium on leadership from the mayor and community leaders. Yet, despite signs of progress, the Mayor has not become a consistent advocate for housing needs. Instead, evidence suggests that she has been reluctant to use the tools at her disposal to increase attention to housing needs and increase the effectiveness of city policies and programs. Community leaders have made some progress in documenting and articulating housing needs and championing solutions; however, these efforts are not yet institutionalized. Most promising are the ongoing efforts to implement the recommendations of the 2002 Mayor's Affordable Housing Task Force on Workforce Housing.

*Criteria met:*

- ✓ *Affordable Workforce Housing Taskforce sets an agenda, tracks it over time:* The 2002 task force report laid out recommendations for improvement to city programs. A 2004 report assessed progress toward these changes.<sup>10</sup>
- ✓ *Housing programs overseen by the same city manager:* In the city manager's office, the departments with primary responsibility for housing (Housing, Fair Housing, and Development Services) are under the same assistant city manager.<sup>8</sup>

*Mixed results:*

- ✓ *Mayoral leadership on housing:* Mayor Miller's track record on affordable housing has been mixed and more often reactive than forward looking. On the positive side, she formed two mayoral housing taskforces during her tenure, and championed passage of city general obligation bonds for the downtown Homeless Assistance Center.<sup>11</sup> She led efforts to raise and direct private funds to temporarily house Katrina evacuees.<sup>11</sup> However, she has also been an opponent of construction of multifamily rental housing, and froze use of the most effective source of funding for affordable rental housing (federal tax credits) following a funding scandal.<sup>12</sup>
- ✓ *Budget oversight improves.* Since 2001, the Housing Department has improved its record for expending available funds for housing, carrying over proportionally less of its block grant funds than in the past. Nonetheless, federal sources of funding for affordable housing, which target the lowest income groups, have been declining in recent years. Recent decisions to reduce use of the federal LIHTC, reinforce rather than counter this decline.<sup>14</sup>

*Criteria not met:*

- ✓ *Overwhelming reliance on federal funds for staff positions:* The city's Housing Department is responsible for affordable housing initiatives. The department has 68.5 full time positions. The 2003-04 adopted budget listed 15 full time positions in the housing department supported with general revenue funds.<sup>13</sup>

## Resources:

Cities are graded on their success in dedicating local resources to housing needs. Local resources are important because they give cities greater flexibility in shaping programs to address local needs; in addition, local resources can partly compensate for the long term decline in federal resources for housing. To assign grades, the following factors are considered:

- City has established a dedicated revenue source for local housing programs.
- City has generated revenue for housing production through local bond elections in the past three years.
- City has allocated general revenue to housing production or vouchers over the past three years.
- City uses fee waivers or other incentives to facilitate affordable housing production.
- City or local partners fund capacity building for Community Housing Development Organizations (CHDOs).

### GRADING CRITERIA:

<b>A</b>	<b>=</b>	<b>All criteria met</b>
<b>B</b>	<b>=</b>	<b>At least 3 of 5 criteria met, including dedicated revenue source for local programs</b>
<b>C</b>	<b>=</b>	<b>Two criteria met</b>
<b>D</b>	<b>=</b>	<b>At least one criterion met</b>
<b>F</b>	<b>=</b>	<b>No local funding directed to housing in recent years</b>

## Dallas' score on resources: C+

### *Explanation:*

Federal resources flowing to the city are declining. Local funding is minimal, and does not directly flow toward housing production for low-income families. Bond funding has been spent on infrastructure improvements and land acquisition rather than direct production. The city's housing trust fund was established with only \$1 million six years ago, and has received no additional funding from the city. Dallas also has significantly reduced the amount of federal funds dedicated to supporting CHDOs. The overall picture is one of decline, with periodic infusions of bond dollars unable to counter the overall trend.

*Criteria met:*

- ✓ *Bond funds allocated to housing in 2003 and 2005:* The city's most recent general obligation bond election was held in 2005; bonds for a new, downtown Homeless Assistance Center were passed. In 2003, bonds supporting land acquisition for the development of low and moderate income, owner-occupied, single family homes passed with over 68% of the vote.<sup>15</sup> According to the 2004-2005 Consolidated Annual Performance and Evaluation Report (CAPER), \$1,112,900 from the 2003 bond was spent on "infrastructure development of single family homes for mixed income families including low to moderate income" during FY 2004-05.<sup>16</sup>
- ✓ *The city rebates development fees if affordable housing is produced:* The city allocates \$500,000 of TIF district funds annually to rebate developer fees. During FY 2004-2005, only \$151,689 of this funding was spent.<sup>18</sup>

*Mixed Results:*

- ✓ *City uses HOME funds to support CHDOs, but the amount allocated to this purpose has declined:* In FY04, the city allocated \$2,074,848 in funding to support CHDOs. This level of funding has been reduced to only \$1,687,255 – a reduction of 18.6%.<sup>17</sup>

*Criteria not met:*

- ✓ *Lack of a dedicated funding source for housing:* A housing trust fund was created with \$1,000,000 in FY 2000-2001, but has not received any additional revenue since.<sup>19</sup> According to the CAPER, \$40,749 was expended in this program during FY2004-2005. This is an entirely inconsequential sum for a city the size of Dallas.
- ✓ *City does not allocate general revenue to housing production or vouchers:* While the city does allocate some general revenue funding to housing related programs, such as the Walker Distress Fund and mortgage assistance programs<sup>20</sup>, the city does not appear to directly fund housing production or voucher programs from general revenue.

## Production:

Cities are graded on their success in spurring production of new affordable housing units, preserving existing units and/or giving residents access to market housing through vouchers. For most cities, there is a considerable shortage of units affordable to low and moderate income residents. The following factors are considered in assigning grades:

- Current rate of production of new low/moderate income housing units (including LIHTC units) would allow the current backlog needed to house those paying more of 50% of their income to be addressed over the next 20 years.
- Current rate of rehabilitation or repair of substandard units would allow backlog to be addressed over the next 20 years.
- At least 500 units are produced per year through the Low Income Housing Tax Credit program
- New housing vouchers have been added to the stock since 2000
- No net loss of public housing units since 2000

### GRADING CRITERIA:

<b>A</b>	<b>=</b>	<b>All criteria addressed</b>
<b>B</b>	<b>=</b>	<b>4 of 5 met, including Low Income Housing Tax Credit target</b>
<b>C</b>	<b>=</b>	<b>2 or 3 criteria met</b>
<b>D</b>	<b>=</b>	<b>At least one criterion met</b>
<b>F</b>	<b>=</b>	<b>None of the criteria met</b>

## Dallas' score on production: D

### *Explanation:*

The pace of production of affordable housing in Dallas lags far behind that needed to address the needs of city residents. Moreover, recent production efforts have focused on the creation of homes for sale. In sum, moderate- and low-income renter households in Dallas have few affordable options with comparatively little activity on the horizon. More than 55,000 Dallas renter households paid more than half of their gross monthly income for rent and utilities in 2000. In addition, 20,100 households lacked complete kitchen facilities and 9,000 households lacked complete plumbing in 2002. Based on data reported for 1999-2005, at the current level of activity, it would take more than 32 years for this shortage in units to be addressed and 36 years for units lacking complete kitchens to be repaired. Most production was supported by federal tax credits until late 2005 when the city restricted its use of tax credits to housing for elderly or disabled residents. HUD has added vouchers to the city's stock of 11,000 in response to a court order under the Walker Settlement.

*Criteria met:*

- ✓ *Low Income Housing Tax Credit (LIHTC) Production:* Since 2000, an average of 690 affordable rental housing units per year has been added with support from the federal Low Income Housing Tax Credit Program. (Total units approved through July of 2005 were 3,451.)<sup>30</sup> However, a moratorium on tax credit projects was initiated by the mayor, following a funding scandal, in August of 2005. The city council subsequently passed an ordinance limiting the use of tax credits to housing for elderly or disabled residents.<sup>24</sup>

*Mixed results:*

- ✓ *Only vouchers added due to Walker settlement:* The Section 8 voucher waiting list wait list is now closed, and has been since June 2004. At that time, DHA reported serving 16,415 people with vouchers.<sup>27</sup> However, this includes 3,025 additional vouchers added by HUD in March of 2001 as part of the Walker settlement.<sup>26</sup>

*Criteria not met:*

- ✓ *Rate of production inadequate:* Between FY 1999-2000 and FY 2004-05, a total of 6,606 units were added to the stock of affordable housing in the city as reported in the city's housing department performance report (including single-family and multi-family). An additional 3,798 were added using LIHTC (1999-2005). Assuming no overlap between units produced with CDBG/HOME and LIHTC, the maximum number produced was 10,404 or 1,734 per year. At this rate, it would take over 32 years to address the needs of households paying more than half their income for housing.<sup>23</sup>
- ✓ *Rate of rehabilitation inadequate:* Between 1999 and 2005 a total of 3,282 single-family homes were repaired/rehabilitated, an annual rate of 547.<sup>22</sup> At this rate, it would take over 32 years to rehab the units lacking kitchens alone. During that same time period, preservation activity of existing multi-family housing only included 415 units, with no preservation reportedly funded for the past two years.<sup>28</sup>
- ✓ *Net loss of public housing units:* Dallas Housing Authority reports maintaining close to 4,800 public housing units in more than 2 dozen developments. As of 2005, the DHA HOPE VI inventory (Lakewest, Roseland, and Frazier Homes) included 1,043 units with an additional 683 planned through 2008 for an estimated total of 1,726. However, those three developments originally comprised 3,500 public housing units—for an overall loss of at least 1,774 units.<sup>31</sup> This does not take into account the condition of the public housing units, or whether they were occupied prior to the HOPE VI revitalization, thus the loss of units suitable for residence may be somewhat less.

## Targeting:

Cities are graded on their ability to set priorities for the use of scarce funding. Often, they are faced with needs that far exceed existing resources and must address competing priorities. The Consolidated Plan should lay out the process for assessing needs and setting priorities. Program rules should fit local market conditions. Consistent across cities is the severity of the needs of the lowest income households—and the high costs (relative to other groups) of addressing them. The following factors are considered in awarding grades:

- Consolidated Plan clearly lays out priorities based on analysis of HUD data.
- Share of rental units, produced with HOME funds, that is affordable to extremely low income renters (below 30% of median income) meets or exceeds national average of 42%.
- Share of rental units, produced with HOME funds, that is affordable to very low-income renters (below 50% of median income) meets or exceeds national average of 75%.
- Program rents do not exceed HUD's fair market rents for the region.
- Homeownership programs target those excluded by mainstream market, include counseling.

### **GRADING CRITERIA:**

<b>A</b>	<b>=</b>	<b>All criteria addressed</b>
<b>B</b>	<b>=</b>	<b>Three criteria addressed, including well supported priorities laid out in the Consolidated plan</b>
<b>C</b>	<b>=</b>	<b>Addresses only two criteria and/or produces excessive program rents</b>
<b>D</b>	<b>=</b>	<b>Addresses only one criterion</b>
<b>F</b>	<b>=</b>	<b>Addresses none of the criteria</b>

## **Dallas' grade on targeting: C-**

### *Explanation:*

The city's Consolidated Plan provides a clear picture of areas of need. Yet spending priorities do not track the trends reported in the data. With the exception of 2005, for all years examined, Dallas consistently focused on homeownership rather than rental housing, and did not prioritize the needs of the lowest income renter households. While receiving disproportionate funding, programs for homeowners do appear to be appropriately targeted, serving low income homeowners unlikely to be served by private mortgage lenders. As detailed below, support for low- to moderate-income renters is practically non-existent by comparison.

*Criteria met:*

- ✓ *Program rents are affordable to renter households:* Program rents affordable to a family of 4 at 50% of 2004 regional median family income (or \$31,575) can be as high as \$748 per month. This falls below HUD's 2004 fair market rent of \$871 for a 2 bedroom apartment. It also compares favorably to what the median renter households can afford: \$890 in 2004.<sup>34</sup>
- ✓ *Homeownership programs well targeted:* Between 2001 and 2005, first time homebuyer programs focused on households between 50-80% of median family income. In contrast, rehab programs for homeowners focused on lower income owner households, those below 50% of median family income. Moreover, for each year examined, more than half of funds for home repair were targeted to owner households with less than 30% MFI. Though funding was consistently devoted to mortgage assistance, for all years examined that funding targeted more units for homeowner repair than for mortgage assistance.<sup>35</sup>

*Criteria not met:*

- ✓ *Share of HOME funds targeted to extremely low income renters falls below national average of 42%:* 35% of HOME funds used for rental housing were targeted to this group.<sup>37</sup> This allocation placed Dallas above the state average of 32%, but well below the national benchmark. Extremely low income households earned \$31,991 or less in 2004 for a four person household.<sup>35</sup>
- ✓ *Share of HOME funds targeted to very low income renters fall below national average of 75%:* While over 71 percent of these funds were targeted to this group, (those earning \$34,838 for a family of four in 2004), this fell below the average achieved by cities nationally.<sup>36</sup>
- ✓ *Consolidated Plan priorities not adequately supported by analysis:* As noted above, the city's Consolidated Plan provides a "needs assessment" which is largely ignored with respect to renters. According the CAPER, the majority of HOME funds used to assist homeowners and homebuyers was targeted to households below 60% MFI. Assistance for renter households in that income category was virtually non-existent.<sup>38</sup>

## Fair Housing

Cities are graded on their commitment to ensuring that barriers to renting or owning a home that have historically faced residents, due to discrimination based on their race, ethnicity or disability are being removed. The following factors are considered in awarding grades:

- ✓ Most recent Impediments to Fair Housing Study, required by HUD, is available on the city web site.
- ✓ Study's Action Plan addresses impediments identified in study.
- ✓ Housing Choice Voucher program proactive in recruitment of landlords, counseling of vouchers holders to encourage use in non-minority neighborhoods.
- ✓ Affordable housing programs give residents access to housing throughout the city.
- ✓ Accessibility requirements incorporated into local housing programs.
- ✓ Evidence of enforcement of Fair Housing Laws through local organizations.

<b>GRADING CRITERIA:</b>		
<b>A</b>	<b>=</b>	<b>Addresses all criteria</b>
<b>B</b>	<b>=</b>	<b>At least 4 criteria met, including evidence of enforcement</b>
<b>C</b>	<b>=</b>	<b>Two or three criteria met</b>
<b>D</b>	<b>=</b>	<b>At least one criterion met</b>
<b>F</b>	<b>=</b>	<b>None of criteria met</b>

### **Dallas' score on fair housing: C**

#### *Explanation:*

Despite some improvement over the past few decades, Dallas remains highly segregated by race and ethnicity, with only Whites and Asians not highly segregated from each other. As of 2000, minority households in Dallas were predominantly concentrated in the Northwest, Southwest and Southeast of the city, with white households predominantly concentrated in the North Central and Northeast portions of the city. The City is currently conducting its first study of impediments to fair housing since 1998 (August 2006) —well beyond the 2-5 year window recommended by HUD. The 1998 study provided little useful information on the obstacles facing residents, and lacked any analysis of the impact of city policies or programs on fair housing conditions. Finally, the report offers little guidance for city action to improve conditions. Since that time, Dallas was the subject of one of the most famous housing discrimination cases in history – Walker v. HUD. Much of the progress that has been made in Dallas has been a direct result of court-ordered action based on the settlement reached in this case. The Dallas Housing Authority has played the strongest role in this process. The city's Fair Housing Office, established as a result of the Walker Case, has built a strong track record in investigating Fair Housing Complaints.

### *Criteria Met*

- ✓ *Evidence of Fair Housing Enforcement:* Following the conditions laid out in the settlement of the Walker v. HUD housing discrimination case, the Dallas Housing Authority has completed the required construction of units in order to balance the public housing stock to better represent the city's demographics.<sup>4</sup> In addition, the settlement established the city's Fair Housing Office, which had a budget of \$550,000 in 2005-2006.<sup>41</sup> The FHO actively investigates and helps resolve fair housing complaints: for 2003-04, 157 were filed and investigated, 63 cases closed and 17 cases conciliated; for 2004-05 95 were filed and investigated, 73 cases closed and 23 conciliated and one "cause case" was settled. In addition, FHO audited 53 multi-family government-assisted developments and monitored 40 affirmative fair housing marketing plans for these developments.<sup>41</sup>
- ✓ *City adopts international accessibility standards:* According to the fair housing report, building code standards were outdated and did not include mention of all protected groups. Furthermore, occupancy standards were not consistent with fair housing laws. However, in 2004 the city adopted the international code series, which does comply with FHA requirements for protected populations.<sup>48</sup>

### *Mixed Results*

- ✓ *Voucher holders live outside of poor areas but still concentrated in minority neighborhoods:* According to the city's 1998 fair housing report, the housing authority actively works to recruit landlords into the Section 8 program. Based on the numbers, it does appear that the Section 8 voucher program is used by recipients to find housing outside of low-income areas. Only 13% of voucher holders reside in low-income census tracts. However, 73% of voucher holders reside in tracts with a higher than average percentage of African-Americans, and 47% reside in tracts with a higher than average percentage of Hispanic households. Voucher holders are overwhelmingly minority: only 6% were white in 2000, and there is little evidence that the city steers voucher holders to predominantly white neighborhoods.<sup>45</sup>

### *Criteria not met:*

- ✓ *Location of affordable housing is primarily in minority neighborhoods:* Overall, the current stock of affordable housing available to Dallas residents, whether through physical units or through vouchers for use in the private market, shows that opportunities are concentrated in neighborhoods where minority groups are overrepresented relative to city averages.<sup>45</sup> Despite recent improvements, 89% of the existing stock of affordable housing units is found in census tracts where African Americans are overrepresented; 42% stands in census tracts where Hispanics are overrepresented.<sup>44</sup> The highest degree of dispersion was found for public housing residents and holders of housing vouchers (see above.) See the Dallas map library on our website for details. [insert URL.] Much of this

dispersion is a direct result of court-ordered production as a result of the Walker settlement.<sup>4</sup>

- ✓ *City's Analysis of Impediments to Fair Housing is inadequate:* The most recent study available is from 1998, and is not available online. The majority of the impediments identified include trivial items related to changes in the language of the building codes.<sup>42</sup> No critical analysis of the city's own housing or development policies or programs is included. Furthermore, there is no follow up to the identified impediments in the most recent comprehensive plan.
- ✓ *Study's Action Plan is inadequate:* The Action Plan included in the Impediments to Fair Housing study is one page in length. The action items address four impediments, none of which are related to those identified in the study. New action items focus on increasing awareness of fair housing issues among housing providers and consumers, rather than on changes to bureaucratic or regulatory policies or to practices that improve housing fairness.<sup>43</sup>

## Transparency:

Cities are graded on the degree to which they provide accessible information on housing needs, on locally administered programs, and on program priorities and performance. To assign grades, the following factors are considered:

- Current Consolidated Plan is available on city website, and in local libraries.
- City's most recent Consolidated Annual Performance Evaluation Report (CAPER) available on city website.
- Audits of city agencies posted on website.
- Consolidated Plan clearly lays out priorities based on analysis of HUD data.
- City provides program information and contact information on website.
- City provides information and referrals by telephone or in person.
- City housing program information is available in Spanish.
- The Housing Authority's most recent annual plan is available on its website.

### GRADING CRITERIA:

<b>A</b>	<b>=</b>	<b>All criteria are met</b>
<b>B</b>	<b>=</b>	<b>At least five criteria met, including bilingual information/referrals</b>
<b>C</b>	<b>=</b>	<b>Between two and four criteria met, and/or no bilingual information</b>
<b>D</b>	<b>=</b>	<b>Only one criterion met</b>
<b>F</b>	<b>=</b>	<b>No website, or no planning carried out</b>

## Dallas' score on transparency: D

### *Explanation:*

Dallas is doing a poor job of providing information on programs to residents. Those needing services would be hard pressed to learn about them from city websites. Improvement is desperately needed in making documents that present information on funding priorities and on program performance accessible to the interested public. We were able to obtain such documents only after repeated requests. In some cases, we had to travel to City Hall to view the information. Interested members of the public would be able to learn very little about funding sources, program priorities or performance by visiting the city's website.

### *Criteria met:*

- ✓ *Agency Audits:* The most recent audit of the Housing Authority's Hope IV program is available at <http://www.hud.gov/oig/ig961001.pdf>. The internal review of the City of Dallas Housing Department Award and Administering Controls from September 2, 2005 can be found at [http://www.dallascityhall.com/html/2005\\_audit\\_reports.html](http://www.dallascityhall.com/html/2005_audit_reports.html).

*Mixed results:*

- ✓ *Consolidated Plan plan priorities clear, but not supported by analysis of HUD data.* The Consolidated Plan includes a table laying out the number of households needing housing and setting priority levels for renters and homeowners by income level. However, this data appears disconnected from the funding priorities included at the bottom. (See earlier discussion in targeting section.) However, since the consolidated plan is not readily available, this information cannot be said to be accessible.<sup>49</sup>
- ✓ *Program information and referrals:* Program information and contact information is available on the website of the Housing department. Contact names and telephone numbers are provided.<sup>50</sup> However, this information is clearly directed to housing producers: consumers would be hard pressed to find out what services might meet their needs, and how to access them from the information posted. <http://www.dallascityhall.com/html/housing.html> (Accessed 6/9/06)
- ✓ *Assistance in Spanish:* Spanish speakers will have a hard time learning of services available through the city from city websites. If they somehow discover where to call, there are several people in the housing department that can help them--although they only offer consultation concerning home repairs and the homebuyer program.<sup>51</sup> Similarly, the Dallas Housing Authority's (DHA) website is not available in Spanish; however Spanish speaking callers can be assisted. <http://www.dallashousing.org/>

*Criteria not met:*

- ✓ *Consolidated Plan not available online:* The Consolidated Plan is not available online, and could not be acquired through library services; however it was available upon request through the city.<sup>49</sup>
- ✓ *Performance information not available online, difficult to obtain hard copy:* The CAPER is not available on city websites. After several requests by phone and email, we were forced to visit the office in order to view the document and select portions to copy. These were then copied for us. Requests for a complete copy to be sent by mail were refused.<sup>54</sup>
- ✓ *Housing Authority Plan:* The Dallas PHA has not posted its 2005-2009 plan on its website.<sup>52</sup> It is available, however, on HUD's website: <http://www.hud.gov/offices/pih/pha/approved/pdf/05/tx009v02.pdf>

## Dallas 2006 Housing Report Card: Supporting Materials

### Introduction

1. All demographic data obtained from the US Census Bureau:  
<http://www.census.gov/>
2. A Dallas Morning News Study, "Dallas at the Tipping Point" compared the city on a number of indicators to other large cities, including Detroit, Baltimore, Philadelphia, Houston, San Antonio, Memphis, Indianapolis, and others. The study can be accessed at the following website:  
<http://www.dallasnews.com/s/dws/spe/2004/dallas/dallas.html>
3. Most production was supported by federal tax credits until August of 2005 when the city declared a moratorium on the use of tax credits. Ramshaw, E. 2005. *Miller halts tax-credit use*. Dallas Morning News, August 30, 2005. Accessed online Feb 9, 2006:  
<http://www.dallasnews.com/sharedcontent/dws/news/longterm/stories/071305dnmetnotaxcredit.11ccc0b.html>
4. As part of the landmark Walker desegregation litigation, in 1995 U.S. District Court Judge Jerry Buchmeyer ordered the housing agency to provide homes for 3,205 families in predominantly white areas of Dallas and its suburbs, 474 of them in new homes.( National Low Income Housing Coalition NIMBY Report: <http://www.nlihc.org/nimby/042005.htm>) A case law summary of Walker v. HUD is accessible at: <http://caselaw.lp.findlaw.com/data2/circs/5th/0410946p.pdf>
5. For more information on fair housing litigation see Roisman, Florence Wagman, *Long Overdue: Desegregation Litigation and Next Steps To End Discrimination and Segregation in the Public Housing and Section 8 Existing Housing Programs* Cityscape: A Journal of Policy Development and Research • Volume 4, Number 3 • 1999 Cityscape 171 U.S. Department of Housing and Urban Development • Office of Policy Development and Research  
<http://www.huduser.org/periodicals/cityscpe/vol4num3/roisman.pdf>
6. Dallas Housing Authority comes through in time of crisis:  
<http://www.fema.gov/news/newsrelease.fema?id=20869>;  
[http://www.dallashousing.org/Katrina\\_Pages/katrina.html](http://www.dallashousing.org/Katrina_Pages/katrina.html);  
<http://www.dallasnews.com/sharedcontent/dws/dn/latestnews/stories/012406dnmetdha.d0cd958.html>
7. [deleted.]

## Leadership:

8. In the city manager's office, the departments with primary responsibility for housing (Housing, Fair Housing, and Development Services) are under the same assistant city manager.  
[http://www.dallascityhall.com/dallas/eng/html/assistant\\_city\\_manager\\_ryan\\_s.html](http://www.dallascityhall.com/dallas/eng/html/assistant_city_manager_ryan_s.html)
9. However, the large amount of federal funds carried over in 2001 suggests that oversight is not strong. In 2001, the Dallas Housing Department reported a remaining balance of more than \$4 million in HOME funds (FY 1999-2000) that had been earmarked for the Mortgage Assistance Program; more than \$1.5 million in rental housing preservation (including CDBG, HOME, HOPWA) representing almost half of funding which had been available; and more than \$4 million (of \$4.5 available) left unused for CHDO development. See the Housing Department Performance Report for FY99-00 (provided electronically by Charles Brideau, Assistant Director of the Housing Department, April 7, 2006.)
10. For details on recommended changes to the city's programs, see *City of Dallas, Mayor's Task Force on Affordable Workforce Housing, Final Report*. 2002. For progress toward these goals see "50,000 Mile Checkup" on Implementation Status, *Mayor's Affordable Housing Task Force—Implementation Team, Task Force Implementation Update, March 2004*. This report was produced by McKinsey and Company.
11. The mayor spearheaded creation of a comprehensive plan to end homelessness (all cities were required to develop such plans by HUD.) The plan was unveiled in June 2004 and was followed by a campaign to pass bonds for construction of a downtown Homeless Assistance Center. US Interagency Council on Homelessness, e-newsletter, July 6, 2006. *In The Cities: Dallas Reports Progress of 10-Year Plan Implementation and 26% Reduction in Chronic Homelessness*. [http://www.ich.gov/newsletter/archive/07-06-06\\_e-newsletter.htm#article2](http://www.ich.gov/newsletter/archive/07-06-06_e-newsletter.htm#article2). She also spearheaded an effort to raise private funds to temporarily house Katrina evacuees in Dallas until federal funds arrived. Project Exodus raised \$3 million to cover rental assistance and utilities for two months, serving approximately 771 families. This group also granted the city funding to establish a temporary case management program for evacuees. Information from *Project Exodus Summary*, and *Project Exodus II Outreach and Case Management*, provided by Mark Suhm.
12. Most local affordable housing production was supported by federal tax credits until August of 2005 when the city declared a moratorium on the use of tax credits. Ramshaw, E. 2005. *Miller halts tax-credit use*. Dallas Morning News, August 30, 2005. Accessed online Feb 9, 2006:  
<http://www.dallasnews.com/sharedcontent/dws/news/longterm/stories/071305dnmetnotaxcredit.11ccc0b.html>

13. For information on staff levels in the city Housing Department, see *Mayor's Task Force Report*, page 39 "Current Distribution of Housing Department Resources and Impact." (Based on information provided by the city's Housing Department.) For information on funding sources for positions, see <http://www.dallascityhall.com/pdf/FY05AdoptedBudget/General/GeneralFunds.pdf>. The 2004-05 adopted budget proposes listed 15 full time positions in the housing department supported with general revenue funds.
14. Federal sources of funding for affordable housing, which target the lowest income groups, have been declining in recent years. In 2001, the Dallas Housing Department reported a remaining balance or more than \$4 million in HOME funds (FY 1999-2000) that had been earmarked for the Mortgage Assistance Program; more than \$1.5 million in rental housing preservation (including CDBG, HOME, HOPWA) representing almost half of funding which had been available; and more than \$4 million (of \$4.5 available) left unused for CHDO development. Information based on Housing Department Performance Report for FY99-00 provided electronically by Charles Brideau, Assistant Director of the Housing Department, April 7, 2006.

### **Resources:**

15. The city's most recent general obligation bond election was held in 2005: bonds for a new, downtown Homeless Assistance Center were passed. In 2003, bonds supporting land acquisition for the development of low and moderate income, owner-occupied, single family homes passed with over 68% of the vote. For 2003 election see Dallas Ten Year Plan, <http://www.endhomelessness.org/localplans/DallasTX.pdf>. For 2005 election see City council, Finance, Audit and Accountability Committee briefing, [http://www.dallascityhall.com/committee\\_briefings/briefings0506/20060522\\_HomelessLand.pdf](http://www.dallascityhall.com/committee_briefings/briefings0506/20060522_HomelessLand.pdf).
16. *General revenue is provided to the Trust Fund.* \$1 million in general revenue was allocated from the Trust Fund for interim construction loans for affordable single family homes. These funds will revolve. According to the CAPER, \$1,112,900 from the 2003 bond was spent on "infrastructure development of single family homes for mixed income families, including low to moderate income" during FY 2004-05. 2005 CAPER: *HomeMatch Report*
17. Through 2004, the city allocated specific funds to support CHDO operating costs (in 2004, this amount was \$447,641). However, there is no funding allocated to this end for 2005, and \$132,238 was carried over from 2004 to 2005. The city also has a category entitled, "CHDO funds". This level of funding has been reduced from the 2004 amount of \$1,342,925 to the 2005 amount of \$1,270,725 – a reduction of 5%. The city has also reduced the amount provided to "CHDO

Loans” from 134,292 to 127,072 – a 5% reduction. The city continues to fund CHDO Capacity at \$150,000, and that amount has stayed the same for the past decade.

18. *The city rebates development fees if affordable housing is produced.* Affordable housing developments are eligible for waivers of various development fees. This is funded by general revenue. See the 2003 Dallas Consolidated Plan, 9-54. According to the CAPER, the city allocates \$500,000 of TIF district funds annually to rebate developer fees. During FY 2004-2005, only \$151,689 of this funding was spent. However, no information is available as to requirements necessary to receive a rebate, or whether this is a blanket program, or whether rebates are provided on a case by case basis (which is the case with Economic Development fee rebates).
19. *No dedicated, local source of funding for housing:* According to the CAPER, a housing trust fund was created with \$1,000,000 in FY 2000-2001, but the city has not dedicated any additional revenue to this fund. According to the CAPER, \$40,749 was expending in this program during FY2004-2005. This is an entirely inconsequential sum for a city the size of Dallas.
20. *City does not allocate general revenue to housing production or vouchers:* While the city does allocate some general revenue funding to housing related programs, such as the Walker distress Fund and mortgage assistance programs, the city does not appear to directly fund housing production or voucher programs from general revenue. The CAPER mentions only this program as coming from general revenue funding. (2005 Caper: HomeMatch Report)

## **Production:**

21. More than 55,000 Dallas renter households paid more than half of their monthly gross income in rent in 2000. *HUD State of the Cities Datasystem.* [www.huduser.org](http://www.huduser.org).
22. 20,100 households lacked complete kitchen facilities and 9,000 households lacked complete plumbing in 2002. *American Housing Survey for Dallas, Texas Metropolitan Area: 2002.* Tables 2-4 and 2-7.
23. Based on data reported for 1999-2005, it would take more than 32 years for this shortage in units to be addressed and 36 years for units lacking complete kitchens to be repaired. Consolidated Annual Performance Report, FY 2003-2004.
24. A subsequent city ordinance allows use of tax credits for housing for elderly or disabled residents. Although the city maintains a stock of 11,000 housing vouchers, no new vouchers have been added since 2001.

25. The City of Dallas established a Housing Trust Fund in the amount of \$1 million in General Funds in FY 2000-01. Just over \$40,000 of this money was spent in conjunction with HOME program funds in FY 2004-05. *HOME Match Report*, item #4, City of Dallas FY 2004-05, *CAPER*.
26. *Decline in stock of vouchers offset by Walker settlement:* 3,025 additional vouchers were provided by HUD in March of 2001 as part of the Walker settlement. Information obtained from Dallas Housing Authority website March of 2006. Accessed online at <http://www.dallashousing.org/Faq.htm>
27. The reduction in vouchers was reported in a News Posting on DHA website as of March 2006. Accessed online at <http://www.dallashousing.org/Postings/News/Sec8.htm>. The reduction in available vouchers has not been confirmed as of March 30, 2006. Reporting of the additional vouchers was noted as follows on the DHA Developments page: "In March 2001, HUD was released from the lawsuit by providing 3,025 Section 8 vouchers and other resources." Accessed online May 22, 2006, at <http://www.dallashousing.org/Developments.htm>
28. Rehabilitation activity between FY 99-00 and FY 04-05 resulted in the repair/rehab of 3,282 single-family homes, an annual rate of 547. At this rate, it would take over 36 years to rehab the units lacking kitchens. During that same time period, preservation activity of existing multi-family housing only included 415 units, with no preservation reportedly funded for the most recent 2 years. Information is based on Housing Department Performance Report for FY04-05 provided electronically by Charles Brideau, Assistant Director of the Housing Department, January 31, 2006. An additional 57 were in progress at time of reporting
29. For FY 2004-2005, there were more than \$16 million of unexpended CDBG funds at end of program year. *IDIS-C04PR26 of Dallas CAPER 2004-2005* In addition, 16.99% of CDBG funds appropriated for Housing remained unused compared to 5.18% in prior years. *Dallas CAPER 2004-2005, Dallas Community Development Program, Financial Status Report, September 30, 2005, page 1.*
30. Since 2000, an average of 690 affordable rental housing units per year has been added with support from the federal Low Income Housing Tax Credit Program. (Total units approved through July of 2005 were 3,451.) *CAPER*. A current list of Tax Credit Property Inventory is available at: <http://www.tdhca.state.tx.us/multifamily/htc/docs/06-PropertyInventory.pdf>
31. According to the Dallas Housing Authority, HOPE VI Inventory includes multiple properties within the city's 3 HOPE VI projects: Lakewest, Roseland, and Frazier Homes - originally totaling 3,500 public housing units collectively. As of 2005, the DHA HOPE VI inventory the (Lakewest, Roseland, and Frazier

Homes) included 1,043 units with an additional 683 planned through 2008 for an estimated total of 1,726. This number represents a net loss of at least 1,774 public housing units. However, a greater net loss is likely. HOPE VI redevelopment calls for the inclusion of mixed income so that a portion of the replacement units are priced at market rate. DHA does not report the mix of affordable and market units so an accurate measure of loss/gain of public housing units is not possible at this time. Additional information about Dallas HOPE VI projects was obtained from obtained from the DHA website March of 2006. Accessed online at <http://www.dallashousing.org/Faq.htm>

## Targeting:

32. City resources are focused disproportionately on single family over rental. With the exception of 2005, for all years examined, Dallas consistently funded more single family units than rental. Information is based on Housing Department reports for FY 99-00 through FY 04-05 provided electronically by Charles Brideau, Assistant Director of the Housing Department, April 7, 2006.
33. For program year 2003, 86.4% of CDBG funds were targeted for low to moderate-income households. A total of 624 households at or below 80% MFI benefited from application of these funds. *Dallas 2004-2005 CAPER, IDIS Report C04PR23, page 7.*
34. Program rents affordable to a family of 4 at 50% of 2004 regional median family income (or \$31,575) can be as high as \$748 per month. HUD's 2004 fair market rent was set at \$871 for a 2 bedroom apartment. Information about 2004 Program Rents is available from TDHCA at: [http://www.tdhca.state.tx.us/pmcdocs/04-URL\\_HOME\\_rents-040311.pdf](http://www.tdhca.state.tx.us/pmcdocs/04-URL_HOME_rents-040311.pdf) Rents households can afford is based on 35% measure of affordability for Area Median Renter Household Income in 2004. Data based on U.S. Census, American Community Survey, Table B25119. See also <http://www.census.gov/acs/www/Products/Ranking/2003/pdf/R14T160.pdf> and [http://factfinder.census.gov/servlet/GRTSelectServlet?ds\\_name=ACS\\_2004\\_EST\\_G00\\_&lang=en&ts=143461026636](http://factfinder.census.gov/servlet/GRTSelectServlet?ds_name=ACS_2004_EST_G00_&lang=en&ts=143461026636) 2004 FMR data was obtained from HUD User Datasets at: <http://www.huduser.org/datasets/fmr/fmr2004F/index.html> Additional information about HUD Fair Market Rents and data from previous years is available at: <http://www.huduser.org/datasets/fmr.html>
35. Between 2001 and 2005, 795 units were produced with CDBG & HOME funds that were affordable to households with incomes below 30% of regional median household income. (\$31,991 for a household of 4 in 2004). An additional 479 units occupied by families at this income level were rehabilitated. Funding was consistently devoted to mortgage assistance, yet for all years examined that funding targeted more units for homeowner repair than for mortgage assistance.

Information about the targeting of homeownership is based on Dallas Housing Department reports for FY 00-99 through FY 04-05.

36. HUD's SNAPSHOT of HOME Program Performance uses Area Median Family Income (AMI) for measuring low-income benefit. As of 9/30/2004, Dallas utilized 35% of HOME funds used for rental housing were targeted to extremely low-income households, placing the City above the Texas state average of 32%, but well below the national benchmark. Approximately 71% of HOME funds were targeted to very low-income households, compared with the state and national averages of 66% and 75% respectively. Extremely low-income households are defined as those earning less than 30% of area median family income. Very low-income households earn less than 50%. Information is based on 3<sup>rd</sup> quarter reporting from HUD:  
<http://www.hud.gov/offices/cpd/affordablehousing/reports/>
37. General information about the HUD HOME Snapshots is available at:  
<http://www.hud.gov/offices/cpd/affordablehousing/training/materials/factsheets/Snapshots.pdf> Of note, 1<sup>st</sup> quarter 2006 reporting indicated use of HOME funds for extremely low-income households remained at only about 35% for Dallas. Current and past HUD Snapshot reports can be accessed online at:  
<http://www.hud.gov/offices/cpd/affordablehousing/reports/>
38. Despite priorities identified in the Consolidated Plan, HOME funds were used to assist unit completion for 782 homeowners and homebuyers at or below 80% MFI; more than 75% of that assistance was devoted to units below 60% MFI. In sharp contrast, only 2 rental or tenant-based rental assistance (TBRA) units were completed using HOME funds for that same income category (one of these units was "reported as vacant". Information is based on data from the Dallas 2004-2005 CAPER, IDIS Report C04PR23, page 8.

### **Fair Housing:**

39. Figures on segregation are based on 2000 Census data and were calculated by the Lewis Mumford Center.  
<http://mumford.albany.edu/census/WholePop/CitySegdata/4819000City.htm>
40. A 2004 press release from the Dallas housing authority outlines the terms of the settlement, as well as the progress as of December of that year:  
[http://www.dallashousing.org/PDFs/Walker/Lawsuit\\_Settled.pdf](http://www.dallashousing.org/PDFs/Walker/Lawsuit_Settled.pdf);
41. The 2005-2006 Consolidated Plan includes nearly \$550,000 in Fair Housing Enforcement funding to "Provide housing discrimination investigations, housing and related referrals, citizen assistance and related referrals, fair housing education and outreach." According to the CAPER, 92% of these funds were spent, and the city has budgeted \$582,716 for fair housing enforcement for the

years 2006-2007 (see proposed budget amendments: [http://www.dallascityhall.com/council\\_briefings/briefings0506/20060517\\_Straw\\_Vote.pdf](http://www.dallascityhall.com/council_briefings/briefings0506/20060517_Straw_Vote.pdf). Information on enforcement is from the 2003-04 and 2004-05 CAPER, and was provided by Rosie Norris.

42. The most recent study available is from 1998, and is not available online. The majority of the impediments identified include trivial items related to changes in language of the building codes. No critical analysis of the city's own efforts is included. Furthermore, there is no follow up to the identified impediments in the most recent comprehensive plan, nor any mention of the results of the 883 fair housing complaints that were filed as of 1998, much less any discussion of complaints that have been filed since.

*Summary of Impediments Identified: Fair Housing Codes*

- The requirements for group dwellings and group residential facilities should be further reviewed to ensure they do not constitute an impediment to housing choice for persons with disabilities.
- The Dallas Building Code's definition of an accessible route needs to be reviewed
- The definition of 'occupant' in Chapter 27 "minimum housing standards" establishes different treatment for children under age 18.
- The definition of fair housing in Chapter 39A does not include familial status or handicapped persons.
- The definition of habitable floor space in Chapter 39A is inconsistent with minimum housing standards.

*Lending Impediments to Fair Housing Choice*

- Insufficient banking/lending education to minorities
  - Insufficient marketing to minorities in concentrated areas
  - High decline rates to minorities for home mortgages
  - Need for additional banking locations in the southern parts of the city
  - Insufficient single-family lending to minority households
43. The Action Plan included in the Impediments to Fair Housing study is one page in length. Recommendations are not linked to analysis of current impediments and focus on increasing awareness of fair housing issues among housing providers and consumers.
- Encourage housing providers to provide advertisement to race/ethnic diverse community
  - Continue to provide fair housing training to property managers through annual training to HUD assisted housing providers
  - Continue to administer an annual proactive testing program

- Continue to process/initiate housing discrimination complaints according to HUD guidelines
  - Enhance fair housing marketing to home buyers through targeted advertisements
  - Provide education to housing counseling agencies
  - Provide fair lending training to lenders annually and targeted training as needed to institutions with identified issues.
  - Develop and distribute a resource guide on housing for persons with disabilities
44. According to most recently calculated dissimilarity index for the city, 66% of either Blacks or Whites would need to move to achieve full integration. Over 60% of either White or Hispanic households would need to move. Furthermore, while White-Black segregation has declined over the past 20 years (from nearly 79% in 1980), White-Hispanic segregation has increased over the same period (from 55% to 60%)  
<http://mumford.albany.edu/census/WholePop/CitySegdata/4819000City.htm>  
 Black-Hispanic segregation has also declined sharply, from 72% in 1980 to 58% in 2000.
45. Information on the location of public housing units and section 8 voucher locations provided by the Dallas Housing Authority. All data regarding income and race details of census tracts compiled from 2000 census data by the TAHP researchers. A minority census tract is defined as a census tract that contains a higher than average percentage of African Americans or Hispanics compared with the city as a whole. According to the 2000 census, the percentage of African Americans for the Dallas Metropolitan area is 13.64%. Thus, any census tract with an African American population that exceeds 13.64% is considered a minority tract. The percentage of Hispanics in the Dallas metropolitan area is 21.44%. Thus, any census tract with a Hispanic population that exceeds 21.44% is considered a minority tract.
46. A low income census tract is one in which the median income for the tract is less than 50% the Dallas area median income. In 2000, the Dallas Metro AMI was \$47,418. Thus, any tract with a median household income that fell below \$23,709 is considered a “low income tract”. For the purposes of this study, the percentage of African-Americans and Hispanics for each census tract in the city was compared to an overall city average of that group. Thus, any census tract that exceeded the city average was deemed to have an “above average” concentration of the group.
47. LIHTC unit locations obtained from the TDHCA LIHTC database:  
<http://www.tdhca.state.tx.us/multifamily/htc/docs/06-PropertyInventory.pdf>
48. According to the following website, Dallas has adopted the 2003 international building code series:

[http://www.bookmarki.com/Dallas\\_Denver\\_Adopt\\_International\\_Building\\_Code\\_s/176.htm](http://www.bookmarki.com/Dallas_Denver_Adopt_International_Building_Code_s/176.htm) and this series does comply with FHA fair housing requirements: [http://www.bookmarki.com/2003\\_International\\_Building\\_Code\\_Meets\\_FHA\\_Accessibility\\_s/171.htm](http://www.bookmarki.com/2003_International_Building_Code_Meets_FHA_Accessibility_s/171.htm). However, Dallas does not appear on the governor's list of local ordinances that incorporate accessibility requirements: <http://www.governor.state.tx.us/divisions/disabilities/resources/keylaws/localordn/Housing.doc>

## **Transparency:**

49. Although not available online, the Consolidated Plan can be requested from the Budget and Management Office, whose contact information can be found at [http://www.dallascityhall.com/html/budget\\_and\\_management\\_contact.html](http://www.dallascityhall.com/html/budget_and_management_contact.html). (Accessed 6/9/06).
50. Program information and contact information is available on the website of the Housing department. Contact names and telephone numbers are provided. For those needing assistance with housing (whether renters or homeowners), the list of Housing FAQs provides the best starting point. Otherwise, the program information appears aimed at housing providers. <http://www.dallascityhall.com/html/housing.html> (Accessed 6/9/06).
51. The Housing department can help callers in Spanish. However, the more detailed explanations of policies and programs on the website are not provided in Spanish. The Dallas Housing Authority can help callers in Spanish; however their webpage is not available in Spanish. <http://www.dallashousing.org>. (Accessed 6/9/06).
52. DHA's 2005-2009 plan is available on HUD's website at <http://www.hud.gov/offices/pih/pha/approved/pdf/05/tx009v02.pdf>.
53. The most recent audit of the Housing Authority's Hope IV program is posted online. Audit case no. 99-FW-201-1001 (dated October 8, 1998) available at <http://www.hud.gov/oig/ig961001.pdf>. The internal review of the City of Dallas Housing Department, Award and Administering Controls from September 2, 2005 can be found at [http://www.dallascityhall.com/html/2005\\_audit\\_reports.html](http://www.dallascityhall.com/html/2005_audit_reports.html).
54. The CAPER is not available on city websites and was not readily available when requested from the City by phone or email. Eventually, we had to travel to Dallas, go to the department and look through the CAPER to identify sections of interest; these were then copied for us by city staff.