Table 23 shows the total value of the CRA loans made to small businesses by institutions in Dallas County categorized by the median family income of the business applicant's census tract. Columns two through four categorize the total amount loaned by the size of the loan. Column five shows the amount of money loaned to small businesses (revenue less than or equal to $1 million).

Thirty-nine percent of Dallas County CRA loans went to businesses located in census tracts where family incomes are greater than 120% of the area median income for the DFW MSA. Around 15% of CRA dollars went to communities with median incomes below 50% of area median income. Significantly fewer CRA dollars are going to lower income census tracts; this disproportionately affects minority residents who are more likely to live in census tracts with lower median incomes.

Table 23: CRA small business loans by census tract income, Dallas County

% of Area Median Family Income	Loan Amount at Origination < $100,000	Loan Amount at Origination > $100,000 But < $250,000	Loan Amount at Origination > $250,000	Loans to Businesses with Gross Annual Revenues < $1 Million	TOTAL Dollars Loaned	TOTAL % of Dollars Loaned
Dallas County, TX	(Number in 1,000s)					**Percent**
10-20%	275	0	947	6	**1,228**	0.0
20-30%	2,334	1,181	4,011	2,841	**10,367**	0.3
30-40%	31,759	14,647	76,273	28,689	**15,1368**	4.9
40-50%	75,431	38,671	132,173	68,650	**31,4925**	10.3
50-60%	89,941	47,152	203,554	81,626	**422,273**	13.7
60-70%	47,467	17,423	56,663	39,751	**161,304**	5.3
70-80%	34,430	12,190	49,999	29,106	**125,725**	4.1
80-90%	62,866	24,814	101,086	64,385	**253,151**	8.2
90-100%	55,838	19,704	97,294	50,538	**223,374**	7.3
100-110%	35,143	11,043	28,193	31,768	**106,147**	3.5
110-120%	26,566	8,849	23,441	17,099	**75,955**	2.5
>= 120%	295,098	125,761	456,918	311,458	**1,189,235**	38.7
MFI Not Known	5,064	2,114	9,378	2,107	**18,663**	0.6
Tract Not Known	9,881	1,461	1,529	4,600	**17,471**	0.6
TOTAL	**772,093**	**325,010**	**1,241,459**	**732,624**	**3,071,186**	**100%**

The following maps show the distribution of CRA loans by census tracts: darker shade means greater amount. Overall, greater amounts are granted in the northern than the southern sector of the City. Distinctively, census tracts south of I-20 received a greater number of loans than the southern sector (Red Bird area, southeast Oak cliff, Mountain Creek).

R/ECAPs are census tracts characterized by a nonwhite population of at least 50% and a poverty rate of 40% or more (considered extreme poverty). R/ECAPs are delineated in pink in the following map. Overall, R/ECAP census tracts are characterized by a relatively low loan amount. A few exceptions exist, notably for the R/ECAP south of I-20 and the one in the Vickery Meadow area.
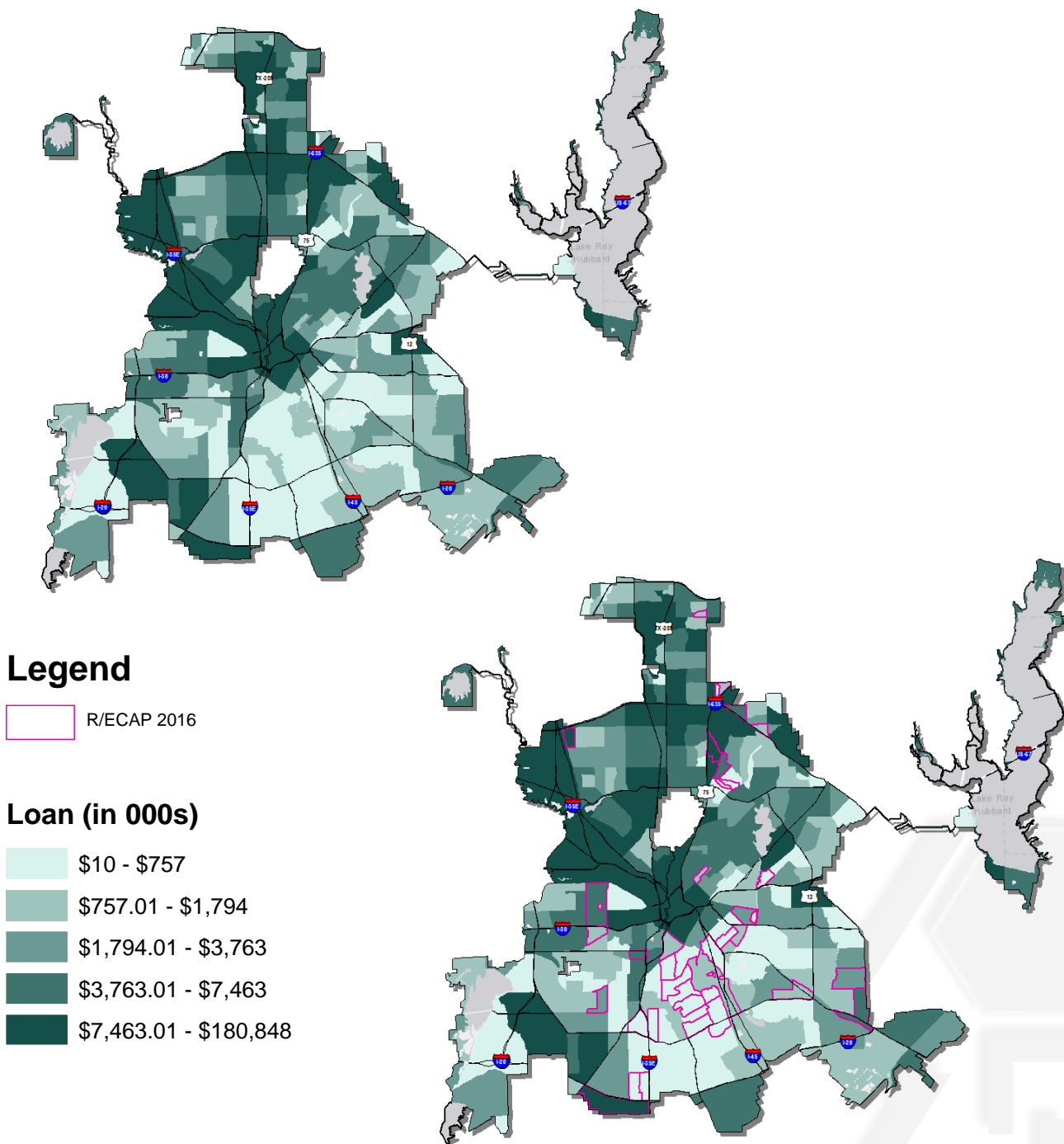
Legend

R/ECAP 2016

Loan (in 000s)

- $10 - $757
- $757.01 - $1,794
- $1,794.01 - $3,763
- $3,763.01 - $7,463
- $7,463.01 - $180,848

Figure 50: CRA small business loans amount by census tract overlaid with R/ECAPs, Dallas

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

Key Findings

The following maps shows the location of R/ECAPs in 1990, 2000, 2010, 2013, 2015 and 2016. A few key patterns emerge:

- Long-lasting R/ECAPs in south Dallas and west Dallas
- Proliferation of R/ECAPs over time
    - 1990: 18
    - 2000: 18
    - 2010: 32
    - 2013: 33
    - 2015: 32
    - 2016: 36
- Spatial dispersion of R/ECAPs across the City
- R/ECAPs tend to be characterized by not only extreme poverty but by racial segregation (highest segregation grades, nonwhite concentration above 90%)
- R/ECAPs tend to emerge as a result of poverty increase, as opposed to a nonwhite population increase

Overview

In 1990, 15 of the 18 R/ECAPs in Dallas appeared in southeast Dallas near Fair Park and the I-45 and SH 175 corridors. One isolated R/ECAP in Old East Dallas persists even though it briefly dropped out of R/ECAP status in 2010. Another isolated R/ECAP has existed for 25 years between Hampton and Westmoreland and north of I-30 in west Dallas. The final 1990 R/ECAP also persists in Oak Cliff north of the Dallas Zoo and near the Bishop Arts District even though it failed to meet the poverty requirement in 2000, 2010 and 2015. Two-thirds of the 18 R/ECAPs in 1990 persist in 2016 and only two of the six redesignated tracts (48113020300 and 48113020400) have poverty rates less than 35%, which means most remain at risk for R/ECAP classification.

In 2000, the R/ECAP distribution appeared remarkably similar to 1990 with 14 of the 18 R/ECAPs appearing in southeast Dallas (a few census tracts changed designation) while three new persistent R/ECAPs developed. The first north Dallas R/ECAP appeared near Richardson between Coit Road and US 75. Another persistent R/ECAP appeared east of Samuell Grand Park. Seventy-two percent of the R/ECAPs in 2000 persist 16 years later and only two of the redesignated tracts (48113020300 and 48113020400) have poverty rates less than 35%, which means most remain at risk for R/ECAP classification.

The 2010 census identified 17 new R/ECAPs throughout the City. While some of these remain (35%), many others have lost their R/ECAP designation as their poverty rate fluctuates. The improvements in many of these new R/ECAPs appear significant with the poverty rate exceeding 35% for only about 25% of the reclassified tracts, which indicates almost half of the new tracts appear at risk for R/ECAP classification in 2020.

In general, despite the relative waxing and waning and dispersion and concentration of R/ECAP clusters, over the years, south Dallas, east and central Oak Cliff, the Red Bird area and west Dallas consistently encompass the long-lasting R/ECAPs in the south, southwest and western sectors. In the City's east sector, Old East Dallas and far east Dallas have fewer but

also enduring R/ECAP areas, and to the north and northwest, far north Dallas (since 2000) and east Dallas (since 2010) have continuously included at least one R/ECAP.

The following table lists the census tracts that qualified as a R/ECAP at least once between the snapshot years 1990-2016. For each of these census tracts, the table lists the segregation level as well as the poverty and nonwhite concentration levels for 2015 and 2016. By 2015 and 2016, the 1990 census tracts closest to the CBD have lost their R/ECAP designation, but new emerging areas of concern seem to be appearing. In north Dallas, the Vickery Meadow area, two tracts in far northeast Dallas north of I-635 near Garland, another in far north Dallas and a final tract in northwest Dallas all have current R/ECAP designations. The Vickery Meadow area has persisted for the entire decade. In east Dallas, an area near Eastfield College appears at risk, and an area in Pleasant Grove has a R/ECAP that has persisted for the decade. The area near Kiest Park has a new R/ECAP emerging and the area between US 67, I-35E and DeSoto has numerous emerging R/ECAPS, especially near highways. These new R/ECAP locations emerge due to an increase in their poverty rates. Thus these tracts, already characterized by a high nonwhite concentration (and likely segregation), also experience an increase in poverty.
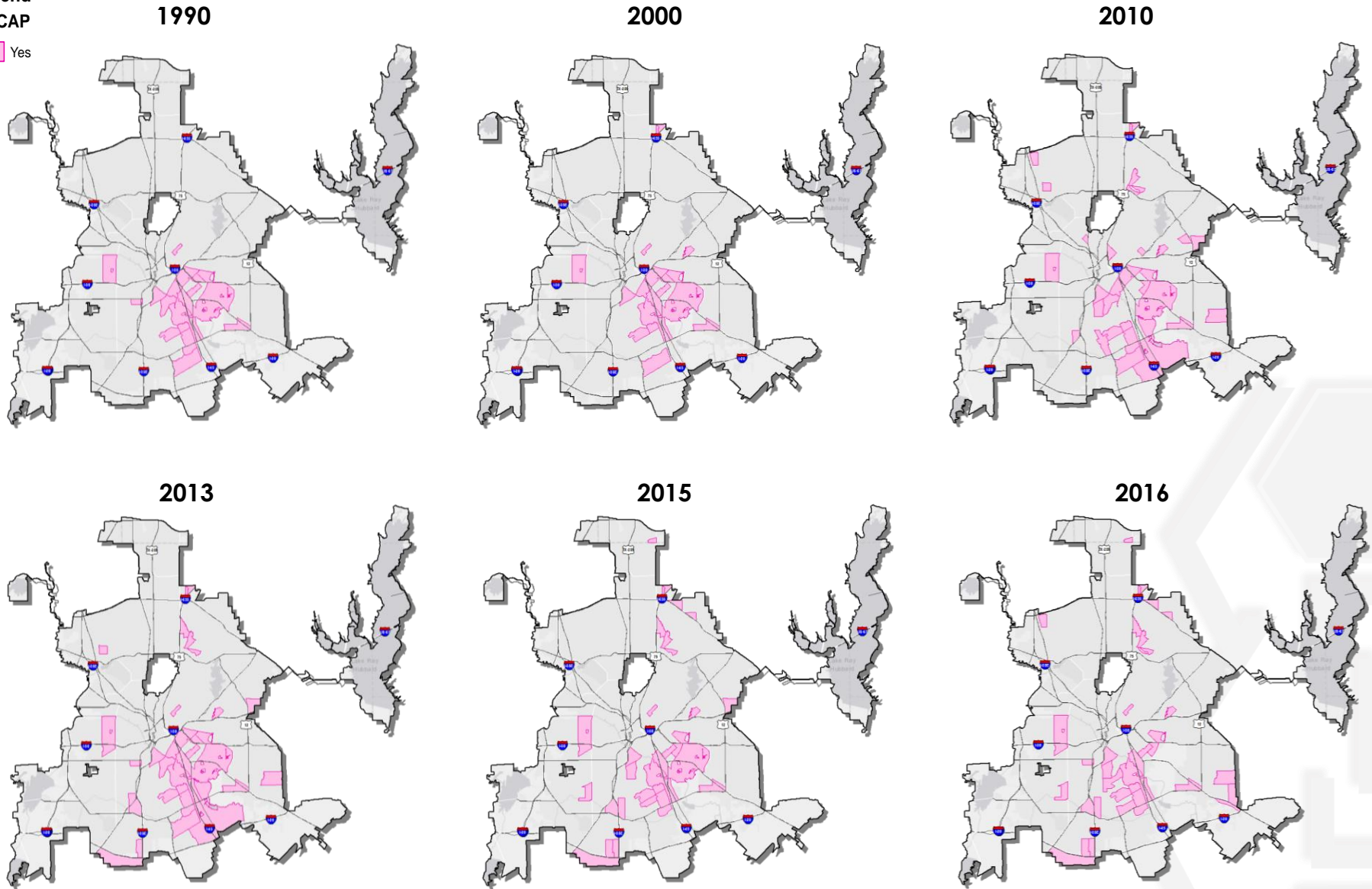
Legend
R/ECAP
Yes

1990

2000

2010

2013

2015

2016

Figure 62: R/ECAPs patterns 1990-2016, Dallas

Table 27: R/ECAPs over time: change in poverty and nonwhite concentration, Dallas

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015	2016	2016
48113002701	1	1	1	1	1	1	6	6	58	100	55	99
48113004100	1	1	1	1	1	1	6	5	47	98	45	98
48113008604	1	1	1	1	1	1	6	6	53	98	55	98
48113008802	1	1	1	1	1	1	6	6	52	98	50	98
48113009304	1	1	1	1	1	1	6	6	64	98	57	98
48113020500	1	1	1	1	1	1	6	5	57	93	55	91
48113008603	1	1	0	1	1	1	5	6	52	99	51	100
48113004000	1	1	0	1	1	1	5	6	45	99	46	99
48113008701	1	0	1	1	1	1	5	6	50	99	44	99
48113019212	0	1	1	1	1	1	5	6	52	98	46	98
48113003800	1	1	0	1	1	1	5	5	41	97	41	97
48113011500	1	1	1	1	1	0	5	6	44	99	39	97
48113012208	0	1	1	1	1	1	5	5	43	95	42	95
48113001503	1	1	0	1	1	1	5	4	55	84	54	86
48113019213	0	1	1	1	1	1	5	3	48	77	45	79
48113011401	1	1	1	0	0		4	6	39	97	35	97
48113007820	0	0	1	1	1	1	4	4	48	83	46	90
48113020300	1	1	1	1	0	0	4	5	31	91	34	90
48113003400	1	1	1	1	0	0	4	4	34	88	26	88
48113007815	0	0	1	1	1	1	4	4	58	86	50	87
48113002702	1	1	0	1	0	0	3	6	37	98	36	99
48113004900	0	0	1	0	1	1	3	6	50	98	53	99
48113008900	1	0	1	1	0	0	3	6	40	98	39	97
48113003901	0	0	1	0	1	1	3	6	51	98	53	96
48113011105	0	0	0	1	1	1	3	5	47	96	40	96
48113012302	0	0	1	1	1	0	3	5	42	94	38	94

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015	2016	2016
48113006900	0	0	0	1	1	1	3	5	53	88	49	92
48113011800	0	0	1	1	0	1	3	5	36	94	46	91
48113016605	0	0	0	1	1	1	3	5	46	90	44	90
48113004700	1	0	0	1	0	1	3	5	39	89	41	89
48113006002	0	0	0	1	1	1	3	4	42	82	41	81
48113007823	0	0	0	1	1	1	3	3	48	76	41	77
48113011104	0	0	0	0	1	1	2	6	47	99	46	100
48113006001	0	0	1	1	0	0	2	6	33	99	31	99
48113020200	0	0	1	1	0	0	2	6	29	99	29	99
48113010804	0	0	0	0	1	1	2	5	43	96	46	97
48113005902	0	0	0	0	1	1	2	5	46	95	43	96
48113018503	0	0	0	0	1	1	2	5	42	90	42	93
48085031720	0	0	0	0	1	1	2	4	45	83	43	87
48113019016	0	0	0	0	1	1	2	3	47	74	40	75
48113009610	0	0	1	0	0	1	2	3	38	71	40	70
48113009804	0	0	1	1	0	0	2	3	39	74	39	67
48113008703	0	0	0	0	1	0	1	6	41	98	39	99
48113005500	0	0	0	0	0	1	1	6	38	98	41	98
48113008704	0	0	0	0	0	1	1	6	40	98	42	98
48113001204	0	0	1	0	0	0	1	5	19	97	17	95
48113005700	0	0	1	0	0	0	1	6	40	98	36	95
48113011702	0	0	0	0	0	1	1	5	37	91	42	92
48113007818	0	0	0	0	0	1	1	5	38	90	40	90
48113000405	0	0	1	0	0	0	1	4	30	80	29	81
48113012210	0	0	1	0	0	0	1	4	34	77	31	81
48113007819	0	0	1	0	0	0	1	3	30	74	27	80

Census Tract ID	R/ECAP						Total Number of years	Segregation (2015)	Percent Poverty	Percent Nonwhite	Percent Poverty	Percent Nonwhite
ID	1990	2000	2010	2013	2015	2016	(1990-2016)	Grade	2015	2015	2016	2016
48113001600	0	0	1	0	0	0	1	1	31	60	29	57
48113014204	0	0	1	0	0	0	1	1	37	54	43	46

R/ECAP: 1(Yes)/ 0 (No)
Segregation Grade (2015)

Nonwhite share 30% to 40% greater than jurisdiction: **6**　　Nonwhite share 0% to 10% greater than jurisdiction: **3**
Nonwhite share 20% to 30% greater than jurisdiction: **5**　　Nonwhite share similar to jurisdiction's share: **2**
Nonwhite share 10% to 20% greater than jurisdiction: **4**　　Greater White population share than jurisdiction: **1**

Change in R/ECAP over the years

The following map shows in pink the census tracts that have been designated as a R/ECAP at least once during 1990, 2000, 2010, 2013, 2015 and 2016. These census tracts are also labeled based on the number of years for which they have been a R/ECAP.
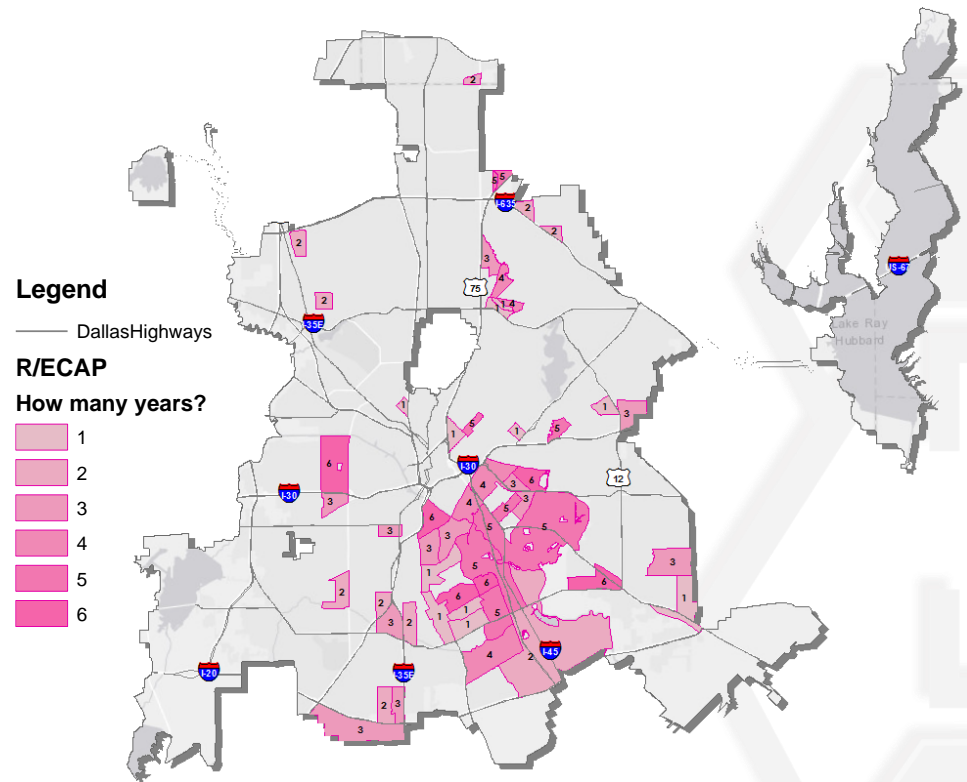
Legend

—— DallasHighways

R/ECAP
How many years?

	1
	2
	3
	4
	5
	6

Figure 63: R/ECAPs presence over time

Enrollment Policies

DISD follows primarily the traditional model of "**neighborhood attendance zones**", where most students are assigned to schools based on their residence. Parents are required to provide proof of residency for enrollment.

The following descriptive summary of **public school choice** options is extracted from DISD's informational guide for parents and students (FAQ) on the DISD website:

- Magnet Schools: This is a pre-existing list. The schools will stay the same as well as the academic entry requirements. The success of the district's Magnet offerings is a key driver in the district's commitment to expand a "best-fit" school for every child in Dallas ISD without academic entry requirements.

- Transformation Schools (Choice School): These are start-up campuses that design and implement a new school-wide Choice model. They do not have academic or parental entry requirements and showcase district-wide open enrollment procedures. They will open in previously vacant buildings, new school buildings, or in nontraditional spaces such as a co-location with a community college.

- Innovation Schools (Choice School): These are existing neighborhood schools that re-purpose the existing campus into a school-wide Choice model. They do not have academic or parental entry requirements. They stay in their existing facilities with current staff and continue to enroll students from their traditional attendance zones, maintaining their traditional neighborhood identities[10].

- In-school Choice Programs: These are small-scale choice programs that exist within a school. They are not school-wide models and not every student in the school participates. They may or may not have entry requirements.

School attendance zone boundaries, especially when tied to demographically identifiable neighborhood boundaries, produce public schools reflecting the demographics of the neighborhood. As such, attendance zones in racially/ethnically segregated neighborhoods are likely to produce segregated schools. Given the high degree of racial/ethnic segregation characterizing Dallas and in the context of fair housing, well-executed school choice systems are viable tools to foster integration and bridge disparity gaps.

Variations within but also across districts have the potential to deepen school segregation and unequal educational opportunities. The following tables compare adjacent districts characteristics and performance (Figure 87 and Table 37).

Considerable differences exist not only in terms of the socio-demographic characteristics, but also the performance rate of students served in each district. Highland Park ISD, which recorded a STAAR achievement rate of 97%, serves primarily white and no low-income students. On the other hand, DISD serves primarily low-income, nonwhite students and has a STAAR achievement rate 30 percentage points lower than Highland Park ISD.

As advanced by Tegeler and Hilton (2017), "the ability of wealthier towns to maintain high housing prices, commensurately high tax bases and well-resourced schools, and creating costly externalities in nearby cities and towns that have disproportionate shares of poor families— is a key structural driver of segregation".

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[10] Commentary: the research has established that attendance zone boundaries tied to racially and economically segregated neighborhoods will likely produce segregated schools and perpetuate unequal educational opportunities.

Table 37: School district characteristics and performance

	Dallas ISD	Richardson ISD	Uplift Education ISD	Duncanville ISD	Highland Park IDS
STAAR Achievement (All students)	67%	79%	74%	66%	97%
STAAR Achievement (Low Income)	66%	70%	70%	64%	N/A
Percent White	5.13%	29.7%	4.2%	3.9%	85.8%
Percent African American	22.5%	21.1%	19%	40.9%	0.7%
Percent Hispanic	69.6%	38.9%	67.6%	52.3%	4.9%
Percent Other	2.4%	10.4%	9.3%	3.6	8.6%
Low-Income	87.8%	54.2%	75.4%	76%	0%
LEP/English Learner	43.9%	25.8%	31.5%	18.6%	0.8%
Mobility	20.4%	17.1%	4.8%	18.4%	2.3%
Enrollment	157,787	39,170	15,768	12,792	7,024
Student-teacher ratio	15 to 1	15.2 to 1	15.8 to 1	15.5 to 1	15 to 1
Average Teacher Salary	$56,063	$54,538	$50, 268	$54,422	$55,319
Average teacher Experience (years)	9.9	9.9	2	9.4	13

Legend
▢ Elementary Attendance Boundaries (140)
Greater Dallas Area

Name ISD
▢ Carrollton-Farmers Branch ISD
▢ Cedar Hill ISD
▢ Coppell ISD
▢ Dallas ISD
▢ DeSoto ISD
▢ Duncanville ISD
▢ Forney ISD
▢ Garland ISD
▢ Grand Prairie ISD
▢ Highland Park ISD (Dallas)
▢ Irving ISD
▢ Lancaster ISD
▢ Lewisville ISD
▢ Mesquite ISD
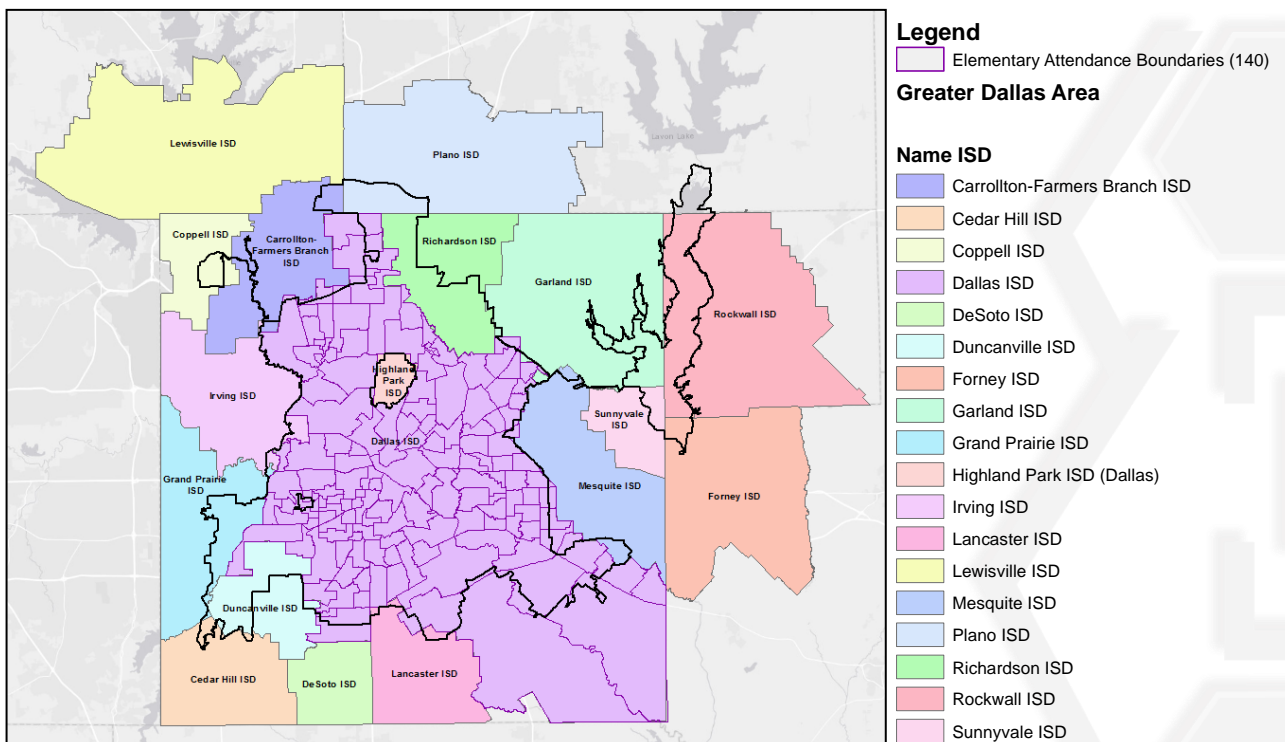▢ Plano ISD
▢ Richardson ISD
▢ Rockwall ISD
▢ Sunnyvale ISD

Figure 87: Independent school district boundaries (source: Texas Education Agency)

Patterns of segregation and R/ECAPs

A census tract is designated as a R/ECAP if it meets the racial/ethnic and poverty concentration thresholds set by HUD (50% nonwhite population and poverty rate 40%). For the purpose of this assessment of fair housing, it is critical to bring nuance to the concepts of **concentration** and **segregation** and shed light on the compounding barriers faced by residents of specific neighborhoods in Dallas.

R/ECAP census tracts in the City of Dallas not only are characterized by an "extreme poverty" level (Wilson, 1980; HUD, 2017), but also by the most severe degrees of racial/ethnic segregation found in the City (darkest shades of green).

Most of the R/ECAPs is Dallas have a share of nonwhite residents that is 30%-40% greater than the City average.
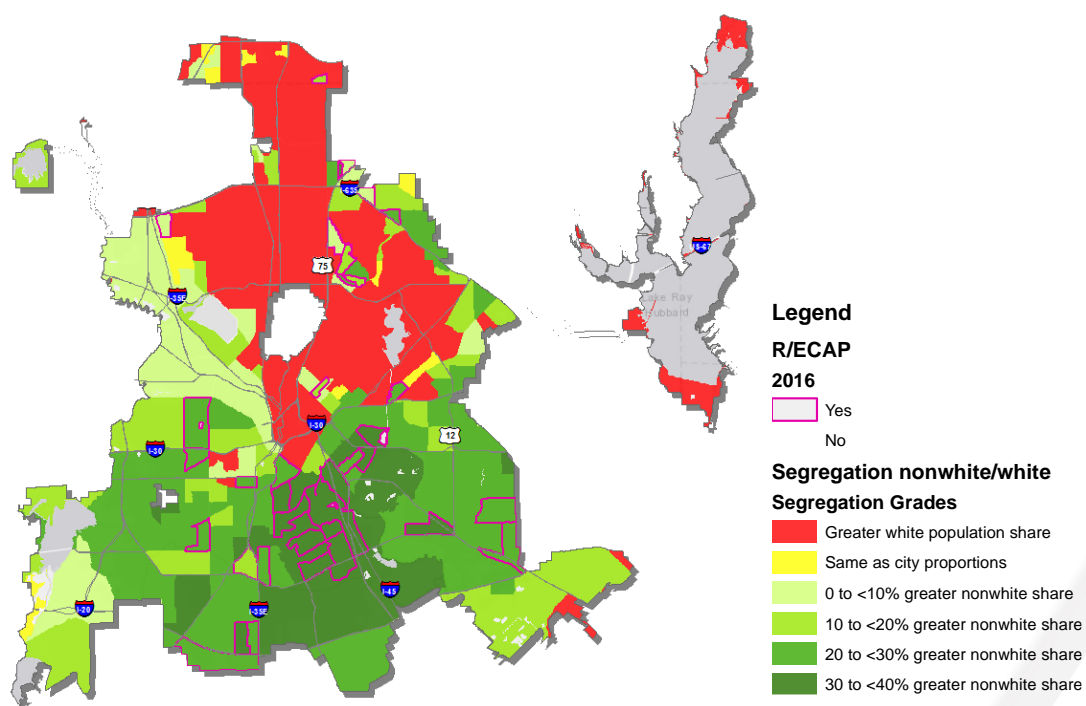
Figure 70: Segregation patterns and R/ECAPs, Dallas

Housing Choice Voucher Families and R/ECAPs

Housing Choice Voucher (HCV) families tend to be disproportionately in protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. Therefore, examining the residential patterns of HCV families with respect to R/ECAPs is particularly relevant for assessing fair housing issues.

Local data was collected from the participating jurisdictions in the North Texas Regional Housing Assessment regarding the residential patterns of HCV families. A total of 27,743 HCV families were located across the North Texas region. The City of Dallas is home to 10,531 HCV families.

As of 2016, Dallas had 36 R/ECAP census tracts. An estimated 3,000, or 28%, of the HCV families residing in Dallas were located in R/ECAPs. The number of HCV families in R/ECAP tracts ranged from 1 to 286, with an average of 83 families. The average number of HCV families in non-R/ECAP, HCV-populated census tracts, is 22. In sum, the concentration of HCV families is disproportionately greater in R/ECAP as opposed to non-R/ECAP census tracts.

Summary key facts:

- Of the 380 census tracts in Dallas, 36 are R/ECAP
- Thirty-six R/ECAP census tracts were home to 28% of all HCV families in Dallas, as of 2016
- The average number of HCV families is disproportionately greater in R/ECAPs (83 families) than in non-R/ECAPs (22 families) and in non-R/ECAPs with at least one HCV family (39 families).
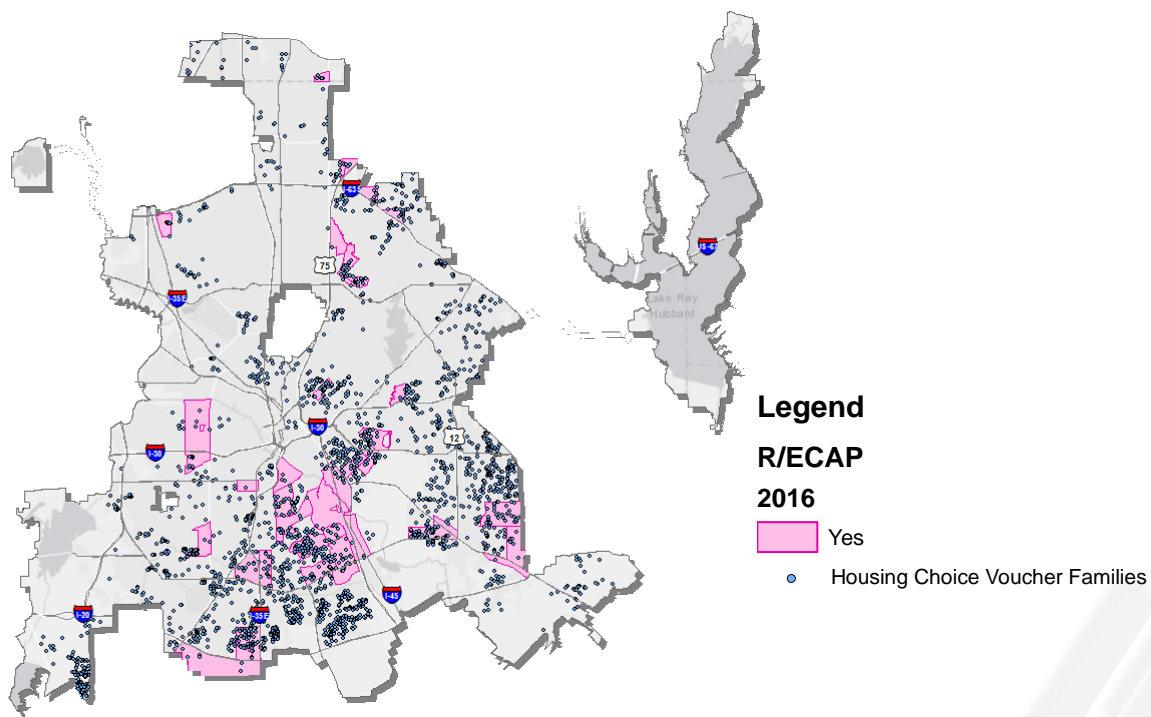

Figure 71: HCV residential patterns and R/ECAPs, Dallas

<u>Supportive Housing for the Elderly (Section 202) and for Persons with Disabilities (Section 811), Project Based Section 8</u>

The Fair Housing Act prohibits discrimination on the basis of race, color, national origin, religion, sex, familial status and **disability**. While age is not explicitly designated as a protected class concern (familial status aside), disabilities tend to be more predominant among older individuals. It is important to note that the Age Discrimination Act of 1975 and HUD's implementing regulations (24 CFR Part 146) prohibit age discrimination in the provision of programs receiving federal financial assistance. Within this context, the following section examines the residential patterns of HUD-subsidized households with a disability that are participating in Supportive Housing for the Elderly (Section 202), in Persons with Disabilities (Section 811) and in project-based voucher programs.

Figure 72 the locational characteristics and residents-related information for Section 202 and Section 811 housing developments in Dallas.

Housing Choice Voucher single mothers with children

Local data was collected from the participating jurisdictions in the North Texas Regional Housing Assessment regarding the residential patterns of Housing Choice Voucher (HCV) families in the region. A total of 27,743 HCV families were located.

More than 3,800 of HCV families residing within the City are led by a single mother with one or more dependents[4]. The map below shows the residential patterns of these families with respect to segregation. It appears that single mother-led families tend to disproportionately reside in Dallas' most segregated neighborhoods (darkest green).
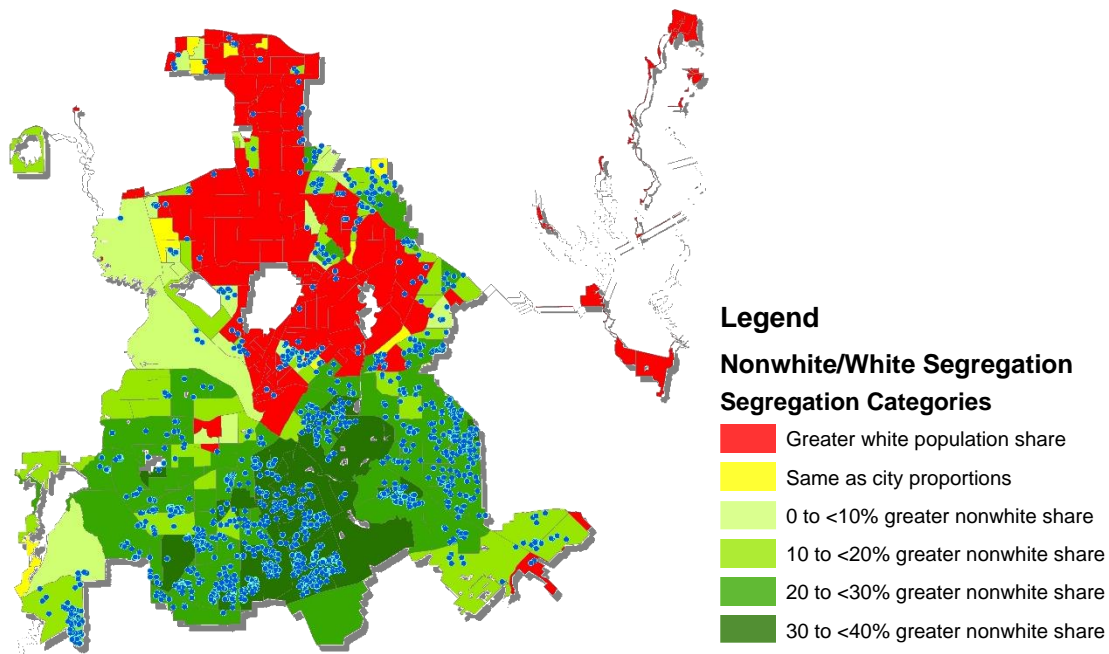

Legend

Nonwhite/White Segregation

Segregation Categories

🟥	Greater white population share
🟨	Same as city proportions
🟩	0 to <10% greater nonwhite share
🟩	10 to <20% greater nonwhite share
🟩	20 to <30% greater nonwhite share
🟩	30 to <40% greater nonwhite share

Figure 41: HCV single mothers' residential patterns and segregation (Source: NTRHA, 2017)

Housing Choice Voucher program, source of income discrimination and segregation

The ability of HCV families to secure housing in integrated, opportunity-rich neighborhoods is not only affected by market constraints but also by the ability to use and access information, as well as by discrimination. Research suggests that voucher holders would like to move to higher opportunity neighborhoods but often are unable to do so (Tighe, Hatch and Mead 2017). A justification for their inability to access opportunity-rich neighborhoods is that in most cities and states, local law allows landlords to refuse vouchers. Texas law (TX LOCAL GOVT § 250.007) preempts local governments from protecting housing voucher recipients.

HCV families tend to be disproportionately members of protected classes under the Fair Housing Act and other applicable laws prohibiting discrimination. Thus, source of income discrimination against HCV families has the potential of being illegal because members of protected classes are disproportionately harmed (Tighe, Hatch and Mead 2017).

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[4] Dependents are defined as "people under 18, or with disability, or full-time student

Daniel and Beshara, P.C., conducted a survey of private market-rate multifamily apartment complexes in Dallas to gauge the participation rate of landlords in the HCV program. An overwhelming majority (87%) of the surveyed landlords do not accept vouchers (Inclusive Communities Project, 2017). To further gain insight on the intersection of source of income discrimination, patterns of segregation and the residential living patterns of HCV families, the following maps were created:

- ○ Surveyed landlords refusing vouchers (overlaid with segregation patterns)
- ○ Surveyed landlords accepting vouchers (overlaid with segregation patterns)
- ○ HCV residential living patterns (overlaid with segregation patterns)

Figure 43 shows that the surveyed landlords refusing vouchers tend to be disproportionately located in neighborhoods with a significantly greater share of white population than the City average (red shade). As for the surveyed landlords accepting vouchers, they are primarily located in census tracts with a significantly greater share of nonwhite population (Figure 42). Correspondingly, HCV families tend to disproportionately reside outside of neighborhoods in which the surveyed landlords refuse vouchers (red shades, Figures 43 and 44).
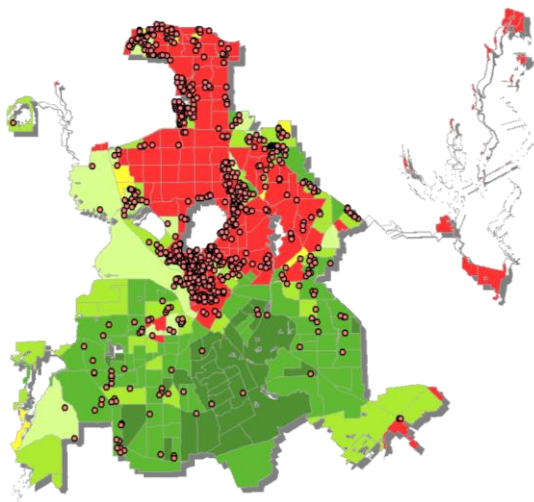

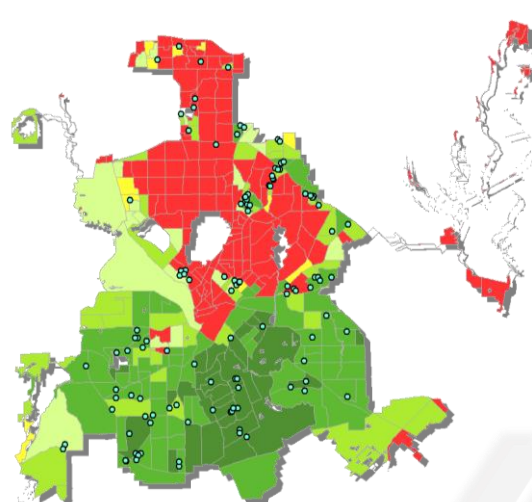*Figure 43: Surveyed landlords refusing vouchers (Source: ICP, 2017)*

Figure 42: Surveyed landlords accepting vouchers (Source: ICP, 2017)

Legend

Nonwhite/White Segregation

Segregation Categories

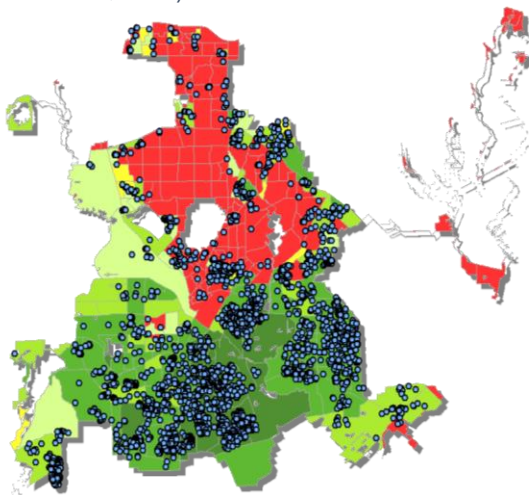|	
🟥	Greater white population share
🟨	Same as city proportions
🟩	0 to <10% greater nonwhite share
🟩	10 to <20% greater nonwhite share
🟩	20 to <30% greater nonwhite share
🟩	30 to <40% greater nonwhite share

Figure 44: HCV residential patterns and segregation (Source: NTRHA, 2017)