



March 9, 2020

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Re: Docket No. FR 6123-P-02, RIN 2577-AA97, Affirmatively Furthering Fair Housing Proposed Rule

To Whom It May Concern:

As housing policy researchers, we have devoted our careers to studying federal housing assistance programs and their role in creating access to fair and affordable housing, lifting families out of poverty, and supporting equitable access to opportunity. We write to offer a public comment on the US Department of Housing and Urban Development's (HUD's) proposed rule<sup>1</sup> on Affirmatively Furthering Fair Housing, published on January 14, 2020. We are employed by the Urban Institute—a nonprofit research and policy organization based in Washington, DC—but are presenting our own views in this submission.

## Introduction

The Fair Housing Act<sup>2</sup> of 1968 prohibits discrimination in the provision of housing based on race, color, religion, sex, disability, familial status, or national origin. The Act intends to prevent discrimination and reverse long-standing patterns of housing segregation, and in doing so imposes a duty on HUD and other federal agencies to affirmatively further fair housing (AFFH). For HUD, this includes a mandate to ensure that federal housing funds and programs address residential segregation and discrimination against groups protected under the Act. The AFFH rule adopted in 2015 was HUD's most rigorous attempt in nearly 50 years to fulfill the affirmatively furthering fair housing requirement of the Act. The 2015 rule gives jurisdictions the data and tools (known as AFFH-T)<sup>3</sup> to map and assess housing segregation, areas of racially and ethnically concentrated poverty, concentrations of housing cost-burdened households, and concentrations of federally assisted housing—all disaggregated by protected groups, such as people of color and people with disabilities.

The 2015 AFFH rule requires that communities, in some cases for the first time, measure the spatial distribution of residents by race, ethnicity, disability status, and other characteristics to then address racial segregation, concentrated poverty, and other patterns that suggest inequitable housing access by protected

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<sup>1</sup> The proposed rule can be found online, accessed March 9, 2020, <https://www.govinfo.gov/content/pkg/FR-2020-01-14/pdf/2020-00234.pdf>.

<sup>2</sup> The Fair Housing Act is specified online, accessed March 9, 2020, <https://www.justice.gov/crt/fair-housing-act-2>.

<sup>3</sup> The AFFH-T mapping tools are available online, accessed March 9, 2020, <https://egis.hud.gov/affht/>.

classes. A troubling aspect of HUD’s proposed revisions to AFFH is that they strip out this critical requirement.

Although we can point out additional problematic aspects of HUD’s proposed changes to the 2015 AFFH rule, this comment focuses on issues surrounding one key flaw: the scoring and ranking system proposed by HUD to reward higher-performing jurisdictions and penalize lower performers fails to affirmatively further fair housing. It could instead reward jurisdictions that impose or perpetuate barriers to fair housing. Specifically, the proposed ranking system omits important metrics and data describing housing access for groups protected under the Fair Housing Act. In addition, none of the metrics proposed by HUD capture how access to housing varies across neighborhoods within a jurisdiction, which could compound segregation and concentrated poverty—two harms that the Fair Housing Act was enacted to address.

These omissions cannot be attributed to lack of readily available data, since HUD has made detailed data describing segregation and housing characteristics for protected groups publicly available under the 2015 AFFH rule. We use these data in our analysis described below and include them with this comment.<sup>4</sup>

Specifically, we use HUD’s AFFH data to illustrate of how omitting disparities in housing outcomes and measures of segregation and concentrated poverty can obscure discriminatory or inequitable patterns in local jurisdictions.

## HUD’s Proposed Ranking System

HUD proposes to develop a “jurisdictional risk analysis” to score and rank places that directly receive Community Development Block Grant (CDBG) funds from HUD, commonly referred to as entitlement jurisdictions and referred to by HUD as “participants” in the proposed rule.<sup>5</sup> There are 1,170 entitlement jurisdictions nationwide.<sup>6</sup>

While HUD does not provide a proposed risk analysis methodology, it states that it will rank entitlement jurisdictions by three aspects of housing accessibility:

1. the number of adjudicated fair housing claims,
2. the adequate supply of affordable housing throughout the jurisdiction, and
3. the adequate supply of quality affordable housing.

We focus on the second and third metrics for this comment. Under the proposed rule, “adequate supply” of affordable and quality housing would be measured using aggregate metrics of local housing conditions by entitlement jurisdiction. A non-exhaustive list of nine metrics are provided in the proposed rule, including housing cost burden, median home value and contract rent, vacancy rates, rates of lead-based paint poisoning, rates of subpar public housing conditions, the existence of excess housing choice voucher

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<sup>4</sup> The raw data for download are available online, accessed March 4, 2020, <https://www.hudexchange.info/resource/4868/affh-raw-data/>.

<sup>5</sup> CDBG entitlement jurisdictions are communities that receive funds through the CDBG program to revitalize neighborhoods, bring economic development, and improve community facilities and services. HUD proposes to at a minimum use entitlement jurisdiction as the universe of jurisdictions for AFFH. More details about the CDBG program are available online, accessed March 4, 2020, <https://www.hudexchange.info/onecpd/assets/File/CDBG-National-Objectives-Eligible-Activities-Appendices.pdf>.

<sup>6</sup> Entitlement jurisdictions may be the principal cities of metropolitan statistical areas, other cities with populations of 50,000 or more, or urban counties with populations of at least 200,000 people. For information on CDBG entitlement jurisdictions, see <https://www.hudexchange.info/programs/cdbg-entitlement/>. Units of general local government that do not receive CDBG funds directly from HUD are known as non-entitlement areas and include cities with populations of less than 50,000 (except those designated principal cities of metropolitan statistical areas), and counties with populations of less than 200,000.

reserves, the availability of housing accessible to people with disabilities, and percentage of dwellings lacking complete plumbing or kitchen facilities.

Under the proposed rule, it would no longer be necessary to examine variations in these metrics by race or by other protected groups. The proposal states that “studies have demonstrated that single-parent households, elderly households, and households of color are more likely to be cost-burdened by housing. Increasing overall affordability will, therefore, help members of protected classes maximize their ability to live where they choose.” Instead, HUD’s proposed scoring and ranking system appears to be based solely on metrics of housing conditions for the jurisdiction’s whole population.

HUD indicates the department plans to use the ranks generated from the scoring system to identify and reward high-performing entitlement jurisdictions with incentives and other awards, and to target the lowest-performing entitlement jurisdictions for “remedial resources and potential regulatory enforcement actions.” This suggests that jurisdictions that perform well on the aggregate metrics could be rewarded by HUD, even if they would perform poorly if the same metrics were disaggregated by race or other protected categories.

## What Happens when You Take Race out of Fair Housing?

HUD’s assumption that all residents of a jurisdiction will benefit from improvements in affordable or quality housing ignores evidence documenting inequitable access to housing for protected classes.<sup>7</sup> For example, a community may appear to perform well using race-neutral, aggregate metrics of housing access because the market tends to benefit the white majority, yet leaves Black or Latino<sup>8</sup> residents behind. As such, a race- or ethnicity-blind expansion of affordable housing, even with the expressed intent of increasing housing opportunities for all residents, risks disproportionately benefiting historically advantaged groups and perpetuating patterns of disadvantage rather than correcting disparities caused by structural racism or discrimination. Removing metrics of disparate outcomes for members of protected classes from assessments of access to housing raises the concern that HUD’s proposed approach disregards the core purpose of the Fair Housing Act.

To understand whether rankings differ when using aggregated metrics versus disaggregated metrics, we use HUD’s AFFH data for the 100 most populous entitlement jurisdictions to explore what happens when race is omitted from assessments of jurisdictions’ progress in affirmatively furthering fair housing. These 100 areas contain 43 percent of the population living in entitlement jurisdictions nationwide.

We first select an indicator of aggregate housing affordability identified by HUD for use in the proposed ranking system—severe housing cost burden<sup>9</sup>—as our sample metric and calculate the share of all residents with severe housing cost burden. We then contrast this race-neutral metric against five additional metrics of racial segregation and housing affordability for Black and Latino residents:

1. the percentage of Black residents with severe housing cost burden;
2. the percentage of Latino residents with severe housing cost burden;
3. the ratio of the percentage of Black residents experiencing severe housing cost burden to the percentage of white residents experiencing severe housing cost burden—values greater than one show Black residents disproportionately experience cost burden;

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<sup>7</sup> This includes evidence from HUD-sponsored paired testing studies of housing market discrimination, accessed March 9, 2020, <https://www.urban.org/features/exposing-housing-discrimination>.

<sup>8</sup> In these comments, the authors use Black to describe people of African descent and Latino to describe people with Latin American ancestry. We use these terms because they represent current best practices from the literature for inclusivity, but we acknowledge that these terms have limitations.

<sup>9</sup> Defined as households with monthly housing costs (including utilities) exceeding 50 percent of their monthly income.

4. the white/nonwhite dissimilarity index<sup>10</sup> from the 2010 Decennial Census, a common measure of racial segregation that captures the relative distributions of two groups—a higher value indicates a higher level of segregation; and
5. for jurisdictions with racially and ethnically concentrated areas of poverty (R/ECAPs),<sup>11</sup> the percentage of occupied federally assisted rental housing units<sup>12</sup> in R/ECAP neighborhoods compared with outside the R/ECAPs but still within the jurisdiction—higher shares of assisted housing units inside a R/ECAP indicate less neighborhood and housing choice for low-income households living in HUD-assisted housing and more-segregated affordable housing options.<sup>13</sup>

We then rank entitlement jurisdictions based on their relative performance on each metric. Within a jurisdiction, we examine the ranking order for each metric to determine how consistently they are across metrics. Because HUD does not detail the specific metrics or methodology it will use to produce scores for jurisdiction rankings, it is impossible to know precisely how the nation’s entitlement jurisdictions might perform under HUD’s proposed rule. However, existing data provide opportunities to explore how omitting or including simple metrics of segregation and racial disparities can alter rankings.

It is important to note that we create sample rankings to mirror HUD’s proposed approach, but we do not endorse a national ranking system for AFFH. Ranking may inaccurately create the perception that jurisdictions that perform relatively well compared with others can be relieved of their responsibility to address segregation and discrimination. In practice, rankings relative to other jurisdictions—particularly using aggregate metrics that do not describe housing access for protected classes—is not evidence that racial segregation or discriminatory practices do not persist. Entitlement jurisdictions should be assessed individually for their progress toward meeting the Fair Housing Act’s goals, with their progress tracked over time using metrics that resonate within unique local contexts. Our primary goal here is to illustrate that race-neutral metrics might reflect a different level of performance compared to metrics that capture segregation and racial disparities in access to affordable housing.

### *Removing Race from AFFH Obscures Local Complexity and Evidence of Unequal Access to Affordable Housing*

In most entitlement jurisdictions, the race-neutral severe housing cost burden metric did not fully reflect the local landscape of housing market challenges or successes. In 90 of the 100 largest entitlement jurisdictions, the rankings according one or more of our comparison metrics differed by 25 positions or more from the rankings based on the aggregate severe housing cost burden metric. The shifts placed some entitlement jurisdictions into higher-performing rankings, and some into lower-performing rankings. In only

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<sup>10</sup> Conceptually, the dissimilarity index measures the percentage of a group’s population that would have to move for each neighborhood to have the same percentage of that group as the metropolitan area overall. The AFFH-T data uses a scale from 0 to 100, where 0 means complete integration and 100 means complete segregation.

<sup>11</sup> R/ECAPs are defined by racial/ethnic group concentration threshold and a poverty threshold. R/ECAPs have a nonwhite population of 50 percent or higher and have a poverty rate that either exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever is lower. More details on this measure are available online, accessed March 4, 2020, [https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-\(AFFHT0004a\)-March-2018.pdf](https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-(AFFHT0004a)-March-2018.pdf).

<sup>12</sup> Federally assisted rental housing types considered for this metric are public housing, Section 8 project-based housing, Housing Choice vouchers, and other multifamily housing. Low Income Housing Tax Credit units are excluded from this analysis because they tend to serve a higher-income population than the other assisted housing types do.

<sup>13</sup> Not all sampled entitlement jurisdictions contain a census tract designated as a R/ECAP. In those cases, jurisdictions have a missing value for the percent of occupied assisted housing units in R/ECAPs. Four entitlement jurisdictions in the sample – Hamilton County, OH; Jefferson County, AL; Lancaster County, PA; and Tarrant County, TX—contained less than half of a census tract designated as a R/ECAP, and we therefore treat these as missing values for this metric. These jurisdictions are also excluded from the ranking. With 27 missing values in the ranking, we set the highest performing entitlement jurisdiction as rank 1 and the lowest performing as rank 73. Interpretations of this ranking with a narrower range relative to the other rankings should be done with caution.

ten entitlement jurisdictions were the rankings based on the race-neutral metric consistently within 25 positions of the rankings for all available comparison metrics.

In many entitlement jurisdictions, performance based on the additional selected metrics reflected more complex local dynamics than the race-neutral metric communicated. Seven entitlement jurisdictions appeared to be higher-performing—and ranked more favorably—using the race-neutral severe housing cost burden metric than they would have ranked using any of the other comparison metrics.<sup>14</sup> For example, in these seven entitlement jurisdictions, a smaller share of all residents had severe housing cost burden compared with the share of Black or Latino residents with severe housing costs burden. These areas also performed better based on the aggregate metric than they did based on the degree of racial segregation. Presumably, HUD might reward these areas as high performers for affordability relative other entitlement jurisdictions. The seven entitlement jurisdictions tended to have higher shares of white residents than the average for all 100 entitlement jurisdictions (81 percent compared with 54 percent).

Conversely, 13 entitlement jurisdictions appeared to perform worse using the race-neutral metric than using any of the other comparison metrics. In other words, these areas had larger overall shares of severely rent-burdened households overall than they did of Black or Latino severely rent-burdened households, and they ranked more favorably relative other entitlement jurisdictions on racial segregation. However, because they appear to perform more poorly overall, these entitlement jurisdictions would presumably be at risk to be penalized under the proposed rule. These 13 areas tended to have higher shares of residents of color: an average of 53 percent compared with 46 percent for all 100 entitlement jurisdictions.<sup>15</sup>

Considered together, these results suggest that the relationships among metrics of affordable housing access are complex, and aggregate metrics—or a uniform ranking system—cannot accurately reflect that complexity. To further illustrate the potential challenges, we highlight three different entitlement jurisdictions—Portland, Oregon; Dallas, Texas; and St. Louis County, Missouri—where the race-neutral housing outcome masks evidence of disparities in outcomes by race.

## PORTLAND, OREGON

Portland is a predominantly white (72 percent), mid-sized community in the Pacific Northwest. According to American Community Survey (ACS) data, median rent in Portland is higher than the national average, at \$1,187 a month (compared with \$1,023 nationally). The population grew 12 percent between 2010 and 2018, to 653,115 people.<sup>16</sup>

In Portland, the aggregate housing cost burden metric obscures differences for residents of color. Portland ranks 69th out of 100 for the percentage of residents experiencing severe cost burden—meaning nearly a third of all jurisdictions (31) had higher shares of rent-burdened residents. However, Portland is the lowest-performing jurisdiction (ranked 100th) for the percentage of Black residents experiencing severe housing cost burden, and among the lowest-performing jurisdictions (92nd) for the percentage of Latino residents experiencing severe housing cost burden. Interestingly, Portland ranks relatively well in racial segregation; it is the 4th least-segregated jurisdiction in our sample. These statistics reflect the need for larger discussions locally about access to affordable housing for people of color in Portland, and how best to capture disparities by race/ethnicity or other protected classes. Figure 1 illustrates how Portland's rankings change when looking at the percent of all households with severe housing cost burden versus the comparison metrics.

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<sup>14</sup> These seven are Allegheny County, Chester County, and Lancaster County, PA; Dakota County, MN; Jefferson County, AL; Hamilton County, OH; and Louisville, KY.

<sup>15</sup> These 13 are Boston, MA; Detroit, MI; Long Beach, Orange County, San Diego County, and San Francisco, CA; Miami-Dade County, Orange County, and Pasco County, FL; Milwaukee, WI; Pierce County, WA; Virginia Beach, VA; and Tucson, AZ.

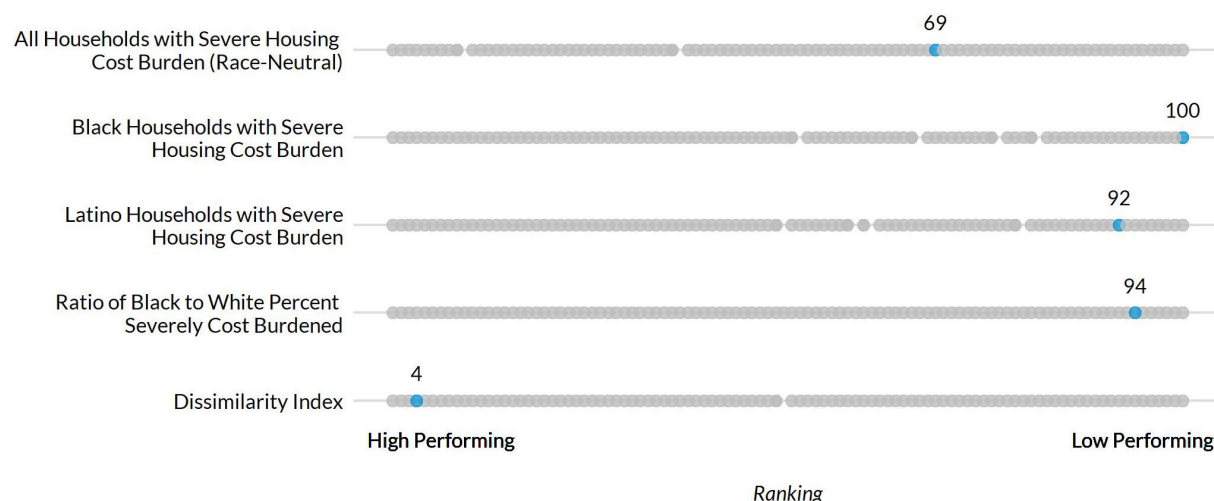
<sup>16</sup> Median gross rents and rates of population growth are from the ACS five-year estimates (2014–18), accessed March 6, 2020, <https://www.census.gov/quickfacts/>.

Further evidence of the need to disaggregate by race and ethnicity in Portland is evidenced by a 2018 report<sup>17</sup> from the Fair Housing Council of Oregon that found evidence of racial discrimination in the rental market—including Black residents being told about higher rental prices and fewer units than their white counterparts. Assessing the race-neutral metric alone risks overlooking the experience of Black and Latino communities hit hardest by the lack of affordable housing, and it obscures the need for affirmative metrics to understand and address these disparities.

FIGURE 1

### Variations in Performance between Race-Neutral Metrics and Metrics Disaggregated by Race and Ethnicity for the Portland, OR, Entitlement Jurisdiction

One dot represents one entitlement jurisdiction



**Source:** Jurisdiction-level data from the AFFH-T Data and Mapping Tool for February 2018.

**Note:** Ranking for the percentage of occupied assisted housing units in R/ECAPs is not displayed because the Portland entitlement jurisdiction does not contain a census tract designated as a R/ECAP.

### ST. LOUIS COUNTY, MISSOURI

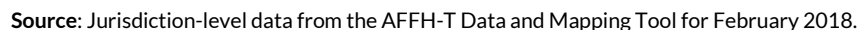
St. Louis County is a predominantly white (68 percent), medium-sized midwestern community. The 2018 population for the county was approximately one million residents, and the population remained constant between 2010 and 2018. St. Louis County is located west of the city of St. Louis and contains the towns Florissant and Chesterfield. The median gross rent in 2018 was below the national median (\$957 compared with \$1,023).

The race-neutral rent burden metric suggests that St. Louis is performing relatively well based on overall affordability. The jurisdiction ranks 20th for the percentage of all residents experiencing severe housing cost burden—meaning the remaining 80 entitlement jurisdictions had higher proportions of households experiencing severe rent burden (figure 2). However, disaggregated data suggest the 25 percent of St. Louis County residents who are Black are far more likely to experience severe housing cost burdens. St. Louis County ranks 46th in the share of Black households with severe housing cost burden and 100th in the ratio of Black to white families experiencing severe housing cost burden. One in four Black residents experience severe housing cost burden, compared with just one in ten white residents.

<sup>17</sup> The 2018 report on fair housing in Portland is available online, accessed March 9, 2020, <https://beta.portland.gov/sites/default/files/2019-12/2018-fair-housing-report.pdf>.

FIGURE 2

One dot represents one entitlement jurisdiction



## DALLAS, TEXAS

Based on the race-neutral severe housing cost burden metric, Dallas ranks 57th of 100 entitlement jurisdictions, marking it with mid-range performance. However, other metrics reveal the extent of Dallas's residential segregation and indicators that poverty is concentrated in a subset of neighborhoods.<sup>19</sup> Dallas ranks 90th on the dissimilarity index, meaning it is one of the most segregated entitlement jurisdictions in the sample, and 61st out of 73 in the share of assisted housing units located in racially and ethnically concentrated areas of poverty (figure 3). HUD's AFFH data show that in 2018, 34 percent of Dallas's occupied assisted housing units was within the city's R/ECAP neighborhoods. The location of public housing,

<sup>19</sup> See a 2011 report on economic and racial segregation in Dallas, accessed March 9, 2020,

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- **The proposed approach limits local jurisdictions' ability to measure and track progress.** Under the proposal, jurisdictions must "submit at least three measurable, concrete goals it plans on reaching the upcoming years or obstacles to fair housing choice it plans to address within its scope of influence." But, with a potentially narrow set of metrics prescribed at the federal level, jurisdictions may have limited ability to examine variations in housing access by protected classes. It is unclear whether jurisdictions will have the capacity and tools to identify where the action is most needed or to consistently track their progress over time toward fulfilling their identified goals. Under this proposed rule, communities are at risk of taking actions that could further limit fair housing access for disadvantaged populations and lack the tools or mandate to measure the impacts of those actions on vulnerable groups.
- **The proposed approach limits local engagement and autonomy.** HUD proposes to organize jurisdictions into six categories<sup>20</sup> based on a combination of housing market tightness and population change characteristics, and then rank jurisdictions within these categories. These characteristics are important to understanding the contextual challenges and opportunities facing jurisdictions, but they do not reflect other important local factors that may be important to understanding housing market dynamics and vary widely by jurisdiction. For example, historical context, industry mix, age distribution of residents or housing stock, and the size and characteristics of disadvantaged populations, among others are important local considerations in determining what goals to target and what approaches might work best to affirmatively further fair housing. The proposed rule suggests that HUD will allow some process for jurisdictions to contest or explain their rankings. But jurisdictions may have limited tools available to them to support this process, it is unclear what might be accepted as sufficient evidence, and it is unclear if the process will allow local housing or civil rights advocates to demonstrate omissions of evidence of local patterns of segregation or discrimination.

In conclusion, we recommend that HUD retain the more robust data and community-driven process already included in the 2015 AFFH rule. Our specific recommendations are as follows:

- **Retain measures of housing access for protected classes.** As noted, aggregate measures of housing market characteristics cannot accurately reflect progress toward fair housing goals or the complexity of unique local contexts. It is vital that federal and local agencies use detailed, disaggregated data at the neighborhood (e.g. census tract) level to describe housing access for protected groups and to accurately assess entitlement areas' progress.
- **Reject a national ranking system.** As noted, a national ranking system—particularly one that relies on incomplete measures of local housing market dynamics—can be misleading. Jurisdictions should be assessed individually, through a process that encourages local engagement and uses measures that resonate in diverse local contexts. Ranking jurisdictions based on their relative performance according to narrowly defined metrics selected federally will provide inaccurate information for federal or local decisionmaking, and it risks rewarding or penalizing jurisdictions based on flawed conclusions about their performance.
- **Continue and expand the use of current AFFH data tools.** HUD invested considerable federal resources to build the AFFH-T data tools, including data gathered from multiple sources that are available nationally, raw data files, and a customizable online mapping tool. The AFFH-T was designed and built to ensure jurisdictions as well as the public are empowered to map and analyze local segregation patterns, racially and ethnically concentrated areas of poverty, assisted housing locations, concentrations of housing cost-burdened households, the areas where people with

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<sup>20</sup> The six categories the proposed rule plans to use are jurisdictions with population growth and tight housing markets, jurisdictions with population growth and loose housing markets, jurisdictions with population decline and tight housing markets, jurisdictions with population decline and loose housing markets, states with significant population growth, and states without significant population growth.

disabilities live, and areas where people of different races and national origins reside. Eliminating their use for AFFH wastes this valuable resource and shifts the power and capacity to understand local housing characteristics from the local to the federal levels. We recommend that HUD update the existing AFFH data on an ongoing basis and continue to provide and apply these tools for public use and to document and address issues related to fair housing.

We include the data used in our analysis on the following two pages. These data and notes about the data are available for download at <https://www.urban.org/research/publication/public-comment-us-department-housing-and-urban-developments-proposed-rule-affirmatively-furthering-fair-housing>.

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Entitlement jurisdiction	State	Population	Pct white	Pct all severe	Rank_all_ severe	Pct_Black_ severe	Rank_Black_ severe	Pct_Latino_ severe	Rank_Latino_ severe	Dissim_ index	Rank_ dissim	Pct_occ_ recap	Rank_occ_ recap	Ratio_bw_ severe	Rank_ratio_ bw_severe
Albuquerque	NM	545,791	42.1	15.9	45	22.9	44	18.6	22	33.6	27	16.62	33	1.74	52
Allegheny County	PA	854,463	87.7	11.2	3	22.3	35	22.1	54	41.3	54	5.08	13	2.2	98
Anne Arundel County	MD	499,184	73.6	13.6	19	17.9	10	22	53	39.1	51			1.49	24
Atlanta	GA	420,159	36.2	21.4	86	28.4	83	16.9	11	66.5	100	43.13	68	2	86
Austin	TX	813,626	49.6	18.4	64	24.7	58	23.2	66	43.1	59	18.35	38	1.64	36
Baltimore	MD	620,961	28	21.4	85	24.5	57	19.7	31	63	94	32.22	59	1.55	30
Baltimore County	MD	805,029	62.7	14.6	32	17.5	6	19.7	30	51.3	79			1.33	11
Bergen County	NJ	905,116	62.5	21.2	84	25.1	62	26.8	84	35.9	35			1.28	7
Boston	MA	617,594	47	21.9	92	26.4	74	25.8	79	51.2	78	30.97	55	1.42	19
Bucks County	PA	470,514	89.3	13.5	16	18.9	15	19.1	26	24.3	1			1.43	20
Charlotte	NC	735,984	45.2	16.5	50	22.5	41	21.1	41	48.3	73	25.46	47	1.93	77
Chester County	PA	498,886	82.1	13.5	17	23.6	49	18.8	24	35.9	36	12.7	27	1.83	67
Chicago	IL	2,695,741	31.7	22.8	93	29.7	86	25.7	78	62	93	35.23	64	1.81	64
Clark County	NV	1,112,526	43.1	18.5	65	26.5	75	21.2	42	28	10	8.76	21	1.64	35
Cobb County	GA	688,118	56.3	14.9	40	21.3	30	24	70	39.1	49	0.26	3	1.93	75
Colorado Springs	CO	417,335	70.8	14.7	34	20.9	28	21.6	45	27.6	8	1.4	7	1.62	34
Columbus	OH	776,297	60.5	17.2	55	23.8	51	21	39	42.8	56	28.88	52	1.65	37
Contra Costa County	CA	696,551	49	18	61	28.1	81	22.6	60	44.1	63			1.79	59
Cook County	IL	1,691,339	56.7	18.2	63	24.7	59	21.9	48	53.1	84	3.25	10	1.58	32
Cuyahoga County	OH	622,447	76.7	12.9	9	20.4	25	14.6	4	52.4	81			1.77	55
Dakota County	MN	417,216	82.4	11.1	2	21.4	31	19.4	27	24.8	3			2.13	96
Dallas	TX	1,197,588	29	17.5	57	23.8	51	17.7	16	58.2	90	33.86	61	1.8	62
De Kalb County	GA	612,118	25.6	19.8	76	22.8	43	24.2	74	63.6	97	9.37	22	1.72	46
Denver	CO	600,158	52.2	17.3	56	27.6	78	22.4	56	48.9	75	11.7	26	1.96	81
Detroit	MI	713,777	7.8	28.5	100	29.8	87	23.6	69	53	83	60.9	73	1.45	21
District of Columbia	DC	601,723	34.8	18.9	68	24.1	56	22.6	58	63.3	95	56.04	71	1.93	76
Du Page County	IL	776,070	70.8	14.3	27	22.5	40	19.6	29	33.5	25			1.72	47
El Paso	TX	649,193	14.2	13.6	18	15.2	3	14.6	3	37.9	45	33.43	60	1.74	51
Fairfax County	VA	1,104,291	54.7	11.9	5	16	5	21.9	52	30.5	16	5.22	14	1.84	68
Fort Worth	TX	741,759	42.1	15.1	41	23.2	47	15.7	7	45.5	65	26.15	48	2.07	93
Franklin County	OH	427,601	80.3	10.5	1	17.6	7	13.5	1	31.8	24	5.72	15	1.77	56
Fresno	CA	496,113	30.8	23.1	94	33.4	97	27.2	88	38.8	48	56.62	72	1.87	71
Gwinnett County	GA	811,112	44.3	16.7	51	20.4	26	27.3	90	36.1	37	0.47	5	1.86	69
Hamilton County	OH	456,890	78.1	13	11	22.3	37	19.5	28	52.2	80			2.02	89
Harris County	TX	1,757,909	40	13	12	18.4	13	16.8	10	44.7	64	15.07	30	2.06	92
Hennepin County	MN	511,682	75.5	13.2	15	25	61	20.7	36	39.4	52	0.02	1	2.15	97
Hidalgo County	TX	419,305	6	14.6	30	7.6	1	15.5	5	39.1	49	45.1	70	1.15	2
Hillsborough County	FL	893,519	56.5	16.8	52	23.4	48	22.6	58	31.1	20	17.98	35	1.72	45
Honolulu	HI	953,207	19.1	18.6	67	32.3	93	27.5	91	37.5	43	13.28	28	1.59	33
Houston	TX	2,101,908	25.8	17.7	59	22.9	45	19.8	32	57.2	88	25.28	46	1.79	60
Indianapolis	IN	829,686	59.2	16.5	49	24	54	26.2	83	47.1	70	19.31	39	1.95	80
Jacksonville-Duval County	FL	862,838	56.5									23.03	44		
Jefferson County	AL	442,903	68.9	17.9	60	25.9	68	20.7	37	37.2	41			1.82	65
Kansas City	MO	459,785	54.9	12.2	7	18.2	12	17.5	14	48.5	74			1.79	58
King County	WA	923,027	67.5	16.8	53	25.6	66	18.5	19	53.5	85	26.61	49	2.03	90
Lake County	IL	618,662	71.5	14.7	35	25.3	63	21.5	44	30.7	17			1.9	72
Lancaster County	PA	460,140	90.5	15.4	42	24.1	55	18.9	25	38.1	46	0.52	6	1.66	39
Las Vegas	NV	584,006	48.2	12	6	19.4	18	20.9	38	30.8	18			1.68	43
Long Beach	CA	462,257	29.3	19.3	71	29.3	84	22.7	62	37.3	42	21.2	40	1.79	61
Los Angeles	CA	3,792,622	28.7	24.3	96	32.8	95	28	94	55.8	87	30.17	54	1.73	48
Los Angeles County	CA	2,461,805	28.4	28.4	99	33.7	98	32.3	100	58.5	91	21.58	41	1.36	13
			29.5	21.1	83	26	70	24.8	76	53.9	86	4.7	12	1.49	25

Entitlement jurisdiction	State	Population	Pct white	Pct all_severe	Rank_all_severe	Pct_Black_severe	Rank_Black_severe	Pct_Latino_severe	Rank_Latino_severe	Dissim_index	Rank_dissim	Pct_occ_recap	Rank_occ_recap	Ratio_bw_severe	Rank_ratio_bw_severe
Louisville-CDBG	KY	542,290	76.9	13.9	24	22.3	36	20	33	34.2	31	42.81	67	1.97	84
Maricopa County	AZ	499,103	66	13.8	21	19.4	19	18.3	17	42.6	55	0.09	2	1.52	28
Memphis	TN	651,698	28.2	21.7	90	26.3	72	26	82	63.4	96	44.44	69	1.91	74
Mesa	AZ	438,435	64.5	16.2	48	26.1	71	22.6	60	35.5	33	9.57	23	1.86	70
Miami-Dade County	FL	1,506,668	17.1	25.6	98	28.1	81	27.3	89	42.8	58	22.76	43	1.45	22
Milwaukee	WI	594,544	37	23.7	95	32.4	94	24.5	75	59.5	92	31.35	57	1.98	85
Monmouth County	NJ	509,902	78	18.6	66	21.6	32	29.3	96	33.6	29			1.22	4
Montgomery County	PA	623,362	80.7	13.2	14	19.4	20	21.3	43	28	11			1.57	31
Montgomery County	MD	901,692	49.5	14.5	29	21.7	33	23.2	67	36.3	39	2.11	9	2.05	91
Morris County	NJ	420,881	79.7	15.6	44	20.2	24	24.1	72	27.1	6			1.35	12
Nashville-Davidson	TN	626,681	57.4	15.9	46	22.4	38	22.3	55	44	62	31.05	56	1.76	53
Nassau County	NY	1,249,305	64.4	20.2	78	24.9	60	31.2	98	50.6	77			1.42	18
New Castle County	DE	467,595	66.7	12.9	9	17.8	9	25.8	79	30.9	19			1.66	41
New York	NY	8,175,133	33.3	25	97	26.8	76	29.5	97	63.6	98	34.51	62	1.3	10
Oakland County	MI	920,373	78	13.9	22	22.4	39	17.3	13	42.8	57	29.91	53	1.74	50
Oklahoma City	OK	579,998	56.9	14.1	25	24	53	18.5	20	36.3	38	26.86	50	2.21	99
Omaha	NE	424,440	68.7	14.6	31	25.9	69	18.5	18	46.4	68	23.96	45	2.12	95
Orange County	CA	566,935	57.8	19.5	73	20.6	27	22.8	65	33.6	26			1.09	1
Orange County	FL	814,968	46	21.8	91	29.8	88	25.8	81	35.7	34	1.87	8	1.71	44
Palm Beach County	FL	840,161	57.8	21.6	89	32	92	26.8	85	47.7	72	17.2	34	1.74	49
Pasco County	FL	443,183	80.3	14.8	38	19.6	21	20.1	34	28.4	12	0.43	4	1.39	15
Philadelphia	PA	1,526,006	36.9	21.6	88	23.8	50	31.8	99	64.6	99	36.38	65	1.39	14
Phoenix	AZ	1,447,134	46.6	18	62	26.8	76	22.5	57	52.4	82	37.43	66	1.81	63
Pierce County	WA	514,611	75.3	14.1	26	19.3	17	16.4	9	27.8	9			1.45	23
Pima County	AZ	459,251	64.1	12.9	8	15	2	17.3	12	38.6	47	34.62	63	1.26	6
Pinellas County	FL	486,426	83.8	17.1	54	32.9	96	21.9	51	27.1	5			2.01	87
Polk County	FL	423,858	67.1	13.9	23	22.3	34	21.1	40	29.5	14	6.12	17	1.94	79
Portland	OR	583,890	72.3	19.2	69	36	100	27.6	92	26.9	4			2.1	94
Prince George's County	MD	795,092	13.1	17.6	58	17.6	8	21.6	47	46	66	4.53	11	1.22	3
Prince William County	VA	454,096	48.4	13.1	13	15.6	4	21.9	49	31.3	21			1.78	57
Riverside County	CA	967,067	41.7	20.6	80	29.6	85	23.3	68	34	30	8.05	20	1.66	40
Sacramento	CA	466,488	34.5	21.6	87	32	91	27	87	34.9	32	15.56	32	1.97	83
Sacramento County	CA	651,179	57.4	19.3	70	30.6	90	24.1	73	33.6	28	17.98	36	1.83	66
San Antonio	TX	1,327,382	26.8	14.8	36	20	23	15.8	8	43.4	60	21.61	42	1.67	42
San Bernardino County	CA	699,215	43.7	19.7	75	29.9	89	22.7	64	46.1	67	10.11	24	1.76	54
San Diego	CA	1,307,403	45.2	21	82	27.6	79	27	86	47.2	71	11.24	25	1.5	26
San Diego County	CA	621,988	59.8	20.9	81	25.5	65	25.5	77	31.8	23	7.68	19	1.29	8
San Francisco	CA	805,235	41.9	19.6	74	26.3	73	24	71	37.2	40	31.6	58	1.52	27
San Jose	CA	952,821	28.9	19.4	72	25.3	64	27.7	93	43.8	61	14.02	29	1.66	38
Seattle	WA	608,659	66.3	16.1	47	27.9	80	20.1	35	37.8	44	15.34	31	1.97	82
Snohomish County	WA	549,958	75.1	14.8	36	17.9	11	21.9	49	27.3	7			1.3	9
St. Louis County	MO	912,202	68.2	13.6	20	23.1	46	18.5	21	57.2	89	7.49	18	2.23	100
Suffolk County	NY	729,653	78.3	20.2	79	35.9	99	29.2	95	29	13			1.93	78
Tarrant County	TX	662,379	68.5	11.3	4	18.9	16	14.2	2	30.2	15			1.9	73
Tucson	AZ	521,012	47.5	20	77	22.7	42	22.7	63	41.1	53	18.06	37	1.25	5
Virginia Beach	VA	437,994	64.5	15.5	43	19.9	22	17.6	15	31.5	22			1.4	16
Washington County	OR	433,065	70.1	14.7	33	21.1	29	21.6	46	24.5	2	6.1	16	1.53	29
Wayne County	MI	530,082	74.3	14.9	39	25.6	66	15.5	6	49.1	76	27.41	51	2.01	88
Will County	IL	487,418	71.6	14.4	28	18.5	14	18.6	23	46.5	69			1.41	17

**Note:** More information about the data, including definitions of metrics, is available at <https://www.urban.org/research/publication/public-comment-us-department-housing-and-urban-developments-proposed-rule-affirmatively-furthering-fair-housing>.