



OPPORTUNITY FOR ALL

Federal Tools to Create Places of Opportunity for All

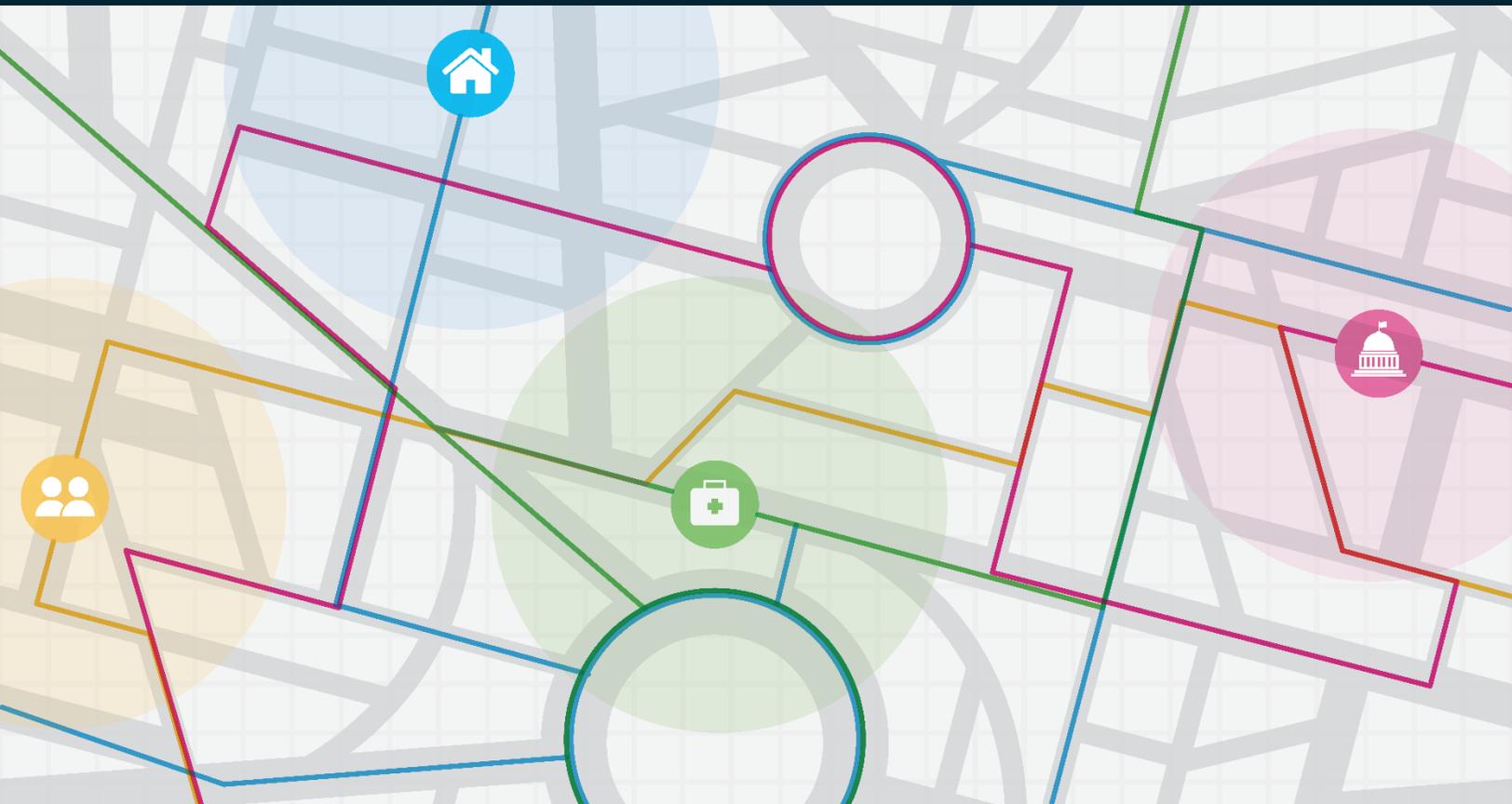
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The **Opportunity for All** project is based on a simple premise: every family should live in a neighborhood that supports their well-being and their children's ability to thrive. But today, too many families, particularly families of color, live in neighborhoods that have suffered from decades of disinvestment, have been displaced from neighborhoods that are revitalizing, and are excluded from neighborhoods with opportunity-enhancing amenities. Racist public policies have created and reinforced this uneven landscape, but better policies can instead support fairer and more just access to opportunity. The federal government has a particularly important role because of the scale of its resources and its ability to level the playing field across places.

In this essay series, Urban Institute scholars, community leaders, and national experts are working together to explore how the federal government can help all neighborhoods become places of opportunity and inclusion. Although these essays address multiple policy areas, they all aim to end the systems that tie Americans' chances of success to their race or the place they grow up.



Over more than a century, the federal government has played a central role in creating and perpetuating racially segregated communities throughout the country. It has done so by blocking access to well-resourced and opportunity-rich neighborhoods for people of color and contributing to the disinvestment and neglect of neighborhoods in which people of color live. Today, separate and unequal neighborhoods divide our country and drive pervasive inequities and injustices in safety, education, health, and employment.

The essays in the Opportunity for All series offer six evidence-based ideas for federal action that would restore the vitality of disinvested neighborhoods, prevent displacement from revitalizing communities, and expand access to communities already rich with opportunity. The essays include ideas to strengthen the federal role in

- investing in community-driven public safety,
- attracting new streams of community development finance through a corporate compact,

- creating a nationwide infrastructure for housing preservation,
- preventing evictions through a renters' housing-stability program,
- lifting local zoning barriers to fair and affordable housing, and
- scaling up housing mobility programs to improve low-income families' meaningful access to opportunity-rich neighborhoods.

These ideas by no means constitute an exhaustive agenda of essential federal actions for dismantling the legacy of racial segregation. Real progress will also require federal support for solutions to deep injustices in health, education, and environmental hazards. It will call for equitable responses to emerging challenges such as climate change and the accelerating automation and contingency of work. And it will demand that people too-long excluded from decisions about their lives and communities can exercise real voice and power.

Given the scale and complexity of the federal government, progress in areas such as the six discussed in this series could inadvertently be undermined by other policy choices that fail to consider place, race, and access to opportunity. Today, the federal government not only underfunds equity goals in housing, education, and access to good jobs; it also undermines them by allowing state and local choices about land use and taxation that sustain inequities and drive up the costs of ameliorating them.¹ The federal government also subsidizes sprawling and unsustainable development patterns that undermine racial equity and urgent climate action as well as the strategies that would link the two.² For many communities across the country (and the people who live in them), this is both unfair and self-defeating. How can the federal government ensure that its policies and actions consistently advance a place-conscious approach for dismantling structural racism and creating sustainable and equitable pathways to economic mobility across American communities?

Here we offer three tools the federal government can use to expand access to opportunity through its policies and investments while leveraging local and state capacities to innovate and adapt to new equity challenges. Each tool aims to help sustain national commitment over the long term.

- **Vigorously enforce the long-neglected statutory mandate to affirmatively further fair housing (AFFH)** by requiring local and state governments to develop place-conscious plans that lift barriers to opportunity.
- **Implement a place-conscious equity review process for all major discretionary spending and new federal policy designs** that aligns agencies, programs, and spending to advance equitable placemaking.

- **Launch a “race-to-the-top” competition that rewards the boldest regional and state equitable development strategies** with substantial new resources for housing, transportation, and other infrastructure investments.

These are not competing alternatives; rather, the federal government can use them in combination to catalyze and sustain a national commitment to equity and inclusion in the places we live. If all three tools were implemented, they could raise the “floor” for local plans and investments, reward innovative regions and states that raise the “ceiling” of what is possible, and align federal agencies’ commitments to unwinding the legacy of separate and unequal neighborhoods.

Vigorously Enforce the Mandate to Affirmatively Further Fair Housing

In 1968, Congress adopted the federal Fair Housing Act, which bans racial discrimination in all housing transactions. The act went further as well, requiring that federal, state, and local governments take steps to reverse racial segregation and concentrated poverty and undo their pernicious effects on protected groups as well as society at large.³ Successive administrations failed to adhere to this mandate, but in 2015, the Department of Housing and Urban Development (HUD) finally published a rule interpreting the Fair Housing Act’s AFFH requirement and provided guidance, tools, and resources to local communities to help them comply.⁴

An essential first step for effectively enforcing the AFFH mandate is to require and enable cities, counties, and states to develop locally relevant plans that effectively address the racial inequities caused by both public policies and private discrimination. Under the 2015 HUD rule, states and local governments that receive federal funds for housing and community development were required to identify and address the barriers that exclude and isolate people of color (as well as other protected groups, such as families with children and people with disabilities) and that undermine the well-being of the neighborhoods in which they live, and to create plans to overcome these barriers.⁵

Alongside the 2015 rule, HUD provided data, resources, and questions that states and localities used to identify the primary factors undermining fair housing outcomes in their communities and to set goals for addressing those factors. Crucially, the rule also required that local governments engage constituents and affected communities through robust public participation and provided guidance on how to ground plans in “local knowledge” about barriers to fair housing and the housing needs of protected groups.⁶ The plans initially submitted to HUD identified specific actions and investments aimed at advancing four interconnected goals:

- Overcoming historic patterns of residential segregation and promoting more integrated neighborhoods
- Reducing concentrations of poverty
- Narrowing inequities in access to community assets and in exposure to environmental hazards
- Responding to the disproportionate housing needs among people of color and other protected groups⁷

Just as HUD had begun implementing the AFFH rule, the Trump administration suspended and then terminated it.⁸ It also deleted all data and resources related to fair housing planning from the HUD website.⁹ Some communities have forged ahead with robust fair-housing planning, and some states have stepped up to adopt their own AFFH requirements and processes.¹⁰ But today, some local communities continue to segregate by race and concentrate poverty through their policies and practices, and all local communities lack federal guidance, resources, and incentives to do better.

To fulfill the Fair Housing Act's mandate and its deferred promise of "truly integrated and balanced living patterns," HUD can reinstate the 2015 rule and restore the tools and resources that communities need to develop and implement effective, community-informed, data-driven plans. But the agency can and should also improve and rigorously enforce the rule. It should provide adequate resources, guidance, and technical assistance to ensure every community is well-supported in planning and in engaging its residents; expand enforcement capacity to ensure every plan is reviewed and complies with the rule before funds are released; encourage regional collaboration among local governments in preparing plans; and build knowledge about what works by sharing completed plans publicly, identifying best practices, and supporting learning networks across grantees. Moreover, furthering fair housing should not be considered only HUD's purview; rather, it should be a priority for the entire federal government. Ample experience and evidence exist to inform "AFFH 2.0."¹¹

To be meaningful and effective, fair-housing plans must establish locally relevant outcome goals and define measures for tracking progress. At their best, these goals will factor how people in communities envision and value equity, recognizing that how government leaders envision and value equitable development can differ greatly from how the community prioritizes and values that development. Moreover, a concise set of standardized metrics that are applied across jurisdictions and over time could significantly help track and evaluate the nation's progress. To define such metrics, we return to the basic premise that every family should be able to live in a neighborhood that supports their well-being and boosts their children's chances to thrive. That would mean that more neighborhoods in every region have the attributes that support family well-being and boost children's

long-term success and that more families of color, who historically have been excluded from such neighborhoods, have meaningful access to them.

The concept of a neighborhood opportunity index is not new, and a substantial body of research has been built over recent decades to support it.¹² We envision a neighborhood “score” based on attributes that evidence indicates support family well-being and children’s long-term success.¹³ Such a neighborhood opportunity index could include measures of

- safety and just policing (including effective partnerships with health, mental health, and other social supports);¹⁴
- quality schools and early-learning programs;¹⁵
- decent and affordable housing;¹⁶
- health-promoting environments (such as proximity to grocery stores and the absence of environmental toxins in the air, water, and soil);¹⁷
- access to financial services (such as a bank account and credit lines);¹⁸
- access to jobs (i.e., proximity to employment centers and access to affordable and reliable transportation);¹⁹ and
- access to recreational and cultural facilities.

Note that this neighborhood opportunity score would *not* include measures of residents’ race or income. It aims to measure what a neighborhood offers its residents, not who lives in it. In other words, crucially, it would not assume that a neighborhood occupied by people of color is by definition distressed. A summary score could be used to assess whether the share of residential neighborhoods offering low opportunity scores declines and the share with high scores grows. And, just as importantly, a summary score could assess whether historically excluded groups are gaining access to such neighborhoods.

Implement a Place-Conscious Equity Review

Federal grants provide major sources of funding for states and localities, including to support national goals for housing and community development, transportation and transit access, and environmental sustainability.²⁰ The primary granting agencies that support these goals—HUD, the Department of Transportation, and the Environmental Protection Agency—already require local grantees to identify potential negative impacts of funding requests and report the relative share of funding that is invested

in low-income communities and communities of color. In many cases, however, state and local governments do not comply with these federal requirements, and they are not held accountable for investments that either fail to address disparities or that widen them.²¹ This is particularly the case for investments in infrastructure that could catalyze, promote, and support equitable development in communities of color and low-income communities.

The federal government should adopt a robust equity-review process that requires state and local grantees to look beyond potential negative impacts and deploy their federal funding to proactively reduce disparities.²² This approach builds on the equity requirements of the Civil Rights Act, the National Environmental Protection Act, the Fair Housing Act, and Executive Order 12898 that collectively require recipients of federal funds for housing, transit and environmental infrastructure to identify disproportionate adverse impacts on communities of color and address these impacts “to the greatest extent allowable by law.”²³ An equity review can cure the deficits and enhance the efficacy of these mandates, providing a streamlined and transparent process to deploy federal resources in ways that dismantle racial segregation and promote equitable development.

A place-conscious equity review would focus on disparities in the physical, social, and human environment (e.g., housing security and affordability, transit access, civic participation, and water equity) that underlie segregation, exclusion, displacement, and disinvestment.²⁴ The review would require disaggregation of data by both race and geography. And it would be standardized across agencies that provide funding for placemaking activities (both formula and discretionary funding). This would support agency-level evaluations of place-based investments toward equitable communities as well as assessments of how funds dispersed by different federal agencies work together to create more equitable development patterns.

In conjunction with a formal equity review requirement, we suggest the federal government build on the Obama administration’s Sustainable Communities Initiative and its model of joint agency reviews by creating a new interagency council to center place-based equity in federal urban policy and practice.²⁵ With support from the White House and the Office of Management and Budget, the interagency council would align agencies’ equity reviews and funding streams to support investments that provide the resources and opportunities that communities and their residents need to thrive. The council would also be responsible for developing compliance and enforcement tools across federal agencies with placemaking governance authority. It would play an important role in the coordinated and comprehensive enforcement of civil rights policies for these agencies.

The equity-review process and the interagency council should include federal agencies that support arts and culture. This would foster opportunities to identify and curate communities' historical narratives and cultural identities and to leverage arts and culture investments in placemaking activities. Building on promising past practices and programs, agencies such as the National Endowment for the Humanities and the National Endowment for the Arts could strategically connect cultural investments to infrastructure investments. The recent removal of Confederate monuments in cities across the country provides evidence of the cultural harm, both inadvertent and intentional, that can be perpetrated against communities in placemaking.²⁶ Finally, including arts and culture in the equity-review process would support adherence both to civil rights policies and to principles of equitable development by incentivizing local governments to create additional innovative ways for communities to both bond and speak out.

The interagency council should be staffed and funded adequately to collect standardized, disaggregated, place-based equity data from local jurisdictions and to prepare an annual report of how federal funds are being deployed for equitable placemaking investments. Nations such as Canada, Japan, and Mexico offer models of gender budgeting that can inform the proposed annual reporting.²⁷ Like gender budgeting, one primary goal of the reporting would be to normalize place equity and racial equity in the design, development, implementation, and evaluation of relevant public policies and budgets.²⁸ The United Kingdom publishes a distributional analysis alongside its annual budget and requires all new federal spending proposals to consider their distributional impacts on affected places and affected groups.²⁹ In the United States, an annual report that links federal investment to local opportunities for curing separate and unequal neighborhoods and promoting equitable placemaking could build upon these models.

One major challenge to establishing an equity-review process for federal funding is ensuring the process encourages jurisdictions to prioritize place-based equity without penalizing those that are so poorly resourced they must use federal funding to support basic community services. Most federal grant programs are designed to leverage local or state investment to achieve a target goal or outcome, but this does not happen if funds are instead deployed toward a more pressing community need, such as public health services.³⁰ This is a long-standing issue in public finance, especially for jurisdictions with limited fiscal capacity. An equity-review requirement for both formula and discretionary grants must not cause additional harm to populations that already lack access to basic services by reducing funding to jurisdictions that fail to prioritize equity over other compelling public interests.

Accordingly, the equity review should be just one factor in discretionary funding decisions, requiring local grantees to identify and assess disparity and acknowledge any culpability in

perpetuating inequity and disinvestment. For formula funding, local jurisdictions would be required to report how funds were used and identify investments that failed to meet required equity benchmarks. The review could also explicitly consider local jurisdictions' fiscal capacity. Such a review could at best improve equitable outcomes; at the very least it can change administrative practices in jurisdictions that have been unable or unwilling to prioritize equity in placemaking.

Another likely challenge is that an equity-review requirement may be perceived as too onerous for some communities to navigate without guidance about best and promising practices. Building capacity across agencies and levels of government was a high priority of the Obama administration, and the Partnership for Sustainable Communities offers a great example of how third-party intermediaries can provide technical assistance to local communities to help them shift toward more inclusive and equitable practices.³¹

Launch a “Race to the Top” for Equitable Development

Dismantling the discriminatory legacies of neighborhood exclusion and disinvestment requires fundamental changes to local development patterns and practices, and achieving those changes will take more than big federal spending. Doing so calls for changes in how government spends and, more specifically, what it rewards. As such, the federal government should invest in a bold Race to the Top, or RTT, for equitable development. The idea is to apply the model of reform-contingent aid (the model used for the \$4.35 billion competitive grant program enacted as part of the Recovery Act in 2009) to promote equity in local development regulations, investments, and outcomes.

An RTT would include a two-stage competition in which state and local grant seekers would enact certain threshold reforms on the front end as part of a “contest to qualify.” They would then compete for large federal grants based on how effectively and creatively their strategies promote equitable development. State and local reforms could include for example, more flexible by-right and inclusionary zoning and land-use regulations that allow a wider range of housing types and reduce costly procedural hurdles; tax and other public finance policies that give localities more resources and flexibility; strong affordable-housing preservation and development commitments; and enhanced tenant protections. Federal incentives could even lead some states to rethink and remove prohibitions (preemptions) on local government action to change such policies. By both restoring resources and opportunities in struggling neighborhoods and expanding access to opportunity-rich neighborhoods, these changes would help mitigate the place-based disparities that undermine racial equity and economic mobility.³²

Currently, the federal government ignores state and local drivers of persistent inequities in outcomes for families and children and provides incremental aid as coping money. The approach outlined here would instead strategically encourage jurisdictions to reform the policies and investment decisions that drive inequitable and unsustainable development patterns, and it would reward those reforms with major new public investments that enable communities to make dramatic progress. Moreover, the RTT should encourage localities to collaborate in regional alliances thus mitigating “beggar-thy-neighbor” incentives that favor current inequitable development patterns.³³

The precedents in federal policy for an RTT for equitable development are wide ranging. First, the Obama administration’s education RTT, according to the best empirical evidence, did spur significant policy reforms (even among the “lottery losers”) as intended.³⁴ Crucially, RTTs motivate reform not only through the prospect of new money at scale: they also animate state and local coalitions and provide elected officials with valuable external pressure and political “cover” to break through stalemates and controversies that have sometimes blocked reforms for years or decades. The right incentives from above can in effect create new or stronger constituencies and coalitions to make change happen.

Further, two Obama administration initiatives—the White House Council on Strong Cities, Strong Communities and the Sustainable Communities Initiative—taught us much about building local capacity to use federal funds in more flexible and effective ways and about promoting equity and environmental sustainability goals simultaneously. Innovations included linking affordable housing with transit investments, deploying federal agency staff in city government offices to boost federal aid use where localities lacked staff capacity, promoting more balanced regional growth, and distributing resources more equitably between neighborhoods within a municipality or between municipalities within a region.

The evidence suggests these initiatives had very positive impacts on planning and spurred some local reform in land use and other areas, but the lack of major funding to implement new development plans and to effectively “braid and blend” funding across federal agencies limited these promising impacts.³⁵ These early initiatives were innovative and well designed, but neither program required reforms to the state and local rules that drive development, and neither could offer a game-changing shift in fiscal federalism.

An RTT for equitable development would face several key limitations and challenges. The first is fiscal and economic. Some will claim that the US cannot afford to spend in these ways, especially while the country struggles to recover from the COVID-19 recession and faces funding shortfalls in critical

services. However, the estimated costs of the status quo to our nation's economy (e.g., from lost productivity) run to the trillions each year.³⁶ And these costs will climb steeply absent changes in current development patterns.

Depending on how broad a geographic reach this new program would aim to achieve, an initial commitment of \$5 to \$10 billion would accelerate reform and learning, putting meaningful funding into equitable and sustainable development and rather than just plans. Crucially, if HUD were designated as the lead agency, its funding should not serve as a substitute for more equitable spending through the Department of Transportation, the Environmental Protection Agency, the Federal Emergency Management Agency climate resilience grant program, or other programs. In fact, active braiding and blending of federal funds should be the rule. For example, Federal Emergency Management Agency resilience funding and HUD disaster recovery funding should never work at cross purposes, but sometimes they do. The place-conscious equity reviews and interagency council discussed above would be one way to pursue vital cross-program, cross-agency integration.

The second challenge is more fundamental. Do we know enough about the “right” reforms to urban and regional development to structure the RTT, score state and local proposals, and assess performance? And will enough states permit their local governments to make such reforms? The education policy RTT awarded points to state applicants that enacted certain reforms, such as in teacher evaluation, curriculum standards, and competition between charter schools and traditionally governed public schools. These reforms were not without controversy, but they were reasonably well supported by evidence and were nested within larger categories, such as “great teachers and leaders” and “standards and assessments.”³⁷

The key to solving this second challenge is in delimiting the primary goals of an RTT for equitable development and being confident about the *broad* kinds of rule changes that matter most for meeting those goals and how to structure incentives to create room for reform. In the context of equitable development, an RTT-style funding mechanism could operate particularly well in conjunction with the two other tools discussed here. Vigorous enforcement and explicit outcome measures for AFFH would help define the standards for an equity “floor.” And a place-conscious equity review of major federal funding programs and regulatory actions would illuminate the intended and unintended consequences of current federal policy and new proposals for allocating federal funds. Those complementary innovations would go a long way toward defining ingredients for success, starting with broad categories such as zoning reforms that allow more types of housing and reduce the costs of building them, equitable planning goals and standards, infrastructure investment plans, and property tax or

other revenue reforms. Evaluating whether those policies translate over time into measurable outcomes is entirely possible.

Connecting an RTT funding model to the other innovations discussed in this essay would also compel federal policymakers to reconcile, as needed, any tensions between racial and social equity goals on one hand and goals such as environmental sustainability or inclusive recovery on the other.³⁸ Although a multifaceted funding pot for state and local reform is more complex to explain and implement than a more narrowly focused program (to promote zoning reform, for example), the former may win political support more readily. Using several reform levers to pursue multiple goals, such as racial equity and poverty reduction embedded in climate-smart development, invites a bigger-tent coalition that cuts across generations, income brackets, race, and other differences.

Conclusion

All three of these tools can be shaped to recognize the profound health, economic, and fiscal shocks states and localities have suffered this year. And they respond to the grassroots political mobilization across communities large and small demanding racial equity in policing, in pandemic response and economic recovery, and in climate action. Acting now would also build on the progress made by tenant activists across the income spectrum who have powered a large-scale movement for housing affordability over the past few years.³⁹

The federal government has an opportunity and an obligation to begin dismantling the stubborn structures of separate and unequal neighborhoods. It can deploy its resources and influence to ensure every family can live in a neighborhood that supports their well-being and their children's ability to thrive. Achieving this goal will require sustained commitment, but the time to start is long overdue.

Notes

¹ Solomon Greene and Ingrid Gould Ellen, "Breaking Barriers, Boosting Supply: How the Federal Government Can Help Eliminate Exclusionary Zoning" (Washington, DC: Urban Institute, 2020), <https://www.urban.org/research/publication/breaking-barriers-boosting-supply>; Palma Joy Strand and Nicholas A. Mirkay, "Racialized Tax Inequity: Wealth, Racism, And The U.S. System of Taxation," *Northwestern Journal of Law & Social Policy* (Spring 2020), <https://scholarlycommons.law.northwestern.edu/cgi/viewcontent.cgi?article=1200&context=njlsp>; Xavier de Souza Briggs, Amy Liu, and Jenny Schuetz, "Federal Fiscal Aid to Cities and States Must be Massive and Immediate," Brookings Institution blog, March 24, 2020, <https://www.brookings.edu/blog/the-avenue/2020/03/24/federal-fiscal-aid-to-cities-and-states-must-be-massive-and-immediate/>.

- 2 A large empirical literature documents these rules, incentives, and development patterns. For summative reviews, analysis and discussion, see Xavier de Souza Briggs, “Looking Back and Looking Ahead: CDBG and the Future of Federal Urban Policy,” *Housing Policy Debate*, 24, no. 1 (2014), <https://www.tandfonline.com/doi/abs/10.1080/10511482.2013.865657>; Pietro Nivola, *Laws of the Landscape* (Washington, DC: Brookings Institution Press, 1999); and Gerald Frug and David Barron, *City Bound: How States Stifle Urban Innovation* (Ithaca: Cornell University Press, 2008).
- 3 Solomon Greene and Shamus Roller, “When a Fair Housing Rule Is Not Fair,” *The Hill*, January 7, 2020, <https://thehill.com/blogs/congress-blog/politics/477227-when-a-fair-housing-rule-is-not-fair>.
- 4 Michelle Adams, “The Unfulfilled Promise of the Fair Housing Act,” *New Yorker*, April 11, 2018, <https://www.newyorker.com/news/news-desk/the-unfulfilled-promise-of-the-fair-housing-act>.
- 5 Katherine O’Regan, “Affirmatively Furthering Fair Housing: The Potential and the Challenges for Fulfilling the Promise of HUD’s Final Rule,” in *A Shared Future: Fostering Communities of Inclusion in an Era of Inequality*, edited by Jennifer H. Molinsky, Jonathan Spader, and Christopher Edward Herbert (Cambridge, MA: Joint Center for Housing Studies of Harvard University, 2018), https://www.jchs.harvard.edu/sites/default/files/A_Shared_Future_Chapter_13_Affirmatively_Furthering_Fair_Housing.pdf; Solomon Greene and Erika Poethig, “Creating Places of Opportunity: HUD’s New Data- and Community-Driven Approach,” *Urban Wire*, July 8, 2015, <https://www.urban.org/urban-wire/creating-places-opportunity-huds-new-data-and-community-driven-approach>.
- 6 Vicki Been and Katherine O’Regan, “Public Comment on Docket No. FR-5173-N-15: Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants,” March 6, 2018, https://furmancenter.org/files/NYUFurmanCenter_CommentsAFHDelay_6MAR2018.pdf.
- 7 Justin Steil and Nicholas Kelly, “The Fairest of Them All: Analyzing Affirmatively Furthering Fair Housing Compliance,” *Housing Policy Debate* 29, no. 1 (2019), <https://dusp.mit.edu/sites/dusp.mit.edu/files/attachments/publications/Steil%20Kelly%202019%20The%20Fairest%20of%20Them%20All.pdf>.
- 8 Brett Samuels, “Trump Administration Ends Obama Fair Housing Rule,” *The Hill*, July 23, 2020, <https://thehill.com/homenews/administration/508745-trump-administration-ends-obama-fair-housing-rule>.
- 9 These data and resources have been archived by the Urban Institute and are publicly available at “Data and Tools for Fair Housing Planning,” Urban Institute Data Catalog, accessed October 9, 2020, <https://datacatalog.urban.org/dataset/data-and-tools-fair-housing-planning>.
- 10 For example, seven cities and 15 public housing agencies in the metropolitan Dallas region continue to use their regional fair housing plan (which was still in development when HUD suspended the rule in early 2018) to guide and implement policies that reduce racial inequality by addressing housing segregation. See Alex Macon, “Dallas Fair Housing Study Won’t Be Stopped by Trump Administration Decision,” *D Magazine*, January 9, 2018, <https://www.dmagazine.com/frontburner/2018/01/dallas-fair-housing-study-wont-be-stopped-by-trump-administration-decision/>; and Myriam Igoufe, “Racial and Economic Segregation in Dallas Is Getting Worse,” *Dallas Morning News*, November 9, 2018, <https://www.dallasnews.com/opinion/commentary/2018/11/09/racial-and-economic-segregation-in-dallas-is-getting-worse/>. And in 2018 California adopted a law requiring cities and counties across the state to affirmatively further fair housing, with implementation modeled on the 2015 HUD rule. See California Assembly Bill No. 6868, September 30, 2018, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB686; Xavier Becerra and Leticia James, “Comments on Proposed Rule: Docket No. FR-6123-P-02; Affirmatively Furthering Fair Housing,” 85 Fed. Reg. 2041 (March 16, 2020), https://oag.ca.gov/system/files/attachments/press-docs/2020.03.16_AFFH%20Comment%20Letter.pdf.
- 11 These improvements are based on what we have learned from fair-housing planning efforts to date, from fair-housing settlements over several decades, from other federal place-based programs, from analogous efforts at the state and local levels, and from early cohorts of communities that worked hard to comply with the 2015 rule. See for example Justin Steil and Nicholas Kelly, “The Fairest of Them All: Analyzing Affirmatively

- Furthering Fair Housing Compliance,” *Housing Policy Debate* 29, no. 1 (2019), <https://dusp.mit.edu/sites/dusp.mit.edu/files/attachments/publications/Steil%20Kelly%202019%20The%20Fair%20Housing%20Act%20All.pdf>; Annelise Osterberg, “Best Practices for Allocating and Evaluating RHNA” (Berkeley: University of California, Berkeley Turner Center, 2020), http://turnercenter.berkeley.edu/uploads/A.Osterberg_APA_Best_Practices_for_Allocating_and_Evaluating_RHNA_.pdf; Nicholas Finio, Willow Lung-Amam, Brandon Bedford, Gerrit Knaap, Casey Dawkins, and Eli Knaap, *Toward an Equitable Region: Lessons from Baltimore’s Sustainable Communities Initiative* (College Park, MD: National Center for Smart Growth Research and Education, 2018), <https://www.enterprisecommunity.org/download?fid=9718&nid=6931>; Richard Kahlenberg, “An Economic Fair Housing Act” (Washington DC: Century Foundation, August 3, 2017), <https://tcf.org/content/report/economic-fair-housing-act/>; Diego Iñiguez-Lopez, *Realizing the Promise: How to Affirmatively Further Fair Housing* (Opportunity Agenda 2014) https://www.opportunityagenda.org/sites/default/files/2018-04/2014.11.10_realizing_the_promise_final.pdf; Robert Schwemm, “Overcoming Structural Barriers to Integrated Housing: A Back-to-the-Future Reflection on the Fair Housing Act’s “Affirmatively Further” Mandate,” *Kentucky Law Journal* 100, no. 1 (2012), https://uknowledge.uky.edu/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1148&context=law_facpub; National Commission on Fair Housing and Equal Opportunity, *The Future of Fair Housing* (December 2008), https://nationalfairhousing.org/wp-content/uploads/2017/04/Future_of_Fair_Housing.pdf;
- ¹² For a recent and concise review of this research, see Margery Austin Turner and Ruth Gourevitch, “How Neighborhoods Affect the Social and Economic Mobility of Their Residents” (Washington, DC: US Partnership on Mobility from Poverty, 2017), <https://www.mobilitypartnership.org/publications/how-neighborhoods-affect-social-and-economic-mobility-their-residents>.
- ¹³ Scores on individual factors would be combined into a composite neighborhood opportunity score with values ranging continuously from low to high. Note that composite scores of this kind are complex and can fall short of providing the insights necessary to design solutions or inform individual decisions, but they can be useful for high-level assessments of change over time and across jurisdictions. See Edward Goetz, “Your ‘Opportunity’ Map Is Broken. Here Are Some Fixes,” *ShelterForce*, November 16, 2017, <https://shelterforce.org/2017/11/16/your-opportunity-map-is-broken-here-are-some-fixes/>.
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- ¹⁶ Martha Galvez, Maya Brennan, Brady Meixell, and Rolf Pendall, *Housing as a Safety Net* (Washington, DC: Urban Institute, 2017) https://www.urban.org/sites/default/files/publication/93611/housing-as-a-safety-net_1.pdf.
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