

2022 - 2026 ASSESSMENT OF FAIR HOUSING

Prepared by the City of Lewisville Neighborhood Services Department with the assistance of the National Development Council





Executive Summary

In early 2022, the City of Lewisville began engaging in a fair housing planning process. Fair housing planning involves reviewing local data and gathering feedback from local stakeholders in order identify factors that contribute to housing-related discrimination in a community. This data is then used to develop goals that seek to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on certain protected characteristics. Title VIII of the Civil Rights Act of 1968, commonly known as the Fair Housing Act, defines these protected characteristics, which are:

- Race
- Color
- National origin
- Religion
- Sex (including gender identity and sexual orientation)
- Familial status, and
- Disability

The City of Lewisville conducted a combined community participation process for its 5-Year Consolidated Plan and Assessment of Fair Housing. The City engaged in a 5-pronged approach to seek and obtain meaningful feedback from agencies and service providers, along with members of the public. Efforts were made to obtain feedback from populations who are least likely to participate in a community engagement process, including low- and moderate-income (LMI) individuals and families, persons with Limited English Proficiency (LEP), and disabled individuals.

The continuing (and rapidly accelerating) loss of affordable housing options in the City of Lewisville was a primary concern voiced by service providers and residents of all races, ethnicities and disability statuses. Stakeholders indicated that many low- and moderate-income households are struggling with the double tsunami of rising housing costs and rising food costs. Stakeholders noted that these rising prices have severely impacted elderly persons and other individuals on a fixed income, including disabled individuals who cannot work and who do not have the ability to take on extra shifts or work a second job in order to deal with rising prices.

The data supports residents' concerns about the economic vulnerability of certain city residents. While the median household income in Lewisville is \$73,246 for White, non-Hispanic households, the median household income is \$56,523 for Black or African American households and \$60,437 for Hispanic or Latino households. Likewise, a higher percentage of persons with a disability are living in poverty (13.6%) than persons without a disability (8.1%). As such, Black and Hispanic households, along with disabled persons, are likely to be more vulnerable to economic pressures such as rising home sales values and rents, as well as rising costs for other goods and services that impact a household's budget. Additionally, Black and Hispanic households living in Lewisville have lower rates of homeownership, which means that they have less opportunity to build wealth via homeownership.

However, when compared to the broader DFW region, the City of Lewisville has less racial and ethnic segregation and non-White persons are less exposed to concentrated poverty in their neighborhoods. Likewise, non-White students have better access to high-performing schools and low-income persons generally live in close proximity to numerous jobs. *Thus, Lewisville's primary concern is not how to foster inclusive communities free from barriers that restrict access to opportunity but how to maintain and*

strengthen access to the city's affordable housing options, environmentally-healthy neighborhoods, good schools and plentiful jobs.

This document, the **Assessment of Fair Housing**, compiles the data and feedback that was gathered during the 2022 fair housing planning process and sets forth multiple fair housing goals. The City identified the following as factors that contribute most significantly to racial and ethnic discrimination, patterns of segregation, and barriers that restrict access to opportunity in the City of Lewisville based on protected characteristics.

The **contributing factors** are:

- Displacement of residents due to economic pressures
- Loss of affordable housing
- Source of income discrimination
- Lack of access to opportunity due to high housing costs
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of affordable, integrated housing for individuals who need supportive services
- Availability, type, frequency, and reliability of public transportation
- Access to transportation for persons with disabilities
- Location of proficient schools and school assignment policies
- Lack of regional cooperation
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Lack of resources in both public and private organizations related to language access and provision of services to racially and ethnically diverse populations.

In order to address the contributing factors listed above, the City of Lewisville has set the following goals:

- 1. Prevent displacement by repairing 10 units of housing owned by a low- or moderate-income homeowner and 30 units of naturally-occurring affordable rental housing.
- 2. Prevent displacement by increasing low- and moderate-income household's access to eviction-prevention counseling and legal services in order to prevent at least 25 households from being evicted.
- 3. Improve access to opportunity by constructing at least one complete street in the Triangle neighborhood that is designed and operated to enable safe use and support mobility for all users, including people of all ages and abilities, and regardless of whether they are traveling as drivers, pedestrians, bicyclists, or public transportation riders.
- 4. Improve access to opportunity by collaborating with government representatives, persons receiving portable housing subsidies (vouchers or emergency rental assistance), and landlords in the North Texas region related to housing, employment, and transportation access.
- 5. Collaborate with lenders to increase home purchase opportunities so that at least 5 low- or moderate-income households are able to purchase homes in Lewisville.
- 6. Finalize development code changes that allow for development of missing middle housing and implement strategies that facilitate development of missing middle housing.
- 7. Provide a Resolution of Support for at least one proposed affordable rental housing development near transit and provide support related to rezoning and other entitlements.

- 8. Amend the Lewisville Fair Housing ordinance to prohibit the refusal to lease or rent a housing accommodation to a military veteran because of the veteran's lawful source of income to pay rent.
- 9. Work with the Denton County Transit Authority to improve the GoZone On Demand service so that it is more accessible to: (1) families with young children by determining if car seats are required by law and then communicating expectations with riders prior to pick up, (2) persons with Limited English Proficiency by enhancing language translation in marketing and customer service, (3) residents of apartment communities by increasing communication with residents and drivers regarding pick-up locations, and (4) shift workers by using operational data to evaluate the necessity and feasibility of expanding GoZone service hours. In addition, provide better access to paratransit (Access) service for persons with cognitive or visual disabilities by streamlining application and approval processes.

Housing-related goals - The City's new goals take into account the continuing – and expanding – need to preserve existing affordable housing units and leverage private resources to create additional affordable housing units. The City's new housing preservation goals are modest because the City will need to: develop new policies and procedures for the rental home repair program, draft agreements, conduct internal training of the staff who will implement the program, and conduct training and outreach to single-family and multifamily landlords.

The City also recognizes that it is important to continue to set goals related to promoting equitable access to credit and home lending. With its new set of goals, the City will seek to leverage the knowledge and expertise of local lenders who administer programs that provide direct financial assistance and favorable loan terms to low- and moderate-income homebuyers, including bank-sponsored down-payment assistance programs and programs offered to military veterans via the Texas Veteran's Land Board.

The new housing-related goals also recognize that many low- and moderate-income households are under extreme financial stress due to the combination of job losses and increased expenses that directly resulted from the COVID-19 pandemic, inflation-related cost increases for consumer goods and services, along with rising rental and home sales prices. Therefore, the City will partner with service providers to help prevent evictions and to provide emergency financial assistance to households.

Furthermore, the City acknowledges that it does not have sufficient public resources or staff capacity to provide direct financial assistance to households who are unable to afford rental housing in Lewisville. Therefore, it is important to leverage other public resources that may be used to assist such households, such as Housing Choice Vouchers/Section 8 and Veterans Affairs Supportive Housing (VASH) vouchers. Therefore, the City will seek to increase the number of landlords who accept VASH vouchers by amending its Fair Housing ordinance to align with state law and to prohibit the refusal to lease or rent a housing accommodation to a military veteran because of the veteran's lawful source of income to pay rent. The City will also cooperate at a regional level to learn from and share information with government representatives, persons receiving portable housing subsidies (vouchers or emergency rental assistance), and landlords in the North Texas region related to housing, employment, and transportation access.

The City's goals also recognize that it is necessary to leverage private sector capacity and investment to add affordable rental and owner-occupied units to the City's housing stock. Therefore, the City will focus on supporting at least one high-quality, transit-oriented development that is seeking to add new affordable housing units via the Low-Income Housing Tax Credit Program. Furthermore, after the City finalizes its changes to its local land use and development policies, the City will develop a toolkit that

assists homeowners and developers with taking advantage of the expanded housing development options in the new code.

Transportation-Related Goals – Stakeholder feedback led the City to add two new transportation goals. Lewisville is a city that is bisected by numerous large highways and there are limited transportation options for people who do not have access to an automobile. There are not enough walking and biking routes that allow people to safely access their job, school, doctor's offices, grocery store or community centers.

Therefore, it is important that the public transportation that is provided in Lewisville is convenient and accessible for low- and moderate-income households, many of which include members of protected classes under the Fair Housing Act. Stakeholders provided detailed and valuable information regarding how the new GoZone On Demand service can be improved so that it better serves Lewisville residents. Therefore, the City developed one goal that seeks to work closely with the Denton County Transit Authority to gather additional stakeholder feedback and initiate system improvements.

Finally, low-income stakeholders who do not own cars suggested that Lewisville invest more in protected bike lanes, including along South Texas State Highway Business 121 in the Triangle neighborhood. They noted that many residents walk or bike to reach the closest amenities, such as Walmart for groceries. Therefore, the City has set a goal to add at least one Complete Street in the Triangle neighborhood to increase mobility access for stakeholders who do not own cars.

Community Participation Process

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

The City of Lewisville conducted a combined community participation process for its 5-Year Consolidated Plan and Assessment of Fair Housing. The City engaged in a 5-pronged approach to seek and obtain meaningful feedback from agencies and service providers, along with members of the public. Efforts were made to obtain feedback from populations who are least likely to participate in a community engagement process, including low- and moderate-income (LMI) individuals and families, persons with Limited English Proficiency (LEP), and disabled individuals.

The five methods of outreach were:

1. Community Needs Assessment - The Community Needs Assessment (Survey) was deployed via SurveyMonkey starting on April 29, 2022. SurveyMonkey was selected as the online survey platform because it has a clean, functional user interface for desktop, tablet, and mobile device users. Using a platform that functioned well on cell phones was important, since many LMI individuals and families may not have access to a desktop computer. Since approximately 10% of Lewisville residents speak Spanish as their primary language, the survey was translated into Spanish.

The City advertised the Survey on its website, social media channels, and via the citywide newsletter, the Lewisville Horizon (printed and electronic versions). Flyers (printed in English and Spanish) were shared electronically with local service providers and were hand-delivered to local business owners and at one of the local food banks. Printed copies of the Survey were made available at city recreation centers.

Persons who live, work, and volunteer in Lewisville were invited to provide insight and feedback regarding housing, neighborhood, social services, and economic development needs in Lewisville. The Survey consisted of 46 questions for residents of Lewisville, with less questions being asked of non-residents. In addition to being asked about community needs, Lewisville residents were also asked to share any lived experiences related to discrimination they may have faced related to the sale, rental, and financing of housing, including lending practices. The City of Lewisville received 227 responses. A copy of the Survey is included in the Appendix along with survey data.

- **2. Town Hall Meetings** The City of Lewisville held four town-hall style meetings on the following dates:
 - a. Saturday, May 7, 2022 at 11am Next Steps Center, 1303 S. State Hwy. 121
 - b. Thursday, May 12, 2022 at 7pm Lewisville Grand Theater, 100 N. Charles Street
 - c. Monday, May 16, 2022 at 10am Thrive Recreational Center, 1950 S. Valley Pkwy.
 - d. Thursday, June 2, 2022 at 6:30pm Westside Baptist Church, 900 Bellaire Blvd.
- 3. Public Hearings The City of Lewisville held 3 public hearings at Lewisville City Hall to consider public comments regarding the Consolidated Plan. These public hearings were held on May 16, July 18, and August 1, 2022. The public comment period was open from July 12-August 12, 2022.
- **4. One-on-One Stakeholder Consultations** The City of Lewisville conducted 19 consultations with local and regional service providers, representatives of various city departments, advocacy organizations, and local leaders during the months of April through July.
- 5. Focus Groups with Populations Who are Least Likely to Participate During the months of July and August, the City held focus group meetings at: (a) Evergreen at Vista Ridge apartment community an income-restricted senior living apartment community with 120 units; this development received Low Income Housing Tax Credits (LIHTC) from the State of Texas; (2) Autumn Breeze apartment community a market-rate family apartment community that participates in voucher programs including Housing Choice Vouchers/Section 8 and Veterans Affairs Supportive Housing (VASH); this community also has many residents who are Limited English Proficient and (3) Chin Baptist Church the church serves members of the Chin ethnic group, many of whom are refugees from Burma (Myanmar).

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

Below is a chart that details the organizations that were consulted during the community participation process:

Name of Agency/Group/Organization Consulted
Chin/Burmese Community Leaders
Denton Housing Authority
Salvation Army
North Texas Fair Housing Center
Denton County MHMR
Texas Appleseed
Journey to Dream/Kyle's House
Generation Housing Development
Christian Community Action (CCA)
Inclusive Communities Project (ICP)
Communities in Schools
Autumn Breeze Apartments
Lewisville ISD
Lewisville Planning Department
SPAN/Meals on Wheels of Denton County
Lewisville - CDBG Advisory Committee
Lewisville - Code Enforcement Department
United Way of Denton County
Next Steps Center (Valley Creek Church)
Independent Real Estate Agent

Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

This summary of public comments incorporates feedback related to both the Consolidated Plan and the Assessment of Fair Housing.

The Community Needs Assessment received 227 responses. Depending on the question, between 100-130 respondents were willing to share demographic and other relevant information about themselves. Of the respondents who shared information about themselves, 84% were homeowners and 16% were renters. Nearly half of respondents reporting being housing-cost burdened (45%).

Seventy percent of respondents identified as female, 74% identified as White, 14% identified as Black or African American and 15% identified as Hispanic or Latino. Additionally, 10% of respondents identified as a disabled person, nearly 9% identified as veterans, nearly 23% identified as aged 65+, 6% identified as a LGBTQIA person, nearly 2% identified as a homeless or formerly-homeless person, 5% identified as a first-generation immigrant, 2% identified as a formerly-incarcerated person, 21% identified as a low- or moderate-income person, and 10% identified as a single parent or a grandparent raising grandchildren.

Because Lewisville is a city that is bisected by large highways, it can be very difficult for persons to engage with their local government when they do not own a car, do not engage on social media, have limited literacy skills, and/or have Limited English Proficiency (LEP). Therefore, in order to increase participation from such populations of persons, the City of Lewisville will continue to identify opportunities to engage residents within their own communities, including persons living in apartment communities. Additionally, Lewisville will continue to partner with service providers who have strong connections with such populations.

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

All comments and views were received and incorporated into the AFH.

Segregation/Integration

- Multiple survey respondents said that the City should not engage in any actions that encourage
 people who cannot afford the current rents or sales prices to move to Lewisville. Commentators
 voiced opinions that low-income persons, including persons using housing vouchers, would
 become an additional burden on existing tax-paying Lewisville residents.
- Several survey respondents voiced the opinion that landlords should not accept housing vouchers because properties become "bad" and "crime-ridden" when voucher-recipients live at the property.
- Numerous service providers noted that Lewisville needs to develop a plan to help the homeless population rather than deny that the population exists.
- One resident noted that she posted both the English- and Spanish-language versions of the fliers
 advertising the town hall meetings on the City's two main Facebook pages. However, the
 moderator of one of the Facebook pages inexplicably removed the Spanish-language version of
 the flier.

Disproportionate Housing Needs

- The most common concern voiced by community members was the rising cost of housing. Stakeholders citied rapidly rising rents, home sales prices, and property taxes as the reason why far too many families are experiencing one or more of the following: housing-cost burdens, homelessness, and being priced out of the city entirely.
- Several leaders of non-profit organizations that primarily serve LMI persons aged 65 and older noted that many of their clients are single family homeowners who struggle to maintain their homes. Such homeowners often end up confined to living in certain areas of their house, due to maintenance issues that create safety hazards (ex. holes in floors, leaking roof) or lack of

- accessible features, such as grab bars in bathroom showers/tubs or lowered kitchen countertops. Additionally, an inability to pay for whole-home heating and cooling costs can lead such residents to isolate themselves in one room that can be adequately heated or cooled.
- Both multifamily rental property managers and local service providers who work with LMI individuals expressed concerns about housing stability as COVID-19 eviction moratoriums have expired and pandemic-related emergency rental assistance programs have ceased operation. These stakeholders explained that, especially in instances where an apartment community is owned by an institutional corporate landlord, property managers are under increasing pressure to evict tenants who are delinquent on rent so that they can lease-up units at higher rental rates. Social services agencies are fielding calls from property managers who are trying find assistance for long-term residents who are now at risk of being evicted.
- Interviews with service providers indicate that the increasing rental housing costs in Lewisville place families with children in precarious housing situations. LMI families must move frequently to access more affordable housing or better-paying jobs as rents increase, which can result in gaps between leases. During these gaps, families often move into short-term housing options, such as extended stay motels. The high cost of short-term housing, including daily fees for necessary services such as broadband access, exacerbates financial challenges for these families. Stakeholders also indicated that families are likely to be "doubled up" in housing situations when faced with hardship; this crowding of housing conditions is not captured in Census data and places families in a situation where they must move frequently to avoid detection or repercussion by landlords.
- According to Denton County stakeholders familiar with homelessness issues, the high level of need for Rapid Re-Housing services often results in delayed provision of assistance due to resource constraints. As a result, these individuals and families need more intensive intervention when resources to assist them become available. Even when individuals and families are able to access Rapid Re-Housing assistance, it can be very challenging for them to maintain stable housing once the Rapid-Rehousing assistance expires. This challenge is especially acute for households whose homelessness vulnerability is related to loss of income, since many apartment complexes in Lewisville require prospective tenants to demonstrate that their income is at least 3-5 times the unit's monthly rent.
- Service providers indicated that even when landlords are offered significant incentives by Rapid Re-Housing assistance organizations, including increased deposits and months of rent guarantees, landlords are often unwilling to change their minimum-income thresholds in order to accommodate persons receiving Rapid Re-Housing Assistance.
- Stakeholders report that, without an emergency or transitional shelter within Lewisville, non-profits who serve homeless families often end up providing emergency financial assistance so that families can stay at one of Lewisville's extended stay motels such as Intown Suites or Budget Suites. Stakeholders report that families who are not receiving any form of housing assistance often end up staying at these extended stay hotels too, due to the fact that the motels unlike traditional landlords do not perform credit or background checks and accept housing payments on a weekly, rather than monthly basis. However, there are many reasons why relying on an extended stay motel is not beneficial, and can actually be harmful for families experiencing homelessness, including the fact that such hotels often do not have more than one bedroom or any separate space where a child can focus on homework. Additionally, stakeholders reported

- than these hotels have started charging additional mandatory fees for services such as internet access.
- Stakeholders indicated that many LMI households are struggling with the double tsunami of rising housing costs and rising food costs. Stakeholders noted that these rising prices have severely impacted elderly persons and other individuals on a fixed income who do not have the ability to take on extra shifts or work a second job in order to deal with rising prices. Instead, such persons are forced to cut back on items such as food and prescriptions. One participant noted that LMI seniors who receive a free or reduced-price lunch will often eat half of the meal and save the rest for dinner. Due to the lack of walkability in many areas of Lewisville, there is also a need for food delivery to persons who are homebound or have limited access to transportation options.
- Some stakeholders mentioned that aging apartment complexes are not well-maintained and pose a health and safety risk for residents. Survey respondents noted that lack of maintenance is also an issue at single-family rental properties where landlords avoid rental inspections by keeping the water bills in their name.
- Several survey respondents expressed their belief that rundown apartments are a magnet for crime and are "slums." Others stated that Lewisville has too many apartments and should not allow any more to be built.
- Several survey respondents also expressed concern that there are too many single-family neighborhoods where the exteriors of homes are not maintained and there are too many cars parked at the home and in the street.

Access to Opportunity

- Low-income stakeholders who do not own cars suggested that Lewisville invest more in protected bike lanes along South Texas State Highway Business 121 in the Triangle neighborhood. They noted that many residents walk or bike to reach the closest amenities, such as Walmart for groceries. Low-income stakeholders also expressed a desire for more neighborhood parks with playgrounds for children.
- Nearly every stakeholder who was consulted about transportation access in Lewisville voiced concerns about the current design of the GoZone On Demand service. Stakeholders noted the following issues have a negative impact of families, low-income persons, persons with Limited English Proficiency, and homeless individuals:
 - Families with Children GoZone does not offer an option to order a vehicle equipped with a car seat. Therefore, if a parent wants to ensure that their child is safely restrained during the GoZone ride, they must bring their own car seat – and then carry it with them on all of their errands.
 - Persons with Limited English Proficiency While printed informational materials have been translated into Spanish, the app's interface is in English, with no apparent option for Spanish or Chin translation. Likewise, stakeholders indicated that there are not customer service agents who speak languages other than English.
 - Persons who work outside of Lewisville and who work late-night shifts— During the weekdays, GoZone users may only travel within one of the designated GoZone zones.

Therefore, a rider would not be able to travel directly from Lewisville to Denton on the GoZone because the cities are located within different zones. Additionally, LMI individuals who work in the hospitality, retail, and food service sectors often work shifts that end after 10 p.m., which is when GoZone stops serving riders on the weekdays.

- Persons living in apartment communities Stakeholders living in apartment communities reported that their GoZone drivers repeatedly canceled their ride due to an inability to "locate the rider." This problem is likely a result of apartment addressing systems and a lack of training and communication regarding where drivers will pick up riders, such as at the leasing office or community center.
- O Homeless individuals Service providers who work with persons experiencing homelessness expressed concern that drivers may choose not to pick up homeless individuals, due to pre-conceived notions about poor hygiene or mental health issues. Additionally, many services for homeless individuals are located in the City of Denton, but homeless individuals cannot directly travel from Lewisville to Denton via the GoZone service.
- Persons with disabilities While the GoZone service allows users to request a wheelchair-accessible vehicle, there is no information related to accessibility accommodations/modification for persons with other disabilities, such as cognitive or visual disabilities. The DCTA provides a separate Access on Demand service for persons with physical, visual and cognitive disabilities however individuals must apply and be certified as eligible before they may use this service.
- Low-income focus group participants stated that it can be time-consuming and frustrating to apply to multiple service providers in order to obtain assistance in meeting their basis needs. Both non-profit stakeholders and low-income focus group participants indicated that some service providers in Lewisville have a "high barrier to entry," meaning that it can be very difficult to qualify for the services provided by the organization. These barriers could include: long and confusing applications, burdensome documentation requirements, applications not offered in languages other than English, and requirements that an application be submitted in person. Stakeholders acknowledged that funding source requirements often drive the complexity of the application process.
- Town hall attendees as well as low-income stakeholders who participated in focus group meetings
 expressed a desire for non-profits to provide more extensive programming for youth, such as the
 type of programming provided by a Boys and Girls Club. Stakeholders noted that existing youth
 service programs have limited hours and do not always provide transportation.

Disability Access

Stakeholders shared that there is only one state-licensed All Day Activity Provider (sometimes
referred to as Adult Day Care) in Lewisville. Likewise, Lewisville has no Intermediate Care Facilities
for individuals with intellectual disabilities (ICF/IID). Such facilities have 24-hour staffing and can
assist residents with medication management and activities of daily living. The Denton County
MHMR Center previously operated 6 ICF within Denton County but will likely operate only 4

facilities in 2023 due to staffing shortages. Taking the place of licensed ICF are unlicensed group homes, which, according to stakeholders, often do not provide safe and sanitary living conditions and may financially exploit their residents.

Undercounting of Certain Populations

• Stakeholders repeatedly mentioned that U.S. Census figures do not accurately reflect the actual population of people living in the Triangle, as many residents are likely to be undercounted in government-led surveys such as the Decennial Census and the American Community Survey. Stakeholders mentioned the following factors that likely impact undercounting: a person's undocumented status, a person's distrust of the government, and families "doubling-up" (such that not all occupants are listed on the lease).

Assessment of Past Goals and Actions

Discuss what progress has been made toward the achievement of fair housing goals. Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences). Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals or mitigate the problems it has experienced.

The City of Lewisville completed its last Assessment of Fair Housing in 2017. In that AFH, the following factors were identified as contributing to fair housing issues:

Fair Housing Contributing Factors and Priorities

Contributing Factor	Priority	Discussion
Availability of Affordable Units in a Range of Sizes	Medium	There is a need for additional publicly assisted housing throughout the City. Racial or ethnic minority households are more likely to be experiencing a disproportionate need due to cost burdens, incomplete plumbing or kitchen facilities, or overcrowding. This contributing factor has been assigned a medium level of priority based on the extent of the need and the City's ability to respond to this need.
Access to financial services	High	The ability of residents throughout the City to secure home purchase loans varies according to the race and ethnicity of the loan applicant. This was identified in data gathered under the Home Mortgage Disclosure Act (HMDA). The City has designated efforts to address this factor to be of "high" priority.
Resistance to affordable housing	Medium	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to a lack of affordable housing in the City. Lack of affordable housing restricts the fair housing choice of City residents. The City has assigned this factor a priority of "medium".
Discriminatory actions in the market place	Medium	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, serves to limit the fair housing choice of residents with disabilities and racial/ethnic minority groups. The City has assigned this factor a priority of "medium".
Lack of understanding of fair housing law	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to discrimination and differential treatment in the housing market. Furthermore, a lack of understanding of fair housing law means that those who may suffer discrimination in the housing market do not know where to turn when they do. The City has assigned this factor a priority of "high".
Access to publicly supported housing for persons with disabilities	Medium	There is limited availability of publicly supported housing in the City for persons with disabilities, especially with access to transportation. The City has assigned this factor a priority of "medium."
Lack of affordable, accessible housing for seniors	High	The lack of affordable housing continues to be an issue City-wide, coupled with a growing senior population, culminates in a growing need for senior access to affordable housing. The City rates this factor as a "high" priority."
Lending Discrimination	Medium	As demonstrated by HMDA data, there is the presence of lending discrimination in the community, especially for minority populations. This impacts these communities' ability to access a variety of housing options, and the City rates this factor as a "medium" priority.
Private Discrimination	Medium	As seen throughout the public input process, there are instances of private discrimination in the marketplace, limited access for some protected classes to housing options in the City. The City rates this factor as a "medium" priority
Siting Selection Policies	High	City siting selection policies and zoning may negatively impact the development of affordable housing in the City of Lewisville. The City has assigned this as a "high" priority.
Practice and decisions for publicly supported housing	Medium	In addition to siting selection policies, the practice and decisions for publicly supported housing may not promote publicly supported housing within the City. This may limit the amount of new publicly supported housing developments in the City, and the City has assigned this factor as a "medium" priority.
Lack of quality health care for some racial minorities	Medium	Public input indicated a need for access to healthcare for the Chin community in Lewisville. As the Chin population continues to grow, access to health care and other social services has been an on-going issue. The City rates this as a "medium" priority.

The City developed following six goals that were designed to address the barriers to fair housing access.

City of Lewisville Fair Housing Goals, Issues, and Proposed Achievements 2017 – 2021 Assessment of Fair Housing

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant				
Enhance understanding of fair housing and fair housing law	Resistance to affordable housing Discriminatory actions in the market place Lack of understanding of where to turn	Discriminatory terms and conditions in Rental Failure to make reasonable accommodation	One seminar, training, or outreach event each year	City of Lewisville				
complaints based upon failur annually. Flyers regarding F community. City staff will spe volunteer Neighborhood Lea	Discussion: Public input and stakeholder comments revealed that there is additional need for fair housing outreach and trainings. Housing complaint data registered many complaints based upon failure to make reasonable accommodation. City Staff will speak at a Greater Lewisville Association of Realtors (GLAR) meeting to discuss Fair Housing annually. Filyers regarding Fair Housing will be provided to Mobilizing Area Resources to You (MARTY), which is deployed around Lewisville to bring City Hall out into the community. City staff will speak annually at a Neighbors Leading Neighbors quarterly meeting. The purpose of the Neighbors Leading Neighbors (NLN) Program is to cultivate volunteer Neighborhood Leaders who engage, empower, and motivate residents to improve the quality of life in their neighborhoods with the goal of advancing the long-term vitality of the community. The City website will also be enhanced to include more information on Fair Housing.							
Promote the development of accessible and affordable housing	Access to financial Services Availability of affordable units in a range of sizes Access to publicly supported housing for persons with disabilities Lack of affordable, accessible housing for seniors	Limited access to financial services Limited affordable housing, especially for minorities and seniors	Fund housing rehabilitation for 10 units by the year 2021- 2022.	City of Lewisville				
over 41 percent of black house and residents with disabilities the high level of cost burden	risville has an increasing number of households with seholds and 48 percent of Hispanic households exp is face limitations in the supply of accessible, afforda within the City. Promoting the rehabilitation of hou and will especially benefit seniors and persons with	erience housing problems. In add ble housing. The number of housing sing options accessible to a range disabilities.	ition, based on public input and sing units available to all income le	takeholder feedback, seniors vels are limited, as shown by				
Enhance financial literacy and promote equitable access to credit and home lending	Lending Discrimination Private discrimination Access to financial services	Disproportionate high denial rates for racial and ethnic minorities Lack of understanding of credit and mortgage application process	One seminar, trainings, or outreach event each year	City of Lewisville				
points higher than for white Lewisville will take to ensure	r owner-occupied home purchases varied by the ra applicants. Enhancing financial literacy through ser financial literacy is not a hurdle that households con sesion for leaders within the community, about Fair I	ce/ethnicity of the applicant. Deni ninars and trainings, as well as p tinue to face. City Staff will speak	artnerships with outside agencies annually at a Neighbors Leading	s is one step that the City of Neighbors quarterly meeting,				
Review and Revise Local Land use Policies	Resistance to affordable housing Siting selection policies Practices and decisions for publicly supported housing	Resistance to affordable housing Prospective discriminatory practices and policies NIMBYism Availability of affordable units in	Conduct a review of land use policies and regulations by 2021-22	City of Lewisville				
of affordable units. Review of range of sizes may be limite rewrite since the 1970's.The	of housing accessible to a variety of income levels of local land use policies may positively impact the p d by the current zoning practices. The City of Lev City will be conducting small area plans with coming and development code regulations.	placement and access of publicly s visville has amended the zoning a	supported and affordable housing and development policies, but the	. The availability of units in a ere has not been a complete				

Enhance fair housing enforcement and reduce market discrimination	Discriminatory actions in the market place Lack of understanding of where to turn for fair housing Lack of knowledge of fair housing law Resistance to affordable housing	Discriminatory terms, conditions, or privileges relating to rental	Reach out to North Texas Fair Housing Center to: 1) Provide outreach and education on a yearly basis; and, 2) Provide fair housing seminars, at least bi-annually	City of Lewisville			
Discussion: Input received	from the 2016 Fair Housing Survey, as well as tes	timony received at the public engage	ement activities, demonstrated th	at while the organizational			
	available, many people still do not use the fair hou						
experts/advocates to make at	least two public presentations per year.						
Enhance community access to vital health and social services	Resistance to affordable housing Lack of quality health care for some racial minorities	Disparities in Access to Opportunity Access to healthy neighborhoods	Fund promotion of increased access to social and health services throughout City each year	City of Lewisville			
Discussion: As demonstrated by public input, as well as demonstrated by the access to opportunities discussion, households within the City of Lewisville have limited access to some vital services. The Chin population in the City of Lewisville has grown significantly in recent years. This community, in particular, has limited access to health services in the City. The City will fund a health services project during the 2017 Plan Year with CDBG funds. Additionally, the City will make efforts to increase access for minority populations, seniors, and other at-need groups to services, especially in areas where public transportation limits mobility. The City will review applications for CDBG social services stroughted access to be pattled and social services, and use CDBG funds to improve access to busic services throughout the next five years.							

Enhance understanding of fair housing and fair housing law — Over the past 5 years, the City has sponsored at least 6 fair housing workshops conducted by the North Texas Fair Housing Center. Approximately 219 people attended these sessions, including representatives from nonprofit agencies, the housing authority and landlords. Legal Aid of Northwest Texas also provided 2 legal webinars during the early stages of the COVID-19 pandemic.

Additionally, the City maintains a Fair Housing Page on its website to provide citizens with information on Fair Housing Resources. The City also distributes Fair Housing literature to social service agencies and to the public at Community Resource Expos. During the early stages of the COVID-19 pandemic, the City sponsored a call center that provided information to residents in need of resources during COVID-19.

Promote the development of accessible and affordable housing - Over the past 4 years, the City has struggled to implement its housing preservation programs. In 2017, the City successfully provided \$13,049 in home repairs to one LMI homeowner and \$15,000 in first-time homebuyer assistance to one LMI homebuyer. Since the time the City filed its most recent Consolidated Annual Performance and Evaluation Report (Oct 2020 – Sept. 2021 CAPER), the City has not completed home repairs or provided homebuyer assistance to any additional households.

Enhance financial literacy and promote equitable access to credit and home lending - The City funded the United Way for a financial coaching initiative. Funds helped train staff and volunteers in financial coaching methods. The United Way is currently operating a pilot program in Denton; once the pilot program is complete, the United Way will open services in Lewisville. However, Covid-19 has delayed implementation of the project. Curriculum has been purchased and staff is assembling the program for implementation.

Review and revise local land use policies - Lewisville is currently in the process of revising its existing zoning ordinance and land development code. Adoption of the revisions, which include the following provisions impacting the affordability of new housing development, is anticipated in Summer 2022:

- Combine zoning and land development regulations in a single Unified Development Code, which
 streamlines the development process by consolidating procedural requirements and eliminating
 potentially confusing or conflicting requirements. A streamlined development process saves
 developers time and money, reducing costs that are eventually passed on to renters/buyers in
 the form of higher rents and sale prices.
- Create flexibility for affordable residential infill:
 - Allow smaller minimum dwelling areas (current proposal is 1,000 sq ft) in all zoning districts; smaller homes are more likely to be within financial reach of first-time home buyers.
 - O Allow "backyard cottages," or Accessory Dwelling Units (ADUs), in some zoning districts by right, and in some zoning districts by special use permit. Additional requirements must be met, e.g., the principal dwelling must be owner-occupied, ADUs face size restrictions relative to the principal dwelling, and the ADU must have a dedicated off-street parking space. With robust uptake by property owners, ADUs can promote affordability by both increasing rental housing supply and creating an income stream for existing homeowners who are cost-burdened.
 - Allow duplexes by right in three of Lewisville's single-family zoning districts, subject to size minimums, setback and coverage requirements, and the provision of three off-street parking spaces per unit. Well-designed duplexes use land more efficiently than singlefamily homes, increasing housing supply and offering relatively smaller homes at a more affordable price point.
- Remove exterior finish material requirements for residential construction such that masonry is no longer necessary. Allowing builders to use less expensive but durable materials can increase the affordability of new construction, especially when building supply shortages are in effect.

Enhance fair housing enforcement and reduce market discrimination – In 2021, the City contracted with the North Texas Fair Housing Center (NTFHC) to conduct a Rental Audit to measure the nature and extent of race discrimination in the City of Lewisville. NTFHC used testing to gather information about how African Americans are being treated in the rental housing marketplace in the City of Lewisville.

The following paragraphs directly quote from NTFHC's summary of its findings, which was provided to the City of Lewisville in September 2022:

NTFHC's Rental Audit was based on 20 rental tests conducted throughout the City of Lewisville. NTFHC conducted site visits at advertised apartment to measure how landlords and managers responded to inquiries about renting a unit. A test involves a minority group tester referred to as a "protected tester" and a majority group tester referred to as a "control tester" who both visit the same housing unit for rent. The testers are matched on all relevant characteristics. These characteristics include income, family size, length of employment and other relevant factors. Characteristics are carefully chosen to ensure that the protected tester is a superior applicant to the matching control tester with regard to income, number of years at current employer, etc. The matching of testers is important because it removes any financial or business justifications for rejecting the protected group applicant. In this audit, the Black testers were more qualified for the apartment than the White testers.

The Rental Audit illustrates that Blacks who are otherwise qualified can expect to encounter differences in treatment in 45% of their housing searches in the City of Lewisville. These results have far-reaching implications, because a person's housing choice affects more than his or her place of residences. Access to housing means access to quality education, employment opportunities, retail establishments, parks, and other public services.

In rental tests where evidence of differential treatment against African Americans was found:

- 25% involved differences in information regarding the availability of units
- 20% involved differences in follow-up contact received after the visit
- 10% involved differences in community amenities shown/told about during the visit
- 15% involved differences in what was told/not told about the qualification requirements
- 5% involved differences in units viewed during the visit
- 5% involved steering

The types of differential treatment documented in the Rental Audit confirm that discriminatory practices in housing can be quite subtle, making it difficult for home seekers to recognize and report suspicious rental practices or policies. For example, it is rare for a landlord or apartment manager to make direct racially discriminatory statements or to outright refuse to rent to African Americans. Instead, NTFHC's Rental Audit shows that discrimination based on race occurs through screening practices and delaying tactics. These practices are prohibited under the fair housing laws, even though they do not always amount to an outright denial of housing.

Based on the findings in the Rental Audit, the NTFHC recommended that the City of Lewisville:

- 1. Continue collaborations with the North Texas Fair Housing Center and other organizations that assist with housing issues, such as legal aid. In the past, these collaborations have led to successful housing rights training programs for the Lewisville community.
- 2. City of Lewisville officials should continue to incorporate fair housing goals into their education and outreach efforts so that barriers to fair housing can be addressed.
- 3. Sponsor fair housing training programs for the housing industry to educate agents, owners, and managers of apartment complexes on the Fair Housing Act.
- 4. Collaborate with the North Texas Fair Housing Center on a Fair Housing Month advertising campaign in April.

Enhance community access to vital health and social services – The City of Lewisville provided funding to numerous agencies that provided vital health and social services to Lewisville residents. In its last CAPER, Lewisville reported to following outcomes as a result of CDBG-funded investments:

- 45 cases staffed for 8 youth/abused children through CASA;
- 16,950 congregate and home-delivered meals to 140 elderly and disabled residents through SPAN;
- 143 shelter days to 4 family members through Denton County Friends of the Family;
- 706 pediatric patient office visits for 192 youths from PediPlace.

Additionally, the City provided general funds, which supported the following outcomes:

- 4762 senior volunteer hours completed by 30 Lewisville volunteers through Chisholm Trail RSVP;
- 479 financial assistance services provided to 383 Lewisville residents though Christian Community
 Action
- 229 face-to-face services for 44 family members through Denton County Friends of the Family;
- 1,119 case management services to 24 at-risk LISD students through Communities in Schools;
- 2 camperships to 2 disabled children or adults to experience camp through Camp Summit;
- 730 days of instruction to 58 low/ moderate income children through New Hope Learning Center;
- 140 medical visits to 47 low/ moderate income clients through Health Services of North Texas;
- 308 half-day habilitation sessions to 4 Lewisville residents through Special Abilities of North Texas;
- 338 case management services for 2 clients through Journey to Dream;
- 106 hours of counseling for 9 clients through Denton County MHMR;
- 100 meetings to support 5 Lewisville Agencies through United Way of Denton County;
- 28 emergency financial assistance services provided to 7 Lewisville residents through The Salvation Army

Connection Between Previous Goals and New Goals

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

Housing-related goals - The City's new goals take into account the continuing – and expanding – need to preserve existing affordable housing units and leverage private resources to create additional affordable housing units. The City's new housing preservation goals are modest because the City will need to: develop new policies and procedures for the rental home repairs program, draft agreements, conduct internal training of the staff who will implement the program, and conduct training and outreach to single-family and multifamily landlords.

The City also recognizes that it is important to continue to set goals related to promoting equitable access to credit and home lending. With its new set of goals, the City will seek to leverage the knowledge and expertise of local lenders who administer programs that provide direct financial assistance and favorable loan terms to low- and moderate-income homebuyers, including bank-sponsored down-payment assistance programs and programs offered to military veterans via the Texas Veteran's Land Board.

The new housing-related goals also recognize that many low- and moderate-income households are under extreme financial stress due to the combination of job losses and increased expenses that directly resulted from the COVID-19 pandemic, inflation-related cost increases for consumer goods and services, along with rising rental and home sales prices. Therefore, the City will partner with service providers to help prevent evictions and to provide emergency financial assistance to households.

Furthermore, the City acknowledges that it does not have sufficient public resources or staff capacity to provide direct financial assistance to households who are unable to afford rental housing in Lewisville. Therefore, it is important to leverage other public resources that may be used to assist such households, such as Housing Choice Vouchers/Section 8 and Veterans Affairs Supportive Housing (VASH) vouchers. Therefore, the City will seek to increase the number of landlords who accept VASH vouchers by amending its Fair Housing ordinance to align with state law and to prohibit the refusal to lease or rent a housing accommodation to a military veteran because of the veteran's lawful source of income to pay rent. The City will also cooperate at a regional level to learn from and share information with government representatives, persons receiving portable housing subsidies (vouchers or emergency rental assistance), and landlords in the North Texas region related to housing, employment, and transportation access.

The City's goals also recognize that it is necessary to leverage private sector capacity and investment to add affordable rental and owner-occupied units to the City's housing stock. Therefore, the City will focus on supporting at least one high-quality, transit-oriented development that is seeking to add new affordable housing units via the Low-Income Housing Tax Credit Program. Furthermore, after the City finalizes its changes to its local land use and development policies, the City will develop a toolkit that assists homeowners and developers with taking advantage of the expanded housing development options in the new code.

Transportation-Related Goals – Stakeholder feedback led the City to add two new transportation goals. Lewisville is a city that is bisected by numerous large highways and there are limited transportation options for people who do not have access to an automobile. There are not enough walking and biking routes that allow people to safely access their job, school, doctor's offices, grocery store or community centers.

Therefore, it is important that the public transportation that is provided in Lewisville is convenient and accessible for low- and moderate-income households, many of which include members of protected classes under the Fair Housing Act. Stakeholders provided detailed and valuable information regarding how the new GoZone On Demand service can be improved so that it better serves Lewisville residents. Therefore, the City developed one goal that seeks to work closely with the Denton County Transit Authority to gather additional stakeholder feedback and initiate system improvements.

Finally, low-income stakeholders who do not own cars suggested that Lewisville invest more in protected bike lanes, including along South Texas State Highway Business 121 in the Triangle neighborhood. They noted that many residents walk or bike to reach the closest amenities, such as Walmart for groceries.

increase mobility access for stakeholders who do not own cars.				

Therefore, the City has set a goal to add at least one Complete Street in the Triangle neighborhood to

New Fair Housing Goals and Performance Metrics (Goals 1-5)

	Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participants
1	Prevent displacement by repairing 10 units of housing owned by a low- or moderate-income homeowner and 30 units of naturally-occurring affordable rental housing.	Displacement of residents due to economic pressures; Loss of Affordable Housing	Disproportionate housing needs	Within 5 years, repair 10 units of housing owned by a low- or moderate-income homeowner and 30 units of naturally-occurring affordable rental housing.	City of Lewisville
2	Prevent displacement by increasing LMI household's access to eviction- prevention counseling and legal services in order to prevent at least 25 households from being evicted.	Displacement of residents due to economic pressures	Disproportionate housing needs	Within 5 years, increase LMI household's access to eviction-prevention counseling and legal services in order to prevent at least 25 households from being evicted.	City of Lewisville
3	Improve access to opportunity by constructing at least one complete street in the Triangle neighborhood that is designed and operated to enable safe use and support mobility for all users, including people of all ages and abilities, and regardless of whether they are travelling as drivers, pedestrians, bicyclists, or public transportation riders.	Lack of public investments in specific neighborhoods, including services or amenities	Access to opportunity	Within 5 years, construct at least one Complete Street in the Triangle neighborhood	City of Lewisville
4	Improve access to opportunity by collaborating with government representatives, persons receiving portable housing subsidies (vouchers or emergency rental assistance), and landlords in the North Texas region related to housing, employment and transportation access.	Lack of local or regional cooperation; Source of income discrimination	Access to opportunity	Within 1 year, convene a regional meeting; Within 3 years develop a strategic plan	City of Lewisville
5	Collaborate with lenders to increase home purchase opportunities so that at least 5 LMI households are able to purchase homes in Lewisville.	Access to financial services; Lending discrimination; Lack of access to opportunity due to high housing costs	Segregation/Integration, Access to opportunity	Within 5 years, at least 5 LMI households are able to purchase homes in Lewisville	City of Lewisville

New Fair Housing Goals and Performance Metrics (Goals 6-9)

	Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participants
6	Finalize development code changes that allow for development of missing middle housing and implement strategies that facilitate development of missing middle housing	Land use and zoning laws; Lack of access to opportunity due to high housing costs	Segregation/Integration, Access to opportunity	Within 1 year, finalize development code changes; Within 3 years develop a toolkit	City of Lewisville
7	Provide a Resolution of Support for at least one proposed affordable rental housing development near transit and provide support related to rezoning and other entitlements.	Lack of private investments in specific neighborhoods	Segregation/Integration, Access to opportunity, Disproportionate housing needs	Within the next 5 years, provide at least one Resolution of Support	City of Lewisville
8	Amend the Lewisville Fair Housing ordinance to prohibit the refusal to lease or rent a housing accommodation to a military veteran because of the veteran's lawful source of income to pay rent.	Source of income discrimination	Segregation/Integration, Access to opportunity	Within 1 year, adopt the amendment to the Fair Housing ordinance	City of Lewisville
9	Work with the Denton County Transit Authority to improve the GoZone On Demand service so that it is more accessible to: (1) families with young children by determining if car seats are required by law and then communicating expectations with riders prior to pick up, (2) persons with Limited-English Proficiency by enhancing language translation in marketing and customer service, (3) residents of apartment communities by increasing communication with residents and drivers regarding pick-up locations, and (4) shift workers by using operational data to evaluate the necessity and feasibility of expanding GoZone service hours. In addition, provide better access to paratransit (Access) service for persons with cognitive or visual disabilities by streamlining application and approval processes.	Availability, type, frequency, and reliability of public transportation	Access to opportunity	Within 6 months, meet with the DCTA; Within 1 year, Lewisville and DCTA facilitate stakeholder feedback meetings; Within 3 years DCTA implements system improvements	City of Lewisville

Fair Housing Analysis

Demographic Summary

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

Population and Demographic Trends – The City of Lewisville is a rapidly growing city that has experienced significant demographic changes over the 10-year time period between the 2010 Decennial Census and the 2020 Decennial Census. Specifically, since 2010, the City's total population has grown over 17%, from 95,290 to 111,822. Lewisville's population growth is aligned with the population trends occurring in the North Texas region. Lewisville is located within one of the largest metropolitan areas in the country, Dallas-Fort Worth-Arlington. According to the 2021 HUD PD&R Housing Market Profile for the region, "[b]etween 2010 and 2020, the DFW metropolitan area added more people than any other metropolitan area in the nation." The 2021 HUD PD&R Housing Market Profile goes on to note that "[f]our of the 20 counties in the nation that had the largest increase in population between 2010 and 2020 were in the DFW metropolitan area. Tarrant County added the most people of any county in the DFW metropolitan area during those years, increasing by 301,600 people, followed by Collin County, which added 282,100 people, and then Dallas and Denton Counties, which each added more than 240,000."

Median Age - Table AFH1, breaks down Lewisville's population by age groups over the span of a decade. Lewisville's median age increase is consistent with the overall age increase of the Dallas-Fort Worth-Arlington metropolitan area. The City's median age increased from 30.8 in 2010, to 33.2 in 2020. This increase in median age was driven by growth in the population of persons aged 60 years and older, which increased by almost 59%, from 8,457 to 13,425.

Population Density - Population density is examined by calculating the number of people who reside in one square mile. **Map AFH5** shows areas in the city with the highest number of people per square mile in 2016-2020, and **Map AFH6** shows the most populated areas in the city in 2006-2010. The central census tracts continue to be the most populated areas in Lewisville. The only noticeable difference in the past decade is that the population density in the southwest corner of the city has increased.

Race - The racial composition of the city has changed dramatically, see Table AFH2, with the population of people identifying as White (alone) dropping by nearly 25% while the population of people who identify as biracial or multiracial increasing by nearly 475%. The City's ethnic composition also changed over the past 10 years, with the population of people identifying as Hispanic or Latino growing at a faster rate than the percentage of people who did not identify as Hispanic or Latino (29% growth in population vs. 12.5% percent growth in population). The race and ethnicity trends at metro area level, see Table AFH4, are fairly similar to Lewisville, particularly the major increase in biracial or multiracial identities. The major distinctions between the metro area and city-level trends are that the Black and Latino population growth in the City is outpacing the metro area. Also, as mentioned earlier, Lewisville saw a steep decline in the White population of almost 25%, while the metro area experienced a modest 2% increase in the same timeframe.

Maps AFH7-8, depict the racial and ethnic concentration of residents across the city. Additionally, Maps AFH12-19 depict census tracts in the city where the percentage of residents of one race or ethnicity is significantly higher than the percentage of their total population citywide.

• **Black residents** – Currently, Black residents are concentrated in the census tracts that compose the Triangle neighborhood as well as in a census tract in the southeastern area of the City. Per the

- 2000 Census, Black residents were concentrated in the same southeastern census tract, but in no other areas of the City.
- Asian Residents Asian residents are currently concentrated in several census tracts in the southern parts of the City as well as in two census tracts in the far eastern area of the City. Per the 2000 census Asian residents used to be concentrated in two east-central census tracts, but this is no longer the case currently.
- White, non-Hispanic residents White, non-Hispanic residents are currently concentrated in census tracts located in the far western parts of the City. Per the 2000 Census, White, non-Hispanic residents were similarly concentrated in census tracts in the far western part of the City, but also were concentrated in one of the census tracts in the Triangle and in the southern part of the City.
- Persons of Hispanic or Latino ethnicity Persons of Hispanic or Latino ethnicity are currently concentrated in census tracts in the central and eastern part of the City bordering both sides of I-35. Per the 2000 Census, Hispanic or Latino residents were similarly concentrated in the central and eastern part of the City bordering both sides of I-35 as well as in one far southwestern census tract.

Individuals with a Disability - According to the 2016-2020 ACS, 9.4% of Lewisville's noninstitutionalized population has a disability, which is lower than the statewide percentage of 11.5%. There are more women with disabilities than men, 5,439 and 4,613 respectively. Further, the percentage of both men and women with a disability has increased since 2010 slightly. **Table AFH19** shows a breakdown of persons with a disability by age. Not surprisingly, a greater percentage of individuals above the age of 65 are disabled as compared to their younger peers. Thirty-six-point five percent (36.5%) of residents aged 65 and older are disabled. Disability rates in Lewisville closely mirror those of the Dallas-Fort Worth-Arlington Metro Area. The rates generally fall within a percentage point of the rates with the lone exception of the age group 75 years and over. Lewisville has a higher percentage of residents older than 75 with a disability (59.4%) compared to the Metro Area (48.8%).

The percentages of people with hearing, vision, cognitive, ambulatory, self-care, and independent living difficulty disabilities in Lewisville are fairly similar to the percentage of people in the Dallas-Fort Worth-Arlington, TX Metro Area (**Table AFH20**). The rates generally fall within a single percentage point of the rates of the Dallas-Ft Worth area, with the lone exception being Ambulatory Difficulty (4% of persons in Lewisville versus 5.26% in the region). Also, although the share of the City's population experiencing a disability for each of the six disabilities has remained fairly consistent since 2010 (**Table AFH21**), there are two noticeable exceptions to this trend. First is the rate of Cognitive Difficulty for residents 65 and older, which has increased by over seven percentage points and the Independent Living Difficulty for residents 65 and older, which has increased by over five percentage points.

Income – The median household income for Lewisville is \$67,026 according to ACS 2016-2020 data. The median income for the Dallas-Fort Worth-Arlington MSA is approximately \$70,281, which is higher than the Houston-The Woodlands-Sugar Land MSA (\$69,193) and the San Antonio MSA (\$62,355), but lower than the Austin-Round Rock MSA (\$80,954).

Lewisville's median household income rose by 22.8% over the past 10 years. Additionally, the percentage of households earning less than \$50,000 per year dropped by approximately 25%. On the other hand, for each income category above \$75,000, the percentage of households rose (**Table AFH23**).

Median Household Income Examined at the Census <u>Tract</u> Level — When median household income is compared across census tracts, it become evident that there are areas in the city in which both higher-income and lower-income households are concentrated. Map AFH24: Estimated Median Household Income shows that, for most households living in central Lewisville, their median household income is between \$40,000-\$66,000. Households with incomes above \$66,000 are primarily living west of I-35. Table AFH25: Median income by census tract shows that three census tracts in the city have median incomes above \$100,000. Two of the census tracts (217.30 and 217.31) are in the far western area of the city, while the other census tract (216.53) is located in the far eastern area of the city. In comparison, the two census tracts with the lowest median incomes are both in the Triangle neighborhood — census tract 217.34 has a median income of \$45,329 and census tract 217.39 has a median income of \$36,375.

Poverty - In spite of the fact that a larger percentage of households are currently earning over \$100,000 as compared to 2000, the percentage of people living in poverty has also increased.

Lewisville's poverty rate (10%) is lower than both the national average (14.2%) and the Dallas-Fort Worth-Arlington Metro Area poverty rate (11.1%). However, **Table AFH25: Poverty rate by age** reveals troubling data. Per the 2020 Census, 14.5% of all residents living in poverty were under the age of 18. The percentage of people in all three age groups (under 18 years, 18-64, and 65 years and over) who were living in poverty increased over the last decade. Incredibly worrisome is that the population of people aged 65 years and older who are living in poverty jumped by 474% during the past decade. Also, in the same timeframe, there was close to a 56% increase in households receiving food stamps.

Unemployment rate - Lewisville's unemployment rate of 3.4% parallels the Dallas-Fort Worth-Arlington Metro Area's unemployment rate of 3.2%. Lewisville's unemployment rate improved several percentage points since 2010 when the rate was at 6.8%. Further, according to the 2010 to 2020 Census, the unemployment rates for all racial groups dropped at least two percentage points, except for American Indian and Alaska Native residents.

The following tables and maps are used to supplement this analysis:

- **Table AFH1:** City population trends by age (2010 & 2020 Census)
- Table AFH2: City population trends by race (2010 & 2020 Census)
- Table AFH3: City population trends by ethnicity (2010 & 2020 Census)
- Table AFH4: Metro area population trends by race and ethnicity (2010 & 2020 Census)
- Map AFH5: Estimated number of people per square mile (2020 Census)
- Map AFH6: Estimated number of people per square mile (2010 Census)
- Map AFH7: Predominant racial or ethnic group (2013-2017 ACS, Census tract)
- Map AFH8: Predominant racial or ethnic group (2013-2017 ACS, Census block group)
- Map AFH9: Estimated percent of the population that is people of color (2016-2020 ACS)
- Map AFH10: Estimated percent of the population that is people of color (2011-2015 ACS)
- Map AFH11: Estimated percent of the population that is people of color (2006-2011 ACS)
- Map AFH12: Percent of all people who are Black or African American (2020 Census)
- Map AFH13: Percent of all people who are Black or African American (2010 Census)
- Map AFH14: Percent of all people who are Asian (2020 Census)
- Map AFH15: Percent of all people who are Asian (2010 Census)
- Map AFH16: Percent of all people who are non-Hispanic White (2020 Census)
- Map AFH17: Percent of all people who are non-Hispanic White (2010 Census)
- Map AFH18: Percent of all people who are Hispanic or Latino (2020 Census)
- Map AFH19: Percent of all people who are Hispanic or Latino (2010 Census)
- Table AFH20: Disability by age in city and metro area (2020 Census)
- Table AFH21: Disability by type in city and metro area (2020 Census)

- Table AFH22: Disability by type in city and metro area (2011-2015 ACS)
- Table AFH23: Median Household income trends (2010-2014 & 2016-2020 ACS)
- Map AFH24: Estimated median household income (2016-2020 ACS)
- Map AFH25: Median income by census tract (2016-2020 ACS)
- Table AFH26: Poverty rate by age (2010 & 2020 Census)

Table AFH1

	2010	Census	2020 Census		Percent Change
Population	Total Estimate	Percent Estimate	Total Estimate	Percent Estimate	(2010-2020)
TOTAL:	92,939		107,740		15.93%
AGE					
5 to 14 years	12,454	13.4%	14,657	13.6%	17.69%
15 to 17 years	3,718	4.0%	3,858	3.6%	3.78%
15 to 44 years	47,399	51.0%	51,330	47.6%	8.29%
18 years and over	68,310	73.5%	81,741	75.9%	19.66%
60 years and over	8,457	9.1%	13,425	12.5%	58.74%
65 years and over	5,390	5.8%	8,983	8.3%	66.65%
75 years and over	2,045	2.2%	3,605	3.3%	76.31%

Table AFH2

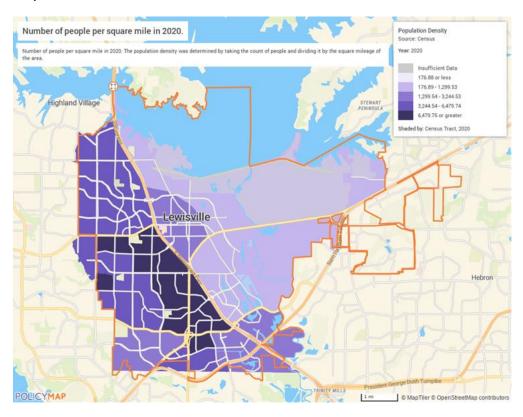
Population	2010 Census	Percent of Population	2020 Census	Percent of Population	Percent Change in Total Population Between 2010 & 2020
White alone	62,263	65.3%	46,844	41.9%	-24.8%
Black or African American alone	10,661	11.2%	17,699	15.8%	66.0%
American Indian and Alaska Native alone	623	0.7%	1,339	1.2%	114.9%
Asian alone	7,392	7.8%	12,638	11.3%	71.0%
Native Hawaiian and Other Pacific Islander alone	67	0.1%	86	0.1%	28.4%
Some Other Race alone	11,236	11.8%	15,747	14.1%	40.1%
Two or More Races	3,048	3.2%	17,469	15.6%	473.1%
Total:	95,290	100.0%	111,822	100.0%	17.3%

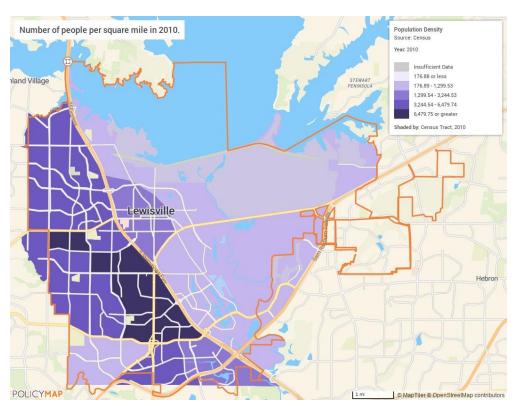
Table AFH3

Population	2010 Census	Percent of Population	2020 Census	Percent of Population	Percent Change in Total Population Between 2010 & 2020
Hispanic or Latino	27,783	29.2%	35,853	32.1%	29.0%
Not Hispanic or Latino:	67,507	70.8%	75,969	67.9%	12.5%
Total:	95,290	100.0%	111,822	100.0%	17.3%

Table AFH4

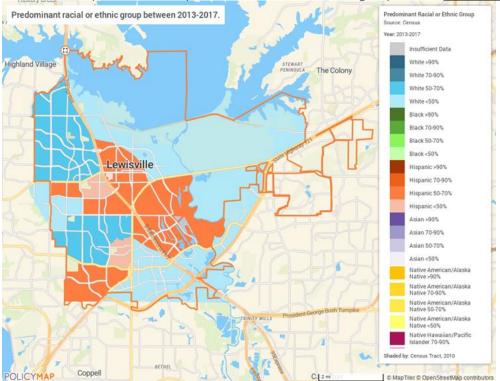
Dallas-Fort Worth-Arlington Metro Area Population	2010 Census	2020 Census	Percent Change (2010-2020)
Hispanic or Latino	1,752,166	2,235,234	27.57%
Not Hispanic or Latino	4,619,607	5,402,153	16.94%
White alone	3,201,677	3,266,374	2.02%
Black or African American alone	941,695	1,196,881	27.10%
American Indian and Alaska Native alone	24,758	25,958	4.85%
Asian alone	337,815	601,218	77.97%
Native Hawaiian and Other Pacific Islander alone	5,431	8,121	49.53%
Population of two or more races	99,182	273,347	175.60%



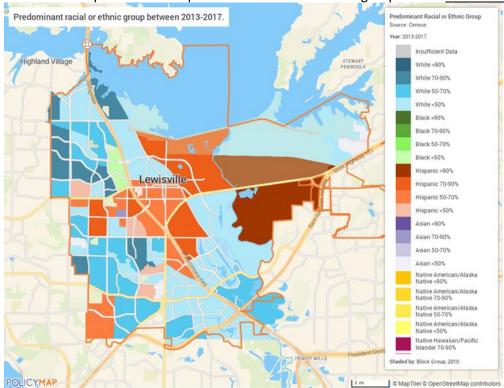


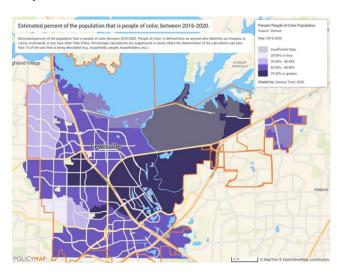
Map AFH7



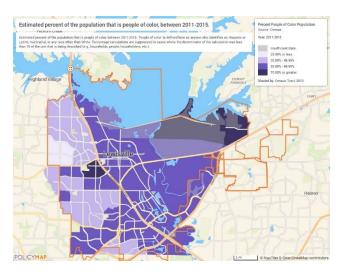


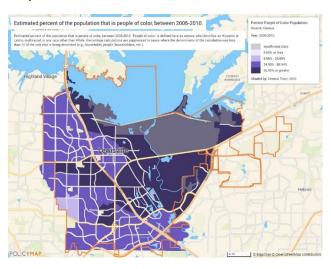
Note – This map examines the predominant racial or ethnic group in each <u>census block group</u>.





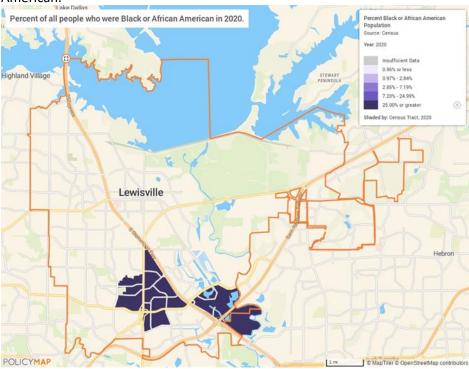
Map AFH10

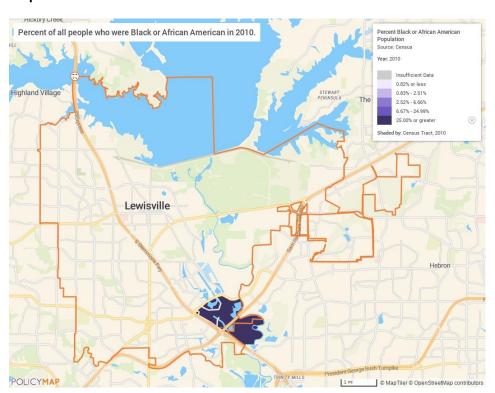




Map AFH12

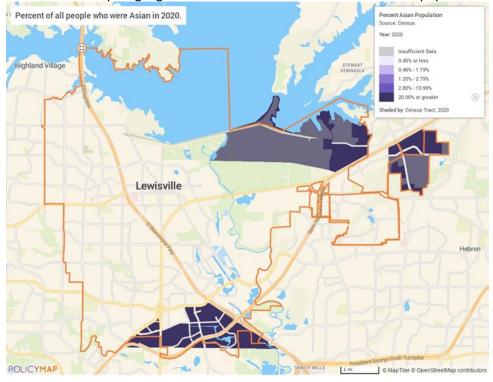
Note – These maps highlight census tracts where 25% or more of the population is Black or African American.

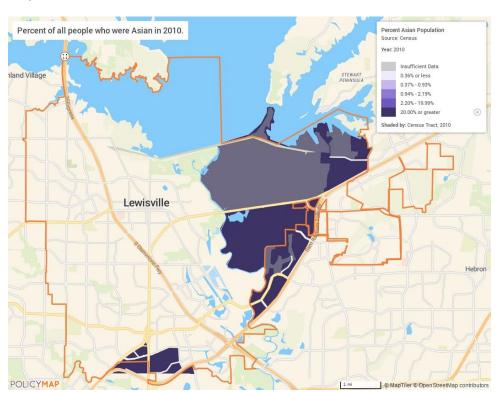




Map AFH14

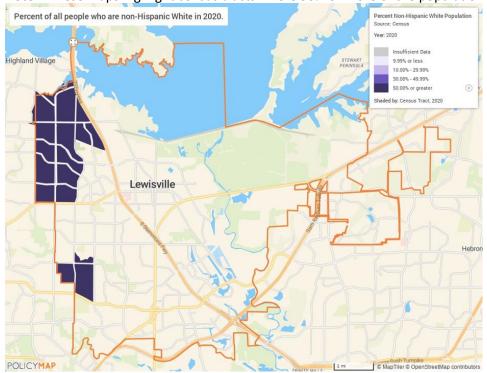
Note – These maps highlight census tracts where 20% or more of the population is Asian.

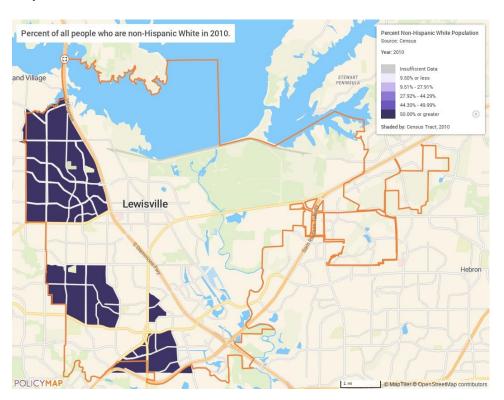




Map AFH16

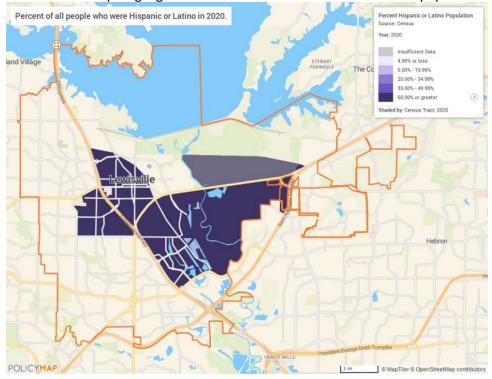
Note – These maps highlight census tracts where 50% or more of the population is non-Hispanic White.

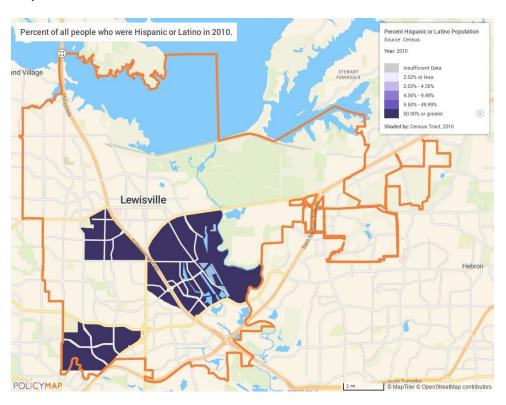




Map AFH18

Note – These maps highlight census tracts where 50% or more of the population is Hispanic or Latino.





		Disability by	Age (2020 Censu	ıs)				
	Le	ewisville city, Te	xas	Dallas-Fo	Dallas-Fort Worth-Arlington, TX Metro Area			
Age	Total	With a disability	% with a disability	Total	With a disability	% with a disability		
Under 5 years	7,484	12	0.2%	511,630	2,865	0.6%		
5 to 17 years	18,514	1,034	5.6%	1,422,511	66,900	4.7%		
18 to 34 years	31,226	1,816	5.8%	1,779,869	91,844	5.2%		
35 to 64 years	41,335	4,003	9.7%	2,868,052	271,357	9.5%		
65 to 74 years	5,327	1,169	21.9%	513,994	123,286	24.0%		
75 years and over	3,398	2,018	59.4%	306,731	149,626	48.8%		

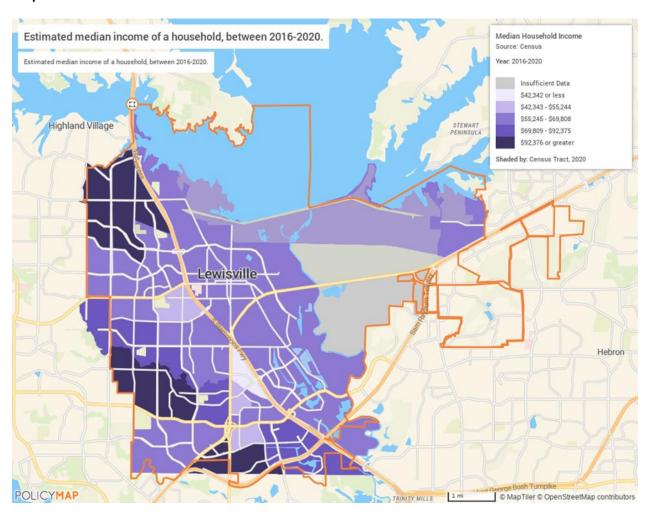
Table AFH21

	Disability by Ty	Disability by Type (2020 Census)									
Disability by Type	Lewisville cit	y, Texas	Dallas-Fort Worth-Arlington, TX Metro Area								
Disability by Type	With a disability	% with a disability	With a disability	% with a disability							
Hearing difficulty	1,882	1.8%	190,001	2.6%							
Vision difficulty	2,114	2.0%	144,525	2.0%							
Cognitive difficulty	4,338	4.3%	265,266	3.8%							
Ambulatory difficulty	4,687	4.7%	340,811	4.9%							
Self-care difficulty	1,651	1.7%	134,043	1.9%							
Independent living difficulty	3,532	4.3%	234,399	4.3%							

	Disability by Type (2011-2015 ACS)									
Disability by Type	Lewisville cit	y, Texas	Dallas-Fort Worth-Arlington, TX Metro Area							
Disability by Type	With a disability	% with a disability	With a disability	% with a disability						
Hearing difficulty	2,365	2.56%	171,390	2.75%						
Vision difficulty	1,010	1.09%	122,781	1.97%						
Cognitive difficulty	3,629	3.93%	240,395	3.86%						
Ambulatory difficulty	3,884	4.21%	329,090	5.29%						
Self-care difficulty	1,698	1.84%	128,838	2.07%						
Independent living difficulty	2,924	3.17%	215,790	3.47%						

Table AFH23

Household Income	2010-2014 ACS	2016-2020 ACS	Percent Change	
Total Households	36,282	39,664	9.3%	
Percentage of Population Earning				
Specific Range of Annual Income				
Less than \$10,000	2.60%	2.60%	0.0%	
\$10,000 to \$14,999	2.60%	2.30%	-11.5%	
\$15,000 to \$24,999	9.50%	6.50%	-31.6%	
\$25,000 to \$34,999	11.70%	8.70%	-25.6%	
\$35,000 to \$49,999	19.00%	14.10%	-25.8%	
\$50,000 to \$74,999	21.90%	21.50%	-1.8%	
\$75,000 to \$99,999	13.40%	15.40%	14.9%	
\$100,000 to \$149,999	13.00%	17.10%	31.5%	
\$150,000 to \$199,999	4.20%	7.80%	85.7%	
\$200,000 or more	2.00%	3.90%	95.0%	
Median income (dollars)	54,589	67,026	22.8%	
Mean income (dollars)	68,512	82,557	20.5%	



Census Tract	Estimated median household income	Census Tract	Census Tract Estimated median household income		Census Tract Census Tra		Estimated median household income
216.45	N/A	217.32	\$72,333	217.17	\$61,396		
217.30	\$114,234	217.42	\$70,882	217.35	\$60,953		
217.31	\$112,454	217.33	\$70,575	215.02	\$60,568		
216.53	\$102,554	216.19	\$69,554	217.28	\$59,590		
217.37	\$98,504	215.17	\$69,187	217.43	\$55,333		
215.05	\$97,452	216.20	\$68,824	217.36	\$54,222		
217.23	\$96,750	217.16	\$65,804	217.44	\$50,875		
217.15	\$95,586	217.45	\$65,272	217.34	\$45,329		
217.41	\$82,143	216.18	\$61,620	217.39	\$36,375		
217.38	\$74,750	217.40	\$61,577				

	Poverty Levels By Age												
		2010 Census				% Change							
Population for whom poverty status is determined		36,282			9.3%								
Age Group	Total Population	Below poverty level	Percent below poverty level	Total Population	Below poverty level	Percent below poverty level	% Change						
Under 18 years	23,010	2,401	10.40%	25,663	3,718	14.50%	54.9%						
18 to 64 years	65,924	4,278	6.50%	72,666	6,094	8.40%	42.4%						
65 years and over	6,401	147	2.30%	8,725	844	9.70%	474.1%						

General Issues Segregation/Integration Analysis

Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

Segregation Levels – One method of quantifying the racial and ethnic segregation levels of areas in the city and region is to apply the "dissimilarity index" to 2013-2017 American Community Survey data. PolicyMap describes the dissimilarity index as "an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity, 40-55 suggest moderate homogeneity, and higher index values above 55 suggest more heterogeneity." Identifying homogenous areas (lower dissimilarity indexes) can potentially help pinpoint areas of concentrated racial or ethnic populations. The Dissimilarity Index by census block group - Map AFH27 - depicts the most racially and ethnically homogenous areas of the city. The northeastern and central eastern areas shaded in the lightest purple have a dissimilarity index below 20 and also happen to be populated predominately by people of color (over 70% Hispanic or Latino population). The northwestern areas show a moderate amount of homogeneity, and they have a high concentration of non-Hispanic White residents (70-90%).

Another measure to observe potential segregation levels in the metro area and city is to examine the predominant racial or ethnic group, as is displayed in Map AFH7: Predominant racial or ethnic group (2013-2017 ACS, census tract) and Map AFH8: Predominant racial or ethnic group (2013-2017 ACS, census block group). Map AFH30: Predominant racial or ethnic group — metro area (2013-2017 ACS, Census block group), shows that the census tracts in smaller suburban cities and more rural areas tend to have a primarily White population, while census tracts with higher percentages of Hispanic and Black populations tend to be located within larger and mid-sized cities. Regarding Lewisville specifically, Map AFH7, reveals that persons of Hispanic or Latino ethnicity are more heavily represented in the central and eastern part of the city. Black residents are more heavily represented in the Triangle neighborhood as well as the southeastern parts of the city, whereas Asian residents are more heavily represented in the southern parts of the city as well as in far eastern area. Finally, White, non-Hispanic residents are more heavily represented in the far western parts of the city.

Foreign Born Residents - From 2010-2020, the percentage of foreign-born people in Lewisville (21.6%) and the Metro Area (18.5%) has not grown significantly (21.3% and 17.3% previously). However, **Maps AFH31-33**, which shows the areas with a high percentage of foreign-born residents from three different time periods (2006-2010, 2011-2015, and 2016-2020), shows that foreign-born residents have become more concentrated in six census tracts.

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

Housing Segregation — Maps AFH34 and AFH35 demonstrate the geographic concentrations of homeowners in Lewisville. Homeowners are more likely to be located in the central-west and north-west Lewisville census tracts which are located in predominately non-Hispanic White neighborhoods. In 2010, the southwestern census tract had a high rate of homeowners but it has now become an area that is primarily renter-occupied. This area has also seen an increase in Hispanic representation over the 2010-2020 timeframe. While homeowners in Lewisville are concentrated on the northwest census tracts, renters are more likely to be located in the east, south-east, and south census tracts. Maps AFH36 and AFH37 demonstrate the geographic concentrations of renters in Lewisville. Since 2010, Lewisville, like the greater region, has seen the share of renters increase. The Triangle neighborhood and southeastern census tracts, which have a high concentration of Black residents, are also neighborhoods that are over 90% renter-occupied.

Additionally, **Table AFH39** was created to analyze whether members of racial or ethnic groups are able to access homeownership opportunities in relative proportion to their population in Lewisville.

As review, 36.37% Lewisville residents identify themselves as White alone, 15.8% of residents identify themselves as Black or African American, and 11.3% of residents identify themselves as Asian. Slightly over 32% of Lewisville residents identify their ethnicity as Hispanic or Latino (of any race). About 14% of resident identify as Some Other Race.

However, the **Table AFH39** shows the White homeowner households are overrepresented as a total share of homeowner households while Black homeowners are underrepresented. Furthermore, there are census tracts that have a high share of Black, Asian, and Hispanic homeowner households, which may indicate that these protected classes are being steered towards or away from certain neighborhoods.

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

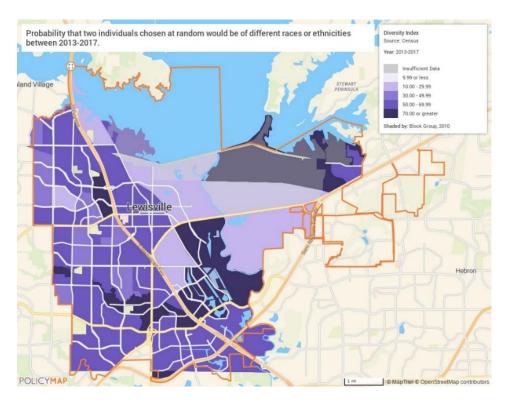
Numerous stakeholders noted that, for many years, Lewisville had been known as an "affordable" place to live where a low- or moderate-income person could locate numerous rental and for-sale housing opportunities within their budget. However, with rapidly rising rental rates and home sales prices, Lewisville no longer offers as many "affordable" housing opportunities. These rising housing prices could prevent low- and moderate-income persons from being able to move into Lewisville; some existing residents may also be priced out due to their inability to pay rising rents and some existing homeowners may be forced to sell their homes because they are unable to pay rising property tax bills.

The following tables and maps are used to supplement the analysis of the City's and region's population:

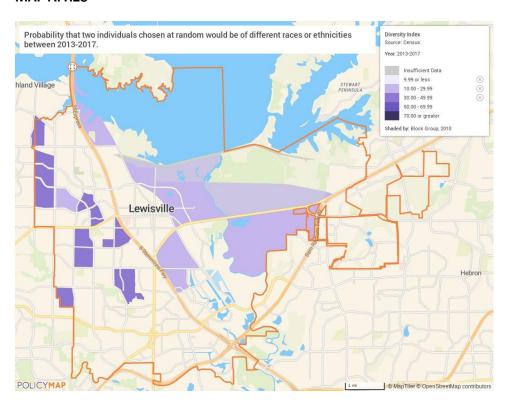
- Map AFH27: Dissimilarity Index (2013-2017 ACS, Census block group)
- Map AFH28: Dissimilarity Index shaded in include more homogenous areas (2013-2017 ACS, Census block group)
- Map AFH29: Dissimilarity Index in metro area (2013-2017 ACS, Census block group)
- Map AFH30: Predominant racial or ethnic group metro area (2013-2017 ACS, Census block group)

- Map AFH31: Percent foreign-born population (2016-2020 ACS)
- Map AFH32: Percent foreign-born population (2011-2015 ACS)
- Map AFH33: Percent foreign-born population (2006-2010 ACS)
- Map AFH34: Percent of households that own a home (2016-2020 ACS)
- Map AFH35: Percent of households that own a home (2010 Census)
- Map AFH36: Percent of households that rent a home (2016-2020 ACS)
- Map AFH37: Percent of households that rent a home (2010 Census)
- Map AFH38: Lewisville census tracts (2020 ACS)
- Map AFH39: Percent of households that own a home by race and ethnicity (2016-2020 ACS)

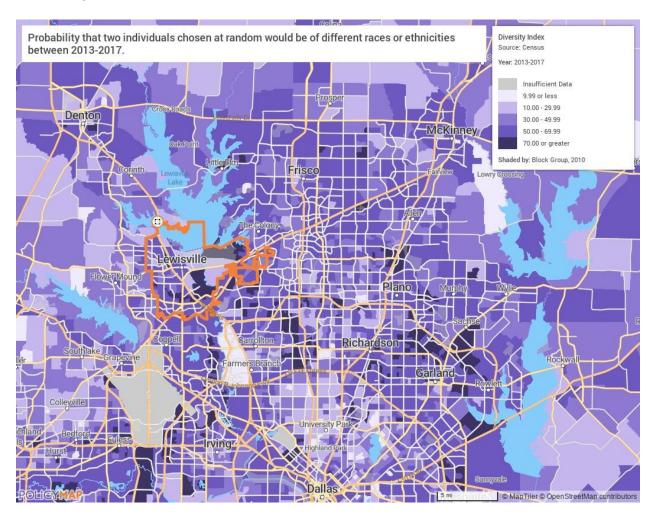
MAP AFH27

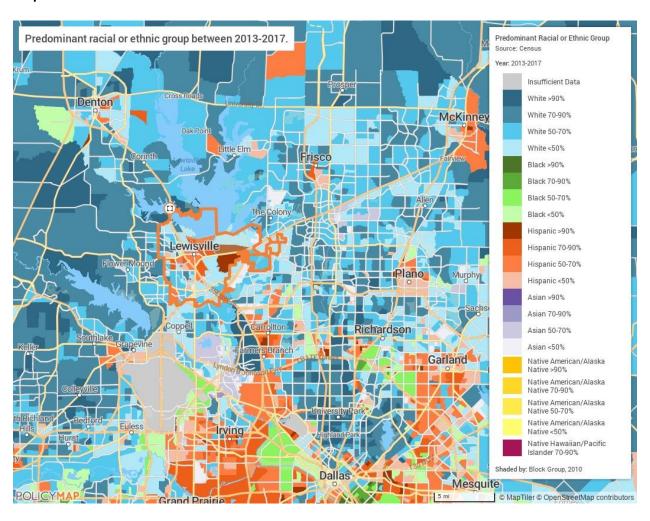


MAP AFH28

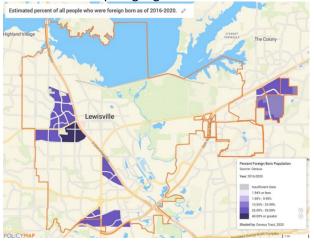


MAP AFH29

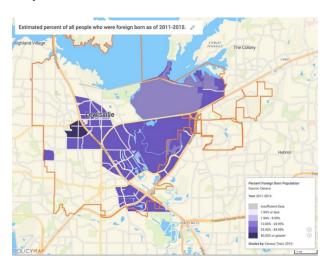


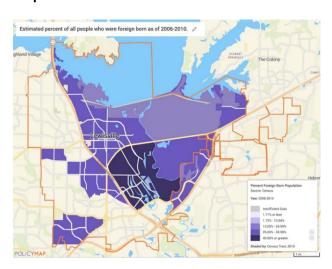


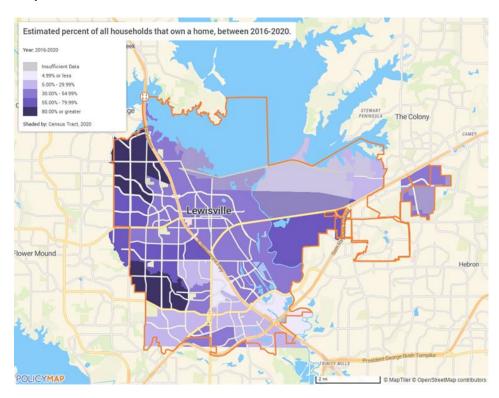
Note – These maps highlight census tracts where 25% or more of the population is foreign born.

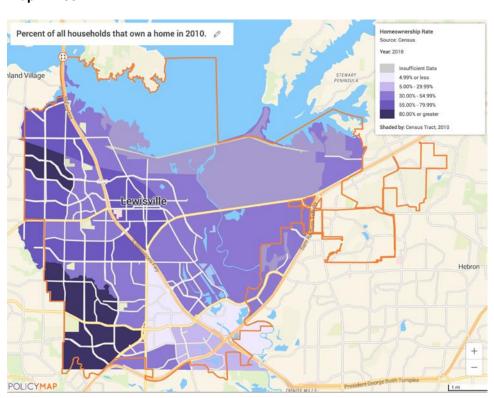


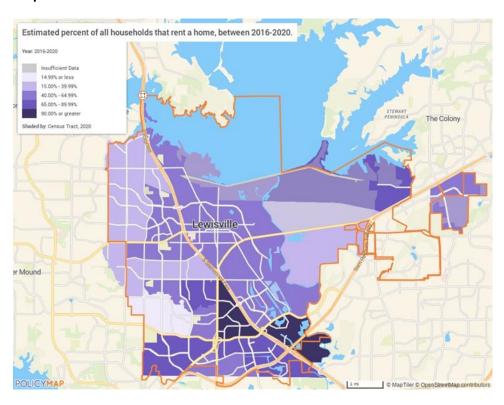
Map AFH32

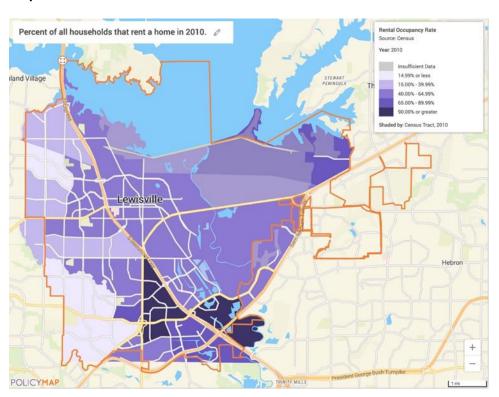












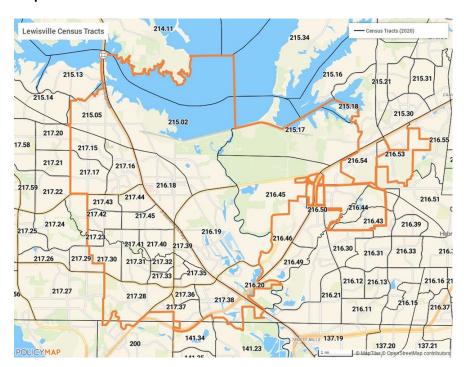


Table AFH39

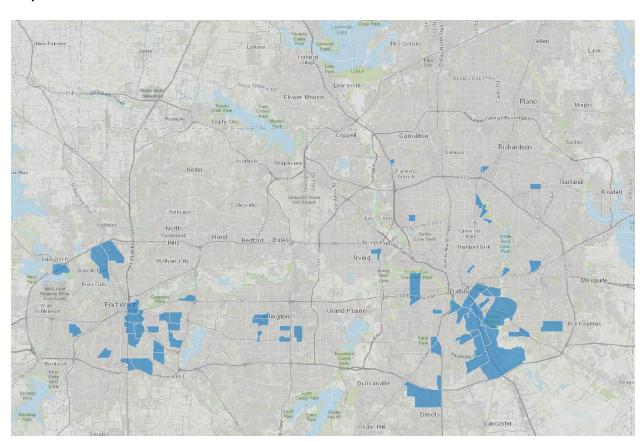
		поп	neownersn	ip by Race a	ina Ethinici	.y			
				Estimated Nur	mber of House	holds			
Census Tract	Total No. Households	White	% Total	Black or African American	%Total	Asian	% Total	Hispanic or Latino	% Tota
215.02	936	640	68.4%	14	1.5%	6	0.6%	276	29.5%
215.05	1,882	1,352	71.8%	127	6.7%	222	11.8%	181	9.6%
215.17	482	155	32.2%	70	14.5%	177	36.7%	80	16.6%
216.18	880	625	71.0%	75	8.5%	0	0.0%	180	20.5%
216.19	778	308	39.6%	0	0.0%	0	0.0%	470	60.4%
216.20	0	0	0.0%	0	0.0%	0	0.0%	0	0.0%
216.45	424	259	61.1%	0	0.0%	0	0.0%	165	38.9%
216.53	274	70	25.5%	0	0.0%	175	63.9%	29	10.6%
217.15	1,452	958	66.0%	177	12.2%	166	11.4%	151	10.4%
217.16	871	528	60.6%	27	3.1%	188	21.6%	128	14.7%
217.17	1,411	1,071	75.9%	34	2.4%	58	4.1%	248	17.6%
217.23	428	294	68.7%	53	12.4%	32	7.5%	49	11.4%
217.28	359	232	64.6%	0	0.0%	8	2.2%	119	33.1%
217.30	1,001	793	79.2%	77	7.7%	51	5.1%	80	8.0%
217.31	1,050	790	75.2%	102	9.7%	81	7.7%	77	7.3%
217.32	321	189	58.9%	16	5.0%	109	34.0%	7	2.2%
217.33	548	338	61.7%	36	6.6%	71	13.0%	103	18.89
217.34	10	0	0.0%	10	100.0%	0	0.0%	0	0.0%
217.35	143	75	52.4%	32	22.4%	36	25.2%	0	0.0%
217.36	111	72	64.9%	18	16.2%	21	18.9%	0	0.0%
217.37	979	489	49.9%	89	9.1%	159	16.2%	242	24.7%
217.38	381	200	52.5%	95	24.9%	74	19.4%	12	3.1%
217.39	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%
217.40	455	365	80.2%	0	0.0%	73	16.0%	17	3.7%
217.41	355	245	69.0%	43	12.1%	59	16.6%	8	2.3%
217.42	1,921	1,097	57.1%	63	3.3%	139	7.2%	622	32.4%
217.43	702	521	74.2%	29	4.1%	14	2.0%	138	19.79
217.44	730	453	62.1%	9	1.2%	5	0.7%	263	36.0%
217.45	1,168	691	59.2%	46	3.9%	37	3.2%	394	33.7%
	20.053	12,811	63.9%	1.242	6.2%	1.961	9.8%	4.039	20.19

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

HUD defines the criterion that must be met for an area to be considered a Racially or Ethnically Concentrated Area of Poverty R/ECAP). HUD states:

To assist communities in identifying racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

The City of Lewisville does not have any R/ECAPs. However, in the region, there are numerous R/ECAPs in the larger cities of Dallas, Fort Worth, and Arlington.



Disparities in Access to Opportunity

Education

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

Note – The City of Lewisville has chosen to use data supplied by the Texas Education Agency (TEA), rather than HUD, because the TEA data is more recent.

Lewisville ISD serves about 50,000 students and operates 62 schools. According to the most-recently published Texas Education Agency Accountability Ratings (2018-2019), Lewisville was rated a B. School scoring site Niche granted Lewisville ISD an A. The district has higher than state average:

- graduation rates (overall as well as for each demographic group for which information is gathered and reported),
- teacher pay and years of teacher experience,
- gifted and talented, special education, and AP/IB enrollment, and
- standardized testing scores.

The strength of the school district, coupled with the relative affordability of housing in Lewisville over the past decade, have been strong draws for people seeking to buy and rent homes in Lewisville.

As displayed in **Maps AFH41-42**, the percentage of school-aged children enrolled in public schools is high across all census tracts in the City, which is another indicator of the proficiency of the school system. When compared to the metro area, especially the City of Dallas, Lewisville's public school enrollment percentage is striking.

When comparing Lewisville ISD to nearby Denton ISD, Lewisville ISD students performed better on the most recent statewide standardized test, the STAAR. Seventy-seven (77%) of LISD students were rated "Approaches Grade Level or Above" whereas 69% of Denton ISD students achieved that rating. Similarly, 27% of LISD students were rated "Masters Grade Level" whereas 18% of Denton students achieved that rating. Denton ISD has a higher percentage of economically disadvantaged students (47.8%) compared to LISD (31.4%).

When comparing the achievement of students by race, ethnicity, Limited English Proficiency (LEP) and special education status, LISD students consistently outperform their counterparts in Denton ISD, although the outperformance is slight in many instances. For example, the percentages of students rated "Approaches Grade Level or Above" in LISD is as follows: 59% of African American students, 65% of Hispanic students, 88% of White students, 89% of Asian students, 51% of English Language Learners, and 49% of special education students. Comparatively, the percentages of students rated "Approaches Grade Level or Above" in Denton ISD is as follows: 55% of African American students, 61% of Hispanic students, 80% of White students, 85% of Asian students, 50% of English Language Learners, and 37% of special education students.

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

As a general pattern, **Map AFH 48** shows that high performing schools are most accessible to residents of western Lewisville, but this is partially because most of the population and schools are concentrated in that area of the city. Lower performing schools are located directly to the west of I-35 as well as in a cluster at the northeast corner of the city. The lower performing schools' locations also correspond with higher percentages of Black and Hispanic residents in poverty.

All residents of Lewisville are within about 3 miles of a high performing school. In terms of educational implications, this means that particular races or ethnicities do not encounter significant geographical barriers to accessing high performing schools. However, high performing schools are clustered in the area west of I-35, so residents east of the highway (where there are larger shares of residents in poverty) have to travel further by comparison to reach high performing schools.

Lewisville ISD assigns students to schools based solely on the student's home address. Students who do not want to attend their neighborhood school can request a transfer. However, the transfer requirements are extremely stringent. Specifically, a student must meet all of the following criteria in order to be eligible for a transfer:

- In the prior year, the student had no more than 8 unexcused absences and no more than 10 unexcused late arrivals to school and total attendance was 90% or better,
- In the prior year, the student was not expelled or placed at DAEP, and did not engage in persistent misbehavior (3 or more office referrals), and
- Passing all classes (most recent semester for secondary, most recent yearly average for elementary).

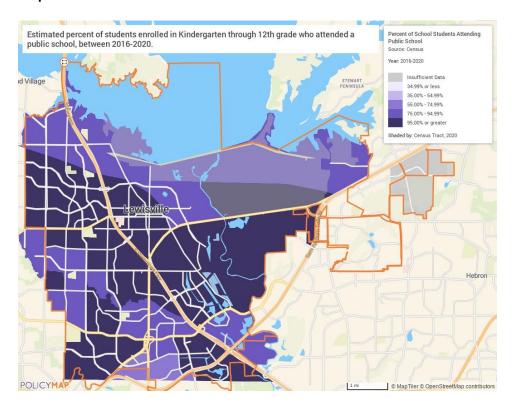
Table AFH49 provides a snapshot of how residential living patterns in Lewisville impact the racial, ethnic, and socio-economic composition of schools, which in turn, may impact student performance. **Table AFH49** compares 3 elementary schools, Parkway, Valley Ridge, and Lewisville elementary schools. Parkway ES is located in southeastern Lewisville, while Valley Ridge ES is located on the northwestern border of the city, and Lewisville ES is located just west of I-35 near the Triangle area. The data regarding racial, ethnic, and socio-economic composition of schools, along with student performance shows that – at least when comparing these 3 schools – there is a wide variation in school performance at schools depending upon the concentration of economically disadvantaged students at the school. Lewisville ES, which has 77% of students who are economically disadvantaged, had only 45% of students who were rated as "Approaches Grade Level" whereas Valley Ridge ES, which has a much lower percentage of economically disadvantaged students (36%), had a much higher percentage of students who were rated as "Approaches Grade Level" (66%).

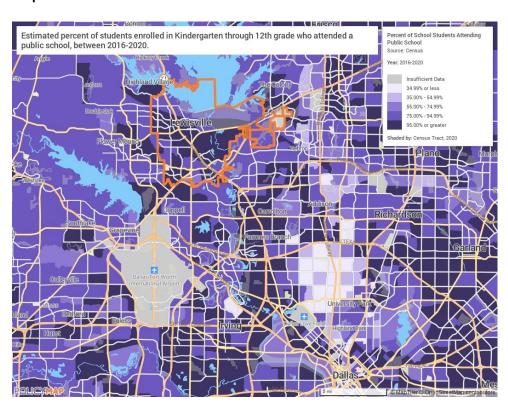
Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

Residents reported that, in recent public meetings held to discuss school attendance zone boundaries, community members voiced opposition to boundary zone changes that would zone children from lower-income neighborhoods into schools that traditionally served low percentages of economically disadvantaged students.

The following tables and maps are used to supplement the analysis of the City's and region's education system:

- Map AFH41: Percent of students enrolled in Kindergarten through 12th grade who attended a public school (2016-2020 ACS)
- Map AFH42: Percent of students enrolled in Kindergarten through 12th grade who attended a public school metro area (2016-2020 ACS)
- **Table AFH43:** School District Performance Lewisville ISD and Denton ISD (Texas Education Agency 2021)
- Table AFH44: 2021 STAAR Performance Lewisville ISD (Texas Education Agency 2021)
- Table AFH45: 2021 STAAR Performance Denton ISD (Texas Education Agency 2021)
- Map AFH46: Lewisville School Locations (Lewisville ISD 2022)
- Map AFH47: Lewisville Attendance Zone Boundaries (Lewisville ISD 2022)
- Map AFH48: Lewisville School Ratings (Niche.com 2022)
- **Table AFH49:** Lewisville ISD School Comparison Parkway, Valley Ridge, Lewisville ES (Lewisville ISD 2022)





	Lewisville ISD	Denton ISD
Performance		
Overall Accountability Rating	Not Rated / COVID	Not Rated / COVID
Approaches Grade Level or Above	77%	69%
Meets Grade Level or Above	54%	42%
Masters Grade Level	27%	18%
Academic Growth	N/A - COVID	N/A - COVID
Graduation Rates	4-Year: 96.3% 5-Year: 97.4% 6-Year: 97.1%	4-Year: 97.1% 5-Year: 98.4% 6-Year: 98.0%
College, Career, or Military Readiness	68%	63%
Student Information		
Total Enrollment	49,253	30,189
% Economically Disadvantaged	31.4%	47.8%
% Receiving Special Education Services	15.2%	12.4%
% Emergent Bilingual/English Learner	19.4%	17.0%
% African American	11.6%	18.5%
% Asian	15.5%	3.3%
% Hispanic	30.5%	33.7%
% American Indian	0.4%	0.5%
% Pacific Islander	0.1%	0.2%
% Two or More Races	4.4%	2.7%
% White	37.6%	41.2%

Texas Education Agency

2021 STAAR Performance

LEWISVILLE ISD (061902) - DENTON COUNTY

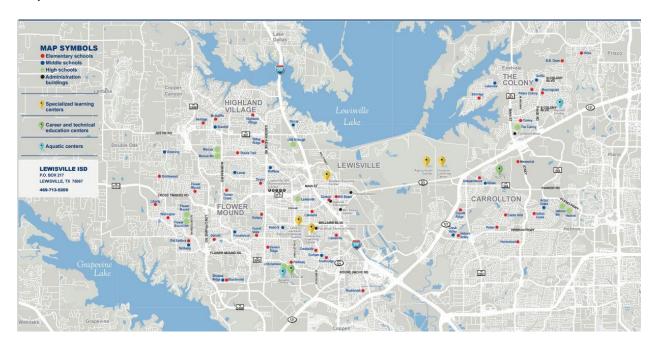
								T				0	Ou saist	0	Non-
	All	African			American		Pacific	Two or More	Econ	EL	EL (Current &	Special Ed	Special Ed	Continu- ously	Continu- ously
	Students	American	Hispanic	White	Indian	Asian	Islander	Races	Disadv	(Current)	Monitored)	(Current)	(Former)	Enrolled	Enrolled
						All Subje	cts								
Percent of Tests															
At Approaches GL Standard or Above	77%	59%	65%	88%	77%	89%	68%	79%	59%	51%	58%	49%	85%	79%	
At Meets GL Standard or Above	54%	31%	37%	67%	52%	72%	48%	58%	31%	21%	29%	26%	59%	56%	
At Masters GL Standard	27%	10%	14%	35%	26%	45%	14%	31%	11%	7%	11%	10%	30%	29%	22%
Number of Tests															
At Approaches GL Standard or Above	54,362	4,367	14,065	24,465	222	9,034	44	2,162	13,516	6,607	9,008	5,753	1,076	43,022	11,340
At Meets GL Standard or Above	37,953	2,289	8,012	18,558	151	7,317	31	1,592	7,051	2,734	4,454	3,057	748	30,555	7,398
At Masters GL Standard	19,089	748	3,102	9,745	74	4,551	9	857	2,426	859	1,650	1,178	376	15,597	3,492
Total Tests	70,156	7,390	21,790	27,749	290	10,117	65	2,751	22,841	12,924	15,558	11,736	1,269	54,278	15,878
Participation															
% participation 2018-19	100%	99%	100%	99%	100%	100%	100%	100%	99%	100%	100%	99%	100%	100%	99%
% participation 2020-21	87%	79%	89%	90%	88%	81%	84%	83%	88%	91%	90%	87%	88%	88%	84%
					E	LA/Read	ing								
Percent of Tests															
At Approaches GL Standard or Above	78%	62%	65%	89%	74%	88%	70%	80%	60%	50%	58%	47%	84%	80%	72%
At Meets GL Standard or Above	57%	36%	41%	70%	54%	73%	44%	61%	34%	22%	31%	26%	61%	59%	50%
At Masters GL Standard	27%	11%	15%	35%	25%	45%	11%	32%	11%	6%	10%	9%	29%	29%	23%
Number of Tests															
At Approaches GL Standard or Above	20,398	1,750	5,355	9,032	78	3,337	19	826	5,250	2,512	3,425	2,085	407	16,084	4,314
At Meets GL Standard or Above	14,989	1,013	3,353	7,161	57	2,757	12	635	2,980	1,116	1,818	1,160	293	12,004	2,985
At Masters GL Standard	7,184	311	1,202	3,609	27	1,704	3	327	927	293	605	416	142	5,832	1,352
Total Tests	26,181	2,814	8.214	10,200	106	3,782	27	1,036	8,682	4,985	5,954	4,434	482	20,214	5,967
Participation															
% participation 2018-19	100%	99%	100%	100%	100%	100%	100%	100%	100%	100%	100%	99%	100%	100%	99%
% participation 2020-21	88%	80%	90%	91%	87%	82%	88%	83%	89%	92%	91%	88%	89%	89%	85%
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,						lathemat									
Percent of Tests															
At Approaches GL Standard or Above	76%	52%	63%	87%	77%	90%	68%	76%	57%	54%	60%	51%	84%	78%	69%
At Meets GL Standard or Above	49%	22%	31%	63%	49%	72%	50%	53%	26%	22%	29%	25%	58%	52%	
At Masters GL Standard	26%	7%	12%	33%	25%	46%	18%	30%	10%	9%	13%	11%	32%	27%	
Number of Tests	2070	7 70	1270	0070	2070	4070	1070	0070	1070	070	1070	1170	0270	2170	217
At Approaches GL Standard or Above	16,247	1,174	4.192	7,346	70	2,792	15	657	4,068	2,245	2.962	1.947	339	12.901	3,346
At Meets GL Standard or Above	10,611	489	2,079	5,286	45	2,244	11	456	1,843	928	1,430	964	234	8,592	
At Masters GL Standard	5,552	159	829	2,830	23	1,449	4	257	692	359	631	420	129	4,521	1,03
Total Tests	21,466	2,255	6,659	8,453	91	3,119	22	866	7,132	4,137	4,949	3,814	402	16,601	4,865
Participation	21,400	2,233	0,009	0,733	91	3,119	22	000	1,132	7,137	7,545	3,014	702	10,001	7,000
% participation 2018-19	99%	100%	99%	99%	99%	100%	100%	100%	100%	100%	100%	100%	100%	99%	99%
•	99% 87%	78%	89%	91%	99%	83%	85%	83%	88%	91%	90%	87%	88%	88%	
% participation 2020-21	01%	10%	09%	9170	90%	03%	00%	03%	00%	91%	90%	07%	00%	00%	05%

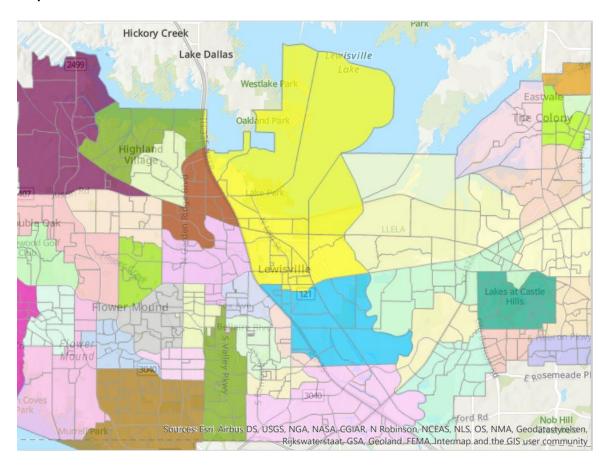
Texas Education Agency

2021 STAAR Performance

DENTON ISD (061901) - DENTON COUNTY

								Two or			EL	Special	Special	Continu-	Non- Continu-
	All	African			American		Pacific	ic More	Econ	EL	(Current &	Ed	Ed	ously	ously
	Students	Students American Hispanic White			Indian Asian Islander Races Disadv (Current) M All Subjects				Monitored)	(Current)	(Former)	Enrolled	Enrolled		
Percent of Tests					•	an Subjet	,15								
At Approaches GL Standard or Above	69%	55%	61%	80%	79%	85%	75%	67%	56%	50%	56%	37%	68%	72%	62%
At Meets GL Standard or Above	42%	28%	32%	55%	47%	63%	40%	40%	27%	20%	26%	19%	37%	45%	
At Masters GL Standard	18%	9%	12%	26%	16%	33%	14%	20%	9%	6%	9%	7%	13%	20%	
Number of Tests															
At Approaches GL Standard or Above	31,991	4,839	9.613	15,341	229	1,290	79	600	12,201	3,863	4,934	2.144	869	23,830	8,16
At Meets GL Standard or Above	19,320	2,425	4,979	10,420	135	964	42		5,952	1,565	2,302	1,110	473	14,837	4,48
At Masters GL Standard	8,269	828	1,822	4,878	47	504	15	175	2,022	491	781	395	168	6,500	
Total Tests	46,344	8,812	15,641	19,078	289	1,526	106	892	21,883	7,689	8,878	5,868	1,270	33,198	13,146
Participation	-,-	-,-	-,-			, -			,	,	.,.	,	,		
% participation 2018-19	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	99%	100%	100%	100%
% participation 2020-21	94%	92%	95%	93%	94%	95%	98%	94%	93%	97%	97%	93%	93%	94%	929
					E	LA/Read	ina								
Percent of Tests							•								
At Approaches GL Standard or Above	71%	59%	64%	81%	79%	84%	77%	69%	58%	51%	56%	36%	71%	73%	649
At Meets GL Standard or Above	46%	33%	36%	59%	56%	64%	49%	44%	31%	22%	28%	18%	38%	49%	39%
At Masters GL Standard	19%	11%	13%	27%	16%	33%	11%	24%	10%	6%	9%	6%	14%	20%	169
Number of Tests															
At Approaches GL Standard or Above	12,149	1,916	3,707	5,711	85	491	27	212	4,735	1,493	1,895	783	339	9,022	3,12
At Meets GL Standard or Above	7,899	1,081	2,109	4,125	60	373	17	134	2,560	641	945	400	182	5,987	1,91
At Masters GL Standard	3,293	352	730	1,926	17	190	4	74	841	190	297	129	65	2,522	77
Total Tests	17,176	3,271	5,824	7,047	107	584	35	308	8,162	2,925	3,357	2,185	479	12,325	4,85
Participation															
% participation 2018-19	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	99%	100%	100%	100%
% participation 2020-21	94%	93%	95%	94%	97%	96%	97%	94%	94%	97%	96%	93%	94%	95%	93%
· ·					N	lathemat	ics								
Percent of Tests															
At Approaches GL Standard or Above	67%	49%	60%	79%	75%	87%	66%	69%	53%	55%	59%	37%	69%	70%	59%
At Meets GL Standard or Above	37%	20%	27%	49%	39%	65%	28%	40%	22%	23%	27%	19%	36%	40%	29%
At Masters GL Standard	16%	7%	11%	23%	15%	36%	9%	20%	8%	9%	11%	8%	14%	18%	129
Number of Tests															
At Approaches GL Standard or Above	9,625	1,334	2,904	4,690	59	400	21	217	3,622	1,374	1,652	704	291	7,209	2,41
At Meets GL Standard or Above	5,289	557	1,319	2,949	31	298	9	126	1,538	569	746	361	154	4,118	1,17
At Masters GL Standard	2,360	198	528	1,391	12	164	3	64	565	215	309	149	60	1,878	48
Total Tests	14,396	2,723	4,822	5,964	79	460	32	316	6,860	2,476	2,792	1,887	422	10,297	4,09
Participation															
% participation 2018-19	100%	100%	100%	100%	100%	100%	100%	99%	100%	100%	100%	100%	100%	100%	100%
% participation 2020-21	94%	93%	95%	94%	96%	94%	97%	94%	94%	97%	97%	94%	94%	95%	93%







	Parkway Elem	Valley Ridge Elem	Lewisville Elem		
Performance					
Overall Accountability Rating	Not Rated / COVID	Not Rated / COVID	Not Rated / COVID		
Approaches Grade Level or Above	60%	66%	45%		
Meets Grade Level or Above	30%	38%	17%		
Masters Grade Level	16%	19%	8%		
Academic Growth	N/A - COVID	N/A - COVID	N/A - COVID		
Student Informati	on	20			
Total Enrollment	556	527	550		
% Economically Disadvantaged	57.0%	35.7%	77.1%		
% Emergent Bilingual/English Learner	58.1%	10.2%	48.5%		
% African American	10.3%	19.0%	24.2%		
% Asian	12.2%	7.0%	2.2%		
% Hispanic	55.4%	30.6%	60.9%		
% American Indian	0.4%	0.4%	0.5%		
% Pacific Islander	0.2%	0.4%	0.5%		
% Two or More Races	5.0%	6.5%	5.8%		
% White	16.5%	36.2%	5.8%		

^{*} Indicates results are masked due to small numbers to protect student confidentiality.

Employment

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

The HUD labor market index measures disparities in access to job opportunity by combining multiple factors that could affect access such as a census tract's unemployment rate, labor-force participation rate, and percent of the population over the age of 25 with a bachelor's degree. Lewisville's labor force participation rate for all groups is higher than the national average. Notably, Black residents have the second highest labor force participation rate and the highest unemployment rate, which is slightly above the overall unemployment rate of 3.4%. Female labor force participation rate is about 10% lower than male labor participation rate, with the greatest difference for females who are raising at least one child under the age of 17. However, fact that the unemployment rate for those with children is lower than the overall unemployment rate indicates a general accessibility to the labor market for this group. Unemployment rates for those below the poverty level and those with disabilities are higher than the overall unemployment rate in the city.

HUD calculates a job proximity index and labor market index for jurisdictions that can be used to identify areas of disparate need. HUD's Labor Market Engagement Index attempts to capture the labor capacity in a neighborhood by using as inputs the level of labor market participation, unemployment rate, and educational attainment in a census tract. A higher score indicates a higher level of labor force participation and human capital in a neighborhood.

Labor Market Index - The Labor Market Index for all groups and income levels is higher in Lewisville than in the region – that is, neighborhoods in Lewisville tend to have residents who are more likely to be engaged in the labor market and have higher levels of education. The significance of these differences illustrates that Lewisville remains a place with greater opportunity for members of protected classes. For instance, the index is higher in Lewisville for total populations of Asian, Black, and Native Americans than for White residents. This is a feature of education level as well as choice (or in some cases, lack thereof) in neighborhood of residence. For the population below the poverty level, however, the scores tend to fall more clearly along racial lines.

Jobs Proximity Index - The Jobs Proximity Index measures the accessibility of all jobs from a given block group — a higher index indicates that residents of the study area have access to more jobs. Lewisville residents have similar levels of geographical accessibility to jobs as compared to residents in the DFW region. For Black and Native American residents, the scores in Lewisville are slightly higher, indicating their opportunities for job access are somewhat greater in Lewisville than in the larger region. When looking at the population below the federal poverty line, however, it is apparent that Lewisville offers overall greater job access than the MSA for Black, Hispanic, and Asian residents. For White residents, the index is roughly the same, while it is only significantly lower for Native American residents.

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

Only about 6,000 of the roughly 65,000 labor market participants in the city of Lewisville both live and work in the city. Thus, the areas in the City with the highest scores on the HUD Labor Market Index are located on the outer edges of the city – as we would expect of a city that relies largely on out-of-jurisdiction entities to employ its residents. According to the HUD Labor Market Index, families with children are well represented in areas with a high labor market index. When examining foreign-born

residents, persons from Mexico represent the largest share of foreign-born residents of Lewisville. The tool also shows residents from Mexico are disproportionately located in areas with lower labor market indices; Mexican-born residents of Lewisville are more likely to reside in low job opportunity areas. In terms of race and ethnicity, areas with high labor market indices appear to be diverse, particularly on the southern and western edges of the city.

The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region or MSA. Hispanic and Black residents appear to be more represented in the job proximate areas in the center of the city, non-Hispanic White residents appear to predominate in the job proximate areas in the northern and western parts of the city, while Black and Asian residents tend to predominate the job proximate tracts in the southern edge of the city. This could say much about settlement preferences and patterns as well as the types of jobs that are available within the city as opposed to outside of it.

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

When analyzing an individual's access to the labor market and nearby job opportunities, it is also important to understand what types of jobs and compensation available. This has a bearing on fair housing issues because of the connection between an individual's employment as an income source being a factor in their ability to access quality housing options. Individuals who are underemployed are defined as those who are involuntarily working part-time or on a temporary basis, or who are overqualified for their current position. Underemployment can create financial uncertainty and result in housing insecurity. The prevalence of underemployment has been shown to be highest in minority communities. A 2016 study by the Bureau of Labor Statistics found that Hispanics, both native and foreign born, tend to have the highest rates of involuntary part-time underemployment compared to other race/ethnic groups in the U.S. https://www.bls.gov/opub/mlr/2016/article/pdf/underemployment-among-hispanics.pdf. A lack of education level and job skills were cited as key reasons for underemployment which may explain some of the lower Labor Market Index scores for majority-Hispanic communities in the city.

The following tables and maps are used to supplement the analysis of the City's and region's employment opportunities:

- **Table AFH50:** Labor force participation and unemployment rates by race and ethnicity (2016-2020 ACS)
- Table AFH51: Labor force participation and unemployment rates by sex (2016-2020 ACS)
- Table AFH52: Labor force participation and unemployment rates by poverty and disability status (2016-2020 ACS)
- **Table AFH53:** Labor market index (HUD AFFHT0006)
- Table AFH54: Jobs proximity index (HUD AFFHT0006)
- Graphic AFH55: Inflow/outflow of workers (LEHD 2019)
- Graphic AFH56: Job Access Score (Center for Neighborhood Technology)
- Map AFH57: Labor market index by race and ethnicity (HUD AFFHT0006)
- Map AFH58: Labor market index by national origin (HUD AFFHT0006)
- Map AFH59: Labor market index by family status (HUD AFFHT0006)

- Map AFH60: Jobs proximity index by race and ethnicity (HUD AFFHT0006)
- Map AFH61: Jobs proximity index by national origin (HUD AFFHT0006)
- Map AFH62: Jobs proximity index by family status (HUD AFFHT0006)

	EMPLOYMENT STATUS										
	Total	Labor Force Participation Rate	Employment/Population Ratio	Unemployment rate							
RACE AND HISPANIC OR LATINO											
ORIGIN											
White alone	54,251	74.8%	72.3%	3.2%							
Black or African American alone	11,245	85.0%	81.0%	4.6%							
American Indian and Alaska											
Native alone	426	74.2%	73.9%	0.3%							
Asian alone	9,472	73.1%	70.5%	3.6%							
Native Hawaiian and Other											
Pacific Islander alone	135	100.0%	100.0%	0.0%							
Some other race alone	3,700	75.9%	72.9%	3.8%							
Two or more races	5,245	80.3%	78.2%	2.0%							
Hispanic or Latino origin (of any											
race)	23,733	78.0%	76.6%	1.7%							
White alone, not Hispanic or											
Latino	37,667	73.1%	70.0%	4.0%							

Table AFH51

	EMPLOYMENT STATUS				
	Total	Labor Force Participation Rate	Employment/Population Ratio	Unemployment rate	
SEX					
Male	34,776	91.0%	87.8%	3.2%	
Female	35,516	80.6%	78.4%	2.8%	
With own children under 18					
years	12,440	75.0%	73.2%	2.4%	
With own children under 6					
years only	2,669	75.1%	73.1%	2.7%	
With own children under 6					
years and 6 to 17 years	3,065	59.0%	58.1%	1.4%	
With own children 6 to 17					
years only	6,706	82.3%	80.2%	2.6%	

	EMPLOYMENT STATUS				
	Total	Labor Force Participation Rate	Employment/Population Ratio	Unemployment rate	
POVERTY STATUS IN THE PAST 12 MONTHS					
Below poverty level	5,622	61.50%	56.90%	7.60%	
At or above the poverty level	64,582	88.00%	85.40%	2.80%	
DISABILITY STATUS					
With any disability	5,653	62.10%	57.10%	8.00%	

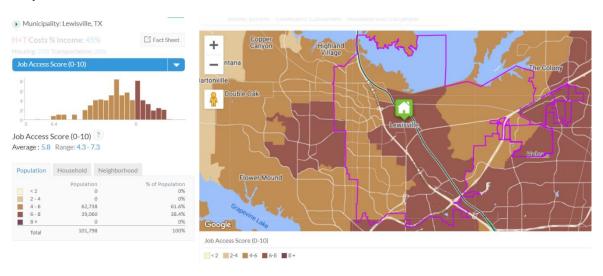
Labor Market Index					
(Lewisville, TX CDBG) Jurisdiction	Lewisville	Dallas-Fort Worth-			
Total Population	Lewisville	Arlington			
White, Non-Hispanic	75.08	67.57			
Black, Non-Hispanic	75.86	47.43			
Hispanic	67.22	45.88			
Asian or Pacific Islander, Non-Hispanic	80.05	74.22			
Native American, Non-Hispanic	75.14	59.68			
Population below federal poverty line					
White, Non-Hispanic	75.13	54.67			
Black, Non-Hispanic	65.86	33.78			
Hispanic	63.55	39.32			
Asian or Pacific Islander, Non-Hispanic	74.89	61.88			
Native American, Non-Hispanic	64.83	43.77			

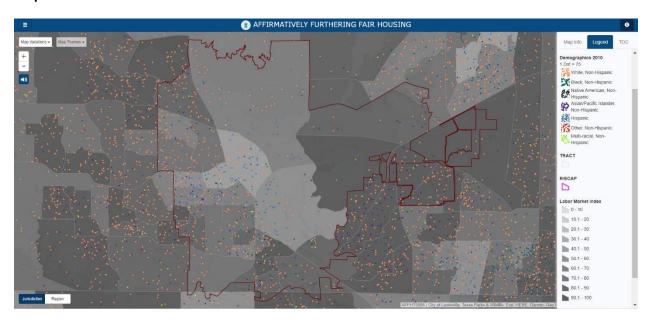
Jobs Proximity Index					
	Lewisville	Dallas-Fort Worth- Arlington			
Total Population					
White, Non-Hispanic	40.25	42.17			
Black, Non-Hispanic	47.00	41.92			
Hispanic	47.49	50.36			
Asian or Pacific Islander, Non-Hispanic	44.96	48.33			
Native American, Non-Hispanic	46.55	41.36			
Population below federal poverty line					
White, Non-Hispanic	46.20	47.03			
Black, Non-Hispanic	54.58	49.09			
Hispanic	51.90	56.19			
Asian or Pacific Islander, Non-Hispanic	45.65	56.80			
Native American, Non-Hispanic	45.43	53.21			

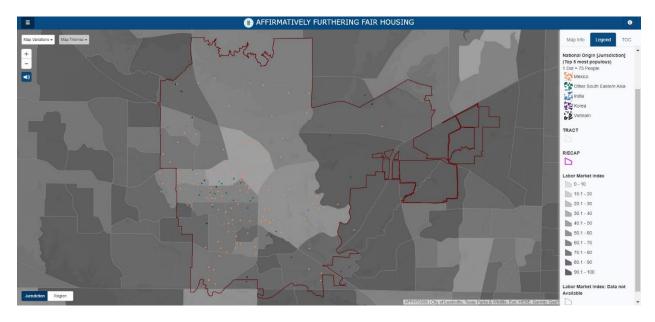
Graphic AFH55

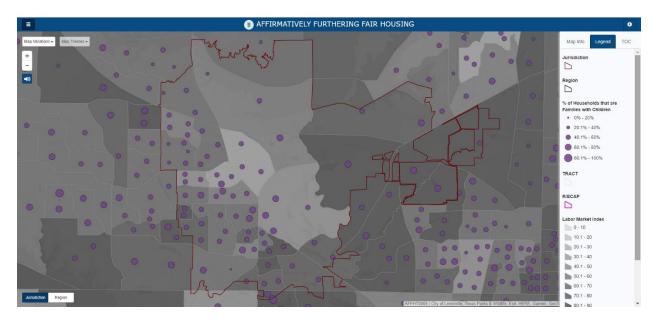


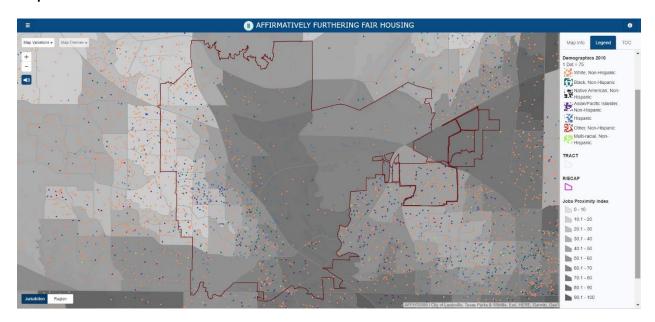
Graphic AFH56

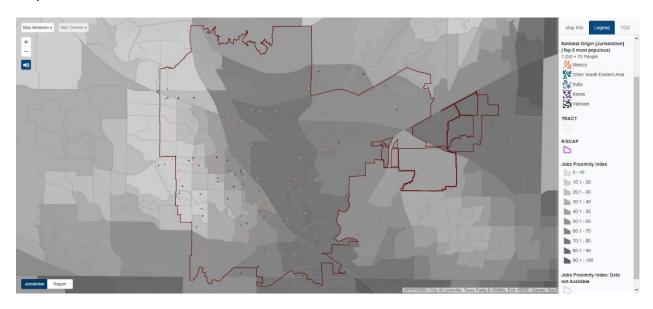


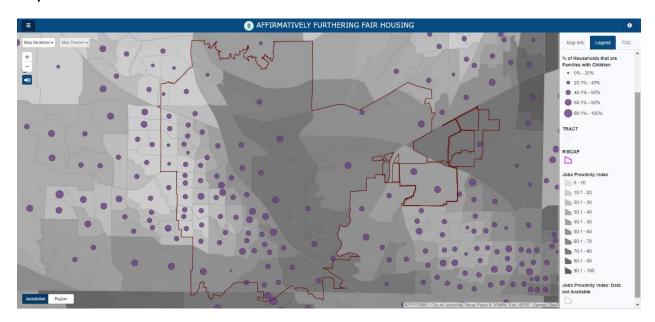












Transportation

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

Like many American cities and suburbs that were developed since the rise of the automobile, the neighborhoods in Lewisville are largely not walkable/pedestrian-friendly. The Center for Neighborhood Technology (Center) considers 0% of Lewisville neighborhoods as "location efficient." According to the Center, Lewisville neighborhoods have moderate access to jobs and are car-dependent with limited access to public transportation but have high density. The density is reflective of the fact that Lewisville is relatively small and almost fully developed, therefore most destinations could be considered close. Jobs and infrastructure supporting walkability would have to be improved in order for residents to fully enjoy the advantages of the city's density. Ownership of a vehicle costs Lewisville households an average of about \$12,000 annually, and they spend about 20% of their monthly income on transportation needs.

About 80% of Lewisville residents commute by driving alone, with another 10% carpooling with others. The City of Lewisville does offer public transportation options for residents. Lewisville recently transitioned from a six-route fixed bus system to an on-demand transit service called GoZone administered by the Denton County Transit Authority. The bus service was not utilized to the degree that officials considered justifiable or feasible. It has recently been reported (July 2022) that GoZone ridership is up, and the fare may soon increase from its current promotional rate of \$0.75 per ride. There are also two DCTA A-Line stops in the City.

HUD's Transit Trips Index - This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region. A higher index indicates residents in a neighborhood or area are more likely to use public transportation, and to some extent, reflects better access to public transit. White and Black persons in Lewisville are more likely to use or have better access to transit than the greater region. In Lewisville, there are also smaller gaps in the transit trip index between races. It must be noted that this data was based on the presence of Lewisville's fixed-route bus system, which is no longer in operation. It will serve as a great point of comparison in the future to evaluate the effect of the city's transition to GoZone.

HUD's Low-Cost Transportation Index - HUD's Low-Cost Transportation Index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region. A higher index indicates lower-transportation cost in a given neighborhood or study area, which may be a result of factors such as quality and dependable public transportation or greater density of homes, services, and jobs in the area. Low-cost transportation is higher in Lewisville than in the region. Since the analysis in other sections has not supported the assumption that Lewisville is a particularly dense suburb – at least in terms of homes and services – and the public transportation was discontinued due to low ridership, the higher low-transportation index in Lewisville can likely be attributed to close job proximity. First, Lewisville has numerous jobs located within the city. Second, Lewisville is traversed by several highways, which allows residents to more easily and quickly (and therefore cheaply) access highways for commutes to work.

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

The areas with the highest rates of transit ridership are in the center of the city and largely correspond with areas with lower incomes. This indicates that Lewisville transit riders are largely transit-dependent

riders, rather than transit-choice riders. This assumption may be hard to confirm considering the ondemand nature of the city's new transit model.

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

Land use patterns can affect the way persons travel by encouraging more modes of active transportation - when City blocks are easily connected, feature a variety of mixed-uses, and offer quality pedestrian, cycling, and public transit infrastructure. Neighborhoods with winding layouts, long blocks of only single-family homes, a prevalence of cul-de-sacs, and greater distances from public transportation stops deter active transportation options and limit residents to private vehicle use. As mentioned before, the neighborhoods of Lewisville seem to offer optimal density for walkability and transit project feasibility, but these have not manifested on the ground.

Nearly every stakeholder who was consulted about transportation access in Lewisville voiced an opinion that the current design of the on-demand, GoZone program. Stakeholders noted the following issues that cause a negative impact of families, low-income persons, persons with Limited English Proficiency and homeless individuals:

- Families with Children GoZone does not offer an option to order a vehicle equipped with a car seat. Therefore, if a parent wants to ensure that their child is safely restrained during the GoZone ride, they must bring their own car seat and then carry it with them on all of their errands.
- Persons with Limited English Proficiency While printed informational materials have been translated into Spanish, the app's interface is in English, with no apparent option for Spanish or Chin. Likewise, stakeholders indicated that there are not customer service agents who speak languages other than English.
- Persons who work outside of Lewisville and who work late-night shifts— During the weekdays, GoZone users may only travel within one of the designated GoZone zones. Therefore, a rider would not be able to travel directly from Lewisville to Denton on the GoZone because the cities are located within different zones. Additionally, LMI individuals who work in the hospitality, retail, and food service sectors often work shifts that end after 10 p.m., which is when GoZone stops serving riders on the weekdays.
- Persons living in apartment communities Stakeholders living in apartment communities
 reported that their GoZone drivers repeatedly canceled their ride due to an inability to "locate
 the rider." This problem is likely a result of apartment addressing systems and a lack of training
 and communication regarding where drivers and riders should, such as at the leasing office or
 community center.
- Homeless individuals Service providers who work with persons experiencing homelessness
 expressed concern that drivers may choose not to pick up homeless individuals, due to preconceived notions about poor hygiene or mental health issues. Additionally, many services for
 homeless individuals are located in the City of Denton, but homeless individuals cannot directly
 travel from Lewisville to Denton via the GoZone service.
- **Persons with disabilities** -- While the GoZone service allows users to request a wheelchair-accessible vehicle, there is no information related to accessibility accommodations/modification for persons with other disabilities, such as cognitive or visual disabilities. The DCTA provides a separate Access on Demand service for persons with physical, visual and cognitive disabilities however individuals must apply and be certified as eligible before they may use this service.

The following tables and maps are used to supplement the analysis of the City's and region's transportation system:

- **Graphic AFH63:** Transportation costs as a percentage of income (Center of Neighborhood Technology)
- Table AFH64: Transit trip index (HUD AFFHT0006)
- Table AFH65: Low-cost transportation index (HUD AFFHT0006)
- **Graphic AFH66:** Transit ridership as a percentage of workers (Center of Neighborhood Technology)
- Graphic AFH67: Annual transit trips (Center of Neighborhood Technology)

Graphic AFH63

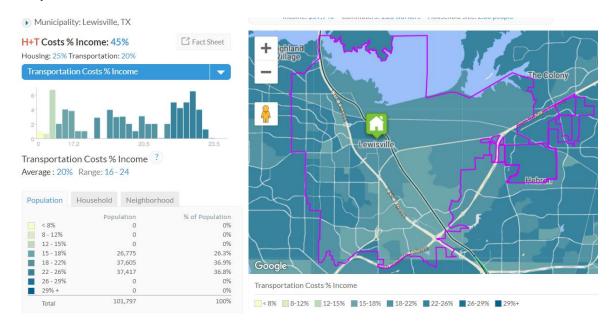


Table AFH64

Transit Trips Index				
	Lewisville	Dallas-Fort Worth- Arlington		
Total Population				
White, Non-Hispanic	64.74	58.29		
Black, Non-Hispanic	69.01	64.92		
Hispanic	66.99	67.34		
Asian or Pacific Islander, Non-Hispanic	66.98	68.38		
Native American, Non-Hispanic	65.49	58.98		
Population below federal poverty line				
White, Non-Hispanic	69.91	60.18		
Black, Non-Hispanic	69.90	69.55		
Hispanic	68.67	71.11		
Asian or Pacific Islander, Non-Hispanic	70.07	71.75		
Native American, Non-Hispanic	55.07	64.35		

Table AFH65

Low-Cost Transportation Index				
	Lewisville	Dallas-Fort Worth- Arlington		
Total Population				
White, Non-Hispanic	70.84	58.48		
Black, Non-Hispanic	75.20	65.10		
Hispanic	73.58	66.42		
Asian or Pacific Islander, Non-Hispanic	71.43	64.52		
Native American, Non-Hispanic	73.06	59.69		
Population below federal poverty line				
White, Non-Hispanic	75.91	63.13		
Black, Non-Hispanic	77.33	69.67		
Hispanic	75.86	70.18		
Asian or Pacific Islander, Non-Hispanic	75.24	70.78		
Native American, Non-Hispanic	73.29	66.56		

Graphic AFH66





Graphic AFH67





Access to Low Poverty Neighborhoods

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

The Low Poverty Index measures the amount of poverty that exists within a given neighborhood. It uses both family poverty rates and the percentage of households receiving public assistance to determine a score. A higher score on HUD's low-poverty index reflects less exposure to poverty in a given area or neighborhood.

A look at the most recent ACS data reveals a poverty rate of 7.3% for Lewisville, while the poverty rates for Black and Hispanic residents is greater. In terms of the total population, every racial/ethnic group in Lewisville has lower exposure to poverty than the Dallas MSA. This is most pronounced for Black and Hispanic residents, who see a boost of 23 and 14 points respectively. There is also less variation between the scores of different groups in Lewisville than the MSA. This supports a conclusion that there is greater access to opportunity, particularly for people of color, in Lewisville than the MSA. The same trends are consistent for the population below the poverty line.

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

Areas of poverty are in the center of Lewisville along either side of I-35. Accessing low-poverty neighborhoods is difficult for low-income residents and increasingly difficult for moderate-income residents as housing prices and rents increased significantly over the course of the last few years. There are no apparent disparities in terms of race or ethnicity in accessing low-poverty neighborhoods. Residents of Mexican origin are, however, more represented in the tracts of high poverty than residents of other nations of origin. Families are fairly evenly dispersed across Lewisville; they are well-represented in tracts of high poverty as well as tracts of low poverty.

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

Community members have relayed the reluctance and refusal of property owners in the area to accept housing choice vouchers. This can significantly affect voucher-holding families' ability to access low-poverty neighborhoods.

The following tables and maps are used to supplement the analysis of access to low poverty neighborhoods:

- **Table AFH68:** Poverty rate by race and ethnicity (ACS 2016-2020)
- Table AFH69: Low poverty index (HUD AFFHT0006)

Table AFH68

	POVERTY STATUS			
	Total	Below poverty level	Percent below poverty level	
RACE AND HISPANIC OR LATINO ORIGIN				
White alone	67,610	6,971	10.3%	
Black or African American alone	13,876	1,883	13.6%	
American Indian and Alaska				
Native alone	747	17	2.3%	
Asian alone	11,436	780	6.8%	
Native Hawaiian and Other Pacific Islander alone	135	0	0.0%	
Some other race alone	4,986	494	9.9%	
Two or more races	8,264	511	6.2%	
Hispanic or Latino origin (of any race)	34,388	4,572	13.3%	
White alone, not Hispanic or Latino	43,919	3,431	7.8%	

Table AFH69

Low Poverty Index				
	Lewisville	Dallas-Fort Worth- Arlington		
Total Population				
White, Non-Hispanic	66.34	65.65		
Black, Non-Hispanic	63.95	40.76		
Hispanic	52.10	38.02		
Asian or Pacific Islander, Non-Hispanic	70.15	67.50		
Native American, Non-Hispanic	61.28	57.08		
Population below federal poverty line				
White, Non-Hispanic	60.97	50.39		
Black, Non-Hispanic	46.80	24.80		
Hispanic	44.29	27.99		
Asian or Pacific Islander, Non-Hispanic	65.92	53.12		
Native American, Non-Hispanic	65.19	35.97		

Access to Environmentally Healthy Neighborhoods

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

Neighborhoods that are near industrial or commercial zones tend to be less environmentally healthy and score lower in the Environmental Health Index. The Environmental Health Index measures exposure based on Environmental Protection Agency estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood. The HUD AFFH Mapping tool shows fairly similar levels of environmental health across the city of Lewisville. Southern Lewisville scores slightly lower than the northern part of the city, but residents are not clustered or settled in any manner that suggests disparities in access to environmentally healthy neighborhoods. There are nine brownfield sites in the city of Lewisville. They are located along highways, which is where multifamily and low-income developments tend to be located.

HUD's Environmental Health Index categorizes potential exposure to harmful toxins at a neighborhood level. A higher index reflects less exposure to harmful toxins, and therefore a more environmentally healthy neighborhood. Two general trends can be gleaned from the index: 1) Lewisville neighborhoods of all makeups are less environmentally healthy than those of the larger MSA, and 2) there are no significant disparities present that are readily apparent in terms race or income within Lewisville.

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

The City of Lewisville's Sustainability Plan highlights the following areas: energy, water, waste and resource management, equity and inclusiveness, health and wellness, transportation, green space, and community outreach and education. Topics of exploration includes new green buildings and energy upgrades to existing buildings, possibilities for multi-modal transportation options, green space prioritized for pollinating species, and ways to support residents' composting and installation of solar panels. In 2021, the city received the NCTCOG's Clean Fleet Award. The city has also positioned Lewisville Lake Environmental Learning Area (LLELA) as a vehicle by which to accomplish education, equity, and sustainability goals.

It is important to consider the effects of climate change upon vulnerable populations and their housing when planning mitigation and adaptation strategies. Renter households are potentially more vulnerable to the effects of climate change if their local jurisdiction primarily provides options and resources for homeowners to protect and retrofit their property.

Food Deserts

Access to fresh, healthy foods is another area addressed by the city's Sustainability Action Plan. Food access greatly impacts the quality of life of families and is directly affected by residential patterns, and the city's goal is to increase the accessibility to goods and services available at the neighborhood level. A food desert is considered an area where a significant number of low-income residents are more than 1 mile from a grocery store, farmer's market, or other healthy food outlet. The map below shows levels of poverty within the city as well as the sites where residents can access food. There is a clear and noticeable lack of nearby food options for residents on the far east side of the city – an area which also has high levels

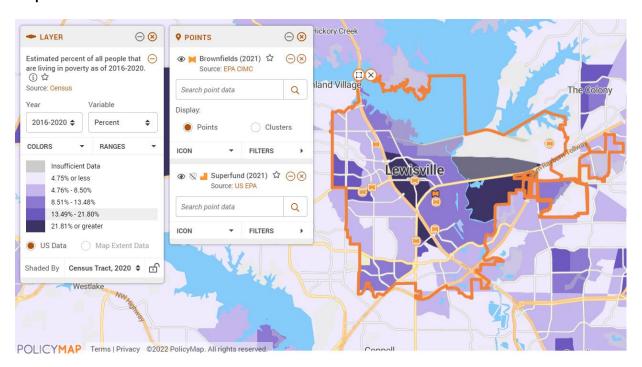
of poverty. All food locations are also located along highways and major arterials. This is good for ease of navigation but can be difficult to reach for residents who cannot or do not drive. Increasing food access within neighborhoods, rather than at their peripherals, would truly increase access to fresh food and particularly help low-income families.

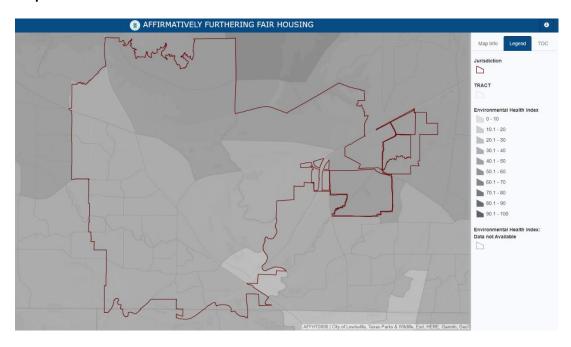
The following tables and maps are used to supplement the analysis of access to environmentally healthy neighborhoods:

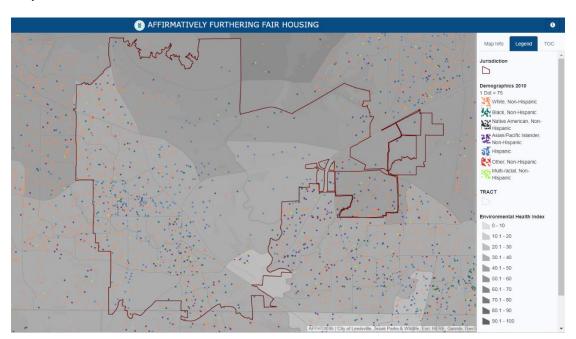
- **Table AFH70:** Environmental health index (HUD AFFHT0006)
- Map AFH71: Poverty and location of brownfields and superfund sites (2016-2020 ACS, EPA)
- Map AFH72: Environmental health index (HUD AFFHT0006)
- Map AFH73: Environmental health index by race and ethnicity (HUD AFFHT0006)
- Map AFH74: Environmental health index by national origin (HUD AFFHT0006)
- Map AFH75: Environmental health index by family status (HUD AFFHT0006)

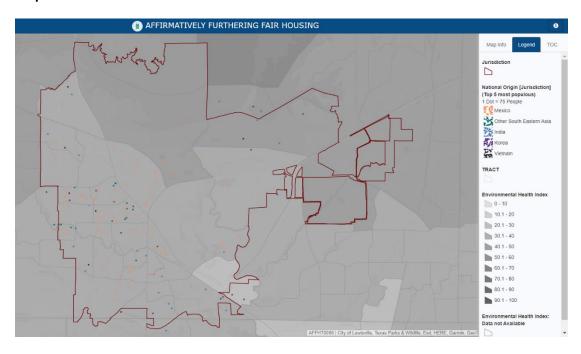
Table AFH70

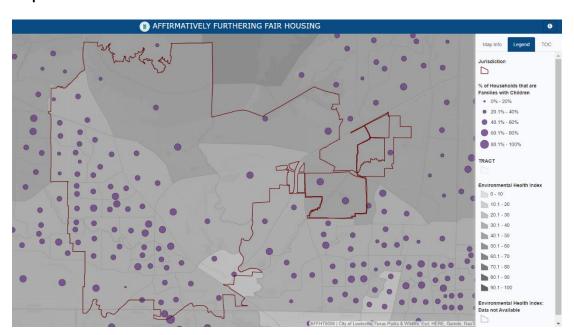
Environmental Health Index			
	Lewisville	Dallas-Fort Worth- Arlington	
Total Population			
White, Non-Hispanic	37.47	45.19	
Black, Non-Hispanic	36.35	42.50	
Hispanic	37.42	41.34	
Asian or Pacific Islander, Non-Hispanic	37.48	41.19	
Native American, Non-Hispanic	37.28	45.07	
Population below federal poverty line			
White, Non-Hispanic	36.12	45.24	
Black, Non-Hispanic	35.90	40.78	
Hispanic	37.70	40.05	
Asian or Pacific Islander, Non-Hispanic	36.85	39.34	
Native American, Non-Hispanic	38.83	41.47	











Patterns in Disparities in Access to Opportunity

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

Homeownership and small business ownership are two of the traditional pathways that allow a household to build and maintain generational wealth. However, both public and private discrimination have prevented non-White households and Hispanic households from accessing these opportunities to the same degree as White, non-Hispanic households. Both types of discrimination – public and private – have taken numerous forms over the years but, in general, focus on two subject areas: discrimination that focuses on place or geography (i.e. where a person can live or maintain a business) and financial discrimination (i.e. whether a person can access the funding necessary to purchase a home or start/grow a small business).

Geographic Discrimination - Historical discrimination related to housing came in many forms, one of the most common being private deed restrictions that explicitly prevented homeowners from re-selling or renting their homes to people of certain races or religions (most often persons who were non-White, Hispanic or Jewish). While the U.S. Supreme Court prohibited public enforcement of such deed restrictions in 1948, other forms of discrimination continued unabated and persist today. For example, governmental action helps deepen racial, ethnic, and religious segregation by failing to invest public dollars in segregated neighborhoods such that non-White or Hispanic neighborhoods lack adequate infrastructure, wellmaintained parks and recreation centers, and are underserved by city services. Furthermore, governmental decisions related to land use and transportation planning have led to non-White or Hispanic neighborhoods being overwhelmed with toxic, polluting industries; bisected by high-speed, elevated highways; and overconcentrated with subsidized housing units. Private discrimination continues in the form of real estate professionals who steer clients into or away from neighborhoods based on assumptions about race, ethnicity, and religious affiliation, which prevents homebuyers and renters from living in integrated neighborhoods. Similarly, when banks decline to open branch offices in non-White or Hispanic neighborhoods, alternative lenders such as payday lenders, auto title lenders, and pawn shops move in to fill the void, often offering predatory lending terms. Neighborhood residents also overtly or unintentionally help maintain racially- and ethnically-segregated neighborhoods through opposing subsidized housing projects, zoning changes that allow for non-single-family zoning, and acceptance of housing vouchers.

Lending and Insurance Discrimination — Historical discrimination related to lending and insurance came in the form of regulations and guidance that explicitly deemed non-White or Hispanic neighborhoods, too "risky" for government-backed mortgages or insurance. In some instances, these regulations prevented non-White and Hispanic borrowers from being able to obtain a traditional loan to purchase a single-family home; these borrowers often had to resort to predatory purchase alternatives such as contracts for deed. Today, discrimination against non-White and Hispanic homebuyers and small business owners can continue to occur — in some instances, they are denied loans or steered towards more expensive or riskier loan products, despite having similar credit history, income, and savings as White, non-Hispanic borrowers.

Summary of Data Insights

Homeownership - Table AFH39 was created to analyze whether members of racial or ethnic groups are able to access homeownership opportunities in relative proportion to their population in Lewisville. Thirty-six-point four percent (36.4%) of Lewisville residents identify themselves as White, 15.8% of residents identify themselves as Black or African American alone, and 11.3% of residents identify themselves as Asian. Slightly over 32% of Lewisville residents identify their ethnicity as Hispanic or Latino (of any race). About 14% of residents identify as Some Other Race.

However, the **Table AFH39** shows the White homeowner households are overrepresented as a total share of homeowner households while Black homeowners are underrepresented. Furthermore, there are census tracts that have a high share of Black, Asian, and Hispanic homeowner households, which may indicate that these protected classes are being steered towards or away from certain neighborhoods.

Maps AFH76-91 explore the correlation between homeownership and segregation through the lens of mortgage lending. These maps examine mortgage lending that occurred in 2020, when mortgage rates were historically low and the COVID-19 pandemic-related lockdowns caused many households to consider purchasing a new home. For each major racial or ethnic group, there is a series of four maps which examine: (1) the areas of the city where the percentage of residents of the race or ethnicity is at least 10 percentage points higher than the percentage of their total population citywide, (2) the percent of home loans made in 2020 to borrowers of the race or ethnicity, (3) a zoomed-out map that shows, from a regional perspective, the percent of home loans made in 2020 to borrowers of the race or ethnicity, and (4) the percent of home loan applications from borrowers of the race or ethnicity that were denied in 2020.

Black homeowners and homebuyers - While Black persons constitute nearly 16% of the city's population, Black households compose only 6% of homeowner households. In 2020, there were very few census tracts in the City where Black home loan borrowers were over-represented compared to their total population. Furthermore, the loan denial data shows that, while Black borrowers were attempting to purchase homes in the western census tracts in the City which are higher-income and have a higher percentage of White, non-Hispanic population, Black borrowers experienced loan denial rates above 20%. Further examination is needed to explore how the City and its other public and private partners can help increase the number of Black homebuyers who are able to purchase homes in Lewisville, especially in the western areas of the City.

White Non-Hispanic homeowners and homebuyers – In comparison, while White non-Hispanic persons constitute approximately 42% of the City's population, White non-Hispanic households compose nearly 64% of homeowner households. In 2020, White non-Hispanic home loan borrowers made up 60% or more of the borrowers in many western census tracts. Furthermore, citywide, White non-Hispanic borrowers were far less likely than Black borrowers to experience loan denials.

Asian homeowners and homebuyers — Asian persons constitute slightly more than 11% of the city's population and roughly 10% of homeowner households. In 2020, Asian homebuyers primarily obtained home loans in the two areas of the City where they are over-represented compared to their total population — the south-central and northeastern areas of the City. However, the loan denial data shows that, while Asian borrowers also attempted to purchase homes in the central areas of the City (due West of I-35), they experienced loan denial rates above 20%. Since the City has a significant population of ethnic Chin/Burmese refugees who may face language and educational barriers when attempting to purchase

housing, further examination of homebuyer data is necessary to distinguish between Chin residents and residents of other Asian heritage.

Hispanic homeowners and homebuyers – Hispanic persons constitute slightly more than 32% of the city's population, and roughly 20% of homeowner households. While Hispanic households tend to be concentrated in the central area of the City, in 2020, Hispanic homebuyers obtained over 10% of the home loans in many western, higher-income census tracts. However, the loan denial data shows that high percentages of Hispanic borrowers also were denied home loans in western and far north-central census tracts. Further examination is needed to explore how the City and its other public and private partners can support Hispanic households' recent success in purchasing homes throughout Lewisville, especially in the western areas of the City.

Access to Financial Services – Maps AFH92-93 examine access to financial services in two separate ways. Map AFH92 examines the location of all SBA small business loans (504 and 7(a)) made to Lewisville businesses from 2010-2021. The map indicated that businesses that received loans are clustered around Lewisville's major commercial corridors and in its industrial areas, as would be expected for business loans. There do not appear to be any major commercial corridors where there is a glaring absence of loans. This indicates that Lewisville-based small business appear to be able to access SBA-backed loans regardless of whether they are located in an area that has higher levels of economic, racial, or economic segregation.

Map AFH93 examines the location of traditional lenders - bank branches and credit unions — alongside alternative lenders — payday lenders, auto title lenders, and pawn shops. When this map is viewed alongside AFH7 and AFH24, which examine the predominate race/ethnicity and median income in each census tract, respectively, it become evident that alternative lenders are clustered along South Business Highway 121 near the Triangle neighborhood, which includes census tracts with the lowest incomes in the City. The population in this neighborhood has high public transit dependency, which means that traveling to one of the traditional lender locations to the north or south of the neighborhood would be far less convenient than walking to one of the alternative lenders. Therefore, in the future, it is important to explore ways to improve access to traditional financial services for residents living in and near the Triangle neighborhood, as well as in other neighborhoods that lack easy access to traditional lenders so that these residents are able to establish personal and small business banking relationships.

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

There is high access across all groups in Lewisville to high-quality education, environmentally healthy neighborhoods, and low-cost transportation. There is a generally high labor force engagement, but elevated unemployment rates for Black residents and disabled persons might indicate disparities in access to employment for these groups.

Contributing Factors of Disparities in Access to Opportunity

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

Availability of public transportation

Citizen uptake of GoZone as a transportation service may take some time and require more outreach and feedback incorporation by DCTA. Though access to low-cost transportation may not be an issue in Lewisville, programs should operate with the goal of not placing further burden on households that depend on public transportation.

Lack of access to opportunity due to high housing costs

High housing costs throughout most of the City are a barrier to low-income households seeking homes in areas where there are high opportunities. This creates a barrier for them to move away from high-poverty areas of the City, such as the tracts in the center of the City along I-35 or to the far east. Households that reside in high-poverty areas of the city – such as the Triangle – are disconnected from services they need, such as food, medical services, transportation, and community services. This is particularly true of populations such as the Chin population in Lewisville, which is also subject to language barriers.

Source of income discrimination

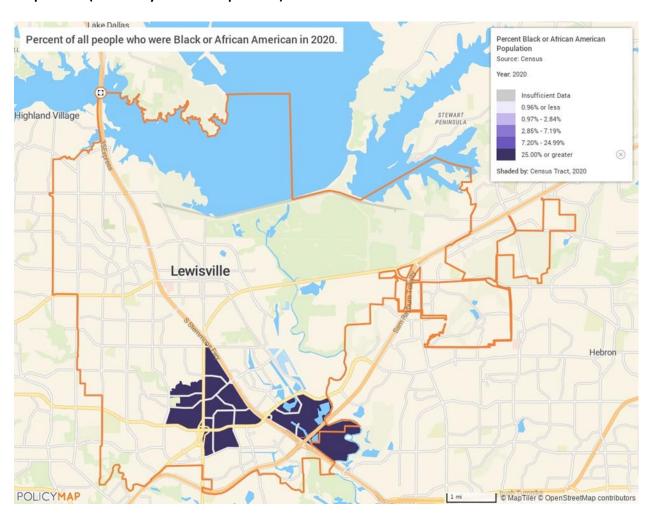
Housing Choice Voucher holders can face source of income discrimination by landlords who refuse to accept payment through this program or any other form of public subsidy. Landlords either have misconceptions about voucher holders or claim that the cost of unit upkeep that meets the voucher program standards is too high and prohibits their program participation. Currently, Texas law allows landlords to deny housing to voucher-holding households (except military veterans) solely on the basis of them participating in this public program. Unfortunately, having a voucher in hand does not guarantee a household their full choice and access to areas of opportunity when landlords are able to discriminate based on their source of income. These practices and attitudes limit opportunity and further contribute to the segregation of racial and ethnic minority households.

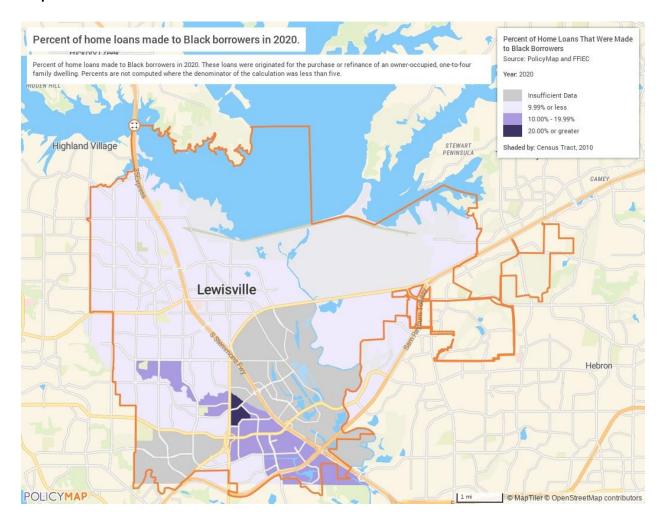
The following tables and maps are used to supplement the analysis of patterns in disparity in access to opportunity:

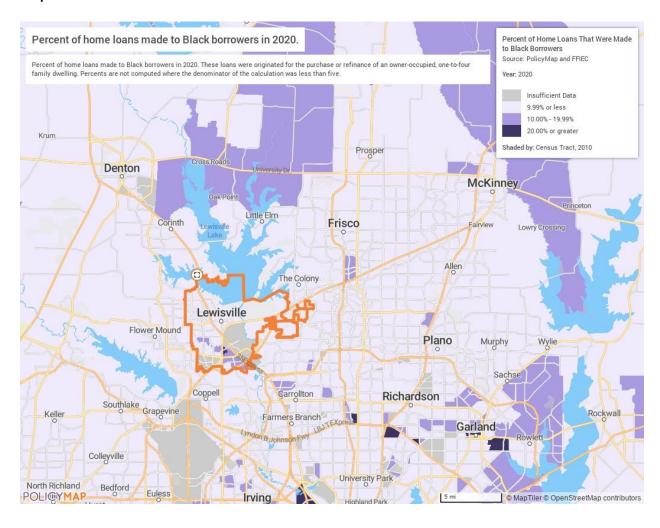
- Map AFH76: Percent of all people who are Black or African American (2020 Census)
- Map AFH77: Percent of all home loans made to Black borrowers (PolicyMap and FFIEC 2020, City)
- Map AFH78: Percent of all home loans made to Black borrowers (PolicyMap and FFIEC 2020, Region)
- Map AFH79: Percent of home loan applications from Black applicants that were denied (PolicyMap and FFIEC 2020)
- Map AFH80: Percent of all people who are Non-Hispanic White (2020 Census)
- Map AFH81: Percent of all home loans made to Non-Hispanic White borrowers (PolicyMap and FFIEC 2020, City)
- Map AFH82: Percent of all home loans made to Non-Hispanic White borrowers (PolicyMap and FFIEC 2020, Region)
- Map AFH83: Percent of home loan applications from Non-Hispanic White applicants that were denied (PolicyMap and FFIEC 2020)
- Map AFH84: Percent of all people who are Asian (2020 Census)
- Map AFH85: Percent of all home loans made to Asian borrowers (PolicyMap and FFIEC 2020, City)
- Map AFH86: Percent of all home loans made to Asian borrowers (PolicyMap and FFIEC 2020, Region)
- Map AFH87: Percent of home loan applications from Asian applicants that were denied (PolicyMap and FFIEC 2020)
- Map AFH88: Percent of all people who are Hispanic or Latino (2020 Census)

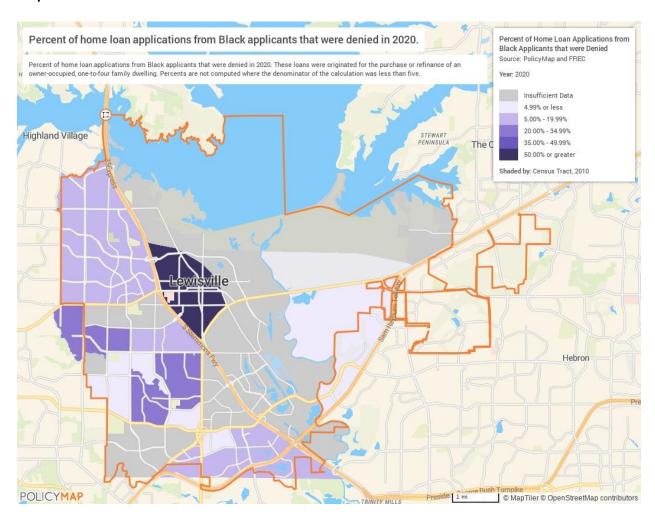
- Map AFH89: Percent of all home loans made to Hispanic borrowers (PolicyMap and FFIEC 2020, City)
- Map AFH90: Percent of all home loans made to Hispanic borrowers (PolicyMap and FFIEC 2020, Region)
- Map AFH91: Percent of home loan applications from Hispanic applicants that were denied (PolicyMap and FFIEC 2020)
- Map AFH92: Location of businesses that received SBA 7(a) or 504 loans (SBA 2010-2021)
- Map AFH93: Location of traditional and alternative lenders (FFIC, NCUA, Texas OCCC 2022)
- Table AFH94: Texas licensed alternative lenders (Texas OCCC 2022)

Map AFH76 (Previously used as Map AFH12)

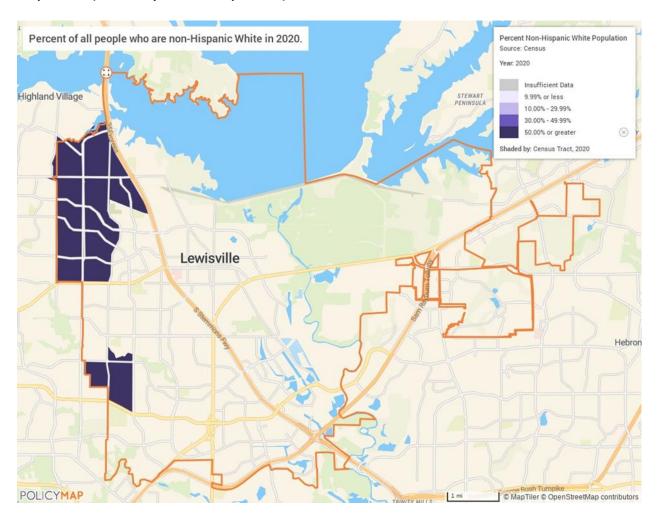


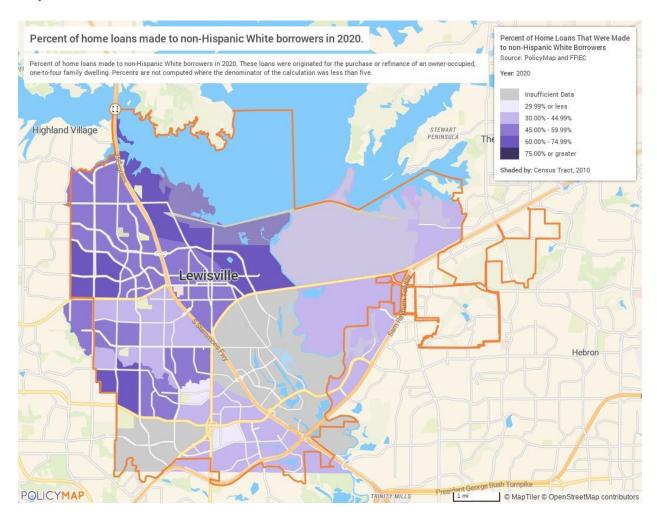


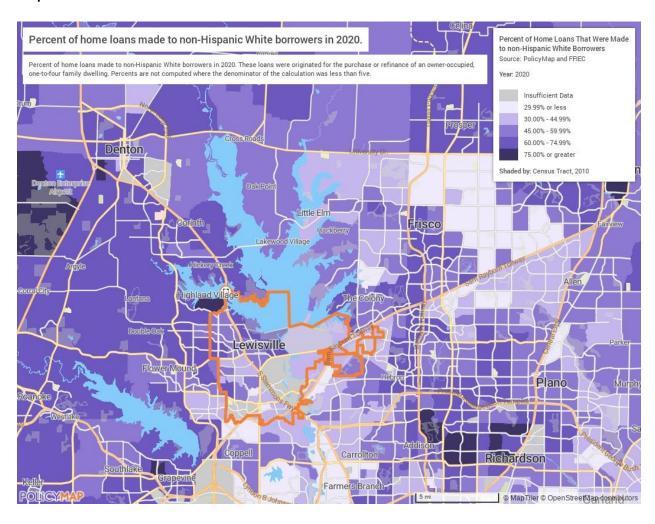


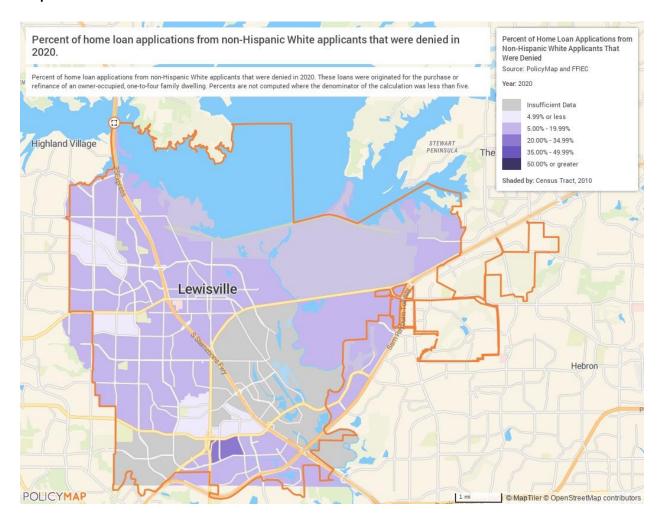


Map AFH80 (Previously used as Map AFH16)

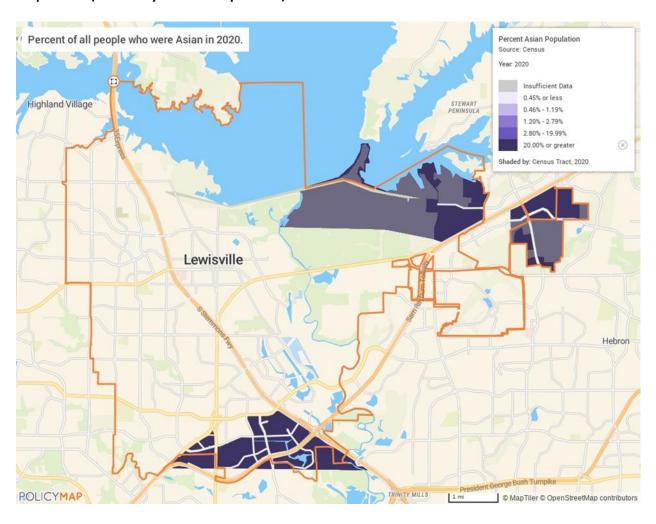


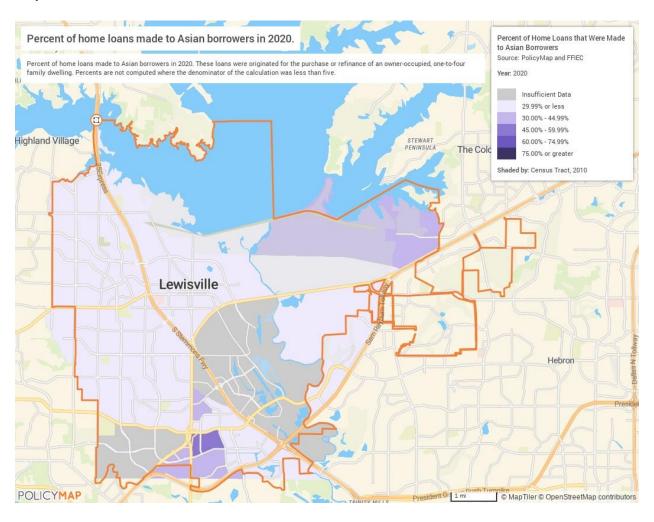


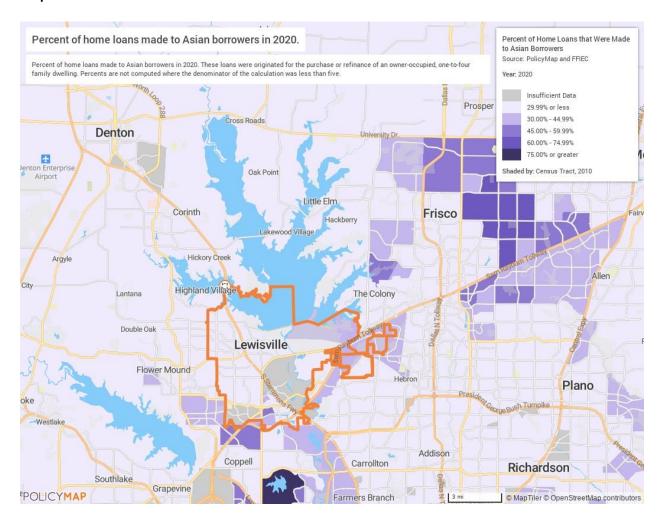


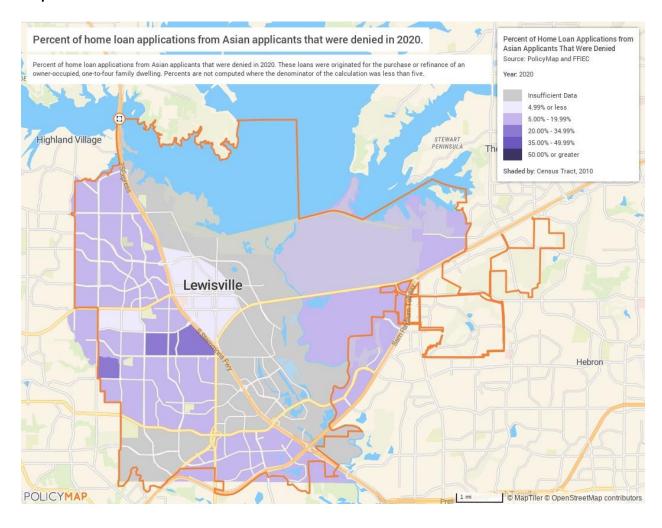


Map AFH84 (Previously used as Map AFH14)

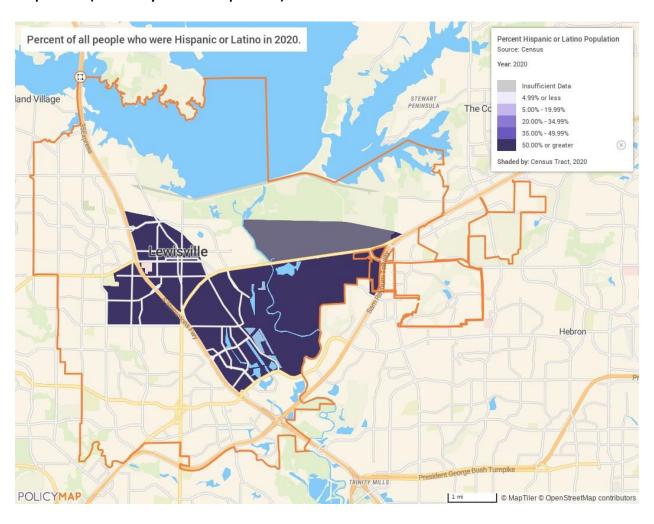


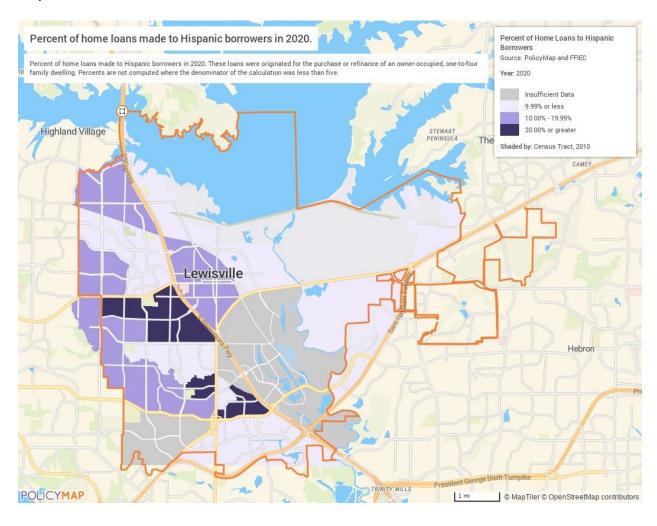


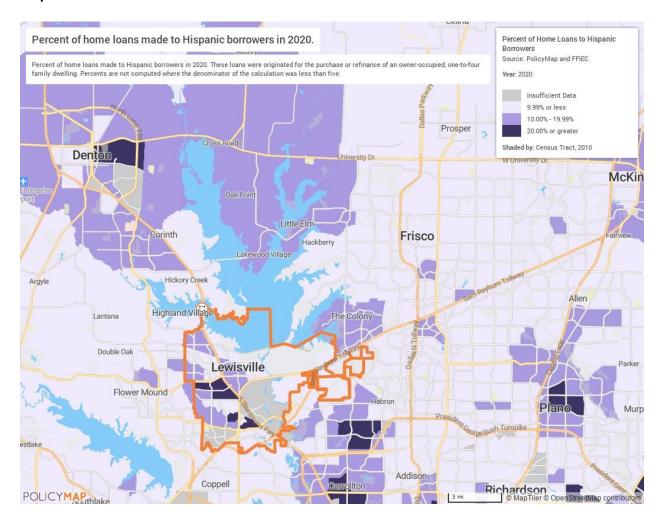


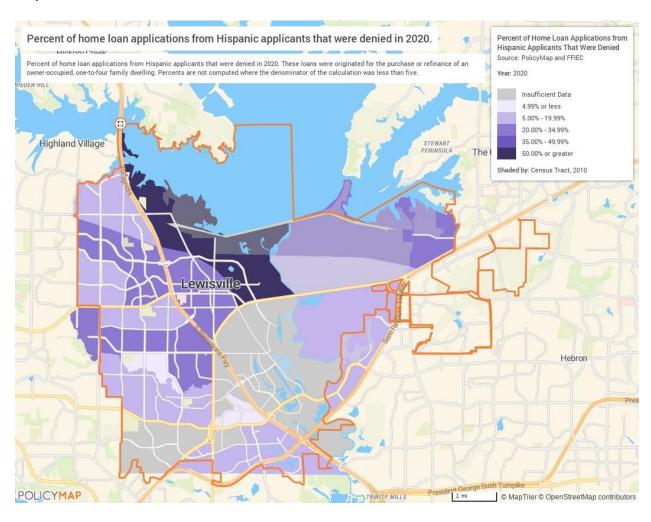


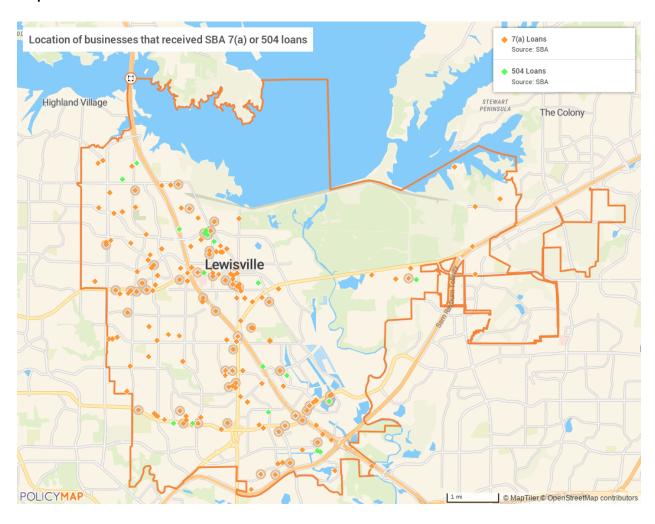
Map AFH88 (Previously used as Map AFH18)











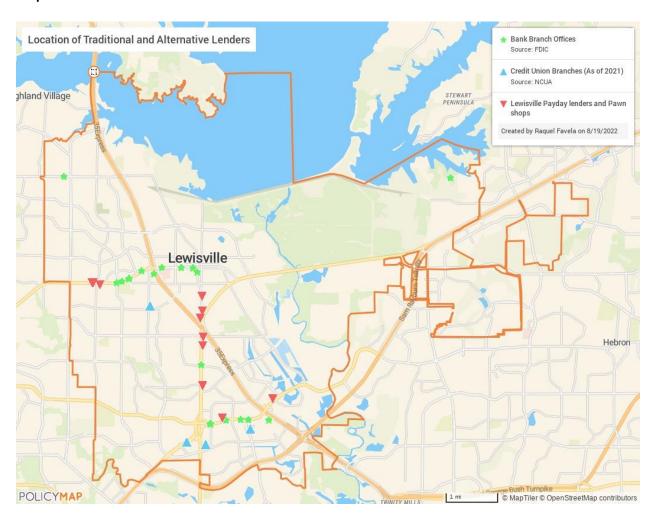


Table AFH94

License Number	Business Type	Business Name	Status	Address	Zip Code
59418	Credit Access Business	THE CASH STORE	Active	721 HEBRON PKWY	75057
60605	Credit Access Business	CHECK N GO	Active	291 E ROUNDGROVE RD	75067
61539	Credit Access Business	ACE CASH EXPRESS #1319	Active	1324 W MAIN ST	75067
61543	Credit Access Business	ACE CASH EXPRESS #1357	Active	1302 S State Hwy 121	75067
61975	Credit Access Business	LOANSTAR TITLE LOANS	Active	1183 SOUTH MILL ST	75057
62318	Credit Access Business	CASHMAX	Active	1288 W MAIN ST	75067
7342	Pawn Shop	INSTA-CASH PAWN	Active	2302 S HWY 121	75067
4063	Pawn Shop	LEWISVILLE PAWN SHOP	Active	962 S MILL ST	75067
6029	Pawn Shop	CASH AMERICA PAWN OF DFW #11	Active	1432 S BUSINESS HWY 121	75067
6503	Pawn Shop	LEGACY PAWN SHOP	Active	774 S MILL ST	75067
168192	Pawn Shop	EZPAWN	Active	1352-1354 W MAIN ST	75067

Disproportionate Housing Needs

Disproportionately Greater Need: Housing Problems Introduction

This section compares the existence of housing problems* amongst racial and ethnic groups against that of the jurisdiction as a whole in an effort to see if any group(s) shares a disproportionate burden of the area's housing problems. For this purpose, HUD guidelines deem a disproportionately greater need to exist when households of a particular racial or ethnic group experience housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

The following series of tables looks at the existence of housing problems amongst different racial and ethnic groups across the 0%-30%, 30%-50%, 50%-80%, and 80%-100% AMI cohorts.

- *The four housing problems are:
- 1. Lacks complete kitchen facilities
- 2. Lacks complete plumbing facilities
- 3. Between 1.0 and 1.5 persons per room
- 4. Cost Burden over 30%

Discussion

By HUD's definition of disparity as 10% or higher, a few different racial and ethnic groups experience a disproportionately greater need when it comes to housing problems. Below are breakdowns of the proportion of the jurisdiction as a whole experiencing housing problems within each income cohort, and the racial/ethnic groups experiencing disproportionately greater need related to housing problems within each income cohort.

0-30% AMI:

- Within this income cohort, 87.7% of households experience one or more of the four housing problems.
- Asian households in this cohort experience disproportionately greater need, with 100% of Asian households (185 total) experiencing one or more of the four housing problems.

30-50% AMI:

- Within this income cohort, 87.5% of households experience one or more of the four housing problems.
- Black/African American households in this cohort experience disproportionately greater need, with 98.2% of Black/African American households (540 of 550 total) experiencing one or more of the four housing problems.
- American Indian/Alaska Native households in this cohort experience disproportionately greater need, with 100% of American Indian/Alaska Native households (20 total) experiencing one or more of the four housing problems.

50-80% AMI:

- Within this income cohort, 57.6% of households experience one or more of the four housing problems.
- Per HUD's definition, no racial or ethnic groups within this income cohort experience disproportionately greater need related to housing problems.

80-100% AMI:

- Within this income cohort, 20.3% of households experience one or more of the four housing problems.
- Per HUD's definition, no racial or ethnic groups within this income cohort experience disproportionately greater need related to housing problems.

Table AFH95

NA-15 Disproportionately Greater Need: Housing Problems									
Housing Problems	Has one or more of four housing problems	Percent of households experiencing issue	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total Households				
0%-30% of Area Median Income									
Jurisdiction as a whole	2,889	87.7%	180	225	3294				
White	1,129	86.2%	45	135	1309				
Black / African American	480	88.9%	15	45	540				
Asian	185	100.0%	0	0	185				
American Indian, Alaska Native	4	28.6%	10	0	14				
Pacific Islander	0	0.0%			0				
Hispanic	1,035	90.0%	70	45	1150				
	3	0%-50% of Area Med	lian Income	'					
Jurisdiction as a whole	4,195	87.5%	600	0	4795				
White	1,690	84.3%	315	0	2005				
Black / African American	540	98.2%	10	0	550				
Asian	285	90.5%	35	0	315				
American Indian, Alaska Native	20	100.0%	0	0	20				
Pacific Islander	0	0.0%	0	0	0				
Hispanic	1,550	88.1%	210 0		1760				
·									
	5	0%-80% of Area Med	lian Income						
Jurisdiction as a whole	4,410	57.6%	3,240	0	7650				
White	2,085	60.9%	1,340	0	3425				
Black / African American	820	63.6% 470		0	1290				
Asian	295	60.2% 195		0	490				
American Indian, Alaska Native	0	0.0% 4		0	4				
Pacific Islander	0	0.0%		0	0				
Hispanic	990	46.8%	46.8% 1,124		2114				
•									
	80	0%-100% of Area Me	dian Income						
Jurisdiction as a whole	1,055	20.3%	4,145	0	5200				
White	570	21.2%	2,115	0	2685				
Black / African American	155	18.5%	685	0	840				
Asian	85	26.6%	234	0	319				
American Indian, Alaska Native	0	0.0%	0	0	0				
Pacific Islander	0	0.0%	0	0	0				
Hispanic	215	16.9%	1.055	0	1270				

Disproportionately Greater Need: Severe Housing Problems Introduction

This section compares the existence of severe housing problems* amongst racial and ethnic groups against that of the jurisdiction as a whole in an effort to see if any groups share a disproportionate burden of the area's severe housing problems. For this purpose, HUD guidelines deem a disproportionately greater need to exist when households of a particular racial or ethnic group experience severe housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

The following series of tables looks at the existence of severe housing problems amongst different racial and ethnic groups across the 0%-30%, 30%-50%, 50%-80%, and 80%-100% AMI cohorts.

- *The four severe housing problems are:
- 1. Lacks complete kitchen facilities
- 2. Lacks complete plumbing facilities
- 3. More than 1.5 persons per room
- 4. Cost Burden over 50%

Discussion

By HUD's definition of disparity as 10% or higher, a few different racial and ethnic groups experience a disproportionately greater need when it comes to severe housing problems. Below are breakdowns of the proportion of the jurisdiction as a whole experiencing severe housing problems within each income cohort, and the racial/ethnic groups experiencing disproportionately greater need related to severe housing problems within each income cohort.

0-30% AMI:

- Within this income cohort, 79.8% of households experience one or more of the four severe housing problems.
- Asian households in this cohort experience disproportionately greater need, with 100% of Asian households (185 total) experiencing one or more of the four severe housing problems.

30-50% AMI:

- Within this income cohort, 47.1% of households experience one or more of the four severe housing problems.
- Black/African American households in this cohort experience disproportionately greater need, with 59.6% of Black/African American households (325 of 545 total) experiencing one or more of the four severe housing problems.

50-80% AMI:

• Within this income cohort, 14.1% of households experience one or more of the four severe housing problems.

• Per HUD's definition, no racial or ethnic groups within this income cohort experience disproportionately greater need related to severe housing problems.

80-100% AMI:

- Within this income cohort, 4.8% of households experience one or more of the four severe housing problems.
- Per HUD's definition, no racial or ethnic groups within this income cohort experience disproportionately greater need related to severe housing problems.

Table AFH96

NA-15 Disproportionately Greater Need: Severe Housing Problems									
Severe Housing Problems*	Has one or more of four housing problems	Percent of households experiencing issue	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Total Households				
0%-30% of Area Median Income									
Jurisdiction as a whole	2,634	79.8%	440	225	3299				
White	1,049	79.8%	130	135	1314				
Black / African American	435	80.6%	60	45	540				
Asian	185	100.0%	0	0	185				
American Indian, Alaska Native	4	28.6%	10	0	14				
Pacific Islander	0	0.0%	0	0	0				
Hispanic	905	78.7%	200	45	1150				
	3	0%-50% of Area Med	ian Income						
Jurisdiction as a whole	2,255	47.1%	2,530	0	4785				
White	935	46.6%	1,070	0	2005				
Black / African American	325	59.6%	220	0	545				
Asian	145	45.3%	175	0	320				
American Indian, Alaska Native	0	0.0%	20	0	20				
Pacific Islander	0	0.0%	0	0	0				
Hispanic	850	48.0%	920	0	1770				
	5	0%-80% of Area Med	ian Income						
Jurisdiction as a whole	1,075	14.1%	6,575	0	7650				
White	380	11.1%	3,045	0	3425				
Black / African American	115	8.9%	1,175	0	1290				
Asian	105	21.4% 385		0	490				
American Indian, Alaska Native	0	0.0%	0.0% 4		4				
Pacific Islander	0	0.0% 0		0	0				
Hispanic	455	21.5%	1,665	0	2120				
	80	%-100% of Area Med	lian Income						
Jurisdiction as a whole	250	4.8%	4,950	0	5200				
White	95	3.5%	2,595	0	2690				
Black / African American	10	1.2%	830	0	840				
Asian	24	7.5%	295	0	319				
American Indian, Alaska Native	0	0.0%	0	0	0				
Pacific Islander	0	0.0%	0	0	0				
Hispanic	120 9.4% 1,150 0		0	1270					

Disproportionately Greater Need: Housing Cost Burdens Introduction

This section compares the existence of housing cost burden and severe cost burden amongst racial and ethnic groups against that of the jurisdiction as a whole in an effort to see if any group(s) share a disproportionate burden of the area's cost burden. For this purpose, HUD guidelines deem a disproportionately greater need to exist when households of a particular racial or ethnic group experience housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

A household is considered to be cost burdened if they spend between 30% and 50% of monthly income on housing costs, and severely cost burdened if they spend more than 50% of monthly income on housing costs.

Discussion:

By HUD's definition of a disparity of 10% or higher, no groups experience a disproportionate need when it comes to cost burden (paying greater than 30% of their income on housing costs).

Table AFH97

Housing Cost Burden								
Housing Cost Burden	<=30%	Percent of households experiencing issue	30-50%	Percent of households experiencing issue	>50%	Percent of households experiencing issue	No / negative income (not computed)	Total
Jurisdiction as a whole	26,155	67.5%	7,565	19.5%	4,765	12.3%	245	38,730
White	14,550	70.8%	3,510	17.1%	2,359	11.5%	135	20,554
Black / African American	3,259	60.1%	1,275	23.9%	765	14.3%	45	5,344
Asian	2,054	70.6%	585	20.1%	270	9.3%	0	2,909
American Indian, Alaska Native	85	80.0%	20	18.3%	4	3.7%	0	109
Pacific Islander	29	100.0%	0	0.0%	0	0.0%	0	29
Hispanic	5,590	63.8%	1,815	20.7%	1,295	14.8%	60	8,760

Disproportionately Greater Need: Discussion

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Asian households in the 0-30% AMI cohort experience disproportionately greater need when it comes to both housing problems and severe housing problems.

Black/African American households in the 30-50% AMI cohort experience disproportionately greater need when it comes to both housing problems and severe housing problems.

American Indian/Alaska Native households in the 30-50% AMI cohort experience disproportionately greater need when it comes to housing problems.

If they have needs not identified above, what are those needs?

No additional needs identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community? In earlier sections of this AFH, we analyzed the predominant racial or ethnic group in Lewisville the larger geography of census tracts along with the smaller geography of census blocks. In maps AFH97-102 below, we combined several data tables to gauge whether there are specific census tracts in the city where households are likely to be experiencing disproportionately greater housing needs and, as such, could benefit from home repair programs. In order to examine the disproportionately greater needs of homeowners, we layered 3 set of ACS data at the census tract level using the follow criteria: (1) 25% or more of owner-occupied housing units reported experiencing 1 or more physical or financial conditions, (2) at least 100 homeowner households of the selected racial or ethnic group, and (3) the selected racial or ethnic group had a median income of \$48,700 or less (which is 50% of AMI for a 4-person household.) For renter households, we used the same criteria except the modified the percentage of renter-occupied housing units reported experiencing 1 or more physical or financial conditions from 25% to 50%.

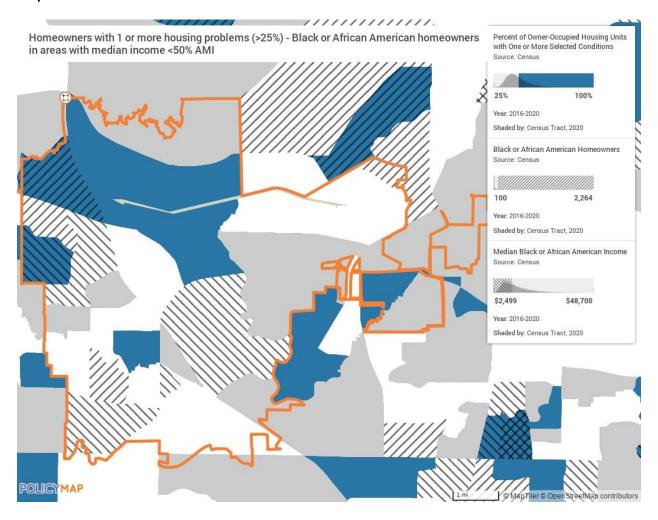
This examination revealed the following:

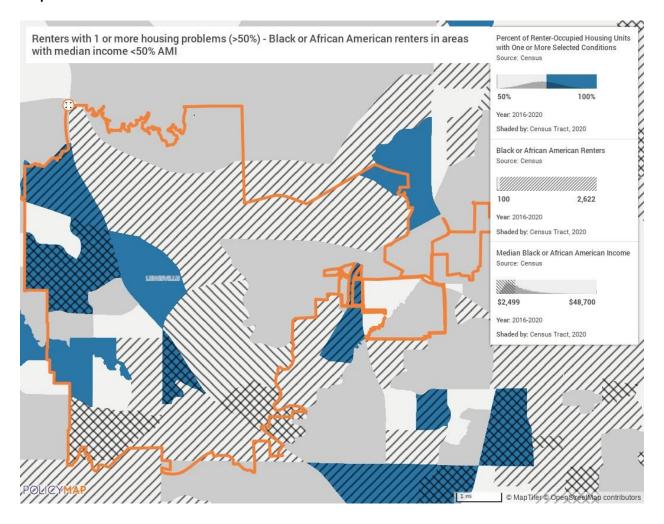
- Black or African American Homeowners There were no census tracts that met all criteria for Black or African American homeowners. However, although the number of Black or African American homeowners in census tract 217.17 was less than 100, the census tract met criteria 1 & 3. Therefore, it would still be a strategic use of resources to conduct outreach regarding home repair programs in this census tracts, as it is likely that there are Black or African American homeowners in this census tract that are experiencing disproportionately greater needs.
- Black or African American Renters Census tracts 217.16, 217.17, and 217.43 in the Western area
 of the city and census tracts 217.34 and 217.39 in the central area of the city met all three criteria.
 Therefore, it would be a strategic use of resources to conduct outreach regarding home repair
 programs in these census tracts.
- **Hispanic or Latino Homeowners** Census tracts 217.44 and 217.42 in the Western area of the City met all three criteria. Therefore, it would be a strategic use of resources to conduct outreach regarding home repair programs in these census tracts.

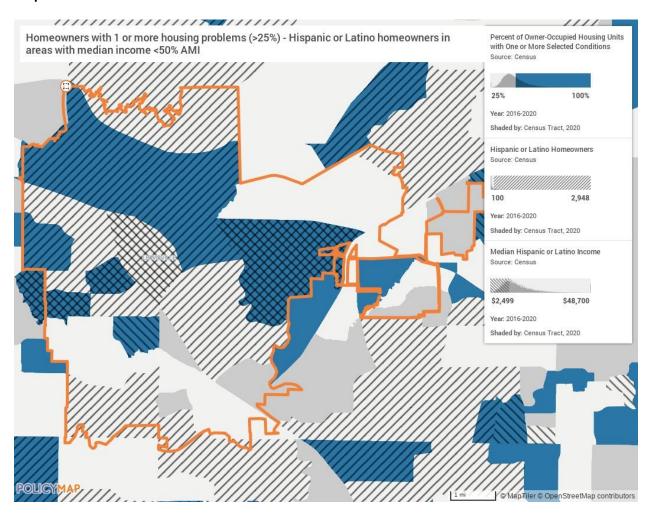
- Hispanic or Latino Renters Census tract 217.42 in the Western area of the city and census tracts 216.18 and 217.39 in the central area of the city met all three criteria. Therefore, it would be a strategic use of resources to conduct outreach regarding home repair programs in these census tracts.
- Asian Homeowners Census tract 217.42 in the Western area of the City met all three criteria.
 Therefore, it would be a strategic use of resources to conduct outreach regarding home repair programs in these census tracts.
- Asian Renters Census tract 217.42 in the Western area of the City met all three criteria.
 Therefore, it would be a strategic use of resources to conduct outreach regarding home repair programs in these census tracts.

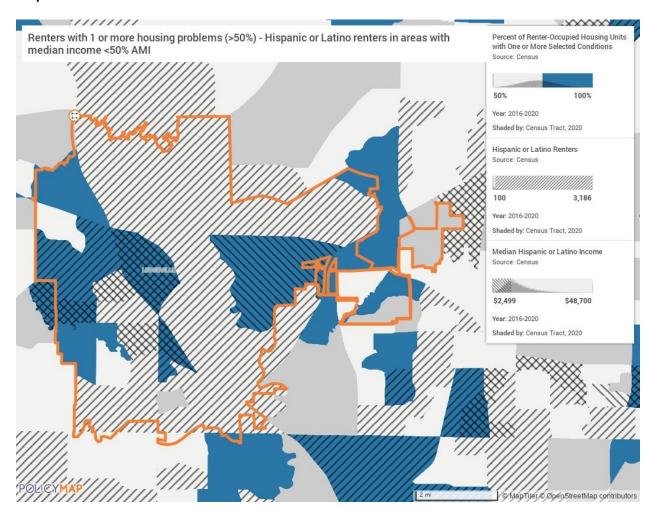
The following tables and maps are used to supplement the analysis of disproportionately greater housing needs:

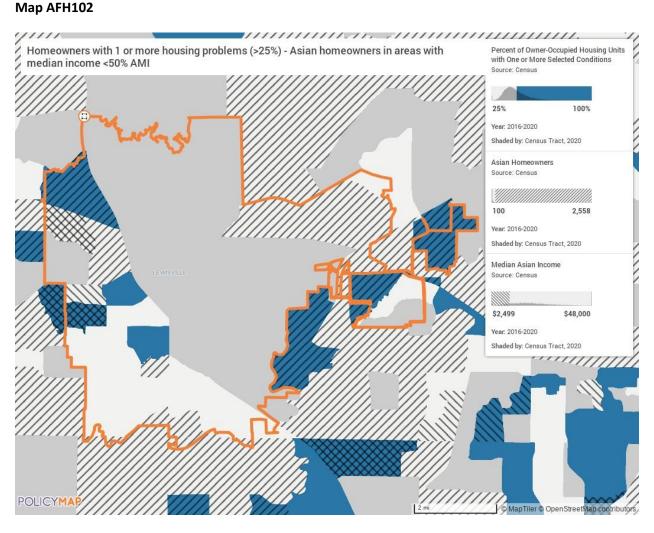
- Map AFH98: Homeowners with 1 or more housing problems (where the share of homeowners experiencing a problem is greater than 25% and where there are 100 or more Black or African American homeowners and where the median income for a Black or African American household is equal to less than 50% AMI for a household of 4) (2016-2020 ACS)
- Map AFH99: Renters with 1 or more housing problems (where the share of renters experiencing a
 problem is greater than 50% and where there are 100 or more Black or African American renters and
 where the median income for a Black or African American household is equal to less than 50% AMI
 for a household of 4) (2016-2020 ACS)
- Map AFH100: Homeowners with 1 or more housing problems (where the share of homeowners experiencing a problem is greater than 25% and where there are 100 or more Hispanic or Latino homeowners and where the median income for a Hispanic or Latino household is equal to less than 50% AMI for a household of 4) (2016-2020 ACS)
- Map AFH101: Renters with 1 or more housing problems (where the share of renters experiencing a problem is greater than 50% and where there are 100 or more Hispanic or Latino renters and where the median income for a Hispanic or Latino household is equal to less than 50% AMI for a household of 4) (2016-2020 ACS)
- Map AFH102: Homeowners with 1 or more housing problems (where the share of homeowners experiencing a problem is greater than 25% and where there are 100 or more Asian homeowners and where the median income for an Asian household is equal to less than 50% AMI for a household of 4) (2016-2020 ACS)
- Map AFH103: Renters with 1 or more housing problems (where the share of renters experiencing a problem is greater than 50% and where there are 100 or more Asian renters and where the median income for an Asian is equal to less than 50% AMI for a household of 4) (2016-2020 ACS)

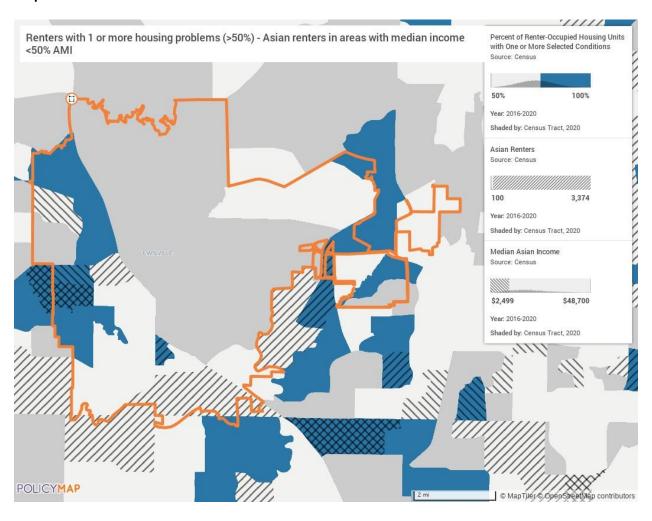












Publicly Supported Housing Analysis

Publicly Supported Housing Demographics

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

Denton Housing Authority, which services Lewisville, operates exclusively as a voucher program; DHA does not operate any public housing or project-based Section 8 developments. Since the housing authority primarily serves the City of Denton, but generally allows voucher holders to move through the North Texas region, it is difficult to gather and analyze data specific to Lewisville such as demographic characteristics of voucher holding families.

Figures pulled from DHA's most recent 5-Year Plan (2020-2025) indicate DHA has issued 1,876 housing vouchers and 635 applicants are on the waiting list. Two hundred forty-two (242) of DHA's vouchers were in use by persons living in the City of Lewisville. However, the number of vouchers has risen throughout the last two years as a result of greater need brought on by the coronavirus pandemic and additional pandemic-related funding. DHA's voucher waiting list has grown as well, to around 8,000 applicants.

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

The demographic breakdown of the DHA waiting list for housing choice vouchers pulled from DHA's 5-Year Plan (2020-2025), indicates the following: Hispanic residents are underrepresented on the list – they account for 6.5% of the persons on the waiting list even though they account for 20% of the population in Denton County; White residents are underrepresented on the waiting list – they account for 20% of the persons on the waiting list, whereas they compose 58% of the population in Denton County; and Black or African American residents are overrepresented on the list – they make up 78% of the persons on the waiting list, whereas they compose 10% of the population in Denton County.

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

In Denton County, 22% of voucher-holding households include a disabled person, which is the same for the State; Denton County's share of voucher-holding households headed by individuals 62 or older is lower than the State – 26% compared to 21%; Denton County's share of voucher-holding households headed by a female with children in higher than the State's – 51% compared to 46%.

Generally, to qualify for the Housing Choice Voucher program, a household must have an income of no more than 80% of the Area Median Income. Area Median Income (AMI) is a measure which uses the Median Family Income (MFI) estimations derived from Census data, adjusted for family size and location. For a four-person family in the Dallas HUD Metro FMR area, AMI is \$77,900 for a low-income family (or a family making no more than 80% of the MFII), \$48,700 for a very low-income family (a family of 4 making

no more than 50% of the MFI), and \$29,200 for an extremely low-income family (a family of four making no more than 30% of the MFI). **Maps AFH104-106** show the percentages of households with incomes less than \$75,000, \$50,000, and \$25,000, respectively between 2016 and 2020; this represents about 56%, 34%, and 11% of households within the City of Lewisville. The median income of a family with a single Female and children is under \$38,000, compared with the overall median family income in Lewisville, which is nearly \$78,000. This income gap indicates a need for more stable and affordable housing for the families of Lewisville.

Publicly Supported Housing Location and Occupancy

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

There are no R/ECAPs in Lewisville. **Map AFH107** shows tracts in Lewisville with residents receiving Housing Choice Vouchers. As depicted in **Map AFH108**: **Estimated median household income and location of LIHTC units**, the six LIHTC projects in Lewisville are spread throughout the city. Four of the six are located in census tracts with a median household income that is near or above the city's median household income, which is about \$67,000.

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

There are no R/ECAPs in Lewisville. There is some overlap between those areas with Housing Choice Vouchers and the share of persons with disabilities, which is shown in **Map AFH115**.

As shown in **Map AFH116**, several of the areas that have the highest shares of families with children are also areas where families supported by Housing Choice Vouchers are located. This correlation is enhanced by the fact that Lewisville is a suburb with a relatively high share of families throughout the city.

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

LIHTC developments in Lewisville are largely located in economically- and racially diverse census tracts. As **Map AFH111** shows, there are a few tracts on the western edge of the City that have lower proportions of people of color and have no LIHTC developments. Presumably, these tracts are home to higher shares of White and/or higher income residents. No noticeable patterns appeared for families with children or residents with disabilities.

Disparities in Access to Opportunity

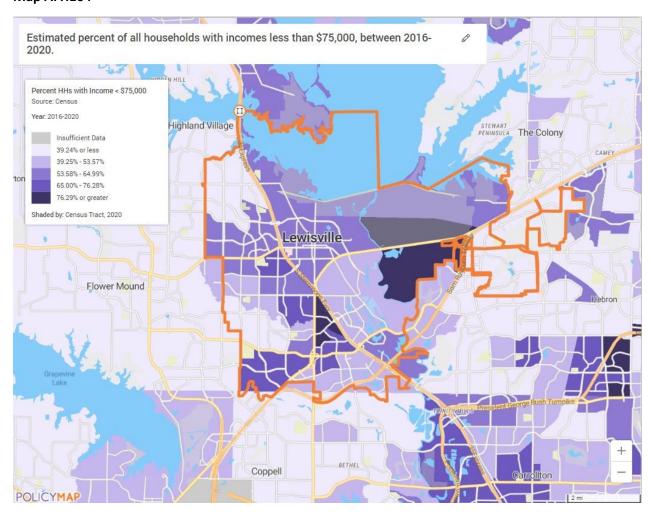
Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily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

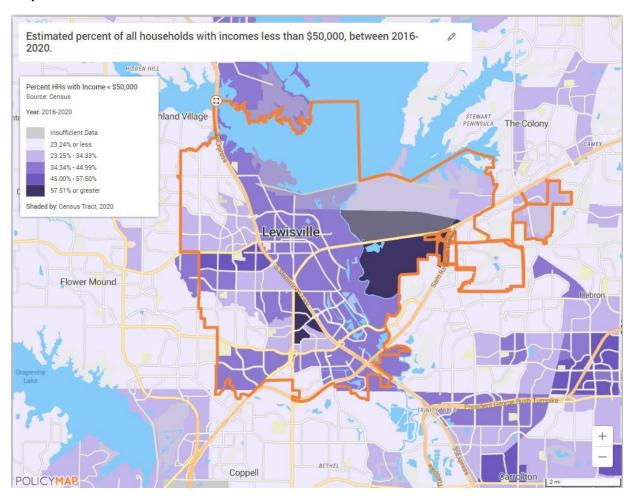
Multiple survey respondents said that the City should not engage in any actions that encourage people who cannot afford the current rents or sales prices to move to Lewisville. Commentators voiced opinions that low-income persons, including persons using housing vouchers, would become an additional burden on existing tax-paying Lewisville residents.

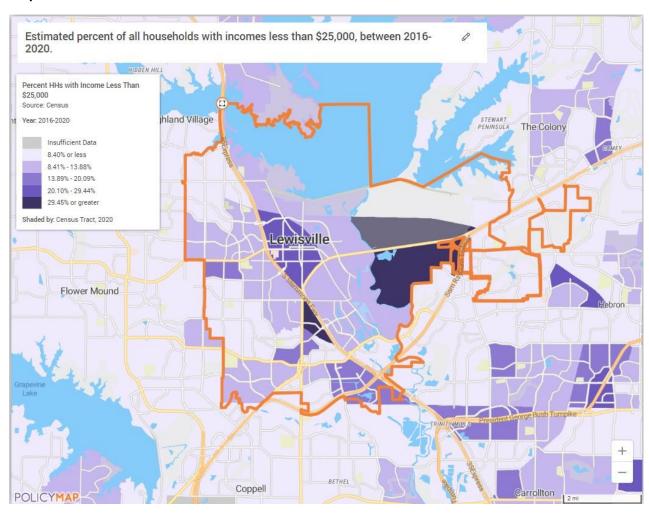
Several survey respondents voiced the opinion that landlords should not accept housing vouchers because properties become "bad" and "crime-ridden" when voucher-recipients live at the property.

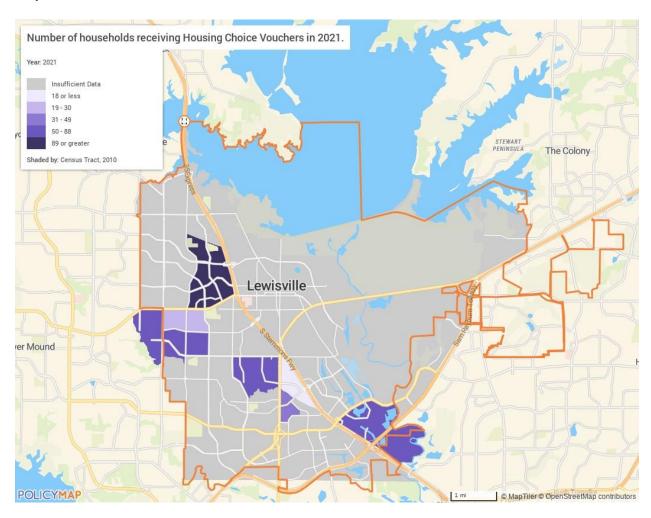
The following tables and maps are used to supplement the analysis of publicly supporting housing:

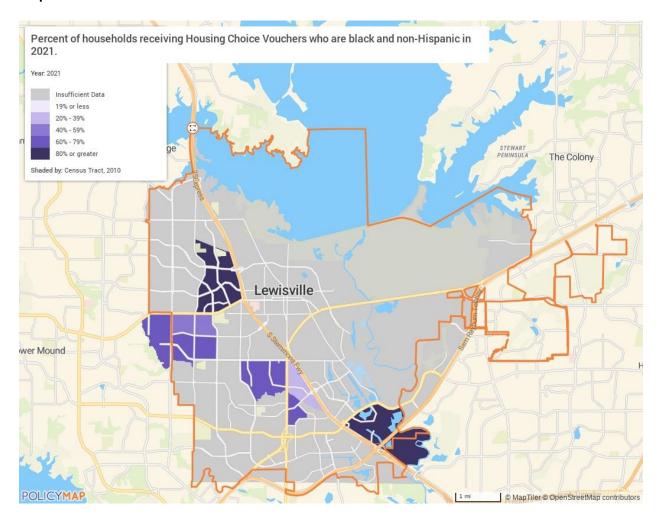
- Map AFH104: Estimated percent of all households with incomes less than \$75,000 (2016-2020 ACS)
- Map AFH105: Estimated percent of all households with incomes less than \$50,000 (2016-2020 ACS)
- Map AFH106: Estimated percent of all households with incomes less than \$25,000 (2016-2020 ACS)
- Map AFH107: Percent of all households that receive Housing Choice Vouchers (HUD 2021)
- Map AFH108: Percent of households receiving Housing Choice Vouchers who are Black and Non-Hispanic (HUD 2021)
- Map AFH109: Percent of households receiving Housing Choice Vouchers who are White and Non-Hispanic (HUD 2021)
- Map AFH110: Percent of households receiving Housing Choice Vouchers who are Asian or Pacific Islander and Non-Hispanic (HUD 2021)
- Map AFH111: Percent of households receiving Housing Choice Vouchers who are Hispanic (HUD 2021)
- Map AFH112: Percent of households receiving Housing Choice Vouchers where the head or spouse is age 62 or older (HUD 2021)
- Map AFH113: Percent of households receiving Housing Choice Vouchers that live in a household where a person has a disability (HUD 2021)
- Map AFH114: Estimated median income of a household and location of LIHTC units (2016-2020 ACS)
- Map AFH115: Estimated percent of people with one or more disabilities (2016-2020 ACS)
- Map AFH116: Estimated percent of all families that have children (2016-2020 ACS)
- Map AFH117: Estimated percent of population that is people of color (2016-2020 ACS)

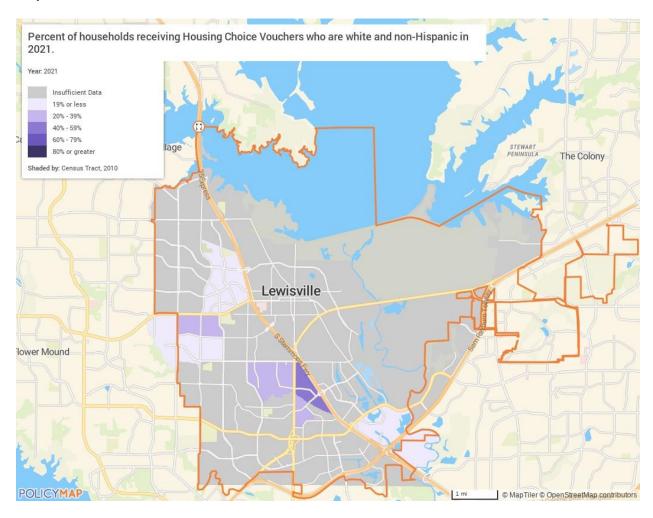


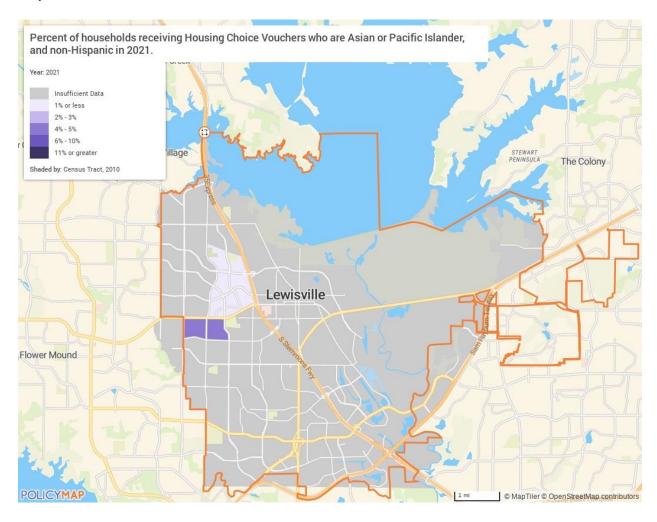


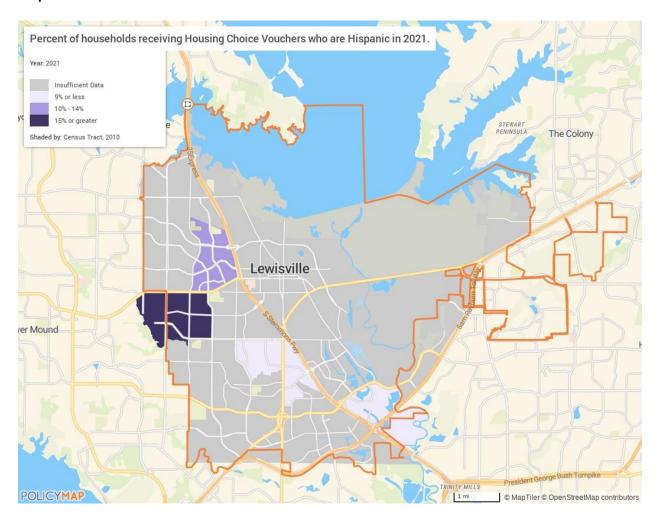


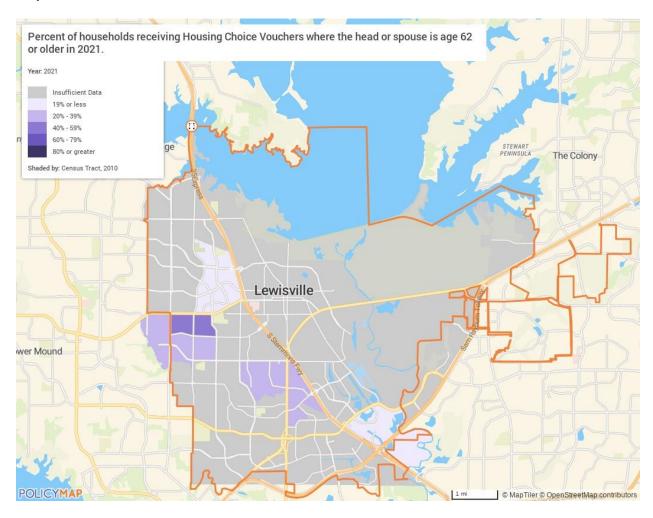


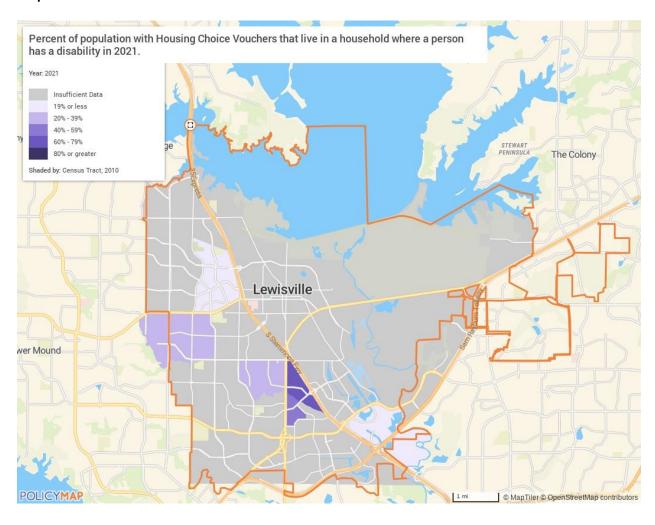


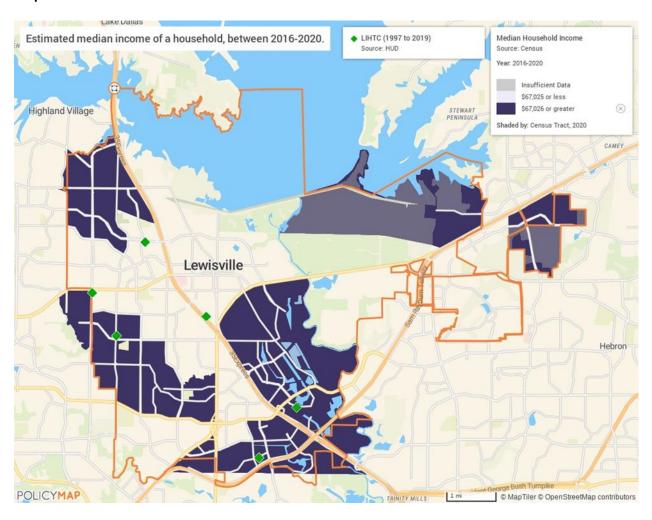


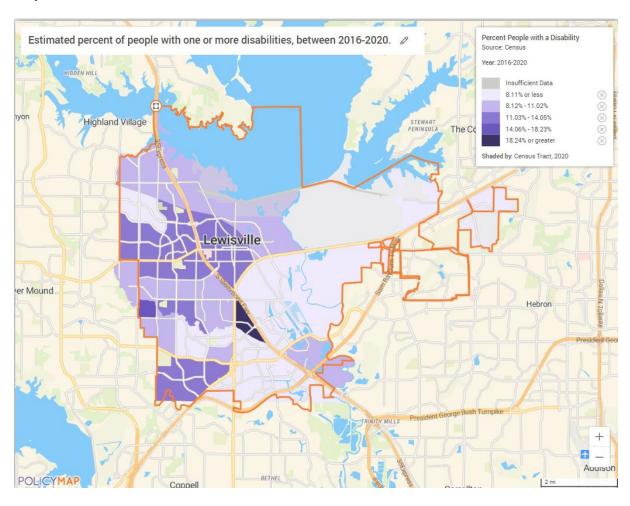


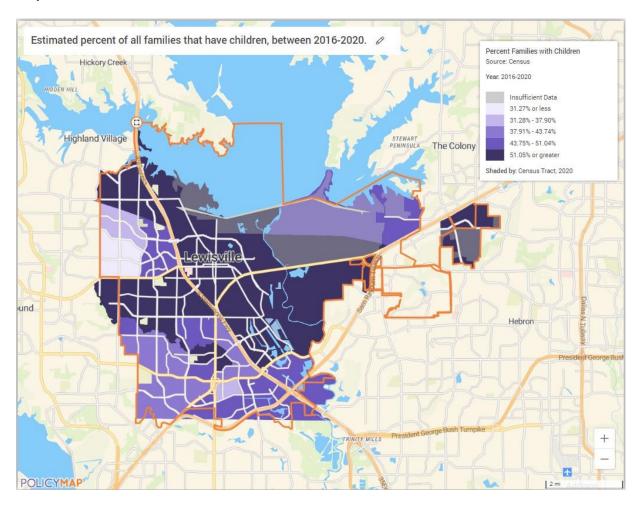


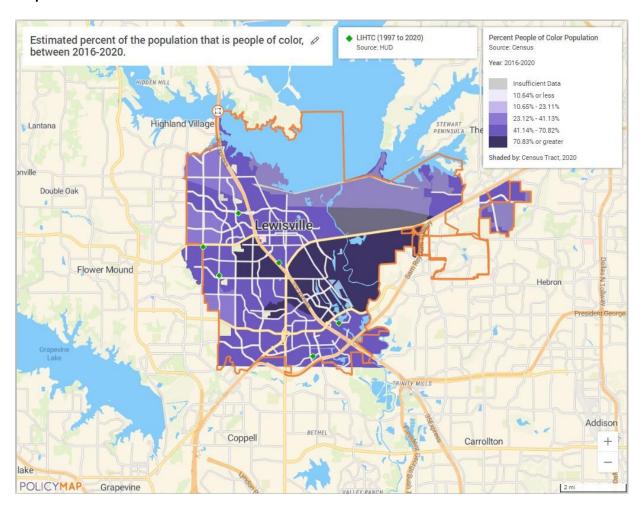












Disability and Access

Population Profile

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

According to 2016-2020 ACS data, 9.4% of Lewisville's noninstitutionalized population has a disability, which is lower than the statewide percentage of 11.5%. Thirty-six-point five percent (36.5%) of residents aged 65 and older are disabled; this represents an increase of 4.1% compared to the data from 2015-2019.

Nearly 20% of persons living in the Triangle neighborhood have a disability, which 5 percentage points higher than any other area in Lewisville. As was discussed in the HUD Consolidated Plan, households living in the Triangle neighborhood have low incomes compared to the rest of the City; the two census tracts with the lowest median incomes are both in the Triangle neighborhood – census tract 217.34 has a median income of \$45,329 and census tract 217.39 has a median income of \$36,375.

Additionally, unlike the rest of Lewisville, in which single-family housing predominates, only 0.62% of the housing stock in the Triangle is single family homes — the vast majority of the housing units are apartments. Furthermore, between 25-65% of the apartments in the Triangle neighborhood were built between 1980-1989, meaning that they were constructed approximately 30-40 years ago, prior to the passage of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. As such, public access areas in these apartments, such as leasing offices, may not be fully accessible. Likewise, these older properties may have numerous structural repair needs related to balconies and exterior staircases that make it difficult or event dangerous for persons with visual impairments and ambulatory disabilities to navigate the exterior of the apartment complex.

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

Maps AFH118-126 display the areas in the City where persons with each type of disability and persons with disabilities in different age ranges reside.

Disability type - For all types of disabilities, persons with disabilities are more heavily concentrated in the Triangle neighborhood than in other areas of the City. In addition to the Triangle neighborhood, persons with ambulatory, self-care and independent living difficulties are concentrated in the north central area of the City and in a census tract in the western area of the City (south of S. Main). Persons with vision difficulties and cognitive difficulties reside in relatively even numbers across the City, while persons with hearing difficulties tend to reside in the census tracts west of I-35.

Age group – Persons under the age of 18 with a disability reside in relatively even numbers across the City, as may be expected since these individuals are likely living with adults who serve as their caregivers and make decisions about housing locations. Persons between the ages of 18-64 with a disability are concentrated in the north central area of the City with the Triangle neighborhood being a secondary area of concentration whereas elderly persons with a disability are heavily concentrated in the Triangle. This may be due to the high number of rental housing units in the Triangle that are studios or 1-bedroom units, which, traditionally, would accommodate no more than 2 persons.

Housing Accessibility

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

Lewisville has approximately 10,00 residents who have one or more disabilities. The Texas Department of Housing and Community Affairs' (TDHCA) Vacancy Clearinghouse provides information on privately owned properties that are required to set aside some units for lower income persons and families. Each of these properties provides some accessible units. In the case of Lewisville, there are six properties, all of which participate in the Low Income Housing Tax Credit (LIHTC) program. In total, the six properties provide the following number of accessible units per unit size:

- Efficiency = 0
- 1 bedroom = 21
- 2 bedroom = 47
- 3 bedroom = 32
- 4 bedroom = 0
- 5 or more bedrooms = 0

Only 20 of these units are currently listed as vacant and available for rent per the TDHCA website. In the nearby City of Denton, there are 119 accessible units of varying unit sizes. Therefore, it is evident that there is a significant need to produce more affordable, accessible units in the City and the broader region.

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

The City of Lewisville does not have any R/ECAPs. However, the six LIHTC projects in Lewisville are spread throughout the city. Four of the six are located in census tracts with a median household income that is near or above the city's median household income, which is about \$67,000.

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

The City of Lewisville does not have any public housing units; accessible LIHTC units were discussed above. Additionally, the City of Lewisville participates in the Denton County Homeless Coalition, which administers Permanent Supportive Housing (PSH) units. The PSH program consists of long-term housing assistance and services for households with at least one member who has a disability, and is provided by Denton County MHMR, Giving Hope, Inc., and the Housing Authority of Denton (HUD-Veterans Affairs Supportive Housing).

Additionally, Community Options Inc., a national non-profit organization, receives HUD Section 811 funding for 6 supportive housing units for disabled, very- and extremely-low-income persons. Their contract is reviewed and renewed on an annual basis; the last renewal was on 2/1/2022.

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

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

As discussed in the prior question, Community Options Inc., a national non-profit organization, receives HUD Section 811 funding for 6 supportive housing units for disabled, very- and extremely-low-income persons. These supportive units allow persons with disabilities to receive the support they need outside of an institutional/segregated setting.

Lewisville has no Intermediate Care Facilities for individual with intellectual disabilities (ICF/IID). Such facilities have 24-hour staffing and can assist residents with medication management and activities of daily living. The Denton County MHMR Center previously operated 6 ICF within Denton County but will likely operate only 4 facilities in 2023 due to staffing shortages. Taking the place of licensed ICF are unlicensed group homes, which, according to stakeholders, often do not provide safe and sanitary living conditions and may financially exploit their residents.

Additionally, Denton County MHMR employs a hospital liaison who "monitors and advocates for all individuals admitted to the state hospitals. Our Hospital Liaison visits North Texas State Hospital on a weekly basis. Upon discharge from the hospital, individuals meet with the hospital liaison for assistance with community reintegration."

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

Stakeholders shared that there is only one state-licensed All Day Activity Provider (sometimes referred to as Adult Day Care) in Lewisville. Likewise, as discussed in the prior question, Lewisville has no Intermediate Care Facilities for individual with intellectual disabilities (ICF/IID).

Disparities in Access to Opportunity

To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning: Government services and facilities, Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals), Transportation, Proficient schools and educational programs; and Jobs

Transportation - While the GoZone service allows users to request a wheelchair-accessible vehicle, there is no information related to accessibility accommodations/modification for persons with other disabilities, such as cognitive or visual disabilities. The DCTA provides a separate Access on Demand service for persons with physical, visual and cognitive disabilities - however individuals must apply and be certified as eligible before they may use this service.

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

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990, The City of Lewisville, Texas will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Lewisville does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the Americans with Disabilities Act (ADA).

Effective Communication: The City of Lewisville will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in City programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Lewisville will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited.

The ADA Coordinator for the public services provisions of the ADA (Title II), covering program accessibility, communications, architectural barrier, and transportation issues should contact Keith Marvin, Director of Public Services, kmarvin@cityoflewisville.com, 972.219.3531 as soon as possible but no later than 48 hours before the scheduled event.

The ADA Coordinator for employment provisions of the ADA covering all employment practices, including job application procedures, hiring, advancement, discharge, compensation, job training and other terms, conditions and privileges of employment should contact Matt Grebliunas, Director of Human Resources, mgrebliunas@cityoflewisville.com, 972.219.3453.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

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

Stakeholder feedback indicated that persons with disabilities may experience problems with *maintaining* homeownership. Several leaders of non-profit organizations that primarily serve low- and moderate-income persons aged 65 and older noted that many of their clients are single family homeowners who struggle to maintain their homes. Such homeowners often end up confined to living in certain areas of their house, due to maintenance issues that create safety hazards (ex. holes in floors, leaking roof) or lack of accessible features, such as grab bars in bathroom showers/tubs or lowered kitchen countertops. Additionally, an inability to pay for whole-home heating and cooling costs can lead such residents to isolate themselves in one room that can be adequately heated or cooled.

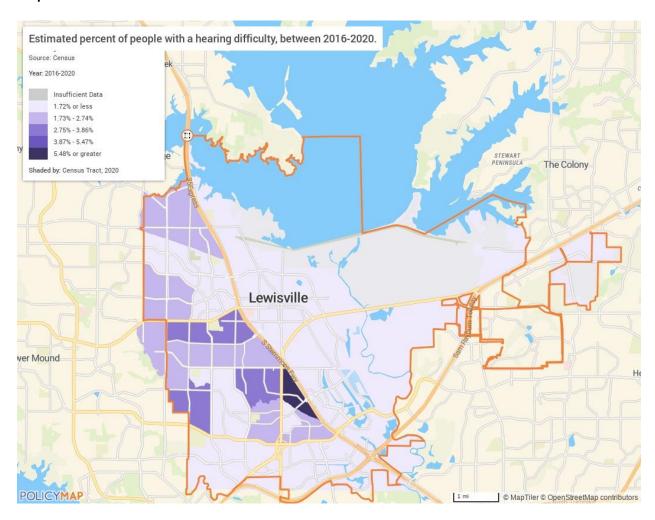
Disproportionate Housing Needs

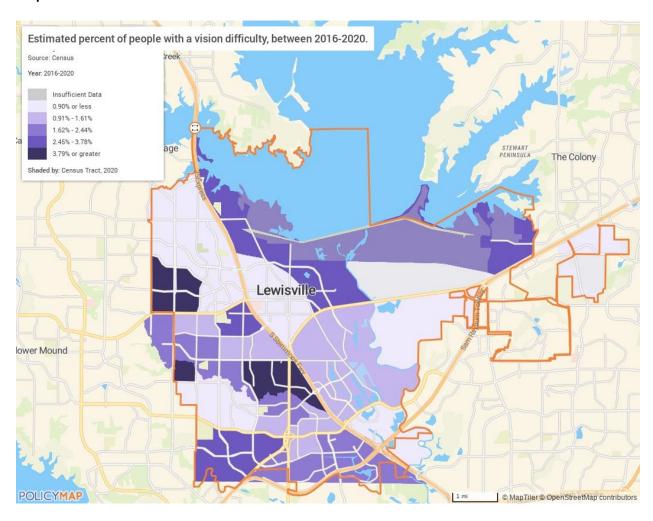
Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

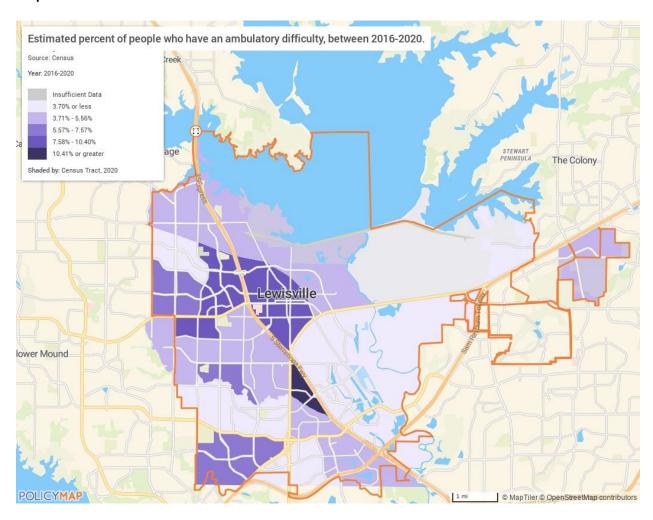
Stakeholders indicated that many LMI households are struggling with the double tsunami of rising housing costs and rising food costs. Stakeholders noted that these rising prices have severely impacted elderly persons and other individuals on a fixed income, including disabled individuals who cannot work, and who do not have the ability to take on extra shifts or work a second job in order to deal with rising prices. Instead, such persons are forced to cut back on items such as food and prescriptions. One participant noted that LMI seniors who receive a free or reduced-price lunch will often eat half of the meal and save the rest for dinner. Due to the lack of walkability in many areas of Lewisville, there is also a need for food delivery to persons who are homebound or have limited access to transportation options.

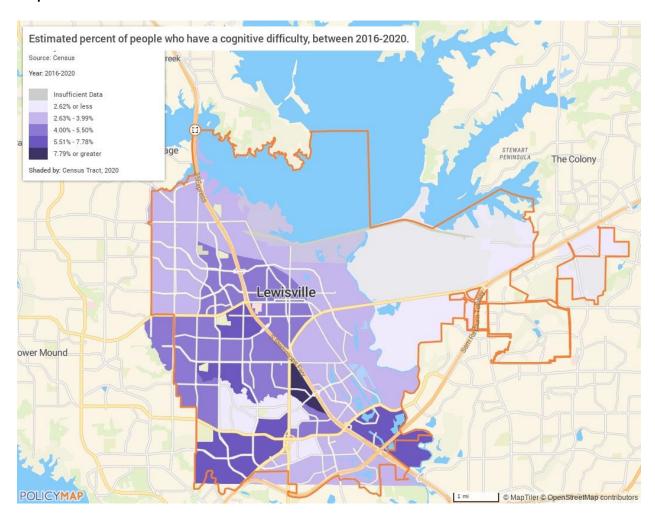
The following tables and maps are used to supplement the analysis of disability and access:

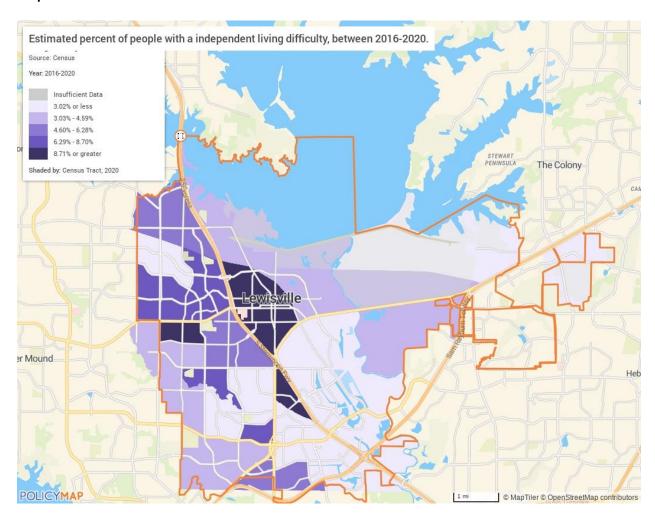
- Map AFH118: Estimated percent of people with a hearing difficulty (2016-2020 ACS)
- Map AFH119: Estimated percent of people with a vision difficulty (2016-2020 ACS)
- Map AFH120: Estimated percent of people who have an ambulatory difficulty (2016-2020 ACS)
- Map AFH121: Estimated percent of people who have a cognitive difficulty (2016-2020 ACS)
- Map AFH122: Estimated percent of people with an independent living difficulty (2016-2020 ACS)
- Map AFH123: Estimated percent of people with a self-care difficulty (2016-2020 ACS)
- Map AFH124: Estimated percent of people under age 18 with one or more disabilities (2016-2020 ACS)
- Map AFH125: Estimated percent of people age 18-64 with one or more disabilities (2016-2020 ACS)
- Map AFH126: Estimated percent of people 65 or older with one or more disabilities (2016-2020 ACS)

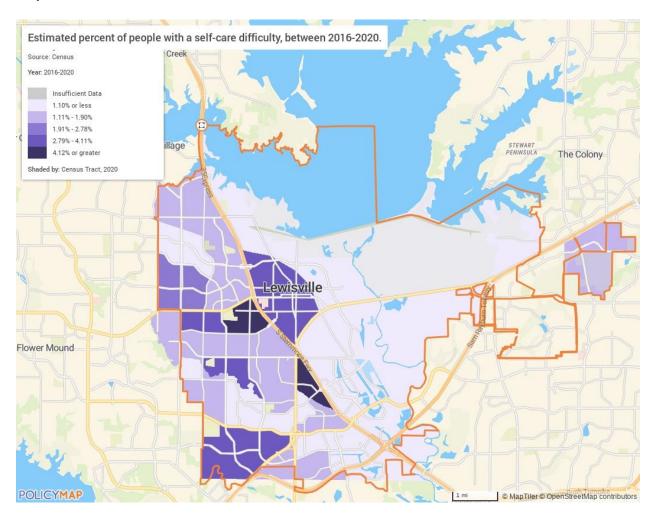


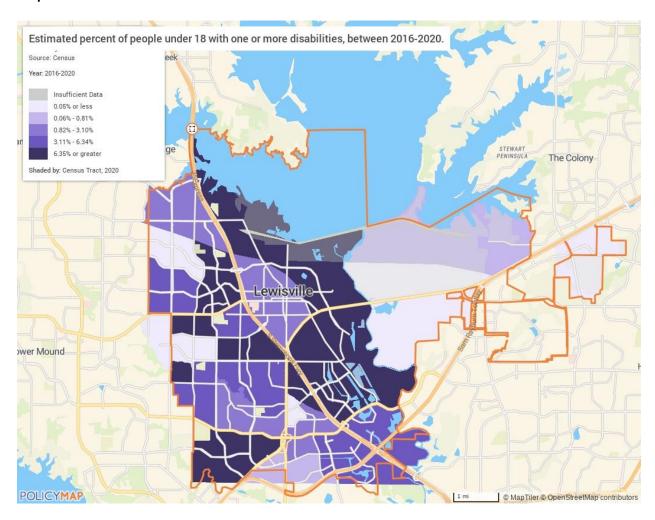


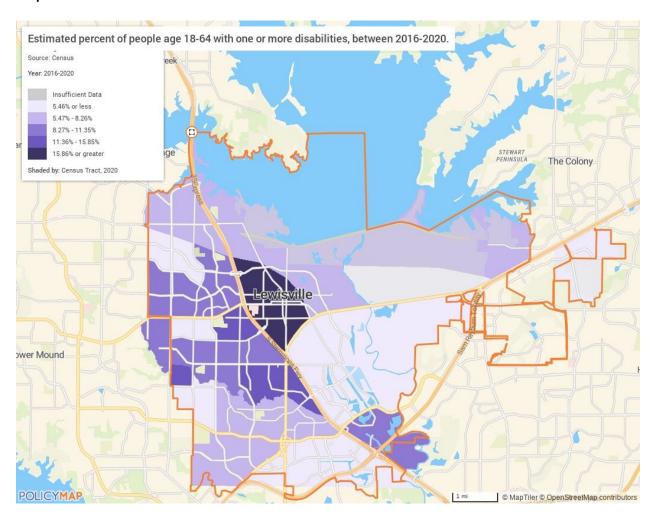


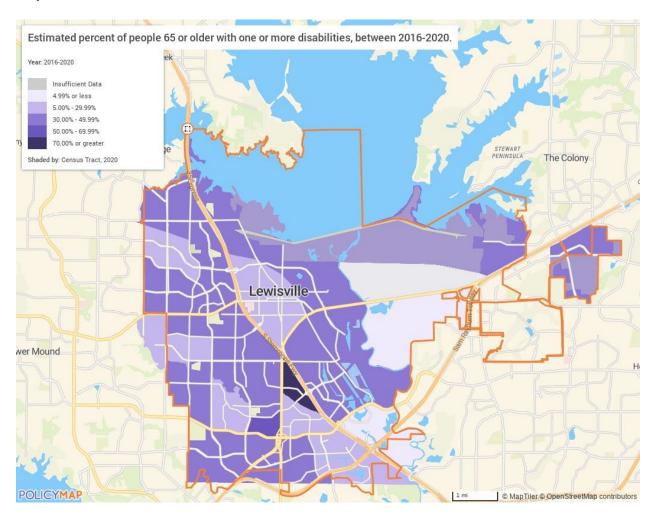












Fair Housing Enforcement, Outreach Capacity and Resources

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

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

The City of Lewisville has no unresolved fair housing issues, as described above.

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

In Texas, municipalities are prohibited by state law from adopting and enforcing ordinances that prohibit discrimination based on a renter's source of income, unless the renter is a veteran. In mid-2022, the Inclusive Communities Project (ICP) surveyed 5 landlords in Lewisville that advertised rents that were within HUD's Fair Market Rent payment standard; however, none of the surveyed properties accepted Section 8 housing vouchers. Local stakeholders confirmed the accuracy of ICP's survey results related to landlords' refusal to accept housing vouchers. However, at least one owner of several local properties in Lewisville does accept vouchers provided by multiple federal programs.

As discussed above, the State of Texas prohibits municipalities from enacting ordinances that prohibit discrimination based on source of income. Likewise, the State's landlord-tenant law heavily favor landlords. For example, landlords are allowed to charge fees for late payment of rent that are up to 12% of the monthly rent. Landlords can charge an even higher amount if the fee is "not more than uncertain damages to the landlord related to the late payment of rent, including direct or indirect expenses, direct or indirect costs, or overhead associated with the collection of late payment." Additionally, landlords are not required to proactively notify a tenant that a late fee has been assessed. Moreover, if the tenant makes a late rental payment, the landlord can apply the payment to satisfy the fee, rather than first applying it to the outstanding rent amount. As such, a renter who makes one late rental payment can quickly find themselves with insurmountable delinquency due to the assessed fees. At a local level, the City of Lewisville has not amended its Fair Housing ordinance to specifically prohibit source of income discrimination related to veterans. About 6.1% of Lewisville's population is a veteran.

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

The City of Lewisville does not operate a stand-alone Fair Housing Department. Instead, persons who believe that they experienced housing discrimination in Lewisville are directed to file a complaint with HUD, the Texas Workforce Commission, or the North Texas Fair Housing Center (NTFHC). The NTFHC, which is based in Dallas, investigates housing discrimination complaints from 12 different counties in

Texas and provides fair housing-related training, yet it has only 3 employees and a budget of less than \$400,000.

Over the past 5 years, the City has sponsored at least 6 fair housing workshops conducted by the North Texas Fair Housing Center. Approximately 219 people attended these sessions, including from nonprofit agencies, the housing authority and landlords. Legal Aid of Northwest Texas also provided 2 legal webinars during the early stages of the COVID-19 pandemic.

Additionally, the City maintains a Fair Housing Page on City website to provide citizens with information and distributed Fair Housing literature and posters to social service agencies. Materials and to the public at Community Resource Expos. During the early stages of the COVID-19 pandemic, the city sponsored a call center that provided information to residents in need of resources during COVID-19.

Fair Housing Goals and Priorities

For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Fair Housing - Contributing Factors	5
Segregation/Integration	Priority
Displacement of residents due to economic pressures	High
Lack of regional cooperation	High
Loss of Affordable Housing	High
Source of income discrimination	High
Location and type of affordable housing	Medium
Community opposition	Medium
Lack of community revitalization strategies	Medium
Lack of private investments in specific neighborhoods	Medium
Lack of public investments in specific neighborhoods, including	
services or amenities	Medium
Land use and zoning laws	Medium
Lending discrimination	Low
Occupancy codes and restrictions	Low
Private discrimination	Low
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	
Displacement of residents due to economic pressures	High
Lack of local or regional cooperation	High
Loss of Affordable Housing	High
Location and type of affordable housing	Medium
Lack of community revitalization strategies	Medium
Lack of private investments in specific neighborhoods	Medium
Lack of public investments in specific neighborhoods, including	
services or amenities	Medium
Land use and zoning laws	Medium
Source of income discrimination	Medium
Community opposition	Medium
Deteriorated and abandoned properties	Low
Occupancy codes and restrictions	Low
Private discrimination	Low

Fair Housing - Contributing Factors	5
Disparities in Access to Opportunity	
Availability, type, frequency, and reliability of public transportation	High
Lack of access to opportunity due to high housing costs	High
Lack of local or regional cooperation	High
Location of proficient schools and school assignment policies	High
Loss of Affordable Housing	High
Source of income discrimination	High
Location and type of affordable housing	Medium
Impediments to mobility	Medium
Access to financial services	Medium
Lack of private investments in specific neighborhoods	Medium
Lack of public investments in specific neighborhoods, including	
services or amenities	Medium
Land use and zoning laws	Medium
Location of employers	Medium
Other - Lack of access to government and services	Medium
Lending discrimination	Low
Location of environmental health hazards	Low
Occupancy codes and restrictions	Low
Private discrimination	Low
Disproportionate Housing Needs	
Displacement of residents due to economic pressures	High
Displacement of and/or lack of housing support for victims of	
domestic violence, dating violence, sexual assault, and stalking	High
Lack of access to opportunity due to high housing costs	High
Loss of Affordable Housing	High
Source of income discrimination	High
Availability of affordable units in a range of sizes	Medium
Lack of private investments in specific neighborhoods	Medium
Lack of public investments in specific neighborhoods, including	
services or amenities	Medium
Land use and zoning laws	Medium
Lending discrimination	Medium

Fair Housing - Contributing Factors	S
Disability and Access Analysis	
Access to transportation for persons with disabilities	High
Lack of access to opportunity due to high housing costs	High
Lack of affordable, integrated housing for individuals who need	
supportive services	High
Lack of local or regional cooperation	High
Loss of Affordable Housing	High
Source of income discrimination	High
Access to publicly supported housing for persons with disabilities	Medium
Lack of affordable in-home or community-based supportive services Lack of affordable, accessible housing in range of unit sizes	Medium Medium
Lack of assistance for housing accessibility modifications	Medium
Access for persons with disabilities to proficient schools	Low
Inaccessible government facilities or services	Low
Inaccessible public or private infrastructure	Low
Lack of assistance for transitioning from institutional settings to	
integrated housing	Low
Land use and zoning laws	Low
Lending discrimination	Low
Location of accessible housing	Low
Occupancy codes and restrictions	Low
Regulatory barriers to providing housing and supportive services for	
persons with disabilities	Low
State or local laws, policies, or practices that discourage individuals	
with disabilities from living in apartments, family homes, supportive	
housing, shared housing and other integrated settings	Low
Fair Housing Enforcement, Outreach, Capacity & Resources	
Lack of local private fair housing outreach and enforcement	High
Lack of state or local fair housing laws	High
Lack of local public fair housing enforcement	Medium
Lack of resources for fair housing agencies and organizations	Medium
Unresolved violations of fair housing or civil rights law	Low

Fair Housing - Contributing Factors				
Contributing Factors		Description		
Displacement of residents due to economic pressures		The median household income in Lewisville is \$67,000. However, the median household income is \$73,246 for White, Non-Hispanic households, while the median household income is \$56,523 for Black or African American households and \$60,437 for Hispanic or Latino households. Likewise, a higher percentage of persons with a disability are living in poverty (13.6%) than persons without a disability (8.1%). As such, Black and Hispanic households, along with disabled persons, are likely to be more vulnerable to economic pressures such as rising home sales values and rents, as well as rising costs for other goods and services that impact a household's budget. Both multifamily rental property managers and local service providers who work with low- and moderate-income individuals expressed concerns about housing stability as COVID-19 eviction moratoriums have expired and pandemic-related emergency rental assistance programs have ceased operation. These stakeholders explained that, especially in instances where an apartment community is owned by an institutional corporate landlord, property managers are under increasing pressure to evict tenants who are delinquent on rent and lease up units at higher rental rates. Social services agencies are fielding calls from property managers who are trying to find assistance for long-term residents who are now at risk of being evicted.		
Loss of affordable housing	High	The six LIHTC projects in Lewisville are spread throughout the city, and 4 out of 6 them are located in census tracts with median household income is near or above the city's median household income, which is about \$67,000. Two of the six Low Income Tax Credit (LIHTC) properties in Lewisville – St. Charles and Valley Ridge apartments are at extreme risk of being lost from the affordable housing inventory, since their extended use period ends sometime between 2022 and 2025. If all the low-income units at these properties transitioned to market rate units, there would a loss of 318 affordable units. Oak Tree Village, was previously at risk of being lost from the affordable housing inventory, but the Plano Housing Authority partnered with a private developer to maintain the affordability of the units.		
Source of income discrimination	High	In Texas, municipalities are prohibited by state law from adopting and enforcing ordinances that prohibit discrimination based on a renter's source of income, unless the renter is a veteran. In mid-2022, the Inclusive Communities Project (ICP) surveyed 5 landlords in Lewisville that advertised rents that were within HUD's Fair Market Rent payment standard; however none of the surveyed properties accepted Section 8 housing vouchers. Local stakeholders confirmed the accuracy of ICP's survey results related to landlords' refusal to accept housing vouchers. However, at least one owner of several local properties in Lewisville does accept vouchers provided by multiple federal programs.		

Fair Housing - Contributing Factors		
Contributing Factors		Description
Lack of access to opportunity due to high housing costs		Housing that is located near the Western and Eastern borders of Lewisville is sold and rented at much higher price points than housing located along the I-35 corridor that runs through the center of Lewisville. For example, average rents are typically \$300-\$400 higher in the Western areas of Lewisville compared to the I-35 corridor. Likewise, the Western areas of Lewisville have higher-performing schools and better access to full-scale grocery stores with fresh, healthy foods selections, such as Tom Thumb and Albertsons, as compared to Dollar General.
Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking	High	According to the United Way of Denton County, which serves as the backbone of a public-private partnership to lead a collective impact initiative addressing homelessness across the Denton County community, more than 80% of women and children experiencing homelessness have been victims of domestic violence. Additionally, an analysis of trends related to homelessness in Denton County revealed that in years 2018-2020, the total number of people experiencing homelessness who were members of families with children constituted between 1%-7.2% of all household members experiencing homelessness, whereas in 2022, the percentage was 17.6%. The United Way of Denton County analyzed the need for rapid re-housing units in Lewisville, which would be a common source of housing for homeless families who are victims of domestic violence, and estimated a need for 304 additional rapid re-housing units to serve the existing need.
Lack of affordable, integrated housing for individuals who need supportive services	High	Stakeholders shared that there is only one state-licensed All Day Activity Provider (sometimes referred to as Adult Day Care) in the City of Lewisville. Likewise, Lewisville has no Intermediate Care Facilities for individuals with intellectual disabilities (ICF/IID). Such facilities have 24-hour staffing and can assist residents with medication management and activities of daily living. The Denton County MHMR Center previously operated 6 ICF facilities within Denton County, but will likely operate only 4 facilities in 2023 due to staffing shortages. Taking the place of licensed ICF are unlicensed group homes, which, according to stakeholders, often do not provide safe and sanitary living conditions and may financially exploit their residents.
Availability, type, frequency, and reliability of public transportation	High	Lewisville is also a city that is bisected by numerous large highways and there are limited transportation options for people who do not have access to an automobile. There are not enough walking and biking routes that allow people to safely access their job, school, doctor's offices, grocery store or community centers. Additionally, in 2021, the regional transit authority – Denton County Transit Authority (DCTA) – discontinued fixed-route bus service in Lewisville. The replacement public transit option is GoZone On Demand service, an on-demand rideshare service operated by a private provider. Local service providers and residents expressed numerous concerns about the design and structure of the program and voiced the opinion that the GoZone On-Demand service has additional opportunities to address the needs of low- and moderate-income households.

Fair Housing - Contributing Factors				
Contributing Factors		Description		
Access to transportation for persons with disabilities		See comments above. While the Go Zone service allows users to request a wheelchair-accessible vehicle, there is no information related to accessibility accommodations/modification for persons with other disabilities, such as cognitive or visual disabilities. The DCTA provides a separate Access on Demand service for persons with physical, visual and cognitive disabilities - however individuals must apply and be certified as eligible before they may use this service.		
Location of proficient schools and school assignment policies	High	Lewisville ISD assigns students to schools based on the student's home address, which can lead to socio-economic and racial/ethnic segregation in schools, since Lewisville's neighborhoods have moderate levels of socio-economic and racial/ethnic segregation. Lewisville does allow for students to request to transfer out of their home school; however students are not eligible if, in the prior year, the student had more than 8 unexcused absences, more than 10 unexcused late arrivals to school, or total attendance (excused and unexcused) lower than 90%. Additionally, the student must not have been expelled, placed at DAEP, or engaged in persistent misbehavior (3 or more office referrals) and must have passed all classes (most recent semester for secondary, last yearly average for elementary). These transfer policies can be burdensome for students living in homeless or low-income households that experience housing instability, along with Black and Hispanic students who, per LISD statistics, tend to score "Approaches Grade Level or Above" on standardized tests at lower rates than White, Non-Hispanic students.		
Lack of regional cooperation	High	The City of Lewisville is continually looking for ways to coordinate with agencies and governmental partners. The City of Lewisville has appointees on the Behavioral Health Leadership Team (BHLT) and the Homelessness Leadership Team (HLT) through United Way of Denton County. However, currently, there is no regional coordination across counties in the North Texas region specifically related to addressing housing affordability and housing accessibility along with closely-related factors such as transportation and employment. The need for regional collaboration was mentioned in comments submitted related to Lewisville's last AFH.		

Fair Housing - Contributing Factors				
Contributing Factors		Description		
Lack of resources for fair housing agencies and organizations	High	The City of Lewisville does not operate a stand-alone Fair Housing Department. Instead, persons who believe that they experienced housing discrimination in Lewisville are directed to file a complaint with HUD, the Texas Workforce Commission, or the North Texas Fair Housing Center (NTFHC). The NTFHC, which is based in Dallas, investigates housing discrimination complaints from 12 different counties in Texas and provides fair housing-related training, yet it has only 3 employees and a budget of less than \$400,000.		
Lack of state or local fair housing laws	High	As discussed above, the State of Texas prohibits municipalities from enacting ordinances that prohibit discrimination based on source of income. Likewise, the State's landlord-tenant laws heavily favor landlords. For example, landlords are allowed to charge fees for late payment of rent that are up to 12% of the monthly rent. Landlords can charge an even higher amount if the fee is "not more than uncertain damages to the landlord related to the late payment of rent, including direct or indirect expenses, direct or indirect costs, or overhead associated with the collection of late payment." Additionally, landlords are not required to proactively notify a tenant that a late fee has been assessed. Moreover, if the tenant makes a late rental payment, the landlord can apply the payment to satisfy the fee, rather than first applying it to the outstanding rent amount. As such, a renter who makes one late rental payment can quickly find themselves with insurmountable delinquency due to the assessed fees. At a local level, the City of Lewisville has not amended its Fair Housing ordinance to specifically prohibit source of income discrimination related to veterans. About 6.1% of Lewisville's population are veterans.		
Other - Lack of resources in both public and private organizations related to language access and provision of services to racially and ethnically diverse populations.	High	Lewisville is a racially and ethnically diverse city. The White population comprises 36.37% of Lewisville residents, while 15.8% of residents identify themselves as Black or African American, and 11.3% of residents identify themselves as Asian. Slightly over 32% of Lewisville residents identify their ethnicity as Hispanic or Latino (of any race). American Community Survey data (ACS 2016-2020) indicates that 9,864 people who speak Spanish as their primary language (10.6% of the Lewisville population age 5 years and over) report speaking English "less than very well." Additionally, 1,161 people who speak Chinese as their primary language (1.3% of the population) report speaking English "less than very well" and 789 people who speak an "Other" Asian language (0.9% of the population) report speaking English "less than very well." Stakeholders indicated that persons with Limited English Proficiency (LEP) do not regularly participate in civic activities in Lewisville and that their valuable insight and feedback is often not fully captured and incorporated into strategic plans, service delivery design, and community celebrations.		

For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

	Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for	Responsible Program
				Achievement	Participants
1	Prevent displacement by repairing 10 units of housing owned by a low- or moderate-income homeowner and 30 units of naturally-occurring affordable rental housing.	Displacement of residents due to economic pressures; Loss of Affordable Housing	Disproportionate housing needs	Within 5 years, repair 10 units of housing owned by a low- or moderate-income homeowner and 30 units of naturally-occurring affordable rental housing.	City of Lewisville
2	Prevent displacement by increasing LMI household's access to eviction- prevention counseling and legal services in order to prevent at least 25 households from being evicted.	Displacement of residents due to economic pressures	Disproportionate housing needs	Within 5 years, increase LMI household's access to eviction-prevention counseling and legal services in order to prevent at least 25 households from being evicted.	City of Lewisville
3	Improve access to opportunity by constructing at least one complete street in the Triangle neighborhood that is designed and operated to enable safe use and support mobility for all users, including people of all ages and abilities, and regardless of whether they are travelling as drivers, pedestrians, bicyclists, or public transportation riders.	Lack of public investments in specific neighborhoods, including services or amenities	Access to opportunity	Within 5 years, construct at least one Complete Street in the Triangle neighborhood	City of Lewisville
4	Improve access to opportunity by collaborating with government representatives, persons receiving portable housing subsidies (vouchers or emergency rental assistance), and landlords in the North Texas region related to housing, employment and transportation access.	Lack of local or regional cooperation; Source of income discrimination	Access to opportunity	Within 1 year, convene a regional meeting; Within 3 years develop a strategic plan	City of Lewisville
5	Collaborate with lenders to increase home purchase opportunities so that at least 5 LMI households are able to purchase homes in Lewisville.	Access to financial services; Lending discrimination; Lack of access to opportunity due to high housing costs	Segregation/Integration, Access to opportunity	Within 5 years, at least 5 LMI households are able to purchase homes in Lewisville	City of Lewisville

	Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participants
6	Finalize development code changes that allow for development of missing middle housing and implement strategies that facilitate development of missing middle housing	Land use and zoning laws; Lack of access to opportunity due to high housing costs	Segregation/Integration, Access to opportunity	Within 1 year, finalize development code changes; Within 3 years develop a toolkit	City of Lewisville
7	Provide a Resolution of Support for at least one proposed affordable rental housing development near transit and provide support related to rezoning and other entitlements.	Lack of private investments in specific neighborhoods	Segregation/Integration, Access to opportunity, Disproportionate housing needs	Within the next 5 years, provide at least one Resolution of Support	City of Lewisville
8	Amend the Lewisville Fair Housing ordinance to prohibit the refusal to lease or rent a housing accommodation to a military veteran because of the veteran's lawful source of income to pay rent.	Source of income discrimination	Segregation/Integration, Access to opportunity	Within 1 year, adopt the amendment to the Fair Housing ordinance	City of Lewisville
9	Work with the Denton County Transit Authority to improve the GoZone On Demand service so that it is more accessible to: (1) families with young children by determining if car seats are required by law and then communicating expectations with riders prior to pick up, (2) persons with Limited-English Proficiency by enhancing language translation in marketing and customer service, (3) residents of apartment communities by increasing communication with residents and drivers regarding pick-up locations, and (4) shift workers by using operational data to evaluate the necessity and feasibility of expanding GoZone service hours. In addition, provide better access to paratransit (Access) service for persons with cognitive or visual disabilities by streamlining application and approval processes.	Availability, type, frequency, and reliability of public transportation	Access to opportunity	Within 6 months, meet with the DCTA; Within 1 year, Lewisville and DCTA facilitate stakeholder feedback meetings; Within 3 years DCTA implements system improvements	City of Lewisville

Listing of Maps, Tables and Graphic Used in the Assessment of Fair Housing

- **Table AFH1:** City population trends by age (2010 & 2020 Census)
- Table AFH2: City population trends by race (2010 & 2020 Census)
- Table AFH3: City population trends by ethnicity (2010 & 2020 Census)
- Table AFH4: Metro area population trends by race and ethnicity (2010 & 2020 Census)
- Map AFH5: Estimated number of people per square mile (2020 Census)
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- Map AFH7: Predominant racial or ethnic group (2013-2017 ACS, Census tract)
- Map AFH8: Predominant racial or ethnic group (2013-2017 ACS, Census block group)
- Map AFH9: Estimated percent of the population that is people of color (2016-2020 ACS)
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- Map AFH12: Percent of all people who are Black or African American (2020 Census)
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