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November 25, 2014

Secretary Julian Castro
Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, DC 20410-0500

Re: Affirmatively Furthering Fair Housing Assessment Tool, Docket No. FR-5173-N-02

Dear Secretary Castro,

We are pleased to submit comments to HUD on the proposed Affirmatively Further Fair Housing Assessment Tool (the "AFFH Tool" or simply the "Tool" hereafter) published for comment at 79 Fed. Reg. 57949 (Friday, September 26, 2014). We submit these comments on behalf of the diversitydata projects (diversitydata.org and diversitydatakids.org)[1] housed at the Institute for Child, Youth and Family Policy, at the Heller School for Social Policy and Management, Brandeis University (please see section on team qualifications at the end of this document).

We commend HUD for providing an assessment tool that will facilitate standardized monitoring of progress towards fair housing within and across jurisdictions. Given our expertise in the areas of racial/ethnic equity and child health/wellbeing, we have examined the Tool primarily from the perspective of two protected classes, families with children and racial/ethnic minorities; and importantly, have examined how the Tool considers the intersection of these two classes. While we focus on these two classes, many of our comments and suggestions are applicable to other protected classes.

This document is organized as follows:

- Section I (Summary Abstract) of this document starts by providing an overview/summary of our four main comments on the AFFH Tool.
- Sections II (Scaffolding for Equity Assessment), III (Geographic Benchmarks), IV (Data by Multiple Dimensions), V (Child Opportunity Index) provide more detailed discussion of each comment and examples of how HUD may alter the existing AFFH Tool to incorporate these comments.
- Section VI describes a number of additional comments to specific portions of the AFFH Tool, and
- Section VII includes qualifications of the team submitting these comments.

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[1] The diversitydata projects are funded by the Robert Wood Johnson Foundation and the W.K. Kellogg Foundation.

We understand that the instructions for the AFFH Tool have not yet been released and that some of our comments/recommendations may be more appropriately relevant to those instructions. Nevertheless, we offer comments now with the hope that they may inform and enrich the combined tool/instructions package.

Section I. Summary Abstract

Our four main comments are as follows:

- ➢ Comment 1: Provide more "scaffolding" to jurisdictions to complete equity assessments
- ➢ Comment 2: Provide additional guidance to jurisdictions regarding comparison region and geographic comparisons
- ➢ Comment 3: Provide data by multiple dimensions (e.g. poverty status and race/ethnicity) to facilitate more accurate equity comparisons
- ➢ Comment 4: Incorporate the newly released Child Opportunity Index[2] as a tool to enhance assessment of impediments to fair housing for families with children

Comment 1: Provide more "scaffolding" to jurisdictions to complete equity assessments

Ideally, a monitoring system to track equity in housing would include four iterative steps: 1) Analysis of summary indicators for protected classes 2) Analysis of "equity measures" (i.e. measures that allow comparisons, in absolute and relative terms, between groups along a given stratifying characteristic, e.g. protected class), 3) Develop narrative statements interpreting results of analyses, and 4) Use results to inform corrective actions.

We believe the AFFH Tool, as currently crafted, provides jurisdictions with a very rich set of data elements for completing step 1, analysis of summary indicators for protected classes. However, HUD could provide more explicit guidance in the Tool for completing steps 2 through 4. For steps 2 and 3, the tool could be strengthened by providing: (i) examples of "equity measures" that jurisdictions can construct from the tabular data, and (ii) examples of summary narrative statements to be completed by the jurisdictions. Regarding step 4, we understand that other organizations are submitting comments regarding jurisdictions' accountability for using data findings to implement corrective actions so we limit our comments to steps 2 and 3 (but fully support the efforts of colleagues regarding step 4).

See Section II below for a detailed discussion of this comment.

Comment 2: Provide additional guidance to jurisdictions regarding comparison region and geographic comparisons

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[2] The Child Opportunity Index was developed in partnership with the Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University (please see section on team qualifications at the end of this document).

A jurisdiction's assessment of equity in housing will depend greatly on its chosen reference "Region." We believe the tool should explicitly direct jurisdictions to compare themselves with their metropolitan area (or a sensible alternative geography, perhaps the county, for jurisdictions in non-metropolitan areas). This comparison is justifiable not only because residential segregation and neighborhood inequality operate across metropolitan regions, but also because HUD uses metropolitan areas for defining Fair Market Rents. Jurisdictions should also be encouraged to present comparisons with other jurisdictions that constitute a regional grouping for planning purposes (as currently specified in the AFFH Tool). In many cases, both will be required to comprehensively assess equity.

Regarding geographic comparisons, the tool should provide the jurisdiction with a framework for analyzing equity from three perspectives: **Within-jurisdiction inequity,** between subgroups within a jurisdiction, based on disaggregated data and summary measures of inequity; **Cross-jurisdiction variation in inequity**, for example, where the jurisdiction stands (e.g., rank) in relation to other jurisdictions in the region; and **Cross-jurisdiction comparisons of within-jurisdiction inequity**, for example, extent of racial/inequity in neighborhood exposure to poverty.

See Section III below for a detailed discussion of this comment.

Comment 3: Provide data by multiple dimensions (e.g. poverty status and race/ethnicity) to facilitate more accurate equity comparisons.

The Tool provides demographic data and other characteristics along only one dimension at a time. For major dimensions of interest, for example race/ethnicity and poverty status, providing counts and percentages across two (or more) dimensions will facilitate more accurate equity comparisons and will yield results that can better inform correct actions. Although it is important not to overwhelm jurisdictions with too much data disaggregation, data presented by multiple dimensions are often critical to understanding equity differences and for crafting possible solutions. Of particular importance are data that allow jurisdictions to analyze racial/ethnic patterns, controlling for poverty status. A common misunderstanding is that patterns of racial segregation are mostly explained by links between race/ethnicity and income. As an example, in the Boston Metropolitan Area, 32% of non-poor black children live in high poverty neighborhoods, compared to 3% of non-poor white children (Source: diversitydatakids.org). Separating issues of racial/ethnic and poverty/income is crucial for debunking these common misunderstandings and for informing corrective actions.

Comment 4: Incorporate the newly released Child Opportunity Index as a tool to better assess impediments to fair housing for families with children.

As researchers specializing in the relationship between children's neighborhoods and their wellbeing, we commend HUD for its attention to these issues evident in the provision of local-level data and maps

covering a range of neighborhood assets and stressors, and for facilitating explicit mapping of the location of children by race/ethnicity in the AFFH Tool. While the AFFH Tool represents a significant step forward, we believe that many jurisdictions[3] would greatly benefit from utilizing the newly-developed diversitydatakids.org-Kirwan Institute Child Neighborhood Opportunity Index (hereafter "COI"), a data and mapping tool specifically designed to assess racial/ethnic equity in access to neighborhood-based opportunities for children. The COI offers a widely available peer-reviewed data source for all census tracts in the 100 largest U.S. metro areas, in a non-technical, web-based format, allowing users to map the distribution of neighborhood opportunity for children and to overlay the child population by race/ethnicity onto this geography of opportunity.

See Section IV below for a detailed discussion of this comment.

II. Scaffolding for Equity Assessment

HUD's proposed assessment tool is an important step forward in standardizing data on fair housing across jurisdictions. The Tool should facilitate monitoring segregation trends and will hopefully highlight patterns and determinants of segregation which can then be directly addressed. The Tool includes a rich set of data elements, but would be improved if it provided jurisdictions with more guidance for analyzing and contextualizing that data. Ideally, a monitoring system to track equity should include the following iterative elements:[4]

(1) Summary indicators for various populations (currently provided in the AFFH Tool).
(2) Equity measures to allow comparisons between groups along a given stratifying characteristic or protected class:
    a. Equity measures include comparisons between two groups (e.g., differences and ratios) and across multiple groups (e.g., slope index of inequality).
    b. Equity measures can address absolute or relative differences.
(3) Narrative statements that summarize or provide an interpretation of the equity measures.
(4) Corrective actions informed by results of 1, 2 and 3 (and back to 1).

By providing assistance and scaffolding on the four elements above, the Tool can enhance jurisdictions' ability to synthesize and draw conclusions from the rich data tables and maps they will compile. Several major, data-driven equity projects that are currently available online incorporate varying degrees of scaffolding to assist users in drawing equity-related conclusions from the data. We provide an example from our project diversitydatakids.org in Section IV using the Child Opportunity Index. Another recently

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[3] COI is available for every census tract in the 100 largest U.S. metro areas (based on 2010 population).
[4] See, for example, World Health Organization. (2013). Handbook on health inequality monitoring with a special focus on low- and middle-income countries, Geneva, WHO.

launched data project, the National Equity Atlas (created by PolicyLink and the Program for Environmental and Regional Equity (PERE) at USC), also provides scaffolding by summarizing equity patterns in charts of summary measures and also in narrative statements with interpretations of the data. HUD's proposed tool focuses on summary indicators (#1 above) and encourages jurisdictions to find corrective actions (#4 above) by asking them to identify segregation determinants. However, the Tool does not make steps #2 and #3 explicit, which would guide jurisdictions to interpret data from an equity perspective. Based on conversations with colleagues, we understand that other projects and organizations are submitting comments to HUD regarding jurisdictions' accountability for using data findings to implement corrective actions. We fully support these efforts, but limit our feedback to enhancing steps #2 and #3: creating equity measures and incorporating them into summary and interpretive narrative statements.

Jurisdictions should be encouraged to examine and interpret data using their knowledge of local conditions. Since local conditions vary (sometimes greatly) across jurisdictions, we recognize that the Tool must remain sufficiently open-ended to capture rich, relevant details in a local context. However, providing a template for distilling and interpreting the data from an equity/fair housing perspective would facilitate tracking data across jurisdictions and over time, as well as provide additional guidance to jurisdictions with less capacity for data analysis.

For example, in Section D: "Disparities in Access to Community Assets and Exposure to Adverse Community Factors," the AFFH Tool asks jurisdictions to present data by protected class in tabular form and to explain which groups disproportionately experience access to certain community assets and adverse community factors. Table 14 could be enhanced by adding two additional columns for each exposure index; one showing the absolute difference in the value of the exposure index between the white (reference) group and the minority group of interest (Equity Measure 1), and a second column showing the ratio of the white group index to the minority group index (Equity Measure 2). See revised table below.

Additionally, Table 14 could be enhanced by providing example measures to compare outcomes between the total population and the poor population by race/ethnicity. These additional comparisons are important because it is often assumed that segregation arises primarily from differences in socioeconomic status between the white population and racial/ethnic minorities, specifically blacks and Hispanics. Therefore, racial/ethnic comparisons that adjust for socioeconomic status help highlight the independent role of race/ethnicity in segregation, which is critical for informing corrective action. We provide three examples of racial/ethnic comparisons adjusting for poverty status:

(1) Difference/ratio in exposure to poverty between the total and the poor population for each racial/ethnic group.

(2) Total population to poor population difference in differences in exposure to poverty between whites and racial/ethnic minorities.

(3) Total population to poor population ratio of ratios in exposure to poverty between whites and racial/ethnic minorities (see rows highlighted in green in Table 14 below).

Note: We provide equity measures and sample narrative comparisons for only one of the exposure indices (poverty), and simplify by showing just comparisons between white and black, but a similar approach could be used for the other exposure indices, and would be applied for comparisons between whites and each other racial/ethnic group (i.e. Hispanic, Asian/Pacific Islander, Native American, etc.). Also, we only show the table for the jurisdiction, but this table would be repeated for the Region, and the results of the two would be used to formulate summary narrative statements (see below).

Jurisdiction X	Poverty exposure index (PEI)	Equity measure 1: Difference of White to racial/ethnic minority group exposure to poverty	Equity measure 2: Ratio of White to racial/ethnic minority group poverty exposure ratio
Total population			
White	PEI_{w_all}	Reference group	Reference group
Black	PEI_{b_all}	Exposure index for blacks minus exposure index whites ($PEI_{w\_all} - PEI_{b\_all}$)	Exposure index for blacks divided by exposure index whites ($PEI_{w\_all} / PEI_{b\_all}$)
Poor population			
White	PEI_{w_poor}	Reference group	Reference group
Black	PEI_{b_poor}	Exposure index for poor blacks minus exposure index for poor whites ($PEI_{w\_poor} - PEI_{b\_poor}$)	Exposure index for poor blacks divided by exposure index poor whites ($PEI_{w\_poor} / PEI_{b\_poor}$)
Comparison between total and poor population	**Difference of total population exposure to poverty to poor population exposure to poverty (corresponding ratio)**	**Difference of racial/ethnic difference for total population to racial/ethnic difference for poor population**	**Ratio of racial/ethnic ratio for total population to racial/ethnic ratio for poor population**
White	$PEI_{w\_poor} - PEI_{w\_all}$ and $PEI_{w\_poor} / PEI_{w\_all}$	Reference group	Reference group
Black	$PEI_{b\_poor} - PEI_{b\_all}$ and $PEI_{b\_poor} / PEI_{b\_all}$	$(PEI_{b\_poor} - PEI_{b\_all}) - (PEI_{w\_poor} - PEI_{w\_all})$	$\dfrac{PEI_{w\_poor} / PEI_{w\_all}}{PEI_{b\_poor} / PEI_{b\_all}}$

[REPEAT THIS TABLE FOR REGION, COMPARE RESULTS OF JURISDICTION AND REGION]

In addition to providing equity measures, such as differences and ratios which answer the important question, "compared to what?" the Tool could also provide a template of sample narrative statements that help interpret and convey those equity measures. Listed below are narrative statement examples associated with the equity measures presented in enhanced Table 14 above:

Sample narrative statements:
NOTE: **Instructions could ask jurisdictions to provide narrative statements summarizing the main patterns in the data, for example:**

1. **Absolute exposures**
   a. **Within jurisdiction**
      Group X has the highest exposure to neighborhood poverty in this jurisdiction. Group Y has the lowest exposure to neighborhood poverty.
   b. **Within region**
      Group X has the highest exposure to neighborhood poverty in this region. Group Y has the lowest exposure to neighborhood poverty. This pattern is the same (different) than in the jurisdiction.

2. **Absolute differences**
   a. **Within jurisdiction**
      i. **Absolute differences between racial/ethnic groups:**
      The average black household in this jurisdiction lives in a neighborhood with a poverty rate (xx) points higher than the poverty rate in the neighborhood of the average white household.
      (Note: Provide similar statements comparing other racial/ethnic groups to whites.)
      ii. **Absolute differences between racial/ethnic groups adjusting for poverty status**
      (Note: Difference of total population's exposure to poverty to poor population's exposure to poverty):

      The average white household in this jurisdiction lives in a neighborhood with a poverty rate (xx) points higher than the poverty rate in the neighborhood of the average poor white household.

      (Note: Provide similar statements for the other racial/ethnic groups.)

      The average poor black household in this jurisdiction lives in a neighborhood with a poverty rate (xx) points higher than the poverty rate in the neighborhood of the average poor white household.

(Note: Also use Equity measure 2: <u>Ratio</u> of White to Racial/ethnic minority group poverty exposure ratio)

(Sample concluding statement):
This suggests that the inequity in neighborhood exposure to poverty between black and white households is (only partly) explained by differences in poverty status at the household level.

(Note: Use difference of racial/ethnic difference for <u>total</u> population to racial/ethnic difference for <u>poor</u> population):

The difference in neighborhood poverty exposure between black and white households in the total population is (xx) points higher/lower than the corresponding difference in neighborhood poverty exposure between black and white households in the <u>poor</u> population. (Repeat for comparisons between whites and other racial/ethnic groups.)

(Sample concluding statement):
This suggests that the inequity in neighborhood exposure to poverty between black and white households is (only partly) explained by differences in poverty status at the household level.

(Note: Provide similar statements comparing whites and the other racial/ethnic groups.)

    b. **_Comparison between jurisdiction and region_**

(Note: Jurisdiction should comment on whether racial/ethnic differences in exposure to poverty in the jurisdiction are generally lower (higher) than in the region using corresponding measures for the jurisdiction and region from Table 14.) (Note: This may be due to more racial/ethnic homogeneity in the jurisdiction).

3. <u>Ratios</u>
(Note: This section would be similar to measures/statements above for differences but will use ratio measures. Jurisdictions could decide whether to display inequities using differences in absolute values or ratios. HUD could provide TA (e.g., webinars) to explain the difference between these two types of measures.)

III. Geographic Benchmarks

A key issue in monitoring progress towards equity/fair housing is to select adequate benchmarks. The current proposed tool asks jurisdictions to draw comparisons between themselves and their region, but does not define the region—that is left to the jurisdictions. Defining the relevant comparative region is essential as using different regional benchmarks may lead to different conclusions about segregation and equity. For example, in small, relatively racially homogenous jurisdictions, dissimilarity indices may be small (and often reflect significant measurement bias—see Section V.3 below). Based on such indices, a jurisdiction may conclude that segregation is low. This conclusion would be correct if the referent is the jurisdiction itself. However, many parts of the Northeast, for example, are fragmented into small municipalities and segregation happens largely across municipal jurisdictions. Thus, a comparison with the metropolitan area or a portion of the metropolitan area is likely more relevant for highlighting patterns of segregation and inequity in access to neighborhood opportunity than an intra-jurisdictional analysis.

The Tool should explicitly direct jurisdictions to compare themselves with their metropolitan area (or a sensible alternative geography, perhaps the county, for jurisdictions in non-metropolitan areas). This comparison is justifiable not only because residential segregation and neighborhood inequality operate across metropolitan regions, but also because HUD uses metropolitan areas for defining Fair Market Rents. However, jurisdictions should be encouraged to present comparisons with other jurisdictions that constitute a regional grouping for planning purposes.

The Tool should provide guidance on the following intra- and cross-jurisdictional comparisons:

- **Within-jurisdiction inequity** between subgroups within a jurisdiction, based on disaggregated data and summary measures of inequity.
- **Cross-jurisdiction variation in inequity**, for example, where the jurisdiction stands (e.g., rank) in relation to other jurisdictions in the region.
- **Cross-jurisdiction comparisons of within-jurisdiction inequity**, for example, extent of racial/inequity in neighborhood exposure to poverty.

Note: See Section I. "Scaffolding an equity assessment; Sample narrative statements" above for examples of these comparisons.

HUD should also provide guidance on indicators that capture differences between jurisdictions and their regions, for example:
- Jurisdiction-region dissimilarity (modelled after Frey's city-suburban dissimilarity index (Frey 1994)) for racial/ethnic composition for the total population and for families with children.

- Jurisdiction-region dissimilarity (modelled after Frey's city-suburban dissimilarity index (Frey 1994)) for availability of affordable housing.

IV. Data by Multiple Dimensions

The AFFH Tool provides demographic data and other characteristics along only one dimension at a time. For example, Table 1 provides data on the number/percent of the population in each racial/ethnic group and on the number/percent of families with children, but it does not provide data on the intersection of these important dimensions, i.e. what is the racial/ethnic composition of families with children. For major dimensions of interest, for example race/ethnicity and poverty status, providing counts and percentages across two or more dimensions will facilitate more accurate equity comparisons. For example, due to differences in age structure and childbearing, the percent of families that have children is likely to differ substantially between Hispanic and non-Hispanic white families. Nationally, according to the 2010 Decennial Census, 69% of Hispanic families were families with (related) children, compared to just 43% of non-Hispanic white families. These differences may become even more apparent when disaggregated further by income level/poverty status. Although it is important not to overwhelm jurisdictions with too much data disaggregation, providing multidimensional data in certain cases is often critical to understanding equity differences and for crafting possible solutions.

V. Child Opportunity Index

We commend HUD for inclusion of the "Disparities in Access to Community Assets and Exposure to Adverse Community Factors" section of the AFFH Tool, the provision of local-level data and maps covering a range of neighborhood assets and stressors, and for facilitating explicit mapping of the location of children by race/ethnicity. As researchers specializing in the relationship between children's neighborhoods and their wellbeing, we know neighborhoods are central to determining the combination of supports, resources, and stressors forming the locally-based "ecosystem" in which children develop (i.e. where a child goes to school, receives child care and early education, plays, and forms social networks). It follows that a rigorous assessment of fair housing from the perspective of children and families and racial/ethnic equity asks jurisdictions to determine: 1) the extent to which sufficient neighborhood-based opportunities for healthy child development are present in the places where children live, and 2) the degree of equity/inequity in the distribution of those opportunities across racial/ethnic groups.

While the draft AFFH Tool is a significant step forward in addressing these issues, we believe that many jurisdictions[5] would greatly benefit from utilizing the newly-developed diversitydatakids.org-Kirwan Institute Child Neighborhood Opportunity Index (hereafter "COI"), a data and mapping tool specifically designed to assess racial/ethnic equity in access to neighborhood-based opportunities for children. The COI offers a widely available peer-reviewed data source[6] for all census tracts in the 100 largest U.S.

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[5] COI is available for every census tract in the 100 largest U.S. metro areas (based on 2010 population).
[6] Acevedo-Garcia, D., McArdle, N., Hardy, E. F., Crisan, U. I., Romano, B., Norris, D. & Reece, J. (2014). The Child Opportunity Index: Improving Collaboration Between Community Development And Public Health. *Health Affairs*, 33(11), 1948-1957.

metro areas, in a non-technical, web-based format, allowing users to map the distribution of neighborhood opportunity for children and to overlay the child population by race/ethnicity onto this geography of opportunity. The COI would be particularly helpful to jurisdictions performing child/family-focused equity analyses in addressing three questions posed in the AFFH Tool:

1. "Identify and discuss any overarching patterns of access to assets and exposure to adverse community factors based on race/ethnicity, national origin and familial status. For example, identify neighborhoods that experience an aggregate of poor access to assets and high exposure to adverse factors."[7]

2. "Provide additional relevant information, if any, about segregation and R/ECAPs in the Jurisdiction and Region (e.g. information regarding LEP persons, color, religion, and families with children)[8]."

3. "Provide additional relevant information, if any, about disparities in access to community assets and services and exposure to adverse community factors (e.g., addressing religion, color, LEP, familial status)." [9]

Recommendation: We recommend that the instructions for the AFFHAFFH Tool direct jurisdictions to the COI and related web-based analysis tools (http://www.diversitydatakids.org/data/childopportunitymap) as an optional tool (that complements the HUD-provided data and bolsters local knowledge) for responding to the three directives above.

In direct response to point 1 above, regarding "overarching patterns of access to assets and exposure to adverse community factors based on race/ethnicity, national origin and familial status," the COI offers a single "cumulative" measure of multiple neighborhood-level factors that, combined, have a compounding influence on children. While individual indicators of community assets are needed to analyze a specific neighborhood dimension, a multi-item index offers a picture of the combined contributions of positive factors (like access to high-quality early childhood education) and negative factors (such as poverty or a lack of healthy food choices).

The COI is an aggregate of 19 individual indicators organized into three domains: Educational Opportunities, Health and Environmental Opportunities, and Social and Economic Opportunities. All of the COI indicators have been vetted for their relevance to child development based on empirical literature on neighborhood effects, conceptual frameworks of neighborhood influences on children, or both. Importantly, the COI includes specifically collected and developed indicators (available nowhere else) that are crucial for assessing the presence of developmentally-relevant neighborhood opportunities and in particular, for assessing the presence of local resources that play a crucial role in

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[7] Section IV (Analysis), Section D (Disparities in Access to Community Assets and Exposure to Adverse Community Factors), Subsection 3.

[8] [8] Section IV (Analysis), Section B (Segregation/Integration and R/ECAPs), Subsection 2 (Geographic Analysis)

[9] Section IV (Analysis), Section D (Disparities in Access to Community Assets and Exposure to Adverse Community Factors), Subsection 4.

reducing racial/ethnic inequities. For example, the COI contains novel measures of the presence of quality early childhood education centers—a locally-based support that research shows may play an important role in narrowing the long-standing educational achievement gaps that form in the years before school entry. The overall COI and three domain sub-indices are summarized in both map and table format by categorizing census tracts into quintiles (very low opportunity, low, moderate, high, very high opportunity), based on their position in the distribution of neighborhood child opportunity across the relevant metropolitan statistical area. (See Exhibit 1 below for a sample COI map showing the distribution of neighborhood child opportunity for metropolitan Boston-Cambridge-Quincy, MA-NH.)

Jurisdictions can perform analyses using the overall aggregate COI and/or using each of the three component sub-indices. Furthermore, jurisdictions can download tract-level data for each of 19 individual indicators normalized to the relevant metropolitan area, allowing for more in-depth exploration of particular neighborhoods' specific characteristics relative to the metropolitan area. For more information on the COI methodology, please refer to COI Technical Documentation (available at: http://www.diversitydatakids.org/files/CHILDOI/DOCS/DDK_KIRWAN_CHILDOI_OVERVIEW.pdf).

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Exhibit 1. Distribution of Neighborhood-based Opportunities for Children
diversitydatakids.org-Kirwan Institute Child Opportunity Index Map
Boston Metropolitan Area
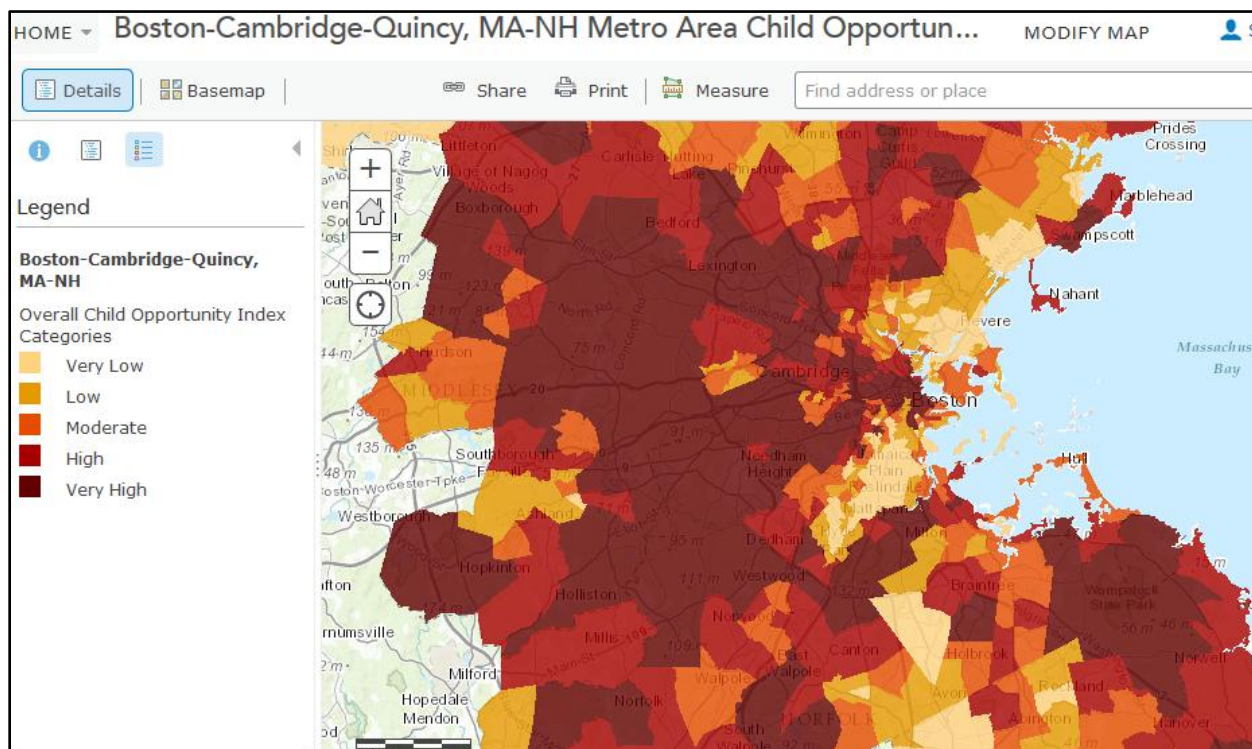
Secondly, we believe the COI offers an important tool in addressing these directives:

- **"Provide additional relevant information, if any, about segregation and R/ECAPs in the Jurisdiction and Region (e.g. information regarding LEP persons, color, religion, and families with children)[10]."**

- **"Provide additional relevant information, if any, about disparities in access to community assets and services and exposure to adverse community factors (e.g., addressing religion, color, LEP, familial status)"[11].**

From a child/family-focused equity perspective, it is important to understand not only patterns of racial segregation, but also whether and how patterns of racial/ethnic segregation may occur (or not) in differences in the neighborhood conditions that matter for children/families. The COI, by design, supports this type of analysis in that it is a race neutral index, i.e. no indicators of race/ethnicity are

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[10] Section IV (Analysis), Section B (Segregation/Integration and R/ECAPs), Subsection 2 (Geographic Analysis)
[11] Section IV (Analysis), Section D (Disparities in Access to Community Assets and Exposure to Adverse Community Factors), Subsection 4.

included in the index. Instead, the index is meant to identify and measure the presence of neighborhood resources and conditions and then allow jurisdictions to overlay the child population by race/ethnicity to examine the relative presence of those neighborhood resources and conditions for children/families of varying racial/ethnic groups. Jurisdictions can explore and display the distribution of children across neighborhood opportunity categories using interactive maps, allowing users to change the race/ethnicity of the child population displayed, (see Exhibit 2 below for a sample COI map showing the distribution of the black child population overlaid on neighborhood opportunity for metropolitan Boston-Cambridge-Quincy, MA-NH,) or they can compute and compare the percentages of children, in each racial/ethnic group, that live in one of five neighborhood opportunity levels (ranging from "very low" to "very high"). This type of analysis goes beyond explaining children's neighborhood environments in terms of racial/ethnic segregation and poverty concentration (which would be the focus of an analysis of children's concentration in R/ECAPs as described in point 2 above), to examining children's access to specific local opportunities that support healthy development, and how that access may vary for children of varying racial/ethnic groups.

***Exhibit 2. Distribution of Black Child Population Overlaid on Child Opportunity Index Map
Boston Metropolitan Area***
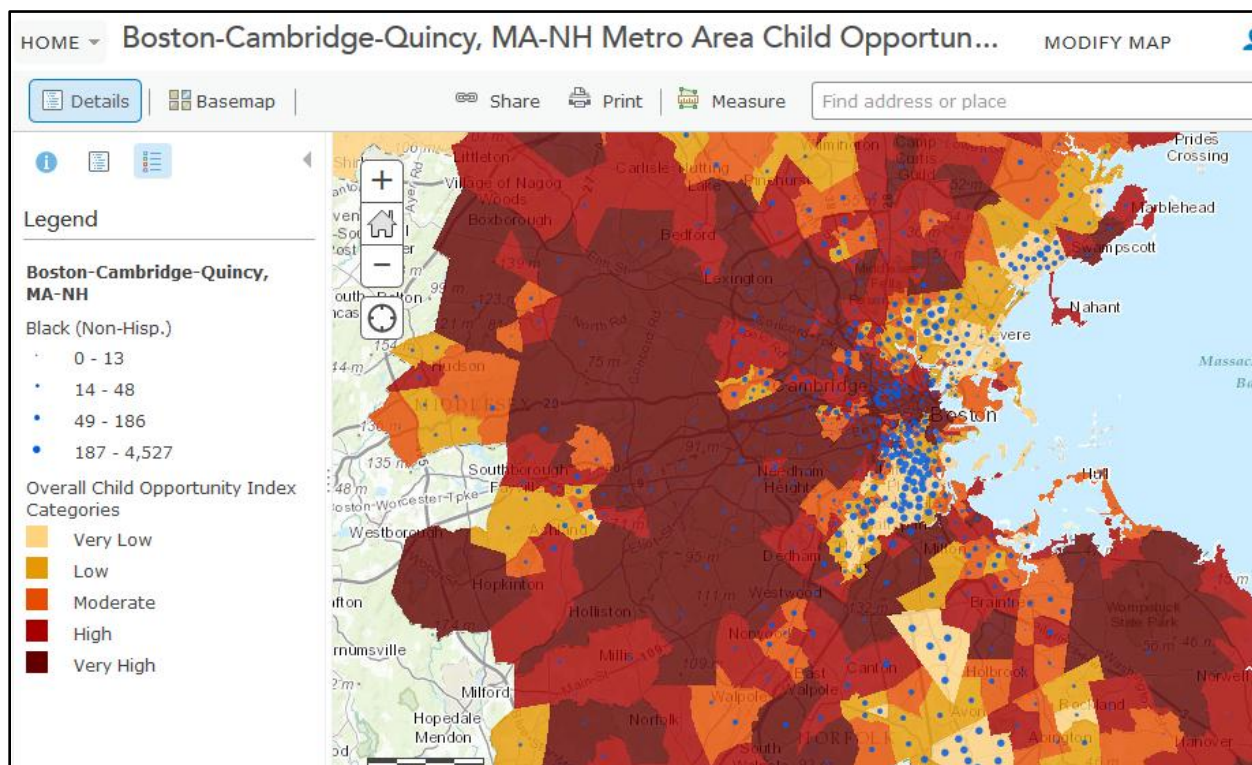
Analysis of neighborhood opportunity serves as an important complement to analysis of concentration of families with children in R/ECAPs (as proposed in point 2 listed above). In practice, many jurisdictions will have relatively small shares of children living in R/ECAPs (often because a jurisdiction has few, if any,

neighborhoods that meet R/ECAPs thresholds). While many jurisdictions will conclude from the data that there are low concentrations of children in R/ECAPs, this is not sufficient to conclude that racial/ethnic segregation is not having a detrimental effect on the wellbeing of children/families. For example, in the Boston Metropolitan Region,[12] a regional analysis of fair housing conducted by the Massachusetts Area Planning Council found that 14% of black children and 16% of Hispanic children lived in R/ECAPs, compared to 1% of white children. Authors' analysis of COI Metro Boston data suggest that 58% of black children and 58% of Hispanic child live in "very low-opportunity" census tracts, as defined by the COI, compared to 9% of white children. Through this comparison, we are not suggesting any equivalency between the definition of R/ECAPs and "very low-opportunity" neighborhoods, instead, we are illustrating how different measures of children's neighborhood environments provide two distinct and complementary pieces of information that are integral to understanding the connection between issues of fair housing, child/family wellbeing and racial/ethnic equity.

In sum, by providing neighborhood opportunity mapping and data tools that incorporate factors most relevant to child wellbeing, the COI offers a valuable resource to jurisdictions seeking to enhance local knowledge of how to affirmatively further fair housing of families with children and to address issues of racial/ethnic equity. By directing jurisdictions to the COI, where appropriate (either directly in the AFFH Tool or in the instructions for using the AFFH Tool, for example), HUD can further expand the already considerable toolkit of resources available in the new AFFH Tool.

VI. Other comments on specific portions of the AFFH Tool
1. Section IV: Analysis, Subsection B: Segregation/Integration and R/ECAPs,
Paragraph 6. Publicly Supported Housing Patterns
Although paragraph 5 "Determinants of Segregation/R/ECAPs" lists a series of factors that may contribute to segregated housing patterns or R/ECAPs, a similar list should be provided addressing determinants of segregation for publicly supported housing. Jurisdictions should be asked specifically about the segregative influences of the following factors:

- Land use and zoning laws, such as minimum lot sizes, limits on multi-unit properties, height limits, or bedroom-number limits as well as requirements for special use permits.
- Siting decisions for Public Housing. For example, compare the demographic characteristics of the census tracts where public housing has been constructed over the past five years with the demographic characteristics of the jurisdiction as a whole.
- Siting decisions for LIHTC housing, including discretionary incentives in the relevant Qualified Allocation Plan governing LIHTC distribution. For example, compare the demographic characteristics of the census tracts where LIHTC housing has been constructed/located over the past five years with the demographic characteristics of the jurisdiction as a whole.

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[12] Metropolitan Boston Region defined using a Boston Metropolitan Planning Organization area definition used for transportation modeling which is based on a 164-municipality region, and which varies from the U.S. Census definition Boston-Cambridge-Quincy MSA definition.

- Siting decisions for other publicly-supported housing.
- Admission or residency preferences for public housing or other publicly-supported housing.
- Community resistance to building publicly-supported housing in particular areas.
- Regional collaboration or the lack of regional collaboration.

2. Section IV: Analysis, Subsection A. Demographic Summary, For Tables 1 and 2:
In the sample data for provided Tables 1 and 2, the race/ethnicity composition percentages do not add up to 100% (they sum to 98.2%), and they do not correspond with the "count" data (assuming that all race/ethnicity groups are shown). For example, if all groups are shown in the counts, the white group should be 61.1% of the total, not 60%. Does this just represent a typographical error? How are multi-racial groups counted (they are not listed)?

3. Section IV: Analysis, Subsection A. Demographic Summary, Tables 1:
The note to Table 1 states: "All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families."
A percentage figure should also be provided which shows families with children as a percent of all households, not only as a percent of families. Families with children could represent a very large share of all families but still a relatively small share of all households (occupied housing units) in a jurisdiction.

4. Section IV: Analysis, Subsection B: Segregation/Integration and R/ECAPs, Tables 3 and 4:
Both measures of dissimilarity and exposure (if exposure is added as a measure, as we and other respondents recommend), will be measured with bias (sometimes significant) under certain circumstances, for instance when there are a small number of "minority" residents in a jurisdiction of interest or when the ratio of "minority"-to-majority residents is very low. Researchers often deal with this by either suppressing data or including strong cautions, such as the following from Brown University's US2010 website:

- *"We have calculated data for all cities with more than 10,000 population in 2010. Note that some indices become unreliable or have little meaning for very small places, or where a specific racial/ethnic group is very small. Therefore, you should be cautious in using these data, especially for cities with populations less than 50,000."*

Implementing thresholds such as these likely eliminates the most extreme outliers, but does not completely solve the bias problem and restricts the number of jurisdictions for which data can be shown. Some researchers, such as Mark Fossett at Texas A&M, have developed unbiased measures of dissimilarity and exposure—see here. The diversitydatakids.org project uses Fossett's unbiased measures in certain exposure calculations and to detect bias and guide data suppression decisions for dissimilarity measures for indicator reporting on diversitydatakids.org. For example, see here. Providing jurisdictions with the traditional dissimilarity and exposure indices in areas where they are likely to be

biased will produce misleading results, especially for time-trend data when looking at jurisdictions where the size of racial/ethnic population groups are changing rapidly.

5. Section IV: Analysis, Subsection B: Segregation/Integration and R/ECAPs, question j and Table 6:

To address question j: "Which groups are disproportionately represented in R/ECAPs compared to the Jurisdiction and Region?" Table 6 is provided. This table only shows the racial composition of the R/ECAP areas within the jurisdiction and region (e.g. "the R/ECAP area is 20% black"). While this statistic is useful, it would be preferable to also show the share of each race/ethnic group within the jurisdiction that lives in a RECAP area (e.g. 70% of the black population lives in R/ECAPS, compared to 2% of the white population).

6. Section IV: Analysis, Subsection B: Segregation/Integration and R/ECAPs,
Paragraph 6. Publicly Supported Housing Patterns, b. Publicly Supported Housing Location and Occupancy:
The data provided to answer the following question is insufficient since it is only provided for public housing overall:

> i. Describe patterns in the siting of the categories of housing presented above. Describe in particular any differences in siting patterns for housing that serves families, elderly, or individuals with disabilities. For example, are all or most family housing developments or housing developments for persons with disabilities located in R/ECAPs or neighborhoods predominately occupied by persons of a specific race or ethnicity?

Data are provided for public housing overall, but public housing for the elderly is often located in different locations than public housing for families (and serves different populations). Therefore, data should be provided separately for family and elderly public housing.

7. Section IV: Analysis, Subsection B: Segregation/Integration and R/ECAPs, Paragraph 2 Geographic Analysis
Throughout the Tool there are many instances where jurisdictions are provided with a dot density map and then asked to address questions such as the following:

> *Identify and describe neighborhoods or areas where either segregation or integration by race/ethnicity has significantly changed over time.*

While dot density maps are helpful as visual representations of racial concentration and separation, it will be difficult for jurisdictions to articulate their response to questions about segregation/integration based purely on the maps (e.g. "There were few red dots in location X in 2000 but many in 2010").

It would be preferable if jurisdictions also had access to racial/ethnic population counts and percentages for tracts/neighborhoods as well as for the jurisdiction as a whole, allowing them to make statements such as, "In neighborhood X, the black population is three times that of the city as a whole, and the white population is a third that of the jurisdiction" or, "In these 12 tracts, the Hispanic population is ten times that of the jurisdiction as a whole" or, "Over the decade, in tract X, the Hispanic population grew from 1% of the tract to 50%, while in the jurisdiction overall it remained constant."

VII. Team qualifications
diversitydata projects
The diversitydata projects establish the first population-level, racial/ethnic equity-focused information system to monitor the state of wellbeing, diversity and opportunity in the U.S. Our goal is to provide a research-based, data-driven accountability tool to track progress towards the two aims of better results for all and greater racial/ethnic equity as the U.S. becomes an increasingly diverse society.

The diversitydata projects examine not only outcomes such as health and educational outcomes but also the structural determinants of these outcomes. Our data cover health and broad social determinants of health such as education, employment, neighborhoods, and social policy.

Our team has expertise in research on residential and school segregation, as well as significant experience in the fair housing field. We have conducted rigorous quantitative analyses to support housing discrimination and disparate impact cases, participated as members and co-chairs in fair housing advocacy in Boston (Fair Housing Center of Greater Boston; Advisory Committee on the Analysis of Impediments to Fair Housing Choice in Boston (City of Boston, Office of Civil Rights); Advisory Committee to the Boston Metropolitan Area Planning Council's Equity Report Card) and nationally (Social Science Advisory Board of the Poverty and Race Research Action Council). Our professional activities related to fair housing include invited testimony to the National Commission on Fair Housing and Equal Opportunity led by former HUD Secretaries Cisneros and Kemp, a briefing for the Congressional Black Caucus on housing policy as a tool to tackle health disparities, a convening with HUD Secretary Shaun Donovan on the Section 8 Housing Voucher program, and a presentation at the White House Conference on the Future of Rental Housing Policy.

diversitydata projects team members (contributing to this memorandum):
Dolores Acevedo-Garcia, PhD, MPA-URP
Samuel F. and Rose B. Gingold Professor of Human Development and Social Policy
Director, Institute for Child, Youth and Family Policy
The Heller School for Social Policy and Management
Brandeis University

Erin Hardy
Research Director, diversitydatakids.org

Fellow, Institute for Child, Youth and Family Policy
The Heller School for Social Policy and Management
Brandeis University

Nancy McArdle
Senior Research Analyst, diversitydata.org, diversitydatakids.org
Institute for Child, Youth and Family Policy
The Heller School for Social Policy and Management
Brandeis University

Unda Ioana Crisan
Research Associate, Institute for Child, Youth and Family Policy
The Heller School for Social Policy and Management
Brandeis University

Kirwan Institute for the Study of Race and Ethnicity
Under the leadership of John A. Powell, the Kirwan Institute has become a national leader in conducting opportunity mapping to support social and racial justice initiatives. The Institute has completed opportunity mapping in more than a dozen metropolitan areas across the U.S. since 2003, often at the request of community groups and advocacy organizations interested in community development and fair housing.

Kirwan Institute team members (collaborating with the diversitydata projects on the COI):

Jason Reece
Director of Research
Kirwan Institute for the Study of Race and Ethnicity
The Ohio State University

David Norris
Senior Researcher
Kirwan Institute for the Study of Race and Ethnicity
The Ohio State University

Mikyung Baek
Research and Technical Associate
Kirwan Institute for the Study of Race and Ethnicity
The Ohio State University

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