

NORTH TEXAS REGIONAL HOUSING ASSESSMENT

City of Frisco

October 2018

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II. Executive Summary

The North Texas Regional Housing Assessment (NTRHA) was created in 2016 as a consortium of 20 Dallas-Fort Worth (DFW) cities and housing authorities to respond to the U.S. Department of Housing and Urban Development's (HUD) requirement to complete an Assessment of Fair Housing (AFH). NTRHA contracted with researchers representing the Department of Civil Engineering and the College of Architecture, Planning and Public Affairs at the University of Texas at Arlington to complete the assessment on behalf of consortium members using HUD-provided data and analytical tools supplemented by locally generated data for Frisco. Results are discussed in the following sections:

- **Community participation** – NTRHA gathered information from the public, stakeholders and subject matter experts through public meetings, focus groups, consultations and surveys. Input was collected from hundreds of community members.
- **Assessment of past goals and accomplishments** – Frisco Housing Authority and the City of Frisco have made progress toward affirmatively furthering fair housing by providing supportive services and continuing to provide excellent public housing management. Further work is necessary to accomplish long-term objectives.
- **Fair housing analysis** – Researchers studied census data, stakeholder and expert knowledge, and national, state and local information sources to create an informed picture of fair housing conditions in Frisco. Study areas included racial and ethnic segregation, concentrations of poverty, housing problems for persons with disabilities, limited English proficiency, families with children, seniors and other protected classes to identify fair housing issues and barriers to access to opportunity.
- **Fair housing goals and priorities** – Researchers and leaders from the City of Frisco and Frisco Housing Authority identified priorities for action among fair housing issues identified through the research process and set long-range goals that addressed these issues.

Five fair housing issues emerged from analysis of local and regional data as well as input from expert sources:

- **Segregation** – Residential segregation has grown worse in the region since 1990, with a clear divide in the composition of rural and urban areas. During this time, Frisco's landscape has changed dramatically.
- **Concentration of poverty** – Segregation has contributed to the emergence of an urban landscape that includes several neighborhoods with relatively high poverty rates.
- **Location of publicly supported housing** – Housing choice vouchers tend to be utilized in the same urban neighborhoods suffering the effects of increased segregation. This serves to exacerbate the trend.
- **Housing cost** – Home prices, apartment rents and property taxes continue to rise rapidly and exceed the capacity of many residents to afford housing, especially households with income at or below 30% of the area median income, persons with disabilities, persons living on fixed incomes and single-parent families with small children.
- **Access to employment** – Lower income residents have limited access to affordable housing in proximity to good jobs with better wages. The lack of affordable transit options worsens this problem.

Participants emphasized five additional issues in public engagement activities:

- **Discrimination** – Most landlords will not accept renters paying with housing subsidies. Community opposition to the spread of affordable housing throughout Frisco continues.
- **Lack of investment** – The tendency to overlook certain neighborhoods and services serves to exacerbate existing segregation and leave some people behind. Failure to invest in the economic well-being of struggling residents leads to a lack of access to opportunity.
- **Lack of affordable housing** – Rising housing costs and limited access to housing assistance make it increasingly difficult for support and service workers, low-income families and persons living on fixed incomes, including seniors and persons with disabilities, to find housing.
- **Lack of affordable transportation** – Affordable transportation options are not adequate to support participation in work, commercial and civic life, and recreation.
- **Lack of integrated, supported, affordable housing for persons with disabilities** – Most persons with disabilities find housing completely unaffordable, especially when compared with limited and fixed incomes.

Five goals were set to address these issues in Frisco:

- Meet the community needs of affordable housing for all range of income groups
- Increase supply of accessible, affordable housing for persons with disabilities
- Make investments to increase access to affordable transportation options for low-income households and persons with disabilities
- Increase support and services for residents with housing assistance
- Increase access to information and resources on fair and affordable housing

III. Community Participation Process

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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 North Texas Regional Housing Assessment (NTRHA) and its public participation strategies incorporated an evolving process, using a combination of methods to make sure that the community was as engaged in the process as possible. NTRHA used input gathered at each stage to shape later efforts and research. Figure 1 displays public participation strategies selected to meaningfully engage stakeholders in the AFH process, including the goals and target groups for each strategy.

Strategy	Goal	Target Groups
Public Meetings	Fulfill governmental requirements for transparency Convey HUD data in understandable ways to the public Provide opportunity for attendees to comment on information provided Gather community reaction to HUD data and local information about fair housing opportunities	All citizens interested in the subject Low-income community members Residents of publicly supported housing
Focus Groups – Demand Side	Gather local and site-specific information about housing experiences and needs, including: Disparate treatment in housing access Impediments to accessing affordable, quality housing Barriers to housing in high-opportunity areas Experiences with gaining access to high-quality education, affordable transportation, environmentally healthy communities Satisfaction with ability to access fair housing information Priorities for housing improvement	Consumers of publicly supported housing programs Residents of low-income communities Persons with disabilities Renters and owners Seniors Limited English proficiency groups

	Experiences with publicly supported housing programs, including positive and negative	
Focus Groups – Supply Side	<p>Gather local and jurisdiction-specific information about challenges of producing and supporting affordable housing, including:</p> <ul style="list-style-type: none"> Housing market conditions such as cost, availability, development, etc. Programs available to assist homeowners and renters Programs available to support developers (tax credits, etc.) Public housing authority operations, management, conditions, challenges Support services available for low-income housing residents to increase opportunity and access to affordable housing Strategies for increasing accessibility to affordable housing in high-opportunity areas and improving conditions in low-opportunity areas 	<ul style="list-style-type: none"> Housing authority staff and leadership Real estate professionals, associations Developers and owners/managers of rental housing properties Affordable housing providers Providers of housing services and supports for low-income residents
Consultations	<p>Gather local information on:</p> <ul style="list-style-type: none"> School systems and the impact of housing instability on education outcomes Environmental hazards affecting residents Transportation system capacity and gaps Other systemic barriers to affordable housing, including criminal background, bad credit, family size, disability Health outcomes and disparities based on location of residence 	<ul style="list-style-type: none"> School district staff, leadership, homelessness coordinators Planning managers of transit programs City and county staff and leaders Low-income housing advocates Advocates for special populations, including persons with disabilities, low-income community residents, minorities, women Low-income housing academic experts
Surveys	Gather information on housing and neighborhood priorities from community members	<ul style="list-style-type: none"> Public at large Consumers of publicly supported housing Special housing needs groups

Figure 1: Public participation goals, strategies and targets

Public participation efforts throughout the life of this project, particularly public meetings and focus groups, were conducted by independent facilitators who were members of the research team rather than individuals associated with the City of Frisco and Frisco Housing Authority. This

ensured that all community members would feel comfortable sharing firsthand experience and knowledge and could criticize agencies openly, if desired. Strategies were enacted on both a regional and local scale, where possible, in order to garner appropriate feedback. NTRHA is confident that an accurate account of housing realities is captured in this report.

Web Presence

Continuous public engagement began with the development of the NTRHA website (www.NorthTexasRHA.com) in mid-February 2017. Viewers may translate the site into more than 100 languages (including Spanish and Chinese). Information on the website was information-rich and presented in terms that are easily understood by the general population (non-experts in housing). The website was updated with times and locations of public meetings and focus groups throughout the project. Relevant presentations, videos and links were also posted so that the community was kept as up to date as possible. The website also contained links to HUD guidelines, media mentions and other relevant information.

A Facebook page was started early in the project (first post Feb. 10, 2017) where NTRHA shared media mentions of the AFH, links to the survey (discussed below), public meeting dates and photos of the NTRHA team engaging with the community. These tools proved useful for immediate updates and promoting public engagement in the project. The Facebook page garnered approximately 120 “likes” overall but achieved additional engagement through sharing and “liking” individual posts. NTRHA used social media in a supporting role to other methods of online outreach such as the website and email.

At each stage of the research process, the NTRHA online presence (website and social media) was updated. This included updates to the data, new surveys and other voting tools such as the draft goals poll initiated during the second round of public meetings. Participating jurisdictions and advocacy groups incorporated links to the NTRHA website and the NTRHA surveys on their websites. These organizations also promoted public meetings and focus groups. Other websites covered NTRHA in their ongoing blogs and news pages. Websites posting NTRHA information included:

- Deafnetwork.com – Housing focus groups for people with ALL Disabilities (DeafNetwork.com, 2017)
- University of Texas at Arlington – Aim of assessment study to foster collaboration (Booth, 2017)
- ICP – Getting your fair housing concerns heard – VRO Webinar (ICP: inclusive communities project, 2017)
- National Apartment Association – DFW Continues regional assessment (NAA: National Apartment Association, 2018)
- Community for Permanent Supported Housing - NTR Fair Housing Assessment Meetings (Community for Permanent Supported Housing, 2018)
- CPSH – Across DFW: Assessment of Fair Housing (CPSH, 2017)

Public Meetings

Location	Date	Time	Round	Attendees
The George A. Purefoy Municipal Center	Wednesday, June 21, 2017	7:00 PM to 9:00 PM	1	13
The George A. Purefoy Municipal Center	Wednesday, March 21, 2018	6:00 PM to 8:00 PM	2	27

Figure 2: Frisco meeting dates, times, round and number of attendees

Public meetings were conducted in two rounds. The first public meetings held in 2017 were designed to present HUD data and get community input on contributing factors to barriers to fair housing. The second round focused on better understanding what housing-related goals might be desirable for residents, including a discussion of possible strategies to generate improved conditions.

Meetings at Frisco during both rounds consisted of a short presentation followed by the opportunity for attendees to discuss maps and provide feedback. Meetings were facilitated by NTRHA staff with housing authority staff also available to address questions. (Presentation slides were also posted online and are included in the appendix.) Figure 2 displays the dates, times, round, sponsor and number of attendees at each meeting held at Frisco. Notices for both meetings were published in local journals in order to inform the public and generate attendance.

Dallas and Ellis County

Jurisdiction	County	Date	Time	Address
City of Irving	Dallas	June 02	7:00 PM	901 Senter Rd, Irving, Texas 75040 (Senter Park Recreation Center)
City of Garland & Garland Housing Authority	Dallas	July 11	7:00 PM	1701 Dairy Rd., Garland, Texas 75040 (Gale's Field Recreation Center)
Peels Housing Authority	Ellis/Dallas	August 09	7:00 PM	410 N Wood St, Peels, Texas 75125
Waxahachie Housing Authority	Ellis	August 01	7:00 PM	208 N Pollock St, Waxahachie, Texas 75145
Ennis Housing Authority	Ellis	August 10	7:00 PM	300 Arnold St, Ennis, Texas 75119

Denton and Collin County

Jurisdiction	County	Date	Time	Address
City of Denton & Denton Housing Authority #1	Denton	July 24	4:30 PM	1001 Franklin St., Denton, Texas 76205 (Denton Recreation Center)
City of Denton & Denton Housing Authority #2	Denton	August 07	4:30 PM	509 N. Bell Ave., Denton, Texas 76209 (Denton Senior Center)
City of Denton & Denton Housing Authority #3	Denton	August 10	7:00 PM	1300 Wilson St, Denton, Texas 76205 (MLK Jr. Recreation Center)
City of Frisco & Frisco Housing Authority	Denton/Collin	June 21	7:00 PM	4101 Frisco Square, Frisco, Texas 75034 (George A. Purefoy Municipal Center)
City of McKinney & McKinney Housing Authority	Collin	July 15	10:00 AM	1200 N. Tennessee St, McKinney, Texas 75069 (McKinney Community Center)
City of McKinney & McKinney Housing Authority	Collin	July 25	7:00 PM	1201 E. Louisiana St, McKinney, TX 75069 (Old Settler's Recreation Center, North Gym)
City of Plano & Plano Housing Authority	Collin	July 27	7:00 PM	1740 G Ave, Plano, Texas 75074 (Plano Housing Authority)

Tarrant County

Jurisdiction	Date	Time	Address
Fort Worth Housing Authority District 4	July 12	7:00 PM	4934 McPherson Blvd, Fort Worth, Texas 76123 (Chisholm Trail Community Center, Multi-Purpose)
Fort Worth Housing Authority District 5	July 20	7:00 PM	5545 Truman Dr, Fort Worth, Texas 76112 (MLK Community Center, Community Room)
Fort Worth Housing Authority District 8	July 31	7:00 PM	951 Evans Ave, Fort Worth, Texas 76104 (Bethlehem Center)
Fort Worth Housing Authority District 4	August 01	7:00 PM	9100 N. Beach St, Fort Worth, Texas 76264 (North Park YMCA, Multi-purpose Room)
Fort Worth Housing Authority District 9	August 03	7:00 PM	3551 New York Ave, Fort Worth, Texas 76110 (North Heights Community Center, Activity Room 4)
Fort Worth Housing Authority District 7	August 07	7:00 PM	1330 Eagle Blvd, Haslet, Texas 76052 (Eaton High School (Northwest SD), Student Union)
Fort Worth Housing Authority District 7	August 08	7:00 PM	3500 Camp Bowie Blvd, Fort Worth, Texas 76107 (UNT Health Science Center, Room 109-1011)
Fort Worth Housing Authority District 2	August 10	7:00 PM	1100 NW 18th St, Fort Worth, Texas 76164 (Northside Community Center, Senior Facility Room)
Fort Worth Housing Authority District 3	August 14	7:00 PM	4900 Home St, Fort Worth, Texas 76107 (Corno Community Center, Kids Club Room)

Johnson and Hunt County

Jurisdiction	County	Date	Time	Address
Cleburne Housing Authority	Johnson	July 24	7:00 PM	1302 W. Henderson, Cleburne (Cleburne Conference Center)
Grandview Housing Authority	Johnson	July 27	7:00 PM	303 N 3rd St, Grandview, TX, 76050
Greenville Housing Authority	Hunt	June 28	7:00 PM	4912 Lee St, Greenville, TX 75401 (United Way)

Figure 3: Public meeting flyer

Focus Groups

Focus groups were used to gather information on targeted aspects of the AFH. One focus group was held within Frisco on June 21, 2017, with 13 attendees, while many others were held throughout the region in order to garner feedback on a litany of topics relevant throughout the Dallas-Fort Worth Metroplex. Focus groups were designed and facilitated by NTRHA staff. Each focus group was targeted toward a group of stakeholders sharing common interests in fair housing. The format and questions for each focus group were customized to effectively address the interests and needs of the participants and were conducted in centrally located, accessible facilities, including churches, colleges, recreation centers and other public facilities.

Consultations and information gathering

Consultations (interviews, meetings, tours) were conducted with key informants and subject matter experts to strengthen the understanding of the realities of barriers to housing in the jurisdiction and to identify best practices. NTRHA researchers attended public and private meetings and events in various parts of the region and state related to fair housing issues, including housing affordability, race and culture, neighborhood revitalization, transportation and economic development. Figure 5 (part two of this section) lists the organizations consulted relevant to matters within Collin and Denton counties, including attendees and topics discussed. Meetings with members of the organizations listed explored different aspects of access to housing and opportunity, including public policy, research, race, gender, homelessness, civil rights, transportation, economic development, neighborhood revitalization, insurance, residential real estate property development and planning.

Technical Advisory Board

The NTRHA research team also established a technical advisory board that met twice during the project. The first meeting was held June 28, 2017, to present the project study plan and get input from the board on important issues to address throughout the study. The second meeting was June 8, 2018, to discuss the draft goals and strategies developed by each jurisdiction and get feedback. Figure 4 lists the organizations and their representatives participating in the technical advisory board. The technical advisory board includes representatives of advocacy organizations for protected groups and related industries. Technical advisory board members also attended other public engagement events and participated in consultations.

NTRHA Technical Advisory Board	
Organization	Representative
Coalition of Texans with Disabilities	Dennis Borel, Executive Director
Dallas Women's Foundation	Dena Jackson, Director, Research and Programs
Federal Reserve Bank	Roy Lopez, Community Development Officer
Habitat for Humanity	Latosha Herron-Bruff, VP Homeowner Services
Legal Aid of Northwest Texas (LANWT)	Nancy Jakowitsch, Attorney; Supawon Lervisit, Attorney
League of United Latin American Citizens (LULAC)	Lee Saldivar, President
Metro Dallas Homeless Alliance (MDHA)	Cindy Crain, Executive Director
National Association for the Advancement of Colored People (NAACP)	Tim Robinson, Housing Chairman
North Central Texas Aging and Disability Resource Center	Marty Mascari, Collin County Project Coordinator
Rehabilitation, Education and Advocacy for Citizens with Handicaps (REACH)	Charlotte Stewart, Executive Director
Texas Organizing Project (TOP)	Brianna Brown, Deputy Director
Texas Low Income Housing Services	Adam Pirtle
The Real Estate Council (TREC)	Linda McMahon, President
Texas Workforce Commission (ex officio member)	Lowell Keig, Director, Civil Rights Division

Figure 4: Advisory board members and their organizations

Surveys

Surveys were collected on paper at all public events as well as online. Surveys were collected from residents throughout the region, including from the City of Frisco, Collin County and Denton County, where the NTHRA collected a total of two hundred twenty surveys. The appendix includes copies of the questionnaires used throughout the public participation process.

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

Date	Organization	Attendees	Event/Topic
3/24/2017	BC Workshop	Staff	Discuss AFH process and research on affordable housing strategies
6/9/2017	Center for Public Policy Priorities	Subject matter experts, board members	Board meeting/presentation addressing changing demographics and strategies to discuss social inclusion, racial inequities
2/21/2017	Center for Public Policy Priorities	Frances Deviney, Director of Research	Discuss research on women, economic opportunity and housing
9/21/2017	Center for Public Policy Priorities	Dick Lavine, Senior Researcher	Discuss policy to address rising property taxes and housing affordability
3/8/2018	City Square	Staff, affordable housing advocates, stakeholders	Tour of Opportunity Center and tiny home development, discussion of affordable housing programs and challenges
5/3/2018	Communities in Schools	Dr. Judith Allen, CEO; Amy Wyatt, Elementary Programs	Discuss needs of at-risk students and programs available for support
8/23/2017	Community for Permanent Supported Housing	Rachel LeoGrande, President	Gather information on challenges in housing access by persons with disabilities
3/30/2017	Criterion Development Partners	Pretlow Riddick	Discuss barriers to construction of affordable housing
3/6/2017	Dallas Women's Foundation	Dena Jackson, Director, Programs and Research	Discuss AFH process and housing issues related to gender
2/9/2017	Dallas Women's Foundation	Roslyn Dawson Thompson, President & CEO	Discuss release of Women's Economic Issues Report
4/21/2017	City of Frisco & Frisco Housing Authority	Rebecca Barton, Housing Coordinator	Discuss AFH process, including public participation, data, and policy
6/1/2017	Guardianship Services	Executive Director	Discuss programs available to support very-low-income persons with disabilities in housing
4/27/2017	Hap Baggett Properties	Hap Baggett	Discuss issues of affordable housing development and neighborhood revitalization
2/9/2018	Housing Works Austin/Federal Reserve Bank of Dallas	Mayor, County Commissioner, researchers, advocates	Housing + Economic Opportunity Summit (conference)
7/14/2017	HUD	Beth Van Duyne, Regional Administrator	Discuss barriers to affordable housing and strategies for permanent supported housing
3/23/2017	Inclusive Communities Project	Senior staff	Discuss AFH process and barriers to housing
5/15/2017	Kilpatrick Insurance	Kim Kilpatrick-Terrell, CEO and landlord	Discuss impact of insurance costs on housing and experience as landlord with publicly assisted housing

10/24/2017	MHMR Tarrant County	Susan Garnett, CEO, and Elaine Klos, director MR services	Discuss housing challenges facing persons with disabilities and resources available
7/16/2017	National Association of Housing and Redevelopment Officials	Subject experts from industry and academia, PHA executives	Annual Summer Conference focusing on best practices in managing affordable housing
2/28/2018	National Low-Income Housing Information Service	Adam Pirtle, Northwest Texas Director	Discuss AFH data, process, goals
6/28/2017	NTRHA Technical Advisory Board	Subject matter experts in housing and economic development	Discuss barriers to affordable housing
5/19/2017	Texas Civil Rights Project	Wallis Nader, attorney	Discuss impact of probation fees on housing affordability
10/30/2017	Texas Legislature	State Rep. Eric Johnson and staff	Discuss recent legislative strategies to address affordable housing
8/2/2017	University of Kansas	Dr. Kirk McClure, researcher, Mid- America Regional Council/AFH	Discuss strategies for analyzing voucher use and regional management of HCVs
12/21/2017	City of Frisco	Anthony Satarino, Planning Manager and Jonathan Hubbard, Senior Planner	Discuss AFH process, data and policy, opportunities and barriers for affordable housing
11/06/2017	Denton County Transportation Authority	Kristina Holcomb, Vice President, Planning & Department	Discuss transportation opportunities and barrier
12/18/2017	Denton Independent School District	Barb Hafflich, Homeless Liaison Officer	Discuss homelessness in Kids and families in DISD

Figure 5: List of organizations and individuals consulted

3

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?

Effectiveness of Outreach Activities

On a regional basis, community participation (number of people engaged) achieved average industry standards for an assessment of this size, while exceeding standards for impact. NTRHA assured that all input was incorporated in meaningful ways by fitting the public participation strategy to each stage of the project and using experience to inform data gathering in later stages.

NTRHA appropriately leveraged existing local knowledge and relationships to maximize community outreach by incorporating the suggestions of staff from participating cities, housing authorities and counties, as well as industry experts and community leaders. NTRHA is confident that the insights captured through public participation efforts are representative of the diversity found throughout Frisco and the region.

The survey proved to be a useful tool for widespread input and was distributed at community events and public places as well as through established modes of communications and networks. Individuals could participate on their terms rather than needing to go at a specific time to a specific place to give input. The comments that were gathered in the survey were insightful, and NTRHA incorporated them into the analysis of the barriers to fair housing.

As a whole, the most fruitful engagement methods were the targeted focus groups and first round of public meetings. The first round of public meetings was used to present HUD data and get community input on contributing factors to barriers to fair housing. The meetings attracted standard levels of attendance, and the rooms were filled with members of the community eager to engage with the data and talk about their experiences with housing in the region.

Focus groups, organized with the input of local community organizations, were successful because they engaged key populations with diverse experiences throughout the community. Individual focus groups were organized that specifically included persons with disabilities and other protected classes. This permitted insight applicable throughout the region.

NTRHA received comments and questions regarding the public participation process and notification strategy throughout the public participation process. NTRHA prioritized outreach strategies to maximize reach and widen the possibility of diverse input, within its constraints. NTRHA made every effort to include all populations, neighborhoods and other groups during the process. No one was intentionally excluded. NTRHA continuously addressed gaps by adjusting outreach strategy.

NTRHA experimented with scheduling focus groups directly in the community while the public meetings were underway, without success. NTRHA found that it was much more effective to recruit through its client organizations, partner with other community organizations, or leverage existing meetings where a housing focus group could be added to the agenda. This approach also allowed the research team to engage with stakeholders not typically considered in housing analysis. For instance, a focus group conducted in partnership with the Community for Permanent Supported Housing involved many participants who might not normally be comfortable participating in a discussion group that was not designed with their needs in mind. Additionally, the NTRHA research team was responsive to the needs of the various communities

in question by creating and distributing a survey that allowed individuals who could not attend public meetings or focus groups to contribute meaningful insight.

Looking specifically at participation in Frisco public events, participation was lower than in larger jurisdictions. Still, the level of participation in Frisco public meetings was sufficient to provide real insight regarding conditions in the area. The process of tapping public insight was vital in providing local knowledge on issues NTHRA would not have had access to otherwise.

Strategies to Improve Community Participation

NTRHA developed online polling to gather feedback and allow respondents to participate in voting on the importance of each suggested goal to maximize meaningful community input. There was little engagement in online polling, which the research team suspects could be the result of the difficulties inherent in providing sufficient written narrative or explanation online that allowed the community to vote with confidence. Budget and time constraints did not allow for the presentations to be videotaped and placed online. In the future, doing so over the course of public participation could offer community members a common vocabulary and base of knowledge that would allow for increased participation in the online polling platform.

NTRHA acknowledges that social media (Facebook) was not leveraged to the fullest extent due to constraints in time, budget and staffing resources. Utilizing social media more frequently and boosting engagement through “paid posts” and other methods could widen the reach among populations who have online access. Social media resources were redirected into other outreach methods that proved more effective in reaching specific protected class groups.

Addressing the needs of the LEP population beyond Spanish-speaking individuals could have benefited by additional efforts. Materials were often offered in English and Spanish only. Using more language versions of outreach materials might have informed more LEP residents. Other strategies might have been more effective, such as door-to-door outreach in certain communities or provision of transportation, but were clearly beyond the resources of the project.

Lastly, the second round of public meetings was not as well attended as the first, although the meetings were publicized through the same traditional media outlets, social media, printed flyers and community organizations. NTRHA also communicated with individuals who expressed interest in updates on the research by using email addresses obtained from focus group/public meeting sign-in sheets, surveys and any written comments, to recruit for second-round meetings. Low attendance could be partially attributed to the fact that the first round of public meetings was in the summer and the second round was during a winter that was particularly cold and windy by North Texas standards. This made it difficult for some individuals to leave home and travel to a public meeting. Another reason could be that all interested parties felt that they had already offered sufficient input. More accurately explaining the difference in the public meetings could have addressed this barrier.

In all, while participation numbers ebbed and flowed throughout the life of the project, NTRHA is pleased with the quality of engagement. Community members were invited regularly to share insight that had tremendous impact on the research, and comments were incorporated not only into the final report but also informed subsequent phases of the project. The research team was responsive to the communications needs of the community and adapted the public participation strategy as issues and shortcomings were identified.

4

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

Comment Summary

NTRHA engaged the public throughout the research and reporting process, eliciting a substantial body of input spanning the region that was both qualitative and quantitative in nature. The NTRHA public participation strategy was specifically designed to maximize responsiveness to the phase of the research in which it was gathered, so that it continually informed the process and shaped later engagement and research efforts. The substance of one hundred seventy-nine distinct comments offered over the course of public meetings, focus groups, and surveys for the City of Frisco and Frisco Housing Authority is summarized below. Comments are organized into contributing factors to barriers to fair housing.

// Contributing Factors to Segregation

- Planning has potential to desegregate. The goal is to provide different housing types for all sectors of the population.

Contributing Factors to Access to Opportunity

- The biggest barrier is land value, rather than architectural restriction or building codes.
- We have group building on the northside and there is no way, its middle of nowhere where there are no other services. No employment to walk to in over a mile, there is a school but you need to cross significant road to get there. It's hard to survive without a car.
- Land prices are the possible biggest hindrance to affordability. Not much of it is in the city's control regarding land price but we try to provide variety.
- Housing demand is so high, it's an issue. It's growing demand, as you see, as Frisco builds out and yes, if comprehensive plan is correctly approach for 375,000 people, there will be large demand for some type of public transit, either commuter rail or other form.
- In the older part of town, housing is more affordable than any affluent part of the city. It does not surprise me. There are definitely more options to walk as it's centrally located.
- I would like to see social services grow in our city because students, teachers, and low-income residents in our community are really in need of these services.
- The employers look for young adults.
- There's nowhere to go for emergency services to help families in time of crisis.
- lots of younger families moving here for jobs but child care and district requirement for school enrollment are intertwined.
- Uber helps but not everyone can afford it.
- The young adult population is increasing and a lot of them depend on their families because there isn't something for them and they don't know where to go.
- Cultural engagement, walkability, free entertainment are things we want here. More parks and to make Frisco green. Let's not overpopulate. There is too much traffic.

Contributing Factors to Disproportionate Housing Needs

- One bedroom, in Frisco square, is somewhere between mid-\$900 to \$1200 range.
- There are beautiful apartments put in place that were cheaper but made poorly. Mold everywhere and thin walls. It was housing for the poor and that's all.

- We're missing more involved communities, normal apartments with sections and not just a single building like the Samaritan Inn. We need more pieces to the puzzle.
- If there is more than one child in a home then more than a one room apartment is required, which makes it harder to afford.
- There is a need for housing for the middle class.
- 25% of your income should go to your housing. But it has been 33 to 50% my whole life to live in this place that I wanted to live in. I pay 50% and don't have a car payment. There's not much left to eat and I'm worried that the rent will increase.

Contributing Factors to Publicly Supported Housing

- We don't want to see homelessness in our city and the solution is not to just send them to Dallas County. We need to address these issues before they became chronic. We need emergency shelter, transitional housing, not a rapid rehousing.
- Affordable housing gets a stigma because the neighborhoods go crazy. Affordable housing is a fire storm in most communities. We need to get past this fear of affordable housing.
- Homeless shelter for kids was closed in January because the neighborhood did not like it. Single women are many of the clients for homeless services here. We are overwhelmed with people looking for help with our Tiny Homes program. Shannon White started the Tiny Home program.
- Affordable housing is barely affordable. There's lot of turnover in the communities.
- There's a lack of planning for some affordable housing in this area. The city does a great job for businesses but they don't do anything for affordable housing. Planning must plan for affordable housing.
- It's six months to accept a housing voucher. It was very hard to get accepted. They prejudice who you are.
- Collin County doesn't have any emergency services and social services are before the eviction but not after the eviction.
- Where is the incentive for the better apartments to accept these lower-income people? Individual landlords won't do this.
- There's a need for help for single parents who can't afford rent.

Contributing Factors to Disabilities and Access to Opportunity

- Elderly don't have resources. They only receive disability money and social security et cetera, and it is not enough. There are no transportation options for the elderly.
- The homeowner's association had to close a group home here. We are having to send them to Dallas. The county doesn't allow or have anything for them. Nowhere to go with the funding for the needy.
- Some buses don't even have a wheelchair provider.
- Affordability for disabled with limited income is a concern.

Contributing Factors to Fair Housing Enforcement

- Informal and formal information sharing make it difficult to get affordable housing.
- Organizations are getting the funds but they aren't allowed to do anything with them.

IV. Assessment of Past Goals and Actions

1

Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

Frisco is considered one of the nation's most desirable places for development. It is young, rapidly growing and relatively affluent. Given all these factors, as well as Frisco's status as a relatively new city, planning decisions made today will play a particularly vital role in shaping what Frisco will look like going forward. Out of the 12 major guiding principles formulated in the City of Frisco's Comprehensive Plan for 2015, the planning team and stakeholder representatives have included three principles pertaining to housing goals. They are as follows (City of Frisco, 2015):

- PRINCIPLE 7: Frisco is diverse, with a variety of housing, shopping, arts/culture and entertainment choices.
- PRINCIPLE 9: Frisco's neighborhoods—of all types—remain vital and desirable, even as they mature, and provide a variety of housing choices that meet the needs of people at all stages of their lives.
- PRINCIPLE 11: Frisco is a walkable city where most residents have ready access from their homes to schools, jobs, open spaces, shopping, entertainment, a variety of mixed-use places and other destinations using travel modes in addition to the auto (such as walking, biking and public transportation).

Within its Comprehensive Plan, the City of Frisco articulates three major goals specifically pertaining to fair housing. These goals were crafted with the intention of providing affordable housing opportunities and addressing the needs of persons experiencing homelessness:

1. **Owner-Occupied Housing Rehabilitation**
2. **Homeless Support**
3. **Homeless Prevention**

In the Annual Action Plan for 2014, these goals are described in detail with the following objectives (City of Frisco, 2014):

Housing

Goal No. 1: Maintain the City's current affordable housing stock through home rehabilitation, while also pursuing new opportunities for expansion of affordable housing for Frisco's residents and workforce.

Objective 1.1: Maintain the City's current affordable housing stock through – Owner occupied housing rehabilitation.

Objective 1.2: Address the need for affordable housing through the acquisition of lots for affordable housing construction

Objective 1.3: Address the need for affordable decent housing by offering Down Payment Assistance to low to moderate income households.

Objective 1.4: Address the need for transitional housing by rehabilitating a single family home to be used for transitional housing for youth.

Homelessness

Goal 2: Continue to support households at-risk of homelessness with necessary support services, as well as, continue to support programs offering transitional housing opportunities for homeless families and individuals.

Objective 2.1: The provision of transitional housing programs for homeless persons. Collin Intervention to Youth (CITY House), Activity 66, expended \$4,060 to provide transitional housing services to nine (9) homeless youth.

Objective 2.2: Focus on support services, counseling programs and career development focused on insulating Frisco residents from homelessness.

Homeless Special Needs

Goal 3: Improve the lives of special needs populations

Objective 3.1: Support through public service funding, support services and programs for elderly persons.

Objective 3.2: Support through public service funding, support services and programs for disabled persons.

Objective 3.3: Support through public service funding, support services and programs for abused children.

a

Discuss what progress has been made toward the achievement of fair housing goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete
Homeless Prevention	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	
Homeless Prevention	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0	
Homeless Prevention	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	4000	1220	30.50%
Homeless Support	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	
Homeless Support	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	50	27	54.00%
Homeless Support	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	
Owner-occupied housing rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	6	12.00%

Figure 6: Accomplishments in fair housing goals, City of Frisco, from 2015 CAPER

Frisco's 2015 Comprehensive Annual Performance Evaluation Report (CAPER) shows some progress made in housing efforts (Figure 6)Figure 6: Accomplishments in fair housing goals, City of Frisco. In total, 1,220 persons received services via homeless prevention and homeless support programs. As per this report, the number of persons receiving homeless prevention services exceeded the expected goal by 205 persons, or 20%. Twenty-seven people were given shelter and services at a transitional housing facility that actually missed expectation by two persons, or 7%. Six households were provided services of rehabilitation and received repairs, four fewer than the expected total of ten.

b

Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).

As per CAPER 2015, funds were expended for implementing programs addressing the top two fair housing priorities. These included prevention of homelessness and support for persons experiencing homelessness, in addition to housing rehabilitation. The City of Frisco has used federal and local resources to address these priorities.

As per the goals articulated by the City of Frisco, the plan was for ten non-homeless households to be provided with affordable housing opportunities. In the end, six such households were actually provided affordable housing. Frisco reports that this result stemmed from a lack of applications received from residents. This occurred despite awareness of the program and outreach on the part of Frisco officials.

C

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 relatively low number of applications for affordable housing opportunities and housing assistance represents the principle challenge to achieving fair housing goals articulated in Frisco. Despite efforts at achieving awareness, greater awareness likely would lead to additional applications. In accordance with this concept, the City of Frisco mentioned in its CAPER that it intended to increase the focus on implementing program awareness activities, including group presentations, a booth at city events, flyers, mailers and information on the website. These and other outreach methods could prove an important step in generating additional awareness and thus providing a platform for fair housing expansion.

A more effective approach for increasing the number of affordable housing units and building upon existing would serve as an important step for Frisco. The Frisco Housing Authority has served 20 public units since the beginning of its existence. Adding more affordable housing would make Frisco more accessible to low- and moderate-income households. This would help the City as it seeks to diversify its population and employment base, as well as address an emerging need for affordable housing. Currently, relatively little emphasis has been placed on fair housing goals or the cultivation of affordable housing in Frisco. Collaboration between the City of Frisco, Frisco Housing Authority and other regional actors could help set goals and create programs to address fair housing issues.

d

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

Experience with the previously described conditions influences current goals because the past highlights the importance of both access to opportunity and supply of affordable housing. Although existing efforts have delivered some measure of success, additional measures appear necessary. The Frisco Housing Authority and the City of Frisco have demonstrated their ability to contribute in generating and carrying out solutions that further fair housing. Concerted action and cooperation on the part of these and other regional entities will prove important in accomplishing their future fair housing goals. The limitations of siloed efforts carried out previously have affirmed the need for such collaboration. Collaboration, as well as public feedback and data, serves to guide the selection of current goals.

V Fair Housing Analysis

1. Demographic Summary

1 Describe demographic patterns in the jurisdiction (and region, if applicable). Explain how demographic trends have changed over time?

Frisco is located in Denton and Collin counties, less than 25 miles from DFW International Airport, Dallas Love Field and downtown Dallas, and has been identified as one of the nation's brightest spots for development.

In the decennial census survey, the population skyrocketed from 6,138 in 1990 to 116,992 in 2010. As with any successful city, transportation has been the key to the development of Frisco, and it started with railroads and water lines to serve locomotives. Frisco has recently grown at an annual rate of around 5.9%, with a compound annual growth rate for the past five years of 4.6%. The City of Frisco estimates the current population is just short of 160,000. Based on certificates of occupancy, housing unit completions, vacancy rates, persons per household calculations and land use estimates, the City's updated Comprehensive Plan projects a population of 370,000± at buildout (City of Frisco, 2018).

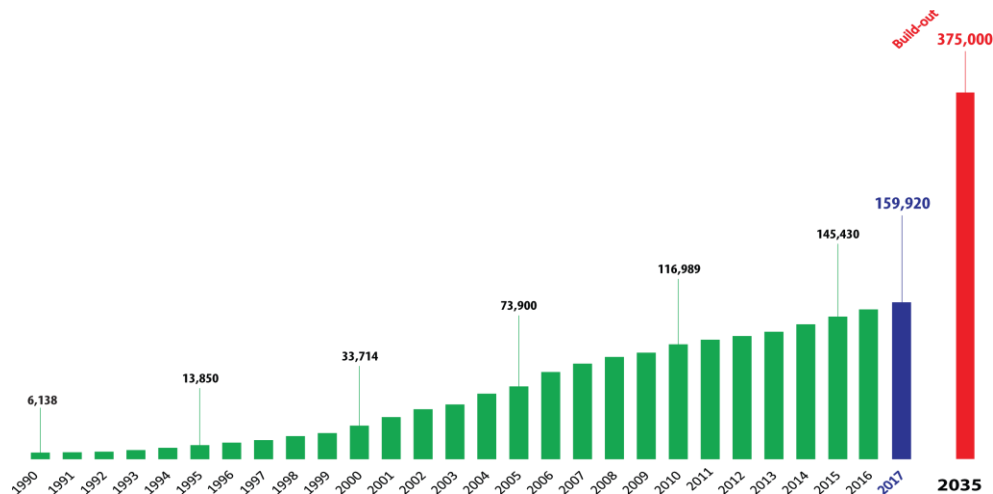


Figure 7: Population growth, estimates and projection, Frisco (1990-2035). Source: NCTCOG and Decennial Census

Frisco's population began to increase around 2000. From there, Frisco grew about 247% in a decade, compared to regional growth of 20%-30%. In 2000 the 5-17 age group accounted for the highest proportion of the populace (23.7%), followed by the 35-44 age group (22.5%). Frisco is a young community with a median age of 36.

Race/Ethnicity

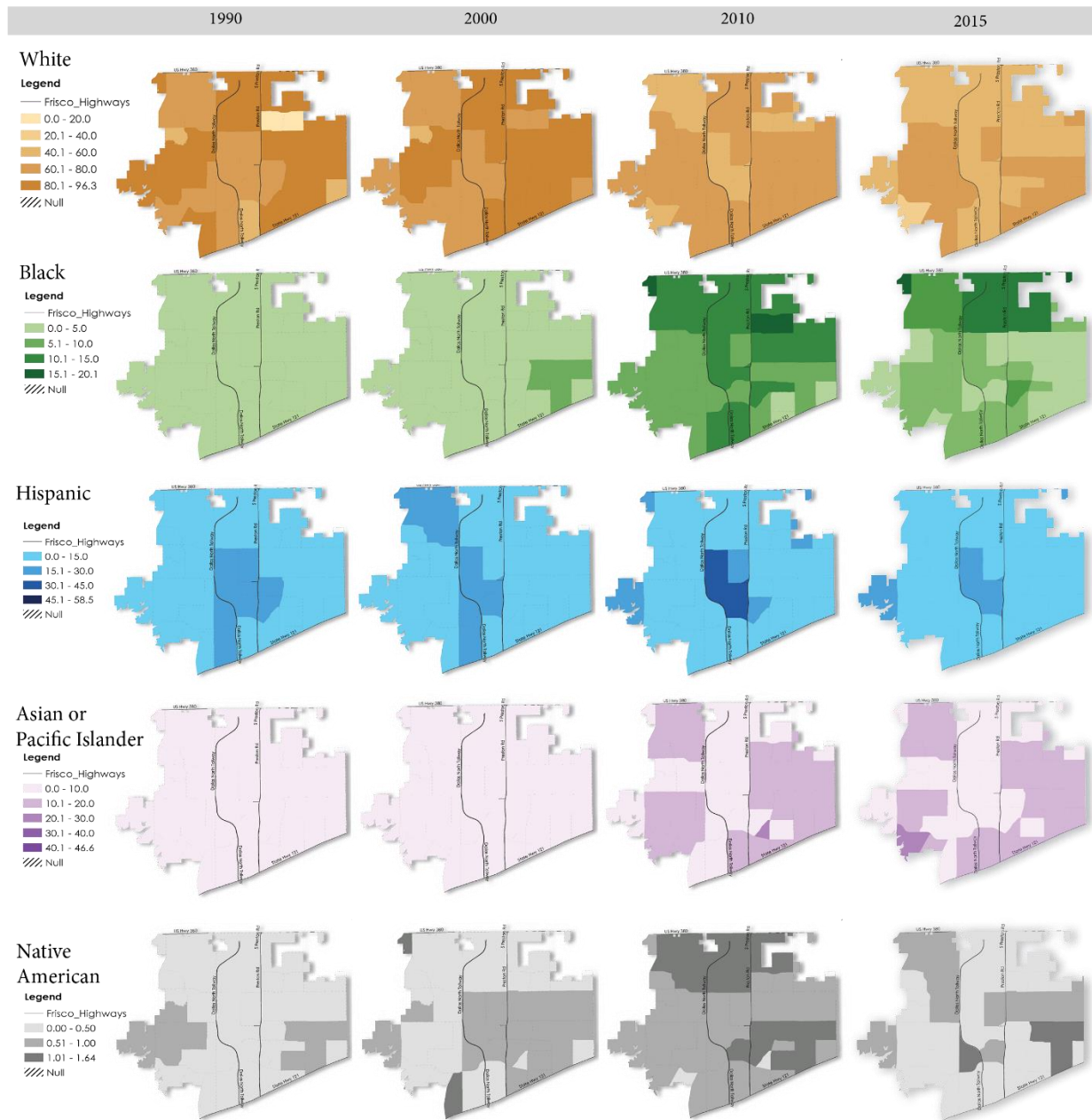


Figure 8: Race/ethnicity trends in Frisco, 1990-2010 US Decennial Census

In 1990, white residents composed 80.4% of the population in Frisco. As shown in maps in Figure 8, white residents were evenly distributed in 1990, with the majority of census tracts ranging from 60% to 96.3% white. In 2000, the concentration of white residents remained high (81%), with a minimum of 50% white residents per census tract. However, the white population declined from 2000 to 2010, to 67% of the total. Still, the white population represents a majority in most areas. This was the case everywhere outside portions of downtown Frisco and the northeast, which experience greater diversity. This diversity became even more evident by 2015, though white residents remained predominant in several portions of the City.

Black residents accounted for less than 4% of Frisco's total population in 1990 and appeared evenly distributed throughout the City. By 2000, higher concentrations of black households appeared in the southeast sections of Frisco, and in 2010 the percentage of black residents more than doubled to well over 8% of the total population (US Decennial Census, 2010). Figure 8 shows that this emerging black population primarily concentrates in the northern and eastern parts of the City, with the highest concentrations north of Eldorado Parkway, near SH 121, on both sides of the Dallas North Tollway up to Legacy Drive on the west and Preston Road (SH 289) on the east, and the southwest corner of US 380 and FM 423.

From 1990 to 2000, the Hispanic population decreased from about 14% of the total population to roughly 11.5%. Figure 8 shows that Frisco's central-city area and portions of west Frisco have a concentrated Hispanic population, with some portions of the City containing up to 30% Hispanic residents in 2010. The overall Hispanic population grew slightly to 12.5% in 2010. A de-concentration of Hispanics occurs by 2015 in several areas, including central Frisco.

Between 1990 and 2000 Asian/Pacific Islander (Asian/PI) residents increased slightly as a percentage of the whole population. By 2010, the Asian/PI population had grown significantly and accounted for almost 11% of the City's population. This population concentrates outside central Frisco, which has a higher Hispanic concentration. Meanwhile, Native American residents have consistently made up just below 1% of the population over the past two-plus decades.

With Frisco's continuing overall increase in population, it has experienced changes in ethnic composition. The black population has remained concentrated on the north side, whereas south of Eldorado Parkway it has decreased. Although the white proportion still remains larger than any other population, the size of its majority has decreased by 2015. Similarly, the Hispanic population proportion has decreased, which stands in sharp contrast to the regional increase in Hispanic proportion. The growth of the Asian/PI population accounts for most of the considerable changes to Frisco's composition.

White residents' portion of the population in both Frisco and the region decreased since 1990. That decline appears particularly evident from 2000 to 2010 in Frisco, or from 1990 to 2010 throughout the DFW region. Frisco experienced an increase in the black population from 2000 to 2010, while the black population in the region remained relatively unchanged. Frisco does not reflect the dramatic growth in the region's Hispanic population (Figure 9). On the other hand, the growth of the Asian/PI population in Frisco outpaced the DFW region.



Figure 9 Race/ Ethnicity trend for Frisco (left) and DFW Region (right,) U.S. Decennial Census and ACS

National Origin

Mexico represents the most frequent country of origin for the DFW regional immigrant population and accounts for 10% of the immigrant population in the region (Figure 10). Regionally, India represents the second most frequent country of origin at about 1% of all immigrants. This pattern switches in Frisco, where Indian immigrants outnumber Mexican immigrants. Furthermore, India represents the country of origin for almost 3% of all immigrants.

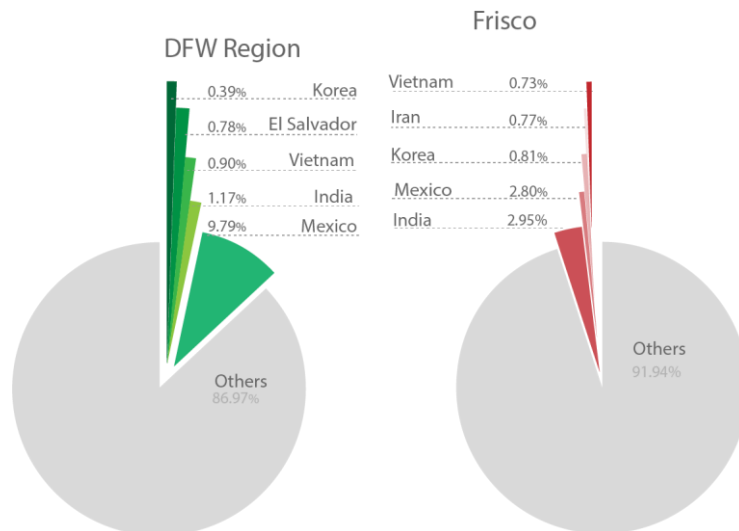


Figure 10: Top five population by place of birth, DFW Region and Frisco (Decennial Census)

Both the DFW region and Frisco experience significant increases in the foreign-born population from 1990 to 2013 (Figure 11). In 1990, Frisco's foreign-born population accounted for 5% of the total population, but this proportion tripled by 2013. In the DFW region, the foreign-born population started at 8% in 1990 and more than doubled by 2013 to 18%. The limited English proficiency (LEP) population demonstrates a significant difference between Frisco and the region. At the regional level, the LEP population proportion doubled from 6% to 12% from 1990 to 2010. Frisco started at the same 6% proportion but experienced no change in proportion over the same time period. While the immigrant population of both Frisco and the DFW region appears to be increasing, Frisco residents appear significantly less likely to experience LEP, which may indicate that immigrant concentrations in Frisco may be self-selected rather than segregated.

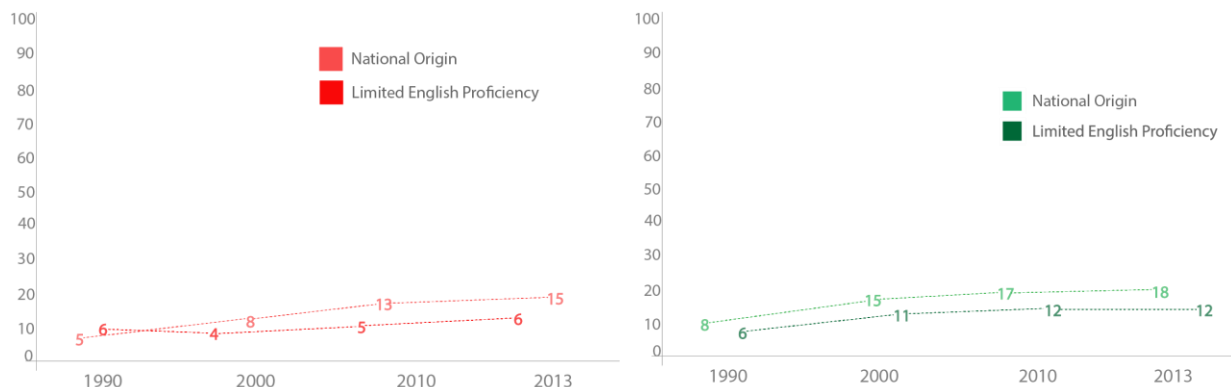


Figure 11: Foreign-born and limited English proficiency residents in the Frisco (left) and DFW Region (right) (US Decennial Census and ACS, 1990-2013)

Looking at the issue more closely, Figure 12 shows that within Frisco, immigrants remained un-concentrated in Frisco until 2000. By 2000, a concentration in the central city between Dallas North Tollway and Preston Road (SH 289) developed. By 2013, significant concentrations developed in southwest Frisco (one census tract is 48% immigrant) and persisted in central Frisco. Northeast and northwest Frisco also experience concentrations appearing in some census tracts.

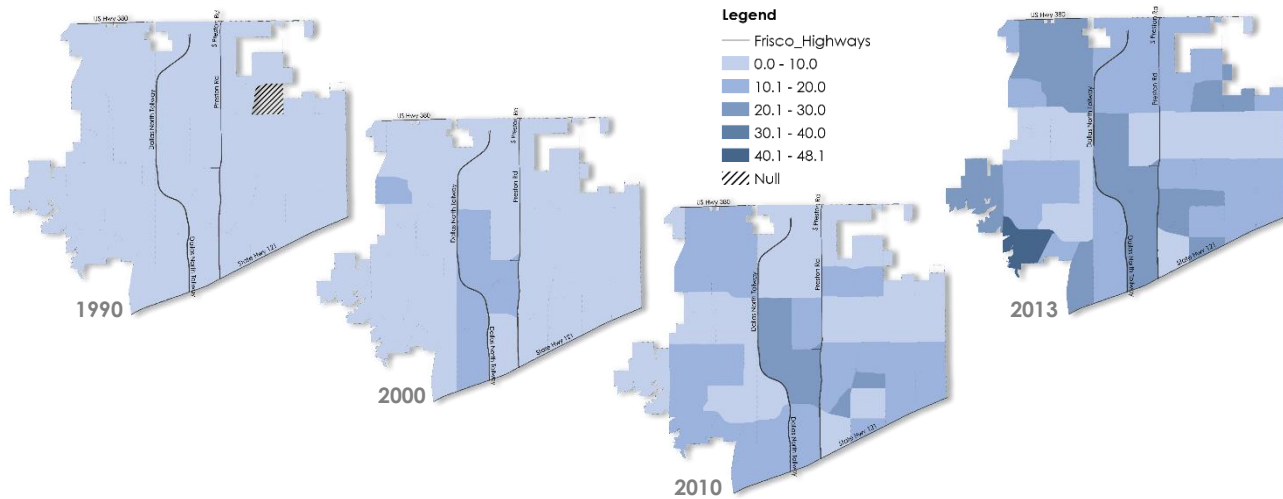


Figure 12: Trend of Spatial distribution of the foreign-born population in Frisco from 1990 to 2013 (US Decennial Census and ACS)

Limited English Proficiency

The LEP population in Frisco appears to concentrate most significantly in the same census tracts as the Hispanic population rather than the foreign-born population. This pattern of concentration in central and western Frisco has intensified from 1990 to 2013.

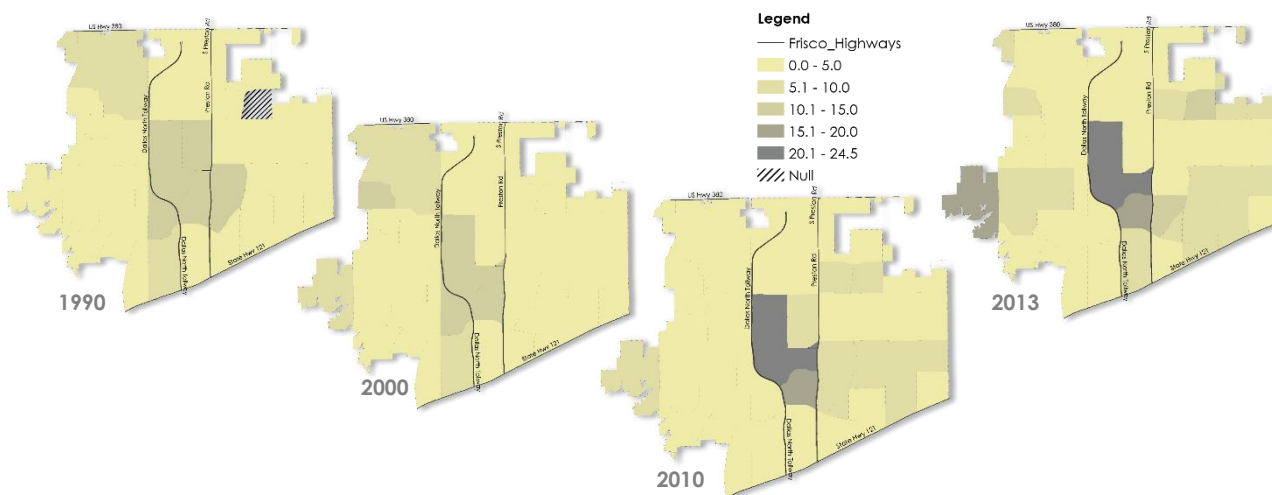


Figure 13 Trend of Spatial distribution of LEP population in Frisco (US Decennial Census and ACS)

Spanish speakers represent the largest LEP group in Frisco (3,357 people, 2.98%) and the region (Figure 14). In Frisco, Korean (549 people, 0.49%) and Vietnamese (479, 0.43%) speakers represent the next two largest LEP groups. These languages also appear among the top five most frequently spoken languages by LEP residents throughout the region.

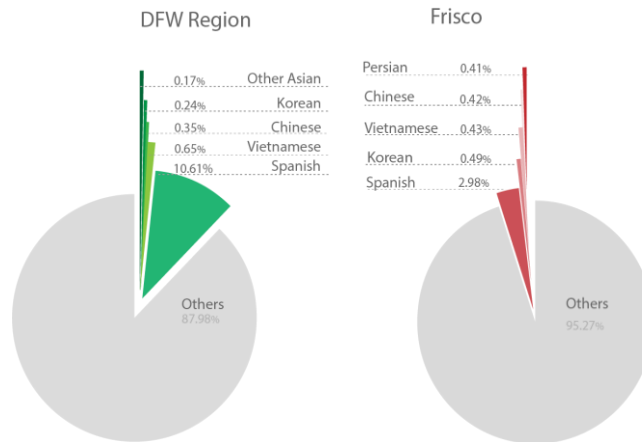


Figure 14: Top five languages spoken in, DFW Region and Frisco (US Decennial Census)

2. Segregation/Integration

a Describe any areas of segregation and integration in the jurisdiction (and region, if applicable). Identify the protected class groups living in any such areas. Explain how areas of segregation have changed over time.

From 1990 to 2013, the dissimilarity index¹ indicates an increase in segregation for all comparison groups in Frisco. Despite that increase, the level of segregation in Frisco remains low, according to the dissimilarity index. A low level of segregation in Frisco between white and non-white residents exists. With a value of 28 in 2013, the black comparison group exhibits the highest level of segregation among those shown in Figure 15 for Frisco. The increases in the dissimilarity index represent a future concern for Frisco; however, across all groups, Frisco registers far less segregation than the region as a whole.

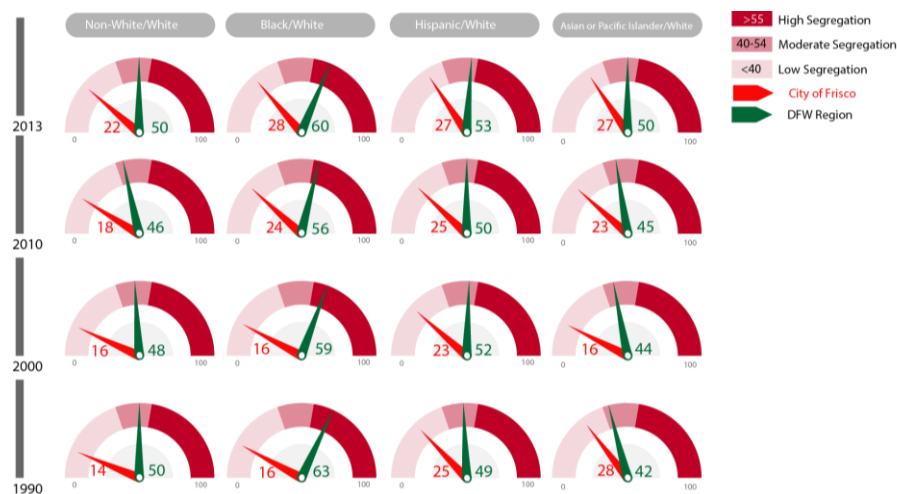


Figure 15: Dissimilarity index values for the City of Frisco and region (Decennial Census and ACS, 1990-2013)

To supplement the HUD-provided dissimilarity index and assess spatial patterns of segregation, the study created additional maps to identify potential disparities in racial composition between the City and its neighborhoods (census tracts). The maps aid in assessing the extent that racial composition of a given neighborhood differs from the overall jurisdictional racial composition. For the full methodology, refer to Appendix A.

Again, the city registers low segregation between white and non-white residents. Figure 16 illustrates the spatial divide that exists in Frisco, with a slightly greater concentration of the non-white population in central Frisco and clusters of white residents throughout much of Frisco.

Frisco has five areas of relative² integration, where the racial composition of the neighborhood appears comparable to the overall city. Specifically, integrated areas occur along (1) US 180 in the northwest, (2) near Stewart Creek, (3) north of SH 121, (4) enclosed by north of Eldorado Parkway and Panther Creek Parkway, and (5) north of Eldorado Parkway near Foncine Settlement Park.

¹ The HUD dissimilarity index measures the degree of residential segregation between two groups. Higher index values mean greater segregation. Values from 0 to 39 indicate low segregation, from 40 to 54 moderate segregation, and from 55 to 100 high segregation.

² The overall racial composition of the City is the benchmark; therefore, the dissimilarity index values discussed previously reflect the expected population composition.

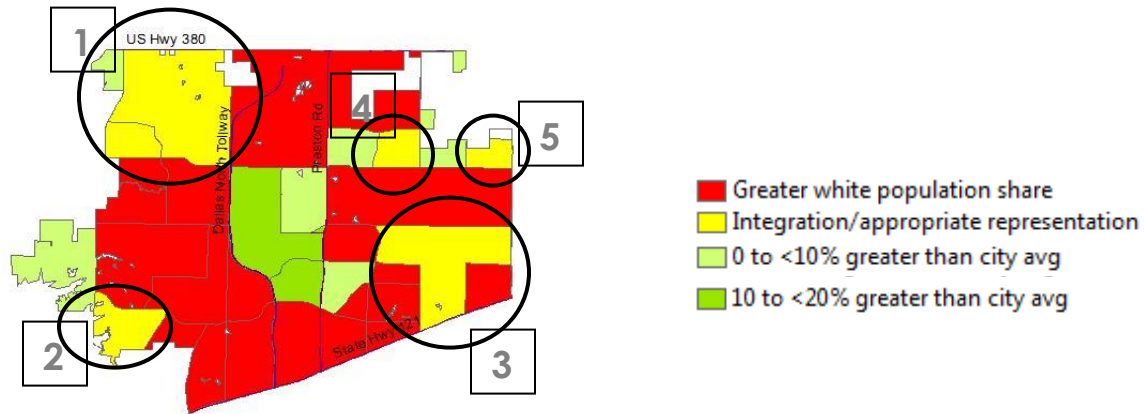


Figure 16: Non-white/white segregation in Frisco, ACS 2015 data.

Spatial black/non-black segregation in Frisco (Figure 17) reveals a mild concentration of black residents north of Eldorado Parkway and the Panther Creek area. Another concentration occurs in south Frisco around the Dallas North Tollway and Preston Ridge. Central Frisco has a proportion of black residents similar to the overall jurisdiction.

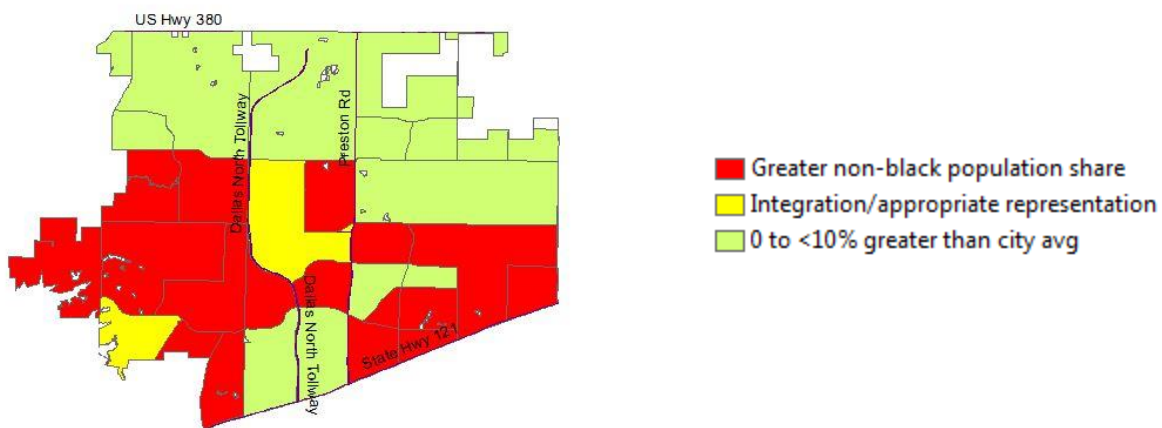


Figure 17: Black v. non-black segregation in Frisco, ACS 2015 data

Figure 18 indicates that the non-white population in central Frisco appears largely Hispanic. A concentration of Hispanics between 10% and 20% greater than the jurisdictional proportion exists in the area enclosed by the Dallas North Tollway, Preston Road and Eldorado Parkway, and the Golf Club at Frisco Lakes.

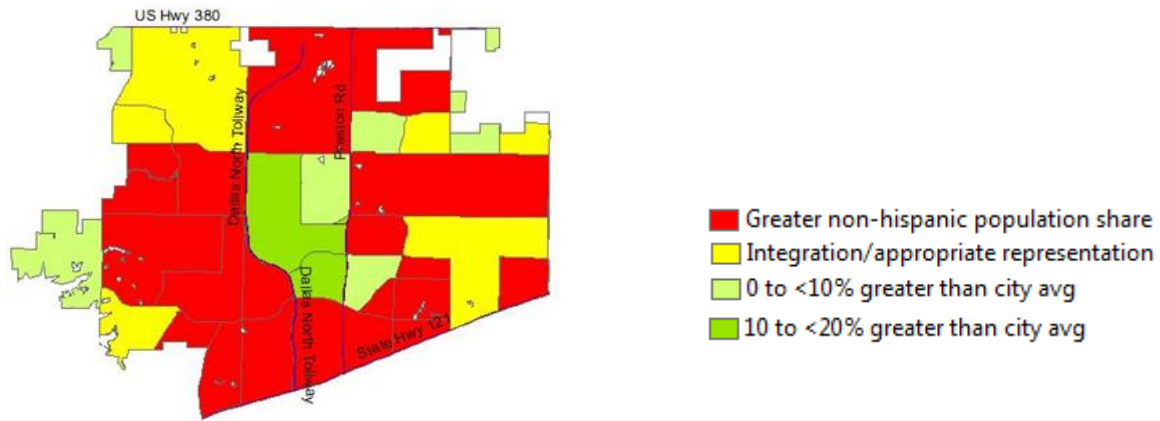


Figure 18: Hispanic v. non-Hispanic segregation in Frisco, ACS 2015 data

Figure 19 shows that no neighborhoods in Frisco contain a proportion of Asian/PI residents far greater than the Asian/PI population in the jurisdiction as a whole. Still, differentiation between central Frisco and most other census tracts occurs. An above-average share of Asian/PI residents typically coincides with tracts that have an above-average share of white residents.

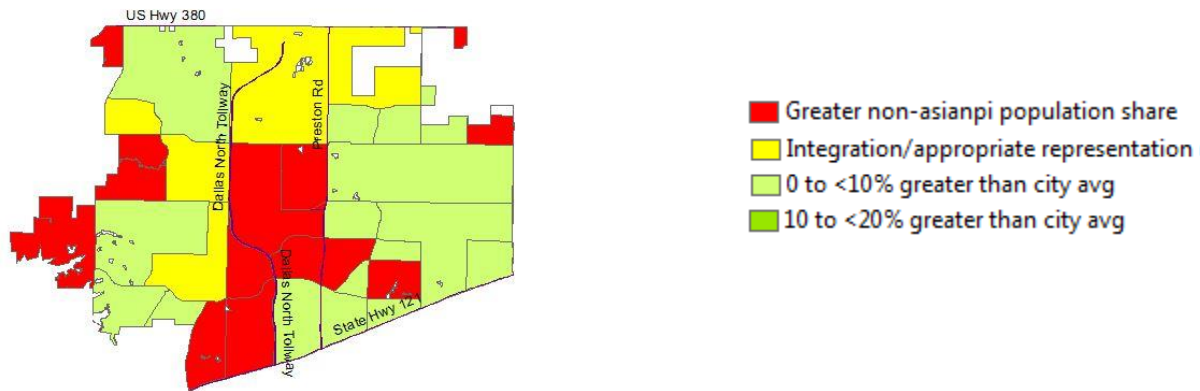
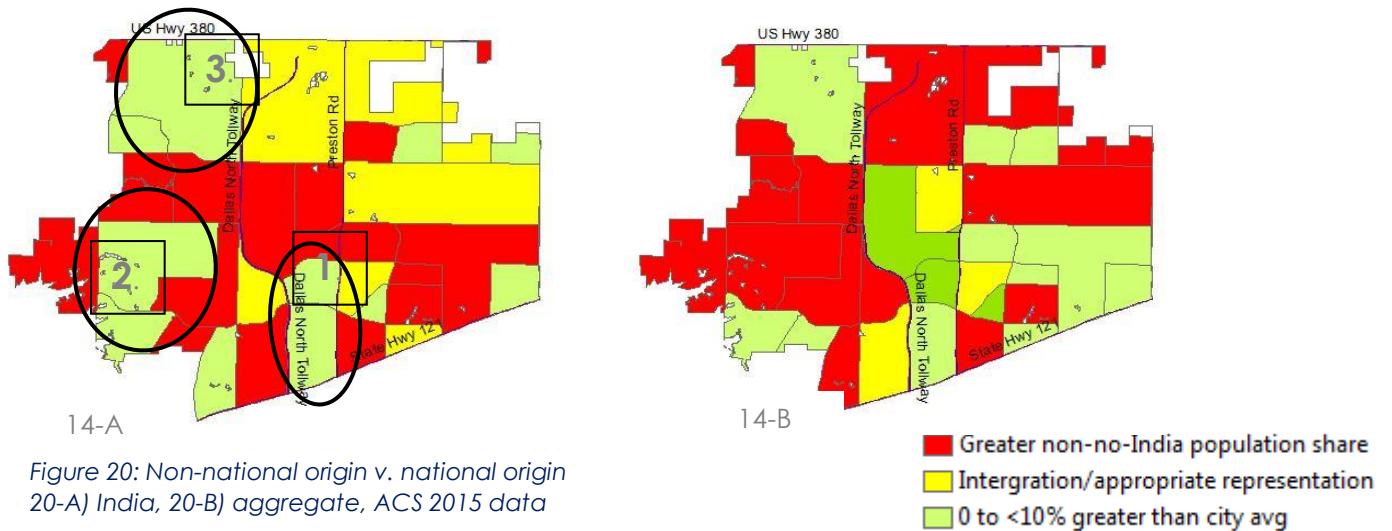


Figure 19: Asian/Pacific Islander v. non-Asian/Pacific Islander segregation in Frisco, ACS 2015 data

National Origin



From 1990 to 2013, the number of foreign-born residents in Frisco tripled, from around 5% to 15% of the population, and India provides the largest share of the immigrant population. A few clusters emerge across the City where the number of residents from India is 10% greater than the jurisdictional proportion. These clusters appear (1) enclosed by Stonebrook Parkway, the Dallas North Tollway and SH 289, (2) south of Main Street around Phillips Creek Ranch and (3) enclosed by US 380, Eldorado Parkway and the Dallas North Tollway (Figure 20-A).

The aggregate national origin map (Figure 20-B) paints a slightly different picture. It shows the greatest concentration in central Frisco and lesser concentration in southeast Frisco.

Limited English Proficiency

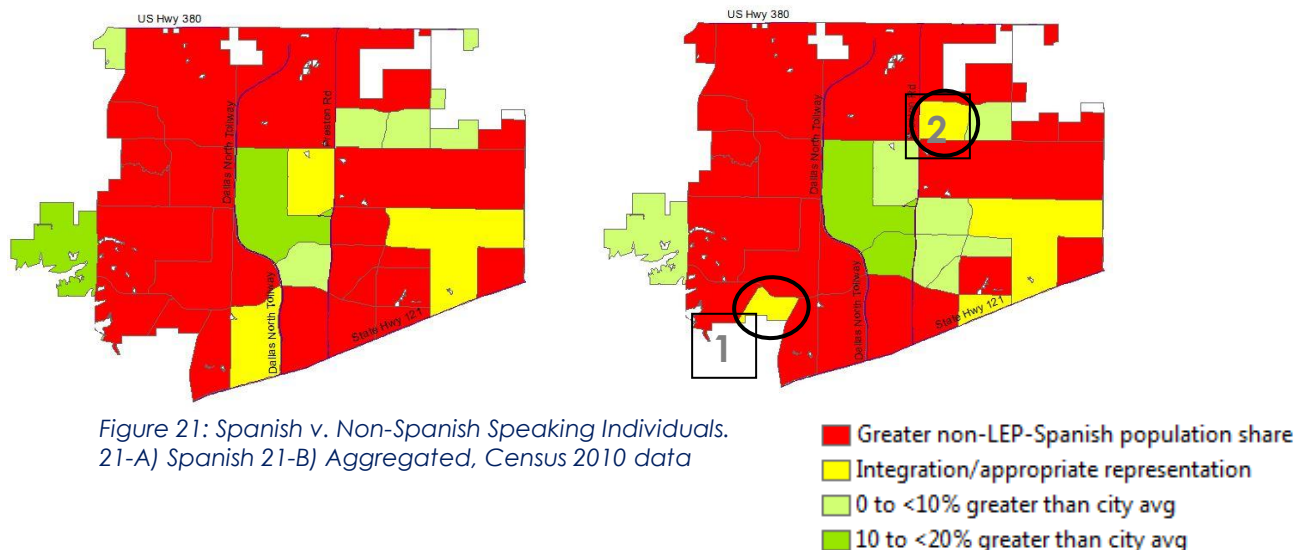


Figure 21-A shows that Spanish-speaking residents disproportionately concentrate in central and west Frisco. Other portions of the City have a smaller share of Frisco's Spanish-speaking population. The overall pattern for LEP residents appears similar to that for Spanish-speakers, as depicted in Figure 21-B.

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

According to the Inclusive Communities Project's apartment survey in 2017, none of the multifamily properties surveyed accept Section 8 Housing Choice Vouchers (ICP, 2017). This implies a presence of segregation for low-income residents. Among the 26 surveyed cities in Dallas, Collin, Denton and Rockwall counties, all market-rate apartment complexes refused to accept HCVs.

The Analysis of Impediments conducted for Frisco in 2010 studied a few of the major barriers to affordable housing. The document concluded that "the major barrier to affordable housing remains a limited supply combined with high land and construction costs" (City of Frisco, 2010). Less than 5% of the current housing stock in Frisco was built before 1980, which contributes to the relative absence of low-cost homes available for sale in Frisco. The available lower price homes are typically older and in poor condition and/or sell quickly. (City of Frisco CDBG Annual Action Plan, 2014). According to "The Best Places: Frisco", Frisco's cost of living is very high compared to the U.S. average (2016). Median household income is \$112,155 and income per capita \$43,595, according to American Community Survey data. Income restrictions in the tax credit projects for low-income residents vary from \$26,400 to \$30,120 for one person to \$37,650-\$43,020 for four persons. Even supported by subsidized rents, the very-low-income group cannot afford these apartments. Income restrictions set by the private apartments in Frisco with LIHTC vary (Preston Trace Apartments, 2018) (Capstone Real Estate Services, Inc, 2018) (UMoveFree, 2018).

North Court Villas: 1P* \$30,120; 2P \$34,440; 3P \$38,760; 4P \$43,020

Stonebrook Village: 1P \$31,680; 2P \$36,180; 3P \$40,680; 4P \$45,180

Preston Trace: 1P \$27,750; 2P \$31,700; 3P \$35,650; 4P \$39,600

*P = person

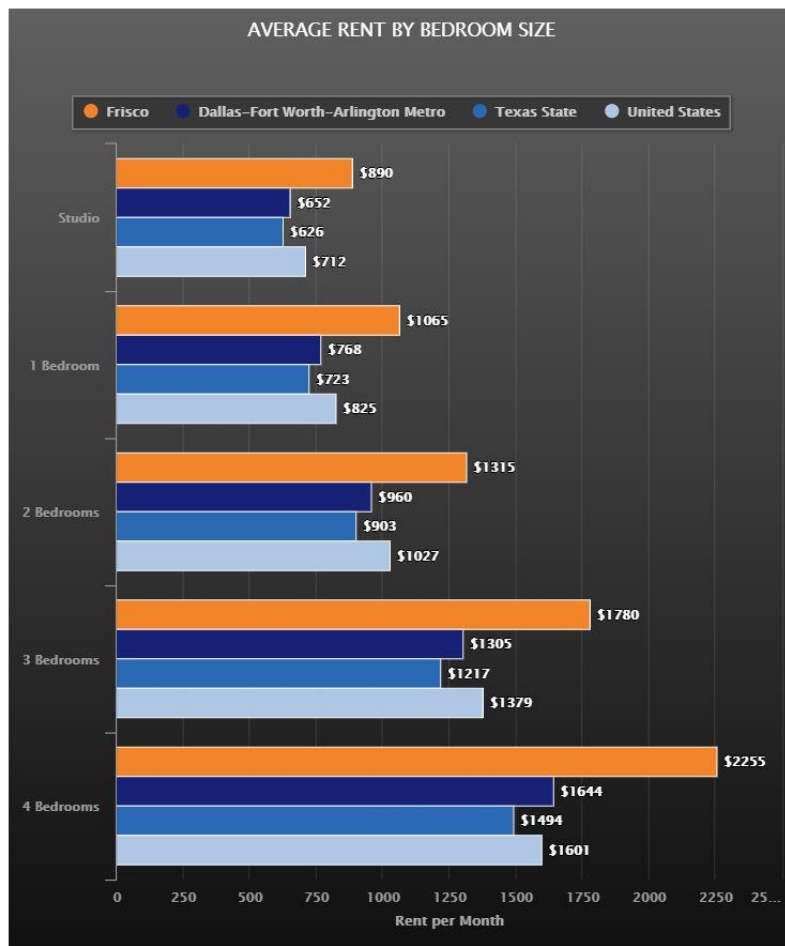


Figure 22: Average rent by bedroom size, City of Frisco, Texas and USA, CHAS 2014 data

Frisco offers a range of units with different bedroom sizes; however, the price of these remains higher than comparable units elsewhere, including throughout the region (Figure 22). While this makes sense given the large percentage of the population in upper-income brackets, it does mean that those in lower income brackets might have particular trouble finding low-rent units.

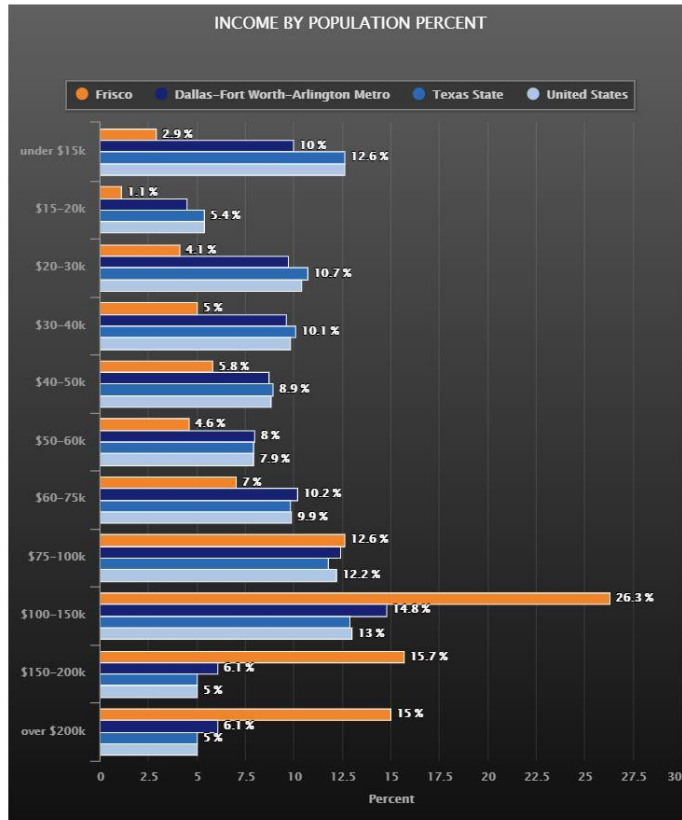


Figure 23: Income by population percent for City of Frisco, ACS 2015 data

In a public meeting, attendees indicated a lack of information as a major deterrent to obtaining affordable housing. As was expressed in the 2010 Analysis of Impediments, the public still feels a lack of information regarding fair-housing resources exists. Although Frisco continues to add apartments, low-income people have little chance of renting a unit. Figure 23 shows that more than 80% of Frisco residents have an annual income exceeding \$75k. The high rents reflect this, and rents in the City continue to increase.

3. R/ECAPs

a.

Describe the locations of R/ECAPs, if any, in the jurisdiction (and region, if applicable). Identify the protected class groups living in R/ECAPs and describe how R/ECAPs have changed over time.

HUD has defined a racially or ethnically concentrated area of poverty (R/ECAP) as a census tract in which 50% or more of the residents are non-white (including Hispanic) and over 40% of residents have incomes falling below the US federal poverty rate (appropriate to their family size and composition) (HUD, 2016). This section looks at the location of R/ECAP tracts between 1990 and 2015, both locally and throughout the Dallas-Fort Worth region.

R/ECAPs in Frisco

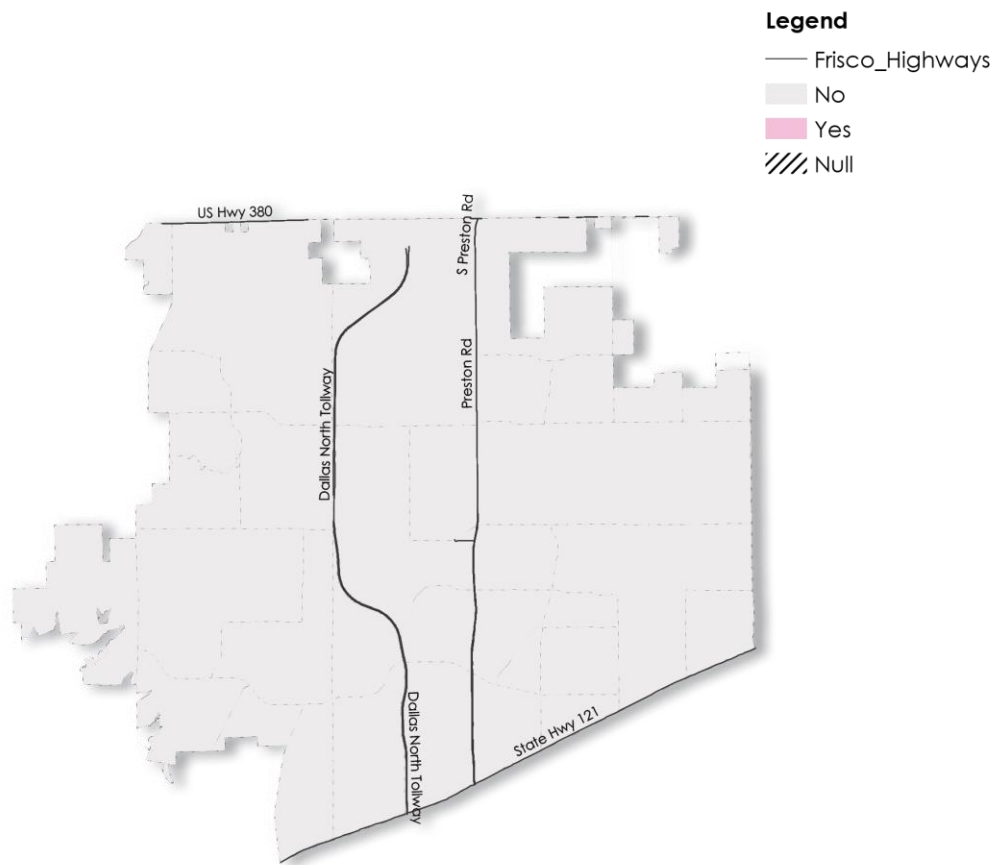


Figure 24: R/ECAP map for Frisco, 1990-2015 (American Community Survey and US Decennial Census)

No Frisco census tracts met the HUD definition of a R/ECAP at any point between 1990 and 2015.

R/ECAP Patterns in North Texas

For the region from 1990 to 2015, R/ECAP areas primarily appeared in Dallas County and Tarrant County. During this period, many R/ECAPs persisted in Dallas County near Fair Park and south Dallas near I-45 and US 175; in Tarrant County, southeast Fort Worth contains R/ECAPs from downtown to I-820. The exact census tracts designated as R/ECAPs during this period may fluctuate but poverty and segregation remain continuously present; furthermore, the R/ECAPs in southeast Fort Worth increased and expanded. In west Dallas, another isolated R/ECAP has existed for 25 years near Fish Trap Park and Rupert Park between the Trinity River and Fort Worth Avenue. In suburban Tarrant County, one R/ECAP has existed in Arlington near I-30 since 1990.

In 1990, R/ECAPs also occur just north of I-30 in Greenville. The Hunt County seat experiences fluctuations in the designation of its census tracts as R/ECAPs over the 25-year study period. In 2000, R/ECAPs disappear in Greenville, but in 2010 they reappear. In 2015, the Greenville R/ECAP disappears again, but R/ECAPs persist in Hunt County by appearing in Commerce.

In addition to these long-existing R/ECAPs, many Dallas R/ECAPs have appeared and persisted in other locations. In 2000, the first R/ECAP in north Dallas near Richardson north of I-635 and adjacent to US 75 developed. Since 2000, two new clusters in east Dallas have persisted: north of I-30 and east of Samuell Grand Park, and near the US 175-Loop 12 interchange. In 2010, the west Dallas R/ECAP experienced a small expansion; another cluster appeared in north Dallas east of US 75 between I-635 and Loop 12, and many other clusters developed near freeway interchanges in south and east Dallas: 1) I-35E and US 67, 2) I-35E and SH 180, and 3) Loop 12 and I-30. In 2015, a new R/ECAP cluster emerges in Oak Cliff and another develops north of I-635 and east of US 75 near Garland.

Fort Worth experienced more fluctuations in R/ECAP location from 1990 to 2015. In 2000, a R/ECAP first appears in the Lake Como area; the Como area does not appear as a R/ECAP in 2010, but the designation reappears in 2013 and 2015. Since 2010, an area north of SH 183 and south of I-820 near both I-35W and US 287 has experienced fluctuating designations; in 2015, an area between I-35W and US 287 along SH 183 persists. Since 2010, a R/ECAP has existed in an area near Texas Christian University, and in 2013, a R/ECAP developed in the area around the Naval Air Station.

Since 2010, more R/ECAPs have begun to appear in Dallas and Tarrant County suburbs. While some R/ECAPs existed in Irving in 2010 and 2013, they do not appear in 2015. At the same time, a R/ECAP appeared in Carrollton near I-35E and another appeared in north Desoto. In Garland, a R/ECAP developed in 2013 and expanded in 2015. Since 2010, the Tarrant County R/ECAPs have expanded to include central Arlington and west Grand Prairie near SH 360.

Outside Dallas and Tarrant counties, four other counties contain R/ECAPs. R/ECAPs have persisted in south Denton, the Denton County seat, since 2000. Hunt County has experienced fluctuations in its designated R/ECAPs since 1990, but in 2015, a new R/ECAP appeared in Commerce. In 2015, the first R/ECAP in Collin County appeared in Dallas near SH 190, and in Ellis County, its first R/ECAP appeared in Ennis. While the R/ECAPs in the region primarily occur in Dallas and Tarrant County, they have increased in number and spatial breadth from 1990-2015.

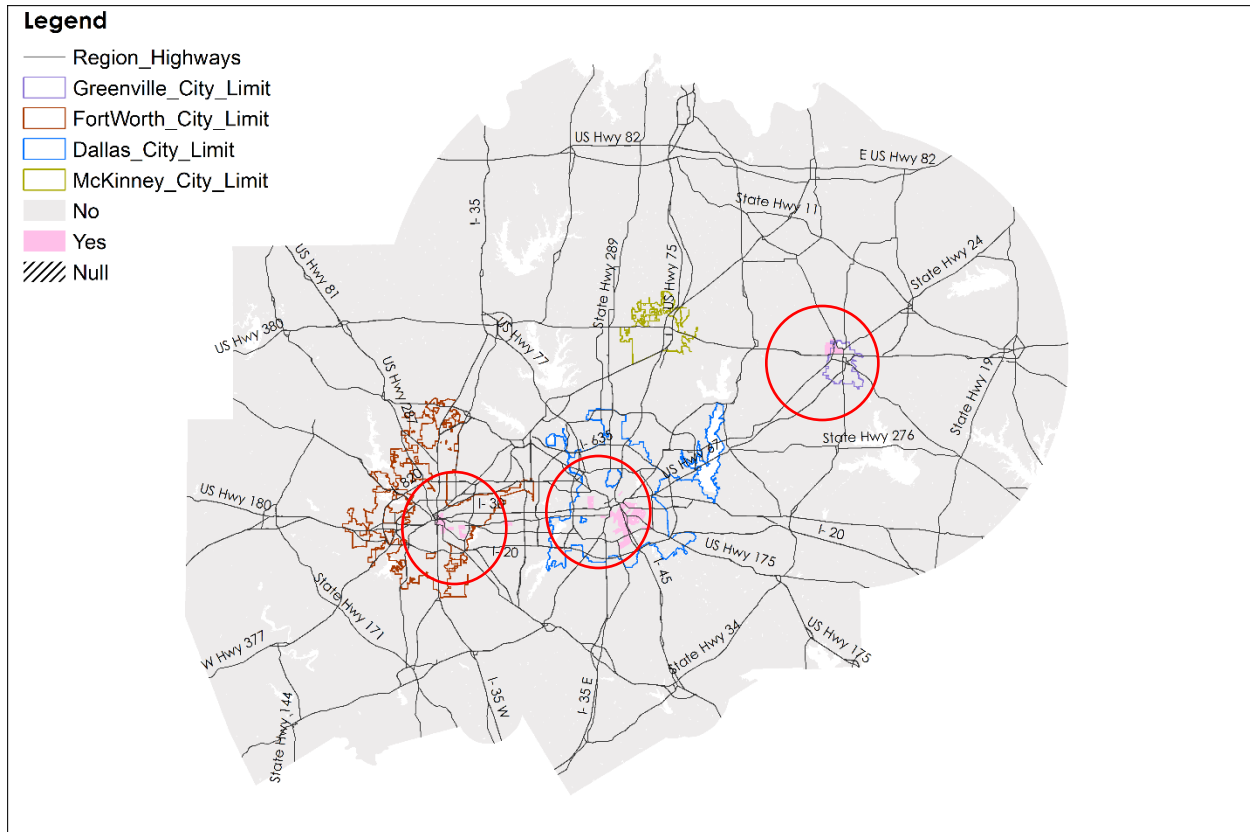


Figure 25: R/ECAPs Map of DFW Region in 1990, US Decennial Census 1990

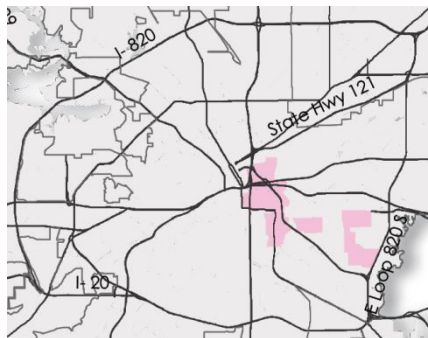


Figure 26: Fort Worth R/ECAPs, US Decennial Census

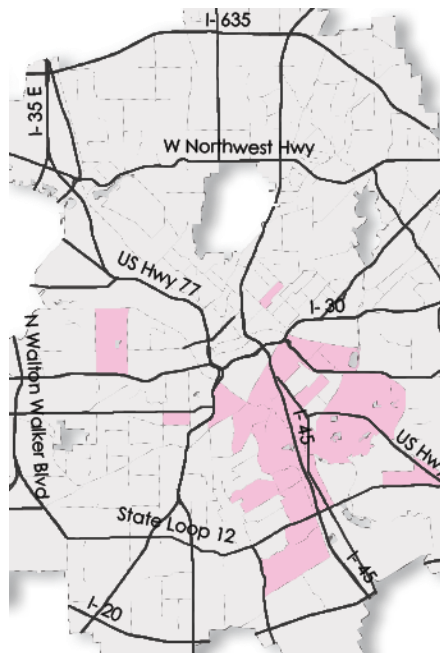


Figure 27: Dallas R/ECAPs, US Decennial Census 1990

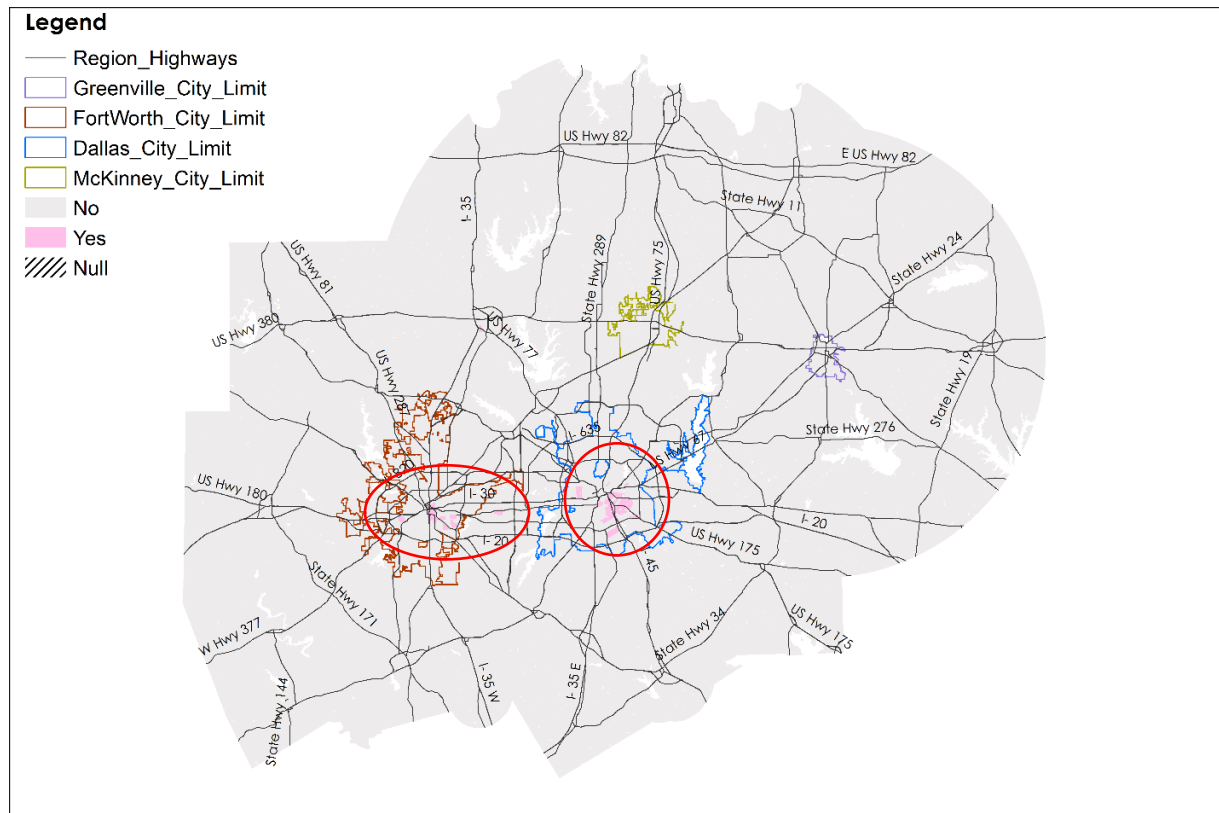


Figure 28: RECAPs Map of DFW Region in 2000, US Decennial Census 2000

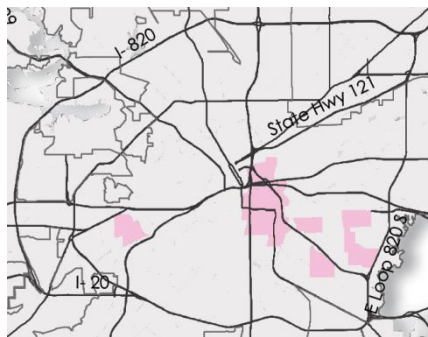


Figure 29: Fort Worth R/ECAPs, 2000

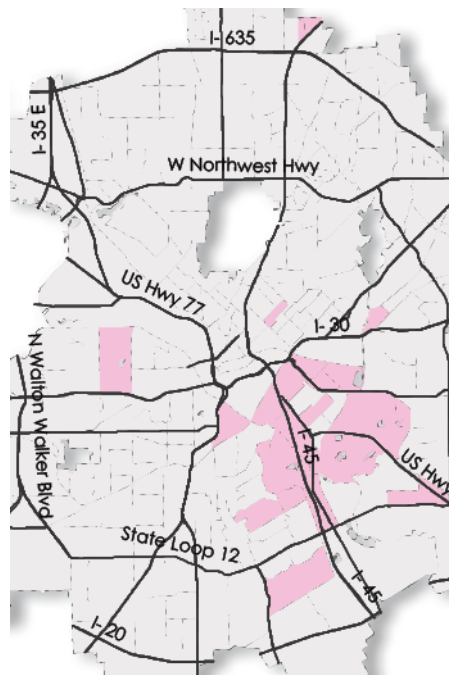


Figure 30: Dallas R/ECAPs, 2000, US Decennial Census 2000

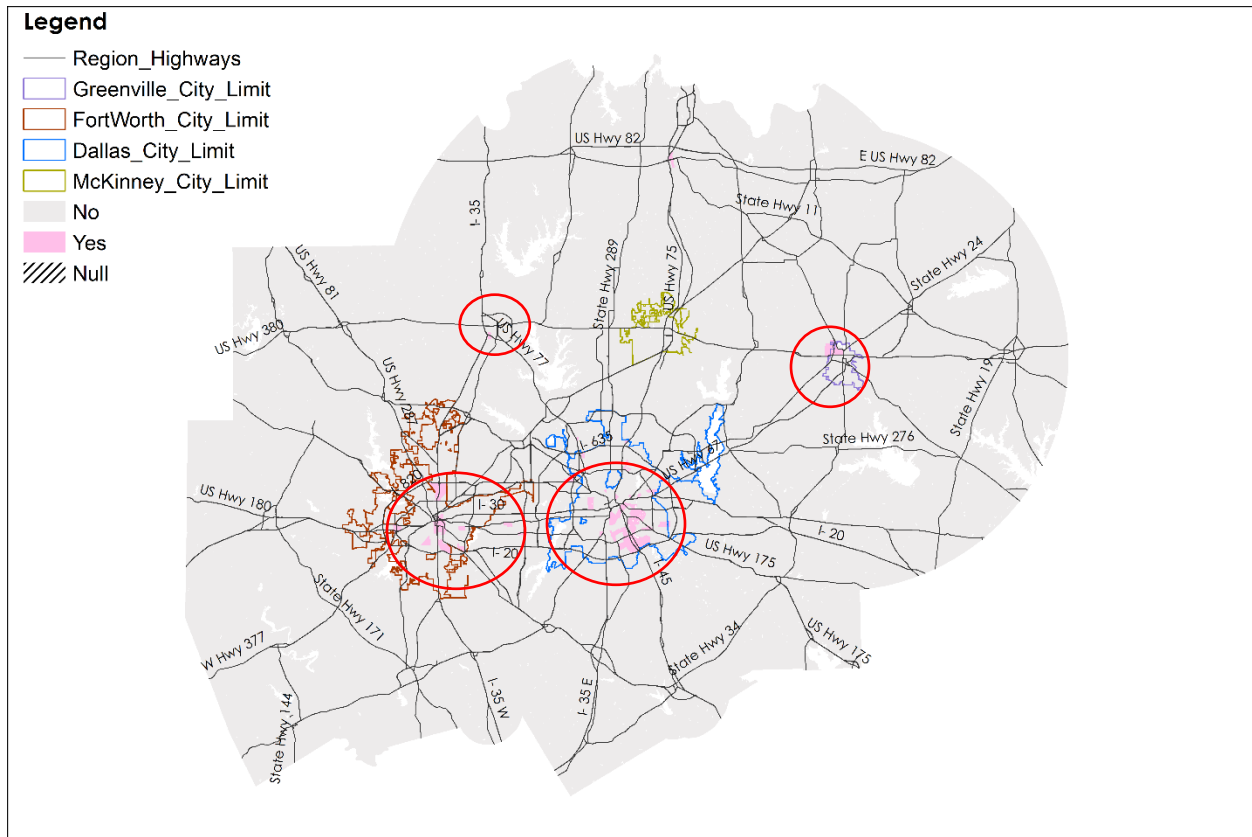


Figure 31: RECAPs Map of DFW Region in 2010, US Decennial Census 2010

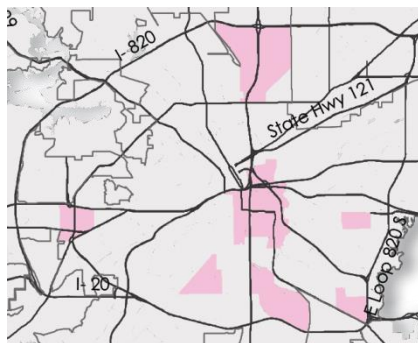


Figure 32: Fort Worth R/ECAPs, 2010

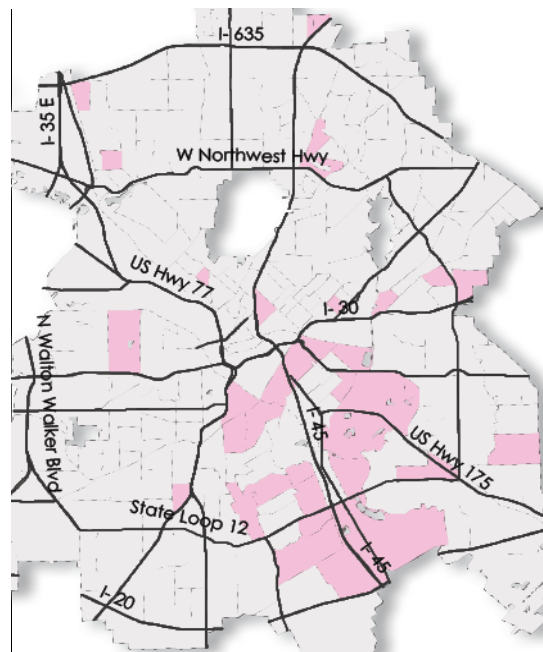


Figure 33: Dallas R/ECAPs, 2010, US Decennial Census 2010

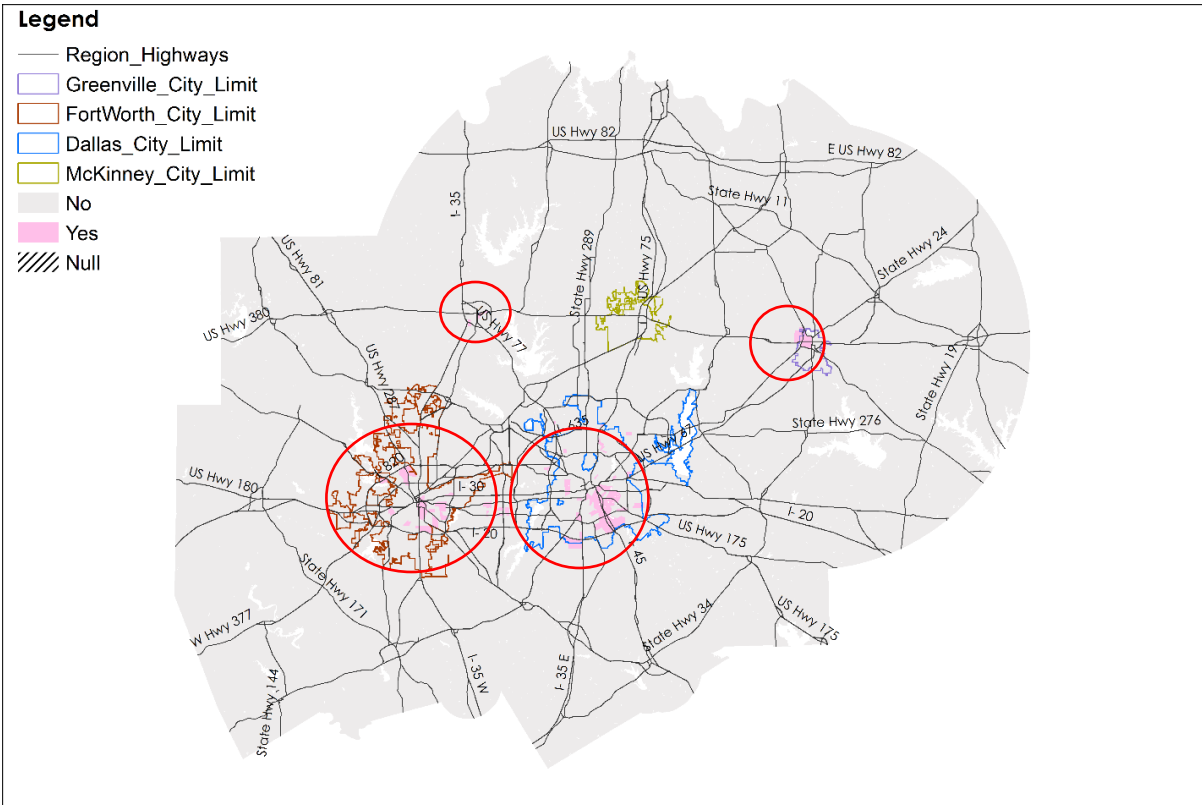


Figure 34: RECAPs Map of DFW Region in 2013, ACS 2013

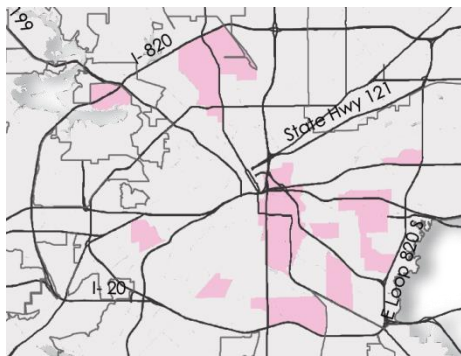


Figure 35: Fort Worth R/ECAPs, 2013

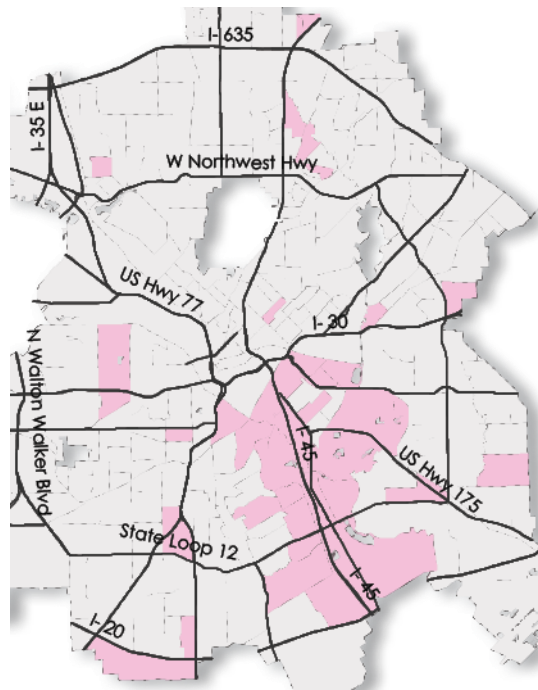


Figure 36: Dallas R/ECAPs, 2013, ACS 2013

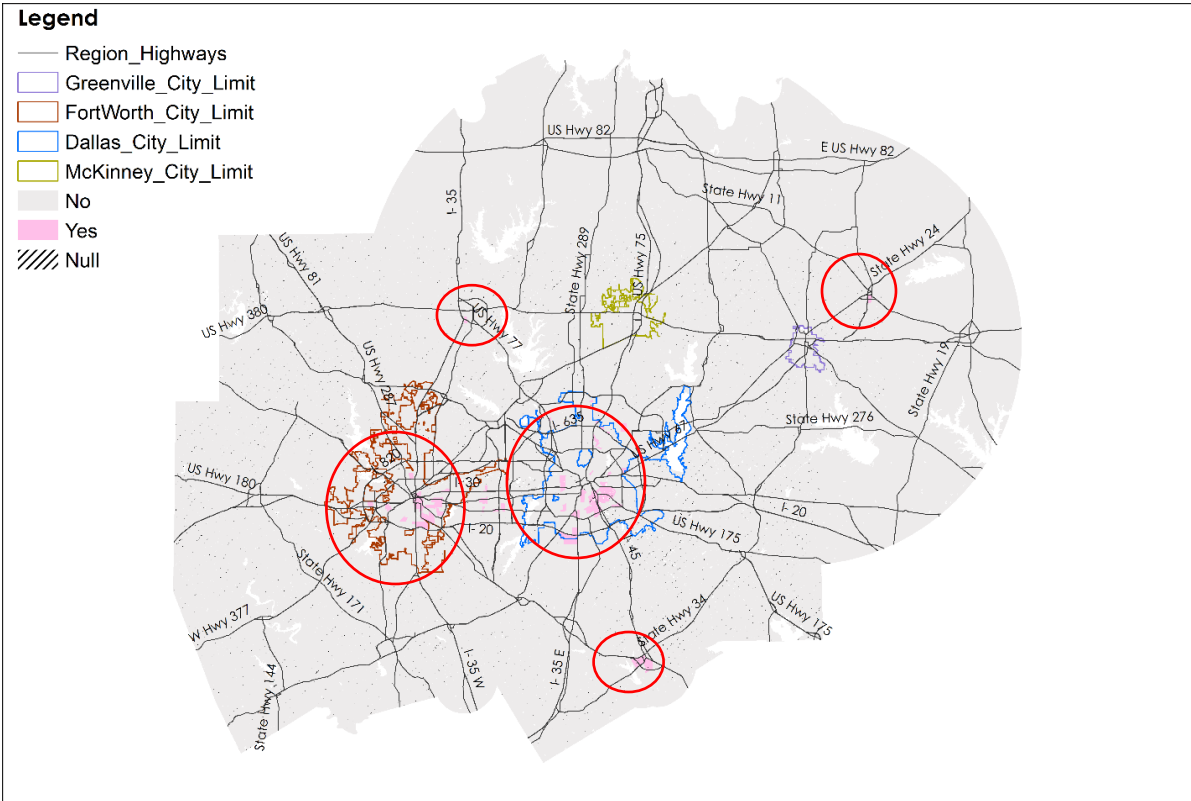


Figure 37: RECAPs Map of DFW Region in 2015, ACS 2015

4. Disparities in Access to Opportunity

- a.** Describe any disparities in access to the following opportunities for households in the jurisdiction (and region, if applicable), based on protected class:

Table 12 - Opportunity Indicators, by Race/Ethnicity

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
(Frisco, TX CDBG) Jurisdiction							
Total Population							
White, Non-Hispanic	85.16	89.67	92.72	41.38	44.38	41.57	N/a
Black, Non-Hispanic	83.53	87.75	92.27	41.42	45.55	41.68	N/a
Hispanic	78.09	85.65	90.99	41.88	48.61	44.91	N/a
Asian or Pacific Islander, Non-Hispanic	87.57	89.67	93.50	41.23	42.46	39.28	N/a
Native American, Non-Hispanic	83.36	88.87	91.95	41.60	47.27	44.54	N/a
Population below federal poverty line							
White, Non-Hispanic	69.19	81.27	89.16	44.09	55.77	50.56	N/a
Black, Non-Hispanic	89.09	86.56	93.37	41.49	35.33	37.12	N/a
Hispanic	66.46	76.25	88.97	43.67	54.32	49.33	N/a
Asian or Pacific Islander, Non-Hispanic	93.58	90.48	93.84	37.65	35.66	38.57	N/a
Native American, Non-Hispanic	57.28	79.39	85.96	40.58	58.09	54.13	N/a
(Dallas-Fort Worth-Arlington, TX) Region							
Total Population							
White, Non-Hispanic	64.62	63.42	67.57	42.14	51.91	50.10	33.02
Black, Non-Hispanic	40.78	41.28	47.59	48.17	60.55	44.28	29.40
Hispanic	37.25	42.70	45.75	48.70	61.74	47.18	29.86
Asian or Pacific Islander, Non-Hispanic	66.83	64.84	74.36	48.94	60.65	48.35	33.45
Native American, Non-Hispanic	56.41	55.58	59.73	43.05	53.41	49.43	32.51
Population below federal poverty line							
White, Non-Hispanic	48.24	53.19	53.86	44.63	57.02	52.01	31.42
Black, Non-Hispanic	24.15	34.16	33.43	51.04	65.56	45.27	27.00
Hispanic	25.63	38.76	38.58	51.35	65.99	48.95	28.30
Asian or Pacific Islander, Non-Hispanic	51.26	55.69	60.78	52.22	67.80	51.48	30.06
Native American, Non-Hispanic	35.38	42.47	43.31	46.44	60.60	55.88	29.75

Figure 38: Opportunity indicators by race/ethnicity in Frisco and region, HUD-provided data

Low poverty exposure opportunities

The low poverty index captures poverty in a given neighborhood. Its values are inverted and percentile-ranked nationally. Values range from 0 to 100. As the score increases, the exposure to poverty decreases.

According to HUD Table 12 (Figure 38), the index values in both the region and Frisco, all groups within Frisco remain more likely to live in neighborhoods with low poverty exposure than their counterparts elsewhere in the region. The Frisco population groups living below the poverty line experience lower exposure to poverty than the corresponding overall regional population, and these population groups (except Native American) also have lower exposure than the overall regional white population. In Frisco, the black and Asian/PI populations below the poverty line both have lower exposure to poverty than the overall black and Asian/PI populations in Frisco. Poverty appears to affect the Native American population most of all in Frisco (26-point decrease) and the white population next (20-point decrease). Within Frisco, the overall Hispanic population experiences the highest exposure to poverty. The black population in Frisco experiences the greatest improvement over its regional counterparts. Once again, even the lowest low poverty index values in Frisco remain well above regional norms.

The poverty index map in Figure 39 reflects the city's relative affluence and relatively small population living below the poverty line. Only one census tract, located in central Frisco and

corresponding with a concentration of LEP and Hispanic residents, scores less than 60 on the index. Frisco appears to be one of the cities least exposed to poverty in the DFW metroplex.

As mentioned in the Segregation section (IV. 2. B), the refusal to accept HCVs in market-rate apartment complexes creates a big barrier for low-income individuals to settle in Frisco. Considerable housing development continues in the Frisco area, with mid-sized Fortune 1000 companies moving to Frisco and sparking further residential growth (Basnet, 2018).

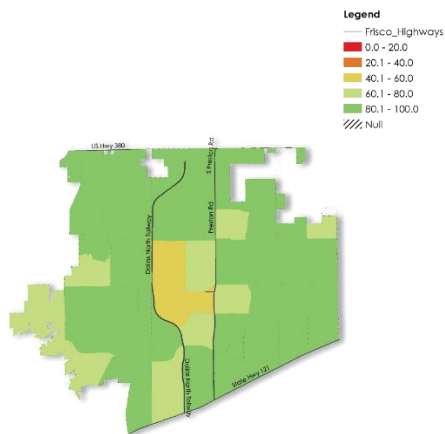


Figure 39: Low Poverty Index map for Frisco, ACS 2013

Educational opportunity

Four school districts serve Frisco residents (Figure 40) — Frisco, Prosper, Lewisville and Little Elm Independent School Districts (ISDs). As per the Texas academic performance report, Frisco ISD served 55,745 students in academic year 2016-2017; 47.7% were white, 23.9% Asian, 13.6% Hispanic, 10.5% African-American, 3.6% two or more races, and 0.1% Pacific Islander. Of the total, 8.6% (4,286) were students with disabilities and 10.5% (5,862) were economically disadvantaged (TEA, 2016).

Frisco ISD has experienced phenomenal growth. The district has added more than 3,000 students each year for the past ten years. "The District has grown considerably since the early 1990s and typically adds 2,500-3,500 students each year. To put that in perspective, consider these statistics: in 1993, FISD had approximately 1,933 students who attended four schools. Today, the

District serves more than 58,000 students in 68 schools. On a percentage basis, no school district in the country grew faster than FISD from 1990-91 to 2010-11" (FISD, 2018).

Education represents an important component in molding the ability to make contributions to one's community, as well as to gain access to a better life. Many people move to Frisco for the schools. However, "the school district is also seeing the effects of rising housing costs. For years, Frisco ISD's highest enrollment has come from its elementary school population. Next year, that trend is expected to shift to the middle school and high school populations" (Community Impact, 2017).

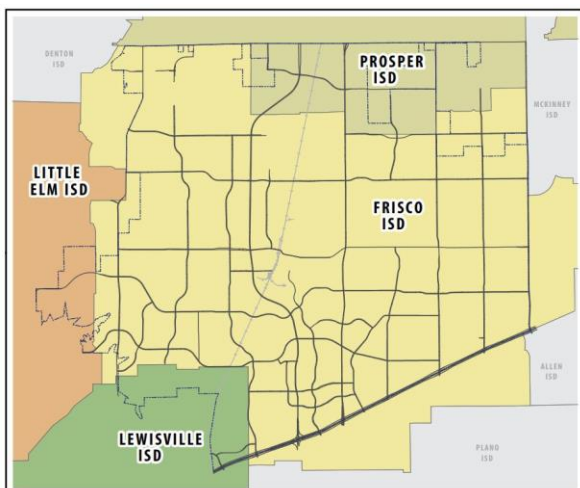


Figure 40 School Districts Serving Frisco Residents, City of Frisco 2015

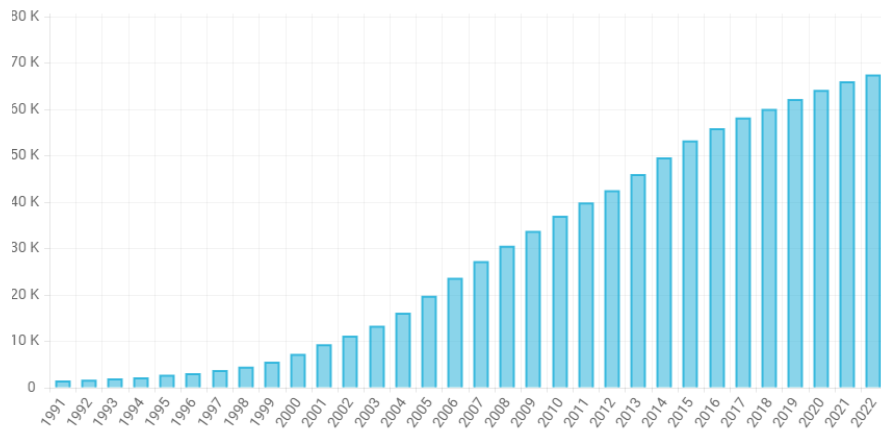


Figure 41: School enrollment in Frisco ISD, historical and estimates, City of Frisco 2015

The quality of a neighborhood matters for shaping outcomes, including both families and children (Ellen & Turner, 2010). High housing costs seem to be a big impediment for low-income individuals living in Frisco, but school transportation issues could be another factor. On Frisco ISD's enrollment application, one of the criteria includes a need for proof of residency in that area as it does not accept out-of-district transfers. Frisco ISD provides bus transportation for students in the ESL and bilingual programs, in Pre-K, in Head Start and a preschool program for children with disabilities; otherwise, the ISD provides no school bus service for students living within two miles of the school, which is typical of all districts in Texas. This two-mile radius from the school seems to be a reason for some portions of the population having difficulty enrolling their kids in school. In addition, Frisco ISD has clearly stated in its website, "Parents whose transfer requests are approved will be responsible for providing transportation to and from the campus." This is potentially a problem for both low-income residents whose job status is precarious and any members of the population without a car. This is a matter of concern for young families with elementary-age kids.

The changes in land use articulated in Frisco's 2015 Comprehensive Plan also impact the area's school districts. The City's analysis shows that the impact of the change in the land use plan has reduced the number of students enrolled in Frisco ISD and Prosper ISD (pp 125-126). The Dallas Morning News reported in February 2017 that Frisco ISD was dealing with a budget shortfall brought on by a loss of state funding combined with voter rejection of a tax rate hike. "The district currently has four schools under construction: Memorial High School, Lawler Middle School, and Talley and Liscano elementary schools. Those schools were supposed to open this fall, but the district has decided they will remain closed for the 2017-18 school year to save about \$15 million in operating and staffing costs." Recommendations for reducing expenses include pay to play for athletes and adding extra stops on the two-mile bus routes (Wigglesworth, 2017). Such a shortfall might further influence land use choices and the residents able to fully access Frisco's schools.

The school proficiency index uses school-level data on the performance of fourth-grade students on state exams to rate the schools in a neighborhood. High scores mean better schools. According to HUD Table 12 (Figure 38), the index values in both the region and Frisco, all groups within Frisco remain more likely to live in neighborhoods with high school proficiency index scores

than their counterparts elsewhere in the region. The Frisco population groups living below the poverty line experience higher school proficiency scores than the corresponding overall regional populations and the overall regional white population. Poverty appears to affect the Native American and Hispanic populations most of all (10-point decrease) in Frisco. The black population in Frisco experiences the greatest improvement over its regional counterparts. Once again, even the lowest school proficiency index values in Frisco remain well above regional norms.

As per HUD-provided data shown in Figure 42, the school proficiency index map shows that Frisco provides good educational opportunities for residents. Almost all portions of Frisco achieved scores of at least 60. Two census tracts near central Frisco perform significantly poorer than the rest of Frisco; however, these neighborhoods have Asian/PI and white concentrations rather than any of the other protected classes. There is little evidence of any differences in school quality based on the school district boundaries in Figure 42.

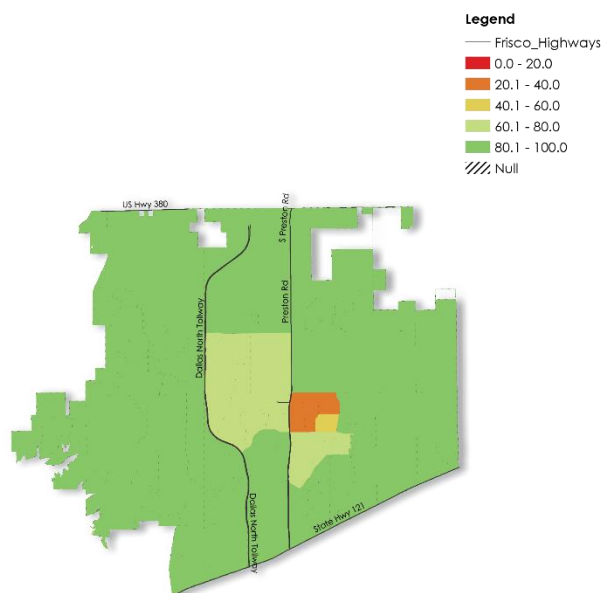


Figure 42: School proficiency index for Frisco, Great Schools data

Employment opportunities

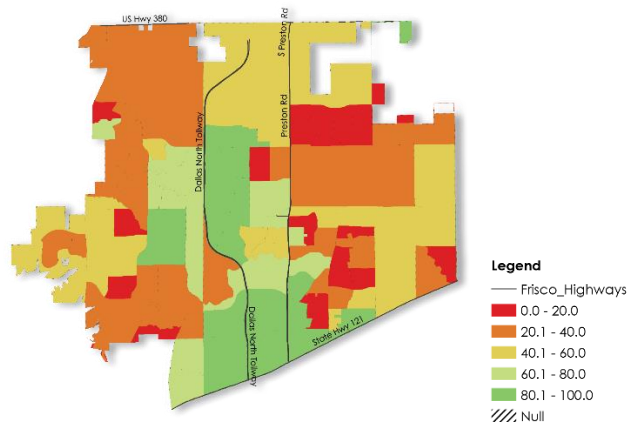


Figure 43: Jobs proximity index for Frisco, ACS 2013

The jobs proximity index uses high scores to indicate high access to jobs. According to HUD Table 12 (Figure 38), the index values in both the region and Frisco, all groups within Frisco remain more likely to live in neighborhoods with lower jobs proximity index scores than their counterparts elsewhere in the region; however, this does not accurately reflect the job growth occurring in Frisco and other nearby cities.

Areas across Frisco scored very differently here, with scores of 80-100 in some areas. The higher scoring neighborhoods tend to be along SH 121 or Dallas North Tollway. Scattered clusters in east and west Frisco have lower scores; these neighborhoods correspond with primarily residential portions of Frisco.

High housing prices seem to be hindering the ability to access opportunities in Frisco. Employers aim to lure workers from other cities through benefits and competitive salaries. But as stated in public meetings, rising housing costs in Frisco cause low- and moderate-income employees to live far from their workplace. As per the Community Impact Newspaper published July 10, 2017, Frisco employers struggle to find employees on a consistent basis, which sometimes affects the services offered. Frisco's Future Land Use Plan suggests that some future mixed-use developments may offer additional workforce housing. The map (Figure 44) shows these new constructions concentrate in the central portions of the City and to the south. Few commercial developments appear targeted for east Frisco.

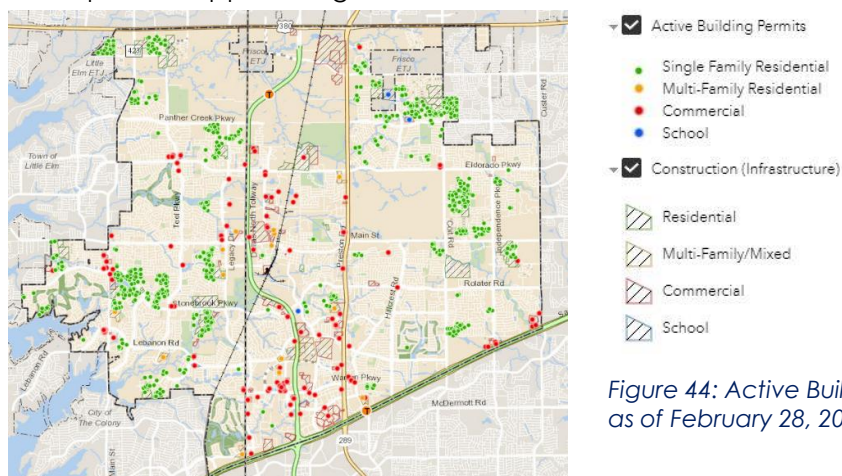


Figure 44: Active Building permits and Current construction in Frisco as of February 28, 2018, City of Frisco

The City of Frisco offers a Down Payment Assistance Program. Families with at least one adult working full time with the City of Frisco or Frisco ISD with a low to moderate income who are qualifying first-time homebuyers in Frisco are able to get loans from a Targeted Down Payment Assistance Program. The program provides forgivable loans of up to \$10,000 for the purpose of down payment and closing cost assistance. This serves to support City of Frisco and Frisco ISD employees to move into the Frisco area. However, some current challenges with this program exist. As Frisco has experienced exponential growth, "this program, which was set prior to the large boom that Frisco is currently experiencing, cannot meet the needs of those it was intended to help (teachers and public servants for residents). It was intended to help with house prices in the \$400K-\$500K range (average); however, the City is not handing out loans to people purchasing homes for that amount. It is just unfortunate that Frisco has 1-bedroom condominiums going up in the City of Frisco that are in the \$650K range, and Frisco's moderately paid public servants cannot afford to live here. The criteria of this program are an income limit of \$123,055 with a max house price of \$362,250. People cannot find a home for that price in this city. There are a few houses built in the 1980s that are selling in the \$280s but not all homebuyers want to or like to buy them" (City of Frisco, 2018).

The labor market engagement (LME) index provides a description of the relative intensity of labor market engagement and human capital in a neighborhood. The values represent the percentile of each census tract's score ranked nationally with a range from 0 to 100. As the labor market engagement index score increases, the labor force participation and human capital in a neighborhood appear stronger.

According to HUD Table 12 (Figure 38), the index values in both the region and Frisco, all groups within Frisco remain more likely to live in neighborhoods with high labor market index scores than their counterparts elsewhere in the region. The Frisco population groups living below the poverty line experience higher LME index scores than the corresponding overall regional population groups, and the overall regional white population. Poverty has little effect on the LME scores in Frisco. The black and Hispanic populations in Frisco experience the greatest improvement over their regional counterparts. Once again, even the lowest labor market engagement index values in Frisco remain well above regional norms.

Transportation opportunities

Frisco has limited public transportation. The Texoma Area Paratransit System (TAPS) and the Denton County Transportation Authority (DCTA) offer service to Frisco residents who are 65 years of age and older, disabled and/or require transportation for medical purposes. Trips must be scheduled in advance. To schedule with DCTA's customer service team, one must call between Monday and Friday from 5 AM to 7PM and at least 24 hours in advance. No weekend service is available. As mentioned in the Education section, service is also available for students in certain circumstances.

Since 2005, Frisco Shuttle has provided service to the area's schools at nine stops. Frisco Shuttle vehicles feature passenger side doors for curbside pickup and drop-off. Prices for using the service vary (Figure 45). Hours are 1-5 p.m. Monday-Friday during the school year. For monthly plans, there is an annual household membership fee of \$35. Discounts are available for siblings and teachers.

Frisco Shuttle - Schools Pricing			
	Daily	Weekly	Monthly*
One-Way	\$15	\$60	\$185
Round-Trip	N/A	N/A	N/A

Frisco Shuttle - Schools Hours			

Figure 45: Frisco Shuttle school pricing, Frisco Shuttle 2018

Frisco Shuttle also serves DFW International Airport, DART rail connections and Amtrak/Greyhound stations but has a cost is \$15 per day, which might be too high for the low-income population. Local destination services are very limited; service is only on weekdays and advanced reservations are required. The costs for the service are \$15.95 for those 18 or older, \$7.95 for individuals 5-17, and free for anyone 4 and under.

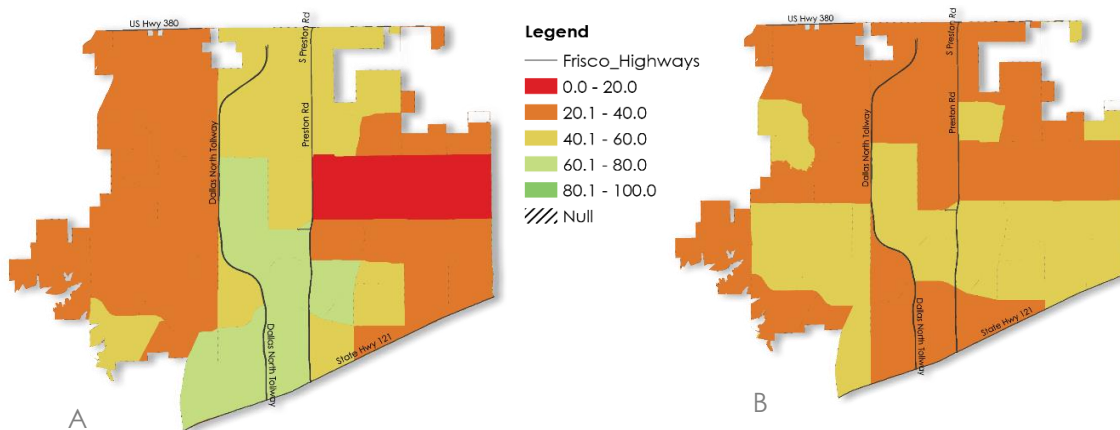


Figure 46: A) Low Transportation Cost Index and B) Transit trip Index for Frisco (HUD, LAI 2012 and U.S. 2010 Decennial Census)

The Low Transportation Cost Index is based on estimates for a three-person, single-parent family with income at 50% of the median income for renters in the region. Values are inverted and percentile ranked nationally; as the index value increases, the cost of transportation decreases. Figure 46a shows better transportation cost index scores for census tract in central and south Frisco, near the North Dallas Tollway. Poorer scores are evident in both east and west Frisco.

According to HUD Table 12 (Figure 38), the index values in both the region and Frisco, all groups within Frisco remain more likely to live in neighborhoods with poorer low transportation cost index scores than their counterparts elsewhere in the region.

The transit trip (TT) index estimates the number of transit trips taken by a three-person, single-parent family with income at 50% of the median income for renters in the region. Scores are compared with a national distribution and range from 0 to 100. As the TT index increases, residents in that neighborhood appear more likely to utilize public transit (if available). The index controls for income such that a higher index value will often reflect better access to public

transit. According to HUD Table 12 (Figure 38), the index values in both the region and Frisco, all groups within Frisco remain more likely to live in neighborhoods with poorer TT index scores than their counterparts elsewhere in the region. Figure 46b indicates greater likelihood of transit usage throughout southern Frisco.

A transportation congestion issue exists in Frisco, as shown in Figure 47. Frisco features more residential property than commercial or mixed use, and a senior planner noted that most residents drive outside the City for employment, especially along Preston Road (SH 289). With accelerated apartment construction, traffic congestion could worsen and negatively impact Frisco's transportation congestion. This may also lead to extra expenditures for the area's low- and moderate-income individuals who travel to and from Frisco (Community Impact, 2017).

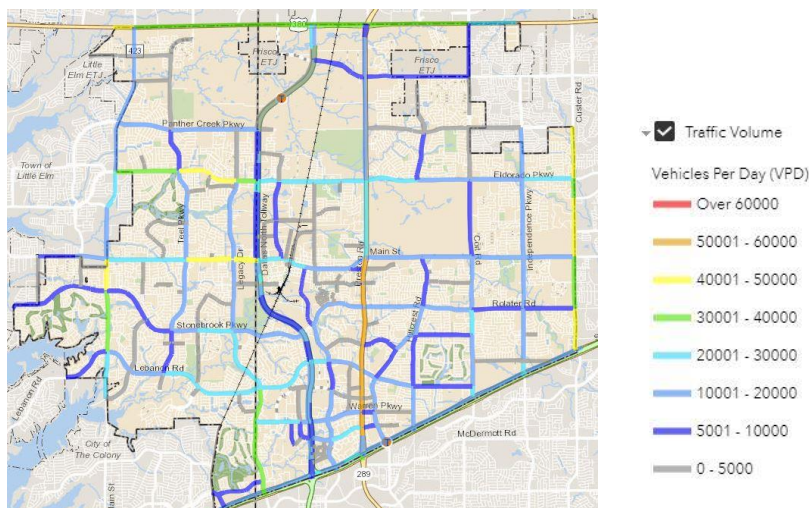


Figure 47: Traffic congestion map for Frisco, City of Frisco 2018

5. Disproportionate Housing Need

- a.** Describe which protected class groups in the jurisdiction (and region, if applicable) experience higher rates of housing problems (housing cost burden, severe housing cost burden, substandard housing conditions, and overcrowding).

The following figure shows the percentage of race/ethnicity groups experiencing one of four **housing problems: housing cost burden** (defined as paying more than 30% of income for monthly housing costs, including utilities), **overcrowding** (more than one person per room), **lacking a complete kitchen**, or **lacking plumbing**. Figure 48 presents the same data for **severe housing cost burden**, which is paying more than **50% of income for monthly housing costs** including utilities. Figure 49 has an additional section that shows the severe burden, which replaces regular (30%) cost burden with the severe (50%) cost burden while keeping the other burdens the same.

Race/Ethnicity

HUD data indicates that over 26% of Frisco households experience some housing problems. Of that number, Hispanic households incur the highest rate, followed by those classified as other, Native American and then black residents. The proportion of households with housing problems remains higher in the region than within Frisco for most groups; however, a similar pattern persists where most races and ethnicities experience more housing problems than white households within the region, even within Frisco. Frisco's Asian/PI population breaks this pattern and actually has a lower percentage of housing problems than white households.

DFW
Region
Frisco

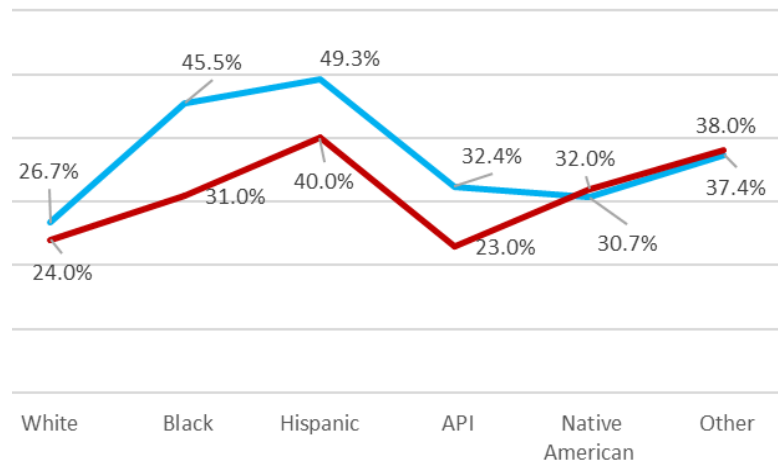


Figure 48: Housing problems by race, DFW Region and Frisco, US Decennial Census and HUD

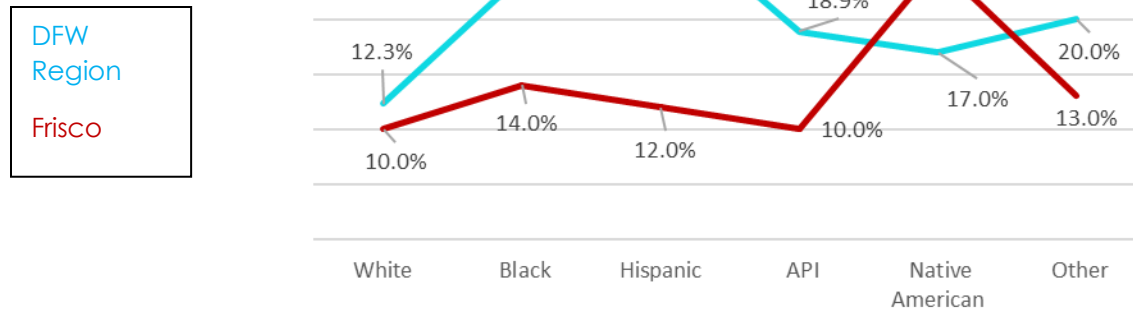


Figure 509: Severe housing problems by race, DFW Region and Frisco, US Decennial Census and HUD

Severe housing problems also appear less prevalent in Frisco than elsewhere in the region (Figure 49). Native Americans experience a higher rate of severe housing problems in Frisco than their regional counterparts, and they easily incur the highest rate of severe housing problems of any group in Frisco. Black households represent the second highest group, at about 14% of their population in Frisco, which remains considerably below the 24% of black households who suffer severe housing problems throughout the region. Hispanic households incur a slightly lower rate of severe housing problems (12%), also far below the regional total for that group. White households in Frisco incur severe housing problems at a comparable but slightly lower rate (10%) than white households throughout the region (12%).

Housing cost represents a major concern for the low-income population in Frisco, as expressed during public meetings. Again, the data shows that a high proportion of the Native American population (25%) incurs severe cost burden (Figure 50). This means that one in four Native American households pays more than 50% of its income for housing. By comparison, 12% of black households in Frisco incur severe cost burden, but 21% of the regional black households experience severe cost burden. About 9% of white, Hispanic, and Asian/PI households suffer severe cost burden in Frisco. As with most other statistics, the rate of severe cost burden remains far lower in Frisco than elsewhere in the region.

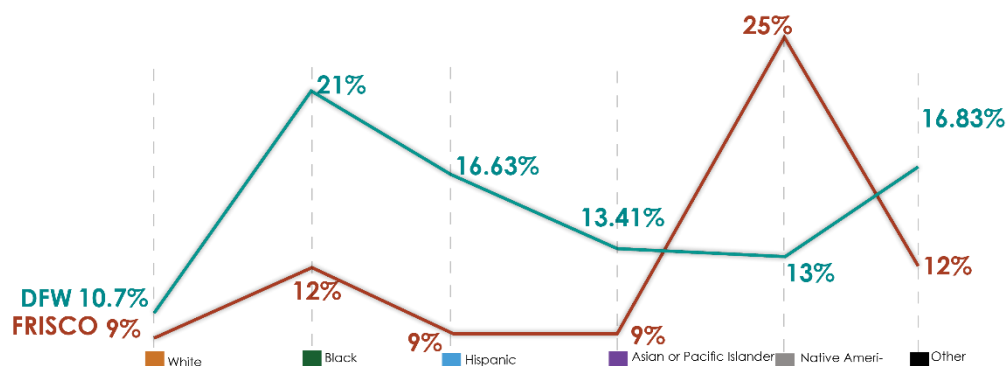


Figure 51 Severe cost burden by race for the DFW Region and Frisco, US Decennial Census and HUD

Household type



Figure 52: Housing Problem by household type and size for the DFW Region and City of Frisco, US Decennial census and HUD

Looking at housing problems by household type and size (Figure 51), non-family households experience the highest rate in Frisco, at roughly 38%, which remains lower than in the DFW region as a whole. Families with five or more members in the region as a whole (50%) appear more than twice as likely to incur housing problems than in Frisco alone (24%). In both the DFW region (28%) and Frisco (23%), families with fewer than five members seem the least likely to suffer housing problems.

Geography of housing and housing issues in Frisco

Figure 52 shows the location of various types of housing burden inside Frisco, as well as the location of homeowners and renters; the display includes overall and by racial group. Although severe cost burden and severe housing problem households are evenly distributed (0%-20% in each census tract), some concentrations of households in south Frisco experience one of the four housing problems (at rates between 40% and 60%) in census tracts that have high rental percentages. Homeowners significantly outnumber renters throughout most of Frisco, and the rate of home ownership in Frisco remains higher than elsewhere in the region. Most of Frisco's white households (74%) are homeowners. Rental households in Frisco primarily concentrate in the southern Dallas North Tollway and Preston Road (SH 289) corridors. The white population does not experience significantly high rates of housing problems anywhere in Frisco while all other population groups experience high rates of housing problems. Most of these concentrations for the population groups occur in the census tracts with higher percentages of rental households.

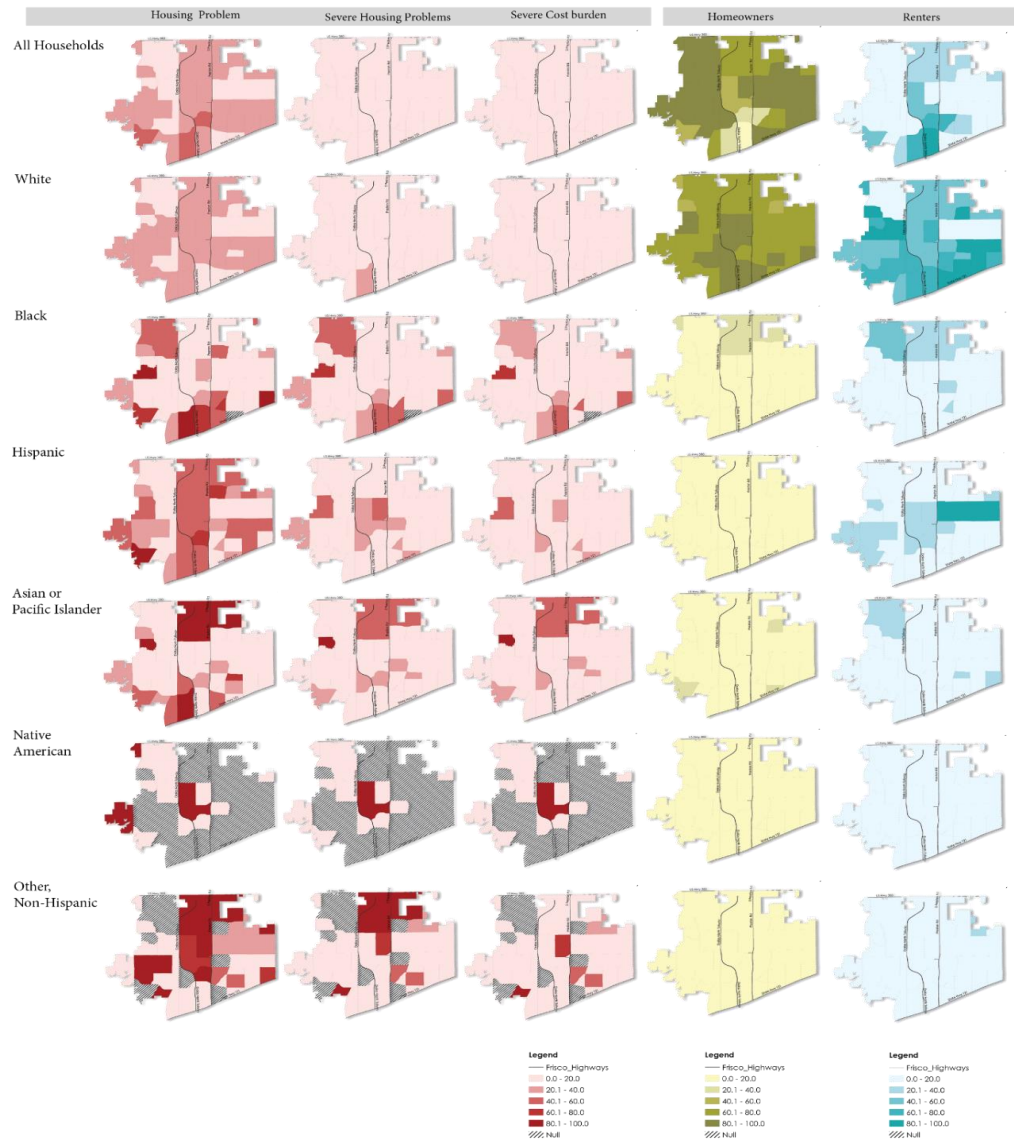


Figure 53: Various housing needs within Frisco, US Decennial Census

Figure 53 demonstrates the break points for 2014 HUD Area Median Family Income (HAMFI) ranges and the Frisco households within each range that experienced some cost burden. Almost three out of four households below 30% of HAMFI experienced severe cost burden. This included 1,160 households that had less than \$20,370 in income. The figures in this income band for renter households alone show a similar range, i.e. 73% of Frisco's renters who were below 30% of HAMFI experienced severe cost burden. About 37% of renter households incurred cost burden, more than twice the figure for homeowners, which was just under 18%.

Income ranges (2014)	# of Households Cost Burden > 50%	% Cost Burden > 50% at each income level	# of Households Cost burden > 30% to 50%	% Cost Burden > 30% to 50% at each income level	# of Households Not Cost Burdened	% Households Not Cost Burdened	Total Households
0 to \$20,370	1,160	73.0%	95	6.0%	335	21.1%	1,590
\$20,371 to \$33,950	1,260	56.3%	675	30.1%	305	13.6%	2,240
\$33,951 to \$54,320	785	19.6%	2,100	52.5%	1,115	27.9%	4,000
\$54,321 to \$67,899	245	9.3%	965	36.6%	1,430	54.2%	2,640
\$67,900 or more	395	1.1%	2,615	7.5%	31,975	91.4%	34,985
	3,845	8.5%	6,450	14.2%	35,160	77.4%	45,455
							Total Renters
0 to \$20,370	625	72.3%	80	9.2%	160	18.5%	865
\$20,371 to \$33,950	765	58.4%	490	37.4%	55	4.2%	1,310
\$33,951 to \$54,320	165	8.5%	1,280	66.1%	490	25.3%	1,935
\$54,321 to \$67,899	20	0.0%	350	0.0%	635	0.0%	1,005
\$67,900 or more	110	1.7%	360	5.7%	5,830	92.5%	6,300
	1,685	14.8%	2,560	22.4%	7,170	62.8%	11,415
							Total Owners
0 to \$20,370	540	74.5%	15	2.1%	170	23.4%	725
\$20,371 to \$33,950	495	53.2%	185	19.9%	250	26.9%	930
\$33,951 to \$54,320	620	30.0%	820	39.7%	625	30.3%	2,065
\$54,321 to \$67,899	225	13.8%	615	37.6%	795	48.6%	1,635
\$67,900 or more	285	1.0%	2,250	7.8%	26,150	91.2%	28,685
	2,165	6.4%	3,885	11.4%	27,990	82.2%	34,040

Figure 54: Cost burden by income level for Frisco, 2014 Comprehensive Housing Affordability Strategy

Homeless population

According to the 2017 Collin County homeless census report, 443 persons were homeless (Collin County Homeless Coalition, 2017). Of the unsheltered population, 13% were children. Half of the survey respondents were white (58% unsheltered) and 38% were black. One hundred five were Hispanic. Of the school districts surveyed — Allen, Frisco, McKinney, Plano and Wylie — Frisco and Wylie saw an increase in homeless students. Frisco ISD reported 85.

6. Contributing Factors of Segregation, R/ECAPS, Disparities in Access to Opportunity, and Disproportionate Housing Needs

Contributing Factors to Segregation and R/ECAPS

Neither segregation nor R/ECAPS came up frequently over the course of public meetings and focus groups in Frisco. The City of Frisco believes that the planning process has the potential to desegregate the area and to provide different housing types for all populations (Santarino & Jonathan, 2017). Segregation appears more relevant in a regional context because Frisco remains largely white and upper income. Efforts toward regional desegregation require greater regional collaboration.

Contributing Factors to Access to Opportunity

Of comments received via public events and interviews, about half (56%) concerned access to opportunities.

Location and type of affordable housing, lack of access to opportunity due to high housing costs, and loss of affordable housing represent significant factors curtailing access to opportunity. A Frisco senior planner said that even with housing options expanding, low-income residents will need private transportation. In addition, the surrounding, predominantly residential areas provide few employment opportunities. The City remains cognizant of difficulties arising from high housing costs, but this remains a difficult issue. The need for housing for the middle and working class represents an important issue for Frisco's future.

Availability, type, frequency and reliability of public transportation represents another impediment to accessing opportunity. Commenters praised Uber, but not everyone can afford Uber. Affordable transportation remains noticeably absent. Frisco's rapid growth has made the City aware of the challenge. Public participation recognized the impossibility of living in Frisco without a private vehicle.

Lack of investment in specific neighborhoods, public and private, comes in third as a contributing factor to access to opportunity. Student, teacher and low-income commenters would like to see more social services, like a library or recreation centers. Young families move to Frisco for jobs, but child care costs and school district requirements may dissuade them from moving. Some commenters also noted the importance of a walkable community, more entertainment venues, more parks, less traffic congestion and emergency services to help families during a time of crisis.

Private-sector discrimination represents another potential concern for the public.

Contributing Factors to Disproportionate Housing Needs

Availability of affordable units in a range of sizes, loss of affordable housing, lack of access to opportunity due to high housing costs, and displacement of residents due to economic pressures represented contributing factors mentioned by several individuals regarding the presence of disproportionate housing needs. One of the participants in a public meeting mentioned that some beautiful apartments remain cheaper but they have poor-quality construction, mold and thin walls. Another participant noted that a one-bedroom in Frisco Square has a very high rent — mid-\$900s to \$1,200, which seems prohibitive for much of the population. Respondents also said that having children makes a budget (including housing) more expensive. One individual said 25% of income is supposed to go for housing but she pays 50%.

7. Publicly Supported Housing Section

a. Publicly Supported Housing Demographics and Policies

i. Compare the demographic populations by protected class group of residents living in each category of publicly supported housing with the demographics of the population in general in the jurisdiction (and region, if applicable). Are certain protected class groups more likely to be residing in one program category of publicly supported housing than other program categories?

The Frisco Housing Authority has only 20 units of public housing, known as the Frisco Villas. Hispanic households occupy 70% of these units, black households occupy 20%, and white households live in 10% of the units. No Asian/Pis live In Frisco public housing at this time. Fifty-five percent (11) of the 20 households have children, 25% have elderly residents, and 5% have persons with disabilities. Besides Frisco Villas, three tax credit properties and two senior tax credit properties appear near Frisco.

Tax Credit Properties

- North Court Villas: 1-3 bedrooms, 134 units
- Stonebrook Village: 1-3 bedrooms, 216 units
- Preston Trace Apartments: 1-2 bedrooms, 40 units

Senior Tax Credit Properties Near Frisco

- Country Lane Senior Community
- Lakeside Manor

(Frisco, TX CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	2	10.00%	4	20.00%	14	70.00%	0	0.00%
Project-Based Section 8	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	6	5.88%	90	88.24%	3	2.94%	2	1.96%

Figure 55: Publicly supported housing by race/ethnicity for Frisco (HUD, US Census, and CHAS data)

Figure 54 illustrates the demographics of publicly supported housing categories in Frisco. A limited number (101) of HCV users live in Frisco, and black residents constitute nearly 90% of those households. All other races account for a lower percentage of HCV users than their overall representation within the population. White households represent less than 6% of those utilizing vouchers, while Hispanic and Asian/PI households account for well below 5% of HCV households. Families with children represent about 71% of HCV users. Older adults represent about 5% of the HCV users, and persons with disabilities account for about 11%. All vouchers originate from other jurisdictions since no Frisco-related agencies issue vouchers. No project-based Section 8 or HUD multifamily housing exists in Frisco.

b. Segregation and R/ECAPs

i.

Describe the location of publicly supported housing in relation to areas of segregation and R/ECAPs in the jurisdiction (and region, if applicable).

Frisco's public housing and tax credit properties appear near downtown Frisco, which has a high concentration of Hispanics. A majority of households in the area make no more than 30% of Area Median Income. The census tract on the southern border west of the Dallas North Tollway has a high number of households with similar AML, but no HCV holders live in that area.

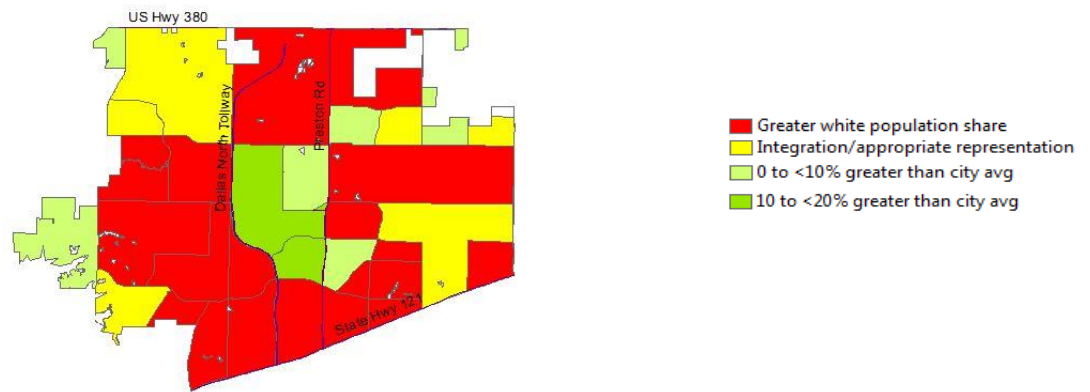


Figure 56: Non-white/white segregation in Frisco

The green L-shaped census tract in Figure 55 has a greater concentration of non-whites than any other part of Frisco, and it contains Frisco's only public housing as well as HCV holders from surrounding jurisdictions (Figure 56). Publicly supported households appear somewhat segregated to central Frisco, but this is also a desirable area because of opportunities in the immediate vicinity.

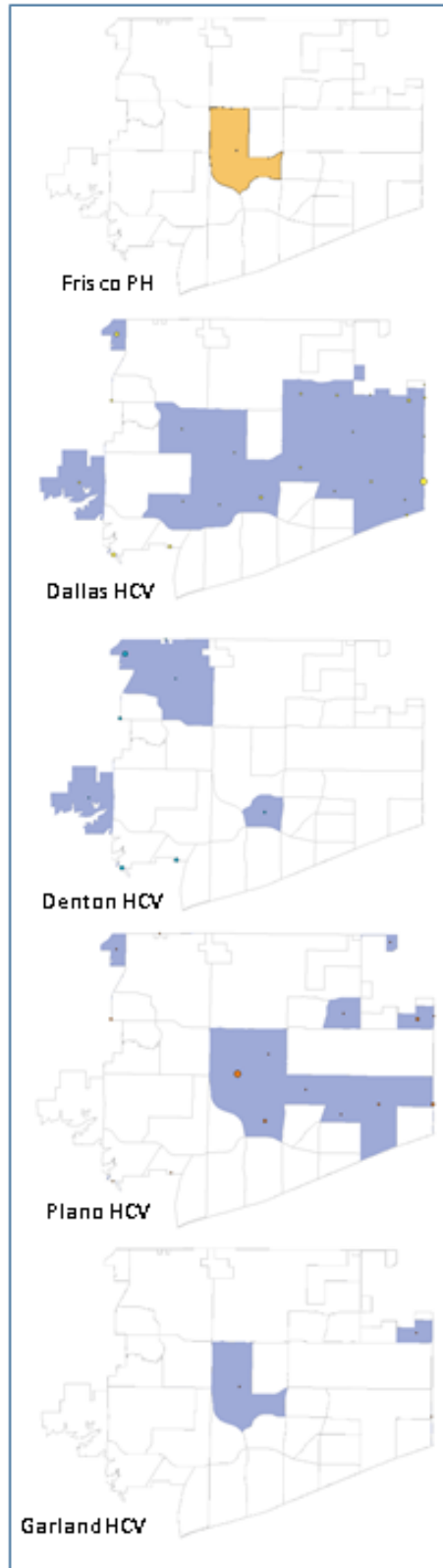


Figure 57: Location of publicly supported housing and HCVs of surrounding jurisdictions (data from participating jurisdictions)

ii.

If there are R/ECAPs, describe any differences in the demographics, including by protected class group, of assisted households who live in R/ECAPs versus those who live outside of R/ECAPs in the jurisdiction (and region, if applicable).

No R/ECAPs exist in Frisco.

iii.

Compare the demographics, by protected class group, of each program category of publicly supported housing to the demographic composition of the areas in which they are located in the jurisdiction (and region, if applicable).

As noted previously, only one census tract in Frisco has publicly supported housing. That tract had 5,961 residents in 2010, which represents an increase of 38% from 4,327 in 2000. The Asian/PI population in this area experienced the most significant growth and increased by 325% (from 52 in 2000 to 221 in 2010). The black population increased 206% (from 200 in 2000 to 575 in 2010), the number of Hispanics increased 79% (from 1,130 to 2,027), and the number of white residents increased 4% (from 3,755 to 3,905). While the diversity of the area appears to be increasing significantly, white residents still constitute a majority (about 66%).

Among households with less than 30% of area median income (235), 40% are white and 45% Hispanic. Among renters in this area, 49% are white, 36% are Hispanic, 5% are black, and 1% are Asian/PI.

Of the 41,811 total households in Frisco, only 0.05% live in public housing (20 units), and 0.28% of the residents use HCVs (118 units).

c. Disparities in Access to Opportunity

i.

Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction (and region, if applicable), including within different program categories of publicly supported housing.

Figure 57 shows the low transportation cost index, transit trip index and school proficiency index for Frisco. The location in central Frisco with public housing has relatively low transportation cost, good access to proficient schools, and a moderate transit index. Overall, access to opportunity appears relatively strong for public housing residents.

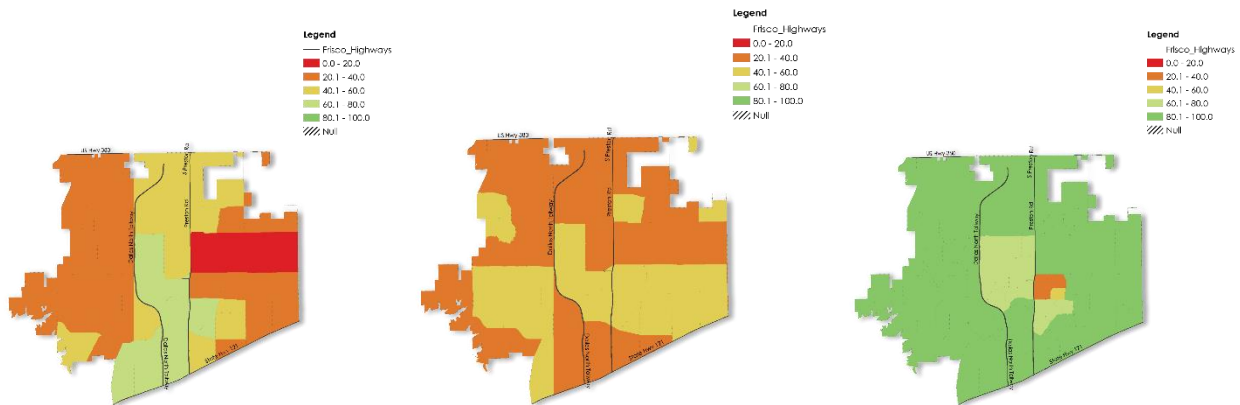


Figure 58: Maps showing the Low Transportation Cost Index, Transit Trips Index and School Proficiency Index for Frisco

d. Disproportionate Housing Needs

i.

Compare the demographics of assisted households of publicly supported housing in the jurisdiction with the disproportionate housing needs, based on protected class identified for the jurisdiction (and region, if applicable).

ii.

Compare the needs of families with children in the jurisdiction (and region, if applicable) for housing units with two, and three or more bedrooms, with the available stock of assisted units.

Family Type					
Families with children		20,099	64.55%	822,439	51.21%

Figure 59: Comparing Frisco's general demographic data with that of its publicly supported housing, US Decennial Census

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	(Frisco, TX CDBG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2	10.00%	8	40.00%	10	50.00%	11	55.00%
Project-Based Section 8	0	0.00%	0	0.00%	0	0.00%	N/a	N/a
Other Multifamily	0	0.00%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	14	12.73%	28	25.45%	65	59.09%	78	70.91%

Figure 60: Frisco's publicly supported housing by bedrooms and households with children, CHAS data

Figures 58 and 59 compare the number for families with children throughout Frisco and in public housing. In public housing, families with children represent 55% of supported households, which remains lower than the overall population in Frisco. Of those households using HCVs from elsewhere in Frisco, 71% have children; a total of 65 of these 78 households live in 3-bedroom units.

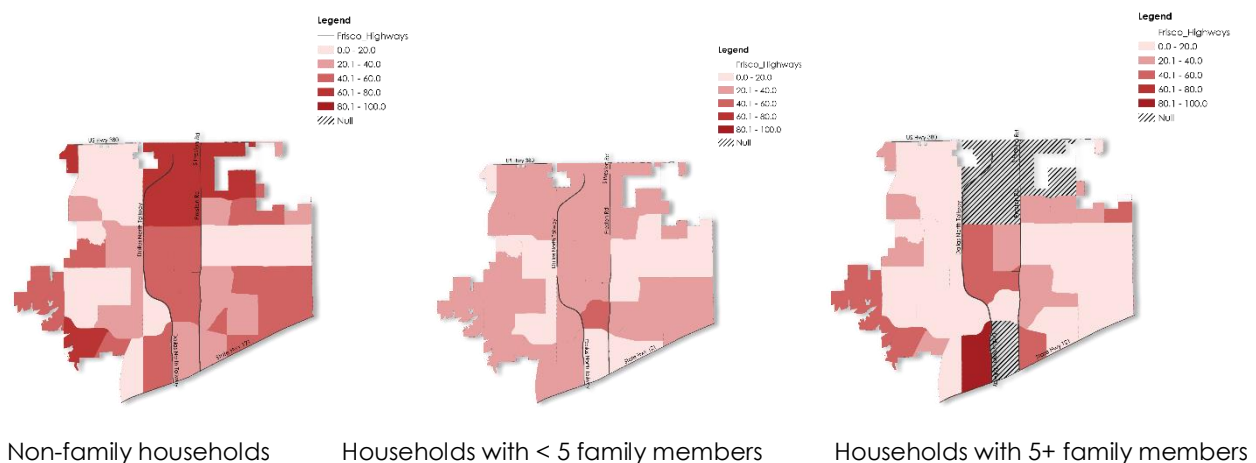


Figure 61: Housing problems by household size for Frisco, CHAS data

Even with relatively little data available, the given maps (Figures 60 and 61) show that based on the housing composition, non-family households experience both housing problems and severe cost burden more frequently. In both figures, non-family households in north central Frisco suffer more frequently. For both non-family households and households with more than five family members on the southwest side of the Dallas North Tollway, a concentration of housing problems and severe cost burdens occurs.

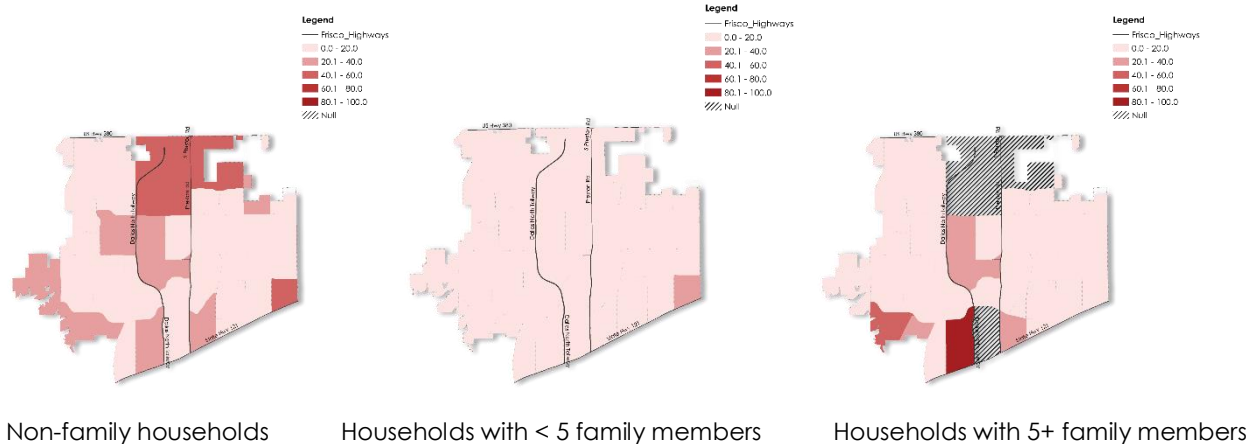


Figure 62: Severe cost burden by household size for the City of Frisco, CHAS data

e. Contributing Factors of Publicly Supported Housing

Lack of access to opportunity due to high housing costs and loss of affordable housing received frequent attention during public meetings. Members of the public appear concerned about the increasing affordability issues for housing in Frisco. They want to see the City planning in the right way with a consideration of the opportunities available nearby. Specifically, affordable housing needs to be located closer to the best job opportunities. One participant said finding housing using a HCV can take six months.

Other comments:

- They prejudice who you are
- Collin County doesn't have any emergency services
- Where is the incentive for the better apartments to accept these lower income people?
Individual landlords won't do this

Displacement of residents due to economic pressures

Some participants in public meetings asked for emergency shelters and transitional housing to address homelessness before it becomes chronic. The solution should not be sending those without housing to Dallas County.

Source of income discrimination, community opposition and impediments to mobility

One participant said a shelter for homeless kids was closed in January because the neighborhood did not like it. Another participant said seekers of affordable apartments are prejudged.

8. Disability and Access

a.

Describe how persons with disabilities are geographically dispersed or concentrated in the jurisdiction (and region, if applicable), including whether persons with disabilities reside in R/ECAPs and other segregated areas identified previously, and describe whether these geographic patterns vary for persons with each type of disability or persons with disabilities in different age ranges.

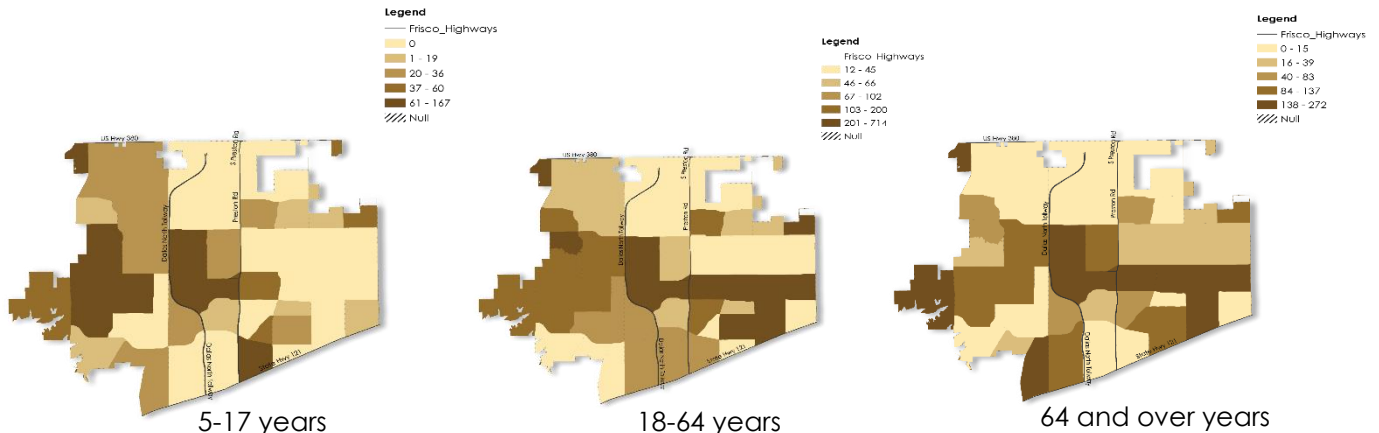


Figure 63: Disability by age group for Frisco, US Decennial Census

Recent U.S. Census data (Figure 62) indicates that 6,652 people in Frisco identify as someone with a disability. Half of these are in the 18-64 age group, 33% in the over age 64 age group, and 16% in the child age group from 5 to 17. As shown in the maps above, individuals with disabilities age 18+ concentrate in the central and southeastern parts of the City. Secondary concentrations appear in west Frisco for all age groups.

Among the six categories of disabilities as provided by HUD, data shows (Figure 63) that ambulatory difficulties dominate. Twenty-four percent of the persons with disabilities in the City have a mobility impairment. The other classifications include 21% with cognitive difficulties, 18% who have independent living difficulties, 16% with hearing difficulties, 12% with self-care difficulties, and 9% with vision difficulties.

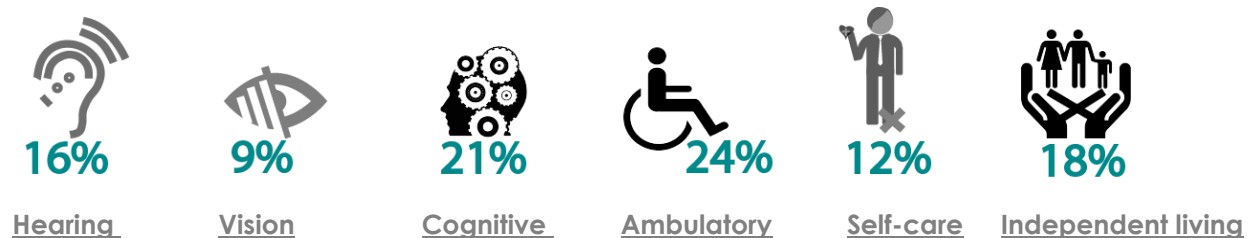


Figure 64 Disability by type for Frisco, US Decennial Census

b.

Describe whether the jurisdiction (and region, if applicable) has sufficient affordable, accessible housing in a range of unit sizes, describe the areas where affordable accessible housing units are located, and identify to what extent persons with different disabilities are able to access and live in the different categories of publicly supported housing.

Supplemental Security Income (SSI) is a federal income support program that provides monthly payments to persons who are disabled, blind or age 65 or over and have little or no income and assets of less than \$2,000 (Social Security Administration, 2017). Monthly payments were \$721 in 2014, or 18% of area median income in the Dallas Metropolitan Statistical Area (MSA). Income earned through wages decreases the monthly benefit by \$.50 for each \$1 earned (Social Security, 2018). Monthly SSI payments in the Dallas MSA in 2014 equaled 101% of the cost of an average one-bedroom apartment and 84% of the cost of an efficiency apartment (Cooper, Knott, Schaak, Sloane & Zovistoski, 2015). Thirty-nine percent of renter households, including non-elderly people with disabilities, had incomes of 50% or less of the area median income, received no government housing assistance, and paid more than 50% of their income for rent and/or lived in inadequate housing (Watson, Steffen, Martin & Vandenbroucke, 2017). Most of the complaints received by Disability Rights Texas, a federally supported advocacy organization for persons with disabilities, concerned the inability to find affordable housing (Cohen-Miller, 2017).

Researchers found that 45% of all housing units in western US metropolitan areas in 2011 had some level of accessibility for persons with disabilities but only 0.16% of housing units achieved full wheelchair accessibility. Homes built before 1950 had the lowest levels of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel & Liao, 2015), but 97% of housing units in both Collin and Denton counties were built after 1950, which increases the likelihood of accessibility (United States Census Bureau, 2016). Most (63%) of Collin and Denton counties' housing stock was built after 1990, which makes it subject to federal requirements that multifamily properties with four or more dwelling units must be adaptable to the needs of persons with mobility impairments (Proctor, 2018; U.S. Department of Housing and Urban Development, U.S. Department of Justice, 2013). Fifty-nine percent of housing units occupied by persons with disabilities in the western US had some level of accessibility (Bo'sher, Chan, Gould Ellen, Karfunkel & Liao, 2015), but only 0.53% of housing units occupied by persons with disabilities were fully wheelchair accessible. Accessible housing appears insufficient in the region to meet the needs of persons with physical disabilities, and lower income housing is usually located in neighborhoods with less security (Garnett, 2017).

Approximately 7% of Collin County residents and 8% of Denton County residents reported some type of disability in the 2016 American Community Survey (United States Census, 2016). Approximately 3,753 persons with ambulatory disabilities lived in Frisco in 2016 (United States Census Bureau, 2016).

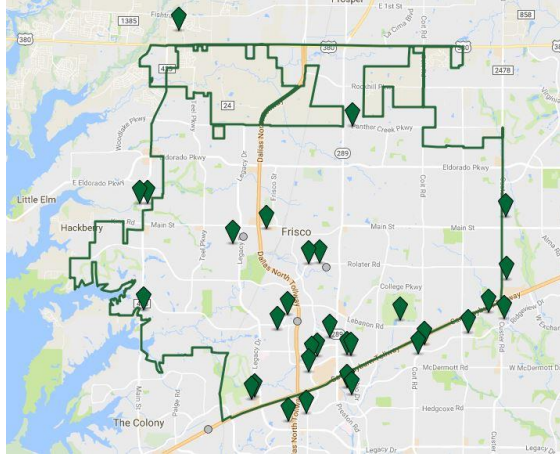


Figure 65: Apartments advertised for Rent with Wheelchair Access for Frisco, Capstone 2018

Figure 65 displays the results of a query for the location of apartments for rent with wheelchair access in Denton County. Eight hundred sixty-seven accessible units were displayed in properties, which is less than the number of persons with ambulatory disabilities living in Frisco. Most of the apartments appear in south Frisco, and a few properties exist in central Frisco (Capstone, 2018). Accessible apartments tend to be clustered in areas with higher rates of non-white residents. These properties' rents range from \$860 to \$7,554 per month, which indicates many units may be unaffordable for persons with limited income sources.

Public meetings acknowledged the lack of accessibility in affordable housing. The private LIHTC properties in Frisco are not fully accessible. As listed in the Texas Department of Housing and Community Affairs (Figure 66), these properties have limited vacancies and most of the units are non-accessible (Texas Department of Housing and Community Affairs, 2018).

Property	Non-Accessible Units				Accessible Units					
	1 Bedroom	2 Bedroom	3 Bedroom	Vacancies	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 or more Bedroom	Vacancies
<u>Inclusive Communities Housing Development Corporation</u>	0	0	2	0	0	0	0	0	0	0
<u>North Court Villas</u>	26	71	35	2	0	1	1	0	0	1
<u>Preston Trace Apartments</u>	22	54	0	0	2	2	0	0	0	0
<u>Stonebrook Village Apartments</u>	24	128	64	0	0	0	0	0	0	0

Figure 66: Vacancies in LIHTC properties in Frisco as of June 2018, TDHCA

C.

Describe to what extent persons with disabilities in the jurisdiction (and region, if applicable) reside in segregated or integrated settings.

The lack of affordable, accessible housing can force persons with disabilities into nursing homes when they might be able to live independently with supportive services in the community (Gooden, 2017). Almost all participants in focus groups expressed the desire to live in an integrated setting in the community with a mix of persons with and without disabilities. Parents and guardians of persons with intellectual and developmental disabilities (IDDs) who participated in NTRHA focus groups were currently supporting their adult children in their own homes and expressed concerns about whether their children would be able to continue to live independently when the guardians were no longer available to provide this support. Some of these guardians expressed concern that their adult children would never be able to continue to afford to live in the communities in which they grew up and had developed social connections with clubs, Special Olympics teams, jobs and friends. Medicare/Medicaid-certified nursing homes provided services to 1,423 Collin County residents and 1,398 Denton County residents in December 2017 for a bed occupancy rate of only 83% and 70%, respectively (Texas Health and Human Services Commission, 2017). A total of 44 nursing facilities accept both Medicaid and Medicare in Denton County (2,247 beds) and Collin County (2,832 beds) (Figure 67); these include three facilities in Frisco with a total of 434 beds (Texas Health and Human Services Commission, 2018).

Provider in Denton County	City	ZIP Code	No. of Beds
Brookhaven Nursing and Rehabilitation Center	Carrollton	75010	180
Corinth Rehabilitation Suites on The Parkway	Corinth	76208	134
Cottonwood Nursing and Rehabilitation LP	Denton	76201	60
Countryside Nursing and Rehabilitation LP	Pilot Point	76258	108
Cross Timbers Rehabilitation and Healthcare Center	Flower Mound	75028	120
Denton Rehabilitation and Nursing Center	Denton	76201	196
Good Samaritan Society -- Lake Forest Village	Denton	76210	60
Good Samaritan Society-Denton Village	Denton	76201	88
Hollymead	Flower Mound	75028	112
Lake Village Nursing and Rehabilitation Center	Lewisville	75057	120
Longmeadow Healthcare Center	Justin	76247	120
Pilot Point Care Center	Pilot Point	76258	63
Prairie Estates	Frisco	75034	180
Prestonwood Rehabilitation & Nursing Center Inc	Plano	75093	132
Rambling Oaks Courtyard Extensive Care Community	Highland Village	75077	70
Remarkable Healthcare of Prestonwood	Carrollton	75010	120
Senior Care at Denton Post-Acute Care	Denton	76208	146

Provider in Denton County	City	ZIP Code	No. of Beds
Vintage Health Care Center	Denton	76201	106
Vista Ridge Nursing & Rehabilitation Center	Lewisville	75067	132
Total			2,247

Provider in Collin County	City	ZIP Code	
Accel at Willow Bend	Plano	75093	110
Baybrooke Village Care and Rehab Center	McKinney	75070	128
Belterra Health & Rehab	McKinney	75071	103
Carrara	Plano	75093	112
Collinwood Care Center	Plano	75074	120
Continuing Care at Highland Springs	Dallas	75252	44
Farmersville Health and Rehabilitation	Farmersville	75442	74
Founders Plaza Nursing & Rehab	Wylie	75098	106
Garnet Hill Rehabilitation and Skilled Care	Wylie	75098	128
Landmark of Plano Rehabilitation And Nursing Center, LLC	Plano	75075	160
Lexington Medical Lodge	Farmersville	75442	128
Life Care Center of Plano	Plano	75075	120
McKinney Healthcare and Rehabilitation Center	McKinney	75069	125
North Park Health and Rehabilitation Center	McKinney	75069	140

Provider in Collin County	City	ZIP Code	
Park Manor Of McKinney	Mckinney	75069	138
San Remo	Richardson	75082	112
Settlers Ridge Care Center	Celina	75009	128
Stonemere Rehabilitation Center	Frisco	75035	136
The Belmont At Twin Creeks	Allen	75013	112
The Healthcare Resort of Plano	Plano	75075	70
The Hillcrest of North Dallas	Dallas	75252	120
The Legacy at Willow Bend	Plano	75024	60
The Park in Plano	Plano	75075	120
Victoria Gardens of Allen	Allen	75002	120
Victoria Gardens of Frisco	Frisco	75035	118
Total			2832

Figure 67: Certified nursing long-term care facilities in Denton County and Collin County, NCTCOG 2018

Participants in focus groups preferred community-based housing but also wanted to live near others experiencing a disability for mutual support. One focus group participant designed a small community of “villas” where persons with disabilities could live in their homes with their own families while sharing personal care assistants and other resources. Some families with higher incomes use “ranches” that provide supported independent living for persons with IDD, an example of the movement toward protected, community living for persons with disabilities (Down Home Ranch, 2018; Marbridge Foundation, 2018). Costs to live in these communities are \$3,600 per month, and private pay only. Families in public participation stated that even these programs may not be right for everyone and required individuals to live two to three hours away from family.

d.

Describe the processes that exist in the jurisdiction (and region, if applicable) for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address any barriers faced in accessing government facilities, public infrastructure, transportation, proficient schools and educational programs, and jobs.

Transportation

The Texoma Area Paratransit System (TAPS) provides low-cost transportation for the elderly, low-income persons and disabled persons as well as the general population (City of Frisco, 2013).

Housing Rehabilitation

As a part of the process for rehabilitation application, program staff for the housing rehabilitation program interview disabled citizens in their home. Individuals with disabilities may receive home repairs and enhancements through the housing rehabilitation program.

The Consolidated Plan (City of Frisco, 2015) includes a goal of homeless prevention, which includes an objective to provide transitional housing and homelessness prevention programs for those in the "Non-Homeless Special Needs" category. This includes the elderly, individuals with disabilities and abused children. The City received no applications; therefore, none of these residents received services.

e.

Contributing Factors of Disability and Access

It came up in public participation that no specific barriers to access for persons with disabilities exist in Frisco. More broadly, residents in the region provided valuable information, as detailed in the preceding pages.

Lack of access to transportation for persons with disabilities ranked as the most frequently mentioned contributing factor of disability and access in Frisco. The public also provided comments regarding the lack of wheelchair access on buses. Furthermore, residents believe Frisco has too few transportation options for the elderly population or persons with disabilities.

9. Fair Housing Enforcement

a.

Describe whether the program participant is currently the subject of any of the following:

- **A charge or letter of finding from HUD concerning a violation of a civil rights-related law;**

No unresolved charges or letters of findings from HUD exist.

- **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;**

No unresolved cause determinations from a substantially equivalent state or local fair housing agency exist.

No unresolved voluntary compliance agreements, conciliation agreements or settlement agreements exist.

- **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; or**

No unresolved letters of findings from the Department of Justice exist.

- **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.**

No unresolved claims under the False Claims Act exist.

b.***Contributing Factors of Fair Housing Enforcement***

Resources for fair housing enforcement agencies and organizations and local education and fair housing enforcement by private housing providers represent contributing factors for fair housing enforcement mentioned in public meetings in Frisco.

The public identify a lack of information, outreach and awareness regarding where to obtain help. These represent the major barriers to proactive efforts in finding units as part of the effort to avoid losing vouchers. Similarly, one of the participants in a public meeting said that even though organizations receive funds, they are not allowed to do anything with them. Only certain portions are used for rent and housing assistance, but even with leftover funds, limitations in place make action impossible. This seems to be partially the result of inaction on the part of private providers.

10. Additional PHA Information

According to the City of Frisco's Community Development Supervisor, Sarah Carroll, Frisco faces a challenge with federal funding.

Year	Entitlement	% Change
2005	\$ 230,040.00	100%
2006	\$ 227,165.00	-1.25%
2007	\$ 244,244.00	7.52%
2008	\$ 255,525.00	4.62%
2009	\$ 274,634.00	7.48%
2010	\$ 314,244.00	14.42%
2011	\$ 273,076.00	-13.10%
2012	\$ 333,432.00	22.10%
2013	\$ 390,928.00	17.24%
2014	\$ 380,402.00	-2.69%
2015	\$ 401,568.00	5.56%
2016	\$ 435,452.00	8.44%
2017	\$ 468,248.00	7.53%

Figure 68: Historical CDBG Award Data, City of Frisco 2018


explains, "In 2016, the City received \$435,452. The City of Frisco was not able to spend the funds in a timely manner. This is a violation of the 1.5 rule set by HUD, which states that you cannot have more than 1.5 times your allocation at a point-in-time prior to the end of your grant cycle. The City had 1.74, and with two-thirds of the staff leaving in early 2017, the program has struggled to get back on top. We are looking for opportunities to make large impacts with the funding. At the same time, we are beholden to our current Five-Year Consolidated Plan unless we do a substantial amendment. The largest project we have been able to accommodate under the current plan has been the infrastructure improvements to the Frisco Housing Authority. We have provided new sewer and water lines for them, and we are currently seeking an increase in funding through the substantial amendment process to our current action plan for the next phase of the project — running new water lines inside the units and renovating the bathrooms to most of the units. We feel that we will meet the 1.5 test this year, but we received news that funding will increase again next year. If we are on track for another roughly 7% increase, we will break \$500,000, and we will need to make large impacts. At this point we are discussing large projects and new projects that the City has not previously done. Short of some large infrastructure projects, our program is going to face some challenges" (City of Frisco, 2018).

VI. Fair Housing Goals and Priorities

1

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.

Comments received from public meetings, focus groups and stakeholder or subject matter expert interviews and consultations were coded and summarized using qualitative analysis software and grouped by fair housing issue area and contributing factors. The chart on the following page summarizes all public input by related groups of contributing factors for each issue area. Figure 69 lists groups of contributing factors in terms of their relative frequency within each issue area, with the most frequently identified contributing factors at the top of each column. Similar colors identify related contributing factors that cross and repeat among issue areas.

Rank	 Contributing Factors of Disparities in Access to Opportunity 59, 56%	Contributing Factors of Disproportionate Housing Needs 6, 9%	Contributing Factors of Publicly Supported Housing Location and Occupancy 16, 23%	Contributing Factors of R/ECAPs 3, 4%	Contributing Factors of Segregation 0, 0%	UNIVERSITY OF TEXAS  ARLINGTON Disability and Access Issues Contributing Factors 4, 6%	Fair Housing Enforcement 2, 3%
1	Location and type of affordable housing, lack of access to opportunity due to high housing costs, loss of affordable housing 10, 14%	Availability of affordable units in range of sizes, loss of affordable housing, lack of access to opportunity due to high housing costs, displacement of residents due to economic pressures 3, 4%	Lack of access to opportunity due to high housing costs, loss of affordable housing 6, 9%	Displacement of residents due to economic pressures 1, 1%		Access to transportation for persons with disabilities 2, 3%	Local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.) 1, 1%
2	Availability, type, frequency and reliability of public transportation 9, 13%	Lack of investments in specific neighborhoods, both public and private 1, 1%	Displacement of residents due to economic pressures 3, 4%	Lack of investments in specific neighborhoods, both public and private, and lack of community revitalization strategies 1, 1%		Lack of affordable, accessible housing in range of unit sizes 1, 1%	Resources (staff, budget, etc.) for fair housing enforcement agencies and organizations 1, 1%
3	Lack of investments in specific neighborhoods, both public and private 8, 11%	Source of income, background, lending discrimination 1, 1%	Source of income discrimination, community opposition, impediments to mobility 3, 4%	Land use and zoning laws 1, 1%		Lack of assistance for housing accessibility modifications 1, 1%	
	Access to financial services, lending discrimination, source of income discrimination, private discrimination 3, 4%	Other 1, 1%					



Legend:  Policy and laws  Investments in Neighborhoods  Discrimination  Transportation  Affordable Housing

Figure 69: Contributing factors in Frisco

Source: public meetings, focus groups, interviews, consultations and survey responses from 2017 Assessment of Fair Housing

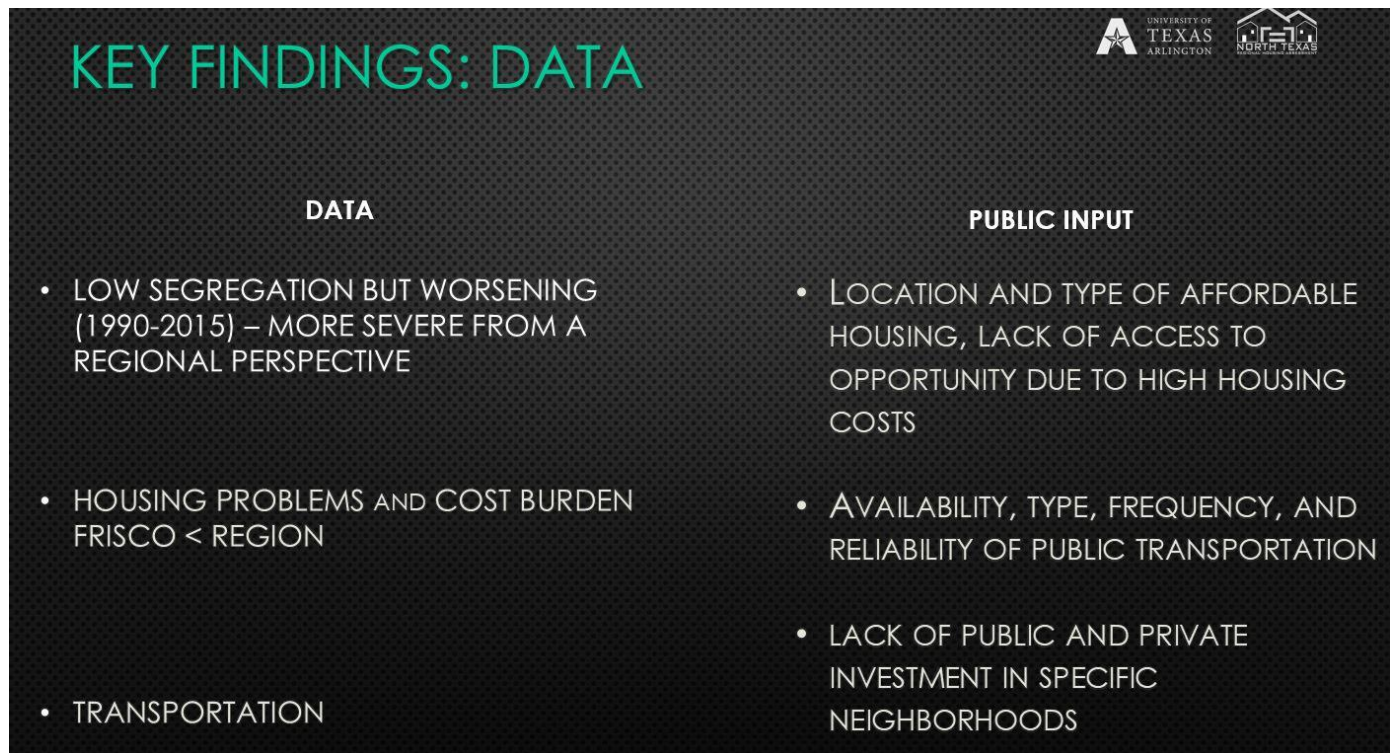


Figure 70: Key findings slide for Frisco

The second public meeting presented key findings from the data and public input to obtain more feedback. The available data indicates several other issues. Only three issues detected were presented. Segregation appears to be worsening regionally and remains much more severe regionally than in Frisco. The cost burden in Frisco appears higher than in the region. Transportation represents an important concern.

The study developed goals to address each top priority issue.

Participants in round two meetings rated each goal in terms of its importance to addressing fair housing issues. Figure 71 displays the number of votes from the public meeting for each goal. The goal regarding increasing access to information and resources on fair housing and affordable housing received only one “low” vote. Other than that, none of the other goals received a rating of low or not important from any voter.

The figure lists the goals based on the total number of votes of high importance. Among these goals, meeting the community needs of affordable housing for all range of income groups and increasing access to information and resources on fair and affordable housing were ranked as the two most important. Making investments to increase access to affordable transportation options for low-income households and persons with disabilities fall into the next tier. Finally, increasing the supply of accessible, affordable housing for persons with disabilities was ranked last.

Meeting Date: 2/6/2018		
Goals	Importance	Votes #
Meet the community needs of affordable housing for all range of income groups	High	23
	Medium	0
Increase supply of accessible, affordable housing for persons with disabilities	High	16
	Medium	5
Make investments to increase access to affordable transportation options for low-income households and persons with disabilities	High	22
	Medium	0
Increase supports and services for residents of publicly supported housing	High	18
	Medium	6
Increase access to information and resources on fair and affordable housing	High	23
	Medium	1
	Low	1

Figure 71 : Voting results from public meetings on importance of AFH goal

The study also distributed draft goals and strategies to the NTRHA Technical Advisory Committee. The advisors made the following comments in a meeting held in June 2018:

- Goals and strategies must be accompanied by more detailed metrics, milestones and identification of the parties to be involved in implementation.
- Goal implementation should incorporate community partners.
- AFH goals should strive to set policy that makes affordable housing development on vacant land cheaper and easier to do.
- Need a strategy to deal with cities in the region that lack the political will to increase affordable housing.
- Smaller housing authorities should consider collaboration or consolidation to address problems with lack of capacity. Use regional approaches to address lack of capacity.
- Make goals around access to fair housing information consistent across all jurisdictions in the NTRHA. This should include tenant rights education (e.g. rights to repairs). Research and use best practices for information dissemination, including working through nonprofit partners (e.g. tenant rights organizations), making information mobile and taking it to the apartments where the problems are greatest.
- Develop goals and strategies that promote equitable development.
- Mount an outreach program to voucher holders, through nonprofit partners, to make them aware that they can use the SAFMR program to move to better areas. Watch for new mobility funding possible from Congress.
- Include in the AFH report a discussion of the capacity required by cities and housing authorities to continuously track progress toward metrics. Be detailed about what is needed.

2

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 goals 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 Achievement	Responsible Program Participants
Meet the community needs of affordable housing for all range of income groups	Location and type of affordable housing	R/ECAPS	Require developers who seek funding from the City for affordable senior housing to either have services embedded in the housing or have a plan for connecting people to services.	Frisco Housing Authority
	Lack of access to opportunity due to high housing costs	Access to opportunity	Amend local zoning codes to incentivize the construction of accessible units in higher density, mixed-use locations and to allow for a broader range of affordable housing options for protected classes.	City of Frisco
	Impediments to mobility	Disproportionate housing needs	Prioritize resources to develop transitional housing or permanent supported housing for persons experiencing homelessness and for homeless prevention efforts.	Regional Consortium
	Land use and zoning laws	Publicly supported housing	Reform policy to allow and support owners of existing urban properties to increase density to reduce infill development costs (add story, replace single-family with multifamily, etc.).	
	Lack of investments in specific neighborhoods		Sponsor and subsidize development of social housing to meet specific needs, such as seniors, single moms, people with disabilities, and low incomes.	
	Displacement of residents due to economic pressures			
	Private discrimination			
Increase supply of accessible, affordable housing for persons with disabilities	Location of employers			
	Access to financial services			
	Availability of affordable units in range of sizes	R/ECAPS	Require the development application process, as defined by law, to include fair housing accessibility guidelines prior to a final building permit being issued.	Frisco Housing Authority
	Location and type of affordable housing	Access to opportunity	Host information forums on housing and accessibility modifications for locally partnered organizations that provide services to people with disabilities.	City of Frisco
	Lack of access to opportunity due to high housing costs	Disproportionate housing needs	Survey ADA compliance accommodations on sidewalks, crosswalks, business entrances, etc., and allocate appropriate funds to bring public areas up to code.	
	Loss of affordable housing	Publicly supported housing	Continue seeking incentives to encourage developers to construct affordable housing for persons of disabilities.	

Make investments to increase access to affordable transportation options for low-income households and persons with disabilities	Lack of affordable, accessible housing in range of unit sizes		Include evaluation of access to community resources for low-income and protected persons into comprehensive planning processes and revitalization plans.	Frisco Housing Authority
	Access to transportation for persons with disabilities	Disabilities and access	Collaborate with transportation agencies to create innovative programs providing affordable transportation options in lower opportunity areas. Form partnerships to provide affordable transportation options to connect regional residents to employment and schools in Frisco.	City of Frisco
Increase support and services for residents with housing assistance	Admissions and occupancy policies and procedures, including preferences in publicly supported housing	R/ECAPS	Annually gather feedback from residents on the quality of the management of housing units and/or landlord-related issues.	Frisco Housing Authority
	Impediments to mobility	Access to opportunity	Partner with supportive agencies and nonprofits to provide on-site support to residents (counseling, child care, transportation, etc.).	
	Displacement of residents due to economic pressures	Disproportionate housing needs	Promote services, including career exploration, mentoring, peer programs and experiential learning, to enable middle and high school students in publicly supported housing to better prepare for careers.	
	Lack of affordable, accessible housing in range of unit sizes Lack of assistance for housing accessibility modifications Other: Child care	Publicly supported housing Disabilities and access	Expand fair housing outreach, education and training for rental property owners, managers, residents and individuals on wait lists.	
Increase access to information and resources on fair and affordable housing	Local education and fair housing enforcement by private housing providers (real estate agents, builders, etc.).	Fair housing enforcement	Establish community meetings with financial institutions, insurance companies, landlords, real estate agents, advocacy groups and community-based organizations to enhance their knowledge and support for fair housing goals.	Frisco Housing Authority
	Resources (staff, budget, etc.) for fair housing enforcement agencies and organizations	Publicly supported housing	Continue to expand fair housing outreach, education and training for youth and other targeted populations through school programs and other collaborative strategies.	City of Frisco
	Quality of affordable housing information programs		Implement transparent tracking and reporting of fair housing complaints and increase fair housing enforcement. Coordinate with nonprofits and adjacent jurisdictions for regional effort on affordable housing.	

Figure 72: Goals and strategies for Frisco

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APPENDIX

A. Methodology for Segregation Analysis

To assess levels and patterns of segregation, HUD has provided program participants with a 'Dissimilarity Index' which measures the relative degree of segregation between two groups. The higher the value, the higher the degree of dissimilarity. To supplement the HUD dissimilarity index and assess spatial patterns of segregation, our team of researchers has developed the following methodological protocol.

Using the dissimilarity value as a starting point, the intent is to measure to what extent the racial composition of a given census tract significantly differs from the overall jurisdictional racial composition. In other words, the objective is to assess whether there is a statistically significant difference between the racial makeup of a census tract (conventional equivalent of a neighborhood) and the overall city. To do so, we performed a series of "t-test" for non-white groups/white, black/white, Hispanic/white and Asian or Pacific Islander/white – in accordance with the available HUD dissimilarity indices. The values obtained from this type analysis allow determining whether a statistical difference exist.

Below is a brief overview of the analytical steps taken to assess spatial patterns of segregation.

A. T-TEST

In order to compare the jurisdictional racial/ethnic composition with that in each census tract, we decided to use t-test.

\hat{p} = percentage of selected racial/ethnic group in census tract (i.e. 'non-white')

Test statistic:

$$Z = \frac{\hat{p} - p_0}{\sqrt{\frac{p_0(1-p_0)}{n}}}$$

p_0 = percentage of selected racial/ ethnic group in jurisdiction (i.e. 'non-white')

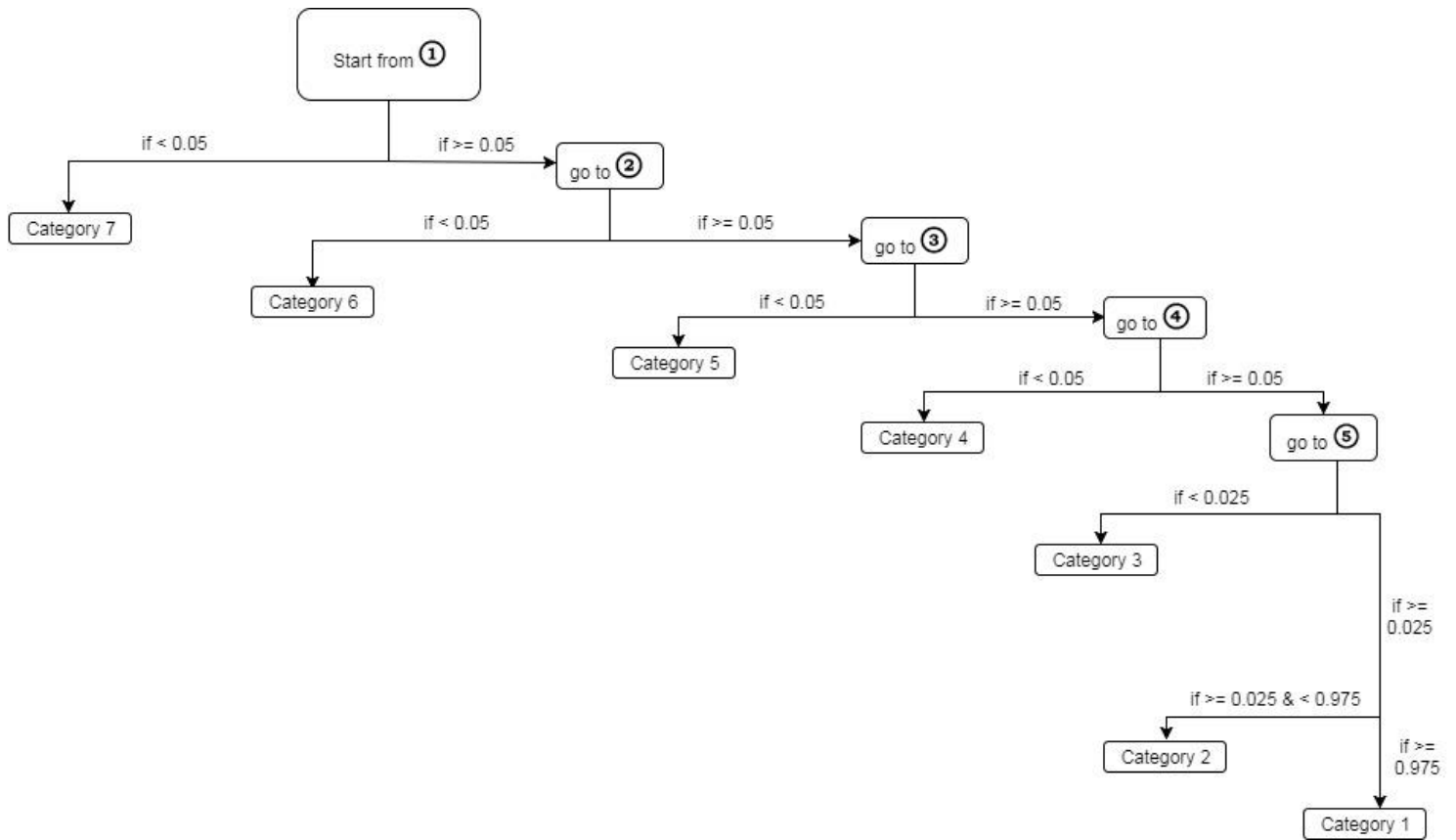
n = total population in one census tract

For each census tract, we obtain a Z value for which there is a corresponding 'p-value' that allows us to determine whether we accept or reject the hypothesis that the racial composition of the census tract is statistically different from the city. Put simply, if the p-value is smaller than 0.05 (one tail) or 0.025 (two-tail test), then there is a statistical difference between the census tract and the city (at a 95% of confidence).

B. METHODOLOGICAL APPROACH

In order to assess the magnitude of the difference between the census tract and the city, we sequentially performed multiple t-tests for several percentage difference brackets; namely: 10,20,30,40 and more than 40% difference. Similarly, for each z-value and associated p-value, we determined whether there is a significant difference for the set range (either >40% difference, <40%, <30%, <20% and <10%). Within a 1% difference range, the census tract is qualified as "integrated" with respect to overall jurisdictional composition.

The flow chart below shows how we decide which category a census tract belongs to:



Category	Meaning
1	Greater white population share
2	Integration
3	Up to 10% greater than jurisdiction pct
4	Up to 20% greater than jurisdiction pct
5	Up to 30% greater than jurisdiction pct
6	Up to 40% greater than jurisdiction pct
7	More than 40% greater than jurisdiction pct