

<b>TABLE OF CONTENTS</b>		
<b>PART I</b>		
i	<b>Acknowledgements &amp; Introduction</b>	<b>3</b>
ii	<b>Community Participation Process</b>	<b>8</b>
iii	<b>Assessment of Past Goals and Actions</b>	<b>13</b>
<b>PART II</b>		
iv	<b>Fair Housing Analysis</b>	
A	<b>Demographic Summary</b>	<b>26</b>
B	<b>General Issues</b>	
i	<b>Segregation/Integration</b>	<b>33</b>
ii	<b>Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)</b>	<b>38</b>
iii	<b>Disparities in Access to Opportunity</b>	
a)	<b>a) Educational Opportunities</b>	<b>43</b>
b)	<b>Employment Opportunities</b>	<b>46</b>
c)	<b>Transportation Opportunities</b>	<b>49</b>
d)	<b>Low Poverty Exposure Opportunities</b>	<b>52</b>
e)	<b>Environmentally Healthy Neighborhood Opportunities</b>	<b>54</b>
f)	<b>Patterns in Disparities in Access to Opportunities</b>	<b>58</b>
g)	<b>Additional Information</b>	<b>60</b>
iv	<b>Disproportionate Housing Needs</b>	<b>62</b>
C	<b>Publicly Supported Housing Analysis</b>	<b>68</b>
D	<b>Disability and Access Analysis</b>	<b>101</b>
E	<b>Fair Housing Enforcement, Outreach Capacity, and Resources Analysis</b>	<b>114</b>
<b>PART III</b>		
V	<b>Fair Housing Goals and Priorities</b>	<b>125</b>
<b>APPENDICES</b>		
	<b>HUD Provided Maps and Tables</b>	
	<b>Potential Contributing Factors</b>	
	<b>Supporting Documents:</b> Greater Boston Legal Services Background Information, U.S. Census: Gen Pop + Place of Birth	

## Demographic Summary

V.A.1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

*Instructions: For question (1), refer to Tables 1 and 2, which present demographic summary data for the jurisdiction and region. The demographics analyzed must include an overview of: racial/ethnic populations; national origin populations, including any limited English proficient populations; individuals with disabilities by disability type; and families with children.*

**Race/Ethnicity:** The Fair Housing Act prohibits discrimination based on race, color, or national origin. Based on the HUD-provided summary of 2010 Census data in Table 1, Boston was 47.01% white, non-Hispanic, 22.36% Black, non-Hispanic, 17.47% Hispanic, 8.91% Asian or Pacific Islander, .2% Native American, and 1.63% other non-Hispanic. HUD's summary did not provide data for the 14,959 (2.4%) of the population in the "Two or More races, non-Hispanic" category. However, understanding the racial and ethnic composition of Boston's population is much more complicated than it would appear from HUD's summary. As shown in the Census Bureau's **Profile of General Population and Housing Characteristics: 2010 (provided in Appendix D)**, 42,721 or nearly 40% of Boston's Hispanic population identify their race as White. Boston's Hispanic/Latino population represents many ethnic groups and is not a monolithic group. Boston's White Hispanic and White, non-Hispanic populations together make up the majority (53.9%) of Boston's population by race. Overall, almost 52,000 people or 8.4% of the population, including nearly 39% of the Hispanic population, chose "some other race" rather than one of the standard racial categories and another 4% identified as multi-racial (two or more races). Racial identity in the Hispanic/Latino population cannot be easily simplified into a few categories as many Hispanic or Latinos identify across the racial spectrum. The use of the term Latino over Hispanic is often preferred, but there is not universal agreement for the use of one term over the other. Blacks are the largest racial/ethnic "minority" group in the City followed by Hispanics. Many Hispanics also identify as Black. This contrasts radically with the broader Boston-Cambridge-Newton metropolitan region which is nearly 75% white, non-Hispanic. The City of Boston is much more ethnically and racially diverse than the broader metro region in which it is located.

**National Origin and Limited English Proficiency (LEP):** The Fair Housing Act also prohibits discrimination based on national origin. HUD has provided data from the American Community Survey on the top 10 countries of origin of the foreign-born population in Boston and the metro area. The Dominican Republic is the #1 country of origin for foreign born residents of both Boston (17,919 or 2.9%) and the metro region (62,800 or 1.38%). Boston also has large numbers of residents born in Haiti (15, 429) and China (14,817). Chinese are the second largest group (61,975) of foreign born in the metro area followed by Brazilians (49,283), Indians (42,875) and Haitians (42,476). Looking beyond the "top 10" countries of origin, we note that Boston has an estimated 2,450 foreign-born residents from the six predominantly Muslim countries whose entry into the United States has been restricted by a Presidential executive order. These are Somalia (1,334), Iran (731), Syria (210), Sudan (172), Yemen (0) and Libya (not estimated separately). We are concerned that residents from these countries may now find themselves

---

subject to discrimination based on national origin or religion. The Office of Fair Housing and Equity, Boston Fair Housing Commission has seen an increase in 2017 in race and national origin discrimination cases. Anecdotal, BFHC and the Mayor's Office for Immigrant Advancement and Boston Community Health Centers have reported Boston undocumented residents leaving their homes because of the threat of ICE by a housing provider. Health Centers and other direct service providers have also reported constituents dropping out of health prevention services for fear of deportation. Many of these constituents never file a complaint with the BFHC for fear of and or mistrust of government. This is consistent with trends reported by other Massachusetts Fair Housing Assistance programs. For more detail see the **Place of Birth for the Foreign-Born Population in the U.S.** document in Appendix D.

Spanish is by far the #1 language spoken by those who speak English "less than very well" in both Boston (46,349 or 7.78%) and the metro area (151,176 or 3.32%). This is not surprising given the large combined number of foreign born residents from the Dominican Republic, El Salvador, Colombia, and Guatemala. Chinese is the #2 LEP language spoken in Boston (13,670) and in the metro area (51,325). In Boston, French Creole, Vietnamese and Portuguese are the third, fourth and fifth most frequently spoken languages with 1.93%, 1.27% and 0.82% of the population, respectively. In the metro area, Portuguese is the #3 LEP language followed by French Creole and Vietnamese. The large number of Portuguese speakers is a reflection of the large number of foreign born coming from Brazil or Cape Verde.

**Disability Status and Type:** Persons with disabilities are a protected class under the Fair Housing Act. HUD has provided data on the numbers of persons with one or more of 6 types of disability: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. The counts in each category are not mutually exclusive because an individual may have multiple disabilities and therefore would be counted in more than one disability category. Ambulatory difficulty is the largest disabilities type in both Boston (38,702 or 6.5%) and the metro area (231,880 or 5.4%) and directly impacts the need for accessible or adapted housing, as do the numbers of persons with hearing and vision difficulties. There is also a great need to raise awareness among the disabled community that they can request a reasonable accommodation in housing. Feedback received from disabled community member confirmed that often a reasonable accommodation is not requested for fear of a rent increase or non-renewal of lease. The second largest disability category is cognitive difficulty followed by independent living difficulty. These two categories along with self-care difficulty are indicators of the numbers of persons potentially needing affordable housing with supportive services.

**Sex:** The Fair Housing Act prohibits discrimination based on sex. According to HUD's data, about 52% of the population of Boston and the metro area are female and 48% are male. HUD did not provide data for gender identity categories. Gender Identity and Expression are protected under Massachusetts Anti-Discrimination law, [M.G.L. 151B](#)

**Families With Children and Age:** The Fair Housing Act prohibits discrimination based on familial status. Discrimination against families with children seeking housing is a commonly identified as a significant problem. According to HUD's data, 44.35% of Boston's families and

---

45.55% of the metro area's families are families with children. This data underestimates the number of families with children because it did not include data on families with a male householder with no wife present.

About 17% (103,710) of Boston's population are children under the age of 18 compared with about 21.6% in the metro area. Discrimination against families with children would negatively impact the children in these households. Boston's working-age population (71.13%) is proportionately larger than that of the metro area (65.31%). A smaller percentage of Boston's population is elderly (about 11%) compared with the metro area (about 14%). Discrimination against families with children is consistently between 35 and 40% of the BFHC caseload. The majority of familial status discrimination cases the BFHC receives are related to the presence of lead paint in the unit. Lead abatement is the responsibility of the landlord/owner. While the number of children suffering from lead toxicity in Massachusetts has decreased, a side-effect of M.G.L. ch. 111, s. 199A has been discrimination.<sup>1</sup> Discrimination against families with young children in the rental market today is a systemic problem. While State law requires property owners to remove lead hazards from homes occupied or to be occupied by children age six and under, landlords are incentivized not to rent to this cohort to avoid lead abatement costs.<sup>2</sup>

---

<sup>1</sup> Cf. MASS. GEN. LAWS ch. 111, § 199A(a) (2012) ("It shall be an unlawful practice for purposes of chapter one hundred and fifty-one B for the owner, lessee, sublessee, real estate broker, assignee, or managing agent of any premises to refuse to sell, rent, lease or otherwise deny to or withhold from any person or to discriminate against any person in the terms, conditions or privileges of the sale, rental or lease of such premises, because such premises do or may contain paint, plaster or accessible structural materials containing dangerous levels of lead, or because the sale, rental or lease would trigger duties under sections one hundred and eighty-nine A to one hundred and ninety-nine B, inclusive . . ."); United States Environmental Protection Agency, Effective Partnerships Working to Virtually Eliminate Childhood Lead Poisoning in Boston, MA, <http://www.epa.gov/region1/eco/uep/ma/success.html>

<sup>2</sup> See Victoria L. Williams, Boston Fair Housing Commission, City of Boston Analysis of Impediments to Fair Housing Choice, 74-75 (2010).

---

---

## Demographic Trends 1990-2010

*Note: HUD has acknowledged that there were errors in the data columns for the Boston-Cambridge-Newton MA-NH Region in the AFFHT-0001 version of Table 2: **Demographic Trends**. The population figures in the rows for Native Americans and Hispanics in the 1990 Trend and 2000 Trend columns were reversed and all of the figures in the 2010 Trend column were truncated. We have manually corrected the data for this second draft AFH. The “Current” column is the same as the “2010 Trend” for this data set.*

*We believe that there is also an error in the 2000 Trend data on Family Type for both the City of Boston and the metro region. The number of families with children is unlikely to have declined by such a large number from 1990 to 2000 and then increased by such a large number from 2000 to 2010. We have brought this to HUD’s attention and have requested that HUD research this issue.*

**Race/Ethnicity:** HUD’s data shows that Boston’s White, Non-Hispanic population declined by 46,585 (11.8%) between 1990 and 2000, probably reflecting the “white flight” from the city to the suburbs and the sunbelt that occurred during that time. At the same time, HUD’s data shows increases in the number of Black, non-Hispanics (14,448 or 10.5%), Hispanics (23,221 or 37.5%), and non-Hispanic Asian/Pacific Islander population increased by (17,234 or 58%). From 2000 to 2010, Boston’s white, non-Hispanic population remained essentially unchanged while Boston’s Black, non-Hispanic population decreased by 13,219 or 8.7% , resulting in an overall increase of just 1,319 or a little less than 1% since 1990. Boston’s Hispanic population grew by an additional 22,869 from 2000 to 2010, resulting in an increase of nearly 65% since 1990. Boston’s non-Hispanic Asian/Pacific Islander population increased by an additional 8,237 from 2000 to 2010, resulting in an increase of 86% since 1990. If these current trends continue, Boston’s Hispanic population may soon be larger than Boston’s Black, non-Hispanic population.

Looking at the trends for the metro region, we see a small, consistent decrease (5%) in the metro region’s White, non-Hispanic population from 1990 to 2010 and significant increases in the metro region’s Black non-Hispanic population (40%), Hispanic population (112%), and non-Hispanic Asian/Pacific Islander population (151%). As a result, the metro region’s overall population is becoming more diverse, but remains predominantly White non-Hispanic (74.87%).

**National Origin and LEP:** The number of foreign born residents of Boston has increased by 52,370 or 46% since 1990 while the number persons with Limited English Proficiency increased by 35,866 or 52%. The trend is even more dramatic for the broader metro region where the number of foreign born increased by 80% and the number of persons with LEP increased by 72%.

**Sex:** There has been no significant change in Boston or in the metro region in the proportion of the population by sex since 1990.

**Families with Children and Age:** According to HUD’s data, Boston has seen a 5% decrease in the number of children under 18 and a 6% decrease in the number of elderly persons age 65+ from 1990 to 2010. In the metro region the number of children has increased by 8% and the

---

number of elderly 65+ has increased by 14.5%. Interestingly, the number of families with children in Boston has remained relatively flat since 1990 despite a 5% decline in the number of children, probably reflecting a continuing decrease in average family size during this period. More recent data seems to be indicating that Boston's elderly population is growing rather than declining, possibly reflecting empty nesters returning to the along with more of Boston's aging baby boomers staying in the City. There is also some evidence that the average household or family size may be growing.

**V.A.2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.**

*For question (2), local data and local knowledge may be particularly useful in answering this question. Include any geographic patterns in the location of owner-occupied properties compared to renter-occupied properties over time. Program participants may also describe trends in the availability of affordable housing in the jurisdiction and region for that time period.*

*Note: HUD did not provide data or maps for this question in this data set (AFFHT-0001). Instead, program participants were encouraged to use local knowledge in responding to this question.*

	City of Boston (Jurisdiction)		Boston-Cambridge-Newton, MA- NH Metro Area (part); Massachusetts	
	# units	%	# units	%
Owner-occupied	87,958	34.3%	968,899	60.1%
Renter-Occupied	168,336	65.7%	642,297	39.9%
Total	256,294		1,611,196	

Source: Table B25003: 2011-2015 ACS 5-year Estimates

	City of Boston (Jurisdiction)			
	2009	2015	# change	% change
Owner-occupied	88,468	87,958	-510	-0.6%
Renter-Occupied	148,929	168,336	19,407	13.0%
Total	237,397	256,294	18,897	7.8%

Source: Table B25003: 2011-2015 ACS 5-year Estimates and 2005-2009 ACS 5-year Estimates

About 16% of the total housing units in the metro region are located in the City of Boston. However, 26.2% of the total numbers of the metro region's rental units are located in Boston. Nearly 66% of the city's housing stock is renter-occupied, an increase from about 62.7% in 2009. Since 2009 the City has added 19,407 rental units to its housing stock and, according to the ACS data, has lost about 500 owner-occupied units. That decrease may be a reflection of the number of owner-occupied properties foreclosed on during the 2005-2008 housing crunch or it may be a function of the accuracy of the ACS survey as that number is within the margin of error for the ACS.

By contrast, Boston only accounts for about 9% of the metro region's owner-occupied housing, having just 34.3% of its housing units owner-occupied compared with a little more than 60% in the broader metro region.

Part of the reason for the disparity in the proportion of rental units located in Boston compared to the metro region is because nearly 54% of the total housing stock in the metro region (60% excluding Boston) is comprised of 1-family structures that are generally owner-occupied rather than renter-occupied. Boston has nearly twice the percentage of multi-unit properties in every property-size category compared with the metro region.

# Units In Structure	City of Boston (Jurisdiction)		Boston-Cambridge-Newton, MA-NH Metro Area (part); Massachusetts		Boston as % of Metro Region
	# units	%	# units	%	
1-unit	51,646	18.5%	1,023,521	53.8%	5.0%
2-4 units	106,704	38.3%	405,065	21.3%	26.3%
5-19 units	54,139	19.4%	204,682	10.8%	26.5%
20-49 units	26,058	9.4%	103,219	5.4%	25.2%
50+ units	39,538	14.2%	140,665	7.4%	28.1%
Mobile Home	289	0.1%	23,277	1.2%	1.2%
Total Units	278,521	100.0%	1,900,927	100.0%	14.7%

Source: Table B25024: 2011-2015 ACS 5-year Estimates

Owner-occupied housing units are not evenly distributed throughout Boston. Map 3 in Appendix D shows the variation in homeownership rate in Boston's neighborhoods. Increasing Boston's homeownership rate is a priority for the City of Boston, especially for low and middle-income households priced-out of Boston's hot housing market and to address the disparity in homeownership rates between White and non-White households with similar incomes. These disparities will be discussed elsewhere in this assessment.

With regard to subsidized housing, according to the Massachusetts Department of Housing and Community Development's Chapter 40-B Subsidized Housing Inventory, 18.3% of Boston's housing units are subsidized units for low-income households, not including mobile vouchers. Although Boston has just 10% of the state's total housing units, Boston has almost 20% of the state's total inventory of subsidized housing units. Chapter 40-B is a Massachusetts state law that allows developers seeking to build an affordable housing project in a community that has not met Chapter 40-B's 10% subsidized housing threshold to request state authorization to override local zoning restrictions.

	Total Units	Subsidized Units	%
Boston	269,324	49,324	18.3%
Massachusetts	2,692,186	250,863	9.3%
Boston as % of Massachusetts	10.0%	19.7%	

Source: DHCD 40-B Subsidized Housing Inventory as of 12/5/2014.



---

## Segregation/Integration

### V.B.i.1. Analysis

**V.B.i.1.a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.**

*For questions (1)(a) and (1)(b), refer to Table 3. Table 3 presents the dissimilarity index for the jurisdiction and region for white/non-white, black/white, Hispanic/white, and Asian/white populations for multiple census years.*

*This dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured.*

*Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Generally, when a group's population is less than 1,000, program participants should exercise caution in interpreting associated dissimilarity indices. Also, because the index measures only two groups at a time, it is less reliable as a measure of segregation in areas with multiple demographic groups.*

*For question 1(a) indicate whether the measures shown generally indicate that segregation in the jurisdiction and region is low, moderate or high for each racial/ethnic group represented in Table 3, and note which groups experience the highest levels of segregation.*

Overall the general level of racial and ethnic dissimilarity (whites compared to all non-whites) for the City of Boston and the metro region is fairly similar with Boston at the low end of the “high segregation” range at 56.83 compared to the metro region which is at the high end of the “moderate segregation” range at 53.49. The greatest degree of dissimilarity exists between black residents and white residents for both Boston (73.98) and the metro region (66.4). There is no substantial difference in dissimilarity between whites and Hispanics in Boston (60.06) and the metro area (61.40). There is a fairly low degree of dissimilarity (40.87) between whites and Asian/Pacific Islanders in Boston and a moderate degree of dissimilarity between (47.78) in the broader metro region.

**V.B.i.1.b. Explain how these segregation levels have changed over time (since 1990).**

*For question 1(b), refer to Table 3, which also provides dissimilarity index values for 1990, 2000, and 2010. Note whether the dissimilarity index values have increased or decreased over time. Increasing values may indicate increasing segregation, and decreasing values may indicate decreasing segregation.*

---

Since 1990, the general level of dissimilarity has decreased in both Boston (from 60.46 to 56.83) and in the metro (from 55.80 to 53.49). In Boston and the metro region dissimilarity for Blacks compared with whites decreased. Dissimilarity increased for Hispanics compared with whites in Boston and the metro region. For Asian/Pacific Islanders dissimilarity decreased in Boston but is trending upward in the metro region.

**V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.**

*For question (1)(c), refer to Maps 1, 2, 3, and 4. Maps 1, 2, 3, and 4 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. A dot density map (also known as dot distribution map) uses a color-coded dot symbols representing the presence of a specified number of individuals sharing a particular characteristic to show a spatial pattern. The presence of residential segregation may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots.*

*While dot density maps are useful in demonstrating residential patterns, they also have limitations. Dot placement does not represent actual addresses — rather individual dots are randomly located within a particular census block to match aggregate population totals for that block group. Note also that the data provided for national origin is based on census data for the 5 most populous "foreign born" populations by country of origin, however, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge. In addition, the "foreign born" population does not track exactly with the definition of national origin under the Fair Housing Act, which includes place of birth as well as place of ancestor's birth. LEP data shows residential segregation by language for speakers of the five most populous limited English proficient groups in the jurisdiction and region. Again, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge.*

*For question (1)(c), refer to Maps 1, 2, 3, and 4 to identify areas on the map that reveal clusters of race/ethnicity, national origin, or LEP groups, and areas where the map indicates are particularly integrated. In identifying those areas, and all areas throughout the tool, use commonly used neighborhood or area names.*

In the City of Boston, black residents are primarily concentrated in, around or near racially concentrated areas of poverty. This represents patterns of residential segregation. Geographically, black families are concentrated in the South Central part of the City of Boston boarded by Boylston Street, Massachusetts Avenue, Dorchester Avenue, Jamaicaaway, Seaver St., and Columbus Ave. (Roxbury, Dorchester). Within the R/ECAPs, racial segregation is extreme in the order of twenty blacks for every one white. Outside the City the converse is true. The concentration of whites is 20 plus to 1.

The deep clustering for black families is particular to this racial group. While there is some segregation of Hispanics in and around R/ECAPs, as a group they are far more widely

dispersed, but there is some moderate degree of clustering as compared to whites. There is a fair degree of integration with whites except within racially and ethnically concentrated areas of poverty which are sparsely occupied by whites.

Segregation by LEP group is significant for two language groups, Chinese and Spanish. The Chinese speaking population is concentrated in the City of Boston fairly heavily in Chinatown and the Spanish-speaking population is concentrated fairly heavily in East Boston and along Washington Street and Columbus Avenue in Roxbury.

Patterns of residential housing appear to indicate a lesser degree of segregation with respect to persons whose national origin is a Spanish-speaking country as compared to persons who are Chinese speaking who, similar to the pattern of LEP individuals, are concentrated in Chinatown. The exception for Spanish speakers is the concentration of residents in East Boston

**V.B.i.1.d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.**

*For question (1)(d), local data and local knowledge may be particularly useful in answering this question.*

The data indicates some concentration of subsidized housing in and around R/ECAPs. While it is understandable that housing would be built in these areas to address the lack of affordable housing for families of low income the problem is exacerbated by the consistent pattern of the concentration of both housing choice vouchers and project-based vouchers in and around these areas.

**V.B.i.1.e. Discuss how patterns of segregation have changed over time (since 1990).**

*For question (1)(e) refer to Maps 1, 2, and 3, and Tables 1 and 2. Map 2 depicts racial/ethnic dot density distribution for previous years (1990 and 2000). A comparison of the patterns shown in Map 2 to the patterns shown in Map 1 may reveal changes in patterns of segregation by race/ethnicity over time. For instance, the comparison may show that an area previously occupied predominantly by one racial/ethnic group is now more integrated. Consider these changes in conjunction with Tables 1 and 2 showing changes in overall demographics over time, as well as local knowledge about local policies, practices, trends, and investments to answer question 1(e). Consider also Maps 3 and 4, which depict dot density distribution of national origin and LEP populations.*

The most noticeable and significant change is the increase in the Hispanic population in East Boston.

---

V.B.i.1.f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

*For question (1)(f), local data and local knowledge may be particularly useful in answering this question.*

Rising rents in gentrifying neighborhoods may lead to further concentration of low-income persons of color in the small number of lower-rent neighborhoods in Boston and other metro region communities such as Brockton, Lawrence and Chelsea which tend to be areas that already have large populations of persons of color.

V.B.i.2. Additional Information

V.B.i.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

*Understanding the limitations of the HUD-provided data discussed in the introduction to these instructions, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).*

The Chinese Progressive Association submitted a valuable report on gentrification in Chinatowns in Boston, New York and Philadelphia. While the report does not show displacement of Asians from Boston's Chinatown (the Asian population continues to grow) it does show significant changes in the ethnic and economic makeup of the neighborhood. In 1990 Asians were 70% of the total population in Chinatown. From 1990 to 2010 the Asian population of Chinatown grew by about 950 or 20%, but the White population grew by nearly 6000 or 86%. As a result, by 2010 Asians made up just 46% of the total population of Chinatown and Whites made up 41% of the population. Further, according to the report, while median household income of the area has increased substantially, this prosperity is not shared by Chinatown's Asian population. The median household income for Asians dropped from a little less than \$17,000 in 2000 to just a little more than \$13,000 by 2009. In this case, the "desegregation" of the neighborhood is coming at the expense of a vibrant cultural and linguistic community.

V.B.i.2.b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

---

*For question (2)(b), program participants may include any additional relevant information related to their analysis of segregation in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation, and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as increasing integration.*

The City has been fortunate to receive two Choice Neighborhoods grants from HUD to support the transformation of two neighborhoods with concentrations of poverty. The \$20.5 million Quincy Corridor Choice Neighborhoods grant helped finance the redevelopment of the severely distressed 129 unit Woodledge/Morrant Bay subsidized housing development. It also financed the redevelopment of the long-vacant Pearl Meats Factory into the successful Bornstein & Pearl Food Production and Small Business Incubator along with many other improvements in the Grove Hall area. Two of the four census tracts (902 and 903) in this target area are R/ECAPS. Tenants were offered Section 8 vouchers to provide them with the opportunity to relocate from the development if they preferred. Forty tenants chose to relocate.

More recently the Boston Housing Authority and the City of Boston were awarded a \$30 million Choice neighborhoods grant to support the redevelopment of the Whittier public housing development and the transformation of the surrounding neighborhood. All of the census tracts in this target area are R/ECAPS. Map 2 in Appendix D shows these two Choice Neighborhood area with R/ECAPS.

#### **V.B.i.3. Contributing Factors of Segregation**

*For question (3), identify all significant contributing factors. Consider the non-exhaustive list of factors provided and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.*

- X Community Opposition
- X Displacement of residents due to economic pressures
- X Lack of community revitalization strategies
- X Lack of private investments in specific neighborhoods
- X Lack of public investments in specific neighborhoods, including services or amenities
- X Lack of regional cooperation
- X Land use and zoning laws
- X Lending Discrimination
- X Location and type of affordable housing
- X Occupancy codes and restrictions
- X Private discrimination

---

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

### V.B.ii.1. Analysis

#### V.B.ii.1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

*For question (1)(a), refer to Maps 1, 3, and 4, which include outlined census tracts that meet the threshold criteria for racially or ethnically concentrated areas of poverty (R/ECAPs). The area within the outline meets the definition of an R/ECAP, as set forth in the rule at 24 C.F.R. § 5.152.*

Utilizing Maps 1, 3, 4 there were 8 identified R/ECAPS the City of Boston in 2010. There are situated in Charlestown, East Boston, the South End/Chinatown, South Boston, Roxbury, Jamaica Plain, and Dorchester.

The R/ECAP in Charlestown is bounded by Chelsea Street, Mt. Vernon St., Chestnut Street, Tremont Street, Monument Street, Bunker Hill Street, Corey Street and Medford Street. It include some but not all of the BHA's Charlestown public housing development.

The East Boston R/ECAP is bounded by Boston Harbor on the West, Lewis, S. Bremen, Sumner, Havre, Meridian, Central Street and Bonder Street on the East, the northern perimeter of Umana-Barnes Middle School on the north and Lewis Mall Harbor Park to the south.

The South End R/ECAP is bounded by Tremont, Charles, Boylston, Lagrange, Beach and Hudson Street, the Massachusetts Pike, Interstate 90, Interstate 93 and E. Berkeley Street.

The South Boston R/ECAP is bounded by Dorchester Avenue, Gen Devine Way, Old Colony Ave., Columbia Road, and the MBTA railway track to the Southwest. The R/ECAP primarily comprises the BHA Mary Ellen McCormack public housing development.

The Harbor Point/UMass R/ECAP is bounded by Morrissey Blvd. on the West and Dorchester Bay on the South and East and Day Blvd. and Carson Beach to the North.

The Roxbury R/ECAP is bounded by Malcolm X Blvd., Roxbury Street, Bartlett Street, Washington Street, Elmore Street, Munroe Street, Martin Luther King, Jr. Blvd., Warren Street, Moreland, Fairland and Mt. Pleasant Street, Vine Street, Dudley Street, Hampden Street, Keegan and Albany Street, Crosstown Drive, E. Lenox Street, Harrison Avenue, Northampton Street, Shawmut Avenue, Camden Street, the South West Corridor to Ruggles Street, Huntington Avenue, St Alphonsus Street and Tremont Street to Malcolm X Blvd.

The Dorchester R/ECAP is bounded by Harvard Street, Talbot Avenue, MBTA railway tracks to Woodrow Avenue, Blue Hill Avenue and Morton Street to Harvard Street.

The Jamaica Plain R/ECAP is bounded by Heath, Bromley, Heath Street to Columbia Avenue to New Heath Street, Marcella Street, Washington Street, Westminster Avenue, Walnut Avenue, School Street, Washington Street, Atherton Street, the Southwest Corridor, Centre street, Creighton Street, Bynner Street, Day street and across the Hennigan School to Heath Street.

---

---

**V.B.ii.1.b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?**

*To answer question (1)(b), use Maps 1, 3, and 4 and Table 4. Maps 1, 3 and 4 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. These maps also include outlined overlays of R/ECAPs. The presence of residential segregation in R/ECAPs may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots. Table 4 shows the percentage of persons living in R/ECAPS with certain protected characteristics (race/ethnicity, families with children, national origin) in the jurisdiction and the region. Note that the percentages reflect the proportion of the total population living in R/ECAPs that has a protected characteristic, not the proportion of individuals with a particular protected characteristic living in R/ECAPs. Table 4 can be compared to Table 1, which shows the total population in the jurisdiction and region for each of the groups shown in Table 4.*

For both the region and the jurisdiction two protected classes disproportionately reside in R/ECAPs. Twenty three thousand seven hundred ninety-one (23,791) blacks reside in the R/ECAPs in the City of Boston as compared to twelve thousand five hundred twenty-two (12,522) white non-Hispanic residents. Nineteen thousand three hundred ninety-six (19,396) Hispanics reside in R/ECAPs in the City of Boston. The respective percentages of total population residing in R/ECAPs for blacks and Hispanics are 36.1% and 29.4%. This pattern is consistent with the region in which 29,547 blacks and 47,375 Hispanics reside in R/ECAPs. These percentages are 25.4% and 40.8%.

In the City of Boston, the ten most populous groups by national origin makeup 22.16% or 14,610 of the population residing in R/ECAPs. The three most prominent national identities are Dominican Republic, 5,203 (7.89%), China (excluding Hong Kong and Taiwan), 4,242 (6.43%) and Haiti, 1489 (2.26%). For the region while the relative percentages vary the relative ranking remains the same. Residents from the Dominican Republic compose 12.69% of the population in R/ECAPS in the region at 14,741, residents from China compose 3.76% at 4,366 and residents from Haiti compose 2.23% at 2,586.

---



---

**V.B.ii.1.c. Describe how R/ECAPs have changed over time (since 1990).**

*To answer question (1)(c), refer to Maps 1, 2, 3, and 4. Map 1 shows the outlines of current R/ECAPs. Map 2 shows the outlines of R/ECAPs in past years (1990 and 2000). Compare the current R/ECAP outlines with previous R/ECAP outlines and describe whether R/ECAPs have remained constant, whether new R/ECAPs have emerged, or whether certain R/ECAPs no longer exist. Maps 1, 2, 3, and 4 also show dot density distributions by race/ethnicity, national origin and LEP, including R/ECAP outlines. Note whether the maps show any changes in areas that have moved in or out of R/ECAP status over time and the groups most affected by R/ECAPs.*

In the City of Boston in the 1990s there were four R/ECAPs. The largest extended from Beacon Street down Milk Street in the central part of the City to Devon Street on the south side of Grove Hall. This area also extended northwest to encompass Roxbury Crossing and Roxbury. There were three other separate areas; in the vicinity of Harambee Park along Blue Hill Avenue in Mattapan, in the vicinity of Columbus Avenue and Center Street covering portions of Jamaica Plain and Roxbury. Outside the city R/ECAPS were located in Cambridge, Chelsea, Lowell, Lawrence and Brockton.

Between 1990 and 2010 the total area of the city designated as a R/ECAP decreased. The large R/ECAP extending from downtown Boston to Grove Hall in 1990 segmented and by 2010 had substantially contracted. The area bounded by Beacon Street contracted to Boylston and Beach Street, in Chinatown to the North and E. Berkeley Street, in the South End, to the south. That portion of the R/ECAP that extended from Grove Hall contracted to Quincy Street, in Dorchester. The Dorchester R/ECAP decreased in size while the Jamaica Plain R/ECAP retained relatively the same size but changed in configuration. The R/ECAP in East Boston and South Boston first emerged in the 2000 census data and the Charlestown R/ECAP first emerged in the 2010 census data.

The areas with R/ECAPS now include Lawrence, Lynn, Lowell, Chelsea, Cambridge and Brockton. By 2000 while the R/ECAPs in the central part of the City of Boston reflect some reconfiguration the overall appearance is that they have expanded slightly. In addition a R/ECAP is present in East Boston and South Boston. A presence of public housing developments in these areas probably contributes to these areas' emergence as R/ECAPs. The number of R/ECAPs outside the City of Boston had increased to six.

---



---

**V.B.ii.2. Additional Information****V.B.ii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.**

*Understanding the limitations of the HUD-provided data discussed in the instruction's introduction, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).*

We do not have additional data on other protected characteristics for the R/ECAP areas compared to non-R/ECAP areas. Perhaps the most important factor in understanding Boston's current R/ECAPs is an understanding of the history of segregation and fair housing in Boston. Mac McCreight from Greater Boston Legal Services provided a memo outlining the history of some key fair housing issues in Boston and Nadine Cohen of Greater Boston Legal Services provided a memo outlining the history of redlining, mortgage discrimination and Foreclosure in Boston. Copies of these two memos are provided in Appendix D.

An especially important factor in understanding how certain areas became R/ECAPs is the decisions made regarding the siting of public housing developments. As Mac McCreight points out, decades ago certain very large public housing developments were intentionally sited in White neighborhoods to serve those White residents while others were sited in Black neighborhoods to serve that community. These large developments often accounted for all or most of the housing units and most of the total population of the census tract in which they were located. Over time, the population served by public housing went from being a largely working poor population to being an extremely low-income population. Similar trends applied to many of the older privately-owned HUD-subsidized multifamily rental projects. Most of the Census tracts that are now R/ECAPs became R/ECAPs due to the siting of a large public housing or other large subsidized developments in a racially concentrated area and the shift over time to a lower and lower income population. This trend was further exacerbated by the termination of federal funding for new family public housing development and the lack of subsidized multifamily housing development in non-segregated, middle-income neighborhoods.

An important factor in the segregation of Boston's residential neighborhoods was the redlining and discriminatory lending policies that resulted in banks refusing to lend to Blacks in certain predominantly White neighborhoods and selectively making FHA loans available to Blacks in targeted neighborhoods such as Mattapan. As Nadine Cohen points out, Mattapan went from being a predominantly Jewish neighborhood to a majority Black neighborhood in just a decade.

---

---

V.B.ii.2.b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

*For question (2)(b), program participants may include any additional relevant information related to their analysis of R/ECAPs in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as transforming R/ECAPs by addressing the combined effects of segregation and poverty. Relevant information may also include local assets and organizations.*

The Charlestown, South Boston, East Boston and the Jamaica Plain R/ECAPs each include a large public housing development. With the exception of East Boston, which has already undergone redevelopment, the BHA intends to pursue redevelopment schemes for these properties which will utilize private investment to both bring market rate housing to the sites and preserving existing public housing units. Public housing residents will benefit from the facilities and services provided to market rate tenants as requirement the development agreement and ground lease. This should over time reduce the number of R/ECAPs while preventing the displacement of the existing low-income public housing residents.

#### V.B.ii.3. Contributing Factors of R/ECAPs

*For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with R/ECAPs, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.*

- X Community Opposition
    - Deteriorated and abandoned properties
    - Displacement of residents due to economic pressures
    - Lack of community revitalization strategies
    - Lack of private investments in specific neighborhoods
    - Lack of public investments in specific neighborhoods, including services or amenities
    - Lack of regional cooperation
    - Land use and zoning laws
  - X Location and type of affordable housing
    - Occupancy codes and restrictions
  - X Private discrimination
-

## Disparities in Access to Opportunity

### a. Educational Opportunities

#### V.B.iii.1. Analysis

##### V.B.iii.1.a. Educational Opportunities

*For the questions in (1)(a), use the School Proficiency Index in Table 12 in Appendix B and refer to Map 7 in Appendix A. The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams. Map 7 consists of three sub-maps, showing the spatial distribution of racial/ethnic and national origin groups and families with children overlaid by shading that shows school proficiency levels for the jurisdiction and the region. The maps also include R/ECAP outlines.*

**V.B.iii.1.a.i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.**

*To answer question (1)(a)(i), examine the School Proficiency Index, by race/ethnicity, and Map 7, by race/ethnicity, national origin, and family status, to identify differences in access to proficient schools by protected characteristic.*

Note: We caution readers that HUD's School Proficiency Index is based on 5 year old (2011-2012) data. We do not know if HUD's data used Boston's former attendance boundaries or used an assumed 1.5 mile boundary in developing the index scores for Boston. In any case, the MCAS scores for the schools on which the index is based do not accurately reflect the educational opportunities of Boston's current public school students due to changes in Boston's school assignment policies and changes in school performance since 2011-2012.

Boston Public Schools (BPS) offers a customized list of school choices for every family based on their home address. It includes every school within a one-mile radius of their home plus, as needed, nearby schools that have the highest levels of MCAS performance and growth. Every family will have a choice of at least six schools; most will have between 10 and 14 choices. This ensures that every family has access to high-quality schools, no matter where they live.

Families may also select any citywide school, and some families may have regional options through the Metropolitan Council for Educational Opportunity (METCO), as well. For more information on the BPS's current assignment policy visit the BPS website at:

<https://www.bostonpublicschools.org/assignment>

Boston's schools score extremely poorly on HUD's School Proficiency Index, basically scoring less than 25 out of a possible score of 100 for all racial and ethnic groups. Opportunities for Whites and Asians scored marginally better than for Blacks and Hispanics but none are remotely satisfactory. It is common knowledge that Boston's Public Schools, like many big City

school systems, faces significant challenges that schools in more affluent communities do not have to deal with. The battles over court-ordered busing to desegregate Boston's schools resulted in many white and middle-class families leaving the public school system. This trend was further exacerbated by frustration with the results of the school's lottery-based assignment system. Boston's school system now serves a population that is disproportionately lower-income families of color, essentially resegregating Boston's school system. According to a Diversitydata.org brief, when comparing the 100 largest metro areas in the U.S, Boston came in fourth for most segregated amongst Hispanic/Latino primary school students.<sup>3</sup> Over the past several years BPS has made significant strides to improve the quality of the schools as well as making major changes to its school assignment system to improve families' choices and satisfaction. More middle-income, white and Asian families are electing to send their children to Boston's public schools.

We do not deny that many of Boston's public schools are still underperforming by any standard, but HUD's Proficiency Index (SPIs) and the associated maps are really not particularly useful in conducting a meaningful assessment of educational opportunity in Boston nor in developing goals to address the system's shortcomings from a Fair Housing perspective. We have requested additional data on school performance and on the implementation of the updated school assignment system from the Boston Public Schools. We have also very recently received some helpful and very detailed analysis from the Center for Law and Education which does show that schools with lower (SPIs) tend to be clustered in neighborhoods with higher non-White and lower-income populations. They also show that most of the lower performing schools tend to have more students from lower-income families and students of color than the highest performing schools. We will incorporate this additional information into the final Assessment of Fair Housing. However, we do not propose to make the analysis of educational opportunities and the improvements needed in Boston's Public Schools a major focus of this Assessment of Fair Housing. These issues are extremely important but need to be dealt with separately, on their own terms, by stakeholders and professionals with more expertise on educational issues.

**V.B.iii.1.a.ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.**

For question (1)(a)(ii), refer to Map 7 by race/ethnicity, national origin, and family status to assess how residency patterns relate to the location of proficient schools. Note that, to the extent the questions require consideration of middle and high schools, local policies and practices, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant.

As explained above, the HUD data and maps do not provide sufficiently current and accurate data to enable us to answer this question. Boston's K-8 school assignments are based on

---

<sup>3</sup> McArdle N., Osypuk T., & Acevedo-Garcia D., (2010, Sept). *Prospects for Equity in Boston's School Assignment Plan* (Issue Brief). Retrieved from [http://diversitydata.org/Publications/Prospects\\_for\\_Equity\\_in%20Boston\\_Schools.pdf](http://diversitydata.org/Publications/Prospects_for_Equity_in%20Boston_Schools.pdf)

policies that are inconsistent with the proximity assumptions on which HUD's Index is based. All high schools are options for all students citywide. Boston also has three competitive exam schools, Boston Latin Academy, Boston Latin School and the John D. O'Bryant School of Mathematics and Science whose students are admitted on the basis of scores on an entrance exam and their Grade Point Average. A recent report<sup>4</sup> on admissions to Boston's exam schools shows that majority white neighborhoods and majority white schools all have exam school admission rates above 50% while majority Black and Hispanic/Latino neighborhoods have exam school admission rates below 40%.

V.B.iii.1.a.iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school Which protected class groups are least successful in accessing proficient schools?

*Question (1)(a)(iii), may be answered using local data or local knowledge. Program participants should consider whether local school policies provide for alternative means of access to schools that are not reflected in the HUD-provided data.*

Boston Public Schools (BPS) offers a customized list of school choices for every family based on their home address. It includes every school within a one-mile radius of their home plus, as needed, nearby schools that have the highest levels of MCAS performance and growth. Every family will have a choice of at least six schools; most will have between 10 and 14 choices. This ensures that every family has access to high-quality schools, no matter where they live. Families may also select any citywide school, and some families may have regional options through the Metropolitan Council for Educational Opportunity (METCO), as well. For more information on the BPS's current assignment policy see the BPS website at: <https://www.bostonpublicschools.org/assignment>

We have requested but have not yet received data on the outcomes of this new selection system. We will incorporate this data when received into the final version of the Assessment of Fair Housing.

---

<sup>4</sup> A Broken Mirror: Exam School Admissions Fail to Reflect Boston's Diversity.

## b. Employment Opportunities

### V.B.iii.1.b. Employment Opportunities

*For the questions in (1)(b), refer to the Jobs Proximity Index and Labor Market Index in Table 12, and to Maps 8 and 9. The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity. The Labor Market Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map 8 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows the jobs proximity measure for the jurisdiction and the region. The map also includes R/ECAP outlines. Map 9 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows labor engagement for the jurisdiction and the region. The map also includes R/ECAP outlines.*

#### V.B.iii.1.b.i. Describe any disparities in access to jobs and labor markets by protected class groups.

*To answer questions (1)(b)(i)-(iii), examine the indices' values by race/ethnicity, and Maps 8 and 9, by race/ethnicity, national origin, and family status, to identify differences in proximity to jobs and labor market engagement by protected characteristic.*

The City of Boston is the economic Hub of the New England region. Boston is home to many of the nation's top colleges and universities, major hospitals, and finance and insurance companies. Boston is also a top tourism destination with hundreds of hotels and thousands of restaurants. According to the Boston Planning and Development Agency's **Boston's Economy Report 2017**, Boston has over 750,000 jobs. However, about 62% of the jobs located in Boston are held by people who live outside Boston and commute into the city every day for work. Conversely, about 32% of Boston's residents commute to jobs outside the City. This may explain in part why HUD's Jobs Proximity Index scores both the City of Boston and the Boston-Cambridge-Newton metro region only in the 40s (out of 100) despite the very large number of jobs in the City<sup>5</sup>. Everyone commutes to work. The jobs proximity index is slightly better for Whites than for other racial and ethnic groups but not significantly better. The index shows no significant differences between Blacks, Hispanics and Asians and the figures are not valid for extremely small populations such as Boston's Native American population. The three variations of Job Proximity maps (race/ethnicity, national origin and family status) are not particularly useful in further interpreting the differences in proximity to jobs. They seem to simply mirror the geographic distribution of the population categories.

The Labor Market Index clearly shows a disparity in access to labor markets based on race and ethnicity. The Labor Market Index scores Whites substantially higher than all other racial/ethnic groups, in the 70s out of 100, in both Boston and the metro region and in the general population

---

<sup>5</sup> Note that in a recently issued document summarizing known issues with AFFH-T data, HUD acknowledged that "there were errors in calculating and coding the Jobs Proximity Index". We do not know if the errors impact the interpretation offered here.



as well as in the population below the poverty line. Asians score 63 among Boston's general population and 72 in the metro region but only 55 among the poverty population in Boston and 62 in the poverty population in the metro region. Blacks score in the 30s in Boston and have nearly identical Index scores as Hispanics/Latinos (in the 40s) in the metro region. As with the Jobs Proximity maps, the three variations of the Labor Market Index maps (race/ethnicity, national origin and family status) are not particularly useful in further interpreting the differences in proximity to jobs because they just seem to mirror the geographic distribution of the population categories.

**V.B.iii.1.b.ii. How does a person's place of residence affect their ability to obtain a job?**

*To answer questions (1)(b)(i)-(iii), examine the indices' values by race/ethnicity, and Maps 8 and 9, by race/ethnicity, national origin, and family status, to identify differences in proximity to jobs and labor market engagement by protected characteristic.*

The Jobs Proximity Index shows little difference by race and ethnicity whether they reside in the City of Boston or in the broader metro region. With regard to the Labor Market Index, there is little difference for Whites or Hispanic/Latinos whether they live in Boston or the broader metro region. Asians score about 9 points higher in the metro region than in Boston, almost as high as Whites, Blacks score about 14 points higher on the index in the metro region than in Boston. As stated above, the maps are not particularly useful in answering these questions.

The disparity in access to jobs by race and ethnicity as well as by sex is particularly evident in the construction industry. Construction projects in Boston's neighborhoods of color often employed a labor force comprised primarily of white male workers from outside of Boston or even from out of state, denying quality employment opportunities to the residents of the neighborhood. In response to this problem, in 1983 Boston adopted the Boston Resident Jobs Ordinance which set employment standards for Boston residents, people of color, and females on large scale construction projects.. The original ordinance stated that private development projects over 100,000 square feet and any public projects had to meet the following employment standards:

- at least 50 percent of the total work hours in each trade must go to Boston residents
- at least 25 percent of the total employee work hours in each trade must go to people of color, and
- at least 10 percent of the total employee work hours in each trade must go to women.

In 2017 the Ordinance was amended to expand the covered project threshold and raise the employment standards. Private development projects over 50,000 square feet and any public development project must meet the following employment standards:

- at least 51 percent of the total work hours of journey people and fifty-one percent of the total work hours of apprentices in each trade must go to Boston residents;
- at least 40 percent of the total work hours of journey people and forty percent of the total work hours of apprentices in each trade must go to people of color and;

- at least 12 percent of the total work hours of journey people and twelve percent of the total work hours of apprentices in each trade must go to women.

The Boston Residents Jobs Policy (BRJP) office and the Boston Planning and Development Agency (BPDA) will both monitor projects in the City of Boston under the new Ordinance. All projects being monitored by BRJP or BPDA are subject to review by the Boston Employment Commission (BEC).

Like many American cities, Boston has seen the stark effects of income inequality. The Mayor's Office of Workforce Development, OWD tackles this problem head-on by aiming workforce funds where the need is greatest. The OWD's recently commissioned labor market report, found that the city's highest rates of unemployment clustered around Dorchester, Roxbury, and Mattapan. These neighborhoods have high percentages of Black and Hispanic/Latino residents. These same neighborhoods receive intensive support from the OWD-administered Neighborhood Jobs Trust (NJT). While residents from every neighborhood of Boston have been helped by NJT-funded job training programs, the NJT's recent report found that over half hailed from Dorchester, Roxbury, and Mattapan.<sup>6</sup>

**V.B.iii.1.b.iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?**

*To answer questions (1)(b)(i)-(iii), examine the indices' values by race/ethnicity, and Maps 8 and 9, by race/ethnicity, national origin, and family status, to identify differences in proximity to jobs and labor market engagement by protected characteristic.*

As described in the previous questions, Blacks scored the lowest on the Labor Market index by a large margin, followed by Hispanics. Asian scored better than Blacks and Hispanics, but somewhat lower than Whites. HUD did not provide tables for these measures by national origin or family status groups and the maps were not particularly useful in identifying disparities by these categories.

---

<sup>6</sup> City of Boston, Mayor's Office of Workforce Development. (2016). Annual Report FY16. Retrieved from [https://owd.boston.gov/wp-content/uploads/2017/01/DES92-OWD\\_Annual\\_ReportF.pdf](https://owd.boston.gov/wp-content/uploads/2017/01/DES92-OWD_Annual_ReportF.pdf).

---



## c. Transportation Opportunities

### V.B.iii.1.c. Transportation Opportunities

*For the questions in (1)(c), refer to Table 12 (Low Transportation Cost Index (Please note there is no corresponding map for the Transportation Cost Index. HUD anticipates a map may be provided in later releases of the Data Tool.) and the Transit Trips Index) and Maps 10 and 11. The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. Map 10 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows transportation access at the neighborhood level. These maps also include R/ECAP outlines. Map 11 shows residency patterns of racial/ethnic, national origin, and families with children overlaid by shading that shows low transportation costs at the census tract level.*

**V.B.iii.1.c.i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.**

*To answer questions (1)(c)(i) and (ii), examine the Low Transportation Cost Index and Transit Trips Index values in Table 12, by race/ethnicity, and Maps 10 and 11, by race/ethnicity, national origin, and family status, to identify differences in access to transportation by protected characteristic.*

Based on HUD's data, there would appear to be no disparities by race and ethnicity in either the Transit Trips Index or the Low Transportation Cost Index within the City of Boston. All scores are in the 95+ out of 100 range, indicating that all racial and ethnic groups use public transportation frequently and that there is low cost public transportation in close proximity. HUD did not provide tables showing data for these indices by national origin or family status and the maps were not useful in identifying differences by national origin or family status.

We received extensive testimony at the public hearings and additional written testimony contesting these findings. Residents testified that the subways and commuter rail lines (rapid transit) primarily serve upper-income and White neighborhoods while Black and Hispanic/Latino neighborhoods have to rely on slower and less convenient bus service. Residents pointed out that transit trips into downtown Boston often originate in the suburbs or wealthier predominantly White neighborhoods and that by the time the bus or train arrives in Boston's poorer, predominantly minority neighborhoods there may be no room or standing room only. Residents living in Mattapan for example also experience very long commutes via public transportation because of the lack of subway stop access and a heavier reliance on multiple buses per commute compared to other Boston neighborhoods.

At the metro region level, the scores on both of HUD's transportation indices were about 5 points lower than for the City of Boston, but still very high, in the high 80s and low 90s out of 100. There were no significant differences by race/ethnicity for Blacks, Hispanics or Asians, but oddly, White non-Hispanics scored significantly lower on both indices. This may be an error or it

may reflect the fact that more Whites drive to work or may use the more expensive commuter rail service rather than subways and busses.

V.B.iii.1.c.ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

*To answer questions (1)(c)(i) and (ii), examine the Low Transportation Cost Index and Transit Trips Index values in Table 12, by race/ethnicity, and Maps 10 and 11, by race/ethnicity, national origin, and family status, to identify differences in access to transportation by protected characteristic.*

Based solely on Table 12 and Maps 10 and 11 all racial/ethnic, national origin and family status groups would appear to have reliable, affordable transportation connections between their place of residence and opportunities. However, residents in several neighborhoods testified about lengthy and/or inconvenient commutes requiring multiple connections and waits. This is borne out by data in Go Boston 2030, a recently issued report and Action Plan on transportation issues in Boston. Boston's Dorchester, Mattapan and Roxbury neighborhoods have large concentrations of Black and Hispanic/Latinos and for the most part are only served by buses. Predominantly White neighborhoods such as Back Bay, Beacon Hill, Fenway and the West End have excellent access to rapid transit services. Chinatown is also well-served by public transit while the Vietnamese population in Dorchester has fewer transit options.

V.B.iii.1.c.iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

*For question (1)(c)(iii), program participants should consider whether transportation-related local programs, policies, and practices affect a person's access to proficient school, jobs, and other areas with opportunities. In answering this question, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant. Program participants should consider whether transportation systems designed for use of personal vehicles impact the ability of protected class groups' access to transportation due to the lack of vehicle ownership.*

Residents of the Boston metro region are fortunate to be served by the Metropolitan Boston Transit Authority's (MBTA) extensive network of commuter rail, subway and bus services. The MBTA is the nation's 5th largest public transit system and serves 175 member communities. The system does a fairly good job of getting people from their community or neighborhood to one of Boston's two downtown transit Hubs (South Station and North Station) every morning and back home every evening. It works less efficiently for those who either need to commute in the opposite direction at peak times or who work in evening or off-peak hours. It can also be difficult to get from one adjacent neighborhood to another, often requiring either a trip into a downtown hub to switch to an outbound train on another line or a bus trip between stations.

Also, the recently issued Resilient Boston report shows that it is mostly, but not exclusively, neighborhoods with large populations of Blacks and Hispanics/Latinos that have commutes longer than 60 minutes. Over 25% of residents in Mattapan have commutes over 60 minutes. Other neighborhoods with large percentages of their residents with commutes times longer than 60 minutes include Hyde Park, Dorchester, East Boston, Roxbury, Roslindale and West Roxbury.

The MBTA is an expensive, ageing system that does not have the capital needed to expand needed services throughout Boston. The MBTA did propose a cut to late night bus services, which resulted in a complaint to the Federal Transit Administration that the cuts in services would disproportionately impact low income riders of color.<sup>7</sup>

---

<sup>7</sup> Dungca, Nicole. "US faults MBTA for Ending Late Night Ride Service." Boston Globe, 4 March 2016. <https://www.bostonglobe.com/metro/2016/03/04/mbta-failed-consider-impact-cutting-late-service-minorities-and-low-income-residents-says-federal-agency/psMKdn0RCwO8mi6ajAMr6N/story.html>

---

## d. Low Poverty Exposure Opportunities

### V.B.iii.1.d. Low Poverty Exposure Opportunities

*For question (1)(d), refer to the Low Poverty Index in Table 12 and Map 12. The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. Map 12 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that depicts poverty levels for the jurisdiction and the region. The map also includes R/ECAP outlines.*

#### V.B.iii.1.d.i. Describe any disparities in exposure to poverty by protected class groups.

*To answer questions (1)(d)(i)-(iii), examine the Low Poverty Index values, by race/ethnicity, and Map 12, by race/ethnicity, national origin, and family status, to identify differences in poverty by protected characteristic.*

As shown in Table 12, the Low Poverty Exposure scores for Boston roughly follow the same trends as the poverty rates by race and ethnicity. Whites have the lowest poverty rates and the highest score on the Low Poverty Exposure index, followed by Asians, Hispanic/Latinos and Blacks. The same general ranking holds true for Boston's population under the poverty line but, as expected, the scores are lower across the board.

Low Poverty Exposure Index scores are higher across all racial/ethnic categories in the metro region than in the City of Boston. The scores are again highest for Whites followed by Asians. One difference in the trend for the metro region compared to Boston is that Blacks scored marginally higher than Hispanics in the metro region.

There are no tables for the Low Poverty Index by national origin or family status and Map 12 is not very useful in identifying disparities by these other categories of protected classes.

These Low Poverty Exposure scores are essentially just another reflection of the degree of concentration of poverty and the relative levels of racial/ethnic segregation in Boston and the metro region.

#### V.B.iii.1.d.ii. What role does a person's place of residence play in their exposure to poverty?

*To answer questions (1)(d)(i)-(iii), examine the Low Poverty Index values, by race/ethnicity, and Map 12, by race/ethnicity, national origin, and family status, to identify differences in poverty by protected characteristic.*

Low Poverty Exposure Index values are lower across the board in the City of Boston compared to the broader metro region. Blacks in particular fare much better on the Low Poverty Exposure Index in the metro region compared to the City of Boston. As stated above, there are no tables showing the low poverty index for national origin or family status and the map is of limited utility in identifying differences in poverty by these protected class categories.

---

**V.B.iii.1.d.iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?**

*To answer questions (1)(d)(i)-(iii), examine the Low Poverty Index values, by race/ethnicity, and Map 12, by race/ethnicity, national origin, and family status, to identify differences in poverty by protected characteristic.*

Of the racial and ethnic categories, Blacks are the most negatively affected by lower Low Poverty Exposure Index scores, followed by Hispanics and Asians. Whites are the least affected. The map is not particularly helpful in identifying differences in poverty exposure by national origin or family status.

**V.B.iii.1.d.iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas**

*For question (1)(d)(iv), to the extent local policies and practices are discussed, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant.*

Historically, the lack of affordable housing opportunities in the metro region outside of Boston and a few other inner core cities has limited access to low poverty communities. Many of these communities have zoning restrictions that make it difficult to site larger scale multi-family rental. Higher land costs, sales prices and rents in some of the most desirable communities have also risen for lower-income persons of color seeking housing in these communities. The state's Chapter 40-B legislation has enabled developers to override local zoning obstacles in order to build affordable housing in communities that have not met Chapter 40-B's 10% affordable housing threshold.

In addition, rental voucher holders are seldom able to obtain housing in low poverty/high opportunity areas because these areas often have very few units available at rents under HUD's Fair Market Rent (FMR) levels. These areas often have their own zoning restrictions against multi-unit or multi-level apartment buildings. Community opposition or Nimbyism in high opportunity areas also limits affordable housing opportunities in Boston's surrounding suburbs. This holds true for the metro region as well as for higher opportunity areas within the City of Boston as well. The Boston Housing authority has utilized the flexibility in HUD the Section 8 regulations to set its Section 8 Payment Standard at the maximum 110% of FMR. However, rents in many areas of Boston and the metro region remain out of reach for voucher holders. The tradeoff of the higher FMR is that the Boston Housing Authority will have to fund fewer vouchers as a result of the higher cost per voucher. HUD recently proposed to base its FMRs on smaller zip-code based geographies rather than the entire metro area. This would result in higher FMR's for some zip codes and lower FMRs in others. Our research shows that the higher zip code-based FMRs are still not high enough to enable voucher holders to access housing in any significant number of higher opportunity areas. Also, this would further increase costs for the BHA, further limiting the number of vouchers the BHA can afford to issue.

---

## e. Environmentally Healthy Neighborhood Opportunities

### V.B.iii.1.e. Environmentally Healthy Neighborhood Opportunities

*For question (1)(e)(i) and (ii), refer to the Environmental Health Index in Table 12 and Map 13. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. Map 13 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction and the region. The map also includes R/ECAP outlines. To answer the questions, examine the Environmental Health Index values, by race/ethnicity, and Map 13, by race/ethnicity, national origin, and family status, to identify differences in exposure to environmental health hazards by protected characteristic. While the Environment Health Index is limited to issues related to air quality, program participants may also discuss other indicators of environmental health, based on local data and local knowledge. Environmental-related policies may include the siting of highways, industrial plants, or waste sites.*

### V.B.iii.1.e.i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

*Note: The HUD-provided Environmental Health Index (see Table 12 and Map 13) is derived from the EPA's 2005 National Air Toxics Assessment (NATA). Index values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health and the better the environmental quality of a neighborhood. Unfortunately, the data is too old to be relevant. Furthermore, in its Overview of Methods for the NATA, the EPA cautions that "NATA results should not be used independently to characterize or compare risk at local levels (e.g., between neighborhoods), nor should they be used to estimate exposure or health risks for individuals or groups within small geographic areas...". We will therefore not be utilizing HUD's Environmental Health Index for this section of the Assessment of Fair Housing.<sup>8</sup>*

### Elevated Blood Lead Levels

Instead, we will utilize more recent and more relevant data on the incidence of Elevated Blood Lead Levels obtained from the Massachusetts Environmental Public Health Tracking (MEPHT) portal (<https://matracking.ehs.state.ma.us/>). We have retrieved data on the rate per thousand of children from 0-72 months with blood lead levels of 5 ug/dl or higher from 2010 to 2015. The data are shown at the census tract level on the Elevated Blood Lead Levels Map 1 in Appendix D: Locally-Provided Maps.

### Asthma Data

In addition to Elevated Blood Lead Data, the Boston Public Health Commission has provided data on asthma hospitalization and Emergency Room visits by race and ethnicity and by

---

<sup>8</sup> Note that in a recently issued document summarizing known issues with AFFH-T data, HUD acknowledged that "there were errors in calculating and coding the Environmental Health Index".

neighborhood. The tables below show that Blacks clearly have the highest rates of asthma ER visits and hospitalizations. Hispanics/Latinos also have rates that are above the citywide rates.

#### Asthma Emergency Department Visits by Race/Ethnicity, 2015

	AAR per 10,000 residents	95% Confidence Intervals	Compared to reference group
Boston	101.2	(98.7-103.7)	n/a
Asian	26.0	(22.2-30.4)	lower
Black	210.3	(202.8-218.2)	higher
Latino	124.4	(118.2-130.9)	higher
White	41.0	(38.7-43.4)	Reference

#### Asthma Hospitalizations by race/Ethnicity, 2015

	AAR per 10,000 residents	95% Confidence Intervals	Compared to reference group
Boston	21.9		n/a
Asian	9.4	(7.2-12.2)	similar
Black	40.2	(37.0-43.7)	higher
Latino	28.8	(25.9-32.0)	higher
White	9.6	(8.5-10.8)	Reference

#### V.B.iii.1.e.ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

The Elevated Blood Lead Level (EBLL) map shows that the rate / thousand of EBLLs varies widely by neighborhood. The highest rates are in certain census tracts in East Boston, Allston, Roxbury, Dorchester, Mattapan and Hyde Park. These neighborhoods have large populations of Black and Hispanic/Latinos and smaller but significant populations of Asians.

The MEPHT's EBLL data does not provide breakouts of the data by racial/ethnic, national origin or family status groups. However, by sorting the data by census tracts with the lowest to the highest percentage of white, non-Hispanic population, you can see that most of the tracts

with higher rates / thousand of EBLs are in tracts with a high percentage of persons of color and Hispanics. Of the 74 tracts with a 50% or more persons of color, 52 tracts (70%) have an EBL rate that is statistically higher than the statewide average rate compared to 26 out of 65 tracts (40%) in tracts with a majority white, non-Hispanic population. Interestingly, of the 18 R/ECAP Census tracts, 11 R/ECAP tracts have a lower EBL rate and only 7 have a higher rate. See Table 1 in Appendix D: Locally-Provided Maps & Tables.

#### Asthma Data by Neighborhood

The neighborhoods with higher rates of asthma ER visits and hospitalizations are Mattapan, Dorchester (North & South), Roxbury, and the South End, all neighborhoods that have large Black and Hispanic/Latino populations.

#### Asthma Emergency Department Visits by Neighborhood, 2015

	AAR per 10,000 residents	95% Confidence Intervals	Compared to rest of Boston
Boston	101.2	(98.7-103.7)	Citywide Reference
Allston/Brighton	61.4	(55.8-67.7)	lower
BB,BH,WE,NE	42.5	(37.3-48.5)	lower
Charlestown	88.5	(75.5-103.8)	Similar
East Boston	44.1	(38.2-51.0)	lower
Fenway	60.4	(54.5-67.1)	lower
Hyde Park	103.7	(92.6-116.2)	Similar
Jamaica Plain	74.2	(65.7-83.8)	lower
Mattapan	173.8	(158.1-191.0)	higher
North Dorchester	170.3	(160.2-181.1)	higher
Roslindale	97.5	(86.7-109.7)	Similar
Roxbury	201	(188.2-214.8)	higher
South Boston	61.4	(53.8-70.0)	lower
South Dorchester	155.4	(146.4-164.9)	higher
South End	122.1	(111.4-133.9)	higher
West Roxbury	27.6	(22.0-34.6)	lower



## Asthma Hospitalizations by Neighborhood, 2015

	AAR per 10,000 residents	95% Confidence Intervals	Compared to rest of Boston
Boston	21.9	(20.8-23.1)	Citywide Reference
Allston/Brighton	14.2	(11.6-17.4)	lower
BB,BH,WE,NE	6.1	(4.3-8.7)	lower
Charlestown	12.3	(8-18.8)	lower
East Boston	20.7	(16.8-25.6)	Similar
Fenway	11.7	(9.3-14.9)	lower
Hyde Park	18	(13.7-23.7)	Similar
Jamaica Plain	17	(13.2-21.9)	Similar
Mattapan	31.1	(24.9-38.9)	higher
North Dorchester	34.1	(29.7-39.1)	higher
Roslindale	16.5	(12.4-21.9)	Similar
Roxbury	43.2	(37.5-49.8)	higher
South Boston	12.8	(9.6-17)	lower
South Dorchester	29.8	(26-34.6)	higher
South End	28.6	(23.7-34.6)	higher
West Roxbury	8	(5.2-12.2)	lower

## f. Patterns in Disparities in Access to Opportunity

### V.B.iii.1.f. Patterns in Disparities in Access to Opportunity

V.B.iii.1.f.i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

*For question (1)(f)(i), refer to the answers provided in question (1)(a)-(e).*

Disparities by race and ethnicity are evident across all of the opportunity categories discussed here. Blacks generally scored lowest on all of the opportunity indices, followed in ascending order by Hispanics, Asians and Whites. Geographically, neighborhoods with larger populations of Blacks and/or Hispanics generally had higher rates of exposure to poverty and environmental health issues such as Elevated Blood Lead levels and asthma. There is a strong overlap of lower scores on the opportunity indices with areas with higher levels of segregation and with the R/ECAPs, but the degree of overlap varies for each indicator. In particular, the Transit Index and the Transportation Cost Index did not necessarily track R/ECAP and segregation patterns. But, in general, neighborhoods such as Roxbury, Dorchester, Mattapan, and East Boston had the highest percentages of Black and/or Hispanic/Latinos and scored lowest on the opportunity indices.

Obviously, many of these opportunity categories are linked to each other. Environmental Health exposures can impact student school attendance and performance in school. Lead exposure causes negative cognitive, behavioral, and health effects such as lowered IQ, learning disabilities, shortened attention span, and even death.<sup>9</sup> These health effects can lead to decreases in academic performance along with lost lifetime earnings. A study of Massachusetts fourth graders born between 1992 and 1999 found that higher early childhood lead levels were associated with lower MCAS test scores for English Language Arts (ELA) and Math.<sup>10</sup> Conversely, larger decreases in lead levels among the same cohort were associated with larger improvements in MCAS scores. Negative cognitive effects are also linked to potential lifetime earning losses in the billions of dollars. A mean IQ loss of 1 point equals approximately a 1% loss of lifetime earnings, which includes effects on high school graduation rates.<sup>11</sup> This equals about \$7,000 dollars in lost lifetime earnings per child. Even a small amount of lead can harm a child's health and research has shown the change in a blood lead level from 0 to 1 is more harmful than the change from 4 to 5, 8 to 9, etc.<sup>12</sup>

<sup>9</sup>"Low Level Lead Exposure Harms Children: A Renewed Call for Primary Prevention", 2012

<sup>10</sup> Reyes, Jessica Wolpaw, "Lead Policy and Academic Performance: Insight from Massachusetts," Harvard Educational Review, Spring 2015, 75-124

<sup>11</sup> Reyes, "Harvard Educational Review", 2015

<sup>12</sup> Reyes, Jessica Wolpaw, "The Societal Burden of Lead," Speech, New England Lead Conference, New Hampshire, Portsmouth, November 5, 201

Educational failure whether due to poor student performance or underperforming schools can limit an individual's future educational options, ability to access quality employment options and ability to afford to live in low poverty/higher opportunity areas.

---

---

## g) Additional Information

### V.B.iii.2. Additional Information

V.B.iii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

*Understanding the limitations of the HUD-provided data discussed in the introduction to the instructions, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and family status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).*

The data provided by HUD focused primarily on discrimination based on race, color, national origin, familial status (families with children) and disability. Unfortunately, no data was provided on disparities in opportunity or discrimination based on religion. We are concerned that in the current political climate discrimination is likely against non-Christians, especially against Muslims and people whose national origin is a primarily Muslim country.

In addition to the Federal protected classes, Massachusetts Anti-discrimination Law, M.G.L. ch.151B, prohibits discrimination against the following protected classes: sexual orientation, marital status, age, veteran status or membership in the armed forces, receipt of Section 8 or other public assistance, or genetic information. We are scheduling additional engagement meetings with organizations serving the elderly and LGBTQ communities to obtain information on their housing experiences and issues. We've included information on Suffolk Law School's Housing Discrimination Testing Program's recent Gender Identity Discrimination study, citing a finding of significant discrimination. We also have gathered data explored elsewhere in this Assessment of fair Housing on obstacles experienced by Section 8 voucher holders.

V.B.iii.2.b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

*For question (2)(b), program participants may include any additional relevant information related to their analysis of disparities in access to opportunity in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as increasing access to opportunity.*

---

Housing a Changing City: Boston 2030 provides an analysis of barriers to affordable housing and outlines the City's strategy for increasing affordable housing production and preservation, including affordable housing for low-income persons, and housing for seniors and persons with disabilities. Here is a link to the report:

<https://www.boston.gov/departments/neighborhood-development/housing-changing-city-boston-2030>

The City recently issued **Go Boston 2030**, a detailed plan to address disparities in transportation access and affordability and improve convenient access to employment hubs for Boston's underserved neighborhoods. Here is a link to the report:

<https://www.boston.gov/transportation/go-boston-2030>

In March of 2016, Boston issued **Boston's Workforce: An Assessment of Labor Market Outcomes and Opportunities**. The report provides more in depth analysis of the barriers to employment opportunities in Boston. Here is a link to the report:

[https://owd.boston.gov/wp-content/uploads/2016/03/2015-Office-of-Workforce-Development-Workforce-Report-Booklet\\_v1\\_r8\\_spreads.pdf](https://owd.boston.gov/wp-content/uploads/2016/03/2015-Office-of-Workforce-Development-Workforce-Report-Booklet_v1_r8_spreads.pdf)

#### V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity

*For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with disparities in access to opportunity, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.*

Access to financial services

X The availability, type, frequency, and reliability of public transportation

Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods, including services or amenities

Lack of regional cooperation

Land use and zoning laws

Lending discrimination

Location of employers

X Location of environmental health hazards

X Location of proficient schools and school assignment policies

Location and type of affordable housing

Occupancy codes and restrictions

Private discrimination

---

## Disproportionate Housing Needs

### V.B.iv.1. Analysis

V.B.iv.1.a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

*For question (1)(a), refer to Tables 9 and 10. Table 9 shows the percentage of race/ethnicity groups and families with children experiencing two potential categories of housing need. The first category is households experiencing one of four housing problems: housing cost burden (defined as paying more than 30% of income for monthly housing costs including utilities), overcrowding, lacking a complete kitchen, or lacking plumbing. The second category is households experiencing "one of four severe housing problems" which are: severe housing cost burden (defined as paying more than half of one's income for monthly housing costs including utilities), overcrowding, and lacking a complete kitchen, or lacking plumbing. Table 10 shows the number of persons by race/ethnicity and family size experiencing severe housing cost burden.*

Table 9 shows that there are a total of 62,615 households in Boston with any of 4 severe housing problems, including incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room and cost burden greater than 50%. However, Table 10 shows that for 55,490 (89%) of those households their issue is severe housing cost burden, not one of the other housing problems. Similarly, of the 333,730 households in the metro area with severe housing problems, for 299,590 (89%) of them the issue is severe housing cost burden. We will therefore focus most of our analysis on severe housing cost burden data in Table 10.

In Boston, 22.3% of all households have a severe housing cost burden. For White headed households, the percentage is slightly lower (19.3%) while it is higher for Blacks (26.8%), Hispanics (25.7%) and Asians (26.3%). This is consistent with the higher average household incomes for Whites than for other racial and ethnic groups. The percentage of Whites and Asians with severe housing burden is lower in the metro region (15.3% and 17.9%, respectively) compared to Boston. For Blacks and Hispanics the percentage is about the same in the metro area as in the City.

According to HUD's data, in Boston 62% of the households with severe housing burden are non-family households. Only 4% are large family households with 5 or more people and the remainder 34% are small family households with 4 or fewer people. In the metro region only 51% of the households with severe cost burden are non-family households, 6% are large family households and 43% are small family households.

V.B.iv.1.b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

---

*For question (1)(b), refer to Map 6. Map 6-A shows the residential living patterns for persons by race/ethnicity, overlaid by shading indicating the percentage of households experiencing one or more housing problems. Darker shading indicates a higher prevalence of such problems. The map also includes R/ECAP outlines. Map 6-B shows the same information overlaid on residential living patterns by national origin.*

Map 6-A shows that the highest percentages of households experiencing housing burdens are in Dorchester, Roxbury, Mattapan, East Boston, parts of Hyde Park and Allston. Since most of the housing problems are related to rent burden rather than other housing problems, the highest percentages of households with housing problems largely tracks the relative levels of incomes in the neighborhoods, with higher percentages of housing problems in lower-income neighborhoods. Some of the R/ECAPs show the highest percentages of households with housing burdens while others show more moderate levels, probably reflecting the relative proportion of the Census tracts' households who are already living in subsidized housing. Parts of Dorchester, Roxbury and Mattapan are relatively segregated, primarily Black neighborhoods. East Boston and Hyde Park are less segregated but have large populations of Hispanic/Latinos. Predominantly white neighborhoods such as South Boston and West Roxbury have relatively lower percentages of households with housing problems

Map 6-B shows Chinese residents clustered in two tracts in Chinatown that have high or very high percentages of housing-burdened households. Haitians have a distributed across several neighborhoods in Dorchester and Mattapan, some with high levels of housing problems and others with lower levels. Vietnamese show a clustering of households in several areas of Dorchester with relatively high percentages of housing burdened households. Dominicans are spread more widely across the city, across a wide range of tracts with varying levels of housing problems.

**V.B.iv.1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.**

*For question (1)(c), refer to Tables 9 and 11. Table 9 shows housing needs experienced by families with 5 or more persons (used to approximate the population of families with children). Table 11 shows the number of households occupying units of various sizes (0-1 bedrooms, 2 bedrooms, 3 or more bedrooms) in four publicly supported housing program categories (public housing, Project-based Section 8, Other HUD Multifamily, and HCV). Table 11 shows the number of households with children currently residing in each of those four program categories.*

Table 9 shows that only 7,955 (7.2%) out of the 111,255 households in Boston with one of the 4 housing problems are large family households (5+ persons). 39,955 (36%) are small family households and 63,350 (57%) are non-family households. At the metro region level, 44% are non-family households, 9% are large family households and the remaining 47% are small family households.

It is difficult to analyze how the housing units in Table 11 would or would not address the housing needs experienced by the approximately 8,000 Boston families with children (5+ persons) in Table 9. Some of these 8,000 families may already have a Housing Choice Voucher and be counted among the 6,590 families in the Housing Choice Voucher Program in households with 3+ bedroom units in Table 11. In hot market areas like Boston, voucher holders may still be rent burdened, paying 31% - 40% of their income for housing even with a voucher. On the other hand, without income information, we do not really know how many of those 8,000 large family households with housing problems would even meet the income limits for one of the 4 housing programs in Table 11. As we know from the comparison of Table 9 with Table 10, severe housing cost burden is the most significant of the 4 housing problems, not overcrowding, or lack of kitchen or bathroom facilities.

Looking more closely at Table 11, we see that Public Housing and Project-Based Section 8 developments have about the same proportion of 0-1 bedroom units (50%), 2 bedroom units (28% - 29%) and 3+ bedroom units (20% - 22%). Other Multi-family developments are mostly 0-1 bedroom units. This is probably because a very large number of these units in Boston are Section 202 units for the elderly. Housing Choice Vouchers serve a much larger proportion (46%) of households in 3+ bedroom units compared with Public Housing or Project-based Section 8 developments.

V.B.iv.1.d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

*For question (1)(d), local data and local knowledge may be particularly useful in answering this question.*



The table below shows the % of households that are homeowners by race/ethnicity compared with their proportion of total households. In both Boston and in the metro region, White are overrepresented in the percentage of homeowner households compared with their percentage of total households. Blacks, Hispanics and Asians are underrepresented.

City of Boston					
	Owners	Renters	Total HHs	% of HHs	% of Owners
White	57,120	76,130	133,250	53.4%	67.1%
Black	15,145	36,435	51,580	20.7%	17.8%
Hispanic	5,760	30,195	35,955	14.4%	6.8%
Asian	5,285	15,805	21,090	8.5%	6.2%
Total	85,140	164,275	249,415	100.0%	100.0%
Boston-Cambridge-Newton, MA-NH Region					
	Owners	Renters	Total HHs	% of HHs	% of Owners
White	954,555	433,470	1,388,025	79.1%	88.0%
Black	36,800	72,990	109,790	6.3%	3.4%
Hispanic	32,590	94,345	126,935	7.2%	3.0%
Asian	48,455	50,940	99,395	5.7%	4.5%
Total	1,085,050	670,610	1,755,660	100.0%	100.0%

Some of this over representation of Whites and underrepresentation of other races/ethnicities is probably due to the higher incomes of Whites. However, a recent study of mortgage lending<sup>13</sup> in Boston and the metro area shows that even when income is controlled for, significant differences in mortgage lending by race and ethnicity remain.

#### V.B.iv.2. Additional Information

<sup>13</sup> Changing Patterns XXIII: Mortgage Lending to Traditionally Underserved Borrowers & Neighborhoods in Boston, Greater Boston and Massachusetts, 2015

---

V.B.iv.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

*For question (2)(b), program participants may include any additional relevant information related to their analysis of disproportionate housing needs in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs.*

Boston has over 30,000 units of privately-owned subsidized housing. Many of these unit are at risk due to expiring use restrictions, termination of rent subsidies or strong market conditions incentivizing owners to convert properties to market-rate housing. Currently, we estimate that over 10% of these units are at elevated risk for conversion to market-rate housing over the next 10 years. Many of these units are located in high opportunity areas and could not be replaced in their current market areas. Despite the need for new housing, the city and its partners must dedicate a significant amount of the available resources to preserving these existing affordable housing units.

Gentrification is another issue having a significant and disparate impact in several of Boston's neighborhoods, including Chinatown, East Boston, and parts of Dorchester and Roxbury. Market pressures are creating opportunities for landlords of unsubsidized low rent properties to sell their properties or empty out the buildings, renovate them and either rent them to a higher income group or convert the properties to condominiums. The city and its partners have adopted a multi-pronged approach to mitigating the impact of gentrification. Strategies include working with tenants and non-profits to acquire existing unsubsidized rental properties in order to convert them to permanent affordable housing, expanding homebuyer assistance programs to enable renters in impacted areas to buy homes in the neighborhood. Another strategy is to slow the market in these areas by increasing the total supply of housing, including the number of affordable units. The City is also seeking legislation to regulate evictions, provide tax incentives to landlords to keep rents affordable and provide tenants with a right to counsel in eviction cases.

We received comments from many organizations and individuals regarding the income levels used by the City in its housing programs. Advocates and residents have argued that the metro area-based income limits are higher than the actual median income for the City of Boston and its neighborhoods, resulting in rents that are too high for existing neighborhood residents. Further, while recognizing that low-income is not a protected class, some advocates have argued that targeting some resources such as Inclusionary Development Program funds to middle-income households is likely to have a disparate impact on protected classes because Blacks, Hispanics, Asians are disproportionately lower-income. The City's position is that given Boston's extremely hot real estate market it is necessary to provide assistance to a wider income range of priced out renters and homebuyers. Also, given the disparity in homeownership rates between Whites and other racial and ethnic groups, we feel that it is

---

important to continue to allocate funds to support the development and purchase of homeownership housing. Our track record thus far indicates that providing assistance for homeownership and a wider range of incomes has not had a disparate impact and has in fact affirmatively furthered fair housing. The homebuyers and renters served by our programs are disproportionately persons of color. Nonetheless, we will take steps to deepen the income targeting in the housing we assist by working with developers seeking assistance from the City to increase the number of units targeted to households at or below 50% of the area median income. This will likely require deeper capital subsidies, resulting in fewer affordable units being built overall. We will continue to explore and engage with the community and advocates on this important.

**V.B.iv.2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.**

*Understanding the limitations of the HUD-provided data discussed in the introduction to the instruction, using local data and knowledge, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and family status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include any relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).*

We welcome comments and suggestions regarding additional information or issues relevant to the assessment of disproportionate needs.

#### **V.B.iv.3. Contributing Factors of Disproportionate Housing Needs**

*For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with disproportionate housing needs, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.*

- X The availability of affordable units in a range of sizes
- X Displacement of residents due to economic pressures
  - Lack of private investments in specific neighborhoods
  - Lack of public investments in specific neighborhoods, including services or amenities
  - Land use and zoning laws
- X Lending Discrimination

## Publicly Supported Housing Analysis

### V.C.1. Analysis

#### V.C.1.a. Publicly Supported Housing Demographics

**V.C.1.a.i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?**

*For questions (1)(a)(i) and (ii), refer to Tables 6 and 7. Tables 6 and 7 present data by race/ethnicity for persons occupying four categories of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in the jurisdiction. The tables also provide race/ethnicity data for the total population in the jurisdiction and for persons meeting the income eligibility requirements for a relevant category of publicly supported housing. Relevant information may also include housing converted through RAD, which may be analyzed as part of either project-based Section 8 or project-based vouchers.*

As shown in Table 6, Whites compose almost one fifth (19.7%) of all residents of public housing, compared to 35.1% comprised by Blacks, and 36.7% by Hispanics; Asians represent the smallest proportion of public housing residents at 8.3%. The latter is different than Project Based Sect 8, where Whites compose 26.4% of all residents, compared to 32.6% Black composition and 28.3% Hispanic composition, and 12.3% Asian and Pacific Island composition.

The racial/ethnic composition of Other Multi-Family family; more than a third (36.5%) of all residents are White, followed by Blacks who compose 31.4% of the resident population; Hispanics compose 17.2%, and Asian Pacific persons who compose 14.3% of all residents.

Black residents are the majority (51%) of the participants in the Housing Choice Voucher Program, followed by Hispanics at 27%. White households compose 17.4% of the HCV Program, while Asian Pacific represents a relatively low rate at 4.1%.

	White (%)	Black (%)	Hispanic (%)	Asian (%)	Total (%)
Public Housing	19.7	35.1	36.7	8.3	<b>99.76</b>
Project-Based Sect. 8	26.4	32.6	28.3	12.3	<b>99.55</b>
Other Multi-Fam	36.6	31.4	17.2	14.3	<b>99.41</b>
HCV Program	17.4	51.03	27.07	4.1	<b>99.6</b>

Source: Table 6

Based on a review and analysis of the raw data provided by HUD, the percentage of minority residents in publicly supported housing varied by type of housing. In the Boston jurisdiction,

most public housing sites are 50% minority or greater; 28 public housing sites are located within R/ECAPs. In the region, there is greater dispersion of public housing sites, and several adjacent ones have varying rates in the percentage of minority residents.

For Project-based Section 8 housing in the Boston jurisdiction, most (41) are located in the neighborhoods of Roxbury, Dorchester and the South End. Except for a few, the latter sites show percentage of minority residents at 50% or higher. In the region, there is greater dispersion of the location of Project Based Section 8, and in some cities, lower percentage of minority residents (Revere; Melrose; Medford; Somerville; Quincy; Arlington, and others). Interestingly, in Cambridge – a city regarded highly for the quality of education – the percentage of minority residents is 50% or more for most of its Project Based Section 8 housing.

For Other Multi-Family Housing in the Boston jurisdiction, the sites with higher percentage of minority residents are located in Dorchester; Mattapan; Roxbury; Chinatown; and Hyde Park - sites with lower percentage of minority residents are found in other neighborhoods. In the region, there are relatively few housing sites with relatively high percentages of minority residents. In most cities, this housing type registers a percentage of minority residents of 25% or less. The exception to these places include Lynn; Andover; Needham; Topsfield; Salem; and Brockton; in these places there may be Other Multi-Family housing with a minority percentage of 50% or more, but in these same cities some similar housing show percentages of 25% or less.

The demography of Housing Choice Vouchers (HCV) shows that in the Boston jurisdiction, there are HCVs (by tracts) that reflect a higher proportion of Asian residents. In some tracts in Dorchester and Chinatown, there are HCV units reporting between 10% and 50% of its holders as Asian PI. Not surprisingly, there is one tract in Chinatown where up to 74% of HCV residents are Asian PI. Except for one tract in Chinatown, these tracts are not located in R/ECAPs.

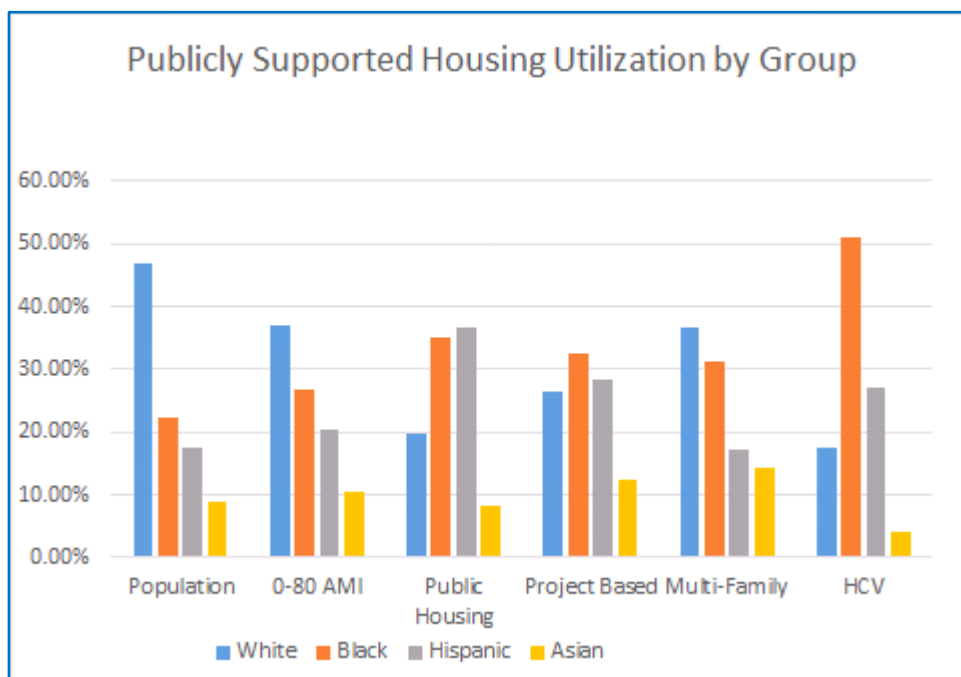
The distribution of HCV shows a concentration of Hispanics in some Boston jurisdiction locations. Parts of Roslindale, Jamaica Plain show that Hispanics comprise between 50% and 97% of HCVs. Parts of West Roxbury, Hyde Park, Roxbury and the South End show that Hispanics comprise 30% and 50% of HCVs. There are 11 R/ECAPs where 30% to 97% of the HCV tracts are reported as Hispanic.

There is considerable concentration of Black HCV participants in parts of Hyde Park, Mattapan, Dorchester, Roxbury and the South End. In these places the HCV data shows Black participation levels between 50% and 82%. There are 15 R/ECAPs where between 30% and 82% of the level of HCV participation in the census tract are reported as Black.

There are some local tracts that stand out because of the percentage of HCV units occupied by disabled households is between 50% and 100%. These include parts of Brighton, Allston, Back Bay, Bay Village, South Boston, South End, Charlestown, East Boston, Dorchester and

the West End. Except for a tract in East Boston and Dorchester, the former are not located in R/ECAPs.

Generally, blacks and Hispanics are disproportionately represented in public housing. Blacks, Hispanics and Asians are disproportionately represented in Project- Based Section 8 units, Blacks and Asians are disproportionately represented in Other Multi-Family housing and Blacks are exceedingly disproportionately represented in HCV units while Hispanics are marginally disproportionately present.



V.C.1.a.ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

*For questions (1)(a)(i) and (ii), refer to Tables 6 and 7. Tables 6 and 7 present data by race/ethnicity for persons occupying four categories of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in the jurisdiction. The tables also provide race/ethnicity data for the total population in the jurisdiction and for persons meeting the income eligibility requirements for a relevant category of publicly supported housing. Relevant information may also include housing converted through RAD, which may be analyzed as part of either project-based Section 8 or project-based vouchers.*

There are 272,481 housing units in the Boston Jurisdiction, 58,550 or 21.5% include public housing, Project-based Section 8, Other Multifamily, and HCV Program.

	<b>(Boston, MA CDBG, HOME, ESG) Jurisdiction</b>	
Housing Units	Number	Percentage
Total housing units	272,481	-
Public Housing	10,251	3.76%
Project-based Section 8	29,938	10.99%
Other Multi Family	2,481	0.91%
HCV Program	15,880	5.83%

Source: Table 5 - Publicly Supported Housing Units by Program Category; Decennial Census; APSH

White household comprise the largest proportion in Boston at 55.4%; Blacks comprise slightly over a fifth (21.3%) of all households and Hispanics, 14.3%; the following is from the raw data (Version 1) of AFFH Tables for Boston jurisdiction.

Household	Number	Percentage
White	134,305	55.4%
Black	51,705	21.3%
American Indian	442	0.2%
Hispanic	34,730	14.3%
Asian Pl	21,065	8.7%

In the Boston CBSA region, in 2010, White households represented the largest segment of the population in the CBSA at 75.8%, followed by Hispanic households at 9.1%, Blacks at 7.5%, and Asian Pacific Islanders at 7.2%.

Household	Number	Percentage
Whites	3,408,585	75.8%
Blacks	337,751	7.5%
Native Americans	16,406	0.4%
Asians PI	323,622	7.2%
Hispanics	410,516	9.1%

The table below shows the correlation values between the proportion of tenants by race/ethnicity and the racial/ethnic proportion of the tract's population. The correlation values are organized by the type of public supported housing. The table suggests that the higher the proportion of Whites in public housing, the greater likelihood (.807) that they are in tracts with higher proportions of Whites. This is also the case for Asians (.757), and to a lesser degree for Hispanics, and then Blacks. For Project Based Section 8 and Other Multi-Family, the strongest correlation pertains to Asians: the higher proportion of Asians in Project Based Section 8, the greater likelihood that they are found in tracts with a higher proportion of Asian residents (.803); this is the case, similarly for Asians, for Other Multi-Family (.814).

Correlation Between Prop Race (%) and Tract Race (%)	Public Housing	Project Based Section 8	Other Multi-Family	LIHTC
Property Black (%)	0.588	0.582	0.878	NA
Property Hispanic (%)	0.676	0.412	0.443	NA
Property Asian (%)	0.757	0.803	0.814	NA
Property White (%)	0.807	0.547	0.674	NA

Source: *AFFHT\_MapQuery\_ddf372f0-3809-11e7-b7d0-005056be057a*, accessed via <https://egis.hud.gov/affht/#>, Map 5, AFFHT 0001, 6/30/2016.



### V.C.1.b. Publicly Supported Housing Location and Occupancy

V.C.1.b.i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

*For questions (1)(b)(i) and (ii) refer to Maps 5 and 6, which are race/ethnicity dot density maps with a publicly supported housing overlay, including outlines of R/ECAPS. In Map 5, symbols representing four categories of publicly supported housing indicate the location of a development of that category of housing. Note that some developments may represent multiple buildings or projects that are not necessarily located at the same address the symbol represents. In Map 6, the density of use of Section 8 vouchers is layered over a race/ethnicity dot density map. Darker shading represents a heavier concentration of vouchers. Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations are often affected differently by laws, policies and practices, resulting in significantly different siting patterns. Local knowledge may be particularly useful in answering this portion of the question.*

There were 23 R/ECAPs in Boston jurisdiction in 1990, 24 in 2000, and 24 in 2010.

In 1990, 28 public housing sites were inside or intersecting R/ECAP boundaries for that year; in 2000 this number increased to 28 public housing sites inside R/ECAP boundaries; and in 2010 there were 31 public housing sites within or intersection R/ECAP boundaries.

While there are some public housing sites that have been found in R/ECAPs between 1990 and 2010, there are also a considerable number that are located outside such areas. In the earlier period, the R/ECAPs were primarily located in Black and Hispanic parts of the City, but not exclusively. In other words, there were parts of the City (parts of Mattapan; Hyde Park; Roxbury; Dorchester; East Boston; South End) where a Black and Hispanic presence was prominent, but in areas not designated as R/ECAPs.

By 2010, R/ECAPs are found in areas of the City with predominantly Black and Hispanic residents, but again, many areas with growing numbers and proportion of Black and Hispanic residents are not in R/ECAP areas.

#### **Public Housing:**

- In the Boston jurisdiction, not a clear pattern in terms of R/ECAPs
- In the region there are 15 R/ECAPs; based on a visual review of Map 5, there does not seem to be a clear pattern in terms of the location of public housing and R/ECAPs

**Other Multi-family:**

- In the Boston jurisdiction, 14 Other Multi-Family sites are in R/ECAPs, and the remainder outside
- In the region, most of this type of housing are outside R/ECAPs.

**Project Based Section 8:**

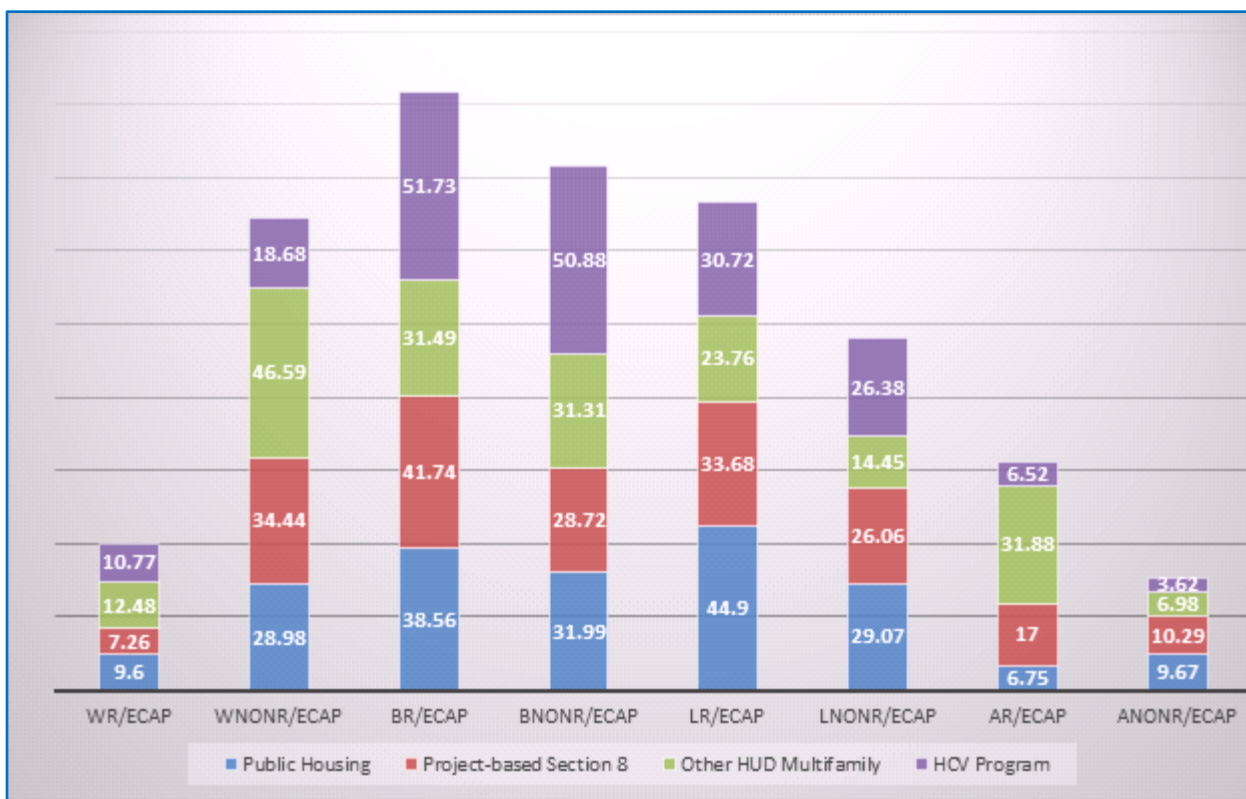
- In the Boston jurisdiction, a high proportion - but not all- are located in, and adjacent to R/ECAPs
- In the region, most are outside R/ECAPs.

**Low-income Tax Credits:**

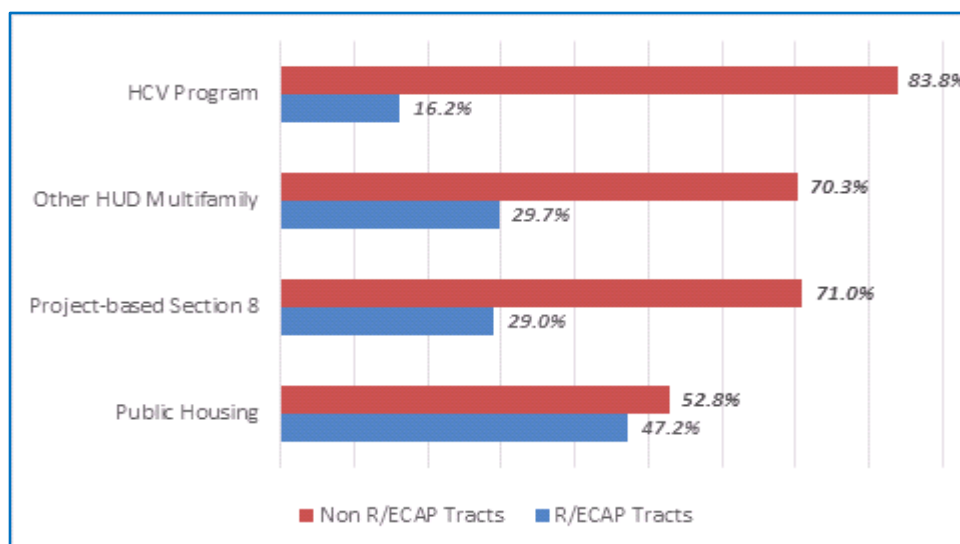
- In the Boston jurisdiction, most are located in the R/ECAPs
- In the region, most are outside R/ECAPs.

	Whites in R/ECAP	Whites in non- R/ECAP	Blacks in R/ECAP	Blacks in non- R/ECAP	Hispanics in R/ECAP	Hispanics in non- R/ECAP	Asians in R/ECAP	Asians in non- R/ECAP
Public Housing	9.6	29.0	38.6	32.0	44.9	29.1	6.8	9.7
Project -based Section 8	7.3	34.4	41.7	28.7	33.7	26.1	17.0	10.3
Other HUD Multi- family	12.5	46.6	31.5	31.3	23.8	14.5	31.9	7.0
HCV Program	10.8	18.7	51.7	50.9	30.7	26.4	6.5	3.6

Source: Table 7



The next chart shows the location breakdown of public housing programs by R/ECAP tracts and non-R/ECAP tracts. HUD reported 9,598 public housing units by R/ECAPs in Boston. Slightly more than half (52.8%) of these units were located in non R/ECAP tracts, and 47.2% in R/ECAP tracts. This is a different spread than is the case for Project-based Section 8 (28,222), where 71% were located in Non R/ECAP tracts, and 29% in R/ECAP tracts. The latter is similar to Other HUD Multi-Family (2,059), where 70.3% are located in non R/ECAP tracts, and 29.7% in R/ECAP tracts. The HCV Program (115,742) shows that 83.8% are in non R/ECAP tracts and 16.2% in R/ECAP tracts.



The pattern in the geographic location of publicly supported housing by program category has roughly mirrored the segregated areas and R/ECAPs for Boston. Boston's publicly supported housing is concentrated in more segregated areas and R/ECAPs. As of 2010, the cost burden and geographic location of various publicly supported housing varies by neighborhood with the greatest concentration of rental cost burdened households in the Fenway/Kenmore area and parts of Roxbury, Jamaica Plain, Dorchester and Hyde Park where more than 70% of renters were cost burdened in 2010. Because Boston has a substantial inventory of affordable and subsidized housing, there are low rates of cost-burdened households in areas with the lowest household incomes (<http://www.bostonindicators.org/indicators/housing/7-2housing-affordable-to-all-residents/7-2-4costburden>).

The total public supported housing units by program category are as follows for the Boston:

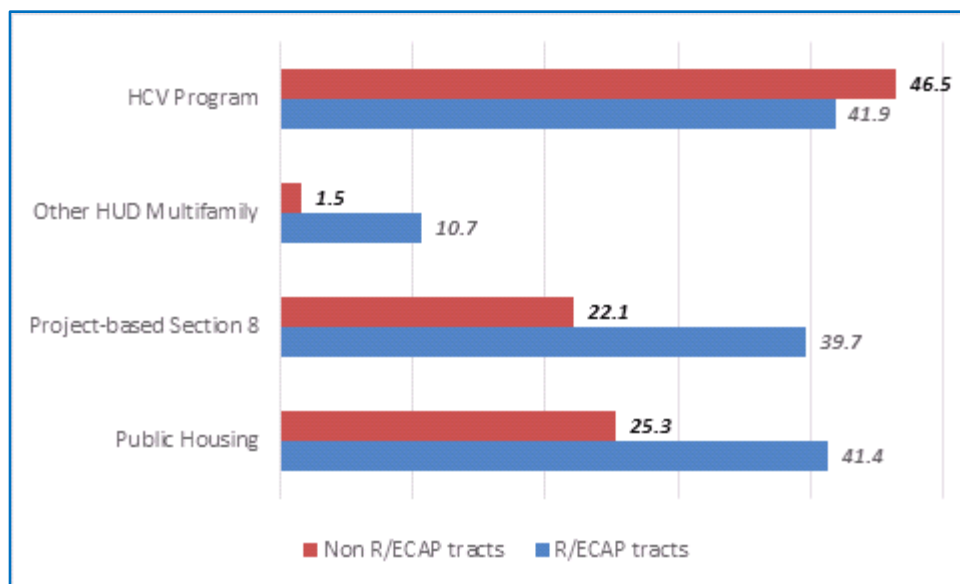
- Project-based Section 8 comprises 10.99% of the total housing units for publicly supported housing units by program category.
- The HCV Program comprises 5.83% of the total housing units.
- Public Housing comprises 3.76% of the total housing units.
- "Non-Public Housing" comprises 78.51% of the total housing units for publicly supported housing units by program category.

**V.C.1.b.ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?**

*For questions (1)(b)(i) and (ii) refer to Maps 5 and 6, which are race/ethnicity dot density maps with a publicly supported housing overlay, including outlines of R/ECAPS. In Map 5, symbols representing four categories of publicly supported housing indicate the location of a development of that category of housing. Note that some developments may represent multiple buildings or projects that are not necessarily located at the same address the symbol represents. In Map 6, the density of use of Section 8 vouchers is layered over a race/ethnicity dot density map. Darker shading represents a heavier concentration of vouchers. Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations are often affected differently by laws, policies and practices, resulting in significantly different siting patterns. Local knowledge may be particularly useful in answering this portion of the question.*

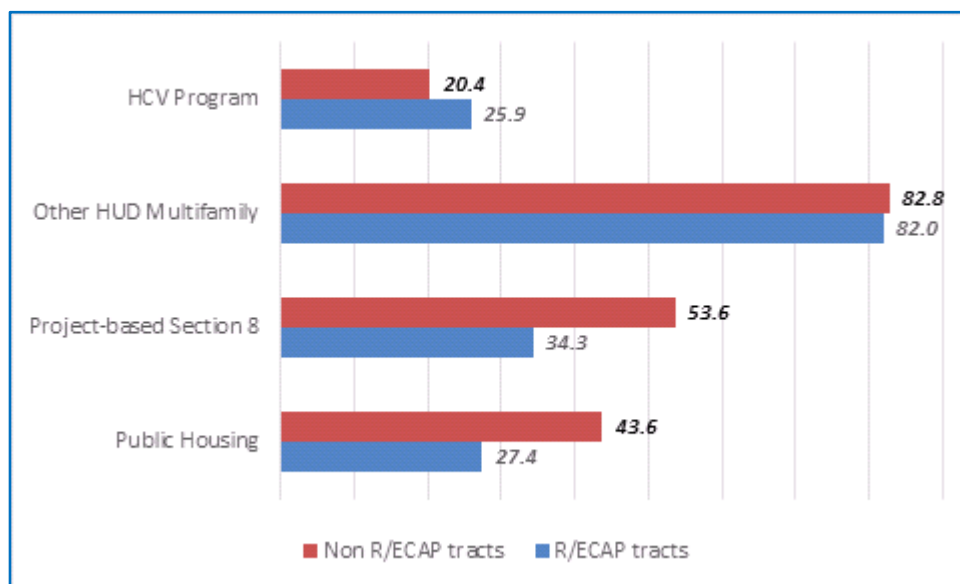
**Children:** Within the "Boston, MA CDBG, HOME, ESG Jurisdiction)", children under the age of 18 comprise 16.79% of the total population contained in HUD's data set. According to the 2000 census, 24.1% of the general population of Boston is under the age of 19. (<http://www.bumc.bu.edu/inspir/files/HTML/Boston%20Population%20and%20Demographics.htm>).

Forty-one percent (41.4%) of families with children living in public housing are found in R/ECAP areas; this is similar for families with children participating in HCV Program, at 41.9%. Approximately 39.7% of families with children living in Project-based Section 8 reside in R/ECAP areas; the rate for families with children in Other HUD Multifamily is 10.7%.



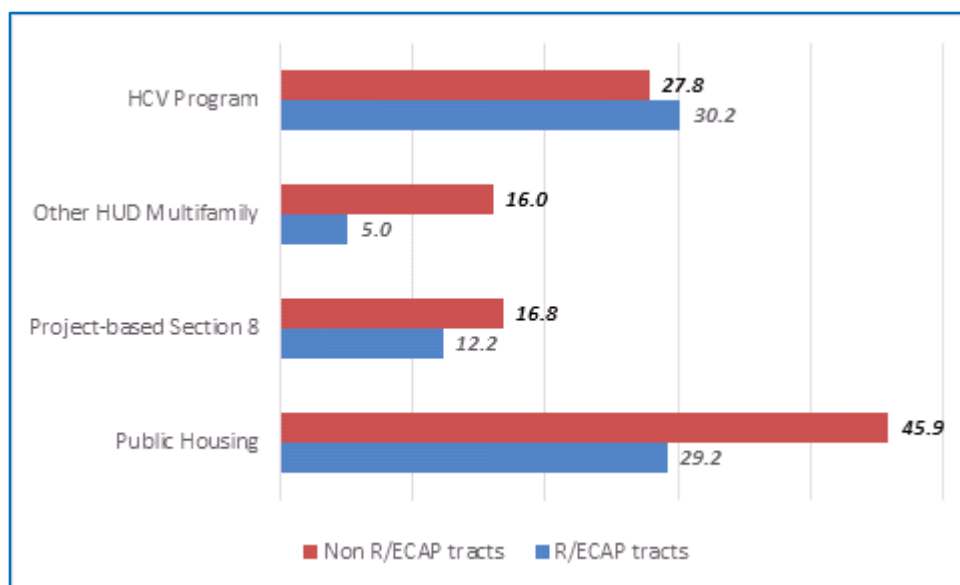
Source: Table 7

The elderly population is more evenly spread between R/ECAP and non R/ECAP areas, and not as concentrated in R/ECAP areas by public housing, Project-based Section 8, and Other HUD Multifamily. In the latter three housing types, elderly residents tend to reside more in non R/ECAP tracts versus R/ECAP tracts. Only in the HCV Program do a higher proportion of elderly residents live in R/ECAP areas.

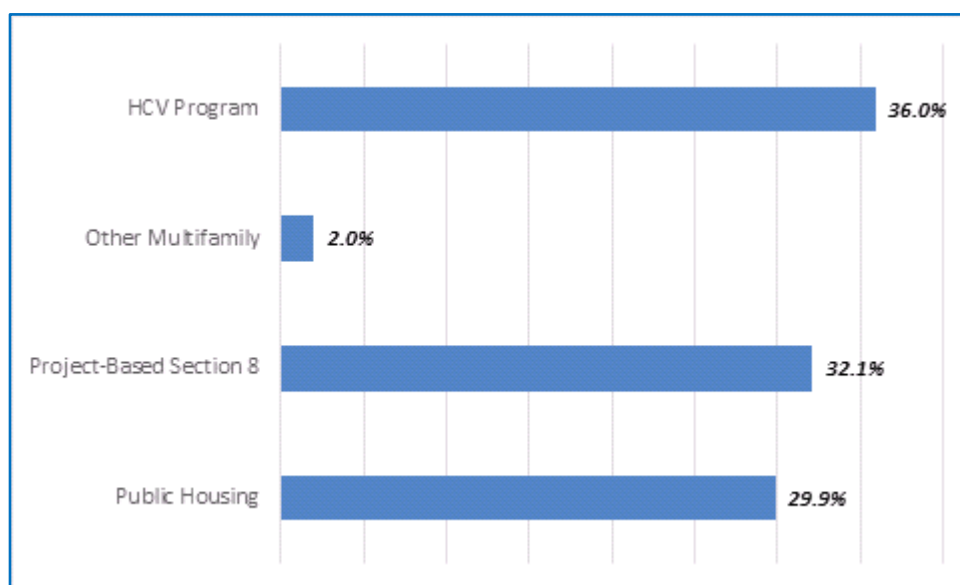


Residents with a disability residing in public housing have a greater chance (45.9%) of living in non-R/ECAP areas than in R/ECAP areas (29.2%). There is also a greater chance of residents with a disability living in non-R/ECAP areas if they are Project-based Section 8

participants, or reside in Other Multi-Family housing. Only in the HCV Program is there a slightly greater tendency (30.2%) for residents with a disability to live in a R/ECAP, versus a non-R/ECAP (27.8%).



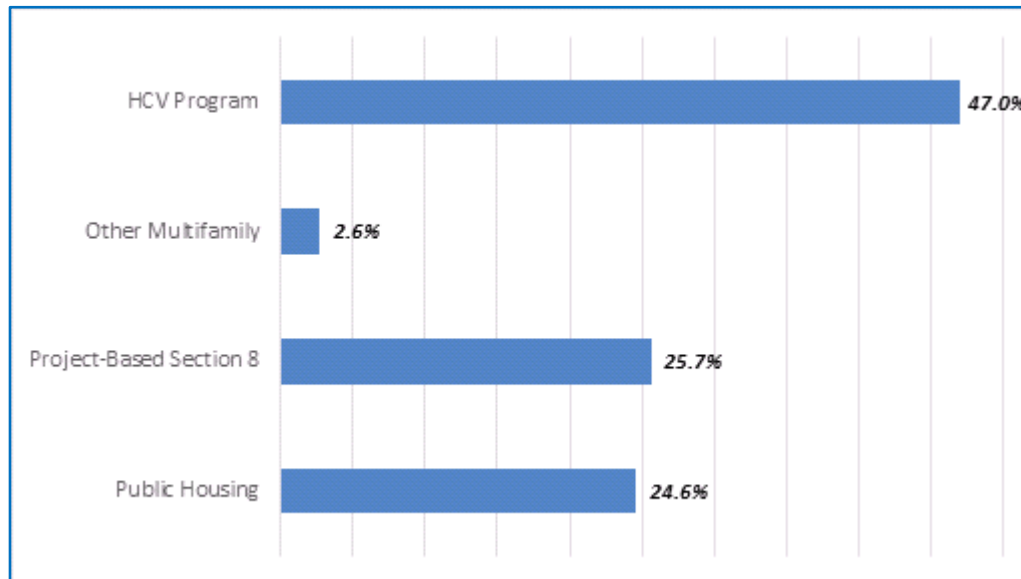
Based on a count of 11,200 persons with a disability in publicly supported housing, 36% are participants in the HCV Program; 32% in the Project-Based Section 8; 29.9% reside in public housing. Only 2% of all residents with a disability live in Other Multi-Family in Boston.



Source: Table 15

In the region, 31,869 residents with disability were counted as living in publicly supported housing; close to half (47%) of all residents with a disability are participants in the HCV Program; a quarter (25.7%) are participants in Project-Based Section 8, and a similar

proportion (24.6%) reside in Public Housing. As is the case with Boston, a relatively small proportion (2.6%) of residents with disabilities are live in Other Multifamily housing.



Within the Boston, children under the age of 18 make up 21.60% of the total population contained in HUD's data set.

**Elderly persons:** Within the Boston, elderly persons compose 10.08% of the total population contained in HUD's data set. This is in-line with the 10.41% of the population aged over 65 in the greater population of Boston.

(<http://www.bumc.bu.edu/inspir/files/HTML/Boston%20Population%20and%20Demographics.htm>). Within the region elderly persons compose 13.09% of the total population contained in HUD's data set.

**Persons with disabilities:** Within the Boston, persons with hearing difficulty make up 2.70% of the total population, persons with vision difficulty 2.49%, persons with cognitive difficulty 5.29%, persons with ambulatory difficulty 6.57%, self-care difficulty 2.29%, and independent living difficulty 4.52%. According to the Massachusetts Rehabilitation Commission, 11.6% of people self-identify as having a disability from the following categories: cognitive, ambulatory, independent living, hearing, self-care, and vision. (<http://www.mass.gov/eohhs/docs/mrc/mrc-disability-fact-sheet-2016.pdf>).

Within the region persons with hearing difficulty compose 3.06% of the total population, people with vision difficulty 1.81%, cognitive difficulty 4.27%, ambulatory difficulty 5.40%, self-care difficulty 2.07%, and independent living difficulty 3.93%.

---

**V.C.1.b.iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS?**

*For question (1)(b)(iii), use Table 7, which shows the percentage of occupants in four publicly supported housing program categories (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in units located either within R/ECAPs or outside of R/ECAPs. The table also breaks out this information by race/ethnicity, elderly and disability status. To answer the question, compare the percentage of occupants sharing a protected characteristic living in units located in R/ECAPS to the percentage of occupants sharing the same protected characteristic living in units outside of R/ECAPS. Relevant information may also include housing converted through RAD, which may be analyzed as part of Housing Choice Vouchers.*

In terms of the racial and ethnic composition of Public Housing in R/ECAP tracts, 38.6% of the occupied housing units are occupied by Blacks and 45% by Hispanics. Approximately 9.7% of all persons in public housing in R/ECAP tracts are White, and 6.8% are Asian. This is a different picture from public housing in non R/ECAP tracts where the racial and ethnic composition is 29% White, 32% Black, 29.1% Hispanic, and 9.7% Asian.

There are racial and ethnic differences in the occupancy of Project Based Section 8 units based on R/ECAP tracts compared to non R/ECAP tracts: 7.3% are White, 42% are Black; 34% are Hispanic and 17% are Asian. Project Based Section 8 housing units in non R/ECAP tracts are composed by 35% White, 29% Black, 26% Hispanic and 10.3% Asian.

Housing units in Other Multi-Family shows that 47% of all units in non R/ECAP tracts are White; 31.3% are Black; 14.5% are Hispanic and 7% are Asian. In the R/ECAP tracts, 12.5% of the occupied housing units are White; 31.5% are Black; 24% are Hispanic, but 32% are Asian.

A majority of households under the HCV Program are Black (52%) and Hispanic (31.1%); 6.6% of all the occupied housing units are Asian Pacific and 10.8% are White.

Within Boston R/ECAPs, blacks, non-Hispanic make up the largest identifiable racial ethnic group composing 36.09% of the total population of the people within HUD publicly supported housing, followed by 29.4% white, 18.99% white, non-Hispanic, 11.99% Asian or pacific islander, non-Hispanic, with 0.99% as "other, non-Hispanic" and native American, non-Hispanic composing 0.31%.

This is in contrast to the demographics of the region where white, non-Hispanic make up the greatest percentage of the population at 47.01%, followed by 22.36% black, non-Hispanic, 17.47% Hispanic, 8.91% Asian or pacific islander, non-Hispanic, 0.20% native American, non-Hispanic, and 1.63% other, non-Hispanic.

Within the region R/ECAPs, Hispanics make up the largest identifiable racial ethnic group composing 40.79% of the total population of HUD publicly supported housing, followed by

---



25.44% black, non-Hispanic, 20.47% white, non-Hispanic, 8.86% Asian or pacific islander, non-Hispanic, with 1.92% as “other, non-Hispanic” and native American, non-Hispanic composing 0.27%.

This is in contrast to the demographics of the region where white, non-Hispanic make up the greatest percentage of the population with 74.87%, followed by 6.62% black, non-Hispanic, 9.02% Hispanic, 6.45% Asian or pacific islander, non-Hispanic, 0.14% native American, non-Hispanic, and 1.03% other, non-Hispanic.

There were 65,929 persons living within R/ECAPs in Boston; 18.9% of this number are Whites; 36% are Blacks; 29.4% are Hispanic; 12% are Asian. There were 13,651 families living within the R/ECAP boundaries, and more than half (55%) of this number were families with children.

In the region, there were 116,156 persons living within R/ECAPs. The table shows a similar proportion of Whites (20.5%) as the case for Boston where Whites comprise 19% of all persons who live within R/ECAPs. There is, however, a drop in the Black portion to 25.4% and a significant increase in the Hispanic proportion to 41%. The Asian proportion of R/ECAP populations also declined from 12% to 8.9%.

It is more difficult to analyze the distribution of families with children (2000) in relation to publicly supported housing and R/ECAPs. Some areas show a concentration in some R/ECAPs in Boston, but not in others. R/ECAPs in South Boston, East Boston, Charlestown, and Roxbury show some concentration, but other places of the city that are relatively higher in terms of opportunity indices also show such concentrations. In terms of the region, some cities do stand out in the proportion of families with children and location of publicly supported housing types; some of these include: Lynn; Everett; Malden; Lowell; Lawrence; Dracut; Billerica; Andover; Beverly; and, Chelsea.

There are some concentrations in, and near, R/ECAPs and publicly supported housing in the number of LEP persons for the year 2010. In the Boston jurisdiction, East Boston, South Boston, South End, Roxbury and Chinatown seem to stand out in terms of the concentration of LEP persons in some R/ECAPs compared to adjacent areas. In terms of the region, there are some places with concentrations of LEP persons and proximity to publicly supported housing, in R/ECAPs; some of these include Chelsea; Somerville; Malden; Waltham; Revere; Lynn; Peabody; Lawrence; Haverhill; Peabody; Salem; Quincy; Brockton; Framingham; Marlboro and others.

	(Boston, MA CDBG, HOME, ESG) Jurisdiction		(Boston-Cambridge-Newton, MA-NH) Region	
R/ECAP Race/Ethnicity	Number	Percentage	Number	Percentage
Total Population in R/ECAPs	65,929	-	116,156	-
White, Non- Hispanic	12,522	18.99%	23,780	20.47%
Black, Non- Hispanic	23,791	36.09%	29,547	25.44%
Hispanic	19,386	29.40%	47,375	40.79%
Asian or Pacific Islander, Non- Hispanic	7,908	11.99%	10,290	8.86%
Native American, Non-Hispanic	203	0.31%	313	0.27%
Other, Non- Hispanic	650	0.99%	2,229	N/a
R/ECAP Family Type				
Total Families in R/ECAPs	13,651	-	23,968	-
Families with children	7,435	54.46%	13,280	55.41%

Source: Table 4

---

V.C.1.b.iv.(A). Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

*For question (1)(b)(iv)(A), refer to both the HUD-provided data and local data and local knowledge. Table 8 shows the racial/ethnic composition and percentage of households with children occupying public housing. Local data and local knowledge may be informative for both properties converted under RAD and for LIHTC developments.*

*Compare the demographic occupancy data of developments to other developments of the same category. In analyzing Table 8, be aware that the demographic occupancy information is affected by the size of the development — smaller developments may appear to have greater variance, but note that in small developments, a difference of a few units may alter the overall percentage of the occupancy demographic composition.*

Boston has no properties converted under RAD.

V.C.1.b.iv.(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

*For question (1)(b)(iv)(B), Table 8 is provided for program participants' use, however local data and local knowledge, including information obtained through the community participation process, may be particularly useful in answering this portion of the question.*

---

V.C.1.b.v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

*For question (1)(b)(v), refer to Table 8 and Map 5. Table 8 includes development-level demographic characteristics of residents of three program categories (public housing, project-based Section 8, and Other HUD Multifamily). Map 5 shows the location of individual developments for four program categories (public housing, project-based Section 8, Other HUD Multifamily, and LIHTC). Note that census tract boundaries may not align with "neighborhoods" or "areas" as commonly understood at the local level, and local knowledge may be useful to assist in the comparison.*

*Please note that HUD will add functionality to the Data and Mapping Tool to further sort and export census tract and occupancy demographic data from Map 5 to generate a table for the categories of publicly supported housing (i.e., public housing, project-based Section 8, Other HUD Multifamily Assisted developments (e.g., Sections 202 and 811), and LIHTC, provided that it will exclude occupancy demographic data for LIHTC developments, which should be analyzed using local data and local knowledge). Until such time, HUD provides program participants and the public with this data in an alternate tabular format in three ways: (1) directly to program participants, (2) through a link on the HUD Exchange AFFH webpage, and (3) as a hyperlink for download in Map 5 of the Data and Mapping Tool.*

*Compare the demographic occupancy data of developments to the areas in which they are located.*

*For the first program participants required to submit AFHs, HUD provides downloadable tables in Excel format showing demographics of developments and Census tracts in which they are located here. These tables will also be provided directly to these program participants. The file can be downloaded at: <https://www.hudexchange.info/resource/4845/affh-map-5-data/>*

According to the 2010 Census, the population Boston is composed primarily of "White alone," making up 53.9% of the population, followed by 24.4% "Black or African American alone", 17.5% "Hispanic or Hispanic," 8.9% "Asian alone," 3.9% "Two or more races", and 0.4% "American Indian and Alaska Native alone."

The population numbers provided by HUD for Boston show that white, non-Hispanics, make up the greatest percentage of the population with 47.01%, followed by 22.36% black, non-Hispanic, 17.47% Hispanic, 8.91% Asian or pacific islander, non-Hispanic, 0.20% native American, non-Hispanic, and 1.63% other, non-Hispanic.

The composition of the population of the region is composed of 74.87%, white, non-Hispanics, who make up the greatest percentage of the population, followed by 6.62% Blacks, non-Hispanic, 9.02% Hispanics, 6.45% Asians or pacific islanders, non-Hispanic, 0.14% native Americans, non-Hispanic, and 1.03% other, non-Hispanic.

---

## **Public Housing**

Of five public housing developments with a Black occupancy rate in excess of 60% three are located in a census tract with a black population that is 60% or greater. Overall there are eight public housing developments in a census tract which is primarily black but the percentage of black occupants in corresponding development varies from a low of 15% to a high of 84%. In contrast there are 6 developments with a black occupancy rate of 60% or greater but the corresponding composition of the census tract ranges from 25% to 68%.

There are three public housing development with a Hispanic occupancy rate in excess of 60% and one housing development with an Asian Occupancy rate in excess of 60%.Of these four developments only one is situated in a census tract in which the race or ethnic group is greater than 60%. The development has an Asian occupancy rate of 61% and is within a census tract which is 70% Asian.

There are six developments in which the occupancy rate for whites exceeds 60%. At four these developments whites are the predominant racial group with the occupancy rate ranging from 70% to 90%. Each of these developments is within a census tract which is predominately white. The population percentages range from a low of 77% to a high of 94%, with four of the six tracts where whites make up more than 80% of the population.

## **Project-Based Section 8[1]**

For Project-Based Section 8 developments there are thirty developments in which the occupancy rate for blacks exceeds 60%, twenty-two developments at which the occupancy rate for Hispanics exceeds 60% and 10 developments at which the occupancy rate for Asians exceeds 60%. It is only at fourteen developments at which blacks comprise more than 60% of the occupants that the composition of the census tract equals or exceeds 60% of the population, ranging from a low of 62% to a high of 84%. Hispanics and Asians do not exceed 60% of the population of the census tract of any of the other 40 developments. There are thirty-two Project-Based Section 8 developments at which the occupancy rate for whites exceeds 60%. Of these, twenty are in a census tract in which whites makeup sixty or greater percent of the population.

## **Other Multi-family**

There are six developments, three predominately white and three predominately black, at which the occupancy rate exceeds 60% and the corresponding percentage of the racial group equals or exceeds 60% of the population of the census tract. For whites the percentages of the population are 60%, 65% and 93% and for blacks 64%, 71% and 83%. The occupancy rates are 63%, 85% and 91% and 69%, 86% and 87%, respectively.

## **Low-Income Housing Tax Credit**

Insufficient data is provided to permit an analysis with respect to LIHTC developments.

---

### Developments with children

As would be expected based on an older White population and higher birth rates for Hispanics and Blacks in the overall population (see BPS report, *Build BPS*, released in March 2017) the developments with the lowest percentage of children are those which have the highest occupancy rates by whites and are located in census tracts which are predominately white. These developments are elderly disabled housing.

The developments with the highest occupancy rates for children are generally family developments and are located in census tracts in which blacks as a group predominate or in which blacks and Hispanics predominate.

The following is from the raw data for Boston jurisdiction (version 01 of AFFH Tables):

White households comprise the largest proportion of households in Boston at 55.4%; Blacks comprise slightly over a fifth (21.3%) of all household and Hispanics, 14.3%; Asian Pacific Islanders were recorded at 8.7% of all households.

### Households by Race and Ethnicity

White	134,305	55.4%
Black	51,705	21.3%
American Indian	442	0.2%
Hispanic	34,730	14.3%
Asian-PI	21,065	8.7%

The following (based on the raw data for Boston jurisdiction)[1] shows the total number of public housing units by race and ethnicity in the Boston jurisdiction. While 21.3% of all households in Boston are Black, this group comprises 35.1% of the public housing population in the City. The proportion of public housing residents who are Asian or Pacific Islander is basically the same (8.7%) as the proportion of Asian Pacific Islander households in the City (8.7%). Hispanic public housing residents are calculated at approximately 31%, compared to a Boston jurisdiction proportion of Hispanic households at 14.3%. While White households comprise 55.4% of Boston's households, they only comprise 19.7% of the White population in public housing units.

---

**Public Housing Units**

Total	10,251
Total number of black population in public housing units	3,055
Total number of Asian or Pacific islander population in public housing units	719
Total number of Hispanic population in public housing units	3,187
Total number of white population in public housing units	1,713
Percentage of black population in public housing units	35.14%
Percentage of Asian or Pacific islander population in public housing units	8.27%
Percentage of white population in public housing units	19.7%

The following is from the raw data for the Boston CBSA.[2] In 2010, White Households represented the largest composition in the CBSA at 75.8%; this was followed by Hispanic households at 9.1%; Blacks at 7.5%; and Asian Pacific Islanders at 7.2%.

**2010 Data**

Whites	340,8585	75.8%
Blacks	337,751	7.5%
Native Americans	16,406	0.4%
Asians PI	323,622	7.2%
Hispanics	410,516	9.1%

---

The following table showing the distribution of public housing units based on a Map 5 query, indicates that on average (data was not provided for some developments), 23% of the Units are White; 35% are Black; 32% are Hispanic; and 9% are Asian.[3]

Public housing units tend to be located in tracts where 36% of the population is White; tracts where 28% of the population is Black; 24% of the population is Hispanic; 9% of the population is Asian.

While there are some differences in the averages shown for Project-Based Section 8 and Public Housing, the major differences in composition are reflected in Other Multi-Family units. Here, a greater proportion of the units are held by Whites (39%), and a much lower rate for Hispanics (17%).

	Public Housing (Averages)[4]	Project-Based Section 8[5] (Averages)	Other Multi Family [6](Averages)
White Units (%)	23%	24%	39%
Black Units (%)	35%	33%	33%
Hispanic Units (%)	32%	31%	17%
Asian Units (%)	9%	11%	11%
HH with Children Units (%)	25%	29%	2%
Tract White (%)	36%	34%	35%
Tract Black (%)	28%	32%	28%
Tract Hispanic (%)	24%	21%	23%
Tract Asian (%)	9%	9%	9%
Census Tract Poverty Rate	32%	29%	25%



There are 29,515 households reported for Boston's R/ECAPs (not including Harbor or Thompson Islands). Thirty-nine (39.4%) of these households were Black (compared to 18.3% outside Boston R/ECAPs); 27.7% are Hispanic (compared to 12.1% outside Boston R/ECAPs); 16.7% of these households are White (compared to 59% outside Boston R/ECAPs); and 11.9% of all households in the 2010 Boston R/ECAPs are Asian/PI (compared to 8% outside the Boston R/ECAPs).

<b>AFFH_tract_v3.1_20160620</b>	<b>R/ECAPS 2010 Tracts</b>		<b>Boston NOT Incl R/ECAPS</b>		<b>All Boston Tracts[7]</b>
Total number of households (based on CHAS table 1)	29,515		218,897		248,412
Total number of white households (based on CHAS table 1)	4,933	16.7%	128,951	59.02%	133,884
Total number of black households (based on CHAS table 1)	11,616	39.4%	39,981	18.30%	51,597
Total number of Asian/ Pacific islander households (based on CHAS table 1)	3,523	11.9%	17,469	8.00%	20,992
Total number of Native American households (based on CHAS table	131	0.4%	305	0.14%	436
Total number of Hispanic households (based on CHAS table 1)	8,179	27.7%	26,440	12.10%	34,619
Total number of other race households (based on CHAS table 1)	1,107	3.8%	5,333	2.44%	6,440

There are approximately 8,380 households in all of Boston's R/ECAPs with one or more severe housing problems. Forty-two and six tenths percent (42.6%) of these households are Black (compared to a Black rate of 22.2% of all households with a one or more severe housing problems outside its R/ECAPs); 25.7% of all households with one or more severe housing problems are Hispanic (compared to 16.3% of all similar households outside of Boston's R/ECAPs); 13.7% of all households with one or more severe housing problems in R/ECAPs are White (compared to 49.17% in Boston, outside its R/ECAPs); and while Asian/PI households represent 13.4% of all with one or more severe housing problems, outside these areas this group comprises 9.19% of all households in this category.

<b>AFFH_tract_v3.1_20160620</b>	<b>R/ECAPs 2010 Tracts -24</b>		<b>Boston NOT Included R/ECAPs</b>		<b>All Boston Tracts - 179</b>
Total HH with one or more severe housing problem	8,380		54,147		62,527
Total white HH with one or more severe housing problem	1,144	13.7%	26,627	49.17%	27,771
Total black HH with one or more severe housing problem	3,561	42.6%	12,040	22.23%	15,601
Total Native American HH with one or more severe	53	0.6%	123	0.23%	176
Total Asian or Pacific islander HH with one or more severe housing problem	1,120	13.4%	4,977	9.19%	6,097
Total Hispanic HH with one or more severe housing problem	2,148	25.7%	8,832	16.31%	10,980
Total other race HH with one or more severe housing problem	342	4.1%	1,554	2.87%	1,896

There are 14,298 individuals over 5 years of age with a disability residing within Boston's R/ECAPs. 11.69% of these individuals are between 5 and 17 years; outside Boston R/ECAPs, this age grouping comprised 5.9% of all persons with a disability.

<b>AFFH_tract_v3.1_20160620</b>	<b>R/ECAPs 2010 Tracts</b>		<b>Boston-NOT Included R/ECAPs</b>		<b>All Boston Tracts</b>
Total population aged 5-17 with disabilities	1,671	11.69 %	3,414	5.90%	5,085
Total population aged 18-64 with disabilities	8,495	59.41 %	32,599	56.33%	41,094
Total population aged 65+ with disabilities	4,132	28.90 %	21,854	37.77%	25,986
<b>Total</b>	<b>14,298</b>		<b>57,867</b>		

Blacks comprised 41.68% of all persons living in Boston R/ECAPs in 2010; this compares to 21.7% of Blacks in Boston's population, outside of its R/ECAPs. Within the R/ECAPs, Hispanics comprised 30% of all residents, and 15.9% of all residents outside the Boston R/ECAPs. Whites comprised 16.47% of all residents within Boston's R/ECAPs, but 52.43% of all residents living outside of Boston's R/ECAPs. Asians/PI represented 11.38% of all residents within the R/ECAPs, and 9.53% of all residents, outside the R/ECAPs.

Using the 2010 R/ECAPs boundaries as geographic reference the 2000 Hispanic proportion of the population increased from 25.14% to 30.03%; it declined for Blacks from 48.15% to 41.68%; and increased slightly for Asian/PI from 10.97% to 11.38%, as well as for Whites, from 15.22% to 16.47%.

<b>AFFH_tract_v3.1_20160620</b>	<b>R/ECAPs 2010 Tracts -24</b>		<b>Boston NOT Incl R/ECAPs</b>		<b>All Boston Tracts - 179</b>
Number of whites in year 2010 (LTDB)	12,778	16.47%	277,283	52.43%	290,061
Number of blacks in year 2010 (LTDB)	32,330	41.68%	114,742	21.70%	147,072
Number of Native Americans in year 2010 (LTDB)	340	0.44%	1,865	0.35%	2,205
Number of Asians or Pacific islanders in year 2010 (LTDB)	8,826	11.38%	50,385	9.53%	59,211
Number of Hispanics islanders in year 2010 (LTDB)	23,288	30.03%	84,560	15.99%	107,848
Number of whites in year 2000	10,664	15.22%	280,955	55.42%	291,619
Number of blacks in year 2000	33,744	48.15%	117,462	23.17%	151,206
Number of Native Americans in year 2000	371	0.53%	1,949	0.38%	2,320
Number of Asians or Pacific islanders in year 2000	7,688	10.97%	39,114	7.72%	46,802
Number of Hispanics in year 2000	17,620	25.14%	67,436	13.30%	85,056

The foreign-born population increased within Boston R/ECAPs between 2000 and 2010 by 30.4% (21, 252 persons in 2000, to 27,715 persons in 2010); for the area outside of Boston R/ECAPs, the increase was only 6.4% (from 130,690 persons in 2000 to 139,090 persons in 2010). In the Boston jurisdiction, and for 2010, foreign born persons from Central America tend to be concentrated in East Boston (Honduras and El Salvador), but foreign-born persons from the Dominican Republic are more spread out in terms of R/ECAPs throughout the City. In terms of Asian foreign-born persons, Vietnamese tend to reside outside of R/ECAPs and show a concentration in Dorchester, while Chinese (except those from Hong Kong/Taiwan) are concentrated in Chinatown. Haitian and Jamaican persons who are foreign born tend to reside in the R/ECAPs in Mattapan and Dorchester.

The number of Limited English Proficiency persons increased within Boston's R/ECAPs from 16,096 in 2000, to 19,967 in 2010, or a percentage increase of 24%; the increase for Boston, outside the R/ECAPs, was much less, at 8.5%. East Boston shows concentration of LEP persons in 2010; there is a slightly smaller concentration in Chinatown. Generally, this is the same pattern for the 2000 and 1990 R/ECAPS boundaries.

<b>AFFH_tract_v3.1_20160620</b>	<b>R/ECAPs 2010 Tracts</b>	<b>Boston NOT Incl R/ECAPs</b>	<b>All Boston Tracts</b>
Foreign-born population in 2000	21,252	130,619	151,871
Foreign-born population in 2010	27,715	139,090	166,805
Population with limited English proficiency in 2000	16,096	74,979	91,075
Population with limited English proficiency in 2010	19,967	81,377	101,344

#### Notes

[1] AFFH\_juris-v3.1\_20160620, Version 1.0

[2] AFFH\_juris-v3.1\_20160620, Version 1.0

[3] An average for the entire Boston jurisdiction can obscure a range of different values for individual public housing where White, Black, Hispanic and Asian population can be higher or lower than the average.

[4] Data not available for: Franklin Hill Phase 1a; Heritage; Washington Beech Phase 2b; Mission Main Phase Iii; Davison Apartments; Washington Beech Phase 1a; Old Colony Phase 1.

[5] Data not available for: East Springfield St 38; Charlesview Inc.; Thane St Apartments; Northampton St 210-212; Greenwich Park 23

[6] Data not available for: Yee Realty; May West Roxbury Residences, Inc.; Hartwell Terrace; Bay Cove Group Homes Iv; Larchmont Residence; Pine Street Inn; Woodward Park House; Crawford House Apts.; Orchardfield Street Residence; West Roxbury Residences; Taurus Apartments

[7] All Boston does not include Harbor/Thompson Islands since they are zoned as open spaces, and averages based on their minimal residents will skew averages for the rest of Boston.

#### V.C.1.c. Disparities in Access to Opportunity

V.C.1.c.i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

*For question (1)(c)(i), refer to the opportunity indicators analyzed in Section D, and Maps 5 and 6, which are race/ethnicity dot density maps showing the locations of publicly supported housing developments (Map 5) and rates of Section 8 voucher utilization (Map 6) with R/ECAP outlines. Compare the locations of publicly supported housing to Maps 9 through 15, which depict the opportunity indicators. Note that while the location of housing may be relevant to analysis, it is not the only factor in analyzing disparities in access to opportunity. "Access" in this context encompasses consideration of infrastructure or policies related to where a person lives that impact an individual's ability to benefit from an opportunity, such as available transportation to a job, school enrollment policies, program eligibility criteria, or local labor laws. As noted above, Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations often reveal distinct patterns. Local knowledge may be particularly useful in answering this portion of the question.*

The Transit Index and the Job Proximity Index along with Map 8 and Map 9 indicate that the availability and access to public transportation and job proximity are not substantial factors to be considered in assessing access to opportunities with respect to the location of public housing developments and the location of R/ECAPS within the city limits of Boston and immediately surrounding communities. For the City of Boston and Cambridge and outlying communities the utilization of public transportation appears to be relatively high, in the range of 80.1% to 100%.

The Job Proximity Index appears within the same relative range not only for the City of Boston but also for the immediate surrounding communities and region and indicates no particular disparity with respect to the location of public housing or with respect to R/ECAPS with the exception of Roxbury, in the City of Boston. Included in this assessment is the Low Transportation Cost Index which again indicates no substantial disparity between the City of Boston, in general, and the location of individual public housing developments. Throughout the immediate Region transportation costs index is relatively high, 70.1 through 90.1, with no substantial variation within the City of Boston strongly suggesting that this is not a factor that substantially contributes to limiting access to opportunity.

The Labor Market Engagement Index (LMEI), however, shows no such similarity between the City of Boston and the surrounding region. While there are sections of the City of Boston with similar rankings on the Index, the R/ECAPS and areas immediately south of the R/ECAP areas show a disproportionately low level of labor market participation and an indication of lesser opportunities for educational achievement with some RECAPs having index rankings within the range of 0 to 10 or 10.1 to 20. As suggested above this lack of labor market participation is not accounted for by the lack of proximity to jobs nor by high transportation costs.

Most public housing in the Boston jurisdiction is located in tracts with a relatively low LMEI index (66 or lower). Relatively few public housing sites are in areas with a relatively high (85 to 99) LMEI index.

While there are a considerable number of Project Based Section 8 voucher units in parts of the city with a relatively low LMEI index, this type of publicly supported housing is more prominent in areas with a higher LMEI index: parts of Charleston, South Boston, South End, Jamaica Plain, Brighton and Alston.

**Percent Poverty Index (not counting students) by tracts and Publicly Supported Housing:**

There are 30 Public Housing sites in the Boston Jurisdiction located in tracts with a poverty rate between 20% and 33%; another 23 public housing sites are located in tracts with a poverty rate greater than 33%.

Most of the Project Based Section 8 housing units are located in tracts that are between 20% and 33% of the poverty rate; the few that are located in places with less than a 20% poverty rate are in parts of Brighton, Allston, Roslindale, West Roxbury, Jamaica Plain, Mattapan, South End, and Bay Village. Some Project Based Section 8 housing is located in areas where the poverty rate is greater than 33%; including parts of Roxbury, China Town, and South Boston.

**Other Multi-Family housing that are located in tracts with a poverty rate of 20% or greater are primarily in East Boston, Chinatown, Mission Hill, Roxbury, Dorchester and Mattapan.**

---

---

## Percent Welfare

Twenty-nine Public Housing sites in the Boston Jurisdiction are located in tracts where a welfare recipient rate is reported between 8% and 23% of families. Fourteen (14) Public Housing sites are found in tracts with a reported percent welfare recipient rate of 2% or less; these are found in parts of the North End, Back Bay, South End, West Roxbury, Mattapan, and Roxbury.

Approximately 62 Project Based Section 8 sites are located in tracts where a welfare recipient rate is reported between 8% and 23%. There are only a few Project Based Section 8 located in areas with a welfare recipient rate of 2% or less, and are mostly found in the North End, South End, Fenway, and South Boston.

Nineteen (19) Other Multi-Family housing sites are located in tracts where a welfare recipient rate is reported between 8% and 23%. Relatively few Other Multi-Family housing is located in tracts reporting a welfare rate of 2% or less.

### V.C.2. Additional Information

V.C.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

*For question 2(a), understanding the limitations of the HUD-provided data discussed in the introduction to the instructions, using local data and knowledge, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, family status, and limited data on disability. Include any relevant information about other protected characteristics — but note that the analysis of disability is also specifically considered in Section V(D). Program participants may include an analysis of disability here, but still must include such analysis in Section V(D).*

V.C.2.b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

*For question (2)(b), program participants may include any additional relevant information related to their analysis of publicly supported housing in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.*

---



In its efforts to promote greater access to opportunity the BHA offers to the residents at various developments programs that foster employment and career opportunities or provide skill development and educational opportunities.

### **Employment/Career Opportunities**

#### **DREAYM Program (Developing Resources by Educating Adult and Youth Minds)**

The DREAYM Program provides adult and youth Boston Housing Authority (BHA) residents with skills and education necessary for career advancement. Case Coordinators provide help with job search skills and placements, GED/HiSET, English as a Second Language (ESL) and post-secondary education classes. The program offers structured after-school and summer activities and childcare, transportation and healthcare support services. DREAYM is currently available to residents living in Alice Taylor, Barkley Apartments (Cathedral), Charlestown, Hailey Apartments, and Franklin Field.

#### **Public Housing Family Self-Sufficiency Program**

The Public Housing Family Self-Sufficiency Program (FSS) is designed to help families receiving rental assistance become self-supporting. This program is voluntary and open to all families living in BHA federal family public housing. The only requirements are a desire to become self-sufficient and a willingness to take the steps to make this happen. The FSS Program provides support and assistance to the entire family for up to five years.

#### **Career Family Opportunity Program**

Career Family Opportunity (CFO) is a collaboration between BHA and EMPATH (formerly known as Crittenden Women's Union) helping single parents achieve economic independence. Participants create personalized plans to map out their educational, career and financial goals. The program provides ongoing support, financial incentives and referrals to resources that help participants meet their goals. Program participants receive support through Mobility Mentors who meet with program participants regularly.

### **Skills Training/Educational Opportunities**

#### **Building Pathways**

Building Pathways is a seven-week pre-apprenticeship program to prepare participants for a career in the building and construction trades. This program is open to all Boston Housing Authority (BHA) residents and City of Boston residents who meet Section 3 requirements for low and very-low income. Participants will receive coordinated case management and job placement services.

#### **Charlestown Adult Education Program (ESL/GED/HiSET)**

This program offers preparatory HiSET (formerly known as GED) and HiSET(GED) classes to adults (18 years and older) who wish to complete their high school education. The program also offers English as a Second Language (ESL) classes. In addition to classroom instruction, students may also access individualized tutoring and computer skills classes. Preference is

---

given to BHA residents of the Charlestown development.

**Northeastern University Scholarship**

This scholarship provides full-time undergraduate studies at Northeastern University's Residential College for the duration of the program. Graduating high school seniors or transfer students living in BHA public housing (including HOPE VI sites) are eligible to apply for this scholarship. Each year, BHA checks eligibility for each student living in public housing. In November/December, BHA and Northeastern University host special Information Sessions for public housing residents who are interested in applying for the scholarships. Interested residents are strongly encouraged to attend one of these sessions. This scholarship is currently open to BHA public housing residents only.

**Housing Authority Insurance Group, Inc. (HAIG) Resident Scholarship Program**

The Resident Scholarship Program is sponsored by the HAIG Inc., one of BHA's insurance providers. The program offers BHA residents scholarships to attend college, university or technical school. Residents living in public housing or Section 8/leased housing for at least six months prior to the application deadline (April 30) can be entered into a drawing for a chance to be awarded one of 50 scholarships, worth \$2,500 each. This process occurs yearly. The scholarship may be used to pay for tuition, books or school supplies and the funds are deposited in a special account that goes directly to the school or college.

**Boston Public Computing Center**

The Boston Public Computing Center is a partnership between BHA, Boston Centers for Youth & Families, Boston Public Library and the City of Boston's Department of Innovation and Technology. Beginning in 2009, this effort created new and/or upgraded existing computer labs throughout the City of Boston. The purpose is to provide low-income Boston residents, particularly BHA residents, access to high speed Internet and up-to-date software with the intent to learn how to use technology for education, employment and improved access to vital resources.

BHA has 10 computer centers in collaboration with some of its local tenant organizations and other community based organizations. Some centers are operated by BHA partners, and other are run directly by BHA. The centers are open to the public and have varying business hours.

**Youth and Family Services****Educating the Mind and Leaving Drugs and Violence Behind**

Educating the Mind is a five-week mentorship basketball league and clinic that takes place over five weeks in the summer. Boston Housing Authority (BHA) residents ages 8 through 18 are encouraged to cultivate their skills on the court – and not engage in violence and substance abuse. Participants are transported to the Boys & Girls Club in Roxbury and attend conflict resolution and drug prevention workshops prior to basketball practice.

---

**Youth Leadership Institute (YLI)**

BHA's Youth Leadership Institute (YLI) is a youth mentorship and work experience program established in the summer of 2010 in partnership with the City of Boston and various community partners. The purpose is to prepare BHA resident ages 15 through 21 the necessary skills for the work force.

**HOPELINE/Youth Employment**

BHA partners with Boston Youth Fund (BYF) to offer young people a positive job experience. Each February, youth applicants register with the BYF SuccessLink to be eligible for being offered a summer job. Registrants must be a resident of the City of Boston between the ages of 15 and 17. Boston Youth Fund strives to hire as many SuccessLink applicants as possible.

**Smart from the Start**

Smart from the Start is a family support, community engagement and school readiness program designed to empower low-income families with young children overcome the achievement gap and chronic poverty. This program is available to public housing and Section 8 residents in Charlestown, Roslindale, Mattapan, Dorchester, Jamaica Plain, Lower Roxbury and the South End.

**Big Brothers Big Sisters (BBBS)**

Big Brothers Big Sisters and the Big Sisters of Greater Boston offer an ongoing, one-on-one mentoring program that pairs children 7 through 12 years of age ("Littles") with an adult guide ("Bigs"). Bigs and Littles participate in various activities together, offering an opportunity for both to learn and grow while having a positive impact on their communities. This program is available to residents throughout the City and is often coordinated with the child's school; we also have several special programs at Mildred C. Hailey Apartments, Franklin Field and Lenox Camden.

**Girl Scouts of America**

Girl Scouting builds girls of courage, confidence and character to make the world a better place. Girl Scouts of Eastern Massachusetts serves girls grades K-12 and engages adult volunteers in the 178 communities they serve. Girl Scouts are currently offering a variety of programs for BHA residents at or near BHA housing developments. Girl Scouts also offers summer camp experiences.

**After School Program Collaborations****YouthLink**

Youth Link offers prevention and early intervention programs in partnership with police departments, housing authorities and dedicated business leaders who support eliminating crime by offering new possibilities to youth at risk of violence and gang involvement. The program has offered programs to youth living in BHA's Franklin Field Development since 2008.

Youth Link Academy approaches are based on best practices to help young people develop important life skills necessary to have a positive impact in their communities and schools. Core

---

facets of the program include mentoring, college prep and tours, culinary arts, leadership, communication and presentation skills and mediation training. Youth Link's efforts have resulted in reduced juvenile crime, increased educational attainments and goal attainment.

### **Boston Centers for Youth and Families (BCYF)**

Boston Centers for Youth and Families (BCYF) offers a range of affordable programs for preschool and school-aged children and adults. Programs offered include education, family literacy, youth employment, violence prevention & intervention, senior activities, recreation and enrichment. BCYF has 35 facilities throughout Boston. BCYF's programs also include Summer Camps.

### **V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy**

*For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with publicly supported housing, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to publicly supported housing.*

- X Admissions and occupancy policies and procedures, including preferences in publicly supported housing
  - Land use and zoning laws
  - Community opposition
- X Impediments to mobility
- X Lack of private investment in specific neighborhoods
- X Lack of public investment in specific neighborhoods, including services and amenities
  - Lack of regional cooperation
  - Occupancy codes and restrictions
  - Quality of affordable housing information programs
  - Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
  - Source of income discrimination

---

## Disability and Access Analysis

### V.D.1. Population Profile

V.D.1.a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

*For question (1)(a), refer to Maps 14-A and 14-B14 in Appendix A and Table 13 in Appendix B. Map 14-A depicts a dot density distribution for three disability types (hearing, vision, cognition) for the jurisdiction and the region. Map 14-B depicts a dot density distribution for three additional disability types (ambulatory, self-care, independent living) for the jurisdiction and the region. The maps also include R/ECAP outlines. Table 13 provides data on the percentage of the population with types of disabilities in the jurisdiction and the region.*

Based on the data in Table 13, there are a higher percentage of people within the City of Boston than in the metro region for all disability types except for hearing difficulty. The greatest differences are in the percentage of persons with ambulatory difficulties (1.17% higher in Boston) and cognitive disabilities (about 1% higher in Boston). This is probably a reflection of the higher number of subsidized and supportive housing units in the City of Boston than in the metro region. The two maps do not appear to show any significant concentration of any of the six disability types within the City or the metro region nor does there appear to be any concentration of persons with disabilities or specific disability types within R/ECAP areas.

V.D.1.b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

*For question (1)(b), refer to Maps 14-A and 14-B, Map 15 and Table 14. Map 15 depicts a dot density distribution of persons with disabilities by age (5-17, 18-64, and 65+) for the jurisdiction and the region. Table 14 provides data on the percentage of the population with disabilities by age for the jurisdiction and the region.*

Based on the data in Table 14, the City of Boston and the metro region both have roughly the same percentages of young people with disabilities and elderly persons with disabilities. The percentage of the working-age population with a disability is about 1.6% higher in the City of Boston than in the metro region. Map 15 does appear to show some clustering of working age persons with disabilities in R/ECAPs and adjacent Census tracts. However, the dot density map may overstate the actual concentration because it shows the distribution of the raw number of persons with disabilities rather than the rate. Census tracts with a larger total population will therefore very likely also have a higher number of persons with disabilities. This clustering is likely reflecting the high percentage of persons with disabilities in public housing and project-based section 8 housing developments.

---

---

## V.D.2. Housing Accessibility

### V.D.2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

*For question (2)(a) HUD is unable to provide data at this time, as there is limited nationally available disability-related data at this time, including data relating to accessible housing; however, to assist with answering these questions, program participants may refer to the maps provided by HUD to identify R/ECAPs or other segregated areas identified in previous sections.*

According to the most recent data from the American Community Survey, approximately 75,100 people - nearly 12 percent of Boston's population - have a disability. Of those with a disability, about 48,400 are under age 65. Accessible housing is one of the most important needs of persons with certain types of disabilities, especially the approximately 22,300 non-elderly persons with ambulatory disabilities. Special housing adaptations are also important to ensure the safety and quality of life of the 9,800 non-elderly persons with visual disabilities and the 7,400 with auditory disabilities.<sup>14</sup>

Unfortunately there are no hard data available to enable us to accurately quantify the number of accessible units currently available nor to quantify the unmet need for accessible housing for persons with specific disability types. We do not know how many of the persons with disabilities are already housed in a unit that meets their needs. We also don't know how many of the persons with disabilities are part of a single household with more than one person with a disability. What we do know based on testimony at our engagement meetings, long waiting lists for units in public and assisted housing, and the rapidly growing number of aging baby boomers in Boston and the metro region is that we need more accessible units, including subsidized units for low-income persons. We do know that a substantial number of Boston's multifamily housing developments were built before 1991 when the Fair Housing act began to require that multifamily properties must meet federal accessibility standards.

We received written testimony from a local disability advocacy group that shared stories about its members reflecting the following experiences and concerns:

- Some program participants are housed inappropriate to their accessibility needs. Ex: some program participants live on the third floor of a triple decker with very narrow stairs. Leaving the apartment requires the residents to crawl up and down the stairs, leaving them without a mobility device when they leave the house.
- Some program participants cannot afford to make the reasonable modifications needed.
- Some program participants have a difficult time finding affordable housing that has a second room for a personal care attendant.
- Some program participants have a range of disabilities including physical, sensory, and mental health needs.

---

<sup>14</sup> City of Boston, Disability Housing Task Force 2016 Goals and Actions. *City of Boston*. July 2017

---

- Some program participants face barriers to accessing housing related to prior arrests and convictions. Some participants have been able to have their criminal records sealed, but now face difficulty finding a fully accessible unit using a mobile voucher.
- For many low income program participants a constant source of stress is not being able to find a unit as a voucher holder in the time allotted.
- Not being able to find a unit that is covered by the costs of the voucher
- Having other assistance needs that are not covered by health insurance, afforded in their current housing, or they cannot afford to pay out of pocket for.<sup>15</sup>

**V.D.2.b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?**

*For question (2)(b) HUD is unable to provide data at this time. Single-family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a HUD-funded program or other program providing for accessibility features. The Fair Housing Act requires that most multi-family properties built after 1991 meet federal accessibility standards. As a result, multifamily housing built after this date, if built in compliance with federal law would meet this minimum level of accessibility, while buildings built before this date generally would not be accessible. The age of housing stock can be a useful measure in answering this question. In addition, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments. Map 5, which shows the location of four types of publicly supported housing, may also be useful in answering this question.*

Unfortunately there are no hard data available to enable us to accurately quantify the number and locations of accessible units in the City of Boston or in the metro region. We do know that many of Boston's public and subsidized multi-family housing developments are located in R/ECAPs or adjacent areas with a high proportion of racial and/or ethnic "minorities". Also, Boston has among the highest percentage of pre-1940 housing stock in the county, including a large number of turn of the century Victorian single-family and triple-decker homes. Most of these homes have narrow doorways, stairs at the entrances and between floors and may not be easily or affordably made accessible. And although the City complies with the Section 504 requirements, we have not maintained an inventory of these units once they are completed and occupied. As part of the recently issued Disability Housing Task Force Report, the City has committed to establishing a centralized database of all City-funded units already created for persons with disabilities.

<sup>15</sup> Boston Center for Independent Living. Participant Case Studies. (2016)

---

**V.D.2.c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?**

*For question (2)(c), refer to Table 15. Table 15 provides data on the number and percentage of persons with disabilities residing in four categories of publicly supported housing in both the jurisdiction and the region. In answering the question, consider policies and practices that impact individuals' ability to access the housing, including such things as wait list procedures, admissions or occupancy policies (e.g., income targeting for new admissions), residency preferences, availability of different accessibility features, and website accessibility.*

The City of Boston and Boston Housing Authority do not discriminate based on disability and provide fair access to all buildings. Housing eligibility varies by Public Housing or Section 8/Leased Housing programs. BHA staff evaluate each individual application and make an eligibility decision based on the selection criteria for the specific program. For Elderly/Disabled housing: The head or co-head of the household must be 60 years of age or older or 62 years of age or older, depending on whether the program is state or federally funded or disabled as defined by law. (<http://www.bostonhousing.org/en/For-Applicants/Do-I-Qualify-for-BHA-Housing.aspx>).

According to the HUD-provided data in Table 15, public housing units have the highest percentage of units occupied by a household with a person with a disability. Nearly 38% of federally-funded public housing units in Boston and 34% of those in the metro area are occupied by disabled persons. These public housing figures include family developments as well as developments targeted exclusively to elderly or disabled persons. Section 8 Housing Choice Vouchers also have very high rates of participation (28% in Boston, 29% in the metro region) by qualified households with a person with a disability and are serve the largest number of such households. While the percentage of disabled households served by Project-Based Section 8s (15.4% in Boston, 18.2% on the metro region) is lower than those for public housing and Housing Choice Vouchers, the number of such households is larger than the number served in public housing. Finally, HUD's data shows that the numbers and percentages of disabled households served by other HUD multifamily programs such as Section 202, Section 811, Section 221(d)(3), etc. relatively low compared to the other three programs.

We should point out that HUD's figures do not include state-funded public housing units, the Massachusetts Rental Voucher Program (MRVP), and rental vouchers funded under programs such as the Shelter Plus Care program and the Housing Opportunities for Persons With AIDS program.

Although Boston is fortunate to have a significant number of public housing and subsidized assisted housing units set aside for low-income persons with disabilities, the need for such units far exceeds the supply. There is also a need for accessible units for those who have incomes that are too high to qualify for subsidized rental units, or who are lower-income homeowners needing adaptations to enable them to live comfortably and safely in their homes. Recognizing the need for increasing access to housing for persons with disabilities, the City of Boston and its nonprofit partners created the Mayor's Disability Housing Task Force (DHTF) to ensure that housing is accessible for persons with disabilities. The DHTF's membership reflects the

---



expertise and experience of housing service providers for persons with disabilities, advocates for these communities, funders, and representatives from City and State agencies.<sup>16</sup>

### V.D.3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

*Instructions: Local data and knowledge will likely be particularly useful in answering questions (3)(a) and (b). Sources of location data and local knowledge may include, among others, individuals with disabilities, federally-funded independent living centers, state protection and advocacy organizations, advocacy organizations representing the spectrum of disabilities, state developmental disability councils and agencies, and state mental health/behavioral health agencies. Topics for consideration may include the length of wait lists for accessible units in publicly supported housing, availability of accessible units in non-publicly supported housing available to HCV participants, whether public funding (e.g. CDBG funds) or tax credits are available for reasonable modifications in rental units and/or for homeowners, whether accessible units are occupied by households requiring accessibility features, and whether publicly supported housing is in compliance with accessibility requirements.*

*The Fair Housing Act, Section 504, and the ADA contain mandates related to integrated settings for persons with disabilities. Integrated settings are those that enable individuals with disabilities to live and interact with individuals without disabilities to the greatest extent possible and receive the healthcare and supportive services from the provider of their choice. To answer questions (3)(a) and (b), refer to HUD's "Statement of the Department of Housing and Urban Development on the Role of Housing in Accomplishing the Goals of Olmstead." (HUD's OlmsteadStatement can be found at: <http://portal.hud.gov/hudportal/documents/huddoc?id=OlmsteadGuidnc060413.pdf>.)*

*Local data and local knowledge will likely be particularly useful in answering questions. To ensure meaningful analysis of these questions, program participants may need to obtain information from state disability service authorities, which may include, for example, the developmental disabilities authority, mental health authority, social or human services department, and the state Medicaid agency, each of which is likely to have ready access to reliable information concerning the location and frequency of individuals with disabilities. A state's Olmstead Plan may contain useful information in answering these questions.*

#### V.D.3.a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Since the 1970s, Massachusetts has made significant progress in transitioning persons with disabilities from institutional facilities and into community-based residential settings integrated into their local communities. In 2008, the Commonwealth adopted the Community First Olmstead Plan which was “designed to maximize the extent to which elders and people with disabilities of all ages are able to live successfully in their homes and communities. The fundamental goals of the Olmstead Plan are to help individuals transition from institutional care; expand access to community-based long-term supports; improve the capacity and quality of long-term supports in the community; expand access to affordable and accessible housing and supports; promote employment of persons with disabilities and elders; and promote awareness

<sup>16</sup> Idem.

of long-term supports". The Commonwealth is currently undertaking a new community engagement and planning process to develop an updated Olmstead Plan. Here is a link for additional information on the current plan and the ongoing planning process.

<http://www.mass.gov/eohhs/consumer/disability-services/living-supports/community-first/community-first-olmstead-plan.html>

With regard to public housing, applicants for and participants in BHA public housing are housed without regard to disability. The BHA does, however, grant disabled applicants a preference in its priority preference system in an effort to afford disabled individuals and families equal access to its housing programs. Persons with disabilities may elect to be housed in a family development or elderly/disabled housing. With respect to both programs the BHA is compliant with 24 CFR § 8.22 and 24 CFR § 8.23. Under the BHA's HUD approved Designated Housing Plan the populations in elderly/disabled buildings are maintained at an 80/20 ratio of elderly/disabled to afford adequate housing opportunities for elderly families. Disabled residents who may be adversely impacted by this Plan are eligible to receive a housing choice voucher.

**V.D.3.b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.**

Massachusetts residents with disabilities, including those in the City of Boston, are fortunate to have access to a very wide range of available supportive services. These include services for the following disabled populations:

Vision Impairment

<http://www.mass.gov/eohhs/consumer/disability-services/services-by-type/blind-services/>

Hearing impaired

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/>

Intellectual Disability

<http://www.mass.gov/eohhs/consumer/disability-services/services-by-type/intellectual-disability/>

Learning Disabilities

<http://www.mass.gov/eohhs/consumer/disability-services/services-by-type/learning-disability/>

---

## Mental Health Services

<http://www.mass.gov/eohhs/consumer/behavioral-health/mental-health/>

## Services for Children and Youth with Special Health Needs

<http://www.mass.gov/eohhs/gov/departments/dph/programs/family-health/children-and-youth-with-special-health-care-needs-program.html>

There are also multiple nonprofits who provide a range of disability support services. Although Massachusetts is fortunate, there is consensus that demand outpaces the services available. Low income residents who speak languages other than English are particularly groups who have disability needs who have a higher demand than the services that are available.

With regard to affordable housing for persons with disabilities, there remains a significant shortfall in the supply of available units both in Boston and throughout the metro region. One aspect of the problem is simply the overall shortage of subsidized housing units, especially in many of the suburban communities outside Boston. And while units in older subsidized housing developments in Boston and elsewhere may be affordable, they may not be fully accessible for persons with disabilities or may not be located near accessible public transportation. In addition, over time many accessible subsidized housing units may have become occupied by non-disabled households. In the recently issued Disability Housing Task Force Report, the City has proposed a number of concrete strategies to increase the shortage of affordable units available for persons with disabilities. These will be discussed in more detail in the Goals and priorities section of the Assessment of Fair Housing.

In addition to increasing the supply of affordable housing for persons with disabilities, it is important to improve the ability of persons with disabilities to be able to locate and access information on existing accessible affordable housing units. In 2008, the Citizen's Housing and Planning Association and the Massachusetts Rehabilitation Commission joined together to launch the Mass Access Registry, a website designed to "help bridge the gap between residents in need of affordable, accessible housing and available apartments across the state". The website provides access to a searchable database of affordable rental housing in Massachusetts, including accessible and adaptable homes for people with disabilities. The website includes vacancy and waitlist information for all affordable rental housing in Massachusetts, particularly for people with disabilities.

<http://www.massaccesshousingregistry.org/>

---

#### V.D.4. Disparities in Access to Opportunity

*For questions (4)(a)-(c), HUD is unable to provide data, as there is limited nationally available disability-related data. Local data and local knowledge will likely be particularly useful in answering questions.*

Like HUD, the Boston Housing Authority and the City of Boston do not have access to sufficient hard data to reliably quantify disparities in access to opportunity for persons with disabilities. However, through testimony presented at engagement meetings conducted in conjunction with the development of this Assessment of Fair Housing and at the Disabilities Community Forum hosted by the City of Boston's Commission on Disabilities, substantial anecdotal evidence was presented concerning significant problems in access to transportation, education and recreational opportunities. Issues identified included that Uber and Lyft are required to provide an accessible vehicle upon request. However, generally vehicles accessible to wheelchair users are not available. There is a lack of accessible vans and Uber/Lyft drivers are not trained on reasonable accommodation and or how to assist persons with disabilities in and out of their vehicles. The City of Boston's Disability Housing task force also issued a report citing the many needs of the disabled community from an increase in affordable accessible housing developed, exploring accessibility loan programs for owners to support home modifications for disabled persons, and promoting access to homeownership opportunities for persons with disabilities.<sup>17</sup> This report includes a list of comprehensive recommendations the City of Boston is pursuing. The Disability Housing task force includes advocacy agencies and persons who represent a broad base of Boston residents with disabilities.

##### V.D.4.a. To what extent are persons with disabilities able to access the following?

*Identify major barriers faced concerning:*

- i. Government services and facilities*
- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)*
- iii. Transportation*
- iv. Proficient schools and educational programs*
- v. Jobs*

Government services and facilities: For the most part, government services and facilities are accessible to persons with mobility disabilities. The City's Commission on Persons with Disabilities was successful in advocating for an accessible City Council chambers via the inclusion of large screens and close caption provided for the deaf and or hard of hearing. However, there are still significant barriers for persons with communication disabilities. The City recently passed the Boston Communications Access Ordinance which guarantees translation, interpretation and assistive technology for access to City services regardless of English language proficiency or communications disability. Implementation of the ordinance is

<sup>17</sup> City of Boston, Disability Housing Task Force 2016 Goals and Actions. *City of Boston*. July 2017

underway. The City just hired a communications access coordinator who is housed in the City's 311 program, the City's call center for all City services. The coordinator will be assessing how to streamline and improve language and communication services provided throughout all City services.

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals): Boston is a historic city and as such, many of its historic features such as narrow, cobblestone or brick sidewalks in historic neighborhoods pose significant barriers to persons with mobility disabilities. There have been ongoing legal battles between the City and residents of Boston's historic Beacon Hill neighborhood regarding the installation on ADA compliant sidewalk ramps.

Transportation: Most of the transportation services administered by the Metro Boston Transportation Authority (MBTA) are accessible to persons with disabilities, including the Commuter Rail, subways and busses. We have received many complaints that elevators and escalators are often not working and users are not always alerted to this. We have received many complaints about the MBTA's paratransit RIDE service. The RIDE provides door-to-door paratransit service to sixty cities and towns for eligible customers who cannot use subways, buses, or trains due to a physical, mental, or cognitive disability. However, we have heard that it often fails to arrive when scheduled. We have also received testimony that there are not enough accessible taxis and that Uber and Lyft have very few accessible vehicles.

Proficient schools and educational programs: We have received testimony regarding deficiencies in public school programs and facilities for persons with disabilities, especially for students with hearing or visual disabilities or special needs issues such as autism. The Boston Public Schools has developed plans to improve access to services for children with disabilities. In general the feedback received is the demand for additional services far outweighs the programs that are availability. Boston is known for high quality healthcare services with a plethora of hospitals and community health centers. Even in Boston, we hear anecdotally of families waiting up to a year for an appointment with a specialist for an Autism diagnosis. Even after diagnosis, the wait for therapeutic services can be up to six months. Boston, like many major Cities has a shortage of medical specialist and there are many diagnostic groups that can be included here for having long wait lists for diagnosis and support services.

**V.D.4.b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.**

According to the Americans with Disabilities Act, The Fair Housing Act, and Massachusetts Anti-discrimination law M.G.L. 151B, disabled tenants may be able to make a reasonable accommodations request of their landlord. A reasonable accommodation means that a housing authority or subsidized development makes certain adjustments in rules, policies, services, or even the physical structure of an apartment so that a tenant may have full use of their home. This means that sometimes housing authorities and subsidized landlords need to make exceptions and do things differently to enable a person who is disabled to participate more

easily in a housing program. Individuals with a disability also have a right to a reasonable accommodation in a housing provider's rules, policies, practices, or services, when such accommodation may be necessary to afford the disabled individual an equal opportunity to use and enjoy their dwelling.

If a housing provider refuses to engage in the interactive process when a request for a reasonable accommodation is made, the complainant (aggrieved party) may file a complaint with its local Fair Housing Assistance, FHAP program. For Boston, the FHAP agencies are the MCAD and the BFHC. The housing provider must also engage in the same interactive process for a request for a reasonable modification, even if the cost is such that the tenant may be paying for it themselves. Refusal to engage in this process and or ignoring such requests can result in a housing discrimination complaint at the MCAD or the BFHC.

For public housing, the Boston Housing Authority has the following process in place for requesting a reasonable accommodation: A request for a reasonable accommodation can be made by a BHA client with a disability. The client may request a change to one of BHA's policies, procedures or practices in order to provide the client with an equal opportunity to use and enjoy BHA housing and programs that they otherwise could not due to their disability. "Reasonable accommodation" also includes physical changes to units that an applicant or resident may need due to a disability.

The BFHC provides outreach and education on fair housing rights including reasonable accommodation and modification requests and works with the Commission for persons with disabilities and other nonprofit disability advocacy services to raise awareness of the right of a disabled tenant to make a reasonable accommodation request. When the BFHC issues a charge, either party can also elect to take the case to the Massachusetts Attorney General's office. In such cases, the AG's office has been able to settle these cases with significant damages for the complainants. The following is the result of a case the BFHC investigated and issued a charge in.

Mission Park LP, Roxbury Tenants Association of Harvard (RTH), Inc., and Trinity Management, LLC

Mission Park and RTH together own residential apartments located in several buildings in the Roxbury neighborhood of Boston, including the Mission Park properties, which are managed by Trinity.

According a complaint filed by the AG's Office, these three entities engaged in a pattern of discriminatory and unlawful housing practices against a tenant on the basis of her disability by repeatedly failing to provide reasonable accommodations and modifications to her residence. The tenant has spina bifida and uses a wheelchair.

The tenant's mother repeatedly expressed her need for a wheelchair-accessible unit, including an accessible bathroom, doorways, kitchen counters, and entrances. The tenant also asked for permission to keep an emotional support dog. In each instance, the defendants allegedly failed to engage in an interactive dialogue, required burdensome

---

and unnecessary paperwork, and unreasonably delayed or refused to provide the reasonable modifications or accommodations.

Pursuant to a consent judgment filed in Suffolk Superior Court, the defendants have agreed to pay a total of \$60,000, including \$40,000 in damages to the complainants, \$15,000 to the Commonwealth, and \$5,000 to be used for education programs for tenants with disabilities. The defendants are also required institute comprehensive anti-discrimination policies and provide fair housing training for staff.

The BFHC requires the following post a charge finding and or settlement in cases where there was a denial of a reasonable accommodation:

- The housing provider must provide a policy for processing reasonable accommodation requests in writing to the BFHC.
- The housing and or management company and or other parties charged in the complaint must attend fair housing training focused on disability, reasonable accommodation and modifications.

The City of Boston's Disabilities Commission tracks Boston's efforts to meet compliance with the Americans with Disabilities Act. The ADA Title II coordinator for Boston is Disabilities Commissioner. Residents can file a grievance if they think the City has discriminated against them because they have a disability, or for not providing access to meetings, services, programs, or activities according to the Americans with Disabilities Act requirements. This includes, but is not limited to public accommodations like sidewalks, access to restaurants, and accessible parking developed publicly or privately within the City of Boston. Complaints associated with public accommodations may also be filed with the MCAD.

It is BHA's policy to provide accommodations in accordance with the requirements of disability law. The policy also supports BHA's goal of providing stable, quality and affordable housing to low- and moderate-income persons regardless of disability. The BHA has a reasonable accommodation coordinator that residents can speak to about their request. This information is provide on the BHA's website and in their lease agreements.

<https://www.bostonhousing.org/en/Center-for-Community-Engagement/Civil-Rights/Reasonable-Accommodation-Requests.aspx>

Several nonprofit advocacy groups have also pursued civil action in cases of public and private reasonable accommodation. Most notably are cases against the MBTA and the Beacon Hill neighborhoods refusal of reasonable accommodations to City sidewalks based on historic preservation concerns.



---

**V.D.4.c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.**

Many persons with disabilities have extremely low incomes, supported only by SSI and other forms of disability payments. As a result they do not have sufficient income to qualify for a mortgage even with downpayment and closing cost assistance. Even many middle income households with a disability may face barriers in the homeownership market due to the limited number of accessible units without stairs at the entry or between floors, lack of accessible doorways and bathrooms in many older housing units, etc. In addition, we heard first-hand accounts of blatant discrimination against persons with disabilities by realtors and rental agents.

**V.D.5. Disproportionate Housing Needs**

**V.D.5.a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.**

*For question (5)(a), program participants may refer to Tables 9, 10, and 11 and Maps 7 and 8 for data relating to disproportionate housing needs. However, this data is not specific to individuals with disabilities, as such local data and local knowledge may be particularly useful in answering this question.*

We do not have any hard data on disproportionate housing needs specific to persons with disabilities. However, whereas many persons with disabilities are unable to work or have to rely only on SSI or other limited sources of income we can assume that they face many of the same obstacles faced by other extremely low-income households. Disproportionate housing needs are explored in a separate section of this Assessment of Fair Housing.

**V.D.6. Additional Information**

**V.D.6.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.**

*Understanding the limitations of the HUD-provided data discussed above, complete question (6)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on certain types of disabilities and for the ages of persons with disabilities. Include any relevant information about other protected characteristics.*

We do not have any additional hard data on this issue. We will solicit additional community input on these issues and incorporate the findings into the final draft.

**V.D.6.b. The program participant may also describe other information relevant to its assessment of disability and access issues.**

---



*For question (6)(b), program participants may include any additional relevant information related to their analysis of disability and access in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation, and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.*

We have received testimony regarding the lack of affordable accessible homeownership opportunities for persons with disabilities, including for middle-income households who do not qualify for subsidized housing programs but are still priced out of Boston's housing market. We will solicit additional community input on these issues.

#### **V.D.7. Disability and Access Issues Contributing Factors**

*For question (7), consider the list of factors provided, which are those most commonly associated with disability and access, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to disability and access.*

- Access to proficient schools for persons with disabilities
- X Access to publicly supported housing for persons with disabilities
- X Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- X Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Land use and zoning laws
- Lending Discrimination
- Location of accessible housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

---

## Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

V.E.1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, 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 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.

*Complete question (1). A summary of cases would typically include the parties, claims, and current status.*

The following represents BFHC unresolved charges.

Open Cases post Cause Determination involving allegations of violations of fair housing law as of August 1, 2017:

Case name: Keyles v. DEJ Realty Trust

BFHC Number: 2016-BFHC-028

HUD Number: 01-17-5554-8

Basis: disability

Allegation: Refusal to grant a reasonable accommodation, refusal to rent.

Case status: Judicial determination elected, case transferred to Massachusetts Attorney General's Office for enforcement.

Case name: McMillan v. Acker, et al.

BFHC Number: 2017-BFHC-010

HUD Number: n/a

Basis: receipt of rental assistance.

Allegation: Discriminatory statements by Owners to prospective renter.

Case status: Conciliation, pre-hearing is pending.

Case name: Bellegarde v. Advanced Realty Management

BFHC Number: 2015-BFHC-007

HUD Number: 01-15-0282-8

Basis: disability.

Allegation: Refusal to grant a reasonable accommodation.

Case status: Conciliation, pre-hearing is pending.

Case name: Bullock v. Sullivan

BFHC Number: 2017-BFHC-015

HUD Number: n/a

Basis: receipt of rental assistance.

Allegation: Refusal to negotiate for rent, discriminatory statements.

Case status: Cause Determination is with MCAD for a substantial weight review.

---

Case name: Stokel v. Linder

BFHC Number: 2007-BFHC-028

HUD Number: 01-07-0522-8

Basis: national origin.

Allegations: Inquiry into prospective tenant's national origin by Broker.

Case status: Decision on liability issued post administrative hearing in 2010, Respondent appealed to Superior Court and then Appeals Court. The decision remanded to the Commission for a review of the damages award, decision on liability was upheld on appeal.

Unresolved charges from the MCAD will be included in the final version of the assessment of fair housing as will any addition information received from partner agencies regarding pending Civil Rights issues.

**V.E.2. Describe any state or local fair housing laws. What characteristics are protected under each law?**

*Complete question (2).*

Under the Massachusetts Antidiscrimination Law, [M.G.L. c. 151B](#), it is illegal to discriminate against someone in the sale or rental of housing because of a person's membership in one of the following protected classes:

- Race
- Color
- Religious creed
- National origin
- Ancestry
- Sex
- Marital status
- Veteran status
- Age
- Handicap/disability
- Gender Identity
- Sexual orientation
- Children
- Public assistance
- Children/Lead Paint
- Public Assistance Recipient (e.g., Section 8 voucher holder or MRVP voucher holder)

State law prohibits discrimination in advertising, public housing, and actions taken by realtors, landlords, mortgage lenders and brokers.

[M.G.L. c. 111, s. 199A](#) prohibits landlords from discriminating against families with children under the age of six because a unit does or may contain lead paint. Landlords have an

---

obligation to abate lead hazards if a child under the age of six lives in a unit. Landlords may not reject a family to avoid their obligations under the lead paint laws.

Both the Massachusetts Commission Against Discrimination and the Boston Fair Housing Commission are authorized to act on complaints of housing discrimination arising under Chapter 151B and Title VIII. The Boston Fair Housing Commission has its own ordinance covering many of the protected categories included under federal and state fair housing law. The BFHC has Home Rule. The BFHC Home Rule petition updated the enabling legislation for the BFHC, rendering it consistent with current state and federal housing discrimination laws. The law ensures that any additional protected classes that may be added to state or federal law in the future will fall under BFHC's enforcement authority.

**V.E.3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.**

*For question (3), list the agencies and organizations that provide fair housing information in the jurisdiction and region. Include a description of their capacity and resources available to them.*

Fair Housing information is provided by a number of local HUD funded Fair Housing Initiative Programs FHIP, and Fair Housing Assistance programs, FHAP agencies.

The City of Boston's Office of Fair Housing and Equity, Boston Fair Housing Commission is a HUD funded FHAP. The office expands access to equitable housing opportunities through investigations of housing discrimination, enforcement, public education, oversight of the Affirmative Marketing Program and fair housing policy consultation to City of Boston departments. <https://www.boston.gov/departments/fair-housing-and-equity>

The Fair Housing Center of Greater Boston is a HUD funded FHIP program that provides housing discrimination testing, policy advocacy, and advocacy to complainants in court and FHAP agencies throughout the greater Boston region.<sup>18</sup>  
<http://www.bostonfairhousing.org/>

Suffolk University Law School Housing Discrimination and Testing Program, HDTP is a HUD funded FHIP program. The HDTP is funded by a grant from HUD to work in partnership with the BFHC to eliminate housing discrimination in the Boston metro area through testing, enforcement, and education.<sup>19</sup> The HDTP recently released *Transcending Prejudice: Gender Identity and Expression-Based Discrimination in the Metro Boston Rental Housing Market*. The

---

<sup>18</sup> Fair Housing Center of Greater Boston. (2017, August 3) Retrieved from <http://www.bostonfairhousing.org/>

<sup>19</sup> Suffolk University Law School, Housing Discrimination Testing Program. ((2017, August 3) Retrieved from <http://www.suffolk.edu/law/academics/59759.php>

---

study uncovered significant housing discrimination against transgender and gender nonconforming people<sup>20</sup> <http://www.suffolk.edu/law/academics/59759.php>

The MCAD is an independent agency of the Commonwealth, which is funded by HUD, the U.S. Equal Employment Opportunity Commission (EEOC), the Commonwealth of Massachusetts, and other earned revenue. The MCAD investigates discrimination statewide under the following categories: Employment, Housing, Credit, public accommodations, and education.

<sup>21</sup> <http://www.mass.gov/mcad/about/>

The Cambridge Human Rights Commission (CHRC) enforces two ordinances: the Cambridge Human Rights Ordinance, chapter 2.76 and the Cambridge Fair Housing Ordinance, chapter 14.04. The Commission is a city law enforcement agency that investigates and adjudicate complaints of discrimination in the areas of employment, housing, public accommodation and education. Additionally, the Commission aids the City of Cambridge by educating both businesses and residents, providing community outreach, and cooperating with other city, state and federal agencies. The Commission is available to conduct workshop presentations on fair housing and employment discrimination for community groups, social service agencies, and schools.<sup>22</sup> <https://www.cambridgema.gov/Departments/humanrightscommission>

### **Non FHIP/FHAP agencies, this is not an exclusive list**

There are also a number of agencies that provide legal support and or advocacy services for low income people who are facing eviction, development of increased affordable rental/home ownership, and intervening in foreclosures.

Greater Boston Legal Services (GBLS) provides free legal assistance and representation on civil (noncriminal) matters to hundreds of the neediest residents in the city of Boston and 31 surrounding cities and towns.<sup>23</sup> <https://www.gbls.org/>

The Disability Law Center (DLC) of Massachusetts is the Protection and Advocacy agency for Massachusetts. DLC is a private, non-profit organization responsible for providing protection and advocacy for the rights of Massachusetts residents with disabilities. DLC receives federal, state and private funding but is not part of the state or federal government.<sup>24</sup> <http://www.dlc-ma.org/>

---

<sup>20</sup> Langowski, J., Berman, W., Holloway, R., McGinn, C. *Transcending Prejudice: Gender Identity- Based Discrimination in the Boston Rental Housing Market*. Suffolk University Law School Housing Discrimination Testing Program, Nov. 2016 [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2941810](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2941810)

<sup>21</sup> Massachusetts Commission Against Discrimination. (2017, August 3) Retrieved from <http://www.mass.gov/mcad/>

<sup>22</sup> City of Cambridge, Human Rights Commission. (2017, August 3) Retrieved from <https://www.cambridgema.gov/Departments/humanrightscommission>

<sup>23</sup> Greater Boston Legal Services. (2017, August 3) Retrieved from <https://www.gbls.org/>

<sup>24</sup> The Disability Law Center of Massachusetts. (2017, August 3) Retrieved from <http://www.dlc-ma.org/>

---

Metropolitan Boston Housing Partnership, MBHP is a nonprofit dedicated to connecting the residents of Greater Boston with safe, decent homes they can afford. MBHP empowers families and individuals to move along the continuum from homelessness to housing stability. MBPH serves more than 20,000 households annually, and working seamlessly to bridge the gaps among government, nonprofits, and corporations to continually increase impact.<sup>25</sup>

While there are local sources for filing housing discrimination complaints and advocacy, there is consensus that the demand for these kinds of programs generally outpaces the capacity and funding received by any one of these organizations. There is considerable demand for free and or low cost legal advocacy services for the majority of pro se complainants that FHAP agencies see. Since the burden of evidence is on the complainant and FHAPs are neutral agencies, there is also agreement that increased capacity at legal advocacy services could increase the amount of charges issued by FHAP agencies.

Administrative enforcement of housing discrimination laws in Boston is the responsibility of a number of agencies: the Office of Fair Housing and Equal Opportunity of the U.S. Department of Housing and Urban Development (FHEO), the Massachusetts Commission Against Discrimination (MCAD), the Office of Fair Housing and Equity's Boston Fair Housing Commission (BFHC) and the Cambridge Human Rights Commission (CHRC). The jurisdiction of these offices is overlapping but not identical, and depends on the authority delegated by the underlying laws, the classes of people protected by each law, and the size or type of the housing involved in a complaint of discrimination.

#### V.E.4. Additional Information

##### V.E.4.a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The BFHC collaborates with all the FHIP and FHAP partners who serve Boston and the greater Boston area through fair housing educational activities, conferences, trainings, and monthly/quarterly meetings sharing fair housing trends, best practices and discussing other fair housing relevant issues. The BFHC advocates on behalf of the Mayor's office at the state house on legislative priorities that have a fair housing impact.

#### 162 - An Act Relative to Promoting Fair Housing Practices

<https://malegislature.gov/Bills/190/H139> currently, formalized training in fair housing laws is optional for real estate agent/broker pre-licensing in Massachusetts. H.162 would mandate this training so that real estate professionals who rent, sell or buy property fully understand and are in compliance with these laws. This will help to ensure that tenant and prospective tenants' rights to non-discriminatory treatment are protected and ensure that clients purchasing homes as rental income properties understand their legal obligations. H.162 proposes 1 hour of mandatory fair housing education during pre-licensing and 1 hour of fair housing education

<sup>25</sup> Metropolitan Boston Housing Partnership. (2017, August 3) Retrieved from <http://mbhph.org/>

during each subsequent 2-year continuing education cycle for real estate brokers and agents. Requiring fair housing training for pre-licensing and continuing education will increase awareness of fair housing laws and contribute to a reduction in incidents of housing discrimination.

2. H. 1626 Act relative to lead abatement <https://malegislature.gov/Bills/190/H1626> This act proposes to:

- Lower the threshold for interventions from 25 micrograms per deciliter to 10 micrograms.
- Double tax credits for property owners who de-lead their housing units and increases the penalties for housing discrimination.
- Adds a \$50 surcharge to housing related businesses upon renewal of their licensure.

The BFHC has partnered with Suffolk University Law School Housing Discrimination Testing Program (SULS HDTP) since 2012 to test for housing discrimination in federal and Massachusetts protected classes.

In December of 2013, the HDTP published *Lingering Lead: Strategies for Eliminating Familial Status due to Lead Paint*.<sup>26</sup> The HDTP found that section 8 discrimination (receipt of public assistance), is highly correlated with the presence of Lead Paint and familial status discrimination. Receipt of public assistance is protected under Massachusetts state fair housing laws. [M.G.L. c. 151B](#) The BFHC and the HDTP received a partnership grant from HUD Fair Housing and Equal Opportunity, March 2014-August 2016. Some of the deliverables for the partnership grant were:

- Test for federal and Massachusetts protected class housing discrimination complaints, test for systemic discrimination, and write reports on findings.
- Increase community outreach and education among BFHC and HDTP on fair housing and all protected classes
- Convene a multi-agency and multi-disciplinary lead paint work group
- Produce a lead paint study outlining recommendations for addressing familial status and source of income discrimination related to lead paint.
- In 2015, the HDTP offered a Fair Housing Law course at SULS that included federal and Massachusetts protected classes
- HDTP provided fair housing trainings for SULS students

In November 2016, as part of the above partnership grant deliverables, the HDTP completed a gender identity discrimination study for the Boston Metro area. The study sites Federal Bureau of Investigations hate crime statistics confirming transgender and gender nonconforming people are the most vulnerable to prejudice and discrimination in the United States. The study's key finding was, "When comparing the treatment of individual pairs of transgender and/or gender non-

---

<sup>26</sup> Berman, W., Langowski, J., and Urbanowski, S. *Lingering Lead: Strategies for Eliminating Familial Status due to Lead Paint*. Suffolk University Law School Housing Discrimination Testing Program, Dec. 2013.



conforming people versus cisgender and gender- conforming people, the HDTP found discrimination in the form of disparate treatment in over 60% of the tests.”<sup>27</sup>

From June 2016-May 2017, the BFHC received a HUD FHEO Enhanced Education and Outreach grant to increase public education and awareness efforts of familial status discrimination. BFHC proposed to increase public education of protected class discrimination associated with lead paint through public billboards. Over 90% of BFHC intakes and discrimination cases are derived from BFHC education and outreach efforts. To achieve maximum impact, these billboards were posted throughout high risk neighborhoods in locations that receive a high concentration of both pedestrian foot and vehicle traffic. Neighborhoods deemed high risk had high concentrations of families with children and older housing stock more likely to contain lead paint. The billboards were placed in multiple neighborhoods in English, Spanish, and Vietnamese.

While there are many local sources for education, outreach, and advocacy, there is consensus that the demand for these kinds of programs far outpaces the capacity and funding received by any one of these organizations.

The MCAD provides mandatory housing discrimination training for charges and settlements. They also provide community trainings and presentation throughout the state. The MCAD offers four MCAD-certified courses for individuals who currently provide, or seek to provide, employment discrimination prevention training, conduct internal discrimination complaint investigations, and/or respond to accommodation requests.<sup>28</sup>

The Cambridge Human Rights Commission recently created a website to raise awareness about familial status discrimination associated with lead paint in Cambridge.

<sup>29</sup> [www.cambridgema.gov/leadpaint](http://www.cambridgema.gov/leadpaint) Cambridge has also held annual fair housing art contests, Affordable and fair housing events, and organizes the Commission on Immigrants Rights and Citizenship.

---

<sup>27</sup> Langowski, J., Berman, W., Holloway, R., McGinn, C. *Transcending Prejudice: Gender Identity- Based Discrimination in the Boston Rental Housing Market*. Suffolk University Law School Housing Discrimination Testing Program, Nov. 2016

<sup>28</sup> Massachusetts Commission Against Discrimination. (2017, August 3) Retrieved from <http://www.mass.gov/mcad/>

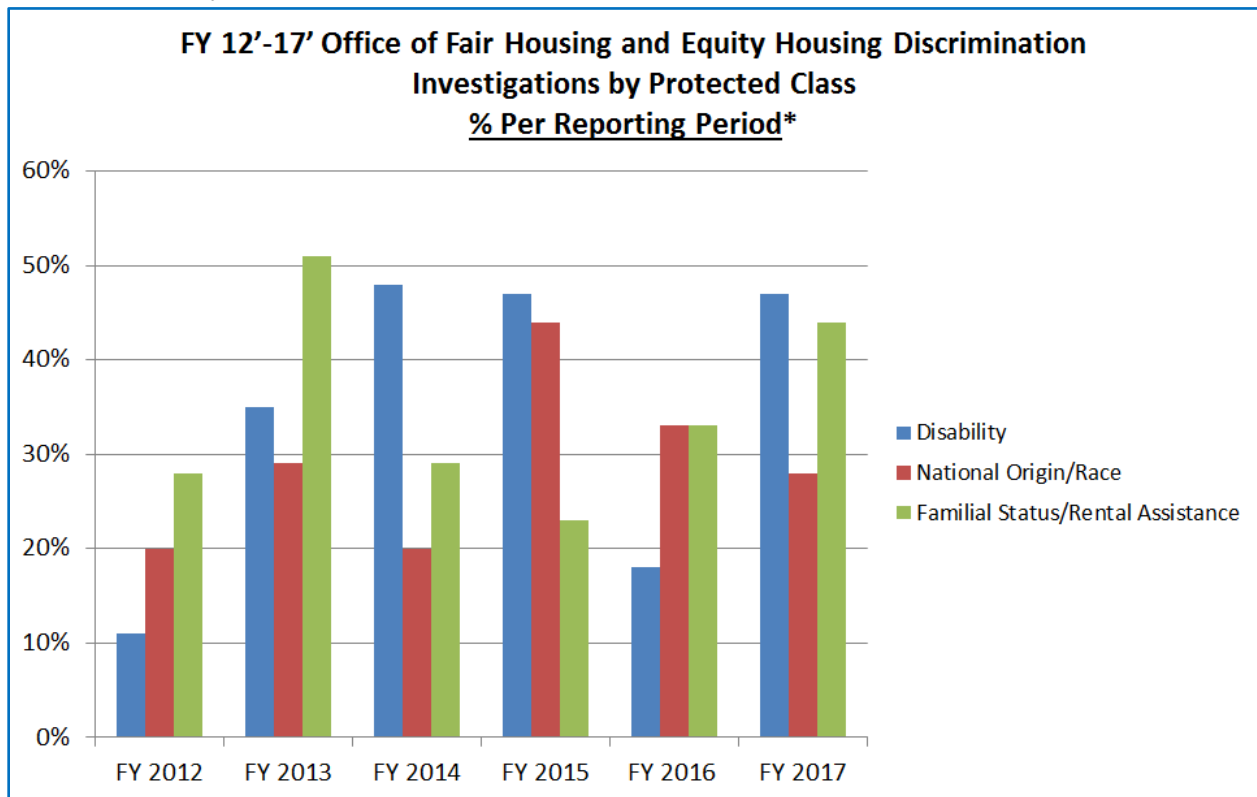
<sup>29</sup> City of Cambridge, Human Rights Commission. (2017, August 3) Retrieved from [www.cambridgema.gov/leadpaint](http://www.cambridgema.gov/leadpaint)

---

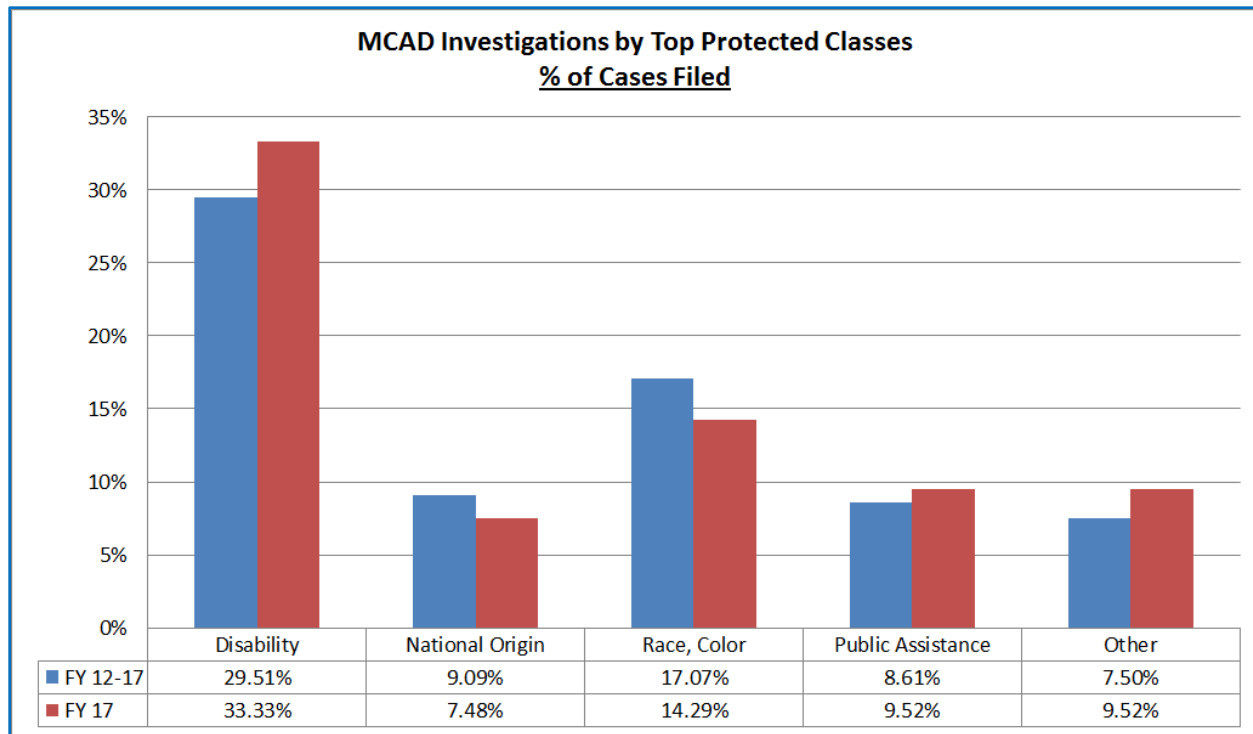


V.E.4.b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The BFHC is currently working on increasing our engagement capacity by focusing our engagement efforts on communities most likely to experience housing and other forms of discrimination. The BFHC most common categories for allegations are on par with national trends. However, in 2016 race and national origin were 67% of the BFHC caseload. To date for 2017, race and national origin is 36% of the open cases. The BFHC contributes this increase to a national context of increased racism, xenophobia, and anti-immigrant sentiment. This has increased mistrust of government and there is consensus among FHIP/FHAP agencies that we are seeing very little complaints compared to the anecdotal information we are hearing from the larger housing advocacy community. The BFHC is working on developing long term relationship with agencies who serve the Muslim community as this group has experienced increased hate crimes nationally.



Data provided by the MCAD shows that their top category for protected class complaints is disability 29.51% from 2012 to 2017. This is consistent with national fair housing complaints. When national origin and race are combined, it accounts for 26% of MCAD complaints from 2012-2017 and accounts for the other top two complaint categories after disability.

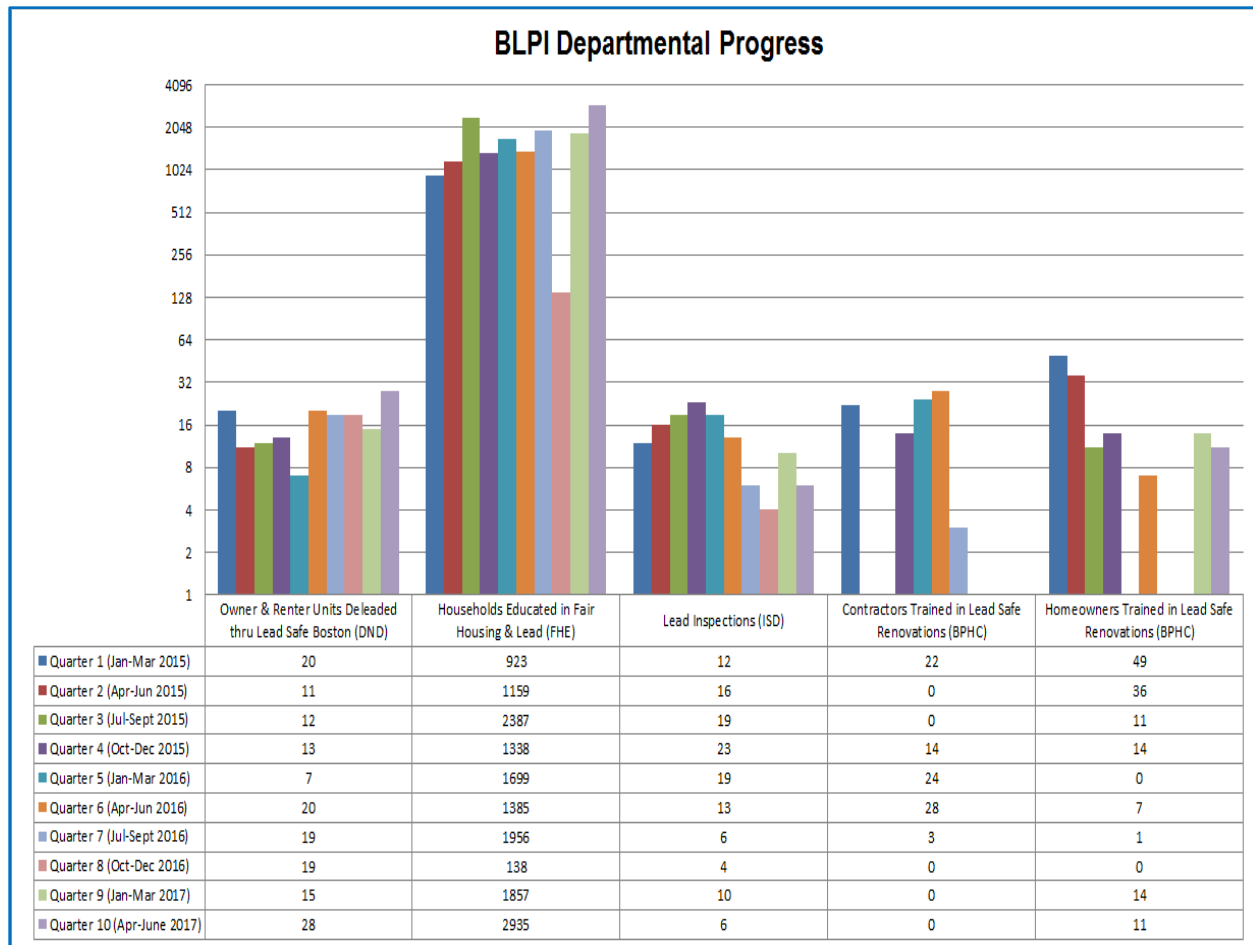


In an effort to create healthier homes for the children and families of Boston, Mayor Martin J. Walsh launched the *Boston Lead Paint Initiative* in October of 2014 with two main goals:

- Reduce the number of children exposed to lead paint and the number of families victimized by housing discrimination related to lead paint, and
- Increase the number of lead safe units and renovations through public education about lead and lead-related resources

The *Boston Lead Paint Initiative* is a multi-city agency collaboration that protects children and families from the dangerous effects of lead exposure and housing discrimination. Each City Department established the following five year goals in 2014:

- Department of Neighborhood Development (DND) Lead Safe Boston will "de-lead" 400 housing units (80/year).
- Office of Fair Housing and Equity (FHE) will educate 2,500 at risk residents on fair housing and lead awareness (500/year)
- Inspectional Services Department (ISD) will conduct 325 lead determinations in high risk units (65/year)
- Boston Public Health Commission (BPHC) will train and license 500 contractors in lead safe renovation (100/year).



#### V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

*For question (5), consider the list of factors provided, which are those most commonly associated with fair housing enforcement, outreach capacity, and resources, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to fair housing enforcement, outreach capacity, and resources.*

- X Lack of local private fair housing outreach and enforcement
- X Lack of local public fair housing enforcement
- X Lack of resources for fair housing agencies and organizations
- X Lack of state or local fair housing laws
- X Unresolved violations of fair housing or civil rights law

#### V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors – Other

- X Lack of trust of government programs
- X Increased national racism, anti-immigrant sentiment, xenophobia, and other protected classes being targeted by hate.