

**DRAFT METROPOLITAN
WASHINGTON REGIONAL
FAIR HOUSING PLAN**

DISTRICT OF COLUMBIA



January 2023

METROPOLITAN WASHINGTON REGIONAL FAIR HOUSING PLAN

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ABOUT COG

The Metropolitan Washington Council of Governments (COG) is an independent, nonprofit association that brings area leaders together to address major regional issues in the District of Columbia, suburban Maryland, and Northern Virginia. COG's membership is comprised of 300 elected officials from 24 local governments, the Maryland and Virginia state legislatures, and U.S. Congress.

PARTICIPATING LOCAL GOVERNMENTS

This fair housing plan was prepared in collaboration with eight COG member governments: City of Alexandria, VA; Arlington County, VA; District of Columbia; Fairfax County, VA; City of Gaithersburg, MD; Montgomery County, MD; Loudoun County, VA; and Prince William County, VA.

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Regionally-focused organizations which work with residents directly impacted by fair housing choice provided guidance to the local governments. The organizations included: Action in the Community Through Service (ACTS); CASA; Catholic Charities Archdiocese of Washington and Catholic Charities of Arlington; ENDependence Center of Northern Virginia; Equal Rights Center; Friendship Place; Greater Washington Urban League; House of Ruth; Legal Services of Northern Virginia; NAACP Chapters of Arlington County, Fairfax County, Montgomery County, and Prince William County; Offender Aid Restoration; Pathways Homes; and Washington Legal Clinic for the Homeless.

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I. Executive Summary

The executive summary is published as a separate document and can be found on the same web page as this document at www.mwcog.org/fairhousingplan. Hard copies are available upon request..

II. Community Participation

Meaningful community engagement is an important value in the development of the regional Analysis of Impediments to Fair Housing Choice (AI, or Regional Fair Housing Plan) for the metropolitan Washington region and the eight jurisdictions participating in the plan—the District of Columbia; the City of Alexandria, Arlington County, Fairfax County, Loudoun County, and Prince William County in Virginia; and the City of Gaithersburg and Montgomery County in Maryland.

Although there is no current US Department of Housing and Urban Development (HUD) rule or guidance on community engagement, the project team took its cues from the 2015 Affirmatively Furthering Fair Housing rule. Under this rule, community engagement means “a solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes.” The project team took seriously its role in ensuring that community voices inform the plan. These voices are important to help confirm data findings, identify gaps in information, or reshape biases or uninformed viewpoints.

The Regional Fair Housing Plan is an important step that should inform each grantee’s Consolidated Plan, which defines how communities will utilize HUD grant funds, specifically Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grants (ESG) monies. In principle, the Fair Housing Act of 1968, which calls for all federal programs to “affirmatively further fair housing,” should prioritize the use of limited HUD funding and resources for “protected classes” or individuals, groups, and communities that have been most impacted by past discriminatory practices that have affected resources and land patterns to this day. Enshrined in the Fair Housing Act, these protected classes encompass race, color, sex, national origin, religion, familial status, and disability.

The project team leaned on its experience in community engagement with over 20 AIs from across the country in a variety of geographies including large cities, urban counties, and suburban jurisdictions, such as Kansas City, Los Angeles County, Prince George’s County (Maryland), and Orange County (California). The project team was also advised by Jarrod Elwell of Enterprise Community Partners, who was assigned by HUD to provide best practices and guidance to the Council of Governments (COG) and the regional effort.

An important anchor in the work was the regional coordination for community engagement led by Hilary Chapman, housing program manager at the Metropolitan Washington COG. She coordinated meetings with the regional AI project team and the regional Fair Housing Community Advisory Committee as well as internally with COG communications staff. The regional AI project team included senior staff and housing directors from every jurisdiction, and the regional Fair Housing Community Advisory Committee was composed of a wide variety of community organizations representing HUD-defined protected classes, such as civil rights groups, disability advocates, advocates for housing for seniors and immigrant groups, and service organizations from throughout the region.

The regional AI project team met monthly, while the regional Fair Housing Community Advisory Committee met every other month. This is in addition to countless meetings with staff from each jurisdiction and various organization leaders who served on the committee.

Although limited in number due to the COVID-19 pandemic, public meetings were held in government facilities that were accessible and met the requirements of the Americans with Disabilities Act. The project team also tried to ensure that websites and virtual meetings met Section 508 requirements, endeavored to use descriptive language when making presentations, and provided Spanish interpreters. Every meeting invitation offered services for the visually and hearing impaired as well as interpretation in various additional languages through multilingual services contracted and offered by various jurisdictions.

As mentioned, one of the challenges of conducting community engagement was the COVID-19 pandemic. A handful of meetings and presentations were conducted in person in the fall of 2021 during a lull in the pandemic. For the most part, however, the meetings were held virtually using the Zoom application. The project team experimented with different days of the week and times of day to encourage as much participation as possible. The project team also grappled with “Zoom fatigue,” a real phenomenon and challenge because of the amount of time participants were spending on work calls as well as connecting with family, friends, and social groups, especially during the height of the pandemic. The project team worked closely with expert facilitators, who were able to adapt community engagement techniques for a virtual platform by adjusting presentations and using short videos, recorded testimonials, and breakout groups to allow as much audience participation as possible.

To guide the work, the project team developed a Regional Community Engagement Plan in May 2021 for review and comment by COG and the participating jurisdictions. This game plan laid out how the project team would seek information from community stakeholders to inform the Regional Fair Housing Plan. The Community Engagement Plan included the following elements: outreach events and marketing, a regionwide survey, regional meetings, local jurisdiction meetings, interviews, focus groups, and social media engagement. The following sections provide more detailed information on the various elements of the plan as well as findings from the survey, focus groups, and community meetings.

Outreach Events

The first step in community engagement was to inform as many stakeholders as possible that the Regional Fair Housing Plan process had begun. This involved outreach to local organizations, fair housing agencies, civil rights organizations, and service organizations that work with protected classes. In addition, the project team worked with each jurisdiction to conduct an internal awareness campaign inside its own local government to ensure that all related agencies were aware of the Regional Fair Housing Plan. This included social service, homeless service, planning and zoning, human relations, and human rights agencies, as well as area advisory boards or other officially constituted advisory boards from each jurisdiction, such as regional service centers in Montgomery County or magisterial districts in Prince William County.

The project team worked with each jurisdiction to prepare an outreach list and a Google calendar. Jurisdictional project leads worked closely with the project team to obtain invitations to regularly scheduled advisory board, city, or county meetings. We began to informally call these “familiarization tours” because in most cases, individuals or groups were not familiar with fair housing or a fair housing plan. Overall, it was helpful to present information on the Fair Housing Act, why the Fair Housing Act was created, and how the process would roll out. In this way, individuals were prepared to participate in future meetings or interviews as well as more willing to assist in sharing information about future meetings. Primarily from April to June 2021, the project team developed a list of over 1,235 agencies, organizations, and individuals interested in engaging more deeply in the Regional Fair Housing Plan

process. A list of all outreach meetings and events can be found in the Community Engagement Appendix.

Media Strategy

The project team coordinated with Housing Program Manager Hilary Chapman and COG's communication staff as well as each jurisdiction's COG project team leads. Each jurisdiction, in turn, helped to coordinate and communicate with its public information office.

The project team created event announcements and flyers that were sent out to interested individuals and organizations via MailChimp, but much larger outreach was done in coordination with COG's communications staff and each jurisdiction's public information office or internal departmental lists. Each jurisdiction has internal mailing lists that can reach thousands of citizens. Coordination was key to ensure messages were sent in a timely manner given that the project team depended on cooperation with each jurisdiction to reach as wide an audience as possible.

Each jurisdiction was also responsible for following its own internal requirements for posting public notices in newspapers of general circulation, posting on departmental websites, or posting messages on social media. This also included posting messages or announcements in multiple languages, including Arabic, Amharic, Spanish, and other languages spoken in each jurisdiction. The project team provided materials in Spanish and English for all flyers and major announcements, as required.

The project team worked with COG to create a social media tool kit that included sample tweets and Facebook posts encouraging participation in the Regional Fair Housing Plan as well as posts encouraging participation in the regional survey. A sampling of the contents from COG's Social Media Tool Kit can be found in the Community Engagement Appendix.

The project team also worked with COG's communications team to create an easy-to-find project web page at www.mwcog.org/fairhousing that includes information about the draft Fair Housing Plan, upcoming events, and a short eight-minute presentation on the Regional Fair Housing Plan. Members of COG's board and elected leaders from throughout the region recorded a short video¹—a call to action—encouraging participation in the process.

Regional Focus Groups

As part of its community engagement strategy, regionalism is an important theme of the Regional Fair Housing Plan. Understanding that housing affordability, the need for units accessible to persons with disabilities, and discrimination in housing, among other issues, don't stop at jurisdictional lines, the community engagement plan included regional focus groups. To that end, the project team wanted to engage with residents from across the region to share barriers to affordable housing and talk about equity and discrimination in housing. The project team partnered with Challenging Racism, a nonprofit organization headquartered in Arlington, Virginia, with a mission to "educate people about the prevalence and inequities of institutional and systemic racism, giving them knowledge and tools they need to challenge racism where they encounter it."

Challenging Racism helped the project team design an interactive session that combined education and dialogues at the intersection of housing, transportation, education, environment, and race. Each session was two and a half hours long and included educational sessions on redlining in the Washington region and some background on the federal government's role in housing inequality based on Richard Rothstein's book *The Color of Law*. The format included presentations by storytellers from a variety of backgrounds and small group discussions. The sessions were held on Thursday, July 14; Friday, July 22; and Sunday, July 31, at different times, to attract as diverse an audience of possible.

Local jurisdictions also played an important role in promoting this event. Due to the COVID-19 pandemic, all sessions were hosted online on Zoom. These sessions attracted over 388 registrants.

Survey

From July 2021 to February 2022, the project team conducted a survey of residents from throughout the Washington region, targeting the eight jurisdictions that are part of the Regional Fair Housing Plan. The project team used Alchemer, an online survey tool, to easily reach residents, advocates, and organizations. The survey was simplified by plain language experts provided by the government of the District of Columbia to achieve a more readable format for the general public and thereby increase the response rate. The survey was also translated and distributed in Spanish.

A soft launch of the survey was first included as part of the post-meeting materials of the Challenging Racism regional workshops. The project team worked with Metropolitan Washington COG and the eight jurisdictions to post the survey on COG's fair housing web page as well as each jurisdiction's departmental website. The project team also posted the survey and sent it with follow-up emails after each focus group meeting. Initial survey responses were low given that participants were being asked to complete a survey after having just participated in an hour and a half-long meeting. A more concerted campaign was made in the fall of 2021 and the spring of 2022 using social media. The project team developed a social media tool kit that included information and messages about the survey for each jurisdiction. The joint effort greatly increased the response rate, rapidly increasing the number of participants. All told, 2,825 surveys were collected from the eight jurisdictions.

Some of the top findings include these:

- Safe, affordable housing in acceptable condition is difficult to find, according to 83.6 percent of respondents. The top three reasons given were that the respondent didn't earn enough money (58.9 percent), the housing available was in bad condition or unsafe (30.5 percent), and the respondent was not able to save for a security deposit or down payment (29.9 percent). Other reasons included that the respondent had too much debt, mortgage interest or fees were too expensive, and the homebuying process was too confusing or complicated.
- About 13 percent of respondents reported that they personally had faced discrimination, and an additional 3.6 percent reported that not only had they experienced discrimination but they also knew someone else who had experienced discrimination. An additional 9.2 percent reported that they personally had not experienced discrimination but knew someone who had.
- The top three reasons reported for discrimination were income level, race or ethnicity, or source of income.
- Of the respondents who reported discrimination, 41.3 percent said the landlord or property manager was the perpetrator.
- Almost 75 percent of survey respondents did not report their discrimination complaint. The primary reasons respondents did not report discrimination were that they did not believe it would make a difference (39 percent) or that it was too much of a hassle (11 percent), but about 17 percent did not know how to report a case.

The following is a profile of the survey participants:

- The jurisdictions with the most respondents were the District of Columbia (57.2 percent), Loudoun County (16.2 percent), and the City of Alexandria (8.2 percent).
- The participants primarily worked in the District of Columbia (59.3 percent), Loudoun County (12.4 percent), and Fairfax County (11.7 percent).
- Almost half (47.4 percent) of respondents lived in multifamily buildings, evenly split between small buildings (with fewer than 20 units) and larger buildings (with 20 or more units).
- Those who lived in single-family dwellings were 18.1 percent of respondents.

- Homeless or unsheltered people were 4.2 percent of respondents.
- Of all respondents, 18.7 percent paid a mortgage, while 60.1 percent paid rent, with 33.4 percent of rent payers paying rent to a private landlord.
- Racially, 58.7 percent of respondents identified as Black or African American, 26.1 percent as White, 6.4 percent as multiracial, and 8.8 percent as Hispanic or Latino.

The survey results were a useful tool for comparing housing barriers and potential goals and actions collected from focus groups and public meetings. But the survey also served as another form of outreach by collecting data from interested members of the public who did not have time to participate in a public meeting. A complete summary of the survey results is available in the Community Engagement Appendix.

Jurisdictional Focus Groups and Public Meetings

In the fourth quarter of 2021, the project team conducted a focus group and a public meeting for each jurisdiction, reaching over 700 participants. The participating jurisdictions included the District of Columbia; Arlington, Fairfax, Loudoun, and Prince William Counties and the City of Alexandria in Virginia; and (in a joint meeting) the City of Gaithersburg and Montgomery County in Maryland. Meetings were scheduled from October to early December to accommodate each jurisdiction's existing schedule of events and previously scheduled public meetings.

Extensive consultation and outreach were conducted with each jurisdiction to develop a list of stakeholders for a smaller focus group of approximately 30 participants in addition to a larger meeting open to the public. The project team sent individual invitations via MailChimp and sent follow-up emails and made phone calls. The project team worked closely with jurisdictional liaisons to do outreach, develop the agenda, and create the presentations.

Each meeting included an overview of the fair housing process, preliminary data findings for each jurisdiction from the Urban Institute, short presentations on related housing studies by each jurisdiction, and breakouts for small group discussion. For the smaller focus groups, the project team utilized a Jamboard, a virtual whiteboard on Google, that allowed participants to share barriers and solutions to housing on virtual sticky notes. The small group discussion provided rich and valuable information that helped the project team better understand the barriers that renters, homeowners, and the unhoused face across the region.

The notes and Jamboard were analyzed by Lorraine Hopkins, Tayanna Teel, and Aaron Turner, a team of graduate students in the Masters of Public Administration and Policy program in the School of Public Administration at American University. The students used NVivo, word analysis software that helps social scientists look for patterns and commonalities. This analysis was helpful in summarizing all 14 meetings across the region.

The NVivo study found the following problems to be the top 10 barriers to fair housing in the region, in rank order:

1. lack of affordability
2. government failure (government inability to address the issue)
3. racial discrimination
4. lack of housing stock
5. lack of Americans with Disabilities Act (ADA) accessibility, including not enough housing for persons with disabilities or seniors, discrimination against persons with a disability, and noncompliance with existing laws and regulations
6. system navigation difficulties (program requirements, waiting lists, etc.)
7. subtle practices that support segregated housing and neighborhoods

8. bad landlords or property managers
9. lack of awareness of fair housing rights
10. planning and zoning regulations

These were the top 10 solutions identified in the meetings:

1. more programs and staff with culture and language competency
2. creation of accessible housing for persons with disabilities
3. creation of accessible housing grants
4. improved building code, zoning, and planning regulations
5. more navigation support (i.e., housing counseling)
6. better-trained real estate professionals
7. more rental assistance programs that are easier to navigate
8. materials in multiple languages, including plain language
9. programs for returning citizens (those formerly incarcerated)
10. greater tenant rights

Interviews

After considering the findings of the jurisdictional focus groups and public meetings, the project team consulted with each jurisdiction's project team to develop a list of 8–10 key people to interview in each jurisdiction. The project team conducted 36 interviews in January, February, and early March. In several cases, the interviews included a small group of elected or senior officials. Overall, the project team interviewed approximately 50 individuals. The interviews also provided the project team the opportunity to discuss recent housing needs studies and fair housing plans. For example, both the District of Columbia and Arlington County already had draft AIs.

The interviews included a number of influential stakeholders and decisionmakers:

- fair housing and civil rights organizations, including each jurisdiction's civil rights, fair housing, or human relations agency, such as the NAACP
- private housing industry stakeholders (e.g., developers, lenders, Realtors, mortgage companies, real estate brokers, insurance companies, home inspectors, appraisers, management companies, etc., and their trade groups, such as the Northern Virginia Board of Realtors)
- senior officials from offices and agencies of housing and community development, public housing authorities, and social services agencies
- planning directors and staff with oversight of land use and zoning
- elected government officials—city council members or county commissioners
- nonprofit leaders (from, e.g., community-based organizations, community development corporations, housing counseling groups, legal services agencies, immigrant rights advocacy groups)

These interviews took place in addition to dozens of informal conversations with area leaders in the civil rights, housing, and community development fields. For a full list of interviews, see the Community Engagement Appendix.

Topical Focus Groups

Although the project team was pleased with the participation in the jurisdictional focus groups and public meetings, there were gaps noted in certain groups representative of the protected classes in the Fair Housing Act. Despite outreach attempts, representatives of certain groups were not able to attend the meetings at the scheduled times due to conflicts or other demands. To remediate these gaps, the project team analyzed for missing groups and consulted the jurisdictional liaisons and the regional Fair Housing Community Advisory Committee.

The project team found that more information was needed from representatives of Spanish-speaking and immigrant communities, the LGBTQ+ community, seniors, and persons with disabilities. Beginning in January 2022, targeted outreach was provided to representative organizations to schedule focus groups for convenient days and times during the month of March. Over 100 participants participated in five meetings. Although the meetings included short presentations, they were meant to be small to encourage conversation and exchange rather than adherence to a tightly scripted agenda.

Here are some selected top barriers and solutions identified in each topical focus group:

Spanish-Speaking Community

- need for more Spanish-speaking housing counselors as well as local government staff
- multiple issues with housing conditions and code enforcement
- fear of reprisal as a major issue in reporting housing discrimination or substandard housing conditions
- need for more outreach and education on fair housing rights

Immigrant Communities

- not enough program information available in languages such as Amharic, Arabic, Chinese, and others
- lack of familiarity with local government housing programs
- many cases of source-of-income discrimination
- lack of affordability as the biggest obstacle to homeownership
- subtle forms of discrimination due to religion, national origin, and language that are hard to prove; need for more fair housing testing

Seniors

- few options and programs for seniors to remain in place
- limited number of affordable rental housing choices for seniors
- need for more options for multigenerational dwellings
- need for more housing for seniors who also have a disability
- need for more housing counseling for seniors, especially for foreclosure prevention and reverse mortgage fraud

Persons with Disabilities

- landlords often not abiding by reasonable accommodation regulations
- low-income persons with disabilities facing limited choices because of credit, deposit, and other requirements
- not enough fair housing testing for persons with disabilities
- need for access to affordable professionals who can make necessary modifications
- need for more universal design standards in all buildings, across the board

LGBTQ+ Community

- LGBTQ+ youth facing additional challenges because of limited programs and services, leading to higher incidence of homeless youth
- need for more LGBTQ+ fair housing testing
- need for better cross-jurisdiction coordination of services for LGBTQ+ youth; many jurisdictions sending youth to D.C.
- greater need to address housing needs for senior LGBTQ+ individuals

Public Comment

In January 2023, the draft plan was published on COG's and each jurisdiction's website for a 60-day public comment period. Each jurisdiction was responsible for posting a message notifying the public. The project team prepared a flyer for circulation by each jurisdiction and also sent a message to the project team's internal mailing list. Public comments were collected through COG's fair housing project page (by email to fairhousing@mwkog.org) as well as each jurisdiction's general project mailbox, depending on the agency responsible for the jurisdiction's fair housing plan.

Conclusion

Community engagement requires not just one format or type of outreach and input but multiple modes to reach different groups. People are challenged not just by work and family pressures but by multiple public meetings and surveys, compounded by the COVID-19 pandemic. The project team understood that a survey might be the only input provided by an interested member of the public. Outreach requires careful planning and multiple channels and reminders, but most important of all is the invitation from a colleague or friend that makes a difference on whether someone may or may not attend a public meeting.

As the project team has had some time to reflect on all of our outreach efforts, some takeaways from the Regional Fair Housing community engagement plan include the following:

1. Public engagement officers should be included from the planning stages and throughout the effort. Their mailing list and social media reach is much larger than what the program team could ever muster.
2. Finding community engagement champions among stakeholder groups is key to get more citizen voices involved. Community leaders have more credibility than the project team could ever have on the neighborhood or local level.
3. A multilingual effort is necessary but requires more investment and time from local government agencies as a consistent effort throughout the entire process.
4. Funding outreach efforts by community-based organizations led by Latinos, immigrants, the disability community, seniors, and LGBTQ+ individuals could result in better turnout for community engagement efforts.
5. Getting eight local governments to agree on a multipronged approach takes a lot of compromise and effort, but the results are worthwhile.

Our efforts were successful primarily because of the coordinated efforts of the Metropolitan Washington COG, jurisdictional liaisons, housing directors, and the project team working together in concert with the many advisors, colleagues, and friends in the housing and community development field that kept pushing the ball forward.

Now that all the information is gathered and the draft plan has been reviewed and adopted by each jurisdiction, the next step is for senior officials and elected officials to implement the goals and recommendations so that the Regional Fair Housing Plan becomes action rather than just words. Some progress will be rapid, building upon the many existing efforts across the region, and some may be incremental and take more time. Ultimately, it will also take a dedicated public staying engaged and continued advocacy efforts by stakeholders to keep track of progress not just over a year but for the next several years to come.

III. Assessment of Past Goals

District of Columbia (D.C.)

1. Reduce disproportionate housing cost burden for members of protected classes.
 - a. Amend the District's Inclusionary Zoning (IZ) Program through a package of incentives and requirements that would result in nearly all developers' setting aside 20 percent or more of a property's square footage as affordable.
 - b. Dedicate funding to enable nonprofit affordable housing developers to purchase units produced through the District's IZ Program and rent those units to households with incomes at or below 30 percent of the area median income (AMI).
 - c. Broaden rent control protections.
2. Ensure access to safe and habitable homes.
 - a. Fully fund critical repairs to D.C. Housing Authority (DCHA) properties.
 - b. Target proactive, objective, and transparent inspection activity toward areas for housing code violations.
3. Increase access to opportunity for residents.
 - a. Increase investment in the cleanup of contaminated sites.
 - b. Incorporate an environmental justice analysis into the review of zoning and permitting applications that would result in new land uses that might result in environmental burdens.
 - c. Heighten IZ requirements within close proximity to Metrorail stations.
4. Increase community integration for persons with disabilities.
 - a. Implement allowable rent standards based on the DCHA's payment standards for all tenant-based rental assistance programs.
 - b. Provide funding for accessibility retrofits in community residential facilities.
5. Promote housing choice, and redress segregation and exclusion.
 - a. Expand affirmative marketing requirements and resources for housing mobility counseling services.
 - b. Implement the Mayor's Housing Plan so as to ensure meaningful new housing options, including options for low-income families.
 - c. Address exclusionary impacts of zoning and planning policies.
 - d. Incorporate a cross-agency fair housing and equity analysis into the review of public housing redevelopment plans and planned unit developments.
6. Increase access to proficient schools, and disrupt the cycle of residential and school segregation.
 - a. Ensure that families with housing assistance have access to high-performing schools.
 - b. Explore revisions to school assignment boundaries and feeder patterns to avoid reinforcing segregation.
 - c. Explore revisions to the lottery system to avoid reinforcing segregation.
 - d. Protect students from school displacement.
 - e. Address the lack of student transportation services.
 - f. Improve school ranking systems to avoid reinforcing segregation.
7. Expand outreach and education around fair housing rights and resources.
 - a. Expand fair housing outreach and education.
 - b. Increase fair housing enforcement.

2021 CAPER FAIR HOUSING ANALYSIS OF IMPEDIMENTS (AI) UPDATE

In recent years, D.C. has meaningfully implemented changes that respond to the 2011 Analysis of Impediments to Fair Housing Choice that was completed through the Department of Housing and Community Development (DHCD). Changes to policy, funding, and regulation seek to promote housing choice and racially and economically integrated neighborhoods and accommodate a diverse

population of individuals and families in light of D.C.'s changing demographics. As Mayor Muriel Bowser often states, whether your family has been here five minutes or five generations, there should be housing opportunities for you in D.C.

An updated AI was completed in late 2019 and utilizes the Assessment to Fair Housing format. DHCD engaged the Lawyers Committee for Civil Rights Under Law (an organization founded by former Attorney General Robert Kennedy) and the Poverty & Race Research Action Council. During the development of the document, DHCD and the contractors engaged in outreach with the community and stakeholders to obtain qualitative (stakeholder feedback and interviews) data and the required quantitative data analysis. As part of the needs-assessment process for the development of the 2020 action plan, DHCD reserved time for the discussion of the AI: contractors led a discussion and presented on the AI process. In addition, a fair housing survey was conducted at the 11th Annual Housing Expo as part of the public engagement process. A draft document presented by the District contractors was released for public comment on September 28, 2019. DHCD engaged in four hearings to get feedback from the community on the draft document. The District incorporated the comments into the document.

What follows is a restatement of each impediment to fair housing outlined in the 2011 AI and a summary of how the District has responded to overcoming that impediment.

Impediment 1: The entrenched dual housing market within and around D.C. is responsible for the levels of housing segregation in both the District and the counties that surround it. There is one housing market for African Americans and another for everybody else. The result is a highly segregated D.C. where one-third of the District's 39 neighborhood clusters are 93 percent or more African American and just 3 clusters have proportions of Caucasians and African Americans close to what would be expected in a free housing market lacking discrimination. Due to the extreme difference in the median incomes of the District's White and Black households, this racial segregation is accompanied by economic segregation.

In 2017 and 2019, DHCD revisited its Qualified Allocation Plan and revamped its consolidated request for proposals to use the District's federal and local affordable housing funds to reduce historical patterns of segregation and mitigate those that would emerge from changing the D.C. housing market. The Qualified Allocation Plan and request for proposals also removed points for a local elected official's support of projects.

Geographic targeting is used to select preferred projects in the request for proposals under the "Affirmatively Furthering Fair Housing/Geographic Targeting" and "Transit Proximity" priority scoring points. Using an index of housing costs (combining relative rents and home prices) and the presence of rail transit, DHCD seeks to incentivize proposals that produce or preserve affordable housing in high-opportunity neighborhoods, those with characteristics such as low crime, low poverty, and access to high-quality schools and jobs. The aim is to provide a counterbalance to the implicit incentive for developers to build affordable housing in low-cost and high-poverty neighborhoods and, as a consequence, enhance economic, racial, and ethnic diversity.

The District continues to support the enforcement of the Tenant Opportunity to Purchase Act and the acquisition and critical repair funds to advance housing opportunities and mitigate displacement. Furthermore, DHCD drafted final regulations for the District Opportunity to Purchase Act (DOPA) in fiscal year (FY) 2018 and implemented DOPA in 2019. The act requires rental property owners to provide the mayor with the opportunity to purchase housing accommodations consisting of five or more rental units as long as 25 percent or more of the rental units are "affordable." DOPA offers of sale should be submitted concurrently with, but are subordinate to, a tenant's right to purchase under

the Tenant Opportunity to Purchase Act. DOPA purchase opportunities are announced by DHCD, and developers who meet the criteria are invited to respond to those requests. The developers must comply with DOPA's requirements by maintaining and increasing the number of affordable units in the properties. Since implementing this law, DHCD has exercised its DOPA rights 15 times in order to preserve existing affordable housing.

Housing opportunity is also promoted through the Property Acquisition and Disposition Division at DHCD. The District can dispose of problematic or blighted properties, offering the development of affordable and workforce housing or other amenities that stabilize neighborhoods. This creates affordable housing and assisted homeownership, removes blight, and promotes greater economic development in at-risk neighborhoods. A similar process through the Office of the Deputy Mayor for Planning and Economic Development governs the disposition of other District-owned properties that results in multifamily properties of 10 units or more. If the multifamily units are located within a half-mile of a Metrorail station or Priority Corridor Network Metrobus Route, 30 percent of the units now are required to be affordable. If the property is outside these transportation opportunity areas, 20 percent are required to be affordable.

Increased economic, racial, and ethnic diversity is also being accomplished through the District's IZ program. This program has generated 989 affordable units since its inception. Since these units are in larger, new, market-rate developments, they are either in neighborhoods that are established as high-opportunity areas or in areas receiving investment and becoming higher-opportunity areas. With few exceptions, the units are allocated by a lottery open to all eligible applicants, further limiting the instances of steering and creaming of applicants in the program. In the rare instances wherein the lottery is not used, the developer must submit a fair housing marketing plan.

The District has made numerous improvements to its homeownership programs. The base amount of assistance for the lowest-income-eligible recipients has been increased to \$80,000, and repayments have been deferred for all but the highest-income recipients until the home is sold, refinanced, or no longer occupied by the recipient. An additional program administrator, the District Housing Finance Agency, and many process improvements have made a dramatic increase in the program's utilization, particularly increasing homeownership in the eastern wards of the District. In FY 2021, DHCD invested more than \$15.3 million dollars of federal funds, assisting 328 households through the Home Purchase Assistance Program and the Employer Assisted Housing Program.

Last, home seekers can find housing throughout the District, including accessible housing for persons with disabilities in the neighborhoods of their choice, by searching https://www.socialserve.com/tenant/DC/Search.html?city_id=51879&ch=DC or www.DCHousingSearch.org. The District's Affordable Housing Locator has been updated continuously since 2014, ensuring that private and nonprofit development partners include all of the available, affordable units on the site. Private-sector developers who are not in partnership with DHCD also are encouraged to list their affordable housing units.

contributed to much of the racial segregation in the District. The District's own fair housing law substantially expands the number of protected classes beyond the nation's Fair Housing Act. As recounted earlier, reported acts of housing discrimination likely represent only the tip of the proverbial iceberg.

The District's private, nonprofit, and public sectors have made strides in providing outreach and increasing awareness regarding diversity and cultural awareness in relationship to equal housing opportunity. For example, the Equal Rights Center (ERC), a civil rights, nonprofit advocacy organization, has dedicated training on fair housing for private-sector partners. ERC trains the housing industry in

equal-opportunity matters such as the fair housing responsibilities of multifamily owners as well as accessibility and source-of-income protections and provides online courses about fair housing protections and criminal record screening. The National Association of Realtors offers a curriculum on diversity for all members as continuing education. These efforts, combined with the enforcement actions of the Office of Human Rights (OHR) and federal agencies, assist in mitigating further discrimination in the metropolitan area.

To mitigate the evident racial and ethnic segregation described in the AI, ERC conducts paired testing in the metropolitan area. The purpose is to uncover unfair housing practices and provide an equal playing field for home seekers of all protected categories, regardless of their income status. In 2015, ERC conducted 464 fair housing tests and increased its corporate trainings (in the housing industry) by 7 percent over the previous year. It also partnered with OHR and 17 other organizations to engage residents and businesses in a daylong awareness campaign on disability issues. To increase awareness of housing issues in the LGBT elder community, ERC partnered with a national organization and published an informational tool kit for members of the LGBT elder community who face housing discrimination.

Housing is linked to cross-cutting civil rights issues such as transgender and gender equality, immigrant and language access, and accessibility for persons with disabilities. Since 2012, OHR has conducted media campaigns to educate the public on fair housing as a right, inform residents of language-access laws for limited-English-proficient District residents, promote respect for transgender and gender identity, publicize contributions by immigrants in creating a more diverse city, and encourage businesses and places of public accommodations to be more accessible to persons with disabilities.

More recent media campaigns have focused on gender equality for women and antidiscrimination in the Muslim community. OHR has hosted a TEDxMidAtlanticSalon talk on gender equality. These Employment and Public Accommodations campaigns have had the added result of bringing attention to the obstacles faced by residents within these groups when seeking housing opportunities. The relationship between employment and housing is symbiotic, and the lack of one diminishes opportunity in the other.

The District has used its long-running Annual Fair Housing Symposium, a partnership among DHCD, OHR, ERC, and the District Developmental Disabilities Council, as a mechanism to inform and educate residents, community-based service providers, industry professionals, and government agency personnel on incorporating and abiding by fair housing principles as a means to promote racial, ethnic, and economic diversity.

Impediment 3: Discrimination against African Americans and, to a lesser extent, Latinos in issuing conventional and Federal Housing Administration loans continues unabated in the District as it does throughout the nation.

The District Department of Insurance, Securities, and Banking (DISB) not only protects consumers by offering regulatory supervision of financial services companies, firms, and individuals doing business in the District but also has the directive to develop and improve market conditions to attract and retain financial services firms in the city, at times balancing conflicting interests and real consequences for the District residents.

Notwithstanding the lack of updated Home Mortgage Disclosure Act data to factor current mortgage lending discrimination, the District has moved forward in educating residents about their rights

regarding mortgage lending and insurance, how to avoid becoming victims of fraud, and how to file grievances.

The DISB Foreclosure Mediation Program, which began in May 2011, as a result of the Saving D.C. Homes from Foreclosure Amendment Act of 2010, has been very successful in reducing foreclosures: from 1,349 in 2010 to 114 in 2014. Other foreclosure prevention efforts are made available to District residents through the \$4.4 million District portion of the National Mortgage Settlement, which provides consumer relief to those effected by abusive mortgage loan servicing prior to the national mortgage reforms that were passed in 2012.

DISB partnered with a District community-based organization, Housing Counseling Services Inc., to provide legal aid to homeowners facing foreclosure, create a hotline for distressed homeowners, and provide help for residents in accessing money they are eligible for through the settlement. In addition, Housing Counseling Services Inc. launched a media campaign to inform residents of District resources and the Foreclosure Prevention Hotline. This campaign prevented many District residents from losing their homes, thus precluding residents' adding to the economic segregation prevalent in the District. Furthermore, DISB increased financial literacy for unbanked and underbanked residents who often rely on expensive check-cashing centers and payday lenders to become users of Bank on D.C. accounts from participating mainstream financial institutions. DISB continues to explore ways of decreasing "banking deserts," predominantly located in minority neighborhoods.

DISB engaged the community and the business sector to improve education on insurance and financial scams and foreclosures, and in 2013, DISB initiated two enforcement actions to protect District investors. These initiatives were focused on seniors: one against an investment company targeting seniors and a second against an individual selling fraudulent investments.

In 2014, DISB began using the National Mortgage Licensing System to manage all money-related transaction licenses and registrations. This action allows the District to have a single entry point for coordinating licensing of all District financial services providers and mortgage licensees and registrants. In addition, since the passage of the Dodd-Frank Act, DISB has increased the number of firms under its regulatory directive. The act authorizes the District to license investment advisors managing assets of \$100 million or less, up from \$25 million or less. This transition allows the District to have greater control and regulation over securities here and to increase its impact on residents and businesses.

Impediment 4: The relatively high cost of housing continues to pose a barrier to fair housing choice in the District by fostering economic segregation and the racial segregation that accompanies it due to the median income of the District's non-Hispanic White households being so much greater than the median income of African American households. While wealthier Caucasians have been moving into neighborhoods that had been overwhelmingly African American, gentrification has accompanied this in-migration, leading to higher housing costs and displacement of a substantial percentage of residents with lower incomes who, in D.C., are disproportionately African American. In addition, the District's supply of rental housing is rapidly shrinking. More than a third of the District's rental stock was lost between 2000 and 2010. One-fourth of all District tenants are spending more than half of their income on rent, in part due to the shortage of rental dwellings. Unless lower-cost and moderate-priced rental housing can be preserved and new affordable units built in these gentrifying neighborhoods, racial and economic integration will be a very short-lived experience.

To meet their commitment to increasing affordable housing and creating diverse neighborhoods, the District's mayor and council have committed more than \$100 million of Housing Production Trust Fund monies for each of the past four years. Since 2009, the District has invested nearly one-third of a

billion dollars from the Housing Production Trust Fund—the largest trust fund of its kind per capita in the nation. In FY 2021 alone, 1,017 affordable units were produced or preserved by DHCD resources, including the Housing Production Trust Fund. Since 2015, DHCD has funded 154 projects totaling more than \$833 million in both local and federal resources to preserve and create 8,900 housing units.

Augmented by the implementation of regulatory programs and negotiations such as IZ and affordable dwelling units, the usage of planned unit developments, and increased investments in the Home Purchase Assistance Program, D.C. continues to expand affordable housing.

In addition, to preserve affordable housing, the public-private District Housing Preservation Fund was created and funded with \$10 million and will leverage, at a minimum, an additional \$30 million. Administered by the Washington, D.C., Local Initiatives Support Corporation and Capital Impact Partners, the District Housing Preservation Fund complements D.C.'s preservation efforts by providing additional funds that are easier to deploy and more flexible to aid acquisition of and predevelopment in a high-cost housing market. The District Housing Preservation Fund was created as a result of one of six recommendations/action items provided in the 2016 District Housing Preservation Strike Force's final report. The Strike Force was formed in 2015 and included an 18-member team comprising housing experts and selected stakeholders from the public to promote the preservation of the current affordable housing stock. The District acknowledges that preserving and creating affordable housing, precursors to advancing economic, racial, and ethnic diversity, may be at risk due to the loss of subsidized housing, with an additional 13,700 units with subsidies expiring by 2020. Hence, the mayor charged the Strike Force with developing a proactive, multipronged strategy and action plan to preserve the District's existing affordable housing covenants set to expire by 2020.

The six recommendations presented to the mayor were (1) establishing a Preservation Unit, (2) creating a public-private preservation fund, (3) expanding resources to preserve small properties, (4) adopting DOPA regulations, (5) advancing preservation through the Tenant Opportunity to Purchase Act, and (6) enhancing programs to allow low-income seniors to age in place.

As a result of the Strike Force recommendations, the District has formed a Preservation Unit working group comprising intragovernment partners, members of the housing industry, advocates, and District residents. Also, in March 2018, the District appointed the first housing preservation officer within DHCD to discuss, learn about, and analyze how best to preserve and expand affordable housing. Through the creation of the District Housing Preservation Fund, the District anticipates the development of a public-private partnership that would invest early and inject Affirmatively Furthering Fair Housing principles into the process of preserving the affordability of 100 percent of its existing federally and District-assisted affordable rental homes. Since the creation of the Preservation Unit, the District has found that the funds are leveraged three to one by the public-private partnership, thus providing additional opportunities to preserve existing affordable units.

The District has enacted several tax and rent-control provisions meant to reduce the rent and housing cost pressures on its elderly and disabled population. These include lowering allowable rent increases in rent-controlled apartments, deferring property taxes, and providing home modifications and repairs to allow households to remain in place.

In her second inaugural address in January 2019, Mayor Bowser set forth a goal to create an additional 36,000 units by 2025. On May 10, 2019, Mayor Bowser signed the District's first Housing Order to establish a framework to meet the goals established in the Inaugural address.

The Housing Framework for Equity and Growth (the website with the report link is <https://housing.dc.gov/page/housing-dc-publications>) provides goals for the equitable distribution of

affordable housing in Washington, D.C., supporting the vision for creating 36,000 new housing units by 2025. The report is the first in a series that will comprise the Housing Framework for Equity and Growth. The framework will examine factors across multiple scales, design typologies, and resident experiences to generate recommendations that can increase housing affordability and opportunity for all residents. In late September 2019, DHCD and the Office of Planning engaged the public to discuss the distribution of affordable units in the District at “Community Conversation: Housing Framework for Equity and Growth” at the Ron Brown High School.

Impediment 5: More than 12,000 units of new development have been exempted from the District’s IZ requirements because they were in the pipeline when the IZ act went into effect. However, their exemptions should have expired because ground has not yet been broken for these buildings. The District, however, has routinely granted extensions that have kept these developments exempt from the District’s IZ requirements. Some of these developments were allegedly submitted to avoid being covered by the new IZ provisions. At this juncture, the District is steadily providing increased economic opportunity and racial diversity through the IZ program. The program was slow to start in 2009, but to date, it has generated 1,006 affordable units.

In addition, in FY 2016, the District changed the program to facilitate using it to reach lower-income residents. Changes made by the Zoning Commission restrict IZ rentals to families earning up to 60 percent of AMI while IZ homeownership units will be restricted to families earning up to 80 percent of AMI. DHCD subsequently amended the IZ regulations in early FY 2018 in order to effectively implement these changes and modernize the program. Streamlining the application procedures and making criteria more flexible further increased the potential for this program to serve to counteract barriers to fair housing. The program continues to grow and evolve by providing diverse housing opportunities to residents who previously may have lived in low-poverty and racially concentrated areas of the District.

Impediment 6: The District’s zoning ordinance imposes significant obstacles to accessory apartments, a cost-effective way to provide housing affordable to individuals and households of modest means and to enable households with declining incomes to remain in their homes. Many of the zoning provisions likely discourage homeowners from even applying to create an accessory apartment.

This obstacle was removed in September 2016, when the District adopted new zoning regulations that facilitated the creation of accessory apartments. The issue of affordable dwelling units primarily affected residents who needed to have elderly parents reside with them, persons with disabilities who needed to have dwelling units with no-step entrances, and growing families.

The new zoning regulations, in Title 11, Subtitle U, Chapter 2, provide for (1) the existence of the dwelling unit as a matter-of-right use for single-family zones not requiring approval of the District’s Board of Zoning Adjustment; (2) a minimum principal dwelling size between 1,200 and 2,000 square feet; (3) the gross floor area that an accessory apartment may occupy to be expanded from 25 percent to 35 percent of the principal structure; (4) the entrance to the accessory apartment to be permitted to face the street, depending on the zone and subject to conditions; (5) the apartment to be in an accessory building, provided there is proper access for health and safety; (6) home occupations permitted within the accessory apartment subject to limitations; and (7) Board of Zoning Adjustment–provided special exception flexibility for up to two requirements without the need of a variance.

Impediment 7: The only reference in the District’s Comprehensive Plan that even hints at achieving stable, racially integrated neighborhoods is a fairly generic statement: “on a neighborhood level, the recent housing boom has challenged the District’s ability to grow a city of inclusive and racially and economically diverse communities.” The District’s plan has no goals, objectives, or policies that seek to achieve stable, racially integrated neighborhoods, which in the District would require economically

diverse housing because the median income of African Americans is just 37 percent that of Caucasians.

The District is currently engaged in amending its Comprehensive Plan. The previous Comprehensive Plan was amended in 2011, during a period of tremendous growth. As part of the amendment process, DHCD and the public have proposed numerous amendments to expressly address the impediments to fair housing identified by the AI. In 2019, DHCD and the Office of Planning worked together to discuss the Comprehensive Plan and its interrelationship with the District's fair housing impediments. The completion of the plan was included as part of the Mayor's Housing Order that was executed at a housing rally on May 10, 2019. In the order, the mayor tasked several District agencies to identify new policies, tools, and initiatives to begin fulfilling the goal of creating 36,000 new housing units, 12,000 of them affordable, by 2025. The order focused on the following areas:

- increasing production and accelerating delivery of housing by analyzing housing trends, needs, capacity, and impediments to housing in order to identify housing targets and policies
- promoting fair housing by identifying ways to create an equitable distribution of affordable housing across Washington, D.C., creating homeownership opportunities
- directing all District agencies to support the goals of Homeward DC
- improving the resident housing experience by directing the Lab @ DC to create a unified "front door" for residents to access affordable housing opportunities and programs

The housing strategy in the order included the need to complete the amendment process for the District's Comprehensive Plan, an important tool to create housing. As part of the process, DHCD and the Office of Planning worked together in 2019 on the Housing Framework for Equity and Growth to further this work. In early October 2019, the Office of Planning released its draft Housing Element of the Comprehensive Plan as well as "Housing Equity Report: Creating Goals for Areas of Our District." A full list of the proposed amendments, including those made by DHCD, and updates on the Comprehensive Plan amendments can be found at <https://plandc.dc.gov/>.

Impediment 8: Nothing in the District's planning process directly addresses any fair housing issues that the District can help resolve or any fair housing violations that the District can help prevent. Residential developments that require District review and approval are approved without any effort to promote compliance with the Fair Housing Act or the accessibility requirements of the Americans with Disabilities Act.

The Department of Consumer and Regulatory Affairs has made strides to enhance its permitting process and update the building code. More specifically, the Department of Consumer and Regulatory Affairs requires that all building permit applicants submit plans electronically through Project Dox for review. DHCD anticipates working with the Department of Consumer and Regulatory Affairs in the future regarding fair housing as it has with IZ. In addition, the 2013 code update provides greater accessibility to persons with disabilities, both (1) physical and (2) visual and auditory, in new construction and rehabilitation projects. Last, the changes require that 15 percent of all units be accessible in all new construction projects, which is 10 percent higher than required under Section 504 of the Rehabilitation Act of 1973.

The District recognizes that accessible housing is beneficial not only to persons using wheelchairs but also to the growing population of seniors and persons suffering temporary incapacities. To this end, the District's building code was amended through the Building Code Supplement of 2013 to provide

greater accessibility to persons with disabilities. The District also follows the American National Standards Institute Accessible and Usable Buildings and Facilities guidelines in the construction of accessible units that meet the Fair Housing Act accessibility design standards. DHCD continues to implement and enforce a robust accessible compliance mandate for all its assisted new construction and rehabilitation projects. Through its compliance program, DHCD seeks to increase accessible multifamily and single-family housing so that residents using wheelchairs can enjoy the same amenities as able-bodied residents and are able to integrally participate in their communities. DHCD plans to expand its accessible housing stock by ensuring that elements of “visit-ability” are included in its future housing projects. These elements include a zero-step entrance, doors with 32 inches of clear passage, and an accessible bathroom on the main floor of the home.

Impediment 9: The District’s zoning treatment of what it calls “community-based residential facilities” is convoluted and sometimes contradictory. It is very possible that it has contributed to the development of severe concentrations in the northeast and southeast quadrants that may be creating de facto social service districts that undermine the ability of community residences to achieve their goals of normalization and community integration.

The District continues to evaluate the provision of social services and community-based residential facilities and its implications for fair housing through its planning and funding decisions.

Impediment 10: Someone who thinks she has been discriminated against when seeking housing in the District immediately runs into the problem of determining whom to contact and how to file a fair housing complaint if she is not using the internet. This situation is a substantial barrier to fair housing choice when somebody who thinks she may have faced discrimination cannot quickly and easily contact a live person who can hear the facts of the situation or she cannot easily obtain information about how to file a fair housing complaint.

Each additional step a possible victim must take increases the chances that he will abandon his effort to report a violation. Tests of the District’s 311 information line yielded three different—and wrong—instructions about whom to contact with a possible fair housing complaint.

The District has met the goal of training frontline staff through agency partnerships and collaborations. OHR, as the civil rights enforcement agency for the District, has trained 311 Office of Unified Communications employees on the services the agency provides. These include, but are not limited to, fair housing rights, the substantially equivalent categories under the Fair Housing Act, and the complaint and filing process. Since 2014, OHR has held human rights liaison trainings for community direct-service providers, government agencies, and private and public partners on responsibilities and rights under the Fair Housing Act for their clients. Last, OHR has consistently held more than 40 liaison trainings a year since its inception.

Impediment 11: Every jurisdiction engaged in affirmatively furthering fair housing choice needs current and accurate information about matters involving fair housing. In D.C., such information is all too often not readily available or even not available at all.

OHR does not routinely keep track of whether fair housing complaints involve rental or ownership housing, hindering efforts to fully analyze the nature and extent of housing discrimination.

ERC, which collaborates with OHR on fair housing enforcement, maintains information about tenancy only for fair housing complaints based on federal law but not for complaints based on the District’s 12 additional protected classes.

OHR does not record any information about the inquiries it receives about possible housing discrimination, leaving it unable to determine the percentage of inquiries that lead to fair housing complaints.

DCHA does not maintain current records about the race and ethnicity of public housing residents by development or of users of Housing Choice Vouchers (HCVs).

To date, OHR has adhered to the recommendations suggested in the AI to “record all inquiries on housing discrimination—including the nature of the possible discrimination and whether it involves ownership or rental housing.” OHR has implemented a tracking system of docketed complaints by rental, purchase, sales, lending, condo, co-op, shelter, and other. OHR further captures written inquiries in its internal database; however, general phone inquiries are not recorded. Perhaps with a dedicated fair housing line, these data can be captured in the future.

It is noteworthy to point out that the OHR website page for filing a housing discrimination complaint is very robust and client friendly. The page walks the complainant through the process by describing fair housing issues and giving the complainant a voice on the alleged discrimination. It also provides the complainant with 17 options as to the alleged reason for the discrimination. The complaint questionnaire is usable to the layperson not familiar with legal terminology and trigger words under the Fair Housing Act. On education and outreach activities, OHR has been very active by publishing informational brochures and reports on transgender issues, language access compliance, and challenges faced by returning citizens, all areas that indirectly are affected by access to equal housing opportunity.

Similarly, ERC records the number of discrimination complaint calls received, which include fair housing complaints. In its 2016 annual report, ERC states that it “increased the number of housing discrimination referrals to HUD [US Department of Housing and Urban Development] and local governmental agencies by 75%.” ERC collects complaint information based on local protected categories; however, it is not reported on in its annual reports. DCHA does maintain records regarding race and ethnicity for Public Housing and HCV program clients.

Impediment 12: The District’s 2005 AI noted the difficulty its authors had obtaining data from D.C. *From Ideas to Action: Implementing a Mixed-Income Housing Strategy in Washington, DC* (2009) reports, “Finally, the inability to collect current data from the District and other cities limited the analysis.” While most of the District staff contacted in the process of researching this AI were very helpful, the authors frequently encountered difficulty obtaining responses from some District staff. In some departments, the direct contact was a public relations representative who served as a gatekeeper rather than enabling the authors to work directly with appropriate staff. Building code officials never responded to multiple requests for confirmation of building code provisions. Multiple requests to the head of DCHA went unheeded for months, although once other staff members were contacted, they were very helpful. Staff tended to be very narrow in their responses to inquiries for information rather than expansive as they explicitly were asked to be.

Since the 2011 AI was completed, DHCD has worked with partner agencies on planning and policy endeavors including the Consolidated Plan and Comprehensive Plan. DHCD anticipates working closely with these agencies in order to obtain better data and robust answers to effectively inform policy decisions.

In addition, DHCD has worked with these agencies regarding implementing Affirmatively Furthering Fair Housing and the submission of the forthcoming Assessment to Fair Housing and the AI update. DHCD will continue to work with agencies not under the purview of the mayor in accessing or receiving

data referencing race and ethnic composition of its clients. DHCD will continue to engage the agencies and staff and offer to provide technical support to gather such information.

The District recently hired an open data officer, and much of the required data for the AI is available at <https://dc.gov/page/open-data>. Moreover, DHCD provides, in addition to [DChousingsearch.org](https://dchousingsearch.org), numerous online dashboards that present its data to the public:

- Development Finance Division: <https://octo.quickbase.com/db/bit4kvfmq>
- Property Acquisition and Disposition Division: <https://octo.quickbase.com/db/bmnu25bzt>
- IZ and Affordable Dwelling Units: <https://octo.quickbase.com/db/bi9iqv4v7>

DHCD also teamed up with nonprofit partners to develop housinginsights.org, which places affordable housing property information in the neighborhood context by providing data on nearby properties and surrounding conditions.

Impediment 13: DCHA lacks a cogent pro-integrative policy for siting public housing and the use of HCVs. Nearly all public housing developments are located in predominantly Black areas. Most households that use HCVs are located in predominantly minority neighborhoods, many in the hyper-segregated African American neighborhood clusters that comprise wards 7 and 8.

DCHA is limited in its ability to create new public housing in areas where the agency does not own land. The locations of DCHA's existing public housing communities are relatively static as DCHA can redevelop only on the existing public housing footprint and/or on contiguous parcels of land.

However, as a partner organization in the DHCD Notice of Funding Availability (NOFA) initiative to create affordable housing, DCHA includes public housing funding as a subsidy option for owners/developers submitting proposals. NOFA allows for the creation of public housing units outside of DCHA's existing public housing footprints. In FY 2017, through the DHCD NOFA process, 76 units of public housing were created at the Phyllis Wheatley YWCA. The ward 2 neighborhood cluster where Phyllis Wheatley is located has a racial/ethnic mix of 29 percent African American, 48 percent White, and 7.8 percent Asian. In addition, Hispanics of any race make up 15 percent of the cluster population. The challenge with such an approach is that the per-unit level of public housing subsidy available has been lower than necessary to be the sole source of financing for units created through this initiative. The units at Phyllis Wheatley were created by layering locally funded housing subsidy and public housing subsidy.

Public Housing Redevelopment

With respect to existing public housing developments, DCHA has made every effort to access limited available federal funding over two decades to leverage additional financing, with the goal of redeveloping public housing into mixed-income, low-poverty, ethnically diverse communities. DCHA has received the second-highest number of HOPE VI awards nationwide, with a total of seven, and has received two Choice neighborhood planning grants, the successor program of HOPE VI. DCHA makes strategic decisions about which sites it focuses its redevelopment efforts on, given limited available resources. The age and condition of a site play a critical role in that decision-making. In many of the cases where DCHA has redeveloped public housing communities, the neighborhood clusters where the redeveloped sites are located have experienced an improved economic outlook and increased the levels of racial/ethnic diversity for the surrounding community.

HUD has not included funding in the federal budget for HOPE VI or Choice neighborhoods for several years, including in the administration's proposed FY 2019 budget. In addition, when funding has been made available, it has been on a competitive basis, oftentimes setting aside fewer than 10 awards nationally a year.

HCV Program

DCHA has adopted the following policies/programs during the past four years to increase HCV client access to low-poverty neighborhoods.

Increase DCHA Payment Standards

Unit rents in the HCV program are set in relation to HUD-established Fair Market Rents (FMRs). In the District's high-cost rental market, rents in most neighborhoods are higher than FMRs.

In response, based on HUD approval through DCHA's Moving to Work designation, the housing authority has the ability to set the maximum voucher subsidy it can pay on behalf of HCV participants (referred to as the payment standard) at levels higher than FMRs.

In FY 2016, DCHA increased its payment standards to 130 percent of FMRs in an attempt to expand the number of District neighborhoods that HCV clients could access with their vouchers.

In FY 2017, DCHA increased the HCV program payment standards to 175 percent of FMRs to further increase the number of neighborhoods that HCV clients can access with their vouchers. Based on an assessment of the 2018 FMRs, DCHA decided to continue to keep the agency payment standards at 175 percent of FMRs in FY 2018.

It should be noted that even with the ability to set higher payment standards as a means to expand access to affordable housing, not all neighborhoods in the District are rent accessible to HCV users.

Mobility Resources

In May 2015, DCHA created the Housing Affordable Living Options program, an HCV mobility program designed to assist HCV families move into low-poverty neighborhoods, also referred to as "opportunity neighborhoods." In addition to providing eligible Housing Affordable Living Options participants with mobility resources, Housing Affordable Living Options provides participating landlords with a suite of program benefits.

IV. Fair Housing Analysis

A. Demographic Summary

This demographic summary provides an overview of data concerning race and ethnicity, sex, familial status, disability status, limited English proficiency (LEP), national origin, and age. The data included reflect the composition of the region.

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

Table 1: Demographics, Race and Ethnicity

	Non-Hispanic Black/ African American		Non-Hispanic White		Hispanic/Latino		Non-Hispanic Asian, Native Hawaiian, or other Pacific Islander		Non-Hispanic American Indian/Alaska Native		Total
	#	%	#	%	#	%	#	%	#	%	
District of Columbia	314,774	45.4	253,373	36.6	76,191	11.0	27,495	3.9	1,418	0.2	692,683
Regional	1,535,282	24.8	2,819,732	45.5	976,666	15.8	622,938	10.1	12,753	0.2	6,196,585

Note: All percentages represent a share of the total population within the jurisdiction or region.

Data sources: Decennial Census, American Community Survey.

District of Columbia

The District of Columbia is the only jurisdiction in this analysis that has a larger Black population than the region as a whole. The District is 45.4 percent Black and 36.6 percent White. The District has smaller Hispanic and Asian or Pacific Islander populations than the region as a whole.

Region

The region is 45.5 percent White, 24.8 percent Black, 15.8 percent Latino, about 10 percent Asian American or Pacific Islander, and about 10 percent Native American. Comparatively, the US as a whole is about 60 percent White, 12 percent Black, 18 percent Latino, 6 percent Asian, Hawaiian, or Pacific Islander, and less than 1 percent Native American.

Table 2: Demographics, Disability Status and Type

	With a disability		With a hearing difficulty		With a vision difficulty		With a cognitive difficulty		With an ambulatory difficulty		With a self-care difficulty		With an independent living difficulty		Total civilian noninstitutionalized population
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#
District of Columbia	79,695	11.7	14,603	2.1	18,936	2.8	29,916	4.7	42,011	6.6	14,072	2.2	26,869	4.8	682,728
Region	530,902	8.7	137,130	2.2	96,668	1.6	191,985	3.4	259,195	4.5	10,1366	1.8	185,326	3.9	6,121,354

Note: All disability characteristics are based on the civilian noninstitutionalized population. All percentages represent a share of the total population within the jurisdiction or region.

Data source: 2015–2019 American Community Survey five-year estimates

District of Columbia

In general, a greater percentage of D.C.’s population has a disability than in the region as a whole.

Region

About 9 percent of the region’s population has a disability. The most common types of disability in the region are ambulatory, independent living, and cognitive disabilities.

Table 3: Demographics, County of Origin for Non-Native Born Residents

	#1 country of origin	#2 country of origin	#3 countr y of origin	#4 country of origin	#5 country of origin	#6 country of origin	#7 country of origin	#8 country of origin	#9 country of origin	#10 country of origin	Total Population
District of Columbia	El Salvador	Ethiopia	Mexic o	China	India	Dominic an Republic	Guatem ala	Colomb ia	Canada	Jamaic a	
	11,678	5,685	4,022	3,655	3,352	2,780	2,580	2,415	2,314	2,234	95,065
Region	El Salvador	India	China	Korea	Ethiopia	Guatem ala	Vietnam	Philippi nes	Mexico	Hondur as	
	194,468	103,755	75,28 7	59,430	53,699	51,108	48,953	48,806	47,427	41,226	1,412,074

Note: The 10 most often reported places of birth and languages at the jurisdiction level may not be the same as at the region level, and are thus labeled separately. China does not include Hong Kong and Taiwan.

Data source: 2015–2019 American Community Survey

District of Columbia

Among non-US-born residents of D.C., El Salvador is the most common country of origin, followed by Ethiopia, Mexico, and China. There are about twice as many residents of Salvadoran national origin as residents of Ethiopian national origin in the city.

Region

Of non-US-born residents across the region, El Salvador is the most common country of origin, followed by India, China, Korea, and Ethiopia. There are about 200,000 residents of the region who were born in El Salvador, about 100,000 who were born in India, and about 75,000 who were born in China. From each of the other most common countries of origin, there are between about 40,000 and 60,000 residents.

Table 4: Demographics, Language Spoken at Home for Those Who Speak English “Less Than Very Well”

	#1 LEP Language	#2 LEP Language	#3 LEP Language	#4 LEP Language	#5 LEP Language	#6 LEP Language	#7 LEP Language	#8 LEP Language	#9 LEP Language	#10 LEP Language	Total population
District of Columbia	Spanish	African Languages	Chinese (incl. Mandarin, Cantonese)	French (incl. Cajun and Patois)	Tagalog	Vietnamese	Portuguese	Italian	Arabic	Japanese	Total population
	19,616	3,833	2,105	1,790	763	469	416	354	275	247	36,725
Region	Spanish	Other Indo-European languages	Chinese (incl. Mandarin, Cantonese)	Other and unspecified languages	Korean	Vietnamese	Other Asian and Pacific Island languages	French, Haitian, or Cajun	Arabic	Tagalog (incl. Filipino)	Total population
	343,586	58,581	40,202	39,678	32,625	27,986	27,381	18,821	14,682	9,701	5,793,981

Note: China does not include Hong Kong and Taiwan. The 10 most often reported places of birth and languages at the jurisdiction level may not be the same as at the region level, and are thus labeled separately.

Data source: 2015–2019 American Community Survey

District of Columbia

In the District, Spanish is the most prevalently spoken language for people with limited English proficiency. From 2015 to 2019, D.C.’s population with limited English proficiency has grown by nearly 26 percent.

Region

Across the whole region, Spanish is the most prevalently spoken language for people with LEP. The remainder of the top 10 LEP languages (or language groups) in the region are as follows, in order: other Indo-European languages; Chinese (including Mandarin and Cantonese); other and unspecified languages; Korean; Vietnamese; other Asian or Pacific Islander languages; French, Haitian, or Cajun; Arabic; and Tagalog (including Filipino).

Table 5: Demographics, Growth in LEP Population

Population Growth for Persons with LEP, Washington Region, 2015-2019	
Jurisdiction	Percentage
District of Columbia	26%

Data: 2015-2019 American Community Survey 5-year estimates

Table 6: Demographics, Sex

	Total Population	Male population		Female population	
		#	%	#	%
District of Columbia	692,683	328,644	47.4	364,039	52.6
Region	6,196,585	3,028,975	48.9	3,167,610	51.1

Note: All percentages represent a share of the total population within the jurisdiction or region.
Data source: 2015–2019 American Community Survey five-year estimates

Each of the jurisdictions and the region have about equal proportions of males to females.

Table 7: Demographics, Age

	Total Population	Population under 18 years of age		Population 18-64 years of age		Population 65 and over	
		#	%	#	%	#	%
District of Columbia	692,683	123,930	17.9	485,083	70	83,670	12.1
Region	6,196,585	1,427,108	23	3,983,449	64.3	786,028	12.7

Note: All percentages represent a share of the total population within the jurisdiction or region.
Data source: 2015–2019 American Community Survey five-year estimates.

District of Columbia

The District of Columbia has lower percentages of youth under 18 years and older adults 65 years or older and a higher percentage of 18 to 64 years of age than the region as a whole.

Region

The region as a whole has a slightly lower percentage of people 65 and older (12.7 percent) than the country (15.6 percent).²

Table 8: Demographics, Family Status

	Families with Children	
	#	%
District of Columbia	51,224	41.4
Region	673,495	46.1

Note: All percentages represent a share of the total family households in the jurisdiction or region.
Data source: 2015–2019 American Community Survey five-year estimates

District of Columbia

Almost 42 percent of the District’s family households are households with children, a percentage similar to—though slightly lower than—that of the region as a whole.

Region

About 46.1 percent of the region’s family households are families with children. Family households are those with two or more people living together, at least one of whom is related to the head of household by marriage, birth, or adoption.

Table 9: Demographic Trends, District of Columbia

Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	166,031	27.4	159,173	27.8	209,464	34.8	253,373	36.6
Black, Non-Hispanic	395,115	65.1	346,078	60.5	308,617	51.3	314,774	45.4
Hispanic	32,617	5.4	44,948	7.9	54,749	9.1	76,191	11
Asian or Pacific Islander	10,646	1.8	17,119	3.0	25,154	4.2	27,495	3.9
Native American, Non-Hispanic	1,163	0.2	1,838	0.3	2,076	0.4	1,418	0.2
National Origin								
Foreign-born	58,887	9.7	73,561	12.9	76,058	12.6	95,065	13.7
LEP								
Limited English Proficiency	29,128	4.8	38,236	6.7	24,700	4.1	36,725	5.7
Sex								
Male	282,754	46.6	268,827	47.0	284,222	47.2	328,644	47.4
Female	324,146	53.4	303,232	53.0	317,501	52.8	364,039	52.6
Age								
Under 18	116,624	19.2	118,388	20.7	100,815	16.8	123,930	17.9
18-64	412,604	68.0	383,583	67.1	432,099	71.8	485,083	70
65+	77,672	12.8	70,088	12.3	68,809	11.4	83,670	12.1

Family Type								
Families with children	51,062	41.3	47,906	42.7	45,921	40.7	51,224	41.4

Note: All percentages represent a share of the total population within the jurisdiction, except family type, which is out of total family households.

Data sources: Decennial Census, American Community Survey.

The racial and ethnic demographics of the District have shifted since 1990. Most notably, the Hispanic and Asian or Pacific Islander populations have grown significantly, and the percentage of the population that is White has decreased. Specifically, the proportion of the population that is Hispanic has more than doubled. In addition, the percentage of foreign-born residents has almost doubled since 1990. The percentage of families with children in the region has increased by more than 10 percentage points since 1990.

Table 10: Demographic Trends, Region

Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	2,671,370	64.1	2,696,495	55.6	2,762,787	48.9	2,819,732	45.4
Black, Non-Hispanic	1,053,952	25.3	1,306,715	26.9	1,486,865	26.3	1,535,282	24.8
Hispanic	227,064	5.5	430,297	8.9	775,416	13.7	976,666	15.8
Asian or Pacific Islander, Non-Hispanic	198,835	4.8	364,525	7.5	580,476	10.3	662,938	10.1
Native American, Non-Hispanic	9,894	0.2	21,648	0.5	25,389	0.5	12,753	0.2
National Origin								
Foreign-born	489,041	11.7	830,998	17.1	1,140,681	20.2	1,412,074	22.8
LEP								
Limited English Proficiency	228,633	5.5	409,098	8.4	519,697	9.2	624,410	10.8

Sex								
Male	2,030,838	48.7	2,357,615	48.6	2,750,340	48.7	3,028,975	48.9
Female	2,138,525	51.3	2,492,433	51.4	2,899,200	51.3	3,167,610	51.1
Age								
Under 18	985,397	23.6	1,254,069	25.9	1,348,790	23.9	1,427,108	23
18-64	2,823,736	67.7	3,160,017	65.2	3,733,524	66.1	3,983,449	64.3
65+	360,230	8.6	435,962	9.0	567,226	10.0	786,028	12.7
Family Type								
Families with children	510,562	48.8	388,450	49.7	657,872	48.1	673,495	46.1

Note: All percentages represent a share of the total population within the region, except family type, which is out of total family households.

Data sources: Decennial Census, American Community Survey.

The racial and ethnic demographics of the region have shifted since 1990. Most notably, the Hispanic and Asian or Pacific Islander populations have grown significantly, and the percentage of the population that is White has decreased. Specifically, the proportion of the population that is Hispanic has more than doubled. The percentage of foreign-born residents has also about doubled since 1990. The percentage of families with children grew from 1990 to 2000 but dipped slightly from 2000 to 2010. From 2010 until the 2019 five-year American Community Survey (ACS), the percentage of families with children grew and surpassed the 1990 percentage.

B. General Issues

i. Segregation/Integration

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

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

Dissimilarity Index Value (0-100)	Level of Segregation
0-40	Low
41-54	Moderate
55-100	High

The Dissimilarity Index measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed within a city or metropolitan area in relation to another group. The higher the Dissimilarity Index value, the higher the extent of the segregation.

Table 11: Dissimilarity Index Values by Race and Ethnicity

Racial/Ethnic Dissimilarity Index				
District of Columbia, MD	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	73.13	73.10	63.26	66.20
Black/White	77.94	79.82	72.18	74.51
Hispanic/White	50.37	59.31	49.07	50.97
Asian or Pacific Islander/White	25.00	25.58	17.93	23.81
Washington-Arlington-Alexandria, DC-VA-MD-WV Region	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	52.16	49.33	46.78	50.34
Black/White	64.99	62.69	60.80	64.06
Hispanic/White	41.91	47.62	48.36	50.75
Asian or Pacific Islander/White	34.97	37.79	37.46	42.08

Data source: HUD tables based on 2011–2015 American Community Survey data.

District of Columbia

Overall, the District experiences high levels of segregation between Black and White populations, moderate levels of segregation between Hispanic and White populations, and low segregation between Asian or Pacific Islander and White populations. The Dissimilarity Index values for Black/White and Hispanic/White populations are higher in the District than in the region as a whole. Asian or Pacific Islander/White Dissimilarity Index values are also lower when compared to the rest of the region. The Dissimilarity Index values across all racial and ethnic categories have increased since 2010 but are all down from their 2000 numbers.

Region

Overall, the region experiences high levels of segregation between Black and White populations. The region also experiences moderate levels of segregation between Hispanic and White and between Pacific Islander and White populations. The Dissimilarity Index values across all racial and ethnic categories have increased since 2010.

The Isolation Index measures how much the typical person of a specific race is only exposed to people of the same race. For example, an 80 percent Isolation Index value for White people would mean the typical White person is exposed to a population that is 80 percent White.

Table 12: Isolation Index Values by Race and Ethnicity

District of Columbia	1980	1990	2000	2010	2020
White/White	68.27	67.22	66.22	63.19	56.93
Black/Black	88.24	86.00	83.66	76.79	67.70
Hispanic/Hispanic	6.68	14.90	20.56	17.87	17.78
Asian/Asian	5.19	7.00	7.51	7.98	10.01
Region	1980	1990	2000	2010	2020
White/White	80.60	76.88	69.70	63.53	56.69
Black/Black	70.56	65.63	63.13	58.85	54.27
Hispanic/Hispanic	5.26	14.05	20.85	25.74	29.15
Asian/Asian	4.69	8.26	12.80	18.05	22.03

Data source: "Diversity and Disparities," Spatial Structures in the Social Sciences, Brown University, accessed August 12, 2022, <https://s4.ad.brown.edu/Projects/Diversity/segregation2010/city.aspx?cityid=1150000>

District of Columbia

Isolation Index values vary among racial and ethnic groups in the District. The Isolation Index value is highest for Black residents among all racial and ethnic groups in the District and higher than the value for other Black residents in the region. The Isolation Index value for White residents in the District is the second highest. The Isolation Index values for Hispanic and Asian or Pacific Islander residents in the District are much lower than for Black and White residents, and lower than for Hispanic and Asian or Pacific Islander residents in the region.

Region

Regionally, Isolation Index values vary among racial and ethnic groups. Isolation Index values are high for both White and Black residents. Isolation Index values are low for both Hispanic and Asian residents. The regional Isolation Index value is highest for White residents, and lowest for Asian or Pacific Islander residents.

The Exposure Index measures how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

Table 13: Exposure Index Values

District of Columbia	1980	1990	2000	2010	Current
Black/White	25.44	27.49	25.43	23.90	22.35
Hispanic/White	67.08	55.40	44.12	38.21	32.50
Asian/White	72.95	67.72	57.42	50.67	43.97

White/Black	12.75	13.28	14.68	14.69	15.15
Hispanic/Black	22.70	23.73	24.59	24.81	25.15
Asian/Black	16.54	15.67	16.74	15.89	16.12
White/Hispanic	3.03	4.79	7.20	10.78	13.15
Black/Hispanic	2.04	4.25	6.96	11.38	15.02
Asian/Hispanic	4.32	7.95	11.80	14.64	16.03
White/Asian	2.62	4.69	7.33	10.21	12.77
Black/Asian	1.18	2.25	3.70	5.21	6.90
Hispanic/Asian	3.43	6.36	9.23	10.46	11.50
Region	1980	1990	2000	2010	Current
Black/White	25.44	27.49	25.43	23.90	22.35
Hispanic/White	67.08	55.40	44.12	38.21	32.50
Asian/White	72.95	67.72	57.42	50.67	43.97
White/Black	12.75	13.28	14.68	14.69	15.15
Hispanic/Black	22.70	23.73	24.59	24.81	25.15
Asian/Black	16.54	15.67	16.74	15.89	16.12
White/Hispanic	3.03	4.79	7.20	10.78	13.15
Black/Hispanic	2.04	4.25	6.96	11.38	15.02
Asian/Hispanic	4.32	7.95	11.80	14.64	16.03
White/Asian	2.62	4.69	7.33	10.21	12.77
Black/Asian	1.18	2.25	3.70	5.21	6.90
Hispanic/Asian	3.43	6.36	9.23	10.46	11.50

Data source: "Diversity and Disparities," Spatial Structures in the Social Sciences, Brown University, accessed August 12, 2022, <https://s4.ad.brown.edu/Projects/Diversity/segregation2010/city.aspx?cityid=1150000>

District of Columbia

In the District, Exposure Index values (table 3) are not proportional with populations in the city. Black residents make up the largest population group in D.C.; however, Exposure Index values to White

populations for both Asian and Hispanic residents are higher than Exposure Index values to Black populations. White residents also have relatively low exposure rates compared to all minority groups.

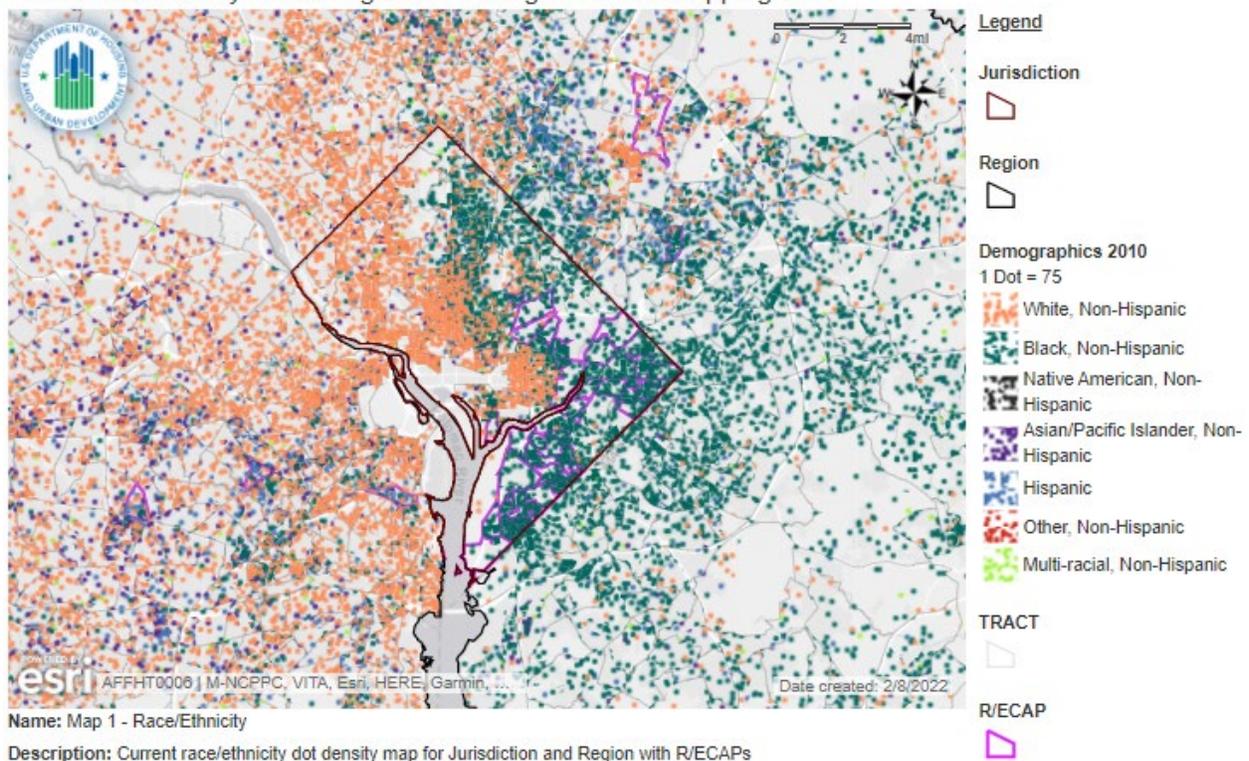
Region

Regionally, Exposure Index values are for the most part consistent with the proportions of populations in a given jurisdiction. Given that the overall population in the region is majority White, it follows that the Exposure Index values are highest for other groups when grouped with White populations. The exposure rates for White residents also relatively low compared with all minority groups. The actual population size of these groups certainly contributes, but the Exposure Index values illustrate that White residents are more likely to live in census tracts with other White residents.

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

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

Map 1: Race/Ethnicity, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

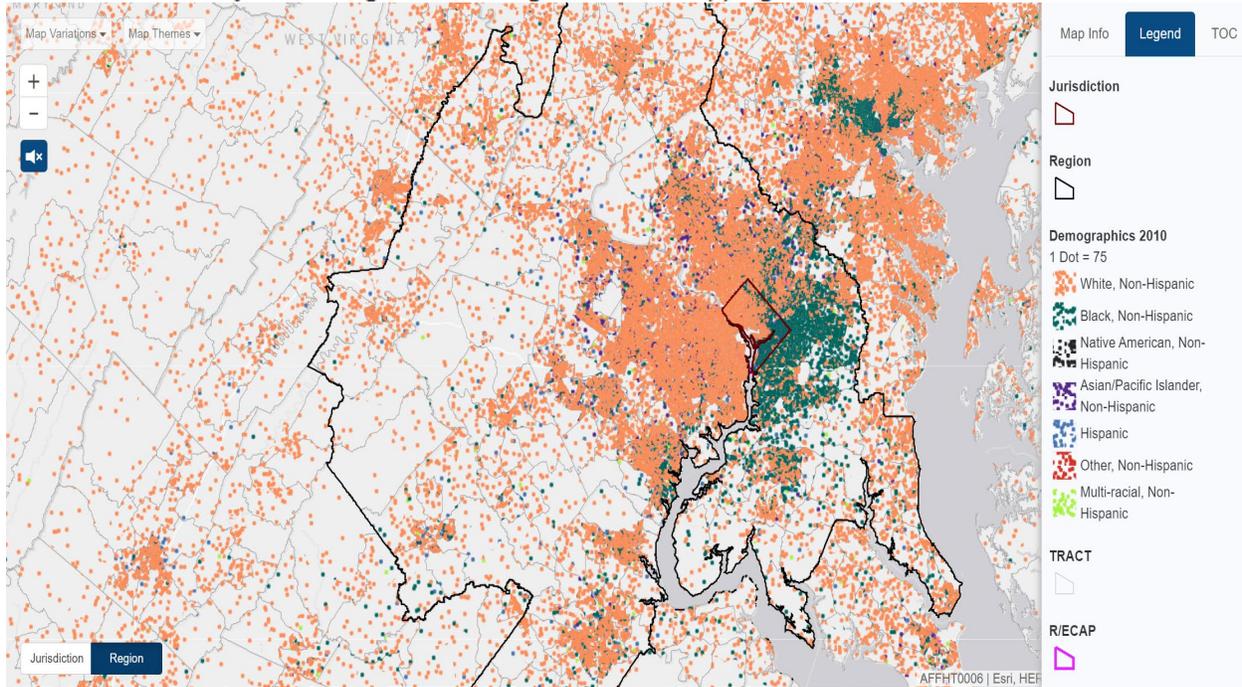


Name: Map 1 - Race/Ethnicity
 Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
 Jurisdiction: District Of Columbia (CDBG)
 Region: Washington-Arlington-Alexandria, DC-VA-MD-WV
 HUD-Provided Data Version: AFFHT0006

In D.C., a majority of the residents are Black, followed in number by White residents. There is a large number of Black residents in the racially or ethnically concentrated areas of poverty (R/ECAPs). The R/ECAPs are located in the southern and eastern portions of the District. The White population in the District is largely clustered in the northwest quadrant.

Map 2: Race/Ethnicity, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

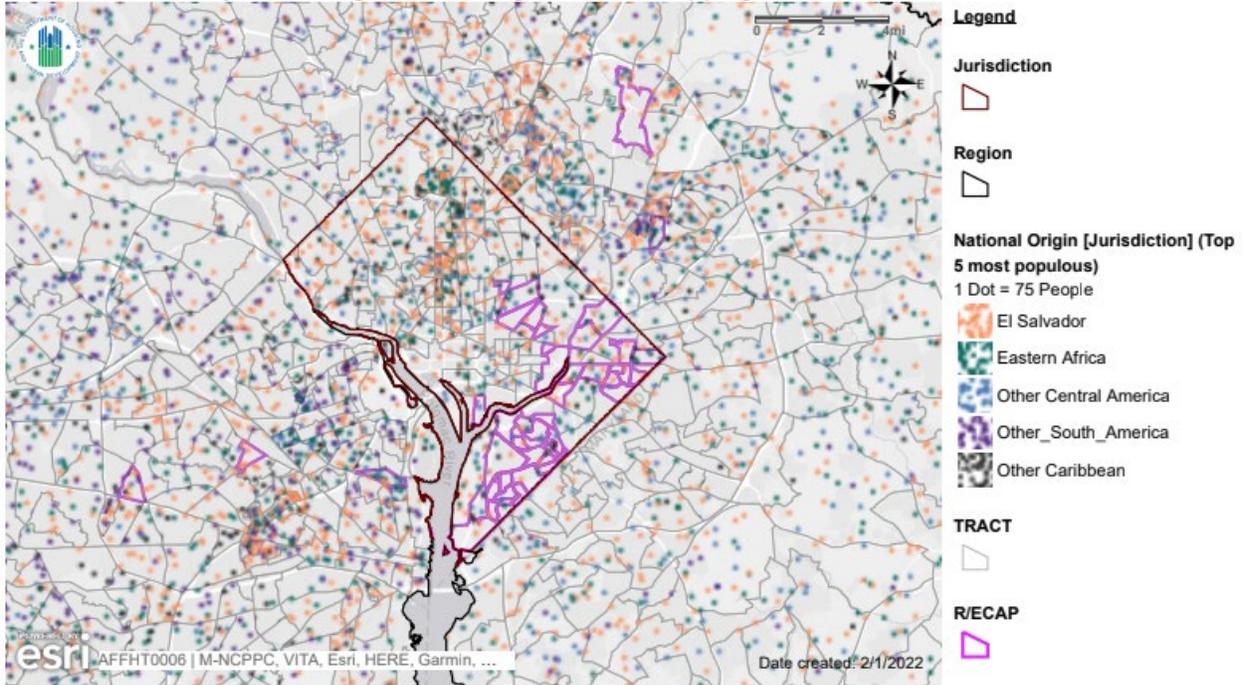
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Regionally, a majority of the residents are White; the second-most-populous group is Black. The eastern portion of the region has the most diversity among racial and ethnic groups. The western portion of the region is predominantly White. The racially or ethnically concentrated areas of poverty (R/ECAPs) are also predominantly seen in the eastern portion of the region.

Map 3: National Origin, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

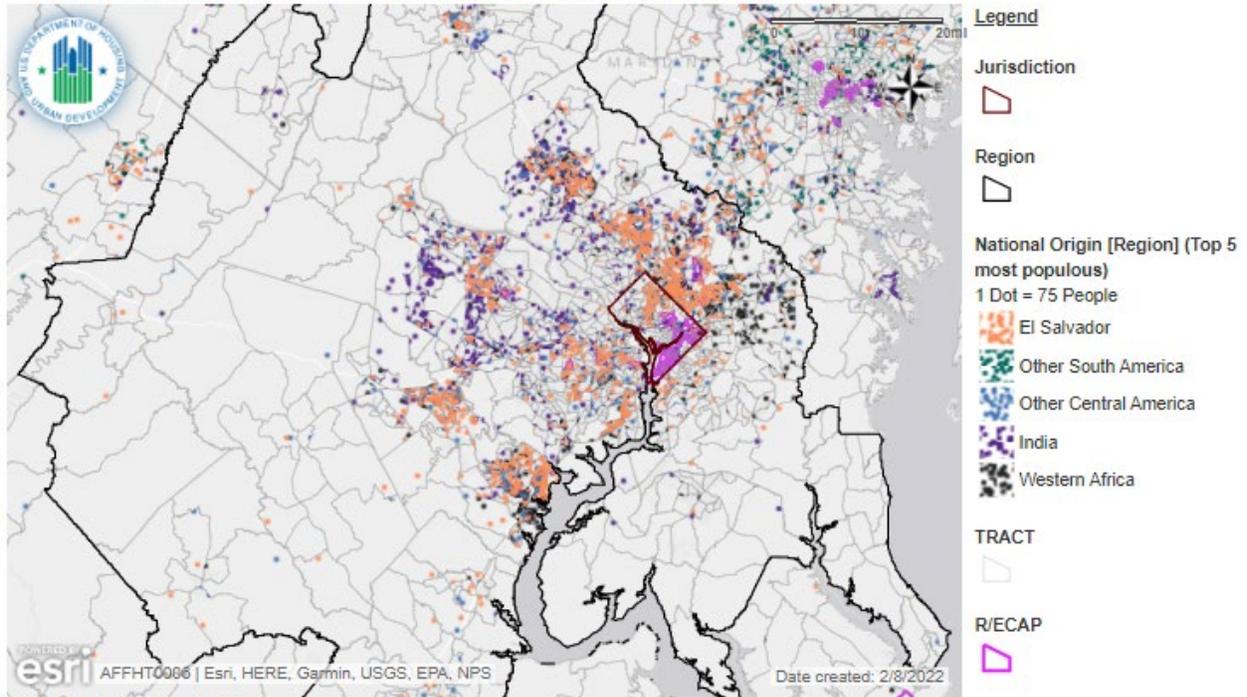
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

In D.C., the most common nationality of non-native-born residents is Salvadoran. The second-most-common nationalities are Ethiopian, followed by Chinese. There are large clusters of Salvadoran and Eastern African residents in the R/ECAP areas.

Map 4: National Origin, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

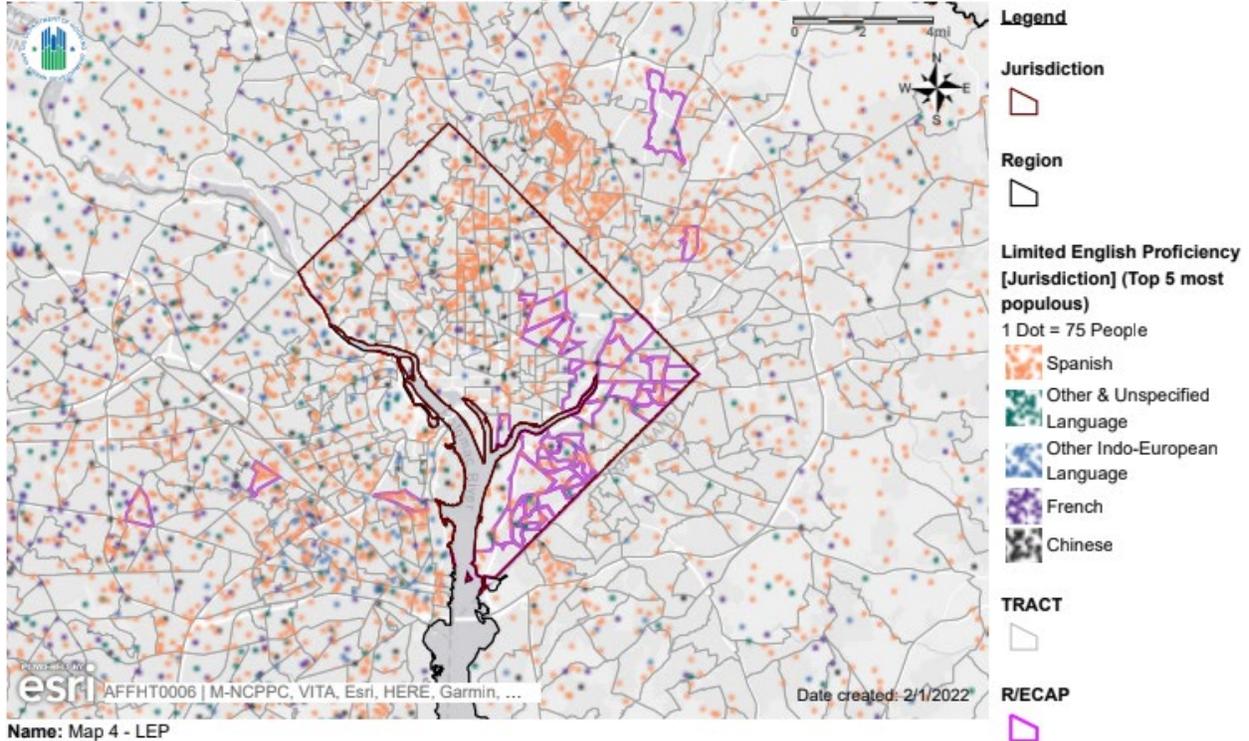
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Regionally, the most common nationality of non-native-born residents is Salvadoran. The second-most-common nationality is Indian, followed by Chinese. Non-native-born residents are most prevalent in the eastern portion of the region. Comparatively, there are very few non-native-born residents in the western portion of the region.

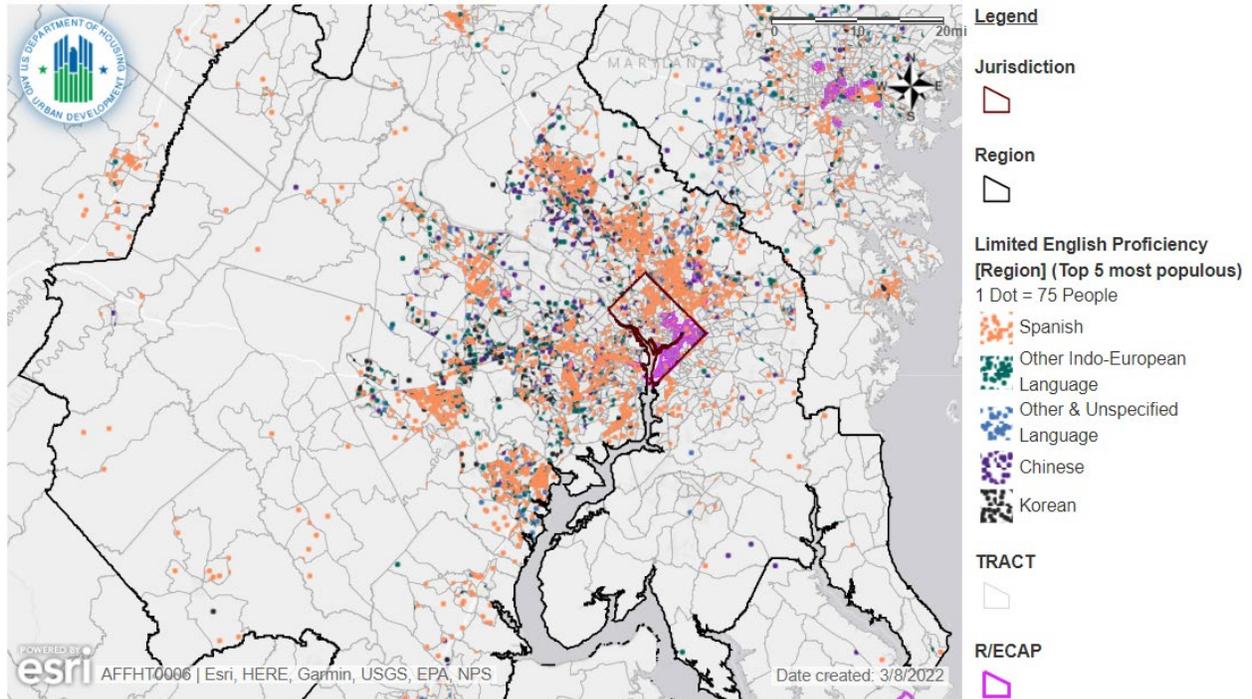
Map 5: Limited English Proficiency, District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



In D.C., slightly more than 5 percent of the population speaks with limited English proficiency. The top foreign languages spoken by those with limited English proficiency are Spanish, other and unspecified languages, French, and Chinese (including Mandarin and Cantonese). Since 2015, the persons with limited English proficiency population has grown by 38 percent. Large clusters of the Spanish and other and unspecified languages limited English proficiency populations reside in the R/ECAPs.

Map 6: Limited English Proficiency, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

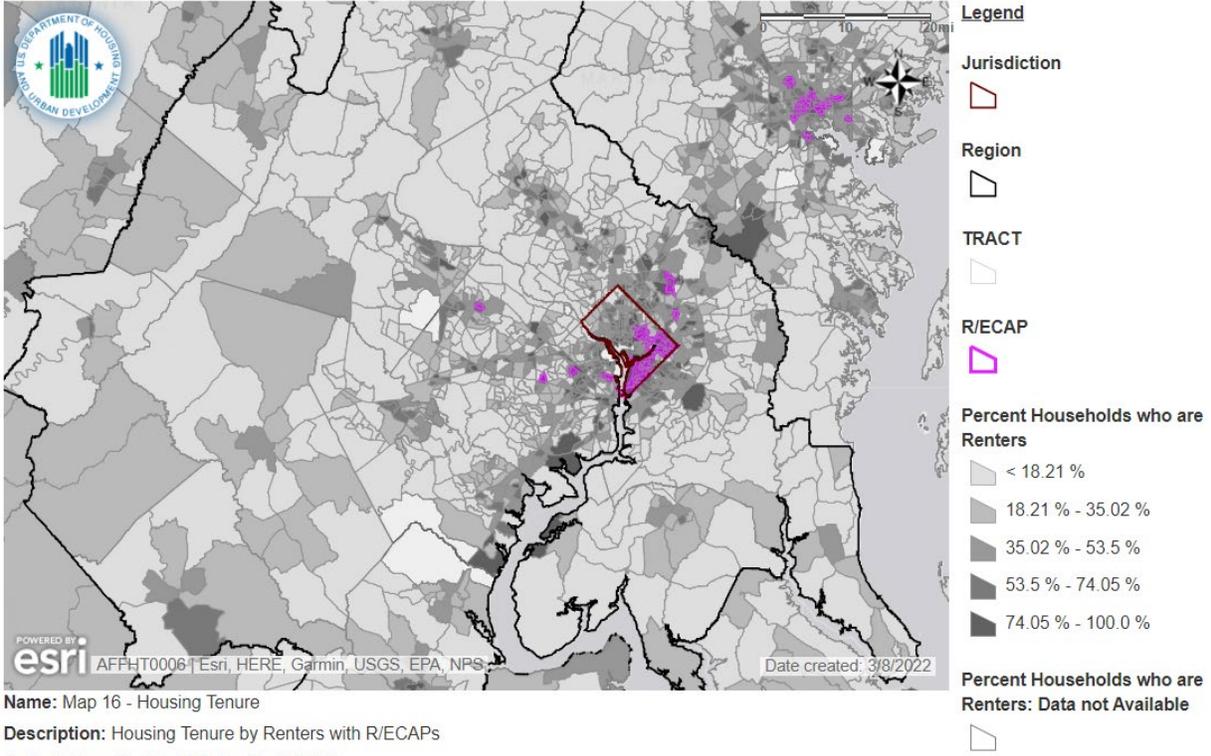
Regionally, almost 10 percent of the population has limited proficiency in English. The top languages spoken by those with LEP are Spanish, other Indo-European languages, and unspecified languages. The majority of LEP residents reside in the eastern portion of the region, with very few in the western portion of the region.

Map 7: Percentage of Renter-Occupied Households, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



In D.C., the location of renters largely correlates with aforementioned patterns of racial and ethnic segregation. The western portion of the District has the lowest concentration of renters. The eastern and southern portions of the District have the highest concentrations of renters. The majority of renters reside in the District’s R/ECAP areas.

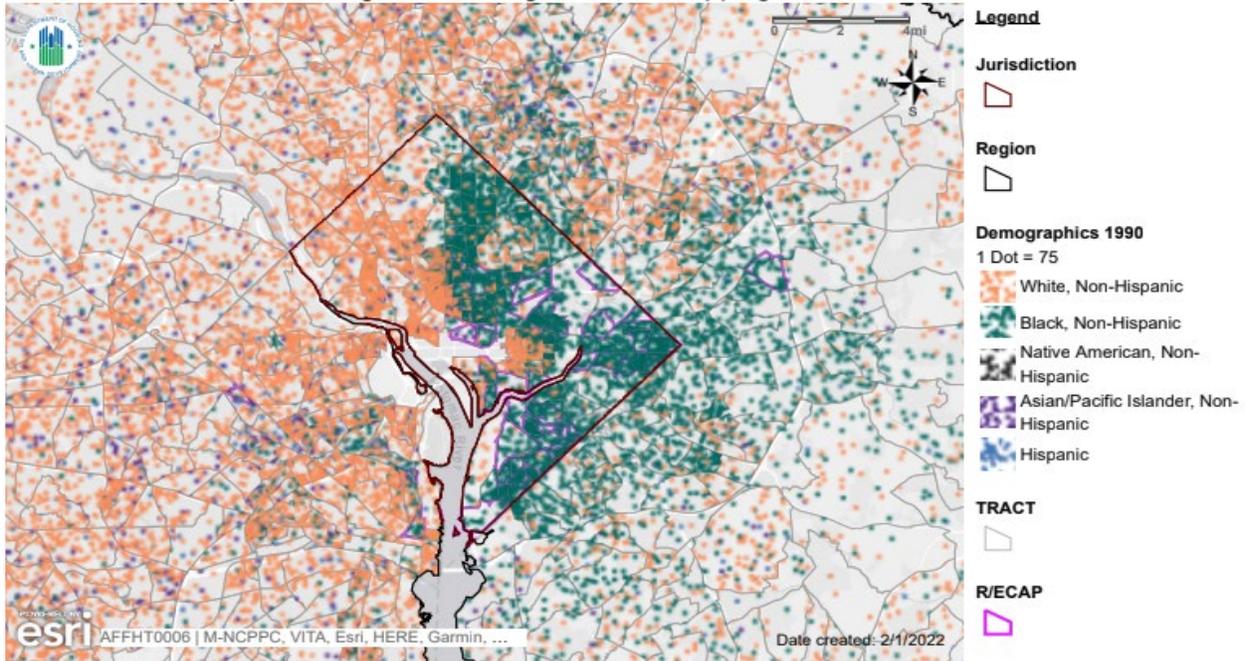
Map 8: Percentage of Renter-Occupied Households, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Regionally, the location of renters largely correlates with aforementioned patterns of racial and ethnic segregation. The percentage of renter-occupied households increases near the more urban areas of the region, a spatial pattern that also often correlates with the areas with a larger percentage of minority residents.

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

Map 9: Racial Demographics in 1990, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

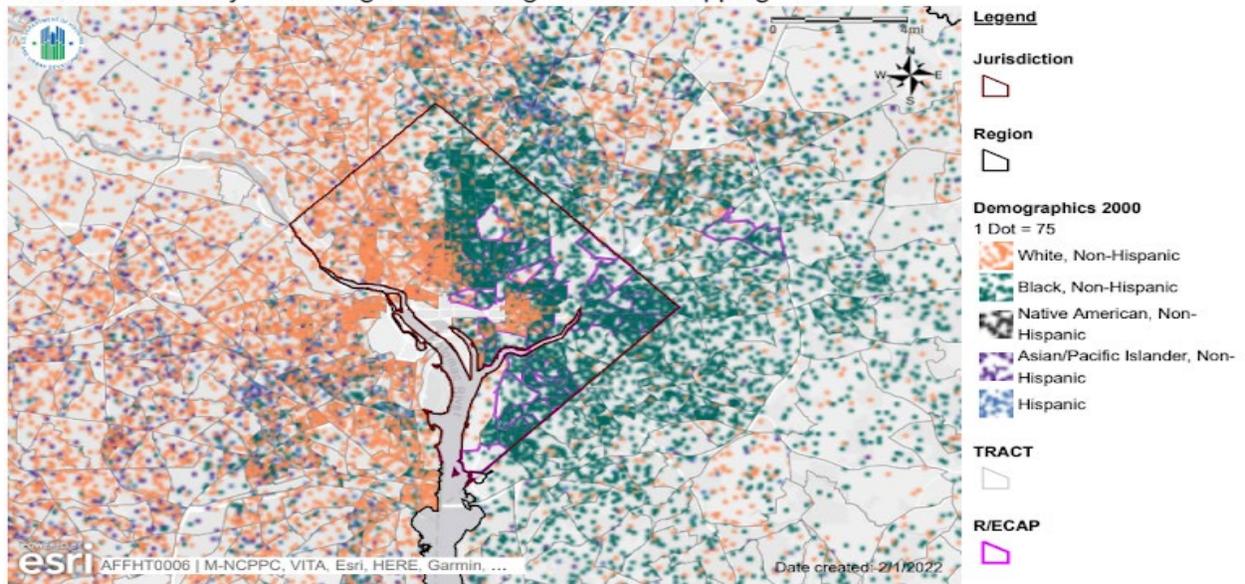
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 10: Racial Demographics in 2000 District of Columbia

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

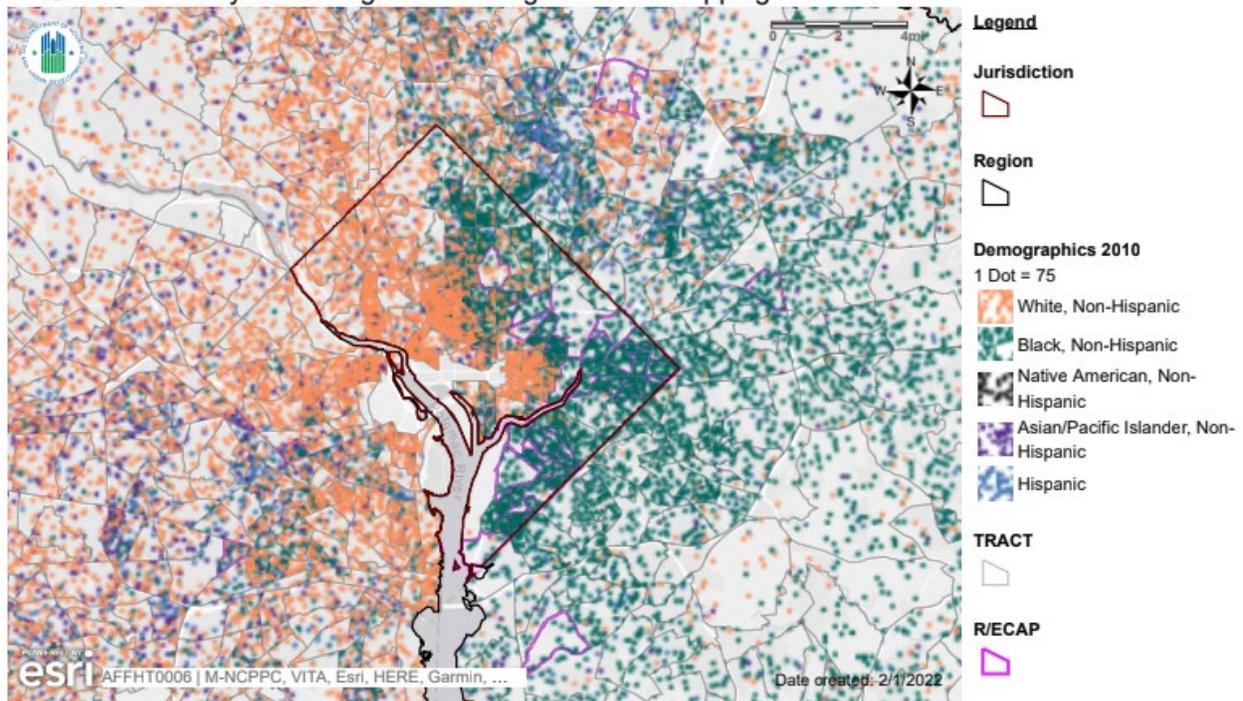
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 11: Racial Demographics in 2010, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

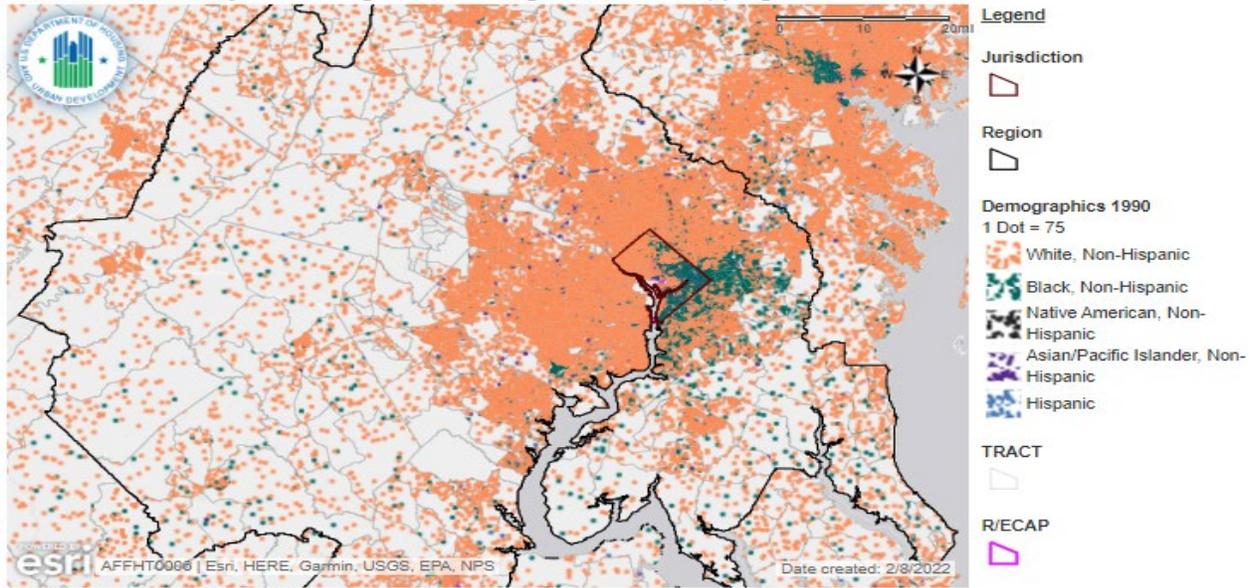
HUD-Provided Data Version: AFFHT0006

District of Columbia

Segregation in the District has decreased overall since 1990, but the District is still very segregated. Dissimilarity Index values for non-White/White, Black/White, and Asian or Pacific Islander/White have all decreased since 1990 (table 11, page 30). The Hispanic/White Dissimilarity Index value today is nearly identical to the 1990 value. In 1990, non-White/White and Black/White both experienced high levels of segregation based on the Dissimilarity Index. Today, these values still correspond to high levels of segregation. Hispanic/White Dissimilarity Index values over time correspond to medium levels of segregation. Exposure Index values for Black and Hispanic residents in relation to White residents have increased since 1990. Today, the Exposure Index values for Asian or Pacific Islander residents in relation to White residents are nearly identical to the 1990 values. These values, taken together with the Dissimilarity Index values, indicate that while minority populations are becoming less segregated from White populations in D.C., the overall levels of segregation are still quite high.

Map 12: Racial Demographics in 1990, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

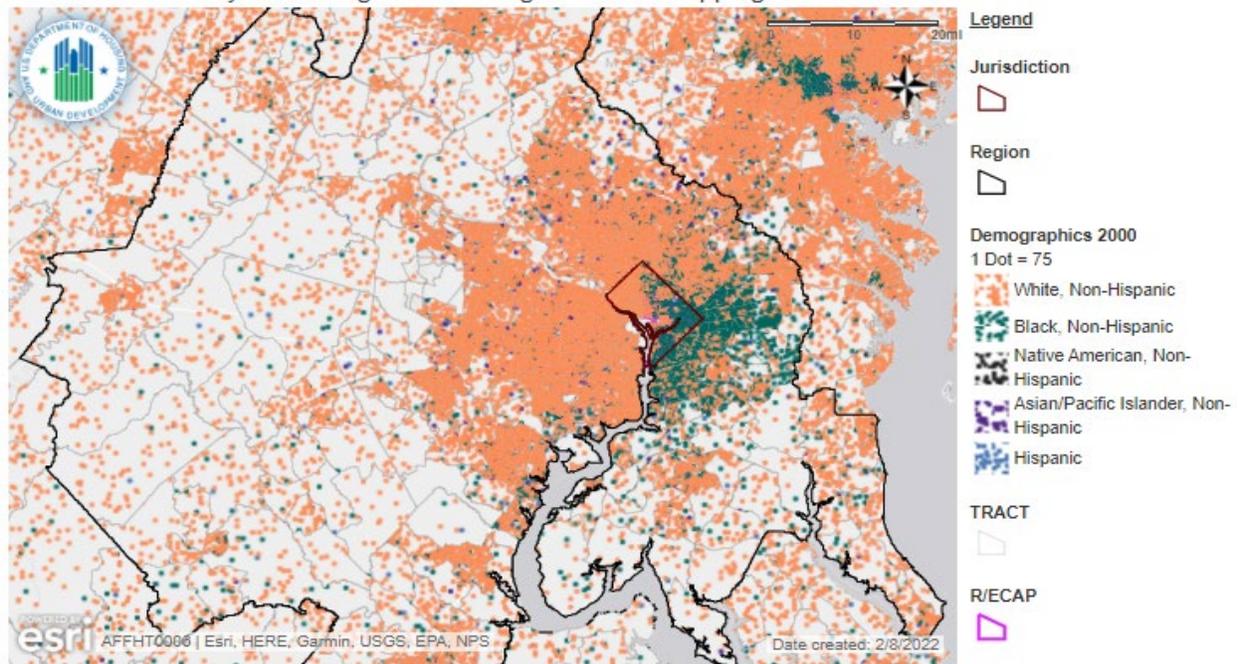
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 13: Racial Demographics in 2000, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

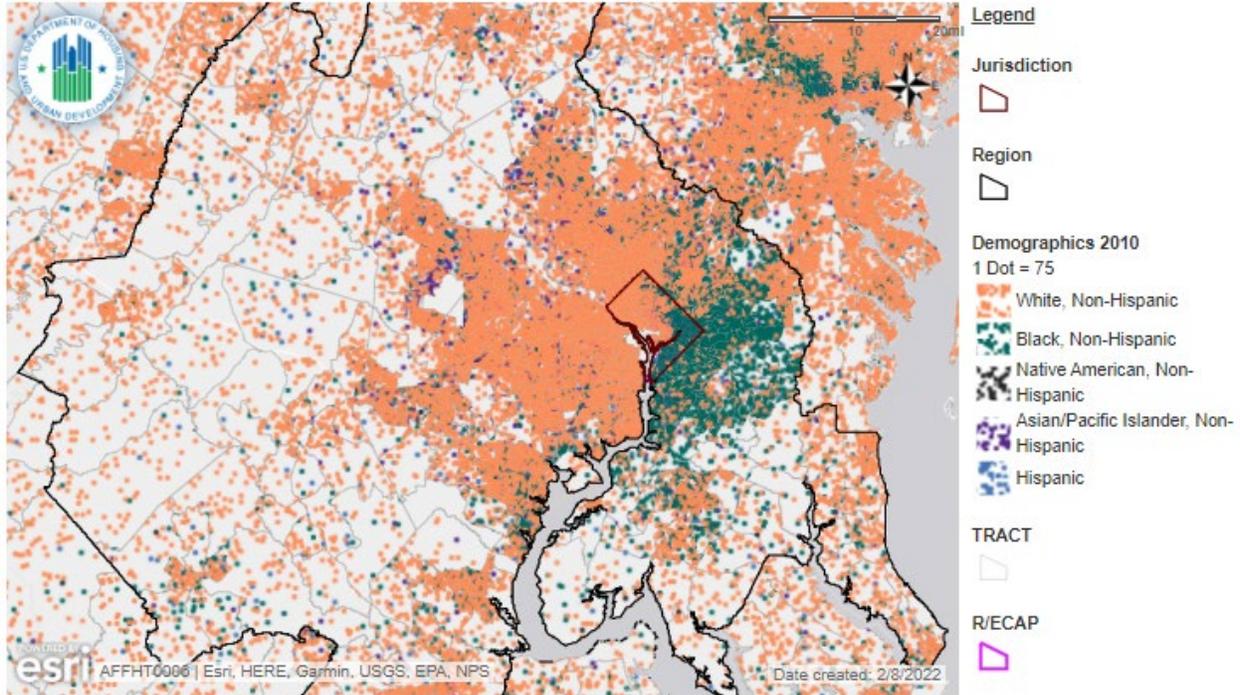
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 14: Racial Demographics in 2010, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Region

Regionally, segregation is on the rise. Dissimilarity Index values for Non-White/White and Black/White are nearly identical to the 1990 values. These values dipped slightly in 2010 and then rose again between 2010 and the present. Since 1990, the Dissimilarity Index values have increased for Hispanic/White and Asian or Pacific Islander/White. The Dissimilarity Index values for Non-White/White, Hispanic/White, and Asian or Pacific Islander/White all correspond to medium levels of segregation. The Dissimilarity Index value for Black/White corresponds to a high level of segregation. The Exposure Index values across all ethnic groups in relation to White residents have also decreased since 1990. Exposure Index values of minority groups in relation to other minority groups have increased since 1990. These values, taken together with the Dissimilarity Index values, indicate that while minority populations are becoming more segregated from White populations, minorities are becoming less isolated with respect to other minorities.

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

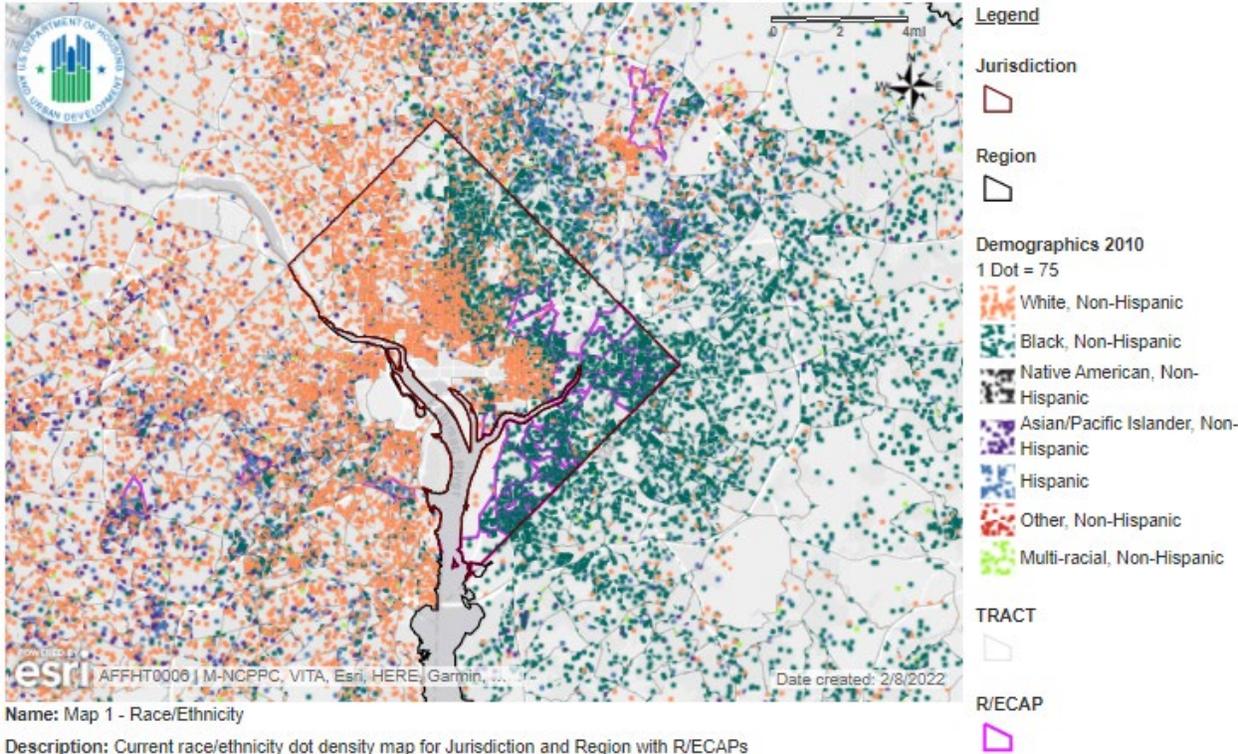
R/ECAPs are geographic areas with significant concentrations of poverty and populations of people of color. HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50 percent or more. With regard to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty line or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower. In the region, which has a significantly lower rate of poverty than the nation as a whole, the latter of these two thresholds is used.

Where one lives has a substantial effect on mental and physical health, education, exposure to crime, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. Concentrated poverty is also associated with higher crime rates and worse health outcomes. However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to proximity to job centers. Ethnic enclaves may help immigrants build a sense of community and adapt to life in the United States. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes. Overall, identifying R/ECAPs facilitates understanding of entrenched patterns of segregation and poverty.

Data note: Some of the tables and maps in this section are sourced from the HUD tool, which used 2011–2015 five-year ACS data. These maps and tables are accessible to all and can be used by anyone to numerically and spatially analyze their jurisdictions or communities of interest. Other tables and maps that the Urban Institute created are based off of 2015–2019 five-year ACS data. Due to this, some of the maps identify different census tracts as R/ECAPs and reflect slightly different demographic data.

1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

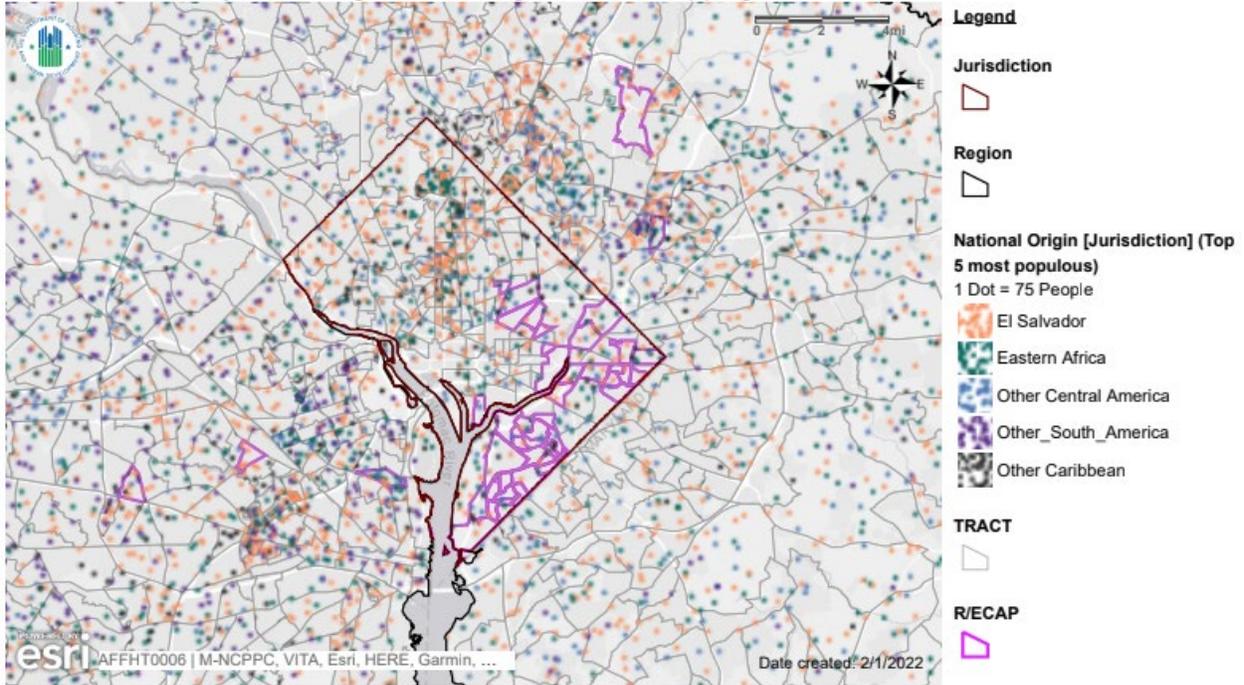
Map 15: R/ECAPs in Jurisdiction with Race/Ethnicity, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity
 Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
 Jurisdiction: District Of Columbia (CDBG)
 Region: Washington-Arlington-Alexandria, DC-VA-MD-WV
 HUD-Provided Data Version: AFFHT0006

All of the R/ECAPs within the District are located in the eastern quadrants of the District, with most located in Southeast D.C. Southeast D.C. historically has had high rates of Black residents and a lack of public or private investment. While about 50 percent of city residents are Black, Black individuals make up almost 95 percent of the residents living in R/ECAPS. Racialized lending policies, deed covenants, and exclusionary zoning have concentrated White wealth in Northwest D.C., shrunk Black capital and land access, and displaced Black residents.

Map 16: R/ECAPs in Jurisdiction with National Origin, District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

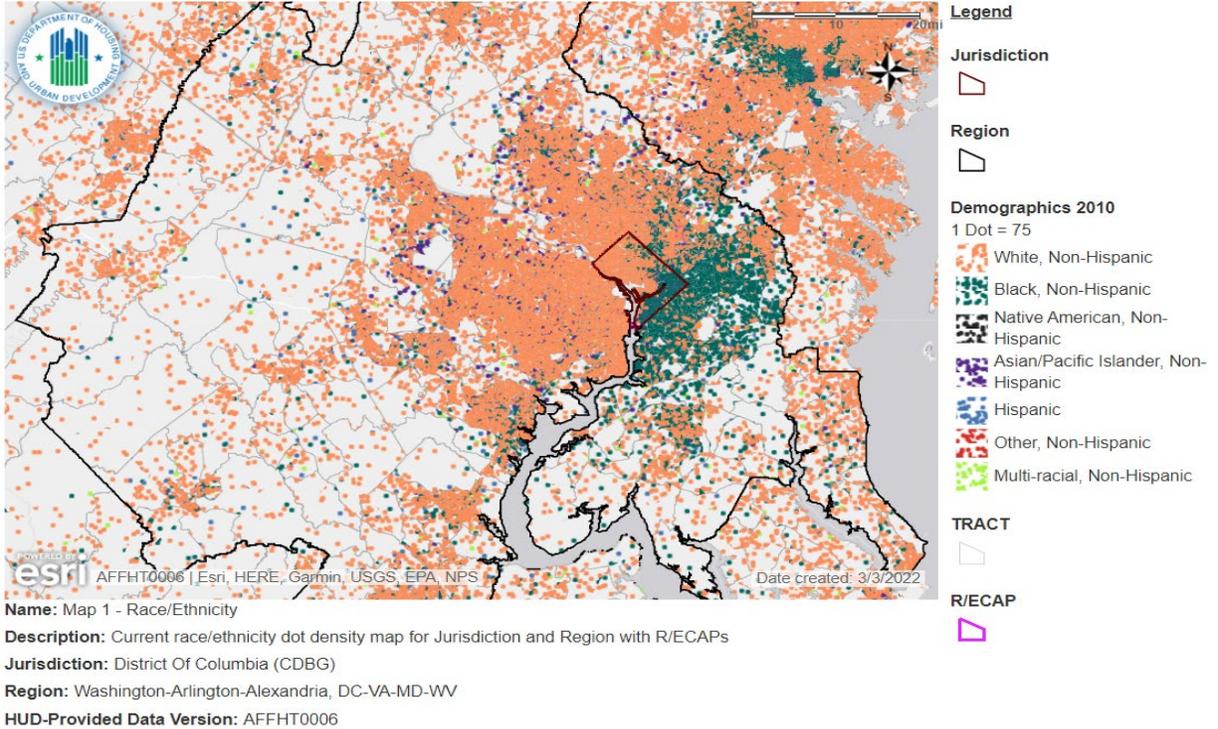
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Most residents living within R/ECAPs in the District were born in the United States. Of foreign-born residents of R/ECAPs, individuals from East Africa, El Salvador, and West Africa are the most prevalent, comprising 0.70 percent, 0.55 percent, and 0.47 percent of residents, respectively.

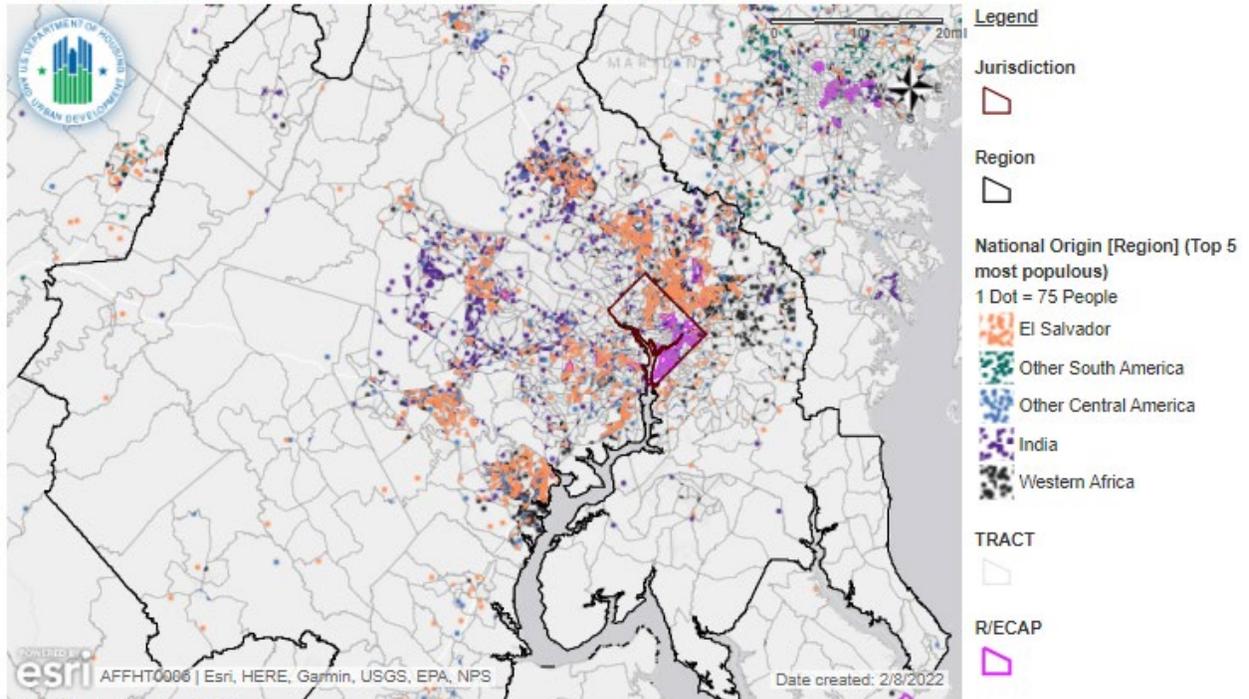
Map 17: R/ECAPs in Jurisdiction with Race/Ethnicity, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Within the region, most of the R/ECAPs are within the District and in primarily Black areas. Historically, federal housing policies bolstered White flight from cities like the District, creating segregated suburbs.³ Even with the lower poverty rate threshold for R/ECAP status in effect, the relative economic prosperity of the region results in some racially and ethnically diverse areas with low-income populations—in eastern Montgomery County, southeastern Fairfax County, and eastern Prince William County—not being classified as R/ECAPs.

Map 18: R/ECAPs in Jurisdiction with National Origin, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

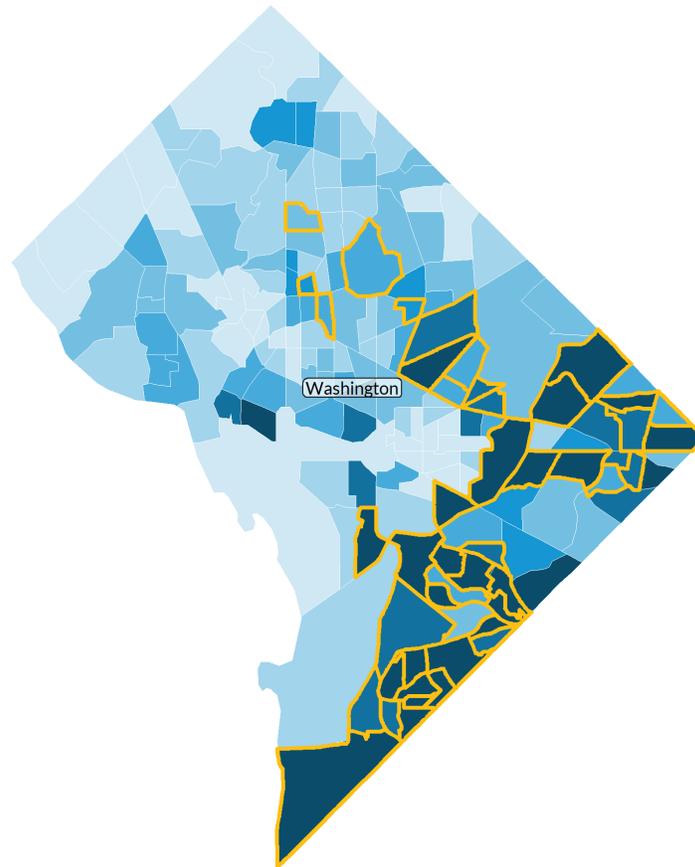


Across the region, Salvadoran and other Central Americans are the most prevalent foreign-born residents to live in R/ECAPs. Within R/ECAPs, Salvadorans make up just under 3.0 percent and other Central Americans make up 2.5 percent of residents.⁴

Map 19: R/ECAPs in Jurisdiction with Poverty Rates, District of Columbia

Poverty Rates by Census Tract in District of Columbia

R/ECAPs Highlighted in Yellow



Source: American Community Survey 5-Year Estimates, 2015-2019

Most of the R/ECAPs within the District are located in the eastern quadrants of D.C., primarily Southeast D.C. Southeast D.C. historically has had high rates of Black residents and lack of public or private investment. While 6.8 percent of District residents live in poverty, all of the R/ECAPs in the District have poverty rates greater than 10 percent, with many having poverty rates greater than 30 percent, particularly in wards 6, 7, and 8. Compared to the HUD maps, these more recent data show a larger number of R/ECAPs, particularly outside of the core area of Southeast D.C. At least three R/ECAPs are identified in Northwest D.C., particularly in relatively heavily Hispanic areas like Columbia Heights and 16th Street Heights.

1.b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do the demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

Table 14: R/ECAP Demographics

R/ECAP Race/Ethnicity	District of Columbia		Region	
	#	%	#	%
Total Population in R/ECAPs	120,672	-	150,440	-
White, Non-Hispanic	2,112	1.75%	8,904	5.92%
Black, Non-Hispanic	113,145	93.76%	119,872	79.68%
Hispanic	3,016	2.50%	16,312	10.84%
Asian or Pacific Islander, Non-Hispanic	355	0.29%	2,646	1.76%
Native American, Non-Hispanic	266	0.22%	325	0.22%
Other, Non-Hispanic	141	0.12%	225	0.15%
R/ECAP Family Type				
Total Families in R/ECAPs	26,761	-	32,565	-
Families with children	14,054	52.52%	17,062	52.39%

Table 15: R/ECAP Demographics

#	County of origin	District of Columbia		Region		
		#	%	County of origin	#	%
#1	Eastern Africa	843	0.70%	El Salvador	4,484	2.98%
#2	El Salvador	669	0.55%	Other Central America	3,757	2.50%
#3	Western Africa	562	0.47%	Other South America	1,314	0.87%
#4	Other Caribbean	539	0.45%	Mexico	1,219	0.81%
#5	Jamaica	394	0.33%	Eastern Africa	1,020	0.68%

#6	Other South America	375	0.31%	Western Africa	899	0.60%
#7	Middle and Southern Africa	264	0.22%	Other Caribbean	809	0.54%
#8	Other Central America	217	0.18%	Other South Central Asia	722	0.48%
#9	Mexico	146	0.12%	China excl. Taiwan	496	0.33%
#10	Japan	119	0.10%	India	484	0.32%

District of Columbia

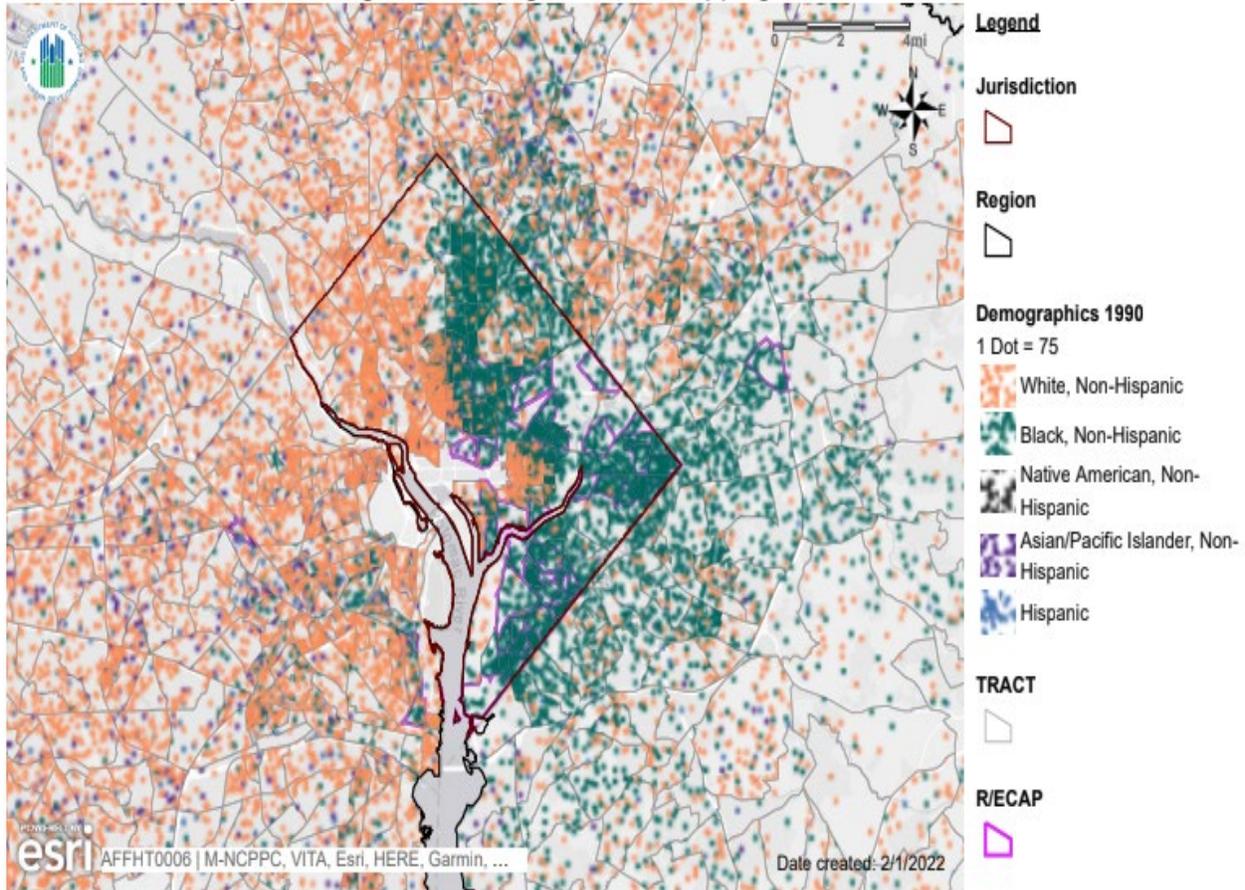
In the District, almost 95 percent of residents of R/ECAPs are Black. Of families living in R/ECAPs in the city, 53 percent are families with children. Black individuals are most disproportionately residents of R/ECAPs as they make up around 40 percent of the population of the city but almost 95 percent of the population of R/ECAPs in the city. The demographics of R/ECAPs in the region are heavily driven by the demographics of R/ECAPs in the District, which is home to a large majority of the region's R/ECAPs.

Region

In the region, 80 percent of residents of R/ECAPs are Black and 11 percent are Hispanic. Over one-half of families living in R/ECAPs in the region are families with children. Over 5 percent of R/ECAP residents in the region are originally from El Salvador and other Central American countries. Black individuals are most disproportionately residents of R/ECAPs as they make up one-quarter of the population of the whole region but 80 percent of the population of R/ECAPs in the region. The demographics of R/ECAPs in the region are heavily driven by the demographics of R/ECAPs in the District, which is home to a large majority of the region's R/ECAPs. Suburban R/ECAPs tend to be more heavily Hispanic than those in the District.

1.d. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Map 20: R/ECAPs and Racial Demographics in 1990, District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

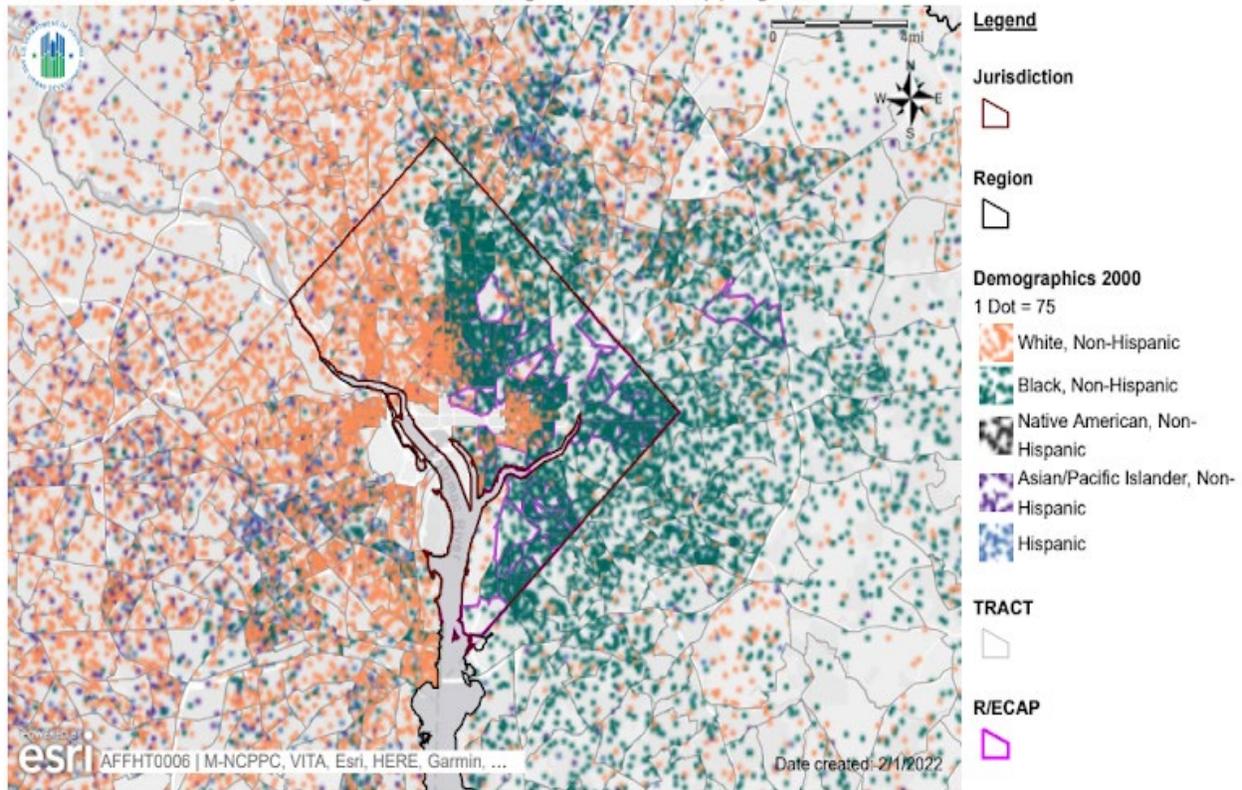
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

In 1990, the R/ECAPs in D.C. were mostly in the city’s eastern quadrants, primarily Southeast D.C., and all were disproportionately Black. However, there were many R/ECAPs at that time in Northwest D.C. neighborhoods like Chinatown, Logan Circle, Shaw, Columbia Heights, and Petworth as well as in Southwest D.C. With the exception of Chinatown, which was predominantly Asian American in 1990, these other areas were also predominantly Black.

Map 21: R/ECAPs and Racial Demographics in 2000, District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

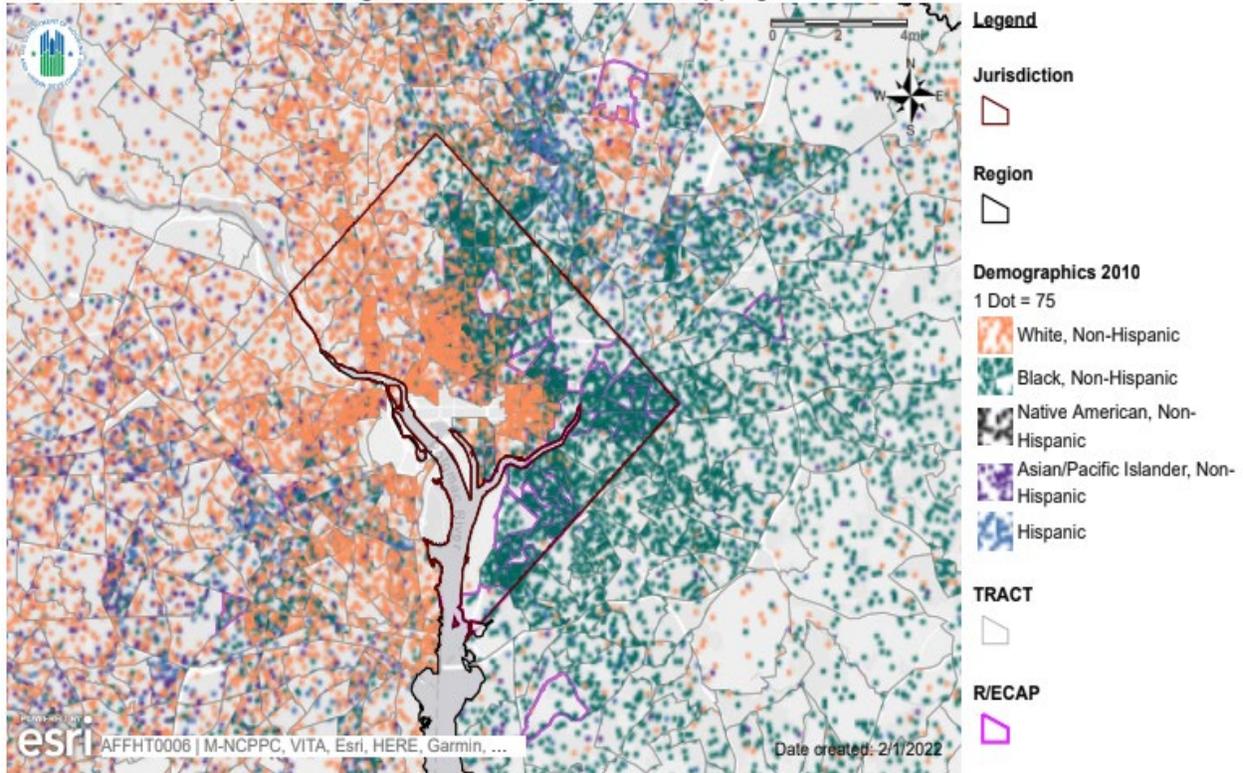
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

In 2000, the R/ECAPs in the District were mostly in the eastern quadrants of the city, primarily in the southeast part of the city, and all were disproportionately Black. There were fewer R/ECAPs in centrally located neighborhoods in the northwest, like Shaw, and in Southwest D.C. than in 1990 but more than there are today.

Map 22: R/ECAPs and Racial Demographics in 2010, District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

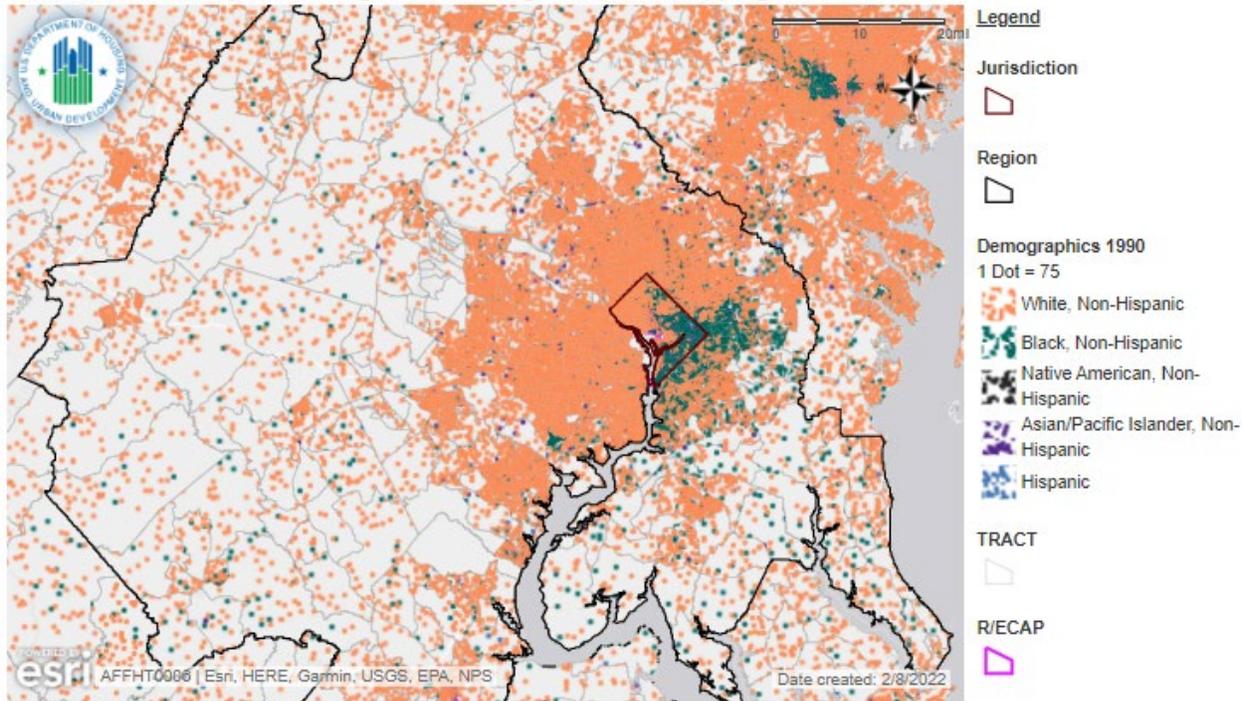
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

In 2010, the R/ECAPs in the District were mostly in the eastern quadrants of the city, primarily in Southeast D.C., and all were disproportionately Black. There continued to be a few remaining R/ECAPs in Northwest D.C. and one in Southwest D.C., though fewer than in 2000. These areas were mostly Black but had more significant Hispanic populations than those of R/ECAPs in southeast and Northeast D.C. Overall, the R/ECAPs in 2010 were similar to the current R/ECAPs.

Map 23: R/ECAPs and Racial Demographics in 1990, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

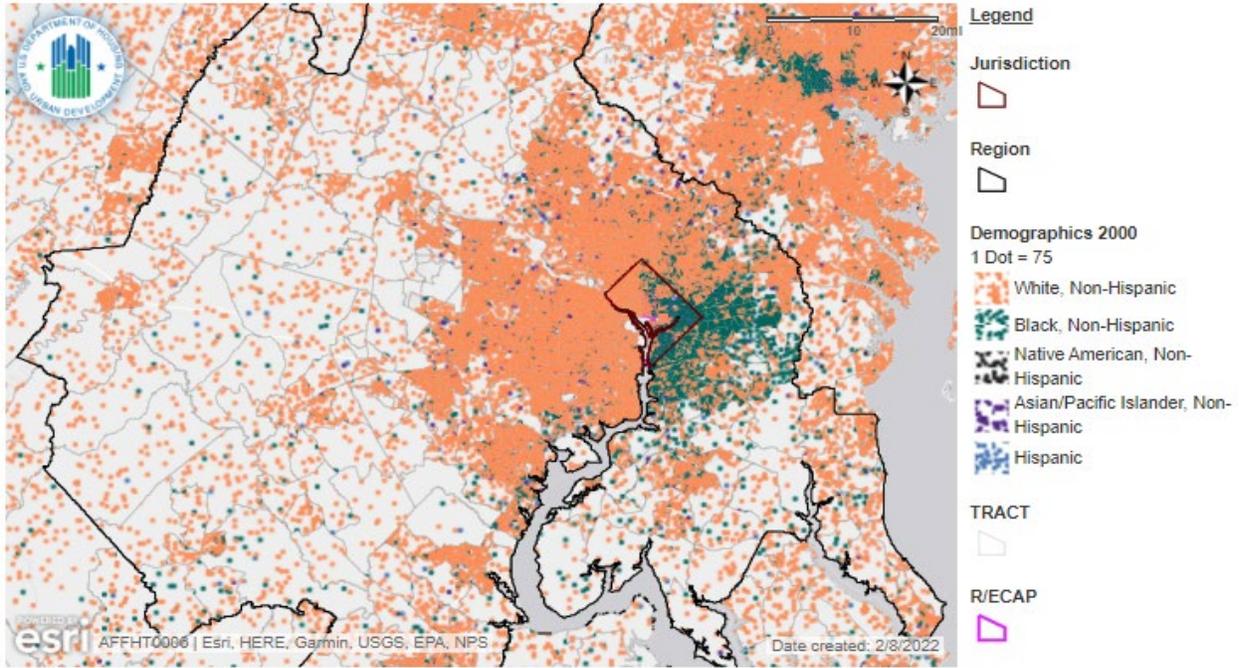
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

In 1990, the R/ECAPs were located primarily in the District and were predominantly located in majority Black neighborhoods.

Map 24: R/ECAPs and Racial Demographics in 2000, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

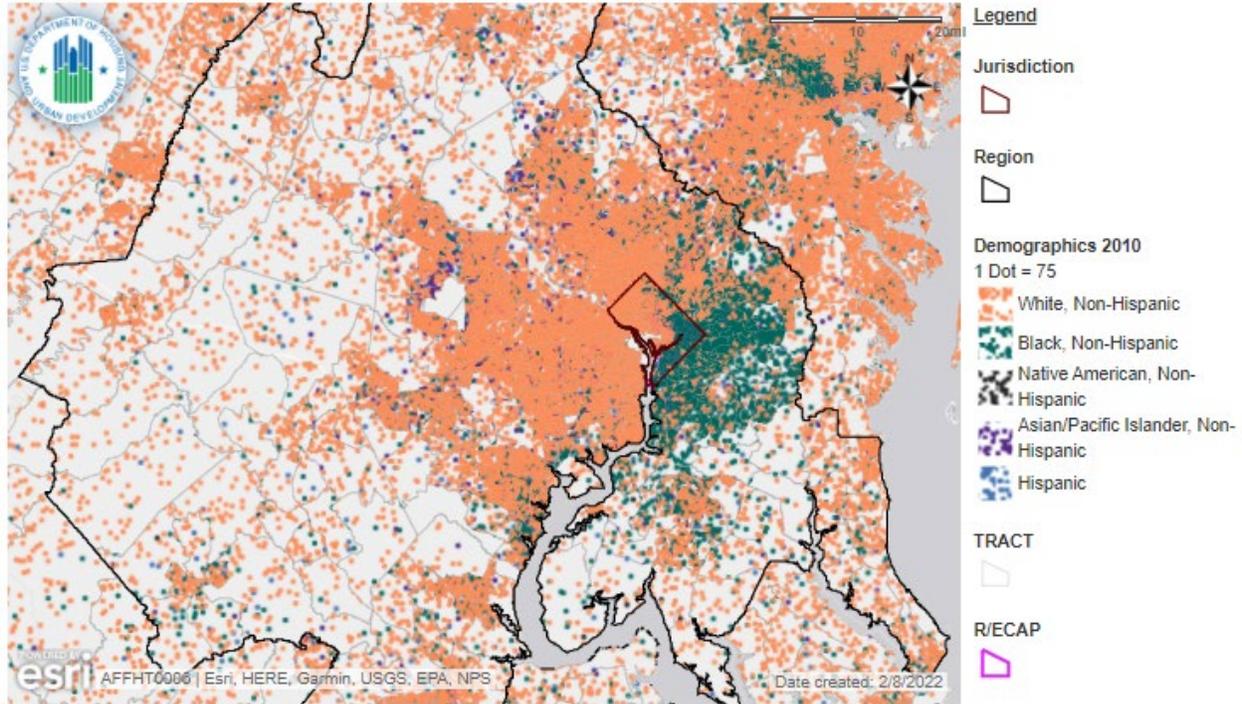
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

In 2000, most of the R/ECAPs in the region were in predominantly Black neighborhoods in the southeast and northeast areas of D.C.

Map 25: R/ECAPs and Racial Demographics in 2010, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: District Of Columbia (CDBG)
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV
HUD-Provided Data Version: AFFHT0006

In 2010, most of the R/ECAPs in the region were in the southeast and northeast areas of D.C.

iii. Disparities in Access to Opportunity

a. Disparities in Access to Opportunity—Education

i. Describe any disparities in access to proficient schools in the jurisdiction and region.

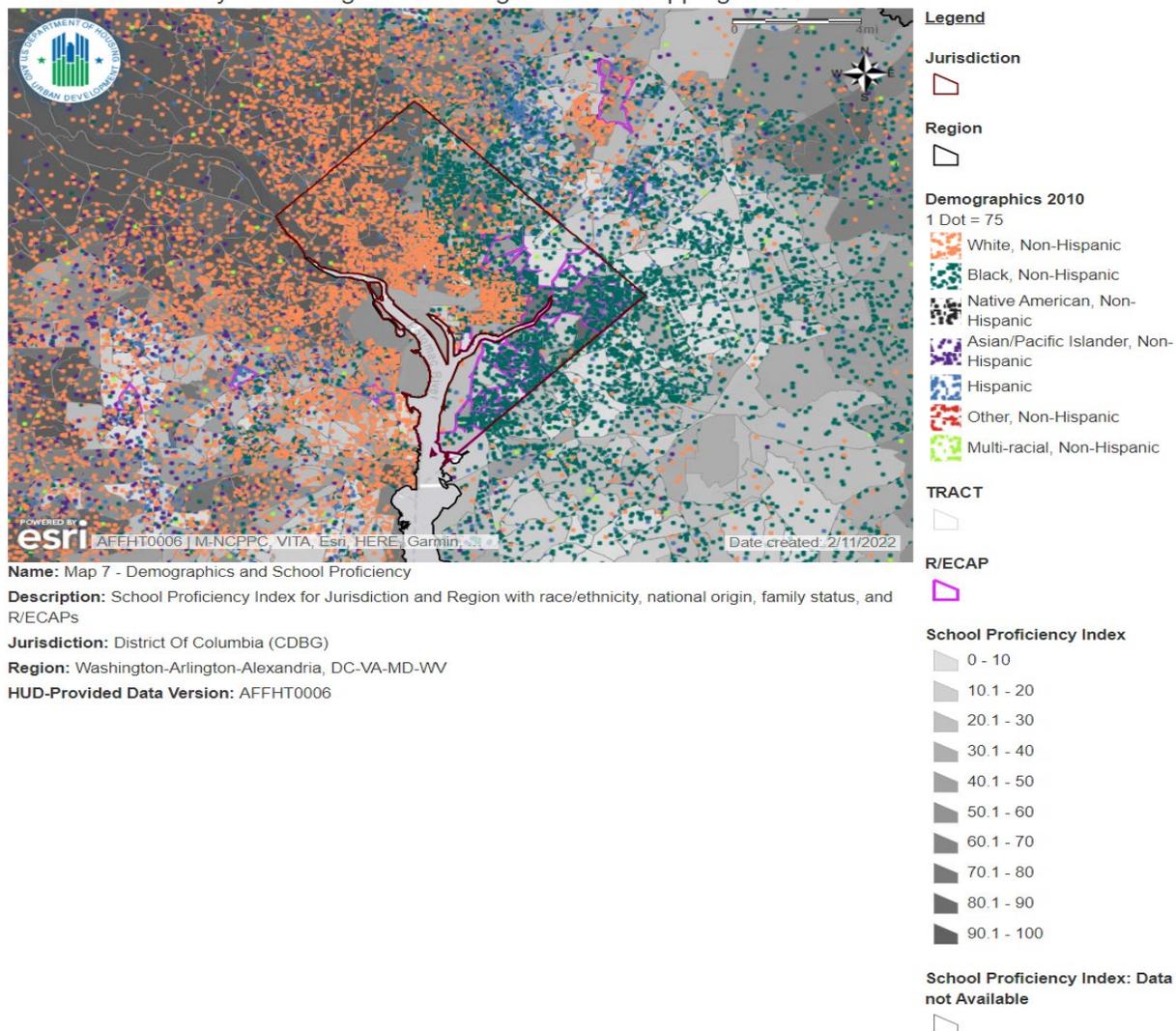
Table 16: School Proficiency Index for Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area

	District of Columbia	Region
Total Population		
White, Non-Hispanic	65.19	60.67
Black, Non-Hispanic	37.89	38.14
Hispanic	49.73	43.36

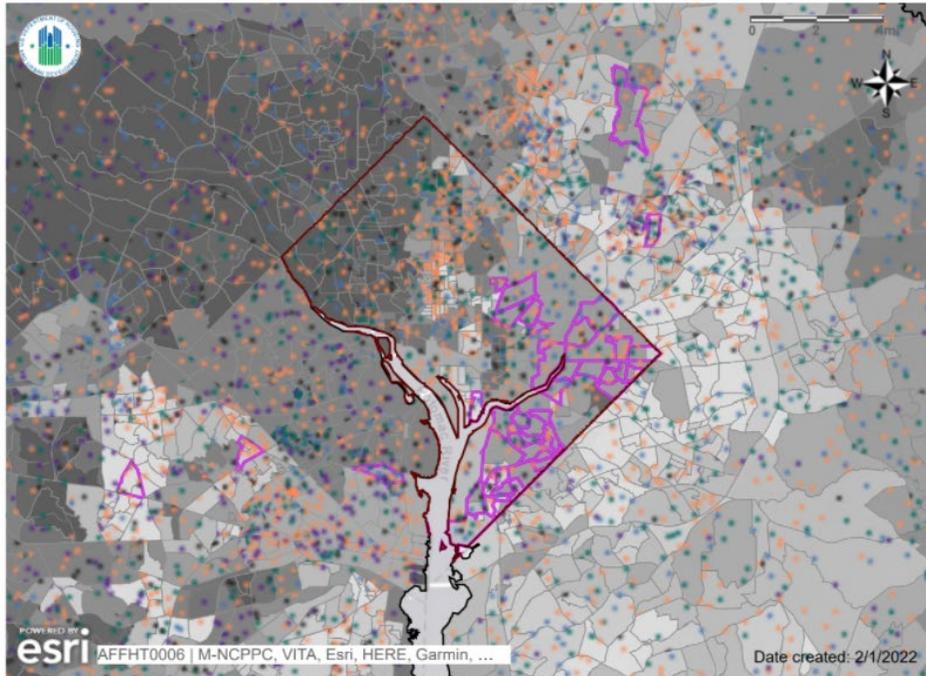
Asian or Pacific Islander, Non-Hispanic	59.66	58.09
Native American, Non-Hispanic	45.95	48.69
Population below federal poverty line		
White, Non-Hispanic	62.06	54.12
Black, Non-Hispanic	32.73	34.15
Hispanic	46.27	39.28
Asian or Pacific Islander, Non-Hispanic	60.80	53.01
Native American, Non-Hispanic	44.54	40.50

Map 26: Race/Ethnicity and School Proficiency, District of Columbia

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 27: National Origin and School Proficiency, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction

Region

National Origin [Jurisdiction] (Top 5 most populous)
 1 Dot = 75 People
 El Salvador
 Eastern Africa
 Other Central America
 Other_South_America
 Other Caribbean

TRACT

R/ECAP

School Proficiency Index

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

School Proficiency Index: Data not Available

Name: Map 7 - Demographics and School Proficiency

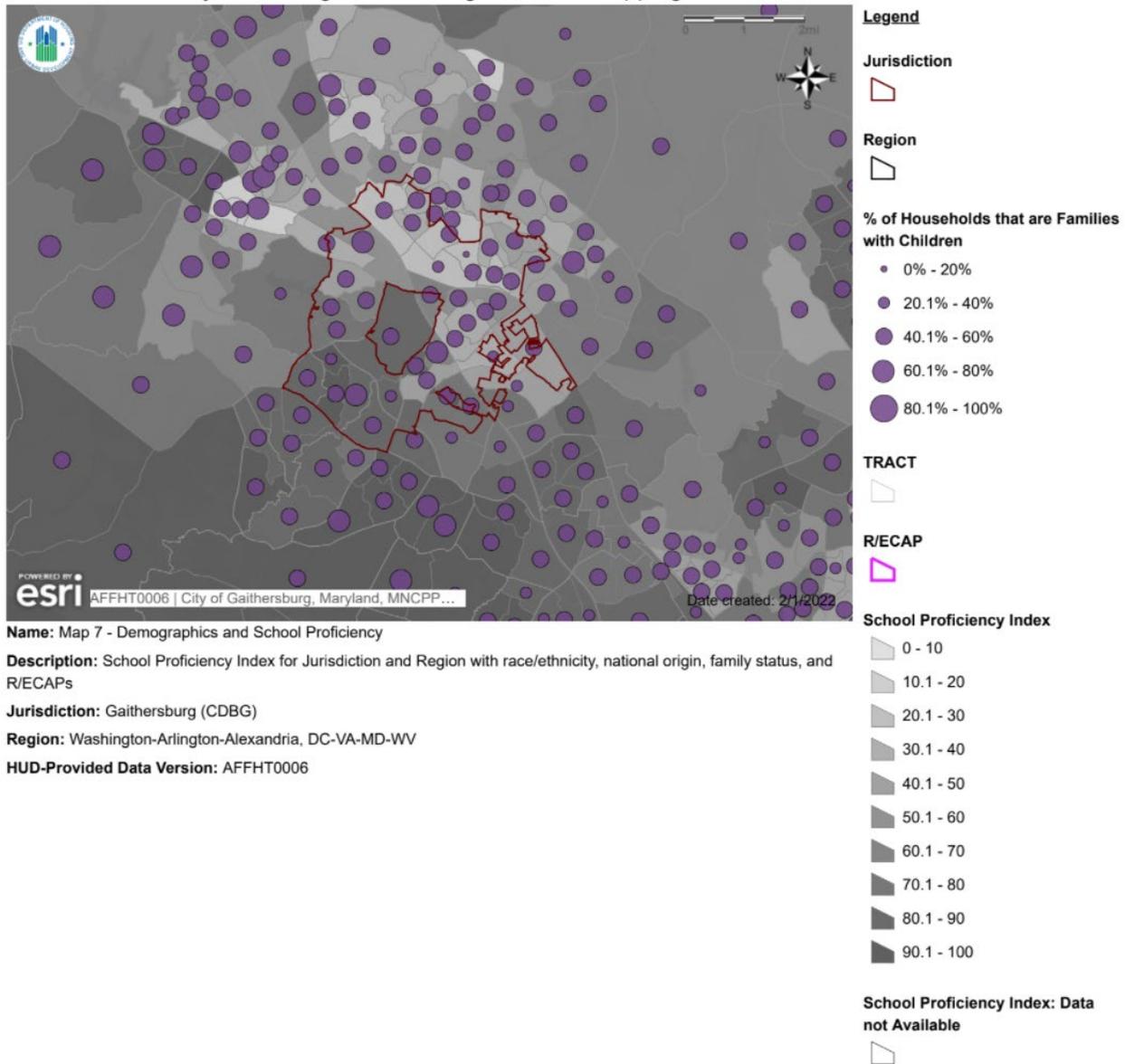
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 28: Family Status and School Proficiency, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 7 - Demographics and School Proficiency

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: Gaithersburg (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

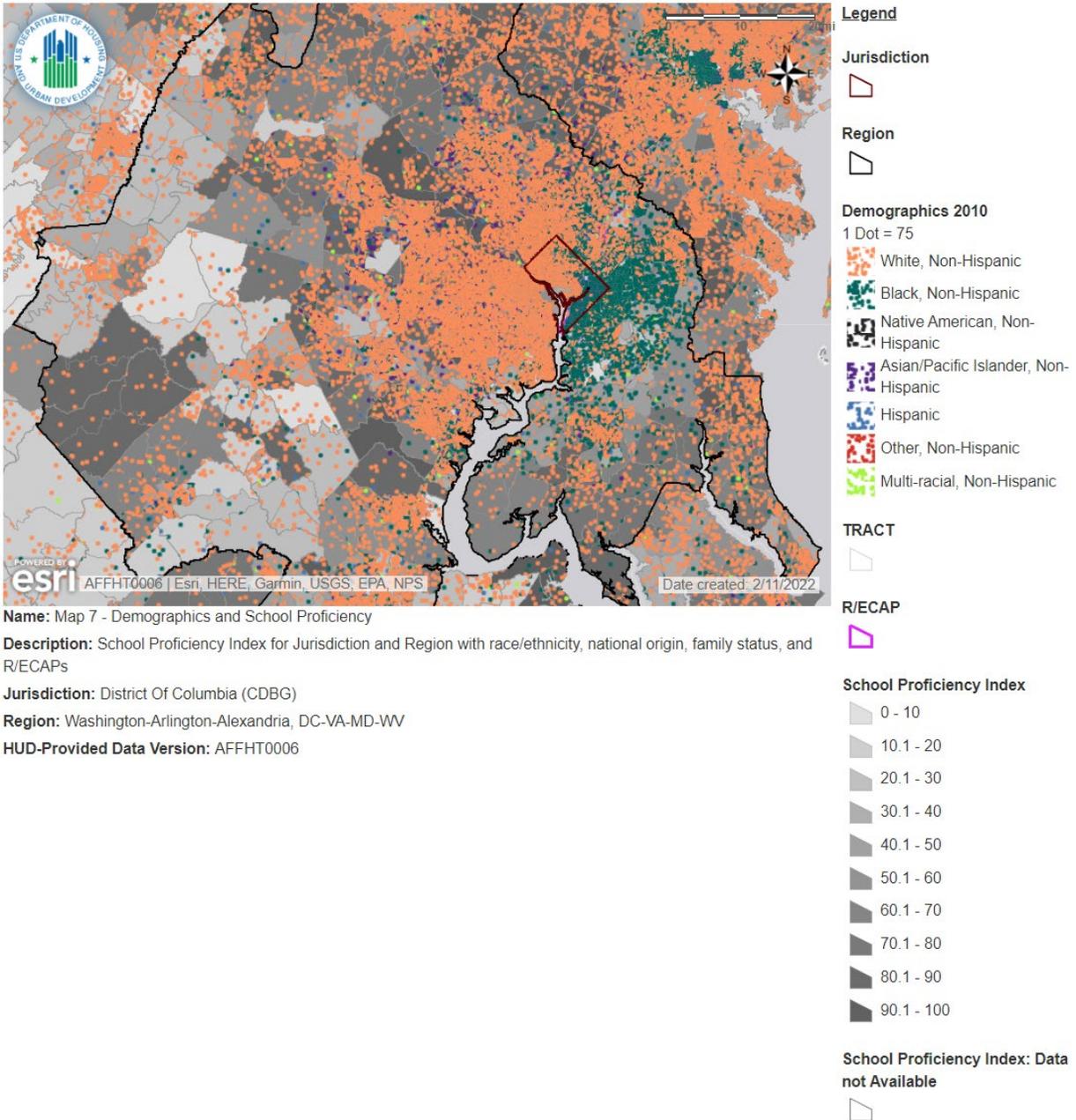
HUD-Provided Data Version: AFFHT0006

District of Columbia

In the District, Black and Hispanic residents have lower access to proficient schools than do other racial and ethnic groups. The city has a large range of School Proficiency Index scores with wide levels of access across racial and ethnic groups. This trend continues for racial and ethnic groups residing immediately outside the city as well, mimicking racial and ethnic residential patterns within the city. For example, Northwest D.C. has a high population of White residents, and this continues beyond the western border into Bethesda and Chevy Chase, Maryland, with consistently high access to proficient schools. On the other hand, Northeast D.C. contains higher populations of Black and Hispanic residents with low access to proficient schools, and this continues along the northeast border of the city into Maryland. Hispanic residents in the middle of the city, including a large Salvadoran community, have middling access to proficient schools when compared with residents of the northwest quadrant of the city. Black residents in Northeast and Southeast D.C., especially the region southeast of the

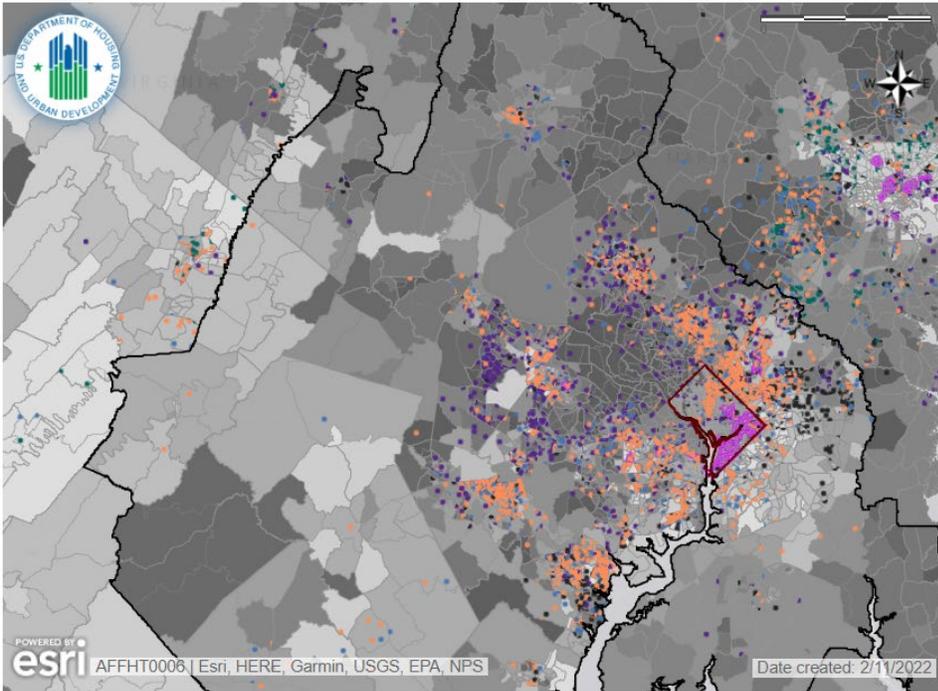
Anacostia River, have drastically lower access to proficient schools than do residents of the rest of the city. Asian residents have consistent access to proficient schools throughout the city.

Map 29: Race/Ethnicity and School Proficiency, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 30: National Origin and School Proficiency, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction
 Jurisdiction

Region
 Region

National Origin [Region] (Top 5 most populous)
 1 Dot = 75 People

-  El Salvador
-  Other South America
-  Other Central America
-  India
-  Western Africa

TRACT
 TRACT

R/ECAP
 R/ECAP

School Proficiency Index

-  0 - 10
-  10.1 - 20
-  20.1 - 30
-  30.1 - 40
-  40.1 - 50
-  50.1 - 60
-  60.1 - 70
-  70.1 - 80
-  80.1 - 90
-  90.1 - 100

School Proficiency Index: Data not Available
 School Proficiency Index: Data not Available

Name: Map 7 - Demographics and School Proficiency

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

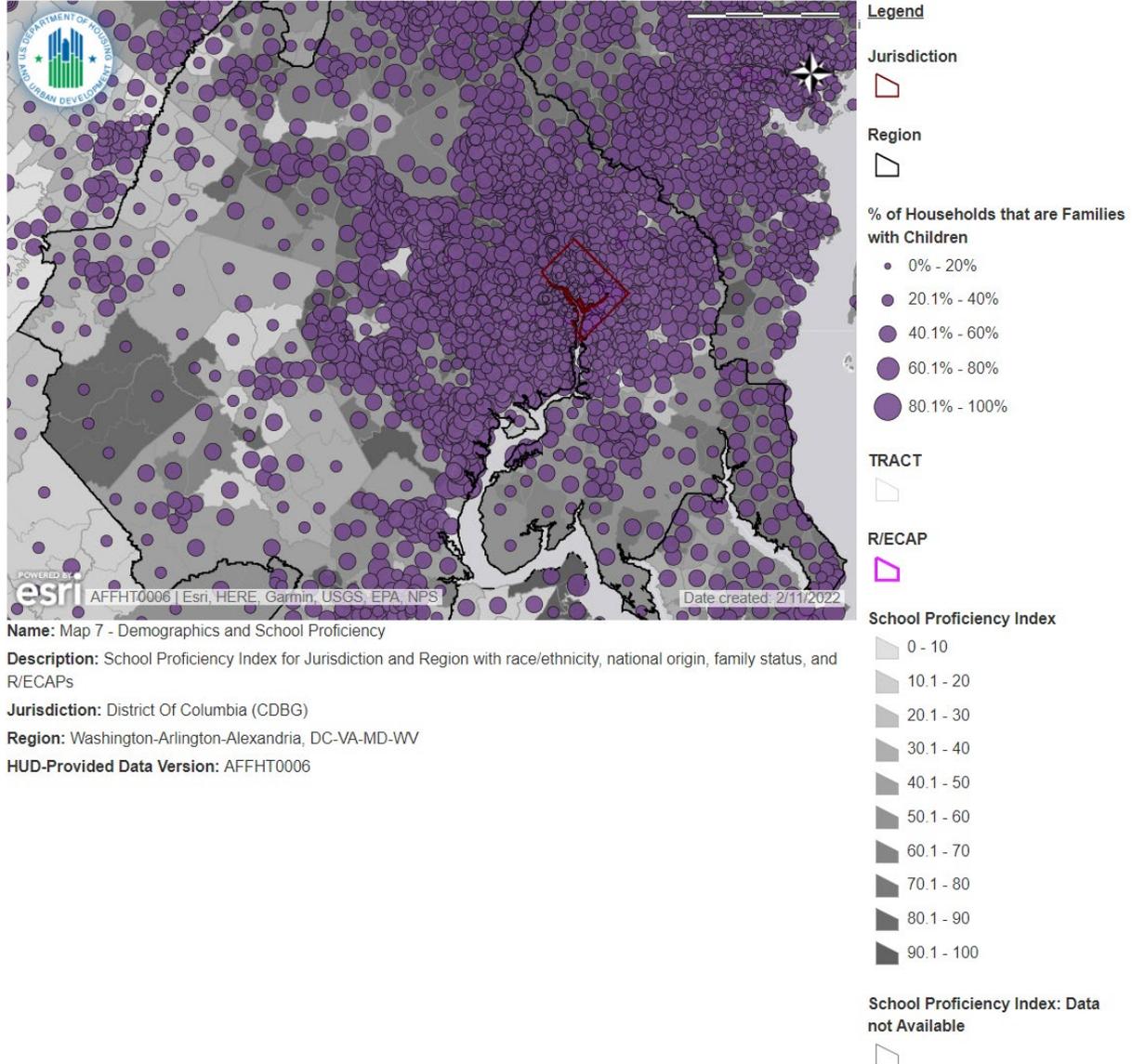
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 31: Family Status and School Proficiency, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



In general, White residents across the region have the most access to proficient schools, followed by Asian American residents. This is true to a slightly lesser extent for exclusively the population below the poverty line. Native American residents across the region have a moderate level of access to proficient schools, though it decreases for Native Americans living under the poverty line. Black and Hispanic residents throughout the region have the least access to proficient schools, especially those living below the poverty line.

ii. Describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

District of Columbia

The District’s patterns of access to proficient schools are linked to broader residential patterns. As explored previously, the District has distinct patterns of segregation, with White residents being predominantly located in the northwest section of the city and surrounding the National Mall, and

Black residents in Northeast and Southeast D.C. This pattern of segregation is strongly linked to access to proficient schools within the city borders.

Northwest D.C. has relatively high levels of access to proficient schools, with ranges of School Proficiency Index scores from 70 to 100 in most parts. This region also has higher populations of White and Asian American residents, especially west of Rock Creek Park, as well as larger numbers of families with children. Lower index values start to emerge in the Crestwood, Brightwood, and Mount Pleasant neighborhoods.

The center of the city, along the Metro's Green Line and including the 16th Street Heights and Brightwood neighborhoods, has lower levels of access to proficient schools, with School Proficiency Index scores ranging from 20 to 50. This affects the large population of Salvadoran residents in the area.

Downtown, in the areas surrounding the National Mall, access to proficient schools is generally high, with the exception of the Chinatown area (though this neighborhood does have a larger number of families with children than most of the surrounding neighborhoods). The Capitol Hill neighborhood to the east of the National Mall also has higher levels of access to proficient schools. Northeast and Southeast D.C. have the lowest access to proficient schools in the city, with some exceptions. The easternmost neighborhoods of the city, including Marshall Heights and Benning Ridge, have School Proficiency scores in the 60s. The Fairlawn and Hillcrest neighborhoods have similar levels of access. More families with children reside in this area of the city.

The neighborhoods of University Heights, Brentwood, and Edgewood in Northeast D.C. have higher levels of access to proficient schools than do surrounding areas.

Region

Disparities in access to proficient education correlate with residential living patterns in the region. Access to proficient schools is much higher in suburban areas, particularly in Loudoun, Fairfax, and Montgomery counties. These areas are disproportionately White, and to a lesser extent, Asian American. In contrast, urban areas with low levels of access to proficient schools are consistently home to larger numbers of Black and Hispanic residents. This includes the District of Columbia and the urban portions of Alexandria and Arlington. But even within these urban areas, where people of color comprise a majority of the population, access to proficient schools is heavily correlated with race and ethnicity.

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

District of Columbia

Displacement of low-income families and communities of color not only has impacts on residential patterns but also has ripple effects on areas such as education. During the community participation process, residents expressed many hardships related to housing and also mentioned that moving would require them to miss out on better schools in the District as well as other free educational programs offered in the city. In particular, there was a desire to retain access to English learning classes.

DC Public Schools has an Equity and Strategy Programming Team aimed at eliminating opportunity gaps, interrupting institutional bias, and removing barriers to academic and social success, particularly

for students of color. This, however, does not seem to address the larger, underlying causes of racial disparities in schools, like those explained above.

b. Disparities in Access to Opportunity—Employment

Access to employment at a livable wage is an integral component of broader access to opportunity. Where one lives can affect one’s access to and the quality of employment opportunities. This can happen both through proximity of residential areas to places with high concentrations (or low concentrations) of jobs and through barriers to residents of particular neighborhoods accessing jobs, even when they are close by. The analysis in this section is based on a review of two data indicators for each jurisdiction: the Labor Market Index and the Jobs Proximity Index. The Labor Market Index measures, by census tract in a jurisdiction, the level of engagement residents within that tract have in the labor force. Values range from 0 to 100. The higher the score, the higher the rates of employment in that particular area. The Jobs Proximity Index measures, by census tract, the accessibility of employment opportunities for that tract’s residents. Values range from 0 to 100. The higher the score, the more access residents from that area have to employment opportunities.

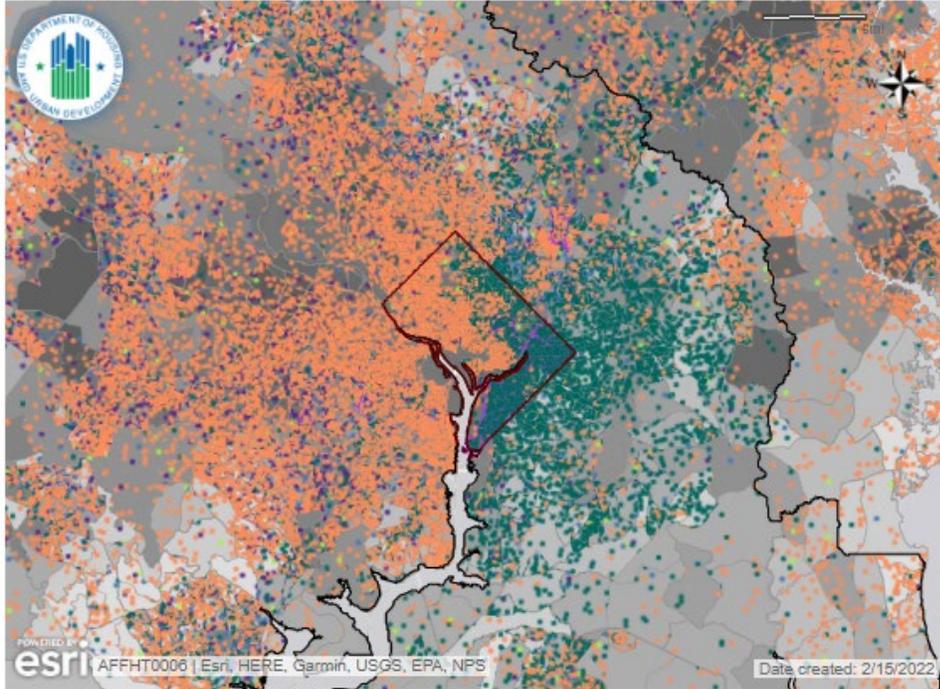
i. Describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

Table 17: Labor Market and Jobs Proximity Indexes

Labor Market Index	District of Columbia	Region
Total Population		
White, Non-Hispanic	91.67	82.91
Black, Non-Hispanic	40.43	62.67
Hispanic	76.47	74.49
Asian or Pacific Islander, Non-Hispanic	88.05	86.47
Native American, Non-Hispanic	60.32	72.84
Population below federal poverty line		
White, Non-Hispanic	91.00	76.55
Black, Non-Hispanic	34.68	51.91
Hispanic	74.83	69.89
Asian or Pacific Islander, Non-Hispanic	91.97	83.78
Native American, Non-Hispanic	63.14	75.77
Job Proximity Index	District of Columbia	Region

Total Population		
White, Non-Hispanic	89.90	48.26
Black, Non-Hispanic	63.94	42.42
Hispanic	80.38	46.50
Asian or Pacific Islander, Non-Hispanic	90.47	53.37
Native American, Non-Hispanic	75.32	44.20
Population below federal poverty line		
White, Non-Hispanic	90.24	50.51
Black, Non-Hispanic	64.33	50.96
Hispanic	80.00	46.40
Asian or Pacific Islander, Non-Hispanic	93.44	58.27
Native American, Non-Hispanic	81.92	55.30

Map 32: Demographics and Job Proximity (Race/Ethnicity), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction

Region

Demographics 2010
 1 Dot = 75

- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

TRACT

R/ECAP

Jobs Proximity Index

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Jobs Proximity Index: Data not Available

Name: Map 8 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

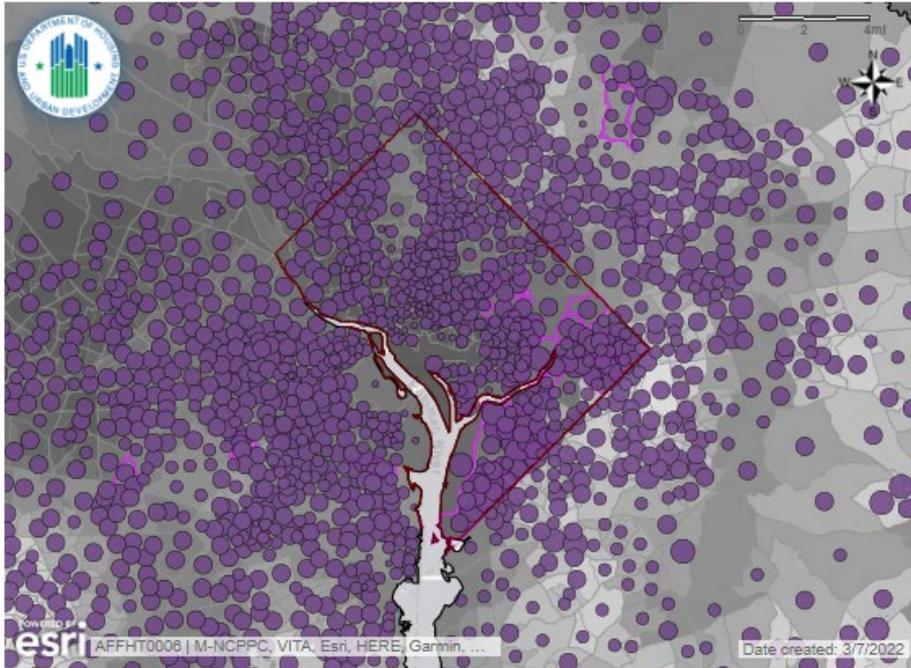
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 33: Demographics and Job Proximity (National Origin), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 34: Demographics and Job Proximity (Familial Status), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction

Region

% of Households that are Families with Children

- 0% - 20%
- 20.1% - 40%
- 40.1% - 60%
- 60.1% - 80%
- 80.1% - 100%

TRACT

R/ECAP

Jobs Proximity Index

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Jobs Proximity Index: Data not Available

Name: Map 8 - Demographics and Job Proximity

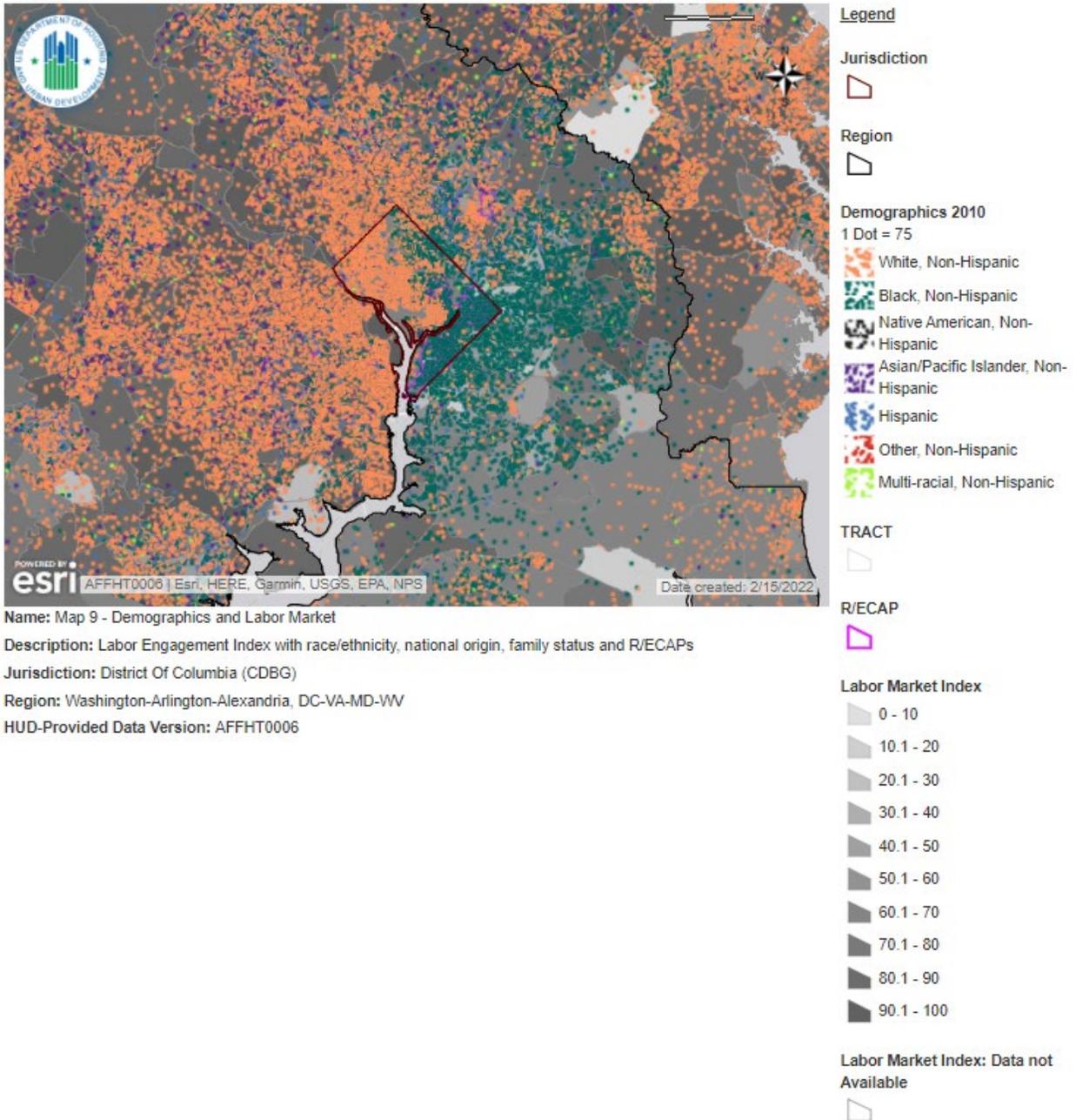
Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

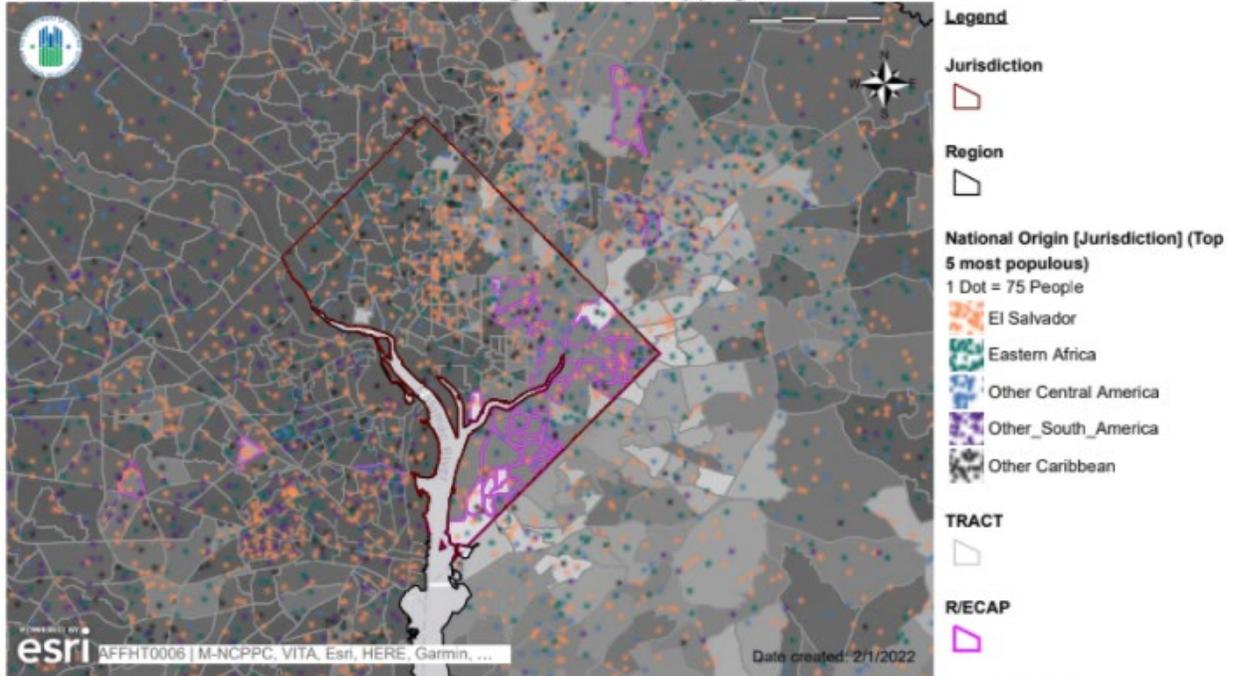
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 35: Demographics and Labor Market (Race/Ethnicity), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 36: Demographics and Labor Market (National Origin), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 9 - Demographics and Labor Market

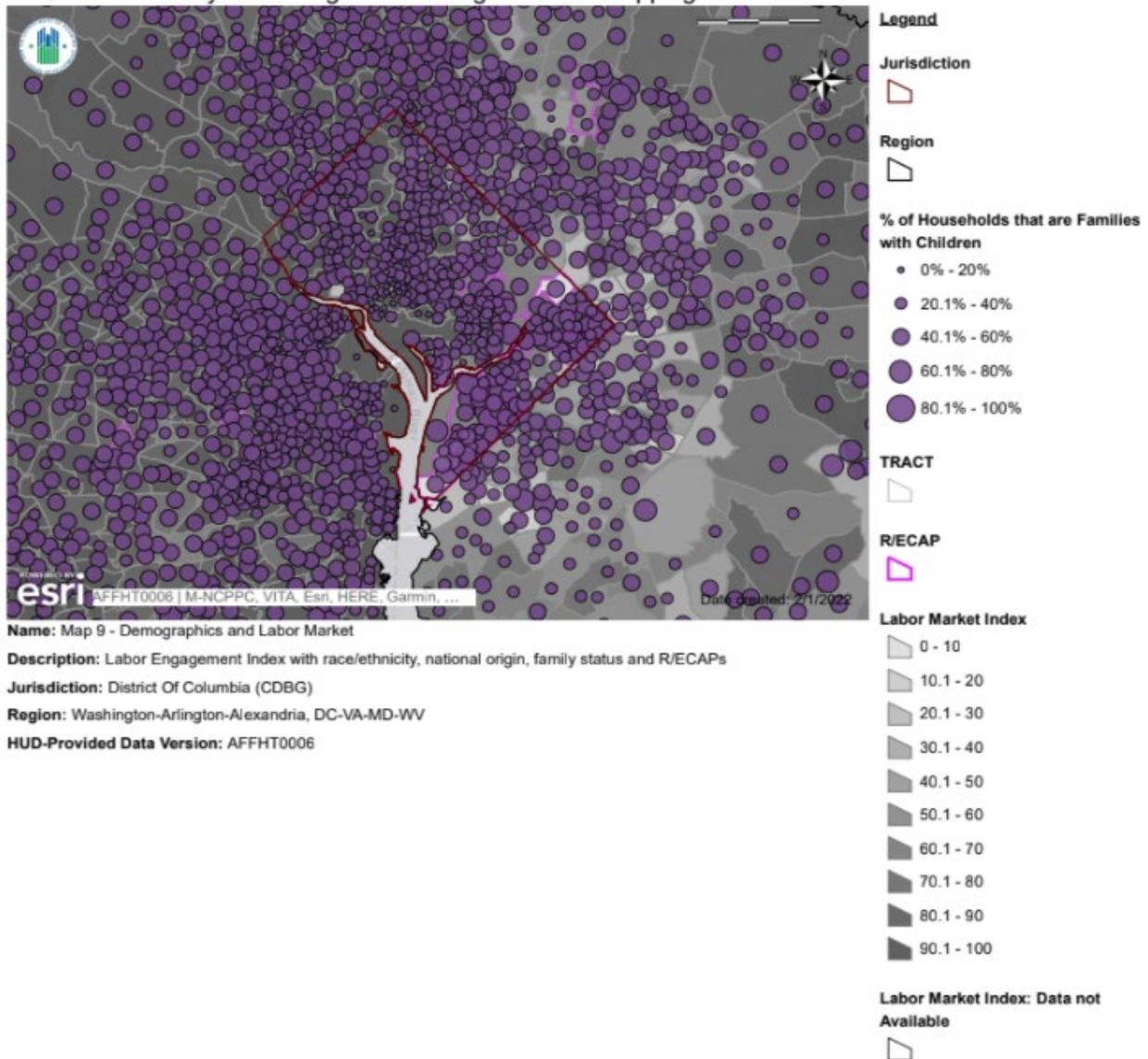
Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 37: Demographics and Labor Market (Familial Status), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



District of Columbia

Racial and ethnic disparities in job engagement are significant in the District. Although the index value for White residents is fairly high at 91, the index value for Black residents is 40. The index value for Native American residents is notably lower at 60.32. In addition, the index value for Black residents who live below the poverty line shows a steeper decline, dropping from 40 to 34, than the value for any other group. Needless to say, Black residents who live below the poverty line have the lowest degree of access to neighborhoods with strong labor market engagement overall, and higher-income Black residents also have the least access of any other group. Some racial and ethnic disparities in jobs proximity values, although not to the extent exhibited in the Labor Market Index, parallel those found for job engagement. The jobs proximity value for White residents is highest, at 89, while that for Black residents is much lower at 63. The index number for Native American residents in comparison to other groups is lower. Economic status does not appear to be a significant factor in determining jobs proximity values; however, the jobs proximity values for Native American, Asian American, and Hispanic residents below the poverty line saw a marginal increase compared to the overall index values for their populations.

Map 38: Demographics and Job Proximity (Race/Ethnicity), Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction

Region

TRACT

R/ECAP

Jobs Proximity Index

	0 - 10
	10.1 - 20
	20.1 - 30
	30.1 - 40
	40.1 - 50
	50.1 - 60
	60.1 - 70
	70.1 - 80
	80.1 - 90
	90.1 - 100

Jobs Proximity Index: Data not Available

Name: Map 8 - Demographics and Job Proximity

Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 39: Demographics and Job Proximity (National Origin), Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction

Region

National Origin [Region] (Top 5 most populous)
 1 Dot = 75 People

- El Salvador
- Other South America
- Other Central America
- India
- Western Africa

TRACT

R/ECAP

Jobs Proximity Index

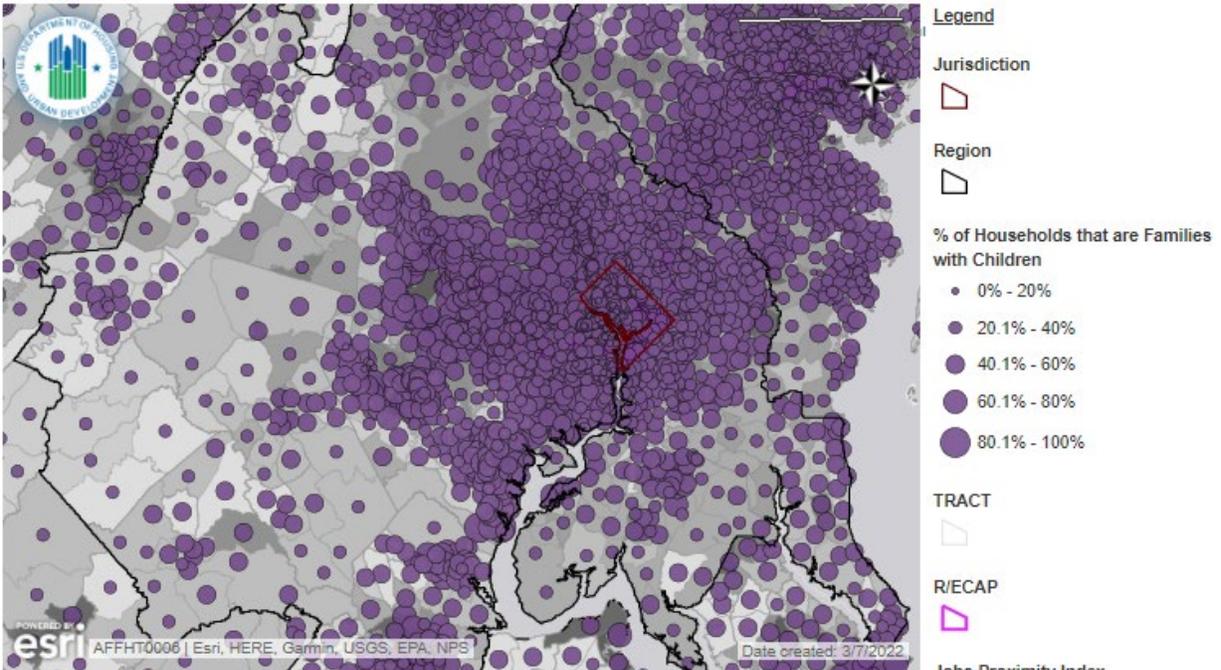
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Jobs Proximity Index: Data not Available

Name: Map 8 - Demographics and Job Proximity
Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: District Of Columbia (CDBG)
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV
HUD-Provided Data Version: AFFHT0006

Map 40: Demographics and Job Proximity (Familial Status), Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction

Region

% of Households that are Families with Children

- 0% - 20%
- 20.1% - 40%
- 40.1% - 60%
- 60.1% - 80%
- 80.1% - 100%

TRACT

R/ECAP

Jobs Proximity Index

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Jobs Proximity Index: Data not Available

Name: Map 8 - Demographics and Job Proximity

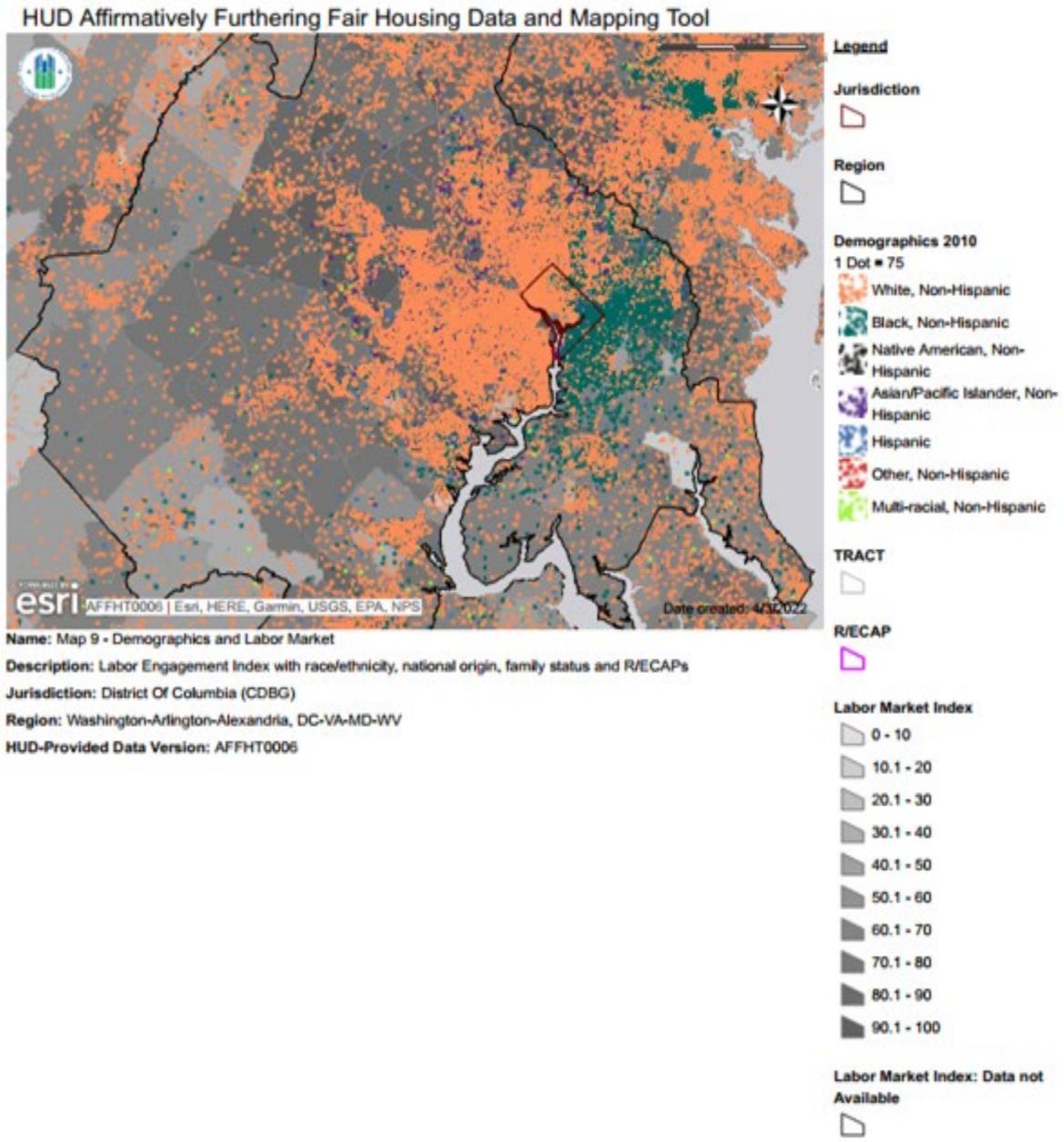
Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

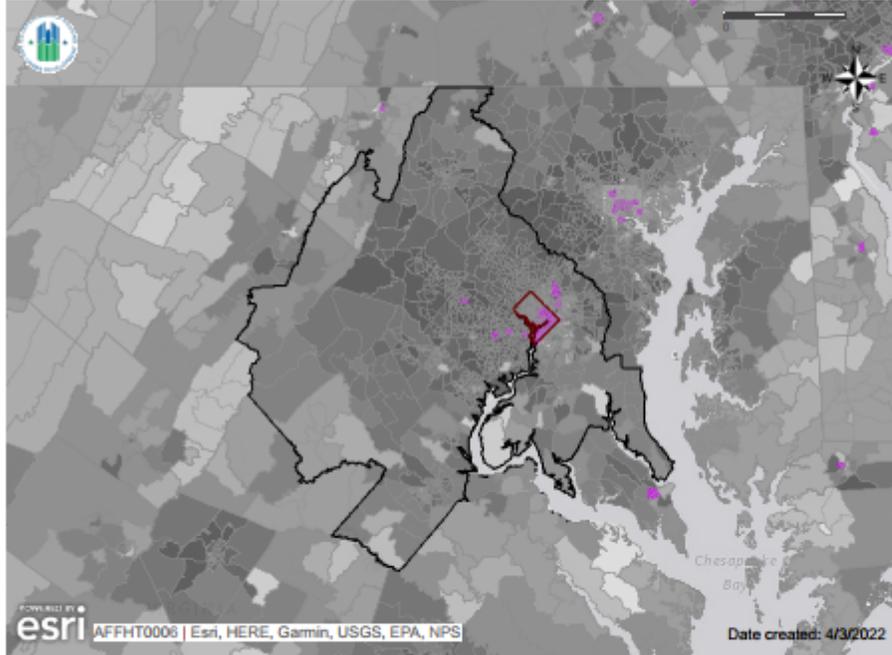
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 41: Demographics and Labor Market (Race/Ethnicity), Region



Map 42: Demographics and Labor Market (National Origin), Region
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



- Legend**
- Jurisdiction**

 - Region**

 - National Origin [Region] (Top 5 most populous)**
 1 Dot = 75 People
 -  El Salvador
 -  Other South America
 -  Other Central America
 -  India
 -  Western Africa
 - TRACT**

 - R/ECAP**

 - Labor Market Index**
 -  0 - 10
 -  10.1 - 20
 -  20.1 - 30
 -  30.1 - 40
 -  40.1 - 50
 -  50.1 - 60
 -  60.1 - 70
 -  70.1 - 80
 -  80.1 - 90
 -  90.1 - 100
 - Labor Market Index: Data not Available**


Name: Map 9 - Demographics and Labor Market

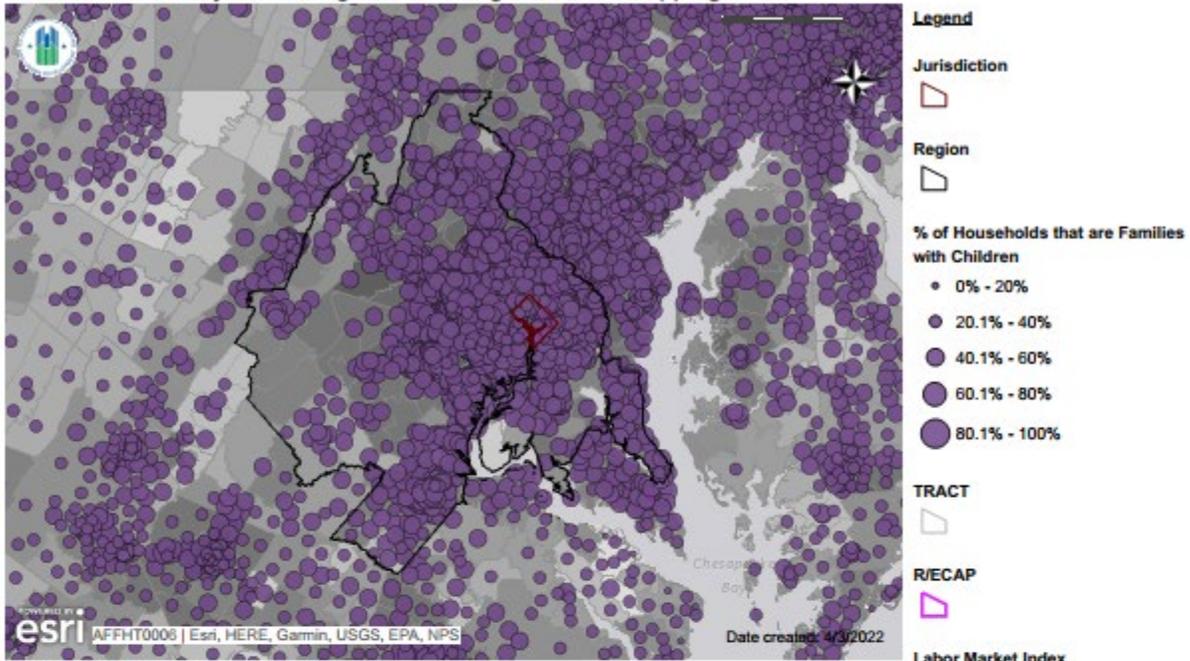
Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 43: Demographics and Labor Market (Familial Status), Region
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 9 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Region

The region as a whole has fairly high job engagement values across all racial groups, however, clear racial disparities in job engagement are present. This pattern is consistent with the jurisdictional trends in the area. Regionally, the Labor Market Index values are much higher for Asian American and White residents than for Black, Hispanic, and Native American residents. When economic status is considered, there is some slight variation in these disparities. Labor engagement values continue to be comparatively lower for Black and Hispanic residents, while they are higher for White, Asian American, and Native American residents. When the Labor Market Index value for Asian American residents is compared with the value for Black residents, the disparity is stark—a difference of approximately 20 points. This regional value difference is much more pronounced than the differences in index values within the smaller jurisdictions. Job proximity values for the region are moderate but veer toward the lower end of the index range. The index values tend to be higher for residents who live in the District or in counties adjacent than for those further away. In part, this can be attributed to the geographic distance of jurisdictions from the hub of labor activity. Additionally, there are more transportation options toward the center of D.C. than there are in the outer regions of the area. Jobs proximity values for residents below the poverty line change very little and, in some instances, the values increase for certain racial and ethnic groups.

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

District of Columbia

The Labor Market Index is starkly divided between Northwest D.C. and the remainder of the city. Areas that rank highest on the Labor Market Index are located almost exclusively in the northwest quadrant of D.C., where almost no publicly supported housing developments are located. The remaining areas of the District consistently rank lower on the Labor Market Index and have much more publicly supported housing.

Region

Job engagement is higher in the jurisdictions that border the District as well as the more outlying jurisdictions. In contrast, the District has lower Labor Market Index values. The trend for jobs proximity data is the inverse. As previously noted, because D.C. has the most extensive transportation system, job proximity values are higher simply because commuter times are shorter for those living closer to D.C. There is also a small pocket in Prince William County on the southern border, near a major military installation, with higher proximity values than the rest of the region. The residential patterns do not show a correlation between job proximity values and race. In the D.C. area and its borders, White residents are primarily located in the north and on the western side, and a larger proportion of Black residents reside in southeast D.C. and adjoining Prince George's County, but the job proximity values are roughly the same.

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

As of March 2022, the D.C. unemployment rate of 6 percent is one of the highest in the region.⁵ Unemployment rates differ according to race in the District, with White and Asian populations having the lowest unemployment rates at 2.7 percent and 2.9 percent, respectively.⁶ In contrast, Black and Native American populations have considerably higher unemployment rates at 13.2 percent and 8.8 percent, respectively.⁷

Racial disparities in employment by job sector exist also. Of White employees, 82.1 percent work in management, while only 47.2 percent of Black employees do.⁸ By contrast, only 6 percent of White employees work in service, compared to 21.7 percent of Black employees. Similarly, 9.5 percent of White employees work in sales and office occupations, while 19.8 percent of Black employees do. The same trend holds for the natural resources and production sectors, with higher percentages of Black employees present than White employees.

These occupational disparities translate to racial disparities in wages and benefits. Although the median income for households in the District is \$92,266, the median income for White households is \$149,734, while for Black households, the median income is \$48,652, approximately a third of the income earned by their White counterparts.⁹

However, according to the D.C. Fiscal Policy Institute, these disparities are not solely a reflection of educational attainment or degree of skills training. Rather, these disparities are more the product of discriminatory impediments including discriminatory hiring, compensation, promotion, and termination practices; educational racism; restricted access to capital; inequities in transportation access; and the overcriminalization of Black residents.¹⁰ To remediate these barriers, the District should require employer training on racial bias in hiring and retention practices, prioritize business loans for Black small businesses, and expand opportunities to seal records and support the reentry of individuals who are incarcerated into the labor market, to name a few priorities.

Currently, the District offers several job training programs to assist local residents with securing employment through its Department of Employment Services. The On the Job training program partners with employers who agree to train, mentor, and hire candidates as they participate in the program. To incentivize employer participation, the program reimburses employers by subsidizing the wages of employee participants.¹¹ Another program that operates similarly is the Project Empowerment program designed specifically for vulnerable populations who meet certain criteria, including three of the following: (1) basic skills deficiency, (2) lack of secondary education credential, (3) documented history of substance abuse, (4) homelessness, (5) history of job cycling, and (6) felony conviction or prior incarceration.¹² This program provides a holistic model of supports by offering participants legal support, health services, financial support, and entrepreneurship counseling. Several nonprofits also offer affordable job training programs, for example, the So Others May Eat program, offering a tuition-free program for careers in health care and the building trades as well as the DC Central Kitchen, a training program for previously incarcerated adults for careers in the food industry.¹³

c. Disparities in Access to Opportunity—Transportation

i. Describe any disparities in access to transportation in the jurisdiction and region.

The Low Transportation Cost Index and Transit Trips Index are used to measure access to transportation within a location. The Low Transportation Cost Index measures access to low-cost transportation services, and the Transit Trips Index measures how often residents take transit trips. The Index scores range from 0–100. A higher score correlates to greater transportation access.

Table 18: Transit Trips and Low Transportation Cost Indices

Transit Trips Index	District of Columbia	Region
Total Population		

White, Non-Hispanic	92.71	64.69
Black, Non-Hispanic	91.55	72.81
Hispanic	93.58	74.25
Asian or Pacific Islander, Non-Hispanic	93.05	73.66
Native American, Non-Hispanic	92.38	65.28
Population below federal poverty line		
White, Non-Hispanic	93.23	64.97
Black, Non-Hispanic	91.95	80.43
Hispanic	93.66	77.28
Asian or Pacific Islander, Non-Hispanic	94.23	77.63
Native American, Non-Hispanic	93.15	75.29
Low Transportation Cost Index	District of Columbia	Region
Total Population		
White, Non-Hispanic	97.00	87.43
Black, Non-Hispanic	96.88	91.18
Hispanic	97.50	91.47
Asian or Pacific Islander, Non-Hispanic	97.22	89.94
Native American, Non-Hispanic	97.06	88.87
Population below federal poverty line		
White Non-Hispanic	97.49	88.80
Black, Non-Hispanic	97.17	94.08
Hispanic	97.68	92.91
Asian or Pacific Islander, Non-Hispanic	98.09	89.94
Native American, Non-Hispanic	97.14	88.87

Map 44: Demographics and Transit Trips (Race/Ethnicity), District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 10 - Demographics and Transit Trips

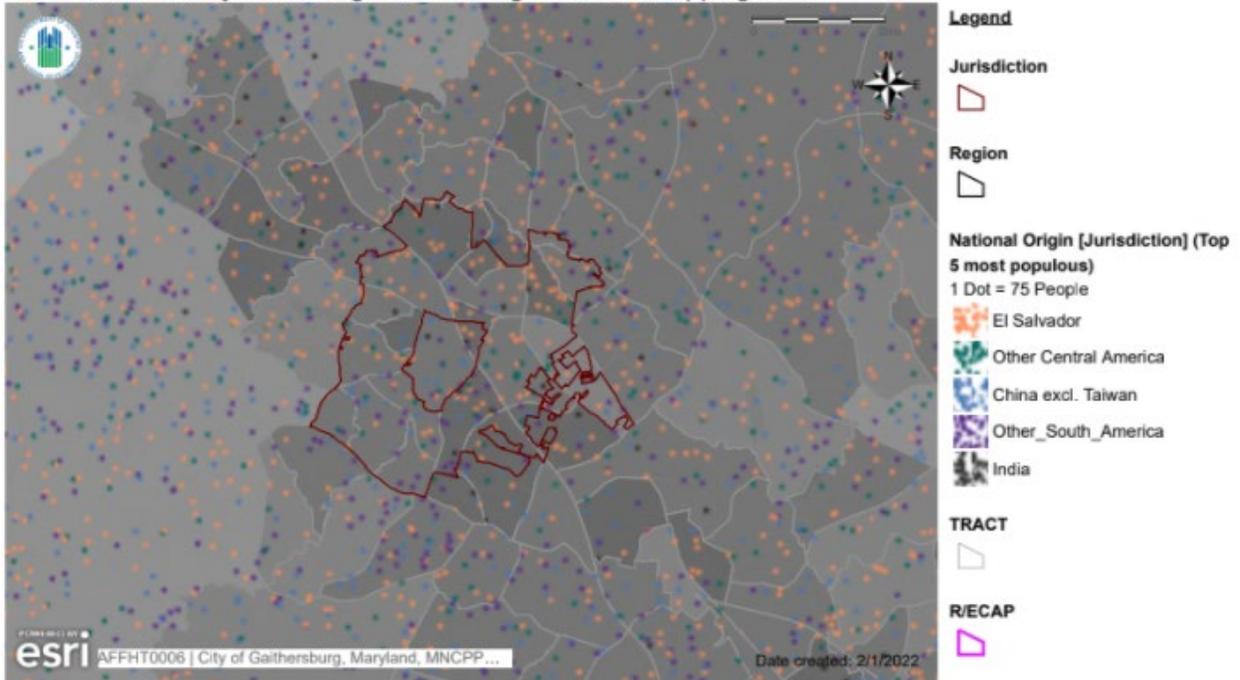
Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Gaithersburg (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 45: Demographics and Transit Trips (National Origin), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 10 - Demographics and Transit Trips

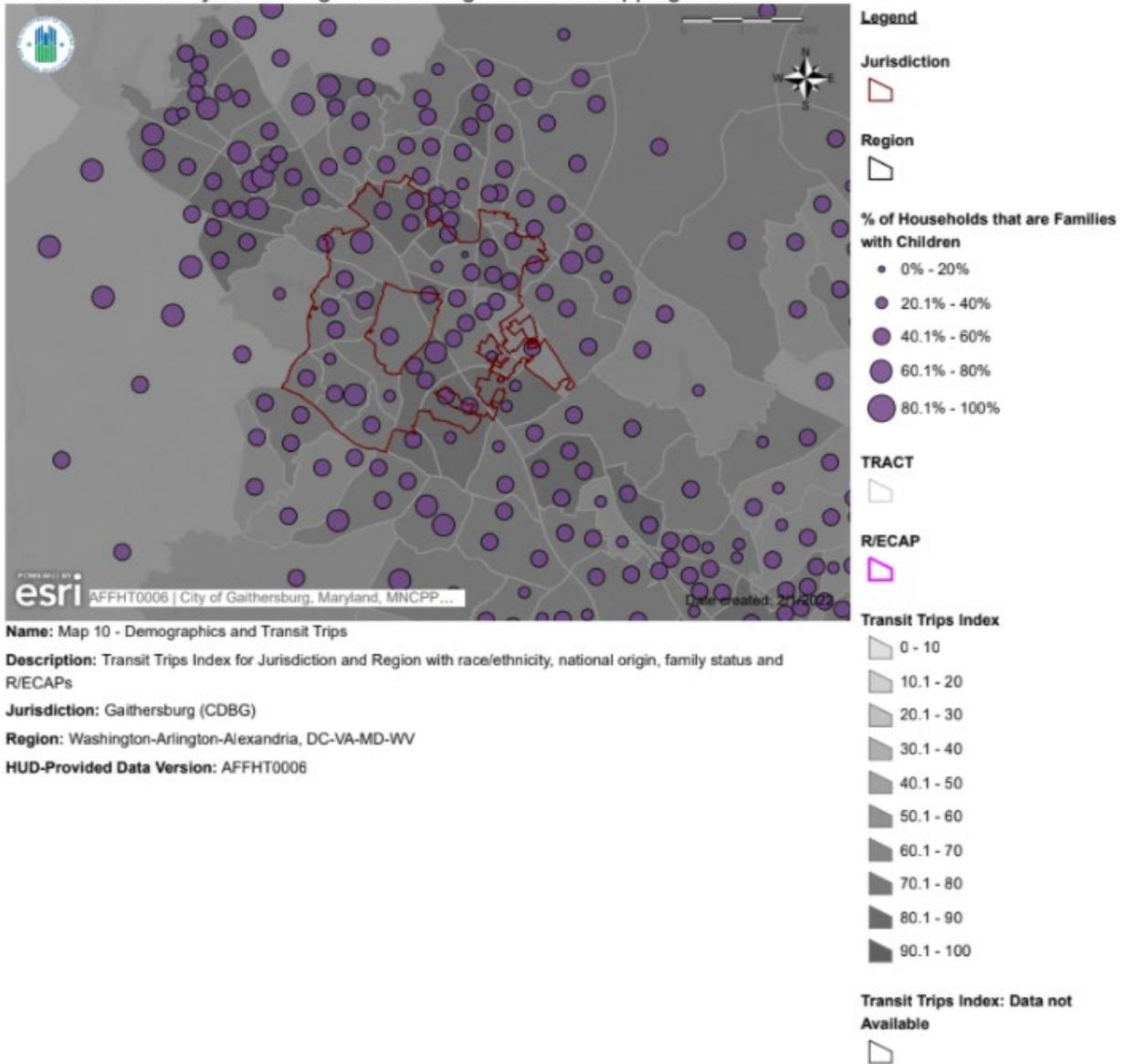
Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Gaithersburg (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

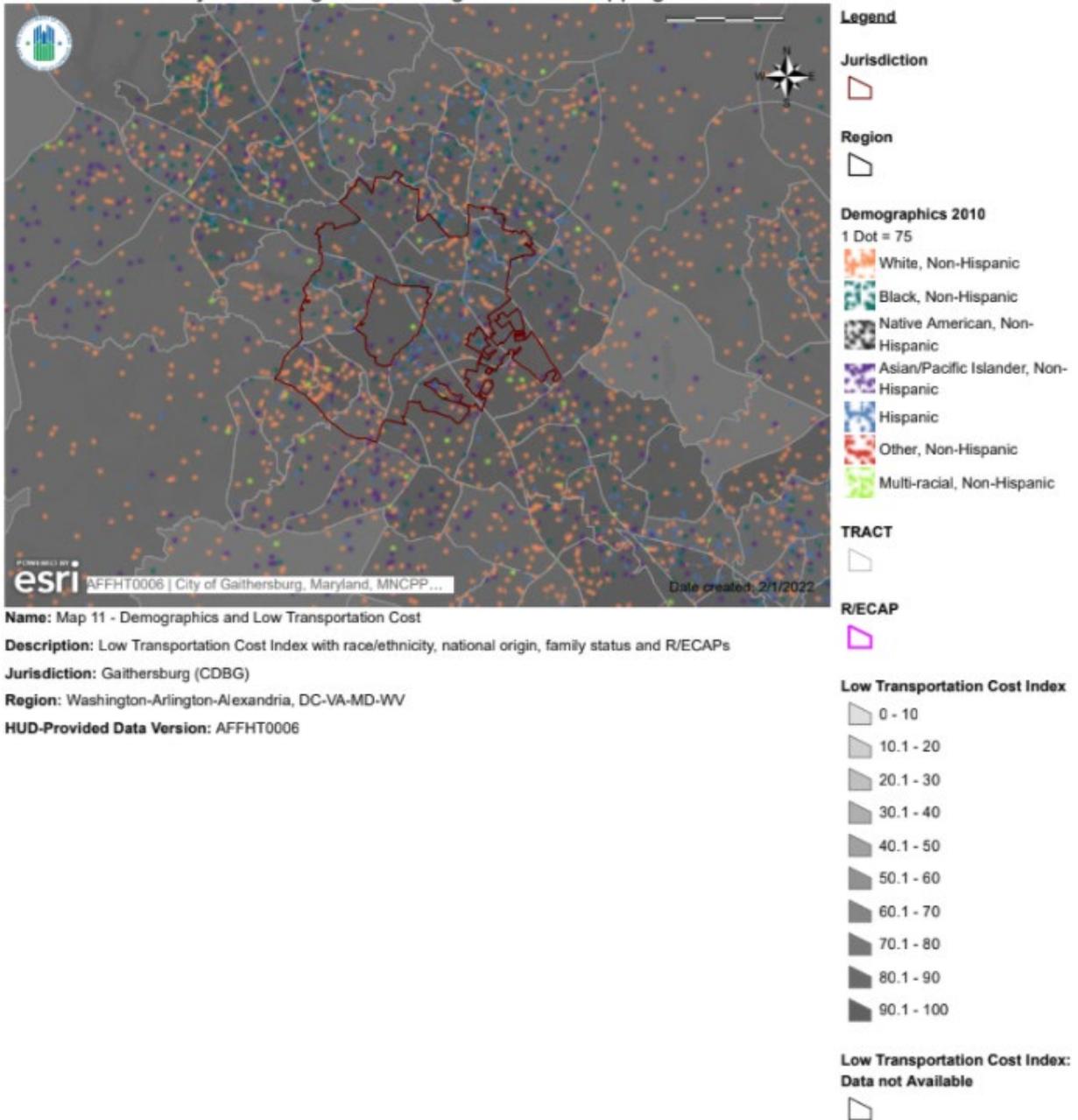
HUD-Provided Data Version: AFFHT0006

Map 46: Demographics and Transit Trips (Familial Status), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

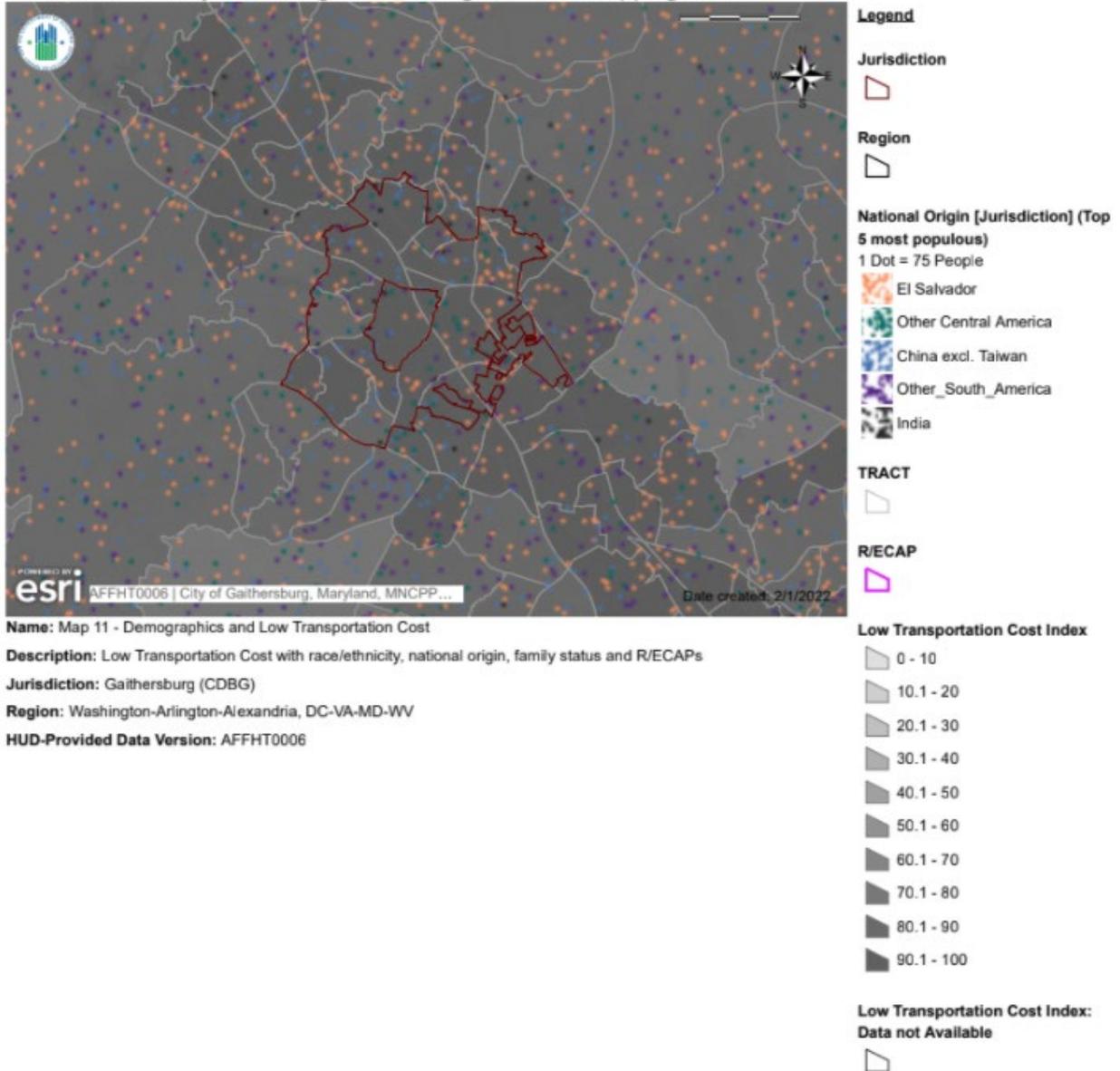


Map 47: Demographics and Low Transportation Cost (Race/Ethnicity), District of Columbia

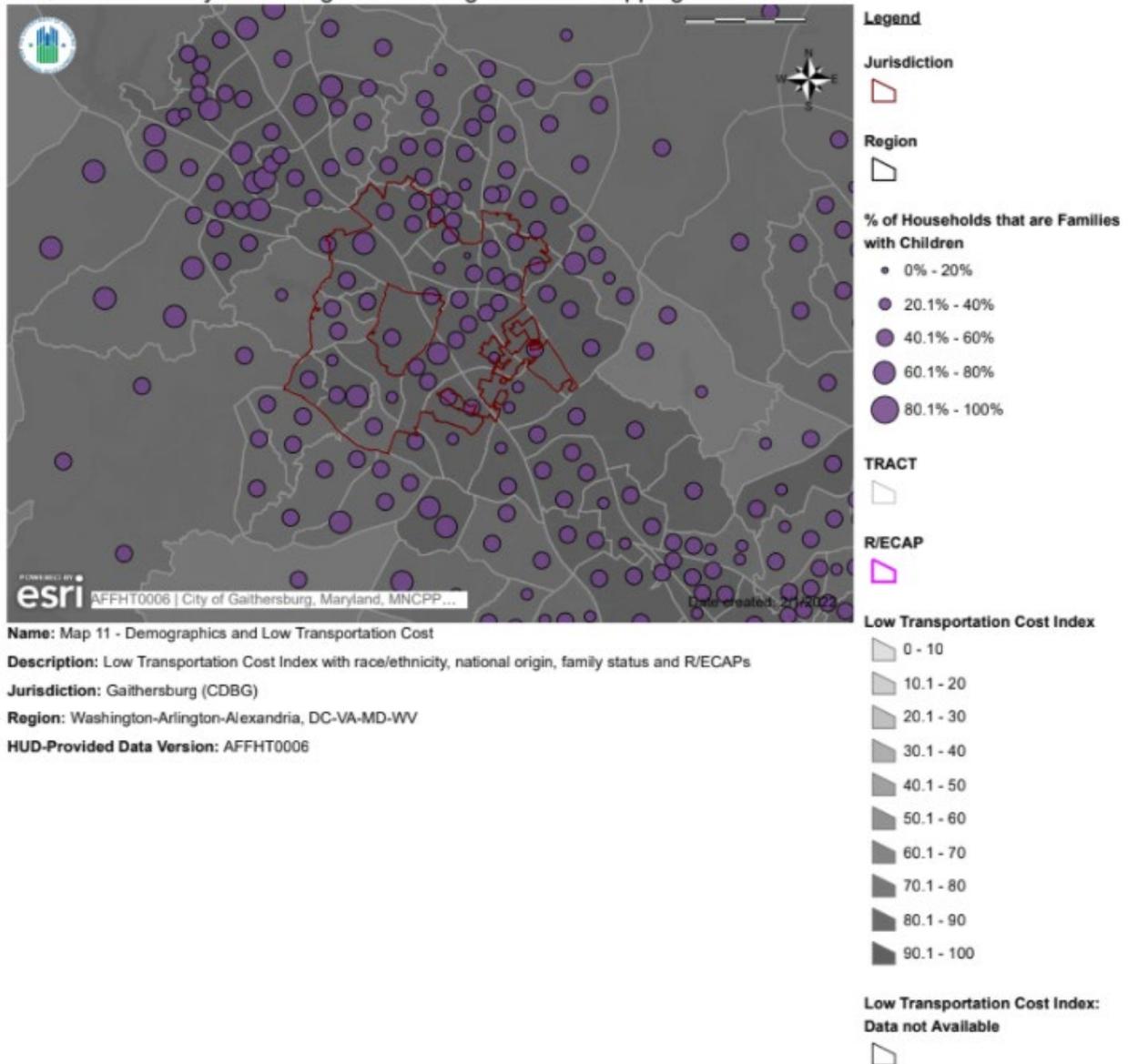
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 48: Demographics and Low Transportation Cost (National Origin), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



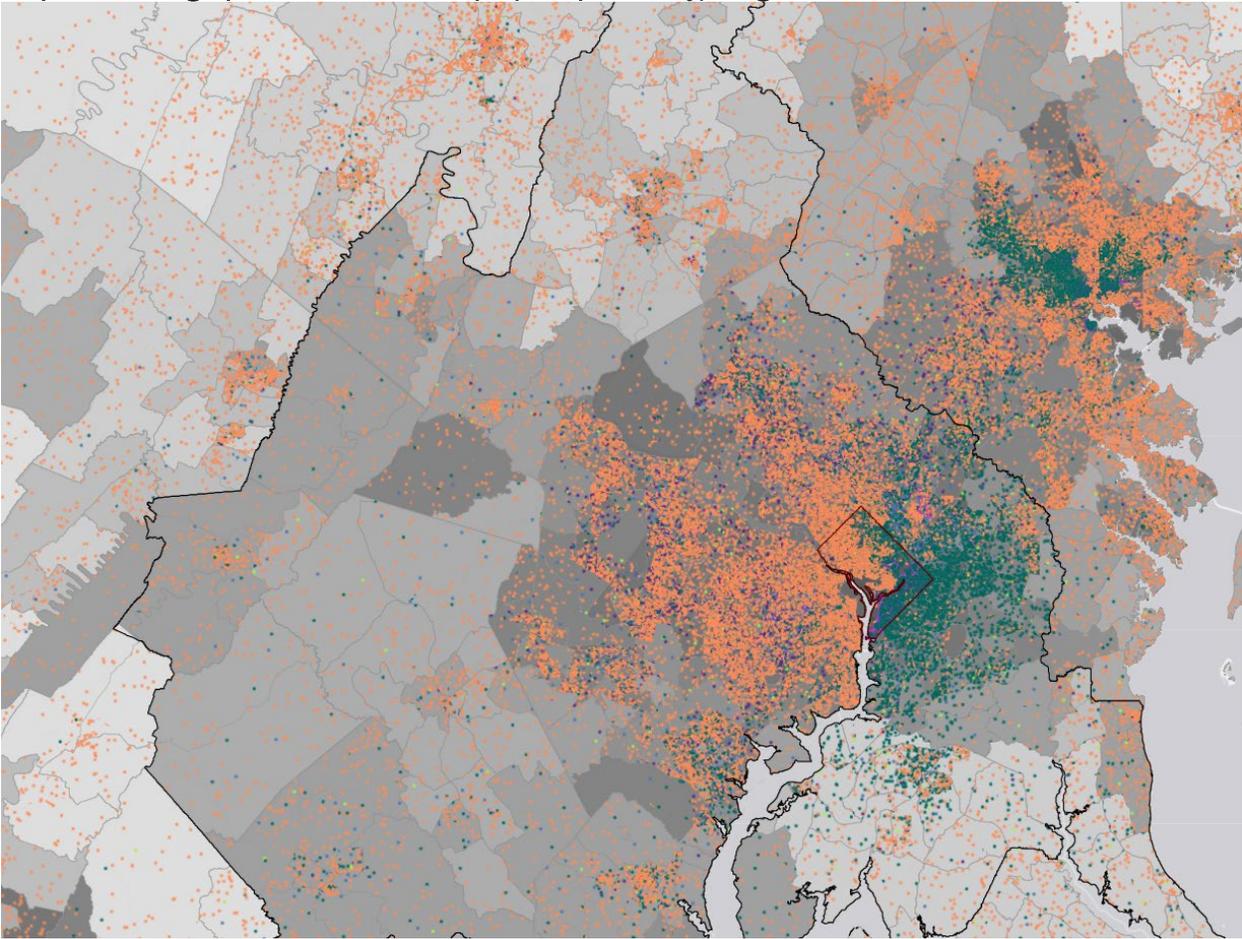
Map 49: Demographics and Low Transportation Cost (Familial Status), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



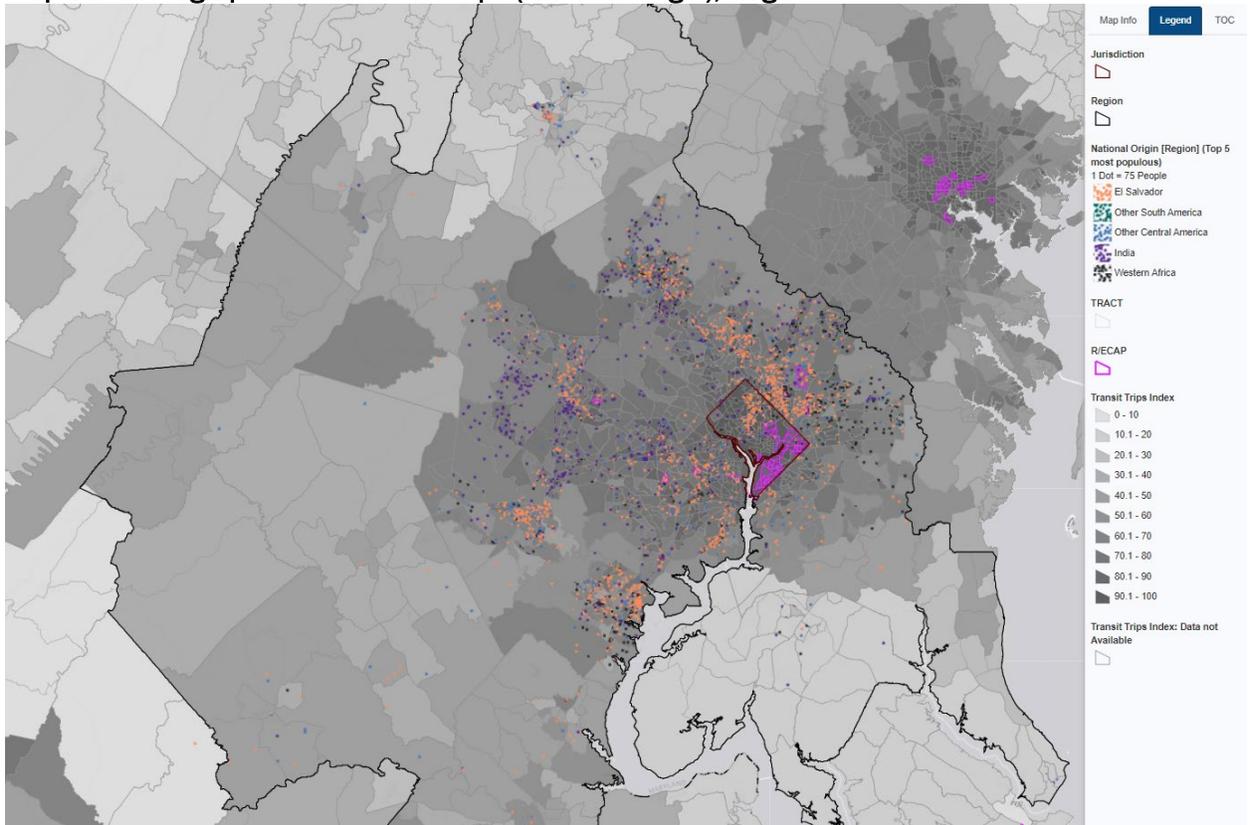
District of Columbia

Throughout D.C., access to transportation is consistently high. Transit Trip Indexes range from 90 to 100. Washington Metropolitan Area Transit Authority (WMATA) Metrorail lines leading out of the city clearly indicate areas with the highest levels of access to transportation, but the city’s robust bus system provides high levels of access to the entire area. The Low Transportation Cost Index is even higher, with values for all racial groups greater than 95. No clear disparities exist in terms of access to transportation or transportation cost based on race or ethnicity.

Map 50: Demographics and Transit Trips (Race/Ethnicity), Region



Map 51: Demographics and Transit Trips (National Origin), Region



Map 52: Demographics and Transit Trips (Family Status), Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Jurisdiction

Region

% of Households that are Families with Children

- 0% - 20%
- 20.1% - 40%
- 40.1% - 60%
- 60.1% - 80%
- 80.1% - 100%

TRACT

R/ECAP

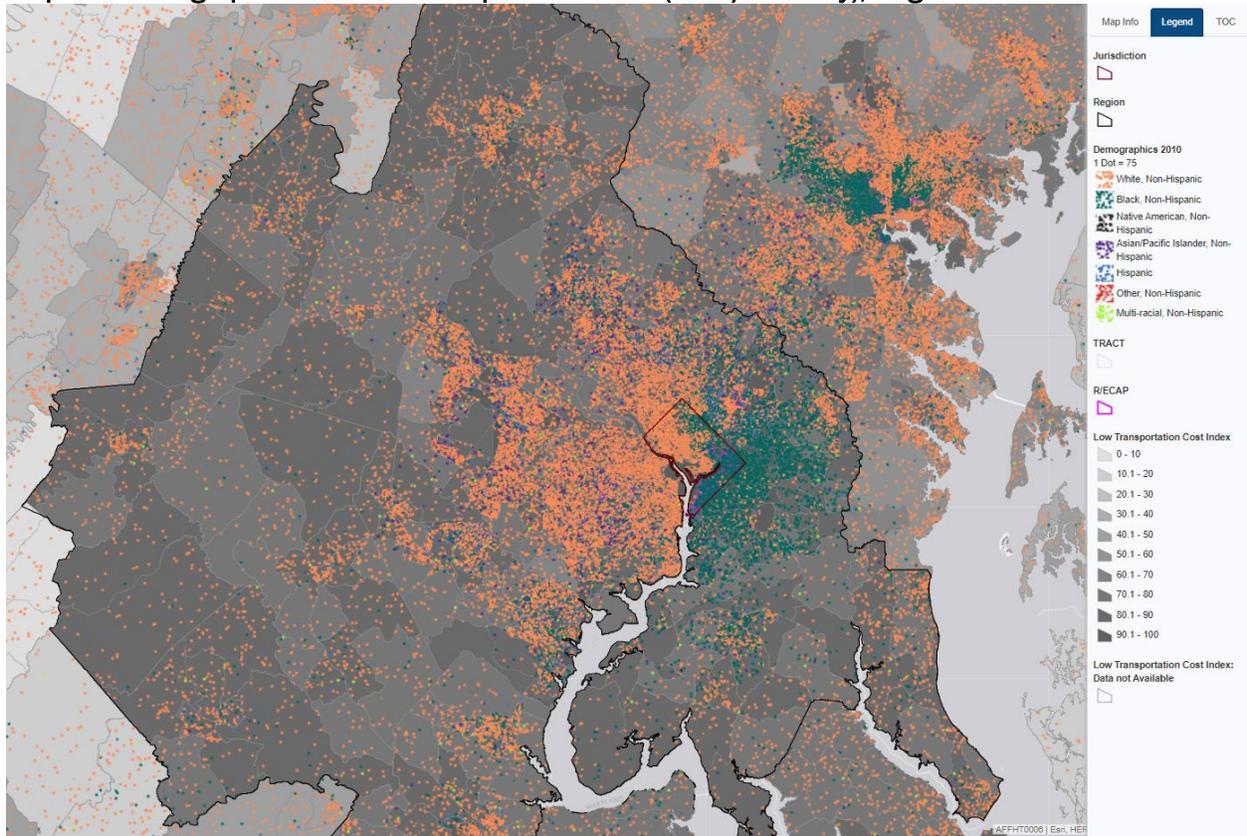
Transit Trips Index

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

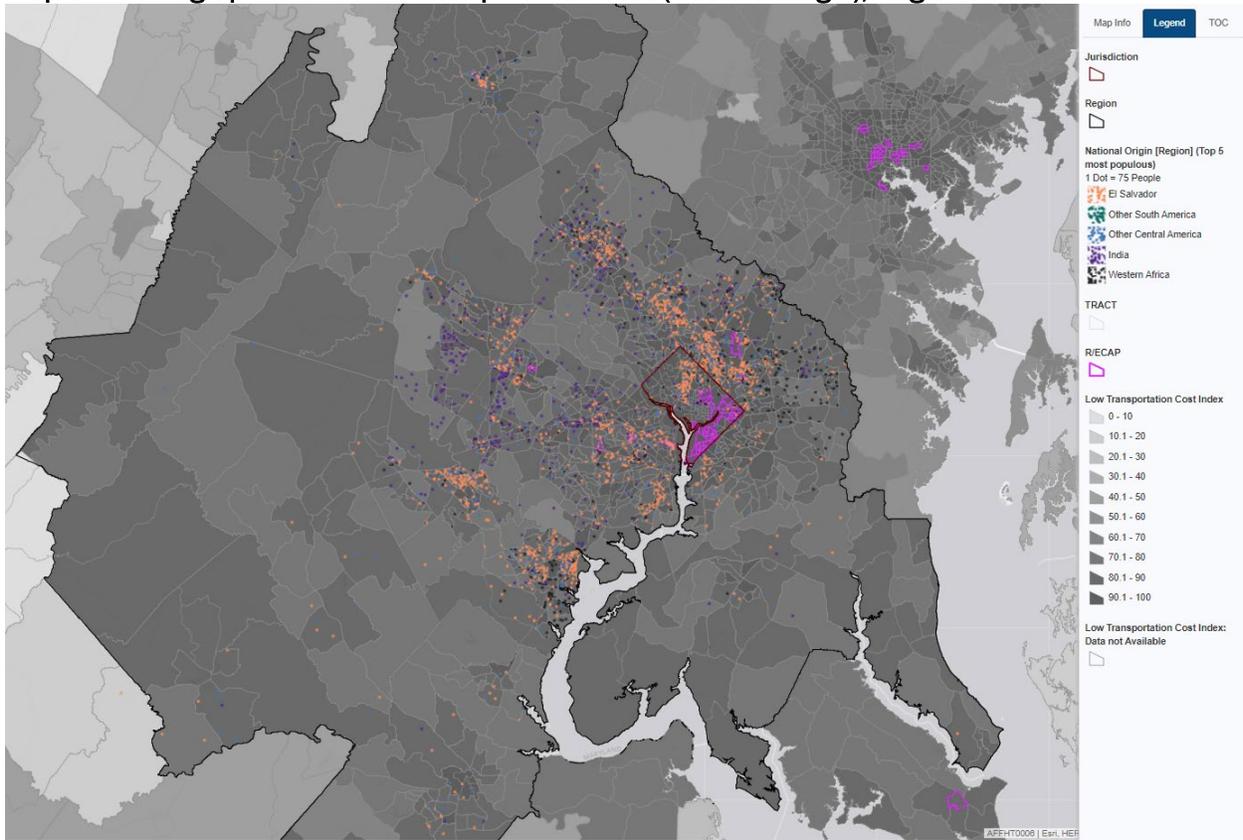
Transit Trips Index: Data not Available

Name: Map 10 - Demographics and Transit Trips
Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: District Of Columbia (CDBG)
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV
HUD-Provided Data Version: AFFHT0006

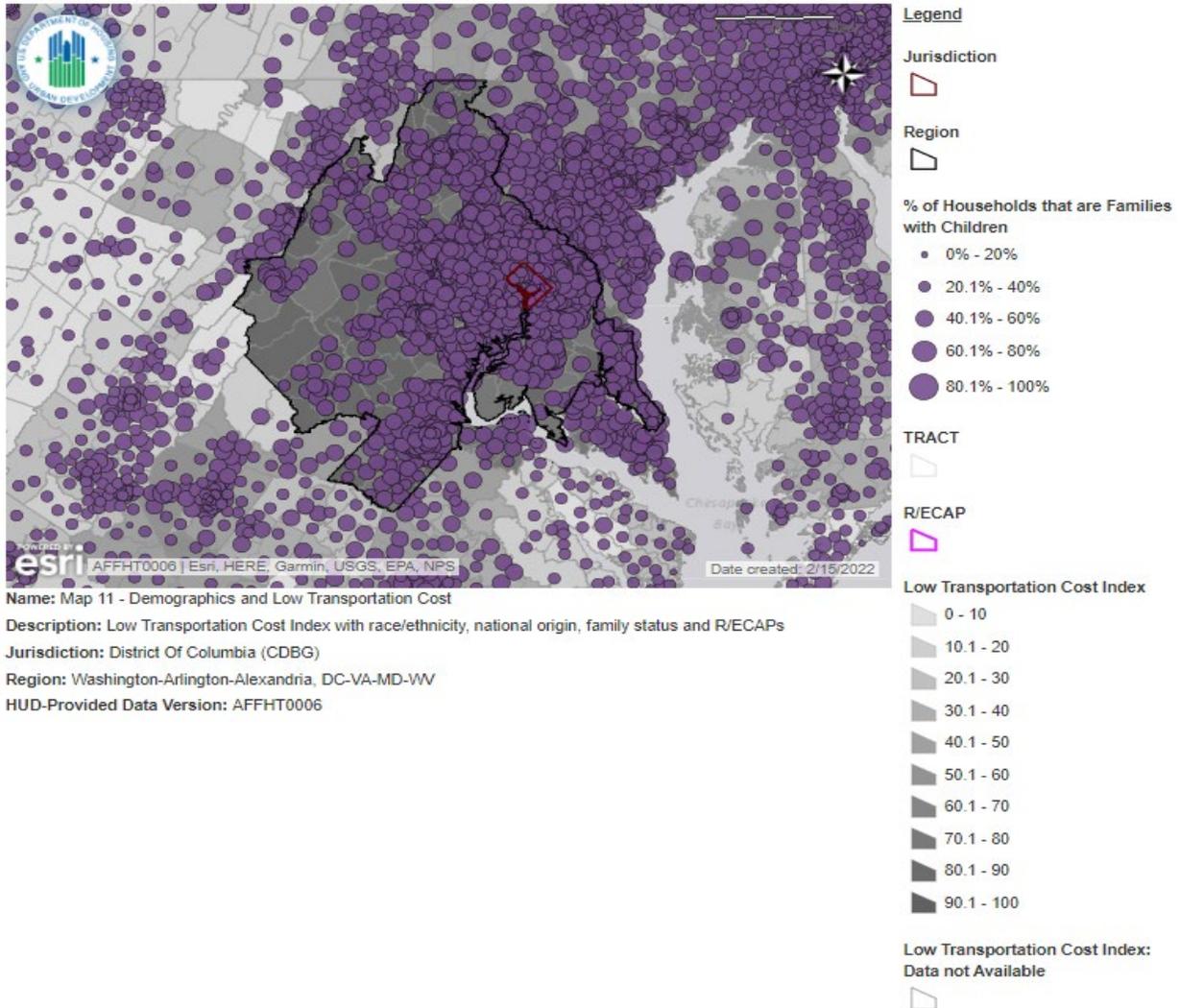
Map 53: Demographics and Low Transportation Cost (Race/Ethnicity), Region



Map 54: Demographics and Low Transportation Cost (National Origin), Region



Map 55: Demographics and Low Transportation Cost (Family Status), Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Region

Throughout the region, access to low-cost transportation is relatively high compared with the rest of the country. To the extent that there are disparities based on race and ethnicity, the lowest Transit Index values are for White residents, at a regional level of 64.69 for the total population, compared with Black residents at 72.18, Hispanic residents at 74.25, Asian or Pacific Islander residents at 73.66, and Native American residents at 65.28. This distribution is even more pronounced for individuals living below the poverty line, with the value for White residents at 64.97, Black residents at 80.43, Hispanic residents at 77.28, Asian or Pacific Islander residents at 77.63, and Native American residents at 75.29. The Low Transportation Cost Index follows a similar, though less pronounced, distribution with values ranging from 87.43 to 91.47 for the total population. Once again, the lowest values are for White residents, and they are highest for Hispanic residents, followed closely by Black residents at 91.18, Asian or Pacific Islander residents at 89.94, and Native American residents at 88.87. For those living below the poverty line, Low Transportation Cost Index values range from 88.8 to 94.80, with the worst transportation values for White residents living below the poverty line, and the highest for Black residents. The second-highest value is for Hispanic residents, at 92.19, followed closely by Asian or Pacific Islander residents at 92.6 and Native American Residents at 92.25.

These statistics, however, are slightly misleading in that they do not control for the population density and are skewed by the lack of public transit in suburban areas that are disproportionately White. It remains true that a higher percentage of Black and Hispanic residents are reliant on public transit, such that these numbers do not fully reflect existing inequities in transportation.

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

District of Columbia

D.C. has consistent and strong transportation across the city. There do not appear to be any disparities in Transit Trip Indexes correlated to racial or ethnic patterns. Areas with slightly lower Transit Trip Indexes have slightly lower population density, but all neighborhoods of the city are well served by affordable transportation. As previously mentioned, a large majority of families have access to public transportation, and an even larger majority of jobs are accessible by high-frequency public transit. However, as rents continue to rise within the District, displacement of low-income communities of color to farther-out sections of the metro area may result in more difficulty reaching frequent and convenient modes of public transit.

Region

To the extent that there are disparities in access to transportation, they do correlate with residential living patterns. White residents are more likely to live in more suburban areas in further from D.C. that have less access to transportation. Indeed, the lack of public transit in these areas may explain why they are disproportionately White, as Black and Hispanic residents are more likely to rely on public transit. In contrast, areas of the region that are home to more Black and Hispanic residents, like D.C. proper, have greater access to transportation.

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

d. Disparities in Access to Opportunity—Access to Low-Poverty Neighborhoods

i. Describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

Disparities in access to low-poverty neighborhoods is measured by the Low Poverty Index. The Low Poverty Index is a HUD calculation using both family poverty rates and public assistance receipt in the form of cash welfare (such as Temporary Assistance for Needy Families). This is calculated at the census tract level. The higher the score, the less exposure to poverty in the neighborhood.

Data note: Some of the tables and maps in this section are sourced from the HUD tool, which used 2011–2015 five-year ACS data. These maps and tables are accessible to all and can be used by anyone to numerically and spatially analyze their jurisdictions or communities of interest. Other tables and maps that the Urban Institute created are based off of 2015–2019 five-year ACS estimated data. Due to this, some of the maps identify different census tracts as R/ECAPs and reflect slightly different demographic data.

Table 19: Low Poverty Index

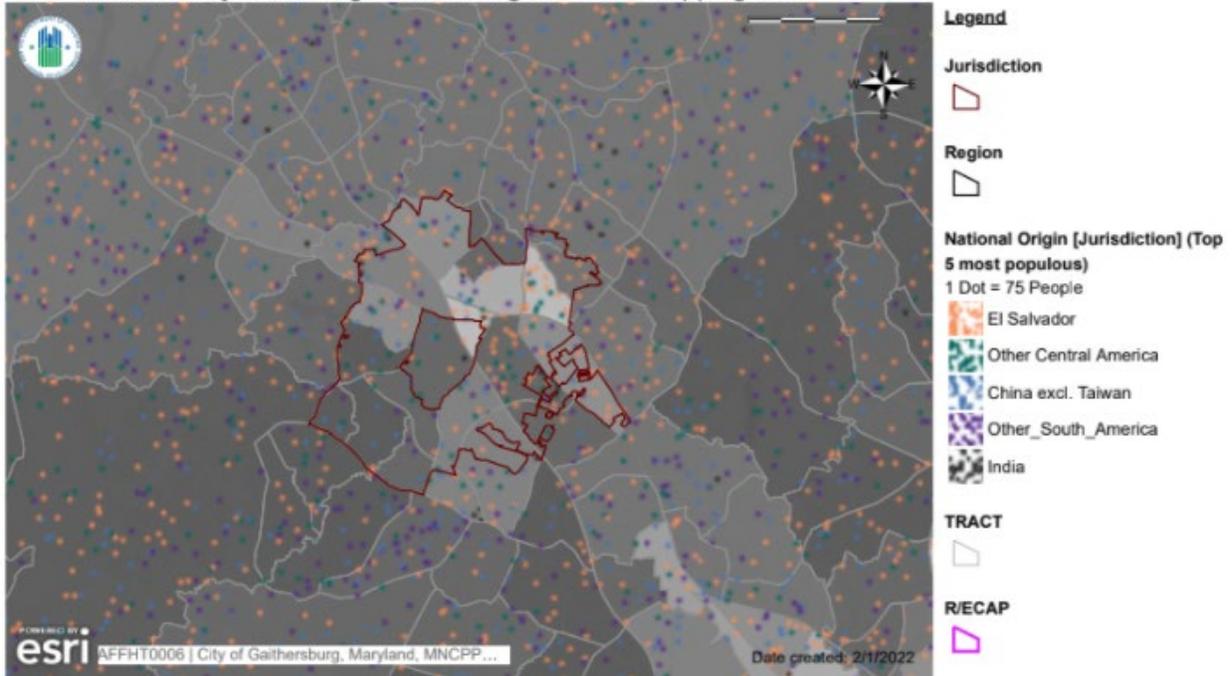
Low Poverty Index	District of Columbia	Region
Total Population		
White, Non-Hispanic	73.73	79.93
Black, Non-Hispanic	33.64	61.71
Hispanic	55.24	65.57
Asian or Pacific Islander, Non-Hispanic	66.79	78.68
Native American, Non-Hispanic	47.48	70.77
Population below federal poverty line		
White, Non-Hispanic	72.84	71.36
Black, Non-Hispanic	26.94	45.68
Hispanic	52.50	56.92
Asian or Pacific Islander, Non-Hispanic	68.12	68.99
Native American, Non-Hispanic	52.92	64.66

Map 56: Demographics and Low Poverty Neighborhoods (Race/Ethnicity), District of Columbia

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Map 57: Demographics and Low Poverty Neighborhoods (National Origin), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 12 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

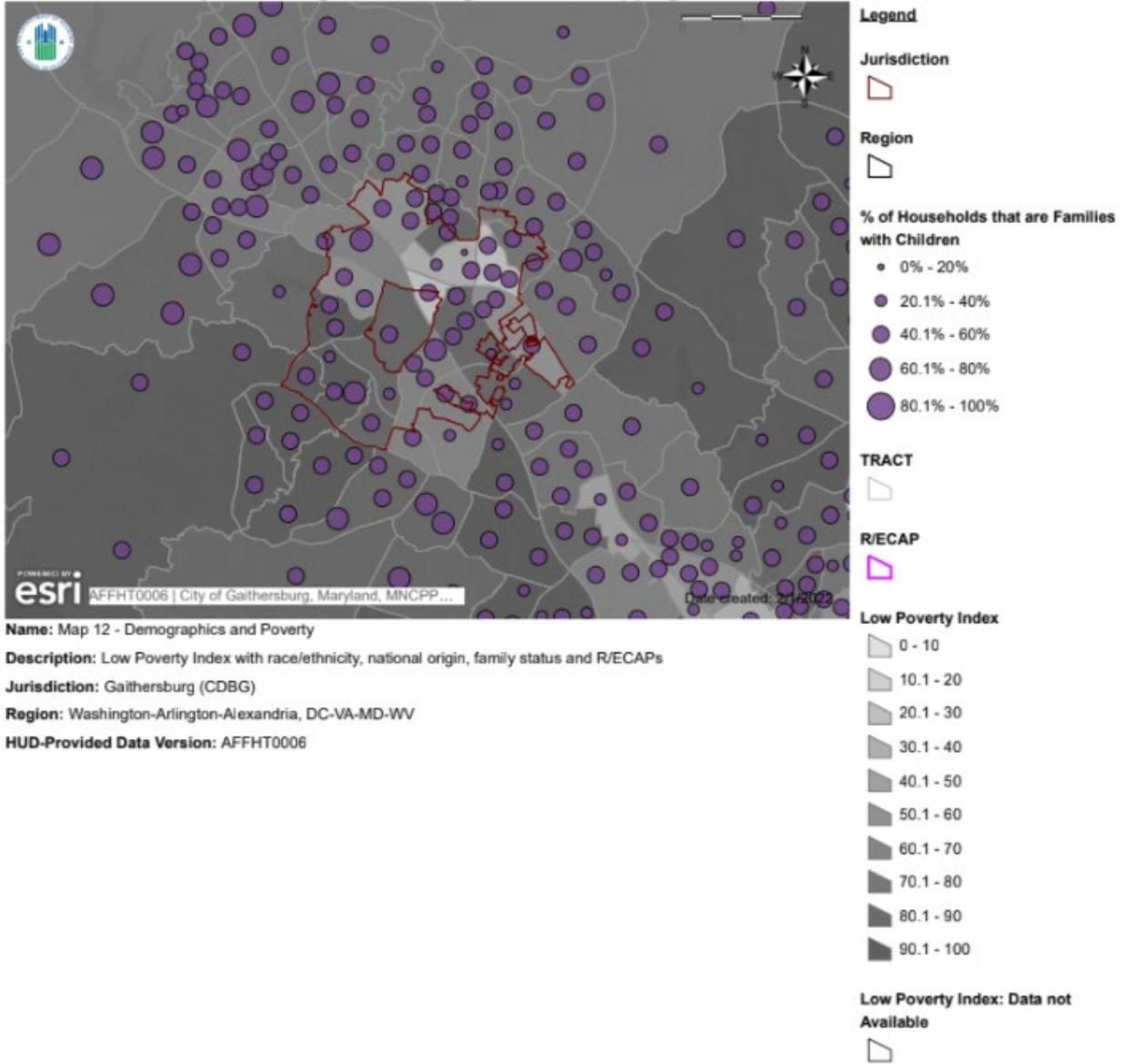
Jurisdiction: Gaithersburg (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 58: Demographics and Low Poverty Neighborhoods (Family Status), District of Columbia

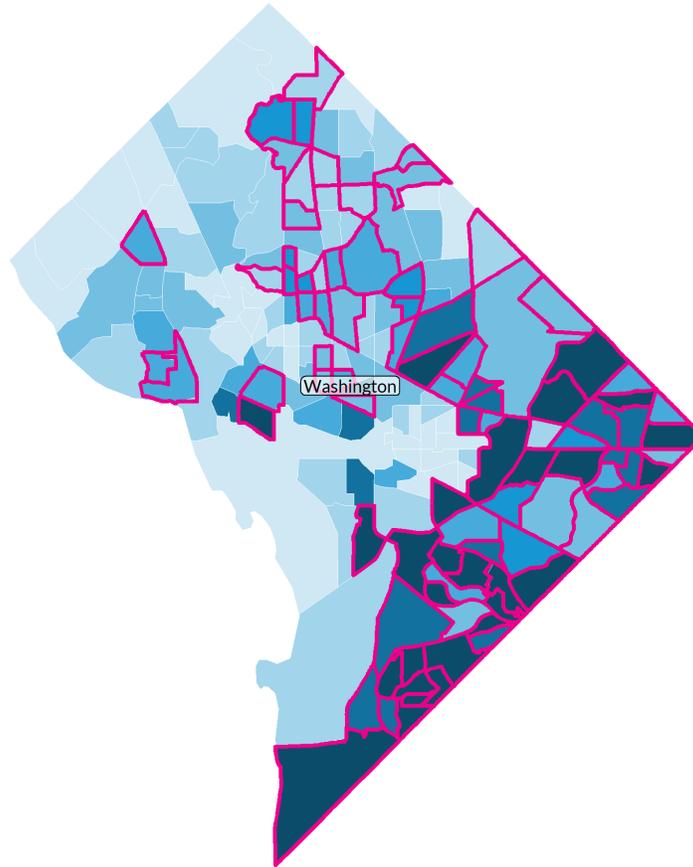
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Map 59: Jurisdictional Poverty Rates by Census Tract with COG Opportunity Areas, District of Columbia

Poverty Rates by Census Tract in District of Columbia

COG Equity Emphasis Area Highlighted in Magenta

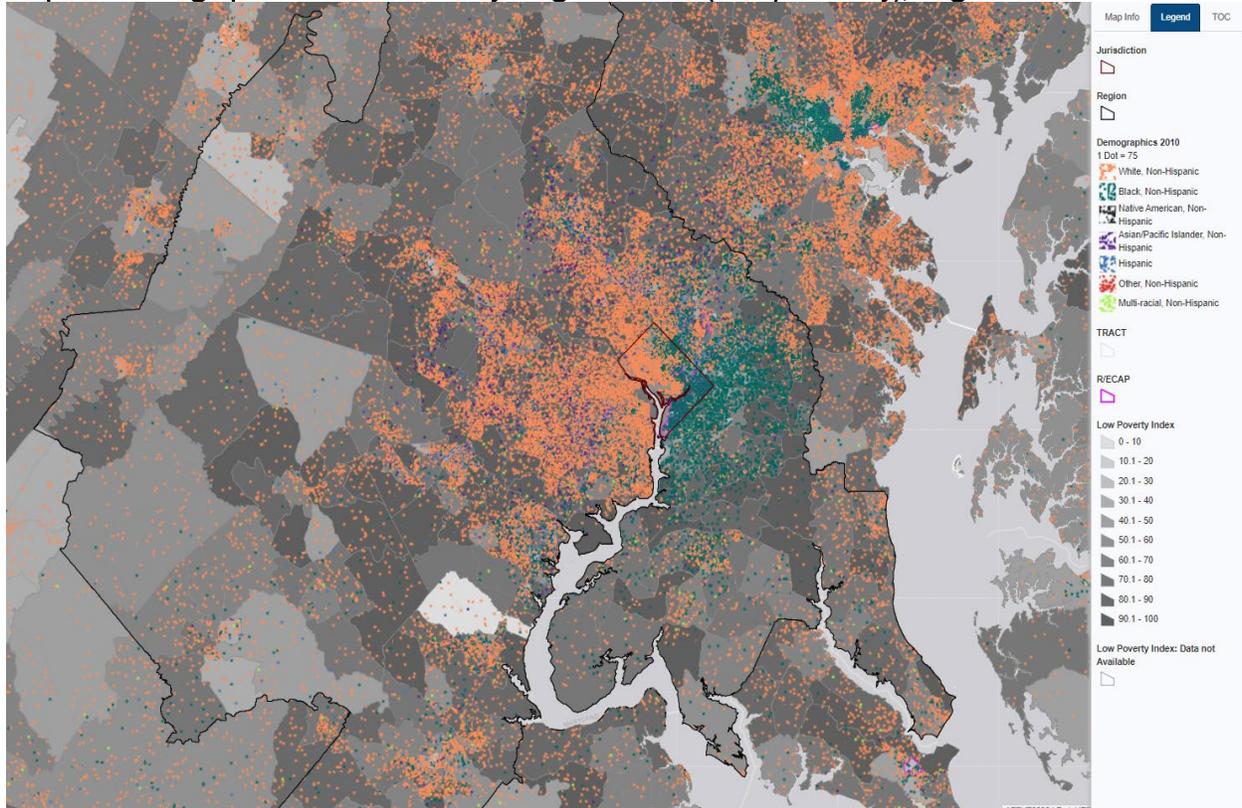


Source: American Community Survey 5-Year Estimates, 2015-2019

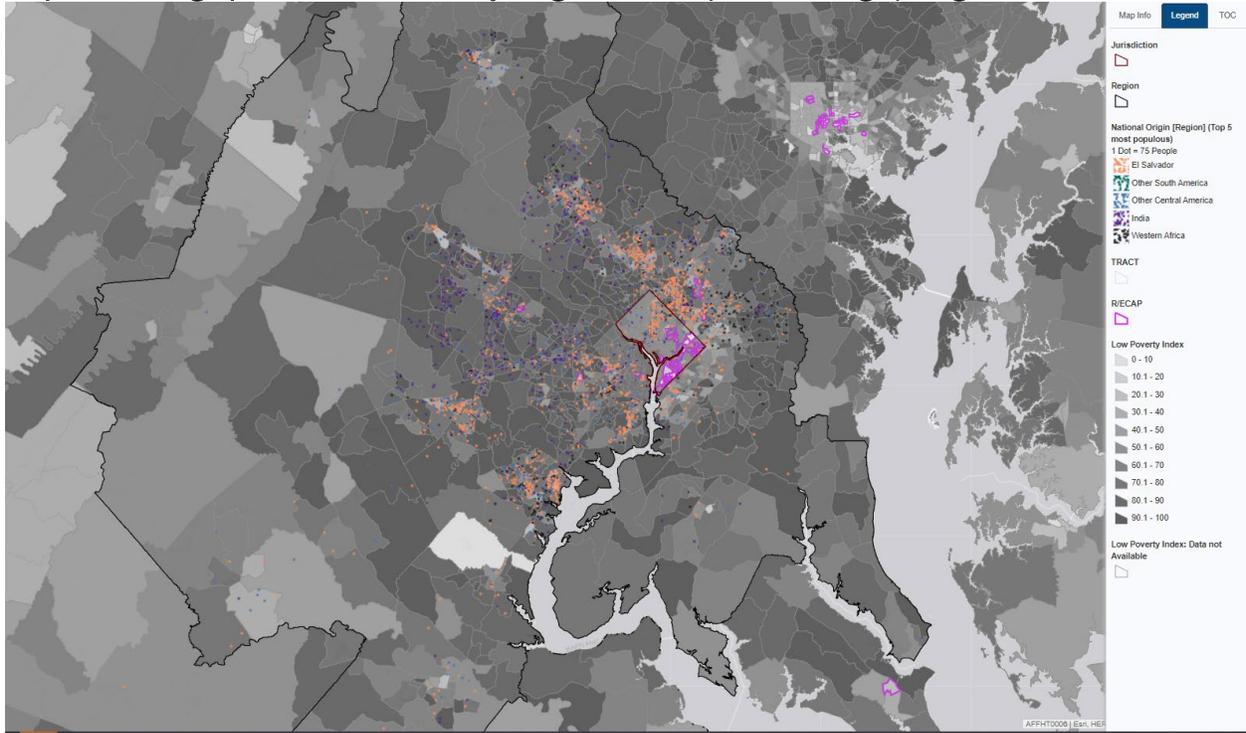
District of Columbia

Out of all the jurisdictions reviewed, D.C. has the lowest access to low-poverty neighborhoods measured by index value. Racial disparities are particularly pronounced here. The index value for White residents is significantly higher, at 73, than the values for other groups. The racial disparities in index values for White and Black residents is especially pronounced, with Black residents' having an index value of 33, a 40-point difference in value from the value for White residents. The comparative index values for Native American and Hispanic residents also are concerning, at 44 and 55. When comparing the degree of access between groups below the poverty line, Black residents experience the largest drop in value, losing 10 points after economic status is factored into the analysis.

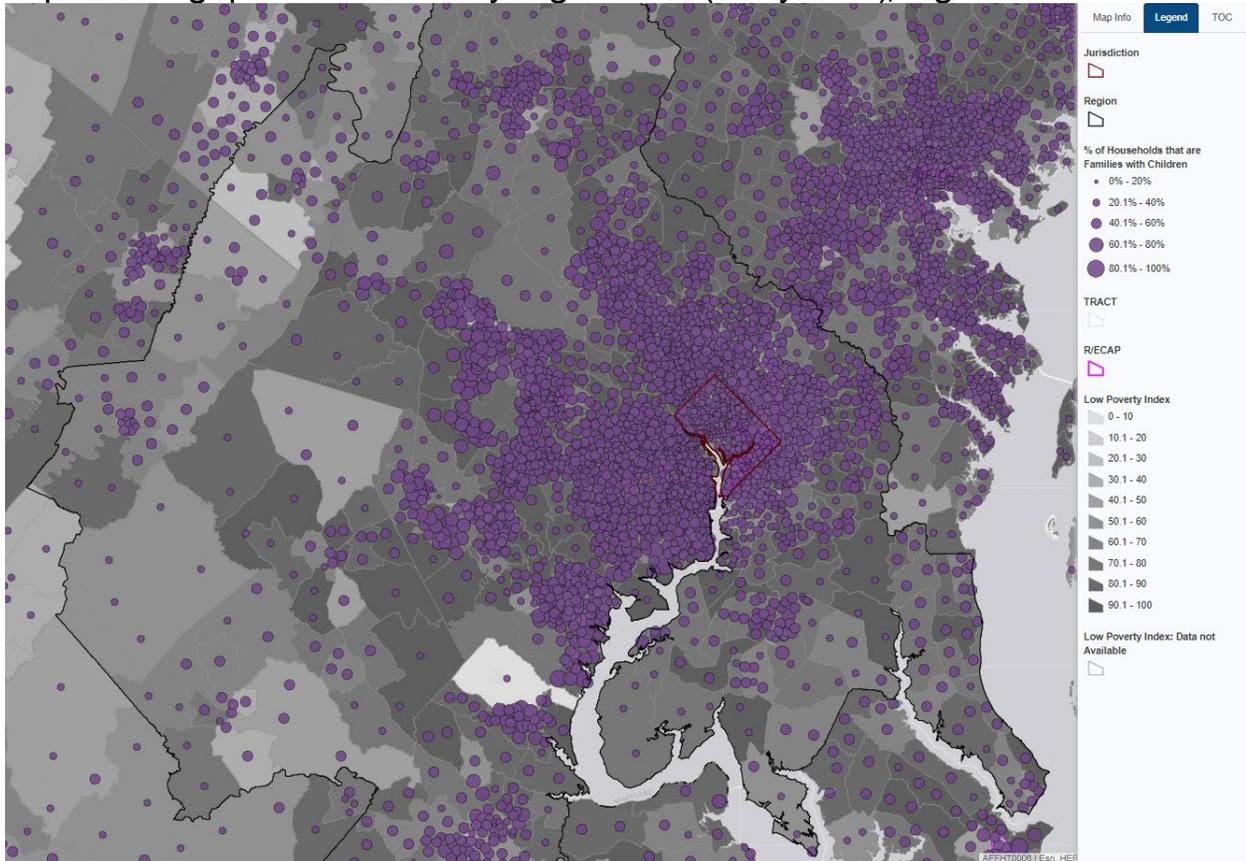
Map 60: Demographics and Low Poverty Neighborhoods (Race/Ethnicity), Region



Map 61: Demographics and Low Poverty Neighborhoods (National Origin), Region



Map 62: Demographics and Low Poverty Neighborhoods (Family Status), Region



Region

The regional trend for racial disparities follows a similar pattern as the jurisdictional trends. As is the case for all jurisdictions, White residents are more likely than other groups to reside in areas with low-poverty neighborhoods. While the index value for White residents is 79, the values for Hispanic and Black residents are much lower: 65 and 61. The regional trend most closely aligns with the District of Columbia and Fairfax County because in these jurisdictions, Black residents face higher incidences of restricted access to low-poverty neighborhoods than any other group. In the majority of jurisdictions, Hispanic residents have the least access to low-poverty neighborhoods. As displayed throughout the individual jurisdictions, poverty levels also have a significant negative impact on index values for all groups, but the comparative index value losses by racial group do show a racial and ethnic disparity in reduced access as well.

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

District of Columbia

D.C. has a clear pattern of racial disparities in access to low-poverty neighborhoods. The District's northwest quadrant has much higher index values than any other area of the city. In contrast, Northeast and Southeast D.C. have notably lower index values. Because of D.C.'s residential segregation by race, access to low-poverty neighborhoods closely align with race. Northwest D.C. is predominantly white and has the highest index values. National-origin residential patterns do not correlate with this trend, however. Immigrant populations reside in neighborhoods in wards 1 and 4, from Northwest D.C. to the east of Rock Creek Park. The primary immigrant populations residing there are Salvadoran, East African, and Central American.

Region

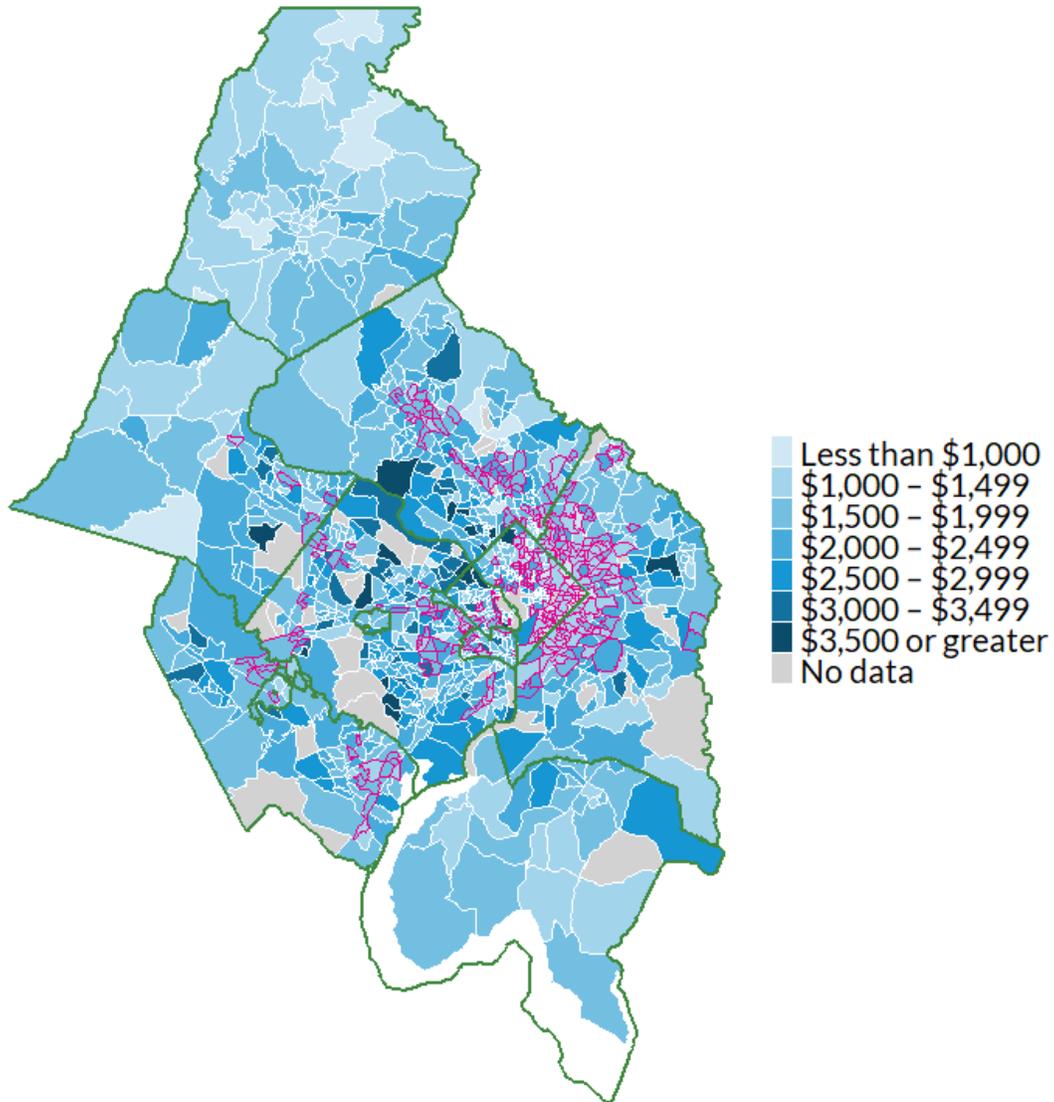
In general, disparities in access to low-poverty neighborhoods correlate with residential living patterns in the region. Access to low-poverty neighborhoods is much higher in suburban areas, particularly in Loudoun, Fairfax, and Montgomery Counties. These areas are disproportionately White, and to a lesser extent, Asian American. In contrast, urban areas with low levels of access to low-poverty neighborhoods are consistently home to larger numbers of Black and Hispanic residents. This includes the District of Columbia and the urban portions of Alexandria and Arlington. But even within these urban areas, where people of color comprise a majority of the population, access to low-poverty neighborhoods is heavily correlated with race and ethnicity.

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

Map 63: Median Rental Rates, Region

Median Gross Rent by Census Tract in Washington Region

COG Equity Emphasis Area Highlighted in Magenta

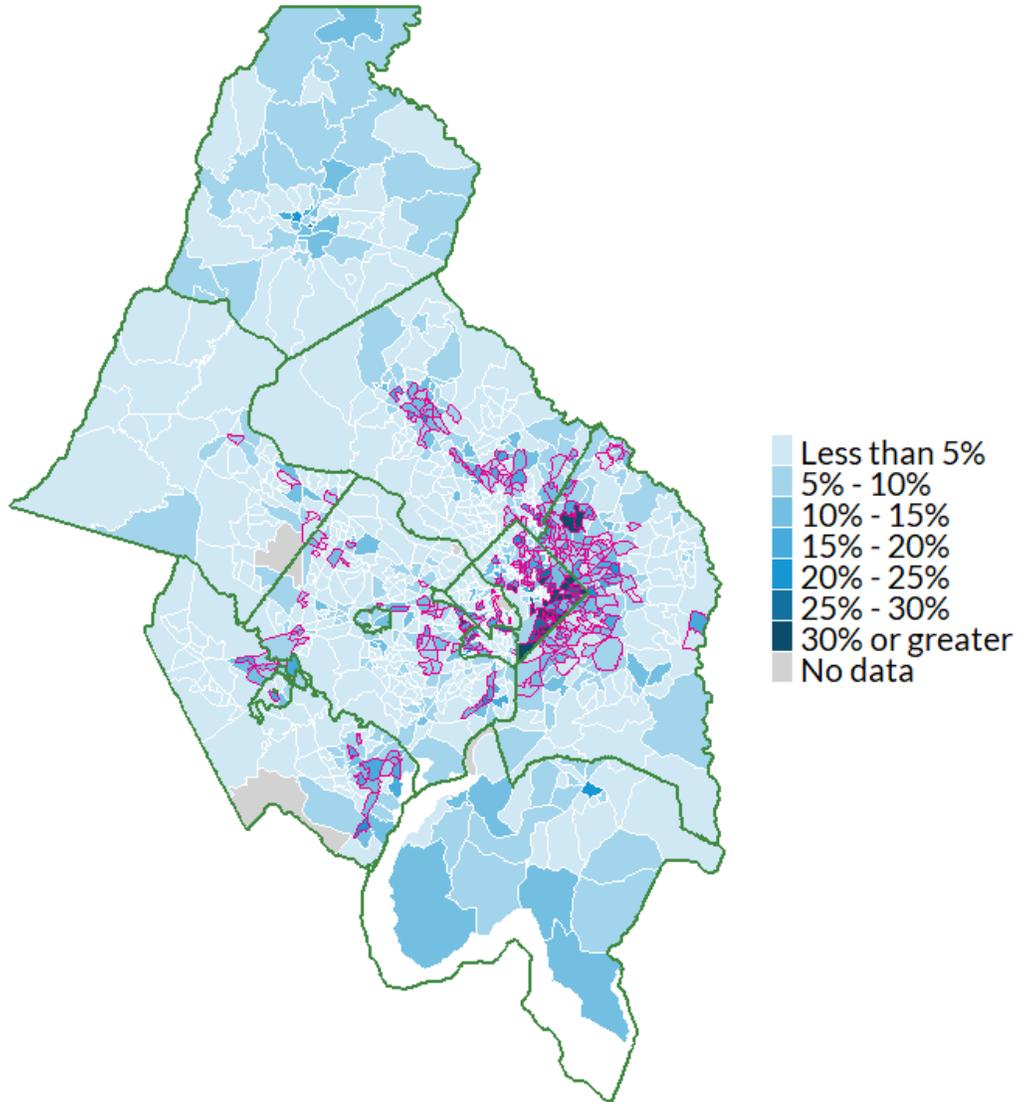


Source: American Community Survey 5-Year Estimates, 2015-2019

Map 64: Poverty Rates, Region

Poverty Rates by Census Tract in Washington Region

COG Equity Emphasis Area Highlighted in Magenta

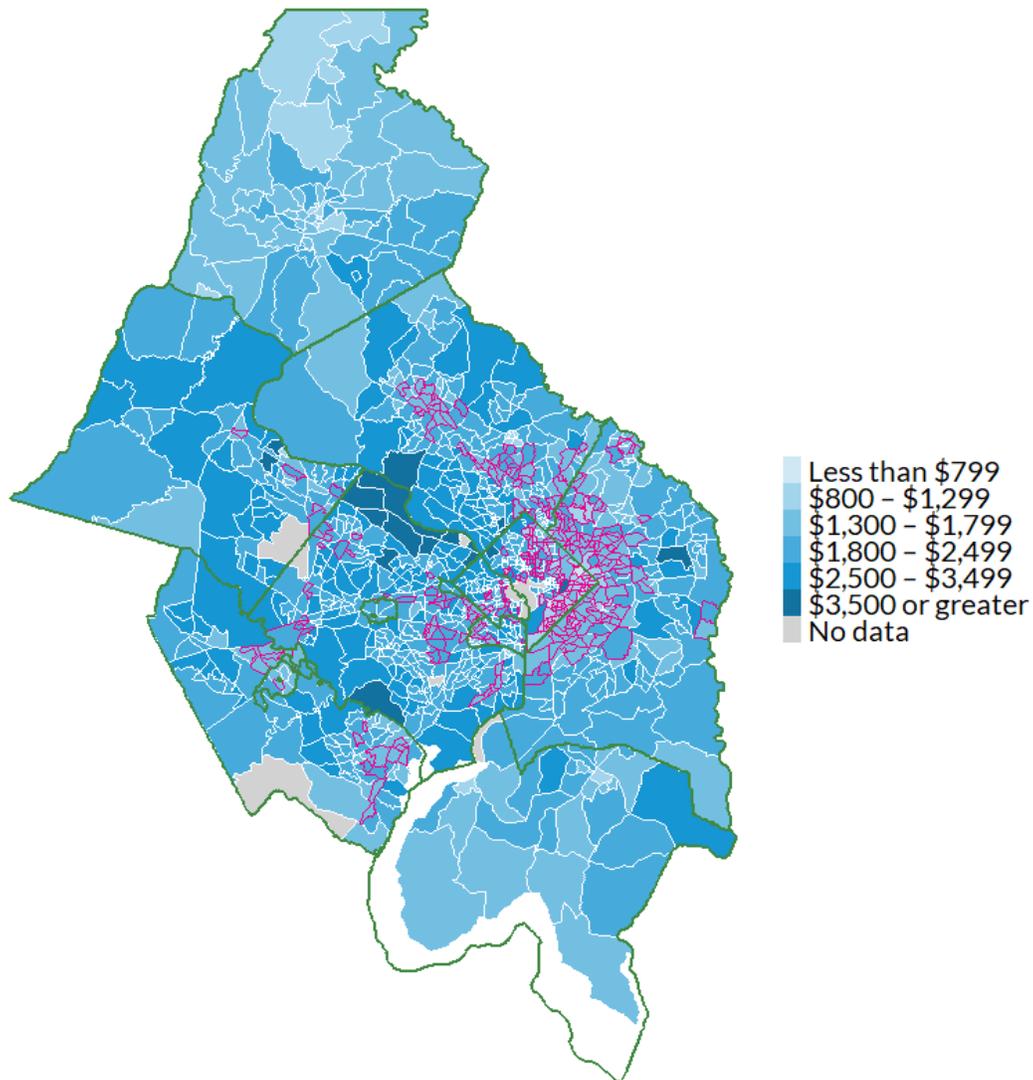


Source: American Community Survey 5-Year Estimates, 2015-2019

Map 65: Median Housing Costs, Region

Median Monthly Housing Cost by Census Tract in Washington Region

COG Equity Emphasis Area Highlighted in Magenta



Source: American Community Survey 5-Year Estimates, 2015-2019

Region

These policies are mostly addressed in Contributing Factors, particularly the section Impediments to Mobility (see page XX). Other contributing factors also explain disparities in access to low-poverty neighborhoods, such as (1) lack of investment in specific neighborhoods, (2) lack of resources for fair housing agencies and organizations, (3) lack of affordable accessible housing a range of unit sizes, (4) practices and decisions for publicly supported housing, (5) occupancy codes and restrictions, (6) land use and zoning laws, (7) location and type of affordable housing, and (8) lack of community revitalization strategies, among others. Ultimately, all of the contributing factors either directly or indirectly impact access to low-poverty housing.

One of the policies with the largest impact on access to low-poverty neighborhoods is inclusionary zoning, which jurisdictions in the region have implemented, though with varying levels of stringency. In 2020, Virginia implemented legislation that encouraged localities to implement more aggressive inclusive zoning. The District of Columbia in particular has focused on upzoning the Rock Creek West area. Another policy that has notable impacts on access to low-poverty neighborhoods throughout the region is the improvement of payment standards, which Montgomery County, D.C., and Prince William County have all implemented.

e. Disparities in Access to Opportunity—Access to Environmentally Healthy Neighborhoods

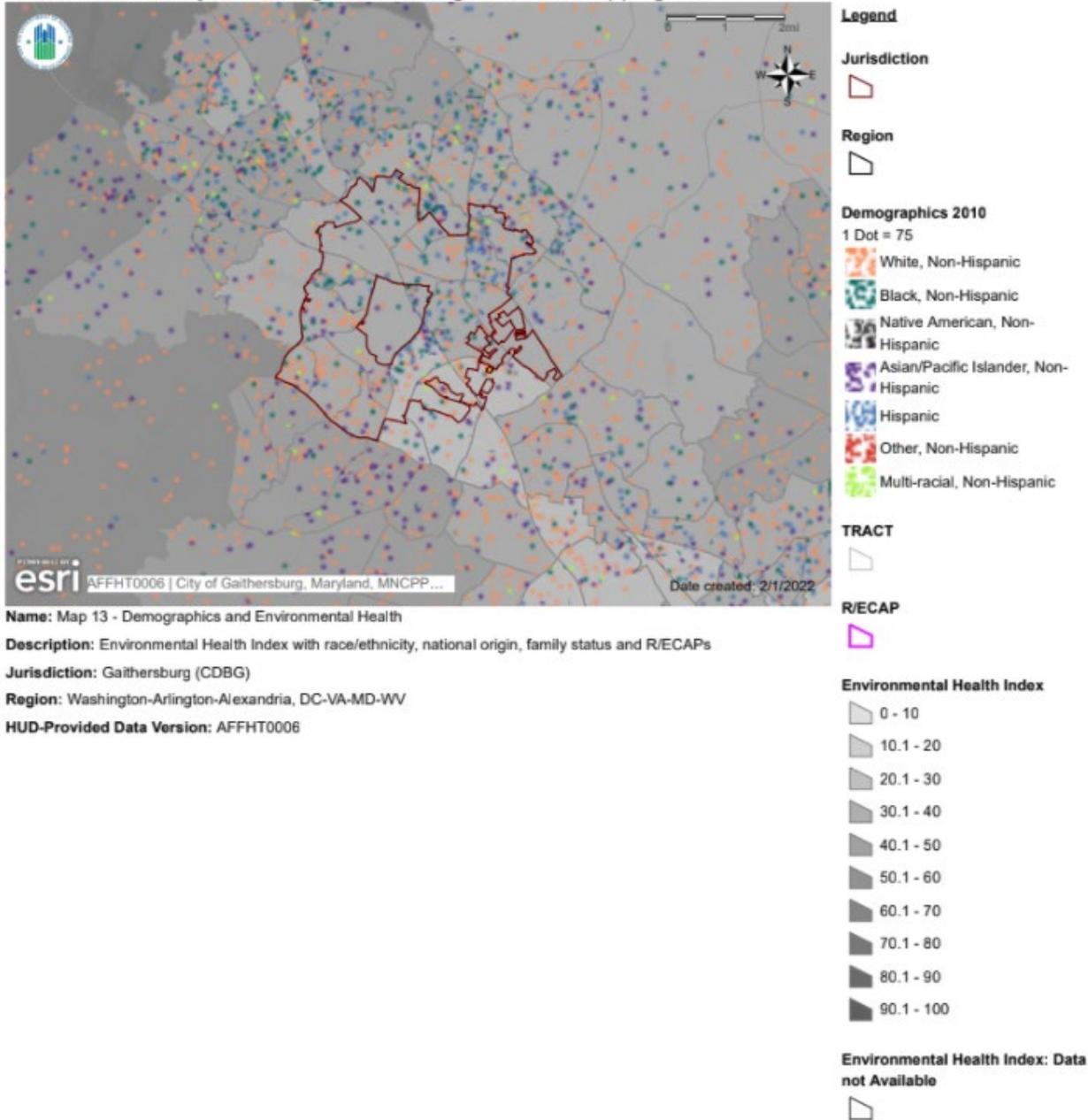
i. Describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The Environmental Health Index provided by HUD measures exposure to harmful airborne toxins. The index is based on standardized Environmental Protection Agency estimates of carcinogenic, respiratory, and neurological hazards in air. The index does not consider other environmental issues such as water quality or soil contamination, meaning it is a limited measure of overall environmental health. However, it can still provide useful insight into environmental conditions in jurisdictions. Index values range from 0 to 100, with higher values indicating better conditions and less exposure to environmental hazards that can harm human health. Generally, urban areas tend to have lower air quality as these areas have more emission sources and thus more exposure to hazards.

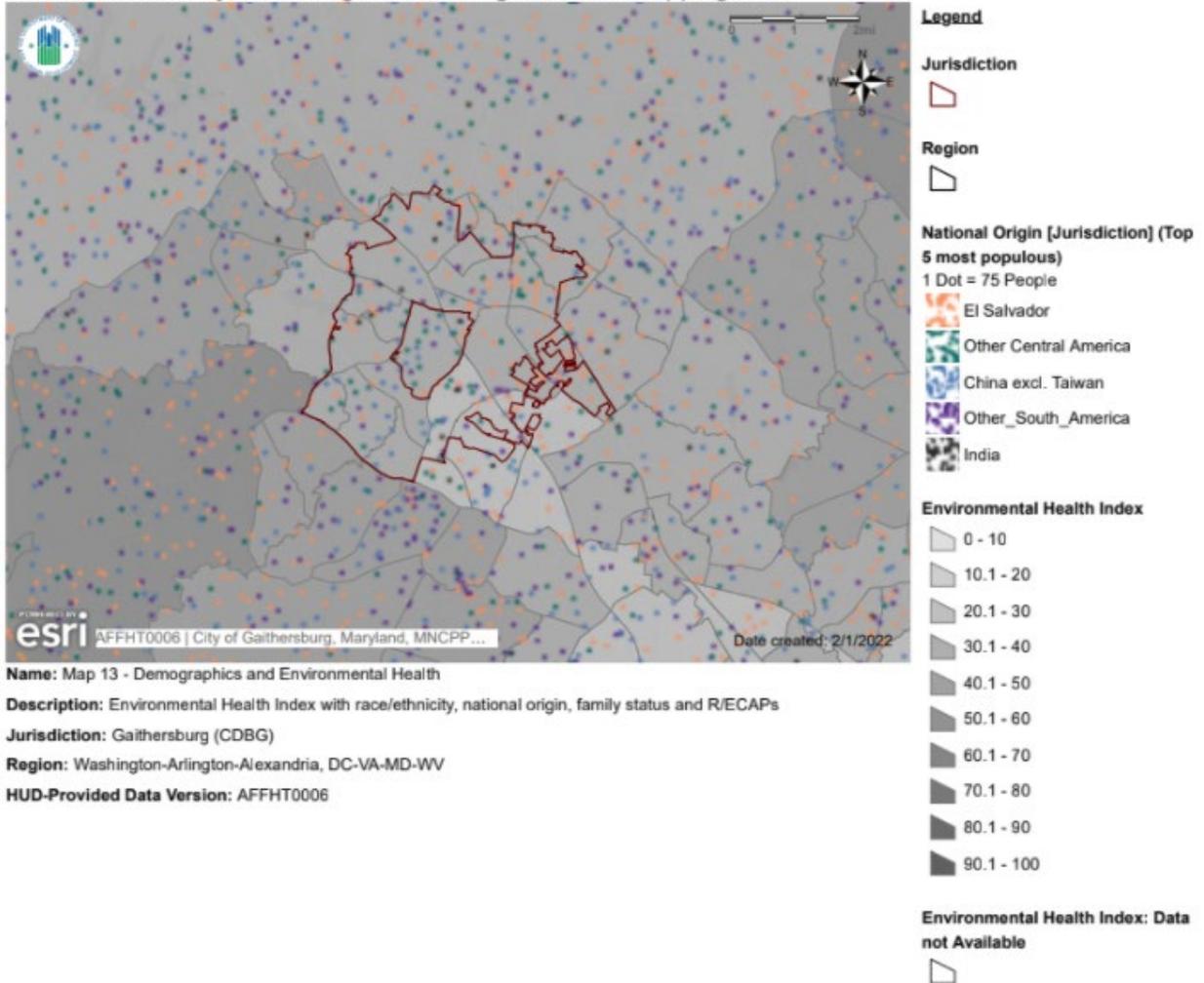
Table 20: Environmental Health Index

Low Poverty Index	District of Columbia	Region
Total Population		
White, Non-Hispanic	18.25	44.24
Black, Non-Hispanic	20.99	35.39
Hispanic	19.38	36.59
Asian or Pacific Islander, Non-Hispanic	17.29	38.50
Native American, Non-Hispanic	19.12	42.19
Population below federal poverty line		
White, Non-Hispanic	17.06	42.92
Black, Non-Hispanic	20.79	29.66
Hispanic	18.91	34.45
Asian or Pacific Islander	14.83	34.19
Native American, Non-Hispanic	17.90	35.99

Map 66: Demographics and Environmental Health (Race/Ethnicity), District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 67: Demographics and Environmental Health (National Origin), District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 13 - Demographics and Environmental Health

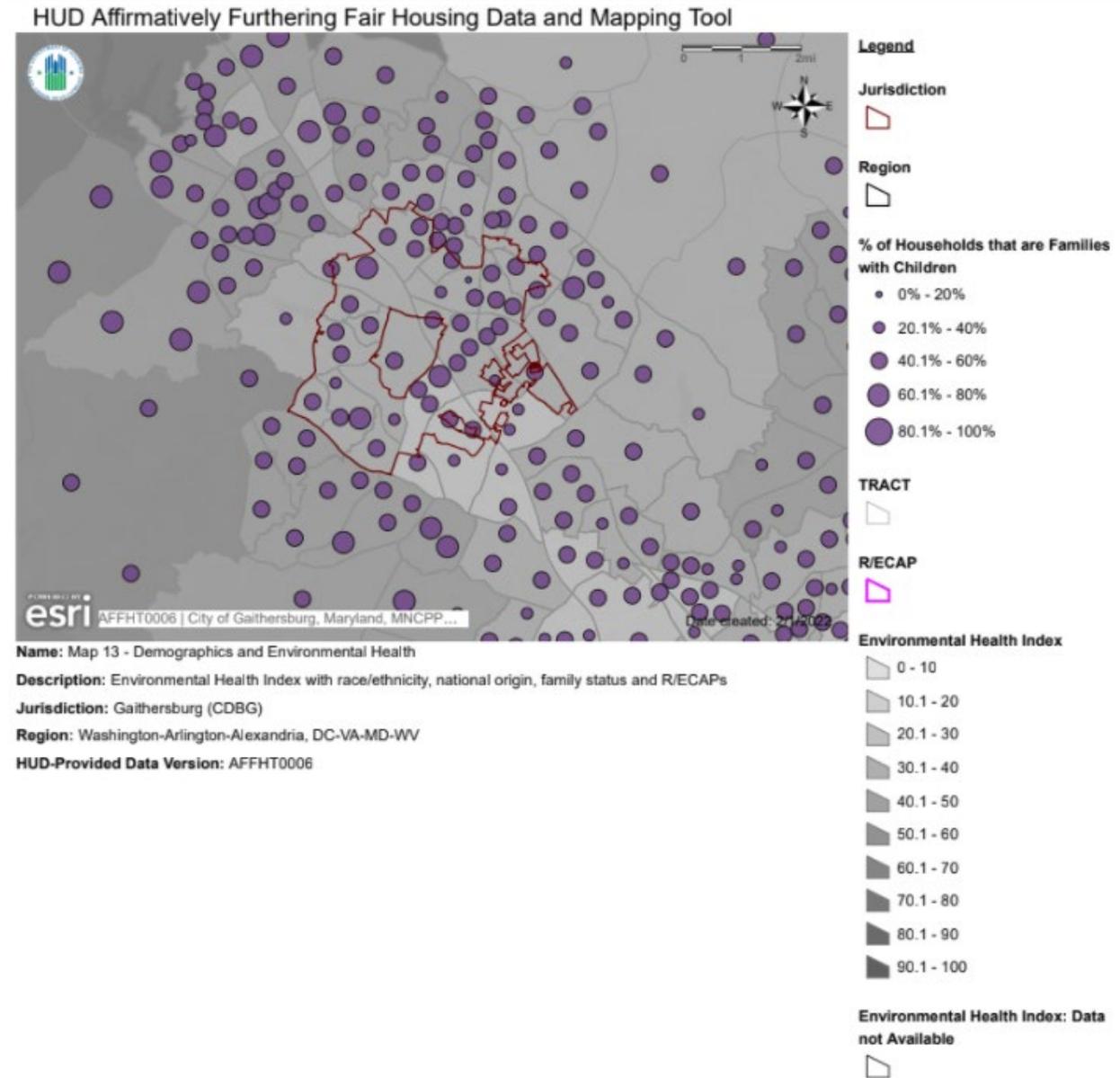
Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Gaithersburg (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

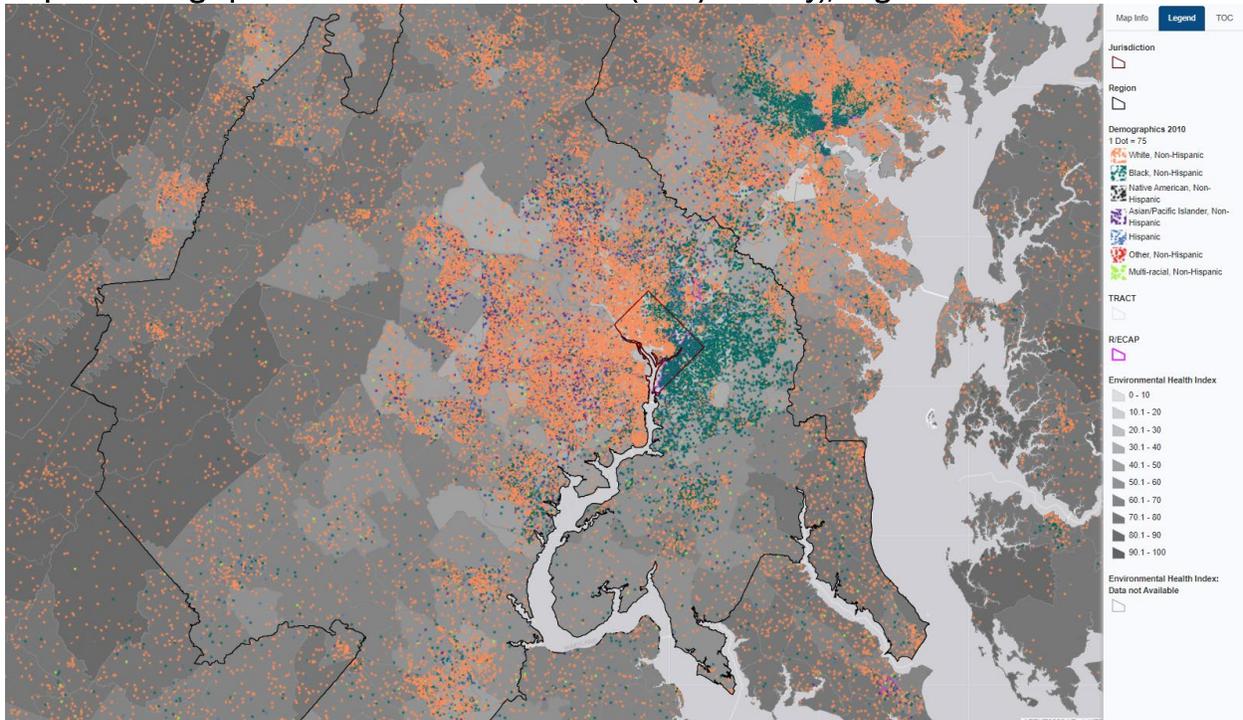
Map 68: Demographics and Environmental Health (Familial Status), District of Columbia



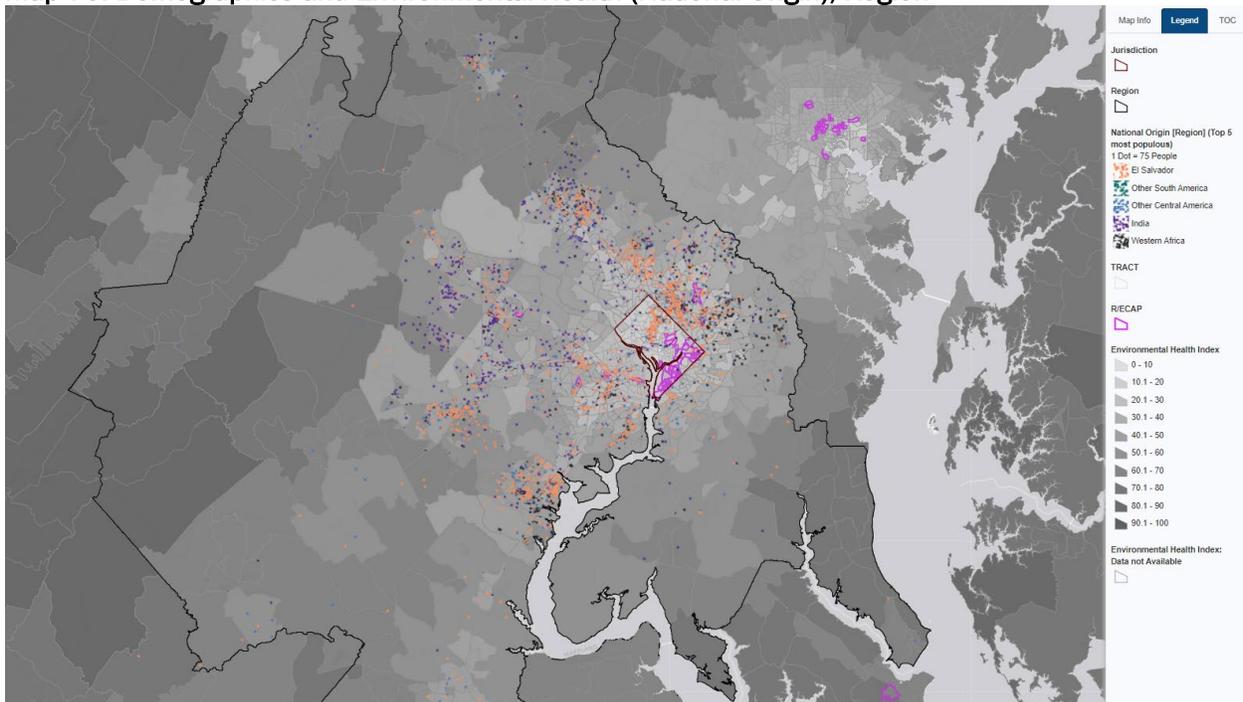
District of Columbia

In D.C., access to environmentally healthy neighborhoods is low for all racial and ethnic groups, with negligible differences in Environmental Health Indexes across the city, ranging from 17.29 to 20.99 for the total population and 14.83 to 20.79 for residents below the poverty line. The Environmental Health Index is one of the few Opportunity Indexes for which Black residents score higher than White residents, at 18.25 and 20.99, respectively. Native Americans and Hispanic residents also score higher than White residents, at 19.12 and 19.38, respectively. Asian or Pacific Islanders had the lowest Environmental Health Indexes. This distribution holds true for residents below the poverty line.

Map 69: Demographics and Environmental Health (Race/Ethnicity), Region

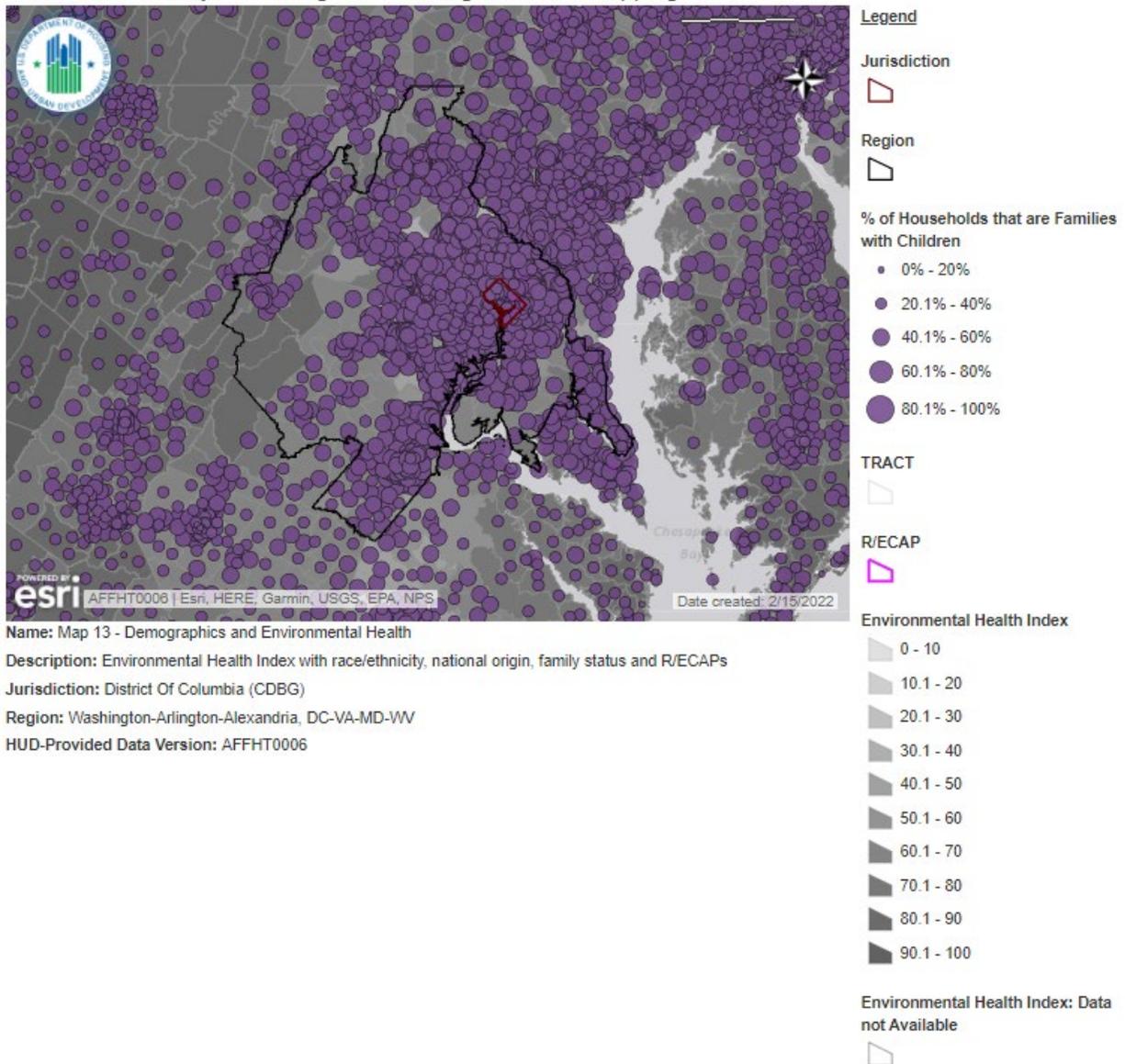


Map 70: Demographics and Environmental Health (National Origin), Region



Map 71: Demographics and Environmental Health (Familial Status), Region

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Region

Racial differences are more pronounced at the regional level, with an Environmental Health Index value of 44.24 for White residents versus 35.39 for Black residents, 36.59 for Hispanic residents, 38.50 for Asian or Pacific Islander residents, and 42.1 for Native American residents. Regionally, residents living below the poverty line experience similar environmental health conditions, with index values of 42.92 for White residents, 29.96 for Black residents, 34.45 for Hispanic residents, 34.19 for Asian or Pacific Islander residents, and 35.99 for Native American residents.

For all populations, the index values have improved dramatically since 2019. This is likely in part to a reduced number of commuters resulting from the COVID-19 pandemic.

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

As explained above, disparities in Environmental Health Index values are most pronounced at the regional level. The more suburban and rural areas of Loudoun and Prince William Counties—which are also disproportionately White—have the highest access to environmentally healthy neighborhoods. Washington, D.C., followed closely by Arlington and Alexandria, have much larger populations of non-White residents and have the lowest access to environmentally healthy neighborhoods. Regional values, incorporating suburban and rural areas, are about three times as high as those in urban areas.

District of Columbia

Environmental Health Index values do not seem to follow racial and ethnic patterns within the District. Values tend to increase as one gets farther from downtown, with the highest Environmental Health Indexes, ranging from 20 to 30, in Georgetown, the upper northwest corner of the city, and Anacostia. While Georgetown and areas west of Rock Creek are predominantly White, Anacostia is disproportionately Black compared to the rest of the city. In Anacostia, which has some of the highest values in the District, Black residents make up roughly 90 percent of the population. It is also where most of the city's R/ECAPs are concentrated. The District's population of non-US-born residents is located primarily in the northwest, predominantly in areas with high access to Environmental Health.

Region

Overall, Environmental Health Index scores are significantly higher in suburban and rural areas, like Loudoun, Prince William, Fairfax, and Montgomery Counties, which are disproportionately White, and to a lesser extent, Asian and Pacific Islander. More urban areas, specifically D.C. proper, have much higher percentages of Black and Hispanic residents and lower access to Environmental Health. Within these urban areas, however, it does not appear that EHI values are correlated by race.

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

District of Columbia

As noted above, Black, Hispanic, and Native American residents have higher access to environmentally healthy neighborhoods than do the White residents of the District. However, the Environmental Health Index is just one of the many measures of environmental safety, and historically, Black and Hispanic neighborhoods have borne the brunt of environmental harms and the detrimental effects of climate change. Ward 5, for example, a predominantly Black neighborhood, is home to half of the city's industrial zone. These environmental disparities will become only more defined in the coming years, as increased risk of floods will disproportionately affect neighborhoods east of the Anacostia River, where the population comprises 90 percent Black residents.

The District has acknowledged that environmental harms disproportionately fall on Black and Hispanic residents. The city's Department of Energy and Environment has even established an equity framework for addressing these disparities. But the city only recently put forth this framework in October 2021, and it was lacking any specifics about funding and program policies. It remains to be seen whether this framework will be borne out in practice.

Region

Although the Environmental Health Index does not reflect significant disparities in access to environmentally healthy neighborhoods within the District of Columbia, there are several significant environmental problems within the city that affect vulnerable populations. The region has consistently ranked in the top 10 worst cities in terms of air pollution. According to the 2022 American Lung Association *State of the Air* report, the District of Columbia received an "F" grade for high ozone (smog) days.¹⁴

The Anacostia and Potomac Rivers are also severely polluted. A goal of achieving a swimmable and fishable Anacostia River has been set for the year 2025.¹⁵ However, some residents of Ward 8 (Anacostia) have expressed concerns that as the river is targeted for cleanup, housing prices will rise and gentrification pressures will push out low-income communities of color.¹⁶

f. **Disparities in Access to Opportunity—Patterns in Disparities in Access to Opportunity**

i. ***Describe any disparities in access to opportunity in the jurisdiction and the region, including any overarching patterns of access or exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs.***

Throughout the metropolitan Washington region, there are marked disparities in access to opportunity based on race and ethnicity. For almost all indexes, regional values are lower for Black and Hispanic residents than they are for White residents, and to a lesser extent, Asian American residents. Native American residents often fall somewhere between these groups, with some exceptions. And these disparities are only exacerbated for the population living below the poverty line.

Black residents throughout the region have the lowest levels of access to education, jobs, low-poverty neighborhoods, and environmentally healthy neighborhoods. With few exceptions, this is only worse for Black residents living below the poverty line. The notable exception to this is transit, for which Black residents have the highest levels of access. But this, of course, is a function of needing transit to reach school and work, as Black residents are less likely to live in low-poverty or environmentally healthy neighborhoods, which are further from the District and tend to be inhabited by those with cars. This general pattern, though to a slightly lesser extent, applies to Hispanic residents throughout the region as well.

White residents, and to a lesser extent, Asian American residents, consistently scored the highest on all metrics. White residents had the most access to proficient schools, low-poverty neighborhoods, and environmentally healthy neighborhoods. In job-related indexes, White residents closely followed Asian American residents in levels of access to jobs and the labor market. For schools and low-poverty neighborhoods, Asian Americans had second-best access, and third-best access to environmentally friendly neighborhoods. Asian American residents had the highest job index-related values, but in other metrics were consistently second to White residents.

The level of access for each racial group, from most to least, to each of the opportunity indicators is as follows:

- Schools: White, Asian, Native American, Hispanic, Black (same below poverty line)
- Labor market: Asian, White, Native American, Hispanic, Black (same below poverty line)
- Job proximity: Asian, White, Hispanic, Native American, Black (below poverty line, Hispanic and White drop to lowest)
- Transit trips index: Hispanic, Asian, Black, Native American, White (same below poverty line, but Black moves to highest)
- Transit costs: roughly the same for all
- Low-poverty neighborhoods: White, Asian, Native American, Hispanic, Black (same below poverty line)
- Environmentally friendly neighborhoods: White, Native American, Asian, Hispanic, Black

ii. ***Based on these opportunity indicators, identify areas that experience (1) high access and (2) low access across multiple indicators.***

To answer this question, it is helpful to separate these indicators into two groups, the first group including indexes correlating positively with urban areas, and the second with those correlating with suburban areas. The first group includes both of the transportation indexes and job proximity. It also includes labor markets, though to a slightly lesser extent. Even within these urban jurisdictions, however, job-related metrics are still lower for Black and Hispanic residents. As explained, the high access to transportation is a function of necessity, not convenience. On these measures, the District of Columbia typically scores the highest and Loudoun County the lowest.

The second group includes indexes on which suburban counties fare well, like access to proficient schools, environmentally healthy neighborhoods, and low-poverty neighborhoods. Here, suburban counties like Loudoun, and to a lesser extent, Montgomery and Fairfax, have high index values. Loudoun County has lower values for the indexes that correlate to more urban environments. Conversely, District residents, particularly Black residents, consistently have the least access to proficient schools, environmentally healthy neighborhoods, and low-poverty neighborhoods

iv. Disproportionate Housing Needs

1.a. Which groups (by race/ethnicity and familial status) experience higher rates of housing cost burden, overcrowding, or substandard housing compared with other groups? Which groups also experience higher rates of severe housing burdens compared with other groups?

Across the metropolitan Washington region, many residents face high rates of housing problems, severe housing problems, and severe housing cost burden. The four HUD-designated housing problems include (1) lacking complete kitchen facilities, (2) lacking complete plumbing facilities, (3) overcrowding, and (4) experiencing housing cost burden.¹⁷ Households are considered to have a housing problem if they experience at least one of the above. This analysis also considers what HUD designates as severe housing problems, which include lacking a kitchen or plumbing, housing more than one person per room, or experiencing severe cost burden, defined as housing cost of greater than 50 percent of household income.

Table 21: Demographics of Households with Disproportionate Housing Needs, District of Columbia

Households Experiencing Any of the Four Housing Problems	Households with Problems #	Total Households #	Households with Problems %
Race/Ethnicity			
White, Non-Hispanic	31,375	113,155	27.73%
Black, Non-Hispanic	54,770	122,420	44.74%
Hispanic	11,955	23,885	50.05%
Asian or Pacific Islander, Non-Hispanic	3,965	10,380	38.20%
Native American, Non-Hispanic	309	653	47.32%
Other, Non-Hispanic	2,169	6,064	35.77%
Total	104,530	276,545	37.80%

Household Type and Size			
Family, <5 people	33,485	106,550	31.43%
Family, 5+ people	7,070	14,555	48.57%
Non-family	63,975	155,445	41.16%
Households Experiencing Any of the Four Severe Housing Problems	Households with Severe Problems #	Total Households #	Households with Severe Problems %
Race/Ethnicity			
White, Non-Hispanic	14,665	113,155	12.96%
Black, Non-Hispanic	32,765	122,420	26.76%
Hispanic	8,360	23,885	35.00%
Asian or Pacific Islander, Non-Hispanic	2,125	10,380	20.47%
Native American, Non-Hispanic	189	653	28.94%
Other, Non-Hispanic	1,238	6,064	20.42%
Total	59,350	276,545	21.46%

The racial gap in housing that meets people’s needs is pronounced in D.C.; in the District, Black, Hispanic, and Native American residents are more likely to experience housing problems than are White residents. Approximately one-half of Hispanic, Black, and Native American households face housing problems. Families with five or more members and nonfamily households are almost twice as likely to experience housing problems compared to families with fewer than five members. Similarly, severe housing problems are more likely to be faced by Hispanic, Black, and Native American residents.

Table 22: Demographics of Households with Severe Housing Cost Burden, District of Columbia

Race/Ethnicity	Households with Severe Cost Burden #	Total Households #	Households with Severe Cost Burden %
White, Non-Hispanic	12,940	113,155	11.44%
Black, Non-Hispanic	28,785	122,420	23.51%
Hispanic	5,435	23,885	22.75%
Native American, Non-Hispanic	180	653	27.57%

Other, Non-Hispanic	1,110	6,064	18.30%
Total	50,095	276,545	18.11%
Household Type and Size			
Family households, <5 people	15,654	106,550	14.69%
Family households, 5+ people	2,125	14,555	14.60%
Non-family households	32,310	155,445	20.79%

In D.C., Black, Hispanic, and Native American households experience higher housing cost burden than White and Asian American households. While roughly 1 in 10 White households are cost burdened, approximately one-quarter of Native American, Black, and Hispanic households are cost burdened. Unlike the cost burden disparities based on race, the disparities by household composition are less pronounced, with one-fifth of nonfamily households' being severely cost burdened compared to approximately 15 percent of family households. Unlike in most other jurisdictions, large families are not significantly more likely to face severe cost burden than are smaller families.

Table 23: Demographics of Households with Disproportionate Housing Needs, Region

Households Experiencing Any of the Four Housing Problems	Households with Problems #	Total Households #	Households with Problems %
Race/Ethnicity			
White, Non-Hispanic	290,379	1,146,249	25.33%
Black, Non-Hispanic	228,930	547,575	41.81%
Hispanic	116,643	229,029	50.93%
Asian or Pacific Islander, Non-Hispanic	63,849	184,508	34.61%
Native American, Non-Hispanic	1,912	4,987	38.34%
Other, Non-Hispanic	18,138	48,608	37.31%
Total	719,855	2,160,990	33.31%
Household Type and Size			
Family, <5 people	331,440	1,195,683	27.72%
Family, 5+ people	95,644	230,517	41.49%
Non-family	292,760	734,793	39.84%

Households Experiencing Any of the Four Severe Housing Problems	Households with Severe Problems #	Total Households #	Households with Severe Problems %
Race/Ethnicity			
White, Non-Hispanic	125,471	1,146,249	10.95%
Black, Non-Hispanic	116,013	547,575	21.19%
Hispanic	68,070	229,029	29.72%
Asian or Pacific Islander, Non-Hispanic	33,791	184,508	18.31%
Native American, Non-Hispanic	1,040	4,987	20.85%
Other, Non-Hispanic	8,829	48,608	18.16%
Total	353,250	2,160,990	16.35%

Table 24: Demographics of Households with Severe Housing Cost Burden, Region

Race/Ethnicity	Households with Severe Cost Burden #	Total Households #	Households with Severe Cost Burden %
White, Non-Hispanic	112,920	1,146,249	9.85%
Black, Non-Hispanic	100,254	547,575	18.31%
Hispanic	45,579	229,029	19.90%
Asian or Pacific Islander, Non-Hispanic	25,257	184,508	13.69%
Native American, Non-Hispanic	809	4,987	16.22%
Other, Non-Hispanic	7,588	48,608	15.61%
Total	292,407	2,160,990	13.53%
Household Type and Size			
Family, <5 people	130,274	1,195,683	10.90%
Family, 5+ people	25,636	230,517	11.12%
Non-family	136,547	734,793	18.58%

The metropolitan Washington region includes slightly more than 2 million households. Overall, one-third of these households have housing problems. When evaluated by race and familial status, housing needs are disproportionately borne by households of color, particularly Hispanic and Black households, as well as non-family households and families with five or more members. As is the case in every regional jurisdiction except for Fairfax County, Hispanic households have the most disproportionate rate of housing problems compared with White households. Black households also face similar disparities throughout the region. The highest rate of Hispanic households with housing problems is in Gaithersburg, where more than 60 percent have housing problems. Another group vulnerable to housing problems are families with five or more members. This disparity is most pronounced in Alexandria, where over 63 percent of these households have housing problems.

Regionally, while one-quarter of White households have housing problems, at least one out of every three households of color have them. Among some racial and ethnic groups, the proportion of households experiencing housing problems is even more pronounced: for example, 50 percent of Hispanic households and 40 percent of Black households have housing problems. Asian American, Native American, and other groups also have higher rates of housing problems than White households. Approximately 40 percent of households with five or more members and non-family households also face housing problems.

This trend is the same for households facing severe housing problems. Hispanic households are almost three times more likely to have severe housing problems than White households, and Black households and Native American households are more than twice as likely to have severe housing problems.

There is also a pattern of racially imbalanced housing cost burdens on the regional level that parallels the jurisdictional trends. In most jurisdictions, Hispanic households have the highest rates of cost burden, although in the District of Columbia and Loudoun County, Native Americans shoulder the highest cost burden while comprising a very small share of the population. White households have the lowest cost burden, with fewer than 10 percent burdened. Housing cost burden predominantly harms Black, Hispanic, and Native American households. The jurisdiction with highest rate of severe cost burdens for residents is the District of Columbia. Fairfax and Montgomery Counties also have high rates of households burdened with severe housing costs. Non-family households are also disproportionately impacted by housing cost burden while small family households have lower rates of housing cost burden.

Overcrowding

Table 25: Overcrowded Households by Race or Ethnicity

	Non-Hispanic White Households		Black Households		Native American Households		Asian or Pacific Islander Households		Hispanic Households	
	#	%	#	%	#	%	#	%	#	%
District of Columbia	970	0.93	3,430	2.75	18	2.04	418	4.46	3,073	15.84
Region	7,385	0.66	13,321	2.49	273	3.60	7,094	4.26	22,597	11.37

District of Columbia

Both Black and Hispanic households are more likely than other groups to live in overcrowded conditions. Hispanic households have the highest rate of overcrowded conditions, with at least 15 percent living this way.

Region

Regionally, regardless of race and ethnicity, most households have fairly low rates of overcrowding. Still, a disparity exists in the proportion of White households with overcrowding compared with other groups. This is particularly true for Hispanic households, which have disproportionate rates of overcrowding in every single jurisdiction. At least 11 percent of Hispanic households live in overcrowded housing, more than 10 percentage points higher than White households. The issue of overcrowding is most pronounced in D.C., where at least 15 percent of Hispanic households live in overcrowded housing.

Table 26: Substandard Conditions by Housing Tenure

Jurisdiction	Owner-Occupied One Condition	Owner-Occupied Two Conditions	Owner-Occupied Three Conditions	Owner-Occupied Four Conditions	Owner-Occupied No Conditions	Total
District of Columbia	26,163	476	19	0	91,709	118,367
Regional	254,458	5,207	333	7	865,348	1,125,353

Jurisdiction	Renter-Occupied One Condition	Renter-Occupied Two Conditions	Renter-Occupied Three Conditions	Renter-Occupied Four Conditions	Renter-Occupied No Conditions	Total
District of Columbia	70,383	4,468	99	17	91,052	166,019
Regional	312,493	26,163	746	70	378,231	717,703

Jurisdiction	One Condition	Two Conditions	Three Conditions	Four Conditions	No Conditions	Total
District of Columbia	96,546	4,944	118	17	182,761	284,386
Regional	566,951	31,370	1,079	77	1,243,579	1,843,056

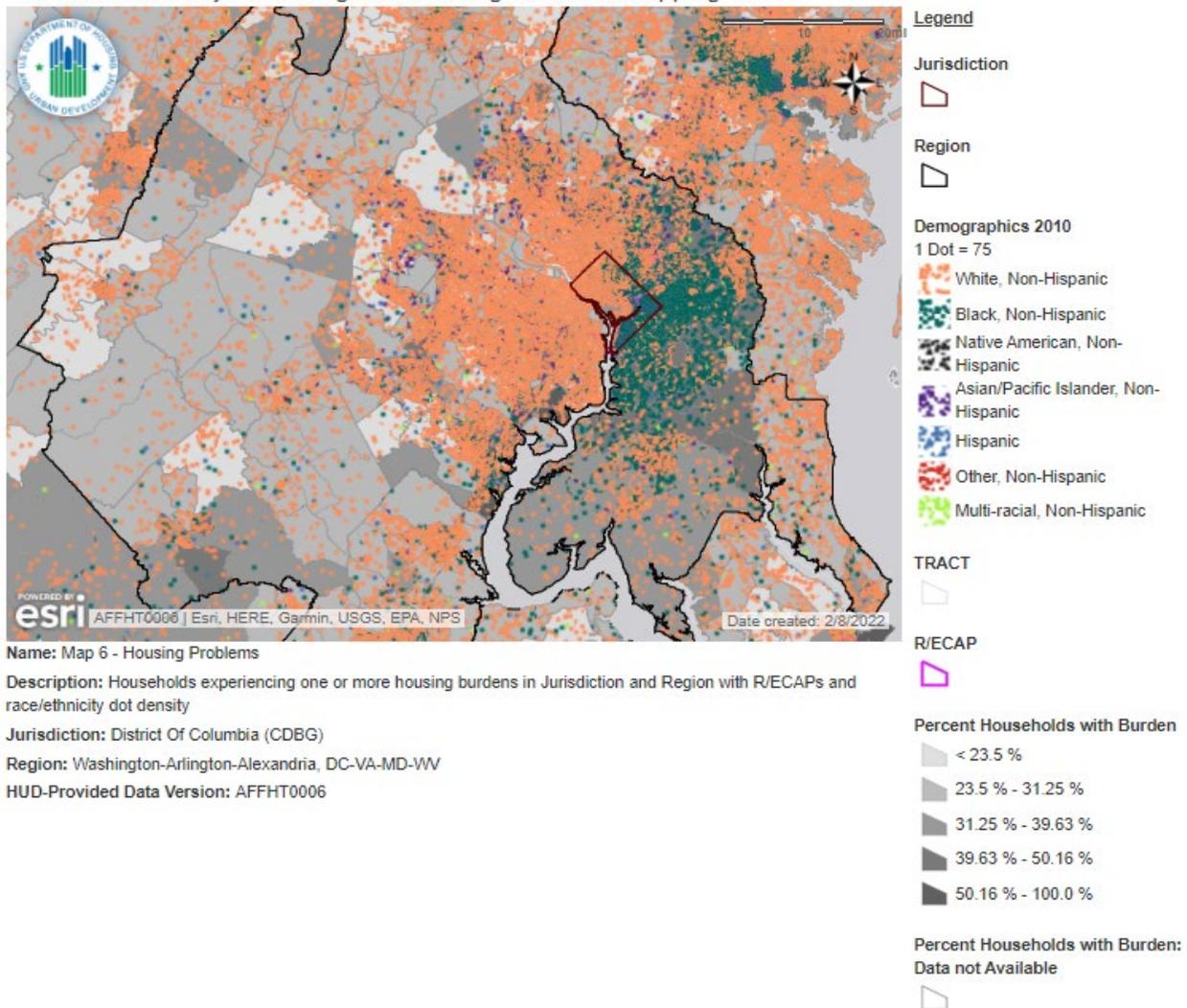
In the region, renters are more likely to experience substandard conditions than owners. Of the more than 1 million owner-occupied households, over three-quarters experience no substandard conditions and fewer than 1 percent have two, three, or four substandard conditions. Slightly more than one-half of all renter households have no substandard conditions, and almost 4 percent have two, three, or four substandard conditions. Renter-occupied households in Alexandria and Arlington and Loudoun Counties are least likely to experience substandard housing conditions.

All jurisdictions have a similarly low rate of substandard housing conditions for owner-occupied households, ranging from the lowest in Arlington and Loudoun Counties at under one-fifth to the highest in Gaithersburg and Prince William County, where approximately one-quarter of owner-occupied households have one or more substandard conditions.

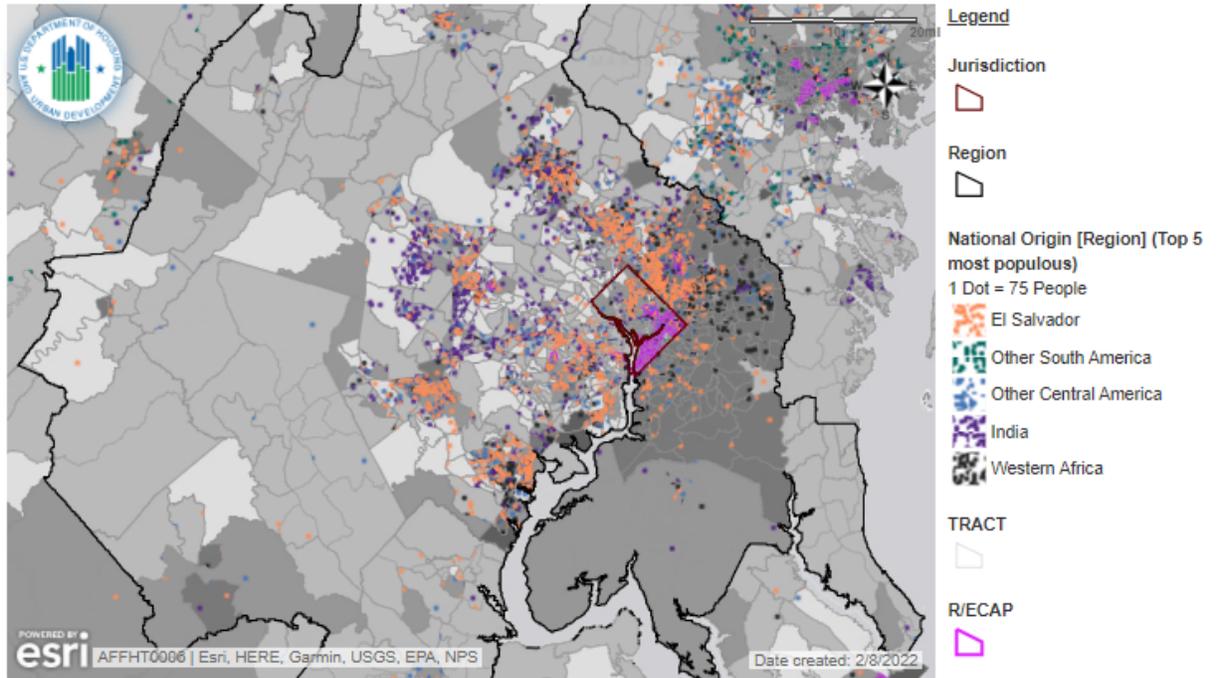
Among renter-occupied households, almost one-half have one or more substandard housing condition in Gaithersburg, Montgomery County, and Prince William County. Renter-occupied households in Alexandria, Arlington and Loudoun Counties are least likely to experience substandard housing conditions.

1.b. Which areas in the jurisdiction and the 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?

Map 72: Households with Any of the Four Housing Problems by Race/Ethnicity, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

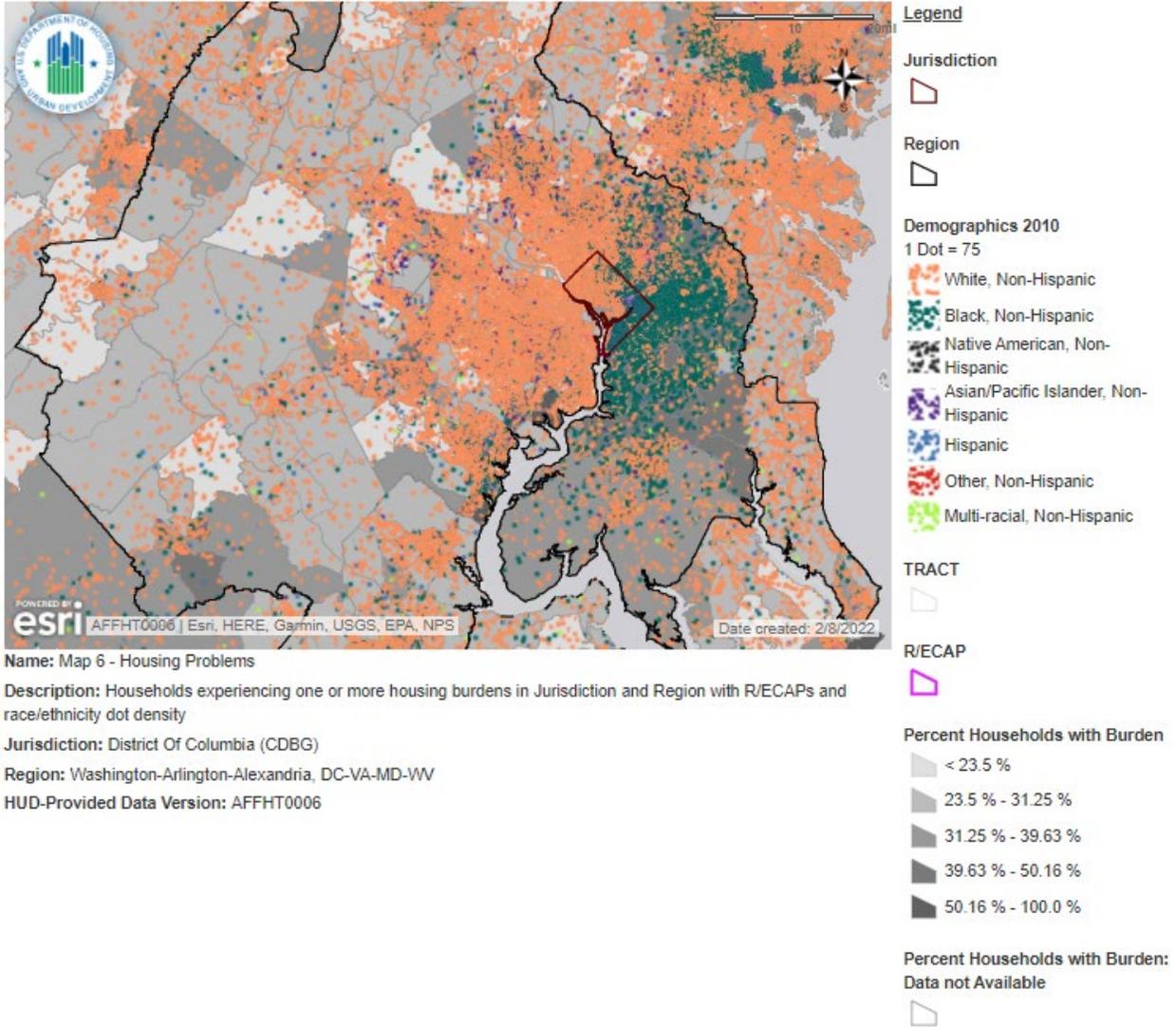


Map 73: Households with Any of the Four Housing Problems by National Origin, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



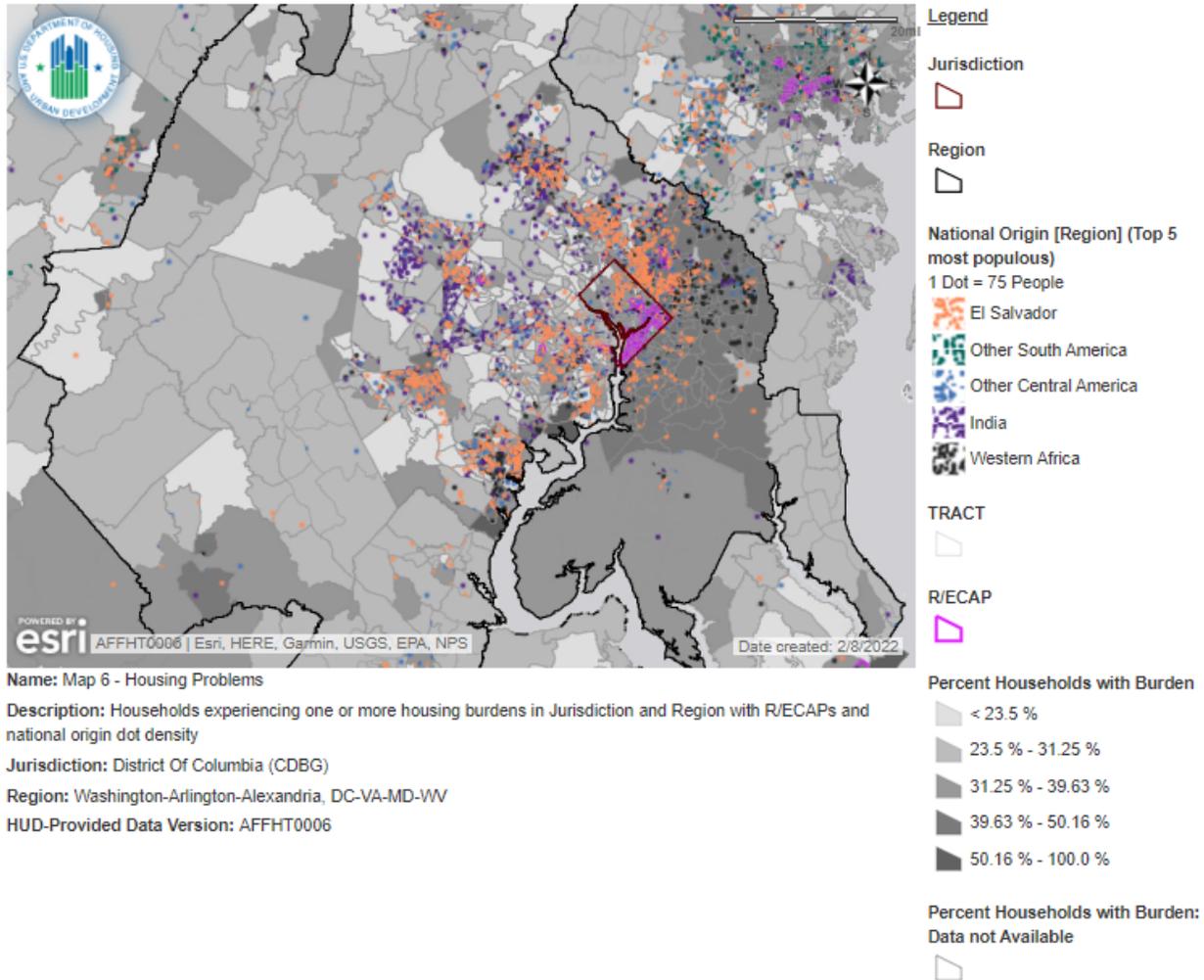
There is a regional split in the racial distribution of household problems that reflects the region’s overall demographics. Households with problems tend to be concentrated in the east and southeast portions of the region, which are overwhelmingly Black. Towards the center of the region, the number of households with problems becomes increasingly concentrated. This uneven distribution may in part be explained by the fact that these more centralized jurisdictions have higher populations and older housing stock. This regional pattern closely resembles the jurisdictional ones because for the most part, the distribution of household problems is concentrated in certain parts of the area rather than forming an evenly distributed pattern. Overall, while White households in all of the jurisdictions except for the D.C. form the plurality racial or ethnic group and constitute 53 percent of the total regional population, households of color are disproportionately represented when their relative population size is accounted for. National origin groups, which are dominated by Indians and El Salvadorans, tend to be distributed towards the eastern half of the region. The high proportion of El Salvadoran households closely follows the patterns for each jurisdiction, but prevalence of Indian households appears to be most prominent in Loudoun County.

Map 74: Households with Any of the Four Housing Problems by Race/Ethnicity, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 6 - Housing Problems
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density
Jurisdiction: District Of Columbia (CDBG)
Region: Washington-Arlington-Alexandria, DC-VA-MD-WV
HUD-Provided Data Version: AFFHT0006

Map 75: Households with Any of the Four Housing Problems by National Origin, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



There is a regional split in the racial distribution of housing problems that reflects the region’s overall demographics. Households with housing problems tend to be concentrated in the east and southeast portions of the region, which are overwhelmingly Black. Toward the center of the region, the number of households with problems becomes increasingly concentrated. This uneven distribution may in part be explained by the fact that these more centralized jurisdictions have higher populations and older housing stock. This regional pattern closely resembles the jurisdictional patterns because, for the most part, the distribution of households with housing problems is concentrated in certain parts of the area rather than forming an evenly distributed pattern. Overall, while White households in all of the jurisdictions except for the District of Columbia form the plurality racial or ethnic group and constitute 53 percent of the total regional population, households of color are disproportionately represented when their relative population size is accounted for. National origin groups, which are dominated by Indians and Salvadorans, tend to be distributed toward the eastern half of the region. The high proportion of Salvadoran households closely follows the patterns for each jurisdiction, but prevalence of Indian households appears to be most prominent in Loudoun County.

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 the jurisdiction and region.

Table 27: Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

District of Columbia	Households in 0–1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	2,904	49.1%	1,467	24.8%	1,532	25.9%	1,664	28.1%
Project-Based Section 8	4,495	48.9%	3,521	38.3%	1,143	12.4%	3,527	38.3%
Other Multifamily	445	86.6%	16	3.11%	12	2.3%	5	1.0%
HCV Program	4,593	38.0%	3,804	31.5%	3,695	30.1%	4,199	34.8%

District of Columbia

Public housing and the HCV program provide the greatest number of units that can accommodate large families. Project-based Section 8 and other multifamily assisted developments have a high preponderance of smaller units. More than 86 percent of other multifamily assisted housing and almost one-half of all public housing and project-based Section 8 units have zero or one bedrooms, making them unsuitable for most families.

Region

There are not enough publicly supported housing units in the region, resulting in a lack of sufficient affordable housing, particularly for families. In most jurisdictions, HCVs offer the most adequate publicly supported housing for families in need. In contrast, project-based Section 8 units do not offer much—or sometimes any—housing opportunity for families, and it is likely that many developments are restricted to seniors. There is a clear need for more affordable housing units for families instead of HCVs alone.

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

Table 28: Housing Tenure by Race

			District of Columbia	Region
White, Non- Hispanic	Owner- Occupied	#	51,911	820,608
		%	50	73.3
	Renter-Occupied	#	51,951	299,248
		%	50	26.7
Hispanic	Owner- Occupied	#	5,601	99,296
		%	28.9	50
	Renter-Occupied	#	13,802	99,442
		%	71.1	50
Black	Owner- Occupied	#	48,205	277,586
		%	38.6	51.8
	Renter-Occupied	#	76,664	257,980
		%	61.4	48.2
Native American	Owner- Occupied	#	294	4,269
		%	33.4	56.3
	Renter-Occupied	#	587	3,311
		%	66.6	43.7
Asian or Pacific Islander	Owner- Occupied	#	3,650	112,704
		%	39.1	67.7
	Renter-Occupied	#	5,681	53,821
		%	60.9	32.3

Table 29: Population Growth by Housing Type

Jurisdiction	Owner-occupied	Renter-Occupied
District of Columbia	6%	14%

District of Columbia

The same trends between racial groups are present in D.C. The proportion of White owner-occupied versus White renter-occupied households is divided 50-50. More than 70 percent of Hispanic households and more than 60 percent of Black households rent. Native American and Asian American households also are more likely to rent than own their homes.

Region

Throughout the region, at least 50 percent of all households, irrespective of race, live in owner-occupied housing. White residents have the highest rate of owner-occupied households at 73 percent, and Asian American have the second highest at 67 percent. Although in several counties Hispanic households have higher rates of home ownership than Black households, in the region as a whole, they have the lowest rate of homeownership. As is the general trend on a jurisdiction-by-jurisdiction basis, White households have much higher rates of homeownership than households of color, particularly Hispanic and Black households.

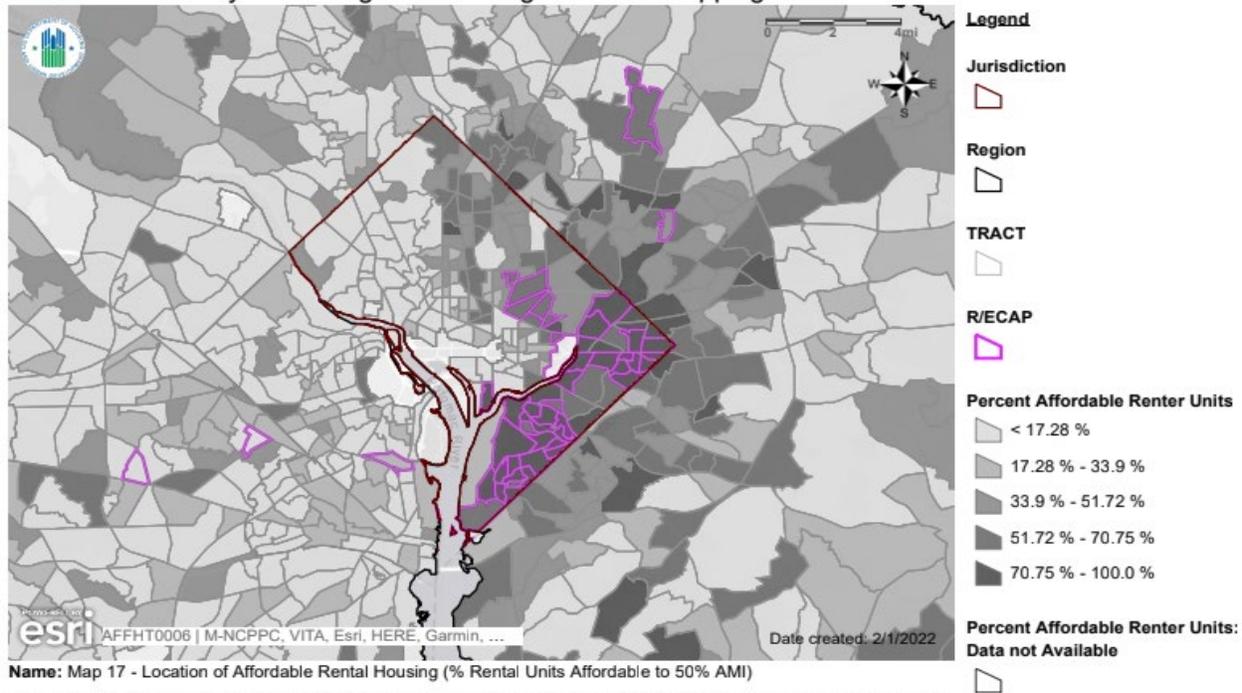
Additional Information

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

Spatial Distribution and Availability of Affordable Housing

Affordable rental housing is defined as a unit renting at or less than 30 percent of household income for a household with income at 50 percent of the AMI.

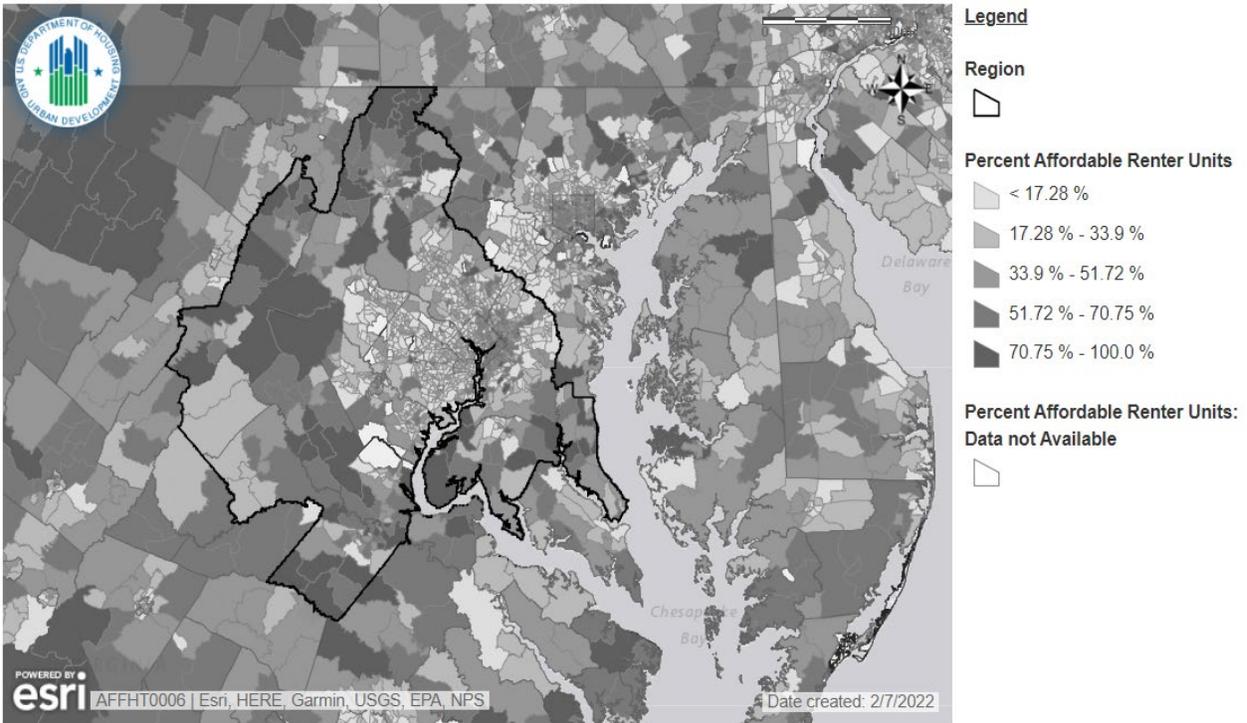
Map 76: Location of Affordable Rental Housing, District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



The distribution of affordable housing in D.C. is significantly uneven. Almost the entire western part of the jurisdiction has less than 17 percent of housing stock that is affordable. The majority of affordable housing is in the eastern side of the city, with larger concentrations of affordable housing in the southeast area. These areas with concentrated affordable housing tracts are also situated in R/ECAP areas.

Map 77: Location of Affordable Rental Housing, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

The region’s rental housing stock that is affordable to low-income households—regardless of subsidy status—is concentrated on the edges of the metropolitan area. Some affordable rental units exist in the center of some jurisdictions, although the centers of the District of Columbia and Fairfax and Montgomery Counties have a greater concentration of households with housing cost burdens. Affordable housing that is available in this central area tends to be concentrated in R/ECAP areas. Otherwise, the largest supply of affordable housing is located on the periphery.

C. Publicly Supported Housing Analysis

Data note: Some of the tables and maps in this section are sourced from the HUD tool, which used 2011–2015 five-year ACS data. These maps and tables are accessible to all and can be used by anyone to numerically and spatially analyze their jurisdictions or communities of interest. Other tables and maps that the Urban Institute created are based off of 2015–2019 five-year ACS estimated data. Due to this, some of the maps identify different census tracts as R/ECAPs and reflect slightly different demographic data.

1. Publicly supported housing demographics

Table 30: Publicly Supported Housing Units by Program Category

District of Columbia	#	%
Total housing units	296,719	-
Public Housing	8,299	2.80%
Project-Based Section 8	9,817	3.31%
Other Multifamily	542	0.18%
HCV Program	15,384	5.18%

District of Columbia

In the District, there are public housing units, project-based Section 8 units, other multifamily assisted housing units, and HCV users. Overall, 11.47 percent of households reside in units assisted with federal tenant-based or project-based subsidies. That is, by far, the highest proportion of publicly supported housing of any jurisdiction included in this analysis. HCVs are the most prominent source of publicly supported housing units in the District, followed by project-based Section 8 housing.

Region

Across the jurisdictions, approximately 4 percent of households reside in units assisted with federal tenant-based or project-based subsidies. In every jurisdiction, HCVs are the most prominent source of publicly supported housing, followed by project-based Section 8 housing. A majority of the jurisdictions have no public housing units at all. It is clear from these data that while progress is being made, there is still a need for more publicly supported housing in the region.

1.a. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, other multifamily assisted developments, and HCV) in the jurisdiction?

Table 31: Publicly Supported Housing Demographics

District of Columbia	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	312	5.29%	5,352	90.67%	171	2.90%	58	0.98%

Project-Based Section 8	481	5.25%	8,091	88.34%	339	3.70%	232	2.53%
Other Multifamily	33	6.98%	380	80.34%	54	11.42%	6	1.27%
HCV Program	243	2.01%	11,177	92.43%	489	4.04%	166	1.37%
Total Households	113,155	40.92%	122,420	44.27%	23,885	8.64%	10,380	3.75%
0-30% AMI	8,905	13.83%	46,420	72.11%	5,955	9.25%	1,700	2.64%
0-50% AMI	14,645	15.34%	66,495	69.65%	9,870	10.34%	2,450	2.57%
0-80% AMI	19,365	17.02%	77,200	67.84%	11,655	10.24%	3,215	2.83%
Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	503	6.71%	6,532	87.15%	315	4.20%	128	1.71%
Project-Based Section 8	3,501	17.17%	13,201	64.76%	1,182	5.80%	2,408	11.81%
Other Multifamily	449	26.35%	969	56.87%	100	5.87%	181	10.62%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,146,249	53.04%	547,575	25.34%	229,029	10.60%	184,508	8.54%
0-30% of AMI	90,665	33.26%	112,341	41.21%	40,008	14.68%	21,717	7.97%
0-50% of AMI	175,960	34.84%	190,389	37.70%	85,426	16.92%	39,408	7.80%
0-80% of AMI	244,055	36.68%	240,579	36.15%	111,238	16.72%	51,826	7.79%
Note: Numbers presented are numbers of households, not individuals. Data sources: Decennial Census; APSH; CHAS								

District of Columbia

In the District, Black households represent the highest percentage of households using publicly supported housing across the board. Black households occupy at least 80 percent of public housing, project-based Section 8 housing, and other multifamily assisted housing. Black households also account for more than 90 percent of the HCV users in the District. Black households using publicly supported housing are most likely to use HCVs. The second-most-common option for Black households is project-based Section 8 housing. Hispanic households represent the second-highest percentage of occupants of other multifamily assisted housing, and the second-highest percentage of HCV users.

Hispanic households using publicly supported housing are most likely to use HCVs. The second-most-common option for Hispanic households is project-based Section 8 housing. White households represent the second-highest percentage of occupants of public housing. White households using publicly supported housing are most likely to reside in project-based Section 8 housing. The second-most-common option for White households is public housing. Asian or Pacific Islander households represent the smallest percentage of households using publicly supported housing across all types of publicly supported housing. Asian or Pacific Islander households make up no more than 3 percent of residents of public housing, project-based Section 8 housing, and other multifamily assisted housing. Asian or Pacific Islander households also account for less than 1.5 percent of all HCV users in the District. Asian households using publicly supported housing are most likely to reside in project-based Section 8 housing. The second-most-common option for Asian or Pacific Islander households is usage of HCVs. Overall, in the District, Black households are most likely to occupy publicly supported housing by a large margin, while Asian or Pacific Islander households are least likely to occupy publicly supported housing.

Region:

Regionally, the vast majority of households living in publicly supported housing are Black households, despite only accounting for one-quarter of the region's total population. Black households represent the highest percentage of households living in public housing, project-based Section 8 housing, and other multifamily housing. The second-highest number of households living in publicly supported housing are White households, despite accounting for more than half of the region's total population. White households represent the second-highest percentage of households living in public housing, project-based Section 8 housing, and other multifamily housing. The third-highest number of households living in publicly supported housing are Hispanic households, and Asian or Pacific Islander households are least likely to occupy publicly supported housing. Regionally, HCVs are most used type of publicly supported housing assistance in every jurisdiction, often by a large margin.

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

Regional data are not available concerning the demographics of HCV users but are available for other types of publicly supported housing.

District of Columbia

In the District, there is a higher percentage of Black households living in public housing developments than across the region. There is a lower percentage of White households, Hispanic households, and Asian or Pacific Islander households living in public housing developments than regionwide. There is a higher percentage of Black households living in project-based Section 8 housing developments than across the region. There is a lower percentage of White, Hispanic, and Asian or Pacific Islander households living in project-based Section 8 housing developments than regionwide. There is a higher percentage of Black households living in other multifamily assisted housing developments than across the region. There is a lower percentage of White, Hispanic, and Asian or Pacific Islander households living in other multifamily assisted housing developments than across the region. Overall, the District has a much higher percentage of Black households in publicly supported housing compared to the entire region.

1.c. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, other multifamily assisted developments, and HCVs) to the population in general and to those who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction

and the region. Include in the comparison a description of whether there is a higher or lower proportion of groups based on protected class.

District of Columbia

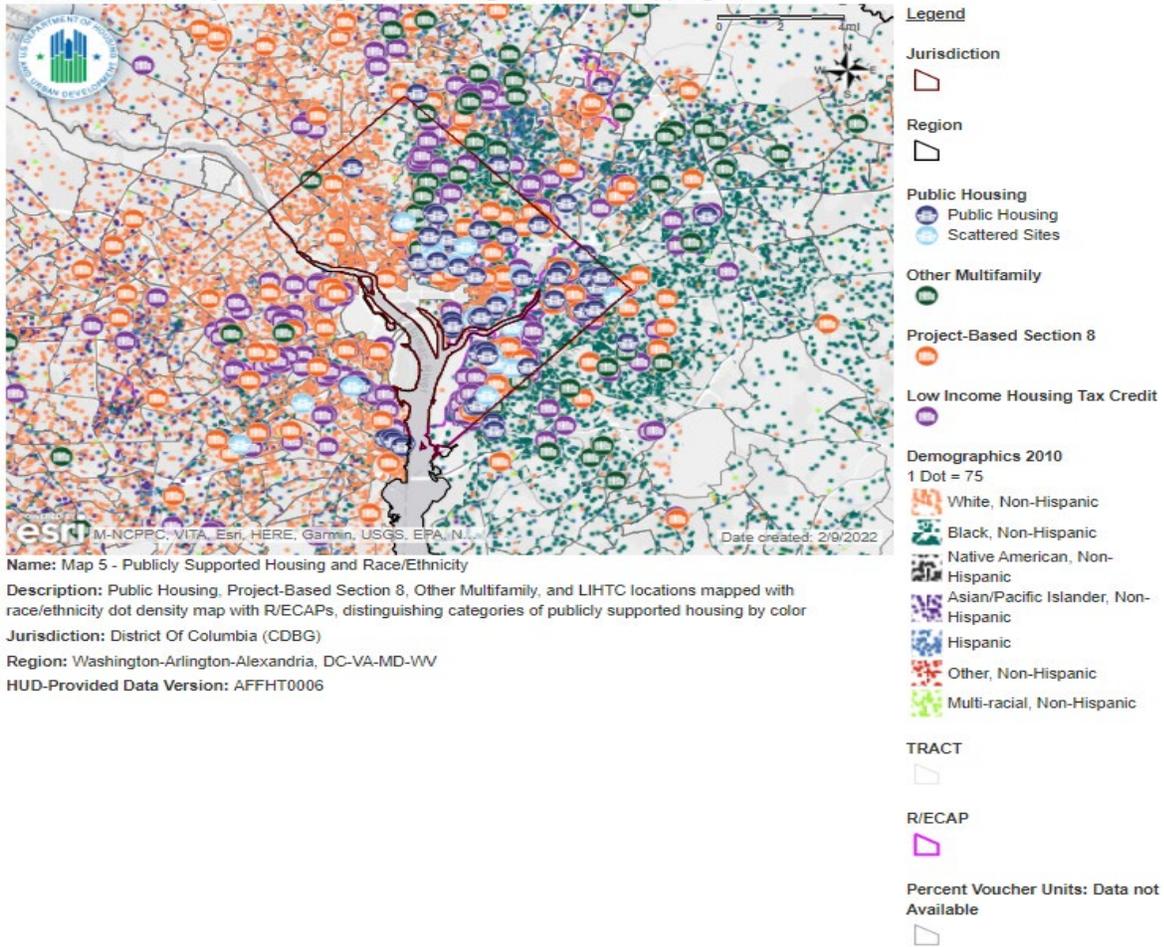
In the District, there is a significantly higher proportion of Black households using HCVs, residing in public housing, residing in project-based Section 8 housing, and residing in other multifamily assisted housing compared to the total number of Black households. There is also a higher proportion of Hispanic households residing in other multifamily assisted housing compared to the total number of Hispanic households. Correspondingly, there is a significantly lower proportion of White households and lower proportion of Asian or Pacific Islander households using HCVs, residing in public housing, residing in project-based Section 8 housing, and residing in other multifamily assisted housing compared to the total number of households in those groups. There is also a lower proportion of Hispanic households using HCVs, residing in public housing, and residing in project-based Section 8 housing compared to the total number of Hispanic households.

When broken down by income eligibility, the overrepresentation of Black households decreases across all publicly supported housing types. The degree of overrepresentation of Hispanic households in other multifamily assisted housing also decreases when controlled for income eligibility. The degree of underrepresentation of White and Asian or Pacific Islander households decreases across all publicly supported housing types when controlled for income eligibility. The degree of underrepresentation of Hispanic households using HCVs, residing in public housing, and residing in project-based Section 8 housing increases when controlled for income eligibility.

2. Publicly Supported Housing Location and Occupancy

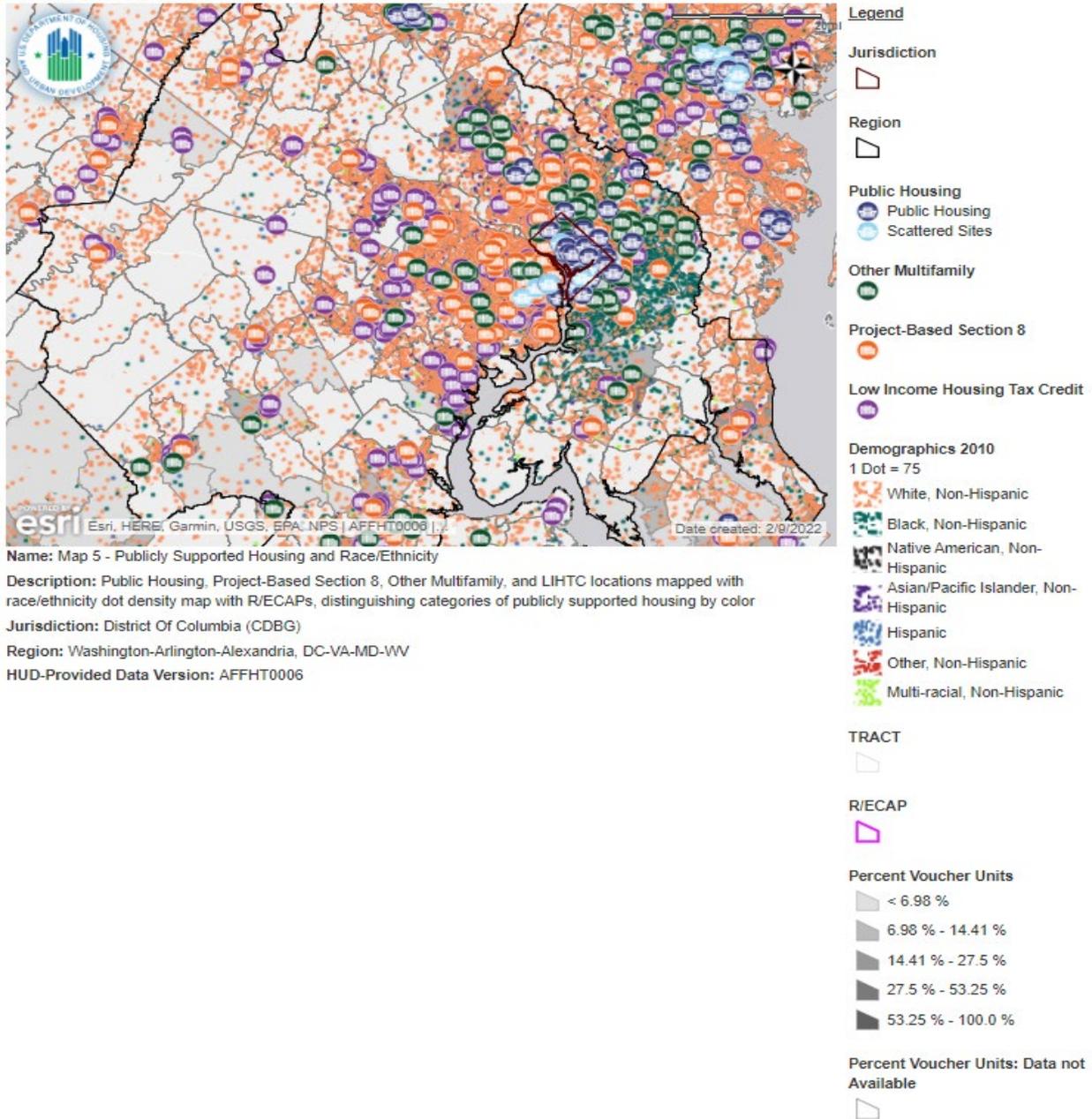
2.a. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, other multifamily assisted developments, HCVs, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and the region.

Map 78: Publicly Supported Housing and Race/Ethnicity, District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



In the District, a majority of publicly supported housing units are located in areas with high Black populations. Publicly supported housing is much less prevalent in Northwest D.C., where the majority of the population is White. Public housing developments in Washington are also largely concentrated near or in the R/ECAPs. The most common types of publicly supported housing in the District are project-based Section 8 developments and Low Income Housing Tax Credit (LIHTC) developments.

Map 79: Publicly Supported Housing and Race/Ethnicity, Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Regionally, much of the publicly supported housing is concentrated near areas with high proportions of Black residents. Publicly supported housing is least likely to be located in areas with high proportions of White residents. The areas with the highest percentage of HCV users also tend to be in areas with higher percentages of Black residents. There is much more publicly supported housing in the eastern portion of the region that is closest to D.C. There is a lack of publicly supported housing in the western and southern portions of the region.

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

District of Columbia

In the District, other multifamily assisted housing serves the highest percentage of elderly residents compared to other types of publicly supported housing. Project-based Section 8 housing serves the highest percentage of families with children. Public housing serves the highest percentage of persons with disabilities. The majority of other multifamily assisted housing, project-based Section 8 housing, and public housing in the District is located in areas with a higher number of Black residents.

2.c. 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 in the jurisdiction and the region?

District of Columbia

In the District, there are public housing developments, project-based Section 8 developments, other multifamily assisted housing, and HCV users located in R/ECAPs. Black residents represent more than 94 percent of the residents in publicly supported housing in R/ECAPs, which is higher than the percentage of Black residents in publicly supported housing outside of R/ECAPs.

Table 32: Publicly Supported Housing Demographics by R/ECAP and Non-R/ECAP Tracts

District of Columbia	Total Units (Occupied) #	White %	Black %	Hispanic %	Asian or Pacific Islander %	Families with Children %	Elderly %	With a Disability %
Public Housing								
R/ECAP tracts	3,074	1.22%	96.59%	1.69%	0.25%	41.35%	N/a	N/a
Non-R/ECAP tracts	3,372	8.91%	85.38%	3.97%	1.63%	16.37%	N/a	N/a
Project-Based Section 8								
R/ECAP tracts	3,880	2.59%	96.43%	0.75%	0.05%	54.59%	N/a	N/a
Non-R/ECAP tracts	5,002	7.67%	81.30%	6.22%	4.63%	24.13%	90.91%	3.39%
Other Multifamily								
R/ECAP tracts	135	3.73%	94.03%	0.75%	1.49%	1.41%	N/a	N/a
Non-R/ECAP tracts	301	8.20%	81.64%	8.85%	1.31%	0.89%	0.00%	N/a
HCV Program								

R/ECAP tracts	6,007	1.03%	96.41%	2.37%	0.07%	36.43%	N/a	N/a
Non R/ECAP tracts	6,047	2.97%	88.50%	5.69%	2.67%	33.07%	31.73%	22.17%
Note: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.								
Data source: APSH.								

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

Table 33: Project-Based Section 8 Publicly Supported Housing Demographics

District of Columbia									
Type	Development Name	PHA Code	PHA Name	Units #	White %	Black %	Hispanic %	Asian %	Households with Children %
Project-Based Section 8	MONTGOMERY CLUB VI	N/a	N/a	22	38.1	42.86	0	19.05	57.14
Project-Based Section 8	FOREST OAK TOWERS	N/a	N/a	175	27.12	7.34	10.17	53.11	N/a
Other Multifamily Assisted Housing	MONTGOMERY HOUSING	N/a	N/a	9	N/a	N/a	N/a	N/a	N/a
Other Multifamily Assisted Housing	ESPERANCE HOUSING	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
Public	HARVARD TOWERS	DC001	DC Housing Authority	189	1.96	93.46	3.92	N/a	0.65
Public	WHEELER CREEK	DC001	DC Housing Authority	100	N/a	N/a	N/a	N/a	N/a
Public	WHEELER CREEK	DC001	DC Housing Authority	48	N/a	N/a	N/a	N/a	N/a

Public	HIGHLAND DWELLINGS	DC0 01	DC Housing Authority	114	0	96.47	3.53	N/a	64.71
Public	BARRY FARMS DWELLINGS	DC0 01	DC Housing Authority	437	N/a	N/a	N/a	N/a	N/a
Public	SIBLEY PLAZA	DC0 01	DC Housing Authority	79	30.88	64.71	2.94	N/a	47.06
Public	ST. MARTIN	DC0 01	DC Housing Authority	51	6.12	93.88	0	N/a	2.04
Public	HENSON RIDGE - PHASE 1	DC0 01	DC Housing Authority	68	1.52	98.48	0	N/a	46.97
Public	SIBLEY PLAZA	DC0 01	DC Housing Authority	170	16	77.33	6.67	N/a	10
Public	LINCOLN HEIGHTS	DC0 01	DC Housing Authority	619	0	99.18	0.54	N/a	50.41
Public	4800 Nannie Helen Burroughs	DC0 01	DC Housing Authority	23	4.35	95.65	0	N/a	39.13
Public	GIBSON PLAZA	DC0 01	DC Housing Authority	53	5.66	26.42	0	67.92	35.85
Public	MONTANA TERRACE	DC0 01	DC Housing Authority	66	1.82	90.91	7.27	N/a	72.73
Public	EDGEWOOD TERRACE SENIORS DEVELOPMENT	DC0 01	DC Housing Authority	89	7.14	78.57	5.95	5.95	N/a
Public	MISSING	DC0 01	DC Housing Authority	50	2	98	0	N/a	72
Public	REGENCY HOUSE	DC0 01	DC Housing Authority	157	11.94	76.87	9.7	1.49	N/a
Public	MISSING	DC0 01	DC Housing Authority	39	7.89	89.47	2.63	N/a	39.47
Public	CAPITOL GATEWAY	DC0 01	DC Housing Authority	62	N/a	N/a	N/a	N/a	N/a
Public	Glenncrest	DC0 01	DC Housing Authority	61	2.08	95.83	2.08	N/a	56.25
Public	BENNING	DC0	DC Housing	280	1.06	97.34	1.6	N/a	44.15

	TERRACE	01	Authority						
Public	WADE APARTMENTS	DC0 01	DC Housing Authority	35	0	100	0	N/a	32.14
Public	FORT LINCOLN	DC0 01	DC Housing Authority	118	2.25	96.63	1.12	N/a	N/a
Public	Parkside Pollin Memorial	DC0 01	DC Housing Authority	42	0	100	0	N/a	36.84
Public	CLARIDGE TOWERS	DC0 01	DC Housing Authority	341	8.58	85.15	6.27	N/a	N/a
Public	HORIZON HOUSE	DC0 01	DC Housing Authority	107	10	81.43	7.14	1.43	N/a
Public	Horizon House UFAS	DC0 01	DC Housing Authority	19	0	94.44	5.56	N/a	11.11
Public	LANGSTON TERRACE	DC0 01	DC Housing Authority	272	0.99	97.04	1.97	N/a	8.87
Public	JAMES APARTMENTS	DC0 01	DC Housing Authority	140	1.85	89.81	8.33	N/a	N/a
Public	JAMES CREEK	DC0 01	DC Housing Authority	236	1.88	97.18	0.94	N/a	38.03
Public	GREENLEAF GARDENS	DC0 01	DC Housing Authority	450	1.39	94.17	3.89	N/a	23.06
Public	SYPHAX GARDENS	DC0 01	DC Housing Authority	168	0	97.89	2.11	N/a	53.52
Public	KENTUCKY COURTS	DC0 01	DC Housing Authority	116	0	98.08	1.92	N/a	0.96
Public	THE AVENUE (PARK MORTON)	DC0 01	DC Housing Authority	27	N/a	N/a	N/a	N/a	N/a
Public	WADE APARTMENTS	DC0 01	DC Housing Authority	20	6.67	93.33	0	N/a	93.33
Public	Sheridan Station Phase III	DC0 01	DC Housing Authority	65	0	100	0	N/a	76.19
Public	OXFORD MANOR	DC0 01	DC Housing Authority	30	4.35	95.65	0	N/a	47.83
Public	Sheridan	DC0	DC Housing	45	4.88	95.12	0	N/a	29.27

	Station Phase I (Multifamily)	01	Authority						
Public	PARK-MORTON APTS	DC001	DC Housing Authority	178	0	93.7	3.94	2.36	42.52
Public	KELLY MILLER DWELLINGS	DC001	DC Housing Authority	159	0	95.38	3.85	0.77	45.38
Public	LEDROIT APARTMENTS	DC001	DC Housing Authority	121	0.96	89.42	9.62	N/a	11.54
Public	GARIFIELD TERRACE	DC001	DC Housing Authority	46	0	93.75	6.25	N/a	71.88
Public	GARIFIELD SENIOR	DC001	DC Housing Authority	226	1.08	92.97	5.41	0.54	N/a
Public	STODDERT TERRACE	DC001	DC Housing Authority	352	0.33	98.33	1	N/a	37.67
Public	KENTUCKY COURTS	DC001	DC Housing Authority	12	0	100	0	N/a	9.09
Public	HOPKINS APTS	DC001	DC Housing Authority	154	28.15	70.37	1.48	N/a	59.26
Public	CARROLL APARTMENTS	DC001	DC Housing Authority	96	0	98.53	1.47	N/a	17.65
Public	CAPPER SENIOR I	DC001	DC Housing Authority	162	N/a	N/a	N/a	N/a	N/a
Public	KENILWORTH COURTS	DC001	DC Housing Authority	289	1.51	97.49	1.01	N/a	53.77
Public	VICTORY SQUARE SENIOR APARTMENTS	DC001	DC Housing Authority	36	2.94	97.06	0	N/a	N/a
Public	WOODLAND TERRACE	DC001	DC Housing Authority	370	0.32	97.41	1.29	0.65	33.33
Public	POTOMAC GARDENS	DC001	DC Housing Authority	339	36.11	60.76	2.78	0.35	35.76
Public	CAPPER SENIOR II	DC001	DC Housing Authority	139	8.7	86.96	0	4.35	8.7
Public	CAPITAL QUARTERS	DC001	DC Housing Authority	90	N/a	N/a	N/a	N/a	N/a

Public	MISSING	DC001	DC Housing Authority	76	10.53	88.16	0	1.32	N/a
Public	JUDICIARY HOUSE	DC001	DC Housing Authority	260	1.42	93.87	3.3	0.94	N/a
Public	Highland Dwellings II	DC001	DC Housing Authority	184	N/a	N/a	N/a	N/a	N/a
Public	MISSING	DC001	DC Housing Authority	24	0	100	0	N/a	N/a
Project-Based Section 8	CLAYPOOLE COURTS	N/a	N/a	122	3.33	93.33	3.33	N/a	56.67
Project-Based Section 8	FAIRMONT I AND II APARTMENTS	N/a	N/a	205	22.93	68.29	4.88	2.93	38.05
Project-Based Section 8	GLENN ARMS APTS	N/a	N/a	45	0	42.22	57.78	N/a	20
Project-Based Section 8	WHEELER TERRACE APARTMENTS	N/a	N/a	112	2.75	97.25	0	N/a	57.8
Project-Based Section 8	1330 7TH STREET APARTMENTS	N/a	N/a	134	0	95.45	3.03	1.52	48.48
Project-Based Section 8	CONGRESS PARK I	N/a	N/a	162	0	100	0	N/a	51.92
Project-Based Section 8	CONGRESS PARK II	N/a	N/a	214	0	99.5	0.5	N/a	67.34
Project-Based Section 8	PARKCHESTER APARTMENTS	N/a	N/a	94	1.1	98.9	0	N/a	47.25
Project-Based Section 8	CARMEL PLAZA NORTH	N/a	N/a	40	0	88.24	0	11.76	35.29
Project-Based Section 8	GOLDEN RULE APARTMENTS	N/a	N/a	183	1.85	97.53	0.62	N/a	44.44

Project-Based Section 8	DELTA TOWERS	N/a	N/a	149	10.22	87.59	2.19	N/a	N/a
Project-Based Section 8	IVY CITY	N/a	N/a	60	1.67	98.33	0	N/a	60
Project-Based Section 8	SAMUEL J. SIMMONS NCBA ESTATES	N/a	N/a	174	20.86	73.01	5.52	0.61	N/a
Project-Based Section 8	CHRISTOPHER PRICE HOUSE AKA BELMONT	N/a	N/a	20	0	90	10	N/a	10
Project-Based Section 8	WOODBERRY APARTMENTS	N/a	N/a	124	29.31	70.69	0	N/a	60.34
Project-Based Section 8	TERRIFIC INN	N/a	N/a	14	0	92.31	0	N/a	N/a
Project-Based Section 8	NORTHWEST CO-OP #15	N/a	N/a	48	10.34	89.66	0	N/a	37.93
Project-Based Section 8	TYLER HOUSE	N/a	N/a	284	1.49	98.14	0	0.37	60.59
Project-Based Section 8	STONERIDGE APTS. SEC II	N/a	N/a	46	0	100	0	N/a	60.47
Project-Based Section 8	BENNING PARK APARTMENTS	N/a	N/a	193	0	100	0	N/a	64.94
Project-Based Section 8	PARK ROAD APARTMENTS	N/a	N/a	150	4.05	45.95	36.49	13.51	N/a
Project-Based Section 8	FRIENDSHIP TERRACE	N/a	N/a	40	57.5	35	5	2.5	N/a
Project-Based Section 8	ASBURY DWELLINGS	N/a	N/a	146	6.52	90.58	2.9	N/a	N/a

Project-Based Section 8	GIBSON PLAZA	N/a	N/a	122	2.42	66.13	5.65	25.81	33.06
Project-Based Section 8	BROOKLAND MANOR AKA BRENTWOOD VILLA	N/a	N/a	373	0.9	96.41	2.4	N/a	40.42
Project-Based Section 8	EDGEWOOD TERRACE I	N/a	N/a	114	0.88	96.46	2.65	N/a	51.33
Project-Based Section 8	GREEN DOOR	N/a	N/a	10	18.18	81.82	0	N/a	N/a
Project-Based Section 8	SECOND NORTHWEST COOPERATIVE NO. 17	N/a	N/a	46	6.9	89.66	0	3.45	44.83
Project-Based Section 8	FRANKLIN COMMONS	N/a	N/a	100	3.16	94.74	2.11	N/a	42.11
Project-Based Section 8	HUNTINGTON VILLAGE	N/a	N/a	202	8.81	91.19	0	N/a	68.91
Project-Based Section 8	ROBERT L WALKER HOUSE	N/a	N/a	68	1.49	97.01	0	N/a	N/a
Project-Based Section 8	MORTON & FLORENCE BAHR TOWERS	N/a	N/a	54	20	78.18	1.82	N/a	N/a
Project-Based Section 8	ELSINORE COURTYARDS (DHAKA HOUSE)	N/a	N/a	12	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	BENNING HEIGHTS	N/a	N/a	148	5.41	93.92	0.68	N/a	43.24
Project-Based Section 8	FORT LINCOLN SENIOR VILLAGE II	N/a	N/a	176	0.57	97.71	1.71	N/a	N/a
Project-Based	FAIRCLIFF PLAZA EAST	N/a	N/a	80	5.06	62.03	32.91	N/a	50.63

Section 8									
Project-Based Section 8	MAYFAIR MANSIONS	N/a	N/a	320	1.36	96.6	1.02	0.34	47.96
Project-Based Section 8	PARADISE AT PARKSIDE	N/a	N/a	261	0.43	97.42	1.72	0.43	46.35
Project-Based Section 8	RITCH HOMES	N/a	N/a	42	4.76	90.48	4.76	N/a	40.48
Project-Based Section 8	HUBBARD PLACE	N/a	N/a	230	3.88	93.97	1.29	0.86	31.9
Project-Based Section 8	OAK STREET APARTMENTS	N/a	N/a	50	0	77.55	20.41	2.04	24.49
Project-Based Section 8	KING TOWERS	N/a	N/a	25	0	72	28	N/a	20
Project-Based Section 8	FORT. LINCOLN SENIOR VILLAGE III	N/a	N/a	304	2.38	96.6	0.68	0.34	N/a
Project-Based Section 8	FORT LINCOLN SENIOR VILLAGE I	N/a	N/a	187	20.77	77.05	2.19	N/a	N/a
Project-Based Section 8	ALLEN HOUSE	N/a	N/a	95	1.08	98.92	0	N/a	N/a
Project-Based Section 8	FORT CHAPLIN PARK APARTMENTS	N/a	N/a	72	5.33	93.33	1.33	N/a	49.33
Project-Based Section 8	ST. MARY'S COURT	N/a	N/a	140	55.8	23.91	9.42	10.14	N/a
Project-Based Section 8	WAH LUCK HOUSE	N/a	N/a	152	1.37	4.11	0	94.52	5.48
Project-Based	TEL COURT COOPERATIVE	N/a	N/a	56	0	100	0	N/a	35.71

Section 8									
Project-Based Section 8	WOODLEY HOUSE	N/a	N/a	6	5.56	88.89	0	N/a	N/a
Project-Based Section 8	COLUMBIA HEIGHTS VILLAGE APTS	N/a	N/a	406	4.36	86.92	7.44	0.51	50.26
Project-Based Section 8	TRINITY TOWERS	N/a	N/a	122	2.56	97.44	0	N/a	32.48
Project-Based Section 8	KENYON APARTMENTS	N/a	N/a	18	0	64.71	35.29	N/a	29.41
Project-Based Section 8	FOREST RIDGE-THE VISTAS	N/a	N/a	80	0	100	0	N/a	74.29
Project-Based Section 8	FOREST RIDGE-THE VISTAS	N/a	N/a	301	1.52	97.35	0.76	N/a	75.38
Project-Based Section 8	GARFIELD HILLS APTS	N/a	N/a	93	5.38	93.55	1.08	N/a	56.99
Project-Based Section 8	THE COVINGTON FAMILY ASSOCIATION, I	N/a	N/a	21	0	38.46	61.54	N/a	7.69
Project-Based Section 8	ST JAMES MUTUAL HOME	N/a	N/a	36	25	70.83	0	4.17	12.5
Project-Based Section 8	LANGSTON LANE	N/a	N/a	118	1.85	98.15	0	N/a	68.52
Project-Based Section 8	EDGEWOOD TERRACE SECTION IV AKA THE	N/a	N/a	103	4.17	93.75	2.08	N/a	31.25
Project-Based Section 8	PAUL LAURENCE DUNBAR APARTMENTS	N/a	N/a	170	15.63	83.13	1.25	N/a	N/a

Project-Based Section 8	CAPITAL MANOR COOPERATIVE	N/a	N/a	19	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	PORTNER FLATS	N/a	N/a	48	4.17	87.5	8.33	N/a	43.75
Project-Based Section 8	STONERIDGE I	N/a	N/a	22	0	100	0	N/a	56.52
Project-Based Section 8	THE GREEN VALLEY APTS	N/a	N/a	72	1.39	97.22	1.39	N/a	N/a
Project-Based Section 8	ANCHOR HOUSING	N/a	N/a	9	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	CHHI HOUSE (OTIS HOUSE)	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	HEDIN HOUSE	N/a	N/a	35	3.03	93.94	3.03	N/a	N/a
Project-Based Section 8	ATLANTIC TERRACE	N/a	N/a	196	0	100	0	N/a	62.94
Project-Based Section 8	FAIRCLIFF PLAZA WEST	N/a	N/a	111	0.92	52.29	46.79	N/a	40.37
Project-Based Section 8	BEECHER COOPERATIVE	N/a	N/a	18	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	FREDERICK DOUGLASS	N/a	N/a	150	0.67	97.99	0.67	N/a	44.97
Project-Based Section 8	MORRIS ROAD	N/a	N/a	30	0	100	0	N/a	83.33
Project-Based Section 8	CARVER HALL APTS.	N/a	N/a	95	0	100	0	N/a	53.13

Project-Based Section 8	GALEN TERRACE	N/a	N/a	84	0	100	0	N/a	63.16
Project-Based Section 8	W STREET APARTMENTS	N/a	N/a	18	58.82	35.29	5.88	N/a	47.06
Project-Based Section 8	FOSTER HOUSE	N/a	N/a	76	8.11	89.19	0	2.7	10.81
Project-Based Section 8	LINCOLN WESTMORELAND I	N/a	N/a	82	2.78	93.06	2.78	1.39	41.67
Project-Based Section 8	ATLANTIC GARDENS	N/a	N/a	108	0	100	0	N/a	74.73
Project-Based Section 8	SOUTHERN HILLS APTS	N/a	N/a	255	0	98.75	0.83	N/a	49.17
Project-Based Section 8	AZEEZE BATES	N/a	N/a	18	0	100	0	N/a	66.67
Project-Based Section 8	BENNING COURTS	N/a	N/a	97	0	98.96	1.04	N/a	62.5
Project-Based Section 8	THE PENTACLE	N/a	N/a	50	0	100	0	N/a	55.32
Project-Based Section 8	CAPITOL HILL TOWERS	N/a	N/a	204	3.03	93.94	2.02	0.51	0.51
Other Multifamily Assisted Housing	DUPONT PARK ADVENTIST APARTMENTS	N/a	N/a	44	0	100	0	N/a	N/a
Other Multifamily Assisted Housing	OTTO B. BERG	N/a	N/a	25	9.09	90.91	0	N/a	9.09
Other Multifamily	KENNEDY INSTITUTE	N/a	N/a	15	N/a	N/a	N/a	N/a	N/a

Assisted Housing									
Other Multifamily Assisted Housing	COLONY HOUSE APARTMENTS	N/a	N/a	57	5.17	89.66	5.17	N/a	N/a
Other Multifamily Assisted Housing	CAPITOL COMMONS	N/a	N/a	40	2.5	95	2.5	N/a	N/a
Other Multifamily Assisted Housing	UPSHUR HOUSE	N/a	N/a	44	11.9	88.1	0	N/a	N/a
Other Multifamily Assisted Housing	54TH STREET CORPORATION	N/a	N/a	8	N/a	N/a	N/a	N/a	N/a
Other Multifamily Assisted Housing	SUNFLOWER HOUSE	N/a	N/a	20	20	25	45	10	15
Other Multifamily Assisted Housing	VICTORY HEIGHTS, INC.	N/a	N/a	75	10.53	69.74	18.42	1.32	N/a
Other Multifamily Assisted Housing	EDGEWOOD TERRACE III	N/a	N/a	73	4.29	91.43	1.43	2.86	N/a
Other Multifamily Assisted Housing	HEARTH FOUNDATION	N/a	N/a	13	N/a	N/a	N/a	N/a	N/a
Other Multifamily Assisted Housing	RILEY-CHEEKS HOUSE, INC.	N/a	N/a	13	N/a	N/a	N/a	N/a	N/a
Other Multifamily Assisted Housing	MERIGOLD PLACE, INC.	N/a	N/a	7	N/a	N/a	N/a	N/a	N/a

Other Multifamily Assisted Housing	NORTH CAPITAL AT PLYMOUTH	N/a	N/a	68	5.8	92.75	0	1.45	N/a
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District of Columbia

In the District, among public housing developments, Gibson Plaza and Potomac Gardens both have a significantly lower percentage of Black residents. Potomac Gardens also has a significantly higher percentage of White residents. Gibson Plaza has a significantly higher percentage of Asian or Pacific Islander residents. Among project-based Section 8 developments, Park Road Apartments; The Covington Family Association, I; and Faircliff Plaza West all have a significantly lower percentage of Black residents and a significantly higher percentage of Hispanic residents. Faircliff Plaza East and Kenyon Apartments also have a significantly higher percentage of Hispanic residents. The W Street Apartments have a significantly higher proportion of White residents and significantly lower proportion of Black residents. Among other multifamily assisted housing, Sunflower House has a significantly lower percentage of Black residents and a significantly higher percentage of Hispanic residents.

2.e. Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and the region.

2.f. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, other multifamily assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, 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.

Table 34: Publicly Supported Housing Demographics and Surrounding Census Tract Demographics, District of Columbia

Type	Development Name	PHA Code	PHA Name	Units #		White %		Black %		Hispanic %		Asian %		Households with Children %		Pover ty Level %
				Devel opme nt	Tract	Devel opme nt	Tract	Tract								
P	HARVARD TOWERS	DC001	DC Housing Authority	189	2,565	2.0	52.7	93.5	13	3.9	22	N/a	5.3	0.7	23.2	6.4
P	WHEELER CREEK	DC001	DC Housing Authority	100	1,309	N/a	1.7	N/a	95	N/a	3	N/a	0	N/a	33.4	30.1
P	WHEELER CREEK	DC001	DC Housing Authority	48	1,309	N/a	1.7	N/a	95	N/a	3	N/a	0	N/a	33.4	30.1
P	HIGHLAN D	DC001	DC Housing	114	864	0.0	0.6	96.5	95.8	3.5	3	N/a	0.6	64.7	35.9	60.6

	DWELLIN GS		Authority													
P	BARRY FARMS DWELLIN GS	DC001	DC Housing Authority	437	1,072	N/a	3.4	N/a	85.9	N/a	2.5	N/a	2.7	N/a	212	68.6
P	SIBLEY PLAZA	DC001	DC Housing Authority	79	2,916	30.9	25.7	64.7	54.4	2.9	4.3	N/a	12.7	47.1	22.9	28.1
P	ST. MARTIN	DC001	DC Housing Authority	51	1,057	6.1	39.2	93.9	51.2	0.0	5.5	N/a	3.3	2.0	11.8	6.3
P	HENSON RIDGE - PHASE 1	DC001	DC Housing Authority	68	1,413	1.5	2.1	98.5	85	0.0	9.7	N/a	0.2	47.0	35.2	14
P	SIBLEY PLAZA	DC001	DC Housing Authority	170	2,916	16.0	25.7	77.3	54.4	6.7	4.3	N/a	12.7	10.0	22.9	28.1
P	LINCOLN HEIGHTS	DC001	DC Housing Authority	619	1,508	0.0	1.4	99.2	93	0.5	0.8	N/a	0.3	50.4	33.7	26.7
P	4800 Nannie Helen Burroughs	DC001	DC Housing Authority	23	1,504	4.4	1.4	95.7	93	0.0	0.8	N/a	0.3	39.1	33.7	26.7
P	GIBSON PLAZA	DC001	DC Housing Authority	53	1,902	5.7	40.5	26.4	42.7	0.0	8	67.9	7	35.9	11.7	16.9
P	MONTANA TERRACE	DC001	DC Housing Authority	66	2,206	1.8	8.7	90.9	79.7	7.3	7.2	N/a	2.2	72.7	23.6	29.3
P	EDGEWOOD TERRACE SENIORS DEVELOPMENT	DC001	DC Housing Authority	89	1,459	7.1	10.1	78.6	78	6.0	9.8	6.0	0	N/a	30.3	21
P	MISSING	DC001	DC Housing Authority	50	1,744	2.0	45.7	98.0	31.9	0.0	17.3	N/a	3.1	72.0	12.1	13.1
P	REGENCY HOUSE	DC001	DC Housing Authority	157	1,600	11.9	63	76.9	9.7	9.7	17.8	1.5	0	N/a	25.9	6.4
P	MISSING	DC001	DC Housing Authority	39	1,744	7.9	45.7	89.5	31.9	2.6	17.3	N/a	3.1	39.5	12.1	13.1
P	CAPITOL GATEWAY	DC001	DC Housing Authority	62	1,706	N/a	0.3	N/a	96.7	N/a	1.3	N/a	0	N/a	36.3	35.5
P	Glenncrest	DC001	DC Housing	61	1,339	2.1	2.7	95.8	85.6	2.1	10.1	N/a	0	56.3	30.6	28.9

			Authority													
P	BENNING TERRACE	DC001	DC Housing Authority	280	1,227	1.1	0.4	97.3	97.5	1.6	2	N/a	0	44.2	34.4	19.9
P	WADE APARTMENTS	DC001	DC Housing Authority	35	1,072	0.0	3.4	100.0	89.9	0.0	2.5	N/a	2.7	32.1	29.7	68.6
P	FORT LINCOLN	DC001	DC Housing Authority	118	2,227	2.3	8.4	96.6	79.3	1.1	8.2	N/a	1.2	N/a	21.3	12
P	Parkside Pollin Memorial	DC001	DC Housing Authority	42	1,937	0.0	2	100.0	89.5	0.0	5.9	N/a	0.3	36.8	27.2	37
P	CLARIDGE TOWERS	DC001	DC Housing Authority	341	3,578	8.6	45.2	85.2	27.3	6.3	16.5	N/a	6.3	N/a	6.6	15
P	HORIZON HOUSE	DC001	DC Housing Authority	107	3,578	10.0	45.2	81.4	27.3	7.1	16.5	1.4	6.3	N/a	6.6	15
P	Horizon House UFAS	DC001	DC Housing Authority	19	3,578	0.0	45.2	94.4	27.3	5.6	16.5	N/a	6.3	11.1	6.6	15
P	LANGSTON TERRACE	DC001	DC Housing Authority	272	1,310	1.0	2.9	97.0	91.6	2.0	0.3	N/a	0	8.9	30.7	83.7
P	JAMES APARTMENTS	DC001	DC Housing Authority	140	4,409	1.9	64.6	89.8	12.7	8.3	13.5	N/a	5.8	N/a	3.4	5
P	JAMES CREEK	DC001	DC Housing Authority	236	1,435	1.9	19	97.2	76.2	0.9	1.9	N/a	0.8	38.0	23.2	35.5
P	GREENLEAF GARDENS	DC001	DC Housing Authority	450	1,435	1.4	19.4	94.2	76.2	3.9	1.9	N/a	0.8	23.1	23.2	35.5
P	SYPHAX GARDENS	DC001	DC Housing Authority	168	1,435	0.0	19.4	97.9	76.2	2.1	1.9	N/a	0.8	53.5	23.2	35.5
P	KENTUCKY COURTS	DC001	DC Housing Authority	116	1,260	0.0	73.3	98.1	15.7	1.9	4.4	N/a	0.9	1.0	24.5	3.5
P	THE AVENUE (PARK MORTON)	DC001	DC Housing Authority	27	1,879	N/a	30.7	N/a	29.3	N/a	28.4	N/a	7.1	N/a	25.9	7.5
P	WADE APARTMENTS	DC001	DC Housing Authority	20	1,072	6.7	3.4	93.3	89.9	0.0	2.5	N/a	2.7	93.3	29.7	68.6
P	Sheridan Station	DC001	DC Housing	65	1,540	0.0	2.2	100.0	94.2	0.0	2.2	N/a	0.6	76.2	36.4	19.9

	Phase III		Authority													
P	OXFORD MANOR	DC001	DC Housing Authority	30	1,540	4.4	2.2	95.7	94.2	0.0	2.2	N/a	0.6	47.8	36.4	19.9
P	Sheridan Station Phase I (Multifamily)	DC001	DC Housing Authority	45	1,540	4.9	2.2	95.1	94.2	0.0	2.2	N/a	0.6	29.3	36.4	19.9
P	PARK-MORTON APTS	DC001	DC Housing Authority	178	1,879	0.0	25.9	93.7	42.6	3.9	27	2.4	3.5	42.5	22.2	17.3
P	KELLY MILLER DWELLINGS	DC001	DC Housing Authority	159	1,381	0.0	31.3	95.4	57.9	3.9	4	0.8	3.2	45.4	21.8	14.7
P	LEDROIT APARTMENTS	DC001	DC Housing Authority	121	1,381	1.0	31.3	89.4	57.9	9.6	4	N/a	3.2	11.5	21.8	14.7
P	GARIFIELD TERRACE	DC001	DC Housing Authority	46	1,400	0.0	24.8	93.8	60.4	6.3	8.5	N/a	3.2	71.9	13.8	18.1
P	GARIFIELD SENIOR	DC001	DC Housing Authority	226	1,400	1.1	24.8	93.0	60.4	5.4	8.5	0.5	3.2	N/a	13.8	18.1
P	STODDERT TERRACE	DC001	DC Housing Authority	352	2,443	0.3	0	98.3	92.2	1.0	6.6	N/a	0.6	37.7	41.6	31.5
P	KENTUCKY COURTS	DC001	DC Housing Authority	12	1,260	0.0	73.3	100.0	15.7	0.0	4.4	N/a	0.9	9.1	24.5	3.5
P	HOPKINS APTS	DC001	DC Housing Authority	154	1,430	28.2	33.3	70.4	51.9	1.5	7.9	N/a	4.3	59.3	28.6	32.8
P	CARROLL APARTMENTS	DC001	DC Housing Authority	96	4,209	0.0	64.8	98.5	20.7	1.5	6	N/a	4.9	17.7	8.7	6
P	CAPPER SENIOR I	DC001	DC Housing Authority	162	3,835	N/a	64.8	N/a	20.7	N/a	6	N/a	4.9	N/a	8.7	6
P	KENILWORTH COURTS	DC001	DC Housing Authority	289	926	1.5	2.6	97.5	96	1.0	1.1	N/a	0	53.8	28.1	32.6
P	VICTORY SQUARE SENIOR APARTMENTS	DC001	DC Housing Authority	36	1,937	2.9	2	97.1	89.5	0.0	5.9	N/a	0.3	N/a	27.2	37
P	WOODLAND	DC001	DC Housing	370	2,124	0.3	0.1558	97.4	98.7	1.3	0	0.7	0	33.3	43.5	37.5

	TERRACE		Authority													
P	POTOMAC GARDENS	DC001	DC Housing Authority	339	1,430	36.1	33.3	60.8	51.9	2.8	7.2	0.4	4.3	35.8	28.6	32.8
P	CAPPER SENIOR II	DC001	DC Housing Authority	139	3,835	8.7	64.8	87.0	20.7	0.0	6	4.4	4.9	8.7	8.7	6
P	CAPITAL QUARTERS	DC001	DC Housing Authority	90	4,787	N/a	55.9	N/a	30.4	N/a	4.8	N/a	6.2	N/a	8.7	11.4
P	MISSING	DC001	DC Housing Authority	76	1,744	10.5	45.7	88.2	31.9	0.0	17.3	1.3	3.1	N/a	12.1	13.1
P	JUDICIARY HOUSE	DC001	DC Housing Authority	260	1,412	1.4	80.1	93.9	10.3	3.3	5.8	0.9	2.2	N/a	21.1	5.4
P	Highland Dwellings II	DC001	DC Housing Authority	184	864	N/a	0.6	N/a	95.8	N/a	3	N/a	0.6	N/a	35.9	60.6
P	MISSING	DC001	DC Housing Authority	24	1,744	0.0	45.7	100.0	31.9	0.0	17.3	N/a	3.1	N/a	12.1	13.1
S8	CLAYPOOLE COURTS	N/a	N/a	122	2,970	3.3	38.7	93.3	31.3	3.3	22.2	N/a	5.9	56.7	13.6	17.2
S8	FAIRMONT I AND II APARTMENTS	N/a	N/a	205	2,970	22.9	38.7	68.3	31.3	4.9	22.2	2.9	5.9	38.1	13.6	17.2
S8	GLENN ARMS APTS	N/a	N/a	45	2,898	0.0	50.8	42.2	20.3	57.8	16.4	N/a	7	20.0	8.8	8.9
S8	WHEELER TERRACE APARTMENTS	N/a	N/a	112	926	2.8	1.6	97.3	91.9	0.0	4.8	N/a	0	57.8	33.4	34.3
S8	1330 7TH STREET APARTMENTS	N/a	N/a	134	1,701	0.0	44.1	95.5	24.9	3.0	16.4	1.5	8.9	48.5	13.9	14
S8	CONGRESS PARK I	N/a	N/a	162	1,543	0.0	1.4	100.0	95.1	0.0	3	N/a	0	51.9	43.4	36.7
S8	CONGRESS PARK II	N/a	N/a	214	1,543	0.0	1.4	99.5	95.1	0.5	3	N/a	0	67.3	43.4	36.7
S8	PARKCHESTER APARTMENTS	N/a	N/a	94	1,072	1.1	3.4	98.9	89.9	0.0	2.5	N/a	2.7	47.3	29.7	69

S8	CARMEL PLAZA NORTH	N/a	N/a	40	2,100	0.0	52.3	88.2	25.6	0.0	9.8	11.8	7.2	35.3	6.4	10.3
S8	GOLDEN RULE APARTMENTS	N/a	N/a	183	2,916	1.9	25.7	97.5	54.4	0.6	4.3	N/a	12.7	44.4	6.4	28.1
S8	DELTA TOWERS	N/a	N/a	149	2,015	10.2	25.6	87.6	68.7	2.2	2.7	N/a	1.8	N/a	17.7	19.7
S8	IVY CITY	N/a	N/a	60	1,031	1.7	21.6	98.3	57.9	0.0	14.6	N/a	2.2	60.0	28.3	39.5
S8	SAMUEL J. SIMMONS NCBA ESTATES	N/a	N/a	174	2,260	20.9	45.4	73.0	27.8	5.5	14.9	0.6	9	N/a	8.2	16.5
S8	CHRISTOPHER PRICE HOUSE AKA BELMONT	N/a	N/a	20	2,260	0.0	45.4	90.0	27.8	10.0	14.9	N/a	9	10.0	8.2	16.5
S8	WOODBERRY APARTMENTS	N/a	N/a	124	1,139	29.3	1.3	70.7	95.3	0.0	1.5	N/a	0	60.3	32.2	33.2
S8	TERRIFIC INN	N/a	N/a	14	3,165	0.0	64.5	92.3	19.8	0.0	5.3	N/a	6.9	N/a	8.9	6
S8	NORTHWEST CO-OP #15	N/a	N/a	48	1,530	10.3	41.6	89.7	39.8	0.0	8.9	N/a	5.7	37.9	9.5	10.1
S8	TYLER HOUSE	N/a	N/a	284	2,916	1.5	25.7	98.1	54.4	0.0	4.3	0.4	12.7	60.6	22.9	28.1
S8	STONERIDGE APTS. SEC II	N/a	N/a	46	2,443	0.0	0	100.0	92.2	0.0	6.6	N/a	0.6	60.5	41.5	31.5
S8	BENNING PARK APARTMENTS	N/a	N/a	193	1,783	0.0	1.1	100.0	96	0.0	1.6	N/a	0	64.9	31	29.7
S8	PARK ROAD APARTMENTS	N/a	N/a	150	2,269	4.1	28.2	46.0	23.6	36.5	36.6	13.5	5.7	N/a	24.3	22.6
S8	FRIENDSHIP TERRACE	N/a	N/a	40	2,835	57.5	78.6	35.0	3.7	5.0	6.2	2.5	6.3	N/a	38	2.9
S8	ASBURY DWELLING	N/a	N/a	146	1,352	6.5	54.9	90.6	29.4	2.9	9.7	N/a	2.2	N/a	14.3	8.1
S8	GIBSON PLAZA	N/a	N/a	122	1,902	2.4	40.5	66.1	42.7	5.7	8	25.8	7	33.1	11.7	16.9

S8	BROOKLAND MANOR AKA BRENTWOOD VILLA	N/a	N/a	373	2,206	0.9	8.7	96.4	79.7	2.4	7.2	N/a	2.2	40.4	23.6	29.3
S8	EDGEWOOD TERRACE I	N/a	N/a	114	1,459	0.9	10.1	96.5	78	2.7	9.8	N/a	0	51.3	30.3	21
S8	GREEN DOOR	N/a	N/a	10	1,902	18.2	40.5	81.8	42.7	0.0	8	N/a	7	N/a	11.7	16.9
S8	SECOND NORTHWEST ST COOPERATIVE NO. 17	N/a	N/a	46	1,902	6.9	40.5	89.7	42.7	0.0	8	3.5	7	44.8	11.7	16.9
S8	FRANKLIN COMMONS	N/a	N/a	100	1,343	3.2	17.6	94.7	66.6	2.1	9.6	N/a	0.3	42.1	17.4	14.8
S8	HUNTINGTON VILLAGE	N/a	N/a	202	1,637	8.8	0.2	91.2	90	0.0	5.5	N/a	1	68.9	44	27.2
S8	ROBERT L WALKER HOUSE	N/a	N/a	68	1,637	1.5	0.2	97.0	90	0.0	5.5	N/a	1	N/a	44	27.2
S8	MORTON & FLORENCE BAHR TOWERS	N/a	N/a	54	1,071	20.0	20.8	78.2	40.1	1.8	35.3	N/a	1.4	N/a	37.6	11.7
S8	ELSINORE COURTYARDS (DHAKA HOUSE)	N/a	N/a	12	1,350	N/a	1.1	N/a	95	N/a	0	N/a	0	N/a	27.9	31.9
S8	BENNING HEIGHTS	N/a	N/a	148	1,227	5.4	0.4	93.9	97.5	0.7	2	N/a	0	43.2	34.4	19.9
S8	FORT LINCOLN SENIOR VILLAGE II	N/a	N/a	176	2,227	0.6	8.4	97.7	79.3	1.7	8.2	N/a	1.2	N/a	21.3	12
S8	FAIRCLIFF PLAZA EAST	N/a	N/a	80	2,260	5.1	45.4	62.0	27.8	32.9	14.9	N/a	9	50.6	8.2	16.5
S8	MAYFAIR MANSIONS	N/a	N/a	320	1,937	1.4	2	96.6	89.5	1.0	5.9	0.3	0.3	48.0	27.2	37
S8	PARADISE AT PARKSIDE	N/a	N/a	261	1,937	0.4	2	97.4	89.5	1.7	5.9	0.4	0.3	46.4	27.2	37
S8	RITCH HOMES	N/a	N/a	42	4,409	4.8	64.6	90.5	12.7	4.8	13.5	N/a	5.8	40.5	34	5
S8	HUBBARD PLACE	N/a	N/a	230	1,829	3.9	29.6	94.0	33.9	1.3	29.6	0.9	3.8	31.9	18.7	22.7
S8	OAK	N/a	N/a	50	1,829	0.0	29.6	77.6	33.9	20.4		2.0	3.8	24.5	18.7	22.7

	STREET APARTMENTS															
S8	KING TOWERS	N/a	N/a	25	3,578	0.0	45.2	72.0	27.3	28.0	16.5	N/a	6.3	20.0	6.6	15
S8	FORT LINCOLN SENIOR VILLAGE III	N/a	N/a	304	2,227	2.4	8.4	96.6	79.3	0.7	8.2	0.3	1.2	N/a	21.3	12
S8	FORT LINCOLN SENIOR VILLAGE I	N/a	N/a	187	2,227	20.8	8.4	77.1	79.3	2.2	8.2	N/a	1.2	N/a	21.3	12
S8	ALLEN HOUSE	N/a	N/a	95	1,845	1.1	0.3	98.9	96.7	0.0	1.7	N/a	0.5	N/a	24.1	22.3
S8	FORT CHAPLIN PARK APARTMENTS	N/a	N/a	72	1,845	5.3	0.3	93.3	96.7	1.3	1.7	N/a	0.5	49.3	24.1	22.3
S8	ST. MARYS COURT	N/a	N/a	140	3,801	55.8	59.2	23.9	10.5	9.4	11.3	10.1	17	N/a	5.4	16.2
S8	WAH LUCK HOUSE	N/a	N/a	152	3,801	1.4	59.2	4.1	10.5	0.0	11.3	94.5	17	5.5	5.4	16.2
S8	TEL COURT COOPERATIVE	N/a	N/a	56	1,435	0.0	19.4	100.0	76.2	0.0	1.9	N/a	0.8	35.7	23.2	35.5
S8	WOODLEY HOUSE	N/a	N/a	6	1,616	5.6	47.9	88.9	38.1	0.0	10.9	N/a	0.7	N/a	14.6	4.5
S8	COLUMBIA HEIGHTS VILLAGE APTS	N/a	N/a	406	1,621	4.4	38.3	86.9	42.8	7.4	13.6	0.5	4.3	50.3	24.3	23.2
S8	TRINITY TOWERS	N/a	N/a	122	1,621	2.6	38.3	97.4	42.8	0.0	13.6	N/a	4.3	32.5	24.3	23.2
S8	KENYON APARTMENTS	N/a	N/a	18	1,621	0.0	38.3	64.7	42.8	35.3	13.6	N/a	4.3	29.4	24.3	23.2
S8	FOREST RIDGE-THE VISTAS	N/a	N/a	80	1,258	0.0	0.1	100.0	89.2	0.0	7.8	N/a	0	74.3	59.1	54.8
S8	FOREST RIDGE-THE VISTAS	N/a	N/a	301	1,258	1.5	0.1	97.4	89.2	0.8	7.8	N/a	0	75.4	59.1	54.8
S8	GARFIELD HILLS APTS	N/a	N/a	93	1,310	5.4	2.9	93.6	91.6	1.1	0.3	N/a	0	57.0	37.7	59.5
S8	THE COVINGTON FAMILY ASSOCIATION	N/a	N/a	21	2,033	0.0	80.6	38.5	4.5	61.5	6.4	N/a	8.5	7.7	9.4	4.8

	ON, I															
S8	ST JAMES MUTUAL HOME	N/a	N/a	36	2,640	25.0	58.3	70.8	26.9	0.0	10.6	4.2	1.4	12.5	4.5	6.3
S8	LANGSTON LANE	N/a	N/a	118	1,310	1.9	2.9	98.2	91.6	0.0	0.3	N/a	0	68.5	37.7	59.5
S8	EDGEWOOD TERRACE SECTION IV AKA THE	N/a	N/a	103	1,459	4.2	10.1	93.8	78	2.1	9.8	N/a	0	31.3	30.3	21
S8	PAUL LAURENCE DUNBAR APARTMENTS	N/a	N/a	170	2,476	15.6	62.6	83.1	16.4	1.3	13.7	N/a	4	N/a	8.5	4.8
S8	CAPITAL MANOR COOPERATIVE	N/a	N/a	19	2,476	N/a	62.6	N/a	16.4	N/a	13.7	N/a	4	N/a	8.5	4.8
S8	PORTNER FLATS	N/a	N/a	48	2,476	4.2	62.6	87.5	16.4	8.3	13.7	N/a	4	43.8	8.5	4.8
S8	STONERIDGE I	N/a	N/a	22	2,443	0.0	0	100.0	92.2	0.0	6.6	N/a	0.6	56.5	41.5	31.5
S8	THE GREEN VALLEY APTS	N/a	N/a	72	1,870	1.4	10.6	97.2	71.1	1.4	11.9	N/a	2.7	N/a	24.3	12.6
S8	ANCHOR HOUSING	N/a	N/a	9	1,279	N/a	40.8	N/a	44.4	N/a	5.1	N/a	5.1	N/a	23.9	10.9
S8	CHHI HOUSE (OTIS HOUSE)	N/a	N/a	6	1,279	N/a	40.8	N/a	44.4	N/a	5.1	N/a	5.1	N/a	23.9	10.9
S8	HEDIN HOUSE	N/a	N/a	35	1,832	3.0	16.2	93.9	75.3	3.0	2.9	N/a	1.7	N/a	31.1	8.7
S8	ATLANTIC TERRACE	N/a	N/a	196	1,274	0.0	0.1	100.0	86.2	0.0	3.7	N/a	0	62.9	39.2	29.5
S8	FAIRCLIFF PLAZA WEST	N/a	N/a	111	2,970	0.9	38.7	52.3	31.3	46.8	22.2	N/a	5.9	40.4	13.6	17.2
S8	BEECHER COOPERATIVE	N/a	N/a	18	2,508	N/a	73.2	N/a	8.5	N/a	7.9	N/a	8	N/a	28	18.5
S8	FREDERICK DOUGLASS	N/a	N/a	150	1,387	0.7	0.4	98.0	98.4	0.7	0.5	N/a	0	45.0	30.9	54.4
S8	MORRIS ROAD	N/a	N/a	30	1,042	0.0	9.2	100.0	86.3	0.0	4.1	N/a	0	83.3	30.9	41.3

S8	CARVER HALL APTS.	N/a	N/a	95	1,540	0.0	2.2	100.0	94.2	0.0	2.2	N/a	0.6	53.1	36.4	19.9
S8	GALEN TERRACE	N/a	N/a	84	1,387	0.0	0.4	100.0	98.4	0.0	0.5	N/a	0	63.2	31.6	54.4
S8	W STREET APARTMENTS	N/a	N/a	18	1,387	58.8	0.4	35.3	98.4	5.9	0.5	N/a	0	47.1	31.6	54.4
S8	FOSTER HOUSE	N/a	N/a	76	1,744	8.1	45.7	89.2	31.9	0.0	17.3	2.7	3.1	10.8	12.1	13.1
S8	LINCOLN WESTMORELAND I	N/a	N/a	82	1,744	2.8	45.7	93.1	31.9	2.8	17.3	1.4	3.1	41.7	12.1	13.1
S8	ATLANTIC GARDENS	N/a	N/a	108	1,274	0.0	0.1	100.0	86.2	0.0	3.7	N/a	0	74.7	39.2	29.5
S8	SOUTHERN HILLS APTS	N/a	N/a	255	1,274	0.0	0.1	98.8	86.2	0.8	3.7	N/a	0	49.2	39.2	29.5
S8	AZEEZE BATES	N/a	N/a	18	1,878	0.0	20.8	100.0	69	0.0	5.7	N/a	0.7	66.7	27.5	28.1
S8	BENNING COURTS	N/a	N/a	97	1,878	0.0	20.8	99.0	69	1.0	5.7	N/a	0.7	62.5	27.5	28.1
S8	THE PENTACLE	N/a	N/a	50	1,878	0.0	20.8	100.0	69	0.0	5.7	N/a	5.7	55.3	27.5	28.1
S8	CAPITOL HILL TOWERS	N/a	N/a	204	1,902	3.0	40.5	93.9	42.4	2.0	8	0.5	3.1	0.5	9.5	16.9
OM	DUPONT PARK ADVENTIST APARTMENTS	N/a	N/a	44	1,309	0.0	1.7	100.0	95	0.0	3	N/a	0	N/a	33.4	30.1
OM	OTTO B. BERG	N/a	N/a	25	1,637	9.1	0.2	90.9	90	0.0	5.5	N/a	1	9.1	44.1	27.2
OM	KENNEDY INSTITUTE	N/a	N/a	15	2,835	N/a	78.6	N/a	3.7	N/a	6.2	N/a	6.3	N/a	38	2.9
OM	COLONY HOUSE APARTMENTS	N/a	N/a	57	1,143	5.2	26.9	89.7	48.7	5.2	16.8	N/a	3	N/a	23.1	5.1
OM	CAPITOL COMMONS	N/a	N/a	40	1,071	2.5	20.8	95.0	40.1	2.5	35.3	N/a	1.4	N/a	37.6	11.7
OM	UPSHUR HOUSE	N/a	N/a	44	1,071	11.9	20.8	88.1	40.1	0.0	35.3	N/a	1.4	N/a	37.6	11.7
OM	54TH STREET CORPORATION	N/a	N/a	8	2,260	N/a	45.4	N/a	27.8	N/a	14.9	N/a	9	N/a	8.2	16.5
OM	SUNFLOWER HOUSE	N/a	N/a	20	1,829	20.0	29.6	25.0	33.9	45.0	29.6	10.0	3.8	15.0	18.7	22.7

OM	VICTORY HEIGHTS, INC.	N/a	N/a	75	1,621	10.5	38.3	69.7	42.8	18.4	13.6	1.3	4.3	N/a	24.3	23.2
OM	EDGEWOOD TERRACE III	N/a	N/a	73	1,459	4.3	10.1	91.4	78	1.4	9.8	2.9	0	N/a	30.3	21
OM	HEARTH FOUNDATION	N/a	N/a	13	1,100	N/a	50.5	N/a	31.4	N/a	7	N/a	5.5	N/a	22	9.8
OM	RILEY-CHEEKS HOUSE, INC.	N/a	N/a	13	638	N/a	29	N/a	53.3	N/a	16.2	N/a	0.4	N/a	23.5	17.2
OM	MERIGOLD PLACE, INC.	N/a	N/a	7	1,829	N/a	29.6	N/a	33.9	N/a	29.6	N/a	3.8	N/a	18.7	22.7
OM	NORTH CAPITAL AT PLYMOUTH	N/a	N/a	68	1,799	5.8	7.3	92.8	76.1	0.0	10.8	1.5	1.3	N/a	17.3	13.1

Note: Housing types are P = public housing, S8 = project-based Section 8, and OM = other multifamily assisted housing.

District of Columbia

In the District, the residents of publicly supported housing developments that serve a large percentage of families with children, elderly persons, and persons with disabilities tend to be much more heavily Black than the populations of the census tracts in which they are located. However, there are project-based Section 8 developments that have smaller Black populations and larger White populations compared to the census tracts in which the developments are located. Developments that serve a large percentage of elderly residents tend to have larger Black populations than the census tracts in which they are located.

3. Disparities in Access to Opportunity

3.a. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and the region, including within different program categories (public housing, project-based Section 8, other multifamily assisted developments, HCVs, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

District of Columbia

In the District, public housing residents and HCV users have lower access to proficient schools. HCV users and public housing residents also have lower engagement in the labor market. In the District, access to transportation costs is high across all types of publicly supported housing. Conversely, access to environmentally healthy neighborhoods is also low across all types of publicly supported housing.

Region

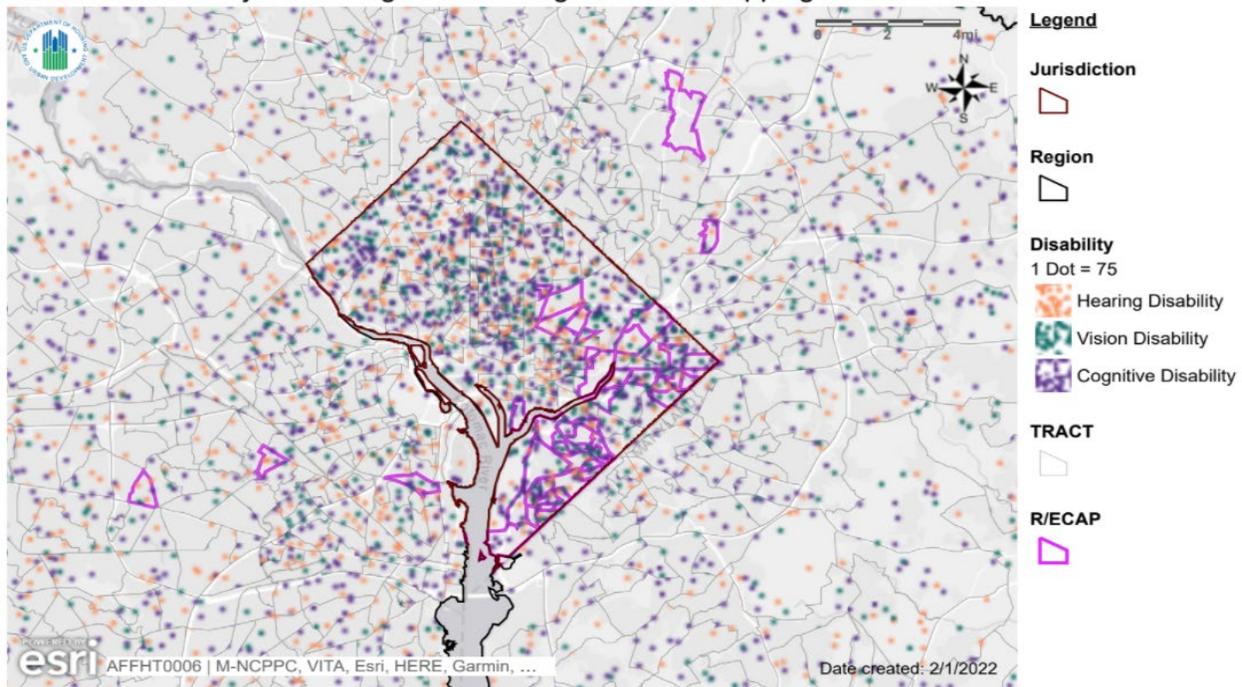
Regionally, public housing residents and HCV users tend to live in areas with low access to proficient schools, low labor market engagement, and low access to environmentally healthy neighborhoods. Proximity to transit centers is less consistent across areas with higher proportions of public housing residents and HCV users.

D. Disability and Access Analysis

In 1988, Congress extended the Fair Housing Act's protections against housing discrimination to persons with disabilities. In addition to protection against intentional discrimination and unjustified policies that have disproportionate effects, the Fair Housing Act includes three provisions that are unique to persons with disabilities. First, it prohibits the denial of reasonable accommodation requests for persons with disabilities if the accommodations are necessary to afford an individual equal opportunity to use and enjoy a dwelling. Reasonable accommodations are departures from facially neutral policies and are generally available, so long as granting the accommodation request would not place an undue burden on the party providing the accommodation or result in a direct threat to the health or safety of others. Permitting an individual with an anxiety disorder to have a dog in their rental unit as an emotional support animal despite a broad "no pets" policy is an example of a reasonable accommodation. Second, it prohibits the denial of reasonable modification requests. Modifications involve physical alterations to a unit, such as the construction of a ramp or the widening of a door frame, and must be paid for by the person requesting the accommodation unless the unit receives federal financial assistance and is subject to Section 504 of the Rehabilitation Act. Third, it includes a design and construction provision that requires most multifamily housing constructed since 1991 to have certain accessibility features. This section of the Fair Housing Analysis looks at the housing barriers faced by persons with disabilities, including those that result in the segregation of persons with disabilities in institutions and other congregate settings.

1. Population Profile

Map 80: Disability by Type (Hearing, Vision, Cognitive), District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

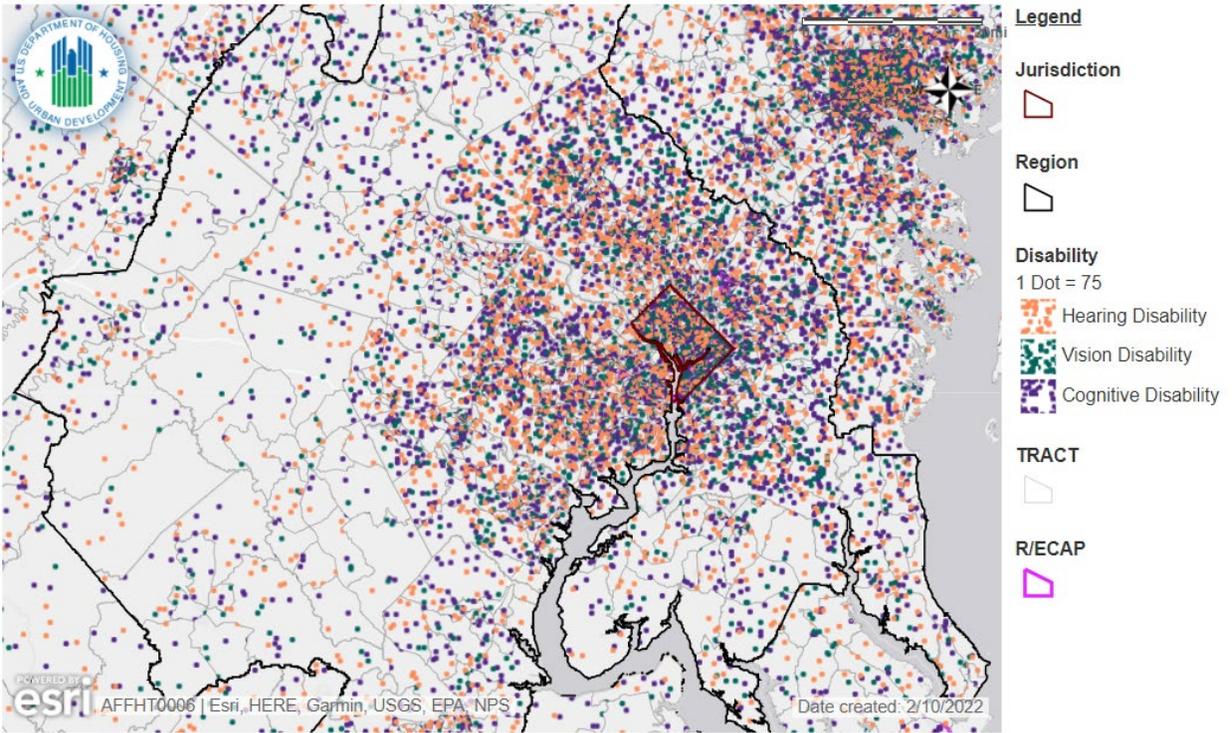
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 81: Disability by Type (Hearing, Vision, Cognitive), Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

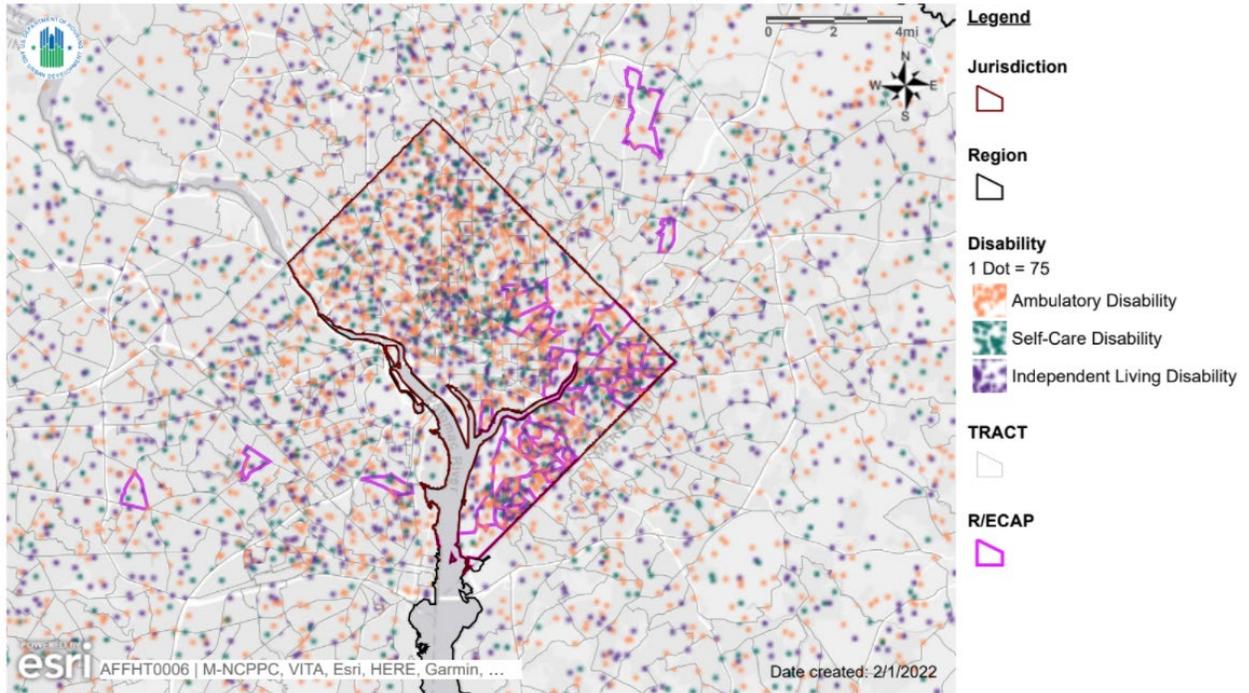
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

**Map 82: Disability by Type (Ambulatory, Self-Care, Independent Living), District of Columbia
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool**



Name: Map 14 - Disability by Type

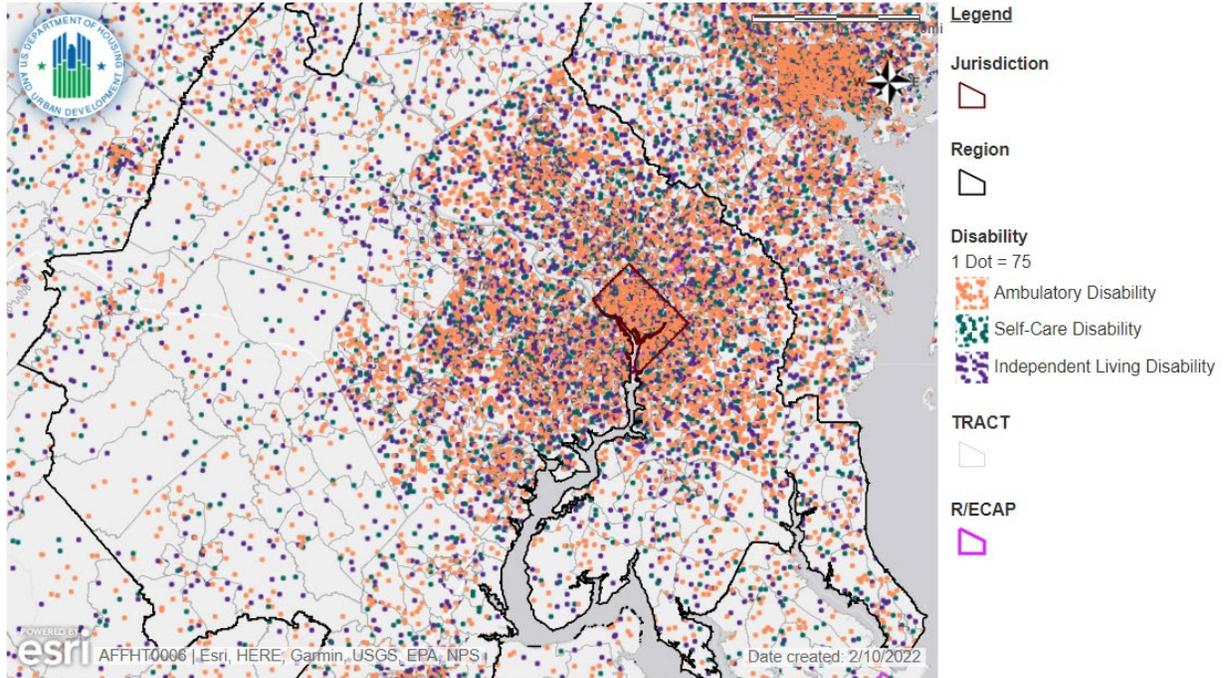
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 83: Disability by Type (Ambulatory, Self-Care, Independent Living), Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

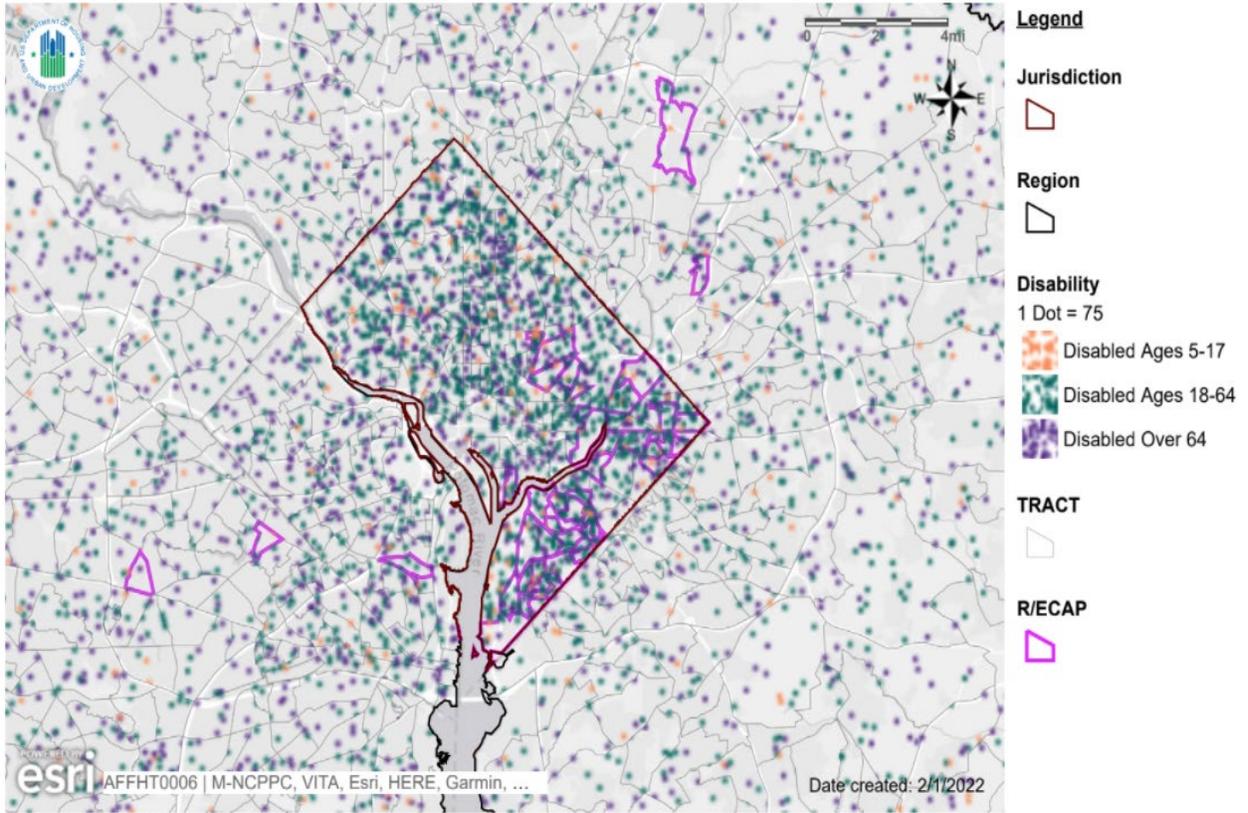
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 84: Disability by Age, District of Columbia
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

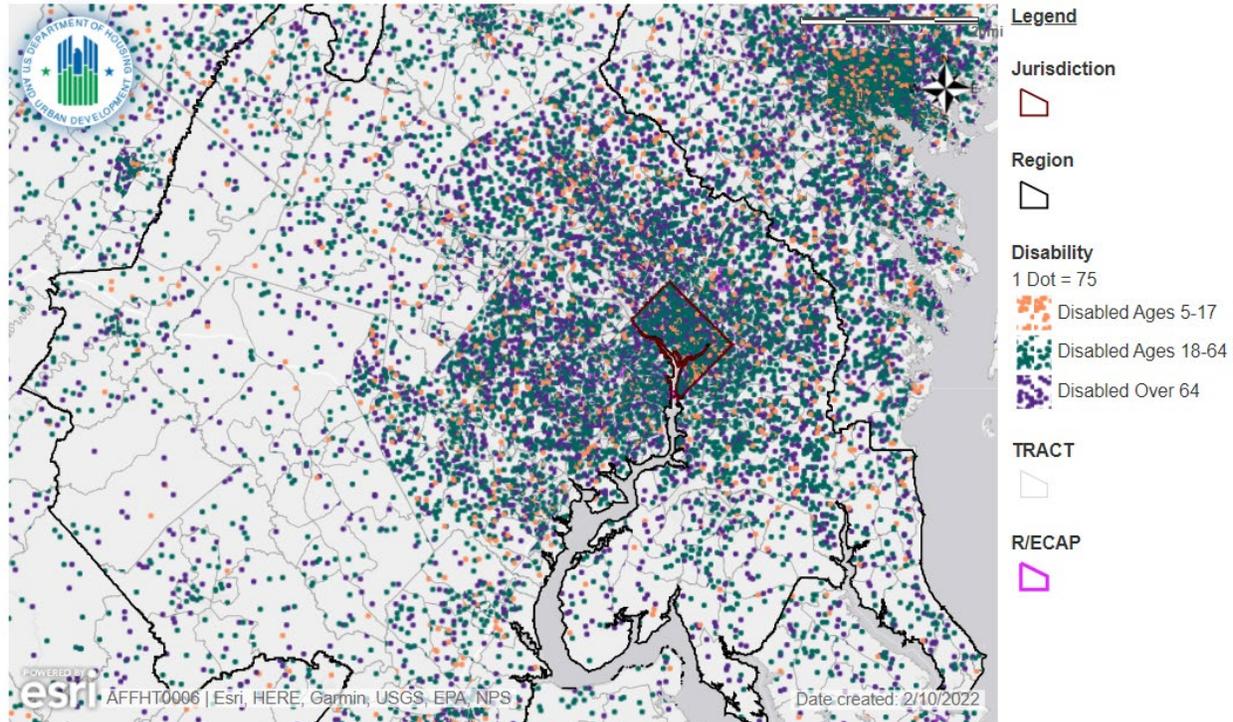
Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Map 85: Disability by Age, Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: District Of Columbia (CDBG)

Region: Washington-Arlington-Alexandria, DC-VA-MD-WV

HUD-Provided Data Version: AFFHT0006

Table 35: Disability by Type

Jurisdiction	Disability status	Hearing difficulty	Vision difficulty	Cognitive difficulty	Ambulatory difficulty	Self-care difficulty	Independent living difficulty
District of Columbia	12%	3%	4%	4%	6.1%	2%	4.8%
Region	8.7%	2.2%	1.6%	3.4%	4.5%	1.8%	3.9%

Note: All disability characteristics are based on the civilian noninstitutionalized population.
Data source: 2015–2019 American Community Survey five-year estimates

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

District of Columbia

Persons with disabilities in D.C. are located primarily in the southeast and northeast quadrants of the District and, in particular, in the areas east of the Anacostia River that are within wards 7 and 8 and where the population is almost entirely Black. There are three notable exceptions to this trend; in addition to these areas' being majority Black (though not by as wide a margin), each has local conditions that explain the large populations of persons with disabilities. One is an area including Gallaudet University that is home to students of that school who have hearing disabilities. Another is the area including the Central Detention Facility and the Central Correctional Facility. The last—which includes a portion of Northeast D.C. in the vicinity of Fort Totten—is home to the North Capitol at

Plymouth, a subsidized senior housing development. Most of the areas with high proportions of persons with disabilities in D.C. are also R/ECAPs.

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

District of Columbia

Patterns of high populations of persons with disabilities, by type of disability, generally mirror overall patterns of disproportionate populations of persons with disabilities in D.C., albeit with one exception. Persons with hearing disabilities are more represented in ward 5, especially in Trinidad, Ivy City, and Carver/Langston (including but not limited to the Gallaudet campus), and there are large numbers of persons with hearing disabilities at the Armed Forces Retirement Home and in Cleveland Park in ward 3, the most heavily White part of D.C. High proportions of persons with disabilities, by age, vary more significantly. Older adults with disabilities are located primarily in wards 7 and 8 but are concentrated in the predominantly White ward 3 as well. Younger adults with disabilities are more represented in ward 5, while children with disabilities are more represented in ward 1, historically the most integrated ward though also one that has been significantly changed by patterns of gentrification and displacement.

iii. Housing Accessibility

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

As the data show, between 2.5 percent and 6.1 percent of individuals have ambulatory disabilities, depending on the jurisdiction. Similarly, 2–3 percent of individuals and 2–4 percent of individuals, respectively, have hearing or vision disabilities. Given the large size of the region, this implies a likely estimated total need for between 100,000 and 300,000 accessible housing units. Given the low income levels of persons with disabilities, it is critical that a significant share of these units be affordable for them to be truly useful.

Accessibility Requirement for Federally Funded Housing

HUD's implementation of Section 504 of the Rehabilitation Act of 1973 (24 CFR Part 8) requires that publicly supported federal housing developments make (1) 5 percent of total units accessible to individuals with mobility disabilities and (2) an additional 2 percent of total units accessible to individuals with sensory disabilities. It requires that each property, including site and common areas, meet the Uniform Federal Accessibility Standards (UFAS) or HUD's alternative accessibility standard. Public housing and project-based Section 8 units are both considered to be publicly supported housing. The Publicly Supported Housing Analysis section (see page XX) describes, jurisdiction by jurisdiction, the number of units that exist through the public housing and project-based Section 8 programs, as well as programs like Section 202 and Section 811 that fall under the umbrella of other multifamily housing. Collectively, these units account for a significant share of units subject to Section 504, though that law's accessibility requirements apply to HUD programs like HOME and CDBGs as well. Unfortunately, housing through the programs discussed in the Publicly Supported Housing Analysis section account for tens rather than hundreds of thousands of units, and, as described above, the accessibility requirements that apply to those units only require that 5 percent of units be accessibility to persons with mobility disabilities and 2 percent to individuals with sensory disabilities. As publicly supported housing is generally concentrated in the District and is least present in outer suburban communities like Loudoun and Prince William Counties, the distribution of accessible units may follow that pattern to an extent. However, as discussed below, a portion of older public housing

units in the District may require retrofits in order to be fully accessible, thus slightly undermining that conclusion.

Low-Income Housing Tax Credit Units

There is legal ambiguity regarding whether LIHTC units are subject to Section 504, but the program contributes an important supply of affordable, accessible housing regardless. That is primarily because the Fair Housing Act's design and construction requirements, which took effect in 1991, have been in place for the vast majority of the life of the LIHTC program. There are tens of thousands of LIHTC units across the jurisdictions, including 23,631 low-income LIHTC units in the District. It is likely that a somewhat higher number of LIHTC units meet some kind of accessibility standard than do other types of publicly supported housing units, but the accessibility standard that those LIHTC units do meet is a lesser one.

Fair Housing Act Units

In the region, there are 156,637 units in structures with five or more units that have been built from 2000 to the present and a further 176,137 units in structures with five or more units that were built from 1980 through 1999. It is not possible to determine what portion of that latter number was constructed between the date in 1991 when the Fair Housing Act's design and construction standards took effect and the close of 1999. This may appear to be a significant number of potentially accessible units, but it is important to keep a few factors in mind. First, the data above include publicly supported housing units, particularly LIHTC units, built in the relevant timeframe. Thus, totals from this subsection cannot be added to figures from the preceding subsections. Second, many households that do not include individuals with disabilities who have accessibility needs reside in this housing, too. Indeed, from the standpoint of community integration, it would not be a desirable outcome for people who do not have disabilities to vacate this housing en masse in order for it to be made available to persons with disabilities. Third, compliance with the Fair Housing Act's accessibility requirements can be uneven at times. These ACS data do not provide a basis for concluding that the developers of this housing followed the law.

Summary

Overall, there appear to be significant unmet needs for affordable, accessible housing in the region. It is likely that these are most acutely felt in outer suburban communities like Loudoun and Prince William Counties that lack both multifamily housing, in general, and publicly supported housing, in particular, in comparison with the jurisdictions at the core of the region. It is also likely that funding for accessibility retrofits will be essential to ensuring that older sources of publicly supported housing, like D.C.'s large public housing stock, are accessible to persons with disabilities. Lastly, inclusionary zoning, as practiced in the District, Fairfax County, and Montgomery County, has begun to create better balance in the location of affordable, accessible housing regionally.

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

The Publicly Supported Housing Analysis section (see page XX) contains a granular discussion of the location of affordable housing in each jurisdiction and in the region. There is no basis for concluding that there are significant differences between where affordable housing is located and where affordable, accessible housing is located. There may, however, be some minor nuances. For instance, the affordable housing that is least likely to be accessible consists of older developments, principally public housing, that were developed prior to the passage of accessibility laws. By a wide margin, the District is home to the largest share of such housing. Thus, while the District still likely has more affordable, accessible housing than any jurisdiction, it is also likely that a meaningful amount of D.C.'s public housing is not accessible. At the same time, because public housing is subject to Section 504,

public housing residents may be entitled to have the D.C. Housing Authority pay for accessibility retrofits as reasonable modifications. The other important nuance is in regard to affordable but not publicly supported housing produced through inclusionary zoning programs. The District, Fairfax County, and Montgomery County all have robust inclusionary zoning programs that result in the development of affordable units, most frequently in large new multifamily developments. The locations of where such developments occur is often quite different from the distribution of affordable, accessible housing that exists through publicly supported housing programs. In Fairfax County, the most significant areas of growth through inclusionary requirements are in the Silver Line corridor in western Fairfax County. In D.C., areas of growth include The Wharf, Navy Yard, NoMa, Shaw, Columbia Heights, and Petworth. In Montgomery County, Bethesda and Rockville are areas of significant inclusionary development.

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

Table 36: Disability by Publicly Supported Housing Program Category

	Persons with a Disability	
District of Columbia	#	%
Public Housing	1,864	31.52%
Project-Based Section 8	1,025	11.14%
Other Multifamily	82	15.98%
HCV Program	2,993	24.75%

District of Columbia

In D.C., persons with disabilities are underrepresented in project-based Section 8 housing and, to a lesser extent, other multifamily assisted housing in relation to their share of the income-eligible population, but they appear to have relatively equal opportunity to live in public housing or to obtain HCVs.

3. Integration of People with Disabilities Living in Institutions and Other Segregated Settings

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

Up until a wave of policy reforms and court decisions in the 1960s and 1970s, governments at all levels, including in Virginia, Maryland, and the District of Columbia, primarily housed persons with intellectual and developmental disabilities and individuals with psychiatric disabilities in large state-run institutions. Within these institutions, persons with disabilities have had few opportunities for meaningful interaction with individuals without disabilities, limited access to education and employment, and a lack of individual autonomy. The transition away from housing persons with disabilities in institutional settings and toward providing housing and services in home and community-based settings accelerated with the passage of the Americans with Disabilities Act (ADA) in 1991 and the U.S. Supreme Court’s landmark decision in *Olmstead v. L. C.* in 1999. In *Olmstead*, the Supreme Court held that, under the regulations of the U.S. Department of Justice implementing Title II of the ADA, if a state or local government provides supportive services to persons with disabilities, it must do

so in the most integrated setting appropriate to the needs of a person with a disability and consistent with their informed choice. This obligation is not absolute and is subject to the ADA defense that providing services in a more integrated setting would constitute a fundamental alteration of the state or local government's programs.

The transition from widespread institutionalization to community integration has not always been linear, and concepts about what comprises a home and community-based setting have evolved over time. Although it is clear that developmental centers and state hospitals are segregated settings and that an individual's own house or apartment in a development where the vast majority of residents are individuals without disabilities is an integrated setting, significant ambiguities remain. Nursing homes and intermediate care facilities are clearly segregated, though not to the same degree as state institutions. Group homes fall somewhere between truly integrated supported housing and segregated settings, and the degree of integration present in group homes often corresponds to their size.

The following section includes detailed information about the degree to which persons with intellectual and developmental disabilities and individuals with psychiatric disabilities reside in integrated or segregated settings. The selection of these two areas of focus does not mean that persons with other types of disabilities are never subject to segregation. The discussion below includes some jurisdiction-level analysis but is primarily organized by state. State governments are primarily responsible for implementation of the *Olmstead* mandate, and, as a result, there are often significant commonalities across jurisdictions within the same states.

District of Columbia

The District has closed all of its publicly run segregated settings for individuals with intellectual and developmental disabilities, including the Forest Haven Children's Developmental Center in 1991 as well as the DC Village Nursing Home and the portion of St. Elizabeth's Hospital housing persons with intellectual and developmental disabilities, the latter two in 1994. There are no public or private facilities for persons with intellectual and developmental disabilities that house more than 15 adults. At the same time, the absence of large segregated settings does not imply the presence of integrated settings, and 15 is an inappropriately high cutoff point for determining whether a private facility is segregated. The heart of the problem of inadequate integrated housing for persons with intellectual and developmental disabilities is that there is an extreme shortage of affordable housing generally. This makes it difficult for individuals with tenant-based rental assistance to find units that are affordable to them, sometimes causing individuals with disabilities to use their assistance to rent in Prince George's County, Maryland. Accordingly, it is not surprising that the D.C. Rehabilitation Services Administration's partner survey indicated that just 45.8 percent of respondents said that housing was readily available to persons with disabilities. Although the Census Bureau does not disaggregate these data by type of disability, the 2015–2019 American Community Survey shows that the 39,119 residents of group quarters in the District were almost twice as likely—22.8 percent compared to 12.1 percent—to have disabilities as individuals not living in group quarters. Residents of institutionalized group quarters—57.1 percent—were especially likely to have disabilities. Both in the District and in Maryland, a significantly higher percentage of residents live in nursing homes than in Virginia.

With respect to persons with psychiatric disabilities, circumstances are broadly similar. On one hand, the District has gradually reduced the number of persons with disabilities institutionalized at St. Elizabeth's Hospital, and the District has supported efforts by Pathways to Housing DC to connect individuals with psychiatric disabilities to integrated housing in accordance with a Housing First model. On the other hand, the level of support for permanent supportive housing and set-aside vouchers is not sufficient to ensure community integration. In the absence of efforts like those of Pathways to Housing DC being taken to scale, many individuals with psychiatric disabilities end up homeless, incarcerated, in psychiatric wards at local hospitals, or in nursing homes. Advocates have challenged

this systemic breakdown with respect to the children’s mental health system in the lawsuit *M.J. v. District of Columbia*, a putative class action that is pending in federal court.

The District currently has 99 community residential facilities for persons with psychiatric disabilities, which have a combined capacity of 666 beds. These facilities are not as segregated as institutions like hospitals and nursing homes but not as integrated as permanent supportive housing. The average capacity, at nearly 7 beds, is large. Often, group homes with 4 or fewer beds are considered small, and those with 5 or more are considered large. One challenge with the majority of these group homes—and with not having group homes in areas with multifamily housing in addition to areas with single-family homes—is that they are not accessible to persons with physical disabilities. Many residents of the District have co-occurring physical and psychiatric disabilities.

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

Supportive Services

Across jurisdictions, supportive services are provided through similar Medicaid-funded programs, including variations on HCBS waivers. These programs, at their best, enable individuals with disabilities, including those with the most intensive services and supports needs, to live in integrated, community-based settings. The exact names of available waivers, the processes for applying, the length of wait (if any) to start receiving waiver services, and what services are covered under the waiver (and at what billing rates) vary from jurisdiction to jurisdiction.

In D.C., for individuals with developmental disabilities, the Home and Community-Based Services Waiver provides among the most well-funded services to aid people living in integrated settings of any jurisdiction in the country. In addition, unlike the vast majority of states, the District has no waiting list for Home and Community-Based Services Waiver services. Those who are eligible are able to receive services. The Elderly and Persons with Physical Disabilities Waiver is the third key program for providing community-based supportive services in a manner that prevents unjustified institutionalization. Intensive home and community-based services and supports are available to persons with disabilities in the District through multiple Medicaid-funded programs. Medicaid State Plan services are available for individuals with psychiatric disabilities. On June 3, 2019, the D.C. Department of Health Care Finance submitted an application to the federal Center for Medicare and Medicaid Services for its Section 1115 Medicaid Behavioral Health Transformation Demonstration Program, which was approved on November 6, 2019. Among other changes, the demonstration would expand crisis stabilization and mobile outreach services, provide comprehensive recovery support services including peer supports, add coverage for psychologists and licensed clinical social workers, and provide expanded supported employment services.

Permanent Supportive Housing

The provision of permanent supportive housing across jurisdictions in the region is far more disparate. Through its Department of Human Services, the District of Columbia provides locally funded tenant-based rental assistance on a large scale as its primary means of creating integrated housing opportunities. The assistance can be accessed through the Coordinated Assessment and Housing Placement system. One limitation of this program is that payment standards for rental assistance are lower than those of the District of Columbia Housing Authority. As a result, persons with disabilities may have limited choice of neighborhoods and sometimes resort to housing that is outside of D.C. entirely. Montgomery County, Maryland, serves over 1,500 individuals annually through its permanent supportive housing, with at least 90 percent retaining permanent housing on an annual basis. In Virginia, multiple local governments support nonprofits like NewHope Housing, PathForward, and the Good Shepherd Housing Foundation that provide supportive housing through a number of different

approaches, including site-based permanent supportive housing development and master leasing of units in existing apartment complexes. Tenant-based rental assistance for persons with disabilities is much less available in Virginia than it is in the District and permanent supportive housing programs are much more established and operate at a larger scale in Alexandria, Arlington County, and Fairfax County than they do in Loudoun and Prince William Counties. There is a clear need for the capacity of these outer suburban counties to provide permanent supportive housing to keep pace with their more rapid population growth.

4. Disparities in Access to Opportunity

4.a. To what extent are people with disabilities able to access—and what major barriers do they face in accessing—the following services, accommodations, and opportunities in the jurisdiction and the region?

i. Government Services and Facilities

Although a variety of public facilities and services have reasonable accommodation policies for persons with disabilities, many facilities and services require additional outreach or efforts by the person with a disability to request accommodations themselves, usually with several days' notice, rather than having these services consistently embedded into their administration. As a result, individuals with disabilities must be proactive to obtain necessary accommodations.

In the region, some counties provide a range of accessibility services. Montgomery County has an ADA Compliance Team and provides training and technical assistance for county staff on ADA compliance and other disability needs. Similarly, Fairfax County provides ADA services through its government offices, including enforcing building codes that require ADA compliance and handling ADA complaints. In the District of Columbia, any facility or part of a facility that is constructed by a state or local government entity after January 26, 1992 must be built in strict compliance with the ADA. The District is not necessarily required to make every pre-ADA facility fully compliant with current accessibility codes, however, all District services, programs, or activities must be accessible to and usable by persons with disabilities when viewed in their entirety. This is called “overall program access.”¹⁸ Nonetheless, this loophole means accessibility problems may remain where persons with disabilities face greater barriers in accessing government facilities or services. The same principles apply to other governments in the region.

Web accessibility reveals similar dualities, where governments have attempted to comply with Section 508 referring to website accessibility standards. However, this compliance is only implemented “whenever possible,” and certain elements remain poorly accessible.

ii. Public Infrastructure

Although accommodations are available in a range of public and private infrastructure (e.g., sidewalks, pedestrian crossings, and pedestrian signals), lack of compliance or maintenance results in inequitable treatment for persons with disabilities. Inadequate maintenance of sidewalks can impede accessibility for persons with mobility-related disabilities, including persons who require wheelchairs for transportation. Recent public efforts, such as the crowdsourced Project Sidewalk, endeavor to map sidewalk accessibility by noting curb ramp conditions, lack of sidewalks, and other common issues impeding mobility in the District. Many sidewalks in the District metropolitan area are not up to ADA standards; in many cases, this is because construction projects have left large cracks that serve as impediments to persons in wheelchairs. The governments of the District of Columbia, Virginia, and Maryland have all put out ADA Transition Plans for Public Rights-of-Way, which provide a detailed review of sidewalks, crosswalks, bus stops, curb ramps, and accessible pedestrian signals. However, the Transition Plans for D.C., published in 2016, and Maryland, published in 2009, have not been

updated in quite some time, and inaccessible infrastructure problems persist. Additionally, since COVID-19 has caused restaurants to use more public space for outdoor dining, the pandemic has created new accessibility challenges. Moreover, parking of electric scooters and bicycles has also resulted in impassable sidewalks, particularly in downtown D.C.

iii. Transportation

In Virginia, the elderly population is predicted to increase to 20 percent of residents by 2030,¹⁹ the largest population increase of any demographic. The state recognizes that as the elderly population increases, the demand for public transportation will increase as well, but as it admits in its 2018 *Assessment of Disability Services in Virginia* study, there is insufficient transportation of this type to accommodate rising demand.²⁰ The outpaced demand for transportation also disproportionately impacts individuals with disabilities, who also tend to rely on public transportation to travel. Similarly, although Maryland has more extensive public transportation modes for individuals with disabilities, less extensive infrastructure in suburban areas reduces access for individuals with disabilities.

Bus and Rail

The Washington Metropolitan Area Transit Authority (WMATA) serves the entire region and explicitly outlines on its website the measures taken to enhance access to its rail and bus systems for persons with disabilities. Fare vending machines have accessibility features, including instructions in Braille with raised alphabets and a button for audio instructions. All stations have at least one extra-wide fare gate for wheelchair access, and all stations except Arlington Cemetery use bumpy tiles to alert customers with low vision that they are nearing the edge of a platform. Railcars also provide priority seating for persons with disabilities and gap reducers have been installed on all railcars to make it easier for an individual with a mobility support to enter and exit the car safely. For Metrobus, all buses are wheelchair accessible and have both audio and visual stop announcements. If the automated announcement system fails to work, bus operators are supposed to announce major intersections, landmarks, and transfer points. There are a variety of other measures in place as well.²¹

One notable concern with the WMATA Metrorail system is the operating quality of elevators. They are deteriorating and result in patrons being trapped in the elevator.²² Also, at stations with multiple entrances, signage directing people to elevators can often be scarce, making it difficult to locate them.²³ Because elevators are a primary access point to the Metro station for individuals with disabilities, these dysfunctional elevator features are likely to disproportionately limit transportation access for transit riders with disabilities. This trend may change due to an influx of federal dollars allocated to target elevator repairs.

Virginia Railway Express,²⁴ the Maryland Transit Administration,²⁵ the D.C. Circulator,²⁶ ART buses,²⁷ and Montgomery County Ride On buses use similar measures to Metrorail and Metrobus.²⁸ Prince William County's OmniRide,²⁹ Loudoun County Local Bus Service,³⁰ and the Fairfax County Connector³¹ and CUE buses are wheelchair accessible; however, their website does not specify if bus operators are instructed to announce major intersections, landmarks, and transfer points.³² The Alexandria DASH bus system is wheelchair accessible, provides bus service within the city, and connects with Metrobus, Metrorail, Virginia Railway Express, and other local bus systems. However, the DASH bus system website does not elaborate on what, if any, other measures are taken to make the system accessible to persons with disabilities.³³ The fare is typically \$2 but individuals with disabilities may ride for free if they have a valid MetroAccess or Alexandria DOT paratransit card.³⁴

Paratransit

WMATA also runs MetroAccess, a door-to-door paratransit program throughout the entire region. Some MetroAccess customers are entitled to free rides on Metrorail and Metrobus. However, MetroAccess unfortunately does not provide same-day trip service. Fares can also be expensive and cost a

maximum of \$6.50 per trip.³⁵ WMATA also offers an even more costly service called Abilities Ride. Although this service has been suspended because of COVID-19, Abilities Ride allows individuals who are eligible for MetroAccess to receive same-day transportation services through a local taxi company provided the trip begins or ends in Maryland. The individual pays for the first \$5 of the trip, WMATA pays for the next \$15, and then the rider is responsible for paying any amount over \$20.³⁶ The City of Rockville offers a similar program that provides low-income residents over the age of 60 a subsidy of \$34 a month for taxicab services.³⁷

The Alexandria DOT offers a paratransit program similar to MetroAccess seven days a week for residents of Alexandria who are unable to use public transportation. Similar to MetroAccess, trips must be scheduled a minimum of one day in advance. Trips inside the city and within five miles of the city cost \$4 each way, and trips to areas more than five miles outside the city cost \$6 each way. Availability of the paratransit program may also be limited to high-priority trips, depending on the status of the COVID-19 pandemic.³⁸ Arlington County,³⁹ Loudoun County,⁴⁰ and MDOT⁴¹ also offer similar paratransit programs that do not take same-day reservations.

iv. Proficient Schools and Educational Programs

District of Columbia

Students with disabilities comprise nearly 20 percent of all students in the District. The Office of the State Superintendent of Education has implemented a variety of initiatives to attempt to increase access for these students to proficient schools, but significant barriers remain. Nearly 25 percent of the 3,253 students with disabilities who are transported by the Office of the State Superintendent of Education to school spend two hours or more each day on the bus to school.⁴²

Accessibility in schools is evaluated using the Individuals with Disabilities Education Act, which requires all states and D.C. to annually assess accessibility standards in public schools. In the District's latest report, from 2019, the percentage of children with Individualized Education Programs (IEPs) who spent 80 percent or more of the school day inside the regular classroom (57 percent) fell well short of the target (64 percent).⁴³ This discrepancy begins in preschool education and continues through high school. Moreover, out of 1,770 students with disabilities, more than 66 percent exited special education by dropping out of the school system.⁴⁴

Although there appears to be no overrepresentation of particular racial/ethnic groups or particular disabilities among D.C.'s population of students with disabilities, the identification of the students and the implementation of IEPs continues to be inadequate. Only 86 percent of children whose parents had consented to IEP evaluations received them within 60 days.⁴⁵ Though IEP development for early childhood is close to the target, the same does not hold at the secondary education level. Only 76 percent of students age 16 and older have adequate IEPs that account for postsecondary goals.⁴⁶ As a result of these discrepancies, the achievement gap between students with and without disabilities is growing in the District.

v. Jobs

As the table below shows, persons with disabilities are employed at extremely low rates across all jurisdictions participating in this analysis. The problem is most extreme in the District and least pervasive in Fairfax County, Gaithersburg, and Loudoun County, which are all also suburban areas with low unemployment and high labor force participation generally. As jurisdictions undertake efforts to increase access to employment for persons with disabilities, it is critical that the opportunities created be truly integrated and pay a decent wage. Under Maryland Code Health-Gen. § 7-207, sheltered workshops that pay below the minimum wage may not receive state funding in Maryland. By contrast, sheltered workshops that fail to pay minimum wage are still present in Virginia.

Table 37: Percentage of Population with a Disability That Is Employed, Ages 18–64

Jurisdiction	Population with a Disability That Is Employed, Ages 18–64 %
Alexandria	50.2%
Arlington County	50.2%
District of Columbia	32.5%
Fairfax County	58.6%
Gaithersburg	61.3%
Loudoun County	58.4%
Montgomery County	51.6%
Prince William County	54.2%

Source: 2019 American Community Survey one-year Estimates

4.b. Describe existing processes in the jurisdiction and the region for people with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

i. Government Services and Facilities

Jurisdictions in the region vary in the extent to which they clearly and publicly share information about reasonable accommodation processes and accessibility on local government websites. Three jurisdictions—Fairfax County, Loudoun County, and Montgomery County—have robust, well-organized accessibility pages on their sites that are directly accessed from the main page. The District of Columbia also links to its accessibility page from its main page, but the information presented there is not as comprehensive. Alexandria and Arlington County do not link to their accessibility pages from their main pages but do have accessibility pages that present useful information. Gaithersburg and Prince William County have extremely sparse information about accessibility on their websites.

ii. Public Infrastructure

Arlington County, the District of Columbia, Fairfax County, and Montgomery have dedicated portals for residents to make sidewalk-related requests on their websites, including accessibility requests, rather than routing individuals through more general accessibility request processes.

iii. Transportation

Major transportation providers in the region, including WMATA and Virginia Railway Express, include information about how to request reasonable accommodations on their websites.

iv. Proficient Schools and Educational Programs

School districts in the region generally have information about requesting accommodations posted on their websites.

v. Jobs

This analysis did not reveal specific information regarding reasonable accommodations policies for private employers. The description of website accessibility information for government services and facilities above has significant implications for access to public-sector employment.

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

Persons with disabilities face at least two significant barriers to accessing homeownership in the region. First, as discussed at great length above, persons with disabilities have lower income levels than individuals who do not have disabilities. Given the higher cost of homeownership in comparison

with renting in an area with expensive housing costs, homeownership is often out of reach. Second, single-family homes, which are not covered by the Fair Housing Act's design and construction standards, are the most significant source of owner-occupied units in the region. Multifamily units, by contrast, are comparatively more likely to be rental units. Single-family units may not be accessible to persons with mobility disabilities, in particular.

5. Disproportionate Housing Needs

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

As with homeownership, the comparatively low income levels of persons with disabilities fuel disproportionate levels of cost burden.

Factors Contributing to Disability and Access Issues

Please see the Contributing Factors section for the following Contributing Factors to Disability and Access Issues:

- access for persons with disabilities to proficient schools
- access to publicly supported housing for persons with disabilities
- access to transportation for persons with disabilities
- inaccessible government facilities or services
- inaccessible public or private infrastructure
- lack of access to opportunity due to high housing costs
- lack of affordable in-home or community-based supportive services
- lack of affordable, accessible housing in a range of unit sizes
- lack of affordable, integrated housing for individuals who need supportive services
- lack of assistance for housing accessibility modifications
- lack of assistance for transitioning from institutional settings to integrated housing
- lack of local or regional cooperation
- land use and zoning laws
- lending discrimination
- location of accessible housing
- loss of affordable housing
- occupancy codes and restrictions
- regulatory barriers to providing housing and supportive services for persons with disabilities
- source-of-income discrimination
- state or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, and other integrated settings

V. Fair Housing Enforcement, Outreach Capacity and Resources

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
- any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice
- a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law
- a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing
- pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination

There were no unresolved findings, compliance/conciliation/settlement agreements, claims, complaints, or lawsuits regarding fair housing and civil rights laws in the D.C. metropolitan region.

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

D.C. Laws

In 1977, Washington, D.C., enacted the District of Columbia Human Rights Act (D.C. Code § 2–1402.21), which prohibits discrimination in housing on the basis of race, color, religion, national origin, sex, age (18 years or older), marital status, personal appearance, sexual orientation, gender identity or expression, family responsibilities (supporting a person in a dependent relationship), political affiliation, disability, matriculation (enrollment in a college, university, or secondary school), familial status, source of income, place of residence or business, and status as a victim of an intrafamily offense (a person who was subjected to domestic violence, sexual assault, and stalking).

In 2016, Washington, D.C., enacted the Fair Criminal Screening for Housing Act (D.C. Code § 42–3541.02), which imposes several requirements for rental housing providers screening the criminal background of a housing applicant. The law requires rental housing providers to disclose, in writing, (1) the eligibility criteria used to decide whether to rent to the applicant and (2) a statement that the applicant may provide evidence demonstrating inaccuracies within the criminal record or evidence of rehabilitation or other mitigating factors. In addition, the law prohibits housing providers from making an inquiry or asking any questions related to an applicant’s criminal background or arrest history at any time prior to making a conditional offer of housing. After making a conditional offer, a housing provider may consider only a pending criminal accusation or criminal conviction that has occurred within the past 7 years.

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.

Equal Rights Center

The Equal Rights Center (ERC) is a private civil rights organization located in Washington, D.C., that identifies and seeks to eliminate unlawful and unfair discrimination in housing in the greater Washington area and nationwide. The ERC’s core strategy for identifying housing discrimination is civil rights testing. The ERC conducts tests and trains civil rights testers. The ERC also conducts fair housing trainings to educate the public, engages in policy advocacy, and takes action to enforce fair housing laws. In addition, the ERC conducts research and releases publications on fair housing.

Washington Lawyers' Committee for Civil Rights and Urban Affairs

Based in Washington, D.C., the Washington Lawyers' Committee for Civil Rights and Urban Affairs uses litigation, public education, and policy advocacy to fight housing discrimination. The Housing Justice Project at the organization handles a wide variety of issues, including predatory lending, discriminatory real estate advertising, insurance discrimination, exclusionary zoning, discrimination against families with children, and discrimination against low-income families who use housing subsidies.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Please see the Contributing Factors section for the following Contributing Factors to Fair Housing Enforcement, Outreach Capacity, and Resources:

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

VI. Fair Housing Goals and Priorities

The participating jurisdictions thoroughly considered input from many sources as they developed the fair housing goals and strategies below. Beyond local and federal data, these sources included public forums, stakeholder engagements, individual interviews, surveys, and guidance from the Community Advisory Committee.

The participating jurisdictions have chosen these shared goals and strategies as the ones that will be most impactful in reducing housing discrimination, reversing patterns of racial segregation, and improving access to opportunity for all current and future residents of the metropolitan Washington region.

A. Regional Goals

1. Increase the supply of housing that is affordable to low- and moderate-income families in the region, particularly in areas that have historically lacked such housing.

The metropolitan Washington region has high and ever-increasing housing costs, along with an unequal distribution of committed affordable housing, or housing restricted to those with low to moderate incomes, across its communities. For example, home values jumped over 11 percent last year in Prince William County, and the median home value in Arlington rose to almost \$800,000. As a result, there are significant fair housing challenges for members of protected classes in the region. Data indicates that among the most impacted groups in the region, Hispanic residents, Black residents, and persons with disabilities experience housing affordability and housing instability problems most acutely.

Many households are rent burdened, and racial and ethnic minorities face severe housing burdens at higher rates. For example, 25 percent of renters in the District of Columbia pay over 50 percent of their income on rent. In the region, 57 percent of severely burdened households were non-White, and 47 percent were immigrant households.

- a. *Use best practices from other jurisdictions and explore policies and programs that increase the supply of housing affordable to lower- and moderate-income households, such as housing bonds, real estate transfer taxes, mandatory inclusionary housing where permitted, as-of-right accessory dwelling units (ADUs), public land set aside for affordable housing, community land trusts, expedited permitting and review, and relaxation of parking requirements for affordable housing developments.*

The above policies and practices have resulted in an increase in affordable housing in jurisdictions throughout the country. In the region, there has been an increase in the supply of subsidized affordable housing in jurisdictions that have adopted these best practices.

- b. *Lower the income targeting of new rental housing affordable to people with incomes of 80 percent of the area median income (AMI) to 60 percent and below, with specific targeting of units affordable at 50 percent of the AMI or below in order to address the chronic housing shortage for low-income individuals and families.*

A number of jurisdictions require developers that utilize inclusionary zoning incentives to set aside affordable housing units for households with incomes of up to 80 percent of the AMI. Jurisdictions should target newly constructed affordable units for households with incomes at

or below 60 percent of the AMI through a combination of increasing incentives and lowering the number of set-aside units to make deeper affordability financially feasible.

- c. *Provide low-interest loans to develop ADUs with affordability restrictions on the property.*

ADUs (also known as accessory living units, or ALUs, in Fairfax County) are now allowed in all participating jurisdictions, with varying restrictions. Local governments should consider providing financial assistance or tax benefits to incentivize homeowners to make their ADUs affordable to HCV users. Because it can be difficult for homeowners to access bank financing to build ADUs, there may be a need to offer incentives. As a condition of receiving assistance, jurisdictions should also require homeowners to attend fair housing training and to maintain records that facilitate audits of their compliance with nondiscrimination laws. The need to educate individual homeowners who do not have experience as landlords and knowledge of the law may prevent unintentional and intentional violations of fair housing laws.

2. Reform zoning and land use policies to expand access to fair housing choice by increasing the development, geographic distribution, and supply of affordable housing.

The prevalence of single-family residential zoning in the region makes it challenging to develop committed affordable housing that could offer housing opportunities to members of protected classes. Many cities across the country are allowing greater zoning density to meet the demand for housing, resulting in lower development costs per unit and new condo and cooperative homeownership models.

- a. *Revise zoning regulations to allow as-of-right ADUs.*

Currently, the District of Columbia, Arlington County, Fairfax County, Loudoun County, and Montgomery County allow ADUs in most of their residential zones. ADUs have the potential to expand affordable housing options without expanding land development. This is particularly relevant in the region, where the preponderance of land is zoned for single-family housing.

- b. *Increase inclusionary zoning incentives for creating on-site affordable housing and increase fees in lieu of providing on-site affordable housing.*

Inclusionary housing programs often lack enough financial incentives for providing on-site affordable housing. Increasing these incentives along with increasing fees for developers who choose alternative compliance options will increase the likelihood of creating additional committed affordable housing units in high opportunity areas.

- c. *Adopt zoning changes that facilitate the development of affordable housing as of right.*

Multifamily housing remains the most effective way of producing deeply affordable housing that is critically necessary to meet the needs of Black and Hispanic households and persons with disabilities in the region. Zoning that allows affordable multifamily housing developments as of right in designated areas such as the Council of Government's "Activity Centers,"⁴⁷—denser, mixed-use housing and job centers—can reduce the cost of affordable housing development, thereby increasing the number of units that are able to be developed from year to year. Overlay districts are a way of achieving this goal while avoiding the opportunity cost of predominantly market-rate multifamily development and, particularly, development that yields few family-sized units and monopolizes desirable sites.

- d. *Incorporate a fair housing equity analysis into the review of significant rezoning proposals and specific plans.*

Several large new developments in the region have not sufficiently addressed the needs of members of protected classes who have been displaced or priced out of the area. Incorporating a fair housing analysis in the review process for these plans, similar to what the City of Boston recently implemented, could reduce displacement and other negative impacts for members of protected classes.⁴⁸

- 3. Implement policies designed to preserve affordable housing and prevent displacement with a goal of no net loss of existing affordable rental units.**

The region lost a significant number of affordable housing units during the past decade due to the compounding impacts of reduced housing production, decreased federal investment in deeply affordable housing, and a lack of local resources to acquire and preserve housing affordable to lower-income households. In the region, there was a loss of more than 85,000 rental units with monthly rents under \$1,500 and an increase of more than 40,000 rental units with monthly rents \$2,500 and above. The region must prioritize the preservation of its existing affordable stock as a necessary complement to increasing its supply of affordable housing.

- a. *Preserve affordable subsidized and market-rate housing, including manufactured housing, by tracking and supporting existing affordable housing and establishing an acquisition loan fund for tenants, nonprofit organizations, and local governments to purchase for-sale apartments and manufactured home parks.*

There are a significant number of committed affordable housing developments that are coming to the end of their affordability requirements. There is little incentive for these owners to renew subsidy contracts in higher opportunity areas or in areas that are experiencing rapid gentrification, which is the majority of the region. It is generally more cost-effective to preserve existing affordable housing than it is to build new affordable housing, particularly in areas with high land costs. Accordingly, jurisdictions should track affordable housing developments, particularly those in higher opportunity or rapidly gentrifying areas, and work with nonprofit housing developers to provide financial support for property acquisition and rehabilitation. Additionally, all for-profit developers of proposed affordable housing projects, including those funded through the LIHTC program, should be required to provide a right of first refusal to tenants, nonprofit organizations, and local governments seeking to maintain affordability after rent restrictions are lifted. For manufactured home parks—one of the most important sources of unsubsidized affordable housing in the region, particularly in its more rural areas—homeowners should be provided an opportunity to purchase their communities with technical assistance from nonprofit organizations such as ROC USA.

- 4. Increase the number of homeowners in the region and reduce inequities and discriminatory practices that limit homeownership opportunities for members of protected classes.**

The greater metropolitan Washington region has been facing an affordability crisis in homeownership as well as in rental housing. In the past year alone, housing prices rose almost 11 percent, making homeownership out of reach for the majority of residents, particularly members of protected classes.

- a. *Increase homeownership opportunities for low- and moderate-income members of protected classes through the following strategies:*

- Support innovative approaches specifically designed to increase homeownership opportunities, such as cooperative homeownership models and community land trusts.
 - Support policies and practices that will increase the supply of affordable homeownership housing units, such as allowing and encouraging higher-density, smaller units/ADUs and duplexes.
 - Ensure that affordable housing set-asides in new housing developments include subsidized home ownership opportunities in addition to subsidized rental opportunities.
 - Increase housing affordability through mortgage write-downs, down payment and closing cost assistance, special purpose credit programs, and other affordable homeownership subsidies.
 - Support first-time homebuyers by expanding financial literacy programs, homeownership counseling, and homebuyer education.
- b. *Support current homeowners with protected characteristics, including racial and ethnic minorities, persons with disabilities, and seniors, through the following strategies:*
- Increase funding for repair, rehabilitation, and renovation programs and products.
 - Expand programs that provide energy efficient improvements to lower utility costs.
 - Provide comprehensive foreclosure prevention counseling and legal referrals.
- c. *Reduce inequities and discriminatory practices that exacerbate the wealth gap between White households and households of color by addressing issues of appraisal bias and by increasing fair housing testing and monitoring for lenders and real estate entities. Use local and regional Community Development Financial Institutions (CDFIs) to target members of protected classes to reduce inequities in mortgage lending.*

5. **Protect the housing rights of individuals with protected characteristics.**

Evictions and significant rent increases contribute to the displacement of protected class members, particularly Black and Hispanic residents and persons with disabilities. The pandemic has highlighted the vulnerability of renters and its racial and ethnic disparities.

- a. *Expand locally funded housing voucher programs, increase the scale and scope of housing mobility programs, and improve the portability of vouchers across jurisdictions in the region.*

Housing mobility is an important tool to address high segregation levels in the HCV program. In many places in the region, voucher families have been limited in where they can live. Additional local resources, along with increased mobility strategies and better coordination throughout the region, will give families a broader range of housing options.

- b. *Reduce barriers to accessing rental housing by encouraging landlords to reduce, eliminate, or offset application fees for voucher users and follow HUD's guidance on the use of criminal backgrounds in screening tenants.*

Stakeholders reported that high application fees for rental housing are a significant barrier for voucher holders. Additionally, some landlords continue to refuse rental housing to prospective tenants based on criminal background checks revealing decades-old criminal histories or minor misdemeanors.

- c. *Pilot a Right to Counsel program to ensure legal representation for tenants in landlord-tenant proceedings.*

Thousands of residents in the region are displaced annually due to evictions. According to local legal services and fair housing organizations, many evictions occur because tenants do not understand their rights and/or their obligations. It is estimated that only a small percentage of tenants facing eviction have legal representation, and those without representation almost always are evicted, regardless of a viable defense. In 2021, Maryland passed a Right to Counsel bill that would provide access to counsel for low-income tenants facing eviction, but it is inadequately funded. There are several legal providers in the region that are well positioned to serve low-income tenants, including undocumented tenants. Although there would be an up-front investment, legal representation is less costly than serving families experiencing homelessness.

- d. *Expand and increase support for fair housing outreach, education and training, testing, and enforcement.*

Support organizations that provide fair housing outreach, education, and enforcement and expand the number of protected classes tested annually. Although Virginia, Maryland, and the District of Columbia require landlords to accept HCVs, tenants report that some landlords continue to refuse vouchers. Landlords have also refused to participate in the Emergency Rental Assistance Program, preferring to file for eviction instead. Tenants facing eviction reported difficulties in accessing these emergency rental assistance funds, and victims of housing discrimination did not know where to get help. Some jurisdictions reported that there was limited fair housing testing and no testing for discrimination against persons with disabilities.

The metropolitan Washington region recognizes 12 protected classes in common; 7 are federal, with the balance designated by the District of Columbia, Maryland, and Virginia. Beyond the federal classes, fair housing protections in the two states and the District of Columbia include marital status, age, elderliness (age 55 or older), sexual orientation, gender identity or expression, and source of income. Expanding testing beyond race and ethnicity on an annual basis could identify and address discriminatory practices and reduce harm to residents.

Fair housing organizations and legal services providers play a critical role in fair housing enforcement, education, and outreach but struggle to meet the full needs of victims of discrimination due to limited financial and staff capacity. By supporting these organizations, jurisdictions can help ensure that these organizations can address existing and critical emerging issues, like source-of-income discrimination and emergency rental assistance.

6. Increase community integration and reduce housing barriers for persons with disabilities.

- a. *Increase the supply of permanent supportive housing units by utilizing innovative funding streams, like affordable housing bonds, affordable housing trust funds, commercial linkage fees, and real estate transfer taxes.*

Federal funding sources such as CDBGs and HOME and inclusionary zoning are not sufficient to meet the total need for permanent supportive housing for persons with disabilities. Additionally, some program rules for federal housing programs may disproportionately exclude persons with disabilities generally or persons with specific types of disabilities on the basis of criminal history and directly exclude undocumented persons with disabilities based on immigration status. Deeply affordable housing utilizing the above funding mechanisms could help increase the supply of such housing. In designing incentives, jurisdictions could utilize

existing priorities for permanent supportive housing in Qualified Allocation Plans (QAPs) to encourage permanent supportive housing set-asides in new developments. Additionally, jurisdictions should prioritize using that funding to support developments that would be eligible for the Section 811 Project Rental Assistance Program.

- b. *Advocate for the adoption of design standards that require at least 10 percent of total units in new multifamily developments receiving public funds to be accessible to persons with mobility disabilities and at least 4 percent for persons with hearing and/or vision disabilities.*

Persons with disabilities, including seniors, have expressed difficulty in finding accessible housing. Some jurisdictions in the region have adopted this higher standard to increase housing options for persons with disabilities, and the higher standard should become uniform throughout the region.

- c. *Increase support for rental assistance programs for persons with disabilities and advocate for additional resources.*

Programs like Virginia's State Rental Assistance Program (SRAP) provide much-needed rental assistance to persons with disabilities. Increasing this assistance will provide options for persons with disabilities who are leaving institutions or are at risk of institutionalization and who are at high risk of becoming homeless.

- d. *Support fair housing testing that investigates barriers identified by case managers who assist persons with disabilities in finding integrated housing.*

Fair housing testing is most effective as a civil rights tool when it targets structural barriers that play a significant role in perpetuating segregation. Case managers who assist persons with disabilities, particularly those exiting institutions, homelessness, or incarceration, with securing housing are uniquely positioned to be able to identify patterns across large landlords that make it harder for persons with disabilities to find homes and maintain stable tenancy.

- e. *Support education regarding the application of the Fair Housing Act's reasonable accommodation duty in the context of criminal history screening.*

Persons with disabilities are disproportionately likely to have contact with the criminal justice system and also to be the victims of crime. Some contact with the criminal justice system has a causal connection to individuals' disabilities and law enforcement's inadequate training and capacity to deescalate difficult situations. In many instances, persons with disabilities may be entitled to reasonable accommodations that allow them to qualify for units for which they might otherwise be ineligible due to landlords' criminal history screening policies. Focused education for landlords on this point would help ensure that accommodation requests in this context are responded to appropriately.

- f. *Improve the tracking and mapping of the locations of affordable, accessible restricted units and the accessibility of surrounding streets and sidewalks.*

Tenants expressed frustration with the absence of a database with ADA-accessible housing units. Identify ways to develop and maintain this list, make it available on the jurisdiction's website, and distribute it to organizations serving persons with disabilities. Additionally, it is important to ensure that the surrounding streets and sidewalks are also accessible.

7. Expand access and affordability of public transportation for members of protected classes.

High housing costs in the region have forced many low- and moderate-income residents, including members of protected classes, to move further away from their jobs and reliable public transportation. This, in turn, can exacerbate disparities in employment and can also burden employers who cannot find local residents to hire.

- a. *Identify resources to expand free or reduced-fare bus and paratransit transportation to low-income households.*

Transportation barriers for members of protected classes increase with rising displacement. Data shows that low-income households are much more likely to utilize bus services. Providing free bus transportation to lower-income households would help facilitate access to jobs and services.

- b. *Study and make recommendations to improve, expand, and coordinate bus routes across jurisdictions to ensure that members of protected classes can access jobs in employment centers.*

As members of protected classes are forced to live further from their jobs as a result of displacement due to soaring housing costs, public transportation options become less viable. Bus routes should be expanded or rerouted to ensure that there is a match between where low- and moderate-income members of protected classes—who are more likely to use public transportation—live and work.⁴⁹ Additional funding may be required to accomplish this.

B. D.C. Goals

- I. **Increase the supply of housing that is affordable to low- and moderate-income families through the following strategies:**
 - a. *In addition to providing down payment assistance, provide financing for the construction of affordable home ownership.*
 - b. *Convert some congregate shelters, all of which are owned by the District, into permanent affordable housing.*
- II. **Reform zoning and land use policies to expand access to fair housing choice by increasing the development, geographic distribution, and supply of affordable housing.**
 - a. *Upzone near commercial corridors in ward 3, and increase the number of affordable housing units required under the IZ program.*
 - b. *Expand D.C.'s IZ provisions to the downtown D-6 zone using tax incentives.*
- III. **Protect the housing rights of individuals with protected characteristics.**
 - a. *Examine rent control regulations to identify policies such as rent control exemption for units occupied by voucher holders and their impacts on fair housing outcomes.*

VII. Contributing Factors

Access for Students with Disabilities to Proficient Schools

Alexandria

In the most recent IDEA report from 2019, the City of Alexandria performed near state targets on most indicators, but obstacles remain in others. For example, 65 percent of Alexandria students with Individualized Education Programs (IEPs) are included in regular classroom instruction for at least 80 percent of the day, compared with the state target of 70 percent. However, 36 percent of children ages 3–5 continue to attend separate educational facilities when the state target is 17 percent.⁵⁰ Timely development of adequate IEPs in Alexandria is strong, and representation among children with disabilities is commensurate with the demographics of the district as a whole.

Arlington County

Of Arlington County's 27,000 students, 14.3 percent receive special education services. Arlington County schools consistently rank among the highest-performing in Virginia and in the nation, but barriers remain in access to opportunities for individuals with disabilities. The demographic disparities between students referred for IEPs and the overall population of Arlington Public Schools are small. However, there are racial, class, and language disparities among students referred for supplementary aids and services provided under Section 504 of the Rehabilitation Act that are significant: White students are overrepresented (66 percent of Section 504 referrals vs. 45 percent of the APS population), and economically disadvantaged students (8 percent vs. 32 percent) and English learners (6 percent vs. 30 percent) are underrepresented.⁵¹

APS has routinely fallen short of the state target for the percentage of early childhood students with disabilities who spend the majority of their time in regular early childhood programs; in 2016–2017, this was 27 percent for APS, while the state target was 33 percent.⁵² However, APS exceeded state targets in preparing students with disabilities for the postsecondary transition, with 60 percent of such students enrolling in higher education within one year of leaving high school, compared with the state target of 35 percent.⁵³

District of Columbia

Students with disabilities comprise nearly 20 percent of all students in the District. The Office of the State Superintendent of Education (OSSE) has implemented a variety of initiatives to attempt to increase access to proficient schools for these students, but significant barriers remain. Nearly 25 percent of the 3,253 students with disabilities who are transported by OSSE to school spend two hours or more on the bus to school each day.⁵⁴

Accessibility in schools is evaluated using the Individuals with Disabilities Education Act, which requires all states and the District of Columbia to annually assess accessibility standards in public schools. In the District's latest report, from 2019, the percentage of children with IEPs who spent 80 percent or more of the school day inside regular classrooms (57 percent) fell well short of the target (64 percent).⁵⁵ This discrepancy begins in preschool education and continues through high school. Moreover, of the 1,770 students with disabilities, over 66 percent exited special education by dropping out of the school system.⁵⁶

Although there appears to be no overrepresentation of particular racial or ethnic groups or particular disabilities among the District's population of students with disabilities, the identification of these students and the implementation of IEPs continues to be inadequate. Only 86 percent of children whose parents had consented to an IEP evaluation received one within 60 days.⁵⁷ And though IEP development for early childhood is close to the target, the same is not true for the secondary education level. Only 76 percent of students ages 16 and above have an adequate IEP that accounts for

postsecondary goals.⁵⁸ As a result of these discrepancies, the achievement gap between students with and without disabilities is growing in the District.

Fairfax County

The most recent IDEA report from 2019 found that although Fairfax students with disabilities participate and perform well in academic assessments compared with state targets, access to educational infrastructure remains inadequate. Only 54 percent of Fairfax students with IEPs are included in regular classroom instruction for at least 80 percent of the day, compared with the state target of 70 percent, and 46 percent of children ages 3–5 continue to attend separate educational facilities when the state target is 17 percent.⁵⁹ Nonetheless, timely development of adequate IEPs in Fairfax is strong, and representation among children with disabilities is commensurate with the demographics of the district as a whole.

Gaithersburg

See Montgomery County.

Loudoun County

In Loudoun County, fewer impediments to educational access for students with disabilities exist in comparison to other jurisdictions. Fewer than 0.5 percent of students with disabilities drop out, and 79 percent graduate from high school with a regular diploma. However, 68 percent of students with disabilities are including in regular classroom instruction for at least 80 percent of the day, below the state target.⁶⁰ Additionally, 27 percent of children ages 3–5 attend separate educational facilities, above the state target of 17 percent.⁶¹

Montgomery County

Montgomery County does not appear to have released aggregated data on educational outcomes for students with disabilities. As of October 2018, there were 19,848 students with disabilities enrolled in special education, 12 percent of the total enrollment.⁶² Hispanic and Black students with disabilities are overrepresented at 35 percent and 26 percent, respectively.⁶³

Prince William County

Prince William County's 2018 IDEA report shows a graduation rate for students with IEPs of 64 percent, which is higher than the state target rate of 56 percent.⁶⁴ The county has a dropout rate of 1.5 percent, which is slightly higher than the state target rate. The report also identified a significant discrepancy in the rate of suspensions and expulsions for children with IEPs. The rate of students included in regular classrooms 80 percent or more of the day is 65 percent, which is below the state target rate of 70 percent.⁶⁵ Among children ages 3–5 with IEPs, the rate of children in separate educational facilities is 30 percent, significantly higher than the state target of 17 percent.⁶⁶

Access to Financial Services

Region

Access to financial services is a contributing factor to fair housing issues in the District of Columbia, but is not a significant factor to fair housing issues in surrounding municipalities. Residents of the District of Columbia are unbanked at a far higher percentage than surrounding municipalities. According to 2022 Prosperity Now Scorecard, all municipalities with data had a higher percentage of unbanked people of color than White/Non-Hispanic.⁶⁷ The District of Columbia had the greatest unbanked discrepancy, with 1.1 percent of White/Non-Hispanic households unbanked compared with 12.7 percent of people of color.⁶⁸

Table 38: Access to Financial Services

Municipal ity	Population Estimate July 1, 2019 ¹	Minority Population ¹ %	Unbanked ² %	FDIC- Regulated Institutions ³	FDIC- Regulate d Full- Service Brick and Mortar Branches ⁴	FDIC- Regulate d Non- Brick and Mortar Branches ⁴
City of Alexandri a	159,428	33.3%	4.0%	15	32	2
Arlington County	8,535,519	25.0%	2.5%	24	58	3
District of Columbia	705,749	54.0%	8.0%	32	197	15
Fairfax County	1,147,532	35.3%	2.4%	39	273	19
Loudoun County	413,538	33.0%	1.6%	23	85	7
Montgom ery County	1,050,688	40.0%	2.8%	28	252	19
Prince William County	470,335	37.6%	3.2%	16	65	4

Sources: 1. US Census Bureau, *Quick Facts*, 2020, <https://www.census.gov/quickfacts/fact/table/US/PST045219>.

2. Prosperity Now, *Local Outcome Report*, September 2021, <https://scorecard.prosperitynow.org/reports#report-local-outcome>

3. "Details and Financials—Institution Directory," FDIC (website), <https://www7.fdic.gov/idasp/advSearchLanding.asp>.

4. "Institution Directory," FDIC (database), https://www7.fdic.gov/idasp/warp_download_all.asp.

There are a significant number of financial institutions and physical banking locations available to residents in the metropolitan D.C. area. However, mere physical access to financial institutions does not preclude the possibility of predatory lending practices nor does it assure access to banking institutions (see Lending Discrimination Contributing Factor).

Access to Publicly Supported Housing for Persons with Disabilities

In the region, housing choice vouchers (HCVs) are the primary form of publicly supported housing support for persons with disabilities; project-based Section 8 provides a disproportionately lower rate of housing for individuals with disabilities than other programs.

In Maryland, residents with disabilities tend to have low incomes; therefore, there is a significant need for affordable housing, including publicly supported housing. Based on a study performed by the Maryland Department of Health services, at least half of all residents who have a disability had a household income of less than \$15,000.⁶⁹ Additionally, the population of elderly residents is expected to increase to over 20 percent of the total population, and currently almost 195,000 elderly residents are cost burdened.⁷⁰ Similarly, Virginia has a high rate of individuals with disabilities who live in

poverty: an estimated 20 percent.⁷¹ Additionally, as in Maryland, the population of elderly residents is also predicted to substantially increase in the next 10 years. Consequently, there is significant demand among individuals with disabilities for access to publicly supported housing and this need is likely to increase in the coming years.

Data from HUD shows that, across jurisdictions, persons with disabilities are underrepresented in project-based Section 8 developments in relation to their proportion of the income-eligible population. Because local governments in the area do not play a direct role in the administration of project-based Section 8 developments, support for fair housing organizations to engage in testing of these developments may be the most effective way to address this underrepresentation. Although the data do not show similar disparities for other types of publicly supported housing, low-income persons with disabilities may also have limited access to Low Income Housing Tax Credit (LIHTC) units due to the way rents are set in those developments. In LIHTC developments, affordability is generally targeted at households making 50 percent or 60 percent of the area median income (AMI). Because over half of residents with disabilities in Maryland have household incomes under 30 percent of the AMI, many do not meet the AMI requirements for LIHTC development.

In the region, most residents with a disability rely on HCVs, although the proportion of multifamily dwellings and project-based housing in some jurisdictions provides additional housing options. Despite the prevalence of HCVs, those with ambulatory disabilities lack sufficient accessible housing due to the lack of accessibility features.

Regionally, HCVs provide the primary form of publicly supported housing support. A much higher percentage of residents of other multifamily housing in the region have disabilities than do most jurisdictions. Included in other multifamily developments are Section 811 developments, which target persons with disabilities, and Section 202, which target elderly individuals, who are disproportionately persons with disabilities. Additionally, although the proportion of residents with disabilities in other multifamily housing is high compared with other programs in several jurisdictions, the total amount of available multifamily housing is significantly lower than the amount of housing available through the HCV program. Although HUD does not provide regional data reflecting the percentage of HCV users with disabilities, it provides these data by jurisdiction for other CDBG recipients.

Table 39: Housing Choice Voucher Users with Disabilities by Jurisdiction

Jurisdiction	Persons with Disabilities #	Persons with Disabilities %
Alexandria	214	15.82%
Arlington County	318	21.98%
District of Columbia	2,994	24.75%
Fairfax County	705	17.75%
Gaithersburg	101	17.32%
Loudoun County	140	24.14%
Montgomery County	1,141	16.78%
Prince William County	442	19.95%

In the District, where almost 12 percent of the population report having a disability, persons with disabilities appear to be able to access public housing and HCVs at rates that are at least commensurate with the portion of the income-eligible population that has disabilities. The same is not true with respect to project-based Section 8 units, in which the percentage of residents with disabilities is lower than the percentage of all District residents with disabilities and is presumably much lower than the percentage of the income-eligible population that has disabilities. The reason for this disparity is not clear. Because the other multifamily housing category includes several programs with very

different purposes and because there are relatively few other multifamily developments in the District, it is not clear whether persons with disabilities face structural barriers to accessing that housing.

The District also administers tenant-based rental assistance programs and other supportive housing assistance that specifically targets persons with particular types of disabilities. Within these programs, there is no underrepresentation of persons with disabilities. The Department of Mental Health's *Supportive Housing Strategic Plan, 2012–2017* reported that there were 675 Home First tenant-based vouchers available for persons with psychiatric disabilities, in addition to those provided through the HCV program, and that the District had funded project-based rental assistance for 121 units of permanent supportive housing for the same population. The Department of Disability Services also provides rental assistance to persons with developmental disabilities, though data on the number of individuals served is not available. Family members of individuals with developmental disabilities have reported difficulties in finding housing within the District for their loved ones with this assistance because payment standards are not as generous as they are for the HCV program. As a result, some individuals with developmental disabilities who are from the District reside outside the regional parameters in Montgomery County, Maryland, while receiving services funded by the District.

Of the other jurisdictions in the region, only Loudoun County has a greater proportional representation of persons with disabilities among its voucher holders than the District does. Additionally, this jurisdiction is among the smallest in terms of the total number of vouchers in use. This suggests that suburban public housing authorities may not be doing as much as the District of Columbia Housing Authority to prioritize serving persons with disabilities. At the same time, it should be noted that the overall share of persons with disabilities, at approximately 9 percent, is significantly lower regionwide than it is in the District.

Montgomery County has the second-largest population of persons with disabilities in the region. As is the case in other jurisdictions, a much lower proportion of individuals with disabilities use project-based Section 8 housing compared with other programs like HCVs and other multifamily housing, both of which offer a significantly larger proportion of available affordable units. While multifamily dwellings in Montgomery County do have a higher proportion of residents with disabilities than HCV units do, the latter provides the largest number of publicly supported housing units throughout the county. But, as noted above, HCVs may offer limited accessibility for individuals with ambulatory impairments.

Access to Transportation for Persons with Disabilities

Access to transportation for persons with disabilities is a significant contributing factor. In Virginia, the elderly population is predicted to increase to 20 percent of residents by 2030,⁷² the largest population increase of any demographic. The state recognizes that as the elderly population increases, the demand for public transportation will increase as well, but as it admits in its *2018 Assessment of Disability Services in Virginia* study, there is insufficient transportation of this type to accommodate rising demand.⁷³ The outpaced demand for transportation also disproportionately impacts individuals with disabilities, who also tend to rely on public transportation to travel. Similarly, although Maryland has more extensive public transportation modes for individuals with disabilities, less extensive infrastructure in suburban areas reduces access for individuals with disabilities.

Bus and Rail

WMATA serves the entire region, and explicitly outlines on its website the measures taken to enhance access to its rail and bus systems for persons with disabilities. Fare vending machines have accessibility features including instructions in Braille with raised alphabets and a button for audio instructions. All stations have at least one extra-wide faregate for wheelchair access, and all stations except Arlington cemetery use bumpy tiles to alert customers with low vision that they are nearing the

edge of a platform. Rail cars also provide priority seating for persons with disabilities and gap reducers have been installed on all rail cars to make it easier for an individual with a mobility support to enter and exit the car safely. For Metrobus, all buses are wheelchair accessible and have both audio and visual stop announcements. If the automated announcement system fails to work, bus operators are supposed to announce major intersections, landmarks, and transfer points. There are a variety of other measures as well.⁷⁴

One notable concern with the WMATA Metrorail system is the operating quality of elevators. They are deteriorating, and result in patrons being trapped in the elevator.⁷⁵ Also, at stations with multiple entrances, signage directing people to elevators can often be scarce, making it difficult to locate the elevator.⁷⁶ Because elevators are a primary access point to the metro station for individuals with disabilities, these dysfunctional elevator features are likely to disproportionately limit transportation access for transit riders with disabilities. This trend may change due to an influx of federal dollars allocated to target elevator repairs.

Virginia Railway Express,⁷⁷ the Maryland Transit Administration,⁷⁸ the DC Circulator,⁷⁹ ART buses,⁸⁰ and Montgomery County Ride On buses use similar measures to Metrorail and Metrobus.⁸¹ Prince William County's OmniRide,⁸² Loudoun County Local Bus Service,⁸³ and the Fairfax County Connector⁸⁴ and CUE buses are wheelchair accessible, however their website does not specify if bus operators are instructed to announce major intersections, landmarks, and transfer points.⁸⁵ The Alexandria DASH bus system is wheelchair accessible, provides bus service within the city, and connects with Metrobus, Metrorail, Virginia Railway Express, and other local bus systems. However, the Dash Bus system website does not elaborate on what, if any, other measures are taken to make the system accessible to persons with disabilities.⁸⁶ The fare is typically two dollars but individuals with disabilities may ride for free if they have a valid MetroAccess or Alexandria DOT Paratransit card.⁸⁷

Paratransit

WMATA also runs MetroAccess, a door-to-door paratransit program throughout the entire region. Some MetroAccess customers are entitled to free rides on Metrorail and Metrobus. However, Metroaccess does not provide same day trip service. Fares can also be expensive, and cost up to \$6.50 per trip.⁸⁸ WMATA also offers an even more costly service called Abilities Ride, which provides eligible individuals to receive same-day transportation services through a local taxi company. The individual pays for the first five dollars of the cost of the trip, WMATA pays for the next fifteen dollars, and then the rider is responsible for paying the amount exceeding twenty dollars.

The Alexandria DOT offers a paratransit program similar to MetroAccess seven days a week for residents of Alexandria who are unable to use public transportation. Similar to MetroAccess, trips must be scheduled a minimum of one day in advance. Trips inside the city and within five miles of the city cost four dollars each way, and trips to areas more than miles outside the city cost six dollars each way. Availability of the para-transit program may also be limited to high priority trips depending on the status of the COVID-19 pandemic.⁸⁹ Arlington,⁹⁰ Loudoun County,⁹¹ and MDOT⁹² also offer similar paratransit programs that do not take same day reservations.

Admissions and Occupancy Policies and Procedures, Including Preferences in Publicly Supported Housing

District of Columbia

The D.C. Housing Authority exercises a series of preferences on its public housing waiting list. Elderly families and families with a household member with a disability receive preference, as well as working families and unhoused people.⁹³ The D.C. Housing Authority may deny access to public housing to

individuals who have been convicted of a violent crime or who have been documented as participants in one (regardless of their conviction), though enforcing this preference is not required.⁹⁴

Overall, however, the shortage of public housing in the District is due less to preferences in allocation of such housing; the waiting list has been closed since 2013. Additionally, within the past two years, the District has allocated only 56 percent of its housing vouchers reserved for individuals and an even more meager 37 percent of those reserved for families.⁹⁵ This has exacerbated the District's housing problem and prevented large numbers of individuals from gaining admission to affordable housing.

Virginia

Most governments in the region do not provide explicit information about their preferences for publicly supported housing or other housing-related services. Alexandria is unique in its maintenance of separate lists for different housing programs, including a priority list for unhoused individuals and individuals in supported housing, as well as a list for elderly people and persons with disabilities.⁹⁶ Other jurisdictions in the region, such as Fairfax County, have large numbers of individuals and families on third-party waiting lists, many of which may also be subject to preferences.⁹⁷ Overall, however, preferences and other admissions policies appear to be a less significant barrier than other impediments examined in this analysis.

Maryland

Montgomery County Housing Opportunities Commission's HCV waiting list operates on a system of preferences for those displaced by government action; those who live, work, or have been hired to work in Montgomery County; persons with disabilities; veterans; and those with a history of homelessness.⁹⁸ Though preferences for the county's other housing programs, including public housing, are not explicitly stated, they are likely similar.

Availability of Affordable Units in a Range of Sizes

As discussed in Location and Type of Affordable Housing (page XX), affordable housing in the region is available in a range of unit sizes. However, this availability may not necessarily meet the demand for specific unit sizes, and not every local government lists unit size in its housing directory. Thus, affordable units in appropriate sizes may not always be accessible to those who need them. The shortage of available housing units for larger families is particularly acute, and most large families rely on HCVs for suitable units rather than public housing and other types of publicly supported multifamily housing.

Availability, Type, Frequency, and Reliability of Public Transportation

Availability, type, frequency, and reliability of public transportation is a significant contributing factor to impediments to fair housing. Metropolitan Washington is served chiefly by Metrorail and Metrobus services operated by WMATA, which has a reputation for delays, unreliability, and inaccessibility. WMATA's latest performance report, from the second quarter of 2021, shows that Metrobus and Metrorail are both performing near or above targets in almost all safety and quality indicators.⁹⁹ However, because ridership remains significantly depressed due to COVID-19, it is more instructive to look at the last pre-pandemic performance report, from fiscal year 2019. This report shows significant improvement on previous years, which have been marked by numerous delays, breakdowns, and even death due to fire, but also shows room for further improvement. The bus fleet, which is more accessible and widespread than rail, remains somewhat unreliable. Buses, on average, traveled just over 6,300 miles between service interruption and experienced approximately 67 bus collisions per 1 million miles driven.¹⁰⁰ There was no on-time bus performance reported because of data quality errors.¹⁰¹

MetroAccess, the door-to-door paratransit service, showed an on-time performance rate of 90 percent.¹⁰²

WMATA operates 6 lines serving 91 rail stations in the District, Maryland, and Virginia.¹⁰³ However, stations are frequently far away from each other, so riders may need to take buses to transfer from one station to another or to reach their destination from a rail station. In addition to bus, rail, and MetroAccess, WMATA operates parking spaces at 44 Metrorail stations, costing approximately \$5 per day.¹⁰⁴

Metropolitan Washington is also served by Capital Bikeshare, which is owned by Lyft and offers 4,500 bikes across over 500 stations in the District, Maryland, and Virginia. A single trip costs \$1.00 to unlock plus \$0.15/minute, while annual membership costs approximately \$8.00 per month.¹⁰⁵ Bikes are concentrated in downtown D.C., although stations are spread throughout the region, including in lower-income areas in southeast D.C., Virginia, and Maryland.¹⁰⁶ Bike shares are widely used, with over 254,000 trips taking place in May 2021 alone.¹⁰⁷

Nonetheless, the District's truly public transport options, bus and rail, remain subject to significant quality defects. Though public transport is available, its frequency and reliability is subject to variation, and the variety of options available is also limited, especially for persons with disabilities and for those who live outside downtown D.C.

Community Opposition

District of Columbia

Although the District is known as a Democratic stronghold with progressive leanings in the realm of social justice, this image has often failed to hold true when it comes to support for affordable housing. Of particular importance has been the geographically inscribed gap between the District's White population and its residents of color, which mirrors the divide between its wealthiest and lowest-income communities. Efforts by the government of Mayor Muriel Bowser to build affordable housing, including in wealthier neighborhoods, have faced opposition due to fears of congestion and altering the character of communities in undesirable ways.¹⁰⁸ Although most District residents believe the current housing situation is unfair, many have also been slow to support efforts to expand affordable housing outside its geographically concentrated current presence.¹⁰⁹ However, within the past year, District residents have become increasingly aware of segregative housing issues, and many have begun to speak up against exclusionary zoning and similar problems.

Virginia

Earlier this year, Virginia became the third state in the nation to implement legislation barring the denial of building permits to housing developments on the grounds that those developments will contain affordable housing units.¹¹⁰ This law, which attempts to combat the NIMBY (not in my backyard) perspective and the desire of wealthy communities to maintain their self-segregation, paves the way for more equitable housing in northern Virginia and reflects a trend away from community opposition to fair housing. It offers a contrast to the opposition to affordable housing that influenced many planning decisions in the early 2010s. Nonetheless, community opposition remains a problem, especially in rural areas.¹¹¹ Earlier this year, for example, Loudoun County scrapped plans for a mixed-income housing development due to neighborhood protests.¹¹² Local governments in northern Virginia, like their counterparts in the District, are beginning to critically examine exclusionary zoning policies.¹¹³ However, mere policy changes may not be enough to dismantle opposition to the creation of more affordable housing in the region.

Maryland

Montgomery County has often been a site of controversy regarding affordable housing, even as it has sought to increase housing inclusion and affordability in recent years. The 2022 county executive campaign has brought the issue of affordable housing to the forefront, with a discourse centering on the need for affordable housing versus economic development.¹¹⁴ There has also been community opposition to the proposed Thrive Montgomery plan, which would allow duplexes and triplexes in some single-family neighborhoods.¹¹⁵ Thus, it appears that community opposition to affordable housing not only exists in Montgomery County, but also manifests within the county's government and political discourse.

Deteriorated and Abandoned Properties

Though the District of Columbia has gentrified significantly in recent years, rapid development of new housing has not kept properties from falling into disrepair. The D.C. Department of Housing and Community Development's Property Acquisition and Disposition Division (PADD) maintains a portfolio of vacant and abandoned properties, nearly two-thirds of which are located in Wards 7 and 8, the lowest-income wards in the city.¹¹⁶ PADD attempts to repair these properties into livable homes, but its work only addresses a small fraction of the deteriorated and abandoned properties in the District. As of 2016, the Department of Consumer and Regulatory Affairs' Vacant and Blighted Enforcement Unit maintained a list of around 1,200 vacant properties, but loopholes and inadequate reporting mean that this number is also likely to be a significant underestimate.¹¹⁷ A 2017 auditor's report revealed that the number is likely closer to 2,000 properties.¹¹⁸

The problem appears to be less significant in surrounding areas of metropolitan Washington, D.C., especially as house prices have increased rapidly throughout 2020 and 2021. Deteriorated and abandoned properties tend to be concentrated in the District and do not appear to have been extensively catalogued elsewhere.

Displacement of and/or Lack of Housing Support for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

District of Columbia

One in three women experiencing homelessness in the District cites domestic violence as the cause of her housing instability.¹¹⁹ The District is home to a number of domestic violence shelters and emergency shelters (not specific to domestic violence), as well as the District Alliance for Safe Housing, which provides housing services and an emergency fund for victims of domestic violence. The Domestic Violence Housing Continuum was founded in 2016 to encourage dialogue and collaboration in the realm of housing for victims of domestic violence. Despite the existence of these services, DASH identified a one-to-five ratio of survivors placed in housing versus those turned away due to no housing options.¹²⁰

Virginia

Several northern Virginia counties offer support services for those displaced by domestic violence, including shelters and support for housing and utilities. Nonetheless, domestic violence affects approximately 25 percent of households in northern Virginia.¹²¹ Low-income, immigrant, and refugee families are particularly vulnerable.¹²² Shelters specifically dedicated to domestic violence remain few within any given locality; for example, Doorways' Domestic Violence Safehouse, which serves 60–80 people per year, is the only domestic violence shelter in Arlington County, and those who stay at the safehouse remain only for short periods.¹²³

Maryland

The Betty Ann Krahnke Center (BAK) of Family Services, Inc., is the only emergency domestic violence shelter for women and their children in Montgomery County. BAK is a 60-bed, short-term crisis shelter.¹²⁴ Various other shelters exist for men, women, and families, and Montgomery County also runs an Abused Persons Program, but admission to the latter is by application.¹²⁵

Displacement of Residents Due to Economic Factors

Region

High housing costs and a lack of affordable housing options place significant pressure on longtime District residents. As a result, many residents, particularly low-income residents of color, relocate to the edges of the metropolitan region or relocate out of the region altogether.¹²⁶ The City of Alexandria, Arlington County, the District of Columbia, Fairfax County, Loudoun County, Montgomery County, and Prince William County all have households vulnerable to displacement.

Households earning less than 200 percent of the federal poverty line in Arlington, Loudoun, Fairfax, and Prince William Counties in northern Virginia have the highest rate in the country of spending more than 50 percent of their income on housing.¹²⁷ The high cost of housing was especially burdensome to low- and moderate-income households closer to the District of Columbia.¹²⁸

Increasing financial pressure due to the COVID-19 pandemic has affected many households' ability to pay their rent or mortgages. Eviction moratoriums have delayed many evictions but high housing costs in the region will likely force households to move further away from the region's center.

Alexandria

Business investment in the area around the City of Alexandria, particularly the selection of Arlington as Amazon's second headquarters, "HQ2," has increased housing costs and will make it more difficult for low-income residents to remain. There is particular concern that Amazon will displace residents of the Arlandria-Chirilagua neighborhood, which is one of the last sections in Alexandria that has some market-rate affordable housing.¹²⁹

Arlington County

Similar to the City of Alexandria, Arlington County housing costs are increasing due to economic development and growing income inequality.¹³⁰ Increasing business development, including the construction and opening of Amazon's HQ2, will likely accelerate the displacement of longtime residents.¹³¹ Residents in southern Arlington County, where more than half of residents rent, face higher risk of displacement than residents of northern Arlington County.¹³² Increasing economic inequality, intensified due to the COVID-19 pandemic, make Black and Hispanic renters particularly vulnerable.

District of Columbia

The District of Columbia has high levels of displacement of low-income residents, who are disproportionately likely to be Black,¹³³ due to increasing economic requirements for housing.¹³⁴ A study by the Institute on Metropolitan Opportunity concluded that the District of Columbia had the most widespread displacement of low-income residents of any major city between 2000 and 2016.¹³⁵ In the wake of low-income resident exodus, wealthier households are moving in. This creates a feedback cycle where less affordable housing is created and makes it harder for low-income households to remain in the District. The high cost of housing has collateral effects on other industries. With new, increasingly wealthier residents moving in, the prices for services like child care also increase and place financial pressure on households.¹³⁶

Fairfax County

Fairfax County faces a significant threat of resident displacement in the metropolitan D.C. region.¹³⁷ Housing prices are increasing rapidly. Fairfax County has a large number of established low- and moderate-income households who are likely to face significant increases in housing costs in the future.¹³⁸

Loudoun County

In 2020, 62 percent of Loudoun County households spent more than one-third of their income on housing.¹³⁹ A 2021 draft of Loudoun County's *Unmet Housing Needs Strategic Plan* highlighted that people who work in Loudoun County are unable to afford to live there and are forced to live outside the county.¹⁴⁰ Furthermore, Loudoun County lacks housing options with practical access to transit, forcing households to use roads that are overburdened by workers commuting from adjacent counties.¹⁴¹

Montgomery County

Montgomery County has a lack of housing across all income levels. Although the region faces competition for low- and moderate-income housing, Montgomery County's spiraling housing costs force even middle-income households to move further away from the metropolitan center. Housing prices in the county are 57 percent above the statewide average and 74 percent above neighboring Prince George's County average.¹⁴²

Prince William County

Prince William County faces similar problems to other municipalities in the region. High housing costs and lack of housing stock, particularly low- and moderate-income housing, makes it difficult to live in the county. Furthermore, increasing income inequality drives up the cost of living across the board, forcing even homeowners to consider moving toward more financially viable areas.

Table 40: Impediments to Mobility

Municipality	HCV Waiting List Status	HCV Payment Standard for 2 Bedrooms	HCV Lease-Up Time	Source-of-Income Protection Law
Alexandria	Closed to new applicants ¹	\$1,941 ²	Not locally specified; HUD minimum voucher term is 60 days	Statewide: yes ³ Locally: no
Arlington County	Closed to new applicants; ⁴ average voucher wait is approximately 5 years ⁵	\$1,941	120 days ⁶	Statewide: yes Locally: no
District of Columbia	Closed to new applicants; ⁷ estimated 1–10 years to get to the top of the waiting list ⁸	Based on zip code, ⁹ ranges from \$1,160 to \$2,650 ¹⁰	180 days ¹¹	Yes ¹²

Fairfax County	Closed to new applicants ¹³	\$1,941	60 days with automatic 60-day extension upon request ¹⁴	Statewide: yes Locally: no
Loudoun County	Closed to new applicants ¹⁵	\$1,941	60 days; 30-day extensions are available ¹⁶	Statewide: yes Locally: no
Montgomery County	Open to new applicants ¹⁷	Based on zip code, ranges from \$1,160 to \$2,650 ¹⁸	90 days; extensions up to 60 days are available ¹⁹	Statewide: yes ²⁰ Locally: yes ²¹
Prince William County	Closed to new applicants ²²	\$1,941	60 days; generous extensions available ²³	Statewide: yes Locally: no

- Sources: 1. "Housing Choice Voucher Programs," Alexandria Redevelopment and Housing Authority (website), <https://www.arha.us/housing-choice-voucher-programs-hcvp>.
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The biggest impediment to mobility in the D.C. metropolitan region is the lack of affordable housing available beyond the existing housing system. A range of impediments reduce access to housing. First, the majority of HCV programs have suspended applications for the program through waiting list closures. As a result, individuals in need of affordable housing who are not on the existing waiting list cannot even apply for the program, which limits the expansion of affordable housing stock. Montgomery County is the only municipality with an open waiting list for HCVs. The expected waiting time in markets where the waiting list is closed is either unavailable or is estimated to be several years.

State and local laws in the District and Montgomery County prohibit source-of-income discrimination. Although the District has protected source of income in housing for years, a study in 2018 by the Urban Institute found that 15 percent of District landlords did not accept vouchers.¹⁴³ In response, the D.C. Council strengthened the source-of-income protections,¹⁴⁴ notably requiring landlords to affirm in all advertisements they will not refuse to rent to a person paying through a voucher for rental housing assistance.¹⁴⁵ Maryland enacted source-of-discrimination protection statewide in 2020.¹⁴⁶ However, Montgomery County has had source-of-income protections for far longer. Like Maryland, Virginia's statewide source-of-income protections are recent, taking effect on July 1, 2020.¹⁴⁷ Similar to Maryland's statute, but unlike the Montgomery County ordinance, Virginia's law exempts "small landlords, landlords that own four or fewer units, or when the entity providing the payment for rent takes more than 15 days to approve the lease" from source-of-income protections.¹⁴⁸

All jurisdictions in the region except for Fairfax County use HUD's small area fair market rent calculation for HUD vouchers. By using a zip code-based calculation, these jurisdictions provide increased mobility because the voucher amount is tailored to costs in a more discrete area—instead of using a one-size fits all model—thereby expanding the potential housing stock an individual can access. In contrast, Fairfax County has one payment standard for the entire county, effectively limiting HCV users to the areas of town where rent is below the standard rate.¹⁴⁹

The voucher lease-up time in some jurisdictions also impedes mobility. Once a voucher lease time expires, an individual loses the voucher, and given that the waiting lists are closed for the most part, an expired lease time limit can disqualify otherwise eligible voucher participants from securing affordable housing for many years. In the majority of Virginia's jurisdictions in the region, the public housing agency imposes a lease-up time of 60 days. Although extensions are available, the standard wait time is insufficient to allow residents to find eligible housing because of the extensive housing search necessary (in addition standard employment and family care obligations) and, often, a lack of familiarity with qualifying housing. Landlord prejudice about accepting vouchers, despite the legal protection, as well as the onerous housing application process are also significant barriers that may cause a lease time to expire before an individual can secure housing.

Inaccessible Government Facilities or Services

Inaccessible government facilities or services contribute to disparities in access to opportunity for persons with disabilities. Although a variety of public facilities and services have reasonable accommodation policies for persons with disabilities, many facilities and services require additional outreach or efforts by the person with a disability to request accommodations themselves, usually with several days' notice, rather than having these services consistently embedded into their administration. As a result, individuals with disabilities must be proactive to obtain necessary accommodations.

In the region, some counties provide a range of accessibility services. Montgomery County has an ADA Compliance Team and provides training and technical assistance for county staff on ADA compliance and other disability needs. Similarly, Fairfax County provides ADA services through its government

offices, including enforcing building codes that require ADA compliance and handling ADA complaints. In the District of Columbia, any facility or part of a facility that is constructed by a state or local government entity after January 26, 1992 must be built in strict compliance with the ADA. The District is not necessarily required to make every pre-ADA facility fully compliant with current accessibility codes, however, all District services, programs, or activities must be accessible to and usable by persons with disabilities when viewed in their entirety. This is called “overall program access.”¹⁵⁰ Nonetheless, this loophole means accessibility problems may remain where persons with disabilities face greater barriers in accessing government facilities or services. The same principles apply to other governments in the region.

Web accessibility reveals similar dualities, where governments have attempted to comply with Section 508 referring to website accessibility standards. However, this compliance is only implemented “whenever possible”, and certain elements remain poorly accessible.

Inaccessible Public or Private Infrastructure

Inaccessible public or private infrastructure contributes to disparate access for persons with disabilities in the Washington, D.C. metropolitan area. Although accommodations are available in a range of public and private infrastructure, lack of compliance or maintenance results in inequitable treatment for persons with disabilities. Inadequate maintenance of sidewalks can impede accessibility for persons with mobility-related disabilities, including persons who require wheelchairs for transportation. Recent public efforts, such as the crowdsourced Project Sidewalk, endeavor to map sidewalk accessibility by noting curb ramp conditions, lack of sidewalks, and other common issues impeding mobility in the District.¹⁵¹ Many sidewalks in the D.C. metropolitan area are not up to Americans with Disabilities Act (ADA) standards; in many cases, this is because construction projects have left large cracks that serve as impediments to persons in wheelchairs.¹⁵² The governments of the District of Columbia,¹⁵³ Virginia,¹⁵⁴ and Maryland¹⁵⁵ have all put out ADA Transition Plans for Public Rights-of-Way, which provide a detailed review of sidewalks, crosswalks, bus stops, curb ramps, and accessible pedestrian signals. However, the Transition Plans for the District, published in 2016, and Maryland, published in 2009, have not been updated in quite some time, and inaccessible infrastructure problems persist. Additionally, since COVID-19 has caused restaurants to use more public space for outdoor dining, the pandemic has created new accessibility challenges.¹⁵⁶ Moreover, parking of electric scooters and bicycles has also resulted in impassable sidewalks, particularly in downtown D.C.

Lack of Access to Opportunity Due to High Housing Costs

The extent to which high housing costs contribute to a lack of access to opportunity is a serious concern throughout the region. Median home values vary depending on location. The median home value in Prince William County is approximately \$450,000,¹⁵⁷ whereas the median home value in Arlington is almost \$800,000.¹⁵⁸ Home values dramatically increased this past year across the board. Home values have increased the least in the District, by over 3 percent,¹⁵⁹ and the most in Prince William County, by almost 12 percent.¹⁶⁰

While home values vary depending on location, low-income households throughout the region are burdened by the cost of housing. According to a study from the Community Foundation for Northern Virginia, when compared to the 50 largest metro areas, northern Virginia has the highest percentage of low-income households who are severely burdened by the cost of housing. Northern Virginia also has the sixth-highest rate of housing burden among moderate-income households. Racial and ethnic minorities face severe housing burdens at higher rates: 57 percent of severely burdened households were non-White, and 47 percent were immigrants.¹⁶¹ In addition, non-family households have the

highest cost burden throughout the region compared with family households. Consequently, individuals with disabilities that live alone, and who are likely to live on a fixed income like SSI, are likely to face more barriers to opportunity due to high housing costs.

In the District, nearly 60 percent of households rented housing in 2018. Of those households, one in four spent over 50 percent of their income on rent, and another one-fifth spent between 31 and 50 percent of their income on rent. People of color are also more likely to face housing cost burdens in the District; 30 percent of Black renters spend over half their income on rent.¹⁶² Similarly, in Montgomery County, 50 percent of renters spend more than 30 percent of their income on housing, and a quarter of renters spend over 50 percent of their income.¹⁶³ Since there is such a shortage of affordable housing throughout the region, low-income workers may need to live farther away from employers and transportation. For workers who are disabled, transit distances are likely to impede job access as well.

Lack of Affordable In-Home or Community-Based Supportive Services

District of Columbia

D.C.'s Department of Behavioral Health (DBH) maintains a list of over 30 DBH-certified in-home and community-based providers of supportive services, many of which also provide services to children and youth.¹⁶⁴ Though these services vary in their affordability and accessibility, they are located throughout the city (there is only one in southwest D.C., but the rest are not concentrated in any one of the other three quadrants). The D.C. Department on Disability Services also funds some supportive services.¹⁶⁵ Though supply still fails to meet demand when it comes to affordable supportive services in the District, the framework for adequate supportive services nonetheless exists.

Virginia

Virginia Housing and Supportive Services, a community engagement initiative of the Virginia government that serves northern Virginia, maintains a database of programs and resources for individuals with developmental disabilities and others who may benefit from such services.¹⁶⁶ These include programs that assist with accessibility modifications, emergency rent, financial counseling, food, and other potential needs. These services are currently used by over 700 people in the region with developmental disabilities who live independently.

Maryland

The Montgomery County government provides personal assistance, medical assistance, and other supportive services to individuals who meet the county's medical level of care.¹⁶⁷ Such individuals must also qualify for Medicaid. The county does not provide access to or information about more general services. Nonprofit groups serving the rest of the region fill some of these gaps, but Montgomery County remains an area of need with regards to supportive services.

Lack of Affordable, Integrated Housing for People Who Need Supportive Services

Region

The lack of affordable, integrated housing for people who need supportive services is a significant contributing factor to segregation, homelessness, and inadequate housing for persons with disabilities in the D.C. metropolitan area. Although the municipalities have prioritized integrated housing for people who need supportive services, the high housing costs and the lack of affordable housing, in general, limit the effectiveness of targeted programs.

Table 41: Population, Supportive Housing, and Rental Housing Characteristics

Municipality	2019 Census Population Estimate	Permanent Supportive Housing Year-Round Beds ¹	Total Rental Units	Rental Units with 30% or More of Household Income as Gross Rent	Rental Vacancy Rates	Median Gross Rent
Alexandria ²	159,428	47	38,804	15,084 (38.9%)	4.2%	\$1,781
Arlington County ³	236,842	278	61,245	23,144 (37.8%)	3.3%	\$1,993
District of Columbia ⁴	705,749	9,958	162,199	69,304 (42.7%)	7.0%	\$1,603
Fairfax County ⁵	1,147,532	627	126,768	57,431 (45.3%)	2.6%	\$1,900
Loudoun County ⁶	413,538	24	28,713	11,617 (40.4%)	7.1%	\$1,876
Montgomery County ⁷	1,050,688	2,155	125,266	63,923 (51.0%)	4.9%	\$1,788

Sources: 1. Data provided by HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report for each region, <https://www.hudexchange.info/programs/coc/coc-housing-inventory-count-reports/>.

2. American Community Survey, ACS Data Table DP04, Selected Housing Characteristics, Alexandria City: 2019 ACS 1-Year Estimates Data Profiles, US Census Bureau, <https://data.census.gov/cedsci/table?q=housing%20affordability%20alexandria%20city%20va&tid=ACSDP1Y2019.DP04&hidePreview=false>.

3. American Community Survey, ACS Data Table DP04, Selected Housing Characteristics, Arlington County: 2019 ACS 1-Year Estimates Data Profiles, US Census Bureau, <https://data.census.gov/cedsci/table?q=housing%20affordability%20arlington%20county%20va&tid=ACSDP1Y2019.DP04&hidePreview=false>.

4. American Community Survey, ACS Data Table DP04, Selected Housing Characteristics, District of Columbia: 2019 ACS 1-Year Estimates Data Profiles, US Census Bureau, <https://data.census.gov/cedsci/table?q=housing%20affordability%20district%20of%20columbia&tid=ACSDP1Y2019.DP04&hidePreview=false>.

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Alexandria

The City of Alexandria acknowledges that there is a lack of supportive housing and aims to increase affordable housing and supportive housing through its efforts to end homelessness.¹⁶⁸

Arlington County

Arlington County has increased its capacity to support individuals needing permanent supportive housing, but many applicants remain on the waiting list for services for more than one year.¹⁶⁹

District of Columbia

The District of Columbia prioritizes funding permanent supportive housing to address homelessness.¹⁷⁰ HUD's Continuum of Care *Housing Inventory Count Report* indicated that the District of Columbia provides the highest number of supportive housing beds per capita in the region. Although the District is a leader in the region, there is still an overall lack of supportive housing.

Fairfax County

Fairfax County acknowledges the need to create more affordable and supportive housing, and there is a waiting list.¹⁷¹ However, short-term plans to supportive housing stock are seemingly modest.¹⁷²

Loudoun County

Loudoun County has the fewest number of permanent supportive housing beds per capita in the region, according to HUD's Continuum of Care *Housing Inventory Count Report*.¹⁷³ The county acknowledges that it needs increased capacity to provide permanent supportive housing, homelessness prevention, and intensive case management.¹⁷⁴

Montgomery County

Montgomery County's Interagency Commission on Homelessness (ICH) prioritizes creating housing and services for homeless persons, including emergency and transitional shelter, rapid rehousing, and permanent supportive housing.¹⁷⁵ ICH, which began in 2015, has worked with the county to revise its structure to deliver supportive housing.¹⁷⁶ The ICH's 2020 annual report acknowledges that the lack of affordable housing for families at or below 30 percent of the AMI and lack of supportive housing services hurt their overall effort.¹⁷⁷

Lack of Affordable, Accessible Housing in a Range of Unit Sizes

HUD's implementation of Section 504 of the Rehabilitation Act of 1973 (24 CFR Part 8) requires that publicly supported federal housing developments make 5 percent of total units accessible to individuals with mobility disabilities and an additional 2 percent of total units accessible to individuals with sensory disabilities. Public housing and project-based Section 8 units are both considered to be publicly supported housing subject to this mandate. Based on these requirements, every jurisdiction except for Gaithersburg, Maryland, meets the above legal criteria.

As discussed in Location and Type of Affordable Housing (see page XX), affordable housing in the region is available in a range of unit sizes. These include accessible housing options such as assisted living facilities, independent living units, and congregate care facilities. However, the supply of affordable, accessible housing continues to fall well short of demand in the D.C. area, as a report by the D.C. Affordable Housing Alliance makes clear.¹⁷⁸ Virginia and Maryland also acknowledge the mismatch between the supply of affordable accessible housing and the growing need for such housing.¹⁷⁹ Despite a range of sizes, disparities in unit size allocations produce disparities in access to affordable accessible housing. As discussed in depth in the Disparities in Housing Needs section, there is a disproportionately lower percentage of publicly supported housing for larger families, meaning individuals with disabilities who live with their families are less likely to have access to affordable housing. Additionally, there appears to be an outsized proportion of housing stock reserved for one-bedroom units, which also limits access to affordable and accessible housing because in some circumstances a resident may need a live-in attendant but cannot due to occupancy limits. Additionally, many individuals with disabilities live on a fixed income. Those who rely on SSI as their primary income and live alone are unable to afford most units due to their significantly limited income. Further development of accessible affordable housing units is needed to ensure availability to a larger proportion of those who need it.

Lack of Assistance for Housing Accessibility Modifications

In the District of Columbia, the Single-Family Residential Rehabilitation Program (SFRRP) administers grants for modification to eliminate barriers to accessibility for persons with disabilities.¹⁸⁰ The District's public housing program also prioritizes persons with disabilities and allows for reasonable accommodations for those with disabilities.¹⁸¹ Rebuilding Together Arlington/Fairfax/Falls Church provides home repair services to make homes accessible at no cost to persons with disabilities. The Housing Modifications for the Disabled and Elderly Program assists low-income individuals and families with housing modifications to their home to allow for greater mobility.¹⁸² The City of Alexandria's Rental Accessibility Modification Program (RAMP) provides grant funds to modify rental housing to make the units more accessible for low- and moderate-income tenants with physical disabilities.¹⁸³ In Maryland, much of this work is done by a group of nonprofits known as the Centers for Independent Living, but these organizations do not provide explicit support for housing accessibility modifications, nor does the government of Montgomery County appear to do so.

In general, housing accessibility and accessibility modifications remain a major concern, including in discriminatory renting. A 2019 report revealed that housing in the D.C. region is frequently inaccessible and that affordable housing programs frequently steer persons with disabilities toward already modified housing, which is a violation of the Fair Housing Act.¹⁸⁴

Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing

Lack of assistance for transitioning from institutional settings to integrated housing is a slight contributing factor to the segregation of persons with disabilities in D.C. and the broader region. In the past decade, Maryland and Virginia have significantly reduced the proportion of individuals with disabilities who live in institutional settings, but this alone does not prove that any provided assistance to transitioning to integrated housing has been successful. Stakeholders indicated that transition services for persons with psychiatric disabilities lag behind those available for persons with intellectual and developmental disabilities, with less stable housing tenure in integrated settings being the result. Additionally, there is a large population of individuals with psychiatric disabilities living in group homes, including some large group homes, that may not meet the regulatory definition for an institution but in practice are virtually the same.

There is a need to have more proactive case management with respect to individuals living in group homes that informs them of more integrated housing opportunities. In the broader region, although the Commonwealth of Virginia has increased the transition services offered to persons with intellectual and developmental disabilities, such services for persons with psychiatric disabilities are not as adequate.

Nevertheless, there are several agencies in the region who work with clients to assist with this transition. In the District, the main organization that assists with transitions from institutional settings to integrated housing is Pathways to Housing D.C., which has helped over 900 people move into its permanent housing program since 2004.¹⁸⁵ Pathways to Housing D.C. works exclusively with those who are overcoming mental illness, substance abuse, or severe health challenges. Given that Pathways to Housing D.C. is the only organization primarily dedicated to providing assistance in the transition to integrated housing in the District, there is room for expansion in this field.

Virginia Housing and Supportive Services has also worked to increase access to information about transitioning to integrated housing, though it does not run its own programs, but rather contracts with

community partners to facilitate transitions.¹⁸⁶ No Wrong Door is its primary program to expand access to integrated settings but it predominantly does so by connecting individuals with private entities.¹⁸⁷

In Maryland, the Maryland Developmental Disabilities Administration assists with similar services and has an online portal, Maryland Access Point, where people can identify available resources in their area.¹⁸⁸ Virginia and Maryland provide a range of Medicaid waivers for individuals with disabilities to assist them with the transition to integrated housing, However, in Maryland, wait times for these services are considerably long, taking more than a year in most cases.¹⁸⁹ Nonetheless, in this past year, Maryland increased its waiver rates, which indicates that service providers may be able to expand and improve the overall services reduce wait times.¹⁹⁰

Lack of Community Revitalization Strategies

All of the jurisdictions within the Washington, D.C. metropolitan region dedicate significant time and funds to community revitalization. All make use of the federal government's Opportunity Zone program to incentivize developers to build within economically disadvantaged neighborhoods. In addition to this federal initiative, they have also instituted a variety of other programs as well.

Virginia has a variety of community revitalization strategies and jurisdiction-based strategies that promote community revitalization. Prince William County offers financial assistance to households to improve owner-occupied housing and increase energy efficiency, with priority given to households making below 50 percent of the AMI.¹⁹¹ Loudoun County offers a similar program.¹⁹² Arlington County offers community development grants to community groups to improve the quality of life for low-income residents.¹⁹³ There is also the Eligible Areas Small Grants Program, which provides small grants for community activities.¹⁹⁴ In 2020, Loudoun County designated an area of land outside Leesburg as a Virginia Housing Development Authority revitalization area.¹⁹⁵ Fairfax County created the Economic Incentive Program to encourage redevelopment in certain areas.¹⁹⁶

Maryland has also developed a host of programs to advance community revitalization. Under its Sustainable Community Act, the state provides funding to designated localities to invest in community development activities, including local economic development, historic landmark preservation, affordable and sustainable housing development, and growth and development practices that target the improvement of the natural and built environment.¹⁹⁷ One important initiative to achieve this goal is the Community Legacy Program, which provides funding to local governments, community groups, and groups of local governments to support the following:

- mixed-use development consisting of residential, commercial and/or open space
- business retention, expansion, and attraction initiatives
- streetscape improvements
- increased homeownership and home rehabilitation among residents
- residential and commercial facade improvement programs
- real estate acquisition, including land banking, and strategic demolition¹⁹⁸

Montgomery County is designated as an eligible recipient for these funds and has developed several initiatives to implement this program. Montgomery County offers a Focused Neighborhood Assistance program for public land improvement, home improvement, commercial property improvement, neighborhood cleanup, murals, and community events.¹⁹⁹

Lack of Local Private Fair Housing Outreach and Enforcement

Lack of local private fair housing outreach and enforcement is not a contributing factor to the segregation and various kinds of fair housing issues in the District of Columbia's metropolitan region. There are more than 30 private organizations across the metropolitan region that offer legal advice and representation to low-income individuals experiencing housing issues, with several organizations restricting their clientele to low-income seniors and other special populations. The Equal Rights Center (ERC), Maryland Legal Aid, Legal Services of Northern Virginia, Greater Washington Urban League, and Northern Virginia Urban League are among the private organizations offering housing outreach and enforcement services to residents in the larger metropolitan region.

In the District, there is an even more robust network of private organizations offering fair housing legal aid services. Organizations like Bread for the City, Legal Counsel for the Elderly, Legal Aid, Neighborhood Legal Services Program, and D.C. Bar Pro Bono Center offer legal services to low-income residents experiencing fair housing issues in the District, with several organizations forming partnerships to coordinate and bolster the fair housing services they offer individuals. These partnerships include the D.C. Right to Housing Initiative, Housing Right to Counsel, and Landlord-Tenant Court-Based Legal Services Project.²⁰⁰

Nevertheless, there is still a need for private fair housing outreach and enforcement services to be expanded in the area, particularly for metropolitan residents who have disabilities. The Disability Rights D.C. program at University Legal Services offers legal services to District residents with disabilities and many of the organizations listed above routinely offer legal services to low-income disabled residents who come to them with fair housing needs.²⁰¹ Yet, it can be difficult for individuals with disabilities that are not income eligible to acquire legal representation or advice regarding their reasonable accommodation. Therefore, people who do not qualify for low-income legal aid but nonetheless require legal services to resolve housing issues may find it difficult to obtain these services within the District and wider metropolitan region.

Lack of Local Public Fair Housing Outreach and Enforcement

Lack of transparency into local public fair housing outreach and policy enforcement is a significant impediment to fair housing in the region. For the most part, Virginia provides educational materials regarding fair housing rights targeting both housing seekers and partners like real estate agencies. This includes information on changes to the state fair housing laws regarding the expanded protected classes and new source-of-income discrimination protections. Virginia does not provide public information on the amount or type of fair housing complaints electronically so it is difficult to assess the quality of enforcement mechanisms. When it comes to fair housing testing, residents rely on nonprofits to investigate fair housing violations because public fair housing agencies typically don't provide testing services.

There is also a lack of local enforcement activities as well as limited resources. Three local municipalities—the District of Columbia, Fairfax County, and Montgomery County—have locally certified substantially equivalent agencies that are eligible to investigate fair housing complaints under their jurisdiction.²⁰² Other municipalities have complaints in their regions made directly to HUD or the state's subagency in charge of enforcing the Fair Housing Act. As a result, it is difficult to determine the total number of public fair housing complaints and resolutions in the region due to the fragmented enforcement mechanisms available and the lack of transparency related to fair housing complaint information. Additionally, Virginia has recently reduced the number of attorneys in the state's Office of Civil Rights who are charged with investigating fair housing complaints.

Lack of Meaningful Language Access for Individuals with Limited English Proficiency

A lack of meaningful language access for individuals with LEP is a contributing factor to unequal access to opportunity in the District of Columbia's metropolitan region.

District of Columbia

While the D.C. Language Access Act of 2004 requires all District government agencies, public-facing contractors, and grantees to ensure that limited and non-English proficient (LEP/NEP) individuals have access to the full range of government services, studies show that the city's housing organizations provide insufficient translation and interpretation services to LEP/NEP individuals. In fact, the District's inadequate access to translation and interpretation services is widely known among proponents of equal language access. Advocacy groups like the D.C. Language Access Coalition²⁰³ and the Council for Court Excellence²⁰⁴ have frequently pointed out the insufficiency of meaningful language access for LEP/NEP individuals in the District, especially with regard to the city's housing agencies and rental assistance programs.

The D.C. Office of Human Rights' (OHR) Language Access Program monitors and evaluates all 38 covered entities each year. The District's housing-related agencies are designated as Covered Entities with Major Public Contact under this Act.

The OHR's latest report revealed the D.C. Housing Authority to have one of the lowest interpretation rates among D.C. agencies, with interpretation services being provided to only 31 percent of the test calls and visits.²⁰⁵ The Housing Authority scored a 31 percent on the OHR evaluation of the organization's compliance with the Language Access Program, one of the lowest scores.²⁰⁶ In 2019, the D.C. Housing Authority faced two inquiries alleging that they had violated the Language Access Act.

The most frequently encountered languages for these agencies were Spanish, Amharic, Vietnamese, Mandarin, Arabic, French, and Korean.²⁰⁷

Virginia

Arlington County requires all county departments to provide interpretation and translation services to residents with LEP. In fact, the Arlington County HCV program is specifically required to offer LEP residents oral interpretation and written translation services free of charge.²⁰⁸ Housing information that is available on the county's website is almost always written on the web page itself, therefore allowing the materials to be translated by the page-translating service that is located at the top of the web page.

In Fairfax County, more than a third of residents speak a language other than English at home. However, while the county utilizes interpreters from Language Line Services in order to provide language services to those calling 911, the county does not seem to require their departments to offer translation and interpretation services to non-English speakers seeking help with housing issues.²⁰⁹ The county's website provides several housing resources that are only available in English. The *Fairfax County Affordable Housing Guide* and "Family Self-Sufficiency Interest Form,"²¹⁰ for instance, are both only available in PDF form, making it difficult to translate with an automatic web service. The county does, however, allow for their web pages to be translated by Google Translate and videos regarding the Covid-19 Emergency Rental Assistance Program were filmed in both English and Spanish.²¹¹

Slightly more than one-third of all Alexandria residents speak a language other than English at home.²¹² However, despite hosting the April 2022 Virginia Language Access Conference, Alexandria does not appear to abide by any long-term language access programs itself. If language access is provided to residents, translation and interpretation services are limited primarily to Spanish-speaking

LEP individuals. For instance, the City of Alexandria’s Office of Housing provides special assistance to Spanish speakers seeking housing-related mediation.²¹³ The Alexandria Redevelopment and Housing Authority (ARHA) offers interpretation and translation services to Spanish-speaking LEP individuals as well, recommending that someone bring an interpreter to their office so that they can complete Section 8 applications with ARHA’s aid.²¹⁴ This is an issue, as an estimated 19.1 percent of all Alexandria residents speak neither English nor Spanish at home.²¹⁵ Nevertheless, it should be noted that both the websites of the City of Alexandria and ARHA can be translated into any other language via Google Translate, and both websites do a relatively good job of ensuring that PDFs are available in a variety of languages if they are published on the web page. Alexandria’s 2021 Housing Guide, for instance, is available in English, Spanish, Arabic, Urdu, and Amharic.²¹⁶

In Loudoun County, 31.5 percent of the county’s residents speak a language other than English at home, and 9.8 percent speak English “less than very well.” Contrary to other county governments in the D.C. metropolitan region, however, Loudoun County does have in place a long-term language access policy that requires its departments and personnel to take “reasonable steps to provide LEP persons with timely and meaningful access to services and benefits.” Specifically, Loudoun County provides translation and interpretation services to residents who speak Spanish, Arabic, Farsi, Urdu, Mandarin, Cantonese, Korean, Vietnamese, French, Hindi, Turkish, and Somali via foreign language phone interpretation, face-to-face interpretation, and written translation contract vendors. In 2020 alone, the county provided interpretation services to over 10,000 phone calls, of which 80 percent were from Spanish-speaking residents.²¹⁷ Loudoun County’s website can also be translated by a Google Translate button that is located in the bottom right corner of each page. The vast majority of resources on housing are located on the web page itself and can thus be translated by the Google Translate tool, though several resources are only available in English on a PDF. These resources—the ADU Self-Screening Questionnaire and the document “Financial Education and Credit Counseling Resources,”²¹⁸ for example—cannot be translated by the Google Translate tool, thus making it difficult for LEP residents to access these resources.²¹⁹

Maryland

Like Loudoun County, Montgomery County offers LEP residents written translation and oral interpretation services to help them communicate with county staff members. When present in person, a resident is able to select the language they primarily speak on a Language ID Board so that they can receive interpretation services. These services may be provided by someone who is a part of a database of bilingual county employees or the Language Bank, a searchable online database made up of community volunteers.²²⁰ On Montgomery County’s website, an archive of all translated resources are found in a single place, making it easy for LEP individuals to find the information they both need and understand. Notably, however, the housing resources were available primarily in English and Spanish.²²¹

Lack of Private Investment in Specific Neighborhoods

Alexandria

Alexandria provides a list of affordable housing projects that are proposed or recently completed, as well as a list of market-rate projects that will contain affordable housing units. Current nonprofit affordable housing projects include The Lineage, which will redevelop 15 public housing units into a four-story building that will include 15 replacement units for households that earn up to 30 percent of the AMI, and 37 units for those that earn up to 50 percent and 60 percent of the AMI. There are also two other projects that will serve those earning between 40 and 60 percent of the AMI. None of the market-rate projects provide for more than a handful of affordable units. One project will provide for 4 affordable units in a 370-unit mixed-use development. Rather than provide more units, the developer appears to have elected to provide a contribution of \$1 million to the city’s housing trust fund.²²²

There has been a good amount of development in the Opportunity Zones within Alexandria.²²³ The Alexandria Housing Development Corp. is asking for a loan to start work on a project that will result in hundreds of affordable units in Arlandria. As many as 530 units could be constructed.²²⁴ In Arlandria, the poverty rate is over 15 percent and more than 10 percent of households experience overcrowding.²²⁵

There are also several new developments in Alexandria West, including a townhouse development starting at \$800,000. Several office buildings in the area are being converted into multifamily residential units. In another development, 24 units of garden-style apartments will be torn down and replaced with a 383-unit building.²²⁶ The project was approved over the objections of two council members, who were concerned about the relatively low number of affordable units within the building.²²⁷

Arlington County

This past year, Arlington County approved a 77-unit affordable housing project in the Columbia Pike Corridor. Construction also started on a 160-unit building with 6,750 square feet of other space on Washington Boulevard. Another affordable housing complex on South Glebe Road was completed.²²⁸

The Columbia Pike Corridor is the location of one of the designated Opportunity Zones within Arlington County.²²⁹ Certain tracts within the corridor are also listed as disadvantaged by the Northern Virginia Health Foundation.²³⁰ Although not far from Columbia Pike, there appears to be little to no recent development within Douglass Park, another distressed area within Arlington County.

District of Columbia

There are 25 census tracts considered Opportunity Zones within the District, most of which are in Wards 7 and 8. Opportunity Zone investments offer a federal tax incentive, but District taxpayers can also realize District-level tax benefits for certain qualifying investments approved by the mayor.²³¹ There are currently 15 such investments. There are several mixed-use housing developments listed as qualifying investments, as well as urban farms, a brewery, and a commercial development in downtown Anacostia that will provide over 34,000 square feet of retail space, among others.²³²

Fairfax County

The Opportunity Zones in Fairfax County are located in Herndon and Reston, as well as the area around Groveton and Mount Vernon Woods.²³³ However, according to a study from the Northern Virginia Health Foundation, there are some isolated, economically distressed census tracts in several other locations in Fairfax County. These tracts can be found in Centreville and Chantilly, Fair Oaks and Oakton, Springfield and Annandale, and Seven Corners and Bailey's Crossroads.²³⁴

There appear to be a few new mixed-use developments in Herndon. However, none of these appear to be within the Opportunity Zone.²³⁵ There are several proposed mixed-use developments in Reston, including the redevelopment of the Lake Anne Fellowship House, which provides affordable housing for seniors. However, the new development will merely replace existing housing, not add to the number of units.

There is also discussion about converting Fair Oaks Mall into a mixed-use development with over 2,000 units. However, while a new transit center is being constructed near the mall, the existing roadways are not conducive to biking and walking.²³⁶ This seems to be a trend in the county, as the Springfield Mall is being converted into a mixed-use development, but the need for a pedestrian-friendly experience to reach the mall from the Metro station has also interfered with plans.²³⁷

Fairfax County has also launched an economic incentive program to spur development in several “commercial revitalization districts.” These districts include parts of Springfield, Annandale, Bailey’s Crossroads and Seven Corners, and Richmond Highway, which includes Groveton. The county will offer a 10-year real estate tax abatement for new commercial, industrial, or multifamily residential developments located within these areas.²³⁸

Gaithersburg

There are a number of new commercial and residential developments planned in Gaithersburg, including the proposed Stevenson-Metgrove mixed residential community, and the Novavax Campus, containing over 600,000 square feet of offices, light manufacturing, and open space.

Loudoun County

The Loudoun County Department of Economic Development has extensive information for developers on its website encouraging them to develop a project in an Opportunity Zone.²³⁹ The two Opportunity Zones in Loudoun county are located in Oak Grove and Sterling.²⁴⁰ Loudoun County has a list of recently constructed mixed-use developments, four of which are near Oak Grove and along Phase 2 of the Silver line Metro extension. There are several other mixed-use developments in and around Sterling, most notably Dulles Town Center.²⁴¹

However, one area, Leesburg, is not classified as an Opportunity Zone. In that area, there are census tracts where more than 10 percent of households experience overcrowding. More than 25 percent are uninsured. In one tract in Leesburg, only 56 percent of adults graduated high school. By comparison, 92 percent of adults age 25 and older in northern Virginia graduated high school. ²⁴² Over 2 million square feet of office, retail, and commercial space is under development in the town.²⁴³ While some of the proposed uses include mixed-use developments, others are fast-food restaurants and storage units.²⁴⁴

Montgomery County

There are 13 Opportunity Zones in Montgomery County.²⁴⁵ In the Opportunity Zones around Germantown and Gaithersburg, one development proposed in the past few years is a 137-unit residential building.²⁴⁶ It appears to be designed for students, given its proximity to the Germantown Campus of Montgomery College and that the application name for the development is called College View Campus.²⁴⁷ There was also a proposal for a development with 450 townhomes, 32 single-family detached homes, and 6 duplex units²⁴⁸ and for a development with 49 townhomes, a four-story apartment building with 72 units, and retail space.²⁴⁹

Prince William County

There are six Opportunity Zones within Prince William County, most of which are near the border of Fairfax County along I-95.²⁵⁰ The Northern Virginia Health Foundation identifies not only those areas as disadvantaged, but also three census tracts in Dumfries.²⁵¹ Riverside Station, a large mixed-use development containing 930 multifamily residential units and 145,000 square feet of retail, is planned for North Woodbridge across from the Woodbridge Virginia Railway Express station.²⁵²

Lack of Public Investment in Specific Neighborhoods

District of Columbia

The Tax Cuts and Jobs Act of 2017 implemented Opportunity Zones in the District.²⁵³ Opportunity Zones are designated zones in a federal program that provides tax incentives for investments in new businesses and commercial projects in low-income communities. Currently, 25 census tracts in the District are designated as Opportunity Zones, with the majority located in Wards 7 and 8. The Office of the Deputy Mayor for Planning and Economic Development also maintains a map and list of its own

projects, affordable housing projects, industrial revenue bond projects, vacant properties, and Great Streets awardees and corridors.²⁵⁴ The majority of these public investment projects are located in Wards 4–8, with Ward 8 containing the highest number, followed by Ward 6. There are currently 112 projects listed in the database, including projects in development, under construction, and completed since 2011.

Virginia

In recent years, northern Virginia has seen a rise in private investment, including well-known projects such as the second Amazon headquarters in Arlington. Nonetheless, the region has seen an uptick in public investment in transportation infrastructure in recent years. For example, in 2020, the Northern Virginia Transportation Authority pledged over \$500 million in funding for 21 projects throughout the region.²⁵⁵ City and county governments have each undertaken public projects within their jurisdictions. However, these projects do not match the scale of projects in D.C., nor do they take a similarly pointed approach to neighborhoods with a particular need for such investments.

Maryland

The Montgomery County government maintains a list and map of economic development projects that receive public funding.²⁵⁶ The map currently contains nine projects, which include transportation, residential development, a science research complex, and a hotel project. These are concentrated in the southeastern part of the county, especially around Bethesda and Silver Spring. All are located in Districts 1, 3, 4, and/or 5. District 2 and the western portion of District 1, which encompass the western and northwestern portions of the county, receive minimal amounts of public investment.

Lack of Regional and Local Cooperation

Lack of regional and local cooperation is not a contributing factor to fair housing issues in the District of Columbia’s metropolitan region. The metropolitan region’s primary cooperative body is the Metropolitan Washington Council of Governments (COG), which is composed of more than 300 elected officials from 24 local governments, the Maryland and Virginia legislatures, and U.S. Congress. Since the COG established the need for accessible and affordable housing in its 2010 regional plan,²⁵⁷ members of the COG have recognized the centrality of fair and affordable housing issues in securing a vibrant and equitable future for the metropolitan area. In September 2019, the COG Board of Directors adopted the Regional Housing Initiative. The initiative establishes three regional housing targets that are intended to “address the region’s housing needs from an economic competitiveness and transportation infrastructure standpoint.” Specifically, as part of this Regional Housing Initiative, the COG aspires to work alongside nonprofit, private, and philanthropic partners to create an additional 320,000 housing units, with three-quarters of all new housing affordable to low- and middle-income families and in activity centers or near high-capacity transit.²⁵⁸ The COG also established a committee dedicated to helping local jurisdictions meet fair housing requirements. This Regional Fair Housing project team meets monthly and is composed of a core group of jurisdictions and their Public Housing Authority partners.²⁵⁹

Lack of Resources for Fair Housing Agencies and Organizations

Lack of resources for fair housing agencies and organizations is a moderate contributing factor to the housing issues in the region. Multiple fair housing agencies and organizations in the metropolitan region receive or have received Fair Housing Initiatives Program (FHIP) funds from HUD, including the ERC, National Coalition for Asian Pacific American Community Development, National Community Reinvestment Coalition, and the National Fair Housing Alliance.²⁶⁰ Community Development Block Grants (CDBGs) also provide funding to fair housing organizations across the metropolitan region. It is important to note, however, that each of the organizations that have recently received FHIP funds are

based in the District and thus primarily work within the city—not the larger metropolitan region—to help residents resolve housing issues. In fact, the ERC was the only private fair housing organization of those that received FHIP funds in 2020 that was dedicated to serving the housing needs of the greater Washington, D.C. region.²⁶¹ Resources for fair housing organizations are thus concentrated within the District itself, with fewer resources being allocated to the larger metropolitan region.

It should also be noted that many organizations that provide fair housing services to the District's residents are not devoted solely to remedying fair housing issues in the region. Many organizations, including the ERC, Maryland Legal Aid, Legal Services of Northern Virginia, and the D.C. Bar Pro Bono Center, have broad missions, with specific projects devoted to alleviating specific housing issues in their region. Therefore, these organization's resources are often divided among a variety of projects. For instance, the D.C. Office of Human Rights, the body tasked with investigating claims of housing discrimination in the District, has also been reported to lack sufficient resources to properly handle claims and investigate cases.²⁶²

Lack of State or Local Fair Housing Laws

Lack of state or local fair housing laws is not a significant contributing factor. The D.C. Human Rights Act protects against housing discrimination based on a variety of traits, including race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial responsibilities, political affiliation, disability, matriculation, familial status, source of income, place of residence or business, and status as a victim of an intrafamily offense.²⁶³ While not as broad as the District's, Virginia and Maryland's fair housing laws also prohibit discrimination based on several traits. In Virginia, it is illegal to discriminate in housing on the basis of race, color, religion, national origin, sex, elderliness, familial status, disability, source of funds, sexual orientation, gender identity, and veteran status.²⁶⁴ Maryland similarly prohibits discrimination on the basis of race, color, religion, sex, familial status, national origin, marital status, sexual orientation, gender identity, disability, or source of income.²⁶⁵

Montgomery County expands on Maryland's law by prohibiting discrimination on the basis of ancestry, presence of children, family responsibilities, and age.²⁶⁶ Arlington County differs slightly from Virginia law in that it protects both marital status and familial status, and makes sure to clearly specify both physical and mental disabilities are protected.²⁶⁷ Alexandria likewise considers marital and familial status, as well as age and transgender status, to be protected traits.²⁶⁸ Prince William County also prohibits discrimination based on both marital and familial status, as well as age in addition to elderliness.²⁶⁹

The Loudoun County website appears to not have been updated since the changes to Virginia's Fair Housing Law prohibiting discrimination on the basis of sexual orientation and gender identity. It merely states that Virginia law prohibits discrimination on the basis of race, color, religion, national origin, sex, elderly age, familial status, and disability.²⁷⁰

Land Use and Zoning Laws

Land use and zoning laws play a significant role in a variety of fair housing issues. Specifically, overly restrictive zoning that suppresses the production of affordable housing in particular and housing more generally leads to disproportionately high rates of housing cost burden and overcrowding for some racial and ethnic groups as well as for persons with disabilities. Additionally, more restrictive zoning in communities that are predominantly White and have disproportionately higher income levels compared with other parts of their respective cities or regions can exacerbate patterns of residential racial segregation. Conversely, inadequate zoning and land use controls to buffer low-income

communities of color from heavily polluting industrial land uses can contribute to racial disparities in health outcomes. An analysis of the fair housing ramifications of land use and zoning laws in each of the participating jurisdictions follows.

Region

The majority of the land in the District of Columbia is developed.²⁷¹ Arlington County, the City of Alexandria, and Fairfax County have similar land development profiles as the District of Columbia.²⁷² Montgomery County contains the highest percentage of undeveloped land in the region.²⁷³

Alexandria

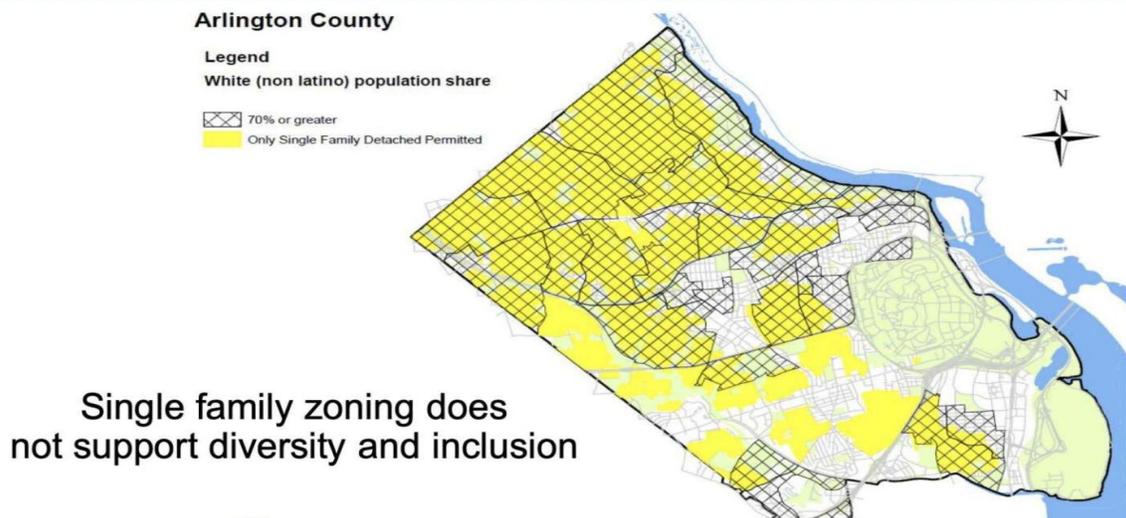
The City of Alexandria has a large amount of single-family housing.²⁷⁴ The high number of historic areas in the city make it difficult to build multifamily housing.²⁷⁵ As a result, affordable housing is only viable on the edges of the municipality.²⁷⁶ The Alexandria City Council approved accessory dwelling units (ADUs) in 2021.²⁷⁷

Arlington County

Arlington County is currently undertaking a study to address the “missing middle”:²⁷⁸ the lack of multiunit housing that fits between single-family housing and large residential developments.²⁷⁹ Arlington County’s zoning laws heavily favor single-family housing and have impeded the creation of multiunit affordable housing.

Map 86: Impacts of the Housing Gap

Impacts of the Housing Gap



Source: Angela Woolsey, “Arlington Missing Middle Housing Study Sets October Kick-Off,” *ARLnow*, September 29, 2020, <https://www.arlnow.com/2020/09/29/arlington-missing-middle-housing-study-sets-october-kick-off/>.

Between 2010 and 2018, Arlington County added significant housing stock that contained 20 or more units and had modest increases in single-detached and single-attached housing and housing with 2–4 units.²⁸⁰ However, Arlington County lost housing stock that contained 5–19 units.²⁸¹

District of Columbia

Affordable housing is unevenly distributed in the District. Ward 8 has significantly more affordable housing than other wards. In contrast, Wards 2 and 3 have significantly less affordable housing than other wards. Single-family homes account for 80 percent of residential buildings in the District.²⁸²

Table 42: D.C. Affordable Housing by Ward

Ward	2019 Median Household Income	2018–2019 Households Below the Poverty Line%	Total Affordable Housing Units	Affordable Housing Units at 0%–30% of AMI	Affordable Housing Units at 31%–50% of AMI	Affordable Housing Units at 51%–60% of AMI	Affordable Housing Units at 61%–80% of AMI	Affordable Housing Units above 81% of AMI
Ward 1	\$94,810	9.5%	1,530	486	347	445	252	0
Ward 2	\$128,670	7.6%	774	94	81	438	158	3
Ward 3	\$71,782	15.7%	135	0	11	80	44	0
Ward 4	\$102,822	12.2%	2,463	393	846	866	355	3
Ward 5	\$111,064	14.0%	2,972	780	432	1,043	717	0
Ward 6	\$45,318	26.3%	4,843	981	1,301	1,295	975	291
Ward 7	\$114,363	12.0%	3,634	704	872	1,743	266	49
Ward 8	\$35,245	32.9%	6,375	1,300	2,299	2,413	340	23

Data sources: Open Data D.C. (interactive maps), “Economic Characteristics of D.C. Wards,” <https://opendata.dc.gov/apps/economic-characteristics-of-dc-wards/explore> and “Affordable Housing,” https://opendata.dc.gov/datasets/34ae3d3c9752434a8c03aca5deb550eb_62/explore?location=38.893664%2C-77.019147%2C11.70.

Additionally, the District has a large amount of land that cannot be used for housing due to historical designation or governmental use. The District requires most new residential developments to include affordable housing through the Inclusionary Zoning (IZ) program.²⁸³ From 2011 to 2019, the IZ program created 989 affordable housing units.²⁸⁴ The District allows ADUs but requires them to be owner occupied, limiting their usefulness for adding additional housing stock.²⁸⁵

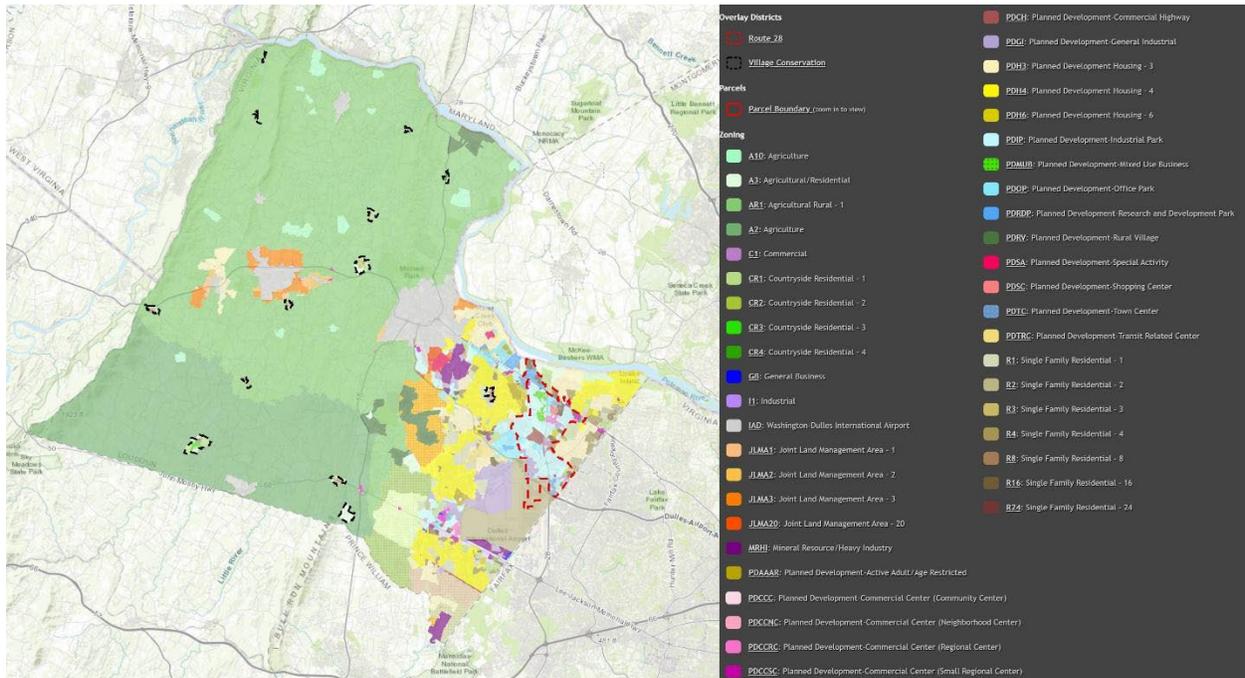
Fairfax County

Fairfax County is almost entirely zoned for single-family housing.²⁸⁶ Fairfax County began allowing ADUs in 2021 to enable homeowners to add smaller rental units onto their homes.²⁸⁷

Loudoun County

Loudoun County is the most rural jurisdiction in this analysis. The eastern part of the county, closest to the District of Columbia, contains more development. Moving westward, the county is less developed and less dense.²⁸⁸ Historically, Loudoun County’s land use policies and zoning laws have actively discouraged the type of development most conducive to affordable housing. Instead, Loudoun County has promoted low-density land uses.²⁸⁹

Map 87: Zoning Patterns, Virginia Jurisdictions



Source: Angela Woolsey, “Arlington Missing Middle Housing Study Sets October Kick-Off,” *ARLnow*, September 29, 2020, <https://www.arlnow.com/2020/09/29/arlington-missing-middle-housing-study-sets-october-kick-off/>.

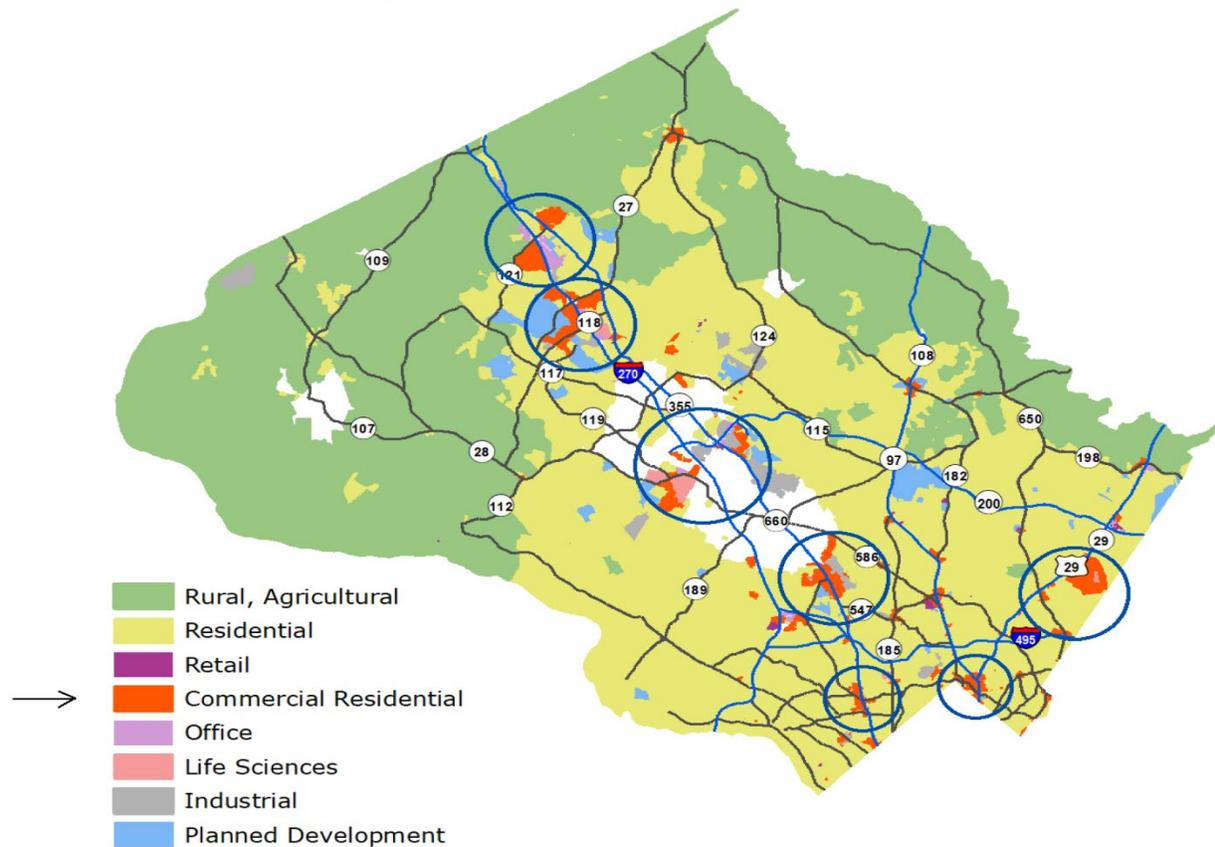
Loudoun County’s 2019 General Plan acknowledged the need for increased density land uses and created two “urban policy areas” near future train stations on the D.C. Metro’s Silver line.²⁹⁰ The urban policy areas aim to offer “a diversity of housing” and “offer flexible land use policies to allow for innovation and changing market demands.”²⁹¹ In addition, the 2019 General Plan promotes policies to increase density, such as the addition of residential units on existing housing single-family housing properties, more dwelling units per acre than currently are allowed, and mixed-use development.²⁹² These policies are often prerequisites for developing low- and moderate-income housing.

Loudoun County is currently rewriting its zoning ordinance to implement the 2019 General Plan.²⁹³ The zoning ordinance was last comprehensively rewritten in 1993, so most of the use categories and policies are not conducive to affordable housing development. The current zoning ordinance has only two use types amenable to multifamily development: R-16 and R-24.²⁹⁴ These use types make up a relatively small proportion of county land. Areas that are zoned for multifamily development are concentrated on the county’s east side, closest to the District of Columbia.

Montgomery County

Montgomery County’s zoning laws are a significant impediment to fair housing. Zoning laws allow apartments on less than 2 percent of county land and more than one-third of the county is restricted to single family homes.²⁹⁵

Map 88: Zoning Patterns, Montgomery County



Source: The Maryland-National Capital Park and Planning Commission, *Thrive Montgomery 2050*, April 2021, https://montgomeryplanning.org/wp-content/uploads/2021/02/THRIVE-Planning-Board-Draft-2021-Pages_web.pdf

Montgomery County attempted to relax zoning restricts to allow low- and moderate-income housing in 2010 by introducing a new zoning designation: commercial/residential.²⁹⁶ Areas designated as commercial/residential can have increased density and building height. However, areas zoned as commercial/residential are a relatively tiny percentage of the county. In 1980, Montgomery County set aside 93,000 acres along the northwest edge of the county, which is almost one-third of the county, as an agricultural reserve. The accompanying zoning ordinances severely limited housing development by requiring at least 25 acres per dwelling.²⁹⁷

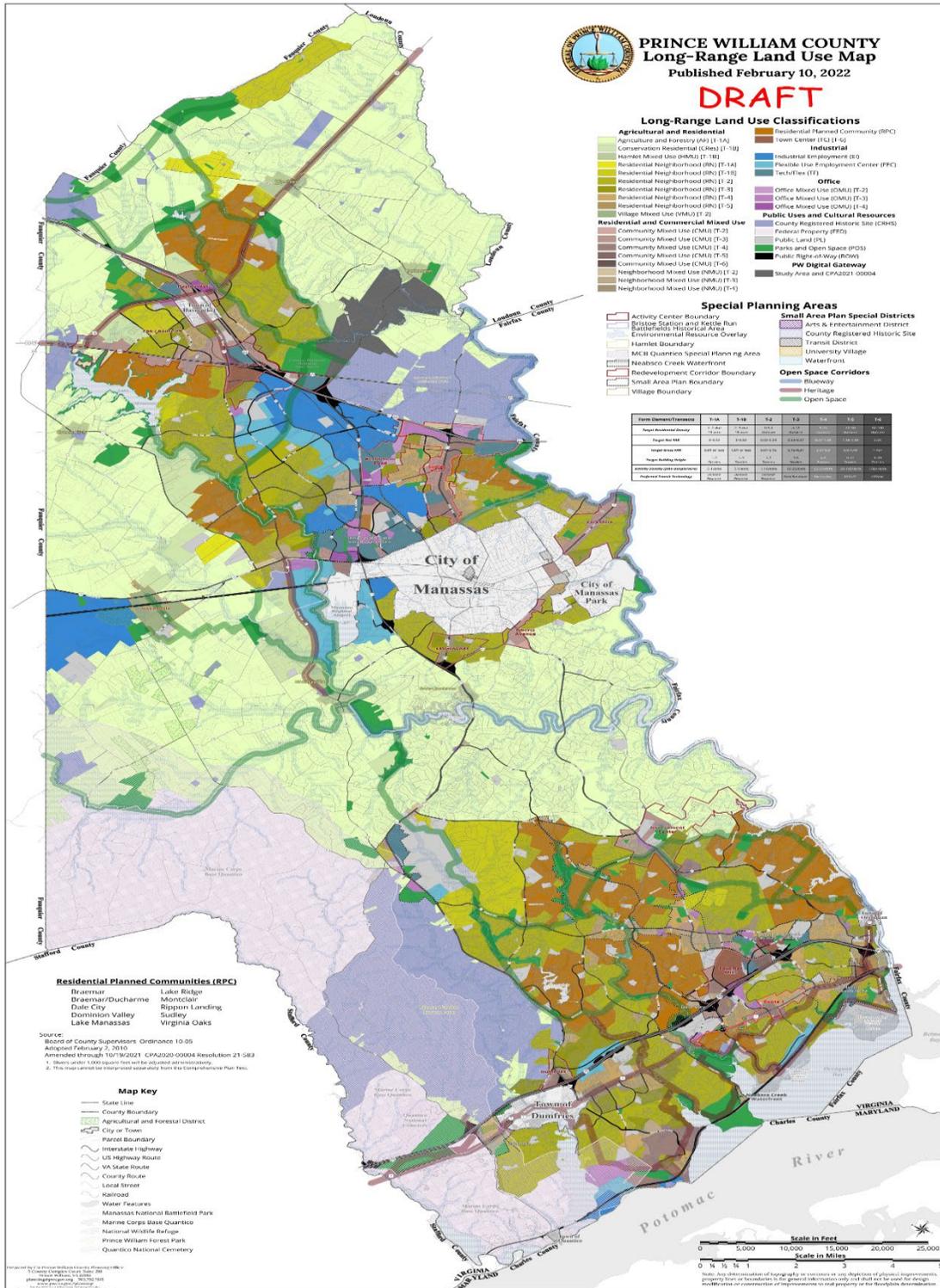
Montgomery County published a new General Plan in 2020, the first update since 1993.²⁹⁸ Montgomery County’s original General Plan used “wedges and corridors” to promote development along major thoroughfares and promote open spaces in other parts of the county.²⁹⁹ The General Plan published in 2020 acknowledges that the “wedges and corridors” unintentionally promoted unequal development and restricted housing construction.³⁰⁰ The updated General Plan encourages zoning reform to integrate “varied uses, building types, and lot sizes.”³⁰¹ Montgomery County launched a “missing middle” housing program to increase the supply of affordable housing.³⁰²

Prince William County

Over 75 percent of housing in Prince William County is single-family housing.³⁰³ Prince William County has issued a draft of the land use chapter of its Comprehensive Plan update, along with a long-range land use map.³⁰⁴ The plan contemplates changes to allow for a variety of housing types rather than single-family zoning and the relaxation of the rural area’s zoning from one house per 10 acres to one

house per 5 acres.³⁰⁵ The county has no ADU ordinance, voluntary inclusionary zoning, or affordable housing trust fund, making zoning a barrier to creating affordable housing.

Map 89: Long-Range Land Use Map, Prince William



Source: Prince William County Long-Range Land Use Map, February 10, 2022, https://www.pwcv.gov/assets/2022-02/DRAFT_LRLU_3000_36x66%202020201.pdf.

Lender Discrimination

The data on interest rates and mortgage applications demonstrate that people of color in the region face discrimination in lending.

Table 43: Interest Rates for Mortgage Applications in 2019

Municipality	2019 Median / Average Loan Interest Rate for White Borrower	2019 Median / Average Loan Interest Rate for Black or African American Borrower	2019 Median / Average Loan Interest Rate for Asian Borrower	2019 Median / Average Loan Interest Rate for American Indian or Alaska Native Borrower	2019 Median / Average Loan Interest Rate for Native Hawaiian or Other Pacific Islander Borrower
Alexandria	3.99% / 4.18%	4.00% / 4.30%	4.00% / 4.19%	3.94% / 5.42%	3.75% / 3.65%
Arlington County	3.99% / 4.20%	4.00% / 4.44%	3.88% / 4.06%	4.00% / 5.29%	4.17% / 4.07%
District of Columbia	3.98% / 4.20%	4.34% / 4.56%	3.88% / 4.03%	4.00% / 4.21%	3.99% / 4.74%
Fairfax County	3.99% / 4.22%	4.00% / 4.29%	3.88% / 4.13%	4.00% / 4.65%	3.99% / 4.56%
Loudoun County	3.99% / 4.25%	4.00% / 4.32%	3.88% / 4.05%	4.06% / 4.37%	4.13% / 4.98%
Montgomery County	3.99% / 4.21%	4.00% / 5.29%	3.88% / 4.08%	4.00% / 4.24%	4.31% / 4.85%
Prince William County	4.00% / 4.29%	4.00% / 4.21%	4.00% / 4.26%	4.19% / 4.48%	4.13% / 4.80%

Source: HMDA Data Browser, Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) (website), <https://ffiec.cfbp.gov/data-browser/data/2019?category=counties>.

Data provided via the Home Mortgage Disclosure Act disclosed widely varying interest rates for reported races related to all mortgage applications in 2019. The data showed that in several municipalities, including the District, Fairfax County, and Montgomery County, which have the largest populations, Black or African American mortgage applicants faced significantly higher average interest rates than White or Asian applicants.

The median interest rate for municipalities in the region was stable, with the District having a significantly higher median interest rate for Black or African American applicants. There were also troubling variations in interest rates for Native Hawaiians or other Pacific Islanders, but much less information was available for that demographic.

The trend of higher mean interest rates for Black or African American applicants compared with White applicants indicates that there is a higher occurrence of predatory high interest rate mortgages for Black applicants.

Table 44: Originated or Purchased Mortgage Applications

Municipality	White Applicants	Black or African American Applicants	Asian Applicants	American Indian or Alaska Native Applicants	Native Hawaiian or Other Pacific Islander Applicants
Alexandria	71.9%	55.5%	66.6%	52.2%	40.0%
Arlington County	72.9%	57.3%	66.0%	67.9%	56.2%
District of Columbia	72.5%	50.3%	67.8%	47.8%	50.0%
Fairfax County	69.3%	56.8%	61.7%	51.9%	53.8%
Loudoun County	70.3%	60.7%	63.8%	48.9%	58.8%
Montgomery County	67.6%	55.6%	61.8%	54.8%	42.9%
Prince William County	66.5%	57.2%	59.6%	47.8%	47.4%

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA), *HMDA Filing Platform*, <https://ffiec.cfpb.gov/data-browser/data/2019?category=counties>.

Similar to the interest rate data, the data on rate of mortgage applications that resulted in an issued or sold mortgage demonstrates that it is harder for non-White applicants to receive a mortgage. White applicants in all municipalities were significantly more likely to receive a mortgage upon application than other races.

Location and Type of Affordable Housing

District of Columbia

D.C. Open Data, a project of the District government, maintains data on affordable housing sites in the District, as well as a map of such units.³⁰⁶ The dataset contains 577 affordable housing sites, but only 513 of these currently contain 1 or more affordable housing units. These units are located across Wards 1, 4, 5, 6, 7, and 8, which have substantially larger low-income populations than Wards 2 and 3. Sites with more units (tens or hundreds, with the largest containing 668 units) appear more often in Wards 6, 7, and 8. Units also vary in affordability with respect to the AMI.

Virginia

Alexandria, Arlington County, Fairfax County, and Loudoun County all maintain lists of affordable housing units within their jurisdictions.³⁰⁷ Prince William County no longer maintains such a list. Among the four jurisdictions that do, affordable housing appears to be available in a range of locations and types. Publicly and privately-owned housing options exist, including market-rate housing with affordable units. Housing is also distributed across a variety of neighborhoods, with complexes containing anywhere from fewer than 10 units to over 200 units.

Maryland

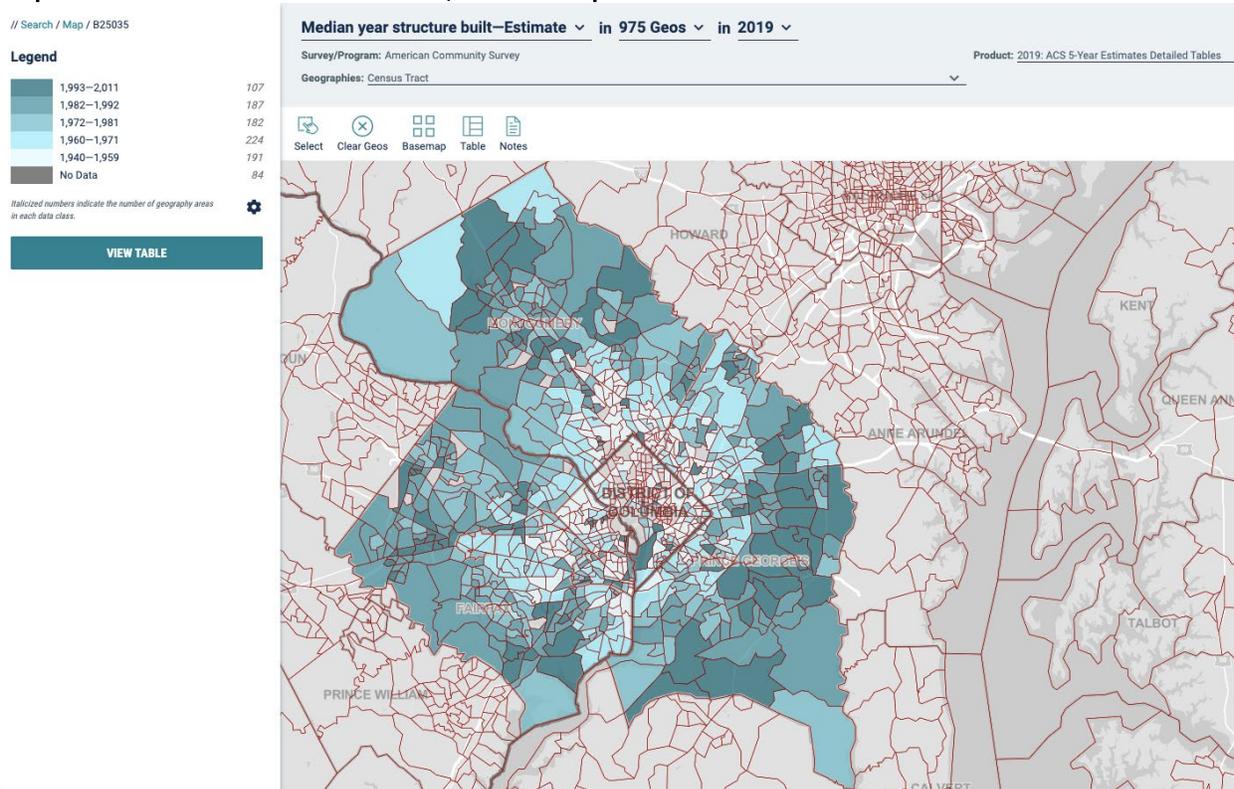
Montgomery County's Moderately Priced Dwelling Unit (MPDU) Program offers access to affordable units in apartment complexes throughout the county. The list includes 71 sites, most with at least 20

units in a range of sizes, from efficiencies to three-bedroom units.³⁰⁸ The sites, which include both high-rise and garden-style apartments, encompass all major municipalities within the county and have rents starting from \$1,133.

Location of Accessible Housing

The location of accessible housing is not a significant contributing factor to fair housing issues in the Washington, D.C., metropolitan area. Although it is not possible to precisely map the location of accessible housing in the area, it tends to exist where there are concentrations of new multifamily housing and where there are concentrations of publicly supported housing. These two dimensions cut in somewhat contradictory directions. The American Community Survey does not facilitate the disaggregation of housing units by the number of units in a structure and year a structure was built together, but it does allow a look at those two data points separately. As the following maps reflect, there is some overlap. For example, both newer and denser housing is clustered in parts of Arlington and Fairfax Counties. There are concentrations of new predominantly single-family homes in the northern part of Montgomery County, the western part of Fairfax County, and the center of the District of Columbia. There are concentrations of older multifamily housing in and surrounding the District of Columbia. The parts of the county with more new multifamily housing offer high access to opportunity in an area-wide perspective.

Map 90: Median Year Structure Built, D.C. Metropolitan Area



Source: ACS 2019 5-Year Estimates, Table [B25035](#).

Map 91: Units in Structure (20+), D.C. Metropolitan Area

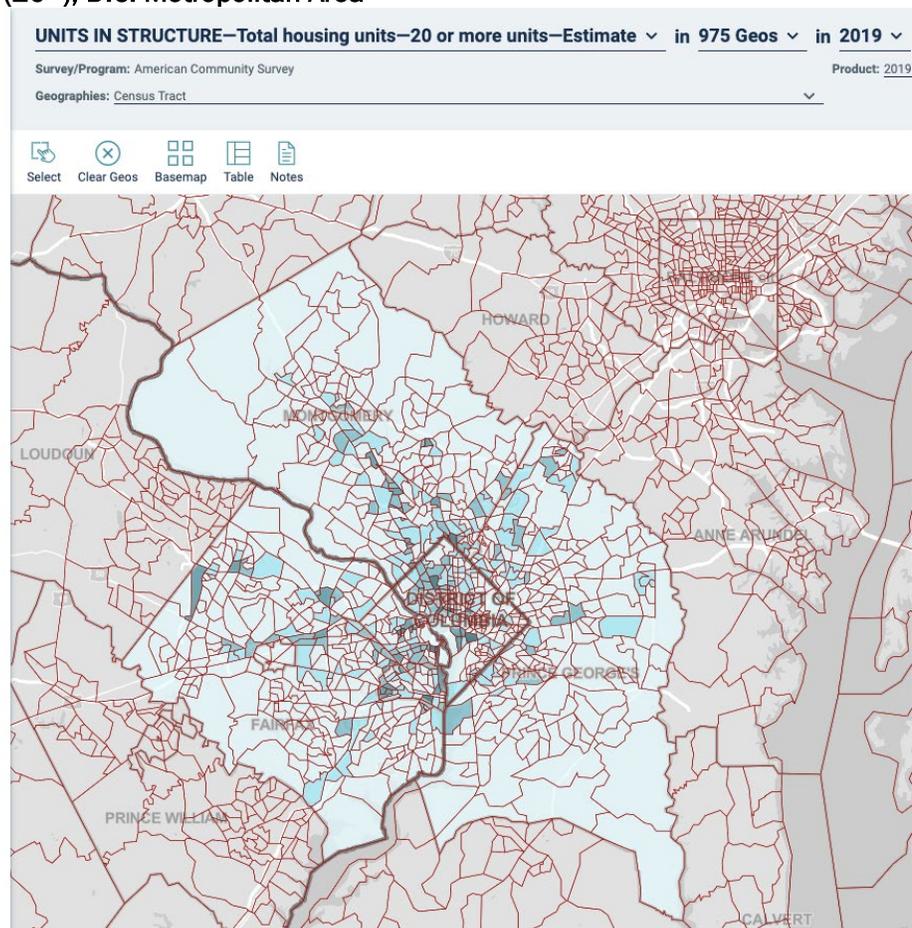
// Search / Map / DP04

Legend

2,762–5,199	15
1,623–2,761	43
757–1,622	96
231–756	171
0–230	650
No Data	0

Italicized numbers indicate the number of geography areas in each data class.

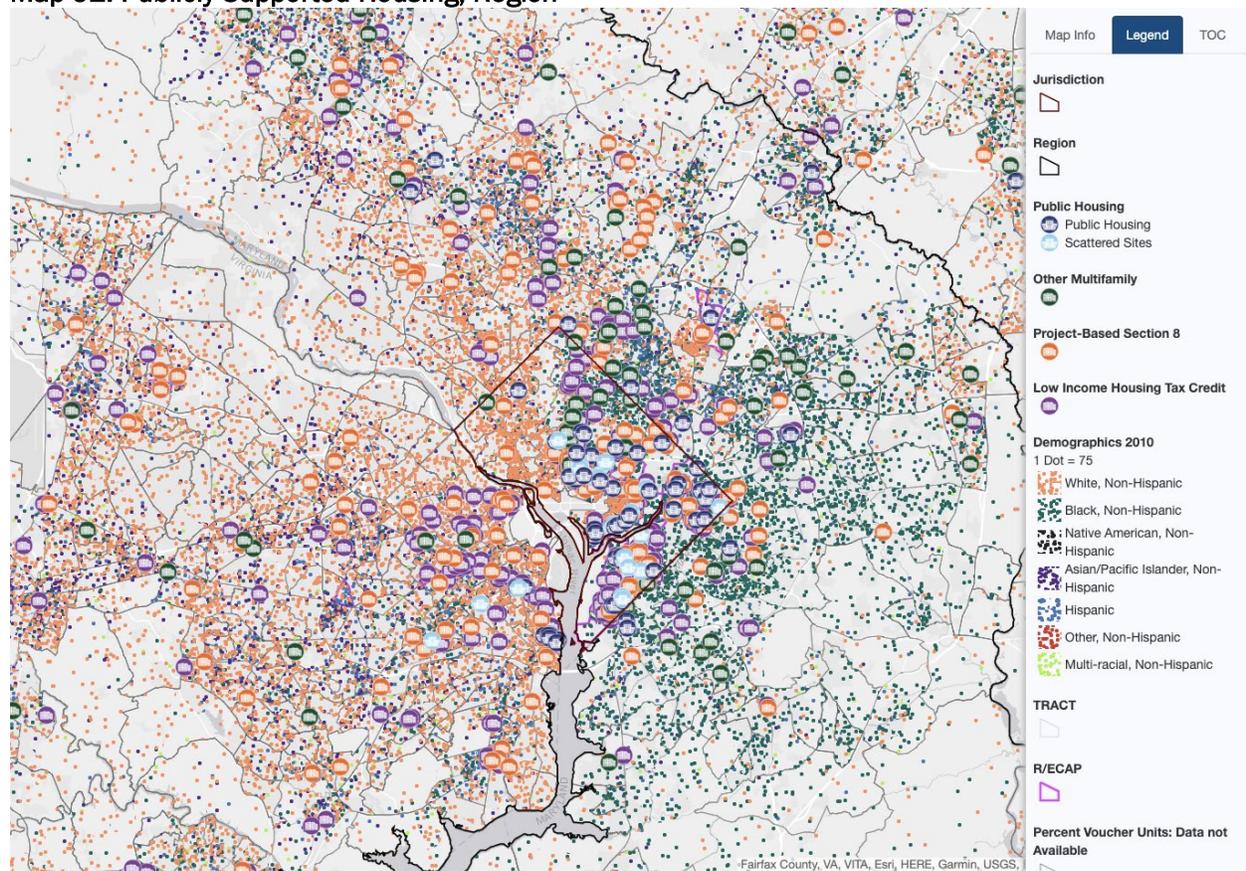
[VIEW TABLE](#)



Source: ACS 2019 5-Year Estimates, [Table DP04](#).

By contrast, publicly supported housing, as reflected in Map 3, is much more concentrated in the areas on the edges of and immediately surrounding the District of Columbia, places that do not have concentrations of new multifamily development. The upshot is that it is likely that, between the two categories of housing that are comparatively more likely to be accessible, there is wide dispersion across the metropolitan area. Across the area, places with accessible housing include high opportunity areas. When affordability is not factored into consideration, the location of accessible housing does not appear to significantly contribute to fair housing issues.

Map 92: Publicly Supported Housing, Region



Source: [HUD, Affirmatively Furthering Fair Housing Tool, D.C. Metropolitan Area](#)

Location of Employers

Region

The location of employers is a contributing factor to disparities in access to opportunity in the District of Columbia's metropolitan region. The highest paying jobs are primarily located in downtown D.C., where employers occupy office buildings in the most expensive part of the region. These employers provide jobs to hundreds of thousands of people who reside outside of the District, indicating that expensive housing costs have forced at least some individuals who would otherwise live in the District of Columbia to reside further from the city center in the greater metropolitan region.

The long commute times of District employees are evidence of how high housing costs have pushed people to reside farther away from their employers in the larger metropolitan region. District employees face some of the longest commute times in the nation: census estimates indicate that the average person travels 43 minutes to work each day. This is almost twice the length of the commute of the average American, who spends approximately 27 minutes traveling to work each day. The metropolitan D.C. region has consistently been ranked as one of the most expensive housing markets in the nation, and these census findings echo a study conducted by the Brookings Institution that concluded that commutes tend to be longer in metropolitan areas where housing is the priciest.³⁰⁹

A spatial mismatch in jobs and affordable housing often places a significant burden on workers. Long commutes cut into time that could otherwise be spent with family members or friends or pursuing interests unrelated to work. Traveling to and from work—enduring traffic jams, unforeseen circumstances, and bad weather—are additional stressors. Numerous studies have shown that

individuals with long commutes suffer from psychosomatic disorders at a much higher rate than those with short trips to work.³¹⁰ The psychological, physical, and financial burdens that coincide with long commutes all play a factor in hindering the access to equal opportunity of residents of the metropolitan D.C. region.

Alexandria

Despite being home to many large employers—the US Department of Defense, US Trademark and Patent Office, Salvation Army, and Society for Human Resource Management among them—people who both live and work in Alexandria are by far the city’s minority. Approximately 16 percent of Alexandria residents live and work in Alexandria, while 84 percent of the city’s residents commute out of Alexandria each day. Alexandria residents spend slightly more time than the average American commuting to work each day (30.1 minutes) and are primarily traveling to employers in the District and Fairfax County.³¹¹ These individuals have access to public transportation via bus and Metro.

Arlington County

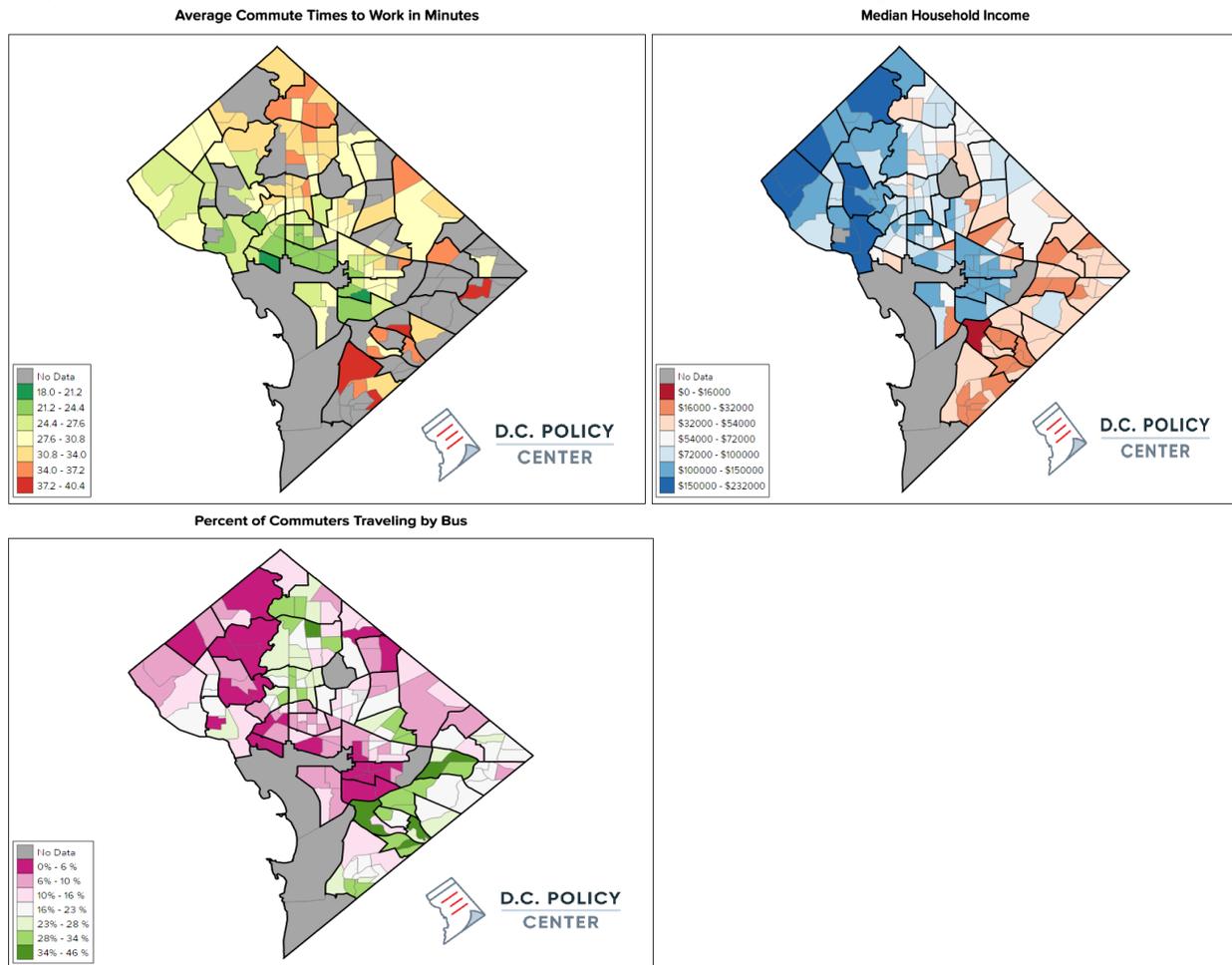
While it is estimated that only 19.86 percent of Arlington County residents work within the county, residents’ commute times mirror those of the average American; the average Arlington County resident spends 27.2 minutes traveling to and from work each day.³¹² Those commuting out of the county are traveling primarily to the District, with approximately 70 percent traveling by car or train. The county’s biggest employers are Accenture, Deloitte, the Virginia Hospital Center, Booz Allen Hamilton, and Garter, and approximately 50,000 residents of the larger metropolitan region commute to Arlington County each day to work for these companies, among others.

District of Columbia

District residents spend slightly more time than the average American commuting to work each day, with the average District resident traveling just under 29 minutes to get to work. Approximately 9 percent of all District residents, however, endure “super commutes” and spend more than an hour getting to work each day.³¹³

A 2017 study conducted by the D.C. Policy Center suggests that the time it takes a District resident to commute to work is strongly linked to their income. People who live in the Georgetown and Capitol Hill neighborhoods, where residents’ average median income is highest, have the shortest average commutes; it often takes residents of these neighborhoods just less than 24.4 minutes to get to work each day. Meanwhile, those who live in neighborhoods like Brightwood, Petworth, and Anacostia have longer commute times than the overall city average. The southeastern quadrant of the District endures the longest commute times of them all, with Marshall Heights residents traveling almost 40 minutes on average in order to get to work each day. The percentage of commuters traveling by bus is also highest in the southeastern quadrant of the District, where incomes are lowest and there are no Metro stops.³¹⁴ These results indicate that low-income people residing within the District must both travel further to access employment and utilize less reliable means of transportation in order to do so.

Map 93: Commute Times, Household Income, and Commuters Traveling by Bus, District of Columbia



Source: Randy Smith, DC Policy Center, Commute times for District residents are linked to income and method of transportation, March 23, 2017, <https://www.dcpolicycenter.org/publications/commute-times-for-district-residents-are-linked-to-income-and-method-of-transportation/>

Fairfax County

Unlike other individuals residing in the District's metropolitan region, most Fairfax County residents live and work within the county. Approximately 60 percent of Fairfax County residents commute to work within the county, while only 15 percent commute to the District and 12 percent commute to Arlington County or Alexandria for work.³¹⁵ The average commute for Fairfax County residents is 30.2 minutes, slightly above the national average.³¹⁶ Those who live and work within Fairfax County, however, earn lower incomes on average than those traveling out of the county for work. The largest employers in the county are Booz Allen Hamilton, Inova Health System, Federal Home Loan Mortgage Corp., and Lockheed Martin.³¹⁷ Commuters have access to public transportation via the Metro, Metrobuses, and local buses.

Unlike in other parts of the region, there are significant data detailing the demographics, incomes, and jobs of those commuting to the District to work. An estimated 40 percent of those commuting to D.C. are employed by the government, and these in-commuters make more money, on average, than those who live and work in the place they reside.³¹⁸ These findings strike contrary to the trend for District residents, with low-income residents—not high-income earners—enduring the longest commute times on average.

Loudoun County

Of the 177,432 working residents of Loudoun County, an estimated 70 percent commute out of the county for work each day, traveling primarily to Fairfax County and the District. Meanwhile, only 30 percent of Loudoun County residents both live and work within the county.³¹⁹ At least some of these individuals are likely working for the county's largest employers: the Loudoun County Public School System, local government, Verizon, Northrop Grumman, and United Airlines, among others.³²⁰ The average commute time for Loudoun County residents is 32 minutes—5 minutes longer than the national average.³²¹

Montgomery County

Despite being home to the National Institute of Health, US Food and Drug Administration, Naval Support Academy Bethesda, Marriott International, Lockheed Martin, and other large employers,³²² more than one-half of Montgomery County residents commute out of the county for work each day. The average Montgomery County resident travels 32.7 minutes to work, and more than 3 percent of all employed residents have “super commutes” in excess of 90 minutes. Montgomery County residents spend more time, on average, commuting to work than any other residents of the metropolitan region.

Prince William County

In Prince William County, a larger proportion of residents commute outside of the county for work than anywhere else in the District metropolitan region. Only one-quarter of all Prince William County residents work within county lines. Meanwhile, approximately three-quarters of all county residents are commuting out of the county for work, traveling primarily to Fairfax County and the District. Almost one-half of out-commuters leave for work before 7:00 a.m.³²³

Location of Environmental Health Hazards

District of Columbia

In an Environmental Protection Agency ranking of the severity of environmental pollution in metropolitan areas in the United States, the District of Columbia ranks 576 out of 2,357 localities.³²⁴ A study by the D.C. Policy Center found that Wards 4, 5, and 6 are disproportionately exposed to chemicals in the soil, air, and water from sources outside of daily activity. Sources of such exposure include soil contamination from leaking underground storage tanks (Ward 4 has the largest number of active tanks, with 36; it is followed by Wards 4 and 6, with 17 each), brownfields, and superfund sites. Air pollution is also a major concern; Ward 1 has the highest concentration of ozone, largely driven by vehicle exhaust, and Ward 7 has the highest levels of particulate matter. Water pollution is a further concern; Ward 6 and the southeastern portion of the city are particularly exposed to sewer overflows. In general, the northeast and southeast quadrants of the city are most susceptible to environmental health hazards. These are also the areas where affordable housing is most needed and most prevalent.

Virginia

A March 2021 report by the Environmental Working Group found per- and polyfluoroalkyl substances (PFAS) levels in water samples taken from northern Virginia to be some of the highest in the country. The most severely polluted samples were taken from areas closest to D.C., though Prince William County water also has high levels of the toxins.³²⁵ Northern Virginia is also known for its polluted air—the Environment Virginia Research and Policy Center reported 84 dirty air days in 2016.³²⁶

Maryland

Montgomery County is home to 30 superfund sites. Of these, 10 are active non-NPL (sites not on the national priority list in terms of threatened releases of hazardous substances) and 20 are archived;

none are active NPL sites.³²⁷ Gaithersburg ranks in the 90th and 80th percentile, respectively, for residents in close proximity to these sites. Air pollution in Montgomery County occasionally exceeded the regulatory standard in the 2000s, but this has become rarer in recent years.³²⁸ Gaithersburg has several air quality risks that pose hazards to human health. The environmental justice indexes show that Gaithersburg nationally ranks in the highest percentile for concentrations of diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard.³²⁹ The western part of the area also ranks in the 90th percentile for traffic proximity, meaning that nearby residents have higher exposure to mobile sources of air pollutants.³³⁰

Location of Proficient Schools and School Assignment Policies

District of Columbia

D.C.'s School Transparency and Reporting (STAR) Framework has consistently confirmed the existence of deep inequities in school quality in the District.³³¹ A map in the 2018-2019 school year report shows that Wards 7 and 8, and, to a lesser extent, Ward 6, are more likely to have schools with lower STAR ratings, which denote lower student achievement, student growth, college and career readiness, and graduation rates as well as poorer school environments characterized by poorer attendance, inconsistent enrollment, and poorer safety and discipline standards.³³² These inequalities stem from the historic failure to desegregate D.C. schools as well as the tendency for wealthier families, especially in Wards 2 and 3, to send their children to private schools.³³³

Virginia

Northern Virginia is known to have some of the state's highest-performing school districts, and academic achievement in public schools in Arlington County is particularly high.³³⁴ However, inequalities continue to pose a challenge in the region. For example, while most high schools in Loudoun County have dropout rates below 1 percent, some schools in Fairfax County have dropout rates well above 15 percent. Similar disparities exist for measures like chronic absenteeism and accreditation rates as well as with numeric measures of student achievement.

Maryland

Montgomery County Public Schools (MCPS) are among the most well-resourced and highest-achieving schools in Maryland. However, there are many areas in which MCPS continues to fall short of targets. In particular, academic achievement of Black students, Hispanic students, students with disabilities, and English learners continues to be inadequate. Though the school district continues to improve in its provisions, these improvements have not extended to all demographics of students; in particular, Hispanic and English-learner students have not seen improvements in academic achievement or graduation rates in the past several years.³³⁵

Loss of Affordable Housing

Region

The loss of affordable housing in the region contributes to segregation and the creation of R/ECAPS throughout the metropolitan area.

Broadly, constrained housing supply and the explosive growth of the region have contributed significantly to the loss of affordable housing in the area. These affordable housing losses are primarily concentrated in the District, Alexandria, and Arlington County, which, at one time, were home to a sizable population of affordable housing units. Alexandria, in particular, has eliminated almost ninety percent of the city's affordable housing stock in just two decades. Almost every member of the District of Columbia's metropolitan region has coordinated efforts to expand affordable housing in their area,

though many will not create the number of housing units that are needed to make up for the market's substantial losses.

Alexandria

Wage stagnation, gentrification, and the growing popularity of the city itself have driven up Alexandria's housing prices and created a crisis for those who rely upon affordable housing to live. The latest American Community Survey approximates that 14,500 renter households earning less than \$75,000 are burdened by Alexandria's housing costs and unable to properly invest in other necessities. The situation is even more dire for the city's 6,600 renter households earning less than \$50,000, who spend 50 percent or more of their monthly earnings on housing-related costs.³³⁶

These burdens are at least partly due to the loss of affordable housing in Alexandria. Between 2000 and 2017, the City of Alexandria lost 90 percent of its affordable housing. Alexandria, which once offered more than 18,000 units of affordable housing, now has only 1,749 affordable housing units in the city. These affordable units are unsubsidized, privately-owned units that cater to low-income renter households. Very few of these units, however, can accommodate larger families who earn 60 percent of the AMI or less. Two-thirds of the affordable units in the city are studio or single-bedroom units, 27 percent are two-bedroom units, and just 7 percent are three-bedroom units.³³⁷ Thus, with few housing options in the first place, at least some Alexandria residents must crowd their families into the first affordable housing unit that becomes available to them.

In May of 2021, the City of Alexandria announced a plan to build 480 affordable units in the next three years on the site of the old Safeway on West Glebe Road.³³⁸ One-quarter of these units are to be deemed "deeply affordable," and thus set aside for families making 40 percent of the AMI.³³⁹ While these housing units will likely ease the housing burden of at least some low-income Alexandria residents, they will be unable to make up for the significant loss of affordable housing units that has occurred over the past two decades.

Arlington County

In Arlington, the loss of affordable housing has been spurred by the increasing popularity of the city, which has driven up the cost of living and, consequently, the cost of housing as well. There are only 9,500 apartments for rent that are affordable to the approximately 17,000 renter households with incomes below 60 percent of the AMI. Older apartments and homes that were at one time affordable to those with incomes below 60 percent of the AMI have been renovated or replaced, with these improved units boasting higher rents than the original ones.³⁴⁰ From 2000 to 2013, Arlington County lost 13,500 affordable housing units from 2000 to 2013, many of which were naturally occurring, market-affordable housing units.³⁴¹

Because of the continual loss of naturally occurring, market-affordable housing units, Arlington's affordable housing program has announced that it is primarily focusing on both preserving and increasing the number of committed affordable rental units. By 2040, Arlington County aims for 17.7 percent of the county's housing stock to be affordable to residents with incomes at or below 60 percent of the AMI. They have not given up on naturally occurring affordable housing, however, and have committed to preserving 60–80 percent of the current naturally occurring affordable housing stock as well.³⁴²

District of Columbia

In the District, declining housing construction, rising demand, and market pressures have all spurred the loss of the city's affordable housing units. In fact, the District now has half as many affordable units as it reported in 2002. Adjusted for inflation, the number of District apartments with rents under \$800 fell from almost 60,000 in 2002 to 33,000 in 2013.³⁴³ Meanwhile, the number of properties

for rent between \$1,300 and \$2,500 has skyrocketed, making subsidized housing effectively the only source of affordable housing in the city.³⁴⁴ Among residents earning 30–50 percent of the AMI, 31 percent are considered severely burdened by housing costs.³⁴⁵

In May 2019, D.C. Mayor Muriel Bowser signed *The Housing Framework for Equity and Growth*, which called upon local agencies to create and preserve affordable housing units in the city. In order to do this, District agencies are tasked with creating an additional 36,000 housing units, with at least 12,000 units designated as affordable housing for low-income residents. The District hopes to preserve at least 6,000 existing affordable housing units by funding the maintenance, inspection, and repair of old units and allowing vulnerable populations to “age in place.”³⁴⁶

Fairfax County

While it is unclear whether Fairfax County has lost affordable housing units in recent years, there is—at the very least—a need for *more* affordable housing in the area. In Fairfax County, one in five renters spends more than half of their monthly earnings on housing costs.³⁴⁷

In an attempt to subsidize affordable housing units in Fairfax County, in 2019, county lawmakers announced their commitment to produce and preserve affordable housing in the area. The county has adopted the goal of constructing a minimum of 5,000 new rental homes over the next 15 years for residents earning 60 percent of the AMI or less. In order to preserve existing affordable housing units, the county has partnered with private and public entities to create “committed affordable homes” that are required to keep rent affordable for a specific period of time. Today, most of the county’s committed affordable homes for residents earning 60 percent of the AMI or less are located within the Parkwood, Murraysgate, Landing I, and Landing II housing projects. There are 628 units, with 640 more “in the pipeline” to be created at the Little River Glen, New Lake Anne House, One University, and Stonegate Village housing projects.³⁴⁸

Loudoun County

Unfortunately, there are not sufficient data documenting either the loss or growth of Loudoun County affordable housing units over time. Nevertheless, the need for more affordable housing units in the area is evident. In 2017, approximately 81 percent of Loudoun County households earning 30–50 percent of the AMI reported being cost burdened and approximately 39 percent reported being severely cost burdened.³⁴⁹ The county additionally reports that, of the 168 LIHTC units that are affordable to households earning 60 percent of the AMI, none are expected to be income restricted after 2028.³⁵⁰

In June 2021, the Loudoun County Board of Directors announced that they had adopted the *Unmet Housing Needs Strategic Plan*, which is intended to help the county and its partners improve housing access, quality, and affordability for all families in the area. By 2040, the county aims to construct 16,000 new housing units, of which 20 percent—or 8,200 units—are to be designated affordable housing for those who make at or below 100 percent of the AMI.³⁵¹

Montgomery County

In Montgomery County, there is a large gap in the demand and availability of housing units to those making below 100 percent of the AMI. While there are an estimated 25,081 units available to Montgomery County households that earn less than 50 percent of the AMI, 49,675 are needed, resulting in an affordability gap of 24,590 units.³⁵² This affordability gap shows no signs of shrinking, as the rise of Montgomery County’s median gross rent continues to outpace the growth of the area’s median income.³⁵³ The *Montgomery County Housing Needs Assessment* published in 2020 pointed to “significant pricing pressure” as a leading cause for the loss of affordable housing in several of its

jurisdictions, including Gaithersburg, which experienced a net loss of 246 units of affordable housing from 2010 to 2018.³⁵⁴

Since county officials set out to preserve deed-restricted housing units in 2000, Montgomery County has created deed-restricted housing units at a faster rate than it has lost them. Unfortunately, however, the same cannot be said for the county's naturally occurring affordable housing units, which account for 80 percent of all affordable housing units in the area. In two decades, Montgomery County has lost more than 19,000 naturally occurring affordable housing units. Current projections estimate that the county is slated to lose an additional 7,000–11,000 more units by 2030. If these estimations are accurate, then the county will have fewer than 20,000 naturally occurring affordable housing units in less than 10 years.³⁵⁵

Like Fairfax County, Montgomery County has committed to ensuring that there is no net loss of affordable housing units in the coming years. In 2019, county lawmakers announced that they intended to add 41,000 new housing units by 2030, with most of them affordable to low- and medium-income residents.³⁵⁶ Montgomery County has also begun to incentivize housing developers to build naturally occurring independent housing units. The county will exempt developers from paying development impact taxes, for instance, if they construct a new housing complex and designate at least one-fourth of these new units as affordable housing.³⁵⁷ To ensure that there is no net loss of affordable housing units in Montgomery County, local lawmakers have also passed a series of initiatives aimed at preserving existing affordable housing units. Among these initiatives are the requirement that all rental units undergo annual inspections and the adoption of stricter penalties for housing code violations. The county also allows tenants and municipalities to purchase properties before landlords offer them to outside buyers. Currently, Montgomery County, Prince George County, and the District are the only jurisdictions in the country that allow such a practice, and it has shown significant success in preventing the loss of additional affordable housing units in these areas.³⁵⁸

Prince William County

There are insufficient data regarding the amount of affordable housing in Prince William County over time. Nevertheless, the severe lack of affordable housing in the area is evident. An estimated 51,938 households in the county, about a third of the total, have one or more housing problems, which include affordability, lack of complete kitchen or plumbing facilities, and overcrowding. About 1 in 5 households (19 percent) had a cost burden and 13 percent had a severe cost burden. These shares were higher for renter households, with 27 percent being cost burdened and 23 percent severely cost burdened. In fact, Prince William County's affordable housing market is so overwhelmed that the county's HCV program is currently closed due to the sheer number of residents on the waiting list.³⁵⁹

There is no local funding source to incentivize the construction of affordable housing units in Prince William County, and the county currently has no plan to do so. The Prince William County Planning Commission proposed a series of affordable housing policies in July 2021, though county officials have yet to come to a decision about the best path forward. In May 2021, however, the Prince William County Board voted five to three to approve an affordable housing development in the county's "Rural Crescent."³⁶⁰

Occupancy Codes and Restrictions

All municipalities in the D.C. metropolitan region use International Code Council (ICC) standards as the foundation for their construction codes and International Building Codes (IBC) as the foundation for their building codes. How the region's municipalities and counties define *family* varies, but none of the definitions are so restrictive that they negatively affect access to housing.

Loudoun County, Prince William County, Arlington County, and Alexandria all have similar definitions of family, with each ordinance defining a family as including any number of people “related by blood or marriage together with any number of natural, foster, step, or adopted children.” However, they sometimes differ from one another with regard to how many unrelated individuals can live together to constitute a family. Arlington County, Alexandria, and Loudoun County all cap the number of unrelated individuals living together to four, or two unrelated adults plus their children.³⁶¹ Prince William County’s zoning ordinance caps a family at three unrelated individuals, or two unrelated adults plus their children.³⁶² While each of these counties and municipalities should increase the cap of unrelated individuals that can live together in a household, this is especially true for Prince William County, which has the lowest number of allowed unrelated persons in a household of the entire metropolitan region.

Both the District and Montgomery County utilize the term *household* instead of family in their zoning ordinances. The District’s definition of household is the broadest in the metropolitan region. Not only is a household defined as “any number of people related by blood, marriage, adoption, or guardianship,” but it also considers six unrelated people and “two unrelated people and any children, parents, siblings, or other persons related to either of them by blood, adoption, or guardianship” to be a household as well.³⁶³ Montgomery County’s definition of a household is identical to the District’s, though they cap the number of unrelated people living in a particular place at five individuals instead of six.³⁶⁴

Private Discrimination

District of Columbia

The D.C. Office of Human Rights has not released a detailed annual report since 2018. That report described continued increases in cases filed regarding fair housing and public accommodations (53 and 57 cases, respectively, as opposed to 42 and 47 the previous year).³⁶⁵ Of the fair housing cases, 22 cited source-of-income discrimination, 16 cited discrimination based on disability status, and 4 cited race discrimination. The public accommodation cases included 14 cases of sex discrimination, 13 cases of discrimination based on disability status, and 9 cases of race discrimination. The report does not specify how many cases within these categories were mediated or settled.

Virginia

Fairfax County Human Rights Commission’s annual report from FY2019–2020³⁶⁶ states that in 2018, 20 fair housing cases were filed involving the county. In 2019, this number was 22; in 2020, it increased to 35, or one-third of the total cases filed (105). Of the 2020 cases, 24 involved disability-related discrimination (the most significant factor), followed by race (11 cases), national origin (5 cases), and sex (4 cases). Twenty cases were resolved in 2020, though it is unclear if these cases were also filed in 2020. Fairfax County and Prince William County have also seen several private discrimination lawsuits in recent years, including one alleging discrimination based on family structure and another alleging discrimination based on disability.

Maryland

After D.C., Montgomery County has seen the largest number of private discrimination lawsuits of any jurisdiction in the county between 2020 and 2022. These suits include allegations of discrimination based on age, source of income, and disability and involve several property management companies that operate in Montgomery County and elsewhere in the region. Thus, it appears that private discrimination by management companies, private landlords, and community members, such as neighbors, continues to contribute significantly to impediments to fair housing in the region.

Quality of Affordable Housing Information Program

District of Columbia

Department of Housing and Community Development Community-Based Non-Profit Organizations (CBOs) provide housing counseling services and training to potential homeowners, current homeowners, and tenants, focusing on low- to-moderate income residents and neighborhoods.³⁶⁷ Services are provided to assist tenants in understanding their rights and responsibilities, including issues such as potential displacement, rental/eviction counseling, and apartment locating. Though all of these CBOs are based in the District, some serve the greater Washington, D.C., region as a whole. However, only a few of these organizations are specifically dedicated to housing issues and the provision of mobility counseling. Others are more general economic empowerment and economic development organizations. HUD maintains a separate but overlapping list of HUD-approved housing counseling agencies in the District that has similar characteristics.³⁶⁸ Thus, more specifically designated general-eligibility mobility counseling in the District is needed.

Virginia

HUD maintains a list of HUD-approved housing counseling agencies in Virginia.³⁶⁹ Only a handful of these are based in northern Virginia, and most of those agencies serve prospective homebuyers rather than tenants, suggesting a serious lack of support for low-income communities and residents. Virginia Housing, for example, offers a free homebuyer class for those who are purchasing a house for the first time.³⁷⁰ New homeowners in Loudoun County have the opportunity to participate in the county's "HomeCents" online seminar that teaches new homeowners how to manage their investment, file their taxes, prevent foreclosure, and maintain their new home.³⁷¹ There are two counseling agencies that are both located in the District metropolitan region and provide rental counseling to residents: Money Management International in Alexandria and Northern Virginia Family Services and Cornerstones Inc. in Fairfax County.³⁷² Considering the significant number of residents who need renter-oriented affordable housing information programs, there are simply not enough programs available to keep up with the demand rising throughout northern Virginia.

Maryland

HUD's list of HUD-approved housing counseling agencies in Maryland includes four organizations based in Montgomery County, most of which provide rental housing counseling.³⁷³ However, there is a clear gap between supply and demand for such counseling services, given the large population of Montgomery County and the small number of existing agencies. The county government does not appear to run or support mobility counseling programs—a fact that further exacerbates this gap. Housing counseling agencies that offer assistance to both renters and potential homeowners include the Housing Initiative Partnership, Inc., Homefree-USA of the Washington, D.C., metropolitan area, Greater Washington Urban League, and Centro de Apoyo Familiar.³⁷⁴

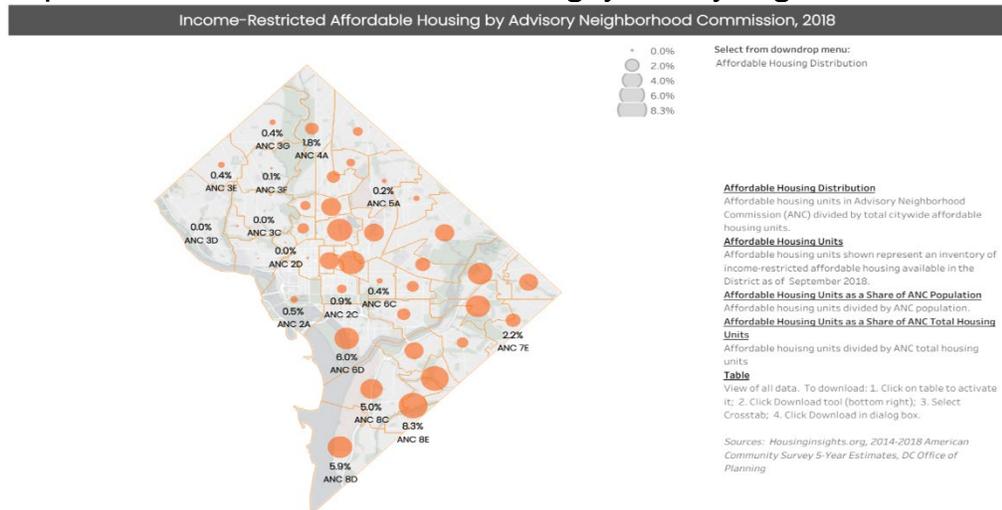
Regulatory Barriers to Providing Housing and Supportive Services for Persons with Disabilities

Regulatory barriers are not a significant contributing factor to fair housing issues for persons with disabilities in the Washington, D.C., metropolitan region. There are no specific examples of regulations that make the provision of supportive services difficult. Some policies have been put in place that support housing for persons with disabilities. For example, Fairfax³⁷⁵ and Arlington³⁷⁶ Counties require property owners who desire to convert a building from multifamily rental housing to a condominium or cooperative to allow tenants with disabilities a three-year extension on their leases. Moreover, both Maryland and Virginia expand the scope of protected classes beyond those recognized in federal law to include the prohibition of source-of-income discrimination as well as directives to prevent blanket bans on individuals based on their criminal records.

Siting Selection Policies, Practices, and Decisions for Publicly Supported Housing

Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Action Plans (QAPs) and other programs, are significant contributing factors to the segregation of public housing units. Throughout the greater Washington, D.C., metropolitan region, affordable housing units are located primarily in low- and middle-income areas. For instance, while 6E (Shaw) and 8E (Congress Heights, etc.) together make up 15 percent of the total affordable housing units in the District, there are no income-restricted housing units in the upper-income, predominantly White 2D (Kalorama), 2E (Georgetown/Burleith), 3C (Woodley Park/Cleveland Park), and 3D (Spring Valley/AU Park) neighborhoods.³⁷⁷ The low-income, minority-majority neighborhoods in which affordable housing is predominantly located are often far from transit, contributing to disproportionately long commutes and high transportation costs for the neighborhood's residents.³⁷⁸

Map 94: Income-Restricted Affordable Housing by Advisory Neighborhood Commission, 2018



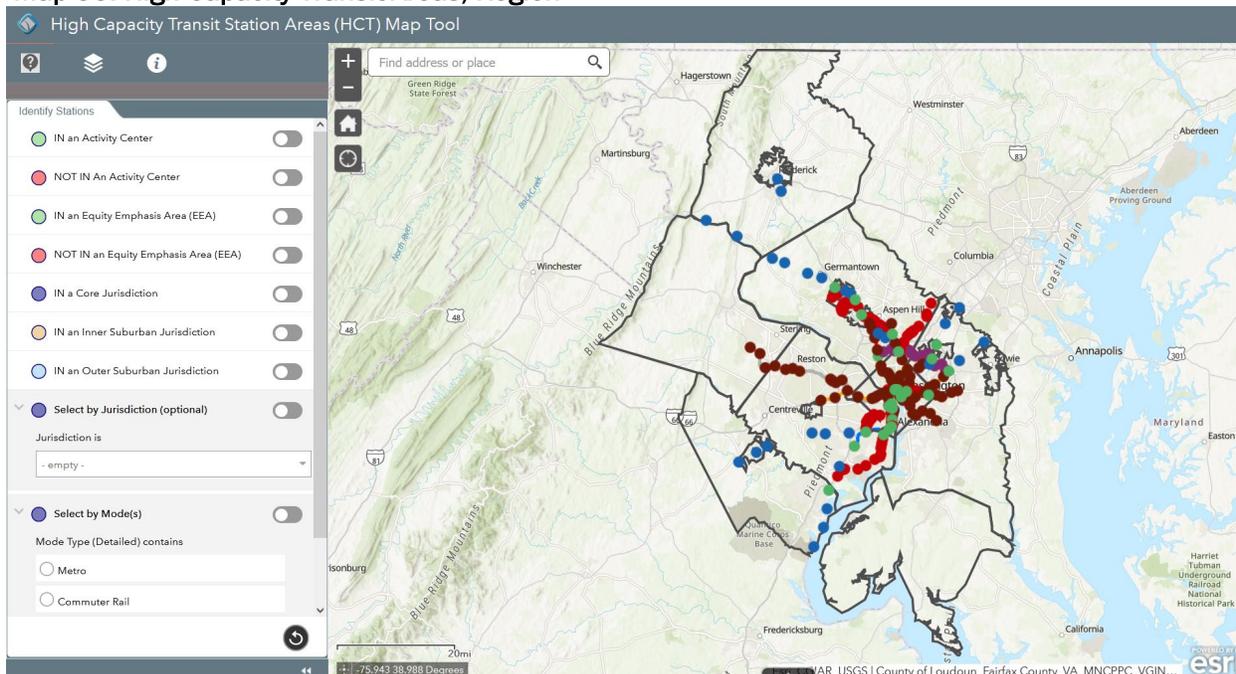
Source: D.C. Office of Planning—State Data Center, “District of Columbia, Income-Restricted Affordable Housing by ANC, 2018,” May 23, 2019 (updated August 21, 2020),

<https://public.tableau.com/app/profile/travis.pate/viz/DistrictofColumbiaIncome-RestrictedAffordableHousingbyANC/AffordableHousingANC>.

Nevertheless, the area's site-selection policies have shown improvement, especially with regard to ensuring that more affordable housing units are located near transit. Arlington County has been particularly successful in this regard. Since 2000, 75 percent of all new residential units built in Arlington County were within the Rosslyn-Ballston and Jefferson Davis Metro corridors and only 6 percent were single-family detached homes or townhouses.³⁷⁹ Additionally, the Metropolitan Washington Council of Governments (COG) has emphasized the need to build affordable housing units near public transit in the region as a whole. The Regional Housing Initiative, which was passed by the COG in 2019, calls for at least 75 percent of the proposed 320,000 affordable housing units to be located in activity centers or near high-capacity transit. You can find the high-capacity transit areas anticipated in the region by 2030 below.³⁸⁰ These efforts, combined with D.C. Mayor Muriel Bowser's initiative to create 12,000 affordable units that are dispersed throughout all eight wards,³⁸¹ represent positive steps to making the region's site-selection policies more equitable. However, until every part of the metropolitan area prioritizes the need to locate affordable housing in neighborhoods with ample

access to transit and opportunity, these efforts will likely fall short in ultimately achieving their intended effect.

Map 95: High Capacity Transit Areas, Region



As for other programs, however, only the District offers housing construction incentives by way of a QAP. Presently, the District’s Department of Housing and Development offers new construction and rehabilitation projects a 9 percent fixed tax credit if they are placed in service after July 30, 2008, and a 4 percent fixed tax credit if they are financed with tax exempt bonds under Internal Revenue Code Section 103 or involve the acquisition of existing buildings. Developers can earn a boost of up to 30 percent if their project is located in an area with residents earning 60 percent of the AMI or that has a poverty rate of at least 25 percent.³⁸² As noted previously, however, neither Virginia nor Maryland incentivize developers with financial credits laid out in QAPs.

Source-of-Income Discrimination

The District of Columbia, Maryland, and Virginia all have districtwide/statewide statutes prohibiting source-of-income discrimination.³⁸³ Montgomery County also has local laws prohibiting source-of-income discrimination, while Virginia provides statewide incentives (in the form of tax credits) to promote acceptance of HCVs.

Nonetheless, source-of-income discrimination remains a significant problem in the metropolitan Washington region, as demonstrated by several recent lawsuits. For example, *Lundregan v. Housing Opportunities Commission*, a 2020 case brought before the US District Court of Maryland, alleged that the Montgomery County Housing Opportunities Commission, a government-supported affordable housing agency, housing finance agency, and housing developer, discriminated against the plaintiff because she uses housing vouchers. Similarly, in 2021, the ERC and a local renter filed a suit in the US District Court for the District of Columbia against Vaughan Place Apartments for the latter’s refusal to accept housing vouchers as a source of income to pay the renter’s rent.³⁸⁴ Many other cases have alleged discriminatory acts by landlords, property management companies, and government agencies against tenants who use housing vouchers, even if such discrimination may not be solely or primarily

due to the housing vouchers. Such cases reveal the continued prevalence of source-of-income discrimination in the metropolitan Washington region despite its de facto illegality.

State or Local Laws, Policies, or Practices That Discourage Individuals with Disabilities from Living in Apartments, Family Homes, Supportive Housing, and other Integrated Settings

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings are a significant contributing factor to fair housing issues for persons with disabilities.

The D.C. Human Rights Act of 1977 explicitly protects individuals with disabilities from experiencing housing discrimination,³⁸⁵ yet individuals with disabilities continue to face housing obstacles in the District in a myriad of ways.

The ERC conducted a civil rights investigation in 2019 with the goal of capturing “the potential barriers that person with disabilities face when seeking housing both in person and online.” Of the 23 District properties that were examined by the ERC, 16 were found to violate the standards set in the Fair Housing Design Manual, and 51 violations were reported in total. Violations included inaccessible public and common use areas (25), unusable kitchens and bathrooms (19), inaccessible entrances on accessible routes (4), unusable doors (1), inaccessible routes into and through covered units (1), and unreinforced walls in bathrooms for later installation of grab bars (1). An analysis of property websites and online applications also revealed several ways in which individuals with disabilities face barriers when attempting to find affordable, accessible housing online. Of the 25 websites that were examined on a desktop computer, 21 posed accessibility issues to individuals with disabilities. In these instances, mandatory fields involving interactive calendars, combo boxes, and drop-down menus could not be accessed by screen readers, thus making it impossible for visually impaired users to determine how many units were available, filter results, and find other information. Screen readers could also not access 13 of the 16 online renter applications, with the biggest accessibility issues arising from inclusion of CAPTCHA requirements or mandatory fields that could not be understood by screen readers. As more and more rental properties come to rely on online applications, virtual walkthroughs, and their websites as a whole in order to find potential renters, it is crucial that these websites are accessible to all individuals with disabilities.³⁸⁶

Though the ERC’s investigation only examined rental properties in the District, similar barriers can no doubt be found at properties across the region. To date, neither the District, Virginia, nor Maryland have passed policies requiring property websites to be accessible to individuals with disabilities. In order to eliminate the barriers that these individuals may face, the region must do a better job of ensuring that properties both follow ADA and Federal Housing Administration guidelines and build accessible websites for those who need them.

In Maryland, a 21,000-person waiting list for Medicaid waivers that help individuals afford at-home care also discourages individuals with disabilities from living in apartments, family homes, supportive housing, and other integrated settings. This waiting list, among the longest in the country, means that many persons with disabilities will never have the opportunity to receive care that would allow them to continue to reside at home or with family members. If one does get off this waiting list, it often takes years. A family from Towson, Maryland, for instance, received news that their son had gotten off the waiting list nine years after they signed up for the waiver program. The length of the waiting list poses a significant burden to the family members of individuals with disabilities, who often forgo wages in order to care for their loved ones, as well as individuals with disabilities themselves. Individuals who cannot afford at-home care are thus moved out of their apartments and family homes into retirement homes, often without much choice.³⁸⁷

Unresolved Violations of Fair Housing or Civil Rights Law

Unresolved violations of fair housing law are not a significant contributing factor in the region. In September, the District filed three lawsuits alleging housing discrimination against seven real estate companies and individuals operating in the District.³⁸⁸ In February, D.C. Attorney General Karl Racine announced a lawsuit was filed against a Virginia-based moving company for rejecting reservations for rental moving boxes from applicants living in Wards 7 and 8. He also announced a settlement with a Maryland home-improvement company that refused to operate east of the Anacostia.³⁸⁹

Outside the District, the Virginia Office of Attorney General recently resolved an investigation into Loudoun County Public Schools (LCPS). The NAACP filed a complaint with the office in 2019 alleging that the school system failed to admit Black students to the school district's advanced STEM program on the basis of race. After concluding the school district's policies and practices do discriminate against Black and Latino students, LCPS agreed to revise its outreach and recruitment plans and its admissions criteria for the advanced programs. LCPS also agreed to revise its nondiscrimination policies, annually review its protocol for handling hate speech, and hire a consultant approved by the Office of Civil Rights.³⁹⁰

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