

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Greater Attleboro/Taunton HOME Consortium

**(Taunton, Attleboro, Berkley, Carver, Dighton, Freetown, Lakeville,
Mansfield, Middleboro, North Attleboro, Norton, Plainville, Raynham, and
Seekonk)**



GATHC

Greater Attleboro/Taunton
HOME Consortium



**City of Taunton Office of Economic and Community Development and the
Lawyers' Committee for Civil Rights Under Law**

February 22, 2019

TABLE OF CONTENTS

I. Cover Sheet

II. Executive Summary

III. Glossary

IV. Community Participation Process

V. Assessment of Past Goals and Actions

VI. Fair Housing Analysis

A. Demographic Summary

B. General Issues

i. Segregation/Integration

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

iii. Disparities in Access to Opportunity

iv. Disproportionate Housing Needs

C. Publicly Supported Housing Analysis

D. Disability and Access Analysis

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

VII. Fair Housing Goals and Priorities

II. Executive Summary

The Greater Attleboro/Taunton HOME Consortium's Analysis of Impediments to Fair Housing Choice (AI) is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the Consortium's obligation to affirmatively further fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with the Consortium and with input from a wide range of stakeholders through a community participation process, prepared this AI. To provide a foundation for the conclusions and recommendations presented in this AI, the Lawyers' Committee reviewed and analyzed the following:

- Data from the U.S. Census Bureau and other sources about the demographic, housing, economic, and educational landscape of the Consortium, nearby communities, and the broader region;
- Various county planning document and ordinances;
- Data reflecting housing discrimination complaints;
- The input of a broad range of stakeholders that deal with the realities of the housing market and the lives of members of protected classes in the Consortium.

The AI draws from these sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in the Consortium as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

Overview of the Greater Attleboro/Taunton HOME Consortium

The Taunton Consortium, which includes the cities of Taunton and Attleboro, and the towns of Berkley, Carver, Dighton, Freetown, Lakeville, Mansfield, Middleboro, North Attleboro, Norton, Plainville, Raynham, and Seekonk, is a mostly suburban and rural area with a predominantly white population. Over time, the share of minority groups in the area has increased, with Hispanics making up the largest group. Segregation levels of these minority groups are not high, with most minority groups clustering in the population centers of the Consortium such as Taunton and Attleboro.

According to U.S. Census data, the demographics of the Taunton Consortium have undergone significant change since 1990 to 2010. Every racial group has grown in raw numbers, but the White population share has decreased over time, with corresponding dramatic changes to the Hispanic, Black, Asian or Pacific Islander, and Native American populations. The White population increased between 1990 and 2010 (in numbers but not percentage), from 217,581

(95.23% of the total population) to 245,647 (89.86% of the total population) for White residents. Meanwhile, the Black, Hispanic, Asian or Pacific Islander, and Native American populations all grew notably during the same time period.

In the Consortium, Hispanic households and non-family households face the highest incidence of housing problems among groups for which there is a significant population, followed by Black households and large families with five or more members. White households and small families encounter the lowest rates of housing problems. This holds true for the cities of both Taunton and Attleboro.

Within the Consortium, White residents are more likely to live in public housing and Project-Based Section 8 while Black and Hispanic residents are more likely to utilize Housing Choice Vouchers to access housing. Asians and Pacific Islanders access publicly supported housing at very low rates across program types. The same pattern holds for the cities of both Taunton and Attleboro.

According to the 2012-2016 American Community Survey (ACS) 5-Year Estimates, 14,652 residents of the Taunton Consortium have ambulatory disabilities, which represents 5.3% of the Consortium's population; 9,846 residents have hearing disabilities; and 5,030 residents have vision disabilities. Approximately seventeen percent (17.4%) of people with disabilities have incomes below the poverty line, as opposed to 6.3% of individuals without disabilities. The supply of affordable, accessible units in both the Taunton Consortium and the region is insufficient to meet the needs of this population/demographic grouping.

Contributing Factors to Fair Housing Issues

In the course of the AI process, the following contributing factors were identified.

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes
7. Availability, type, frequency, and reliability of public transportation
8. Community opposition
9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs
16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services

19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods
27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing
33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law

Proposed Goals and Actions

To address the contributing factors described above, the AI plan proposes the following goals and strategies.

1. Promote reforms to current zoning regulations including the development of mandatory inclusionary zoning policies and increased residential density to support the production of affordable housing in high opportunity neighborhoods.
2. Create awareness of the availability of HUD sponsored Fair Housing webinars and other informational material for all housing authorities in the Consortium to ensure that they are following HUD's Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions that was issued on April 4, 2016.

3. Work with local agencies and relevant municipal departments to consider strengthening code enforcement and increasing penalties for repeat violators in order to reduce displacement of low- and moderate-income residents.
4. Advocate for additional bus routes in underserved areas that are increasing the amount of land zoned for multifamily housing to increase both ridership and rental housing opportunities.
5. Promote adoption of Small Area Fair Market Rents for the Housing Choice Voucher program where not currently in use.
6. Work to increase the supply of permanent supportive housing for people with disabilities, in general, and people with disabilities who are at risk of unnecessary institutionalization, in particular.
7. Encourage public housing authorities to create waiting list preferences for both the Housing Choice Voucher program and for public housing for persons with disabilities who are exiting institutions or are at risk of institutionalization.
8. Encourage housing developers to create affirmative marketing plans aimed at soliciting tenants outside the Consortium with the aim of expanding housing choices of persons who are members of protected classes.
9. Encourage fair housing awareness and training for landlords on Massachusetts' Source of Income Discrimination protections to reduce the number of voucher holders turned away.
10. Increase the awareness of Fair Housing issues for Consortium members and reinforce the commitment to implement the recommendations and goals created through the AI and Consolidated Plan process.

The AI lays out a series of achievable action steps that will help the Consortium to not only meet its obligation to affirmatively fair housing but also allow it to become a model for equity and inclusion in the region.

Glossary

Accessibility: whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment.

Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers. See: TTY

Affirmatively Further Fair Housing (AFFH): a requirement under the Fair Housing Act that local governments take steps to further fair housing, especially in places that have been historically segregated. See: Segregation

American Community Survey (ACS): a survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

Americans With Disabilities Act (ADA): federal civil rights law that prohibits discrimination against people with disabilities.

Annual Action Plan: an annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan. See also: Consolidated Plan

CDBG: Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement

Census Tract: small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

Consent Decree: a settlement agreement that resolves a dispute between two parties without admitting guilt or liability. The court maintains supervision over the implementation of the consent decree, including any payments or actions taken as required by the consent decree.

Consolidated Plan (Con Plan): a plan that helps local governments evaluate their affordable housing and community development needs and market conditions. Local governments must use their Consolidated Plan to identify how they will spend money from HUD to address fair housing and community development. Any local government that receives money from HUD in the form of CDBG, HOME, ESG, or HOPWA grants must have a Consolidated Plan. Consolidated Plans are carried out through annual Action Plans. See: Annual Action Plan, CDBG, HOME, ESG.

Consortium: in this analysis, the terms “the Consortium” and “the Taunton Consortium” are used interchangeably. The Consortium refers to the cities of Taunton and Attleboro, and the towns of Berkley, Carver, Dighton, Freetown, Lakeville, Mansfield, Middleboro, North Attleboro, Norton, Plainville, Raynham, and Seekonk.

Continuum of Care (CoC): a program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals, and optimize self-sufficiency among individuals and families experiencing homelessness.

Data and Mapping Tool (AFFHT): an online HUD resource that combines Census data and American Community Surveys data to generate maps and tables evaluating the demographics of an area for a variety of categories, including race, national origin, disability, Limited English Proficiency, housing problems, environmental health, and school proficiency, etc.

De Facto Segregation: segregation that is not created by the law, but which forms a pattern as a result of various outside factors, including former laws.

De Jure Segregation: segregation that is created and enforced by the law. Segregation is currently illegal.

Density Bonus: an incentive for developers that allows developers to increase the maximum number of units allowed at a building site in exchange for either affordable housing funds or making a certain percentage of the units affordable.

Disparate Impact: practices in housing that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

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 with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city's Black/White Dissimilarity Index was 65, then 65% of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

Emergency Solutions Grant (ESG): Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless

Entitlement Jurisdiction: a local government that is qualified to receive funds from HUD to be spent on housing and community development. See also: HUD Grantee

Environmental Health Index: a HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

Environmental Justice: the fair treatment and meaningful involvement of all people, especially minorities, in the development, implementation, and enforcement of

environmental laws, regulations, and policies. In the past, environmental hazards have been concentrated near segregated neighborhoods, making minorities more likely to experience negative health effects. Recognizing this history and working to make changes in future environmental planning are important pieces of environmental justice.

Exclusionary Zoning: the use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for low-income people. A city with exclusionary zoning might only allow single-family homes to be built in the city, excluding people who cannot afford to buy a house.

Exposure Index: a measurement of 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.

Fair Housing Act: a federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

Federal Uniform Accessibility Standards (UFAS): a guide to uniform standards for design, construction, and alternation of buildings so that physically handicapped people will be able to access and use such buildings.

Free Appropriate Public Education (FAPE): under both the Rehabilitation Act of 1973 and the Individuals with Disabilities Education Act (IDEA), all children have a right to a Free Appropriate Public Education, taking special account of any disability-related needs the child may have.

Gentrification: the process of renovating or improving a house or neighborhood to make it more attractive to middle-class residents. Gentrification often causes the cost of living in the neighborhood to rise, pushing out lower-income residents and attracting middle-class residents. Often, these effects which are driven by housing costs have a corresponding change in the racial demographics of an area.

High Opportunity Areas/Low Opportunity Areas: High Opportunity Areas are communities with low poverty, high access to jobs, and low concentrations of existing affordable housing. Often, local governments try to build new affordable housing options in High Opportunity Areas so that the residents will have access to better resources, and in an effort to desegregate a community, as minorities are often concentrated in low opportunity areas and in existing affordable housing sites.

HOME Investment Partnership Program: The HOME Program provides grants to qualifying States and localities that communities use (often in partnership with nonprofits) to fund activities such as building, buying, and/or rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to low-income people.

Housing Choice Voucher (HCV)/Section 8 Voucher: a HUD voucher issued to a low-income household that promises to pay a certain amount of the household's rent. Prices are set based

on the rent in the metropolitan area, and voucher households must pay any difference between the rent and the voucher amount. Voucher holders are often the subject of source of income discrimination. See also: Source of Income Discrimination.

Housing Discrimination: the refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lendee based on that person's race, class, sex, religion, national origin, or familial status.

HUD Grantee: a jurisdiction (city, country, consortium, state, etc.) that receives money from HUD. See also: Entitlement Jurisdiction

Inclusionary Zoning: a zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

Individualized Education Program (IEP): a written document that is developed for each public school child who is eligible for special education to plan how special accommodations will be made for the child to allow them the best possible education for their needs.

Individuals with Disabilities Education Act (IDEA): a federal civil rights law that ensures students with a disability are provided with Free Appropriate Public Education that is tailored to their individual needs.

Integration: the process of reversing trends of racial or other segregation in housing patterns. Often, segregation patterns continue even though enforced segregation is now illegal, and integration may require affirmative steps to encourage people to move out of their historic neighborhoods and mix with other groups in the community.

Isolation Index: a measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80% isolation index value for White people would mean that the population of people the typical White person is exposed to is 80% White.

Jobs Proximity Index: a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

Labor Market Engagement Index: a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

Limited English Proficiency (LEP): residents who do not speak English as a first language, and who speak English less than "very well"

Local Data: any data used in this analysis that is not provided by HUD through the Data and Mapping Tool (AFFHT), or through the Census or American Community Survey

Low Income Housing Tax Credit (LIHTC): provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

Low Poverty Index: 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 (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood. See also: Temporary Assistance for Needy Families (TANF).

Low Transportation Cost Index: a HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50% of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

Market Rate Housing: housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

Massachusetts Rental Voucher Program (MRVP): tenant and project-based rental subsidies that help subsidize the rent of low-income families. This state program closely tracks the federal HUD equivalents of Section 8 Vouchers and Project-Based Section 8 Vouchers.

NIMBY: Not In My Back Yard. A social and political movement that opposes housing or commercial development in local communities NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to small town quality to, in some cases, thinly-veiled racism.

Poverty Line: the minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. The US poverty line for a family of 4 with 2 children under 18 is currently \$22,162.

Project-Based Section 8: a government-funded program that provides rental housing to low-income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

Publicly Supported Housing: housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

Reasonable Accommodation: a change to rules, policies, practices, or services which would allow a handicapped person an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the handicapped person to have equal use and enjoyment of the housing.

R/ECAPs: Racially and Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50% Non-White residents, and 40% or more of the population is in poverty OR where the poverty rate is greater than three times the

average poverty rate in the area. In the HUD Data and Mapping Tool (AFFHT), R/ECAPS are outlined in pink. See also: Census Tract

Region: the Taunton Consortium is located within the HUD-designated Taunton Consortium Custom Region, which covers Bristol, Plymouth, and Norfolk Counties. However, the individual CDBG jurisdictions of Attleboro and Taunton are actually part of the Providence-Warwick, RI-MA Region. Both Regions are used in this analysis but are always clearly delineated by name and with maps.

Section 504 of the Rehabilitation Act: a federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

School Proficiency Index: a HUD calculation based on performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the number, the higher the school system quality is in a neighborhood.

Segregation: the illegal separation of racial or other groups in the location of housing and neighborhoods. Segregation can occur within a city or town, or in comparing multiple cities. Even though segregation is now illegal, often, housing continues to be segregated because of factors that make certain neighborhoods more attractive and expensive than others, and therefore more accessible to affluent White residents. See also: Integration.

Source of Income Discrimination: housing discrimination based on whether a potential tenant plans to use a Housing Choice Voucher/Section 8 Voucher to pay part of their rent. Source of income discrimination is illegal under Massachusetts state law. See also: Housing Choice Voucher/Section 8 Voucher.

Superfund Sites: any land in the U.S. that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment

Supplemental Security Income (SSI): benefits paid to disabled adults and children who have limited income and resources, or to people 65 and older without disabilities who meet the financial limits.

Temporary Assistance to Needy Families (TANF): a federal program that assists families with children the parents and other responsible relatives cannot provide for the family's basic needs. The program is run through grants to States.

Testers: people who apply for housing to determine whether the landlord is illegally discriminating. For example, Black and White testers will both apply for housing with the same landlord, and if they are treated differently or given different information about available housing, their experiences are compared to show evidence of discrimination.

Transit Trips Index: a HUD calculation that estimates transit trips taken for a family of 3, with a single parent, with an income of 50% of the median income for renters for the region. The higher the number, the more likely residents in that neighborhood utilize public transit.

TTY/TDD: Text Telephone/Telecommunication Device for the Deaf. TTY is the more widely used term. People who are deaf or hard of hearing can use a text telephone to communicate with other people who have a TTY number and device. TTY services are an important resource for government offices to have so that deaf or hard of hearing people can easily communicate with them.

Unbanked: not served by a financial institution.

Underbanked: an area that does not have enough banks to meet market demand

Violence Against Women Act (VAWA): a federal law protecting women who have experienced domestic and/or sexual violence. The law establishes several programs and services including a federal rape shield law, community violence prevention programs, protections for victims who are evicted because of events related to domestic violence or stalking, funding for victim assistance services, like rape crisis centers and hotlines, programs to meet the needs of immigrant women and women of different races or ethnicities, programs and services for victims with disabilities, and legal aid for survivors of domestic violence.

White Flight: white families that moved from cities to suburbs in response to desegregation.

III. COMMUNITY PARTICIPATION PROCESS

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

In order to ensure that the analysis contained in an AI truly reflects conditions in a community and that the goals and strategies are targeted and feasible, the participation of a wide range of stakeholders is of critical importance. A broad array of outreach was conducted through community meetings, focus groups, and public hearings.

In preparing this AI, the Taunton Consortium and the Lawyers' Committee reached out to tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal services providers, social services providers, housing developers, and industry groups to hear directly about fair housing issues affecting residents of the Consortium.

In August 2018, the following focus groups were held: HOME Consortium members; Housing Authorities; Developers and Landlords: CHDOs, Landlords and Realtors: Social Services Providers: and Housing and Homelessness organizations.

Public hearings were held in Taunton on December 11, 2018 and in Attleboro on December 12, 2018. No public comments were received during the 30-day comment process.

IV. ASSESSMENT OF PAST GOALS, ACTIONS AND STRATEGIES

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

The goal articulated in the most recent Analysis of Impediments in 2010 was to create a resource that provides information, education, and training to the real estate industry, financial institutions, and individual households.

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

In PY11, the City of Taunton's Office of Economic and Community Development (OECD) held two Fair Housing outreach and awareness educational seminars. One seminar targeted the business community (primarily lenders) and property owners and the other targeted realtors.

During the same year OECD contracted with Pro-Home Inc., a local non-profit housing agency to conduct a Fair Housing seminar targeting low- and moderate-income residents.

During PY11-12 OECD obtained a Section 108 loan in the amount of \$2M to assist the local housing authority demolish, rebuild and decentralize an outdated public housing complex through a \$22M HOPE VI award the housing authority received from HUD. As part of that project there were many requirements addressed in regard to Fair Housing issues.

Relocation of the residents was done with the assistance of HUD staff to address the varied needs and desires of those being either temporarily or permanently displaced. Meetings were conducted with residents to inform them of Fair Housing Choice issues and options as they moved forward with the relocation process. The housing authority followed the principles and factors of The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and HOPE VI relocation guidelines to guide its decisions during the relocation process. Section 3 job opportunities were also implemented as well as meeting the requirement of one for one replacement of existing units.

To promote homeownership in Taunton, \$300,000 in HOPE VI funds were also set aside to assist 30 potential first-time homebuyers, including participants in the THA's Family Self-Sufficiency/Section 8 to Homeownership Program, as well as other low-to moderate-income THA residents and first-time homebuyers from the community. The Consortium provides down payment and closing assistance annually through the HOME Program.

The THA also committed to become a more diversified organization by setting a goal of a 20-25% (currently 20%) minority employee ratio and bring on additional bi-lingual staff to better serve the minority population.

During program years 11,12,13, OECD funded a public services activity that focused on housing counseling services, including financial counseling, foreclosure counselling and intervention as well as Fair Housing issues and complaints.

Beginning in PY14, OECD has and continues to fund a public services activity with South Coast Counties Legal Services (SCCLS). Since July 1, 2014, SCCLS has received annual funds to provide low and moderate Taunton residents with full legal services in fair housing matters and in situations related to poor living conditions. As of November 1, 2018, SCCLS has assisted a total of 72 individuals or families. In addition to providing full legal services, SCCLS conducts a minimum of two fair housing workshops per year in Taunton on the topic of tenants' rights to decent living conditions. The workshops cover such issues as the state's sanitary code, the landlord's responsibilities to make improvements, guidance on what tenants can do if landlords do not undertake the required correction, and potential actions landlords may take in cases where a tenant is seeking remediation of unsafe living conditions. SCCLS provides these same free services to low- and moderate-income residents throughout the Consortium region in both Bristol and Plymouth counties with funding from various sources.

The local non-profit that provides housing counseling also conducts pre-purchase and post-purchase counseling as part of its first-time homebuyer assistance program. The pre-purchase classes are conducted on an average of fifteen times per year and post-purchase classes are conducted on average of six times per year. Fair housing issues and awareness are a topics covered in both classes.

V. FAIR HOUSING ANALYSIS

A. Demographic Summary

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

Please note that the terms African-American and Black are used interchangeably in this document. Also, White and Non-Hispanic White are used interchangeably in this document.

According to U.S. Census data, the demographics of the Taunton Consortium have undergone significant change since 1990 to 2010. Every racial group has grown in raw numbers, but the White population share has decreased over time, with corresponding dramatic changes to the Hispanic, Black, Asian or Pacific Islander, and Native American populations. The White population increased between 1990 and 2010 (in numbers but not percentage), from 217,581 (95.23% of the total population) to 245,647 (89.86% of the total population) for White residents. Meanwhile, the Black, Hispanic, Asian or Pacific Islander, and Native American populations all grew notably during the same time period.

In 2016, the population of the Taunton Consortium grew from 2010 levels, to around 279,650 residents. Ethnic and racial diversity percentages stayed roughly the same for White, Black, and Asian or Pacific Islanders, but with a significant rise in the number of Hispanic people, and a plummeting change in the number of Native Americans since 2010; however, the larger trend has seen non-white group percentages all increase, while white has decreased, since 1990.

Overall Population – Demographic Trends

- In the Taunton Consortium, the overall population has increased since 1990.
- The overall population in 1990 was 227,347.
- In 2000, the overall population was 256,834, an increase of 29,487 or 13% since 1990.
- In 2010, the overall population was 271,176, a modest increase over 2000 of 14,342 or 5.6%. The diversity of the population saw its greatest increases during this time.
- In 2016, the population was estimated at 279,650, an increase of 8,474 or approximately 3.12% in six years.
- The overall population of the region was 1,545,173 in 1990.
- In 2000, the population of the region increased by 82,619 people to 1,627,792, an increase of 5.3%--a smaller percentage increase in the region than in the Taunton Consortium itself.
- In 2010, the population of the region increased by 59,679 to 1,687,471 or 3.7%--a smaller rate of growth than the prior ten years.
- In 2017, the estimated population of the region was 1,776,947, an increase of 89,476 or 5.3%.

Taunton Consortium (1990-2000)

- From 1990 to 2000, the number and percentage of non-Hispanic White (White) residents increased from 217,581 (95.23% of the total population) to 241,275 (92.88% of the total population), an increase of 23,694 or 9.8%.
- From 1990 to 2000, the number and percentage of Hispanic residents increased from 4,717 (2.06% of the total population) to 5,663 (2.18% of the total population), an increase of 946 or 20%.
- The Black population increased from 2,543 (1.11% of the total population) to 4,721 (1.82% of the total population), an increase of 2,178 or 86%.
- The Asian or Pacific Islander population increased from 2,156 (0.94% of the total population) to 4,131 (1.59% of the total population), an increase of 1,975 or 91.6%.
- The Native American population increased from 350 (0.15% of the total population) to 1,044 (0.4% of the total population), an increase of 694 or 198%. While the percentage increase is significant, the number of new Native American residents is still very small to that of other racial and ethnic groups.

Taunton Consortium (2000-2010)

- From 2000 to 2010, the number but not the percentage of the White population increased from 241,275 (92.88% of the total population) to 245,647 (89.86% of the total population), an increase of 4,372 or 1.81%.
- The Hispanic population grew most dramatically from 2000 to 2010. In 2000, the Hispanic population was 5,663 (2.18% of the total population), and, by 2010, the Hispanic population was 8,895 (3.25% of the total population), an increase of 3,232 or 57%.
- The Black population also dramatically increased, with 4,721 residents in 2000 (1.82% of the total population) and 8,501 residents (3.11% of the total population) in 2010, an increase of 3,780 or 80%.
- Similarly, the Asian or Pacific Islander population grew rapidly, starting with 4,131 (1.59% of the total population) in 2000 and closing out the decade with 6,878 (2.52% of the total population), an increase of 2,747 or 66.5%.
- The Native American population increased from 1,044 (0.40% of the total population) to 1,255 (0.46% of the total population), an increase of 211 or 20.2%.

Taunton Consortium (2010-2016)

- The most up-to-date demographic data for the Taunton Consortium that disaggregates the population by race and ethnicity is from the 2012-2016 American Community Survey 5-Year Estimates.
- Between 2010 and 2016, the White population increased slightly in number but fell in percentage, from 245,647 (89.86% of the population) to 248,381 (88.8% of the population), an increase of 2,734 or 1.1%.
- The Hispanic population registered a modest increase from 8,895 (3.25% of the population) to 10,035 (3.59% of the population), a jump of 1,140 or 12.8%.

- The Black population fell slightly, dropping from 8,501 (3.11% of the total population) to 8,397 (3.0% of the total population), a decrease of 104 or 1.2%.
- The Asian or Pacific Islander population increased minutely from 6,878 (2.52% of the total population) to 6,903 (2.47% of the total population), an increase of 25 or 0.3%.
- The Native American population plummeted from 1,255 (0.46% of the total population) to 69 (0.16% of the total population), a decrease of 1,186 or 94.5%.

Taunton Consortium Custom Region (1990-2000)

In this analysis, the Taunton Consortium Custom Region refers to a special, HUD-defined region that perfectly overlaps with the counties of Bristol, Plymouth, and Norfolk.

- Demographic changes in the region from 1990 to 2000 followed similar patterns to those in the Taunton Consortium, with the number of White residents increasing but the percentage of White residents decreasing. The numbers and the percentages of Black, Hispanic, Asian or Pacific Islander, and Native American residents all increased, and some increased quite dramatically.
- The White population of the metropolitan region increased in numbers but decreased in proportion, from 1,452,724 (93.25% of the total population) to 1,463,762 (88.28% of the population), an increase of 11,038 or 0.8%.
- The Hispanic population grew from 31,382 (2.01% of the total population) to 42,660 (2.57% of the total population), a significant increase of 11,278 or 36%.
- The Black population grew from 33,549 (2.15% of the total population) to 63,038 (3.80% of the total population), a significant increase of 29,489 or 88%.
- The Asian or Pacific Islander population jumped significantly from 25,293 (1.62% of the total population) to 52,247 (3.15% of the total population), an increase of 26,954 or 107%.
- The Native American population also increased from 2,225 (0.14% of the total population) to 6,085 (0.37% of the total population), a jump of 3,860 or 173%. Despite the significant increase in real numbers for Hispanics, African Americans, Asian or Pacific Islanders, and Native Americans, these racial groups remained a small proportion of the total population in the metropolitan area.

Taunton Consortium Custom Region (2000-2010)

- In the metropolitan area, raw numbers and population shares did not follow the same trends exhibited by the Taunton Consortium. Overall, however, both the region and the Consortium experienced strong growth in its minority populations.
- The White population decreased in the Region while it increased in the Taunton Consortium. The White population dropped from 1,463,762 (88.28% of the total population) to 1,423,443 (83.05% of the total population), a decrease of 40,319 or 27.4% (compared to an increase of 1.81% in the Taunton Consortium).
- The Hispanic population increased at a faster rate in the metropolitan area than in the Taunton Consortium. The Hispanic population grew from 42,660 (2.57% of the total population) to 70,643 (4.12% of the total population), an increase of 27,983 or 65.6% (compared to 57% in the Taunton Consortium).

- The Black population increased at a slower rate in the metropolitan area than in the Taunton Consortium). The Black population increased from 63,038 (3.80% of the total population) to 103,292 (6.03% of the total population), an increase of 40,254 or 63.9% (compared to 80% in the Taunton Consortium).
- The Asian or Pacific Islander population increased at a slower rate in the metropolitan area than in the Taunton Consortium. The Asian or Pacific Islander population increased from 52,247 (3.15% of the total population) to 82,875 (4.84% of the population), an increase of 30,628 or 58.6% (compared to 66.5% in the Taunton Consortium).
- The Native American population increased at a slightly slower rate in the metropolitan area as compared to the Taunton Consortium. The Native American population increased from 6,085 (0.37% of the total population) to 7,218 (0.42% of the total population), an increase of 1,133 or 18.6% (compared to 20.2% in the Taunton Consortium).

National Origin – Demographic Trends

Taunton Consortium

- The number of foreign born residents in the Taunton Consortium rose steadily, but the proportion remained relatively the same between 1990 and 2010.
- There was a moderate increase in foreign born residents from 1990 to 2000 in real numbers, but only a tiny shift in the proportion of the total population. In 1990, foreign born residents numbered 13,732 (6.01% of the total population), and, in 2000, foreign born residents numbered 16,542 (6.37% of the total population), an increase of 2,810 or 17%.
- From 2000 to 2010, there was a minor increase in foreign-born residents from 16,542 (6.37% of the total population) to 19,951 (7.30% of the total population), an increase of 3,409 or 20.6%.
- From the 2010 Census to the 2012-2016 American Community Survey 5-Year Estimates, the foreign-born population increased slightly from 19,951 (7.30% of the total population) to 20,885 (7.5% of the total population), an increase of 934 or 4.68%.
- As of 2010, the most recent year for which this data exists, the top three countries of origin for foreign-born residents are:
 - Portugal: 6,219
 - Azores: 1,747
 - India: 1,455

Taunton Consortium Custom Region

- The proportion of foreign-born residents has been consistently higher in the Region than in the Taunton Consortium throughout the entire time period from 1990 to the 2017 American Community Survey 1-Year Estimates.
- The number and proportion of foreign-born residents increased from 135,996 (8.73% of total population) in 1990 to 169,165 (10.20% of the total population) in 2000, a jump of 33,169 or 24.4%.

- The number and proportion of foreign-born residents grew again from 2000 to 2010, from 169,165 (10.20% of the total population) to 203,981 (11.90% of the total population), an increase of 34,816 or 20.6%.
- From 2010 to the 2017 American Community Survey 1-Year Estimates, the foreign-born population grew at a similar pace with an increase of 46,760 (22.9%) from 203,981 (11.90% of the total population) to 250,741 (14.1% of the total population).
- As of 2010, the most recent year for which this data exists, the top country of origin for foreign-born residents is the same in both the Taunton Consortium and the Region. However, China (excluding Hong Kong and Taiwan) and Haiti replaced the Azores and India as numbers two and three in the top countries of origin in the Region. As of 2010, the most recent year for which this data exists, the top three countries of origin for foreign-born residents are:
 - Portugal: 39,315
 - China excluding Hong Kong & Taiwan: 18,045
 - Haiti: 13,634

Limited English Proficiency – Demographic Trends

Taunton Consortium

- From 1990 to 2012-2016 American Community Survey 5-Year Estimates, the percentage of Limited English Proficiency (LEP) residents remained nearly the same, with LEP residents making up 3.34% of the total population in 1990 and 3.57% of the total population as of the 2012-2016 American Community Survey 5-Year Estimates.
- From 1990 to 2000, the number of LEP residents increased modestly, but the proportion went down slightly from 8,417 (3.68% of the total population) to 8,683 (3.34% of the total population), a jump of 266 or 3.16%.
- From 2000 to 2010, both the number and percentage of LEP residents increased from 8,683 (3.34% of the total population) to 9,935 (3.63% of the total population), an increase of 1,252 or 14.4%.
- The number and percentage of LEP residents decreased from 2010 to the 2012-2016 American Community Survey 5-Year Estimates from 9,935 (3.63% of the total population) to 9,457 (3.57% of the total population), a drop of 478 or 4.8%.
- As of 2010, the most recent year for which this data exists, the three main languages spoken by LEP residents in the Taunton Consortium are:
 - Portuguese: 4,490
 - Spanish: 1,988
 - Chinese: 427

Taunton Consortium Custom Region

- Compared to the Taunton Consortium, the metropolitan area has had a slightly higher percentage of LEP residents from 1990 to the 2017 American Community Survey 1-Year Estimates.

- The percentage of LEP residents in the metropolitan area has remained relatively constant, ranging from 4.94% at the lowest (in 1990) to 6.23% at the highest (current percentage).
- There was a moderate increase in LEP residents from 76,983 (4.94% of the total population) in 1990 to 90,718 (5.47% of the total population) in 2000, an increase of 13,735 or 17.8%.
- From 2000 to 2010, there was a slight increase in the number and percentage of LEP residents from 90,718 (5.47% of the total population) to 102,474 (5.98% of the total population); an increase of 11,756 or 13%.
- The number and percentage of LEP residents increased more dramatically from 2010 to 2017 American Community Survey 1-Year Estimate, going from 102,474 (5.98% of the total population) to 124,480 (7.4%), an increase of 22,006 or 21.5%.
- Like in the Taunton Consortium, Portuguese, Spanish, and Chinese were the top three languages spoken by LEP residents in the metropolitan area as of 2010, the most recent year for which this data exists. The three main languages spoken by LEP people in the metropolitan area are:
 - Portuguese: 39,143
 - Spanish: 16,892
 - Chinese: 15,869

Gender – Demographic Trends

Taunton Consortium

- In 1990, the male population was slightly lower than the female population, with 110,830 (48.51% of the total population) and 117,631 (51.49%) respectively.
- Since 1990, the female population has maintained a slight, but consistent advantage over the male population.

Gender	1990	2000	2010
Male	110,830 (48.51%)	126,686 (48.77%)	133,242 (48.74%)
Female	117,631 (51.49%)	133,064 (51.23%)	140,115 (51.26%)

Taunton Consortium Custom Region

In the metropolitan area, females have constituted a slight majority over males from 1990 through to the present.

Gender	1990	2000	2010
Male	747,487 (47.99%)	797,471 (48.10%)	827,318 (48.27%)
Female	810,141 (52.01%)	860,490 (51.90%)	886,736 (51.73%)

Age – Demographic Trends

Taunton Consortium (1990-2000)

- There was a moderate increase in the number and percentage of residents under 18 during this period, from 59,018 (25.83% of the total population) to 70,145 (27% of the total population), a bump of 11,127 and 18.9%.
- There was modest growth in the number (though not the percentage) of residents age 18-64 from 143,471 (62.80% of the total population) to 160,440 (61.77% of the total population), an increase of 16,969 or 11.8%.
- Despite the slight decrease in percentage of the total population, residents age 18-64 remained the clear majority during this period.
- There was also an increase in number (though not in percentage) of residents age 65 or older from 25,972 (11.37% of the total population) to 29,166 (11.23% of the total population), a bump of 3,194 or 12.3%.

Taunton Consortium (2000-2010)

- There was a distinct decrease in the number and percentage of residents under 18 during this period, from 70,145 (27% of the total population) to 65,270 (23.88% of the total population), a drop of 4,875 or 6.9%
- At the same time, there was an increase in number and percent for both residents aged 18-64 and residents age 65 or older.
- Residents age 18-64 increased from 160,440 (61.77% of the total population) in 2000 to 173,916 (63.62% of the total population) in 2010, a jump of 13,476 or 8.4%.
- Residents aged 65 or older increased from 29,166 (11.23% of the total population) to 34,171 (12.50% of the total population), a jump of 5,005 or 17.2%.

Taunton Consortium Custom Region

- Like the Taunton Consortium, the number and percentage of residents in the metropolitan area age 18 and under grew from 1990 to 2000 and then decreased from 2000 to 2010.
 - 1990: 366,701 (23.54%)
 - 2000: 420,507 (25.36%)
 - 2010: 394,016 (22.99%)
- Like the Taunton Consortium, residents age 18-64 throughout the metropolitan area remained the clear majority from 1990 through 2010 (though the percentage dipped slightly in 2000 before recovering by 2010).
 - 1990: 980,815 (62.97% of the total population)
 - 2000: 1,012,642 (61.08% of the total population)
 - 2010: 1,076,009 (62.78% of the total population)
- Unlike the Taunton Consortium, residents in the metropolitan area age 65 or older sustained modest increases in number and percentage throughout the period from 1990 to 2010.

- 1990: 210,113 (13.49%)
- 2000: 224,811 (13.56%)
- 2010: 244,029 (14.24%)

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

In the Taunton Consortium, the vast majority of people are owners rather than renters. Predictably, the percentage of rental housing increases in the city centers of the more populous areas like Taunton and Attleboro. Rents are more concentrated in the western part of the Consortium, which is near Providence, more populous, and less rural. In the overall region, renting is far more popular outside of the Consortium, especially in Providence, Brockton, New Bedford, and Fall River.

HUD-provided data did not reflect changes in these patterns over time.

B. GENERAL ISSUES

i. Segregation/Integration

The Taunton Consortium is a mostly suburban and rural area with a predominantly white population. Over time, the share of minority groups in the area has increased, with Hispanics making up the largest group. Segregation levels of these minority groups are not high, with most minority groups clustering in the population centers of the Consortium such as Taunton and Attleboro. The following provides a detailed analysis of segregation and integration patterns and trends at the regional, Consortium, and city/town levels.

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

Dissimilarity Index

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

Table 1 Dissimilarity Index Values by Race and Ethnicity for the Taunton Consortium and Region

	CNSRT-Taunton, MA CONSORTIA Jurisdiction				CNSRT-Taunton, MA – Custom Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	2010 (block group)	1990 Trend	2000 Trend	2010 Trend	2010 (block group)
Non- White/White	27.66	26.24	25.32	30.23	40.08	44.16	42.84	47.17
Black/White	28.83	25.59	27.94	32.79	49.37	52.98	52.78	58.79
Hispanic/White	41.32	38.52	33.36	36.42	42.37	45.30	43.33	46.09
Asian or Pacific Islander/White	32.05	29.27	30.20	36.88	44.78	47.61	45.78	51.73

Source: HUD AFFH Tool Table 3 – Racial/Ethnic Dissimilarity Trends\

Table 2 Dissimilarity Index Values by Race and Ethnicity for Taunton, Attleboro, and the CDBG Region

	Taunton, MA CDBG Jurisdiction				Attleboro, MA CDBG Jurisdiction			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	2010 (block group)	1990 Trend	2000 Trend	2010 Trend	2010 (block group)
Non-White/White	21.88	22.34	21.89	26.12	33.61	29.86	19.92	24.44
Black/White	20.13	22.98	23.23	25.66	18.45	16.31	11.67	21.34
Hispanic/White	25.98	29.78	25.62	32.32	40.66	42.74	31.98	35.45
Asian or Pacific Islander/White	19.98	11.18	16.01	22.94	35.65	24.58	14.94	21.64

Providence-Warwick, RI-MA Region			
1990 Trend	2000 Trend	2010 Trend	2010 (block group)
52.70	53.73	50.22	54.42
60.20	55.36	50.81	55.43
57.82	64.47	60.11	62.09
47.07	41.23	36.60	43.74

Overall, the Taunton Consortium does not have significant levels of segregation. One commonly used metric for segregation is the Dissimilarity Index. 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, the higher the extent of the segregation. For example, if a City's Black/White Dissimilarity Index was 65, then 65% of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

In the Taunton Consortium, the Non-White/White Dissimilarity Index indicates that segregation for Non-White/White individuals is low, with prior measurements indicating that the values are slowly declining. Hispanics comprise the largest minority group in the Consortium and have historically experienced the highest levels of segregation, though currently roughly tied with Asian or Pacific Islanders. Behind Hispanics and Asian or Pacific Islander levels of segregation, which are roughly the same, Black residents experience the next highest levels of segregation. In Taunton and Attleboro, specifically, Hispanics have maintained the highest levels of segregation at every measurement.

In the region, the increasing and decreasing trends are similarly haphazard. Overall, levels of segregation in the region are moderate (although Black/White segregation is on the low end of "high"), as opposed to the low levels of segregation in the Consortium. The levels of segregation

in the region exceed the Consortium by an average of 17 points. Unlike in the Consortium, Black/White segregation is the highest, with Asian or Pacific Islanders the second most segregated and Hispanics the third most.

In addition to the Dissimilarity Index, social scientists also use the isolation and exposure indices to measure segregation. These indices, when taken together, capture the neighborhood demographics experienced, on average, by members of a particular racial or ethnic groups within a City or metropolitan area. The Isolation Index measures the extent to which minority members are exposed only to one another. Values for the Isolation Index range from 0 to 100. The Exposure Index is a group's exposure to all racial groups. Values for the Exposure Index also range from 0 to 100. A larger value means that the average group member lives in a census tract with a higher percentage of people from other group.

Table 3 Isolation Index Values by Race and Ethnicity in the Taunton Consortium

Taunton	1980	1990	2000	2010
Isolation Index				
White/White	94.4	92	90	85
Black/Black	2.1	2.2	3.8	7.4
Hispanic/Hispanic	4.2	6.4	5.5	7.1
Asian/Asian	0.2	0.6	1	1.6

Attleboro	1980	1990	2000	2010
Isolation Index				
White/White	96.1	93.7	89.7	84.6
Black/Black	0.4	1.1	2.2	3.8
Hispanic/Hispanic	4.8	5.9	9.2	10.2
Asian/Asian	0.7	4.8	5.5	5.8

Statistics are only available for the cities of Taunton and Attleboro in the Consortium. In these cities, the Isolation Index has declined for Whites while increasing for all other groups. The changes in Isolation Index values correspond with demographic shifts in the Consortium. The share of Whites in the Consortium has decreased while the raw numbers and population share of other groups have increased.

Table 4 Exposure Index

Taunton				
Exposure Index	1980	1990	2000	2010
Black/White	92.1	90.2	87.8	81.7
Hispanic/White	91.9	89.7	87.2	81
Asian/White	93	91.3	89.5	84.1
White/Black	1.3	1.7	3	5.9
Hispanic/Black	1.8	2.1	3.8	7.4
Asian/Black	1.4	1.9	3.3	6.4
White/Hispanic	2.8	4.6	3.8	5.2
Black/Hispanic	3.9	5.7	4.8	6.6
Asian/Hispanic	3.7	4.7	4	5.5
White/Asian	0.2	0.4	0.9	1.4
Black/Asian	0.2	0.5	1	1.4
Hispanic/Asian	0.2	0.4	0.9	1.4

Attleboro				
Exposure Index	1980	1990	2000	2010
Black/White	96.1	91.6	86.4	82.6
Hispanic/White	93.7	88.2	80.9	78.2
Asian/White	96.8	88.4	84.4	81.6
White/Black	0.3	0.9	1.9	3.6
Hispanic/Black	0.3	1.3	2.7	4.1
Asian/Black	0.4	1.2	2.3	3.8
White/Hispanic	2.2	2.8	3.9	5.9
Black/Hispanic	2.2	3.9	5.9	7.2
Asian/Hispanic	1.5	5.3	6.7	7.8
White/Asian	0.5	2.2	3.6	5
Black/Asian	0.6	3	4.5	5.4
Hispanic/Asian	0.4	4.3	6	6.3

Statistics are only available for the cities of Taunton and Attleboro in the Consortium. The Exposure Index values for Black/White, Hispanic/White, and Asian/White have consistently fallen over time in both Taunton and Attleboro, with corresponding rises in the index values for the other groups. There are two exceptions for the White/Hispanic and Black/Hispanic Exposure Index values from 1990 to 2000 in Taunton. The overall trend indicates that segregation levels are falling, with historically white suburban or rural census tracts increasingly integrated, even though the White Isolation Indices remain high.

Table 5 Average Census Tract Composition by Race and Ethnicity (Isolation and Exposure Indices) – Taunton and Attleboro – 2010 Census

Taunton				
Race or Ethnicity	White	Black	Hispanic	Asian or Pacific Islander
White	85	5.9	5.2	1.4
Black	81.7	7.4	6.6	1.4
Hispanic	81	7.4	7.1	1.4
Asian or Pacific Islander	84.1	6.4	5.5	1.6

Attleboro				
Race or Ethnicity	White	Black	Hispanic	Asian or Pacific Islander
White	84.6	3.6	5.9	5
Black	82.6	3.8	7.2	5.4
Hispanic	78.2	4.1	10.2	6.3
Asian or Pacific Islander	81.6	3.8	7.8	5.8

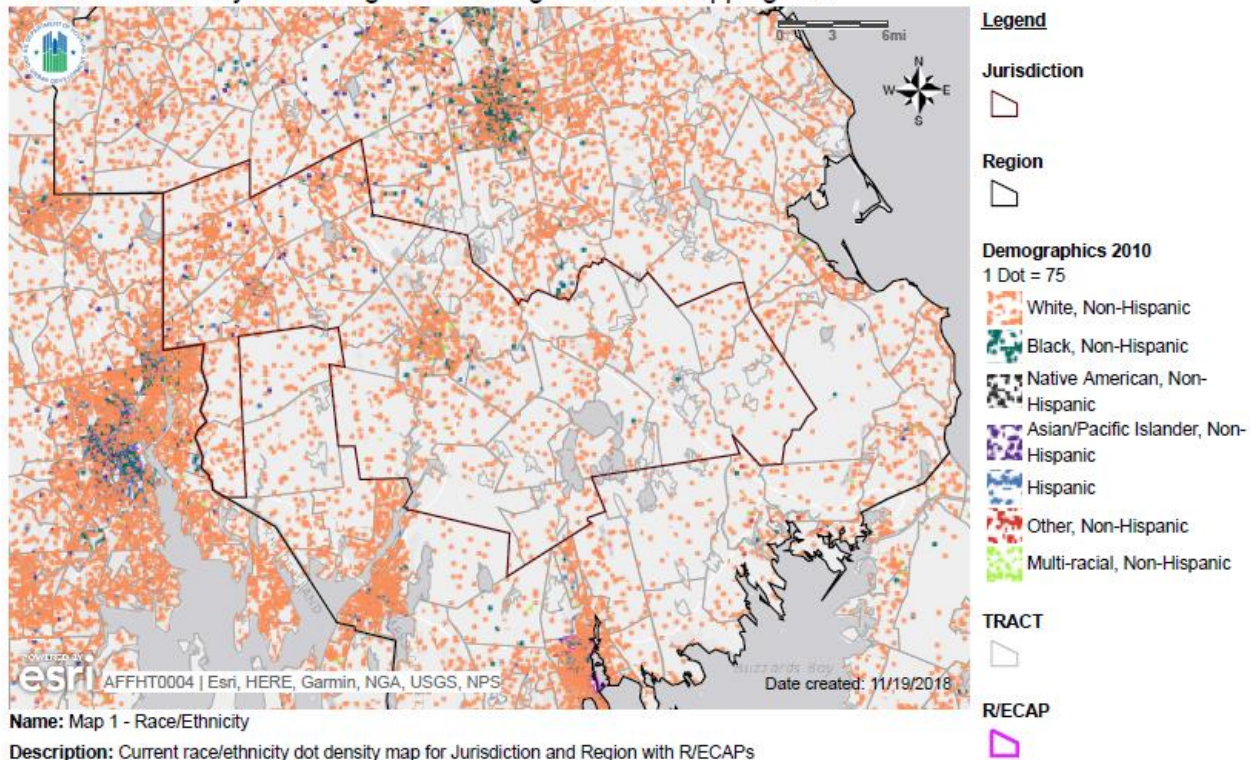
The Isolation and Exposure Indices confirm that Whites experience the highest levels of residential segregation in both Taunton and Attleboro. This is fundamentally due to the sheer number of White residents, but residential housing patterns are also to blame. The minority group that experiences the most segregation in Attleboro is Hispanics. In Taunton, Blacks and Hispanics are roughly tied in their isolation levels. In Attleboro, a typical Hispanic resident lives in a census tract that is 10.2% Hispanic, 78.2% White, 4.1% Black, and 6.3% Asian American and Pacific Islander. In Taunton, a typical Hispanic resident lives in a census tract that is 7.1% Hispanic, 81% White, 7.4% Black, and 1.4% Asian or Pacific Islander. Meanwhile, a typical Black resident sees 7.4% Black, 81.7% White, 6.6% Hispanic, and 1.4% Asian or Pacific Islander. These two breakdowns are nearly identical. Isolation levels for Hispanics in Attleboro is higher than Black residents or Hispanic residents in Taunton, and Attleboro also experiences a higher share of Asian or Pacific Islander residents but a lower share of Black residents. Exposure levels for Asian or Pacific Islanders in Attleboro are up to 4.5 times higher than in Taunton.

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.

Race/Ethnicity

Map 1: Race/Ethnicity, Taunton Consortium

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

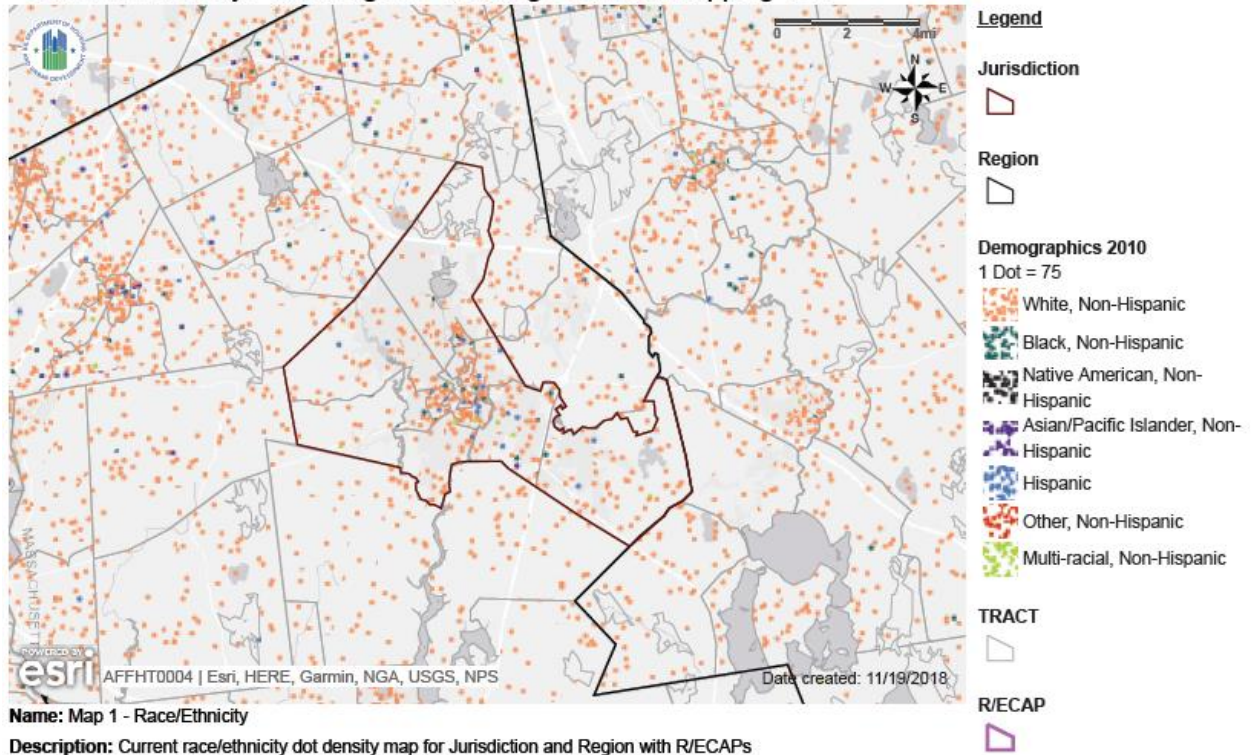
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

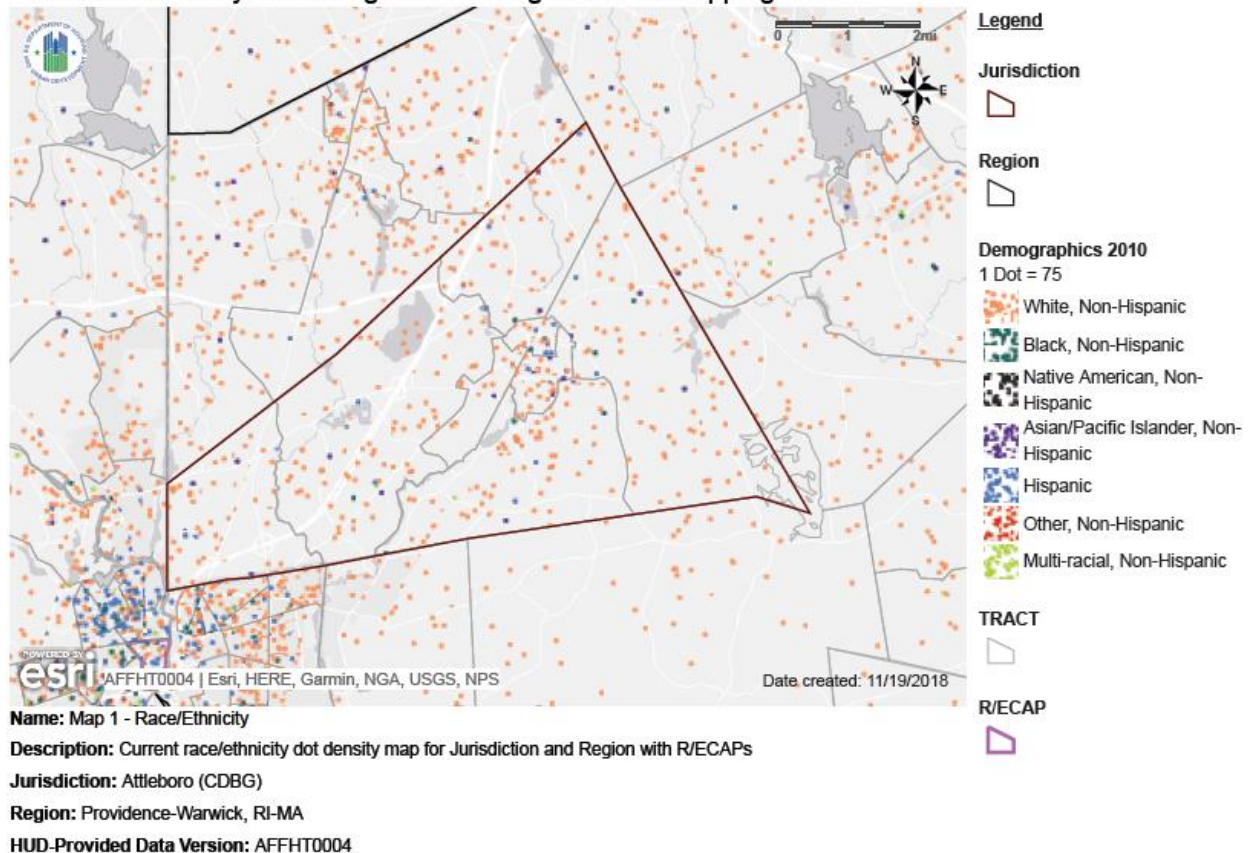
Map 2: Race/Ethnicity, Taunton, MA

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 3: Race/Ethnicity, Attleboro, MA

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Hispanics are the largest minority group in the Consortium. They are concentrated in the population centers of Taunton, Attleboro, and North Attleboro, and scattered throughout the rest of the western half of the Consortium. There is not much Hispanic presence in the eastern half of the Consortium, which is quite rural. There is also a significant concentration in the region in Brockton. Hispanics are far more concentrated in nearby Providence, RI, than anywhere in the Consortium or the region.

Black residents in the Consortium mostly gravitate toward the population centers of Taunton and Attleboro. Comparatively, there are far more significant concentrations of Black residents in the region in Providence, RI and Brockton, MA.

Within the Consortium, Asian Americans and Pacific Islanders are mostly concentrated in the western part, near the population centers of Attleboro and North Attleboro. With the close proximity to Providence, RI, it is likely that they commute into work from their homes on the western side of the Consortium. There is also a significant Asian and Pacific Islander population in Providence itself. There is a slight concentration in Mansfield (which is also near Brockton), suggesting that Asian and Pacific Islanders living there may commute into Brockton for work.

Within Attleboro itself, there is a clear preference for city-center residence among minority groups, but with very healthy distribution across other neighborhoods as well. Asian Americans and Pacific Islanders exhibit the most evenly-distributed residential patterns. Similarly in Taunton, Asian or Pacific Islanders are quite evenly distributed across the jurisdiction, without a clear concentration in the city center. Blacks and Hispanics are much more likely to be concentrated in the city center, with Black residents in particular congregating in the eastern part of Taunton as well.

Non-Hispanic White residents are by far the largest ethnic group in the Consortium and the region. They are quite evenly distributed across the Consortium, with larger concentrations in the population centers of Attleboro, North Attleboro, and Taunton, though not nearly as concentrated as in nearby Providence, RI.

Integration

The areas of the Consortium that are population centers, which tend to have the largest minority populations, are also the most integrated. In cities like Taunton and Attleboro, the share of Hispanics, African Americans, and Asians or Pacific Islanders far exceeds the average across the Consortium, with an example census tract in Attleboro home to 52.04% White, 4.81% Black, 9.95% Asian or Pacific Islander, and 29.06% Hispanic residents. Hispanic segregation levels are tied for the highest in the Consortium, and this 26 point increase in the example census tract in Attleboro demonstrates this. This is not to say that Hispanics are not well-distributed across the Consortium. The fact that Attleboro is a population center, with amenities and transportation makes it an appealing place to live for many people, explaining the nearly 8 point jump for Asian or Pacific Islanders and 2.5 point jump for African Americans in the same census tract.

In the western part of the Consortium near Providence, RI and in Mansfield (which is also near Brockton), Asian or Pacific Islanders are the dominant minority group, concentrated in North Attleboro and Attleboro but also well distributed across the more suburban areas, within commuting distance to Providence and Brockton.

Asian or Pacific Islanders have far less presence in Taunton than in Attleboro and the western part of the Consortium. An example census tract in Taunton is home to 61.46% White, 7.62% Black, 1.11% Asian or Pacific Islander, and 19.68% Hispanic residents. Compared to the Consortium at large, Black residents jumped 5 points, Hispanics jumped 16 points, and Asian or Pacific Islanders dropped by half. The Hispanic share is not as high as in the tract in Attleboro, but the Black share climbed another 3 points, or 5 points more than the average. Meanwhile, the fall in Asian or Pacific Islanders further highlights the tendency to live near Providence and Brockton in the western part of the Consortium, probably for ease of commute. This disparity suggests that there may be a higher level of education and professional experience among the Asian or Pacific Islanders that is driving these living and commute patterns.

Whites are fairly evenly distributed across the Consortium, with concentrations in cities. This is notable because the eastern part of the Consortium is mostly rural farmland, and yet distribution of residents remains similar. There is certainly a lower concentration of minorities in the eastern half of the Consortium than in the western half, which has more professional commuters.

Particularly, there seem to be more Black and Hispanic people in the eastern half of the Consortium than Asian or Pacific Islander.

National Origin

In considering patterns of segregation and integration on the basis of national origin and limited English proficiency (LEP) status, it is important to keep in mind that, although certain national origins are likely to be correlated with LEP individuals who speak the primary languages of those countries, there are nuances to the analysis. For instance, recent immigrants, who are more likely to have LEP status, may be concentrated in different neighborhoods than second or third generation Americans. This can have important implications for the implementation of local housing and community development policies. It may not make sense to prioritize resources for translated materials in a neighborhood that is, for example, 20% Filipino but within which just 1% of residents are LEP Tagalog speakers. At the same time, if a neighborhood is 10% Filipino but 5% of residents are LEP Tagalog speakers, such an investment may be more effective. Apparent discrepancies between which neighborhoods have national origin concentrations and which have LEP concentrations are reflective of the underlying HUD-provided data, and those differences may be useful for planning purposes.

In recent years, the Taunton Consortium has been increasingly attractive to recent immigrants, with a significant Portuguese-speaking population developing through immigration from Portugal, the Azores, and Brazil. According to the 2012-2016 American Community Survey, 7.5% of the Consortium's population is foreign born while approximately 14.1% of the region's population is foreign born. The most common countries of origin of the Consortium residents are Portugal, the Azores, India, Canada, and Brazil. It should be noted that the dominant ethnic group of three of those countries is White, and in Brazil nearly half of the population is white. In an area that is already mostly White, but with the share of White residents steadily declining over time, it is worth exploring how racial and ethnic diversity trends in the Taunton Consortium may follow different patterns than the common immigrant narrative. However, this influx of white immigrants is not as prevalent in the region, where the most common countries of origin of residents are Portugal, China excluding Hong Kong and Taiwan, Haiti, Cape Verde, and the Azores.

Individuals of Portuguese origin are the largest foreign-born group in the Taunton Consortium. They are mostly concentrated in the Taunton metro area, and extend west toward Providence, RI.

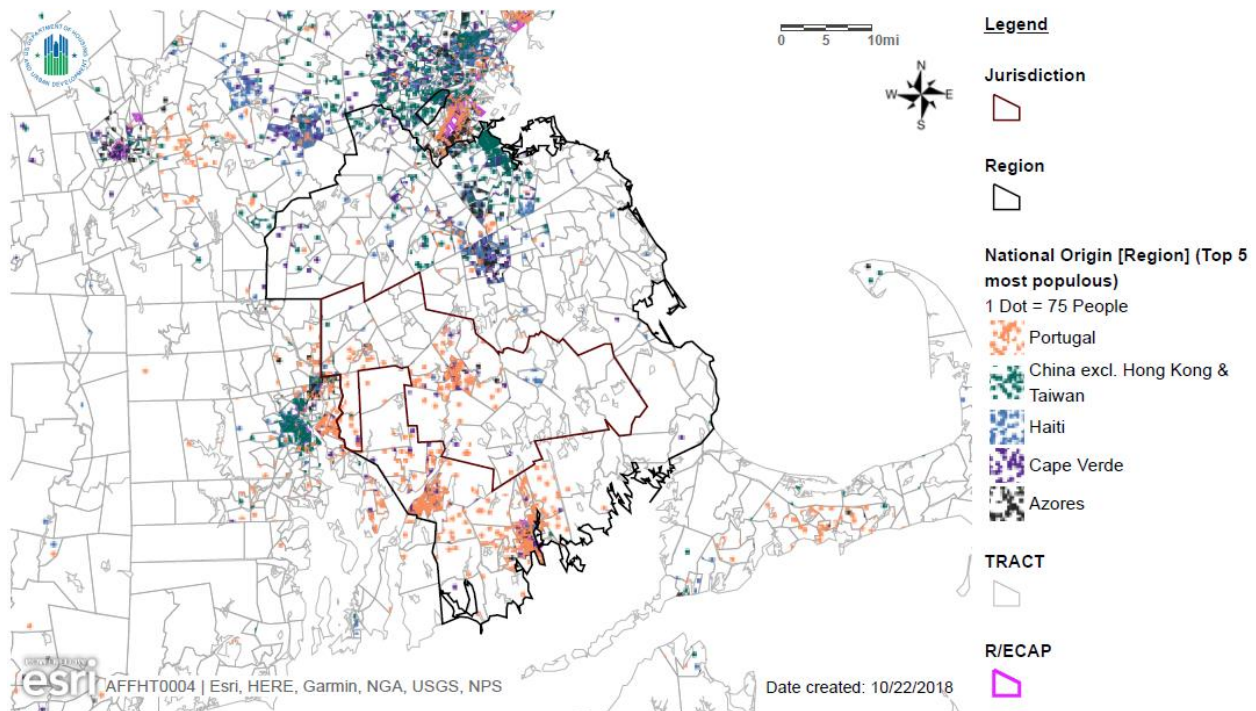
Like individuals from Portugal, individuals from the Azores are mostly concentrated in the Taunton metro area. The Azores are a Portuguese territory, and such grouping is likely due to a shared language and culture.

Individuals of Indian origin are predominantly concentrated in the northwest corner of the Consortium, close to the population centers of Providence, RI and Brockton, MA (as well as Mansfield), where they likely commute to work.

Canadian-born individuals are found throughout the Consortium, with larger numbers on the western side of the Consortium near Providence, RI. They are perhaps the mostly widely-distributed of the top five national origin groups.

Immigrants from Brazil are mostly concentrated in Taunton, which has a significant Portuguese-speaking population, and to the east in Middleboro, where it is the dominant immigrant group.

Map 4: National Origin, Taunton Consortium



Name: Map 3 - National Origin

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

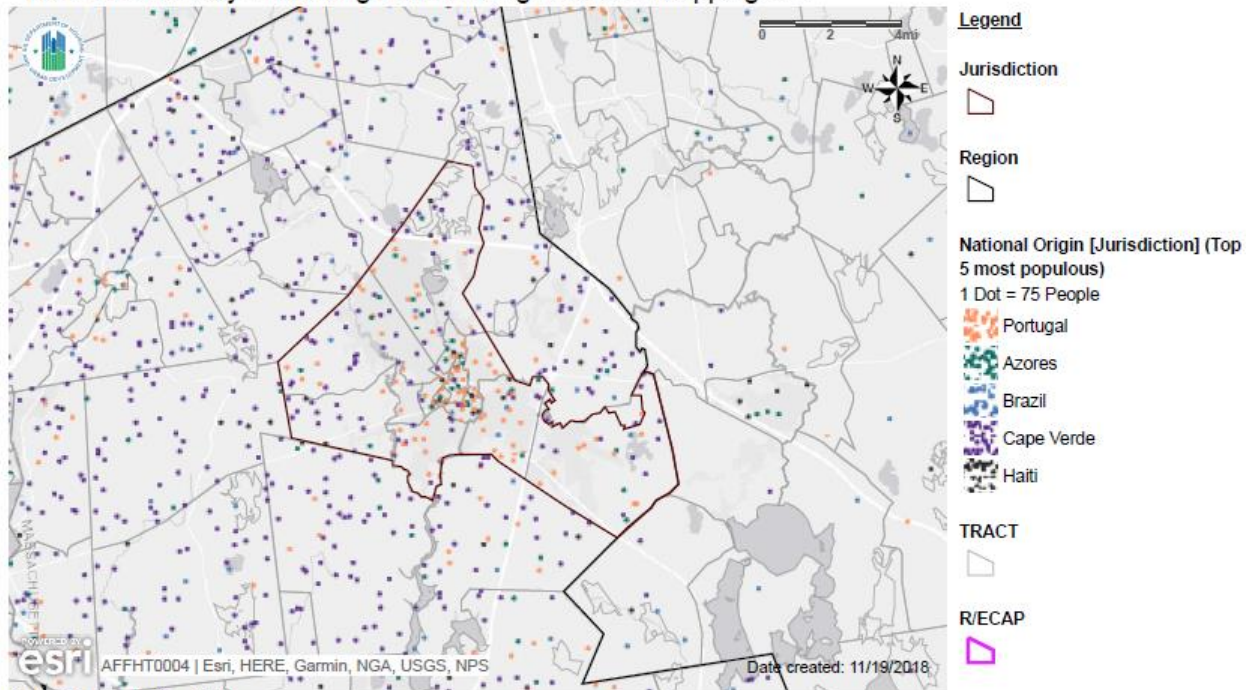
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 5: National Origin, Taunton, MA

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

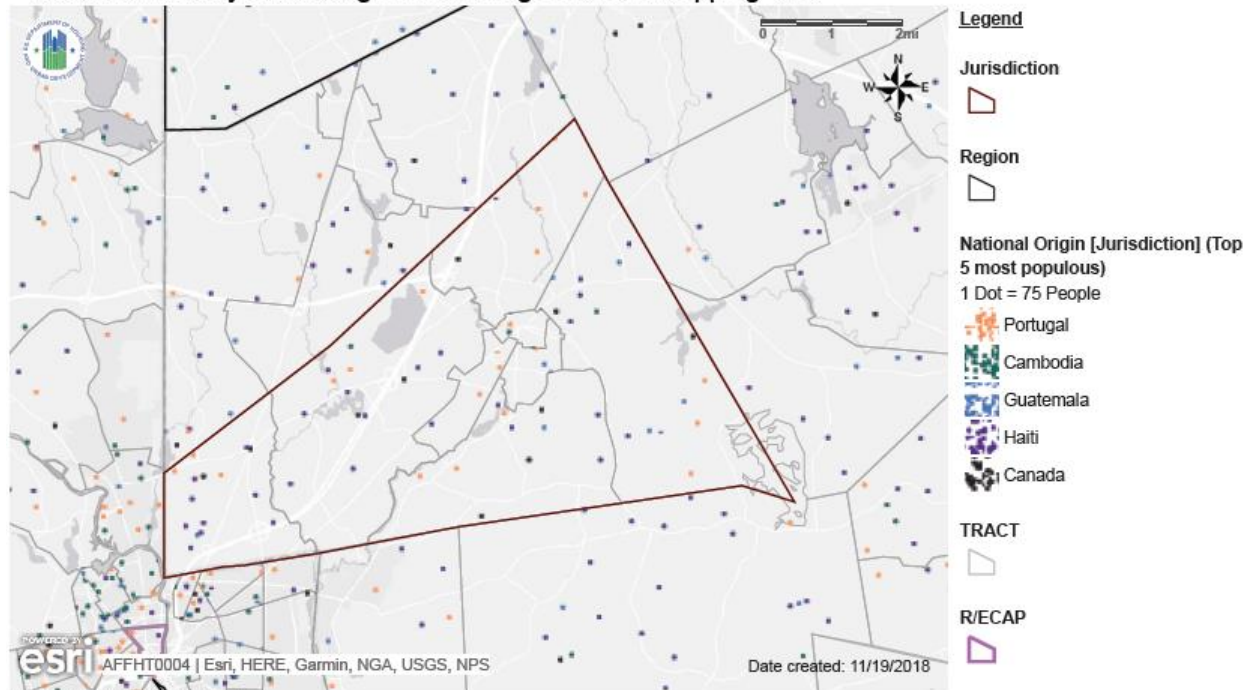
Jurisdiction: Taunton (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Map 6: National Origin, Attleboro, MA

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: Attleboro (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Regionally, the Portuguese immigrants residing within the Taunton Consortium make up a large share of the overall Portuguese population. Other areas of concentration include Fall River and New Bedford, as well as some in Brockton and its northern suburbs.

Immigrants from China are heavily concentrated in the suburbs of Boston, where there is very little presence of immigrants from the other top four national origin countries.

Immigrants from Haiti are found mainly in Brockton and to the north of Brockton, extending toward the greater Boston area. Brockton has a large Black population, and together with Cape Verde, Haitians make up a significant share.

Immigrants from Cape Verde do not register in the top five countries in the Consortium's analysis, but do appear in the region. Portuguese is Cape Verde's official language, although nearly all Cape Verdeans speak a creole language as their mother tongue. Nevertheless, this clustering of immigrants from Brazil, Portugal, the Azores, and Cape Verde around a common language is predictable. Immigrants from Cape Verde overwhelmingly reside in Brockton, but there are also found in the heavily Portuguese areas of Taunton, New Bedford, and Fall River. Notably, the dominant immigrant groups in Brockton are from Cape Verde and Haiti, with very few people from Portugal. Brockton is also a heavily Black and multi-racial city, comparatively, and contains two R/ECAPs.

In Attleboro, the top countries of national origin are Portugal, Cambodia, Guatemala, Haiti, and Canada. The starkest segregation patterns concentrate most foreign-born individuals in the city center, but relegate Haitian immigrants to the far western corner of Attleboro nearest Providence, as well as in the northernmost corner of the jurisdiction. In Taunton, the top five national origin countries are Portugal, the Azores, Brazil, Cape Verde, and Haiti, showing a clear preference for Portuguese as a native language. The clear majority national origin in nearly every census tract is Portuguese, and all groups appear well-distributed across the jurisdiction.

Limited English Proficiency (LEP)

In the Taunton Consortium, the top foreign languages spoken by those with Limited English Proficiency are Portuguese, Spanish, Chinese, Cambodian, and French Creole. In the region, the most commonly spoken foreign languages by LEP individuals are Portuguese, Spanish, Chinese, French Creole, and Vietnamese.

Portuguese speakers make up the largest LEP population in the Consortium. Portuguese speakers are mostly concentrated in the Taunton metro area, closely mirroring the concentrations of Portuguese (and/or the Azores) and Brazilian immigrants in the Consortium. There is a strong presence in Middleboro as well, which hosts a large population of Brazilian immigrants, while Portuguese immigrants are more common in the Taunton area.

Spanish speakers are mostly concentrated in the Taunton and Attleboro metro areas, with some presence in the eastern part of the Consortium. The eastern part of the Consortium is much more rural and less populous, and so the strong presence of Spanish speakers with limited English proficiency is notable.

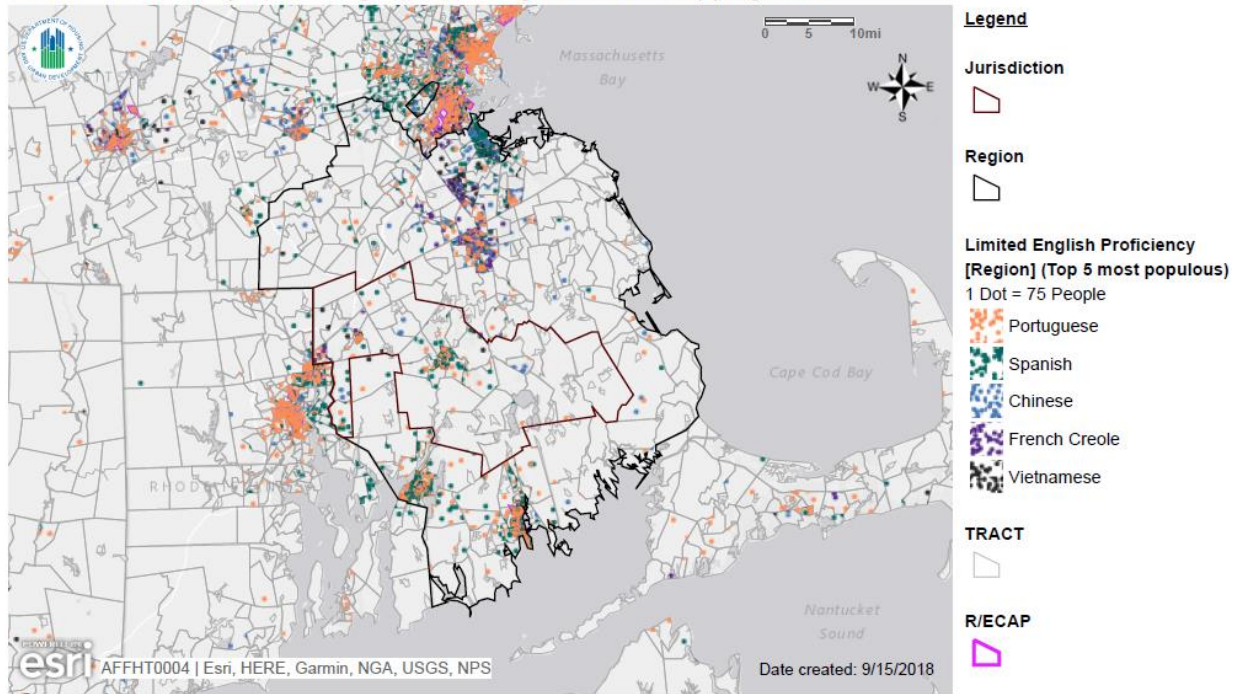
Chinese speakers are mostly found in the western part of the Consortium, near to Providence, RI.

Cambodian speakers are mostly found near the Attleboro metro area and near to the Taunton metro area, in the western part of the Consortium.

French Creole speakers are found in Taunton and on the western edge of the Consortium, near to Providence, RI.

Map 7: Limited English Proficiency, Taunton Consortium

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

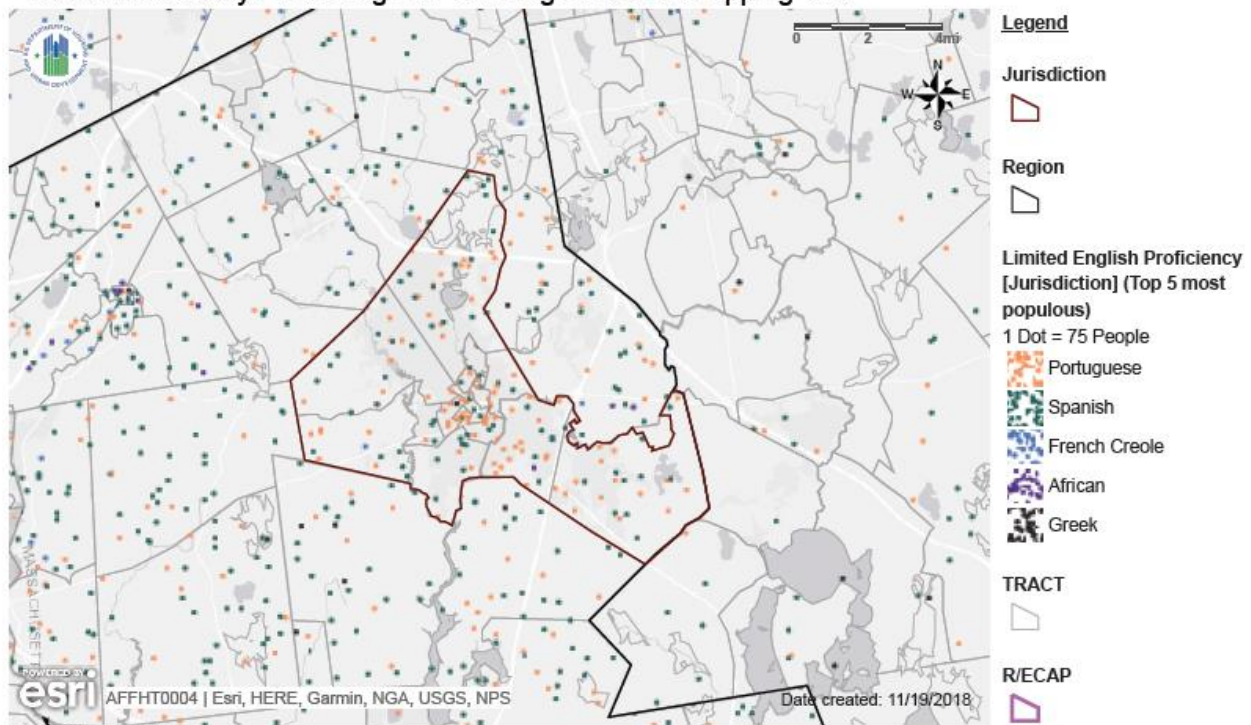
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 8: Limited English Proficiency, Taunton, MA

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

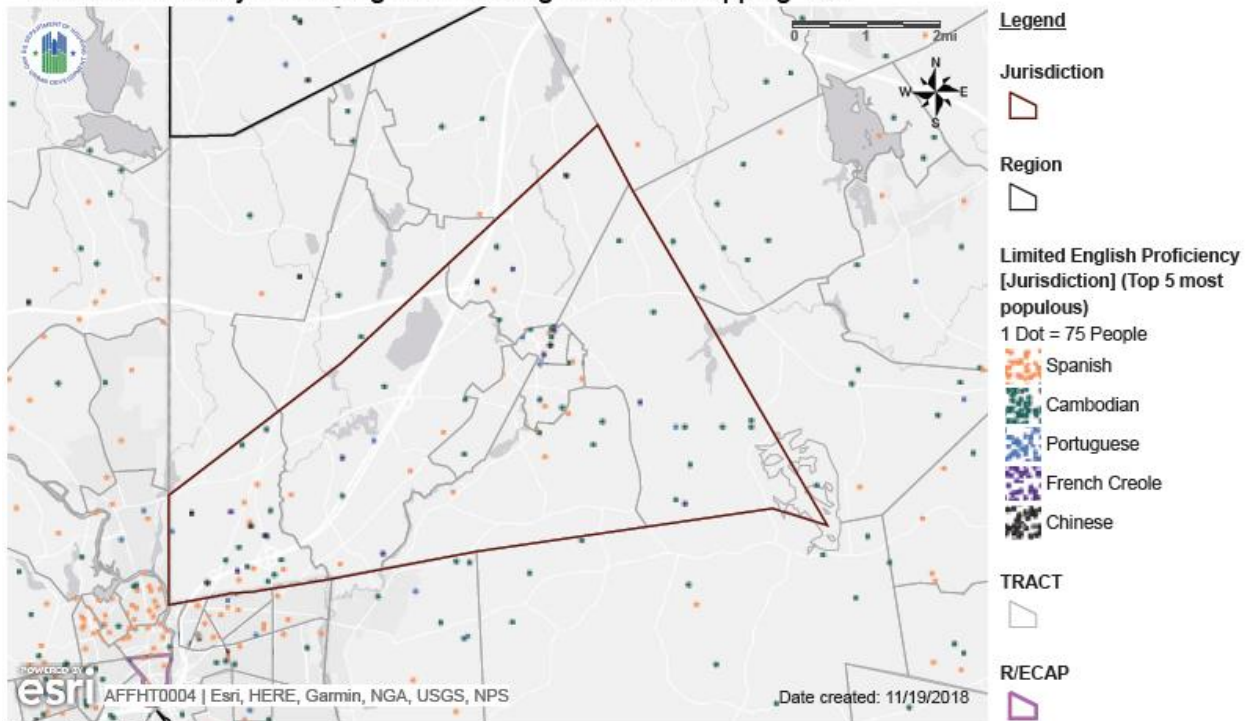
Jurisdiction: Taunton (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Map 9: Limited English Proficiency, Attleboro, MA

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: Attleboro (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Regionally, the Portuguese speakers in the Consortium still make up a significant part of the regional population. In addition to the Portuguese speakers near the Taunton metro area and in the western part of the Consortium near Providence, RI, there is a significant population in Brockton and trailing up into the Boston suburbs.

Spanish speakers in the Consortium make up a significant portion of the regional share of Spanish speakers. In addition to the Spanish speakers concentrated around Taunton, Attleboro, and near to Providence, RI, they are scattered through Brockton and up toward the Boston suburbs, where there is a significant concentration.

Chinese speakers are not very concentrated in the Consortium, but do make up a significant portion of the population in the region. They are mostly concentrated in the suburbs of Boston. There are some Chinese speakers in the Consortium, located in Attleboro and near the western border of the Consortium, near Providence, RI.

The French Creole speakers in the Consortium are located in the western half of the Consortium, near Attleboro and Providence, RI. Other French Creole speakers are located farther north, with a significant proportion in Brockton, and trailing north into the Boston suburbs. There is a significant Haitian immigrant population in Brockton.

The Vietnamese speakers in the region are concentrated in the Boston suburbs and in the Attleboro area, on the west side of the Consortium close to Providence, RI. There are not enough Vietnamese speakers in the Consortium, comparatively, to rank in the top five of LEP languages, but its prominence in the region rises when the Vietnamese speakers in the Boston suburbs are counted.

In Taunton, the top five languages are Portuguese, Spanish, French Creole, African (as a catchall), and Greek. In terms of national origin distribution, Portuguese individuals made up the clear majority in nearly every census tract. Because so many of the top immigrant countries in Taunton speak Portuguese, unsurprisingly, it makes up the majority language, distributed across the entire jurisdiction. There is an extremely clear pattern of language segregation employing HUD's catchall term "African," with speakers all concentrated in the census tract (614101) abutting the city center, divided from East Taunton by Amvets Memorial Highway. French Creole speakers are concentrated in the city center of Taunton, but spread over multiple census tracts.

In Attleboro, LEP individuals are concentrated in either the city center or the westernmost census tract closest to Providence. This overlaps consistently with national origin concentrations. French Creole speakers are the most notably segregated into the westernmost corner and the northernmost corner, closely tracking the locations of Haitian immigrants.

Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

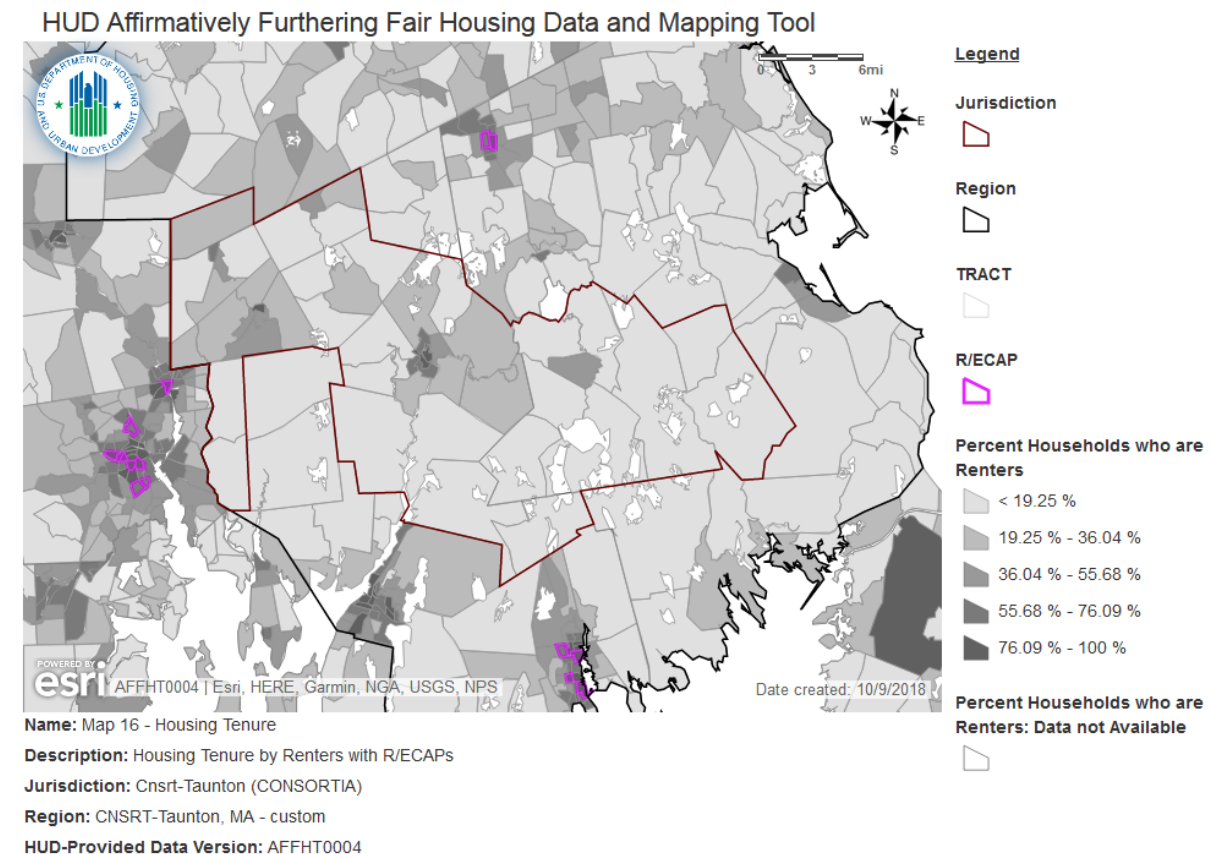
Up until 2010, the overall trend has been a decrease in segregation in the Taunton Consortium, as the population continues to diversify. However, several of the Dissimilarity Index values which were declining have inexplicably jumped up in value at the most recent measurement. As the Non-White/White Dissimilarity Index dropped from 27.66 to 26.24 to 25.32 from 1990-2010, its current value is 30.23. Similarly, the Hispanic/White segregation values fell from 41.32 to 38.52 to 33.36, before jumping to 36.42 in the current day. Black/White and Asian or Pacific Islander/White values were not as consistent, but the net result from 1990 to 2010 was still a decrease in segregation, until the present day, when the values rose again to 32.79 and 36.88, respectively. Although Hispanics historically exhibited the highest levels of segregation, the most recent numbers rank Hispanics and Asian or Pacific Islanders segregation levels as roughly equal. Visually, when comparing race and ethnicity trends over time, it is clear that the numbers and shares of minorities has increased, and that while these groups were at first concentrated in the cities of the Consortium, they have most recently spread into suburban areas, and likely become homeowners due to the housing stock available in those areas.

In the region, segregation levels have actually increased across the board. In the period from 2000 to 2010, the dissimilarity index values for Nonwhite, Black, Hispanic, and Asian segregation all dropped slightly, but the current numbers have all risen to higher values than they were in 2000. The region's segregation levels are all higher than in the consortium, and all register in the moderate to (slightly) high segregation brackets. Unlike in the Consortium, Hispanic segregation in the region is actually the lowest of the ethnic groups. Black segregation is the highest.

In Taunton and Attleboro, segregation levels between 1990 and the present day have all stayed low and fairly consistent. However, the segregation levels between 2010 and the present day all went up, mirroring the strange trend exhibited by the larger Consortium. The most notable change saw a near doubling of the segregation levels of Black vs. White from 2010 to present day in Attleboro, especially given that prior to that levels were consistently falling.

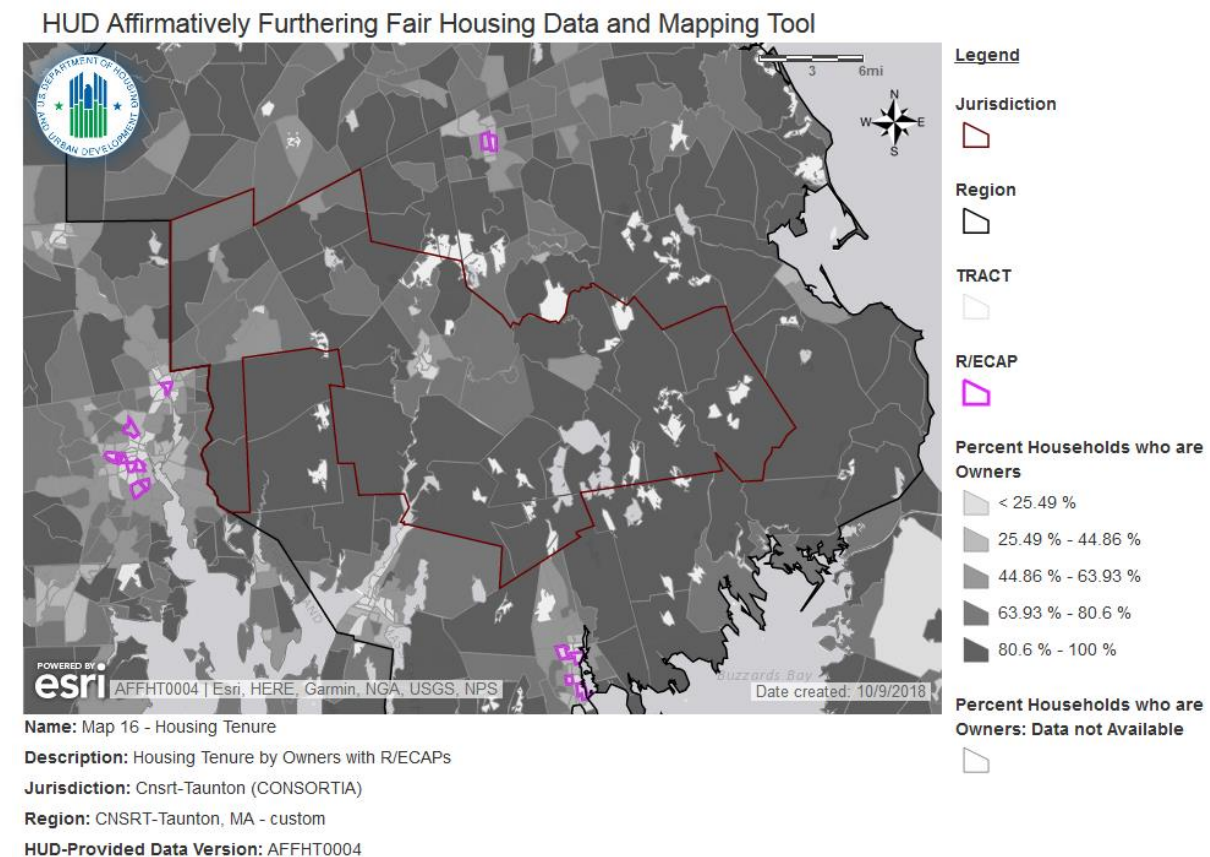
Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

Map 10: Housing Tenure by Renters with R/ECAPs, Taunton Consortium



Only one quarter of the households in the Consortium are renters. Unsurprisingly, the areas with the most renters are the metropolitan areas like Attleboro, North Attleboro, and Taunton. The areas surrounding these cities also see higher renting numbers, with Middleboro being particularly notable. Renters are also more concentrated in the western part of the Consortium, as the eastern part is very rural. Regionally, renting is more common in the population centers of Providence, RI, Brockton, New Bedford, and Fall River. The concentrations of renters in these population centers is probably even stronger than in the cities of the Consortium.

Map 11: Housing Tenure by Owners with R/ECAPs, Taunton Consortium



Three quarters of households in the Consortium own their homes. This is especially true in the eastern part of the Consortium, which is very rural. Homeowners remain dominant throughout the Consortium, with renters surpassing owners only in the population centers near Taunton and Attleboro. Homeownership is strong throughout the region as well. Nearby Providence, RI stands out as a haven for renters, but the rest of the area maintains strong ownership numbers.

These patterns hold true for Taunton and Attleboro, individually, as well. The city centers of Taunton and Attleboro host 75% renters over owners, markedly falling to around 20% renters in the outer edges of each CDBG jurisdictions. The larger Providence-Warwick RI-MA Region shows strong renting numbers in Providence, New Bedford, Fall River, and Newport, but with an overall trend of homeownership.

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

Although the City of Taunton and the central portion of the City of Attleboro have become much more racially and ethnically diverse since 1990, this trend has not led to increased integration in the Consortium more broadly. As gentrification and displacement pressures result in the

displacement of low-income Black and Hispanic residents from formerly low-income neighborhoods in Boston and Providence, there is a risk of the recreation of pockets of poverty in Attleboro and Taunton. An equitable, regional approach to this challenge would both work to prevent displacement from Boston and Providence while also ensuring that residents who choose to move have a broad range of options, including high-opportunity areas both within and outside the Consortium.

Additional Information

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

Religion

HUD does not provide and the Census Bureau does not collect data concerning religious affiliation, but religion remains a prohibited basis for discrimination under the Fair Housing Act. Although the data discussed above with respect to national origin and LEP status can provide some insight into residential patterns with respect to religious given correlations between language, national origin, and religion, the resulting picture is merely a rough proxy. It is also a proxy that does not genuinely capture minority religious communities whose members are less likely to be recent immigrants. Data from the Urban Institute's National Center for Charitable Statistics provides another complementary frame for analyzing residential patterns with respect to religious affiliation. Although congregations vary in size and not all congregants live in or even near the cities in which their congregations are located, the location of congregations of minority faiths still contributes to a broad impressionistic picture of where religious adherents live. The table below reflects the presence of minority faith congregations in the Taunton Consortium by city or town.

Table 5: Non-Christian Houses of Worship by City/Town

City/Town	Buddhist	Muslim	Jewish
Raynham	1		
Taunton			1
Attleboro			1
Mansfield			1
Seekonk		1	

The vast majority of religious congregations in the Taunton Consortium are Christian, and several churches are specifically Portuguese. Regionally, however, there is far more diversity of religious organizations, specifically in Providence, RI. There are also several Hindu temples to the north of the Consortium, aligning roughly with the residential patterns of Indian-born residents.

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

The Consortium and the Cities of Taunton and Attleboro have not implemented mobility strategies with the purpose of fostering residential racial and ethnic integration. Taunton has made place-based investments in its core that should help guard against the risk of re-segregation.

Contributing Factors of Segregation

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

- Community opposition

Community opposition is a significant contributing factor for segregation in the Greater Taunton area. Examples of Not in My Backyard (“NIMBY”) in the Greater Taunton area include opposition to proposed affordable housing developments.

To try to address statewide NIMBY issues, Massachusetts passed Chapter 40B (“40B”) in 1969 in an attempt to counter community opposition to affordable housing.¹ The purpose of 40B is to promote the construction of affordable housing “by reducing unnecessary barriers created by local approval processes, local zoning and other restrictions.”² 40B allows local Zoning Boards of Appeals to approve affordable housing developments “under flexible rules if at least 20-25% of the units have long-term affordability restrictions.”³ The law also requires communities to have a minimum of 10% of their housing as affordable housing.⁴ Much of the community opposition to affordable housing in the Greater Taunton area, and Massachusetts in general, is exemplified by attitudes towards the use of 40B. In the larger state, there has been community opposition to developers’ use of 40B. Some “homeowners and local officials have blamed Chapter 40B for shoehorning high-density projects into established neighborhoods and giving developers too much leverage.”⁵

Opposition to affordable housing developments is reflected by repeated attempts to abolish or amend 40B.⁶ In 2010, there was a ballot question about whether or not to repeal 40B.⁷ The ballot question, which proposed repealing the law, was defeated by a majority of voters.⁸ Boston

¹ <http://www.acton-ma.gov/DocumentCenter/View/335/40B-Fact-Sheet>

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ <http://www.patriotledger.com/x370073803/Chapter-40B-repeal-is-rejected-as-Question-2-fails>

⁶ In 2007 alone, there were 49 bills that tried to amend to abolish 40B.

http://archive.boston.com/news/local/articles/2007/10/25/opposition_to_40b_intensifies/

⁷ <http://www.patriotledger.com/x370073803/Chapter-40B-repeal-is-rejected-as-Question-2-fails>

⁸ *Id.*

and the close suburbs voted strongly in support of the law.⁹ The supporters of 40B, which included the Massachusetts Association of Realtors and affordable housing advocates, were disproportionately well funded compared to the other side.¹⁰ This could indicate while there is opposition to affordable housing in Massachusetts, there is still some support since the majority of voters saved 40B in a ballot measure.¹¹

Community opposition to affordable housing units can also be found in the Greater Taunton Area. In 2017, Neighborhood of Affordable Housing (NOAH) proposed an affordable-rate residential housing building in Taunton.¹² The proposal was for a 24 affordable-rate and 14 market-rate units in downtown Taunton.¹³ The proposal encountered pushback from the Taunton Zoning Board of Appeals (ZBA) for the proposal including complaints about possible parking issues.¹⁴ The Taunton ZBA expressed opposition to the number of units that NOAH was proposing to put into the building voted to change aspects of the development.¹⁵

NOAH continued to run into opposition from ZBA throughout the process.¹⁶ NOAH's executive director, Phil Griffie, stated that he felt that he was being met with opposition to the development by the ZBA even though his goal is to revitalize downtown Taunton.¹⁷ Since the Zoning Board of Appeals reduced the number of apartments and set requirements for parking spots, the future of the project is potentially in danger.¹⁸ In addition, the repeated ZBA hearings have been challenging to NOAH's funding and NOAH's ability to complete the project.¹⁹

- Displacement of residents due to economic pressures

Consortium Cities

Displacement of residents due to economic pressures does not appear to be a significant contributing factor affecting Segregation in Attleboro, Taunton, or any of the other cities within the Consortium.

Regional Analysis

Though not directly affecting Consortium cities at the present moment, it is noteworthy for a larger regional analysis that nearby Providence, RI is experiencing rising housing prices that may lead to gentrification and displacement. A recent report found that neighborhoods labeled potentially gentrifying “experienced a 47.8 percent average increase in median gross rent, nearly

⁹ *Id.*

¹⁰ Opponents of the ballot measure “raised more than \$900,000 while backers only received \$10,000 in contributions.” <http://www.patriotledger.com/x370073803/Chapter-40B-repeal-is-rejected-as-Question-2-fails>

¹¹ <http://www.patriotledger.com/x370073803/Chapter-40B-repeal-is-rejected-as-Question-2-fails>

¹² <http://www.tauntongazette.com/news/20171124/union-block-residential-development-gaining-ground>

¹³ <http://www.tauntongazette.com/news/20180113/union-block-development-in-limbo-following-taunton-zba-meeting>

¹⁴ <http://www.tauntongazette.com/news/20180113/union-block-development-in-limbo-following-taunton-zba-meeting>

¹⁵ <http://www.tauntongazette.com/news/20180121/union-block-development-at-critical-juncture>

¹⁶ <http://www.tauntongazette.com/news/20180121/union-block-development-at-critical-juncture>

¹⁷ <http://www.tauntongazette.com/news/20180121/union-block-development-at-critical-juncture>

¹⁸ <http://www.tauntongazette.com/news/20180121/union-block-development-at-critical-juncture>

¹⁹ <http://www.tauntongazette.com/news/20180121/union-block-development-at-critical-juncture>

double the growth citywide.”²⁰ The study’s author further noted that due to low levels of new housing production in Providence, a strategy of “development without displacement” is recommended.²¹ Gentrification is not yet at crisis levels and experts believe there is still time to curb the tide,²² but due to its relative proximity to the Consortium cities it is worth keeping tabs on how Providence is dealing with gentrification and displacement in the near future.

- Lack of community revitalization strategies

Lack of Community Revitalization Strategies is a contributing factor to Segregation. Many cities in the HOME Consortium are currently working on plans to encourage development in response to increased population and infrastructure needs. Generally, several cities in the Consortium, Attleboro, North Attleboro and Taunton, have also been designated as “Difficult to Develop Areas” in the 2018-2019 Massachusetts Department of Housing and Community Development Qualified Allocation Plan 2018-2019 for the purpose of being eligible for LIHTC boosts.²³ In addition, all of the HOME Consortium cities are members of the Community Compact Cabinet (CCC), instituted by the governor in 2015.²⁴ The CCC was created to promote best practices among state and local governments. Cities who sign on are required to select which “best practices” they will adopt in exchange for eligibility for certain grant funds.²⁵ Redevelopment efforts for specific cities summarized below.

Attleboro

The Attleboro Office of Community Development received an almost \$2 million Neighborhood Stabilization grant in 2011 that was used for grants and loans to developers for acquisition and rehabilitation of approximately 12 affordable housing units. Since then, CDBG annual funding levels have been limited to approximately \$434,000. However, through various funding sources the downtown has been transformed in several key ways. Old industrial buildings have been demolished, and in their place now stand new buildings—both residential and commercial, a park, and soon additional roadways to increase access to train services will be added.²⁶ The MA

²⁰ Christine Dunn, *Providence ‘potentially gentrifying’ as rents rise, report says*, Providence Journal (May 25, 2018, 12:01 AM), <http://www.providencejournal.com/news/20180525/providence-potentially-gentrifying-as-rents-rise-report-says>.

²¹ Id.

²² Christine Dunn, *Gentrification Locking Some out of Housing Market*, Providence Journal (May 25, 2018, 12:33 PM), <http://www.providencejournal.com/news/20180525/gentrification-locking-some-out-of-housing-market>, (Quoting Brenda Clement, “Clement said in Providence, unlike cities where housing costs have spiraled out of sight, ‘we’re early enough in the process to control it,’ by being proactive.”)

²³ MA Department of Housing and Community Development Qualified Allocation Plan (2018-2019), <https://www.mass.gov/files/documents/2018/08/31/20182019QAP.pdf>.

²⁴ Jordan Deschenes, *Dighton Inks Compact with State Aimed at Preserving Town’s Rural Character*, Taunton Gazette (Oct. 3, 2017, 5:32 PM), <http://www.tauntongazette.com/news/20171003/dighton-inks-compact-with-state-aimed-at-preserving-towns-rural-character>.

²⁵ Id.

²⁶ George H. Rhodes, *Attleboro’s Plan to Remake Downtown is Finally Bearing Fruit*, The Sun Chronicle (Feb. 12, 2017), http://www.thesunchronicle.com/news/local_news/attleboro-s-plan-to-remake-downtown-is-finally-bearing-fruit/article_b96f4085-e3e3-512e-81a4-164e23d41cbc.html.

Brownfield Redevelopment fund further supported the downtown revitalization project by funding reclamation and repurposing of old manufacturing and industrial structures.²⁷

Middleborough

Middleborough used its most recent Community Development Block Grant funds for “housing rehabilitation and infrastructure improvements.”²⁸ These funds were granted in 2013. The city’s current Community Development Strategy contains comprehensive goals to both create and revamp existing affordable housing within the town while completing structural and cosmetic improvements to the downtown area to promote economic investment.²⁹ The downtown plan also provides explicitly for job training and local college programs to provide jobs and economic opportunity.³⁰ Middleborough’s CCC best practice is “Preparing for Success.”³¹ Middleborough’s downtown project was also a 2016 Technical Assistance Grantee through the Massachusetts Downtown Initiative.³²

Taunton

The City of Taunton’s Comprehensive Master Plan acknowledges that promoting housing accessibility has not been a priority, but that the city now realizes the important link between housing policy and the other economic revitalization it desires and needs.³³ However, the city is currently trying to implement several revitalization plans, with a focus on downtown Taunton and brownfield redevelopment. Part of the current downtown revitalization plan required seizing and demolishing three apartment buildings in order to create parking and other necessities for the rebuild of Taunton City Hall that was destroyed in a fire years ago, and to sell for commercial use.³⁴ The city also received a \$500,000 grant to clean up brownfield sites and convert them to lands suitable for commercial development or public uses.³⁵

Greater Region

Providence: Providence was a 2008 Grantee of the Neighborhood Stabilization Program, whose \$26 million in funds has been used to stabilize the neighborhoods with “the highest percentage of foreclosures; the highest percentage of subprime loans; and the greatest likelihood of future high foreclosure rates.”³⁶ The program has seen significant success in protecting housing supply and revitalizing neighborhoods. The city itself has also passed the Providence Neighborhood

²⁷ https://www.massdevelopment.com/assets/pdfs/news-pdfs/brownfields_annualreport_11.pdf

²⁸ <http://www.middleborough.com/housing-community-development/block-grants-cdbg.html>

²⁹ <http://www.middleborough.com/housing-community-development/documents/CommunityDevelopmentStrategy2018.pdf>

³⁰ Id.

³¹ Middleborough Community Compact (2015), <https://www.mass.gov/doc/middleborough-community-compact/download>.

³² <https://www.mass.gov/service-details/massachusetts-downtown-initiative-mdi>

³³ Taunton Tomorrow Comprehensive Master Plan (76), https://www.taunton-ma.gov/sites/tauntonma/files/pages/taunton_comprehensive_master_plan_compressed_11.9.18.pdf.

³⁴ Charles Winokoor, *City Seizes, Sells Downtown Taunton Sites as Part of Central Business Revitalization*, Taunton Gazette (Sept. 21, 2018, 7:35 PM), <http://www.tauntongazette.com/news/20180304/city-seizes-sells-downtown-taunton-sites-as-part-of-central-business-revitalization>.

³⁵ https://www.taunton-ma.gov/sites/tauntonma/files/news/news_release_from_region_01_epa.docx.

³⁶ <http://ohcd.ri.gov/community-development/nsp/>

Revitalization Act, a program providing tax incentives for development projects between \$250,000 and \$3 million.³⁷ The projects can include “commercial, multi-family, and mixed-use projects as well as both new construction and the rehabilitation of existing properties.”³⁸ The Act requires good faith efforts to support women and minority owned businesses, and targets 19 of Providence’s neighborhoods that have been designated “Opportunity Areas.”³⁹

Pawtucket, RI

Pawtucket has seen several large-scale redevelopment efforts lately, some public and some private. In 2017, financial closing took place for the renovation of 292 public housing units and the creation of 20 new units through a partnership with Winn Companies, Omni Development Corporation, and the Pawtucket Housing Authority.⁴⁰ The city also has the Pawtucket Façade improvement Program, which provides loan and grant funds for aesthetic improvements to drive revitalization,⁴¹ and it has recently received funds for a new commuter rail station.⁴²

New Bedford

The City of New Bedford has been putting significant effort and funds into the commercial and recreational revitalization of its waterfront as the core of its community development plans. In 2016, the Waterfront Historic Area League was provided \$1 million in financing from MassDevelopment to be used for the building of “a makerspace, collaborative learning center, arts gallery and market as well as co-work space, two new eateries, and four apartments.”⁴³ The 2018 Action plan included objectives to better public infrastructure, improve various routes to affordable housing, and “expand economic development opportunities through business assistance.”⁴⁴

Brockton

Brockton is also currently implementing a downtown revitalization plan that includes the demolition and reconstruction of abandoned or blighted properties for the creation of commercial and residential use. There are currently 10 projects of the plan that are in progress.⁴⁵ The 2017 Brockton Redevelopment Authority Annual Plan prioritized “the improvement of commercial building facades, enhancement of public safety, housing rehabilitation assistance to low- and

³⁷ <http://www.providenceri.gov/mayor-elorza-council-president-aponte-announce-providence-neighborhood-revitalization-act/>

³⁸ Id.

³⁹ Id.

⁴⁰ https://www.winncompanies.com/press-releases/action/view-press-release/press_release%5Bid%5D/528/. See also, <https://www.wpri.com/news/local-news/blackstone-valley/historic-housing-project-in-pawtucket-getting-major-facelift/1180813065>.

⁴¹ <http://www.pawtucketri.com/planning-redevelopment>

⁴² Id.

⁴³ <https://www.waterfrontleague.org/news/massdevelopment-ccc-investment/>

⁴⁴ <http://newbedford.wpengine.netdna-cdn.com/community-development/wp-content/uploads/sites/34/ACTION-PLAN-EXEC-SUMMARY-INFO-SHEET.pdf>

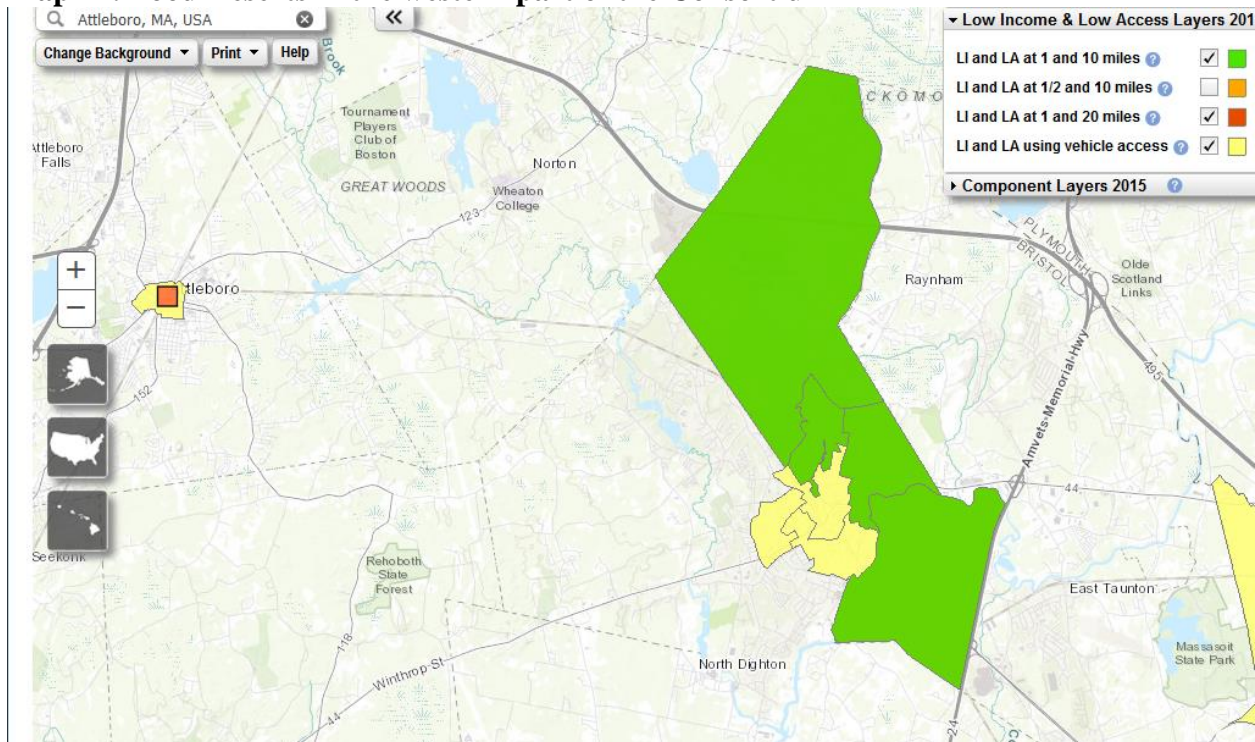
⁴⁵ <https://www.enterpriseneews.com/news/20171215/two-years-in-brockton-officials-reflect-on-downtown-revitalization-plan>

moderate-income households and mechanisms to prevent further destabilization of marginal neighborhoods.”⁴⁶

- Lack of private investments in specific neighborhoods

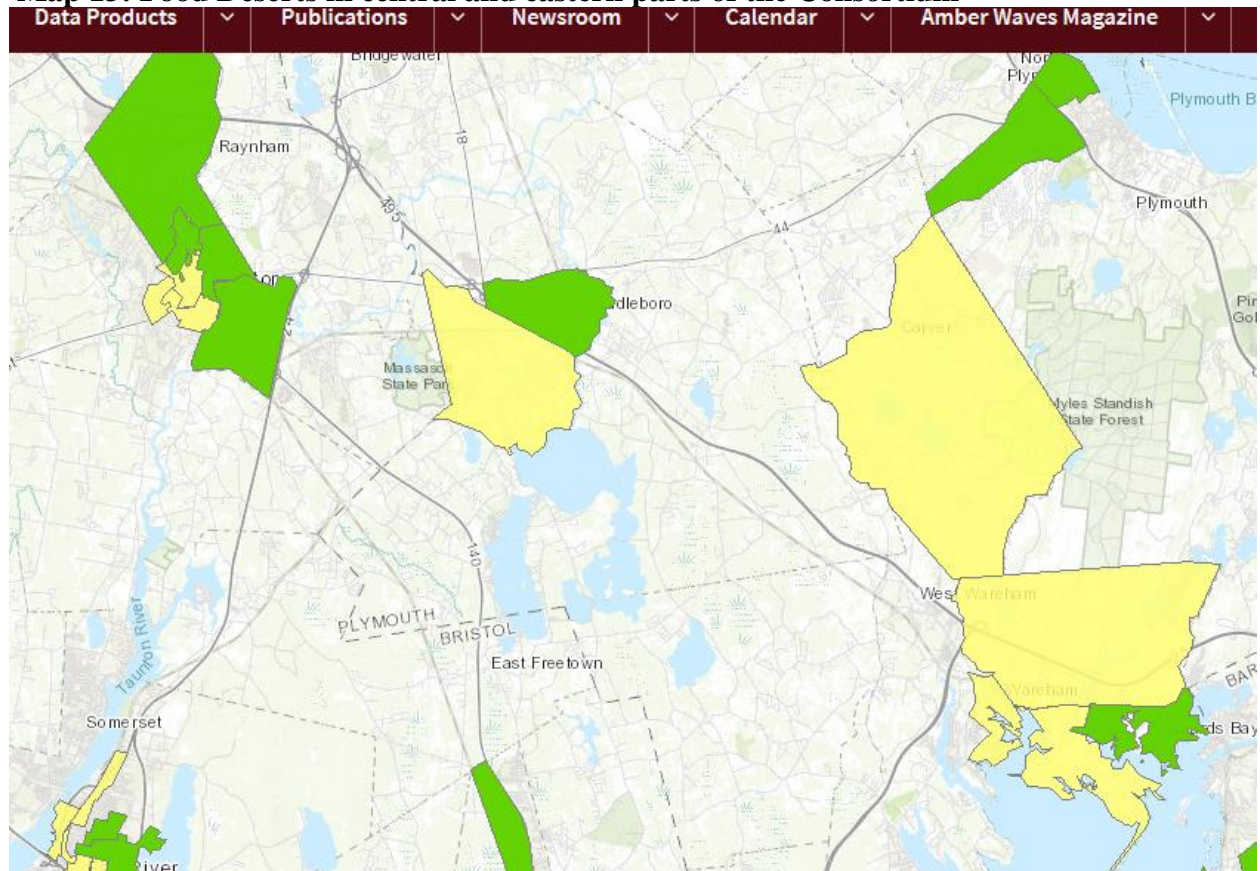
Lack of private investment in specific neighborhoods is a contributing factor to Segregation. One indicator of a lack of private investment in low-income neighborhoods is the distribution of grocery stores across a residential area. Traveling more than one mile in urban areas and ten miles in rural areas to a grocery store classifies an area as a food desert. In the maps below, the green coloring indicates food deserts based on that criteria, and the yellow coloring indicates areas where more than 100 housing units do not have a vehicle and are more than ½ mile from the nearest supermarket in urban areas (20 miles in rural areas).

Map 12: Food Deserts in the western part of the Consortium



⁴⁶ <http://www.brockton.ma.us/docs/default-source/documents/bra-2017-annual-plan.pdf>

Map 13: Food Deserts in central and eastern parts of the Consortium



While the food deserts (marked in green) are more suburban areas outside of the cities, the areas marked in yellow align with the metropolitan areas of Taunton, Attleboro, and Middleboro. This indicates poorer residents who do not have cars to get to the grocery store. These areas have larger minority, immigrant, and LEP populations, as well as the majority of public housing.

Another indicator of poor private investment is the location of pharmacies. Overall, the Consortium seems well served by pharmacies. However, the towns of Plainville, Lakeville, Dighton, and Mansfield do have noticeably *less* pharmacies than their neighbors, though it is likely still enough. Pharmacies are often located within grocery stores, so we might expect to see some overlap between food deserts and pharmacy deserts. According to the maps above, that does not seem to be the case.

Another indicator of private investment is the distribution of banks. There are many different banks to choose from in the Consortium, including credit unions. In small towns, low income residents tend to be concentrated in multifamily apartments in the city/town center, which is also where bank branches tend to be located. Overall, it seems that there are plenty of banking options, and they are well distributed across population centers.

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

A lack of public investment in specific neighborhoods is a significant contributing factor to Segregation. Two strong indicators of poor public investment are the state of paved roads and the state of sidewalks, especially near public schools and other highly frequented public places. Under Massachusetts state law, vehicles that are damaged by potholes are eligible for financial compensation.⁴⁷ As such, municipalities have a vested interest in maintaining roads and fixing potholes. In Taunton, potholes should be reported to the Department of Public Works.⁴⁸ Nevertheless, there has been widespread reporting that the state of paved roads in Taunton is very poor.⁴⁹ Several cities and towns utilize seeclickfix.com as an additional portal through which residents can report road issues such as potholes. In nearby Brockton the theme of excessive potholes has continued; a particularly bad street even has its own Facebook page.⁵⁰

Much has been said in other contributing factors about the lack of accessible sidewalks at popular pedestrian crossings. Additionally, in the winter the problem of un-shoveled sidewalks becomes a major issue, especially near schools. As climate change continues to exacerbate storm conditions, communities can expect to get even more snow during major storms and must adapt their emergency response plans to account for this.⁵¹

- Lack of regional cooperation

Lack of local or regional cooperation is a significant contributing factor to segregation and disparities in access to opportunity in the Consortium as well as regionally. Although the infrastructure is in place for effective local and regional cooperation in the Consortium and members of the Consortium participate in good faith, those efforts are undermined by the non-participation in the Consortium of high-opportunity towns that would be logical inclusions in the Consortium. In particular, the good faith participation of the Town of Easton, formerly a Consortium member, and the Town of Rehoboth would strengthen the Consortium's ability to implement coordinated strategies for meeting regional affordable housing need in an equitable manner.

In addition to the problem of Consortium non-participation, a lack of meaningful representation of Consortium communities in regional entities, like the Massachusetts Bay Transportation Authority, undermines their ability to effectively connect members of protected classes to opportunity through projects like the extension of commuter rail service to Taunton. There is no

⁴⁷ M.G.L. c. 84.

⁴⁸ <https://www.taunton-ma.gov/risk-management/pages/pothole-season-claim-information-damage-due-road-defects>

⁴⁹ <http://www.tauntongazette.com/news/20180502/taunton-fields-claims-during-flat-out-bad-pothole-season>; <http://www.tauntongazette.com/news/20180413/holy-moly-taunton-mayor-wants-700k-to-fill-potholes-and-repave-roads>. Also in Seekonk <https://www.wpri.com/news/local-news/pothole-blamed-for-at-least-10-flat-tires-gets-repaired/1082535095>

⁵⁰ <https://www.facebook.com/AlgerStreet>

⁵¹ In Brockton, the city recently used plows to try to clear the sidewalks before school, with mixed results.

<http://middleborough.wickedlocal.com/news/20180108/brockton-works-to-plow-sidewalks-but-complaints-continue>.

In the past, the City of Taunton has had trouble enforcing its own ordinances requiring property owners to clear their sidewalks to facilitate better business accessibility after a storm.

<http://www.tauntongazette.com/x1651176706/Taunton-City-Council-to-property-owners-Shovel-sidewalks-or-be-cited>

need to create a new regional transportation agency from whole cloth, but the existing agency must do more to integrate the Consortium into its planning and service delivery efforts.

- Land use and zoning laws

Land Use and Zoning laws are a significant contributing factor to Segregation. As traditionally suburban and rural areas, many of the HOME Consortium cities have zoning or land use laws that primarily promote single family homes with either the direct or indirect effect of prohibiting multifamily/manufactured/affordable housing or relegating it to concentrated and less desirable areas of the city.

Attleboro

The Attleboro zoning bylaws do not contain an inclusionary zoning provision, but they do provide for a density bonus, in which the inclusion of a forever-restricted low income housing unit provides an entitlement to an additional market rate unit.⁵² There are five single residence zones that provide only for single-family housing.⁵³ Two-family dwellings are only allowed by special permit, and multi-family housing is not permitted at all. In the three General Zoning districts, single and two-family housing is permitted.⁵⁴ Multi-family dwellings are only permitted by right in one of these zones, and by special permit in the other two.⁵⁵ Further, the zones that allow for multi-family housing concentrated near the center of the city⁵⁶ and are sandwiched between single family residential areas and industrial areas—which may impact access to public and private amenities.⁵⁷

Berkley

In Berkley, the residential zone provides only for single family homes as a matter of right, on one and a half acre lots.⁵⁸ Multi-family dwellings are only allowed by special permit on a lot of at least 1.5 acres, and the building is not to exceed four dwelling units.⁵⁹ The city does not have an inclusionary zoning provision, nor does it provide a density bonus.

Carver

Carver has only one residential zone, which only allows single family homes.⁶⁰ Duplex and two-family homes are only permitted by special permit in the residential, general business, village business, and village zones.⁶¹ There are no provisions for multi-family homes that exceed two dwelling units. Carver does, however, have a very extensive exclusionary zoning provision and a density bonus. For rental inclusionary units, they must be rented at no more than 30% of the

⁵² Attleboro Zoning Ordinance, §17–10.6, <https://www.cityofattleboro.us/DocumentCenter/View/379/Zoning-Ordinance-PDF>

⁵³ Id., §17–2.1.1

⁵⁴ Id.

⁵⁵ Id.

⁵⁶ <https://www.cityofattleboro.us/DocumentCenter/View/387/Zoning-Map-2---Color-PDF>

⁵⁷ <https://www.cityofattleboro.us/DocumentCenter/View/388/Zoning-Map-3---Color-PDF>

⁵⁸ Berkley zoning bylaws, Section 4.

http://townofberkleyma.com/Pages/BerkleyMA_Planning/Zoning%20Dec%202014.pdf

⁵⁹ Id.

⁶⁰ Town of Carver Zoning Bylaws (2016),

https://www.carverma.gov/sites/carverma/files/uploads/2016_zoning_bylaw.pdf

⁶¹ Id.

household income.⁶² In selling inclusionary units, the price must be affordable for a household making 70% of the Area Median Income.⁶³ For each affordable unit provided, the developer is entitled to one additional market rate unit.⁶⁴ The provision further requires that all affordable units be comparable in location and design to market rate units.⁶⁵

Dighton

Dighton Bylaws allow for single-family homes in both the residential and business districts, only.⁶⁶ Two family dwellings are only permitted by special permit in these two districts, and multi-family dwellings are not permitted in any zoning districts.⁶⁷ The bylaws do not contain an inclusionary zoning provision or a density bonus.

Freetown

Freetown zoning bylaws allow single family and duplex homes as of right in the residential, general business, village residential and village business districts.⁶⁸ Multi-family units are not allowed in any district without a special permit.⁶⁹ The bylaws do not contain an inclusionary zoning provision or a density bonus.

Lakeville

Lakeville does provide only for single-family detached dwelling in residential zones, and by special permit in other zones.⁷⁰ Mobile homes are explicitly prohibited on a permanent basis, with the exception of temporary and nonrenewable permits.⁷¹ There is no provision for multifamily dwellings. According to the Lakeville bylaws, not less than 20% of housing units constructed must be affordable, and 25% of rental dwelling units in a rental project must be affordable.⁷²

Mansfield

Mansfield allows for single family homes in all residential districts and by special permit in two of the business districts.⁷³ By contrast, two family homes are only allowed in the high density residential district, and by special permit in only one of the business districts.⁷⁴ Multifamily homes are only permitted by special permit in the Reservoir residential district and two of the business districts, and are only permitted as of right in one of the industrial district. They are

⁶² Id., §3010 (c)(i).

⁶³ Id., §3010 (c)(ii).

⁶⁴ Id., §3030.

⁶⁵ Id.

⁶⁶ Dighton Zoning Bylaws, Appendix A: Use Regulation Schedule, <http://www.dighton-ma.gov/Zoning%20Bylaws.pdf>.

⁶⁷ Id.

⁶⁸ Freetown Zoning Bylaws. §11.18, https://www.freetownma.gov/sites/freetownma/files/u74/bylawsjun2018_20180719135042.pdf.

⁶⁹ Id., §11.6 (B)

⁷⁰ Lakeville Zoning Bylaws, §4.1.1, https://www.lakevillema.org/sites/lakevillema/files/uploads/2018zoningbylawatmrevised_0.pdf.

⁷¹ Id., §8.7.1, 8.7.2.

⁷² https://www.lakevillema.org/sites/lakevillema/files/uploads/2018zoningbylawatmrevised_0.pdf

⁷³ Mansfield Zoning Bylaws, Schedule of Principal Use Regulations, <https://ecode360.com/attachment/MA3212/MA3212-230a%20Sch%20of%20Principal%20Use%20Regs.pdf>

⁷⁴ Id.

explicitly prohibited in any other residential district.⁷⁵ Mansfield has adopted an inclusionary zoning ordinance.⁷⁶

Middleborough

In Middleborough, single-family dwellings are permitted as of right in all residential and general use districts.⁷⁷ Two family and multi-family homes are prohibited in all residential districts and are only permitted by special permit in two general use districts.⁷⁸ The code does not have a provision for inclusionary zoning or a density bonus.

North Attleboro

Single family homes are permitted in all residential districts, two family homes are permitted in two of the residential districts.⁷⁹ Multifamily homes with less than 3 units are only permitted in one of the four residential districts, and by special permit in another. Those with more than three units are forbidden in all but one residential district, but all multifamily buildings are permitted in an industrial district. North Attleboro provides for a density bonus, but only in the context of adult retirement communities. In that case, the zoning board may provide additional units if 50% or more of the lot is used for open space, if one unit is designated as low income, or if two units are designated as moderate income.⁸⁰ The bylaws do not contain an inclusionary zoning provision.

Norton

Single family homes are permitted across all residential districts and the village commercial district.⁸¹ Two family homes are only permitted by special permit in the same districts, and multifamily homes are only allowed by special permit in one of the residential district and the village commercial district.⁸² The Norton bylaws contain both an inclusionary zoning provision and a density bonus provision. 10% of units in a new development must be established as affordable housing units, and such units must be integrated in quality and design with the rest of the market rate units.⁸³ Developments where 30% or more of the units are to be affordable housing units can receive a special permit granting up to 3 times the density limit otherwise allowed.⁸⁴

Plainville

Plainville has two residential districts that are strictly zoned single family, but they are permitted across all residential districts and a few others.⁸⁵ Multifamily homes are permitted only in one residential district if they contain less than 4 units, and by permit in the same district if they

⁷⁵ Id.

⁷⁶ <https://ecode360.com/28868006>

⁷⁷ Middleborough Code, Ch. 275 §3.1, <https://ecode360.com/30717749>.

⁷⁸ Id.

⁷⁹ North Attleboro Zoning Bylaws, §V. B.

https://www.nattleboro.com/sites/northattleboroughma/files/file/file/zoning_by-law_book_through_june_2015.pdf.

⁸⁰ Id., §IV.P.

⁸¹ Norton Code, §175-4.2, <https://www.ecode360.com/28321144>.

⁸² Id.

⁸³ Id., §175-19.5.

⁸⁴ Id., §175-19.13.

⁸⁵ Plainville Code, §500-19, <https://ecode360.com/attachment/PL2720/PL2720-500b%20Use%20Reg%20Schedule.pdf>.

contain more than 4 units.⁸⁶ Plainville has an inclusionary zoning provision that applies to senior villages, where a proposed development must set aside 10% of units for affordable units, as well as a general inclusionary zoning ordinance requiring affordability for projects of eight or more units. Additional density bonuses can be provided if additional units are set aside for low- or moderate-income residents.

Raynham

Raynham allows for single family homes in all residential districts, multifamily homes in one residential district, and mobile home parks in the third residential district.⁸⁷ The bylaws do not have a provision for inclusionary zoning or a density bonus.

Seekonk

Seekonk prohibits two-family or multi-family homes in all of the residential districts, and permits them only in one village commercial district.⁸⁸ Single family homes are permitted in all residential districts.⁸⁹ A density bonus is an option for proposed developments of 8 or more units in a Conservation Subdivision that sets aside 10% of units as affordable housing units that are distributed throughout the development and comparable in size and design to the market rate units.⁹⁰

Taunton

Taunton prohibits one, two, three, and multifamily dwellings in either the rural or suburban residential district, allowing them only by special permit in the urban residential district or various commercial districts.⁹¹ The bylaws contain an inclusionary zoning provision with a density bonus. In exchange for an increase in the allowed density, developers have several options, including selling/renting to low- or middle-income households or contributing to the Taunton Municipal Affordable Housing Trust Fund.⁹²

- Lending discrimination

Lending discrimination is a significant contributing factor to segregation, disparities in access to opportunity, and disproportionate housing needs in the Consortium and those fair housing issues along with R/ECAPs in the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area. The Home Mortgage Disclosure Act data below shows that Black and Hispanic borrowers are less successful in their attempts to secure home loans in both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area than are non-Hispanic Whites. Asian applicants have less access to home loans than do non-Hispanic White applicants in the Providence-Warwick, RI-MA Metropolitan Statistical Area, but the difference in the

⁸⁶ Id.

⁸⁷ Raynham Zoning Bylaws, §4.1.1-3, https://www.town.raynham.ma.us/sites/raynhamma/files/uploads/zoning_bylaw_article_4.pdf.

⁸⁸ Seekonk Zoning Bylaws, §4.2.3, https://www.seekonk-ma.gov/sites/seekonkma/files/uploads/zoning_by_laws_thru_2.27.17.pdf.

⁸⁹ Id.

⁹⁰ Id., §9.2.15.

⁹¹ Taunton Zoning Bylaws, §440 Attachment 1, <https://ecode360.com/attachment/TA3214/TA3214-440a%20Table%20of%20Use%20Reg%20Res.pdf>.

⁹² Id., §440-1402.

custom region is relatively small. Access to mortgage credit is often a prerequisite for accessing opportunity and residing in segregated, predominantly non-Hispanic White parts of the Consortium because the vast majority of the housing stock in such areas consists of owner-occupied single-family homes. Additionally, although there are disparities in access to home purchase loans, disparities with respect to refinance and home equity loans are even more severe. Without being able to secure these types of loans, low-income homeowners often struggle to physically maintain their homes, contributing to a cycle of deterioration that reinforces R/ECAPs.

Custom Region, Home Loan Application Origination Rate by Race and Ethnicity, 2014-2017, Home Mortgage Disclosure Act Data

Loan Purpose	White, Not Hispanic	Black, Not Hispanic	Asian, Not Hispanic	Hispanic
Home Purchase	72.3%	63.0%	70.8%	67.8%
Refinance	58.8%	40.8%	58.9%	45.2%
Home Improvement	65.6%	42.4%	59.0%	48.3%

Providence-Warwick, RI-MA Metropolitan Statistical Area, Home Loan Application Origination Rate by Race and Ethnicity, 2014-2017, Home Mortgage Disclosure Act Data

Loan Purpose	White, Not Hispanic	Black, Not Hispanic	Asian, Not Hispanic	Hispanic
Home Purchase	72.4%	64.0%	69.0%	61.7%
Refinance	57.0%	39.5%	49.6%	41.6%
Home Improvement	61.3%	36.1%	44.6%	31.9%

In addition to the ability to secure a home loan, the terms and pricing of its originated mortgages often result in lending discrimination. As the tables below reflect, in both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, Black and Hispanic borrowers are more likely to receive high cost home loans across multiple purposes. Subprime lending appears to be more pervasive across all racial and ethnic groups in the Providence-Warwick, RI-MA Metropolitan Statistical Area than it is in the custom region. In the custom region, Black applicants encounter the harshest disparities whereas, in the Providence-Warwick, RI-MA Metropolitan Statistical Area, Black and Hispanic borrowers have similar outcomes.

Custom Region, Percentage of Originated Home Loans That Were High Cost by Race and Ethnicity, 2014-2017, Home Mortgage Disclosure Act Data

Loan Purpose	White, Not Hispanic	Black, Not Hispanic	Asian, Not Hispanic	Hispanic
Home Purchase	2.8%	8.6%	0.7%	5.9%
Refinance	0.9%	2.1%	0.4%	1.1%
Home Improvement	1.8%	5.9%	0.9%	2.8%

Providence-Warwick, RI-MA Metropolitan Statistical Area, Percentage of Originated Home Loans That Were High Cost by Race and Ethnicity, 2014-2017, Home Mortgage Disclosure Act Data

Loan Purpose	White, Not Hispanic	Black, Not Hispanic	Asian, Not Hispanic	Hispanic
Home Purchase	4.5%	10.2%	4.1%	11.0%
Refinance	1.7%	3.5%	1.3%	5.2%
Home Improvement	6.0%	16.3%	5.7%	13.7%

These apparent patterns in subprime lending were even more pronounced during the run-up to the foreclosure crisis. In Providence, the city government sued Santander Bank for alleged lending discrimination in 2014. The case settled after the bank agreed to provide \$1.3 million in grants to organizations working in low and moderate-income neighborhoods in the city.

- Location and type of affordable housing

The location and type of affordable housing is a significant contributing factor to segregation and disparities in access to opportunity for residents of publicly supported housing in the City of Taunton, the Consortium, the custom region, and the Providence-Warwick, RI-MA. A vastly disproportionate share of hard units of publicly supported housing within the Consortium are in the relatively heavily Black and Hispanic City of Taunton, and, regionally, hard units of publicly supported housing are even more skewed toward heavily Black and Hispanic cities like Providence, Pawtucket, Brockton, and New Bedford as well as the predominantly non-Hispanic White but relatively low-opportunity City of Fall River. At the pace of current affordable housing production, it would take decades of development consistent with changed priorities to truly transform the options that are available to disproportionately Black and Hispanic low-income renters. In the meanwhile, the preservation of affordable housing that already exists within R/ECAPs and other heavily Black and Hispanic areas regionally requires the use of resources to prevent involuntary displacement and the efficient use of resources, further slowing the realignment of publicly supported housing resources toward high-opportunity areas. The prevalence of inclusionary zoning in high-opportunity areas in Massachusetts in response to Chapter 40B mitigates these patterns to some extent.

Within high-opportunity areas and other places with disproportionately non-Hispanic White population in the Consortium, a large share of affordable housing is restricted to seniors. Although seniors undoubtedly have great need for affordable housing, a higher proportion of the low-income non-senior population consists of Black and Hispanic individuals. Family-occupancy housing, in which seniors can reside as well, creates more opportunities for these individuals and has the potential to increase residential integration and access to opportunity.

- Loss of Affordable Housing

Loss of affordable housing is a contributing factor to Segregation. Due to the suburban and rural nature of the Consortium cities, affordable rental housing for low-income families and the elderly remains scarce. Coupled with resistance from city governments⁹³ and residents⁹⁴ about the construction of new affordable housing developments, the demand continues to grow while supply is hard to come by. Because the supply is so scarce, the termination of subsidies for low-income and senior housing could have a dramatic effect. In Attleboro, the subsidy for 25 Section 8 units and 100 low income family units ended in 2017.⁹⁵ A subsidy for 36 LIHTC units as part of Phase II of the Village of Mansfield Project expired in January 2018.⁹⁶ A few terminations will also come in the near future. In Raynham, the subsidy for 19 LIHTC units at Riverview Meadows will expire in 2019,⁹⁷ and the subsidy for 62 Section 8 units at a property run by the Raynham Housing Authority will expire in 2020.⁹⁸ A subsidy for acquisition assistance in Taunton is also set to expire in 2019.⁹⁹ “Units at Risk” for 2018 include 209 in Attleboro, 14 in Lakeville, 32 in Middleboro, 24 in Norton, and 344 in Taunton.

- Occupancy codes and restrictions

The State of Massachusetts has not adopted the Uniform Housing Code. Instead, the state produces the Massachusetts State Building Code, which is an amended and combined version of various international building and regulatory codes.¹⁰⁰ The state code doesn’t contain any explicit definitions of family, nor does it explicitly restrict where voucher holders are allowed to live. However, with regards to public housing, the state does not place overly restrictive parameters on the definition of family for those in public housing. A family can consist of any

⁹³ Charles Winokoor, *Downtown Taunton 38 Unit Apartment Project Heading for Final ZBA Vote*, Taunton Gazette (Nov. 13, 2018, 1:11 PM), <http://www.tauntongazette.com/news/20181113/downtown-taunton-38-unit-apartment-project-heading-for-final-zba-vote>.

⁹⁴ Stephen Peterson, *Residents Concerned with Plainville Development Plans*, The Sun Chronicle (Apr. 10, 2018), http://www.thesunchronicle.com/news/local_news/residents-concerned-with-plainville-development-plans/article_7ee45dc8-50e4-5b2e-8efd-a5c4c43bad37.html (In Plainville, there was resistance to planned affordable senior housing. Some argue that will free up other housing in the area, but most are concerned with burden on neighboring golf course and town resources.)

⁹⁵ <https://nhpd.preservationdatabase.org/Data/Details/473a0d1f-c1ff-e611-8115-74d435edc0c2>

⁹⁶ <https://nhpd.preservationdatabase.org/Data/Details/40f8f430-c1ff-e611-8115-74d435edc0c2>

⁹⁷ <https://nhpd.preservationdatabase.org/Data/Details/165ef536-c1ff-e611-8115-74d435edc0c2>

⁹⁸ <https://nhpd.preservationdatabase.org/Data/Details/70a00425-c1ff-e611-8115-74d435edc0c2>

⁹⁹ <https://nhpd.preservationdatabase.org/Data/Details/e13466ba-c1ff-e611-8115-74d435edc0c2>

¹⁰⁰ <https://www.mass.gov/handbook/ninth-edition-of-the-ma-state-building-code-780> (The 9th Edition consists of a combination of the International Building code, the International Residential Code, the International Existing Building Code, the International Mechanical Code, the International Energy Conservation Code, the International Swimming Pool and Spa Code, and the International Fire Code.)

two or more persons who are either related and are contributing resources to meet the household's needs.¹⁰¹ Individually, each of the cities within the consortium also has fairly broad definitions of families.

Attleboro

Attleboro defines a family as “one or more individuals constituting a single house-keeping unit.”¹⁰² There are no explicit restrictions on where voucher holders are able to live.

Berkley

Berkley does not define a family in the zoning bylaws and does not explicitly restrict where voucher holders can live. However, the bylaws do restrict multi-family dwellings from having more than 4 units, which may have an indirect effect on the number and location of available rental units for voucher holders.¹⁰³

Carver

The Town of Carver does not define a family, nor does it restrict where voucher holders are able to live.

Dighton

Dighton zoning bylaws broadly define a family as “any number of individuals living and cooking together on the premises as a single housekeeping unit.”¹⁰⁴ The bylaws do not restrict voucher holders.

Lakeville

A family is defined by the Lakeville bylaws as “One or more individuals living together as a single housekeeping unit.”¹⁰⁵ Though they do not explicitly restrict voucher holders, the city's 2012 Housing Production Plan found that Lakeville's zoning bylaws do not promote multi-family housing structures, which may impact the options of voucher holders. In analyzing the zoning laws, the report found that because “the current residential zoning districts require a minimum lot size of 70,000 sq. ft. and 175 feet of frontage...this minimum lot size promotes large lot single-family housing,” creating a “limited availability of housing units in two-, three-, and four-family housing structures.”¹⁰⁶

Mansfield

Mansfield bylaws define a family as “an individual or two or more persons related by blood, marriage, or legal adoption living as a single housekeeping unit and including necessary home help” or “a group of individuals not related by blood, marriage, or legal adoption but living together as a single housekeeping unit may constitute a family.”¹⁰⁷

¹⁰¹ 760 CMR § 5.03 <http://www.attleborohousing.org/760cmr5.pdf>

¹⁰² §17-11.2| <https://www.cityofattleboro.us/DocumentCenter/View/379/Zoning-Ordinance-PDF>

¹⁰³ http://townofberkleyma.com/Pages/BerkleyMA_Planning/Zoning%20Dec%202014.pdf

¹⁰⁴ §6| <http://www.dighton-ma.gov/Zoning%20Bylaws.pdf>

¹⁰⁵ §2.0| https://www.lakevillema.org/sites/lakevillema/files/uploads/2018zoningbylawatmrevised_0.pdf

¹⁰⁶ https://www.mass.gov/files/documents/2016/07/wb/lakeville_1.pdf

¹⁰⁷ §230-1.5| <https://www.ecode360.com/28866895>

Middleborough

A family is defined by the Middleborough bylaws as either “one or more persons related by blood, marriage or adoption and sharing cooking, storage, bathroom, living and sleeping facilities in a dwelling as a single housekeeping unit.”¹⁰⁸ Also included are domestic partners, up to two boarders, and up to four additional unrelated persons.¹⁰⁹ Though voucher holders are not explicitly restricted, the Zoning Map does not allow for any two-family or multifamily dwellings in any of the three residential districts.¹¹⁰ They are allowed by special permit in the two general use areas—but this limits options for development, and therefore potentially voucher holders.

North Attleboro

North Attleboro has a broad definition of family that includes groups of related or unrelated persons “living as a single housekeeping unit.”¹¹¹ The bylaws do not explicitly restrict voucher holders.

Norton

Norton bylaws define a family as “one or several individuals occupying a dwelling as a single housekeeping unit. A family shall not include more than six persons not related to the remaining members of the family by blood, marriage, or legal adoption.”¹¹²

Plainville

The Town of Plainville has one of the broader definitions, defining a family as “any number of individuals living and cooking together on the premises as a single housekeeping unit.”¹¹³ The bylaws do not explicitly restrict voucher holders.

Raynham

Raynham has the least restrictive definition a family. The bylaws classify a family as any “one or more persons occupying a dwelling unit.”¹¹⁴ The bylaws do not explicitly restrict voucher holders.

Seekonk

Seekonk bylaws define a family as any group of people who are related, or up to four people who are unrelated.¹¹⁵ The bylaws do not explicitly restrict voucher holders.

- Private discrimination

Document and statistics requests have been submitted to local fair housing nonprofits, and public records requests need to be submitted to HUD and the Massachusetts Department of Housing and Community Development. At this time there is not comprehensive data about private

¹⁰⁸ §3.1| <https://ecode360.com/30718498?highlight=families,family#30718498>

¹⁰⁹ id.

¹¹⁰ <http://www.middleborough.com/documents/MiddleboroughZoningMap6-30-08.pdf>

¹¹¹ §IX. B| https://www.nattleboro.com/sites/nattleboroughma/files/file/file/zoning_by-law_book_through_june_2015.pdf

¹¹² §175-2.2| <https://www.ecode360.com/28321064>

¹¹³ §500-43 |<https://ecode360.com/11815669>

¹¹⁴ §10| https://www.town.raynham.ma.us/sites/raynhamma/files/uploads/zoning_bylaw_article_10.pdf

¹¹⁵ §1.3| https://www.seekonk-ma.gov/sites/seekonkma/files/uploads/zoning_by_laws_thru_2.27.17.pdf

discrimination in the Taunton Consortium. What is known is that there have been two DOJ settlements in the last three years with North Attleboro-based company J & R Associates for discrimination based on familial status and on race/national origin, and a settlement with the Massachusetts AG's Office concerning private source of income discrimination in the city of Taunton. According to statistics submitted by SouthCoast Fair Housing, since 2015 they have received 19 housing discrimination complaints.

Disability	9
Source of income	5
Sexual Orientation	1
Race	3
Sex	1

- Source of income discrimination

Source of income discrimination occurs when landlords refuse to rent to people with Section 8 vouchers to subsidize their rent payments. Discrimination based on source of income can severely restrict the rental properties available to people with Section 8 vouchers, frustrating the goals of the federal program to ensure that people can rent properties close to their places of work and with features that will suit their needs. Under Massachusetts state law, it is illegal to discriminate against Section 8 voucher holders in rental agreements.¹¹⁶ However, source of income discrimination is still common because landlords are unfamiliar with the state law. There were two instances of source of income discrimination in LIHTC properties within the consortium.

- Other

N/A

¹¹⁶ <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXXI/Chapter151B/Section4>

B. GENERAL ISSUES

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

R/ECAPs are geographic areas with significant concentrations of poverty and minority populations. 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 regards to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower.

Where one lives has a substantial effect on mental and physical health, education, crime levels, 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 the availability of affordable housing and proximity to job centers. Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. 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 is important in order to better understand entrenched patterns of segregation and poverty.

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

There are no R/ECAPs within the Taunton Consortium. There are several within the greater region and just outside the region; those just outside the region are close enough to some population centers in the Consortium to be relevant to this analysis.

There are two R/ECAPs in the northern portion of the region. The R/ECAPs border each other, and are located in downtown Brockton, MA. The two R/ECAPs are bounded by Prospect Street and Wyman Street to the north, Belmont Avenue to the West, the railroad tracks to the east of North Montello Street to the east, and the combination of Lawrence Street, Winthrop Street, Bartlett Street, and Highway 123 to the south. The two R/ECAPs border each other but are divided by Warren Avenue.

There are four R/ECAPs in the southern portion of the region, all located in New Bedford, MA:

One R/ECAP is bounded to the north by the railroad tracks parallel to Purchase Street. The western boundary is formed by Shawmut Avenue. The southernmost boundary is formed by Highway 195. To the east, a piece at the top is carved out by Purchase Street and Van Buren Street, continuing south along Myrtle Street.

To the east of that, there is a second R/ECAP bounded to the north by Sawyer Street and to the east by the River. To the west, it is bounded by Country Street at its northernmost point, then

cuts east along Highway 195 to Highway 18, until it hits Wamsutta Street, its southernmost boundary.

A third R/ECAP farther south is bounded to the north by North Street, to the South by Arnold Street, to the west by Chancery Street, and to the east by County Street.

The fourth R/ECAP is bounded by the river to the east, including Palmer Island. The western boundary is formed by Pleasant Street/County Street, and cuts to the east at Thompson Street/Potomska Street and continues south along South Front Street until Gifford Street, which goes to the river.

Just outside of the region, there are nine R/ECAPs in Providence, RI which may be relevant to this analysis:

The northernmost R/ECAP is roughly bounded by a line just south of Clay Street, and by the river to the east. The western boundary roughly follows Dexter Street/George Street, and the southern boundary roughly aligns with Highway 95.

To the south, one R/ECAP is bounded to the east by Old Louisquisset Pike. Its northwestern boundary zigzags along Vandewater Street, Cornwall Street, Lancashire Street, Glasgow Street, Virginia Lane, Douglas Avenue, and Admiral Street, before cutting a fairly uniform chunk along Huxley Avenue and Eaton Street and following Highway 7 toward Fillmore Street and across to the Pike.

There is a large cluster of five R/ECAPs, all roughly bordering each other, just south of that. To the north, the group is bordered by Atwells Avenue, cuts south along Knight Street and Courtland Street, and continues east along Westminster Street until hitting Highway 95. It then cuts south along Plain Street until Dudley Street. To the west, it carves out an inverse triangle bound by Broad Street and Highway 1 before continuing west along Cromwell Street and north along Dexter Street up to Westminster Street. It continues along Westminster Street/Hartford Avenue, and follows Highway 6 toward roughly Salmon Street, where it rejoins with Atwells Avenue.

The two southernmost R/ECAPs border each other, roughly bounded to the south by Highway 95. The northern border is bounded by Ontario Street. The western boundary is roughly formed by the railroad tracks east of Highway 1. The eastern boundary is formed by Eddy Street, and the two R/ECAPs are divided by Broad Street.

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

Table 1 R/ECAP Population by Race and Ethnicity – Taunton Region

	CNSRT-Taunton, MA Custom Region	
R/ECAP Race/Ethnicity	#	%
Total Population in R/ECAPs	17,730	-
White, Non-Hispanic	5,549	31.30%
Black, Non-Hispanic	4,552	25.67%
Hispanic	3,920	22.11%
Asian or Pacific Islander, Non-Hispanic	249	1.40%
Native American, Non-Hispanic	112	0.63%
Other, Non-Hispanic	2,131	12.02%

Table 2 R/ECAP Population by Race and Ethnicity – Providence, RI

	(Providence, RI CDBG, HOME, ESG) Jurisdiction	
R/ECAP Race/Ethnicity	#	%
Total Population in R/ECAPs	28,850	-
White, Non-Hispanic	5,499	19.06%
Black, Non-Hispanic	5,091	17.65%
Hispanic	15,544	53.88%
Asian or Pacific Islander, Non-Hispanic	1,150	3.99%
Native American, Non-Hispanic	300	1.04%
Other, Non-Hispanic	296	1.03%

Table 3 Top National Origins for Individuals in R/ECAPs – Taunton Region

R/ECAP National Origin			
#1 country of origin	Cape Verde	1,250	7.05%
#2 country of origin	Haiti	967	5.45%
#3 country of origin	Guatemala	491	2.77%
#4 country of origin	Portugal	288	1.62%
#5 country of origin	Brazil	166	0.94%
#6 country of origin	El Salvador	146	0.82%
#7 country of origin	Dominican Republic	113	0.64%
#8 country of origin	Vietnam	95	0.54%
#9 country of origin	Other Eastern Africa	94	0.53%
#10 country of origin	Other Middle Africa	75	0.42%

Table 4 Top National Origins for Individuals in R/ECAPs – Providence, RI

R/ECAP National Origin			
#1 country of origin	Dominican Republic	5,453	18.90%
#2 country of origin	Guatemala	1,450	5.03%
#3 country of origin	Liberia	370	1.28%
#4 country of origin	Other South Central Asia	323	1.12%
#5 country of origin	Mexico	284	0.98%
#6 country of origin	Ecuador	188	0.65%
#7 country of origin	Haiti	186	0.64%
#8 country of origin	Cape Verde	184	0.64%
#9 country of origin	Cambodia	150	0.52%
#10 country of origin	El Salvador	143	0.50%

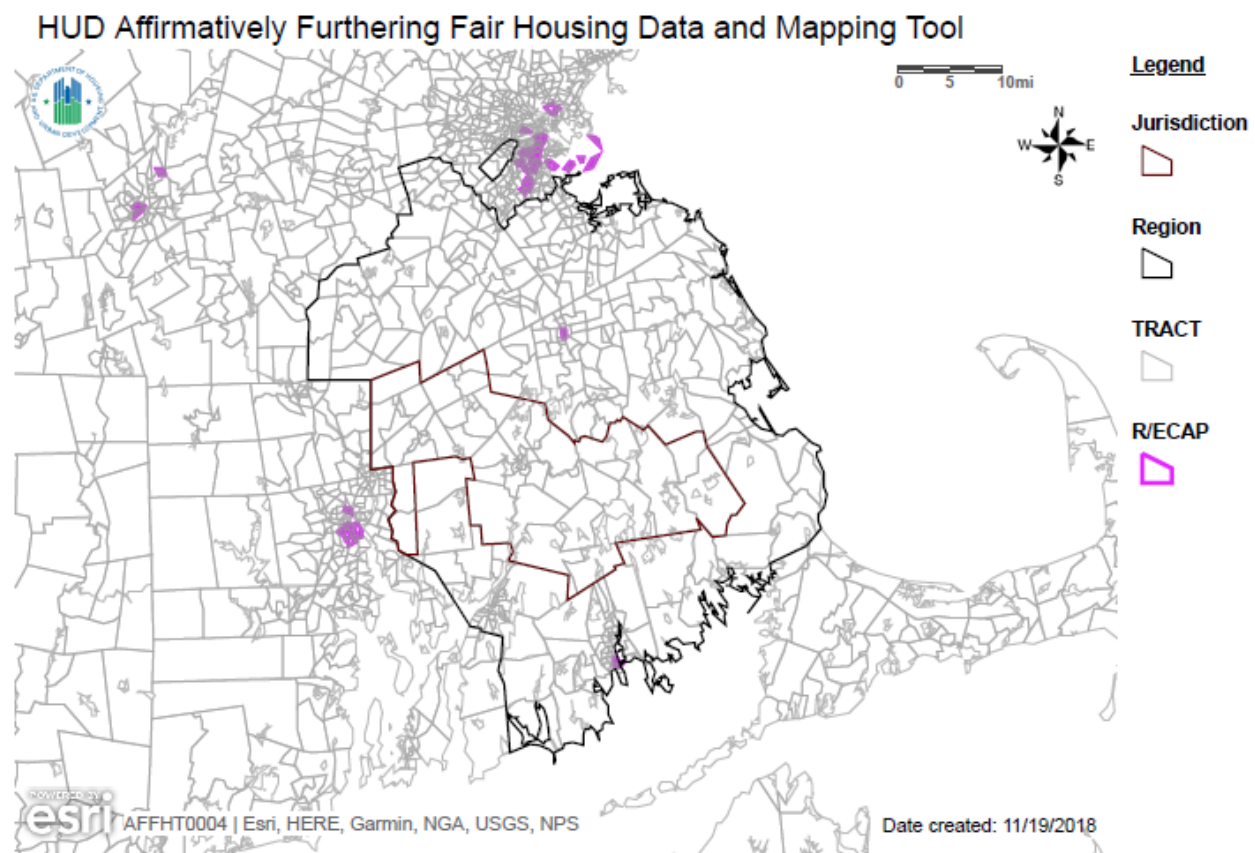
The differences in racial composition of the regional R/ECAPs and the region as a whole are very stark, with Hispanics and African Americans making up the most disproportionately large percentage of residents. Hispanics residents comprise approximately 22% of all individuals living in R/ECAPs in the Region and 54% of individuals in the R/ECAPs in Providence, while making up approximately 4% of the Region's population. Black residents also constitute a disproportionate of R/ECAP residents in the City and the region. Black residents are

approximately 26% of the region's R/ECAPs and 18% of the R/ECAPs in Providence but make up only 5% of the regional population. The share of Asian Americans in the R/ECAPs in the region and in Providence are smaller than the overall proportion of Asian Americans in the region. The share of Native Americans in the R/ECAPs is larger, but at such small numbers, while the percentage increase is dramatic, the raw numbers are not.

In terms of national origin, people from Cape Verde, Haiti, and Guatemala disproportionately reside in the region's R/ECAPs. In the Providence R/ECAPs, Dominicans disproportionately reside there, notable because the Dominican Republic does not even make the list of top ten national origins in the nearby Taunton Consortium.

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

Map 1: R/ECAPs 1990, Taunton Consortium



Name: Map 2 - Race/Ethnicity Trends

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

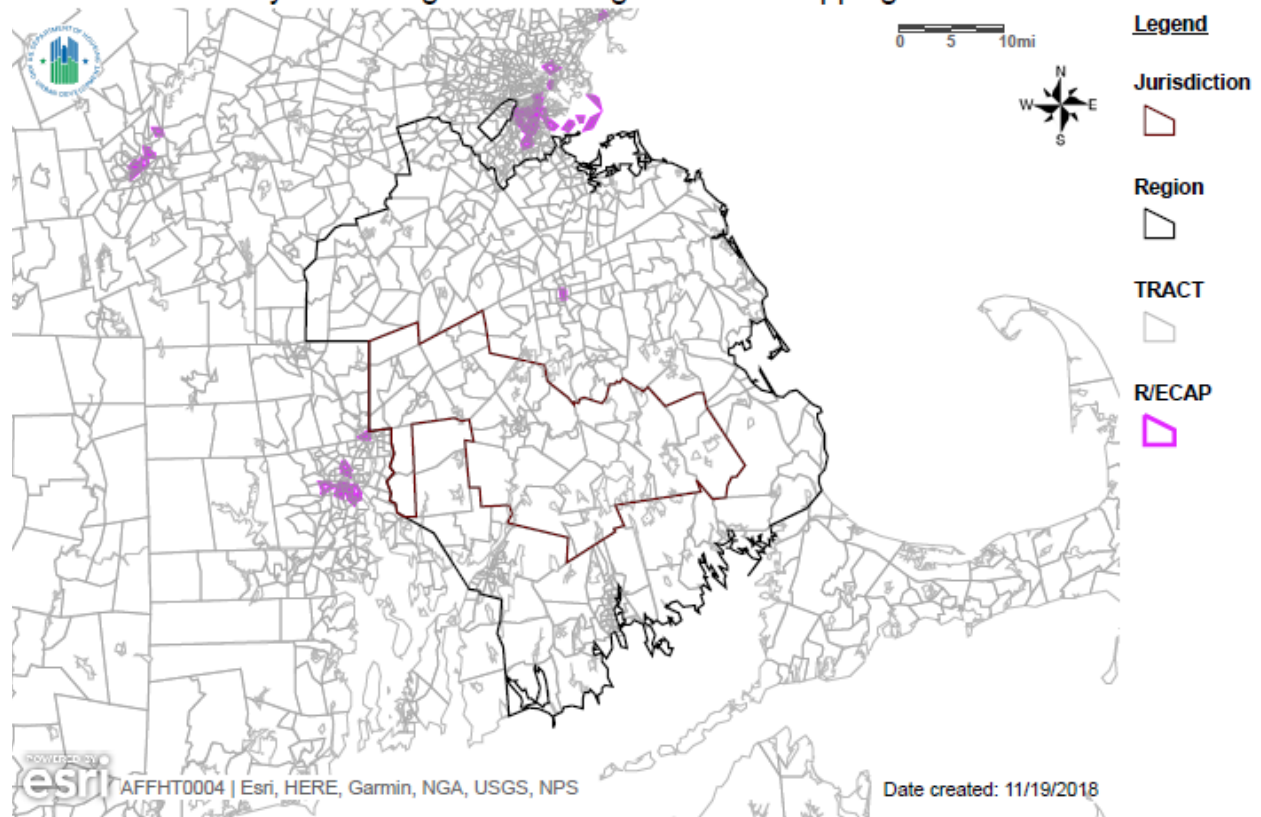
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 2: R/ECAPs 2000, Taunton Consortium

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

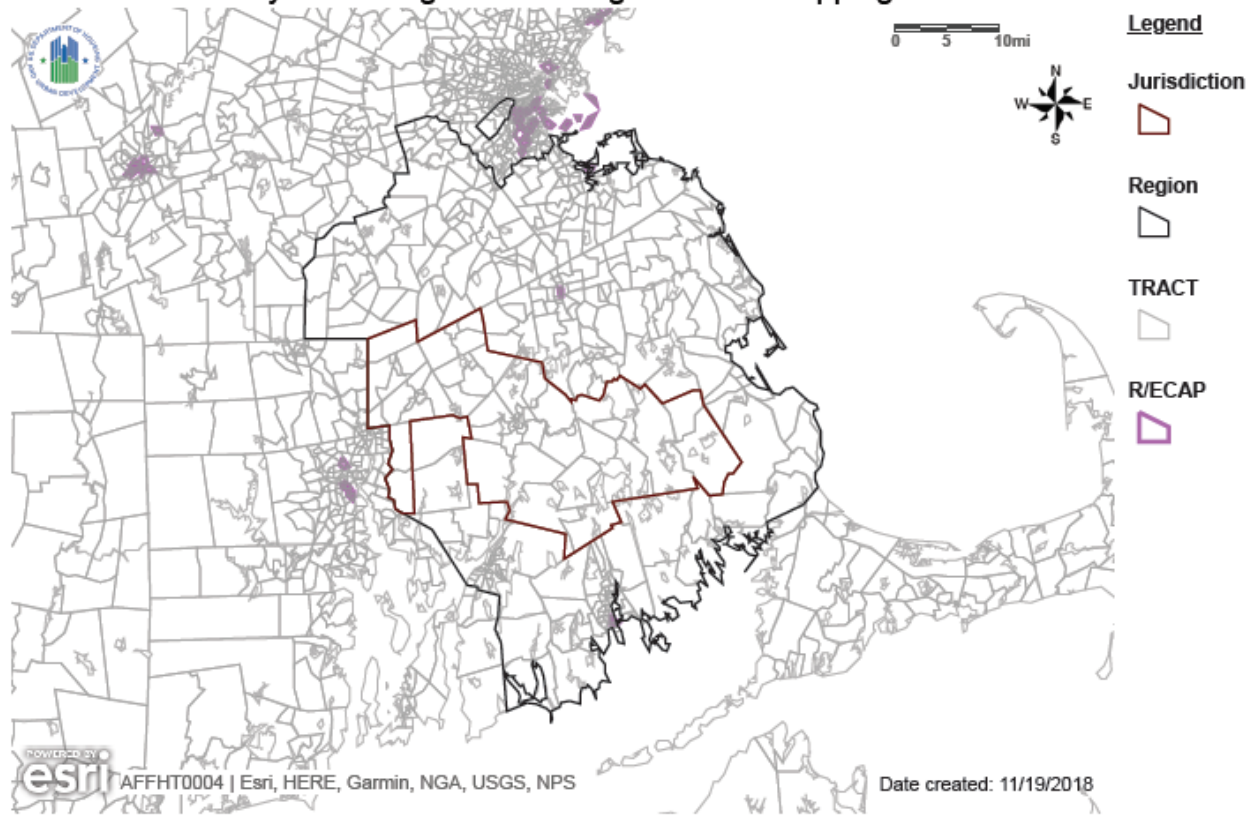
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 3: R/ECAPs 2010, Taunton Consortium

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

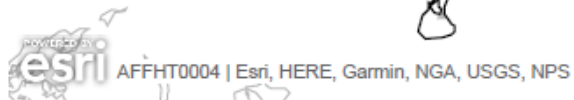
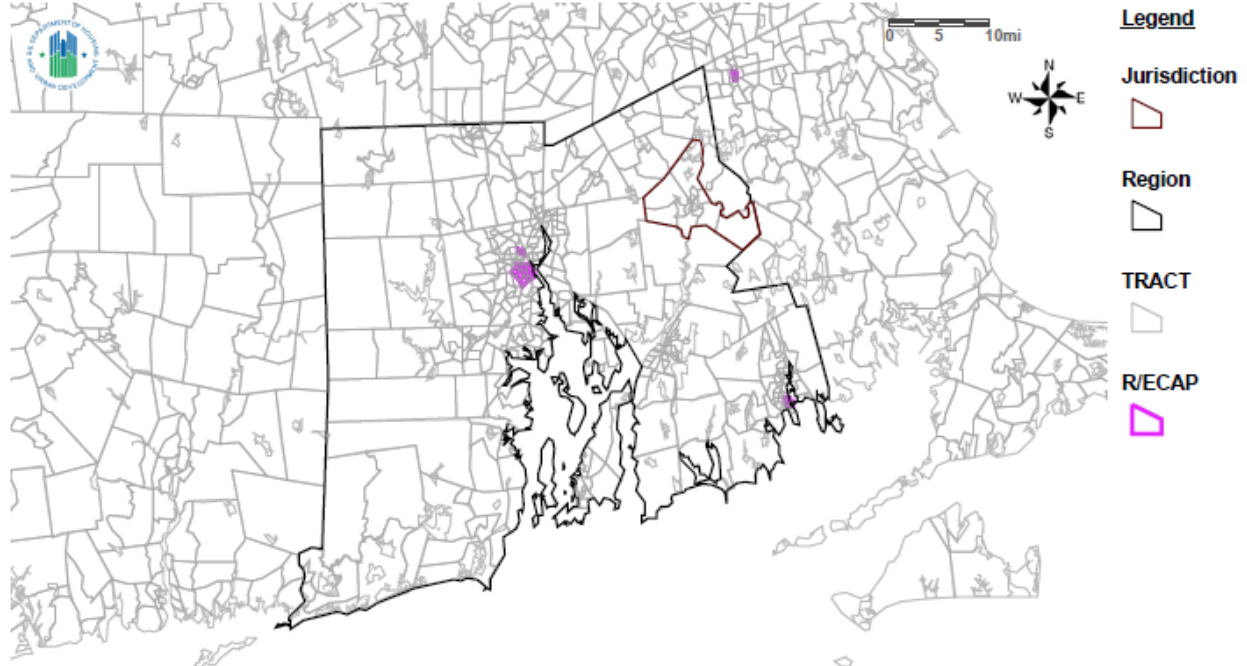
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 4: R/ECAPs 1990, Providence-Warwick, RI-MA Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Date created: 11/19/2018

Name: Map 2 - Race/Ethnicity Trends

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

Jurisdiction: Taunton (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Map 5: R/ECAPs 2000, Providence-Warwick, RI-MA Region HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



POWERED BY
esri AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS

Date created: 11/19/2018

Name: Map 2 - Race/Ethnicity Trends

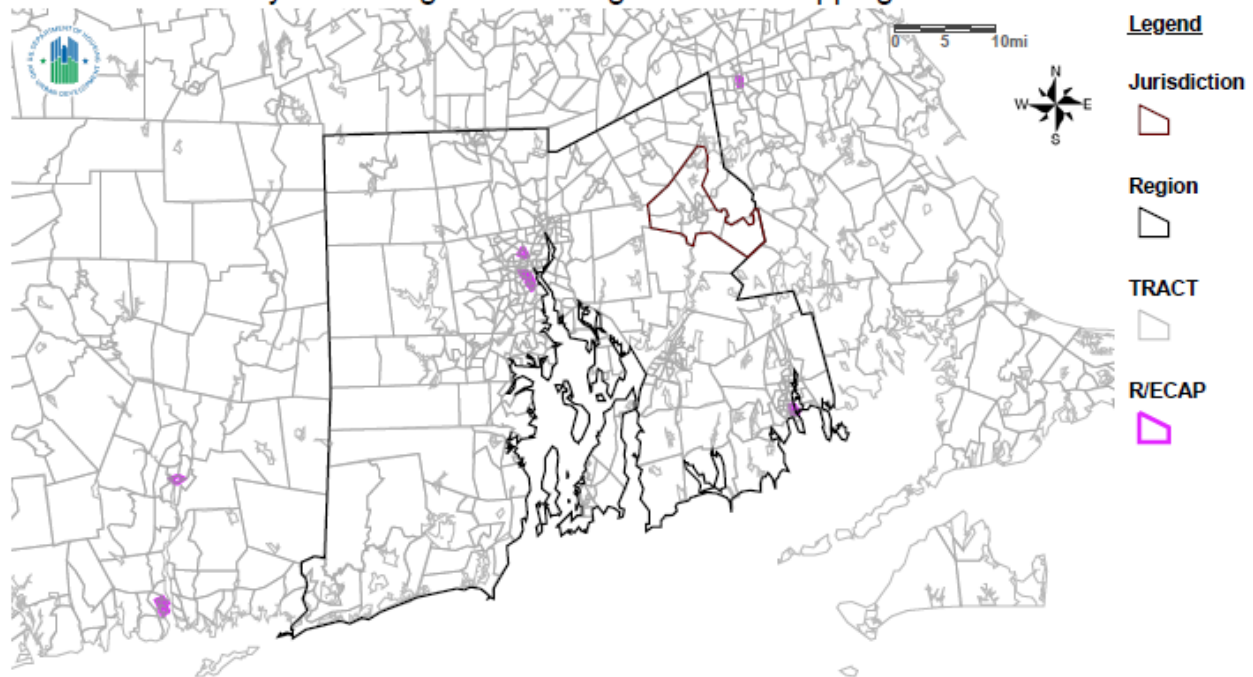
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Taunton (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Map 6: R/ECAPs 2010, Providence-Warwick, RI-MA Region HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



esri AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS

Date created: 11/19/2018

Name: Map 2 - Race/Ethnicity Trends

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

Jurisdiction: Taunton (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Over time, the number of R/ECAPs has increased in some places and decreased in others. Regardless, the actual Taunton Consortium has not had any R/ECAPs across these decades. In 1990, there was only one R/ECAP in Brockton, one of the two that is currently there. Similarly, there was only one of the four current R/ECAPs in New Bedford. Outside the region in Providence, there were 8 R/ECAPs. The majority of these R/ECAPs were clustered in the downtown area, similar to the present day, but there is not a perfect overlap of qualifying census tracts.

In 2000, the amount of R/ECAPs in the region decreased to just one, in Brockton – the same one as in 1990, and one that continues today. There were no R/ECAPs in New Bedford. Outside the region in Providence, there were 14 R/ECAPs. These were mostly clustered in the downtown area, and there is significant overlap between these and the R/ECAPs of the present day.

In 2010, the same R/ECAP in Brockton continued to be there, and the New Bedford R/ECAP from 1990 reappeared. Both of these R/ECAPs continue to qualify in the present day. Outside the region in Providence, there were 5 R/ECAPs, mostly in the downtown area, and with some overlap with the present-day R/ECAPs.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

Although there are no R/ECAPs within the Consortium, one block group within the City of Attleboro is at risk of becoming a R/ECAP. Block Group 1 of Census Tract 6314 has a population that is 52.0% non-Hispanic White and has a poverty rate of 26.4%. By strategically targeting this area for workforce development and job training efforts and affirmatively marketing affordable housing opportunities outside of the area to Hispanic neighborhood residents, the City of Attleboro and the Consortium could strengthen efforts to prevent the Block Group from becoming a R/ECAP.

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

Because of the absence of R/ECAPs from the Consortium, there are no strategies currently in place to address the issue of R/ECAPs; however, the City of Taunton has made place-based investments in its most economically disadvantaged neighborhoods, which have concentrations of people of Portuguese, Azorean, Brazilian, and Cape Verdean national origin.

Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify facts that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Community opposition

Community opposition is discussed in greater detail in the Segregation section. Community opposition is a significant contributing factor to R/ECAPs in the region (though not in the Consortium, since there are no R/ECAPs). By reducing the living options available to current R/ECAP residents outside of R/ECAPs, community opposition reinforces the racial, ethnic, and socioeconomic demographics of R/ECAPs.

- Deteriorated and abandoned properties

Deteriorated and abandoned properties contribute to R/ECAPs regionally but not within the Consortium, which lacks R/ECAPs. Both Brockton and New Bedford, in particular, have had significant issues with vacant and abandoned properties in the wake of the foreclosure crisis and, in collaboration with the Commonwealth of Massachusetts, have adopted programs to mitigate the effects of these properties on their surrounding neighborhoods, including through enforcement action against absentee owners and through sales to low-income homebuyers. Nonetheless, the problem persists and has a causal influence on the economic status of neighborhood residents in R/ECAPs by reducing the home equity of homeowners and by making job-creating businesses less likely to locate in R/ECAPs. Taunton, as an older, industrial city,

also has issues with deteriorated and abandoned properties, but, within that city, such properties do not contribute to R/ECAP conditions.

- Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is discussed in greater detail in the Segregation section. Displacement due to economic pressures is a major contributing factor to R/ECAPs in the region (though not in the Consortium, since there are no R/ECAPs), as the most vulnerable residents living near the poverty line who are displaced from their original homes often end up in R/ECAPs, concentrated with other people displaced by poverty.

- Lack of community revitalization strategies

Lack of community revitalization strategies is discussed in more detail in the Segregation section. Lack of community revitalization strategies is not a significant contributing factor to R/ECAPs in the Consortium because there are none.

- Lack of local or regional cooperation

Lack of local or regional cooperation is discussed in more detail in the Segregation section. Lack of local or regional cooperation is a significant contributing factor to R/ECAPs in the region.

- Lack of private investments in specific neighborhoods

Lack of private investments in specific neighborhoods is discussed in greater detail in the Segregation section. It is not a significant contributing factor to R/ECAPs in the Consortium because there are none.

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

Lack of public investments is discussed in greater detail in the Segregation section. It is not a significant contributing factor to R/ECAPs in the Consortium because there are none.

- Land use and zoning laws

Land use and zoning are discussed in more detail in the Segregation section. It is not a significant contributing factor to R/ECAPs because there are no R/ECAPs in the Consortium.

- Location and type of affordable housing

Location and type of affordable housing is discussed in more detail in the Segregation section. Location and type of affordable housing is not a major contributing factor to R/ECAPs.

- Loss of Affordable Housing

Loss of affordable housing is discussed in more detail in the Segregation section. It is a contributing factor to R/ECAPs in the region but not in the Consortium, as there are none.

- Occupancy codes and restrictions

Occupancy codes and restrictions are discussed in more detail in the Segregation section. It is not a significant contributing factor to R/ECAPs in the Consortium, as there are none, but it may be regionally.

- Private discrimination

Private discrimination is discussed in greater detail in the Segregation section. Private discrimination is not a significant contributing factor to the development of R/ECAPs in the region.

- Source of income discrimination

Source of income discrimination is discussed in greater detail in the Segregation section. Source of income discrimination is not a major contributing factor to R/ECAPs in Massachusetts, since source of income discrimination is illegal.

- Other

N/A

B. GENERAL ISSUES

iii. Disparities in Access to Opportunity

(CNSRT-Taunton, MA CONSORTIA) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	73.18	59.56	65.17	39.15	81.93	13.31	76.33
Black, Non-Hispanic	61.76	60.94	54.86	41.56	86.17	13.19	73.96
Hispanic	58.62	63.43	51.90	44.28	87.42	15.54	70.63
Asian or Pacific Islander, Non-Hispanic	71.82	71.47	67.86	41.39	86.23	17.08	71.31
Native American, Non-Hispanic	67.00	60.14	59.66	42.73	83.73	13.76	74.33
Population below federal poverty line							
White, Non-Hispanic	61.86	57.24	56.33	44.04	84.91	13.39	72.63
Black, Non-Hispanic	50.70	53.43	45.12	42.92	87.48	9.86	76.77
Hispanic	47.57	56.93	39.61	44.22	88.88	11.38	74.12
Asian or Pacific Islander, Non-Hispanic	41.79	79.06	41.22	52.34	93.54	19.34	57.74
Native American, Non-Hispanic	43.05	49.66	33.50	43.53	88.53	12.46	71.49
(CNSRT-Taunton, MA - custom) Region							
Total Population							
White, Non-Hispanic	73.66	63.57	68.15	60.80	82.00	14.75	75.44
Black, Non-Hispanic	54.24	36.79	50.23	76.87	86.11	16.72	70.65
Hispanic	50.21	43.76	46.81	68.10	88.28	15.68	70.07
Asian or Pacific Islander, Non-Hispanic	68.91	62.30	72.29	78.42	87.35	18.29	62.01
Native American, Non-Hispanic	60.06	51.17	54.24	64.43	84.44	14.01	75.34
Population below federal poverty line							
White, Non-Hispanic	56.71	51.90	54.36	65.86	86.61	15.46	71.41
Black, Non-Hispanic	38.42	28.31	37.96	77.73	89.35	17.95	68.70
Hispanic	31.34	30.68	32.36	66.83	92.59	15.65	67.52
Asian or Pacific Islander, Non-Hispanic	54.74	57.03	61.64	81.38	91.59	21.16	54.58
Native American, Non-Hispanic	31.51	31.87	24.29	65.22	91.21	17.78	71.66
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).							

(Taunton, MA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	55.34	51.34	41.49	40.05	87.56	9.04	77.76
Black, Non-Hispanic	43.44	50.29	33.39	43.70	89.64	9.27	74.96
Hispanic	41.67	48.45	32.37	45.11	89.91	9.98	74.14
Asian or Pacific Islander, Non-Hispanic	52.85	51.71	40.43	38.94	87.75	8.13	78.10
Native American, Non-Hispanic	45.15	52.30	33.57	45.79	90.08	10.51	71.61
Population below federal poverty line							
White, Non-Hispanic	40.93	47.71	33.62	46.35	90.40	9.90	73.30
Black, Non-Hispanic	37.33	48.96	31.93	45.01	90.45	8.96	75.13
Hispanic	40.83	51.34	32.47	42.82	89.68	8.46	75.99
Asian or Pacific Islander, Non-Hispanic	19.00	52.45	10.00	55.00	93.00	7.55	66.00
Native American, Non-Hispanic	20.15	51.35	10.29	55.58	93.86	9.99	62.25
(Providence-Warwick, RI-MA) Region							
Total Population							
White, Non-Hispanic	64.78	56.82	60.22	40.32	74.76	34.55	73.22
Black, Non-Hispanic	35.93	31.09	35.75	56.61	83.58	50.51	53.57
Hispanic	29.57	26.12	30.25	59.56	84.05	50.21	50.74
Asian or Pacific Islander, Non-Hispanic	52.80	44.21	51.74	49.91	79.36	51.42	60.64
Native American, Non-Hispanic	46.66	45.08	47.35	48.75	78.87	47.33	64.82
Population below federal poverty line							
White, Non-Hispanic	47.92	45.46	46.88	49.17	80.11	46.24	66.83
Black, Non-Hispanic	23.05	24.29	28.23	60.81	86.09	53.71	47.32
Hispanic	19.47	18.96	22.13	62.26	86.64	50.95	49.88
Asian or Pacific Islander, Non-Hispanic	33.39	32.38	36.05	60.25	86.25	59.45	49.45
Native American, Non-Hispanic	37.13	42.85	44.23	51.48	81.02	58.57	61.19
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).							

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Attleboro, MA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	66.81	80.94	66.41	44.19	89.25	24.26	65.15
Black, Non-Hispanic	62.63	81.68	61.36	45.84	90.05	24.23	63.78
Hispanic	54.94	83.13	51.83	49.87	91.68	23.66	60.24
Asian or Pacific Islander, Non-Hispanic	61.48	82.70	60.05	46.11	90.23	24.31	63.54
Native American, Non-Hispanic	61.89	81.53	58.80	46.64	90.44	24.64	64.69
Population below federal poverty line							
White, Non-Hispanic	62.82	82.12	62.31	45.59	90.10	24.36	64.02
Black, Non-Hispanic	66.00	89.24	65.00	41.00	90.00	21.74	77.00
Hispanic	54.61	88.82	44.61	51.71	92.95	23.00	66.32
Asian or Pacific Islander, Non-Hispanic	27.45	84.50	26.49	59.77	96.20	23.38	47.59
Native American, Non-Hispanic	N/a	N/a	N/a	N/a	N/a	N/a	N/a
(Providence-Warwick, RI-MA) Region							
Total Population							
White, Non-Hispanic	64.78	56.82	60.22	40.32	74.76	34.55	73.22
Black, Non-Hispanic	35.93	31.09	35.75	56.61	83.58	50.51	53.57
Hispanic	29.57	26.12	30.25	59.56	84.05	50.21	50.74
Asian or Pacific Islander, Non-Hispanic	52.80	44.21	51.74	49.91	79.36	51.42	60.64
Native American, Non-Hispanic	46.66	45.08	47.35	48.75	78.87	47.33	64.82
Population below federal poverty line							
White, Non-Hispanic	47.92	45.46	46.88	49.17	80.11	46.24	66.83
Black, Non-Hispanic	23.05	24.29	28.23	60.81	86.09	53.71	47.32
Hispanic	19.47	18.96	22.13	62.26	86.64	50.95	49.88
Asian or Pacific Islander, Non-Hispanic	33.39	32.38	36.05	60.25	86.25	59.45	49.45
Native American, Non-Hispanic	37.13	42.85	44.23	51.48	81.02	58.57	61.19

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

1. Analysis

a. Education

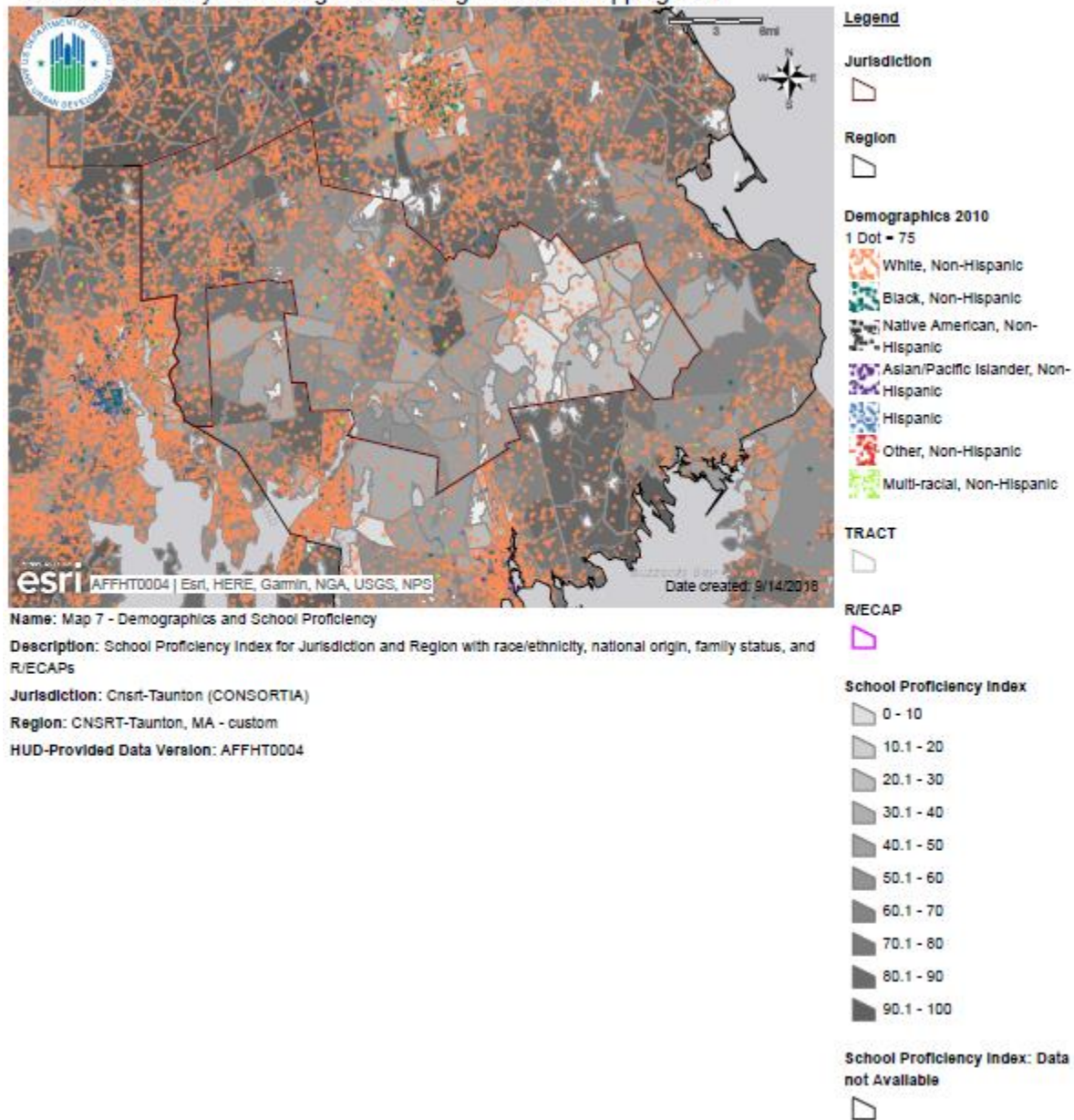
- i. *For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.*

In the Consortium, Asian and Pacific Islander residents have the greatest access to proficient schools while all other racial or ethnic groups have somewhat similar, slightly lower access to proficient schools. In the city of Taunton, all racial and ethnic groups have similar levels of access to proficient schools, and school proficiency is lower than it is in the Consortium as a whole. In the City of Attleboro, all racial and ethnic groups have similar levels of access to proficient schools, and school proficiency is higher than it is in the Consortium as a whole.

In both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, Black and Hispanic residents have significantly lower access to proficient schools than non-Hispanic White residents. In the custom region, Asian and Pacific Islander residents have similar access to proficient schools to that of non-Hispanic White residents, but, in the Providence-Warwick, RI-MA Metropolitan Statistical Area, Asian and Pacific Islander residents have lower levels of access.

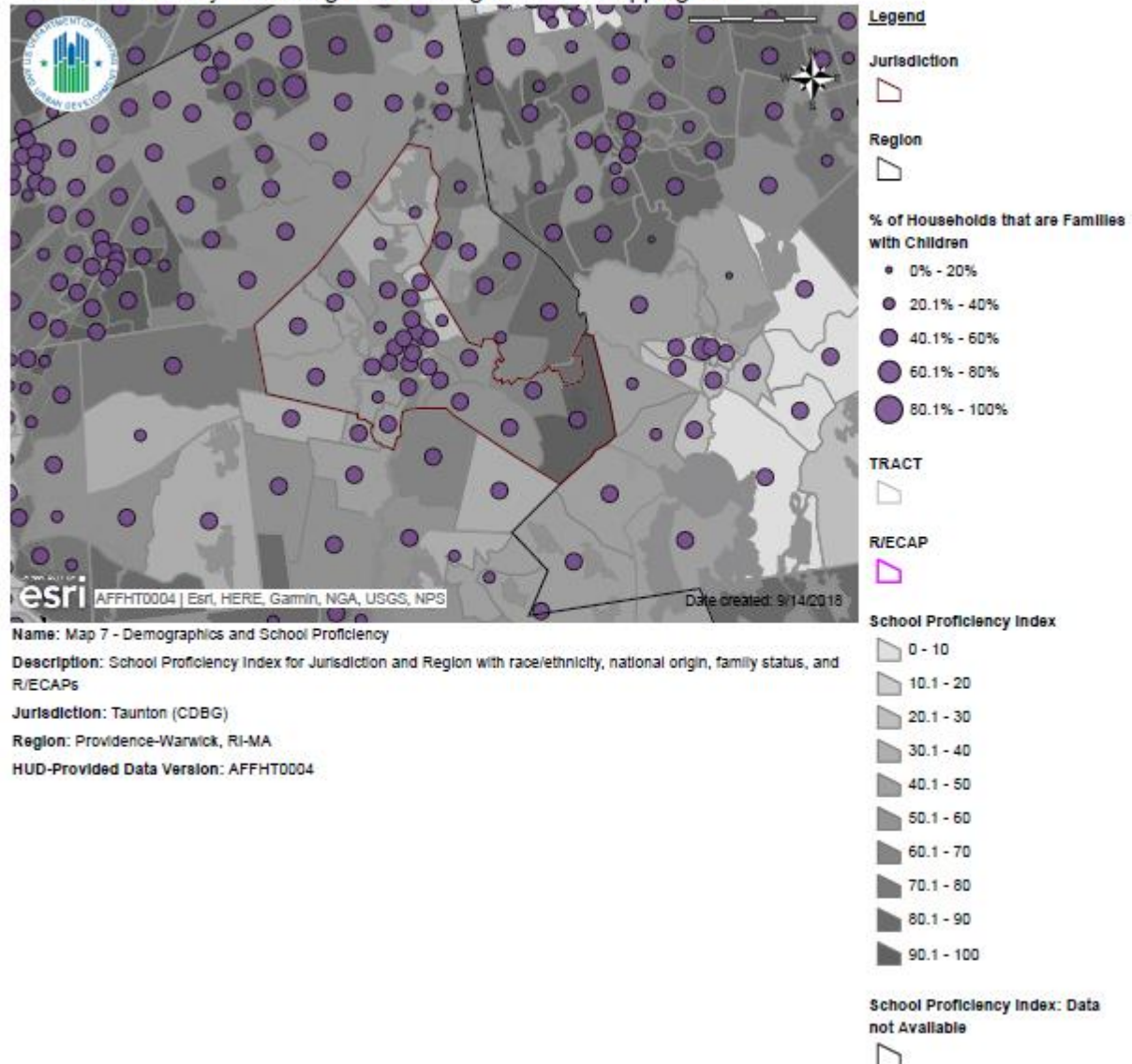
- ii. *For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.*

Map 1: School Proficiency by Race/Ethnicity, Taunton Consortium HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



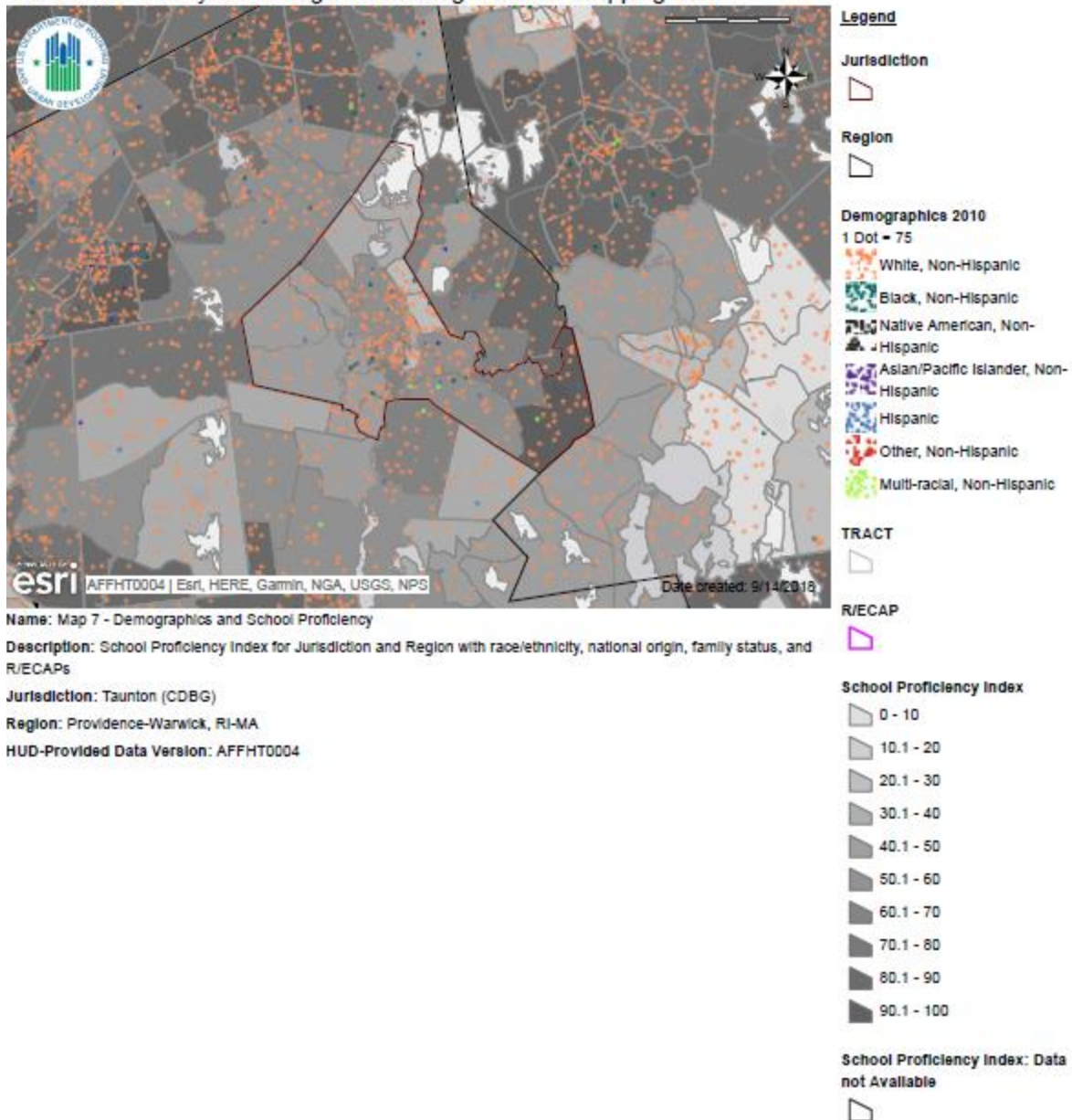
Map 2: School Proficiency by Family Status, Taunton Consortium

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

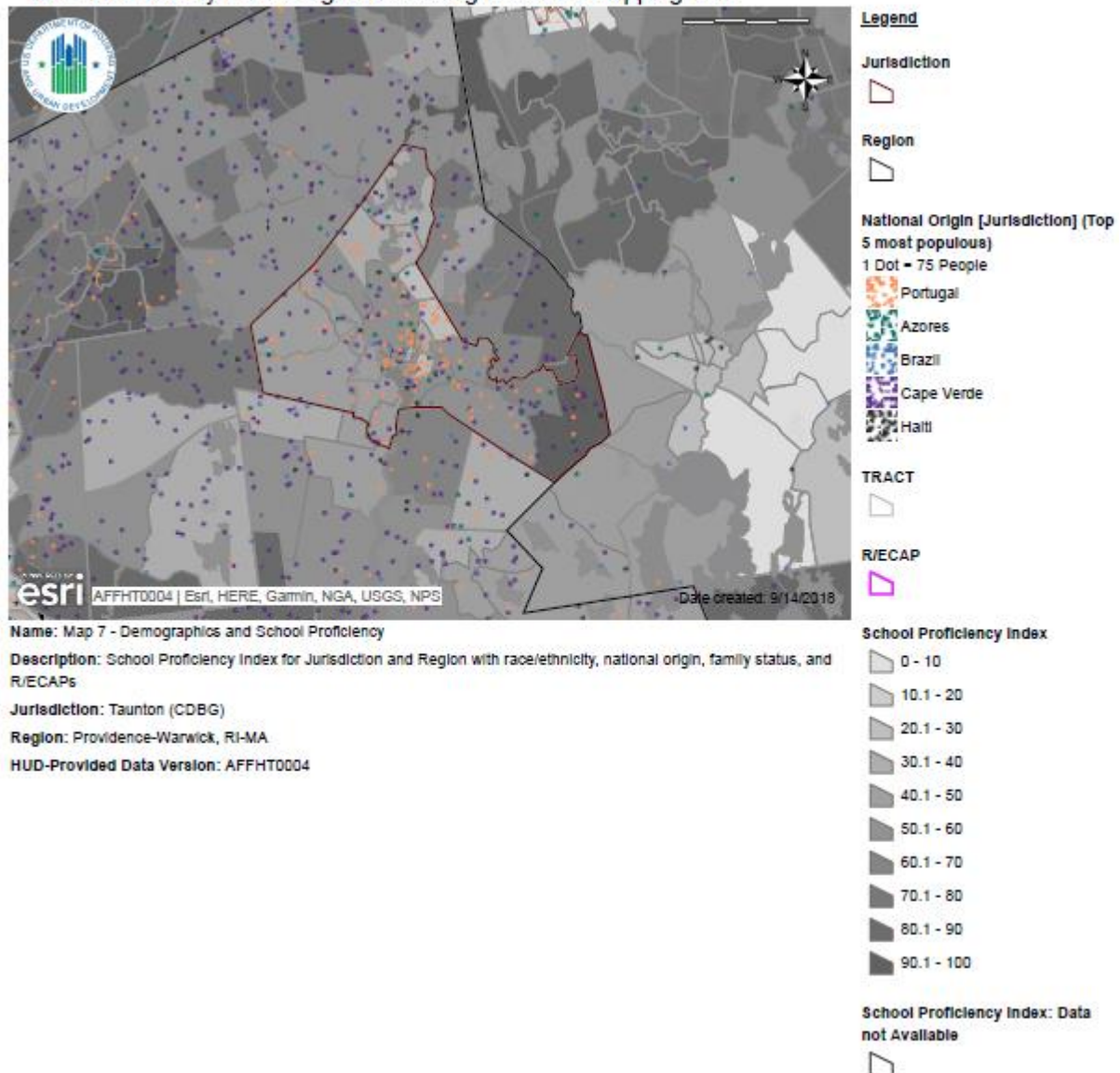


Map 3: School Proficiency by Race/Ethnicity, Taunton, MA

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

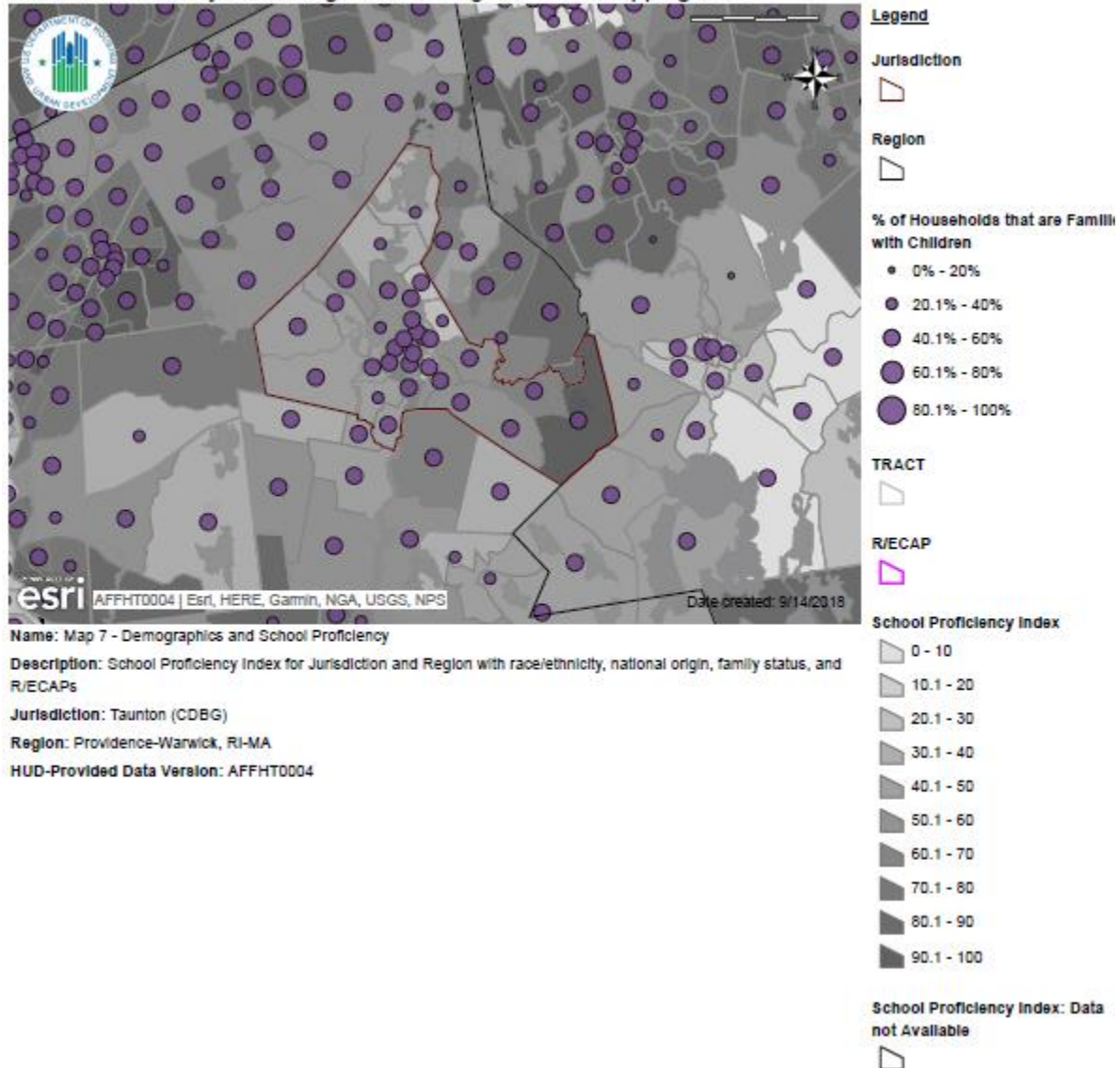


Map 4: School Proficiency by National Origin, Taunton, MA HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

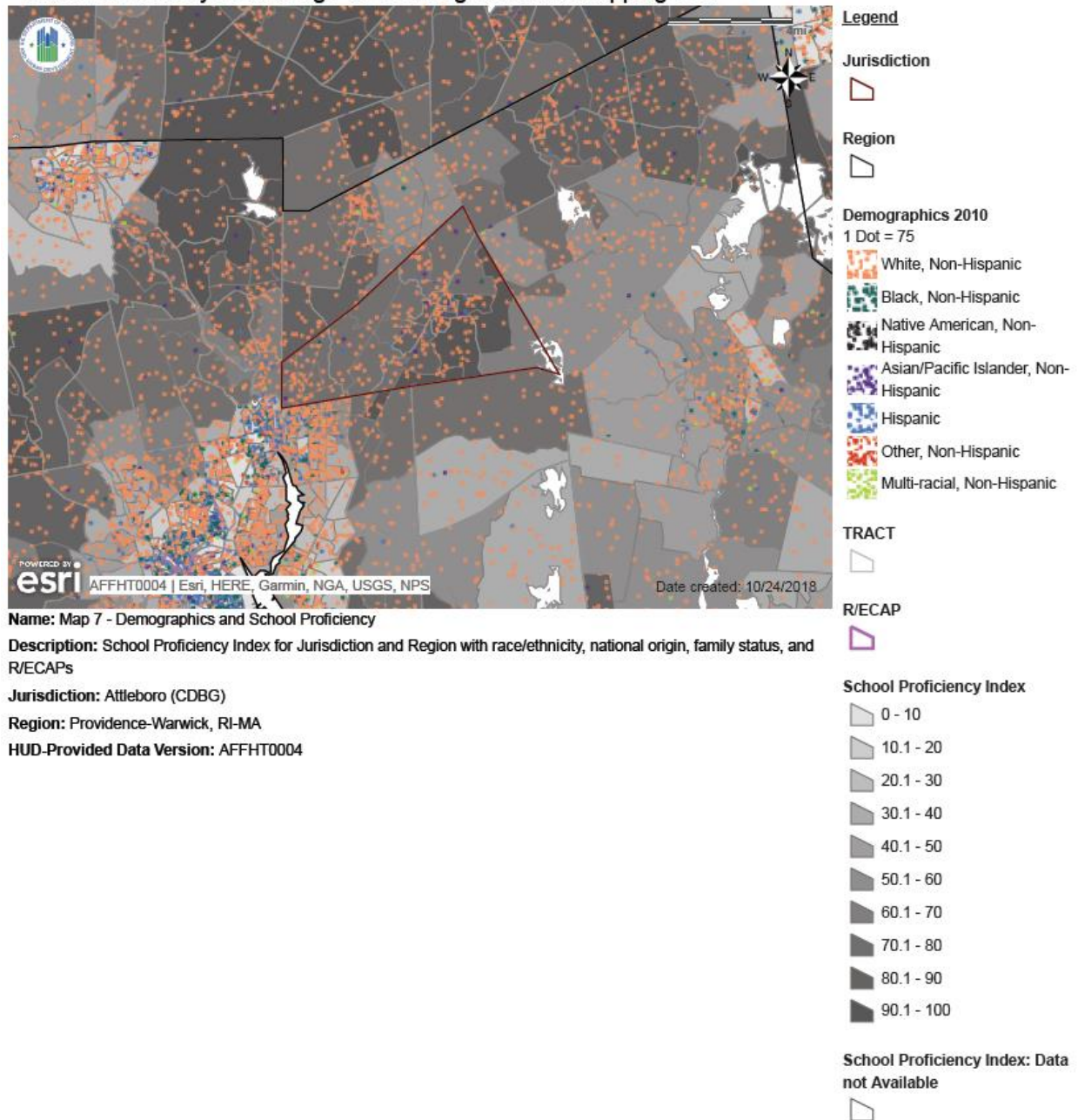


Map 5: School Proficiency by Family Status, Taunton, MA

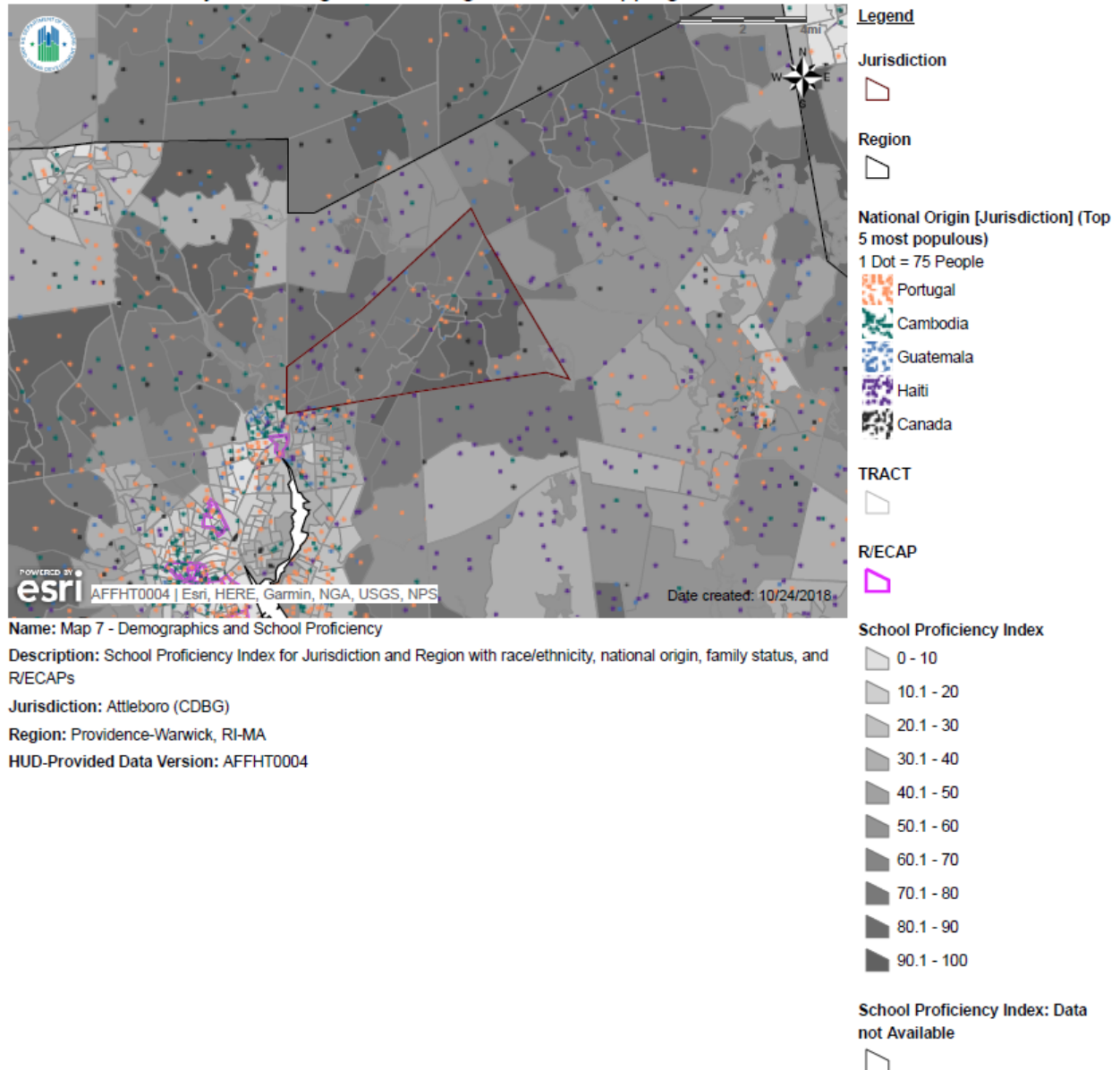
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



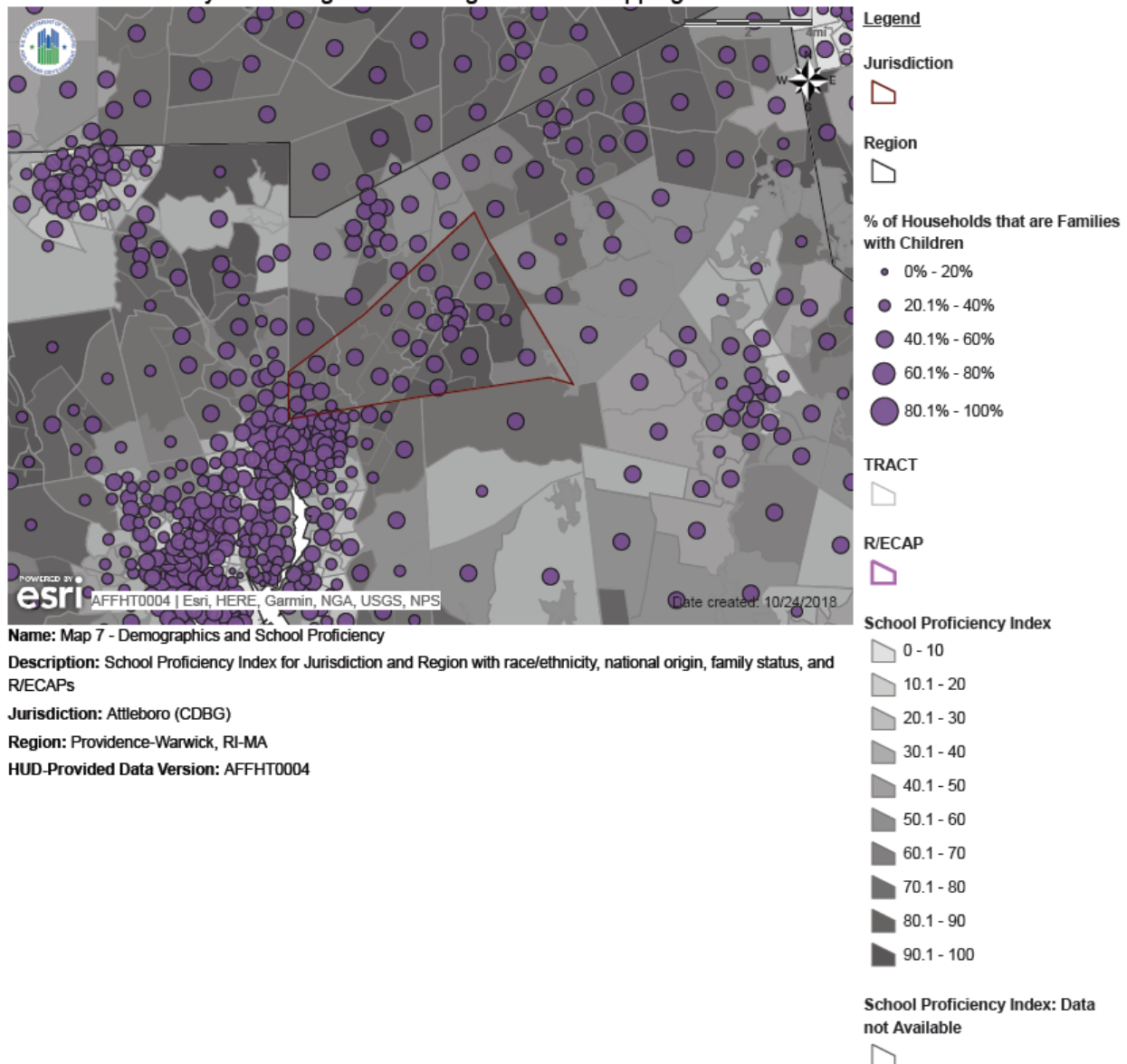
Map 6: School Proficiency by Race/Ethnicity, Attleboro, MA
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 7: School Proficiency by National Origin, Attleboro, MA HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 8: School Proficiency by Family Status, Attleboro, MA
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Within the Consortium, areas that are further west tend to have more proficient schools whereas those to the east and in the center of the city of Taunton tend to have less proficient schools. The western portion of the Consortium is more heavily Asian and Pacific Islander than the remainder of the Consortium, and, although Taunton is more heavily Black and Hispanic than the Consortium as a whole, the eastern portion of the Consortium, including Middleborough is more heavily non-Hispanic White. Within the cities of Taunton and Attleboro, because there is minimal concentration of residents on the basis of race and ethnicity, there is no apparent relationship between where residents live within those cities, race and ethnicity, and school proficiency. In both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, by contrast, those factors are closely connected. Comparatively heavily Black and Hispanic cities like Providence, Pawtucket, New Bedford, and Brockton have less proficient schools, and many predominantly non-Hispanic White suburbs have highly proficient schools. There are some

predominantly non-Hispanic White areas, like the city of Fall River, that cut against this trend and have low school proficiency.

With respect to national origin, within the Consortium, people of Indian and Canadian national origin are concentrated in areas like Attleboro in the western portion of the Consortium where school proficiency is high. People of Azorean national origin are concentrated in Taunton where school proficiency is relatively low, and people of Brazilian national origin are concentrated in Middleborough where school proficiency is relatively low. There are concentrations of people of Portuguese national origin in areas with high school proficiency, such as Attleboro, but the most intense concentrations of Portuguese-Americans are in Taunton where school proficiency is relatively low. There does not appear to be a relationship between national origin, school proficiency, and neighborhood within the city of Taunton. In Attleboro, although school proficiency is high citywide, individuals of Canadian national origin tend to reside in areas with especially high school proficiency. Within the custom region, people of Haitian and Cape Verdean national origin are concentrated in Brockton and Randolph where school proficiency is low, people of Chinese national origin are concentrated in Quincy which has areas of both moderate and high school proficiency, people of Portuguese national origin are concentrated in Fall River and New Bedford where school proficiency is low, and there is also a concentration of people of Cape Verdean national origin in New Bedford. Within the Providence-Warwick, RI-MA Metropolitan Statistical Area, there are also concentrations of persons of Guatemalan and Dominican national origin in southwestern Providence; concentrations of Guatemalan, Dominican, and Cape Verdean national origin in Pawtucket; and concentrations of persons of Portuguese and Azorean national origin in East Providence. All of these areas have low school proficiency though access to proficient schools is somewhat higher in East Providence than it is in Pawtucket and southwestern Providence.

Within the Consortium, families with children are more likely to live in more highly suburbanized places, like Attleboro, that have high school proficiency as opposed to in more urbanized areas like Taunton with less proficient schools. In the cities of Taunton and Attleboro, there are not significant neighborhood-based disparities in access to proficient schools by familial status. In both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, the pattern mirrors that of the Consortium: families with children, which comprise a higher share of all households in suburban areas, tend to have disproportionately high access to proficient schools.

- 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.*

Public schools in Massachusetts are funded with a mix of a foundation budget that reflects the State's assessment of relative local need for additional support and local property tax revenues. Although the foundation budget is designed to result in relatively equal levels of overall funding between affluent school districts and socioeconomically diverse ones, in practice, many affluent communities have been willing to raise more property tax revenue for their schools than the State's formula anticipated. This gap contributes to inequity between school districts in

socioeconomically diverse cities like Taunton, New Bedford, and Brockton and nearby suburbs. Although student assignment policies that do not allow for easy access to inter-district transfers contribute to disparities in access to school proficiency within the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, they do not appear to be significant drivers of educational inequality in the Consortium and the cities of Taunton and Attleboro. The one exception to this may be that inter-district transfers might increase access to proficient schools for individuals of Portuguese and Azorean national origin living within the city of Taunton.

School districts within the Consortium are not perfectly co-extensive with the Consortium's 14 municipalities and may include areas, such as the town of Rehoboth, that are outside of the Consortium. Supplementary school proficiency data for those districts is presented in the table below.

**Massachusetts Composite Performance Index Data for School Districts That Include
Grades 9-12¹¹⁷**

School District	% Non-Hispanic White	Composite Performance Index English Language Arts – Grade 10	Composite Performance Index Mathematics – Grade 10	Composite Performance Index – All Grades
Attleboro	68.8%	95.9	90.4	80.5
Bridgewater-Raynham	89.2%	98.6	94.4	82.5
Bristol County Agricultural	92.1%	98.7	94.6	95.7
Bristol-Plymouth Regional Vocational Technical	85.5%	97.6	91.0	88.9
Carver	95.8%	99.0	95.8	73.6
Dighton-Rehoboth	89.8%	97.7	91.0	82.1
Freetown-Lakeville	94.1%	99.0	96.4	83.3
Mansfield	82.6%	98.8	97.1	85.1
Middleborough	88.4%	98.0	88.7	77.4
North Attleboro	81.5%	98.6	94.8	87.3
Norton	88.8%	99.3	94.7	82.4
Seekonk	88.1%	98.5	93.5	85.1
Somerset Berkley Regional	92.8%	97.5	93.9	87.7
Taunton	66.1%	92.8	83.7	67.9

¹¹⁷ Assessment data is for the 2016-2017 school year. Demographic data is for the 2017-2018 school year.

This data capturing a different and later point in time than HUD's School Proficiency Index, which relies upon fourth grade test scores, tells a somewhat different story with respect to disparities in access to opportunity. Although Taunton and Middleborough remain areas with comparatively low performing schools, there is a clear gap between those two school districts with the more racially and ethnically diverse Taunton having less proficient schools than the more heavily non-Hispanic White Middleborough. This suggests that there may be modest but significant disparities in access to proficient schools within the Consortium rather than solely at the regional level.

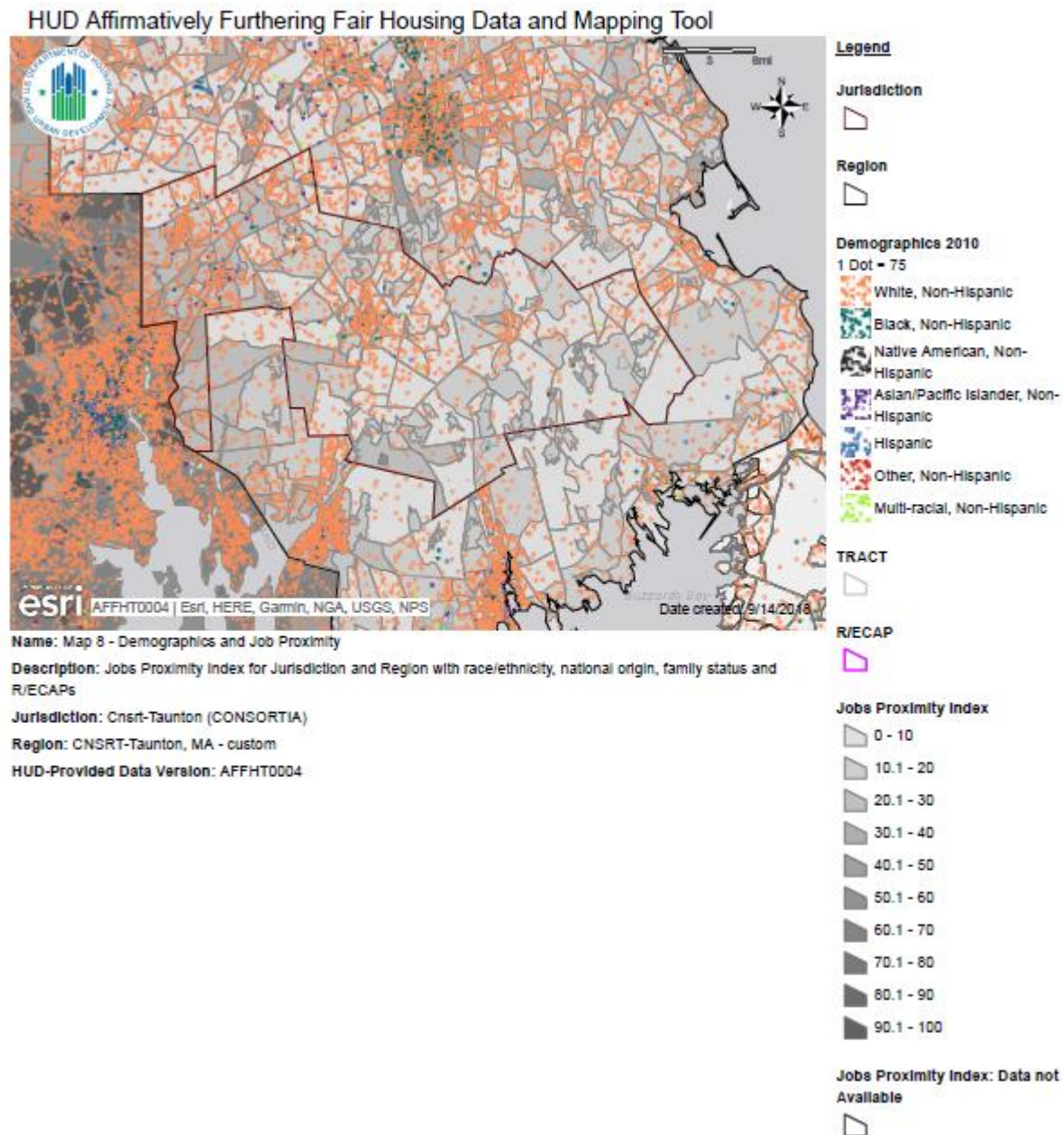
b. Employment

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

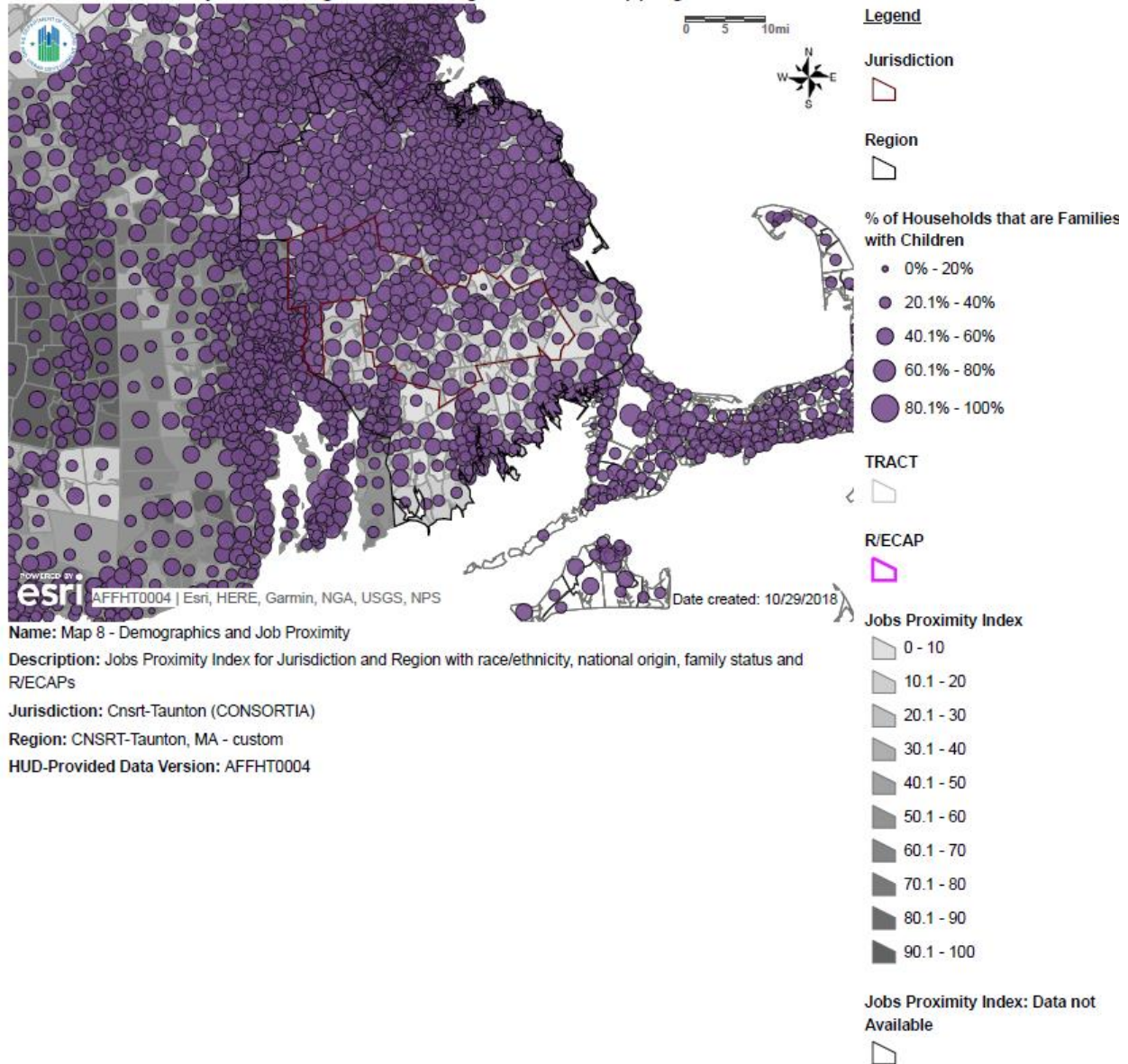
In the Consortium, White residents and Asian and Pacific Islander residents have greater access to neighborhoods with higher labor market participation than do Black and Hispanic households. With respect to proximity to job centers, there are no significant differences in access by race or ethnicity, but job proximity is very low in the Consortium across all groups. In the City of Taunton, the same patterns persist, but overall levels of both labor market engagement and job proximity are lower across the board for all groups. This suggests that the presence of job opportunities in Taunton's urban core and in its industrial parks does not offset its greater difference from jobs in Providence and Greater Boston relative to some other communities within the Consortium. In the City of Attleboro, White residents have the greatest access to neighborhoods with high labor market engagement. Black and Asian and Pacific Islander residents have similar levels of access to each other and somewhat less access than White residents. Hispanic residents have the lowest levels of access. As with the Consortium and the City of Taunton, there are no significant disparities with respect to job proximity, which is generally significantly higher than in the Consortium while still being low in comparison to the Providence-Warwick, RI-MA Metropolitan Statistical Area.

In the custom region, Asian and Pacific Islander residents, followed closely by White residents, have the greatest access to neighborhoods with high labor market engagement. Black and Hispanic residents have far lower levels of access, and the disparity in access is much greater than within the Consortium itself. With respect to job proximity, there are no significant disparities, and overall job proximity within the custom region is only marginally greater than it is within the Consortium. In the Providence-Warwick, RI-MA Metropolitan Statistical Area, the data paints a slightly different story. First, although White and Asian and Pacific Islander residents continue to have greater access to neighborhoods with labor market engagement than other groups, their order is flipped, and White residents have more access than Asian and Pacific Islander residents. Second, there are significant disparities in job proximity with Black, Hispanic, and Asian and Pacific Islander residents have much higher job proximity than more heavily suburbanized White residents. Additionally, overall job proximity in the Providence-Warwick, RI-MA Metropolitan Statistical Area is much higher than in the custom region.

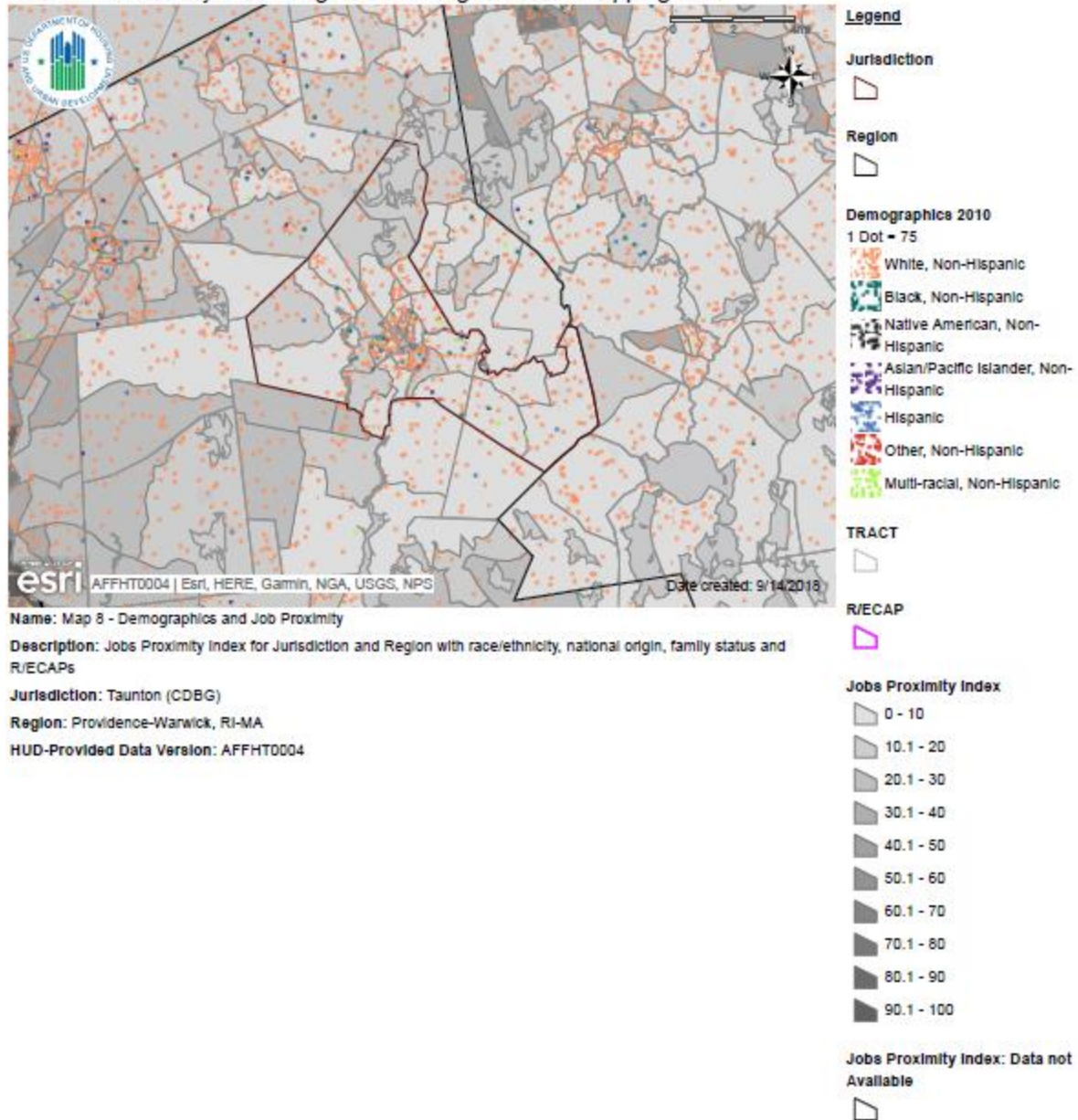
- ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.



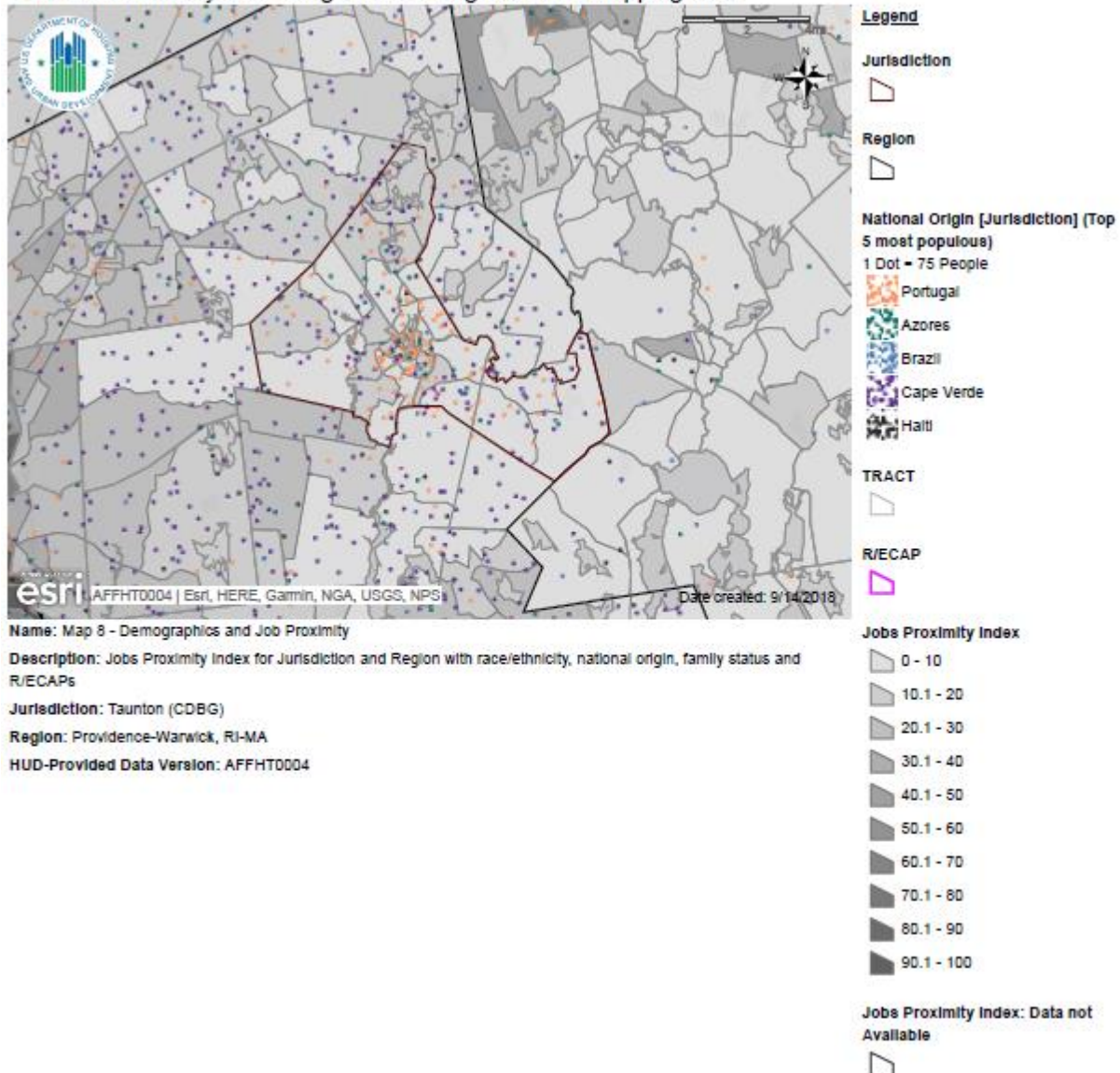
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



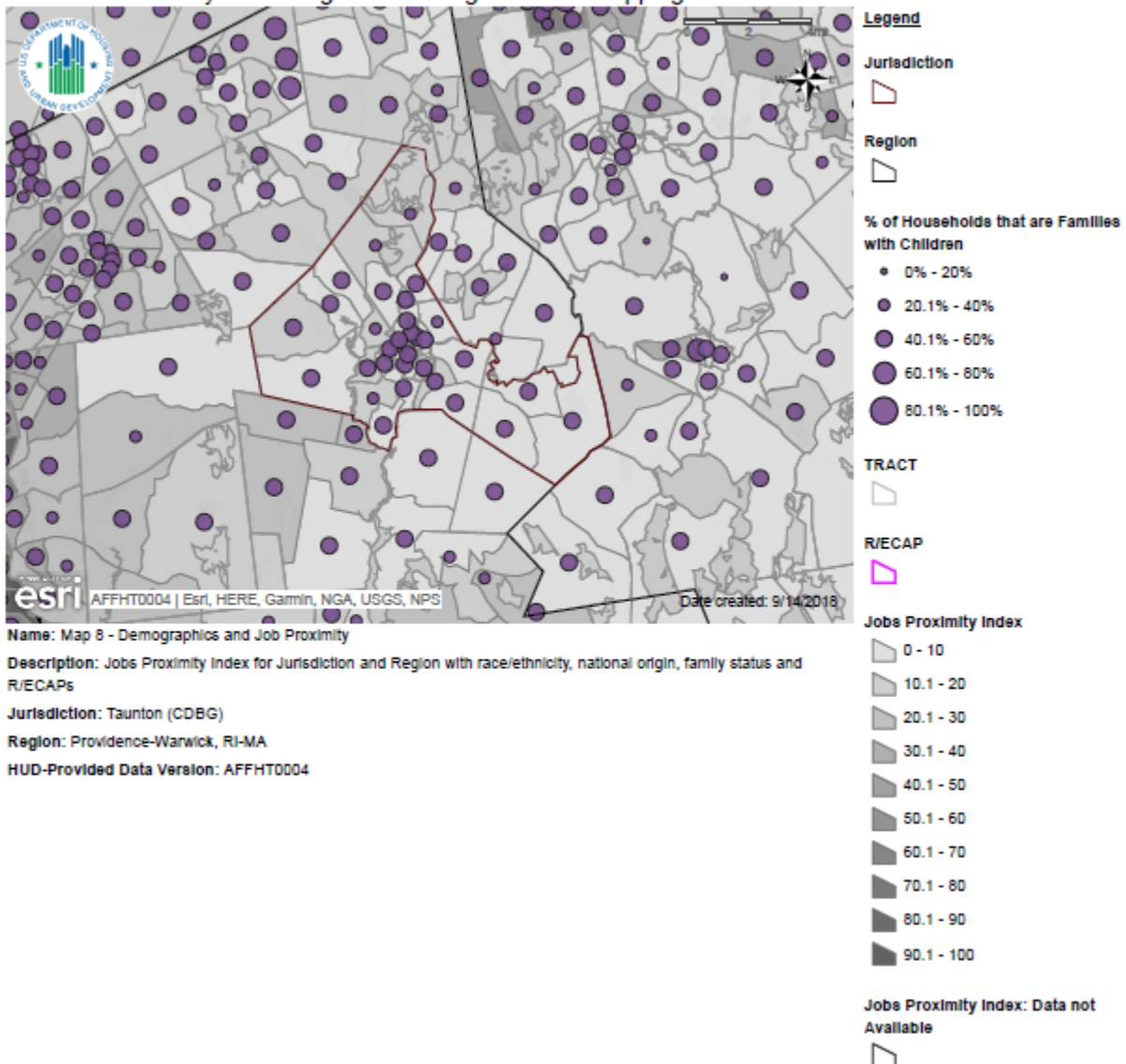
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



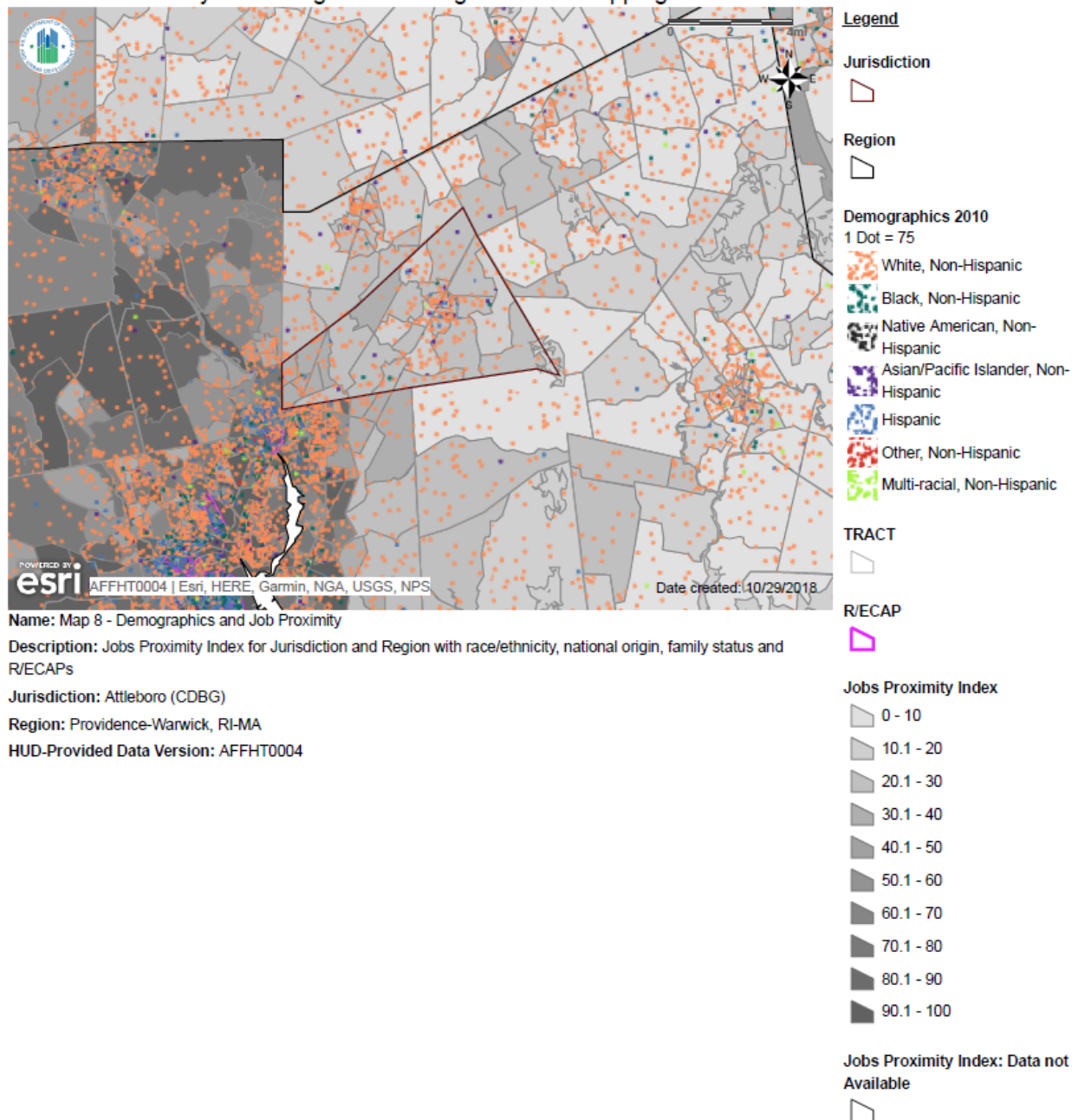
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



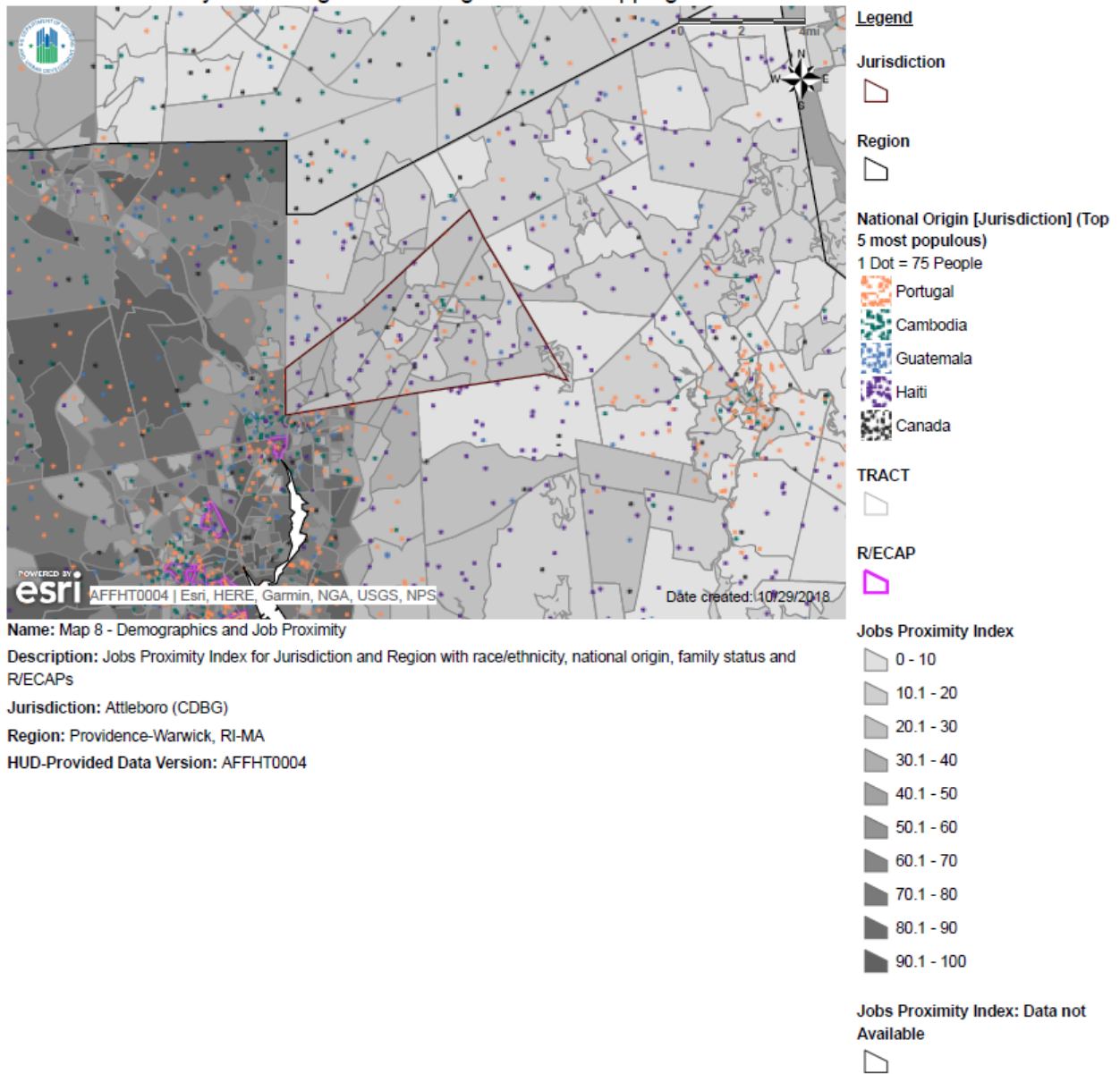
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



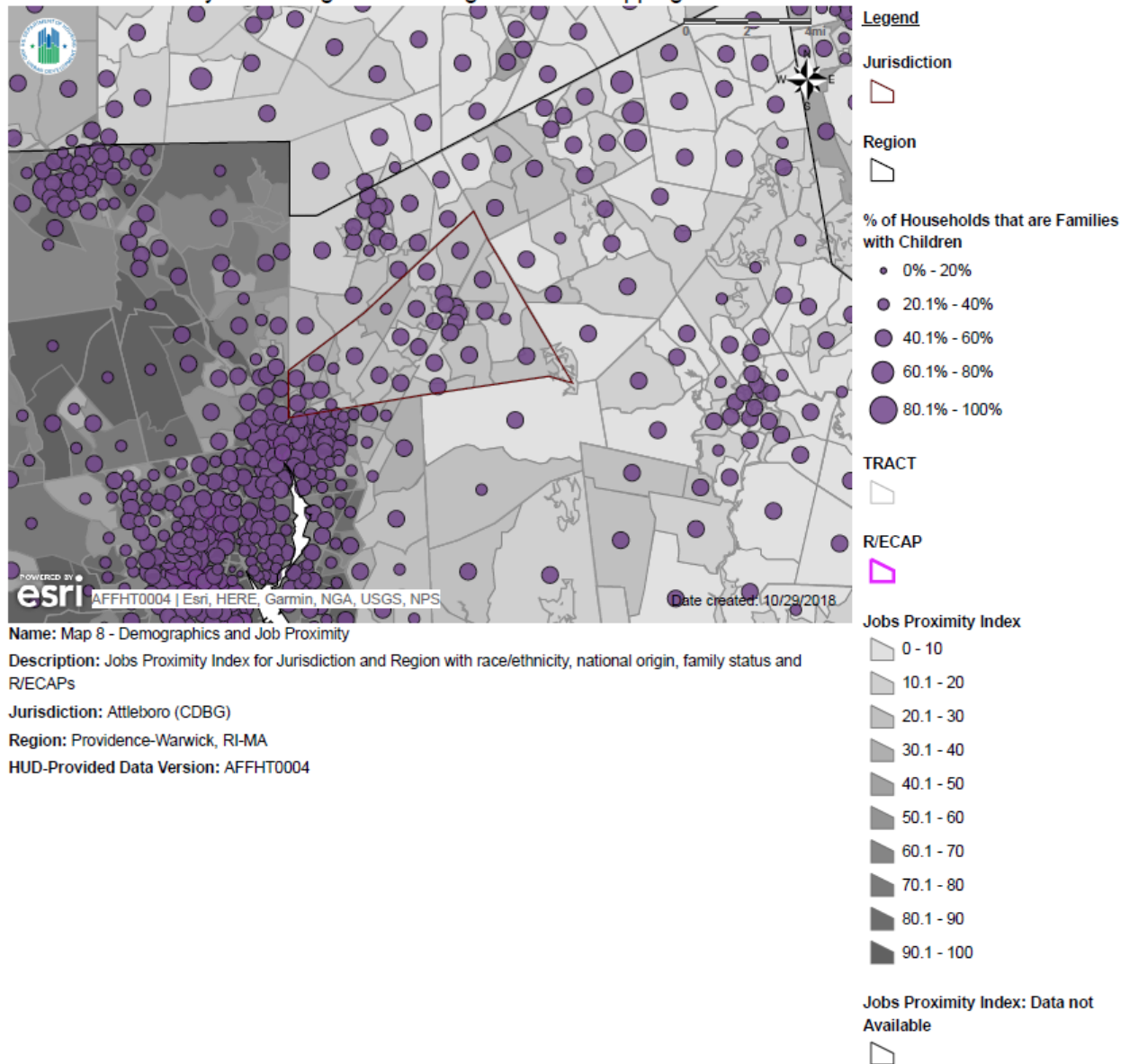
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



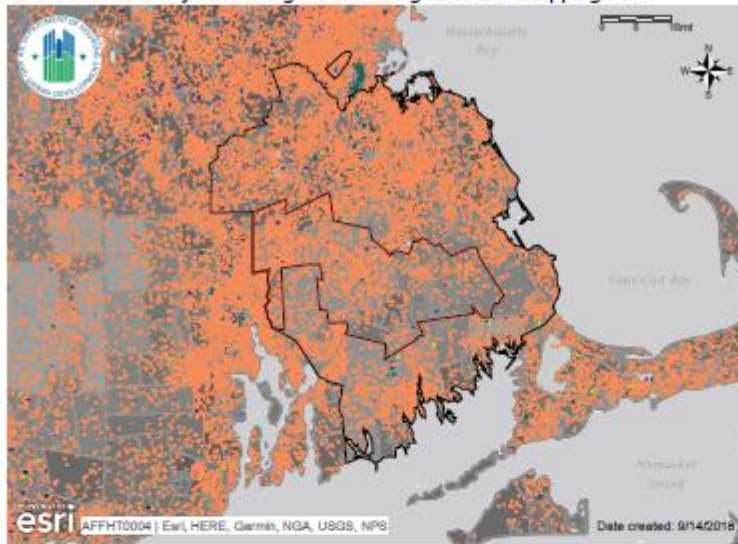
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



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: Cnsrt-Taunton (CONSORTIA)

Region: Cnsrt-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Legend

Jurisdiction



Region



Demographics 2010

1 Dot = 75

White, Non-Hispanic



Black, Non-Hispanic



Native American, Non-



Hispanic

Asian/Pacific Islander, Non-



Hispanic

Other, Non-Hispanic



Multi-racial, Non-Hispanic



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



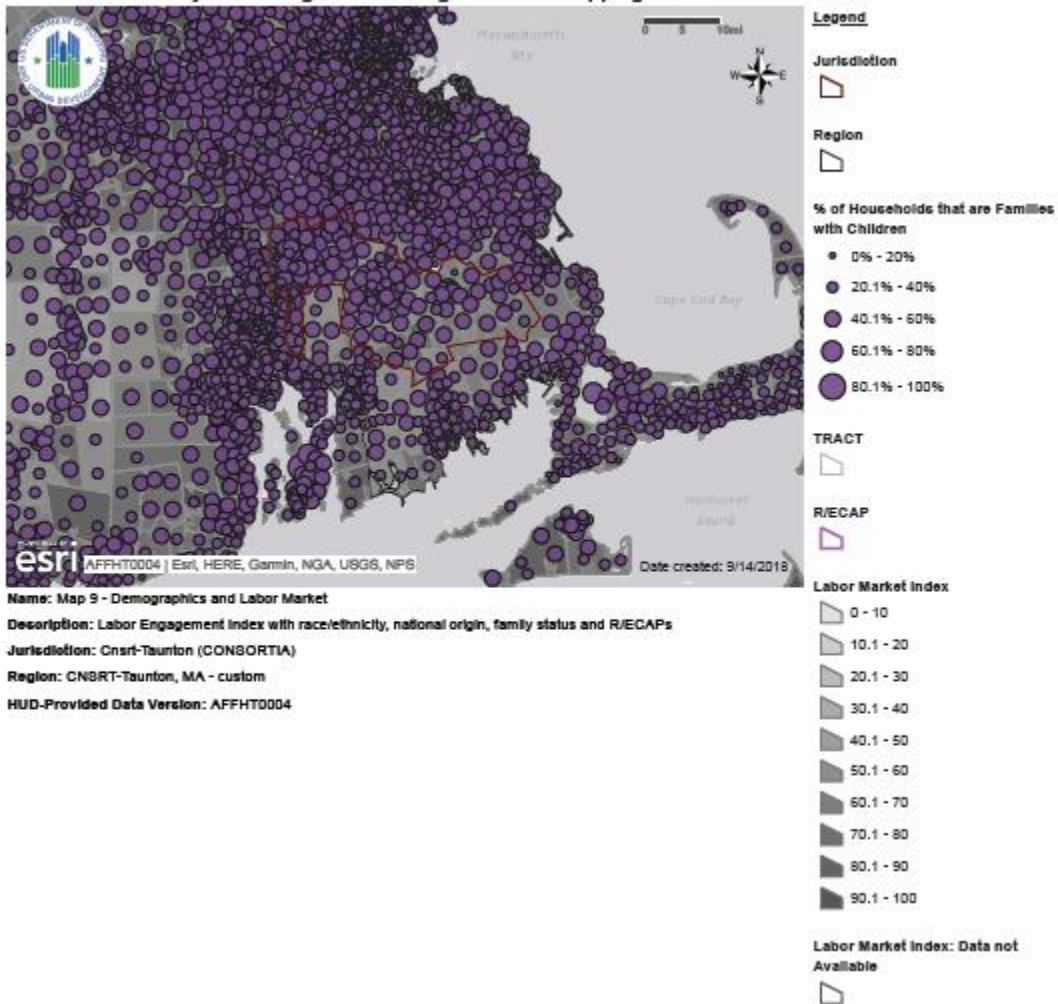
90.1 - 100



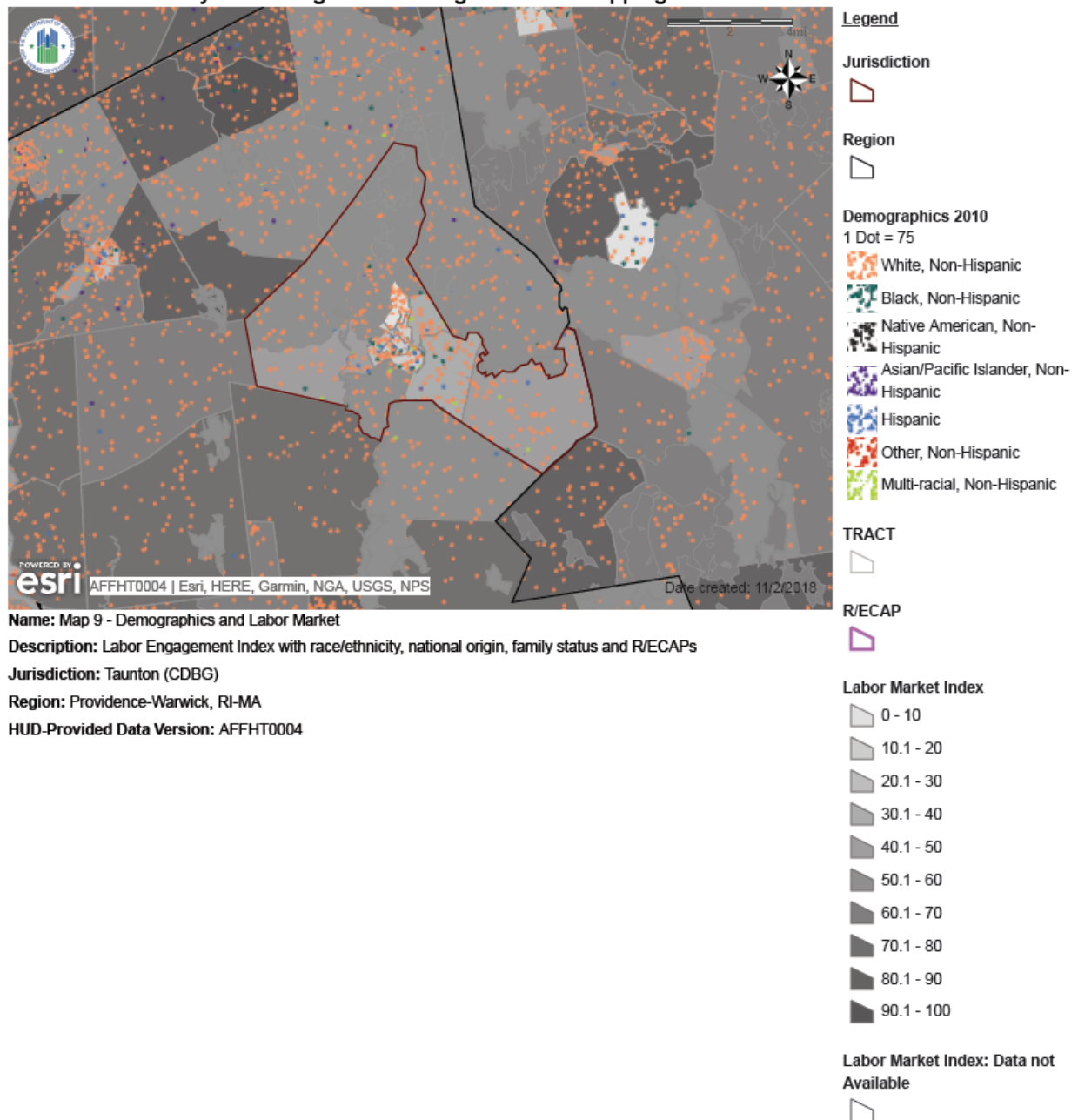
Labor Market Index: Data not Available



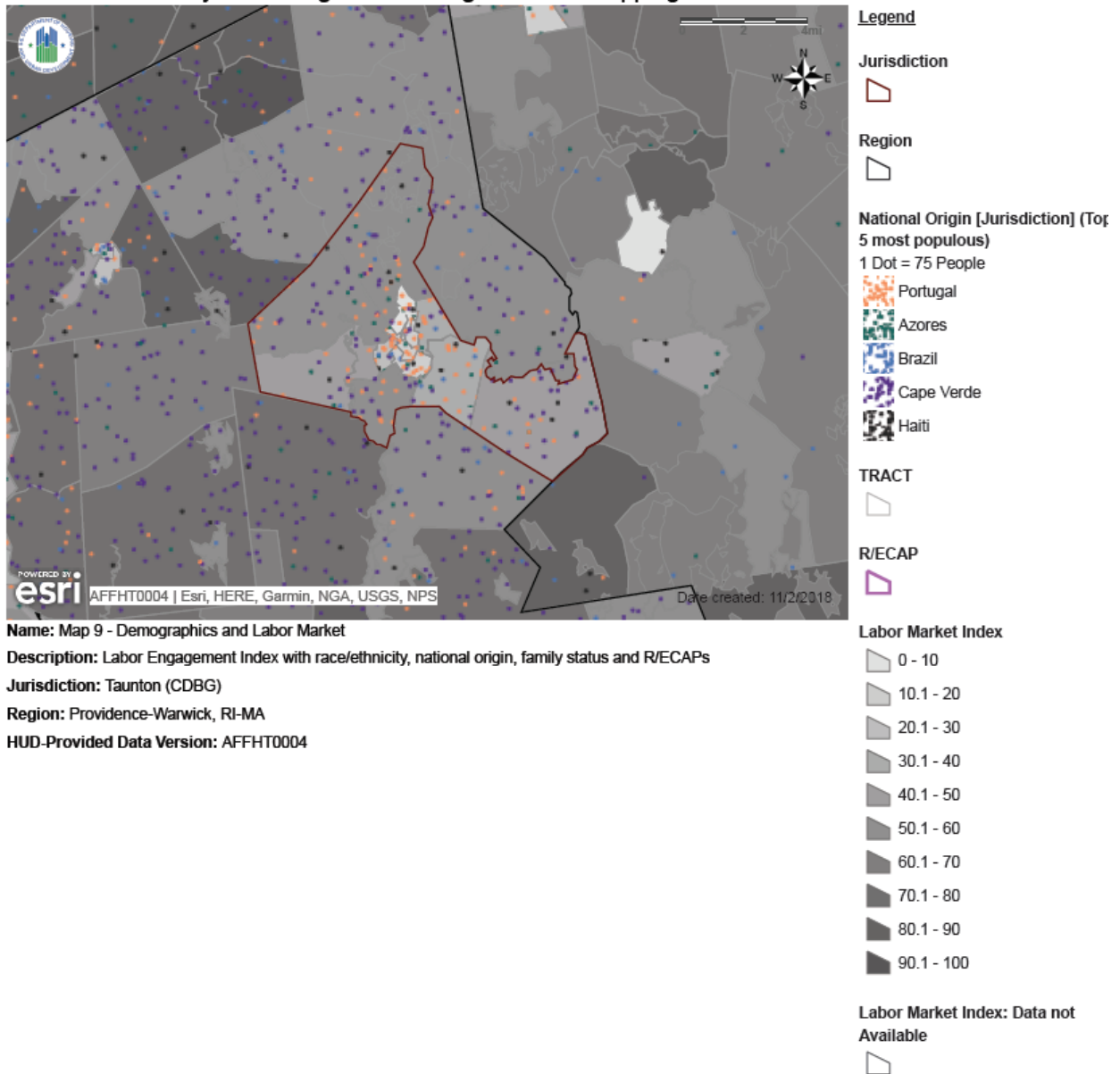
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



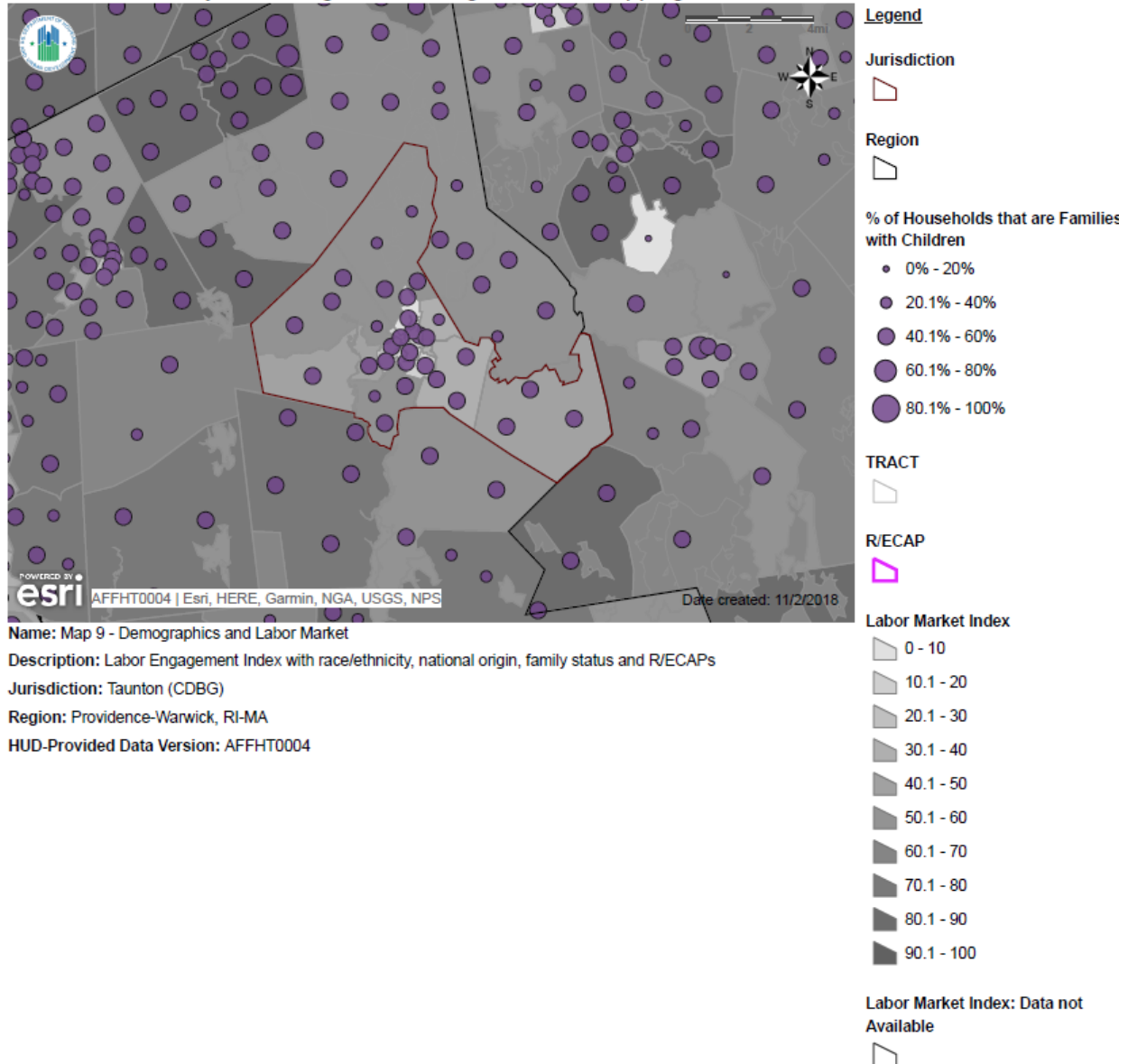
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



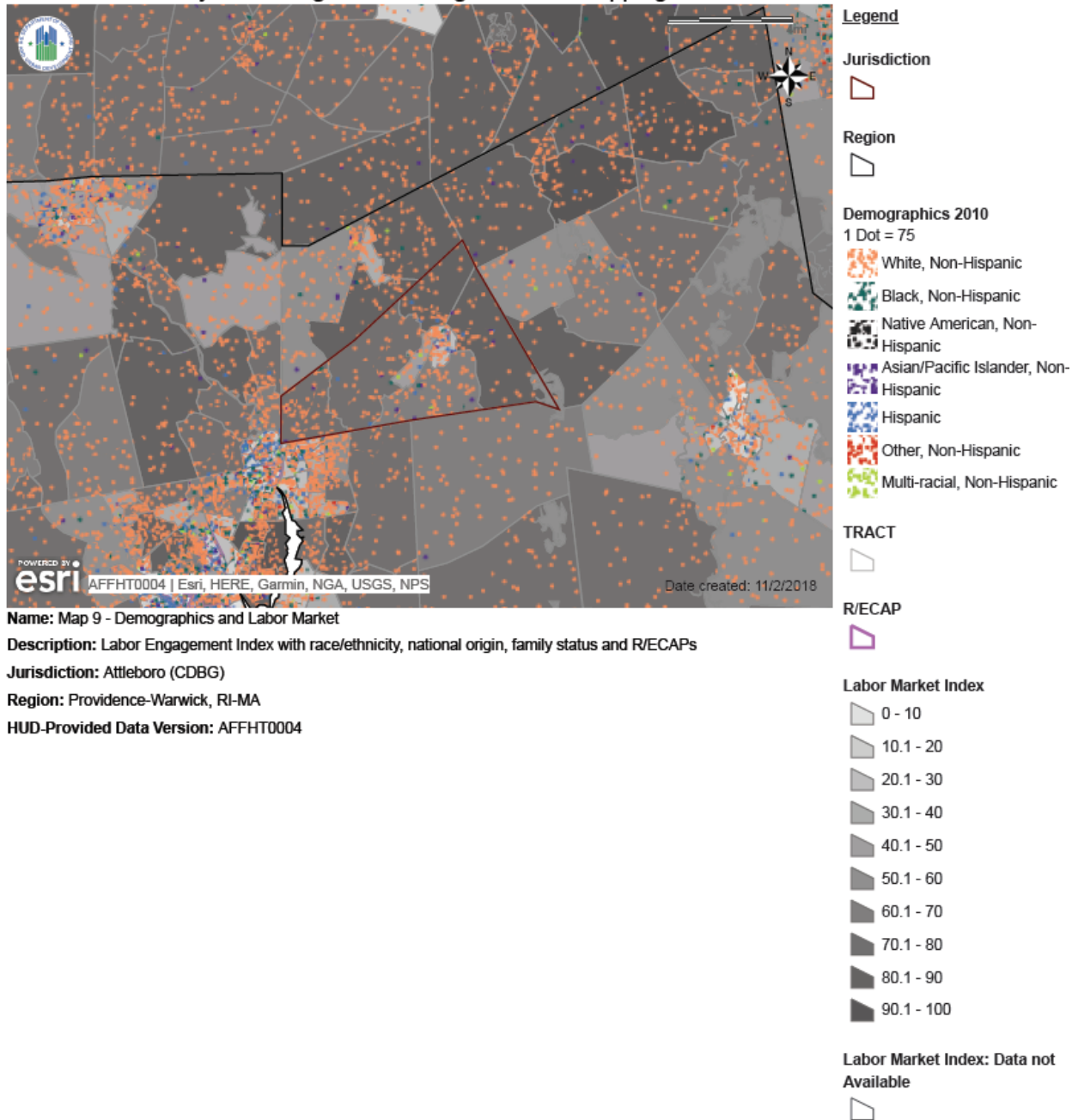
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



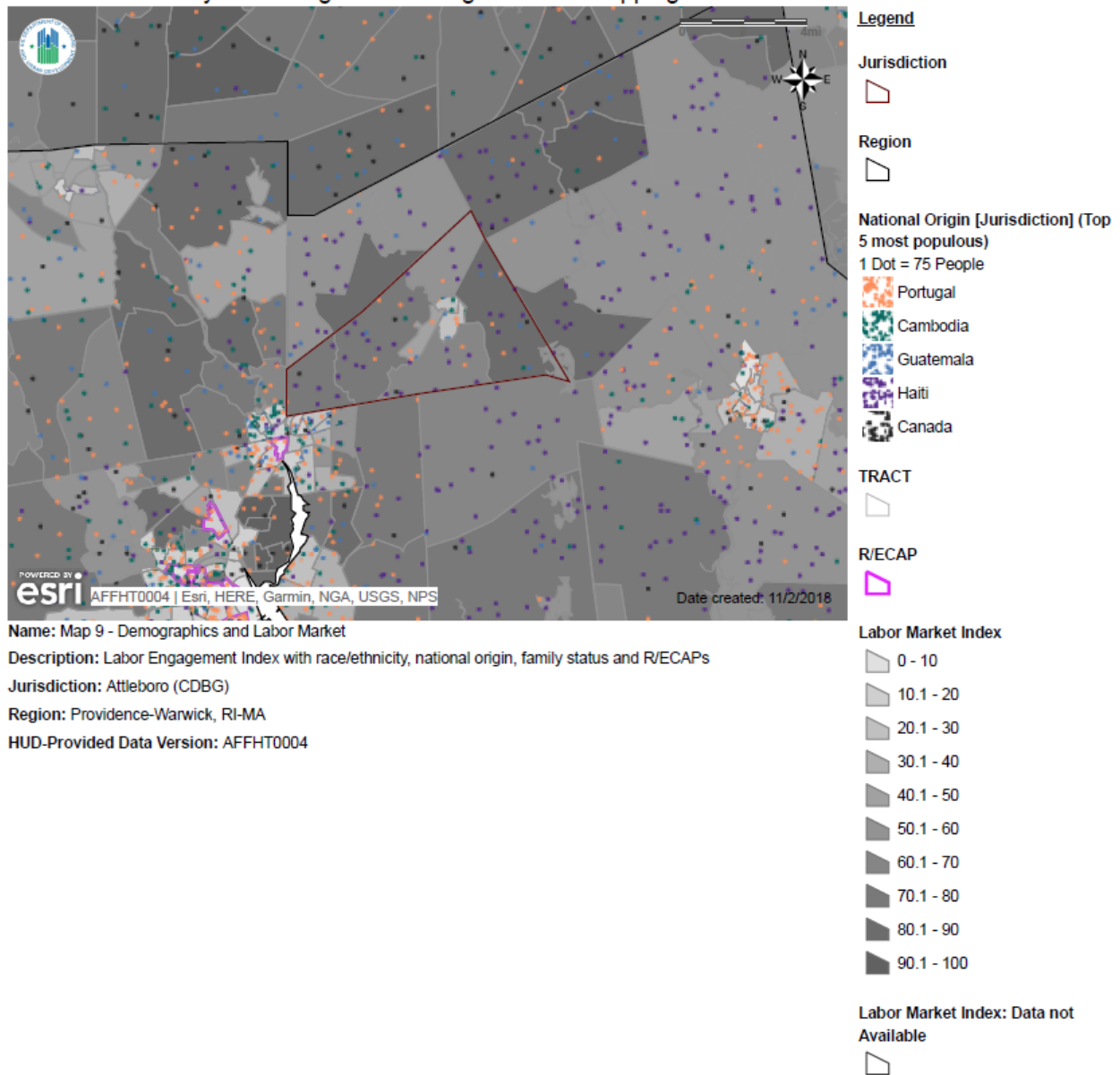
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



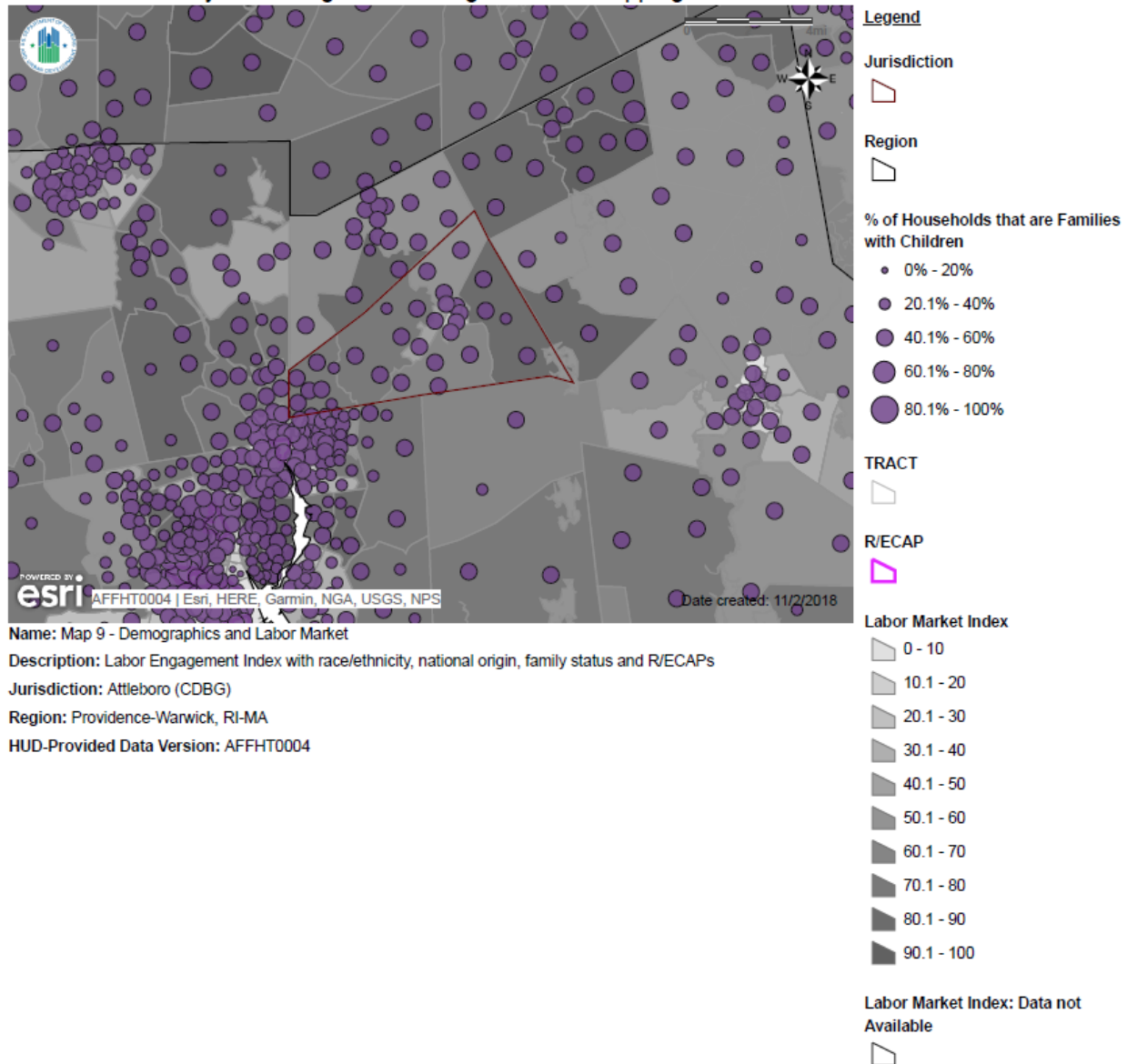
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Within the Consortium, job proximity is generally highest in communities to the west of Consortium such as Attleboro and Seekonk and is lowest in the more rural eastern portion of the Consortium. With respect to labor market engagement, some additional communities, such as Norton in the northern portion of the Consortium and the western portion of Lakeville, also rate highly, while the City of Taunton, in the central portion of the Consortium, has lower levels of labor market engagement. Consistent with the data discussed above, there does not appear to be a clear relationship between areas with high job proximity and demographic composition, as some of the areas with both the highest and the lowest job proximity are predominantly White. With regard to labor market engagement, by contrast, areas with higher Black, Hispanic, Portuguese, and Azorean population concentration do appear to have less access to areas with high labor market engagement. This largely stems from the lower levels of labor market engagement in the City of Taunton. There does not appear to be a relationship between familial status and either job proximity or labor market engagement.

In the City of Taunton, labor market engagement is lowest in the central portion of the city, which is slightly more heavily Brazilian and Hispanic than the city as a whole. Labor market engagement is highest in the northern portion of the city, which is the city's most heavily White area. There are relatively few families with children in that area, but, throughout the rest of the city (including both areas with low and more moderate labor market engagement), families with children are evenly distributed. Job proximity in Taunton is highest in the central and northern portions of the city, areas that have fairly divergent demographic compositions from each other. Thus, job proximity does not appear to be significantly related to racial and ethnic composition. By contrast, the areas of the city with relatively low job proximity are among the parts of the city with higher concentrations of families with children.

In the City of Attleboro, labor market engagement is lowest in the center of the city, which is much more heavily Hispanic than the city as a whole. Job proximity is highest in two distinct areas. The first is the far western portion of the city. The other is the area southwest of the interchange of Interstates 95 and 295. These areas are predominantly White though the western portion of the city has a small concentration of individuals of Haitian national origin. The far western portion of the city has a significant concentration of families with children though the area near the highway interchange does not.

In the custom region, the areas outside of the Consortium with the highest labor market engagement include Mattapoisett, Marshfield, Hingham, Braintree, Milton, Franklin, Needham, and Dover. These are all areas in which the population is predominantly non-Hispanic White though Needham also has a substantial Asian and Pacific Islander population. These areas do not have significant concentrations of members of the most populous national origin groups in the custom region. These predominantly suburban areas tend to have higher concentrations of families with children than the custom region as a whole. Job proximity is generally low throughout the custom region with areas near Boston like Needham, Dover, Milton, Dedham, and Quincy as well as the smaller urban center of Brockton having comparatively high job proximity. Brockton has high concentrations of Black, Hispanic, and Haitian residents while the other areas are predominantly non-Hispanic White. Parts of Milton have relatively high Black populations, being located adjacent to heavily Black parts of Boston. These areas generally have small concentrations of the largest national origin groups though Quincy has a significant population of Chinese-American residents and Brockton has a large Haitian-American population. Families with children have high levels of access to places with high job proximity.

In the Providence-Warwick, RI-MA Metropolitan Statistical Area, the areas outside of the Consortium with the highest labor market engagement include South Kingstown, North Kingstown, East Greenwich, the eastern part of Warwick, Barrington, the east side of the City of Providence, and Cumberland, all within Rhode Island. These areas are all predominantly non-Hispanic White though the east side of the City of Providence has a significant Asian and Pacific Islander population. Areas with high labor market engagement generally have low populations of the largest national origin groups in the Providence-Warwick, RI-MA Metropolitan Statistical Area. These places, with the exception of the east side of the City of Providence, tend to have high concentrations of families with children. The areas with the lowest labor market engagement are heavily Black and Hispanic parts of the west side of the City of Providence and the City of Pawtucket. These areas have high concentrations of individuals of Guatemalan, Dominican, Cape Verdean national origin and low concentrations of families with children. Job

proximity in the Providence-Warwick, RI-MA Metropolitan Statistical Area tends to be highest in the Cities of Providence, East Providence, Warwick, and Pawtucket as well as the Town of Lincoln. These areas include both urban centers that are heavily Black and Hispanic, with large numbers of members of populous national origin groups and low concentrations of families with children, as well as suburban areas with the opposite characteristics. The parts of Massachusetts within the Providence-Warwick, RI-MA Metropolitan Statistical Area generally have far lower job proximity than those within Rhode Island.

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

The HUD-provided data analyzed above measures the interplay between where people live by race and ethnicity and access to employment, but it does not directly measure disparities in employment status. The table below, though based on lagging American Community Survey data, provides some insight into that topic.

Unemployment by Race and Ethnicity, 2012-2016 American Community Survey

	Providence-Warwick, RI-MA Metropolitan Statistical Area	Taunton, MA	Attleboro MA
White, Not Hispanic	7.0%	6.7%	7.0%
Black	11.7%	11.9%	9.8%
Asian	5.9%	0.0%	9.7%
Hispanic	12.8%	20.7%	12.4%

Labor Force Participation by Race and Ethnicity, 2012-2016 American Community Survey

	Providence-Warwick, RI-MA Metropolitan Statistical Area	Taunton, MA	Attleboro MA
White, Not Hispanic	65.3%	66.1%	70.6%
Black	67.8%	76.2%	83.5%
Asian	65.2%	66.4%	74.0%
Hispanic	66.3%	56.9%	68.6%

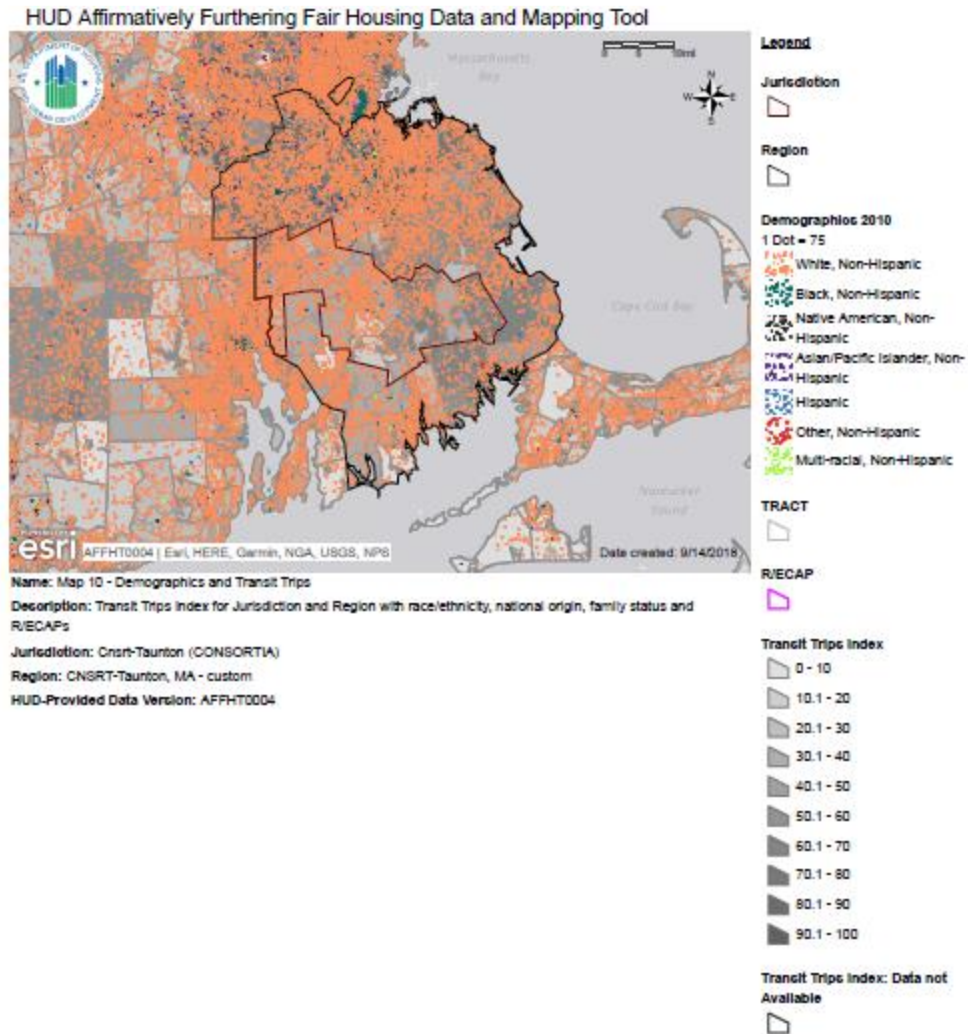
This data reveals significant disparities in unemployment by race and ethnicity in the Cities of Taunton and Attleboro as well as in the Providence-Warwick, RI-MA Metropolitan Statistical Area. There are not similar disparities in labor force participation, perhaps because the fact that a higher percentage of the non-Hispanic White population is elderly offsets disproportionate barriers to employment opportunity.

Overall Unemployment Rate, Seasonally Adjusted, August 2018, Bureau of Labor Statistics

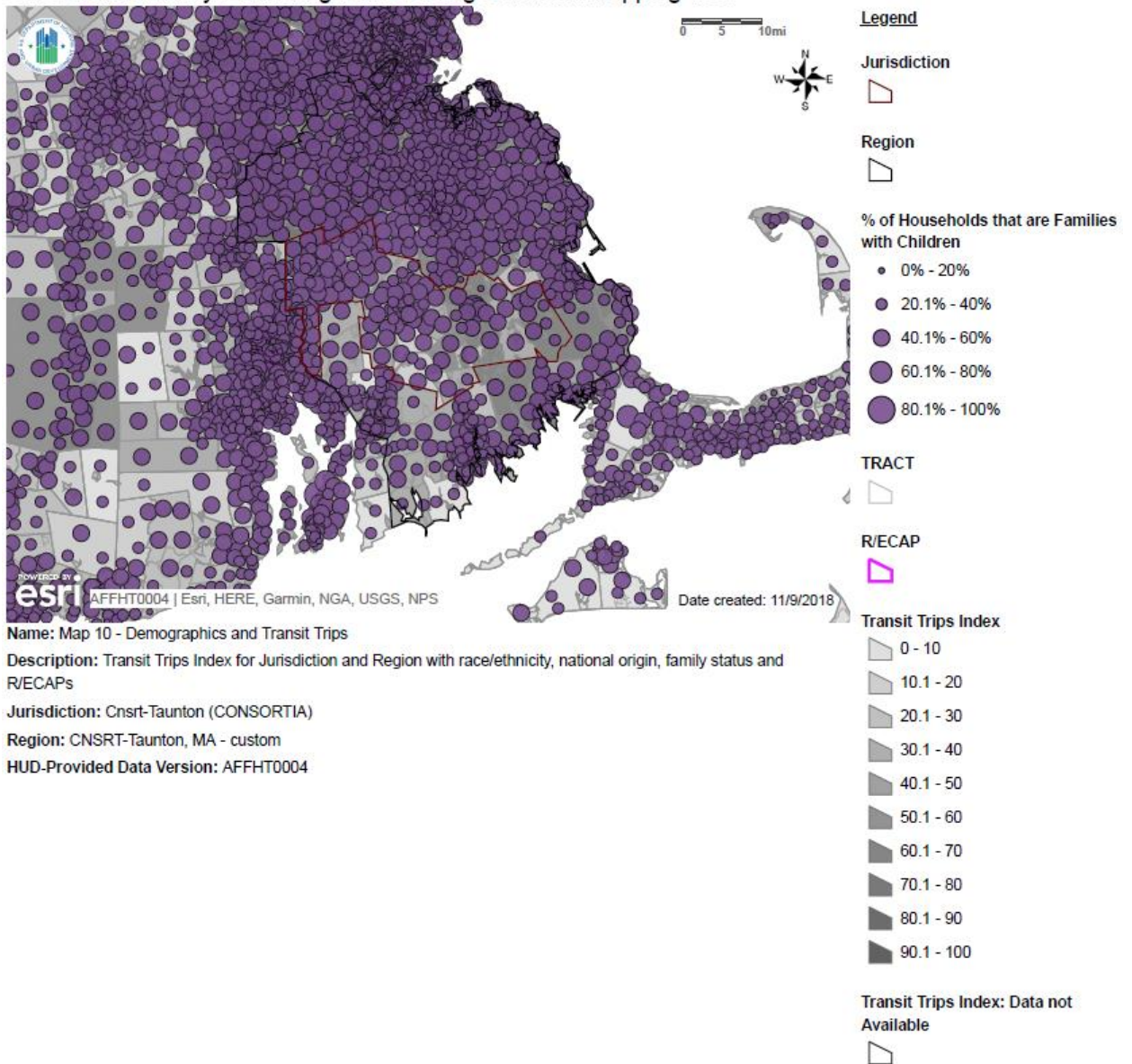
Geographic Area	Unemployment Rate
Taunton	4.3%
Attleboro	3.8%
North Attleboro	3.7%
Taunton-Middleborough-Norton, MA NECTA Division	4.0%
Providence-Warwick, RI-MA Metropolitan Statistical Area	3.9%

As the table above indicates, five-year American Community Survey data provides a snapshot of what employment conditions in the Consortium and the Providence-Warwick, RI-MA Metropolitan Statistical Area were like in roughly 2014. The job market has continued its recovery from the lingering effects of the Great Recession since that time, and overall unemployment is now much lower throughout the area. The relative disparities captured in the American Community Survey likely persist, but overall unemployment for Black and Hispanic workers is likely lower now than it was in 2014.

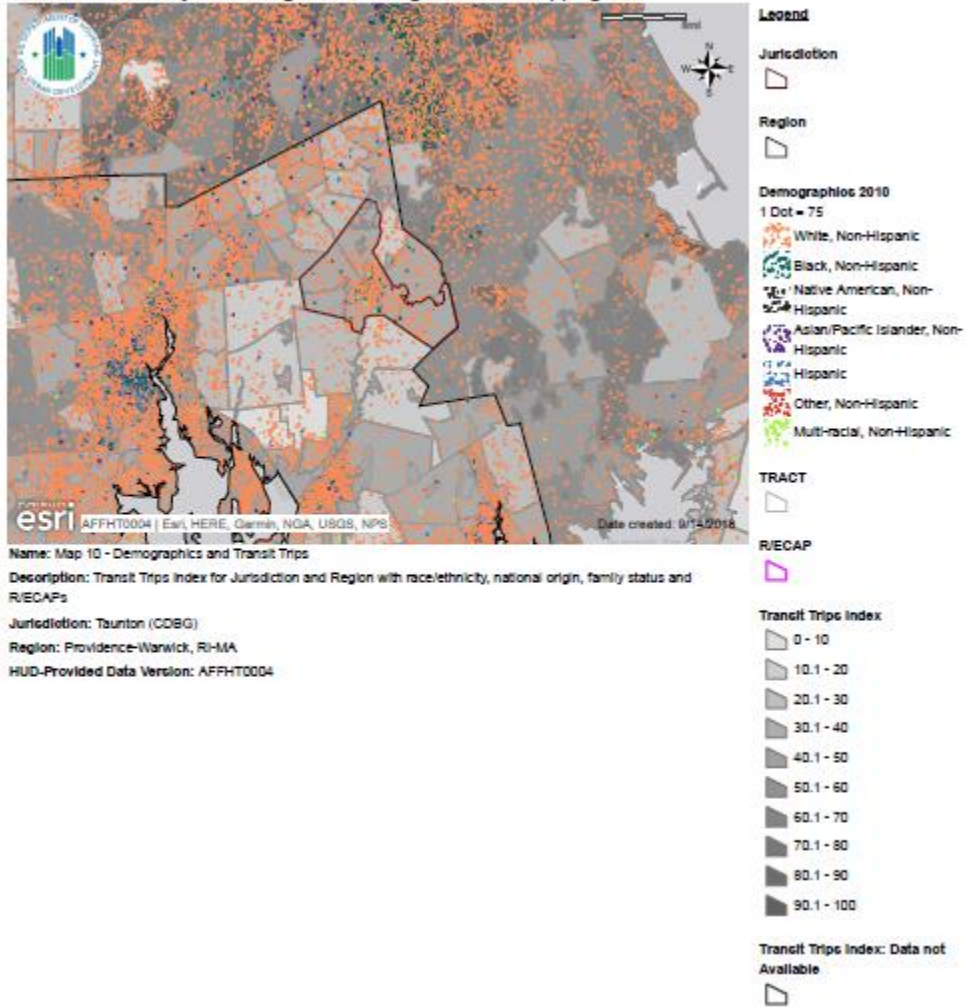
c. Transportation



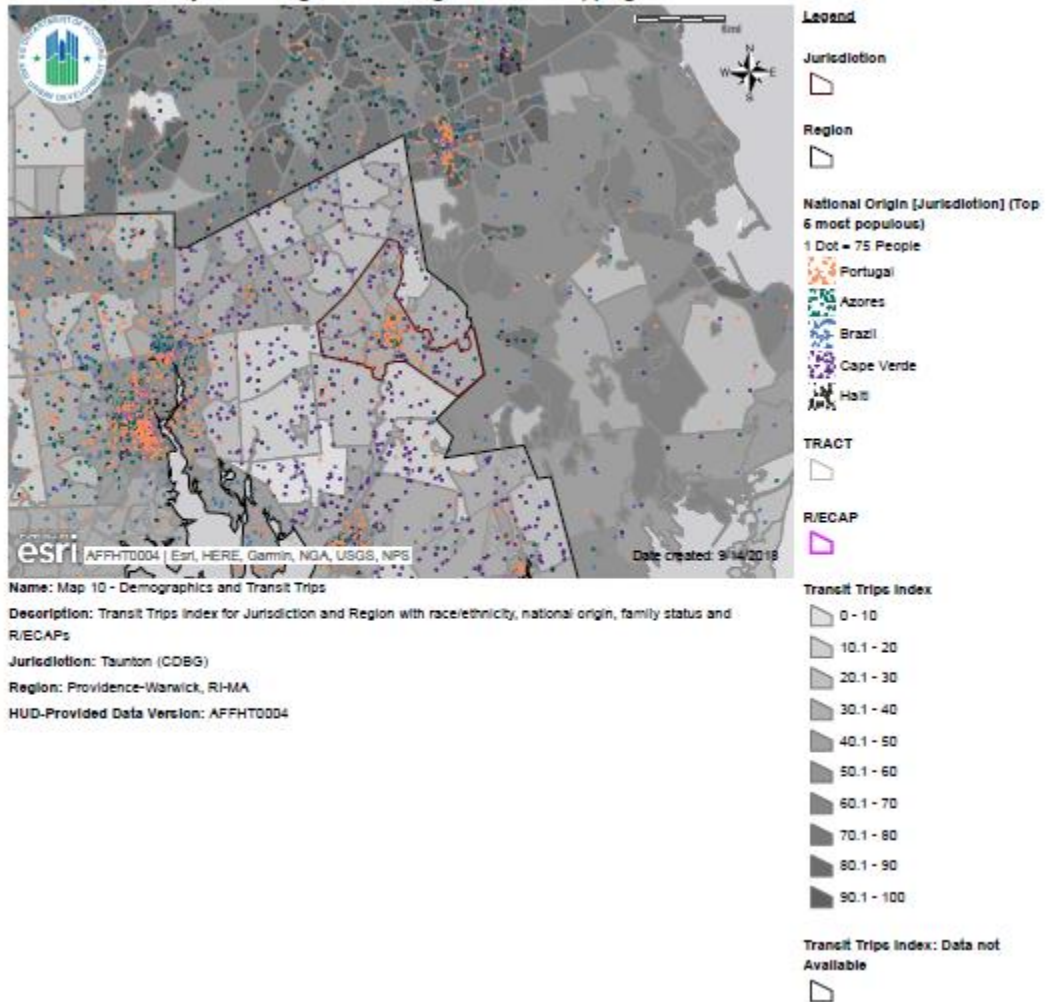
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



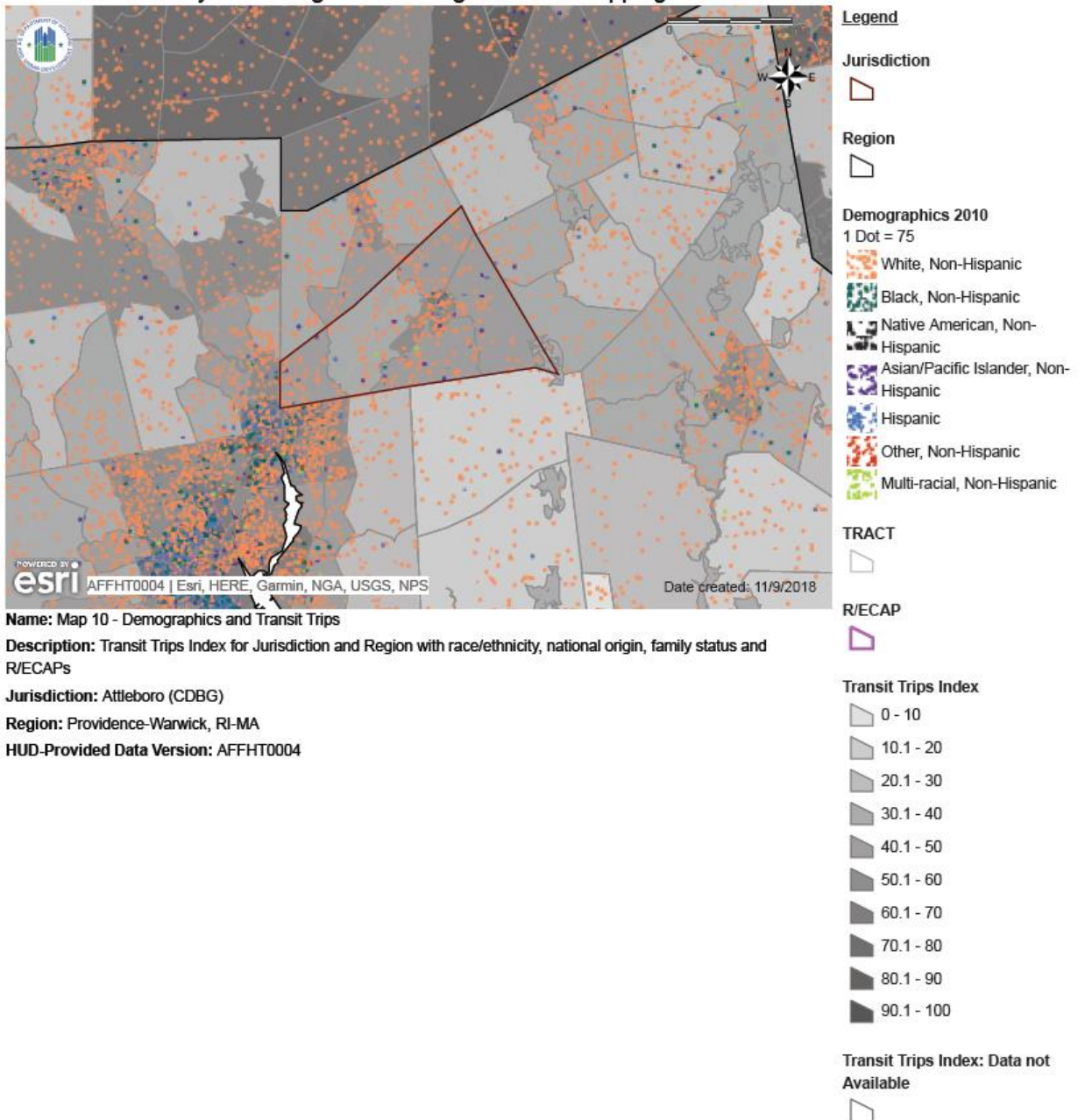
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



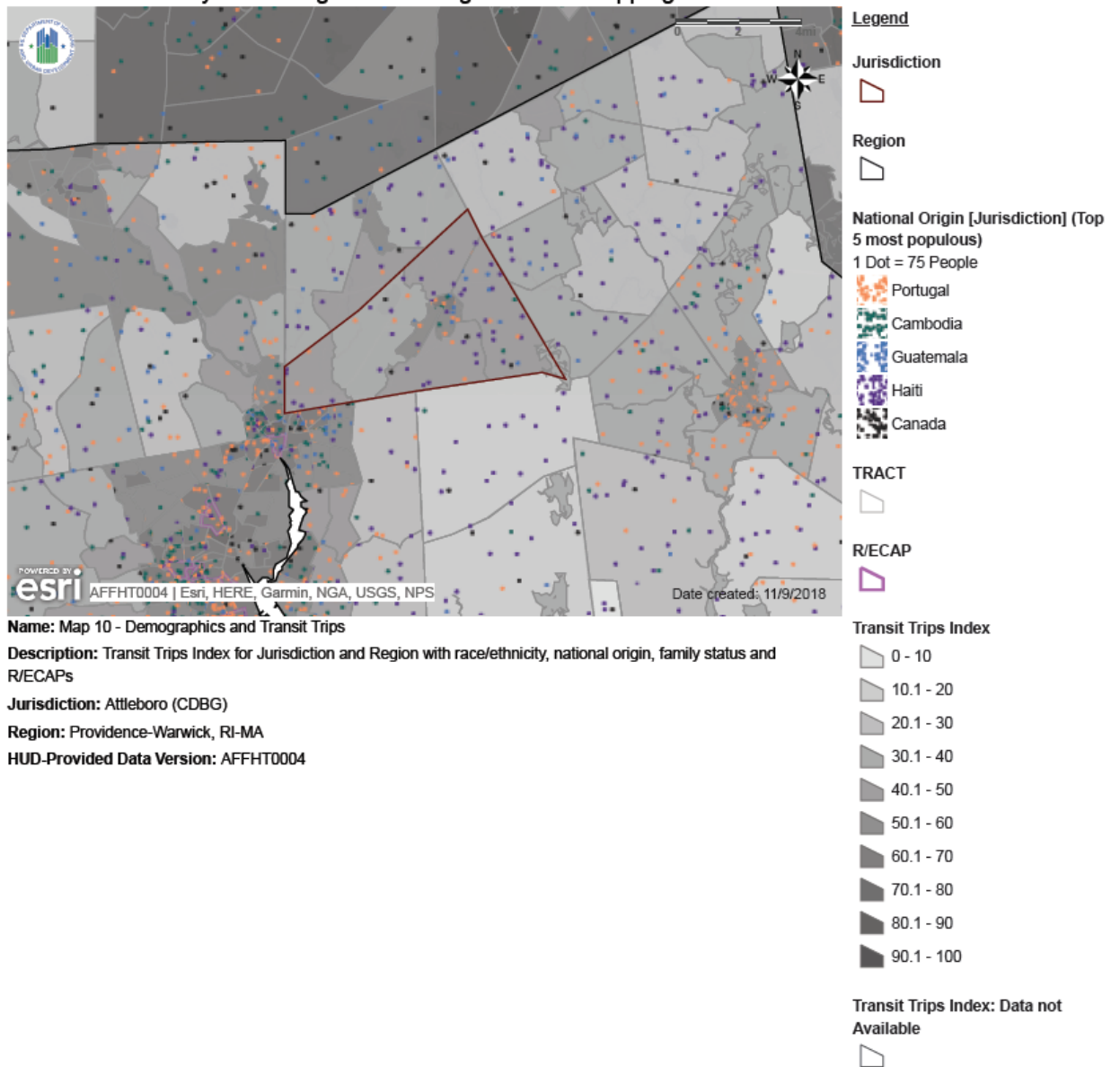
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



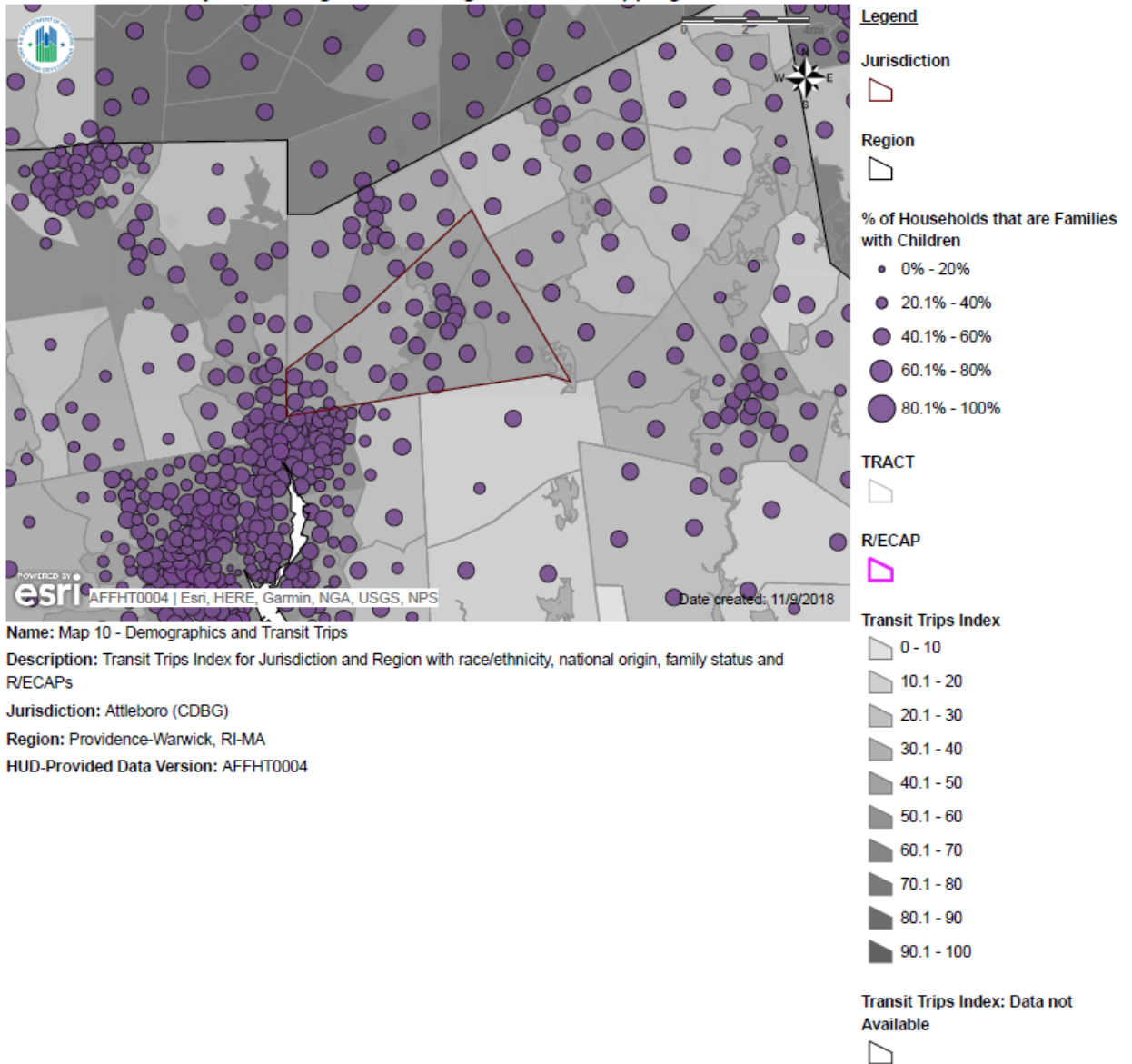
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



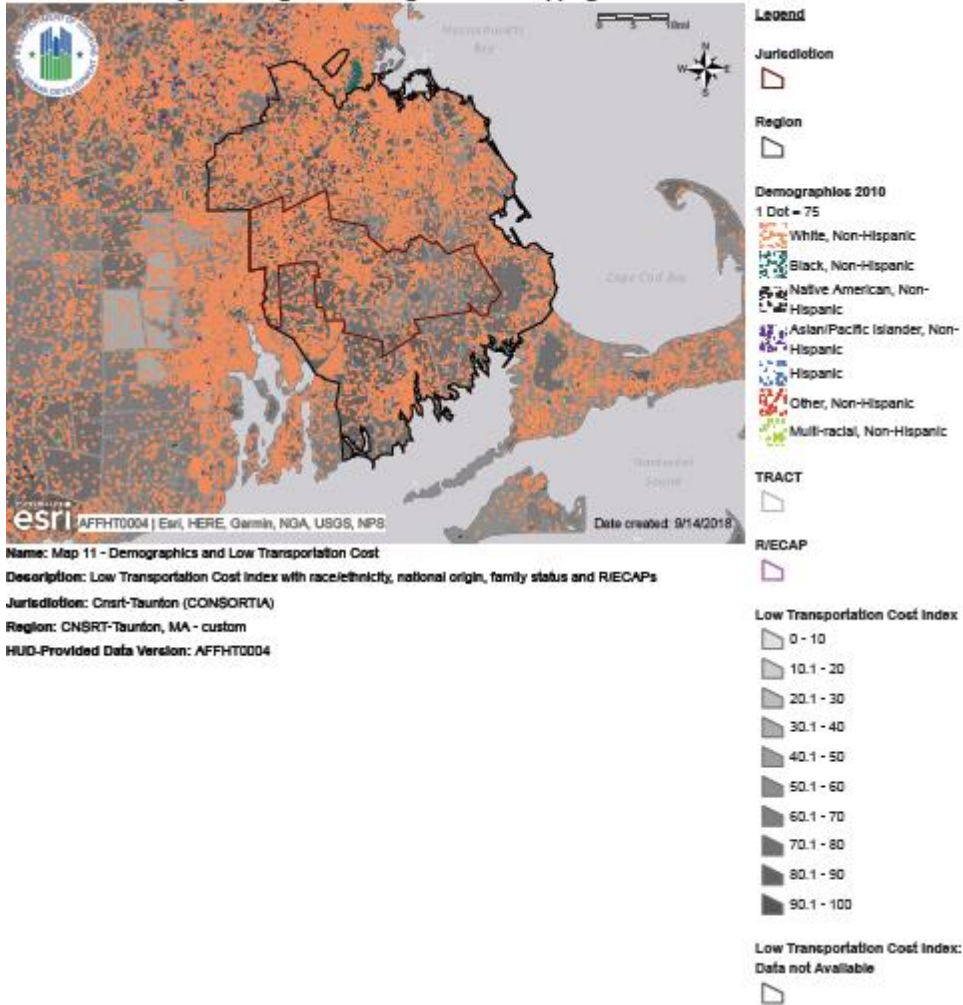
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



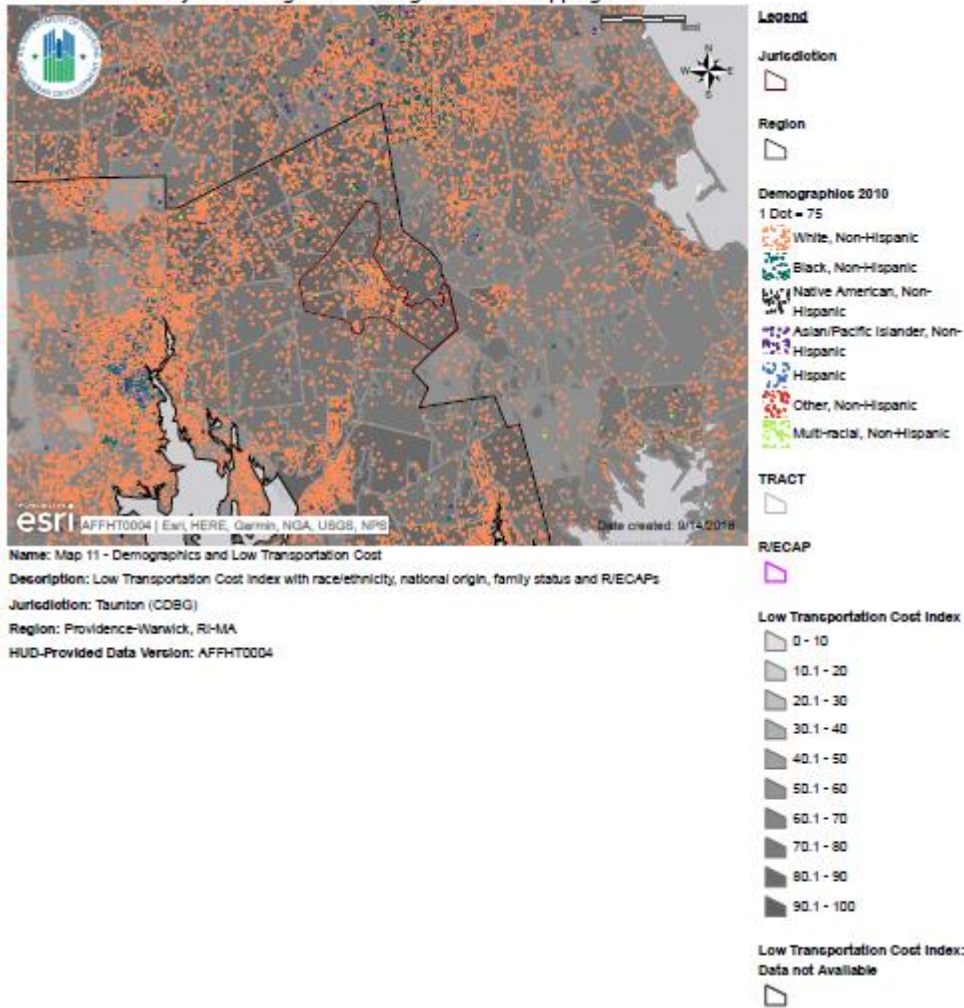
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



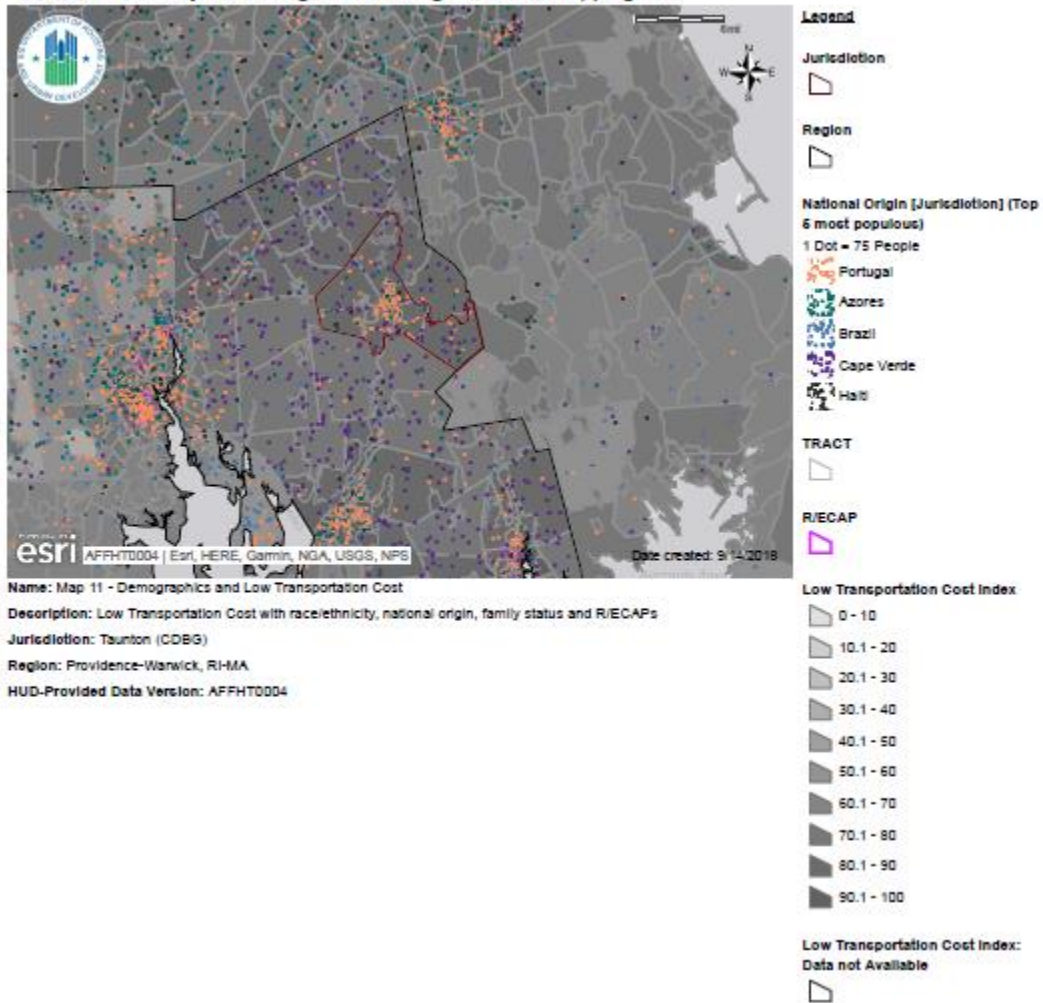
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



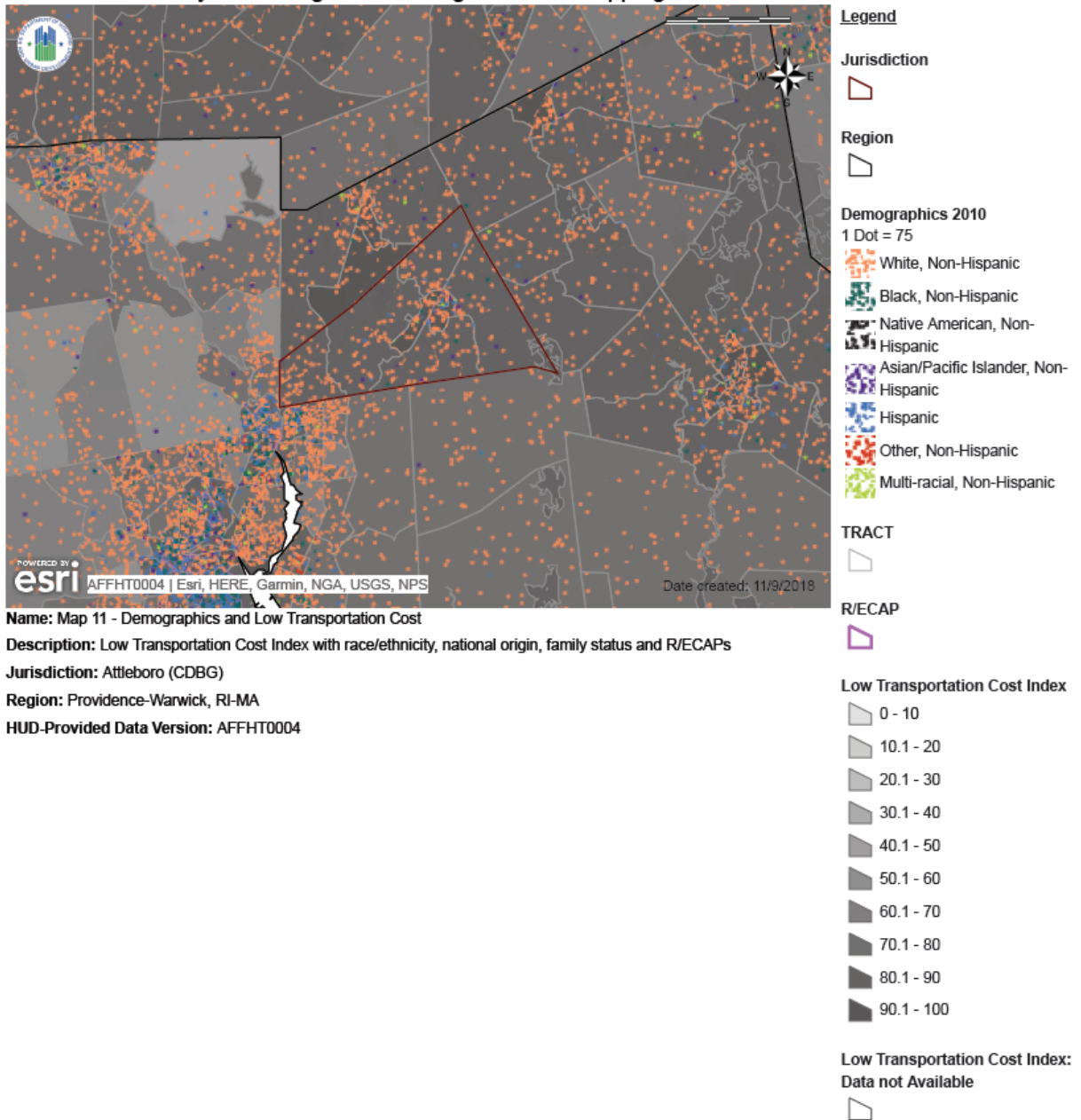
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



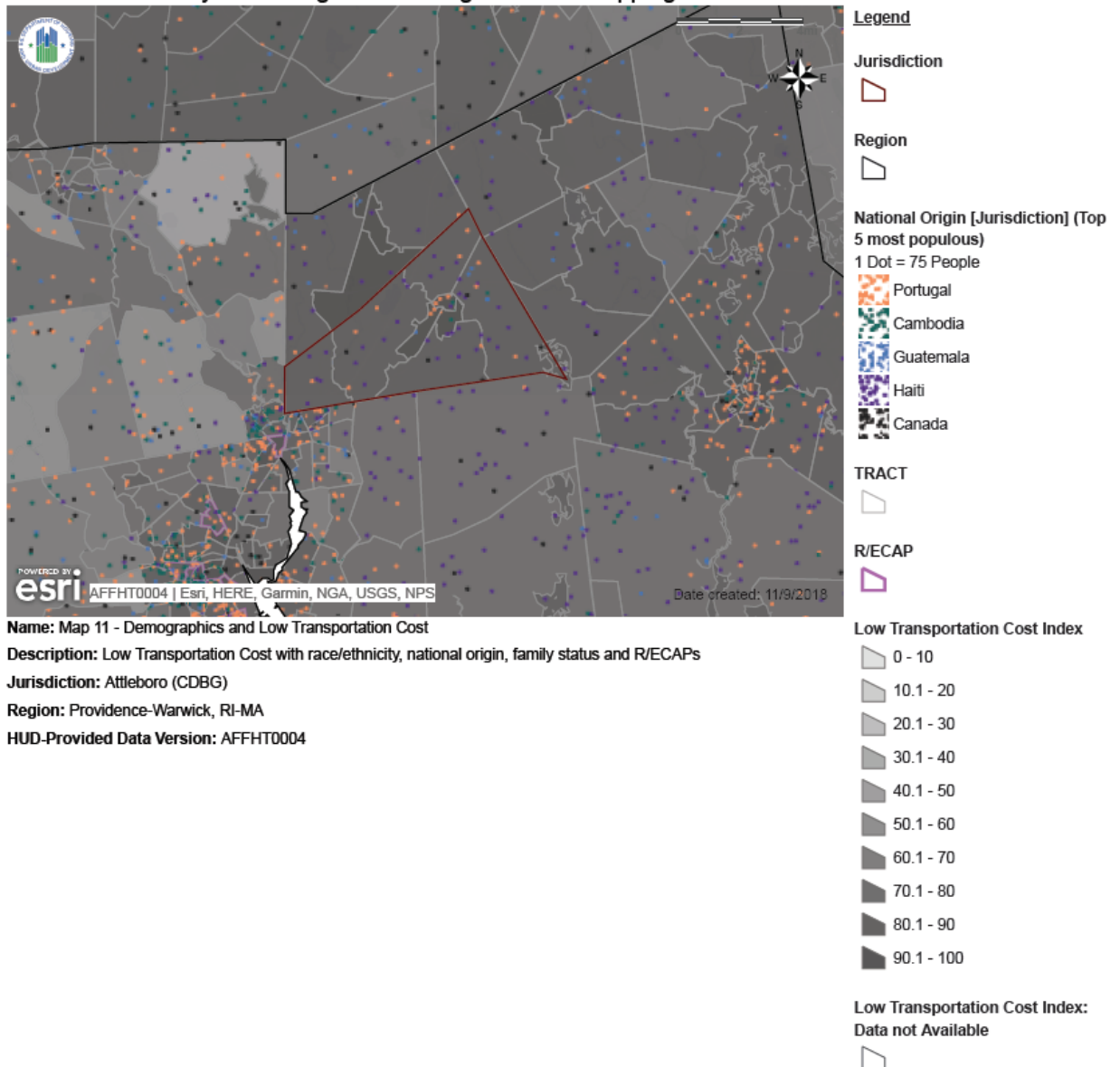
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



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

Across the Consortium and the Cities of Attleboro and Taunton, there are minimal disparities in both transit trips and transportation cost. To the extent that there are, Black and Hispanic residents have slightly higher access to frequent and low-cost transportation than do non-Hispanic White and Asian and Pacific Islander residents. In general, transportation costs are low across the Consortium and the two cities, but transit frequency is also low.

In both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, disparities are more pronounced with Black and Hispanic residents having significantly greater access to frequent and low-cost transportation than other groups. Additionally, although

transportation costs are similar at the regional level to what they are at the Consortium and city levels, transit frequency is much greater in both defined regions.

- 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.*

In the Consortium, transportation is most affordable near the respective centers of Attleboro, North Attleboro, Taunton, and Middleborough. Although those parts of Attleboro and Taunton are relatively diverse in comparison to the Consortium as a whole, the corresponding areas within North Attleboro and Middleborough are predominantly non-Hispanic White. The center of North Attleboro has relatively few residents from the most populous national origin groups in the Consortium while Middleborough has a significant Brazilian-American population. The demographics of central Attleboro and Taunton with respect to national origin are discussed below. Families with children have disproportionately low access to these areas with affordable, frequent transportation. The same patterns that apply with respect to low-cost transportation apply to frequent transportation with the caveat that access is especially high in Middleborough. This stands to reason as that area is served by the Massachusetts Bay Transportation Authority's (MBTA) Middleborough/Lakeville commuter rail line.

In the City of Taunton, transportation is both more affordable and more frequent in the center of the city. Because there is little segregation by race and ethnicity within the City of Taunton, the demographics of this area are similar to those citywide. With respect to national origin, by contrast, people of Portuguese, Azorean, Cape Verdean, and Brazilian national origin disproportionately live near the city center in areas with relatively high access to affordable, frequent transportation. At the same time, families with children are more likely to live outside of city center in areas with less access to affordable, frequent transportation.

Within the City of Attleboro, transportation is more affordable and more frequent in the center of the city where the population is comparatively heavily Hispanic and Asian and Pacific Islander. That area also has higher concentrations of individuals of Guatemalan and Cambodian national origin and slightly lower concentrations of families with children than the city as a whole.

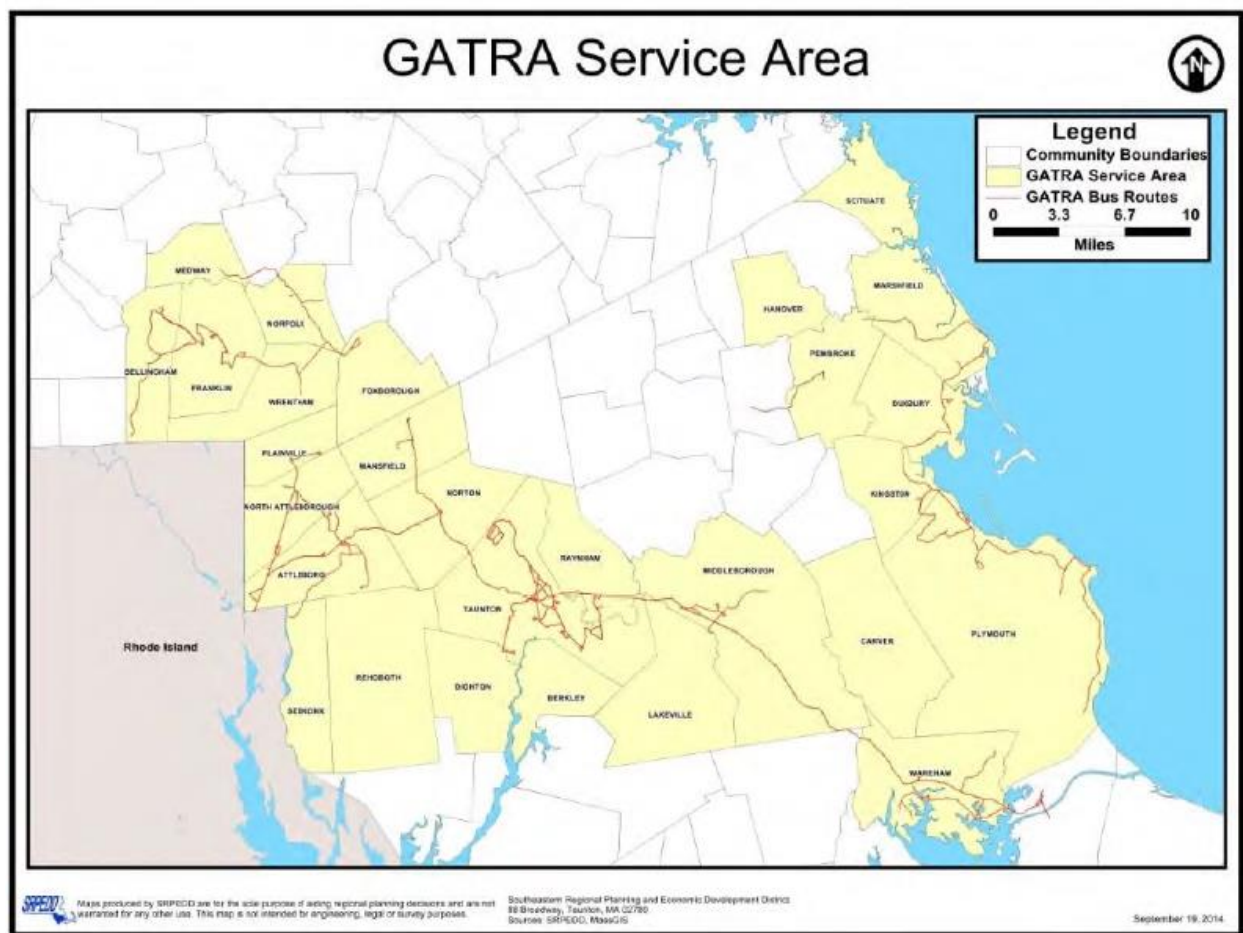
In the custom region, transportation is much more affordable and frequent to the north of the Consortium, including in both heavily Black and Hispanic cities like Brockton and Randolph and in predominantly non-Hispanic White and Asian and Pacific Islander commuter suburbs of Boston. There are no evident patterns with respect to disparate access by protected class members to these transit-rich areas served by the MBTA.

In the Providence-Warwick, RI-MA Metropolitan Statistical Area, by contrast, access to affordable, frequent transportation is much higher in disproportionately Black and Hispanic cities like Providence, Pawtucket, and New Bedford as well as in heavily Portuguese, Azorean, and Cape Verdean communities like Fall River. These places tend to have relatively few families with children.

- iii. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge,*

discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

The Greater Attleboro-Taunton Regional Transit Authority (GATRA) is the primary agency that provides bus service within the Consortium. As the map below shows, GATRA provides bus service within and between the communities of the Consortium with some connections outside of the Consortium as well as to rail stations with service to Boston. Some towns within the Consortium, including Seekonk, Dighton, Berkley, Lakeville, and Carver lack bus service. These areas tend to be disproportionately non-Hispanic White and to have high concentrations of families with children. Filling in these gaps in bus service in conjunction with the development of affordable housing for families could be part of a multi-faceted strategy for foster residential racial integration. GATRA bus fares are relatively affordable, but service headways are often long, making commuting by bus difficult for many workers.

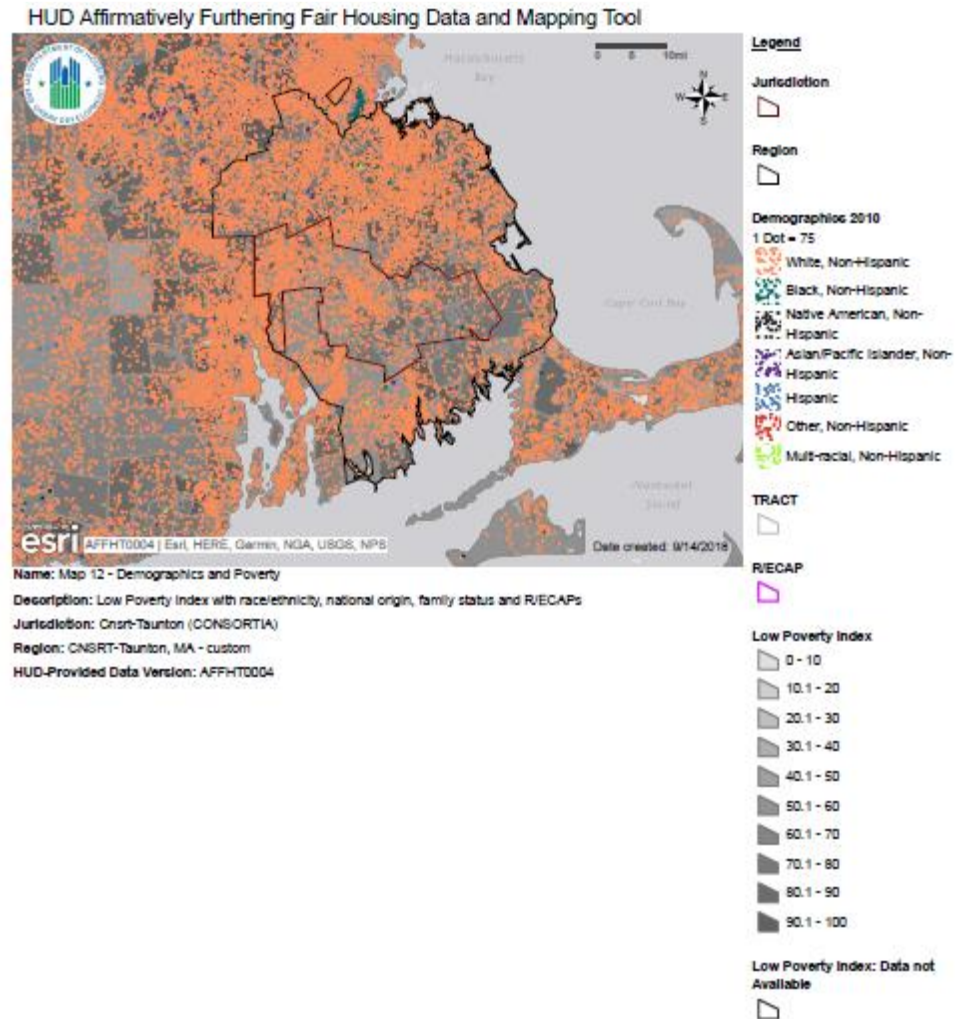


As the map below of the MBTA's commuter rail system shows, there are four commuter rail stations within the Consortium. The Mansfield, Attleboro, and South Attleboro Stations are on the Providence/Stoughton Line and the Middleborough/Lakeville Station is on the line of the same name. Both lines terminate at Boston's South Station in the north. The Providence/Stoughton Line also connects riders to suburban job centers like Route 128. The areas within the Consortium that have direct commuter rail service are disproportionately non-

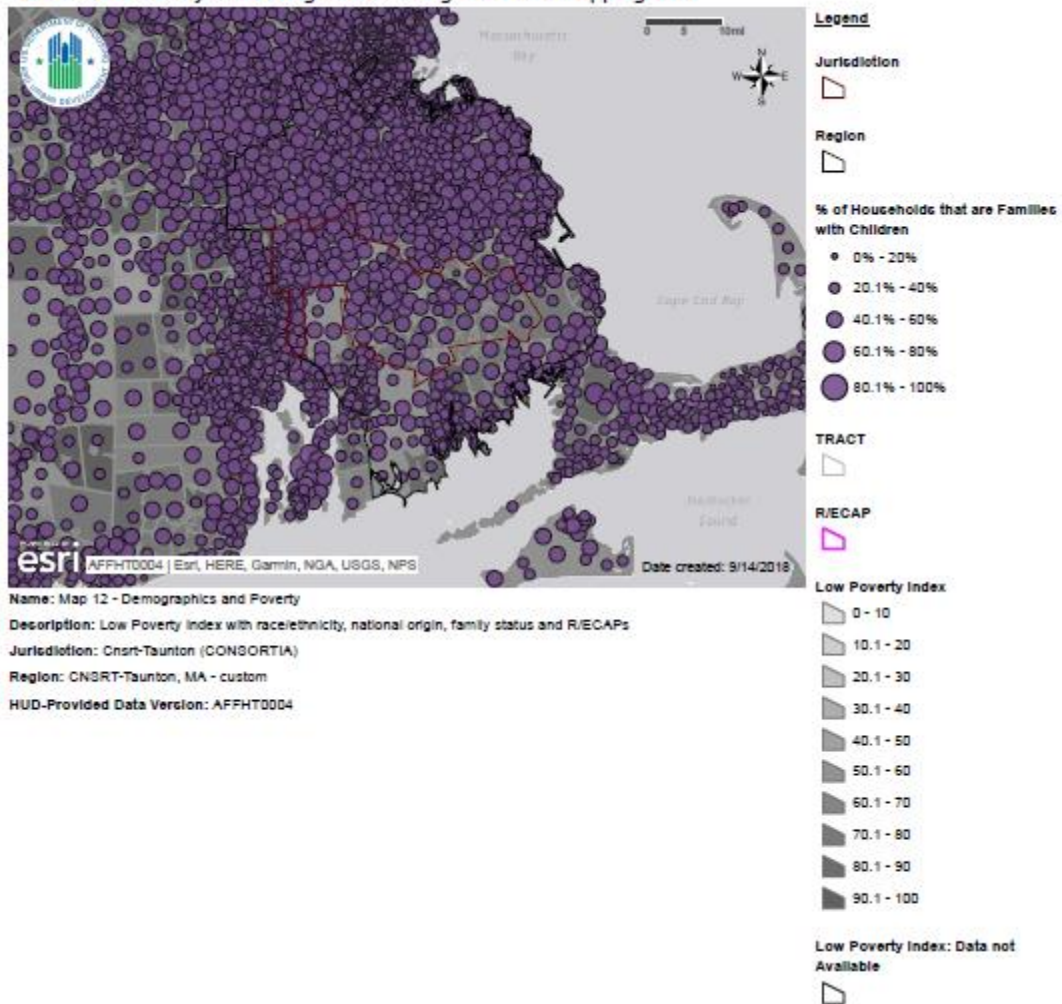
Hispanic White. The expansion of commuter rail service to the City of Taunton would foster greater transit equity in light of the more racially and ethnically diverse population of that city in comparison to the Consortium as a whole.



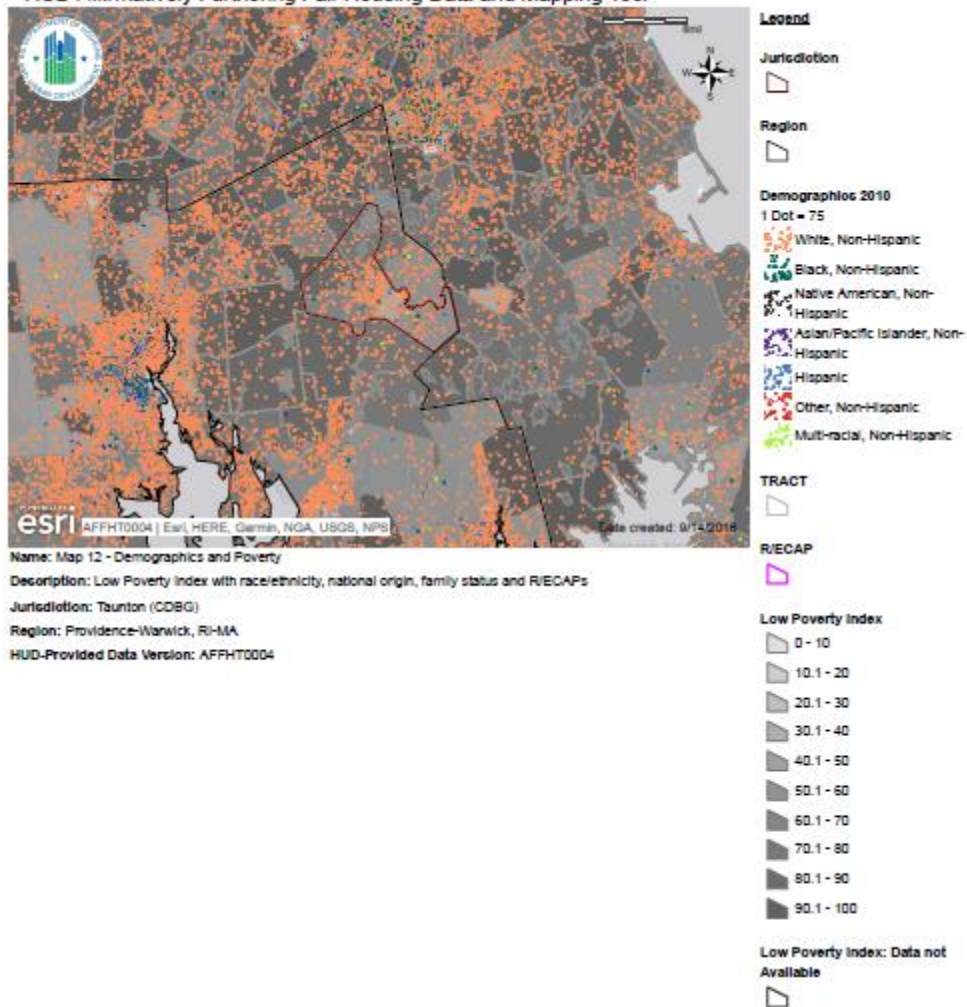
d. Access to Low Poverty Neighborhoods



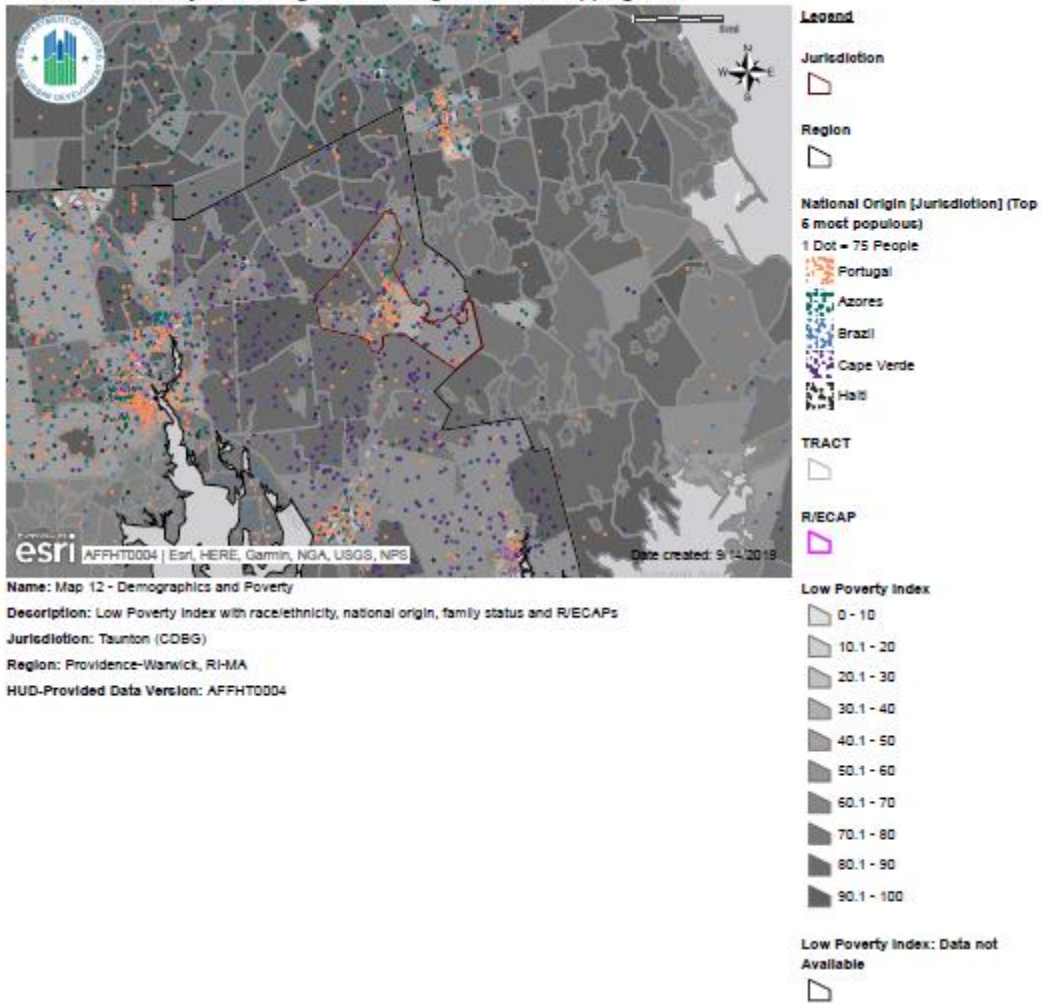
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



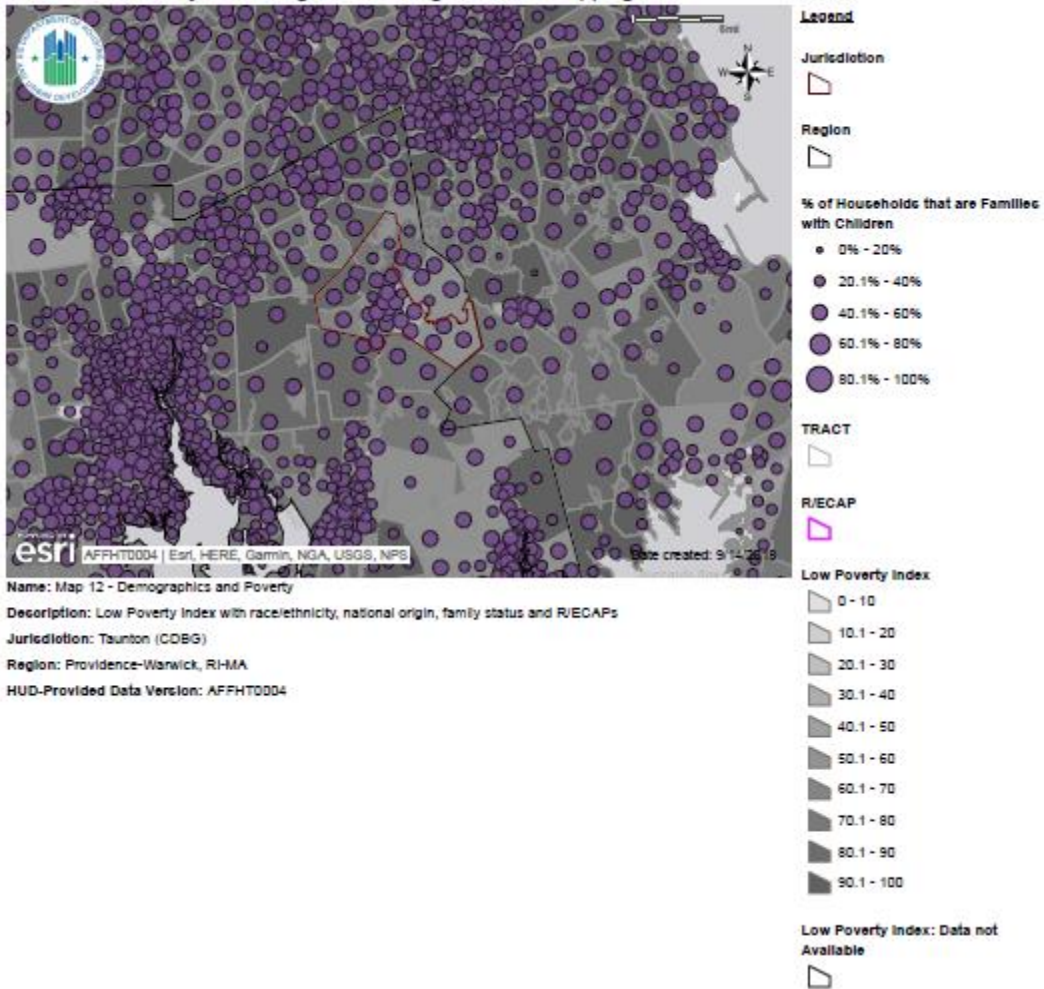
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



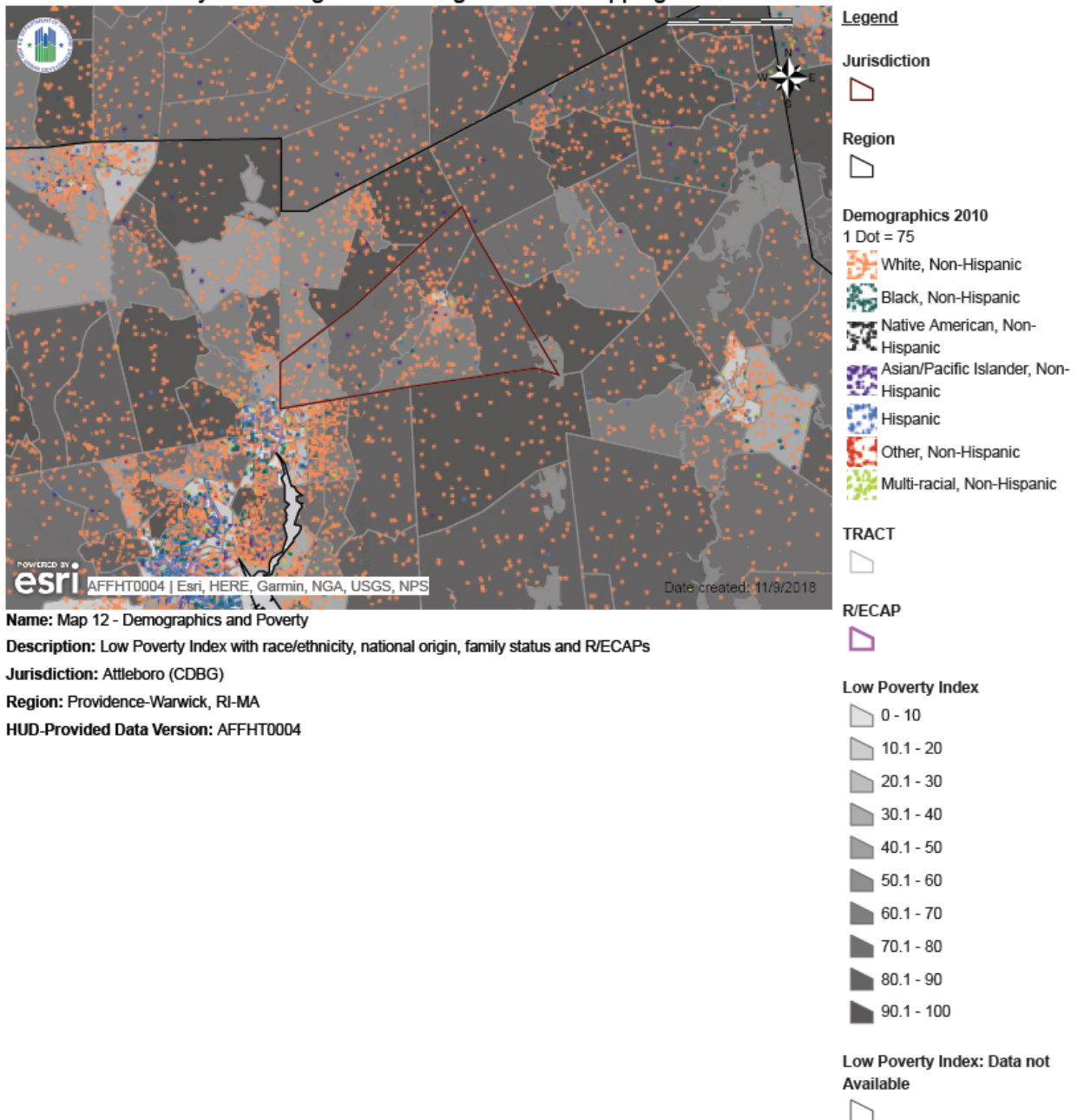
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



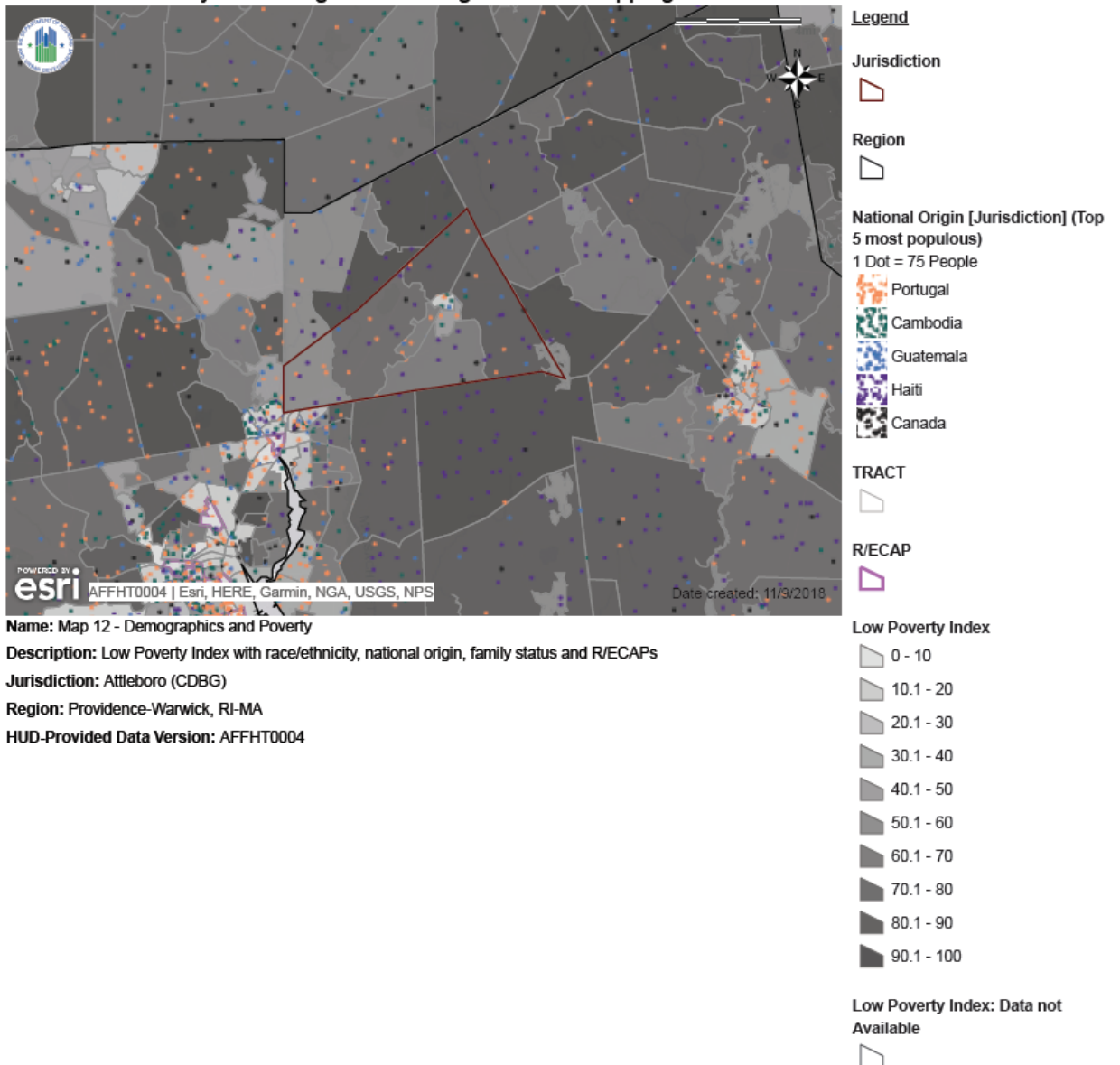
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



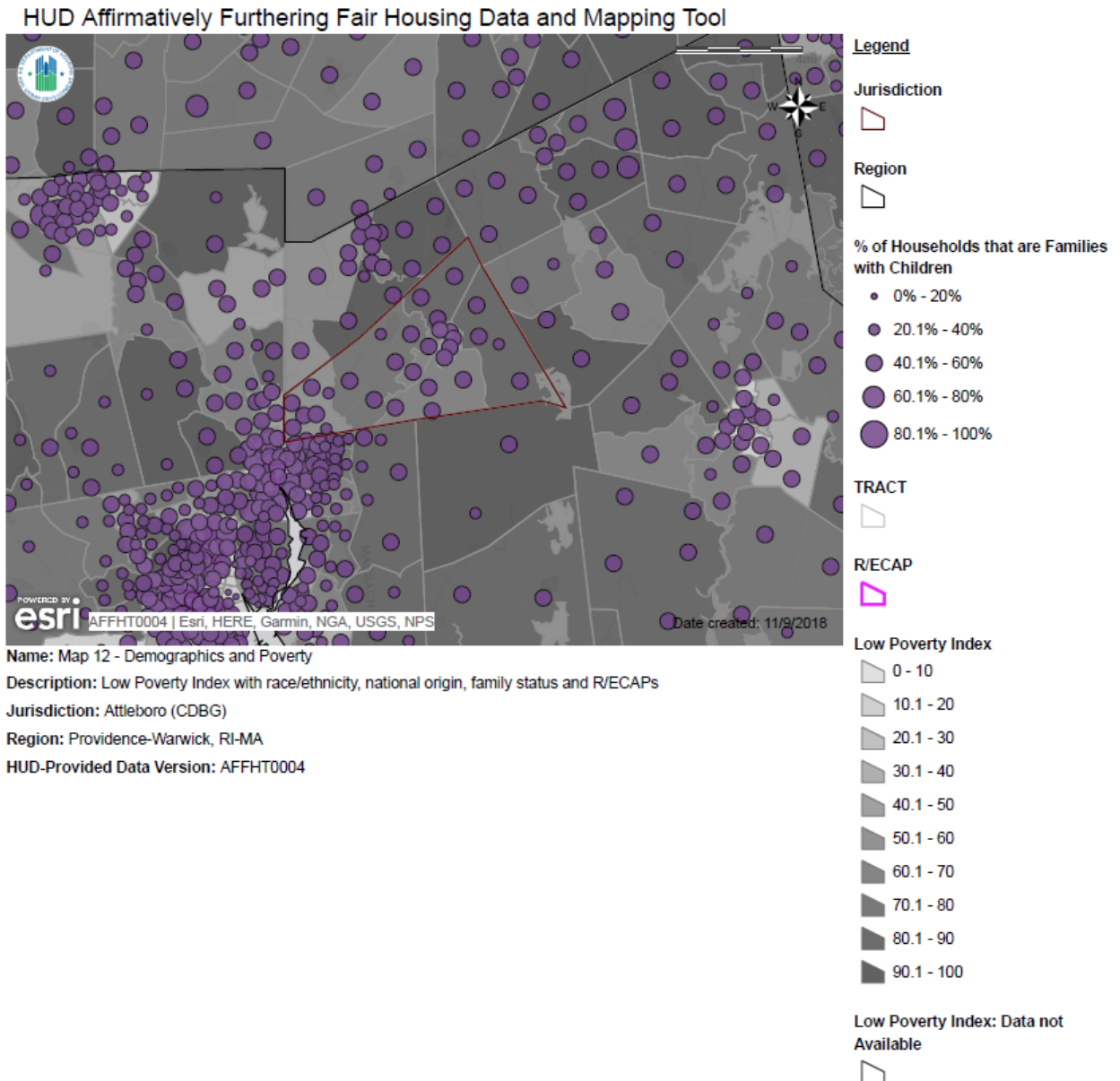
Name: Map 12 - Demographics and Poverty

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

Jurisdiction: Attleboro (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004



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

In the Consortium, non-Hispanic White and Asian and Pacific Islander residents have significantly higher access to low-poverty neighborhoods than Black and Hispanic residents. It is important to note that, after controlling for poverty status, Asian and Pacific Islander residents, but not non-Hispanic White residents, also have limited access to low-poverty neighborhoods. The same pattern is in evidence for the City of Taunton, the custom region, and the Providence-Warwick, RI-MA Metropolitan Statistical Area. In the City of Attleboro, Hispanic residents and Asian and Pacific Islander residents with incomes below the poverty line have disproportionately limited access to low-poverty neighborhoods, but members of the small Black community have levels of access that are similar to those of non-Hispanic White residents.

- 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.*

In the Consortium, the areas with the highest access to low poverty concentration include North Attleboro, Seekonk, Norton, and Lakeville while those with the least access are the centers of Attleboro, Taunton, and Middleborough, respectively. The former set of areas is predominantly non-Hispanic White. Central Attleboro and Taunton are more heavily Black and Hispanic than the Consortium as a whole and, in the case of Taunton in particular, more heavily Portuguese-American, Azorean-American, and Cape Verdean-American. Middleborough is predominantly non-Hispanic White but also has a significant population that is of Brazilian national origin. Families with children tend to live in the areas with highest access to low poverty concentration.

At a more granular level, within the City of Taunton, areas with lower poverty tend not to vary from those with higher poverty by race and ethnicity, but higher poverty areas tend to have higher concentrations of people of Portuguese, Azorean, and Cape Verdean national origin. Families with children are most concentrated in areas of moderate poverty in the south of the city. In Attleboro, Hispanic residents and Cambodian-American residents are concentrated in higher poverty areas, but Black residents and Haitian-American residents, along with families with children, are not.

In the custom region, disparities are much starker with pockets of high poverty including New Bedford, Fall River, Brockton, and Randolph. With the exception of Fall River, these areas are all much more heavily Black and Hispanic than the region as a whole. Fall River has a significant population of people of Portuguese and Azorean national origin but is predominantly non-Hispanic White. Lower poverty areas in the custom region tend to have proportionally more families with children.

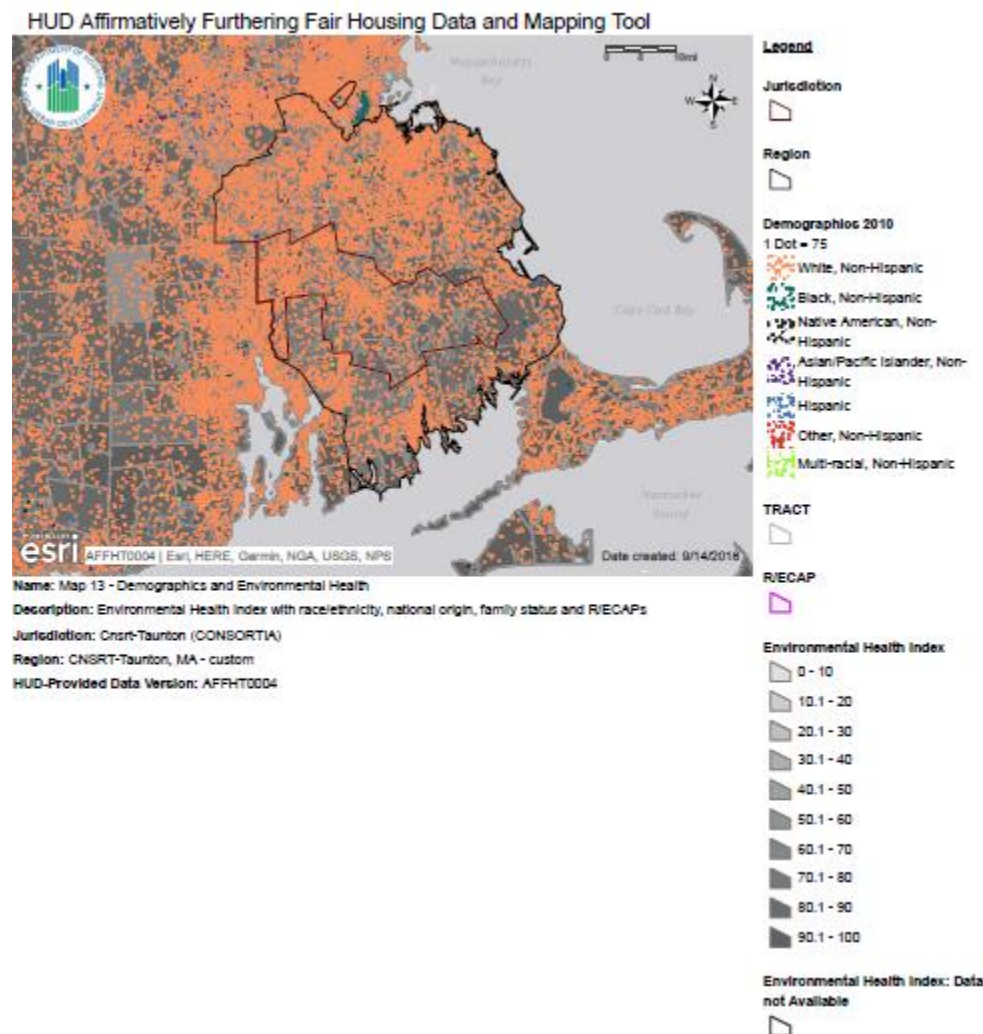
Similarly, in the Providence-Warwick, RI-MA Metropolitan Statistical Area, areas with high poverty including western and southwestern Providence and the City of Pawtucket are home to concentrations of Black and Hispanic residents as well as people of Guatemalan, Dominican, and Cape Verdean national origin. People of Portuguese and Azorean are more likely to live in areas of moderate poverty exposure. By contrast, non-Hispanic White residents and families with children are concentrated in areas with low exposure to poverty.

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

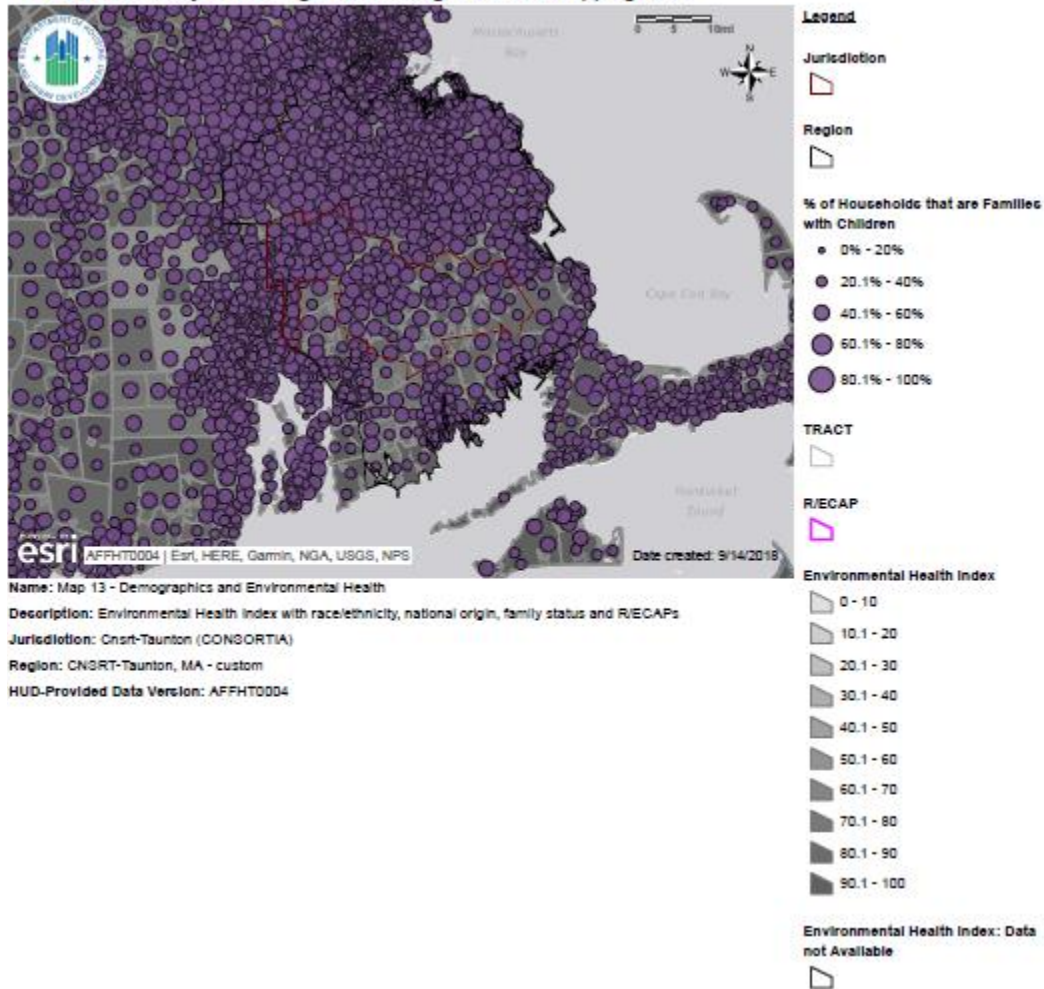
There are few areas within the Consortium that have particularly high concentrations of poverty, but the city centers in Attleboro and Taunton are, to some extent, exceptions. Although neither area exceeds the poverty rate threshold for a HUD-defined R/ECAP, Census Tract 6314 in Attleboro has a poverty rate of 35.5%, and Census Tract 6140 in Taunton has a poverty rate of 29.3%. Strategically targeting family-occupancy affordable housing development outside of these areas, consistent with the funding priorities in the Massachusetts Department of Housing and Community Development's Qualified Allocation Plan for the Low Income Housing Tax Credit

program, and providing mobility counseling to Housing Choice Voucher holders could prevent the further concentration of poverty in these areas. In much more of the Consortium, public policy barriers to affordable housing and mobility for low-income families serve to preserve disproportionately low exposure to poverty while exacerbating poverty concentration in cities including Brockton, Providence, Pawtucket, and New Bedford, in addition to Taunton and Attleboro.

e. Access to Environmentally Healthy Neighborhoods



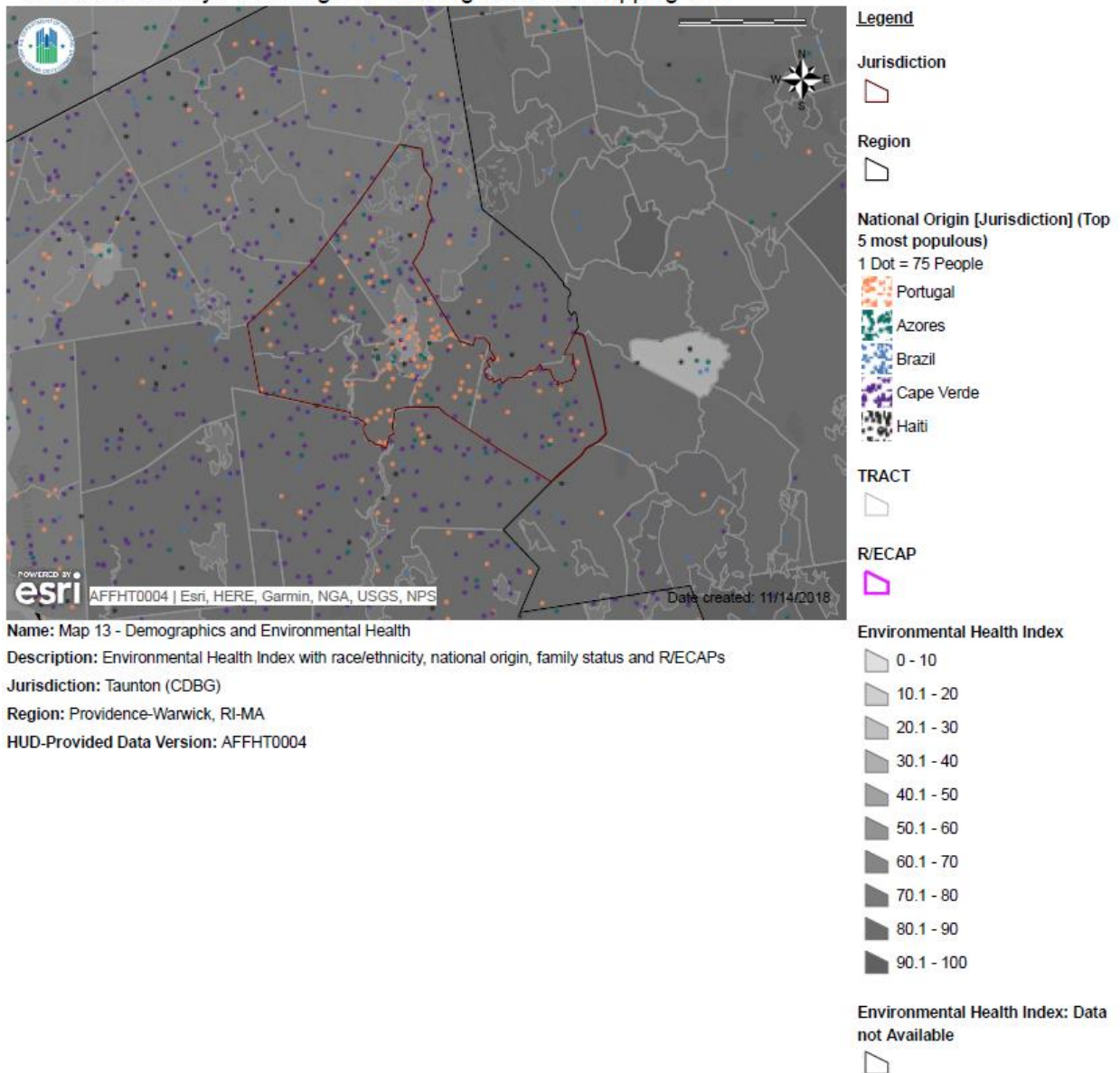
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



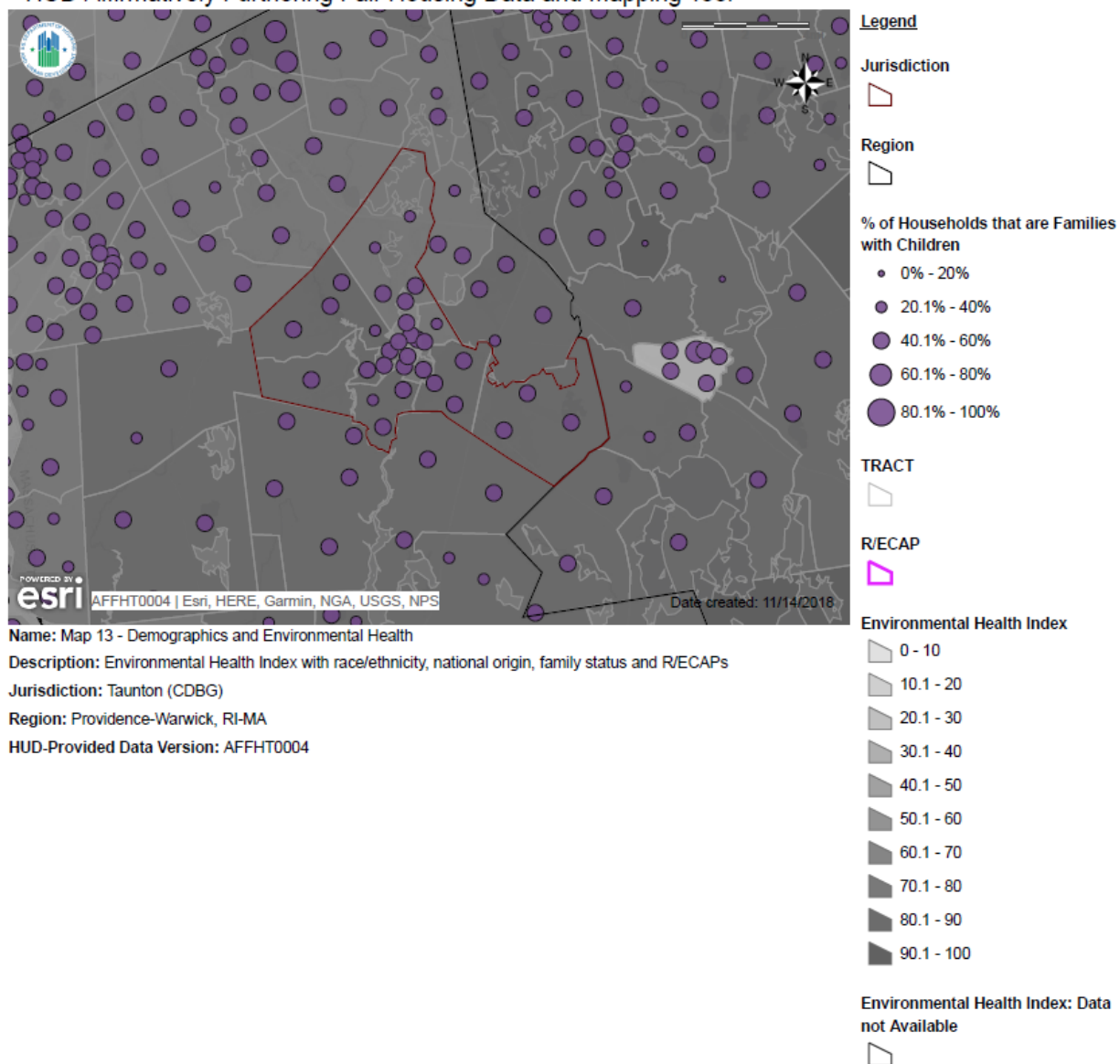
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



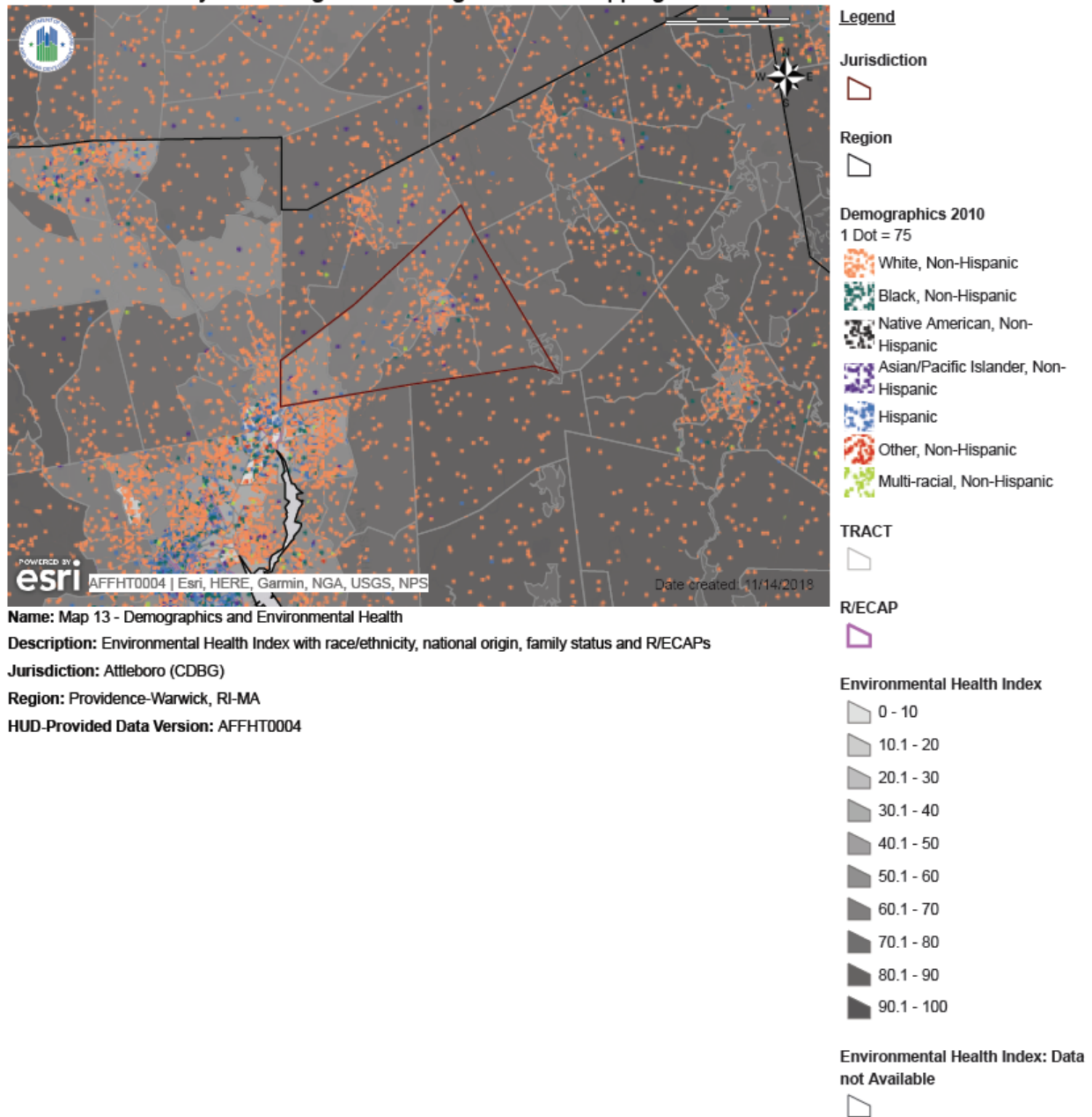
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



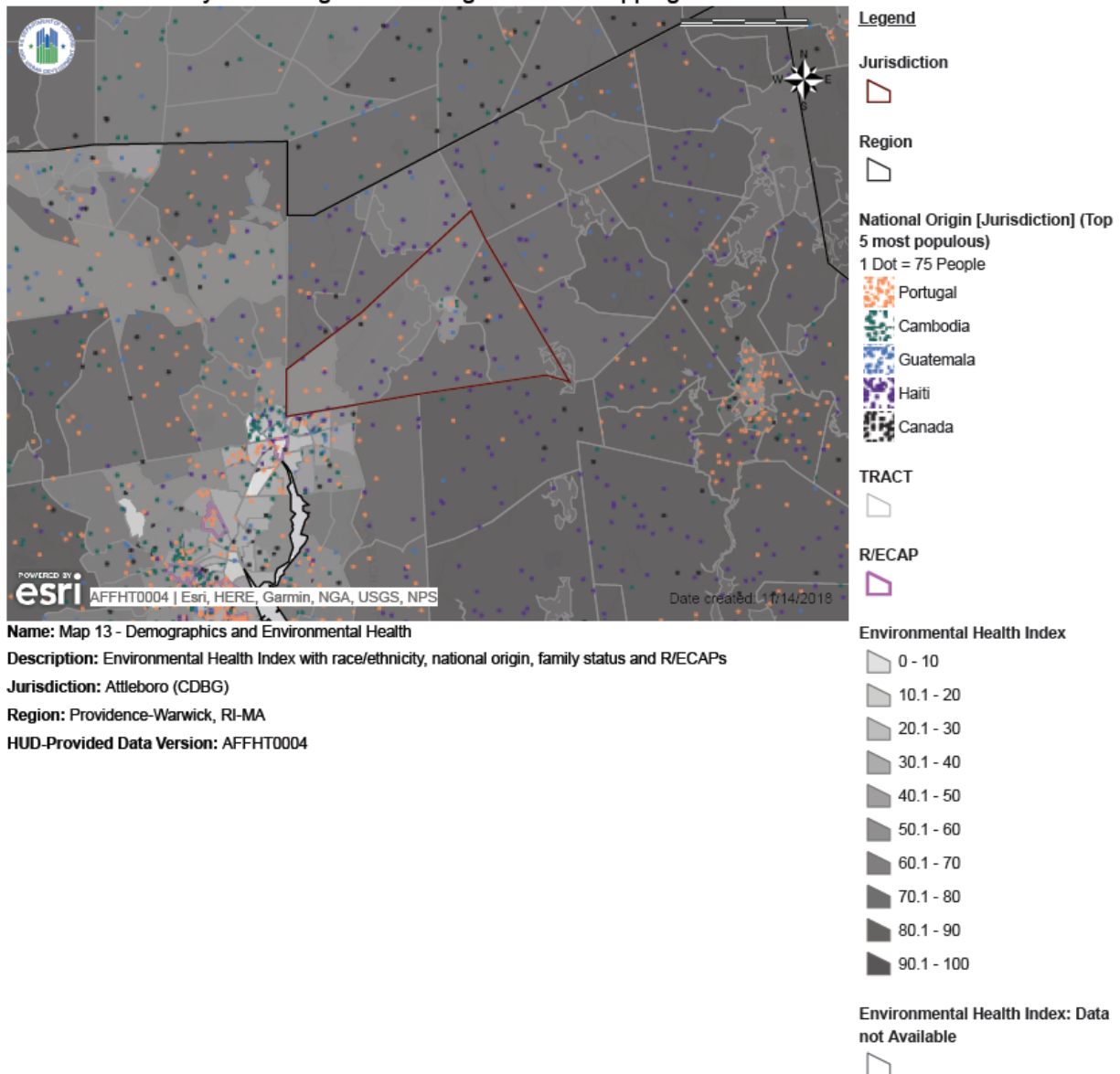
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



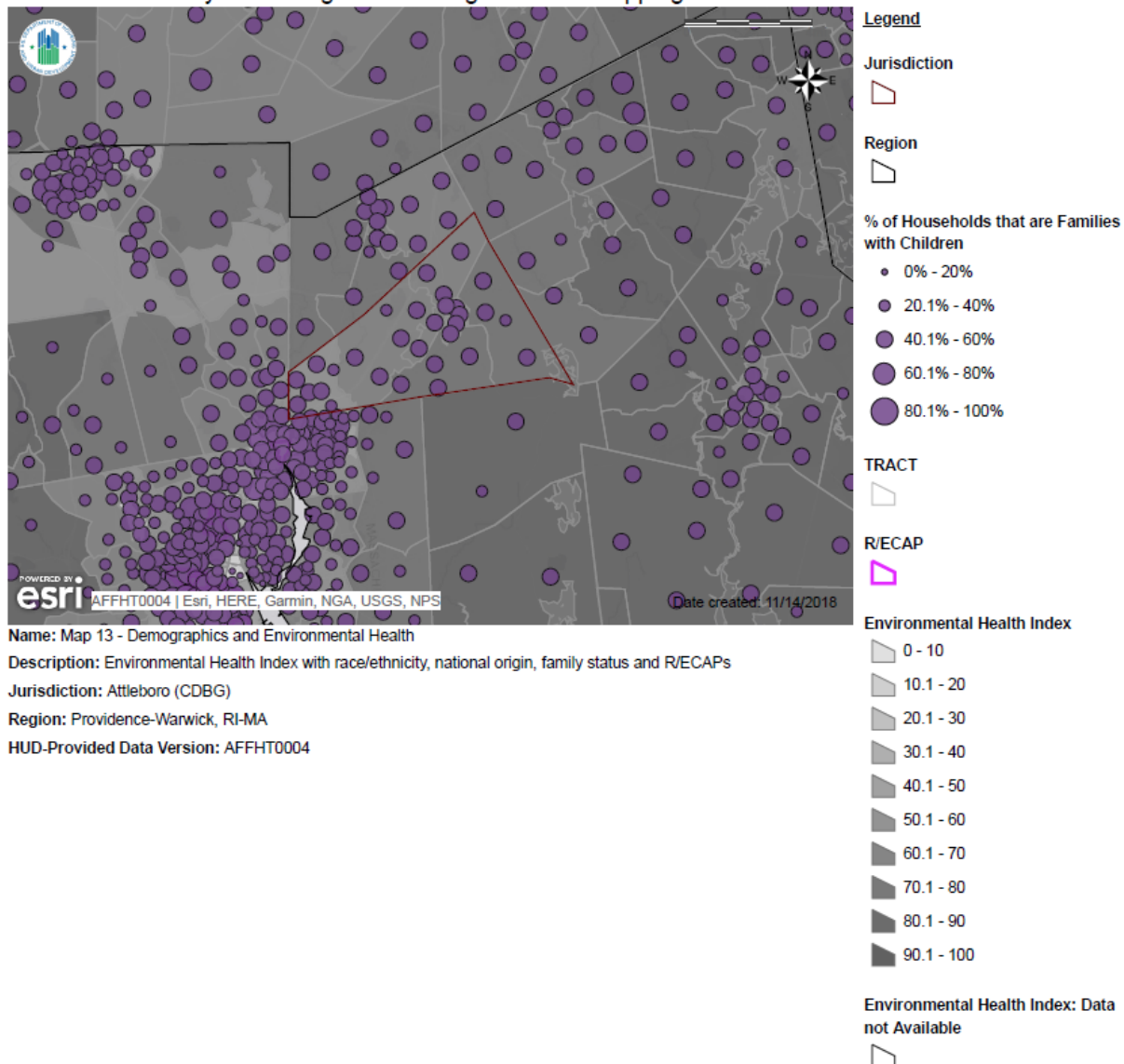
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



- i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

In the Consortium, all racial and ethnic groups have high access to environmentally healthy neighborhoods though non-Hispanic Whites have slightly higher access than others and Hispanics have the least access by a small margin. It is worth noting that, when controlling for poverty status, Asians and Pacific Islanders have substantially lower access than other groups. This may be an aberration resulting from a small sample size, or it could reflect the conditions faced by low-income Cambodian-American residents in the center of the City of Attleboro. In both the City of Taunton and the City of Attleboro, a similar pattern is present with the caveat that overall access to environmentally healthy neighborhoods is lower in Attleboro than it is in Taunton and the remainder of the Consortium.

In the custom region, overall access to environmentally healthy neighborhoods is high, and, while non-Hispanic Whites continue to have the greatest access to such neighborhoods, Asians and Pacific Islanders, rather than Hispanics, have the least access. In the Providence-Warwick, RI-MA Metropolitan Statistical Area, by contrast, disparities in access to environmentally healthy neighborhoods are stark rather than subtle. In that defined region, Black and Hispanic residents have far lower access to environmentally healthy neighborhoods than do non-Hispanic Whites and, to a lesser extent, Asians and Pacific Islanders. Controlling for poverty status eliminates the gap between Black and Hispanic residents, on the one hand, and Asians and Pacific Islanders, on the other, but has no meaningful effect on the disparity between those groups and non-Hispanic Whites.

- 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.*

Within the Consortium, there are only a few Census Tracts with relatively low access to environmentally healthy neighborhoods. These include a tract at the center of the Town of Middleborough in addition to tracts in central Taunton and Attleboro and a tract in the far southwestern portion of Attleboro. The area within Middleborough with low access to environmental health is predominantly non-Hispanic White but has a significant population of Brazilian-Americans. The portion of Taunton with low access to environmental health is more heavily Black and Hispanic than the Consortium as a whole but not significantly more heavily Black and Hispanic than the City of Taunton as a whole. The area has a large population of Portuguese and Azorean national origin. The two sections of the City of Attleboro with relatively low levels of access to environmental health have differing characteristics. Central Attleboro is disproportionately Hispanic and Asian and Pacific Islander and has concentrations of people of Cambodian and Guatemalan national origin. Southwestern Attleboro is predominantly non-Hispanic White but also has a small concentration of people of Haitian national origin. There generally are no concentrations of families with children in parts of the Consortium with limited access to environmental health.

In both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, there is relatively low access to environmental health in urban centers that are disproportionately Black and Hispanic and that have concentrations of people of Portuguese, Azorean, Cape Verdean, Guatemalan, Dominican, and Haitian national origin including Providence, Pawtucket, New Bedford, Fall River, and Brockton. Within cities that are internally segregated like Providence, more heavily non-Hispanic White neighborhoods on the east side of town near Brown University are more environmentally friendly than those in heavily Black and Hispanic neighborhoods to the west. In general, areas with low access to environmental health are not those with concentrations of families with children.

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

The table below reflects the number of sites for which there are reports of contamination in the cities and towns of the Consortium, as reported by the Massachusetts Department of Environmental Protection. The extent of adverse effects on neighbors of contaminated sites clearly is not the same for all contaminated sites as the extent of the contamination is a critical variable. Nonetheless, relative concentration of contaminated site reports may be broadly reflective of variations in access to environmentally healthy neighborhoods. In general and unsurprisingly, the largest municipalities within the Consortium had the highest number of reported sites. At the same time, the number of sites in those communities was higher than would be predicted solely by reference to differences in population, suggesting that places with industrial uses have lower access to environmental health. These areas are more heavily Black and Hispanic than the Consortium as a whole.

Contaminated Site Records by Municipality, Massachusetts Department of Environmental Protection, 2018

Municipality	Number of Reported Sites
Attleboro	364
Berkley	31
Carver	74
Dighton	50
Freetown	97
Lakeville	54
Mansfield	139
Middleborough	182
North Attleboro	187
Norton	83
Plainville	82
Raynham	121
Seekonk	151
Taunton	433

f. Patterns in Disparities in Access to Opportunity

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

In general, Black and Hispanic residents have lower access to opportunity across multiple indicators, to a slight degree within the Consortium and the Cities of Attleboro and Taunton and to a much more significant degree within the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area. Within the Consortium, these disparities are not closely linked to patterns of segregation, integration, and R/ECAPs as the Consortium is comparatively integrated. In both defined regions, however, these patterns are intimately related to segregation and R/ECAPs. The places described below as having low access to opportunity across multiple

indicators are also home to a disproportionate share of the two overlapping regions' Black and Hispanic populations and all of the area's R/ECAPs.

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

The vast majority of the Consortium experiences high access to opportunity across multiple indicators. The central portions of the Cities of Taunton and Attleboro and the Town of Middleborough are the primary exceptions and experience low access to opportunity across multiple factors. In the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, places with high access to opportunity across multiple indicators include suburbs within Rhode Island to the north and south of the City of Providence and much of Norfolk County, excluding the Cities of Brockton and Randolph. Places with low access to opportunity across multiple indicators include much of the Cities of Providence (particularly its western and southwestern portions), Pawtucket, Fall River, New Bedford, Brockton, and Randolph.

2. Additional Information

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

This Analysis has integrated local data into the discussion of disparities in access to opportunity in response to the questions above.

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

A thorough discussion of the Consortium members' efforts is included above, as well as in the descriptions of the contributing factors below.

3. Contributing Factors of Disparities in Access to Opportunity

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

- Access to financial services

Access to financial services does not significantly contribute to disparities in access to opportunity within the Consortium and the Cities of Taunton and Attleboro but do contribute to disparities in access to opportunity within both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area. In order to avoid duplication

with the analysis of the contributing factor concerning lending discrimination, this discussion focuses on physical access to bank branch locations and exposure to predatory consumer lenders like payday lenders and car title lenders. The table below shows the number of branches of banks regulated by the Federal Deposit Insurance Corporation in the Consortium by municipality.

FDIC-Regulated Bank Branches by Municipality

Municipality	FDIC-Regulated Full-Service Brick and Mortar Branches
Attleboro	8
Berkley	0
Carver	2
Dighton	2
Freetown	1
Lakeville	2
Mansfield	5
Middleborough	5
North Attleboro	3
Norton	3
Plainville	3
Raynham	7
Seekonk	6
Taunton	10

Although this data does not reflect the full range of mainstream financial institutions, which also include credit unions, it provides some insight. The most racially and ethnically diverse parts of the Consortium, the City of Taunton and the central portion of the City of Attleboro, have physical access to brick and mortar bank branches. In the case of Taunton, that level of access might be disproportionately low relative to the City's population. For example, there is roughly one FDIC-regulated full-service brick and mortar bank branch for every 5,500 residents whereas, in predominantly non-Hispanic White Seekonk, there is roughly one branch for every 2,500 residents. With that said, there are other predominantly non-Hispanic White municipalities within the Consortium, such as Berkley, that have even lower access or that, like Carver, have access that is similar to that of Taunton. Also, although there are more residents for each bank branch in Taunton than in the Consortium as a whole, it is likely that the average distance that a resident of Taunton would have to travel in order to access a bank branch is lower than some areas where there are fewer bank branches per resident.

From a regional perspective, however, the picture is quite different because some other urban centers are geographically large and internally segregated. The presence of downtown bank branches does not guarantee access to residents throughout city limits. This phenomenon is evident in the City of Providence. Heavily Black and/or Hispanic neighborhoods like Elmwood and West End have very few bank branches, and those branches that they have tend to be located at the periphery of the neighborhoods. Lack of access to bank branches for residents of these neighborhoods contributes to disparities in access to opportunity by impeding economic mobility

and pushing consumers toward predatory financial products. Resorting to car title loans if a car is repossessed, for example, can reduce access to employment and to transportation.

- Availability, type, frequency, and reliability of public transportation

The availability, type, frequency, and reliability of public transportation significantly contributes to disparities in access to opportunity within the Consortium, as well as regionally, in three important respects. First, there are significant gaps in bus service within the Consortium, including in Seekonk, Dighton, Berkley, Lakeville, and Carver. These communities are, to varying extents, predominantly non-Hispanic White areas that have relatively high access to opportunity across a range of dimensions including school proficiency, environmental health, low poverty exposure, and labor market engagement. For transit-dependent residents of areas of relative racial and ethnic minority population concentration, such as the City of Taunton, the central portion of the City of Attleboro, and diverse cities outside of the Consortium like Providence, Pawtucket, Brockton, and New Bedford, these gaps can make moving to these high opportunity communities difficult. Second, even if communities within the Consortium that have bus service, headways are generally long, typically on the order of an hour, and hours are often limited. This can make accessing work that does not require advanced credentials but that may be better paying, including shift work, difficult for transit-dependent residents who are disproportionately Black and Hispanic. For example, in the City of Taunton, whereas 87.2% of all workers 18 years of age or older are non-Hispanic White, only 75.6% of those who commute to work using public transportation are non-Hispanic White. Lastly, unlike the communities at the eastern and western edges of the Consortium, including Attleboro and Middleborough, the City of Taunton, as the most heavily Black and Hispanic community within the Consortium as well as the area with the highest concentration of members of diverse national origin groups, has no commuter rail service. This disproportionately cuts off people of color living within the Consortium from job opportunities that offer the prospect of economic mobility in the Greater Boston area.

- Impediments to mobility

Impediments to mobility are a significant contributing factor to disparities in access to opportunity and the segregation of residents of publicly supported housing. In the Taunton-Mansfield-Norton, MA HUD Metro Fair Market Rent (FMR) Area, the Fiscal Year 2019 FMR for a two-bedroom unit is \$1,219. Units simply are not available at that price point within some predominantly non-Hispanic White, high opportunity areas within the Consortium like Norton. Small Area Fair Market Rents (SAFMRs) allow the rent ceiling to be set by zip code, rather than the larger metro area. By using SAFMRs, more expensive, high opportunity areas become more accessible to voucher holders because the rent ceiling is higher in that zip code. For example, in Zip Code 02766 in Norton, the SAFMR for a two-bedroom unit would be \$1,470. Within the Consortium, the overlay of areas of Housing Choice Voucher concentration with areas that have units available within metropolitan FMRs is significant. To the credit of the Taunton Housing Authority, the agency has set payment standards at 110% of the FMR in order to maximize access to opportunity within the parameters of metropolitan FMRs.

Another impediment to mobility within the Consortium is the fragmentation of public housing authorities. With at least ten housing authorities operating within the Consortium, including that of the State of Massachusetts, families with Housing Choice Vouchers may face delays in being able to access opportunity as a result of having to wait one year after receipt of their vouchers before moving to a high opportunity area through the exercise of their portability rights. If public housing authorities merged and had a unified service area, families would be able to access opportunity more quickly. The centralized wait list in which 43 public housing authorities in the region participate partially mitigates this impediment to mobility.

Although the policy of the Attleboro Housing Authority, among others, of not allowing families to port out during their first lease term is consistent with HUD regulations, an additional exception to that policy for families seeking to move to a high opportunity area in order to access, for example, highly proficient schools would be an improvement. Current policy allows families whose children are already attending distant schools to port out but not those currently attending schools with which they are dissatisfied.

Issues with respect to source of income discrimination and mobility counseling are discussed in connection with other contributing factors.

- Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is a significant contributing factor to disparities in access to opportunity and disproportionate housing needs in the Consortium as well as regionally. As discussed in connection with the impediments to mobility contributing factor, market rents in the highest opportunity parts of both the Consortium, the custom region, and the Providence-Warwick, RI-MA Metropolitan Statistical Area exceed HUD's metropolitan fair market rents (FMRs) for the Housing Choice Voucher program. As a result, in the absence of Small Area FMRs, voucher holders in the Consortium are concentrated in central Attleboro, Taunton, and Middleborough and do not have access to places with the most proficient schools, healthy neighborhoods, and high labor market engagement. Disproportionately Black and Hispanic low and moderate-income households that do not have access to rental assistance encounter the same difficulty. In addition to directly limiting access to opportunity, high housing costs have important secondary effects as, by limiting employment opportunity over the short and long-term, members of protected classes have lower incomes and thus experience disproportionate housing cost burden.

- Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods is discussed in more detail in the Segregation section. It is a contributing factor to Disparities in Access to Opportunity.

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

Lack of public investment in specific neighborhoods is discussed in more detail in the Segregation section. It is a significant contributing factor to Disparities in Access to Opportunity.

- Lack of local or regional cooperation

Lack of local or regional cooperation is discussed in more detail in the Segregation section. Lack of local or regional cooperation is a significant contributing factor to disparities in access to opportunity in the Consortium as well as regionally.

- Land use and zoning laws

Land use and zoning is discussed in more detail in the Segregation section. It is a significant contributing factor to Disparities in Access to Opportunity.

- Lending discrimination

Lending discrimination is discussed in more detail in the Segregation section. Lending discrimination is a significant contributing factor to segregation, disparities in access to opportunity, and disproportionate housing needs in the Consortium and those fair housing issues along with R/ECAPs in the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area.

- Location and type of affordable housing

The location and type of affordable housing is discussed in more detail in the Segregation section. It is a significant contributing factor to segregation and disparities in access to opportunity for residents of publicly supported housing in the City of Taunton, the Consortium, the custom region, and the Providence-Warwick, RI-MA.

- Location of employers

The location of employers is not a significant contributing factor to disparities in access to opportunity within the Consortium, the Cities of Taunton and Attleboro, the custom region, and the Providence-Warwick, RI-MA Metropolitan Statistical Area. Within the Consortium, Taunton, with its significant industrial park, is simultaneously the major job center and an area of relative Black and Hispanic population concentration. In the parts of both defined regions that lie outside of the Consortium, major job centers include the City of Providence and the Route 128 Corridor in the suburbs of Boston. In the former case, the area is also disproportionately Black and Hispanic in relation to the Providence-Warwick, RI-MA Metropolitan Statistical Area as a whole. In the latter case, the area is relatively well served by transit to allow connectivity to other parts of the custom region.

- Location of environmental health hazards

Location of environmental health hazards is not a significant contributing factor to Disparities in Access to Opportunity. According to the HUD data and mapping tool, the Environmental Health Index rates the areas in the Taunton Consortium as very good. The majority of the census tracts rank in the 80s and 90s on the scale (higher numbers are better), but scores are slightly worse in

heavily populated areas (40s-60s) such as Attleboro and Taunton, probably due to higher populations and an influx of cars.

The Taunton consortium has two active superfund sites on the National Priorities List. The Walton and Lonsbury site is located at 78 North Ave in Attleboro, about midway between the Attleboro and North Attleboro town centers. The Shpack Landfill is located on Union Rd and spans several acres in both Norton and Attleboro, but is located about midway between the Attleboro and Norton town centers.

According to homefacts.com, the following chart details other indicators of environmental health, including superfund sites, brownfields, known polluters, and tanks and spills. Overall, the environmental health (location of hazards) seems to be very good.

City/Town	Superfund sites (Active, NPL)	Brownfields	Polluters	Tanks and Spills
Attleboro	1	1	38	278
Berkley	0	0	0	25
Carver	0	2	1	41
Dighton	0	0	1	26
Lakeville	0	0	1	43
Mansfield	0	5	11	103
Middleboro	0	0	0	0
North Attleboro	0	0	5	122
Norton	1	0	5	63
Plainville	0	1	3	46
Raynham	0	0	2	88
Seekonk	0	1	0	119
Taunton	0	29	19	299
Total:	2	39	86	1,253

- Location of proficient schools and school assignment policies

The location of proficient schools and school assignment policies are contributing factors to disparities in access to proficient schools in the Consortium, the custom region, and the Providence-Warwick, RI-MA Metropolitan Statistical Area. The Commonwealth of Massachusetts has an Inter-District School Choice program, but the decision as to whether to participate and how many seats to make available to inter-district transferees on a yearly basis is left up to the receiving school district. Within the Consortium, the Attleboro, Mansfield, North Attleboro, Plainville, and Seekonk districts currently do not allow for inter-district transfers while the districts for Berkley, Carver, Dighton-Rehoboth, Freetown-Lakeville, Middleborough, Norton, Bridgewater-Raynham, and Taunton do allow for transfers. The former set of school

districts disproportionately include some of the parts of the Consortium with the most proficient schools. If these districts began to accept transfers through the Inter-District School Choice program, that would increase access to proficient schools within the Consortium as well as regionally. It would not be a panacea for disparities in access to proficient schools for Black and Hispanic students as gaps in public transportation in high opportunity areas would still make it difficult for the Inter-District School Choice program to have its intended effect. Nonetheless, it would be a step forward. By contrast, within individual school districts, since many school districts are small and have very few schools, there do not appear to be significant disparities based on the precise location of schools within districts and attendance zones within districts. Inter-district inequity is the more pressing issue.

- Loss of Affordable Housing

Loss of affordable housing is discussed in more detail in the Segregation section. Loss of affordable housing is a significant contributing factor to Disparities in Access to Opportunity.

- Occupancy codes and restrictions

Occupancy codes and restrictions are discussed in more detail in the Segregation section. It is not a significant contributing factor to Disparities in Access to Opportunity.

- Private discrimination

Private discrimination is discussed in greater detail in the Segregation section. Private discrimination is not a significant contributing factor to Disparities in Access to Opportunity.

- Source of income discrimination

Source of income discrimination is discussed in greater detail in the Segregation section. Source of income discrimination is not a major contributing factor to Disparities in Access to Opportunity, since source of income discrimination is illegal.

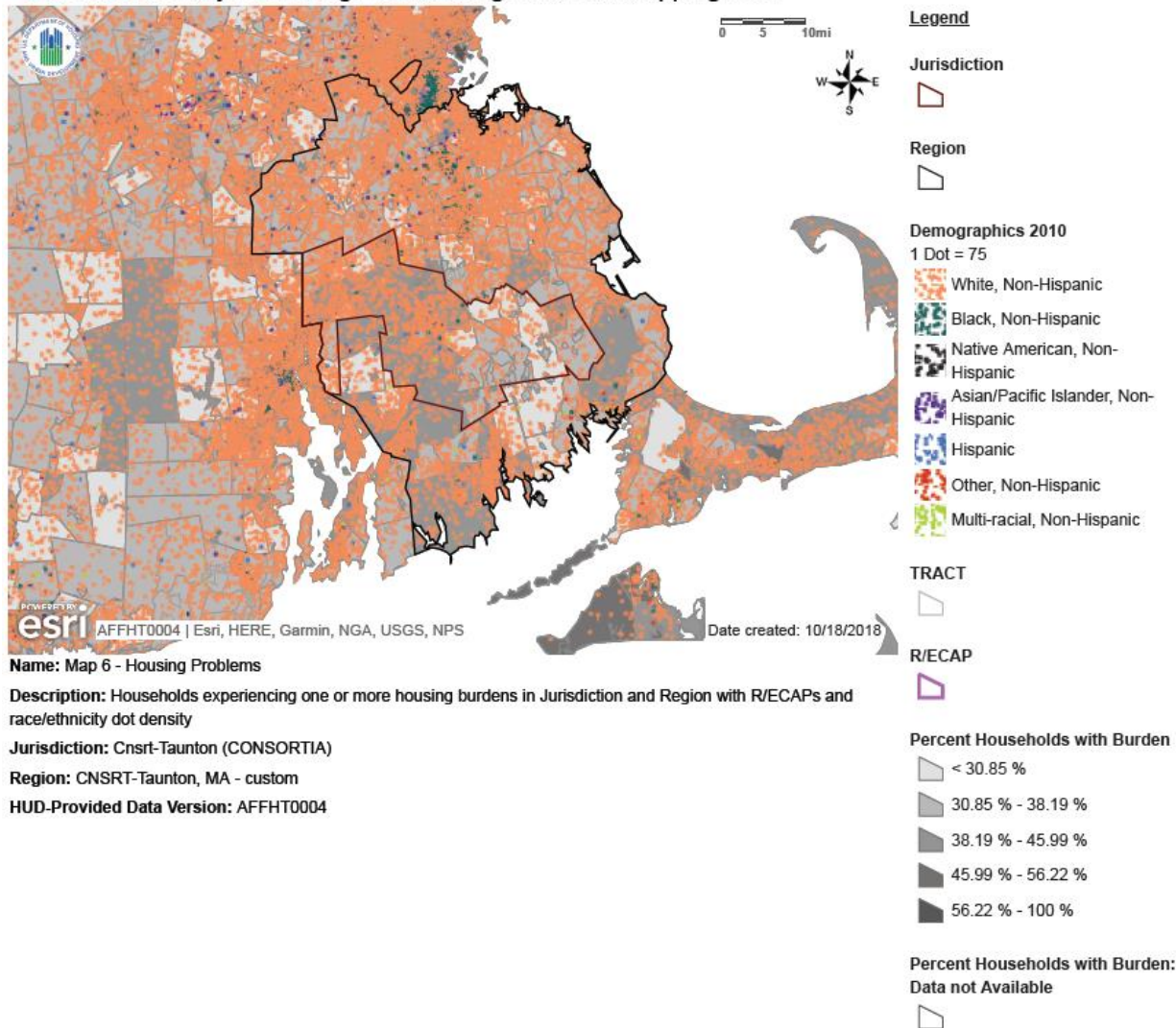
- Other

N/A

B. GENERAL ISSUES

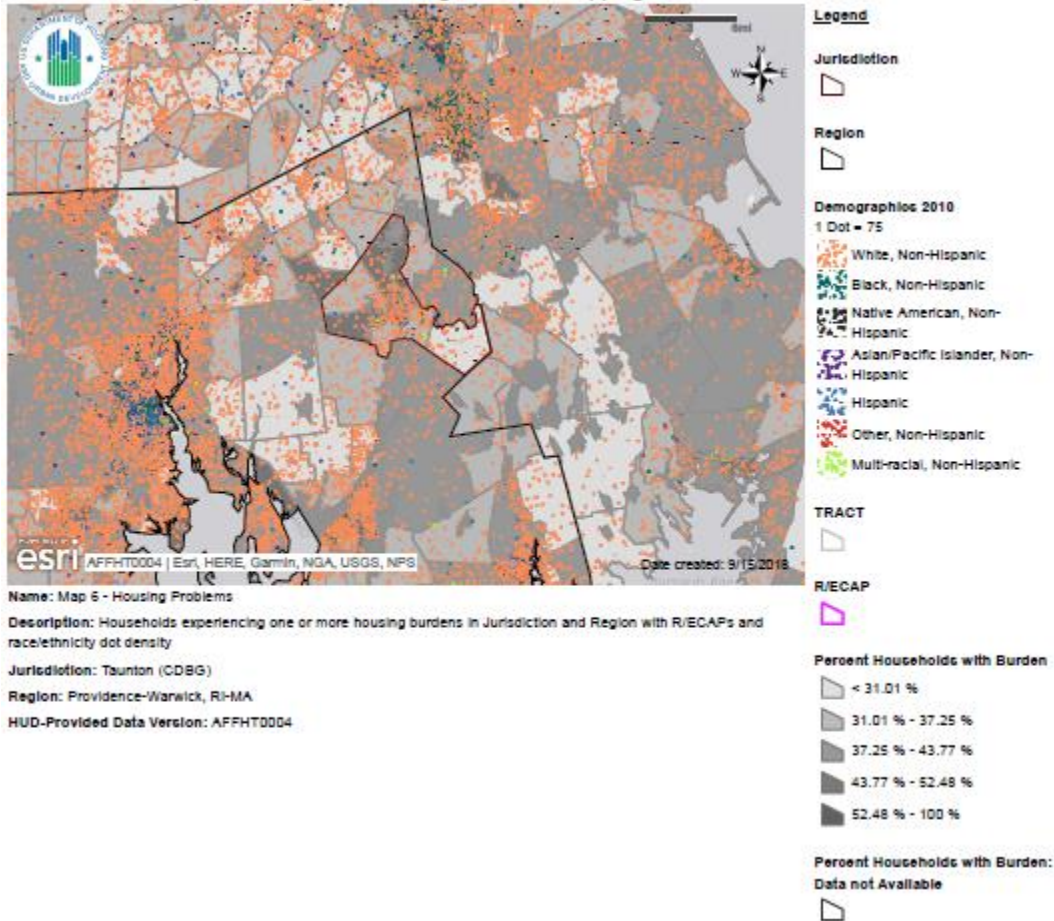
iv. Disproportionate Housing Needs

Map 1: Housing Problems, Taunton Consortium
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 2: Housing Problems by Race/Ethnicity, Taunton, MA

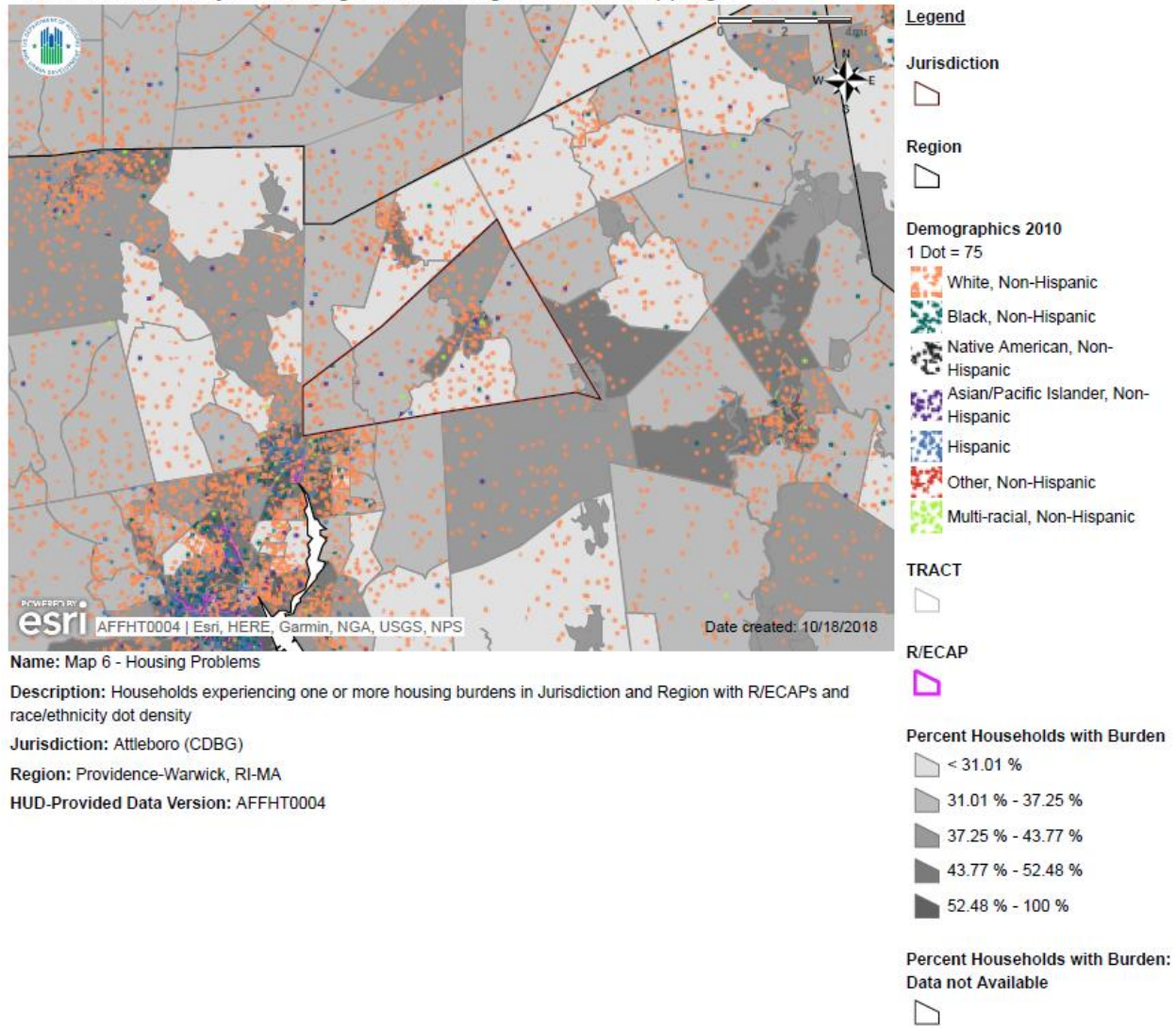
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



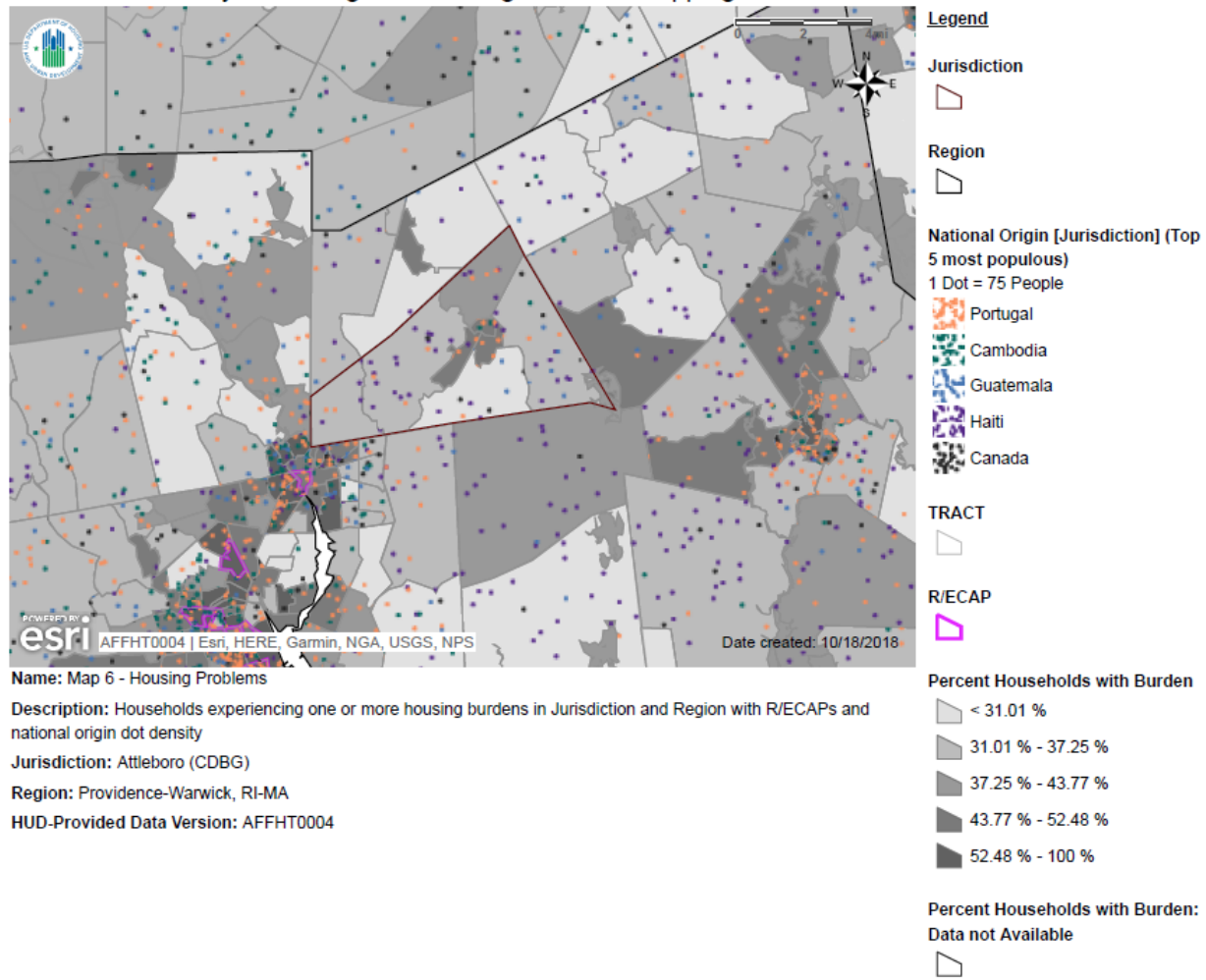
Map 3: Housing Problems by National Origin, Taunton, MA HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 4: Housing Problems by Race/Ethnicity, Attleboro, MA HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 5: Housing Problems by National Origin, Attleboro, MA
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



1. Analysis

- Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?*

Table 9 - Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Taunton, MA CDBG) Jurisdiction			(Providence-Warwick, RI-MA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	7,385	19,005	38.86%	189,100	519,330	36.41%
Black, Non-Hispanic	580	1,010	57.43%	12,329	25,021	49.27%
Hispanic	655	995	65.83%	27,898	48,732	57.25%
Asian or Pacific Islander, Non-Hispanic	95	170	55.88%	5,588	12,445	44.90%
Native American, Non-Hispanic	25	29	86.21%	932	1,636	56.97%
Other, Non-Hispanic	220	443	49.66%	6,825	12,893	52.94%
Total	8,950	21,655	41.33%	242,710	620,095	39.14%
Household Type and Size						
Family households, <5 people	4,080	12,248	33.31%	114,600	348,685	32.87%
Family households, 5+ people	765	1,880	40.69%	20,000	46,774	42.76%
Non-family households	4,095	7,520	54.45%	108,095	224,620	48.12%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	3,510	19,005	18.47%	88,970	519,330	17.13%
Black, Non-Hispanic	335	1,010	33.17%	7,108	25,021	28.41%
Hispanic	470	995	47.24%	16,913	48,732	34.71%
Asian or Pacific Islander, Non-Hispanic	20	170	11.76%	3,260	12,445	26.20%
Native American, Non-Hispanic	25	29	86.21%	492	1,636	30.07%
Other, Non-Hispanic	134	443	30.25%	3,653	12,893	28.33%
Total	4,480	21,655	20.69%	120,425	620,095	19.42%
<p>Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.</p> <p>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</p> <p>Note 3: Data Sources: CHAS</p> <p>Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).</p>						

Table 9 - Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(CNSRT-Taunton, MA CONSORTIA) Jurisdiction			(CNSRT-Taunton, MA - custom) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	31,508	91,439	34.46%	195,670	557,050	35.13%
Black, Non-Hispanic	1,123	2,408	46.64%	16,395	31,534	51.99%
Hispanic	1,490	2,555	58.32%	11,365	21,405	53.10%
Asian or Pacific Islander, Non-Hispanic	752	1,825	41.21%	9,320	23,919	38.96%
Native American, Non-Hispanic	39	47	82.98%	274	552	49.64%
Other, Non-Hispanic	584	1,223	47.75%	5,725	12,625	45.35%
Total	35,505	99,545	35.67%	238,770	647,105	36.90%
Household Type and Size						
Family households, <5 people	18,383	60,830	30.22%	116,575	376,330	30.98%
Family households, 5+ people	3,457	9,845	35.11%	21,840	59,415	36.76%
Non-family households	13,664	28,854	47.36%	100,360	211,380	47.48%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	14,059	91,439	15.38%	89,230	557,050	16.02%
Black, Non-Hispanic	593	2,408	24.63%	8,570	31,534	27.18%
Hispanic	794	2,555	31.08%	6,145	21,405	28.71%
Asian or Pacific Islander, Non-Hispanic	393	1,825	21.53%	4,989	23,919	20.86%
Native American, Non-Hispanic	29	47	61.70%	134	552	24.28%
Other, Non-Hispanic	259	1,223	21.18%	3,019	12,625	23.91%
Total	16,110	99,545	16.18%	112,080	647,105	17.32%
<p>Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.</p> <p>Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.</p> <p>Note 3: Data Sources: CHAS</p> <p>Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).</p>						

Table 9 - Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Attleboro, MA CDBG) Jurisdiction			(Providence-Warwick, RI-MA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	5,000	14,359	34.82%	189,100	519,330	36.41%
Black, Non-Hispanic	224	499	44.89%	12,329	25,021	49.27%
Hispanic	470	830	56.63%	27,898	48,732	57.25%
Asian or Pacific Islander, Non-Hispanic	285	544	52.39%	5,588	12,445	44.90%
Native American, Non-Hispanic	4	8	50.00%	932	1,636	56.97%
Other, Non-Hispanic	70	175	40.00%	6,825	12,893	52.94%
Total	6,050	16,400	36.89%	242,710	620,095	39.14%
Household Type and Size						
Family households, <5 people	3,210	9,740	32.96%	114,600	348,685	32.87%
Family households, 5+ people	640	1,450	44.14%	20,000	46,774	42.76%
Non-family households	2,205	5,220	42.24%	108,095	224,620	48.12%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	2,435	14,359	16.96%	88,970	519,330	17.13%
Black, Non-Hispanic	49	499	9.82%	7,108	25,021	28.41%
Hispanic	134	830	16.14%	16,913	48,732	34.71%
Asian or Pacific Islander, Non-Hispanic	134	544	24.63%	3,260	12,445	26.20%
Native American, Non-Hispanic	4	8	50.00%	492	1,636	30.07%
Other, Non-Hispanic	0	175	0.00%	3,653	12,893	28.33%
Total	2,750	16,400	16.77%	120,425	620,095	19.42%
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: Data Sources: CHAS						
Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).						

In the Consortium, Hispanic households and non-family households face the highest incidence of housing problems among groups for which there is a significant population, followed by Black households and large families with five or more members. White households and small families encounter the lowest rates of housing problems. This pattern of racial and ethnic disparity holds true for severe housing problems, as well. In the City of Taunton, the same exact patterns are in evidence. In the City of Attleboro, the same dynamics are in evidence with respect to household size and type. As regards race and ethnicity, the same patterns are present with respect to housing problems but not severe housing problems. Hispanics in Attleboro face severe housing problems at about the same rate as do Whites. Blacks in Attleboro actually have lower rates of severe housing problems though the sample size of Black residents in Attleboro is very small. The sample-based American Community Survey may not be reliable on this point. The same is true in the custom region for the Consortium with the caveat that, while Hispanic households still face more housing problems than Black households, the gap is narrower. In the Providence-Warwick, RI-MA Metropolitan Statistical Area, the applicable region for the City of Taunton, the trend is consistent, and the difference between the rates of housing problems for Hispanic and Black households is more similar to those of the Consortium and the City of Taunton than it is to that of the custom region.

Table 10 - Demographics of Households with Severe Housing Cost Burden						
Households with Severe Housing Cost Burden		(Taunton, MA CDBG) Jurisdiction			(Providence-Warwick, RI-MA) Region	
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	3,230	19,005	17.00%	81,600	519,330	15.71%
Black, Non-Hispanic	250	1,010	24.75%	6,140	25,021	24.54%
Hispanic	310	995	31.16%	14,055	48,732	28.84%
Asian or Pacific Islander, Non-Hispanic	20	170	11.76%	2,643	12,445	21.24%
Native American, Non-Hispanic	25	29	86.21%	440	1,636	26.89%
Other, Non-Hispanic	120	443	27.09%	3,250	12,893	25.21%
Total	3,955	21,655	18.26%	108,128	620,095	17.44%
Household Type and Size						
Family households, <5 people	1,990	12,248	16.25%	48,098	348,685	13.79%
Family households, 5+ people	115	1,880	6.12%	5,655	46,774	12.09%
Non-family households	1,850	7,520	24.60%	54,380	224,620	24.21%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/afth-data-documentation).

Table 10 - Demographics of Households with Severe Housing Cost Burden						
Households with Severe Housing Cost Burden		(CNSRT-Taunton, MA CONSORTIA) Jurisdiction			(CNSRT-Taunton, MA - custom) Region	
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	12,805	91,439	14.00%	83,010	557,050	14.90%
Black, Non-Hispanic	468	2,408	19.44%	7,525	31,534	23.86%
Hispanic	545	2,555	21.33%	5,275	21,405	24.64%
Asian or Pacific Islander, Non-Hispanic	359	1,825	19.67%	3,830	23,919	16.01%
Native American, Non-Hispanic	29	47	61.70%	140	552	25.36%
Other, Non-Hispanic	227	1,223	18.56%	2,615	12,625	20.71%
Total	14,433	99,545	14.50%	102,395	647,105	15.82%
Household Type and Size						
Family households, <5 people	7,170	60,830	11.79%	47,453	376,330	12.61%
Family households, 5+ people	673	9,845	6.84%	5,740	59,415	9.66%
Non-family households	6,595	28,854	22.86%	49,220	211,380	23.29%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/afth-data-documentation).

Table 10 - Demographics of Households with Severe Housing Cost Burden						
Households with Severe Housing Cost Burden		(Attleboro, MA CDBG) Jurisdiction			(Providence-Warwick, RI-MA) Region	
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	2,150	14,359	14.97%	81,600	519,330	15.71%
Black, Non-Hispanic	24	499	4.81%	6,140	25,021	24.54%
Hispanic	75	830	9.04%	14,055	48,732	28.84%
Asian or Pacific Islander, Non-Hispanic	110	544	20.22%	2,643	12,445	21.24%
Native American, Non-Hispanic	4	8	50.00%	440	1,636	26.89%
Other, Non-Hispanic	0	175	0.00%	3,250	12,893	25.21%
Total	2,363	16,400	14.41%	108,128	620,095	17.44%
Household Type and Size						
Family households, <5 people	1,255	9,740	12.89%	48,098	348,685	13.79%
Family households, 5+ people	110	1,450	7.59%	5,655	46,774	12.09%
Non-family households	994	5,220	19.04%	54,380	224,620	24.21%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/afth-data-documentation).

The same patterns described above are also present when evaluating severe housing cost burden as opposed to housing problems more generally. This is true for the Consortium, the City of Taunton, and both defined regions. The one qualification to this is that the disparity for non-family households is even more stark, likely because overcrowding rather than cost burden is the primary driver of housing problems for large families. In the City of Attleboro, however, White residents have higher rates of severe housing cost burden than do Blacks and Hispanics. The data with respect to familial status in Attleboro mirrors that of the other geographies.

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

Within the Consortium, housing problems are the most intense in the central portion of the City of Taunton, in the central and southern portions of the City of Attleboro, and in the eastern portion of the Town of North Attleboro. Within Taunton, areas with high levels of housing problems are slightly more heavily Black and Hispanic than the entire city and the Consortium as a whole. Within Attleboro, the areas with high levels of housing problems that are further west reflect the broader, predominantly White demographics of the Consortium while those to the east have substantially higher concentrations of Hispanic and Asian American residents than either the City of Attleboro or the Consortium as a whole. The portion of North Attleboro with high levels of housing problems is predominantly White. The portion of Taunton with high levels of housing problems has high concentrations of individuals of Portuguese and Azorean national origin, but the areas within Attleboro and North Attleboro with high levels of housing problems do not have apparent national origin concentrations. This may, however, be a reflection of the fact that the HUD AFFH-T Data & Mapping Tool only depicts the five most populous national origin groups within a program participant's jurisdiction.

For the Consortium, those are Portugal, the Azores, India, Canada, and Brazil. In the areas of Hispanic and Asian American population concentration in southeastern Attleboro, it is likely that other national origin groups are present. Although the largest share of Hispanic residents in Attleboro is Puerto Rican, a majority of foreign-born Hispanic residents come from Central America and in particular the countries of Guatemala, El Salvador, and Honduras. It is likely that there are concentrations of individuals with these national origins in southeastern Attleboro. By contrast, for the Asian national origin groups present in Attleboro, there is less evidence of a pattern of concentration in that area.

In the broader regions, including both the custom region for the Consortium and the Providence-Warwick, RI-MA region, areas with high levels of housing problems include the western portion of the City of New Bedford, the central portion of the City of Fall River, the City of Brockton, the City of Pawtucket, and the southwestern portion of the City of Providence. Western New Bedford has high concentrations of Black and Hispanic residents in comparison to the broader region, central Fall River has slight but not significant concentrations, Brockton has very high concentrations of Black residents, Pawtucket has high concentrations of both Black and Hispanic residents, and southwestern Providence has very high concentrations of Hispanic residents. Western New Bedford has concentrations of people of Portuguese, Cape Verdean, and Guatemalan national origin; central Fall River has concentrations of people of Portuguese and Azorean national origin; Brockton has concentrations of people of Haitian national origin; Pawtucket has concentrations of people of Cape Verdean and Guatemalan national origin; and southwestern Providence has concentrations of Dominican and Guatemalan national origin. There are very few if any areas with high levels of housing problems in the region that are also areas with disproportionately White populations.

- 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 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children									
	(CNSRT-Taunton, MA CONSORTIA) Jurisdiction								
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children		
Housing Type	#	%	#	%	#	%	#		
Public Housing	405	84.91%	50	10.48%	18	3.77%	44	9.22%	
Project-Based Section 8	540	69.95%	183	23.70%	44	5.70%	134	17.36%	
Other Multifamily	0	0.00%	0	0.00%	0	0.00%	N/a	N/a	
HCV Program	551	26.05%	806	38.11%	705	33.33%	948	44.82%	
Note 1: Data Sources: APSH									
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).									

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children									
	(Taunton, MA CDBG) Jurisdiction								
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children		
Housing Type	#	%	#	%	#	%	#	%	
Public Housing	405	84.91%	50	10.48%	18	3.77%	44		9.22%
Project-Based Section 8	126	65.97%	40	20.94%	23	12.04%	31		16.23%
Other Multifamily	0	0.00%	0	0.00%	0	0.00%	N/a		N/a
HCV Program	308	23.97%	480	37.35%	481	37.43%	614		47.78%
Note 1: Data Sources: APSH									
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).									

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children									
	(Attleboro, MA CDBG) Jurisdiction								
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children		
Housing Type	#	%	#	%	#	%	#	%	
Public Housing	0	0.00%	0	0.00%	0	0.00%	N/a		N/a
Project-Based Section 8	285	94.06%	17	5.61%	0	0.00%	1		0.33%
Other Multifamily	0	0.00%	0	0.00%	0	0.00%	N/a		N/a
HCV Program	47	29.38%	58	36.25%	51	31.88%	57		35.63%
Note 1: Data Sources: APSH									
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).									

In City of Taunton, the City of Attleboro, and the Consortium, a large majority of public housing and Project-Based Section 8 units reflected in the HUD AFFH-T Data & Mapping Tool are in senior developments that consist primarily of studio and one-bedroom units. Very few affordable units for large families appear to be available through these two programs. However, the tool does not reflect the demographics of Bristol Commons and Lenox Green, Taunton's two most significant family-occupancy public housing developments. Lenox Green consists of a mix of one, two, and three-bedroom apartments, while Bristol Commons features one, two, three, and four-bedroom apartments. The presence of family occupancy housing in large units at those sites, notwithstanding, a much larger share of low-income families with children in Taunton, in Attleboro, and in the Consortium utilize Housing Choice Vouchers to secure larger units. Table 9 would seem to suggest a relatively limited need for more publicly supported housing for small families with children, such as those with two to four members; however, undoubtedly, low-income households of that size face housing problems. At the same time, larger families, such as those that would occupy four-bedroom units, appear to face higher levels of unmet need.

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

	(CNSRT-Taunton, MA CONSORTIA) Jurisdiction				(CNSRT-Taunton, MA - custom) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	70,335	94.54%	21,130	84.03%	407,575	90.72%	149,495	75.57%
Black, Non-Hispanic	1,090	1.47%	1,315	5.23%	13,445	2.99%	18,085	9.14%
Hispanic	990	1.33%	1,545	6.14%	7,575	1.69%	13,820	6.99%
Asian or Pacific Islander, Non-Hispanic	1,260	1.69%	580	2.31%	14,630	3.26%	9,280	4.69%
Native American, Non-Hispanic	34	0.05%	14	0.06%	305	0.07%	265	0.13%
Other, Non-Hispanic	688	0.92%	554	2.20%	5,755	1.28%	6,875	3.48%
Total Household Units	74,400	-	25,145	-	449,290	-	197,815	-

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

	(Taunton, MA CDBG) Jurisdiction				(Providence-Warwick, RI-MA) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	12,760	93.82%	6,250	77.59%	350,265	91.38%	169,075	71.40%
Black, Non-Hispanic	330	2.43%	675	8.38%	8,265	2.16%	16,765	7.08%
Hispanic	195	1.43%	805	9.99%	12,940	3.38%	35,795	15.12%
Asian or Pacific Islander, Non-Hispanic	115	0.85%	50	0.62%	6,100	1.59%	6,350	2.68%
Native American, Non-Hispanic	30	0.22%	0	0.00%	560	0.15%	1,080	0.46%
Other, Non-Hispanic	175	1.29%	270	3.35%	5,155	1.34%	7,745	3.27%
Total Household Units	13,600	-	8,055	-	383,300	-	236,795	-

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

	(Attleboro, MA CDBG) Jurisdiction				(Providence-Warwick, RI-MA) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	9,740	90.73%	4,615	81.47%	350,265	91.38%	169,075	71.40%
Black, Non-Hispanic	210	1.96%	290	5.12%	8,265	2.16%	16,765	7.08%
Hispanic	340	3.17%	480	8.47%	12,940	3.38%	35,795	15.12%
Asian or Pacific Islander, Non-Hispanic	325	3.03%	225	3.97%	6,100	1.59%	6,350	2.68%
Native American, Non-Hispanic	4	0.04%	4	0.07%	560	0.15%	1,080	0.46%
Other, Non-Hispanic	115	1.07%	55	0.97%	5,155	1.34%	7,745	3.27%
Total Household Units	10,735	-	5,665	-	383,300	-	236,795	-

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

In the Consortium, the City of Taunton, the City of Attleboro, and both defined regions, there are significant disparities in housing tenure by race and ethnicity. Both Black and Hispanic households make up 2.5 to 4.5 times as large of a share of renters at each geographic level as they do of homeowners. The disparity is particularly pronounced for Hispanic households in the City of Taunton and the Providence-Warwick, RI-MA Metropolitan Statistical Area. This is consistent with the greater representation of and segregation of Hispanics in nearby cities within Rhode Island compared to the larger Black populations in parts of the custom region such as Brockton. There is no consistent pattern with respect to housing tenure among Asian Americans across the relevant geographic areas. White households consistently have higher rates of homeownership.

2. Additional Information

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

As of the 2017 Point-in-Time Count for the Attleboro, Taunton/Bristol County Continuum of Care, there were 234 homeless individuals within the Continuum of Care, including 36 unsheltered homeless individuals. The Continuum of Care includes most of the Consortium but also includes some small communities that do not participate in the Consortium. Additionally, a few Consortium members – namely those not located within Bristol County – are in the neighboring Quincy, Brockton, Weymouth, Plymouth City and County Continuum of Care and the Massachusetts Balance of State Continuum of Care. Nearly two-thirds (65.4%) of homeless individuals are in households that include both adults and children though all unsheltered homeless individuals are not part of households including both adults and children. People of color appear to be significantly overrepresented in the homeless population. 15.0% of homeless individuals are Hispanic, as opposed to 7.0% of the population of Bristol County as of the 2012-2016 American Community Survey 5-Year Estimates. 35.9% of homeless individuals are Black, as opposed to 3.4% of the population of Bristol County. It is important to note that the Point-In-Time does not disaggregate race by ethnicity, so the percentage of homeless individuals who are Black includes Black Hispanic residents. In Bristol County, 5.5% of Hispanic residents identify as Black. If this proportion is imputed to the population of Black homeless individuals, then 33.9% of homeless individuals would be non-Hispanic Blacks, and the combined proportion of homeless individuals that are Black and/or Hispanic would be 48.9%. It is also worth noting that the Cities of Fall River and New Bedford, which have their own Continua of Care that are not reflected in this Point-in-Time County, are both more heavily Black and Hispanic than Bristol County as a whole. Clearly, there are significant racial and ethnic disparities in homelessness in the area.

People with disabilities and domestic violence survivors, who are disproportionately likely to be women, also make up significant shares of the homeless population within the Continuum of Care. 35 homeless individuals (15.0%) have severe psychiatric disabilities. 19 (8.1%) have substance abuse disorders. Lastly, 15 (6.4%) are domestic violence survivors.

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

Although housing costs in the Consortium, the City of Taunton, and the Region generally are not high in national or the broader regional context of places like Greater Boston, income growth has not kept up in a manner sufficient to prevent housing cost burden. Between the 2005-2009 American Community Survey 5-Year Estimates and the 2012-2016 American Community Survey 5-Year Estimates, median household income in Bristol County only increased by 6.4%. Between the 2006-2010 American Community Survey 5-Year Estimates and the 2012-2016 American Community Survey 5-Year Estimates, median household income in the City of Taunton only increased by 2.2%. Attleboro saw slightly stronger income growth of 7.9% between 2006-2010 and 2012-2016.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Availability of affordable units in a range of sizes

The availability of affordable units in a range of sizes does not appear to be a significant contributing factor to Disproportionate Housing Needs. According to the 2012-2016 5-year survey ACS data, overcrowding in the Consortium occurs in just 0.7% of cases for owner-occupied dwellings, and 2.6% for renters. In the 2010 Census, those rates were nearly identical, at 0.6% for owners and 2.8% for renters, so there does not seem to be a clear or recent trend toward un-crowding housing units.

However, when it comes to affordable housing units, the clear majority of Public Housing (84.91%) and Project-Based Section 8 (69.95%) units have only 0 or 1 bedrooms. Housing Choice Vouchers present a much more viable option for families with children, with the units very evenly distributed from 0-3+ bedrooms.

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
HCV Program	551	26.05%	806	38.11%	705	33.33%	948	44.82%

Housing Choice Voucher units also represent the clear plurality of households with children, with Project-Based Section 8 units in second place at only 17%.

However, despite not exhibiting signs of overcrowding, there is a lack of affordable units for low-income residents. On average, 14.5% of Consortium households have a severe housing cost burden, with Black households at 19.44%, Hispanic households at 21.33%, Asian or Pacific Islander households at 19.67% and Native Americans at a whopping 61.7% (statistic likely skewed by the very low number of Native Americans currently living in the area). With corresponding slow progress in the construction of new affordable housing, these concerns persist.

- Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is discussed in more detail in the Segregation section. It does not appear to be a significant contributing factor.

- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Massachusetts state law protects victims of domestic violence, rape, sexual assault, or stalking by allowing them to terminate their rental agreement or tenancy in any housing, public or private.¹¹⁸ The victim must provide written notification of the incident(s) within 3 months of the most recent act; or the tenant may vacate if they are reasonably in fear of imminent serious physical harm from domestic violence, rape, sexual assault, or stalking. The owner has the right to request proof of the victim's status, including the name of the perpetrator. Proof of status may be provided by a valid protection order, a record from a court or law enforcement of an act of domestic violence, rape, sexual assault, or stalking and the name of the perpetrator if known, or written verification from a qualified third party who received a report of the act (verification shall include the name of the organization, agency, clinic, or professional service provider and other relevant details).

The law also provides that the owner shall, upon request of the resident, change the locks of the unit where the resident lives if the resident reasonably believes that they are under imminent threat of domestic violence, rape, sexual assault, or stalking at the premises.¹¹⁹ The owner may request proof in the same form as stated above. The owner must make a good faith effort to change the locks and provide the new keys to the resident within two business days, and must not give the new keys to the perpetrator. The owner may charge a reasonable fee for changing the locks, and may be liable for damages for failure to provide the new keys to the resident or for taking action to prevent the locks from being changed.

Upon vacating the premises, any other housing provider shall not refuse to enter into a rental agreement based on the termination of the prior rental agreement or request to change the locks.¹²⁰ Nor shall a housing subsidy provider deny assistance to a victim based on the termination of the prior lease or request to change the locks.

- Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is discussed in more detail in the Disparities in Access to Opportunity section. It is a significant contributing factor to disparities in access to opportunity and disproportionate housing needs in the Consortium as well as regionally.

- Lack of private investments in specific neighborhoods

Lack of private investments in specific neighborhoods is discussed in more detail in the Segregation section. It is a contributing factor to disproportionate housing needs.

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

Lack of public investments in specific neighborhoods is discussed in more detail in the Segregation section. It is a contributing factor to disproportionate housing needs.

¹¹⁸ <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleI/Chapter186/Section24>

¹¹⁹ <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleI/Chapter186/Section26>

¹²⁰ <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleI/Chapter186/Section25>

- Land use and zoning laws

Land use and zoning laws are discussed in more detail in the Segregation section. They are not a significant contributing factor to disproportionate housing needs.

- Lending discrimination

Lending discrimination is discussed in more detail in the Segregation section. Lending discrimination is a significant contributing factor to segregation, disparities in access to opportunity, and disproportionate housing needs in the Consortium and those fair housing issues along with R/ECAPs in the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area.

- Loss of Affordable Housing

Loss of affordable housing is discussed in more detail in the Segregation section. It is a strong contributing factor to disproportionate housing needs.

- Source of income discrimination

Source of income discrimination is discussed in more detail in the Segregation section. It is not a significant contributing factor to Disproportionate Housing Needs.

- Other

N/A

V. FAIR HOUSING ANALYSIS

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

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

Table 6 - Publicly Supported Households by Race/Ethnicity									
	Race/Ethnicity								
(CNSRT-Taunton, MA CONSORTIA) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander		
Housing Type	#	%	#	%	#	%	#	%	
Public Housing	379	80.13%	49	10.36%	42	8.88%	0	0.00%	
Project-Based Section 8	657	86.90%	35	4.63%	51	6.75%	11	1.46%	
Other Multifamily	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a	
HCV Program	1,422	69.20%	306	14.89%	317	15.43%	7	0.34%	
Total Households	91,439	91.86%	2,408	2.42%	2,555	2.57%	1,825	1.83%	
0-30% of AMI	9,140	86.06%	294	2.77%	815	7.67%	115	1.08%	
0-50% of AMI	14,519	71.28%	543	2.67%	1,075	5.28%	329	1.62%	
0-80% of AMI	27,847	79.14%	1,138	3.23%	1,545	4.39%	604	1.72%	
(CNSRT-Taunton, MA - custom) Region	White		Black		Hispanic		Asian or Pacific Islander		
Housing Type	#	%	#	%	#	%	#	%	
Public Housing	3,599	47.24%	1,666	21.87%	1,837	24.11%	494	6.48%	
Project-Based Section 8	6,991	79.15%	918	10.39%	682	7.72%	196	2.22%	
Other Multifamily	230	80.14%	8	2.79%	5	1.74%	43	14.98%	
HCV Program	9,799	56.45%	4,992	28.76%	2,243	12.92%	255	1.47%	
Total Households	557,050	86.08%	31,534	4.87%	21,405	3.31%	23,919	3.70%	
0-30% of AMI	66,420	78.52%	6,244	7.38%	5,820	6.88%	3,435	4.06%	
0-50% of AMI	102,705	65.94%	11,139	7.15%	9,035	5.80%	5,545	3.56%	
0-80% of AMI	171,570	72.26%	16,659	7.02%	12,070	5.08%	7,835	3.30%	
Note 1: Data Sources: Decennial Census; APSH; CHAS									
Note 2: Numbers presented are numbers of households not individuals.									
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).									

Table 6 - Publicly Supported Households by Race/Ethnicity

	Race/Ethnicity							
(Taunton, MA CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	379	80.13%	49	10.36%	42	8.88%	0	0.00%
Project-Based Section 8	150	82.87%	13	7.18%	18	9.94%	0	0.00%
Other Multifamily	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
HCV Program	806	63.92%	205	16.26%	249	19.75%	1	0.08%
Total Households	19,005	87.76%	1,010	4.66%	995	4.59%	170	0.79%
0-30% of AMI	2,880	77.32%	180	4.83%	495	13.29%	40	1.07%
0-50% of AMI	4,535	68.40%	360	5.43%	675	10.18%	50	0.75%
0-80% of AMI	8,585	76.45%	630	5.61%	825	7.35%	95	0.85%
(Providence-Warwick, RI-MA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	4,296	41.73%	1,540	14.96%	4,240	41.19%	161	1.56%
Project-Based Section 8	7,558	59.88%	1,409	11.16%	3,422	27.11%	115	0.91%
Other Multifamily	374	67.15%	57	10.23%	115	20.65%	3	0.54%
HCV Program	7,797	51.75%	2,889	19.17%	4,138	27.46%	96	0.64%
Total Households	519,330	83.75%	25,021	4.04%	48,732	7.86%	12,445	2.01%
0-30% of AMI	63,145	69.23%	6,492	7.12%	15,810	17.33%	2,169	2.38%
0-50% of AMI	101,570	61.24%	10,287	6.20%	24,623	14.85%	3,643	2.20%
0-80% of AMI	177,810	68.17%	14,956	5.73%	34,173	13.10%	5,496	2.11%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: Numbers presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								

Table 6 - Publicly Supported Households by Race/Ethnicity

	Race/Ethnicity							
(Attleboro, MA CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	265	87.75%	9	2.98%	22	7.28%	5	1.66%
Other Multifamily	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
HCV Program	106	72.11%	16	10.88%	21	14.29%	3	2.04%
Total Households	14,359	87.55%	499	3.04%	830	5.06%	544	3.32%
0-30% of AMI	1,574	87.20%	4	0.22%	200	11.08%	15	0.83%
0-50% of AMI	2,344	71.25%	34	1.03%	240	7.29%	75	2.28%
0-80% of AMI	4,189	73.95%	214	3.78%	430	7.59%	240	4.24%
(Providence-Warwick, RI-MA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	4,296	41.73%	1,540	14.96%	4,240	41.19%	161	1.56%
Project-Based Section 8	7,558	59.88%	1,409	11.16%	3,422	27.11%	115	0.91%
Other Multifamily	374	67.15%	57	10.23%	115	20.65%	3	0.54%
HCV Program	7,797	51.75%	2,889	19.17%	4,138	27.46%	96	0.64%
Total Households	519,330	83.75%	25,021	4.04%	48,732	7.86%	12,445	2.01%
0-30% of AMI	63,145	69.23%	6,492	7.12%	15,810	17.33%	2,169	2.38%
0-50% of AMI	101,570	61.24%	10,287	6.20%	24,623	14.85%	3,643	2.20%
0-80% of AMI	177,810	68.17%	14,956	5.73%	34,173	13.10%	5,496	2.11%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: Numbers presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								

Within the Consortium, White residents are more likely to live in public housing and Project-Based Section 8 while Black and Hispanic residents are more likely to utilize Housing Choice Vouchers to access housing. Asians and Pacific Islanders access publicly supported housing at very low rates across program types. The same pattern holds for the cities of both Taunton and Attleboro. There are no units of Other Multifamily housing within the Consortium.

- ii. *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.*

Within the custom region, the demographics of Project-Based Section 8 are relatively similar to those in the Consortium and the cities of Taunton and Attleboro. Both public housing residents and Housing Choice Voucher holders are more heavily Black than in the program participants' jurisdictions. The percentage of public housing residents that is Hispanic is roughly similar in the custom region to the jurisdictions. Unlike in the program participants' jurisdictions, there is Other Multifamily housing in the custom region, and its occupants largely mirror the predominantly White composition of Project-Based Section 8. It is likely that a substantial share of Other Multifamily housing consists of senior housing and supportive housing for persons with disabilities. Unlike at the jurisdiction level, there is disproportionately high Asian and Pacific Islander residency in public housing and, in particular, Other Multifamily housing in the custom region.

In the Providence-Warwick, RI-MA Metropolitan Statistical Area, Hispanic representation among publicly supported housing residents is generally higher across categories with Black representation somewhat lower. The difference between the two regions may largely be explained by the inclusion of racially and socioeconomically diverse cities with large Hispanic populations, like Providence and Pawtucket, in the Providence-Warwick, RI-MA Metropolitan Statistical Area but not in the custom region and the inclusion of more heavily Black Brockton in the custom region but not in the Providence-Warwick, RI-MA Metropolitan Statistical Area. The percentage of White residents is lower across types of publicly supported housing with the difference being most significant for the two types of publicly supported housing that tend to have the most heavily White residents, Project-Based Section 8 and Other Multi-Family. Asian and Pacific Islander occupancy of publicly supported housing is low across the board in the Providence-Warwick, RI-MA Metropolitan Statistical Area.

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

In the program participants' jurisdictions, Black and Hispanic income-eligible residents are slightly underrepresented in public housing and Project-Based Section 8 and slightly overrepresented among Housing Choice Voucher holders. Asian and Pacific Islander income-

eligible residents are slightly underrepresented. Income-eligible Whites are slightly overrepresented among residents of public housing and Project-Based Section 8 and slightly underrepresented among Housing Choice Voucher holders, the precise inverse of the situation for Black and Hispanic residents.

In the custom region, income-eligible Whites are overrepresented in Project-Based Section 8 and Other Multifamily housing and underrepresented in public housing and among Housing Choice Voucher holders. Income-eligible Black and Hispanic households are overrepresented in each category except for Other Multifamily housing. Income-eligible Asian and Pacific Islander households are overrepresented in public housing and Other Multifamily housing but underrepresented in Project-Based Section 8 and among Housing Choice Voucher holders. In the Providence-Warwick, RI-MA Metropolitan Statistical Area, income-eligible Black and Hispanic households are overrepresented in every category of publicly supported housing and income-eligible White and Asian and Pacific Islander households are underrepresented in every category. The disparities are most significant for public housing and the Housing Choice Voucher program and least significant for Other Multifamily housing and Project-Based Section 8.

b. Publicly Supported Housing Location and Occupancy

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

Table 5 - Publicly Supported Housing Units by Program Category		
	(CNSRT-Taunton, MA CONSORTIA) Jurisdiction	
Housing Units	#	%
Total housing units	108,741	-
Public Housing	506	0.47%
Project-based Section 8	794	0.73%
Other Multifamily	8	0.01%
HCV Program	2,227	2.05%
Note 1: Data Sources: Decennial Census; APSH		
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).		

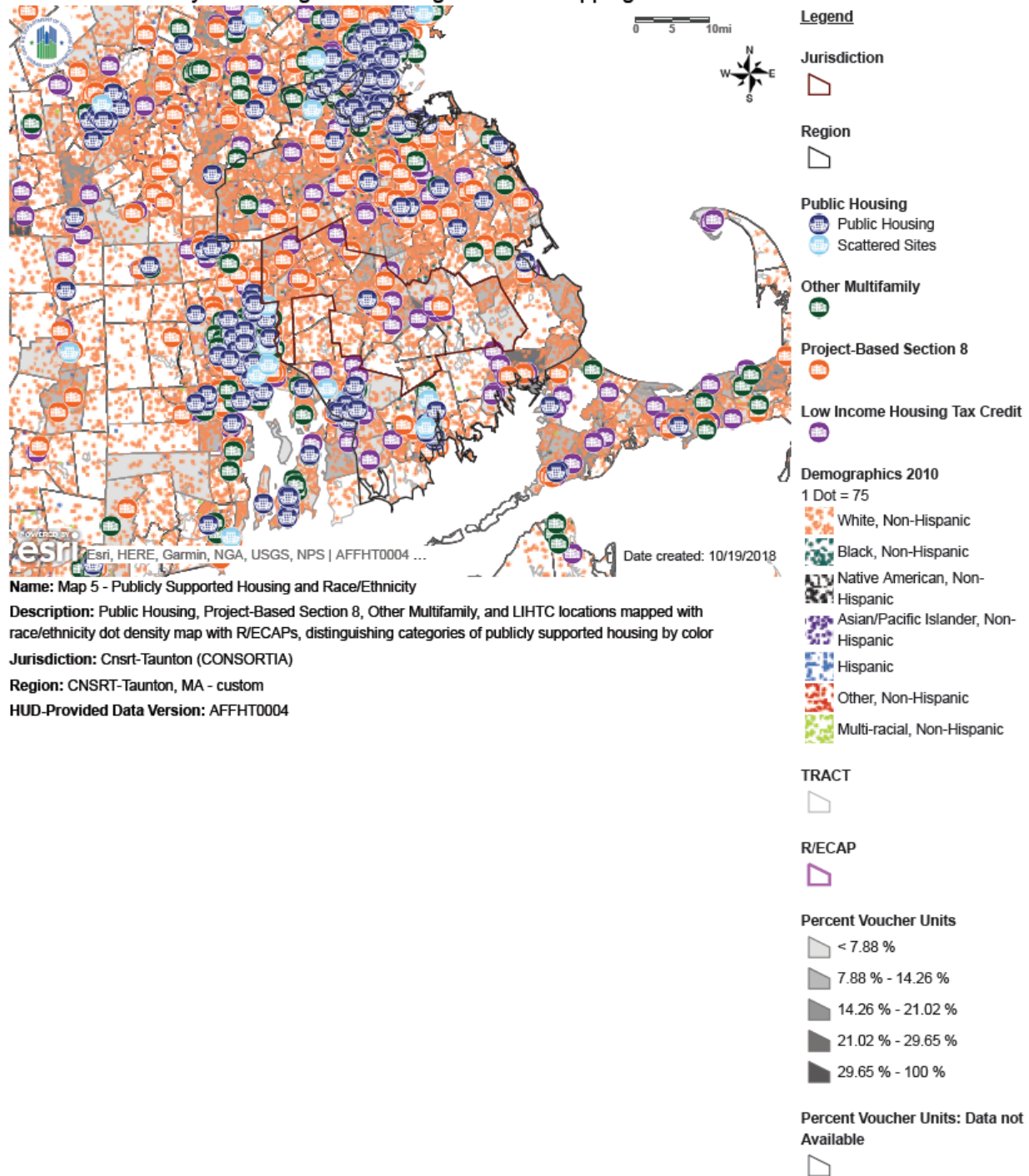
Table 5 - Publicly Supported Housing Units by Program Category

	(Taunton, MA CDBG) Jurisdiction	
Housing Units	#	%
Total housing units	23,896	-
Public Housing	506	2.12%
Project-based Section 8	195	0.82%
Other Multifamily	8	0.03%
HCV Program	1,372	5.74%

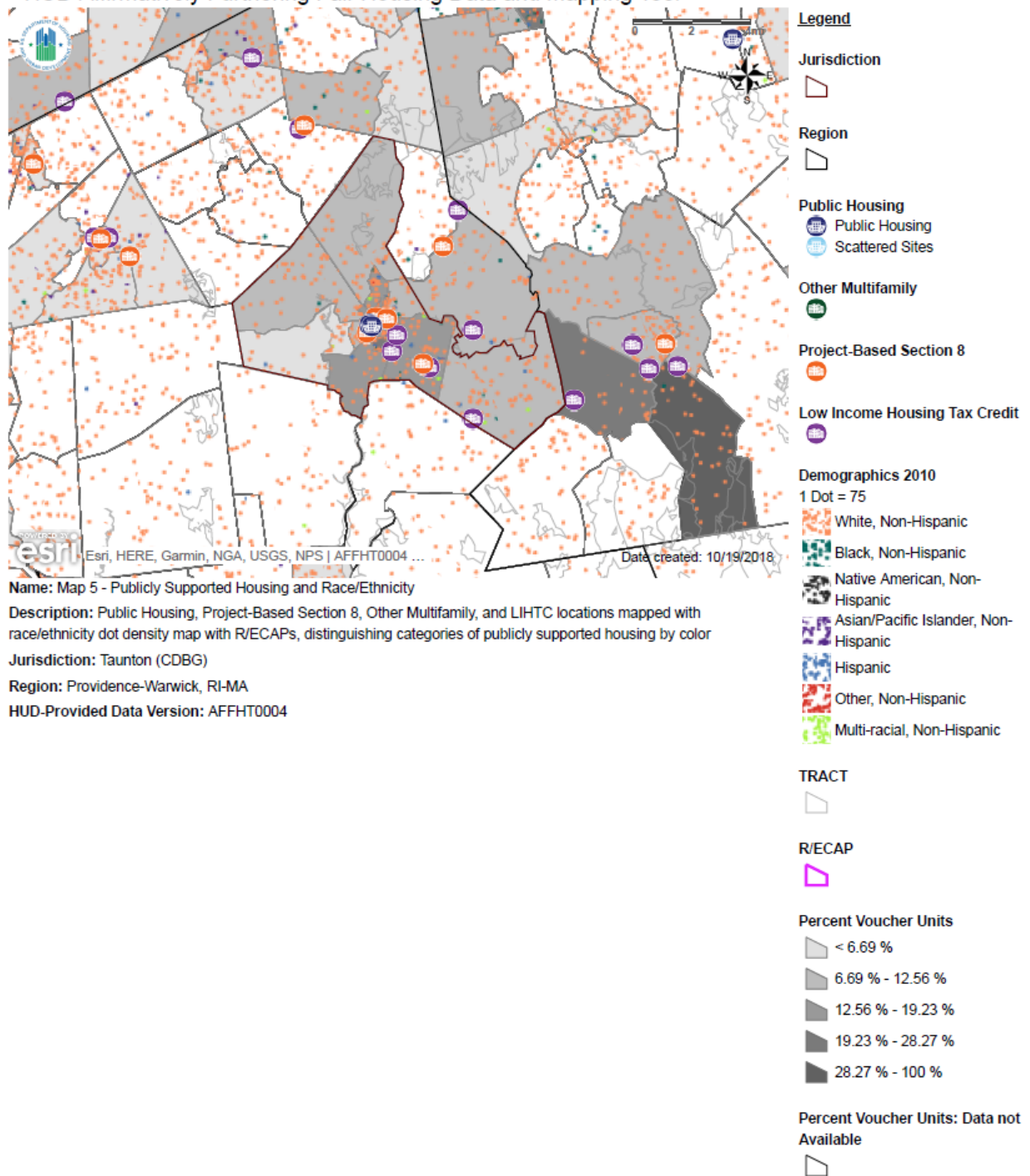
Note 1: Data Sources: Decennial Census; APSH

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

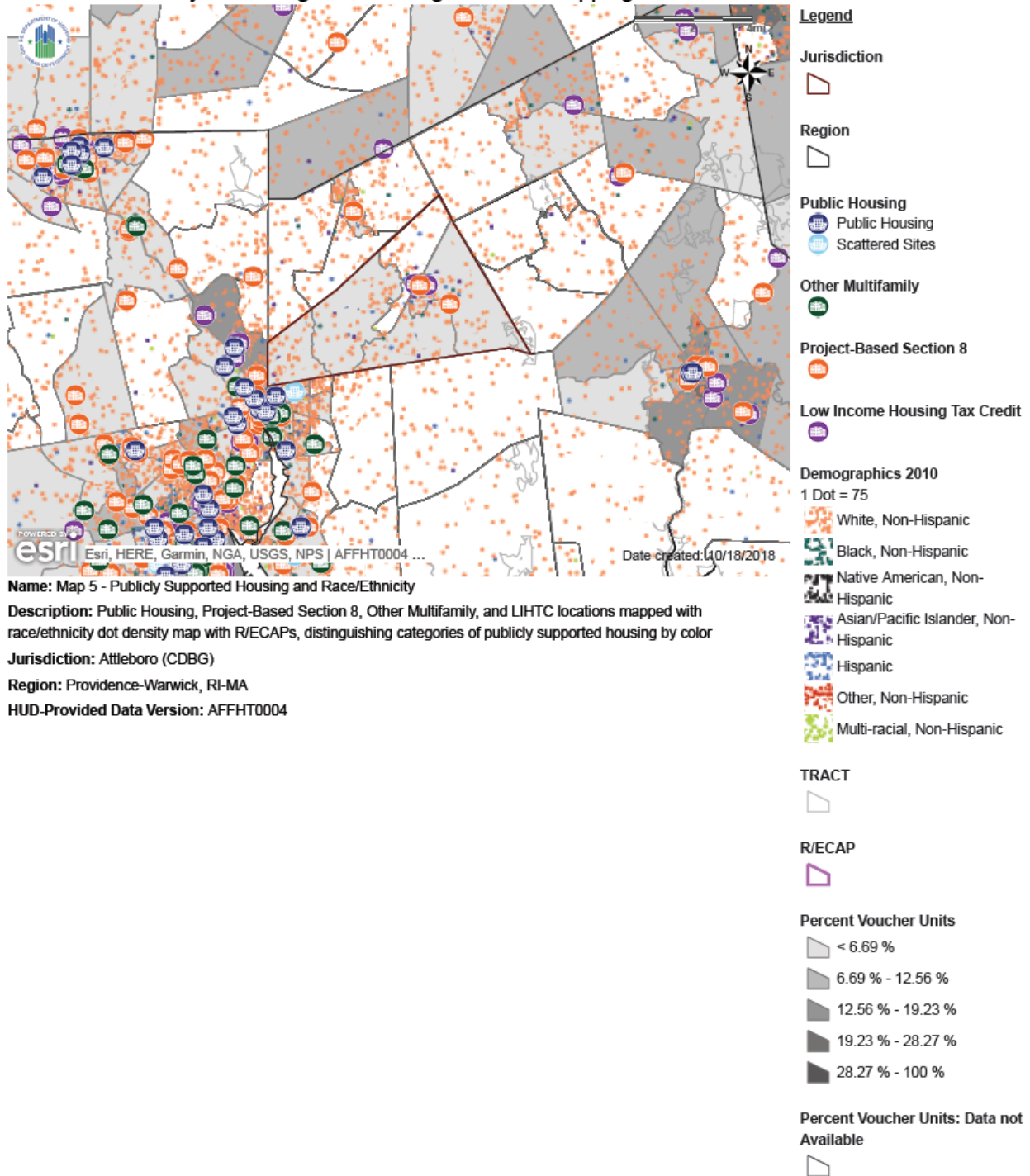
Map 1: Publicly Supported Housing by Race/Ethnicity, Taunton Consortium HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



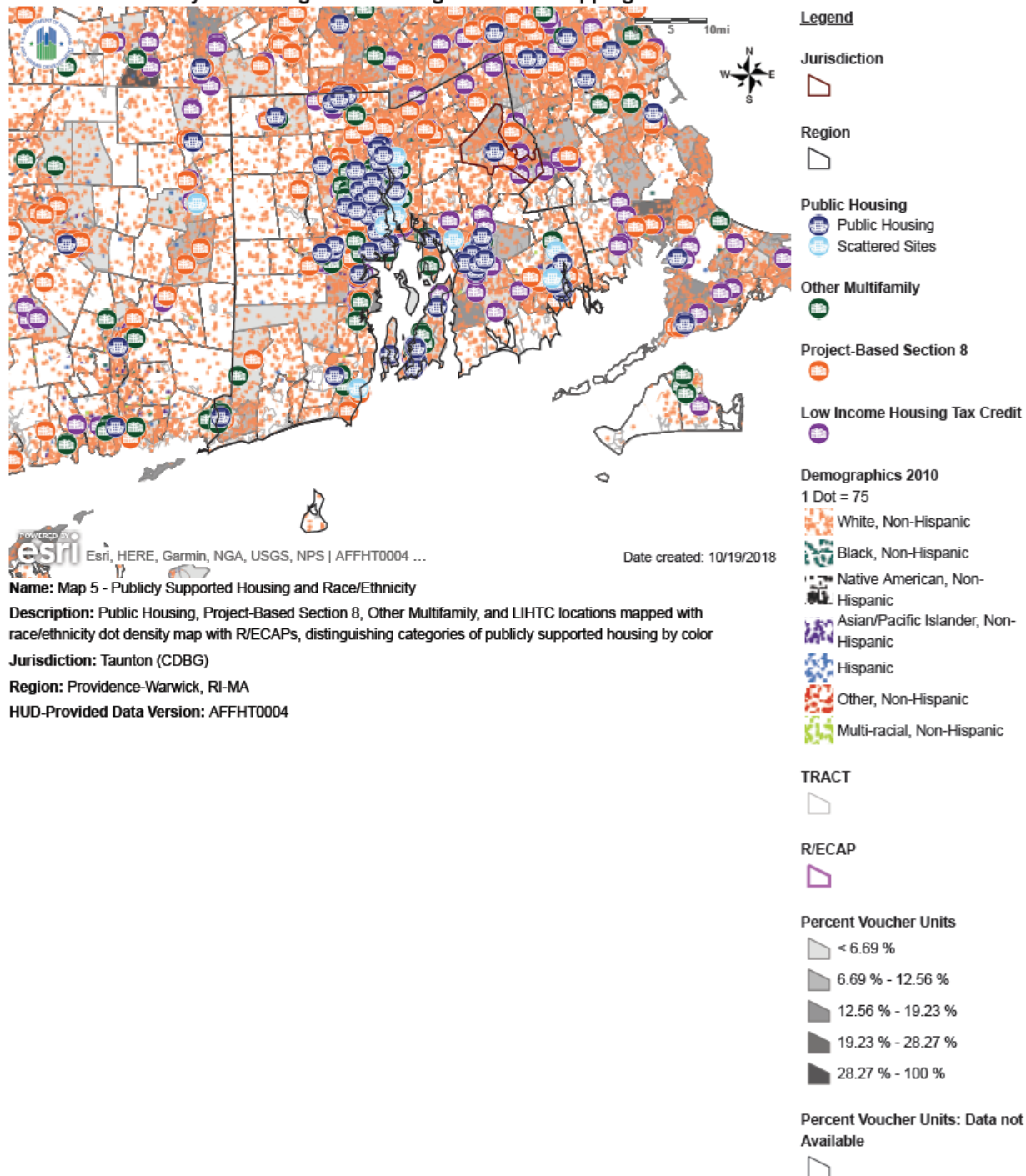
Map 2: Publicly Supported Housing by Race/Ethnicity, Taunton, MA
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 3: Publicly Supported Housing by Race/Ethnicity, Attleboro, MA
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 4: Publicly Supported Housing by Race/Ethnicity, Providence-Warwick, RI-MA Region
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Consistent with the relative lack of areas of racial and ethnic minority population concentration in the Consortium and the cities of Taunton and Attleboro, including the total lack of R/ECAPs, publicly supported housing is not concentrated in segregated areas in the program participants' jurisdictions. To the extent that there are areas of relative concentration, such as 29.1% Hispanic Census Tract in Attleboro, those areas do not have higher concentrations of

publicly supported housing than do other portions of the respective cities. It is worth noting that publicly supported housing within the Consortium is relatively concentrated in the cities of Taunton and Attleboro and the town of Middleborough. The former two of these municipalities are slightly though not substantially more heavily Black and Hispanic than the Consortium as a whole. Middleborough, by contrast, is more heavily non-Hispanic White than the Consortium as a whole. Because there is such little publicly supported housing in the program participants' jurisdictions, it is not possible to draw strong conclusions about the relative location of the different types of publicly supported housing.

In both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, by contrast, clear patterns of the segregation of publicly supported housing are in evidence. In the custom region, there are concentrations of publicly supported housing in the cities of Brockton, Fall River, and New Bedford, and Randolph, all areas with Black and Hispanic population concentrations that are high relative to the region as a whole. This pattern of concentration holds across all publicly supported housing categories but is more intense for public housing, Project-Based Section 8, and Housing Choice Vouchers than it is for Other Multifamily and Low-Income Housing Tax Credit housing. In the Providence-Warwick, RI-MA Metropolitan Statistical Area, there are concentrations of all types of publicly supported housing in Pawtucket and in the north-central and southwestern portions of the City of Providence, all areas with higher Black and Hispanic population concentrations than the region as a whole. As in the custom region, Other Multifamily housing is somewhat more widely dispersed.

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

As discussed above, there are no significant noticeable patterns of concentration of publicly supported housing within the Consortium and the cities of Taunton and Attleboro. There are also very few hard units of family-occupancy publicly supported housing. That housing is similarly broadly distributed to housing for elderly persons and persons with disabilities.

Within the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, however, housing for elderly persons and persons with disabilities is more widely scattered and is less likely to be in R/ECAPs than housing for families with children. This is consistent with the pattern discussed above of Other Multifamily housing being less segregated. Two of the largest housing programs that comprise the Other Multifamily category are Section 811, which subsidizes supportive housing for persons with disabilities, and Section 202, which subsidizes supportive housing for elderly persons. At the same time, the fact that Project-Based Section 8, which also includes many senior developments, is just as segregated in heavily Black and Hispanic areas as public housing and Housing Choice Voucher holders slightly undercuts this overarching trend.

- iii. *How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?*

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(CNSRT-Taunton, MA CONSORTIA) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	435	83.80%	8.45%	7.04%	0.00%	1.63%	69.07%	34.19%
Project-based Section 8								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	737	87.23%	4.76%	6.25%	1.49%	15.31%	62.85%	24.50%
Other Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	0.00%	N/a
HCV Program								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	2,056	69.38%	14.81%	15.31%	0.30%	44.38%	15.26%	30.37%
Note 1: 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.								
Note 2: Data Sources: APSH								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(Taunton, MA CDBG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	435	83.80%	8.45%	7.04%	0.00%	1.63%	69.07%	34.19%
Project-based Section 8								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	166	83.85%	8.07%	8.07%	0.00%	7.06%	73.53%	23.53%
Other Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	0.00%	N/a
HCV Program								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	1,298	64.05%	16.11%	19.68%	0.08%	47.15%	13.71%	30.43%
Note 1: 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.								
Note 2: Data Sources: APSH								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								

Since there are no R/ECAPs within the Consortium and the cities of Taunton and Attleboro, there are no differences between the demographic composition of publicly supported housing residents within and outside of R/ECAPs at that geographic level. The HUD AFFH-T Data & Mapping Tool does not include data responsive to this question for the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area; however, by looking at the demographics of publicly supported housing residents in entitlement jurisdictions that do have R/ECAPs, it is possible to draw some conclusions. In Brockton, publicly supported housing residents in R/ECAP and non-R/ECAP areas are demographically similar. In Providence, residents in R/ECAPs are more likely to be Black and Hispanic and less likely to be non-Hispanic White than residents in non-R/ECAP areas. From this data and the likelihood that publicly supported housing residents in non-R/ECAP areas immediately outside of communities like Brockton, it is possible to conclude that, within both regions, publicly supported housing residents within R/ECAPs are disproportionately likely to be Black and Hispanic.

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

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category								
Public Housing								
(Cnsrt-Taunton, MA CONSORTIA) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Cedarvale Apts	MA017	Taunton Housing	403	85%	8%	6%	0%	N/a
Lenox Green	MA017	Taunton Housing	44	63%	17%	20%	N/a	20%
Project-Based Section 8								
(Cnsrt-Taunton, MA CONSORTIA) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Hope Gardens	N/a	N/a	160	92%	1%	7%	1%	1%
North Attleboro Ma06h052037	N/a	N/a	12	91%	N/a	0%	9%	27%
Raynham Ma06h052022	N/a	N/a	67	98%	N/a	0%	2%	N/a
Norton Glen	N/a	N/a	150	82%	9%	7%	2%	66%
Taunton Green	N/a	N/a	75	84%	7%	8%	1%	N/a
Gardner Terrace I & II	N/a	N/a	144	83%	6%	8%	3%	N/a
Middleboro Ma06h052017	N/a	N/a	66	93%	N/a	2%	5%	N/a
Washington House	N/a	N/a	14	100%	N/a	0%	N/a	N/a
Mill Pond Apts (Taunton)	N/a	N/a	49	87%	2%	6%	2%	N/a
Taunton Gardens	N/a	N/a	32	56%	25%	16%	3%	38%

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category								
Public Housing								
(Taunton, MA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Cedarvale Apts	MA017	Taunton Housing	403	85%	8%	6%	0%	N/a
Lenox Green	MA017	Taunton Housing	44	63%	17%	20%	N/a	20%
Project-Based Section 8								
(Taunton, MA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Taunton Green	N/a	N/a	75	84%	7%	8%	1%	N/a
Washington House	N/a	N/a	14	100%	N/a	0%	N/a	N/a
Mill Pond Apts (Taunton)	N/a	N/a	49	87%	2%	6%	2%	N/a
Taunton Gardens	N/a	N/a	32	56%	25%	16%	3%	38%

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category								
Project-Based Section 8 (Attleboro, MA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Hope Gardens	N/a	N/a	160	92%	1%	7%	1%	1%
Gardner Terrace I & II	N/a	N/a	144	83%	6%	8%	3%	N/a

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

The two public housing developments for which data is available in the Consortium, both of which are in the City of Taunton, have significantly different demographics from each other. Lenox Green has a much higher concentration of Black and Hispanic residents than does Cedarvale Apartments. This is largely attributable to the fact that Cedarvale Apartments is a senior development while Lenox Green is family-occupancy. In Taunton, non-Hispanic White individuals make up 82.0% of persons with incomes below the poverty line who are 60 years of age or older. By contrast, just 66.6% of people below the age of 60 with incomes below the poverty line are non-Hispanic White.

With respect to Project-Based Section 8, the same pattern is evident. Senior developments tend to have non-Hispanic White population concentrations of between 80% and 100%. Family-occupancy developments are more variable. Taunton Gardens is more heavily Black and Hispanic than the senior developments while the North Attleboro and Norton Glen developments are not. It is worth noting that, at just 12 units, the occupancy of the North Attleboro development may simply be a random aberration. The Norton Glen development, however, is much larger. Its occupancy is reflective of the fact that the Town of Norton is 93.1% non-Hispanic White. Affirmative marketing efforts that reach beyond Norton's borders may be necessary in order to ensure the integration of that publicly supported development.

The only development in the Consortium to have undergone a RAD conversion is the Pine Grove Apartments in Taunton. Unfortunately, demographic information regarding this development is not available through the HUD AFFH-T Data & Mapping Tool. Because there are no other dwelling units on the Census Block that includes the Pine Grover Apartments, it is possible to determine what the demographics of the complex were as of the 2010 Census. At that point, 57.9% of residents were Hispanic, 27.8% were non-Hispanic White, and 9.0% were Black. Since the RAD conversion took place after that Census, these numbers do not reflect any change in occupancy that occurred because of the conversion. Once available, 2020

Census data will provide some insight. There may be particular cause for concern regarding the impact of RAD since this development was an outlier in its diversity prior to the conversion.

LIHTC development demographics are not readily available for the Consortium and the cities of Taunton and Attleboro.

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

Additional information about the demographics of residents are of other types of affordable housing, such as that subsidized under Massachusetts state programs or cross-subsidized by market rate development in the context of Massachusetts Chapter 40b projects, is not available.

- v. *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.*

Within the Consortium and the cities of Taunton and Attleboro, publicly supported housing developments generally either mirror the demographics of the municipalities and neighborhoods in which they are located, as is the case for senior housing developments, or are more heavily Black and Hispanic than their encompassing developments, which is the case for most family-occupancy developments. This is true for both public housing and Project-Based Section 8. There is very little publicly supported housing that primarily serves persons with disabilities in the three jurisdictions.

c. Disparities in Access to Opportunity

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

There are three principal clusters of publicly supported housing developments in the Consortium: one in the central and near-southern portion of Attleboro, one in the central and southeastern portion of Taunton, and one in Middleborough. Housing Choice Voucher holders are concentrated in central Taunton and in the southern portions of Middleborough. These areas have different characteristics with respect to access to opportunity. With

regard to access to proficient schools, the portions of Attleboro with concentrated publicly supported housing have high access to proficient schools while such access is moderate in the relevant portions of Taunton and low in Middleborough. With respect to job proximity, no portion of the Consortium has high levels of job proximity, but the same west-to-east, high-to-low pattern is present. The Job Proximity Index may not fully capture the presence of jobs in Taunton's large industrial park. With regard to labor market engagement, Attleboro and central Taunton actually have lower index values than does Middleborough, and all areas with concentrations of publicly supported housing within the consortium have lower levels of labor market engagement than other parts of the Consortium without much publicly supported housing such as the towns of Lakeville and Norton. With regard to access to high frequency transit, the areas of the Consortium with concentrations of publicly supported housing all have greater access than elsewhere in the Consortium though less than in larger nearby urban centers such as Brockton and Providence. The same is true with respect to the cost of transportation in Attleboro and Taunton but not in Middleborough. Access to low poverty neighborhoods is predictably low near publicly supported housing in the Consortium, albeit less so in Middleborough than in Attleboro and Taunton. Lastly, with respect to environmentally healthy neighborhoods, access is lower in areas with publicly supported housing, except for areas with many voucher holders in Middleborough, than in the Rest of the Consortium. Nonetheless, access to healthy neighborhoods is high in those areas in comparison to both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area.

In both the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area, the relationship between concentrations of publicly supported housing and access to opportunity is more predictable than it is within the Consortium and the cities of Taunton and Attleboro. Generally, dimensions of access to opportunity that are positively correlated with urban density, such as transit access and job proximity, are co-located with publicly supported housing concentrations in Brockton, Providence, Pawtucket, Fall River, and New Bedford. Ones that are typically associated with high opportunity suburbs, such as proficient schools, environmentally healthy neighborhoods, and labor market engagement, are disconnected from the location of publicly supported housing.

2. Additional Information

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

Massachusetts Chapter 40B creates a streamlined process for overriding local zoning in municipalities where less than 10% of housing units are affordable if a developer proposes to set aside 20-25% of units as affordable housing. The Massachusetts Department of Housing and Community Development publishes a Subsidized Housing Inventory which is used to determine whether a municipality falls above or below that 10% threshold. Many of the units counted in that inventory that are not reflected in the HUD-provided data discussed above were produced through Chapter 40B though others may be a result of local inclusionary zoning or

housing subsidized through state affordable housing programs. The table below reflects the inventory figures for the Consortium members.

Table: Massachusetts Department of Housing and Community Development Subsidized Housing Inventory for Consortium Members as of September 14, 2017

Community	2010 Census Year-Round Housing Units	Subsidized Housing Inventory Units	%
Attleboro	17,978	1,155	6.4%
Berkley	2,169	24	1.1%
Carver	4,514	146	3.2%
Dighton	2,568	144	5.6%
Freetown	3,263	86	2.6%
Lakeville	3,852	274	7.1%
Mansfield	8,725	939	10.8%
Middleborough	8,921	589	6.6%
North Attleboro	11,553	294	2.5%
Norton	6,707	533	7.9%
Plainville	3,459	572	16.5%
Raynham	5,052	489	9.7%
Seekonk	5,272	87	1.7%
Taunton	23,844	1,529	6.4%

Although units that are likely to be affordable under Chapter 40B are not evenly distributed across the Consortium, patterns of concentration do not appear to coincide with relative racial or ethnic concentration. For example, the town of Plainville, which has the highest percentage of Subsidized Housing Inventory units, is among the most heavily non-Hispanic White municipalities in the Consortium at 93.5%. It appears that Chapter 40B has helped to disperse affordable housing across a broader range of communities within the Consortium than would be the case through federal publically supported housing programs alone.

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

The City of Taunton has made place-based investments in its central core, including in areas with publicly supported housing developments. These investments are discussed in greater detail in connection with the contributing factor regarding community revitalization strategies. The Taunton Housing Authority operates a Family Self-Sufficiency Program with the purpose of enabling Housing Choice Voucher holders to obtain and sustain employment. There is no mobility counseling program operating within the Consortium.

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate

Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing

Admissions and occupancy policies, including preferences in publicly supported housing, are a significant contributing factor to segregation and disparities in access to opportunity for residents of publicly supported housing both within the Consortium and regionally. Multiple housing authorities within the Consortium give preference in tenant selection to residents of the local municipality. These housing authorities include ones that serve municipalities that are overwhelmingly non-Hispanic White in comparison to the Consortium, such as Dighton and Middleborough, and that are disproportionately non-Hispanic White in relation to the broader region, such as Attleboro. These types of policies make it more difficult for Black and Hispanic residents of Taunton or of diverse cities near the Consortium like Providence, Pawtucket, New Bedford, and Brockton to move to predominantly non-Hispanic White communities within the Consortium, some of which offer considerable amenities that would increase publicly supported housing tenants' access to opportunity. In fact, the Middleborough Housing Authority was the defendant in a precedent-setting Fair Housing Act law suit in the late 1990s and early 2000s over this precise type of practice.

In addition to residency preferences, overly broad criminal background screening policies also contribute to segregation in the Consortium and in the City of Attleboro, in particular. In its Housing Choice Voucher Administrative Plan, the Attleboro Housing Authority reports that it utilizes a five-year lookback period for drug-related and violent offenses regardless of the severity of the offense and that it considers arrest records, albeit not to the same extent as conviction records, in making eligibility determinations. It is very difficult to justify a five-year lookback period for minor violent offenses, such as, for example, misdemeanor assault. It is a better practice for public housing authorities to employ a longer lookback period for felony offenses than they do for misdemeanors. Additionally, HUD guidance has warned against reliance on arrest records in making eligibility determinations. Because of disparities in the criminal justice system, these overly broad policies are more likely to result in the exclusion of Black and Hispanic applicants from publicly supported housing in the City of Attleboro, thus contributing to residential segregation.

- Community opposition

Community opposition is discussed in more detail in the Segregation section. Community opposition is a significant factor for Public Supported Housing.

- Displacement of residents due to economic pressures

Displacement due to economic pressures is discussed in more detail in the Segregation section. It is not a significant contributing factor to Publicly Supported Housing.

- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Displacement of victims of domestic violence is discussed in more detail in the Disproportionate Housing Needs section. It is not a significant contributing factor to Publicly Supported Housing.

- Impediments to mobility

Impediments to mobility is discussed in more detail in the Disparities in Access to Opportunity section. Impediments to mobility are a significant contributing factor to disparities in access to opportunity and the segregation of residents of publicly supported housing.

- Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is discussed in the Disparities in Access to Opportunity section. Lack of access to opportunity due to high housing costs is a significant contributing factor to disparities in access to opportunity and disproportionate housing needs in the Consortium as well as regionally.

- Lack of meaningful language access

In the HOME Consortium cities, the lack of meaningful language access for individuals with limited English proficiency is not a significant contributing factor. HUD's Limited English Proficiency (LEP) guidance requires making reasonable efforts to provide language assistance. This includes conducting HUD's recommended four-factor analysis, determining that translated documents are needed by LEP applicants or those with which the PHAs may come into contact, and that specifies the translation of vital materials, as needed. None of the housing authorities within the consortium have advertised translation services for either their websites or any forms/applications provided. However, perhaps arguably with the exception of a few areas with a high Portuguese population, there is not a substantial need for such language access services.

- Lack of local or regional cooperation

Lack of local or regional cooperation is discussed in greater detail in the Segregation section. It is a significant contributing factor to Publicly Supported Housing.

- Lack of private investment in specific neighborhoods

Lack of public investments in specific neighborhoods is discussed in more detail in the Segregation section. It is a contributing factor to Publicly Supported Housing.

- Lack of public investment in specific neighborhoods, including services and amenities

Lack of public investment in specific neighborhoods is discussed in more detail in the Segregation section. It is a significant contributing factor to Publicly Supported Housing.

- Land use and zoning laws

Land use and zoning is discussed in more detail in the Segregation section. It is a significant contributing factor to Publicly Supported Housing.

- Loss of Affordable Housing

Loss of affordable housing is discussed in more detail in the Segregation section. It is a significant contributing factor to Publicly Supported Housing.

- Occupancy codes and restrictions

Occupancy codes and restrictions are discussed in more detail in the Segregation section. It is not a significant contributing factor to Publicly Supported Housing.

- Quality of affordable housing information programs

The quality of affordable housing information programs is a significant contributing factor to the segregation of publicly supported housing residents in the Consortium, the Cities of Taunton and Attleboro, the custom region, and the Providence-Warwick, RI-MA Metropolitan Statistical Area. Robust mobility counseling for Housing Choice Voucher holders does not appear to be available from public housing authorities throughout the area. As the data shows, within the Consortium, voucher holders are relatively concentrated in central Attleboro, Taunton, and Middleborough, and, regionally, voucher holders are concentrated in racially and ethnically diverse cities like Providence, Pawtucket, Brockton, and New Bedford. Better informing voucher recipients in these places of residential options in predominantly non-Hispanic White high-opportunity areas would promote residential integration and access to opportunity. The Taunton Housing Authority, in particular, should prioritize the identification of philanthropic or competitive grant support for mobility counseling. Affirmative marketing efforts for publicly supported housing developments in high-opportunity areas within the Consortium should also prioritize diverse cities outside of the Consortium for geographically targeted affirmative marketing efforts.

- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs, are not presently a significant contributing factor to the segregation of publicly supported housing residents. The Massachusetts Department of Housing and Community Development has among the most robust incentives for the siting of Low-Income Housing Tax Credit developments in disproportionately non-Hispanic White, high-opportunity areas of any state housing finance authority in the

country. Both Massachusetts and Rhode Island also have statutes, Chapter 40B in Massachusetts and the Rhode Island Low- and Moderate-Income Housing Act, that strongly incentivize high opportunity localities to facilitate the development of affordable housing in order to avoid being subject to a builder's remedy. Instead, the more significant drivers of segregation in publicly supported housing are the legacy of past siting policies and practices, zoning and land use policies, and the fact that many public housing authorities in high opportunity areas only administer Housing Choice Vouchers and do not have an inventory of hard units of public housing.

- Source of income discrimination

Source of income discrimination is discussed in more detail in the Segregation section. Source of income discrimination is not a significant contributing factor.

- Other

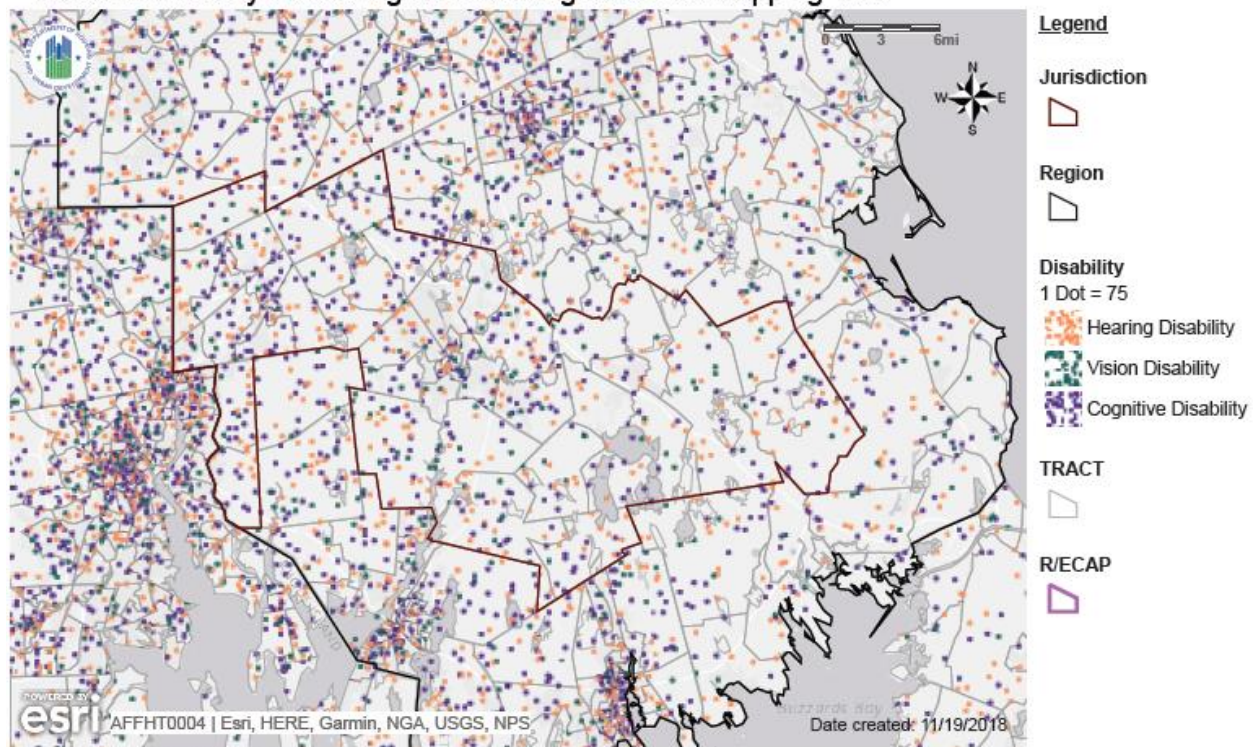
N/A

V. FAIR HOUSING ANALYSIS

D. Disability and Access

Population Profile

Map 1: Disability By Type (Hearing, Vision, Cognitive), Taunton Consortium
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

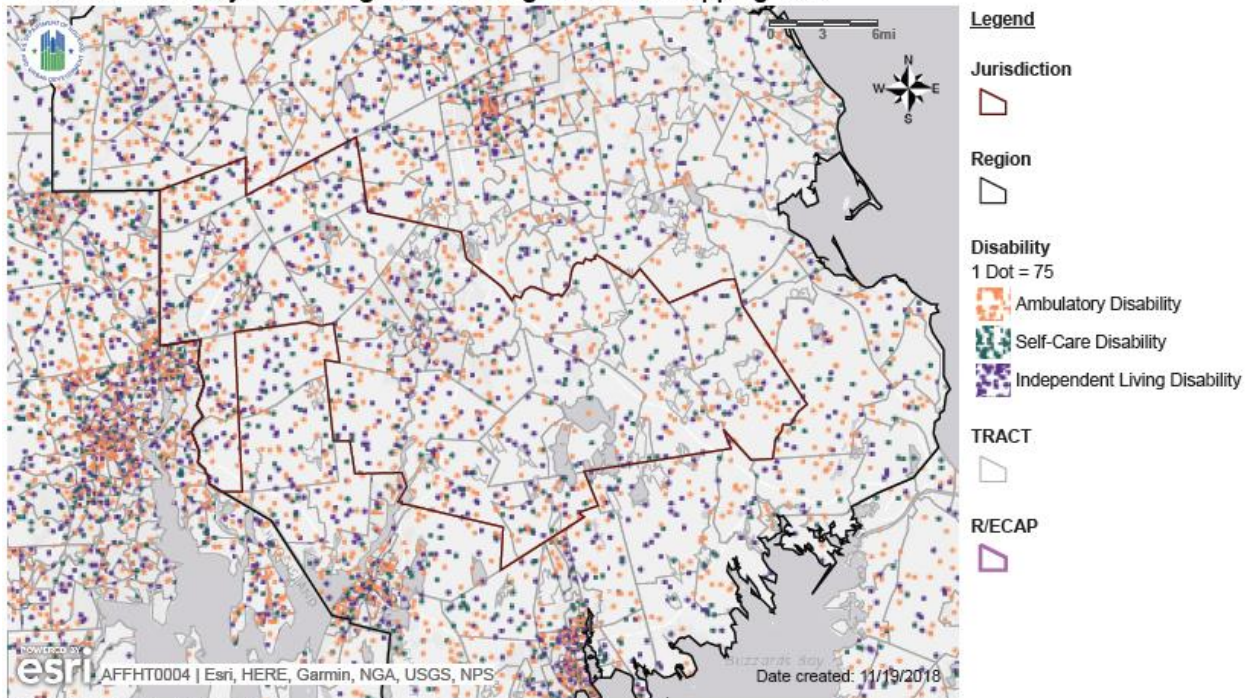
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 2: Disability by Type (Ambulatory, Self-Care, Independent Living), Taunton Consortium

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

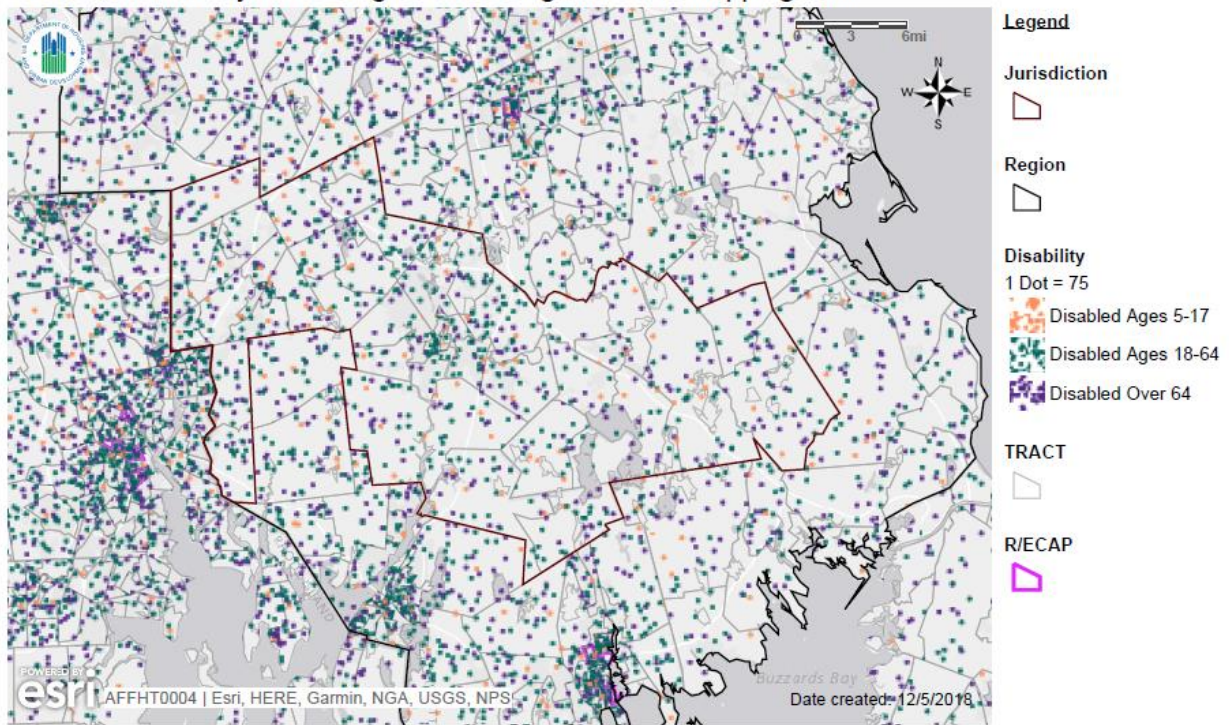
Jurisdiction: Cnsrt-Taunton (CONSORTIA)

Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 3: Disability by Age, Taunton Consortium

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 15 - Disability by Age Group

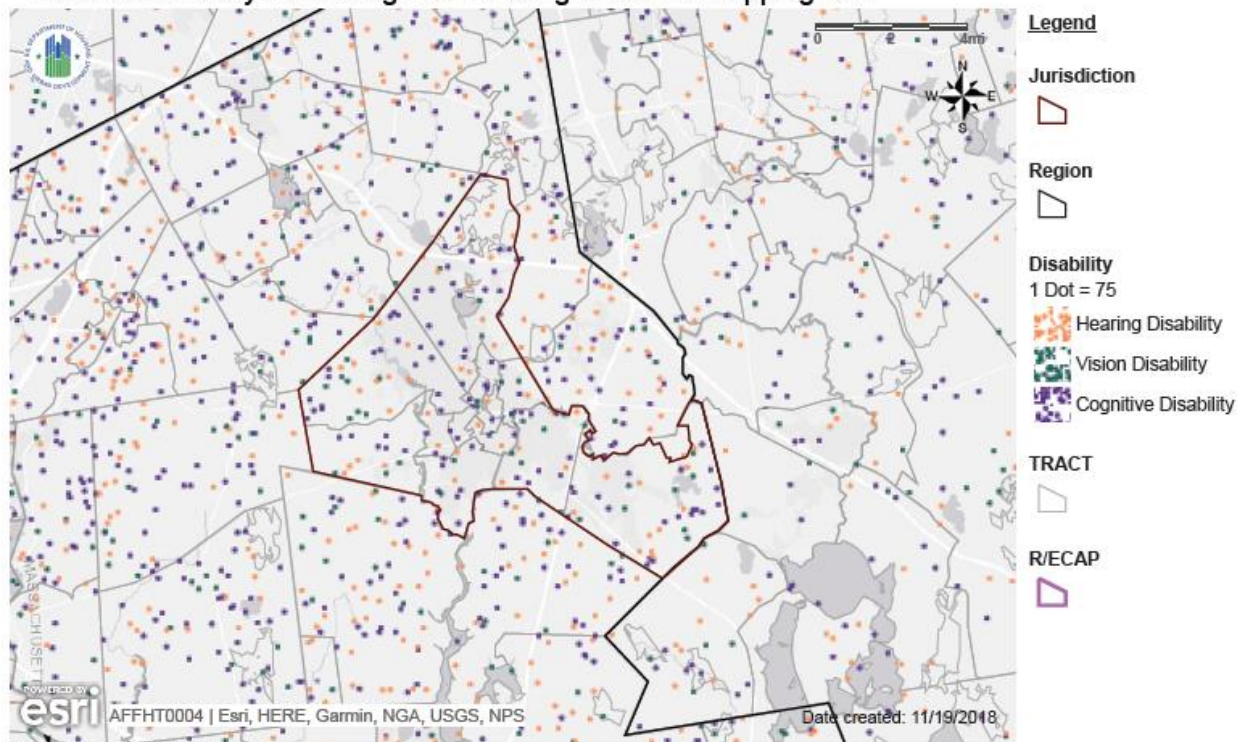
Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Cnsrt-Taunton (CONSORTIA)

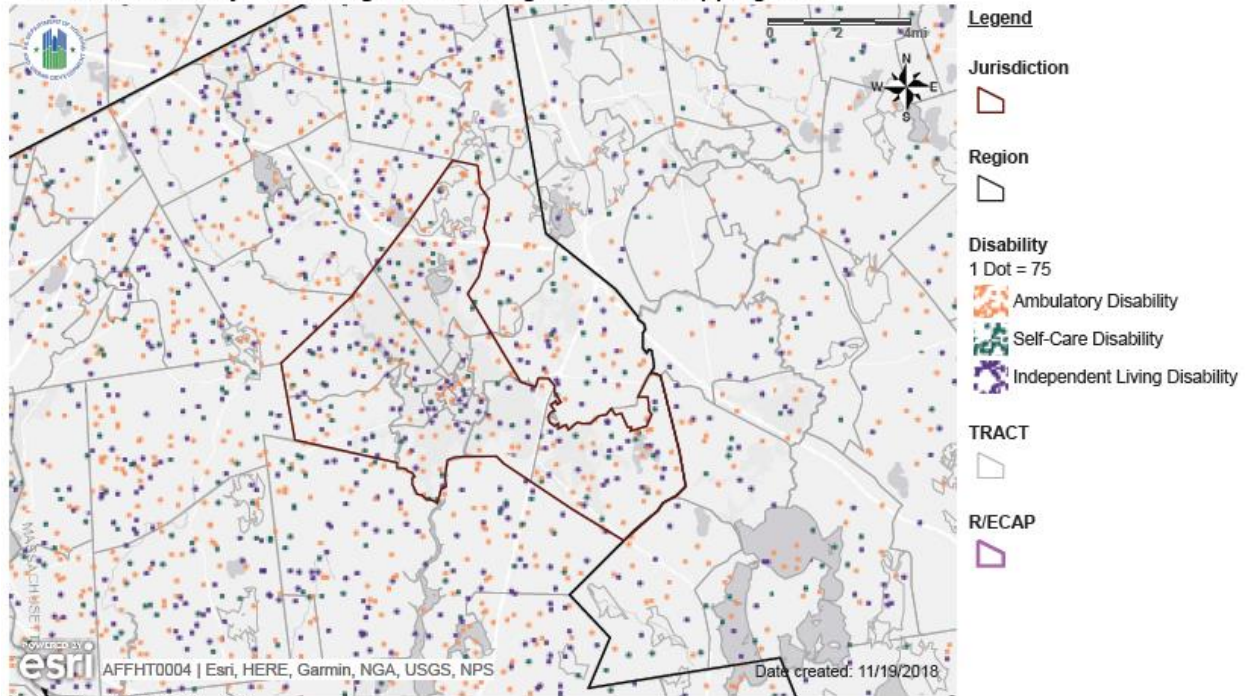
Region: CNSRT-Taunton, MA - custom

HUD-Provided Data Version: AFFHT0004

Map 4: Disability by Type (Hearing, Vision, Cognitive), Taunton, MA
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 5: Disability by Type (Ambulatory, Self-Care, Independent Living), Taunton, MA
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

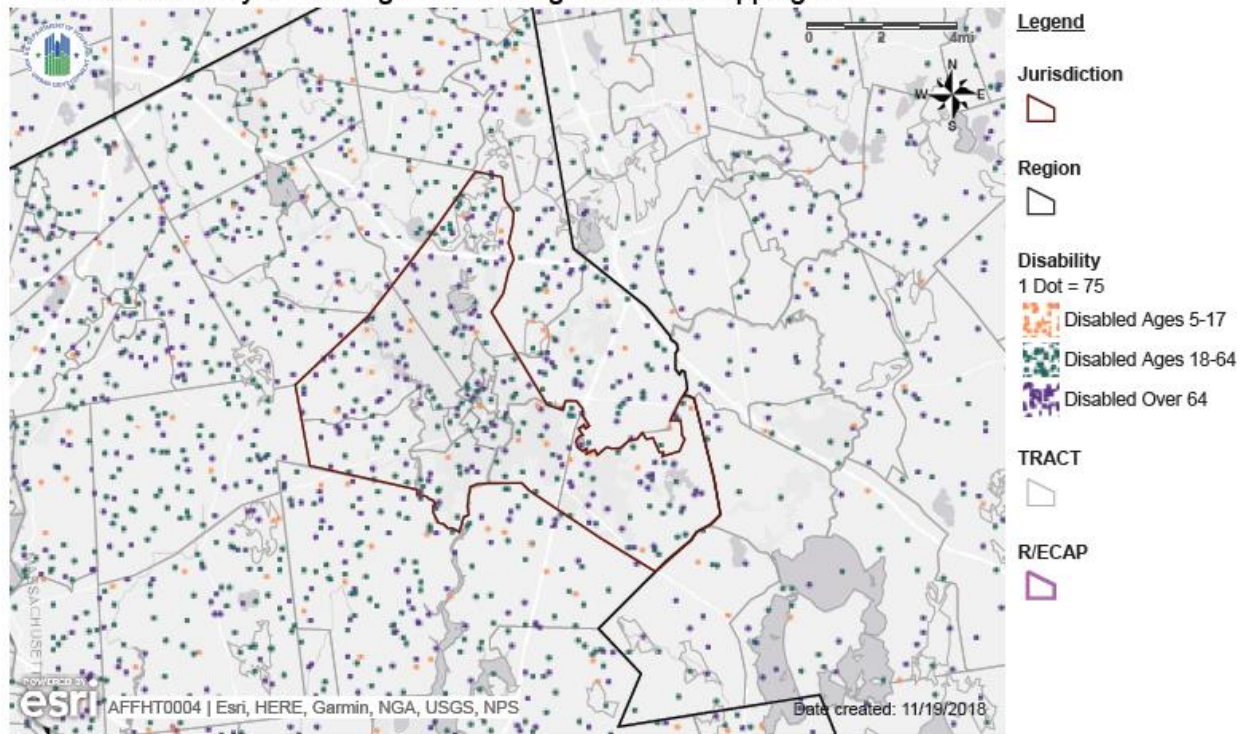
Jurisdiction: Taunton (CDBG)

Region: Providence-Warwick, RI-MA

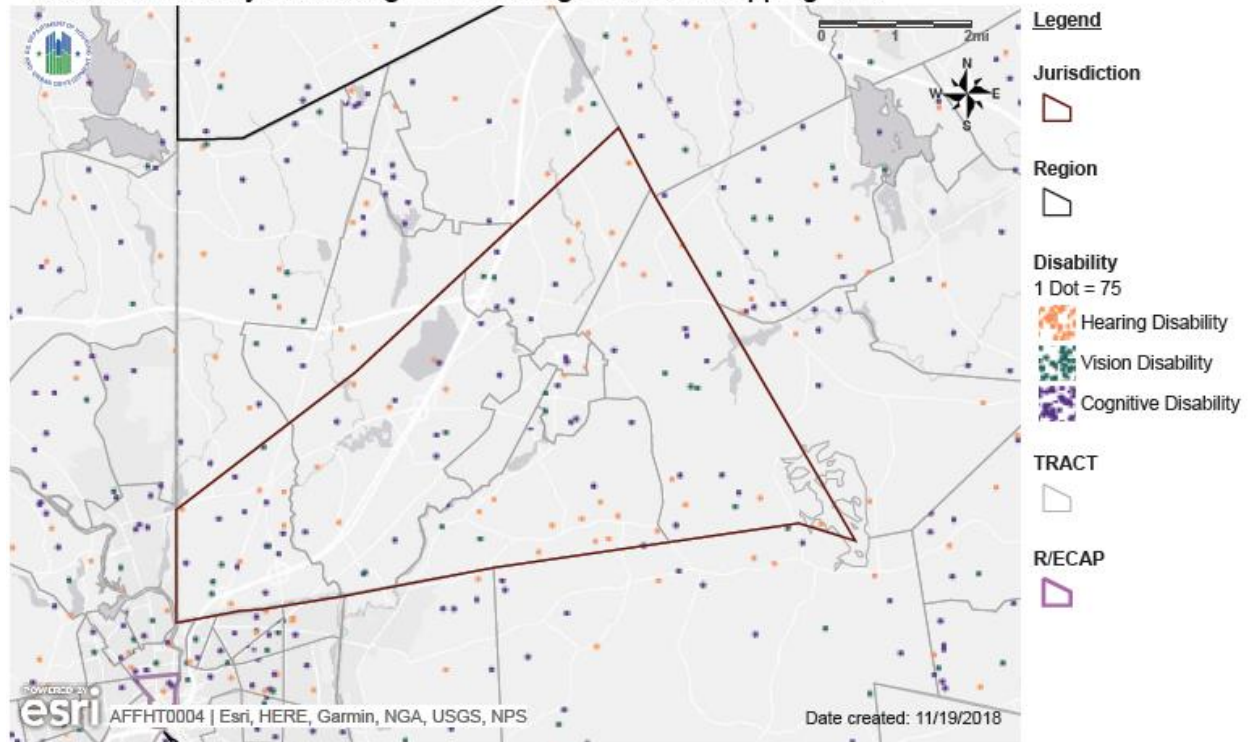
HUD-Provided Data Version: AFFHT0004

Map 6: Disability by Age, Taunton, MA

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 7: Disability by Type (Hearing, Vision, Cognitive), Attleboro, MA
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

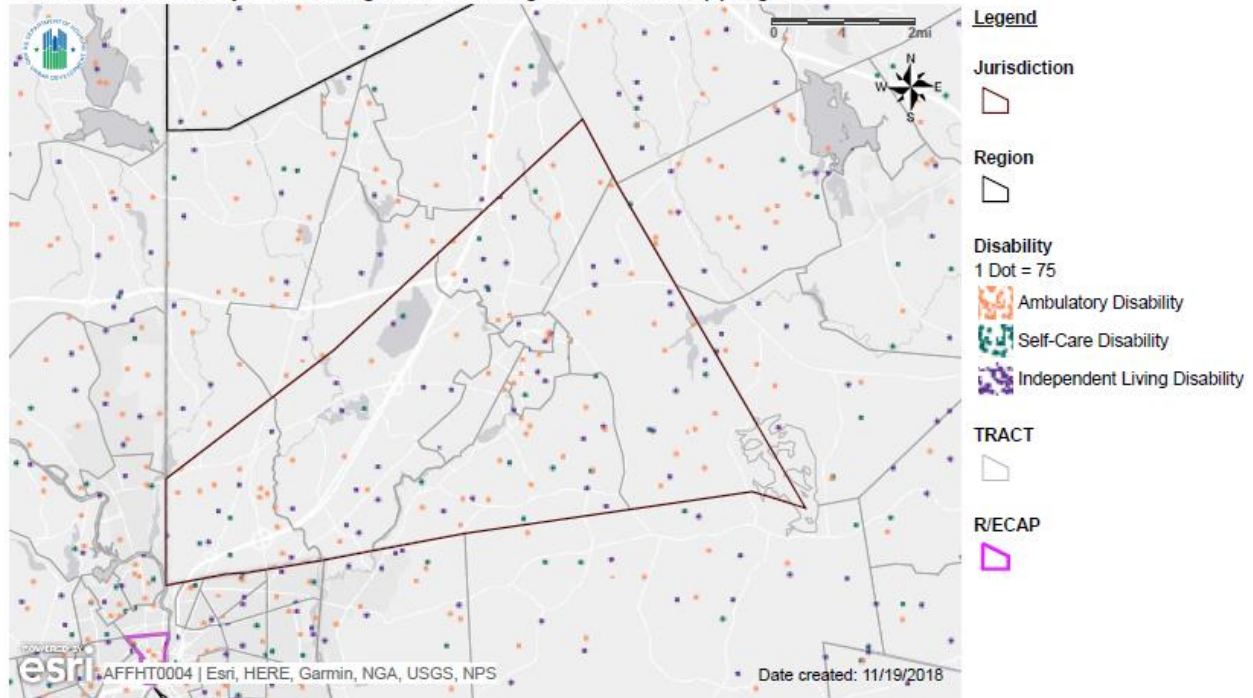
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Attleboro (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Map 8: Disability by Type (Ambulatory, Self-Care, Independent Living), Attleboro, MA 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

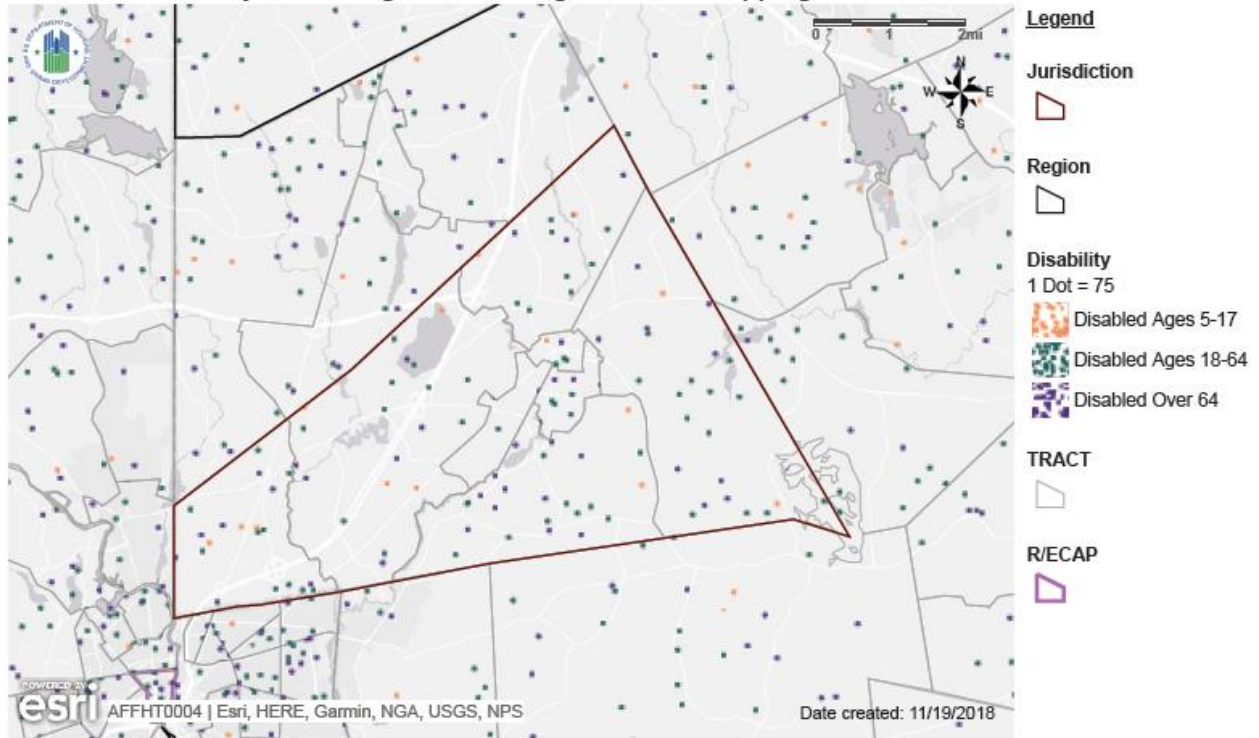
Jurisdiction: Attleboro (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Map 9: Disability by Age, Attleboro, MA

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: Attleboro (CDBG)

Region: Providence-Warwick, RI-MA

HUD-Provided Data Version: AFFHT0004

Table 1: Disability by Type

Disability Type	Taunton Consortium		Region	
	#	%	#	%
Hearing difficulty	9,846	3.5	59,311	3.4
Vision difficulty	5,030	1.8	30,629	1.7
Cognitive difficulty	13,832	5	81,031	4.6
Ambulatory difficulty	14,652	5.3	95,282	5.4
Self-care difficulty	6,180	2.2	39,132	2.2
Independent living difficulty	10,987	4.0	92,572	5.3

	Attleboro, MA Jurisdiction		Taunton, MA Jurisdiction		Providence- Warwick, RI-MA Region	
Disability Type	#	%	#	%	#	%
Hearing difficulty	1,821	4.2	2,368	4.2	58,439	3.7
Vision difficulty	704	1.6	1,816	3.2	33,938	2.1
Cognitive difficulty	2,397	5.9	4,408	8.4	89,388	5.9
Ambulatory difficulty	2,559	6.3	4,197	8	106,480	7.1
Self-care difficulty	936	2.3	1,787	3.4	44,274	2.9
Independent living difficulty	1,837	5.5	3,292	7.4	78,170	6.2

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

ACS Disability Information

According to the 2012-2016 American Community Survey (ACS) 5-Year Estimates, 14,652 residents of the Taunton Consortium have ambulatory disabilities, which represents 5.3% of the Consortium's population; 9,846 residents have hearing disabilities; and 5,030 residents have vision disabilities. The definition of ambulatory disabilities is "having serious difficulty walking or climbing stairs." People with ambulatory disabilities may not need a fully accessible unit, particularly if they do not use wheelchairs. They may require a unit on the ground floor or in an elevator building, perhaps with some architectural modifications. Therefore, ambulatory disabilities is not an accurate indicator of the number of accessible mobility units needed since people with ambulatory disabilities don't necessarily require to a wheelchair.

Approximately seventeen percent (17.4%) of people with disabilities have incomes below the poverty line, as opposed to 6.3% of individuals without disabilities. Although a breakdown of poverty status by type of disability is not available through the American Community Survey (ACS), it is clear that the need for affordable housing is greater among people with disabilities than it is among people without disabilities. Another indicator of disability and limited income are the number of people receiving Supplemental Social Security (SSI) which is limited to people with disabilities. Six thousand one hundred and three (6,103) Taunton Consortium households receive SSI which is such a small subsidy that all of the recipients are extremely low-income. Not all SSI recipients have the types of disabilities that necessitate accessible units.

Concentration and Patterns

People with disabilities in the region tend to be concentrated in the areas of the greatest population density. The pattern is much less stark in the Consortium, as the general population is quite well distributed across the area, though with a slight preference for the western half toward Providence. Disability residential patterns are more noticeable in higher density places like Providence.

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 region.

When disaggregated by age, there is a preference amongst elderly people with disabilities for the western half of the Consortium, with the rural eastern half much less populated. Disaggregating by type of disability also makes this clear, with a preference for the western half of the Consortium correlating with ambulatory, self-care, and independent living disabilities (often experienced at a higher rate by elderly residents). Beyond these, vision difficulty has the most obvious concentration pattern, with a strong presence in the Taunton metropolitan area. Children with disabilities are the most evenly-distributed, presumably because their parents are less constrained by what supportive resources may be available.

Housing Accessibility

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

Accessibility Requirement for Federally-Funded Housing

HUD's implementation of Section 504 of the Rehabilitation Act of 1973 (24 CFR Part 8) requires that federally financed housing developments have five percent (5%) of total units be accessible to individuals with mobility disabilities and an additional two percent (2%) of total units be accessible to individuals with sensory disabilities. It requires that each property, including site and common areas, meet the Federal Uniform Accessibility Standards (UFAS) or HUD's Alternative Accessibility Standard.

Within the Taunton Consortium, there are 506 public housing units, 794 Project-Based Section 8 units, and 8 Multifamily Housing units that are subject to Section 504 of the Rehabilitation Act. Public Housing and Project Based Section 8 units are considered to be Publicly Supported Housing. One hundred forty-eight (148) people with disabilities reside in public housing and 184 reside in Project-Based Section 8 units. At this time, we don't know how many accessible units are in public housing or among Project Based Section 8 units. Project Based Section 8 units are located in properties assisted by the Consortium and in private properties with no Consortium financing.

The HOME Partnership Program is a grant of federal funds for housing related activities, therefore, these units are subject to Section 504. The Taunton HOME Consortium has historically pledged its HOME funds to a combination of Homebuyer Assistance, Housing Rehabilitation, Housing Development (through CHDOs), and administration costs. CHDO Housing Development has not been very robust of late, however, with the 2018 Annual Action Plan reporting that CHDO development is 2 units shy of its goal of 7 rental units; there were also no applications submitted by CHDOs in the most recent funding cycle. With regard to the Homebuyer Assistance program, it is hard to say whether those houses are accessible; as the houses were not *built* using HOME funds, they are not subject to Section 504.

Low Income Housing Tax Credit (LIHTC) Units

According to data from HUD's LIHTC database, there are 992 low-income units in LIHTC financed developments in the Taunton Consortium, all of which have been placed into service since 1991 and are subject to Fair Housing Act accessibility requirements. LIHTC affordable units outnumber each other category of publicly supported housing, and increases the overall number of affordable units by more than 75%. Although LIHTC-funded buildings are required to accept Housing Choice Vouchers, Massachusetts state law protects against source of income discrimination, so there is not a strong correlation between LIHTC sites and census tracts with high HCV usage.

Housing Choice Vouchers

Six hundred thirty-three (633) people with disabilities reside in units assisted with Housing Choice Vouchers in the Taunton Consortium, but this does not represent a proxy for actual affordable, accessible units. Rather, Housing Choice Vouchers are a mechanism for bringing otherwise unaffordable housing, which may or may not be accessible, within reach of low-income people with disabilities. Unless another source of federal financial assistance is present, units assisted with Housing Choice Vouchers are not subject to Section 504 although participating landlords remain subject to the Fair Housing Act's duty to provide reasonable accommodations and to allow tenants to make reasonable modifications at their own expense.

Fair Housing Amendments Act Units

The Fair Housing Amendments Act of 1988 (FHAA) covers **all** multifamily buildings of four or more units that were first occupied on or after March 13, 1991 – not just affordable housing developments. The FHAA added protections for people with disabilities and prescribed certain basic accessibility standards, such as one building entrance must be accessible; there must be an accessible route throughout the development, and public rooms and common rooms must be accessible to people with disabilities. Although these accessibility requirements are not as intensive as those of Section 504, they were a first step in opening many apartment developments to people with disabilities regardless of income level. The FHAA was also very helpful for middle-income and upper-income people with disabilities also need accessible housing. It is important to note that FHAA units are **not** the same as accessible units under Section 504 or ADA Title II. Therefore, utilizing FHAA units as a proxy for the number of accessible housing units available or required under Section 504 or ADA Title II does not produce an accurate count. Although they are not fully accessible, these units are an important source of housing for people with disabilities who do not need a mobility or hearing/vision unit.

Data breaking down affordable, accessible units by number of bedrooms is not available for private housing. For Publicly Supported Housing, the overwhelming majority (84.91%) of Public Housing units are 0-1-bedroom units, and the strong majority (69.96%) of Project-Based Section 8 are as well. HCV units are spread much more evenly across bedroom sizes. In considering the overall distribution of publicly supported units by number of bedrooms, it is important to keep in mind that the number of HCV units in the Taunton Consortium is significantly greater than the number of public housing or Project-Based Section 8 units. HCV units are also more than twice

as likely to house a family with children as Project-Based Section 8, and more than four times as likely as public housing. It appears that affordable, accessible units that can accommodate families with children are extremely limited in the Consortium. Although data reflecting the percentage of families with children that include children with disabilities is not available, 5.0% of all (noninstitutionalized) children in the Consortium have a disability. If children with disabilities are evenly distributed across families with children, about 1,549 families in the Consortium include a child with a disability. Data reflecting the distribution of Publicly Supported Housing units by type of Publicly Supported Housing and by number of bedrooms is not available at a regional level.

Focusing on the region as opposed to the Consortium-level makes the situation appear more dire. The proportion of the population that is comprised of people with disabilities is roughly similar to that of the Consortium. For example, 5.4% of residents of the region have an ambulatory disability, and 3.4% of residents have a hearing disability, as opposed to 5.3% and 3.5% of Consortium residents respectively. At the same time, both Publicly Supported Housing and multi-family housing, which are more likely to be accessible because of the requirements of Section 504 and the Fair Housing Act, are disproportionately concentrated in metropolitan areas. Many accessible, unsubsidized units are likely to be unaffordable to low-income. These trends are mirrored at the regional level. Overall, it is clear that the supply of affordable, accessible housing falls short of the level of need for such housing among people with disabilities in the Taunton Consortium.

Summary

Overall, it is clear that the supply of affordable, accessible units in both the Taunton Consortium and the region is insufficient to meet the need. Over 14,000 Consortium residents have some level of need for accessible units, with an additional 8,000 residents with hearing difficulty and 4,000 residents with vision difficulty. By the most generous, over-inclusive measures, there may be roughly 3,500 units that have been produced subject to the Fair Housing Act's design and construction standards and approximately 1,300 units that must be accessible subject to Section 504. There is, without question, some overlap between these two categories, some of these units are likely non-compliant, and some accessible units are occupied by individuals who do not have disabilities.

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

Relying on the discussion of Publicly Supported Housing to guide the assessment of which types of housing are most likely to be affordable and accessible, such housing is highly concentrated in the metropolitan areas of Taunton, Attleboro, and Middleboro. These population centers also tend to have strong concentrations of minorities.

By contrast, using the year of construction as a way to estimate the presence of accessible units, accessible units would appear to be much more integrated. The newest housing stock tends to be in the wealthy suburban areas, with the youngest median year of construction in the area south of Taunton. Attleboro and Taunton have the oldest median year of construction, but as metropolitan

areas, they are also far more likely to have newer, accessible apartment buildings. The data also shows a strong preference for Housing Choice Voucher usage (44%) in Lakeville, just south of Middleboro, so there may be more accessible housing to be found there as well. There is at least one assisted living community for elderly residents in Lakeville, The Fairways, which is accessible as well.

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 5 Disability by Publicly Supported Housing Program Category

CNSRT-Taunton, MA CONSORTIA Jurisdiction	# of People with a Disability	% of People with a Disability
Public Housing	148	31.03%
Project-Based Section 8	184	23.83%
Other Multifamily	N/A	N/A
HCV Program	633	29.93%
CNSRT-Taunton, MA - Custom Region	# of People with a Disability	% of People with a Disability
Public Housing	2,251	29.24%
Project-Based Section 8	2,302	25.57%
Other Multifamily	12	2.86%
HCV Program	5,392	30.27%
Taunton, MA CBDG Jurisdiction	# of People with a Disability	% of People with a Disability
Public Housing	148	31.03%
Project-Based Section 8	40	20.94%
Other Multifamily	N/a	N/A
HCV Program	382	29.73%
Attleboro, MA CDBG Jurisdiction	# of People with a Disability	% of People with a Disability
Public Housing	N/a	N/A
Project-Based Section 8	97	32.01%
Other Multifamily	N/a	N/A
HCV Program	50	31.25%
Providence-Warwick, RI-MA Region	# of People with a Disability	% of People with a Disability
Public Housing	3,374	32.41%
Project-Based Section 8	4,717	36.59%
Other Multifamily	143	19.19%
HCV Program	4,417	28.45%

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

Note 3: “#” represents Unit count, not count of individual persons

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

In the Taunton Consortium, according to the 2012-2016 American Community Survey 5-Year Estimates, 11.7% of the civilian noninstitutionalized population has a disability. In the Taunton Custom Region, that figure is 11.6%. Meanwhile in Attleboro it is 12.9% and in Taunton it is 16.1%, with the Providence-Warwick, RI-MA Region at 13.5%. The American Community Survey does not facilitate the disaggregation of the population of people with disabilities by income in order to facilitate an assessment of what percentage of households that are income-eligible for Publicly Supported Housing include one or more people with disabilities. As the table above reflects, the proportion of people with disabilities in nearly every category of Publicly Supported Housing, exceeds the overall population concentration of people with disabilities (with the exception of Other Multifamily in Taunton, MA). In light of the socioeconomic disparities between people with disabilities discussed above, it is possible that the representation of people with disabilities in those categories of Publicly Supported Housing is merely at parity with or even lags representation in the income-eligible population. Overall, it is clear that there are high numbers of Housing Choice Vouchers utilized in the region, but there is not a noticeable difference in the use of HCVs vs. more traditional public housing when it comes to disability status.

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

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, States primarily housed people with intellectual and developmental disabilities and individuals with psychiatric disabilities in large state-run institutions. Within these institutions, people 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 people 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 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 (DOJ) implementing Title II of the Americans with Disabilities Act (ADA), if a state or local government provides supportive services to people 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 of what comprises a home and community-based setting have evolved over time. Although it is clear that state institutional facilities 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 such segregated settings, and the degree of integration present in group homes often corresponds to their size.

The Department of Mental Health and the Department of Developmental Services are the main agencies that provide services to individuals with psychiatric disabilities or developmental disabilities. The majority of people served in Massachusetts live at home with their families.¹²¹ Massachusetts also offers group home for adults over 18, but does not offer group homes for children.¹²² Provider-operated and state-operated homes are available.¹²³ Group homes are called Shelter Plus Care Homes, and eligible individuals must be clients of the Department of Mental Health, Department of Developmental Services, of the Department of Public Health.¹²⁴ Partially Supervised Group Housing and Supportive Housing are also available; individuals must be clients of the Department of Mental Health to be eligible.¹²⁵ Massachusetts also operates six Developmental Centers, which provide 24-hour support to individuals who need constant care.¹²⁶ Massachusetts provides services to 32,000 adults with intellectual disabilities and children with developmental disabilities.¹²⁷ The state currently serves more than 8,600 children with developmental disabilities and their families.¹²⁸

Individuals can also receive community-based supportive services through Centers for Independent Living. The typical cost of independent community-based living is \$35-50,000, which institutionalization costs \$110,000.¹²⁹ Centers for Independent Living provide counseling, skills training, advocacy, and information and referral.¹³⁰ Some centers also provide housing referrals, communication help, support groups, transportation, and health information.¹³¹ The Southeast Center for Independent Living in Fall River is the most accessible to residents of the Consortium.¹³² Additional services provided by this center include Drivers Education Courses, Computer Training, and Financial Literacy Courses.¹³³ It also functions as a drop off site for Durable Medical Equipment.¹³⁴

¹²¹ <http://medicaidwaiver.org/state/massachusetts.html>

¹²² *Id.*

¹²³ *Id.*

¹²⁴ <https://namimass.org/resources/housing-shelter-resources>

¹²⁵ *Id.*

¹²⁶ <http://medicaidwaiver.org/state/massachusetts.html>

¹²⁷ *Id.*

¹²⁸ *Id.*

¹²⁹ <https://www.mass.gov/service-details/independent-living-centers>

¹³⁰ *Id.*

¹³¹ *Id.*

¹³² <https://www.mass.gov/locations/southeast-center-for-independent-living>

¹³³ *Id.*

¹³⁴ *Id.*

Individuals with serious mental illness can also utilize Recovery Learning Communities, which are networks for self-help/peer support, information and referral, advocacy, and training activities.¹³⁵ RLCs work in collaboration with mental health providers, other human service agencies, and the communities toward a mission of community integration.¹³⁶ The most accessible locations for members of the Consortium, depending on the area, are the Fall River and Brockton branches of the Southeast RLC.¹³⁷

Psychiatric Disabilities

The Massachusetts Department of Mental Health (DMH) serves as the State Mental Health Authority, and provides access to services for people with psychiatric disabilities in the state. Most mental health services, including medication and therapy, are provided by health insurance provided by MassHealth (Medicaid and CHIP), employer-provided health insurance, and through the Massachusetts health insurance exchange. The DMH provides supplemental services for people with serious needs. DMH Adult Services provide community-based supports including case management, Community-Based Flexible Support (CBFS), Programs of Assertive Community Treatment (PACT), Respite, Clubhouses, Recovery Learning Communities (RLCs), crisis stabilization units, and homelessness services. Massachusetts also operates six Developmental Centers (state-owned institutions) for people who need 24-hour support. The six Developmental Centers are the successor to a long legacy of state hospitals, known in popular culture for their poor conditions and sensationalized stories about their patients, which are defunct now. The move toward more integrated settings is admirable, but advocacy groups still report that the number of psychiatric beds available falls far short of the amount the state of Massachusetts needs.¹³⁸

An estimated 60,000 people in Massachusetts have schizophrenia, and 121,000 have severe bipolar disorder.¹³⁹ Massachusetts, like every other state, has civil commitment laws that allow for the involuntary treatment of individuals with severe mental illness.¹⁴⁰ However, Massachusetts is one of only three states that do not authorize assisted outpatient treatment (AOT), which is involuntary treatment in a community setting.¹⁴¹ A minimum of 50 public psychiatric beds per 100,000 people is considered necessary to meet the treatment needs of people with severe mental illness.¹⁴² Since 2010, over 80 beds have been lost in the state, with a per capita ranking of just 38.¹⁴³ Massachusetts also incarcerates more individuals than it hospitalizes, but the likelihood of incarceration vs. hospitalization is quite low, at a rate of 1.2 to 1.¹⁴⁴ Massachusetts has also established mental health courts and crisis intervention training to try to divert individuals with severe mental illness away from the criminal justice system.¹⁴⁵

¹³⁵ <https://www.mass.gov/service-details/recovery-learning-communities>

¹³⁶ *Id.*

¹³⁷ http://www.southeastrlc.org/fallriver_index.html

¹³⁸ <https://www.treatmentadvocacycenter.org/browse-by-state/massachusetts>

¹³⁹ *Id.*

¹⁴⁰ *Id.*

¹⁴¹ *Id.*

¹⁴² *Id.*

¹⁴³ *Id.*

¹⁴⁴ *Id.*

¹⁴⁵ *Id.*

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

As far as affordable housing preferences go, the easiest way for people with disabilities to receive a preference in assignment to affordable housing is to also qualify for elderly housing. This is because there are several dedicated elderly housing facilities throughout the Consortium. The Taunton Housing Authority has partnered with Bristol Elder services to create the Support Housing Program, which combined subsidized housing with supportive services like case management and personal care assistance. There is, undoubtedly, a significant overlap between the elder population and people with disabilities, however – these preferences run the risk of leaving other vulnerable populations, especially disabled children, behind. Still, some PHA's, such as Taunton's, also have assignment preferences for persons with disabilities. These assignment preferences are unique to each PHA.

Supportive services are available through the Department of Mental Health and the Department of Developmental Services. Massachusetts also utilizes several Medicaid Waiver Programs, including the children's autism home and community-based services waiver program, the adult residential waiver, community living waiver, adult supports waiver, home and community-based services waiver for persons with traumatic brain injury, and frail and elder home and community-based services waiver. Currently, approximately 32,000 adults with intellectual disabilities and children with developmental disabilities are served by the state, and the majority of them live at home with their families. Massachusetts does not maintain a waiting list for Medicaid Waiver services; however, each waiver does have a limit on the number of people who can be served each year.

Disparities in Access to Opportunity

To what extent are people with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

Government services and facilities

People with auditory and speech disabilities face significant barriers in accessing emergency services. It takes an estimated three to eight minutes for individuals to be connected via relay services compared to a national standard of being connected within ten seconds for at least 90% of emergency calls. This lag has the potential to endanger people with disabilities and their property when threatened by criminal behavior or fire. It can also result in people with disabilities receiving needed medical care in a less timely fashion than individuals without disabilities.

When contacting local government, those with hearing difficulties have to use a relay service, as there are no TTY numbers. The Attleboro website advises that if assistive technology isn't compatible with the city's website, residents should contact the city to explain what kind of problem they have encountered, the preferred format, and desired webpage.¹⁴⁶

¹⁴⁶ <https://www.cityofattleboro.us/Accessibility>

The Taunton Consortium cannot devote any CDBG funds to making accessibility modifications to public facilities, as the Consortium only receives HOME funds that are specifically designated to address housing issues. Through HOME funding, the Consortium conducts rehab activities that can and do address the needs of handicapped individuals.

However, there are a number of eligible activities that can be funded through CDBG funds within the two Consortium cities that receive CDBG entitlement funding. Those activities could include handicap improvements to parks and recreation facilities, and to government offices and publicly utilized buildings. Maintaining accessible government facilities is essential to efforts to reduce segregation by increasing opportunities for people with disabilities to interact with individuals without disabilities, and to advance the economic empowerment of people with disabilities through employment opportunities and access to public benefits.

The City of Taunton has funded several projects in the past (and currently) to improve public access to buildings and spaces, such as installing handicap lifts and elevators at entrances to city buildings, installing a handicap access ramp to the local historical society building, creating and modifying public parks to accommodate people with disabilities, and making modifications to sidewalks and curb cuts to comply with ADA specifications, as well as providing job training and job search assistance to disabled citizens. The City of Attleboro has spent approximately \$500,000 over the past several years on access ramps, doors and sidewalks in and around City Hall and the public library.

Additionally, there may be some Consortium members that receive State Small Cities funding as recipients of federal CDBG funds given to the state. These individual communities may also address similar issues in their annual action plans and funding applications submitted to the state.

There is not a source of reliable data to determine whether towns and cities in the Taunton Consortium already have or are working toward substantial compliance with the ADA accessibility requirements for public infrastructure like sidewalks, pedestrian crossings, and pedestrian signals. Curb cuts are required by towns like Carver and Freetown, but a bare requirement does not speak toward the town's progress in realizing that goal. Attleboro has made accessibility modifications to its City Hall, streets, and sidewalks. The City of Taunton's website has the most extensive accessibility information, including a detailed survey of the accessibility features of municipal buildings and parking facilities, the further improvements needed, and estimated costs.

Transportation

With the exception of Freetown, all of the cities within the Taunton Regional Consortium are served by the Greater Attleboro Taunton Regional Transit Authority (GATRA). For both senior citizens and rider with disabilities, GATRA offers Dial-A-Ride serves that will provide door to door services as long as both the origin and destination are within three fourths of a mile from the GATRA bus service corridor.¹⁴⁷ In addition, all buses operated by GATRA are wheelchair

¹⁴⁷ <http://www.gatra.org/index.php/special-services/senior-disabled/>

accessible¹⁴⁸ and all drivers are trained in operating the wheelchair lifts.¹⁴⁹ GATRA also offers the Med Wheels program, which provides long distance transportation for seniors and those who are ADA eligible.¹⁵⁰ In response to complaints for lack of accessibility, the Mansfield MBTA (Massachusetts Bay Transportation Authority) train station is currently undergoing at \$7.5 million renovation to provide wheelchair ramps and other accommodations for those with disabilities.¹⁵¹ The project is slated to be completed by December 2019. As far as private transit services, accessible ridesharing services such as UberAssist and UberWav are not yet available in the area.

Proficient schools and educational programs

Children with disabilities are fairly evenly distributed across the Consortium, and the performance levels of schools tend to align closely with the population levels and relative wealth of an area. Schools in the rural eastern part of the Consortium do not perform as well as those near Attleboro, which have the advantage of the Providence commuter population and relative prosperity to go with it.

Using Individuals with Disabilities Education Act (IDEA) lawsuits and complaints to the Massachusetts Bureau of Special Education Appeals (BSEA) as a way to estimate the success of public education in the Consortium, it does not seem that there are widespread issues with the provision of a Free Appropriate Public Education (FAPE) to IDEA-classified children. There have only been three IDEA lawsuits against schools within the Taunton Consortium since the IDEA was passed. According to individual school reports, only four schools in the Consortium used restraint on students in the last year, and overall discipline of students with disabilities vs. students overall closely mirrored the national average.

Jobs

People with disabilities have fairly high employment levels, but low percentages in the labor force. According to the 2012-2016 American Community Survey 5-Year Estimates, 43.2% of noninstitutionalized people with disabilities age 16 and over in the Consortium were in the labor force with 81.38% employed. In the region, those figures are 42.04% and 79.39%, respectively. Although the American Community Survey does not facilitate the further disaggregation of this data by age and the elderly population is disproportionately comprised of people with disabilities, this data still shows a significant discrepancy. By contrast, 87.63% of noninstitutionalized people age 16 and over who do not have disabilities in the Taunton Consortium were in the labor force, with 94.17% employment. In the region, 85.57% of such individuals were in the labor force, and 93.07% are employed.

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

¹⁴⁸ <http://scituate.wickedlocal.com/news/20170118/gatra-adds-new-sloop-stops-in-north-scituate>

¹⁴⁹ <http://www.gatra.org/wp-content/uploads/GATRA-final-plan-without-appendices-reduced.pdf>

¹⁵⁰ <http://www.gatra.org/index.php/special-services/med-wheels/>

¹⁵¹ <https://turnto10.com/i-team/nbc-10-i-team-accessibility-concerns-at-mansfield-train-stop>

Government services and facilities

Multiple cities and towns in the Taunton Consortium have dedicated Commissions on Disability, and/or ADA Coordinators. Attleboro's mayor has just rejuvenated the city's disabilities council and substance-abuse council, filling the disabilities council with parents of children with disabilities, adults with disabilities, practitioners in the field, and a representative from the school department. The substance-abuse council gained two pharmacists, a substance abuse counselor, parents who lost a child to addiction, someone in recovery, three concerned citizens, a representative from the school department, and the DARE officer from the police department. The mayor stated that these qualifications far exceed anyone in the local government, and that their advisory role will be pivotal for these issues.¹⁵² Cities and towns in the Consortium also have an obligation to ensure the accessibility of government programs and activities. Information on requesting reasonable accommodations for such programs and activities is sorely lacking on local government websites.

With respect to slow response times for emergency services calls via relay service, the lack of accessibility at issue is not one that a reasonable accommodation or modification would be helpful to address. Instead, there is a need for the consistent and well-staffed implementation of existing policies and practices.

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Each city and town in the Consortium takes responsibility for the improvements to sidewalks, pedestrian crossings, and pedestrian signals. There does not seem to be any centralized portal to report sidewalk problems or other necessary infrastructure improvements. References to curb cuts on these government websites seem more focused on the permitting process for curb cuts on private driveways, rather than the accessibility of pedestrian crossings. Standardization of tracking and reporting across the Consortium could greatly improve efforts to move toward comprehensive accessibility.

Transportation

There is comprehensive accessibility information on GATRA's website, covering the provision of paratransit services, the accessibility of general bus service, and the procedure for filing complaints regarding Title VI and the ADA. The MBTA provides similar information and advises that accommodations requests be directed toward MBTA Customer Support. As with emergency response times, ensuring timely paratransit service is more a matter of investing adequately in the implementation of existing policies and practices rather than changing any existing neutral policies or practices.

Uber has a dedicated, easily findable Accessibility page on its website. The page describes the efforts that the company undertakes to serve people with disabilities. The site does not, however, inform users of how they can request accommodations and characterizes the obligation to

¹⁵² http://www.thesunchronicle.com/news/local_news/attleboro-mayor-moves-to-rejuvenate-dormant-advisory-boards/article_e8444ed3-a6cd-5b0c-be9d-174f1d6af2fc.html

comply with disability rights laws as falling on Uber drivers as independent contractors rather than on the company itself. Lyft does not have a dedicated page describing its efforts to ensure accessibility, instead burying what limited relevant information is on the company's website on multiple hard to find pages including its general anti-discrimination page and pages specific to service animals and wheelchairs. None of these pages outline how individuals should go about making accommodations requests.

Proficient schools and educational programs

The provision of adequate information on requesting reasonable accommodations varies wildly across the various school districts in the Consortium. For example, the Taunton School District has a dedicated webpage allowing people to request accommodation when it comes to the accessibility of the website, as well as file complaints relating to any discrimination in violation of Section 504 or the ADA.¹⁵³ The Seekonk School District directs that requests for accommodation be made in writing to the Director of Pupil Personnel Services or the Curriculum Coordinator.¹⁵⁴ The Plainville School District Special Education webpage directs parents to information on the school special education programs and on applicable laws and regulations, but doesn't clearly instruct parents how to request reasonable accommodations. The Attleboro School District website lacks a comparable webpage.

Jobs

Information on requesting reasonable accommodation in government employment applications is extremely uneven across the towns and cities of the Consortium. The dedicated personnel pages for the cities of Taunton and Attleboro both lack easily accessible information about how the human resources departments receive and process reasonable accommodation requests. The Carver government employment application refers to reasonable accommodation but does not give instructions as to how to apply for such accommodation. Employment applications for the town of Freetown instruct those requiring reasonable accommodation to notify the Board of Selectmen's Office. In stark contrast, the largest private sector employer in Taunton, General Dynamics Mission Systems, has a dedicated webpage with instructions for requesting special accommodations under the ADA, as well as additional resources on the company's equal opportunity, affirmative action, and diversity policies. The other top employers in the Consortium such as Medtronic, Hormel Foods, and Dupuy Inc. all provide similar information about requesting accommodation to prospective employees.

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

The American Community Survey does not disaggregate disability status by housing tenure. Accordingly, it is not possible to precisely determine the homeownership rate for people with disabilities. Additionally, this Assessment did not reveal any local studies on homeownership among people with disabilities or lending discrimination against people with disabilities in the

¹⁵³ <https://www.tauntonschools.org/websiteaccessibility.html>

¹⁵⁴ <http://www.seekonk.k12.ma.us/common/pages/DisplayFile.aspx?itemId=34691686>

Taunton Consortium or the broader region. Nonetheless, based on the age distribution of people with disabilities and the socioeconomic status of people with disabilities, two conclusions seem likely. First, it is unlikely that people with disabilities, overall, have significantly lower homeownership rates than the general public because people with disabilities are disproportionately elderly and homeownership rates are highest among elderly households. The Consortium even exhibits higher homeownership rates than the national average, with 78.6% of householders age 65 years and over are homeowners as opposed to 72.86% of householders under the age of 65. Second, among nonelderly people with disabilities, it is likely that homeownership is significantly lower than among nonelderly people who do not have disabilities because nonelderly people with disabilities are disproportionately low-income. Nationally, people with disabilities often face specific barriers in the mortgage lending process, including disparate treatment by mortgage brokers and failures to treat disability income as income.

Disproportionate Housing Needs

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

As with mortgage lending disparities, limited data is available on the extent to which people with disabilities face disproportionate housing needs. The American Community Survey does not disaggregate data relating to overcrowding, incomplete plumbing and kitchen facilities, and cost burden by disability status. Given the age distribution of people with disabilities, it would seem to be unlikely that people with disabilities are disproportionately subject to overcrowding. Only 0.4% of households with elderly heads of household are overcrowded while 1.4% of households with nonelderly heads of household are overcrowded. By contrast, in light of the relatively low earnings of people with disabilities, it is likely that people with disabilities are disproportionately subject to cost burden and severe cost burden.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting people with disabilities with other protected characteristics.

This Assessment has made extensive use of local data throughout the Disability and Access section. The sources of data other than HUD-provided data are noted where appropriate.

The program participant may also describe other information relevant to its assessment of disability and access issues.

The opioid crisis has hit Massachusetts and greater New England especially hard, and while some communities such as Fall River, New Bedford, and Taunton have managed to decrease the rate of opioid-related deaths, the statewide death and emergency rates still far outpace what it was even five years ago.¹⁵⁵ Taunton has a dedicated Taunton Police Opiate Outreach team.¹⁵⁶ In

¹⁵⁵ <http://www.tauntongazette.com/news/20180716/despise-narcan-opioid-overdoses-still-horrific-in-massachusetts>

¹⁵⁶ <http://www.tauntongazette.com/news/20180928/roundtable-devastating-toll-of-opioid-epidemic-in-taunton>

the past four years, the outreach team coordinator has visited 1,365 homes to offer referrals to support services provided by a team of nurses, social workers, teachers, family members of other people addicted to opioids, and survivors of overdoses.¹⁵⁷ There is some concern that the harm may outweigh the good when it comes to the widespread access to Narcan, an emergency overdose remedy.¹⁵⁸ Some worry that the knowledge that there is a failsafe solution makes opioid addicts more reckless in their usage, and that despite a reduction in fatal overdoses, the rate of drug usage is not declining.¹⁵⁹ At the state level, in the past three years the death rate for Latinos has doubled, growing at twice the rate of any other racial group.¹⁶⁰ Recent reporting suggests that the high Latino overdose rate is due to the language barrier when it comes to treatment and supportive services.¹⁶¹ Treatment options for Spanish-speaking patients are either not available, or not well advertised, such that people who need them cannot access them.¹⁶²

Disability and Access Issues Contributing Factors

- Access for persons with disabilities to proficient schools

There are 68 public schools within 15 public school districts in the Taunton Consortium.¹⁶³ There are also 39 private schools, including daycares. Analysis of these schools' performances in educating students with disabilities is based upon the performance of public schools, as only public schools are required to report such information.

The Massachusetts Department of Education compiles data about disability and student discipline in public schools. According to the National Center for Education Statistics, in the 2014-2015 school year, the average percentage of IDEA-classified students enrolled in any given public school was 13%.¹⁶⁴ The most recent statistic for Taunton Consortium public schools places IDEA-enrollment at 19%, with only three schools falling below 10% IDEA-enrollment (8.9%, 9.7%, and 9.9%).¹⁶⁵ This consistent percentage does not raise any red flags that Taunton-area public schools might be failing in their Child Find obligations or pushing out students with disabilities. A comparison of the percentage of IDEA students enrolled at large versus the percentage of disciplined students who were also IDEA-classified shows that students with disabilities are punished at approximately twice the rate as other students. Although troubling, this is also consistent with the national average.¹⁶⁶

¹⁵⁷ *Id.*

¹⁵⁸ <http://www.tauntongazette.com/news/20180716/despite-narcan-opioid-overdoses-still-horrific-in-massachusetts>

¹⁵⁹ *Id.*

¹⁶⁰ <http://www.wbur.org/commonhealth/2018/05/03/latino-opioid-overdose-deaths>

¹⁶¹ *Id.*

¹⁶² *Id.*

¹⁶³ Attleboro, Berkley, Bridgetown-Raynham, Bristol County Agricultural, Bristol-Plymouth Regional Vocational Technical, Carver, Dighton-Rehoboth, Freetown-Lakeville, Mansfield, Middleborough, North Attleboro, Norton, Plainville, Seekonk, Taunton

¹⁶⁴ https://nces.ed.gov/programs/coe/indicator_cgg.asp.

¹⁶⁵ The statistic is somewhat influenced by two special needs preschools with majority-IDEA enrollment.

¹⁶⁶ <http://blogs.edweek.org/edweek/rulesforengagement/CRDC%20School%20Discipline%20Snapshot.pdf>.

“Students with disabilities are more than twice as likely to receive an out-of-school suspension (13%) than students without disabilities (6%).” *Id.*

The Massachusetts Bureau of Special Education Appeals (BSEA) handles mediations, advisory opinions, and due process hearings to resolve disputes between parents and schools regarding special education. BSEA decisions can also be appealed to U.S. District Court. The Massachusetts Department of Education does not detail school-specific statistics, but overall, it appears that the BSEA is truly a forum of last resort; each year since 2007, the BSEA has issued 52 decisions or less for the entire state. There have only been three IDEA lawsuits against Taunton Consortium public schools since the passage of the IDEA – two against Plainville Public Schools (2005, 2012), and one against North Attleboro Public Schools (2013). Massachusetts has also launched SpedEx, a dispute resolution option for situations wherein an Individualized Education Program (IEP) has been rejected or a mediation or hearing request has been filed. SpedEx appoints an independent SpedEx Consultant to facilitate a joint parent-school final resolution, and is an on-going experimental project limited to eight cases a year. Another measure for special education performance is the use of restraint on students. Only four schools in the Taunton Consortium used restraint in the last year, with zero reported injuries. Cyril K. Brennan Middle School in Attleboro used restraint a total of 30 times on 6 children. Community Public School in North Attleboro used restraint 30 times on 10 children. John C. Chamberlain Elementary School in Taunton used restraint 53 times on 18 children. East Taunton Elementary School used restraint 11 times on 6 children. The disability enrollment of these schools isn't out of the ordinary, ranging from 15-30%. However, notably, at John C. Chamberlain Elementary School, 9 out of the 13 children (69%) disciplined in the last year were IDEA-classified children.

Massachusetts public schools routinely conduct Coordinated Program Review reports, evaluating compliance with requirements regarding special education,¹⁶⁷ civil rights methods of administration and other general education requirements,¹⁶⁸ English learner education,¹⁶⁹ and career/vocational technical education.¹⁷⁰ Overall, the Taunton Consortium schools perform quite well, with an average of only six measurements either “partially implemented” or “not implemented.” Middleboro, Taunton, and Freetown-Lakeville had the highest violations (10, 11, and 13, respectively).¹⁷¹ Substantively, one of the most frequent special education violations concerned the location and/or quality of dedicated special education rooms. The lack of an integrated learning setting was observed in Carver, Middleboro, Norton, Plainville, Seekonk, and Taunton schools. In some instances, special education services were even conducted in a hallway or on an auditorium stage. Seekonk, Plainville, and Bristol-Plymouth Vocational Tech. also encountered problems fully addressing the needs of autistic children in their IEPs, especially concerning bullying. Attleboro Public Schools found that for at least 17 students, only 50% of their required speech and language services were being provided. Bristol-Plymouth Regional Vocational Tech. found deficiencies in the proper administration of physical restraint.

- Access to publicly supported housing for persons with disabilities

¹⁶⁷ 59 metrics

¹⁶⁸ 26 metrics

¹⁶⁹ 18 metrics

¹⁷⁰ 25 metrics

¹⁷¹ Discounting Dighton-Rehoboth (13) and Bristol-Plymouth Vocational Tech. (11) because their numbers were amplified by career/vocational technical education requirements which were not included in the other reports.

Access to publicly supported housing for persons with disabilities is a significant contributing factor. The Taunton Consortium has housing authorities in Attleboro, Carver, Dighton, Freetown, Mansfield, Middleboro, North Attleboro, Norton, Plainville, Raynham, Seekonk, and Taunton. Together, these twelve housing authorities implement the Public Housing, Project-Based Section 8, and Section 8 programs. Eligibility standards for the Section 8 and Public Housing programs are set by HUD. Massachusetts employs a statewide application process, the Common Housing Application for Massachusetts Public Housing (CHAMP). Massachusetts also uses a statewide Centralized Waiting List for Section 8 recipients. Veterans and local residents receive publicly supported housing assignment priority, and often disabled housing is combined with elderly housing, due to the high percentage of elderly residents who also have some sort of ambulatory or independent living disability. Nevertheless, this contributes to the segregation of persons with disabilities.

Listings of public housing options are accessible on each of the Housing Authorities' websites. However, traditional public housing is only available in Taunton; other sites in Middleboro, Taunton, Attleboro, etc. are Project-Based Section 8 buildings. Of the two public housing buildings in Taunton, by far the larger one, Cedarvale Apartments (403 units), was built in the 1960s. While subject to Section 504 retrofitting, it was certainly not built up to federal accessibility standards.

People seeking housing that is accessible to those with disabilities face significant challenges both because of the number of accessible options and because of the lack of information addressing accessibility. Especially when selecting a Section 8 unit, only a few apartment-listing websites can be consistently relied upon to list whether a property is accessible. This forces apartment-searchers to make individual inquiries, making it much more time-consuming. It also makes it difficult to estimate the number of disability-accessible properties in the area.

- Access to Transportation for Persons with Disabilities

There are 12 towns¹⁷² and two cities¹⁷³ in the Taunton Consortium. Bus service is provided by the Greater Attleboro Taunton Regional Transit Authority (GATRA), which services each of the towns and cities in the Taunton Consortium (except Freetown), in addition to 15 other municipalities. GATRA provides Dial-A-Ride services for seniors and people with disabilities in all 28 GATRA-member communities. GATRA also provides shuttle services to Massachusetts Bay Transportation Authority (MBTA) commuter rail stations in Norton, Mansfield, and Middleborough within the Taunton Consortium in addition to other locations.

Qualifying individuals who are 60 or older or have a disability can get a Statewide Access Pass, which allows them half-fare discounts on all public fixed-route transportation in Massachusetts, including GATRA buses and commuter rails (e.g. MBTA). They must complete a two-part ADA application, and a licensed professional who can verify the individual's disability must sign the second section. In lieu of a licensed professional consultation, applicants may use a Medicare card, a letter signed by an administration from the VA office confirming the disability is 70% or

¹⁷² Berkley, Carver, Dighton, Freetown, Lakeville, Mansfield, Middleborough, North Attleboro, Norton, Plainville, Raynham, and Seekonk

¹⁷³ Taunton and Attleboro

greater, or a Social Security letter affirming eligibility. Seniors need only fill out a one-page application and show proof of their date of birth.

Seniors and people with disabilities are also eligible for curb-to-curb Dial-A-Ride paratransit service through GATRA. Depending on the location, reservations can be booked through the GATRA office, the Council on Aging, or a local provider. Those who require assistance to and from the vehicle may bring an aide as part of the Dial-A-Ride fare. Participants can purchase a 10 ride one-way Dial-A-Ride pass for \$10 at GATRA stations or by mail. Neither regular bus service nor Dial-A-Ride is offered on Sundays. All GATRA buses are wheelchair accessible and equipped with lifts. They all allow service animals. GATRA buses operate under a “flag stop” system, in which a vehicle may be hailed by waving at any point along its route. Similarly, disembarking passengers may pull the cord onboard to signal a stop. Designated stops are announced by the automated system to alert passengers with visual impairments.

MBTA Commuter Trains have stations in Middleborough/Lakeville, South Attleboro, Attleboro, and Mansfield, and the lines end in Providence and Boston. MBTA commuter trains are wheelchair accessible, have onboard audio stop announcements, and allow service animals. All Taunton-area commuter rail stations are wheelchair accessible, but not all MBTA rail stations are, which may pose problems for some handicapped passengers, depending on their destinations. Some commuter rail stations are designated “flag stops” (the train will not automatically stop), so riders must inform the conductor beforehand. Paratransit from Taunton-area MBTA stations is provided by GATRA, and THE RIDE paratransit covers most Boston-area MBTA stations. Seniors and people with disabilities are eligible for reduced fares, and people with low vision are eligible for free service on MBTA.

The United Way of Greater Attleboro/Taunton provides a shared long-distance medical transportation program, called MedWheels, for seniors or people with disabilities who have exhausted their transportation options. A 48-hour advanced notice is required, and a donation of \$10 is requested. Taunton seniors can also get free to-and-from transportation from area housing complexes in Taunton to Trucchi’s Supermarket on Wednesday mornings. GATRA, in collaboration with other Massachusetts Regional Transit Authorities, sponsors a transportation website called Ride Match to match rides with area transportation providers. The portal hosts a multitude of specialized transportation options. The portal allows passengers to customize searches based on disability, senior, student, veteran, or other status, as well as location, time, date, and purpose.

- Inaccessible Government Facilities or Services

Inaccessible government facilities or services is a major contributing factor for segregation of people with disabilities. Libraries often offer a wealth of accessibility tools and services such as large screen monitors, large print keyboards, trackball mice, 20/20 pens, signature guides, 3x handheld magnifiers, Zoom Text, NVDA Text-to-Speech, etc.,. However, if these resources are available at libraries in the Consortium, they are not well advertised. Libraries may also offer accessibility resources and services, including reading programs, delivery services (for homebound readers), special collections of books (about, for example, teens with disabilities), job search resources for people with disabilities, lists of community resources, an Information and Assistance (I&A) helpline, or braille and digital talking books exchange. Again, if these are

available, they are not well advertised. The availability of these tools, resources, and services can be instrumental in effective integrated and supportive living for people with disabilities.

The technological accessibility of the city and town governments are also lacking. Only the City of Attleboro's website has a dedicated accessibility page. A state goal of Middleboro's Fiscal Year 2018 Strategic Plan is to update the accessibility of the Town website. Every other town and city's website is silent on the matter. There is also a nearly complete lack of TTY numbers (for deaf or hard of hearing people) listed on any of the government websites for towns and cities in the Consortium. In the absence of TTY numbers, deaf and hearing-impaired people can use Telecommunications Relay Service by dialing 711 or the MassRelay service or use Internet Protocol Relay Service with any internet connection. The relay service will then contact the recipient through the regular telephone network and relay the message back and forth between the parties. Predictably, this is much more time consuming than TTY. In lieu of obtaining TTY equipment, municipalities could consider a live chat option on their websites, which would function similarly and allow deaf and hearing-impaired people to contact governments simply by using an internet connection.

The towns and cities of the Consortium are also lacking in posted ADA Transition Plans for the public's perusal. The most comprehensive ADA Transition materials can be found on the City of Taunton's website, which lays out plans for municipal buildings, parking, parks, polling, public safety, and schools. These plans are in searchable pdf format, another important accommodation for people with low vision. However, there are still many plans posted by town and city websites in the Consortium that are not in searchable pdf format, making them far less accessible for people with low vision.

- Inaccessible Public or Private Infrastructure

Inaccessible public or private infrastructure is a major contributing factor to segregation of people with disabilities. There is very little reporting on how widespread ADA compliance issues such as curb cuts and accessible building modifications are within the Consortium. Although the City of Taunton has a very comprehensive and public set of plans regarding the accessibility of municipal buildings, parking, parks, polling, public safety, and schools, other municipalities are sorely lacking.

One important factor in infrastructure accessibility is the availability of curb cuts at pedestrian crossings. References to curb cuts on municipal websites focuses on the permitting process in private construction, namely new house and driveway construction. There are almost no references to curb cuts from an accessibility perspective. One notable exception is Dighton, which has an online portal to report potholes "or other street-related concern[s]."¹⁷⁴

There have been several ADA accessibility complaints against the City of Taunton across the years. In 2001, a case was filed alleging ADA noncompliance over the accessibility at the Bristol County Registry of Deeds and courthouses.¹⁷⁵ As a result, the facilities underwent extensive renovations and the Taunton District Court was temporarily closed until a new, compliant

¹⁷⁴ http://dighton-ma.gov/i_want_to/report_a_pothole.php

¹⁷⁵ <http://www.tauntongazette.com/x726715865/Attorney-Some-new-Taunton-sidewalks-lack-ADA-compliance>

courthouse could be opened.¹⁷⁶ An ADA lawsuit was filed against the City of Taunton in 2011, citing a lack of accessible sidewalks.¹⁷⁷ In 2015, with the same lawsuit yet to be settled, the attorney who brought the case opined that it was ironic the city had managed road repavement “without touching sidewalks.”¹⁷⁸ The attorney, a wheelchair-user himself, was also underwhelmed with Taunton’s ADA transition plan, which also did not address the sidewalks.¹⁷⁹

- Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is discussed in more detail in the Disparities in Access to Opportunity section. It is not a significant contributing factor Disability and Access in the Consortium.

- Lack of Affordable In-Home or Community-Based Supportive Services

Lack of affordable in-home or community-based supportive services is not a significant contributing factor to the segregation of persons with disabilities in the Consortium, as well as regionally. It is difficult to measure the need currently going unmet for intensive, community-based supportive services because the Commonwealth of Massachusetts does not maintain waiting lists for Medicaid Waivers and State Plan services for persons with developmental disabilities and psychiatric disabilities. Since waiver services, including the Money Follows the Person Waiver, can be applied for at any time, it does not appear that an inability to access these services is a primary cause of segregation. In theory, there is not an unlimited appropriation for these community-based supportive services, so, if a surge in individuals seeking to leave institutional and other congregate settings applied for services, the Commonwealth might reach a point at which it would not be able to serve every applicant in need. For the time being, other impediments to individuals who need supportive services being in a position to apply, such as a lack of housing, appear to be more significant drivers of segregation.

- Lack of Affordable, Accessible Housing in Range of Unit Sizes

The lack of affordable, accessible housing in a range of unit sizes is a contributing factor. Persons with disabilities in the Consortium disproportionately have low incomes and live in poverty, thus increasing their relative need for affordable housing. While 6.3% of individuals in the Consortium who do not have disabilities have incomes below the federal poverty line, 17.4% of persons with a disability have incomes below the federal poverty line. The median earnings for individuals without disabilities in the Consortium is \$42,836 compared to \$26,864 for persons with disabilities. In light of the broader affordable housing shortage in the Consortium and the region, there is certainly a shortage for persons with disabilities.

The fact that much of the affordable housing that exists, particularly older units and developments, is not accessible, further compounds the effects that the lack of housing for persons with disabilities who need accessibility features has. While the majority of LIHTC units

¹⁷⁶ *Id.*

¹⁷⁷ <http://www.tauntongazette.com/x517525670/Taunton-faces-federal-lawsuit>

¹⁷⁸ <http://www.patriotledger.com/article/20150718/news/150716696>

¹⁷⁹ *Id.*

in the area were put into service from 1991-onward, other publicly supported housing options vary greatly in age and accessibility. Nevertheless, publicly supported housing is subject to the modification requirements of Section 504 of the Rehabilitation Act. New affordable, multifamily units – those that are most likely to be both affordable and accessible – are too few in number to meet the total need.

Lastly, supportive housing developments often consist primarily or exclusively of one-bedroom apartments. The clear majority of Public Housing (84.91%) and Project-Based Section 8 (69.95%) units have only 0 or 1 bedrooms. Although the need for supportive housing for persons with disabilities likely consists primarily of a need for one-bedroom units, there are individuals at risk of institutionalization who have dependent children and persons with disabilities who need a live-in aide with their own bedroom. Including a mix of a small number of two- and even three-bedroom units in developments with a supportive housing component would foster greater community integration.

The dearth of affordable, accessible housing in a range of unit sizes exacerbates two fair housing issues. First, when individuals with disabilities are not able to secure such housing, the alternative may be segregation in congregate settings like nursing homes and group homes. Second, if low-income persons with disabilities have to navigate the private market in order to obtain housing with the accessibility features they need, they may incur the disproportionate housing need of elevated cost burden as a result.

- Lack of Affordable, Integrated Housing for Individuals Who Need Supportive Services

According to Massachusetts's Draft Olmstead Plan, investments in affordable housing, community-based services, and community-integrated employment and workforce development from 2008-2017 have shown great results. Programs such as the Facilities Consolidation Fund, Community Based Housing program, 811 Project Rental Assistance, DMH/DDS MassHousing 3% Priority Program, and DMH Rental Subsidy Program have been identified as critical to servicing populations at risk of institutionalization. HUD 811 Project Rental Assistance, for example, is used to transition MassHealth members from institutions back into the community. The Administration has pledged to support new bond bills that will fund supportive and affordable housing programs and have developed a five-year bond plan including \$1.1 billion pledged toward affordable housing programs, including, specifically, supportive housing. MassHealth has also made plans to expand coverage for substance abuse disorder to include 24-hour community-based rehab services; the program will increase its spending by \$200 million over the next five years. DMH has made plans to establish State Hospital Discharge Review team, in order to collaborate with the patient and facilitate a smooth transition back into the community. Massachusetts has proposed a wealth of other strategies in its Draft Olmstead Plan, including employment strategies for people with disabilities, resources for formerly incarcerated individuals, and improving building accessibility.¹⁸⁰

¹⁸⁰ <https://www.mass.gov/files/documents/2018/03/14/draft-olmstead-plan.pdf>

On the local level, PHAs could institute an HCV preference for those transitioning out of an institutionalized setting. The Attleboro PHA does not have such a stated preference, and other PHA's in the area are even less forthcoming about their internal policies.

- Lack of Assistance for Housing Accessibility Modifications

Lack of assistance of housing accessibility modifications is a significant contributing factor to segregation for persons with disabilities in the Consortium and within Taunton specifically. Although the City of Taunton allocates both CDBG and HOME funds to the rehabilitation of owner-occupied single-family homes, which may include, in some instances, accessibility modifications, it does not target funds specifically for accessibility modifications. Additionally, no source of funds is available for modifications to inaccessible rental dwellings. Because of the very old housing stock in the City of Taunton, naturally occurring affordable housing or so-called market-affordable housing, which is often the housing most available to Housing Choice Voucher holders, is unlikely to be accessible, absent modifications. For persons with ambulatory disabilities, in particular, the inability to make an accessibility modification can often be the barrier that gives them no option except for a nursing home or that makes discharge from a nursing home more difficult.

- Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing

Lack of assistance for transitioning from institutional settings to integrated housing is a significant contributing factor to the segregation of persons with disabilities in the Consortium as well as regionally. Although Massachusetts is a national leader in the production of permanent supportive housing for persons with disabilities and has made more progress than most states in closing large institutions, the Commonwealth does not appear to have sufficient systems in place to assist people leaving remaining congregate settings, primarily nursing homes, in actually accessing the affordable, permanent supportive housing that exists. Specifically, although the Massachusetts Department of Public Health provides housing search assistance for individuals with HIV, that service is not made available more broadly to persons with developmental disabilities and psychiatric disabilities who may also be at risk of institutionalization. The Commonwealth may be the logical entity to address that gap, but there is also a need for security deposit assistance for individuals with disabilities who are leaving nursing homes. This is an area where the Consortium can play a role. Given the regionalized delivery of services, particularly for people with developmental disabilities, a coordinated effort in which the Consortium provides funding for security deposit assistance to individuals served by the Department of Developmental Services who are leaving nursing homes or adult group homes to live in independent apartments could be beneficial. Local nonprofit groups such as CCBC and Catholic Social Services provide transitional housing and services to individuals being released from either correctional institutions or drug and alcohol programs to help reintegrate them into society. There is certainly an overlap between these independent programs and transitional housing for individuals with disabilities, and any comprehensive effort to coordinate provision of these services should include such nonprofit groups as well.

- Lack of local or regional cooperation

Lack of local or regional cooperation is discussed in more detail in the Segregation section. Lack of local or regional cooperation is a significant contributing factor to Disability and Access in the Consortium as well as regionally.

- Land use and zoning laws

Land use and zoning is discussed in more detail in the Segregation section. It is a significant contributing factor to Disability and Access.

- Lending discrimination

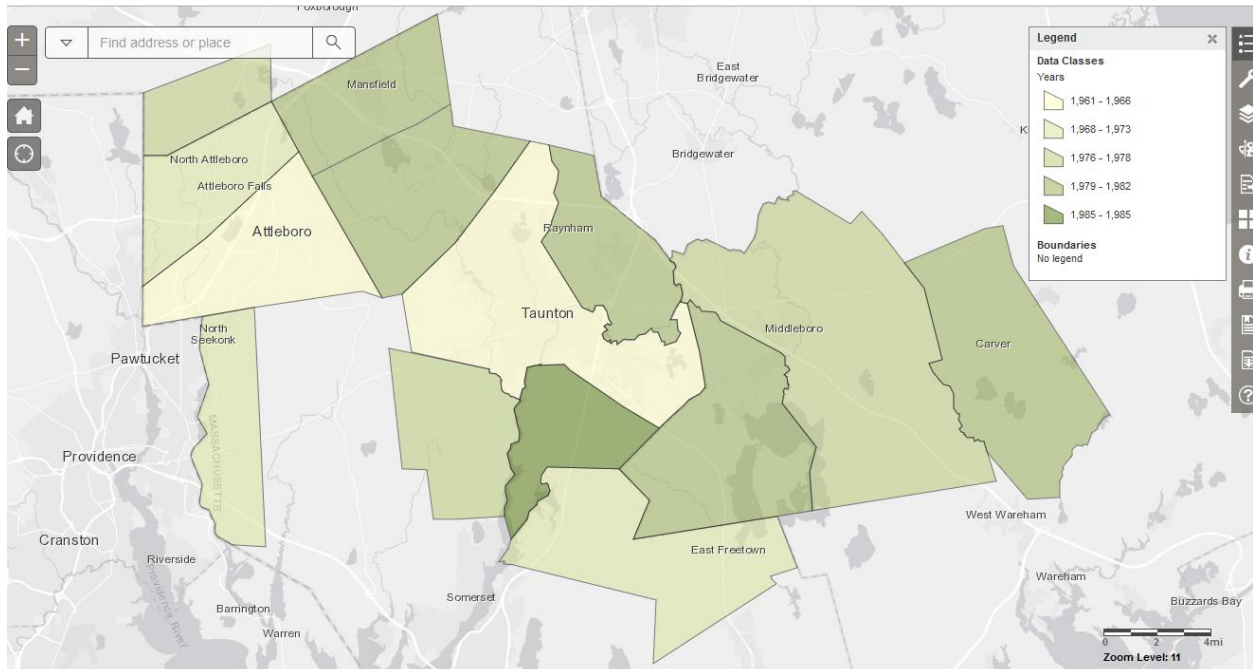
Lending discrimination is discussed in more detail in the Segregation section. Lending discrimination is a significant contributing factor to segregation, disparities in access to opportunity, and disproportionate housing needs in the Consortium and those fair housing issues along with R/ECAPs in the custom region and the Providence-Warwick, RI-MA Metropolitan Statistical Area.

- Location of Accessible Housing

The location of accessible housing is not a significant contributing factor to fair housing issues in the Taunton Consortium. Although it is not possible to precisely map the location of accessible housing in the Consortium, it tends to exist where there are concentrations of new, multifamily housing and where there are concentrations of publicly supported housing. These dimensions cut in somewhat contradictory directions. The American Community Survey does not facilitate the disaggregation of housing units by units in structure and year structure built together but does allow a look at those two data points separately. As the maps below reflect, there is some clear overlap between the areas with the most multifamily housing (namely, Taunton and Attleboro) and the areas with the most publicly supported housing. The maps indicating the median age of structure tells a contradictory story, but these maps are likely skewed by the relative age of inner city, historic buildings in the traditional population centers of Taunton and Attleboro, as opposed to the suburban character and relative youth of the surrounding communities.

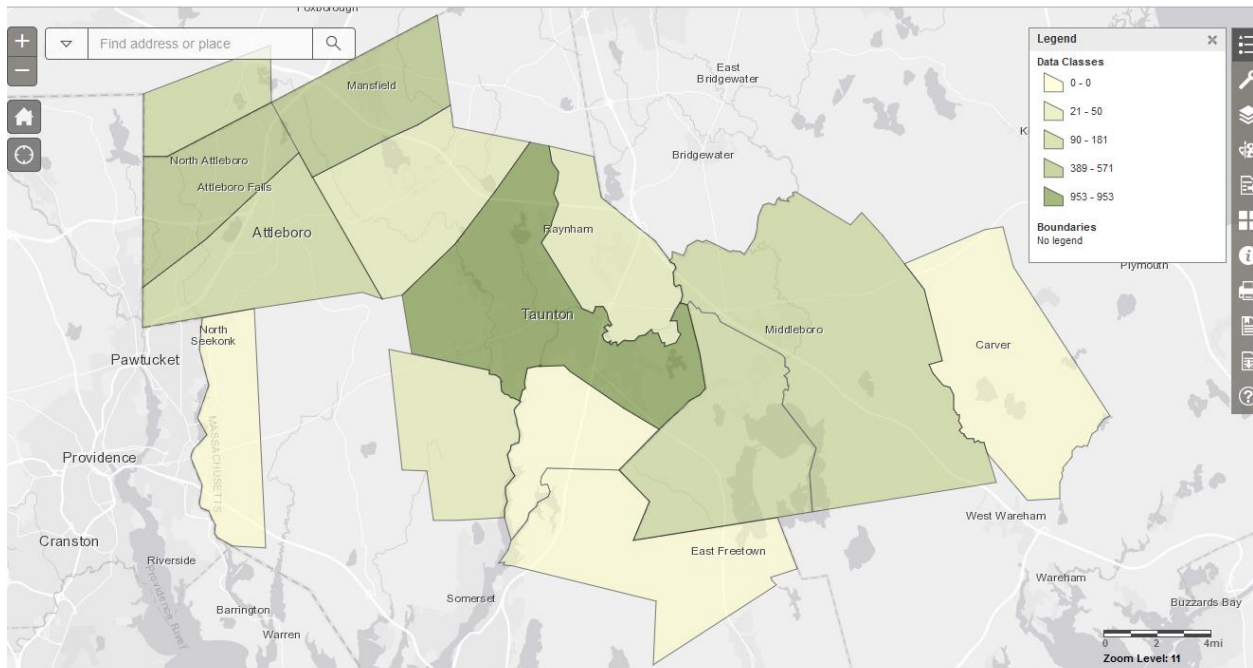
Map 10: Median Year Structure Built, Taunton Consortium

Thematic Map of Estimate: Median year structure built
Geography: by County Subdivision



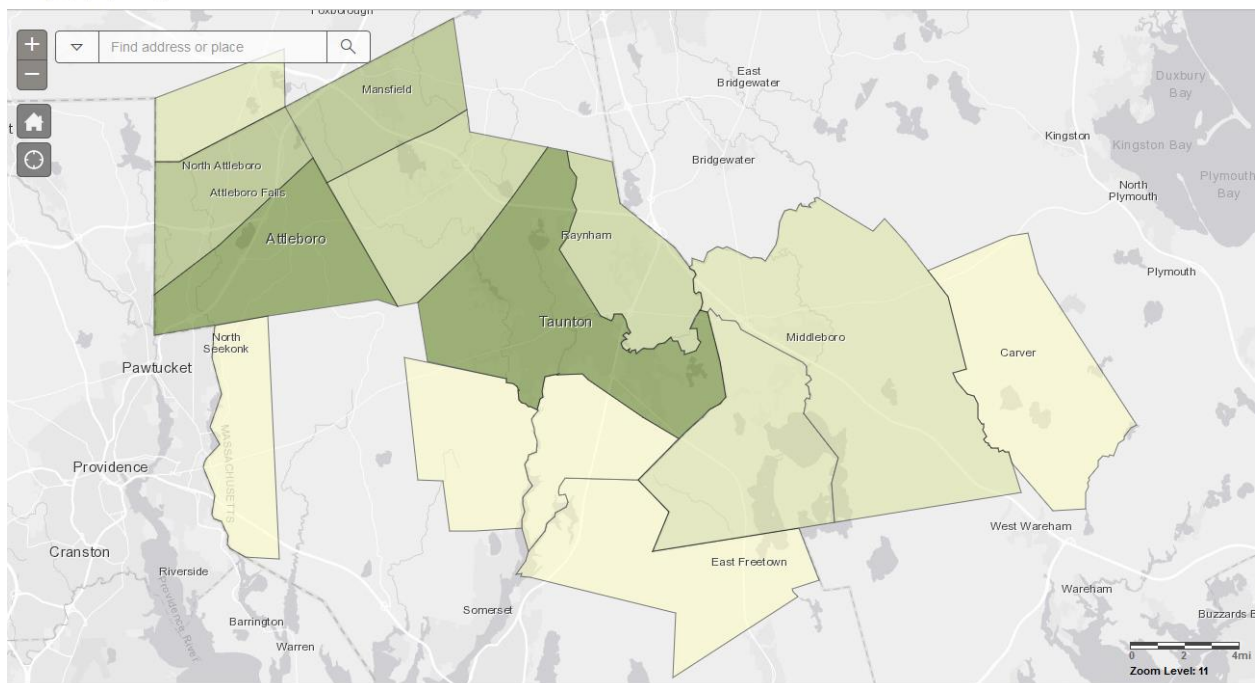
Map 11: Units in Structure (20-49), Taunton Consortium

Thematic Map of Estimate: Total - 20 to 49
Geography: by County Subdivision



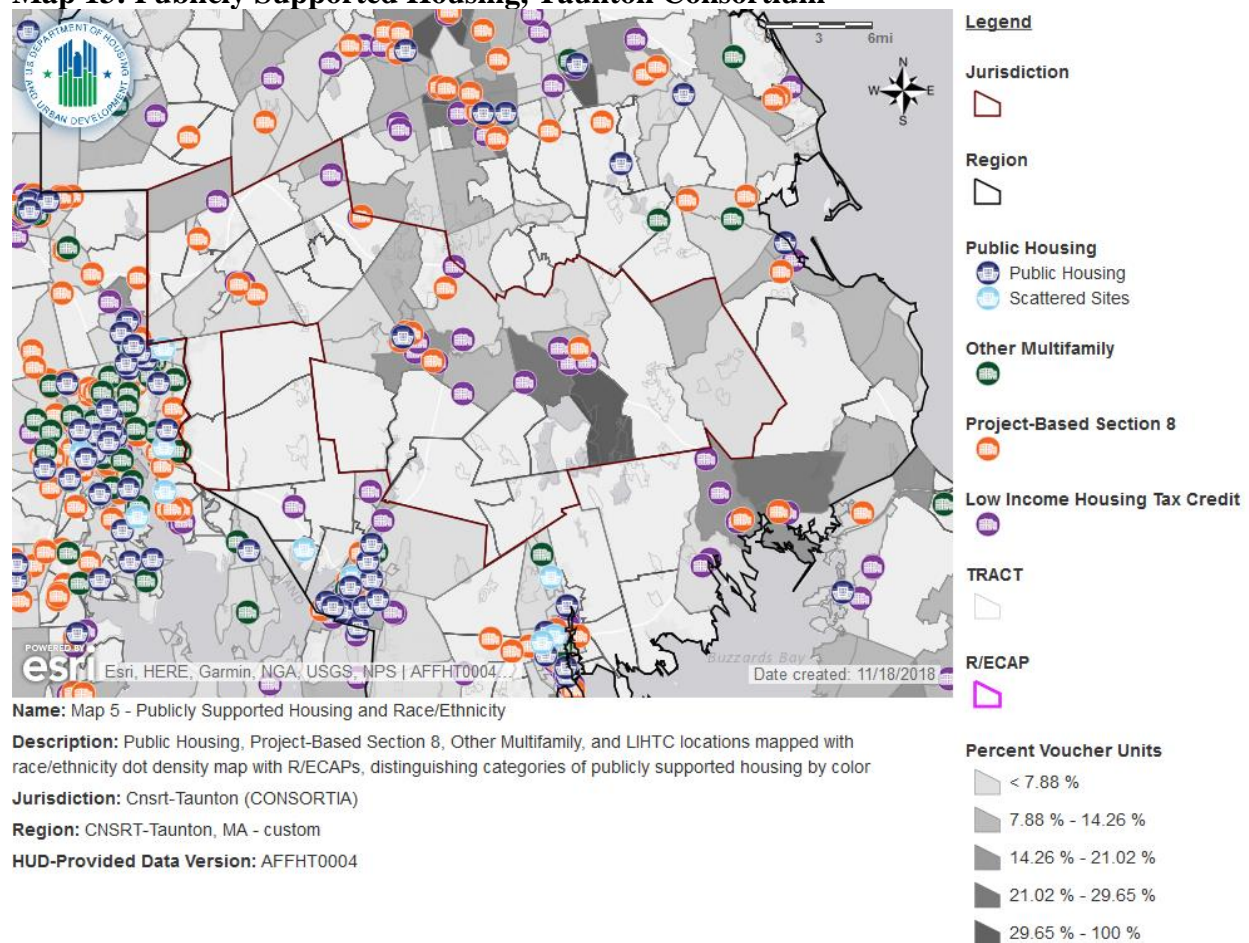
Map 12: Units in Structure (50+), Taunton Consortium

Thematic Map of Estimate; Total: - 50 or more
Geography: by County Subdivision



Publicly supported housing, as reflected in the map below, is highly concentrated in Taunton, Attleboro, and Middleboro. Some publicly supported housing in the more northern parts of the Consortium are located in high opportunity areas. The relative youth of these buildings and the fact that all publicly supported housing is subject to Section 504 mean that there are fairly widespread and accessible choices, albeit heavily concentrated in population centers. When affordability is not factored into the equation, the location of accessible housing does not appear to significantly contribute to fair housing issues, where it is especially clear that the high opportunity areas to the north have a young housing stock with a decent percentage of multifamily units.

Map 13: Publicly Supported Housing, Taunton Consortium



- Loss of Affordable Housing

Loss of affordable housing is discussed in more detail in the Segregation section. Loss of affordable housing is a significant contributing factor Disability and Access.

- Occupancy codes and restrictions

Occupancy codes and restrictions are discussed in more detail in the Segregation section. It is not a significant contributing factor to Disability and Access.

- Source of income discrimination

Source of income discrimination is discussed in greater detail in the Segregation section. Source of income discrimination is not a major contributing factor to Disability and Access, since source of income discrimination is illegal.

- Regulatory Barriers to Providing Housing and Supportive Services for Persons with Disabilities

Regulatory barriers to providing housing and supportive services for persons with disabilities are a contributing factor to the segregation of persons with disabilities in Taunton and the Consortium. Group homes are not a permitted use in any zoning district in the City of Taunton and are a prohibited use in the two least dense residential zoning districts. The prohibition on group homes in certain zoning districts raises serious fair housing concerns, and the City must consider allowing group homes as a reasonable accommodation if requested. The Town of Middleborough also poses regulatory barriers to housing for persons with disabilities. Although it does not target group homes directly in its ordinance, that town and North Attleboro have adopted a restrictive definition of the term “family” for purposes of determining permitted uses in residential zones. Only up to four unrelated adults can reside in a unit together. Norton and Attleboro, by contrast, does not specifically target group homes in its zoning ordinance, and their definitions of the term “family” allows up to six and seven unrelated adults respectively, striking a much more reasonable balance. Mansfield uses the same maximum of unrelated persons but includes an exception for group homes recognizes by the Commonwealth of Massachusetts.

Although this exception should be broader, it is consistent with the broader need for flexibility and accommodations when necessary to afford equal opportunity to persons with disabilities. In Dighton, there is neither targeted adverse treatment of group homes nor a restrictive definition of the term “family,” but there is a risk of the improper characterization of group homes as “boarding houses,” which are prohibited in residential districts. Freetown has even broader restrictions against “rooming houses,” which are not defined, that could adversely affect persons with disabilities if misapplied. North Attleboro’s definition of boarding houses, helpfully, supports the conclusion that group homes are not within its scope. Raynham does not cap the number of unrelated persons in a family, and its definition of boarding houses is even more tailored than that of Mansfield to avoid confusion about coverage of group homes. Seekonk has an overly restrictive definition of the term “family” as well as an overly broad definition of “boarding houses.” The Consortium members not discussed with respect to this contributing factor do not currently impose any zoning barriers with respect to group homes. Although group homes are no longer the preferred means of achieving community integration for persons with disabilities, they are a more integrated option than nursing homes and other institutions, and it is always inappropriate to specifically single out persons with disabilities for adverse treatment.

- State or local laws, policies, or practices that discourage or prohibit individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings

In Massachusetts, receipt of medical assistance and social programs are not conditioned upon residence in an institutional or other segregated setting. Inasmuch as state or local laws, policies, or practices affect the availability of supportive services, affordable and accessible housing, transportation, education, or jobs, these issues have been addressed specifically by other contributing factors.

- Other

N/A

V. FAIR HOUSING ANALYSIS

E. Fair Housing Enforcement, Outreach Capacity and Resources

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

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

J & R Associates

The North Attleboro-based company, J & R Associates, has been the subject of a Consent Decree in 2015 and a separate Settlement Agreement in 2017 for alleged violations of the Fair Housing Act.

The 2015 Consent Decree concerned DOJ testing that suggested J & R Associates had a policy of excluding families with children from particular buildings, and/or units, and for maintaining adult-only buildings, floors, and/or units, constituting discrimination based on familial status. Without admitting guilt, J & R Associates agreed to implement a Nondiscrimination Policy, with required trainings of new employees on the policy. All prospective tenants shall have “Guest Card” records and phone logs. J & R Associates also agreed to maintain an availability list and waiting lists, and process rental applications on a nondiscriminatory basis. J & R also paid \$135,000 and agreed to allow the DOJ to monitor its performance, both publicly and through undercover testing.

In 2017, J & R Associates settled a second case, this time concerning race and national origin discrimination in violation of the Fair Housing Act. The DOJ alleged that J & R Associates steered South Asian applicants to buildings 7 and 8 of its apartment complexes from 2009-2014, constituting a pattern or practice of discrimination based on national origin or race. The terms of the settlement were similar to the previous Consent Decree, which remained in place. J & R Associates was subject to recordkeeping and monitoring by the DOJ, but publicly and through undercover testing. Employees were subject to mandatory nondiscrimination training. J & R Associates also paid \$70,000 in compensation to aggrieved persons.

Massachusetts Office of the Attorney General

This year, the AG's Office settled a source of income discrimination case based on a complaint filed with the Massachusetts Commission Against Discrimination.¹⁸¹ The complaint's events took place in April 2016, when a Taunton area apartment company, Realty Executives Metro South, informed a prospective tenant that the duplex was "not approved for Section 8."¹⁸² The defendants paid \$10,000 to the victim, submitted policies and procedures to the AG's Office for review, and underwent special fair housing training.¹⁸³

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

Massachusetts General Laws Chapter 151B: Unlawful Discrimination Because of Race, Color, Religious Creed, National Origin, Ancestry, or Sex

In addition to the Federal Fair Housing Act, Massachusetts state law protects against housing discrimination on the basis of race, color, religious creed, national origin, sex, age, ancestry, genetic information, veteran status, sexual orientation, marital status, children, handicap, and receipt of public assistance or housing subsidy in the selling, renting, or leasing of housing accommodations, commercial space, or land intended for use as such.¹⁸⁴

According to the nonprofit SouthCoast Fair Housing,¹⁸⁵ examples of illegal housing discrimination include:

- Stating "I don't take Section 8."
- Steering renters or buyers to certain neighborhoods due to their race or national origin.
- Refusing to rent to someone with children under six because there is lead in the apartment.
- Hearing a potential renter's accent and then telling them the apartment is no longer available when it actually is.
- Refusing to allow a person with a disability to have a service animal because of a "no pets" policy.
- Giving applicants different rental terms due to a protected basis
- Evicting a tenant because of the race of his or her guests.
- Discriminating against voucher holders - placing them on the waiting list or shutting them out entirely.

Massachusetts General Laws Chapter 186, Section 24: Termination of rental agreement or tenancy by victim of domestic violence, rape, sexual assault or stalking

¹⁸¹ <http://www.tauntongazette.com/news/20181010/ag-healey-announces-fair-housing-settlement-in-taunton>

¹⁸² *Id.*

¹⁸³ *Id.*

¹⁸⁴ M.G.L. c. 151B.

¹⁸⁵ <http://southcoastfairhousing.org/about/>

Massachusetts state law protects victims of domestic violence, rape, sexual assault, or stalking by allowing them to terminate their rental agreement or tenancy in any housing, public or private.¹⁸⁶ This law fills an important gap left by other fair housing laws by accounting for a change of circumstances that might compel someone to seek different housing accommodations for their own safety. This measure provides a safety feature that protects victims from the adverse consequences of violating their rental agreement, while also promoting overall public safety by allowing people to get out of compromising situations.

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.

SouthCoast Fair Housing

SouthCoast Fair Housing is a nonprofit fair housing organization with offices in New Bedford, MA and Pawtucket, RI. It services Rhode Island, as well as the Massachusetts counties of Plymouth and Bristol. The organization conducts fair housing testing, publishes fair housing resource guides, and evaluates internal housing discrimination complaints for meritorious claims and assists victims in filing official housing discrimination complaints.

A request for internal housing complaint data from SouthCoast revealed that since 2015, there have been 19 housing discrimination complaints in the area, all concerning rental housing.

Disability	9
Source of income	5
Sexual Orientation	1
Race	3
Sex	1

Disability complaints also make up the majority of fair housing complaints statewide.

South Coastal Counties Legal Services, Inc.

SCCLS is a nonprofit organization providing free legal services to low income families, elders, victims of crime, and people with disabilities. The organization serves Barnstable, Bristol, Dukes, Nantucket, and Plymouth Counties and the Towns of Avon and Stoughton. The organization specializes in housing law, as well as family law, government benefits, elder law, education law, and consumer law. When advocates notice a widespread problem, they may engage in class action or impact litigation, as well as community education and legislative or administrative advocacy. Their offices are located in Fall River, Hyannis, and Brockton.

Pro-Home, Inc.

¹⁸⁶ <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleI/Chapter186/Section24>

Pro-Home is a nonprofit organized for educational and charitable purposes to produce and advocate for increased affordable housing, the elimination of housing discrimination, and to foster coalitions to address these issues. Pro-Home offers educational services including housing counseling service, first time homebuyer counseling, tenant/landlord counseling, and foreclosure counseling. Located in Taunton, Pro-Home services Attleboro, Taunton, Freetown, Mansfield, Middleboro, North Attleboro, Norton, Plainville, Raynham, Seekonk, and Carver.

Housing Solutions for Southeastern Massachusetts

Housing Solutions for Southeastern Massachusetts is a nonprofit organization with the goal of developing and helping people find affordable housing. It implements a variety of programs and resources, including housing for homeless families, homeless prevention initiatives, training and support for homebuyers and owners, administration of 2,200 rental subsidies, development and management of affordable housing, technical assistance to help cities and towns increase the supply of affordable housing, partnerships with service providers to address the housing needs of individuals with mental illness and developmental disabilities. Located in Kingston, MA, it services Plymouth and Bristol counties, as well as Randolph, Weymouth, Holbrook, and Cohasset.

Fair Housing Center of Greater Boston

The Fair Housing Center of Greater Boston implements training, community outreach, testing, case advocacy, public policy advocacy, housing counseling, and research in the name of fighting illegal housing discrimination. The office is located in Boston, and it serves the counties of Essex, Middlesex, Norfolk, Plymouth, and Suffolk.

Additional Information

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

Massachusetts Commission Against Discrimination

The Massachusetts Commission Against Discrimination (MCAD) investigates and prosecutes discrimination complaints in the fields of employment, housing, public places, access to education, lending, and credit. In order to bring this Analysis up to date with the prior AI, all MCAD Hearing Decisions between Jan. 1, 2015 and the present were reviewed to see whether any pertained to fair housing matters within the Consortium. There were no such decisions. Despite this lack of MCAD Hearing Decisions, between 2014 and 2018 the MCAD has handled a number of housing discrimination complaints that resolved at earlier stages of the process.

Attleboro	9
East Taunton	1
Lakeville	1
Mansfield	2
Middleborough	3
North Attleboro	7
Norton	2
Plainville	2
Taunton	12

According to the MCAD 2017 Annual Report, it had 416 housing complaints last year, making up 14% of the total complaints. A breakdown of housing complaints by category reveals that disability discrimination is the biggest problem, at 36%, followed by race/color at 16%. The data show that 43% of complaints are resolved at the pre-determination settlement level, with only 4% making it all the way to judicial review. Eighteen percent of substantive determinations had a finding of probable cause of discrimination.

Provide information relevant to programs, actions, or activities to promote Fair Housing outcomes and capacity.

The City of Taunton's Office of Economic and Community Development (OECD) holds fair housing outreach and awareness educational seminars, targeting individuals, lenders, property owners, and realtors.

The South Coast Counties Legal Services (SCCLS) provides fair housing and other legal services to low and moderate residents throughout the Consortium region. SCCLS also conducts fair housing workshops on tenants' rights to decent living conditions, including the state's sanitary code, the landlord's responsibilities to make improvements, guidance on what tenants can do if landlords do not undertake the required correction, and potential actions landlords may take in cases where a tenant is seeking remediation of unsafe living conditions.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement

There are several private fair housing organizations that service the area, including SouthCoast Fair Housing, South Coastal Counties Legal Services, Inc., Fair Housing of Greater Boston, as well as Housing Solutions of Southeastern Massachusetts (more focused on housing programs and support than legal services), and Pro-Home, Inc (a CHDO and housing education and advocacy organization). The need for local fair housing outreach is great, and these organizations require more funding in order to adequately pursue all of their outreach and enforcement goals.

- Lack of local public fair housing enforcement

The Massachusetts Commission Against Discrimination investigates and prosecutes housing discrimination complaints. There have been no MCAD Hearing Decisions on fair housing matters within the Taunton Consortium since Jan. 1, 2015. However, 43% of MCAD complaints are resolved at the pre-determination settlement level, so it is possible that there were relevant fair housing complaints for the Taunton Consortium that settled earlier on. Public records requests should be made to the MCAD to follow up on this.

The City of Taunton's Office of Economic and Community Development (OECD) also holds fair housing outreach and awareness educational seminars, targeting individuals, lenders, property owners, and realtors. On the more local level, Taunton's OECD data should be examined to determine whether a lack of local public fair housing enforcement is a significant contributing factor.

- Lack of resources for fair housing agencies and organizations

Fair housing groups' lack of resources is a contributing factor to a lack of fair housing enforcement in the Consortium. The Consortium is served by multiple private fair housing organizations, including SouthCoast Fair Housing, South Coastal Counties Legal Services, Inc., and the Fair Housing Center of Greater Boston. SouthCoast performs fair housing testing and evaluates housing discrimination complaints, to be referred to state agencies if they have merit. It receives funding from HUD's Fair Housing Initiatives Program, in addition to other donors. Fair Housing Center of Greater Boston conducts testing as well as other forms of outreach and training to combat housing discrimination. It receives support from the Boston Foundation, the Foley Hoag Foundation, the Hyams Foundation, MA Bar Foundation, and Massachusetts Foundation for the Humanities, in addition to corporate contributors, individual donors, and HUD's Fair Housing Initiatives Program. SCCLS provides free civil legal services in housing law cases. It does not receive funding from HUD's Fair Housing Initiative Program, but receives limited funding from the City of Taunton, and the City of Attleboro. It is hard to say whether these resources fall short of the actual need for private fair housing services, until comprehensive data on discrimination complaints in the area is gathered and analyzed.

- Lack of state or local fair housing laws

Lack of state or local fair housing laws is not a significant contributing factor to Fair Housing Enforcement. In addition to federal fair housing protections, Massachusetts state law protects against housing discrimination on the basis of race, color, religious creed, national origin, sex, age, ancestry, genetic information, veteran status, sexual orientation, marital status, children,

handicap, and receipt of public assistance or housing subsidy in the selling, renting, or leasing of housing accommodations, commercial space, or land intended for use as such.¹⁸⁷ Additionally, Massachusetts state law also supplements the federal Violence Against Women Act (VAWA) by giving fair housing protections to victims of domestic violence, rape, sexual assault, or stalking, allowing them to break their lease if necessary to protect their safety.¹⁸⁸

In Massachusetts, only manufactured housing/mobile homes may be regulated by local rent control. The Town of Lakeville has adopted a Manufactured Housing Communities Rent Control By-Law, which allows the town to declare a serious public emergency with regard to housing availability, and regulate for the use or occupancy of manufactured housing and establish a Rent Control Board to control rents, minimum standards of use, eviction of tenants, and requiring owner registration.¹⁸⁹ The Towns of Raynham and Middleboro have adopted similar Rent Control Boards.

- Unresolved violations of fair housing or civil rights law

Unresolved violations of fair housing or civil rights law is not a significant contributing factor to Fair Housing Enforcement. The cities and counties within the HOME Consortium do not have a substantial number of outstanding allegations or complaints. The state attorney general has called for an investigation of the Bristol County House of Corrections due to allegations about the treatment of inmates with mental illness, including routinely segregating them from the general population for long periods of time.¹⁹⁰ In 2002, the Middleborough Housing Authority was a defendant in a class action alleging that the policies regarding Section 8 preferences had a disparate racial impact.¹⁹¹ In 2008 the Town of Middleborough was sued by Lisa Higgins, alleging constructive discharge and retaliation for protected whistleblower activity.¹⁹² Middleborough and its Veterans Agent were also sued in 2007 for alleged violating the 14th and 1st amendment by harassing and limiting the speech of veteran Daniel Foye.¹⁹³ North Attleboro was sued in 2009 for alleged violations of the Americans with Disabilities Act, where the plaintiff alleged that the police force forcibly removed him from active duty due to his seizure condition, despite cause to do so.¹⁹⁴ A police officer in 2016 sued the Town of Plainville for seizing her personal cell phone in alleged violation of §1983.¹⁹⁵ The City of Taunton was sued in 2003 for alleged violations of the Fair Labor Standards Act, where plaintiff's claimed the city was underpaying blue collar workers by incorrectly calculating overtime wages owed.¹⁹⁶ The

¹⁸⁷ M.G.L. c. 151B.

¹⁸⁸ M.G.L. c. 186. S. 24.

¹⁸⁹ https://www.lakevillema.org/sites/lakevillema/files/uploads/2016_general_bylaws.pdf

¹⁹⁰ <http://www.tauntongazette.com/news/20180620/ag-healey-calls-for-investigation-of-bristol-county-house-of-correction>

¹⁹¹ *Langlois v. Abington Housing Authority*, 234 F. Supp.2d 33 (2002).

¹⁹² *Higgins v. Town of Middleborough*, 2008 WL 7255407.

¹⁹³ *Foye v. Town of Middleborough*, 2007 WL 4581418.

¹⁹⁴ *Nicholas v. Town of North Attleboro*, 2009 WL 5701846.

¹⁹⁵ *Barrett v. Town of Plainville*, 2016 WL 7414716.

¹⁹⁶ *Sylvia v. City of Taunton*, 2003 WL 23886004.

city was also subject to a wrongful death suit that included due process and other civil rights claims after a police chase caused the suspect vehicle to crash and kill the plaintiffs' decedent.¹⁹⁷

Other – N/A

VI. FAIR HOUSING GOALS AND PRIORITIES

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

Segregation

This Analysis assessed the following potential contributing factors in connection with the fair housing issue of segregation. They are categorized as high, medium, or low priority with a brief justification for the prioritization included.

- Community opposition – High Priority
 - Community opposition is a high priority contributing factor to the fair housing issue of segregation. There have been multiple recent examples of community opposition slowing down proposed affordable housing developments that would contribute to greater residential integration within the region.
- Land use and zoning laws – High Priority
 - Land use and zoning laws are a high priority contributing factor to segregation. Multiple municipalities within the Consortium predominantly consist of land zoned for large lot single-family homes. This practice limits opportunities for affordable housing development that could foster integration.
- Lending discrimination – High Priority
 - Lending discrimination is a high priority contributing factor to the fair housing issue of segregation. Because a large majority of the housing stock in high-opportunity areas within the Consortium consists of owner-occupied single-family homes, the denial of access to mortgage credit can effectively mean the denial of access to these neighborhoods. Home Mortgage Disclosure Act data shows that disparities in loan origination rates by race persist. Although the Consortium and its members do not have direct regulatory control over mortgage lenders, they can help to combat lending discrimination by funding fair housing testing of banks and by using their own leverage as customers of financial institutions to affect policy.
- Location and type of affordable housing – High Priority
 - The location and type of affordable housing is a high priority contributing factor to the fair housing issue of segregation. Although both the Commonwealth of Massachusetts and the State of Rhode Island have adopted policies to promote the

¹⁹⁷ Brockway v. City of Taunton, 2003 WL 23886708.

development of affordable housing in high-opportunity areas, much of the stock of affordable housing in the region came into existence before that progress occurred. Thus, disproportionately Black and Hispanic cities like Providence, Pawtucket, New Bedford, and Brockton continue to be home to a large share of the region's affordable housing. This is true on a micro level with respect to the City of Taunton within the Consortium.

- Loss of affordable housing – High Priority
 - The loss of affordable housing is a high priority contributing factor to the fair housing issue of segregation. There are multiple affordable housing developments that are already located within predominantly non-Hispanic White areas in the Consortium that have subsidies expiring in the near-term future. Preventing the loss of these units should be a high priority because it is more economical and easier to have a short-term impact when preserving affordable housing than when constructing new affordable housing, a process that often takes years to complete.
- Private discrimination – High Priority
 - Private discrimination is a high priority contributing factor to the fair housing issue of segregation. Although there is not abundant data available regarding the prevalence of private discrimination, there have been significant enforcement actions challenging discrimination on the basis of race and familial status. National data suggests that private discrimination remains prevalent.
- Lack of private investments in specific neighborhoods – Medium Priority
 - Lack of private investments in specific neighborhoods is a medium priority contributing factor to the fair housing issue of segregation. There are areas within Taunton and Attleboro that have relatively high Black and Hispanic populations in relation to the Consortium as a whole and that also have a concentration of households without vehicles residing more than ½ mile from the nearest grocery store. Lack of access to healthy foods in these neighborhoods poses a risk of causing the re-segregation of these relatively integrated neighborhoods. In comparison to other contributing factors, inequitable access to grocery stores does not appear to be as significant of a causal driver of regional demographic variations.
- Lack of regional cooperation – Medium Priority
 - Lack of regional cooperation is a medium priority contributing factor to the fair housing issue of segregation. Although there is an effective infrastructure for regional cooperation in the Consortium and the region, the non-participation of some high-opportunity towns in the Consortium reduces the effectiveness of the Consortium's efforts to foster integration.
- Displacement of residents due to economic pressures – Low Priority
 - Displacement of residents due to economic pressures is a low priority contributing factor to the fair housing issue of segregation. This Analysis did not reveal examples of gentrification and displacement occurring within the Consortium. Although there are some early signs of displacement in Providence, Rhode Island, the situation there does not have as pervasive effects as it is in Greater Boston.

Because the Consortium has relatively limited influence over the policies that would directly address displacement in Providence, it would not be strategic to assign this contributing factor a higher priority level.

- Lack of community revitalization strategies – Low Priority
 - Lack of community revitalization is a low priority contributing factor to the fair housing issue of segregation. Areas within the Consortium that have community revitalization needs tend to still have mostly non-Hispanic White populations. Areas outside of the Consortium that have R/ECAPs and other areas of Black and Hispanic population concentration generally appear to be implementing robust community revitalization strategies.
- Lack of public investments in specific neighborhoods, including services or amenities – Low Priority
 - Lack of public investments in specific neighborhoods, including services or amenities, is a low priority contributing factor to segregation. Although the City of Taunton, as the most racially and ethnically diverse community in the Consortium, is reported to have problems with substandard roads, this Analysis did not reveal evidence that the roads have caused segregation.
- Occupancy codes and restrictions – Low Priority
 - Occupancy codes and restrictions are a low priority contributing factor to the fair housing issue of segregation. Although some municipalities within the Consortium have restrictive definitions of the term “family” within their zoning ordinances and those definitions have the potential to limit housing opportunity for persons with disabilities, other types of occupancy restrictions are not prevalent. The impact of restrictive definitions of the term “family” is addressed in conjunction with the contributing factor regarding regulatory barriers to providing housing and supportive services for persons with disabilities.
- Source of income discrimination – Low Priority
 - Source of income discrimination is a low priority contributing factor to the fair housing issue of segregation. Although source of income discrimination still occurs despite being outlawed under Massachusetts law, the law appears to have been relatively effective in rooting out discrimination. For example, few discriminatory advertisements appear in housing searches in the area. Lack of adequate payment standards for Housing Choice Vouchers is a far more significant cause of the distribution of voucher holders. Source of income discrimination contributes more significantly to segregation in the portion of the region that is within Rhode Island, but the Consortium’s ability to affect that problem within Rhode Island is limited.

R/ECAPs

- Community opposition – High Priority
 - Community opposition is a high priority contributing factor to R/ECAPs. The justification for this prioritization flows naturally from the connection between community opposition and segregation: when disproportionately low-income

Black and Hispanic households have few options in predominantly non-Hispanic White areas because of community opposition, they have little choice but to reside in R/ECAPs and other similar areas, thus reinforcing existing patterns.

- Land use and zoning laws – High Priority
 - Land use and zoning laws are a high priority contributing factor to R/ECAPs because large lot single-family zoning limits the options that residents of R/ECAPs have to relocate.
- Location and type of affordable housing – High Priority
 - The location and type of affordable housing is a high priority contributing factor to R/ECAPs for similar reasons to those for its priority level with respect to segregation. The lack of opportunity for low-income Black and Hispanic households to reside outside of R/ECAPs perpetuates those conditions of concentration.
- Loss of affordable housing – High Priority
 - Similarly, the loss of affordable housing in high-opportunity areas, including within the Consortium, is a high priority contributing factor to R/ECAPs because it limits residents' options to move out of R/ECAPs.
- Private discrimination – High Priority
 - Private discrimination is a high priority contributing factor to R/ECAPs because it reinforces the racial and ethnic demographics of R/ECAP neighborhoods by limiting the ability of people of color to move regardless of their economic status. Discrimination on the basis of race also disproportionately burdens Housing Choice Voucher holders who are seeking to move to high-opportunity areas.
- Lack of local or regional cooperation – Medium Priority
 - Lack of local or regional cooperation is a medium priority contributing factor to R/ECAPs. The non-participation of some municipalities adjacent to the Consortium undermines efforts to reduce the prevalence of R/ECAPs through the equitable distribution of affordable housing across communities.
- Deteriorated and abandoned properties – Low Priority
 - Deteriorated and abandoned properties are a low priority contributing factor to the fair housing issue of R/ECAPs. Although deteriorated and abandoned properties contribute to R/ECAPs in cities within the region outside of the Consortium, programs are in place to combat the proliferation of such properties, and the Consortium has limited influence with respect to the regulation of and rehabilitation of deteriorated and abandoned properties in other jurisdictions.
- Displacement of residents due to economic pressures – Low Priority
 - The displacement of residents due to economic pressures is a low priority contributing factor to the fair housing issue of R/ECAPs. The rationale for that level of prioritization is effectively the same as that for its prioritization with respect to segregation.
- Lack of community revitalization strategies – Low Priority
 - Lack of community revitalization strategies is a low priority contributing factor to R/ECAPs. Although it may be beneficial to increase the scale of community

revitalization efforts, there do appear to be strategies in place in cities with R/ECAPs throughout the region. Additionally, this is a contributing factor that the Consortium has a limited ability to influence.

- Lack of private investments in specific neighborhoods – Low Priority
 - Lack of private investments in specific neighborhoods is a low priority contributing factor to R/ECAPs. Although lack of private investments undoubtedly contributes to the impoverishment of R/ECAPs in nearby cities, the Consortium’s ability to influence private investment outside of its jurisdiction is limited.
- Lack of public investments in specific neighborhoods, including services or amenities – Low Priority
 - Lack of public investments in specific neighborhoods, including services or amenities, is a low priority contributing factor to R/ECAPs. This Analysis did not reveal evidence of inadequate public investment in R/ECAPs in the region.
- Occupancy codes and restrictions – Low Priority
 - Restrictive definitions of the term “family,” as the only identified occupancy codes and restrictions, are a low priority with respect to R/ECAPs as they likely have no causal connection to R/ECAPs.
- Source of income discrimination – Low Priority
 - Source of income discrimination is a low priority contributing factor with respect to R/ECAPs because of the Consortium’s limited capacity to address source of income discrimination across state lines in Rhode Island.

Disparities in Access to Opportunity

- Availability, type, frequency, and reliability of public transportation – High Priority
 - The availability, type, frequency, and reliability of public transportation is a high priority contributing factor to disparities in access to opportunity. Gaps in local transit deter Black and Hispanic households from moving to high-opportunity portions of the Consortium, and gaps in regional service, particularly the lack of commuter rail service in Taunton, cut people in the most racially and ethnically diverse parts of the Consortium off from economic opportunity in job centers outside of the Consortium.
- Impediments to mobility – High Priority
 - Impediments to mobility, specifically inadequate fair market rents for the Housing Choice Voucher program in high-opportunity areas, are a high priority contributing factor to disparities in access to opportunity. Disproportionately Black and Hispanic voucher holders are currently unable to access the most proficient schools for their children.
- Land use and zoning laws – High Priority
 - Land use and zoning laws are a high priority contributing factor to disparities in access to opportunity. Multiple communities with highly restrictive zoning are also areas of high opportunity.

- Lending discrimination – High Priority
 - Lending discrimination is a high priority contributing factor to disparities in access to opportunity for much the same reason that it is a high priority with respect to segregation: the housing stock in high-opportunity areas mostly consists of owner-occupied single-family homes.
- Location and type of affordable housing – High Priority
 - The location and type of affordable housing are a high priority contributing factor to disparities in access to opportunity. A disproportionate share of older affordable housing in the region is located in areas that are isolated from multiple dimensions of opportunity.
- Loss of affordable housing – High Priority
 - The loss of affordable housing is a high priority contributing factor to disparities in access to opportunity for much the same reason that it is a high priority with respect to other fair housing issues. The loss of affordable housing in high-opportunity areas would reduce the already limited amount of access to opportunity that protected class members currently experience.
- Private discrimination – High Priority
 - Private discrimination is a high priority contributing factor to disparities in access to opportunity for the same reasons that it is a high priority with respect to other fair housing issues.
- Lack of access to opportunity due to high housing costs – Medium Priority
 - Lack of access to opportunity due to high housing costs is a medium priority contributing factor to disparities in access to opportunity. High housing costs make it difficult for Black and Hispanic households in the region to move to high-opportunity areas, but this contributing factor is, to some extent, a symptom of other, more pressing contributing factors rather than a causal force on its own.
- Lack of local or regional cooperation – Medium Priority
 - Lack of local or regional cooperation is a medium priority contributing factor to disparities in access to opportunity. The non-participation in the Consortium of nearby high-opportunity towns makes it more difficult for protected class members in the region to access the opportunities that those communities afford their residents.
- Location of environmental health hazards – Medium Priority
 - The location of environmental health hazards is a medium priority contributing factor to disparities in access to opportunity. Taunton, as the most racially and ethnically diverse community in the Consortium, accounts for the vast majority of the Consortium's brownfield sites.
- Location of proficient schools and school assignment policies – Medium Priority
 - The location of proficient schools and school assignment policies are a medium priority contributing factor to disparities in access to opportunity. Some high-opportunity school districts within the Consortium do not currently allow for Inter-District School Choice transfers into their schools. Because school districts

are separate entities from local governments, the Consortium has only a moderate degree of influence over the barrier posed by these policies.

- Access to financial services – Low Priority
 - Access to financial services is a low-priority contributing factor to disparities in access to opportunity because there do not appear to be significant spatial inequities in the distribution of mainstream financial institutions within the Consortium. Although there are banking deserts in the City of Providence, the Consortium has limited leverage to address that problem.
- Lack of private investments in specific neighborhoods – Low Priority
 - Lack of private investments in specific neighborhoods is a low priority contributing factor to disparities in access to opportunity. The main form of disinvestment identified in this Analysis, food deserts, is an important one but is not as intimately connected to the main dimensions of opportunity addressed in this Analysis as are some of the other contributing factors.
- Lack of public investments in specific neighborhoods, including services or amenities – Low Priority
 - Lack of public investments in specific neighborhoods, including services or amenities, is a low priority contributing factor to disparities in access to opportunity because road maintenance is only loosely linked to the key dimensions of opportunity.
- Location of employers – Low Priority
 - The location of employers is a low priority contributing factor to disparities in access to opportunity. Areas with concentrations of protected class members tend to be located nearer to job centers than are otherwise high-opportunity areas.
- Occupancy codes and restrictions – Low Priority
 - Occupancy codes and restrictions are a low priority contributing factor to disparities in access to opportunity as the only identified occupancy restriction,
- Source of income discrimination – Low Priority
 - Source of income discrimination is a low priority contributing factor to disparities in access to opportunity because of the effectiveness of laws combatting the practice in Massachusetts and the limited ability of the Consortium to combat the practice in Rhode Island.

Disproportionate Housing Needs

- Land use and zoning laws – High Priority
 - Land use and zoning laws are a high priority contributing factor to disproportionate housing needs because they inflate housing costs with the result of increased cost burden.
- Loss of affordable housing – High Priority
 - Loss of affordable housing is a high priority contributing factor to disproportionate housing needs. Disproportionately Black and Hispanic households displaced from affordable housing developments with expired subsidies like LIHTC that do not afford protections for tenants in the effect of

expiration are likely to pay an unsustainable percentage of their income on rent in the private market.

- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking – Medium Priority
 - Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking is a medium priority contributing factor to disproportionate housing needs. Community participants provided compelling input regarding the effect of displacement of domestic violence survivors. Massachusetts law provides strong protections, but, though some housing authorities like that in Attleboro, provide tenant selection preferences, that practice is not universal in the area.
- Lack of access to opportunity due to high housing costs – Medium Priority
 - Lack of access to opportunity due to high housing costs is a medium priority contributing factor to disproportionate housing needs. The relationship between high housing costs and high cost burden is self-evident, but direct causes of high housing costs are a higher priority to address.
- Lending discrimination – Medium Priority
 - Lending discrimination is a medium priority contributing factor to disproportionate housing needs. Although subprime lending practices are less common they were prior to the 2008 financial crisis, there continue to be disparities in loan pricing on the basis of race. These disparities directly increase the percentage of monthly income that Black and Hispanic households are spending on mortgage payments.
- Availability of affordable units in a range of sizes – Low Priority
 - The availability of affordable units in a range of sizes is a low priority contributing factor to disproportionate housing needs. This Analysis revealed very low levels of overcrowding in the Consortium and region. Although it would be helpful to rebalance the affordable housing stock away from 0-1-bedroom units in developments for seniors to a broader range of unit sizes in family-occupancy developments that also include seniors, other contributing factors appear to have a more significant impact on disproportionate housing needs.
- Displacement of residents due to economic pressures – Low Priority
 - Displacement of residents due to economic pressures is a low priority contributing factor to disproportionate housing needs due to the limited evidence of displacement within the Consortium and region.
- Lack of private investments in specific neighborhoods – Low Priority
 - Lack of private investments in specific neighborhoods is a low priority contributing factor to disproportionate housing needs. There does not appear to be a strong causal relationship between, for example, the location of grocery stores and the percentage of household income that Black and Hispanic households are spending on rent.
- Lack of public investments in specific neighborhoods, including services or amenities – Low Priority

- Lack of public investments in specific neighborhoods, including services or amenities, is a low priority contributing factor to disproportionate housing needs because this Analysis did not reveal any relationship between road maintenance and outcomes like cost burden and overcrowding.
- Source of income discrimination – Low Priority
 - Source of income discrimination is a low priority contributing factor to disproportionate housing needs. There does not appear to be a substantial relationship between source of income discrimination and housing cost burden and overcrowding.

Publicly Supported Housing Location and Occupancy

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing – High Priority
 - Admissions and occupancy policies and procedures, including preferences in publicly supported housing are a high priority contributing factor to the occupancy of publicly supported housing. Both residency preferences and restrictive criminal background screening practices limit access to publicly supported housing in parts of the Consortium for disproportionately Black and Hispanic populations.
- Community opposition – High Priority
 - Community opposition is a high priority contributing factor to the location of publicly supported housing for much the same reasons that community opposition contributes to segregation more broadly.
- Impediments to mobility – High Priority
 - Impediments to mobility are a high priority contributing factor to the location of publicly supported housing residents who use Housing Choice Vouchers. Metropolitan FMRs are not sufficient to enable voucher holders to access a broad range of neighborhoods.
- Land use and zoning laws – High Priority
 - Land use and zoning laws are a high priority contributing factor to the location of publicly supported housing because affordable housing developers are deterred from building in high-opportunity areas by the presence of zoning barriers.
- Loss of affordable housing – High Priority
 - The loss of affordable housing is a high priority contributing factor to the location of publicly supported housing. The relationship between this contributing factor and the underlying fair housing issue is self-evident. Additionally, owners of publicly supported housing developments with expiring subsidies that are located in high-demand areas generally have less incentive to extend their subsidies than do those in low-opportunity areas.
- Quality of affordable housing information programs – High Priority
 - The quality of affordable housing information programs is a high priority contributing factor to the location of publicly supported housing residents. Public housing authorities in the Consortium and region do not offer robust mobility

counseling to Housing Choice Voucher holders who may desire opportunities outside of Attleboro, Taunton, Middleborough, and the diverse cities outside of the Consortium.

- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking – Medium Priority
 - Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking is a medium priority contributing factor to publicly supported housing occupancy. As discussed above, the more widespread adoption of Housing Choice Voucher tenant selection preferences for domestic violence survivors would be helpful.
- Lack of access to opportunity due to high housing costs – Medium Priority
 - Lack of access to opportunity due to high housing costs is a medium priority contributing factor to the location of publicly supported housing residents with vouchers. High housing costs are the other side of the coin of inadequate FMRs. When combined, both prevent voucher holders from accessing a broad range of neighborhoods.
- Lack of local or regional cooperation – Medium Priority
 - Lack of local or regional cooperation is a medium priority contributing factor to publicly supported housing location. As discussed above, the non-participation of certain nearby towns in the Consortium makes the development of publicly supported housing in those communities much more difficult.
- Displacement of residents due to economic pressures – Low Priority
 - Displacement of residents due to economic pressures is a low priority contributing factor to fair housing issues related to publicly supported housing in light of the relatively limited prevalence of displacement and the limited ability of the Consortium to directly address displacement in Providence.
- Lack of meaningful language access – Low Priority
 - Lack of meaningful language access is a low priority contributing factor to publicly supported housing occupancy. Because of the low number of LEP residents within the Consortium, the requirements applicable to Consortium members are relatively limited.
- Lack of private investments in specific neighborhoods – Low Priority
 - Lack of private investments in specific neighborhoods is a low priority contributing factor to fair housing issues connected to publicly supported housing. There does not appear to be any direct causal connection between lack of private investment, including in grocery stores, and the location and occupancy of publicly supported housing.
- Lack of public investments in specific neighborhoods, including services or amenities – Low Priority
 - Lack of public investments in specific neighborhoods, including services or amenities, is a low priority contributing factor to the location of publicly supported housing. Although adverse neighborhood conditions, like roads in a

state of disrepair, may make neighborhoods more accessible to Housing Choice Voucher holders by depressing rents, this is not a very direct connection.

- Occupancy codes and restrictions – Low Priority
 - Occupancy codes and restrictions are a low priority contributing factor to publicly supported housing occupancy. There does not appear to be a causal connection between restrictive definitions of the term “family” and the occupancy of publicly supported housing.
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs – Low Priority
 - Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs are a low priority contributing factor to the location of publicly supported housing. Although past siting decisions have created an inequitable pattern of distribution for publicly supported housing, current policies are working more aggressively than elsewhere in the country to remedy this problem.
- Source of income discrimination – Low Priority
 - Source of income discrimination is a low priority contributing factor to the location of publicly supported housing residents due to the effectiveness of laws banning the practice and the limited ability of the Consortium to counteract source of income discrimination in Rhode Island.

Disability and Access

- Access to publicly supported housing for persons with disabilities – High Priority
 - Access to publicly supported housing for persons with disabilities is a high priority contributing factor to the segregation of persons with disabilities. This is due to the overall shortage of publicly supported housing, the tendency of local entities to provide senior housing that does not serve younger people with disabilities, and the lack of uniformity in admissions and tenant selection preferences for persons with disabilities.
- Lack of affordable, accessible housing in a range of unit sizes – High Priority
 - The lack of affordable, accessible housing in a range of unit sizes is a high priority contributing factor to the segregation of persons with disabilities. There is simultaneously an overall shortage of affordable units, a lack of larger units among the affordable stock, and a high number of older units that may not be accessible among the affordable stock.
- Lack of affordable, integrated housing for individuals who need supportive services – High Priority
 - Lack of affordable, integrated housing for individuals who need supportive services is a high priority contributing factor to the segregation of persons with disabilities. Although Massachusetts has made great strides in the provision of permanent supportive housing, the need continues to outstrip the supply.

- Lack of assistance for transitioning from institutional settings to integrated housing – High Priority
 - Lack of assistance for transitioning from institutional settings to integrated housing is a high priority contributing factor to the segregation of persons with disabilities. There does not appear to be funding available for security deposit assistance for individuals leaving nursing homes to move into permanent supportive housing.
- Land use and zoning laws – High Priority
 - Land use and zoning laws are a high priority contributing factor to the segregation of persons with disabilities. Less restrictive zoning would make existing affordable housing resources go further thus enabling the development of more permanent supportive housing.
- Access to transportation for persons with disabilities – Medium Priority
 - Access to transportation for persons with disabilities is a medium priority contributing factor to disparities in access to opportunity for persons with disabilities. Although this Analysis did not reveal specific non-compliance with accessibility requirements by transit agencies, the overall gaps in transit service may disproportionately burden persons with disabilities since persons with disabilities have lower earnings than individuals without disabilities.
- Inaccessible government facilities or services – Medium Priority
 - Inaccessible government facilities or services is a medium priority contributing factor to disparities in access to opportunity for persons with disabilities. This Analysis revealed a widespread lack of well-advertised, public information about the accessibility of government facilities and services throughout the Consortium.
- Inaccessible public or private infrastructure – Medium Priority
 - Inaccessible public or private infrastructure is a medium priority contributing factor to disparities in access to opportunity for persons with disabilities. The City of Taunton has been subject to litigation in recent decades over the accessibility of its infrastructure. More broadly, there is a lack of public information about the accessibility of public infrastructure, suggesting a need for better record keeping. This contributing factor is of medium rather than high priority because of the more significant role of lack of access to housing in determining access to opportunity.
- Lack of access to opportunity due to high housing costs – Medium Priority
 - Lack of access to opportunity due to high housing costs is a medium priority contributing factor to the segregation of persons with disabilities. As persons with disabilities and particularly those in institutions have disproportionately low incomes, their need for affordable housing is correspondingly high. Contributing factors that address the causes of high housing costs are treated as higher priority.
- Lack of assistance for housing accessibility modifications – Medium Priority
 - Lack of assistance for housing accessibility modifications is a medium priority contributing factor to the segregation of persons with disabilities. There are no programs in the Consortium that specifically target home rehabilitation funds to

accessibility modifications. At the same time, low-income homeowners with disabilities can use broader home rehabilitation programs for that purpose.

- Lack of local or regional cooperation – Medium Priority
 - Lack of local or regional cooperation is a medium priority contributing factor to the segregation of persons with disabilities for the same reasons that it is for other fair housing issues: non-participation in the Consortium by nearby municipalities undermines all affordable housing efforts including those focusing on permanent supportive housing.
- Location of accessible housing – Medium Priority
 - The location of accessible housing is a medium priority contributing factor to disparities in access to opportunity. Because most accessible housing is located in areas with more multifamily housing and more publicly supported housing, it is, as a consequence, disproportionately not located within the highest opportunity portions of the Consortium.
- Access for persons with disabilities to proficient schools – Low Priority
 - Access for persons with disabilities to proficient schools is a low priority contributing factor to disparities in access to education for persons with disabilities. This Analysis did not unearth any red flags with respect to access to proficient schools for persons with disabilities.
- Lack of affordable in-home or community-based supportive services – Low Priority
 - Lack of affordable in-home or community-based supportive services is a low priority contributing factor to the segregation of persons with disabilities. Unlike many states, Massachusetts does not have a long waiting list for community-based services funded through Medicaid.
- Lending discrimination – Low Priority
 - Lending discrimination is a low priority contributing factor to fair housing issues for persons with disabilities. This Analysis did not reveal evidence of lending discrimination in the Consortium and the region against persons with disabilities.
- Loss of affordable housing – Low Priority
 - The loss of affordable housing is a low priority contributing factor to the segregation of persons with disabilities. Although the loss of affordable housing is a significant issue generally, units in developments with expiring subsidies are likely to be older ones that are less likely to be accessible.
- Occupancy codes and restrictions – Low Priority
 - Occupancy codes and restrictions are a low priority contributing factor to segregation for persons with disabilities. Although some municipalities within the Consortium have restrictive definitions of the term “family,” this Analysis did not reveal a pattern of group homes being denied permission to operate on this basis. Additionally, permanent supportive housing rather than group homes has emerged as the most integrated model for providing housing for persons with disabilities who need supportive services.
- Regulatory barriers to providing housing and supportive services for persons with disabilities – Low Priority

- Regulatory barriers to providing housing and supportive services for persons with disabilities are a low priority contributing factor to the segregation of persons with disabilities. Although some municipalities in the Consortium have restrictions on rooming and boarding houses that could be misapplied to limit group homes for persons with disabilities, this Analysis did not reveal examples of that happening in practice.
- Source of income discrimination – Low Priority
 - Source of income discrimination is a low priority contributing factor to the segregation of persons with disabilities because of effective laws prohibiting the practice.
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings – Low Priority
 - 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 low priority contributing factor to the segregation of persons with disabilities. This Analysis did not reveal any such laws, policies, or practices.

Fair Housing Enforcement, Outreach Capacity, and Resources

- Lack of resources for fair housing agencies and organizations – High Priority
 - Lack of resources for fair housing agencies and organizations is a high priority contributing factor to segregation. Lack of resources is the main barrier to existing organizations being able to meet the total need.
- Lack of local private fair housing outreach and enforcement – Medium Priority
 - Lack of local private fair housing outreach and enforcement is a medium priority contributing factor to segregation. There is private fair housing infrastructure in place, but the need for its services always exceeds its capacity. Additionally, local providers do not have the resources to be able to maintain a physical presence in the Consortium through a local office.
- Lack of local public fair housing enforcement – Medium Priority
 - Lack of local public fair housing enforcement is a medium priority contributing factor to segregation. Although the Massachusetts Commission Against Discrimination engages in public fair housing enforcement, there are no local government enforcement entities in the Consortium.
- Lack of state or local fair housing laws – Low Priority
 - Lack of state or local fair housing laws is a low priority contributing factor to fair housing issues. Massachusetts has among the strongest state law protections in the country. The adoption of source of income protections in nearby Rhode Island would be beneficial.
- Unresolved violations of fair housing or civil rights law – Low Priority

- Unresolved violations of fair housing or civil rights law are a low priority contributing factor to fair housing issues. Recent civil rights challenges to Consortium members lack a significant connection to housing issues.
2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributed factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Promote reforms to current zoning regulations including the development of mandatory inclusionary zoning policies and increased residential density to support the production of affordable housing in high opportunity neighborhoods.	Land use and zoning laws; Lack of access to opportunity due to high housing costs; Location and type of affordable housing	Segregation; R/ECAPs; Disparities in Access to Opportunity; Disproportionate Housing Needs; Publicly Supported Housing Location; Segregation of Persons with Disabilities	Promote an increase in the percentage of land zoned for multifamily housing; Promote adoption of inclusionary zoning ordinances by Consortium members; 1-3 years	All program participants' planning staff and City Councils and Town Boards, respectively
Discussion: Zoning and land use laws emerged as one of the highest priority contributing factors to several fair housing issues. Increasing allowable density in high-opportunity areas increases the potential for affordable housing development in a broad range of communities. Incorporating inclusionary requirements at the same time as up-zoning ensures that real affordability, rather than just luxury condominiums, actual results from the change.				
Create awareness of the availability of HUD sponsored Fair Housing webinars and other informational material for all housing authorities	Admissions and Occupancy Policies, Including Preferences in Publicly	Segregation; Disproportionate Housing Needs	Ongoing contract with all Consortium members and housing authorities, providing links to training videos	City of Taunton as lead entity to

in the Consortium to ensure that they are following HUD's Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions that was issued on April 4, 2016.	Supported Housing		and other relevant Fair Housing information; 1 year	
Discussion: The application of the Fair Housing Act to criminal background screening practices is an emerging area, and the law is quickly evolving. Because this Analysis revealed some potentially problematic practices among local public housing authorities, training would help the process of conforming local practices to HUD guidance.				
Work with local agencies and relevant municipal departments to consider strengthening code enforcement and increasing penalties for repeat violators in order to reduce displacement of low- and moderate-income residents.	Deteriorated and abandoned properties; Location of Environmental Health Hazards	Disparities in Access to Opportunity; Disproportionate Housing Needs	Encourage the passage of ordinances to strengthen penalties; Increase the number of enforcement actions; Encourage other Consortium members to enact similar measures: 1-3 years	City of Taunton OECD as lead entity for the Consortium
Discussion: The City of Taunton, in particular, is a community with old housing stock. That poses health and safety challenges for tenants, in general, and tenants who are members of protected classes, in particular. Through aggressive but nuanced code enforcement, the City of Taunton can help mitigate disparate exposure to unsafe housing conditions.				
Advocate for additional bus routes in underserved areas that are increasing the amount of land zoned for multifamily housing	Availability, type, frequency, and reliability of public transportation; Access to	Segregation; Disparities in Access to Opportunity; Disparities in Access to Opportunity for	Encourage the study of service extensions and the creation of new routes when	Greater Attleboro Taunton Regional Transit Authority

to increase both ridership and rental housing opportunities.	transportation for persons with disabilities	Persons with Disabilities	identified; 1-3 years	
Discussion: Communities within the Consortium that lack affordable housing and opportunities for Housing Choice Voucher holders also tend to be those that lack adequate bus service. In order to ensure that attempts to expand affordable housing access in those communities, OECD will advocate for expanding bus service where need is identified.				
Promote adoption of Small Area Fair Market Rents for the Housing Choice Voucher program where not currently in use.	Impediments to mobility	Segregation; R/ECAPs; Disparities in Access to Opportunity; Publicly Supported Housing Location	Encourage the adoption of Small Area Fair Market Rents; 1 year	Public housing authorities' staff
Discussion: Metropolitan fair market rents are inadequate to allow voucher holders to live in many high opportunity areas within the Consortium. HUD allows public housing authorities to voluntarily adopt Small Area Fair Market Rents in order to foster integration and increase access to opportunity.				
Work to increase the supply of permanent supportive housing for people with disabilities, in general, and people with disabilities who are at risk of unnecessary institutionalization, in particular.	Access to publicly supported housing for persons with disabilities; Availability of affordable, accessible units in a range of unit sizes; Lack of affordable, integrated housing for individuals who need supportive services; Location of	Segregation of Persons with Disabilities	Work to increase the production of additional units of permanent supportive housing; 3-5 years	Consortium members' housing and community development staff in collaboration with non-profits, and affordable housing developers

	accessible housing			
<p>Discussion: Massachusetts has made great strides in increasing the supply of permanent supportive housing for persons with disabilities, but there is still more that local partners like the Consortium can do to take those efforts to scale. Lack of access to housing is the largest remaining impediment to full community integration for persons with disabilities in the Consortium.</p>				
Encourage public housing authorities to create waiting list preferences for both the Housing Choice Voucher program and for public housing for persons with disabilities who are exiting institutions or are at risk of institutionalization.	Access to publicly supported housing for persons with disabilities; Lack of affordable, integrated housing for individuals who need supportive services	Segregation of Persons with Disabilities	Encourage Consortium public housing authorities to create waiting lists for persons with disabilities who are exiting institutions or are at risk of institutionalization if they are not currently doing so; 1 year	Public housing authorities' staff
<p>Discussion: Because of the nature of institutionalization, people with disabilities who have been living in nursing homes and other long-term care facilities may not have been able to sign up for publicly supportive housing waiting lists in the past. With long waiting lists, many people just being served now signed up years ago. Consequently, admissions and tenant selection preferences may be necessary to provide equal opportunity for people exiting institutions.</p>				
Encourage housing developers to create affirmative marketing plans aimed at soliciting tenants outside the Consortium with the aim of expanding housing choices of persons who are members of protected classes.	Admissions and occupancy policies, including preferences in publicly supported housing; Private discrimination; Quality of affordable housing information programs	Segregation; Disparities in Access to Opportunity; Publicly Supported Housing Occupancy	Review affirmative fair marketing plans as projects arise and encourage outreach efforts when applicable; 1 year	Consortium staff

Discussion: Black and Hispanic residents of Brockton, New Bedford, Providence, and Pawtucket may not be immediately be aware of new publicly supported housing opportunities in the Consortium. Engaging targeted affirmative marketing of available units that reaches these communities can advance integration.

Encourage fair housing awareness and training for landlords on Massachusetts' Source of Income Discrimination protections to reduce the number of voucher holders turned away.	Private discrimination; Source of income discrimination	Segregation; R/ECAPs; Disparities in Access to Opportunity; Disproportionate Housing Needs; Publicly Supported Housing Location; Fair Housing Enforcement, Outreach Capacity, and Resources	OECD will provide links to HUD webinars and other fair housing informational sites to create an awareness of fair housing issues; 1 year	City of Taunton as lead entity
--	---	---	--	--------------------------------

Discussion: Although Massachusetts law provides strong legal tools to combat source of income discrimination, some landlords violate these laws, as they do housing discrimination laws more generally. Targeted education efforts would help to reduce the incidence of unlawful source of income discrimination.

Increase the awareness of Fair Housing issues for Consortium members and reinforce the commitment to implement the recommendations and goals created through the AI and Consolidated Plan process.	Lack of local or regional cooperation	Segregation; R/ECAPs; Disparities in Access to Opportunity; Disproportionate Housing Needs; Publicly Supported Housing Location and Occupancy; Disability and Access; Fair Housing Enforcement, Outreach Capacity, and Resources	Discuss Fair Housing issues when conducting HOME Consortium meetings and outreach efforts during program year; 1 year	Consortium staff and stakeholders
--	---------------------------------------	--	---	-----------------------------------

Discussion: The implementation of the goals in this AI, while achievable, will require a coordinated approach with robust support from partners outside of local government. A Task Force can help ease the implementation burden on local government staff and increase the likelihood of adoption of measures that require local legislative approval by creating a dedicated base of constituent supporters.

The AI lays out a series of achievable action steps that will help the Consortium to not only meet its obligation to affirmatively fair housing but also allow it to become a model for equity and inclusion in the region.