

Opportunity Mapping – Kirwan Institute

Opportunity mapping is a research tool used to understand the dynamics of “opportunity” within metropolitan areas. The purpose of opportunity mapping is to illustrate where opportunity rich communities exist (and assess who has access to these communities) and to understand what needs to be remedied in opportunity poor communities. Opportunity mapping builds upon the rich history of using neighborhood based information and mapping to understand the challenges impacting our neighborhoods.

Why map neighborhood conditions?

An extensive body of research has established that neighborhood conditions and proximity to opportunities such as high performing education or sustainable employment have a critical impact on quality of life and self-advancement. The central premise of opportunity mapping is that residents of a metropolitan area are situated within an interconnected web of opportunities that shape their quality of life. Opportunity mapping provides an analytical framework to measure opportunity comprehensively in metropolitan regions and determine who has access to opportunity rich areas. Opportunity mapping also provides a framework to assess what factors are limiting opportunity in a community and can assist in identifying what measures are needed to remedy these impediments to opportunity.

Calculating The Kirwan Composite Opportunity Index

The final Kirwan Composite opportunity index for each census tract is based on the average Z-score for all 18 indicators by category. The corresponding level of opportunity (very low, low, moderate, high, very high) is determined by sorting all census tracts into quintiles based on their opportunity index scores. Thus, the census tracts identified as “very high” opportunity represent the top 20% of scores among census tracts. Conversely, census tracts identified as “very low” opportunity represent the lowest-scoring 20% of census tracts.

Z-scores are helpful in the interpretation of raw score performance, since they take into account both the mean of the distribution and the amount of variability (or the standard deviation). The Z-score indicates how far the raw score is from the mean, either above or below it, in standard deviation units. A positive Z-score is always above the mean (upper 50%). A negative Z-score is always below the mean (lower 50%) and a Z-score of zero is always exactly on the mean or equal to 50% of the cases. Thus, when trying to understand the overall comparative performance of different groups with respect to a certain variable, we can assess how a certain group (of individuals, tracts, etc.) is performing with respect to the mean performance for the certain variable. No weighting was applied to the various indicators; all indicators were treated as equal in importance.

For more information on Kirwan Institute’s Opportunity Mapping Project see:

<http://kirwaninstitute.osu.edu/opportunity-communities/mapping/>

AFFH Data Documentation

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Overview

With HUD asking its program participants to take a more serious look at their fair housing context, the agency is taking a more active role as a dynamic partner by providing more data and analytical tools to help quantify and interpret particular fair housing dynamics. Along with new data, HUD will provide guidance tailored to accommodate jurisdictions of all capacity levels. This document outlines the data, methods, and sources behind the data that HUD will provide. HUD's Office of Policy Development & Research (PD&R) has compiled a set of neighborhood data and analyses that will be available to program participants to support local planning efforts. This document describes the data and analysis which accompany each of the core affirmatively furthering fair housing areas that program participants will address in the assessment of fair housing: segregation, racially/ethnically concentrated areas of poverty, disparities in access to community assets, and disproportionate housing needs. This data package is by no means exhaustive, and should not supplant more robust local data or knowledge. It represents a baseline effort to assemble consistent, largely nationally available data from a variety of sources in a single location and provide examples of possible analytical strategies to examine racially-concentrated areas of poverty, segregation and integration, access to community assets, and disproportionate housing needs.

1 Geographic Notes

Core data on race, ethnicity, and poverty is provided at two geographic levels: block-groups from the Census 2010, and census tracts from the American Community Survey 2006-2010 estimates. Where census 2010 data is available it is used in place of survey data to allay concerns about sampling error. Data that incorporates economic cross-tabulations is from the American Community Survey 2006-2010. It is not provided below the census tract level due to concerns about sampling error.

2 Defining Racially/Ethnically-Concentrated Areas of Poverty

To assist communities in identifying racially/ethnically-concentrated areas of poverty (RCAPs/ECAPs), HUD PD&R has developed a census tract based definition for RCAP/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: RCAP/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of "extreme poverty" as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are much lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be an RCAP/ECAP if it has a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed RCAPs/ECAPs.

$$RCAP_i = \text{yes} \dots \text{if} \dots \begin{cases} PovRate_i \geq [3 * \mu_{PovRate}^{cbsa}] \\ \text{or} \\ PovRate_i \geq 0.4 \end{cases} \cap \left[\frac{(1 - NHW_i)}{Pop_i} \right] \geq .50$$

Where i indexes census tracts, $(\mu_{povrate}^{cbsa})$ is the metro (CBSA) mean tract poverty rate, $PovRate$ is the i th tract poverty rate, (NHW_i) is the non-Hispanic white population in tract i , and Pop is the population in tract i .

While this definition works well for tracts in metropolitan or micropolitan areas, places outside of these geographies are unlikely to have racial/ethnic concentrations as high as 50 percent. In these areas, the racial/ethnic concentration threshold is set at 20 percent.

3 Analyzing Segregation

To assist program participants in describing the level of residential segregation in their geography, HUD PD&R will construct several common social science indices that measure segregation. These metrics will allow program participants to identify whether their area features high, moderate, or low levels of segregation. The measures described below will be coupled with geospatial presentations of racial/ethnic patterns over time so that program participants can visualize the evolving patterns in their community.

3.1 Dissimilarity index

A primary metric for identifying segregation is the dissimilarity index. A dissimilarity index represents a summary measure of the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block-groups. It is calculated as:

$$D_j^{WB} = \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes census block-groups, j is the j th jurisdiction, W is group one and B is group two, and N is the number of block-groups i in jurisdiction j . By construction, the index is bound between zero and one. A value of zero implies “perfect” integration, achieved if every census tract or block-group mirrors the two groups’ shares in the overall geography. A dissimilarity index of 1 reflects complete segregation, where each tract has exclusively one of the two groups.

PD&R will provide dissimilarity indices at the jurisdiction-level for jurisdictions of similar size in the same census region, and for metropolitan/micropolitan level. At each level, PD&R calculates the index between the relevant racial/ethnic groups and the majority group, disabled populations by disability type relative to non-disabled persons, and the largest immigrant populations and the majority group in a jurisdiction. In addition, to help communities understand how their situation compares with others around the country, PD&R reports will provide a color-coding designation that will signify whether HUD interprets the value as high, moderate, or low. Table 1 is a tentative statistical designation for the dissimilarity index based on an examination of the literature and an inspection of the statistical distributions of these values across these categories.¹

Table 1		
Measure	Values	Description
Dissimilarity Index [min: 0, max: 1]	< 0.40	Low Segregation
	0.41-0.54	Moderate Segregation
	> 0.55	High Segregation

3.2 Isolation Indices

Another common approach to measuring segregation is the isolation index, which compares a group’s share of the overall population in a jurisdiction to the average neighborhood share for members of that group.

¹See Massey and Denton (1993) or Glaeser and Vigdor (1999) for discussion of dissimilarity index values. HUD also examined the various statistical distributions of dissimilarity values across communities. For example, a dissimilarity index of 0.55 represented the 97th percentile of non-white/white segregation for CPD program participant geographies with sufficiently large (>10%) non-white populations using the ACS 05/09 estimates.

For example, suppose a jurisdiction is 20 percent Hispanic/Latino overall, but the average Hispanic/Latino resident of that jurisdiction lives in a neighborhood that is 60 percent Hispanic/Latino - the isolation index for Hispanics in this jurisdiction would take the value 0.4 (0.6-0.2). Similar to the dissimilarity index, the higher the value, the more segregated a community is. The isolation index cannot exceed 1 (or 100, depending on the scaling). Generalizing, for any group (M) in jurisdiction (j) the isolation index is calculated as follows:

$$ISO_M = \frac{\left[\left[\sum_i^N \frac{M_i}{M_j} * \left(\frac{M_i}{T_i} \right) \right] - \frac{M_j}{T_j} \right]}{1 - \frac{M_j}{T_j}}$$

Where (i) indexes block-groups and (T) is the total population in block-group (i) or jurisdiction (j).

The isolation index highly correlates with the dissimilarity index, and while conceptually very similar, it tends to provide a better characterization of residential segregation when minority populations are extremely small.

3.3 Predicted Racial/Ethnic Composition Ratio

For very small communities, there are generally too few census block-groups or minorities for statistical metrics such as a dissimilarity index or even the isolation index to be particularly informative. Instead, for these communities, PD&R calculates a predicted value for the racial/ethnic minority share for a jurisdiction and compares this to the actual composition. Predicted values are based on a metropolitan/micropolitan area's income distribution by race and ethnicity. For a jurisdiction, the metro-level racial share for each income category is multiplied by the number of households the jurisdiction has in that category. The totals are summed to determine the predicted number of minorities in a jurisdiction. This total is then compared with the actual number of minorities in a community by calculating a ratio of actual to predicted. For any jurisdiction j , the predicted total for subgroup M is defined as \widehat{M} , it is the number of households (H) in household income category l in jurisdiction j , multiplied by the metropolitan area (k) share of subgroup M in household income category l , summed across all income categories l to N :

$$\widehat{M}_j = \sum_l^N H_{lj} * \left[\frac{M_{lk}}{H_{lk}} \right]$$

Ratios near 1 indicate that the jurisdiction is close to its predicted level of minority composition. Those far less than 1 show that the jurisdiction has many fewer minorities than one might expect given income levels. Table 2 presents a stylized example of this procedure for two hypothetical jurisdictions in the same metropolitan area. As is clear, jurisdiction A has a non-white population far below what might be expected. The non-white population in jurisdiction B is close to what one might expect. Table 3 characterizes the value ranges of the measure.

Table 2

Panel A. Hypothetical Jurisdiction A					
Income category	Metro area racial share	Total jurisdiction population	Predicted racial pop.	Actual racial pop.	Actual/Predicted ratio
Less than \$50,000	0.32	10,000	3,200	1,300	
\$50,000 to \$100,000	0.34	6,000	2,040	500	
Greater than \$100,000	0.28	2,000	560	200	
Total			5,800	2,000	0.3448

Panel B. Hypothetical Jurisdiction B					
Income category	Metro area racial share	Total jurisdiction population	Predicted racial pop.	Actual racial pop.	Actual/Predicted ratio
Less than \$50,000	0.32	10,000	3,200	3,400	
\$50,000 to \$100,000	0.34	6,000	2,040	2,280	
Greater than \$100,000	0.28	2,000	560	400	
Total			5,800	6,080	1.0483

Note: This table is illustrative, the income categories presented here are notional.

Table 3

Measure ²	Values (Ratio of predicted non-white share over actual non-white share)	Description
Predicted Racial/Ethnic Composition	0.0-50%	Non-White Share Extremely Below Predicted
	50-70%	Non-White Share Moderately Below Predicted
	70-90%	Non-White Share Slightly Below Predicted
	90-110%	Non-White Share Approximates Predicted
	110%+	Non-White Share Above Predicted

4 Analyzing Community Asset Indicators

HUD has developed a two-stage process for analyzing disparities in access to community assets. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important community assets such as education, employment, and transportation, among others. This stage uses metrics that rank each neighborhood along a set of key dimensions. In the second stage, HUD combines these dimension rankings with data on where people in particular subgroups live to develop a measure of that group's general access or exposure to each asset dimension. These summary measures can then be compared across subgroups to characterize disparities in access to community assets. HUD considers community assets a multi-dimensional notion. To focus the analysis, HUD developed methods to quantify a select number of the important "stressors" and "assets" in every neighborhood. These dimensions were selected because existing research suggests they have a bearing on a range of individual outcomes. In particular, HUD has selected six dimensions upon which to focus:

- Neighborhood School Proficiency
- Poverty
- Labor Market Engagement
- Job Accessibility
- Health Hazards Exposure
- Transit Access

Invariably, these dimensions do not capture everything that is important to the well-being of individuals and families. In quantifying indicators of access to community assets, HUD is not making a definitive assessment of one’s life chances based on geography. HUD is quantifying features of neighborhoods for the purpose of assessing whether significant disparities exist in the spatial access or exposure of particular groups to these quality of life factors. While these important dimensions capture a number of key concepts identified by research as important to quality of life, the measures are not without limitations. PD&R constrained the scope of HUD-provided items to those that are closely linked to neighborhood geographies and could be measured consistently at small area levels across the country. For example, HUD’s measure of school performance only reflects elementary school proficiency. It does not capture academic achievement for higher grades of schooling, which are important to a community’s well-being, but likely less geographically-tied to individual neighborhoods than elementary schools. Similarly, the health hazard exposure measure only captures outdoor toxins, missing indoor exposures. The national-availability restriction is a necessity given that all HUD program participants must complete an Assessment of Fair Housing. HUD realizes that there are other assets and stressors that are relevant, such as neighborhood crime or housing unit lead and radon levels. However, these lack consistent neighborhood-level data across all program participant geographies. As a consequence, HUD encourages program participants to supplement the data it provides with robust locally-available data on these other assets and stressors so that the analysis is as all-encompassing as possible. Each dimension is described below.

4.1 Neighborhood School Proficiency Index

The neighborhood school proficiency index uses school-level data on the performance of students on state exams to describe which neighborhoods have high-performing elementary schools and which have lower performing elementary schools. The proficiency index is a function of the percent of elementary school students proficient in reading (r) and math (m) on state test scores for the i th school associated with the neighborhood ($i = 1, 2, ..n$) where N is the maximum number of schools in any block-group in the state-distribution, and school enrollment s :

$$School_i = \sum_i^N \left(\frac{s_i}{\sum^n s_i} \right) * \left[\frac{1}{2} * r_i + \frac{1}{2} * m_i \right]$$

Elementary schools are linked with block-groups based on a geographic mapping of attendance area zones from School Attendance Boundary Information System (SABINS), where available, or within-district proximity matches of up to the three closest schools within a mile. In cases with multiple school matches, an enrollment-weighted score is calculated following the equation above.

4.2 Poverty Index

HUD created a simple poverty index to capture the depth and intensity of poverty in a given neighborhood. The index uses family poverty rate and public assistance receipt³ to operationalize both aspects. The index is a linear combination of two vectors: the family poverty rate (pv) and the percentage of households receiving public assistance (pa).

³Public assistance is cash-welfare, such as Temporary Assistance for Needy Families (TANF).

$$POV_i = \left[\left(\frac{pv_i - \mu_{pv}}{\sigma_{pv}} \right) - 1 \right] + \left[\left(\frac{pa_i - \mu_{pa}}{\sigma_{pa}} \right) * -1 \right]$$

Where means (μ_{pv}, μ_{pa}) and standard errors (σ_{pv}, σ_{pa}) are estimated over the metropolitan area distribution or balance of state in non-metros.

4.3 Job Access Model

The job access index summarizes the accessibility of a given residential neighborhood as a function of its distance to all job locations, with distance to larger employment centers weighted more heavily. Specifically, a gravity model is used, where the accessibility (A_i) of a given residential block-group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. More formally, the model has the following specification:

$$A_i = \frac{\sum_{j=1}^n E_j d_{ij}^{-2}}{\sum L_j}$$

Where i indexes residential locations and j indexes job locations, and distance, d , is measured as “as the crow flies” between block-groups i and j . E represents the number of jobs in tract j and L is the number of workers.

4.4 Labor Market Engagement Index

The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in that neighborhood. Formally, the labor market engagement index is a linear combination of three standardized vectors: unemployment rate (u), labor-force participation rate (l), and percent with bachelor’s or higher (b), using the following formula:

$$LBM_i = \left[\left(\frac{u_i - \mu_u}{\sigma_u} \right) * -1 \right] + \left(\frac{l_i - \mu_l}{\sigma_l} \right) + \left(\frac{b_i - \mu_b}{\sigma_b} \right)$$

Where means (μ_u, μ_l, μ_b) and standard errors ($\sigma_u, \sigma_l, \sigma_b$) are estimated over the metropolitan area distribution or balance of state in non-metros.

4.5 Environmental Health Hazard Exposure Index

HUD has constructed a health hazards exposure index to summarize potential exposure to harmful toxins at a neighborhood level.⁴ Potential health hazards exposure is a linear combination of standardized EPA estimates of air quality carcinogenic (c), respiratory (r) and neurological (n) with⁵ i indexing census tracts.

$$HazExp_i = \left[\left(\frac{c_i - \mu_c}{\sigma_c} \right) + \left(\frac{r_i - \mu_r}{\sigma_r} \right) + \left(\frac{n_i - \mu_n}{\sigma_n} \right) \right] * -1$$

Where means (μ_c, μ_r, μ_n) and standard errors ($\sigma_c, \sigma_r, \sigma_n$) are estimated over the metropolitan area distribution or balance of state in non-metros.

4.6 Transit Access

HUD has constructed a transit access index where available data exists to support local analysis. HUD uses data on over 200 transit agencies that provide data through GTFS Exchange (<http://www.gtfs-data-exchange.com/>) to assess relative accessibility within metro areas (or balance of state). The appendix contains a list of metropolitan areas where GTFS data was available and used. The GTFS-based accessibility

⁴HUD anticipates deriving detailed health hazard exposure data from EPA’s to-be-released C-FERST tool when available.

⁵See www.epa.gov/tri to learn more about the NATA program.

index is designed to model relative accessibility to amenities via bus or trains within a metro. Because standardized data on the location of amenities is not uniformly available at a granular level, HUD uses the number of jobs in retail (NAICS 44-45), arts entertainment & recreation (NAICS 71), and food & accommodations (NAICS 72) as proxies for the magnitude of amenities at the block-group level from the Local Employment Dynamics dataset published by the Census Bureau⁶. First, HUD identified the number of jobs in these sectors within 1/2 mile of each bus stop and 3/4 mile of each rail transit stop and summed them. Then for each trip in the transit system, HUD calculated a stop-specific measure of the additional amenities accessed in each ensuing stop on that route, which it then divided by (deflated) the additional travel time to each ensuing stop. Mathematically, this can be expressed in several terms.

Let (s_{ij}) represent the accessibility of stop i on trip j , a is the amenity radius of a stop (the total jobs mentioned above), and T is the marginal travel time with each stop. Each stop of each trip takes on a value equal to the sum of the amenity radius of each ensuing stop divided by the time to that next stop for all stops on a trip.

$$s_{ij} = \sum_i^N \frac{a_{i+1}}{T_{i+1}}$$

These stop-journey specific (s_{ij}) values are then summed over all journeys j (where journeys in opposite directions are counted as two trips) made in 24-hours to create a single aggregate accessibility value for each stop in the system (where k is the total stops in the system).

$$A_i = \sum_j^k s_{ij}$$

To translate these stop accessibility values (A_i) to block-groups, HUD then calculates the distance between each stop and the population-weighted centroid of each block-group. The three highest accessibility stops within 3/4 of a mile are summed to generate a block-group value for accessibility. Finally, these values are placed into decile (10-percentile) buckets within-metro or balance of state, and are scaled up by a factor of 10 to align with the other indices. Block-groups that are not within 3/4 of a mile of either a bus or transit stop are normalized to a value of 1 – the lowest accessibility score. For communities with fixed rail, but no available GTFS data, HUD calculates a simple access measure as the distance of the block-group centroid to the nearest fixed-rail.

4.7 Sources

Table 3 below details the sources of each data point.

Table 3

Community Asset Dimensions	Input Variables	Source
Poverty Index	Family Poverty Rate	ACS 2006-2010
	Pct. Households Receiving Public Assistance	ACS 2006-2010
Neighborhood School Proficiency Index	School Math Proficiency / State Math Proficiency	Dept. of Education
	School Reading Proficiency / State Reading Proficiency	Dept. of Education
Labor Market Engagement Index	Unemployment Rate	ACS 2006-2010
	Labor force Participation Rate	ACS 2006-2010
	Pct. with a Bachelor's or higher	ACS 2006-2010
Job Access Index	block-group-level Job Counts	LED, 2010
	block-group-level Job Worker Counts	LED, 2010
	Distance	GIS-Derived
Rail Transit Access Index	Estimated Distance to Rail and Bus Stops	GTFS
Health Hazards Exposure Index	NATA 2005	EPA, 2005

⁶For states without Work Area Characteristics files in the LED data, population was used as a proxy.

4.8 Access or Exposure to Community Assets

To identify disparities in access to community assets, HUD PD&R calculates exposure indices for each asset dimension across a range of subgroups, including protected classes as identified in the Fair Housing Act. The exposure index calculates a weighted average for a given characteristic. The generic access for subgroup M to asset dimension R in city j is calculated as:

$$Exp_M^R = \sum_i^N \frac{M_i}{M_j} * R_i$$

Where *i* indexes block-groups in city *j* for subgroup *M* to dimension *R*. Again, *N* is the total number of block-groups in city *j*.

It is useful to provide an example of this in practice (Table 4). Consider a hypothetical jurisdiction with three neighborhoods. Given the poverty dimension values and population distributions as shown (and abstracting away from the percentiles for the moment), one can calculate the total group score for both white and Hispanic children using the exposure index formula. The results indicate that there is a disparity between white children and Hispanic children with respect to poverty, with Hispanic children on average exposed to higher poverty levels.

Neighborhoods	Dimension	White Children			Hispanic Children		
	Poverty Index Value	White Children Pop	Share	Exposure Index [(1)*(3)]	Hispanic Children Pop	Share	Exposure Index [(1)*(6)]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
A	80	400	0.4	32	100	0.2	16
B	50	400	0.4	20	150	0.3	15
C	20	200	0.2	4	250	0.5	10
Total		1000	1	56	500	1	41

Using these exposure indices, it's possible to compare the access or exposure to the above asset dimensions across protected classes and identify disparities. Column 4 illustrates the exposure index calculation for white children, with a summary value of 5.6. The corresponding value for Hispanic children is 4.1. Disparity values are calculated as the simple difference in average exposure to a given asset dimension across two groups. In the example above, the disparity between white and Hispanic children in exposure to poverty is -15 (41-56=-15).

To account for differences in household income across groups, PD&R also provides these exposure indices across protected classes for persons in poverty. This assists jurisdictions in understanding whether there are differences in exposure to community assets across groups that cannot be explained by differences in income.

PD&R provides these exposure calculations for each non-white group (overall and in poverty) and the disparity relative to the white population (overall and in poverty). PD&R also calculates basic significance tests (at the 0.05 significance level) to identify whether these disparities are statistically discernible from random noise.

5 Disproportionate Housing Needs

To assist communities in describing disproportionate housing needs in their geography, HUD is providing data which identifies instances when the incidence of housing problems are measurably higher for members of racial or ethnic groups than for the population as a whole. These measures are the same as those required in the data analysis associated with the Consolidated Plan.

These data are drawn from the Comprehensive Housing Affordability Strategy (CHAS) data, which demonstrate the extent of housing problems and housing needs, particularly for low-income households. The CHAS data are produced for HUD via custom tabulations conducted by the U.S. Census Bureau using Census products.

A disproportionate housing need is defined as a circumstance when the members of racial or ethnic group within an income level experience housing problems at least 10 percentage points more frequently than the entire population at that income level. Four housing problems are considered:

- Lacks complete kitchen facilities
- Lacks complete plumbing facilities
- More than one person per room
- Cost Burden - monthly housing costs (including utilities) exceed 30 percent of monthly income

This data will be provided for four income categories: 0-30 percent of area median family income (AMI), 30-50 percent of AMI, 50-80 percent of AMI, and 80-100 percent of AMI. Additionally, HUD will provide a subset of “severe” housing problems, defined as:

1. Lacking complete kitchen facilities
2. Lacking complete plumbing facilities
3. More than 1.5 persons per room
4. Severe Cost Burden - monthly housing costs (including utilities) exceed 50 percent of monthly income

This data will report on the percentage of households in each category that have housing problems by race. Those cases where the difference in percentage exceeds 10 percentage points are deemed to indicate disproportionate housing needs.

For example, consider a community in which 60 percent of all low-income households with incomes between 50 and 80 percent of the area median family income within a jurisdiction have a housing problem and 70 percent of low-income Hispanic households with incomes between 50 and 80 percent of the area median family income within that jurisdiction have a housing problem. In this case, low-income Hispanic households are considered to have a disproportionate housing need.

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