

## SECTION VIII.

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### GOALS AND ACTION ITEMS

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## Goals and Action Items

This section discusses the goals and action steps the Central Texas Regional AI partners will take to address fair housing and economic opportunity barriers. It provides action items for individual jurisdictions, as well as joint goals to address challenges that are prevalent across the region.

### Considerations in Action Item Development

The AI examines the many factors that contribute to equal housing choice and access to opportunity in the Central Texas region. Many of the barriers are difficult to address and will require long-term regional solutions and resource commitments. Some are easier to address and can be accomplished quickly. In determining which challenges should be tackled first, and where resources should be allocated, the participating partners considered the following:

**Disproportionate needs.** It is very important to note that many of the most significant challenges in the region affect residents who are “under” and “less” resourced compared to other residents. This is very often the result of historical patterns of segregation, denial of homeownership opportunities (a key component of wealth building in this country), limited access to good quality schools, and discrimination in both employment and housing markets. In many cases, these residents are also disproportionately likely to be racial and minorities, residents who have limited English, residents with disabilities, large families, and children living in poverty.

Residents with disproportionate needs and limited resources were given the most consideration in crafting solutions.

**Prioritization of fair housing issues.** Prioritization of the fair housing issues was guided by HUD’s direction in the Assessment of Fair Housing (AFH) rule, as the AI guidance provides less direction on prioritization. In prioritizing the contributing factors to address, highest priority was given to those contributing factors that, for one or more protected classes:

- Limit or deny fair housing choice;
- Limit or deny access to opportunity; and
- Negatively impact fair housing or civil rights compliance.

## Housing Barriers and Contributing Factors

The primary housing barriers—and the factors that contributed to those barriers—identified in the research conducted for this AI include the following. Where protected classes are disproportionately impacted, those are noted.

### **Barrier: City and County capacity for addressing fair housing challenges is limited.**

Contributing factor: The growing housing crisis throughout the region is taxing city, county, and housing authority staff, as they work to implement new programs and policy changes to address housing needs. Implementing the type of ambitious plan that is needed will require additional capacity.

### **Barrier: The harm caused by segregation is manifested in disproportionate housing needs and differences in economic opportunity.**

Contributing factors: Past actions that denied housing opportunities and perpetuated segregation have long limited opportunities for many members of protected classes. This continues to be evident in differences in poverty rates, homeownership, and access to housing throughout the region.

Disproportionate impact: Differences in poverty are highest in areas where early policies to limit where people of different races and ethnicities could live: e.g., in Austin, Taylor, and Travis County. African American and Hispanic families have poverty rates averaging 17 percentage points greater than Non-Hispanic White and Asian families. The homeownership gap between Black and Non-Hispanic White households is close to 20 percentage points in many jurisdictions.

### **Barrier: Affordable rental options in the region are increasingly limited.**

Contributing factors: Growth in the region—particularly demand for rental housing—has increasingly limited the areas where low income households can live affordably. This perpetuates the limited economic opportunity that began with segregation. For Housing Choice Voucher holders, the state law that prohibits cities and counties from including Source of Income as a protected class is also a contributing factor. Voucher holders have fewer options for using their vouchers than five years ago and landlords have no requirement or incentive to accept voucher holders; voucher holders also report the highest levels of segregation in the region. The only areas in the region where the local rent is lower than or equivalent to what HUD will pay are in southeast Austin, Taylor, Georgetown, and parts of rural Williamson County.

Disproportionate impact: Housing choice voucher holders, many of whom are residents of color. Also, households who are dependent on public transportation and need housing in certain areas in order to access jobs, schools, and services. This includes very low income residents, refugees, and residents with disabilities.

**Barrier: Stricter rental policies further limit options.**

Contributing factors and disproportionate impacts: 1) “3x income requirements” for rental units have a discriminatory effect on persons with disabilities whose income is primarily Social Security and Disability Insurance (SSDI), as well as renters who receive income from “unearned” sources such as child support. 2) Onerous criminal look back periods that do not take into account severity of a crime or time period in which it was committed disproportionately impact persons of color and persons in recovery. 3) State law that prohibits cities and counties from including Source of Income as a protected class prevents units of local government from allowing renters to claim legal unearned income as eligible for the 3x income threshold.

**Barrier: Disparities in the ability to access homeownership.**

Contributing factors: Past actions that have limited economic opportunity for certain residents, as well reluctance to lend in lower income neighborhoods, which are often neighborhoods with people of color, have contributed to differences in the ability to secure a mortgage loan.

Disproportionate impact: Denial rates for Black/African American applicants (24%), Hispanic applicants (20%) and other non-Asian minorities (17%) are significantly higher than for non-Hispanic white applicants (11%) and Asian applicants (11%).

**Barrier: State regulations and zoning and land use limit housing choice.**

Contributing factors: State regulations prohibit or limit the power of local governments to implement zoning (counties) and inclusionary zoning (cities and counties) that could increase the supply of affordable housing, benefitting the protected classes that have disproportionate housing needs.

Some local units of government have vague regulations regarding treatment of group homes and do not allow a wide variety of densities that could facilitate affordable housing options. Although the analysis in this report did not find local limits to be significant barriers to housing for protected classes, they could be improved to increase transparency and expand housing choice.

**Barrier: Educational Inequities persist in the region.**

In the region, African American children are significantly overrepresented in failing high schools, and Hispanic children have largest disparities in school quality across K-12 schools.

Contributing factors: School district boundaries that are neighborhood-driven and do not truly accommodate open choice drive up housing prices in quality school neighborhoods.

## **Barrier: Public transportation access has not kept up with growth.**

Contributing factors: In addition to lack of affordable housing, lack of public transportation was the most common barrier to economic opportunity mentioned by residents in the outreach conducted for the AI. Lack of resources in outlying areas to address demand for better transportation is a contributing factor, as is the decline in affordable options in areas of the region where jobs are clustered. The lack of transportation options affects all types of residents who must commute and especially people who cannot drive or afford to drive—people with disabilities and refugees, as well as residents living in Pflugerville and CDBG service areas in Travis County, mentioned this barrier the most.

## **Solutions**

This section summarizes proposed solutions to addressing the contributing factors discussed above.

**Implementation.** As the participating partners worked together to explore solutions for housing barriers, it became clear that existing staff are resource constrained and already committed to workplans to respond to the growing housing crisis. Without expanded resources, the region will have difficulty implementing many of the recommended solutions to contributing factors, particularly the most ambitious (and usually the most impactful) action items.

The participating partners also recognized the need for formation of a regional body that can oversee implementation of regional goals. To that end, the first step in implementing the work plan is creation of a Central Texas Regional Fair Housing Working Group. The role of this group will be to implement regional policy initiatives—and to support local initiatives.

## **Formation of a Central Texas Regional Fair Housing Working Group**

**Action Item 1.** Establish a Central Texas Regional Fair Housing Working Group (Working Group) made up of staff from each of the 10 entities to collaborate and coordinate on implementation of regional fair housing goals and affordable housing interests. The group will also consult with area experts on housing equity and economic opportunity, K-12 educational leaders, local and regional transit providers, and public works staff. This Group will be facilitated by a Travis County Health and Human Services employee team. The group will meet quarterly, and be governed by a group charter and 5 year work plan that will be established to guide the work of the Group. They will produce a progress report annually (that can be folded into jurisdiction CAPERs) that will have a 30-day public comment and review.

Subsequent action items include the following, which would be overseen by the Working Group, except when they are jurisdiction specific.

## Proposed Action Items

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>REGIONAL ACTION ITEMS</b>				
1	Establish a Central Texas Regional Fair Housing Working Group (Working Group) made up of staff from each of the 10 entities to collaborate and coordinate on implementation of regional fair housing goals and affordable housing interests. The Group will consult with area experts on housing equity and economic opportunity, K-12 educational leaders, local and regional transit providers, and public works staff. This Group will be facilitated by a Travis County Health and Human Services employee team. The group will meet quarterly, and be governed by a group charter and 5 year work plan that will be established to guide the work of the Group. They will produce a progress report annually (that can be folded into jurisdiction CAPERS) that will have a 30-day public comment and review.	Capacity limitations to implement fair housing action items that are impactful and long-lasting.	Lead: Travis County HHS. Membership from all Central Texas Regional AI participating partners	0-3 months: identify members and initial workplan; 3-6 months: hold first meeting and develop a group charter; 1-5 years: establish workplan and achieve short term goals outlined in this Fair Housing Plan.
2	Explore the feasibility to create a regional resource network for downpayment assistance programs that are affirmatively marketed to under-represented homeowners.	Past government actions that denied equal access to homeownership. Existing disparities in ownership by race and ethnicity. Existing disparities in mortgage loan approvals. Gaps in information about housing opportunities.	Part of Working Group workplan	As part of Working Group work plan, explore the improvement of an active marketing and uniformity of downpayment assistance program information. Explore possible funding sources to determine the development of an affirmative marketing plan and plan to provide homeowner assistance with forms/applications targeting under-represented residents. If implemented, have a pilot program in operation within the next five years.
3	Working with foundations and private partners, explore and possibly create a regional multifamily rehabilitation and accessibility improvement program to provide an incentive for landlords to rent to persons with disabilities, refugees and others with similar limited rental histories or unearned sources of income, voucher holders, and/or residents with criminal history.	Disparities in housing cost burden, displacement, increasingly limited neighborhoods in which to use Housing Choice Vouchers, and availability of rental housing to accommodate needs associated with disability, language access, national origin, and rental history. Lack of Source of Income protection (prohibited by the State) and disparate impact of 3x rent rule on certain households.	Part of Working Group workplan	As part of Working Group work plan, convene focus groups with small landlords to explore an incentive package. Determine interest and level of funding required. Explore possible funding sources to determine feasibility of acquiring funds to achieve goal. Depending on results of feasibility study, develop a proposal to funders.

## Proposed Action Items (Continued)

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>REGIONAL ACTION ITEMS</b>				
4	Collaborate to explore the feasibility to fund fair housing testing to better understand the prevalence and impact of "3x rent" eligibility policies in rental housing and the intersection of those policies and refusal to accept unearned income such as child support and disability payments.	Disparities in housing cost burden, displacement, increasingly limited neighborhoods in which to use Housing Choice Vouchers, and availability of rental housing to accommodate needs associated with disability, language access, national origin, and rental history.	Part of Working Group workplan	As part of Working Group work plan, explore possible funding sources to determine feasibility of acquiring funds to achieve goal. Depending on results of feasibility study, develop a proposal to funders to fund testing in 3x rent policies that examine the potential of a disparate impact on persons with disabilities and families with children.
5	Explore the feasibility and funding options, through a public-private partnership with area marketing firms, to establish a replicable affirmative marketing program and guiding principles for developers of rental housing, leasing agents and property managers, homebuilders, and real estate agents. This may include a marketing strategy to address Not-in-My-Backyard Syndrome (NIMBYism) in the region. Require that these plans be used in developments receiving public funds and/or development incentives.	Disparities in housing cost burden, increasingly limited neighborhoods in which to use Housing Choice Vouchers.	Part of Working Group workplan	As part of Working Group work plan, explore possible funding sources to determine feasibility of acquiring funds to achieve goal. Depending on results of feasibility study, develop a proposal to funders to establish a replicable marketing affirmative marketing program and guiding principles for developers of rental housing, leasing agents and property managers, homebuilders, and real estate agents.
<b>TRAVIS AND WILLIAMSON COUNTIES ACTION ITEMS</b>				
1	Receive clarification from the State that health and safety, accessibility improvements and weatherization do not count as improvements that could result in changes to the homeowners' property tax exemptions (School Tax Ceiling).	Identified as a major barrier to home improvements and housing conditions in rural parts of counties.	Travis County	0-6 months, receive clarification and communicate information to homeowners.
2	Actively market the availability of the homestead exemption and property tax deferral option through social service and advocacy organizations, trusted parties (church leaders, community organizers), community and senior centers, and social media to increase awareness of the exemption and build partnerships with community groups.	Displacement related to property tax increases; Lack of understanding by residents on exemptions, particularly when homes are inherited.	Travis County and Williamson Counties through Tax/Assessor Offices	Within 6 months, develop a presentation and outreach strategy to partner organizations. Present at organizational meetings, circulate through social media.

## Proposed Action Items (Continued)

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>CITY OF AUSTIN ACTION ITEMS</b>				
1	Raise awareness at the state level about the negative impacts of 3x rent (ability to pay) rules on persons reliant on unearned income that is not counted toward this rule by landlords. Monitor growing support for Source of Income protections at the federal level and among like-minded states.	Disparities in housing cost burden, displacement, increasingly limited neighborhoods in which to use Housing Choice Vouchers, and availability of rental housing to accommodate needs associated with disability, language access, national origin, and rental history.	City of Austin	Ongoing; raise awareness through the City Intergovernmental Relations Office, city leadership and city advocacy groups, and communication with receptive leaders at the state level.
2	Implement Displacement Mitigation Strategies and Housing Blueprint action items that are related to Disproportionate Housing Needs identified in this AI. Continue to direct resources to addressing disproportionate needs.	Displacement which disproportionately affects: African Americans, persons of Hispanic descent, Native Americans, persons with disabilities, large families.	City of Austin	Metrics and milestones will align with the City's Strategic Housing Blueprint and displacement mitigation strategies. Specific strategies will include: 1) Prioritize City-subsidized affordable units that are appropriately sized for households or are at risk or experiencing displacement; 2) Increase participation of communities of color in funding investment recommendations and include cultural displacement in decision making; 3) Incorporate robust tenant protections in City-supported housing; 4) Expand density bonus programs to serve < 60% AMI households; 5) Affirmatively market NHCD-subsidized properties to people of color in gentrifying areas; 6) Pilot a neighborhood-based process to mitigate displacement by better connecting people of color with resources to mitigate displacement which could include: an affordable unit database, connecting eligible homeowners with property tax exemptions, connecting tenants facing displacement with assistance, expanding home repair programs in gentrifying areas, supporting assistance to tenants facing eviction, land banking in gentrifying areas, increasing fair housing enforcement and education.
3	Through the Working Group, provide leadership and technical assistance to regional partners as they explore similar approaches. This will include the effectiveness of the equity and inclusion framework currently being implemented within City of Austin departments.	Capacity limitations to implement fair housing action items that are impactful and long-lasting.	City of Austin	To be determined.



## Proposed Action Items (Continued)

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>CITY OF AUSTIN ACTION ITEMS</b>				
4	Encourage developers and landlords who benefit from public funding and development incentives to adopt reasonable policies on tenant criminal history, accept legal unearned income in consideration of the ability to pay rent, and not discriminate based on source of income.	Disproportionate effect of 3x rent income requirements and criminal history policies on persons with disabilities, single parents, persons in recovery (considered by the Federal Fair Housing Act as having a disability).	All jurisdictions as part of funding allocations	Developers' policies should align with the best practices in the Reentry Roundtable guide.
5	Bring forward the recommendation that incentives for the development of affordable housing for households below 50%, 60% and 80% MFI be included in Land Development Code revisions.	Lack of affordable housing disproportionately impacting protected classes with lower incomes and higher poverty rates. Lack of affordable housing citywide exacerbates segregation created through historical policies and practices. The city is limited in its ability by state law to use inclusionary zoning as a tool to broaden housing choice.	City of Austin	Staff will monitor and modify the Density Bonus program to ensure it will create a quantifiable increase in long-term, on-site affordable units, of which a minimum of 10% are accessible. As part of that monitoring, staff will collect data on protected classes and families with children residing in units created through the City's density bonus and other incentive programs.
6	Bring forward recommendations to modify land use and regulatory requirements that could expand housing choice and reduce housing access barriers through Land Development Code process.	Overly complex land use regulations limit housing choice and create impediments to housing affordability. These include: minimum site area requirements for multifamily housing, limits on accessory dwelling units, compatibility standards, overly restrictive neighborhood plans and excessive parking requirements.	City of Austin	TBD; part of Land Development Code revisions.
7	Bring forward recommendations to modify VMU and PUD ordinances to require 60% MFI rental and 80% owner throughout Austin when on-site affordable units are required.	Lack of affordable housing disproportionately impacting protected classes with lower incomes and higher poverty rates. Lack of affordable housing citywide exacerbates segregation created through historical policies and practices. The city is limited in its ability by state law to use inclusionary zoning as a tool to broaden housing choice.	City of Austin	Staff will collect data on protected classes and families with children residing in units created through VMU and PUD programs.

## Proposed Action Items (Continued)

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>CITY OF AUSTIN ACTION ITEMS</b>				
8	Conduct an analysis and calibration of S.M.A.R.T. Housing Incentives to function in high opportunity	Difference in access to opportunity for protected classes.	City of Austin	To be determined.
9	Increase transparency of monitoring of existing accessible units to ensure consistency.	The City's historical lack of enforcement of city codes governing the maintenance of housing stock in different neighborhoods disproportionately impacts protected classes, influences housing preferences and restricts access to opportunities.	City of Austin	To be determined.
10	The City's efforts to institute cross-departmental planning will include a focus on improvement of infrastructure and housing development in areas of minority/low-income concentration and integration of housing for different incomes in these areas.	The City's historical lack of enforcement of city codes governing the maintenance of housing stock in different neighborhoods disproportionately impacts protected classes, influences housing preferences and restricts access to opportunities.	City of Austin	To be determined; may be integrated into regional work plan.
11	Collaborate with partners and disseminate data to develop an online list and map of units created through city incentives and developer agreement programs to increase information available to members of protected classes.	Information on housing choice is not widely available in languages other than English and/or in accessible formats. No information is available to people who are members of protected classes about possibilities to live in housing that was created in higher opportunity areas through city incentive and developer agreement programs.	City of Austin	To be determined.
12	Improve connections between low income populations and employment opportunities	Disparities in access to opportunity (access to healthy food, quality schools, transit, sidewalks, safe neighborhoods) that affect African Americans, persons of Hispanic descent, Native Americans, persons with disabilities, large families and families with children. Disproportionate housing needs in general.	City of Austin	Staff will bring this barrier and its impacts to the attention of the City of Austin representatives on the Capital Metro board of directors.

## Proposed Action Items (Continued)

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>TRAVIS COUNTY ACTION ITEMS</b>				
1	<b>Improve living conditions for low income populations, among which members of protected classes are heavily represented</b>	Disparities in access to opportunity (access to healthy food, quality schools, transit, sidewalks, safe neighborhoods) that affect: African Americans, persons of Hispanic descent, Native Americans, persons with disabilities, large families and families with children.	All County Departments and Travis County Commissioners Court	0-5 years: Continue to invest HUD block-grant funds and other County, bond, and grant funds to provide improvements in high poverty areas. 3-5 years: Prioritize investments to expand services through new investment and furthering a regional approach to geographically targeted investments.
2	<b>Balance the revitalization of areas of concentrated poverty with the expansion of affordable housing opportunities elsewhere</b>	Disparities in access to opportunity (access to healthy food, quality schools, transit, sidewalks, safe neighborhoods) that affect: African Americans, persons of Hispanic descent, Native Americans, persons with disabilities, large families and families with children. Disproportionate housing needs in general.	All County Departments and Travis County Commissioners Court	0-9 months: Create an asset opportunity map that can be updated regularly to inform changing opportunity and investment strategies. 1-5 years: Prioritize investments to new affordable housing in non-poverty areas of moderate to high opportunity or non-poverty in transition to moderate to high opportunity.
3	<b>Set a goal for development of a range of affordable units in coordination with other regional jurisdictions. Commit to increasing the supply of a diversity of housing types, including missing middle housing, throughout the county</b>	Disparities in housing cost burden, displacement, increasingly limited neighborhoods in which to use Housing Choice Vouchers, and availability of rental housing to accommodate needs associated with disability, language access, national origin, and rental history.	All County Departments and Travis County Commissioners Court	3-9 months: Create housing goals as an outcome of the County's housing market analysis; 9-12 months: begin implementation. 2-5 years: Achieve a greater dispersion of affordable rental and for sale housing in high opportunity areas by "strategic land banking"; identifying opportunities for land acquisition, repurposing public land for housing development, supporting infrastructure.
4	<b>Improve connections between low income populations and employment opportunities to mitigate impacts of displacement outside the urban core</b>	Disparities in access to opportunity (access to healthy food, quality schools, transit, sidewalks, safe neighborhoods) that affect: African Americans, persons of Hispanic descent, Native Americans, persons with disabilities, large families and families with children. Disproportionate housing needs in general.	All County Departments and Travis County Commissioners Court	Ongoing: Continue to collaborate with transit providers to create innovative solutions that serve particular neighborhood connection needs; Prioritize investment criteria to incentivize affordable housing development on major corridors with public transit service; Support and coordinate with the recommendations outlined in Travis County's 2019 Economic Development Strategy Implementation specifically with regard to connectivity to job centers.

## Proposed Action Items (Continued)

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>ROUND ROCK, Pflugerville, Georgetown, Travis, and Williamson Counties Action Items</b>				
1	Nurture and drive job growth, commercial and retail development, and supportive services to quickly developing micro-economies in more affordable suburban areas in existing growth plane. Engage employers in discussions about affordable housing needs to build the potential for public-private partnerships	Residents with lower access to opportunity and a history of barriers to economic opportunity than residents in the region overall: African Americans, persons of Hispanic descent, refugees, LEP residents, families with children living in poverty.	All jurisdictions	Implement as part of newly improved economic development strategies and implementation plan (under development in Travis County) and in accordance with Travis County's Land Water Transportation Plan.
2	Further a regional transportation vision, focusing on efficient commutes and reducing traffic in and out of Austin. Affirm that "accessible" transportation is more than ADA compliant buses and stops. The type of accessibility needed is the ability for people with health issues to not have to walk/roll too far to a stop, to have shade and benches where wait times typically exceed a certain threshold, and the first and last mile connections from each stop to destinations are ADA compliant.	Transportation barriers to disability and access; access to employment near affordable housing for low and moderate income residents, especially African Americans and residents of Hispanic descent; who have the highest disparities in job proximity access.	All jurisdictions	Travis County will continue to implement its Transit Development Plan and continue to promote Project Connect.
3	Review and make zoning code updates recommended in zoning and land use analysis section	Disproportionate housing needs; disparities in housing choice related to land use regulations and limitations on diverse	All jurisdictions	Develop draft text amendments within 6 months; implement within 18 months.
4	Commit to fostering a culture of inclusion for residents with disabilities, including ensuring that equity initiatives include residents with disabilities; reviewing websites and other communications for ease of finding information pertinent to residents with disabilities, increasing resources at jurisdiction festivals and events (i.e., accessible parking spaces, shuttles, other accommodations), and other efforts to signal that people with disabilities are a valued part of the community. Consider adding a Disability and Access component into Master/General Plans	Barriers to disability and access.	All jurisdictions	Develop a workplan to accomplish within 3 months of the finalization of the AI and Consolidated Plans; implement action item within 18 months.

## Proposed Action Items (Continued)

ROW #	FAIR HOUSING ACTIONS	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>ROUND ROCK, Pflugerville, Georgetown, Travis, and Williamson Counties Action Items</b>				
5	Require developers and landlords who receive public funding and development incentives to adopt reasonable policies on tenant criminal history, accept legal unearned income in consideration of the ability to pay rent, and do not discriminate based on source of income	Disproportionate effect of 3x rent income requirements and criminal history policies on persons with disabilities, single parents, persons in recovery (considered by the Federal Fair Housing Act as having a disability).	All jurisdictions as part of funding allocations	Developers' policies should align with the best practices in the Reentry Roundtable guide.
6	Explore the feasibility to fund tenant fair housing outreach and education and programs to build renters' rights knowledge, with a focus on reaching vulnerable residents including persons with disabilities, refugees, and families with children (all of whom may be denied housing based on source of income as a pretext for other types of discrimination)	Disproportionate housing needs; displacement; discrimination.	All jurisdictions as part of funding allocations	To the extent feasible, fund fair housing activities including testing and counseling. If funding testing, beginning with dedicating resources to identifying testing organizations and developing a methodology. Conduct number of tests in the recommended testing program for this Action Step. Analyze and initiate compliance enforcement by 2020.
7	As part of the new requirement in Consolidated Planning to understand impacts around disaster recovery, explore the feasibility to examine how disinvestment and inequities in infrastructure planning have contributed to natural hazards' risks and include mitigation in five-year action plans	Disproportionate housing needs; displacement; discrimination.	All jurisdictions as part of funding allocations	To the extent possible, complete with next five-year Consolidated Plan and update annually as new data become available.
<b>PARTICIPATING HOUSING AUTHORITIES</b>				
1	Implement the revisions recommended in Section III of the Central Texas Regional AI	Disproportionate housing needs; displacement; discrimination.	All PHAs	Address recommendations within 9 months.

Source: Participating Partners in Central Texas AI and Root Policy Research.