

## Fair Housing

### Summary

Fair housing addresses discrimination in the provision of housing as well as discrimination in access to opportunities provided by the location of affordable housing. Recent actions by the United States Department of Housing and Urban Development (HUD) and the United States Supreme Court focus our attention on localized access to opportunity.

These findings are intended to aid the Oklahoma Housing Finance Agency (OHFA) determine the location of new affordable housing in relation to vulnerable populations and explore ways to expand the opportunities available to help communities of existing affordable housing achieve self-sufficiency.

### Key Findings:

- 70% of affordable housing units are located in census tracts marked by poverty
- 62% of affordable housing is located in census tracts where a majority of the residents are not white
- 13% of affordable housing units have no access to transit services and 56% have access to limited service, on-demand transit
- 2.6% of affordable housing units have limited access to a hospital
- 7.8% of affordable housing units are located in food deserts

### Recommendations:

Continued efforts to improve the quality of life for affordable housing residents and reduce discrimination associated with affordable housing will likely need to include strategies that integrate new affordable housing as well as support existing communities of affordable housing. This will likely include public policies and funding designed to integrate low-income and workforce housing into a more diverse set of communities. Additionally, those living existing affordable housing communities need increased opportunities to stay in place, become self-sufficient, and participate in determining the future of their neighborhood. OHFA may consider partnering with other state, non-profit, and for-profit agencies to explore strategies for helping communities thrive economically, socially, and environmentally.

### What is Fair Housing?

Fair housing addresses discrimination in the provision of housing as well as discrimination in access to opportunities provided by the location of affordable housing. On one hand, this protects the ability of individuals to obtain housing regardless of personal characteristics such as race, skin color, national origin, gender, familial status, or disability. It also focuses attention on more subtle forms of discrimination that cluster low-income housing in ways that inhibit the ability of communities to access services and amenities that support self-sufficiency and autonomy.

Recent actions by the United States Department of Housing and Urban Development (HUD) and the United States Supreme Court focus our attention on localized access to opportunity. In 2014, HUD released the Affirmatively Furthering Fair Housing (AFFH) rule for public comment. The draft rule

“directs HUD’s program participants to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination” (HUD 2015). In 2015, the United States Supreme Court provided legal support for actions taken to remedy patterns that impede the upward mobility and opportunity of low-income individuals and communities. In the case of Texas Department of Housing and Community Affairs v. The Inclusive Communities Project the court reiterated the need to address disparate impacts in considering the location of affordable housing and reinforced the importance of AFFH (Bostic 2015). Housing discrimination from this perspective is not only felt by individual residents, it can also be the result of actions that work to limit the opportunities to improve the quality of life in local communities.

### Approach

In Oklahoma, a combination of federal and state programs work to support the opportunities provided to individuals and families who rest safely and comfortably in an apartment or home. Here we use publicly available data for units that are part of the Low Income Housing Tax Credit (LIHTC) Program, the Rural Rental Housing Loans, or OHFA administered programs such as Oklahoma Affordable Housing Tax Credit (AHTC), the HOME investment partnership program, the Section 8 Housing Choice Voucher Program, and multi-family bonds. Collectively, these programs represent state efforts to assist individuals who are unable to afford housing.

Indicators of disparate impact vary but seem to contingent upon the contextual characteristics of a particular neighborhood. In an effort to help communities investigate and understand community level disparate impacts, HUD created a Fair Housing Assessment Tool ([http://www.huduser.gov/portal/affht\\_pt.html#affh](http://www.huduser.gov/portal/affht_pt.html#affh)). The assessment tool includes measures on indicators of disparate impacts based on the clustering of potentially vulnerable populations, including:

- Race/Ethnicity of Residents
- National Origin of Residents
- English Proficiency of Residents
- Job Accessibility
- Transit Accessibility
- Level of Poverty
- Environmental Exposure (e.g. pollution, crime, food, health care, etc.)
- Disability

This report uses the Fair Housing Assessment Tool in conjunction with readily available data to initiate a more thorough investigation of the potential for disparate impacts in the state. The findings are intended to aid the Oklahoma Housing Finance Agency regarding future location of new fair housing in relation to vulnerable populations and the future opportunities available to help communities of existing affordable housing achieve self-sufficiency.

### Data

Data for this report are compiled from a variety of sources including the United States Census, the University of Oklahoma Center for Spatial Analysis, and primary data collected as part of ongoing research efforts at the University of Oklahoma. Data are aggregated into census tracts and reported statewide as well as by county (see Appendix 1).

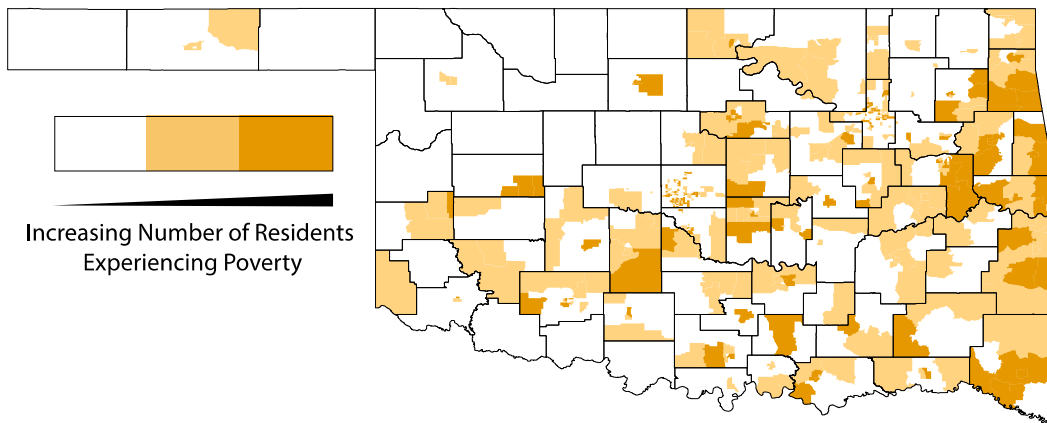
#### 1. Urban/Rural

A majority of the affordable housing in Oklahoma is situated in rural communities. Urban communities including Edmond, Lawton, Norman, Oklahoma City, and Tulsa are home to just over 1/3 of the affordable housing units in the state.

|       | Total Affordable Housing Units | Situated an Urban Setting | Situated in a Rural Setting |
|-------|--------------------------------|---------------------------|-----------------------------|
| OHFA  | 35,292                         | 11,699<br>(33.1%)         | 23,593<br>(66.9%)           |
| 515   | 5,384                          | 0                         | 5,384<br>(100%)             |
| LIHTC | 23,537                         | 8,255<br>(35.1%)          | 15,282<br>(64.9%)           |
| Total | 64,213                         | 19,954<br>(31.1%)         | 44,259<br>(68.9%)           |

2. Poverty

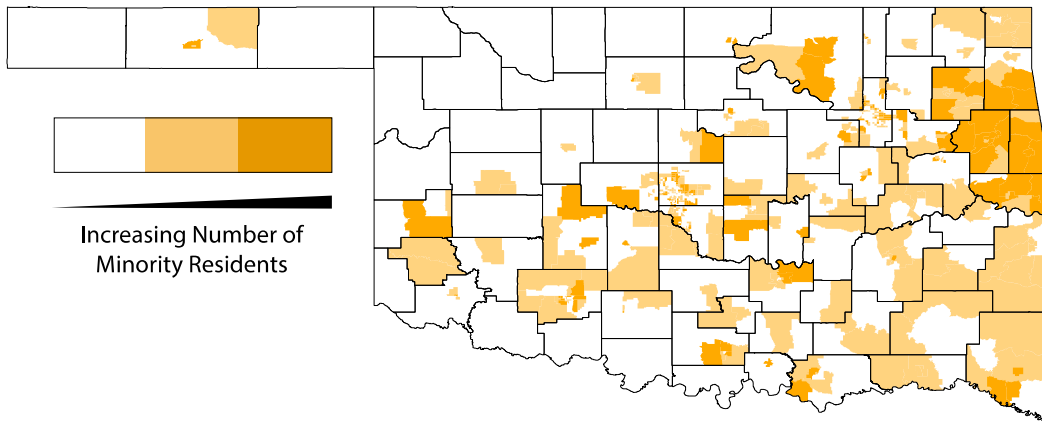
Approximately 70% of affordable housing units in Oklahoma are located in census tracts where the number of residents living in poverty is above the state average. About half of these units are located in areas of extreme poverty, where the number of individuals who are economically vulnerable exceeds 994, more than one standard deviation (411) from the mean (583).



|       | Total Affordable Housing Units | Situated in Poverty | Situated in Extreme Poverty |
|-------|--------------------------------|---------------------|-----------------------------|
| OHFA  | 35,292                         | 12,295<br>(34.8%)   | 12,464<br>(35.3%)           |
| 515   | 5,384                          | 2,093<br>(38.9%)    | 1,839<br>(34.2%)            |
| LIHTC | 23,537                         | 7,483<br>(31.8%)    | 8,924<br>(38.0%)            |
| Total | 64,213                         | 21,796<br>(33.9%)   | 23,227<br>(36.2%)           |

### 3. Non-white Enclaves

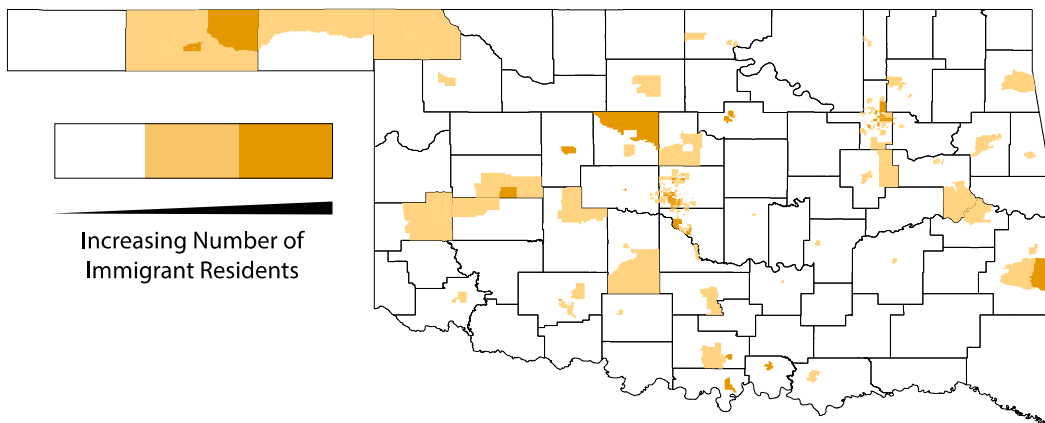
Just over 60% of affordable housing units in Oklahoma are located in census tracts where a majority of the residents are non-white. With just fewer than 24% of the total affordable housing units in census tracts heavily populated with residents who are not white – identified as census tracts where the number of non-white residents is more than 1,595 - one standard deviation (653) greater than the mean (542).



|       | Total Affordable Housing Units | Situated in Majority Non-White Community | Situated in Heavily Non-White Community |
|-------|--------------------------------|--|---|
| OHFA  | 35,292                         | 12,814<br>(36.3%)                        | 7,907<br>(22.4%)                        |
| 515   | 5,384                          | 2,229<br>(41.4%)                         | 1,288<br>(23.9%)                        |
| LIHTC | 23,537                         | 10,285<br>(43.7%)                        | 5,677<br>(24.1%)                        |
| Total | 64,213                         | 25,328<br>(39.4%)                        | 14,872<br>(23.2%)                       |

#### 4. Immigrant Enclaves

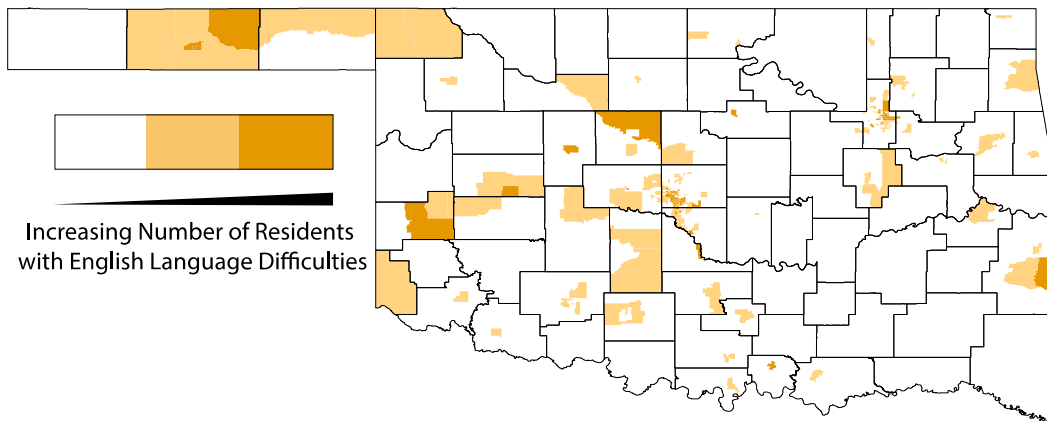
One-third of affordable housing units in Oklahoma are located in census tracts where more than the average number of residents are immigrants. About half of these units are located in areas dense with immigrants, where the number of individuals who are not citizen exceeds 349, more than one standard deviation (219) from the mean (130).



|       | Total Affordable Housing Units | Situated in Immigrant Enclave | Situated in Heavily Immigrant Enclave |
|-------|--------------------------------|-------------------------------|---------------------------------------|
| OHFA  | 35,292                         | 8,114<br>(23.0%)              | 3,358<br>(9.5%)                       |
| 515   | 5,384                          | 1,017<br>(18.9%)              | 159<br>(3.0%)                         |
| LIHTC | 23,537                         | 5,457<br>(23.2%)              | 3,364<br>(14.3%)                      |
| Total | 64,213                         | 14,588<br>(22.7%)             | 6,881<br>(10.7%)                      |

5. Limited English Proficiency

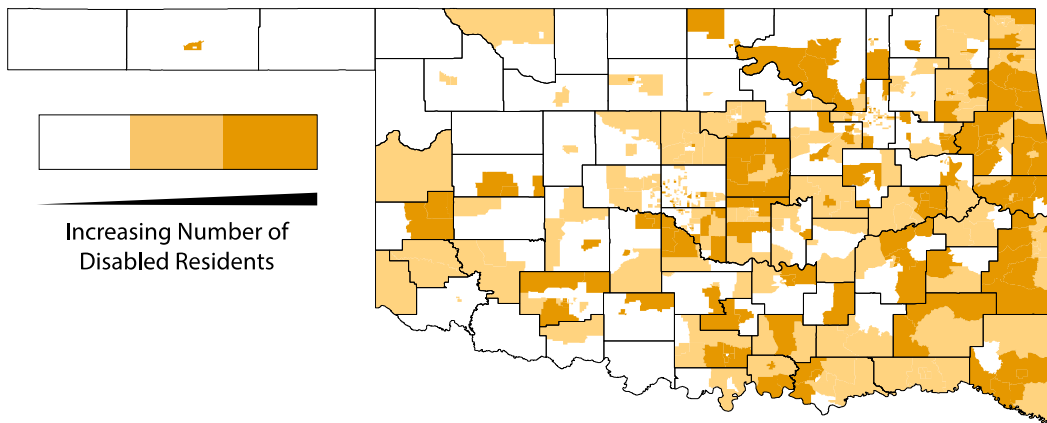
Almost 17,000 existing affordable housing units in Oklahoma are located in census tracts where more residents than average do not speak English very well. A little more than half of these units are located in areas dense with individuals with limited English proficiency, where the number of individuals who speak English less than very well exceeds 380, more than one standard deviation (240) from the mean (140).



|       | Total Affordable Housing Units | Community with more than average number of Limited English Speakers | Community dense with limited English Speakers |
|-------|--------------------------------|---|---|
| OHFA  | 35,292                         | 6,250<br>(17.7%)  | 3,122<br>(8.8%)                               |
| 515   | 5,384                          | 799<br>(14.8%)  | 240<br>(4.5%)                                 |
| LIHTC | 23,537                         | 4,034<br>(17.1%)  | 3,475<br>(14.8%)                              |
| Total | 64,213                         | 11,083<br>(17.3%)   | 6,837<br>(10.6%)                              |

6. Disability

Almost 60% of existing affordable housing units in Oklahoma are located in census tracts where more residents than average have a disability. A little more than half of these units are located in areas dense with individuals with a disability, where the number of individuals who are disabled is greater than 831, more than one standard deviation (289) from the mean (542).

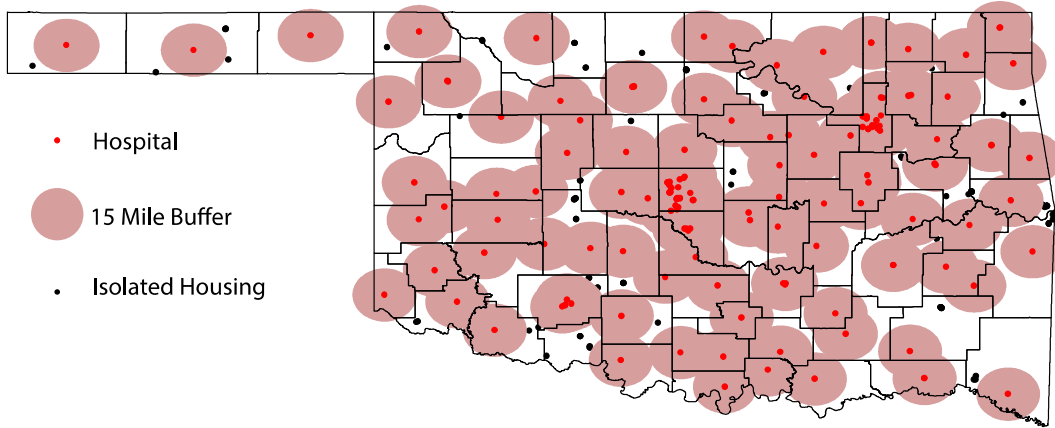


|       | Total Affordable Housing Units | Community with more than average number of Disabled Residents | Community dense with Disabled Residents |
|-------|--------------------------------|---|---|
| OHFA  | 35,292                         | 10,098<br>(28.6%)   | 10,722<br>(30.4%)                       |
| 515   | 5,384                          | 1,686<br>(31.3%)  | 2,594<br>(48.8%)                        |
| LIHTC | 23,537                         | 7,074<br>(30.1%)  | 6,289<br>(26.7%)                        |
| Total | 64,213                         | 18,858<br>(29.4%)   | 19,605<br>(30.5%)                       |



7. Hospitals

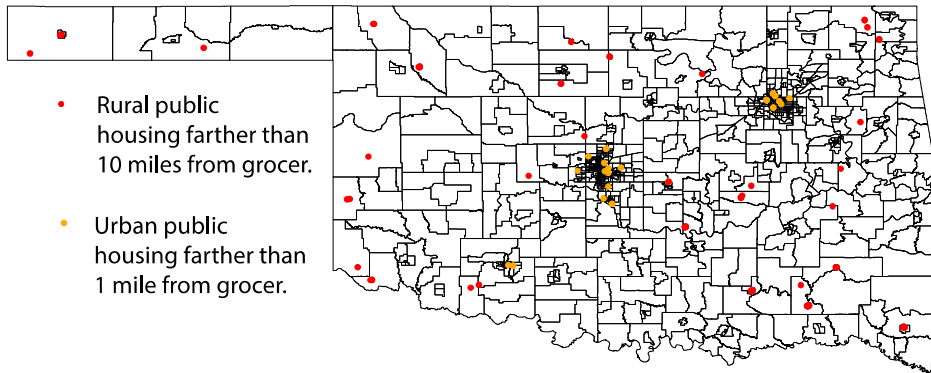
There are no affordable housing units more than 30 miles from a hospital. Approximately 2.6% of affordable housing units are farther than 15 miles from the nearest hospital. As indicated by the larger percentage of Rural Rental Housing Loan units, most of these are located in rural areas.



|       | Total Affordable Housing Units | More than 15 miles to nearest hospital | More than 30 miles to nearest hospital |
|-------|--------------------------------|--|--|
| OHFA  | 35,292                         | 628<br>(1.8%)                          | 0                                      |
| 515   | 5,384                          | 500<br>(9.3%)                          | 0                                      |
| LIHTC | 23,537                         | 532<br>(2.3%)                          | 0                                      |
| Total | 64,213                         | 1,660<br>(2.6%)                        | 0                                      |

8. Grocery Stores

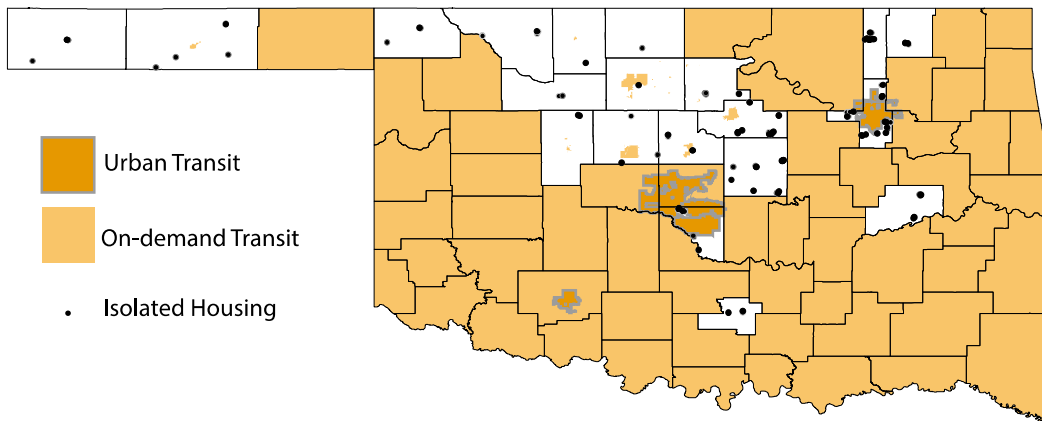
Approximately 7.8% of affordable housing units are in areas that are classified as food deserts. According to the United States Department of Agriculture, food deserts exist in urban environments further than 1 mile from a grocery store and in rural environments further than 10 miles from a grocery store (<https://apps.ams.usda.gov/fooddeserts/foodDeserts.aspx>).



|       | Total Affordable Housing Units | Urban > 1 Mile from nearest Grocer | Rural > 10 miles to nearest Grocer |
|-------|--------------------------------|------------------------------------|------------------------------------|
| OHFA  | 35,292                         | 1,493<br>(4.2%)                    | 1,097<br>(3.1%)                    |
| 515   | 5,384                          | 0                                  | 466<br>(8.7%)                      |
| LIHTC | 23,537                         | 1,175<br>(5.0%)                    | 769<br>(3.3%)                      |
| Total | 64,213                         | 2,668<br>(4.2%)                    | 2,332<br>(3.6%)                    |

9. Transit

A little over 69% of affordable housing in Oklahoma is located in a census tract with limited or no access to transit services. This includes 8,367 affordable housing units in areas that lack public transit services all together as well as 36,363 units that are situated in areas that have on-demand transportation services that often have limited operation times and may only serve elderly and disabled populations or those going to a medical appointment.



|       | Total Affordable Housing Units | No Transit       | Urban Transit     | On-Demand Transit |
|-------|--------------------------------|------------------|-------------------|-------------------|
| OHFA  | 35,292                         | 4,035<br>(11.4%) | 11,265<br>(31.9%) | 19,992<br>(56.6%) |
| 515   | 5,384                          | 767<br>(14.2%)   | 0                 | 4,617<br>(85.8%)  |
| LIHTC | 23,537                         | 3,565<br>(15.1%) | 8,217<br>(34.9%)  | 11,755<br>(49.9%) |
| Total | 64,213                         | 8,367<br>(13.0%) | 19,482<br>(30.3%) | 36,363<br>(56.6%) |

**What does this mean for Oklahoma?**

This report suggests a number of possible ways forward for the Oklahoma Housing Finance Agency as it continues to support quality low-income and workforce housing for residents of the state. Across a number of indicators of opportunity, affordable housing in the state clusters in ways that raise concerns about the opportunities available to affordable housing residents in comparison to other residents.

Continued efforts to improve the quality of life for affordable housing residents and reduce discrimination associated with affordable housing will likely need to include strategies that integrate new affordable housing as well as support existing communities of affordable housing. This will likely include public policies and funding designed to integrate low-income and workforce housing into a more diverse set of communities. Additionally, those living existing affordable housing communities need increased opportunities to stay in place, become self-sufficient, and participate in determining the future of their neighborhood. OHFA may consider partnering with other state, non-profit, and for-profit agencies to explore strategies for helping communities thrive economically, socially, and environmentally.

Moving ahead, Oklahoma should be wary of a narrowly focused vision focused solely on the problems of existing affordable housing and the integration of these residents into other communities. The relocation of residents harkens back to the physical and social destruction brought about by urban renewal. Such an approach pits efforts to enhance existing affordable housing through community development against efforts to build a more integrated and diverse society (Goetz 2015). Rather, Oklahoma has the opportunity to work closely with local municipalities to improve the conditions of current affordable housing communities while simultaneously advancing integration of low-income and workforce housing through the construction in new settings.

For future new development, a number of case studies and emerging scholarship on the importance of neighborhood effects provide guidance on possible ways forward for Oklahoma. For instance, in El Paso, Texas a public private partnership between the Housing Authority of the City of El Paso and private developers led to the development of a mixed income housing development. Eastside Crossings (<http://www.hacep.org/about-us/eastside-crossings>) provides 74 traditional affordable housing units, 79 affordable housing units, and 45 market rate units in partnership with the Texas Department of Housing and Community Affairs (Housing Authority of El Paso 2015). In Sacramento, partnership between private developers and the Capital Area Redevelopment Authority resulted in the adaptive reuse of a building listed on the National Register of Historic Buildings into affordable Housing (Vellinga 2015). Located in a dense, walkable, transit-oriented community, the Warehouse Artist Lofts (<http://www.rstreetwal.com>) are home to 116 units, 86 of which are affordable and 13,000 square feet of ground floor retail.

For existing affordable housing, strategies exist to help enhance localized opportunities and build a culture of community participation around housing. Across the nation, there is a need to refocus the discussion away from the deficits found in many communities to look for closely at opportunities (Lens 2015) and to think about the consequences of physical, social, and economic isolation (Clarke, Morenoff, Debbink, Golberstein, Elliott, & Lantz, 2014.).

The Oklahoma Housing Finance Agency may need to collaborate more closely with other governmental agencies to develop comprehensive strategies that not only improve existing housing but also work toward enhancing access to food, recreation, amenities, jobs, and quality schools. By doing so, OHFA could help build the social and physical resiliency of these communities so that residents would be empowered to choose for themselves whether or not they want to stay and be part of their existing community or move elsewhere in search of a better quality of life. A set of tools for doing some of this work is available through Policy Link (<http://www.policylink.org/equity-tools/equitable-development-toolkit/about-toolkit>). For those who are relocated due to circumstances that make staying in place impossible, intensive case management may be required to ensure that these residents avoid pitfalls and thrive in a new environment (Theodos, Popkin, Guernsey, & Getsinger, 2010). But evidence continues to suggest that stability, particularly in the lives of children, is an essential part of ensuring that everyone has the opportunity to succeed and thrive (HUD 2014).

**Bibliography**

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**Data Sources**

## 2014 American Community Survey Estimates

- Poverty: ACS\_13\_5YR\_S1701 > HC02\_EST\_VC01 > Below poverty level; Estimate; Population for whom poverty status is determined
- Non-white enclaves: ACS\_13\_5YR\_BO2001 > HD01\_VD02 > [Total Population] - Estimate; Total: - White alone
- Immigrant enclaves: ACS\_13\_5YR\_BO5001 > HD01\_VD06 > Estimate; Total: - Not a U.S. citizen
- Limited English Proficiency: ACS\_13\_5YR\_S1601 > HC03\_EST\_VC01 > Percent of specified language speakers - Speak English less than "very well"; Estimate; Population 5 years and over
- Disability: ACS\_13\_5YR\_S1810 > HC02\_EST\_VC01 > with a disability; estimate; total civilian noninstitutionalized population

## University of Oklahoma Center for Spatial Analysis: Data Warehouse

- Hospital locations as of 2008 derived from Oklahoma State Department of Health, Health Care Information Division.

## University of Oklahoma Division of Regional and City Planning

- Grocery store locations retrieved from Internet search conducted by faculty and student research assistants at the University of Oklahoma.
- Transit locations retrieved from Oklahoma Department of Transportation (<http://www.okladot.state.ok.us/transit/pubtrans.htm>) and geocoded by faculty and student research assistants at the University of Oklahoma.

**Appendix 1: County affordable housing Summaries**

| County    | Total Units | Units at Risk for Poverty | Units in mostly Non-white Enclaves | Units in Community of Immigrants | Units in Limited English Neighborhood | Units nearer Elevated Number of Disabled | Units farther than 15 miles to Hospital | Units located in a Food Desert | Units that lack readily available Transit |
|-----------|-------------|---------------------------|------------------------------------|----------------------------------|---------------------------------------|--|---|--------------------------------|---|
| Adair     | 676         | 676                       | 676                                | 0                                | 0                                     | 177                                      | 0                                       | 0                              | 0   |
| Alfalfa   | 93          | 0                         | 0                                  | 0                                | 0                                     | 0  | 93                                      | 0                              | 23  |
| Atoka     | 145         | 121                       | 0                                  | 0                                | 0                                     | 0  | 24                                      | 145                            | 24  |
| Beaver    | 0           | 0                         | 0                                  | 0                                | 0                                     | 0  | 0                                       | 0                              | 0   |
| Beckham   | 343         | 87                        | 228                                | 0                                | 228                                   | 315                                      | 0                                       | 28                             | 0   |
| Blaine    | 169         | 0                         | 0                                  | 127                              | 127                                   | 0  | 24                                      | 0                              | 42  |
| Bryan     | 1,005       | 538                       | 501                                | 0                                | 0                                     | 501                                      | 0                                       | 0                              | 0   |
| Caddo     | 658         | 292                       | 387                                | 0                                | 0                                     | 292                                      | 95                                      | 0                              | 0   |
| Canadian  | 1,655       | 0                         | 248                                | 0                                | 0                                     | 0  | 48                                      | 24                             | 0   |
| Carter    | 1,040       | 373                       | 938                                | 189                              | 0                                     | 972                                      | 24                                      | 24                             | 24  |
| Cherokee  | 1,359       | 986                       | 412                                | 0                                | 0                                     | 436                                      | 0                                       | 13                             | 0   |
| Choctaw   | 433         | 312                       | 0                                  | 0                                | 0                                     | 0  | 0                                       | 0                              | 0   |
| Cimarron  | 69          | 0                         | 0                                  | 0                                | 0                                     | 0  | 8                                       | 69                             | 69  |
| Cleveland | 2,389       | 1,080                     | 194                                | 758                              | 648                                   | 601                                      | 0                                       | 214                            | 718                                       |
| Coal      | 71          | 0                         | 0                                  | 0                                | 0                                     | 71                                       | 0                                       | 0                              | 0   |
| Comanche  | 1,214       | 200                       | 182                                | 0                                | 0                                     | 225                                      | 123                                     | 151                            | 24  |
| Cotton    | 114         | 0                         | 0                                  | 0                                | 0                                     | 0  | 114                                     | 0                              | 0   |
| Craig     | 290         | 0                         | 0                                  | 0                                | 0                                     | 157                                      | 0                                       | 72                             | 0   |
| Creek     | 1,359       | 163                       | 163                                | 0                                | 0                                     | 670                                      | 0                                       | 0                              | 0   |
| Custer    | 255         | 78                        | 0                                  | 0                                | 0                                     | 172                                      | 0                                       | 0                              | 0   |
| Delaware  | 712         | 695                       | 285                                | 0                                | 0                                     | 712                                      | 28                                      | 0                              | 0   |
| Dewey     | 75          | 0                         | 0                                  | 0                                | 0                                     | 0  | 16                                      | 0                              | 0   |
| Ellis     | 39          | 0                         | 0                                  | 0                                | 0                                     | 0  | 0                                       | 0                              | 0   |
| Garfield  | 824         | 683                       | 127                                | 0                                | 0                                     | 0  | 0                                       | 52                             | 50  |



| County     | Total Units | Units at Risk for Poverty | Units in mostly Non-white Enclaves | Units in Immigrant Enclaves | Units in Limited English Neighborhood | Units nearer Elevated Number of Disabled | Units farther than 15 miles to Hospital | Units located in a Food Desert | Units that lack readily available Transit |
|------------|-------------|---------------------------|------------------------------------|-----------------------------|---------------------------------------|--|---|--------------------------------|---|
| Garvin     | 557         | 0                         | 0                                  | 0                           | 0                                     | 265                                      | 0                                       | 0                              | 0   |
| Grady      | 758         | 71                        | 0                                  | 0                           | 0                                     | 621                                      | 71                                      | 0                              | 0   |
| Grant      | 8           | 0                         | 0                                  | 0                           | 0                                     | 0  | 8                                       | 8                              | 8   |
| Greer      | 100         | 0                         | 0                                  | 0                           | 0                                     | 0  | 0                                       | 0                              | 0   |
| Harmon     | 62          | 0                         | 0                                  | 0                           | 0                                     | 0  | 0                                       | 2                              | 0   |
| Harper     | 50          | 0                         | 0                                  | 0                           | 0                                     | 0  | 14                                      | 36                             | 50  |
| Haskell    | 63          | 0                         | 0                                  | 0                           | 0                                     | 0  | 0                                       | 0                              | 0   |
| Hughes     | 341         | 0                         | 0                                  | 0                           | 0                                     | 0  | 0                                       | 76                             | 0   |
| Jackson    | 322         | 18                        | 18                                 | 0                           | 18                                    | 0  | 30                                      | 30                             | 0   |
| Jefferson  | 36          | 0                         | 0                                  | 0                           | 0                                     | 0  | 0                                       | 0                              | 0   |
| Johnston   | 517         | 493                       | 0                                  | 0                           | 0                                     | 493                                      | 0                                       | 0                              | 0   |
| Kay        | 1,001       | 196                       | 168                                | 0                           | 0                                     | 344                                      | 0                                       | 0                              | 0   |
| Kingfisher | 153         | 0                         | 0                                  | 8                           | 8                                     | 0  | 8                                       | 8                              | 40  |
| Kiowa      | 143         | 0                         | 0                                  | 0                           | 0                                     | 0  | 0                                       | 0                              | 0   |
| Latimer    | 220         | 0                         | 0                                  | 0                           | 0                                     | 220                                      | 0                                       | 0                              | 0   |
| Le Flore   | 1,050       | 204                       | 0                                  | 0                           | 0                                     | 573                                      | 166                                     | 0                              | 0   |
| Lincoln    | 705         | 143                       | 0                                  | 0                           | 0                                     | 705                                      | 42                                      | 0                              | 705                                       |
| Logan      | 629         | 0                         | 0                                  | 0                           | 0                                     | 300                                      | 0                                       | 0                              | 158                                       |
| Love       | 62          | 0                         | 0                                  | 62                          | 0                                     | 0  | 0                                       | 0                              | 0   |
| Major      | 76          | 0                         | 0                                  | 0                           | 0                                     | 0  | 0                                       | 0                              | 76  |
| Marshall   | 134         | 0                         | 109                                | 109                         | 109                                   | 109                                      | 0                                       | 0                              | 0   |
| Mayes      | 546         | 382                       | 218                                | 0                           | 0                                     | 382                                      | 0                                       | 0                              | 0   |
| McClain    | 346         | 55                        | 0                                  | 0                           | 47                                    | 299                                      | 0                                       | 0                              | 0   |
| McCurtain  | 767         | 767                       | 746                                | 0                           | 0                                     | 767                                      | 57                                      | 315                            | 0   |
| McIntosh   | 488         | 0                         | 0                                  | 0                           | 0                                     | 169                                      | 0                                       | 0                              | 488                                       |

| County      | Total Units | Units at Risk for Poverty | Units in mostly Non-white Enclaves | Units in Community of Immigrants | Units in Limited English Neighborhood | Units nearer Elevated Number of Disabled | Units farther than 15 miles to Hospital | Units located in a Food Desert | Units that lack readily available Transit |
|-------------|-------------|---------------------------|------------------------------------|----------------------------------|---------------------------------------|--|---|--------------------------------|---|
| Murray      | 224         | 95                        | 0                                  | 0                                | 0                                     | 224                                      | 0                                       | 0                              | 224                                       |
| Muskogee    | 1,572       | 642                       | 59                                 | 0                                | 0                                     | 44                                       | 48                                      | 0                              | 0   |
| Noble       | 387         | 0                         | 0                                  | 0                                | 0                                     | 0  | 42                                      | 30                             | 345                                       |
| Nowata      | 229         | 0                         | 0                                  | 0                                | 0                                     | 185                                      | 0                                       | 0                              | 229                                       |
| Okfuskee    | 214         | 169                       | 0                                  | 0                                | 0                                     | 213                                      | 0                                       | 1                              | 0   |
| Oklahoma    | 11,497      | 3,920                     | 3,518                              | 2,445                            | 2,641                                 | 456                                      | 0                                       | 1,202                          | 25  |
| Okmulgee    | 663         | 303                       | 227                                | 0                                | 0                                     | 127                                      | 0                                       | 0                              | 0   |
| Osage       | 1,544       | 538                       | 700                                | 0                                | 0                                     | 1,391                                    | 42                                      | 0                              | 0   |
| Ottawa      | 409         | 0                         | 0                                  | 0                                | 0                                     | 96                                       | 0                                       | 84                             | 0   |
| Pawnee      | 65          | 0                         | 0                                  | 0                                | 0                                     | 0  | 37                                      | 20                             | 0   |
| Payne       | 1,797       | 1,209                     | 0                                  | 120                              | 120                                   | 648                                      | 0                                       | 0                              | 971                                       |
| Pittsburg   | 1,268       | 0                         | 50                                 | 0                                | 0                                     | 284                                      | 16                                      | 16                             | 0   |
| Pontotoc    | 810         | 311                       | 286                                | 0                                | 0                                     | 336                                      | 0                                       | 0                              | 0   |
| Pottawatomi | 1,715       | 1,009                     | 587                                | 0                                | 0                                     | 954                                      | 0                                       | 284                            | 0   |
| Pushmataha  | 381         | 234                       | 0                                  | 0                                | 0                                     | 381                                      | 147                                     | 381                            | 0   |
| Roger Mills | 14          | 0                         | 0                                  | 0                                | 0                                     | 0  | 0                                       | 14                             | 0   |
| Rogers      | 973         | 0                         | 0                                  | 0                                | 0                                     | 0  | 36                                      | 0                              | 0   |
| Seminole    | 426         | 76                        | 75                                 | 0                                | 0                                     | 75                                       | 0                                       | 123                            | 0   |
| Sequoyah    | 1,449       | 922                       | 922                                | 0                                | 0                                     | 726                                      | 243                                     | 0                              | 0   |
| Stephens    | 841         | 0                         | 0                                  | 0                                | 0                                     | 310                                      | 12                                      | 0                              | 0   |
| Texas       | 816         | 0                         | 372                                | 782                              | 782                                   | 372                                      | 60                                      | 6                              | 75  |
| Tillman     | 114         | 0                         | 0                                  | 0                                | 0                                     | 0  | 0                                       | 0                              | 0   |
| Tulsa       | 9,868       | 4,750                     | 1,807                              | 2,281                            | 2,109                                 | 1,419                                    | 0                                       | 1,441                          | 2,220                                     |
| Wagoner     | 1,094       | 691                       | 461                                | 0                                | 0                                     | 701                                      | 0                                       | 0                              | 0   |
| Washington  | 1,262       | 0                         | 108                                | 0                                | 0                                     | 108                                      | 0                                       | 0                              | 1,262                                     |
| Washita     | 189         | 0                         | 0                                  | 0                                | 0                                     | 0  | 0                                       | 0                              | 0   |

| County   | Total Units | Units at Risk for Poverty | Units in mostly Non-white Enclaves | Units in Community of Immigrants | Units in Limited English Neighborhood | Units nearer Elevated Number of Disabled | Units farther than 15 miles to Hospital | Units located in a Food Desert | Units that lack readily available Transit |
|----------|-------------|---------------------------|------------------------------------|----------------------------------|---------------------------------------|--|---|--------------------------------|---|
| Woods    | 65          | 0                         | 0                                  | 0                                | 0                                     | 0  | 2                                       | 0                              | 65  |
| Woodward | 161         | 0                         | 0                                  | 0                                | 0                                     | 0  | 0                                       | 60                             | 0   |